

1R - 427-126

# APPROVALS

YEAR(S):

2013

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**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Wednesday, April 10, 2013 11:33 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 (1R427-126) Termination - ROC EME F-20 Site

**RE: Termination Request  
for the Rice Operating Company's  
EME F-20 Site  
Unit Letter F, Section 20, T21S, R36E, NMPM, Lea County, New Mexico  
Remediation Plan (1R427-126) 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 (1R427-126) 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 2:00

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 9316

**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 F-20 (1R427-126): UL/F, Sec. 20, T21S, 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 2000, ROC initiated work on the former F-20 junction box. The site is located in UL/F, Sec. 20, T21S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 210 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 10x10x8 ft deep excavation. Each sample was field titrated for chlorides, resulting in low chloride concentrations. Representative samples were collected from the excavation sidewalls and bottom and sent to a commercial laboratory for analysis. The sidewalls sample resulted in a chloride concentration of 214 mg/kg, a gasoline range organics (GRO) concentration of 118 mg/kg and a diesel range organics (DRO) concentration of 2,480 mg/kg. The bottom composite sample resulted in a chloride concentration of 427 mg/kg, a GRO concentration below detectable limits and a DRO concentration of 1,460 mg/kg. Both samples were analyzed for BTEX, resulting in below detectable limits throughout. A total for 12 cubic yards of excavated soil was properly disposed of at a NMOCD facility. A new, watertight junction was installed over the site, which is located next to a lease road; therefore, seeding is not required.

The junction box site location map, final report, laboratory analysis, disposal manifests 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.

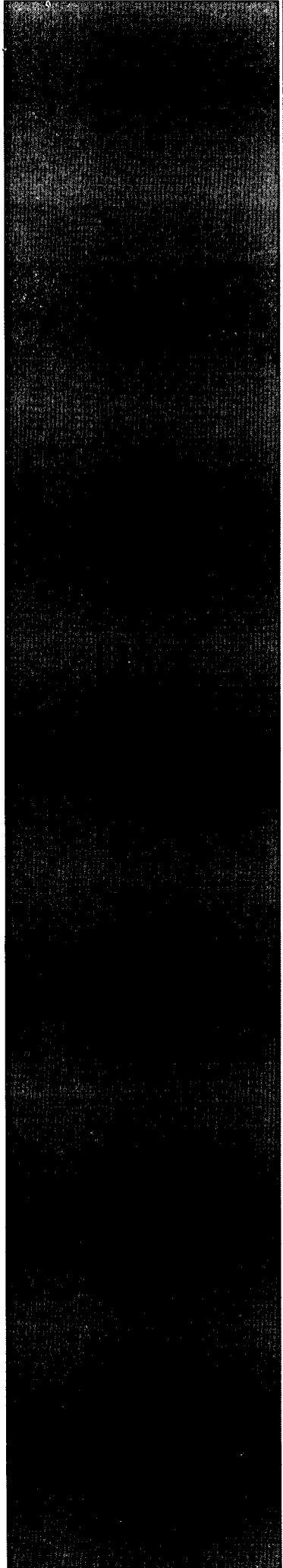
Please contact me at (575)393-9174 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,  
RICE Operating Company

A handwritten signature in black ink, appearing to read "H. Conder", with a long, sweeping horizontal stroke at the end.

