

1R - 427-334

**APPROVALS**

**YEAR(S):**

2013

**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Wednesday, April 03, 2013 4:09 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 (1R427-334) Termination - ROC EME Jct I-29-2 Site

**RE: Termination Request  
for the Rice Operating Company's  
EME Jct I-29-2 Site  
Unit Letter I, Section 29, T19S, R37E, NMPM, Lea County, New Mexico  
Remediation Plan (1R427-334) 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 March 21, 2013 (received March 27, 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 (1R427-334) 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 9309

**March 21, 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

RECEIVED

MAR 27 2013

4

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

RE: Termination Request  
EME Jct. I-29-2 (1R427-334): UL/I, Sec. 29, 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 2010, ROC initiated work on the former I-29-2 junction box. The site is located in UL/I, Sec. 29, T19S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 30 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x3x10 ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in low concentrations of each. The 10 ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 224 mg/kg, a gasoline range organics (GRO) concentration below detectable limits and a diesel range organics (DRO) concentration of 24.1 mg/kg. The excavated soil was returned to the excavation and contoured to the surrounding area. On 2/5/2010, the site was seeded with a blend of native vegetation. A junction box is no longer needed at the site. Vegetation has rebounded at the site, so no re-vegetation efforts are needed.

The junction box site location map, final report, photodocumentation, laboratory analysis, PID sheet, chloride graph 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", with a long horizontal flourish extending to the right.

Hack Conder  
Environmental Manager

enclosures

RECEIVED OGD  
2003 MAR 27 P 2:17



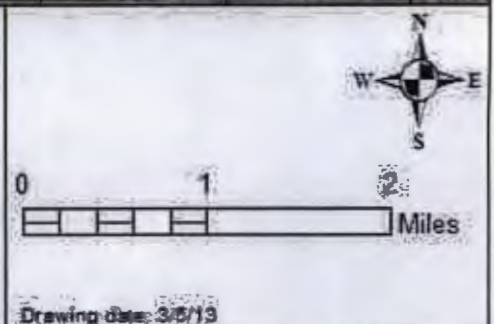
## Site Location Map

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



## EME Jct. I-29-2 (1R427-334)

Unit Letter I, Section 29,  
T19S, R37E  
Lea County, NM





# 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		
Eunice Monument Eumont (EME)	Jct. I-29-2	I	29	19S	37E	Lea	Length	Width	Depth
							Eliminated		

LAND TYPE: BLM \_\_\_\_\_ STATE X FEE LANDOWNER \_\_\_\_\_ OTHER \_\_\_\_\_

Depth to Groundwater 30 feet NMOCD SITE ASSESSMENT RANKING SCORE: 40\*

Date Started 1/29/2010 Date Completed 2/5/2010 OCD Witness no

Soil Excavated 5.6 cubic yards Excavation Length 5 Width 3 Depth 10 feet

Soil Disposed 0 cubic yards Offsite Facility n/a Location n/a

**FINAL ANALYTICAL RESULTS:** Sample Date 1/29/2010 Sample Depth 10 ft.

TPH and Chloride laboratory test results completed by using an approved lab and testing  
procedures pursuant to NMOCD guidelines

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
SOURCE 10' GRAB	0.0	<10.0	24.1	224

**CHLORIDE FIELD TESTS**

LOCATION	DEPTH	mg/kg
background	6"	118
vertical delineation trench at the junction (source)	3'	140
	4'	116
	5'	145
	6'	143
	7'	260
	8'	211
	9'	178
	10'	148

**General Description of Remedial Action:** This junction and line were eliminated under the pipeline replacement/upgrade program. After the former junction was removed, an investigation was conducted using a backhoe to collect soil samples at regular intervals. Chloride field tests were performed on each sample, which yielded low concentrations of chloride similar to that of the background sample. Organic vapors were measured using a PID, which also yielded low concentrations. The deepest sample, 10 ft BGS, was sent to a commercial laboratory for analysis, which confirmed low concentrations of chloride and organics. The excavated soil was returned to the excavation to ground surface and contoured to the surrounding area. On 2/05/2010, site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

\* Residence 885 ft. south

enclosures: photos, lab results, PID (field) screenings, chloride graph

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

SITE SUPERVISOR Jordan Woodfin SIGNATURE *Jordan Woodfin* COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Larry Bruce Baker Jr. INITIAL LB

