

1R - 427-123

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, April 29, 2013 4:55 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 (1R427-123) Termination - ROC EME L-31 Site

**RE: Termination Request
for the Rice Operating Company's
EME L-31 Site
Unit Letter L, Section 31, T20S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-123) 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 5, 2013 (received April 9, 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 (1R427-123) 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 9330

RECEIVED

April 5, 2013

APR 9 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 L-31 (1R427-123): UL/L, Sec. 31, T20S, 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 2001, ROC initiated work on the former L-31 junction box. The site is located in UL/L, Sec. 31, T20S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 80 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 13x13x6 ft deep excavation. Each sample was field titrated for chlorides, resulting in chloride 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 339 mg/kg, a gasoline range organics (GRO) concentration below detectable limits and a diesel range organics (DRO) concentration of 55.7 mg/kg. The sample was also analyzed for BTEX, resulting in a benzene concentration below detectable limits, 0.011 mg/kg for toluene, 0.006 mg/kg for ethyl benzene and 0.019 mg/kg for total xylenes. The bottom composite sample resulted in a chloride concentration of 824 mg/kg and concentrations of GRO and DRO below detectable limits. The sample was also analyzed for BTEX, resulting in concentrations below detectable limits throughout.

A total of 36 cubic yards of excavated soil was properly disposed of at an NMOCD approved 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. The clay layer will provide a barrier that will inhibit the downward migration of chlorides to groundwater. A new, watertight junction was installed at the site and has since been removed.

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.

