

1R - 427-23

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, January 17, 2013 5:44 PM
To: Hack Conder (hconder@riceswd.com)
Cc: Leking, Geoffrey R, EMNRD; Laura Pena (lpna@riceswd.com); Katie Jones <kjones@riceswd.com> (kjones@riceswd.com); Scott Curtis (scurtis@riceswd.com)
Subject: Remediation Plan (1R427-23) Termination - ROC EME K-32 Site

**RE: Termination Request
for the Rice Operating Company's
EME K-32 Site
Unit Letter K, Section 32, T19S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-23) 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 January 11, 2013 (received January 15, 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 (1R427-23) 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 8746

January 11, 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

JAN 15 2013

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

RE: Termination Request
EME K-32 (1R427-23): UL/K Sec. 32, 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 2003, ROC initiated work on the former K-32 junction box. The site is located in UL/K, Sec. 32, T19S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 10 +/- feet. After the former junction box was removed, representative samples were collected from the bottom and sidewalls. Field testing of the samples resulted in low concentrations of chloride. The representative samples were sent to a commercial laboratory for analysis of chloride and TPH, resulting in a sidewall chloride concentration below detectable limits, a gasoline range organics (GRO) concentration below detectable limits and a diesel range organics (DRO) concentration of 42.9 mg/kg. The bottom composite resulted in chloride concentration below detectable limits, a GRO concentration below detectable limits and a DRO concentration of 67.1 mg/kg. The samples were also analyzed for BTEX, which resulted in concentrations below detectable limits. The excavation was backfilled to ground surface and confoured to the surrounding area.

The junction box site location map, final report, laboratory analysis, and current photo documentation 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.

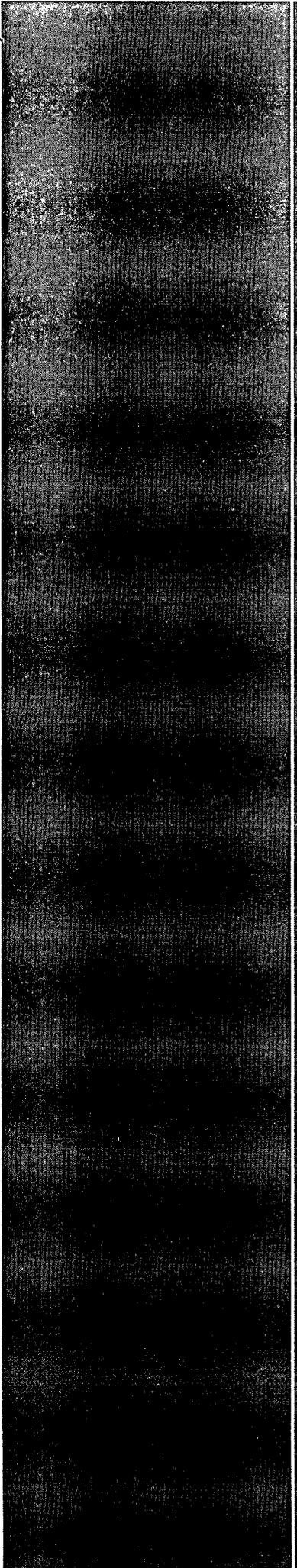
Please contact me at (575)393-9174 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,
RICE Operating Company

A handwritten signature in black ink, appearing to read "H. Conder", with a long horizontal flourish extending to the right.

