

1R - 427-139

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, July 29, 2013 2:08 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 (1R427-139) Termination - ROC EME O-35 North Site

**RE: Termination Request
for the Rice Operating Company's
EME O-35 North Site
Unit Letter O, Section 35, T20S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-139) 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 July 19, 2013 (received July 24, 2013). The report is 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 (1R427-139) 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

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8906

July 19, 2012

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

JUL 24 2013

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

RE: Termination Request
EME O-35 North (1R427-139): UL/O, Sec. 35, 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 and Previous Work

In 2004, ROC initiated work on the former O-35 North junction box. The site is located in UL O, Sec. 35, T20S, R36E. The junction box, the north box of two junction boxes, is located within an active production facility. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 122 +/- feet. The site was delineated using a backhoe to form a 10x3x12 ft deep excavation and soil samples were screened at regular intervals for both hydrocarbons and chlorides. Each sample was field titrated for chlorides and screened for TPH, resulting in low concentrations for chlorides and TPH. The 12 ft sample was sent to a commercial laboratory for analysis, resulting in a chloride concentration of 160 mg/kg and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The excavation was backfilled with the excavated soil to ground surface and contoured to the surrounding area. A new watertight junction box was built outside the facility, approximately 200 ft northeast of this site.

The junction box site location map, area map, final report, chloride graph, photo documentation, facility diagram, laboratory analysis, PID sheet 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 stylized, flowing script.

