

1R - 499

REPORTS

DATE:

6-21-11

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**Texerra**

75 Wuthering Hts Drive Colorado Springs, CO 80921  
Tel: 719-339-6791 E-mail: [lpjg@texerra.com](mailto:lpjg@texerra.com)

June 21<sup>st</sup>, 2011

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: TERMINATION REQUEST  
Rice Operating Company – BD SWD System  
BD P-19 EOL (1R-499): UL/P sec. 19 T21S R37E

Sent via E-mail and Certified U.S. Mail w/ Return Receipt No. 7011 0110 0001 5863 4790

Mr. Hansen:

RICE Operating Company (ROC) has retained Texerra to address potential environmental concerns at the above-referenced site in the BD Salt Water Disposal (SWD) system. ROC is the service provider (agent) for the BD SWD System and has no ownership of any portion of the pipeline, well, or facility. The system is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage/usage basis.

#### *Background and Previous Work*

The site is located approximately 3 miles west-northwest of Eunice, New Mexico at UL/P sec. 19 T21S R37E as shown on the Site Location Map (Figure 1).

On July 17th, 2004, ROC discovered a leak of produced water. Approximately 675 barrels of produced water were estimated to have been released, pooling in down-gradient low-lying areas before being removed by a vacuum truck. An initial C-141 was submitted to NMOCD on June 27th, 2008 (Figure 2). As depth to groundwater is greater than 100 ft, the potential for groundwater impact from this relatively small spill is exceedingly slight. On January 7th, 2011, ROC submitted a CAP to NMOCD which was approved on February 21st, 2011.

#### *CAP Work*

As part of the approved CAP, ROC scraped the upper six inches of soil from the affected areas outside of the caliche lease road and disposed of the material at a NMOCD approved disposal facility on June 15th, 2011. A total of 48 yards were taken to Sundance Services for disposal. 72 cubic yards of clean soil was imported from Wallach in Eunice to the site, spread over the scraped areas and contoured to the natural terrain (Appendix A). Hay was mixed into the topsoil and the site was seeded with native vegetation (Appendix B). A silt

RECEIVED  
2011 JUL 7 A 11:30

RECEIVED OGD  
2011 JUL -7 A 11:30

**Rice Operating Company – BD P-19**

net fencing was placed around the scraped areas to provide a windbreak to allow the seed to remain in place.

Re-vegetation of the ground surface will limit infiltration of precipitation and the subsequent migration of chlorides to groundwater. Plants capture water through their roots, thereby reducing the volume of water infiltrating below the root zone. This natural “infiltration barrier” helps protect groundwater as the decreased flux of water through the subsurface slows the transportation rate of residual chloride.

These activities have met the work plan outlined in the Corrective Action Plan. Therefore, we request that the site be granted termination status of the regulatory file.

Texerra appreciates the opportunity to work with you on this project. Please call Hack Conder at (575) 393-9174 or me if you have any questions or wish to discuss the site.

Sincerely,



L. Peter Galusky  
Texerra

Attachments (in separate .pdf file) :

