

1R - 427-34

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, May 30, 2013 3:46 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 (1R427-34) Termination - ROC EME I-9-1 Site

**RE: Termination Request
for the Rice Operating Company's
EME I-9-1 Site
Unit Letter I, Section 9, T21S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-34) 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 May 8, 2013 (received May 20, 2013) and additional information of May 30, 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 (1R427-34) 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 9231

RECEIVED

May 8, 2013

MAY 20 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 I-9-1 (1R427-34): UL/I, Sec. 9, 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 2003, ROC initiated work on the former I-9-1 junction box. The site is located in UL/I, Sec. 9, T21S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 200 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 30x14x12 ft deep excavation. Each sample was field titrated for chlorides, resulting in chloride concentrations that decreased with depth. Representative composite samples of the excavation walls, bottom and remediated backfill were sent to a commercial for analysis of chloride and TPH, resulting in a 4-wall chloride concentration of 144 mg/kg and concentrations of gasoline range organics (GRO) concentration and diesel range organics (DRO) below detectable limits. The bottom composite resulted in a chloride concentration of 592 mg/kg and concentrations of GRO and DRO below detectable limits. The remediated backfill resulted in a chloride concentration of 304 mg/kg and concentrations of GRO and DRO below detectable limits. The excavation was backfilled with the remediated soil to ground surface and contoured to the surrounding area. On 12/12/2003, the site was seed with a blend of native vegetation. A new, watertight junction was installed over the site; therefore, additional seeding is not required.

The junction box site location map, area map, final report, photodocumentation, laboratory analysis, field notes 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.

