

1R - 427-114

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, May 08, 2013 2:18 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)
Subject: Remediation Plan (1R427-114) Termination - ROC EME P-36-2 Site

**RE: Termination Request
for the Rice Operating Company's
EME P-36-2 Site
Unit Letter P, Section 36, T19S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-114) 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 11, 2013 (received April 12, 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 (1R427-114) 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 9347

April 11, 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

RE: Termination Request
EME P-36-2 (1R427-114): UL/P, Sec. 36, T19S, R36E
RICE Operating Company – Eunice Monument Eumont SWD System

RECEIVED OGD
2013 APR 12 P 1:22

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 P-36-2 junction box. The site is located in UL/P, Sec. 36, T19S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 50 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 12x10x15 ft deep excavation. Each sample was field titrated for chlorides, resulting in slightly elevated chloride concentrations. Representative samples were collected from the excavation bottom and sent to a commercial laboratory for analysis. The bottom composite sample resulted in a chloride concentration of 1,070 mg/kg and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The sample was also analyzed for BTEX, resulting in a concentration below detectable limits for benzene and ethyl benzene, 0.016 mg/kg for toluene and 0.038 mg/kg for total xylenes. A total for 32 cubic yards of excavated soil was properly disposed of at a NMOCD facility. A compacted clay liner was installed and the excavation was backfilled with clean imported soil and a new, watertight junction was installed at the site.

To further investigate the depth of chloride presence, a soil bore was initiated on May 2, 2001. The boring was advanced to a total depth of 20 ft with soil samples collected at

regular intervals, resulting in a chloride concentration that decreased with depth. The 20 ft sample was sent to a commercial laboratory for analysis, resulting in a chloride concentration of 186 mg/kg, a GRO concentration below detectable limits, and a DRO concentration of 12.6. The sample was also analyzed for BTEX, resulting in concentrations below detectable limits throughout.

Since the site is located next to a lease road, seeding is not required. A new, watertight junction was installed at the site.

The junction box site location map, final report, laboratory analysis, soil bore log, 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.

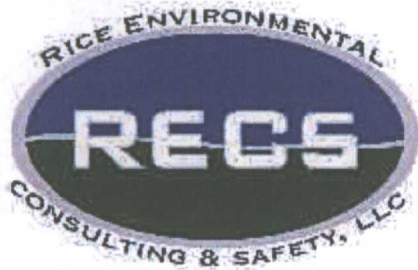
Hack Conder
Environmental Manager

enclosures



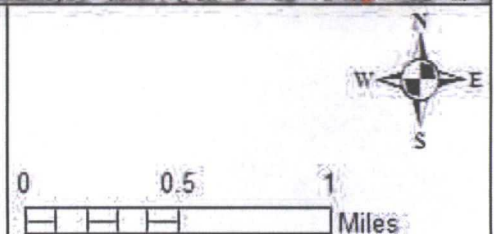
Site Location Map

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



EME P-36-2 (1R427-114)

Unit Letter P, Section 36,
T19S, R36E
Lea County, NM



Drawing date: 3/19/13

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	P-36-2	P	36	19S	36E	LEA	Length 6	Width 5	Depth 5

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER Chevron USA, Inc. OTHER _____

Depth to Groundwater <50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 04/18/2001 Date Completed 5/07/01 OCD Witness NO

Soil Excavated 60 cubic yards Excavation Length 12 Width 10 Depth 15 feet

Soil Disposed 32 cubic yards Offsite Facility SUNDANCE Location EUNICE, NM

FINAL ANALYTICAL RESULTS: Sample Date 05/02/2001 Sample Depth 15'

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							
BOTTOM	<0.005	0.016	<0.005	0.038	<10	<10	1070
Boring @ 20'	<0.005	<0.005	<0.005	<0.015	<10	12.6	186

General Description of Remedial Action: The site was delineated vertically and laterally

finding chlorides above acceptable levels. A soil boring was completed and demonstrated impact
stopped before reaching groundwater. Chlorides declined from 19,100 ppm at 5' bgs to 186 ppm
at 20' bgs with no indications of TPH. The high impact soil was removed to a permitted facility
and fresh soil was blended to use for backfill. A compacted clay barrier and water tight
junction box was installed and backfilled. No wall composite was sent to the lab.

