

1R - 427-58

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, June 19, 2013 8:41 AM
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 (1R427-58) Termination -ROC EME H-2 Site

**RE: Termination Request
for the Rice Operating Company's
EME H-2 Site
Unit Letter H, Section 2, T20S, R37E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-58) 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 June 12, 2013 (received June 14, 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 (1R427-58) 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

RECEIVED OCD

88240 JUN 14 P 2:05

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8883

June 12, 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 H-2 (1R427-58): UL/H, Sec. 2, 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 2002, ROC initiated work on the former H-2 junction box. The site is located in UL/H, Sec. 2, T20S, R37E. An updated groundwater survey indicates that there are no water sources within a mile radius and there is no groundwater in the area. An initial delineation was conducted on 10/16/02 and found minimal chloride impact and no visual TPH at this site and a hard caliche layer at 3.5 ft below ground surface. The site was then delineated using a backhoe to collect soil samples at regular intervals. Each sample was field titrated for chlorides, resulting in chloride concentrations that decreased with depth. Representative samples of the sidewalls and bottom were collected and sent to a commercial laboratory for analysis of chloride and TPH, resulting in a sidewall chloride concentration of 1,240 mg/kg and a concentration of gasoline range organics (GRO), a diesel range organics (DRO) and BTEX below detectable limits. The bottom sample resulted in a chloride concentration of 354 mg/kg and concentrations of GRO, DRO and BTEX below detectable limits. Due to the decline and shallow chloride impact, no excavation was required. A new, water proof junction box was installed at the site so no re-vegetations efforts are needed. The junction box has since been replaced with a concrete box.

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

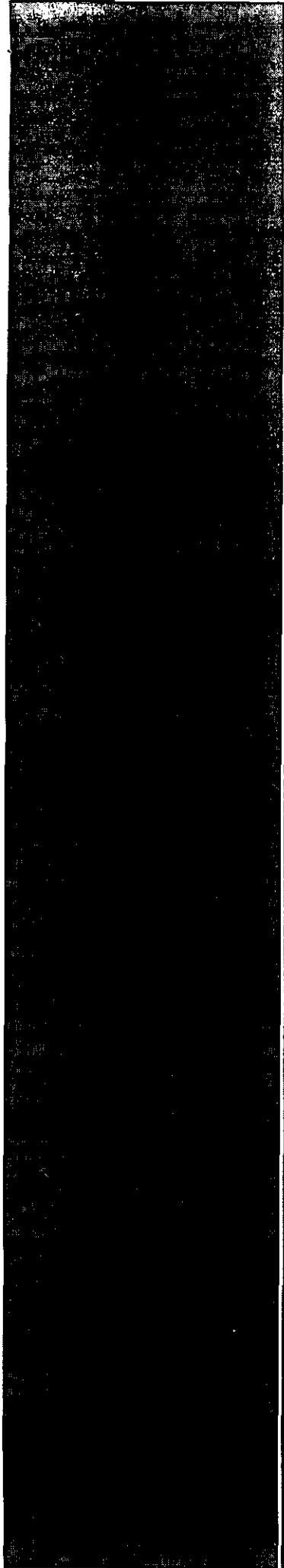
Please contact me at (575)393-9174 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,
RICE Operating Company

A handwritten signature in black ink, appearing to read "H. Conder", written in a cursive style.

