

1R - 426-99

WORKPLANS

Date:

12-22-10

Hansen, Edward J., EMNRD

From: Katie Jones [kjones@riceswd.com]
Sent: Wednesday, February 02, 2011 9:56 AM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder; lpg@texerra.com
Subject: BD O-23 vent (1R426-99) CAP Addendum
Attachments: BD O-23 vent (1R426-99) SB-8 log.pdf; BD O-23 vent LAB 1.13.11.pdf; BD O-23 vent (1R426-99) SB-8 photos.pdf; BD O-23 vent (1R426-99) MW-1R installation photos.pdf; BD O-23 vent (1R426-99) Proposed Liner.jpg; BD O-23 vent (1R426-99) Chloride Mass - Table 1 01.31.11.xls

Mr. Hansen,

This email is an Addendum to the BD O-23 vent site (1R426-99) Corrective Action Plan (CAP), submitted to the NMOCD on December 22, 2010. In an email dated January 11, 2011, NMOCD requested ROC determine the extent of the release to the north of SB-2. On January 13, 2011, SB-8 was drilled approximately 15 ft north of SB-2 and MW-1 was replaced with MW-1R, a 4 inch well. MW-1 was plugged on January 21, 2011 using a cement grout with 1-3% bentonite and a 3 ft cap of cement. Based on the findings in SB-8, ROC requests the following as an Addendum to the CAP. SB-8 log, lab results, photos, a new plat showing the proposed liner location, and a new table showing chloride mass calculations are attached. If you need any further information, please let me or Hack Conder know.

Page 1, paragraphs 2 and 3: text in blue lettering, below, will be added to the paragraph. Red lettering marked with a strike-through will be deleted.

“Groundwater chloride concentrations were found on October 13th to measure 4,400 mg/l from (a more recently installed) up-gradient monitor well (MW-2) and to measure 7,000 mg/l from the original near-source/down-gradient monitor well (MW-1) on the same date. Monitor well locations are shown in Figure 2 and groundwater laboratory data are given in Figures 3 & 4. It is apparent that although the up-gradient groundwater quality is impaired before it moves across the location it has also been affected by the downward migration of residual soil chlorides from the site. This is supported by the elevated levels of residual soil chlorides measured across the site during a soils evaluation conducted on February 23rd and March 17th, 2010 and January 13th, 2011 (Figure 5). We estimate the residual mass of contributed chlorides to be approximately ~~7,340~~7,733 lbs from the bottom 10 ft interval of the unsaturated zone and approximately ~~995~~1,160 lbs in the affected groundwater beneath the site, based on the attached chloride mass calculations (Table 1).

Texerra recommends and proposes the following Corrective Action Plan to protect groundwater and to move this project toward “remediation termination” status:

- 1) Remove the upper (approximately) four feet of chloride impacted soils across the area affected by past operations of the BD O-23 junction box (approximately ~~5770~~84 ft with the southeast corner cut off to remain a safe distance away from a petroleum pipeline) and dispose of these in an NMOCD approved facility.
- 2) Install and properly seat a 20-mil plastic infiltration barrier at this depth encompassing the area impacted by the former junction box (as shown in Figure 6), and backfill with clean fill dirt with a chloride concentration below 500 mg/kg and a PID (field) reading below 100 ppm.
- 3) Prepare the surface soils over and surrounding the site and seed to a native vegetation mix.
- 4) Install a 4-inch diameter near-source “pumping well” and withdraw a volume of groundwater sufficient to remove the total estimated contributed chloride mass of ~~8,334~~8,893 lbs (Table 1). Removed

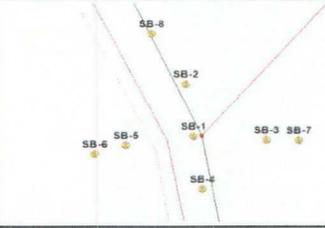
groundwater will be utilized for pipeline and well maintenance and possibly treated and used to promote vegetation. The Office of the State Engineer (OSE) will be pre-notified of this pumping activity.”

Page 2, paragraphs 3: text in blue lettering, below, will be added to the paragraph. Red lettering marked with a strike-through will be deleted.

“Upon the removal of the ~~8,334,893~~ 8,334,893 lbs of chloride and approximately ~~3,780,033~~ 3,780,033 barrels of groundwater we anticipate submitting to NMOCD a final remediation progress report and request for project termination.”

Thank you.