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS	11.5	528
BOTTOM	15	1100
Soil Boring	5'	19100
	10'	5924
	15'	1710
	20'	186

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

DATE December 13, 2001 PRINTED NAME D. E. Anderson
SIGNATURE  TITLE Project Leader - Environmental



ARDINAL LABORATORIES

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

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

ANALYTICAL RESULTS FOR
SAFETY & ENVIRONMENTAL SOLUTIONS, INC.
ATTN: BOB ALLEN
703 E. CLINTON, #103
HOBBS, NM 88240
FAX TO: (505) 393-4388

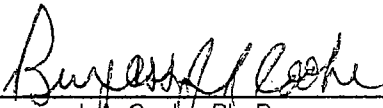
Receiving Date: 05/02/01
Reporting Date: 05/07/01
Project Number: NOT GIVEN
Project Name: RICE, BOXES
Project Location: N-36, P-36

Sampling Date: 05/02/01
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC/GP

LAB NUMBER	SAMPLE ID	TPH (mg/Kg)	Cl* (mg/Kg)	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE:		04/27/01	05/04/01	04/27/01	04/27/01	04/27/01	04/27/01
H5844-1	N-36-1 B.H. #1 15'	<10	2490	<0.005	0.007	<0.005	0.019
H5844-2	P-36 B.H. #1 15'	<10	1070	<0.005	0.016	<0.005	0.038
Quality Control		239	970	0.099	0.102	0.103	0.298
True Value QC		240	1000	0.100	0.100	0.100	0.300
% Recovery		97.5	97.0	99.0	102	103	99.3
Relative Percent Difference		3.6	1.0	6.3	1.4	5.8	6.2

METHODS: TRPHC-EPA 600/4-79-020 418.1; Cl-Std. Methods 4500-ClB; BTEX-EPA SW-846 8260

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


Burgess J. A. Cooke, Ph. D.

5/7/01
Date

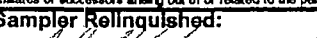




CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page ____ of ____

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 the client for the services. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 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.

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 collections, including attorney's fees.

Relinquished By: 		Date: _____ Time: _____		Received By: _____		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #: _____	
Relinquished By: _____		Date: 05/02/2001 Time: 440 P		Received By: (Lab Staff) 		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.



PHONE (915) 873-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

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

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ATTN: BOB ALLEN
703 E. CLINTON, #103
HOBBS, NM 88240
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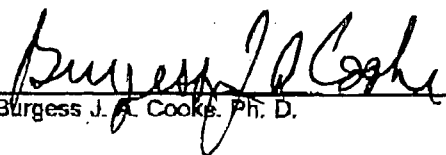
Receiving Date: 05/07/01
Reporting Date: 05/09/01
Project Number: NOT GIVEN
Project Name: RICE BOXES
Project Location: NOT GIVEN

Sampling Date: 05/07/01
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	TPH (mg/Kg)	CI* (mg/Kg)	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE:		05/08/01	05/08/01	05/08/01	05/08/01	05/08/01	05/08/01
H5853-1	P-36 BH #1-20'	12.6	186	<0.005	<0.005	<0.005	<0.015
Quality Control		239	970	0.105	0.106	0.108	0.308
True Value QC		240	1000	0.100	0.100	0.100	0.300
% Recovery		99.5	97.0	105	106	108	103
Relative Percent Difference		3.6	1.0	5.9	2.7	4.2	3.3

METHODS: TRPHC-EPA 800/4-79-020 418.1; CI-Std. Methods 4500-CIB; BTEX-EPA SW-846 8260

*Analysis performed on a 1:4 w/v aqueous extract.


Burgess J. A. Cooke, Ph. D.

5/18/01
Date

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 damages, 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 of

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**Safety & Environmental
Solutions, Inc.**

LOG OF BORING BH#1

(Page 1 of 1)

Rice Operating Company
Soil Assessment
P-36 Junction Box

Date Started : 05/02/01
Date Completed : 05/02/01
Hole Diameter : 4.0 in.
Drilling Method : Continuous Auger
Sampling Method : Thin Wall Sampler

Company Rep. : C. Haynes
Northing Coord. :
Easting Coord. :
Survey By : D. Whatley
Logged By : D. Whatley

Section 36, T19S, R36E
Lea County, New Mexico

Depth in Feet	USCS	GRAPHIC	DESCRIPTION	Lab No.	Samples	TPH (mg/Kg)	Benzene (mg/Kg)	Toluene (mg/Kg)	Ethyl Benzene (mg/Kg)	Total Xylenes (mg/Kg)	Chlorides (mg/Kg)
0											
5	SW-CA		0-5 ft. Sand and caliche	Field Test	1	6,000	NT	NT	NT	NT	19,100 204
10			5-10 ft. Sand and caliche	Field Test	2	230	NT	NT	NT	NT	5924 240
			10-12 ft. Sand and caliche								
	CHERT		12-14 ft. Bedded chert								
15	SP		14-15 ft. Red sand	Field Test	3	37	NT	NT	NT	NT	1710 508
	SW		15-18 ft. Red sand and gravel								
20	CL		18-20 ft. Red sandy clay	Field Test H5853-1	4 5	N/D 12.6	NT <0.005	NT <0.005	NT <0.005	NT <0.005	176 186

Sundance Services, Inc.

