

1R - 427-145

# APPROVALS

YEAR(S):

2013

**Hansen, Edward J., EMNRD**

---

**From:** Hansen, Edward J., EMNRD  
**Sent:** Monday, August 26, 2013 11:09 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 (1R427-145) Termination - ROC EME O-24-1 Site

**RE: Termination Request  
for the Rice Operating Company's  
EME O-24-1 Site  
Unit Letter O, Section 24, T20S, R36E, NMPM, Lea County, New Mexico  
Remediation Plan (1R427-145) 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 August 9, 2013 (received August 14, 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 (1R427-145) 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 9361

August 9, 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

RE: Termination Request  
EME Jct. O-24-1 (1R427-145): UL/O, Sec. 24, T20S, R36E  
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 O-24-1 junction box. The site is located in UL O, Sec. 24, T20S, R36E. An updated groundwater survey of NM OSE records, completed in 2013, indicates that groundwater would likely be encountered at a depth of approximately 72 +/- feet. The site was delineated using a backhoe to form a 10x10x12 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 low concentrations for chlorides and TPH. The bottom grab sample was sent to a commercial laboratory for analysis, resulting in a chloride concentration of 42.5 mg/kg and concentration of gasoline range organics (GRO) and a diesel range organics (DRO) below detectable limits. The excavated soils were blended and a sample was sent to a commercial laboratory for analysis, resulting in a chloride concentration of 48 mg/kg and GRO and DRO concentrations below detectable limits. The excavation was backfilled with the blended backfill to ground surface and contoured to the surrounding area. On 8/4/2004, 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

RECEIVED OOD  
AUG 11 11 09 21

site.

The junction box site location map, area map, final report, photodocumentation, chloride graph, laboratory analysis, PID sheet, groundwater directional map 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)393-2967 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.

