

1R - 427-70

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, June 19, 2013 5:11 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 (1R427-70) Termination - ROC EME J-2 Site

**RE: Termination Request
for the Rice Operating Company's
EME J-2 Site
Unit Letter J, Section 2, T20S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-70) 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 June 12, 2013 (received June 14, 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 (1R427-70) 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*

122 West Taylor • Hobbs, New Mexico 88240

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

RECEIVED OCD

2013 JUN 14 P 2: 05

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8883

June 12, 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 J-2 (1R427-70): UL/J, Sec. 2, 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 2002, ROC initiated work on the former J-2 junction box. The site is located in UL/J, Sec. 2, T20S, R37E. An updated groundwater survey indicates that there are no water sources within a mile radius and there is no groundwater in the area. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 20x15x5 ft deep excavation. Each sample was field titrated for chlorides, resulting in chloride concentrations that decreased with depth. Representative samples of the sidewalls and bottom were collected and sent to a commercial laboratory for analysis of chloride and TPH, resulting in a sidewall chloride concentration of 598 mg/kg and a gasoline range organics (GRO) and a diesel range organics (DRO) concentration below detectable limits. The bottom sample resulted in a chloride concentration of 421 mg/kg and concentrations of GRO and DRO below detectable limits. A compacted clay layer was installed and a new water proof junction box was installed. The clay layer will provide a barrier that will inhibit the downward migration of chlorides to groundwater. Vegetation has rebounded at the site so no re-vegetation efforts are needed. The water proof junction box has since been eliminated.

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

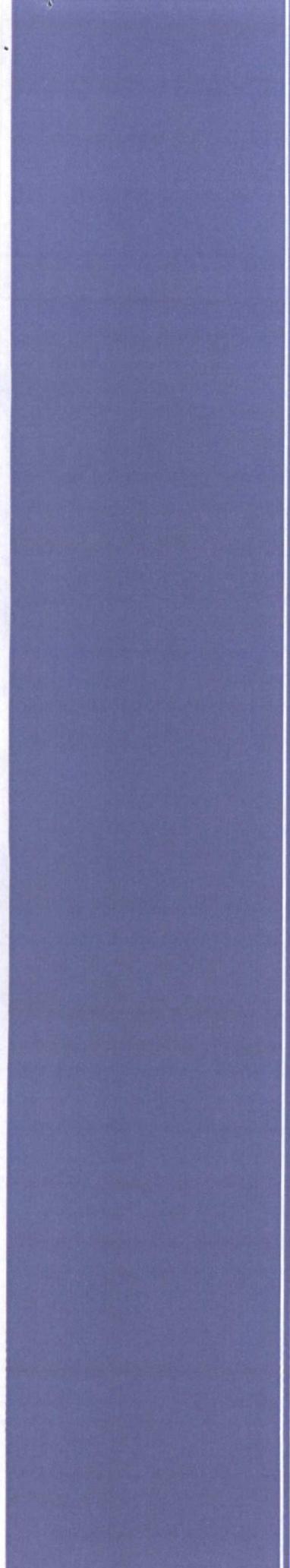
Please contact me at (575)393-9174 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,
RICE Operating Company

A handwritten signature in black ink, appearing to read "H. Conder", written in a cursive style.

