

1R - 427-30

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, February 04, 2013 4:58 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 (1R427-30) Termination - ROC EME F-1 Site

**RE: Termination Request
for the Rice Operating Company's
EME F-1 Site
Unit Letter F, Section 1, T21S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-30) 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 25, 2013 (received January 28, 2013) and the "Final Report," dated November 26, 2003. The reports are acceptable to the OCD.

The above-referenced reports, submitted in accordance with 19.15.29 NMAC (Rule 29; formally, Rule 116), indicate that Rice Operating Company has met the requirements of 19.15.29 NMAC; therefore, the OCD approves the reports and hereby notifies you that the remediation plan (1R427-30) is terminated in accordance with 19.15.29 NMAC.

Please be advised that OCD approval of these reports 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 8777

January 25, 2013

RECEIVED

JAN 25 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

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

RE: Termination Request
EME F-1 (1R427-30): UL/F Sec. 1, T21S, R35E
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 F-1 junction box. The site is located in UL/F, Sec. 1, T21S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 133 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 10 x 10 x 9 ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in chloride concentrations that decreased with depth. 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 for analysis of chloride and TPH, resulting in a sidewall chloride concentration of 640 mg/kg and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The bottom composite resulted in a chloride concentration of 624 mg/kg and GRO and DRO concentrations below detectable limits. The remediated backfill resulted in a chloride concentration of 688 mg/kg and concentrations of GRO and DRO below detectable limits. The remediated soil was returned to the excavation to ground surface and contoured to the surrounding area. A

new, water-tight junction box was built 80 ft north of this site. The former junction box was located next to a lease road and pad; therefore, seeding was not necessary.

The junction box site location map, final report, photodocumentation, 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 flourish at the end.

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

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	F-1	F	1	21S	35E	Lea	Length	Width	Depth
							moved 80 ft north		

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

Depth to Groundwater 133 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 10/18/2003 Date Completed 11/24/2003 OCD Witness No.

Soil Excavated 33 cubic yards Excavation Length 10 Width 10 Depth 9 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 11/19/2003 Sample Depth 9 ft bgs

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	0.0	<10.0	<10.0	640
BOTTOM	0.0	<10.0	<10.0	624
REMEDIATED	0.0	<10.0	<10.0	688

CHLORIDE FIELD TESTS

General Description of Remedial Action: This junction box was located 5 ft North

of a production battery. Healthy vegetation surrounds the box and battery. The junction
was delineated vertically and laterally with a backhoe and soil was tested regularly for chloride
and hydrocarbon impact. Chloride concentrations exhibited vertical and lateral
declines (see graphs). All PID readings were 0.0 at this site and lab results confirmed that TPH
impact is nonexistent. The excavated soil from the 10 x 10 x 9-ft-deep hole was blended at the
location and then backfilled. The disturbed surface is expected to naturally re-vegetate. The
new water-tight junction box has been built 80 ft north of this location.

enclosures: chloride graphs, photos, lab results, diagram, PID readings

LOCATION	DEPTH (ft)	PPM
vertical @ jct.	5	754
	6	858
	7	828
	8	754
	9	655
	10	604
	11	446
	12	377
bottom comp.	9	504
4-wall comp.	n/a	625
remed. comp.	n/a	575

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

DATE 11/26/2003 PRINTED NAME Kristin Farris

SIGNATURE Kristin Farris TITLE Project Scientist

EME jct. F-1



Wooden Junction Box Before NORM Removal 7/25/2003



After Wood and NORM Removal 11/18/2003



10 x 10 x 9 ft Excavation 11/19/2003



New Junction Box Construction 80 ft North



**Backfilled Excavation in Foreground
New Junction Box 80 ft North in Background**



PHONE (325) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

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: 11/21/03
Reporting Date: 11/24/03
Project Number: NOT GIVEN
Project Name: EME F-1
Project Location: LEA CO., NM

Sampling Date: 11/19/03
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)
ANALYSIS DATE		11/21/03	11/21/03	11/21/03
H8195-1	BOTTOM 9'	<10.0	<10.0	624
H8195-2	REMEDIA TED BACKFILL	<10.0	<10.0	688
H8195-3	4 WALL COMP.	<10.0	<10.0	640
Quality Control		777	837	1000
True Value QC		800	800	1000
% Recovery		97.2	105	100
Relative Percent Difference		7.3	6.1	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.

Burton J. Cohen
Chemist

11/24/03
Date

H8195.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) 393-2470

Page of

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



ENVIRONMENTAL TECHNOLOGY GROUP, INC.

2540 WEST MARLAND

HOBBS, NEW MEXICO 88240

PHONE: (505) 397-4882 FAX: (505) 397-4701

VOC FIELD TEST REPORT FORM

MINI RAE PLUS CLASSIC PHOTOIONIZATION GAS DETECTOR

MODEL NO: PGM 761S

SERIAL NO: 103999

CALIBRATION GAS

GAS COMPOSITION: ISOBUTYLENE
AIR

100 PPM

BALANCE

LOT NO: 67401

FILL DATE: 11-19-03

EXP. DATE: 11/04

ACCURACY: 100ppm ± 2%

METER READING

ACCURACY: 100.1

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
EME	F-1	F	1	21	35

SAMPLE	PID RESULT	SAMPLE	PID RESULT
External		Composite	
5' North		10' x 10' x 9'	
9'	0.0	Remediated	
5' South		biofilter	0.0
9'	0.0		
5' West		bottom 9'	0.0
9'	0.0		
5' East		4 Wall	0.0
9'	0.0		
	0.0	North Wall	0.0
		South Wall	0.0
		West Wall	0.0
		East Wall	0.0

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

Kerry Mark
Signature

Field Tech
Title

11-19-03
Date



Current Photodocumentation

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

EME F-1 (1R427-30)
Unit Letter F, Section 1, T21S, R35E



Facing North

1/15/2013



Facing South

1/15/2013