

1R - 427-110

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, April 29, 2013 3:38 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 (1R427-110) Termination - ROC EME C-1-1 Site

**RE: Termination Request
for the Rice Operating Company's
EME C-1-1 Site
Unit Letter C, Section 1, T20S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-110) 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 (1R427-110) 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 RECEIVED

122 West Taylor • Hobbs, New Mexico 88240

Phone: (575) 393-9174 • Fax: (575) 397-1471

APR 9 2013

CERTIFIED MAIL
RETURN RECEIPT NO. 7007 2560 0000 4569 9330

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

April 5, 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 C-1-1 (1R427-110): UL/C Sec. 1, T20S, 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 2001, ROC initiated work on the former C-1-1 junction box. The site is located in UL/C, Sec. 1, T20S, R36E. The junction box report states that no groundwater is present at this site, based on the soil bore drilled to a depth of 29 ft; however, monitoring wells installed at a near-by site encountered groundwater at approximately 39 +/- ft. After the junction box was removed, a soil bore was initiated on September 18, 2001 to investigate the depth of chloride presence. The boring was advanced to a total depth of 29 ft BGS with soil samples collected at regular intervals. A sample at 29 ft bgs was taken to a commercial laboratory for analysis, resulting in a chloride concentration of 68 mg/kg, a DRO concentration of 272 mg/kg and GRO and BTEX concentrations below detectable limits.

The site was then delineated using a backhoe to collect soil samples at regular intervals, creating a 22x15x8 ft deep excavation. Each sample was field titrated for chlorides. Representative composite samples of the excavation bottom and the excavation walls were sent to a commercial for analysis of chloride, TPH and BTEX, resulting in a sidewall chloride concentration of 585 mg/kg, diesel range organics (DRO) concentration of 176 mg/kg and concentrations of gasoline range organics (GRO) and BTEX below

detectable limits. The bottom composite resulted in a chloride concentration of 452 mg/kg, a DRO concentration of 280 mg/kg and concentrations of gasoline range organics (GRO) and BTEX below detectable limits. A compacted clay layer was installed at 8 ft below ground surface (bgs) and the excavation was backfilled with clean soil to ground surface and contoured to the surrounding area. The clay layer would provide a barrier that will inhibit the downward migration of chlorides to groundwater. A new, watertight junction was installed over the site.

This site is located within the regionally impacted groundwater plume in an area with groundwater chloride concentrations between 5,000 – 10,000 mg/l (see Site Location Map). Monitor well sampling of the Environmental Protection Agency monitor wells located around Climax Chemical shows an up gradient well with a chloride concentration of 23,000 mg/L and a down gradient well with a chloride concentration of 10,700 mg/L. Monitor well sampling at a nearby, up-gradient well shows a chloride concentration of 6,100 mg/l.

The area north and west of this box was encompassed in the surface restoration completed for the near-by EOL site; therefore, additional seeding is not required

