

1R - 427-309

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, March 26, 2013 12:44 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 (1R427-309) Termination - ROC EME Jct D-15 Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct D-15 Site
Unit Letter D, Section 15, T21S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-309) 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 March 8, 2013 (received March 13, 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 (1R427-309) 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 9279

RECEIVED

March 8, 2013

MAR 13 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. D-15 (1R427-309): UL/D, Sec. 15, T21S, 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 2009, ROC initiated work on the former D-15 junction box. The site is located in UL/D, Sec. 15, T21S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 195 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 35x25x12 ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in chloride concentrations that decreased with depth. The excavated soil was blended on site and representative composite samples were collected from the excavation walls, bottom and blended backfill, resulting in a 4-wall chloride concentration of 160 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The bottom sample resulted in a chloride concentration of 352 mg/kg, a GRO concentration below detectable limits and a DRO concentration of 39.9 mg/kg. The blended backfill sample resulted in a chloride concentration of 96 mg/kg, a GRO concentration below detectable limits and a DRO concentration of 21.9 mg/kg. The blended backfill was returned to the excavation to ground surface and contoured to the surrounding area. On 2/25/2009, 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. Vegetation

will also provide a natural infiltration barrier for the site since plants capture water through their roots thereby reducing the volume of water moving through the vadose zone to groundwater.

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 stylized flourish at the end.

