

1R - 427-293

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, April 09, 2013 5:11 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 (1R427-293) Termination - ROC EME Jct L-19-1 Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct L-19-1 Site
Unit Letter L, Section 19, T20S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-293) 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 (1R427-293) 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 Jct. L-19-1 (1R427-293): UL/L, Sec. 19, T20S, R37E
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 2009, ROC initiated work on the former L-19-1 junction box. The site is located in UL/L, Sec. 19, T20S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 32 +/- 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. The excavated soil was returned to the excavation and contoured to the surrounding area. On February 13, 2009, 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 abandoned facility and lease road 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.

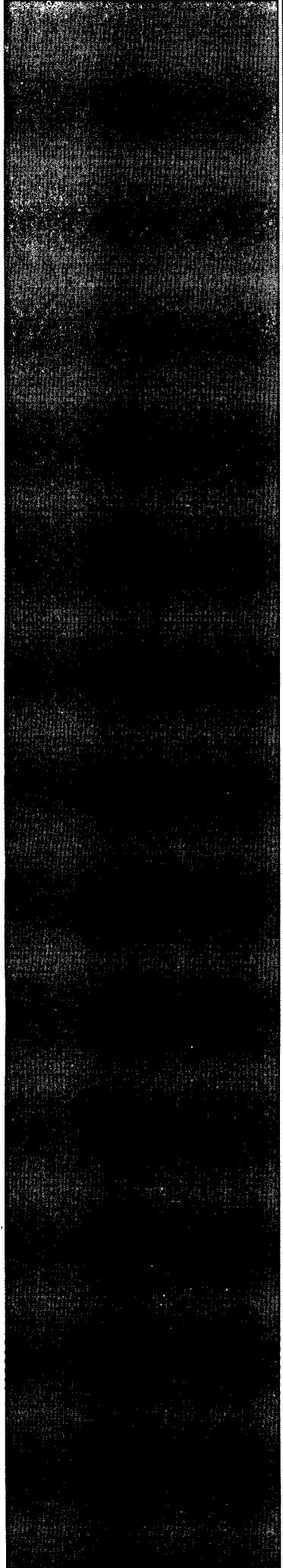
Please contact me at (575)393-9174 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,
RICE Operating Company

A handwritten signature in black ink, appearing to read "H. Conder", with a long horizontal flourish extending to the right.

