

1R - 427-349

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, February 27, 2013 5:12 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 (1R427-349) Termination - ROC EME Jct I-1-1 Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct I-1-1 Site
Unit Letter I, Section 1, T20S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-349) 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 14, 2013 (received February 19, 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 (1R427-349) 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*

112 West Taylor • Hobbs, New Mexico 88240

Phone: (575) 393-9174 • Fax: (575) 397-1471

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8845

RECEIVED

February 14, 2013

FEB 10 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 Jct. I-1-1 (1R427-349): UL/I, Sec. 1, 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 I-1-1 junction box. The site is located in UL/I, Sec. 1, T20S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 36 +/- feet. Due to safety concerns, a soil bore was initiated on March 16, 2010 at 9 ft southwest of the former junction box. The boring was advanced to a total depth of 25 ft below ground surface (BGS) with soil samples collected at regular intervals. The 10 ft, 15 ft, and 25 ft BGS samples were analyzed by a commercial laboratory. The 10 ft BGS sample resulted in a chloride concentration of 32 mg/kg, a gasoline range organics (GRO) concentration below detectable limits and a diesel range organics (DRO) concentration of 74.5 mg/kg. The 15 ft BGS sample resulted in a chloride concentration of 32 mg/kg and concentrations of GRO and DRO below detectable limits. The 25 ft BGS sample resulted in a chloride, GRO and DRO concentration below detectable limits. The entire bore hole was plugged with bentonite to ground surface. A new water tight junction box was built in the same location as the former junction box; therefore, seeding was not necessary.

The junction box site location map, final report, photodocumentation, laboratory analysis, PID sheet, soil bore log, 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", written in a cursive style.