Katie Jones
Environmental Project Coordinator
RICE Operating Company

Logger:	Jordan Woodfin		
Driller:	Harrison & Cooper, Inc.		
Drilling Method:	Air rotary		
Start Date:	1/13/2011		
End Date:	1/13/2011	Project Name: BD O-23 vent Well ID: SB-8 Project Consultant: Texerra	
Comments: Located 37 ft north of the former junction box site.			Location: UL/O sec. 23 T21S R37E Lat: 32°27'36.309"N Long: 103°7'52.279"W County: LEA State: NM
TD = 40 ft DRAFTED BY: L.Weinheimer GW = 45 ft			

Depth (feet)	chloride field tests	LAB	PID	Description	Lithology	Well Construction			
5 ft	1,750		0.1	Tan very fine sand with small caliche fragments					
10 ft	1,765	Cl-704	0.0						
		GRO <10							
		DRO <10							
15 ft	1,693		0.0						
20 ft	1,010		0.0						
25 ft	1,367		0.0						
30 ft	845		0.0						
35 ft	453		0.0				Brownish red very fine silty sand		
40 ft	289	Cl-416	0.0						
		GRO <10							
		DRO <10							

bentonite seal

Soil Chloride Calculator
Estimated Mass of Contributed, Residual Chloride
from unsaturated zone soil and saturated zone groundwater

Site: **BD O-23 Vent**
 This estimate prepared by: L. Peter Galusky, Jr.
 Date: 1/31/2011

Model Inputs

Notes

length of affected area (ft)		70 measured/estimated
width of affected area (ft)		85 measured/estimated
depth to water table (ft)		40 measured
unsat zone affected depth (ft)		10 bottom 10 ft of unsat zone
sat zone affected thickness (ft)		10 prescribed by NMOCD
unsat zone avg Cl- conc of affected soil (ppm)		1,631 measured/estimated
unsat zone est. natural background Cl- conc (ppm)		141 lowest reading found
unsat zone mass density (lbs/cu yd)		3,000 estimated
Cl- conc of affected groundwater (ppm)		7,000 measured
Cl- conc of up-gradient groundwater (ppm)		4,400 measured
sat zone mass density (lbs/cu yd)		3,000 estimated
Cl- conc of recovery well (ppm)	MW-1	7,000 measured/estimated
avg daily pumping rate of recover well (gpm)		0.5 anticipated

Intermediate (calculated) Parameters

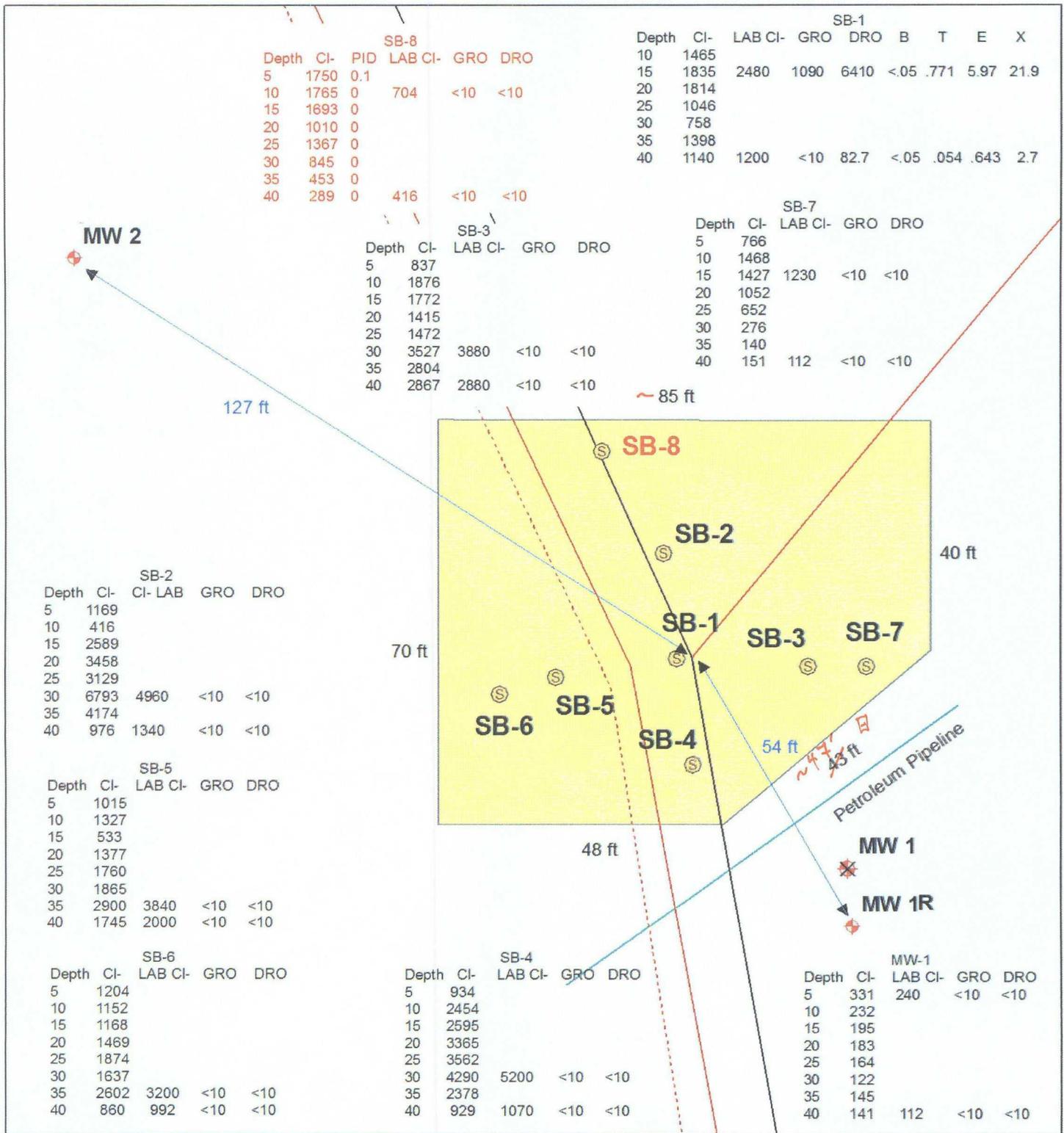
affected area (sq ft)	4,671 calculated
unsat zone Cl- conc attributed to source (ppm)	1,490 calculated
unsat zone volume of affected soil (cu yds)	1,730 calculated
unsat zone total mass of affected soils (lbs)	5,189,722 calculated
unsat zone mass of contributed residual soil chloride (lbs)	7,733 calculated
volume of affected groundwater (cu ft)	59,500 calculated
mass of affected groundwater (lbs)	446,250 calculated
mass of contributed Cl- in affected groundwater	1,160 calculated
avg daily pumping rate of recovery well (bbbl/day)	17.1 calculated
Cl- conc of recovery well (lbs/bbl)	2.2 calculated