Hack Conder
Environmental Manager

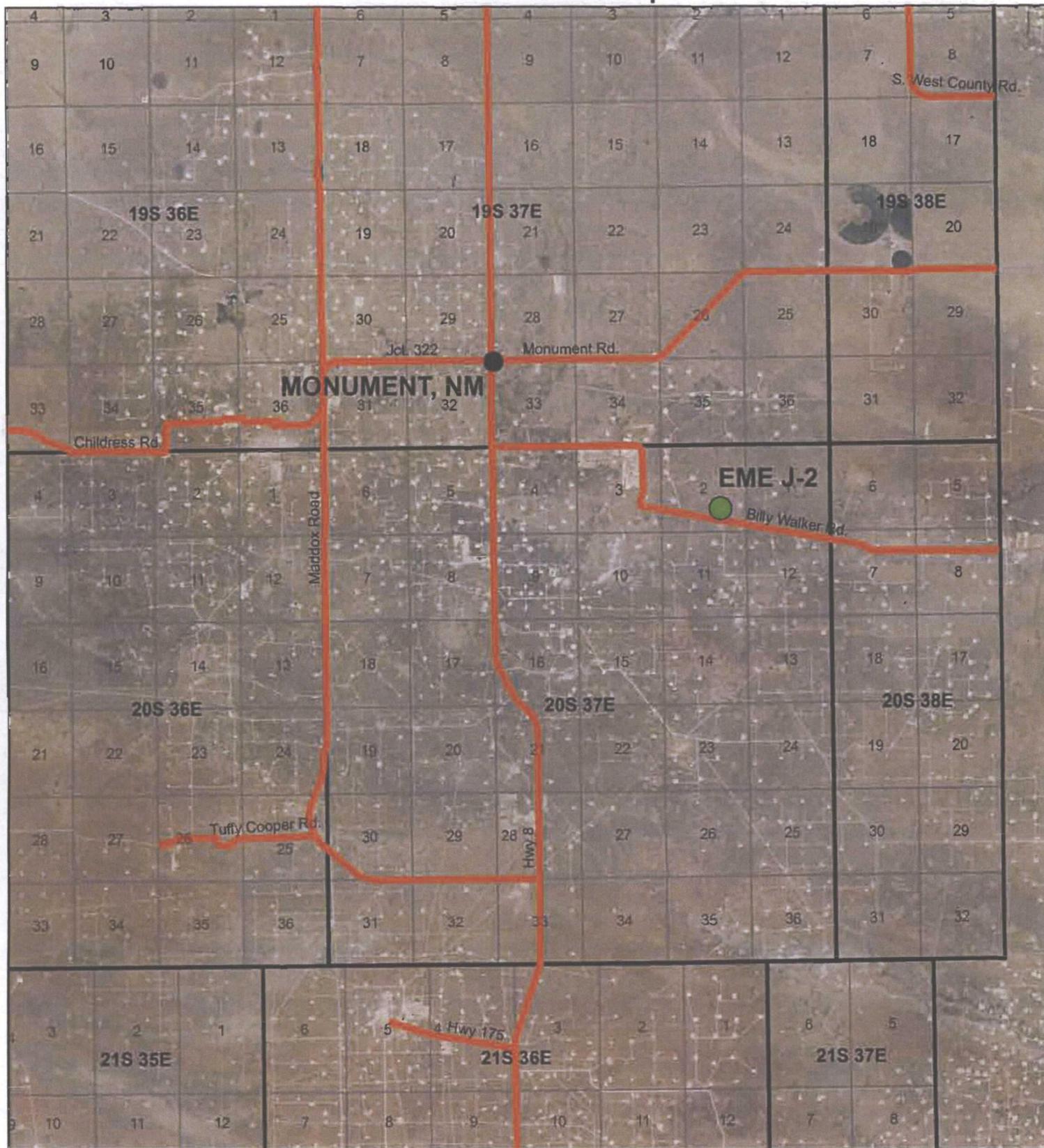
enclosures



Site Maps

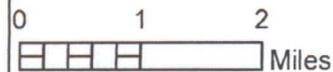
RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471

