

1R - 499

# WORKPLANS

Date:

1-7-11

## Hansen, Edward J., EMNRD

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Thursday, February 17, 2011 5:10 PM  
**To:** 'Katie Jones'  
**Cc:** Hack Conder; lpg@texerra.com  
**Subject:** RE: Name Change Request BD Campbell Hedrick Hardy leak - BD P-19 EOL leak (1R-499)

Dear Ms. Jones:

The New Mexico Oil Conservation Division has reviewed your request for a site name change. OCD hereby grants your request:

The site will be named Rice BD P-19 EOL Leak site with the OCD case #1R-499.

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

Edward J. Hansen  
Hydrologist  
Environmental Bureau

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**From:** Katie Jones [<mailto:kjones@riceswd.com>]  
**Sent:** Thursday, February 17, 2011 4:01 PM  
**To:** Hansen, Edward J., EMNRD  
**Cc:** Hack Conder; lpg@texerra.com  
**Subject:** Name Change Request BD Campbell Hedrick Hardy leak - BD P-19 EOL leak

Mr. Hansen,

ROC requests a name change of the BD Campbell Hedrick Hardy leak site to BD P-19 EOL leak to reflect the geographic location of the site. This site is located in Unit P, Section 19, T21S, R37E. With NMOCD approval, all future correspondence will be addressed as BD P-19 EOL leak. Please let me or Hack Conder know if you have any questions or require any additional information.

Thank you.

Katie Jones  
Environmental Project Coordinator  
RICE *Operating Company*

1R-499

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

RECEIVED OGD

**Texerra**

75 Wuthering Hts Drive Colorado Springs, CO 80921-29  
Tel: 719-339-6791 E-mail: lpg@texerra.com

January 7th, 2011  
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: **Corrective Action Plan**  
Rice Operating Company – BD SWD System  
BD Campbell Hedrick Hardy Jct Box Leak  
UL P SEC. 19 T-21-S R-37-E

Sent via E-mail and U.S. Mail Certified Return Receipt No. 7008 1830 0004 2694 4316

2011 JAN 11 P 2  
RECEIVED OGD

Mr. Hansen:

This letter is to summarize the present conditions at Rice Operating Company's BD Campbell Hedrick Hardy Junction Box (subsequently referred to as the BD CHH site) and to present a Corrective Action Plan to remediate the effects of a spill of produced water that was discovered on July 17<sup>th</sup>, 2004.

The BD CHH site is located approximately 3 miles west-northwest of the City of Eunice (Figure 1). Approximately 675 bbls of produced water were estimated to have been released, pooling in down-gradient low lying areas before being removed by a vac-truck (Figure 2). The results of a field evaluation of residual soil chlorides are summarized in Figure 3, and are indicative of moderate to low near-surface impacts. As the depth to groundwater is greater than 100 ft the potential for groundwater impact from this relatively small spill is exceedingly small. We therefore propose the following work elements as a Corrective Action Plan to restore the surface and to obtain regulatory termination:

1. The upper six to twelve inches of soil from the affected areas outside of the caliche lease road (Figures 4a & 4b) will be removed and disposed of in an approved landfill.
2. Clean soil material will be hauled in and the site graded to natural contours.
3. The site (outside of the caliche lease road) will be seeded to a native vegetation mix.
4. Photographs will be taken of the work as it is being done and upon completion, a brief report will be submitted requesting regulatory termination.

**BD Campbell Hedrick Hardy Jct Box**

ROC is the service provider (agent) for the BD 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.

We submit this Corrective Action Plan for your review and approval.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to be 'L. Peter Galusky, Jr.', written in a cursive style.

L. Peter Galusky, Jr. Ph.D.

Copy: Rice Operating Company

# BD Campbell Hedrick Hardy Jct Box



Figure 1 – BD Campbell Hedrick Hardy Jct Box location.

# BD Campbell Hedrick Hardy Jet Box

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1230 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised October 10, 2003  
Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

## Release Notification and Corrective Action

### OPERATOR

Initial Report  Final Report

Name of Company: Rice Operating	Contact: Tony Grieco
Address: 122 W. Taylor St., Hobbs, NM 88240	Telephone No.: (505) 393-9174
Facility Name: BD	Facility Type: Salt Water Gathering System

Surface Owner: Millard Deck	Mineral Owner: BLM	Lease No.
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### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
P	19	21S	37E					Lea

Latitude: 32°27.477N Longitude: 103°11.735W

### NATURE OF RELEASE

Type of Release: Produced water	Volume of Release: 685 bbls	Volume Recovered: 685 bbls
Source of Release: A four-inch PVC 45 degree 'L' failed	Date and Hour of Occurrence: 7/17/04 7:30 AM	Date and Hour of Discovery: 7/17/07 7:30 AM
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*: A four inch PVC 45 degree 'L' failed. A new 'L' was installed as a permanent repair.

