

1R - 427-87

REPORTS

DATE:

10-15-12

Hansen, Edward J., EMNRD

From: Katie Jones <kjones@riceswd.com>
Sent: Monday, October 15, 2012 4:23 PM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder; Laura Pena; lpg@texerra.com
Subject: ROC - EME H-20 SWD (1R427-87) Soil Closure Request
Attachments: EME H-20 SWD (1R427-87) Soil Closure Request.pdf

Mr. Hansen,

Attached is a Soil Closure Request for the EME H-20 SWD (1R427-87) 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 0003 0320 5426

October 15, 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
EME H-20 SWD (1R427-87): UL/H, Sec. 20, T20S, R37E
RICE Operating Company – EME SWD System

Mr. Hansen:

Rice Operating Company (ROC) is the service provider (agent) for the Eunice Monument Eumont (EME) 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

The site is located approximately four miles south of Monument in Lea County at UL/H, Sec. 20, T20S, R37E. Groundwater at the site occurs at an approximate depth of 24 +/- feet below ground surface (bgs).

As part of the on-going SWD facility upgrades, ROC removed the two below-grade redwood tanks and closed an emergency overflow pit in April and May 2007. Soils were excavated to approximately three feet below the water table depth. Petroleum contaminated soils were removed from the site and disposed at the South Monument Surface Waste Facility. The removal of contaminated soil

was determined to be complete per sampling of the sidewalls. The excavation then backfilled with clean material per NMOCD approval, and a compacted clay barrier was installed on May 15th, 2007, at a depth of approximately 5.5 to 7 ft below ground surface. The excavation was then backfilled with caliche to ground surface and the site is being utilized as a facility pad. A report detailing the excavation activities was submitted to the NMOCD on August 20, 2007.

Five (5) monitoring wells have been installed at this site since 2007 and have been sampled quarterly since installation. A Corrective Action Plan (CAP) was submitted and approved by the NMOCD on April 16, 2008. The CAP proposed installing two oxygen (air) injection wells up-gradient of the former excavation in order to provide enhanced natural attenuation of groundwater hydrocarbons.

ROC has completed the vadose zone remediation as approved by NMOCD in the CAP. The clay liner will inhibit the migration of any remaining constituents through the vadose zone. As such, ROC requests 'Soil Closure' or similar closure status. ROC will continue monitoring groundwater quality and will continue operation of the bio-sparg system and a report will be submitted to the NMOCD with recommendations.

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

A handwritten signature in black ink, appearing to read "H. Conder", written in a cursive style.

Hack Conder
Environmental Manager

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