

1R - 427-339

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, April 09, 2013 3:56 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 (1R427-339) Termination - ROC EME Jct E-33-1 Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct E-33-1 Site
Unit Letter E, Section 33, T19S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-339) 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 27, 2013 (received April 1, 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 (1R427-339) 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

2011 APR -1 P 2:00

CERTIFIED MAIL
RETURN RECEIPT NO. 7007 2560 0000 4569 9613

March 27, 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. E-33-1 (1R427-339): UL/E, Sec. 33, 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 E-33-1 junction box. The site is located in UL/E, Sec. 33, T19S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 31 +/- feet. After the junction box was eliminated, a boring was installed to investigate the depth of chloride presence due to the inability to excavate through the rock formation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in low concentrations of each. The 8 ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 112 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The boring was plugged in total with bentonite. A junction box is no longer needed at the site. The site is adjacent to an active right of way. Vegetation is occurring naturally and is expected to return to a productive capacity at a normal rate.

The junction box site location map, final report, photodocumentation, soil bore log, 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.

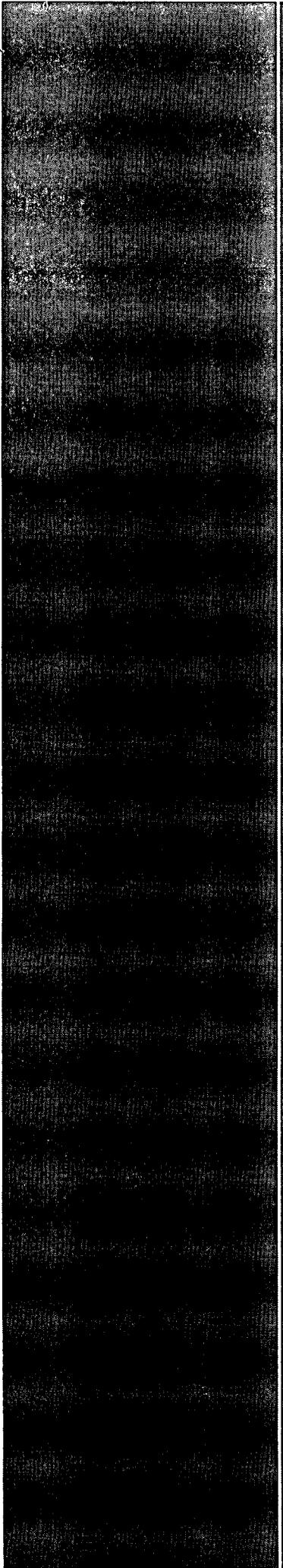
Please contact me at (575)393-9174 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,
RICE Operating Company

