1R-427-348

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From:

Hansen, Edward J., EMNRD

Sent:

Wednesday, February 06, 2013 6:12 PM

To:

Hack Conder (hconder@riceswd.com)

Cc:

Leking, Geoffrey R, EMNRD; Laura Pena (Ipena@riceswd.com); Katie Jones

<kjones@riceswd.com> (kjones@riceswd.com); Scott Curtis (scurtis@riceswd.com)

Subject:

Remediation Plan (1R427-348) Termination - ROC EME O-13 EOL Site

RE: Termination Request

for the Rice Operating Company's

EME O-13 EOL Site

Unit Letter O, Section 13, T20S, R36E, NMPM, Lea County, New Mexico

Remediation Plan (1R427-348) 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 February 1, 2013 (received February 4, 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 (1R427-348) 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 8807

February 1, 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-13 EOL (1R427-348): UL/O, Sec. 13, T20S, 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 2010, ROC initiated work on the former O-13 EOL junction box. The site is located in UL/O, Sec. 13, T20S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 32 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x3x7-ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in low concentrations of each. The 7 ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of <16 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The excavated soil was returned to the excavation and contoured to the surrounding area. On 11/12/2010, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate. A junction box is no longer needed at the site.

The junction box site location map, final report, photodocumentation, laboratory analysis, PID sheet, chloride graph 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.

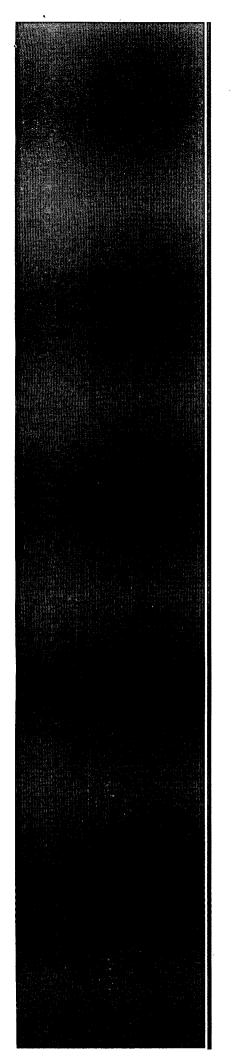
Sincerely,

RICE Operating Company

Hack Conder

Environmental Manager

enclosures



Site Location Map

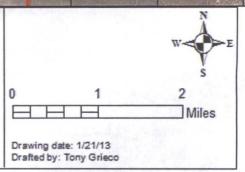
RICE *Operating Company* (ROC) 112 West Taylor Hobbs, NM 88240 Phone: (575) 393-9174 Fax: (575) 397-1471

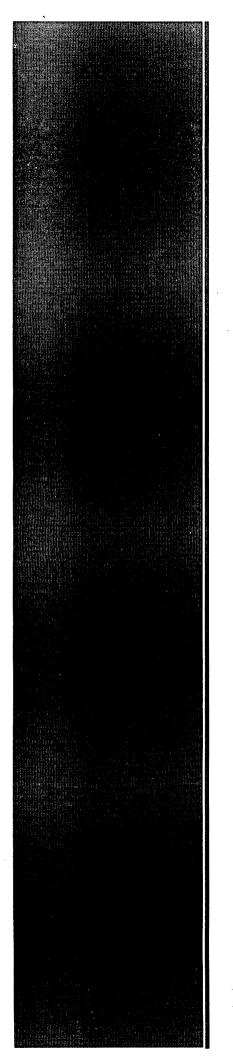
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EME O-13 EOL

