

1R - 427-32

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, February 04, 2013 9:39 AM
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 (1R427-32) Termination - ROC EME O-25 Site

**RE: Termination Request
for the Rice Operating Company's
EME O-25 Site
Unit Letter O, Section 25, T19S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-32) 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 January 25, 2013 (received January 28, 2013). The reports are 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 (1R427-32) 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*

112 West Taylor • Hobbs, New Mexico 88240

Phone: (575) 393-9174 • Fax: (575) 397-1471

RECEIVED OCD

2013 JAN 28 P 1:31

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8784

January 25, 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 O-25 (1R427-32): UL/O Sec. 25, T19S, R36E
RICE Operating Company – Eunice Monument Eumont 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

In 2004, ROC initiated work on the former O-25 junction box. The site is located in UL/O, Sec. 25, T19S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 20 +/- feet but after encountering red bed clay while drilling a source soil bore, it was verified there is no groundwater at this site.

To investigate the depth of chloride presence, a soil bore was initiated on January 13, 2004. The boring was advanced to a total depth of 20 ft BGS with soil samples collected at regular intervals to a depth of 15 ft BGS. The 10 ft sample was taken to a commercial laboratory for analysis of TPH, resulting in a gasoline range organics (GRO) concentration of 75.6 mg/kg and a diesel range organics (DRO) concentration of 707 mg/kg. The 15 ft sample was taken to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 176 mg/kg, a GRO concentration below detectable limits and a DRO concentration of 21.1 mg/kg. The bore hole from 20 – 10 ft BGS was plugged with bentonite and the remainder of the bore hole was plugged with drill cuttings to ground surface. A new, water-tight junction box was previously built over the same location.

The junction box final report, site location maps, photo documentation, soil bore log and laboratory analysis 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 long horizontal flourish extending to the right.

