

AP - 49

**STAGE 1 & 2  
WORKPLANS**

**DATE:**

Aug. 2, 2001



emergency overflow pits. The enclosed C-103 form addresses this intention and defines the site-specific assessment for OCD guidelines. Supporting documentation is also enclosed.

A temporary tank system will be installed at this site. The below-grade redwood tank will be cleaned, dismantled and removed. The tank materials will be properly disposed at an approved oilfield waste facility and documentation will be included in the Final Closure Report.

ROC will schedule all major events with a 48-hour advance notice to the NMOCD. The Final Closure Report will follow at the end of the project.

Thank you for your consideration of this below grade redwood tank closure plan.

RICE OPERATING COMPANY



Carolyn Doran Haynes  
Operations Engineer

Enclosures  
cc: LBG, DA, file

Mr. Chris Williams  
NMOCD, District I Office  
1625 N. French Drive  
Hobbs, NM 88240

George Willis  
Joyce Willis  
P. O. Box 307  
Jal, NM 88252

Submit 3 Copies To Appropriate District Office  
 District I  
 1625 N. French Dr., Hobbs, NM 87240  
 District II  
 811 South First, Artesia, NM 87210  
 District III  
 1000 Rio Brazos Rd., Aztec, NM 87410  
 District IV  
 2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
 Energy, Minerals and Natural Resources

Form C-103  
 Revised March 25, 1999

OIL CONSERVATION DIVISION  
 2040 South Pacheco  
 Santa Fe, NM 87505

WELL API NO. 30-025-21325
5. Indicate Type of Lease STATE <input type="checkbox"/> FEE <input checked="" type="checkbox"/>
6. State Oil & Gas Lease No.
7. Lease Name or Unit Agreement Name:  JUSTIS
8. Well No.  H-2
9. Pool name or Wildcat SAN ANDRES
10. Elevation (Show whether DR, RKB, RT, GR, etc.) 3025' GL; 3033' KB

**SUNDRY NOTICES AND REPORTS ON WELLS**  
 (DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH PROPOSALS.)

1. Type of Well:  
 Oil Well  Gas Well  Other SWD Well

2. Name of Operator  
 RICE OPERATING COMPANY

3. Address of Operator  
 122 W. TAYLOR, HOBBS, NM 88240

4. Well Location  
 Unit Letter H : 1980 feet from the NORTH line and 660 feet from the EAST line  
 Section 2 Township 26S Range 37E NMPM LEA County

11. Check Appropriate Box to Indicate Nature of Notice, Report or Other Data

<b>NOTICE OF INTENTION TO:</b>	<b>SUBSEQUENT REPORT OF:</b>
PERFORM REMEDIAL WORK <input type="checkbox"/>	REMEDIAL WORK <input type="checkbox"/>
PLUG AND ABANDON <input type="checkbox"/>	ALTERING CASING <input type="checkbox"/>
TEMPORARILY ABANDON <input type="checkbox"/>	COMMENCE DRILLING OPNS. <input type="checkbox"/>
CHANGE PLANS <input type="checkbox"/>	PLUG AND ABANDONMENT <input type="checkbox"/>
PULL OR ALTER CASING <input type="checkbox"/>	CASING TEST / CEMENT JOB <input type="checkbox"/>
MULTIPLE COMPLETION <input type="checkbox"/>	OTHER: <input type="checkbox"/>
OTHER: Close Redwoods and overflow pit <input checked="" type="checkbox"/>	

12. Describe proposed or completed operations. (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work). SEE RULE 1103. For Multiple Completions: Attach wellbore diagram of proposed completion or recompilation.

Proposed work according to NMOCD approved generic closure plan for below-grade redwood tanks: Delineate site for contamination, install temporary tank system, remove redwood tanks and clean-up location pursuant to NMOCD guidelines. Replace redwood tanks with fiberglass tanks within secondary containment. Work to begin in September, 2001. All major events including boring, sampling events, will be coordinated to allow 48 hrs notice to NMOCD.

Information from the NMSEO groundwater database estimated depth to ground water at <100' and indicate closest water well to be in Unit Letter "L" of Sec. 2, T26S, R37E which is more than 1000' from the facility at SWD Well H-2. Topographic maps show no indication of surface water bodies within 1000' of the H-2 facility. A site review indicated no water sources within 1000' of H-2.

Depth to GroundWater: <100' = 0; Water source within 1000' = 0; No surface water body within 1000' = 0  
 Site Assessment = 0

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE Carolyn Doran Haynes TITLE OPERATIONS ENGINEER DATE 8-2-01

Type or print name CAROLYN DORAN HAYNES Telephone No. 505-393-9174

(This space for State use)

APPROVED BY \_\_\_\_\_ TITLE \_\_\_\_\_ DATE \_\_\_\_\_

Conditions of approval, if any:

# **RICE** *Operating Company*

122 West Taylor · Hobbs, NM 88240

Phone: (505) 393-9174 · Fax: (505) 397-1471

## **SITE PROFILE**

### **Location**

Justis SWD Facility H-2 is situated approximately 4 miles east and 4 miles south of Jal, NM. Maps of the area are included in this report.

### **Site History**

The site is used as a flow-through collection and injection facility for salt-water disposal of the Justis Salt Water Disposal System. The facility used one 28' diameter below-grade redwood tank as a flow-through collection vessel. There is an emergency overflow pit at this site. The SWD Well H-2 is located at this site. A map of the facility is included in this report.

