

1R - 427-83

**APPROVALS**

**YEAR(S):**

2013

**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Thursday, May 09, 2013 12:52 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 (1R427-83) Termination - ROC EME L-19-2 Site

**RE: Termination Request  
for the Rice Operating Company's  
EME L-19-2 Site  
Unit Letter L, Section 19, T20S, R37E, NMPM, Lea County, New Mexico  
Remediation Plan (1R427-83) 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 April 22, 2013 (received April 24, 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 (1R427-83) 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 9354

RECEIVED

April 22, 2013

APR -24 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 L-19-2 (1R427-83): UL/L, Sec. 19, T20S, 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 2002, ROC initiated work on the former L-19-2 junction box. The site is located in UL/L, Sec. 19, T20S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 37 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 15x25x8 ft deep excavation. Each sample was field titrated for chlorides, resulting in low chloride concentrations. Representative samples were collected from the excavation sidewalls and bottom and sent to a commercial laboratory for analysis. The sidewalls sample resulted in a chloride concentration of 18 mg/kg and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The bottom composite sample resulted in a chloride concentration of 26 mg/kg and GRO and DRO concentrations below detectable limits. Both samples were analyzed for BTEX, resulting in concentrations below detectable limits throughout with the exception of the sidewalls total xylenes concentration of 0.33 mg/kg. An additional vertical was excavated to 14 ft deep. The sample at 14 ft was collected and sent to a commercial laboratory for analysis, resulting in a chloride concentration of 186 mg/kg and concentrations of GRO and DRO below detectable limits. The sample was also analyzed for BTEX, resulting in benzene,

toluene and total xylenes concentrations below detectable limits and 0.053 mg/kg for ethyl benzene.

A total of 36 cubic yards of excavated soil was properly disposed of at a NMOCD facility. A compacted clay layer was installed and will provide a barrier that will inhibit the downward migration of chlorides to groundwater. The excavation was backfilled with blended soil and a new, watertight junction was installed over the site. The site is located next to a lease road; therefore, seeding is not required.

The junction box site location map, final report, laboratory analysis, disposal manifest 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.

