

1R - 427-69

# APPROVALS

YEAR(S):

2013

**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Tuesday, September 10, 2013 2:46 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 (1R427-69) Termination - ROC EME K-25 Site

**RE: Termination Request  
for the Rice Operating Company's  
EME K-25 Site  
Unit Letter K, Section 25, T19S, R36E, NMPM, Lea County, New Mexico  
Remediation Plan (1R427-69) 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 September 5, 2013 (received September 9, 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 (1R427-69) 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 8937

**September 5, 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 K-25 (1R427-69): UL/K, Sec. 25, T19S, 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 2002, ROC initiated work on the former K-25 junction box. The site is located in UL/K, Sec. 25, T19S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 63 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 20x18x13 ft deep excavation. Each sample was field titrated for chlorides, resulting in low concentrations. 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 89 mg/kg, a gasoline range organics (GRO) concentration below detectable limits and a diesel range organics (DRO) concentration of 61 mg/kg. The bottom composite sample resulted in a chloride concentration of 76 mg/kg, a GRO concentration below detectable limits and a DRO concentration of 38 mg/kg. Both samples were also analyzed for BTEX, resulting in concentrations below detectable limits throughout. A compacted clay layer was installed and will provide a barrier that will inhibit the downward migration of chlorides to groundwater. The total of 160 cubic yards of excavated soil was properly disposed of at a NMOCD approved facility. The excavation was backfilled with clean topsoil to ground surface and contoured to the surrounding area. Vegetation has rebounded at this site so no further action is warranted.

RECEIVED 0000  
2013 SEP -9 PM 1:30

Vegetation above the liner will also provide a natural infiltration barrier for the site since plants capture water through their roots thereby reducing the volume of water moving through the vadose zone to groundwater. A junction box is no longer required at this site.

The junction box site maps, 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.

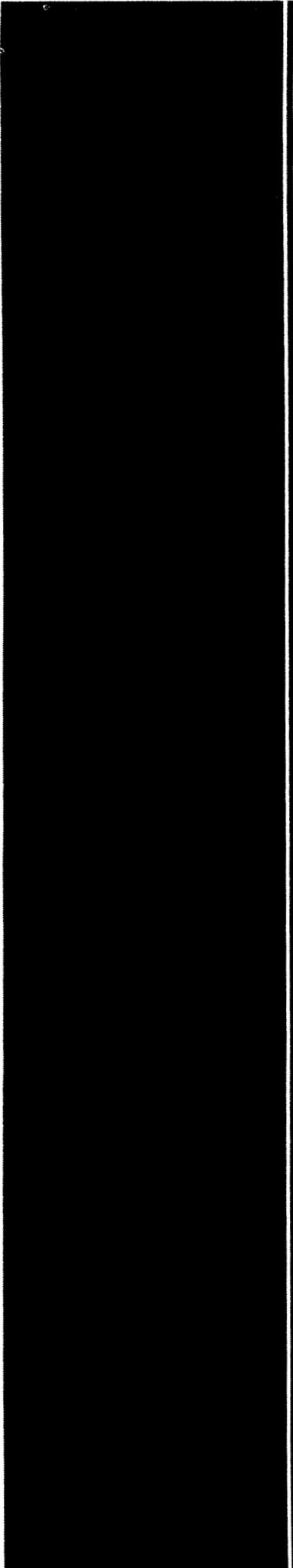
Please contact me at (575)393-2967 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,  
RICE Operating Company

A handwritten signature in cursive script that reads "Laura Flores".

