

1R - 427-104

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, August 15, 2013 3:59 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 (1R427-104) Termination - ROC EME O-17-1 Site

**RE: Termination Request
for the Rice Operating Company's
EME O-17-1 Site
Unit Letter O, Section 17, T20S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-104) 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 (1R427-104) 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

RE: Termination Request
EME O-17-1 (1R427-104): UL/O, Sec. 17, T20S, R37E
RICE Operating Company – Eunice Monument Eumont (EME) SWD System

RECEIVED OOD
2013 AUG 14 P 2:27

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 O-17-1 junction box. The site is located in UL O, Sec. 17, T20S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 27 +/- feet. The site was delineated using a backhoe to form a 20x15x8.5-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 112 mg/kg and concentrations of gasoline range organics (GRO), diesel range organics (DRO) and BTEX below detectable limits. The bottom field composite at 6.5 ft below ground surface (bgs) sample resulted in a DRO concentration of 72.2 mg/kg and concentrations of GRO and BTEX below detectable limits. The site was further delineated to 8.5 ft bgs where a bottom composite sample was submitted to a commercial laboratory for analysis of chlorides, resulting in a concentration of 384 mg/kg. A compacted clay layer was installed and will provide a barrier that will inhibit the downward migration of chlorides to groundwater. A total of 30 cubic yards of excavated soil was properly disposed of at a NMOCD approved facility. The excavation was backfilled with clean topsoil to ground surface

and contoured to the surrounding area. The site is located adjacent to a facility and lease road; therefore, no seeding of the site is warranted. A new, watertight junction box was installed at the site.

The junction box site maps, final report, laboratory analysis, disposal manifests 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 underline.

