

1R - 427-309

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, March 26, 2013 12:44 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 (1R427-309) Termination - ROC EME Jct D-15 Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct D-15 Site
Unit Letter D, Section 15, T21S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-309) 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 March 8, 2013 (received March 13, 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 (1R427-309) 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 9279

RECEIVED

March 8, 2013

MAR 13 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. D-15 (1R427-309): UL/D, Sec. 15, T21S, 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 2009, ROC initiated work on the former D-15 junction box. The site is located in UL/D, Sec. 15, T21S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 195 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 35x25x12 ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in chloride concentrations that decreased with depth. The excavated soil was blended on site and representative composite samples were collected from the excavation walls, bottom and blended backfill, resulting in a 4-wall chloride concentration of 160 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The bottom sample resulted in a chloride concentration of 352 mg/kg, a GRO concentration below detectable limits and a DRO concentration of 39.9 mg/kg. The blended backfill sample resulted in a chloride concentration of 96 mg/kg, a GRO concentration below detectable limits and a DRO concentration of 21.9 mg/kg. The blended backfill was returned to the excavation to ground surface and contoured to the surrounding area. On 2/25/2009, 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. Vegetation

will also provide a natural infiltration barrier for the site since plants capture water through their roots thereby reducing the volume of water moving through the vadose zone to groundwater.

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.

