

1R - 427-163

**REPORTS**

**DATE:**

6-10-10

# R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266-0745

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2010 JUN 11 A 11: 22

June 10, 2010

Edward J. Hansen  
NMOCD Environmental Bureau  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
Via E-mail and FedEx

RE: ROC EME JR Phillips Site NMOCD: 1R427-163  
Corrective Action Plan Report and Termination Request:  
Chloride Mass Removal from Ground Water  
Unit D, Section 6, Township 20S, Range 37E

Mr. Hansen:

This letter provides documentation of chloride mass removal from ground water in the EME system at the EME L-6 as proposed by our February 26, 2010 Corrective Action Plan Addendum. Our February 2010 submission was approved by NMOCD on April 28, 2010 and detailed the calculation of chloride in the vadose zone based on characterization of the site using soil borings as 829 kg.

In May, Rice Operating Company pumped a total of 20,790 gallons from EME L-6 RW-1 and RW-2. Results for ground water samples from EME L-6 RW-1 and RW-2 collected on May 3, 2010 as well as records of pumping by day are attached. Chloride levels in EME L-6 RW-1 and RW-2 varied slightly (11,200 mg/L and 11,400 mg/L respectively) and both wells were pumped at equal rates. The chloride mass removal calculation in Table 1 employs of the lower these two concentrations. Table 1 presents the chloride removal accomplished at EME L-6 in May.

Table 1. Chloride Removal from Ground Water Near EME JR Phillips, May 2010

Chloride Mass at JR Philips (kg)	Chloride Concentration in water at EME L-6 RW-1 (mg/L)	Water Removed from L-6 RW-1 & RW-2 (gallons)	Chloride removed at L-6 (kg)
829	11,200	20,790	881

Pumping in May removed approximately 881 kg of chloride in ground water near the site, an estimated 52 kg of chloride more than proposed. Rice Operating Company has ceased ground water pumping for chloride removal on behalf of EME JR Phillips at this time. All water removed in this effort was used for line maintenance.

ROC acknowledges they have met the requirements of 19.15.29 NMAC and we respectfully request termination of this regulatory file.

June 10, 2010  
Page 2

If you have any questions, please contact us or Hack Conder at Rice Operating Company.

Sincerely,  
R.T. Hicks Consultants, Ltd.

A handwritten signature in cursive script that reads "Katie Lee". The signature is written in black ink and is positioned above the printed name and title.

Katie Lee  
Project Scientist

Copy: Hack Conder, Rice Operating Company

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**EME JR Phillips (1R427-163)**

Date	bbls removed
5/3/2010	
5/10/2010	190
5/12/2010	110
5/17/2010	130
5/19/2010	65
Total for project	495

**Cl in ground water, EME L-6 RW-1**

11,200 mg/L

**Cl in ground water, EME L-6 RW-2**

11,400 mg/L

**GW removed, gallons      20,790**

**Total kg cl removed      881**



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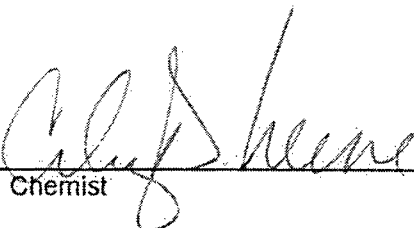
ANALYTICAL RESULTS FOR  
RICE OPERATING COMPANY  
ATTN: HACK CONDER  
122 WEST TAYLOR  
HOBBS, NM 88240  
FAX TO: (575) 397-1471

Receiving Date: 05/03/10  
Reporting Date: 05/05/10  
Project Number: NOT GIVEN  
Project Name: EME L-6  
Project Location: NOT GIVEN

Sampling Date: 05/03/10  
Sample Type: WATER  
Sample Condition: COOL & INTACT  
Sample Received By: JH  
Analyzed By: HM

