1R - 427-72

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, May 15, 2013 11:17 AM
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 (1R427-72) Termination - ROC EME G-32 Site

RE: Termination Request
for the Rice Operating Company's
EME G-32 Site
Unit Letter G, Section 32, T19S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-72) 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 (1R427-72) 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

April 22, 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 G-32 (1R427-72): UL/G, Sec. 32, 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 G-32 junction box. The site is located in UL/G, Sec. 32, T19S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 28 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 20x20x7 ft deep excavation. Each sample was field titrated for chlorides, resulting in chloride concentrations that decreased with depth. The 11 ft samples was sent to a commercial laboratory for analysis of chloride, TPH and BTEX, resulting in a chloride concentration of 334 mg/kg and concentrations of gasoline range organics (GRO), diesel range organics (DRO) and BTEX below detectable limits. 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 354 mg/kg, GRO concentration below detectable limits and a DRO concentration of 27.9 mg/kg. The bottom composite sample resulted in a chloride concentration of 149 mg/kg, a GRO concentration below detectable limits and a DRO concentration of 51.6 mg/kg. Both samples were analyzed for BTEX, resulting in below detectable limits throughout. A total for 84 cubic yards of excavated soil was properly disposed of at a NMOCD facility. Vegetation has rebounded at the site, so no re-vegetation efforts are needed. Vegetation

above the liner 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 needed at the site.

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.