Hack Conder
Environmental Manager

enclosures

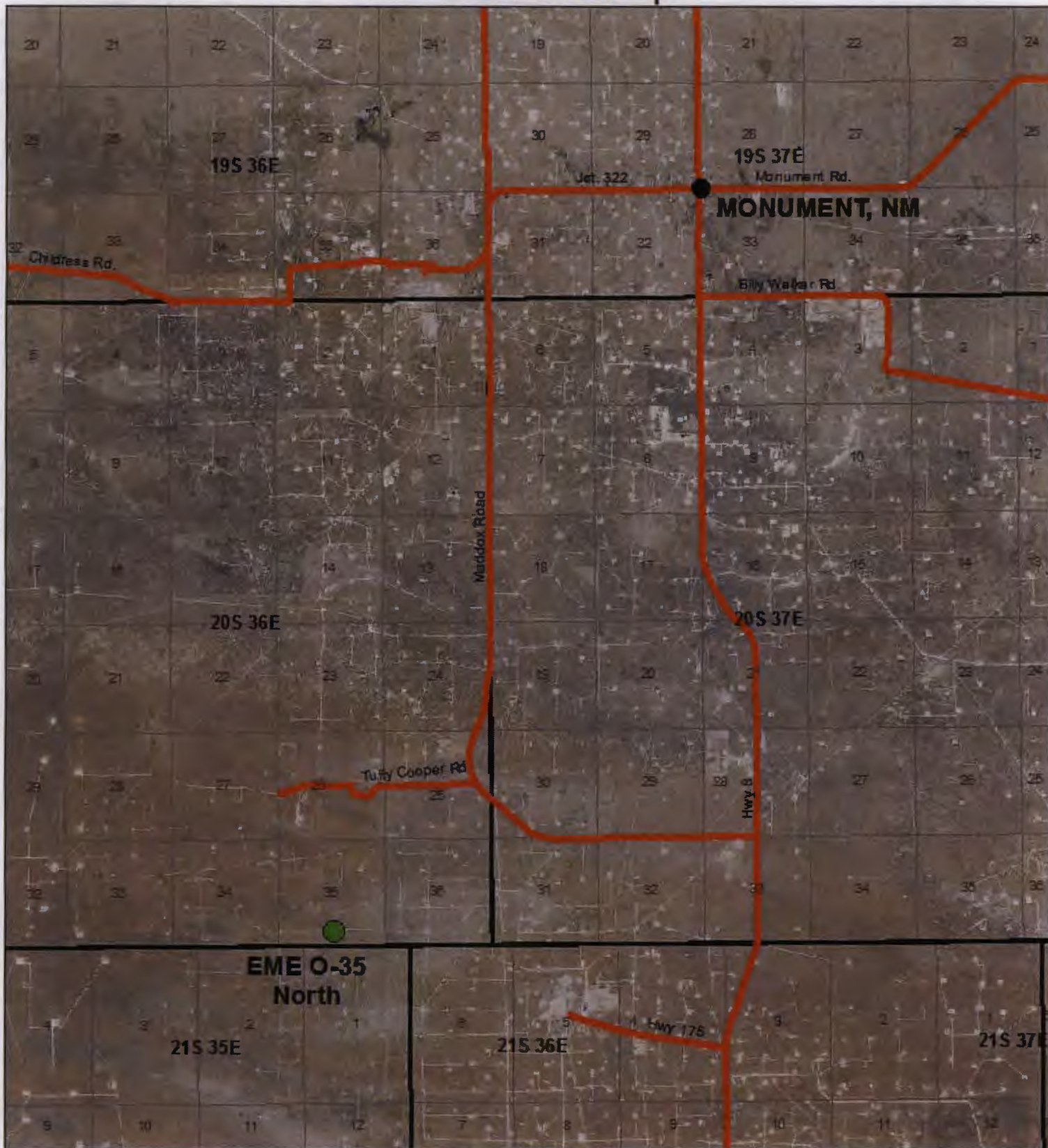
RECEIVED OGD
2013 JUL 24 P 2:25



Site Maps

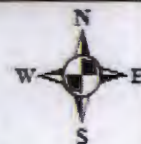
RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471