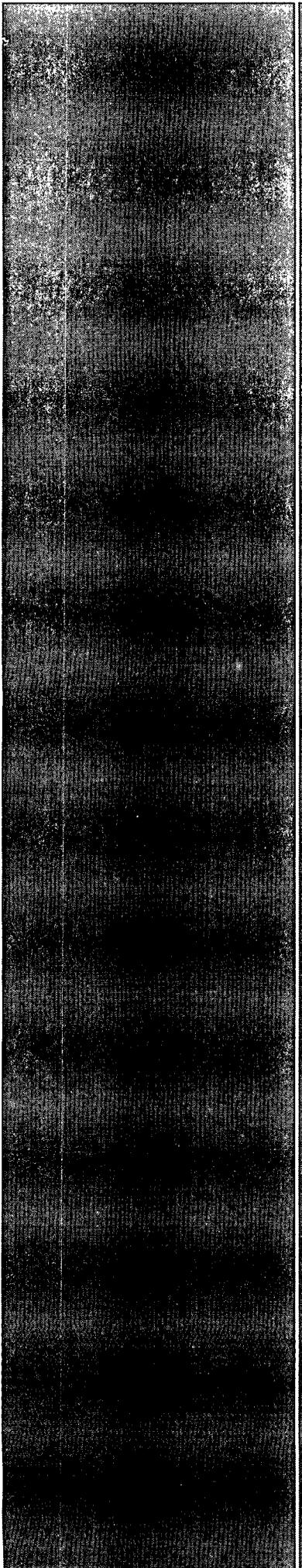
Sincerely,
RICE Operating Company



Hack Conder
Environmental Manager

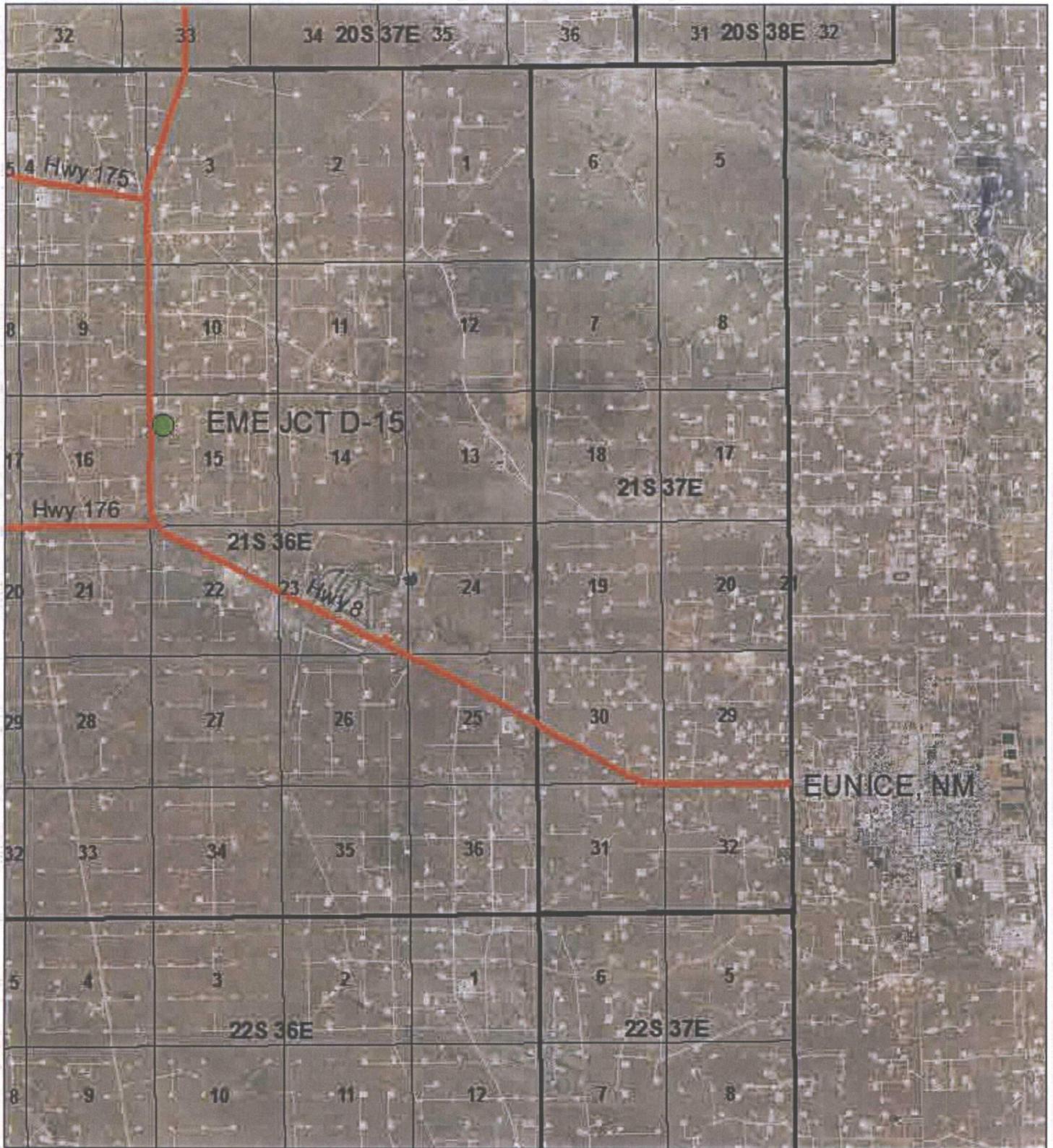
enclosures

RECEIVED OGD
2013 MAR 13 P 2:27



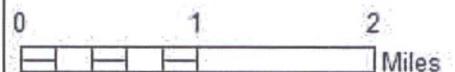
Site Location Map

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

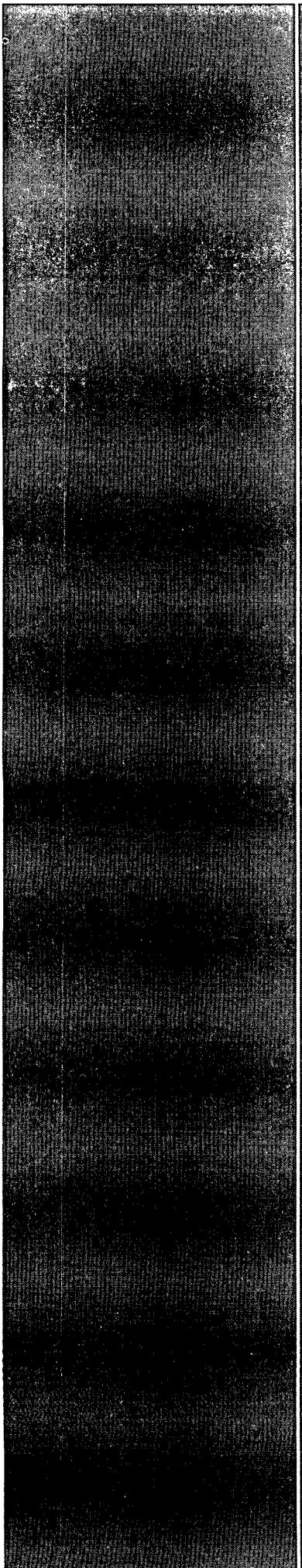


EME JCT D-15

UL D SECTION 15
T-21-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		
							Length	Width	Depth
Eunice Monument Eumont (EME)	Jct. D-15	D	15	21S	36E	Lea	eliminated		

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

Depth to Groundwater 195 feet NMOCD SITE ASSESSMENT RANKING SCORE: *20

Date Started 1/13/2009 Date Completed 2/25/2009 OCD Witness no

Soil Excavated 389 cubic yards Excavation Length 35 Width 25 Depth 12 feet

Soil Disposed 96 cubic yards Offsite Facility Sundance Location Eunice, NM

FINAL ANALYTICAL RESULTS: Sample Date 2/17/2009 Sample Depth 12 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.

