

1R - 427-64

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, May 09, 2013 2:56 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 (1R427-64) Termination - ROC EME L-18 Site

**RE: Termination Request
for the Rice Operating Company's
EME L-18 Site
Unit Letter L, Section 18, T19S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-64) 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 22, 2013 (received April 24, 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 (1R427-64) 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 9354

RECEIVED

April 22, 2013

APR 24 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-18 (1R427-64): UL/L, Sec. 18, T19S, 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 2002, ROC initiated work on the former L-18 junction box. The site is located in UL/L, Sec. 18, T19S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 64 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating an 18x15x8 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 115 mg/kg, a gasoline range organics (GRO) concentration below detectable limits and a diesel range organics (DRO) concentration of 88 mg/kg. The bottom composite sample resulted in a chloride concentration of 125 mg/kg, a GRO concentration below detectable limits and a DRO concentration of 67 mg/kg. Both samples were analyzed for BTEX, resulting in concentrations below detectable limits throughout.

A total of 20 cubic yards of excavated soil was properly disposed of at a NMOCD facility. A compacted clay layer was installed and will provide a barrier that will inhibit the downward migration of chlorides to groundwater. The excavation was backfilled with

blended soil and a new, watertight junction was installed over the site and has thus been eliminated since. The site is located next to a lease road; therefore, seeding is not required