Site Location Map



**EME O-35
North
(1R427-139)**

**UL/O SECTION 35
T20S, R36E
LEA COUNTY, NM**

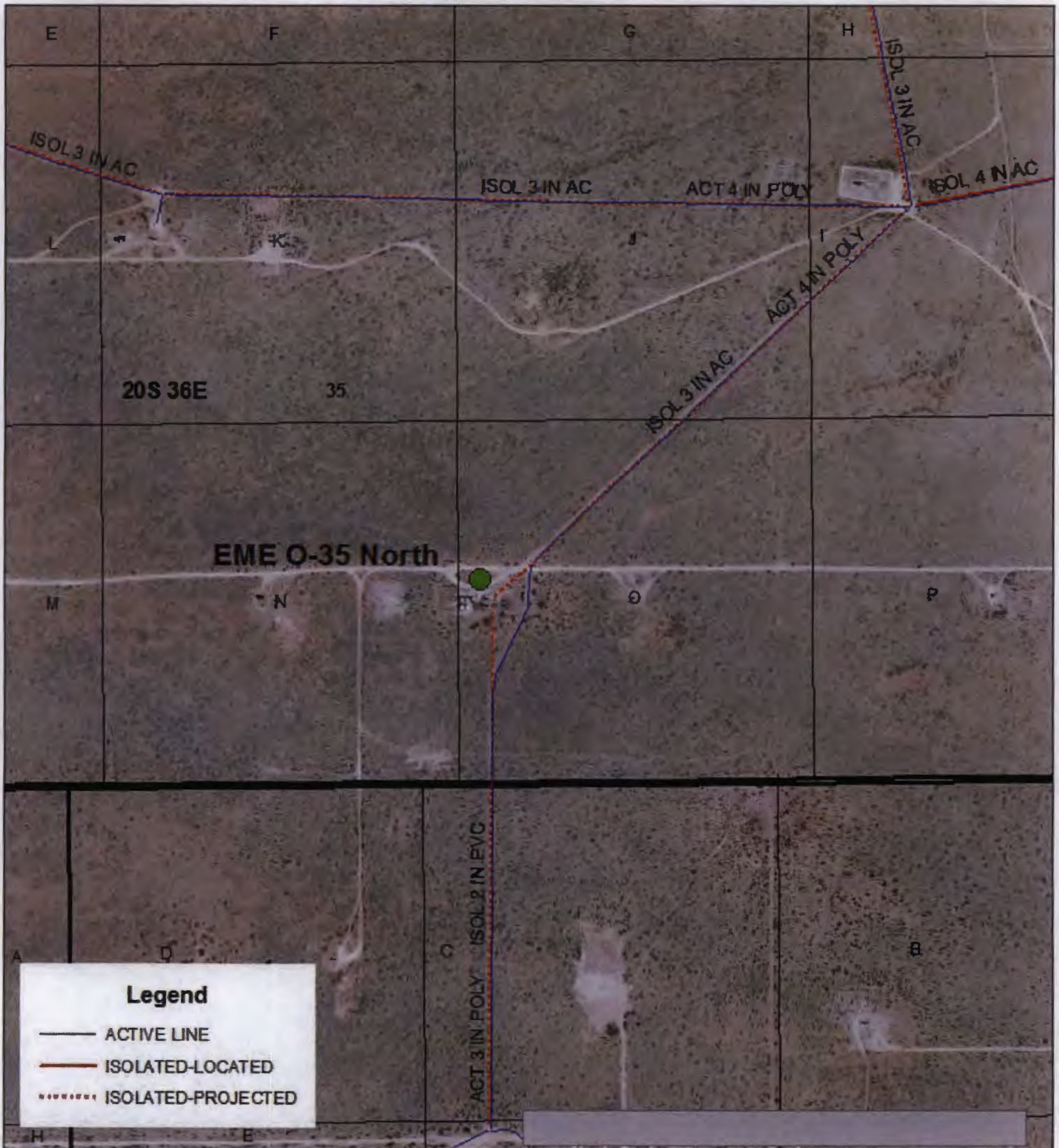


A number line from 0 to 2 with tick marks every 0.2 units. A bar graph is drawn below the line, with the word "Miles" at the right end. The bars represent the following values:

Animal	Miles
Antelope	0.4
Camel	0.6
Elephant	0.8
Giraffe	1.0
Kangaroo	1.2
Monkey	1.4
Rabbit	1.6
Snake	1.8
Tiger	2.0

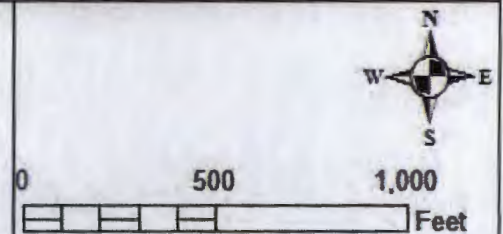
Drawing date: 7/12/13 LS

Area Map



**EME O-35
North
(1R427-139)**

UL/O SECTION 35
T20S, R36E
LEA COUNTY, NM



Drawing date: 7/12/13 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	O-35 North	O	35	20S	36E	Lea	Moved 200 ft Northeast (outside battery)		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER Tuffy Cooper OTHER _____

Depth to Groundwater 122 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 3/22/2004 Date Completed 3/22/2004 OCD Witness No

Soil Excavated 13 cubic yards Excavation Length 10 Width 3 Depth 12 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 3/22/2004 Sample Depth 12 ft

Procure 5-point composite sample of bottom and 4-point composite sample of sidewalls. TPH and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines.

CHLORIDE FIELD TESTS

Sample Location	PID ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
VERTICAL @ 12 ft	0.0	<10.0	<10.0	160
33 ft East @ 12 ft (background)	XXX	<10.0	<10.0	128

LOCATION	DEPTH (ft)	ppm
Vertical	5	449
at box	6	453
	7	407
	8	321
	9	175
	10	294
	11	178
	12	171
background 33 ft East	12	165

