

1R - 427-353

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, February 25, 2013 4:53 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 (1R427-353) Termination - ROC EME I-25 EOL Site

**RE: Termination Request
for the Rice Operating Company's
EME I-25 EOL Site
Unit Letter I, Section 25, T19S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-353) 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 7, 2013 (received February 11, 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 (1R427-353) 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

RECEIVED OCD
2013 FEB 11 P 1:10

RICE *Operating Company*

112 West Taylor • Hobbs, New Mexico 88240

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

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8821

February 7, 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 I-25 EOL (1R427-353): UL/I, 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 2010, ROC initiated work on the former I-25 EOL junction box. The site is located in UL/I, Sec. 25, T19S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 43 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x2x7 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 32 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 12/6/2010, the site was seeded with a blend of native vegetation. A junction box is no longer needed at the site. Vegetation has rebounded at the site, so no re-vegetation efforts are needed.

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

A handwritten signature in black ink, appearing to read "H. Conder", with a long horizontal flourish extending to the right.

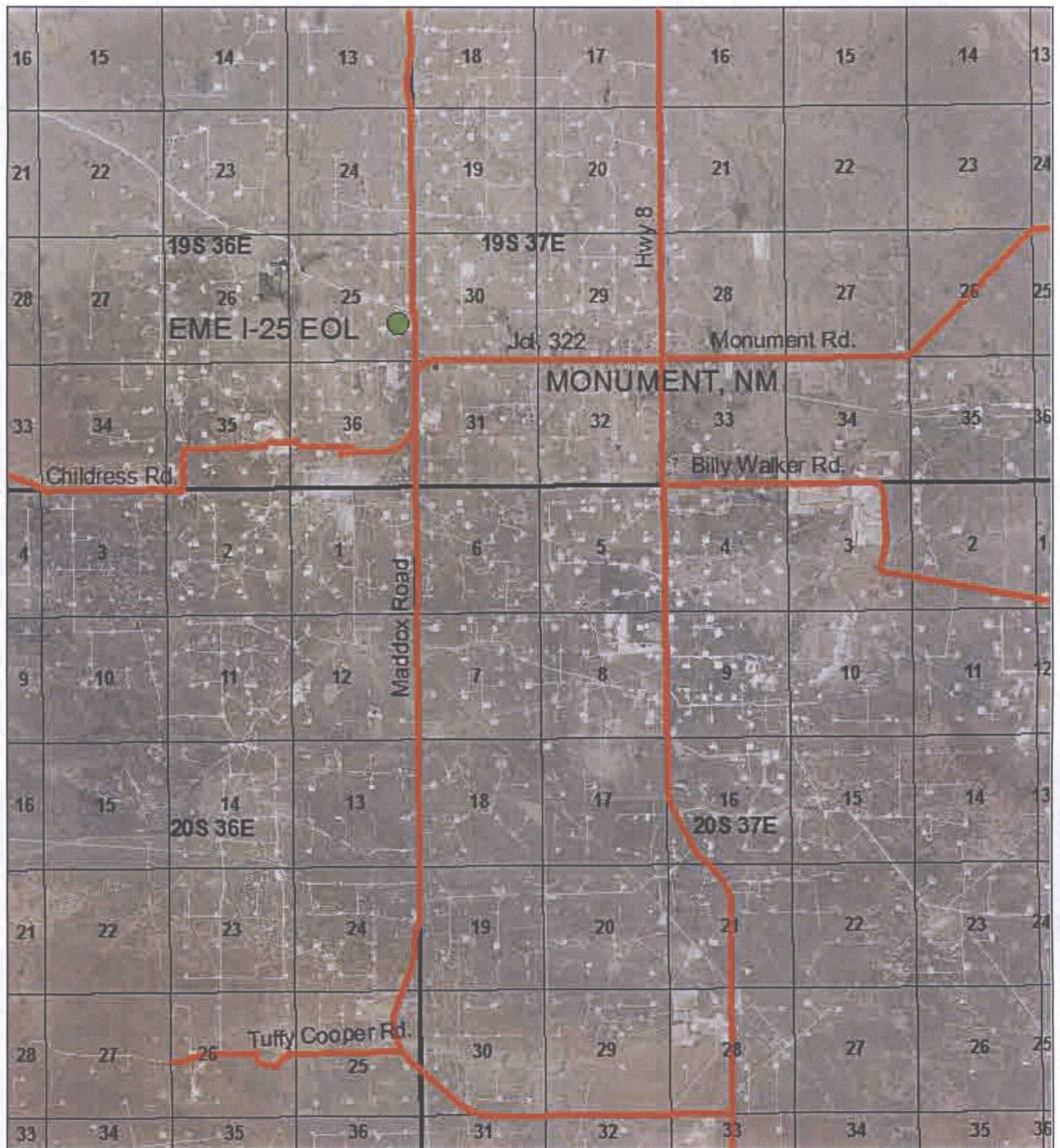
Hack Conder
Environmental Manager

enclosures



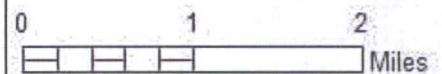
Site Location Map

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



EME I-25 EOL

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



Drawing date: 1/21/13
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		
Eunice Monument Eumont (EME)	I-25 EOL	I	25	19S	36E	Lea	Length	Width	Depth
							Eliminated		

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

Depth to Groundwater 43 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 12/6/2010 Date Completed 12/6/2010 OCD Witness no

Soil Excavated 2.6 cubic yards Excavation Length 5 Width 2 Depth 7 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 12/6/2010 Sample Depth 7 ft.