Hack Conder
Environmental Manager

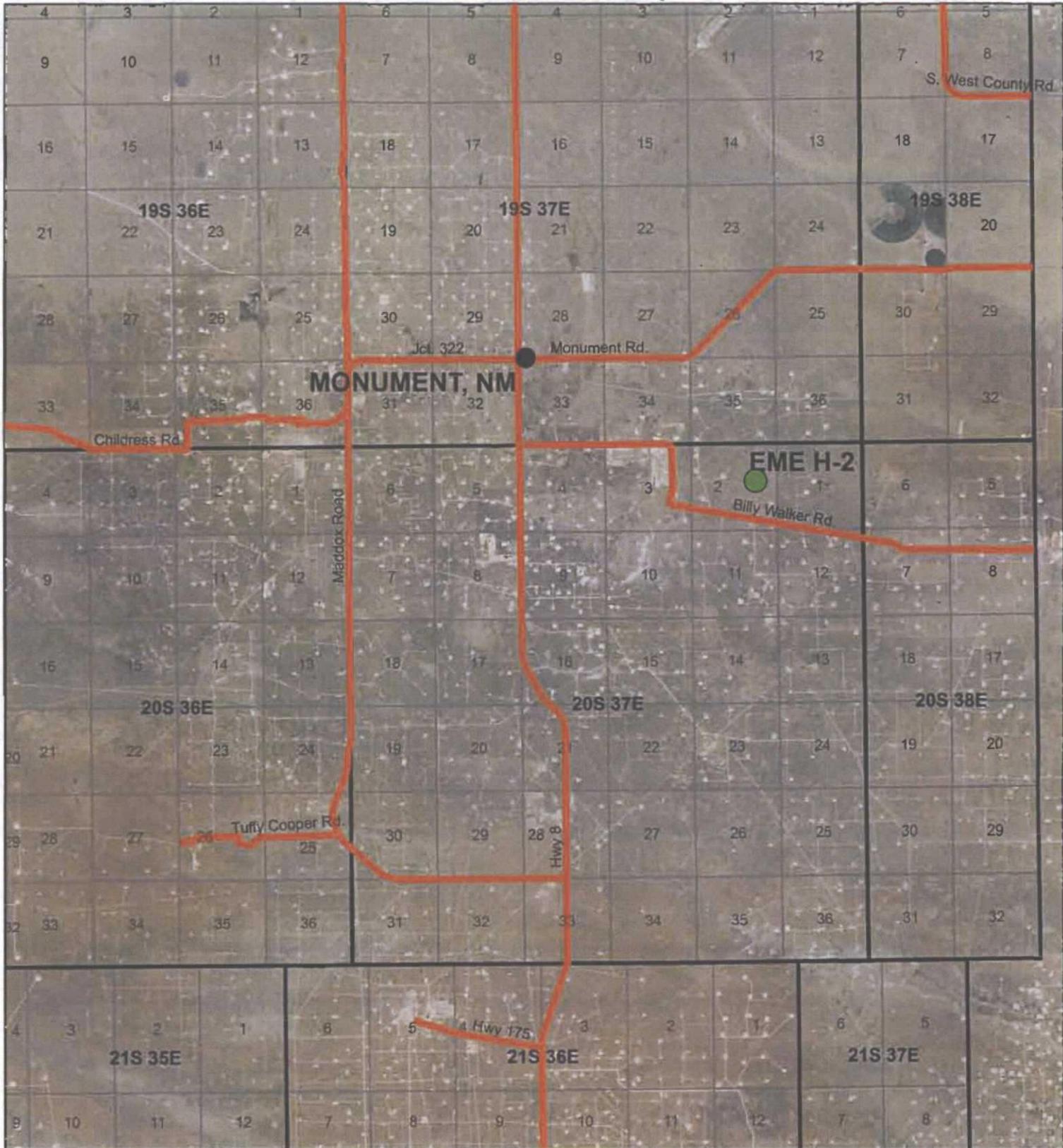
enclosures



Site Maps

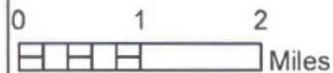
RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471