The below-grade redwood tank will be removed. The new fiberglass tank facility will be installed after the site vadose zone has been adequately remediated. A 30-mil polyethylene liner will provide secondary containment for the two 21.5' diameter flow-through fiberglass tanks. A 21.5' diameter fiberglass overflow tank will also be set to provide for extra containment. This upgrade is scheduled to start October 2001 and be completed by February 2002.

### **Land Use**

This facility is on Fee Land. The 2.5-acre disposal facility site lease agreement with landowner George Willis has been in effect since 1989. The primary use of this land is oil and gas production. The topography is unremarkable.

### **Distance to Surface and Ground Water**

There are no domestic water wells within 200' of the facility. There are no windmills, water pumps or surface waters within 1000' of the facility. The vertical distance to groundwater at this site is estimated to be <100' BGS.

## SALT WATER DISPOSAL LEASE

## JUSTIS SALT WATER DISPOSAL SYSTEM WELLS N-26 AND H-2

THIS AGREEMENT, made and entered into this 4th day of December,  
19 98, between George Willis, husband and Joyce Marie Willis, wife, hereinafter called  
Lessors, and Rice Operating Company, hereinafter called Lessee,

## WITNESSETH:

That Lessors do hereby demise, lease and let unto Lessee, its successors or assign, the  
following tracts of land located in Lea County, New Mexico:

Two and one half (2 1/2) acres in the form of a square around the Justis Salt Water  
Disposal Well N-26 located in the SE/4 SW/4 of Section 26, Township 25 South, Range 37  
East, N.M.P.M.,

and

Two and one half (2 1/2) acres in the form of a square around the existing Justis Salt Water  
Disposal Well H-2 located in the SE/4 NE/4 of Section 2, Township 26 South, Range 37  
East, N.M.P.M.,

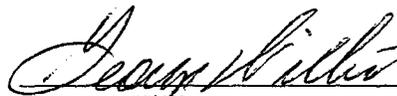
together with the right of ingress and egress to and from the leased premises, for the uses and  
terms hereinafter set forth:

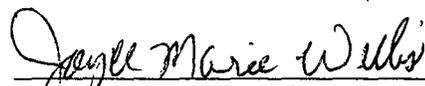
1. Lessee shall have the exclusive right to use each leased premise and a disposal well  
located thereon, in connection with the injection and disposal of oilfield brine and  
other waste water and their injection into the substrata of land; and for the digging of  
pits; for the laying of salt water gathering line; for the erection of tanks and  
receptacles necessary in receiving, treating and disposing of said brine and waste  
water, and for the erection of structures, appliances, engines and machinery necessary  
in connection with the operation of the well as a salt water disposal well on each  
lease.

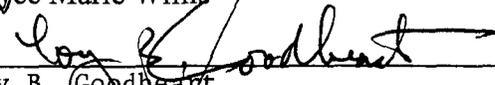
2. This lease shall be for a period of ten (10) years from this date and shall terminate on the thirty-first day of July, 2008 or at such time as lessee exercises the option outlined in paragraph five (5). Lessee shall have the option to renew the lease subsequent to termination date. Lessee agrees to pay the sum of \$0.02375 per barrel (42 gallons) for water disposed upon the leases. Said payment to be made monthly and tendered by draft or check of Lessee, on or about the 20th day of the month following the month in which the water was disposed. Payments will be delivered by U. S. Mail. A check for two thirds (2/3) of said payment will be addressed to Lessors at Box 307, Jal, New Mexico 88252. A check for one third (1/3) of said payment will be addressed to Martin Nathaniel Willis at Drawer QQ, Jal, New Mexico 88252. Monthly payments are to be adjusted quarterly based proportionately upon the most recent posted price for New Mexico Sour Crude Oil as published by Phillips 66 Company, Bartlesville, Oklahoma, its successors or assigns, with the beginning index price of \$0.02375 per barrel of water at posted price for crude oil of \$20.00 per barrel, said adjustments shall be made in even 10% increments. However, the minimum water disposal fee shall be \$0.02375 per barrel or \$750.00 per well per month whichever is greater. Payments for water disposal will be made in accordance with Operator's Monthly Report Form C-115 which is submitted monthly to the Oil Conservation Division of Energy, Minerals and Natural Resources Department of the State of New Mexico or any subsequent Government forms as required.
3. Lessee shall have the right to use the leased premises and the disposal wells for the injection of oilfield brine and waste water into the substrata of said lands, whether produced on lands operated for oil and gas by Lessee or those so operated by others.

4. Lessee agrees to pay Lessors for damages to grasslands or growing crops or livestock arising out of or incident to the exercise of the use of this lease.
5. Lessee shall have the right, during the term of this lease or within six (6) months thereafter, to remove from the leased premises all materials, equipment and personal property placed there on by Lessee.
6. Lessee, in operating the disposal wells, shall not inject the brine or other waste water into fresh water bearing sands and shall conduct its operations in accordance with rules and regulations of the Oil Conservation Division, or other proper authority.
7. Counterparts of this lease or ratification's thereof may be executed by one or more parties, with the same force and effect as if all parties had joined in the execution of the same instrument.
8. The terms of this lease shall extend to and be binding on the parties hereto, their heirs, successors or assigns.

EXECUTED THIS 1 day of December, 19 98.