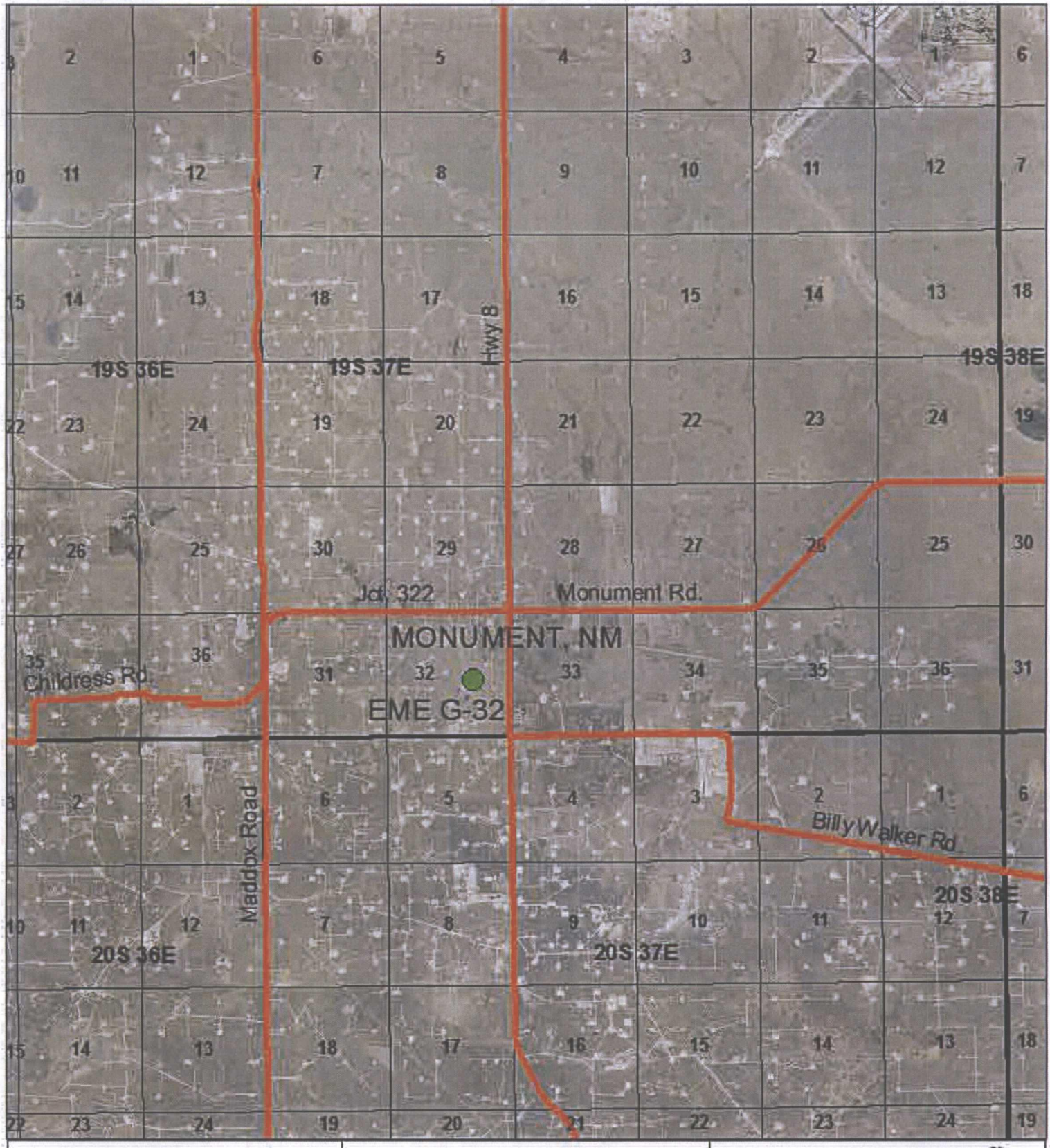
Sincerely,
RICE Operating Company

Hack Conder
Environmental Manager

enclosures

Site Location Map

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



RICE ENVIRONMENTAL CONSULTING & SAFETY, LLC

RECS

EME G-32
(1R427-72)

Unit Letter G, Section 32
T19S, R37E
Lea County, NM

N
W E
S

0 1 2 Miles

Drawing date: 3/21/13
Drafted by: Traci Jennings

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	G-32	G	32	19S	37E	LEA			

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER ED JOHNSTON OTHER _____

Depth to Groundwater 28 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 03/13/2002 Date Completed 03/14/2002 OCD Witness NO

Soil Excavated 100 cubic yards Excavation Length 20 Width 20 Depth 7 feet

Soil Disposed 84 cubic yards Offsite Facility J&L LANDFARM Location MONUMENT, NM

FINAL ANALYTICAL RESULTS: **Sample Date** 03/13/2002 **Sample Depth** 7'

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	27.9	354
BOTTOM	<0.025	<0.025	<0.025	<0.025	<50	51.6	149
Vertical @ 11'	<0.025	<0.025	<0.025	<0.025	<10	<10	334

General Description of Remedial Action: Delineated vertical and lateral extent.

Vertical trench @ 11' found 38 ppm TPH and 250 ppm chlorides. Installed a compacted clay barrier. This site is no longer a junction and does not require a box. Backfilled with clean soil. Natural attenuation will remediate the remaining hydrocarbon.

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS	6'	1000
BOTTOM	7'	1200
Vertical trench	7'	200
	9'	200
	11'	250

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

DATE May 16,2002 PRINTED NAME D. E. Anderson

SIGNATURE D E Anderson TITLE Project Leader - Environmental

ANALYTICAL REPORT

Prepared for:

Derek Robinson
RE Environmental
P.O. Box 13418
Odessa, TX 79764

G-37

Project:	Rice
Order#:	G0202823
Report Date:	03/20/2002

Certificates
US EPA Laboratory Code TX00158

ENVIRONMENTAL LAB OF TEXAS

SAMPLE WORK LIST

RE Environmental
P.O. Box 13418
Odessa, TX 79764
366-0804

Order#: G0202823
Project:
Project Name: Rice
Location: G-32

The samples listed below were submitted to Environmental Lab of Texas and were received under chain of custody. Environmental Lab of Texas makes no representation or certification as to the method of sample collection, sample identification, or transportation/handling procedures used prior to the receipt of samples by Environmental Lab of Texas.