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE *Larry Bruce Baker Jr.* DATE 1-31-11



## EME Junction I-29-2

Unit I, Section 29, T19S, R37E



Site prior to excavating

1/29/2010



Delineation trench being excavated

1/29/2010



Backfilling excavation

2/05/2010



Seeding excavation

2/05/2010



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR  
RICE OPERATING COMPANY  
ATTN: BRUCE BAKER  
122 W. TAYLOR  
HOBBS, NM 88240

Receiving Date: 01/29/10  
Reporting Date: 02/01/10  
Project Number: NOT GIVEN  
Project Name: EME JCT I-29-2  
Project Location: EME JCT I-29-2

Sampling Date: 01/29/10  
Sample Type: SOIL  
Sample Condition: INTACT  
Sample Received By: JH  
Analyzed By: AB/HM

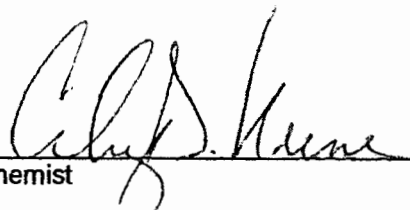
LAB NUMBER	SAMPLE ID	GRO	DRO	CI*
		(C <sub>6</sub> -C <sub>10</sub> ) (mg/kg)	(>C <sub>10</sub> -C <sub>28</sub> ) (mg/kg)	

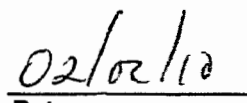
ANALYSIS DATE	01/31/10	01/31/10	02/01/10
H19183-1 SOURCE GRAB @ 10FT.	<10.0	24.1	224
Quality Control	573	510	510
True Value QC	500	500	500
% Recovery	115	102	102
Relative Percent Difference	0.5	<0.1	2.0

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI: Std. Methods 4500-CI/B

\*Analysis performed on a 1:4 w:v aqueous extract.

Reported on wet weight.

  
Chemist

  
Date

H19183 TCL RICE

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. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

**ARDINAL LABORATORIES**

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603  
(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

Company Name: <b>Rice Operating</b> Project Manager: <b>Bruce Baker</b> Address: <b>122 W. Taylor St</b> City: <b>HOBBBS</b> State: <b>NM</b> Zip: <b>88240</b> Phone #: <b>323-9174</b> Fax #: <b></b>		P.O. #: <b></b> Company: <b></b> Attn: <b></b> Address: <b></b> City: <b></b> State: <b></b> Zip: <b></b> Phone #: <b></b> Fax #: <b></b>		<b>BILL TO</b> <b>ANALYSIS REQUEST</b>																	
Project #: <b></b> Project Owner: <b></b> Project Name: <b>EME JCT I-29-2</b> Project Location: <b>EME JCT I-29-2</b> Sampler Name: <b>Jordan Woodcock</b>		<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th colspan="2">PRESERV</th> <th colspan="2">SAMPLING</th> </tr> <tr> <td>ACID/BASE:</td> <td>ICE / COOL</td> <td>OTHER:</td> <td>DATE</td> </tr> <tr> <td>OTHER:</td> <td></td> <td></td> <td>TIME</td> </tr> <tr> <td colspan="2"></td> <td colspan="2">1-29-10 3:00</td> </tr> </table>				PRESERV		SAMPLING		ACID/BASE:	ICE / COOL	OTHER:	DATE	OTHER:			TIME			1-29-10 3:00	
PRESERV						SAMPLING															
ACID/BASE:	ICE / COOL	OTHER:	DATE																		
OTHER:			TIME																		
		1-29-10 3:00																			
FOR LAB USE ONLY Lab I.D. <b>Sample I.D.</b> H191931 Source grab @ 10 ft		<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th colspan="2">MATRIX</th> <th colspan="2">CONTAINERS</th> </tr> <tr> <td>GROUNDWATER</td> <td>WASTEWATER</td> <td>SOIL</td> <td>SLUDGE</td> </tr> <tr> <td>OTHER:</td> <td></td> <td>OTHER:</td> <td></td> </tr> <tr> <td>ACID/BASE:</td> <td>ICE / COOL</td> <td>OTHER:</td> <td></td> </tr> </table>				MATRIX		CONTAINERS		GROUNDWATER	WASTEWATER	SOIL	SLUDGE	OTHER:		OTHER:		ACID/BASE:	ICE / COOL	OTHER:	
MATRIX		CONTAINERS																			
GROUNDWATER	WASTEWATER	SOIL	SLUDGE																		
OTHER:		OTHER:																			
ACID/BASE:	ICE / COOL	OTHER:																			
Relinquished By: <b>Jordan Woodcock</b> Date: <b>1-29-10</b> Time: <b>3:18pm</b> Relinquished By: <b>Bruce Baker</b> Date: <b>1-29-10</b> Time: <b>3:20pm</b>		Received By: <b>Bruce Baker</b> Received By: <b>Jordan Woodcock</b>																			
Delivered By: <b>Bruce Baker</b> Sampler - UPS - Bus - Other: <b>Other</b>		Checked By: <b>Jordan Woodcock</b> Sample Condition: <b>Intact</b> Cool <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No																			