Hack Conder
Environmental Manager

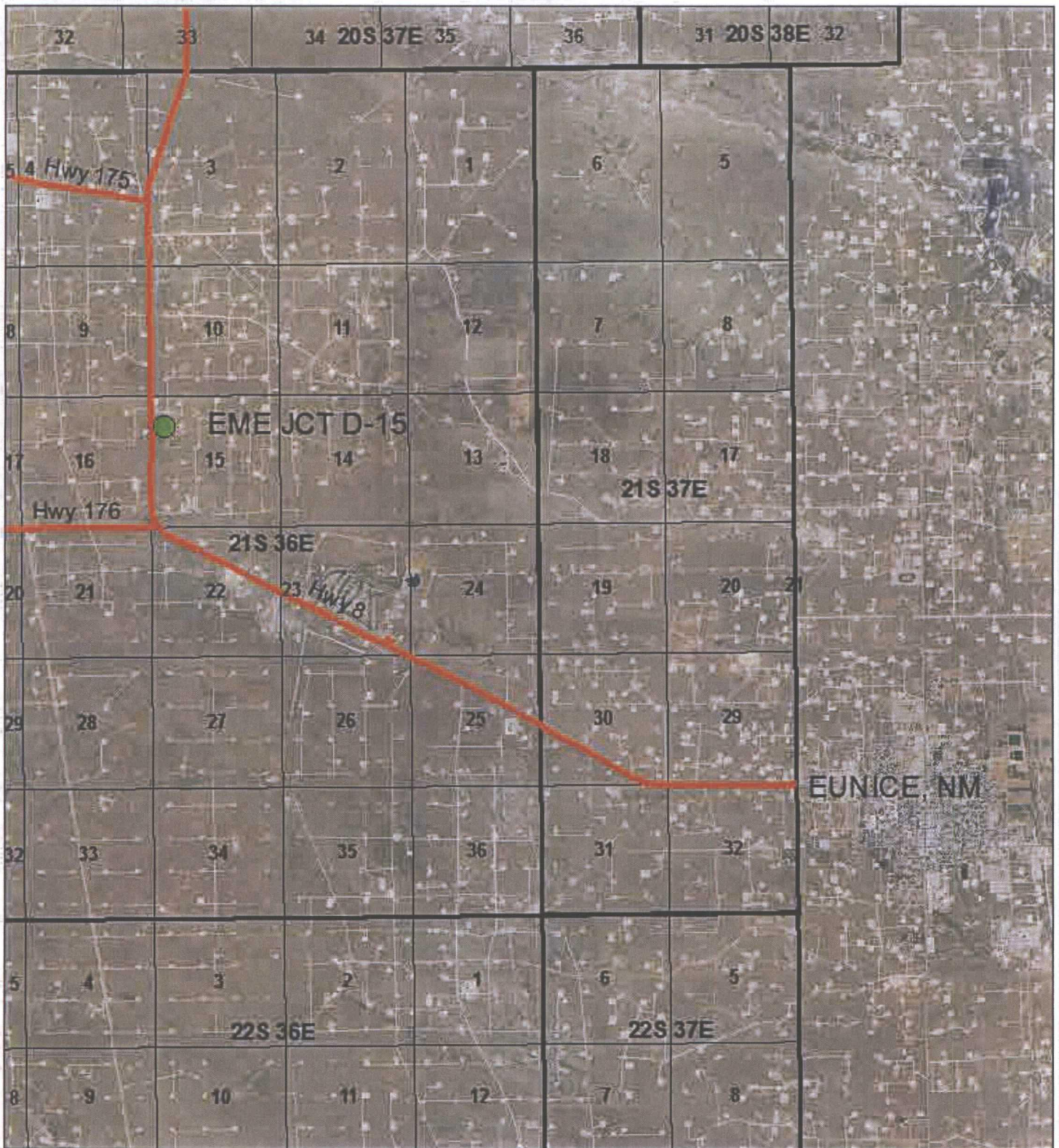
enclosures

RECEIVED OGD
2013 MAR 13 P 2:27



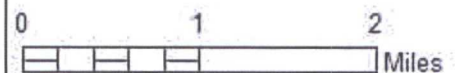
Site Location Map

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



EME JCT D-15

UL D SECTION 15
T-21-S R-36-E
IEA 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. D-15	D	15	21S	36E	Lea	Length	Width	Depth
							eliminated		

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

Depth to Groundwater 195 feet NMOC SITE ASSESSMENT RANKING SCORE: *20

Date Started 1/13/2009 Date Completed 2/25/2009 OCD Witness no

Soil Excavated 389 cubic yards Excavation Length 35 Width 25 Depth 12 feet

Soil Disposed 96 cubic yards Offsite Facility Sundance Location Eunice, NM

FINAL ANALYTICAL RESULTS: Sample Date 2/17/2009 Sample Depth 12 ft

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

CHLORIDE FIELD TESTS

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
4-WALL COMP.	2.8	<10.0	<10.0	160
BOTTOM COMP.	0.2	<10.0	39.9	352
BLENDED BACKFILL	4.4	<10.0	21.9	96

LOCATION	DEPTH	mg/kg
4-wall comp.	n/a	240
bottom comp.	12'	420
blended backfill	n/a	150
background	6"	90
vertical delineation trench at 15 ft North of the junction (source)	1'	264
	2'	348
	3'	335
	4'	420
	5'	461
	6'	397
	7'	224
	8'	506
	9'	586
	10'	511
	11'	365
	12'	336

General Description of Remedial Action:

This junction was eliminated during the pipeline replacement/upgrade program. After the former junction box was removed, an investigation was conducted using a backhoe to collect soil samples at regular intervals producing a 35x25x12-ft-deep excavation. Chloride field tests were performed on each sample, which yielded generally low concentrations. Organic vapors were measured using a PID, which also yielded low concentrations. The excavated soil was blended on site with clean, imported soil. Representative composite samples were collected from the excavation walls, bottom, and blended excavated soil. Laboratory analysis of the representative samples confirmed low concentrations. The blended excavated soil was returned to the excavation to ground surface and contoured to the surrounding area. On 2/25/2009, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

*A windmill is located 580 ft west of the site.

enclosures: photos, 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 Eric Garrison SIGNATURE [Signature] COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Katie Jones INITIAL [Initials]

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE [Signature] DATE 5-13-09

EME Jct. D-15

Unit D, Section 15, T21S, R36E



site prior to excavation, facing north

1/13/2009



collecting a soil sample, facing east

1/19/2009



final 35x25x12-ft excavation, facing west

2/24/2009



seeding backfilled site, facing north

2/25/2009



PHONE (575) 993-2326 • 101 E. MARLAND • MOORE, NM 88240

ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: ERIC GARRISON
122 W. TAYLOR
HOBBS, NM 88240

Receiving Date: 02/17/09
Reporting Date: 05/07/09**
Project Number: NOT GIVEN
Project Name: EME JCT D-15
Project Location: EME JCT D-15

Sampling Date: 02/17/09
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: ML
Analyzed By: AB/HM

COPY

LAB NUMBER SAMPLE ID

GRO (C ₆ -C ₁₀) (mg/kg)	DRO (>C ₁₀ -C ₂₈) (mg/kg)	Cl*
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ANALYSIS DATE		02/19/09	02/19/09	02/19/09
H16914-1	5 PT BTM COMP @ 12"	<10.0	39.9	352
H16914-2	4 WALL COMP @ 25'x35'	<10.0	<10.0	160
H16914-3	BLENDED BACKFILL SOUTH PILE**	<10.0	21.9	98
Quality Control		546	593	500
True Value QC		500	500	500
% Recovery		109	119	100
Relative Percent Difference		4.3	3.2	2.0

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

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

****Revised Report.**

Chemist

Date _____

H16914, TCL RICE

[illegible]