  
George Willis

  
Joyce Marie Willis

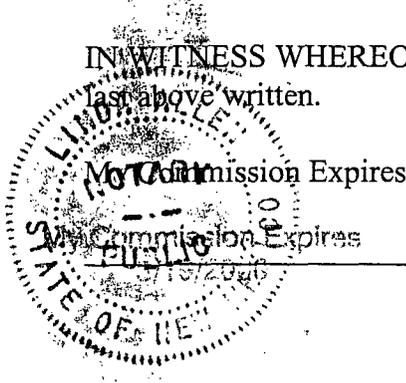
  
Loy B. Goodheart

Page 3 of 4

STATE OF NEW MEXICO )  
 )SS  
COUNTY OF: Lea )

BEFORE ME, Notary Public in and for said county and state, on this 15<sup>th</sup> day of DECEMBER, 1998, personally appeared George Willis and Joyce Marie Willis, to me known to be the identical persons who executed the within and foregoing instrument and acknowledged to me that they executed the same as their free and voluntary act and deed for the uses and purposes therein set forth.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal this day and year last above written.



Linda Allen  
Notary Public



STATE OF TEXAS )  
 )SS  
COUNTY OF: Midland )

BEFORE ME, Notary Public in and for said county and state, on this 4<sup>th</sup> day of December, 1998, personally appeared Loy B. Goodheart, President of Rice Operating Company, a Delaware corporation, on behalf of the corporation, and acknowledged to me that he executed the foregoing instrument for the uses and purposes therein set forth.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal this day and year last above written.

