

1R - 427-354

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, March 07, 2013 2:13 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 (1R427-354) Termination - ROC EME Jct H-14 Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct H-14 Site
Unit Letter H, Section 14, T20S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-354) 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 (1R427-354) 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. H-14 (1R427-354): UL/H, Sec. 14, 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 H-14 junction box. The site is located in UL/H, Sec. 14, T20S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 20 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x3x12 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 12 ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 32 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 8/19/2010, 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 long horizontal flourish extending to the right.

Hack Conder
Environmental Manager

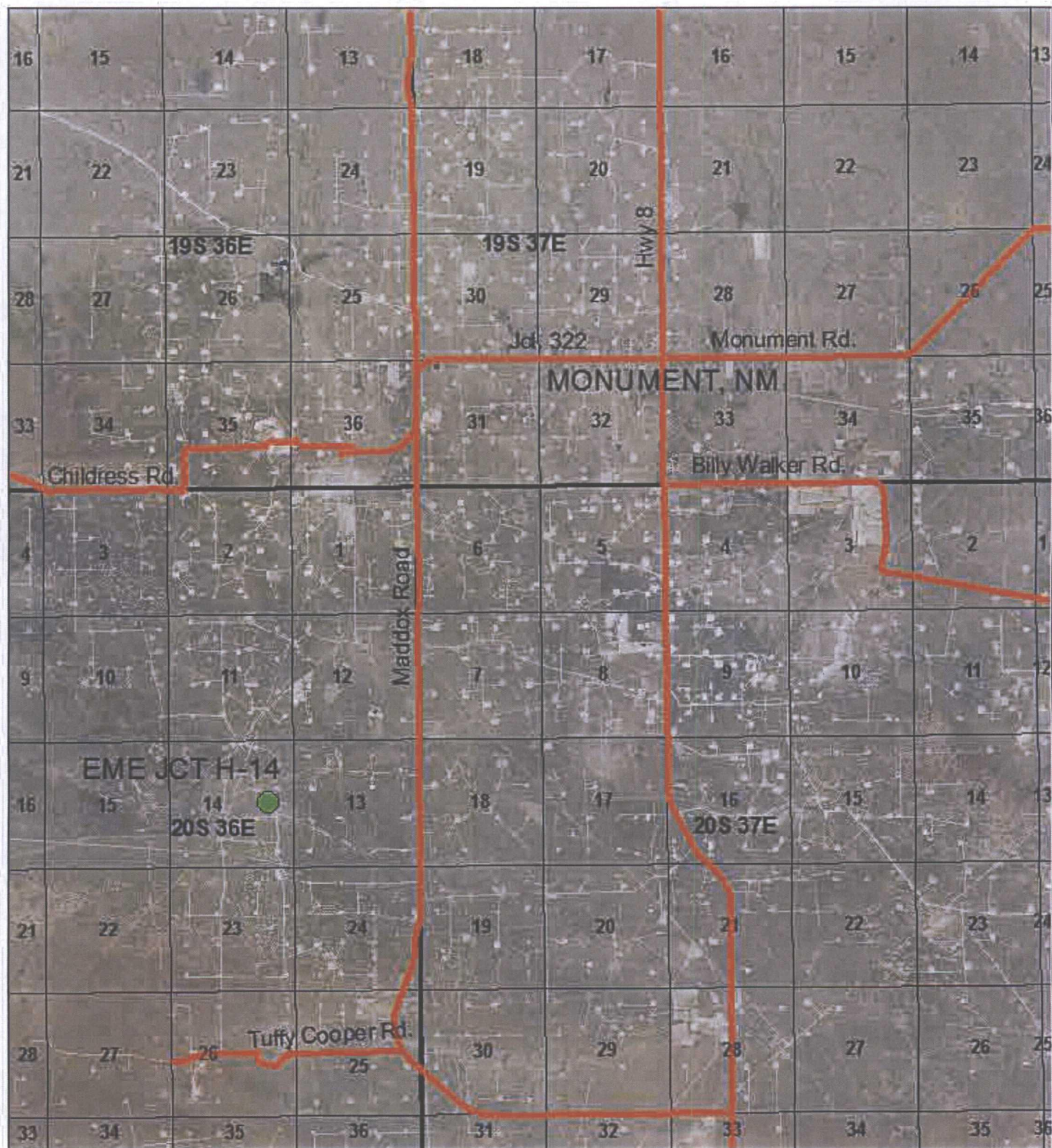
enclosures

RECEIVED OCD
2013 FEB 19 P 3:18



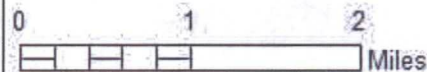
Site Location Map

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



EME JCT H-14

UL H SECTION 14
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		
Eunice Monument Eumont (EME)	Jct. H-14	H	14	20S	36E	Lea	Length	Width	Depth
							Eliminated		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER Jimmie Cooper et ux, Betty-J.T Trust OTHER _____