Lab ID:	Sample :	Matrix:	Date / Time Collected	Date / Time Received	Container	Preservative
0202823-01	Vert. @ 11'	SOIL	03/13/2002 11:00	03/13/2002 16:30	4 oz glass	Ice
	Lab Testing:	**Rejected:** No		**Temp:** 15.5 C		
	8015M TPH GRO/DRO					
	8021B/5030 BTEX					
	Chloride					
0202823-02	4 pt. Wall Comp. @ 6'	SOIL	03/13/2002 13:00	03/13/2002 16:30	4 oz glass	Ice
	Lab Testing:	**Rejected:** No		**Temp:** 15.5 C		
	8015M TPH GRO/DRO					
	8021B/5030 BTEX					
	Chloride					
0202823-03	5 pt. Bottom Comp. @ 7'	SOIL	03/13/2002 14:00	03/13/2002 16:30	4 oz glass	Ice
	Lab Testing:	**Rejected:** No		**Temp:** 15.5 C		
	8015M TPH GRO/DRO					
	8021B/5030 BTEX					
	Chloride					

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Derek Robinson
RE Environmental
P.O. Box 13418
Odessa, TX 79764

Order#: G0202823
Project:
Project Name: Rice
Location: G-32

Lab ID: 0202823-01
Sample ID: Vert. @ 11'

8015M TPH GRO/DRO

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
		03/14/2002 15:33	1	1	CK	8015M

Parameter	Result mg/kg	RL
GRO, C6-C12	<10	10.0
DRO, >C12-C28	<10	10.0
Total C6-C28	<10	10.0

8021B/5030 BTEX

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
0000910-02		03/18/2002 10:00	1	25	CK	8021B

Parameter	Result µg/kg	RL
Benzene	<25.0	25.0
Ethylbenzene	<25.0	25.0
Toluene	<25.0	25.0
p/m-Xylene	<25.0	25.0
o-Xylene	<25.0	25.0

Lab ID: 0202823-02
Sample ID: 4 pt. Wall Comp. @ 6'

8015M TPH GRO/DRO

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
		03/14/2002 15:45	1	1	CK	8015M

Parameter	Result mg/kg	RL
GRO, C6-C12	<10	10.0
DRO, >C12-C28	27.9	10.0
Total C6-C28	27.9	10.0

DL = Diluted out N/A = Not Applicable RL = Reporting Limit

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Derek Robinson
RE Environmental
P.O. Box 13418
Odessa, TX 79764

Order#: G0202823
Project:
Project Name: Rice
Location: G-32

Lab ID: 0202823-02
Sample ID: 4 pt. Wall Comp. @ 6'

8021B/5030 BTEX

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
0000910-02		03/18/2002 14:25	1	25	CK	8021B

Parameter	Result µg/kg	RL
Benzene	<25.0	25.0
Ethylbenzene	<25.0	25.0
Toluene	<25.0	25.0
p/m-Xylene	<25.0	25.0
o-Xylene	<25.0	25.0

Lab ID: 0202823-03
Sample ID: 5 pt. Bottom Comp. @ 7'

8015M TPH GRO/DRO

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
		03/14/2002 15:55	1	5	CK	8015M

Parameter	Result mg/kg	RL
GRO, C6-C12	<50	50.0
DRO, >C12-C28	51.6	50.0
Total C6-C28	51.6	50.0

DL = Diluted out N/A = Not Applicable RL = Reporting Limit

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Derek Robinson		Order#:	G0202823
RE Environmental		Project:	
P.O. Box 13418		Project Name:	Rice
Odessa, TX 79764		Location:	G-32

Lab ID: 0202823-03
Sample ID: 5 pt. Bottom Comp. @ 7'

8021B/5030 BTEX

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
0000910-02		03/18/2002 14:47	1	25	CK	8021B

Parameter	Result µg/kg	RL
Benzene	<25.0	25.0
Ethylbenzene	<25.0	25.0
Toluene	<25.0	25.0
p/m-Xylene	<25.0	25.0
o-Xylene	<25.0	25.0

Approval: Raland K. Tuttle, Lab Director, QA Officer — Date 3-20-02

Celey D. Keene, Org. Tech. Director
Jeanne McMurrey, Inorg. Tech. Director
Irene Perry, QA Assistant
Sandra Biezugbe, Lab Tech.
Curt Cowdrey, Lab Tech.
Sara Molina, Lab Tech.

