

1R - 427-308

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, May 02, 2013 1:20 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 (1R427-342) Termination - ROC EME B-10 EOL Site

**RE: Termination Request
for the Rice Operating Company's
EME B-10 EOL Site
Unit Letter B, Section 10, T21S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-342) 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 April 11, 2013 (received April 12, 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 (1R427-342) 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 9347

April 11, 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. B-36 (1R427-308): UL/B, Sec. 36, T20S, R36E
RICE Operating Company – Eunice Monument Eumont SWD System

RECEIVED OGD
2013 APR 12 P 1:22

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 2009, ROC initiated work on the former B-36 junction box. The site is located in UL/B, Sec. 36, T20S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 103 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 25x30x12 ft deep excavation. Each sample was field titrated for chlorides, resulting in chloride concentrations that related 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 288 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 336 mg/kg and concentrations of GRO and DRO below detectable limits. The excavated soil was blended on site and a sample was collected and sent to a commercial laboratory for analysis. The blended backfill samples resulted in a chloride concentration of 160 mg/kg and concentrations of GRO and DRO below detectable limits. The excavated soil was returned to the excavation to ground surface and contoured to the surrounding area. On March 9, 2009, the site was seeded with a blend of native vegetation. Vegetation 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 junction box is no longer necessary at this site.

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

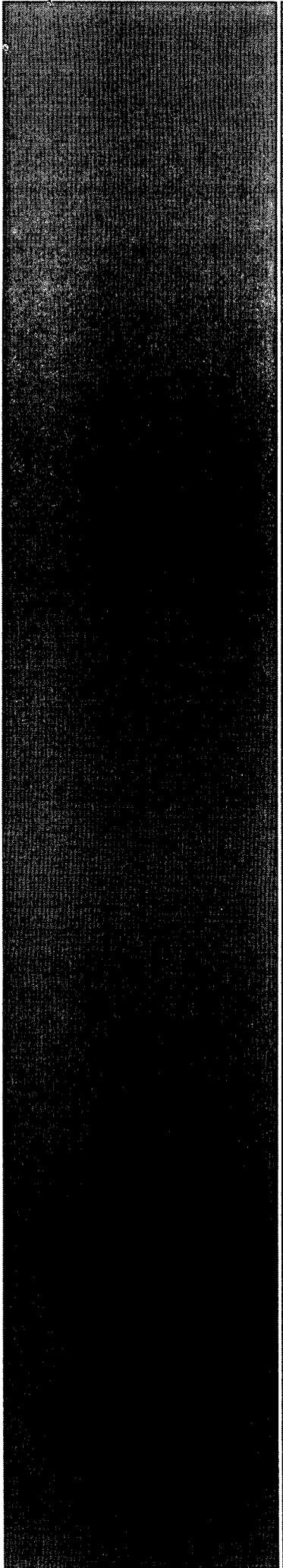
Please contact me at (575)393-9174 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

