

1R - 427-34

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, May 30, 2013 3:46 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 (1R427-34) Termination - ROC EME I-9-1 Site

**RE: Termination Request
for the Rice Operating Company's
EME I-9-1 Site
Unit Letter I, Section 9, T21S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-34) 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 May 8, 2013 (received May 20, 2013) and additional information of May 30, 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 (1R427-34) 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*

122 West Taylor • Hobbs, New Mexico 88240

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

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 9231

RECEIVED

May 8, 2013

MAY 20 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 I-9-1 (1R427-34): UL/I, Sec. 9, 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 2003, ROC initiated work on the former I-9-1 junction box. The site is located in UL/I, Sec. 9, T21S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 200 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 30x14x12 ft deep excavation. Each sample was field titrated for chlorides, resulting in chloride concentrations that decreased with depth. Representative composite samples of the excavation walls, bottom and remediated backfill were sent to a commercial for analysis of chloride and TPH, resulting in a 4-wall chloride concentration of 144 mg/kg and concentrations of gasoline range organics (GRO) concentration and diesel range organics (DRO) below detectable limits. The bottom composite resulted in a chloride concentration of 592 mg/kg and concentrations of GRO and DRO below detectable limits. The remediated backfill resulted in a chloride concentration of 304 mg/kg and concentrations of GRO and DRO below detectable limits. The excavation was backfilled with the remediated soil to ground surface and contoured to the surrounding area. On 12/12/2003, the site was seed with a blend of native vegetation. A new, watertight junction was installed over the site; therefore, additional seeding is not required.

The junction box site location map, area map, final report, photodocumentation, laboratory analysis, field notes 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 long horizontal flourish extending to the right.