UL O SECTION 13 T-20-S R-36-E LEA COUNTY, NM





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 Width **Eunice Monument O-13 EOL** 36E Eumont (EME) Eliminated LAND TYPE: BLM STATE X FEE LANDOWNER OTHER NMOCD SITE ASSESSMENT RANKING SCORE: 20 Depth to Groundwater 32 feet Date Started 6/15/2010 Date Completed 6/15/2010 OCD Witness No Soil Excavated 3.9 cubic yards Excavation Length 5 Width 3 Depth 7 feet Soil Disposed 0 cubic yards Offsite Facility ______ n/a ____ Location _____ n/a FINAL ANALYTICAL RESULTS: Sample Date 6/15/2010 Sample Depth 7 ft. TPH and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines. CHLORIDE FIELD TESTS Sample PID (field) GRO DRO Chloride LOCATION DEPTH Location mg/kg mg/kg ppm mg/kg mg/kg SOURCE 7' GRAB 0.0 <10.0 <10 <16 background 83 3' 62 4 60 vertical delineation General Description of Remedial Action: This junction and line were eliminated 5' 83 trench at the junction (source) 6' during the pipeline replacement/upgrade program. After the former junction was removed, 60 an investigation was conducted using a backhoe to collect soil samples at regular intervals, creating a 5x3x7 ft. deep excavation. Chloride field tests were performed on each sample, which yielded low concentrations of chloride similar to that of the background sample. Organic vapors were measured using a PID, which also yielded low concentrations. The deepest sample, 7 ft. BGS, was sent to a commercial laboratory for analysis, which confirmed low concentrations of chloride and organics. The excavated soil was returned to the excavation to ground surface and contoured to the surrounding area. On 11/12/2010, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate. enclosures: photos, lab results, PID (field) screenings, chloride graph I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF. Joe Gatts SIGNATURE Not Available COMPANY RICE OPERATING COMPANY SITE SUPERVISOR

INITIAL LBB

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE Larry Bruce Baker In. DATE 3-18-11

REPORT

ASSEMBLED BY Larry Bruce Baker Jr.

EME O-13 EOL





Delineation trench being dug

6/15/2010



Seeding site 11/12/2010



Final excavation

6/15/2010



Covering seed

11/12/2010



ANALYTICAL RESULTS FOR RICE OPERATING COMPANY ATTN: BRUCE BAKER 112 W. TAYLOR HOBBS, NM 88240

Receiving Date: 06/15/10 Reporting Date: 06/17/10

Project Number: NOT GIVEN

Project Name: EME O-13 EOL (20/36) Project Location: EME O-13 EOL (20/36)

LAB NUMBE SAMPLE ID

Sampling Date: 06/15/10 Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: JH Analyzed By: AB/HM

GRO

DRO

 (C_6-C_{10}) (>C₁₀-C₂₈) CI*

(mg/kg)

(mg/kg)

(mg/kg)

ANALYSIS DATE	06/16/10	06/16/10	06/16/10
H20122-1 SOURCE @ 7'	<10.0	<10.0	< 16
	-		
		·	
Quality Control	504	460	500
True Value QC	500	500	500
% Recovery	101	92.0	100
Relative Percent Difference	0.2	1.0	< 0.1



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

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

Reported on wet weight.

Chemist

Date

ARDINAL LABORATORIES

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603 (505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325)673-7020

Company Name: Rice Operating	Cow pary	BILL 70	ANALYSIS REQUEST
Project Manager: Bruce Baker		P.O. #:	
Address: 122 W. Taylor		Company:	1
City: 1965 State: A	M Zip: 88240	Attn:	
City: 150665 State: 1.7 Phone #: 575 - 393 - 9174 Fax #: 5	75-397-1471	Address:	
Project #: Project O	vner:	City:	
Project Name: EME 0-13 Eas	20/36	State: Zip:	[]
Project Location:		Phone #:	
mpler Name: J. Gatts		Fax #:	
FOR LAB USE ONLY	MATRIX	PRESERV. SAMPLING	
Lab I.D. Sample I.D.		SLUDGE OTHER: ACID/BASE: ICE / COOL OTHER:	13 H
H201221 Source & 7'	61 2	X 6/15/10 11:00	X K
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PLEASE NOTE: Liability and Demages, Cordinal's fisbility and client's exclusive ter enabyses. At claims including those for negligance and any other cause whatsoever service. In no event shall Cardinat be liable for incidental or consequental damages affiliates or successors arising out of or related to the performance of services heres.	thall be deemed walvad unless made in willin ncluding without limitation, business interrupt dor by Cardinal, (oggidess of whather such o	g and received by Cardinal within 30 days after completion of one, loss of use, or loss of profits incurred by client, its subsidialm is based upon any of the above ablance representations.	of the applicable dearles when
Relinquished By: Date:	Received By:	Phone R Fax Resi	esult: ☐ Yes ☐ No Add'l Phone #: ult: ☐ Yes ☐ No Add'l Fax #:
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Sampler UPS - Bus - Other:	Cool Inta 	ct (Initials) Yes A	

