

1R - 427-98

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, March 28, 2013 5:54 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 (1R427-98) Termination - ROC EME P-1 Site

**RE: Termination Request
for the Rice Operating Company's
EME P-1 Site
Unit Letter P, Section 1, T21S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-98) 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 (1R427-98) 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 P-1 (1R427-98): UL/P, Sec. 1, T21S, R35E
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 2001, ROC initiated work on the former P-1 junction box. The site is located in UL/P, Sec. 1, T21S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 100 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 13x8x10 ft deep excavation. Each sample was field titrated for chlorides, resulting in slightly elevated chloride concentrations. 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 336 mg/kg, a gasoline range organics (GRO) concentration below detectable limits and a diesel range organics (DRO) of 2,080 mg/kg. The bottom composite sample resulted in a chloride concentration of 528 mg/kg, a gasoline range organics (GRO) concentration below detectable limits and a diesel range organics (DRO) of 1,000 mg/kg. Both samples were also analyzed for BTEX, resulting in concentrations below detectable limits throughout. A total of 60 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 flourish at the end.

Hack Conder
Environmental Manager

enclosures

RECEIVED OCD
2013 MAR 21 P 2:11

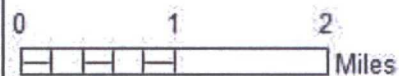


Site Location Map

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



Unit Letter P, Section 1
T21S, R35E
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	P-1	P	1	21S	35E	LEA	Length 10	Width 4	Depth 6

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

Depth to Groundwater >100 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 10/24/2001 Date Completed 10/30/2001 OCD Witness NO

Soil Excavated 60 cubic yards Excavation Length 13 Width 8 Depth 10 feet

Soil Disposed 60 cubic yards Offsite Facility South Monument Location Monument, NM

FINAL ANALYTICAL RESULTS: Sample Date 10/30/2001 Sample Depth 10'

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	< 0.005	< 0.005	< 0.005	<0.015	<50	2080	336
BOTTOM	< 0.005	< 0.005	< 0.005	<0.015	<50	1000	528

General Description of Remedial Action: Initial closure testing demonstrated impact

levels below NMOCD guidelines. Installed a compacted clay barrier and water proof junction box.

Backfilled with fresh soil. Natural attenuation will remediate the remaining hydrocarbon.

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS	8'	275
BOTTOM	10'	450

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

DATE November 29, 2001 PRINTED NAME D. E. Anderson

SIGNATURE  TITLE Project Leader - Environmental



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
RICE OPERATING CO.
ATTN: CHRIS RODRIGUEZ
122 W. TAYLOR
HOBBS, NM 88240
FAX TO: (505) 397-1471

Receiving Date: 10/26/01
Reporting Date: 10/30/01
Project Number: P-1 BOX UPGRADE
Project Name: P-1 FINAL SAMPLES (COMPOSITE)
Project Location: EME

Sampling Date: 10/26/01
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

LAB NO.	SAMPLE ID	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE		10/26/01	10/26/01	10/26/01	10/26/01
H6245-1	WALL COMP. 10' BGS	<0.005	<0.005	<0.005	<0.015
H6245-2	BOTTOM COMP. 10' BGS	<0.005	<0.005	<0.005	<0.015
Quality Control		0.098	0.089	0.097	0.291
True Value QC		0.100	0.100	0.100	0.300
% Recovery		98.2	88.7	96.6	96.9
Relative Percent Difference		1.3	0.9	1.8	0.8

METHOD: EPA SW-846.8260

Chemist

Date

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 any other party 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.

H6245B.XLS



CHAIN-OF-CUSTODY AND A

† Cardinal cannot accept verbal changes. Please fax written changes to 915-673-7020.

1. Clean

SOUTH MONUMENT SURFACE WASTE FACILITY

TICKET# 4518

LEASE OPERATOR:

RICE OPERATING
122 W. TAYLOR
HOBBS, NM 88240
ATTN: CHRIS RODRIGUEZ

ORIGINATING LOCATION:

SE 1/4 T21S-R35E
Jct. P-1

TRANSPORTER NAME & ADDRESS:

DIRT WORKS

DESCRIPTION OF WASTE:

NON-HAZARDOUS HYDROCARBONS

QUANTITY:

12 YDS.

FACILITY CONTACT:

Ray B. Larson
SIGNATURE OF CONTACT

10-26-01
DATE

CELL NUMBER MATERIAL PLACED IN:

B-1

SIGNATURE OF TRANSPORTER (DRIVER):

[Signature]
SIGNATURE OF DRIVER

10-26-01
DATE

DISPOSAL SITE

SOUTH MONUMENT SURFACE WASTE FACILITY
P.O. BOX 418
HOBBS, NM 88241-0418
S25 T20S R36E N/2 NE/4

"As a condition of acceptance for disposal, I hereby certify that this waste is an exempt waste as defined by the Environmental Protection Agency (EPA). The waste are: generated from oil and gas exploration and production operations, exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C Regulations; and not mixed with non-exempt waste."

[Signature]
FACILITY REPRESENTATIVE

10/26/01
DATE

Clean

SOUTH MONUMENT SURFACE WASTE FACILITY

TICKET# 4516

LEASE OPERATOR:

RICE OPERATING
122 W. TAYLOR
HOBBS, NM 88240
ATTN: CHRIS RODRIGUEZ

ORIGINATING LOCATION:

Sec 1 T21S R35E
Jct P-1

TRANSPORTER NAME & ADDRESS:

DIRT WORKS

DESCRIPTION OF WASTE:

NON-HAZARDOUS HYDROCARBONS

QUANTITY:

12 yds YDS.