Hack Conder
Environmental Manager

enclosures

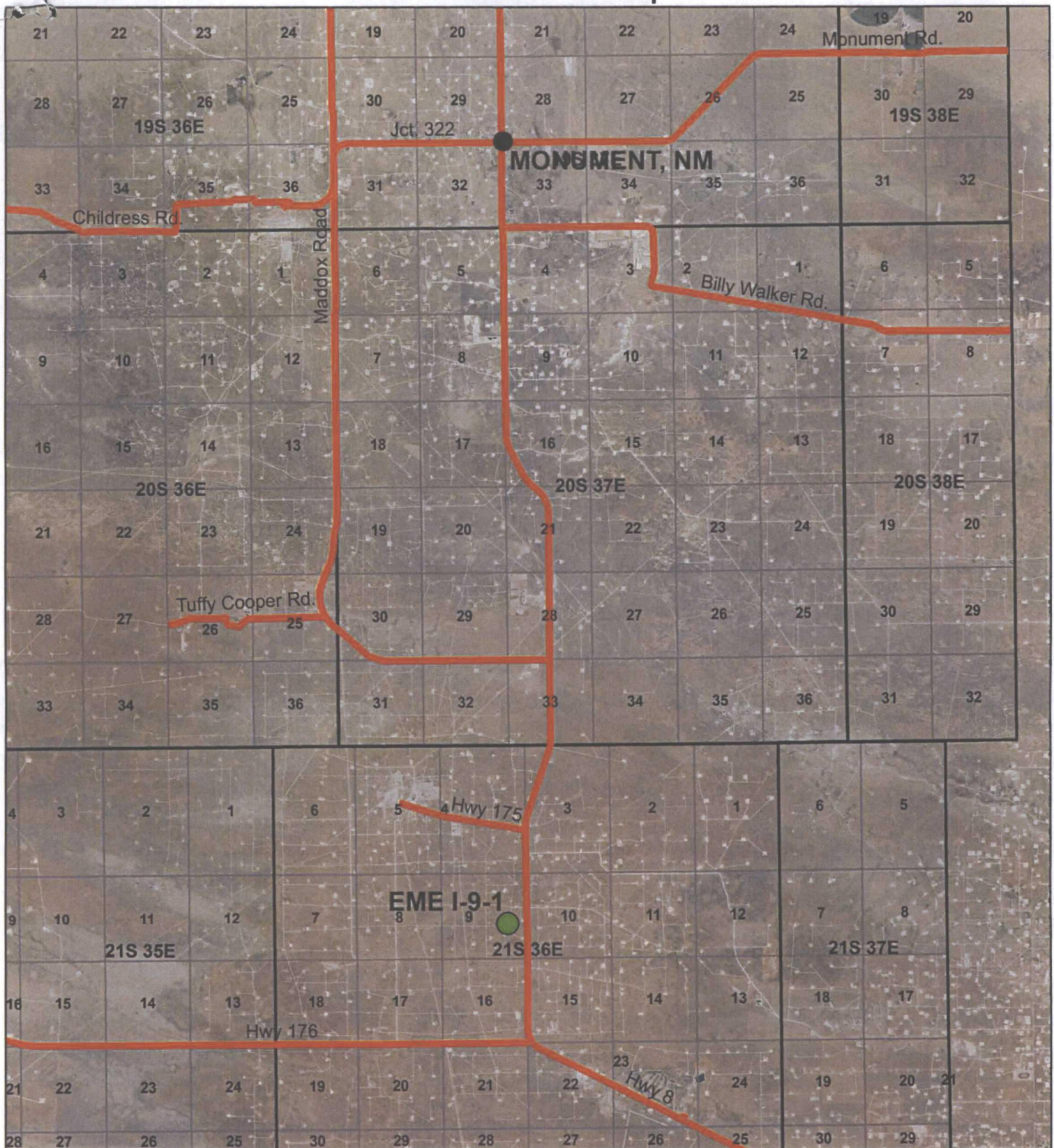
RECEIVED OOD
2013 MAY 17 P 2:25



Site Maps

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

Site Location Map



**EME Jct. I-9-1
(1R427-34)**

UL/I SECTION 9
T21S, R36E
LEA COUNTY, NM



0 0.9 1.8
Miles

Drawing date: 5/3/13

Area Map



Legend

- ACTIVE LINE
- ISOLATED-LOCATED
- - - ISOLATED-PROJECTED
- X EME REMOVED BOXES



EME Jct. I-9-1 (1R427-34)

UL/I SECTION 9
T21S, R36E
LEA COUNTY, NM



0 500 1,000
Feet

Drawing date: 5/3/13



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 | I-9-1 | I | 9 | 21 S | 36 E | Lea | Length | Width | Depth |
| | | | | | | | 6 | 5 | 9 |

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ Millard Deck _____ OTHER _____

Depth to Groundwater _____ 200 _____ feet NMOCD SITE ASSESSMENT RANKING SCORE: _____ 0 _____

Date Started _____ 9/12/2003 _____ Date Completed _____ 9/30/2003 _____ OCD Witness _____ No _____

Soil Excavated _____ 187 _____ cubic yards Excavation Length _____ 30 _____ Width _____ 14 _____ Depth _____ 12 _____ feet

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

FINAL ANALYTICAL RESULTS: Sample Date _____ 9/15/2003 _____ Sample Depth _____ 12 ft bgs _____

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 | PID ppm | GRO mg/kg | DRO mg/kg | Chloride mg/kg |
|-----------------|---------|-----------|-----------|----------------|
| SIDEWALLS | 12 | <10.0 | <10.0 | 144 |
| BOTTOM | 22 | <10.0 | <10.0 | 592 |
| REMEDIATED | 64 | <10.0 | <10.0 | 304 |

General Description of Remedial Action: This junction site was delineated

with a backhoe and chloride and PID readings were taken regularly. Chloride concentrations exhibited a conclusive vertical and lateral decline. PID readings were very low throughout and lab results confirmed that TPH concentrations are well below NMOCD guidelines.

