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GENERAL CORRESPONDENCE

YEAR(S):

2004

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Infrastructure, buildings, environment, communications

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Wayne Price
New Mexico Oil Conservation Division
1220 So. Saint Francis Drive
Santa Fe, New Mexico 87505
Sent Certified Mail

Subject:
Investigation Workplan
Rice Operating Company Blinebry-Drinkard K-27 North Junction Box Site
T21S, R37E, Section 27, Unit K Eunice, Lea County, New Mexico

Date:
1 April 2004

Contact:
Sharon Hall

Phone:
432 687-5400

Email:
shall@arcadis-us.com

Dear Mr. Price,

On behalf of Rice Operating Company (ROC), ARCADIS G&M respectfully submits this investigation workplan for the above-referenced site. A Junction Box Disclosure report was completed for this site on July 25, 2003 and submitted to the New Mexico Oil Conservation Division (NMOCD) per the ROC Junction Box Upgrade Workplan.

Site History and Background

The junction box has been removed from the subject site. Following removal of the junction box, soil was excavated from the site. The excavation measured 30 feet long by 30 feet wide and 12 feet deep. During excavation activities, a 24-inch corroded steel gas line was encountered to the north and east of the junction box excavation. A subsurface drip collection vessel was found under the gas line northwest of the junction box. The drip collection vessel was removed by the gas transportation company soon after it was encountered.

Soil from the sidewalls and bottom of the excavation and the backfill material was sampled and analyzed for benzene, toluene, ethlybenzene, xylenes, (BTEX) GRO, DRO and chlorides. Additionally, soil samples were field tested for chlorides and total petroleum hydrocarbons (TPH). Laboratory and field analytical results are shown in Tables 1 and 2. The sidewall sample consisted of a 4-point composite sample, and the bottom sample consisted of a 5-point composite sample.

Based on the results of the soil sampling analytical results, elevated chloride and hydrocarbon concentrations are present at the subject site. Field TPH results indicate that the highest concentration of TPH was detected in the sample collected from beneath the drip collection vessel. The excavation was backfilled with excavated soil to a depth 4 feet below ground surface, and a 20-mil poly liner was installed above

the backfilled, excavated soil. Four feet of clean imported soil was backfilled above the liner and the site was graded and seeded with native vegetation.

Proposed Investigation Workplan

A one-half mile water well inventory will be performed. The water well inventory will include a review of water well records listed on the New Mexico State Engineer Office and United States Geological Survey (USGS) websites and windmills indicated on applicable USGS topographic maps.

One soil boring will be installed at the subject site at the former junction box location. Soil samples will be collected at regular intervals no greater than five feet, screened in the field using a photo ionization detector (PID) and field tested for chlorides. Soil lithology and the presence of any observed staining or odor will be recorded. One sample, the sample collected at total depth of the boring will be submitted to a laboratory for laboratory analysis as confirmation of the field sampling.

If impacts to soil are identified in soil samples collected from the interval at which groundwater is encountered, the soil boring will be converted to a monitoring well. The monitor well will be constructed, developed and sampled in accordance with Environmental Protection Agency and NMOCD standards. A groundwater sample will be collected and submitted for laboratory analysis for chlorides, BTEX and general chemistry.

A groundwater sample will be collected and submitted for laboratory analysis for chlorides, BTEX and general chemistry.

If analytical results indicate that chloride and/or BTEX concentrations exceed New Mexico Water Quality Control Commission standards, additional monitoring wells may be installed as warranted by the results of the investigation.

A report that details the investigation activities and results will be submitted to the OCD. The report will include recommendations for further action if necessary or for closure of the site.

Very Truly Yours,

ARCADIS G&M, Inc.

Sharon E. Hall

Sharon E. Hall
Site Evaluation Department Manager

Copies:
Carolyn Haynes- Rice Operating Company

Attachment:

Tables 1 and 2

TABLE 1

K-27-NORTH

LABORATORY ANALYTICAL RESULTS

Sample Location	Benzene mg/kg	Toluene mg/kg	Ethylbenzene mg/kg	Total Xylenes mg/kg	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SIDEWALLS	<0.025	<0.025	0.181	0.748	139	1440	1770
BOTTOM	<0.025	<0.025	0.277	0.867	336	2600	1490
BACKFILL	<0.025	<0.025	<0.025	<0.025	66.5	2940	709

TABLE 2

FIELD TESTS

CHLORIDE

Location	Depth (ft)	ppm
Vertical	4	200
Vertical	12	800
4 wall comp.	n/a	1700
bottom comp.	12	1450
backfill	n/a	1300

TPH

Vertical	12	23980
15' North (under drip tank)	6	47800