

1R - 427-332

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, May 20, 2013 3:07 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 (1R427-332) Termination - ROC EME Jct M-13 Site

**RE: Termination Request
for the Rice Operating Company's
EME Jct M-13 Site
Unit Letter M, Section 13, T20S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-332) 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 26, 2013 (received May 3, 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 (1R427-332) 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*

122 West Taylor • Hobbs, New Mexico 88240

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

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 9224

RECEIVED

April 26, 2013

MAY 3 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. M-13 (1R427-332): UL/M, Sec. 13, T20S, 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 M-13 junction box. The site is located in UL/M, Sec. 13, T20S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 26 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x2x12 ft deep excavation. Each sample was field titrated for chlorides and screened for TPH, resulting in low concentrations of each. The 12 ft sample was sent to a commercial for analysis of chloride and TPH, resulting in a chloride concentration of 192 mg/kg and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The excavation was backfilled with the excavated soil to ground surface and contoured to the surrounding area. On 9/17/2010, the site was seeded with a blend of native vegetation.

On 4/4/2013, the site was seeded with a blend of native vegetation. Vegetation will act as an evapo-transpiration barrier that will also inhibit the downward migration of chlorides and hydrocarbons. Plants capture water through their roots and so reduce the amount of water infiltrating below the root zone. The site revegetation form and photos of these activities are attached.

The junction box site location map, final report, photodocumentation, laboratory analysis, PID sheet, chloride graph, revegetation form and seeding 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

