

1R - 427-348

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, February 06, 2013 6:12 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 (1R427-348) Termination - ROC EME O-13 EOL Site

**RE: Termination Request
for the Rice Operating Company's
EME O-13 EOL Site
Unit Letter O, Section 13, T20S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-348) 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 February 1, 2013 (received February 4, 2013). The reports are 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 (1R427-348) 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 OCD
2013 FEB -4 P 1:28

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8807

February 1, 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 O-13 EOL (1R427-348): UL/O, Sec. 13, T20S, 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 2010, ROC initiated work on the former O-13 EOL junction box. The site is located in UL/O, Sec. 13, T20S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 32 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x3x7-ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in low concentrations of each. The 7 ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of <16 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The excavated soil was returned to the excavation and contoured to the surrounding area. On 11/12/2010, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate. A junction box is no longer needed at the site.

The junction box site location map, final report, photodocumentation, laboratory analysis, PID sheet, chloride graph 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.

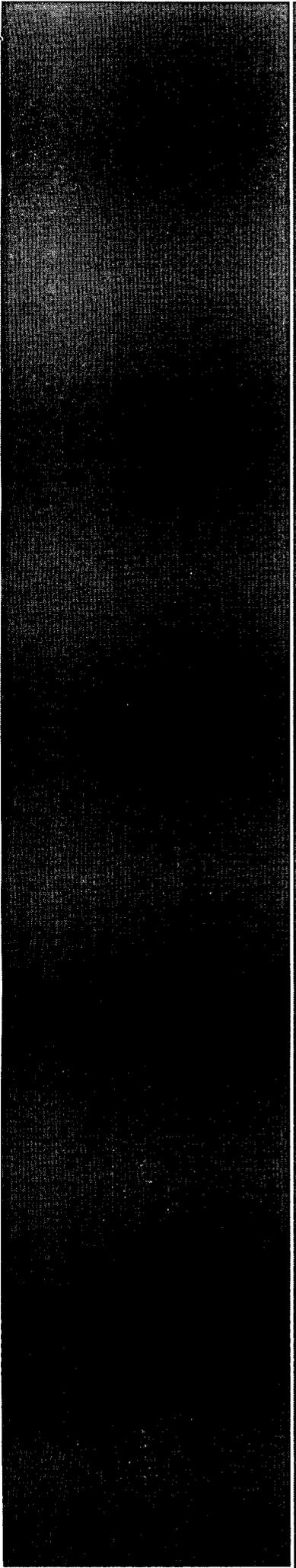
Please contact me at (575)393-9174 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,
RICE Operating Company

A handwritten signature in black ink, appearing to read "H. Conder", with a long horizontal flourish extending to the right.

