

1R - 427-156

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, July 25, 2013 3:28 PM
To: Hack Conder (hconder@riceswd.com)
Cc: Leking, Geoffrey R, EMNRD; Laura Pena (lpena@riceswd.com); Katie Jones <kjones@riceswd.com> (kjones@riceswd.com); Scott Curtis (scurtis@riceswd.com)
Subject: Remediation Plan (1R427-156) Termination - ROC EME U-6-2 Vent Site

**RE: Termination Request
for the Rice Operating Company's
EME U-6-2 Vent Site
Unit Letter U, Section 6, T21S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-156) Termination**

Dear Mr. Conder:

The New Mexico Oil Conservation Division (OCD) has received Rice Operating Company's report and request to close the above-referenced site, dated July 19, 2013 (received July 24, 2013). The report is acceptable to the OCD.

The above-referenced report, submitted in accordance with 19.15.29 NMAC (Rule 29; formally, Rule 116), indicates that Rice Operating Company has met the requirements of 19.15.29 NMAC; therefore, the OCD approves the report and hereby notifies you that the remediation plan (1R427-156) is terminated in accordance with 19.15.29 NMAC.

Please be advised that OCD approval of this report does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have any questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

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 8906

RECEIVED

JUL 24 2013

July 19, 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

Oil Conservation Division

1220 S. St. Francis Drive

Santa Fe, NM 87505

RE: Termination Request

EME U-6-2 vent (1R427-156): UL/U, Sec. 6, T21S, R36E

RICE Operating Company – Eunice Monument Eumont (EME) SWD System

Mr. Hansen:

Rice Operating Company (ROC) is the service provider (agent) for the EME 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 and Previous Work

In 2004, ROC initiated work on the former EME U-6-2 vent junction box. The site is located in UL U, Sec. 6, T21S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 140 +/- feet. The site was delineated using a backhoe to form a 4x10x12 ft deep excavation and soil samples were screened at regular intervals for both hydrocarbons and chlorides. Each sample was field titrated for chlorides and screened for TPH, resulting in low concentrations for chlorides and TPH. The 12 ft sample was sent to a commercial laboratory for analysis, resulting in a chloride, gasoline range organics (GRO) and a diesel range organics (DRO) concentration below detectable limits. The excavation was backfilled with the excavated soil to ground surface and contoured to the surrounding area. On 9/23/2004, the site was seeded with a blend of native vegetation. Vegetation has rebounded at this site; vegetation will act as an evapo-transpiration barrier that will also inhibit the downward migration of chlorides and hydrocarbons. Plants capture water through their roots and so reduce the amount of water infiltrating below the root zone. A junction box is no longer needed at this site.

The junction box site location map, area map, final report, PID sheet, laboratory analysis and current photodocumentation are attached.

Recommendations

Site investigation demonstrates that residual chloride and hydrocarbons in the vadose zone will not with reasonable probability contaminate groundwater in excess of NMOCD standards. This site meets the requirements of the NMOCD-approved Revised Junction Box Upgrade Work Plan (July 16, 2003). As such, ROC request termination of the regulatory file, or similar closure status.

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

A handwritten signature in black ink, appearing to read 'H. Conder', with a stylized flourish at the end.