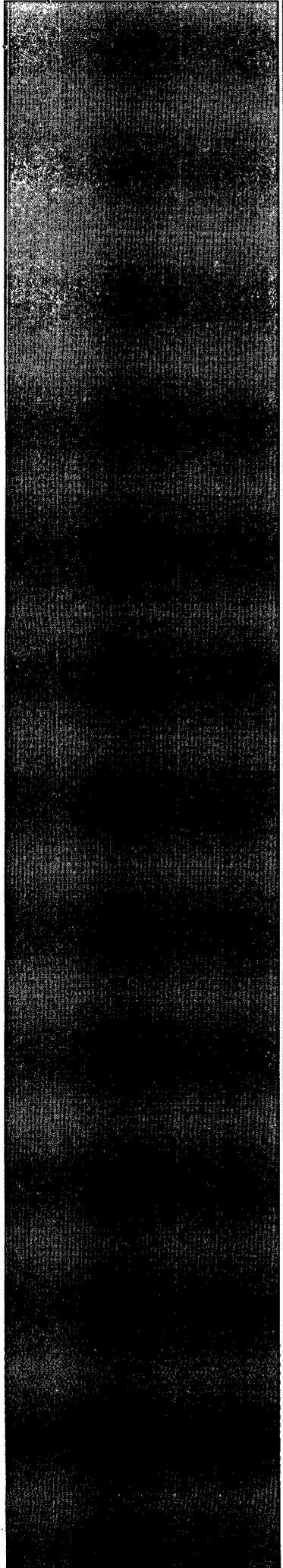
Sincerely,  
RICE Operating Company



Hack Conder  
Environmental Manager

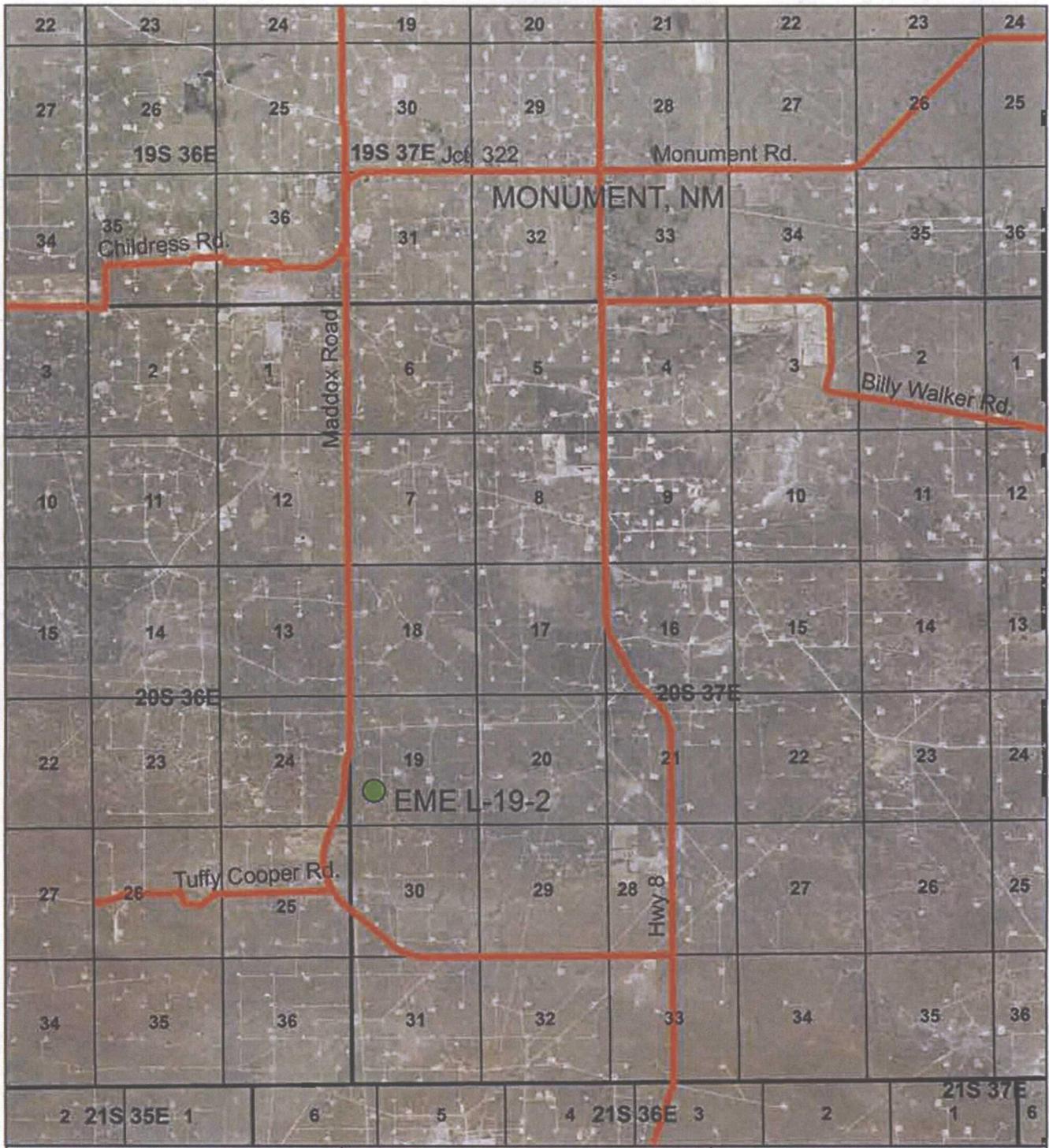
enclosures

RECEIVED OGD  
2013 APR 24 P 2:24



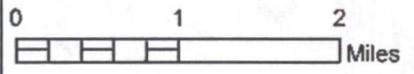
# Site Location Map

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

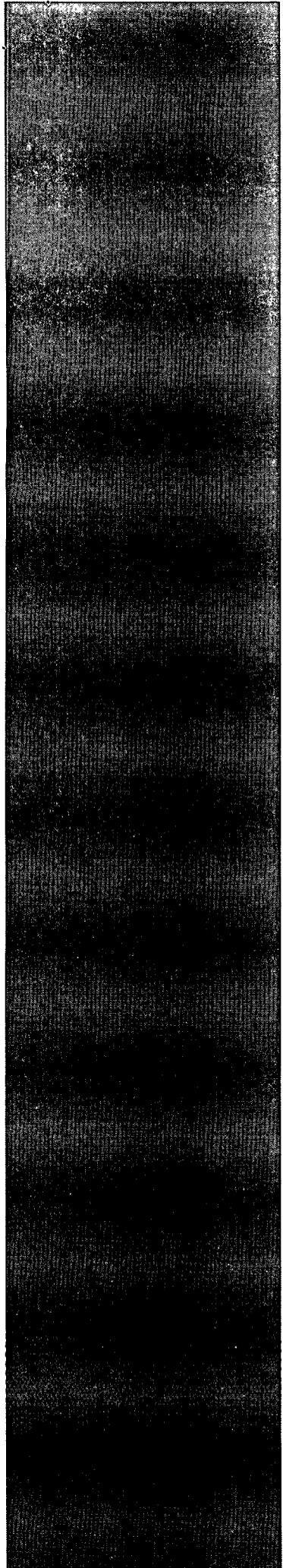


**EME L-19-2  
(1R427-83)**

**Unit Letter L, Section 19  
T20S, R37E  
Lea County, NM**



Drawing date: 3/21/13  
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		
							Length	Width	Depth
EME	L-19-2	L	19	20S	37E	LEA	12	10	5

LAND TYPE: BLM \_\_\_\_\_ STATE X FEE LANDOWNER \_\_\_\_\_ OTHER \_\_\_\_\_

Depth to Groundwater 37 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 02/27/2002 Date Completed 02/28/2002 OCD Witness NO

Soil Excavated 80 cubic yards Excavation Length 15 Width 25 Depth 8 feet

Soil Disposed 36 cubic yards Offsite Facility SOUTH MONUMENT Location MONUMENT, NM

**FINAL ANALYTICAL RESULTS:** Sample Date 02/27/2002 Sample Depth 8'

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	<0.025	<0.025	<0.025	0.033	<10	<10	18
BOTTOM	<0.025	<0.025	<0.025	<0.025	<10	<10	26
Vertical @ 14'	<0.025	<0.025	0.053	<0.025	<10	<10	186

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

