

1R - 427-352

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, February 26, 2013 8:55 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 (1R427-352) Termination - ROC EME Jct I-20 Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct I-20 Site
Unit Letter I, Section 20, T19S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-352) 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 (1R427-352) 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 OGD

FEB 11 P 1:10

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8807

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. I-20 (1R427-352): UL/I, Sec. 20, 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 I-20 junction box. The site is located in UL/I, Sec. 20, T19S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 35 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 10x10x12 ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in low concentrations of each. 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 16 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 32 mg/kg, and concentrations of GRO and DRO below detectable limits. The blended backfill sample resulted in a chloride concentration of 32 mg/kg, and concentrations of GRO and DRO below detectable limits. The blended backfill was returned to the excavation 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.

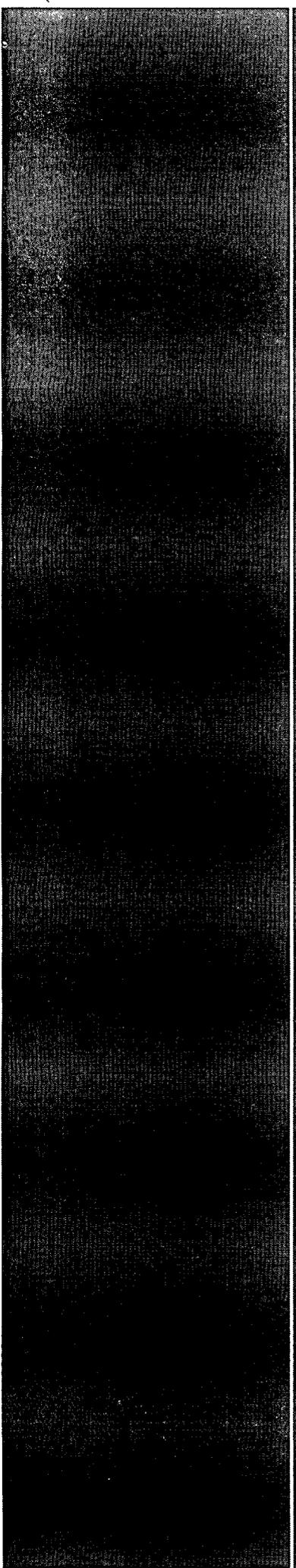
Please contact me at (575)393-9174 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,
RICE Operating Company

A handwritten signature in black ink, appearing to read "H. Conder", written in a cursive style.

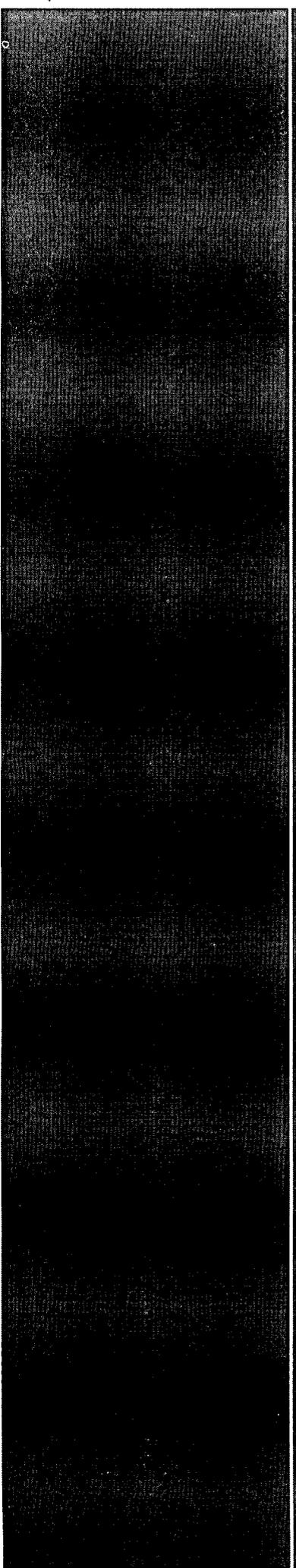
Hack Conder
Environmental Manager

enclosures



Site Location Map

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



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
Evince-Monument-Eumont (EME)	Jct. I-20	I	20	19S	37E	Lea	Eliminated		

