1R-427-73

APPROVALS

YEAR(S):

Hansen, Edward J., EMNRD

From:

Hansen, Edward J., EMNRD

Sent:

Monday, May 13, 2013 11:32 AM

To:

Hack Conder (hconder@riceswd.com)

Cc:

Leking, Geoffrey R, EMNRD; Laura Pena (Ipena@riceswd.com); Katie Jones

<kjones@riceswd.com> (kjones@riceswd.com); Scott Curtis (scurtis@riceswd.com)

Subject:

Remediation Plan (1R427-73) Termination - ROC EME B-18 Site

RE: Termination Request

for the Rice Operating Company's

EME B-18 Site

Unit Letter B, Section 18, T19S, R37E, NMPM, Lea County, New Mexico

Remediation Plan (1R427-73) 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 (1R427-73) 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 9316

April 22, 2013

APR 2 4 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 B-18 (1R427-73): UL/B, Sec. 18, 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 2002, ROC initiated work on the former B-18 junction box. The site is located in UL/B, Sec. 18, T19S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 64 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 22x20x7 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 154 mg/kg, a gasoline range organics (GRO) concentration below detectable limits and a diesel range organics (DRO) concentration of 155 mg/kg. The bottom composite sample resulted in a chloride concentration of 222 mg/kg, a GRO concentration below detectable limits and a DRO concentration of 106 mg/kg. Both samples were analyzed for BTEX, resulting in below detectable limits throughout. The total 110 cubic yards of excavated soil was properly disposed of at a NMOCD facility. A new, watertight junction was installed over the site, which is located next to a lease road; therefore, seeding is not required

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.

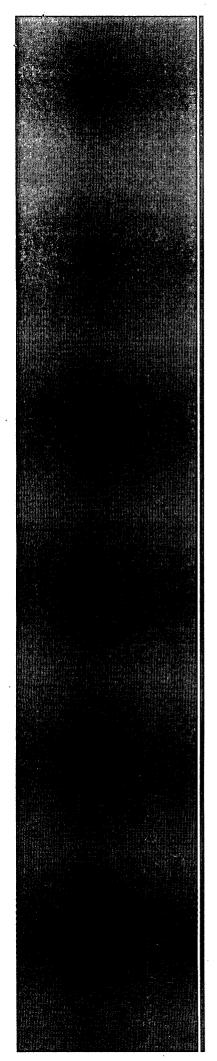
Sincerely,

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

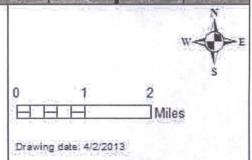
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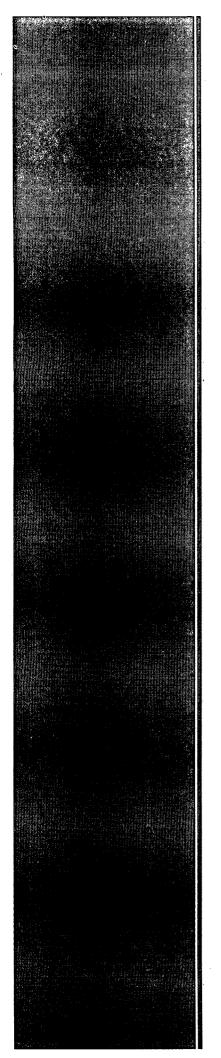