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

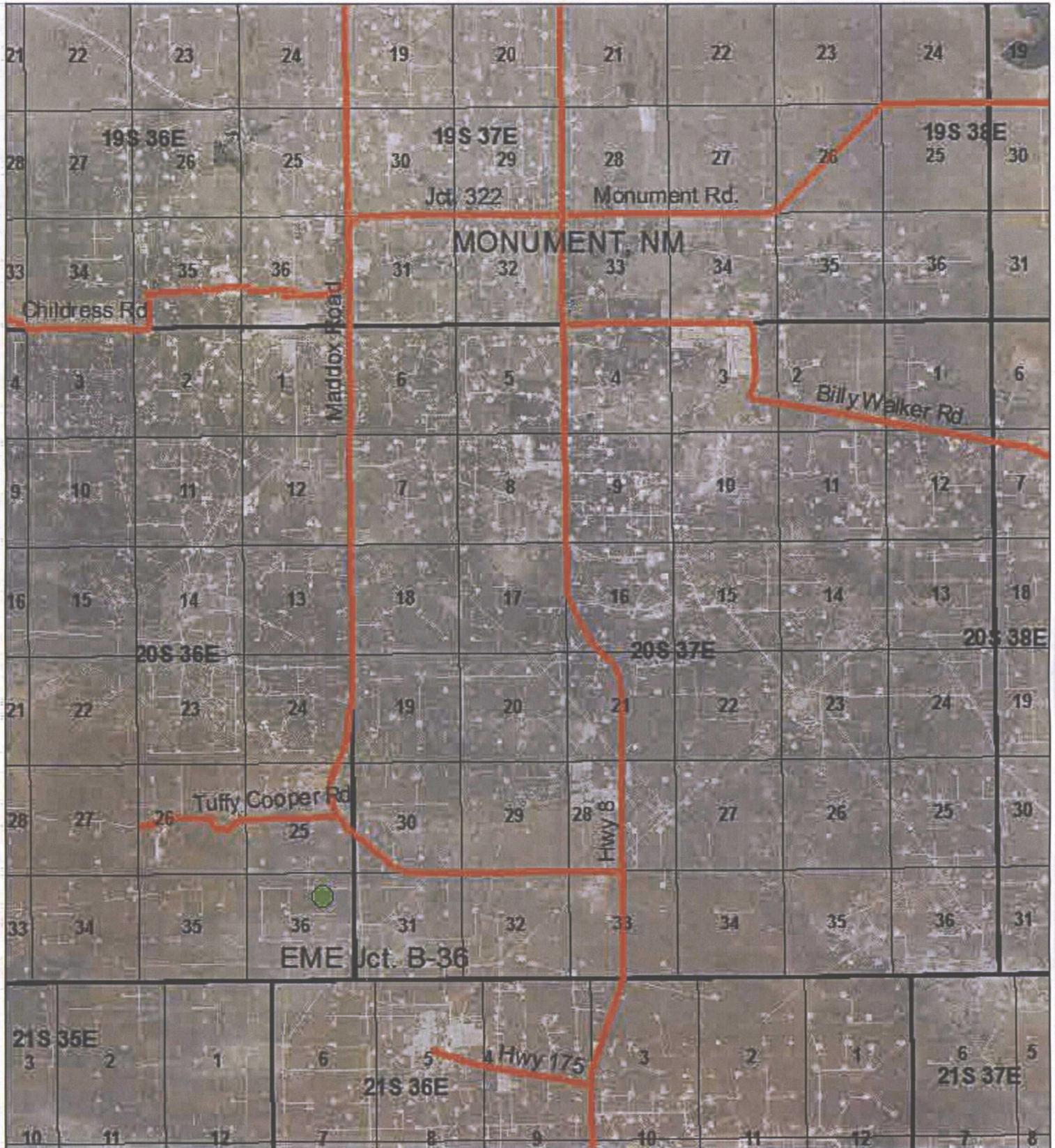
enclosures



Site Location Map

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

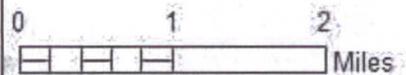
Site Location Map



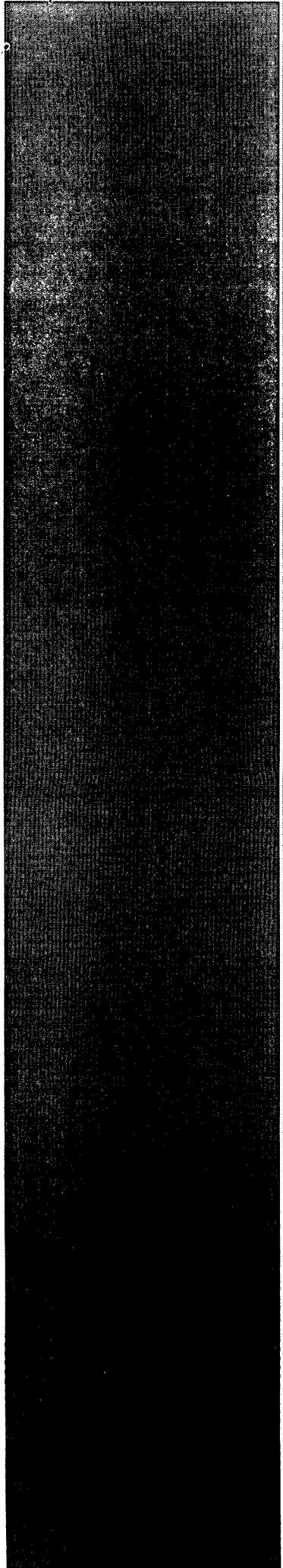
EME Jct. B-36

Unit Letter B, Section 36,
T20S, R36E
Lea County, NM

NMOCD #1R427-308



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. B-36	B	36	20S	36E	Lea	eliminated		