My Commission Expires

November 15, 1999

Maria Katherina Schwartz  
Notary Public

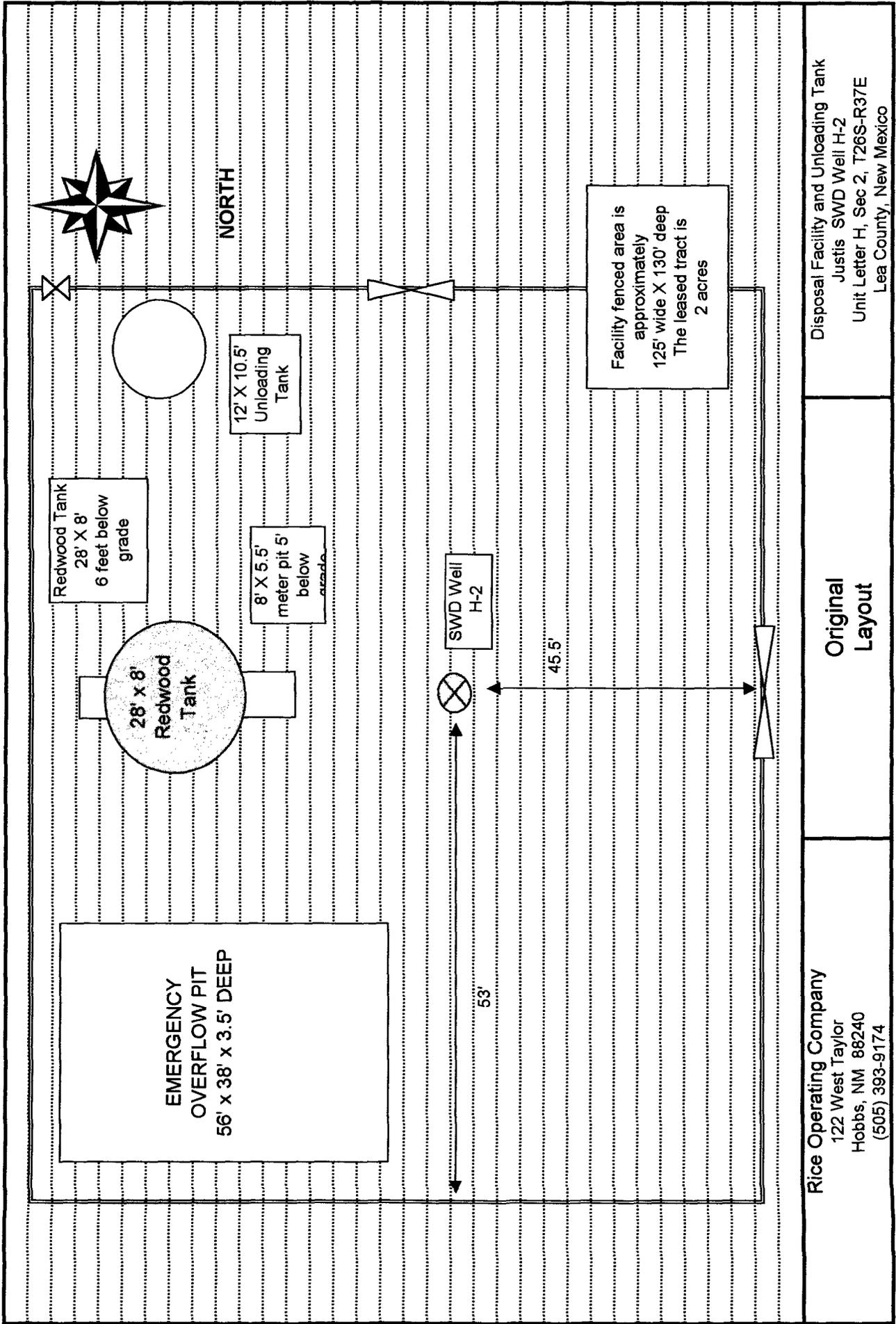


STATE OF NEW MEXICO  
COUNTY OF LEA  
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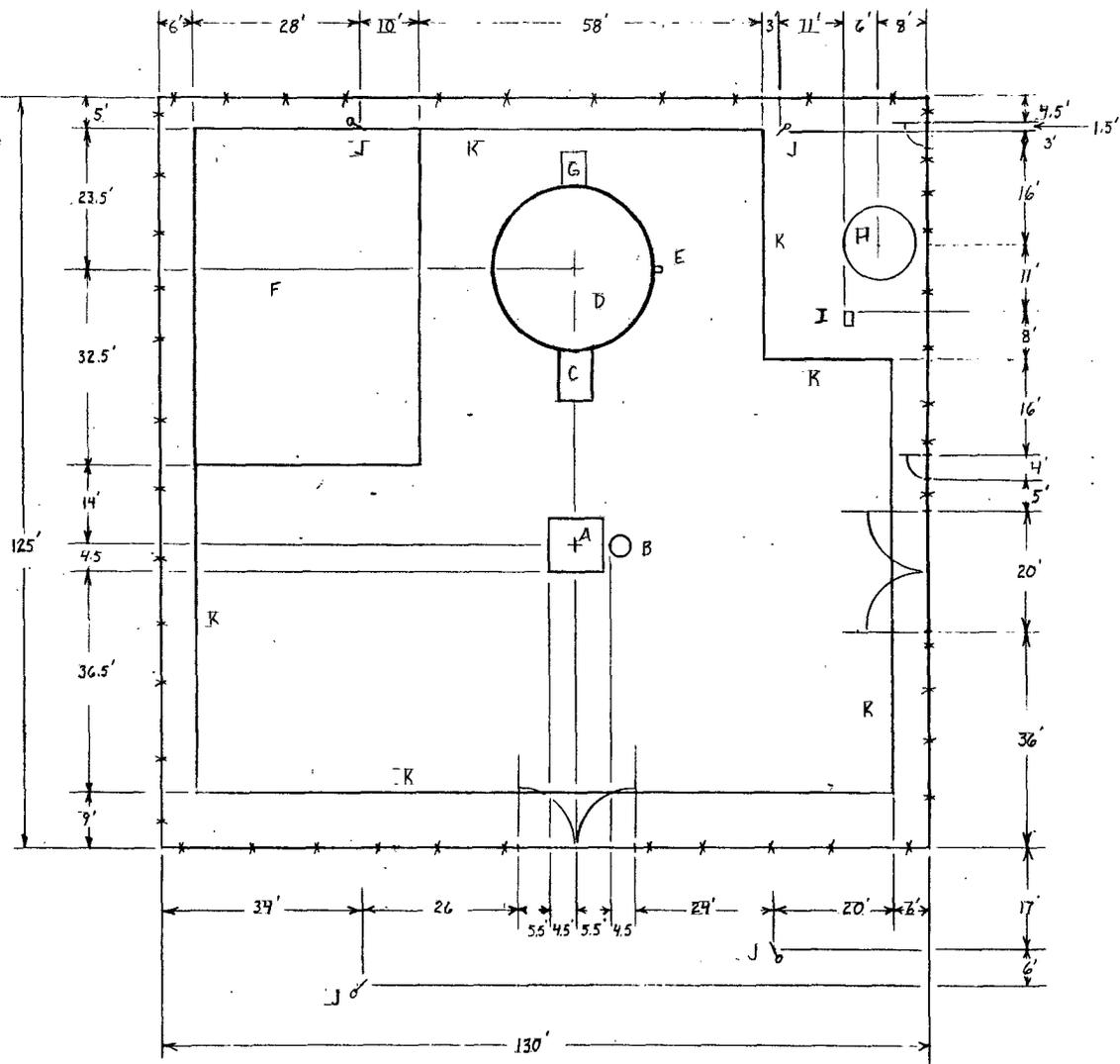
DEC 11 1998  
at 4:50 o'clock 1 M  
and recorded in Book 923  
Page 197  
Pat Chappelle, Lea County Clerk  
By [Signature] Deputy



Rice Operating Company  
 122 West Taylor  
 Hobbs, NM 88240  
 (505) 393-9174

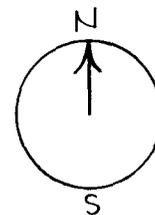
**Original Layout**

Disposal Facility and Unloading Tank  
 Justis SWD Well H-2  
 Unit Letter H, Sec 2, T26S-R37E  
 Lea County, New Mexico



LEGEND:

- A 9'x9'x6.5'DEEP WELL CELLAR
- B 165 GALLON ANNULUS TANK
- C 8'x5.5'x3'DEEP METER PIT
- D 28'DIA. x 8' HIGH REDWOOD TANK 5.5' BELOW GOUND
- E 4" INLET FROM UNLOADING TANK
- F 56'x38'x3.5'DEEP PIT
- G 5.5'x4'x4.5'DEEP REDWOOD INLET BOX
- H 12'DIA. x 10.5' HIGH UNLOADING TANK W/14' STAIR CASE + LANDING
- I HIGH LEVEL ALARM
- J DEADMAN
- K BURM



SE/4, NE/4, SEC. 2, T26S, R37E  
LEA COUNTY NM

DWN	JUSTIS SWD WELL H-2	SCALE
SRT 7-12-01	SCHEMATIC OF LOCATION	1"=20'
	RICE OPERATING COMPANY	DWG NO.
	HOBBS, NEW MEXICO	

District I - (505) 393-6161  
P.O. Box 1980  
Hobbs, NM 88241-1980  
District II - (505) 748-1283  
811 S. First  
Artesia, NM 88210  
District III - (505) 334-6178  
1000 Rio Brazos Road  
Aztec, NM 87410  
District IV - (505) 827-7131

