Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, November 07, 2013 4:21 PM
To: Hack Conder (hconder@riceswd.com)
Cc: VonGonten, Glenn, EMNRD; Lowe, Leonard, EMNRD; Leking, Geoffrey R, EMNRD; Katie Jones <kjones@riceswd.com> (kjones@riceswd.com); lflores@rice-ecs.com; Scott Curtis (scurtis@riceswd.com)
Subject: Remediation Plan (1R427-192) Termination - ROC EME Jct E-25 Site

RE: Termination Request
for the Rice Operating Company's
EME Jct E-25 Site
Unit Letter E, Section 25, T19S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-192) 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 October 15, 2013 (received October 24, 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 (1R427-192) 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 8982

October 15, 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. E-25 (1R427-192): UL/E, Sec. 25, T19S, 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 2004, ROC initiated work on the former E-25 junction box. The site is located in UL E, Sec. 25, T19S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 57 +/- feet. The site was delineated with two trenches being completed to a depth of 12 ft bgs. One trench was excavated directly under the former junction box location and one 5 ft north of the former junction box. Soil samples were screened at regular intervals for both hydrocarbons and chlorides. Each sample was field titrated for chlorides and screened for TPH, resulting in low concentrations for chlorides and TPH. The 12 ft sample was sent to a commercial laboratory for analysis, resulting in a chloride, gasoline range organics (GRO) and a diesel range organics (DRO) concentration below detectable limits. The excavation was backfilled with the excavated soil to ground surface and contoured to the surrounding area.

Vegetation has rebounded at this site; 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. A junction box is no longer needed at this site.

The junction box site location map, area map, final report, photodocumentation, chloride graphs, laboratory analysis, PID sheet 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

L Flores

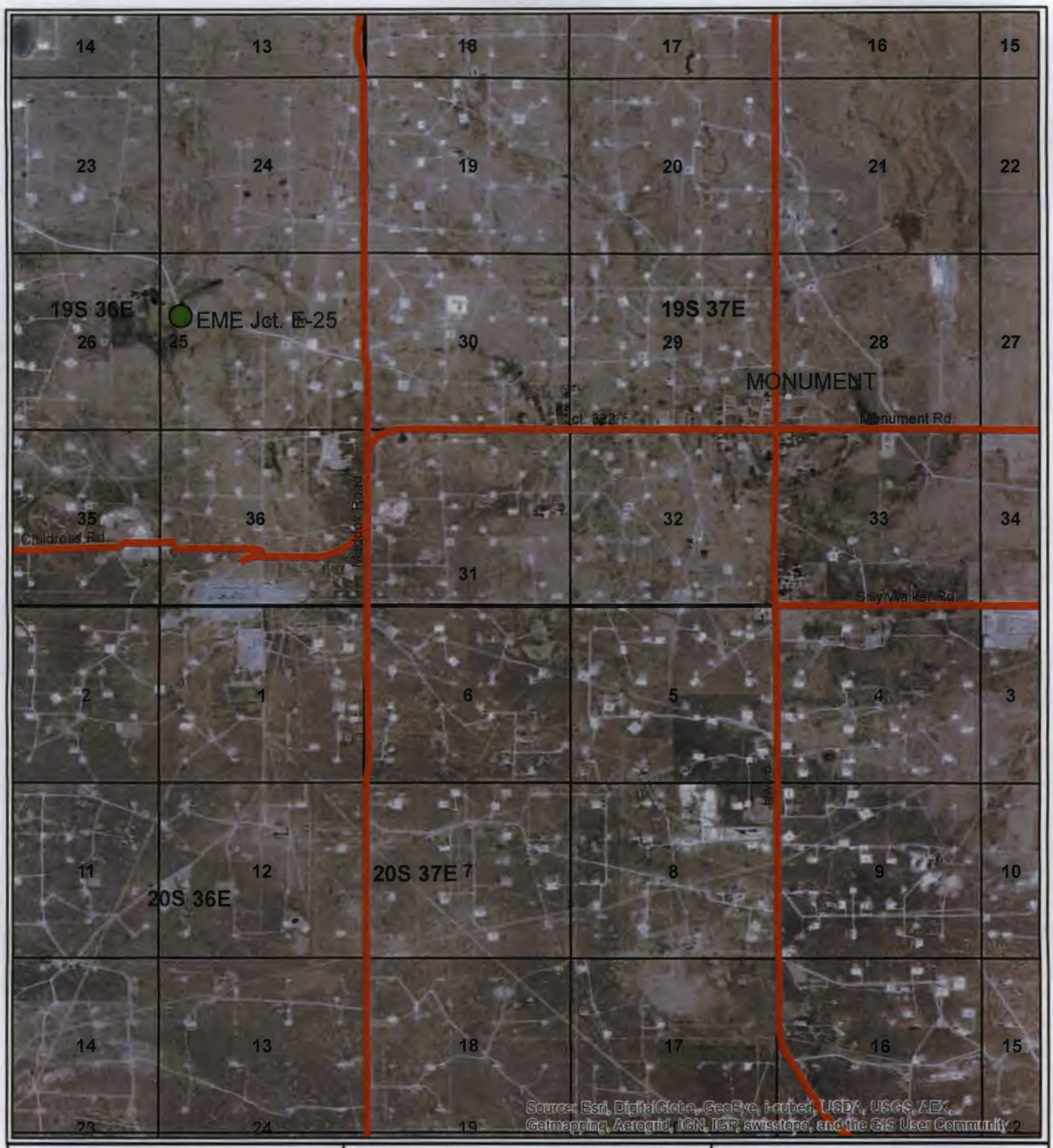
Laura Flores
Environmental Project Assistant Manager

