

1R - 427-322

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, September 05, 2013 8:26 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 (1R427-322) Termination - ROC EME J-25 EOL Site

**RE: Termination Request
for the Rice Operating Company's
EME J-25 EOL Site
Unit Letter J, Section 25, T20S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-322) 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 (including further investigation results), dated August 27, 2013 (received August 30, 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 (1R427-322) 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) 393-2967 • Fax: (575) 393-0293

RECEIVED OCD

2013 AUG 30 P 2: 31

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8913

August 27, 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-25 EOL (1R427-322): UL/J, Sec. 25, 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

In 2010, ROC initiated work on the former J-25 EOL junction box. The site is located in UL/J, Sec. 25, T20S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 106 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 30x30x12 ft deep excavation. Each sample was field titrated for chlorides and screened for TPH, resulting in low concentrations of each. The excavated soil was blended on site and representative composite samples of the excavation walls, bottom and blended backfill were sent to a commercial for analysis of chloride and TPH, resulting in a 4-wall chloride concentration of 272 mg/kg, a gasoline range organics (GRO) concentration below detectable limits and a diesel range organics (DRO) concentration of 39.2 mg/kg. The bottom composite resulted in a chloride concentration of 400 mg/kg and concentrations of GRO and DRO below detectable limits. The blended backfill resulted in a chloride concentration of 352 mg/kg, a GRO concentration below detectable limits and a DRO concentration of 38.9 mg/kg. The excavation was backfilled with the excavated soil to ground surface and contoured to the surrounding area. On 5/19/2010, the site was seed with a blend of native vegetation.

On 4/4/2013, the site was seeded with a blend of native vegetation. Vegetation will act as an evapo-transpiration barrier that will also inhibit the downward migration of chlorides and hydrocarbons. Plants capture water through their roots and so reduce the amount of water infiltrating below the root zone. The site revegetation form and photos of these activities are attached.

A Termination Request was submitted to NMOCD on April 26, 2013. On May 16, 2013, NMOCD requested further delineation of the site.

Further investigation

To further investigate the depth of chloride presence, a soil bore was initiated on June 18, 2013 at 4 ft west of the former junction box site. The boring was advanced to a depth of 25 ft below ground surface (bgs) with soil samples collected every 5 ft. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in concentrations that did relent with depth. The 15 ft and 25 ft samples were sent to a commercial laboratory for analysis. The 15 ft samples resulted in a chloride concentration of 96 mg/kg and concentrations of GRO and DRO below detectable limits. The 25 ft sample resulted in a chloride concentration of 48 mg/kg and concentrations of GRO and DRO below detectable limits. The entire bore hole was plugged with bentonite to ground surface.

The junction box site location map, area map, soil bore plat, logs, laboratory analysis and 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)393-2967 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,
RICE Operating Company