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

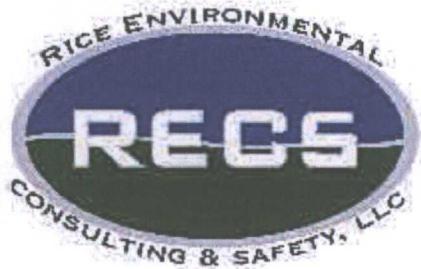
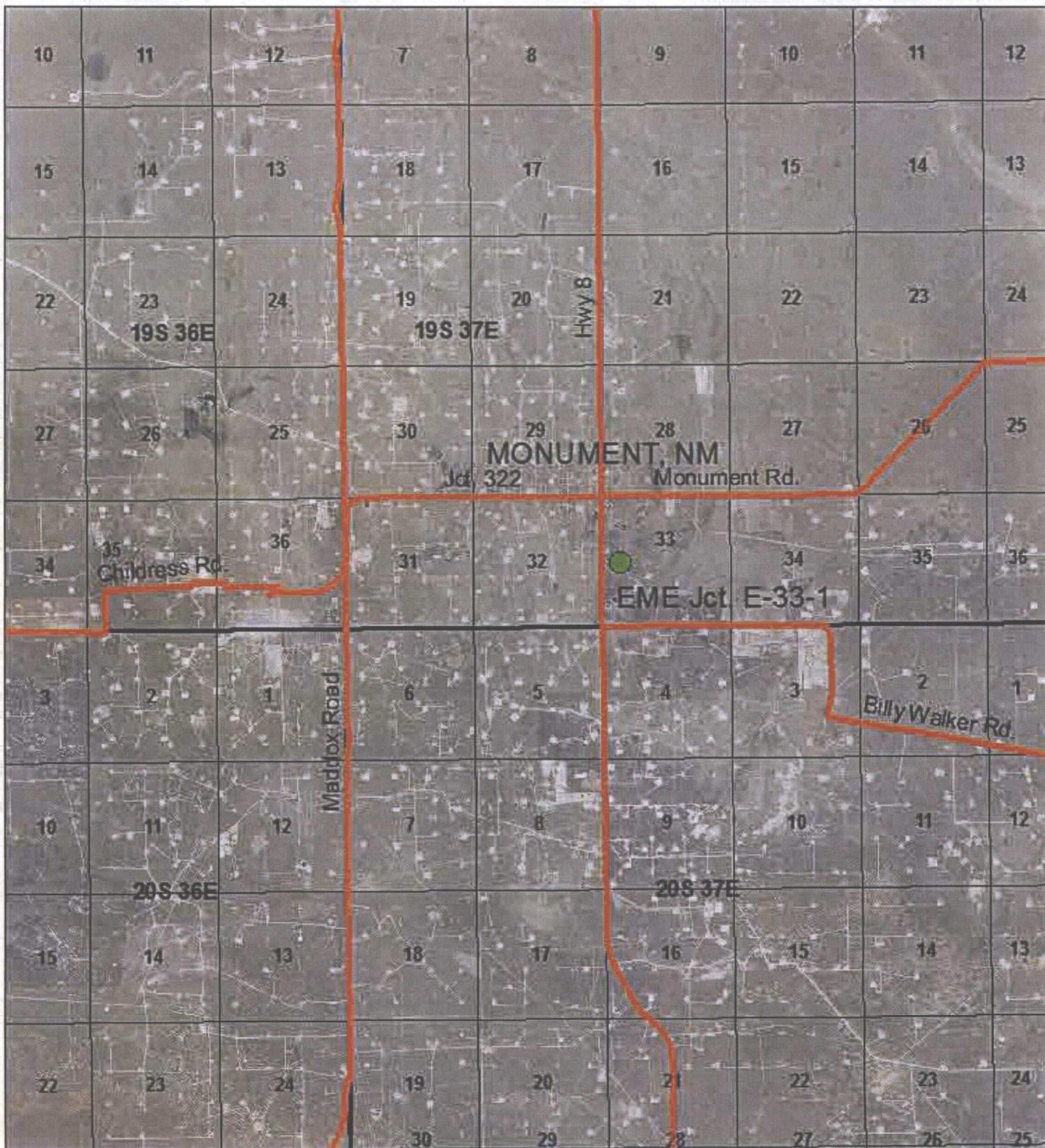
Hack Conder
Environmental Manager

enclosures



Site Location Map

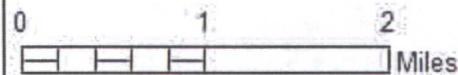
RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471



