

1R - 427-321

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, March 12, 2013 11:12 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 (1R427-321) Termination - ROC EME Jct N-13 Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct N-13 Site
Unit Letter N, Section 13, T20S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-321) 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 (1R427-321) 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 OCD

FEB 26 A 10: 56

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. N-13 (1R427-321): UL/N, 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 N-13 junction box. The site is located in UL/N, Sec. 13, T20S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 29 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x2x8 ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in low chloride concentrations. The 8 ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 16 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 11/24/2010, 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

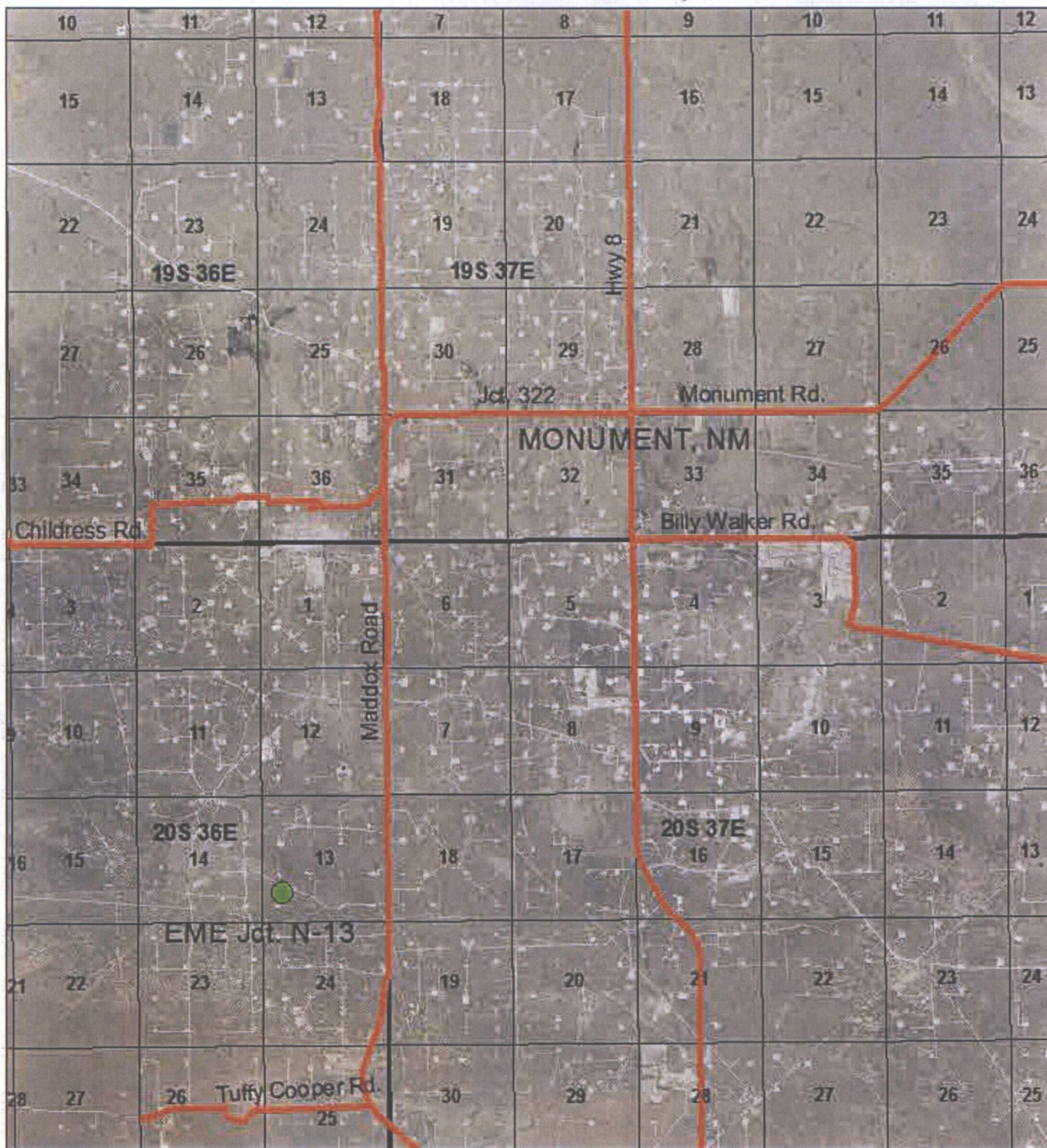
enclosures



Site Location Map

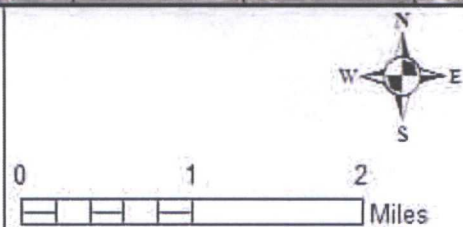
RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471

Site Location Map



**EME Jct. N-13
(1R427-321)**

UL N, SECTION 13,
T-20-S, R-36-E
LEA COUNTY, NM





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. N-13	N	13	20S	36E	Lea	Eliminated		

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

Depth to Groundwater 29 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 11/24/2010 Date Completed 11/24/2010 OCD Witness no

Soil Excavated 3.0 cubic yards Excavation Length 5 Width 2 Depth 8 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 11/24/2010 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	1.7	<10.0	<10.0	16

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
background	6"	58
vertical delineation trench at the junction (source)	4'	177
	5'	85
	6'	114
	7'	90
	8'	116

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 5x2x8-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 11/24/2010, 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 Dak Harris SIGNATURE *Dak Harris* COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Zach Conder INITIAL *ZC*

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE *Larry Bruce Baker Jr.* DATE 2-15-11

EME Jct. N-13

Unit N, Section 13, T20S, R36E



Site prior to delineation

11/23/2010



Collecting sample

11/24/2010



Backfilling site

11/24/2010



Seeding site

11/24/2010

Analytical Results For:

Rice Operating Company
Bruce Baker
112 W. Taylor
Hobbs NM, 88240
Fax To: (575) 397-1471

Received:	11/24/2010	Sampling Date:	11/24/2010
Reported:	11/30/2010	Sampling Type:	Soil
Project Name:	EME JCT N-13 (20/36)	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: SOURCE @ 8' (H021394-01)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	16.0	16.0	11/30/2010	ND	416	104	400	3.77		
TPH 8015M		mg/kg		Analyzed By: AB						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	11/27/2010	ND	160	80.2	200	13.5		
DRO >C10-C28	<10.0	10.0	11/27/2010	ND	151	75.7	200	0.359		

Surrogate: 1-Chlorooctane 103 % 70-130
Surrogate: 1-Chlorooctadecane 111 % 70-130

COPY

Cardinal Laboratories

*=Accredited Analyte

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 the 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.



Celey D. Keene, Lab Director/Quality Manager

RICE OPERATING COMPANY

122 West Taylor Hobbs, NM 88240
 PHONE: (505) 393-9174 FAX: (505) 397-1471
 PID METER CALIBRATION & FIELD REPORT FORM

CK.	✓
MODEL	
NO.	

MODEL: PGM 7300	SERIAL NO: 590-000508
MODEL: PGM 7300	SERIAL NO: 590-000504
MODEL: PGM 7320	SERIAL NO: 592-903318
MODEL: PGM 7300	SERIAL NO: 590-000183

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: <u>930132</u>	EXPIRATION DATE: <u>4/08/13</u>
METER READING ACCURACY: <u>100</u>	

ACCURACY : +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
<u>EME</u>	<u>N-13</u>	<u>N</u>	<u>13</u>	<u>20</u>	<u>36</u>

SAMPLE ID	PID	SAMPLE ID	PID
<u>Background @ 6'</u>	<u>8.2</u>		
<u>4'</u>	<u>8.2</u>		
<u>5'</u>	<u>1.6</u>	COPY	
<u>6'</u>	<u>1.7</u>		
<u>7'</u>	<u>1.5</u>		
<u>8'</u>	<u>1.7</u>		

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

SIGNATURE: Dob Havis

DATE: 11/24/10

CHLORIDE CONCENTRATION CURVE

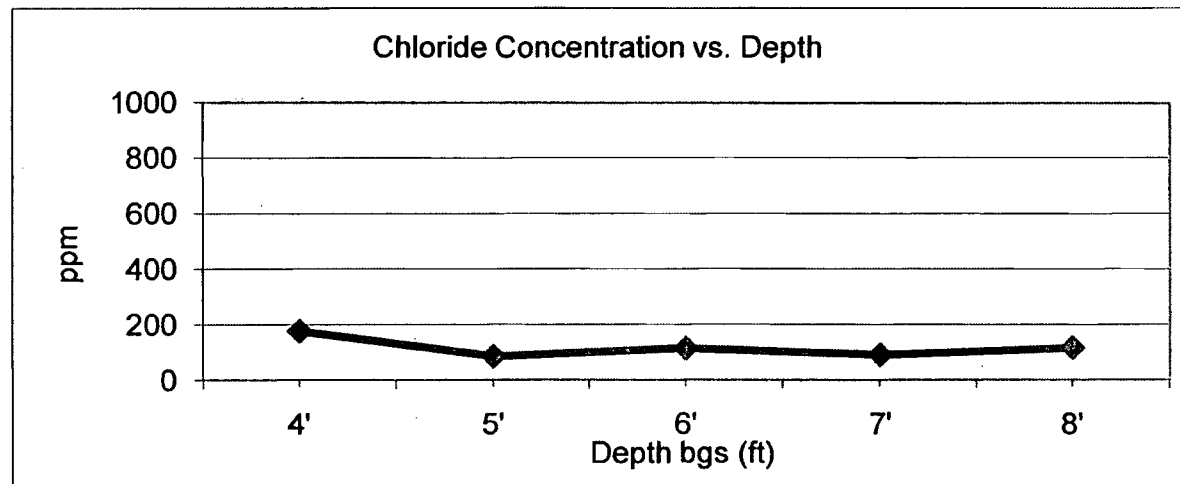
RICE Operating Company

EME Jct. N-13

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

Backhoe samples at the junction (source)

Depth bgs (ft)	[Cl ⁻] ppm
4'	177
5'	85
6'	114
7'	90
8'	116



Groundwater = 29 ft



Current Photodocumentation

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

EME Jct. N-13
UL/N, Section 13, T20S, R36E



Facing south

2/13/2013



Facing east

2/13/2013