DL = Diluted out N/A = Not Applicable RL = Reporting Limit

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Derek Robinson		Order#:	G0202823
RE Environmental		Project:	
P.O. Box 13418		Project Name:	Rice
Odessa, TX 79764		Location:	G-32

Lab ID: 0202823-01
Sample ID: Vert. @ 11'

Test Parameters

Parameter	Result	Units	Dilution Factor	RL	Method	Date Analyzed	Analyst
Chloride	334	mg/kg	1	5.00	9253	03/18/2002	SB

Lab ID: 0202823-02
Sample ID: 4 pt. Wall Comp. @ 6'

Test Parameters

Parameter	Result	Units	Dilution Factor	RL	Method	Date Analyzed	Analyst
Chloride	354	mg/kg	1	5.00	9253	03/18/2002	SB

Lab ID: 0202823-03
Sample ID: 5 pt. Bottom Comp. @ 7'

Test Parameters

Parameter	Result	Units	Dilution Factor	RL	Method	Date Analyzed	Analyst
Chloride	149	mg/kg	1	5.00	9253	03/18/2002	SB

Approval: Raland K Tuttle 3-20-02
Raland K. Tuttle, Lab Director, QA Officer — Date
Celey D. Keene, Org. Tech. Director
Jeanne McMurrey, Inorg. Tech. Director
Irene Perry, QA Assistant
Sandra Biezugbe, Lab Tech.
Curt Cowdrey, Lab Tech.
Sara Molina, Lab Tech.

RL = Reporting Limit N/A = Not Applicable

ENVIRONMENTAL LAB OF TEXAS I, LTD. 12600 West I-20 East, Odessa, TX 79765 Ph: 915-563-1800

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

8015M TPH GRO/DRO

Order#: G0202823

BLANK	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Total C6-C28-mg/kg	0000871-02			<10		
MS	**LAB-ID #**	**Sample Concentr.**	**Spike Concentr.**	**QC Test Result**	**Pct (%) Recovery**	**RPD**
Total C6-C28-mg/kg	0202809-05	0	952	942	98.9%	
MSD	**LAB-ID #**	**Sample Concentr.**	**Spike Concentr.**	**QC Test Result**	**Pct (%) Recovery**	**RPD**
Total C6-C28-mg/kg	0202809-05	0	952	940	98.7%	0.2%
SRM	**LAB-ID #**	**Sample Concentr.**	**Spike Concentr.**	**QC Test Result**	**Pct (%) Recovery**	**RPD**
Total C6-C28-mg/kg	0000871-05		1000	1039	103.9%	0.%

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

8021B/5030 BTEX

Order#: G0202823

BLANK	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene-µg/kg	0000910-02			<25.0		
Ethylbenzene-µg/kg	0000910-02			<25.0		
Toluene-µg/kg	0000910-02			<25.0		
p/m-Xylene-µg/kg	0000910-02			<25.0		
o-Xylene-µg/kg	0000910-02			<25.0		
MS	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene-µg/kg	0202823-02	0	100	99.5	99.5%	
Ethylbenzene-µg/kg	0202823-02	0	100	102	102.%	
Toluene-µg/kg	0202823-02	0	100	102	102.%	
p/m-Xylene-µg/kg	0202823-02	0	200	211	105.5%	
o-Xylene-µg/kg	0202823-02	0	100	100	100.%	
MSD	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene-µg/kg	0202823-02	0	100	96.7	96.7%	2.9%
Ethylbenzene-µg/kg	0202823-02	0	100	98.6	98.6%	3.4%
Toluene-µg/kg	0202823-02	0	100	98.6	98.6%	3.4%
p/m-Xylene-µg/kg	0202823-02	0	200	205	102.5%	2.9%
o-Xylene-µg/kg	0202823-02	0	100	98	98.%	2.%
SRM	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene-µg/kg	0000910-05		100	98.8	98.8%	0.%
Ethylbenzene-µg/kg	0000910-05		100	102	102.%	0.%
Toluene-µg/kg	0000910-05		100	102	102.%	0.%
p/m-Xylene-µg/kg	0000910-05		200	210	105.%	0.%
o-Xylene-µg/kg	0000910-05		100	100	100.%	0.%

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

Test Parameters

Order#: G0202823

BLANK	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg	0000902-01			<5.00		
CONTROL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg	0000902-02		5000	5050	101.%	
MS	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg	0202812-01	886	556	1450	101.4%	
MSD	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg	0202812-01	886	556	1460	103.2%	0.7%

Environmental Lab of Texas, Inc.