Figure 1 – Site Location Map

Figure 2 – Initial C-141

Appendix A – Laboratory analysis of the backfill and PID sheet

Appendix B – Re-vegetation form and Photo documentation

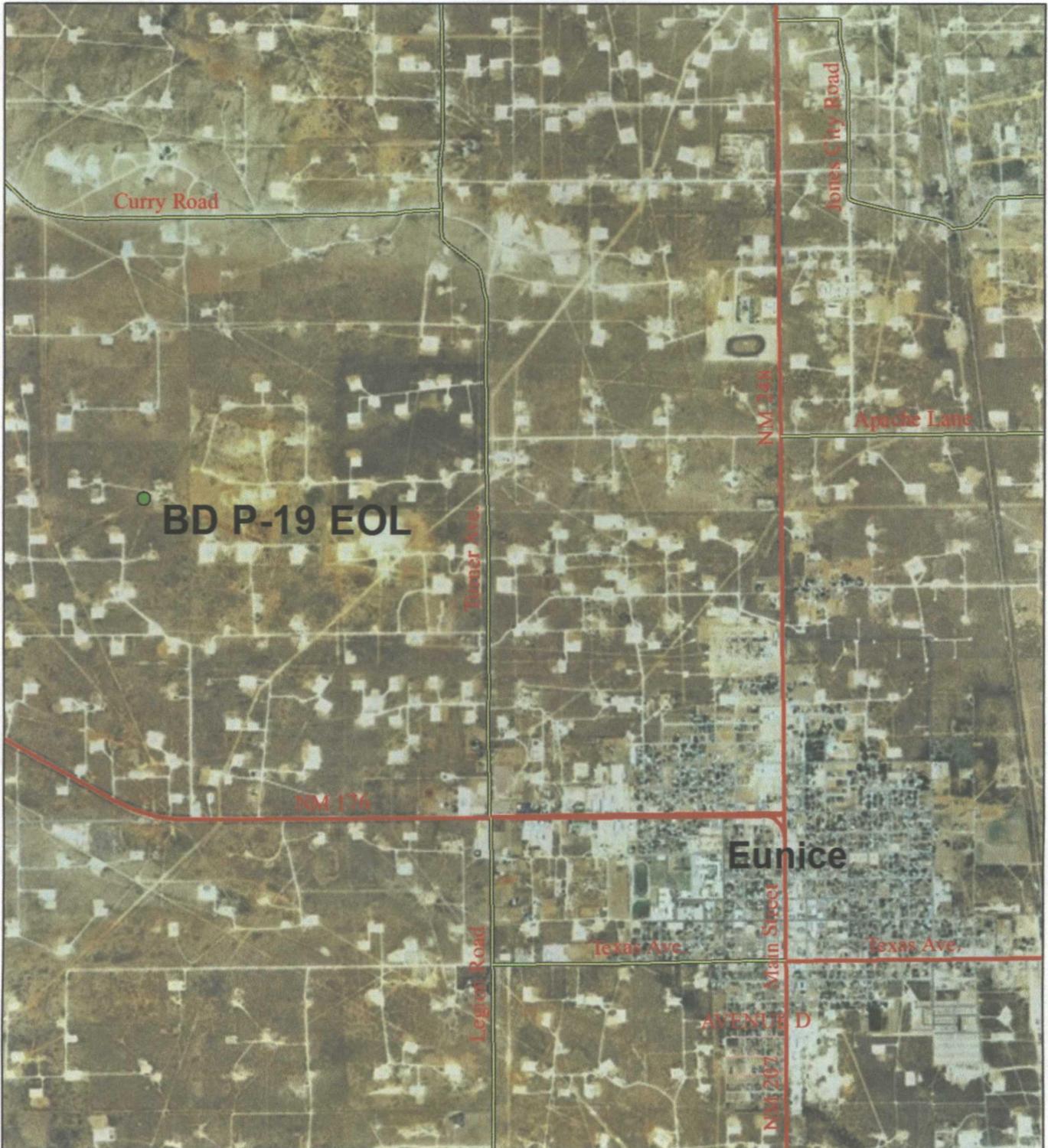


# Figures

**RICE Environmental Consulting and Safety (RECS)**

P.O. Box 5630 Hobbs, NM 88241  
Phone 575.393.4411 Fax 575.393.0293

# Site Map

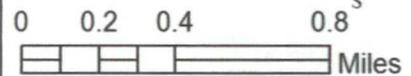


## ***BD P-19 EOL***

UL/P SECTION 19  
T-21-S R-37-E

NMOCD Case #: 1R-499

## Figure 1



Drawing date: 6/15/11  
Drafted by: L. Weinheimer

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Form C-141  
Revised October 10, 2003

