1R. 4-26-101

# GENERAL CORRESPONDENCE

YEAR(S): 2007



### RECEIVED

Infrastructure, buildings, environment, commiscation 26 AM 11-20

ARCADIS U.S., Inc. 1004 N. Big Spring Street Suite 300 Midland Texas 79701 Tel 432.687.5400 Fax 432.687.5401 www.arcadis-us.com

Ed Hansen New Mexico Oil Conservation Division 1220 So. Saint Francis Drive Santa Fe, New Mexico 87505

Certified Mail Receipt No. 7002 2410 0001 5813 2527

Subject:

Investigation and Characterization Plan Blinebry Drinkard (BD) H-14 T22S R37F Section 14 Unit H Funice

T22S, R37E, Section 14, Unit H, Eunice, Lea County, New Mexico

Dear Mr. Hansen,

RICE Operating Company (ROC) has retained ARCADIS U.S., Inc. to address potential environmental concerns at the above-referenced site. ROC is the service provider (agent) for the Blinebry Drinkard (BD) 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 Partners, who provide all operating capital on a percentage ownership/usage basis. Environmental projects of this magnitude require System Partner AFE approval and work begins as funds are received. In general, project funding is not forthcoming until NMOCD approves the work plan. Therefore, your timely review of this submission is requested.

For all environmental projects, ROC will choose a path forward that:

- protects public health,
- provides the greatest net environmental benefit,
- complies with NMOCD Rules, and
- is supported by good science.

Each site shall have three submissions or a combination of:

- 1. This <u>Investigation and Characterization Plan</u> (ICP) is a proposal for data gathering and site characterization and assessment.
- 2. Upon evaluating the data and results from the ICP, a recommended remedy will be submitted in a <u>Corrective Action Plan</u> (CAP).
- 3. Finally, after implementing the remedy, a <u>closure report</u> with final documentation will be submitted.

On behalf of ROC, ARCADIS respectfully submits this ICP for the above-referenced site.

Date: 24 September 2007

BD H-14-1 1R426-102 BD H-14-1 1R426-102 BD H-14-2 1R426-101

> Contact: Sharon Hall

Email:

Phone: 432 687-5400

shall@arcadis-us.com

Ed Hansen September 24, 2007

#### **ARCADIS**

#### SITE HISTORY AND BACKGROUND

This site is comprised of a three junction-box group in close proximity to one another (see attachment). Due to their close proximity the sites have been combined as a single site referred the H-14 site. The site is located near the town of Eunice, New Mexico Figure 1. The expected depth to groundwater at this site is approximately 65 feet below ground surface.

The junction box H-14-1 was the main-line box of the three-box group. It was replaced with a new water-tight junction box. The junction box H-14-2 has been eliminated and Junction H-14 contained a boot that has been eliminated. Both junctions have been replaced with polypiping that bypasses the former locations.

Initial delineation of the three-box group began on May 17, 2004 and was completed on June 8, 2004 by trenching with a backhoe to a depth of 12-15 below ground surface (bgs). An area 38 feet x 36 feet x 6 feet-deep was excavated. A compacted clay barrier was installed at a depth of 6 feet bgs to inhibit downward chloride migration. The excavated area was then backfilled with the remaining blended excavation soil. An identification plate has been placed on the surface in the location of the former junction box for future environmental consideration and to identify the presence of the clay barrier. The disturbed surface has been seeded with a blend of native vegetation and is being monitored for growth.

Soil samples were analyzed in the field for chlorides using field-adapted Method 9253 and screened in the field using a photoionization detector (PID). Confirmation samples were collected from the bottom, side walls (four wall composite sample), and remediated backfill and sent to Environmental Lab of Texas for Total Petroleum Hydrocarbons (TPH) and Chloride analysis. PID readings were all low. Laboratory analysis confirms that gasoline range organics (GRO) and diesel range organics (DRO) were not detected.

Based on the results of the soil sampling analytical results, elevated chloride concentrations are present at the subject site as shown in Figure 2.

ROC disclosed potential groundwater impact at the site to New Mexico Oil Conservation Division (NMOCD) in an e-mail dated July 16, 2004. Disclosure reports were submitted to NMOCD with all of the ROC 2004 Junction Box Reports in March 2005 per the ROC Junction Box Upgrade Workplan. The disclosure reports identified the sites as the junction H-14-1, H-14-2 and H-14 Boot sites. The source of this impact is historical. There is no longer a threat of compounded conditions at this site because two junctions were eliminated and the third was replaced with a water-tight junction box.