1970-1980, 1981-1990, 1991-2000, 2001-2010
1970-1980, 1981-1990, 1991-2000, 2001-2010

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[illegible]

Name: <u>Baker, B</u> Date: <u>2-17-09</u> Time: <u>4:35</u> Place: _____ Notes: _____		Received by: <u>M. L. D.</u> Date: _____ Time: _____		Phone Number: _____ Fax Number: _____ E-mail Address: _____ Results: <u>B Baker @ Riceswd.com</u> <u>J Purvis @ Riceswd.com</u> * See called and #3 sample name needs to be "South". ch	
--	--	--	--	--	--

For any changes, please call William at 575-333-2400

5/7/09

RICE OPERATING COMPANY

122 West Taylor Hobbs, NM 88240

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

PID METER CALIBRATION & FIELD REPORT FORM

Check Model Number:

Model: PGM 7300 Serial No: 590-000183
Model: PGM 7300 Serial No: 590-000508
Model: PGM 7300 Serial No: 590-000504

Model: PGM 7600 Serial No: 110-023920
Model: PGM 7600 Serial No: 110-013744
Model: PGM 7600 Serial No: 110-013676

COPY

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 08-3425	EXPIRATION DATE: 08-27-09
FILL DATE: 02-29-08	METER READING ACCURACY: 100ppm

ACCURACY: +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	D-15	D	15	213	36E

SAMPLE ID	PID	SAMPLE ID	PID
5-11-11m @ 12'	2.2		
1/2 WALL COMP @ 25x35'	2.8		
Wended Beach Fill South	4.4		

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

SIGNATURE

[Signature]

DATE: 2-12-09

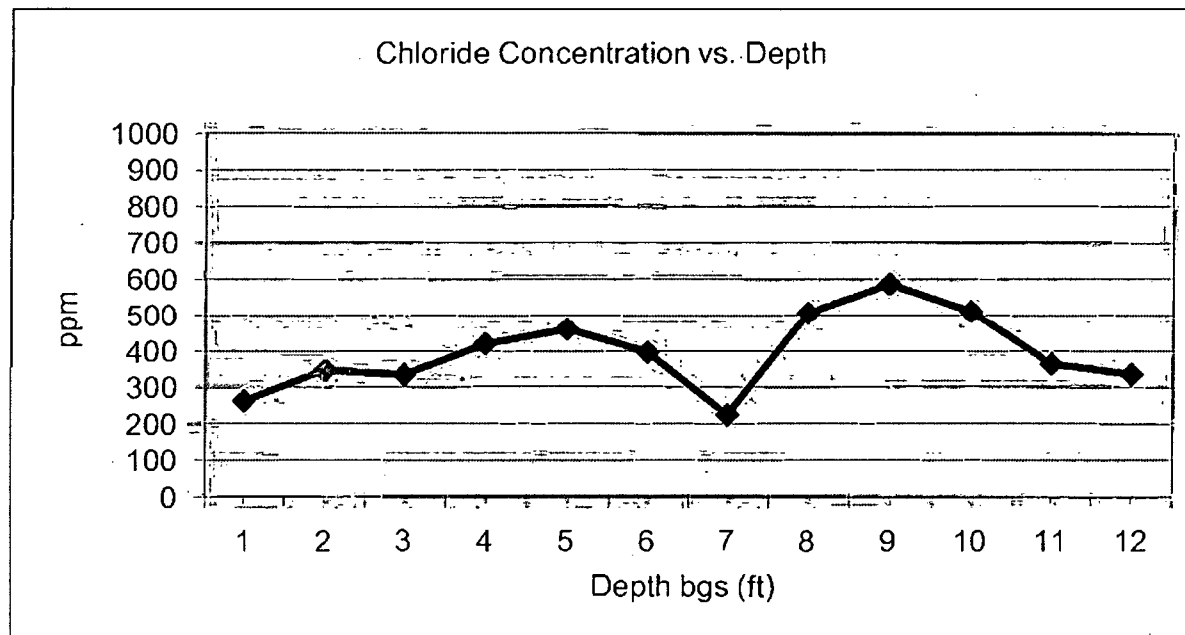
EME Jct. D-15

Unit 'D', Sec. 15, T21S, R36E

Backhoe samples at 15 ft North of the junction (source)

Depth bgs (ft)	[Cl ⁻] ppm
1	264
2	348
3	335
4	420
5	461
6	397
7	224
8	506
9	586
10	511
11	365
12	336

Groundwater = 195 ft





Current Photodocumentation

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

EME Jct. D-15
UL/D, Section 15, T21S, R36E



Facing west

2/22/2013



Facing north

2/22/2013