New Mexico  
Energy Minerals and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

Originated 6/27/97

Submit Original  
Plus 1 Copy  
to Santa Fe

PIT INVENTORY FORM

Operator: RICE OPERATING COMPANY

Address: 122 WEST TAYLOR  
HOBBS, NEW MEXICO 88240

Phone Number: (505) 393-9174

Previous Operator(s): None

Is the pit permitted: Yes  No

Unit Letter: H Section: 2 Township: 26S Range: 37E

County: Lea

Location Name: Justis Salt Water Disposal Well H-2

Number of wells to the pit: 1

Are the wells to the pit operated by one operator  or multiple operators

Total daily volume (in barrels) to the pit: None

Pit Type: Emergency

(Emergency, Production, Workover, Reserve/Drilling (greater than 6 months old), Flame, Blowdown, Separator, Dehydrator, Line Drip, BSS/W/Tank Bottoms, Compressor Pigging, Washdown, or other)

What types of wastes are accepted in the pit (Exempt, Non-exempt, Both, None): Exempt (production water)

Pit age (years): 30

Is the pit lined  or unlined

Type of liner (None, Synthetic, Clay): None

Is leak detection present: Yes  No

Is the pit netted: Yes  No

Pit dimensions (LxWxD): 57' X 39' X 5'

CERTIFICATION

I hereby certify that the information submitted is true and correct to the best of my knowledge and belief.

Name: Roger Hall Title: Operations Engineer

Signature: Roger Hall Date: 10/28/97

A pit is defined as any below grade or surface feature which receives any materials other than fresh water.

H-2

DISTRICT I  
P.O. Box 1980, Hobbs, NM 88241-1980

OIL CONSERVATION DIVISION

P.O. Box 2088

Santa Fe, New Mexico 87504-2088

DISTRICT II  
P.O. Drawer DD, Artesia, NM 88211-0719

Permit No. H-72  
(For Division Use Only)

DISTRICT III  
1000 Rio Brazos Rd., Aztec, NM 87410

APPLICATION FOR EXCEPTION TO DIVISION ORDER R-8952  
FOR PROTECTION OF MIGRATORY BIRDS Rule 8(b), Rule 105(b), Rule 312(h), Rule 313, or Rule 711(I)

Operator Name: Rice Engineering Corporation

Operator Address: 122 W. Taylor, Hobbs, New Mexico 88240

Lease or Facility Name Justis SWD System Well H-2 Location H 2 26S 37E  
Ut. Ltr. Sec. Twp. Rge

Size of pit or tank: 57'x39'x5' deep, approx. 2000 bbls.

Operator requests exception from the requirement to screen, net or cover the pit or tank at the above-described facility.

x The pit or tank is not hazardous to migratory waterfowl. Describe completely the reason pit is non-hazardous.  
The pit is used only in emergencies such as major well remedial work.  
Normally kept empty.

1) If any oil or hydrocarbons should reach this facility give method and time required for removal:

Method: Vacuum truck

Time: Within 24 hours of discovery

2) If any oil or hydrocarbons reach the above-described facility the operator is required to notify the appropriate District Office of the OCD with 24 hours.

Operator proposes the following alternate protective measures: \_\_\_\_\_

CERTIFICATION BY OPERATOR: I hereby certify that the information given above is true and complete to the best of my knowledge and belief.

