

1R - 427-29

APPROVALS

YEAR(S):

2013

RICE *Operating Company*

112 West Taylor • Hobbs, New Mexico 88240

Phone: (575) 393-9174 • Fax: (575) 397-1471

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8753

January 18, 2013

RECEIVED

Mr. Edward Hansen
New Mexico Energy, Minerals, & Natural Resources
Oil Conservation Division, Environmental Bureau
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

JAN 23 2013

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

RE: Termination Request
EME P-34 (1R427-29): UL/P Sec. 34, T19S, R36E
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 P-34 junction box. The site is located in UL/P, Sec. 34, T19S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 47 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 25x16x12 ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons resulting in chloride concentrations that did relent with depth and low concentrations of TPH. The excavated soil was blended on site and representative composite samples of the excavation bottom, the excavation walls, and the backfill were sent to a commercial laboratory for analysis of chloride and TPH, resulting in a sidewall chloride concentration of 528 mg/kg and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The bottom composite resulted in a chloride concentration of 800 mg/kg. The backfill resulted in a chloride concentration of 384 mg/kg and concentrations of GRO and DRO below detectable limits. The blended excavated material was returned to the excavation to 6 ft BGS. A 6 ft shelf was excavated and a 1.5 ft thick clay liner was installed with a compaction test performed on 10/3/2003. The remainder of the excavation was backfilled with the

remaining blended material to ground surface and contoured to the surrounding area. On 10/15/2003, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate. A new, water-tight junction box was built 73 ft southwest.

The junction box site location map, final report, photodocumentation, clay density test, 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.

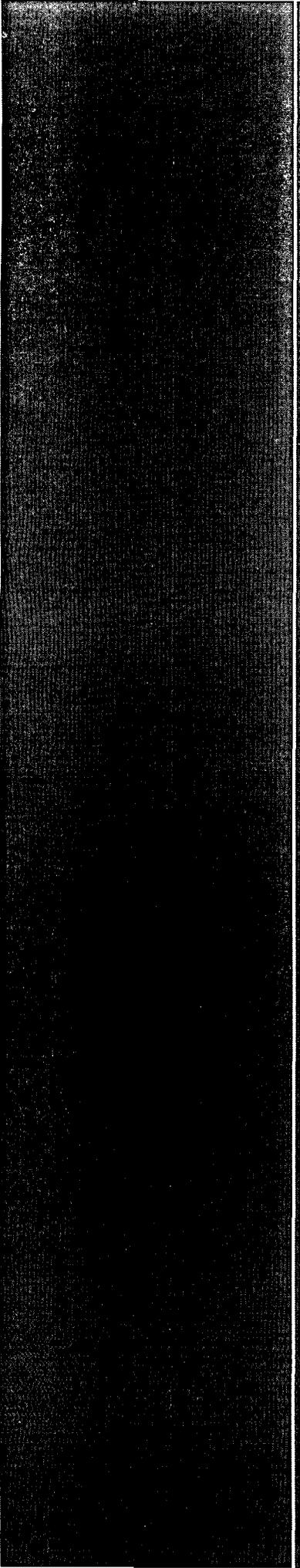
Please contact me at (575)393-9174 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,
RICE Operating Company