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

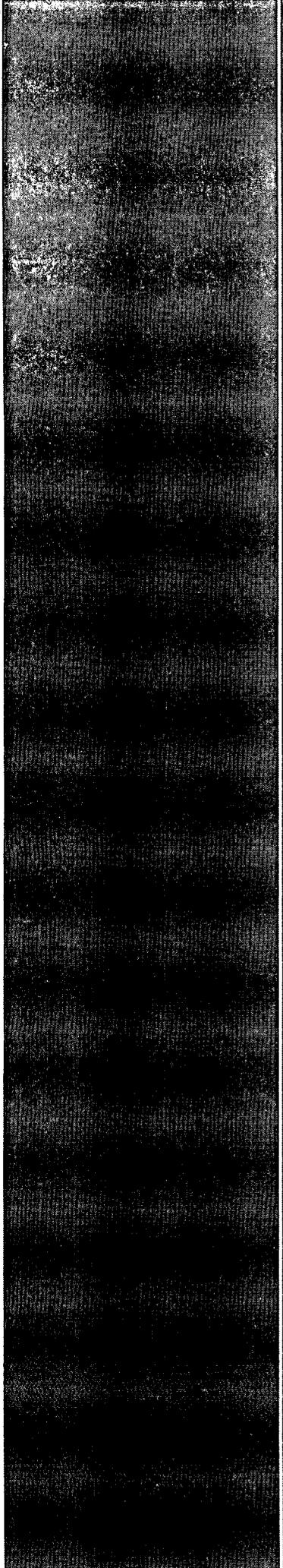
Sincerely,
RICE Operating Company



Hack Conder
Environmental Manager

enclosures

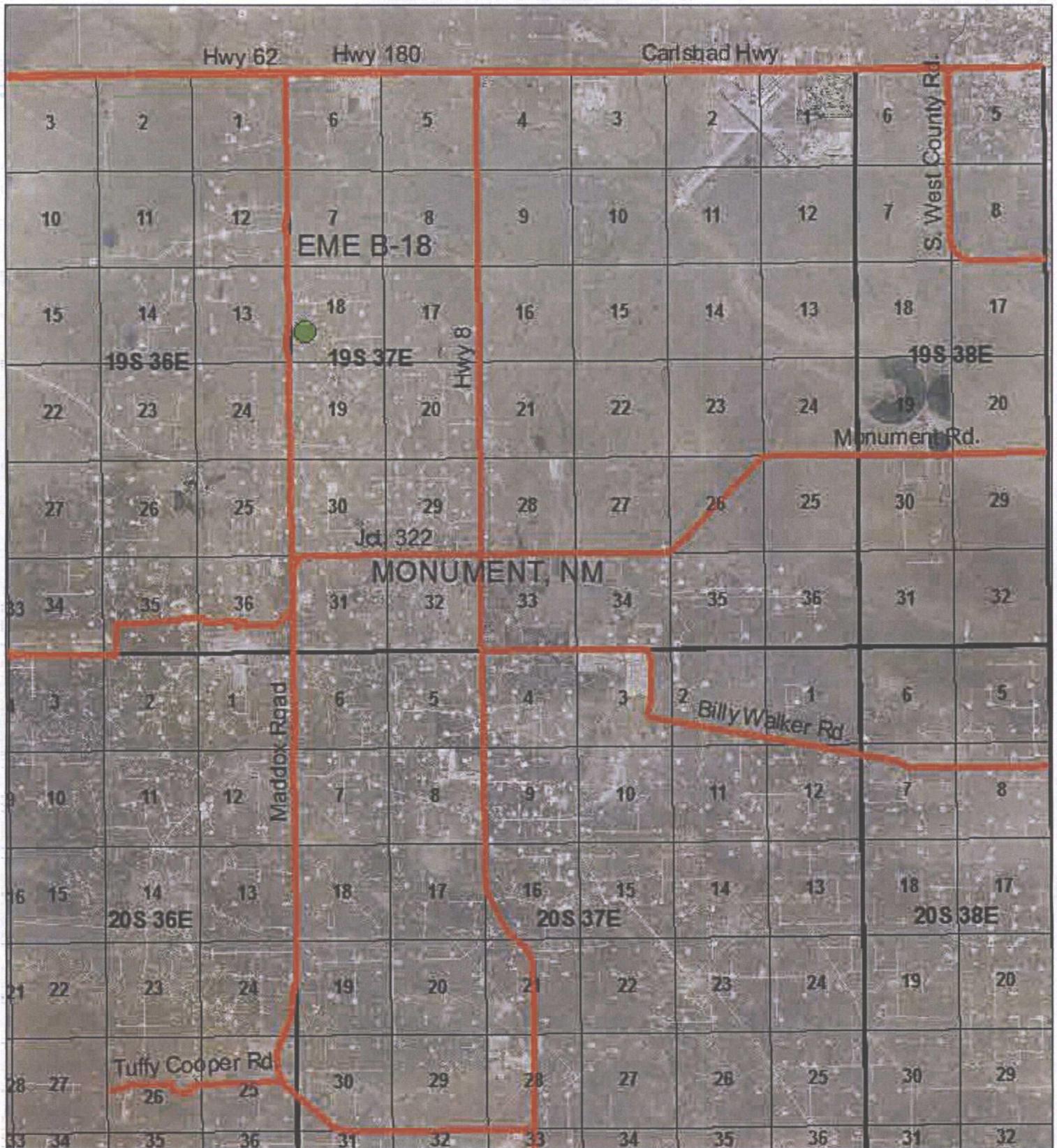
RECEIVED OGD
2013 APR 24 P 2:24



Site Location Map

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

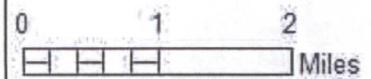
Site Location Map



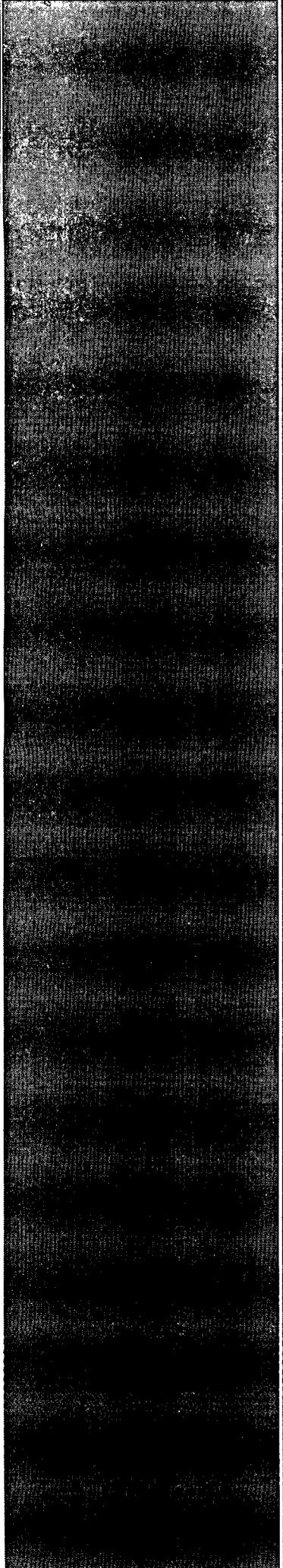
EME L-18

Unit Letter L, Section 18,
T19S, R37E
Lea County, NM

NMOCD Case #: 1R427-64



Drawing date: 4/17/2013



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-18	L	18	19S	37E	LEA	10	8	5

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER JIMMIE T COOPER OTHER _____

Depth to Groundwater 64 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 02/11/2002 Date Completed 02/12/2002 OCD Witness NO

Soil Excavated 60 cubic yards Excavation Length 18 Width 15 Depth 8 feet

Soil Disposed 20 cubic yards Offsite Facility C&C LANDFARM Location MONUMENT, NM

FINAL ANALYTICAL RESULTS: Sample Date 02/12/2002 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	<0.025	<0.025	<0.025	<0.025	<10	88	115
BOTTOM	<0.025	<0.025	<0.025	<0.025	<10	67	125

General Description of Remedial Action: Delineated vertical and lateral extent to below

NMOCD guidelines. Installed compacted clay barrier to vertical transmissivity and a water tight junction box. Backfilled with blended topsoil. Natural attenuation will remediate the remaining hydrocarbon.

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS	7'	150
BOTTOM	8'	200

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

DATE February 19, 2002

PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson*