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

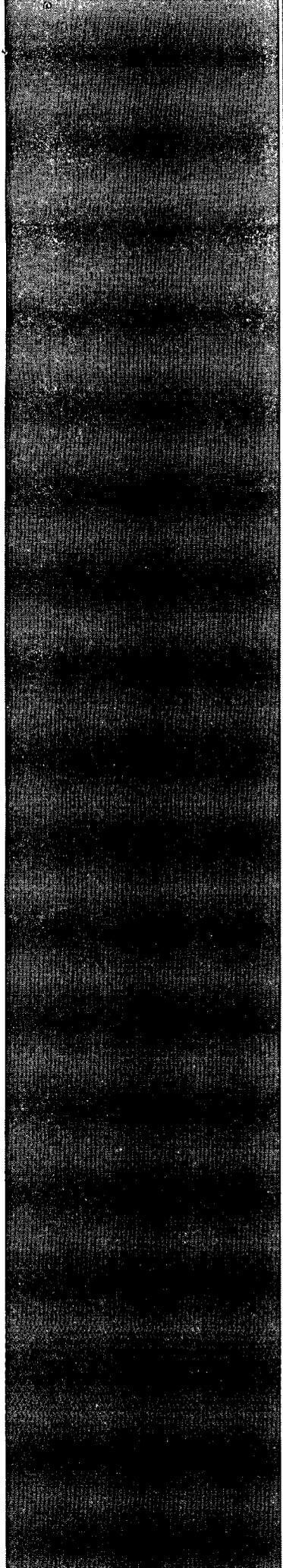
Sincerely,
RICE Operating Company



Hack Conder
Environmental Manager

enclosures

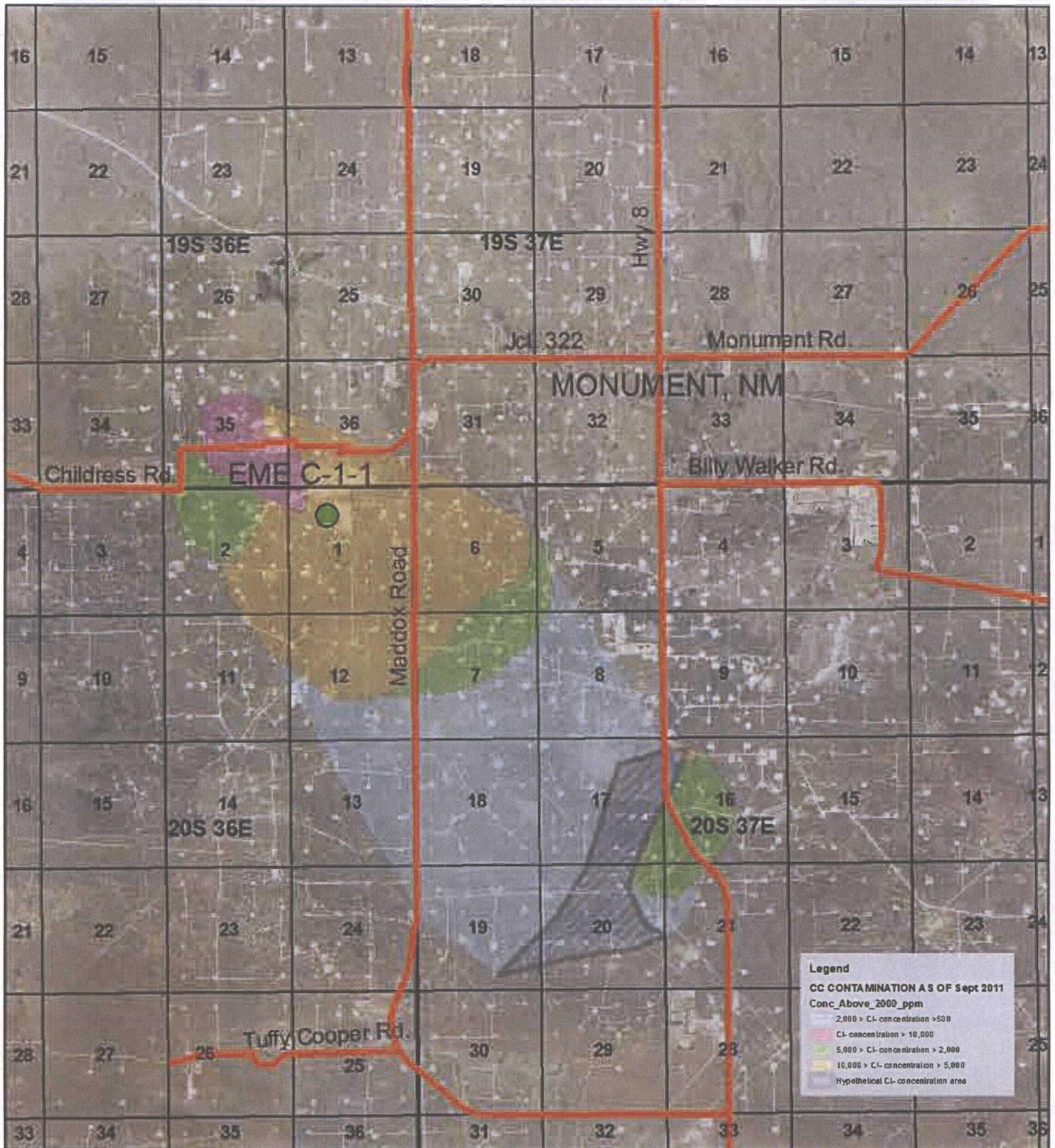
RECEIVED OGD
2013 APR - 9 P 2: 48



Site Location Map

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

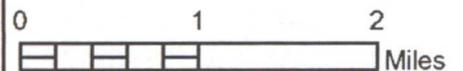
Site Location Map



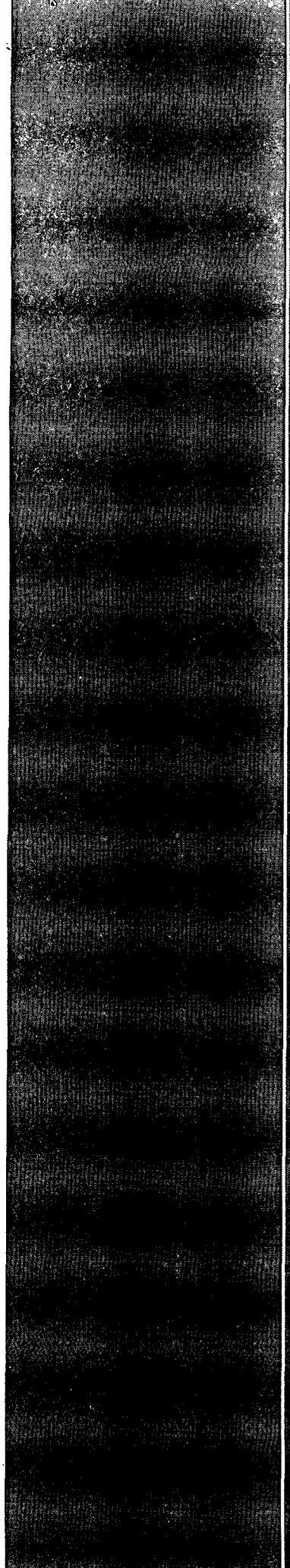
EME C-1-1

Unit Letter C, Section 1,
T20S, R36E
Lea County, NM

NMOCD Case #: 1R427-110



Drawing date: 4/2/13



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	C-1-1	C	1	20S	36E	LEA	11	10	6

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER EL PASO NATURAL GAS OTHER _____

Depth to Groundwater None feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 08/14/2001 Date Completed 09/18/2001 OCD Witness NO

Soil Excavated 100 cubic yards Excavation Length 22 Width 15 Depth 8 feet

Soil Disposed 48 cubic yards Offsite Facility South Monument Disposal Location MONUMENT,NM

FINAL ANALYTICAL RESULTS: Sample Date 10/08/2001 Sample Depth 8'

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	<.025	<.025	<.025	<.025	<50	176	585
BOTTOM	<.025	<.025	<.025	<.025	<50	280	452
Boring @ 29'	<.025	<.025	<.025	<.025	<10	272	68

General Description of Remedial Action: A soil boring on this site, completed 9/18/01,

demonstrated a dramatic drop in TPH from 1620 ppm at 15'bgs to 352 ppm at 29' bgs. A lab verification of the 29' sample was 272 ppm TPH, all DRO. There are no water wells within a .75 mile radius of this site. Those wells to the south are 24-26' bgs. There are no wells in the section north of this site. The soil boring did not encounter any water to 29'. Based on the results of the soil boring (no ground water was found), and the "stranded pocket" of the remaining plume is aliphatic (long chain) fraction with no significant BTEX, the impact at this site poses no threat to public health or the environment. The junction box site was excavated to 8' bgs and an compacted clay layer was installed as a barrier to vertical transmissivity. A water tight box was installed around the pipe junction and valves. Natural attenuation will remediate the remaining hydrocarbon.

