

1R - 427-342

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 B-10 EOL (1R427-342): UL/B, Sec. 10, 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 2010, ROC initiated work on the former B-10 EOL junction box. The site is located in UL/B, Sec. 10, T21S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 200 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x2x10 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 10 ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 96 mg/kg, a concentration of gasoline range organics (GRO) below detectable limits and a diesel range organics (DRO) concentration of 282 mg/kg. The excavated soil was returned to the excavation and contoured to the surrounding area. On 9/15/2010, the site was seeded with a blend of native vegetation. A junction box is no longer needed at the site.

Vegetation at the site had not recovered; therefore, RECS personnel were on site to seed the surrounding area on 2/22/2013. The site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate. Vegetation will act as

RECEIVED OGD
2013 APR 12 P 1:22

an evapo-transpiration barrier in that plants capture water through their roots and so reduce the amount of water infiltrating below the root zone.

The junction box site location map, final report, photodocumentation, laboratory analysis, PID sheet, chloride graph, revegetation form and seeding 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.

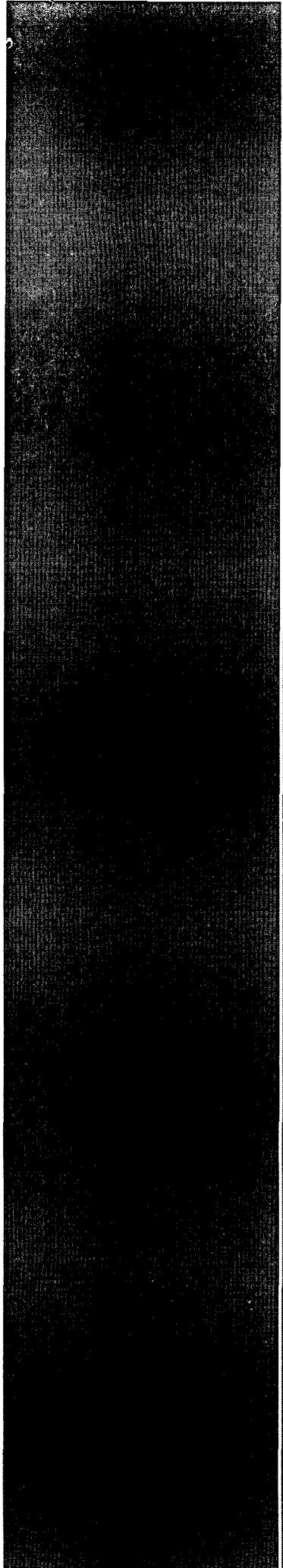
Please contact me at (575)393-9174 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,
RICE Operating Company