Hack Conder
Environmental Manager

enclosures

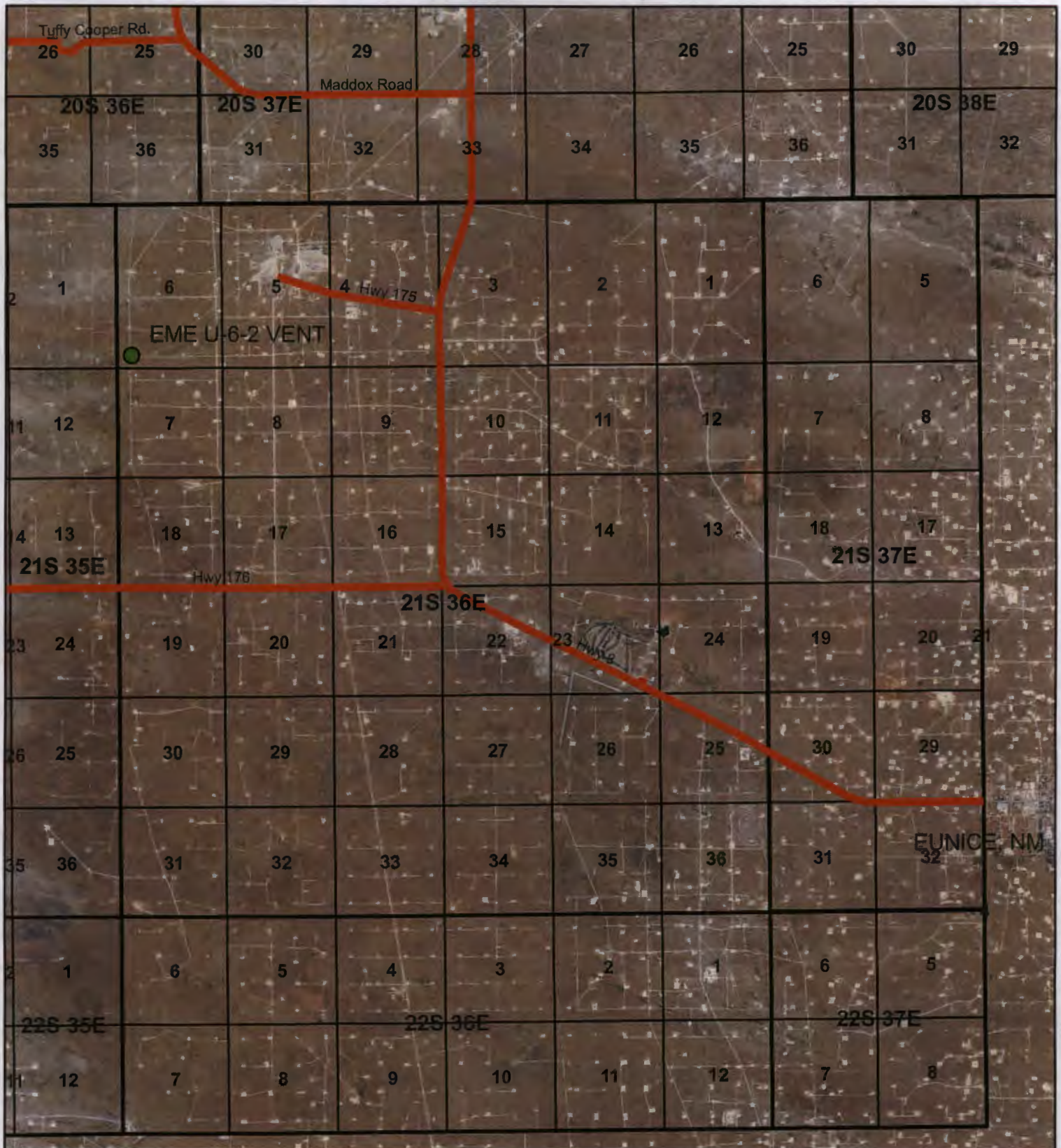
RECEIVED OGD
2013 JUL 24 P 2:25



Site Maps

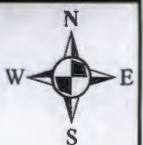
RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471

Site Location Map



EME U-6-2 VENT

UL U SECTION 6
T-21-S R-36-E
LEA COUNTY, NM



0 1 2
Miles

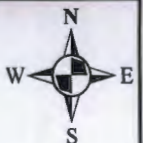
Drawing date: 7/17/13
Drafted by: T. Grieco

Geographical Location Map



EME U-6-2 VENT

UL U SECTION 6
T-21-S R-36-E
LEA COUNTY, NM



0 1,000 2,000
Feet

Drawing date: 7/17/13
Drafted by: T. Grieco



Junction Box Report

RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
EME	U-6-2 vent	UNIT	6	21S	36E	Lea	Length	Width	Depth
							no box-junction eliminated		

LAND TYPE: BLM _____ STATE X FEE LANDOWNER _____ OTHER _____

Depth to Groundwater 140 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 9/14/2004 Date Completed 9/23/2004 OCD Witness No

Soil Excavated 18 cubic yards Excavation Length 4 Width 10 Depth 12 feet

Soil Disposed 0 cubic yards Offsite Facility n/a Location n/a

FINAL ANALYTICAL RESULTS: Sample Date 9/14/2004 Sample Depth 12 ft

TPH and chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines.