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

Depth to Groundwater 35 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

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

Soil Excavated 44.4 cubic yards Excavation Length 10 Width 10 Depth 12 feet

Soil Disposed 72 cubic yards Offsite Facility C&C Land Farm Location Monument, NM

FINAL ANALYTICAL RESULTS: Sample Date 6/24/2010 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	16
BOTTOM COMP.	0.1	<10.0	<10.0	32
BACKFILL COMP.	0.1	<10.0	<10.0	32

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
4-wall comp.	n/a	57
bottom comp.	12'	58
backfill comp.	n/a	53
Delineation trench at 5' north of former junction box (Source)	2'	59
	4'	56
	6'	56
	8'	55
	10'	60
	12'	54

General Description of Remedial Action: This junction and line was 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 10x10x12-ft-deep excavation. Chloride field tests were

performed on each sample which yielded low concentrations. Organic vapors, measured using a PID, yielded low concentrations

of organic vapors. The excavated soil was blended on site and representative composite samples were collected from the excavation

walls, bottom, and blended backfill. The representative composite samples were sent to a commercial laboratory for analysis of TPH

and chloride. Laboratory analysis confirmed low concentrations of chloride and organics were non detected. The excavation was

backfilled with the blended backfill to ground surface and contoured to the surrounding area. 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

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

SITE SUPERVISOR Joe Gatts SIGNATURE _____ n/a COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Larry Bruce Baker Jr. INITIAL LBB

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE Larry Bruce Baker Jr. DATE 3-10-11

EME JCT. I-20

Unit I, Section 20, T19S, R37E



Digging delineation trench

6/8/2010



Backfilling site

7/29/2010



Seeding site

8/23/2010



Site complete

8/23/2010



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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: <i>Rice Operating Company</i>		BILL TO		ANALYSIS REQUEST													
Project Manager: <i>Bruce Baker</i>		P.O. #:		<div style="text-align: center; font-size: 2em; opacity: 0.5;">COPY</div>													
Address: <i>122 W. Taylor</i>		Company:															
City: <i>Hobbs</i> State: <i>NM</i> Zip: <i>88240</i>		Attn:															
Phone #: <i>575-393-9674</i> Fax #: <i>575-397-1471</i>		Address:															
Project #:		City:															
Project Name:		State: Zip:															
Project Location: <i>EM12 Jct I-20 19/37</i>		Phone #:															
Sampler Name:		Fax #:														<div style="text-align: center; font-size: 2em;">CI. TPA 8015</div>	
FOR LAB USE ONLY																	
Lab I.D.	Sample I.D.		(GIRAB OR C)OMP.	# CONTAINERS	MATRIX						PRESERV.		SAMPLING				
					GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER	ACID/BASE	ICE/COOL	OTHER	DATE	TIME		
<i>H20211-1</i>	<i>Bottom Comp @ 12'</i>		<i>C</i>	<i>1</i>		<i>X</i>					<i>X</i>			<i>6/24/00</i>	<i>2:10</i>	<i>X</i>	<i>X</i>
<i>2</i>	<i>4 WALL Comp</i>		<i>C</i>	<i>1</i>		<i>X</i>					<i>X</i>			<i>6/24/00</i>	<i>2:15</i>	<i>X</i>	<i>X</i>
<i>3</i>	<i>Remediation Test Backfill</i>		<i>C</i>	<i>1</i>		<i>X</i>					<i>X</i>			<i>6/24/00</i>	<i>1:45</i>	<i>X</i>	<i>X</i>

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 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 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.

Relinquished By: <i>Joe D...</i>		Date: <i>6/24/00</i>		Received By: <i>Jodi Henson</i>		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No		Add'l Phone #:	
Relinquished By:		Date: <i>6/24/00</i>		Received By:		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No		Add'l Fax #:	
Delivered By: (Circle One)		Time: <i>4:28</i>		Sample Condition		CHECKED BY: <i>JH</i>		REMARKS: <i>Email All</i>	
Sampler - UPS - Bus - Other:				Cool/Intact					
				<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			

† 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 7300 Serial No: 590-000508
 Model: PGM 7300 Serial No: 590-000504

✓

Model: PGM 7600 Serial No: 110-023920
 Model: PGM 7600 Serial No: 110-013744
 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	I-20	I	20	19	37

