

1R - 427-307

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, April 17, 2013 6:20 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 (1R427-307) Termination - ROC EME Jct F-19 EOL Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct F-19 EOL Site
Unit Letter F, Section 19, T20S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-307) 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 April 5, 2013 (received April 9, 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 (1R427-307) 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 9330

RECEIVED

April 5, 2013

APR 9 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 Jct. F-19 EOL (1R427-307): UL/F, 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 F-19 EOL junction box. The site is located in UL/F, 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 10x10x12 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 excavated soil was blended on site and representative composite samples were collected from the excavation walls, bottom and blended backfill, resulting in a 4-wall chloride and gasoline range organics (GRO) concentration below detectable limits and a diesel range organics (DRO) of 11.4 mg/kg. The bottom sample resulted in a chloride and GRO concentration below detectable limits and a DRO concentration of 38.0 mg/kg. The blended backfill sample resulted in chloride, GRO and DRO concentrations below detectable limits. The blended backfill 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 a 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.

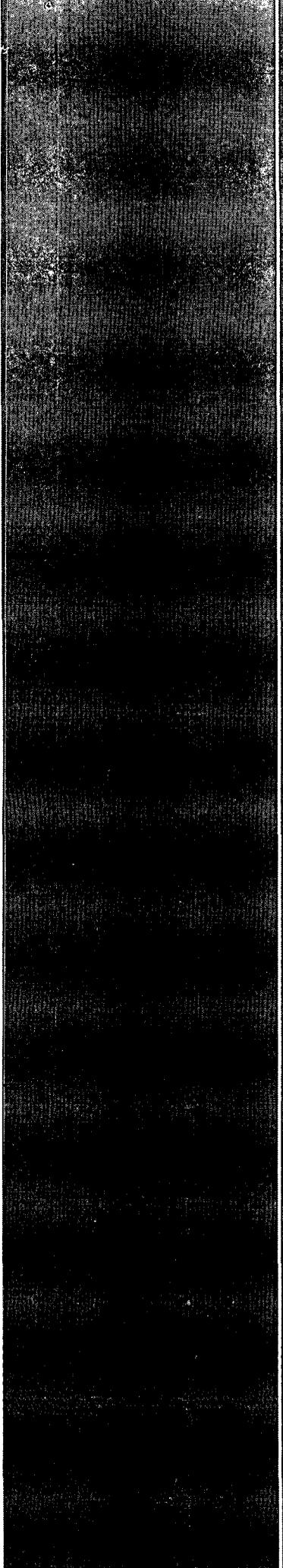
Sincerely,
RICE Operating Company



Hack Conder
Environmental Manager

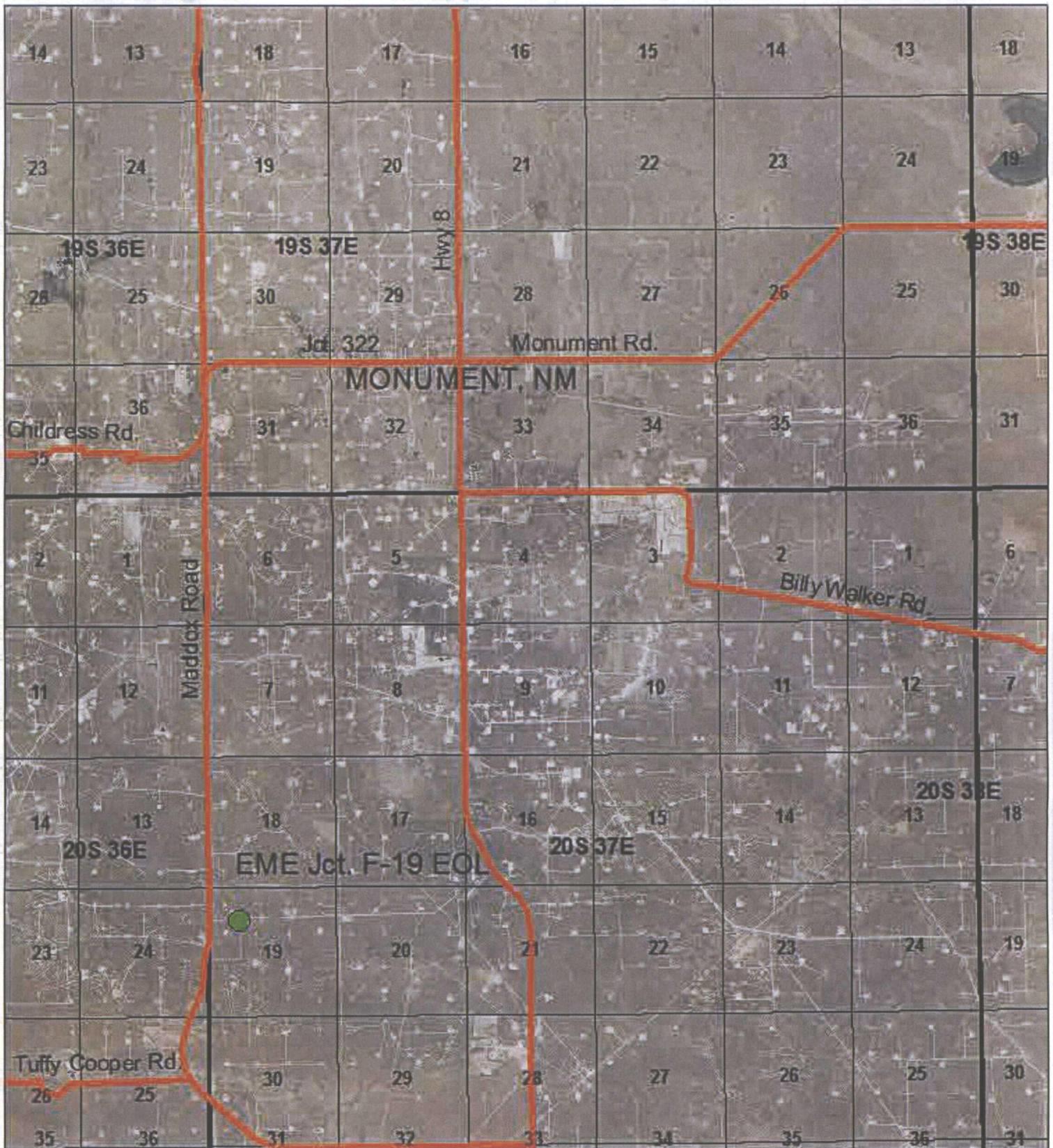
enclosures

RECEIVED OGD
2013 APR -9 P 2:48



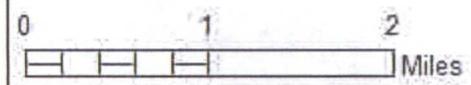
Site Location Map

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

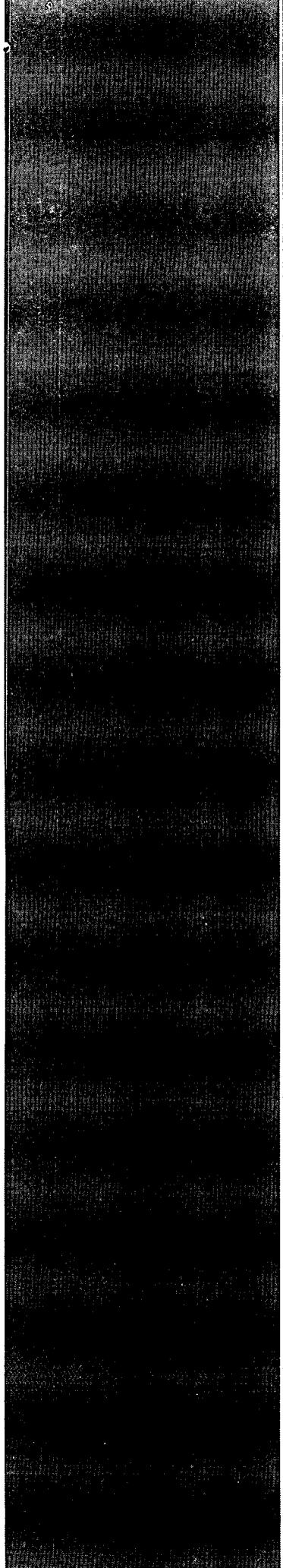


**EME Jct.
F-19 EOL**

UL F SECTION 19
T-20-S R-37-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		
							Length	Width	Depth
Burice Monument Emort (EME)	Jct F-19 EOL	F	19	20S	37E	Lea	eliminated		

LAND TYPE: BLM STATE X FEE LANDOWNER OTHER

Depth to Groundwater 32 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 1/9/2009 Date Completed 2/10/2009 OCD Witness no

Soil Excavated 44 cubic yards Excavation Length 10 Width 10 Depth 12 feet

Soil Disposed 0 cubic yards Offsite Facility n/a Location n/a

FINAL ANALYTICAL RESULTS: Sample Date 1/13/2009 Sample Depth 12 ft

Procure 5-point composite sample of bottom and 4-point composite sample of sidewalls. TPH and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines.