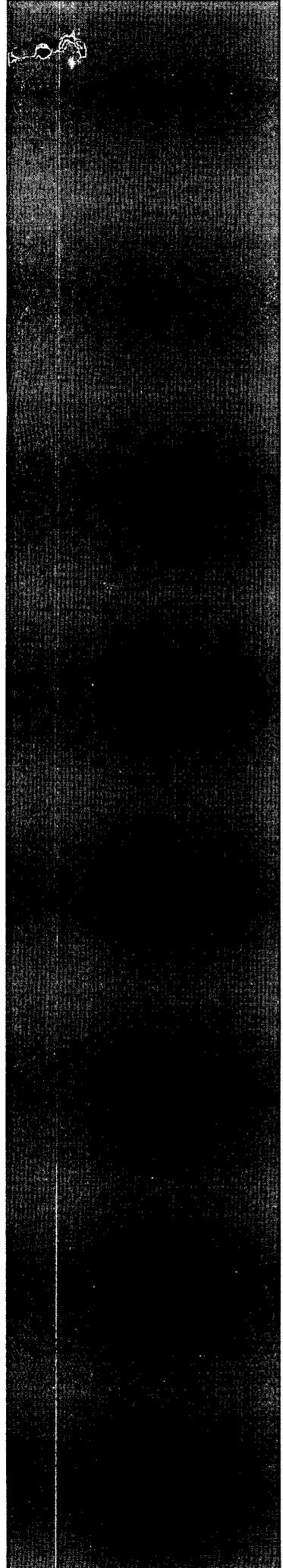
Sincerely,
RICE Operating Company



Hack Conder
Environmental Manager

enclosures

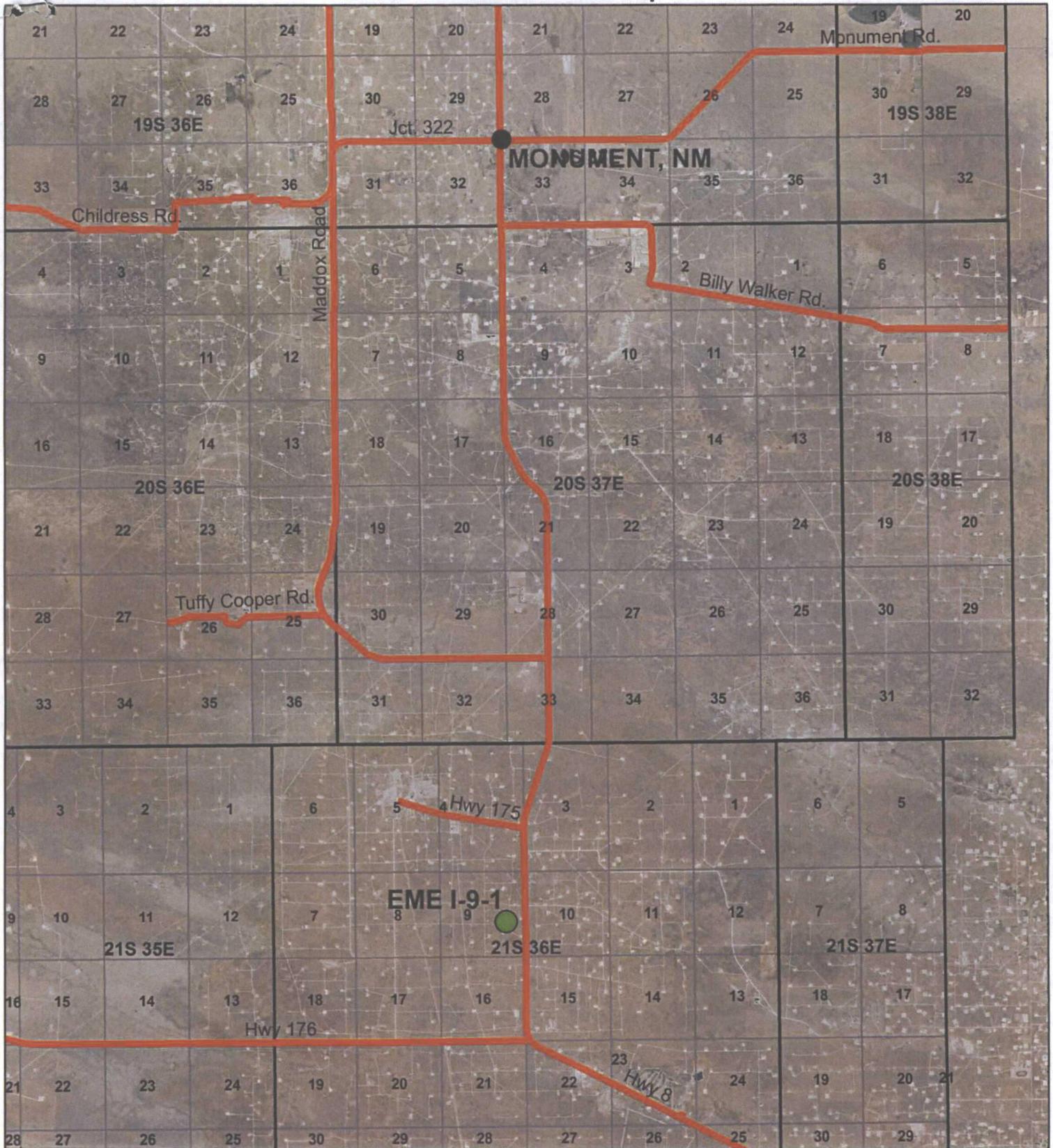
RECEIVED OOD
2013 MAY 17 P 2:25



Site Maps

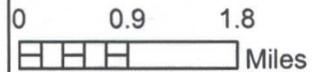
RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471

