AP - 98

STAGE 1 & 2 WORKPLANS

DATE: 4-23-13

Hansen, Edward J., EMNRD

From: Katie Jones <kjones@riceswd.com>
Sent: Tuesday, April 23, 2013 2:12 PM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder; Laura Pena; L Peter Galusky
Subject: Hobbs Jct. E-4 (AP-98) Termination Request Addendum - Liner Installation
Attachments: Hobbs Jct. E-4 (AP-98) Proposed Liner Dimensions.jpg

Mr. Hansen,

ROC submits the following as an Addendum to the Hobbs Jct. E-4 (AP-98) Termination Request previously submitted to NMOCD on October 4, 2012.

A Termination Request Addendum was submitted to the NMOCD on March 27, 2013. That Addendum gave a description of the substance found on MW-1 and MW-2, describing it as a non-aqueous liquid, which has been identified through sampling to be consistent with light end condensate fluid. It also described the soil chloride, BTEX, and TPH concentrations found at the Hobbs Jct. E-4 site. Based on the low concentrations observed in the soil, ROC believed the light end condensate fluid was contributed to the groundwater from a non-ROC up-gradient site. At least 14 monitoring wells were found to be located up-gradient (northwest), north, and northeast of the site.

Nevertheless, ROC requests to install a 20x60-ft, 20-mil reinforced liner at a depth of 4-5 ft bgs, as shown on the attached plat. A 20-mil reinforced liner will inhibit the downward migration of residual chlorides and hydrocarbons. The liner will cover the area with the highest BTEX reading, MW-1 and SB-1. The excavation will be backfilled with soil containing a chloride concentration less than 500 mg/kg and a field PID reading below 100 ppm. The excavated soil will be evaluated for use as backfill, and any soil requiring disposal will be properly disposed of at a NMOCD approved facility. The backfilled site will then be seeded with a blend of native vegetation, and soil amendments will be added as necessary. Vegetation will act as an evapo-transpiration barrier that will also inhibit the downward migration of chlorides and hydrocarbons. Plants capture water through their roots and so reduce the amount of water infiltrating below the root zone.

ROC also requests to plug and abandon the monitoring wells located at this site (MW-1, MW-2, MW-3, MW-4, and MW-5). Each well will be plugged using a 1-3% bentonite/concrete slurry and a three foot cap of cement.

Upon approval of this Addendum, ROC will plug and abandon the monitoring wells and will schedule the liner installation.

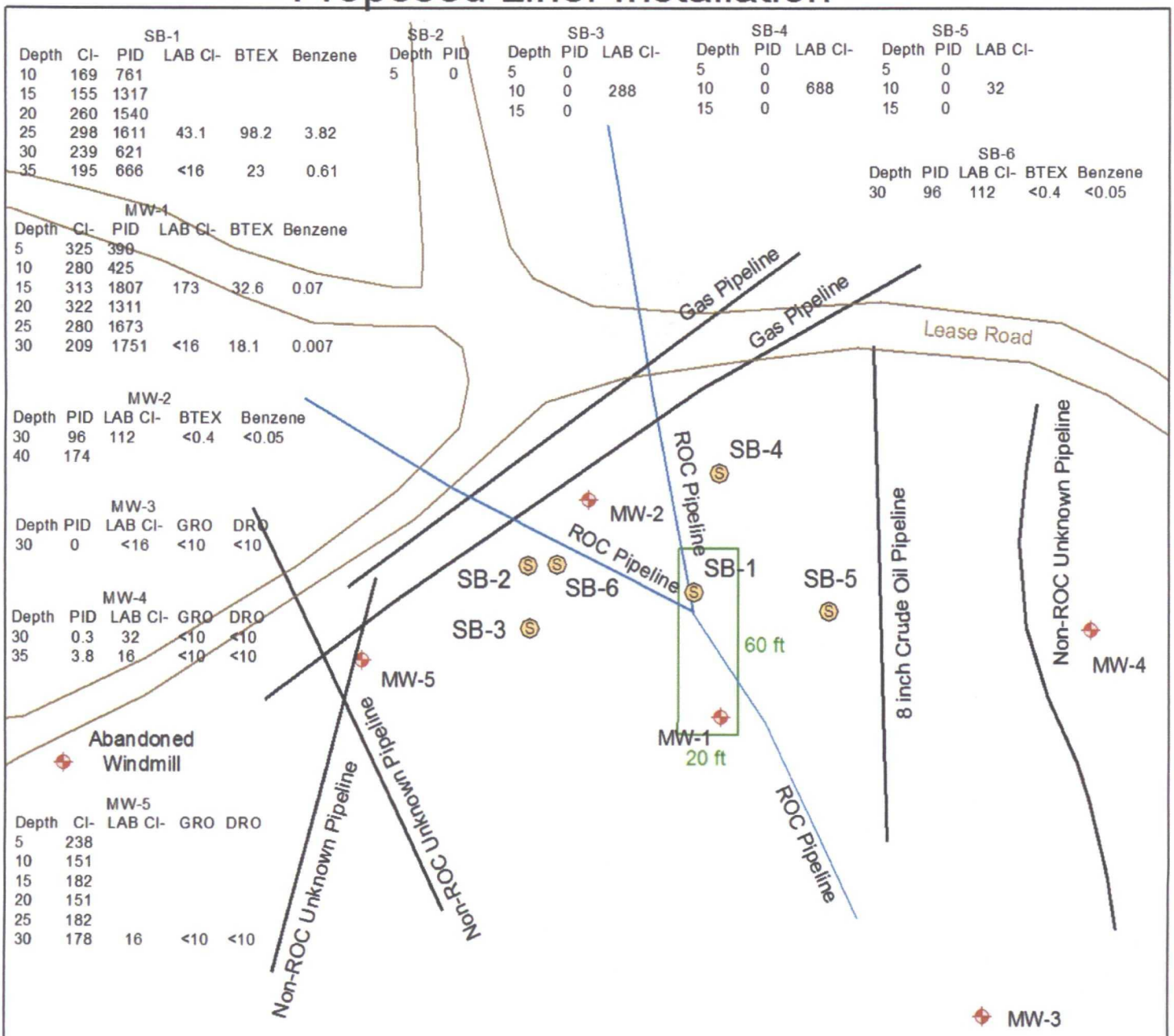
ROC is the service provider (agent) for the abandoned Hobbs SWD System and has no ownership of any portion of the pipeline, well, or facility. The system is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis.

If you have any questions or require any additional information, please contact Hack Conder at (575)631-6432.

Thank you.

Katie Jones
Environmental Project Manager
RICE *Operating Company*

Proposed Liner Installation



Legend

- SOIL BORES
- MONITOR WELLS
- PROPOSED 20-mil REINFORCED POLY LINER @ 4-5 ft

DGW = 42 ft

RICE ENVIRONMENTAL RECS CONSULTING & SAFETY, LLC

Hobbs jct. E-4

Legals: UL/E sec. 4
T19S R38E
NMOCD Case #: AP-98

N W E S

0 20 40 80 Feet

Drawing date: 4/9/13
Drafted by: L. Weinheimer