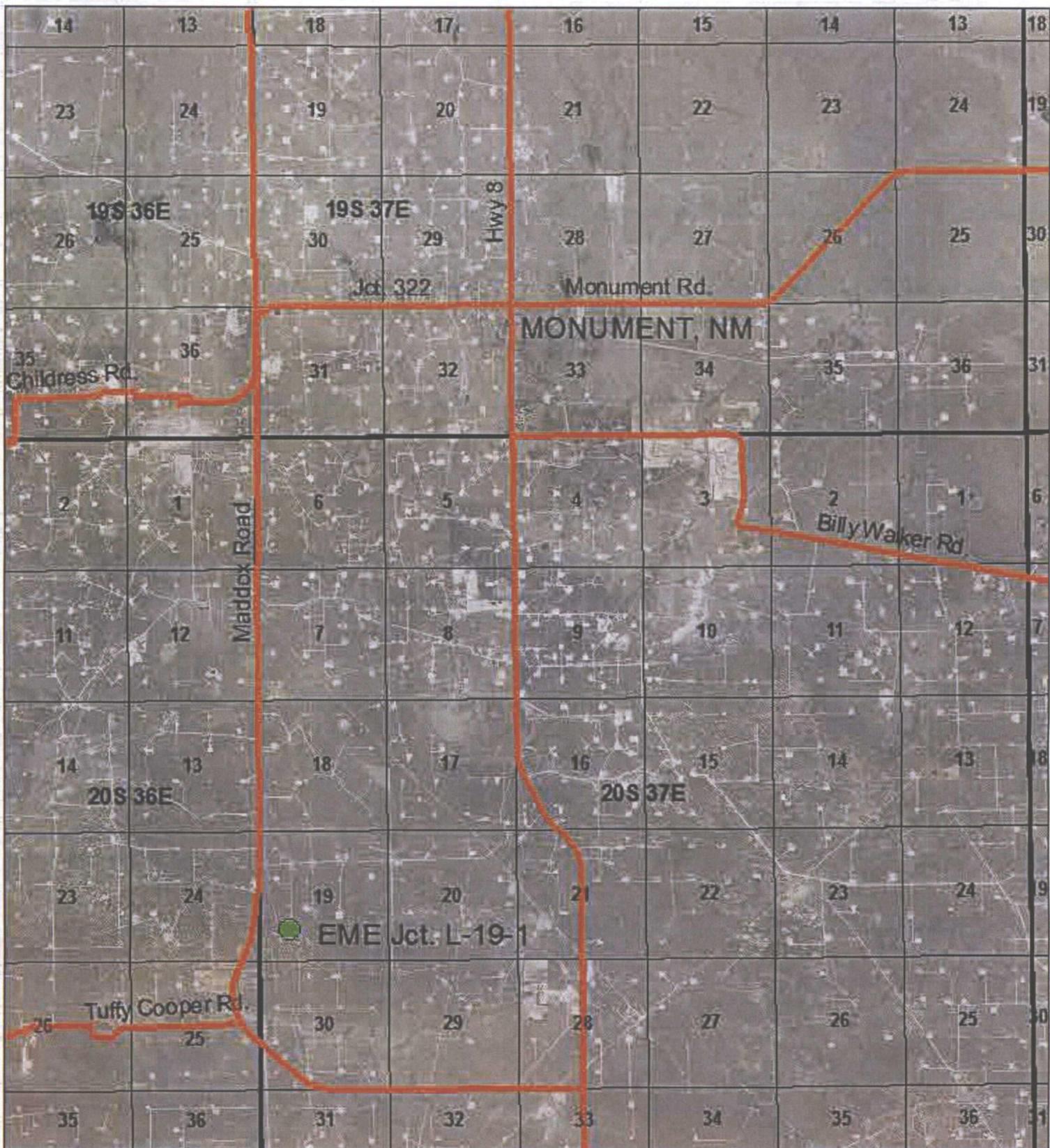
Hack Conder
Environmental Manager

enclosures



Site Location Map

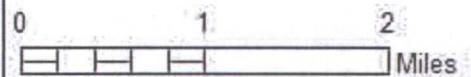
RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471



