

1R - 427-294

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, July 16, 2013 10:20 AM
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 (1R427-294) Termination - ROC EME Jct K-15 Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct K-15 Site
Unit Letter K, Section 15, T21S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-294) 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 June 27, 2013 (received July 1, 2013). The report is 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 (1R427-294) 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

RECEIVED OCD

2013 JUL -1 P 2: 17

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8890

June 27, 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 Jct. K-15 (1R427-294): UL/K, 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 2009, ROC initiated work on the former K-15 junction box. The site is located in UL/K, Sec. 15, T21S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 175 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x3x9 ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in low chloride concentrations. The 9 ft sample was sent to a commercial for analysis of chloride and TPH, resulting in a chloride concentration of 80 mg/kg and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The excavation was backfilled with the excavated soil to ground surface and contoured to the surrounding area. On 2/25/2009, the site was seed with a blend of native vegetation. A junction box is no longer needed at the site.

On 5/6/2013, RECS personnel were on site to conduct surface restoration. Imported top soil was used to promote vegetative growth. A sample of the imported top soil was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in low concentrations of chloride and a PID reading of 11.4 ppm. A representative sample was taken to a commercial laboratory for analysis of chloride, resulting in a concentration

below detectable limits. On 5/16/2013, soil amendments were added to the site and the site was seeded with a blend of native vegetation. Vegetation will act as an evapotranspiration barrier that will also inhibit the downward migration of chlorides and hydrocarbons. Plants capture water through their roots and so reduce the amount of water infiltrating below the root zone.

The junction box site location map, area 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.

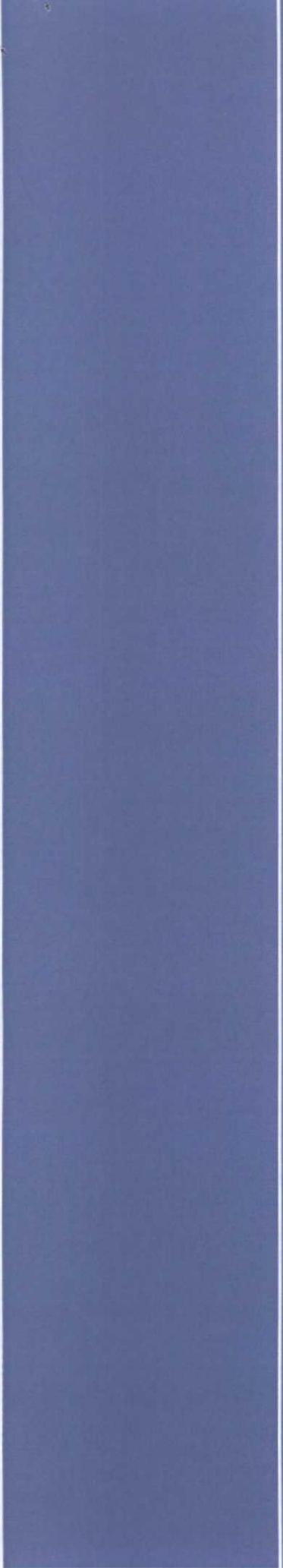
Please contact me at (575) 393-9174 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,
RICE Operating Company

A handwritten signature in black ink, appearing to read "H. Conder", with a long horizontal flourish extending to the right.

