

1R - 427-347

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, February 20, 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 (1R427-347) Termination - ROC EME Jct G-13 Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct G-13 Site
Unit Letter G, Section 13, T20S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-347) 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 February 7, 2013 (received February 11, 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 (1R427-347) 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

RECEIVED OGD

FEB 11 P 1:10

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8821

February 7, 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. G-13 (1R427-347): UL/G, Sec. 13, 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

In 2010, ROC initiated work on the former G-13 junction box. The site is located in UL/G, Sec. 13, T20S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 34 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x3x8 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 8 ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 192 mg/kg and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The excavated soil was returned to the excavation and contoured to the surrounding area. On 7/8/2010, the site was seeded with a blend of native vegetation. A junction box is no longer needed at the site. Vegetation has rebounded at the site, so no re-vegetation efforts are needed.

The junction box site location map, final report, photodocumentation, laboratory analysis, PID sheet, chloride graph 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 flourish at the end.

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



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
							Eliminated		
EUNICE- MONUMENT- EUMONT	Jct. G-13	G	13	20S	36E	Lea			

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

Depth to Groundwater 34 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 6/14/2010 Date Completed 7/8/2010 OCD Witness NO

Soil Excavated 4.4 cubic yards Excavation Length 5 Width 3 Depth 8 feet

Soil Disposed N/A cubic yards Offsite Facility N/A Location N/A

FINAL ANALYTICAL RESULTS: Sample Date 6/14/2010 Sample Depth 8 FT

TPH and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines.

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
SOURCE @ 8FT	0.0	<10	<10	192

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
Background	6"	56
vertical delineation of junction (source)	4'	59
	5'	56
	6'	418
	7'	204
	8'	196

General Description of Remedial Action: This junction and line were eliminated during the pipeline replacement/upgrade program. After the former junction box was removed, an investigation was conducted using a backhoe to collect soil samples at regular intervals producing a 5X3X8-ft. deep excavation. Chloride field tests performed on each sample yielded low concentrations. Organic vapors were measured using a PID, which yielded low concentrations. The deepest sample, 8 ft. BGS, was sent to a commercial laboratory for analysis of chloride and TPH, which confirmed low concentrations of each. The excavated soil was returned to the excavation to ground surface and contoured to the surrounding area. On 7/08/2010, the site was seeded with a blend of native vegetation and is expected to return to a normal capacity at a normal rate.

enclosures: photos, lab results, PID (field) screenings, chloride curve

SITE SUPERVISOR Joe Gatts SIGNATURE Not Available COMPANY Rice Operating Company

REPORT
ASSEMBLED BY Larry Bruce Baker Jr. INITIAL LBB

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE Larry Bruce Baker Jr. DATE 3-18-11

EME JCT G-13

UNIT G SEC. 13 T20S R36E



DELINEATION TRENCH BEING EXCAVATED

6/14/10



COLLECTING SAMPLE

6/14/10



SEEDING SITE

7/8/10



SITE COMPLETE

7/14/10



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: BRUCE BAKER
112 W. TAYLOR
HOBBS, NM 88240

Receiving Date: 06/14/10
Reporting Date: 06/16/10
Project Number: NOT GIVEN
Project Name: BD JCT G-13 (20/36)
Project Location: BD JCT G-13 (20/36)

Sampling Date: 06/14/10
Sample Type: SOIL
Sample Condition: INTACT
Sample Received By: JH
Analyzed By: AB/CK

LAB NUMBE SAMPLE ID

	GRO (C ₆ -C ₁₀) (mg/kg)	DRO (C ₁₀ -C ₂₈) (mg/kg)	Cl* (mg/kg)
--	--	---	----------------

ANALYSIS DATE	06/15/10	06/15/10	06/15/10
H20104-1 SOURCE @ 8'	<10.0	<10.0	192
Quality Control	477	436	500
True Value QC	500	500	500
% Recovery	95.4	87.2	100
Relative Percent Difference	0.2	0.5	< 0.1

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; Cl: Std. Methods 4500-ClB

*Analysis performed on a 1:4 w:v aqueous extract.