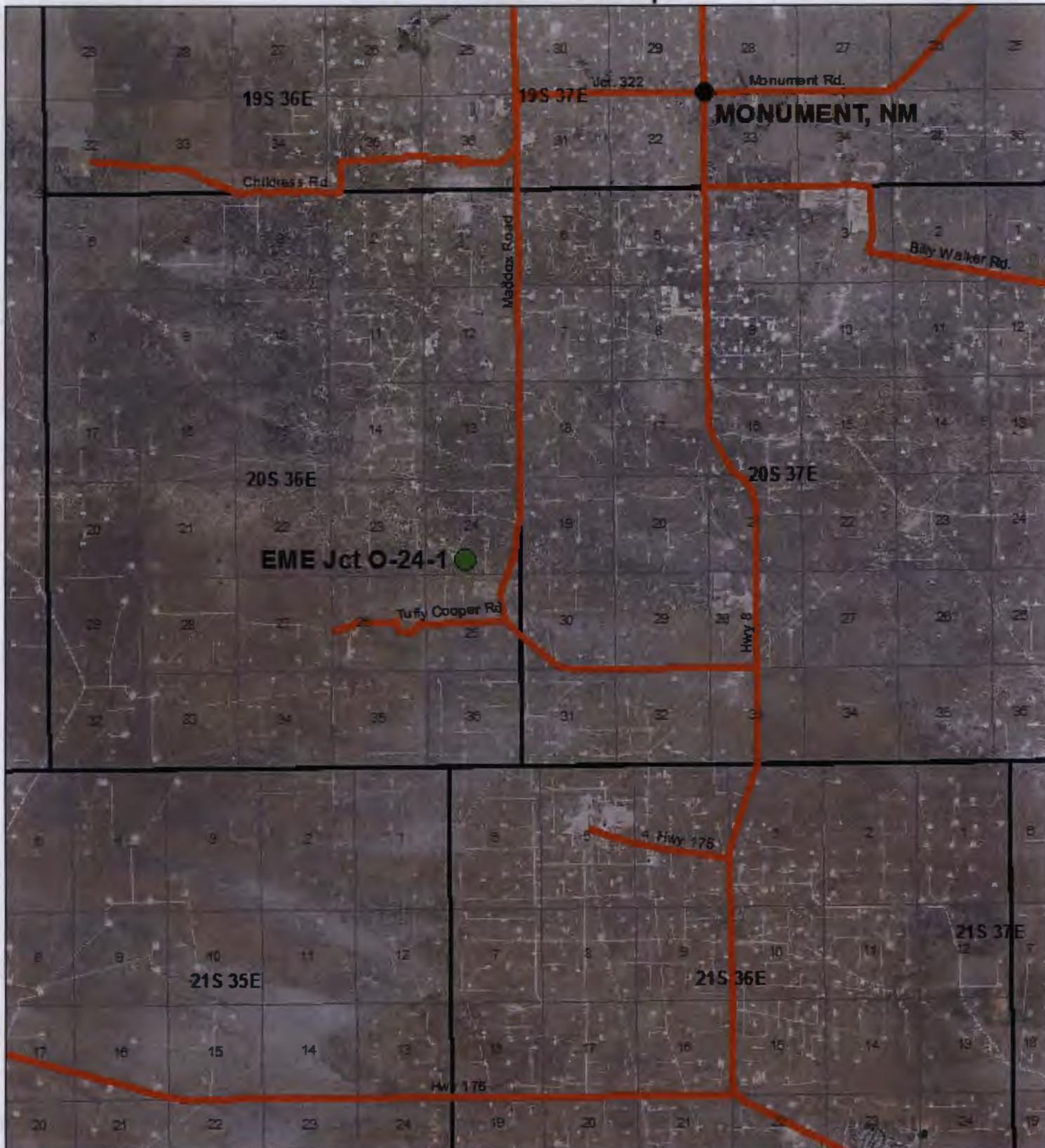
Hack Conder  
Environmental Manager

enclosures

# Site Maps

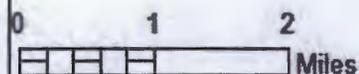
**RICE *Operating Company* (ROC)**  
112 West Taylor Hobbs, NM 88240  
Phone: (575) 393-9174 Fax: (575) 397-1471

# Site Location Map



**EME Jct O-24-1  
(1R427-145)**

**UL/O SECTION 24  
T20S, R36E  
LEA COUNTY, NM**



Drawing date: 5/06/13/LES

# Area Map



**Legend**

- ACTIVE LINE
- ISOLATED-LOCATED
- ⋯ ISOLATED-PROJECTED
- Areas with no groundwater



**EME Jct O-24-1**  
**(1R427-145)**

UL/O SECTION 24  
 T20S, R36E  
 LEA COUNTY, NM

0                      500                      1,000  
 Feet

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	O-24-1	O	24	20S	36E	Lea	eliminated--no box		

LAND TYPE: BLM \_\_\_\_\_ STATE \_\_\_\_\_ FEE LANDOWNER Dale Cooper Family Trust OTHER \_\_\_\_\_

Depth to Groundwater 36-117? feet NMOCD SITE ASSESSMENT RANKING SCORE: ? \*

Date Started 5/19/2004 Date Completed 6/16/2004 OCD Witness No

Soil Excavated 44 cubic yards Excavation Length 10 Width 10 Depth 12 feet

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

**FINAL ANALYTICAL RESULTS:** Sample Date 5/21/2004 Sample Depth 12 ft

Procure 5-point composite sample of bottom. 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
BOTTOM	0.0 (grab)	<10.0	<10.0	42.5
BACKFILL	0.0	<10.0	<10.0	48

LOCATION	DEPTH (ft)	ppm
Vertical	6	449
at source	7	359
	8	689
	9	929
	10	539
	11	629
	12	299
5 ft West	6	149
	8	179
	10	179
	12	149
5 ft East	6	119
	8	209
	10	179
	12	89

**General Description of Remedial Action:** Delineation and excavation were performed at this junction box site with a backhoe as chloride field tests and PID field screenings were conducted at regular intervals. Vertical delineation at the box yielded an overall trend of chloride decline and low concentrations. A spike was observed at around 9 ft indicating a mass of historical chloride that has been flushed through the loose sand by recent rains (see graph). The graph indicates non-saturated vadose conditions that are not threatening to groundwater. All PID readings were 0.0 ppm and laboratory results confirmed TPH concentrations well below NMOCD guidelines. Soils from the 10 x 10 x 12-ft deep excavation were blended before they were backfilled into the hole. The surface has been contoured and will be seeded with a blend of native vegetation. This junction has been eliminated with a new pipeline re-plumbed straight through.

enclosures: groundwater map, chloride graph, photos, lab results, PID field screenings

\* Depth to groundwater here is ambiguous. USGS maps indicate that the site is located on a hydrogeologic boundary or fault north of which groundwater is around 36 ft but is 117 ft to the south.

