

1R - 427-330

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, March 12, 2013 4:47 PM
To: Hack Conder (hconder@riceswd.com)
Cc: Leking, Geoffrey R, EMNRD; Laura Pena (lpna@riceswd.com); Katie Jones <kjones@riceswd.com> (kjones@riceswd.com); Scott Curtis (scurtis@riceswd.com)
Subject: Remediation Plan (1R427-330) Termination - ROC EME Jct O-25 Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct O-25 Site
Unit Letter O, Section 25, T20S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-330) 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 (1R427-330) 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

RECEIVED OCD
ON 02-28 A 10:51
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 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. O-25 (1R427-330): UL/O, 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 O-25 junction box. The site is located in UL/O, 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 5x3x7 ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in low chloride concentrations. The 7 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 flourish at the end.

Hack Conder
Environmental Manager

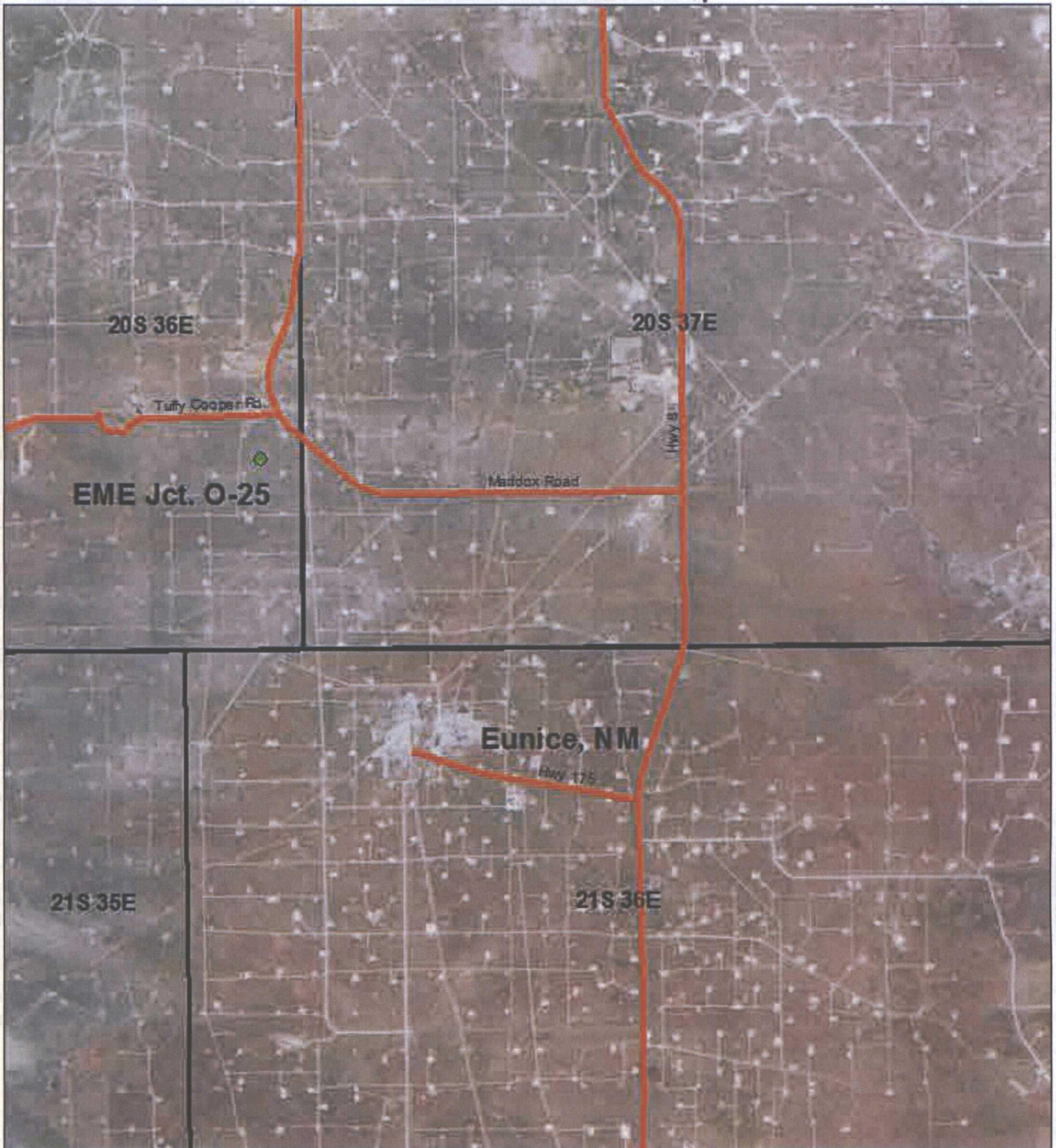
enclosures



Site Location Map

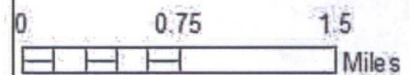
RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471

