

1R - 427-151

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, July 18, 2013 9:01 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 (1R427-151) Termination - ROC EME Jct J-18 Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct J-18 Site
Unit Letter J, Section 18, T19S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-151) 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 27, 2013 (received July 1, 2013). The report is 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 (1R427-151) 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

RECEIVED OCD

2013 JUL -1 P 2: 17

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8890

June 27, 2012

Mr. Edward Hansen

New Mexico Energy, Minerals, & Natural Resources
Oil Conservation Division, Environmental Bureau
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

RE: Termination Request
EME Jct. J-18 (1R427-151): UL/J, 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 and Previous Work

In 2004, ROC initiated work on the former EME J-18 junction box. The site is located in UL J, Sec. 18, T19S, 37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 60 +/- feet. The site was delineated using a hand auger to form a 6x9x3-ft deep excavation and soil samples were screened at regular intervals for both hydrocarbons and chlorides. Each sample was field titrated for chlorides and screened for TPH, resulting in a chloride concentration representative of background concentrations and low PIDs. The excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area. The site was seeded with a blend of native vegetation. Vegetation has rebounded at this site; vegetation will act as an evapo-transpiration barrier that will also inhibit the downward 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 this site.

The junction box site location map, area 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 long horizontal flourish extending to the right.

Hack Conder
Environmental Manager

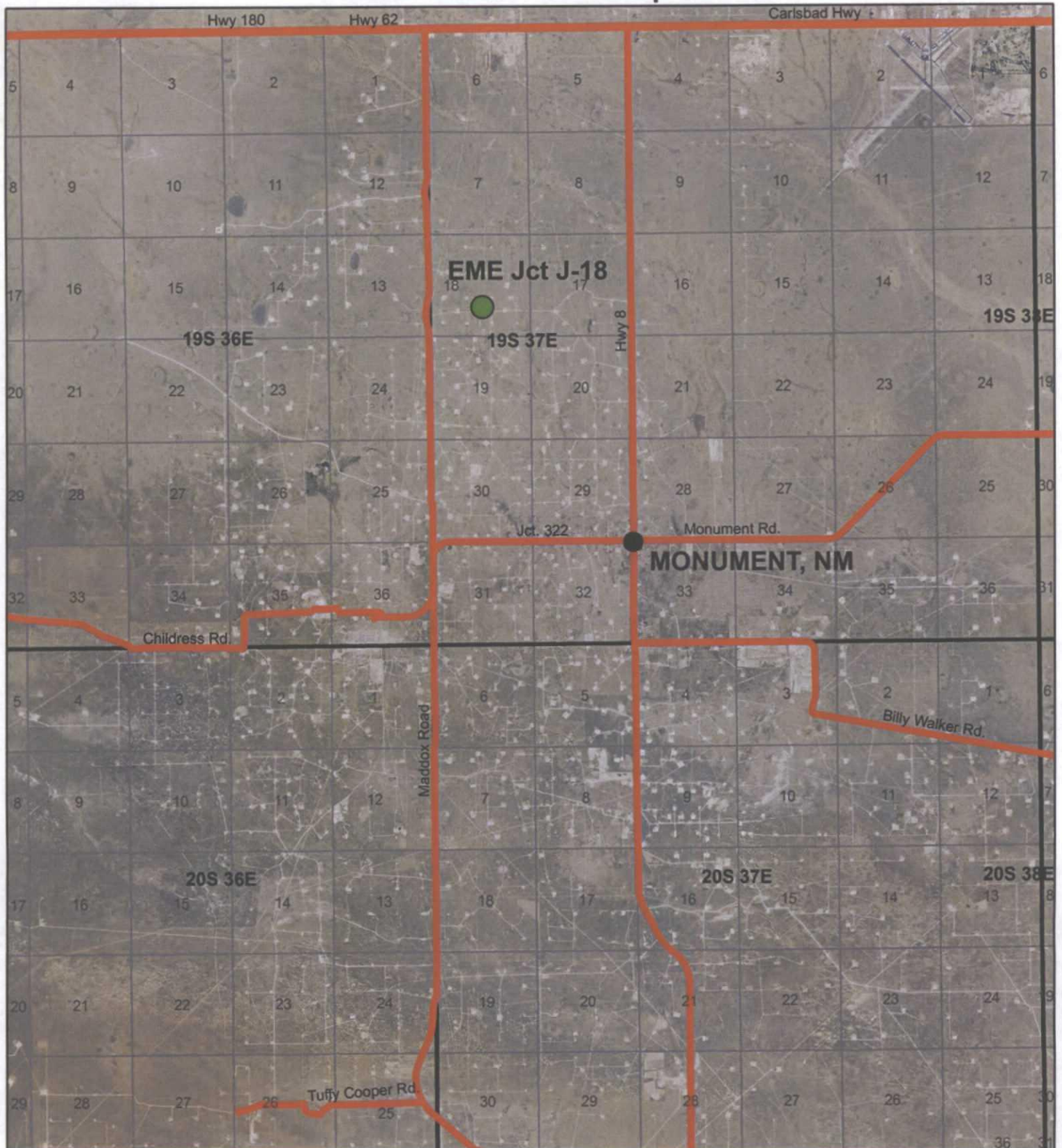
enclosures



Site Maps

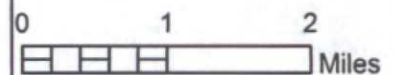
RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471

Site Location Map



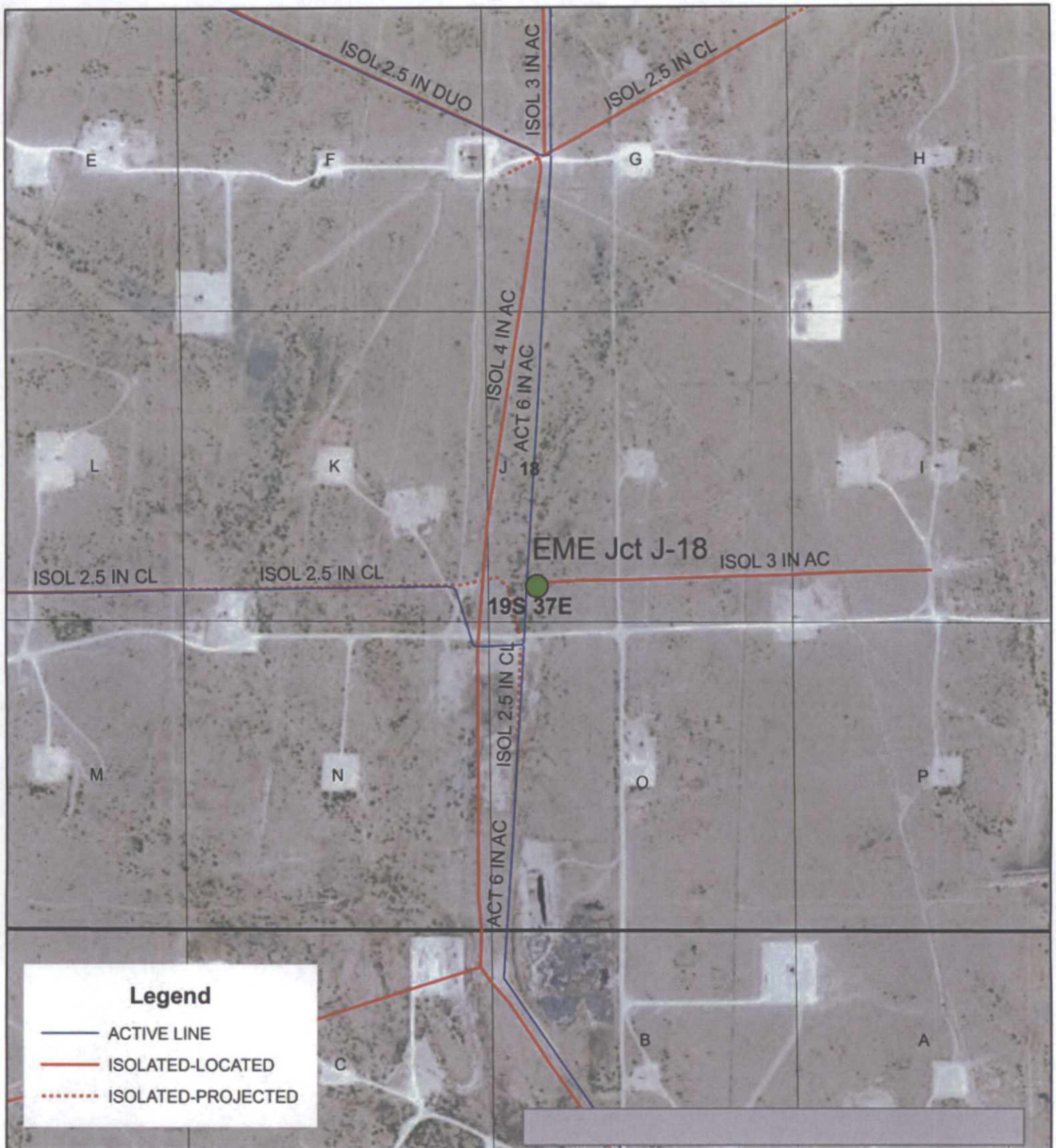
EME Jct J-18
(1R0427-151)