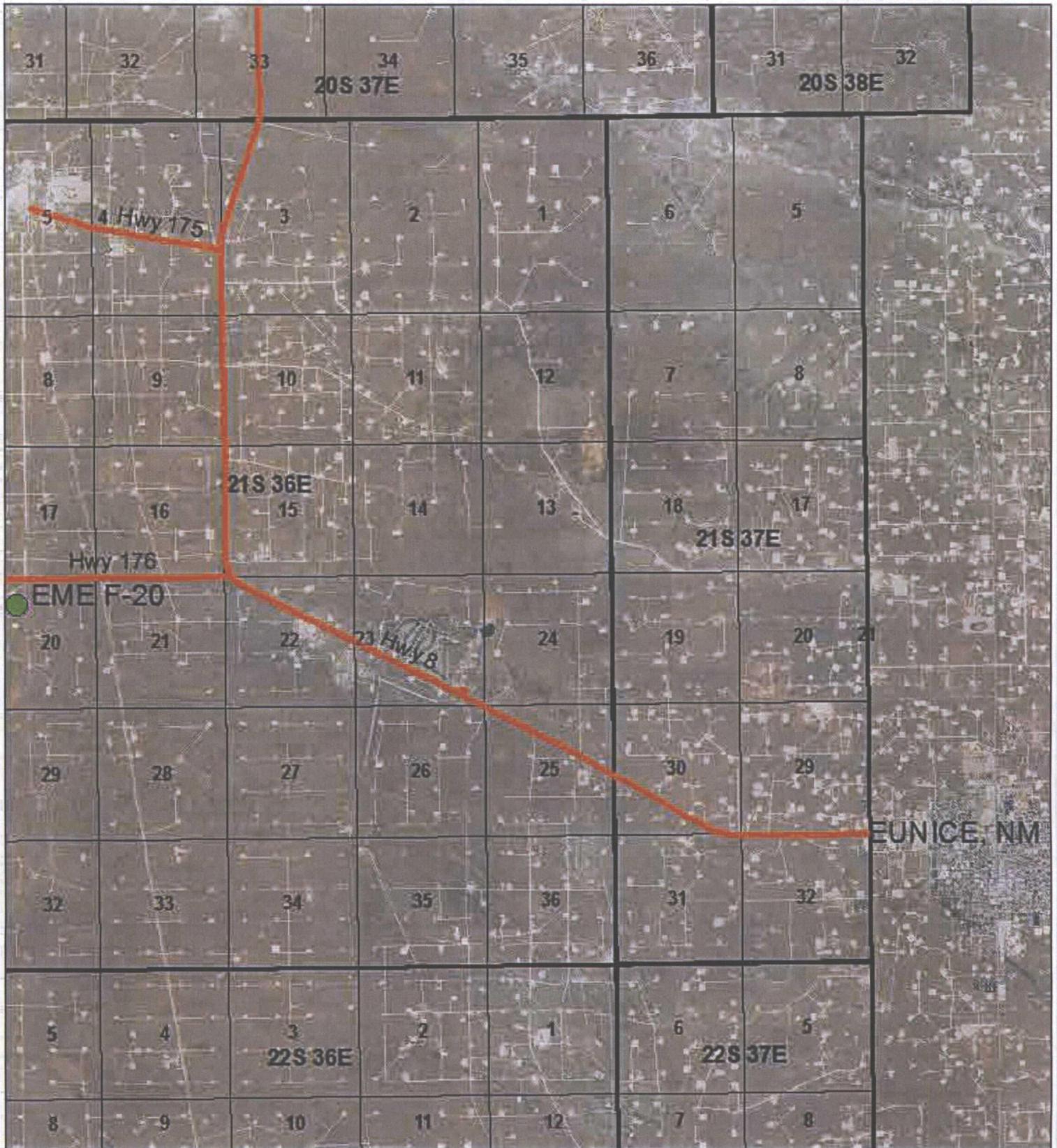
Hack Conder  
Environmental Manager

enclosures



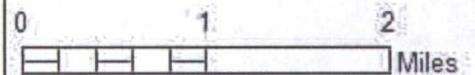
# Site Location Map

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

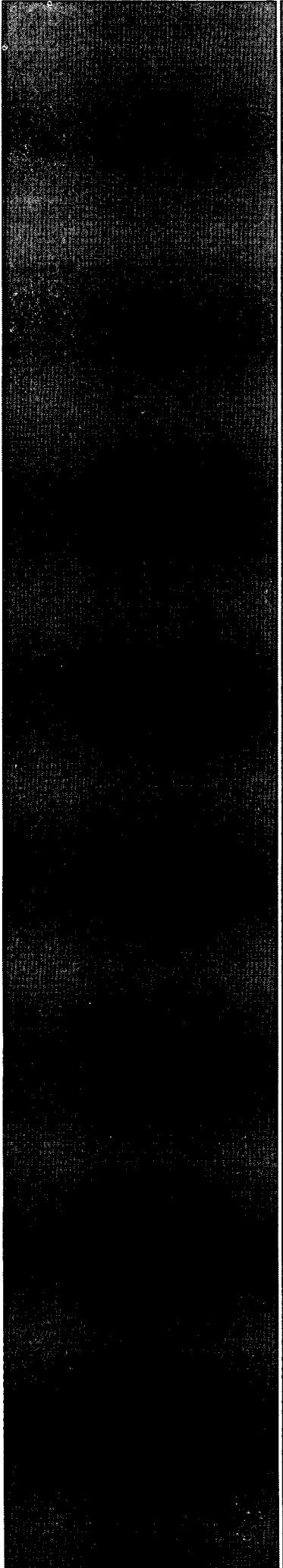


**EME F-20  
(1R427-126)**

Unit Letter F, Section 20  
T21S, R36E  
Lea County, NM



Drawing date: 3/19/13  
Drafted by: Traci Jennings



# Junction Box Report

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





PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR  
 RICE OPERATING CO.  
 ATTN: JAMES STURGILL  
 122 W. TAYLOR  
 HOBBS, NM 88240  
 FAX TO:

Receiving Date: 10/31/00  
 Reporting Date: 11/01/00  
 Project Number: F-20 EME (RICE)  
 Project Name: F-20 BOTTOM EME  
 Project Location: F-20; SEC20-T21S-R36E

Sampling Date: 10/31/00  
 Sample Type: SOIL  
 Sample Condition: COOL & INTACT  
 Sample Received By: GP  
 Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	GRO (C <sub>6</sub> -C <sub>10</sub> ) (mg/Kg)	DRO (>C <sub>10</sub> -C <sub>28</sub> ) (mg/Kg)	CI* (mg/Kg)
ANALYSIS DATE		10/31/00	10/31/00	11/01/00
H5297-1	F-20 BOTTOM EME	<50	1460	427
H5297-2	F-20 SIDES EME	118	2480	214
Quality Control		938	855	982
True Value QC		1000	1000	1000
% Recovery		93.8	85.5	98.2
Relative Percent Difference		11.0	0.3	2.9

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI: Std. Methods 4500-CI-B  
