

1R - 427-364

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, May 06, 2013 1:11 PM
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); sharon.hall@arcadis-us.com
Subject: Remediation Plan (1R427-364) Termination - ROC EME I-7 EOL Site

**RE: Corrective Action Plan Report and Termination Request
for the Rice Operating Company's
EME I-7 EOL Site
Unit Letter I, Section 7, T19S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-364) 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 19, 2013 (received April 24, 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 (1R427-364) 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

APR 22 2013

Sent Certified Mail
Return Receipt No. 7002 2410 0001 5813 4293

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

ARCADIS U.S., Inc.
1004 North Big Spring Street
Suite 300
Midland
Texas 79701
Tel 432.687.5400
Fax 432.687.5401
www.arcadis-us.com

Mr. Ed Hansen
New Mexico Energy, Minerals, & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

Environmental

Subject:

**Corrective Action Plan (CAP) Report and Termination Request
EME I-7 EOL
Unit I, SEC. 7, T19S, R37E, Monument, Lea County, New Mexico
NMOCD CASE # 1R427-364**

Date:
April 19, 2013

Mr. Hansen:

Contact:
Sharon Hall

RICE Operating Company (ROC) has retained ARCADIS U.S., Inc. (ARCADIS) to address potential environmental concerns at the above-referenced site. On behalf of ROC, ARCADIS respectfully submits this Corrective Action Plan (CAP) Report and Termination Request for the above-referenced site.

Phone:
432.687.5400

Email:
sharon.hall@arcadis-us.com

Our ref:
MT001107.0001

According to the ICP, approved by the NMOCD on July 25, 2012, five soil borings (SB-1 through SB-5) were drilled at the site on July 9, 2012. Soil boring SB-1 was advanced at the former junction box location and four soil borings were advanced 16 feet west (SB-2), 11 feet south (SB-3), 12 feet north (SB-4) and 12 feet east (SB-5) of the former junction box location.

ARCADIS U.S., Inc.
TX Engineering License # F-533

The soil borings were drilled to depth of 20 feet below ground surface (bgs), and groundwater is located at a depth of approximately 35 ft bgs. Soil samples were collected every five feet and analyzed in the field for chlorides using field-adapted Method 4500-Cl-B and screened in the field using a photoionization detector. Two samples from each boring were submitted to Cardinal Laboratories and analyzed for chlorides, gasoline range organics (GRO) and diesel range organics (DRO). Chloride concentrations were low throughout the site, with the 20 ft sample in each bore being below 176 mg/kg. GRO was not detected in any of the soil boring samples. DRO was detected in SB-1 at 5 feet bgs (17.2 mg/kg) and at 20 feet bgs

(10.7 mg/kg) and in SB-3 at 20 feet bgs (24.8 mg/kg). DRO was not detected in soil samples collected from SB-2, SB-4 and SB-5.

An Investigation and Characterization Plan (ICP) Report and CAP was submitted on October 18, 2012 and approved by New Mexico Oil Conservation Division on October 22, 2012. The approved plan proposed that large rocks be removed and the site be seeded with native vegetation, with the addition of soil amendments as needed.

According to the ICP Report and CAP, the site was scraped to a depth of approximately 6 inches below ground surface and 24 cubic yards of topsoil was placed at the site. A composite sample of the imported topsoil was analyzed by a commercial laboratory, resulting in a chloride concentration of 16.0 mg/kg, and a DRO/GRO concentration below detectable limits. A PID field reading of that composite sample resulted in a reading of 1.9 ppm. The site was leveled, raked and seeded with blue grama grass and winter wheat. A total of 60 yards of excavated soils were exported to Sundance Services for disposal. Photographs of site activities, the revegetation form, laboratory analysis and a photoionization detector reading of the topsoil are attached.

ROC acknowledges they have met the requirements of 19.15.29 NMAC, and respectfully requests termination of the regulatory file. There are no monitoring wells located at this site.

ROC is the service provider (agent) for the EME 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.

Thank you for your consideration concerning this CAP Report and Termination Request. If you have any questions, do not hesitate to contact Hack Conder or me.

Sincerely,

ARCADIS U.S., Inc.

Sharon E. Hall

Sharon E. Hall

RECEIVED OCD
2013 APR 24 P 2:33
Page: 2/3

ARCADIS

Mr. Ed Hansen
April 19, 2013

Associate Vice President

Copies:
Hack Conder, ROC

Attachments:

Photographs
Revegetation Form
Laboratory Analysis of Topsoil
Topsoil PID Reading

EME I-7 EOL (1R427-364)
Unit Letter I, Section 7, T19S, R37E



Site prior to excavation, facing north
5/7/2012



Scraping the site, facing east
11/19/2012



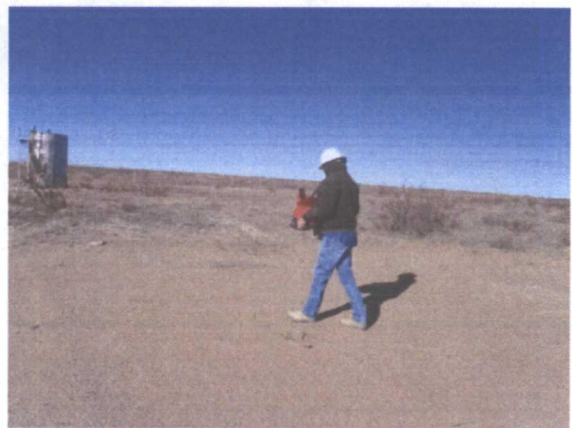
Scraping the site, facing west
11/19/2012