General Description of Remedial Action: This was the North box of 2 that were located inside an active production facility. Vertical delineation was conducted with a backhoe while chloride field tests were performed every foot. Chloride concentrations exhibited a conclusive decline in concentrations (see graph), indicative of non-saturated vadose conditions and not threatening to groundwater at 122 ft BGS. PID field screening results were minimal and lab analysis confirmed TPH concentrations well below NMOCD guidelines. The excavation trench was backfilled and contoured to the surrounding surface. A new watertight junction box has been built outside the battery approximately 200 ft Northeast of this box.

enclosures: chloride graph, photos, lab results, PID field screenings, diagram

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

SITE SUPERVISOR Joe Gatts SIGNATURE Joe Gatts COMPANY RICE Operating Company

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE Kristin Farris Pope

DATE 7/26/2004 TITLE Project Scientist

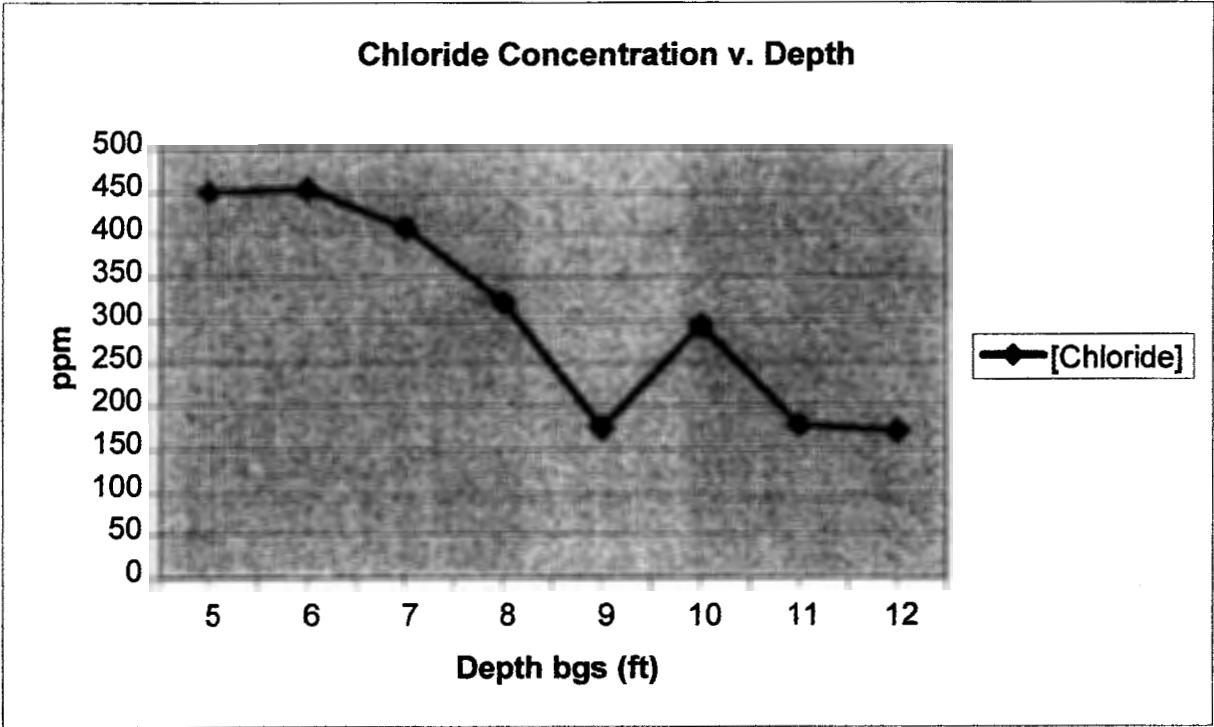
EME jct. O-35 North

T20S, R36E

Vertical Delineation at Source

Depth bgs (ft)	[Cl ⁻] ppm
5	449
6	453
7	407
8	321
9	175
10	294
11	178
12	171

Groundwater = 122 ft



EME jct. O-35 North Box



Boxes inside battery (looking SW); North box on right. 12/30/02



Vertical delineation with backhoe 3/22/04



