

1R - 427-306

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, July 16, 2013 1:33 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 (1R427-306) Termination - ROC EME Jct J-8 Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct J-8 Site
Unit Letter J, Section 8, T20S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-306) 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 (1R427-306) 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. J-8 (1R427-306): UL/J, Sec. 8, 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 J-8 junction box. The site is located in UL/J, Sec. 8, T20S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 34 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 25x15x12 ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in low chloride concentrations similar to background concentrations. The excavated soil was blended on site and 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 128 mg/kg, a gasoline range organics (GRO) concentration below detectable limits and a diesel range organics (DRO) concentration of 32.6 mg/kg. The bottom composite resulted in a chloride concentration of 80 mg/kg, a GRO concentration below detectable limits and a DRO concentration of 76.2 mg/kg. The blended backfill resulted in a chloride concentration of 224 mg/kg, a GRO concentration below detectable limits and a DRO concentration of 774 mg/kg. A total of 192 yards of blended backfill was hauled to a NMOCD approved facility. The excavation was backfilled with the clean imported soil

to ground surface and contoured to the surrounding area. On 12/18/2009, the site was seed with a blend of native vegetation. A junction box is no longer needed at the site.

On 4/18/2013, 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 2.0 ppm. A representative sample was taken to a commercial laboratory for analysis of chloride, resulting in a concentration below detectable limits. On 4/25/2013, soil amendments were added to the site and the site was seeded with a blend of native vegetation. Vegetation will act as an evapo-transpiration 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, laboratory analysis, PID sheet 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 stylized flourish at the end.