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS	3'	600
BOTTOM	8'	525
Soil Boring	5'	124
	10'	142
	15'	99
	20'	159
	23'	131
	29'	80

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

DATE October 15, 2001

PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson*

TITLE Project Leader - Environmental

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

RICE OPERATING COMPANY
ATTN: DONNIE ANDERSON
122 W. TAYLOR
HOBBS, NM 88242
FAX: 505-397-1471

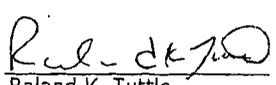
Sample Type: Soil
Sample Condition: Intact/ Iced/ 4.0 deg C
Project Name: EME Box Upgrade
Project #: C-1-1
Project Location: Lea County, NM
PO#: 716

Sampling Date: 10/08/01
Receiving Date: 10/08/01
Analysis Date: 10/09/01

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg
0101737-01	Wall Composite	<50	176
0101737-02	Btm Composite	<50	280

QUALITY CONTROL	573	513
TRUE VALUE	500	500
% INSTRUMENT ACCURACY	115	103
SPIKED AMOUNT	476	476
ORIGINAL SAMPLE	<10	<10
SPIKE	562	608
SPIKE DUP	555	604
% EXTRACTION ACCURACY	116	122
BLANK	<10	<10
RPD	1.25	0.66

Methods: SW 846-8015M


Raland K. Tuttle

10-11-01
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

RICE OPERATING COMPANY
ATTN: DONNIE ANDERSON
122 W. TAYLOR
HOBBS, NM 88242
FAX: 505-397-1471

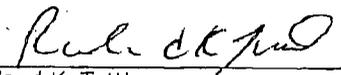
Sample Type: Soil
Sample Condition: Intact/ Iced/ 4.0 deg C
Project Name: EME Box Upgarde
Project #: C-1-1
Project Location: Lea County, NM
PO#: 716

Sampling Date: 10/08/01
Receiving Date: 10/08/01
Analysis Date: 10/09/01

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
0101737-01	Wall Composite	<0.025	<0.025	<0.025	<0.025	<0.025
0101737-02	BTM Composite	<0.025	<0.025	<0.025	<0.025	<0.025

QUALITY CONTROL	0.104	0.104	0.100	0.205	0.095
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% IA	104	104	100	102	95
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	<0.025	<0.025	<0.025	0.051	<0.025
SPIKE	0.099	0.091	0.088	0.176	0.089
SPIKE DUP	0.090	0.086	0.085	0.172	0.084
%EA	99	91	88	87	89
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025
RPD	9.52	5.65	3.47	2.32	5.78

METHODS: SW 846-8021B, 5030


Raland K. Tuttle

10-11-01
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

RICE OPERATING COMPANY
ATTN: DONNIE ANDERSON
122 W. TAYLOR
HOBBS, NM 88242
FAX: 505-397-1471

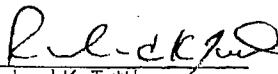
Sample Type: Soil
Sample Condition: Intact/ Iced/ 4.0 deg C
Project Name: EME Box Upgrade
Project #: C-1-1
Project Location: Lea County, NM
PO#: 716

Sampling Date: 10/08/01
Receiving Date: 10/08/01
Analysis Date: 10/11/01

ELT#	FIELD CODE	Chloride mg/kg
0101737-01	Wall Composite	585
0101737-02	BTM Composite	452

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	500
ORIGINAL SAMPLE	585
SPIKE	1080
SPIKE DUP	1070
% EXTRACTION ACCURACY	99
BLANK	<5.00
RPD	0.93

