

STAGE 2 WORKPLANS

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CERTIFIED MAIL RETURN RECEIPT NO. 7008 3230 0001 9310 9314

June 17, 2011

Mr. Edward Hansen New Mexico Energy, Minerals, & Natural Resources Dept. Oil Conservation Division, Environmental Bureau 1220 S. St. Francis Drive Santa Fe, New Mexico 87505

Re: Project Status Report, Rice Operating Company, E-15 Release, BD SWD System, Unit D&E, Section 15, T-22-S, R-37-E, Lea County, New Mexico, NMOCD CASE #AP-027

Mr. Hansen:

Tetra Tech Inc. (Tetra Tech) submits the following Project Status Report for the Rice Operating Company (ROC), E-15 Release, located in the BD Salt Water Disposal System. ROC is the service provider (agent) for the BD Salt Water Disposal System and has no ownership of any portion of the pipeline, well or facility. The BD SWD system is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis.

Background

On March 29, 2000, a leak was discovered on the pipeline adjacent to the E-15 junction box. According to the form C-141 (Initial) filed with the NMOCD, the spill was due to a rupture in a steel dresser sleeve. An unknown volume of produced water was discharged with 300 barrels of fluid recovered. Regional groundwater information indicates that the depth to groundwater is approximately 75 feet below ground surface (bgs).



During March 2000, approximately 2,000 cubic yards of soil were excavated and transported offsite for disposal. The site was backfilled with clean soil and brought up to grade. Initial soil sampling indicated the site was impacted with chlorides. In order to delineate the site, between January 22, 2001 and February 11, 2005, six monitor wells, two recovery wells and six borings were installed at the site. Initial testing indicated the groundwater was impacted with chlorides.

On January 26, 2001, a Notice of Groundwater Impact was submitted to Mr. Wayne Price of the NMOCD in Santa Fe, New Mexico. A Stage 1/Stage 2 Abatement Plan was requested by the NMOCD and was submitted to the state on June 5, 2001. The abatement plan requested addition soil borings and monitor wells at the site to complete vertical and horizontal delineation.

To complete delineation and remediation of the vadose zone, in January 2002, the release area was excavated to dimensions of 140 feet x 160 feet x 35 feet below ground surface (bgs). Sidewall samples were collected and confirmed that TPH and BTEX RRAL's had been achieved and chloride concentrations were at or below 250 mg/Kg. A clay barrier compacted to a minimum of 12 inches was constructed at the bottom of the excavation and tested for density. A 20 mil high density polyethylene (HDPE) liner was placed on top of the clay barrier and brought up the sides of the excavation to the surface. The excavated soils were placed back into the excavation up to a depth of 5 feet bgs. A top liner of 20 mil HDPE was placed into the excavation at that point and the remainder of the excavation was backfilled with clean topsoil and contoured to match the surrounding surface.

In September 2006, the NMOCD requested further expansion of the abatement plan to address chloride impacts under Mr. Boyd's property. The amended Stage 1/Stage 2 plan was resubmitted in November 2006.

In 2005, a groundwater remediation system was installed at the site to address the chloride impacts to the groundwater. Due to low volumes, silting, and equipment problems, the system was discontinued in 2007. Several of the silted or dry monitor wells were permanently abandoned (MW-5, MW-6 and RW-2). Since 2005, the four active monitor wells (MW-1 through MW-4) have been sampled on a quarterly basis. On January 6, 2011, ROC submitted a work plan detailing the installation of three additional monitor wells at the site in order to further delineate groundwater quality and to determine if groundwater exists throughout the entire site. The work plan was approved via email by the NMOCD on February 17, 2011.

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Monitor Well Installation

As approved, three monitor wells MW-6R, MW-7 and MW-8 were installed on March 21-22, 2011. The monitor well locations are shown on the attached Figure. The total depths of the monitor wells ranged from 86 feet to 95 feet below ground surface (bgs). Copies of the drilling and completion logs are included in Appendix A.

