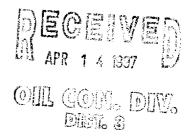
Denny & Fourt DEPUTY OIL & GAS INSPECTOR

DEC 22 1997

Meter Number:90331
Location Name:TAFOYA #1A
Location:TN-32 RG-13
SC-35 UL-F
4 - Fee

NMOCD Zone: OUTSIDE Hazard Ranking Score: 00



RATIONALE FOR RISK-BASED CLOSURE OF PRODUCTION PITS LOCATED OUTSIDE OF THE VULNERABLE ZONE IN THE SAN JUAN BASIN

This production pit location was ranked according to the criteria in the New Mexico Oil Conservation Division's Unlined Surface Impoundment Closure Guidelines and received a ranking score of zero. The estimated depth to groundwater is greater than 100-feet beneath ground surface (bgs), the pit is not in a well head protection area, and there are no surface water bodies within 1,000 horizontal feet of the pit location.

The primary source, discharge to the pit has been removed. There has been no discharge to the pits for at least 4 years and the pits have been closed for at least one year.

Each pit was backfilled with clean soil and graded in a manner to divert precipitation away from the excavated area. Minimal infiltration of rainfall is expected. Any rainfall that does infiltrate the ground surface must migrate through clean backfill before reaching the residual hydrocarbons.

There is no source material at the ground surface, so direct contact of hydrocarbons with livestock and the populous is not likely.

In general, outside of the vulnerable area and alluvial valleys, bedrock material is generally encountered within 20 feet of the ground surface. Bedrock material in the San Juan Basin consists of interbedded sandstones, shales and clays. According to Freeze and Cherry, 1979, the hydraulic conductivity of the bedrock material are as follows:

Sandstone 10^{-9} to 10^{-13} cm/sec Shale 10^{-12} to 10^{-16} cm/sec Clay 10^{-12} to 10^{-15} cm/sec

Based on this information, the residual hydrocarbons should not migrate to groundwater.

Natural process (bioremediation) are degrading the residual hydrocarbon to carbon dioxide and water and will continue until the source is gone, therefore minimizing any impact to the environment.

Based on the above information, it is highly unlikely that any source material will impact groundwater or ever find an exposure pathway to affect human health and therefore El Paso Field Services Company (EPFS) requests closure of this pit location.

Remediation Method:

Excavation

Onsite Bioremeaiation

Backfill Pit Without Excavation

Soil Disposition:

Envirotech

Other Facility

Pit Closure Date: 4-22-94

Remarks: Assessingly Soid Pit Way in the Zone, Duble Checked & Facility

it wasnit, Pulled a grab sample

Signature of Specialist: Vale Wilson

SLOSURE

REMARKS

FIELD PIT SITE ASSESSMENT FORM

1	Meter: 90331 Location: TAFOYA #1A							
	Operator #: 0148 Operator Name: SNYOER OIL P/L District: KUTZ							
GENERAL	Coordinates: Letter: F Section 35 Township: 32 Range: 13							
GE	Or Latitude Longitude							
	Pit Type: Dehydrator 又 Location Drip: Line Drip: Other:							
	Site Visit Date: 3.31.94 Run: 02 21							
	NMOCD Zone: Inside Land Type: BLM (From NMOCD Vulnerable 6.8.94 State Maps) Zone RT Outside Indian							
INT	Depth to Groundwater Less Than 50 Feet (20 points) □ 50 Ft to 99 Ft (10 points) □ Greater Than 100 Ft (0 points) ☒							
ASSESSMENT	Wellhead Protection Area: Is it less than 1000 ft from wells, springs, or other sources of fresh water extraction?, or; Is it less than 200 ft from a private domestic water source? YES (20 points) NO (0 points)							
SITE	Horizontal Distance to Surface Water Body Less Than 200 Ft (20 points) 200 Ft to 1000 Ft (10 points) Greater Than 1000 Ft (0 points) Name of Surface Water Body							
	(Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)							
	TOTAL HAZARD RANKING SCORE: POINTS							
REMARKS	Remarks: ONLY PIT ON LOCATION.							
EM.								
R								

	ORIGINAL PIT LOCATION Original Pit : a) Degrees from NorthFootage to Wellhead _ <i>45'</i> b) Degrees from NorthFootage to Dogleg
ORIGINAL PIT LOCATION	Dogleg Name c) Length : <u>/8´</u> Width : <u>/6´</u> Depth : <u>*/</u> ´
	WEILHEAD 18'
	Remarks:
	END DUMP
KEMAKKS	
\ \times_{\frac{1}{2}}	
	Completed By: 3.31-94 Signature Date

FIF) PIT REMEDIATION/CLOS RE FORM

GENERAL	Meter: 10331 Location: Rafoya IA Coordinates: Letter: F Section 35 Township: 32 Range: 13 Or Latitude Longitude Date Started: 422-94 Area: 02 Run: 21
FIELD OBSERVATIONS	Sample Number(s): VW23 Sample Depth: Feet Final PID Reading PID Reading Depth Feet Yes No Groundwater Encountered (1) \(\overline{\text{Y}} \) (2) Approximate Depth Feet
CLOSURE	Remediation Method: Excavation Onsite Bioremediation Backfill Pit Without Excavation Soil Disposition: Envirotech Other Facility Pit Closure Date: 4-22-94 Pit Closed By: BCF Pit Closed By: BCF
REMARKS	Remarks: Assessment said pit was in the zone. Double checked & favorant it was it. Pulled a grab sample Signature of Specialist: Vale Wilson

(SP3191) 04/07/94



FIELD SERVICES LABORATORY ANALYTICAL REPORT PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	SAMPLE	DENTIFICA	TION				
	Field II	D	4/29/94	Lab ID			
SAMPLE NUMBER:	VWa	24740E	W17405002 945002				
MTR CODE SITE NAME:	9033		NIA				
SAMPLE DATE TIME (Hrs):	41.22/94		0900	0900			
SAMPLED BY:	111-11.	NIA	11/2 2/4:				
DATE OF TPH EXT. ANAL.:	4/28/9) 4	4/2/144				
DATE OF BTEX EXT. ANAL.:	NIN	4	A David	NIA			
TYPE DESCRIPTION:	14		DOM	CLAL			
REMARKS:	actide	WV:	7 So r	10 (3T Ex	regid.	·
	R	ESULTS					
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PARAMETER	RESULT	UNITS		QUALIFIERS			
			DF	Ø	M(g)	V(ml)	1
BENZENE		MG/KG					
TOLUENE		MG/KG					-
ETHYL BENZENE		MG/KG	:				
TOTAL XYLENES		MG/KG					J I
TOTAL BTEX	AND 5/10/94	MG/KG	7,7273		,55	20	12
TPH (418.1)	2970	MG/KG			2.04	28	
HEADSPACE PID	318	PPM					
PERCENT SOLIDS	86.2	%					
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F = Dilution Factor Used	P			<i>=</i> //.			

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Run : 01

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Collection: 01:56:37 May 01 1994 Meth(B): BETX [06:35:09 Apr 29 1994]

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