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

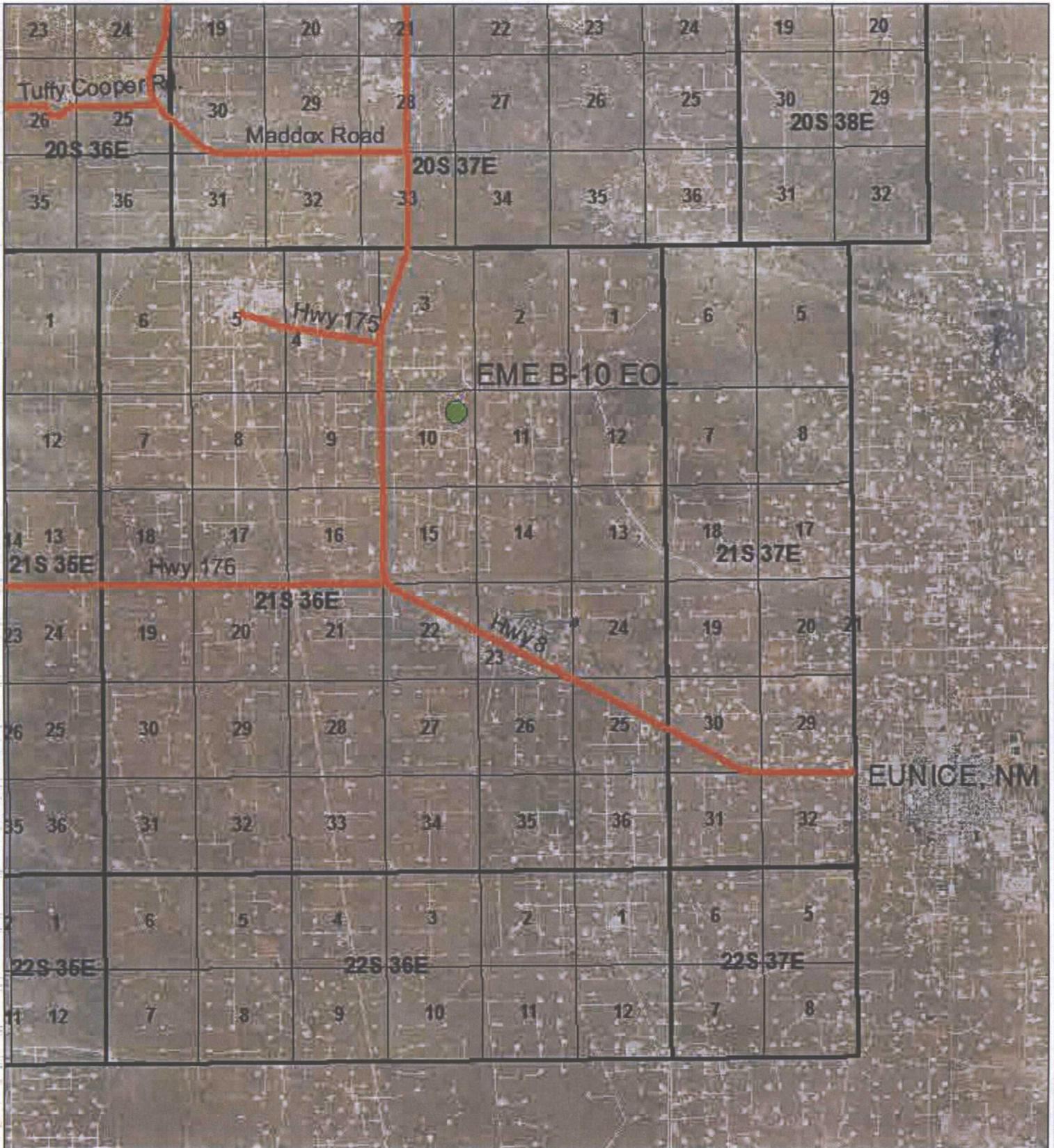
Hack Conder
Environmental Manager

enclosures



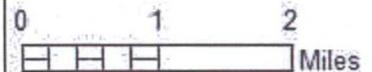
Site Location Map

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



EME B-10 EOL

UL B SECTION 10
T-21-S R-36-E
LEA COUNTY, NM



Drawing date: 1/23/13
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

**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	B-10 EOL	B	10	21S	36E	Lea	Eliminated		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER Millard Deck OTHER _____

Depth to Groundwater 200 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 9/15/2010 Date Completed 9/15/2010 OCD Witness no

Soil Excavated 3.7 cubic yards Excavation Length 5 Width 2 Depth 10 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 9/15/2010 Sample Depth 10 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 10' GRAB	0.0	<10.0	282	96

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
background	6	86
vertical delineation trench at the junction (source)	5'	113
	6'	85
	7'	91
	8'	142
	9'	141
	10'	139

General Description of Remedial Action: This junction and line were eliminated under the pipeline replacement/upgrade program. After the former junction was removed, an investigation was conducted using a backhoe to collect soil samples at regular intervals. Chloride field tests were performed on each sample, which yielded low concentrations of chloride similar to that of the background sample. Organic vapors were measured using a PID, which also yielded low concentrations. The deepest sample, 10 ft.

BGS, was sent to a commercial laboratory for analysis, which confirmed low concentrations of chloride and organics. The excavated soil was returned to the excavation to ground surface and contoured to the surrounding area. On 9/15/2010, 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 graph

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

SITE SUPERVISOR Robert Egans SIGNATURE *Robert Egans* 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 8-23-11

EME B-10 EOL

Unit B, Section 10, T21S, R36E



Site prior to excavation

9/15/2010



Delineation Trench being excavated

9/15/2010



Collecting sample

9/15/2010



Seeding excavation

9/15/2010

Analytical Results For:

Rice Operating Company
 Bruce Baker
 112 W. Taylor
 Hobbs NM, 88240
 Fax To: (575) 397-1471

Received:	09/15/2010	Sampling Date:	09/15/2010
Reported:	09/20/2010	Sampling Type:	Soil
Project Name:	EME B-10 EOL (21/36)	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: SOURCE @ 10' (H020862-01)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	96.0	16.0	09/16/2010	ND	464	116	400	3.51		

TPH 8015M		mg/kg		Analyzed By: AB						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	09/18/2010	ND	165	82.5	200	2.83		
DRO >C10-C28	282	10.0	09/18/2010	ND	164	82.1	200	0.607		