2600 West I-20 East
Odessa, Texas 79763
Phone: 915-563-1800
Fax: 915-563-1713

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: Derek Robinson
Company Name: RE Environmental
Company Address:
City/State/Zip:
Telephone No:
Fax No:
Sampler Signature:

Project Name: Rice
Project #:
Project Loc: G-32
PO #:

LAB # (lab use only)	FIELD CODE	Date Sampled	Time Sampled	No. of Containers	Preservative: Ice	Preservative: HNO3	Preservative: HCl	Preservative: NaOH	Preservative: H2SO4	Preservative: None	Preservative: Other (Specify)	Matrix: Water	Matrix: Sludge	Matrix: Soil	Matrix: Other (specify)	Analyze For: TCLP: TOTAL: TDS (EPA SAR / EC)	TPH 418.1	TPH TX 1005/1006	TPH 8015M GRO/DRO	Metals: As Ag Ba Cd Cr Pb Hg Se	Volatiles	Semivolatiles	BTEX 8021B/5030	RUSH TAT (Pre-Schedule)	Standard TAT
0202823-01	Vert. @ 11'	3-13-02	11:00 Am	1	X									X		X			X				X		
02	4pt. Wall Comp. @ 6'	3-13-02	1:00 PM	1	X									X		X			X				X		
03	Spt. Bottom Comp. @ 7'	3-13-02	2:00 Pm	1	X									X		X			X				X		

Special Instructions:
Fax Results to Dennie Anderson & Derek Robinson

Relinquished by:	Date	Time	Received by:	Date	Time
	3-13-02	4:30 PM			
Relinquished by:	Date	Time	Received by ELOT:	Date	Time
				3-13-02	1630

Sample Containers Intact? Y N
Temperature Upon Receipt:
Laboratory Comments:
RK 15.5 °C

J & L LANDFARM, INC.
P.O. BOX 356
HOBBS, NEW MEXICO 88241-0356
PHONE (505) 393-9697 • PERMIT # NM-01-0023

Make it last

0226

Generator/Company RICE OPERATING CO.

Authorized Representative DONNIE ANDERSON

Originating Site G-32
S-32 T 19S R-37E

Transporter R&E CONSTRUCTION

Authorized Representative Dan Robinson

Brief Description of Material NON HAZ SOIL

Estimated Volume 84 yards

TPH SEE TEST

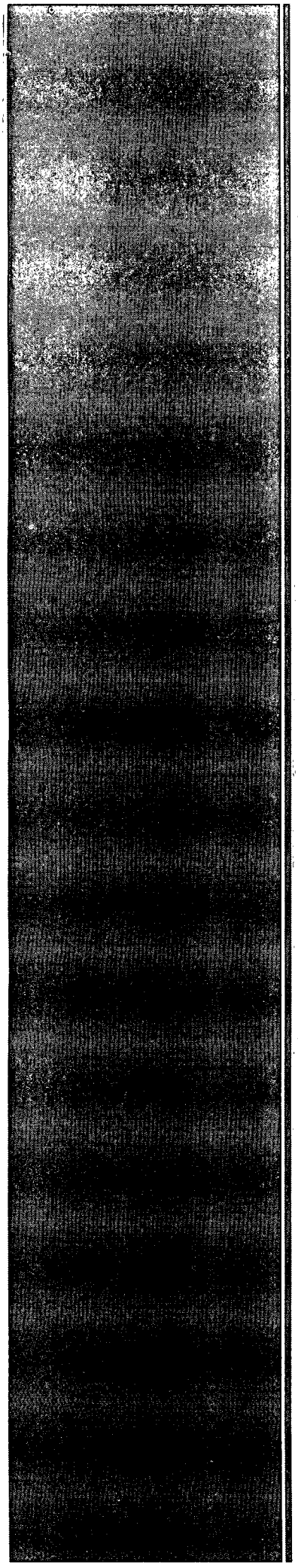
BE-TEX 1 - 1 -

CERTIFICATE OF CHEMICAL ANALYSIS (if required) N/A

Lee M. Roberts
FACILITY AUTHORIZED REPRESENTATIVE

MARCH 14, 2002
DATE

B-3186



Current Photodocumentation

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

EME G-32 (1R427-72)

UL/G, Section 32, T19S, R37E

Facing south 3/20/2013

Facing west 3/20/2013