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 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 services. 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 clients, 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.

Relinquished By: **Jordan Woodcock** Date: **1-29-10** Time: **3:18pm**  
 Relinquished By: **Bruce Baker** Date: **1-29-10** Time: **3:20pm**

Delivered By: **Bruce Baker**  
 Sampler - UPS - Bus - Other: **Other**

Checked By: **Jordan Woodcock**  
 Sample Condition: **Intact**  
 Cool ☐ Yes ☒ No

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

92#

# RICE OPERATING COMPANY

122 West Taylor Hobbs, NM 88240

PHONE: (575) 393-9174 FAX: (575) 397-1471

PID METER CALIBRATION & FIELD REPORT FORM

Check Model Number:

X

Model: PGM 7300

Serial No: 590-000183

Model: PGM 7300

Serial No: 590-000508

Model: PGM 7300

Serial No: 590-000504


Model: PGM 7600

Serial No: 110-023920

Model: PGM 7600

Serial No: 110-013744

Model: PGM 7600

Serial No: 110-013676

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 924503	EXPIRATION DATE: 7-5-2012
FILL DATE: 7-1-09	METER READING ACCURACY: 100

ACCURACY : +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	I-29-2	I	29	19 S	37 E

SAMPLE ID	PID	SAMPLE ID	PID
Source		Background	
3'	0.1	6"	0
4'	0.1		
5'	0		
6'	0		
7'	0		
8'	0		
9'	0		
10'	0		

I verify that I have calibrated the above instrument in accordance to the manufacture operation manual.

SIGNATURE: 

DATE: 1-28-10

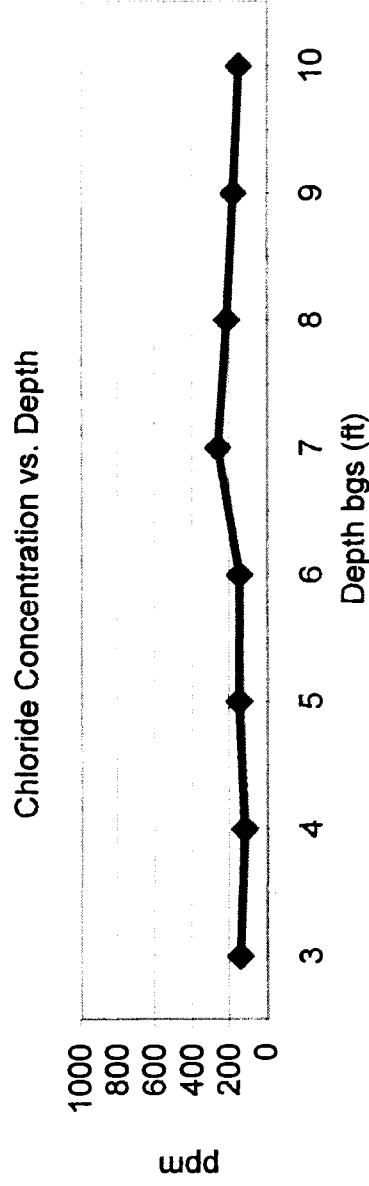


# EME Junction I-29-2

Unit 'I', Sec. 29, T19S, R37E

Backhoe samples at the junction (source)

Depth bgs (ft)	[Cl] ppm
3	140
4	116
5	145
6	143
7	260
8	211
9	178
10	148



Groundwater = 30 ft.



# Current Photodocumentation

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

**EME Jct. I-29-2**  
UL/I, Section 29, T19S, R37E



Facing north

3/1/2013



Facing west

3/1/2013