Laura Flores  
Environmental Project Assistant Manager

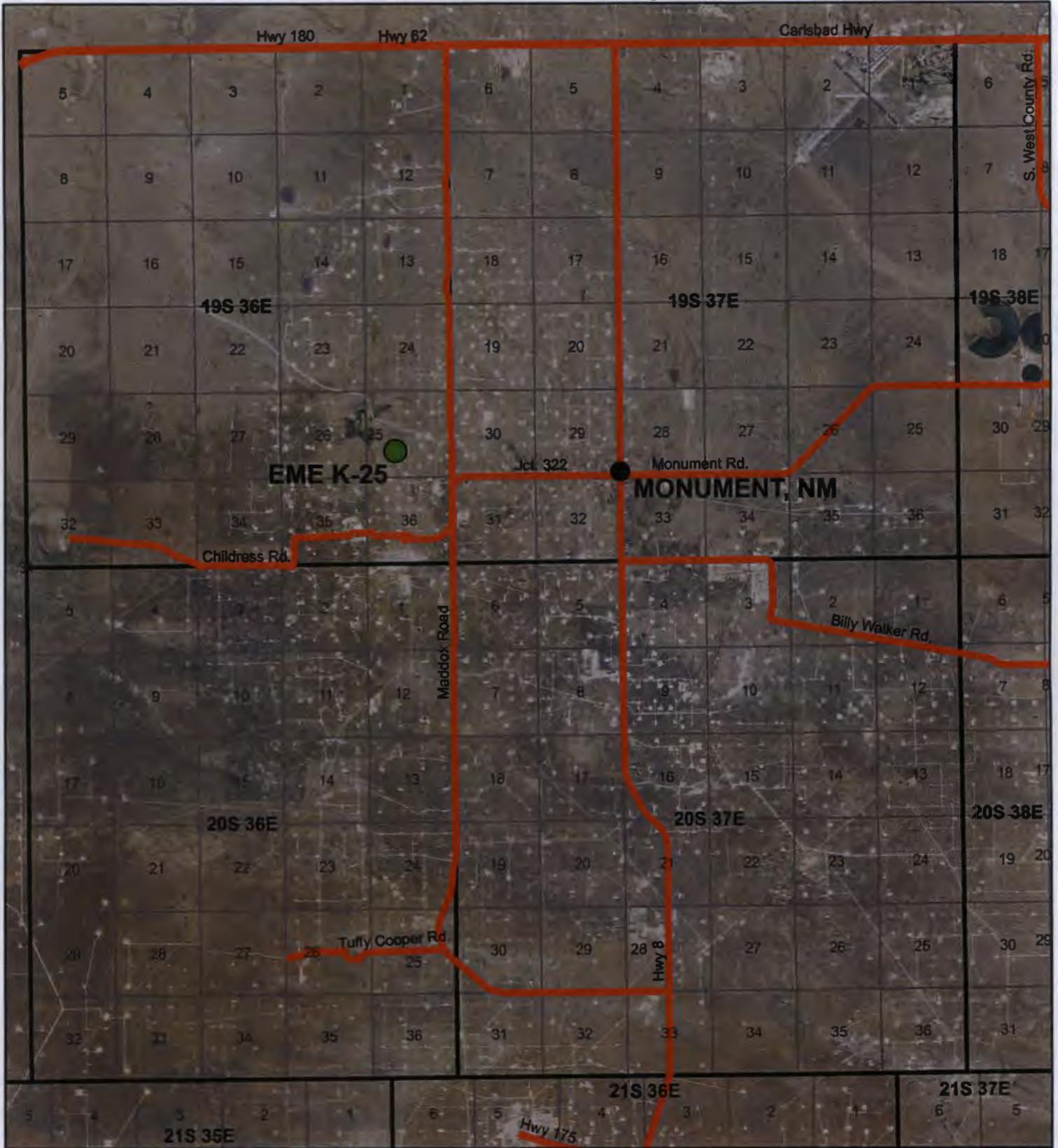
enclosures



# Site Maps

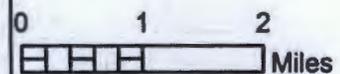
**RICE *Operating Company* (ROC)**  
112 West Taylor Hobbs, NM 88240  
Phone: (575) 393-9174 Fax: (575) 397-1471

