

1R - 427-115

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, August 14, 2013 6:05 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 (1R427-115) Termination - ROC EME U6 Site

**RE: Termination Request
for the Rice Operating Company's
EME U6 Site
Unit Letter U, Section 6, T21S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-115) 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 August 9, 2013 (received August 14, 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 (1R427-115) 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 9361

August 9, 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

RECEIVED OGD
2013 AUG 14 P 2:27

RE: Termination Request
EME U6 (1R427-115): UL/U, Sec. 6, T21S, R36E
RICE Operating Company – Eunice Monument Eumont (EME) 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 and Previous Work

In 2001, ROC initiated work on the former U6 junction box. The site is located in UL U, Sec. 6, T21S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 157 +/- feet. The site was delineated using a backhoe to form a 12x10x6-ft deep excavation and soil samples were screened at regular intervals for both hydrocarbons and chlorides. Each sample was field titrated for chlorides, resulting in low concentrations. Representative composite samples of the sidewalls and bottom were submitted to a commercial laboratory to be analyzed for chloride, TPH, and BTEX. The sidewall composite resulted in a chloride concentration of 182 mg/kg and concentrations of gasoline range organics (GRO), diesel range organics (DRO) and BTEX below detectable limits. The bottom composite resulted in a chloride concentration of 149 mg/kg and concentrations of GRO, DRO and BTEX below detectable limits. A compacted clay liner was installed and will provide a barrier that will inhibit the downward migration of chlorides to groundwater. The excavation was backfilled to ground surface and contoured to the surrounding area. Vegetation has rebounded at this site so no further action is warranted. Vegetation above the liner will also provide a natural infiltration barrier for the site since plants capture water through their roots thereby reducing the volume of water

moving through the vadose zone to groundwater. A new, watertight junction box was built over the site location and has since been eliminated.

The junction box site maps, final report, laboratory analysis 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.

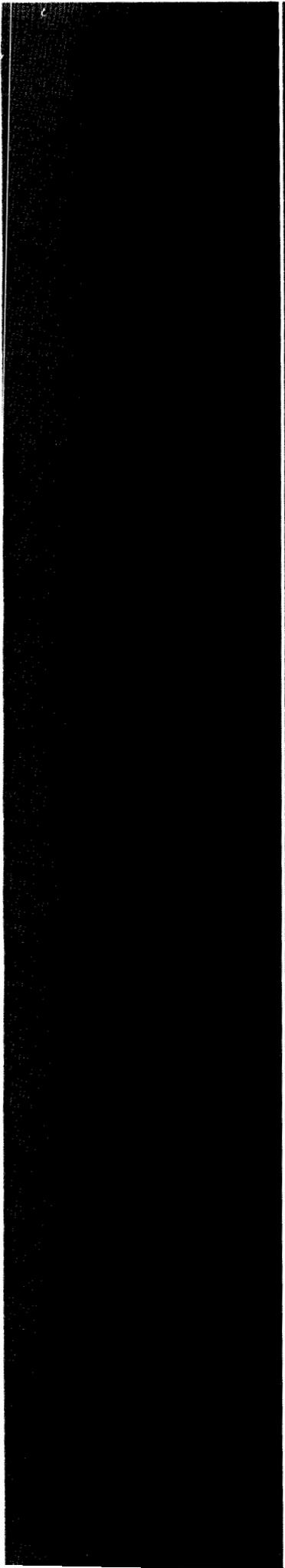
Please contact me at (575)393-2967 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,
RICE Operating Company

A handwritten signature in black ink, appearing to read "H. Conder", with a long, sweeping horizontal stroke at the end.

