

1R - 427-157

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, June 10, 2013 11:34 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 (1R427-157) Termination - ROC EME Jct M-19 Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct M-19 Site
Unit Letter M, Section 19, T19S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-157) 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 June 3, 2013 (received June 6, 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 (1R427-157) 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*

122 West Taylor • Hobbs, New Mexico 88240

Phone: (575) 393-9174 • Fax: (575) 397-1471

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 9231

RECEIVED

JUN 6 2013

June 3, 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. M-19 (1R427-157): UL/M, Sec. 19, 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 2004, ROC initiated work on the former M-19 junction box. The site is located in UL/M, Sec. 19, T19S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 40 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 9x3x12 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 12 ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration, a gasoline range organics (GRO) and a diesel range organics (DRO) concentration below detectable limits. The excavated soil was returned to the excavation and contoured to the surrounding area. Vegetation has rebounded at the site so no seeding of the site is necessary. Vegetation will act as an evapo-transpiration barrier that will also inhibit the migration of chlorides and hydrocarbons. Plants capture water through their roots and so reduce the amount of water infiltrating below the root zone. A junction box is no longer needed at the site.

The junction box site location map, area map, final report, photodocumentation, chloride graph, 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



Hack Conder
Environmental Manager

enclosures

RECEIVED OGD
2013 JUN -6 P 2:08

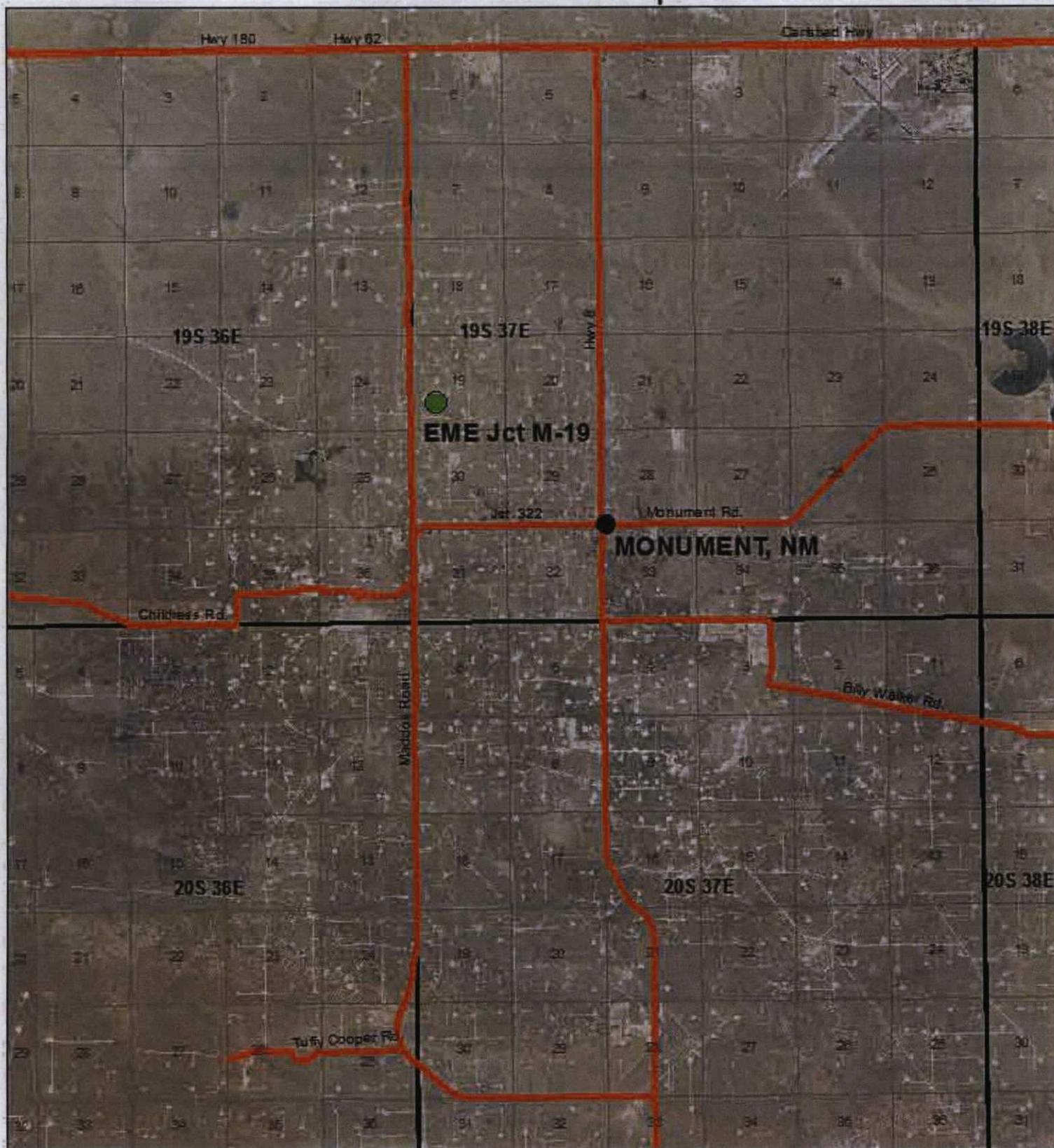
Site Maps

RICE *Operating Company* (ROC)

112 West Taylor Hobbs, NM 88240

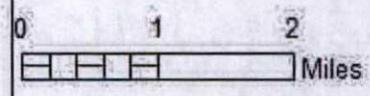
Phone: (575) 393-9174 Fax: (575) 397-1471

Site Location Map



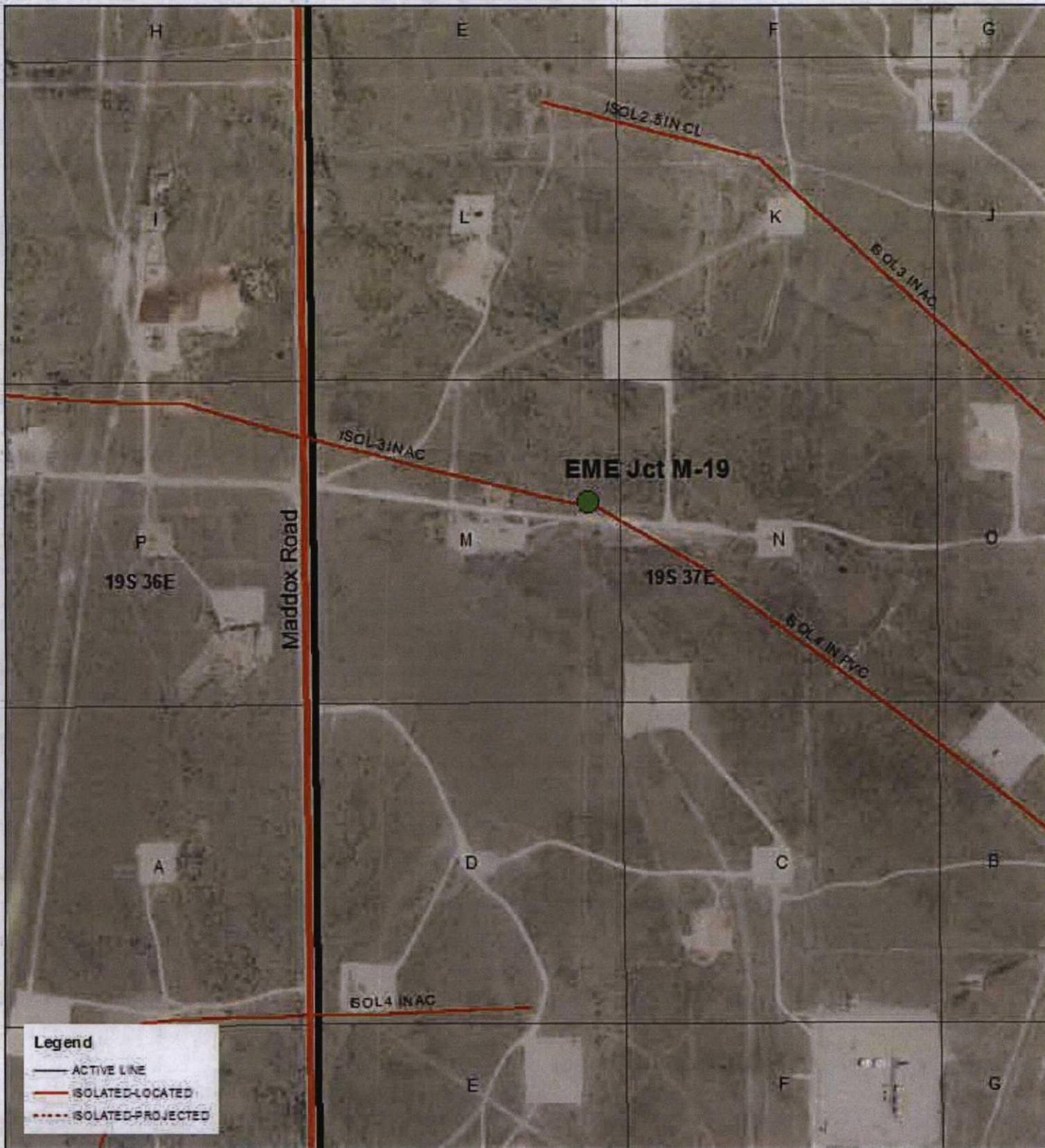
**EME Jct M-19
(1R427-157)**

UL/M SECTION 19
T19S, R37E
LEA COUNTY, NM



Drawing date: 5/06/13/LES

Area Map



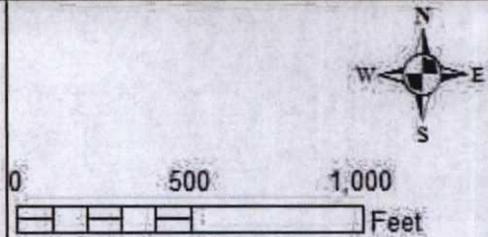
Legend

- ACTIVE LINE
- ISOLATED-LOCATED
- ISOLATED-PROJECTED



EME Jct M-19 (1R427-157)

UL/M SECTION 19
T19S, R37E
LEA COUNTY, NM



Drawing date: 5/16/13 LS

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	M-19	M	19	19S	37E	Lea	eliminated—no box		

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

Depth to Groundwater 40 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 9/29/2004 Date Completed 10/27/2004 NMOCD Witness no

Soil Excavated 12 cubic yards Excavation Length 9 Width 3 Depth 12 feet

Soil Disposed 0 cubic yards Offsite Facility n/a Location n/a

FINAL ANALYTICAL RESULTS: Sample Date 10/1/2004 Sample Depth 12 ft

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 ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
GRAB @ 12 ft BELOW JUNCTION	0.1	<10.0	<10.0	<20.0

LOCATION	DEPTH (ft)	ppm
vertical below junction box	4	116
	5	142
	6	146
	7	117
	8	144
	9	143
	10	145
	11	115
	12	115
	background	1

General Description of Remedial Action: This junction box was located within an unfenced production battery that is no longer in use. The surface surrounding the box contained gravel from the facility and vegetation was not present. The junction was eliminated and the box lumber was removed. A vertical delineation trench was made with a backhoe at the box site. Chloride field tests and PID screenings were conducted every vertical foot of the trench at 4-12 ft. Chloride field tests yielded concentrations that were very low and similar to background levels. All PID readings were 0.1 ppm. The soil under the box consisted of brown sand and caliche at 4-11 ft with no staining or signs of chloride or hydrocarbon contamination. At 12 ft BGS, sandstone was encountered. Since the hydrocarbon concentrations were non-detect and below NMOCD guidelines and chloride concentrations were less than 250 ppm, the 12-ft-deep trench was backfilled with the excavated soils.

enclosures: chloride graph, photos, lab results

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

SITE SUPERVISOR Joe Gatts SIGNATURE not available COMPANY RICE Operating Company

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE Kristin Farris Pope
DATE 3/8/2005 TITLE Project Scientist



undisturbed junction box (looking North) 3/29/2004

EME jet. M-19

unit 'M', sec. 19, T19S, R37E



box removed; before excavation (looking South) 9/28/2004

EME jct. M-19

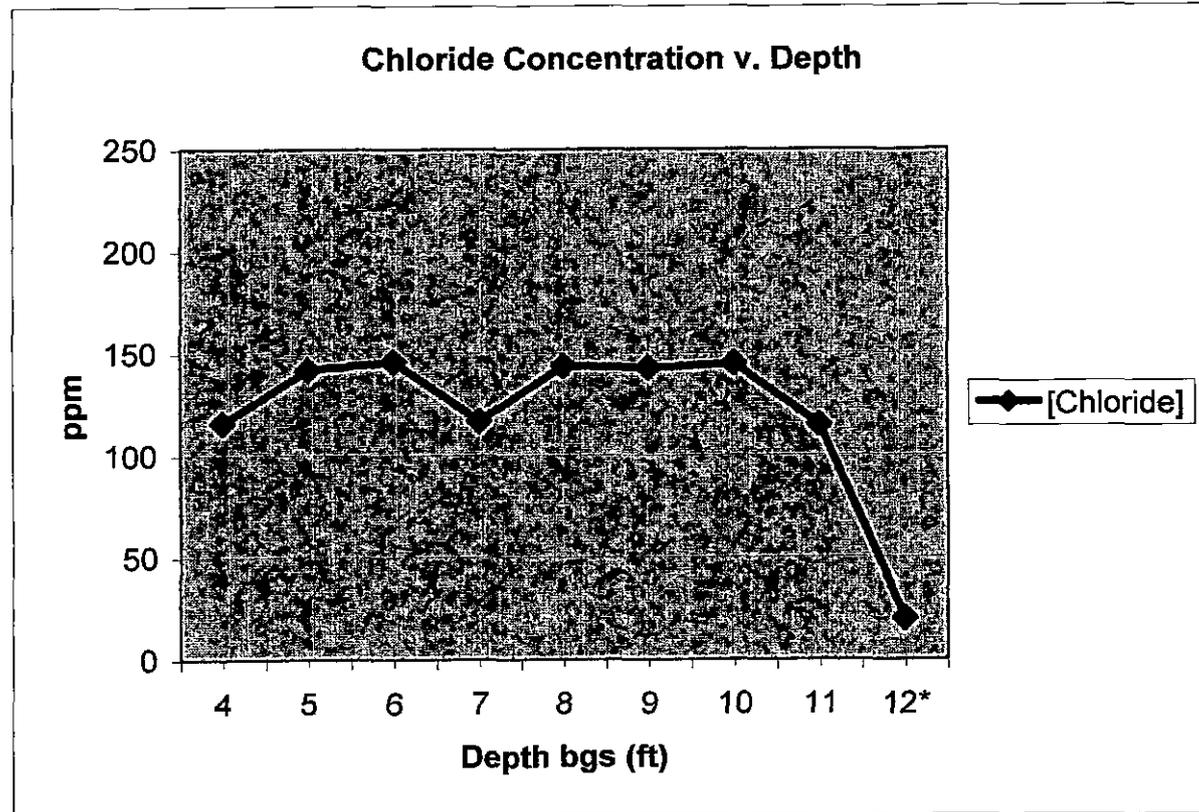
T19S, R37E

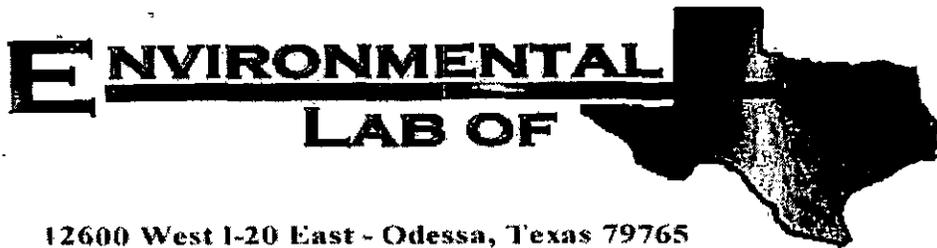
Vertical Delineation at Junction

Depth bgs (ft)	[Cl] ppm
4	116
5	142
6	146
7	117
8	144
9	143
10	145
11	115
12*	20

* lab analysis yielded non-detect chloride (<20.0 ppm)

Groundwater = 40 ft





12600 West I-20 East - Odessa, Texas 79765

COPY

Analytical Report

Prepared for:

Roy Rascon
Rice Operating Co.
122 W. Taylor
Hobbs, NM 88240

Project: EME Jct. M-19
Project Number: None Given
Location: None Given

Lab Order Number: 4J14001

Report Date: 10/18/04

Ricè Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: EME Jct. M-19
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
10/18/04 16:58

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Grab at Source at 12' bgs	4J14001-01	Soil	10/01/04 13:30	10/14/04 07:00

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: EME Jct. M-19
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
10/18/04 16:58

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Grab at Source at 12' bgs (4J14001-01) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EJ41416	10/14/04	10/15/04	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		104 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		118 %	70-130		"	"	"	"	

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: EME Jct. M-19
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
10/18/04 16:58

General Chemistry Parameters by EPA / Standard Methods
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Grab at Source at 12' bgs (4J14001-01) Soil									
Chloride	ND	20.0	mg/kg Wet	2	EJ41814	10/14/04	10/18/04	SW 846 9253	
% Moisture	13.0		%	1	EJ41503	10/14/04	10/15/04	% calculation	

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: EME Jct. M-19
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
10/18/04 16:58

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EJ41416 - Solvent Extraction (GC)										
Blank (EJ41416-BLK1)										
Prepared: 10/14/04 Analyzed: 10/15/04										
Gasoline Range Organics C6-C12	ND	10.0	mg/kg wet							
Diesel Range Organics >C12-C35	ND	10.0	"							
Total Hydrocarbon C6-C35	ND	10.0	"							
Surrogate: 1-Chlorooctane	35.7		mg/kg	50.0		71.4	70-130			
Surrogate: 1-Chlorooctadecane	39.8		"	50.0		79.6	70-130			
LCS (EJ41416-BS1)										
Prepared: 10/14/04 Analyzed: 10/15/04										
Gasoline Range Organics C6-C12	450	10.0	mg/kg wet	500		90.0	75-125			
Diesel Range Organics >C12-C35	513	10.0	"	500		103	75-125			
Total Hydrocarbon C6-C35	963	10.0	"	1000		96.3	75-125			
Surrogate: 1-Chlorooctane	46.7		mg/kg	50.0		93.4	70-130			
Surrogate: 1-Chlorooctadecane	43.4		"	50.0		86.8	70-130			
Calibration Check (EJ41416-CCV1)										
Prepared: 10/14/04 Analyzed: 10/15/04										
Gasoline Range Organics C6-C12	502		mg/kg	500		100	80-120			
Diesel Range Organics >C12-C35	574		"	500		115	80-120			
Total Hydrocarbon C6-C35	1080		"	1000		108	80-120			
Surrogate: 1-Chlorooctane	51.6		"	50.0		103	70-130			
Surrogate: 1-Chlorooctadecane	60.1		"	50.0		120	70-130			
Matrix Spike (EJ41416-MS1)										
Source: 4J14001-01 Prepared: 10/14/04 Analyzed: 10/15/04										
Gasoline Range Organics C6-C12	556	10.0	mg/kg dry	575	ND	96.7	75-125			
Diesel Range Organics >C12-C35	621	10.0	"	575	ND	108	75-125			
Total Hydrocarbon C6-C35	1180	10.0	"	1150	ND	103	75-125			
Surrogate: 1-Chlorooctane	48.0		mg/kg	50.0		96.0	70-130			
Surrogate: 1-Chlorooctadecane	48.2		"	50.0		96.4	70-130			
Matrix Spike Dup (EJ41416-MSD1)										
Source: 4J14001-01 Prepared: 10/14/04 Analyzed: 10/15/04										
Gasoline Range Organics C6-C12	530	10.0	mg/kg dry	575	ND	92.2	75-125	4.79	20	
Diesel Range Organics >C12-C35	564	10.0	"	575	ND	98.1	75-125	9.62	20	
Total Hydrocarbon C6-C35	1090	10.0	"	1150	ND	94.8	75-125	7.93	20	
Surrogate: 1-Chlorooctane	52.1		mg/kg	50.0		104	70-130			
Surrogate: 1-Chlorooctadecane	50.0		"	50.0		100	70-130			

