

1R - 427-328

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, March 07, 2013 3:04 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 (1R427-328) Termination - ROC EME P-25 EOL Site

**RE: Termination Request
for the Rice Operating Company's
EME P-25 EOL Site
Unit Letter P, Section 25, T20S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-328) 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 (1R427-328) 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

February 14, 2013

RECEIVED

FEB 19 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 P-25 EOL (1R427-328): UL/P, Sec. 25, 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 P-25 EOL junction box. The site is located in UL/P, Sec. 25, T20S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 106 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x3x6 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 6 ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride, gasoline range organics (GRO), and diesel range organics (DRO) concentration below detectable limits. The excavated soil was returned to the excavation and contoured to the surrounding area. On 4/13/2010, the site was seeded with a blend of native vegetation. A junction box is no longer needed at the site. Vegetation has rebounded at the site, so no re-vegetation efforts are needed.

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 stylized, sweeping underline.

Hack Conder
Environmental Manager

enclosures

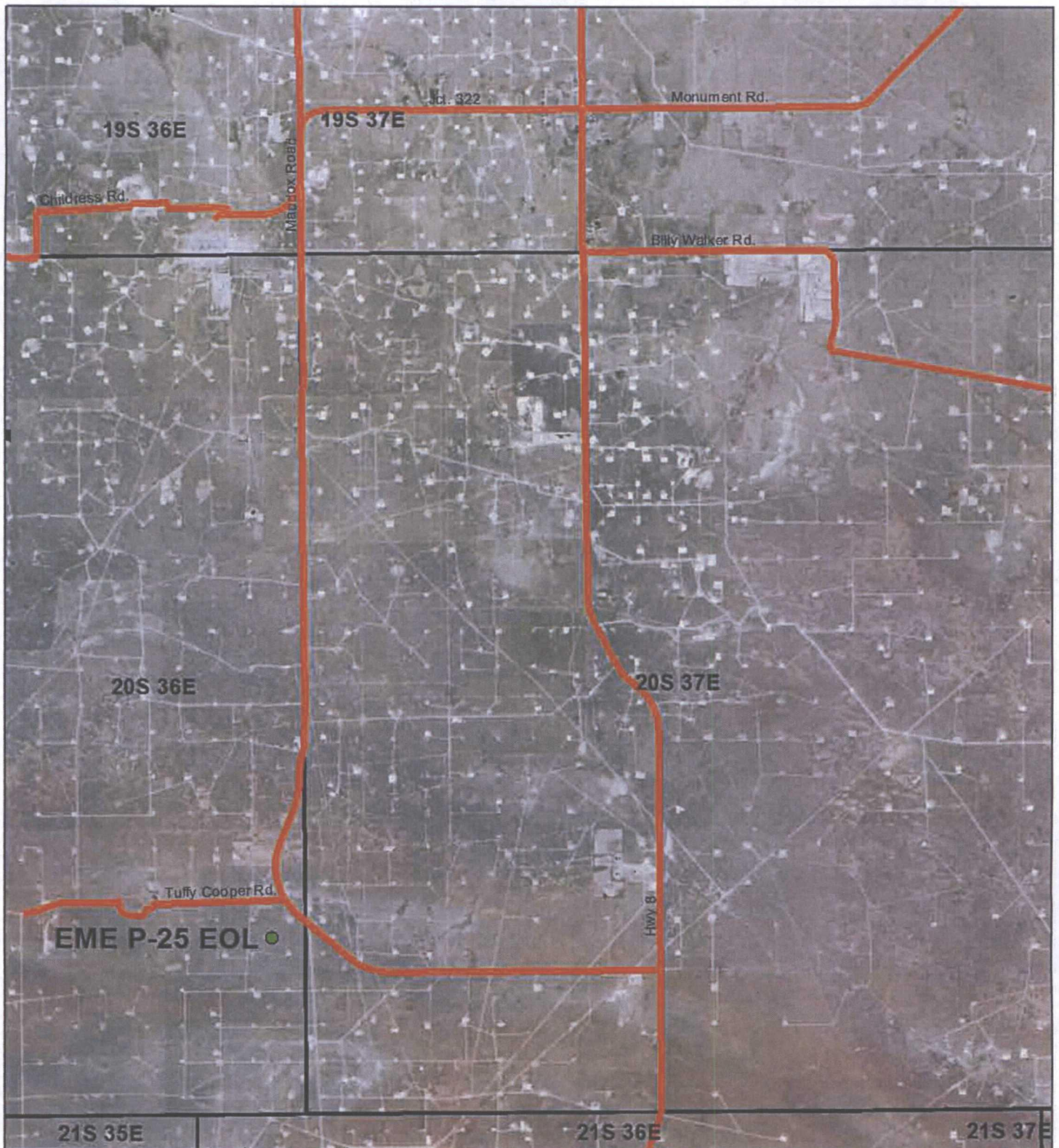
RECEIVED OCD
2013 FEB 19 P 3:19



Site Location Map

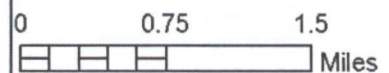
RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471

Site Location



EME P-25 EOL

LEGALS: UL/P sec. 25
T-20-S R-36-E
LEA COUNTY, NM



Drawing date 2/12/13
Drafted by L. Weinheimer



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		
Eunice-Monument-Eumont (EME)	P-25 EOL	P	25	20S	36E	Lea	Length	Width	Depth
							Eliminated		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER Jimmie T. Cooper etux. Betty OTHER _____

Depth to Groundwater 106 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 4/13/2010 Date Completed 4/13/2010 OCD Witness no

Soil Excavated 3.3 cubic yards Excavation Length 5 Width 3 Depth 6 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 4/13/2010 Sample Depth 6 ft