Site Location Map



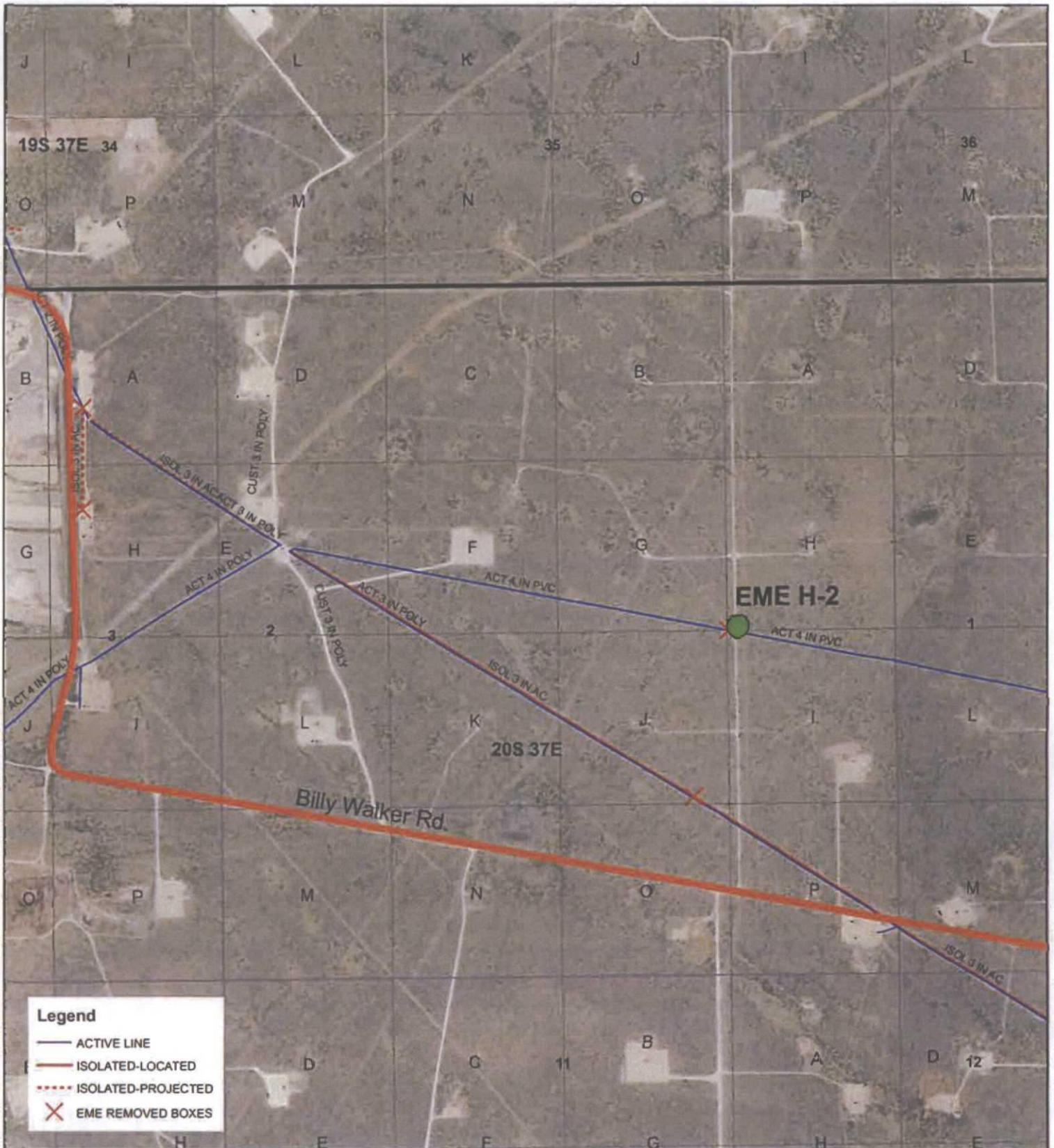
EME H-2 (1R427-58)