LAND TYPE: BLM _____ STATE X FEE LANDOWNER _____ OTHER _____

Depth to Groundwater 103 feet NMOCD SITE ASSESSMENT RANKING SCORE: _____

Date Started 1/6/2009 Date Completed 3/6/2009 OCD Witness no

Soil Excavated 333.3 cubic yards Excavation Length 25 Width 30 Depth 12 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 3/2/2009 Sample Depth 12 ft

Procure 5-point composite sample of bottom and 4-point composite sample of sidewalls. TPH and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines.

CHLORIDE FIELD TESTS

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
4-WALL COMP.	8.6	<10.0	<10.0	288
BOTTOM COMP.	9.8	<10.0	<10.0	336
BLENDED BACKFILL	3.5	<10.0	<10.0	160

LOCATION	DEPTH	mg/kg
4-wall comp.	n/a	300
bottom comp.	12'	450
blended backfill	n/a	270
background	6"	204
vertical delineation trench at 10 ft west of the junction (source)	1'	147
	2'	144
	3'	145
	4'	142
	5'	151
	6'	303
	7'	268
	8'	361
	9'	405
	10'	404
	11'	384
12'	256	

General Description of Remedial Action: This junction box was eliminated during the pipeline replacement/upgrade program. After the former junction box was removed, an investigation was conducted using a backhoe to collect soil samples at regular intervals producing a 25x30x12-ft deep excavation. Chloride field tests were performed on each sample yielding generally low concentrations similar to that of the background. Organic vapors were measured using a PID which yielded low concentrations. Representative composite samples were sent to a commercial laboratory for analysis of chloride and TPH which confirmed low concentrations of both. The excavated soil was blended on site and returned to the excavation to ground surface and contoured to the surrounding area. On 3/9/2009, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

enclosures: photos, 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: [Signature] COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Katie Jones INITIAL: [Initials]

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE: [Signature] DATE 3-14-09

EME Jct. B-36

Unit B, Section 36, T20S, R36E



site prior to excavation, facing north

1/6/2009



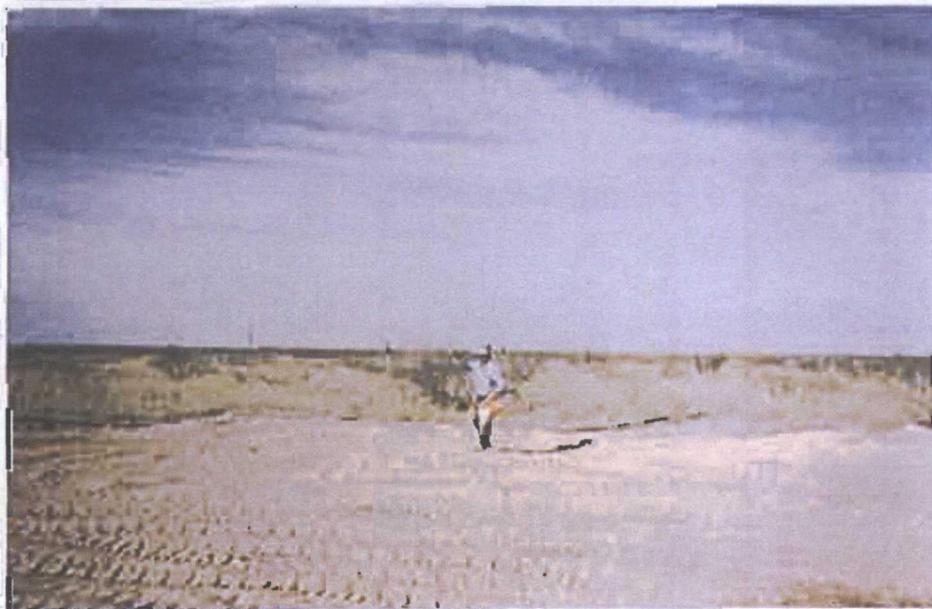
collecting a soil sample, facing southwest

