

1R - 427-68

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, March 25, 2013 4:19 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 (1R427-68) Termination - ROC EME H-32-1 Site

**RE: Termination Request
for the Rice Operating Company's
EME H-32-1 Site
Unit Letter H, Section 32, T19S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-68) 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 March 8, 2013 (received March 13, 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 (1R427-68) 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 9279

RECEIVED

March 8, 2013

MAR 13 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 H-32-1 (1R427-68): UL/H, Sec. 32, 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 2002, ROC initiated work on the former H-32-1 junction box. The site is located in UL/H, Sec. 32, T19S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 25 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 25x20x14 ft deep excavation. Each sample was field titrated for chlorides, resulting in concentrations that decreased with depth. Representative samples were collected from the excavation walls and excavation bottom and sent to a commercial laboratory for analysis. The sidewall sample resulted in a chloride concentration of 10 mg/kg and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The bottom composite sample resulted in a chloride concentration of 10 mg/kg and GRO and DRO concentrations below detectable limits. Both samples were also analyzed for BTEX, resulting in concentrations below detectable limits. A total of 96 cubic yards of excavated soil was properly disposed of at a NMOCD facility. A compacted clay liner was installed and the excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area. Vegetation has rebounded at the site, so no re-vegetation efforts are needed. Vegetation above the liner will act as an evapo-transpiration barrier that will also inhibit the downward migration of residual chlorides

and hydrocarbons. Plants capture water through their roots and so reduce the amount of water infiltrating below the root zone. A new, watertight junction was installed and has since been eliminated.

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.