Ed Hansen September 24, 2007

#### **ARCADIS**

#### INVESTIGATION AND CHARACTERIZATION PLAN

As discussed above existing site data suggest a potential for impairment of ground water quality. Therefore the work elements described below are designed to assist ROC in selecting an appropriate vadose zone remedy and, if necessary, a ground water remedy.

#### Task 1- Collect Regional Hydrogeologic Data

A one-half mile water well inventory will be performed. The water well inventory will include a review of water well records listed on the New Mexico State Engineer Office and United States Geological Survey (USGS) websites and windmills indicated on applicable USGS topographic maps.

#### Task 2- Evaluate Concentrations of Constituents of Concern in Soil (and Groundwater

One soil boring will be installed at the subject site at the former junction box location in order to delineate the depth of impacts to soil. Soil samples will be collected at regular intervals no greater than five feet, screened in the field using a photo ionization detector (PID) and field tested for chlorides. Soil lithology and the presence of any observed staining or odor will be recorded. Representative select samples will be submitted to a laboratory for laboratory analysis as confirmation of the field sampling.

Additional soil borings will be will be installed in each direction (north, south east and west of the excavated area) in order to delineate the lateral extent of impacts to soil. Soil samples will be collected at regular intervals no greater than five feet, screened in the field using a photo ionization detector (PID) and field tested for chlorides. Soil lithology and the presence of any observed staining or odor will be recorded. Representative select samples will be submitted to a laboratory for laboratory analysis as confirmation of the field sampling.

If chloride and/or hydrocarbon concentrations do not decline sufficiently with depth or exceed 250 milligrams per kilogram (mg/kg) or PID readings of 100 within 10 feet of the suspected groundwater depth monitoring well will be installed. The monitoring well will be placed near-source to observed soil impacts.

The monitor well will be constructed, developed and sampled in accordance with Environmental Protection Agency and NMOCD standards. A groundwater sample will be collected and submitted for laboratory analysis for chlorides, BTEX and general chemistry.

Ed Hansen September 24, 2007

#### **ARCADIS**

If analytical results indicate that chloride and/or BTEX concentrations in groundwater exceed New Mexico Water Quality Control Commission standards, additional monitoring wells may be installed as warranted by the results of the investigation.

#### Task 3 Evaluate Potential Flux from the Vadose Zone to Ground Water

The information gathered from tasks 1 and 2 will be evaluated and utilized to design a groundwater remedy if needed. The ground water remedy that offers the greatest environmental benefit while causing the least environmental impairment will be selected. If the evaluation demonstrates that residual constituents pose no threat to ground water quality, only a surface restoration plan protective of groundwater will be proposed. Such recommendations and findings will be presented to NMOCD in a subsequent Corrective Action Plan (CAP). When evaluating any proposed remedy or investigative work, ROC will confirm that there is a reasonable relationship between the benefits created by the proposed remedy or assessment and the economic and social costs.

A report that details the investigation activities and results will be submitted to the OCD. The report will include recommendations for further action (CAP) if necessary or for closure of the site.

Very Truly Yours,

ARCADIS U.S., Inc.

Shawn E. Half

Sharon E. Hall

Site Evaluation Department Manager

Copies:

Carolyn Haynes- Rice Operating Company Kristin Pope- Rice Operating Company

Attachment:

Figures 1-2

Disclosure reports with field sampling results

**Excavation Diagram** 

# BD jct H-14-1 38 x 36 x 6-ft-deep

Excavation Cross-Section

× ×



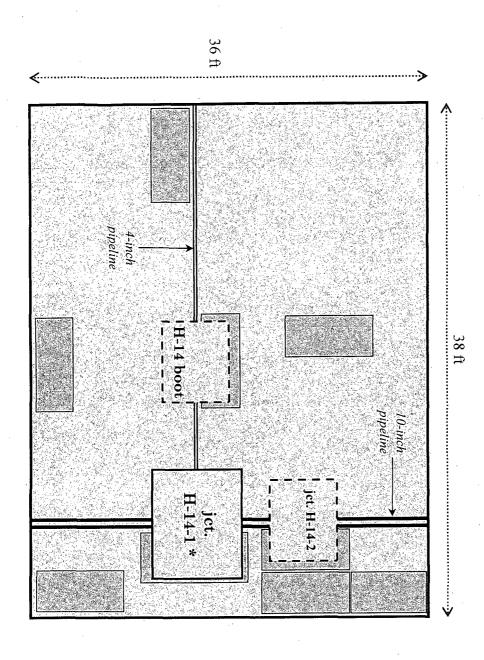
Excavation to 6 ft BGS, with compacted clay barrier