SAMPLE ID	PID	SAMPLE ID	PID
Bottom Composite @ 12'	0.1		
4 WALL composite	0.1		
Remediated Backfill	0.1		

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

SIGNATURE: *Jim Satt*

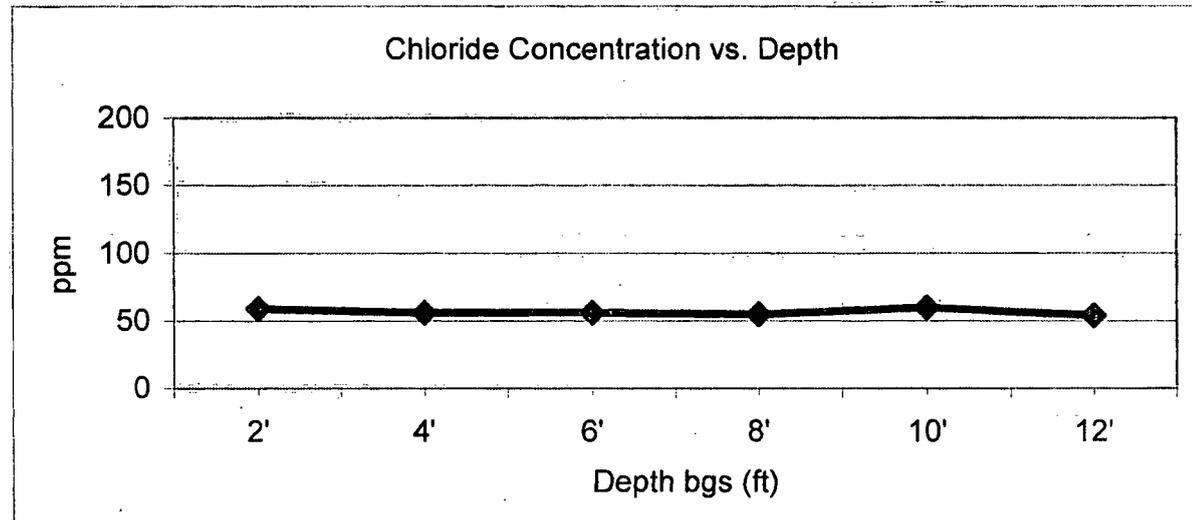
DATE: **6/24/10**

EME Jct. I-20

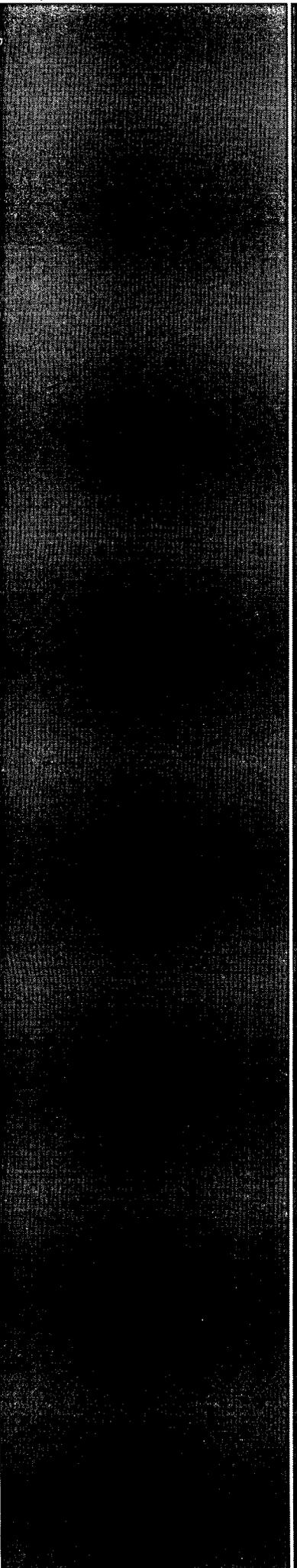
Unit 'I', Sec. 20, T19S, R37E

Backhoe samples 5 ft. north of the junction (source)

Depth bgs (ft)	[Cl ⁻] ppm
2'	59
4'	56
6'	56
8'	55
10'	60
12'	54



Groundwater = 35 ft



Current Photodocumentation

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

EME Jct. I-20

UL/I, Section 20, T19S, R37E



Facing northeast

2/5/2013



Facing southeast

2/5/2013