**CHLORIDE FIELD TESTS**

Found impact below NMOCD guidelines. Installed a compact clay barrier and water tight junction box. High impact soil was hauled to a permitted disposal facility. Backfilled with blended soil.

LOCATION	DEPTH	mg/kg
SIDEWALLS	7'	50
BOTTOM	8'	50
Vertical trench	6'	250
	10'	100
	14'	200

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

DATE March 20, 2002 PRINTED NAME D. E. Anderson  
SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

# ANALYTICAL REPORT

## Prepared for:

Derek Robinson  
RE Environmental  
P.O. Box 13418  
Odessa, TX 79764

Project: Rice L-19-2  
Order#: G0202690  
Report Date: 03/05/2002

### Certificates

US EPA Laboratory Code TX00158

# ENVIRONMENTAL LAB OF TEXAS

## SAMPLE WORK LIST

RE Environmental  
P.O. Box 13418  
Odessa, TX 79764  
366-0804

Order#: G0202690  
Project:  
Project Name: Rice  
Location: L-19-2

The samples listed below were submitted to Environmental Lab of Texas and were received under chain of custody. Environmental Lab of Texas makes no representation or certification as to the method of sample collection, sample identification, or transportation/handling procedures used prior to the receipt of samples by Environmental Lab of Texas.