P.O. Box 1737 ★ Eunice, NM 88231
(505) 394-2511

39624

LEASE OPERATOR/SHIPPER/COMPANY: *1711*

LEASE NAME: ~~1711~~ *JCT P36-2 AFE-692*

TRANSPORTER COMPANY: *1711*

TIME: AM/PM

DATE: *11/11/11*

VEHICLE NO.:

DRIVER NO.:

CHARGE TO: *1711*

TYPE OF MATERIAL

- ☐ Production Water
☐ Tank Bottoms
☐ Other Material:

- ☐ Drilling Fluids
☐ Contaminated soil
☐ BS&W Content: _____

- ☐ Completion Fluids
☐ C-117 No.: _____

Description: *2/10*

VOLUME OF MATERIAL ☐ BBLS. : ☐ YARD *8* : ☐

AS A CONDITION TO SUNDANCE SERVICES, INC.'S ACCEPTANCE OF THE MATERIALS SHIPPED WITH THIS JOB TICKET, OPERATOR/SHIPPER REPRESENTS AND WARRANTS THAT THE WASTE MATERIAL SHIPPED HEREWITH IS MATERIAL EXEMPT FROM THE RESOURCE, CONSERVATION AND RECOVERY ACT OF 1976, AS AMENDED FROM TIME TO TIME, 40 U.S.C. § 6901, et seq., THE NM HEALTH AND SAF. CODE § 361.001, et seq., AND REGULATIONS RELATED THERETO, BY VIRTUE OF THE EXEMPTION AFFORDED DRILLING FLUIDS, PRODUCED WATERS, AND OTHER WASTE ASSOCIATED WITH THE EXPLORATION, DEVELOPMENT OR PRODUCTION OF CRUDE OIL OR NATURAL GAS OR GEOTHERMAL ENERGY.

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]*
(SIGNATURE)

FACILITY REPRESENTATIVE: *[Signature]*
(SIGNATURE)

Sundance Services, Inc.

P.O. Box 1737 ★ Eunice, NM 88231
(505) 394-2511

112 39019

LEASE OPERATOR/SHIPPER/COMPANY: Rice

LEASE NAME: ACE-692 ~~XXXX~~ ~~XXXX~~ Job # 86-2

TRANSPORTER COMPANY: Don't work

TIME:

AM/PM

DATE: 11-10-91

VEHICLE NO.: 13

DRIVER NO.:

CHARGE TO: Rice

TYPE OF MATERIAL

☐ Production Water

☐ Tank Bottoms

☐ Other Material:

☐ Drilling Fluids

☒ Contaminated soil

☐ BS&W Content: _____

☐ Completion Fluids

☐ C-117 No.: _____

Description: Oil

30036 T193 R360

VOLUME OF MATERIAL ☐ BBLs. _____ :

☐ YARD 12 :

☐ _____

AS A CONDITION TO SUNDANCE SERVICES, INC.'S ACCEPTANCE OF THE MATERIALS SHIPPED WITH THIS JOB TICKET, OPERATOR/SHIPPER REPRESENTS AND WARRANTS THAT THE WASTE MATERIAL SHIPPED HERewith IS MATERIAL EXEMPT FROM THE RESOURCE, CONSERVATION AND RECOVERY ACT OF 1976, AS AMENDED FROM TIME TO TIME, 40 U.S.C. § 6901, et seq., THE NM HEALTH AND SAF. CODE § 361.001, et seq., AND REGULATIONS RELATED THERETO, BY VIRTUE OF THE EXEMPTION AFFORDED DRILLING FLUIDS, PRODUCED WATERS, AND OTHER WASTE ASSOCIATED WITH THE EXPLORATION, DEVELOPMENT OR PRODUCTION OF CRUDE OIL OR NATURAL GAS OR GEOTHERMAL ENERGY.

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]

(SIGNATURE)

FACILITY REPRESENTATIVE: [Signature]

(SIGNATURE)

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

Sundance Services, Inc.