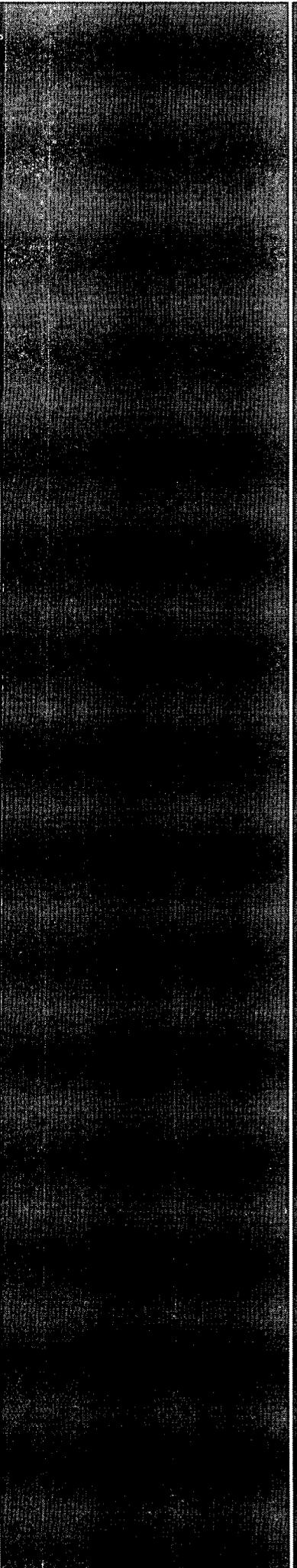
Sincerely,
RICE Operating Company



Hack Conder
Environmental Manager

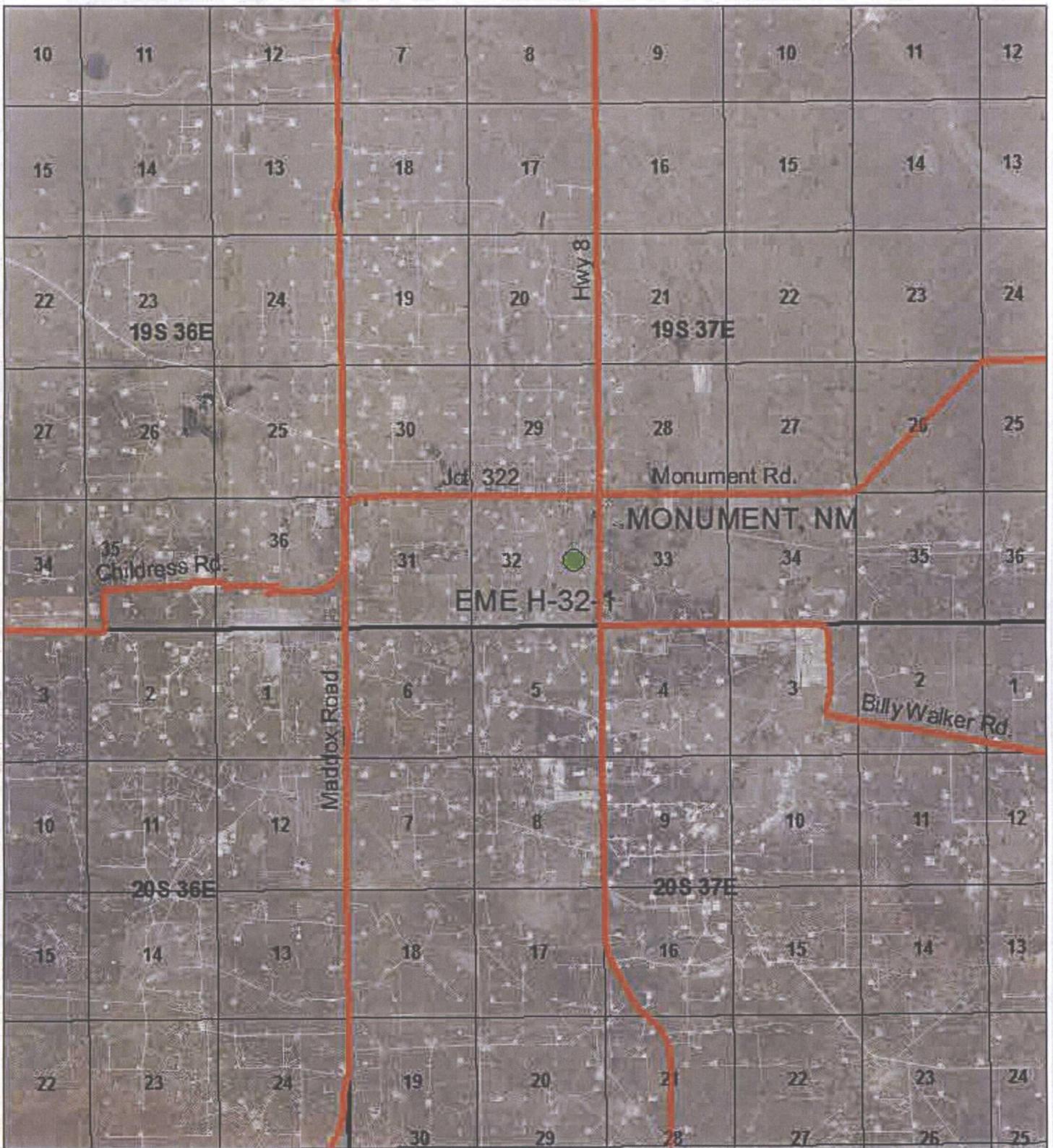
enclosures

RECEIVED OCD
2013 MAR 13 P 2:27



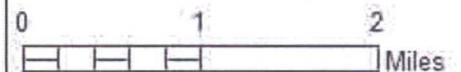
Site Location Map

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

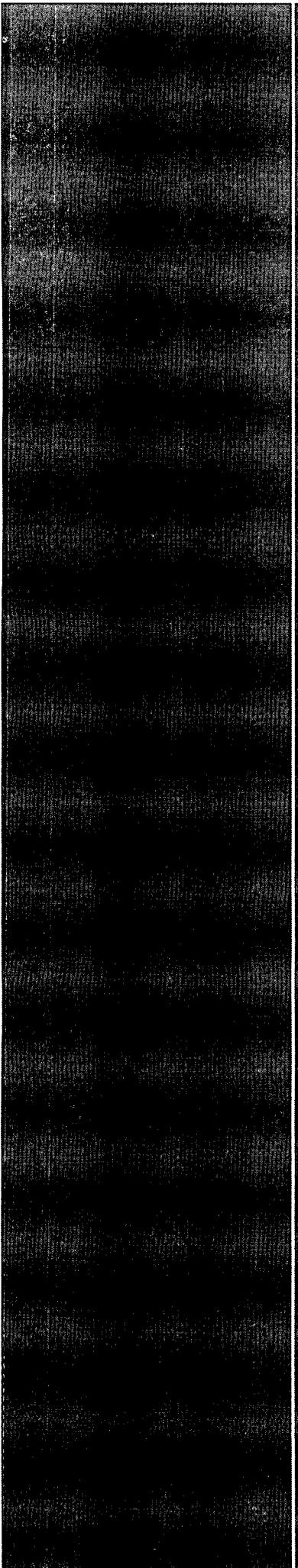


**EME H-32-1
(1R427-68)**

Unit Letter H, Section 32,
T19S, R37E
Lea County, NM



Drawing date: 3/5/13



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 | H-32-1 | H | 32 | 19S | 37E | LEA | 12 | 10 | 5 |