<u>Lab ID:</u>	<u>Sample :</u>	<u>Matrix:</u>	<u>Date / Time</u> <u>Collected</u>	<u>Date / Time</u> <u>Received</u>	<u>Container</u>	<u>Preservative</u>
0202690-01	TPV @ 14'	SOIL	02/27/2002 10:00	02/27/2002 16:30	4 oz glass	Ice
	<u>Lab Testing:</u>	Rejected: No		Temp: 3.5 C		
	8015M TPH GRO/DRO					
	8021B/5030 BTEX					
	Chloride					
0202690-02	4 pt. Comp. Wall @ 7'	SOIL	02/27/2002 11:00	02/27/2002 16:30	4 oz glass	Ice
	<u>Lab Testing:</u>	Rejected: No		Temp: 3.5 C		
	8015M TPH GRO/DRO					
	8021B/5030 BTEX					
	Chloride					
0202690-03	5 pt. Comp. Bottom @ 8'	SOIL	02/27/2002 15:00	02/27/2002 16:30	4 oz glass	Ice
	<u>Lab Testing:</u>	Rejected: No		Temp: 3.5 C		
	8015M TPH GRO/DRO					
	8021B/5030 BTEX					
	Chloride					

# ENVIRONMENTAL LAB OF TEXAS

## ANALYTICAL REPORT

Derek Robinson  
RE Environmental  
P.O. Box 13418  
Odessa, TX 79764

Order#: G0202690  
Project:  
Project Name: Rice  
Location: L-19-2

Lab ID: 0202690-01  
Sample ID: TPV @ 14'

### 8015M TPH GRO/DRO

<u>Method</u>	<u>Date</u>	<u>Date</u>	<u>Sample</u>	<u>Dilution</u>	<u>Analyst</u>	<u>Method</u>
<u>Blank</u>	<u>Prepared</u>	<u>Analyzed</u>	<u>Amount</u>	<u>Factor</u>		
0000723-02		2/28/02 13:59	1	1	CK	8015

Parameter	Result mg/kg	RL
GRO, C6-C12	<10.0	10.0
DRO, >C12-C28	<10.0	10.0

### 8021B/5030 BTEX

<u>Method</u>	<u>Date</u>	<u>Date</u>	<u>Sample</u>	<u>Dilution</u>	<u>Analyst</u>	<u>Method</u>
<u>Blank</u>	<u>Prepared</u>	<u>Analyzed</u>	<u>Amount</u>	<u>Factor</u>		
0000718-02		2/28/02 13:16	1	25	CK	8021B

Parameter	Result µg/kg	RL
Benzene	< 25.0	25.0
Ethylbenzene	52.7	25.0
Toluene	< 25.0	25.0
p/m-Xylene	< 25.0	25.0
o-Xylene	< 25.0	25.0

Lab ID: 0202690-02  
Sample ID: 4 pt. Comp. Wall @ 7'

### 8015M TPH GRO/DRO

<u>Method</u>	<u>Date</u>	<u>Date</u>	<u>Sample</u>	<u>Dilution</u>	<u>Analyst</u>	<u>Method</u>
<u>Blank</u>	<u>Prepared</u>	<u>Analyzed</u>	<u>Amount</u>	<u>Factor</u>		
0000723-02		2/28/02 14:09	1	1	CK	8015

Parameter	Result mg/kg	RL
GRO, C6-C12	<10.0	10.0
DRO, >C12-C28	<10.0	10.0

# ENVIRONMENTAL LAB OF TEXAS

## ANALYTICAL REPORT

Derek Robinson  
 RE Environmental  
 P.O. Box 13418  
 Odessa, TX 79764

Order#: G0202690  
 Project:  
 Project Name: Rice  
 Location: L-19-2

Lab ID: 0202690-02  
 Sample ID: 4 pt. Comp. Wall @ 7'

### 8021B/5030 BTEX

<u>Method</u>	<u>Date</u>	<u>Date</u>	<u>Sample</u>	<u>Dilution</u>	<u>Analyst</u>	<u>Method</u>
Blank	Prepared	Analyzed	Amount	Factor		
0000718-02		2/28/02 13:37	1	25	CK	8021B

