# 1R-427-32

# APPROVALS

YEAR(S):

#### Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD

**Sent:** Tuesday, March 12, 2013 11:12 AM **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 (1R427-321) Termination - ROC EME Jct N-13 Site

**RE:** Termination Request

for the Rice Operating Company's

**EME Jct N-13 Site** 

Unit Letter N, Section 13, T20S, R36E, NMPM, Lea County, New Mexico

Remediation Plan (1R427-321) 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 21, 2013 (received February 26, 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 (1R427-321) 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 CERTIFIED MAIL
RETURN RECEIPT NO. 7007 2560 0000 4569 8869

#### February 21, 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 Jct. N-13 (1R427-321): UL/N, 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 N-13 junction box. The site is located in UL/N, Sec. 13, T20S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 29 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x2x8 ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in low chloride concentrations. The 8 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 11/24/2010, 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.

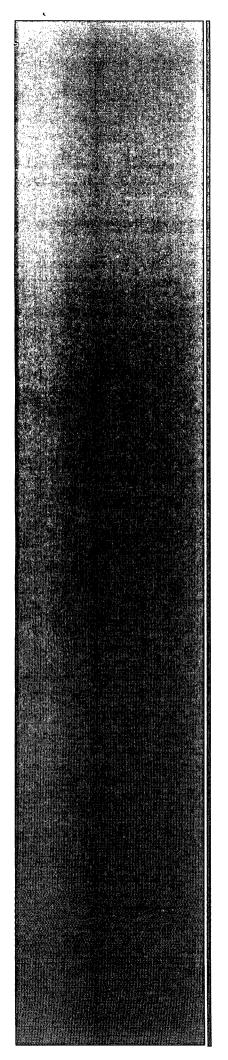
Sincerely,

**RICE Operating Company** 

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

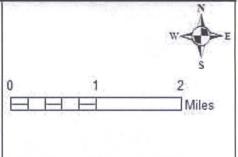
Site Location Map

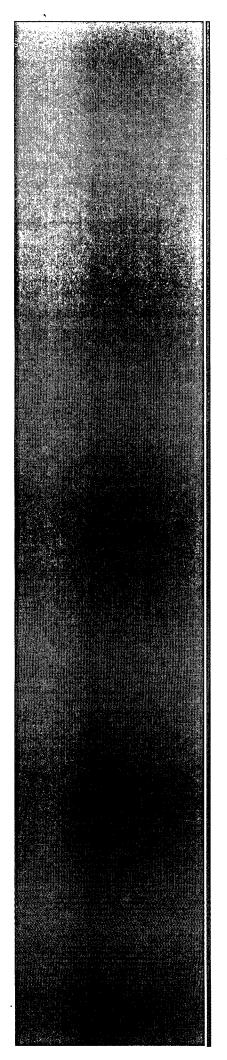
10	11	12	7	- 8	9	10	11	12
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	2	Foad	6.1	5	a		2	1
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21 22	23	t. N-13	19	20	2	22	22	24
28. 27	26 Tuff	Cooper Rd.	30	28	2.	27	26	25



EME Jct. N-13 (1R427-321)