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER IRVING BOYD OTHER _____

Depth to Groundwater 25 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 4/15/2002 Date Completed 4/17/2002 OCD Witness NO

Soil Excavated 150 cubic yards Excavation Length 25 Width 20 Depth 14 feet

Soil Disposed 96 cubic yards Offsite Facility C&C LANDFARM Location MONUMENT, NM

FINAL ANALYTICAL RESULTS: Sample Date 4/16/2002 Sample Depth 14'

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 | Benzene mg/kg | Toluene mg/kg | Ethyl Benzene mg/kg | Total Xylenes mg/kg | GRO mg/kg | DRO mg/kg | Chlorides mg/kg |
|-----------------|---------------|---------------|---------------------|---------------------|-----------|-----------|-----------------|
| SIDEWALLS | <0.025 | <0.025 | <0.025 | <0.025 | <10 | <10 | 10 |
| BOTTOM | <0.025 | <0.025 | <0.025 | <0.025 | <10 | <10 | 10 |

General Description of Remedial Action: Delineated vertical and lateral extent.

Vertical trench demonstrated TPH dropped from 9500 ppm @ 8' to 39 ppm @ 14' and chlorides dropped from 1250 ppm to 50 ppm. High impact soil was removed and hauled to permitted disposal facility. Installed a compacted clay liner and water proof junction box. Backfilled with clean soil.

CHLORIDE FIELD TESTS

| LOCATION | DEPTH | mg/kg |
|-----------------|-------|-------|
| SIDEWALLS | 12' | 30 |
| BOTTOM | 14' | 30 |
| Vertical Trench | 8' | 1250 |
| | 10' | 100 |
| | 12' | 50 |
| | 14' | 50 |
| | | |
| | | |
| | | |
| | | |

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

DATE May 16, 2002 PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

ANALYTICAL REPORT

Prepared for:

Derek Robinson
RE Environmental
P.O. Box 13418
Odessa, TX 79764

Project: Rice Operating

H-32-1

Order#: G0203093

Report Date: 04/19/2002

Certificates

US EPA Laboratory Code TX00158

ENVIRONMENTAL LAB OF TEXAS

SAMPLE WORK LIST

RE Environmental
P.O. Box 13418
Odessa, TX 79764
366-0804

Order#: G0203093
Project:
Project Name: Rice Operating
Location: H-32-1

The samples listed below were submitted to Environmental Lab of Texas and were received under chain of custody. Environmental Lab of Texas makes no representation or certification as to the method of sample collection, sample identification, or transportation/handling procedures used prior to the receipt of samples by Environmental Lab of Texas.

| <u>Lab ID:</u> | <u>Sample :</u> | <u>Matrix:</u> | <u>Date / Time</u> <u>Collected</u> | <u>Date / Time</u> <u>Received</u> | <u>Container</u> | <u>Preservative</u> |
|-------------------|-------------------------|----------------|--|---------------------------------------|------------------|---------------------|
| 0203093-01 | 4 pt. Wall Comp. @ 12' | SOIL | 4/16/02 15:30 | 4/17/02 8:00 | 4 oz glass | Ice |
| | <u>Lab Testing:</u> | Rejected: No | | Temp: 18.0 C | | |
| | 8015M | | | | | |
| | 8021B/5030 BTEX | | | | | |
| | Chloride | | | | | |
| 0203093-02 | 5 pt Bottom Comp. @ 14' | SOIL | 4/16/02 16:55 | 4/17/02 8:00 | 4 oz glass | Ice |
| | <u>Lab Testing:</u> | Rejected: No | | Temp: 18.0 C | | |
| | 8015M | | | | | |
| | 8021B/5030 BTEX | | | | | |
| | Chloride | | | | | |

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Derek Robinson
 RE Environmental
 P.O. Box 13418
 Odessa, TX 79764