UL/H SECTION 2
T20S, R37E
LEA COUNTY, NM



Drawing date: 5/6/13 LS

Area Map



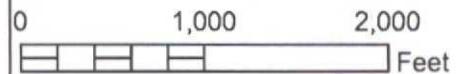
Legend

- ACTIVE LINE
- ISOLATED-LOCATED
- ISOLATED-PROJECTED
- X EME REMOVED BOXES

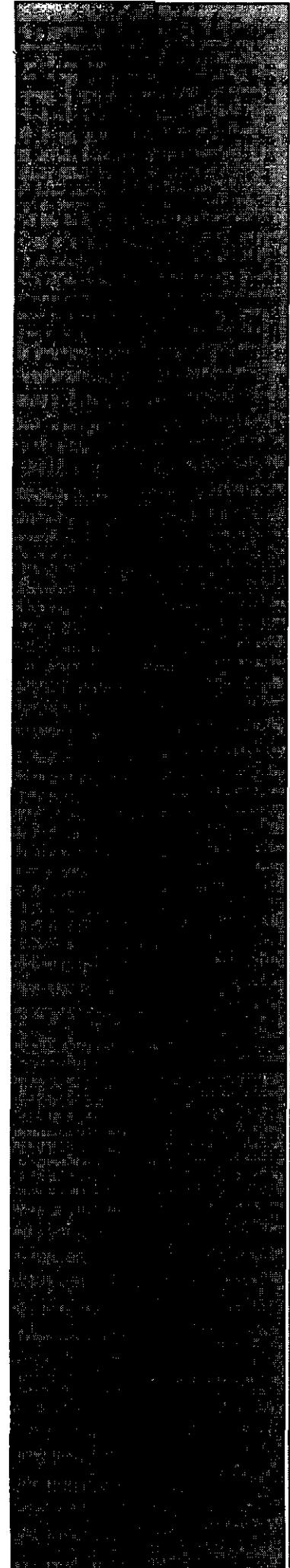


EME H-2 (1R427-58)

UL/H SECTION 2
T20S, R37E
LEA COUNTY, NM



Drawing date: 5/6/13 LS



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	H-2	H	2	20 S	37 E	Lea	5'	4'	6'

LAND TYPE: BLM _____ STATE X FEE LANDOWNER _____ OTHER _____

Depth to Groundwater None feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 10/16/2002 Date Completed 10/16/2002 OCD Witness No

Soil Excavated 0 cubic yards Excavation Length n/a Width n/a Depth 7' feet

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

FINAL ANALYTICAL RESULTS: Sample Date 10/16/2002 Sample Depth 7'

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	Benzene mg/kg	Toluene mg/kg	Ethyl Benzene mg/kg	Total Xylenes mg/kg	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SIDEWALLS	<0.025	<0.025	<0.025	<0.025	<10.0	<10.0	1240
BOTTOM	<0.025	<0.025	<0.025	<0.025	<10.0	<10.0	354
REMEDIATED	n/a	n/a	n/a	n/a	n/a	n/a	n/a

General Description of Remedial Action: ROC conducted an initial delineation on 10/16/02 and found minimal chloride impact and no visual TPH at this location. According to USGS, there is no groundwater below this site. The depth of the pipeline at the junction is 3' BGS and at 3.5' BGS, a hard caliche layer was found.

On 10/16/02, a backhoe was used to vertically delineate the junction further. At 7' BGS, a significant decline was observed with a field test of 350 ppm chlorides.

With the demonstrated decline and relatively shallow nature of chloride impact, no excavation was required here. The remaining impact should not be considered a threat to public health. A water-tight junction box has since been built at this location.

CHLORIDE FIELD TESTS

LOCATION	DEPTH	ppm
Vertical	3	4216
	3.5	1895
	5	1200
	7	350

cc: lab results

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

DATE 11-21-02 PRINTED NAME Kristin Farris

SIGNATURE Kristin Farris TITLE Environmental Projects Scientist

EME jct. H-2

ANALYTICAL REPORT

Prepared for:

LOGAN ANDERSON
RE ENVIRONMENTAL
P.O. BOX 13418
ODESSA, TX 79768

Project: Rice

PO#:

Order#: G0204786

Report Date: 10/18/2002

Certificates

US EPA Laboratory Code TX00158

ENVIRONMENTAL LAB OF TEXAS

SAMPLE WORK LIST

RE ENVIRONMENTAL
P.O. BOX 13418
ODESSA, TX 79768
366-0804

Order#: G0204786
Project:
Project Name: Rice
Location: H-2

The samples listed below were submitted to Environmental Lab of Texas and were received under chain of custody. Environmental Lab of Texas makes no representation or certification as to the method of sample collection, sample identification, or transportation/handling procedures used prior to the receipt of samples by Environmental Lab of Texas, unless otherwise noted.