1/6/2009



final 25x30x12-ft excavation, facing southeast

3/6/2009



seeding backfilled site, facing west

3/9/2009



ARDINAL LABORATORIES

PHONE (573) 383-2328 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: ERIC GARRISON
122 W. TAYLOR
HOBBS, NM 88240

Receiving Date: 03/02/09
Reporting Date: 03/03/09
Project Number: NOT GIVEN
Project Name: EME JCT B-36
Project Location: EME JCT B-36

COPY

Sampling Date: 03/02/09
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: HM
Analyzed By: AB/HM

LAB NUMBER	SAMPLE ID	GRO (C ₈ -C ₁₀) (mg/kg)	DRO (C ₁₀ -C ₂₈) (mg/kg)	Cl ⁻ (mg/kg)
	ANALYSIS DATE	03/03/09	03/03/09	03/03/09
H16996-1	5PT BTM COMP @ 12'	<10.0	<10.0	336
H16996-2	4 WALL COMP @ 25' x 30'	<10.0	<10.0	288
H16996-3	BLENDED BACKFILL	<10.0	<10.0	160
	Quality Control	476	546	500
	True Value QC	500	500	500
	% Recovery	95.2	109	100
	Relative Percent Difference	0.6	6.6	< 0.1

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

Cheryl Kane

Chemist

03/04/09

Date

H16996 TOU RICE

PLEASE NOTE: Liability and Damages. Cardinal's liability and every 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 claim 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 customers arising out of or resulting from the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated theories or otherwise. Release released only in the samples submitted. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

CARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240
 (575) 393-2326 Fax (575) 393-2476

Page ___ of ___

Company Name: <u>Site Operating</u>	BILL TO	ANALYSIS REQUEST									
Project Manager: <u>Eric Anderson</u>	P.O. #:	<div style="position: absolute; top: 50%; left: 50%; transform: translate(-50%, -50%); opacity: 0.5; font-size: 4em;">COPY</div>									
Address: <u>172th R. 2nd</u>	Company:										
City: <u>Hobbs</u>	Attn:										
State: <u>NM</u> Zip: <u>88240</u>	Address:										
Phone #: <u>393-7171</u> Fax #: <u>393-2476</u>	City:										
Project #:	State: Zip:										
Project Name: <u>Site NT 13</u>	Phone #:										
Project Location: <u>Site NT 13</u>	Fax #:										
Client Name: <u>Site Operator</u>											

Lab I.D.	Sample I.D.	CONTAINERS	MATRIX					PRESERV.		SAMPLING		DATE	TIME	Y	M
			GROUNDEWATER	WASTEWATER	SOIL	SOIL	SLUDGE	OTHER	ACID/BASE	ICE / COOL	OTHER				
11-1101	Site Operator	1			1				1		3-2-01	9:30	X		
11-1102	Site Operator	1			1				1		3-2-01	11:00	X		
11-1103	Site Operator	1			1				1		3-2-01	11:30	X		

Date: <u>3-2-01</u> Time: <u>11:30</u> Received By: <u>Eric Anderson</u>	Phone Result: <input type="checkbox"/> No Fax Result: <input type="checkbox"/> No Add'l Phone #: _____ Add'l Fax #: _____
Date: _____ Time: _____ Received By: _____	REMARKS: <u>Request</u> <u>Blaker@kiesand.com</u> <u>Purdig@kiesand.com</u>
Delivered By: (Circle One) Sample - URS - Bus - Other: _____ Temp. _____ Sample Condition: Cool <input type="checkbox"/> Intact <input type="checkbox"/> <input type="checkbox"/> Yes <input type="checkbox"/> No	
CHECKED BY: (Initials) <u>BSM</u>	