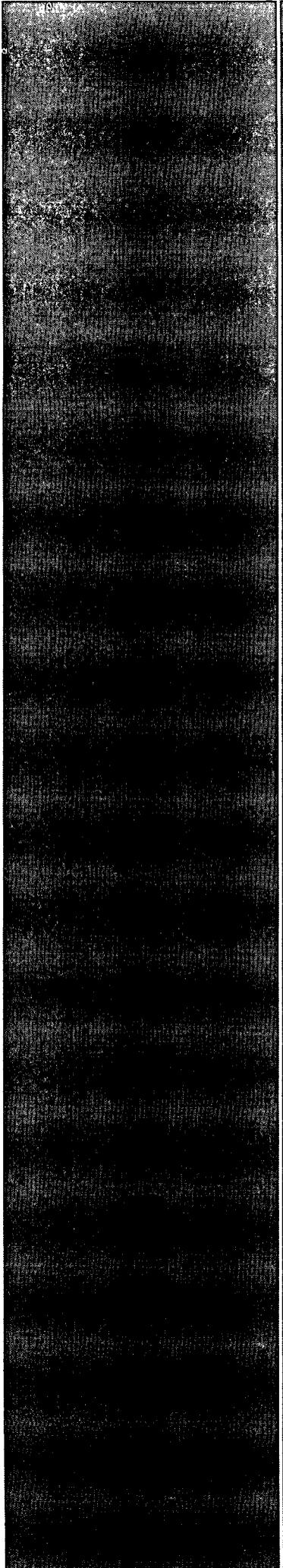
EME Jct. E-33-1

Unit Letter E, Section 33,
T19S, R37E
Lea County, NM

NMOCD Case #: 1R427-339



Drawing date: 3/26/13



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
Eunice Monument Eumont (EME)	Jct. E-33-1	E	33	19S	37E	Lea	Eliminated		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER Joe Ray Williams OTHER _____

Depth to Groundwater 31 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 7/26/2010 Date Completed 7/26/2010 OCD Witness no

Soil Excavated 0.0 cubic yards Excavation Length 0 Width 0 Depth 0 feet

Soil Disposed 0 cubic yards Offsite Facility n/a Location n/a

FINAL ANALYTICAL RESULTS: Sample Date 7/26/2010 Sample Depth 8 ft

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
Source @ 8'	0.9	<10.0	<10.0	112

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
Soil bore at former junction box (source)	1'	143
	2'	213
	3'	174
	4'	136
	5'	185
	6'	146
	7'	157
	8'	138

General Description of Remedial Action: This junction was eliminated during the pipeline replacement/upgrade program. After the junction box was removed, an investigation conducted with a soil bore due to the inability to excavate through the rock formation. Chloride field test were performed on each sample taken at regular intervals, which yielded low concentrations. Organic vapors were measured using a PID, which yielded low concentrations. The deepest sample, 8 ft BGS, was sent to a commercial laboratory for analysis of chloride and TPH, which confirmed low concentrations of each. The entire bore hole was plugged with bentonite to ground surface. The site was not seeded due to the vegetation at the location was intact.

enclosures: photos, soil bore log, 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 Jordan Woodfin SIGNATURE Jordan Woodfin 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 3-23-11

EME Jct. E-33-1

Unit E, Section 33, T19S, R37E



Drilling Soil bore

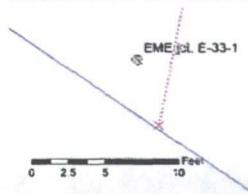
7/26/2010



Soil Bore plugged with bentonite

7/26/2010

Logger:	Lara Weinheimer
Driller:	Harrison & Cooper
Consultant:	RECS
Drilling Method:	Air Rotary
Start Date:	7/26/2010
End Date:	7/26/2010



Project Name: EME jct. E-33-1 Well ID: SB-1
 Location: UL/E sec. 33 T19S R37E
 Lat: N 32°37'0.407" County: Lea
 Long: W 103°15'52.78" State: NM

Comments: All samples from cuttings. Located at source of the former junction box site.
 Drafted by: Lara Weinheimer
 TD = 8 ft Estimated depth to GW = 31 ft

Depth (feet)	chloride field tests	LAB	PID	Description	Lithology	Well Construction
1 ft	143		1.8	Dark brown very fine sand with caliche. Dry. No odor		
2 ft	213		1.7			
3 ft	174		1.9	Tan to black caliche and chert. Dry. Slight hydrocarbon odor		
4 ft	136		3.5			
5 ft	185		1.3			
6 ft	146		2.6			
7 ft	157		1.3			
8 ft	138	CL-112	0.9			
		GRO < 10				
		DRO < 10				

COPY



**ARDINAL
LABORATORIES**

PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

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

Receiving Date: 07/27/10
Reporting Date: 07/28/10
Project Number: NOT GIVEN
Project Name: EME JCT. E-33-1
Project Location: EME JCT. E-33-1

Sampling Date: 07/26/10
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: JH
Analyzed By: AB/HM

