

1R - 427-108

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, March 27, 2013 10:21 AM
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 (1R427-108) Termination - ROC EME J-9 Site

**RE: Termination Request
for the Rice Operating Company's
EME J-9 Site
Unit Letter J, Section 9, T20S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-108) 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 (1R427-108) 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 J-9 (1R427-108): UL/J, Sec. 9, T20S, 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 2001, ROC initiated work on the former J-9 junction box. The site is located in UL/J, Sec. 9, T20S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 25 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 10x11x5 ft deep excavation. Each sample was field titrated for chlorides, resulting in low chloride concentrations. Representative samples were collected from the excavation walls and excavation bottom and sent to a commercial laboratory for analysis. The sidewall sample resulted in a chloride concentration of 120 mg/kg and gasoline range organics (GRO) and diesel range organics (DRO) concentrations below detectable limits. The bottom composite sample resulted in a chloride concentration of 299 mg/kg, a GRO concentration below detectable limits and a DRO concentration of 124 mg/kg. Both samples were also analyzed for BTEX, resulting in concentrations below detectable limits throughout.

A total of 12 cubic yards of excavated soil was properly disposed of at an NMOCD approved facility. A compacted clay liner was installed and the excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area.

Vegetation has rebounded at the site, so no re-vegetation efforts are needed. Vegetation above the liner will act as an evapo-transpiration barrier that will also inhibit the downward migration of residual chlorides and hydrocarbons. Plants capture water through their roots and so reduce the amount of water infiltrating below the root zone. A new, watertight junction was installed and has since been eliminated.

The junction box site location map, final report, laboratory analysis, disposal manifest 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