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
SOURCE 6' GRAB	1.1	<10.0	<10.0	<16

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
background	6"	113
vertical delineation trench at the junction (source)	2	95
	3'	85
	4'	87
	5'	89
	6'	113

General Description of Remedial Action: This junction and line were eliminated

during the pipeline replacement/upgrade program. After the former junction box was

removed, an investigation was conducted using a backhoe to collect soil samples at

regular intervals producing a 5X3X6-ft-deep excavation. Chloride field tests performed on

each sample yielded low concentrations similar to that of the background. Organic vapors were measured using a PID, which also

yielded low concentrations. The deepest sample, 6 ft BGS was sent to a commercial laboratory for analysis of chloride and TPH, which

confirmed low concentrations. The excavated soil was returned to the excavation to ground surface and contoured to the surrounding

area. On 4/13/2010, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal

rate.

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

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

SITE SUPERVISOR Jordan Woodfin SIGNATURE *Jordan Woodfin* COMPANY RICE OPERATING COMPANY

REPORT
ASSEMBLED BY Larry Bruce Baker Jr. INITIAL LBB

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE *Larry Bruce Baker Jr.* DATE 8-19-10

EME P-25 EOL

Unit P, Section 25, T20S, R36E



Sampling the source

4/13/10



Final excavation

4/13/10



Backfilling excavation

4/13/10



Seeding excavation

4/13/2010



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

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

Receiving Date: 04/13/10
Reporting Date: 04/19/10
Project Number: NOT GIVEN
Project Name: EME P-25 EOL (20/36)
Project Location: EME P-25 EOL (20/36)

Sampling Date: 04/13/10
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: JH
Analyzed By: AB/HM

LAB NUMBER SAMPLE ID

GRO DRO
(C₆-C₁₀) (>C₁₀-C₂₈) CI*
(mg/kg) (mg/kg) (mg/kg)

ANALYSIS DATE	04/15/10	04/15/10	04/14/10
H19668-1** SOURCE BTM GRAB @ 6FT	<10.0	<10.0	<16
Quality Control	485	564	500
True Value QC	500	500	500
% Recovery	97.0	113	100
Relative Percent Difference	0.1	0.4	<0.1

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.

