

1R - 427-127

**APPROVALS**

**YEAR(S):**

2013

**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Wednesday, February 20, 2013 3:25 PM  
**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 (1R427-127) Termination - ROC EME N-6 Site

**RE: Termination Request  
for the Rice Operating Company's  
EME N-6 Site  
Unit Letter N, Section 6, T21S, R36E, NMPM, Lea County, New Mexico  
Remediation Plan (1R427-127) 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 1, 2013 (received February 4, 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 (1R427-127) 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 8807

RECEIVED

February 1, 2013

FEB - 4 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 N-6 (1R427-127): UL/N Sec. 6, T21S, 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 2001, ROC initiated work on the former N-6 junction box. The site is located in UL/N, Sec. 6, T21S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 157 +/- feet. After the former junction box was removed, composite samples were collected from the sidewalls and the bottom of the resulting hole. The composite samples were sent to a commercial for analysis of chloride, TPH and BTEX, resulting in a sidewall chloride concentration of 427 mg/kg, a diesel range organics (DRO) concentration of 256 mg/kg and concentrations of gasoline range organics (GRO) and BTEX below detectable limits. The bottom composite resulted in a chloride concentration of 259 mg/kg, a DRO concentration of 80.6 mg/kg and concentrations of gasoline range organics (GRO) and BTEX below detectable limits. The excavation was backfilled to ground surface and contoured to the surrounding area. This site is located next to a lease road and driving surface; therefore, seeding was not necessary. A new, water-tight junction box was built over the same location.

The junction box site location map, final report, laboratory analysis, disposal manifests 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		
EME	N-6	N	6	21S	36E	LEA	Length 5'	Width 5'	Depth 4'

LAND TYPE: BLM ☐ STATE ☒ FEE LANDOWNER \_\_\_\_\_ OTHER \_\_\_\_\_

Depth to Groundwater 157 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 9-29-01 Date Completed 12-7-00 OCD Witness NONE

Soil Excavated \_\_\_\_\_ cubic yards Excavation Length 5' Width 5' Depth 4' feet

Soil Disposed \_\_\_\_\_ cubic yards Offsite Facility \_\_\_\_\_ Location \_\_\_\_\_

FINAL ANALYTICAL RESULTS: Sample Date 11-20-00 Sample Depth 6'

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 ma/ka	Toluene ma/ka	Ethyl Benzene ma/ka	Total Xylenes ma/ka	GRO ma/ka	DRO ma/ka	Chlorides ma/ka
SIDEWALLS	<0.005	<0.005	<0.005	<0.005	<50	256	427
BOTTOM	<0.005	<0.005	<0.005	<0.005	<50	80.6	259

General Description of Remedial Action: \_\_\_\_\_

A CLEAN BOX THAT DID NOT REQUIRE ANY ADDITION ACTION ON IT.

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS	2'	400
BOTTOM	6'	170

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

DATE FEBRUARY 14, 2001 PRINTED NAME JAMES STURGILL

SIGNATURE *James Sturgill* TITLE ENVIRONMENTAL TECHNICIAN





PHONE (915) 873-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

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

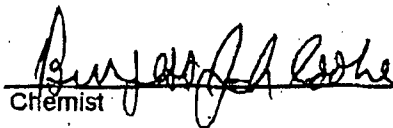
ANALYTICAL RESULTS FOR  
RICE OPERATING CO.  
ATTN: JAMES STURGILL  
122 W. TAYLOR  
HOBBS, NM 88240  
FAX TO:

Receiving Date: 11/14/00  
Reporting Date: 11/16/00  
Project Number: NOT GIVEN  
Project Name: N-6 EME  
Project Location: UN SEC 8-T21S-R36E

Sampling Date: 11/14/00  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: AH  
Analyzed By: BC

LAB NO.	SAMPLE ID	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE		11/15/00	11/15/00	11/15/00	11/15/00
H5342-1	N-6 SIDE EME	<0.005	<0.005	<0.005	<0.015
H5342-2	N-6 BOTTOM EME	<0.005	<0.005	<0.005	<0.015
Quality Control		0.094	0.095	0.087	0.266
True Value QC		0.100	0.100	0.100	0.300
% Recovery		93.8	94.7	87.2	88.6
Relative Percent Difference		1.4	3.8	0.5	2.8

METHOD: EPA SW-848 8260

  
Chemist

11/16/00  
Date

H5342B.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.



# ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

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

ANALYTICAL RESULTS FOR  
RICE OPERATING CO.  
ATTN: JAMES STURGILL  
122 W. TAYLOR  
HOBBS, NM 88240  
FAX TO:

Receiving Date: 11/14/00  
Reporting Date: 11/15/00  
Project Number: NOT GIVEN  
Project Name: N-8 EME  
Project Location: UN-SEC 6-T213-R36E

Sampling Date: 11/14/00  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: AH  
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 <sup>*</sup> (mg/Kg)
ANALYSIS DATE	11/14/00	11/14/00	11/15/00
H5342-1 N-8 SIDE EME	<50	256	427
H5342-2 N-8 BOTTOM EME	<50	80.6	259
Quality Control	787	804	954
True Value QC	800	800	1000
% Recovery	98.3	100	95.4
Relative Percent Difference	7.7	0.9	4.9

METHODS: TPH-GRO & DRO: EPA SW-846 8015 M; Cl<sup>\*</sup> Std. Methods 4500-Cl<sup>\*</sup>B

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

*James Sturgill*  
Chemist

11/15/00  
Date

H5342A.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

(915) 673-7001 Fax (915) 673-7020 (505) 393-2326 Fax (505) 393-2476

## **CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

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

Company Name: <b>BICE OPERATING CO.</b>				<b>BILL TO</b>				<b>ANALYSIS REQUEST</b>																			
Project Manager: <b>JAMES STURGILL</b>				P.O. #:				<div style="writing-mode: vertical-rl; transform: rotate(180deg);">8015, 01, BTEX</div>																			
Address: <b>122 W. TAYLOR</b>				Company:																							
City: <b>HOBBS</b> State: <b>NM</b> Zip: <b>88240</b>				Attn:																							
Phone #: _____ Fax #: _____				Address:																							
Project #: _____ Project Owner:				City:																							
Project Name: <b>N-6 EME</b>				State: _____ Zip: _____																							
Project Location: <b>UN-SEC 6 T215 R36E</b>				Phone #: _____																							
Sampler Name:				Fax #: _____																							
FOR LAB USE ONLY				MATRIX		PRESERV.		SAMPLING																			
Lab I.D.	Sample I.D.	(GRAB OR C/COMP.)	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	CRUDE OIL	SLUDGE	OTHER:	ACID/BASE:	ICE / COOL	OTHER:	DATE	TIME													
<b>H5342</b>	<b>N-6 Side EME</b>		<b>1</b>			<input checked="" type="checkbox"/>							<b>11/14/00</b>		<input checked="" type="checkbox"/>												
<b>-2</b>	<b>N-6 Bottom EME</b>		<b>1</b>			<input checked="" type="checkbox"/>							<b>0</b>		<input checked="" type="checkbox"/>												

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.

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: <b>James Sturgill</b>		Date: <b>11-14-00</b>		Received By:		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No		Add'l Phone #:	
Relinquished By:		Time: <b>1:30</b>		Date: <b>11/14/00</b>		Time: <b>5:10</b>		Received By: (Lab Staff)	
Delivered By: (Circle One)		Sample Condition		CHECKED BY:		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No		Add'l Fax #:	
Sampler - UPS - Bus - Other:		Cool Intact		(Initials)		REMARKS:			
		<input type="checkbox"/> Yes <input type="checkbox"/> No							
		<input type="checkbox"/> No <input type="checkbox"/> No							

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



## Current Photodocumentation

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

EME N-6 (1R427-127)  
Unit Letter N, Section 6, T21S, R36E



Facing North

1/29/2013



Facing East

1/29/2013