LAB NO.	SAMPLE ID	Cl <sup>-</sup> (mg/L)	TDS (mg/L)
Analysis Date:		05/04/10	05/04/10
H19801-1	RW-1	11,200	25,000
H19801-2	RW-2	11,400	25,100
Quality Control		500	NR
True Value QC		500	NR
% Recovery		100	NR
Relative Percent Difference		< 0.1	3.1

METHOD: Standard Methods, EPA	4500-Cl/B	160.1
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Chernist

  
Date

H19801 RICE

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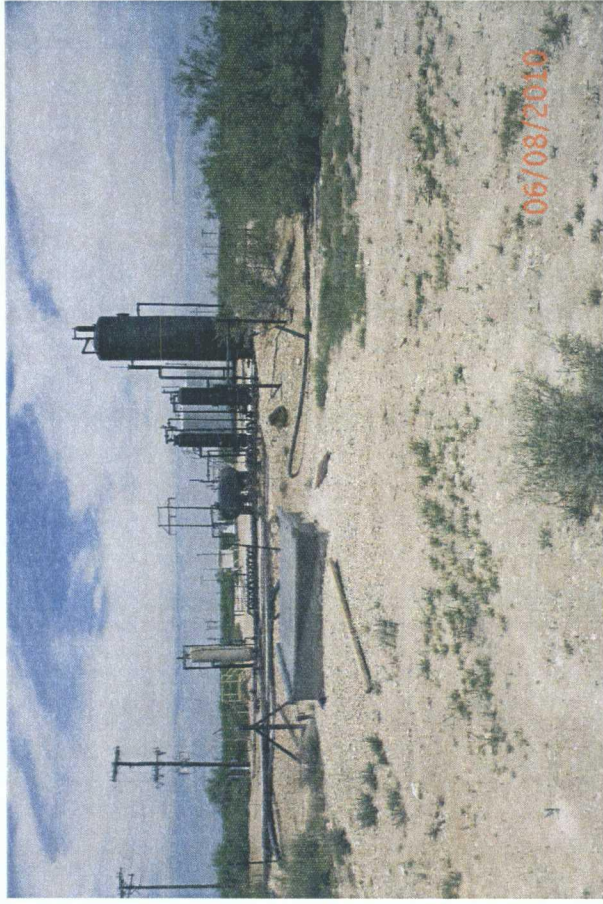
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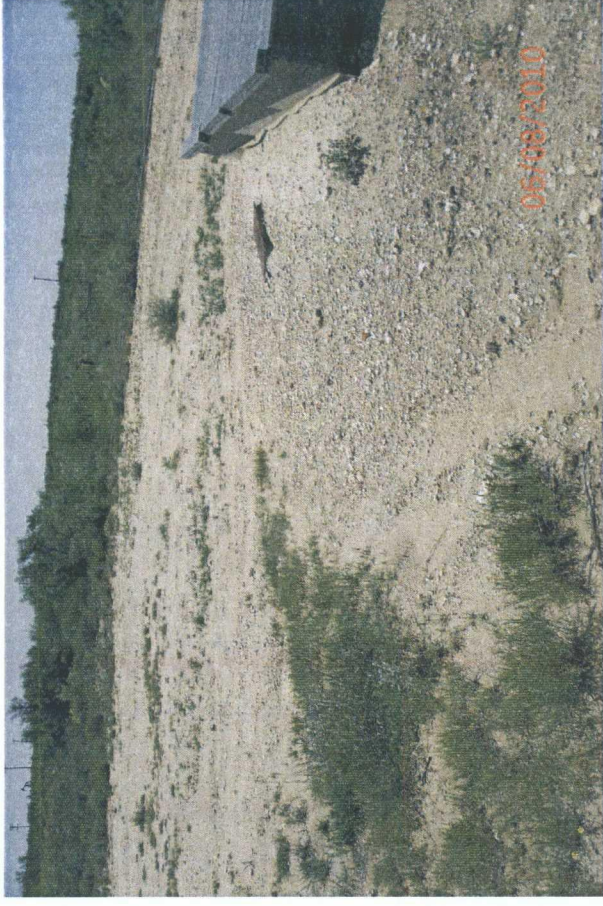
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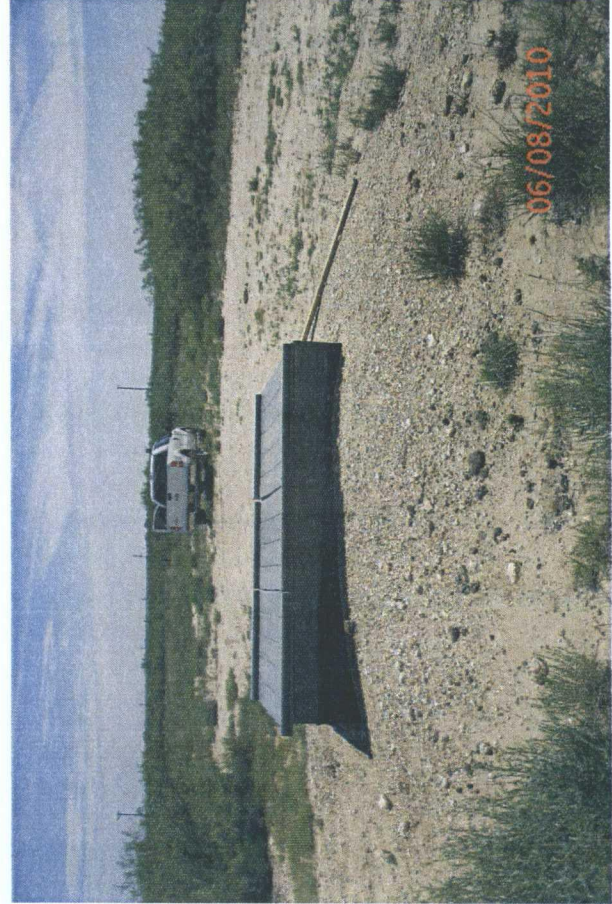
# EME JR Phillips (1R 427-163)