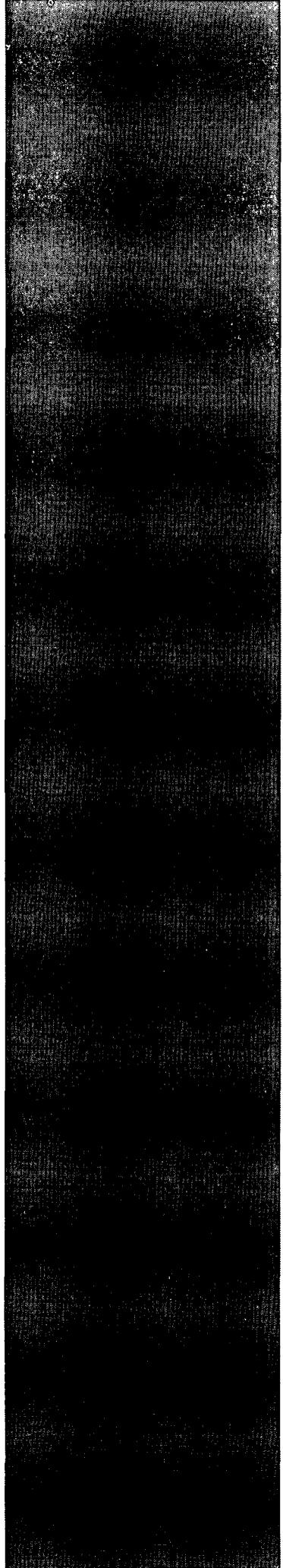
EME Jct. L-19-1

Unit Letter L, Section 19,
T20S, R37E
Lea County, NM

NMOCD Case #: 1R427-293



Drawing date: 3/26/13



Junction Box Report

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

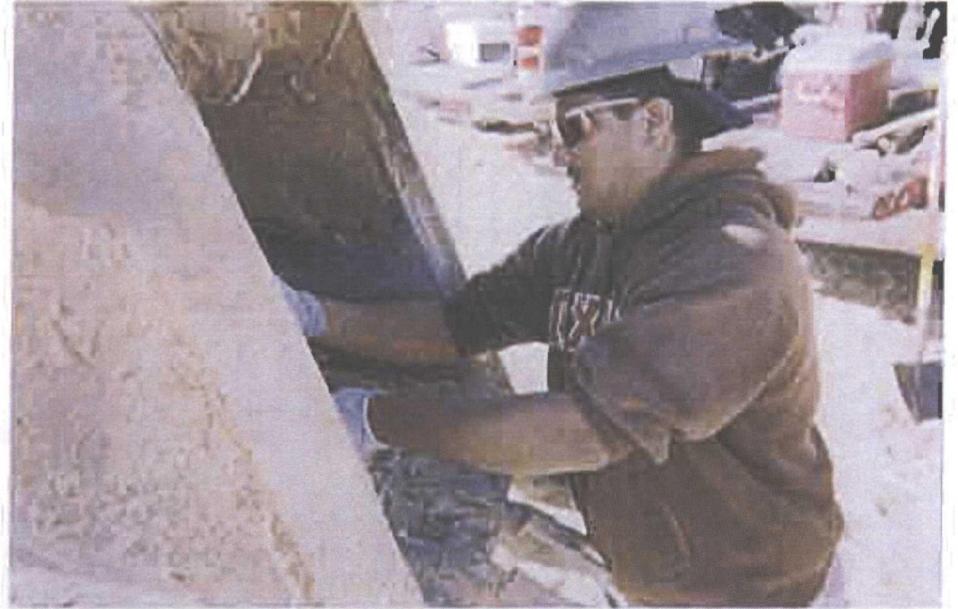
EME Jct. L-19-1

Unit L, Section 19, T20S, R37E



capped lines at the former junction box, facing southeast

1/9/2009



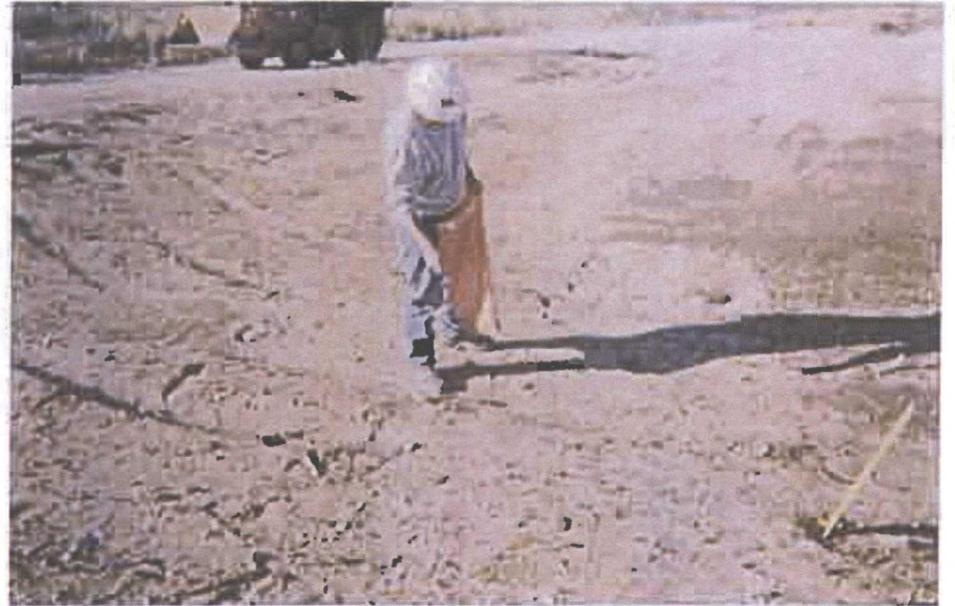
collecting a soil sample, facing southwest

1/9/2009



final 5x3x12-ft-deep excavation, facing north

1/9/2009



seeding backfilled site, facing north

2/13/2009



ANALYTICAL RESULTS FOR
 RICE OPERATING COMPANY
 ATTN: JORDAN WOODFIN
 122 W. TAYLOR
 HOBBS, NM 88240

COPY

Receiving Date: 01/09/09
 Reporting Date: 01/13/09
 Project Number: NOT GIVEN
 Project Name: EME JCT L-19-1
 Project Location: EME JCT L-19-1

Sampling Date: 01/09/09
 Sample Type: SOIL
 Sample Condition: COOL & INTACT
 Sample Received By: ML
 Analyzed By: AB/TR

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/kg)	DRO (>C ₁₀ -C _{...}) (mg/kg)	Cl ⁺ (mg/kg)
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ANALYSIS DATE	01/12/09	01/12/09	01/12/09
H16651-1 SOURCE BTM GRAB @ 12FT	≤10.0	<10.0	16
Quality Control	455	479	500
True Value QC	500	500	500
% Recovery	91.0	95.8	100
Relative Percent Difference	7.2	5.9	<0.1

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; Cl⁺: Std. Methods 4500-Cl⁺
 *Analysis performed on a 1:4 w:v aqueous extract.