<u>Lab ID:</u>	<u>Sample :</u>	<u>Matrix:</u>	<u>Date / Time</u> <u>Collected</u>	<u>Date / Time</u> <u>Received</u>	<u>Container</u>	<u>Preservative</u>
0204786-01	Vertical @ 7' (Bottom)	SOIL	10/16/02 16:00	10/17/02 8:00	4 oz glass	Ice
	<u>Lab Testing:</u> 8015M 8021B/5030 BTEX Chloride	Rejected: No		Temp: 2.5 C		
0204786-02	4 pt. Wall Comp. @ 4'	SOIL	10/16/02 16:00	10/17/02 8:00	4 oz glass	Ice
	<u>Lab Testing:</u> 8015M 8021B/5030 BTEX Chloride	Rejected: No		Temp: 2.5 C		

ANALYTICAL REPORT

LOGAN ANDERSON
 RE ENVIRONMENTAL
 P.O. BOX 13418
 ODESSA, TX 79768

Order#: G0204786
 Project:
 Project Name: Rice
 Location: H-2

Lab ID: 0204786-01
 Sample ID: Vertical @ 7' (Bottom)

8015M

<u>Method</u>	<u>Date</u>	<u>Date</u>	<u>Sample</u>	<u>Dilution</u>	<u>Analyst</u>	<u>Method</u>
<u>Blank</u>	<u>Prepared</u>	<u>Analyzed</u>	<u>Amount</u>	<u>Factor</u>		
		10/17/02	1	1	CK	8015M

Parameter	Result mg/kg	RL
GRO, C6-C12	<10.0	10.0
DRO, >C12-C35	<10.0	10.0
TOTAL, C6-C35	<10.0	10.0

Surrogates	% Recovered	QC Limits (%)	
1-Chlorooctane	84%	70	130
1-Chlorooctadecane	87%	70	130

8021B/5030 BTEX

<u>Method</u>	<u>Date</u>	<u>Date</u>	<u>Sample</u>	<u>Dilution</u>	<u>Analyst</u>	<u>Method</u>
<u>Blank</u>	<u>Prepared</u>	<u>Analyzed</u>	<u>Amount</u>	<u>Factor</u>		
0003474-02		10/18/02 12:11	1	25	CK	8021B

Parameter	Result mg/kg	RL
Benzene	<0.025	0.025
Ethylbenzene	<0.025	0.025
Toluene	<0.025	0.025
p/m-Xylene	<0.025	0.025
o-Xylene	<0.025	0.025

Surrogates	% Recovered	QC Limits (%)	
aaa-Toluene	83%	80	120
Bromofluorobenzene	95%	80	120

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

LOGAN ANDERSON
RE ENVIRONMENTAL
P.O. BOX 13418
ODESSA, TX 79768

Order#: G0204786
Project:
Project Name: Rice
Location: H-2

Lab ID: 0204786-02
Sample ID: 4 pt. Wall Comp. @ 4'

8015M

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
		10/17/02	1	1	CK	8015M

Parameter	Result mg/kg	RL
GRO, C6-C12	<10.0	10.0
DRO, >C12-C35	<10.0	10.0
TOTAL, C6-C35	<10.0	10.0

Surrogates	% Recovered	QC Limits (%)	
1-Chlorooctane	77%	70	130
1-Chlorooctadecane	75%	70	130

8021B/5030 BTEX

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
0003474-02		10/18/02 12:33	1	25	CK	8021B

Parameter	Result mg/kg	RL
Benzene	<0.025	0.025
Ethylbenzene	<0.025	0.025
Toluene	<0.025	0.025
p/m-Xylene	<0.025	0.025
o-Xylene	<0.025	0.025

Surrogates	% Recovered	QC Limits (%)	
aaa-Toluene	73%	80	120
Bromofluorobenzene	91%	80	120

Approval: Raland K Tuttle 10-21-02
Raland K. Tuttle, Lab Director, QA Officer Date
Celey D. Keene, Org. Tech. Director
Jeanne McMurrey, Inorg. Tech. Director
Sandra Biezugbe, Lab Tech.
Sara Molina, Lab Tech.