Estimated Contributed Cl- Mass and Equivalent Pumping Volume & Time

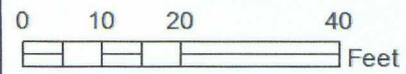
Max potential chlorides from unsaturated zone (soils)	7,733 calculated
Maximum potential chlorides from affected groundwater	<u>1,160</u> calculated
Total mass of contributed chlorides (lbs)	8,893 calculated
# bbbl to remove contributed Cl- from unsat zone	4,033 calculated
days pumping required to remove contributed Cl-	235 calculated

Note: It is assumed that only the lower 10 ft of soils in the affected unsaturated zone will potentially contribute chlorides to groundwater following the installation of an infiltration barrier. Therefore, in estimating the mass of contributed chlorides from the unsaturated zone only the lower ten feet were considered in the calculations.

Proposed liner



BD O-23 vent
 Legals: UL/O sec. 23
 T21S R37E
 Case #: 1R426-99



Drawing date: 10-22-10
 Drafted by: L. Weinheimer



January 20, 2011

Hack Conder
Rice Operating Company
112 W. Taylor
Hobbs, NM 88240

RE: BD O-23 VENT

Enclosed are the results of analyses for samples received by the laboratory on 01/14/11 8:07.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method SW-846 8260	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method TX 1005	Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene
Lab Director/Quality Manager

Analytical Results For:

Rice Operating Company
 Hack Conder
 112 W. Taylor
 Hobbs NM, 88240
 Fax To: (575) 397-1471

Received:	01/14/2011	Sampling Date:	01/13/2011
Reported:	01/20/2011	Sampling Type:	Soil
Project Name:	BD O-23 VENT	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: SB 8 @ 10 FT. (H100098-01)

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	704	16.0	01/17/2011	ND	432	108	400	3.77		
TPH 8015M		mg/kg		Analyzed By: AB						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	01/15/2011	ND	193	96.3	200	11.3		
DRO >C10-C28	<10.0	10.0	01/15/2011	ND	159	79.7	200	0.992		
<i>Surrogate: 1-Chlorooctane</i>		<i>102 %</i>	<i>70-130</i>							
<i>Surrogate: 1-Chlorooctadecane</i>		<i>109 %</i>	<i>70-130</i>							

Sample ID: SB 8 @ 40 FT. (H100098-02)

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	416	16.0	01/17/2011	ND	432	108	400	3.77		
TPH 8015M		mg/kg		Analyzed By: AB						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	01/15/2011	ND	193	96.3	200	11.3		
DRO >C10-C28	<10.0	10.0	01/15/2011	ND	159	79.7	200	0.992		
<i>Surrogate: 1-Chlorooctane</i>		<i>87.1 %</i>	<i>70-130</i>							
<i>Surrogate: 1-Chlorooctadecane</i>		<i>92.6 %</i>	<i>70-130</i>							

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- ** Samples not received at proper temperature of 6°C or below.
- *** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
Samples reported on an as received basis (wet) unless otherwise noted on report

