

1R - 427-55

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, March 28, 2013 4:12 PM
To: Hack Conder (hconder@riceswd.com)
Cc: Leking, Geoffrey R, EMNRD; Laura Pena (lpna@riceswd.com); Katie Jones <kjones@riceswd.com> (kjones@riceswd.com); Scott Curtis (scurtis@riceswd.com)
Subject: Remediation Plan (1R427-55) Termination - ROC EME Trio Persons Site

**RE: Termination Request
for the Rice Operating Company's
EME Trio Persons Site
Unit Letter I, Section 27, T19S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-55) 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 March 18, 2013 (received March 21, 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 (1R427-55) 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

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 9293

RECEIVED

March 18, 2013

MAR 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

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

RE: Termination Request
EME Trio Persons (1R427-55): UL/I, Sec. 27, T19S, 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 2002, ROC initiated work on the former Trio Persons junction box. The site is located in UL/I, Sec. 27, T19S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 50 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 28x25x6 ft deep excavation. Each sample was field titrated for chlorides, resulting in chloride concentrations that related with depth. Representative samples were collected from the excavation walls and excavation bottom and sent to a commercial laboratory for analysis. The sidewall sample resulted in a chloride concentration of 168 mg/kg, a gasoline range organics (GRO) concentration below detectable limits and a diesel range organics (DRO) of 12 mg/kg. The bottom composite sample resulted in a chloride concentration of 532 mg/kg and concentrations of GRO and DRO below detectable limits. Both samples were also analyzed for BTEX, resulting in concentrations below detectable limits throughout. A total of 140 cubic yards of excavated soil was properly disposed of at a NMOCD facility. A compacted clay liner was installed and the excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area. Since the site is located next to a lease road, seeding is not required. A new, watertight junction was installed at the site.

The junction box site location map, final report, laboratory analysis, disposal manifest 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, flowing script.

Hack Conder
Environmental Manager

enclosures

RECEIVED OCD
2013 MAR 21 P 2:17



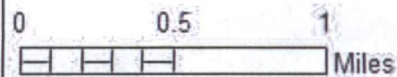
Site Location Map

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



EME Trio Persons (1R427-55)

Unit Letter I, Section 27,
T19S, R36E
Lea County, NM



Drawing date: 3/11/2013



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	Trio Persons	I	27	19S	36E	LEA	Length 10	Width 12	Depth 5

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER JIMMIE T COOPER OTHER _____

Depth to Groundwater <50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 1/30/2002 Date Completed 2/1/2002 OCD Witness NO

Soil Excavated 150 cubic yards Excavation Length 28 Width 25 Depth 6 feet

Soil Disposed 140 cubic yards Offsite Facility C&C LANDFARM Location MONUMENT, NM

FINAL ANALYTICAL RESULTS: Sample Date 2/1/2002 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 mg/kg	Toluene mg/kg	Ethyl Benzene mg/kg	Total Xylenes mg/kg	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SIDEWALLS	<0.025	<0.025	<0.025	<0.025	<10	12	168
BOTTOM	<0.025	<0.025	<0.025	<0.025	<10	<10	532

General Description of Remedial Action: Delineated vertical extent to 11' bgs. TPH

was clean at 6' bgs. This decline indicates the impact probably stopped before reaching

groundwater. The site was delineated laterally to below NMOCD TPH guidelines.

A compacted clay barrier to vertical transmissivity was installed. A water tight junction

box was installed and backfilled with fresh soil. The high impacted soil was hauled to a permitted

disposal facility. Natural attenuation will remediate the remaining hydrocarbon.

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS	5'	250
BOTTOM	6'	350
Vertical Extent	3'	900
	5'	900
	7'	500
	9'	400
	11'	200

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

DATE February 11, 2002

PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson*

TITLE Project Leader - Environmental

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

RE ENVIRONMENTAL
ATTN: DEREK ROBINSON
P.O. BOX 13418
ODESSA, TEXAS 79768-3418
FAX: 366-0804
FAX: 505-397-1471 (Donnie Anderson)

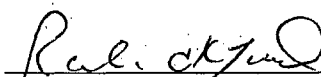
Sample Type: Soil
Sample Condition: Intact/ Iced/ 0.0 deg C
Project Name: Trio Persons Battery
Project #: None Given
Project Location: Rice Operating

Sampling Date: 02/01/02
Receiving Date: 02/04/02
Analysis Date: 02/04/02

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
0202533-01	5pt Composite Bottom @ 6'	<0.025	<0.025	<0.025	<0.025	<0.025
0202533-02	4pt Wall Comp. @ 5'	<0.025	<0.025	<0.025	<0.025	<0.025

QUALITY CONTROL	0.113	0.110	0.099	0.210	0.095
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% IA	113	110	99	105	95
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	<0.025	<0.025	<0.025	<0.025	<0.025
SPIKE	0.113	0.114	0.110	0.221	0.103
SPIKE DUP	0.110	0.109	0.102	0.216	0.097
%EA	110	109	102	108	97
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025
RPD	2.69	4.48	7.55	2.29	6.00

METHODS: EPA SW 846-8021B, 5030


Celey D. Keene
Randall K. Tuttle

2-05-02
Date

ENVIRONMENTAL LAB OF , Inc.