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

SITE SUPERVISOR Rob Elam SIGNATURE *Rob Elam* COMPANY Curt's Environmental--Odessa, TX

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE *Kristin Farris Pope*

DATE 8/5/2004 TITLE Project Scientist

# EME jct. O-24-1

unit 'O', Sec. 24, T20S, R36E



Undisturbed junction box

5/7/2004



backhoe delineation

5/19/2004



seedling disturbed surface

8/4/2004

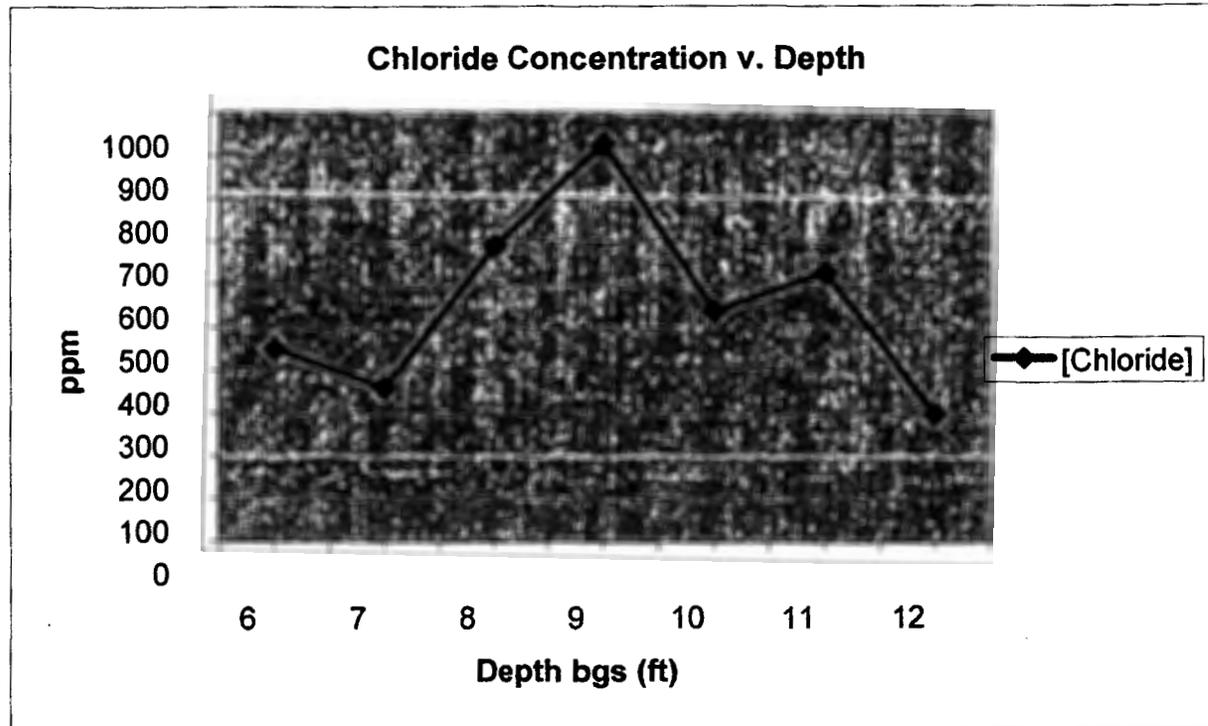
### EME jct. O-24-1

T20S, R36E

Vertical Delineation at Source

Depth bgs (ft)	Cl (ppm)
6	449
7	359
8	689
9	929
10	539
11	629
12	299

Groundwater = 36-117 ft





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: ROY RASCON  
 122 W. TAYLOR  
 HOBBS, NM 88240  
 FAX TO: (505) 397-1471

Receiving Date: 07/30/04  
 Reporting Date: 08/02/04  
 Project Number: NOT GIVEN  
 Project Name: JCT O-24-1  
 Project Location: EME