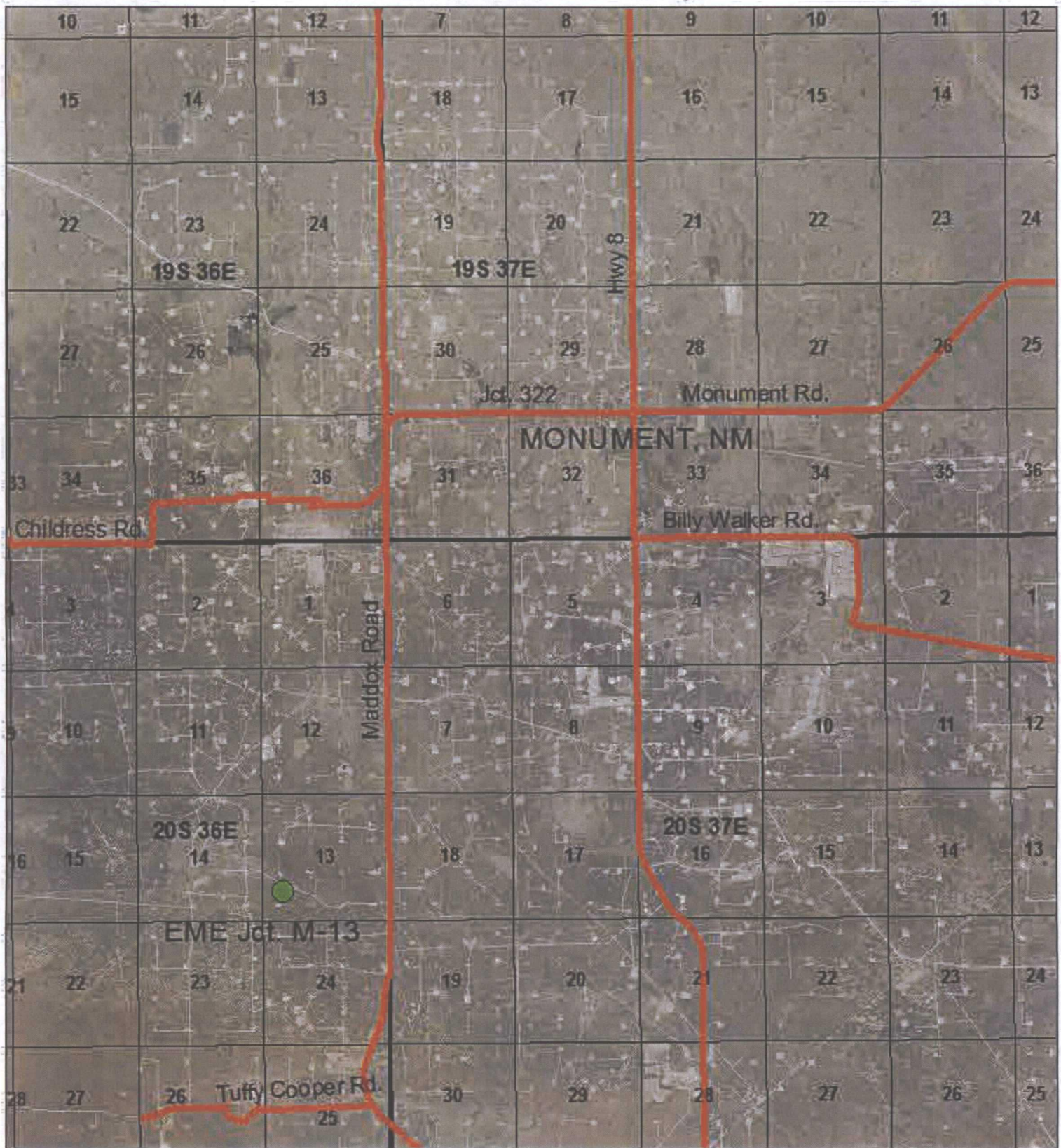
RECEIVED OGD
2013 MAY -3 P 2:22



Site Location Map

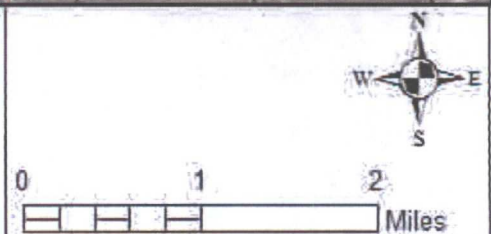
RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471

Site Location Map



**EME Jct. M-13
(1R427-332)**

UL M, SECTION 13,
T-20-S, R-36-E
IEA COUNTY, NM



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

Area Map



EME JCT M-13

UL/M SECTION 13
T-20-S R-36-E
IEA COUNTY, NM



0 500 1,000
Feet

Drawing date: 4/25/13
Drafted by: T. 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 Eumont (EME)	Jct. M-13	M	13	20S	36E	Lea	Length	Width	Depth
							Eliminated		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER Jimmie Cooper OTHER _____

Depth to Groundwater 26 feet NMOC SITE ASSESSMENT RANKING SCORE: 20

Date Started 9/17/2010 Date Completed 9/17/2010 OCD Witness no

Soil Excavated 4.4 cubic yards Excavation Length 5 Width 2 Depth 12 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 9/17/2010 Sample Depth 12 ft.

TPH and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOC guidelines.

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
SOURCE 12' GRAB	0.0	<10.0	<10	192

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
background	6'	115
vertical delineation trench at the junction (source)	5'	86
	6'	114
	7'	120
	8'	85
	9'	87
	10'	83
	11'	57
	12'	57

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. 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 9/17/2010, 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 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 Larry Bruce Baker Jr. INITIAL LB

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE *Larry Bruce Baker Jr.* DATE 1-29-11

EME Junction M-13

Unit M, Section 13, T20S, R36E



Site prior to excavating

9/17/2010



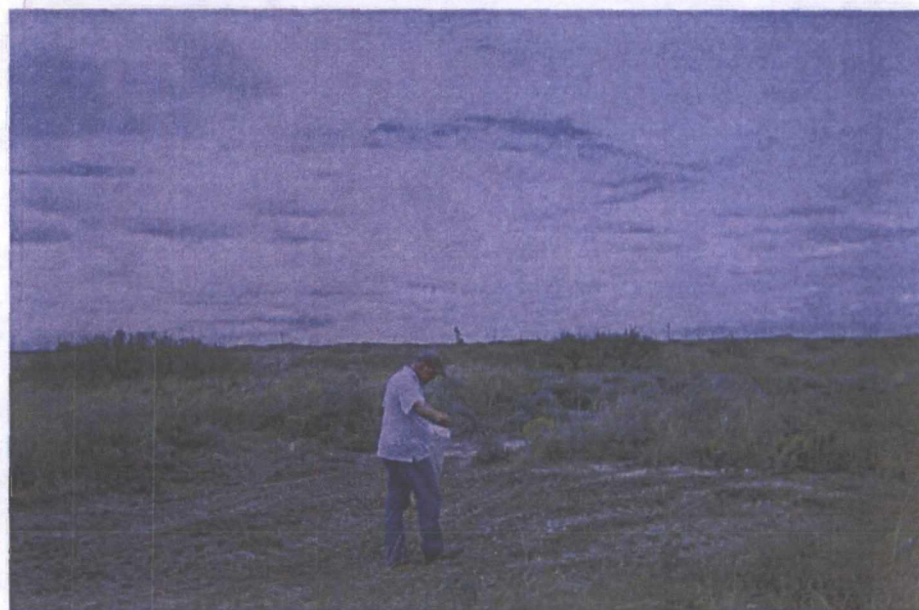
Delineation trench being excavated

9/17/2010



Backfilling excavation

9/17/2010



Seeding excavation

9/17/2010



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: 09/17/2010
Reported: 09/21/2010
Project Name: EME JCT M-13 (20/36)
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 09/17/2010
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: SOURCE @ 12' (H020883-01)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	192	16.0	09/21/2010	ND	416	104	400	3.77	
TPH 8015M		mg/kg		Analyzed By: AB					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	09/20/2010	ND	174	87.1	200	2.17	
DRO >C10-C28	<10.0	10.0	09/20/2010	ND	165	82.4	200	0.797	
Surrogate: 1-Chlorooctane	93.6 %	70-130							
Surrogate: 1-Chlorooctadecane	45.4 %	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.

Celestine D. Keene, Lab Director/Quality Manager

Page 2 of 4

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

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 services. 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, 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.