"Don't Treat Your Soil Like Dirt!"

RE ENVIRONMENTAL
ATTN: DEREK ROBINSON
P.O. BOX 13418
ODESSA, TEXAS 79768-3418
FAX: 366-0804
FAX: 505-397-1471 (Donnie Anderson)

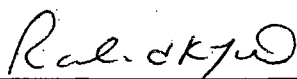
Sample Type: Soil
Sample Condition: Intact/ Iced/ 0.0 deg C
Project Name: Trlo Persons Battery
Project #: None Given
Project Location: Rice Operating

Sampling Date: 02/01/02
Receiving Date: 02/04/02
Analysis Date: 02/04/02

ELT#	FIELD CODE	Chloride mg/kg
0202533-01	5pt Composite Bottom @ 6'	532
0202533-02	4pt Wall Comp. @ 5'	168

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	500
ORIGINAL SAMPLE	18
SPIKE	523
SPIKE DUP	523
% EXTRACTION ACCURACY	101
BLANK	<5.00
RPD	0.0

METHODS: EPA SW 846-9253



Celey D. Keene
Raland K. Tuttle

2-05-02
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

RE ENVIRONMENTAL
ATTN: DEREK ROBINSON
P.O. BOX 13418
ODESSA, TEXAS 79768-3418
FAX: 366-0804
FAX: 505-397-1471 (Donnie Anderson)

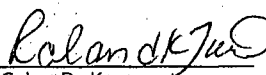
Sample Type: Soil
Sample Condition: Intact/ Iced/ 0.0 deg C
Project Name: Trio Persons Battery
Project #: None Given
Project Location: Rice Operating

Sampling Date: 02/01/02
Receiving Date: 02/04/02
Analysis Date: 02/04/02

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg
0202533-01	5pt Composite Bottom @ 6'	<10	12
0202533-02	4pt Wall Comp. @ 5'	<10	<10

QUALITY CONTROL	563	540
TRUE VALUE	500	500
% INSTRUMENT ACCURACY	113	108
SPIKED AMOUNT	476	476
ORIGINAL SAMPLE	<10	30
SPIKE	552	599
SPIKE DUP	529	594
% EXTRACTION ACCURACY	111	118
BLANK	<10	<10
RPD	4.26	0.84

Methods: SW 846-8015M


Celey D. Keene
Raland K. Tuttle

2-05-02
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

RE ENVIRONMENTAL
ATTN: Logan Anderson
P.O. BOX 13418
ODESSA, TEXAS 79768-3418
FAX: 366-0804
FAX: 505-397-1471 (Donnie Anderson)

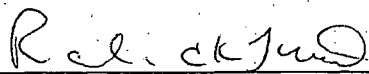
Sample Type: Soil
Sample Condition: Intact/ 15.0 deg. C
Project Name: Rice Operating
Project #: None Given
Project Location: Pearsons Battery - *TRIO PERSONS*

Sampling Date: 01/30/02
Receiving Date: 01/31/02
Analysis Date: 01/31/02

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
0202515-01	TPA @ 11'	<0.025	<0.025	<0.025	<0.025	<0.025

QUALITY CONTROL	0.113	0.110	0.098	0.208	0.093
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% IA	113	110	98	104	93
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	<0.025	<0.025	<0.025	<0.025	<0.025
SPIKE	0.110	0.110	0.104	0.220	0.100
SPIKE DUP	0.114	0.114	0.107	0.227	0.102
%EA	110	110	104	110	100
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025
RPD	3.57	3.57	2.84	3.57	1.98

METHODS: EPA SW 846-8021B ,5030



Celey D. Keene
Randal K. Tuttle

2-01-02
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

RE ENVIRONMENTAL
ATTN: LOGAN ANDERSON
P.O. BOX 13418
ODESSA, TEXAS 79768-3418
FAX: 366-0804
FAX: 505-397-1471 (Donnie Anderson)

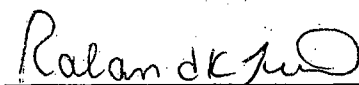
Sample Type: Soil
Sample Condition: Intact/ 15.0 deg C
Project Name: Rice Operating
Project #: None Given
Project Location: Pearson Battery

Sampling Date: 01/30/02
Receiving Date: 01/31/02
Analysis Date: 01/31/02

ELT#	FIELD CODE	Chloride mg/kg
0202515-01	TPA @ 11'	142

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	500
ORIGINAL SAMPLE	142
SPIKE	647
SPIKE DUP	638
% EXTRACTION ACCURACY	101
BLANK	<5.00
RPD	1.40

METHODS: EPA SW 846-9253



Celey D. Keene
Raland K. Tuttle

2-01-02
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

RE ENVIRONMENTAL
ATTN: LOGAN ANDERSON
P.O. BOX 13418
ODESSA, TEXAS 79768-3418
FAX: 366-0804
FAX: 505-397-1471 (Donnie Anderson)