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

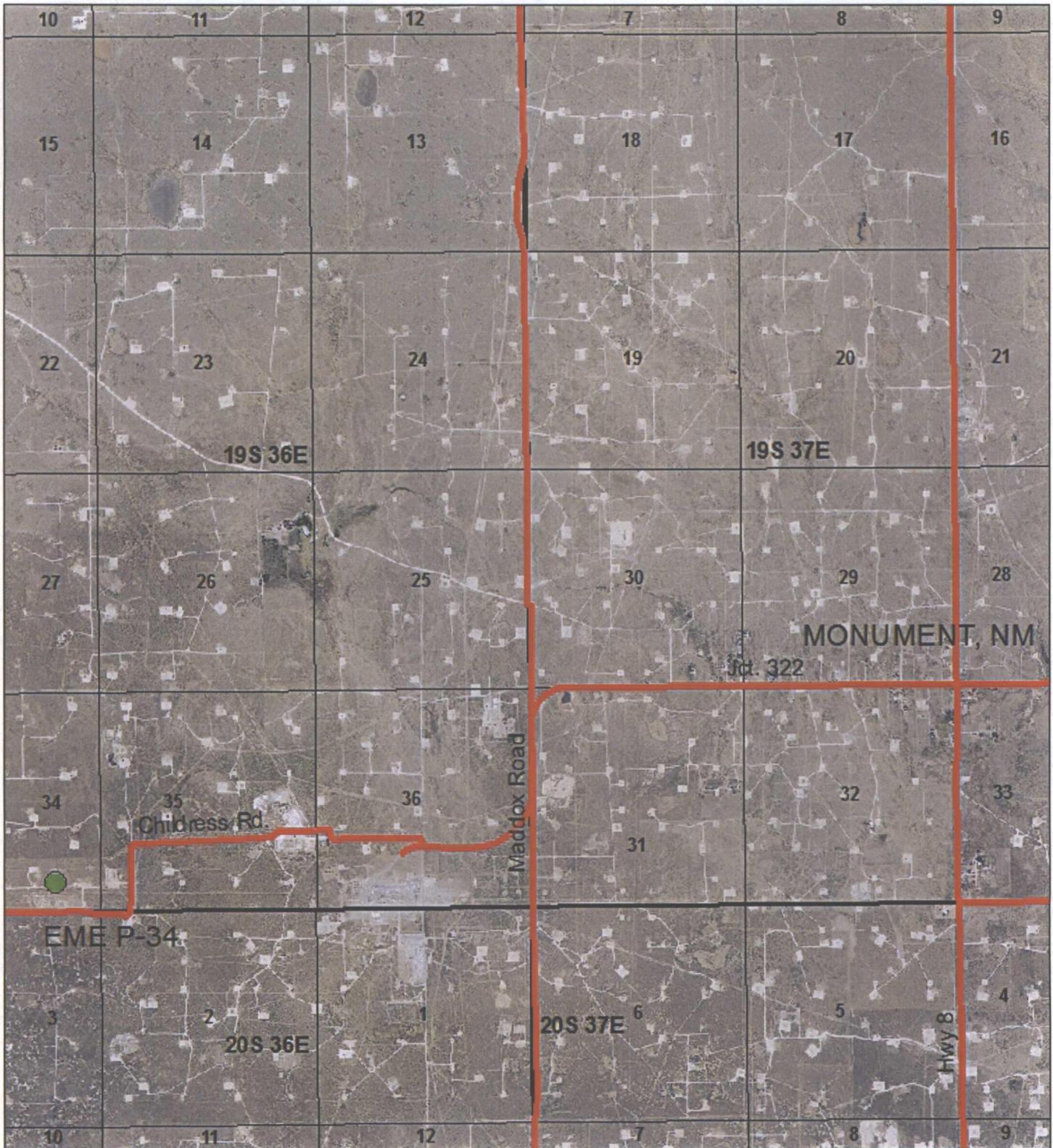
Hack Conder
Environmental Manager

enclosures



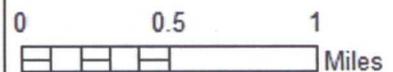
Site Location Map

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

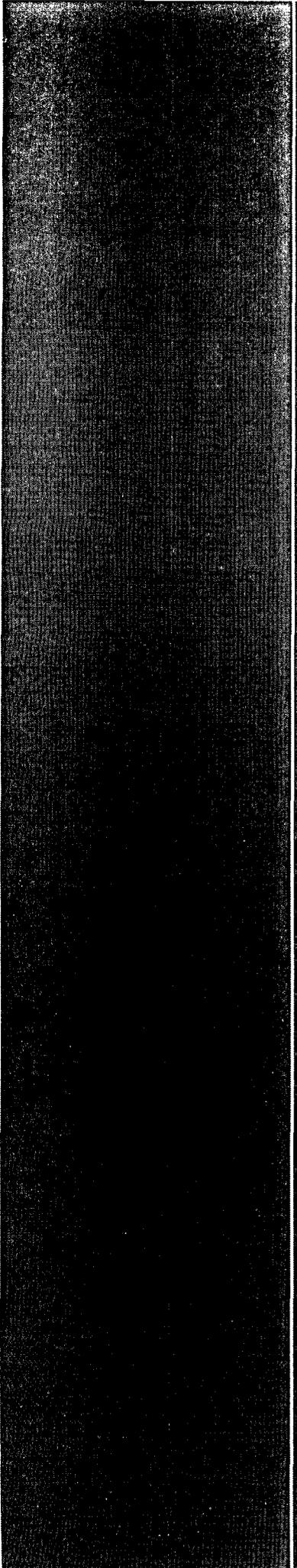


**EME
P-34**

**UL P SECTION 34
T-19-S R-36-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

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
							Length	Width	Depth
EME	P-34	P	34	19S	36E	Lea	Moved 73 ft southwest		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER James A. Foster, Jr. OTHER _____

Depth to Groundwater 47 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 9/10/2003 Date Completed 10/3/2003 OCD Witness No

Soil Excavated 200 cubic yards Excavation Length 25 Width 16 Depth 12 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 9/22/2003 Sample Depth 12 ft 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	PID ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
SIDEWALLS	13.1	<10.0	<10.0	528
BOTTOM	26.7	xxx	xxx	800
BACKFILL	18.1	<10.0	<10.0	384

CHLORIDE FIELD TESTS

LOCATION	DEPTH (ft)	ppm
vertical @ source	6	907
	8	917
	10	690