Sampling Date: 07/30/04  
 Sample Type: SOIL  
 Sample Condition: COOL & INTACT  
 Sample Received By: HM  
 Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	GRO (C <sub>6</sub> -C <sub>10</sub> ) (mg/Kg)	DRO (>C <sub>10</sub> -C <sub>28</sub> ) (mg/Kg)	Cl* (mg/Kg)
ANALYSIS DATE		08/02/04	08/02/04	08/02/04
H8961-1	BACKFILL COMPOSITE	<10.0	<10.0	48
Quality Control		785	749	1000
True Value QC		800	800	1000
% Recovery		98.1	93.7	100
Relative Percent Difference		0.6	2.2	1.0

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; Cl\*: Std. Methods 4500-ClB  
 \*Analyses performed on 1:4 w:v aqueous extracts.

  
 Chemist

  
 Date

H8961.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.



# CARDINAL LABORATORIES, INC.

2111 Beechwood, Abilene, TX 79603 101 East Marland, Hobbs, NM 88240  
(815) 673-7001 Fax (815) 673-7020 (505) 393-2326 Fax (505) 393-2476

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page \_\_\_\_ of \_\_\_\_

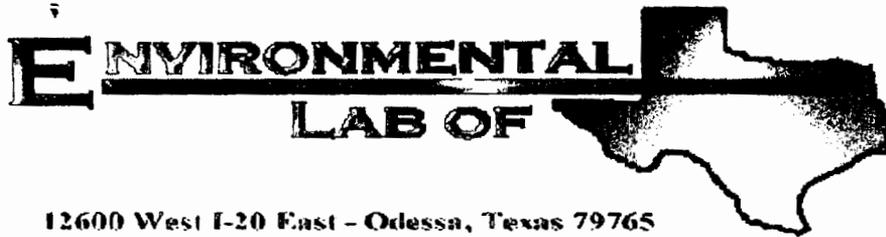
Company Name: <u>RICE Operating</u>				NLS TO				ANALYSIS REQUEST										
Project Manager: <u>Roy Baskon</u>				P.O. #:														
Address: <u>122 W. Taylor</u>				Company:														
City: <u>Hobbs</u>		State: <u>NM</u>		Zip: <u>88240</u>		Attn:												
Phone #: <u>393-9174</u>		Fax #: <u>397-1471</u>		Address:														
Project #:		Project Owner:		City:														
Project Name: <u>Jet 0-24-1</u>				State:				Zip:										
Project Location: <u>FME</u>				Phone #:														
Sampler Name: <u>Rob EIAM</u>				Fax #:														
FOR LAB USE ONLY																		
Lab I.D.	Sample I.D.	(GRAB OR COMP.)	# CONTAINERS	MATRIX						PRESERV.		SAMPLING		DATE	TIME	ANALYSIS	REMARKS	
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	REF COOL	OTHER:						
<u>A8461-1</u>	<u>Backfill Composite</u>	<u>C</u>	<u>1</u>		<u>/</u>								<u>7-30-04</u>	<u>9:00</u>			<u>8015</u>	<u>Chlorides</u>

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 the client for the 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 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 customers arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claims in based upon any of the above stated reasons or otherwise.

Terms and Conditions: Interest will be charged on all accounts more than 30 days past due at the rate of 24% per annum from the original date of invoice, and all costs of collections, including attorney's fees.

Sampler Relinquished: <u>Rob EIAM</u>		Date: <u>7-30-04</u>	Received By:	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No
		Time: <u>10:20</u>		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No
Relinquished By:		Date: <u>7-30-04</u>	Received By: (Lab Staff)	REMARKS: <u>LOTS FAX REPORT PLEASE</u>
		Time: <u>10:20</u>	<u>Hope S. McCreaw</u>	
Delivered By: (Circle One)		Sample Condition	Checked By:	
Sampler - UPS - Bus - Other:		Temp. °C (Intact?)	(Initials)	
		<u>cool</u> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

† Cardinal cannot accept verbal changes. Please fax written changes to (815) 673-7020.