Order#: G0203093
 Project:
 Project Name: Rice Operating
 Location: H-32-1

Lab ID: 0203093-01
 Sample ID: 4 pt. Wall Comp. @ 12'

8015M

| <u>Method</u> | <u>Date</u> | <u>Date</u> | <u>Sample</u> | <u>Dilution</u> | <u>Analyst</u> | <u>Method</u> |
|---------------|-------------|-------------|---------------|-----------------|----------------|---------------|
| Blank | Prepared | Analyzed | Amount | Factor | CK | 8015M |
| | | 4/18/02 | 1 | 1 | | |

| Parameter | Result mg/kg | RL |
|---------------|-----------------|------|
| DRO, >C12-C35 | <10.0 | 10.0 |
| GRO, C6-C12 | <10.0 | 10.0 |
| TOTAL, C6-C35 | <10.0 | 10.0 |

8021B/5030 BTEX

| <u>Method</u> | <u>Date</u> | <u>Date</u> | <u>Sample</u> | <u>Dilution</u> | <u>Analyst</u> | <u>Method</u> |
|---------------|-------------|------------------|---------------|-----------------|----------------|---------------|
| Blank | Prepared | Analyzed | Amount | Factor | CK | 8021B |
| 0001325-02 | | 4/17/02 10:26 | 1 | 25 | | |

| Parameter | Result µg/kg | RL |
|--------------|-----------------|------|
| Benzene | <25.0 | 25.0 |
| Ethylbenzene | <25.0 | 25.0 |
| Toluene | <25.0 | 25.0 |
| p/m-Xylene | <25.0 | 25.0 |
| o-Xylene | <25.0 | 25.0 |

Lab ID: 0203093-02
 Sample ID: 5 pt Bottom Comp. @ 14'

8015M

| <u>Method</u> | <u>Date</u> | <u>Date</u> | <u>Sample</u> | <u>Dilution</u> | <u>Analyst</u> | <u>Method</u> |
|---------------|-------------|-------------|---------------|-----------------|----------------|---------------|
| Blank | Prepared | Analyzed | Amount | Factor | CK | 8015M |
| | | 4/18/02 | 1 | 1 | | |

| Parameter | Result mg/kg | RL |
|---------------|-----------------|------|
| DRO, >C12-C35 | <10.0 | 10.0 |
| GRO, C6-C12 | <10.0 | 10.0 |
| TOTAL, C6-C35 | <10.0 | 10.0 |

DL = Diluted out N/A = Not Applicable RL = Reporting Limit

Page 1 of 2

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Derek Robinson
RE Environmental
P.O. Box 13418
Odessa, TX 79764

Order#: G0203093
Project:
Project Name: Rice Operating
Location: H-32-1

Lab ID: 0203093-02
Sample ID: 5 pt Bottom Comp. @ 14'

8021B/5030 BTEX

| <u>Method</u> | <u>Date</u> | <u>Date</u> | <u>Sample</u> | <u>Dilution</u> | <u>Analyst</u> | <u>Method</u> |
|---------------|-----------------|------------------|---------------|-----------------|----------------|---------------|
| <u>Blank</u> | <u>Prepared</u> | <u>Analyzed</u> | <u>Amount</u> | <u>Factor</u> | | |
| 0001325-02 | | 4/17/02 10:47 | 1 | 25 | CK | 8021B |

| Parameter | Result µg/kg | RL |
|--------------|-----------------|------|
| Benzene | <25.0 | 25.0 |
| Ethylbenzene | <25.0 | 25.0 |
| Toluene | <25.0 | 25.0 |
| p/m-Xylene | <25.0 | 25.0 |
| o-Xylene | <25.0 | 25.0 |

Approval: *Ral K Tuttle* 4-22-02
Raland K. Tuttle, Lab Director, QA Officer Date
Celey D. Keene, Org. Tech. Director
Jeanne McMurrey, Inorg. Tech. Director
Sandra Biezugbe, Lab Tech.
Sara Molina, Lab Tech.

