1R-427-181

REPORTS

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Investigation and Characterization Report and Termination Request Rice Operating Company – EME SWD System Phillips B EOL UL F Sec 10 T 20S R 37E NMOCD Case Number: 1R427-181



April 7th, 2009

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Investigation and Characterization Report and Termination Request

Phillips B EOL UL F Sec 10 T 20S R 37E NMOCD Case Number: 1R427-181

Executive Summary

This report summarizes the findings of investigative work prescribed in the NMOCD approved Investigation and Characterization Plan (ICP) for this site.

Rice Operating Company replaced a wooden junction box at this location with a new, water-tight junction in July of 2004 as part of its facility maintenance and upgrade program. Preliminary site investigation associated with the junction box replacement indicated significant residual soil chloride concentrations but insignificant petroleum hydrocarbon concentrations.

The field investigation under the ICP was completed on September 8th, 2008. Five soil borings were advanced near and around the location of the former junction box to depths of 40 to 50 ft bgs where the water table capillary fringe was encountered. Soil chloride concentrations averaged 525 ppm throughout the depth of drilling but less than 250 ppm in these bottom layers above the water table. Soil petroleum hydrocarbons were insignificant. The ground surface surrounding the former junction box has become restored to natural prairie grasses and associated vegetation.

A simple soil chloride transport and groundwater dilution model was developed to estimate the potential effect of residual soil chloride leaching into groundwater. The model predicted that maximum anticipated elevation of groundwater chlorides caused by the movement of residual soil chlorides is less than 150 ppm, indicating that residual soil chlorides should not represent a hazard to groundwater quality.

Given that there are no apparent risks of groundwater contamination from this former junction box and that surface/ecological impacts are negligible, it is therefore requested that NMOCD grant Rice Operating Company a "remediation termination" or similar closure status for this project.

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Background

This report summarizes the findings of investigative work prescribed in the Investigation and Characterization Plan (ICP) for this site, which was approved by NMOCD on July 17th, 2008 (a copy of e-mail approval is given in the Appendix).

The site is located approximately 2.7 miles southeast of Monument, New Mexico (Figures 1&2) in the rolling sandy hills (the "White Breaks") that characterize this area. The Lea County Soil Survey characterizes the surficial earth materials as sandy, moderately deep to deep sandy soils which are underlain by caliche of variable hardness. NM OSE records indicate that groundwater is likely to be encountered at a depth of 20+/- feet in unconsolidated Tertiary alluvium of the Ogallala Formation. However, field investigation encountered the capillary fringe at about 50 ft bgs.

Rice Operating Company replaced a wooden junction box at this location with a new, water-tight junction in July of 2004 as part of its facility maintenance and upgrade program. As the original wood junction box was removed, soils were sampled using a backhoe creating a 20 by 10 by 12 ft deep excavation. The excavated soils were blended and then backfilled into the excavation. The disturbed surface was then seeded with a native vegetation mix.

Insignificant concentrations (< 100 ppm) of gasoline (GRO) and diesel range organics (DRO) were encountered in the excavated soil and in the sidewalls and bottom of the excavation. Petroleum hydrocarbons were therefore ruled out as a potential constituent of concern. Chloride concentrations exceeded 2,000 ppm at adjacent sampling locations at depths of 11 ft below ground surface (bgs). The surface (ecological) impact of this release was relatively small.

Objective, Scope and Methodology

The <u>objective</u> of the ICP is to: **a**- quantify the magnitude and extent of residual soil chlorides and petroleum hydrocarbons; **b**- determine if these pose a threat to groundwater quality under present conditions and **c**- develop a Corrective Action Plan (CAP) to protect groundwater if this is warranted.

The <u>scope</u> of the ICP encompasses the measured effects of past operations of the facility on soil and groundwater in the affected vicinity.

The <u>methodology</u> of the ICP entailed: **a**- drilling to obtain subsurface soil samples; **b**- analyzing these for chlorides using field titration procedures and for petroleum hydrocarbons using a Photo-ionization Detector (PID); **c**- verifying (QA/QC) the field methods against a subset of samples analyzed by a commercial laboratory; **d**- analyzing the data using graphical and statistical methods and **e**- interpreting the data using a simple mass-balance dilution model.