[Signature]
 Chemist

[Signature]
 Date 01/14/09

H16651 TCL RICE

PLEASE NOTE: Liability and Damages: Cardinal's liability and client's responsibility for any claim arising, whether filed in contract or tort, shall be limited to the amount paid by client for analysis. 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, consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client. The substitution of alternate procedures or methods or changes to the performance of services shall not constitute a breach of Cardinal's obligations, whether such claim is based upon any of the above-stated reasons or otherwise. This report and its contents shall not be reproduced or reprinted in any form without the written approval of Cardinal Laboratories.



CARDINAL LABORATORIES

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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: RICE OPERATING		BILL TO		ANALYSIS REQUEST												
Project Manager: JORDAN WOODFIN		P.O. #:		<div style="text-align: center; font-size: 2em; font-weight: bold;">C/A</div>												
Address: 122 W TAYLOR		Company:														
City: HOBBS State: NM Zip: 88240		Attn:														
Phone #: 575) 393-9125 Fax #:		Address:														
Project #:		City:														
Project Name: EME JCT L-19-1		State: Zip:														
Project Location: EME JCT L-19-1		Phone #:														
Sampler Name: JORDAN WOODFIN		Fax #:														
Lab I.D.	Sample I.D.	# CONTAINERS	MATRIX					PRESERV			SAMPLING		DATE	TIME	Chloride	TRH BOLS
			GROUNDWATER	WASTEWATER	SOIL	SURFACE WATER	SLUDGE	OTHER	ACID/ASE	ICE/DREF	OTHER					
A116051	Source Btm Gravel @ R.F. 62	1		X					X			1-9-09	11:01 am	X	X	

PLEASE NOTE: Cardinal Laboratories liability and ability to detect analytes is based upon the type of sample submitted. Samples are analyzed as received unless otherwise noted. Samples are analyzed as received unless otherwise noted. Samples are analyzed as received unless otherwise noted.

Relinquished By: Jordan Woodfin	Date: 1-9-09	Received By: Mark Baker	Phone Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Phone #:
Time: 4:33			Fax Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Fax #:
Relinquished By:	Date:	Received By:	REMARKS:	
Time:			EMAIL RESULTS TO BBAKER@RICESWD.COM CC JFURVIS@RICESWD.COM CC JWOODFIN@RICESWD.COM	
Delivered By: (Circle One)	Sample Condition	CHECKED BY:		
<input checked="" type="checkbox"/> Sampler <input type="checkbox"/> UPS <input type="checkbox"/> Bus <input type="checkbox"/> Other	Cool: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Intact: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	HWB		

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

RICE OPERATING COMPANY

123 West Taylor Hobbs, NM 88240
 PHONE (505) 393-9174 FAX (505) 392-1471
 BID-METER CALIBRATION & FIELD REPORT FORM

OK	<input type="checkbox"/>
MODEL	<input type="checkbox"/>
NO	<input checked="" type="checkbox"/>

MODEL: PCM 7300	SERIAL NO: 590-000183
MODEL: PCM 7600	SERIAL NO: 110-01344
MODEL: PCM 7600	SERIAL NO: 110-12313
MODEL: PCM 7600	SERIAL NO: 110-02390

COPY

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR BALANCE

LOT NO: 07-3353	EXPIRATION DATE: 10-12-09
FILE DATE: 10-12-07	METER-READING ACCURACY: 98.0

ACCURACY: +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	L-19-1	L	19	20S	37E

SAMPLE ID	PID	SAMPLE ID	PID
SOURCE			
3'	7.8		
4'	1.8		
5'	0.4		
6'	0		
7'	0		
8'	0		
9'	0		
10'	0		
11'	0		
12'	0		

I certify that I have calibrated the above instrument in accordance with the manufacturer's operating manual.