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Derek Robinson
RE Environmental
P.O. Box 13418
Odessa, TX 79764

Order#: G0203093
Project:
Project Name: Rice Operating
Location: H-32-1

Lab ID: 0203093-01
Sample ID: 4 pt. Wall Comp. @ 12'

Test Parameters

| <u>Parameter</u> | <u>Result</u> | <u>Units</u> | <u>Dilution Factor</u> | <u>RL</u> | <u>Method</u> | <u>Date Analyzed</u> | <u>Analyst</u> |
|------------------|---------------|--------------|----------------------------|-----------|---------------|--------------------------|----------------|
| Chloride | 9.85 | mg/kg | 1 | 5.00 | 9253 | 4/18/02 | SB |

Lab ID: 0203093-02
Sample ID: 5 pt Bottom Comp. @ 14'

Test Parameters

| <u>Parameter</u> | <u>Result</u> | <u>Units</u> | <u>Dilution Factor</u> | <u>RL</u> | <u>Method</u> | <u>Date Analyzed</u> | <u>Analyst</u> |
|------------------|---------------|--------------|----------------------------|-----------|---------------|--------------------------|----------------|
| Chloride | 9.85 | mg/kg | 1 | 5.00 | 9253 | 4/18/02 | SB |

Approval: *Raland K Tuttle* 4-22-02
Raland K. Tuttle, Lab Director, QA Officer Date
Celey D. Keene, Org. Tech. Director
Jeanne McMurrey, Inorg. Tech. Director
Sandra Biezugbe, Lab Tech.
Sara Molina, Lab Tech.

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

8015M

Order#: G0203093

| <i>BLANK</i> | SOIL | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
|---------------------|------|------------|------------------|-----------------|----------------|------------------|------|
| TOTAL, C6-C35-mg/kg | | 0001320-02 | | | <10.0 | | |
| <i>MS</i> | SOIL | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
| TOTAL, C6-C35-mg/kg | | 0203090-02 | 0 | 952 | 802 | 84.2% | |
| <i>MSD</i> | SOIL | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
| TOTAL, C6-C35-mg/kg | | 0203090-02 | 802 | 952 | 800 | 84.4% | 0.2% |
| <i>SRM</i> | SOIL | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
| TOTAL, C6-C35-mg/kg | | 0001320-05 | | 1000 | 780 | 78.0% | |

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

8021B/5030 BTEX

Order#: G0203093

| BLANK | | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
|---------------------------------------|--|------------|------------------|-----------------|----------------|------------------|------|
| SOIL | | | | | | | |
| Benzene- $\mu\text{g}/\text{kg}$ | | 0001325-02 | | | <25.0 | | |
| Ethylbenzene- $\mu\text{g}/\text{kg}$ | | 0001325-02 | | | <25.0 | | |
| Toluene- $\mu\text{g}/\text{kg}$ | | 0001325-02 | | | <25.0 | | |
| p/m-Xylene- $\mu\text{g}/\text{kg}$ | | 0001325-02 | | | <25.0 | | |
| o-Xylene- $\mu\text{g}/\text{kg}$ | | 0001325-02 | | | <25.0 | | |
| MS | | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
| SOIL | | | | | | | |
| Benzene- $\mu\text{g}/\text{kg}$ | | 0203093-02 | 0 | 100 | 102 | 102.0% | |
| Ethylbenzene- $\mu\text{g}/\text{kg}$ | | 0203093-02 | 0 | 100 | 104 | 104.0% | |
| Toluene- $\mu\text{g}/\text{kg}$ | | 0203093-02 | 0 | 100 | 104 | 104.0% | |
| p/m-Xylene- $\mu\text{g}/\text{kg}$ | | 0203093-02 | 0 | 200 | 214 | 107.0% | |
| o-Xylene- $\mu\text{g}/\text{kg}$ | | 0203093-02 | 0 | 100 | 103 | 103.0% | |
| MSD | | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
| SOIL | | | | | | | |
| Benzene- $\mu\text{g}/\text{kg}$ | | 0203093-02 | 0 | 100 | 102 | 102.0% | 0.0% |
| Ethylbenzene- $\mu\text{g}/\text{kg}$ | | 0203093-02 | 0 | 100 | 105 | 105.0% | 1.0% |
| Toluene- $\mu\text{g}/\text{kg}$ | | 0203093-02 | 0 | 100 | 104 | 104.0% | 0.0% |
| p/m-Xylene- $\mu\text{g}/\text{kg}$ | | 0203093-02 | 0 | 200 | 214 | 107.0% | 0.0% |
| o-Xylene- $\mu\text{g}/\text{kg}$ | | 0203093-02 | 0 | 100 | 103 | 103.0% | 0.0% |
| SRM | | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
| SOIL | | | | | | | |
| Benzene- $\mu\text{g}/\text{kg}$ | | 0001325-05 | | 100 | 99.1 | 99.1% | |
| Ethylbenzene- $\mu\text{g}/\text{kg}$ | | 0001325-05 | | 100 | 104 | 104.0% | |
| Toluene- $\mu\text{g}/\text{kg}$ | | 0001325-05 | | 100 | 106 | 106.0% | |
| p/m-Xylene- $\mu\text{g}/\text{kg}$ | | 0001325-05 | | 200 | 216 | 108.0% | |
| o-Xylene- $\mu\text{g}/\text{kg}$ | | 0001325-05 | | 100 | 104 | 104.0% | |

