1R - 427-03

REPORTS

DATE:
10-15-12

Hansen, Edward J., EMNRD

From: Katie Jones <kjones@riceswd.com>
Sent: Monday, October 15, 2012 2:23 PM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder; Laura Pena; Hall, Sharon
Subject: ROC - EME G-11 (1R427-03) Soil Closure Request
Attachments: EME G-11 (1R427-03) Soil Closure Request.pdf

Mr. Hansen,

Attached is a Soil Closure Request for the EME G-11 (1R427-03) 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 G-11 (1R427-03): UL/G, Sec. 11, T20S, R36E
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 southwest of Monument, New Mexico at UL/G, Sec. 11, T20S, R36E. Groundwater at the site occurs at an approximate depth of 46 +/- feet below ground surface (bgs).

A backhoe was used to excavate soils surrounding the former junction box measuring 30 feet by 30 feet by 18 feet deep. Composite samples were analyzed by a commercial laboratory, yielding slightly elevated chloride concentrations. A 20-mil poly liner was installed at the base of the excavation and up the sidewalls of the excavation. Excavated soils were backfilled into the excavation. The area

was contoured to the surrounding landscape and seeded with native vegetation. ROC disclosed potential groundwater impact at the site to New Mexico Oil Conservation Division (NMOCD) via e-mail on February 24, 2003. A disclosure report was submitted to NMOCD with all the ROC 2003 junction box closures and disclosures.

ROC submitted an ICP to NMOCD on August 9, 2010 and was approved by NMOCD on August 24, 2010. Five soil borings (SB-1 through SB-5) were drilled at the site on October 4 and 5, 2010 and soil samples were collected at regular intervals. A near-source monitoring well (MW-1) and an up-gradient monitoring well (MW-2) were installed at the site on December 7, 2010, to assess groundwater quality. Sampling results from MW-2 confirm that free product is present in groundwater up-gradient of the site. Based on the fact that soil chloride concentrations, as confirmed by laboratory analysis, decrease with depth to below or near 250 mg/kg in all of the soils borings except SB-1 (304 mg/kg at 42 feet) and that free product occurs in the up-gradient monitor well, we believe there is an up-gradient source at this site.

On May 11, 2012, an ICP Report and CAP was submitted to the NMOCD. The plan proposed plugging and abandonment of both monitoring wells (MW-1 and MW-2) and installing a 50x50 ft 20-mil reinforced liner at approximately 4-5 ft bgs. NMOCD approved the report on June 4, 2012, with the condition that ROC continue monitoring MW-1 and check for NAPLs in MW-2.

Beginning June 8, 2012, the site was excavated to dimensions of 50x50x5 ft deep. Soil was imported and a six inch pad was placed in the bottom of the excavation. A 20-mil, reinforced liner was then properly seated in the bottom of the excavation and padded with an additional 6 inches of blow sand. The excavation was then backfilled with imported soil and contoured to the surrounding area. Field sampling of the backfilled surface area yielded a chloride concentration of 169 mg/kg and a PID reading below 100 ppm. Approximately 456 yards^3 of soil were imported to the site, and approximately 832 yards^3 of excavated soil were properly disposed of at a NMOCD approved facility. The site was seeded with a blend of native vegetation and a silt net fence was placed around the area to maintain seed integrity.

ROC has completed the vadose zone remediation as approved by NMOCD in the CAP. The 20-mil, reinforced liner will inhibit the further migration of chlorides through the vadose zone. As such, ROC requests 'Soil Closure' or similar closure status. Photograph documentation and a reveg form are attached. ROC will

continue monitoring groundwater quality 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

Hack Conder
Environmental Manager

enclosures

EME G-11 (1R427-03)

Unit G, Section 11, T20S, R36E

Site prior to excavation, facing west 6/8/2012

Excavating site, facing east 6/12/2012

Liner installed, facing southeast 6/21/2012

Backfilling site 6/21/2012

Tilling and seeding site, facing west 8/17/2012

Site complete, facing west 10/3/2012

PO Box 5630
Hobbs, NM 88241
Phone: (575) 393-4411
Fax: (575) 393-0293

REVEGETATION FORM

1. General Information

Site name	**EME G-11**					
U/L	Section	Township	Range	County	Latitude	Longitude
G	**11**	**20S**	**36E**	**Lea**	**32°35.439'**	**103°17.327'**
Contact Name:	**Bruce Baker**					
Email:	**bbaker@rice-ecs.com**					
Site size: **8,100** square feet				Map detail of site attached ☐		
Additional information:						

2. Soils **Do not rip caliche subsoils; caliche rocks brought to the surface by ripping shall be removed.*

Salvaged from site ☒	Bioremediated ☐	Imported ☒	Blended ☒	Depth (in):
Texture: **Sandy**	Describe soil & subsoil:	**Sandy surface with caliche below**		
Soil prep methods:	Rip ☐ Depth(in):	Disc ☒ Depth (in): **6**	Rollerpack ☐	
Date completed: **8/17/2012**				

3. Bioremediation

Fertilizer ☐	Hay ☐	Other ☐
Type:		Describe:
Lbs/acre:		

4. Seeding **Attach seed bag tags to this form. Seed bag tags shall contain the site name and S-T-R.*

Custom seed mix ☒	Prescribed mix ☐	Seed mix name: **4 lbs. Blue Grama and 4 lbs. Side Oats Grama**	Seeding date: **8/17/2012**
Broadcast ☒ Method: Mechanical spreader/tiller			
Soil conditions during seeding: Dry ☒ Damp ☐ Wet ☐			
Photos attached ☐ Number of photos:	Observations: **Seed was tilled into soil.**		

5. Certification I hereby certify that the information in this form and attachments is true and complete to the best of my knowledge and belief.

Name: **Eduardo Garcia**	Title: **Environmental Tech**	Date: **8/17/2012**
Signature: Eduardo Garcia		