enclosures

Site Maps

RICE *Operating Company* (ROC)
419 West Cain Hobbs, NM 88240
Phone: (575) 393-2967 Fax: (575) 393-0293

SITE MAP



RICE ENVIRONMENTAL RECS CONSULTING & SAFETY, LLC

EME Jct. E-25

1R427-192
UL/E
Sec. 34-T19S-R36E

N
W E
S

0 10 20
Feet

Drawing date: 10/15/2013 JS

AREA MAP

RICE ENVIRONMENTAL CONSULTING & SAFETY, LLC

RECS

EME
Jct. E-25

1R427-192
UL/E
Sec. 25-T19S-R36E

N
W E
S

0 10 20
Feet

Drawing date: 10/10/2013 JS

Junction Box Report

RICE *Operating Company* (ROC)
419 West Cain Hobbs, NM 88240
Phone: (575) 393-2967 Fax: (575) 393-0293

RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
							Length	Width	Depth
EME	E-25	E	25	19S	36E	Lea	no box--eliminated		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER Jimmy Cooper OTHER _____

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

Date Started 9/15/2004 Date Completed 4/5/2005 NMOCD Witness no

2 trenches were completed--one 12 ft deep & one 6 ft deep

Soil Excavated 18 cubic yards Excavation Length _____ Width _____ Depth _____ feet

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

FINAL ANALYTICAL RESULTS: Sample Date 9/15/2004 Sample Depth 12 ft

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

Sample Location	PID ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
GRAB--vertical trench at junction 12 ft BGS	0.0	<10.0	<10.0	<20

CHLORIDE FIELD TESTS

LOCATION	DEPTH (ft)	ppm
vertical trench at junction	4	179
	6	179
	8	89
	10	89
	12	89
5 ft NORTH of junction	1	599
	2	149
	3	89
	4	89
	5	89
	6	89
background	0.5	89

General Description of Remedial Action: This junction has been eliminated/ There were no physical indications of chloride or hydrocarbon impact. The box lumber was removed and the site was delineated using a backhoe while PID screenings and chloride field tests were conducted at regular intervals. Two excavation trenches were completed--one directly under the former box location and one 5 ft north of the junction. All PID readings were 0.0 ppm except for two samples which were only slighting above at 1.7 and 1.5 ppm. Chloride field tests revealed very low concentrations, indicative of background levels. Both trenches exhibited chloride levels with concentrations that conclusively declined with depth. A representative grab sample was collected for lab analysis at 12 ft BGS from the trench at the junction box site. Analysis yielded non-detect TPH (<10.0 ppm) and chloride (<20 ppm) concentrations. The trenches were backfilled with the excavated soil. The disturbed surface is expected to return to productive capacity at a normal rate.