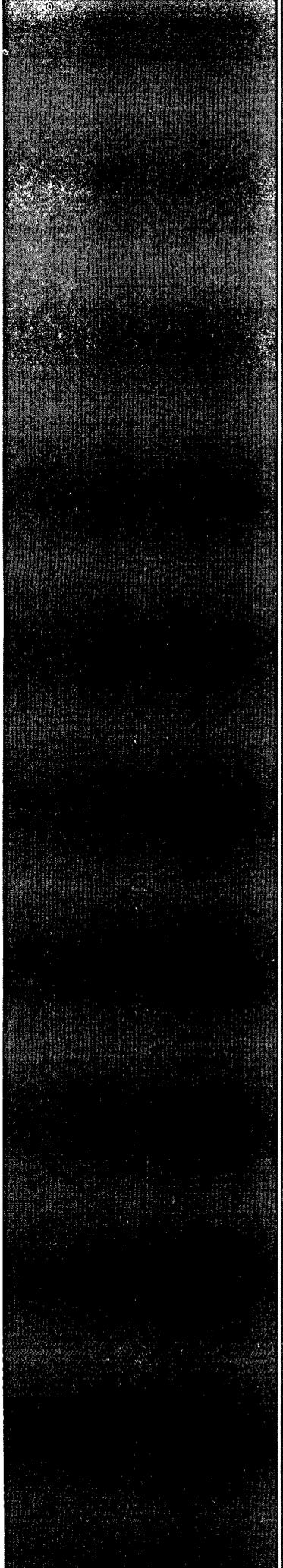
Sincerely,
RICE Operating Company



Hack Conder
Environmental Manager

enclosures

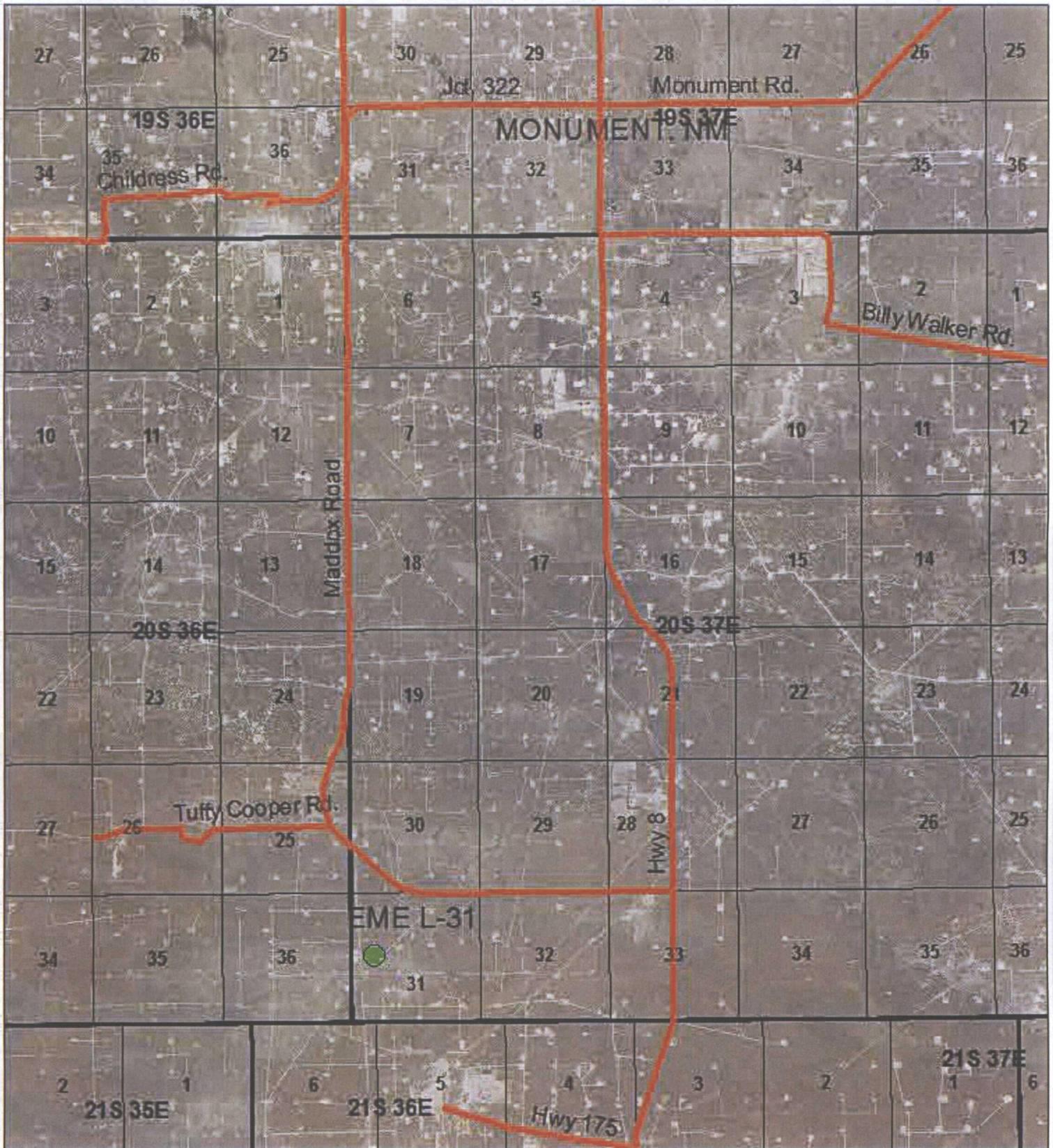
RECEIVED OGD
2013 APR -9 P 2:48



Site Location Map

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

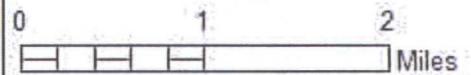
Site Location Map



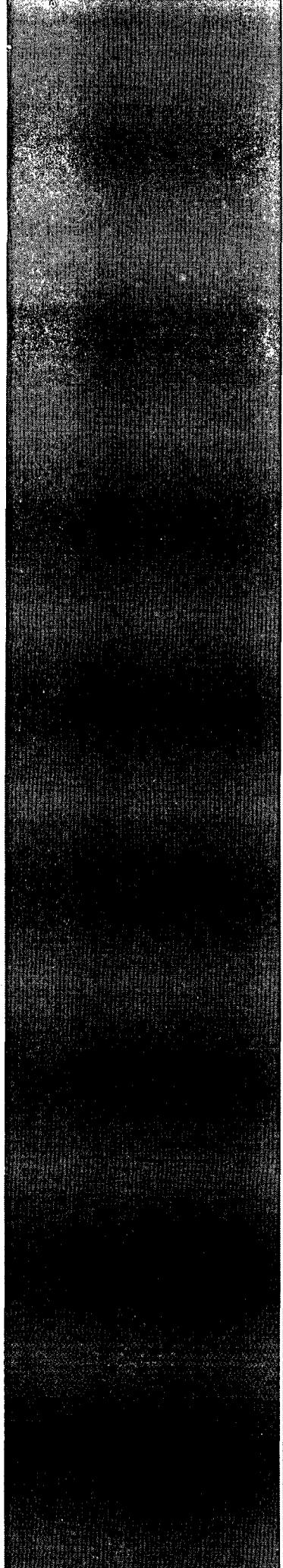
EME L-31

Unit Letter L, Section 31,
T20S, R37E
Lea County, NM

NMOCD #1R427-123



Drawing date: 3/28/13



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	L-31	L	31	20S	37E	LEA	10	6	5

