

1R - 427-327

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, March 11, 2013 1:32 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 (1R427-327) Termination - ROC EME Jct C-17 Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct C-17 Site
Unit Letter C, Section 17, T21S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-327) 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 21, 2013 (received February 26, 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 (1R427-327) 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

RECEIVED OCD
RICE Operating Company
2013 FEB 26 A 10:5
112 West Taylor • Hobbs, New Mexico 88240
Phone: (575) 393-9174 • Fax: (575) 397-1471

CERTIFIED MAIL
RETURN RECEIPT NO. 7007 2560 0000 4569 8869

February 21, 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. C-17 (1R427-327): UL/C, Sec. 17, 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 2010, ROC initiated work on the former C-17 junction box. The site is located in UL/C, Sec. 17, T21S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 178 +/- 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, gasoline range organics (GRO) and diesel range organics (DRO) concentration below detectable limits. The excavated soil was returned to the excavation and contoured to the surrounding area. On 4/7/2010, 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.

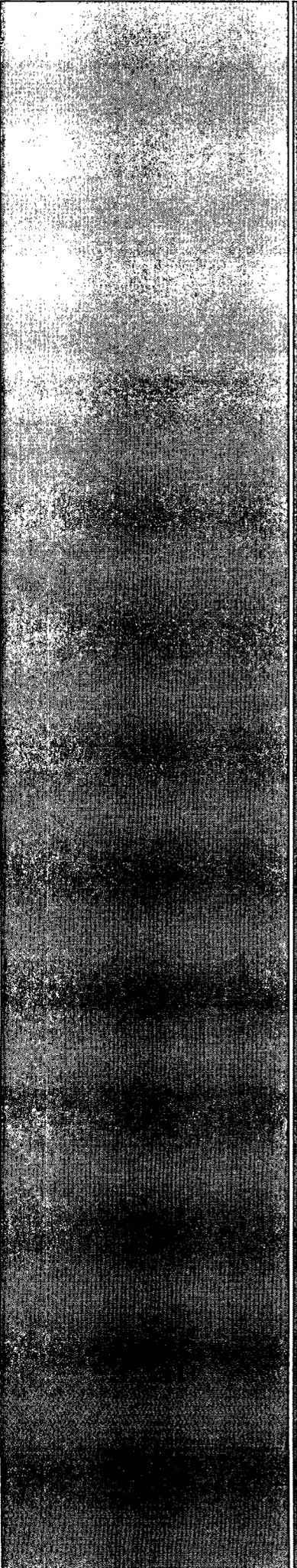
Please contact me at (575)393-9174 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,
RICE Operating Company

A handwritten signature in black ink, appearing to read "H. Conder", with a long horizontal flourish extending to the right.

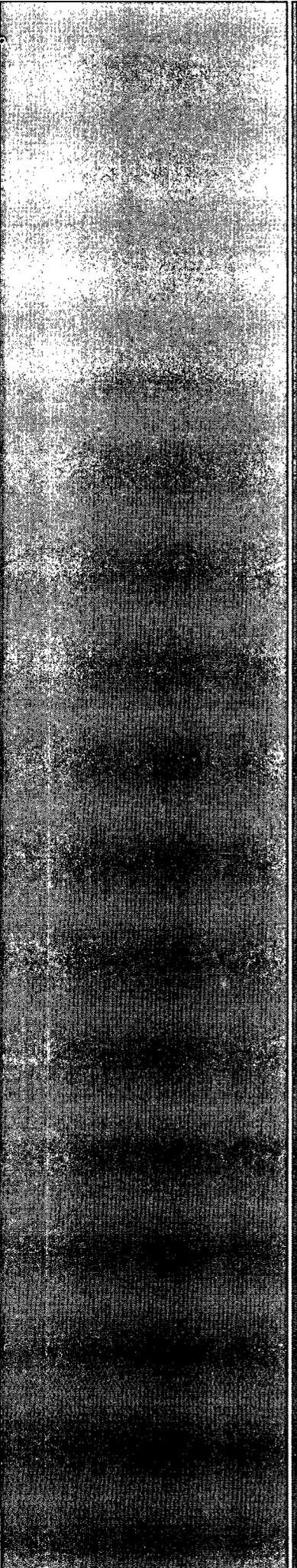
Hack Conder
Environmental Manager

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
Eunice-Monument-Eumont (EME)	Jct. C-17	C	17	21S	36E	Lea	Eliminated		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER Monty Morton OTHER _____

Depth to Groundwater 178 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 3/30/2010 Date Completed 3/30/2010 OCD Witness no

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

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

FINAL ANALYTICAL RESULTS: Sample Date 3/30/2010 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 8" GRAB	3:5	<10.0	<10.0	<16

CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
vertical delineation trench at the junction (source)	background	151
	6"	149
	4'	142
	5'	152
	6'	148
	7'	141