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

CARDINAL LABORATORIES
 101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603
 (505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

Company Name: Rice Operating Company
Project Manager: Hack Conder
Address: 122 West Taylor
City: Hobbs **State:** NM **Zip:** 88240
Phone #: 575-393-9174 **Fax #:** 575-397-1471
Project #: **Project Owner:**
Project Name: BD O-23 Vent
Project Location: BD O-23 Vent
Sampler Name: Jordan Woodfin

Lab I.D.	Sample I.D.	FOR LAB USE ONLY		MATRIX		PRESERV.		SAMPLING		ANALYSIS REQUEST									
		(G)RAB OR (C)OMP	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	SLUDGE	OTHER	ACID/BASE	ICE/COOL	OTHER	DATE	TIME	Chlorides	TPH 8015 M	BTEX	Texas TPH	Complete Cations/Anions	TPH 8015 M Extended Thru C40
H100098-1	SB 8 @ 10ft	1	1	✓					✓		1/13/11	3:10	✓	✓					
2	SB 8 2.40ft	1	1	✓					✓		1/13/11	3:30	✓	✓					

Bill To

Company: _____
Attn: _____
Address: _____
City: _____
State: _____
Phone #: _____
Fax #: _____

Relinquished By: _____
Received By: _____
 Date: 1/13/11
 Time: 7:30

Relinquished By: Jordan Woodfin
Received By: _____
 Date: 1/14/11
 Time: 8:04

Delivered By: (Circle One)
 Sampler - UPS - Bus - Other:

Sample Condition: _____
 Checked By: _____
 Initials: JAW

Phone Result: Yes No
Fax Result: Yes No
ADD'l Phone #: _____
ADD'l Fax #: _____

REMARKS:
 email results
 Hcorder@riceswd.com; jwoodfin@riceswd.com;
 Lweinheimer@riceswd.com kjones@riceswd.com

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

NEED SAMPLES BACK, PLEASE

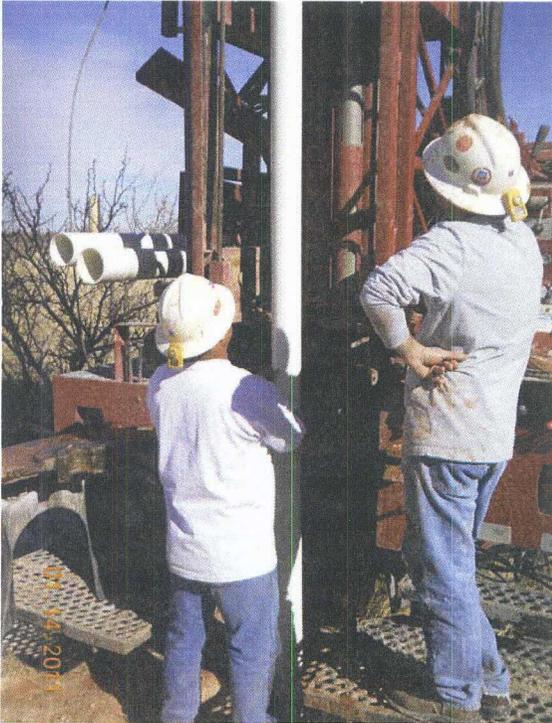
BD O-23 vent (1R426-99)
MW-1R Installation



