

1R - 427-355

**APPROVALS**

**YEAR(S):**

2013

**Hansen, Edward J., EMNRD**

---

**From:** Hansen, Edward J., EMNRD  
**Sent:** Tuesday, April 09, 2013 2:27 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 (1R427-355) Termination - ROC EME A-16 EOL Site

**RE: Termination Request  
for the Rice Operating Company's  
EME A-16 EOL Site  
Unit Letter A, Section 16, T212S, R36E, NMPM, Lea County, New Mexico  
Remediation Plan (1R427-355) 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 27, 2013 (received April 1, 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 (1R427-355) 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

2013 APR -1 P 2:00

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 9316

**March 27, 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 A-16 EOL (1R427-355): UL/A, Sec. 16, 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 A-16 EOL junction box. The site is located in UL/A, Sec. 16, T21S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 195 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x3x12 ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in low concentrations of each. The 12 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. A total of 12 cubic yards of excavated soil was properly disposed of at a NMOCD facility. The excavated soil was returned to the excavation and contoured to the surrounding area. On September 27, 2010, the site was seeded with a blend of native vegetation. A junction box is no longer needed at the site. The site is adjacent to an active battery lease pad and reseeded of the site is not necessary.

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 stylized flourish at the end.

Hack Conder  
Environmental Manager

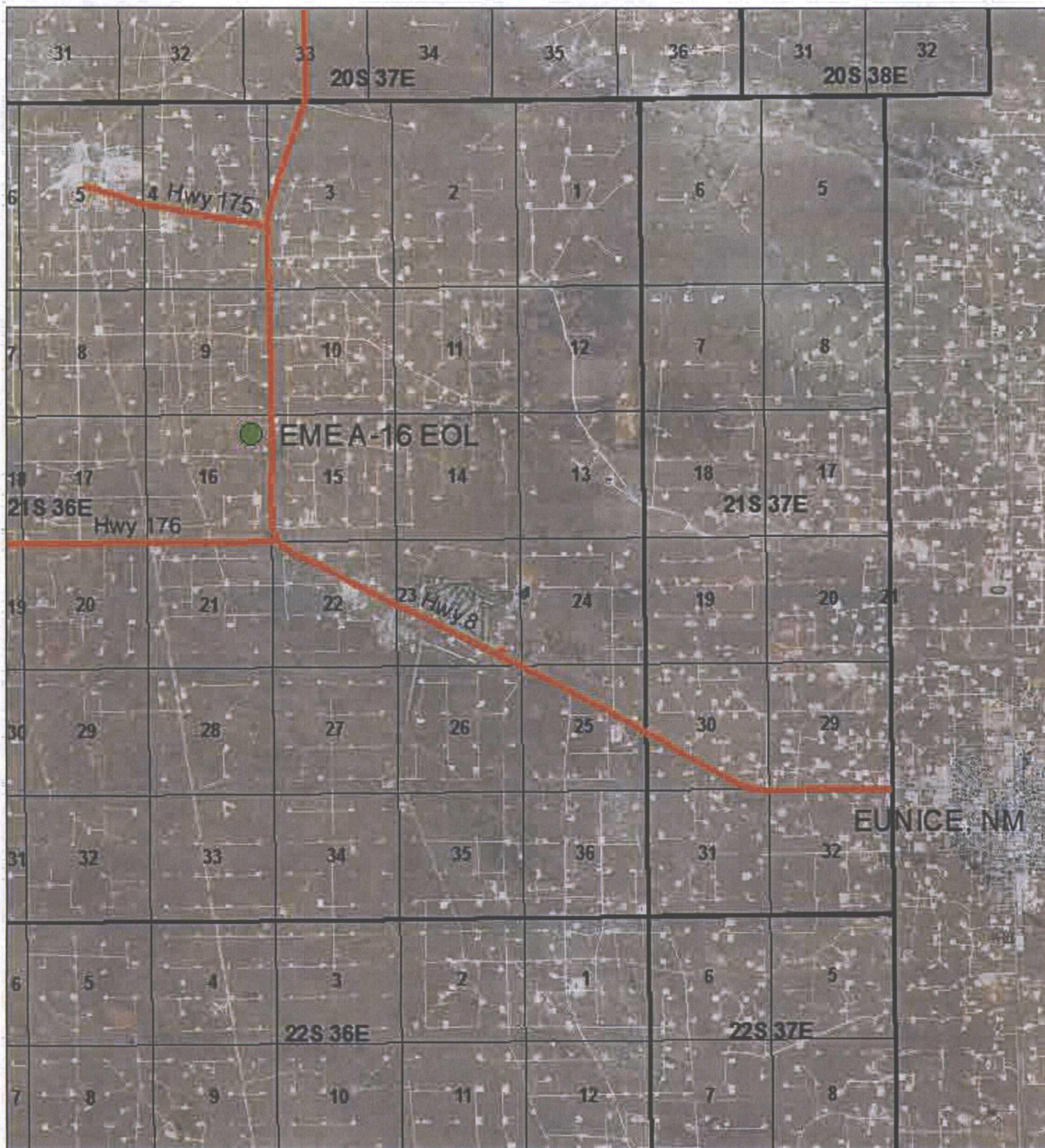
enclosures



## Site Location Map

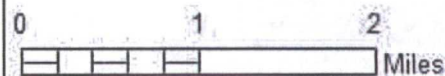
**RICE *Operating Company* (ROC)**  
112 West Taylor Hobbs, NM 88240  
Phone: (575) 393-9174 Fax: (575) 397-1471





