

Hansen, Edward J., EMNRD

From:	Hansen, Edward J., EMNRD
Sent:	Monday, February 04, 2013 4:58 PM
То:	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)</kjones@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

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 20 2013

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 concentration of 688 mg/kg and concentrations of GRO and DRO 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

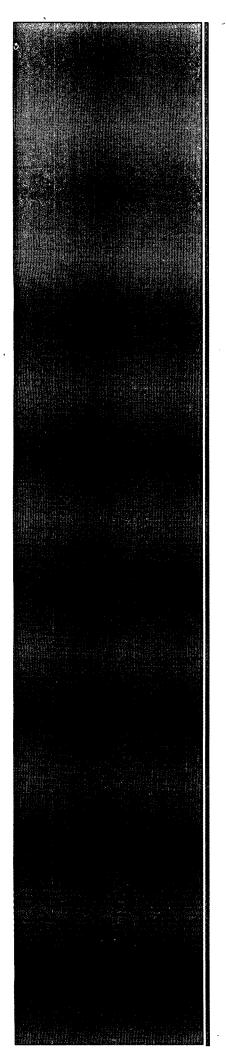
Site investigation demonstrates that residual chloride and hydrocarbons in the vadose zone will not with reasonable probability contaminate groundwater in excess of NMOCD standards. This site meets the requirements of the NMOCD-approved Revised Junction Box Upgrade Work Plan (July 16, 2003). As such, 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