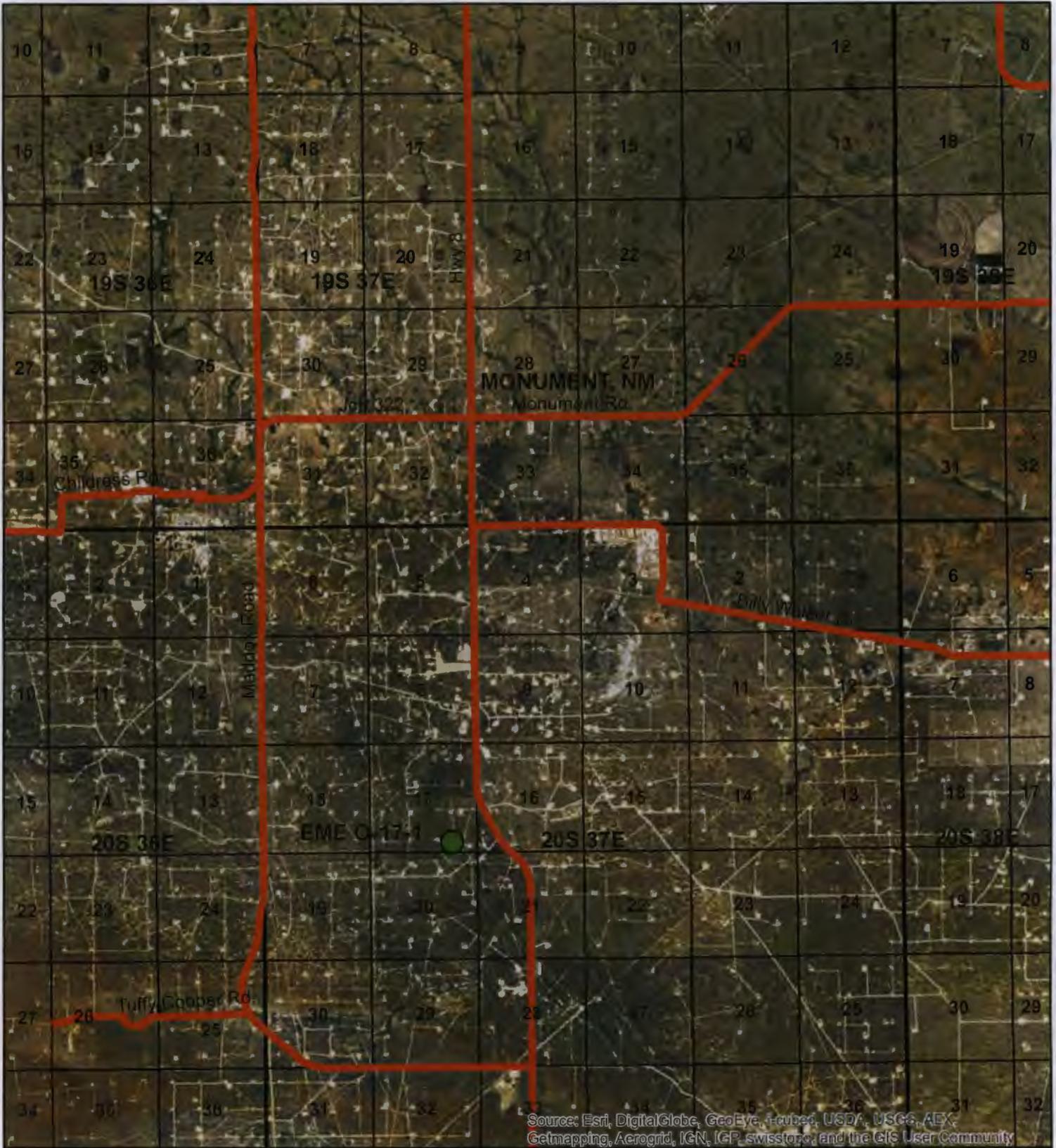
Hack Conder
Environmental Manager

enclosures

Site Maps

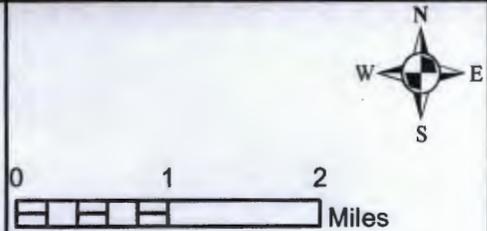
RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471

Site Location Map



EME
O-17-1
UL O SECTION 17
T-20-S R-37-E
LEA COUNTY, NM

CASE # 1R427-104



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

Area Map



Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AFX, Getmapping, Aergrid, IGN, IGP, swisstopo, and the GIS User Community



EME
O-17-1
UL O SECTION 17
T-20-S R-37-E
LEA COUNTY, NM

CASE #: 1R427-104

0 500 1,000
[Scale bar] Feet

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

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

427-109

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
							Length	Width	Depth
EME	O-17-1	O	17	20S	37E	LEA	10	10	5

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

Depth to Groundwater 27 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 08/17/2001 Date Completed 08/31/2001 OCD Witness NO

Soil Excavated 80 cubic yards Excavation Length 20 Width 15 Depth 8.5 feet

Soil Disposed 30 cubic yards Offsite Facility SOUTH MONUMENT Location MONUMENT, NM

FINAL ANALYTICAL RESULTS: Sample Date 08/24/2001 Sample Depth 8.5'

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	Benzene mg/kg	Toluene mg/kg	Ethyl Benzene mg/kg	Total Xylenes mg/kg	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SIDEWALLS	<0.005	<0.005	<0.005	<0.015	<50	<50	112
BOTTOM	<0.005*	<0.005*	<0.005*	<0.015*	<50*	72.2*	384

General Description of Remedial Action: The site was delineated vertically and laterally and field tests indicated impact at 12' bgs was 80 ppm. Composite samples at 6.5' bgs were taken to a certified lab for analysis. The chloride results on the bottom composite was 3580 ppm. Another 2' of impacted soil was removed from the bottom and field tested at 300 ppm chloride. A compacted clay barrier to inhibit vertical transmissivity and water proof junction box was installed and backfilled with clean soil.
* TPH and BTEX were taken at 6.5' bgs.

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS	5'	100
BOTTOM	8.5	300
Vertical Trench	12'	80

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

DATE December 3, 2001 PRINTED NAME D. E. Anderson
SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental



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: CHRIS RODRIGUEZ
122 W. TAYLOR
HOBBS, NM 88240
FAX TO:

Receiving Date: 08/17/01
Reporting Date: 08/20/01
Project Owner: RICE
Project Name: 0-17-1 BOX UPGRADE
Project Location: E.M.E.

Sampling Date: 08/17/01
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: AH
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)
ANALYSIS DATE		08/17/01	08/17/01	08/20/01
H6094-1	WALL COMP.	<50	<50	112
H6094-2	BOTTOM COMP.	<50	72.2	3580
Quality Control		790	808	970
True Value QC		800	800	1000
% Recovery		98.7	101	97.0
Relative Percent Difference		1.4	3.0	3.2

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

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

Burton J. Cooke
Chemist

8/20/01
Date



H6094A.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 rendered by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



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: CHRIS RODRIGUEZ
 122 W. TAYLOR
 HOBBS, NM 88240
 FAX TO:

Receiving Date: 08/17/01
 Reporting Date: 08/20/01
 Project Owner: RICE
 Project Name: 0-17-1 BOX UPGRADE
 Project Location: E.M.E.