FACILITY CONTACT:

Ramon Hernandez
SIGNATURE OF CONTACT

10-25-01
DATE

CELL NUMBER MATERIAL PLACED IN:

B-1

SIGNATURE OF TRANSPORTER (DRIVER):

Manuel Perez
SIGNATURE OF DRIVER

10-25-01
DATE

DISPOSAL SITE

SOUTH MONUMENT SURFACE WASTE FACILITY
P.O. BOX 418
HOBBS, NM 88241-0418
S25 T20S R36E N/2 NE/4

"As a condition of acceptance for disposal, I hereby certify that this waste is an exempt waste as defined by the Environmental Protection Agency (EPA). The waste are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C Regulations; and not mixed with non-exempt waste."

Lera Lay Cooper
FACILITY REPRESENTATIVE

10/25/01
DATE

1. Clean

SOUTH MONUMENT SURFACE WASTE FACILITY

TICKET# 4517

LEASE OPERATOR:

RICE OPERATING
122 W. TAYLOR
HOBBS, NM 88240
ATTN: CHRIS RODRIGUEZ

ORIGINATING LOCATION:

SEC 1 T21S R35E
JCT P-1

TRANSPORTER NAME & ADDRESS:

DIRT WORKS

DESCRIPTION OF WASTE:

NON-HAZARDOUS HYDROCARBONS

QUANTITY:

12 yds YDS.

FACILITY CONTACT:

Ray B. Rascon
SIGNATURE OF CONTACT

DATE

CELL NUMBER MATERIAL PLACED IN:

 B-1

SIGNATURE OF TRANSPORTER (DRIVER):

Manuel Ben
SIGNATURE OF DRIVER

10-25-01
DATE

DISPOSAL SITE

SOUTH MONUMENT SURFACE WASTE FACILITY
P.O. BOX 418
HOBBS, NM 88241-0418
S25 T20S R36E N/2 NE/4

"As a condition of acceptance for disposal, I hereby certify that this waste is an exempt waste as defined by the Environmental Protection Agency (EPA). The waste are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C Regulations; and not mixed with non-exempt waste."

Lone Kay Cooper
FACILITY REPRESENTATIVE

10/25/01
DATE

Clean

SOUTH MONUMENT SURFACE WASTE FACILITY

TICKET# 4514

LEASE OPERATOR:

RICE OPERATING
122 W. TAYLOR
HOBBS, NM 88240
ATTN: CHRIS RODRIGUEZ

ORIGINATING LOCATION:

Sec 1 T21S R35E
Jct R1

TRANSPORTER NAME & ADDRESS:

DIRT WORKS

DESCRIPTION OF WASTE:

NON-HAZARDOUS HYDROCARBONS

QUANTITY:

12 YDS.

FACILITY CONTACT:

Ramon Hernandez
SIGNATURE OF CONTACT

10-25-01
DATE

CELL NUMBER MATERIAL PLACED IN:

B-1

SIGNATURE OF TRANSPORTER (DRIVER):

[Signature]
SIGNATURE OF DRIVER

10-25-01
DATE

DISPOSAL SITE

SOUTH MONUMENT SURFACE WASTE FACILITY
P.O. BOX 418
HOBBS, NM 88241-0418
S25 T20S R36E N/2 NE/4

"As a condition of acceptance for disposal, I hereby certify that this waste is an exempt waste as defined by the Environmental Protection Agency (EPA). The waste are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C Regulations; and not mixed with non-exempt waste."

Rene Kay Cooper
FACILITY REPRESENTATIVE

10/25/01
DATE

Clean

SOUTH MONUMENT SURFACE WASTE FACILITY

TICKET#

4515

LEASE OPERATOR:

RICE OPERATING
122 W. TAYLOR
HOBBS, NM 88240
ATTN: CHRIS RODRIGUEZ

ORIGINATING LOCATION:

Sec 1 T21S R35E
JCT P-1

TRANSPORTER NAME & ADDRESS:

DIRT WORKS

DESCRIPTION OF WASTE:

NON-HAZARDOUS HYDROCARBONS

QUANTITY:

12 YDS.

FACILITY CONTACT:

Ramon Hernandez
SIGNATURE OF CONTACT

10-25-01
DATE

CELL NUMBER MATERIAL PLACED IN:

B-1

SIGNATURE OF TRANSPORTER (DRIVER):

[Signature]
SIGNATURE OF DRIVER

10-25-01
DATE

DISPOSAL SITE

SOUTH MONUMENT SURFACE WASTE FACILITY
P.O. BOX 418
HOBBS, NM 88241-0418
S25 T20S R36E N/2 NE/4

"As a condition of acceptance for disposal, I hereby certify that this waste is an exempt waste as defined by the Environmental Protection Agency (EPA). The waste are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C Regulations; and not mixed with non-exempt waste."

[Signature]
FACILITY REPRESENTATIVE

10/25/01
DATE



Current Photodocumentation

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

EME P-1

UL/P, Section 1, T21S,R35E



Facing north

3/5/2013



Facing south

3/5/2013