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

#26

RICE OPERATING COMPANY

122 West Tayor Hobbs, NM 88240 PHONE: (575) 393-9174 FAX: (575) 397-1471 PID METER CALIBRATION & FIELD REPORT FORM

Mode	l: PGM 7300 Serial No I: PGM 7300 Serial No	o: 590-000183 o: 590-000508 o: 590-000504	Model Number:	Model: PGM 7600 Model: PGM 7600 Model: PGM 7230	Serial No: 110-02392 Serial No: 110-01374 Serial No: 592-90331
LOT NO: 92	GAS COMPOSITION	N: ISOBUTY	LENE 100PPM / AIR EXPIRATION DAT	/ .	,,,
FILL DATE:	-057/		METER READING		
		ACCURAC	CY: +/- 2%	,	
SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	0-13 Eol	0	13	20	36
	MPLE ID	PID	SAMPLE ID		, PID
Back grou	nd (9 6"	4			
Source & 4'		ф	·		
Source	Source 9 4				
Source	G 5'	ø		·	
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Source	G 7'	Ø			
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I verify that I have calibrated the above instrument in accordance to the manufacture operation manual.

SIGNATUE: Joe Dut

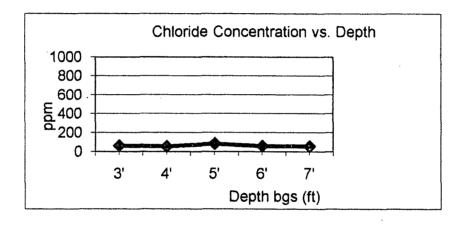
DATE: 6/15/10

EME O-13 EOL

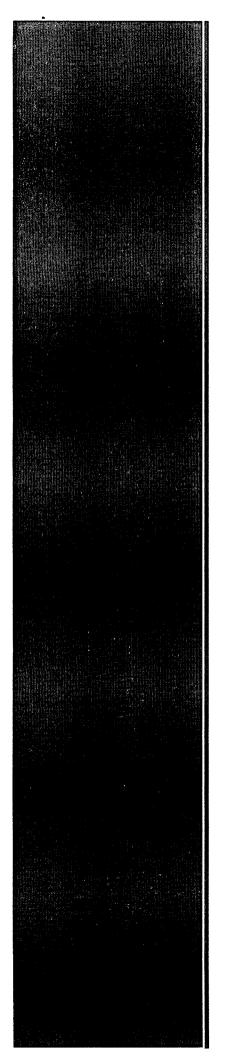
Unit 'O', Sec. 13, T20S, R36E

Backhoe samples at the junction (source)

Depth bgs (ft)	[Cl] ppm
3'	62
4'	54
5'	83
6'	60
7'	57



Groundwater = 32 ft.



Current Photodocumentation

RICE *Operating Company* (ROC) 112 West Taylor Hobbs, NM 88240

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

EME O-13 EOL (1R427-348) Unit Letter O, Section 13, T20S, R36E



Facing Northeast 1/30/2013



Facing East 1/30/2013