CHLORIDE FIELD TESTS

Sample Location	PID ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
VERTICAL GRAB @ 12 ft BGS	1.0	<10.0	<10.0	<20

LOCATION	DEPTH (ft)	ppm
Vertical delineation trench at junction	4	239
	6	120
	8	89
	10	89
	12	89
background	0.5	142

General Description of Remedial Action: This junction box contained a vent and exhibited no visible indications of hydrocarbon or chloride impact. The box was surrounded by healthy native vegetation. The junction was eliminated with the pipeline replacement project. The box lumber was removed and the site was delineated using a backhoe while PID field screenings and chloride field tests were conducted every 2 ft down to 12 ft BGS. PID readings were low and TPH lab results confirmed concentrations well below NMOCD guidelines. Chloride concentrations were very low and no further excavation was warranted. The excavated soil was blended and backfilled into the hole. The disturbed surface was seeded with a blend of native vegetation on 9/23/2004 and is expected to return to productive capacity at a normal rate.

enclosures: chloride graph, photos, lab results, PID field screenings

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

SITE SUPERVISOR Rob Elam SIGNATURE not available COMPANY Curt's Environmental—Odessa, Texas

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE Kristin Farris Pope

DATE 10/20/2004 TITLE Project Scientist

RICE OPERATING COMPANY

122 WEST TAYLOR

HOBBS, NEW MEXICO 88240

PHONE: (505) 393-9174 FAX: (505) 397-1471

VOC FIELD TEST REPORT FORM

MINI RAE PLUS CLASSIC PHOTOIONIZATION GAS DETECTOR

MODEL NO: PGM 761S

CALIBRATION GAS

GAS COMPOSITION: ISOBUTYLENE

AIR

LOT NO: 03-2475EXP. DATE: 10-19-04

METER READING

ACCURACY: 100.0104550
SERIAL NO: ~~104412~~

100 PPM

BALANCE

FILL DATE: 4-19-04ACCURACY: ± 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
EME	Vent U-6-2	u	6	21	36

SAMPLE	PID RESULT	SAMPLE	PID RESULT
Source 4'	11.3		
6'	18.8		
8'	4.6		
10'	1.9		
12'	1.0		

I certify that I have calibrated the above instrument in accordance to the manufacture operation manual.



Signature

Title

9-14-04

Date



Analytical Report

Prepared for:

Roy Rascon
Rice Operating Co.
122 W. Taylor
Hobbs, NM 88240

Project: EME Vent U-6-2
Project Number: None Given
Location: RRR

Lab Order Number: 4116006

Report Date: 09/22/04

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: EME Vent U-6-2
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
09/22/04 10:00

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
12' Source	4116006-01	Solid	09/14/04 15:20	09/16/04 08:00

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: EME Vent U-6-2
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
09/22/04 10:00

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
12' Source (4H6006-01) Solid									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EI41719	09/17/04	09/19/04	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		91.8 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		92.4 %	70-130		"	"	"	"	

Environmental Lab of Texas

The results in this report apply to the samples analyzed in accordance with the samples received in the laboratory. This analytical report must be reproduced in its entirety, with written approval of Environmental Lab of Texas.