	GRO	DRO	
	(C ₆ -C ₁₀)	(>C ₁₀ -C ₂₈)	Cl*
LAB NUMBER SAMPLE ID	(mg/kg)	(mg/kg)	(mg/kg)

ANALYSIS DATE	07/28/10	07/28/10	07/27/10
H20423-1** SOURCE GRAB @ 8'	<10.0	<10.0	112
Quality Control	459	451	520
True Value QC	500	500	500
% Recovery	91.8	90.2	104
Relative Percent Difference	1.2	0.5	3.6

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; Cl: Std. Methods 4500-ClB

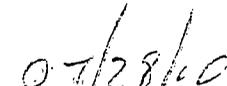
*Analyses performed on 1:4 w:v aqueous extracts.

Reported on wet weight.

**One or more TPH surrogates outside historical limits due to matrix interference.



Chemist



Date

COPY

H20423 TCL RICE

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 client for 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 thirty (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. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: Rice Operating Company				BILL TO				ANALYSIS REQUEST																			
Project Manager: Hack Conder				P.O. #:				Chlorides TPH 8015 M BTEX Texas TPH Complete Cations/Anions TDS																			
Address: 122 West Taylor				Company:																							
City: Hobbs State: NM Zip: 88240				Attn:																							
Phone #: 393-9174 Fax #: 397-1471				Address:																							
Project #: Project Owner:				City:																							
Project Name: EME jct. E-33-1				State: Zip:																							
Project Location: EME jct E-33-1				Phone #:																							
Sampler Name: L. Weinheimer				Fax #:																							
FOR LAB USE ONLY																											
Lab I.D.		Sample I.D.		# CONTAINERS		MATRIX												PRESERV.		SAMPLING							
						GROUNDWATER WASTEWATER SOIL OIL SLUDGE OTHER:		ACID/BASE: ICE / COOL OTHER:		DATE TIME																	
H20423-1		source grab @ 8'		1				✓		7-26-10 12:47																	
										COPY																	

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>L. Weinheimer</i>	Date: 7-26-10 Time: 5:02	Received By: <i>[Signature]</i>	Phone Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Phone #:
Relinquished By: <i>[Signature]</i>	Date: 7/27/10 Time: 4:55	Received By: <i>[Signature]</i>	Fax Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Fax #:
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	Sample Condition Cool Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> No <input type="checkbox"/> No	CHECKED BY: (Initials) <i>[Signature]</i>	REMARKS: email: results Hconder@riceswd.com; kjones@riceswd.com Lweinheimer@rice-ecs.com	

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

RUSH

#26

RICE OPERATING COMPANY

122 West Taylor ~ Hobbs, NM 88240

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

PID METER CALIBRATION & FIELD REPORT FORM

CK
MODEL
NO.

✓

MODEL: PGM 7300 SERIAL NO: 590-000183 *7*
 MODEL: PGM 7300 SERIAL NO: 590-000504 *508*
 MODEL: PGM 7600 SERIAL NO: 110-12383
 MODEL: PGM 7600 SERIAL NO: 110-02920

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: <i>930137</i>	EXPIRATION DATE: <i>4-28-13</i>
FILL DATE: <i> </i>	METER READING ACCURACY: <i>100%</i>

ACCURACY: +/- 2%

SYSTEM	SITE	UNIT	SECTION	TOWNSHIP	RANGE
<i>EME</i>	<i>Jet E-33-1</i>	<i>E</i>	<i>33</i>	<i>T19S</i>	<i>R37E</i>

SAMPLE ID: *Soil core #1*

DEPTH	PID
<i>1'</i>	<i>1.8</i>
<i>2'</i>	<i>1.7</i>
<i>3'</i>	<i>1.9</i>
<i>4'</i>	<i>3.5</i>
<i>5'</i>	<i>1.3</i>
<i>6'</i>	<i>2.6</i>
<i>7'</i>	<i>1.3</i>
<i>8'</i>	<i>0.9</i>

