

Re: [EXTERNAL] BD I-18 EOL (1R426-13) CAP and Variance Request - Incident ID nAPP2109856086

Velez, Nelson, EMNRD <Nelson.Velez@emnrd.nm.gov>

Thu 6/29/2023 12:11 PM

To:Katie Jones <kjones@riceswd.com>

Good afternoon Katie,

Thank you for the correspondence. OCD approves your variance request as written.

Please keep a copy of this communication for inclusion within the appropriate report submittal.

The OCD requires a copy of all correspondence relative to remedial activities be included in all proposals and/or final closure reports. Correspondence required to be included in reports may include, but not limited to, notifications for liner inspections, sample events, spill/release/fire, and request for time extensions or variances.

Regards,

Nelson Velez • Environmental Specialist - Adv  
Environmental Bureau | EMNRD - Oil Conservation Division  
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**From:** Katie Jones <kjones@riceswd.com>  
**Sent:** Thursday, June 29, 2023 10:51 AM  
**To:** Velez, Nelson, EMNRD <Nelson.Velez@emnrd.nm.gov>  
**Subject:** [EXTERNAL] BD I-18 EOL (1R426-13) CAP and Variance Request - Incident ID nAPP2109856086

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Mr. Velez,

Per our conversation, ROC submits the following Variance Request Addendum to the BD I-18 (1R426-13) CAP and Variance Request submitted to NMOCDD on March 14, 2023.

- ROC acknowledges the BD I-18 EOL site falls under the Tier 2 category of delineation standards listed on Table 1 of NMAC 19.15.29.12 based on the depth to groundwater. The site has been fully delineated to concentrations listed in Table 1, as such, ROC will delineate the upper 4 ft of the vadose zone to the reclamation standards listed in NMAC 19.15.29.13, Section C. Hydrocarbons were not observed in any samples collected from soil bores; therefore, ROC requests to only sample for chloride going forward.
- ROC requests to defer the remediation of the upper 4 ft of the vadose zone immediately surrounding the active, buried 8 inch poly line and the existing concrete junction boxes, along with a 5 ft buffer on each side of the active poly line and a 5 ft buffer surrounding the concrete boxes. ROC requests this deferral according to NMAC 19.15.29.12, Section C, Paragraph 2. Excavating the buried 8 inch poly line and near the concrete junction box could pose potential safety risks to field personnel. As such, ROC proposes to excavate an area of approximately 8,920 sq ft south of the active line and approximately 2,688 sq ft north of the pipeline to a depth of 4 ft bgs. Any impact within the 5 ft buffer on either side of the active line, underneath the active line, within the 5 ft buffer around the concrete junction boxes, or beneath the junction boxes will be addressed at system abandonment once the pipelines and concrete boxes are removed.
- Once the 8,920 sq ft an the 2,688 sq ft areas have been excavated to a depth of 4 ft bgs, ROC will collect a 5 pt composite wall sample every 100 lateral feet (400 sq ft).
- Excavated soil will be analyzed for use as backfill. A 5 pt composite sample will be collected for every 50 cubic yards of excavated soil. The composite samples will be analyzed for chloride only and any soil used as backfill will have a chloride concentration of 600 mg/kg or lower.

Site	Case #	PO Number	Submission ID	Reference ID	Incident ID	App Number	Report
BD I-18 EOL	1R426-13	OC7LT-230314-C-1410	196835	nAPP2109856086	nAPP2109856086	pEEM0432442802	CAP

Thank you for your time and consideration. Please let me know if you have any questions or require any additional information.

Thank you,

Katie Davis  
Environmental Manager  
RICE Operating Company

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

CONDITIONS

Action 237896

**CONDITIONS**

Operator: RICE OPERATING COMPANY 122 W Taylor Hobbs, NM 88240	OGRID: 19174
	Action Number: 237896
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

**CONDITIONS**

Created By	Condition	Condition Date
nvelez	None	7/10/2023