CHLORIDE FIELD TESTS

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
4-WALL COMP.	2.8	<10.0	<10.0	160
BOTTOM COMP.	0.2	<10.0	39.9	352
BLENDED BACKFILL	4.4	<10.0	21.9	96

LOCATION	DEPTH	mg/kg
4-wall comp.	n/a	240
bottom comp.	12'	420
blended backfill	n/a	150
background	6"	90
vertical delineation trench at 15 ft North of the junction (source)	1'	264
	2'	348
	3'	335
	4'	420
	5'	461
	6'	397
	7'	224
	8'	506
	9'	586
	10'	511
	11'	365
12'	336	

General Description of Remedial Action: This junction was 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 35x25x12-ft-deep excavation. Chloride field tests were performed on each sample, which yielded generally low concentrations. Organic vapors were measured using a PID, which also yielded low concentrations. The excavated soil was blended on site with clean, imported soil. Representative composite samples were collected from the excavation walls, bottom, and blended excavated soil. Laboratory analysis of the representative samples confirmed low concentrations. The blended excavated soil was returned to the excavation to ground surface and contoured to the surrounding area. On 2/25/2009, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

*A windmill is located 580 ft west of the site.

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 Eric Garrison SIGNATURE [Signature] COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Katie Jones INITIAL KJ

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE [Signature] DATE 5-13-09

EME Jct. D-15

Unit D, Section 15, T21S, R36E



site prior to excavation, facing north

1/13/2009



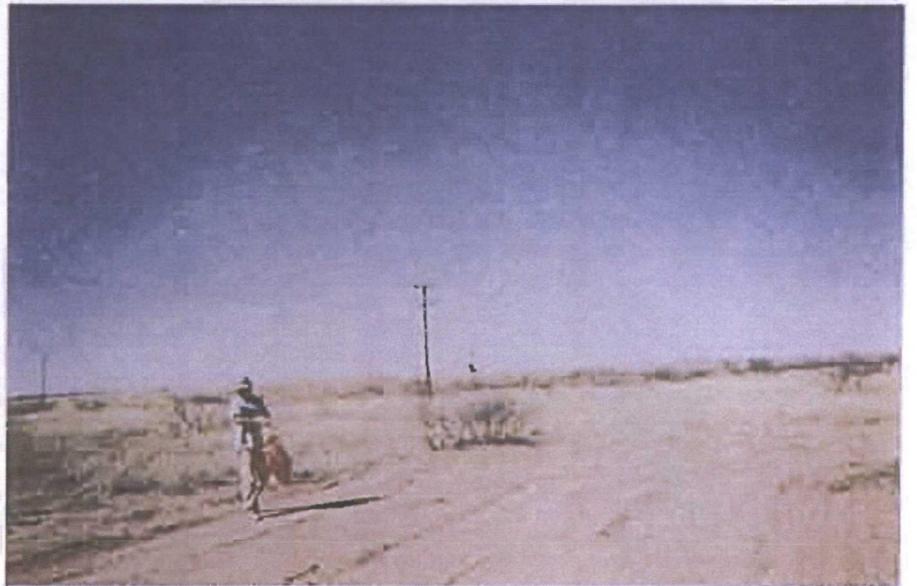
collecting a soil sample, facing east

1/19/2009



final 35x25x12-ft excavation, facing west

2/24/2009



seeding backfilled site, facing north

2/25/2009



CARDINAL LABORATORIES

13742 E. Colorado Street, Denver, Colorado 80231
303-751-3320 Fax 303-751-3943

Page #

Project Name: Rice Operating		BILL TO:		ANALYSIS REQUEST																																																									
Client: Eric Garrison		Company:		<div style="position: absolute; top: 20px; left: 20px; font-size: 2em; opacity: 0.5;">COPY</div>																																																									
Address: 122 W Taylor		Address:																																																											
City: Rocky		City:																																																											
State: NM. Zip: 88240		State Zip:																																																											
Phone: 393-9174		Phone:																																																											
Project Owner:		Project:																																																											
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Sample Description: EME 05 D-15		Preserv:																																																											
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Company: **J. Garrison** Date: **2-17-09** Received by: **Mindy LeDuff**
 Name: **J. Garrison** Date: **4-35** Received by: **Mindy LeDuff**

Phone: FAX: REMARKS: FAXED:

Results
B Baker @ Rice.swd.com
J Purvis @ Rice.swd.com
 * See called and #3 sample name needs to be "South" ch