P.O. Box 1737 ★ Eunice, NM 88231
(505) 394-2511

ME 42769

LEASE OPERATOR/SHIPPER/COMPANY: _____

LEASE NAME: _____

TRANSPORTER COMPANY: _____

TIME: _____

AM/PM

DATE: 7/27/95

VEHICLE NO.: 1

DRIVER NO.: _____

CHARGE TO: _____

TYPE OF MATERIAL

☐ Production Water

☐ Tank Bottoms

☐ Other Material: _____

☐ Drilling Fluids

☒ Contaminated soil

☐ BS&W Content: _____

☐ Completion Fluids

☐ C-117 No.: _____

Description: _____

VOLUME OF MATERIAL ☐ BBLs. _____ :

☐ YARD 13.1 :

☐ _____

AS A CONDITION TO SUNDANCE SERVICES, INC.'S ACCEPTANCE OF THE MATERIALS SHIPPED WITH THIS JOB TICKET, OPERATOR/SHIPPER REPRESENTS AND WARRANTS THAT THE WASTE MATERIAL SHIPPED HERewith IS MATERIAL EXEMPT FROM THE RESOURCE, CONSERVATION AND RECOVERY ACT OF 1976, AS AMENDED FROM TIME TO TIME, 40 U.S.C. § 6901, et seq., THE NM HEALTH AND SAF. CODE § 361.001, et seq., AND REGULATIONS RELATED THERETO, BY VIRTUE OF THE EXEMPTION AFFORDED DRILLING FLUIDS, PRODUCED WATERS, AND OTHER WASTE ASSOCIATED WITH THE EXPLORATION, DEVELOPMENT OR PRODUCTION OF CRUDE OIL OR NATURAL GAS OR GEOTHERMAL ENERGY.

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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

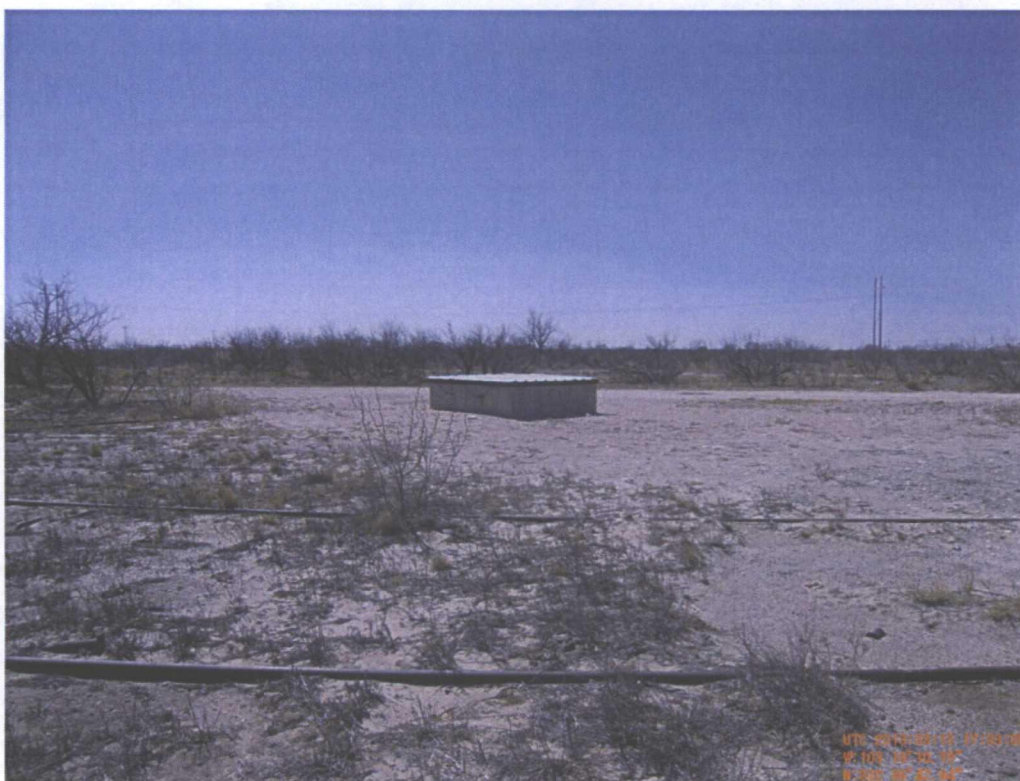
EME P-36-2

UL/P, Section 36, T19S, R36E



Facing north

3/13/2013



Facing south

3/13/2013