Methods: SW 846-9253


Roland K. Tuttle

10-11-01
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

RICE OPERATING CO.
ATTN: MR. DONNIE ANDERSON
122 W. TAYLOR
HOBBS, NM 88240
FAX: 505-397-1471

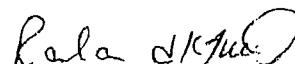
Sample Type: Soil
Sample Condition: Intact/ Iced/ 3 deg C
Project Name: EME Box Upgrade
Project #: ~~692~~
Project Location: Lea County
PO#: 692

Sampling Date: 09/18/01
Receiving Date: 09/24/01
Analysis Date: 09/26/01

ELT#	FIELD CODE	Chloride mg/kg
0101625-01	29' Soil Boring	68

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	526
ORIGINAL SAMPLE	392
SPIKE	933
SPIKE DUP	924
% EXTRACTION ACCURACY	101
BLANK	<5.00
RPD	0.97

Methods: SW 846-9253


Ralanda K. Tuttle

9-27-01
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

RICE OPERATING CO.
ATTN: MR. DONNIE ANDERSON
122 W. TAYLOR
HOBBS, NM 88240
FAX: 505-397-1471

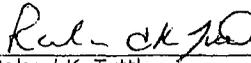
Sample Type: Soil
Sample Condition: Intact/ Iced/ 3 deg C
Project Name: EME Box Upgrade
Project #: C-1-1
Project Location: Lea Coounty
PO#: 692

Samplng Date: 09/18/01
Receiving Date: 09/24/01
Analysis Date: 09/25/01

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg
0101625-01	29' Soil Boring	<10	272

QUALITY CONTROL	460	480
TRUE VALUE	500	500
% INSTRUMENT ACCURACY	92	96
SPIKED AMOUNT	476	476
ORIGINAL SAMPLE	<10	<10
SPIKE	501	508
SPIKE DUP	504	502
% EXTRACTION ACCURACY	105	107
BLANK	<10	<10
RPD	0.95	1.89

Methods: SW 846-8015M


Raland K. Tuttle

9-27-01
Date

ENVIRONMENTAL LAB OF , INC.

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122 W. TAYLOR
HOBBS, NM 88240
FAX: 505-397-1471

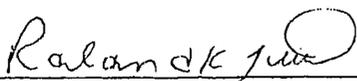
Sample Type: Soil
Sample Condition: Intact/ Iced/ 3 deg C
Project Name: EME Box Upgrade
Project #: C-1-1
Project Location: Lea County
PO#: 692

Sampling Date: 09/18/01
Receiving Date: 09/24/01
Analysis Date: 09/25/01

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
0101625-01	29' Soil Boring	<0.025	<0.025	<0.025	<0.025	<0.025

QUALITY CONTROL	0.100	0.100	0.097	0.199	0.092
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% IA	100	100	97	100	92
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	<0.025	<0.025	<0.025	0.039	<0.025
SPIKE	0.104	0.101	0.100	0.204	0.095
SPIKE DUP	0.101	0.097	0.097	0.198	0.093
%EA	104	101	100	101	95
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025
RPD	2.93	4.04	3.04	3.16	2.13

METHODS: EPA SW 846-8021B ,5030


Raland K. Tuttle

9-27-01
Date

DRILLING LOG	Site Name/Location	Well No. N/A			Date Drilled: 9/19/01	Driller: Adkins	Logged by: DEA
RICE Operating Company 122 West Taylor Hobbs, New Mexico 88240 Phone: (505) 393-9174 Fax: (505) 397-1471	Jct. Box C-1-1 1-T20S-R36E EME SWD System Lea County, NM	Well Depth: N/A	Boring Depth: 29'	Well Material: N/A	Construction: Plugged boring w/ 20' bentonite, water & backfill		
		Casing Length: N/A	Boring Diameter: 2.5"	Casing Size: N/A			
		Screen Length: N/A	Drilling Method: Air Rotary	Slot Size: N/A			