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

Depth to Groundwater 80 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 02/07/2001 Date Completed 02/07/2001 OCD Witness NO

Soil Excavated 38 cubic yards Excavation Length 13 Width 13 Depth 6 feet

Soil Disposed 36 cubic yards Offsite Facility Sundance Location Eunice, NM

FINAL ANALYTICAL RESULTS: Sample Date 02/07/2001 Sample Depth 6'

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	< 0.005	0.011	0.006	0.019	<50	55.7	339
BOTTOM	< 0.005	< 0.005	< 0.005	<0.015	<50	<50	824

General Description of Remedial Action: Delineated site to below NMOCD guidelines.

CHLORIDE FIELD TESTS

Vertical delineation demonstrated impact probably did not reach groundwater. At 4' bgs the chlorides were tested at 1650 ppm and declined to 840 ppm at 6' bgs. The high impact soil was hauled to a permitted disposal facility. Installed a compacted clay barrier to vertical transmissivity and a water tight junction box. Backfilled with fresh soil. Natural attenuation will remediate the remaining hydrocarbon.

LOCATION	DEPTH	mg/kg
SIDEWALLS	4'	453
BOTTOM	4'	1650
BOTTOM	6'	840

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

DATE December 17, 2001

PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson*

TITLE Project Leader - Environmental



**ARDINAL
LABORATORIES**

PHONE (915) 873-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

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

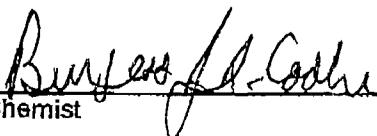
ANALYTICAL RESULTS FOR
RICE OPERATING CO.
ATTN: JAMES STURGILL
122 W. TAYLOR
HOBBS, NM 88240
FAX TO:

Receiving Date: 02/07/01
Reporting Date: 02/09/01
Project Number: L-31 SIDES & BOTTOM
Project Name: L-31 SIDES & BOTTOM
Project Location: L-31 SEC 31 T20 R37E-EME

Sampling Date: 02/07/01
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (>C ₁₀ -C ₂₈) (mg/Kg)	CI* (mg/Kg)
	ANALYSIS DATE	02/09/01	02/09/01	02/08/01
H5588-1	L-31 SIDES	<50	55.7	339
H5588-2	L-31 BOTTOM	<50	<50	824
	Quality Control	728	778	980
	True Value QC	800	800	1000
	% Recovery	91.0	97.3	98.0
	Relative Percent Difference	2.3	2.5	7.2

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


Chemist

2/9/01
Date

H5588T.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.



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: <i>Rice Operating</i>		BILL TO		ANALYSIS REQUEST																					
Project Manager: <i>JAMES STURGILL</i>		P.O. #:																							
Address: <i>122 W TAYLOR</i>		Company:																							
City: <i>Hobbs</i> State: <i>NM</i> Zip: <i>88240</i>		Attn:																							
Phone #: <i>393 9124</i> Fax #:		Address:																							
Project #: <i>L-31 Sides and Bottom</i> Project Owner:		City:																							
Project Name: <i>L-31 Sides and Bottom</i>		State: Zip:																							
Project Location: <i>L-31 Area 31 T&O R375 - FME</i>		Phone #:																							
Sampler Name: <i>James Sturgill</i>		Fax #:																							
FOR LAB USE ONLY												<i>BTB, CL, 8015</i>													
Lab I.D.		Sample I.D.		# CONTAINERS	MATRIX					PRESERV.												SAMPLING			
					GROUNDWATER	WASTEWATER	SOIL	CRUDE OIL	SLUDGE	OTHER:	ACID/BASE:											ICE / COOL	OTHER:	DATE	TIME
<i>L5588-1</i>	<i>L-31 Sides</i>	<i>9</i>				<i>X</i>																	<i>2/7/01</i>	<i>11:45</i>	<i>X</i>
<i>-2</i>	<i>L-31 Bottom</i>	<i>4</i>				<i>X</i>																			<i>X</i>

PLEASE NOTE: Liability and Damages. Cardinal's liability and owner'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.

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 collection, including attorney's fees.