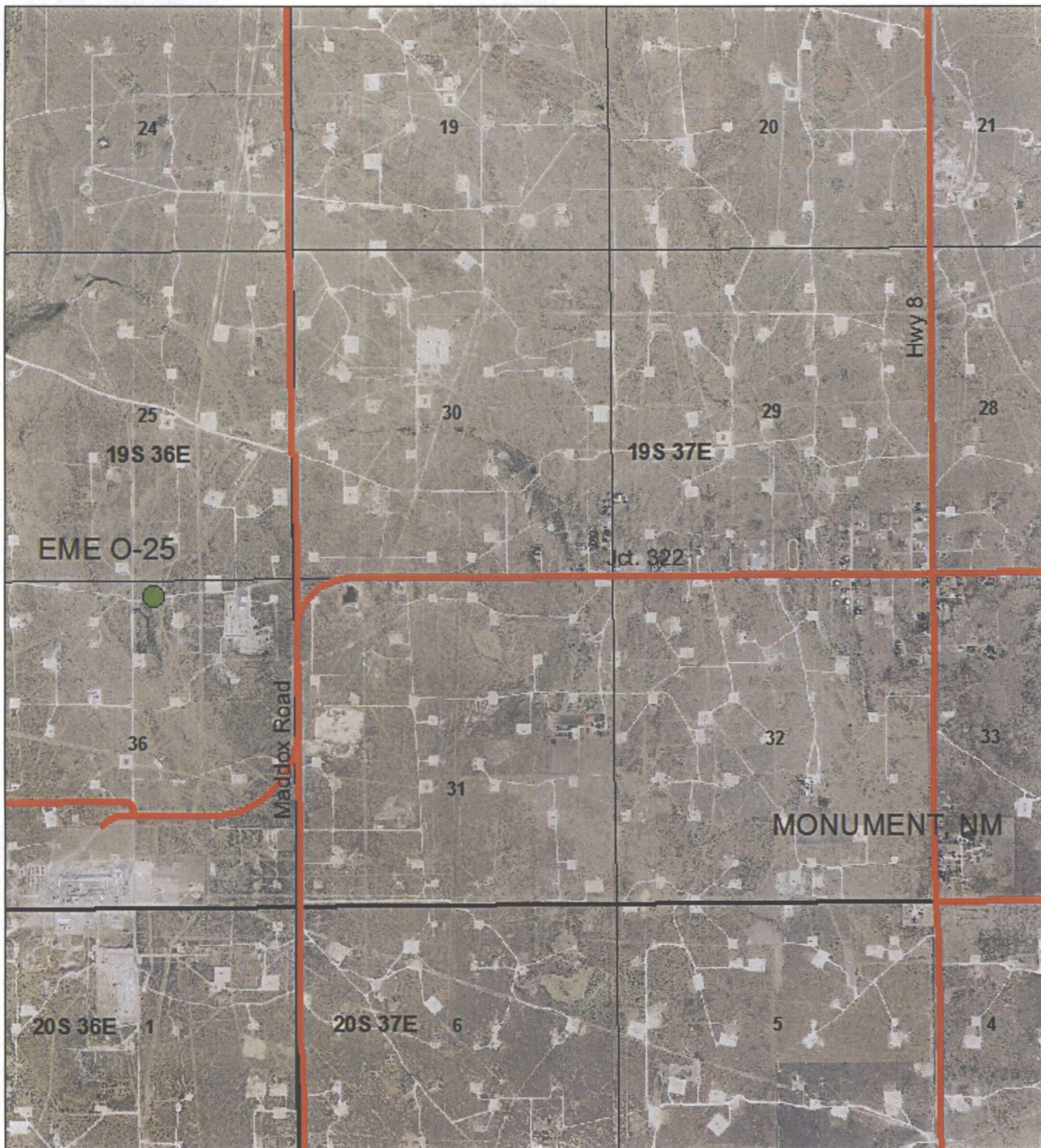
Hack Conder
Environmental Manager

enclosures



Site Location Map

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



**EME
O-25**

**UL O SECTION 25
T-19-S R-36-E
LEA COUNTY, NM**



0 0.25 0.5
Miles

Drawing date: 12/7/12
Drafted by: Tony 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	O-25	O	25	19S	36E	Lea	Length	Width	Depth
							8	6	6

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

Depth to Groundwater none feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 1/13/2004 Date Completed 1/13/2004 OCD Witness No

Soil Excavated soil bore cubic yards Excavation Length n/a Width n/a Depth 20 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 1/13/2004 Sample Depth Soil Bore 10 & 15 ft

Sample Location	PID ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
10 ft	179.0	75.6	707	XXX
15 ft	26.3	<10.0	21.1	176

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

GENERAL DESCRIPTION OF REMEDIAL ACTION: Since the new junction box was already built over the old junction box site, a soil bore was initiated to investigate the vertical extent of impact at the site. Chloride concentrations were found to be minimal but PID readings indicated the presence of volatile compounds. Hydrocarbon product was encountered at 14-16 ft BGS. Although, moisture was present in the 10-20 ft samples, a water-bearing zone was not encountered. At 19 ft, redbed clay was met and the drilling was ceased. 10 and 15 ft samples were taken to a laboratory for analysis. Because there were no significant indications of a water-bearing zone during this soil bore, ROC concludes that there is no groundwater at this location. A bentonite seal was placed in the bore hole at 10-20 ft and the remainder of the hole was backfilled with cuttings to the surface.

enclosures: photos, lab results, bore log

CHLORIDE FIELD TESTS

LOCATION	DEPTH (ft)	ppm
Soil Bore	10	164
	15	140

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

DATE 2/3/2004 PRINTED NAME Kristin Farris

SIGNATURE Kristin Farris TITLE Project Scientist

EME jct. O-25



Undisturbed Junction Box

8/22/2003



New Plumbing

12/18/2003



Delineation Drilling

1/13/2004



New Junction Box (after soil bore)

2/3/2004

BORING LOG

Kristin Farris
RICE Operating Company

Logger:	Joe Gatts; Mort Bates	Client:	RICE Operating Company	Well ID:	SB-1
Driller:	Atkins Engineering Associates, Inc.	Project Name:	jct. O-25		
Drilling Method:	Hollow Stem Auger	Location:	EME SWD System		
Start Date:	1/13/2004		Sec. 25, T19S, R36E		
End Date:	1/13/2004		Lea County, NM		
Notes:	TD = 20 ft; Encountered Redbed clay at 19 ft, no groundwater				

