

1R - 427-307

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, April 17, 2013 6:20 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 (1R427-307) Termination - ROC EME Jct F-19 EOL Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct F-19 EOL Site
Unit Letter F, Section 19, T20S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-307) 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 April 5, 2013 (received April 9, 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 (1R427-307) 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 9330

RECEIVED

April 5, 2013

APR 9 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. F-19 EOL (1R427-307): UL/F, Sec. 19, 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 2009, ROC initiated work on the former F-19 EOL junction box. The site is located in UL/F, Sec. 19, T20S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 32 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 10x10x12 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 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 and gasoline range organics (GRO) concentration below detectable limits and a diesel range organics (DRO) of 11.4 mg/kg. The bottom sample resulted in a chloride and GRO concentration below detectable limits and a DRO concentration of 38.0 mg/kg. The blended backfill sample resulted in chloride, GRO and DRO concentrations below detectable limits. The blended backfill was returned to the excavation and contoured to the surrounding area. On February 13, 2009, the site was seeded with a blend of native vegetation. A junction box is no longer needed at the site. The site is adjacent to a lease pad and reseeded of the site is not necessary.

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

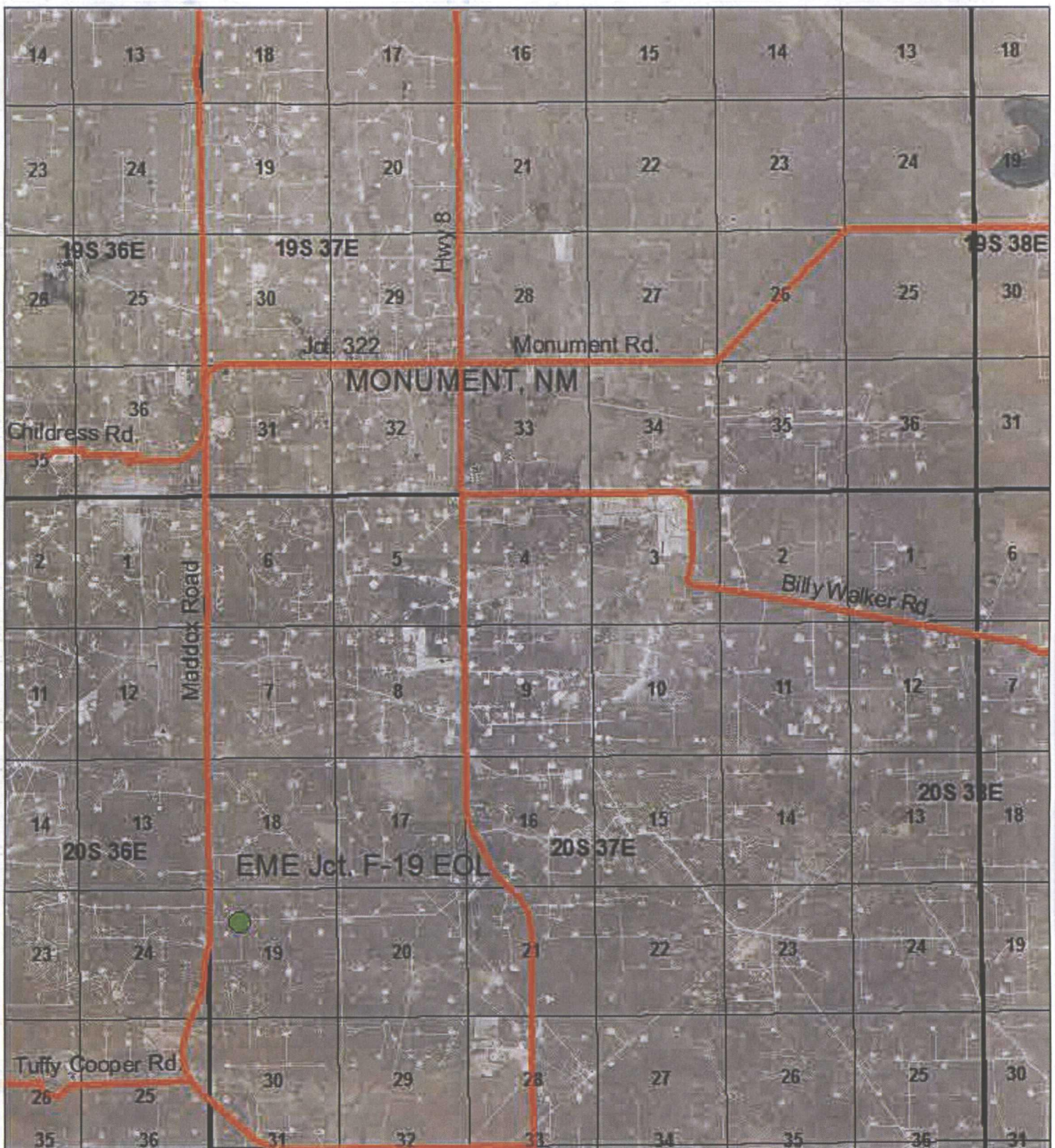
enclosures

RECEIVED OCD
2013 APR -9 P 2:48



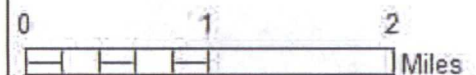
Site Location Map

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



EME Jct. F-19 EOL

UL F SECTION 19
T-20-S R-37-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		
Burice Monument Eumont (EME)	Jct. F-19 EOL	F	19	20S	37E	Lea	Length	Width	Depth
							eliminated		

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

Depth to Groundwater 32 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 1/9/2009 Date Completed 2/10/2009 OCD Witness no

Soil Excavated 44 cubic yards Excavation Length 10 Width 10 Depth 12 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 1/13/2009 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 NMOCD guidelines.

