

1R - 27

REPORTS

DATE:

8-20-10



CERTIFIED MAIL
RETURN RECEIPT NO. 7010 0290 0003 1264 8980

August 20, 2010

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: Corrective Action Report and Termination Request
BD Jct. A-27 Release (1R-27)
T22S-R37E-Section 27, Unit Letter A
Lea County, New Mexico**

Mr. Hansen:

As agent for Rice Operating Company (ROC), Trident Environmental submits the following update of the completed corrective actions performed at the above-referenced site and a request for termination. This request documents the completion of corrective actions which were performed in accordance with the NMOCD-approved *Corrective Action Plan* (May 24, 2006) and *Addendum* (May 27, 2010).

On June 10, 2010, ROC completed soil boring SB-9, located between SB-5 and SB-7. The boring was completed to a depth of 30-ft below ground surface (bgs) and confirms that the criteria for chloride delineation have been met in which three consecutive samples showed a decreasing chloride concentration with depth and the last sample at 30-ft bgs having a chloride concentration of 151 mg/kg based on field titration. Laboratory analysis confirmed the 30 ft sample at 32 mg/kg. Photographic documentation of this activity, a lithologic log with chloride concentration data, and the laboratory analytical report are included in Attachment A.

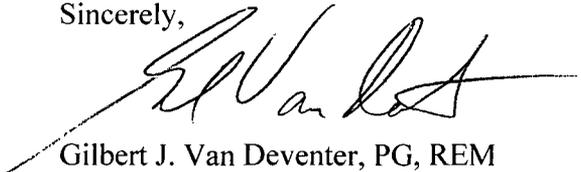
On August 4, 2010, ROC began remediation of the surface water management areas by excavating the three areas to approximately 1.5 ft bgs. The three areas were then scraped and contoured resulting in the east area measuring 480 sq ft, the middle area measuring 150 sq ft., and the west area measuring 312 sq ft. Four loads (48 yd³) were hauled to an OCD-permitted landfarm facility (Sundance Services, Inc.). The three areas were finished by removing rocks and re-seeding of the finished areas was completed on August 12, 2010. Photographic documentation of this activity and a copy of the OCD-approved *Corrective Action Plan Addendum* are included in Attachment B.

ROC is the service provider (agent) for the BD SWD System and has no ownership of any portion of pipeline, well, or facility. The BD SWD System is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis.

ROC has met all abatement requirements in accordance with 19.15.29 NMAC, and respectfully requests termination of the regulatory file for this site.

Thank you for your consideration concerning this request for site termination. If you have any questions, please call Hack Conder at (575) 393-9174.

Sincerely,



Gilbert J. Van Deventer, PG, REM
Trident Environmental

cc: Hack Conder (ROC)

ATTACHMENT A

Soil Boring SB-9

- Photographic Documentation
- Lithologic Log
- Laboratory Analytical Report

BD A-27 leak



drilling SB-9



SB-9 in relation to the high line wires

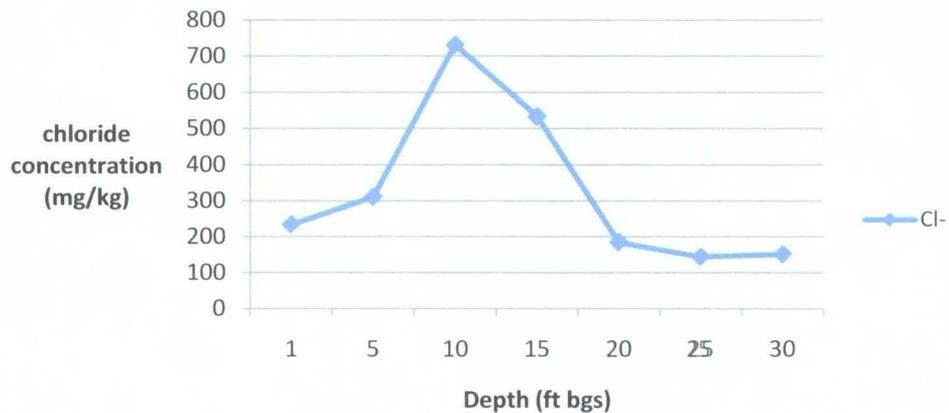


plugging SB-9 in total with bentonite



SB-9 complete

Chloride concentration versus depth



From: [Hack Conder](#)
To: [Edward J. EMNRD Hansen](#)
Cc: [Katie Jones](#)
Subject: NMOCD 1R-27 (BD A-27 addendum2)
Date: Thursday, May 27, 2010 3:10:44 PM
Attachments: [figure eight.jpg](#)

Mr. Hansen

I am requesting a addendum to the Corrective action Plan for NMOCD 1R-27 (BD A-27) dated May 24, 2006. I would like to include in paragraph two under section Recommendation for Corrective Actions the following.

Perform surface water management in three areas identified on attached figure eight(1 to 2 feet burmed areas) .Drill one confirmatory boring between soil bore 5 and soil bore 7 to minimum depth of 30 feet also shown in figure eight . The criteria to delineate in the soil boring is after three consecutive samples showing a decreasing trend of chloride (Samples taken in 5 feet intervals) and the last sample shows chloride < 250 ppm.

If you have any questions or concerns please contact me.

Hack Conder
Environmental Manager
Rice Operating Company
575-393-9174
fax 575-397-1471

ATTACHMENT B

Surface Water Management Areas

- Photographic Documentation
- Corrective Action Plan Amendment

BD A-27 leak (1R27)



scraping the surface water management areas



digging the surface water management areas



removing rocks



middle surface water management area complete



east surface water management area complete



west surface water management area complete



seeding the site

08/12/2010



raking in seed

08/12/2010



122 W. Taylor
 Hobbs, NM 88240
 Phone (575) 393-9174
 Fax (575) 397-1471

BD A-27 leak

Legals: UL/A sec. 27 T22S R37E
 NMOCD Case #: 1R27
 Owner: I. Boyd

-  Leak extent
-  Surface water management areas
-  Current watertight junction box
-  Proposed soil bore
-  Soil bores

Drawing date 5-26-2010
 Revision date
 Drafted by Lara Weinheimer



figure eight.jpg	Content-Description: figure eight.jpg
	Content-Type: image/jpeg
	Content-Encoding: base64

Hansen, Edward J., EMNRD

From: Katie Jones [kjones@riceswd.com]
Sent: Tuesday, August 24, 2010 2:37 PM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder
Subject: BD A-27 (1R27) CAP Report and Termination Request Additional Information

Mr. Hansen,

Between August 30-31, 2005, SB-1 through SB-8 were drilled at BD A-27 leak (1R27). Upon completion, each soil bore was plugged with bentonite (photo documentation is included below). If you have any questions or require any additional information, please contact Hack Conder at (575)631-6432.



Thank you.

Katie Jones
Environmental Project Coordinator
RICE Operating Company