	12	1165
5 ft North	14	603
	6	1753
	7	1109
	9	890
	10	735
	12	555
	bottom comp.	12
4-wall comp.	n/a	784
backfill	n/a	694

General Description of Remedial Action: This junction box site was delineated with a backhoe while chloride tests and PID readings were conducted at regular intervals. TPH impact was minimal and lab results confirmed concentrations well below NMOCD guidelines. Chloride concentrations exhibited a conclusive decline with depth, however, lateral trends of chloride declination were not determined within the 25 x 16 x 12-ft-deep excavation. The excavation was backfilled with the blended excavated material up to 6 ft bgs. To inhibit further downward migration of chloride impact, a 1.5 ft compacted clay barrier was installed at 6 ft bgs and extended over shelves made to surround the original excavation (see diagram). The remaining blended material was then backfilled on top of the clay up to the surface. The disturbed surface was re-seeded with native vegetation on 10/15/2003 and will be monitored for growth.

enclosures: lab results, chloride graphs, photos, clay density test,

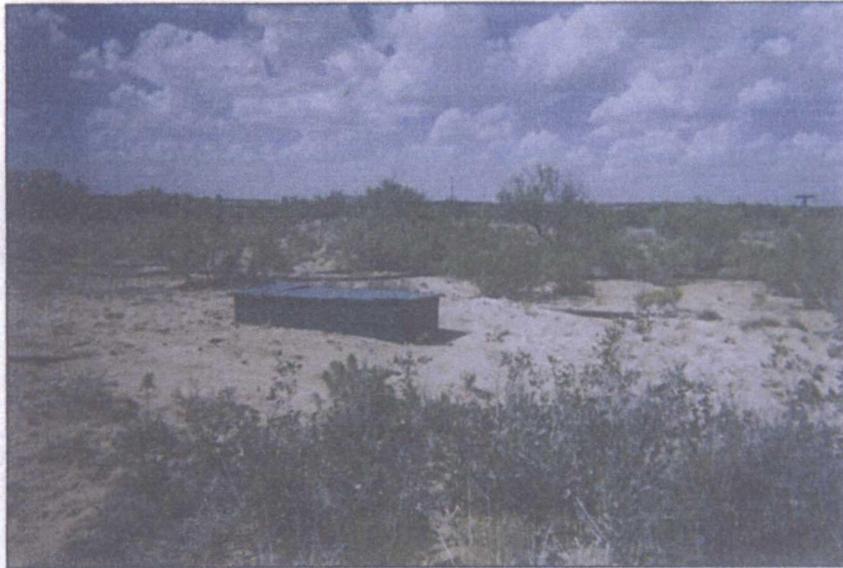
PID readings, cross-section of excavation

