

1R - 427-358

**APPROVALS**

**YEAR(S):**

2013

**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Thursday, March 07, 2013 5:17 PM  
**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 (1R427-358) Termination - ROC EME B-13 EOL Site

**RE: Termination Request  
for the Rice Operating Company's  
EME B-13 EOL Site  
Unit Letter B, Section 13, T20S, R36E, NMPM, Lea County, New Mexico  
Remediation Plan (1R427-358) 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 14, 2013 (received February 19, 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 (1R427-358) 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

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8845

**RECEIVED**

**February 14, 2013**

**FEB 10 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

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

RE: Termination Request  
EME B-13 EOL (1R427-358): UL/B, Sec. 13, T20S, 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 2010, ROC initiated work on the former B-13 EOL junction box. The site is located in UL/B, Sec. 13, T20S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 32 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x3x7 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 7 ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride, gasoline range organics (GRO), and diesel range organics (DRO) concentration below detectable limits. The excavated soil was returned to the excavation and contoured to the surrounding area. On 3/8/2011, 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



Hack Conder  
Environmental Manager

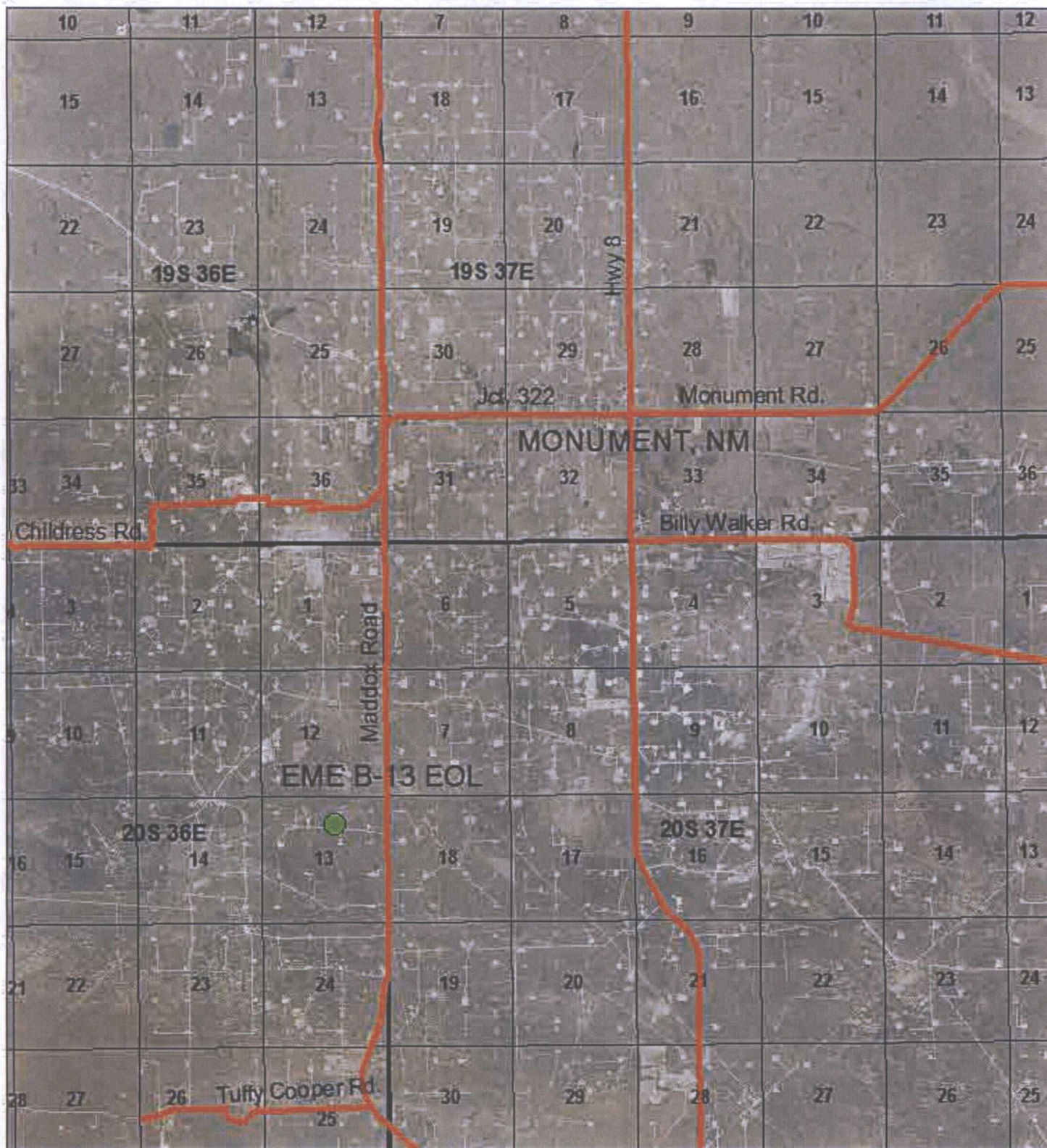
enclosures

RECEIVED OGD  
2013 FEB 19 P 3:14



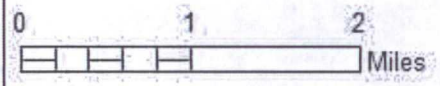
## Site Location Map

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



# EME B-13 EOL

UL B SECTION 13  
T-20-S R-36-E  
LEA COUNTY, NM



Drawing date: 1/21/13  
Drafted by: Tony Grieco





# Junction Box Report

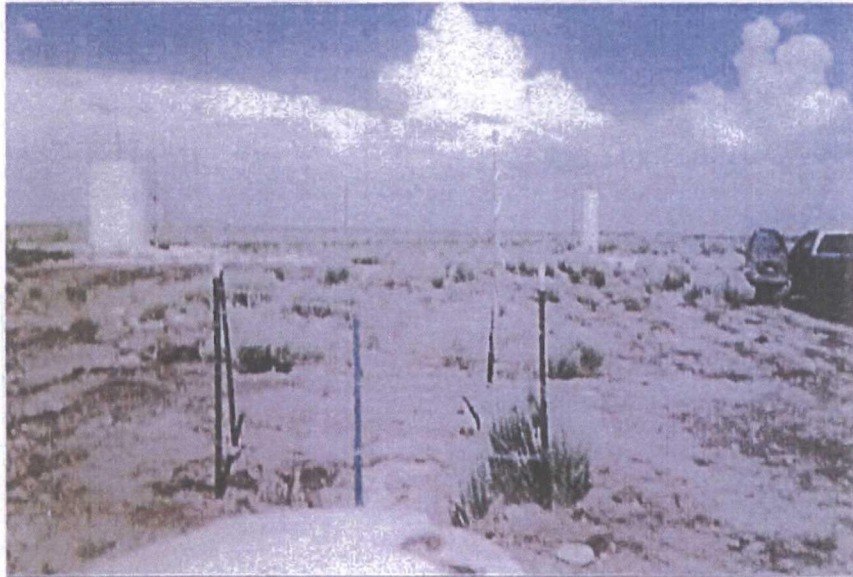
**RICE *Operating Company* (ROC)**  
112 West Taylor Hobbs, NM 88240  
Phone: (575) 393-9174 Fax: (575) 397-1471





# EME B-13 EOL

Unit B, Section13, T20S, R36E



Site prior to delineation

6/14/2010



Collecting samples

6/15/2010



Seeding site

3/8/2011



Covering seed

3/8/2011



ANALYTICAL RESULTS FOR  
 RICE OPERATING COMPANY  
 ATTN: BRUCE BAKER  
 112 W. TAYLOR  
 HOBBS, NM 88240

COPY


Receiving Date: 06/15/10  
 Reporting Date: 06/17/10  
 Project Number: NOT GIVEN  
 Project Name: EME B-13 EOL (20/36)  
 Project Location: EME B-13 EOL (20/36)

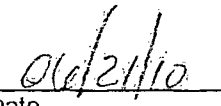
Sampling Date: 06/15/10  
 Sample Type: SOIL  
 Sample Condition: COOL & INTACT  
 Sample Received By: JH  
 Analyzed By: AB/HM

	GRO	DRO	CI*
	(C <sub>6</sub> -C <sub>10</sub> )	(>C <sub>10</sub> -C <sub>28</sub> )	
LAB NUMBER	(mg/kg)	(mg/kg)	(mg/kg)

ANALYSIS DATE	06/16/10	06/16/10	06/16/10
H20121-1 SOURCE @ 7'	<10.0	<10.0	< 16
Quality Control	504	460	500
True Value QC	500	500	500
% Recovery	101	92.0	100
Relative Percent Difference	0.2	1.0	< 0.1

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI: Std. Methods 4500-CI B  
 \*Analysis performed on a 1:4 w:v aqueous extract.  
 Reported on wet weight.