Reported on wet weight.

COPY

Chemist

Date

H20104 TCL RICE

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. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

CARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603
(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: <u>Rice Operating Company</u>		BILL TO		ANALYSIS REQUEST																								
Project Manager: <u>Bruce Baker</u>		P.O. #:		<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="writing-mode: vertical-rl; transform: rotate(180deg);"> <u>TPH 8015</u> </div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);"> <u>LOW</u> </div> </div>																								
Address: <u>122 W. Taylor</u>		Company:																										
City: <u>Hobbs</u> State: <u>NM</u> Zip: <u>88240</u>		Attn:																										
Phone #: <u>575-393-9174</u> Fax #: <u>575-393-1471</u>		Address:																										
Project #:		City:																										
Project Name: <u>EMF Jct 6-13 (20/36)</u>		State: Zip:																										
Project Location:		Phone #:																										
Sampler Name: <u>J. Botts</u>		Fax #:																										
FOR LAB USE ONLY	Lab I.D.	Sample I.D.	(GRAB OR (COMP. # CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE / COOL	OTHER:	DATE	TIME														
	<u>H2D1D4-</u>	<u>Source 13</u>	<u>1</u>			<u>*</u>					<u>*</u>		<u>6/14/10</u>	<u>3:13</u>	<u>*</u>	<u>*</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 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.

Relinquished By: <u>[Signature]</u>	Date: <u>6/14/10</u>	Received By:	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
	Time:		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Relinquished By:	Date: <u>6/14/10</u>	Received By: <u>Jodi Benson</u>	REMARKS: <u>E-Mail Results To:</u>	
	Time: <u>4:23</u>		<u>J Purvis @ RiceSwd.com</u>	
Delivered By: (Circle One)		Sample Condition	<u>Baker</u>	
Sampler - UPS - Bus - Other:		Cool Intact	<u>Regans</u>	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	<u>#sample freshly taken</u>	
		CHECKED BY: <u>[Signature]</u>	<u>& brought to lab.</u>	

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

#26

RICE OPERATING COMPANY

122 West Taylor Hobbs, NM 88240
 PHONE: (575) 393-9174 FAX: (575) 397-1471
 PID METER CALIBRATION & FIELD REPORT FORM

<input type="checkbox"/>	Model: PGM 7300	Serial No: 590-000183	<input type="checkbox"/>	Model: PGM 7600	Serial No: 110-023920
<input type="checkbox"/>	Model: PGM 7300	Serial No: 590-000508	<input type="checkbox"/>	Model: PGM 7600	Serial No: 110-013744
<input type="checkbox"/>	Model: PGM 7300	Serial No: 590-000504	<input checked="" type="checkbox"/>	Model: PGM 7230	Serial No: 592-903318

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: <u>928 547</u>	EXPIRATION DATE: <u>2/04/2013</u>
FILL DATE:	METER READING ACCURACY: <u>100.1</u>

ACCURACY : +/- 2%.

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	G-13	G	13	20	36

SAMPLE ID	PID	SAMPLE ID	PID
Background @ 6"	Ø		
4' @ source	Ø		
5' @ source	Ø		
6' @ source	Ø		
7' @ source	Ø		
8' @ source	Ø		

COPY

I verify that I have calibrated the above instrument in accordance to the manufacture operation manual.

SIGNATURE:

Joe Batt

DATE:

6/14/10

CHLORIDE CONCENTRATION CURVE

RICE Operating Company

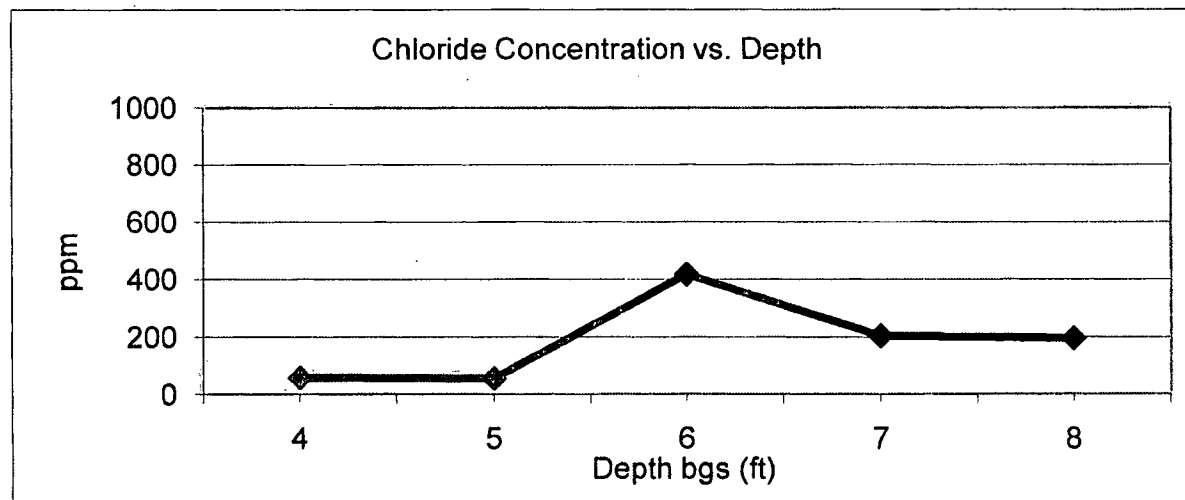
EME Jct. G-13

Unit 'G', Sec. 13, T20S, R36E

Delineation of Source

Depth bgs (ft)	[Cl ⁻] ppm
4	59
5	56
6	418
7	204
8	196

Groundwater = 34 ft





Current Photodocumentation

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

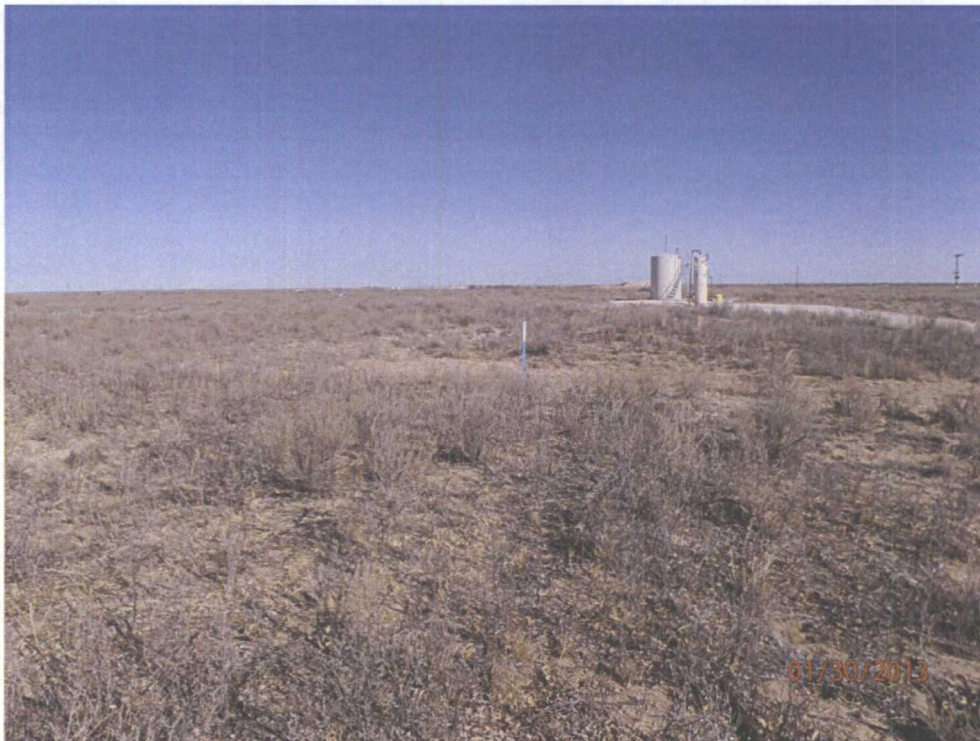
EME Jct. G-13

UL/G, Section 13, T20S,R36E



Facing west

1/30/2013



Facing north

1/30/2013