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

DATE 11/21/2003 PRINTED NAME Kristin Farris

SIGNATURE *Kristin Farris* TITLE Project Scientist

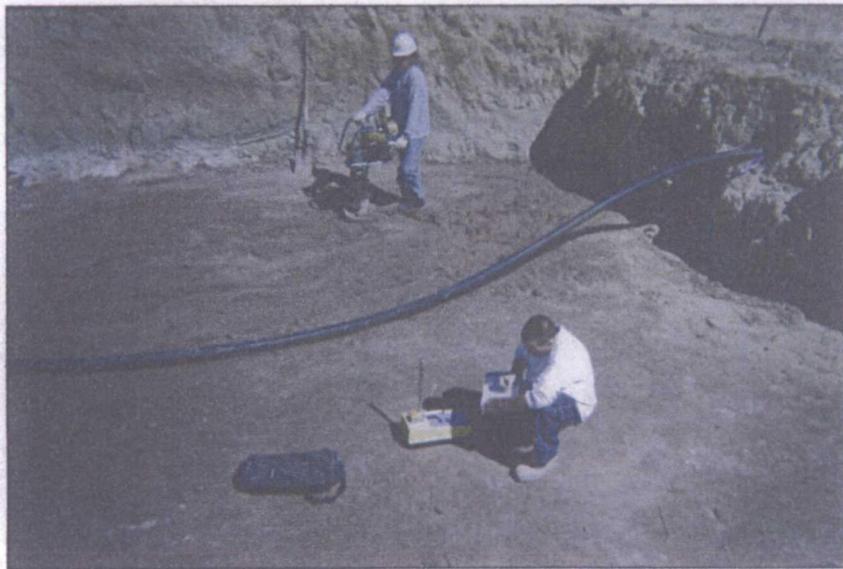
EME jct. P-34



Undisturbed Junction Box Prior to NORM Removal



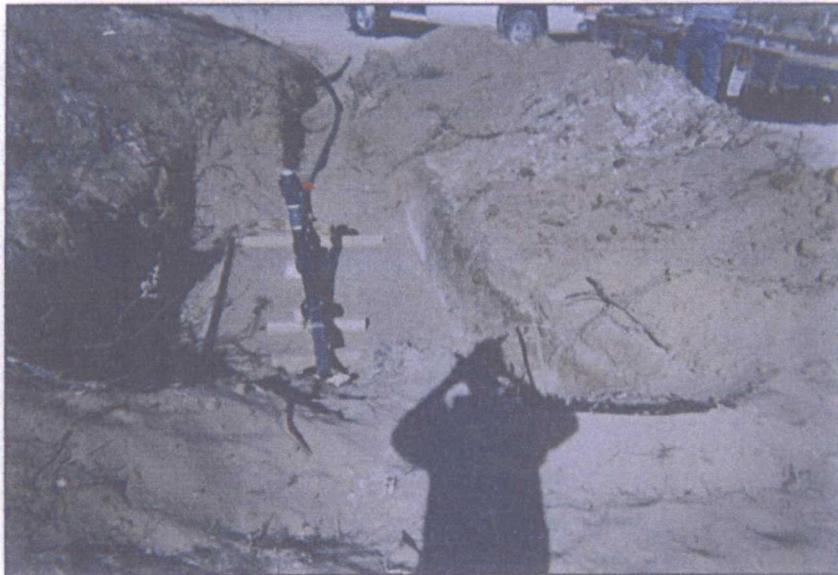
Excavation Sept. 2003



Compacting and Testing Clay Liner at 6 ft BGS 10/2/2003



Backfilled Site with ID Plate Marking Clay Below



Construction of New Junction Box With New Plumbing

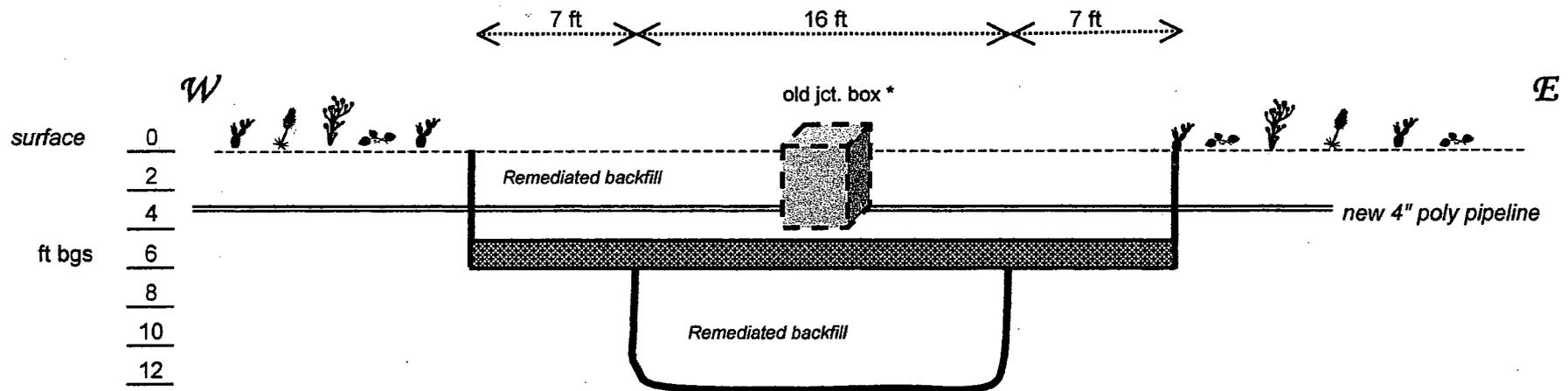
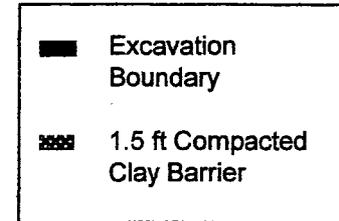


Completed Box 73 ft SW 8/29/2003



Seeding Disturbed Area 10/15/2003

EME jct. P-34
Impact Excavation
Cross-Section



* New junction box has been built 73 ft Southwest from old junction.



**ARDINAL
LABORATORIES**

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

PHONE (505) 393-2326 • 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: 11/19/03
Reporting Date: 11/19/03
Project Number: NOT GIVEN
Project Name: EME P-34
Project Location: LEA COUNTY

Analysis Date: 11/19/03
Sampling Date: 09/16/03
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: AH

LAB NUMBER	SAMPLE ID	Cl ⁻ (mg/Kg)
H8187-1	BOTTOM 12' COMP.	800
Quality Control		1000
True Value QC		1000
% Recovery		100
Relative Percent Difference		2.0

METHOD: Standard Methods 4500-Cl⁻B

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

Amy Hill
Chemist

11/19/03
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.



