

1R - 427-352

**APPROVALS**

**YEAR(S):**

2013

**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Tuesday, February 26, 2013 8:55 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 (1R427-352) Termination - ROC EME Jct I-20 Site

**RE: Termination Request  
for the Rice Operating Company's  
EME Jct I-20 Site  
Unit Letter I, Section 20, T19S, R37E, NMPM, Lea County, New Mexico  
Remediation Plan (1R427-352) 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 (1R427-352) 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 8807

**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. I-20 (1R427-352): UL/I, Sec. 20, 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 2010, ROC initiated work on the former I-20 junction box. The site is located in UL/I, Sec. 20, T19S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 35 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 10x10x12 ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in low concentrations of each. The excavated soil was blended on site and representative composite samples were collected from the excavation walls, bottom and blended backfill, resulting in a 4-wall chloride concentration of 16 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The bottom sample resulted in a chloride concentration of 32 mg/kg, and concentrations of GRO and DRO below detectable limits. The blended backfill sample resulted in a chloride concentration of 32 mg/kg, and concentrations of GRO and DRO below detectable limits. The blended backfill was returned to the excavation and contoured to the surrounding area. On 8/23/2010, 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.

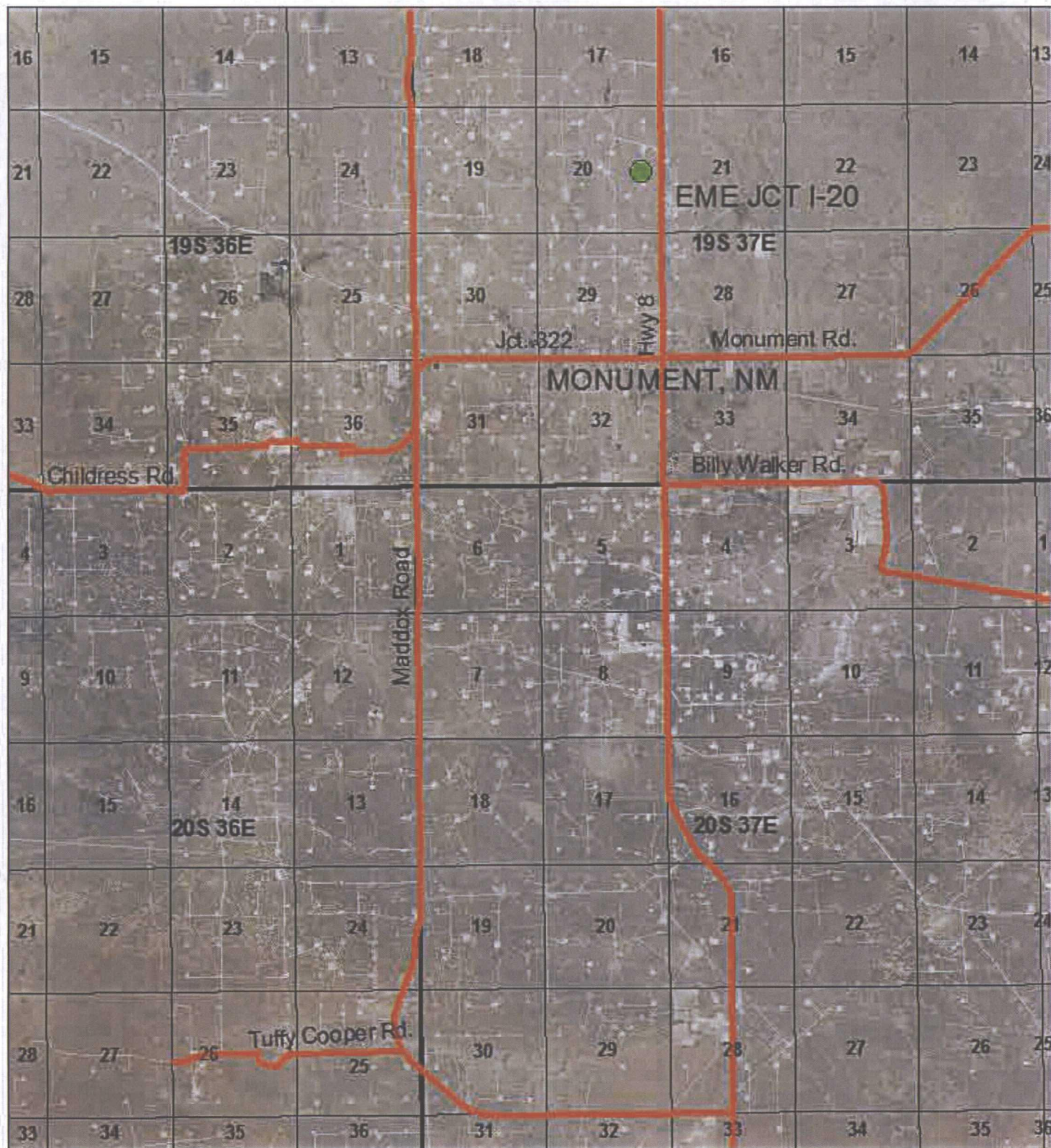
Hack Conder  
Environmental Manager

enclosures



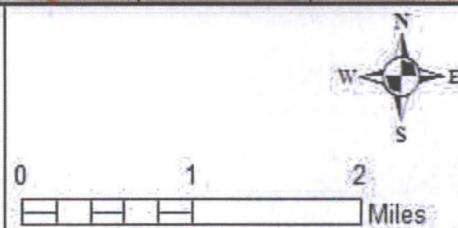
## Site Location Map

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



## EME JCT I-20

UL I SECTION 20  
T-19-S R-37-E  
LEA COUNTY, NM



Drawing date: 1/21/13  
Drafted by: Tony Grieco





# 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		
Euince-Monument-Eumont (EME)	Jct. I-20	I	20	19S	37E	Lea	Length	Width	Depth
							Eliminated		

LAND TYPE: BLM \_\_\_\_\_ STATE X FEE LANDOWNER \_\_\_\_\_ OTHER \_\_\_\_\_

Depth to Groundwater 35 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 6/8/2010 Date Completed 8/23/2010 OCD Witness no