12600 West I-20 East - Odessa, Texas 79765

## Analytical Report

**Prepared for:**

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

Project: Jct. O-24-1  
Project Number: None Given  
Location: EME

Lab Order Number: 4E25002

Report Date: 05/28/04

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

Project: Jct. O-24-1  
Project Number: None Given  
Project Manager: Kristin Farris

Fax: (505) 397-1471

Reported:  
05/28/04 10:47

**ANALYTICAL REPORT FOR SAMPLES**

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
12' Bottom	4E25002-01	Soil	05/21/04 16:30	05/25/04 08:05

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

Project: Jct. O-24-1  
Project Number: None Given  
Project Manager: Kristin Farris

Fax: (505) 397-1471  
Reported:  
05/28/04 10:47

**Organics by GC**  
**Environmental Lab of Texas**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
<b>12' Bottom (4E25002-01) Soil</b>									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EE42503	05/25/04	05/26/04	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		95.6 %	70-130	"	"	"	"	"	
Surrogate: 1-Chlorooctadecane		98.8 %	70-130	"	"	"	"	"	

Environmental Lab of Texas

*The results in this report apply to the samples analyzed in accordance with the samples received in the laboratory. This analytical report must be reproduced in its entirety, with written approval of Environmental Lab of Texas.*

*Roland K. Smith*

Quality Assurance Review

Page 2 of 6

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

Project: Jct. O-24-1  
Project Number: None Given  
Project Manager: Kristin Farris

Fax: (505) 397-1471  
Reported:  
05/28/04 10:47

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

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
<b>12' Bottom (4E25002-01) Soil</b>									
Chloride	42.5	20.0	mg/kg Wet	2	EE42609	05/26/04	05/26/04	SW 846 9253	
% Solids	86.0		%	1	EE42605	05/25/04	05/25/04	% calculation	

Environmental Lab of Texas

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*Roland K. Smith*

Quality Assurance Review

Page 3 of 6

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

Project: Jct. O-24-1  
Project Number: None Given  
Project Manager: Kristin Farris

Fax: (505) 397-1471  
Reported:  
05/28/04 10:47

**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
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**Batch EE42503 - Solvent Extraction (GC)**

<b>Blank (EE42503-BLK1)</b>		Prepared & Analyzed: 05/25/04								
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	43.3		mg/kg	50.0		86.6	70-130			
Surrogate: 1-Chlorooctadecane	43.4		"	50.0		86.8	70-130			

<b>LCS (EE42503-BS1)</b>		Prepared & Analyzed: 05/25/04								
Gasoline Range Organics C6-C12	417		mg/kg	500		83.4	75-125			
Diesel Range Organics >C12-C35	448		"	500		89.6	75-125			
Total Hydrocarbon C6-C35	865		"	1000		86.5	75-125			
Surrogate: 1-Chlorooctane	47.5		"	50.0		95.0	70-130			
Surrogate: 1-Chlorooctadecane	35.9		"	50.0		71.8	70-130			

<b>Calibration Check (EE42503-CCV1)</b>		Prepared: 05/25/04 Analyzed: 05/27/04								
Gasoline Range Organics C6-C12	403		mg/kg	500		80.6	80-120			
Diesel Range Organics >C12-C35	479		"	500		95.8	80-120			
Total Hydrocarbon C6-C35	882		"	1000		88.2	80-120			
Surrogate: 1-Chlorooctane	53.9		"	50.0		112	70-130			
Surrogate: 1-Chlorooctadecane	43.7		"	50.0		87.4	70-130			

<b>Matrix Spike (EE42503-MS1)</b>		Source: 4E25003-02	Prepared: 05/25/04 Analyzed: 05/26/04							
Gasoline Range Organics C6-C12	469	10.0	mg/kg dry	556	ND	84.4	75-125			
Diesel Range Organics >C12-C35	522	10.0	"	556	ND	93.9	75-125			
Total Hydrocarbon C6-C35	991	10.0	"	1110	ND	89.3	75-125			
Surrogate: 1-Chlorooctane	57.1		mg/kg	50.0		114	70-130			
Surrogate: 1-Chlorooctadecane	40.8		"	50.0		81.6	70-130			