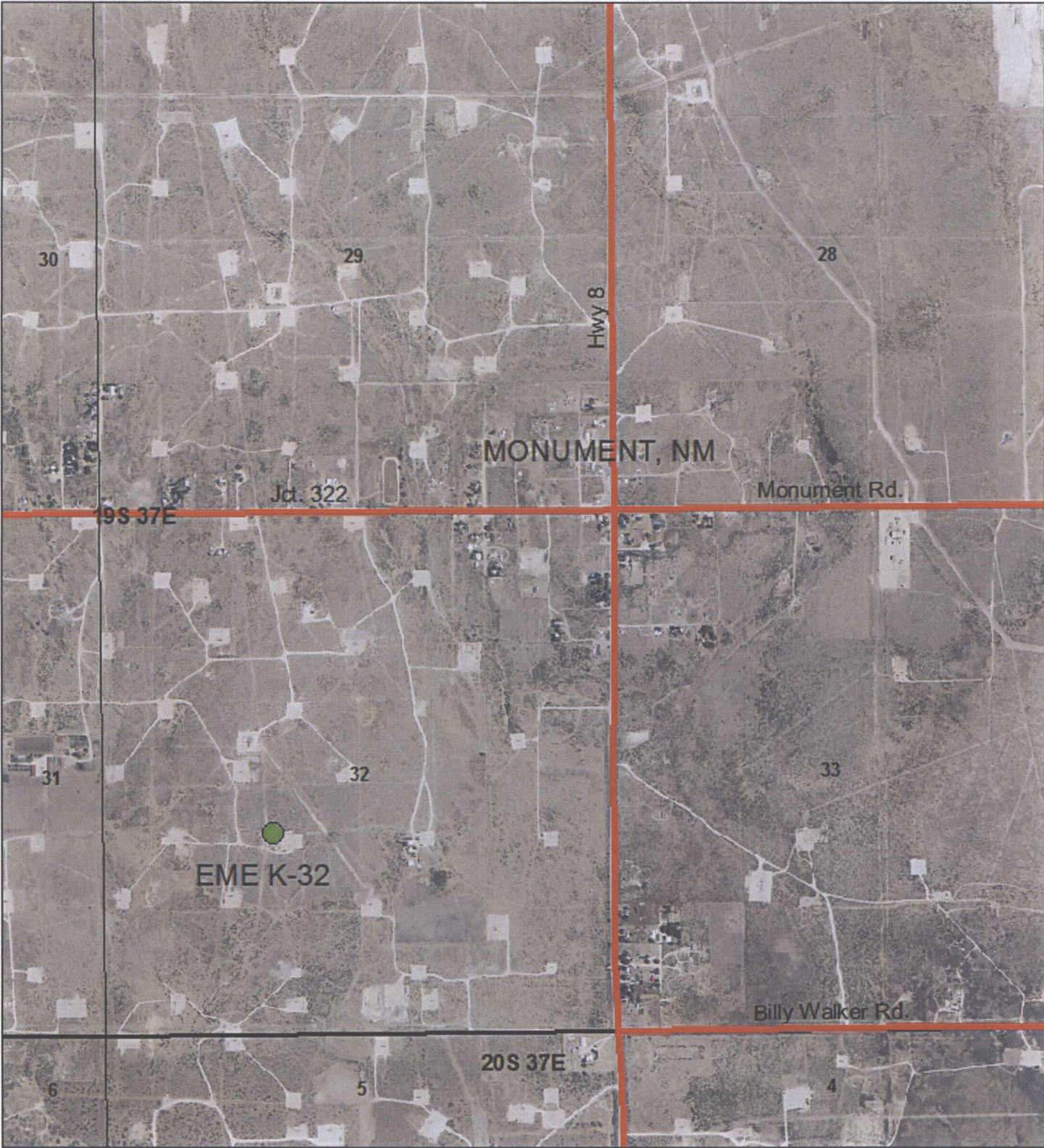
Hack Conder
Environmental Manager

enclosures



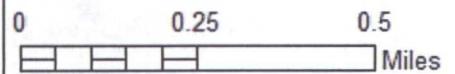
Site Location Map

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

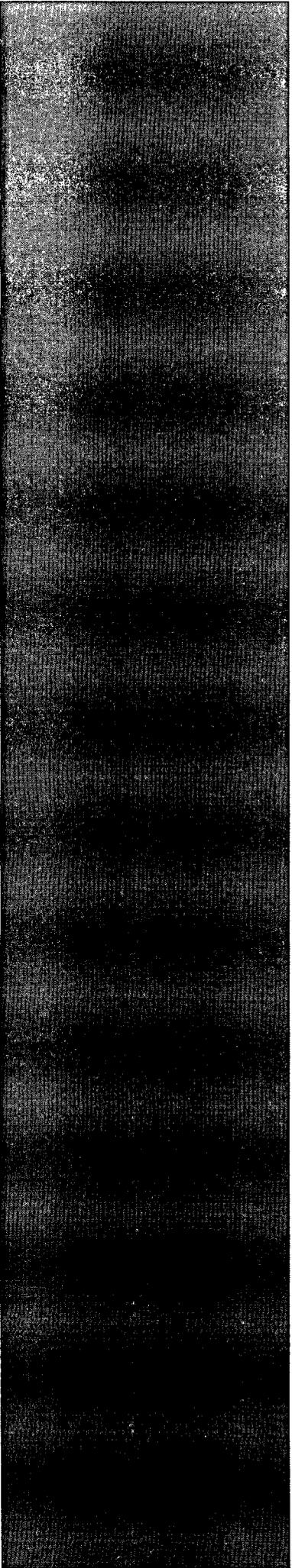


EME K-32

UL K SECTION 32
T-19-S R-37-E
LEA COUNTY, NM



Drawing date: 12/7/12
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

JUNCTION BOX FINAL REPORT

BOX LOCATION

| SWD SYSTEM | JUNCTION | UNIT | SECTION | TOWNSHIP | RANGE | COUNTY | BOX DIMENSIONS - FEET | | |
|------------|----------|------|---------|----------|-------|--------|-----------------------|-------|-------|
| | | | | | | | Length | Width | Depth |
| EME | K-32 | K | 32 | 19S | 37E | Lea | 6' | 5' | 2' |

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

Depth to Groundwater 10' feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 01/20/2003 Date Completed 01/20/2003 OCD Witness No

Soil Excavated 0 cubic yards Excavation Length 6' Width 5' Depth 2' feet

Soil Disposed 0 cubic yards Offsite Facility N/A Location N/A

FINAL ANALYTICAL RESULTS: Sample Date January 20, 2003 Sample Depth 2' bgs

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 ma/ka | Toluene ma/ka | Ethyl Benzene ma/ka | Total Xylenes ma/ka | GRO ma/ka | DRO ma/ka | Chlorides PPM |
|-----------------|---------------|---------------|---------------------|---------------------|-----------|-----------|---------------|
| SIDEWALLS | <0.025 | <0.025 | <0.025 | <0.025 | <10.0 | 42.9 | <20.0 |
| BOTTOM | <0.025 | <0.025 | <0.025 | <0.025 | <10.0 | 67.1 | <20.0 |

