

1R - 427-38

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, January 23, 2013 9:35 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 (1R427-38) Termination - ROC EME Felton 'A' EOL Site

**RE: Termination Request
for the Rice Operating Company's
EME Felton 'A' EOL Site
Unit Letter F, Section 28, T21S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-38) 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 January 11, 2013 (received January 15, 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 (1R427-38) 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 8746

RECEIVED

January 11, 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

JAN 11 2013

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

RE: Termination Request
EME Felton 'A' EOL (1R427-38): UL/F Sec. 28, T21S, 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 2003, ROC initiated work on the former Felton 'A' EOL junction box. The site is located in UL/F, Sec. 28, T21S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 147 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 20x15x12 ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons. The excavated soil was blended on site and representative composite samples of the excavation bottom, the excavation walls, and the remediated backfill were sent to a commercial laboratory for analysis of chloride and TPH, resulting in a sidewall chloride concentration of 320 mg/kg and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The bottom composite resulted in chloride concentrations of 368 mg/kg and GRO and DRO concentrations below detectable limits. The remediated backfill resulted in a chloride concentration of 64 mg/kg and GRO and DRO concentrations below detectable limits. The remediated backfill was returned to the excavation to ground surface and contoured to the surrounding area. Due to the proximity to the facility and the road, the site was not seeded but is expected to return to productive capacity at a normal rate.

The junction box site location map, final report, photodocumentation, PID sheet, laboratory analysis, and current site 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.