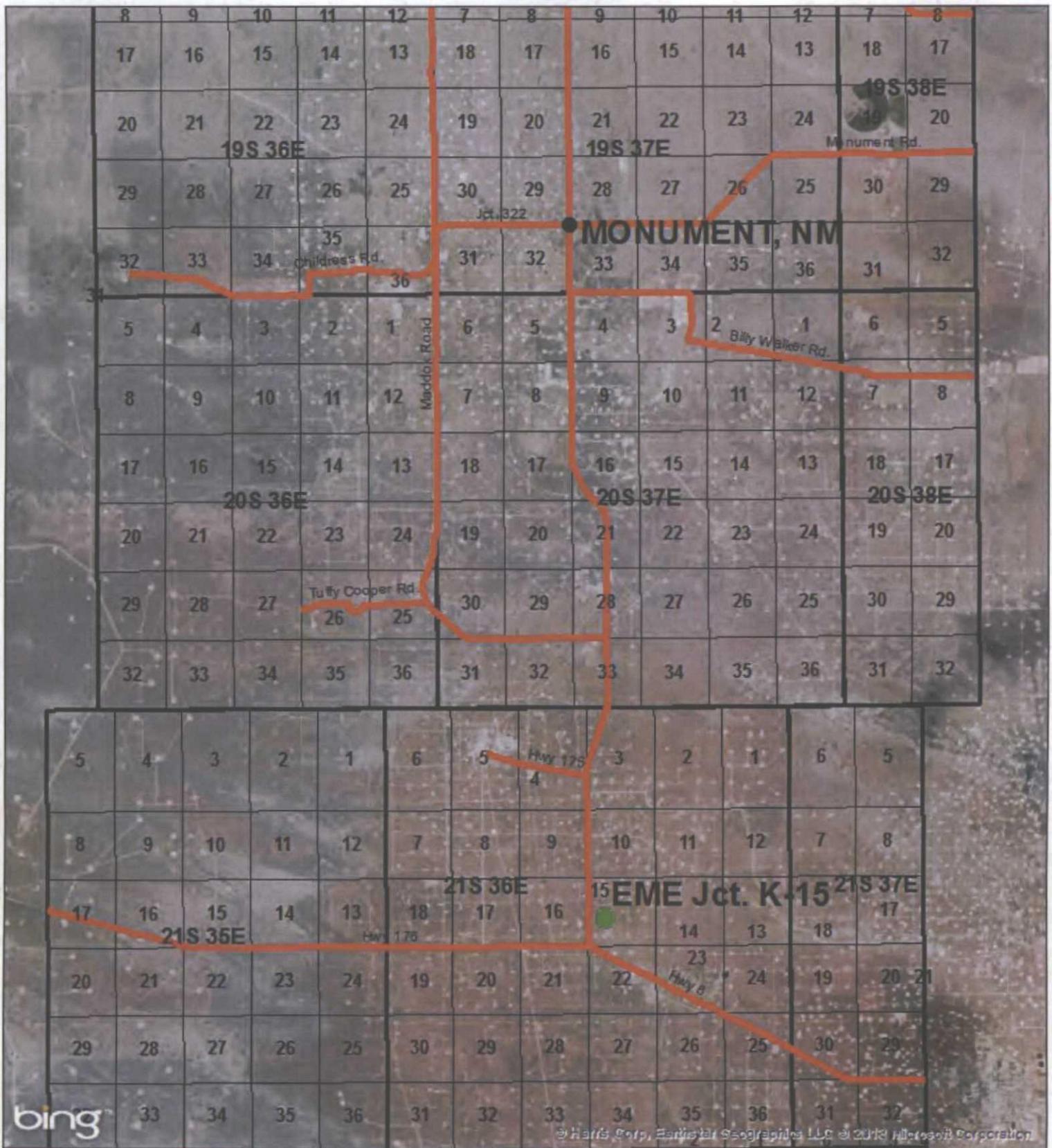
Hack Conder
Environmental Manager

enclosures



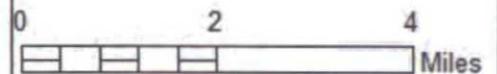
Site Maps

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



EME Jct. K-15

UL K Section 15
T-21-S-R-36-E
1R427-294



Drawing date: 6/21/2013
Drafted by: C. Ursanic



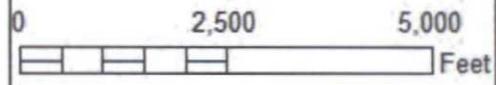
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Image courtesy of USGS © 2012 Microsoft Corporation ImageFetch.com