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





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	COUNT		IMENSIONS -	FEET Depth
	Eunice-Monument- Eumont (EME)	Jct. N-13	N	13	208	36E	Lea	Length	Eliminated	Deptin
	LAND TYPE: E	BLM	STATE X	FEE LA	NDOWNER			OTHER		
Depth to Groundwater 29 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20										
	Date Started	11/24	/2010	Date Co	mpleted	11/24/201	<u> </u>	CD Witness	no	
	Soil Excavated	3.0	cubic yar	ds Exc	cavation Le	ength 5	v	Vidth 2	Depth	8 feet
	Soil Disposed	0	cubic yar	ds Of	fsite Facility		n/a	Location	n/a	<u> </u>
FINA	AL ANALYTI	CAL RE	SULTS:	Samp	le Date	11/24/20	010	Sample De	pth	8 ft.
				procedures	s pursuant to	NMOCD g	uidelines.		_	
	Sample Location	PID (fie		RO /kg	DRO mg/kg	Chloride mg/kg	₽	LOCATION	IDE FIELD T DEPTH	
so	URCE 8' GRAB			0.0	<10.0	16		background	6"	<u>ma/ka</u> 58
				<u> </u>					´4'	177
								vertical delineation	5'	85
Gene	ral Description	of Remedia	al Action:	This junction	box and line	were elimina	ted	trench at the	6'	114
during	the pipeline replac	ement/upgra	ade program.	After the for	rmer junction	box was		junction (source)	7'	90
remove	ed, an investigation	n was condu	cted using a	backhoe to c	ollect soil sar	nples at	<del></del>		8'	116
regular	intervals producin	ig a 5x2x8-ft-	-deep excava	tion: Chlorid	e field tests p	performed				<del></del>
on eac	h sample yielded l	ow concentra	ations similar	to that of the	background	I. Organic va	pors were	measured using a	PID, which al	so
yielded	low concentration	s. The deep	est sample,	8 ft. BGS wa	s sent to a co	ommercial lab	oratory fo	r analysis of chloric	de and TPH,	<u></u>
which o	confirmed low cond	entrations.	The excavate	ed soil was re	turned to the	excavation t	o ground s	urface and contou	red to the	
surrour	nding area. On 11	/24/2010, th	e site was se	eded with a t	olend of nativ	e vegetation	and is exp	ected to return to a	productive ca	apacity
at a no	rmal rate.				(					
						enclosures	: photos, l	ab results, PID (fie	ld) screenings	, chloride curv
	-									
	I HEREB	Y CERTIFY	THAT THE	INFORMA KNO		VE IS TRUE		MPLETE TO TH	IE BEST OF	MY
SITE S	UPERVISOR	Dak Harris	s SIG	NATURE	NAN H	WING.		COMPANY	RICE OPERA	TING COMPANY
	EPORT SEMBLED BY	Zach Cond	er	INITIAL	3,C					
PROJE	CT LEADERL	arry Bruce Bal	ker Jr. SIG	NATURE _ كُمّ	lary B	ruce Ba	her fr	DATE	2-15	- //
	,				J					

# EME Jct. N-13

Unit N, Section 13, T20S, R36E



Site prior to delineation

11/23/2010



Collecting sample

11/24/2010



Backfilling site

11/24/2010



Seeding site

11/24/2010



#### Analytical Results For:

Rice Operating Company Bruce Baker 112 W. Taylor Hobbs NM, 88240

Fax To:

(575) 397-1471

Received:

11/24/2010

Reported:

11/30/2010

Project Name:

EME JCT N-13 (20/36)

Project Number: Project Location: NONE GIVEN NOT GIVEN

Sampling Date:

11/24/2010

Sampling Type:

Soil

Sampling Condition:

Cool & Intact

Sample Received By:

Jodi Henson

#### Sample ID: SOURCE @ 8' (H021394-01)

Chloride, SM4500CI-B	mg/	kg	Analyze	d By: HM				****	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	. BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	11/30/2010	ND	416	104	400	3.77	
TPH 8015M	mg/	kg	Analyze	d By: AB					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	11/27/2010	ND	160	80.2	200	13.5	
DRO >C10-C28	<10.0	10.0	11/27/2010	ND	151	<b>75.</b> 7	200	0.359	
Surrogate: 1-Chlorooctane	103 9	% 70-130		atilis, directivitis, ups. a.e.a.a.a. 154 Africa appenyinglika Statistica	mp; *** villar 17 vil 14 v - 1404	Marki na rhar addinabjinajakan albikuqua ngustua w	va estados el tras qualitativa positivam basemonida		·
Surrogate: I-Chlorooctadecane	111 9	% 70-130							



Cardinal Laboratories

\*=Accredited Analyte

any other cause whatsoever shall be deemed waved unless made in writing and received by Cardinal within thirty (30) cays after completion of the applicable service. In no event shall cardinal be liable for incidental or consequential damages, including, without himborion, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, difficient or successors arising out of or related to the performance of the services necessarily by Cardinal, regardless of whether such

### CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

#### ARDINAL 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

Poblic   Project Manager:   Project Manager:   Poblic	Company Name: RICK Operating Company	BILL TO	ANALYSIS REQUEST
delines: 12.2 cs. Tay for the first state of the fi	Project Manager: Eruce Baker	P.O. #:	
Troject filmer: FNE ST N-13 (Do-Se) State: Zip: Phone #: State: Zip: Phone #: Post to const.    Apple Name: D-FK	Address: 122 W. Taylor	Company;	
Troject filmer: FNE ST N-13 (Do-Se) State: Zip: Phone #: State: Zip: Phone #: Post to const.    Apple Name: D-FK	City: 19665 State: MM Zip: 88240	Attn:	
Troject Hame: FME ST N=13 (Do-36)  State: Zip: Phone #: Pex #: Pe	Phone #: 575 -393-9/74 Fax#: 575-397-7471	Address:	
The second state of the se	Project #: Project Owner:	City:	
Sample I Nature: DAK I JARES MATRIX  FOR SAMPLING  Lab I.D. Sample I.D. I.D. Sample I.D. Sample I.D. Sample I.D. I.D. I.D. Sample I.D. I.D. I.D. I.D. I.D. I.D. I.D. I.D	Project Name: FME ST N=13 (Do-36)	State: Zlp:	
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Relinquished By:    Date:   Date:   Received By:	andyser. All dalas, including those for negligence and any other cause whicknever shall be decembed waterd unless made in writing cervice. In no even shall Cardinal be liable for inclination of consequental demages, including without limitation, business interruption	and received by Carenal within 36 days after completion o	t the applicable
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Sampler UPS - Bus - Other: Cool Intact (Interior See Office Offic	Delivered By: (Circle One) Sample Con	dillou CHECKED BY	(dig / 1 / 1 / 1
† Cardinal cannot accent verbal changes. Please fax written changes to 505-393 476		No   9	m <sup>2</sup> s 11 11 11



## RICE OPERATING COMPANY

122 West Taylor Hobbs, NM 88240 PHONE: (505) 393-9174 FAX: (505) 397-1471 PID METER CALIBRATION & FIELD REPORT FORM

CK.	V'	MODEL: PGM 7300	SERIAL NO: 590-000508
MODEL		MODEL: PGM 7300	SERIAL NO: 590-000504
NO.		MODEL: PGM 7320	SERIAL NO: 592-903318
		MODEL: PGM 7300	SERIAL NO: 590-000183

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 430133	EXPIRATION DATE: 4/88)	13
	METER READING ACCURACY: $100$	

ACCURACY: +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EHE	N-13	M	13	20	36

SAMPLE ID	PID	SAMPLE ID	PID
Background 66	8.2		
4'	8.2		
5'	1,6	RADW	
6'	1,7		
7	1.5		
8'	1.7		
	·		

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

SIGNATURE: 1 ) 6 1 7 1 1 1 1 1 1

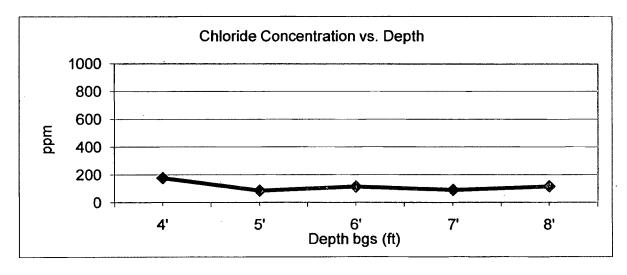
DATE: /1/24/10

# EME Jct. N-13

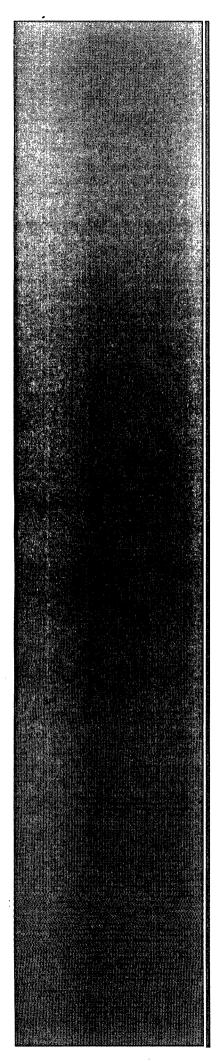
Unit 'N', Sec. 13, T20S, R36E

Backhoe samples at the junction (source)

Depth bgs (ft)	[Cl] ppm
4'	177
5'	85
6'	114
7'	90
8'	116



Groundwater = 29 ft



**Current Photodocumentation** 

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

# EME Jct. N-13

UL/N, Section 13, T20S, R36E



Facing south 2/13/2013



Facing east 2/13/2013