CHLORIDE FIELD TESTS

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
4-WALL COMP	0.0	<10.0	11.4	<16
BOTTOM COMP	0.1	<10.0	38.0	<16
BLENDED BACKFILL	3.1	<10.0	<10.0	<16

LOCATION	DEPTH	mg/kg
4-wall comp.	n/a	141
bottom comp.	12'	173
blended backfill	n/a	180
background	6"	145
vertical delineation trench at 5 ft East of the junction (source)	1'	149
	2'	152
	3'	154
	4'	142
	5'	146
	6'	175
	7'	148
	8'	200
	9'	199
	10'	176
	11'	171
	12'	151

General Description of Remedial Action: This junction box 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 10x10x12-ft-deep excavation. Chloride field tests were performed on each sample, which yielded low concentrations. Organic vapors were measured using a PID, which also yielded low concentrations. Representative composite samples were collected from the excavation walls, bottom, and the excavated soil. The representative samples were sent to a commercial laboratory for analysis of chloride and TPH, which confirmed low concentrations. The excavated soil was then returned to the excavation to ground surface and contoured to the surrounding area. On 2/13/2009, 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 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 [Signature] COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Katie Jones INITIAL KJ

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE [Signature] DATE 5-7-09

EME Jct. F-19 EOL

Unit F, Section 19, T20S, R37E



site prior to excavation, facing northwest

1/9/2009



collecting a soil sample, facing south

1/12/2009



final 10x10x12-ft excavation, facing northwest

2/10/2009



seeding backfilled site, facing east

2/13/2009



CARDINAL LABORATORIES

PHONE (505) 503-2118 • 401 E. MAPLANIT • HOBBBS, NM 88240

ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: JORDAN WOODFIN
122 W TAYLOR
HOBBBS, NM 88240

Receiving Date: 01/13/09
Reporting Date: 01/19/09
Project Number: NOT GIVEN
Project Name: EME JCT-F-19 EOL
Project Location: EME JCT-F-19 EOL

COPY

Sampling Date: 01/13/09
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: ML
Analyzed By: AB/HM

LAB NUMBER	SAMPLE ID	GRO (C ₂ -C ₁₀) (mg/kg)	DRO (C ₁₀ -C ₂₀) (mg/kg)	Cl: (mg/kg)
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ANALYSIS DATE	01/17/09	01/17/09	01/14/09
H16678-1 BACKFILL	<10.0	<10.0	<16
H16678-2 4 WALL COMP	<10.0	38.0	<16
H16678-3 5PT. BOTTOM COMP	<10.0	11.4	<16
Quality Control	425	461	490
True Value QC	500	500	500
% Recovery	85.0	92.2	98.0
Relative Percent Difference	8.9	15.2	2.0

METHODS: TPH GRO & DRO: EPA SW-846-8015 M; Cl: Sig Methods 4500-Cl B
Analyses performed on 1:4 w/v aqueous extracts.

[Signature]
Chemist

[Signature]
Date: 01/19/09

H16678 TCL RICE

Cardinal Laboratories, Inc. is a service company that provides analytical services to its clients. The company is not responsible for the accuracy or completeness of the data presented herein. The data is provided for informational purposes only and should not be used for legal or regulatory purposes. The company is not responsible for the accuracy or completeness of the data presented herein. The data is provided for informational purposes only and should not be used for legal or regulatory purposes.



CARDINAL LABORATORIES

101 East Mallard, Hobbs, NM 88240 2111 Greenwood, Abilene, TX 79603
(505) 341-2126 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: RUE OPERATING				BILL TO:				ANALYSIS REQUEST			
Project Manager: JORDAN WOODFIN				Project:				<div style="text-align: center; font-size: 2em; opacity: 0.5;">COPY</div>			
Address: 122 W. TR/LOIL				Company:							
City: ABILENE		State: NM		Zip: 89240		Alt:					
Phone: 513-9124		Fax:		Address:		City:					
Project #:		Project Owner:		State:		Zip:					
Project Name: EME SGT F-19 EOL		Project Location: EME SGT F-19 EOL		Phone #:		Fax #:					
Samples: JORDAN WOODFIN											