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

Date Started 6/15/2010 Date Completed 6/25/2010 OCD Witness no

Soil Excavated 6.7 cubic yards Excavation Length 5 Width 3 Depth 12 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 6/15/2010 Sample Depth 12 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 12' GRAB	0.0	<10.0	<10.0	32

CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
background	6"	87
vertical delineation trench at the junction (source)	8'	52
	9'	54
	10'	59
	11'	55
	12'	58

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 creating a 5x3x12-ft deep excavation. Chloride field tests yielded concentrations similar to that of the background. Organic vapors were measured using a PID, which yielded low concentrations. The deepest sample, 12 ft bgs, was sent to a commercial laboratory for analysis of chloride and TPH, which yielded low concentrations. The excavated soil was returned to the excavation to ground surface and contoured to the surrounding area. On 8/19/2010, 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 Joe Gatts SIGNATURE not available COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Robert Egans INITIAL RE

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE Larry Bruce Baker Jr. DATE 2-26-11

EME Jct. H-14

Unit H, Sec. 14, T20S, R36E



Delineation trench being excavated

6/15/2010



Collecting Sample

6/15/2010



Seeding excavation

8/19/2010



Excavation complete

8/19/2010



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: 06/15/10
Reporting Date: 06/17/10
Project Number: NOT GIVEN
Project Name: EME JCT. H-14 (20/36)
Project Location: EME JCT. H-14 (20/36)

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

LAB NUMBER SAMPLE ID

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

ANALYSIS DATE	06/16/10	06/16/10	06/16/10
H20120-1 SOURCE @ 12'	<10.0	<10.0	32
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

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.

COPY

Chemist

06/21/10
Date

H20120 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.



101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603

(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

#26

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: 928547	EXPIRATION DATE: 2/04/2013
FILL DATE:	METER READING ACCURACY: 100.1

ACCURACY : +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	Jct. H-14	H	14	20	36

SAMPLE ID	PID	SAMPLE ID	PID
Background @ 6"	Ø		
Source @ 8'	Ø		
Source @ 9'	Ø		
Source @ 10'	Ø		
Source @ 11'	Ø		
Source @ 12'	Ø		

COPY

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

SIGNATURE:

Joe Gatto

DATE:

6/15/10

CHLORIDE CONCENTRATION CURVE

RICE Operating Company

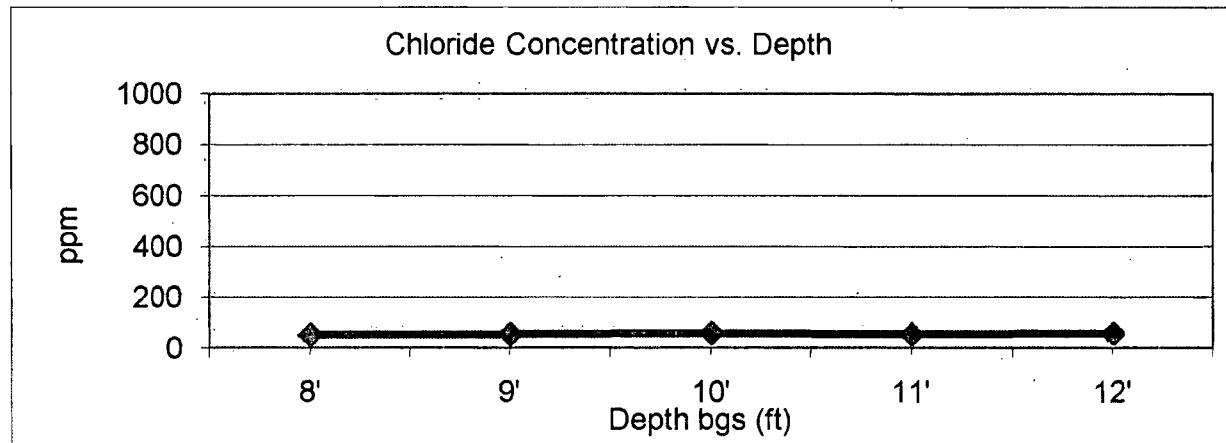
EME Jct. H-14

Unit 'H', Sec. 14, T20S, R36E

Backhoe samples at the junction (source)

Depth bgs (ft)	[Cl ⁻] ppm
8'	52
9'	54
10'	59
11'	55
12'	58

Groundwater = 20 ft





Current Photodocumentation

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

EME Jct. H-14
UL/H, Section 14, T20S, R36E



Facing south

2/5/2013



Facing northeast

2/5/2013