## EME A-16 EOL

UL A SECTION 16  
T-21-S R-36-E  
LEA COUNTY, NM



Drawing date: 1/21/13  
Drafted by: Tony Grieco

# 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 |       |       |
|---------------------------------|----------|------|---------|----------|-------|--------|-----------------------|-------|-------|
| Eunice Monument<br>Eumont (EME) | A-16 EOL | A    | 16      | 21S      | 36E   | Lea    | Length                | Width | Depth |
|                                 |          |      |         |          |       |        | Eliminated            |       |       |

LAND TYPE: BLM        STATE X FEE LANDOWNER        OTHER       

Depth to Groundwater 195 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20\*

Date Started 6/25/2010 Date Completed 9/27/2010 OCD Witness No

Soil Excavated 6.7 cubic yards Excavation Length 5 Width 3 Depth 12 feet

Soil Disposed 12 cubic yards Offsite Facility Sundance Services, Inc. Location Eunice, NM

**FINAL ANALYTICAL RESULTS:** Sample Date 9/10/2010 Sample Depth 12 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 12' GRAB | 3.8             | <10.0     | <10       | 16             |

**CHLORIDE FIELD TESTS**

| LOCATION   | DEPTH | mg/kg |
|--|-------|-------|
| background   | 6"    | 57    |
| vertical delineation trench at the junction (source) | 2'    | 57    |
|  | 3'    | 54    |
|  | 4'    | 57    |
|  | 5'    | 61    |
|  | 6'    | 62    |
|  | 7'    | 92    |
|  | 8'    | 118   |
|  | 9'    | 86    |
|  | 10'   | 85    |
|  | 11'   | 141   |
|  | 12'   | 170   |

**General Description of Remedial Action:** This junction and line were eliminated under the pipeline replacement/upgrade program. After the former junction was removed, an investigation was conducted using a backhoe to collect soil samples at regular intervals, creating a 5x3x12-ft. Excavation. Chloride field tests were performed on each sample, which yielded low concentrations of chloride similar to that of the background sample. Organic vapors were measured using a PID, which also yielded low concentrations. The deepest sample, 12 ft BGS, was sent to a commercial laboratory for analysis, which confirmed low concentrations of chloride and organics. The excavated soil was returned to the excavation to ground surface and contoured to the surrounding area. On 9/27/2010, site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

\*Windmill 920 ft. SE

enclosures: photos, lab results, PID (field) screenings, chloride graph

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

SITE SUPERVISOR Robert Egans SIGNATURE *Robert Egans* COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Zach Conder INITIAL *ZC*

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE *Larry Bruce Baker Jr.* DATE 2-24-11



## EME A-16 EOL

Unit A, Section 16, T21S, R36E



Delineation trench being excavated

6/25/2010



Backfilling trench

9/27/2010



Seeding excavation

9/27/2010



Excavation complete

9/27/2010



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

**Analytical Results For:**

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

Received: 09/10/2010  
Reported: 09/16/2010  
Project Name: EME A-16 EOL 21/36  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 09/10/2010  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: SOURCE @12' (H020835-01)**

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            | 09/13/2010 | ND           | 448 | 112        | 400           | 3.51 |           |

TPH 8015M

mg/kg

Analyzed By: AB

S-04

| Analyte      | Result | Reporting Limit | Analyzed   | Method Blank | BS  | % Recovery | True Value QC | RPD  | Qualifier |
|--------------|--------|-----------------|------------|--------------|-----|------------|---------------|------|-----------|
| GRO C6-C10   | <10.0  | 10.0            | 09/15/2010 | ND           | 196 | 98.1       | 200           | 1.07 |           |
| DRO >C10-C28 | <10.0  | 10.0            | 09/15/2010 | ND           | 167 | 83.6       | 200           | 3.54 |           |

Surrogate: 1-Chlorooctane 84.4 % 70-130

Surrogate: 1-Chlorooctadecane 342 % 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

Page 2 of 4

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

[illegible]

**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 the client for the 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 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 or affiliates or successors 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.