EME B-18

Unit Letter B, Section 18, T19S, R37E Lea County, NM

NMOCD Case #: 1R427-73



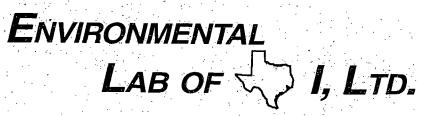


Junction Box Report

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

EME B-18 B 18 19S 37E LEA LEA Legib Width Despit De		T			BOX LOC					
EME B-18 B 18 18 18S 37E LEA 8 8 5 LAND TYPE: BLM STATE FEE LANDOWNER JIMME T.COOPER OTHER Depth to Groundwater 64 feet NMCCD SITE ASSESSMENT RANKING SCORE: 10 Date Started 02/07/2002 Date Completed 02/08/2002 OCD Writness NO Soil Excavated 110 cubic yards Excavation Length 22 Width 20 Depth 7 feet Soil Disposed 110 cubic yards Offsite Facility CSC LANDFARM Location MONUMENT, NM FINAL ANALYTICAL RESULTS: Sample Date 02/08/2002 Sample Depth 7 Procure 6-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 NMCCD guidelines. Sample Benze Benz Benz	SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY			
Depth to Groundwater 64 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10 Date Started 02/07/2002 Date Completed 02/08/2002 OCD Witness NO Soil Excavated 110 cubic yards Excavation Length 22 Width 20 Depth 7 feet Soil Disposed 110 cubic yards Offsite Facility C8C LANDFARM Location MONUMENT, NM FINAL ANALYTICAL RESULTS: Sample Date 02/08/2002 Sample Depth 7 Procure 6-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 Benzane Toluene Ethyl Benzene Toluene mgkg mgkg mgkg mgkg mgkg mgkg mgkg mgk	EME	B-18	В	18	195	37E	LEA	1	1	1 1
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Location mg/kg mg/	•		hloride lab	oratory tes procedure	st results com s pursuant to	npleted by us NMOCD gu	ing an appr idelines.			
SIDEWALLS		1			- 1					I .
General Description of Remedial Action: Delineated vertical and lateral extent to below NMOCD guidelines. Installed compacted clay barrier to vertical transmissivity and a water tight junction box. Backfilled with clean topsoil. Natural attenuation will remediate the remaining hydrocarbon. I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF. DATE February 19, 2002 PRINTED NAME D. E. Anderson										
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DATE February 19, 2002 PRINTED NAME D. E. Anderson								BOTTOM	7'	200
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SIGNATURE TITLE Project Leader - Environmental	DATE	/February	, 19, 2002		PF	RINTED NAME		D. E	E. Anderson	
	SIGNATURE	Ma	edus	7~		TITLE	P	roject Lea	der - Environi	mental



"Don't Treat Your Soil Like Dirt!"

RE ENVIRONMENTAL ATTN: LOGAN ANDERSON

P.O. BOX 13418 ODESSA, TEXAS 79768-3418

FAX: 366-0804

FAX: 505-397-1471 (Donnie Anderson)

Sample Type: Soil

Project Location: B-18

Sample Condition: Intact/ Iced/ 4.0 deg C/ * 10 deg C

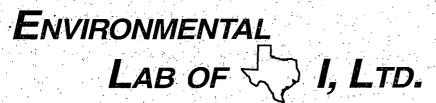
Project Name: Rice Operating Project #: None Given Sampling Date: See Below Receiving Date: 02/08/02 Receiving Date: * 02/11/02 Anaylsis Date: 02/11/02

ELT# FIELD CODE	BENZENE	TOLUENE E	THYLBENZENE	m,p-XYLENE	o-XYLENE	SAMPLE
	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	DATE
0202560-01 5 pt Bottom Comp.	<0.025	<0.025	<0.025	<0.025	<0.025	02/07/02
0202568-01* 4 pt Wall Comp. @ 6'	<0.025	<0.025	<0.025	<0.025	<0.025	02/08/02

	. •				
QUALITY CONTROL	0.109	0.111	0.103	0.218	0.099
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% INSTRUMENT ACCURACY	109	111	103	109	99
SPIKED AMOUNT	0.100	0.100	0,100	0.200	0.100
ORIGINAL SAMPLE	< 0.025	<0.025	<0.025	<0.025	<0.025
SPIKE	0.115	0.114	0.108	0.227	0.099
SPIKE DUP	0.112	0.115	0.108	0.230	0.102
% EXTRACTION ACCURACY	112	. 115	108	115	102
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025
RPD	2.64	0.87	0.00	1.31	2.98

METHODS: EPA SW 846-8021B ;5030

Celey D. Keene Raland K. Tuttle Date



"Don't Treat Your Soil Like Dirt!"