Site Location Map



EME Jct. O-25
(1R427-330)

LEGALS: UL/O, sec. 25,
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 LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Eunice-Monument-Eumont (EME)	Jct. O-25	O	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: 10

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

Soil Excavated 3.9 cubic yards Excavation Length 5 Width 3 Depth 7 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 4/13/2010 Sample Depth 7 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 7' GRAB	0.5	<10.0	<10.0	<16

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
background	6"	113
vertical delineation trench at the junction (source)	3'	154
	4'	151
	5'	149
	6'	141
	7'	148

General Description of Remedial Action: This junction box 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 5x3x7-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 and also yielded low concentrations. The deepest sample, 7 ft. BGS was analyzed by a commercial laboratory 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

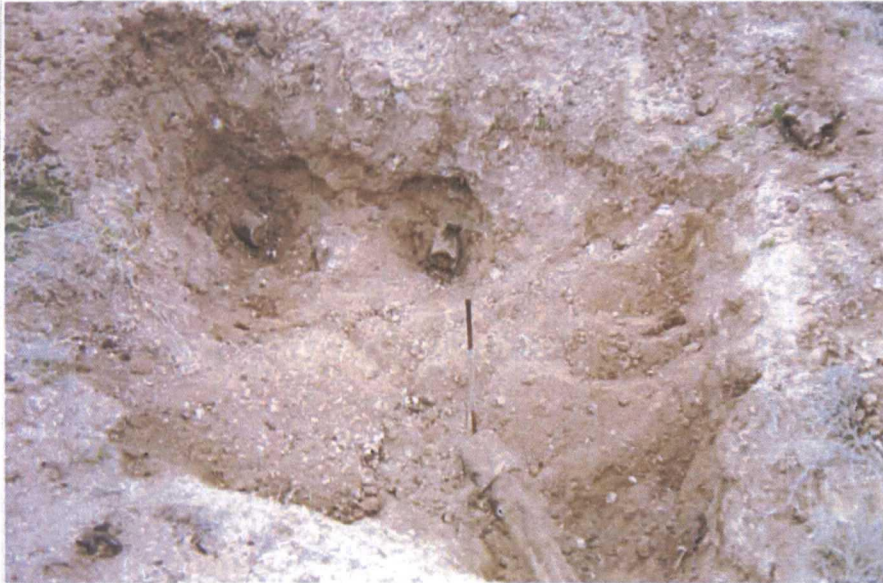
SITE SUPERVISOR Jordan Woodfin SIGNATURE  COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Larry Bruce Baker Jr. INITIAL LBB

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

EME Jct. O-25

Unit O, Section 25, T20S, R36E



Site prior to excavation

4/1/2010



Collecting a soil sample

4/13/2010



Final excavation 5x3x7 4/13/2010



Seeding site 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: BD JCT 0-25 (20/36)
Project Location: BD JCT 0-25 (20/36)

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

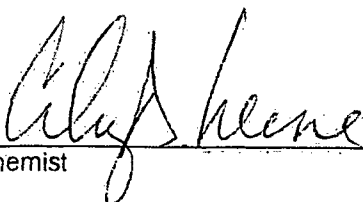
LAB NUMBER	SAMPLE ID	GRO	DRO	CI*
		(C ₆ -C ₁₀) (mg/kg)	(>C ₁₀ -C ₂₈) (mg/kg)	CI* (mg/kg)

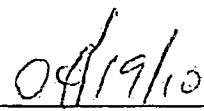
ANALYSIS DATE		04/15/10	04/15/10	04/14/10
H19667-1	SOURCE BTM GRAB @ 7FT	<10.0	<10.0	< 16
Quality Control		485	564	500
True Value QC		500	500	500
% Recovery		97.0	113	100
Relative Percent Difference		0.1	0.4	<0.1

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.


