

1R-426-214

**GENERAL
CORRESPONDENCE**

YEAR(S):
2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, May 06, 2013 10:47 AM
To: Hack Conder (hconder@riceswd.com)
Cc: Leking, Geoffrey R, EMNRD; Katie Jones <kjones@riceswd.com> (kjones@riceswd.com);
Laura Pena (lpena@riceswd.com)
Subject: Remediation Plan (1R426-214) Further Information Required - ROC BD F-26 Vent Site

**RE: ICP Report and Corrective Action Plan
for the Rice Operating Company's
BD F-26 Vent Site
Unit Letter F, Section 26, 21S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R426-214) Further Information Required**

Dear Mr. Conder:

The New Mexico Oil Conservation Division (OCD) has received Rice Operating Company's (ROC) proposed corrective action plan for the above-referenced site (dated April 18, 2013). The plan indicates that additional information is required. Therefore, the OCD cannot approved the proposed plan for the remediation plan at this time:

ROC must address the possible release of chlorides from the vadose zone into groundwater even after the liner is installed (i.e., from the bottom 10' of the vadose zone). At this site SB-2 indicates elevated chloride concentrations at the bottom 10 feet of the vadose zone. Therefore, using a 10' x 10' area around SB-2 and the bottom 10' at SB-2, there would be 1,000 cubic feet of soils (or 50,000 Kg using 110 pound / cubic foot) that could release chlorides into groundwater. At 50,000 Kg of soils and 4,671 mg/Kg chloride in soils (the average 3,821 mg/Kg chloride at a depth of 35', an estimate base upon the difference between the field data and laboratory data for the results at 40', and 5,520 mg/Kg chloride at a depth of 40') there is an additional **233 Kg** of chloride that could be released to groundwater.

If you have any questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau