

1R - 427-73

APPROVALS

YEAR(S):

2013

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 (lpena@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

RECEIVED

April 22, 2013

APR 22 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.

The junction box site location map, final report, initial report and checklist, disturbed area, 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.

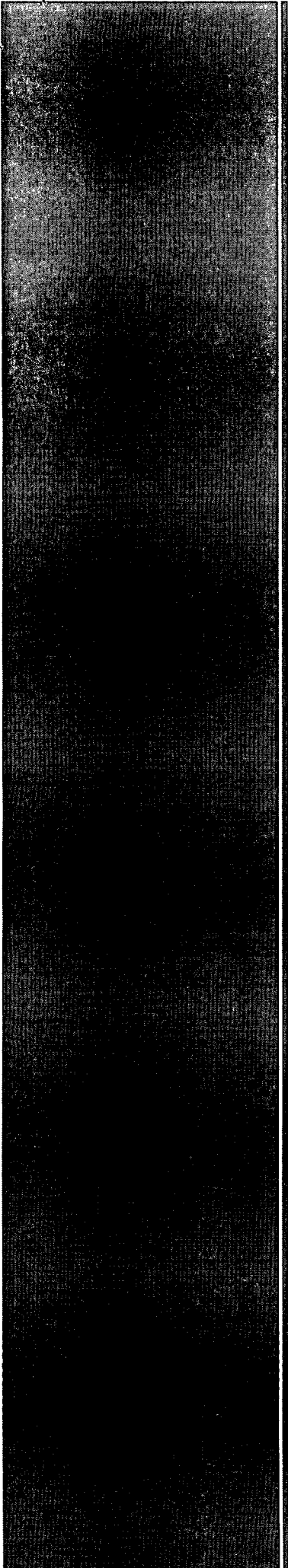
Sincerely,
RICE Operating Company

A handwritten signature in black ink, appearing to read 'H. Conder', with a stylized, flowing script.

