

1R - 427-344

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, February 21, 2013 3:48 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 (1R427-344) Termination - ROC EME Jct G-20 Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct G-20 Site
Unit Letter G, Section 20, T19S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-344) 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 February 7, 2013 (received February 11, 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 (1R427-344) 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

RECEIVED OOD

2013 FEB 11 P 1:10

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8807

February 7, 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. G-20 (1R427-344): UL/G, Sec. 20, T19S, 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 2010, ROC initiated work on the former G-20 junction box. The site is located in UL/G, Sec. 20, T19S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 57 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 3x5x12 ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in low concentrations of each. The 12 ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 32 mg/kg and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The excavated soil was returned to the excavation and contoured to the surrounding area. On 2/25/2011, the site was seeded with a blend of native vegetation. A junction box is no longer needed at the site. Vegetation has rebounded at the site, so no re-vegetation efforts are needed.

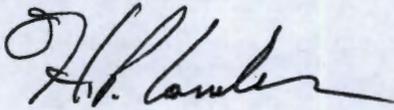
The junction box site location map, final report, photodocumentation, laboratory analysis, PID sheet, chloride graph and current photodocumentation are attached.

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.

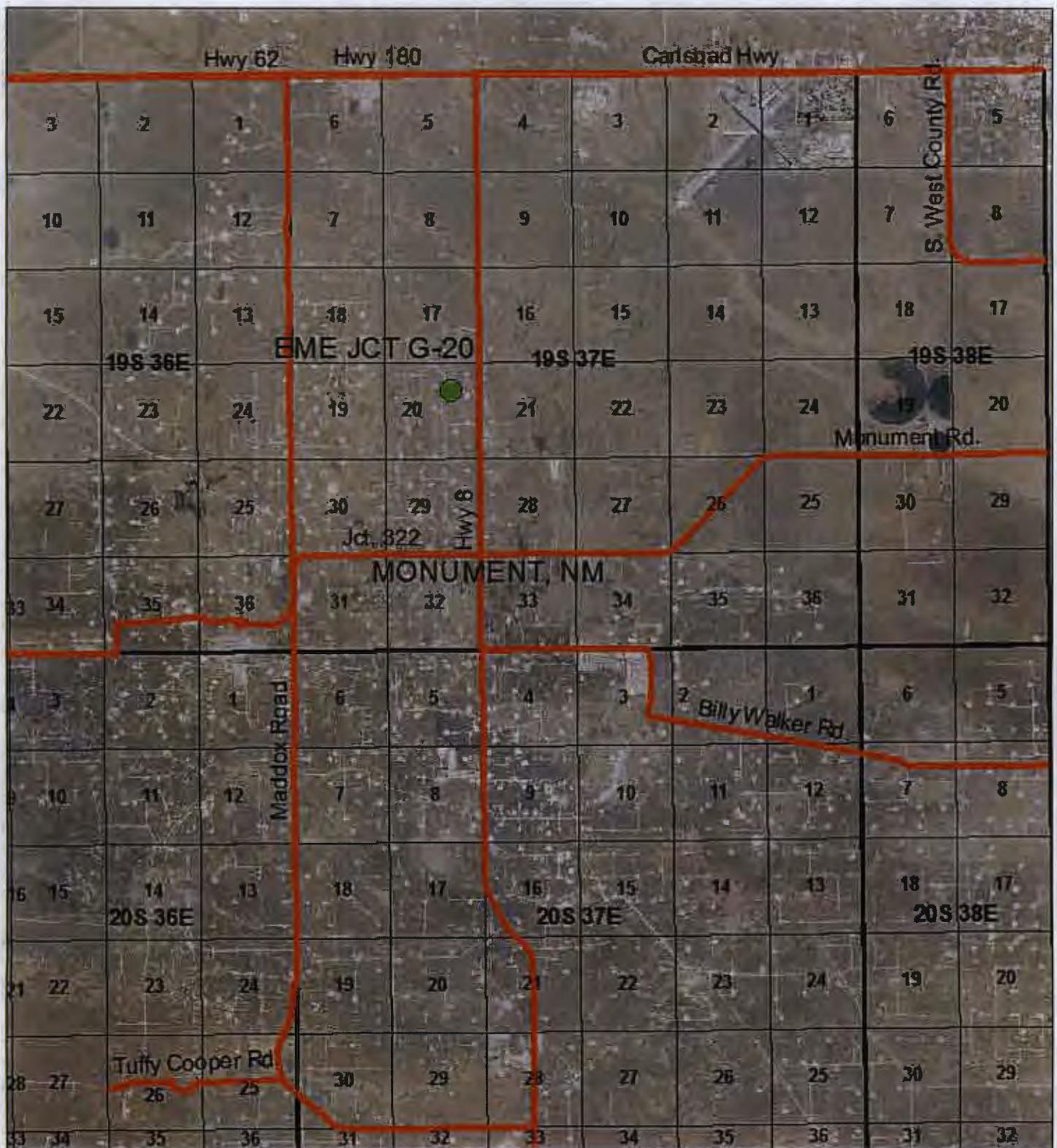
Hack Conder
Environmental Manager

enclosures



Site Location Map

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



EME JCT G-20

UL G SECTION 20
T-19-S R-37-E
LEA COUNTY, NM



Drawing date: 1/23/13
Drafted by: Tony Grieco



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. G-20	G	20	19S	37E	Lea	Eliminated		

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

Depth to Groundwater 57 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 2/25/2010 Date Completed 3/26/2010 OCD Witness no

Soil Excavated 6.7 cubic yards Excavation Length 3 Width 5 Depth 12 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 3/18/2010 Sample Depth 12ft

TPH and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines.