Site Location Map

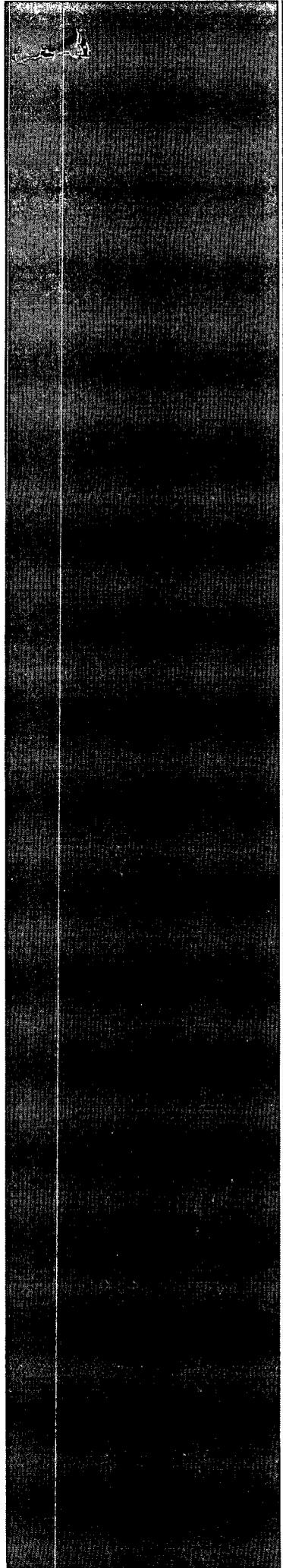


EME Jct. I-9-1 (1R427-34)

**UL/I SECTION 9
T21S, R36E
LEA COUNTY, NM**



Drawing date: 5/3/13



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
EME	I-9-1	I	9	21 S	36 E	Lea	6	5	9

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER Millard Deck OTHER _____

Depth to Groundwater 200 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 9/12/2003 Date Completed 9/30/2003 OCD Witness No

Soil Excavated 187 cubic yards Excavation Length 30 Width 14 Depth 12 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 9/15/2003 Sample Depth 12 ft bgs

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	PID ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
SIDEWALLS	12	<10.0	<10.0	144
BOTTOM	22	<10.0	<10.0	592
REMIATED	64	<10.0	<10.0	304

CHLORIDE FIELD TESTS

General Description of Remedial Action: This junction site was delineated with a backhoe and chloride and PID readings were taken regularly. Chloride concentrations exhibited a conclusive vertical and lateral decline. PID readings were very low throughout and lab results confirmed that TPH concentrations are well below NMOCD guidelines.

The excavated soil was land farmed on-site and then backfilled into the hole. The junction has been re-plumbed with a new poly pipeline and a new water-tight junction box has been built over it. The disturbed surface was re-seeded with a blend of native vegetation on 12/12/2003 and will be monitored for growth.

enclosures: lab results, chloride graph, photos, PID readings

LOCATION	DEPTH (ft)	ppm
vertical	8	4482
	9	1885
	10	1329
	11	1101
	12	929
	13	744
	14	573
4-wall comp.	n/a	193
bottom comp.	12	506
remed. comp.	n/a	292

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

DATE 12/30/2003 PRINTED NAME Kristin Farris
SIGNATURE Kristin Farris TITLE Project Scientist

EME jct. I-9-1



Undisturbed junction box

7/23/2003



30 x 14 x 12-ft-deep Excavation

9/15/2003



Construction of New Junction Box

10/2/2003



Seeding Disturbed Surface

12/12/2003

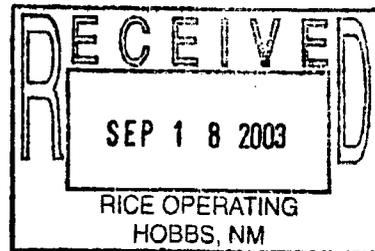


ARDINAL LABORATORIES

PHONE (325) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

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

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



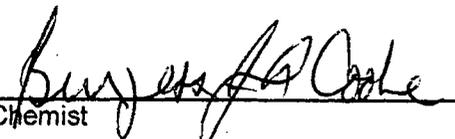
Receiving Date: 09/15/03
Reporting Date: 09/16/03
Project Number: NOT GIVEN
Project Name: EME I-9-1
Project Location: LEA CO., NM

Sampling Date: 09/15/03
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (>C ₁₀ -C ₂₈) (mg/Kg)	Cl* (mg/Kg)
ANALYSIS DATE		09/15/03	09/15/03	09/16/03
H8004-1	BOTTOM COMPOSITE 12'	<10.0	<10.0	592
H8004-2	4 WALL COMPOSITE	<10.0	<10.0	144
H8004-3	STOCKPILE COMPOSITE	<10.0	<10.0	304
Quality Control		777	821	970
True Value QC		800	800	1000
% Recovery		97.1	103	97.0
Relative Percent Difference		11.3	12.1	1.0

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; Cl: Std. Methods 4500-ClB

*Analyses performed on 1:4 w:v aqueous extracts.


