

1R - 427-356

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, February 26, 2013 11:05 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 (1R427-356) Termination - ROC EME Jct H-32 Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct H-32 Site
Unit Letter H, Section 32, T19S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-356) 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 14, 2013 (received February 19, 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 (1R427-356) 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

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8845

RECEIVED

FEB 19 2013

February 14, 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

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

RE: Termination Request
EME Jct. H-32 (1R427-356): UL/H, Sec. 32, T19S, R37E
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 H-32 junction box. The site is located in UL/H, Sec. 32, T19S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 31 +/- feet. A soil bore was initiated on July 26, 2010 at the former junction box due to the inability to excavate through a rock formation. The boring was advanced to a total depth of 12 ft below ground surface (BGS) with soil samples collected at regular intervals. The 12 ft BGS sample was analyzed by a commercial laboratory, resulting in a chloride concentration of 64 mg/kg and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The entire bore hole was plugged with bentonite to ground surface. 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, soil bore log, 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 stylized flourish at the end.

Hack Conder
Environmental Manager

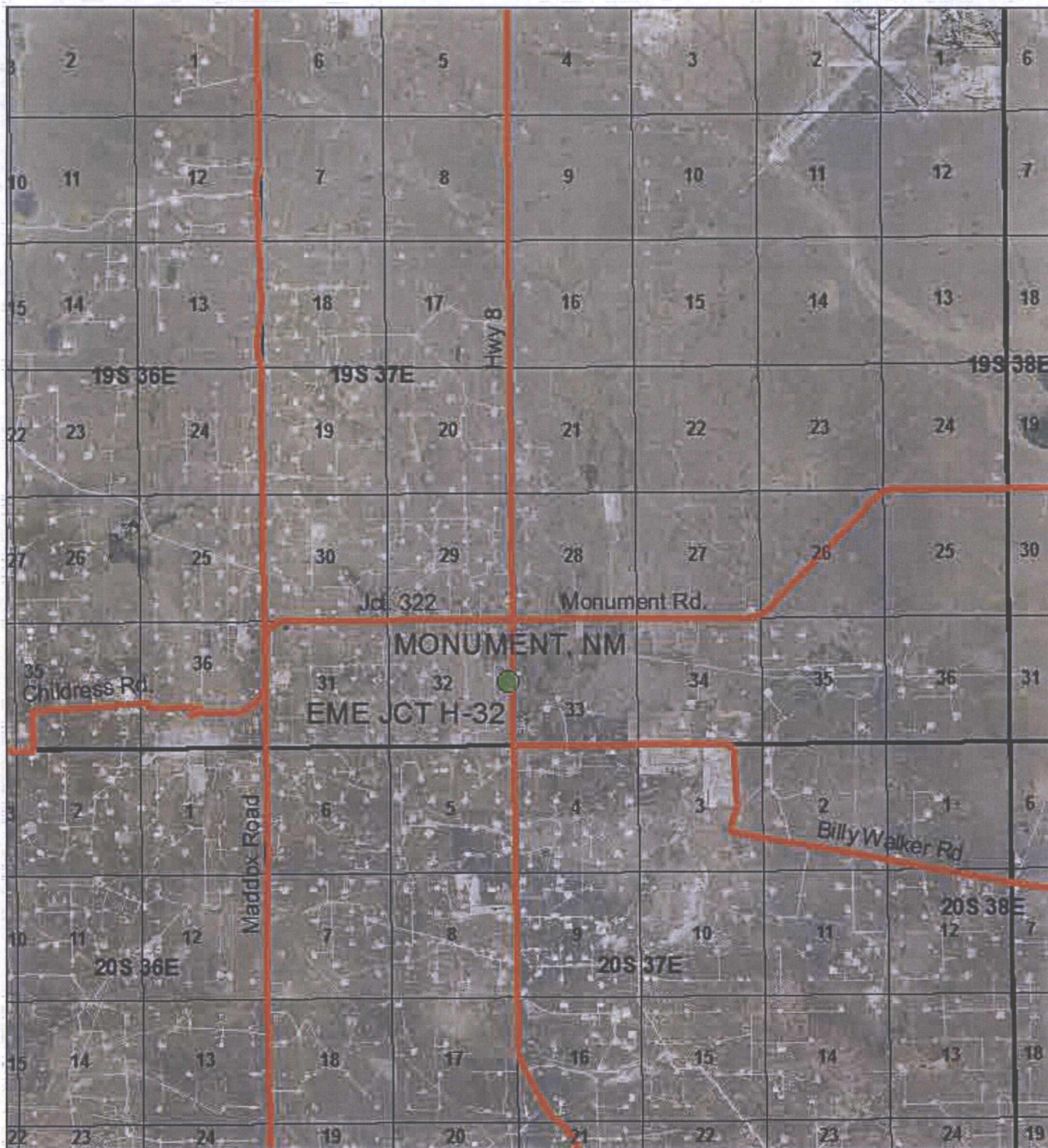
enclosures

RECEIVED OCD
2013 FEB 19 P 3:11



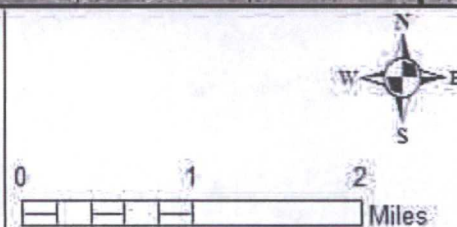
Site Location Map

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



EME JCT H-32

UL H SECTION 32
T-19-S R-37-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)	Jct. H-32	H	32	19S	37E	Lea	Length	Width	Depth
							Eliminated		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER Irwin Boyd OTHER _____

Depth to Groundwater 31 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 7/26/2010 Date Completed 7/26/2010 OCD Witness no

Soil Excavated 0.0 cubic yards Excavation Length 0 Width 0 Depth 0 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 7/26/2010 Sample Depth 12 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 @ 12'	60.2	<10.0	<10.0	64

CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
Soil Bore # 1 at former junction (Source)	3'	59
	4'	98
	5'	89
	6'	101