Sampling Date: 08/17/01
 Sample Type: SOIL
 Sample Condition: COOL & INTACT
 Sample Received By: AH
 Analyzed By: BC

LAB NO.	SAMPLE ID	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
	ANALYSIS DATE	08/17/01	08/17/01	08/17/01	08/17/01
H6094-1	WALL COMP.	<0.005	<0.005	<0.005	<0.015
H6094-2	BOTTOM COMP.	<0.005	<0.005	<0.005	<0.015
	Quality Control	0.106	0.099	0.105	0.310
	True Value QC	0.100	0.100	0.100	0.300
	% Recovery	106	98.6	105	103
	Relative Percent Difference	6.8	8.5	11.6	11.6

METHOD: EPA SW-846 8260

Burton A. Coche
 Chemist

8/20/01
 Date



H6094B.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.



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: CHRIS RODRIGUEZ
 122 W. TAYLOR
 HOBBS, NM 88240
 FAX TO: (505) 397-1471

Receiving Date: 08/21/01

Reporting Date: 08/21/01

Project Number: 0-17-1

Project Name: BOTTOM COMPOSITE OF 0-17-1 E.M.E

Project Location: E.M.E.

Analysis Date: 08/21/01

Sampling Date: 08/20/01

Sample Type: SOIL

Sample Condition: COOL & INTACT

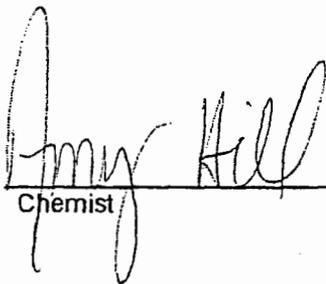
Sample Received By: BC

Analyzed By: AH

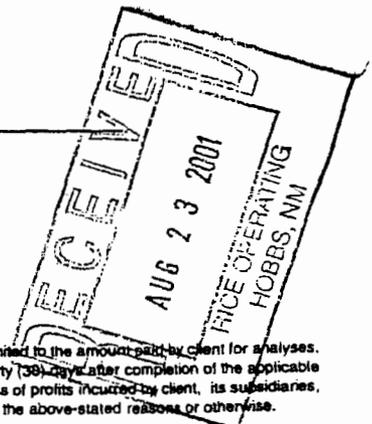
LAB NUMBER	SAMPLE ID	Cl ⁻ (mg/Kg)
H6099-1	8 1/2' BGS BOTTOM COMPOSITE	384
Quality Control		970
True Value QC		1000
% Recovery		97.0
Relative Percent Difference		3.2

METHOD: Standard Methods 4500-Cl⁻B

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


 Chemist

8-21-01
 Date



H6099A.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, 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: <i>Rice Operating</i>		BILL TO		ANALYSIS REQUEST											
Project Manager: <i>Chris Rodriguez</i>		P.O. #:		<i>Chlorides</i>											
Address: <i>122 W. Taylor</i>		Company: <i>Rice</i>													
City: <i>Hobbs</i> State: <i>N.M.</i> Zip: <i>88240</i>		Attn: <i>Chris Rodriguez</i>													
Phone #: <i>393-9174</i> Fax #: <i>397-1471</i>		Address: <i>122 W. Taylor</i>													
Project #: 0-17-1 Project Owner: <i>Rice</i>		City: <i>Hobbs</i>													
Project Name: <i>Bottom Composite of 8-4-1 0-17-1 E.M.E</i>		State: <i>N.M.</i> Zip: <i>88240</i>													
Project Location: 8-4-1 <i>E.M.E</i>		Phone #: <i>393-9174</i>													
Sampler Name:		Fax #: <i>397-1471</i>													
FOR LAB USE ONLY															
Lab I.D.	Sample I.D.	(GRAB OR C)OMP.	# CONTAINERS	MATRIX					PRESERV			SAMPLING		DATE	TIME
				GROUNDWATER	WASTEWATER	SOIL	CRUDE OIL	SLUDGE	OTHER:	ACID/BASE:	ICE / COOL	OTHER:			
<i>HC099-1</i>	<i>8's Bottom Composite 8-4-1</i>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>							<i>2/20/01</i>	<i>4:45pm</i>	<input checked="" type="checkbox"/>	

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 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.