TITLE Project Leader - Environmental

ENVIRONMENTAL LAB OF I, LTD.

"Don't Treat Your Soil Like Dirt!"

RE ENVIRONMENTAL
ATTN: DEREK ROBINSON
P.O. BOX 13418
ODESSA, TEXAS 79768-3418
FAX: 366-0804
FAX: 505-397-1471 (Donnie Anderson)

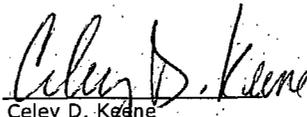
Sample Type: Soil
Sample Condition: Intact/ Iced/ 12.0 deg C
Project Name: Rice Operating
Project #: None Given
Project Location: L-18

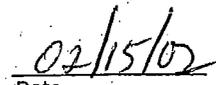
Sampling Date: See Below
Receiving Date: 02/12/02
Analysis Date: 02/12/02

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg	SAMPLE DATE
0202587-01	5 pt Bottom Comp. @ 8'	<10	67	02/12/02
0202587-02	4 pt Wall Comp. @ 7'	<10	88	02/11/02

QUALITY CONTROL	584	585
TRUE VALUE	500	500
% INSTRUMENT ACCURACY	117	117
SPIKED AMOUNT	476	476
ORIGINAL SAMPLE	1170	1160
SPIKE	1580	1510
SPIKE DUP	1570	1690
% EXTRACTION ACCURACY	84	111
BLANK	<10	<10
RPD	0.63	11.2

Methods: SW 846-8015M


Celey D. Keene
Raland K. Tuttle


Date

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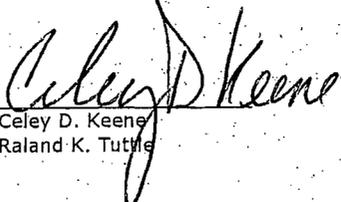
Sample Type: Soil
Sample Condition: Intact/ Iced/ 12.0 deg C
Project Name: Rice Operating
Project #: None Given
Project Location: L-18

Sampling Date: See Below
Receiving Date: 02/12/02
Analysis Date: 02/13/02

ELT#	FIELD CODE	Chloride mg/kg	SAMPLE DATE
0202587-01	5 pt Bottom Comp. @ 8'	125	02/12/02
0202587-02	4 pt Wall Comp. @ 7'	115	02/11/02

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	625
ORIGINAL SAMPLE	310
SPIKE	942
SPIKE DUP	930
% EXTRACTION ACCURACY	99
BLANK	<5.00
RPD	1.28

Methods: SW 846-9253


Celey D. Keene
Raland K. Tuttle


Date 02/14/02

ENVIRONMENTAL LAB OF I, LTD.

