1R - 426-117

REPORTS

DATE:

9-24-09

Hansen, Edward J., EMNRD

From: lpgalusky@alumni.virginia.edu on behalf of L Peter Galusky Jr @ Texerra [lpg.texerra@gmail.com]
Sent: Thursday, September 24, 2009 3:08 PM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder; Katie Jones
Subject: NMOCD Case No. 1R426-117 - Rice Operating Company - BD Oxy Owen A
Attachments: BD Oxy Owen A ICP Report follow-up 09.24.09c lpg.pdf

Edward,

Please find attached (in .pdf format) the results of the follow-up soil evaluation that we discussed for the above-referenced project.

Thank you for your review and consideration.

Sincerely,

Pete G.
Texerra
Cell: 432-634-9257

--
L Peter Galusky, Jr
lpgalusky@alumni.virginia.edu

L. Peter Galusky, Jr. Ph.D., P.G.
Texerra

505 N Big Spring, Suite 404 Midland, Texas 79701
Tel: 432-634-9257 E-mail: lpg@texerra.com

September 24th, 2009

Mr. Edward Hansen
New Mexico Energy, Minerals, & Natural Resources
Oil Conservation Division, Environmental Bureau
1220 S. St. Francis Drive
Santa Fe, New Mexico 87504

Re: Rice Operating Company-wide Case Study of Residual Soil Petroleum Hydrocarbons
In regard to NMOCD Case No. 1R426-117 (BD Oxy Owen A)

Sent via E-mail

Dear Mr. Hansen:

In follow-up to our meeting earlier this month and per your request, we sampled soils from a backhoe excavation to the west of the former junction box locations between these and an adjacent oil production battery (Figures 1 & 2). A trench was excavated to a depth of approximately 10 ft. (Safety concerns precluded going deeper due to the risks of shaking the earth in the immediate proximity of active production pipelines.)

The excavated soils exhibited strong and increasing petroleum odor and visual evidence of petroleum contamination from approximately three feet below ground surface (bgs) to the limit of excavation at ten feet (Figures 3 & 4). Laboratory analysis indicated increasing hydrocarbon contamination eight to ten feet bgs (Figure 5). The combined DRO+GRO concentration at ten feet bgs totaled approximately 2,600 ppm at ten feet bgs. Soil chloride levels measured 576 ppm at this depth.

We believe that these observations and data support the assertion made in our previous submittals[1] that the petroleum hydrocarbons found beneath the former junction boxes have migrated there from an off-site location. We therefore respectfully request that OCD grant remediation termination or similar closure status to this project.

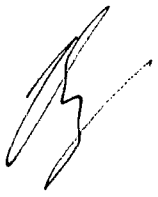
Rice Operating Company is the service provider (agent) for the BD Salt Water Disposal (SWD) System and has no ownership of any portion of pipeline, well or facility. The BD

[1] BD Oxy Owen A ICP Report and Termination Request 04.07.09
BD Oxy Owen A ICP Report and Termination Request – Follow-up 09.17.09

SWD System is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis.

We appreciate your consideration of this request.