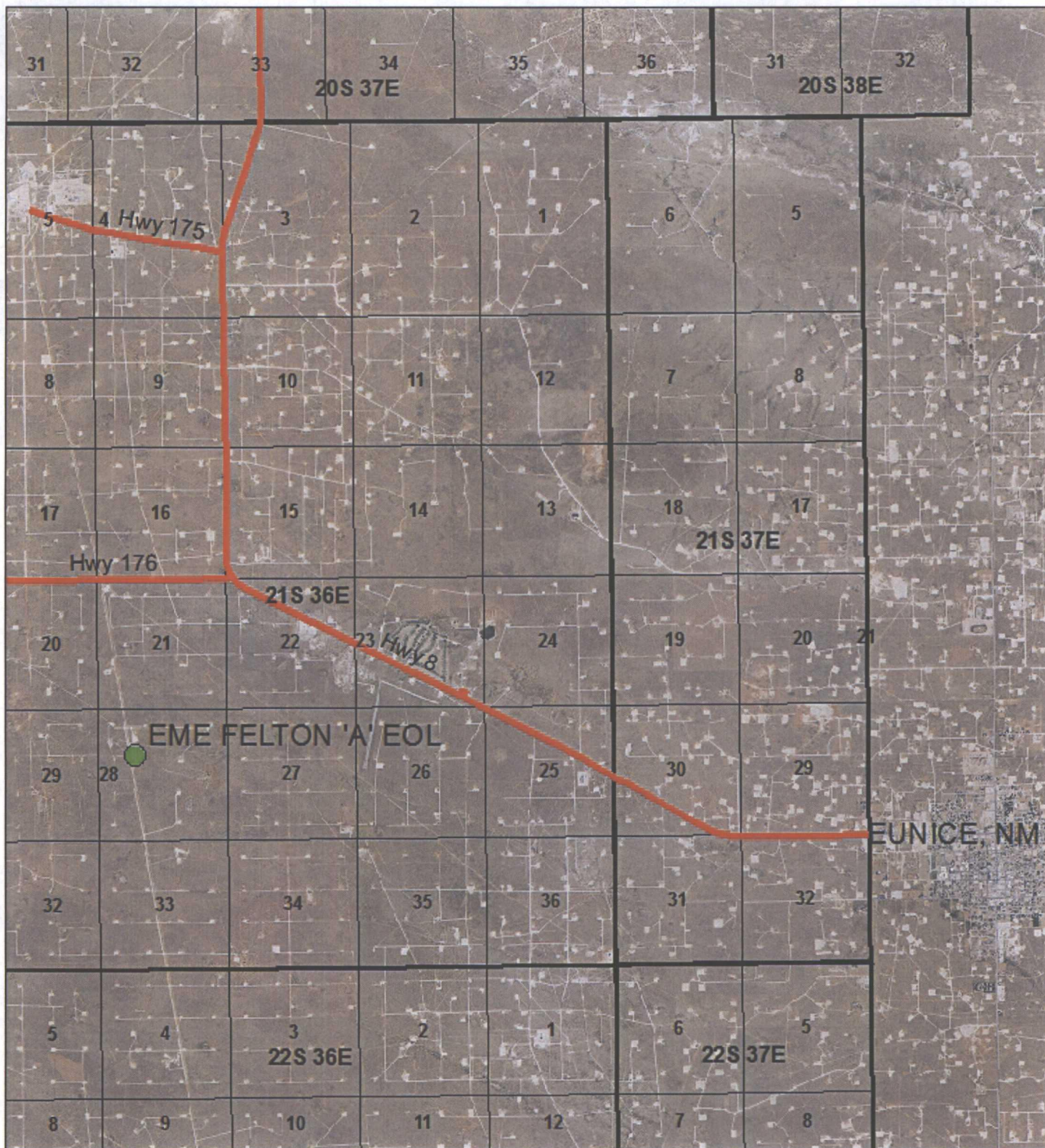
Hack Conder
Environmental Manager

enclosures



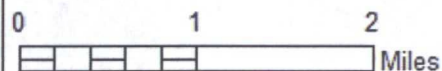
Site Location Map

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



EME FELTON 'A' EOL

UL F SECTION 28
T-21-S R-36-E
LEA COUNTY, NM



Drawing date: 12/7/12
Drafted by: Tony Grieco



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		
EME	Felton 'A' EOL	F	28	21S	36E	Lea	Length	Width	Depth
							Moved 100 ft Northwest		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER 91% Dasco Land Corp. OTHER _____

Depth to Groundwater 147 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 8/8/2003 Date Completed 8/26/2003 OCD Witness No

Soil Excavated 133 cubic yards Excavation Length 20 Width 15 Depth 12 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 8/12/2003 Sample Depth 12 ft

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	PID ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
SIDEWALLS	21.6	<10.0	<10.0	320
BOTTOM	34.1	<10.0	<10.0	368
REMEDIATED	16.1	<10.0	<10.0	64

CHLORIDE FIELD TESTS

General Description of Remedial Action: Delineation of this site yielded conclusive vertical and lateral chloride declination trends. PID readings were taken regularly and did not indicate the presence of elevated volatiles or TPH. The soil from the 20 x 15 x 12-ft deep excavation was blended thoroughly and then backfilled. These activities are not threatening to groundwater, human health, or the environment. A new water-tight junction box has been built 100 ft Northwest of this location. Due to the proximity to the production facility and the road, the disturbed surface was not seeded but is expected to return to productive capacity at a normal rate.

LOCATION	DEPTH (ft)	ppm
Vertical	5	725
	6	595
	7	548
	8	566
	9	475
	10	410
	11	321
	12	268
bottom comp.	12	386
4-wall comp.	n/a	387

cc: diagram, lab results, chloride graph, PID test results, photos

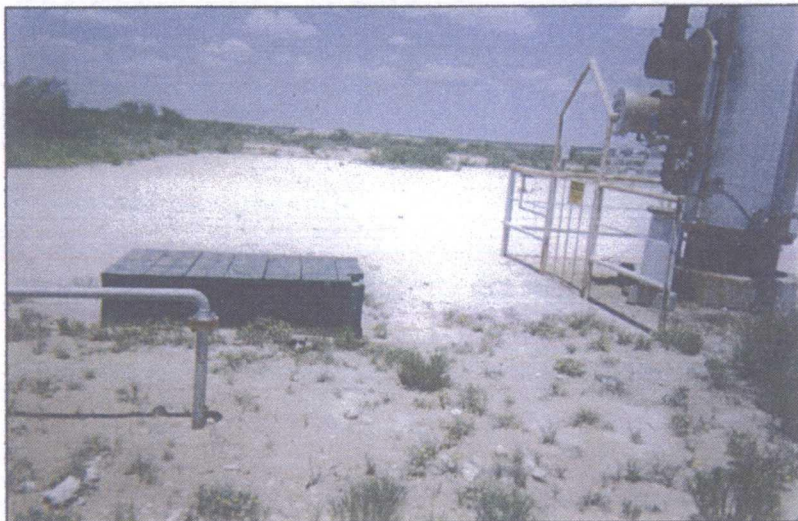
I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