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

**Release Notification and Corrective Action**

**OPERATOR**

Initial Report  Final Report

Name of Company: <b>Rice Operating</b>	Contact: <b>Tony Grieco</b>
Address: <b>122 W. Taylor St., Hobbs, NM 88240</b>	Telephone No.: <b>(505) 393-9174</b>
Facility Name: <b>BD</b>	Facility Type: <b>Salt Water Gathering System</b>

Surface Owner: <b>Millard Deck</b>	Mineral Owner: <b>BLM</b>	Lease No.
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**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<b>P</b>	<b>19</b>	<b>21S</b>	<b>37E</b>					<b>Lea</b>

Latitude: **32°27.477N** Longitude: **103°11.738W**

**NATURE OF RELEASE**

Type of Release: <b>Produced water</b>	Volume of Release: <b>685 bbls</b>	Volume Recovered: <b>685 bbls</b>
Source of Release: <b>A four-inch PVC 45 degree 'L' failed</b>	Date and Hour of Occurrence: <b>7/17/04 7:30 AM</b>	Date and Hour of Discovery: <b>7/17/07 7:30 AM</b>
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*: **A four inch PVC 45 degree 'L' failed. A new 'L' was installed as a permanent repair.**

Describe Area Affected and Cleanup Action Taken.\*: **A vacuum truck was dispatched which recovered and properly disposed 685 bbls of fluid. A total of 30 yds of impacted soil were removed to Sundance disposal facility, and 36 yds of clean material were imported.**

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature:		<b>OIL CONSERVATION DIVISION</b>	
Printed Name: <b>Tony Grieco</b>		Approved by District Supervisor:	
Title: <b>Environmental Tech</b>		Approval Date:	Expiration Date:
E-mail Address: <b>tgrieco@riceswd.com</b>		Conditions of Approval:	Attached <input type="checkbox"/>
Date: <b>6/27/08</b> Phone: <b>(505) 393-9174</b>			

\* Attach Additional Sheets If Necessary

Figure 2



# Appendix A

Laboratory analysis of the backfill and PID sheet

**RICE Environmental Consulting and Safety (RECS)**

P.O. Box 5630 Hobbs, NM 88241

Phone 575.393.4411 Fax 575.393.0293



June 17, 2011

Hack Conder  
Rice Operating Company  
112 W. Taylor  
Hobbs, NM 88240

RE: MAJOR PROJECT BD P-19 EOL

Enclosed are the results of analyses for samples received by the laboratory on 06/15/11 16:45.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method SW-846 8260	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method TX 1005	Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene  
Lab Director/Quality Manager

**Analytical Results For:**

 Rice Operating Company  
 Hack Conder  
 112 W. Taylor  
 Hobbs NM, 88240  
 Fax To: (575) 397-1471

Received:	06/15/2011	Sampling Date:	06/15/2011
Reported:	06/17/2011	Sampling Type:	Soil
Project Name:	MAJOR PROJECT BD P-19 EOL	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: IMPORTED SOIL COMP (H101251-01)**

Chloride, SM4500CI-B

mg/kg

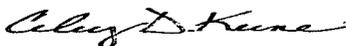
Analyzed By: HM

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>16.0</b>	16.0	06/16/2011	ND	448	112	400	0.00	

Cardinal Laboratories

\*=Accredited Analyte

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 the 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.



Celey D. Keene, Lab Director/Quality Manager

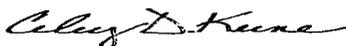
**Notes and Definitions**

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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**Cardinal Laboratories**\*=**Accredited Analyte**

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 the 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.