* a water well and housing located 987 ft northwest of this site.

enclosures: chloride graphs, photos, lab results, PID field screenings

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

SITE SUPERVISOR Rob Elam SIGNATURE not available COMPANY Curt's Environmental--Odessa, TX

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE Kristin Farris Pope

DATE 4/13/2005 TITLE Project Scientist

EME jct. E-25

undisturbed box (looking west) 8/20/2004

delineation trenches at former box site 9/15/2004

delineation trenches (looking west) 9/15/2004

backfilled 4/5/2004

EME jct. E-25

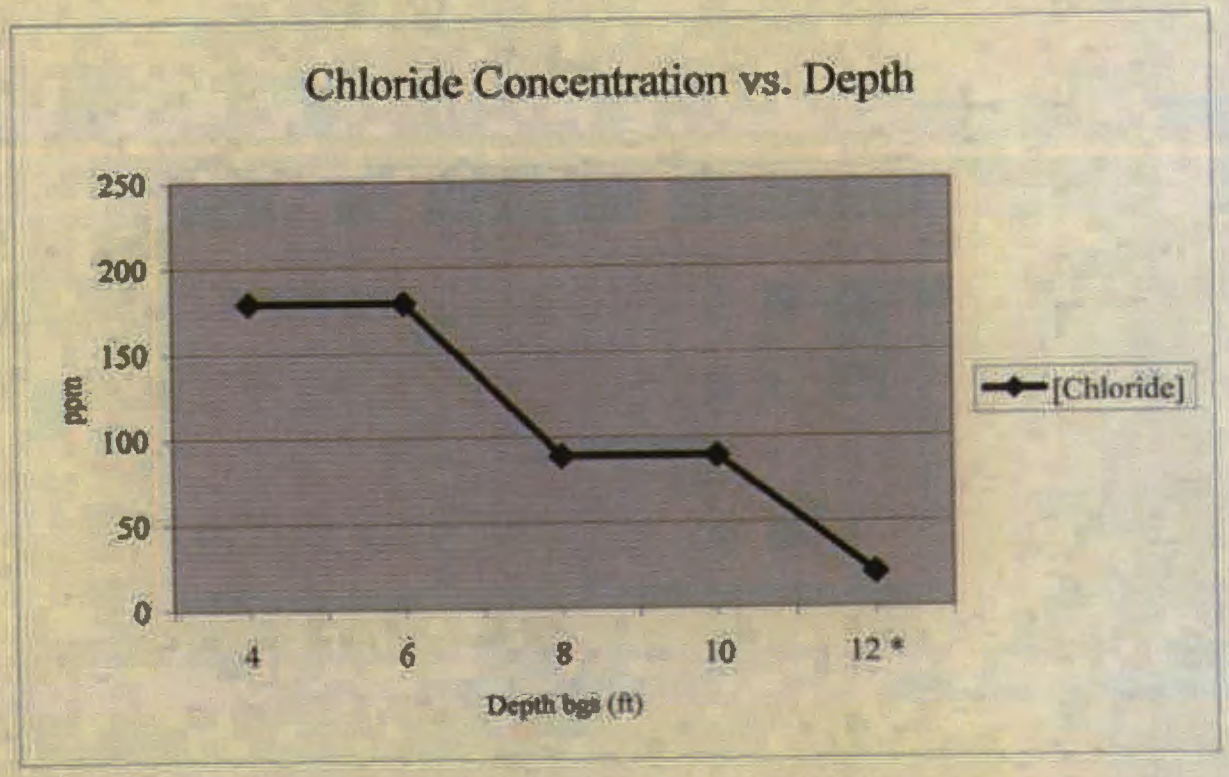
T19S, R36E

Vertical Delineation at Source

Depth bgs (ft)	[Cl⁻] ppm
4	179
6	179
8	89
10	89
12 *	20

* lab test = <20 ppm;
field test = 89 ppm

Groundwater = 57 ft



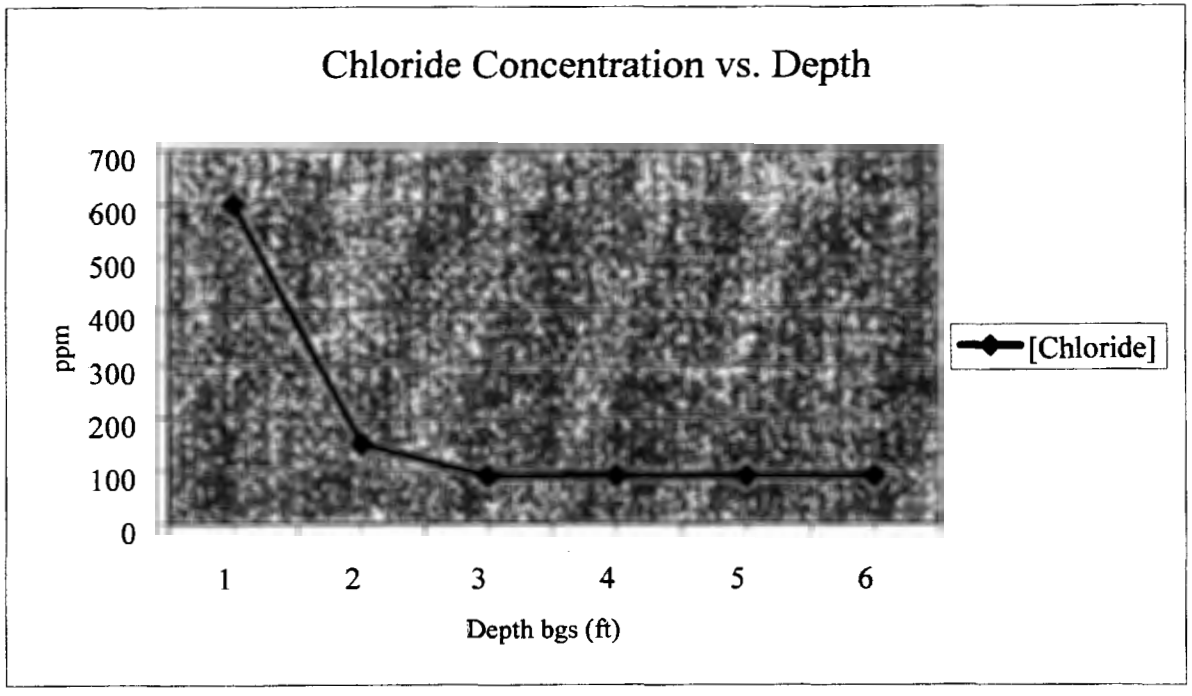
EME jct. E-25

T19S, R36E

5 ft NORTH of junction

Depth bgs (ft)	[Cl] ppm
1	599
2	149
3	89
4	89
5	89
6	89

Groundwater = 57 ft



ENVIRONMENTAL LAB OF

12600 West I-20 East - Odessa, Texas 79765

COPY

Analytical Report

Prepared for:

Roy Rascon

Rice Operating Co.

122 W. Taylor

Hobbs, NM 88240

Project: EME Jct. E-25

Project Number: None Given

Location: RRR

Lab Order Number: 4116007

Report Date: 09/22/04

Rice Operating Co.	Project: EME Jct. E-25	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	09/22/04 10:01

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
12' Source	4116007-01	Soil	09/15/04 10:30	09/16/04 08:00

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Rice Operating Co.	Project: EME Jct. E-25	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	09/22/04 10:01

Organics by GC

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
12' Source (4I16007-01) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EI41719	09/17/04	09/19/04	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*96.4 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*88.0 %*	*70-130*		"	"	"	"	

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Rice Operating Co.	Project: EME Jct. E-25	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	09/22/04 10:01

General Chemistry Parameters by EPA / Standard Methods

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
12' Source (4116007-01) Soil									
Chloride	ND	20.0	mg/kg Wet	2	EI42112	09/16/04	09/21/04	SW 846 9253	
% Solids	**85.0**		%	1	EI41707	09/16/04	09/16/04	% calculation	

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Rice Operating Co.	Project: EME Jct. E-25	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	09/22/04 10:01