CHLORIDE FIELD TESTS

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
4-WALL COMP	0.0	<10.0	11.4	<16
BOTTOM COMP	0.1	<10.0	38.0	<16
BLENDED BACKFILL	3.1	<10.0	<10.0	<16

LOCATION	DEPTH	mg/kg
4-wall comp.	n/a	141
bottom comp.	12'	173
blended backfill	n/a	180
background	6"	145
vertical delineation trench at 5 ft East of the junction (source)	1'	149
	2'	152
	3'	154
	4'	142
	5'	146
	6'	175
	7'	148
	8'	200
	9'	199
	10'	176
	11'	171
	12'	151

General Description of Remedial Action: This junction box was eliminated during the pipeline replacement/upgrade program. After the former junction box was removed, an investigation was conducted using a backhoe to collect soil samples at regular intervals producing a 10x10x12-ft deep excavation. Chloride field tests were performed on each sample, which yielded low concentrations. Organic vapors were measured using a PID, which also yielded low concentrations. Representative composite samples were collected from the excavation walls, bottom, and the excavated soil. The representative samples were sent to a commercial laboratory for analysis of chloride and TPH, which confirmed low concentrations. The excavated soil was then returned to the excavation to ground surface and contoured to the surrounding area. On 2/13/2009, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

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

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

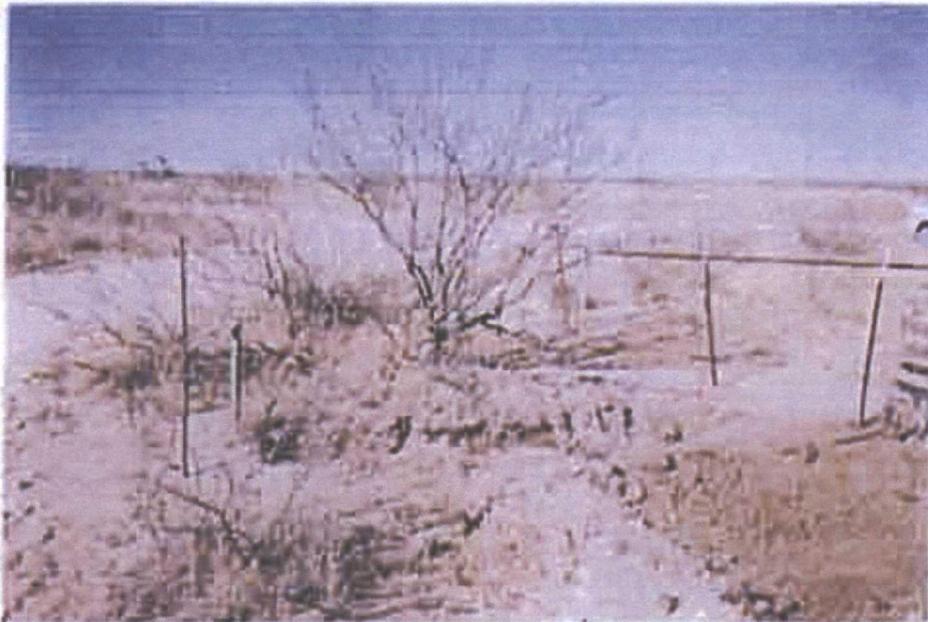
SITE SUPERVISOR Jordan Woodfin SIGNATURE *Jordan Woodfin* COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Katie Jones INITIAL KJ

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE *Larry Bruce Baker Jr.* DATE 5-7-09

