1R- 459

REPORTS

DATE:

10-10-12

Hansen, Edward J., EMNRD

From: Katie Jones <kjones@riceswd.com>
Sent: Wednesday, October 10, 2012 3:40 PM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder; Laura Pena; Tim Reed
Subject: ROC - BD K-4 (1R0459) Soil Closure Request
Attachments: BD K-4 (1R0459) Soil Closure Request.pdf

Mr. Hansen,

Attached is a Soil Closure Request for the BD K-4 (1R0459) site. A paper copy will be sent via certified mail. If you have any questions or require any additional information please contact myself or Hack Conder at (575)393-9174.

Thank you.

Katie Jones
Environmental Project Manager
RICE *Operating Company*

RICE *Operating Company*
122 West Taylor • Hobbs, New Mexico 88240
Phone: (575) 393-9174 • Fax: (575) 397-1471

CERTIFIED MAIL
RETURN RECEIPT NO. 7007 2560 0000 4569 9385

October 10, 2012

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: Soil Closure Request
BD K-4 leak (1R0459): UL/K, Sec. 4, T22S, R37E
RICE Operating Company – Blinebry-Drinkard SWD System

Mr. Hansen:

Rice Operating Company (ROC) is the service provider (agent) for the BD Saltwater Disposal (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 ownership/usage basis.

Background
On February 25, 2004, a leak was discovered 34 feet east of the K-4 junction box. According to the form C-141 (initial) filed with the New Mexico Oil Conservation Division (NMOCD), the spill was due to a rupture of a 4-inch PVC line.

Initial characterization of soil impacts were conducted at the site on July 14, 2004 using a hollow-stem auger unit to drill one soil boring at the source. The soil boring was advanced to a depth of 80 feet below ground surface (bgs) with field chloride analysis performed on soil samples at five foot intervals. Between October 12 and October 19, 2006, Tetra Tech personnel were onsite to oversee the installation of three monitor wells (MW-1 through MW-3) located within, up and down gradient of the release area. These wells have been sampled on a quarterly basis since installation. Since then, MW-1 has been plugged and replaced with a 4 inch recovery well (RW-1).

On April 23, 2007, ROC submitted a Corrective Action Plan (CAP) for the site and NMOCD approved verbally on December 16, 2009 during the 4th quarterly meeting between NMOCD and ROC. The CAP addressed elevated levels of chlorides within the soil which includes

placement of a barrier at three feet bgs and reseeding the disturbed area with native vegetation. In addition, the CAP proposed limited withdrawal of groundwater from MW-1 in order to attenuate the chlorides within the well.

SOIL

Beginning February 22, 2010, the site was excavated to a depth of 4 ft bgs and a 68 ft x 120 ft liner was installed in the bottom of the excavation. Blended backfill soils were placed over the 20-mil liner. Clean offsite soils were brought to the site to continue backfilling. Imported hay was blended with the existing excavated top soil, placed over the site, and used to backfill the site to ground surface. Silt net fencing was placed around the site and the site was reseeded with native vegetation. A recent photo showing vegetation is attached.

GROUNDWATER

Beginning September 3, 2009, the well has periodically been pumped. Since groundwater recovery began, approximately 287 barrels of groundwater have been recovered and subsequently utilized for pipeline and well maintenance.

A Termination Request was submitted October 13, 2010. NMOCD requested additional pumping and monitoring. The corrective actions for the vadose zone are complete, and ROC respectfully request 'soil closure' or similar closure status. ROC will continue to pump chloride impacted groundwater from MW-1 and to monitor for TDS and chloride in MW-1, MW-2 and MW-3 on a quarterly basis.

Please contact me at (575)393-9174 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

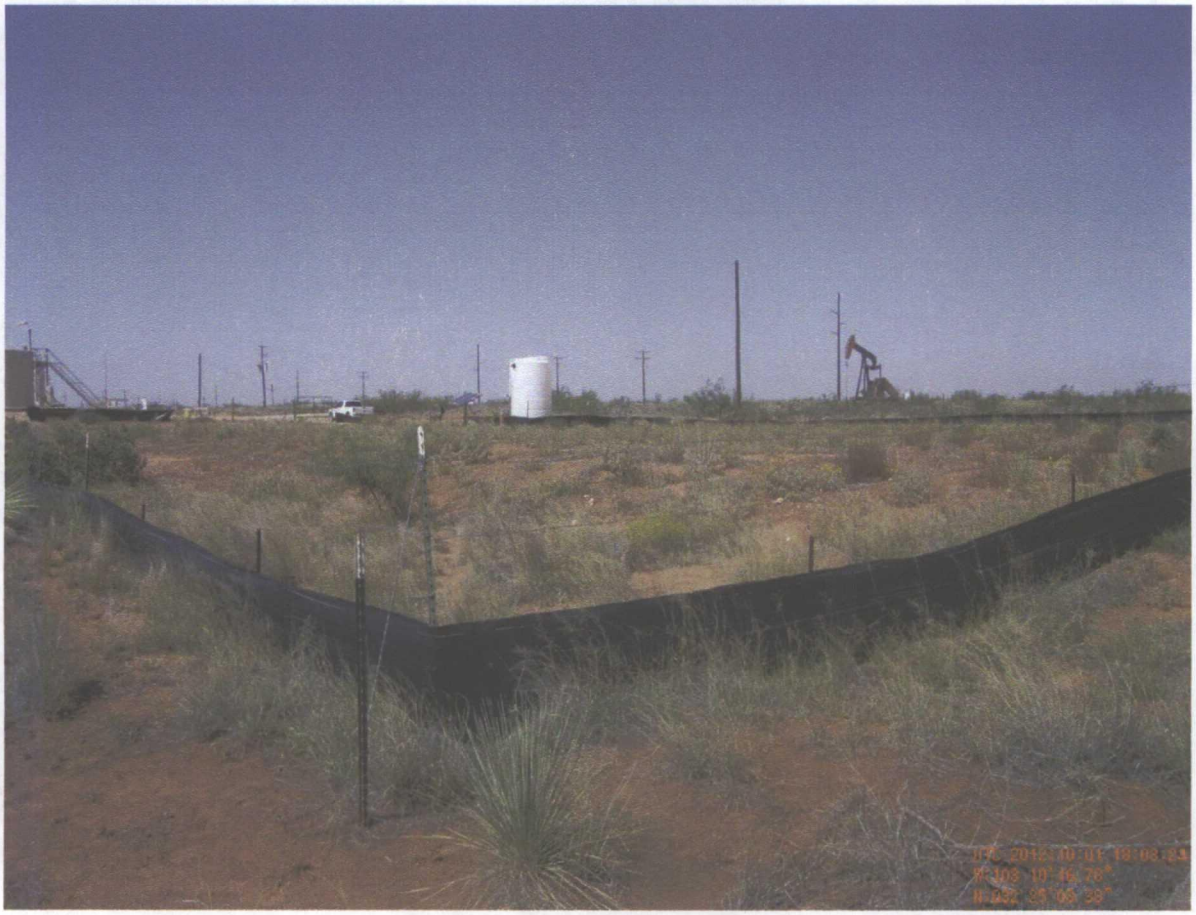
Sincerely,
RICE Operating Company

Hack Conder
Environmental Manager

enclosures

BD K-4 leak (1R0459)

UL/K, Sec. 4, T22S, R37E



Facing West

10/1/2012