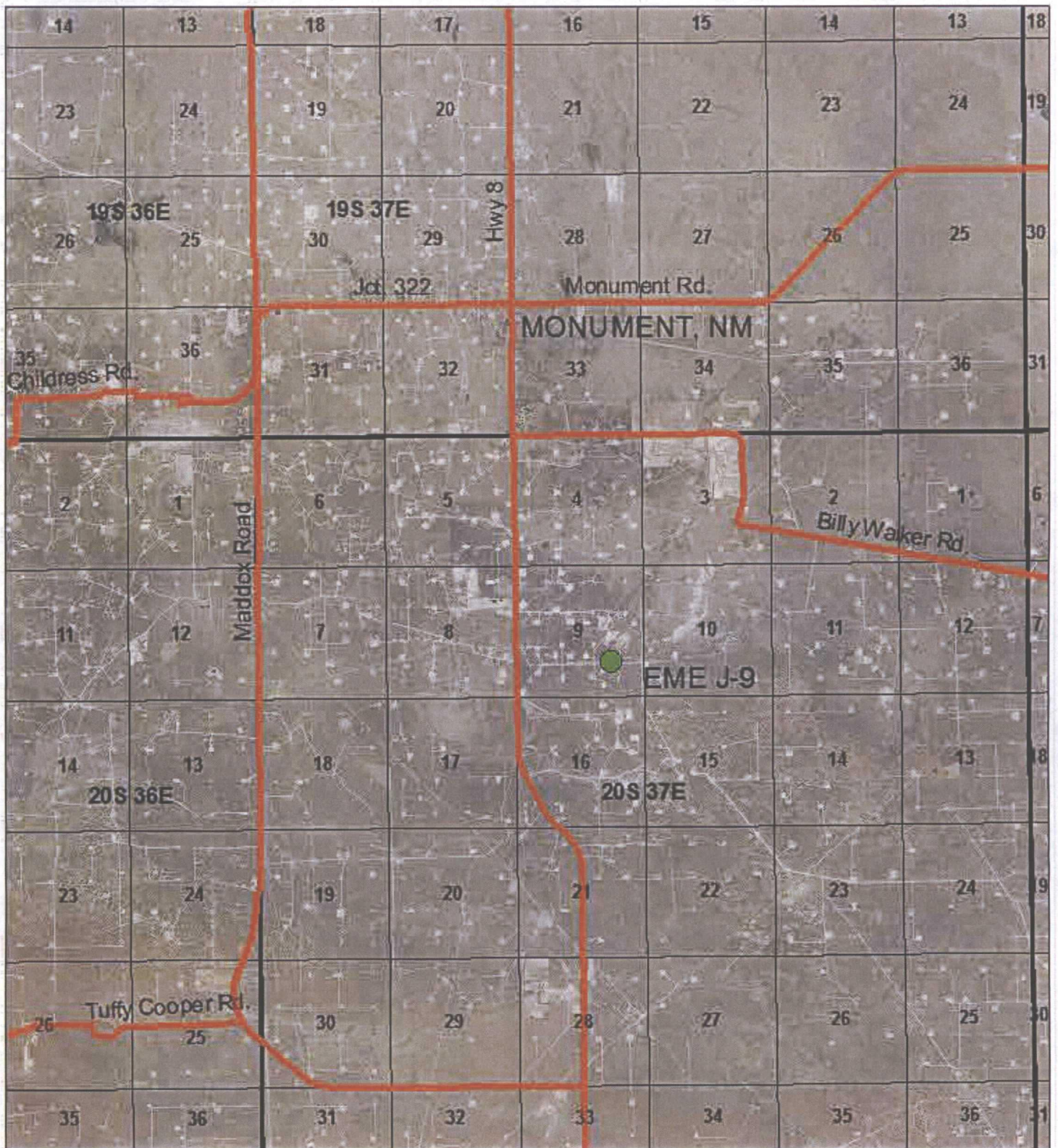
enclosures

RECEIVED OCD
2013 MAR 13 P 2:27



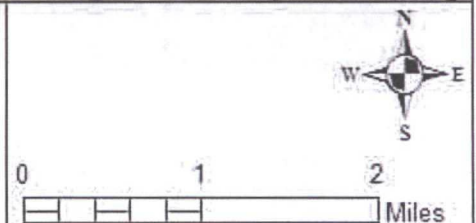
Site Location Map

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



EME J-9 (1R427-108)

Unit Letter J, Section 9,
T20S, R37E
Lea County, NM



Drawing date: 3/5/13



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	J-9	J	9	20S	37E	LEA	Length 8'	Width 7'	Depth 5'

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ SW CATTLE CO _____ OTHER _____

Depth to Groundwater _____ 25 _____ feet NMOCD SITE ASSESSMENT RANKING SCORE: _____ 20 _____

Date Started _____ 02/15/2001 _____ Date Completed _____ 02/15/2001 _____ OCD Witness _____ NO _____

Soil Excavated _____ 12 _____ cubic yards Excavation Length _____ 10 _____ Width _____ 11 _____ Depth _____ 5 _____ feet

Soil Disposed _____ 12 _____ cubic yards Offsite Facility _____ Sundance _____ Location _____ Eunice, NM _____

FINAL ANALYTICAL RESULTS: Sample Date _____ 02/15/2001 _____ Sample Depth _____ 5' _____

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

Sample Location	Benzene mg/kg	Toluene mg/kg	Ethyl Benzene mg/kg	Total Xylenes mg/kg	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SIDEWALLS	< 0.005	<0.005	<0.005	<0.015	<50	<50	120
BOTTOM	< 0.005	< 0.005	< 0.005	<0.015	<50	124	299

General Description of Remedial Action: _____ Delineated vertical and lateral extent.

Installed compacted clay barrier and water tight junction box. High impacted soil was hauled to a permitted disposal facility. Backfilled with fresh soil. Natural attenuation will remediate the remaining hydrocarbon.

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS	2'	170
BOTTOM	5'	240

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

DATE _____ February 15, 2001 _____ PRINTED NAME _____ Chris Rodriguez _____

SIGNATURE _____ *Chris Rodriguez* _____ TITLE _____ Environmental Technician _____



ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

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

ANALYTICAL RESULTS FOR
RICE OPERATING CO.
ATTN: JAMES STURGILL
122 W. TAYLOR
HOBBS, NM 88240
FAX TO:

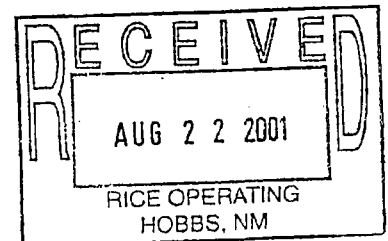
Receiving Date: 02/15/01
Reporting Date: 02/19/01
Project Number: J-9 BOTTOM & SIDES
Project Name: J-9 BOX-SIDES AND BOTTOM
Project Location: UJ-SEC9-T20-R37

Sampling Date: 02/15/01
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC/AH

LAB NUMBER SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (>C ₁₀ -C ₂₈) (mg/Kg)	CI* (mg/Kg)
	02/15/01	02/15/01	02/16/01
H5620-1 J-9 SIDES	<50	<50	120
H5620-2 J-9 BOTTOM	<50	124	299
Quality Control	728	778	1051
True Value QC	800	800	1000
% Recovery	91.0	97.3	105
Relative Percent Difference	2.3	2.5	6.8

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

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



Burgess A. Roache
Chemist

2/19/01
Date

H5620A.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.