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**Celey D. Keene, Lab Director/Quality Manager**







# Appendix B

Re-vegetation form and Photo documentation

**RICE Environmental Consulting and Safety (RECS)**

P.O. Box 5630 Hobbs, NM 88241

Phone 575.393.4411 Fax 575.393.0293



112 West Taylor  
 Hobbs, NM 88240  
 Phone: (575) 393-9174  
 Fax: (575) 393-0293

**REVEGETATION FORM**

**1. General Information**

Site Name: BD P-19 EOL						
U/L P	Section 19	Township 21S	Range 37E	County Lea	Latitude N 32°27'28.95	Longitude W 103°11'46.583
Contact Name: Hack Conder						
Email: hconder@riceswd.com						
Site size: 3,324 square feet				Map detail of site attached <input type="checkbox"/>		
Additional information:						

**2. Soils**

Salvaged from site <input type="checkbox"/>	Bioremediated <input type="checkbox"/>	Imported <input checked="" type="checkbox"/>	Blended <input type="checkbox"/>	Depth (in.):	
Texture:	Describe soil and subsoil:				
Soil prep methods:	Rip <input type="checkbox"/>	Depth (in.):	Disc <input type="checkbox"/>	Depth (in.):	Rollerpack <input type="checkbox"/>
Date complete: 6/16/2011					

**3. Bioremediation**

Fertilizer <input type="checkbox"/>	Hay <input checked="" type="checkbox"/>	Other <input type="checkbox"/>
Type:	Peanut Hay	Describe:
Lbs/acre:		

**4. Seeding**

Custom seed mix <input type="checkbox"/>	Prescribed mix <input type="checkbox"/>	Seed mix name: 3.75 lbs Johnson Mix	Seeding date: 6/16/2011
Broadcast <input type="checkbox"/>	Method: hand seeding and hand raking		
Soil conditions during seeding:	Dry <input checked="" type="checkbox"/>	Damp <input type="checkbox"/>	Wet <input type="checkbox"/>
Photos attached <input checked="" type="checkbox"/>	Observations:		

**5. Certification**

Name: Jordan Woodfin	Title: Environmental Tech	Date: 6/16/2011
Signature:		

BD P-19 EOL  
Unit P, Section 19, T21S, R37E



site prior to surface restoration,  
facing south



scraping to a depth of 6 inches,  
facing north



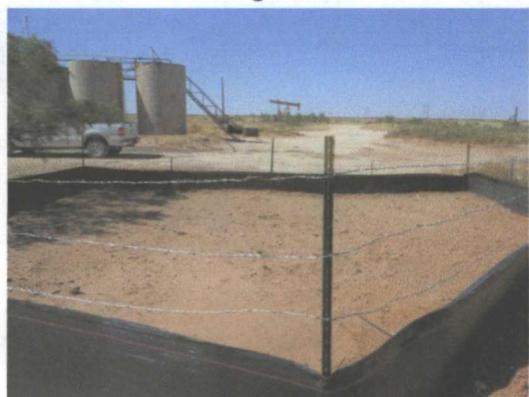
blending the imported soil with peanut hay



backfilling the scraped area,  
facing south



seeding the backfilled area,  
facing south



site complete,  
facing north



site prior to scraping,  
facing northeast



site scraped to a depth of 6 inches,  
facing east



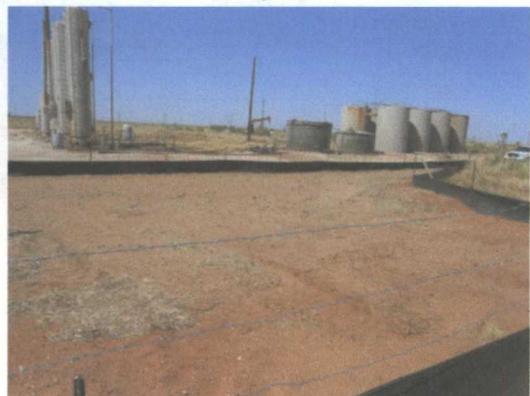
scraping the site to a depth of 6 inches and  
hauling off soil, facing west



backfilling the scraped area,  
facing west



seeding the backfilled area,  
facing south



site complete,  
facing southwest