General Description of Remedial Action: The walls and bottom were delineated laterally and vertically to below the NMOCD TPH guidelines. The junction box was backfilled and contoured to the surrounding area. A new junction box was installed 60' East of the above referenced junction box.

CHLORIDE FIELD TESTS

| LOCATION | DEPTH | Chlorides |
|----------|----------|-----------|
| W Comp | 1.5' bgs | 63 ppm |
| B Comp | 2' bgs | 84 ppm |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

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

DATE March 4, 2003 PRINTED NAME Chris Rodriguez

SIGNATURE *Chris Rodriguez* TITLE Environmental Technician

ANALYTICAL REPORT

Prepared for:

CHRIS RODRIGUEZ
RICE OPERATING CORP.
122 WEST TAYLOR
HOBBS, NM 88240

Project: Texaco Amerada "H" EOL
PO#: EME
Order#: G0305573
Report Date: 01/31/2003

Certificates

US EPA Laboratory Code TX00158

ENVIRONMENTAL LAB OF TEXAS

SAMPLE WORK LIST

RICE OPERATING CORP.
122 WEST TAYLOR

Order#: G0305573
Project: Texaco
Amerada "H"
EOL

HOBBS, NM 88240
505-397-1471

Project Name: Texaco Amerada "H" EOL
Location: EME

The samples listed below were submitted to Environmental Lab of Texas and were received under chain of custody. Environmental Lab of Texas makes no representation or certification as to the method of sample collection, sample identification, or transportation/handling procedures used prior to the receipt of samples by Environmental Lab of Texas, unless otherwise noted.

| | | | | | | |
|-------------------|------------------------|--------------|------------------|------------------|------------|-----|
| 0305573-01 | Wall Composite 1.5'bgs | SOIL | 1/20/03 11:00 | 1/28/03 17:10 | 4 oz glass | Ice |
| | <u>Lab Testing:</u> | Rejected: No | | Temp: 0.0C | | |