Site Location Map



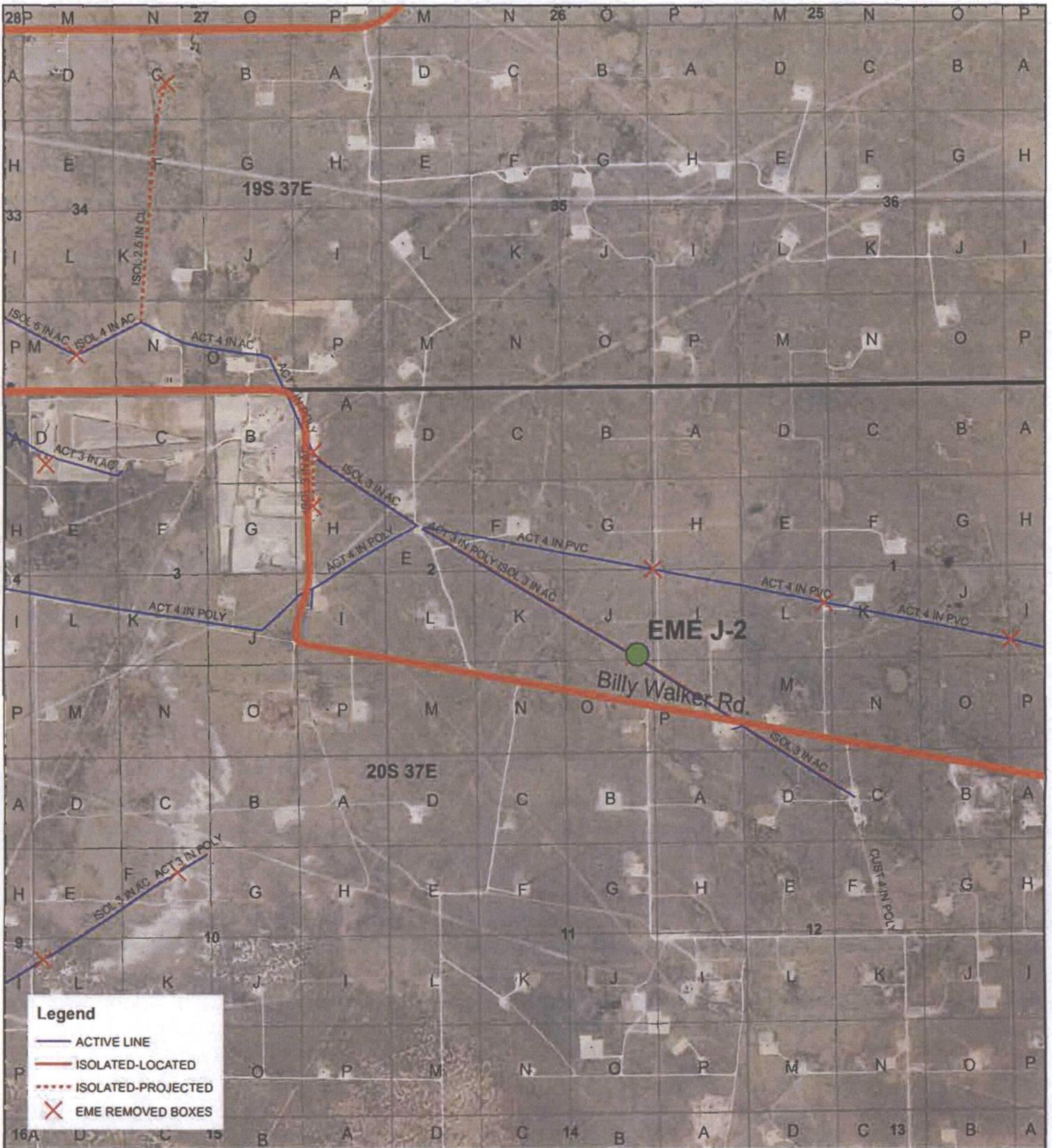
EME J-2 (1R427-70)