The field investigation was completed on September 8th, 2008. Harrison and Cooper, Inc. provided drilling services and Rice Operating Company personnel performed field chloride titrations and PID analyses. L. Peter Galusky, Jr. of Texerra supervised field activities. Confirmatory laboratory analyses were subsequently performed by Cardinal Laboratories.



Figure 1 – EME Phillips B EOL location map on USGS topo base.



Figure 2 – Phillips B EOL location on Google aerial photograph (date unknown).

Results and Discussion

Five soil borings were advanced near and around the location of the former junction box to depths of 40 to 50 ft bgs where the water table capillary fringe was encountered (Figure 3). Soil chloride concentrations averaged 525 ppm throughout the depth of drilling but less than 250 ppm in these bottom layers above the water table (Figure 4). The total mass of residual soil chlorides at this location was estimated to be 3,430 lbs (Figure 5). Soil petroleum hydrocarbons were insignificant (below 1.0 ppm by PID and below laboratory detection limits; Appendices B&C).

In order to determine if the residual soil chlorides represent a potential hazard to down gradient groundwater quality, a simple soil chloride transport and groundwater dilution model (Figures 6 & 7) was developed to estimate the potential effect of this residual soil chloride leaching into groundwater over time given the following assumptions:

- 1. The center of mass of residual chlorides moves downward at a rate of 2.0 ft/yr.
- 2. It is assumed that these chlorides mix uniformly within an elliptical groundwater plume of dimensions 250 ft maximum length by 100 ft maximum width through a depth of 15 ft of the water table aquifer.
- 3. Natural dilution of the plume occurs at a rate of 10% per year.

The model predicted that maximum anticipated elevation of groundwater chlorides caused by the movement of residual soil chlorides is under 150 ppm (Figure 8), indicating that residual soil chlorides should not represent a hazard to groundwater quality.

The ground surface surrounding the former junction box has become restored to natural prairie grasses and associated vegetation (see cover photo and Appendix D).

Given that there are no apparent risks of groundwater contamination from this former junction box and that surface/ecological impacts are negligible, it is therefore requested that NMOCD grant Rice Operating Company a "remediation termination" or similar closure status for this project.

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



Figure 3 – Locations of soil bores relative to former junction box. The average, field-measured soil chloride concentrations are given for depths 30 to 50 ft bgs (for 30 to 40 ft bgs for SB-1). These bottom soil chloride concentrations averaged 234 ppm over all five soil borings.





Soil Chloride Calculator		
Estimates Mass of Soil Chi	oride, based upon So	il Chloride Concentration
Rice Operating Company		
Site:	EME Phillips B EOL	
This estimate prepared by:	L. Peter Galusky, Jr.	
Date:	4/1/2009	
Inputs in Blue Font		
length of affected area (ft)		35
width of affected area (ft)		35
affected area (sq ft)		1,225
affected depth (ft)		48
depth to water table (ft)		50
avg CI- conc of affected so	il (ppm)	525
unsat zone mass density (I	bs/cu yd)	3,000
volume of affected soil (cu	yds)	2,178
total mass of affected soils	6	
(lbs)	6,	533,333
mass of residual soil chlori	ide (Ibs)	3,430

Figure 5 - Estimation of residual soil chloride mass.



Figure 6- Schematic diagram of soil chloride – groundwater dilution model.

groundwater_chloride_mass_lbs(t) = groundwater_chloride_mass_lbs(t - dt) + (chloride_leaching_lbs_per_yr - natural_groundwater_dilution) * dt INIT groundwater_chloride_mass_lbs = 0

INFLOWS: chloride_leaching_lbs_per_yr = (chloride_leaching_rate/depth_to_groundwater)*soil_chloride_mass_lbs OUTFLOWS: natural_groundwater_dilution = groundwater_chloride_mass_lbs*groundwater_dilution_rate soil_chloride_mass_lbs(t) = soil_chloride_mass__lbs(t - dt) + (chloride_leaching_lbs_per_yr) * dt INIT soil_chloride_mass__lbs = 3430