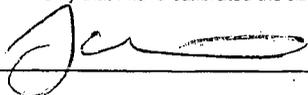
DEPTH	PID

DEPTH	PID

DEPTH	PID

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

Signature



Date

7-26-10

SITE MAP



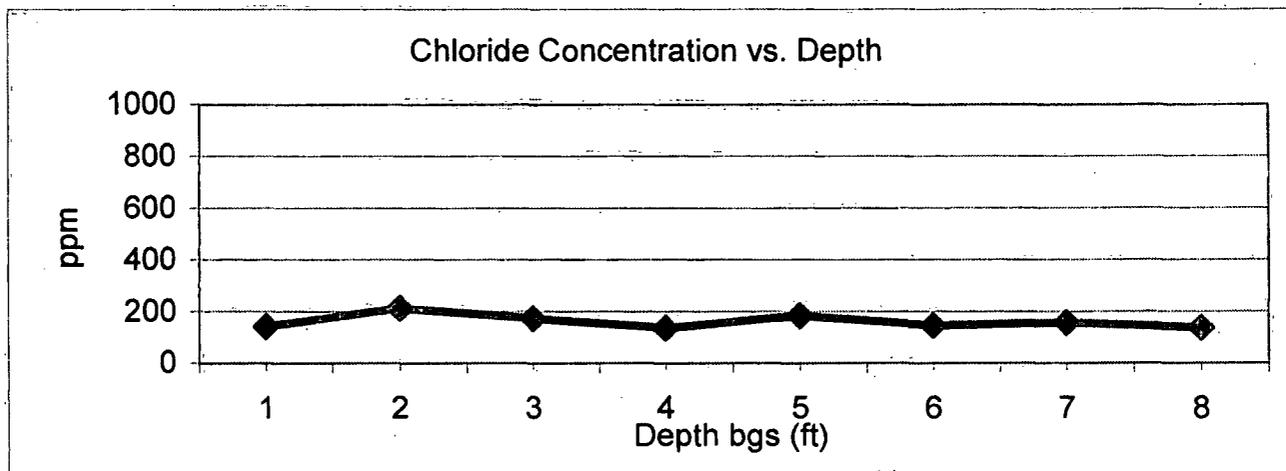
COPY

EME Jct. E-33-1

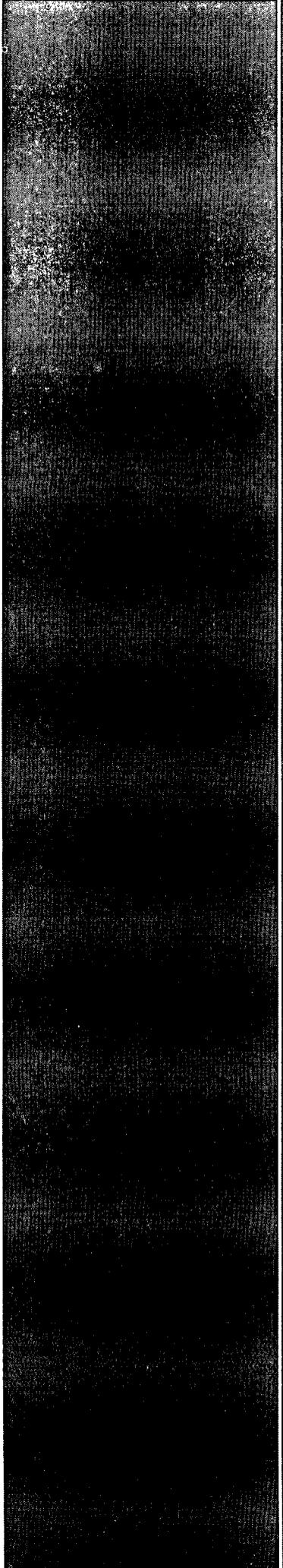
Unit 'E', Sec. 33, T19S, R37E

Soil Bore at junction (source)

Depth bgs (ft)	[Cl] ppm
1	143
2	213
3	174
4	136
5	185
6	146
7	157
8	138



Groundwater = 31 ft.



Current Photodocumentation

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

EME Jct. E-33-1
UL/E, Section 33, T19S, R37E



02/13/2013

Facing north

2/13/2013



02/13/2013

Facing east

2/13/2013