Hack Conder
Environmental Manager

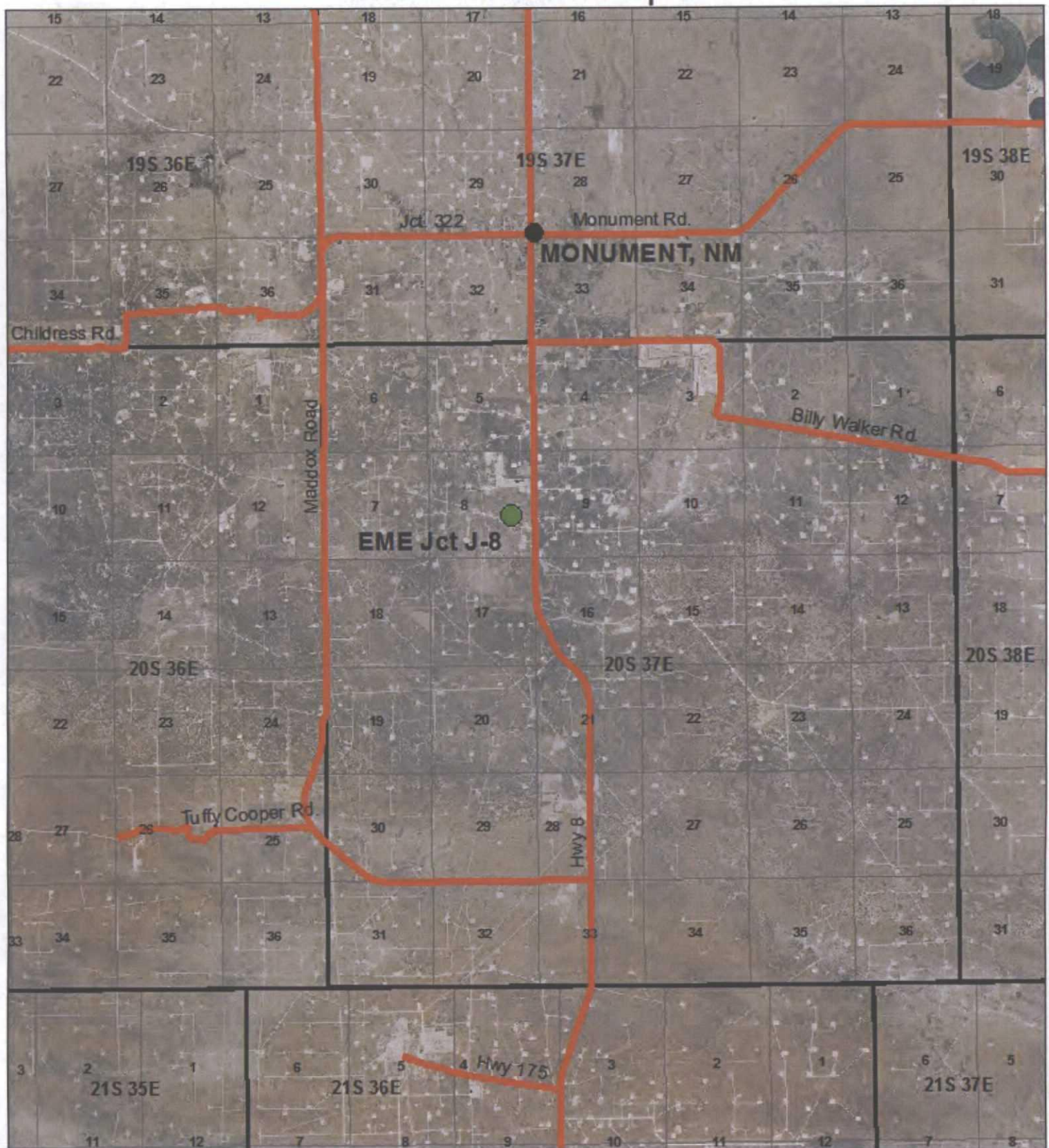
enclosures



Site Maps

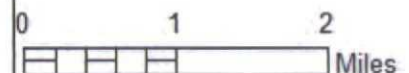
RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471

Site Location Map



EME Jct. J-8
(1R427-306)

UL/J SECTION 8
 T20S, R37E
 LEA COUNTY, NM



Drawing date: 5/3/13



**EME Jct. J-8
(1R427-306)**

UL/J SECTION 8
T20S, 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		
Eunice Monument Eumont (EME)	Jct. J-8	J	8	20S	37E	Lea	Length	Width	Depth
							eliminated		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER Jimmie T. Cooper et ux Betty B. OTHER _____

Depth to Groundwater 34 feet NMOCD SITE ASSESSMENT RANKING SCORE: 40*

Date Started 9/14/2009 Date Completed 11/6/2009 OCD Witness no

Soil Excavated 167 cubic yards Excavation Length 25 Width 15 Depth 12 feet

Soil Disposed 192 cubic yards Offsite Facility C and C Landfarm Location Monument, NM

FINAL ANALYTICAL RESULTS: Sample Date 9/24/2009, 10/02/2009 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.	0.2	<10.0	32.6	128
BOTTOM COMP.	17.9	<10.0	76.2	80
BLENDED BACKFILL	77.0	<10.0	774	224

LOCATION	DEPTH	mg/kg
4-wall comp.	n/a	145
bottom comp.	12'	147
blended backfill	n/a	204
background	6"	208
vertical delineation of the junction (source)	3'	148
	4'	170
	5'	179
	6'	170
	7'	169
	8'	147
	9'	150
	10'	222
	11'	142
	12'	144

General Description of Remedial Action: This junction 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 25x15x12-ft-deep excavation. Field data suggest the site is low in organic vapors and chloride concentrations are similar to that of the background. Representative composite samples were collected from the excavation walls, bottom, and blended excavated soil. The representative samples were analyzed by a commercial laboratory for chloride and TPH, which confirmed low concentrations. The blended backfill was hauled to an OCD approved facility. The site was backfilled with clean imported soil and contoured to the surrounding area. On 12/18/09, site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

* Abandon windmill 460 ft. southeast and a monitor well 157 ft. southeast

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 Jordan Woodfin COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Larry Bruce Baker Jr. INITIAL LBB

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE Larry Bruce Baker Jr. DATE 2-8-10

