AP- S8

STAGE 1 & 2 REPORTS

DATE: 10-10-10-12

Hansen, Edward J., EMNRD

From:

Katie Jones <kjones@riceswd.com>

Sent:

Wednesday, October 10, 2012 3:31 PM

To:

Hansen, Edward J., EMNRD

Cc:

Hack Conder; Laura Pena; Lara Weinheimer

Subject:

ROC - BD Santa Rita EOL Release Site (AP-58) Soil Closure Request

Attachments:

BD Santa Rita EOL (AP-58) Soil Closure Request.pdf

Mr. Hansen,

Attached is a Soil Closure Request for the BD Santa Rita EOL (AP-58) site. A paper copy will be sent via certified mail. If you have any questions or require any additional information please contact myself or Hack Conder at (575)393-9174.

Thank you.

Katie Jones
Environmental Project Manager
RICE Operating Company

RICE Operating Company

122 West Taylor • Hobbs, New Mexico 88240 Phone: (575) 393-9174 • Fax: (575) 397-1471

CERTIFIED MAIL
RETURN RECEIPT NO. 7007 2560 0000 4569 9385

October 10, 2012

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: Soil Closure Request

BD Santa Rita EOL Release (AP-58): UL/A, Sec. 27, T22S, R37E

RICE Operating Company – BD SWD System

Mr. Hansen:

Rice Operating Company (ROC) is the service provider (agent) for the Blinebry-Drinkard (BD) Saltwater Disposal (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.

Background

The Santa Rita EOL Release site is operated by Rice Operating Company (ROC) and is located in Township 22 South, Range 37 East, Section 27, unit letter A approximately 4.5 miles southeast of Eunice, NM. Depth to groundwater at this site is approximately 53 +/- ft below ground surface.

The discovery of a brine water release from a 2-inch PVC compression coupling occurred on November 22, 2003. Initial characterization of soil impacts were conducted at the site on November 26, 2003 using a backhoe. Soil samples were collected at 16 locations to depths of 3 to 4 feet below ground surface (bgs) with a hand auger to determine the horizontal extent of the impacted soils on August 9, 2005. On August 30, 2005, a drilling rig was mobilized approximately 5-feet east of the release point for vertical delineation of the vadose zone. Since August 2005, 4 monitoring wells have been installed at the site. MW-1 was then plugged and replaced with a 4 inch recovery well (RW-1). These wells have been sampled on a quarterly basis since installation. An Amended Stage 1 and 2 Abatement Plan was

submitted to the NMOCD on April 24, 2008. A modification was made on September 26, 2008 and an Addendum was submitted on February 3, 2009. The report and subsequent addendums were then approved by the NMOCD on February 4, 2009.

According to the approved Abatement Plan, liner installation and groundwater recovery has been conducted at the site.

SOIL

Beginning March 24, 2009, the site was excavated to a depth of 30 ft bgs and a 40x20 ft clay liner was installed in the bottom of the excavation. A compaction test was performed and a 40x20 ft, 20-mil plastic liner was installed over the clay. Sand was placed above the plastic liner and caliche was used used to backfill the excavation up to 12 ft bgs. At 12 ft bgs, a 40x50 ft clay liner was installed and a compaction test was performed. A 40x50 ft, 20-mil plastic liner was then placed over the clay. Sand was placed above the plastic liner and caliche was used to backfill the excavation up to 5 ft bgs. Sand was then used to backfill the site to ground surface and the site was contoured to the surrounding area. Amendments were added to the soil, the site was seeded, and silt net fencing was installed surrounding the site. A Stage 2 Progress Report detailing the activities was submitted to the NMOCD on August 3, 2010.

GROUNDWATER

Groundwater recovery began from RW-1 on June 22, 2010. Since groundwater recovery began, approximately 23,810 barrels of groundwater have been recovered and subsequently utilized for pipeline and well maintenance.

Abatement actions performed on the soil at this site will prevent the migration of any residual constituents in the soil. As such, ROC requests 'Soil Closure' or similar closure status. A recent photograph showing vegetation is attached. ROC will continue groundwater recovery and the progress will be evaluated at the end of 2012 and recommendations will be submitted to the NMOCD in the 2012 Annual Groundwater Report.

Please contact me at (575)393-9174 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,

RICE Operating Company

Hack Conder

Environmental Manager

enclosures

BD Santa Rita EOL Release (AP-58)

UL/A, Sec. 27, T22S, R37E



Facing Southeast 9/18/2012