

1R - 427-115

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, August 14, 2013 6:05 PM
To: Hack Conder (hconder@riceswd.com)
Cc: Leking, Geoffrey R, EMNRD; Laura Pena (lpna@riceswd.com); Katie Jones <kjones@riceswd.com> (kjones@riceswd.com); Scott Curtis (scurtis@riceswd.com)
Subject: Remediation Plan (1R427-115) Termination - ROC EME U6 Site

**RE: Termination Request
for the Rice Operating Company's
EME U6 Site
Unit Letter U, Section 6, T21S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-115) 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 August 9, 2013 (received August 14, 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 (1R427-115) 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 9361

August 9, 2013

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: Termination Request

EME U6 (1R427-115): 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 2001, ROC initiated work on the former U6 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 157 +/- feet. The site was delineated using a backhoe to form a 12x10x6-ft deep excavation and soil samples were screened at regular intervals for both hydrocarbons and chlorides. Each sample was field titrated for chlorides, resulting in low concentrations. Representative composite samples of the sidewalls and bottom were submitted to a commercial laboratory to be analyzed for chloride, TPH, and BTEX. The sidewall composite resulted in a chloride concentration of 182 mg/kg and concentrations of gasoline range organics (GRO), diesel range organics (DRO) and BTEX below detectable limits. The bottom composite resulted in a chloride concentration of 149 mg/kg and concentrations of GRO, DRO and BTEX below detectable limits. A compacted clay liner was installed and will provide a barrier that will inhibit the downward migration of chlorides to groundwater. The excavation was backfilled to ground surface and contoured to the surrounding area. Vegetation has rebounded at this site so no further action is warranted. Vegetation above the liner will also provide a natural infiltration barrier for the site since plants capture water through their roots thereby reducing the volume of water

RECEIVED OGD
2013 AUG 14 P 2:27

moving through the vadose zone to groundwater. A new, watertight junction box was built over the site location and has since been eliminated.

The junction box site maps, final report, 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)393-2967 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, flowing script.

Hack Conder
Environmental Manager

enclosures

Site Maps

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

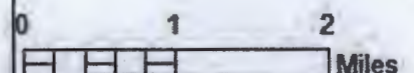
Site Location Map



**EME
U6**

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

CASE # 1R427-115



Drawing date: 7/31/13
Drafted by: T. Grieco

Area Map

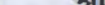


EME
U6

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

CASE #: 1R427-115



0 500 1,000
 Feet

Drawing date: 7/31/13
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

427-115

RICE OPERATING COMPANY JUNCTION BOX FINAL REPORT

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
EME	U6	UNIT	6	21S	36E	LEA	Length 9'	Width 7'	Depth 4'

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

Depth to Groundwater 157 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 01/02/2001 Date Completed 01/02/2001 OCD Witness NO

Soil Excavated 25 cubic yards Excavation Length 12 Width 10 Depth 6 feet

Soil Disposed 0 cubic yards Offsite Facility _____ Location _____

FINAL ANALYTICAL RESULTS: Sample Date 01/02/2001 Sample Depth 6'

Procure 5-point composite sample of bottom and 4-point composite sample of sidewalls. TPH, BTEX and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines.

Sample Location	Benzene mg/kg	Toluene mg/kg	Ethyl Benzene mg/kg	Total Xylenes mg/kg	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SIDEWALLS	<0.002	<0.002	<0.002	<0.006	<50	<50	182
BOTTOM	<0.002	<0.002	<0.002	<0.006	<50	<50	149

General Description of Remedial Action: Delineated vertical and lateral extent to below

NMOCD guidelines. Installed compacted clay liner and water tight junction box and backfilled.

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS	4'	270
BOTTOM	6'	250

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

DATE 01/02/2001 PRINTED NAME James Strugill
SIGNATURE James Strugill TITLE Environmental Technician



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
RICE OPERATING CO.
ATTN: JAMES STURGILL
122 W. TAYLOR
HOBBS, NM 88240
FAX TO:

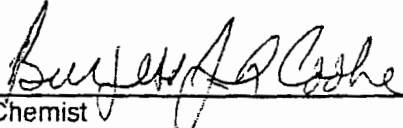
Receiving Date: 01/02/01
Reporting Date: 01/04/01
Project Number: NOT GIVEN
Project Name: U-6 SIDES AND BOTTOM
Project Location: U-SEC6-T21-R36

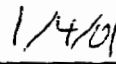
Sampling Date: 01/02/01
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: B C
Analyzed By: BC/AH

LAB NUMBER SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (>C ₁₀ -C ₂₈) (mg/Kg)	CI* (mg/Kg)
	01/03/01	01/03/01	01/04/01
H5486-1 U-6 BOTTOM	<50	<50	149
H5486-2 U-6 SIDES	<50	<50	182
Quality Control	929	1049	1004
True Value QC	1000	1000	1000
% Recovery	92.9	105	100
Relative Percent Difference	8.5	7.8	7.2

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI: Std. Methods 4500-CI'B

*Analyses performed on 1:4 w:v aqueous extracts.


Chemist


Date

H5486A.XLS

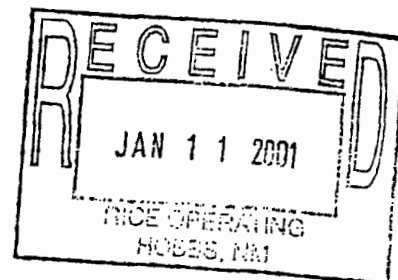
PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240



ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: JAMES STURGILL
122 W. TAYLOR
HOBBS, NM 88240
FAX TO:

Receiving Date: 01/02/01
Reporting Date: 01/05/01
Project Number: U-6 SIDE AND BOTTOM
Project Name: U-6 SIDES AND BOTTOM
Project Location: U-SEC 6 - T-21 R-36

Sampling Date: 01/02/01
Sample Type: SOIL
Sample Condition: COOL, INTACT
Sample Received By: BC-HOBBS
Analyzed By: JA

LAB NUMBER	SAMPLE ID	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE		01/04/01	01/04/01	01/04/01	01/04/01
H5486-1	U-6 BOTTOM	<0.002	<0.002	<0.002	<0.006
H5486-2	U-6 SIDES	<0.002	<0.002	<0.002	<0.006
Quality Control		0.092	0.096	0.087	0.262
True Value QC		0.100	0.100	0.100	0.300
% Accuracy		92	96	87	87
Relative Percent Difference		4.9	2.8	2.4	2.3

METHOD: EPA SW 846-8020, 5030, Gas Chromatography


Chemist

1-5-01
Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.

H5486SHOBBSRICEBTEXONLY



(915) 673-7001 Fax (915) 673-7020 (505) 393-2326 Fax (505) 393-2476

Page of

† Cardinal cannot accept verbal changes. Please fax written changes to 605-393-2476.



Current Photodocumentation

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

EME U6 (1R427-115)
Unit Letter U, Section 6, T21S, R36E



Facing west

7/16/2013



Facing south

7/16/2013