UL/J SECTION 18
T19S, R37E
LEA COUNTY, NM



Drawing date: 6/18/13 LS

Area Map



Legend

- ACTIVE LINE
- ISOLATED-LOCATED
- ISOLATED-PROJECTED



EME Jct J-18 (1R0427-151)

UL/J SECTION 18
T19S, R37E
LEA COUNTY, NM



0 500 1,000
Feet

Drawing date: 6/18/13 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		
EME	J-18	J	18	19S	37E	Lea	Length	Width	Depth
							no box--eliminated		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER Jimmie T. Cooper OTHER _____

Depth to Groundwater 60 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 5/27/2004 Date Completed 8/11/2004 OCD Witness No

Soil Excavated 6 cubic yards Excavation Length 6 Width 9 Depth 3 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 8/11/2004 Sample Depth 3 ft

Procure 5-point composite sample of bottom and 4-point composite sample of sidewalls. 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
4-WALL COMP.	2.0	<10.0	<10.0	144
BOTTOM COMP.	2.1	<10.0	<10.0	96

LOCATION	DEPTH (ft)	ppm
background	0	119
bottom of box	3	171
4-wall comp.	0-3	121

General Description of Remedial Action: This junction was eliminated as the pipeline was re-plumbed straight-through. The junction box site did not exhibit any physical signs of hydrocarbon or chloride impact. Samples were collected at the site using a hand auger and were field-tested for chloride and screened with a PID. Field chloride tests yielded concentrations similar to background levels and laboratory tests confirmed TPH concentrations in non-detect levels, meeting NMOCD guidelines. The hole left by the box was backfilled using clean, imported soils. The graded surface was seeded with a blend of native vegetation and is expected to return to productive capacity at a normal rate.

enclosures: photos, lab results, PID screenings

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

SITE SUPERVISOR Israel Juarez SIGNATURE Israel Juarez COMPANY RICE Operating Company

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE Kristin Farris Pope

DATE 9/22/2004 TITLE Project Scientist

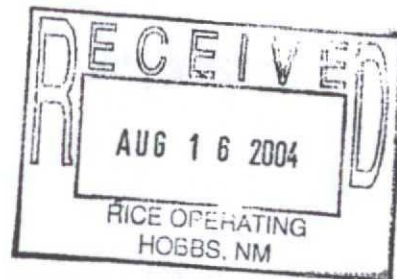


ARDINAL LABORATORIES

PHONE (325) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
RICE OPERATING CO.
ATTN: KRISTIN FARRIS
122 W. TAYLOR
HOBBS, NM 88240
FAX TO: (505) 397-1471



Receiving Date: 08/11/04
Reporting Date: 08/12/04
Project Number: NOT GIVEN
Project Name: EME JCT. J-18
Project Location: NOT GIVEN

Sampling Date: 08/11/04
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)	CI* (mg/Kg)
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ANALYSIS DATE	08/11/04	08/11/04	08/12/04
H8998-1 WALL COMP.	<10.0	<10.0	144
H8998-2 BTM COMP.	<10.0	<10.0	96
Quality Control	777	785	1010
True Value QC	800	800	1000
% Recovery	97.1	98.2	101
Relative Percent Difference	3.4	2.3	3.1

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

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

Chemist

Date

H8998.XLS

PLEASE NOTE: **Liability and Damages.** Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



Current Photodocumentation

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

EME Jct. J-18 (1R427-151)

UL/J, Section 18, T19S, R37E



Facing north

5/10/2013



Facing west

5/10/2013