	7'	108
	8'	91
	9'	86
	10'	89
	11'	88
	12'	85


General Description of Remedial Action: This junction was eliminated during the pipeline replacement/upgrade program. After the junction box was removed, a soil bore was conducted at the former junction box due to the inability to excavate through the rock formation. Chloride field test performed on each sample yielded low concentrations. Organic vapors were measured using a PID, which yielded relatively low concentrations. The deepest sample, 12 ft. BGS, was sent to a commercial laboratory for analysis of chloride and TPH, which confirmed low concentrations of each. The entire bore hole was plugged with bentonite to ground surface. The site was not seeded due to the vegetation was intact.

enclosures: photos, soil bore log, lab results, PID (field) screenings, chloride curve

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

SITE SUPERVISOR Jordan Woodfin SIGNATURE  COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Larry Bruce Baker Jr. INITIAL LB

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE  DATE 2-28-11

EME Jct. H-32

Unit H Section 32, T19S, R37E



Drilling Soil bore

7/26/2010



Soil Bore plugged with bentonite

7/26/2010

Logger:	Lara Weinheimer
Driller:	Harrison & Cooper
Consultant:	RECS
Drilling Method:	Air Rotary
Start Date:	7/26/2010
End Date:	7/26/2010



Project Name: EME jct. H-32 **Well ID:** SB-1
Location: UL/H sec. 32 T19S R37E
Lat: N 32°37'0.877" **County:** Lea
Long: W 103°15'56.903" **State:** NM

Comments: All samples from cuttings. Located at source of the former junction box site.
 Drafted by: Lara Weinheimer
 TD = 12 ft Estimated depth to GW = 31 ft

Depth (feet)	chloride field tests	LAB	PID	Description	Lithology	Well Construction
3 ft	59		0.8	Tan to black caliche with chert. Slight odor.		
4 ft	98		0.8	Tan to black caliche with chert. Slight odor.		
5 ft	89		1.2	Tan to black caliche with chert. Slight odor.		
6 ft	101		11.9	Tan to black caliche with chert. Slight odor.		
7 ft	108		13.6	Tan to black caliche with chert. Slight odor.		
8 ft	91		60.2	Tan to black caliche with chert. Slight odor.		
9 ft	86		0.8	White coarse caliche		
10 ft	89		0.2	White coarse caliche		
11 ft	88		1.5	White coarse caliche		
12 ft	85	CI-64	1.2	White coarse caliche		
		GRO				
		<10				
		DRO				
		<10				

bentonite seal

COPY



ARDINAL LABORATORIES

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

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

Receiving Date: 07/28/10
Reporting Date: 07/29/10
Project Number: NOT GIVEN
Project Name: EME JCT. H-32 (19/37)
Project Location: EME JCT. H-32 (19/37)