EME Junction J-8

Unit J, Section 8, T20S, R37E



Site prior to delineation

9/14/2009



Excavating 5 ft. north vertical

9/23/2009



Backfilling excavation

11/05/2009



Site complete

12/18/2009



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

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

Receiving Date: 09/24/09
Reporting Date: 09/30/09
Project Number: NOT GIVEN
Project Name: EME JCT J-8
Project Location: EME JCT J-8

Sampling Date: 09/24/09
Sample Type: SOIL
Sample Condition: INTACT
Sample Received By: CK
Analyzed By: AB/HM

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/kg)	DRO (C ₁₀ -C ₂₈) (mg/kg)	CI* (mg/kg)
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ANALYSIS DATE	09/29/09	09/29/09	09/25/09
H18327-1 5PT BTM COMP	<10.0	76.2	80
H18327-2 4 WALL COMP	<10.0	32.6	128
Quality Control	509	505	500
True Value QC	500	500	500
% Recovery	102	101	100
Relative Percent Difference	0.6	1.6	2.0

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

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

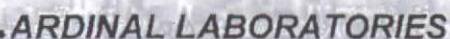
COPY

Chemist

Date

H18327 TCL RICE

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Relinquished By: <u>JORDAN WOODFIN</u> Date: <u>9-24-09</u> Time: _____		Received By: _____ Date: _____ Time: _____		Phone Result: <input type="checkbox"/> No Add'l Phone #: _____ Fax Result: <input type="checkbox"/> No Add'l Fax #: _____ REMARKS:	
Relinquished By: _____ Date: <u>9/24/09</u> Time: <u>4:35</u>		Received By: <u>[Signature]</u> Date: _____ Time: _____		EMAIL RESULTS TO <u>JWODFIN@RICESWD.COM</u> <u>JPURVIS@RICESWD.COM</u> <u>BBACER@RICESWD.COM</u>	
Delivered By: (Circle One) Sampler - UPS - Bus - Other: _____		Temp. _____ Sample Condition (Cool) Intact <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		CHECKED BY: (Initials) <u>[Signature]</u>	

† Cardinal cannot accept verbal changes. Please fax written changes to 575-393-2476.

RICE OPERATING COMPANY

122 West Taylor Hobbs, NM 88240

PHONE: (575) 393-9174 FAX: (575) 397-1471

PID METER CALIBRATION & FIELD REPORT FORM

Check Model Number:

X

Model: PGM 7300

Model: PGM 7300

Model: PGM 7300

Serial No: 590-000183

Serial No: 590-000508

Serial No: 590-000504

Model: PGM 7600

Model: PGM 7600

Model: PGM 7600

Serial No: 110-023920

Serial No: 110-013744

Serial No: 110-013676

GAS COMPOSITION: ISOBUTYLENE: 100PPM / AIR: BALANCE

LOT NO : 924503	EXPIRATION DATE: 7-5-12
FIELD DATE: 7-1-09	METER READING ACCURACY: 100

ACCURACY : +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	J-8	J	8	T20S	R37E

SAMPLE ID	PID	SAMPLE ID	PID
NORTH WALL	0	4 WALL COMP	0.2
SOUTH WALL	0		
EAST WALL	0	5pt Blm Comp.	17.9
WEST WALL	1.5		

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

SIGNATURE

Jordan Woolf

DATE: 9-24-09



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

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

Receiving Date: 10/02/09
Reporting Date: 10/06/09
Project Number: NOT GIVEN
Project Name: EME JCT J-8
Project Location: EME JCT J-8

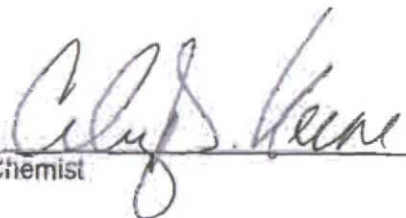
Sampling Date: 10/02/09
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: ML
Analyzed By: AB/HM

