

1R - 427-109

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, April 02, 2013 4:24 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 (1R427-109) Termination - ROC EME F-29 Site

**RE: Termination Request
for the Rice Operating Company's
EME F-29 Site
Unit Letter F, Section 29, T19S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-109) 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 21, 2013 (received March 27, 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 (1R427-109) 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 9309

RECEIVED

MAR 27 2013

March 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

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

RE: Termination Request
EME F-29 (1R427-109): UL/F, Sec. 29, T19S, R37E
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 2001, ROC initiated work on the former F-29 junction box. The site is located in UL/F, Sec. 29, T19S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 17 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 20x8x7 ft deep excavation. Each sample was field titrated for chlorides, resulting in chloride concentrations that related with depth. Representative samples were collected from the excavation walls and excavation bottom and sent to a commercial laboratory for analysis. The sidewall sample resulted in a chloride concentration of 304 mg/kg and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The sample was also analyzed for BTEX, resulting in concentrations of benzene, toluene, and ethyl benzene below detectable limits and 0.024 mg/kg for total xylenes. The bottom composite sample resulted in a chloride concentration of 126 mg/kg and concentrations of GRO and DRO below detectable limits. The sample was also analyzed for BTEX, resulting in concentrations of benzene, toluene and total xylenes below detectable limits and 0.005 mg/kg for ethyl benzene. A compacted clay liner was installed and the excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area. The liner would provide a barrier that will inhibit the downward

migration of chlorides to groundwater. Since the site is located next to a lease road, seeding is not required. A new, watertight junction was installed at the site.

The junction box site location map, final report, laboratory analysis 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