RE ENVIRONMENTAL ATTN: LOGAN ANDERSON

P.O. BOX 13418

ODESSA, TEXAS 79768-3418

FAX: 366-0804

FAX: 505-397-1471 (Donnie Anderson)

Sample Type: Soil

Sample Condition: Intact/ Iced/ 4.0 deg C/ * 10 deg C

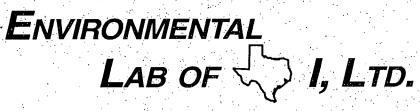
Project Name: Rice Operating Project #: None Given Project Location: B-18 Sampling Date: See Below Receiving Date: 02/08/02 Receiving Date: *02/11/02 Analysis Date: 02/11/02

		GRO DRO C6-C10 >C10-C28	SAMPLE	
ELT#	FIELD CODE	mg/kg mg/kg	DATE	· · · · · · · · · · · · · · · · · · ·
0202560-01 0202568-01*	5 pt Bottom Comp. 4 pt Wall Comp. @ 6'	<10 102 <10 155	02/07/02 02/08/02	

QUALITY CONTROL	561	592
TRUE VALUE	500	500
% INSTRUMENT ACCURACY	110	117
SPIKED AMOUNT	476	476
ORIGINAL SAMPLE	<10	84
SPIKÉ	529	578
SPIKE DUP	596	645
% EXTRACTION ACCURACY	111	104
BLANK	<10	<10
RPD	11.9	11.0

Methods: SW 846-8015M

Celey D. Keene Raland K. Tuttle Veene 02/13/02



"Don't Treat Your Soil Like Dirt!"

RE ENVIRONMENTAL ATTN: LOGAN ANDERSON

P.O. BOX 13418

ODESSA, TEXAS 79768-3418

FAX: 366-0804

FAX: 505-397-1471 (Donnie Anderson)

Sample Type: Soil

Sample Condition: Intact/ Iced/ 4.0 deg C/ * 10 deg C

Project Name: Rice Operating Project #: None Given

Project #: None Given Project Location: B-18

Sampling Date: See Below, Receiving Date: 02/08/02 Receiving Date: *02/11/02 Analysis Date: 02/11/02

ELT#	FIELD CODE		Chloride mg/kg	SAMPLE DATE	
0202560-01 0202568-01*	5 pt Bottom Comp. 4 pt Wall Comp. @ 6'		222 154	02/07/02 02/08/02	

QUALITY CONTROL		5050
TRUE VALUE		5000
% INSTRUMENT ACCURACY		101
SPIKED AMOUNT		625
ORIĞINAL SAMPLE		,222
SPIKE	i de la companya de	853
SPIKE DUP		853
% EXTRACTION ACCURACY		101
BLANK		<5.00
RPD		0.0