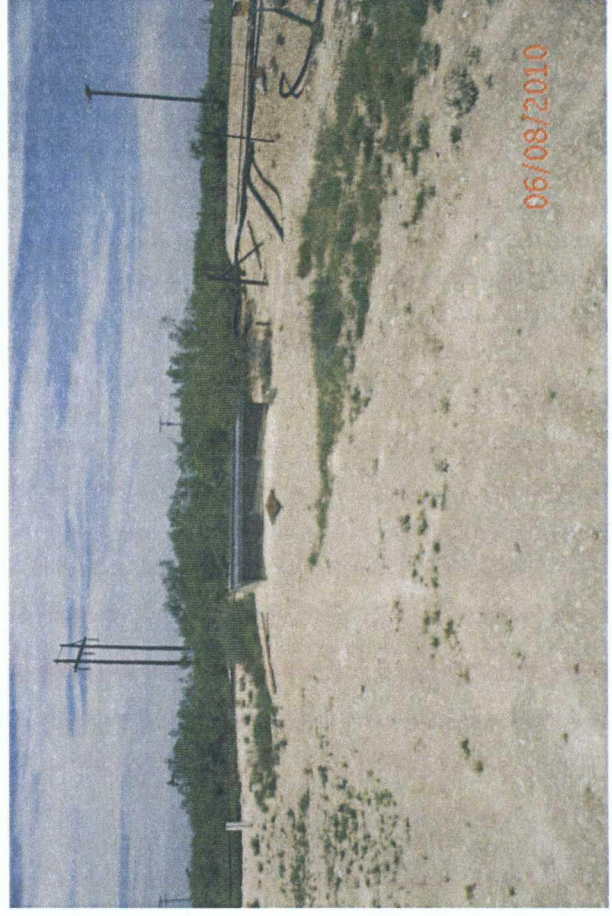
Facing North



Facing South



Facing East



Facing West