Soil Excavated 44.4 cubic yards Excavation Length 10 Width 10 Depth 12 feet

Soil Disposed 72 cubic yards Offsite Facility C&C Land Farm Location Monument, NM

**FINAL ANALYTICAL RESULTS:** Sample Date 6/24/2010 Sample Depth 12 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.

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
4-WALL COMP.	0.1	<10.0	<10.0	16
BOTTOM COMP.	0.1	<10.0	<10.0	32
BACKFILL COMP.	0.1	<10.0	<10.0	32

**CHLORIDE FIELD TESTS**

LOCATION	DEPTH	mg/kg
4-wall comp.	n/a	57
bottom comp.	12'	58
backfill comp.	n/a	53
Delineation trench at 5' north of former junction box (Source)	2'	59
	4'	56
	6'	56
	8'	55
	10'	60
	12'	54

**General Description of Remedial Action:** This junction and line was 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 10x10x12-ft-deep excavation. Chloride field tests were

performed on each sample which yielded low concentrations. Organic vapors, measured using a PID, yielded low concentrations

of organic vapors. The excavated soil was blended on site and representative composite samples were collected from the excavation

walls, bottom, and blended backfill. The representative composite samples were sent to a commercial laboratory for analysis of TPH

and chloride. Laboratory analysis confirmed low concentrations of chloride and organics were non detected. The excavation was

backfilled with the blended backfill to ground surface and contoured to the surrounding area. On 8/23/2010, the site was seeded with a

blend of native vegetation and is expected to return to a productive capacity at a normal rate.

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

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

SITE SUPERVISOR Joe Gatts SIGNATURE \_\_\_\_\_ n/a 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 3-10-11



## EME JCT. I-20

Unit I, Section 20, T19S, R37E



Digging delineation trench

6/8/2010



Backfilling site

7/29/2010



Seeding site

8/23/2010



Site complete

8/23/2010



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

ANALYTICAL RESULTS FOR  
RICE OPERATING COMPANY  
ATTN: HACK CONDER  
122 W. TAYLOR  
HOBBS, NM 88240

Receiving Date: 06/24/10  
Reporting Date: 06/30/10  
Project Number: NOT GIVEN  
Project Name: NOT GIVEN  
Project Location: EME JCT I-20 19/37

Sampling Date: 06/24/10  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: JH  
Analyzed By: AB/HM/CK

