

1R - 427-350

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, February 21, 2013 10:52 AM
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 (1R427-350) Termination - ROC EME Jct H-29 Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct H-29 Site
Unit Letter H, Section 29, T19S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-350) 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 February 7, 2013 (received February 11, 2013). The reports are 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 (1R427-350) 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*

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

RECEIVED OOD

FEB 11 P 1:10

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8821

February 7, 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. H-29 (1R427-350): UL/H, Sec. 29, 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 2010, ROC initiated work on the former H-29 junction box. The site is located in UL/H, Sec. 29, T19S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 23 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 25x10x12 ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in chloride concentrations that decreased with depth. The excavated soil was blended on site and representative composite samples were collected from the excavation walls, bottom and blended backfill, resulting in a 4-wall chloride concentration of 224 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The bottom sample resulted in a chloride concentration of 96 mg/kg, and concentrations of GRO and DRO below detectable limits. The blended backfill sample resulted in a chloride concentration of 272 mg/kg, and concentrations of GRO and DRO below detectable limits. The blended backfill was returned to the excavation to one ft below grade surface (bgs). The remaining excavation was backfilled with clean imported soil and contoured to the surrounding area. On 8/23/2010, the site was seeded with a blend of native vegetation. A

junction box is no longer needed at the site. Vegetation has rebounded at the site, so no re-vegetation efforts are needed.

The junction box site location map, final report, photodocumentation, laboratory analysis, PID sheet, chloride graph 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.

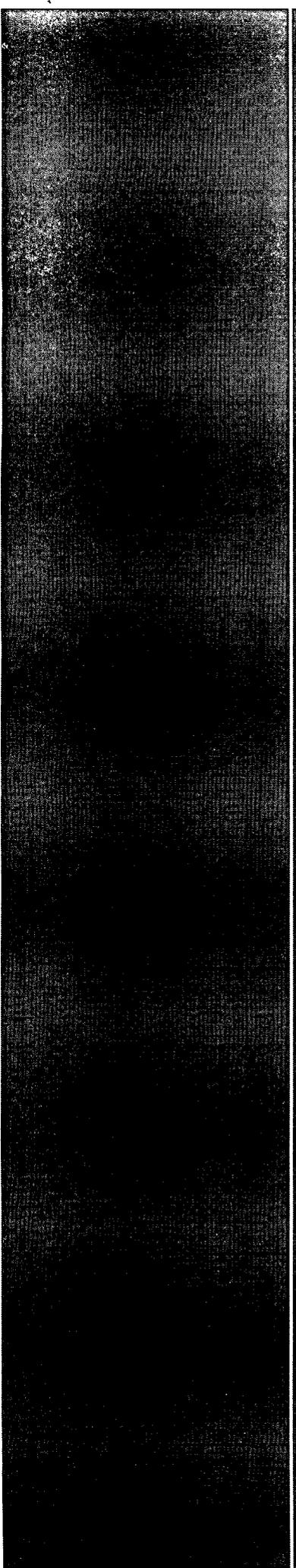
Please contact me at (575)393-9174 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,
RICE Operating Company