TEST						
DEPTH	SUBSURFACE LITHOLOGY	SAMPLE TYPE	(ppm)	REMARKS	Boring	
0	Ground surface		CI	TPH		
1	Sand	Grab				
2						
3						
4						
5	Dry sandy caliche		124	18		
6						
7						
8	Dry caliche rock					
9						
10	Dry caliche sand		142	3		
11						
12						
13	Dry caliche rock					
14						
15			99	1620		
16						
17						
18	Dry caliche					
19						
20			159	1095		
21						
22						
23	Hard limestone		131	320		
24						
25						
26	Dry caliche sand			513		
27						
28						
29	Dry caliche sand		80	352		

3-Chen

SOUTH MONUMENT SURFACE WASTE FACILITY

TICKET NO # 4446

LEASE OPERATOR CHRIS RODRIGUEZ - 7-18-01
Rice Operating Corporation
ORIGINATING LOCATION: ~~XXXXX~~
Sec 36 T19S R36E

TRANSPORTER NAME & ADDRESS

WALTON CONSTRUCTION CO., INC.
P. O. BOX 478
HOBBS, NM 88241-0478
Attn: KENA KAY COOPER

DESCRIPTION OF WASTE QUANTITY
Non-Hazardous Hydrocarbons 12 yds.

FACILITY CONTACT: [Signature]
SIGNATURE OF CONTACT DATE 8/30/01

CELL NUMBER MATERIAL WAS PLACE IN LANDFARM: B-1

NAME OF TRANSPORTER (DRIVER):
[Signature]
SIGNATURE OF DRIVER DATE 8/30/01

DISPOSAL SITE

South Monument Surface Waste Facility
P. O. Box 418
Hobbs, NM 88241-0418
Sec 25 T20S R36E N/2NE/4

"As a condition of acceptance for disposal, I hereby certify that this waste is an exempt waste as defined by the Environmental Protection Agency (EPA). The waste are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C regulations; and not mixed with non-exempt waste."

[Signature]
FACILITY REPRESENTATIVE DATE 8/30/01

SOUTH MONUMENT SURFACE WASTE FACILITY

TICKET NO # 4447

LEASE OPERATOR CHRIS Rodriguez ORIGINATING LOCATION: ~~836E~~
Rice Operating Corporation Sec 36 T19S R36E

TRANSPORTER NAME & ADDRESS

WALTON CONSTRUCTION CO., INC.
P. O. BOX 478
HOBBS, NM 88241-0478

Attn: KENA KAY COOPER

DESCRIPTION OF WASTE

QUANTITY

Non-Hazardous Hydrocarbons

12 yds.

FACILITY CONTACT:

[Signature]
SIGNATURE OF CONTACT

8/30/01
DATE

CELL NUMBER MATERIAL WAS PLACE IN LANDFARM: B-1

NAME OF TRANSPORTER (DRIVER):

[Signature]
SIGNATURE OF DRIVER

8/30/01
DATE

DISPOSAL SITE

South Monument Surface Waste Facility
P. O. Box 418
Hobbs, NM 88241-0418
Sec 25 T20S R36E N/2NE/4

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[Signature]
FACILITY REPRESENTATIVE

8/30/01
DATE

SOUTH MONUMENT SURFACE WASTE FACILITY

TICKET NO # 4448

LEASE OPERATOR

Rice Operating Corporation

CHRIS Rodriguez - 7-73-01

ORIGINATING LOCATION: ~~D-36-1~~

Sec 36 T19S R36E

TRANSPORTER NAME & ADDRESS

WALTON CONSTRUCTION CO., INC.
P. O. BOX 478
HOBBS, NM 88241-0478

Attn: KENA KAY COOPER

DESCRIPTION OF WASTE

Non-Hazardous Hydrocarbons

QUANTITY

12 yds.