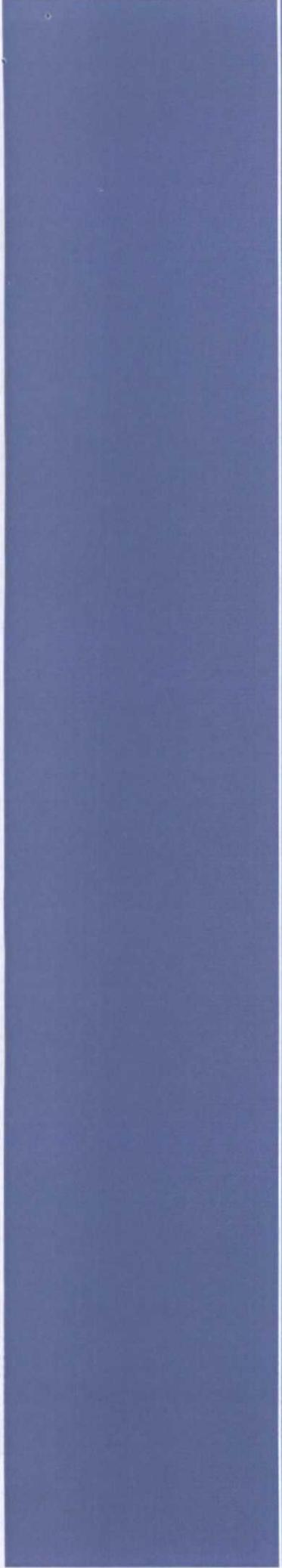


EME Jct. K-15

UL K Section 15
 T-21-S R-36-E
 1R427-294



Drawing date: 6/21/2013
 Drafted by: C. Ursanic



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		
							Length	Width	Depth
Eunice Monument Eumont (EME)	Jct. K-15	K	15	21S	36E	Lea	eliminated		

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

Depth to Groundwater 175 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 1/13/2009 Date Completed 1/20/2009 OCD Witness no

Soil Excavated 5 cubic yards Excavation Length 5 Width 3 Depth 9 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 1/13/2009 Sample Depth 9 ft

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
SOURCE 9' GRAB	2.1	<10.0	<10.0	80

LOCATION	DEPTH	mg/kg
background	6"	120
vertical delineation trench at the junction (source)	5'	90
	6'	90
	7'	120
	8'	120
	9'	150

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 5x3x9-ft-deep excavation. Field data suggests low concentrations of organic vapors and chloride concentrations similar to that of the background. The deepest sample, 9 ft BGS, was sent to a commercial laboratory for analysis of chloride and TPH which confirmed low concentrations. The excavated soil was returned to the excavation to ground surface and contoured to the surrounding area. On 2/25/2009, 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 Eric Garrison SIGNATURE *Eric Garrison* COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Katie Jones INITIAL KJ

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE *Larry Bruce Baker Jr.* DATE 5-8-09

EME Jct. K-15

Unit K, Section 15, T21S, R36E



excavating the source, facing south

1/13/2009



collecting a soil sample, facing south

1/13/2009



final excavation, facing north

1/13/2009



seeding backfilled site, facing south

2/25/2009



ARDINAL LABORATORIES

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

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

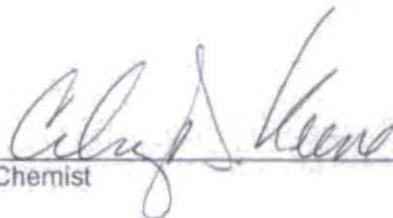
Receiving Date: 01/13/09
Reporting Date: 01/19/09
Project Number: NOT GIVEN
Project Name: EME JCT K-15
Project Location: EME JCT K-15

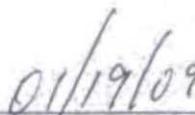
COPY

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 ₅ -C ₁₀) (mg/kg)	DRO (>C ₁₀ -C ₂₈) (mg/kg)	CI* (mg/kg)
ANALYSIS DATE		01/17/09	01/17/09	01/14/09
H16675-1	SOURCE BTTM GRAB @ 9'	<10.0	<10.0	80
Quality Control		422	458	500
True Value QC		500	500	500
% Recovery		84.4	91.6	100
Relative Percent Difference		4.7	4.8	2.0

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI: Std. Methods 4500-CIB
*Analysis performed on a 1:4 w:v aqueous extract.