Methods: SW 846-9253

Celey D. Keene Raland K. Tutti

Environmental L 12600 West I-20 East Odessa, Texas 79763	Phone: 915-563-1800									CHAI	N OF	CUSTO	DDY R	ECOF	RD A	ND ANA	JVere	PEOU	EST		
Project Manager: Loc	gan Anderson	-																			
Company Name $\mathcal{L}\mathcal{U}$	Environment		 -					·			Pro	ect N	ame: _		<u>(ic</u>	e Op	era	ting			
Company Address:						· ·						Proje	ect #: _						<u> </u>		
City/State/Zip:								 ,		•	Р	roject	Loc: _		3-/	18					
									 .			F	°O #: _								
Telephone No: Sampler Signature:	M		Fax No:																		
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	•												TO		T	nalyze F	or:	TT	77	\dashv	
				_[Prese	rvative			Matri	<u> </u>	T-	TOT	Še	+	 					
LAB # (lab use only)		Date Sampled	Time Sampled	No. of Containers	lce 't		Nach H.SO ₄ Mone	Other (Specify)	ler	Soil	Other (specify):	TDS (CD) SAR / EC 1PH 418 1	TPI-1 TX 1005/1006	TPH 8015M GRO/DRO Metals: As Ag Ba Cd Cr Pb Hg	Volatiles	Semivolatiles BTEX 80218/5030				RUSH TAT (Pre-Schedule)	Standard TAT
0202560-01 5ph Both	FIELD CODE	2-7-02			8 <u>≤</u> ∤ .	오	\$ \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	ğ	Water	Soil	ŧ		++		Vola	Sem				RUSH	Stand
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Date

2-08-02 /630

Time

Date

Time

Environmental Lab of Texas, Inc. Phone: 915-563-1800 12600 West I-20 East CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST Odessa, Texas 79763 Fax: 915-563-1713 Project Manager: Company Name Company Address: City/State/Zip: Telephone No: Sampler Signature: Analyze For: TCLP: TOTAL Preservative Matrix RUSH TAT (Pre-Schedule TPH 8015M GRO/DRO TDS /CD SAR / EC TPH TX 1005/1006 As Ag Ba (Other (Specify) Standard TAT Sludge H.SO Soil LAB # (lab use only) 2-8-02 10202568-01 Special Instructions: Sample Containers Intact? Temperature Upon Receipt: Laboratory Comments:

Relinquished by:

Relinquished by:

Date

2-11-02

Date

Time

8100 An

Received by:

Received by ELCT

pee. 10°C

Date

2-11-02

Time

0810

C & C LANDFARM, INC.

BOX 55

MONUMENT, NEW MEXICO 88265 PHONE: (505) 397-2045

(505) 397-2045 (505) 397-2860 (505) 392-2236

001819

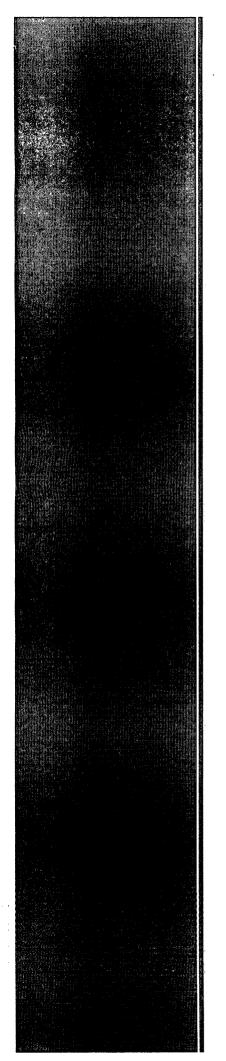
·	
COMPANYNAME Rive Operating =	<u>o</u>
COMPANY REPRESENTATIVE NAME	e ned
LEASENAME B-18	· · · · · · · · · · · · · · · · · · ·
SEC. TOWNSHIP RANGE	
TRUCKING COMPANY NAME A Emma.	
DRIVERS SIGNATURE & Comments	**-
TYPEOFMATERIAL BEING HAULED AND QUANTITY //2)	fd_
COPYOFANALYSIS ATTACHED, IFREQUIRED 700 /	123
TPHC ender 10,000 gra	
BENZENE /	
TOLUENE	• .
ETHYL BENZENE	
PARA XYLENE	
ATTENDANT ON DUTY TO THE TOTAL TO SERVER	
DATE 2 8 - 00 Z	
. 02-97-5	pt500-bk25-#1701

EME B-18 Jct. Box Upgrade



Remediation





Current Photodocumentation

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

EME B-18 (1R427-73) UL/B, Section 18, T19S, R37E



Facing east 3/22/2013



Facing west 3/22/2013