

1R - 427-367

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, February 28, 2013 9:45 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); sharon.hall@arcadis-us.com
Subject: Remediation Plan (1R427-367) Termination - ROC EME I-18 EOL Site

**RE: Termination Request
for the Rice Operating Company's
EME I-18 EOL Site
Unit Letter I, Section 18, T19S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-367) 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 31, 2013 (received February 4, 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 (1R427-367) 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



RECEIVED OOD

2013 FEB -4 P 1:28

ARCADIS U.S., Inc.
1004 North Big Spring Street
Suite 300
Midland
Texas 79701
Tel 432.687.5400
Fax 432.687.5401
www.arcadis-us.com

Sent Certified Mail
Return Receipt No. 7002 2410 0001 5813 4118

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

Environmental

Subject:

**Termination Request
EME I-18 EOL
Unit I, SEC. 18, T19S, R37E, Monument, Lea County, New Mexico
NMOCD CASE # 1R427-367**

Date:
January 31, 2013

Contact:
Sharon Hall

Mr. Hansen:

Phone:
432.687.5400

RICE Operating Company (ROC) has retained ARCADIS U.S., Inc. (ARCADIS) to address potential environmental concerns at the above-referenced site. On behalf of ROC, ARCADIS respectfully submits this Termination Request for the EME I-18 EOL site.

Email:
sharon.hall@arcadis-us.com

Our ref:
MT001105.0001

An Investigation and Characterization Plan (ICP) Report and Corrective Action Plan (CAP) was submitted on October 23, 2012 and approved by NMOCD on November 1, 2012. The approved plan proposed that the site be scraped to a depth of 6 inches to one foot, backfilled, and seeded with native vegetation, with the addition of site amendments as needed.

ARCADIS U.S., Inc.
TX Engineering License # F-533

ROC mobilized to the site to perform the approved CAP activities and discovered that the site had been encompassed in the remedial activities for a nearby facility. Photographs of the site prior to and following the remedial actions are attached. Since the approved CAP has been addressed by another party, ROC requests termination of the site.

ROC is the service provider (agent) for the EME 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

ARCADIS

Mr. Ed Hansen
January 31, 2013

ownership/usage basis. Therefore, your timely review of this submission is greatly appreciated.

Thank you for your consideration concerning this Termination Request. If you have any questions, do not hesitate to contact Hack Conder or me.

Sincerely,

ARCADIS U.S., Inc.



Sharon E. Hall
Associate Vice President

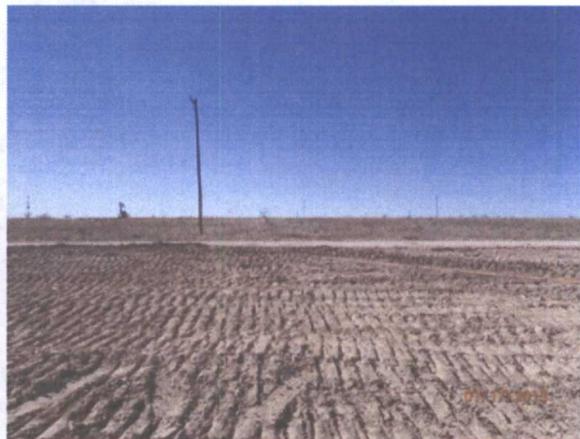
Copies:
Hack Conder, ROC

Attachment:
Site Photographs

EME I-18 EOL (1R427-367)
Unit Letter I, Section 18, T19S, R37E



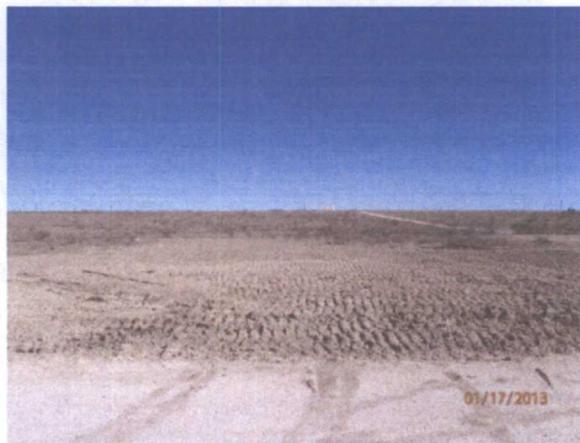
Facing West, 10/1/2012



Facing West, 1/17/2013



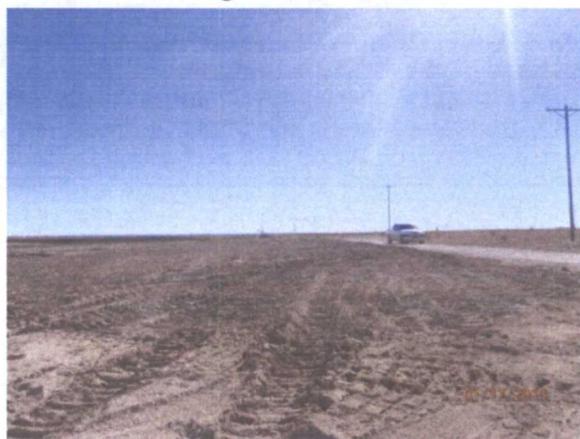
Facing East, 10/1/2012



Facing East, 1/17/2013



Facing South, 10/1/2012



Facing South, 1/17/2013

Hansen, Edward J., EMNRD

From: Katie Jones <kjones@riceswd.com>
Sent: Friday, February 22, 2013 8:40 AM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder; Laura Pena; Hall, Sharon
Subject: EME I-18 EOL (1R427-367) Termination Request Addendum
Attachments: ROC - EME I-18 EOL (1R427-367) Termination Request 1.31.13.pdf; ROC - EME I-18 EOL (1R427-367) Seeding Photo Page.pdf; ROC - EME I-18 EOL (1R427-367) Reveg Form.pdf

Mr. Hansen,

The attached information is an Addendum to the EME I-18 EOL (1R427-367) Termination Request submitted to the NMOCD on January 31, 2013.