The excavated soil was land farmed on-site and then backfilled into the hole. The junction has been re-plumbed with a new poly pipeline and a new water-tight junction box has been built over it. The disturbed surface was re-seeded with a blend of native vegetation on 12/12/2003 and will be monitored for growth.

enclosures: lab results, chloride graph, photos, PID readings

CHLORIDE FIELD TESTS

| LOCATION | DEPTH (ft) | ppm |
|--------------|------------|------|
| vertical | 8 | 4482 |
| | 9 | 1885 |
| | 10 | 1329 |
| | 11 | 1101 |
| | 12 | 929 |
| | 13 | 744 |
| | 14 | 573 |
| 4-wall comp. | n/a | 193 |
| bottom comp. | 12 | 506 |
| remed. comp. | n/a | 292 |

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

DATE _____ 12/30/2003 _____ PRINTED NAME _____ Kristin Farris _____

SIGNATURE _____ *Kristin Farris* _____ TITLE _____ Project Scientist _____

EME jct. I-9-1



Undisturbed junction box

7/23/2003



30 x 14 x 12-ft-deep Excavation

9/15/2003



Construction of New Junction Box

10/2/2003



Seeding Disturbed Surface

12/12/2003

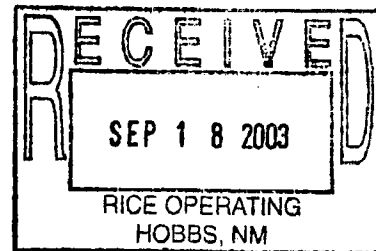


ARDINAL LABORATORIES

PHONE (325) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

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

ANALYTICAL RESULTS FOR
RICE OPERATING CO.
ATTN: KRISTIN FARRIS
122 W. TAYLOR
HOBBS, NM 88240
FAX TO: (505) 397-1471



Receiving Date: 09/15/03
Reporting Date: 09/16/03
Project Number: NOT GIVEN
Project Name: EME I-9-1
Project Location: LEA CO., NM

Sampling Date: 09/15/03
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
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) |
|-----------------------------|----------------------|--|--|----------------|
| | | 09/15/03 | 09/15/03 | 09/16/03 |
| H8004-1 | BOTTOM COMPOSITE 12' | <10.0 | <10.0 | 592 |
| H8004-2 | 4 WALL COMPOSITE | <10.0 | <10.0 | 144 |
| H8004-3 | STOCKPILE COMPOSITE | <10.0 | <10.0 | 304 |
| Quality Control | | 777 | 821 | 970 |
| True Value QC | | 800 | 800 | 1000 |
| % Recovery | | 97.1 | 103 | 97.0 |
| Relative Percent Difference | | 11.3 | 12.1 | 1.0 |

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

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

Bryan A. Cable
Chemist

9/16/03
Date

H8004.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.



CARDINAL LABORATORIES, INC.

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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page ____ of ____

| | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|-----------------------------|----------------------|--------------|--|------------|----------|-----------|--------|---------|------------|------------|--------|----------------|--------------|----------|----------|--|--|--|--|--|--|--|--|--|--|
| Company Name: RICE Operating Company | | BILL TO | | ANALYSIS REQUEST | | | | | | | | | | | | | | | | | | | | | | |
| Project Manager: Kristin Farries | | P.O. #: | | <div style="display: flex; justify-content: space-between;"> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">TREN 8015</div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">Chloride</div> </div> | | | | | | | | | | | | | | | | | | | | | | |
| Address: 122 W. Taylor | | Company: RICE | | | | | | | | | | | | | | | | | | | | | | | | |
| City: Hobbs, State: NM Zip: 88240 | | Attn: | | | | | | | | | | | | | | | | | | | | | | | | |
| Phone #: 393-9174 Fax #: 397-1471 | | Address: | | | | | | | | | | | | | | | | | | | | | | | | |
| Project #: Project Owner: | | City: | | | | | | | | | | | | | | | | | | | | | | | | |
| Project Name: EME I-9-1 | | State: Zip: | | | | | | | | | | | | | | | | | | | | | | | | |
| Project Location: Lee | | Phone #: | | | | | | | | | | | | | | | | | | | | | | | | |
| Sampler Name: Gary Sterle | | Fax #: | | | | | | | | | | | | | | | | | | | | | | | | |
| FOR LAB USE ONLY | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Lab I.D. | Sample I.D. | (GRAB OR C)OMP. | # CONTAINERS | MATRIX | | | | | PRESERV | | SAMPLING | | | | | | | | | | | | | | | |
| | | | | GROUNDWATER | WASTEWATER | SOIL | CRUDE OIL | SLUDGE | OTHER: | ACID/BASE: | ICE / COOL | OTHER: | DATE | TIME | | | | | | | | | | | | |
| H0004-1 | Bottom Composite | CG | | | | X | | | | X | | | 9.15.03 | 15:16 | X | X | | | | | | | | | | |
| -2 | 4 Well Composite | CG | | | | X | | | | X | | | 9.15.03 | 15:45 | X | X | | | | | | | | | | |
| -3 | Stack pile Composite | CG | | | | X | | | | X | | | 9.15.03 | 16:01 | X | X | | | | | | | | | | |

