

1R - 27

REPORTS

DATE:

8-20-10



CERTIFIED MAIL
RETURN RECEIPT NO. 7010 0290 0003 1264 8980

August 20, 2010

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

RE: **Corrective Action Report and Termination Request**
BD Jct. A-27 Release (1R-27)
T22S-R37E-Section 27, Unit Letter A
Lea County, New Mexico

Mr. Hansen:

As agent for Rice Operating Company (ROC), Trident Environmental submits the following update of the completed corrective actions performed at the above-referenced site and a request for termination. This request documents the completion of corrective actions which were performed in accordance with the NMOCD-approved *Corrective Action Plan* (May 24, 2006) and *Addendum* (May 27, 2010).

On June 10, 2010, ROC completed soil boring SB-9, located between SB-5 and SB-7. The boring was completed to a depth of 30-ft below ground surface (bgs) and confirms that the criteria for chloride delineation have been met in which three consecutive samples showed a decreasing chloride concentration with depth and the last sample at 30-ft bgs having a chloride concentration of 151 mg/kg based on field titration. Laboratory analysis confirmed the 30 ft sample at 32 mg/kg. Photographic documentation of this activity, a lithologic log with chloride concentration data, and the laboratory analytical report are included in Attachment A.

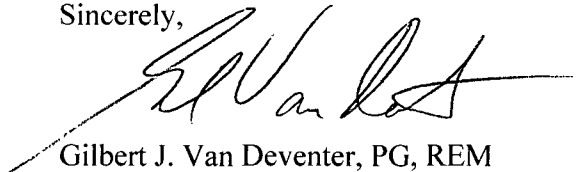
On August 4, 2010, ROC began remediation of the surface water management areas by excavating the three areas to approximately 1.5 ft bgs. The three areas were then scraped and contoured resulting in the east area measuring 480 sq ft, the middle area measuring 150 sq ft., and the west area measuring 312 sq ft. Four loads (48 yd³) were hauled to an OCD-permitted landfarm facility (Sundance Services, Inc.). The three areas were finished by removing rocks and re-seeding of the finished areas was completed on August 12, 2010. Photographic documentation of this activity and a copy of the OCD-approved *Corrective Action Plan Addendum* are included in Attachment B.

ROC is the service provider (agent) for the BD SWD System and has no ownership of any portion of 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.

ROC has met all abatement requirements in accordance with 19.15.29 NMAC, and respectfully requests termination of the regulatory file for this site.

Thank you for your consideration concerning this request for site termination. If you have any questions, please call Hack Conder at (575) 393-9174.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Van Deventer', with a long horizontal flourish extending to the right.

Gilbert J. Van Deventer, PG, REM
Trident Environmental

cc: Hack Conder (ROC)

ATTACHMENT A

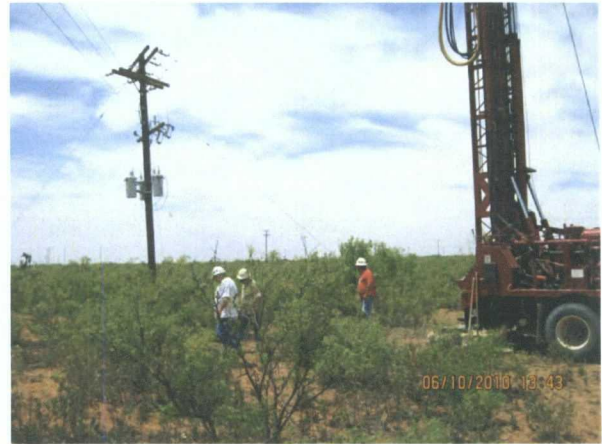
Soil Boring SB-9

- Photographic Documentation
- Lithologic Log
- Laboratory Analytical Report

BD A-27 leak



drilling SB-9



SB-9 in relation to the high line wires



plugging SB-9 in total with bentonite



SB-9 complete

Logger:	Jordan Woodfin
Driller:	Harrison & Cooper
Consultant:	Trident
Drilling Method:	Air Rotary
Start Date:	6/10/2010
End Date:	6/10/2010



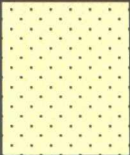




Project Name: BD A-27 leak Well ID: SB-9

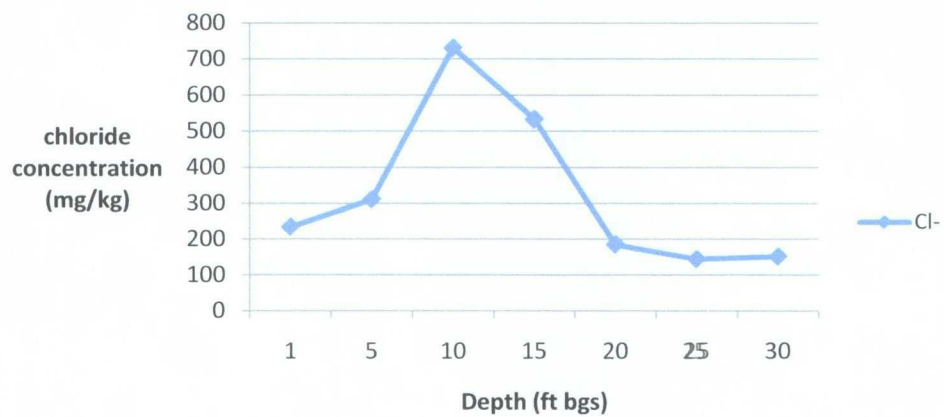
Comments: Located between SB-5 and SB-7.