Construction of new junction box 200 ft. NE 9/26/03

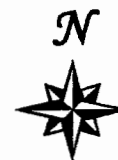
EME jct. O-35 North & South

Unit 'O', Sec. 35, T20S, R36E

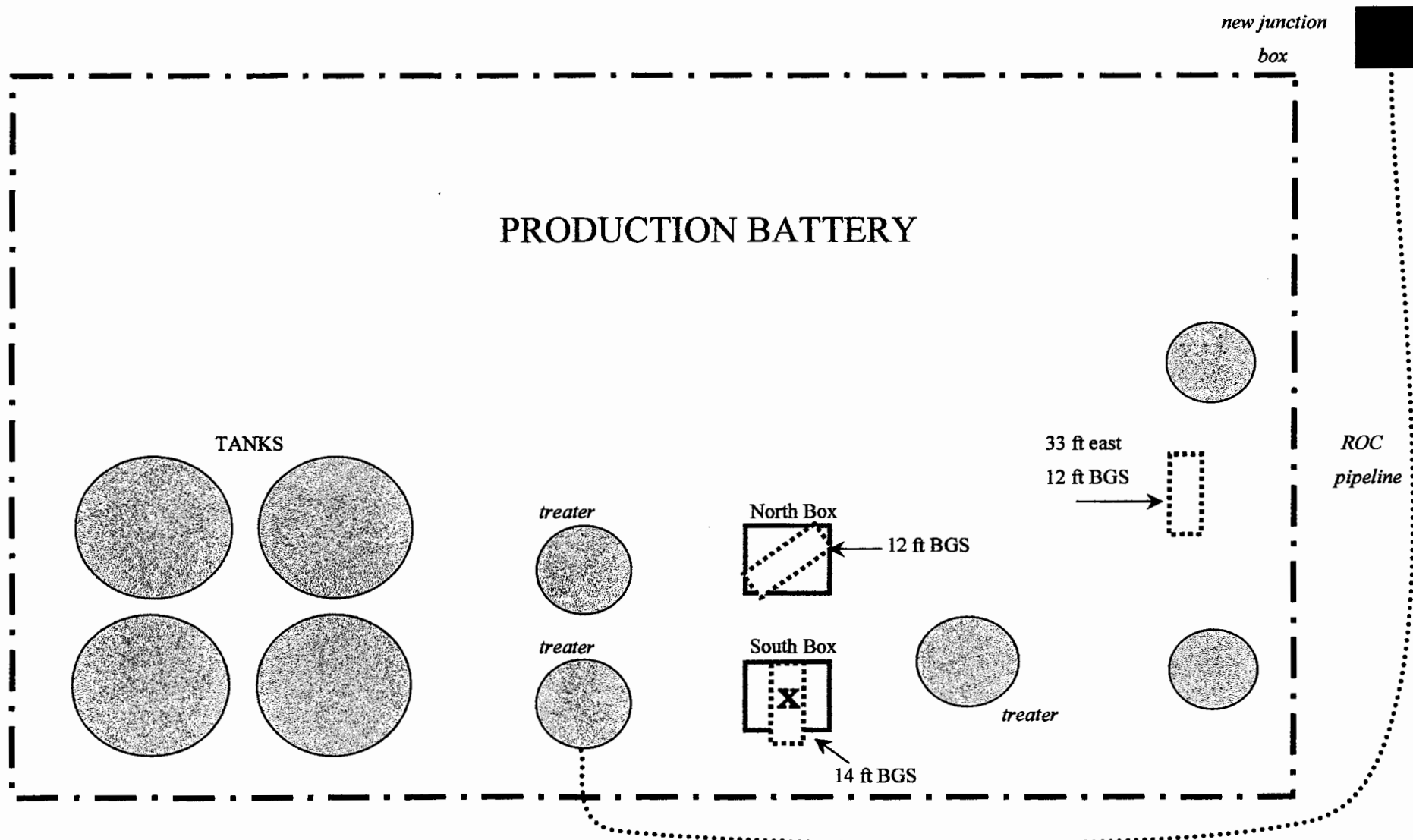
*** NOT TO SCALE ***

 = Excavation trench

X = Soil Bore Location



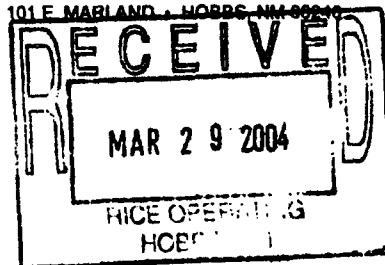
LEASE ROAD





PHONE (325) 873-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2328 • 101 E. MARLAND • HOBBBS, NM 86901



**ANALYTICAL RESULTS FOR
RICE OPERATING CO.
ATTN: KRISTIN FARRIS
122 W. TAYLOR
HOBBS, NM 88240
FAX TO: (505) 397-1471**

Receiving Date: 03/22/04
Reporting Date: 03/23/04
Project Number: NOT GIVEN
Project Name: JCT. O-35
Project Location: EME

Sampling Date: 03/22/04
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC/AH

LAB NO.	SAMPLE ID	GRO	DRO	Cl*
		(C ₈ -C ₁₀) (mg/Kg)	(>C ₁₀ -C ₂₈) (mg/Kg)	
	ANALYSIS DATE	03/22/04	03/22/04	03/23/04
H8550-1	NORTH BOX 12' BGS	<10.0	<10.0	160
H8550-2	SOUTH BOX 12' BGS	<10.0	<10.0	1070
H8550-3	33' EAST OF N. BOX 12' BGS	<10.0	<10.0	128
	Quality Control	843	835	980
	True Value QC	800	800	1000
	% Recovery	105	104	98.0
	Relative Percent Difference	5.6	1.1	2.0

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

***Analyses performed on 1:4 w:v aqueous extracts.**

Burgess J. Roche
Chemist

3/23/04
Date

H8550.XLS

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.



(915) 673-7001 Fax (915) 673-7020 (505) 393-2328 Fax (505) 393-2476