  
 Chemist

  
 Date

H20121 TCL RICE

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# CHAIN-OF-CUSTODY AND ANALYSIS REQUEST



## CARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603  
 (505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

Company Name: <u>Rice Operating Company</u>		<b>BILL TO</b>		<b>ANALYSIS REQUEST</b>											
Project Manager: <u>Bruce Baker</u>		P.O. #:		COPY											
Address: <u>122 W. Taylor</u>		Company:													
City: <u>Hobbs</u> State: <u>NM</u> Zip: <u>88240</u>		Attn:													
Phone #: <u>575-393-9174</u> Fax #: <u>575-397-1471</u>		Address:													
Project #: _____ Project Owner: _____		City:													
Project Name: <u>EME B-13 Eo1 20/36</u>		State: _____ Zip: _____													
Project Location: _____		Phone #: _____													
Sampler Name: <u>J. Gatts</u>		Fax #: _____													

Lab I.D.	Sample I.D.	(GIRABOR (C)OMP. # CONTAINERS	MATRIX						PRESERV.			SAMPLING		DATE	TIME	C.I.	TPH	8015 M
			GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE/COOL	OTHER:							
H20121-1	Source @ 7'	6	1			X					X			6/15/10	9:15	X	X	

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, 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: <u>J. Gatts</u>	Date:	Received By:	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
	Time:		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Relinquished By:	Date: <u>6/15/10</u>	Received By: <u>Jodi Henson</u>	REMARKS: <u>E-Mail Results To:</u>	
	Time: <u>9:30</u>		<u>K Jones @ Riccsud.com</u>	
			<u>Baker " " "</u>	
			<u>Kegan " " "</u>	
Delivered By: (Circle One)	Sample Condition	CHECKED BY:		
<input checked="" type="checkbox"/> Sample - UPS - Bus - Other:	Cool Intact	(initials)		
	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>JH</u>		
	<input type="checkbox"/> Yes <input type="checkbox"/> No			

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

#26

COPY

# 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:

<input type="checkbox"/>	Model: PGM 7300	Serial No: 590-000183	<input type="checkbox"/>	Model: PGM 7600	Serial No: 110-023920
<input type="checkbox"/>	Model: PGM 7300	Serial No: 590-000508	<input type="checkbox"/>	Model: PGM 7600	Serial No: 110-013744
<input type="checkbox"/>	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	B-13 E01	B	13	20	36

SAMPLE ID	PID	SAMPLE ID	PID
Background @ 6"	∅		
Source @ 3'	0.3		
Source @ 4'	∅		
Source @ 5'	∅		
Source @ 6'	∅		
Source @ 7'	∅		

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

SIGNATURE:

*Joe Natt*

DATE:

6/15/10

CHLORIDE CONCENTRATION CURVE

RICE Operating Company

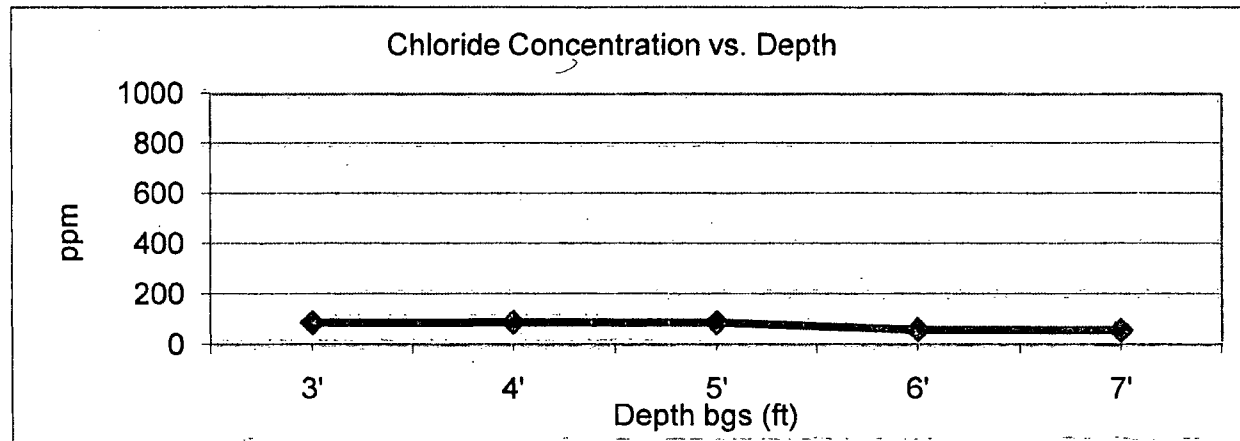
**EME B-13 EOL**

Unit, B. Sec. 13 (T20S-R36E)

Backhoe samples at the junction (source)

Depth bgs (ft)	[Cl <sup>-</sup> ] ppm
3'	87
4'	88
5'	87
6'	59
7'	56

Groundwater = 32 ft.



# Current Photodocumentation

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



**EME B-13 EOL**  
UL/B, Section 13, T20S, R36E



Facing southwest

12/31/2012



Facing south

12/31/2012