LAB NUMBER	SAMPLE ID	GRO (C ₅ -C ₁₀) (mg/kg)	DRO (C ₁₀ -C ₂₈) (mg/kg)	CI* (mg/kg)
------------	-----------	--	---	----------------

ANALYSIS DATE	10/05/09	10/05/09	10/05/09
H18402-1 BLENDED BACKFILL	<10.0	774	224
Quality Control	493	499	500
True Value QC	500	500	500
% Recovery	98.6	99.8	100
Relative Percent Difference	2.9	8.6	<0.1

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

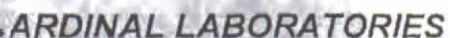
*Analysis performed on a 1:4 w:v aqueous extract. Reported on wet weight.


Chemist

COPY
10/07/09
Date

H18402 TCL RICE

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Sampler Relinquished:		Date: 10-2-09	Received By: [Signature]		Phone Result: <input type="checkbox"/> No Add'l Phone #:
[Signature]		Time: 4:30p			Fax Result: <input type="checkbox"/> No Add'l Fax #:
Relinquished By:		Date:	Received By:		REMARKS: Email Results to JWOODFIN @SPURUS @ Riceswd.com @ BBAKER
		Time:			
Delivered By: (Circle One)		Temp.	Sample Condition		
Sampler - UPS - Bus - Other:			Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/>	CHECKED BY: (Initials)	
			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	

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122 West Taylor Hobbs, NM 88240
PHONE: (575) 393-9174 FAX: (575) 397-1471
PID METER CALIBRATION & FIELD REPORT FORM

PID METER CALIBRATION & FIELD REPORT FORM

X

Serial No: 110-013676

LOT NO : 924503	EXPIRATION DATE: 7-5-12
FILL DATE: 7-1-09	METER READING ACCURACY: 100

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	J-8	J	8	T20S	R37E

[illegible]

SIGNATURE: _____

DATE: 10-2-09

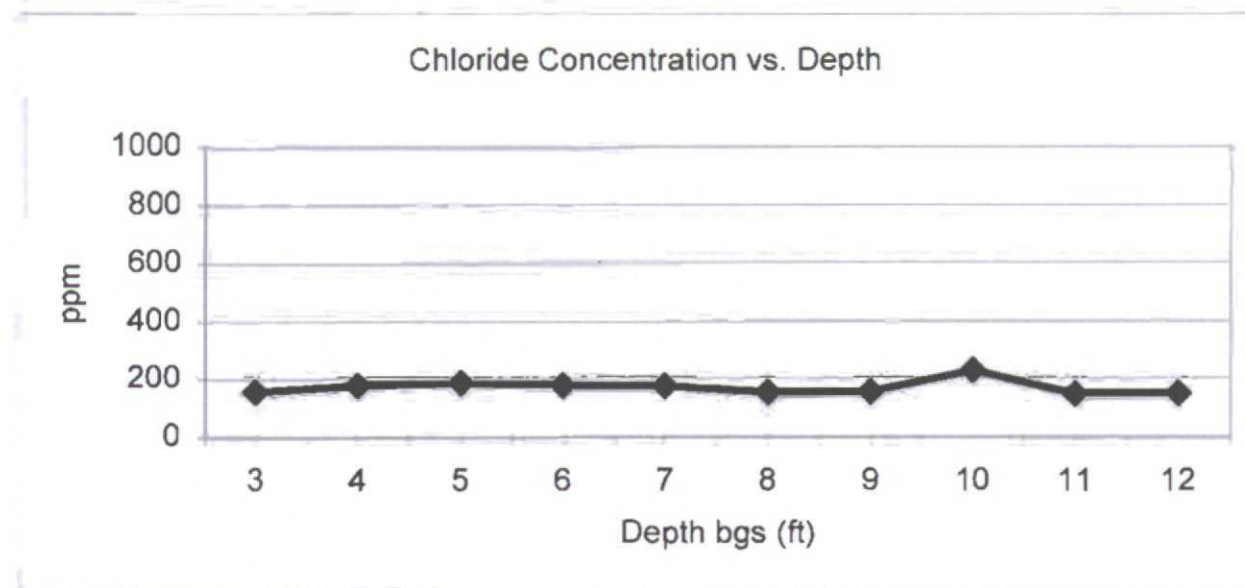
EME Junction J-8

Unit 'J', Sec. 8, T20S, R37E

Backhoe samples at the junction (source)