Chemist

9/16/03
Date

H8004.XLS

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 services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



ARDINAL LABORATORIES, INC.

2111 Beechwood, Abilene, TX 79603 101 East Marland, Hobbs, NM 88240
(915) 673-7001 Fax (915) 673-7020 (505) 393-2326 Fax (505) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page ____ of ____

Company Name: RICE Operating Company
 Project Manager: Kristin Ferris
 Address: 122 W. Taylor
 City: Hobbs, State: NM Zip: 88240
 Phone #: 393-9174 Fax #: 397-1471
 Project #: _____ Project Owner: _____
 Project Name: EME I-9-1
 Project Location: Lee
 Sampler Name: Gary Sterle

BILL TO
 P.O. #: _____
 Company: RICE
 Attn: _____
 Address: _____
 City: _____
 State: _____ Zip: _____
 Phone #: _____
 Fax #: _____

ANALYSIS REQUEST											
DATE	TIME	TEST	ANALYST	LAB	CLIENT	PROJECT	LOCATION	DEPTH	DEPTH	DEPTH	DEPTH
9-15-03	15:16	X	X								
9-15-03	15:45	X	X								
9-15-03	16:01	X	X								

TRN 8015
Chloride

Lab I.D.	Sample I.D.	(GRAB OR (C)OMP. # CONTAINERS)	MATRIX					PRESERV		SAMPLING		
			GROUNDWATER	WASTEWATER	SOIL	CRUDE OIL	SLUDGE	OTHER:	ACID/BASE:	ICE/COOL	OTHER:	DATE
H0004-1	Bottom Composite	CG			X				X		9-15-03	15:16
-2	4 Well Composite	CG			X				X		9-15-03	15:45
-3	Stack pile Composite	CG			X				X		9-15-03	16:01

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, affiliates or successors arising out of or related to the performance of services furnished by Cardinal, regardless of whether such claim is based upon any of the above stated causes of liability.

Terms and Conditions: Interest will be charged on all accounts more than 30 days past due at the rate of 24% per annum from the original date of invoice, and all costs of collection, including attorney's fees.

Sampler Relinquished: _____ Date: _____ Received By: _____
 Time: _____
 Relinquished By: _____ Date: 9-15-03 Received By: (Lab Staff) _____
 Time: 16:32 Bruce A. Cook
 Delivered By: (Circle One) _____
 Sampler - UPS - Bus - Other: _____
 Sample Condition: Cool Intact
 Checked By: _____ (initials)
 Yes No Yes No

Phone Result: Yes No Add'l Phone #: _____
 Fax Result: Yes No Add'l Fax #: _____
 REMARKS: Fax copy to Rice