Signature S. A. Haktanir Title Division Manager Date 7-26-90

Printed Name S. A. Haktanir Telephone No. 393-9174

FOR OIL CONSERVATION DIVISION USE

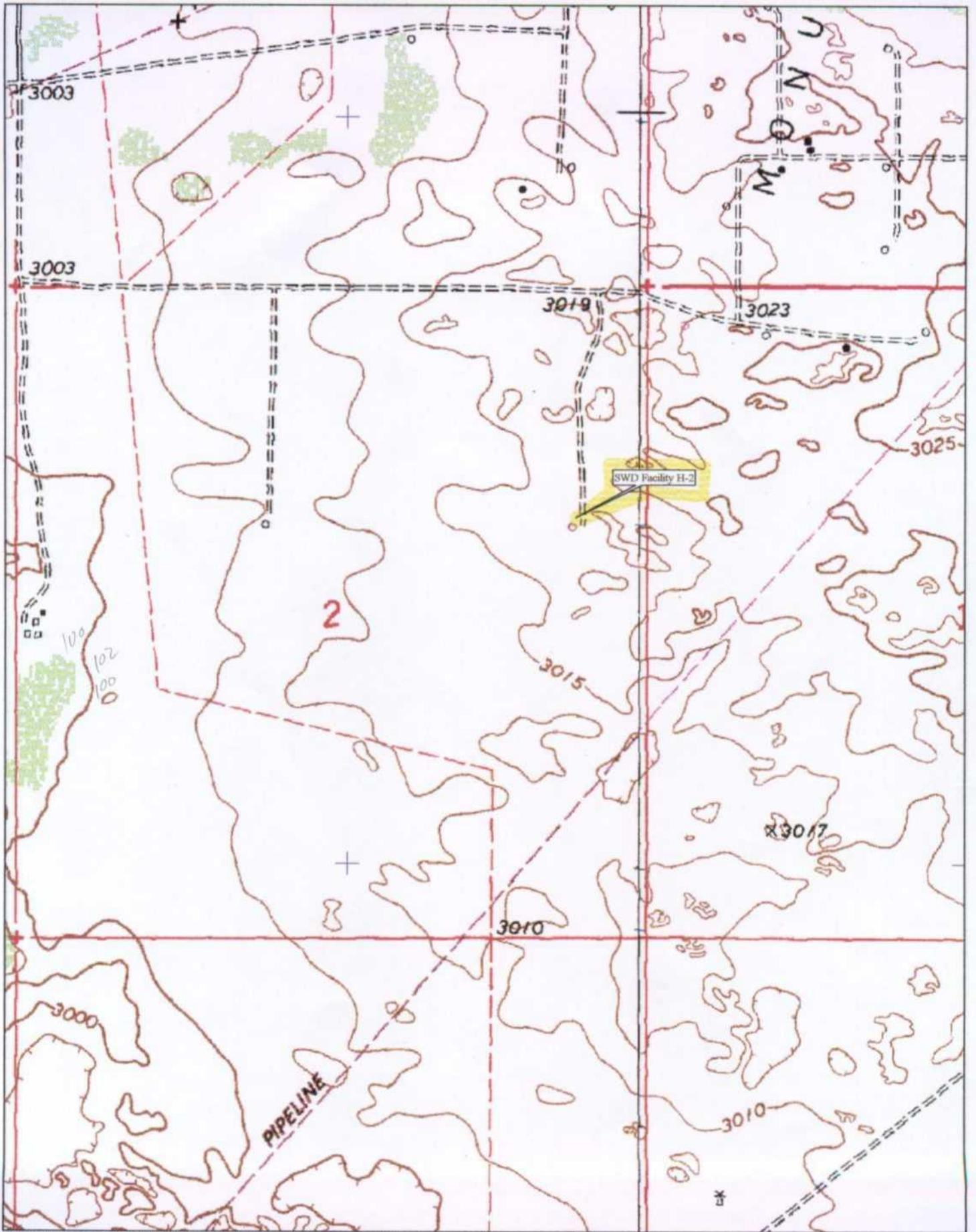
Date Facility Inspected 8/2/90

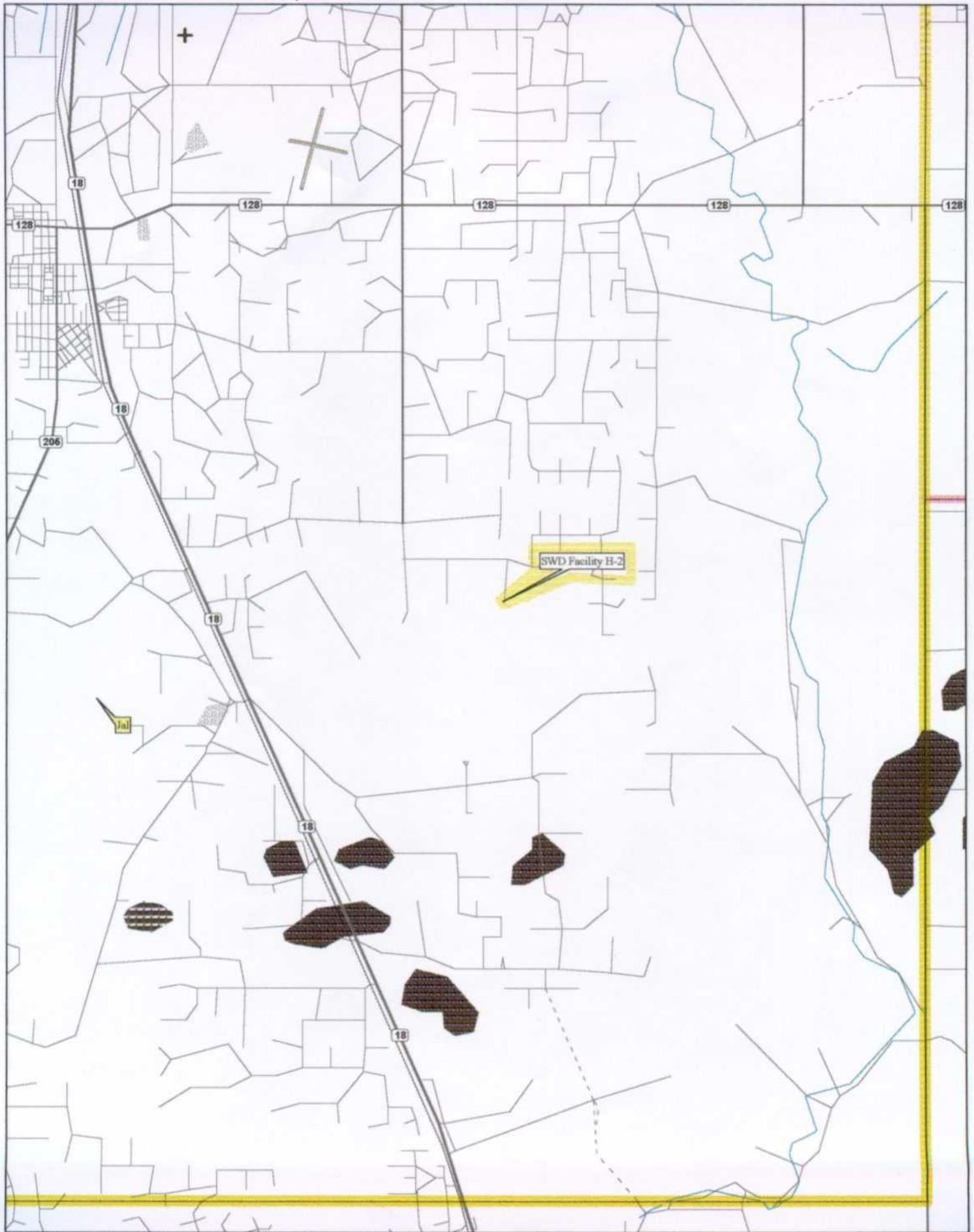
Inspected by R. A. [Signature]