Organics by GC - Quality Control

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EI41719 - Solvent Extraction (GC)										
Blank (EI41719-BLK1)				Prepared: 09/17/04 Analyzed: 09/19/04						
Gasoline Range Organics C6-C12	ND	10.0	mg/kg wet							
Diesel Range Organics >C12-C35	ND	10.0	"							
Total Hydrocarbon C6-C35	ND	10.0	"							
Surrogate: 1-Chlorooctane	*44.2*		*mg/kg*	*50.0*		*88.4*	*70-130*			
Surrogate: 1-Chlorooctadecane	*41.8*		"	*50.0*		*83.6*	*70-130*			
Blank (EI41719-BLK2)				Prepared: 09/17/04 Analyzed: 09/19/04						
Gasoline Range Organics C6-C12	ND	10.0	mg/kg wet							
Diesel Range Organics >C12-C35	ND	10.0	"							
Total Hydrocarbon C6-C35	ND	10.0	"							
Surrogate: 1-Chlorooctane	*48.3*		*mg/kg*	*50.0*		*96.6*	*70-130*			
Surrogate: 1-Chlorooctadecane	*36.3*		"	*50.0*		*72.6*	*70-130*			
LCS (EI41719-BS1)				Prepared: 09/17/04 Analyzed: 09/19/04						
Gasoline Range Organics C6-C12	426	10.0	mg/kg wet	500		85.2	75-125			
Diesel Range Organics >C12-C35	498	10.0	"	500		99.6	75-125			
Total Hydrocarbon C6-C35	924	10.0	"	1000		92.4	75-125			
Surrogate: 1-Chlorooctane	*51.3*		*mg/kg*	*50.0*		*103*	*70-130*			
Surrogate: 1-Chlorooctadecane	*56.4*		"	*50.0*		*113*	*70-130*			
LCS (EI41719-BS2)				Prepared: 09/17/04 Analyzed: 09/19/04						
Gasoline Range Organics C6-C12	415	10.0	mg/kg wet	500		83.0	75-125			
Diesel Range Organics >C12-C35	505	10.0	"	500		101	75-125			
Total Hydrocarbon C6-C35	920	10.0	"	1000		92.0	75-125			
Surrogate: 1-Chlorooctane	*54.0*		*mg/kg*	*50.0*		*108*	*70-130*			
Surrogate: 1-Chlorooctadecane	*44.3*		"	*50.0*		*88.6*	*70-130*			
Calibration Check (EI41719-CCV1)				Prepared: 09/17/04 Analyzed: 09/19/04						
Gasoline Range Organics C6-C12	425		mg/kg	500		85.0	80-120			
Diesel Range Organics >C12-C35	520		"	500		104	80-120			
Total Hydrocarbon C6-C35	945		"	1000		94.5	80-120			
Surrogate: 1-Chlorooctane	*52.0*		"	*50.0*		*104*	*70-130*			
Surrogate: 1-Chlorooctadecane	*47.9*		"	*50.0*		*95.8*	*70-130*			

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Rice Operating Co.	Project: EME Jct. E-25	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	09/22/04 10:01

Organics by GC - Quality Control

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EI41719 - Solvent Extraction (GC)										
Calibration Check (EI41719-CCV2)				Prepared: 09/17/04 Analyzed: 09/19/04						
Gasoline Range Organics C6-C12	427		mg/kg	500		85.4	80-120			
Diesel Range Organics >C12-C35	483		"	500		96.6	80-120			
Total Hydrocarbon C6-C35	910		"	1000		91.0	80-120			
Surrogate: 1-Chlorooctane	*51.6*		"	*50.0*		*103*	*70-130*			
Surrogate: 1-Chlorooctadecane	*47.0*		"	*50.0*		*94.0*	*70-130*			
Matrix Spike (EI41719-MS1)	**Source: 4I16003-01**			Prepared: 09/17/04 Analyzed: 09/19/04						
Gasoline Range Organics C6-C12	469	10.0	mg/kg dry	521	ND	90.0	75-125			
Diesel Range Organics >C12-C35	555	10.0	"	521	ND	107	75-125			
Total Hydrocarbon C6-C35	1020	10.0	"	1040	ND	98.1	75-125			
Surrogate: 1-Chlorooctane	*55.9*		*mg/kg*	*50.0*		*112*	*70-130*			
Surrogate: 1-Chlorooctadecane	*52.5*		"	*50.0*		*105*	*70-130*			
Matrix Spike (EI41719-MS2)	**Source: 4I17004-13**			Prepared: 09/17/04 Analyzed: 09/19/04						
Gasoline Range Organics C6-C12	506	10.0	mg/kg dry	549	ND	92.2	75-125			
Diesel Range Organics >C12-C35	627	10.0	"	549	15.3	111	75-125			
Total Hydrocarbon C6-C35	1130	10.0	"	1100	15.3	101	75-125			
Surrogate: 1-Chlorooctane	*55.1*		*mg/kg*	*50.0*		*110*	*70-130*			
Surrogate: 1-Chlorooctadecane	*54.7*		"	*50.0*		*109*	*70-130*			
Matrix Spike Dup (EI41719-MSD1)	**Source: 4I16003-01**			Prepared: 09/17/04 Analyzed: 09/19/04						
Gasoline Range Organics C6-C12	478	10.0	mg/kg dry	521	ND	91.7	75-125	1.90	20	
Diesel Range Organics >C12-C35	577	10.0	"	521	ND	111	75-125	3.89	20	
Total Hydrocarbon C6-C35	1060	10.0	"	1040	ND	102	75-125	3.85	20	
Surrogate: 1-Chlorooctane	*57.5*		*mg/kg*	*50.0*		*115*	*70-130*			
Surrogate: 1-Chlorooctadecane	*53.8*		"	*50.0*		*108*	*70-130*			
Matrix Spike Dup (EI41719-MSD2)	**Source: 4I17004-13**			Prepared: 09/17/04 Analyzed: 09/19/04						
Gasoline Range Organics C6-C12	522	10.0	mg/kg dry	549	ND	95.1	75-125	3.11	20	
Diesel Range Organics >C12-C35	630	10.0	"	549	15.3	112	75-125	0.477	20	
Total Hydrocarbon C6-C35	1150	10.0	"	1100	15.3	103	75-125	1.75	20	
Surrogate: 1-Chlorooctane	*57.0*		*mg/kg*	*50.0*		*114*	*70-130*			
Surrogate: 1-Chlorooctadecane	*57.5*		"	*50.0*		*115*	*70-130*			