Parameter	Result µg/kg	RL
Benzene	< 25.0	25.0
Ethylbenzene	< 25.0	25.0
Toluene	< 25.0	25.0
p/m-Xylene	33.4	25.0
o-Xylene	< 25.0	25.0

Lab ID: 0202690-03  
 Sample ID: 5 pt. Comp. Bottom @ 8'

### 8015M TPH GRO/DRO

<u>Method</u>	<u>Date</u>	<u>Date</u>	<u>Sample</u>	<u>Dilution</u>	<u>Analyst</u>	<u>Method</u>
Blank	Prepared	Analyzed	Amount	Factor		
0000723-02		2/28/02 14:47	1	1	CK	8015

Parameter	Result mg/kg	RL
GRO, C6-C12	<10.0	10.0
DRO, >C12-C28	<10.0	10.0

# ENVIRONMENTAL LAB OF TEXAS

## ANALYTICAL REPORT

Derek Robinson  
 RE Environmental  
 P.O. Box 13418  
 Odessa, TX 79764

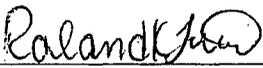
Order#: G0202690  
 Project:  
 Project Name: Rice  
 Location: L-19-2

Lab ID: 0202690-03  
 Sample ID: 5 pt. Comp. Bottom @ 8'

### 8021B/5030 BTEX

<u>Method</u>	<u>Date</u>	<u>Date</u>	<u>Sample</u>	<u>Dilution</u>	<u>Analyst</u>	<u>Method</u>
Blank	Prepared	Analyzed	Amount	Factor		
0000718-02		2/28/02 13:58	1	25	CK	8021B

Parameter	Result µg/kg	RL
Benzene	< 25.0	25.0
Ethylbenzene	< 25.0	25.0
Toluene	< 25.0	25.0
p/m-Xylene	<25.0	25.0
o-Xylene	< 25.0	25.0

Approval:  3-05-02  
 Raland K. Tuttle, Lab Director, QA Officer  
 Celey D. Keene, Org. Tech. Director  
 Jeanne McMurrey, Inorg. Tech. Director  
 Irene Perry, QA Assistant  
 Sandra Biezugbe, Lab Tech.  
 Curt Cowdrey, Lab Tech.  
 Sara Molina, Lab Tech.

# ENVIRONMENTAL LAB OF TEXAS

## ANALYTICAL REPORT

Derek Robinson  
RE Environmental  
P.O. Box 13418  
Odessa, TX 79764

Order#: G0202690  
Project:  
Project Name: Rice  
Location: L-19-2

Lab ID: 0202690-01  
Sample ID: TPV @ 14'

### Test Parameters

<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Dilution Factor</u>	<u>RL</u>	<u>Method</u>	<u>Date Analyzed</u>	<u>Analyst</u>
Chloride	186	mg/kg	1	10	9253	03/04/2002	SB

Lab ID: 0202690-02  
Sample ID: 4 pt. Comp. Wall @ 7'

### Test Parameters

<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Dilution Factor</u>	<u>RL</u>	<u>Method</u>	<u>Date Analyzed</u>	<u>Analyst</u>
Chloride	18.0	mg/kg	1	10	9253	03/04/2002	SB

Lab ID: 0202690-03  
Sample ID: 5 pt. Comp. Bottom @ 8'

### Test Parameters

<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Dilution Factor</u>	<u>RL</u>	<u>Method</u>	<u>Date Analyzed</u>	<u>Analyst</u>
Chloride	26.0	mg/kg	1	10	9253	03/04/2002	SB

Approval:

*Raland K Tuttle*  
Raland K. Tuttle, Lab Director, QA Officer  
Celey D. Keene, Org. Tech. Director  
Jeanne McMurrey, Inorg. Tech. Director  
Irene Perry, QA Assistant  
Sandra Biezugbe, Lab Tech.  
Curt Cowdrey, Lab Tech.  
Sara Molina, Lab Tech.