UL/J SECTION 2
T20S, R37E
LEA COUNTY, NM



Drawing date: 5/6/13 LS

Area Map



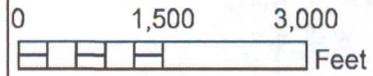
Legend

- ACTIVE LINE
- ISOLATED-LOCATED
- ⋯ ISOLATED-PROJECTED
- X EME REMOVED BOXES

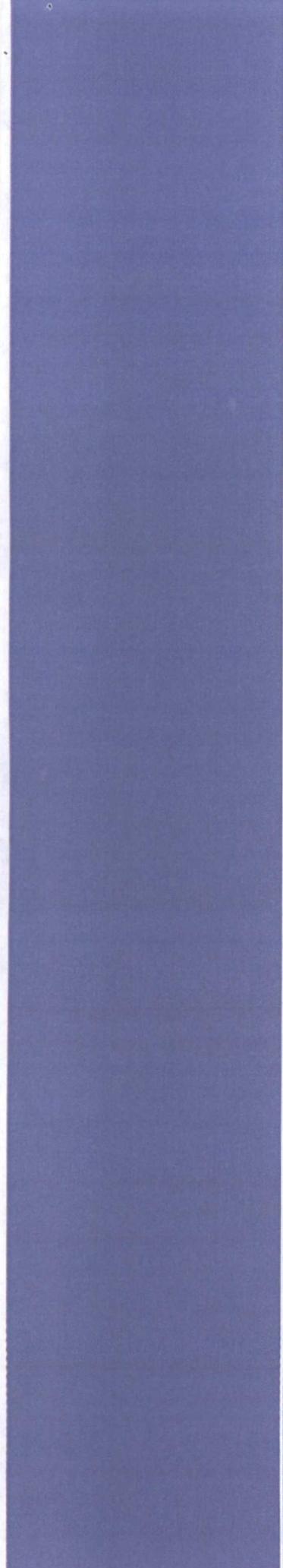


EME J-2 (1R427-70)

UL/J SECTION 2
T20S, R37E
LEA COUNTY, NM



Drawing date: 5/3/13 LS



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	J-2	J	2	20S	37E	LEA	10	8	4

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

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

Date Started 04/18/2002 Date Completed 04/19/2002 OCD Witness NO

Soil Excavated 40 cubic yards Excavation Length 20 Width 15 Depth 5' feet

Soil Disposed _____ cubic yards Offsite Facility _____ Location _____

FINAL ANALYTICAL RESULTS: Sample Date 04/18/2002 Sample Depth 5'

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	<10	598
BOTTOM	<0.025	<0.025	<0.025	<0.025	<10	<10	421

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

Found impact below NMOCD guidelines. Installed a compacted clay barrier and water proof junction box. Backfilled with blended soil.

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS	4'	500
BOTTOM	5'	450
Vertical trench	6'	50

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

DATE May 17, 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 79768

Project: Rice Operating J-2

Order#: G0203121

Report Date: 04/26/2002

Certificates

US EPA Laboratory Code TX00158

ENVIRONMENTAL LAB OF TEXAS

SAMPLE WORK LIST

RE ENVIRONMENTAL
P.O. BOX 13418
ODESSA, TX 79768
366-0804

Order#: G0203121
Project:
Project Name: Rice Operating
Location: EME J-2

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.

<u>Lab ID:</u>	<u>Sample :</u>	<u>Matrix:</u>	<u>Date / Time</u> <u>Collected</u>	<u>Date / Time</u> <u>Received</u>	<u>Container</u>	<u>Preservative</u>
0203121-01	4 pt. Comp. Wall@4'	SOIL	4/18/02 11:15	4/19/02 8:00	4 oz Glass	ice
	<u>Lab Testing:</u>	Rejected: No		Temp: 17C		
	8015M					
	8021B/5030 BTEX					
	Chloride					
0203121-02	5 pt Comp. Bottom @5'	SOIL	4/18/02 11:30	4/19/02 8:00	4 oz Glass	ice
	<u>Lab Testing:</u>	Rejected: No		Temp: 17C		
	8015M					
	8021B/5030 BTEX					
	Chloride					

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

DEREK ROBINSON
 RE ENVIRONMENTAL
 P.O. BOX 13418
 ODESSA, TX 79768

Order#: G0203121
 Project:
 Project Name: Rice Operating
 Location: EME J-2

Lab ID: 0203121-01
 Sample ID: 4 pt. Comp. Wall@4'