 \*Analyses performed on 1:4 w:v aqueous extracts

*James Sturgill*  
 Chemist

11/1/00  
 Date

H5297A.XLS

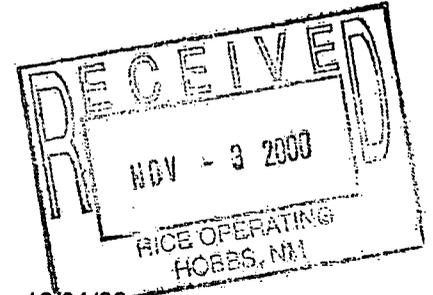
PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived 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.



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ANALYTICAL RESULTS FOR  
 RICE OPERATING CO.  
 ATTN: JAMES STURGILL  
 122 W. TAYLOR  
 HOBBS, NM 88240  
 FAX TO:



Receiving Date: 10/31/00  
 Reporting Date: 11/01/00  
 Project Number: F-20 EME (RICE)  
 Project Name: F-20 BOTTOM EME  
 Project Location: F-20; SEC20-T21S-R36E

Sampling Date: 10/31/00  
 Sample Type: SOIL  
 Sample Condition: COOL & INTACT  
 Sample Received By: GP  
 Analyzed By: BC

LAB NO.	SAMPLE ID	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE		11/01/00	11/01/00	11/01/00	11/01/00
H5297-1	F-20 BOTTOM EME	<0.005	<0.005	<0.005	<0.015
H5297-2	F-20 SIDES EME	<0.005	<0.005	<0.005	<0.015
Quality Control		0.100	0.103	0.107	0.318
True Value QC		0.100	0.100	0.100	0.300
% Recovery		100	103	107	106
Relative Percent Difference		9.9	8.4	14.1	12.5

METHOD: EPA SW-846 8260

*Burgess J. Cochran*  
 Chemist

*11/1/00*  
 Date

H5297B.XLS

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 ATTN: JIM STURGILL  
 122 W. TAYLOR  
 HOBBS, NM 88240  
 FAX TO:

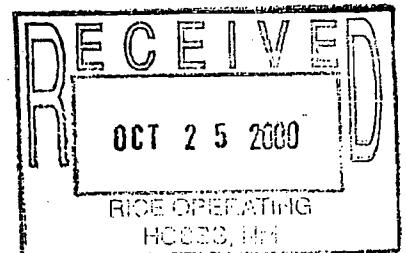
Receiving Date: 10/18/00  
 Reporting Date: 10/19/00  
 Project Number: NOT GIVEN  
 Project Name: NOT GIVEN  
 Project Location: SEC 20-T22S-R36E

Sampling Date: 10/18/00  
 Sample Type: SOIL  
 Sample Condition: COOL & INTACT  
 Sample Received By: GP  
 Analyzed By: BC/AH

LAB NUMBER SAMPLE ID	GRO (C <sub>6</sub> -C <sub>10</sub> ) (mg/Kg)	DRO (>C <sub>10</sub> -C <sub>28</sub> ) (mg/Kg)	Cl* (mg/Kg)
ANALYSIS DATE	10/18/00	10/18/00	10/19/00
H5268-1 F-20 EME SIDE	<50	2390	320
H5268-2 F-20 EME BOTTOM	54.1	3520	442
Quality Control	1050	1020	1039
True Value QC	1000	1000	1000
% Recovery	105	102	104
Relative Percent Difference	3.7	1.6	1.3

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

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



*Bryant A. Cook*  
 Chemist

10/19/00  
 Date

H5268A.XLS

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**ARDINAL  
LABORATORIES**

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

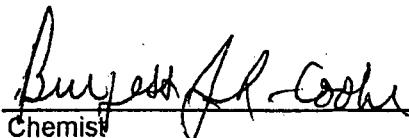
ANALYTICAL RESULTS FOR  
RICE OPERATING CO.  
ATTN: JIM STURGILL  
122 W. TAYLOR  
HOBBS, NM 88240  
FAX TO:

Receiving Date: 10/18/00  
Reporting Date: 10/19/00  
Project Number: NOT GIVEN  
Project Name: NOT GIVEN  
Project Location: SEC 20-T22S-R36E

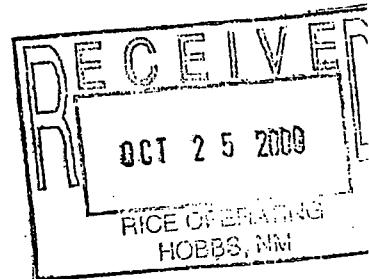
Sampling Date: 10/18/00  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: GP  
Analyzed By: BC

LAB NO.	SAMPLE ID	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE		10/19/00	10/19/00	10/19/00	10/19/00
H5268-1	F-20 EME SIDE	0.011	0.030	0.006	0.017
H5268-2	F-20 EME BOTTOM	0.005	0.028	0.011	0.036
Quality Control		0.089	0.092	0.090	0.273
True Value QC		0.100	0.100	0.100	0.300
% Recovery		89.0	92.4	90.4	91.1
Relative Percent Difference		1.9	2.1	1.9	1.8

METHOD: EPA SW-846 8260

  
Chemist

10/19/00  
Date



H5268B.XLS

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# CARDINAL LABORATORIES, INC.

2111 Beechwood, Abilene, TX 79603 101 East Marland, Hobbs, NM 88240

(915) 673-7001 Fax (915) 673-7020 (505) 393-2326 Fax (505) 393-2476

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page \_\_\_\_ of \_\_\_\_

Company Name: <u>Rice Operating</u>		<b>BILL TO</b>		<b>ANALYSIS REQUEST</b>											
Project Manager: <u>Jim Stuegill</u>		P.O. #:													
Address: <u>122 W TAYLOR</u>		Company: <u>RICE</u>													
City: <u>Hobbs</u> State: <u>NM</u> Zip: <u>88240</u>		Attn:													
Phone #: <u>3939174</u> Fax #:		Address:													
Project #: _____ Project Owner:		City:													
Project Name:		State: _____ Zip: _____													
Project Location: <u>Sec 20 - T22S - R36E</u>		Phone #:													
Sampler Name:		Fax #:													