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

Test Parameters

Order#: G0203093

| <i>BLANK</i> | SOIL | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
|---------------------|------|------------|------------------|-----------------|----------------|------------------|------|
| Chloride-mg/kg | | 0001324-01 | | | <5.00 | | |
| <i>MS</i> | SOIL | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
| Chloride-mg/kg | | 0203093-01 | 9.85 | 556 | 571 | 100.7% | |
| <i>MSD</i> | SOIL | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
| Chloride-mg/kg | | 0203093-01 | 9.85 | 556 | 571 | 100.7% | 0.0% |
| <i>SRM</i> | SOIL | LAB-ID # | Sample Concentr. | Spike Concentr. | QC Test Result | Pct (%) Recovery | RPD |
| Chloride-mg/kg | | 0001324-04 | | 5000 | 5050 | 101.0% | |

C & C LANDFARM, INC.

BOX 55

MONUMENT, NEW MEXICO 88265

PHONE: (505) 397-2045

(505) 397-2860

(505) 392-2236

10⁸⁰

002065

COMPANY NAME RICE Operating Company

COMPANY REPRESENTATIVE NAME Donnie Anderson

LEASE NAME SEC BOX H-32-1

| SEC. | TOWNSHIP | RANGE |
|------|----------|------------|
| 32 | 205 | 34E 36E |

TRUCKING COMPANY NAME RE Environmental

DRIVERS SIGNATURE [Signature]

TYPE OF MATERIAL BEING HAULED AND QUANTITY

o/d NON-HAZ (96 yd³)

COPY OF ANALYSIS ATTACHED, IF REQUIRED

TPHC _____

BENZENE _____

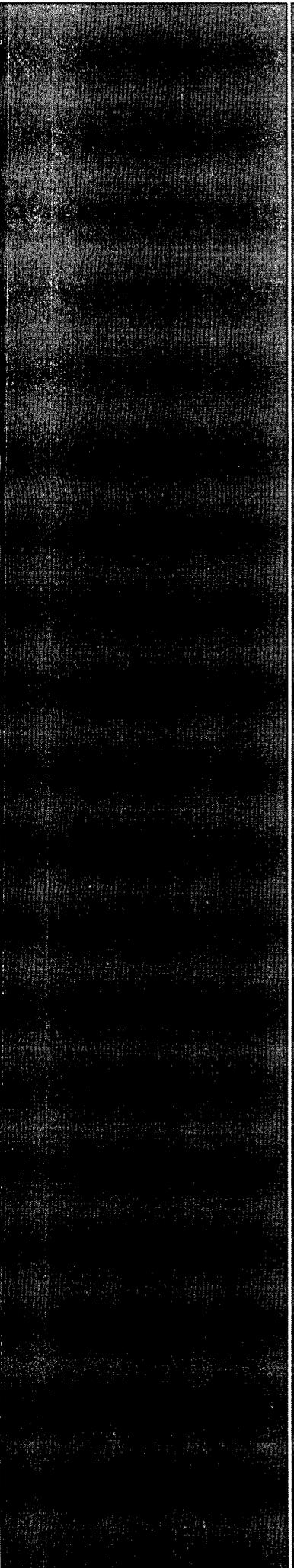
TOLUENE _____

ETHYL BENZENE _____

PARA XYLENE _____

ATTENDANT ON DUTY [Signature]

DATE 4-25-002



Current Photodocumentation

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

EME H-32-1

UL/H, Section 32, T19S, R37E



Facing south

2/18/2013



Facing east

2/18/2013