† 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: 110-013676

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	M-13	M	13	20	36

SAMPLE ID	PID	SAMPLE ID	PID
Background	0		
Source 5'	0		
6'	0		
7'	0		
8'	0		
9'	0		
10'	0		
11'	0		
12'	0		

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

SIGNATURE:

[Signature]

DATE:

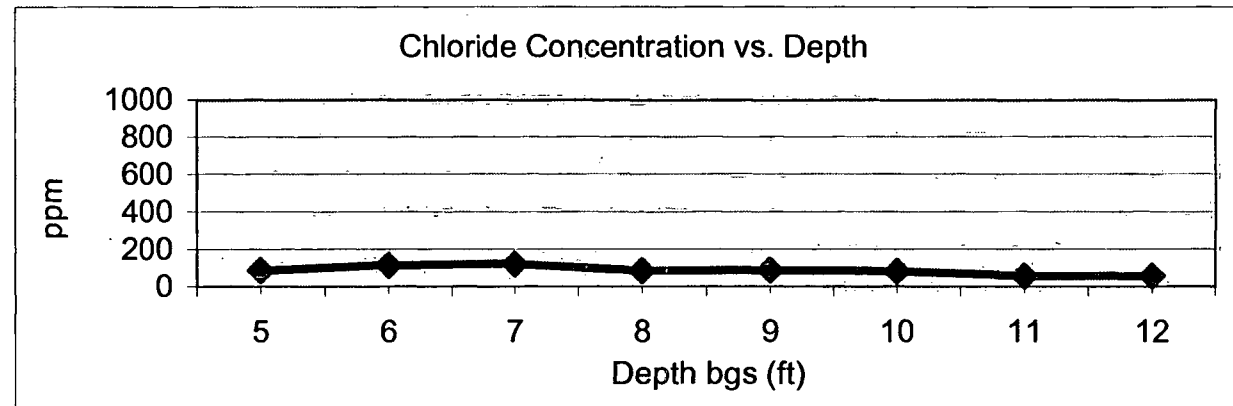
9-17-2010

EME Junction M-13

Unit 'M', Sec. 13, T20S, R36E

Backhoe samples at the junction (source)

Depth bgs (ft)	Cl ppm
5	86
6	114
7	120
8	85
9	87
10	83
11	57
12	57



Groundwater = 26 ft.



Revegetation Form and Photodocumentation

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



PO Box 5630
Hobbs, NM 88241
Phone: (575) 393-4411
Fax: (575) 393-0293

REVEGETATION FORM

1. General Information

Site name: EME Jct. M-13						
U/L M	Section 13	Township 20S	Range 36E	County Lea	Latitude N32°34'9.411	Longitude W103°18'49.714
Contact Name: Hack Conder						
Email: hconder@rice-ecs.com						
Site size: 20'x20'			Map detail of site attached <input type="checkbox"/>			
Square feet: 400						
Additional information:						

2. Soils

**Do not rip caliches subsoils: caliche rocks brought to the surface by ripping shall be removed.*

Salvaged from site <input checked="" type="checkbox"/>	Bioremediated <input type="checkbox"/>	Imported <input type="checkbox"/>	Blended <input type="checkbox"/>	Depth (in):	
Texture:		Describe soil & subsoil:			
Soil prep methods:	Rip <input type="checkbox"/>	Depth(in):	Disc <input type="checkbox"/>	Depth (in):	Roller pack <input type="checkbox"/>
Date completed: 9/17/2010					

3. Bioremediation

Fertilizer <input checked="" type="checkbox"/> 1 bag Restor N Hance	Hay <input type="checkbox"/>	Other <input checked="" type="checkbox"/> 1 bag Garden Soil
Type:		Describe: 1/2 bag manure
Lbs/acre:		

4. Seeding

**Attach seed bag tags to this form. Seed bag tags shall contain the site name and S-T-R.*

Custom seed mix <input checked="" type="checkbox"/>	Prescribed mix <input type="checkbox"/>	Seed mix name: 1 lb Side oats, 1 lb. Lea County Mix, 1lb. Blue Grama
Seeding date: 4/4/2013		
Broadcast <input checked="" type="checkbox"/>		
Method: Mechanical Drop Seeder		
Soil conditions during seeding: Dry <input checked="" type="checkbox"/> Damp <input type="checkbox"/> Wet <input type="checkbox"/>		
Photos attached <input type="checkbox"/>	Observations:	
Number of photos:		

5. Certification

I hereby certify that the information in this form and attachments is true and complete to the best of my knowledge and belief.

Name: Kyle Norman	Title: Environmental Tech	Date: 4/4/2013
Signature: <i>Kyle Norman</i>		

EME Jct. M-13 (1R427-332)

UL/M, Section 13, T20S, R36E



Spreading amendments, facing north

4/4/2013



Tilling site, facing south

4/4/2013



Seeding site, facing west

4/4/2013



Site complete, facing west

4/4/2013