8015M
8021B/5030 BTEX
Chloride

| | | | | | | |
|-------------------|---------------------|--------------|------------------|------------------|------------|-----|
| 0305573-02 | Bottom Comp. 3'bgs | SOIL | 1/20/03 11:05 | 1/28/03 17:10 | 4 oz glass | Ice |
| | <u>Lab Testing:</u> | Rejected: No | | Temp: 0.0C | | |

8015M
8021B/5030 BTEX
Chloride

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

CHRIS RODRIGUEZ
 RICE OPERATING CORP.
 122 WEST TAYLOR
 HOBBS, NM 88240

Order#: G0305573
 Project: Texaco Amerada "H" EOL
 Project Name: Texaco Amerada "H" EOL
 Location: EME

Lab ID: 0305573-01
 Sample ID: Wall Composite 1.5'bgs

8015M

| <u>Method</u> | <u>Date</u> | <u>Date</u> | <u>Sample</u> | <u>Dilution</u> | <u>Analyst</u> | <u>Method</u> |
|---------------|-------------|-------------|---------------|-----------------|----------------|---------------|
| Blank | Prepared | Analyzed | Amount | Factor | | |
| | | 1/29/03 | 1 | 1 | CK | 8015M |

| Parameter | Result mg/kg | RL |
|---------------|-----------------|------|
| GRO, C6-C12 | <10.0 | 10.0 |
| DRO, >C12-C35 | 42.9 | 10.0 |
| TOTAL, C6-C35 | 42.9 | 10.0 |

| Surrogates | % Recovered | QC Limits (%) | |
|--------------------|-------------|---------------|-----|
| 1-Chlorooctane | 97% | 70 | 130 |
| 1-Chlorooctadecane | 101% | 70 | 130 |

8021B/5030 BTEX

| <u>Method</u> | <u>Date</u> | <u>Date</u> | <u>Sample</u> | <u>Dilution</u> | <u>Analyst</u> | <u>Method</u> |
|---------------|-------------|------------------|---------------|-----------------|----------------|---------------|
| Blank | Prepared | Analyzed | Amount | Factor | | |
| 0004493-02 | | 1/30/03 16:35 | 1 | 25 | CK | 8021B |

| Parameter | Result mg/kg | RL |
|--------------|-----------------|-------|
| Benzene | <0.025 | 0.025 |
| Toluene | <0.025 | 0.025 |
| Ethylbenzene | <0.025 | 0.025 |
| p/m-Xylene | <0.025 | 0.025 |
| o-Xylene | <0.025 | 0.025 |

| Surrogates | % Recovered | QC Limits (%) | |
|--------------------|-------------|---------------|-----|
| aaa-Toluene | 92% | 80 | 120 |
| Bromofluorobenzene | 93% | 80 | 120 |

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

CHRIS RODRIGUEZ
 RICE OPERATING CORP.
 122 WEST TAYLOR
 HOBBS, NM 88240

Order#: G0305573
 Project: Texaco Amerada "H" EOL
 Project Name: Texaco Amerada "H" EOL
 Location: EME

Lab ID: 0305573-02
 Sample ID: Bottom Comp. 3'bgs

8015M

| <u>Method</u> | <u>Date</u> | <u>Date</u> | <u>Sample</u> | <u>Dilution</u> | <u>Analyst</u> | <u>Method</u> |
|---------------|-----------------|-----------------|---------------|-----------------|----------------|---------------|
| <u>Blank</u> | <u>Prepared</u> | <u>Analyzed</u> | <u>Amount</u> | <u>Factor</u> | <u>Factor</u> | <u>Method</u> |
| | | 1/29/03 | 1 | 1 | CK | 8015M |

| Parameter | Result mg/kg | RL |
|---------------|--------------|------|
| GRO, C6-C12 | <10.0 | 10.0 |
| DRO, >C12-C35 | 67.1 | 10.0 |
| TOTAL, C6-C35 | 67.1 | 10.0 |

| Surrogates | % Recovered | QC Limits (%) | |
|--------------------|-------------|---------------|-----|
| 1-Chlorooctane | 106% | 70 | 130 |
| 1-Chlorooctadecane | 118% | 70 | 130 |