Chernist


Date

H16675 TCL RICE

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RICE OPERATING COMPANY

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

CK	<input type="checkbox"/>
MODEL	<input checked="" type="checkbox"/>
NO.	<input type="checkbox"/>

MODEL: PGM 7600	SERIAL NO: 110-013676
MODEL: PGM 7600	SERIAL NO: 110-013744
MODEL: PGM 7600	SERIAL NO: 110-12383
MODEL: PGM 7600	SERIAL NO: 110-012920

COPY

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 08-3425	EXPIRATION DATE: 08-29-09
FILL DATE: 02-29-08	METER READING ACCURACY: 100PPM

ACCURACY: +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	K-15	#	15	NIS	36E

Initial Source

Background

Initial Source		Background	
SAMPLE ID	PID	SAMPLE ID	PID
5	5.1	6 ¹	0.0
6	2.7		
7	1.8		
8	1.4		
9	2.1		

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

SIGNATURE: *[Signature]*

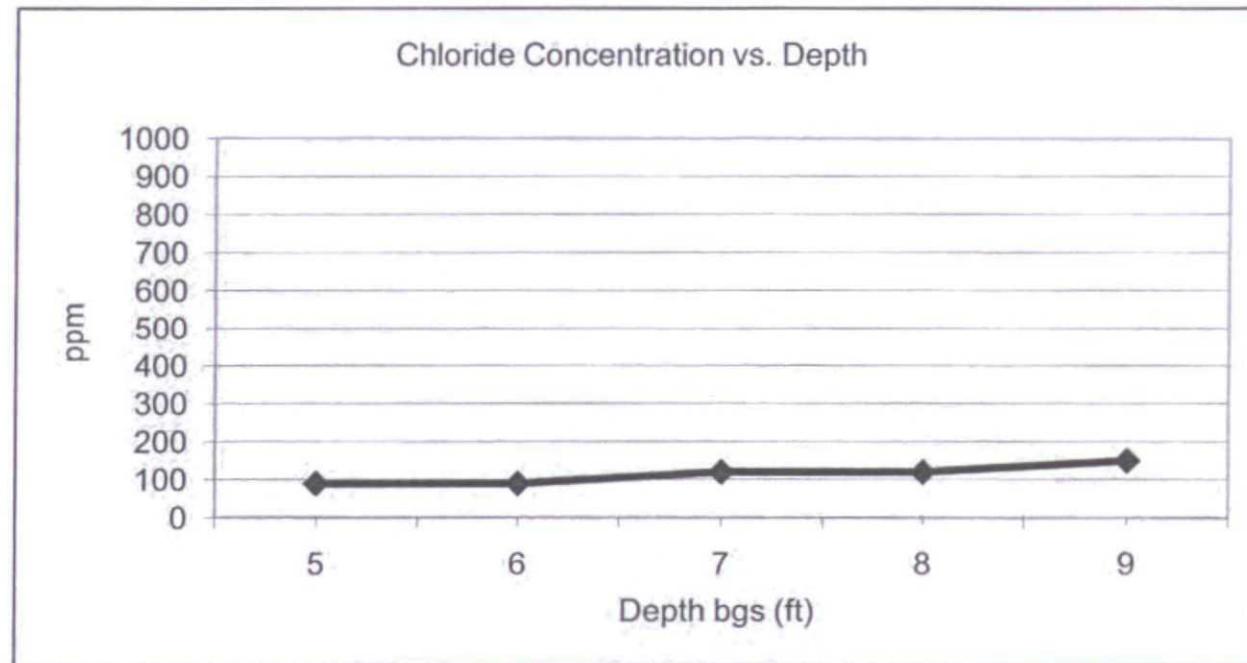
DATE: 1-13-09

EME Jct. K-15

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

Backhoe samples at the junction (source)