ENVIRONMENTAL LAB OF TEXAS
ANALYTICAL REPORT

LOGAN ANDERSON
RE ENVIRONMENTAL
P.O. BOX 13418
ODESSA, TX 79768

Order#: G0204786
Project:
Project Name: Rice
Location: H-2

Lab ID: 0204786-01
Sample ID: Vertical @ 7' (Bottom)

Test Parameters

<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Dilution Factor</u>	<u>RL</u>	<u>Method</u>	<u>Date Analyzed</u>	<u>Analyst</u>
Chloride	354	mg/kg	1	20	9253	10/18/02	SB

Lab ID: 0204786-02
Sample ID: 4 pt. Wall Comp. @ 4'

Test Parameters

<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Dilution Factor</u>	<u>RL</u>	<u>Method</u>	<u>Date Analyzed</u>	<u>Analyst</u>
Chloride	1240	mg/kg	1	20	9253	10/18/02	SB

Approval: Raland K. Tuttle 10-21-02
Raland K. Tuttle, Lab Director, QA Officer Date
Celey D. Keene, Org. Tech. Director
Jeanne McMurrey, Inorg. Tech. Director
Sandra Biezugbe, Lab Tech.
Sara Molina, Lab Tech.

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

8015M

Order#: G0204786

<i>BLANK</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg		0003475-02			<10.0		
<i>CONTROL</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg		0003475-03		952	913	95.9%	
<i>CONTROL DUP</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg		0003475-04		952	973	102.2%	6.4%
<i>SRM</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg		0003475-05		1000	915	91.5%	

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

8021B/5030 BTEX

Order#: G0204786

BLANK		SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene-mg/kg			0003474-02			<0.025		
Ethylbenzene-mg/kg			0003474-02			<0.025		
Toluene-mg/kg			0003474-02			<0.025		
p/m-Xylene-mg/kg			0003474-02			<0.025		
o-Xylene-mg/kg			0003474-02			<0.025		
MS		SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene-mg/kg			0204789-24	0	0.12	0.092	76.7%	
Ethylbenzene-mg/kg			0204789-24	0	0.12	0.096	80.0%	
Toluene-mg/kg			0204789-24	0	0.12	0.095	79.2%	
p/m-Xylene-mg/kg			0204789-24	0	0.23	0.202	87.8%	
o-Xylene-mg/kg			0204789-24	0	0.12	0.096	80.0%	
MSD		SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene-mg/kg			0204789-24	0.092	0.12	0.087	72.5%	5.6%
Ethylbenzene-mg/kg			0204789-24	0.096	0.12	0.090	75.0%	6.5%
Toluene-mg/kg			0204789-24	0.095	0.12	0.091	75.8%	4.3%
p/m-Xylene-mg/kg			0204789-24	0.202	0.23	0.192	83.5%	5.1%
o-Xylene-mg/kg			0204789-24	0.096	0.12	0.092	76.7%	4.3%
SRM		SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene-mg/kg			0003474-05		0.1	0.097	97.0%	
Ethylbenzene-mg/kg			0003474-05		0.1	0.100	100.0%	
Toluene-mg/kg			0003474-05		0.1	0.102	102.0%	
p/m-Xylene-mg/kg			0003474-05		0.2	0.211	105.5%	
o-Xylene-mg/kg			0003474-05		0.1	0.100	100.0%	