Sincerely,



L. Peter Galusky, Jr.

Copy: Rice Operating Company

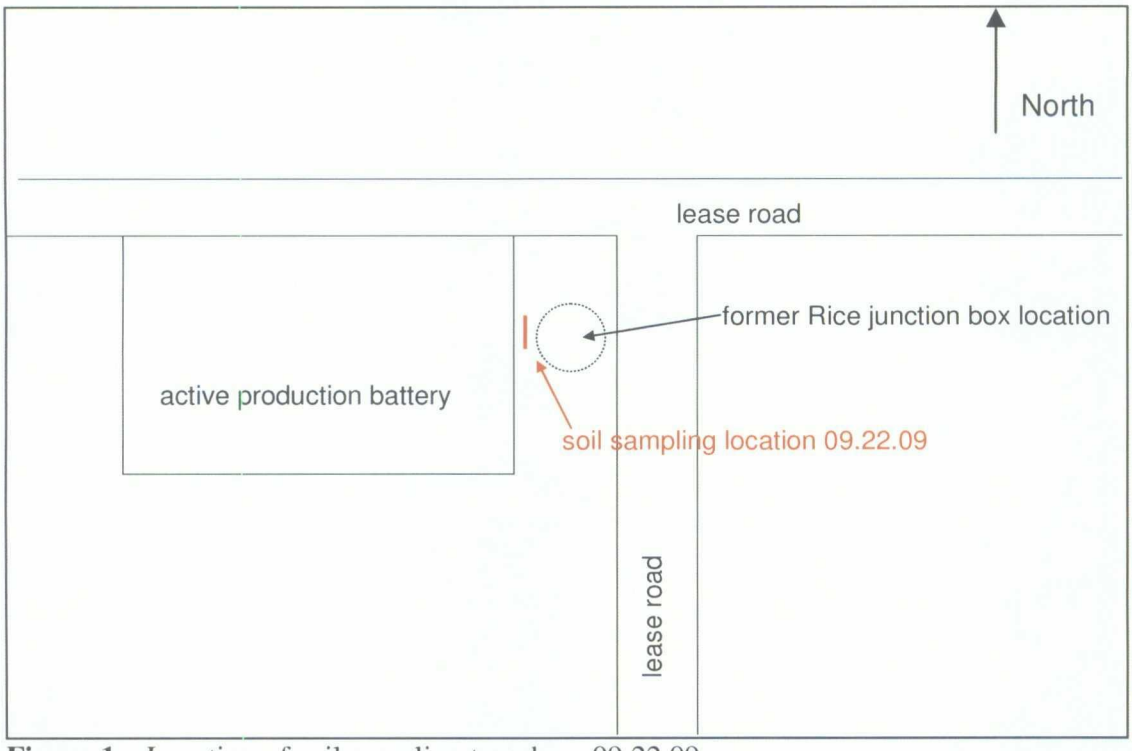


Figure 1 – Location of soil sampling trench on 09.22.09.

Figure 2 – Photograph of the same looking west.

Figure 3 – View of open backhoe trench showing oil contaminated soil with depth.

Figure 4 – View soil from bottom of sampling trench showing oil contaminated soil.

CARDINAL LABORATORIES

PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: DARNELL MITCHELL
122 W. TAYLOR
HOBBS, NM 88240

Receiving Date: 09/22/09
Reporting Date: 09/23/09
Project Number: NOT GIVEN
Project Name: VERTICLE SAMPLE POINT #1 @ 8FT & 10FT
Project Location: B.D. OXY OWENS A-EOL

Sampling Date: 09/22/09
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: ML
Analyzed By: AB/ZL/HM

LAB NO. SAMPLE ID	GRO (C_6-C_{10}) (mg/kg)	DRO (>C_{10}-C_{28}) (mg/kg)	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL BENZENE (mg/kg)	TOTAL XYLENES (mg/kg)	Cl* (mg/kg)
ANALYSIS DATE:	09/22/09	09/22/09	09/23/09	09/23/09	09/23/09	09/23/09	09/23/09
H18292-1 VERTICLE SAMPLE PT #1 @ 8FT	714	1,170	<0.100	0.410	3.22	7.93	448
H18292-2 VERTICLE SAMPLE PT #1 @ 10FT	719	1,880	<0.100	0.368	3.29	8.06	576
Quality Control	474	434	0.045	0.050	0.050	0.141	500
True Value QC	500	500	0.050	0.050	0.050	0.150	500
% Recovery	94.8	86.8	90.0	100	100	94.0	100
Relative Percent Difference	1.5	2.4	3.8	3.9	3.9	2.7	<0.1

METHODS: TPH GRO & DRO - EPA SW-846 8015 M; BTEX - SW-846 8021B; Cl-: Std. Methods 4500-Cl-B
*Analyses performed on 1:4 w:v aqueous extracts. Reported on wet weight.

TEXAS NELAP CERTIFICATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE, AND TOTAL XYLENES. Not accredited for GRO/DRO and Chloride.

Lab Director

09/23/09
Date

H18292 TBCL RICE

Figure 5 – Laboratory analyses of soil samples taken on 09.22.09.