Lab ID	Sample ID	CONTAINER	MATRIX						PRESERV		SAMPLING		DATE	TIME	X	X
			GLASS	PLASTIC	WAX	OTHER	OTHER	OTHER	OTHER	OTHER	OTHER	OTHER				
1	Base Fill	1											1-11-09	12:44	X	X
2	Wall Comp	1											1-11-09	12:12	X	X
3	SGT Bottom Comp	1											1-11-09	10:02	X	X

Relinquished By: JORDAN WOODFIN	Date: 1-13-09	Received By: Mike R. But	Phone Record: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Fax Record: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Relinquished By:	Date:	Received By:	Phone Record: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Fax Record: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Relinquished By: (Circle One) Sample #1115 - One - Other	Sample Condition: Cool <input type="checkbox"/> Warm <input type="checkbox"/> Sealed <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Checked By: MB	EMAIL RESULTS TO: BBAKER@Riceswd.com CEJPURVIS@Riceswd.com CEJWoodfin@Riceswd.com	

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

123 Main Street, New York, NY 10001
 Phone: (212) 555-1234 Fax: (212) 555-5678
 E-mail: info@company.com Web: www.company.com

MODEL: PCIM 7300
MODEL: PCIM 7400
MODEL: PCIM 7500
MODEL: PCIM 7600

SERIAL NO. 590-000110
SERIAL NO. 110-013500
SERIAL NO. 110-12221
SERIAL NO. 110-121834

COPY

~~ALL COMPOSITE IDENTIFICATION NUMBER BALANCE~~

INSTR. NO. 20442 07-3353	ESTIMATION DATE 4-12-09
INSTR. DATE 10-12-07	METER READING ACCURACY 98.7

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
EME	F-19 EOL	F	19	208	37E

[illegible]

It is only if a policy calling for the proper treatment is made change to the national level.

W44342A-770

Jason Wood

4417 2-13-89

CHLORIDE CONCENTRATION CURVE

RICE Operating Company

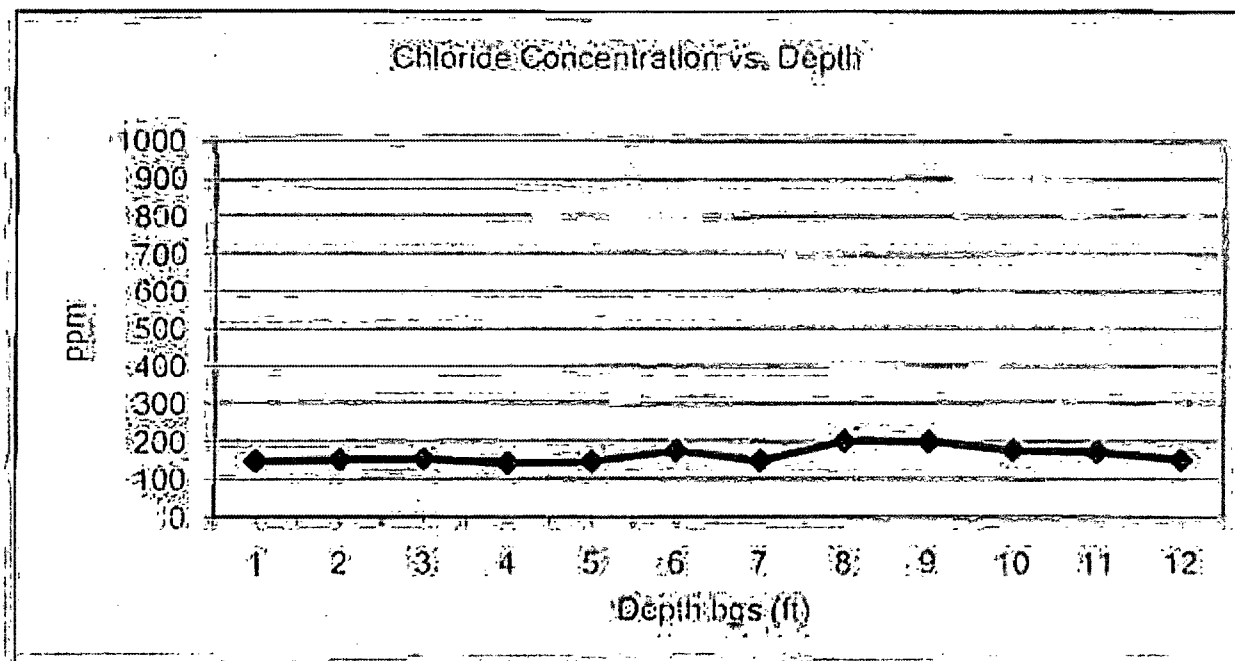
EME Jct. F-19 EOL

Unit F, Sec. 19, T20S, R37E

Backhoe samples at 5 ft East of the junction (source)

Depth bgs (ft)	[Cl ⁻] ppm
1	149
2	152
3	154
4	142
5	116
6	175
7	148
8	200
9	199
10	176
11	171
12	151

Groundwater = 32 ft





Current Photodocumentation

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

EME Jct. F-19 EOL
UL/F, Section 19, T20S, R37E



Facing west

2/22/2013



Facing east

2/22/2013