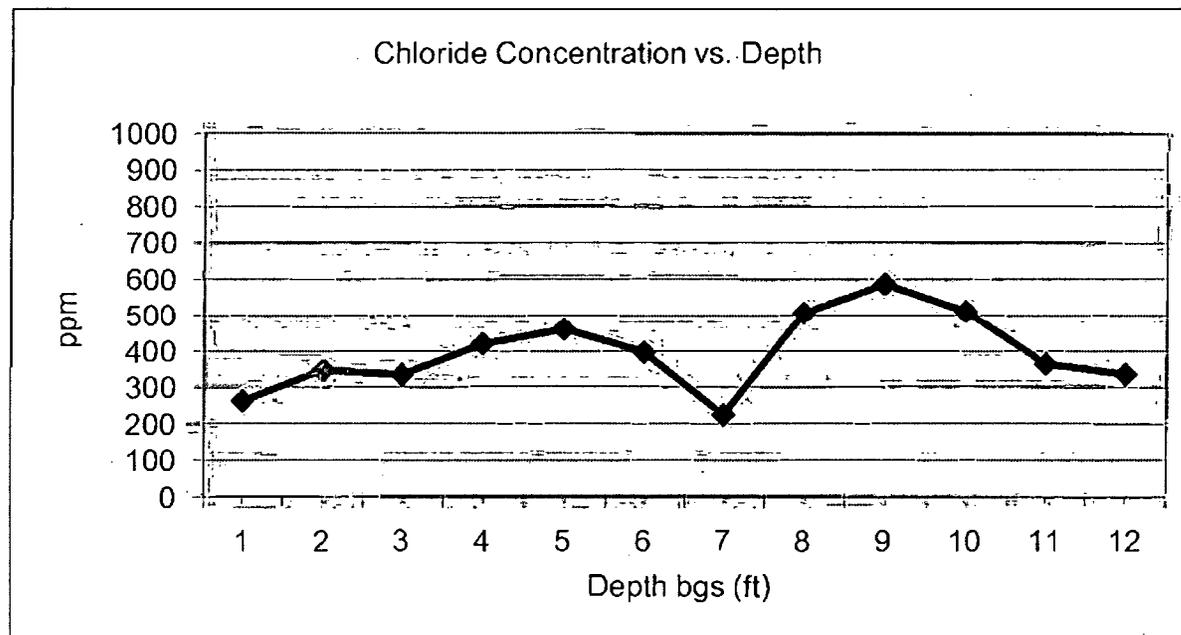
Sample Condition: **NOGS** Analyzed by: **MCAB**
 Date: **4-35** No. **1212** No. **10**

EME Jct. D-15

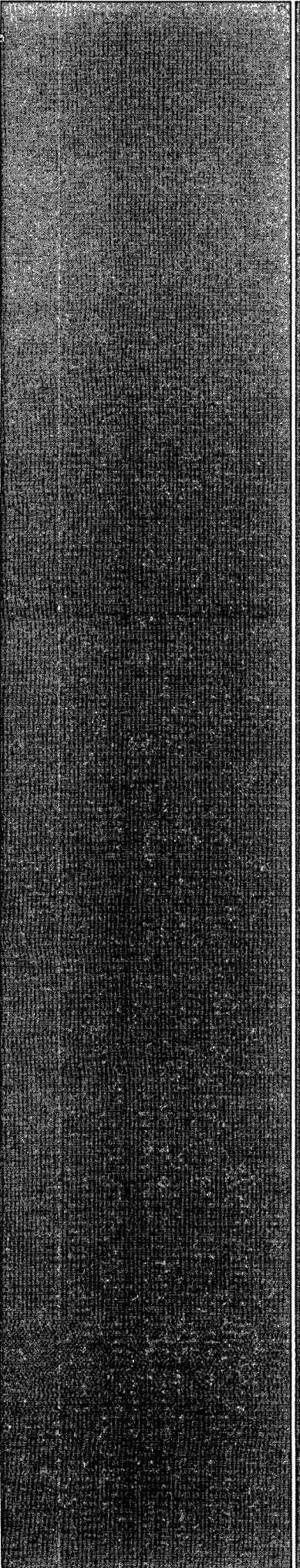
Unit 'D', Sec. 15, T21S, R36E

Backhoe samples at 15 ft North of the junction (source)

Depth bgs (ft)	[Cl] ppm
1	264
2	348
3	335
4	420
5	461
6	397
7	224
8	506
9	586
10	511
11	365
12	336



Groundwater = 195 ft



Current Photodocumentation

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

EME Jct. D-15
UL/D, Section 15, T21S, R36E



Facing west

2/22/2013



Facing north

2/22/2013