**One or more TPH surrogates outside historical limits due to matrix interference.

Chemist

Date

H19668 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: <i>Jordan Woodfin</i>		Date: <i>4-12-10</i>	Received By:	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
		Time:		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Relinquished By:		Date: <i>4/13/10</i>	Received By: <i>Jodi Benson</i>	REMARKS:	
		Time: <i>4:07</i>		email results	
Delivered By: (Circle One)		Sample Condition:		jwoodfin@riceswd.com; jpurvis@riceswd.com	
Sampler - UPS - Bus - Other: <input checked="" type="checkbox"/>		Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>		bbaker@riceswd.com	
		CHECKED BY: <i>[Signature]</i>			

† 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

Check Model Number:

<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>

Model: PGM 7300
Model: PGM 7300
Model: PGM 7300

Serial No: 590-000183
Serial No: 590-000508
Serial No: 590-000504

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Model: PGM 7600
Model: PGM 7600
Model: PGM 7600

Serial No: 110-023920
Serial No: 110-013744
Serial No: 110-013676

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 924503	EXPIRATION DATE: 7-5-12
FILL DATE: 7-1-09	METER READING ACCURACY: 98.4

ACCURACY : +/- 2%

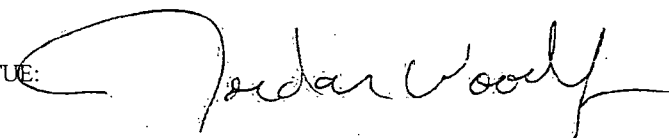
SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	P-25 EOL	P	25	20 S	36E

SAMPLE ID	PID	SAMPLE ID	PID
Source		Background	
2'	3.8	6"	0.2
3'	2.7		
4'	3.0		
5'	3.8		
6'	1.1		

COPY

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

SIGNATURE:



DATE:

4-13-10

CHLORIDE CONCENTRATION CURVE

RICE Operating Company

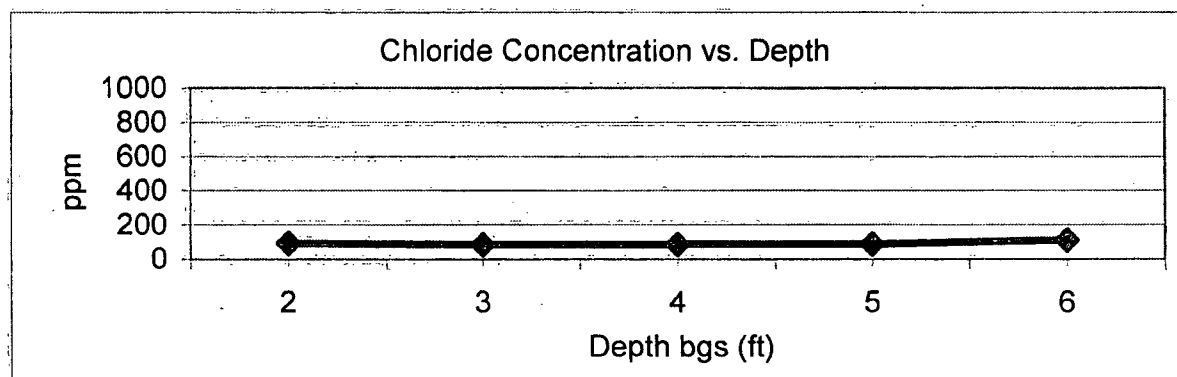
EME P-25 EOL

Unit 'P', Sec. 25, T20S, R36E

Backhoe samples at the junction (source)

Depth bgs (ft)	[Cl ⁻] ppm
2	95
3	85
4	87
5	89
6	113

Groundwater = 106 ft





Current Photodocumentation

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

EME P-25 EOL
UL/P, Section 25, T20S, R36E



Facing west

2/11/2013



Facing south

2/11/2013