LAB NUMBER SAMPLE ID

GRO DRO  
(C<sub>6</sub>-C<sub>10</sub>) (>C<sub>10</sub>-C<sub>28</sub>) CI\*  
(mg/kg) (mg/kg) (mg/kg)

ANALYSIS DATE	06/29/10	06/29/10	06/28/10
H20211-1 BOTTOM COMP @ 12'	<10.0	<10.0	32
H20211-2 4 WALL COMP	<10.0	<10.0	16
H20211-3 REMEDIATED BACKFILL	<10.0	<10.0	32
Quality Control	503	567	500
True Value QC	500	500	500
% Recovery	101	113	100
Relative Percent Difference	2.6	6.9	< 0.1

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

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

Reported on wet weight.

Chemist

Date

H20211 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

(505) 393-2326 FAX (505) 393-2476

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]

† 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

Check Model Number:


Model: PGM 7300 Serial No: 590-000183  
 Model: PGM 7300 Serial No: 590-000508  
 Model: PGM 7300 Serial No: 590-000504


Model: PGM 7600 Serial No: 110-023920  
 Model: PGM 7600 Serial No: 110-013744  
 Model: PGM 7230 Serial No: 592-903318

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: <u>928547</u>	EXPIRATION DATE: <u>2/04/2013</u>
FILL DATE: <u> </u>	METER READING ACCURACY: <u>100.1</u>

ACCURACY : +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	I-20	I	20	19	37

SAMPLE ID	PID	SAMPLE ID	PID
Bottom Composite @ 12'	0.1		
4 WALL composite	0.1		
Remediated Backfill	0.1		

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

SIGNATURE:

*Jim Satt*

DATE:

6/24/10

## CHLORIDE CONCENTRATION CURVE

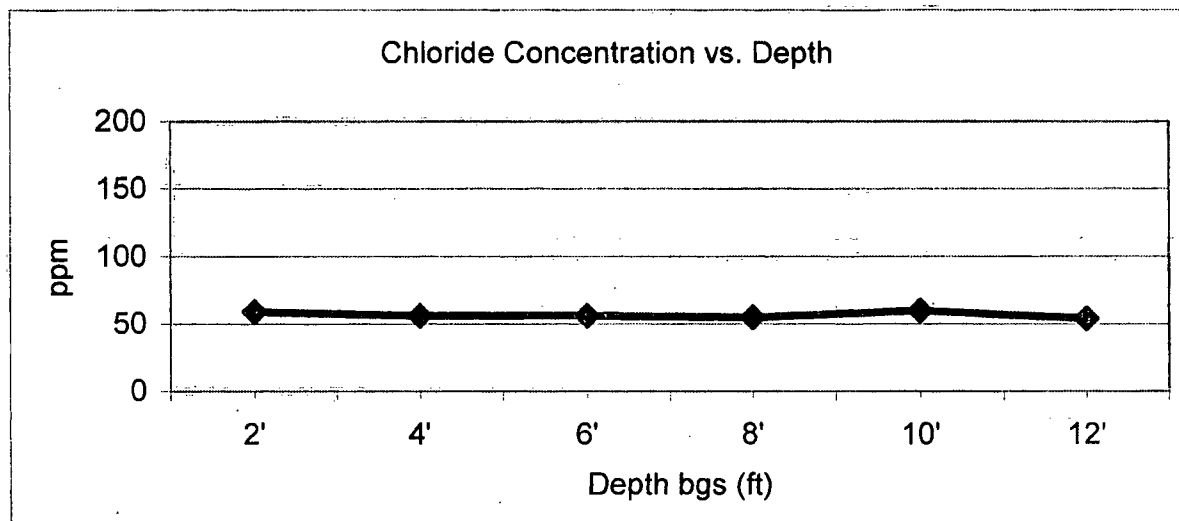
RICE *Operating Company*

### EME Jct. I-20

Unit 'I', Sec. 20, T19S, R37E

*Backhoe samples 5 ft. north of the junction (source)*

Depth bgs. (ft)	[Cl <sup>-</sup> ] ppm
2'	59
4'	56
6'	56
8'	55
10'	60
12'	54



Groundwater = 35 ft



## Current Photodocumentation

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



# EME Jct. I-20

UL/I, Section 20, T19S, R37E



Facing northeast

2/5/2013



Facing southeast

2/5/2013