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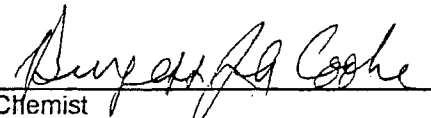
ANALYTICAL RESULTS FOR
RICE OPERATING CO.
ATTN: JAMES STURGILL
122 W. TAYLOR
HOBBS, NM 88240
FAX TO:

Receiving Date: 02/15/01
Reporting Date: 02/19/01
Project Number: J-9 BOTTOM & SIDES
Project Name: J-9 BOX-SIDES AND BOTTOM
Project Location: UJ-SEC9-T20-R37

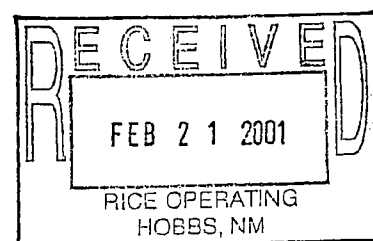
Sampling Date: 02/15/01
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC

LAB NO.	SAMPLE ID	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE		02/15/01	02/15/01	02/15/01	02/15/01
H5620-1	J-9 SIDES	<0.005	<0.005	<0.005	<0.015
H5620-2	J-9 BOTTOM	<0.005	<0.005	<0.005	<0.015
Quality Control		0.111	0.102	0.107	0.317
True Value QC		0.100	0.100	0.100	0.300
% Recovery		111	102	107	106
Relative Percent Difference		1.6	8.8	7.3	7.1

METHOD: EPA SW-846 8260


Chemist

2/19/01
Date



H5620B.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 1 of 1

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Terms and Conditions: Interest will be charged on all accounts more than 30 days past due at the rate of 24% per annum from the original date of invoice, and all costs of collection, including attorney's fees.

Sampler Relinquished: <i>James Sturgill</i>		Date: <i>2-15-01</i> Time: <i>10:30AM</i>		Received By: 		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #:	
Relinquished By: 		Date: <i>02/15/2001</i> Time: <i>4:55P</i>		Received By: (Lab Staff) <i>[Signature]</i>		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Fax #:	
Delivered By: (Circle One) Sampler - UPS - Bus - Other:				Sample Condition Cool Intact <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> No		CHECKED BY: (Initials)	
REMARKS:							

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

33000

• 4, 5, 6

4-9

AFE-692

TIME: AM/PM

DRIVER NO.:

1942

00751
2019-1 0.8374
1151-209

Completion Fluids

[] Completion Fluids

[] C-117 No.: _____

☐ BS&W Content: _____

Description: 2.2.2.2

VOLUME OF MATERIAL [] BBLs. _____ : [~~2~~] YARD 12 : [] _____

ALSO AS A CONDITION TO SUNDANCE SERVICES, INC.'S ACCEPTANCE OF THE MATERIALS SHIPPED WITH THIS JOB TICKET, TRANSPORTER REPRESENTS AND WARRANTS THAT ONLY THE MATERIAL DELIVERED BY OPERATOR/SHIPPER TO TRANSPORTER IS NOW DELIVERED BY TRANSPORTER TO SUNDANCE SERVICES, INC.'S FACILITY FOR DISPOSAL.

THIS WILL CERTIFY that the above Transporter loaded the material represented by this Transporter Statement at the above described location, and that it was tendered by the above described shipper. This will certify that no additional materials were added to this load, and that the material was delivered without incident.

DRIVER: _____
(SIGNATURE)

FACILITY REPRESENTATIVE: _____
(SIGNATURE)

White-Sundance Canary-Sundance Acct#1 Pink-Sundance Acct#2 Gold-Transporter
Revised 12/27/95



Current Photodocumentation

RICE *Operating Company* (ROC)

112 West Taylor Hobbs, NM 88240

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

EME J-9

UL/J, Section 9, T20S, R37E



Facing north

2/18/2013



Facing east

2/18/2013