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

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
SOURCE 7' GRAB	0.0	<10.0	<10	32

CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
Background	6"	58
vertical delineation trench at the junction (source)	3'	61
	4'	58
	5'	55
	6'	90
	7'	84

General Description of Remedial Action: This junction and line were eliminated

during the pipeline/upgrade program. After the former junction box was removed, an

investigation was conducted using a backhoe to collect samples at regular intervals

producing a 5X2X7-ft. deep excavation. Chloride field test 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 yielded low concentrations. The deepest sample, 7 ft. BGS, was sent to a commercial laboratory for analysis of chloride and

TPH, which confirmed low concentrations of each. The excavated soil was returned to the excavation to ground surface and contoured

to the surrounding area. On 12/06/2010, 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.

SITE SUPERVISOR Dak Harris SIGNATURE *Dak Harris* COMPANY RICE OPERATING COMPANY

REPORT

ASSEMBLED BY Zach Conder INITIAL *ZC*

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE *Larry Bruce Baker Jr.* DATE 2-24-11

EME I-25 EOL

Unit I, Section 25, T19S, R36E



Sampling initial vertical delineation trench

12/06/2010



Seeding site

12/06/2010



Raking in seed

12/06/2010



Site final photo

12/06/2010



PHONE (575) 393-2326 * 101 E. MARLAND * HOBBS, NM 88240

Analytical Results For:

Rice Operating Company
Bruce Baker
112 W. Taylor
Hobbs NM, 88240
Fax To: (575) 397-1471

Received: 12/06/2010
Reported: 12/08/2010
Project Name: EME I-25 EOL (19/36)
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 12/06/2010
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: SOURCE @ 7' (H021456-01)

Chloride, SM4500Cl-B			mg/kg		Analyzed By: HM				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	12/07/2010	ND	432	108	400	0.00	

TPH 8015M			mg/kg		Analyzed By: AB				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	12/08/2010	ND	193	96.5	200	19.4	
DRO >C10-C28	<10.0	10.0	12/08/2010	ND	190	94.8	200	9.14	

Surrogate: 1-Chlorooctane 92.9 % 70-130

Surrogate: 1-Chlorooctadecane 102 % 70-130

COPY

Cardinal Laboratories

*=Accredited Analyte

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 the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager

Page 2 of 4

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

[illegible]

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

#26

RICE OPERATING COMPANY

122 West Taylor Hobbs, NM 88240
 PHONE: (505) 393-9174 FAX: (505) 397-1471
 PID METER CALIBRATION & FIELD REPORT FORM

CK. ☒
 MODEL ☐
 NO. ☐

MODEL: PGM 7300 SERIAL NO: 590-000508
 MODEL: PGM 7300 SERIAL NO: 590-000504
 MODEL: PGM 7320 SERIAL NO: 592-903318
 MODEL: PGM 7300 SERIAL NO: 590-000183

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 925621	EXPIRATION DATE: 9/27/12
METER READING ACCURACY: 100	

ACCURACY: +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	I-25 FOL	I	25	19	36

SAMPLE ID	PID	SAMPLE ID	PID
Background @ 6'	0		
3'	0.5		
4'	0.3	CONF	
5'	0.1		
6'	0.2		
7'	0		

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

SIGNATURE:

Doc Harris

DATE:

12/6/10

CHLORIDE CONCENTRATION CURVE

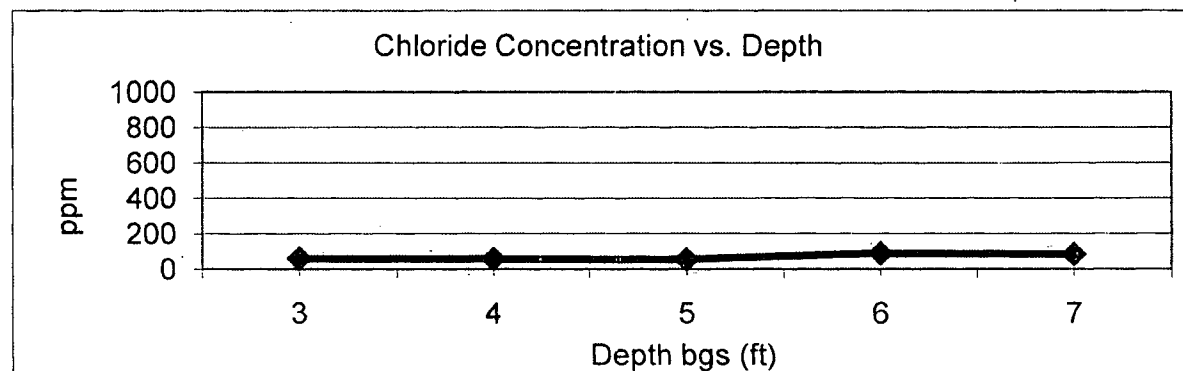
RICE *Operating Company*

EME I-25 EOL

Unit 'I', Sec. 25, T19S, R36E

Backhoe samples at the junction (source)

Depth bgs (ft)	[Cl ⁻] ppm
3	61
4	58
5	55
6	90
7	84



Groundwater = 43 ft.



Current Photodocumentation

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

EME I-25 EOL

UL/I, Section 25, T19S, R36E



Facing south

2/4/2013



Facing west

2/4/2013