drilling MW-1



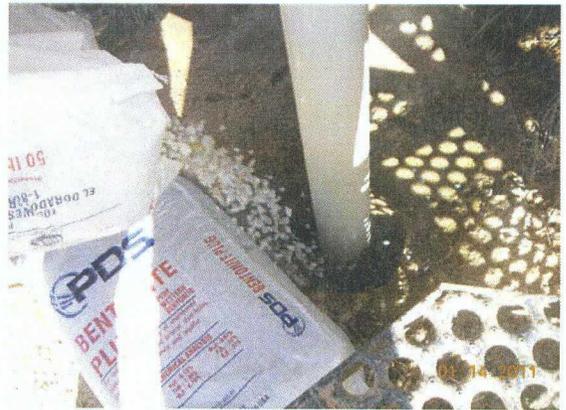
continued drilling with mud rotary



inserting the 4 inch casing



adding the sand pack



adding the bentonite seal



concreting in the riser



MW-1R complete

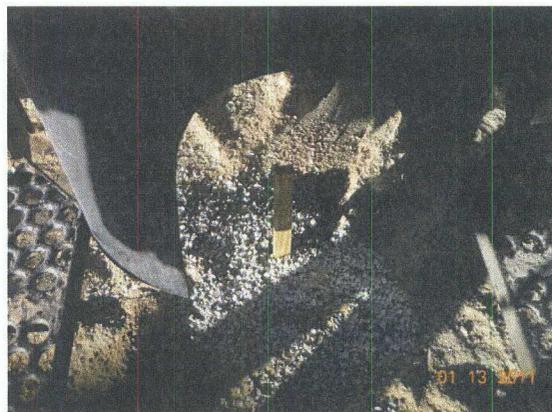
BD O-23 vent (1R426-99)
Drilling SB-8



drilling SB-8, facing north



plugging SB-8 in total with bentonite



SB-8 complete

Texerra

75 Wuthering Hts Drive Colorado Springs, CO 80921
Tel: 719-339-6791 E-mail: lpg@texerra.com

December 22nd, 2010

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

RECEIVED

JAN - 3 2011

RE: Corrective Action Plan (CAP)
Rice Operating Company – BD SWD System
BD O-23 Junction Box (Vent) UL O, Sect 23, Township 21S, Range 37E
NMOCD Case Number 1R426-99

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

Sent via Email and U.S. Certified Mail Return Receipt No. 7008 1140 0001 3068 8715

Mr. Hansen,

This report presents the results of additional groundwater sampling and analysis as specified in the Notification of Groundwater Impact for the BD O-23 Jct site (location given in Figure 1), submitted to NMOCD on September 13th of this year, and proposes a Corrective Action Plan (CAP) to restore the ground surface at the site and to protect groundwater quality.

Groundwater chloride concentrations were found on October 13th to measure 4,400 mg/l from (a more recently installed) up-gradient monitor well (MW-2) and to measure 7,000 mg/l from the original near-source/down-gradient monitor well (MW-1) on the same date. Monitor well locations are shown in Figure 2 and groundwater laboratory data are given in Figures 3 & 4. It is apparent that although the up-gradient groundwater quality is impaired before it moves across the location it has also been affected by the downward migration of residual soil chlorides from the site. This is supported by the elevated levels of residual soil chlorides measured across the site during a soils evaluation conducted on February 23rd and March 17th, 2010 (Figure 5). We estimate the residual mass of contributed chlorides to be approximately 7,340 lbs from the bottom 10 ft interval of the unsaturated zone and approximately 995 lbs in the affected groundwater beneath the site, based on the attached chloride mass calculations (Table 1).

Texerra recommends and proposes the following **Corrective Action Plan** to protect groundwater and to move this project toward “remediation termination” status:

- 1) Remove the upper (approximately) four feet of chloride impacted soils across the area affected by past operations of the BD O-23 junction box (approximately 57x84 ft with the southeast corner cut off to remain a safe distance away from a petroleum pipeline) and dispose of these in an NMOCD approved facility.
- 2) Install and properly seat a 20-mil plastic infiltration barrier at this depth encompassing the area impacted by the former junction box (as shown in Figure 6), and backfill with clean fill dirt with a chloride concentration below 500 mg/kg and a PID (field) reading below 100 ppm.
- 3) Prepare the surface soils over and surrounding the site and seed to a native vegetation mix.

BD O-23 Jct Box Corrective Action Plan

- 4) Install a 4-inch diameter near-source "pumping well" and withdraw a volume of groundwater sufficient to remove the total estimated contributed chloride mass of 8,334 lbs (Table 1). Removed groundwater will be utilized for pipeline and well maintenance and possibly treated and used to promote vegetation. The Office of the State Engineer (OSE) will be pre-notified of this pumping activity.

The re-establishment of natural vegetation will remove most precipitation through evapotranspiration and the installation of the synthetic liner installed below the root zone will virtually stop the downward migration of water that the plants are unable to capture during wet periods. The net effect of this "evaporation/infiltration barrier" will be to first diminish and then to eventually stop the downward migration of residual soil chlorides into the groundwater. Taken together, these measures will protect groundwater quality beneath and down-gradient from the subject location.

We will sample groundwater on a quarterly basis from the up-gradient monitor well and the (to be constructed) near-source pumping well, and analyze this in the laboratory for chlorides, sulfate, TDS and BTEX. We will additionally measure the volume of groundwater removed from the pumping well over time and monitor chlorides in this water using field titration methods on a more frequent basis.

Upon the removal of the 8,334 lbs of chloride and approximately 3,780 barrels of groundwater we anticipate submitting to NMOCD a final remediation progress report and request for project termination.

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

Please do not hesitate to contact either myself or Rice Operating Company if you have any questions or need additional information.

Sincerely,



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

Attachments: Figures and Tables
Copy: Rice Operating Company

BD O-23 Jct Box Corrective Action Plan



Figure 1 – BD O-23 Jct (vent) location.