FOR LAB USE ONLY		(C)RAB OR (C)OMP.	# CONTAINERS	MATRIX						PRESERV.		SAMPLING		DATE	TIME	BTEX	TPH	SIS	M	CL
Lab I.D.	Sample I.D.			GROUNDWATER	WASTEWATER	SOIL	CRUDE OIL	SLUDGE	OTHER:	ACID/BASE:	ICE / COOL	OTHER:								
<u>115268-1</u>	<u>F-20 EME Side</u>		<u>1</u>										<u>10/18</u>	<u>11:30A</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>			
	<u>-2 F-20 EME Bottom</u>		<u>1</u>										<u>✓</u>	<u>✓</u>	<u>✓</u>					

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Terms and Conditions: Interest will be charged on all accounts more than 30 days past due at the rate of 24% per annum from the original date of invoice, and all costs of collections, including attorney's fees.

Sampler Relinquished: <u>James Stuegill</u>		Date: _____	Received By: _____		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
Relinquished By: _____		Time: _____	Received By: (Lab Staff) _____		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Delivered By: (Circle One)		Date: <u>10/18/2000</u>	Time: <u>2:20P</u>		REMARKS:	
Sampler <input checked="" type="radio"/> UPS - <input type="radio"/> Bus - <input type="radio"/> Other:		Sample Condition		CHECKED BY: _____		
		Cool Intact		(Initials)		
		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
		<input type="checkbox"/> No <input type="checkbox"/> Yes				

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

**Sundance Services, Inc.**

P.O. Box 1737 ★ Eunice, NM 88231  
(505) 394-2511

NE 36770

LEASE OPERATOR/SHIPPER/COMPANY: *Hy-Per*

LEASE NAME: *EME # 20* *692*

TRANSPORTER COMPANY: *Diamond* TIME: AM/PM

DATE: *01/18/01* VEHICLE NO.: *11* DRIVER NO.:

CHARGE TO: *Hy-Per*

**TYPE OF MATERIAL**

- Production Water
- Tank Bottoms
- Other Material:
- Drilling Fluids
- Contaminated soil
- BS&W Content: \_\_\_\_\_
- Completion Fluids
- C-117 No.: \_\_\_\_\_

Description: *c/o*

VOLUME OF MATERIAL  BBLs. \_\_\_\_\_ :  YARD *12* :  \_\_\_\_\_

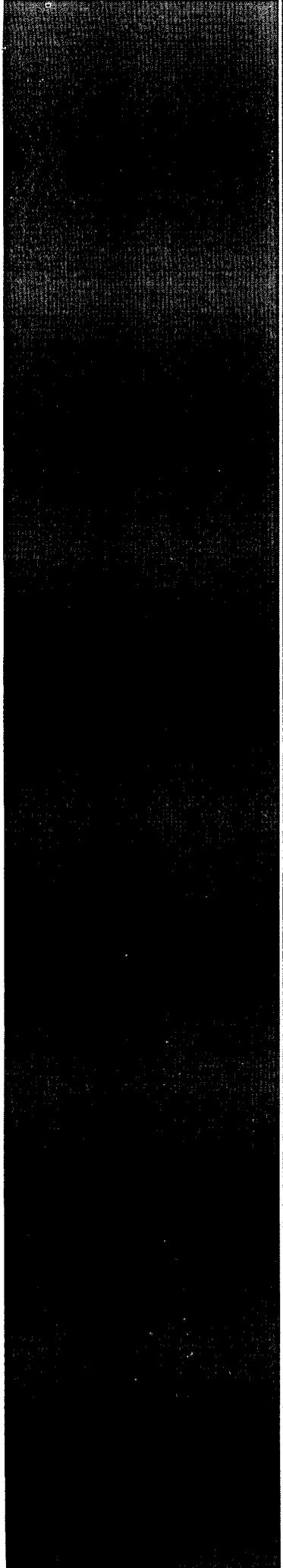
AS A CONDITION TO SUNDANCE SERVICES, INC.'S ACCEPTANCE OF THE MATERIALS SHIPPED WITH THIS JOB TICKET, OPERATOR/SHIPPER REPRESENTS AND WARRANTS THAT THE WASTE MATERIAL SHIPPED HEREWITH IS MATERIAL EXEMPT FROM THE RESOURCE, CONSERVATION AND RECOVERY ACT OF 1976, AS AMENDED FROM TIME TO TIME, 40 U.S.C. § 6901, et seq., THE NM HEALTH AND SAF. CODE § 361.001, et seq., AND REGULATIONS RELATED THERETO, BY VIRTUE OF THE EXEMPTION AFFORDED DRILLING FLUIDS, PRODUCED WATERS, AND OTHER WASTE ASSOCIATED WITH THE EXPLORATION, DEVELOPMENT OR PRODUCTION OF CRUDE OIL OR NATURAL GAS OR GEOTHERMAL ENERGY.