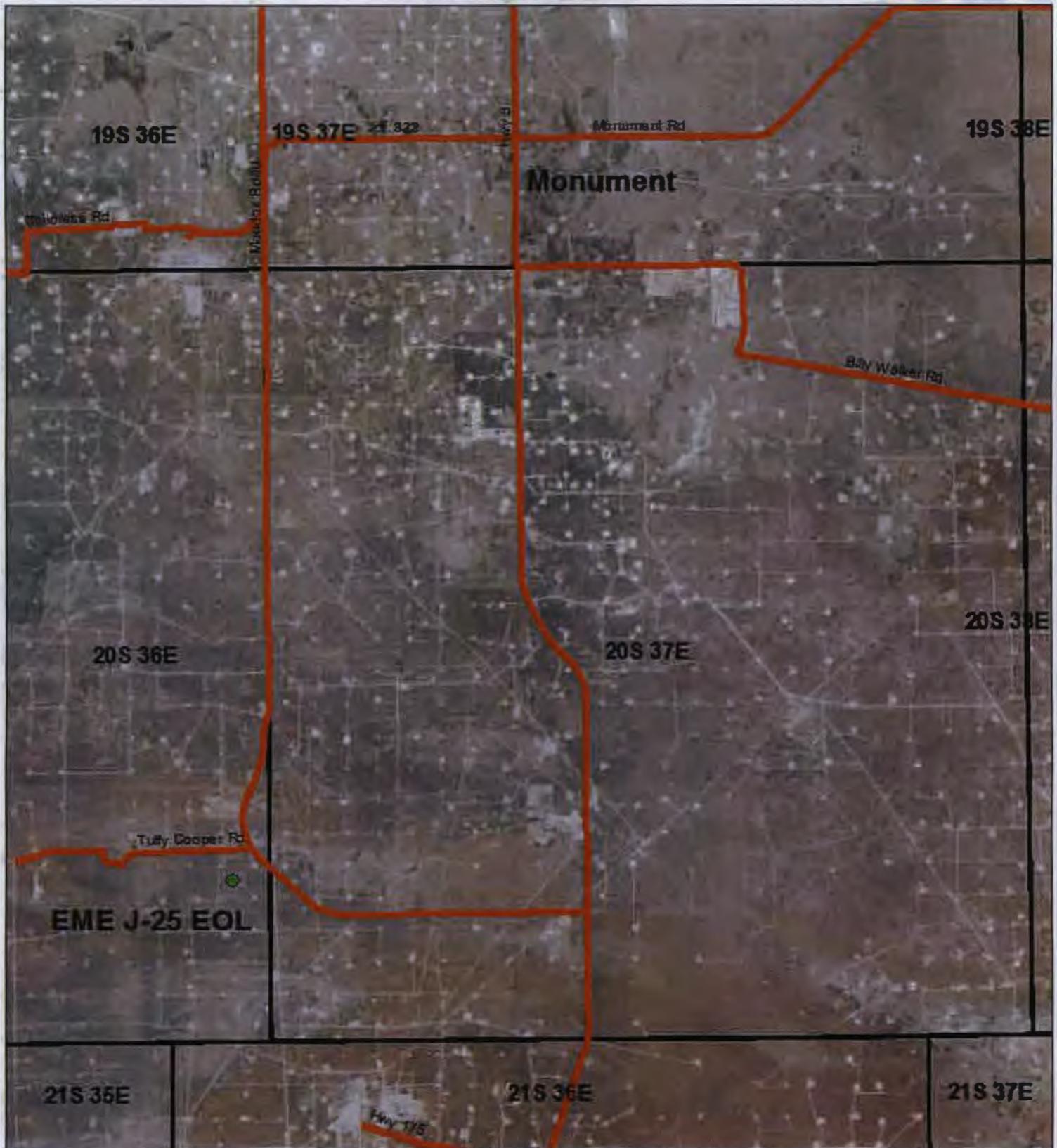
Hack Conder
Environmental Manager

enclosures

Site Maps

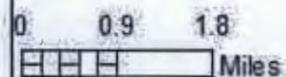
RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471

Site Location



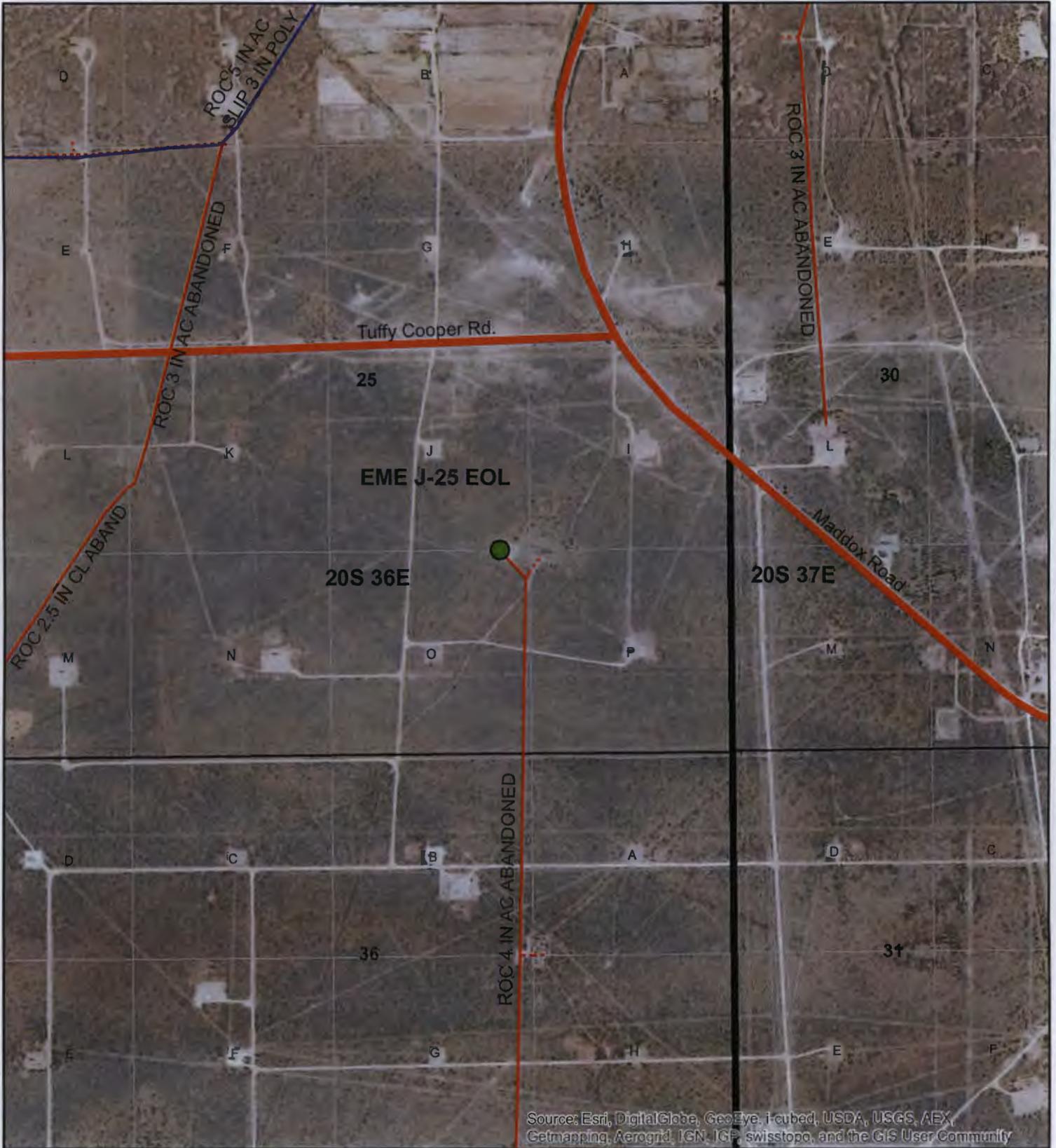
EME J-25 EOL (1R427-322)