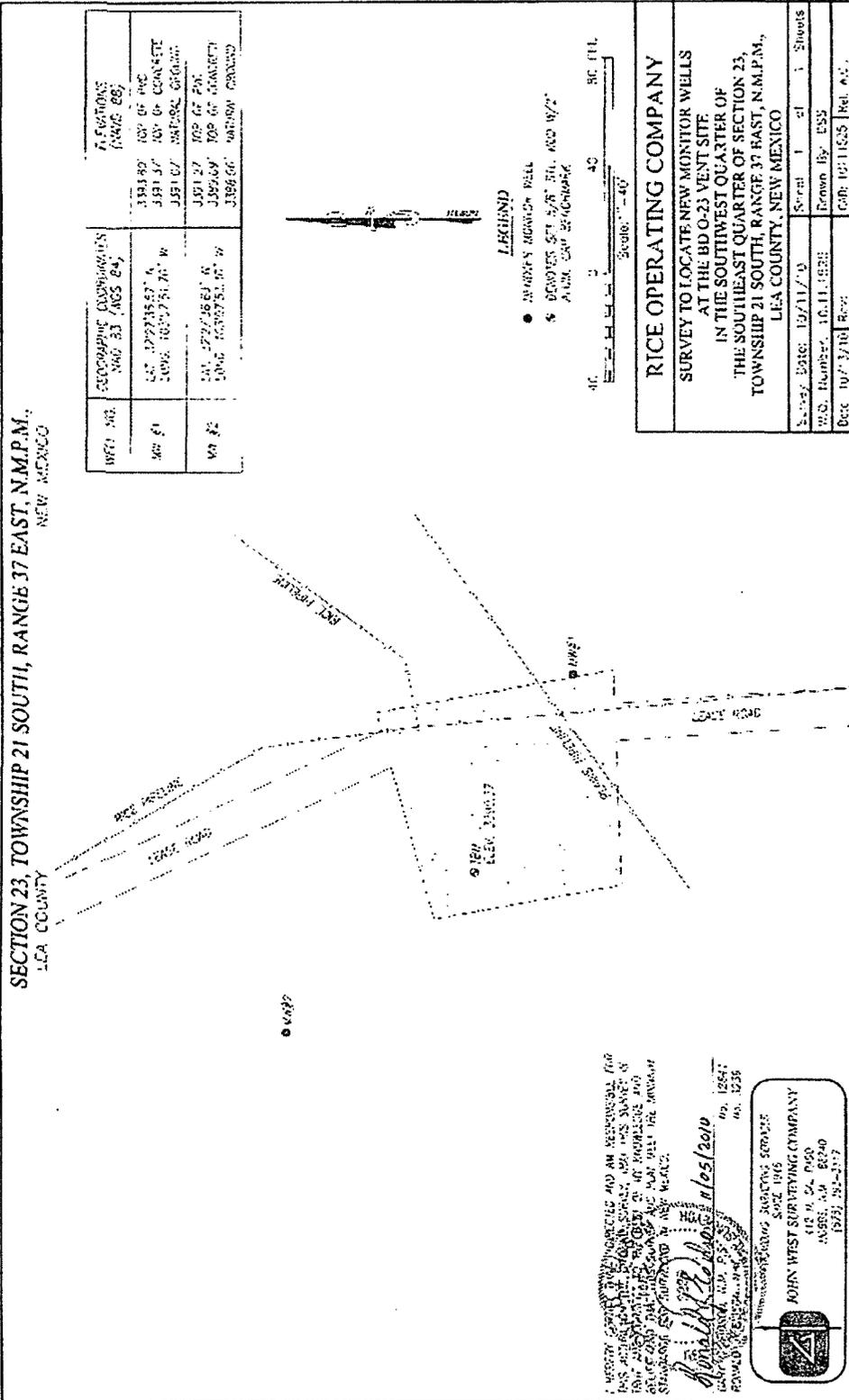


Figure 2 – BD O-23 Vent surveyed monitor well locations.