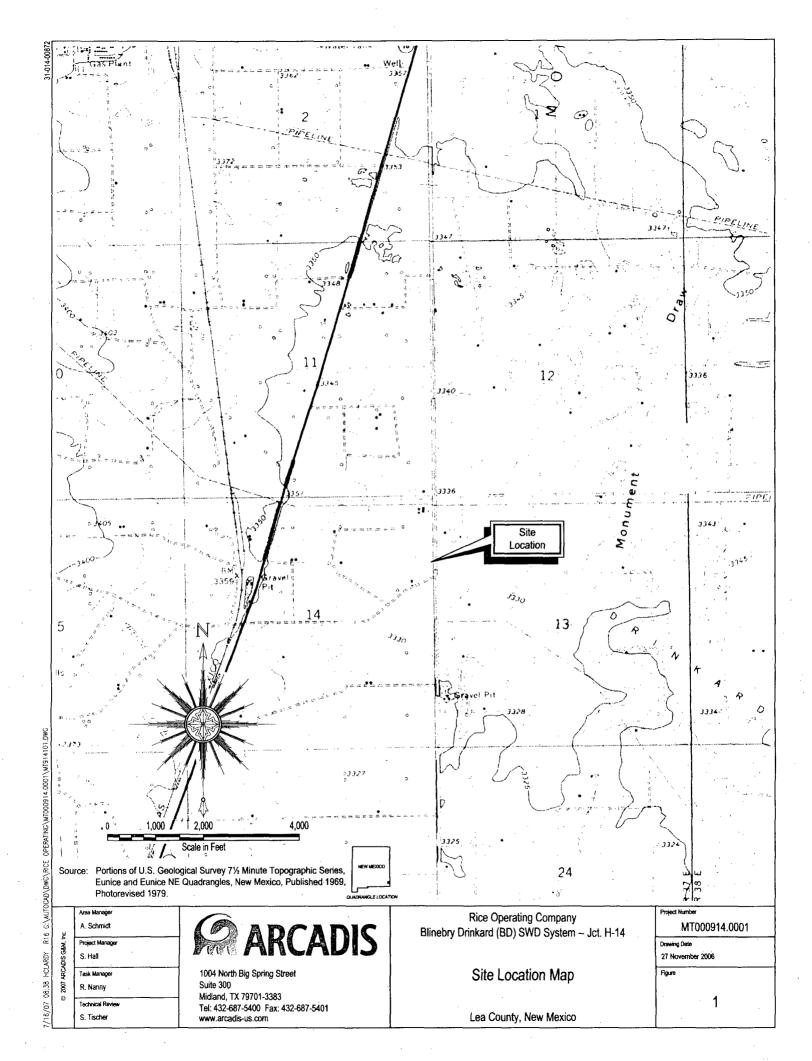
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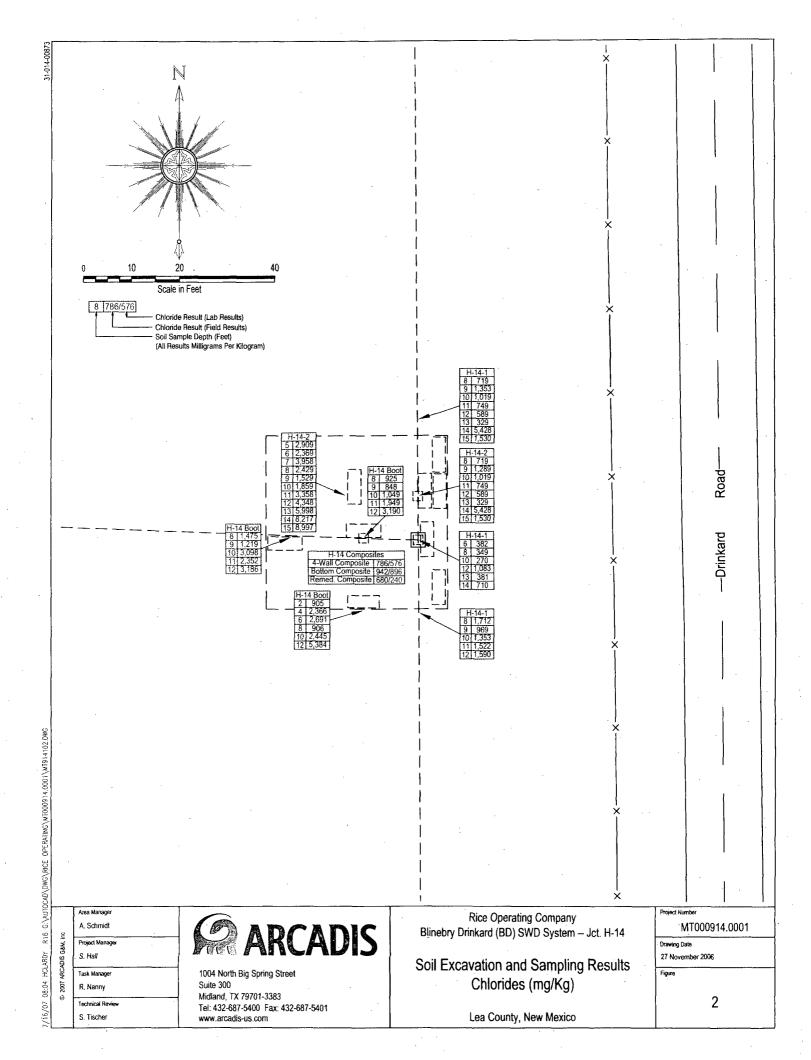
Excavation trench to 12 ft BGS