<b>Matrix Spike Dup (EE42503-MSD1)</b>		Source: 4E25003-02	Prepared: 05/25/04 Analyzed: 05/26/04							
Gasoline Range Organics C6-C12	512	10.0	mg/kg dry	556	ND	92.1	75-125	8.77	20	
Diesel Range Organics >C12-C35	539	10.0	"	556	ND	96.9	75-125	3.20	20	
Total Hydrocarbon C6-C35	1050	10.0	"	1110	ND	94.6	75-125	5.78	20	
Surrogate: 1-Chlorooctane	59.9		mg/kg	50.0		120	70-130			
Surrogate: 1-Chlorooctadecane	43.1		"	50.0		86.2	70-130			

Environmental Lab of Texas

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*Roland K. Smith*

Quality Assurance Review

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

Project: Jct. O-24-1  
Project Number: None Given  
Project Manager: Kristin Farris

Fax: (505) 397-1471  
Reported:  
05/28/04 10:47

**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
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**Batch EE42605 - General Preparation (Prep)**

<b>Blank (EE42605-BLK1)</b>		Prepared & Analyzed: 05/25/04								
% Solids	100		%							
<b>Duplicate (EE42605-DUP1)</b>		Source: 4E24004-01		Prepared & Analyzed: 05/25/04						
% Solids	70.0		%		71.0			1.42	20	

**Batch EE42609 - Water Extraction**

<b>Blank (EE42609-BLK1)</b>		Prepared & Analyzed: 05/26/04								
Chloride	ND	20.0	mg/kg Wet							
<b>Matrix Spike (EE42609-MS1)</b>		Source: 4E25002-01		Prepared & Analyzed: 05/26/04						
Chloride	510	20.0	mg/kg Wet	500	42.5	93.5	80-120			
<b>Matrix Spike Dup (EE42609-MSD1)</b>		Source: 4E25002-01		Prepared & Analyzed: 05/26/04						
Chloride	521	20.0	mg/kg Wet	500	42.5	95.7	80-120	2.13	20	
<b>Reference (EE42609-SRM1)</b>		Prepared & Analyzed: 05/26/04								
Chloride	5000		mg/kg	5000		100	80-120			

Environmental Lab of Texas

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*Roland K. Smith*

Quality Assurance Review

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

Project: Jct. O-24-1  
Project Number: None Given  
Project Manager: Kristin Farris

Fax: (505) 397-1471  
Reported:  
05/28/04 10:47

### Notes and Definitions

DET Analyte DETECTED  
ND Analyte NOT DETECTED at or above the reporting limit  
NR Not Reported  
dry Sample results reported on a dry weight basis  
RPD Relative Percent Difference