Path Forward

The up-gradient monitoring well (MW-1) has consistently exhibited chloride impact. As such, ROC believes that this site is a candidate for chloride mass removal. ROC proposes replacing the well with the highest chloride concentration (MW-2) with a 4 inch well and evaluate the existing site data to calculate a chloride mass for removal. If approved, the 4 inch well will be installed and ROC will submit an estimation of chloride mass. ROC will attempt to remove the chloride mass from this well. If the well fails to yield the appropriate volume of water, ROC will request to remove the mass from another recovery system located within the BD system.

If you have any questions, please contact me at (432) 682-4559, or Hack Conder of ROC at (575) 393-9174.



Respectfully Submitted, Tetra Tech, Inc.

Tim Reed, P.G.

Senior Consultant

cc: Hack Conder – ROC Enclosures: Figure, Photos, Drilling and Completion Logs



Monitor Well Locations



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PHOTOGRAPHS

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BD E-15 leak Unit E, Section 15, T-22-S, R-37-E

Drilling well 6R, facing north

Inserting the casing, facing north

Inserting the silica sand pack

Adding the bentonite seal

Adding the concrete to seal the monument

Completed MW-6R

Drilling well #7, facing south-east

Adding the silica sand pack

Inserting the casing, facing south-east

Temporary well completed 3-22-11

Set the permanent well monument with concrete 3-25-11

Completed MW-7

Drilling MW-8, facing north

Adding the silica sand pack

Inserting the casing

Temporary well completed 3-21-11

Concreting the permanent well in 3-25-11

Completed MW-8

APPENDIX A DRILLING AND COMPLETION LOGS

.

Logger: Driller: Drilling Method: Start Date: End Date:		Jordan Woodfin Harrison & Cooper, Inc. Air rotary 3/22/2011 3/22/2011		RECS SHEDLYING & SAFETYI LLC					
				y 1 1	MW 3 MW 3 MW 4 MW 7 MW 5		Project Name: Well ID: BD E-15 leak MW-6F Project Consultant: Tetra Tech		
Comme	ents: No s e TD	east of	es take f the cer DRAF ft	n for this y nter of the TED BY: L.	well. Located 816 feet south- ne former excavation. L. Weinheimer GW = 79 ft		t: 32°23'39.391 ng: 103°9'15.3	ec. 15 T22 "N 836"W	2S R37E County: LEA State: NM
Depth (feet)	chlori field te	ide ests	LAB	PID	Description		Lithology	Well	Construction
5 ft									
10 ft					NO SAMPLES TAKEN			VC	
15 ft								2 in P	
20 ft									
25 ft		- /							
30 ft									bentonite
35 ft									seal
40 ft									

Depth (feet)	chloride field tests	LAB	PID	Description	Lithology	Well Construction
				1		
45 ft						
50 ft						
55 ft						
60 ft						
65 ft						
70 ft						
75 ft						
80 ft						
85 ft						sand pack
90 ft						
95 ft						

Logger:Jordan WoodfinDriller:Harrison & Cooper, Inc.Drilling Method:Air rotaryStart Date:3/21/2011End Date:3/21/2011Comments: No samples taken for thi of the center of the DRAFTED BY: I		Jordan Woodfin Harrison & Cooper, Inc.		REGS					
		s well. Located 926 ft south former excavation.		Project Name: Well ID: BD E-15 leak MW-7 Project Consultant: Tetra Tech Location: UL/E sec. 15 T22S R37E Lat: 32°23'35.112"N County: LE/					
Depth (feet)	chlor field to	ride ests	LAB	PID	Description		Lithology	Well	Construction
5 ft					NO SAMPLES TAKEN				
10 ft 15 ft								U	
20 ft								2 in PV	
25 ft									
30 ft									bentonite seal
35 ft									
40 ft		_							

Depth (feet)	chloride field tests	LAB	PID	Description	Lithology	Well Construction
45 ft						
50 ft	1.198					
55 ft						
1.01	- 2-2-2-3	19. 2				
		-				
60 ft	100	-				
65 ft		1.1				
70 ft						
	10 C					
						sand
75 ft	2.2					pack
80 ft						
85 ft						
86 ft						

