1R - 427-162

REPORTS

DATE:
10-15-12

Hansen, Edward J., EMNRD

From: Katie Jones <kjones@riceswd.com>
Sent: Monday, October 15, 2012 1:36 PM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder; Laura Pena; Lara Weinheimer
Subject: ROC - EME Jct. G-18 (1R427-162) Soil Closure Request
Attachments: EME Jct. G-18 (1R427-162) Soil Closure Request.pdf

Mr. Hansen,

Attached is a Soil Closure Request for the EME Jct. G-18 (1R427-162) 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 Jct. G-18 (1R427-162): UL/G, Sec. 18, T19S, 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 3 miles northwest of Monument, New Mexico at UL/G, Sec. 18, T19S, R37E. Depth to groundwater at this site is approximately 54 +/- ft below ground surface (bgs).

In 2004, ROC initiated work on the former EME G-18 junction box. The site was delineated using a backhoe to collect soil samples at regular intervals. The excavation reached dimensions of 20 ft x 18 ft x 12 ft (bgs). Composite samples were sent to a commercial laboratory for chloride and TPH analyses, resulting in elevated concentration of chloride in the bottom composite, elevated

concentrations of TPH, BTEX above detectable limits. A 1-ft thick clay layer was installed from 6-5 ft bgs, to inhibit further chloride migration and a compaction test was performed on April 16th, 2004. The site was backfilled, the area was contoured to the surrounding landscape and an identification plate was placed on the surface of the site to mark its location for future environmental considerations. A new junction box was not required at the site.

Between June 2nd, 2004 and December 6th, 2010, fives soil bores were drilled at and surrounding the former junction box, and three monitoring wells were also. An ICP Report and CAP was then submitted to the NMOCD, which detailed the findings of the soil borings. The report requested a 6-month source removal and test pumping program and MW-1 be plugged and replaced with a 4 inch well, as well as, a 44x49 ft, 20-mil liner be installed at 4-5 ft bgs. NMOCD approved the plan on July 18, 2011.

SOIL

Beginning on November 23rd, 2011, the site was excavated to 44 ft x 49 ft x 5 ft deep. Excavated soil was blended on site to use as backfill. A composite sample of the blended soil was field tested for hydrocarbons using a PID meter and returned a result of 4.0 ppm. The sample was then sent to a commercial laboratory for analysis of chlorides and returned a result of 80 mg/kg. Clean soil was imported to the site to pad the liner to protect it from punctures. A sample of the imported soil was field tested for hydrocarbons using a PID meter and returned a result of 0.6 ppm. The sample was then sent to a commercial laboratory for analysis of chlorides and returned a concentration below detectable limit. The excavation was padded with six inches of the imported sand and then the liner was properly seated into the excavation at approximately 4.5 ft bgs. The liner was padded on top with six inches of imported sand and then backfilled with the blended soil to six inches bgs. The remaining imported soil was used to complete the backfill and to contour the site to the surrounding area. A total of 132 yards of soil was imported to the site to use as padding and as backfill. The remainder of the blended soil, 228 yards, was taken to a NMOCD approved facility for disposal. The site was seeded with a blend of native vegetation and a silt net fence was placed around the area to maintain seed integrity.

GROUNDWATER

On October 26th, 2011, MW-1 was plugged and abandoned with a 1-3% bentonite/concrete slurry and capped with three feet of concrete. MW-1 was then replaced with a 4 inch well (MW-1R) which was installed 9 ft southeast of the former MW-1. Initial sampling of MW-1R resulted in chloride concentrations below WQCC standards.

Based on the liner installation and low concentrations of chloride in MW-1R, ROC submitted a Vadose Zone Remediation and Termination Request on April 17, 2012, and NMOCD requested an additional two quarters of sampling.

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 into groundwater. As such, ROC requests 'Soil Closure' or similar closure status. A recent photograph showing vegetation is 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 Jct. G-18 (1R427-162)

UL/G, Sec. 18, T19S, R37E

Facing Southwest 10/1/2012