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

5
ETG I

JUNCTION BOX FINAL REPORT
SITE EXCAVATION INFORMATION

EME J-5-1

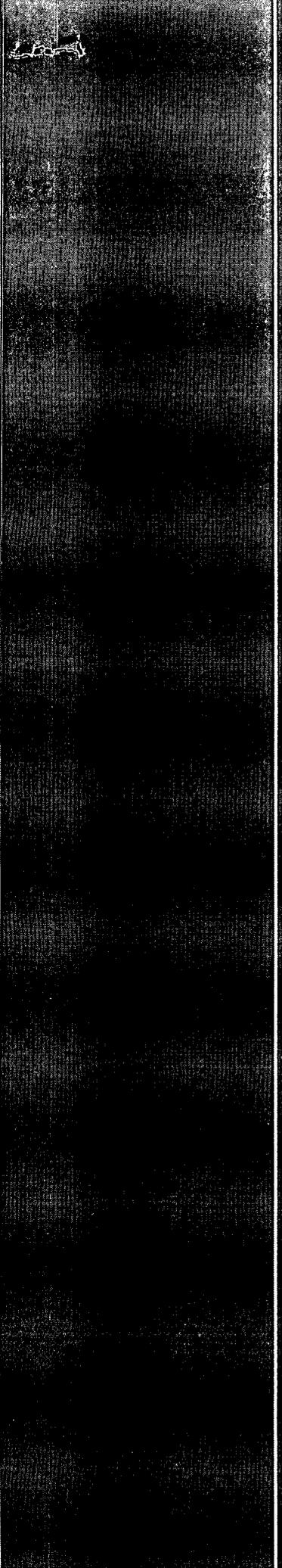
DATE DEPTH CL PID TPH SOIL COMPOSITION

LAB Tony Re Environmental

b.c.
b.c.
b.c.

DATE	DEPTH	CL	PID	TPH	SOIL COMPOSITION
7-15-03	N.W. 43'	149	10.5	16	MIX
	S.W. 17'	119	11.7	8	
	W. Well 7'	230	10.8	18	
	E. Well 7'	289	16.2	14	
	4 Well	193 144	31.2	12	
	Bottom	125 06 592	49.6	22	
	Stallpike	292 34	28.2	64	

Tony Re



Current Photodocumentation

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

EME I-9-1 (1R427-34)
Unit Letter I, Section 9, T21S, R36E



Facing Southwest

12/17/2012



Facing Northwest

12/17/2012

Hansen, Edward J., EMNRD

From: Katie Jones <kjones@riceswd.com>
Sent: Thursday, May 30, 2013 2:54 PM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder; Laura Pena
Subject: ROC - EME I-9-1 (1R427-34)
Attachments: ROC - EME I-9-1 (1R427-34) Field Notes.pdf; ROC - EME I-9-1 (1R427-34) Field Data.pdf

Mr. Hansen,

Attached are the field notes and a PDF summary of those field notes for the EME I-9-1 (1R427-34). Please contact Hack at (575)631-6432 if you have any questions or require any additional information.

Thank you.

Katie Jones

1

Vertical

ET6Z

Initial Report Vertical dig 14' at center north side W. to E.
SITE EXCAVATION INFORMATION

EMME I-9-1

DATE DEPTH CL PID TPH SOIL COMPOSITION

DATE	DEPTH	CL	PID	TPH	SOIL COMPOSITION
9-12-03	9'	1885			Little odor celicite Light Brown Sand
	10'	1329			no odor
	11'	1101			
	12'	929	12.1		
	13'	744	14.9		Light Brown Sand
	14'	573	12.4		

Gary Mack

(2)

(5' W)

ET6E

Letenil dis 14' North West 5' West from center W to E

SITE EXCAVATION INFORMATION

EME 2-9-1

DATE	DEPTH	CL	PID	TPH	SOIL COMPOSITION
9-20-03	9'	272			no odor calcic light brown
	10'	435			
	11'	482			
	12'	518	26.5		
	13'	224	28.6		
	14'	300	22.8		Light Brown Sand

3

515

ET6I

Latencil dis 12' South 5' from center N. to S.
SITE EXCAVATION INFORMATION

EME 2-9-1

DATE DEPTH CL PID TPH SOIL COMPOSITION

DATE	DEPTH	CL	PID	TPH	SOIL COMPOSITION
9-12-02	1'	28		no odor	Brown Sand
	2'	57			
	3'	86			Little Light Brown Sand
	4'	86			
	5'	148			
	6'	196			
	7'	651			
	8'	1284		Little odor	
	9'	1081			
	10'	834		no odor	
	11'	496			
	12'	362	20.4		

Jerry Stark

(4)

5' N

ET6I

Location North 4 + center 5' North running N. to S.
SITE EXCAVATION INFORMATION

EMS I-9.1

DATE DEPTH CL PID TPH SOIL COMPOSITION

DATE	DEPTH	CL	PID	TPH	SOIL COMPOSITION
9.15.03	1	61			Brown Sand
	2	61			} { }
	3	85			
	4	215			Little Light Brown Sand
	5	372			} { }
	6	386			
	7	455			
	8	377			} { }
	9	348			
	10	314			} { }
	11	314			
	12	250	14.7		

[Handwritten Signature]