FACILITY CONTACT:

Kena Kay Cooper
SIGNATURE OF CONTACT

8/30/01
DATE

CELL NUMBER MATERIAL WAS PLACE IN LANDFARM: B-1

NAME OF TRANSPORTER (DRIVER):

W. Smith
SIGNATURE OF DRIVER

8/30/01
DATE

DISPOSAL SITE

South Monument Surface Waste Facility
P. O. Box 418
Hobbs, NM 88241-0418
Sec 25 T20S R36E N/2NE/4

"As a condition of acceptance for disposal, I hereby certify that this waste is an exempt waste as defined by the Environmental Protection Agency (EPA). The waste are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C regulations; and not mixed with non-exempt waste."

Kena Kay Cooper
FACILITY REPRESENTATIVE

8/30/01
DATE

SOUTH MONUMENT SURFACE WASTE FACILITY

TICKET NO # 4449

LEASE OPERATOR CHRIS RODRIGUEZ
Rice Operating Corporation
ORIGINATING LOCATION: 36E
Sec 36 T19S R36E

TRANSPORTER NAME & ADDRESS

WALTON CONSTRUCTION CO., INC.
P. O. BOX 478
HOBBS, NM 88241-0478
Attn: KENA KAY COOPER

DESCRIPTION OF WASTE QUANTITY
Non-Hazardous Hydrocarbons 12 y.R.O.S.

FACILITY CONTACT: [Signature]
SIGNATURE OF CONTACT DATE 8/30/01

CELL NUMBER MATERIAL WAS PLACE IN LANDFARM: B-1

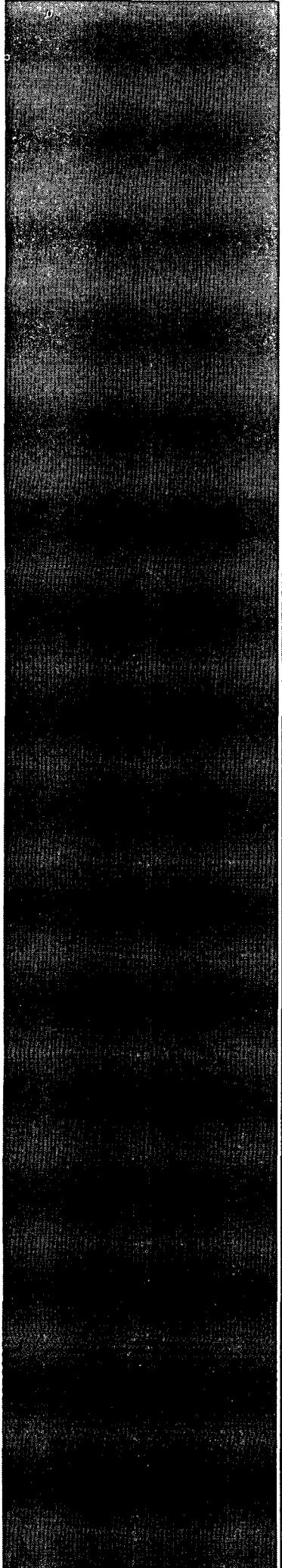
NAME OF TRANSPORTER (DRIVER):
[Signature]
SIGNATURE OF DRIVER DATE 8/30/01

DISPOSAL SITE

South Monument Surface Waste Facility
P. O. Box 418
Hobbs, NM 88241-0418
Sec 25 T20S R36E N/2NE/4

"As a condition of acceptance for disposal, I hereby certify that this waste is an exempt waste as defined by the Environmental Protection Agency (EPA). The waste are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C regulations; and not mixed with non-exempt waste."

[Signature]
FACILITY REPRESENTATIVE DATE 8/30/01



Current Photodocumentation

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

EME C-1-1 (1R427-110)

UL/C, Section 1, T20S, R36E



Facing north

3/13/2013



Facing west

3/13/2013