Surrogate: 1-Chlorooctane 90.7 % 70-130
 Surrogate: 1-Chlorooctadecane 86.3 % 70-130

COPY

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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: <u>Rice Operating Company</u>				BILL TO				ANALYSIS REQUEST													
Project Manager: <u>Bruce Baker</u>				P.O. #:																	
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:				State: Zip:																	
Project Location: <u>EME B-10 FOL (21136)</u>				Phone #:																	
Sampler Name: <u>Robert Egan</u>				Fax #:																	
FOR LAB USE ONLY																					
Lab I.D.		Sample I.D.		G/RABOR (COMP.	# CONTAINERS	MATRIX				PRESERV.		SAMPLING		TPH 8015M OL							
		GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE	ICE/COOL	OTHER:	DATE	TIME									
<u>H204621</u>		<u>Source @ 10'</u>		<u>G</u>	<u>1</u>						<u>9-15-10</u>	<u>12:55</u>	<u>✓</u>			<u>✓</u>					

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>Robert</u>		Date: _____		Received By: _____		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No		Add'l Phone #: _____	
Time: _____		Time: _____		Time: _____		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No		Add'l Fax #: _____	
Relinquished By: _____		Date: <u>9/15/10</u>		Received By: <u>Jodi Henson</u>		REMARKS: <u>E-Mail Results To:</u>			
Time: <u>4:43</u>		Time: _____		Time: _____		<u>K Jones @ RiceSud.COM</u>			
Delivered By: (Circle One)		Sample Condition		CHECKED BY:		<u>Baker</u>			
<u>Sampler</u> - UPS - Bus - Other:		Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/>		(Initials)		<u>Egan</u>			
		<input type="checkbox"/> Yes <input type="checkbox"/> No							

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

#26

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:

✓

Model: PGM 7300 Serial No: 590-000183
 Model: PGM 7300 Serial No: 590-000508
 Model: PGM 7300 Serial No: 590-000504

Model: PGM 7600 Serial No: 110-023920
 Model: PGM 7600 Serial No: 110-013744
 Model: PGM 7600 Serial No: 592-903318

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO :	EXPIRATION DATE: <i>9-27-2017</i>
FILL DATE:	METER READING ACCURACY: <i>100ppm</i>

ACCURACY : +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
<i>EMF</i>	<i>B-10 EOL</i>	<i>B</i>	<i>10</i>	<i>21</i>	<i>36</i>

SAMPLE ID	PID	SAMPLE ID	PID
<i>Source 5'</i>	<i>0</i>	<i>Background</i>	<i>0</i>
<i>6'</i>	<i>0</i>		
<i>7'</i>	<i>0</i>		
<i>8'</i>	<i>0</i>		
<i>9'</i>	<i>0</i>		
<i>10'</i>	<i>0</i>		