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

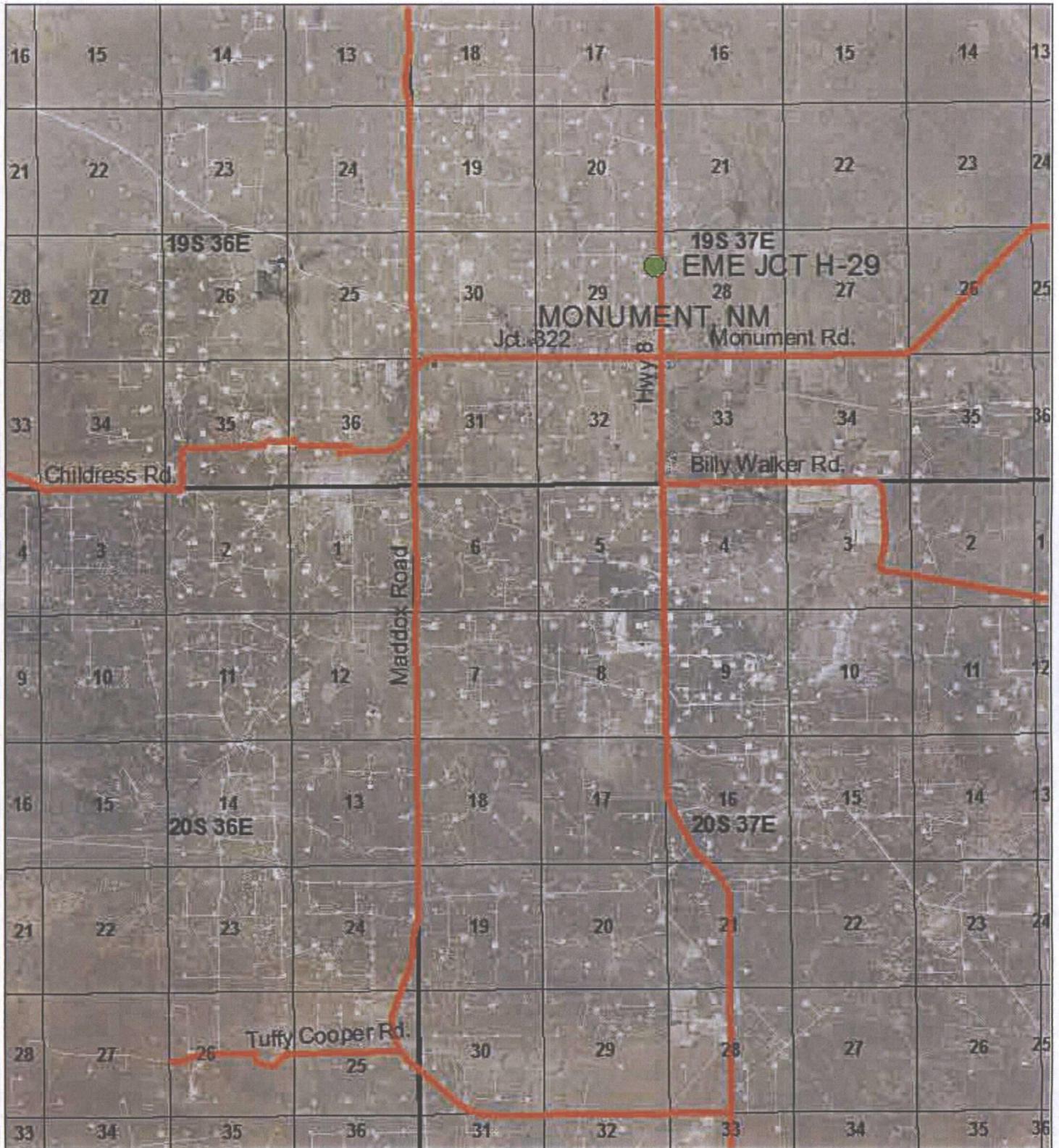
Hack Conder
Environmental Manager

enclosures



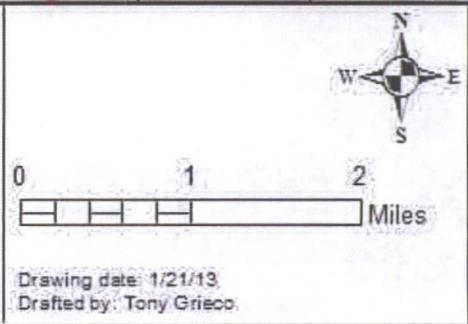
Site Location Map

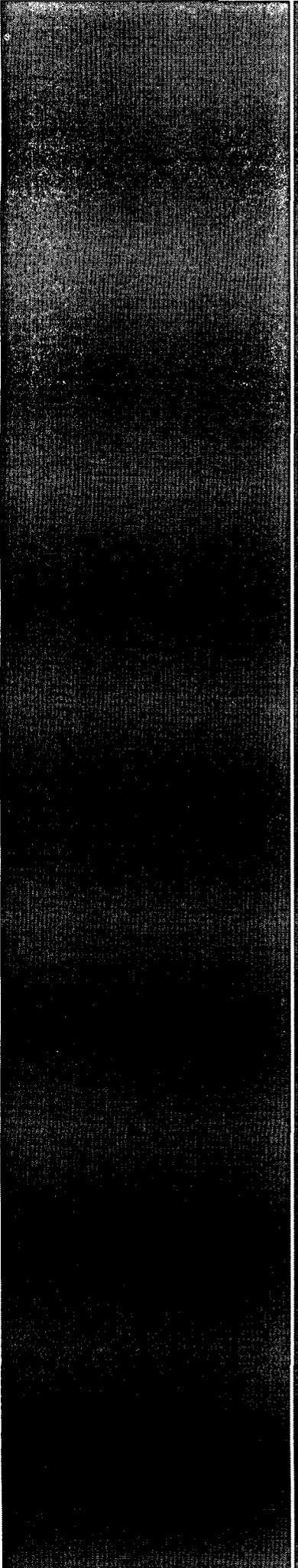
RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471



**EME
JCT H-29**

UL H SECTION 29
T-19-S R-37-E
LEA COUNTY, NM





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
Euince-Monument-Eumont (EME)	Jct. H-29	H	29	19S	37E	Lea	Eliminated		

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

Depth to Groundwater 23 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 6/8/2010 Date Completed 8/23/2010 OCD Witness no

Soil Excavated 111.1 cubic yards Excavation Length 25 Width 10 Depth 12 feet

Soil Disposed 96 cubic yards Offsite Facility C and C Landfarm Location Monument, NM

FINAL ANALYTICAL RESULTS: Sample Date 7/8/2010 Sample Depth 12 ft.

Procure 5-point composite sample of bottom and 4-point composite sample of sidewalls. TPH and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines.

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
4-WALL COMP.	0.1	<10.0	<10.0	224
BOTTOM COMP.	0.1	<10.0	<10.0	96
BACKFILL COMP.	0.1	<10.0	<10.0	272

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
4-wall comp.	n/a	255
bottom comp.	12'	80
backfill comp.	n/a	233
Delineation trench 15 ft. east of former junction (source)	2'	237
	4'	392
	6'	372
	8'	355
	10'	318
	12'	196

General Description of Remedial Action: This junction and line were eliminated during the pipeline replacement/upgrade program. After the former junction box was removed, an investigation was conducted using a backhoe to collect soil samples at regular intervals producing a 25X10X12-ft. deep excavation. Chloride field tests were performed on each sample yielded chloride concentration that relented with depth. Organic vapors were measured using a PID, which yielded low concentrations. The excavated soil was blended on site and representative samples were collected from the blended backfill, the bottom of the excavation, and the excavation walls. The representative samples were taken to a commercial laboratory for analysis of chloride and TPH, which confirmed low concentrations of each. The blended backfill was returned to the excavation to 1 ft. BGS. The remaining blended backfill and rocky soil unsuitable for vegetation around excavation was hauled to an NMOCD approved facility. The remaining excavation and surrounding area was backfilled with clean imported soil. On 8/23/2010, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

enclosures: photos, lab results, PID (field) screenings, chloride curve

SITE SUPERVISOR Joe Gatts SIGNATURE Not Available COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Zach Conder INITIAL ZC

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE Larry Bruce Baker Jr. DATE 2-24-11