Hack Conder
Environmental Manager

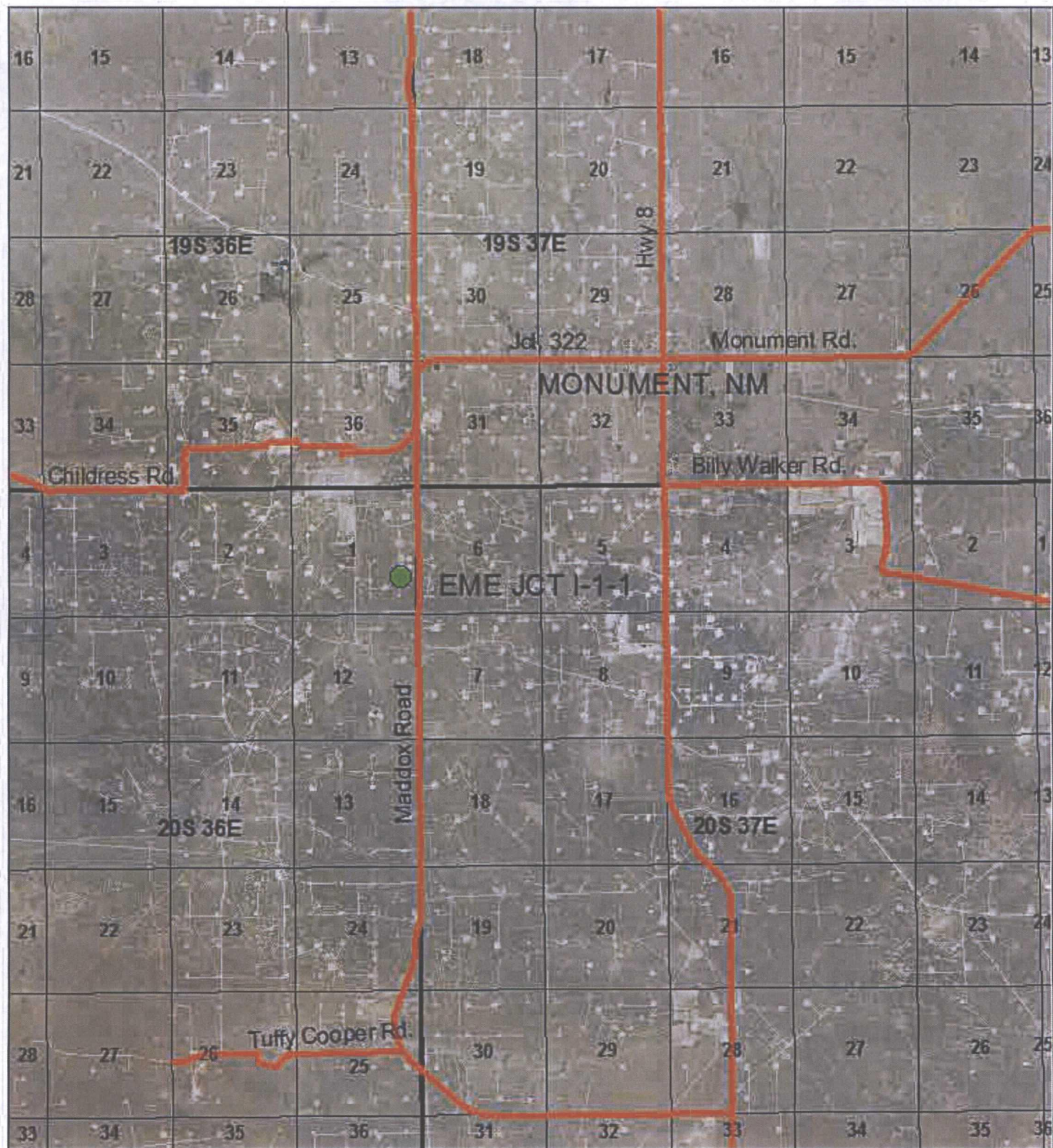
enclosures

RECEIVED OCD
2013 FEB 19 P 3:19



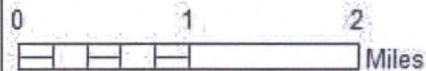
Site Location Map

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



EME JCT I-1-1

UL I SECTION 1
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

RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Eulince-Monument-Eumont (EME)	Jct. I-1-1	I	1	20S	36E	Lea	Length	Width	Depth
							new junction same location		

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

Depth to Groundwater 36 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 3/16/2010 Date Completed 3/16/2010 OCD Witness no

Soil Excavated _____ cubic yards Excavation Length n/a Width n/a Depth 25 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 3/16/2010 Sample Depth 10 ft, 15 ft, 25 ft

Procure 5-point composite sample of bottom and 4-point composite sample of sidewalls. TPH and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines.

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
SB 1 @ 10'	21.9	<10.0	74.5	32
SB 1 @ 15'	0.8	<10.0	<10.0	32
SB 1 @ 25'	0.4	<10.0	<10.0	<16

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
Background	6"	178
Soil bore 9 ft. south-west of former junction box (source)	10'	147
	15'	148
	20'	124
	25'	122

General Description of Remedial Action: This junction was addressed during the pipeline replacement/upgrade program. Due to safety and environmental concerns a soil bore was performed 9 ft. south-west of the former box. The bore was advanced to a depth of 25 ft. BGS with soil samples collected every 5 ft. Chloride field test performed on each sample yielded low concentrations. Organic vapors were measured using a PID, which yielded low concentrations. The 10 ft., 15 ft., and 25 ft. samples were taken to a commercial laboratory for analysis of chloride and TPH, which confirmed low concentrations of each. The entire bore hole was plugged with bentonite to ground surface. A new water tight junction box was built in the same location as the former junction box.

enclosures: photos, lab results, PID (field) screenings, soil bore log, chloride curve

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

SITE SUPERVISOR Lara Weinheimer SIGNATURE [Signature] COMPANY: RICE OPERATING COMPANY

REPORT ASSEMBLED BY Larry Bruce Baker Jr. INITIAL LB

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE Larry Bruce Baker Jr. DATE 8-5-10

EME Jct. I-1-1

Unit I, Section 1, T20S, R36E



Site prior to delineation

3/12/2010



Soil bore # 1

3/16/2010



Plugging soil bore # 1 with bentonite

3/16/2010



New water tight junction box

3/24/2010



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: HACK CONDER
122 W. TAYLOR
HOBBS, NM 88240

Receiving Date: 03/17/10
Reporting Date: 03/22/10
Project Number: NOT GIVEN
Project Name: EME JCT I-1-1
Project Location: EME JCT I-1-1

Sampling Date: 03/16/10
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: JH
Analyzed By: AB/SJ

LAB NUMBER	SAMPLE ID	GRO	DRO	CI*
		(C ₆ -C ₁₀) (mg/kg)	(>C ₁₀ -C ₂₈) (mg/kg)	(mg/kg)

ANALYSIS DATE	03/20/10	03/20/10	03/19/10
H19467-1** SB-1 @ 10'	<10.0	74.5	32
H19467-2 SB-1 @ 15'	<10.0	<10.0	32
H19467-3 SB-1 @ 25'	<10.0	<10.0	<16
COPY			
Quality Control	536	558	500
True Value QC	500	500	500
% Recovery	107	112	100
Relative Percent Difference	1.7	6.6	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.

Reported on wet weight.

**TPH second surrogate outside historical limits due to matrix interference.

Chemist

03/23/10
Date

H19467 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.