*3-05-02*  
Date

# ENVIRONMENTAL LAB OF TEXAS

## QUALITY CONTROL REPORT

8015M TPH GRO/DRO

Order#: G0202690

<b>BLANK</b>	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
GRO, C6-C12-mg/kg	0000723-02			<10.0		
DRO, >C12-C28-mg/kg	0000723-02			<10.0		
<b>MS</b>	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
GRO, C6-C12-mg/kg	0202690-03	0	476	478	100.4%	
DRO, >C12-C28-mg/kg	0202690-03	0	476	492	103.4%	
<b>MSD</b>	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
GRO, C6-C12-mg/kg	0202690-03	478	476	502	105.5%	4.9%
DRO, >C12-C28-mg/kg	0202690-03	492	476	520	109.2%	5.5%
<b>SRM</b>	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
GRO, C6-C12-mg/kg	0000723-05		500	549	109.8%	0.0%
DRO, >C12-C28-mg/kg	0000723-05		500	515	103.0%	0.0%

# ENVIRONMENTAL LAB OF TEXAS

## QUALITY CONTROL REPORT

8021B/5030 BTEX

Order#: G0202690

<b>BLANK</b>	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene- $\mu\text{g}/\text{kg}$	0000718-02			<25.0		
Ethylbenzene- $\mu\text{g}/\text{kg}$	0000718-02			<25.0		
Toluene- $\mu\text{g}/\text{kg}$	0000718-02			<25.0		
p/m-Xylene- $\mu\text{g}/\text{kg}$	0000718-02			<25.0		
o-Xylene- $\mu\text{g}/\text{kg}$	0000718-02			<25.0		
<b>MS</b>	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene- $\mu\text{g}/\text{kg}$	0202690-03	0	2500	2430	97.2%	
Ethylbenzene- $\mu\text{g}/\text{kg}$	0202690-03	0	2500	2570	102.8%	
Toluene- $\mu\text{g}/\text{kg}$	0202690-03	0	2500	2440	97.6%	
p/m-Xylene- $\mu\text{g}/\text{kg}$	0202690-03	0	5000	5300	106.6%	
o-Xylene- $\mu\text{g}/\text{kg}$	0202690-03	0	2500	2600	104.0%	
<b>MSD</b>	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene- $\mu\text{g}/\text{kg}$	0202690-03	0	2500	2770	110.8%	13.1%
Ethylbenzene- $\mu\text{g}/\text{kg}$	0202690-03	0	2500	2960	118.4%	14.1%
Toluene- $\mu\text{g}/\text{kg}$	0202690-03	0	2500	2790	111.6%	13.4%
p/m-Xylene- $\mu\text{g}/\text{kg}$	0202690-03	0	5000	6050	121.0%	13.2%
o-Xylene- $\mu\text{g}/\text{kg}$	0202690-03	0	2500	3020	120.8%	14.9%
<b>SRM</b>	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene- $\mu\text{g}/\text{kg}$	0000718-05		100	111	111.0%	0.0%
Ethylbenzene- $\mu\text{g}/\text{kg}$	0000718-05		100	108	108.0%	0.0%
Toluene- $\mu\text{g}/\text{kg}$	0000718-05		100	108	108.0%	0.0%
p/m-Xylene- $\mu\text{g}/\text{kg}$	0000718-05		200	221	110.5%	0.0%
o-Xylene- $\mu\text{g}/\text{kg}$	0000718-05		100	107	107.0%	0.0%

# ENVIRONMENTAL LAB OF TEXAS

## QUALITY CONTROL REPORT

### Test Parameters

Order#: G0202690

<i><b>BLANK</b></i>	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg	0000764-01			<5.00		
<i><b>CONTROL</b></i>	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg	0000764-02		5000	5052	101.0%	
<i><b>MS</b></i>	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg	0202690-02	18	500	523	101.0%	
<i><b>MSD</b></i>	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg	0202690-02	18	500	523	101.0%	0.0%



