

1R - 427-147

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, September 24, 2013 2:38 PM
To: Hack Conder (hconder@riceswd.com)
Cc: Lowe, Leonard, EMNRD; 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 (1R427-147) Termination - ROC EME Jct M-17 Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct M-17 Site
Unit Letter M, Section 17, T20S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-147) 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 12, 2013 (received September 16, 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 (1R427-147) 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 OGD

SEP 16 2013 P 1:45

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8944

September 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 Jct. M-17 (1R427-147): UL/M, Sec. 17, T20S, R37E

RICE Operating Company – Eunice Monument Eumont (EME) 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 M-17 junction box. The site is located in UL M, Sec. 17, T20S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 25 +/- feet. This junction box was located within the fence of an active production battery facility. Due to safety concerns, delineation of the junction box was not undertaken. ROC has a mutual understanding with the producer of the facility, that the former junction box area will be encompassed in their environmental clean-up once the facility is abandoned.

The junction box was removed and backfilled with clean imported soil to ground surface. Since it is located within a facility, the site does not warrant revegetation. A new watertight junction box was built 200 ft southeast of this site, outside of the battery.

The junction box site map, area map, final report, photodocumentation and current photodocumentation are attached.

Please contact Hack Conder or 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, appearing to read "L. Flores".

Laura Flores
Environmental Project Assistant Manager

enclosures



Site Maps

RICE *Operating Company* (ROC)
419 West Cain Hobbs, NM 88240
Phone: (575) 393-2967 Fax: (575) 393-0293

Site Location Map

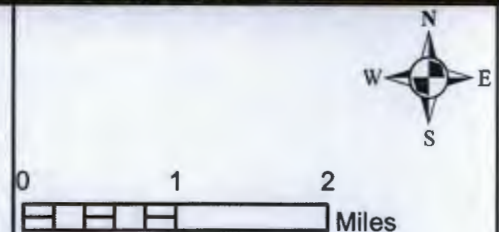


Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community



**EME Jct. M-17
(1R427-147)**

Unit Letter M, Section 17,
T20S, R37E
Lea County, NM

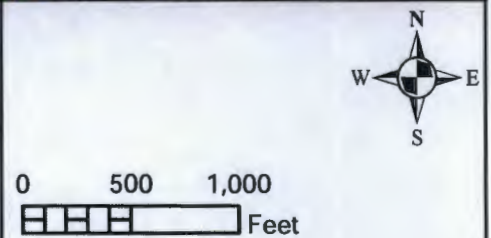


Area Map



**EME Jct. M-17
(1R427-147)**

Unit Letter M, Section 17,
T20S, R37E
Lea County, NM



Junction Box Report

RICE *Operating Company* (ROC)
419 West Cain Hobbs, NM 88240
Phone: (575) 393-2967 Fax: (575) 393-0293

RICE OPERATING COMPANY JUNCTION BOX FINAL REPORT

BOX LOCATION

| SWD SYSTEM | JUNCTION | UNIT | SECTION | TOWNSHIP | RANGE | COUNTY | BOX DIMENSIONS - FEET | | |
|------------|----------|------|---------|----------|-------|--------|------------------------|-------|-------|
| EME | M-17 | M | 17 | 20S | 37E | Lea | Length | Width | Depth |
| | | | | | | | moved 200 ft southeast | | |

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

Depth to Groundwater 25 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 7/12/2004 Date Completed 7/12/2004 OCD Witness No

Soil Excavated n/a cubic yards Excavation Length n/a Width n/a Depth n/a feet

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

FINAL ANALYTICAL RESULTS: Sample Date n/a Sample Depth n/a

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 | Ethylbenzene mg/kg | Total Xylenes mg/kg | GRO mg/kg | DRO mg/kg | Chloride mg/kg |
|-----------------|---------------|---------------|--------------------|---------------------|-----------|-----------|----------------|
| SIDEWALLS | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| BOTTOM | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| REMEDIATED | n/a | n/a | n/a | n/a | n/a | n/a | n/a |

General Description of Remedial Action: This junction box was located within the fence of an active production battery. Delineation and excavation was impractical due to active facilities and pipelines surrounding the box. Since the facility is still active, the producer has agreed to remediate the junction box site along with the battery at the end of its production. The box and lumber have been removed and the hole backfilled with imported clean soil. A new watertight junction has been built 200 ft southeast of this site, outside of the battery.

enclosures: photos

CHLORIDE FIELD TESTS

| LOCATION | DEPTH (ft) | ppm |
|----------|------------|-----|
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

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

DATE 7/22/2004 PRINTED NAME Kristin Farris Pope

SIGNATURE Kristin Farris Pope TITLE Project Scientist

EME jct. M-17

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Undisturbed box before NORM removal 12/20/2002



NORM decontamination 12/24/2002



After NORM decontamination; before re-plumbing 7/23/2003

EME jct. M-17

page 2



new plumbing at new box site 200 ft southeast



completed new box 200 ft southeast



backfilling old box location with clean fill

7/12/2004



Current Photodocumentation

RICE *Operating Company* (ROC)
419 West Cain Hobbs, NM 88240
Phone: (575) 393-2967 Fax: (575) 393-0293

EME Jct. M-17 (1R427-147)
Unit Letter M, Section 17, T20S, R37E



Facing north-northeast

5/28/2013



Facing north

5/28/2013