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

COPY

Relinquished By: L. Weinheimer	Date: 3-17-10	Received By: Bruce Baker	Phone Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Phone #:
	Time: 7:00 a.m.		Fax Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Fax #:
Relinquished By: Bruce Baker	Date: 3-17-10	Received By: Jodi Benson	REMARKS: email results	
	Time: 4:34 pm		Hconder@riceswd.com; jpurvis@riceswd.com;	
Delivered By: (Circle One) Sampler - UPS - Bus - Other	Sample Condition Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	CHECKED BY: (Initials) JH	Lweinheimer@riceswd.com	

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

NEED SAMPLES BACK, PLEASE

RICE OPERATING COMPANY

122 West Taylor ~ Hobbs, NM 88240

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

PID METER CALIBRATION & FIELD REPORT FORM

CK
MODEL
NO.

✓

MODEL: PGM 7300 SERIAL NO: 590-000183
MODEL: PGM 7300 SERIAL NO: 590-000504
MODEL: PGM 7600 SERIAL NO: 110-12383
MODEL: PGM 7600 SERIAL NO: 110-02920

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 924503	EXPIRATION DATE: 7-5-2010
FILL DATE: 1-7-09	METER READING ACCURACY: 100.0

ACCURACY: +/- 2%

SYSTEM	SITE	UNIT	SECTION	TOWNSHIP	RANGE
EMF	jet I-1-1	I	1	T20S	R36E

SAMPLE ID: 56-1

DEPTH	PID	DEPTH	PID	DEPTH	PID	DEPTH	PID
10'	21.9						
15'	0.8						
20'	0.4						
25'	0.4						

COPY

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

Signature

[Signature]

Date

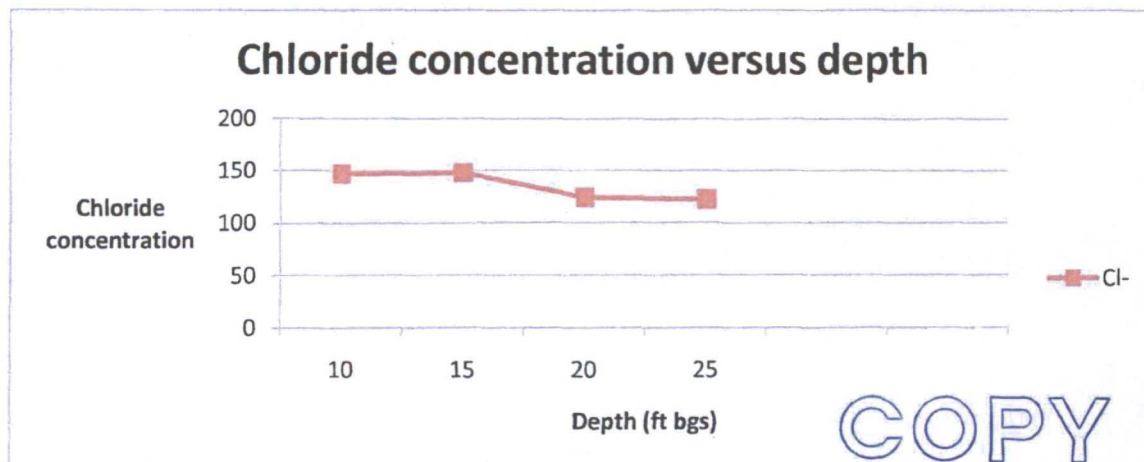
3-16-10

SITE MAP

N ↑

Logger:	Lara Weinheimer			
Driller:	Harrison & Cooper, Inc. Drilling			
Consultant:	N/A - ROC junction box upgrade plan			
Drilling Method:	Air rotary			
Start Date:	3/16/2010			
End Date:	3/16/2010	Project Name: EME jct. I-1-1		Well ID: SB-1
Comments: All samples from cuttings. Located 9 ft SW of the current junction box. Drafted by: Lara Weinheimer TD = 25 ft GW = 36 ft			Location: UL/I sec. 1 T20S R36E Lat: 32°35'56.876"N County: Lea Long: 103°18'5.337" W State: NM	

Depth (feet)	chloride field tests (ppm)	LAB	PID	Description	Lithology	Bore Construction
				5- 10 ft		
				FINE TO MEDIUM SAND; CALICHE		
10	147	CI-32	21.9	greenish-tan, oily, strong hydrocarbon odor		
		GRO <10.0		10 - 15 ft		
		DRO 74.5		VERY FINE TO FINE SAND; CALICHE		
15	148	CI-32	0.8	light orangey-brown, no odor		
		GRO <10.0		15 - 20 ft		
		DRO <10.0		VERY FINE TO FINE SAND; CALICHE		
20	124		0.4	orangey-brown, slightly moist, no odor		
				20 - 25 ft		
25	122	CI-16	0.4	VERY FINE TO FINE SAND		
		GRO <10.0		orangey-brown, slightly moist, no odor		
		DRO <10.0				