Describe Area Affected and Cleanup Action Taken.\*: A vacuum truck was dispatched which recovered and properly disposed 685 bbls of fluid. A total of 30 yds of impacted soil were removed to Sundance disposal facility, and 36 yds of clean material were imported.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCID rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCID marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCID acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

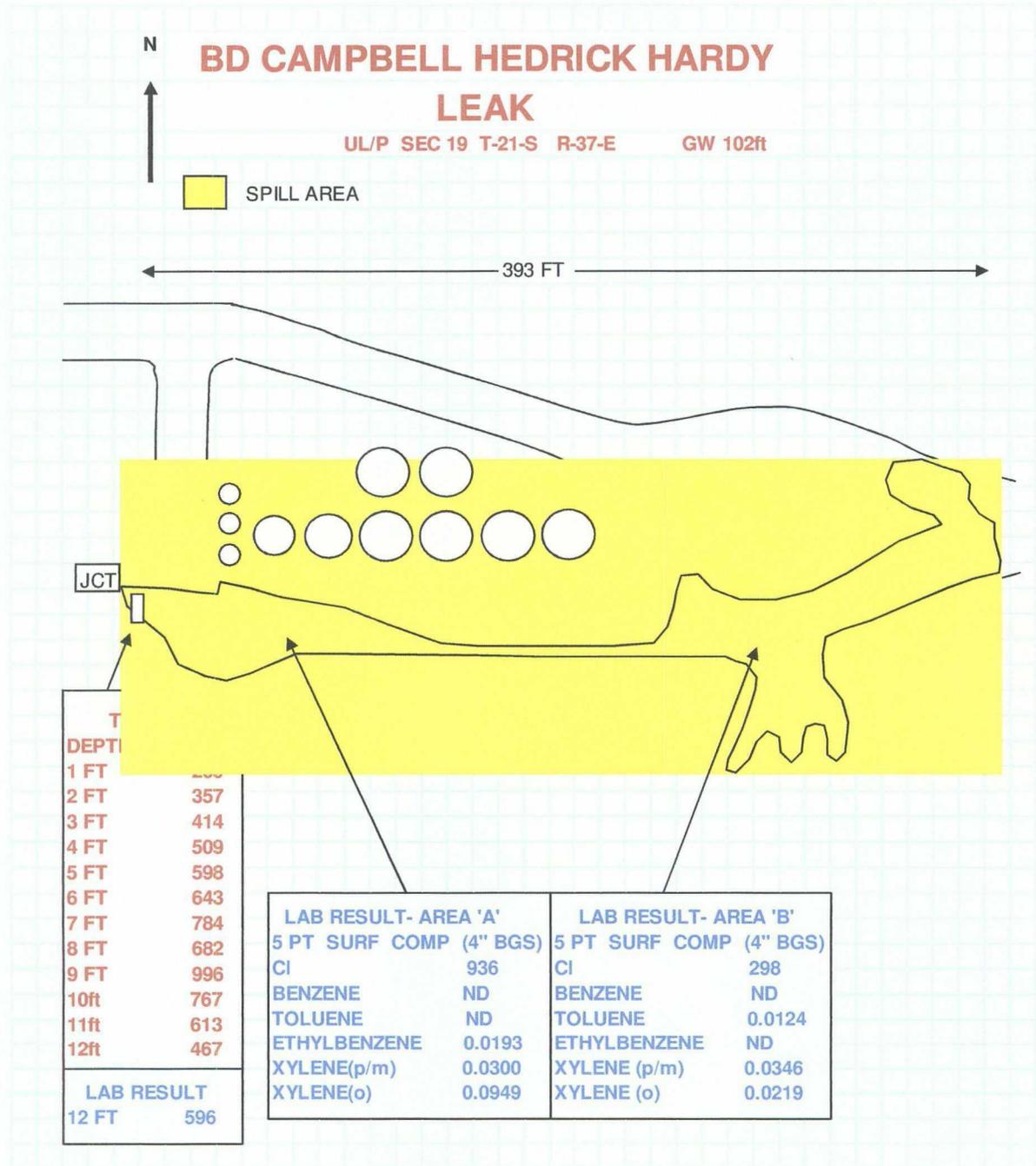
### OIL CONSERVATION DIVISION

Signature:	Approved by District Supervisor:	
Printed Name: Tony Grieco	Approval Date:	Expiration Date:
Title: Environmental Tech	Conditions of Approval:	
E-mail Address: tgrieco@riceswd.com	Attached <input type="checkbox"/>	
Date: 6/27/08	Phone: (505) 393-9174	

\* Attach Additional Sheets If Necessary

**Figure 2** – CH 141 Form for a produced water release at the BD Campbell Hedrick Hardy site.

**BD Campbell Hedrick Hardy Jct Box**



**Figure 3 – BD Campbell Hedrick Hardy Junction Box location showing spill areas and the results of field evaluation of residual soil chlorides.**

## BD Campbell Hedrick Hardy Jct Box



**Figure 4a & 4b** – BD Campbell Hedrick Hardy Junction Box location view looking northeast (Figure 4a, above) and east-southeast (Figure 4b, below) show areas impacted from produced water release. It is these open, un-vegetated areas that we propose to restore in the Corrective Action Plan.