SIGNATURE: *Jordan Wood*

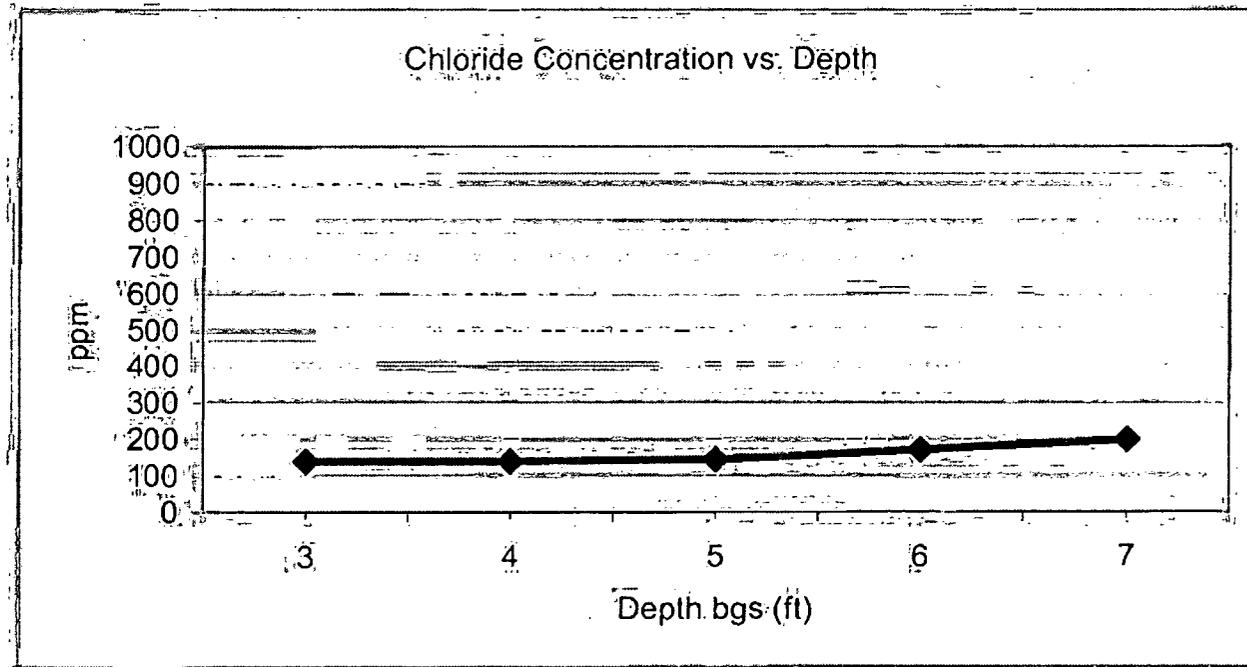
DATE: 1-9-09

EME Jct. L-19-1

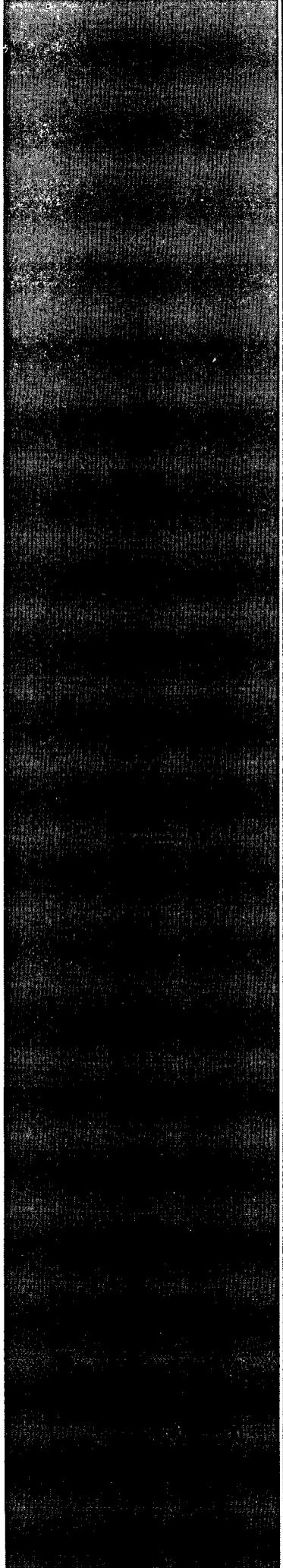
Unit 'L', Sec. 19, T20S, R37E

Backhoe samples at the junction (source)

Depth bgs (ft)	[Cl ⁻] ppm
3	139
4	139
5	143
6	170
7	198
8	177
9	174
10	175
11	170
12	204



Groundwater = 32 ft



Current Photodocumentation

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

EME Jct. L-19-1
UL/L, Section 19, T20S, R37E



Facing north

2/22/2013



Facing west

2/22/2013