Soil bore information

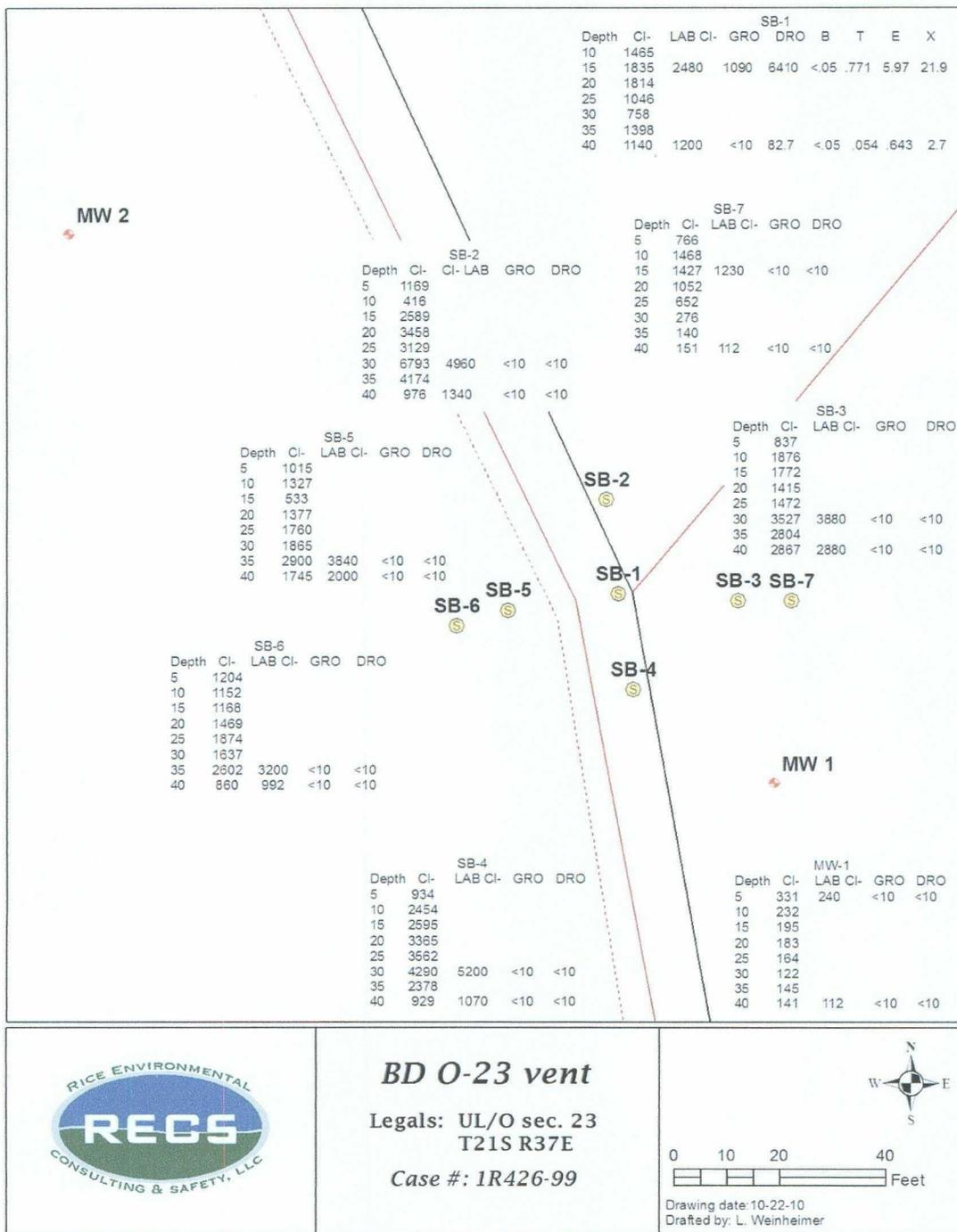


Figure 5 – Soil chloride concentrations as measured in the field (and confirmed in the laboratory) on February 23rd and March 17th, 2010.

BD O-23 Jct Box Corrective Action Plan

Table 1 – BD O-23 Vent residual chloride mass calculations.

Soil Chloride Calculator

Estimated Mass of Contributed, Residual Chloride

from unsaturated zone soil and saturated zone groundwater

Site: **BD O-23 Vent**
 This estimate prepared by: L. Peter Galusky, Jr.
 Date: 12/14/2010

Model Inputs

Notes

length of affected area (ft)	60 measured/estimated
width of affected area (ft)	85 measured/estimated
depth to water table (ft)	40 measured
unsat zone affected depth (ft)	10 bottom 10 ft of unsat zone
sat zone affected thickness (ft)	10 prescribed by NMOCD
unsat zone avg Cl- conc of affected soil (ppm)	1,791 measured/estimated
unsat zone est. natural background Cl- conc (ppm)	141 lowest reading found
unsat zone mass density (lbs/cu yd)	3,000 estimated
Cl- conc of affected groundwater (ppm)	7,000 measured
Cl- conc of up-gradient groundwater (ppm)	4,400 measured
sat zone mass density (lbs/cu yd)	3,000 estimated
Cl- conc of recovery well (ppm)	MW-1 7,000 measured/estimated
avg daily pumping rate of recover well (gpm)	0.5 anticipated

Intermediate (calculated) Parameters

affected area (sq ft)	4,004 calculated
unsat zone Cl- conc attributed to source (ppm)	1,650 calculated
unsat zone volume of affected soil (cu yds)	1,483 calculated
unsat zone total mass of affected soils (lbs)	4,448,333 calculated
unsat zone mass of contributed residual soil chloride (lbs)	7,340 calculated
volume of affected groundwater (cu ft)	51,000 calculated
mass of affected groundwater (lbs)	382,500 calculated
mass of contributed Cl- in affected groundwater	995 calculated
avg daily pumping rate of recovery well (bbls/day)	17.1 calculated
Cl- conc of recovery well (lbs/bbl)	2.2 calculated