Page 2 of 7

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: EME Vent U-6-2
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
09/22/04 10:00

General Chemistry Parameters by EPA / Standard Methods
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
12' Source (4116006-01) Solid									
Chloride	ND	20.0	mg/kg Wet	2	EI42112	09/16/04	09/21/04	SW 846 9253	
% Solids	94.0		%	1	EI41707	09/16/04	09/16/04	% calculation	

Environmental Lab of Texas

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Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: EME Vent U-6-2
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
09/22/04 10:00

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EI41719 - Solvent Extraction (GC)										
Blank (EI41719-BLK1) Prepared: 09/17/04 Analyzed: 09/19/04										
Gasoline Range Organics C6-C12	ND	10.0	mg/kg wet							
Diesel Range Organics >C12-C35	ND	10.0	"							
Total Hydrocarbon C6-C35	ND	10.0	"							
Surrogate: 1-Chlorooctane	44.2		mg/kg	50.0		88.4	70-130			
Surrogate: 1-Chlorooctadecane	41.8		"	50.0		83.6	70-130			
Blank (EI41719-BLK2) Prepared: 09/17/04 Analyzed: 09/19/04										
Gasoline Range Organics C6-C12	ND	10.0	mg/kg wet							
Diesel Range Organics >C12-C35	ND	10.0	"							
Total Hydrocarbon C6-C35	ND	10.0	"							
Surrogate: 1-Chlorooctane	48.3		mg/kg	50.0		96.6	70-130			
Surrogate: 1-Chlorooctadecane	36.3		"	50.0		72.6	70-130			
LCS (EI41719-BS1) Prepared: 09/17/04 Analyzed: 09/19/04										
Gasoline Range Organics C6-C12	426	10.0	mg/kg wet	500		85.2	75-125			
Diesel Range Organics >C12-C35	498	10.0	"	500		99.6	75-125			
Total Hydrocarbon C6-C35	924	10.0	"	1000		92.4	75-125			
Surrogate: 1-Chlorooctane	51.3		mg/kg	50.0		103	70-130			
Surrogate: 1-Chlorooctadecane	56.4		"	50.0		113	70-130			
LCS (EI41719-BS2) Prepared: 09/17/04 Analyzed: 09/19/04										
Gasoline Range Organics C6-C12	415	10.0	mg/kg wet	500		83.0	75-125			
Diesel Range Organics >C12-C35	505	10.0	"	500		101	75-125			
Total Hydrocarbon C6-C35	920	10.0	"	1000		92.0	75-125			
Surrogate: 1-Chlorooctane	54.0		mg/kg	50.0		108	70-130			
Surrogate: 1-Chlorooctadecane	44.3		"	50.0		88.6	70-130			
Calibration Check (EI41719-CCV1) Prepared: 09/17/04 Analyzed: 09/19/04										
Gasoline Range Organics C6-C12	425		mg/kg	500		85.0	80-120			
Diesel Range Organics >C12-C35	520		"	500		104	80-120			
Total Hydrocarbon C6-C35	945		"	1000		94.5	80-120			
Surrogate: 1-Chlorooctane	52.0		"	50.0		104	70-130			
Surrogate: 1-Chlorooctadecane	47.9		"	50.0		95.8	70-130			

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Page 4 of 7

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: EME Vent U-6-2
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
09/22/04 10:00