EME JCT. H-29



DELINEATION TRENCH BEING EXCAVATED

6/8/2010

UNIT H, SEC. 29, T19S, R37E



SAMPLING SOURCE

6/8/2010



BACKFILLING EXCAVATION

8/2/2010



SEEDING EXCAVATION

8/23/2010



CARDINAL LABORATORIES
 101 East Marland, Hobbs, NM 88240
 (505) 393-2326 FAX (505) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: <u>Rice Operating</u>		BILL TO		ANALYSIS REQUEST											
Project Manager: <u>Bruce Baker</u>		P.O. #:													
Address: <u>122 W Taylor</u>		Company:													
City: <u>Hobbs</u> State: <u>NM</u> Zip:		Attn:													
Phone #: <u>575 393-9174</u> Fax #:		Address:													
Project #:		City:													
Project Owner:		State: Zip:													
Project Name:		Phone #:													
Project Location: <u>EME Jet H-29 19/27</u>		Fax #:													
Sampler Name:															

FOR LAB USE ONLY		(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX					PRESERV.			SAMPLING		DATE	TIME	X	Y
Lab I.D.	Sample I.D.			GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :					
<u>H20304-1</u>	<u>Both Comp @ 12'</u>	<u>C</u>	<u>1</u>			<u>X</u>				<u>X</u>			<u>7/8/10</u>	<u>11:15</u>	<u>X</u>	<u>Y</u>	
<u>2</u>	<u>4 WALL Comp 25x10</u>	<u>C</u>	<u>1</u>			<u>X</u>				<u>X</u>			<u>7/8/10</u>	<u>11:30</u>	<u>Y</u>	<u>Y</u>	
<u>3</u>	<u>Blended Backfill</u>	<u>C</u>	<u>1</u>			<u>X</u>				<u>X</u>			<u>7/8/10</u>	<u>1:02</u>	<u>X</u>	<u>Y</u>	

C1
TPH 8015

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 analysis. 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, as substitutes, affiliates or associations unless 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 remedies or otherwise.

Relinquished By: <u>J. Smith</u>	Date: <u>7/8/10</u>	Received By: <u>Jodi Hanson</u>	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
Relinquished By: <u>J. Smith</u>	Date: <u>7/8/10</u>	Received By: <u>Jodi Hanson</u>	Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Delivered By: (Circle One) <input type="checkbox"/> UPS <input type="checkbox"/> Bus. <input type="checkbox"/> Other:	Time: <u>4:40</u>	Sample Condition Cool / Intact <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	REMARKS: <u>9gatts @ rice swd</u> <u>bbaker @</u> <u>feaga</u> <u>regans</u>	
CHECKED BY: <u>JS</u>				

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476
#26

RICE OPERATING COMPANY

122 West Taylor Hobbs, NM 88240

PHONE: (575) 393-9174 FAX: (575) 397-1471

PID METER CALIBRATION & FIELD REPORT FORM

Check Model Number:

	Model: PGM 7300	Serial No: 590-000183		Model: PGM 7600	Serial No: 110-023920
	Model: PGM 7300	Serial No: 590-000508		Model: PGM 7600	Serial No: 110-013744
	Model: PGM 7300	Serial No: 590-000504	<input checked="" type="checkbox"/>	Model: PGM 7230	Serial No: 592-903318

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 928547	EXPIRATION DATE: 2/04/2013
FILL DATE:	METER READING ACCURACY: 100.1

ACCURACY: +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	H-29	H	29	19	37

SAMPLE ID	PID	SAMPLE ID	PID
15' East of source	2' 0.1		
	4' 0.1		
	6' 0.1		
	8' 0.1		
	10' 0.1		
	12' 0.1		
Bottom Comp @ 12'	0.1		
4 WALL Comp 25x10	0.1		
Blended Backfill	0.1		

COPY

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

SIGNATURE:

DATE: 7/8/10

CHLORIDE CONCENTRATION CURVE

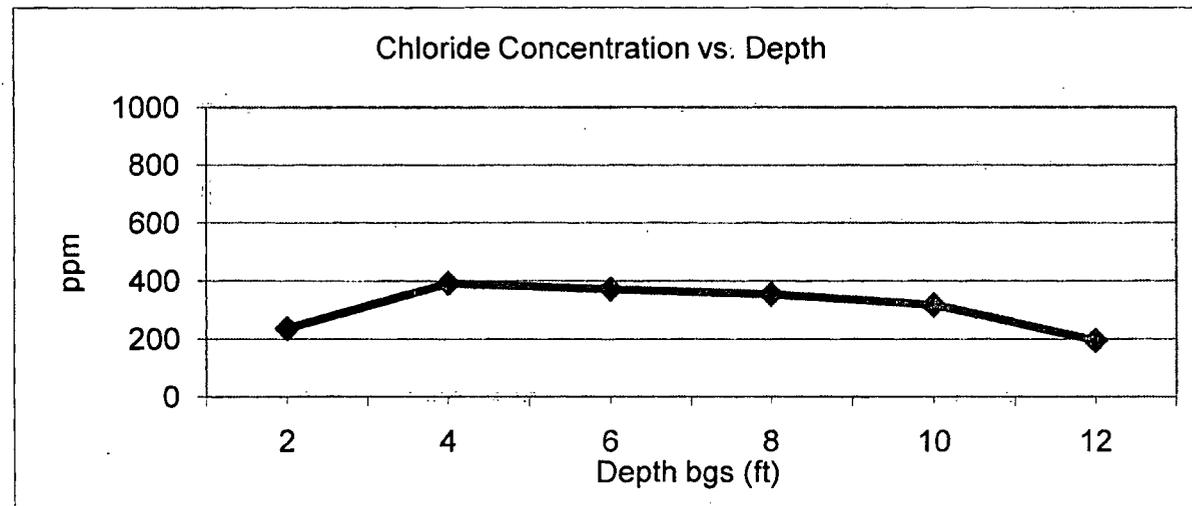
RICE Operating Company

EME Jct. H-29

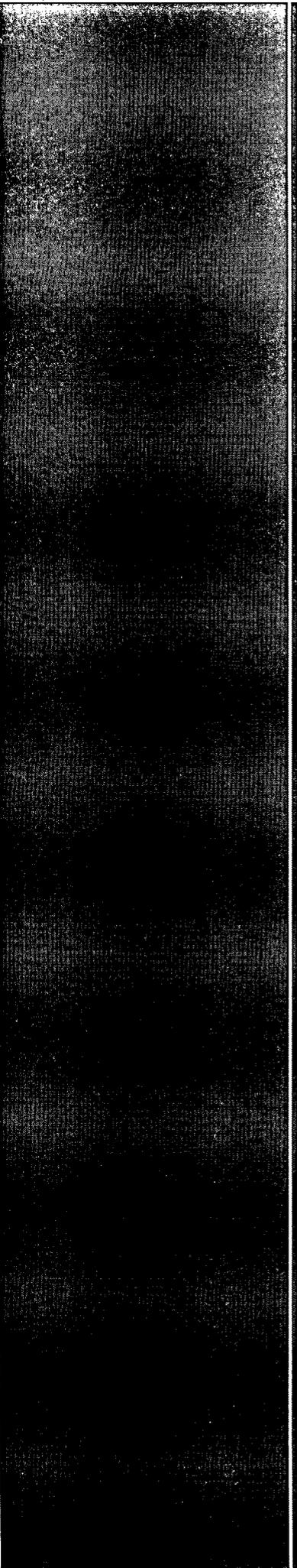
Unit 'H', Sec. 29, T19S, R37E

Delineation 15' East of Source

Depth bgs (ft)	[Cl ⁻] ppm
2	237
4	392
6	372
8	355
10	318
12	196



Groundwater = 23 ft



Current Photodocumentation

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

EME Jct. H-29

UL/H, Section 29, T19S, R37E



Facing west

2/6/2013



Facing south

2/6/2013