**SOUTH MONUMENT SURFACE WASTE FACILITY**

TICKET# 5381

**LEASE OPERATOR:**  
RICE OPERATING  
122 WEST TAYLOR  
HOBBS, NM 88240  
ATTN: DONNIE ANDERSON

**ORIGINATING LOCATION:**  
JCT. L-19-2  
S19T20S R37E

**TRANSPORTER NAME & ADDRESS:**  
R E ENVIRONMENTAL SERVICES  
P.O. BOX 13418  
ODESSA, TX 79768

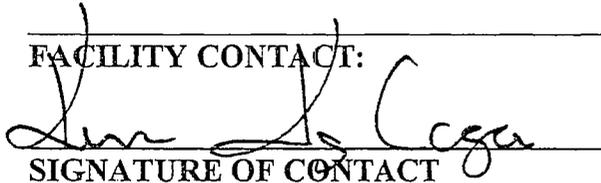
**DESCRIPTION OF WASTE:**

**QUANTITY:**

NON-HAZARDOUS HYDROCARBONS

36 YDS.

**FACILITY CONTACT:**

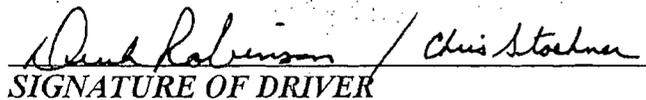
  
SIGNATURE OF CONTACT

2/28/02  
DATE

CELL NUMBER MATERIAL PLACED IN:

B-1

**SIGNATURE OF TRANSPORTER (DRIVER):**

  
SIGNATURE OF DRIVER

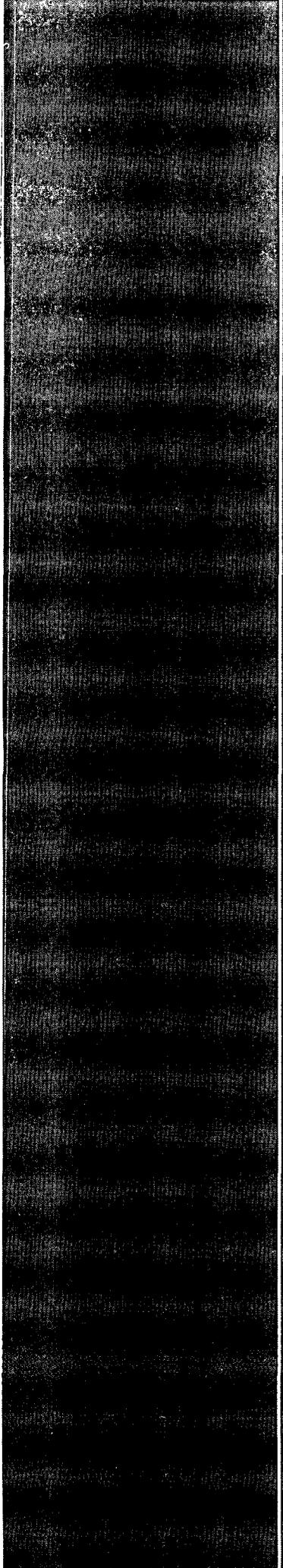
2-28-02  
DATE

**DISPOSAL SITE**  
SOUTH MONUMENT SURFACE WASTE FACILITY  
P.O. BOX 418  
HOBBS, NM 88241-0418  
S25 T20S R36E N/2 NE/4

"As a condition of acceptance for disposal, I hereby certify that this waste is an exempt waste as defined by the Environmental Protection Agency (EPA). The waste are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C Regulations; and not mixed with non-exempt waste."

  
FACILITY REPRESENTATIVE

2/28/02  
DATE



# Current Photodocumentation

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

# EME L-19-2 (1R427-83)

UL/L, Section 19, T20S, R37E



Facing west

3/20/2013



Facing north

3/20/2013