Hack Conder
Environmental Manager

enclosures

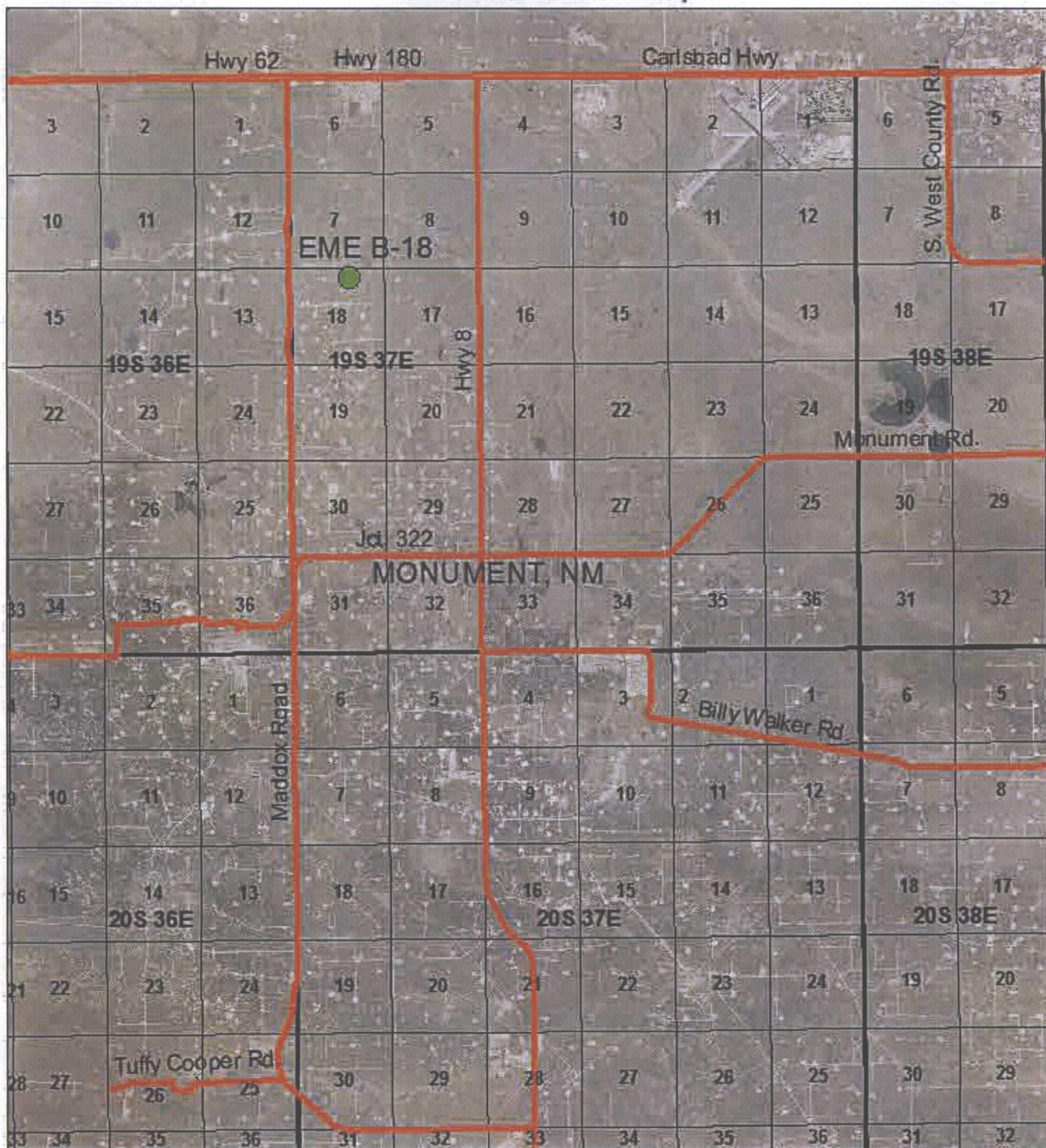
RECEIVED OGD
2013 APR 24 P 2:24



Site Location Map

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

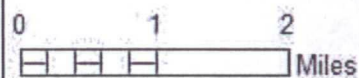
Site Location Map



EME B-18

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

NMOCD Case #: 1R427-73



Drawing date: 4/2/2013



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	B-18	B	18	19S	37E	LEA	Length 8	Width 8	Depth 5

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER JIMMIE T COOPER OTHER _____

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 C&C LANDFARM Location MONUMENT, NM

FINAL ANALYTICAL RESULTS: Sample Date 02/08/2002 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	<0.025	<0.025	<0.025	<0.025	<10	155	154
BOTTOM	<0.025	<0.025	<0.025	<0.025	<10	102	222

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.

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS	6'	100
BOTTOM	7'	200

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

SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

ENVIRONMENTAL LAB OF I, LTD.

"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)

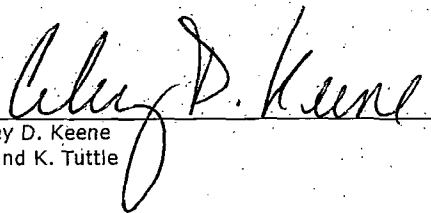
Sample Type: Soil
Sample Condition: Intact/ Iced/ 4.0 deg C/ * 10 deg C
Project Name: Rice Operating
Project #: None Given
Project Location: B-18

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

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg	SAMPLE 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


Celley D. Keene
Randall K. Tuttle


Date

ENVIRONMENTAL LAB OF I, LTD.

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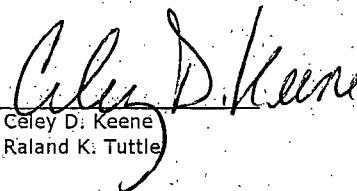
Sample Type: Soil
Sample Condition: Intact/ Iced/ 4.0 deg C/ * 10 deg C
Project Name: Rice Operating
Project #: None Given
Project Location: B-18

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

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

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

Methods: SW 846-8015M

 02/13/02
Caley D. Keene Date
Randal K. Tuttle

ENVIRONMENTAL LAB OF I, LTD.

"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)

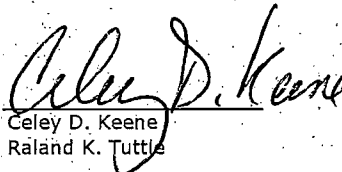
Sample Type: Soil
Sample Condition: Intact/ Iced/ 4.0 deg C/ * 10 deg C
Project Name: Rice Operating
Project #: None Given
Project Location: B-18

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

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

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	625
ORIGINAL SAMPLE	222
SPIKE	853
SPIKE DUP	853
% EXTRACTION ACCURACY	101
BLANK	<5.00
RPD	0.0

Methods: SW 846-9253

 02/13/02
Celey D. Keene Date
Randall K. Tuttle

12600 West I-20 East
Odessa, Texas 79763

Fax: 915-563-1713

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

Company Name RF Environmental

Company Address:

City/State/Zip:

Telephone No:

Sampler Signature:

Project Name: Rice Operating

Project #:

Project Loc: B-18

PO #:

Fax No:

[illegible]

C & C LANDFARM, INC.

BOX 55

MONUMENT, NEW MEXICO 88265

PHONE: (505) 397-2045

(505) 397-2860

(505) 392-2236

001819

COMPANY NAME

Rice Operating Co

COMPANY REPRESENTATIVE NAME

Dennis Anderson

LEASE NAME

B-18

SEC.

TOWNSHIP

RANGE

TRUCKING COMPANY NAME

R.F. Erwin

DRIVERS SIGNATURE

[Signature]

TYPE OF MATERIAL BEING HAULED AND QUANTITY

110 yds

aily cont soil

COPY OF ANALYSIS ATTACHED, IF REQUIRED

non Hg

TPHC

under 10,000

BENZENE

TOLUENE

ETHYL BENZENE

PARA XYLENE

ATTENDANT ON DUTY

[Signature]

DATE

2-8-00

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