

1R - 415

APPROVALS

YEAR(S):

2006

Price, Wayne, EMNRD

From: Price, Wayne, EMNRD
Sent: Thursday, May 25, 2006 11:31 AM
To: Carolyn Doran Haynes; Kristin Pope; Randall Hicks (r@rthicksconsult.com)
Cc: Sheeley, Paul, EMNRD; Johnson, Larry, EMNRD; Patrick B. McMahon (hsncpbm@leaco.net)
Subject: Abo IG pipeline release OCD Case # 1R0415

OCD is in receipt of the April 27, 2006 "Final Closure Report" requesting acceptance of the work completed as of to date. OCD hereby approves of your request with the following conditions:

Provide OCD and the City of Lovington a final report in April of 2008 with the following information:

- color photos demonstrating re-vegetation.
- groundwater results from the monitor wells and lysimeters information.
- Report any exceedance of the groundwater standards.
- Monitoring well plugging proposal.

Please be advised that NMOCD approval of this plan does not relieve the owner/operator of Responsibility should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Wayne Price
Oil Conservation Div.
1220 S. Saint Francis
Santa Fe New Mexico 87505

phone: 505-476-3490
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NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

November 04, 2005

Carolyn Doran Haynes
Rice Operating Company
122 West Taylor
Hobbs, New Mexico 88240

Re: ABO 1G Release Site OCD Case #1R0415
Unit Letter G, Sec. 1, T17S, R36E
Lea County, NM

Dear Ms. Haynes:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of Rice Operating Company's (ROC) second "Amended Corrective Action Plan" dated August 2005 submitted by R.T. Hicks Consultants, Ltd. OCD hereby approves of the plan with the following conditions:

1. Remove a minimum of five (5) feet of soil in all impacted areas and dispose of at an approved OCD site.
2. Install a clay barrier over any area where the chlorides remaining in the vadose exceeds 1000 mg/kg. The barrier design shall be pursuant to Item 5.d. of the plan and shall extend at a minimum of three (3) feet horizontally over impacted areas.
3. Backfill over the barrier area with a minimum of three (3) feet of clean soil that will support vegetation.
4. Re-vegetate, and fence per item 5.f. of the plan. The area should be initially watered to enhance plant growth.
5. The on-site monitor well shall be maintained for two years, sampled and analyzed quarterly for chlorides. If chlorides exceed the WQCC groundwater standards then ROC shall report pursuant to Rule 116. The results of the sample shall be submitted to the OCD and the city of Lovington every quarter.

6. Submit a closure plan for OCD approval by Jan 31, 2006. Please include photos of the project, sample results to-date, and written summary of the project. A copy of the plan shall be submitted to the City of Lovington.

Sincerely;

A handwritten signature in cursive script, appearing to read "Daniel Sanchez", followed by a long horizontal line extending to the right.

Daniel Sanchez- Compliance and Enforcement Manager

cc: OCD Hobbs Office
 City of Lovington, NM

Price, Wayne, EMNRD

From: Price, Wayne, EMNRD
To: Carolyn Doran Haynes; Sanchez, Daniel J., EMNRD; Anderson, Roger, EMNRD
Cc: 'Kristin Farris Pope'; 'Randall Hicks'; hsnpcbm@leaco.net
Subject: RE: ABO 1G site
Attachments:

Sent: Tue 7/19/2005 8:22 AM

OCD hereby approves of the path forward plan with the results and remediation plan due August 12, 2005.

Please be advised that NMOCD approval of this plan does not relieve (Rice Operating Company) of responsibility should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve (Rice Operating Company) of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Wayne Price-Senior Environmental Engr.
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From: Carolyn Doran Haynes [mailto:cdhricswd@valornet.com]
Sent: Mon 7/18/2005 5:13 PM
To: Price, Wayne, EMNRD; Sanchez, Daniel J., EMNRD; Anderson, Roger, EMNRD
Cc: 'Kristin Farris Pope'; 'Randall Hicks'
Subject: ABO 1G site

Wayne Price, Roger Anderson and Daniel Sanchez:

Thank you for your time and attention for Friday's meeting.

Wayne, I called you earlier in the day and left a message for you to call at your convenience concerning the ABO 1G Release Site. I have also not been able to connect with the major System Partners, leaving messages both on the land and cell lines.

If the following activities meet with your approval, this will be the immediate path forward to perform additional delineation at the site for the historical leak and surface:

- July 15: The One Call was made so excavation for delineation can begin by the 20th
- July 20-22: The site will be marked for grid-lines and the surface sampled for an overall surface chloride snapshot
- July 25-29: A track hoe will be available to start excavation trenching to 20' BGS - top to bottom, side to side of the site
- July 25-29: Field chloride analysis will be conducted on samples at 2' intervals, or as applicable
- Aug 1-3: With this additional site information, chloride loads will be recalculated

Aug 3-10: Simulations of HYDRUS 1D modeling using various excavation and moisture barrier scenarios

Aug 10-12: Wrap-up information, conclusions, path forward

Aug 12: Report Results and propose site remediation plan to NMOCD

As always, for all significant activities at the site, Rice will be giving advance notice to the NMOCD and City of Lovington.

If this meets with your approval, Rice will proceed with notifying the City of Lovington.

Carolyn Doran Haynes

Engineering Manager

RICE *Operating Company*

505-393-9174

505-397-1471 (fax)