Chemist


Date

H19667 TCL RICE

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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

Company Name: Rice Operating Company				BILL TO				ANALYSIS REQUEST																	
Project Manager: Bruce Baker				P.O. #:				<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">Chlorides</div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">TPH 8015 M</div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">BTEX</div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">Texas TPH</div> </div>																	
Address: 122 West Taylor				Company:																					
City: Hobbs State: NM Zip: 88240				Attn:																					
Phone #: 575-393-9174 Fax #: 575-397-1471				Address:																					
Project #: Project Owner:				City:																					
Project Name: EME JCT 0-25 10 30				State: Zip:				<div style="text-align: center; font-size: 2em; opacity: 0.5;">COPY</div>																	
Project Location: EME JCT 0-25 20 30				Phone #:																					
Sampler Name: Jordan Woodfin				Fax #:																					
LAB USE ONLY																									
Lab I.D.		Sample I.D.		GIRAB OR (C)OMP.		# CONTAINERS		MATRIX		PRESERV.		SAMPLING													
								GROUNDWATER WASTEWATER SOIL OIL SLUDGE OTHER:		ACID/BASE: ICE / COOL OTHER:		DATE TIME													
H91601-1		Source lab's grb@ JH		1		1		✓		✓		4-15-10 10:00 AM		✓											

SE 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 the client for the service. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 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.

Relinquished By: Jordan Woodfin		Date: 4-14-10 Time:		Received By:		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #:	
						Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Fax #:	
Delivered By: (Circle One) Sampler - UPS - Bus - Other:		Date: 4-13-10 Time: 4:05		Received By: Jodi Benson		REMARKS: email results jwoodfin@riceswd.com; jpurvis@riceswd.com bbaker@riceswd.com	
				Sample Condition Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
				CHECKED BY: JH			

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

#26

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:

✓

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 7600 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	0-25	0	25	205	360

SAMPLE ID	PID	SAMPLE ID	PID
Source		Background	
3'	0.8	6"	0.2
4'	0.7		
5'	0.9		
6'	0.7		
7'	0.5		

COPY

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

SIGNATURE

Jordan Wood

DATE:

7-13-10

CHLORIDE CONCENTRATION CURVE

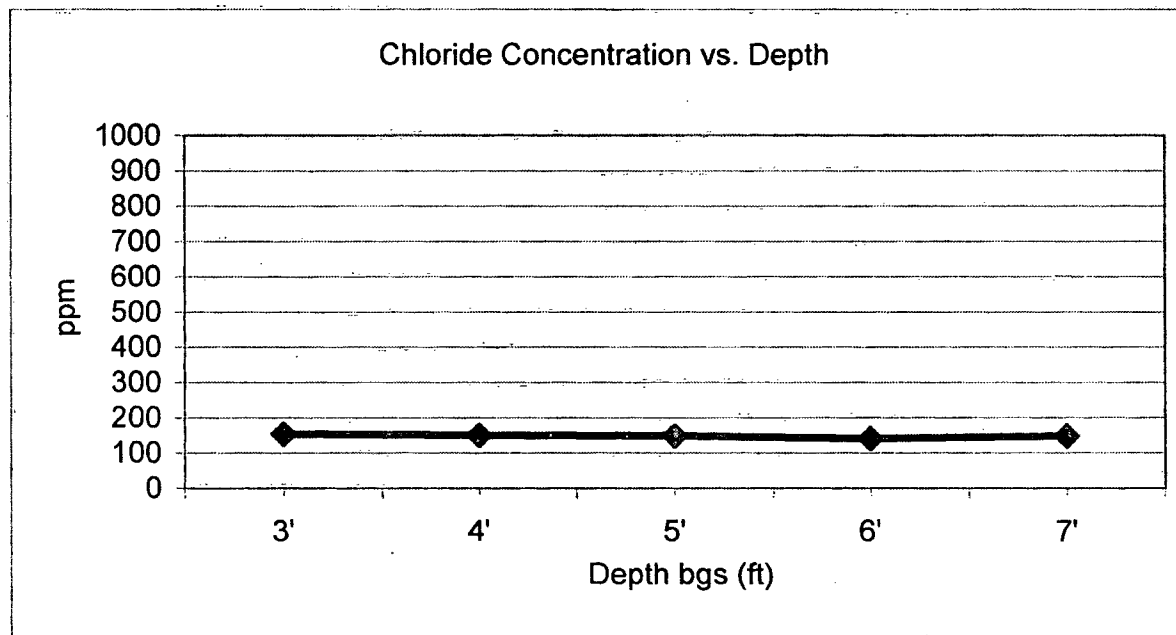
RICE Operating Company

EME Jct. O-25

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

Backhoe samples at the junction (source)

Depth bgs. (ft)	[Cl ⁻] ppm
3'	154
4'	151
5'	149
6'	141
7'	148



Groundwater = 106 ft.



Current Photodocumentation

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

EME Jct. O-25
UL/O, Section 25, T20S, R36E



Facing northeast

2/8/2013



Facing south

2/8/2013