General Description of Remedial Action: This junction box 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 3x5x8-ft-deep excavation. Chloride field tests performed on each sample yielded low concentrations similar to that of the background. Organic vapors were measured using a PID, which also 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. The excavated soil was returned to the excavation to ground surface and contoured to the surrounding area. On 4/07/2010, 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 Jordan Woodfin SIGNATURE *Jordan Woodfin* 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 8-17-10

EME Jct. C-17

Unit C, Section 17, T21S, R36E



Sampling the source facing east 3/30/10



Digging the source facing east 3/30/2010



Final excavation facing east 3/30/10



Seeding site facing west 4/7/2010

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: 590-000509
 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 7600 Serial No: 110-013676

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 924503	EXPIRATION DATE: 7-5-012
FILL DATE: 7-1-09	METER READING ACCURACY: 99.3

ACCURACY: +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	JCT C-17	C	17	215	3LOE

SAMPLE ID	PID	SAMPLE ID/	PID
Source		Background	
4'	3.3	10"	0.1
5'	3.3		
6'	4.0		
7'	4.1		
8'	3.5		

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

SIGNATURE: *Richard Wood*

DATE: 3-30-10

CHLORIDE CONCENTRATION CURVE

RICE Operating Company

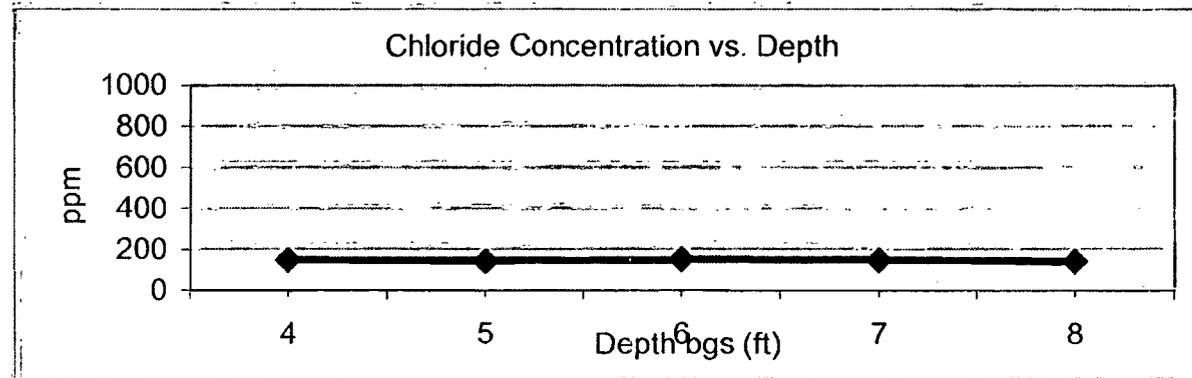
EME Jct. C-17

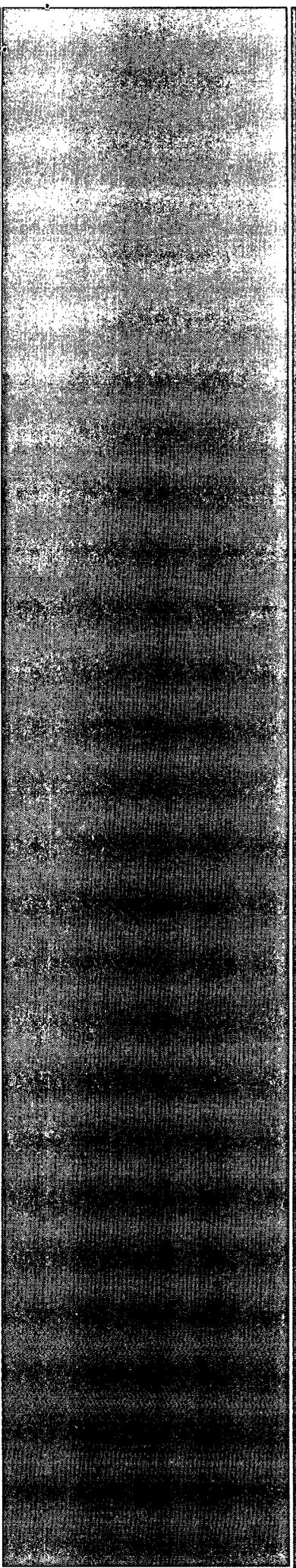
Unit 'C', Sec. 17, T21S, R36E

Backhoe samples at the junction (source)

Depth bgs (ft)	[Cl] ppm
4	149
5	142
6	152
7	148
8	141

Groundwater = 178 ft





Current Photodocumentation

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

EME Jct. C-17
UL/C, Section 17, T21S, R36E



Facing west

2/11/2013



Facing south

2/11/2013