According to the Termination Request, "ROC mobilized to the site to perform the approved CAP activities and discovered that the site had been encompassed in the remedial activities for a nearby facility."

To ensure that the remediated site had been seeded, RECS was onsite on February 18, 2013 to seed the site with a blend of native vegetation. Photographs and a revegetation form detailing the work are attached.

ROC acknowledges they have met the requirements of NMAC 19.15.29 NMAC (Part 29) and respectfully requests 'remediation termination' or similar closure status.

Thank you.

Katie Jones
Environmental Project Manager
RICE Operating Company



PO Box 5630
 Hobbs, NM 88241
 Phone: (575) 393-4411
 Fax: (575) 393-0293

REVEGETATION FORM

1. General Information

| | | | | | | |
|---|---------------|-----------------|--------------|--|---------------------------|----------------------------|
| Site name: EME I-18 EOL | | | | | | |
| U/L I | Section 18 | Township 19S | Range 37E | County Lea | Latitude N32°39'26.32" | Longitude W103°17'4.08" |
| Contact Name: Hack Conder | | | | | | |
| Email: hconder@rice-ecs.com | | | | | | |
| Site size: 3,000 | | square feet | | Map detail of site attached <input type="checkbox"/> | | |
| Additional information: | | | | | | |

2. Soils

**Do not rip caliche subsoils: caliche rocks brought to the surface by ripping shall be removed.*

| | | | | | | |
|--|---|--|----------------------------------|-------------------------------------|--|--|
| Salvaged from site <input checked="" type="checkbox"/> | Bioremediated <input type="checkbox"/> | Imported <input type="checkbox"/> | Blended <input type="checkbox"/> | Depth (in): | | |
| Texture: Sandy | Describe soil & subsoil: Tan Sand and Caliche | | | | | |
| Soil prep methods: Rip <input type="checkbox"/> | Depth(in): | Disc <input checked="" type="checkbox"/> | Depth (in): 3" | Rollerpack <input type="checkbox"/> | | |
| Date completed: 2/14/2011 | | | | | | |

3. Bioremediation

| | | |
|-------------------------------------|------------------------------|--------------------------------|
| Fertilizer <input type="checkbox"/> | Hay <input type="checkbox"/> | Other <input type="checkbox"/> |
| Type: | Describe: | |
| Lbs/acre: | | |

4. Seeding

**Attach seed bag tags to this form. Seed bag tags shall contain the site name and S-T-R.*

| | | | |
|--|---|--|-------------------------|
| Custom seed mix <input checked="" type="checkbox"/> | Prescribed mix <input type="checkbox"/> | Seed mix name: 5 lbs. Lea County/5 lbs. Winter Wheat/5 lbs. Blue Grama | Seeding date: 2/18/2013 |
| Broadcast <input checked="" type="checkbox"/> | | | |
| Method: Mechanical Seeder | | | |
| Soil conditions during seeding: Dry <input checked="" type="checkbox"/> Damp <input type="checkbox"/> Wet <input type="checkbox"/> | | | |
| Photos attached <input type="checkbox"/> | Observations: | | |
| Number of photos: | The seed was tilled into soil. | | |

5. Certification

I hereby certify that the information in this form and attachments is true and complete to the best of my knowledge and belief.

| | | |
|-------------------------------|---------------------------|-----------------|
| Name: Kyle Norman | Title: Environmental Tech | Date: 2/18/2013 |
| Signature: <i>Kyle Norman</i> | | |

EME I-18 EOL (1R427-367)
Unit letter I, Section 18, T19S, R37E



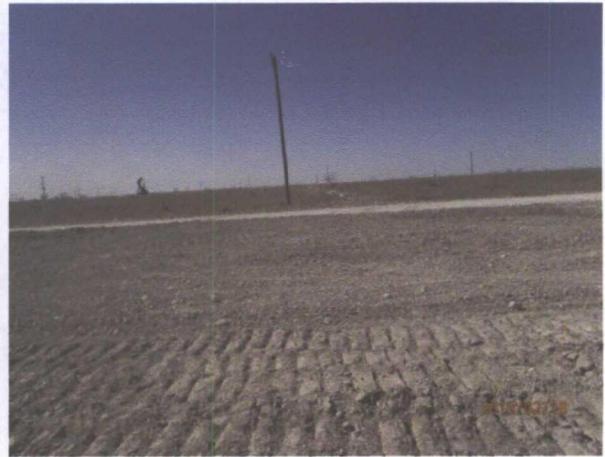
site prior to seeding, facing west
2/18/2013



tilling the site, facing west
2/18/2013



seeding the site, facing east
2/18/2013



site complete, facing west
2/18/2013