|                              |  |              |                         |  |                |
|------------------------------|--|--------------|-------------------------|--|----------------|
| Relinquished By:             | Date:  | Received By: | Phone Result:           | <input type="checkbox"/> Yes <input type="checkbox"/> No | Add'l Phone #: |
| Robert                       | Time:  |              | Fax Result:             | <input type="checkbox"/> Yes <input type="checkbox"/> No | Add'l Fax #:   |
| Relinquished By:             | Date:  | Received By: | REMARKS:                |  |                |
|                              | 9/10/10  | Godi Idenson | E-Mail Results To:      |  |                |
|                              | Time: 4:36   |              | K Jones @ RiceSud . com |  |                |
|                              |  |              | Baker " " "             |  |                |
|                              |  |              | Kegan " " "             |  |                |
| Delivered By: (Circle One)   | Sample Condition   | CHECKED BY:  |                         |  |                |
| Sampler - UPS - Bus - Other: | Cool - Intact  | (Initials)   |                         |  |                |
|                              | <input type="checkbox"/> Yes <input type="checkbox"/> No |              |                         |  |                |
|                              | <input type="checkbox"/> Yes <input type="checkbox"/> No |              |                         |  |                |

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

#26

# 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: 590-000183  
 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: 592-903318

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

|                |                                |
|----------------|--------------------------------|
| LOT NO: 925621 | EXPIRATION DATE: 9-27-2012     |
| FILL DATE:     | METER READING ACCURACY: 100ppm |

ACCURACY : +/- 2%

| SYSTEM | JUNCTION | UNIT | SECTION | TOWN SHIP | RANGE |
|--------|----------|------|---------|-----------|-------|
| EME    | A-16     | A    | 16      | 21        | 36    |

| SAMPLE ID | PID  | SAMPLE ID | PID |
|-----------|------|-----------|-----|
| Source 7' | 10.8 |           |     |
| 8'        | 10.3 |           |     |
| 9'        | 3.6  |           |     |
| 10'       | 4.5  |           |     |
| 11'       | 2.5  |           |     |
| 12'       | 3.8  |           |     |
|           |      |           |     |
|           |      |           |     |
|           |      |           |     |
|           |      |           |     |
|           |      |           |     |
|           |      |           |     |
|           |      |           |     |
|           |      |           |     |

COPY

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

SIGNATURE:

*Robert Evans*

DATE: 9-10-2010



## CHLORIDE CONCENTRATION CURVE

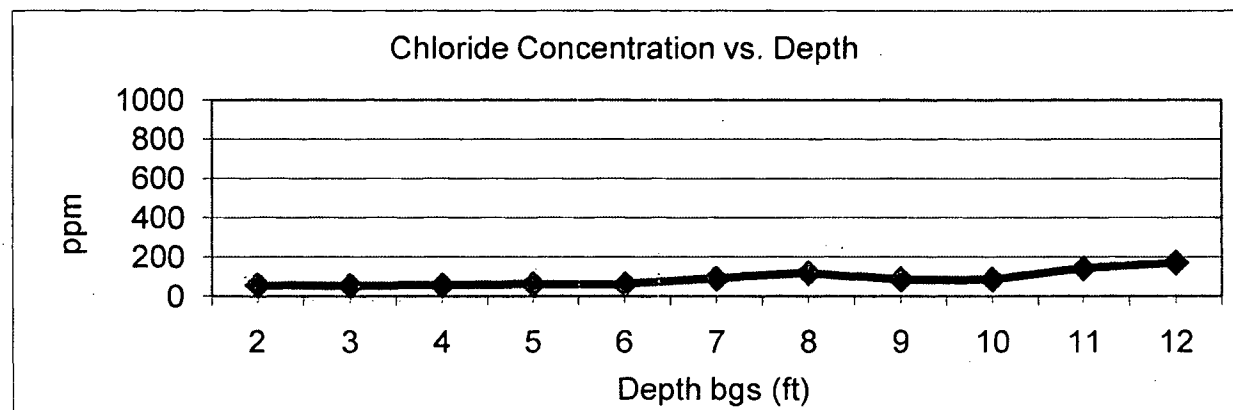
RICE Operating Company

### EME A-16 EOL

Unit 'A', Sec. 16, T21S, R36E

*Backhoe samples at the junction (source)*

| Depth bgs (ft) | [Cl] ppm |
|----------------|----------|
| 2              | 57       |
| 3              | 54       |
| 4              | 57       |
| 5              | 61       |
| 6              | 62       |
| 7              | 92       |
| 8              | 118      |
| 9              | 86       |
| 10             | 85       |
| 11             | 141      |
| 12             | 170      |



Groundwater = 195 ft.

# Current Photodocumentation

**RICE *Operating Company* (ROC)**

112 West Taylor Hobbs, NM 88240

Phone: (575) 393-9174 Fax: (575) 397-1471

**EME A-16 EOL**  
UL/A, Section 16, T21S, R36E



Facing northwest

2/6/2013



Facing east

2/6/2013