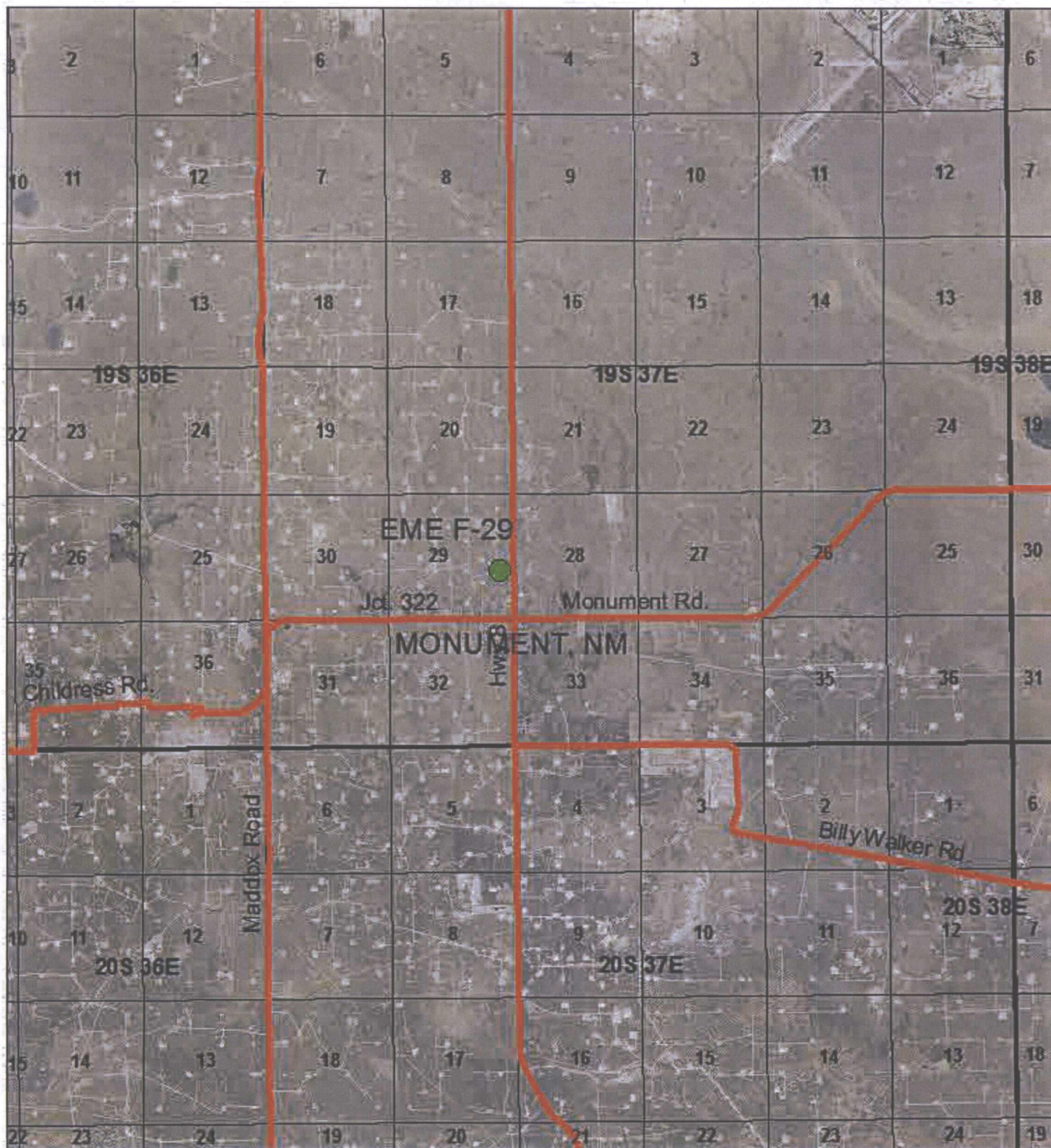
enclosures

RECEIVED OGD
2013 MAR 27 P 2:17



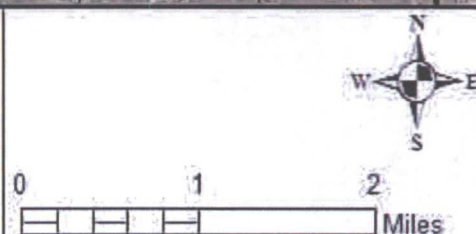
Site Location Map

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



EME F-29 (1R427-109)

Unit Letter F, Section 29
T19S, R37E
Lea County, NM



Drawing date: 3/19/13
Drafted by: Traci Jennings

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		
EME	F-29	F	29	19S	37E	LEA	Length 10	Width 8	Depth 4

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

Depth to Groundwater 17 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 03/01/2001 Date Completed 03/01/2001 OCD Witness NO

Soil Excavated 41 cubic yards Excavation Length 20 Width 8 Depth 7 feet

Soil Disposed 0 cubic yards Offsite Facility _____ Location _____

FINAL ANALYTICAL RESULTS: Sample Date 03/01/2001 Sample Depth 7'

Procure 5-point composite sample of bottom and 4-point composite sample of sidewalls. TPH, BTEX and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines.

Sample Location	Benzene mg/kg	Toluene mg/kg	Ethyl Benzene mg/kg	Total Xylenes mg/kg	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SIDEWALLS	<0.005	<0.005	<0.005	0.024	<50	<50	304
BOTTOM	<0.005	<0.005	0.005	<0.015	<50	<50	126

General Description of Remedial Action: Delineated lateral and vertical extent.

The wall sample was 346 ppm chlorides. Another 2' of wall was removed and resampled at 304 ppm chlorides. These results indicate a decline in chlorides. Installed a compacted clay barrier and water tight junction box and backfilled with blended top soil.

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS	2'	210
BOTTOM	6'	380
BOTTOM	7'	190

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

DATE March 1, 2001 PRINTED NAME Chris Rodriguez

SIGNATURE Chris Rodriguez TITLE Environmental Technician



ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2328 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
RICE OPERATING CO.
ATTN: JAMES STURGILL
122 W. TAYLOR
HOBBS, NM 88240
FAX TO:

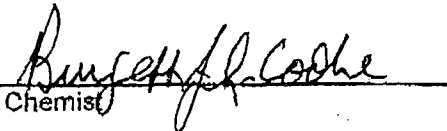
Receiving Date: 03/02/01
Reporting Date: 03/05/01
Project Number: F-29-1&2
Project Name: F29-1&2
Project Location: U-29 SEC29-T19-R37

Sampling Date: 03/02/01
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC/AH

LAB NO.	SAMPLE ID	GRO	DRO	CI*
		(C ₆ -C ₁₀) (mg/Kg)	(>C ₁₀ -C ₂₈) (mg/Kg)	(mg/Kg)
ANALYSIS DATE		03/02/01	03/02/01	03/05/01
H5667-1	F-29-1-2 SIDES	<50	<50	346
H5667-2	F-29-1-2 BOTTOM	<50	<50	126
Quality Control		732	744	992
True Value QC		800	800	1000
% Recovery		91.6	93.0	99.2
Relative Percent Difference		8.2	2.1	3.9

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI: Std. Methods 4500-CIB

*Analyses performed on 1:4 w:v aqueous extracts.


