1R-427-321

APPROVALS

YEAR(S):

Hansen, Edward J., EMNRD

From:	Hansen, Edward J., EMNRD
Sent:	Tuesday, March 12, 2013 11:12 AM
То:	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)</kjones@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

RECEIVED OCD RICE Operating Company 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. 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

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





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

SWD SYSTEM UNIXT SECTION TOWNSHIP RANGE COUNTY BOX MURENSIONS - FEET Build SWD SYSTEM UNIXT N 13 205 36E Leag Using NURENSIONS - FEET Build SWD SYSTEM Unix N.13 N 13 205 36E Leag Using NURENSIONS - FEET Build SWD SYSTEM Unix N.13 N 13 205 36E Leag OTHER Depth to Groundwater 29 reet NMOCD SITE ASSESSMENT RANKING SCORE: 20 Date Started 1124/2010 Date Completed 1124/2010 OCD Witness no Soil Disposed 0 cubic yerds Excavation Length 5 Widh 2 Depth 8 feet 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. CHLORIDE FIELD TESTS Location mg/mg mg/mg mg/mg Technical 4'd 17/d Source 8' GRAB 1.7 <10.0 10 10/2 10			-			BOX LOCA	ATION				
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PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE Larry Bruce Bacher Ju. DATE 2-15-11			Zach Cond	er	INITIAL	<u>3;C</u>					
	PROJEC	TLEADER	arry Bruce Bal	<u>ker Jr.</u> SIG	NATURE	lany B	ruce Ba	her fi	DATE	2-15	

EME Jct. N-13



Site prior to delineation

11/23/2010



Backfilling site

11/24/2010

Unit N, Section 13, T20S, R36E



Collecting sample

11/24/2010



Seeding site

11/24/2010

CARDINAL Laboratories

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)

	mg/kg			d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	. 8S	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	11/30/2010	ND	416	104	400	3.77	
TPH 8015M	mg	/kg	Analyze	d 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: I-Chlorooctadecane

70-130

111 %



Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Candaha's lacekry and cleart's exclusive remedy for any clearn arsing, whether based in compact or toxt, shall be lamited to the amount pard by deart, for analyses. All clearts, including those for negligence and afty office (dust whitestower shall be beened waved unless made in writing and received by Candinal within thinky (30) cays after completion of the applicable service. In no event shall be larde for incidental or consenuential damages, including, writing inflation, business interruptions, hots of use or loss of profile above attractions or statestower shall be advected by Candinal, within thinky (30) cays after completion of the applicable service. In no event shall cardinal be lade for incidental or consenuential damages, including, writing inflation, business interruptions, hots of use or loss of profile nouries by cleant, its subsidiants, ethilates or successors and of or related to the performance of the services network of the service in the service and the service in the service and the service in the service in the service in the service in the service of the service in the service in the service and the service in the se

Celey. ma

Celey D. Keene, Lab Director/Quality Manager

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ARDINAL LABORATORIES 101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603

183

) 393-2326 FAX (505) 393-24																					
Company Name: 🎢	ice Operating (20,1-	' pa	кŗ			BILL TO					ANALYSIS REQUEST										
Project Manager: 🦉	ruce Baker						P.0	. #:														
Address: 1.2.2 G	U. Taylor						Coi	npan	iy;													
city: HUBbs	State: MM 393-9174 Fax#: 575	Zip:	89	824	¢0		Atti	1:			·											
Phone #: 575 - 3	393-9174 Fax #: 575	-30	77-	14	71		Add	tress	s:			1							1			1
Project #:	Project Owne	r:					CIL	:											1			
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† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

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RICE OPERATING COMPANY

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



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: 430132	EXPIRATION DATE: $4/38/13$
METER READIN	IG ACCURACY: 100

ACCURACY : +/- 2%

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

SAMPLE ID	PID	SAMPLE ID	PID
Background @ 6'	8.2		
4	8.2		
5	1.6	RADW	
61	117		
<i>i</i> 7'	1.5		
8'	1.7		
		· · · · · · · · · · · · · · · · · · ·	
· · · · · · · · · · · · · · · · · · ·	<u> </u>		

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

SIGNATURE:

DATE: 11/24/10

CHLORIDE CONCENTRATION CURVE

RICE Operating Company

EME Jct. N-13

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

4'

5'

6'

7'

8'

Backhoe samples at the junction (source)





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