8015M

<u>Method</u>	<u>Date</u>	<u>Date</u>	<u>Sample</u>	<u>Dilution</u>	<u>Analyst</u>	<u>Method</u>
Blank	Prepared	Analyzed	Amount	Factor	CK	8015M
		4/21/02	1	1		

Parameter	Result mg/kg	RL
DRO, >C12-C35	<10.0	10.0
GRO, C6-C12	<10.0	10.0
TOTAL, C6-C35	<10.0	10.0

8021B/5030 BTEX

<u>Method</u>	<u>Date</u>	<u>Date</u>	<u>Sample</u>	<u>Dilution</u>	<u>Analyst</u>	<u>Method</u>
Blank	Prepared	Analyzed	Amount	Factor	CK	8021B
0001382-02		4/23/02 16:22	1	25		

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: 0203121-02
 Sample ID: 5 pt Comp. Bottom @5'

8015M

<u>Method</u>	<u>Date</u>	<u>Date</u>	<u>Sample</u>	<u>Dilution</u>	<u>Analyst</u>	<u>Method</u>
Blank	Prepared	Analyzed	Amount	Factor	CK	8015M
		4/21/02	1	1		

Parameter	Result mg/kg	RL
DRO, >C12-C35	<10.0	10.0
GRO, C6-C12	<10.0	10.0
TOTAL, C6-C35	<10.0	10.0

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

DEREK ROBINSON
 RE ENVIRONMENTAL
 P.O. BOX 13418
 ODESSA, TX 79768

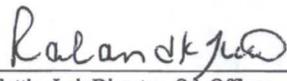
Order#: G0203121
 Project:
 Project Name: Rice Operating
 Location: EME J-2

Lab ID: 0203121-02
 Sample ID: 5 pt Comp. Bottom @5'

8021B/5030 BTEX

<u>Method</u>	<u>Date</u>	<u>Date</u>	<u>Sample</u>	<u>Dilution</u>	<u>Analyst</u>	<u>Method</u>
<u>Blank</u>	<u>Prepared</u>	<u>Analyzed</u>	<u>Amount</u>	<u>Factor</u>		
0001382-02		4/23/02 16:44	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:  4-27-02
 Raland K. Tuttle, Lab Director, QA Officer Date
 Celey D. Keene, Org. Tech. Director
 Jeanne McMurrey, Inorg. Tech. Director
 Sandra Biezugbe, Lab Tech.
 Sara Molina, Lab Tech.

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

DEREK ROBINSON
RE ENVIRONMENTAL
P.O. BOX 13418
ODESSA, TX 79768

Order#: G0203121
Project:
Project Name: Rice Operating
Location: EME J-2

Lab ID: 0203121-01
Sample ID: 4 pt. Comp. Wall@4'

Test Parameters

<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Dilution Factor</u>	<u>RL</u>	<u>Method</u>	<u>Date Analyzed</u>	<u>Analyst</u>
Chloride	598	mg/kg	1	10.0	9253	4/26/02	SB

Lab ID: 0203121-02
Sample ID: 5 pt Comp. Bottom @5'

Test Parameters

<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Dilution Factor</u>	<u>RL</u>	<u>Method</u>	<u>Date Analyzed</u>	<u>Analyst</u>
Chloride	421	mg/kg	1	10.0	9253	4/26/02	SB

Approval: Raland K Tuttle 4-27-02
Raland K. Tuttle, Lab Director, QA Officer Date
Celey D. Keene, Org. Tech. Director
Jeanne McMurrey, Inorg. Tech. Director
Sandra Biezugbe, Lab Tech.
Sara Molina, Lab Tech.