fence







#### RICE OPERATING COMPANY JUNCTION BOX DISCLOSURE REPORT

BOX LOCATION												
	SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COL	INTY		IMENSIONS -		
	BD	H-14-1	н	14	228	37E	L	ea	Length 10	Width 10	De	
		<u></u>		<u> </u>	L	L			10			
	LAND TYPE:	BLM	STATE	FEE LA	NDOWNER	Leo	V. Sir	ns	OTHER			
	Depth to Grou	ndwater	65	feet	NMOCE	SITE ASSI	ESSM	ENT F	RANKING S	CORE:	20	) *
	Date Started	5/17	/2004	Date Cor	mpleted	6/8/2004	(	OCD V	Vitness	N	0	
	Soil Excavated	304	cubic yaı	ds Exc	avation Le	ength 38		Width	36	Depth	6_	feet
	Soil Disposed	0	cubic yai	rds Off	fsite Facility	n	/a		Location		n/a	
											ft	
Ρ	Procure 5-point composite sample of bottom and 4-point composite sample of sidewalls. TPH and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines.											
	Sample	PID	G	RO	DRO	Chloride		LC	CATION	DEPTH (	ft)	ppm
	Location	ppm	1	/kg	mg/kg	mg/kg	i		Vertical	. 6		382
	SIDEWALLS	6.7	<1	0.0	<10.0	576			at source	8		349
	ВОТТОМ	0.1		0.0	<10.0	896				10		270
F	REMEDIATED	5.2	<1	0.0	<10.0	240				12	L	1083
			•					<u> </u>	<del>-,</del> -	13		381
_									5 ft South	14		710
Ge	General Description of Remedial Action: This junction was the main-line box									8		1712
of a	three-box cluster i	n close proxim	ity. Delineatio	n trenches we	re made with a	a backhoe				9	_	969
o 1	2 ft as chloride field	d tests and PID	) field screenir	gs were cond	ucted at regula	ar intervals.				10		1353
Chl	oride concentration	s did not exhib	it a trend of de	cline with der	oth or breadth y	within the				11		1522
	Chloride concentrations did not exhibit a trend of decline with depth or breadth within the excavation. PID readings were minimal and lab results confirmed TPH concentrations well									12		1590
								<u> </u>	· · · · · · · · · · · · · · · · · ·			<del>.</del>
oelo	w NMOCD guideli	nes. A compa	cted clay barri	er was installe	d in the 38 x 3	6 x 6-ft-deep		<u> </u>	5 ft North	8		71.9
exc	avation and the exc	cavated soil wa	as blended and	backfilled on	top of the clay	/ (see diagram	<u>).                                    </u>			9		1289
٩n	identification plate	was set on the	surface to ma	rk the site for	future conside	rations and to				10		1019
dentify the clay below. A new watertight junction box has been rebuilt at this location.										11		749
The disturbed surface has been seeded with a blend of native vegetation and will be										12		589
		-	<del></del>		-							
monitored for growth.								<u> </u>		13		329
										14		5428
	ADDIT	LIONAL E	VALUATION	on is <u>hig</u>	<u>H</u> PRIOR	RITY				15	_	1530
								4-	wall comp.	n/a		786
* Windmill located 570 ft south of the location.									ttom comp.	6		942
enc	enclosures: chloride graphs, photos, lab results, clay test, PID field screenings, diagrams								ned. comp.	n/a		680
	I HEREB E SUPERVISOR PORT ASSEMBLE		atts	KNC	WLEDGE A	AND BELIEF	=. 	C(	OMPANY	RICE Operat		
\C					<b>-</b> .							
	DATE 7/19/2004 TITLE Project Scientist											

<sup>\*</sup> This site is a "DISCLOSURE." It will be placed on a prioritized list of similar sites for further consideration.