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Environmental Lab of Texas

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*Roland K. Smith*

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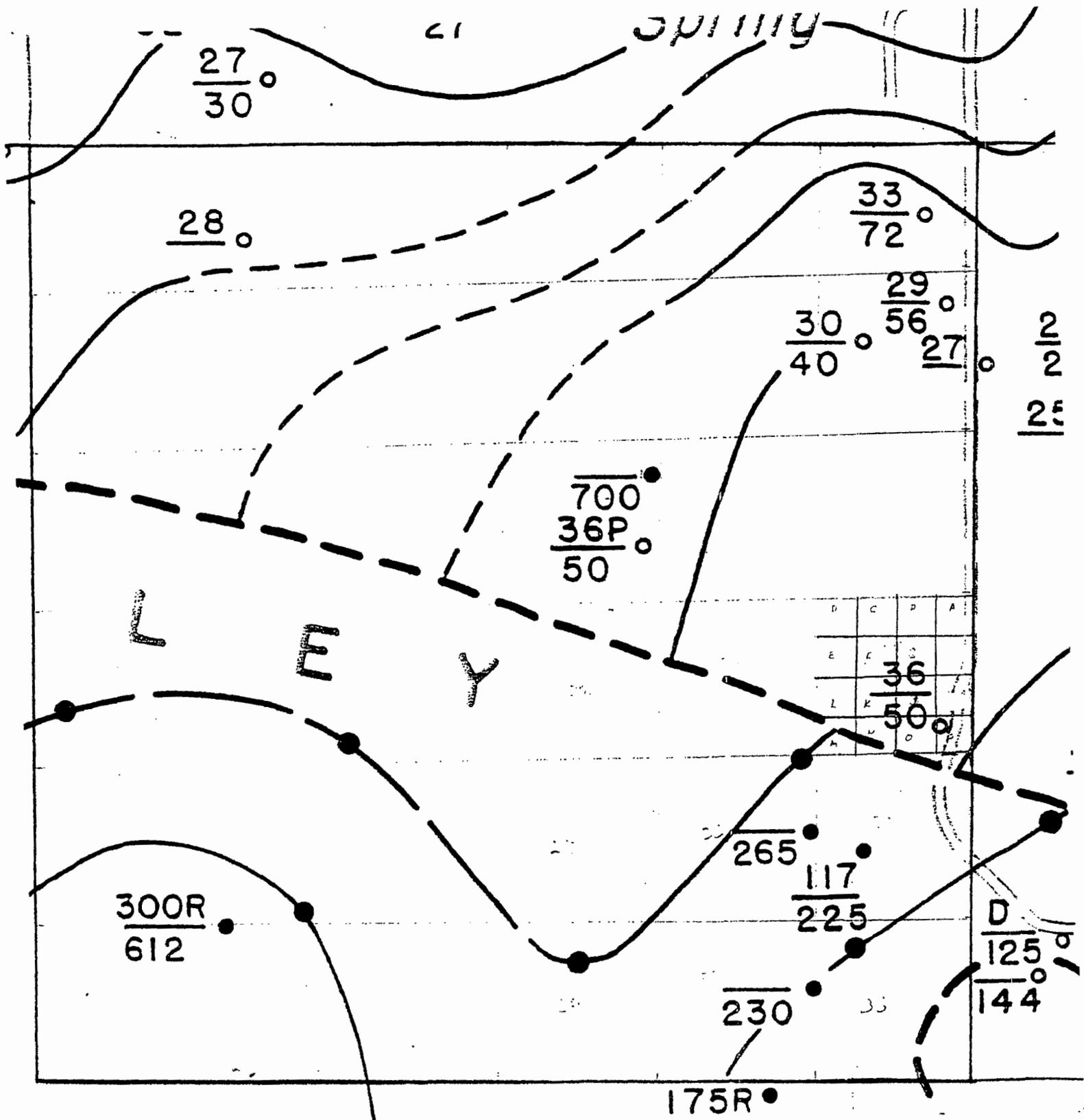
Quality Assurance Review

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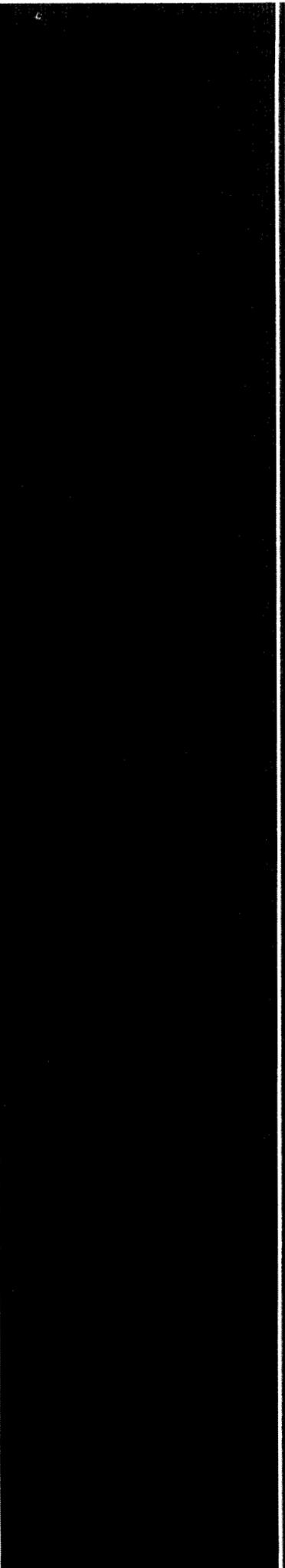




blown-up from Plate 2 Groundwater Map of Southern  
Map Lea County, New Mexico

from USGS book "Geology & Groundwater Conditions in  
 Southern Lea County, New Mexico.

by Nicholson & Clebsch 1961



# Current Photodocumentation

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

# EME Jct. O-24-1 (1R427-145)

UL/O, Section 24, T20S, R36E



Facing north

4/23/2013



Facing east

4/23/2013