8021B/5030 BTEX

| <u>Method</u> | <u>Date</u> | <u>Date</u> | <u>Sample</u> | <u>Dilution</u> | <u>Analyst</u> | <u>Method</u> |
|---------------|-----------------|------------------|---------------|-----------------|----------------|---------------|
| <u>Blank</u> | <u>Prepared</u> | <u>Analyzed</u> | <u>Amount</u> | <u>Factor</u> | <u>Factor</u> | <u>Method</u> |
| 0004493-02 | | 1/30/03 16:58 | 1 | 25 | CK | 8021B |

| Parameter | Result mg/kg | RL |
|--------------|--------------|-------|
| Benzene | <0.025 | 0.025 |
| Toluene | <0.025 | 0.025 |
| Ethylbenzene | <0.025 | 0.025 |
| p/m-Xylene | <0.025 | 0.025 |
| o-Xylene | <0.025 | 0.025 |

| Surrogates | % Recovered | QC Limits (%) | |
|--------------------|-------------|---------------|-----|
| aaa-Toluene | 98% | 80 | 120 |
| Bromofluorobenzene | 92% | 80 | 120 |

Approval: Raland K. Tuttle 1-31-03
 Raland K. Tuttle, Lab Director, QA Officer Date
 Celey D. Keene, Org. Tech. Director
 Jeanne McMurrey, Inorg. Tech. Director
 Sandra Biezugbe, Lab Tech.
 Sara Molina, Lab Tech.

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

CHRIS RODRIGUEZ
RICE OPERATING CORP.
122 WEST TAYLOR
HOBBS, NM 88240

Order#: G0305573
Project: Texaco Amerada "H" EOL
Project Name: Texaco Amerada "H" EOL
Location: EME

Lab ID: 0305573-01
Sample ID: Wall Composite 1.5'bgs

Test Parameters

| <u>Parameter</u> | <u>Result</u> | <u>Units</u> | <u>Dilution Factor</u> | <u>RL</u> | <u>Method</u> | <u>Date Analyzed</u> | <u>Analyst</u> |
|------------------|---------------|--------------|------------------------|-----------|---------------|----------------------|----------------|
| Chloride | <20.0 | mg/kg | 1 | 20 | 9253 | 1/29/03 | SB |

Lab ID: 0305573-02
Sample ID: Bottom Comp. 3'bgs

Test Parameters

| <u>Parameter</u> | <u>Result</u> | <u>Units</u> | <u>Dilution Factor</u> | <u>RL</u> | <u>Method</u> | <u>Date Analyzed</u> | <u>Analyst</u> |
|------------------|---------------|--------------|------------------------|-----------|---------------|----------------------|----------------|
| Chloride | <20.0 | mg/kg | 1 | 20 | 9253 | 1/29/03 | SB |

Approval: Ral K Tuttle 1-31-03
Raland K. Tuttle, Lab Director, QA Officer Date
Coley D. Keene, Org. Tech. Director
Jeanne McMurrey, Inorg. Tech. Director
Sandra Biezugbe, Lab Tech.
Sara Molina, Lab Tech.

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

8015M

Order#: G0305573

| <i>BLANK</i> | SOIL | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
|---------------------|------|------------|------------------|-----------------|----------------|------------------|------|
| TOTAL, C6-C35-mg/kg | | 0004482-02 | | | <10.0 | | |
| <i>MS</i> | SOIL | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
| TOTAL, C6-C35-mg/kg | | 0305572-01 | 0 | 952 | 701 | 73.6% | |
| <i>MSD</i> | SOIL | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
| TOTAL, C6-C35-mg/kg | | 0305572-01 | 701 | 952 | 771 | 81.0% | 9.5% |
| <i>SRM</i> | SOIL | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
| TOTAL, C6-C35-mg/kg | | 0004482-05 | | 1000 | 753 | 75.3% | |