Sampling Date: 07/26/10
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: JH
Analyzed By: AB/HM

LAB NUMBER SAMPLE ID:

GRO DRO
(C₆-C₁₀) (>C₁₀-C₂₈) C₁₅
(mg/kg) (mg/kg) (mg/kg)

ANALYSIS DATE	07/29/10	07/29/10	07/29/10
H20443-1 SOURCE @ 12' BGS	<10.0	<10.0	64
Quality Control	465	456	520
True Value QC	500	500	500
% Recovery	93.0	91.2	104
Relative Percent Difference	0.3	0.5	<0.1

METHODS: TPH, GRO & DRO: EPA SW-846.8015/M; C₁₅: Std. Methods 4500-C1B.

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

Reported on wet weight.

Chad Keene
Chemist

07/29/10
Date

H20443-TCL RICE

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 analysis. 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. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

RICE OPERATING COMPANY

122 West Taylor ~ Hobbs, NM 88240

PHONE: (575) 393-9174 FAX: (575) 397-1471

PID METER CALIBRATION & FIELD REPORT FORM

CK	
MODEL	✓
NO.	

MODEL: PGM 7300	SERIAL NO: 590-000183
MODEL: PGM 7300	SERIAL NO: 590-000504 <i>508</i>
MODEL: PGM 7600	SERIAL NO: 110-12383
MODEL: PGM 7600	SERIAL NO: 110-02920

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: <i>930132</i>	EXPIRATION DATE: <i>9-28-13</i>
FILL DATE:	METER READING ACCURACY: <i>100.1</i>

ACCURACY: +/- 2%

SYSTEM	SITE	UNIT	SECTION	TOWNSHIP	RANGE
EME	<i>ict H-32</i>	H	32	T19S	R37E

SAMPLE ID: *Soil bore #1*

DEPTH	PID	DEPTH	PID	DEPTH	PID	DEPTH	PID
3'	0.8						
4'	0.8						
5'	1.2						
6'	11.9						
7'	13.6						
8'	60.2						

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

Signature *[Signature]*

Date *7-26-10*

SITE MAP



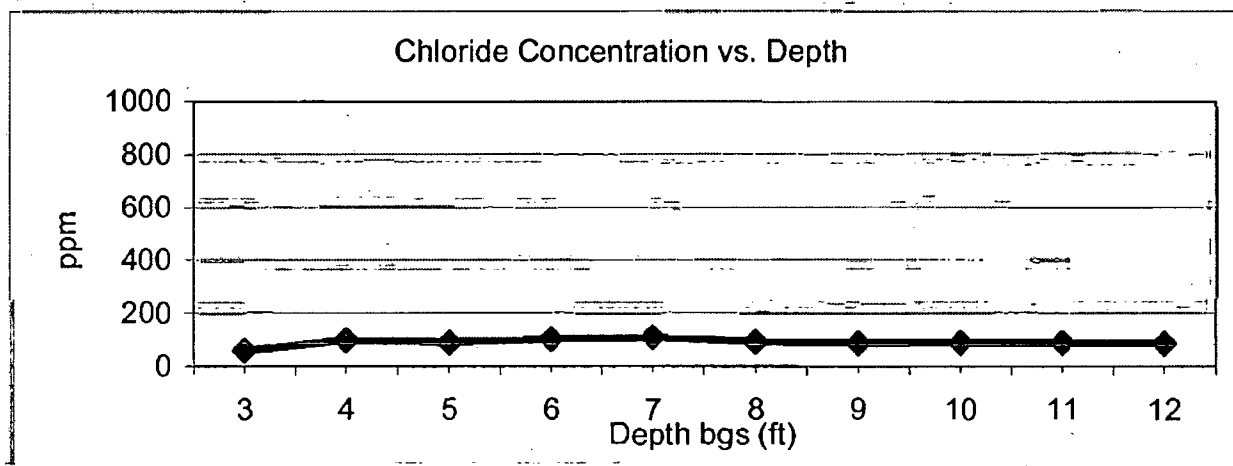
Copy

EME Jct. H-32

Unit 'H', Sec. 32, T19S, R37E

Soil bore at the former junction (source)

Depth bgs (ft)	[Cl] ppm
3	59
4	98
5	89
6	101
7	108
8	91
9	86
10	89
11	88
12	85



Groundwater = 31 ft.



Current Photodocumentation

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

EME Jct. H-32
UL/H, Section 32, T19S, R37E



Facing southeast

2/5/2013



Facing north

2/5/2013