DATE 10/8/2003 PRINTED NAME Kristin Farris

SIGNATURE *Kristin Farris* TITLE Project Scientist

EME Felton 'A' EOL

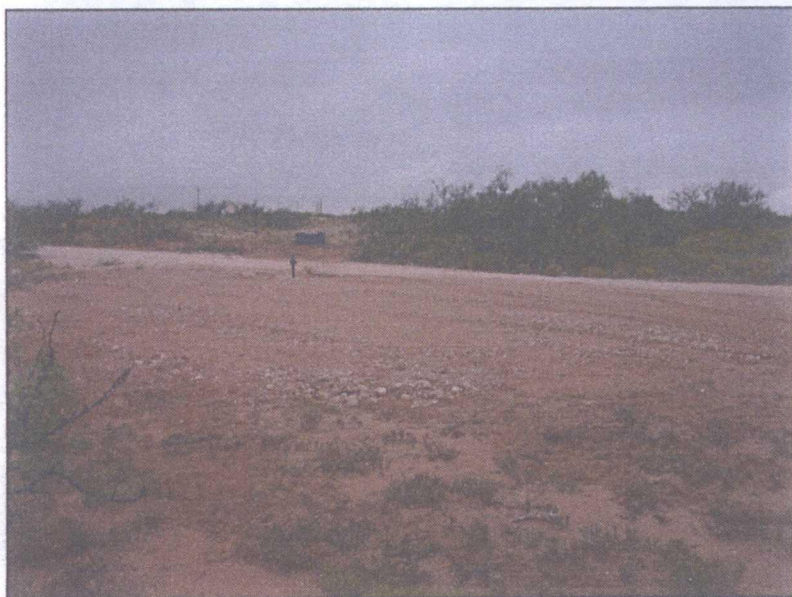
August 2003



Old Junction Box Before NORM Removal



20 x 15 x 12-ft deep Excavation



Backfilled with New Box in Background



New Junction Box 100 ft Northwest

ET6I

Junction box final report / Bottom 14 well 15 inch composite
SITE EXCAVATION INFORMATION

EME Dry Felton A Est

DATE DEPTH CL PID TPH SOIL COMPOSITION

LAB CT

Lab C	8-12-03 Bottom 12'	386	34.1	368	
Lab C	8-18-03 4-Well	387	21.6	320	
Lab C	8-18-03 5 inch pipe	429	18.1	64	
Lab C	8-12-03 N.W. Well	446	30.9		
Lab C	8-12-03 L.W. Well	10365	29.4		
Lab C	8-12-03 E. Well	110526	29.4		

Gay Stuk



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PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

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

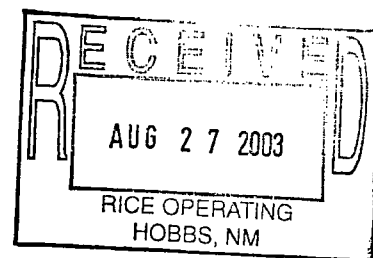
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Reporting Date: 08/26/03
Project Number: NOT GIVEN
Project Name: NOT GIVEN
Project Location: NOT GIVEN

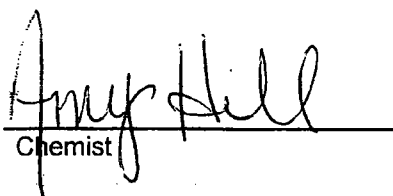
Analysis Date: 08/26/03
Sampling Date: 08/25/03
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: AH

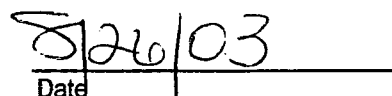
LAB NUMBER	SAMPLE ID	Cl ⁻ (mg/Kg)
H7946-1	OXY FELTON "A" EOL 4 SIDE WALL COMP.	320
Quality Control		1070
True Value QC		1000
% Recovery		107
Relative Percent Difference		1.9

METHOD: Standard Methods 4500-Cl⁻B

Note: Analysis performed on w/v aqueous extract.




Chemist


Date

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h7946



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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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* Cardinal cannot accept verbal changes. Please fax written changes to 915-873-7020.

[illegible]

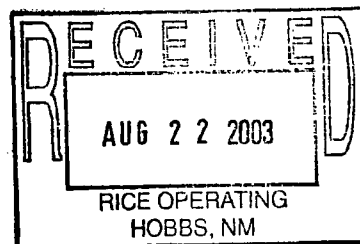


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ANALYTICAL RESULTS FOR
RICE OPERATING CO.
ATTN: ROY R. RASCON
122 W. TAYLOR
HOBBS, NM 88240
FAX TO:



Receiving Date: 08/19/03
Reporting Date: 08/20/03
Project Number: NOT GIVEN
Project Name: EME OXY FELTON "A"
Project Location: NOT GIVEN

Sampling Date: 08/18/03
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (>C ₁₀ -C ₂₈) (mg/Kg)	Cl* (mg/Kg)
		08/19/03	08/19/03	08/20/03
H7926-1	BACKFILL 5 PT. COMP.	<10.0	<10.0	64**
Quality Control		779	752	1050
True Value QC		800	800	1000
% Recovery		97.3	94.0	105
Relative Percent Difference		0.7	8.1	5.0

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

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

**Matrix interference (color) observed.

Chemist

Burgess R. Cash

Date

8/20/03

H7926.XLS

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Sampler Relinquished: <i>ETGI</i> <i>Carry Stank</i> Relinquished By:		Date: <i>8/19/03</i> Time: <i>4:51</i>		Received By: Date: <i>08/19/2003</i> Time: <i>4:55P</i>		Received By: (Lab Staff) <i>[Signature]</i>		Sample Condition Cool <input type="checkbox"/> Intact <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		CHECKED BY: (Initials)	
Delivered By: (Circle One) <u>Sampler</u> - UPS - Bus - Other:											