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EI41719 - Solvent Extraction (GC)										
Calibration Check (EI41719-CCV2)				Prepared: 09/17/04 Analyzed: 09/19/04						
Gasoline Range Organics C6-C12	427		mg/kg	500		85.4	80-120			
Diesel Range Organics >C12-C35	483		"	500		96.6	80-120			
Total Hydrocarbon C6-C35	910		"	1000		91.0	80-120			
Surrogate: 1-Chlorooctane	51.6		"	50.0		103	70-130			
Surrogate: 1-Chlorooctadecane	47.0		"	50.0		94.0	70-130			
Matrix Spike (EI41719-MS1)				Source: 4I16003-01 Prepared: 09/17/04 Analyzed: 09/19/04						
Gasoline Range Organics C6-C12	469	10.0	mg/kg dry	521	ND	90.0	75-125			
Diesel Range Organics >C12-C35	555	10.0	"	521	ND	107	75-125			
Total Hydrocarbon C6-C35	1020	10.0	"	1040	ND	98.1	75-125			
Surrogate: 1-Chlorooctane	55.9		mg/kg	50.0		112	70-130			
Surrogate: 1-Chlorooctadecane	52.5		"	50.0		105	70-130			
Matrix Spike (EI41719-MS2)				Source: 4I17004-13 Prepared: 09/17/04 Analyzed: 09/19/04						
Gasoline Range Organics C6-C12	506	10.0	mg/kg dry	549	ND	92.2	75-125			
Diesel Range Organics >C12-C35	627	10.0	"	549	15.3	111	75-125			
Total Hydrocarbon C6-C35	1130	10.0	"	1100	15.3	101	75-125			
Surrogate: 1-Chlorooctane	55.1		mg/kg	50.0		110	70-130			
Surrogate: 1-Chlorooctadecane	54.7		"	50.0		109	70-130			
Matrix Spike Dup (EI41719-MSD1)				Source: 4I16003-01 Prepared: 09/17/04 Analyzed: 09/19/04						
Gasoline Range Organics C6-C12	478	10.0	mg/kg dry	521	ND	91.7	75-125	1.90	20	
Diesel Range Organics >C12-C35	577	10.0	"	521	ND	111	75-125	3.89	20	
Total Hydrocarbon C6-C35	1060	10.0	"	1040	ND	102	75-125	3.85	20	
Surrogate: 1-Chlorooctane	57.5		mg/kg	50.0		115	70-130			
Surrogate: 1-Chlorooctadecane	53.8		"	50.0		108	70-130			
Matrix Spike Dup (EI41719-MSD2)				Source: 4I17004-13 Prepared: 09/17/04 Analyzed: 09/19/04						
Gasoline Range Organics C6-C12	522	10.0	mg/kg dry	549	ND	95.1	75-125	3.11	20	
Diesel Range Organics >C12-C35	630	10.0	"	549	15.3	112	75-125	0.477	20	
Total Hydrocarbon C6-C35	1150	10.0	"	1100	15.3	103	75-125	1.75	20	
Surrogate: 1-Chlorooctane	57.0		mg/kg	50.0		114	70-130			
Surrogate: 1-Chlorooctadecane	57.5		"	50.0		115	70-130			

Environmental Lab of Texas

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Page 5 of 7

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: EME Vent U-6-2
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
09/22/04 10:00

General Chemistry Parameters by EPA / Standard Methods - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EI41707 - % Solids										
Blank (EI41707-BLK1)				Prepared & Analyzed: 09/16/04						
% Solids	100		%							
Duplicate (EI41707-DUP1)				Source: 4I15011-01		Prepared & Analyzed: 09/16/04				
% Solids	100		%		100			0.00	20	
Batch EI42112 - Water Extraction										
Blank (EI42112-BLK1)				Prepared: 09/16/04 Analyzed: 09/21/04						
Chloride	ND	20.0	mg/kg Wet							
Matrix Spike (EI42112-MS1)				Source: 4I16001-01		Prepared: 09/16/04 Analyzed: 09/21/04				
Chloride	1300	20.0	mg/kg Wet	500	830	94.0	80-120			
Matrix Spike Dup (EI42112-MSD1)				Source: 4I16001-01		Prepared: 09/16/04 Analyzed: 09/21/04				
Chloride	1300	20.0	mg/kg Wet	500	830	94.0	80-120	0.00	20	
Reference (EI42112-SRM1)				Prepared & Analyzed: 09/21/04						
Chloride	4940		mg/kg	5000		98.8	80-120			

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Page 6 of 7

12600 West I-20 East
Odessa, Texas 79763

Phone: 915-563-1000
Fax: 915-563-1713

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager:

Roy Rascon

Project Name:

EME
Vent U. 6.2

Company Name

RICE Operating

Project #:

Company Address:

122 W. Taylor

Project Loc:

EME RRR

City/State/Zip:

Hobbs, NM '88240

PO #:

Telephone No. _____

(505) 393-9174

Fax No:

(505) 397-1471

Sampler Signature:

Bob Lane

Oct 29 2004 14:13

Environmental Lab of Texa 432-563-1713



Current Photodocumentation

RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471

EME U-6-2 Vent (1R427-156)

UL/U, Section 6, T21S, R36E



Facing east

6/13/2013



Facing West

6/13/2013