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

PHONE (505) 393-2326 • 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: 09/26/03
 Reporting Date: 09/27/03
 Project Number: NOT GIVEN
 Project Name: EME P-34
 Project Location: LEA CO., NM

Sampling Date: 09/22/03
 Sample Type: SOIL
 Sample Condition: COOL & INTACT
 Sample Received By: BC
 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		09/26/03	09/26/03	09/26/03
H8039-1	BOTTOM 6' COMPOSITE	<10.0	<10.0	1070
H8039-2	4 WALL COMPOSITE	<10.0	<10.0	528
H8039-3	STOCKPILE 5 POINT	<10.0	<10.0	384
Quality Control		765	803	980
True Value QC		800	800	1000
% Recovery		95.7	100	98.0
Relative Percent Difference		7.4	2.3	2.0

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; Cl: Std. Methods 4500-ClB
 *Analyses performed on 1:4 w:v aqueous extracts.

Burgess A. Cook
 Chemist

9/27/03
 Date

H8039.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.

ETGI

25' x 15' x 12' deep

Junction Box Final report Bottom/4 well/5 stockpile composite
SITE EXCAVATION INFORMATION

EME P-34

DATE DEPTH CL PID TPH SOIL COMPOSITION

Topy RL

DATE	DEPTH	CL	PID	TPH	SOIL COMPOSITION
9-18-03	Bottom 12'	682	26.7	15	mix
	4 well	592	30.0	22	}
	stockpile	772	29.5	23	
	N. Well 7'	426	26.5	34	
	S. Well 18'	777	26.7	18	
	W. Well 8'	527	21.5	14	
	E. Well 8'	628	23.4	30	

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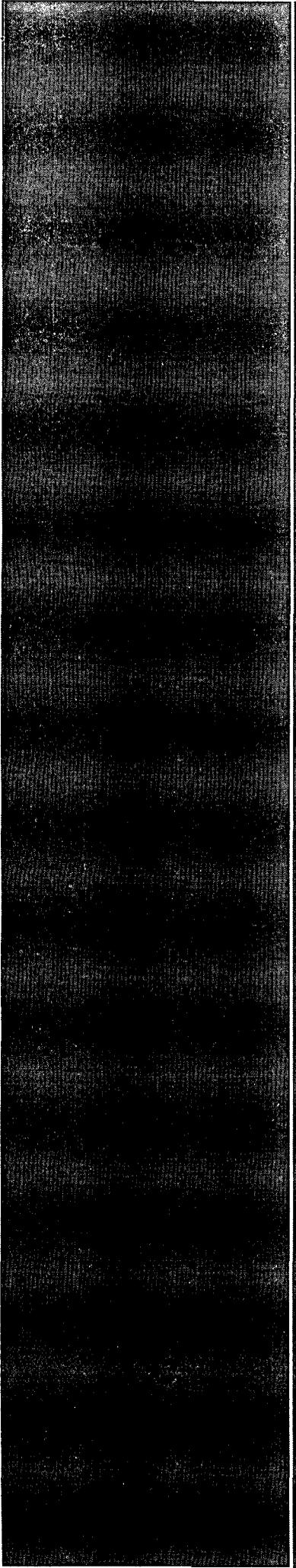
Junction Box Final report 30x45'x6' deep
SITE EXCAVATION INFORMATION

EME P.34

DATE DEPTH CL LAB PID TPH SOIL COMPOSITION

DATE	DEPTH	CL	LAB	PID	TPH	SOIL COMPOSITION
9-22-03	Bottom 6'	989	1070	15.5	48	
	4 Well	784	508	13.1	49	
	5 Test pile	694	584	18.1	62	
	N. Wall 7'	232		14.7	54	
	S. Wall 18'	667		18.2	20	
	W. Wall 15'	494		13.2	24	
	E. Wall 15'	800		17.1	73	

Tom Re



Current Photodocumentation

RICE *Operating Company* (ROC)
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Phone: (575) 393-9174 Fax: (575) 397-1471

EME P-34 (1R427-29)
Unit Letter P, Section 34, T19S, R36E



Facing North

1/11/2013



Facing East

1/11/2013