LEGALS: UL/J, Sec. 25,
T-20-S, R-36-E
LEA COUNTY, NM



Drawing date: 2/12/13
Drafted by: L. Weinheimer

Area Map

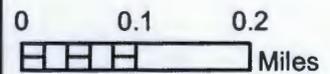


Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

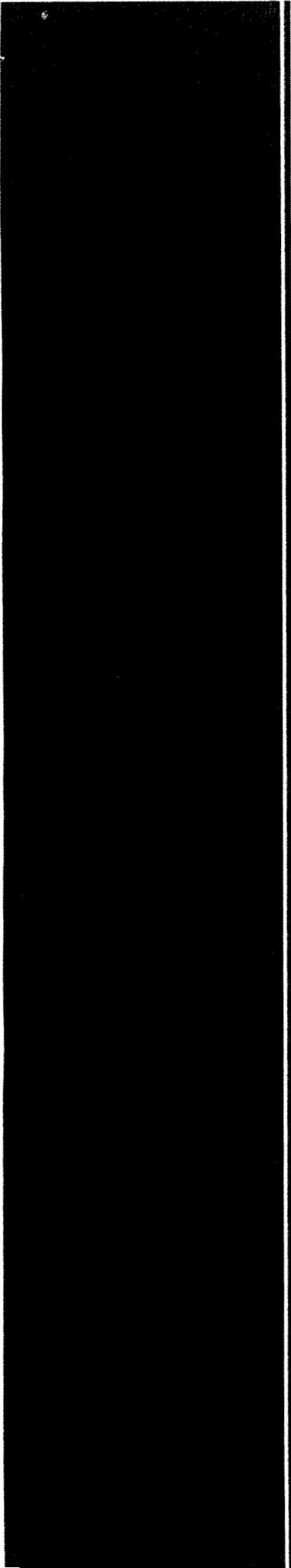


EME
J-25 EOL
UL J SECTION 25
T-20-S R-36-E
LEA COUNTY, NM

NMOCS Case # 1R427-322



Drawing date: 8/23/13
Drafted by: T. Grieco



Soil Bore Installation

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

Soil Bore Installation

Depth	Cl-	PID	SB-1		
			Lab Cl-	GRO	DRO
15	174	1.8	96	<10	<10
20	147	2.2			
25	84	2.4	48	<10	<10