Estimated Contributed Cl- Mass and Equivalent Pumping Volume & Time

Max potential chlorides from unsaturated zone (soils)	7,340 calculated
Maximum potential chlorides from affected groundwater	995 calculated
Total mass of contributed chlorides (lbs)	8,334 calculated
# bbls to remove contributed Cl- from unsat zone	3,780 calculated
days pumping required to remove contributed Cl-	220 calculated

Note: It is assumed that only the lower 10 ft of soils in the affected unsaturated zone will potentially contribute chlorides to groundwater following the installation of an infiltration barrier. Therefore, in estimating the mass of contributed chlorides from the unsaturated zone only the lower ten feet were considered in the calculations.

Proposed liner

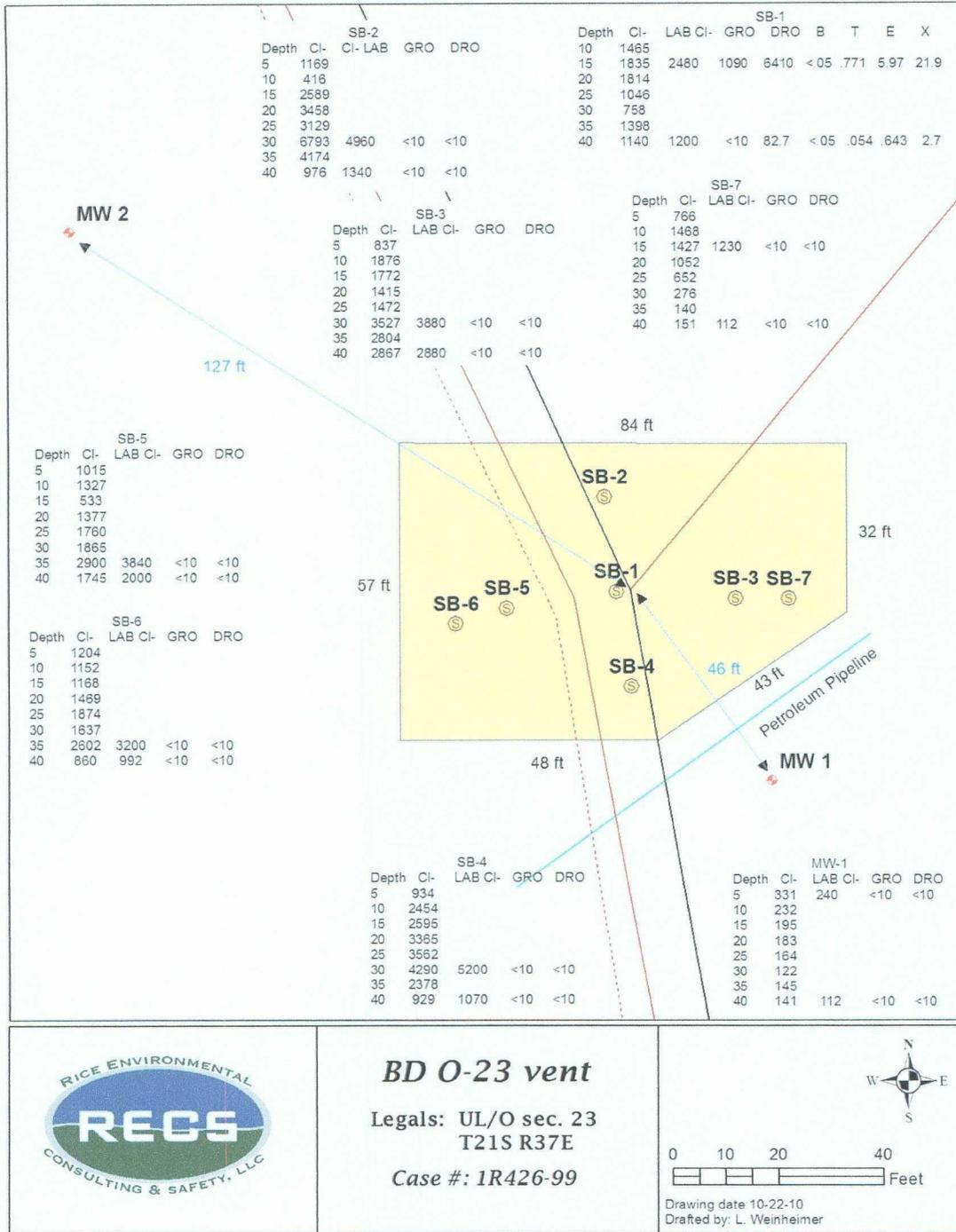


Figure 6 – Schematic diagram of proposed sub-surface soil liner (yellow shaded area) superimposed over soil boring data map (Figure 5).