CHLORIDE CONCENTRATION CURVE

RICE *Operating Company*

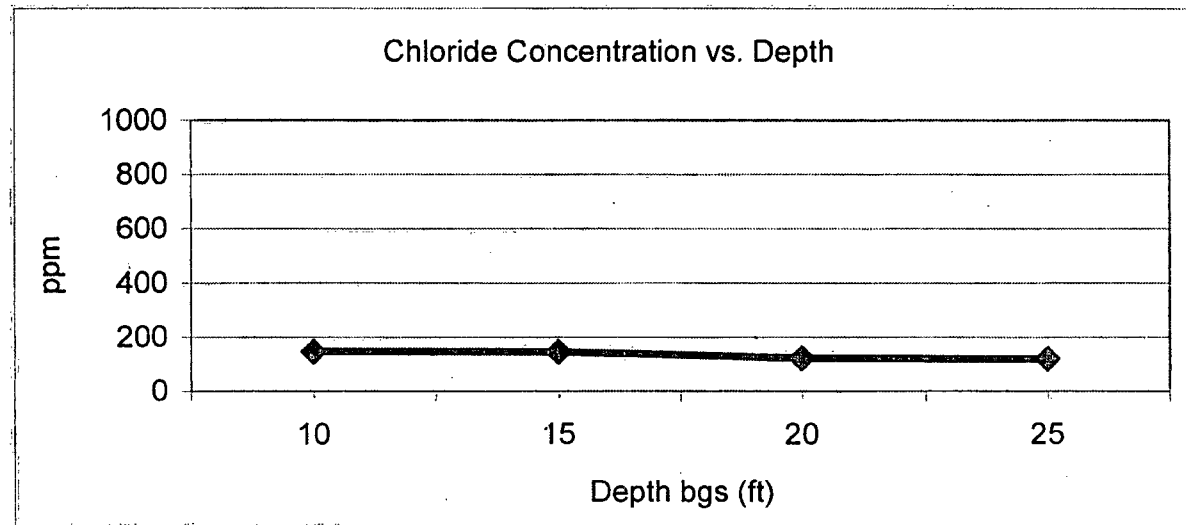
EME Jct. I-1-1

Unit 'I', Sec. 1, T20S, R36E

Soil Bore 9 ft. south-west of former junction

Depth bgs (ft)	[Cl ⁻] ppm
10	147
15	148
20	124
25	122

Groundwater = 36 ft.





Current Photodocumentation

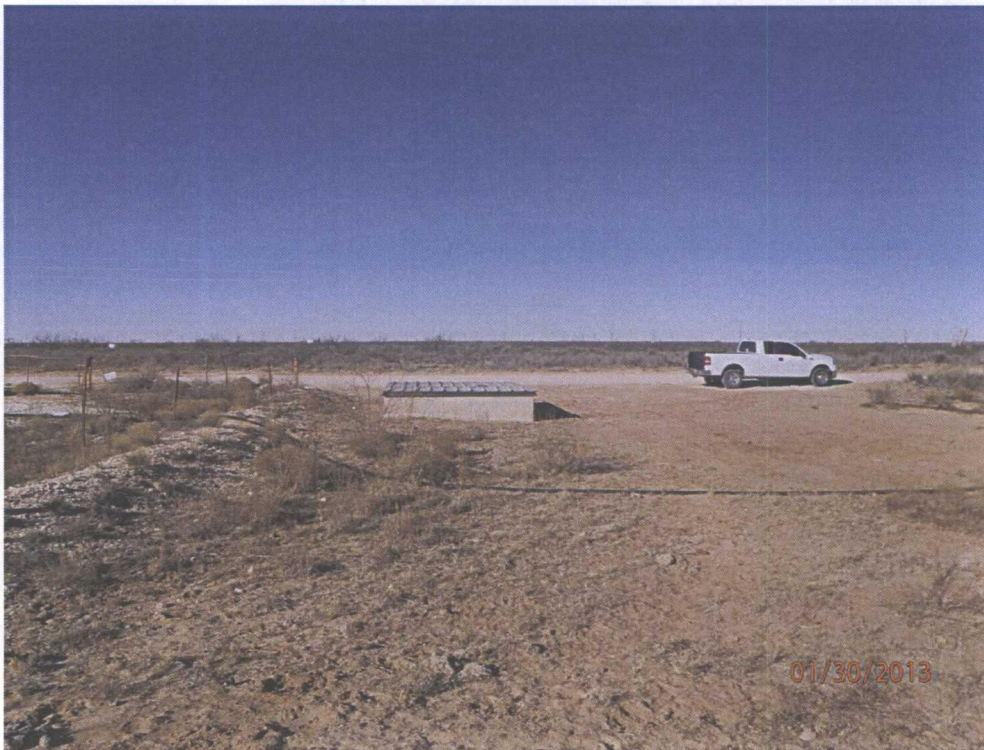
RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471

EME Jct. I-1-1
UL/I, Section 1, T20S, R36E



Facing south

1/30/2013



Facing west

1/30/2013