Logger: Driller:		Jordan Woodfin Harrison & Cooper, Inc.		Jordan Woodfin Harrison & Cooper, Inc.		MUV 1 MUV 8 ROV 20 MW 3	RECS			
Drilling Method: Start Date: End Date:		Air rotary 3/22/2011 3/22/2011		Air rotary 3/22/2011 3/22/2011 MW 5 MW 5		Project Name: Well ID: BD E-15 leak MW-8 Project Consultant: Tetra Tech				
Comme	ents: No s t TD	sampi he ce = 90 f	les take nter of DRAFT	en of this the forn FED BY: L	is well. Located 190 ft east of mer excavation site. L. Weinheimer GW = 79 ft		cation: UL/D s t: 32°23'43.861 ng: 103°9'21.3	sec. 15 T2 I"N 286"W	22S R37E County: LEA State: NM	
Depth (feet)	chlori field te	ide ests	LAB	PID	Description		Lithology	Well	Construction	
5 ft	- 1 ĝ.	_								
10 ft										
								1 PVC		
15 ft								2 ii		
20 ft										
25 ft										
30 ft									bentonite	
35 ft										
40 ft										

ieet) field	tests	AB	PID	Description	Lithology	Well Cor	struction
45 ft							
50 ft							
55 ft							
60 ft							
65 ft							
70 ft							
75 ft							
80 ft							sand pack
95.4							

	Client:	Rice Operating				
Project Name:				1.4	Well Description:	Schematic Drawing of Well Construction for Monitoring
	Location:		3D E-15 Leak			Well
Depth (feet)		Comments:			Material Descriptions:	
0.0	E	Borehole Diameter - 5			Cement, 0'-2', 6 bags	
	Surface Co	mpletion - 4"x4" Steel 2'x'2 Concrete Pad	Upright w/	2" SCH 40 PVC Casing	Bentonite, 2'-72', 10 bags Riser, +3'-75'	
72.0 75.0 95.0 95.0					8/16 Sand, 72'-95', 7 bags, Screen 0.010, 75'- 95'	
Harriso P.O. Bo Wolffor	n & Coope x 96 th, Texas 7	r, Inc. 9382		MW	-6R ng Well	- 22-Mar-11

Client	lient: Rice Operating			
Project Name	:		Well Description:	Schematic Drawing of Well Construction for Monitoring
Location	:	BD E-15 Leak		Well
Depth (feet)	Comments:		Material Description	IS:
0.0 2.0	Borehole Diameter -	5"	Cement, 0'-2', 7 bag	s
Surface 0	Completion - 4"x4" Ste 2'x'2 Concrete Pad	el Upright w/	Bentonite, 2'-63', 11 ba Riser, +3'-66'	ags
63.0 66.0 86.0 86.0			8/16 Sand, 63'-86', 8 bags, Screen 0.010, 6 86'	3-6'-
Harrison & Coop	er, Inc.		MW-7	01 May 11
Wolfforth, Texas	79382	M	onitoring Well	21-Wal-11

	Client:	Rice Operating					
Proj	Project Name:				Well Description:	Schematic Drawing of Well Construction for Monitoring	
	Location:		BD E-15 Leak			Well	
Depth (feet)		Comments:			Material Descriptions:		
0.0 2.0	E	Borehole Diameter -	5"		Cement, 0'-2', 7 bags		
	Surface Co	mpletion - 4"x4" Ste 2'x'2 Concrete Pad	el Upright w/	2" SCH 40 PVC Casing	Bentonite, 2'-67', 12 bags Riser, +3'-70'		
90.0					8/16 Sand, 67'-90', 8 bags, Screen 0.010, 70'- 90'		
Harrison P.O. Bo	n & Cooper x 96	, Inc.		MW	-8	22-Mar-11	

Site Specific Potentiometric Map

Case #: AP-027

Feet

Drawing date: 7-15-11 Drafted by: L. Weinheimer

Regional Area Potentiometric Map

BD E-15 leak

Legals: UL/E sec. 15 T22S R37E Case #: AP-027

			W S E
0	950	1,900	3,800
			Feet
Drawin Drafter	ng date: 7 d by: L. W	-15-11 /einheimer	