EME Jct. F-19 EOL

Unit F, Section 19, T20S, R37E



site prior to excavation, facing northwest

1/9/2009



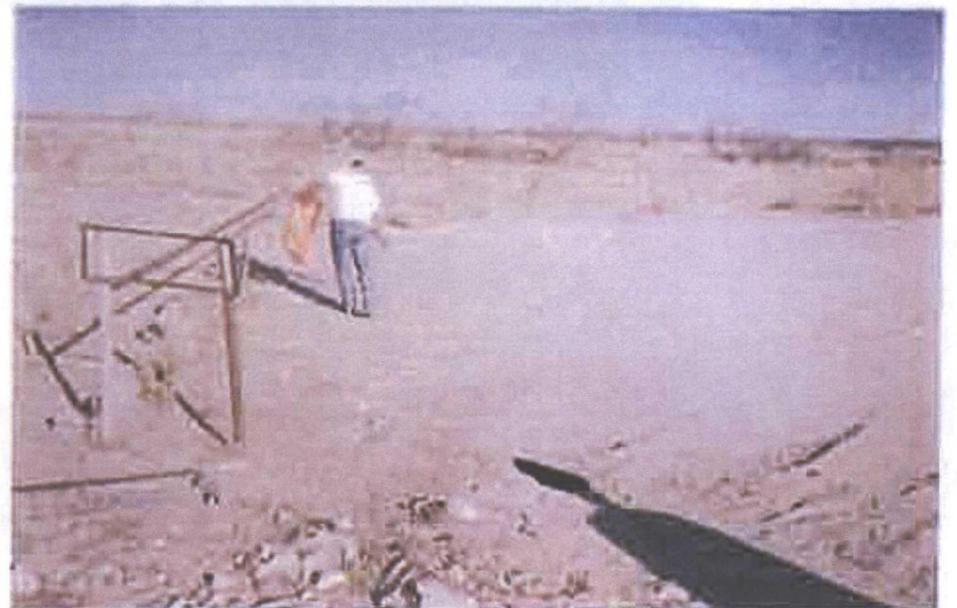
collecting a soil sample, facing south

1/12/2009



final 10x10x12-ft excavation, facing northwest

2/10/2009



seeding backfilled site, facing east

2/13/2009



CARDINAL LABORATORIES

101 East Mallard, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603
(505) 341-2126 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: RUE OPERATING	BILL TO	ANALYSIS REQUEST
Project Manager: JORDAN WOODFIN	Project:	
Address: 122 W. TR/COIL	Company:	
City: ABILENE State: NM Zip: 89240	Address:	
Phone: 513-9174 Fax:	City:	
Project #: _____ Project Owner:	State: _____ Zip:	
Project Name: EME SGT FIELD EOL	Phone #1:	
Project Location: EME SGT FIELD EOL	Fax #:	
Sample #/Title: JORDAN WOODFIN		

COPY

Lab ID	Sample ID	CONTAINER	MATRIX							PRESERV		SAMPLING		DATE	TIME	ANALYST
			GLASS	PLASTIC	OTHER	OTHER	OTHER	OTHER	OTHER	OTHER	OTHER	OTHER				
1	Base fill	1												11-29-12	12:40	X
2	down comp	1												11-29-12	12:40	X
3	SGT Bottom comp	1												11-29-12	10:22	X

Lab/office: 2111 Beechwood Abilene TX 79603

Relinquished By: JORDAN WOODFIN	Date: 1-13-07	Received By: Michelle DeB...	Phone Record: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Relinquished By:	Date:	Received By:	Fax Record: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Relinquished By: (Circle One) Sample #/Title: _____	Sample Condition: Cool <input type="checkbox"/> Warm <input type="checkbox"/> Sealed <input type="checkbox"/> Open <input type="checkbox"/> Original <input type="checkbox"/> Repack <input type="checkbox"/>	Checked By: [Signature]	REMARKS: GIVE RESULTS TO: EBAKER@Riceswd.com CEJPRUVS@Riceswd.com CJWoodfin@Riceswd.com

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

RICE OPERATING COMPANY

125 West 7th Street, Suite 1000
 Houston, Texas 77001-1421 FAX: (281) 397-1421
 PULVERIZER CALIBRATION & FIELD REPORT FORM

<input type="checkbox"/> MODEL <input type="checkbox"/> SERIAL NO.	<div style="display: flex; flex-direction: column; justify-content: space-around;"> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> <div style="border: 1px solid black; width: 40px; height: 15px;"></div> </div>	MODEL: PCIM 7600 SERIAL NO: 110-019741 MODEL: PCIM 7600 SERIAL NO: 110-02883 MODEL: PCIM 7600 SERIAL NO: 110-021658
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COPY

CALIBRATION REPORT FROM RICE OPERATING COMPANY

METER NO: 21442 07-3353	CALIBRATION DATE: 4-12-09
METER DATE: 10-12-07	METER READING ACCURACY: 98.7

ACCURACY: **±0.4%**

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
EME	F-19 EOL	F	19	208	37E

SAMPLE ID	PH	SAMPLE ID	PH
Backfill	3.1		
5ft Bottom Comp	0.1		
4' Ince Comp	0		

I certify that this calibration was performed in accordance with the procedures specified in the manual.