Chemist

3/5/01
Date

H5667A.XLS
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ANALYTICAL RESULTS FOR
RICE OPERATING CO.
ATTN: JAMES STURGILL
122 W. TAYLOR
HOBBS, NM 88240
FAX TO:

Receiving Date: 03/02/01
Reporting Date: 03/05/01
Project Number: F-29-1&2
Project Name: F29-1&2
Project Location: U-29 SEC29-T19-R37

Sampling Date: 03/02/01
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC

LAB NO.	SAMPLE ID	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE		03/02/01	03/02/01	03/02/01	03/02/01
H5667-1	F-29-1-2 SIDES	<0.005	0.005	0.005	<0.015
H5667-2	F-29-1-2 BOTTOM	<0.005	<0.005	0.005	<0.015
Quality Control		0.112	0.107	0.110	0.323
True Value QC		0.100	0.100	0.100	0.300
% Recovery		112	107	110	108
Relative Percent Difference		2.8	2.0	3.5	5.8

METHOD: EPA SW-846 8260

Burgess R. Cooke
Chemist

3/5/01
Date

H5667B.XLS
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Page ____ of ____

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



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ANALYTICAL RESULTS FOR
RICE OPERATING CO.
ATTN: CHRIS RODRIQUEZ
122 W. TAYLOR
HOBBS, NM 88240
FAX TO:

Receiving Date: 03/26/01
Reporting Date: 03/28/01
Project Number: NOT GIVEN
Project Name: JCT F-29-1
Project Location: E.M.E. SEC 29 T19S R37E

Sampling Date: 03/26/01
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (>C ₁₀ -C ₂₈) (mg/Kg)	Cl* (mg/Kg)
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ANALYSIS DATE	03/27/01	03/27/01	03/27/01
H5737-1** WALL COMPOSITE	<50	<50	304
Quality Control	716	801	980
True Value QC	800	800	1000
% Recovery	89.5	100	98.0
Relative Percent Difference	1.7	1.9	1.0

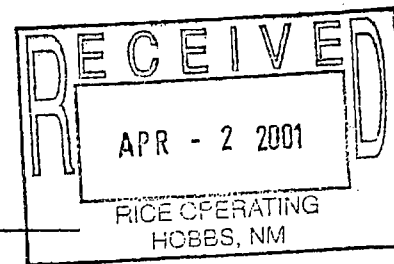
METHODS: TPH GRO & DRO: EPA SW-846 8015 M; Cl: Std. Methods 4500-ClB

*Analysis performed on a 1:4 w:v aqueous extract.

** Analysis of sample 2 (Bottom) cancelled verbally on 03/27/01.

Chemist

Date



H5737A.XLS
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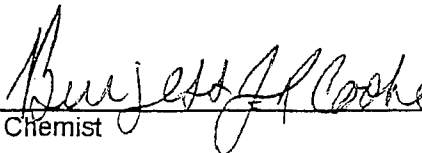
ANALYTICAL RESULTS FOR
RICE OPERATING CO.
ATTN: CHRIS RODRIQUEZ
122 W. TAYLOR
HOBBS, NM 88240
FAX TO:

Receiving Date: 03/26/01
Reporting Date: 03/28/01
Project Number: NOT GIVEN
Project Name: JCT F-29-1
Project Location: E.M.E. SEC 29 T19S R37E

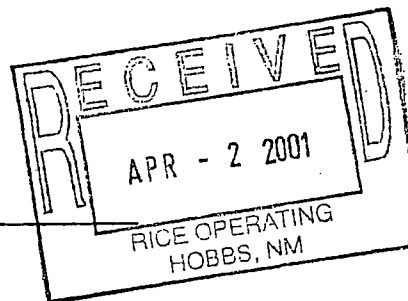
Sampling Date: 03/26/01
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

LAB NO.	SAMPLE ID	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE		03/26/01	03/26/01	03/26/01	03/26/01
H5737-1	WALL COMPOSITE	<0.005	<0.005	<0.005	0.024
H5737-2	BOTTOM	<0.005	0.010	0.021	0.114
Quality Control		0.108	0.105	0.106	0.317
True Value QC		0.100	0.100	0.100	0.300
% Recovery		108	105	106	106
Relative Percent Difference		2.2	0.9	2.7	2.4

METHOD: EPA SW-846 8260


Chemist

3/28/01
Date



H5737B.XLS

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PLAINTIFFS' MOTION: Liability and Damages. Cardinal's liability and third's exclusion remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the third for the services. 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 interruption, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services provided by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Terms and Conditions: Interest will be charged on all accounts more than 30 days past due at the rate of 3% per annum from the original date of invoice, and all kinds of collections, including attorney's fees.

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Current Photodocumentation

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

EME F-29

UL/F, Section 29, T19S, R37E



Facing north

3/13/2013



Facing south

3/13/2013