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: <i>2/21/01</i>	Received By:		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
<i>Chris Rodriguez</i>		Time: <i>11:45 AM</i>	<i>Bureau of Land Management</i>		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
		Date:			Time:	REMARKS:
Relinquished By:		Date:	Received By: (Lab Staff)		<i>TEXT if CL < 250 mg/Kg</i>	
Delivered By: (Circle One)		Time:	<i>Bureau of Land Management</i>			
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				

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

SOUTH MONUMENT SURFACE WASTE FACILITY

TICKET NO # 4450

LEASE OPERATOR
Rice Operating Corporation

ORIGINATING LOCATION: ~~P-25-1~~ ~~8-17~~ C-17
~~Sec 36 T19S R36E~~
~~Sec T-20 R-37~~
87

TRANSPORTER NAME & ADDRESS

WALTON CONSTRUCTION CO., INC.
P. O. BOX 478
HOBBS, NM 88241-0478

Attn: KENA KAY COOPER

DESCRIPTION OF WASTE

Non-Hazardous Hydrocarbons

QUANTITY

18 yd

FACILITY CONTACT:

Jane S. Legen
SIGNATURE OF CONTACT

8/31/01
DATE

CELL NUMBER MATERIAL WAS PLACE IN LANDFARM: B-1

NAME OF TRANSPORTER (DRIVER):

Lupe S. Williams
SIGNATURE OF DRIVER

8-31-2001
DATE

DISPOSAL SITE

South Monument Surface Waste Facility
P. O. Box 418
Hobbs, NM 88241-0418
Sec 25 T20S R36E N/2NE/4

"As a condition of acceptance for disposal, I hereby certify that this waste is an exempt waste as defined by the Environmental Protection Agency (EPA). The waste are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C regulations; and not mixed with non-exempt waste."

Jane S. Legen
FACILITY REPRESENTATIVE

8/31/01
DATE

SOUTH MONUMENT SURFACE WASTE FACILITY

4462

TICKET NO #

~~4462~~

LEASE OPERATOR

ORIGINATING LOCATION: ~~25 18~~ 0-17

~~WALTON CONSTRUCTION CO., INC.~~

Rice Operating

Sec -17- T-20 R37

TRANSPORTER NAME & ADDRESS

~~WALTON CONSTRUCTION CO., INC.~~

~~P. O. BOX 478~~

~~HOBBS, NM 88241-0478~~

Attn: KENA KAY COOPER

DESCRIPTION OF WASTE

QUANTITY

Non-Hazardous Hydrocarbons

12

FACILITY CONTACT

SIGNATURE OF CONTACT

[Handwritten Signature]

DATE

8/31/01

CELL NUMBER MATERIAL WAS PLACE IN LANDFARM:

B-1

NAME OF TRANSPORTER (DRIVER):

SIGNATURE OF DRIVER

[Handwritten Signature]

DATE

8/31/01

DISPOSAL SITE

South Monument Surface Waste Facility
P. O. Box 418
Hobbs, NM 88241-0418
Sec 25 T20S R36E N/2NE/4

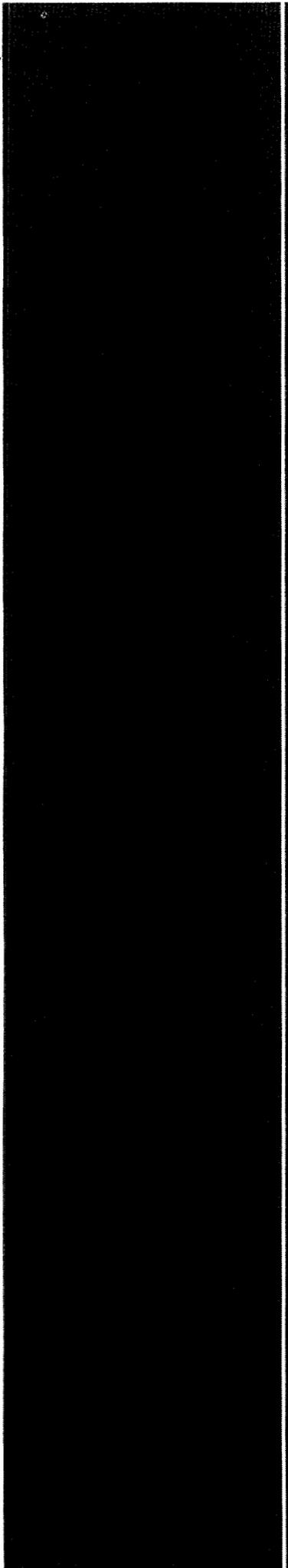
"As a condition of acceptance for disposal, I hereby certify that this waste is an exempt waste as defined by the Environmental Protection Agency (EPA). The waste are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C regulations; and not mixed with non-exempt waste."

FACILITY REPRESENTATIVE

[Handwritten Signature]

DATE

8/31/01



Current Photodocumentation

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

EME O-17-1 (1R427-104)
Unit Letter O, Section 17, T20S, R37E



Facing west

7/3/2013



Facing north

7/3/2013