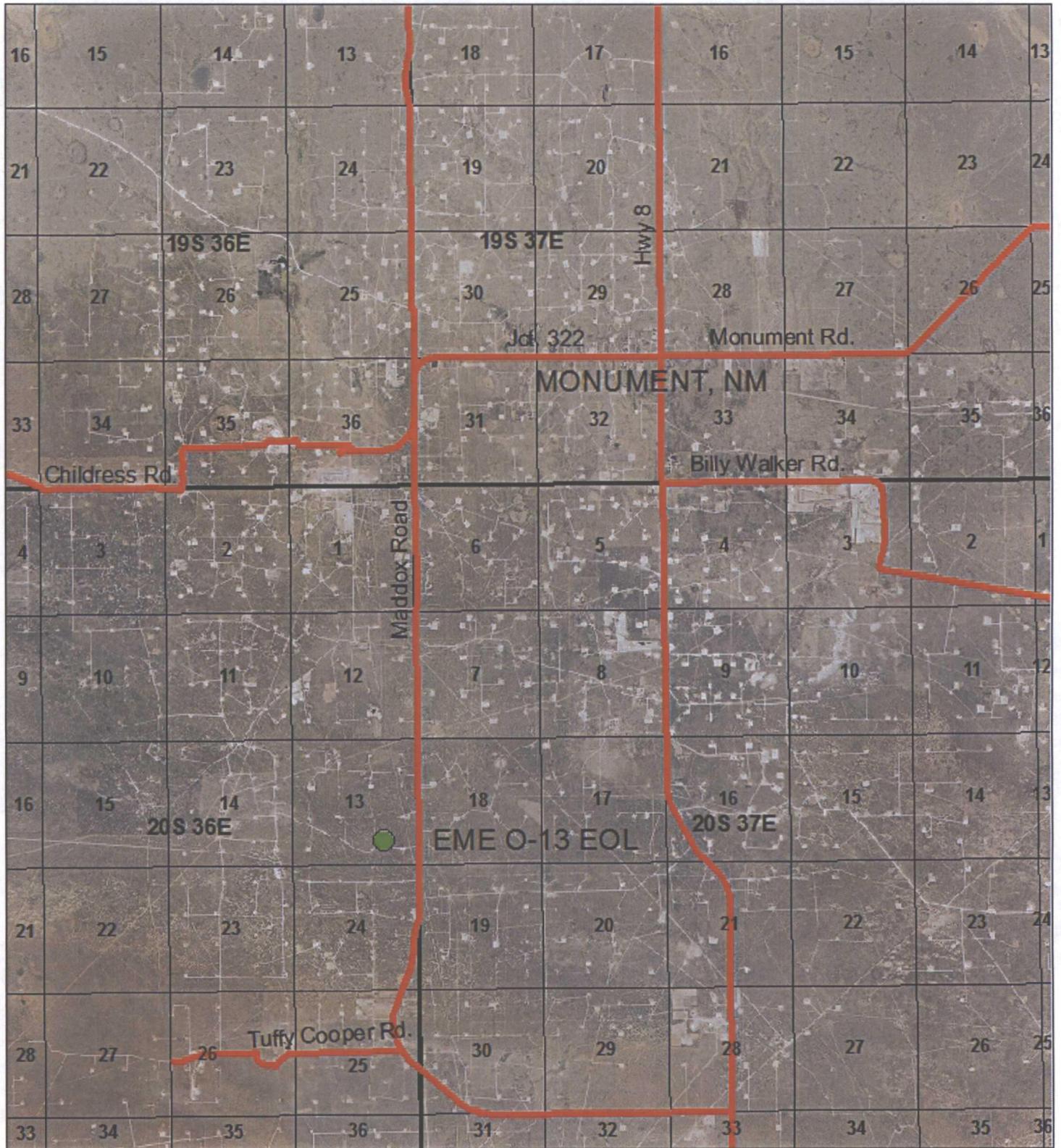
Hack Conder
Environmental Manager

enclosures



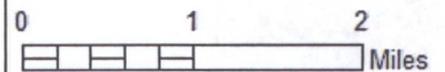
Site Location Map

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

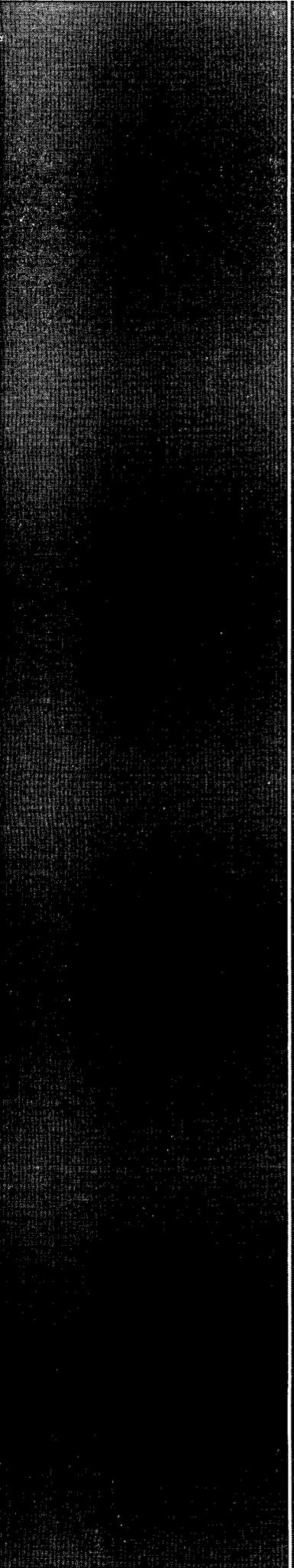


EME O-13 EOL

UL O SECTION 13
T-20-S R-36-E
LEA COUNTY, NM



Drawing date: 1/21/13
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

EME O-13 EOL

Unit O, Section 13, T20S, R36E



Delineation trench being dug

6/15/2010



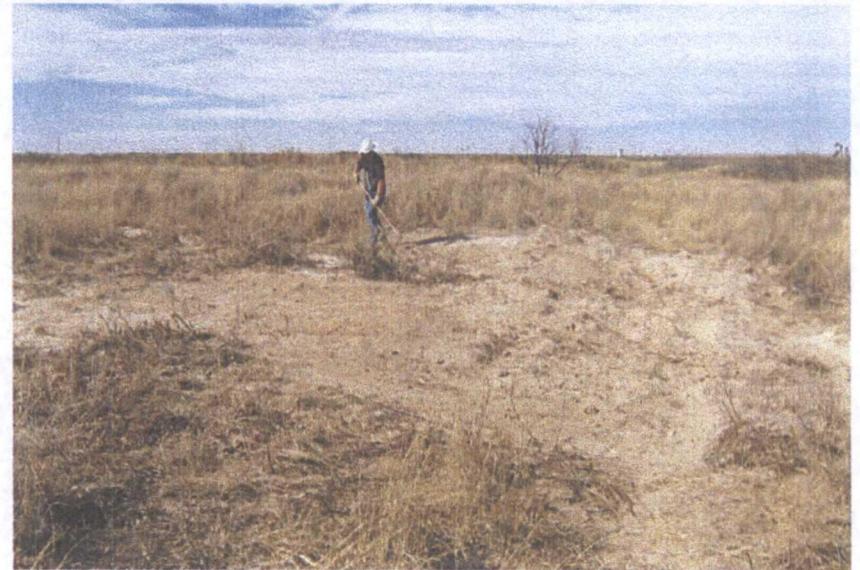
Final excavation

6/15/2010



Seeding site

11/12/2010



Covering seed

11/12/2010



ANALYTICAL RESULTS FOR
 RICE OPERATING COMPANY
 ATTN: BRUCE BAKER
 112 W. TAYLOR
 HOBBS, NM 88240

Receiving Date: 06/15/10
 Reporting Date: 06/17/10
 Project Number: NOT GIVEN
 Project Name: EME O-13 EOL (20/36)
 Project Location: EME O-13 EOL (20/36)

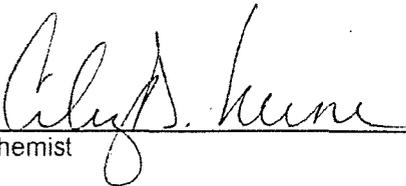
Sampling Date: 06/15/10
 Sample Type: SOIL
 Sample Condition: COOL & INTACT
 Sample Received By: JH
 Analyzed By: AB/HM

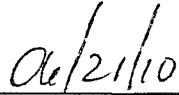
	GRO	DRO	
	(C ₆ -C ₁₀)	(>C ₁₀ -C ₂₈)	CI*
	(mg/kg)	(mg/kg)	(mg/kg)

LAB NUMBE	SAMPLE ID	ANALYSIS DATE	06/16/10	06/16/10	06/16/10
H20122-1	SOURCE @ 7'		<10.0	<10.0	< 16
Quality Control			504	460	500
True Value QC			500	500	500
% Recovery			101	92.0	100
Relative Percent Difference			0.2	1.0	< 0.1

COPY

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.
 Reported on wet weight.