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

8021B/5030 BTEX

Order#: G0305573

| BLANK | SOIL | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
|--------------------|------|------------|------------------|-----------------|----------------|------------------|------|
| Benzene-mg/kg | | 0004493-02 | | | <0.025 | | |
| Toluene-mg/kg | | 0004493-02 | | | <0.025 | | |
| Ethylbenzene-mg/kg | | 0004493-02 | | | <0.025 | | |
| p/m-Xylene-mg/kg | | 0004493-02 | | | <0.025 | | |
| o-Xylene-mg/kg | | 0004493-02 | | | <0.025 | | |
| CONTROL | SOIL | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
| Benzene-mg/kg | | 0004493-03 | | 0.1 | 0.107 | 107.0% | |
| Toluene-mg/kg | | 0004493-03 | | 0.1 | 0.109 | 109.0% | |
| Ethylbenzene-mg/kg | | 0004493-03 | | 0.1 | 0.105 | 105.0% | |
| p/m-Xylene-mg/kg | | 0004493-03 | | 0.2 | 0.235 | 117.5% | |
| o-Xylene-mg/kg | | 0004493-03 | | 0.1 | 0.106 | 106.0% | |
| CONTROL DUP | SOIL | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
| Benzene-mg/kg | | 0004493-04 | | 0.1 | 0.101 | 101.0% | 5.8% |
| Toluene-mg/kg | | 0004493-04 | | 0.1 | 0.105 | 105.0% | 3.7% |
| Ethylbenzene-mg/kg | | 0004493-04 | | 0.1 | 0.102 | 102.0% | 2.9% |
| p/m-Xylene-mg/kg | | 0004493-04 | | 0.2 | 0.231 | 115.5% | 1.7% |
| o-Xylene-mg/kg | | 0004493-04 | | 0.1 | 0.103 | 103.0% | 2.9% |
| SRM | SOIL | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
| Benzene-mg/kg | | 0004493-05 | | 0.1 | 0.094 | 94.0% | |
| Toluene-mg/kg | | 0004493-05 | | 0.1 | 0.094 | 94.0% | |
| Ethylbenzene-mg/kg | | 0004493-05 | | 0.1 | 0.086 | 86.0% | |
| p/m-Xylene-mg/kg | | 0004493-05 | | 0.2 | 0.193 | 96.5% | |
| o-Xylene-mg/kg | | 0004493-05 | | 0.1 | 0.087 | 87.0% | |

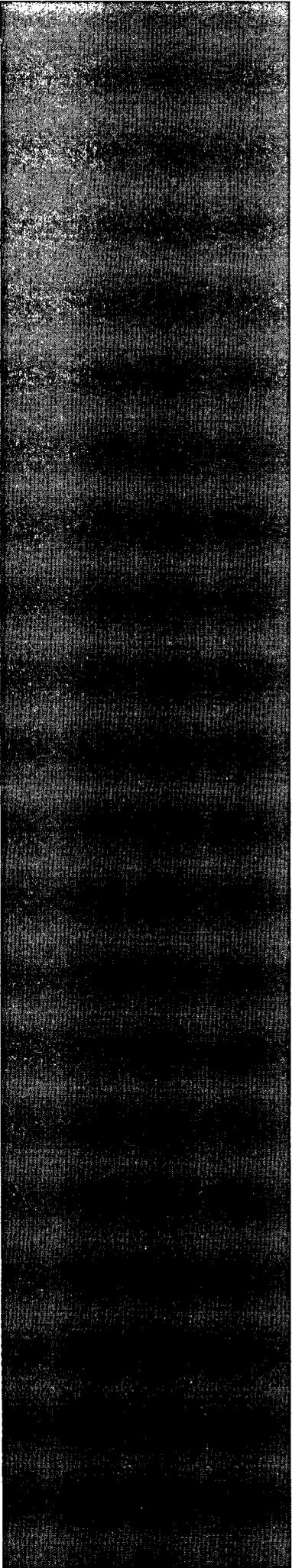
ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

Test Parameters

Order#: G0305573

| BLANK | SOIL | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
|----------------|------|------------|------------------|-----------------|----------------|------------------|------|
| Chloride-mg/kg | | 0004469-01 | | | <20.0 | | |
| MS | SOIL | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
| Chloride-mg/kg | | 0305568-01 | 0 | 1000 | 1010 | 101.0% | |
| MSD | SOIL | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
| Chloride-mg/kg | | 0305568-01 | 0 | 1000 | 1030 | 103.0% | 2.0% |
| SRM | SOIL | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
| Chloride-mg/kg | | 0004469-04 | | 5000 | 5090 | 101.8% | |



Current Photodocumentation

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

EME K-32 (1R427-23)
Unit Letter K, Section 32, T19S, R37E



Facing West

12/17/2012



Facing East

12/17/2012