Approved by [Signature]

Title \_\_\_\_\_

Date 8-2-1990





# RICE Operating Company

122 West Taylor • Hobbs, New Mexico 88240  
Phone: (505)393-9174 • Fax: (505) 397-1471

August 2, 2001

George Willis  
Joyce Willis  
P. O. Box 307  
Jal, NM 88252

RE: JUSTIS SWD Facility H-2 Upgrade  
Unit Letter H, Section 2-T26S-R37E  
Lea County, NM

Dear Mr. and Mrs. Willis:

Rice Operating Company (ROC) appreciates opportunities to work with landowners such as you in order to optimize and improve our operation. It is our goal to keep you informed of situations that arise during routine operations concerning the land that we lease for our facility sites.

This letter is regarding the 2.5-acre leased area located in Unit Letter H, Section 2-T26S-R37E, Lea County, NM, where ROC operates the H-2 Disposal Facility for the Justis Salt Water Disposal System. The Lease on this land is current.

ROC will begin upgrading the H-2 Facility in September of 2001 with new fiberglass tanks. The original redwood tank will be eliminated and removed from the facility. The emergency overflow pit will be closed. The area surrounding the tank and pit site will be evaluated for environmental impact and will be remediated to levels designated and/or approved by the New Mexico Oil Conservation Division (NMOCD). As remediation activities progress, ROC will periodically update you and invites you to visit the site. ROC will contact you for information pertaining to replacement soils.

At the completion of this upgrade, a copy of the NMOCD Closure Report will be forwarded to you. If you have any questions, comments or concerns about this upgrade, please don't hesitate to call me at the above phone number.

Sincerely,

Rice Operating Company



Carolyn Doran Haynes  
Operations Engineer

cc LBG, DA, file, NMOCD (2)

# **RICE** Operating Company

122 West Taylor • Hobbs, New Mexico 88240  
Phone: (505)393-9174 • Fax: (505) 397-1471

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z 577 009 529**

February 23, 2000

Mr. Wayne Price  
NM Energy, Minerals and Natural Resources Department  
Oil Conservation Division, Environmental Bureau  
2040 S. Pacheco  
Santa Fe, NM 87505

Re: Revision: Generic Closure Plan for Existing Pits and Below-Grade Redwood Tanks

Mr. Price:

As discussed in our telephone conversation February 22, Rice Operating Company (ROC) is submitting a further revision of the generic work plan for closing redwood tanks and emergency overflow pits that are presently inventoried in the ROC-operated SWD systems in Lea County. (ROC has no ownership of pipelines, wells, or facilities. Each system is owned by a consortium of oil producers, System Partners, who provide operating capital based on percent ownership or usage. Closure projects require AFE approval and work begins as funds are received.)

The revisions ROC proposes involve the on-site disposal of non-impacted concrete when practical and the use of a compacted clay layer rather than poly-liner for lining excavations. Also proposed is a revision to the closure procedure, adding an OCD verbal approval step in order for ROC to timely continue with installation of new surface facilities.

Closure reports for two locations, F-29 (two-year sampling of groundwater) and H-35 (closed), have been processed with the OCD. The P-25 location closure report has been submitted. Locations C-2 and L-21 are in remediation activity right now and Donna Williams has visited both sites. The C-2 site excavation will be managed with RE Environmental and the L-21 site will be managed with Whole Earth. ROC expects to be able to schedule final sampling for early March at both sites. The AFE has been approved for two additional sites in the Eunice-Monument-Eumont area with work start-up planned for early summer.

Thank you for your consideration of these revisions. If you have any questions, please call.



