

1R - 427-346

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, April 01, 2013 5:39 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 (1R427-346) Termination - ROC EME L-15 EOL Site

**RE: Termination Request
for the Rice Operating Company's
EME L-15 EOL Site
Unit Letter L, Section 15, T21S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-346) 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 18, 2013 (received March 21, 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 (1R427-346) 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 9293

RECEIVED

March 18, 2013

MAR 21 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 L-15 EOL (1R427-346): UL/L, 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 2010, ROC initiated work on the former L-15 EOL junction box. The site is located in UL/L, 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 5x3x8 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 8 ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of <16 mg/kg, a concentration of gasoline range organics (GRO) below detectable limits and a diesel range organics (DRO) concentration of 1,810 mg/kg. The excavated soil was returned to the excavation and contoured to the surrounding area. On 12/3/2010, the site was seeded with a blend of native vegetation. A junction box is no longer needed at the site.

On 2/22/2013, RECS personnel were on site to seed the surrounding area. The site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate. The site has been seeded and vegetation will inhibit the downward migration of constituents to groundwater. Vegetation will act as an evapo-

transpiration barrier in that plants capture water through their roots and so reduce the amount of water infiltrating below the root zone.

The junction box site location map, final report, photodocumentation, laboratory analysis, PID sheet, chloride graph, revegetation form and seeding 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



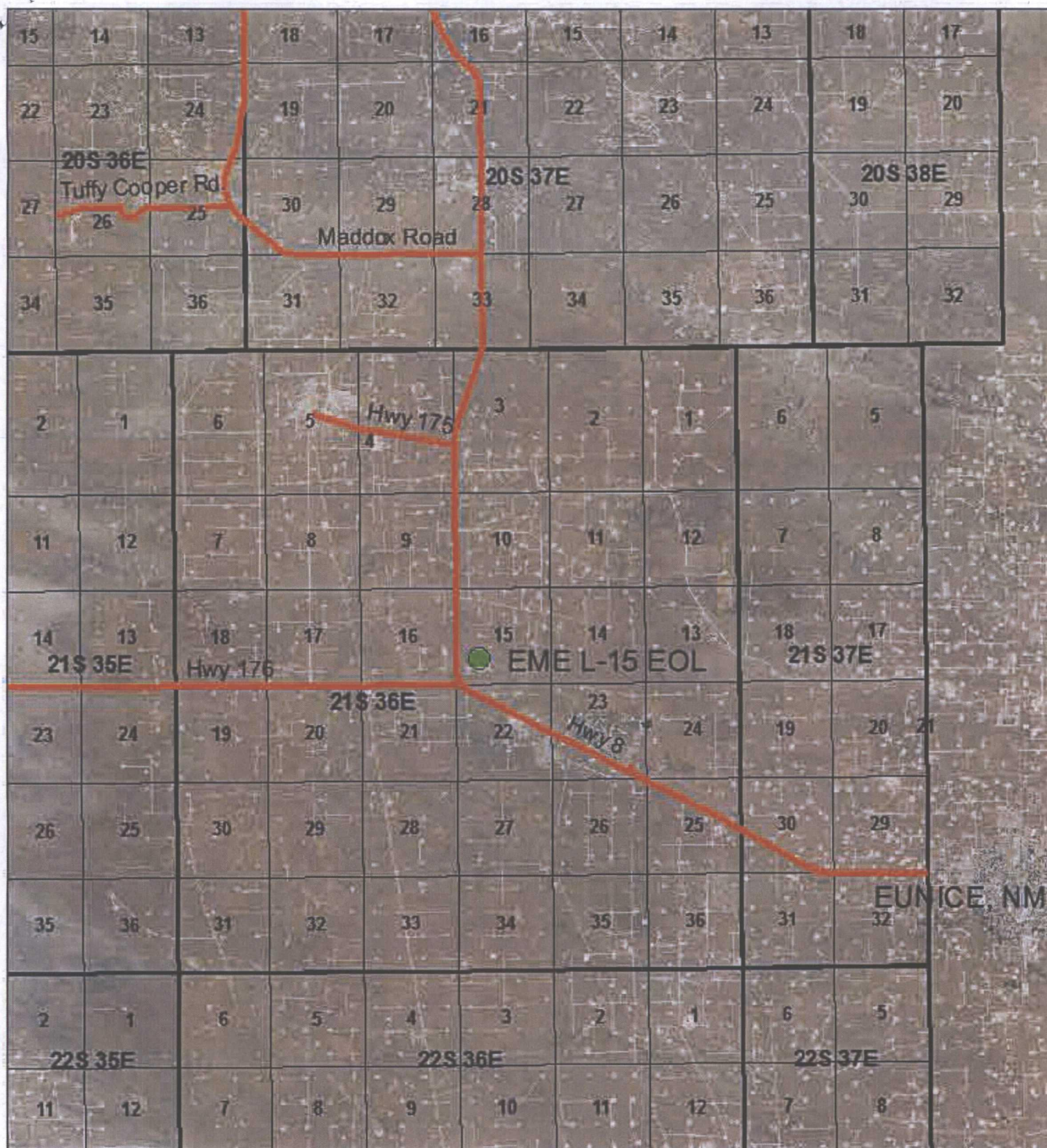
Hack Conder
Environmental Manager

enclosures

RECEIVED OCD
2013 MAR 21 P 2:19

Site Location Map

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



EME L-15 EOL

UL L SECTION 15
T-21-S R-36-E
LEA COUNTY, NM



0 1 2
Miles

Drawing date: 1/23/13
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	L-15 EOL	L	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: 0

Date Started 6/25/2010 Date Completed 6/25/2010 OCD Witness No

Soil Excavated 4.4 cubic yards Excavation Length 5 Width 3 Depth 8 feet

Soil Disposed 0 cubic yards Offsite Facility N/A Location N/A

FINAL ANALYTICAL RESULTS: Sample Date 6/25/2010 Sample Depth 8 FT

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

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
Source @ 8'	1.7	<10.0	1810	<16

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
background	6"	59
Vertical delineation at the junction (source)	3'	59
	4'	57
	5'	56
	6'	56
	7'	55
	8'	58

General Description of Remedial Action: This junction and line were 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 5x3x8-ft-deep excavation. Chloride field tests were performed on each sample which yielded low concentrations. Organic vapors, measured using a PID, yielded low concentrations of organic vapors. Laboratory analysis 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 12/03/2010, 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 curve

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

SITE SUPERVISOR Joe Gatts SIGNATURE Not Available COMPANY Rice Operating Company

REPORT ASSEMBLED BY Larry Bruce Baker Jr. INITIAL LBB

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

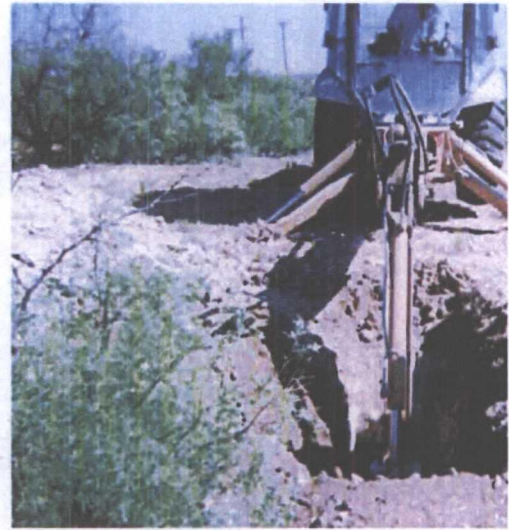
EME L-15 EOL

UNIT L SEC. 15 T21S R36E



SITE PRIOR TO EXCAVATION

6/25/10

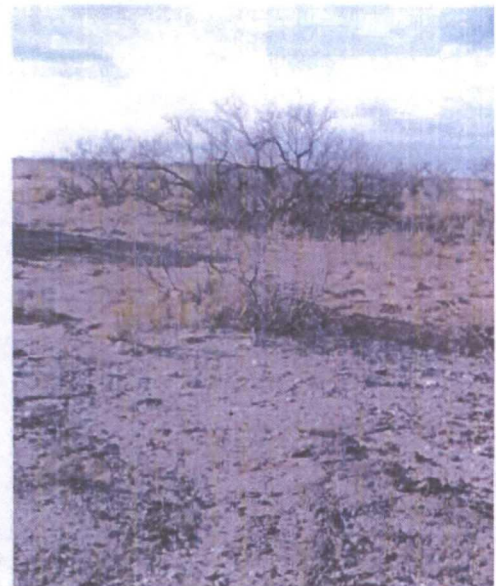


DELINEATION TRENCH BEING EXC.



SEEDING SITE

12/3/10



SITE COMPLETE



ARDINAL LABORATORIES

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

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

Receiving Date: 06/25/10
Reporting Date: 06/30/10
Project Number: NOT GIVEN
Project Name: NOT GIVEN
Project Location: EME L-15 EOL 21/36

Sampling Date: 06/25/10
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: JH
Analyzed By: AB/HM/CK

LAB NUMBER	SAMPLE ID	GRO	DRO	CI*
		(C ₆ -C ₁₀) (mg/kg)	(>C ₁₀ -C ₂₈) (mg/kg)	(mg/kg)

ANALYSIS DATE	06/29/10	06/29/10	06/29/10
H20225-1 SOURCE @ 8'	<10.0	1,810	< 16
Quality Control	503	567	500
True Value QC	500	500	500
% Recovery	101	113	100
Relative Percent Difference	2.6	6.9	< 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.

COPY

Chemist

Date

H20225 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 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. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



101 East Marland, Hobbs, NM 88240

(575) 393-2326 FAX (575) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS

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Relinquished By: <i>Joe Scott</i>		Date: _____	Received By: _____	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #: _____
		Time: _____		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Fax #: _____
Relinquished By: _____		Date: <i>6/25/10</i>	Received By: <i>Jodi Benson</i>	REMARKS: <i>Email All</i>
		Time: <i>16:50</i>		
Delivered By: (Circle One)		Sample Condition		CHECKED BY: (Initials)
Sampler - UPS - Bus - Other: _____		Cool <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<i>JB</i>

FORM-006
Revision 1.0

† Cardinal cannot accept verbal changes. Please fax written changes to 575-393-2476

#26

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
Model: PGM 7300
Model: PGM 7300

Serial No: 590-000183
Serial No: 590-000508
Serial No: 590-000504

Model: PGM 7600
Model: PGM 7600
Model: PGM 7230

Serial No: 110-023920
Serial No: 110-013744
Serial No: 592-903318

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 928547	EXPIRATION DATE: 2/04/13
FILL DATE:	METER READING ACCURACY: 100.1

ACCURACY : +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	L-15 E01	L	15	21	36

SAMPLE ID	PID	SAMPLE ID	PID
Background @ 6"	0.1		
Source @ 3'	1.3		
4'	0.1		
5'	0.1		
6'	0.1		
7'	1.9		
8'	1.7		

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

SIGNATURE:

Jim Galt

DATE:

6/25/10

CHLORIDE CONCENTRATION CURVE

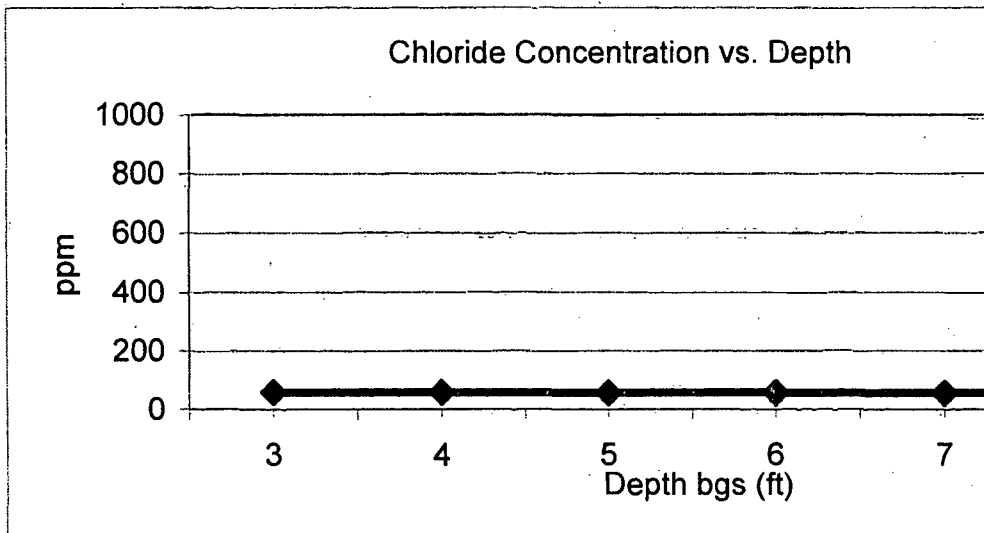
EME L-15 EOL

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

Delineation of Source

Depth bgs (ft)	[Cl] ppm
3	59
4	57
5	56
6	56
7	55
8	58

Groundwater = 195 ft





Revegetation Form and Photodocumentation

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



PO Box 5630
Hobbs, NM 88241
Phone: (575) 393-4411
Fax: (575) 393-0293

REVEGETATION FORM

1. General Information

Site name: EME L-15 EOL						
U/L L	Section 15	Township T-21-S	Range R-36-E	County Lea	Latitude N 32°28'30"	Longitude W103°15'27"
Contact Name: Hack Conder						
Email: hconder@riceswd.com						
Site size: 400		square feet		Map detail of site attached <input type="checkbox"/>		
Additional information:						

2. Soils

**Do not rip caliche subsoils; caliche rocks brought to the surface by ripping shall be removed.*

Salvaged from site <input checked="" type="checkbox"/>	Bioremediated <input type="checkbox"/>	Imported <input type="checkbox"/>	Blended <input type="checkbox"/>	Depth (in):	
Texture:		Describe soil & subsoil:			
Soil prep methods:	Rip <input type="checkbox"/>	Depth(in):	Disc <input type="checkbox"/>	Depth (in):	Rollerpack <input type="checkbox"/>
Date completed: 6/25/2010					

3. Bioremediation

Fertilizer <input type="checkbox"/>	Hay <input type="checkbox"/>	Other <input type="checkbox"/>
Type:		Describe:
Lbs/acre:		

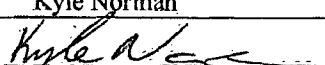
4. Seeding

**Attach seed bag tags to this form. Seed bag tags shall contain the site name and S-T-R.*

Custom seed mix <input checked="" type="checkbox"/>	Prescribed mix <input type="checkbox"/>	Seed mix name: 1 lbs. Lea Co. Mix/1 lbs. Side Oats/1 lbs. Winter Wheat	Seeding date: 2/22/2013
Broadcast <input checked="" type="checkbox"/>			
Method: Hand Broadcast			
Soil conditions during seeding: Dry <input checked="" type="checkbox"/> Damp <input type="checkbox"/> Wet <input type="checkbox"/>			
Photos attached <input type="checkbox"/>	Observations:		
Number of photos:	Raked the seed into the soil.		

5. Certification

I hereby certify that the information in this form and attachments is true and complete to the best of my knowledge and belief.

Name: Kyle Norman	Title: Environmental Tech	Date: 2/22/13
Signature: 		

EME L-15 EOL

Unit L, Section 15, T21S, R36E



Site prior to seeding, facing east

2/22/2013



Seeding site, facing north

2/22/2013



Raking in seed, facing northeast

2/22/2013



Site completed, facing northeast

2/22/2013