

**Lowe, Leonard, EMNRD**

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**From:** Lowe, Leonard, EMNRD  
**Sent:** Friday, January 24, 2014 11:11 AM  
**To:** Hack Conder (hconder@riceswd.com)  
**Cc:** Leking, Geoffrey R, EMNRD; Katie Jones <kjones@riceswd.com> (kjones@riceswd.com); lflores@rice-ecs.com; Sarah Edwards (sedwards@rice-ecs.com); Scott Curtis (scurtis@riceswd.com)  
**Subject:** (1R427-144) Termination Request - EME Jct. Q-6-2

**RE: Termination Request  
for the Rice Operating Company's  
EME Jct. Q-6-2 Site  
Unit Letter Q, Section 6, T21S, R36E, NMPM, Lea County, New Mexico  
(1R427-144) Termination**

Dear Mr. Conder:

The New Mexico Oil Conservation Division (OCD) has received Rice Operating Company's request to close the above-referenced site, dated October 15, 2013. The report is acceptable to the OCD.

The above-referenced report, submitted in accordance with 19.15.29 NMAC (Part 29), 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 (1R427-144) 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 505-476-3492.

**Leonard Lowe**  
Environmental Engineer  
[Environmental Bureau]  
**Oil Conservation Division/Energy Minerals and Natural Resources Department**  
1220 South St. Frances  
Santa Fe, New Mexico 87004  
Office: 505-476-3492  
E-mail: [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us)

# RICE *Operating Company*

122 West Taylor • Hobbs, New Mexico 88240  
Phone: (575) 393-9174 • Fax: (575) 397-1471

RECEIVED OCD

OCT 24 P 1:55

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. Q-6-2 (1R427-144): UL/Q, 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 2004, ROC initiated work on the former EME Q-6-2 junction box. The site is located in UL Q, Sec. 6, T21S, R36E. An updated survey of NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 41 +/- feet. The site was delineated using a backhoe to form a 14x22x4 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 chloride concentrations. The 4 ft sample was sent to a commercial laboratory for analysis, resulting in a chloride concentration of 16 mg/kg and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The sample was also analyzed for BTEX, resulting in concentrations below detectable limits throughout. The excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area. On 8/5/2004, the site was seeded with a blend of native vegetation. 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, 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)393-9174 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 cursive script, appearing to read "L. Flores".

Laura Flores  
Environmental Project Assistant Manager

enclosures

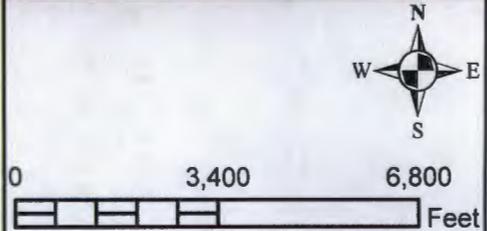
# Site Maps

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

# Site Map



**EME Jct. Q-6-2**  
**1R427-144**  
UL/ Q  
Section 6  
T21S-R36E  
LEA COUNTY, NM



Drawing date: 10/3/2013 JS

# Area Map

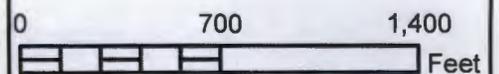
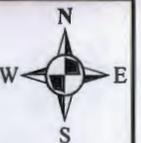


Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

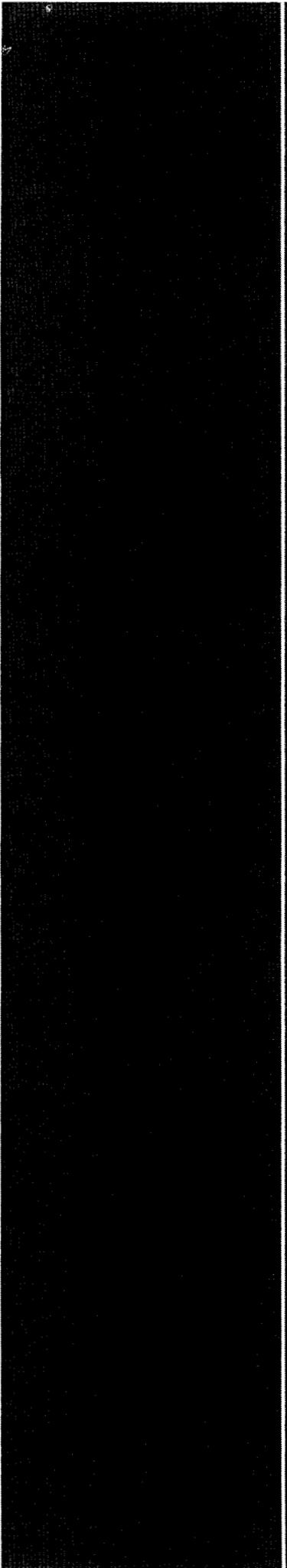


## EME Jct. Q-6-2

1R427-144  
UL/ Q  
Section 6-T21S-R36E



Drawing date: 10/3/2013 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	Q-6-2	Q	6	21S	36E	Lea	no box--eliminated		

LAND TYPE: BLM \_\_\_\_\_ STATE X FEE LANDOWNER \_\_\_\_\_ OTHER \_\_\_\_\_

Depth to Groundwater >100 or None feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 5/14/2004 Date Completed 6/7/2004 OCD Witness No

Soil Excavated 46 cubic yards Excavation Length 14 Width 22 Depth 4 feet

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

**FINAL ANALYTICAL RESULTS:** Sample Date 5/14/2004 Sample Depth 4 ft

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	Chloride mg/kg
Bottom Grab @ 4 ft	<0.005	<0.005	<0.005	<0.005	<10.0	<10.0	16

General Description of Remedial Action: The lumber from this box was removed during the NORM survey and the junction was removed as the new pipeline was plumbed straight through at this location. Upon environmental observation, there was no physical evidence of TPH or chloride impact. Samples were collected using a hand auger and field tested for chloride. All tests indicated low concentrations. Lab results yielded NMOCD TPH and BTEX guidelines were met and very low chloride was confirmed. The hole where the box had been was backfilled with 60 yds of clean, imported soils. On 8/5/2004, the disturbed surface was seeded with a blend of native vegetation.

enclosures: photos, lab results

**CHLORIDE FIELD TESTS**

LOCATION	DEPTH (ft)	ppm
background	0	67
4-wall comp.	0-4	122
vertical at jct.	1	134
	2	142
	3	91
	4	78

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

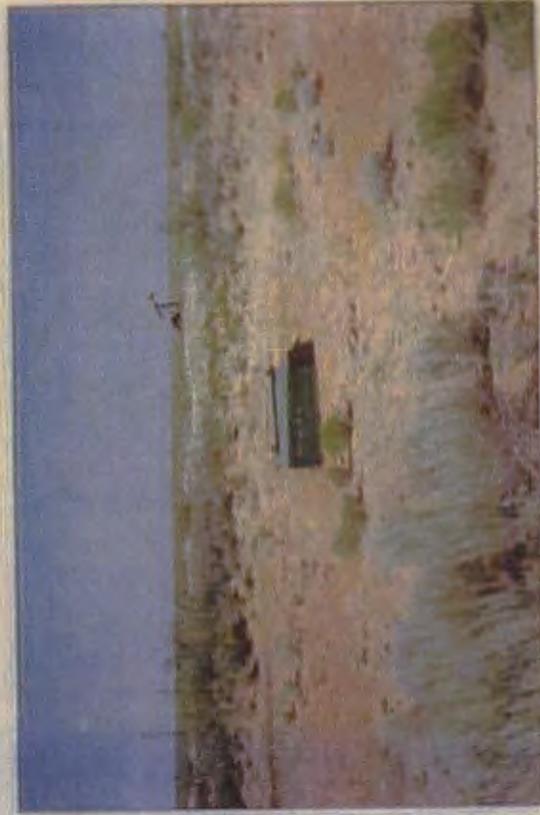
SITE SUPERVISOR Roy Rascon SIGNATURE Roy R. Rascon COMPANY RICE Operating Company

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE Kristin Farris Pope

DATE 8/9/2004 TITLE Project Scientist

# EME jct. Q-6-2

unit 'Q', sec. 6, T21S, R36E



undisturbed junction box

7/22/2003



junction box removed

5/5/2004



seeding backfilled site

8/5/2004



PHONE (325) 873-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2329 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR  
 RICE OPERATING CO.  
 ATTN: KRISTIN FARRIS  
 122 W. TAYLOR  
 HOBBS, NM 88240  
 FAX TO: (505) 397-1471