Location: UL/A, Sec. 27, T22S, R37E
 Lat: 32°22.145' N County: Lea
 Long: 103°08.679' W State: NM

Drafted by: Lara Weinheimer
 TD = 30 ft DGW = 53 ft

Depth (feet)	chloride field tests	LAB	PID	Description	Lithology	Well Construction
				0 - 10 ft SAND reddish brown		 <div data-bbox="1343 1054 1433 1118">bentonite seal</div>
1 ft	234		10.1			
5 ft	311		10.3			
				10 - 15 ft SAND AND CALICHE tan		
10 ft	731	CI-800	2.4			
		GRO <10				
		DRO <10		15 - 20 ft CALICHE hard packed		
15 ft	533		2			
				20 - 30 ft SAND tan		
25 ft	144		1			
30 ft	151	CI-32	5.1			
		GRO <10				
		DRO <10				

Chloride concentration versus depth





PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: HACK CONDER
112 W. TAYLOR
HOBBS, NM 88240

Receiving Date: 06/11/10
Reporting Date: 06/14/10
Project Number: NOT GIVEN
Project Name: BD A-27 LEAK
Project Location: BD A-27 LEAK

Sampling Date: 06/10/10
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: JH
Analyzed By: AB

LAB NUMBER	SAMPLE ID	GRO	DRO	CI*
		(C ₆ -C ₁₀) (mg/kg)	(>C ₁₀ -C ₂₈) (mg/kg)	(mg/kg)

ANALYSIS DATE	06/12/10	06/12/10	06/11/10
H20094-1 SB #9 @ 10'	<10.0	<10.0	800
H20094-2 SB #9 @ 30"	<10.0	<10.0	32
Quality Control	483	444	500
True Value QC	500	500	500
% Recovery	96.6	88.8	100
Relative Percent Difference	1.8	1.1	3.9

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI: Std. Methods 4500-CI'B

*Analyses performed on 1:4 w:v aqueous extracts.

Reported on wet weight.

Chemist

Date

H20094 TCL RICE

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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From: [Hack Conder](#)
To: [Edward J. EMNRD Hansen](#)
Cc: [Katie Jones](#)
Subject: NMOCD 1R-27 (BD A-27 addendum2)
Date: Thursday, May 27, 2010 3:10:44 PM
Attachments: [figure eight.jpg](#)

Mr. Hansen

I am requesting a addendum to the Corrective action Plan for NMOCD 1R-27 (BD A-27) dated May 24, 2006. I would like to include in paragraph two under section Recommendation for Corrective Actions the following.

Perform surface water management in three areas identified on attached figure eight(1 to 2 feet burmed areas) .Drill one confirmatory boring between soil bore 5 and soil bore 7 to minimum depth of 30 feet also shown in figure eight . The criteria to delineate in the soil boring is after three consecutive samples showing a decreasing trend of chloride (Samples taken in 5 feet intervals) and the last sample shows chloride < 250 ppm.

If you have any questions or concerns please contact me.

Hack Conder
Environmental Manager
Rice Operating Company
575-393-9174
fax 575-397-1471

ATTACHMENT B

Surface Water Management Areas

- Photographic Documentation
- Corrective Action Plan Amendment

BD A-27 leak (1R27)



scraping the surface water management areas



digging the surface water management areas



removing rocks



middle surface water management area complete



east surface water management area complete



west surface water management area complete



seeding the site

08/12/2010



raking in seed






08/12/2010



122 W. Taylor
Hobbs, NM 88240
Phone (575) 393-9174
Fax (575) 397-1471

BD A-27 leak

Legals: UL/A sec. 27 T22S R37E
NMOCD Case #: 1R27
Owner: I. Boyd

-  Leak extent
-  Surface water management areas
-  Current watertight junction box
-  Proposed soil bore
-  Soil bores

Drawing date: 5-26-2010
Revision date:
Drafted by: Lara Weinheimer



figure eight.jpg	Content-Description: figure eight.jpg
	Content-Type: image/jpeg
	Content-Encoding: base64

Hansen, Edward J., EMNRD

From: Katie Jones [kjones@riceswd.com]
Sent: Tuesday, August 24, 2010 2:37 PM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder
Subject: BD A-27 (1R27) CAP Report and Termination Request Additional Information

Mr. Hansen,

Between August 30-31, 2005, SB-1 through SB-8 were drilled at BD A-27 leak (1R27). Upon completion, each soil bore was plugged with bentonite (photo documentation is included below). If you have any questions or require any additional information, please contact Hack Conder at (575)631-6432.



Thank you.

Katie Jones
Environmental Project Coordinator
RICE Operating Company