Technician: *Justin Wood*

DATE: **4-13-09**

CHLORIDE CONCENTRATION CURVE

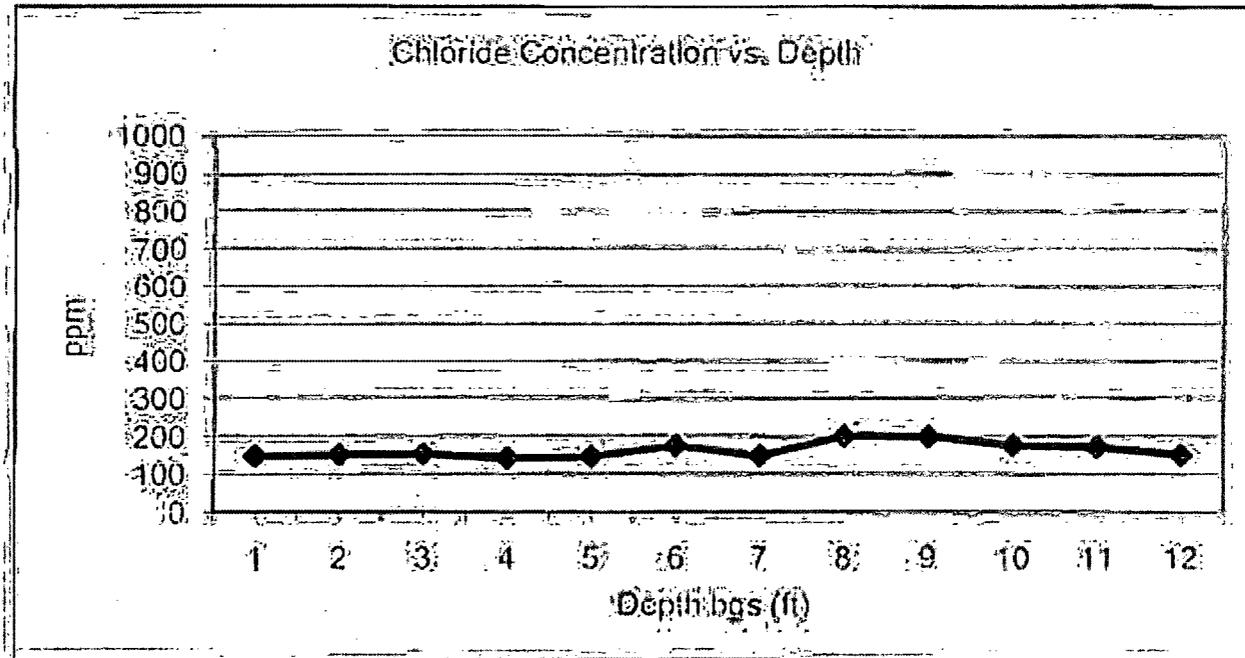
RICE Operating Company

EME Jct. F-19 EOL

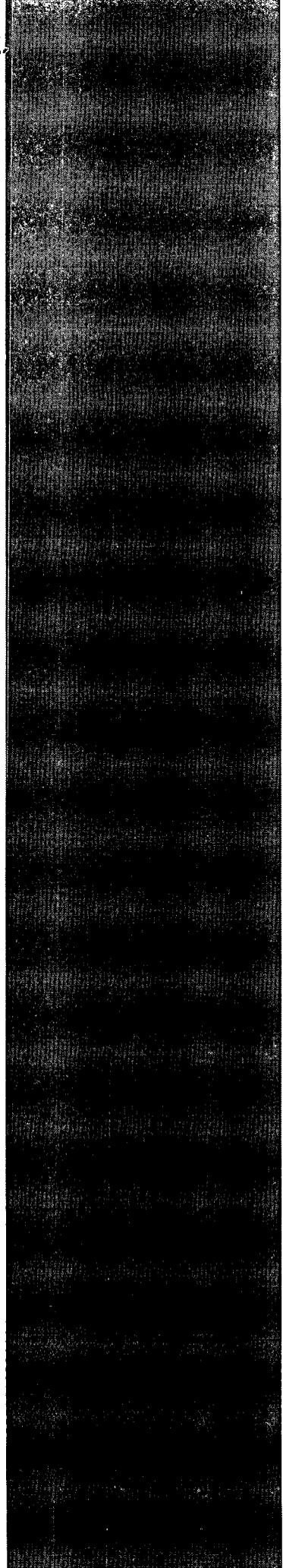
Unit F, Sec. 19, T20S, R37E

Backhoe samples at 5 ft. East of the junction (source)

Depth bgs (ft)	[Cl] ppm
1	149
2	152
3	154
4	142
5	116
6	175
7	148
8	200
9	199
10	176
11	171
12	151



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. F-19 EOL
UL/F, Section 19, T20S, R37E



Facing west

2/22/2013



Facing east

2/22/2013