SB-1 Source

NON-ROC 4 in STEEL LINE

ROC ABANDONED 4 IN AC LINE

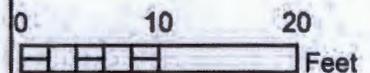
DGW: 106 ft



EME
J-25 EOL

UL J SECTION 25
T-20-S R-36-E
LEA COUNTY, NM

NMOCD Case #: 1R427-322



GPS date: 5/29/13 TG
Drawing date: 6/24/13
Drafted by: L. Weinheimer

June 24, 2013

KATIE JONES

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: EME J-25 EOL

Enclosed are the results of analyses for samples received by the laboratory on 06/18/13 15:50.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

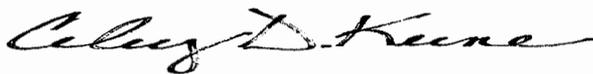
Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Caley D. Keene

Lab Director/Quality Manager

Analytical Results For:

 Rice Operating Company
 KATIE JONES
 112 W. Taylor
 Hobbs NM, 88240
 Fax To: (575) 397-1471

 Received: 06/18/2013
 Reported: 06/24/2013
 Project Name: EME J-25 EOL
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 06/18/2013
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: SB #1 15' (H301405-01)

Chloride, SM4500Cl-B		mg/kg	Analyzed By: DW							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	96.0	16.0	06/20/2013	ND	432	108	400	3.77		
TPH 8015M		mg/kg	Analyzed By: MS							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	06/21/2013	ND	220	110	200	1.01		
DRO >C10-C28	<10.0	10.0	06/21/2013	ND	231	116	200	0.0575		
<i>Surrogate: 1-Chlorooctane</i>		<i>94.4 %</i>	<i>65.2-140</i>							
<i>Surrogate: 1-Chlorooctadecane</i>		<i>94.8 %</i>	<i>63.6-154</i>							

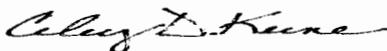
Sample ID: SB #1 25' (H301405-02)

Chloride, SM4500Cl-B		mg/kg	Analyzed By: DW							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	06/20/2013	ND	432	108	400	3.77		
TPH 8015M		mg/kg	Analyzed By: MS							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	06/21/2013	ND	220	110	200	1.01		
DRO >C10-C28	<10.0	10.0	06/21/2013	ND	231	116	200	0.0575		
<i>Surrogate: 1-Chlorooctane</i>		<i>90.0 %</i>	<i>65.2-140</i>							
<i>Surrogate: 1-Chlorooctadecane</i>		<i>92.0 %</i>	<i>63.6-154</i>							

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- ** Samples not received at proper temperature of 6°C or below.
- *** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



CARDINAL 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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: RICE Operating		BILL TO		ANALYSIS REQUEST																	
Project Manager: Katie Jones		P.O. #:		Chlorides	TPH 8015 M	BTEX	Texas TPH	Complete Cations/Anions	TDS												
Address: 112 W. Taylor		Company:																			
City: Hobbs State: NM Zip: 88240		Attn:																			
Phone #: Fax #:		Address:																			
Project #: Project Owner:		City:																			
Project Name:		State: Zip:																			
Project Location: EME J-25 E.O.L		Phone #:																			
Sampler Name: Edward Cesareo		Fax #:																			
FOR LAB USE ONLY										MATRIX		PRESERV.		SAMPLING							
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS							GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE/COOL	OTHER:	DATE	TIME	
H301405	EME J-25 E.O.L																				
1	SB# 15'	G	1		✓								6-18-13		✓	✓					
2	SB# 25'	G	1		✓								6-18-13		✓	✓					

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Relinquished By: <i>Edward Cesareo</i>	Date: 6-18-13	Received By: <i>Ardi Henson</i>	Phone Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Phone #:
Relinquished By:	Time: 3:50	Received By:	Fax Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Fax #:
Delivered By: (Circle One)	Time:	Sample Condition	REMARKS:	
Sampler - UPS - Bus - Other:		Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/>	email results	
		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	hconder@rice-ecs.com; Lweinheimer@rice-ecs.com;	
		Yes <input type="checkbox"/> No <input type="checkbox"/>	kjones@riceswd.com; Lpena@riceswd.com;	
			knorman@rice-ecs.com; ecesareo@rice-ecs.com	
		CHECKED BY: <i>[Signature]</i>		

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

#54

**EME J-25 EOL (1R427-322)
Unit Letter J, Section 25, T-20-S, R-36-E**



Drilling SB-1, facing northwest 6/18/13



Plugging SB-1 in total with bentonite 6/18/13



Completed SB-1, facing northeast 6/18/13