Sampler Relinquished: <i>James Sturgill</i>		Date: <i>2-7-01</i> Time: <i>11:45</i>	Received By:		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:	
Relinquished By:		Date: <i>2/7/01</i> Time: <i>4:00 PM</i>	Received By: (Lab Staff) <i>Dunstan A. Cashe</i>		Fax Result: <input type="checkbox"/> Yes <input 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)			REMARKS:

† 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

NL 36845

LEASE OPERATOR/SHIPPER/COMPANY: _____

LEASE NAME: _____

TRANSPORTER COMPANY: _____

TIME: _____

AM/PM

DATE: _____

VEHICLE NO.: _____

DRIVER NO.: _____

CHARGE TO: _____

TYPE OF MATERIAL

Production Water

Drilling Fluids

Completion Fluids

Tank Bottoms

Contaminated soil

C-117 No.: _____

Other Material:

BS&W Content: _____

Description: _____

VOLUME OF MATERIAL BBLs. _____ :

YARD _____ :

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: _____

(SIGNATURE)

FACILITY REPRESENTATIVE: _____

(SIGNATURE)

White-Sundance Canary-Sundance Acct#1 Pink-Sundance Acct#2 Gold-Transporter

Revised 12/27/95

Sundance Services, Inc.

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

39877

LEASE OPERATOR/SHIPPER/COMPANY:

LEASE NAME: C-31

TRANSPORTER COMPANY:

TIME: AM/PM

DATE:

VEHICLE NO.:

DRIVER NO.:

CHARGE TO:

TYPE OF MATERIAL

Production Water

Drilling Fluids

Completion Fluids

Tank Bottoms

Contaminated soil

C-117 No.: _____

Other Material:

BS&W Content: _____

Description: _____

VOLUME OF MATERIAL BBLs. _____ : YARD _____ : _____

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.

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DRIVER: _____

(SIGNATURE)

FACILITY REPRESENTATIVE: _____

(SIGNATURE)

White-Sundance Canary-Sundance Acct#1 Pink-Sundance Acct#2 Gold-Transporter
Revised 12/27/95

Sundance Services, Inc.

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

NC 36843

LEASE OPERATOR/SHIPPER/COMPANY: Pick

LEASE NAME: AME 200 ~~2002~~ J-31

TRANSPORTER COMPANY: Unit 20115

TIME:

AM/PM

DATE: 1-13-01

VEHICLE NO.:

DRIVER NO.:

CHARGE TO: Pick

TYPE OF MATERIAL

Production Water

Drilling Fluids

Completion Fluids

Tank Bottoms

Contaminated soil

C-117 No.:

Other Material:

BS&W Content: _____

Description: dry dirt

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: _____

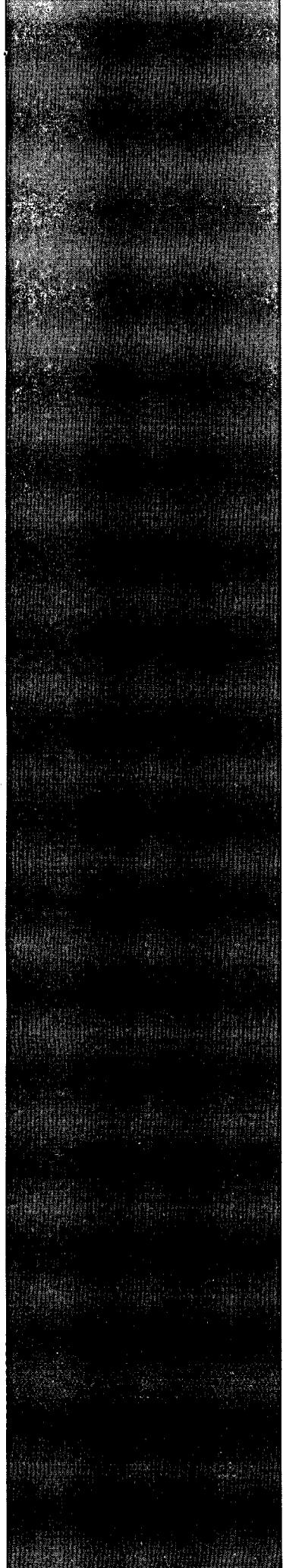
(SIGNATURE)

FACILITY REPRESENTATIVE: _____

(SIGNATURE)

White-Sundance Canary-Sundance Acct#1 Pink-Sundance Acct#2 Gold-Transporter

Revised 12/27/95



Current Photodocumentation

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

EME L-31

UL/L, Section 31, T20S, R37E



Facing north

3/13/2013



Facing south

3/13/2013