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

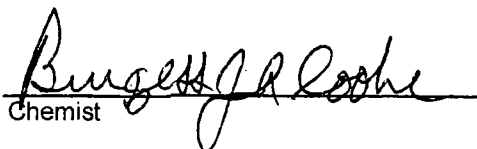
Receiving Date: 08/12/03
Reporting Date: 08/13/03
Project Number: NOT GIVEN
Project Name: OXY FELTON A EOL
Project Location: EME

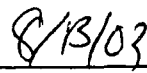
Sampling Date: 08/12/03
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (>C ₁₀ -C ₂₈) (mg/Kg)	CI* (mg/Kg)
		08/12/03	08/12/03	08/13/03
H7907-1	W. WALL	<10.0	<10.0	400
Quality Control		779	752	1000
True Value QC		800	800	1000
% Recovery		97.3	94.0	100
Relative Percent Difference		0.7	8.1	3.0

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.


Chemist


Date

H7907.XLS

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PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

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

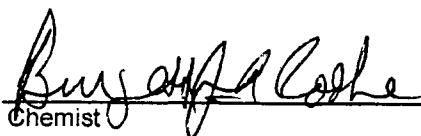
Receiving Date: 08/12/03
Reporting Date: 08/13/03
Project Number: NOT GIVEN
Project Name: OXY FELTON A EOL
Project Location: EME

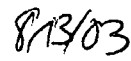
Sampling Date: 08/12/03
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (>C ₁₀ -C ₂₈) (mg/Kg)	Cl* (mg/Kg)
		08/12/03	08/12/03	08/13/03
H7905-1	N. WALL	<10.0	<10.0	400
Quality Control		779	752	1000
True Value QC		800	800	1000
% Recovery		97.3	94.0	100
Relative Percent Difference		0.7	8.1	3.0

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

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


Chemist


Date

H7905.XLS

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Relinquished By:  Delivered By: (Circle One) Sampler - UPS - Bus - Other:		Date: Time: Received By: (Lab Staff)  Sample Condition: Cool Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No CHECKED BY: (Initials)		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #: Add'l Fax #: REMARKS:	
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ANALYTICAL RESULTS FOR
RICE OPERATING CO.
ATTN: KRISTIN FARRIS
122 W. TAYLOR
HOBBS, NM 88240
FAX TO: (505) 397-1471

Receiving Date: 08/12/03

Reporting Date: 08/13/03

Project Number: NOT GIVEN

Project Name: NOT GIVEN *Oxy Felton "A"*

Project Location: NOT GIVEN *Rev. R. Peterson*

Sampling Date: 08/12/03

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: BC

Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	GRO	DRO	CI*
		(C ₆ -C ₁₀) (mg/Kg)	(>C ₁₀ -C ₂₈) (mg/Kg)	(mg/Kg)
ANALYSIS DATE		08/12/03	08/12/03	08/13/03
H7906-1	E. WALL	<10.0	<10.0	272
Quality Control		779	752	1000
True Value QC		800	800	1000
% Recovery		97.3	94.0	100
Relative Percent Difference		0.7	8.1	3.0

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.

Bryan A. Leathe
Chemist

8/13/03
Date

H7906.XLS

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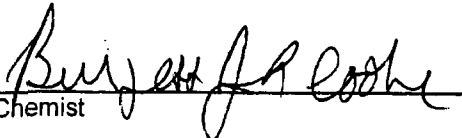
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Reporting Date: 08/13/03
Project Number: NOT GIVEN
Project Name: OXY FELTON A EOL
Project Location: EME

Sampling Date: 08/12/03
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (>C ₁₀ -C ₂₈) (mg/Kg)	Cl* (mg/Kg)
		08/12/03	08/12/03	08/13/03
H7904-1	BOTT. COMPOSITE / 2'	<10.0	<10.0	368
Quality Control		779	752	1000
True Value QC		800	800	1000
% Recovery		97.3	94.0	100
Relative Percent Difference		0.7	8.1	3.0

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

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


Chemist

8/13/03
Date

H7904.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.



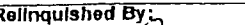

(915) 673-7001 Fax (915) 673-7020 (505) 393-2326 Fax (505) 393-2476

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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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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 collections, including attorney's fees.

Sampler Relinquished: Relinquished By:  Delivered By: (Circle One) Sampler: UPS - Bus - Other:		Date: 8/12/03 Time: 4:50 Received By: (Lab Staff)  Sample Condition: Cool Intact: <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> No		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #: Add'l Fax #: REMARKS:	
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† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476.



Current Photodocumentation

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

EME Felton 'A' EOL (1R427-38)
Unit Letter F, Section 28, T21S, R36E



Facing East

12/17/2012



Facing South

12/17/2012