Hack Conder
Environmental Manager

enclosures



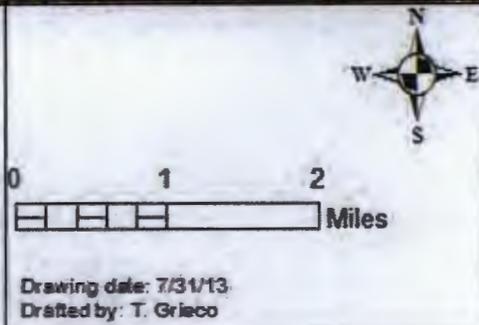
Site Maps

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

Site Location Map



EME
U6
UL U SECTION 6
T-21-S R-36-E
LEA COUNTY, NM
CASE # 1R427-115



Area Map



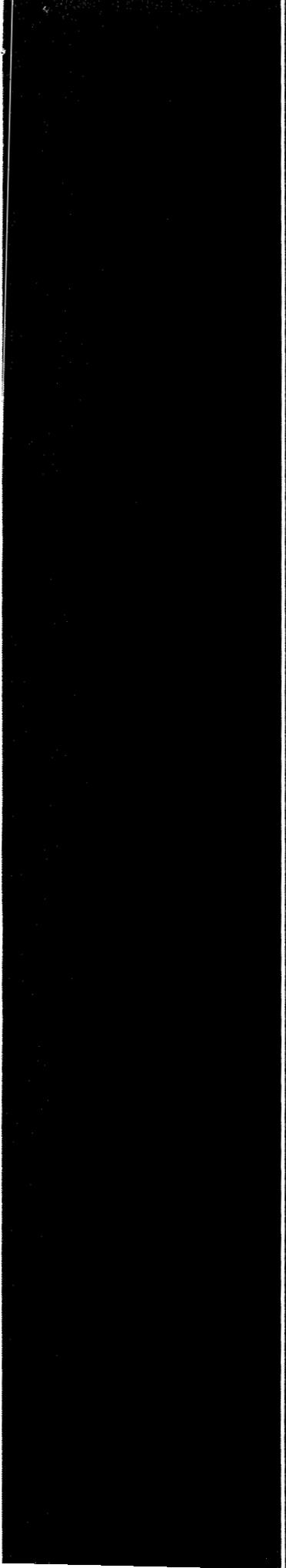
EME U6

UL U SECTION 6
T-21-S R-36-E
LEA COUNTY, NM

CASE #: 1R427-115



Drawing date: 7/31/13
Drafted by: T. Grieco



Junction Box Report

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



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

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

ANALYTICAL RESULTS FOR
 RICE OPERATING CO.
 ATTN: JAMES STURGILL
 122 W. TAYLOR
 HOBBS, NM 88240
 FAX TO:

Receiving Date: 01/02/01
 Reporting Date: 01/04/01
 Project Number: NOT GIVEN
 Project Name: U-6 SIDES AND BOTTOM
 Project Location: U-SEC6-T21-R36

Sampling Date: 01/02/01
 Sample Type: SOIL
 Sample Condition: COOL & INTACT
 Sample Received By: B C
 Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (>C ₁₀ -C ₂₈) (mg/Kg)	Cl* (mg/Kg)
	ANALYSIS DATE	01/03/01	01/03/01	01/04/01
H5486-1	U-6 BOTTOM	<50	<50	149
H5486-2	U-6 SIDES	<50	<50	182
	Quality Control	929	1049	1004
	True Value QC	1000	1000	1000
	% Recovery	92.9	105	100
	Relative Percent Difference	8.5	7.8	7.2

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

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

Burton A. Cashe
 Chemist

1/4/01
 Date

H5486A.XLS

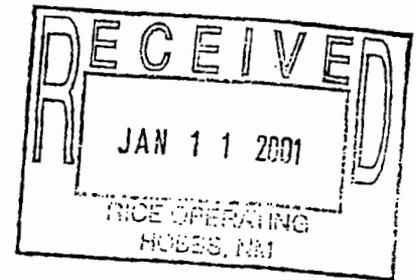
PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived 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.



**ARDINAL
LABORATORIES**

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

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



ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: JAMES STURGILL
122 W. TAYLOR
HOBBS, NM 88240
FAX TO:

Receiving Date: 01/02/01
Reporting Date: 01/05/01
Project Number: U-6 SIDE AND BOTTOM
Project Name: U-6 SIDES AND BOTTOM
Project Location: U-SEC 6 - T-21 R-36

Sampling Date: 01/02/01
Sample Type: SOIL
Sample Condition: COOL, INTACT
Sample Received By: BC-HOBBS
Analyzed By: JA

LAB NUMBER	SAMPLE ID	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE		01/04/01	01/04/01	01/04/01	01/04/01
H5486-1	U-6 BOTTOM	<0.002	<0.002	<0.002	<0.006
H5486-2	U-6 SIDES	<0.002	<0.002	<0.002	<0.006
Quality Control		0.092	0.096	0.087	0.262
True Value QC		0.100	0.100	0.100	0.300
% Accuracy		92	96	87	87
Relative Percent Difference		4.9	2.8	2.4	2.3

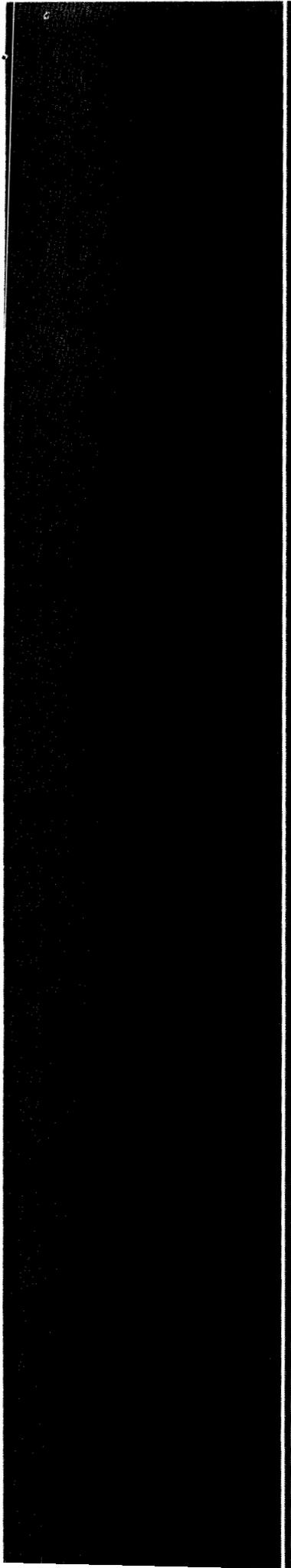
METHOD: EPA SW 846-8020, 5030, Gas Chromatography


Chemist

1-5-01
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 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.

H5486SHOBBSRICEBTEXONLY



Current Photodocumentation

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

EME U6 (1R427-115)
Unit Letter U, Section 6, T21S, R36E



Facing west

7/16/2013



Facing south

7/16/2013