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 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 30 days after completion of the analyses 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 remedies 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 collection, including attorney's fees.

| | | | | | |
|------------------------------|--|-------|---|--|----------------|
| Sampler Relinquished: | | 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: | Received By: (Lab Staff) | REMARKS: | |
| | | Time: | | Fax copy to Rice | |
| Delivered By: (Circle One) | | | | | |
| Sampler - UPS - Bus - Other: | | | | | |
| | | | Sample Condition | CHECKED BY: | |
| | | | Cool Intact | (initials) | |
| | | | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| | | | <input type="checkbox"/> No <input type="checkbox"/> No | | |

5 ET6 I

JUNCTION BOX FINAL REPORT
SITE EXCAVATION INFORMATION

EME J-5-1

DATE DEPTH CL PID TPH SOIL COMPOSITION

LAB Tony Re Environmental

6 C.
6 C.
6 C.

| | | | | |
|---------|-----------------|------|----|-----|
| 7-15-03 | N.W. 43' / 49 | 10.5 | 16 | MIX |
| | S.W. 47' / 19 | 11.7 | 8 | |
| | W.W. 47' 230 | 10.8 | 18 | |
| | E.W. 47' 289 | 16.2 | 14 | |
| | 4 WELL 193 144 | 31.2 | 12 | |
| | Bottom 12506592 | 49.6 | 22 | |
| | Stallpike 29234 | 28.2 | 64 | |

Long Steel



Current Photodocumentation

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

EME I-9-1 (1R427-34)
Unit Letter I, Section 9, T21S, R36E



Facing Southwest

12/17/2012



Facing Northwest

12/17/2012

Hansen, Edward J., EMNRD

From: Katie Jones <kjones@riceswd.com>
Sent: Thursday, May 30, 2013 2:54 PM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder; Laura Pena
Subject: ROC - EME I-9-1 (1R427-34)
Attachments: ROC - EME I-9-1 (1R427-34) Field Notes.pdf; ROC - EME I-9-1 (1R427-34) Field Data.pdf

Mr. Hansen,

Attached are the field notes and a PDF summary of those field notes for the EME I-9-1 (1R427-34). Please contact Hack at (575)631-6432 if you have any questions or require any additional information.

Thank you.

Katie Jones

e: EME I-9-1 Legal: U/L-I, Section 9, T21S, R36E Landowner: Millard Deck GW: 200'

[illegible]

| | |
|------------|------|
| North Wall | |
| Cl- | 149 |
| PID | 10.5 |

| | |
|------------|------|
| South Wall | |
| Cl- | 119 |
| PID | 11.7 |

| | |
|-----------|------|
| East Wall | |
| Cl- | 289 |
| PID | 16.2 |

| | |
|-----------|------|
| West Wall | |
| Cl- | 230 |
| PID | 15.8 |

| | |
|-------------|------|
| 4 Wall Comp | |
| Cl- | 193 |
| PID | 31.2 |

| | | | | | | |
|-----|------|------|------|-------|------|------------|
| | Pt.1 | Pt.2 | Pt.3 | Pt. 4 | Pt.5 | 5 Pt Comp. |
| CI- | | | | | | 506 |
| PID | | | | | | 49.6 |

| Background at 6" | | | | |
|------------------|----|--|-----|---------|
| Cl- | 59 | | PID | no odor |

Excavation Deminsions: 30x14x12-ft bgs

Soil hauled off and where: N/A

Soil imported and from where: N/A

| field results | cl- | pid | lab results | gro | dro | Cl- |
|---------------------|-----|------|-------------------|-------|-------|-----|
| BOTTOM 5PT. COMP. @ | 506 | 49.6 | BOTTOM 5PT. COMP. | <10.0 | <10.0 | 592 |
| 4 WALL COMP. | 193 | 31.2 | 4 WALL COMP. | <10.0 | <10.0 | 144 |
| Stockpile | 292 | 28.2 | Stockpile | <10.0 | <10.0 | 304 |