Exporting the scraped soil, facing southwest
11/19/2012



Backfilling the scraped area with clean,
imported topsoil, facing west
12/12/2012



Seeding site, facing north
12/17/2012



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

REVEGETATION FORM

1. General Information

Site name: EME I-7 EOL						
U/L 1	Section 7	Township 19S	Range 37E	County LEA	Latitude 32°40'22.88"N	Longitude 103°17'6.30"W
Contact Name: ZACHARY CONDER						
Email: zconder@rice-ecs.com						
Site size: 53x43 Square feet: 2,279				Map detail of site attached <input type="checkbox"/>		
Additional information:						

2. Soils

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

Salvaged from site <input type="checkbox"/>	Bioremediated <input type="checkbox"/>	Imported <input checked="" 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):	Roller pack <input type="checkbox"/>
Date completed: 12-12-2012					

3. Bioremediation

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

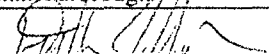
4. Seeding

**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: 3 LBS. BLUE GRAMA, 2 LBS. WINTER RYE
Seeding date: 12-17-2012		
Broadcast <input checked="" type="checkbox"/>		
Method: MECHANICAL HAND SEEDER		
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:		

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: Dyllan Yarbrough	Title: Environmental Tech	Date: 12-17-2012
Signature: 		

November 27, 2012

Hack Conder

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: EME I-7 EOL (19/37)

Enclosed are the results of analyses for samples received by the laboratory on 11/19/12 16:44.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

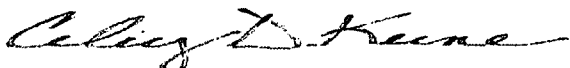
Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

 Rice Operating Company
 Hack Conder
 112 W. Taylor
 Hobbs NM, 88240
 Fax To: (575) 397-1471

 Received: 11/19/2012
 Reported: 11/27/2012
 Project Name: EME I-7 EOL (19/37)
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 11/19/2012
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

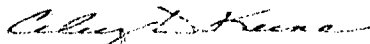
Sample ID: TOP SOIL (H202820-01)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	11/27/2012	ND	416	104	400	3.77	
TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	11/21/2012	ND	185	92.3	200	7.60	
DRO >C10-C28	<10.0	10.0	11/21/2012	ND	191	95.6	200	9.02	
Surrogate: 1-Chlorooctane		86.7 %	65.2-140						
Surrogate: 1-Chlorooctadecane		98.1 %	63.6-154						

Cardinal Laboratories

*=Accredited Analyte

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 the 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.



Celey D. Keene, Lab Director/Quality Manager

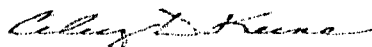
Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C
	Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



Company Name: KICE Project Manager: Address: City: State: Zip: Phone #: Fax #: Project #: Project Owner: Project Name: Project Location: ENE I-76-L Sampler Name:		BILL TO P.O. #: Company: Attn: Address: City: State: Zip: Phone #: Fax #: ANALYSIS REQUEST	
FOR LAB USE ONLY Lab I.D. H202820 Sample I.D. Top Soil	# CONTAINERS 1	MATRIX GROUNDWATER WASTEWATER SOIL OIL SLUDGE OTHER: ACID/BASE: ICE/COL: OTHER:	PRESERV DATE 11/14/12 TIME 11:35

PLEASE NOTE: *Wakely and Partners, its clients' liability and their's actions remain for any claim arising whether based in contract or in tort, shall be limited to the amount paid by the client for the services. All claims relating to any negligence or any other cause of action shall be deemed waived and shall include a waiver and release by the client of any and all claims or damages of any kind, whether in contract or in tort, arising out of or from the use of the services, in any event shall be deemed to be limited to the amount paid by the client for the services, in any event shall be deemed to be limited to the amount paid by the client for the services, in any event shall be deemed to be limited to the amount paid by the client for the services.*

Relinquished By: <i>[Signature]</i>		Date: <i>11/14/12</i>	Received By: <i>[Signature]</i>	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Adult Phone #: _____
Relinquished By: <i>[Signature]</i>		Date: <i>11/14/12</i>	Received By: <i>[Signature]</i>	Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Adult Fax #: _____
Delivered By: (Circle One) Sampler - UPS - Bus - Other: _____		Sample Condition: Cool / Intact / Yes / No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	CHECKED BY: <i>[Signature]</i>	REMARKS: <i>Hack Corder Laura V</i> <i>Zach Corder Laura Pence</i> <i>Bruce Baker Amy Ruth</i>	

† Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326

RICE ENVIRONMENTAL CONSULTING & SAFETY

122 West Taylor Hobbs, NM 88240
PHONE: (505) 393-9174 FAX: (505) 397-1471
PID METER CALIBRATION & FIELD REPORT FORM

CK.
MODEL
NO.

X

MODEL: PGM 7300	SERIAL NO: 590-000508
MODEL: PGM 7300	SERIAL NO: 590-000504
MODEL: PGM 7320	SERIAL NO: 592-903318
MODEL: PGM 7300	SERIAL NO: 590-000183

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: HAL-248-100-1	EXPIRATION DATE: 7/1/2015
METER READING ACCURACY: 100	

ACCURACY : +/- 2%

COMPANY
RICE OPERATING

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	I-7 EOL	I	7	T-19-S	R-37-E

[illegible]

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

SIGNATURE:

DATE: 11/19/2012