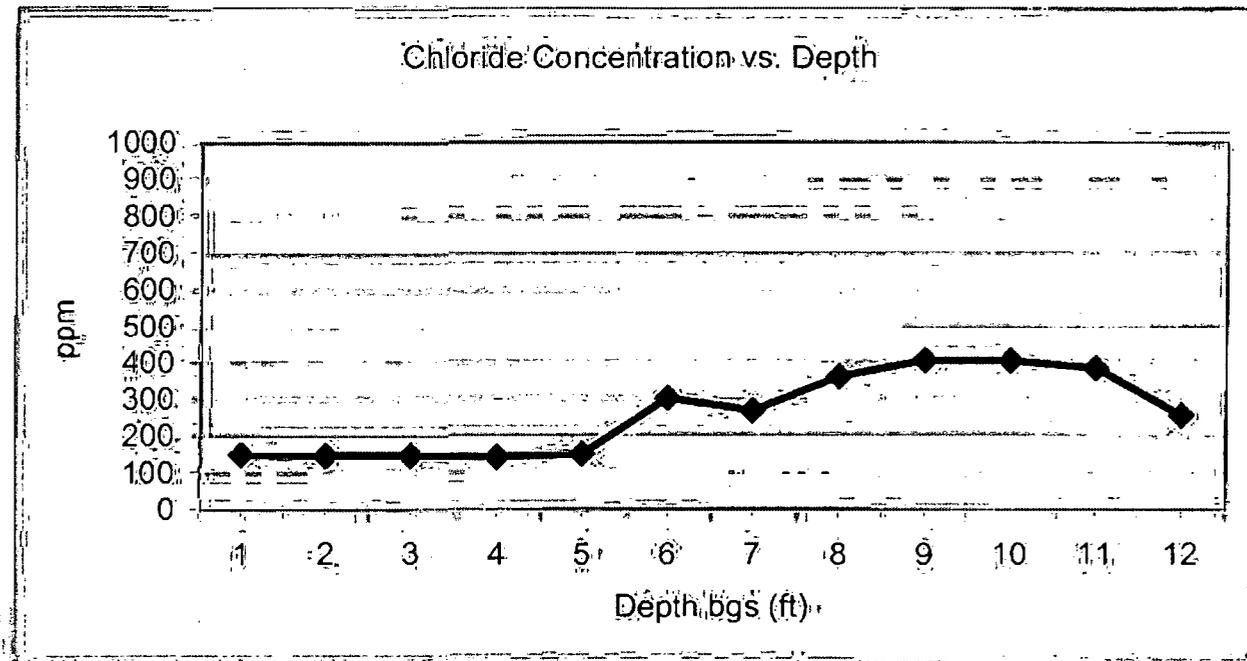
† Cardinal cannot accept verbal changes. Please fax written changes to 575-393-2476.

EME Jct. B-36

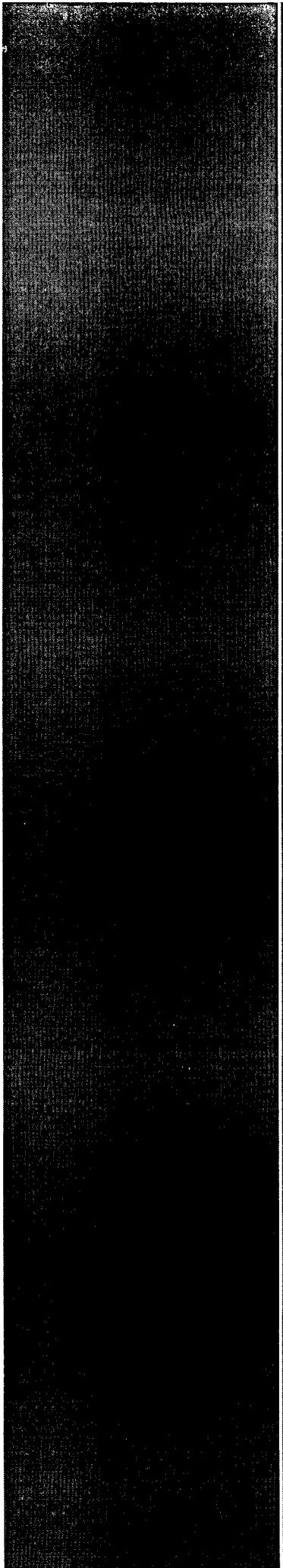
Unit 'B', Sec. 36, T20S, R36E

Backhoe samples at 10 ft west of the junction (source)

Depth bgs (ft)	[Cl ⁻] ppm
1	147
2	144
3	145
4	142
5	151
6	303
7	268
8	361
9	405
10	404
11	384
12	256



Groundwater = 103 ft



Current Photodocumentation

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

EME Jct. B-36

UL/B, Section 36, T20S, R36E



Facing north

2/22/2013



Facing east

2/22/2013