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

SIGNATURE: *Walter...*

DATE: *3-22-2011*

CHLORIDE CONCENTRATION CURVE

RICE Operating Company

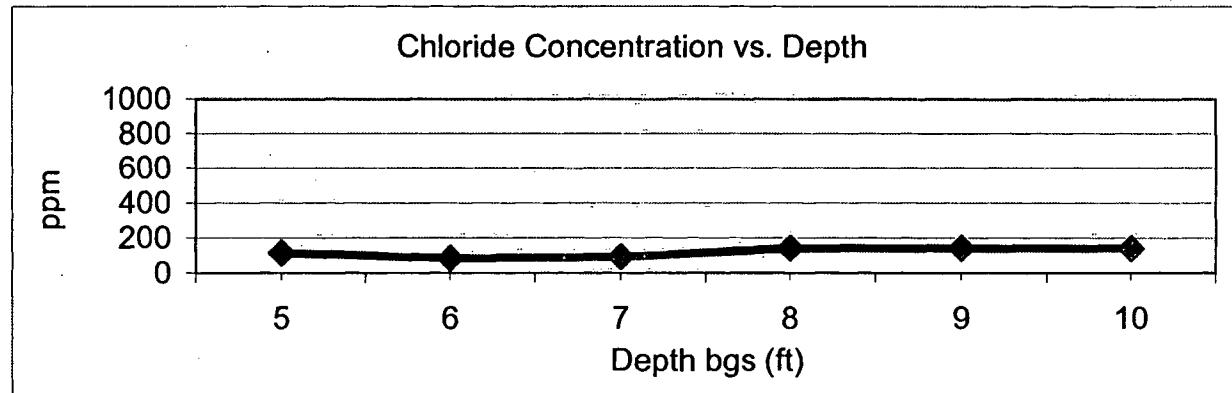
EME B-10 EOL

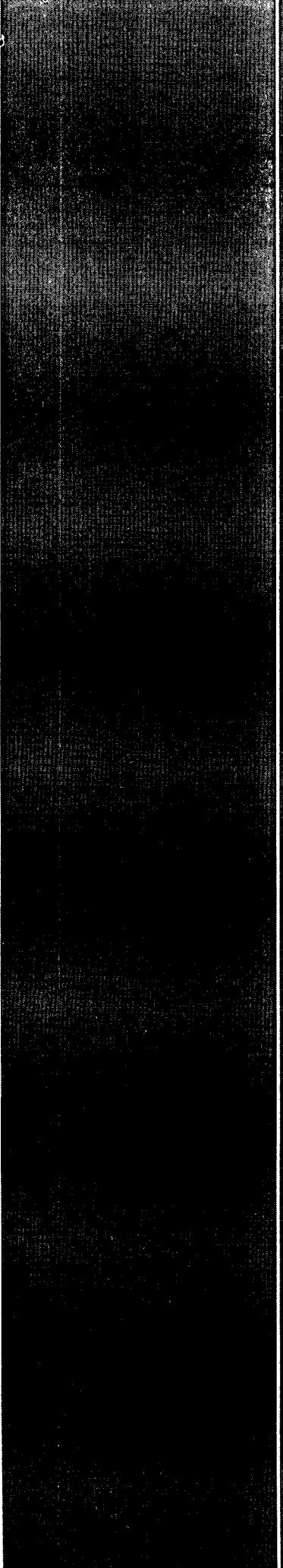
Unit 'B', Sec. 10, T21S, R36E

Backhoe samples at the junction (source)

Depth bgs (ft)	[Cl] ppm
5	113
6	85
7	91
8	142
9	141
10	139

Groundwater = 200 ft.





Revegetation Form and Photodocumentation

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



PO Box 5630
 Hobbs, NM 88241
 Phone: (575) 393-4411
 Fax: (575) 393-0293

REVEGETATION FORM

1. General Information

Site name: EME B-10 EOL						
U/L B	Section 10	Township T-21-S	Range R-36-E	County Lea	Latitude N32*29'49"	Longitude W103*14'55"
Contact Name: Hack Conder						
Email: hconder@riceswd.com						
Site size: 400 square feet			Map detail of site attached <input type="checkbox"/>			
Additional information:						

2. Soils

**Do not rip caliche subsoils; caliche rocks brought to the surface by ripping shall be removed.*

Salvaged from site <input checked="" type="checkbox"/>	Bioremediated <input type="checkbox"/>	Imported <input type="checkbox"/>	Blended <input type="checkbox"/>	Depth (in):
Texture: Describe soil & subsoil:				
Soil prep methods: Rip <input type="checkbox"/>	Depth(in):	Disc <input type="checkbox"/>	Depth (in):	Rollerpack <input type="checkbox"/>
Date completed: 9/15/2010				

3. Bioremediation

Fertilizer <input type="checkbox"/>	Hay <input type="checkbox"/>	Other <input type="checkbox"/>
Type:	Describe:	
Lbs/acre:		

4. Seeding

**Attach seed bag tags to this form. Seed bag tags shall contain the site name and S-T-R.*

Custom seed mix <input checked="" type="checkbox"/>	Prescribed mix <input type="checkbox"/>	Seed mix name: 1 lbs. Lea co. Mix/1 lbs. Side Oats/1 lbs. Winter Wheat	Seeding date: 2/22/2013
Broadcast <input checked="" type="checkbox"/>			
Method: Hand Broadcast			
Soil conditions during seeding: Dry <input checked="" type="checkbox"/> Damp <input type="checkbox"/> Wet <input type="checkbox"/>			
Photos attached <input type="checkbox"/>	Observations:		
Number of photos:	The Seed was Raked into the soil.		

5. Certification

I hereby certify that the information in this form and attachments is true and complete to the best of my knowledge and belief.

Name: Kyle Norman	Title: Environmental Tech	Date: 2/22/2013
Signature:		

EME B-10 EOL

Unit B, Section 10, T21S, R36E



Site prior to seeding, facing east

2/22/2013



Seeding site, facing north

2/22/2013



Raking in seed, facing west

2/22/2013



Site completed, facing south

2/22/2013