# Site Location Map



**EME K-25  
(1R427-69)**

**UL/K SECTION 25  
T19S, R36E  
LEA COUNTY, NM**



Drawing date: 5/6/13 LS

# Area Map



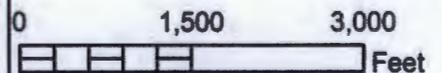
**Legend**

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

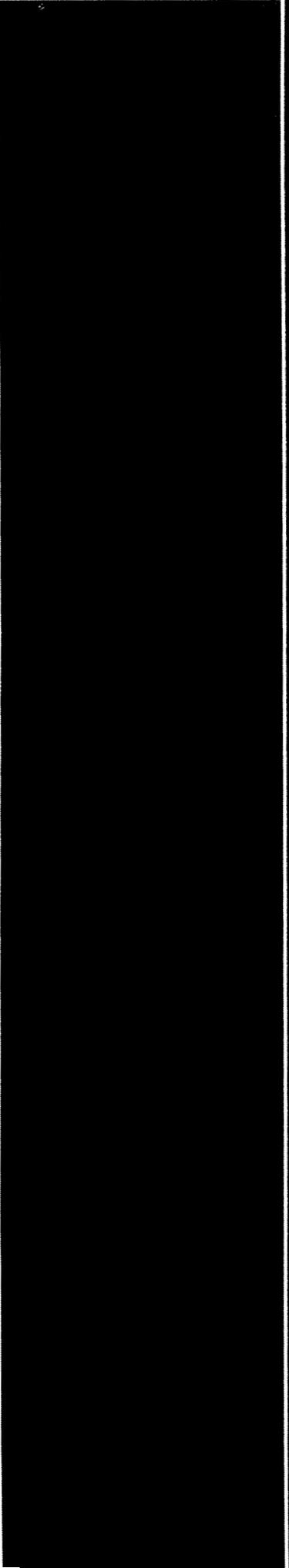


## EME K-25 (1R427-69)

UL/K SECTION 25  
T19S, R36E  
LEA COUNTY, NM



Drawing date: 5/6/13 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	K-25	K	25	19S	36E	LEA			

LAND TYPE: BLM \_\_\_\_\_ STATE \_\_\_\_\_ FEE LANDOWNER JIMMIE T COOPER OTHER \_\_\_\_\_

Depth to Groundwater 63 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 01/16/2002 Date Completed 01/18/2002 OCD Witness NO

Soil Excavated 160 cubic yards Excavation Length 20 Width 18 Depth 13 feet

Soil Disposed 160 cubic yards Offsite Facility C&C LANDFARM Location MONUMENT, NM

**FINAL ANALYTICAL RESULTS:** Sample Date 01/17/2002 Sample Depth 13'

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	61	89
BOTTOM	<0.025	<0.025	<0.025	<0.025	<10	38	76

General Description of Remedial Action: Delineated vertical and lateral extent to below

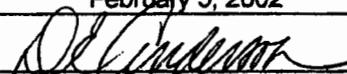
NMOCD guidelines. Installed compacted clay barrier to vertical transmissivity. No junction box is required at this site. Backfilled with clean topsoil. Natural attenuation will remediate the remaining hydrocarbon.

**CHLORIDE FIELD TESTS**

LOCATION	DEPTH	mg/kg
SIDEWALLS	8'	250
BOTTOM	13'	100

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

DATE February 5, 2002 PRINTED NAME D. E. Anderson

SIGNATURE  TITLE Project Leader - Environmental

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

RE ENVIRONMENTAL  
ATTN: DEREK ROBINSON  
P.O. BOX 13418  
ODESSA, TEXAS 79768-3418  
FAX: 366-0804  
FAX: 505-397-1471 (Donnie Anderson)

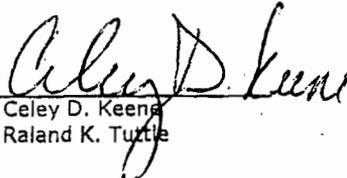
Sample Type: Soil  
Sample Condition: Intact/ Iced/ 18.0 deg C  
Project Name: EME K-25  
Project #: None Given  
Project Location: Monument

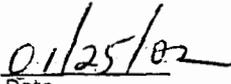
Sampling Date: See Below  
Receiving Date: 01/22/02  
Analysis Date: 01/23/02

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg	Sample Date
0202441-01	Bottom Sample @ 13'	<10	38	1/17/02
0202441-02	Wall Composite @ 8'	<10	61	1/18/02

QUALITY CONTROL	507	527
TRUE VALUE	500	500
% INSTRUMENT ACCURACY	101	105
SPIKED AMOUNT	476	476
ORIGINAL SAMPLE	<10	<10
SPIKE	512	500
SPIKE DUP	522	538
% EXTRACTION ACCURACY	108	105
BLANK	<10	<10
RPD	1.93	7.32

Methods: SW 846-8015M

  
Celey D. Keene  
Raland K. Tuttle

  
Date

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ATTN: DEREK ROBINSON  
P.O. BOX 13418  
ODESSA, TEXAS 79768-3418  
FAX: 366-0804  
FAX: 505-397-1471 (Donnie Anderson)

Sample Type: Soil  
Sample Condition: Intact/ Iced/ 18.0 deg C  
Project Name: EME K-25  
Project #: None Given  
Project Location: Monument

Sampling Date: See Below  
Receiving Date: 01/22/02  
Analysis Date: 01/23/02

ELT#	FIELD CODE	Chloride mg/kg	Sample Date
0202441-01	Bottom Sample @ 13'	76	1/17/02
0202441-02	Wall Composite @ 8'	89	1/18/02