Depth bgs (ft)	[Cl] ppm
5	90
6	90
7	120
8	120
9	150



Groundwater = 175 ft



Revegetation Documentation

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 Jct. K-15						
U/L K	Section 15	Township T-21-S	Range R-36-E	County Lea	Latitude N32*28.275	Longitude W103*15.504
Contact Name: Hack Conder						
Email: hconder@rice-ecs.com						
Site size: 40'x30' 1,200 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 checked="" type="checkbox"/>	Blended <input checked="" type="checkbox"/>	Depth (in):
Texture: Sandy	Describe soil & subsoil: Caliche and Sand Mix			
Soil prep methods: Rip <input checked="" type="checkbox"/>	Depth(in): 6"	Disc <input checked="" type="checkbox"/>	Depth (in): 3"	Rollerpack <input type="checkbox"/>
Date completed: 1/20/2009				

3. Bioremediation

Fertilizer <input type="checkbox"/>	Hay <input type="checkbox"/>	Other <input checked="" type="checkbox"/> 4 Bags Bio Nhance
Type:		Describe: 1 Bag Manure
Lbs/acre:		2 Bags Garden Soil

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: 2Lbs. Lea Co. Mix, 2Lbs. Race Horse Oats and 2Lbs. Sudan Grass	Seeding date: 5/16/2013
Broadcast <input checked="" type="checkbox"/>			
Method: Mechanical Seeder			
Soil conditions during seeding: Dry <input checked="" type="checkbox"/> Damp <input type="checkbox"/> Wet <input type="checkbox"/>			
Photos attached <input type="checkbox"/>	Observations: The Seed Was tilled into the site.		
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: Kyle Norman	Title: Environmental Tech	Date: 5/16/2013
Signature:		

May 08, 2013

KYLE NORMAN

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: EME JCT K-15

Enclosed are the results of analyses for samples received by the laboratory on 05/07/13 9:00.

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
 KYLE NORMAN
 112 W. Taylor
 Hobbs NM, 88240
 Fax To: (575) 397-1471

 Received: 05/07/2013
 Reported: 05/08/2013
 Project Name: EME JCT K-15
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 05/06/2013
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Jodi Henson

Sample ID: IMPORTED SOIL (H301077-01)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: DW						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	05/08/2013	ND	416	104	400	3.77		

Cardinal Laboratories

* = Accredited Analyte

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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



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

Company Name: <u>Rice Operating</u>		BILL TO		ANALYSIS REQUEST																			
Project Manager: <u>Kyle Norman</u>		P.O. #:																					
Address:		Company:																					
City:	State:	Zip:	Attn:																				
Phone #:	Fax #:	Address:																					
Project #:	Project Owner:		City:																				
Project Name:		State:	Zip:																				
Project Location: <u>EME ICT K-15</u>		Phone #:																					
Sampler Name: <u>Robert Egans</u>		Fax #:																					
FOR LAB USE ONLY																							
Lab I.D.	Sample I.D.	(GRAB OR (C)OMP.	# CONTAINERS											MATRIX					PRESERV.		SAMPLING		
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :	DATE	TIME									
<u>H30107</u>	<u>Importe Soil</u>	<u>C</u>	<u>1</u>			<u>✓</u>							<u>5-6-13</u>		<u>✓</u>								

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Relinquished By: <u>Robert Egans</u>	Date: <u>5/7/13</u>	Received By: <u>Jodi Henson</u>	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:	
	Time: <u>4:50</u>		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:	
Relinquished By:	Date:	Received By:	REMARKS: <u>Email</u> <u>K Jones, H Conder, K Norman B Baker</u>		
	Time:				
Delivered By: (Circle One)		Sample Condition	CHECKED BY:		
Sampler - UPS - Bus - Other:		Cool Intact <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<u>[Signature]</u> (Initials)		

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