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Rice Operating Co.	Project: EME Jct. E-25	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	09/22/04 10:01

General Chemistry Parameters by EPA / Standard Methods - Quality Control

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EI41707 - % Solids										
Blank (EI41707-BLK1)				Prepared & Analyzed: 09/16/04						
% Solids	100		%							
Duplicate (EI41707-DUP1)		**Source: 4I15011-01**		Prepared & Analyzed: 09/16/04						
% Solids	100		%		100			0.00	20	
Batch EI42112 - Water Extraction										
Blank (EI42112-BLK1)				Prepared: 09/16/04 Analyzed: 09/21/04						
Chloride	ND	20.0	mg/kg Wet							
Matrix Spike (EI42112-MS1)		**Source: 4I16001-01**		Prepared: 09/16/04 Analyzed: 09/21/04						
Chloride	1300	20.0	mg/kg Wet	500	830	94.0	80-120			
Matrix Spike Dup (EI42112-MSD1)		**Source: 4I16001-01**		Prepared: 09/16/04 Analyzed: 09/21/04						
Chloride	1300	20.0	mg/kg Wet	500	830	94.0	80-120	0.00	20	
Reference (EI42112-SRM1)				Prepared & Analyzed: 09/21/04						
Chloride	4940		mg/kg	5000		98.8	80-120			

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Rice Operating Co.	Project: EME Jct. E-25	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	09/22/04 10:01

Notes and Definitions

DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
RPD	Relative Percent Difference
LCS	Laboratory Control Spike
MS	Matrix Spike
Dup	Duplicate

Report Approved By: Raland K Tuttle Date: 9/22/04

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer
Jeanne Mc Murrey, Inorg. Tech Director
James L. Hawkins, Chemist/Geologist
Sandra Biezugbe, Lab Tech.

COPY

RICE OPERATING COMPANY

122 WEST TAYLOR
HOBBS, NEW MEXICO 88240
PHONE: (505) 393-9174 FAX: (505) 397-1471

VOC FIELD TEST REPORT FORM

MINI RAE PLUS CLASSIC PHOTOIONIZATION GAS DETECTOR

MODEL NO: PGM 761S
CALIBRATION GAS
GAS COMPOSITION: ISOBUTYLENE
AIR
LOT NO: 03-2475
EXP. DATE: 10-19-04
METER READING
ACCURACY: 100.0

SERIAL NO: ~~104412~~ 104550
100 PPM
BALANCE
FILL DATE: 4-19-04
ACCURACY: ± 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
EME	E-25	E	25	19	36

SAMPLE	PID RESULT	SAMPLE	PID RESULT
Source 4'	1.7		
6'	1.5		
8'	0		
10'	0		
12'	0		

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

R. L. Elam
Signature

Title

9-16-04
Date

Current Photodocumentation

RICE *Operating Company* (ROC)
419 West Cain Hobbs, NM 88240
Phone: (575) 393-2967 Fax: (575) 393-0293

EME Jct. E-25 (1R427-192)

UL/E, Section 25, T19S, R36E

Facing west 7/22/2013

Facing north 7/22/2013