ALSO AS A CONDITION TO SUNDANCE SERVICES, INC.'S ACCEPTANCE OF THE MATERIALS SHIPPED WITH THIS JOB TICKET, TRANSPORTER REPRESENTS AND WARRANTS THAT ONLY THE MATERIAL DELIVERED BY OPERATOR/SHIPPER TO TRANSPORTER IS NOW DELIVERED BY TRANSPORTER TO SUNDANCE SERVICES, INC.'S FACILITY FOR DISPOSAL.

*THIS WILL CERTIFY that the above Transporter loaded the material represented by this Transporter Statement at the above described location, and that it was tendered by the above described shipper. This will certify that no additional materials were added to this load, and that the material was delivered without incident.*

DRIVER: *Robert Lewis*  
(SIGNATURE)

FACILITY REPRESENTATIVE: *Thomas Ford*  
(SIGNATURE)



# Current Photodocumentation

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

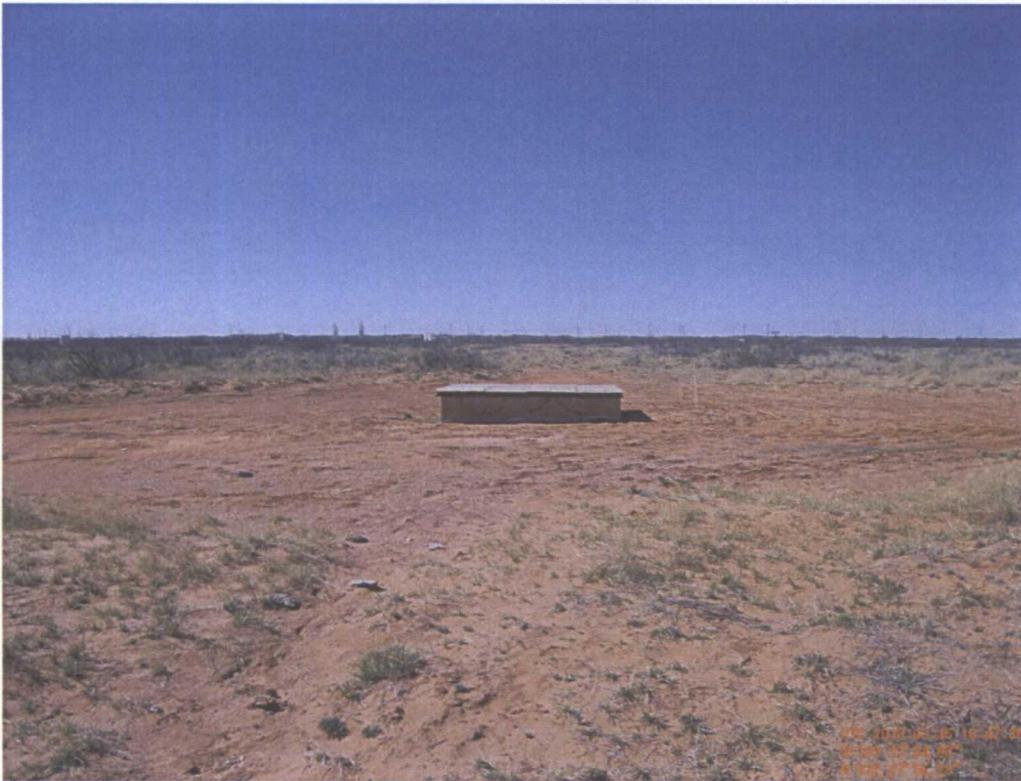
**EME F-20 (1R427-126)**

UL/F, Section 20, T21S, R36E



Facing north

3/15/2013



Facing south

3/15/2013