OUTFLOWS:

chloride_leaching_lbs_per_yr = (chloride_leaching_rate/depth_to_groundwater)*soil_chloride_mass_lbs aquifer_porosity = 0.33 baseline groundwater chloride concentration = 0 chloride_leaching_rate = IF(infiltration_barrier_?=0) THEN 2.0 ELSE 2.0/20 depth to groundwater = 50eliptical plume length = 250eliptical_plume_max_wisth = eliptical_plume_length/2.5 groundwater chloride concentration ppm = 119962*(groundwater_chloride_mass_lbs)/(groundwater_plume_volume*7.5)+baseline gr oundwater chloride concentration groundwater Cl std = 250 groundwater_dilution_rate = 0.1 groundwater_plume volume = (3.14*(eliptical_plume_length/2)*(eliptical_plume_max_wisth/2)*groundwater thickness)* aquifer_porosity groundwater_thickness = 15 infiltration barrier ? = 0

Figure 7 – Model equations and parameter values for soil chloride – groundwater dilution model.



Figure 8 – Estimated change in baseline groundwater chloride concentrations (right axes) over time.

APPENDICES

- Appendix A NMOCD approval of Investigation and Characterization Plan
- Appendix B Soil bore descriptions and analytical data
- Appendix C Laboratory data
- Appendix D Photographs

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Subject: ICP Approvak	s: #1R427-06; #1R427-1	61; #1R426-11	7; #18426-150		
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To: "Hack Conder	r" < hoonder@riceswd.con	3.2			
CC: Price, Wayne	e, EMNRD" < azyne.prioel	∳state.sm.us>.	สร้ายเองรฐิงส่วยาศ.com	, lpg@1exerra.com	
Dear Mr. Conder:					
The New M Investigation Char referenced sites. T Operating Compan	Iexico Oil Conserv acterization Plans The NMOCD hereb ny sites:	ration Divis ICPs), date y condition:	ion (NMOCD) has d May 30, 2008 an ally approves the f	reviewed the sub d June 3, 2008, fo ollowing FCPs for	unitted or the above the Rice
1.	EME SWD Jci	<u>. O-19</u> subn	nitled by Texerra o	n 6/6/2008#1R43	27-06
2.	EME SWD Ph	illips 'B' E(<u>DL</u> submitted by T	exerra on 6/6/200	8#1R427-181
3.	BD SWD Oxy	Owen 'A' s	abmitted by Texer	та сл 6/6/2008#1	R426-117
4.	BD SWD Jet 1	<u>P-35-1</u> subm	titted by Texerra o	n 6/6/2008#1R42	26-150
In the proposed wo 250 mg/Kg.	ork elements for all	ICPs please	e include that the d	elineation of chic	rides will be to
In the proposed wo <u>Owen 'A'</u> (#1R426 ppm using a PID (c	ork elements for <u>EM</u> 5-117) please inclu or equivalent).	<u>4E SWD Ph</u> de that the d	hillips *B' EOL (#1 Relineation of petro	R427-181) and <u>#</u> #eum hydrocarbo	I <u>D SWD Oxy</u> as will be to 100
Also, for <u>BD SWD</u> for petroleum hydr	<u>) Oxy Owen "A"</u> (# Dearbons.	1 R 426-117)	please include re-	sampling of the t	ackfill material
In the proposed we chemistry" (includi	ork elements for all ing chloride, TDS,	ICPs please and sulfate)	include the analy and BTEX for po	ses for "general tential groundwal	ær sampling.
Also, please be adv responsibility shoul environment. In ad compliance with an	ised that NMOCD Id operations pose Idition, NMOCD a Ny OCD, federal, si	approval of a threat to g pproval doe ate, or local	f these plans does i round water, surfa s not relieve the or laws and/or regul	not relieve the ow ce water, human wner/operator of r ations.	ner/operator of health or the esponsibility for
http://b4.mail.yahoo	o.com/yny/iexerra.c	om/ShowLa	etter?box=Rice%2	00perating%20C	o.&M 8/4/2008

Appendix A – NMOCD approval of Investigation and Characterization Plan.





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Appendix B2 – Soil boring SB-2 cuttings descriptions and analytical data.



Appendix B3 – Soil boring SB-3 cuttings descriptions and analytical data.







Appendix B5 - Soil boring SB-5 cuttings descriptions and analytical data.



Appendix C1 – Cardinal Laboratories soil analysis data



Appendix C2 - Cardinal Laboratories sample chain-of-custody form.



Appendix D1 – View from SB-5 toward SE across former junction box location.



Appendix D2 – View across SB-5 toward NW looking down-slope.



Appendix D3 – View across SB-1 (and former jct box location) toward WSW.