Page of

Terms and Conditions: Interest will be charged on all accounts more than 30 days past due at the rate of 24% per annum from the original date of invoice, and all costs of collection, including attorney's fees.

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

RICE OPERATING COMPANY

122 WEST TAYLOR

HOBBS, NEW MEXICO 88240

PHONE: (505) 393-9174 FAX: (505) 397-1471

VOC FIELD TEST REPORT FORM

MINI RAE PLUS CLASSIC PHOTOIONIZATION GAS DETECTOR

MODEL NO: PGM 761S

SERIAL NO: 104412

CALIBRATION GAS

GAS COMPOSITION: ISOBUTYLENE

100 PPM

AIR

BALANCE

LOT NO: 02-22-30

FILL DATE: 5/20/03

EXP. DATE: 11/20/04

ACCURACY: + or - 2%

METER READING

ACCURACY: 99.8

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
EME	0-35	0	75	T205	R36E

SAMPLE	PID RESULT	SAMPLE	PID RESULT
N. Box 5'bp	194	S. Box 10'bp	0
N. Box 6'bp	144	S. Box 11'bp	0
N. Box 7'bp	31	S. Box 12'bp	0
N. Box 8'bp	17	S. Box 13'bp	0
N. Box 9'bp	0	S. Box 14'bp	0
N. Box 10'bp	0		
N. Box 11'bp	0		
N. Box 12'bp	0		
S. Box 5'bp	147		
S. Box 6'bp	120		
S. Box 7'bp	55		
S. Box 8'bp	15		
S. Box 9'bp	0		

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


Signature

3/22/04
Date



Current Photodocumentation

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

EME O-35 North (1R427-139)

UL/O, Section 35, T20S, R36E



Facing north

5/28/2013



Facing east

5/28/2013