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WORKPLANS

DATE: - 3-0

L. Peter Galusky, Jr. Ph.D., P.G.

Texerra

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June 3rd, 2008

Mr. Edward Hansen

New Mexico Energy, Minerals, & Natural Resources Oil Conservation Division, Environmental Bureau 1220 S. St. Francis Drive Santa Fe, New Mexico 87504

RE: Investigation and Characterization Plan Rice Operating Company – EME SWD System BD Oxy Owen "A" and BD P-35-1 Jct / R426-150

Sent via E-mail & U.S. Certified Mail w/ Return Receipt 7007 0710 0003 0305 3927

Dear Mr. Hansen:

RICE Operating Company (ROC) has retained Texerra to address potential environmental concerns at the <u>two</u> above-referenced sites located in the BD SWD system. ROC is the service provider (agent) for the EME 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 would be greatly appreciated.

For all such 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 generally have three submissions, as described below:

- 1. This <u>Investigation and Characterization Plan</u> (ICP) is proposed 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) if this is warranted.
- 3. Finally, after implementing the remedy, a <u>Closure Report</u> with final documentation will be submitted.

This ICP is intended to encompass two nearby sites within the BD SWD system, where the proposed scopes of work are tailored to the respective projects.

BD Oxy Owen "A"

Background and Previous Work

The site is located approximately one mile east/southeast of Eunice, New Mexico (Figure 1). The topography is gently sloping toward the southeast. Soils on the site are mapped in the Lea County Soil Survey as belonging to the Berino-Cacique association, which are characterized as nearly level and gently sloping, sandy soils that are deep and moderately deep to soft or indurated caliche. NM OSE records indicate that groundwater is likely to be encountered at a depth of 50+/- feet in unconsolidated Tertiary alluvium of the Ogallala Formation.

ROC removed three junction boxes from this site, all located within close proximity of each other, in March of 2006 as part of its facility maintenance and upgrade program. (See Figure 2: Rice Junction Box Disclosure Report). The wood junction boxes were removed and soils were sampled using a backhoe, creating a 45 by 35 by 12 ft deep excavation. The excavation bottom and sidewalls were sampled for chlorides and petroleum hydrocarbons, and the excavated soil was then backfilled to ground level.

Significant concentrations (approx. 4,000 +/- ppm) of total hydrocarbons were encountered in the excavated soil with a lower concentration found (394 ppm) at 12 ft below ground surface (bgs). Chloride concentrations were 818 ppm at the bottom of the excavation. <u>Petroleum hydrocarbons</u> and <u>chlorides</u> thus represent the <u>constituents of concern</u>. The surface (ecological) impact of this release was relatively small.

ROC proposes additional investigative work, as outlined below, to more definitively evaluate the extent of residual petroleum hydrocarbons and chlorides, and to then evaluate the potential for groundwater degradation. Yet, it should be noted that the source of this impact is historical. There is no longer a threat of continued, compounded impact at this site as the former junction box has been removed and a clay barrier installed to impeded downward migration of potential contaminants.

Proposed Work Elements

- 1. Summarize information and data collected by ROC to date.
- 2. Summarize additional, publicly available regional and local hydrological information.
- Conduct vertical and lateral delineation of soil <u>chlorides</u> and <u>petroleum hydrocarbons</u>. If warranted, install one or more monitor wells to provide a direct measurement of potential groundwater impact. [All monitoring wells will be constructed per NM Dept. Environment standards].
- 4. Evaluate the risk of groundwater impact in light of the information obtained.

If the evaluation demonstrates that residual constituents pose no threat to ground water quality, then only a surface restoration plan will be proposed to OCD. If this work indicates that there is a present or future risk of impacting groundwater quality from past operations at this location, then a corrective action plan (CAP) will be developed and proposed to OCD.

Rice Operating Company – BD SWD System





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Figure 2 - Owen Oxy A Junction Box Disclosure Report

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BD P-35-1 Jct

Background and Previous Work

The site is located approximately one mile east/southeast of Eunice, New Mexico (Figure 1). The topography is gently sloping toward the southeast. Soils on the site are mapped in the Lea County Soil Survey as belonging to the Berino-Cacique association, which are characterized as nearly level and gently sloping, sandy soils that are deep and moderately deep to soft or indurated caliche. NM OSE records indicate that groundwater is likely to be encountered at a depth of 50+/- feet in unconsolidated Tertiary alluvium of the Ogallala Formation.

ROC removed a wooden junction box at this location, replacing it with a new, water-tight junction box (located approx. 33 ft southwest of the original location) in May of 2006 as part of its facility maintenance and upgrade program. (See Figure 4: Rice Junction Box Disclosure Report). As the original wood junction box was removed soils were sampled using a backhoe, creating a 30 by 25 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.

Low concentrations (30 ppm) of petroleum hydrocarbons (TPH) were encountered in the excavated soil. TPH concentrations were below detection (< 10.0 ppm) in the sidewalls and bottom of the excavation. Petroleum hydrocarbons were therefore ruled out as a potential constituent of concern. In contrast, chloride concentrations increased with depth to 2,185 ppm at 12 ft below ground surface. The surface (ecological) impact of this release was relatively small.

ROC proposes additional investigative work, as outlined below, to more definitively evaluate the extent of residual chlorides (the constituent of concern), and to then evaluate the potential for groundwater degradation. Yet, it should be noted that the source of this impact is historical. There is no longer a threat of continued, compounded impact at this site as the former junction box has been removed.

Proposed Work Elements

- 1. Summarize information and data collected by ROC to date.
- 2. Summarize additional, publicly available regional and local hydrological information.
- Conduct vertical and lateral delineation of soil <u>chlorides</u>. If warranted, install one or more monitor wells to provide a direct measurement of potential groundwater impact. [All monitoring wells will be constructed per NM Dept. Environment standards].
- 4. Evaluate the risk of groundwater impact in light of the information obtained.

If the evaluation demonstrates that residual constituents pose no threat to ground water quality, then only a surface restoration plan will be proposed to OCD. If this work indicates that there is a present or future risk of impacting groundwater quality from past operations at this location, then a corrective action plan (CAP) will be developed and proposed to OCD.

Rice Operating Company – BD SWD System



Figure 3 – BD P-35-1 Jct location on USGS 1:100,000 topographic base map.

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Rice Operating Company – BD SWD System

I appreciate the opportunity to work with you and your staff on these projects. Please call either myself, at the number below, or Marvin Burrows (ROC) at 505-393-9174, if you have any questions or wish to discuss these matters.

Thank you for your consideration.

Sincerely,

L. Peter (**Pete**) Galusky, Jr. Ph.D., P.G. *Principal*

Texerra

505 N. Big Spring, Suite 404 Midland, Texas 70701 Tel: 432-634-9257 E-mail: <u>lpg@texerra.com</u> Web site: www.texerra.com

cc: Rice Operating Company

Attachments: Site Maps, Junction Box Disclosure Reports as noted