# RICE OPERATING COMPANY JUNCTION BOX DISCLOSURE REPORT

SWD SYSTEM				BOX LOC					
, ,	JUNCTION	TIMU	SECTION	TOWNSHIP	RANGE	COUNTY	BOX [	IMENSIONS -	Depth
BD	H-14-2	Н	14	22S	37E	Lea		eliminated	,
		<u> </u>					· · · · · · · · · · · · · · · · · · ·		
LAND TYPE: B	BLM	STATE	FEE L/	ANDOWNER	Leo	V. Sims	OTHER		<u> </u>
Depth to Groun	dwater	65	feet	NMOCE	SITE ASSE	ESSMENT	RANKING S	CORE:	20 *
Date Started	5/17/2	2004	_ Date Co	mpleted	6/8/2004	OCD	Witness	. N	<u> </u>
Soil Excavated	304	cubic ya	rds Ex	cavation Le	ngth38		h <u>36</u>	Depth	6 fee
Soil Disposed	0	cubic ya	rds O	ffsite Facility	n,	'a	Location		n/a
FINAL ANALY	TICAL RI	ESULTS	S: Samo	le Date	5/21/20	004	Sample De	epth	6 ft
	,,,,,,,		· · · · · · · · · · · · · · · · · · ·						
Procure 5-point co sidewalls. TPH	and Chloride	e laborator	y test result	ts completed	l by u <mark>si</mark> ng ar		CHLOR	IDE FIELD	TESTS
approved lab	and testing	procedures	s pursuant i	to NIVIOCE g	juideiines.				
Sample	PID	G	RO	<u>DRO</u>	Chloride		OCATION	DEPTH (f	ppm.
Location	ppm	mg	3/kg	mg/kg	mg/kg		Vertical	8	719
SIDEWALLS	6.7	<1	0.0	<10.0	<b>5</b> 76		at source	9	1289
BOTTOM	0.1	<1	0.0	· <10.0 <sub>.</sub>	<b>8</b> 96			10	1019
REMEDIATED	5.2	<1	0.0	<10.0	240			11	749
		•						12	589
								13	329
0									
General Description	of Remedia	al Action:	This junction	ı was one				14	5428
·					a backhoe			14 15	5428 1530
of a three-box cluster in	close proximi	ty. Delineation	on trenches w	vere made with			15 ft West		
of a three-box cluster in o 12 ft as chloride field	close proximi tests and PID	ty. Delineation	on trenches v	vere made with	lar intervals.		15 ft West	15	1530
of a three-box cluster in to 12 ft as chloride field Chloride concentrations	close proximi tests and PID did not exhibi	ty. Delineation field screen.	on trenches with de	vere made with ducted at regul apth or breadth	lar intervals.		15 ft West	15 5	1530 2909
of a three-box cluster in o 12 ft as chloride field Chloride concentrations excavation. PID reading	tests and PID did not exhibi	ty. Delineation field screen. It a trend of display and lab re	on trenches with decline with d	vere made with iducted at regul apth or breadth ed TPH concen	lar intervals. within the		15 ft West	15 5 6	1530 2909 2369
of a three-box cluster in o 12 ft as chloride field Chloride concentrations excavation. PID reading below NMQCD guideline	tests and PID did not exhibit gs were minimes. A compac	ty. Defineation field screening t a trend of digital and lab re- ted clay barri	on trenches with decline with decline with decline with decline with decline with decline was installed.	vere made with ducted at regul epth or breadth ed TPH concented in the 38 x 3	lar intervals. within the itrations well 36 x 6-ft-deep		15 ft West	15 5 6 7	1530 2909 2369 3958
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of a three-box cluster in to 12 ft as chloride field. Chloride concentrations excavation. PID reading pelow NMOCD guideline excavation and the excavation and the excavation plate with the clay below. The disturbed surface h	tests and PID did not exhibited as A compact avated soil was set on the tribited at the control of the control	ty. Delineation field screen, the tend of displayed and lab reted clay barries blended an surface to make been elineative.	on trenches wings were con- lectine with de- sults confirmation was installed to depend the backfilled of ark the site for minated an re-	vere made with iducted at regule pith or breadth ed TPH concented in the 38 x on top of the claim future considerable straight.	lar intervals. within the intrations well 36 x 6-ft-deep y (see diagram erations and to	1).		15 5 6 7 8 9 10	1530 2909 2369 3958 2429 1529 1859 3358
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<sup>\*</sup> This site is a "DISCLOSURE." It will be placed on a prioritized list of similar sites for further consideration.