Carolyn Doran Haynes  
Operations Engineer

Cc KH; file; Ms. Donna Williams, OCD District I, Hobbs, NM

## Closure Plan for Below Grade Redwood Tank

1. Submit C-103 form to NMOCD along with the site-specific location, site assessment, work plan, time schedule, sampling and testing plan, etc., all pursuant to NMOCD guidelines.
2. Procure soil samples from 3' below bottom of tanks (9-11' below grade) at tank sides.
  - A. If soil samples are < 100ppm TPH and < 250ppm Chlorides, proceed to Step 4.
  - B. If soil samples are > 100ppm THP or > 250ppm Chlorides, proceed to Step 3.
3. Delineate any portion of tank site that is > 100ppm TPH or > 250ppm Chlorides with a backhoe or soil boring machine, obtaining samples for field and lab analysis at 5' intervals.
  - A. When field analysis of bored-sample determines < 100ppm TPH and < 250ppm Cl, boring will be suspended pending laboratory analysis confirmation. Proceed to Step 4.
  - B. If these parameter levels are not identified, then boring and sampling will continue to ground water. Upon reaching groundwater, the borehole will be cased and developed. Ground water samples will be procured and tested for major cations and anions, TDS and BETX levels. If ground water is found to exceed the WQCC standards, NMOCD will be notified immediately and the closure plan will move into Rule 19 procedures.
4. Write AFE to System Partners as directed by results of delineation of redwood tank site and of emergency pit (if both are at facility). Await approval and funding for site closing.
5. Move onto SWD facility site with temporary tank system. Re-route fluid flow from below grade redwood tanks into the temporary tank system. Plumb to SWD well.
6. Empty and clean redwood tanks, properly disposing of any BS & W. Excavate sides of redwood tanks to allow for working space to manipulate tank support banding. Remove redwood tanks reserving boards for proper disposal.
7. Excavate ramp into redwood tank hole. Remove and properly dispose of concrete base if impacted. If concrete is not impacted, use as fill (below plow depth) in excavation area.
8. Remove impacted soil (as practical) to eliminate hot spots; dispose per NMOCD guidelines.
9. Procure random 5-point composite bottom sample from 3' below tank bottom and random 4-point composite side sample for lab TPH, Benzene, and BTEX testing.
  - A. If <100ppm TPH; BTEX, Benzene <10ppm; <250ppm Chlorides; proceed to Step 11.
  - B. If >100ppm TPH; BTEX, Benzene >10ppm; >250ppm Chlorides; in the vadose zone but not reaching groundwater, proceed to Step 10.
10. Evaluate site for risk assessment: delineate to assess depth and horizontal extent of impact corresponding to NMOCD guidelines for site assessment value; excavate bottom and sides as practical to minimize risk; install compacted clay liner to meet or exceed 95% of a Proctor Test ASTM-D-698 with permeability (hydraulic conductivity) equal or less than  $1 \times 10^{-7}$  cm/sec for containment/isolation of impact.
11. Discuss results/risk assessment with NMOCD for verbal approval to proceed with backfill/installation of new tanks and plumbing within engineered secondary containment system.
12. Apply to NMOCD for closure of redwood tank site per NMOCD guidelines and site results.

**Closure Plan for Permitted Emergency Pits**

1. Submit C-103 form to NMOCD along with the site-specific location, site assessment, work plan, time schedule, sampling and testing plan, etc., all pursuant to NMOCD guidelines.
2. Remove and properly dispose of visibly contaminated soil pursuant to NMOCD guidelines.
3. Procure soil samples from surface and 3' below excavation bottom and excavation sides.
  - A. If soil samples are < 100ppm TPH and < 250ppm Chlorides, proceed to Step 6.
  - B. If soil samples are > 100ppm THP or > 250ppm Chlorides, proceed to Step 4.
4. Delineate any portion of excavation that is > 100ppm TPH or > 250ppm Chlorides with a backhoe or soil boring machine, obtaining samples for field and lab analysis at 5' intervals.
  - A. When field analysis of bored-sample determines < 100ppm TPH and < 250ppm Cl, boring will be suspended pending laboratory analysis confirmation. Proceed to Step 5.
  - B. If these parameter levels are not identified, then boring and sampling will continue to ground water. Upon reaching groundwater, the borehole will be cased and developed. Ground water samples will be procured and tested for major cations and anions, TDS and BETX levels. If ground water is found to exceed the WQCC standards, NMOCD will be notified immediately and the closure plan will move into Rule 19 procedures.
5. Write AFE to System Partners as directed by results of delineation of redwood tank site and of emergency pit (if both are at facility). Await approval and funding for site closing
6. Remove impacted soil (as practical) to eliminate hot spots; dispose per NMOCD guidelines.
7. Procure random 5-point composite bottom sample and random 4-point composite side sample for laboratory TPH, Benzene, and BTEX testing.
  - A. If <100ppm TPH; BTEX, Benzene <10ppm; <250ppm Chlorides; proceed to Step 9.
  - B. If >100ppm TPH; BTEX, Benzene >10ppm; >250ppm Chlorides; in the vadose zone but not reaching groundwater, proceed to Step 8.
8. Evaluate site for risk assessment: delineate to assess depth and horizontal extent of impact corresponding to NMOCD guidelines for site assessment value; excavate bottom and sides as practical to minimize risk; install compacted clay liner to meet or exceed 95% of a Proctor Test ASTM-D-698 with permeability (hydraulic conductivity) equal or less than  $1 \times 10^{-7}$  cm/sec for containment/isolation of impact.
9. Discuss results/risk assessment with NMOCD for verbal approval to proceed with backfill.
10. Apply to NMOCD for closure of permitted emergency pit site per NMOCD guidelines and site results.

**Price, Wayne, EMNRD**

---

**From:** Price, Wayne, EMNRD  
**Sent:** Wednesday, June 07, 2006 4:51 PM  
**To:** 'Tim Reed'  
**Cc:** Sanchez, Daniel J., EMNRD; Kristin Farris Pope  
**Subject:** RE: ROC, Justis H-2 SWD, (AP-49) Stage II AP

OCD has reviewed the stage 2 abatement plan for the above subject site AP-49 and hereby deems it is administrative complete. Please issue public notice pursuant to Rule 19 and provide proof of notice as soon as possible so OCD may issue final approval to proceed.

---

**From:** Tim Reed [mailto:treed@hec-enviro.com]  
**Sent:** Saturday, May 27, 2006 10:21 AM  
**To:** Price, Wayne, EMNRD  
**Cc:** Sanchez, Daniel J., EMNRD; Kristin Farris Pope  
**Subject:** ROC, Justis H-2 SWD, (AP-49) Stage II AP

5-27-06

Mr. Wayne Price  
NMOCD  
Santa Fe

Mr. Price:

Enclosed is the Stage II Abatement Plan for the Rice Operating Company, Justis H-2 site (AP-49). A hard copy including appendices and CD will be sent to you as well.

Tim Reed, P.G.  
Vice President  
Highlander Environmental Corp.  
office - (432) 682-4559  
fax - (432) 682-3946  
cell - (432) 557-4680

6/7/2006