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
SOURCE 12' GRAB	0.1	<10.0	<10.0	32

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
background	6"	149
vertical delineation trench at the junction (source)	4'	198
	5'	142
	6'	120
	7'	116
	8'	110
	9'	139
	10'	118
	11'	150
	12'	120

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, creating a 5x3x12-ft deep excavation. Chloride field tests yielded low concentrations similar to that of the background. Organic vapors were measured using a PID, which yielded low concentrations. The deepest sample, 12-ft bgs, was sent to a commercial laboratory for analysis of chloride and TPH, which both yielded low concentrations. The excavated soil was returned to excavation to the ground surface and clean imported soil was imported as a top dressing. This soil was contoured to the surrounding area. On 2/25/2011, 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) screening, 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 Jordan Woodfin INITIAL *JW*
 PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE *Larry Bruce Baker Jr.* DATE 3-25-11

EME JCT. G-20



Site prior to delineation

2/25/2010

Unit G, Section 20, T19S, R37E



Collecting a sample

2/25/2010



Backfilling excavation

2/25/2010



Seeding excavation

11/30/2010



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

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

Receiving Date: 03/18/10
 Reporting Date: 03/22/10
 Project Number: NOT GIVEN
 Project Name: EME JCT G-20 (19/37)
 Project Location: EME JCT G-20 (19/37)

Sampling Date: 03/18/10
 Sample Type: SOIL
 Sample Condition: COOL & INTACT
 Sample Received By: JH
 Analyzed By: AB/SJ

	GRO	DRO	
	(C ₆ -C ₁₀)	(>C ₁₀ -C ₂₈)	Cl*
LAB NUMBER SAMPLE ID	(mg/kg)	(mg/kg)	(mg/kg)

ANALYSIS DATE	03/21/10	03/21/10	03/19/10
H19482-1 SOURCE BTM GRAB @ 12FT.	<10.0	<10.0	32
Quality Control	511	521	480
True Value QC	500	500	500
% Recovery	102	104	96.0
Relative Percent Difference	1.1	3.6	4.1

COPY

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

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

Reported on wet weight.

Cheryl Kume
 Chemist

03/23/10
 Date

H19482 TCL RICE

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. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



ARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603
(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325)673-7020

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: Rice Operating Company		BILL TO		ANALYSIS REQUEST																									
Project Manager: Bruce Baker		P.O. #:		Chlorides TPH 8015 M BTEX Texas TPH																									
Address: 122 West Taylor		Company:																											
City: Hobbs State: NM Zip: 88240		Attn:																											
Phone #: 575-393-9174 Fax #: 575-397-1471		Address:																											
Project #: Project Owner:		City:																											
Project Name: EME JCT G-20 19/37		State: Zip:																											
Project Location: EME JCT G-20 19/37		Phone #:																											
Sampler Name: Jordan Woodfin		Fax #:																											
FOR LAB USE ONLY	Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX					PRESERV.		SAMPLING																	
					GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE	ICE / COOL	OTHER:	DATE	TIME														
	H19482-1	Source btm grab @ 12 ft	G	1			✓					✓		3-18-10	1:00pm	✓	✓												
																		COPY											

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 analysis. 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.

Relinquished By: Jordan Woodfin	Date: 3-18-10 Time:	Received By:	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
Relinquished By:	Date: 3/18/10 Time: 4:25	Received By: <i>Jodi Henson</i>	Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Delivered By: (Circle One) <input checked="" type="checkbox"/> Sampler - UPS - Bus - Other:	Sample Condition Cool Intact <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	CHECKED BY: (Initials) <i>JH</i>	REMARKS: email results jwoodfin@riceswd.com; jpurvis@riceswd.com bbaker@riceswd.com	

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

#26

NEED SAMPLES BACK, PLEASE

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 Serial No: 590-000183
 Model: PGM 7300 Serial No: 590-000508
 Model: PGM 7300 Serial No: 590-000504

Model: PGM 7600 Serial No: 110-023920
 Model: PGM 7600 Serial No: 110-013744
 Model: PGM 7600 Serial No: 110-013676

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO : 924503	EXPIRATION DATE: 7-5-12
FILL DATE: 7-1-09	METER READING ACCURACY: 99.5

ACCURACY : +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	G-20	G	20	19S	37E

SAMPLE ID	PID	SAMPLE ID	PID
Source			
9'	0.7		
10'	0.5		
11'	0.9		
12'	0.1		

COPY

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

SIGNATURE:

DATE: 3-18-10

EME Jct. G-20
UL/G, Section 20, T19S, R37E



Facing east

2/6/2013



Facing west

2/6/2013