## RICE OPERATING COMPANY JUNCTION BOX DISCLOSURE REPORT

**BOX LOCATION** 

					BOX LOCA					BOX DIMENSIONS - FEET			
	SWD SYSTEM	SWD SYSTEM JUNCTION		UNIT SECTION		TOWNSHIP RANGE		CO	YTNU	BOX D	MENSIONS - Width	FEET Dept	
	BD	H-14 boot	Н	14	22S		37E	L	.ea 📙	Long	eliminated		
		<u>.                                    </u>		<b></b>		i							
	LAND TYPE:	BLM	STATE	FEE	LANDOWNE	R	Leo	V. Si	ms	OTHER			
	Depth to Groun	ndwater	65	feet	имос	DD SIT	E ASSE	SSN	IENT R	ANKING S	CORĘ:	20	·
	Date Started	ate Started 5/17/		Date C	Date Completed		6/8/2004		OCD Witness		No		
	Soil Excavated	304	cubic ya	rds E	excavation	Length	38		Width _	36	Depth	6	feet
	Soil Disposed	0	cubic ya	rds (	Offsite Facili	ty	n/	'a		Location		n/a	
Р	NAL ANALY rocure 5-point c sidewalls. TPH approved lab	omposite sa and Chloric	ample of bot de laborator	tom and o	4-point complet	posite ed by	sample using an	of			pth DE FIELD		
	· ·		<u> </u>	·		· -					<u> </u>		
	Sample	<u>PID</u>	<u>G</u>	<u>RO</u>	<u>DRO</u>		<u>Chloride</u>	].	LO	CATION	DEPTH (f	)	ppm
	Location	ppm		j/kg	ing/kg		mg/kg	_	\	/ertical	8		925
	SIDEWALLS	6.7	· <1	0.0	<10.0		<b>5</b> 76		at	source	9		848
	воттом	0.1	<1	0.0	<10.0		<b>8</b> 96				10		1049
R	EMEDIATED	5.2	<1	0.0	<10.0		240		1		11		1949
											12		3190
	· · · · · · · · · · · · · · · · · · ·	•							15	ft South	2		905
Ge	neral Descriptio	n of Remed	ial Action:	This junction	on contained a	a boot a	nd was				4		2366
one	of a three-box clus	ster in close pr	oximity. Delir	eation tren	ches were ma	de with	a backho	—— е			6		2691
	2 ft as chloride field										8	_	906
	oride concentration										10		2445
						<u> </u>		<del></del>			12		5384
excavation. PID readings were minimal and lab results confirmed TPH concentrations well below NMOCD guidelines. A compacted clay barrier was installed in the 38 x 36 x 6-ft-deep 15 ft West											. 8		1475
									- 10	11 11 0000			1219
An identification plate was set on the surface to mark the site for future considerations and to 10 dentify the clay below. This junction has been eliminated. The disturbed surface has been 11												3098	
						urrace n	as been				11		2352
see	ded with a blend of										12		3186
	ADDII				<u>IGH</u> PRIC	RHY				all comp.	n/a		786
* Windmill located 570 ft south of the location.										om comp.	6		942
enc	losures: chloride gr	raphs, photos,	lab results, c	ay test, PIC	) field screenin	igs, diag	)rams		rem	ed, comp.	n/a		680
				. Kr	ATION ABC VOWLEDGE	E AND	8ELIEF	· .				- id	
SITI	E SUPERVISOR	Joe Ga	ntts	SIGNATU	RE		<u></u>	*****	_ co	MPANY	RICE Operati	ng Com	pany
٦EF	PORT ASSEMBLE	D BY	Kristin Farr	is Pope	SIGNA	ATURE.							
	D	ATE	7/19/2	Ĵ04							ientist .		

<sup>\*</sup> This site is a "DISCLOSURE." It will be placed on a prioritized list of similar sites for further consideration.