ENVIRONMENTAL LAB OF TEXAS

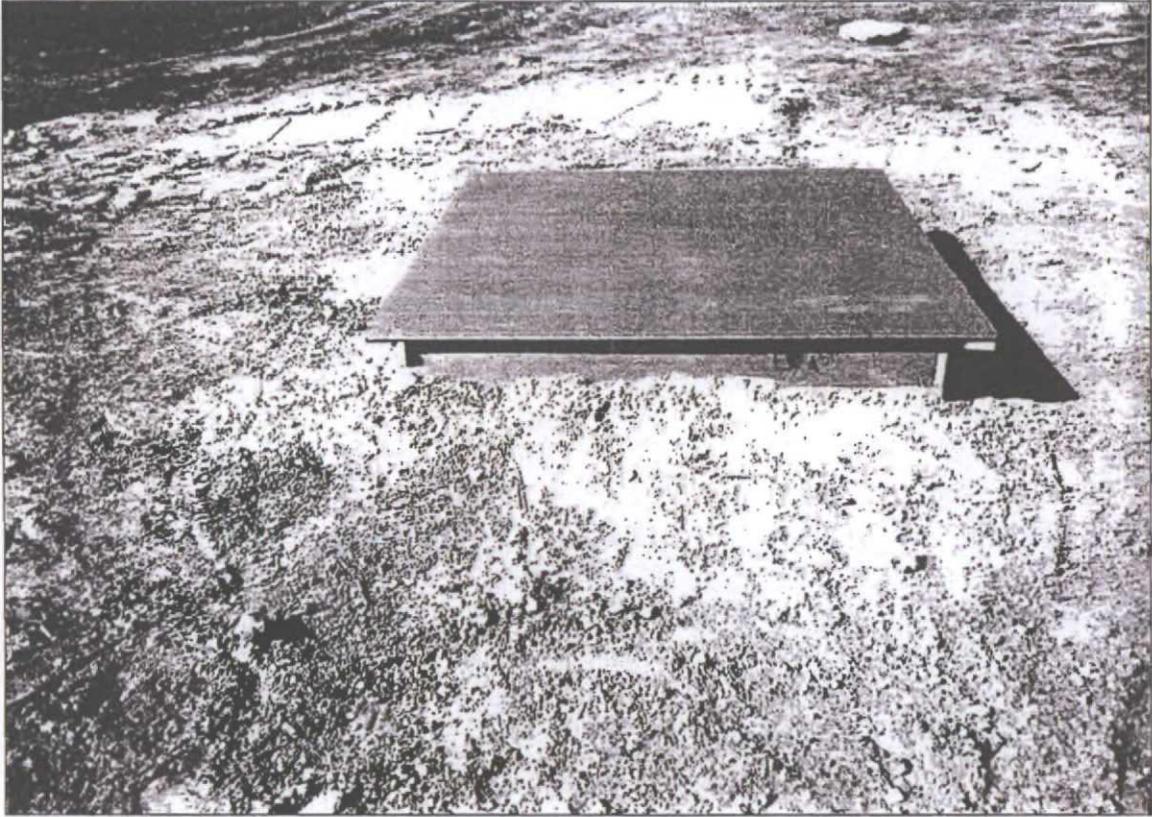
QUALITY CONTROL REPORT

Test Parameters

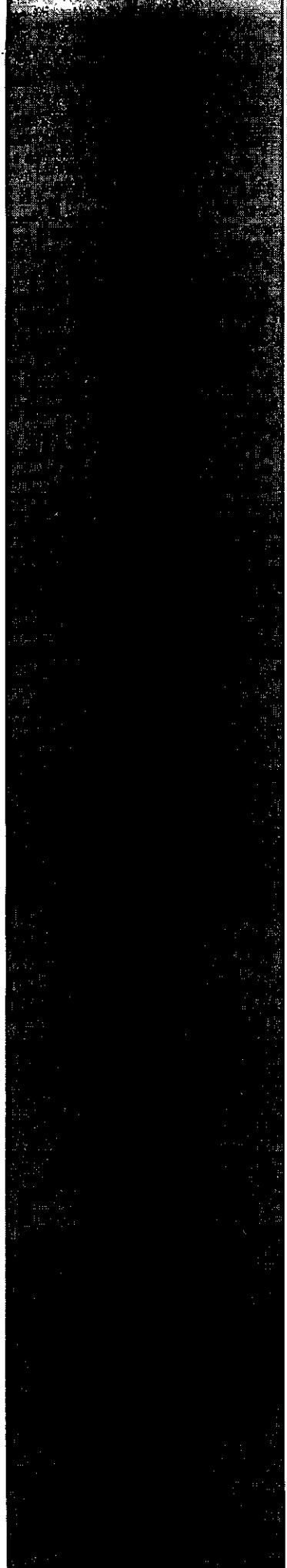
Order#: G0204786

BLANK	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg		0003483-01			<20.0		
MS	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg		0204783-01	14200	10000	24100	99.%	
MSD	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg		0204783-01	14200	10000	24300	101.%	0.8%
SRM	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg		0003483-04		5000	4960	99.2%	

EME H-2 jct. box upgrade



new junction box



Current Photodocumentation

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

EME H-2 (1R427-58)

UL/H, Section 2, T20S, R37E



Facing east

3/26/2013



Facing south

3/26/2013