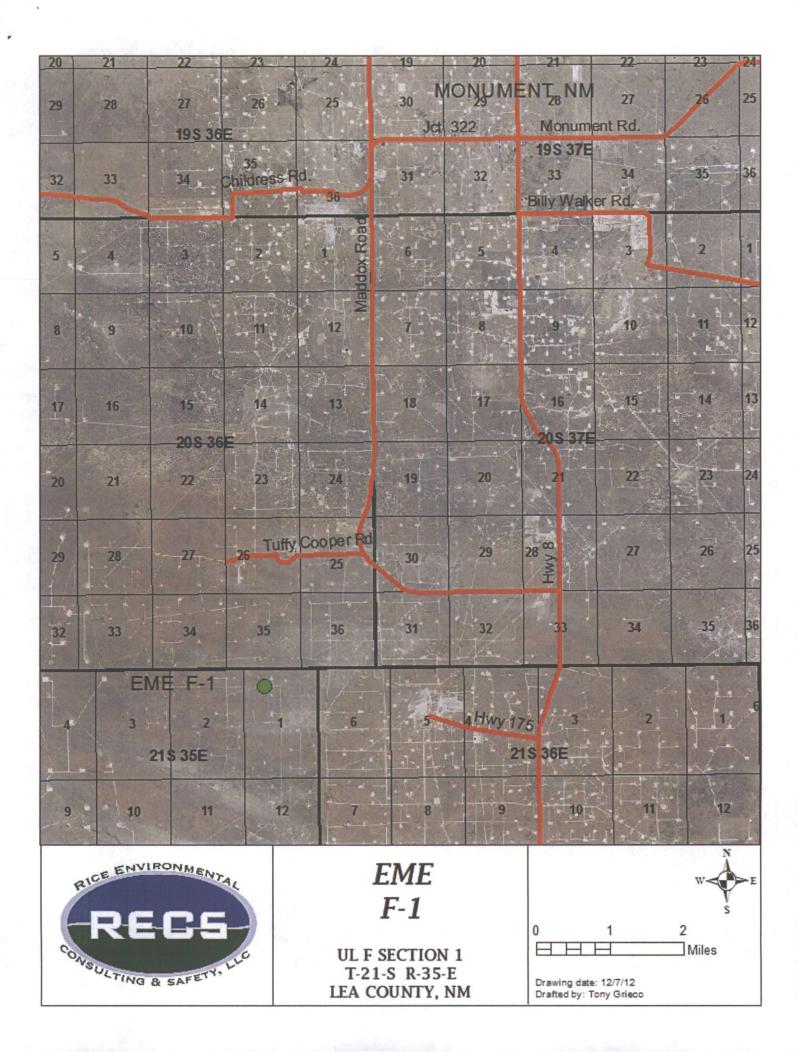
Hack Conder Environmental Manager

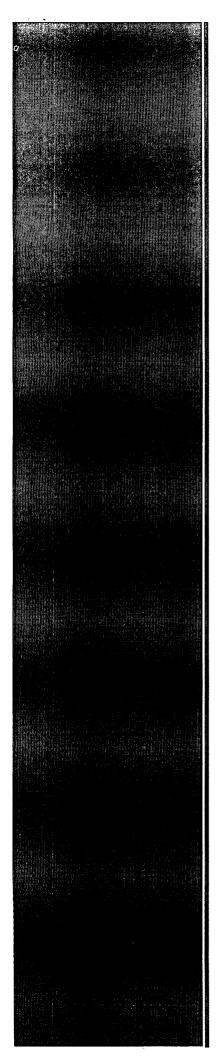
enclosures



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 LOC	ATION					
SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DI	MENSIONS	- FEET	
EME	F-1	F	4	21S	35E	Lea	Length	Width	Depth	
	F-1			213	30E		m	moved 80 ft north]
LAND TYPE:	3LM	STATE	FEE LA	NDOWNER			OTHER_			
Depth to Grour	ndwater	133	feet	NMOCD	SITE ASSE	SSMENT	RANKING S		0	
Date Started	10/18	/2003	Date Cor	npleted	11/24/2003		Witness		No	
Soil Excavated	33	cubic yar	ds Exc	avation Le	ngth <u>10</u>	Width	10	Depth	9	_feet
Soil Disposed	0	cubic yai	ds Off	site Facility	n/	a	_ Location _		n/a	
	TICAL F	ESULTS	: Sample	e Date	11/19/20	003	Sample De	pth	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	<u>PID</u> ppm	<u>GRO</u> mg/kg	DRO mg/kg	<u>Chloride</u> 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 back	noe 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	e 10 x 10 x 9-ft-deep hole was blended at the					
location and then backfilled. The disturbed surface	ce is expected to naturally re-vegetate. The					
new water-tight junction box has been built 80 ft no	orth of this location.					
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n na	······································					

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

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

nol Dependention of Demonstral Autions - million

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	Knistin Annia	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 (>C₁₀-C₂ଃ) (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 REMEDIATED BACKFILL	<10.0	<10.0	688
H8195-3 4 WALL COMP.	<10.0	<10.0	640
Quality Control	777	007	1000
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; CI: Std. Methods 4500-CI B *Analyses performed on 1:4 w.v aqueous extracts.

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, the constraint of the applicable of the applicable between the profile of the applicable of the appli 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.

CITAIN OF-CUSTODY AND ANALYSIS REQUEST

ARDINAL LABORATORIES, INC. 2111 Beechwood, Abilene, TX 79603 - 101 East Marland, Hobbs, MM (10-240) (915) 673-7001 Fax (915) 673-7020 (505) 393-2326 Fax (505) 393 2470 Page of Company Hame: RICE Aperating Company Project Manager: Kristin Farris ANALYSIS REQUEST BILL YO POR adhoss: 122 W. Taylor Company: RICE state: MM ZID: 88240 Attn: Humu #: 343-9174 Fax #: 397-1471 Address: ranjact#. Projact Owner: City: Project Hame: Ems F-1 state: Zhe /cs Phona #: Project Locution: Gary Sterle Samplar Nanio: Fax∦: MATRIX IPRESERVI SAMPING FOR 149 I VE CHTY imo(c) Sample I.D. 1 ab 1.D. IGROUNDV ISLUDGE WASTE ISOIL ICRUDE 0 DATE: TIME 148-195-1 11/19 Bottom ?' Remedited backfill G 1:15 X 1/19 1:32 X V 1/15 2110 Ø. х فلافت اللهروج بالالات والبالية وركب بتركب فريك لتكرف اللاش والتركية فكا 30 days past due of the tale of 24% per arreats from the pricinal data of th bate for behierst or conserveral deamyse, bubility willing his solon, be والمربع والمربية والمتعرفية ليعاملهم والمراجع والمراجع ate of collection. Achieve of converts has Sampler Rollinguished: rendse huorste by Cerdend, reperders of shall ar such dain to based spon | Date: | Received By: Phone Result: I Yes CI No Add Phone Hay Rosuk: REMARKS: I Yes I No Add'| Fax #: Time: Fax - copy to rice Date: 11/21 Rollnquished By: Received By: (Lab Staff) Fime: 7:45 Control By: (Circle One) Sample Condition Cool Intact CHECKED BY: (hildala) Yes Yes Sampler - UPS - Bus - Other: ิยก

| 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 CALIBRATION GAS GAS COMPOSITION: ISOBUTYLENE AIR

LOT NO: 67907 EXP. DATE: 7697 METER READING ACCURACY: 60.7 SERIAL NO: 103999

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
EME	F-1	~	1	æ1	-25

SAMPLE	PID RESULT	SAMPLE	PID RESULT
Latorail		Composite	
5 North	·····	10'110'19'	
91	0.0	Remedited	·
3- South		bulit.in	0.0
<i></i>	0.0		
5' West		Gottom ?'	0.0
9'	0.0		
5'Est		4 Well	0.0
<i>\$</i> '	0.0		
	@.	North wall	C.S
		South walk	0.0
•	- 	west with	0.0
		First will	0.0

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

Signature

Title

Esel & feel

Date

19-03

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