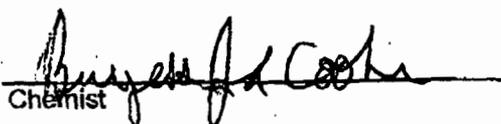
Receiving Date: 05/14/04  
 Reporting Date: 05/19/04  
 Project Number: NOT GIVEN  
 Project Name: Q-6-2  
 Project Location: Q-6-2

Sampling Date: 05/14/04  
 Sample Type: SOIL  
 Sample Condition: COOL & INTACT  
 Sample Received By: GP  
 Analyzed By: BC/HM

LAB NUMBER	SAMPLE ID	GRO (C <sub>6</sub> -C <sub>10</sub> ) (mg/Kg)	DRO (>C <sub>10</sub> -C <sub>28</sub> ) (mg/Kg)	Cl* (mg/Kg)
ANALYSIS DATE		05/14/04	05/14/04	05/17/04
H8703-1	4' @ SOURCE	<10.0	<10.0	16
Quality Control		826	753	1030
True Value QC		800	800	1000
% Recovery		103	94.1	103
Relative Percent Difference		2.5	2.8	2.0

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

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

  
 Chemist

5/19/04  
 Date

H8703.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 (325) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2328 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR  
 RICE OPERATING CO.  
 ATTN: KRISTIN FARRIS  
 122 W. TAYLOR  
 HOBBS, NM 88240  
 FAX TO: (505) 397-1471

Receiving Date: 05/14/04  
 Reporting Date: 5/19/04  
 Project Number: NOT GIVEN  
 Project Name: Q-6-2  
 Project Location: Q-6-2

Sampling Date: 05/14/04  
 Sample Type: SOIL  
 Sample Condition: COOL & INTACT  
 Sample Received By: GP  
 Analyzed By: BC

LAB NUMBER	SAMPLE ID	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE		05/19/04	05/19/04	05/19/04	05/19/04
H8703-1	4' @ SOURCE	<0.005	<0.005	<0.005	<0.005
Quality Control		0.095	0.095	0.091	0.279
True Value QC		0.100	0.100	0.100	0.300
% Recovery		94.7	95.4	91.3	93.1
Relative Percent Difference		0.5	1.6	1.6	3.8

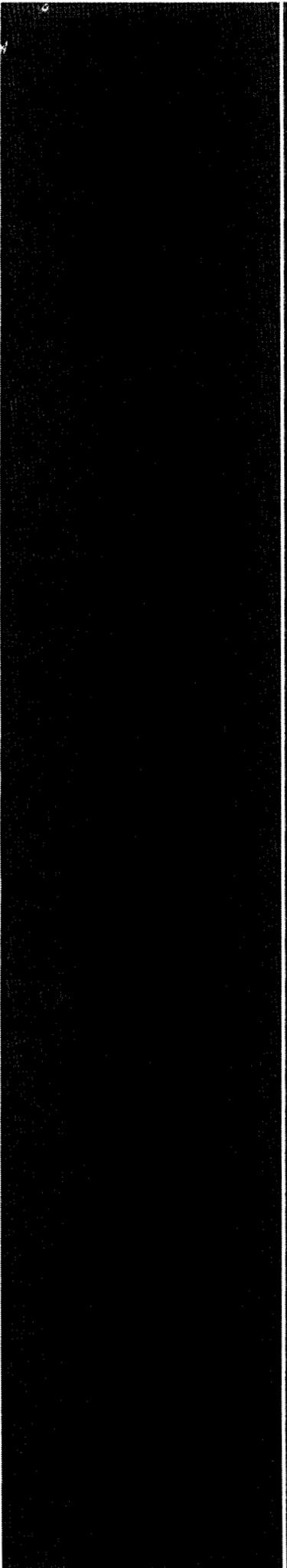
METHOD: EPA SW-846 8260

*Burgess A. Cooke*  
 Chemist

*5/19/04*  
 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.





# Current Photodocumentation

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

# EME Jct. Q-6-2 (1R427-144)

UL/Q, Section 6, T21S, R36E



Facing North

5/10/2013



Facing South

5/10/2013