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FAX: 366-0804
FAX: 505-397-1471 (Donnie Anderson)

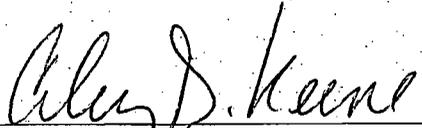
Sample Type: Soil
Sample Condition: Intact/ Iced/ 12.0 deg C
Project Name: Rice Operating
Project #: None Given
Project Location: L-18

Sampling Date: See Below
Receiving Date: 02/12/02
Analysis Date: 02/12/02

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg	SAMPLE DATE
0202587-01	5 pt Bottom Comp. @ 8'	<0.025	<0.025	<0.025	<0.025	<0.025	02/12/02
0202587-02	4 pt Wall Comp. @ 7'	<0.025	<0.025	<0.025	<0.025	<0.025	02/11/02

QUALITY CONTROL	0.111	0.112	0.105	0.226	0.101
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% INSTRUMENT ACCURACY	111	112	105	113	101
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	<0.025	<0.025	0.040	0.243	<0.025
SPIKE	0.113	0.114	0.114	0.236	0.106
SPIKE DUP	0.111	0.113	0.115	0.240	0.107
% EXTRACTION ACCURACY	111	113	113	115	107
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025
RPD	1.78	0.88	0.89	1.68	0.94

METHODS: EPA SW 846-8021B ,5030



Celey D. Keene
Raland K. Tuttle



Date

C & C LANDFARM, INC.

BOX 55

MONUMENT, NEW MEXICO 88265

PHONE: (505) 397-2045

(505) 397-2860

(505) 392-2236

001823

COMPANY NAME Rice Open Co.

COMPANY REPRESENTATIVE NAME Donnie Anderson

LEASE NAME L-18 Junction

SEC.

TOWNSHIP

RANGE

TRUCKING COMPANY NAME R.E. Enrie

DRIVERS SIGNATURE Quik Palmer

TYPE OF MATERIAL BEING HAULED AND QUANTITY 20 yds

Coat Soil

COPY OF ANALYSIS ATTACHED, IF REQUIRED Below 10,000

TPHC _____

BENZENE _____

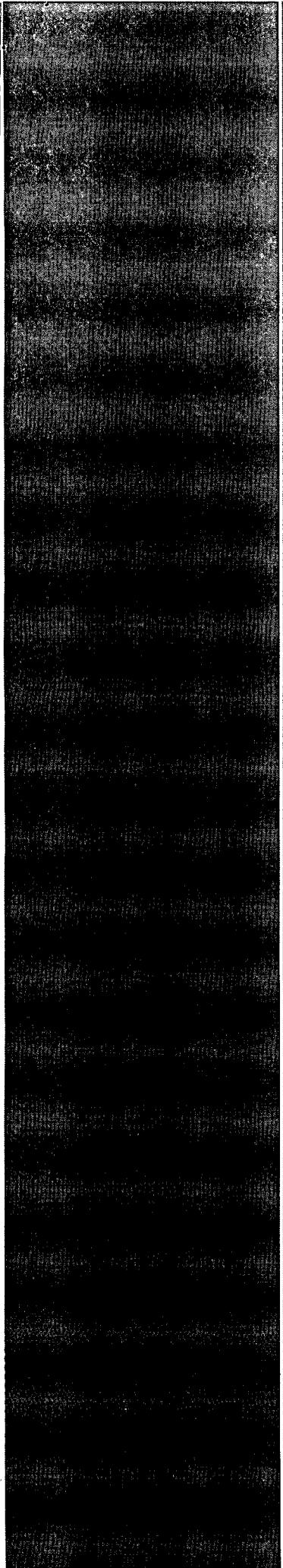
TOLUENE _____

ETHYL BENZENE _____

PARA XYLENE _____

ATTENDANT ON DUTY Jim Cooper

DATE 2-12-02



Current Photodocumentation

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

EME L-18 (1R427-64)

UL/L, Section 18, T19S, R37E



Facing northwest

3/22/2013



Facing south

3/22/2013