Depth (feet)	Split Spoon		Description	Lithology	Additional Notes
	chloride	PID			
0.0					
1.0					
2.0					
3.0					
4.0			Poorly Graded Sand: soft, reddish tan, dry		
5.0					
6.0					
7.0					
8.0					
9.0					
10.0	164	179	Caliche: firm, light tan, dry		lab = 782.6 ppm TPH
11.0					
12.0					
13.0			Clayey Sand with Caliche: firm, reddish brown, damp		
14.0	product on sample				
15.0	140	26.3			lab = 176 ppm cl lab = 21.1 ppm TPH
16.0					
17.0			Clayey Sand: firm, reddish brown, moist		
18.0					
19.0					
20.0			Fat Clay: stiff, red, moist		

Backfilled with Drill Cuttings

Bentonite Seal 10-20 ft

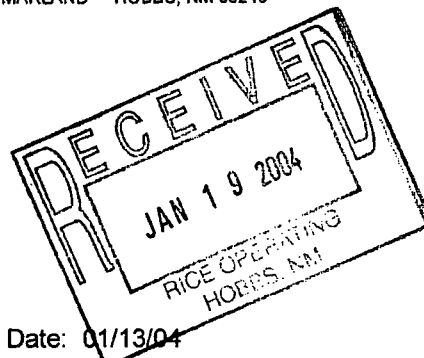


ARDINAL LABORATORIES

PHONE (325) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

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

ANALYTICAL RESULTS FOR
RICE OPERATING CO.
ATTN: JOE GATTS
122 W. TAYLOR
HOBBS, NM 99240
FAX TO: (505) 397-1471

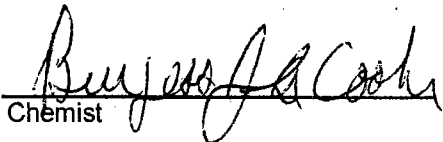


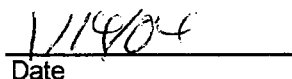
Receiving Date: 01/14/04
Reporting Date: 01/15/04
Project Number: NOT GIVEN
Project Name: O-25
Project Location: EME

Sampling Date: 01/13/04
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (>C ₁₀ -C ₂₈) (mg/Kg)
		01/14/04	01/14/04
H8360-1	SOIL BORE 10' BGS	75.6	707
Quality Control		773	736
True Value QC		800	800
% Recovery		96.6	92.0
Relative Percent Difference		6.2	5.0

METHOD: SW-846 8015 M


Chemist


Date

H8360.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.



2111 Beechwood, Abilene, TX 79603 101 East Marland, Hobbs, NM 88240

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

Page ____ of ____

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476.

**ARDINAL
LABORATORIES**

PHONE (325) 873-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2328 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
RICE OPERATING CO.
ATTN: KRISTIN FARRIS
122 W. TAYLOR
HOBBS, NM 99240
FAX TO: (505) 397-1471

Receiving Date: 01/14/04
Reporting Date: 01/15/04
Project Number: NOT GIVEN
Project Name: O-25
Project Location: EME

Sampling Date: 01/13/04
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC/AH

LAB NUMBER SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (>C ₁₀ -C ₂₈) (mg/Kg)	Cl* (mg/Kg)
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ANALYSIS DATE	01/14/04	01/14/04	01/15/04
H8361-1 SOIL BORE 15' BGS	<10.0	21.1	176
Quality Control	773	736	980
True Value QC	800	800	1000
% Recovery	96.6	92.0	98.0
Relative Percent Difference	6.2	5.0	3.0

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; Cl: Std. Methods 4500-ClB

*Analysis performed on a 1:4 w/v aqueous extract.


Chemist1/15/04
Date

H8361.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 (505) 983-2326 • 101 E. MARLAND • HOBBS, NM 88240

Sampling Date: 01/13/04
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

	GRO	DRO
	(C ₆ -C ₁₀)	(>C ₁₀ -C ₂₈)
LAB NUMBER SAMPLE ID	(mg/Kg)	(mg/Kg)

ANALYSIS DATE:	01/14/04	01/14/04
H8380-1 SOIL BORE 10' BGS	75.6	707
Quality Control	773	736
True Value QC	800	800
% Recovery	96.6	92.0
Relative Percent Difference	6.2	5.0

METHOD: SW-846 8015 M

Bryan J. Cook
Chemist

1/14/04
Date

H8360.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.



Current Photodocumentation

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

EME O-25 (1R427-32)
Unit Letter O, Section 25, T19S, R36E



Facing East

1/11/2013



Facing North

1/11/2013