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

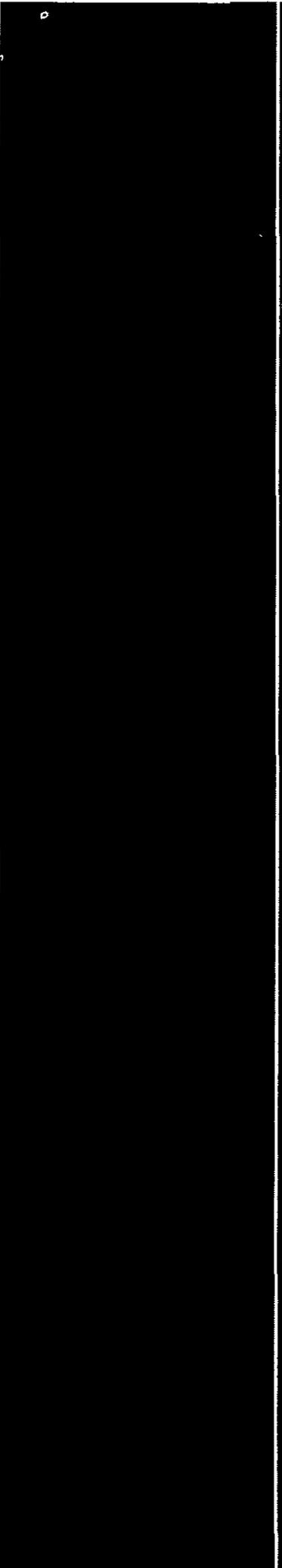
Project: EME Jct. M-19
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
10/18/04 16:58

**General Chemistry Parameters by EPA / Standard Methods - Quality Control
Environmental Lab of Texas**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EJ41503 - % Solids										
Blank (EJ41503-BLK1) Prepared: 10/14/04 Analyzed: 10/15/04										
% Moisture	0.0		%							
Duplicate (EJ41503-DUP1) Source: 4J13011-01 Prepared: 10/14/04 Analyzed: 10/15/04										
% Moisture	14.0		%		13.0			7.41	20	
Batch EJ41814 - Water Extraction										
Blank (EJ41814-BLK1) Prepared: 10/11/04 Analyzed: 10/18/04										
Chloride	ND	20.0	mg/kg Wet							
Matrix Spike (EJ41814-MS1) Source: 4J08006-02 Prepared: 10/11/04 Analyzed: 10/18/04										
Chloride	468	20.0	mg/kg Wet	500	0.00	93.6	80-120			
Matrix Spike Dup (EJ41814-MSD1) Source: 4J08006-02 Prepared: 10/11/04 Analyzed: 10/18/04										
Chloride	478	20.0	mg/kg Wet	500	0.00	95.6	80-120	2.11	20	
Reference (EJ41814-SRM1) Prepared & Analyzed: 10/18/04										
Chloride	5000		mg/kg	5000		100	80-120			



Current Photodocumentation

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

EME Jct. M-19 (1R427-157)

UL/M, Section 19, T19S, R37E



Facing south

4/23/2013



Facing east

4/23/2013