Depth bgs (ft)	[Cl ⁻] ppm
3	148
4	170
5	179
6	170
7	169
8	147
9	150
10	222
11	142
12	144

Groundwater = 34 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. J-8						
U/L J	Section 8	Township T-20-S	Range R-37-E	County Lea	Latitude N32*34.150"	Longitude W103*15.340"
Contact Name: Hack Conder						
Email: hconder@rice-ecs.com						
Site size: 6,000		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: Tan Sand		
Soil prep methods: Rip <input type="checkbox"/>	Depth(in):	Disc <input checked="" type="checkbox"/>	Depth (in): 3"	Rollerpack <input type="checkbox"/>
Date completed: 11/6/2009				

3. Bioremediation

Fertilizer <input type="checkbox"/>	Hay <input type="checkbox"/>	Other <input checked="" type="checkbox"/> 12 Bags of Bio Nhance
Type:		Describe: 1 Bag of Manure
Lbs/acre:		6 Bags of Potting 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: 6 lbs. Lea Co. Mix, 6 lbs. Side Oats and 6 lbs. Blue Grama	Seeding date: 4/25/2013
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 top Soil.		
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: Roderick Williams	Title: Environmental Tech	Date: 4/25/2013
Signature: 		

April 22, 2013

Hack Conder

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: EME JCT. J-8

Enclosed are the results of analyses for samples received by the laboratory on 04/19/13 11:05.

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: 04/19/2013
Reported: 04/22/2013
Project Name: EME JCT. J-8
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 04/18/2013
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: IMPORTED TOP SOIL (H300931-01)

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	04/22/2013	ND	432	108	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

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Relinquished By: <i>Kyle N.</i>		Date: <i>4-19-13</i>	Received By: <i>Jodi Henson</i>	Phone Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Phone #:
		Time: <i>11:05</i>		Fax Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Fax #:
Relinquished By:		Date:	Received By:	REMARKS:	
		Time:		email results: zconder@rice-ecs.com	
Delivered By: (Circle One)				Knorman@rice-ecs.com; lpena@riceswd.com	
Sampler - UPS - Bus - Other:		Sample Condition Cool Intact <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Kjones@riceswd.com; Bbaker@rice-ecs.com;	
		CHECKED BY: <i>[Signature]</i>		hconder@rice-ecs.com; Lweinheimer@rice-ecs.com	

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

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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.	<input type="checkbox"/>	MODEL: PGM 7300	SERIAL NO: 590-000508
MODEL	<input checked="" type="checkbox"/>	MODEL: PGM 7300	SERIAL NO: 590-000504
NO.	<input type="checkbox"/>	MODEL: PGM 7320	SERIAL NO: 592-903318
	<input type="checkbox"/>	MODEL: PGM 7300	SERIAL NO: 590-000183

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO : HAL-248-100-1	EXPIRATION DATE: 7/01/2015
METER READING ACCURACY: 99.9 PPM	

ACCURACY : +/- 2%

COMPANY
Rice

SITE	UNIT	SECTION	TOWN SHIP	RANGE
EME Jct. J-8	J	8	T-20-S	R-37-E

SAMPLE ID	PID	SAMPLE ID	PID
Cooper Pit Top Soil	2		

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

SIGNATURE:

Kyle Na

DATE: 4-18-2013

EME Jct. J-8 (1R427-306)
Unit Letter J, Section 8, T20S, R37E



Site prior to seeding, facing north

4/25/2013



Spreading amendments, facing north

4/25/2013



Seeding site, facing east

4/25/2013



Site completed, facing north

4/25/2013