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

8015M

Order#: G0203121

<i>BLANK</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg		0001354-02			<10.0		
<i>MS</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg		0203121-02	0	952	743	78.%	
<i>MSD</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg		0203121-02	0	952	724	76.1%	2.6%
<i>SRM</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg		0001354-05		1000	829	82.9%	

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

8021B/5030 BTEX

Order#: G0203121

BLANK		LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
SOIL							
	Benzene-μg/kg	0001382-02			<25.0		
	Ethylbenzene-μg/kg	0001382-02			<25.0		
	Toluene-μg/kg	0001382-02			<25.0		
	p/m-Xylene-μg/kg	0001382-02			<25.0		
	o-Xylene-μg/kg	0001382-02			<25.0		
MS		LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
SOIL							
	Benzene-μg/kg	0203120-01	0	100	102	102.0%	
	Ethylbenzene-μg/kg	0203120-01	0	100	104	104.0%	
	Toluene-μg/kg	0203120-01	0	100	104	104.0%	
	p/m-Xylene-μg/kg	0203120-01	0	200	214	107.0%	
	o-Xylene-μg/kg	0203120-01	0	100	104	104.0%	
MSD		LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
SOIL							
	Benzene-μg/kg	0203120-01	102	100	105	105.0%	2.9%
	Ethylbenzene-μg/kg	0203120-01	104	100	108	108.0%	3.8%
	Toluene-μg/kg	0203120-01	104	100	106	106.0%	1.9%
	p/m-Xylene-μg/kg	0203120-01	214	200	221	110.0%	3.2%
	o-Xylene-μg/kg	0203120-01	104	100	107	107.0%	2.8%
SRM		LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
SOIL							
	Benzene-μg/kg	0001382-05		100	99.2	99.2%	
	Ethylbenzene-μg/kg	0001382-05		100	106	106.0%	
	Toluene-μg/kg	0001382-05		100	114	114.0%	
	p/m-Xylene-μg/kg	0001382-05		200	213	106.5%	
	o-Xylene-μg/kg	0001382-05		100	107	107.0%	

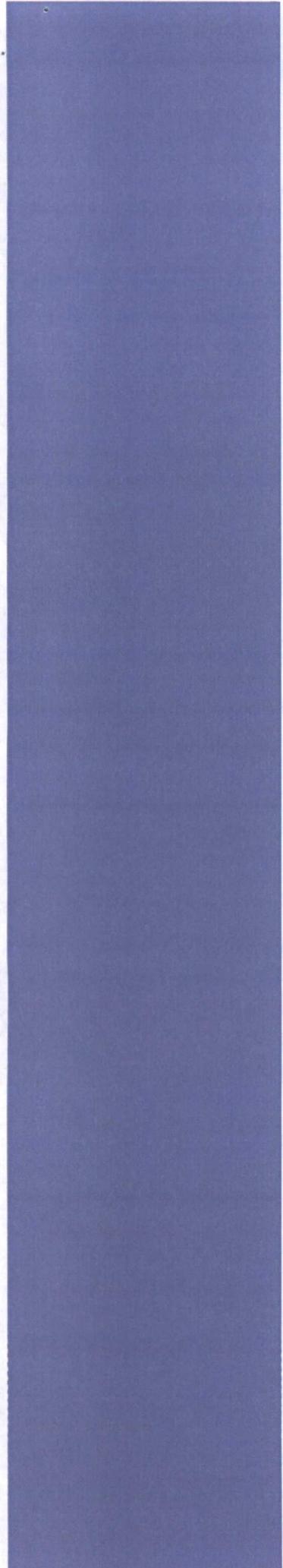
ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

Test Parameters

Order#: G0203121

<i>BLANK</i>		LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg	SOIL	0001412-01			<10.0		
<i>MS</i>		LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg	SOIL	0203120-01	691	500	1200	101.8%	
<i>MSD</i>		LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg	SOIL	0203120-01	691	500	1190	99.8%	0.8%
<i>SRM</i>		LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg	SOIL	0001412-04		5000	5050	101.1%	



Current Photodocumentation

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

EME J-2 (1R427-70)
UL/J, Section 2, T20S, R37E



Facing north

3/26/2013



Facing west

3/26/2013