 Chemist


 Date

H20122 TCL RICE

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. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

RICE OPERATING COMPANY

122 West Taylor Hobbs, NM 88240

PHONE: (575) 393-9174 FAX: (575) 397-1471

PID METER CALIBRATION & FIELD REPORT FORM

Check Model Number:

Model: PGM 7300 Serial No: 590-000183
 Model: PGM 7300 Serial No: 590-000508
 Model: PGM 7300 Serial No: 590-000504

✓

Model: PGM 7600 Serial No: 110-023920
 Model: PGM 7600 Serial No: 110-013744
 Model: PGM 7230 Serial No: 592-903318

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: <u>928547</u>	EXPIRATION DATE: <u>2/04/2013</u>
FILL DATE:	METER READING ACCURACY: <u>100.1</u>

ACCURACY : +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
<u>EME</u>	<u>0-13 Eo1</u>	<u>0</u>	<u>13</u>	<u>20</u>	<u>36</u>

SAMPLE ID	PID	SAMPLE ID	PID
<u>Back ground @ 6"</u>	<u>∅</u>		
<u>Source @ 3'</u>	<u>∅</u>		
<u>Source @ 4'</u>	<u>∅</u>		
<u>Source @ 5'</u>	<u>∅</u>		
<u>Source @ 6'</u>	<u>∅</u>		
<u>Source @ 7'</u>	<u>∅</u>		

COPY

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

SIGNATURE: Joe Butts

DATE: 6/15/10

CHLORIDE CONCENTRATION CURVE

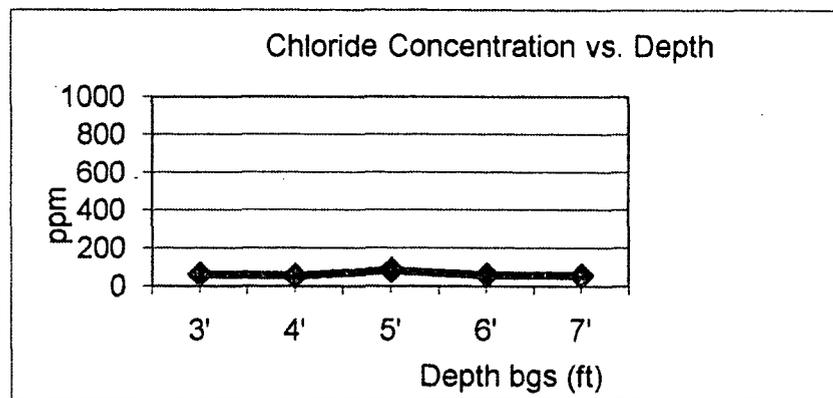
RICE Operating Company

EME O-13 EOL

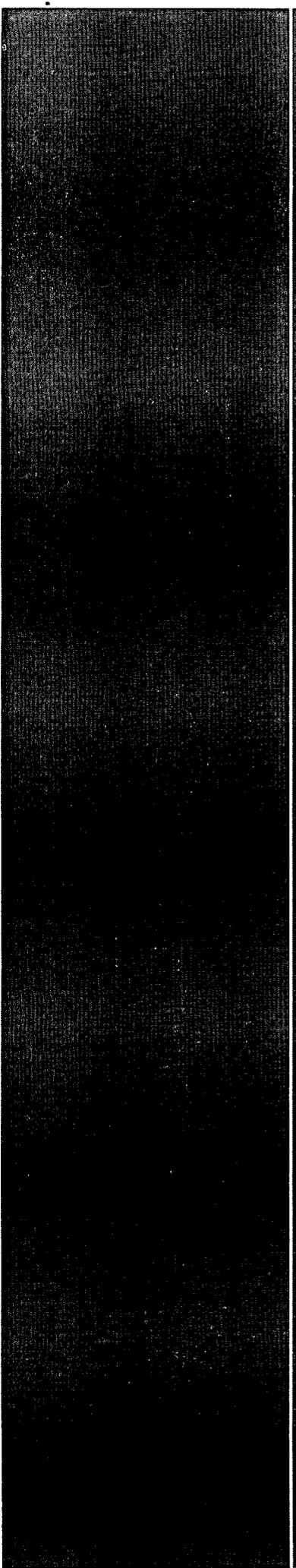
Unit 'O', Sec. 13, T20S, R36E

Backhoe samples at the junction (source)

Depth bgs (ft)	[Cl] ppm
3'	62
4'	54
5'	83
6'	60
7'	57



Groundwater = 32 ft.



Current Photodocumentation

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

EME O-13 EOL (1R427-348)
Unit Letter O, Section 13, T20S, R36E



Facing Northeast

1/30/2013



Facing East

1/30/2013