

AP - 27

**STAGE 1 & 2
REPORTS**

DATE:

10-11-12

Hansen, Edward J., EMNRD

From: Katie Jones <kjones@riceswd.com>
Sent: Thursday, October 11, 2012 8:25 AM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder; Laura Pena; Tim Reed
Subject: ROC - BD E-15 (AP-27) Soil Closure Request
Attachments: BD E-15 (AP-27) Soil Closure Request pdf.pdf

Mr. Hansen,

Attached is a Soil Closure Request for the BD E-15 (AP-27) 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 11, 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 E-15 (AP-27): UL/D&E, Sec. 15, T22S, R37E
RICE Operating Company – Blinbry-Drinkard SWD System

Mr. Hansen:

Rice Operating Company (ROC) is the service provider (agent) for the 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

On March 29, 2000, a leak was discovered on the pipeline adjacent to the E-15 junction box. According to the form C-141 (Initial) filed with the NMOCD, the spill was due to a rupture in a steel dresser sleeve. Depth to groundwater at this site is approximately 75 +/- ft below ground surface.

During March 2000, approximately 2,000 cubic yards of soil were excavated and transported offsite for disposal. The site was backfilled with clean soil and brought up to grade. Initial characterization of soil impacts was conducted at the site. In order to delineate the site, between January 22, 2001 and February 11, 2005, six monitor wells, two recovery wells and six borings were installed at the site.

A Stage 1/Stage 2 Abatement Plan was requested by the NMOCD and was submitted on June 5, 2001. The abatement plan requested additional soil borings and monitor wells at the site to complete vertical and horizontal delineation.

SOIL

In January 2002, the release area was excavated to a depth of 35 ft bgs and a 140 ft x 160 ft clay liner was installed in the bottom of the excavation. A compaction test was performed

and a 20-mil plastic liner was installed over the clay and brought up the sides of the excavation to the surface. The excavated soils were used to backfill the excavation up to a depth of 5 feet bgs. A second 140 ft x 160 ft, 20-mil liner was installed and the remainder of the excavation was backfilled with clean topsoil and contoured to the surrounding surface.

In September 2006, the NMOCD requested further expansion of the abatement plan to encompass a larger area. The amended Stage 1/Stage 2 plan was resubmitted in November 2006.

GROUNDWATER

In 2005, a groundwater remediation system was installed at the site to address the chloride impacts to the groundwater and was discontinued in 2007 due to low volumes, silting, and equipment problems. Several of the silted or dry monitor wells were permanently abandoned (MW-5, MW-6 and RW-2). Since 2005, the four active monitor wells (MW-1 through MW-4) have been sampled on a quarterly basis. A work plan was submitted, and approved by NMOCD on February 17, 2011, proposing to install three additional monitor wells to further delineate groundwater quality. In March 2011, three monitor wells MW-6R, MW-7 and MW-8 were installed.

A Project Status Report was submitted to the NMOCD on June 17, 2011 with proposed replacement of MW-2 with a 4-inch recovery well. NMOCD approved the plan on August 22, 2011. MW-2 was plugged and replaced with a 4-inch well (MW-2R) in October 2011. Monitor well MW-2R has been sampled since January 2012.

In the Proposed Groundwater Remediation report submitted to the NMOCD on April 17, 2012, ROC proposed to remove 335,104 gallons of chloride impacted groundwater from MW-2R. Groundwater recovery began from MW-2R on June 28, 2012. Since groundwater recovery began, approximately 47,124 gallons 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 termination request will be submitted to the NMOCD once groundwater recovery efforts are completed.

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 E-15 (AP-27)
UL/D&E, Sec. 15, T22S, R37E



Facing South-Southwest

10/1/2012

Hansen, Edward J., EMNRD

From: Laura Pena <lpena@riceswd.com>
Sent: Thursday, October 11, 2012 2:19 PM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder; Katie Jones
Subject: BD E-15 (AP-27) Photo Documentation
Attachments: BD E-15 (AP-27) Photo Documentation.pdf

Mr. Hansen,

Attached is the photo documentation for the BD E-15 (AP-27) site as requested.

Let us know if you have any questions or require any additional information.

Thank you,
Laura

BD E-15 (AP-27)
Unit D&E, Section 15, T22S, R37E



10/1/2012



8/15/2008



8/15/2008