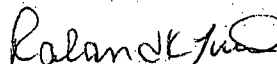
Sample Type: Soil
Sample Condition: Intact/ 15.0 deg C
Project Name: Rice Operating
Project #: None Given
Project Location: Pearson Battery

Sampling Date: 01/30/02
Receiving Date: 01/31/02
Analysis Date: 01/31/02

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg
0202515-01	TPA @ 11'	<10	299

QUALITY CONTROL	557	602
TRUE VALUE	500	500
% INSTRUMENT ACCURACY	111	120
SPIKED AMOUNT	476	476
ORIGINAL SAMPLE	<10	299
SPIKE	621	818
SPIKE DUP	680	830
% EXTRACTION ACCURACY	130	109
BLANK	<10	<10
RPD	9.07	1.46

Methods: SW 846-8015M


Celey D. Keene
Raland K. Tuttle

2-01-02
Date

12600 West I-20 East
Odessa, Texas 79763

Fax: 915-563-1713

CHAIN OF CUSTODY RECORD

Project Manager:

Logan Anderson

Project Name:

Company Name

PE Environmental

Project #:

Company Address:

Project Loc:

City/State/Zip:

PO #:

Telephone No:

Fax No:

Sampler Signature:

Her

[illegible]

C & C LANDFARM, INC.

BOX 55

MONUMENT, NEW MEXICO 88265

PHONE: (505) 397-2045

(505) 397-2860

(505) 392-2236

001815

COMPANY NAME

Rice Oper. Co.

COMPANY REPRESENTATIVE NAME

Dannie Anderson

LEASE NAME

Iron Persons

SEC.

TOWNSHIP

RANGE

27

19S

36E

TRUCKING COMPANY NAME

R.E. Evans

DRIVERS SIGNATURE

Paul Robinson

TYPE OF MATERIAL BEING HAULED AND QUANTITY

145 yds

COPY OF ANALYSIS ATTACHED, IF REQUIRED

Less than 10,000

TPHC

None Found

BENZENE

TOLUENE

ETHYL BENZENE

PARA XYLENE

ATTENDANT ON DUTY

Don Cooper

DATE

2-1-002



Current Photodocumentation

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

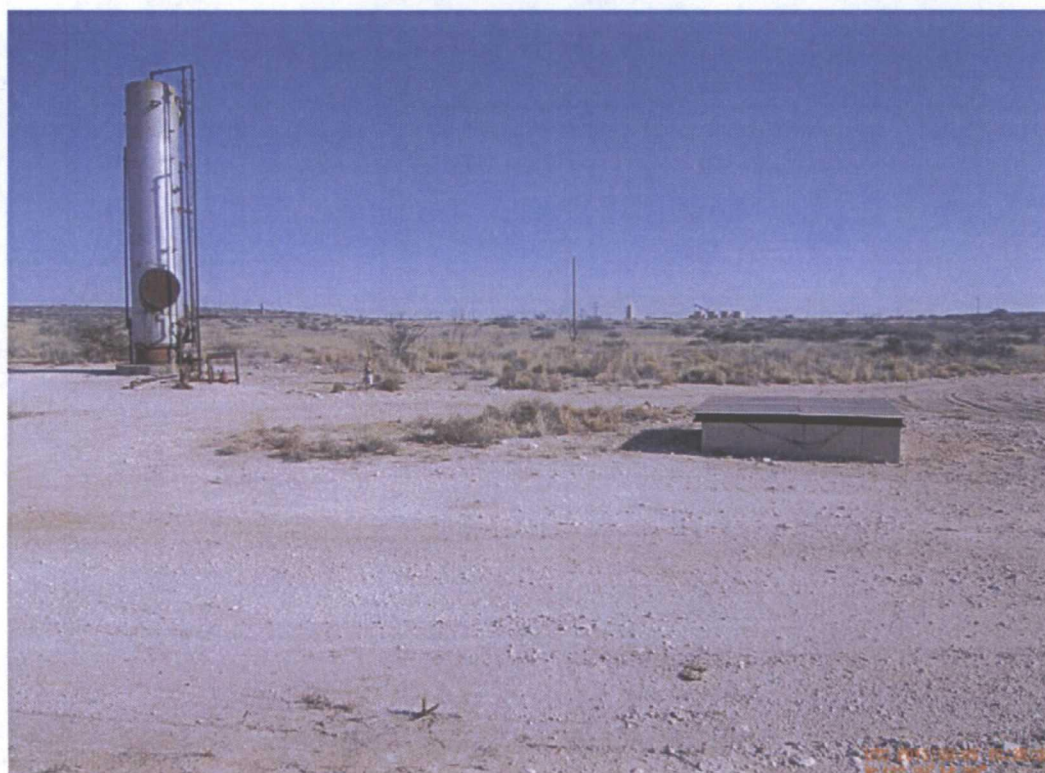
EME Trio Persons

UL/I, Section 27, T19S, R36E



Facing east

3/5/2013



Facing north

3/5/2013