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	714
ORIGINAL SAMPLE	76
SPIKE	785
SPIKE DUP	785
% EXTRACTION ACCURACY	99
BLANK	<5.00
RPD	0

METHODS: EPA SW 846-9253

  
\_\_\_\_\_  
Caley D. Keene  
Raland K. Tuttle

  
\_\_\_\_\_  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

RE ENVIRONMENTAL  
ATTN: DEREK ROBINSON  
P.O. BOX 13418  
ODESSA, TEXAS 79768-3418  
FAX: 366-0804  
FAX: 505-397-1471 (Donnie Anderson)

Sample Type: Soil  
Sample Condition: Intact/ Iced/ 18.0 deg. C  
Project Name: EME K-25  
Project #: None Given  
Project Location: Monument

Sampling Date: See Below  
Receiving Date: 01/22/02  
Analysis Date: 01/22/02

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg	SAMPLE DATE
0202441-01	Bottom Sample @ 13'	<0.025	<0.025	<0.025	<0.025	<0.025	01/17/02
0202441-02	Wall Composite @ 8'	<0.025	<0.025	<0.025	<0.025	<0.025	01/18/02

QUALITY CONTROL	0.113	0.114	0.110	0.222	0.106
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% IA	113	114	110	111	106
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	<0.025	<0.025	<0.025	<0.025	<0.025
SPIKE	0.102	0.104	0.100	0.212	0.099
SPIKE DUP	0.106	0.108	0.104	0.223	0.104
%EA	102	104	100	106	99
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025
RPD	3.85	3.77	3.92	5.06	4.93

METHODS: EPA SW 846-8021B ,5030

  
Caley D. Keene  
Raland K. Tuttle

  
Date



**C & C LANDFARM, INC.**

BOX 55

MONUMENT, NEW MEXICO 88265

1200

PHONE: (505) 397-2045

(505) 397-2860

(505) 392-2236

001813

COMPANY NAME Rice Operating  
COMPANY REPRESENTATIVE NAME Dennis Anderson  
LEASE NAME \_\_\_\_\_

SEC. TOWNSHIP RANGE

TRUCKING COMPANY NAME R.E.  
DRIVERS SIGNATURE Quik Robinson  
TYPE OF MATERIAL BEING HAULED AND QUANTITY 160 yds  
Rock & Cont Soil

COPY OF ANALYSIS ATTACHED, IF REQUIRED \_\_\_\_\_

TPHC \_\_\_\_\_

BENZENE \_\_\_\_\_

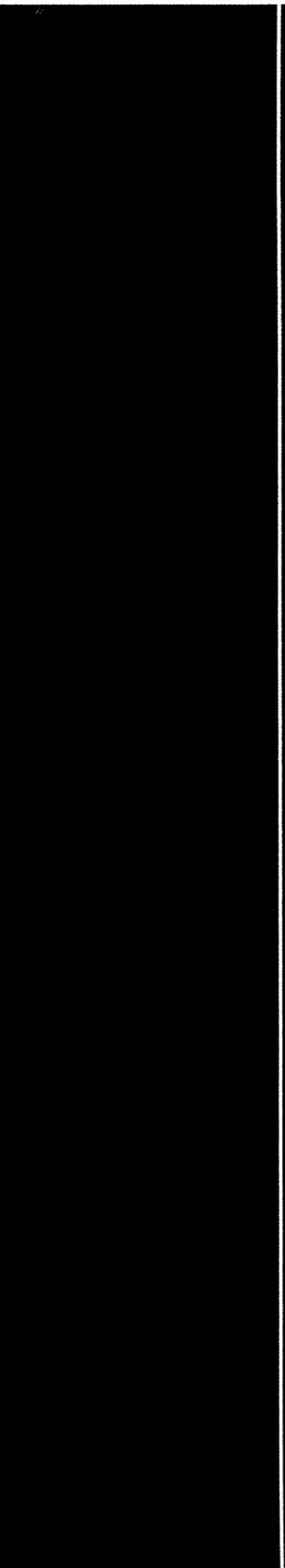
TOLUENE \_\_\_\_\_

ETHYL BENZENE \_\_\_\_\_

PARA XYLENE \_\_\_\_\_

ATTENDANT ON DUTY Jim Cook

DATE 1-21-002



# Current Photodocumentation

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

**EME K-25 (1R427-69)**  
Unit Letter K, Section 25, T19S, R36E



Facing south

7/18/2013



Facing east

7/18/2013