Summary: _____

Signature:

Date: _____

ET6Z
Initial Report Vertical Log 14' at center north side W. to E.
SITE EXCAVATION INFORMATION

ENF I-9-1

| 9-12-03 | 9' | 1885 | | Little odor | celiche Light Brown Sand |
|---------|-----|------|------|-------------|--------------------------|
| | 10' | 1329 | | no odor | |
| | 11' | 1101 | | | |
| | 12' | 929 | 12.1 | | |
| | 13' | 744 | 14.9 | | Light Brown Sand |
| | 14' | 573 | 12.4 | | |

Gary Hall

(2)

ET6I

(5' W)

Lateral Dis 14' North West 5' West from center W to E

SITE EXCAVATION INFORMATION

EME I-9-1

DATE DEPTH CL PID TPH SOIL COMPOSITION

| DATE | DEPTH | CL | PID | TPH | SOIL COMPOSITION |
|---------|-------|-----|------|-----|------------------------------|
| 9-20-03 | 9' | 272 | | | no odor celicite light brown |
| | 10' | 435 | | | |
| | 11' | 482 | | | |
| | 12' | 518 | 26.5 | | |
| | 13' | 224 | 28.6 | | |
| | 14' | 300 | 22.8 | | Light Brown Sand |

③

ET6I

5'5

Latentil dig 12' South 5' from center N. to S.
SITE EXCAVATION INFORMATION

EME 2-5-1

DATE DEPTH CL PID TPH SOIL COMPOSITION

| | | | | | | |
|---------|-----|------|------|--|-------------|-------------------------|
| 9-12-02 | 1' | 28 | | | no odor | Brown Sand |
| | 2' | 57 | | | | 1 1 1 |
| | 3' | 86 | | | | Little Light Brown Sand |
| | 4' | 86 | | | | |
| | 5' | 148 | | | | |
| | 6' | 196 | | | | |
| | 7' | 651 | | | | |
| | 8' | 1284 | | | Little odor | |
| | 9' | 1081 | | | 1 1 | |
| | 10' | 834 | | | no odor | |
| | 11' | 496 | | | 1 1 1 | |
| | 12 | 362 | 20.4 | | | |

Gary Stark

(4)

5' N

ET6I

Lateral North 4 + center 5' North running N. to S.
SITE EXCAVATION INFORMATION

EMS I-9.1

DATE DEPTH CL PID TPH SOIL COMPOSITION

| | | | | | |
|---------|----|-----|------|---------|---------------------------|
| 9.15.03 | 1 | 61 | | NO odor | Brown Sand |
| | 2 | 61 | | | } { } |
| | 3 | 85 | | | |
| | 4 | 215 | | | < Little Light Brown Sand |
| | 5 | 372 | | | |
| | 6 | 386 | | | |
| | 7 | 455 | | | |
| | 8 | 377 | | | |
| | 9 | 348 | | | |
| | 10 | 314 | | | |
| | 11 | 314 | | | Light Brown Sand |
| | 12 | 250 | 14.7 | | 1 1 1 |

Gary Hall

5

Junction box Final Report

SITE EXCAVATION INFORMATION

EME J-9-1

| DATE | DEPTH | CL | PID | TPH | SOIL COMPOSITION |
|------|-------|----|-----|-----|------------------|
|------|-------|----|-----|-----|------------------|

LAB

Tony Re Environmental

| 5.15.05 | N.W. 243/49 | 10.5 | 16 | mix |
|---------|--------------------|------|----|-----|
| | S. Well 17' 119 | 11.7 | 8 | } |
| | W. Well 17' 230 | 15.8 | 18 | |
| | E. Well 17' 289 | 16.2 | 14 | |
| | 4 Wells 193 144 | 31.2 | 12 | |
| | Bottom 12' 506 592 | 49.6 | 22 | |
| | Stall pile 292 304 | 28.2 | 64 | |

L. 6 C.
L. 6 C.
L. 6 C.

Gary Hart