

1R - 427-233

**APPROVALS**  
& 11.12.13 REPORT

**YEAR(S):**

20 ~~13~~ 14

**Lowe, Leonard, EMNRD**

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**From:** Lowe, Leonard, EMNRD  
**Sent:** Tuesday, April 01, 2014 9:14 AM  
**To:** Hack Conder (hconder@riceswd.com)  
**Cc:** kjones@riceswd.com  
**Subject:** Approved Termination Request (1R-427-233) - EME Cooper 'E' EOL  
  
**Importance:** High

**Termination Request Approved  
for the EME Cooper 'E' EOL (1R427-233)  
Unit Letter A Section 4, T20S, R37E, NMPM, Lea County, New Mexico**

Dear Mr. Conder:

The New Mexico Oil Conservation Division (OCD) has received RICE Environmental 's Request to terminate the above-referenced site, dated November 12, 2013. The termination request is acceptable to the OCD.

The above-referenced report, submitted in accordance with 19.15.29 NMAC (Rule 29; formally, Rule 116), indicates that Rice Environmental has met the requirements of 19.15.29 NMAC; therefore, the OCD approves the report and hereby notifies you that the remediation plan (1R-427-233) 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 505-476-3492.

**Leonard Lowe**

Environmental Engineer

[Environmental Bureau]

Oil Conservation Division/Energy Minerals and Natural Resources Department

1220 South St. Frances

Santa Fe, New Mexico 87004

Office: 505-476-3492

E-mail: [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us)

D.2

Rice Environmental Consulting & Safety

P.O. Box 2948, Hobbs, NM 88241

Phone 575.393.2967

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 9109

**November 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 Cooper 'E' EOL (1R427-233): UL/A, Sec. 4, T20S, R37E  
RICE Operating Company – Eunice Monument Eumont (EME) SWD System

Mr. Hansen:

RICE Operating Company (ROC) has retained Rice Environmental Consulting and Safety (RECS) to address potential environmental concerns at the above-referenced site in the EME Salt Water Disposal (SWD) system. ROC is the service provider (agent) for the EME 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 2006, ROC initiated work on the former EME Cooper 'E' EOL junction box. The site is located in UL A, Sec. 4, T20S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 27 +/- feet. The site was delineated using a backhoe to form a 25x20x12-ft deep excavation and soil samples were screened at regular intervals for both hydrocarbons and chlorides. Each sample was field titrated for chlorides and screened for TPH, resulting in concentrations that relented with depth. The excavated soil was blended on site and representative samples of the sidewalls, bottom and backfill were sent to a commercial laboratory for analysis, resulting in a sidewalls chloride concentration of 528 mg/kg, a bottom chloride concentration of 528 mg/kg and a remediated backfill chloride concentration of 944 mg/kg. Concentrations of gasoline range organics (GRO) and diesel range organics (DRO) were below detectable limit throughout. The excavation was backfilled with the excavated soil to 2 ft below ground surface (bgs). The remaining excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area. On 2/2/2007, the site was seeded with a blend of native vegetation. A junction box is no longer needed at this site.

To further investigate the depth of chloride presence, a soil bore was initiated on September 25, 2013 at 11-ft northeast of the former junction box site. The boring was advanced to a depth of 24-ft below bgs with soil samples collected every 3 ft. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in concentrations that decreased with depth. The 9-ft and 24-ft samples were sent to a commercial laboratory for

## Rice Environmental Consulting & Safety

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P.O. Box 2948, Hobbs, NM 88241  
Phone 575.393.2967

analysis. The 9-ft sample resulted in a chloride concentration of 656 mg/kg and concentrations of GRO and DRO below detectable limits. The 24-ft sample resulted in a chloride concentration of 96 mg/kg and concentrations of GRO and DRO below detectable limit. The entire bore hole was plugged with bentonite to ground surface.

Vegetation has rebounded at this site; 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 junction box site location map, area map, final report, laboratory analysis, chloride graph, excavation cross-section, photodocumentation, delineation notes, soil bore plat, log, soil bore installation laboratory analysis and current documentation 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)393-2967 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,



Laura Flores  
Project Manager  
RECS

Enclosures



## Site and Area Maps

**RICE Environmental Consulting and Safety (RECS)**  
P.O. Box 2948, Hobbs, NM 88241  
Phone 575.393.2967



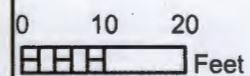
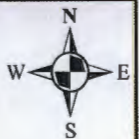
# SITE MAP



## EME Cooper 'E' EOL

1R427-233  
UL/A Sec. 4  
T20S-R37E

DGW 27'



Drawing date: 10/22/2013 JS



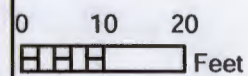
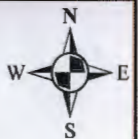
# AREA MAP



**EME**  
**Cooper 'E' EOL**

1R427-233  
UL/A Sec. 4  
T20S-R37E

DGW 27'



Drawing date: 10/22/2013 JS



# Junction Box Report

RICE Environmental Consulting and Safety (RECS)  
P.O. Box 2948, Hobbs, NM 88241  
Phone 575.393.2967



RICE OPERATING COMPANY  
JUNCTION BOX FINAL REPORT

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	NEW BOX DIMENSIONS - FEET		
EME	Cooper 'E' EOL	A	4	20S	37E	Lea	Length	Width	Depth
							no box--jct. eliminated		

LAND TYPE: BLM \_\_\_\_\_ STATE \_\_\_\_\_ FEE LANDOWNER Jimmie T. Cooper OTHER \_\_\_\_\_

Depth to Groundwater 27 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 12/27/2006 Date Completed 2/2/2007 NMOCD Witness no

Soil Excavated 222 cubic yards Excavation Length 25 Width 20 Depth 12 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 1/4/2007, 1/5/2007 Sample Depth 12 ft

5-point composite sample of bottom and 4-point composite sample of excavation sidewalls. TPH and chloride laboratory test results completed by using an approved laboratory 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.	2.1	<10.0	<10.0	528
BOTTOM COMP.	0.8	<10.0	<10.0	528
BACKFILL	4.4	<10.0	<10.0	944

LOCATION	DEPTH (ft)	ppm
4-wall comp.	n/a	417
bottom comp.	12	145
backfill comp.	n/a	898

General Description of Remedial Action:

This junction was eliminated with the pipeline replacement program. After the box lumber was removed, a backhoe was used to collect soil samples at regular intervals. Chloride field tests and organic vapor readings using a PID were performed on each sample throughout the 25 x 20 x 12-ft-deep excavation. Composite samples from the final excavation were collected for laboratory analysis and confirmed that hydrocarbon was not detected. Chloride concentrations exhibited a trend of decline with depth. The excavated soil was blended on site and returned to the excavation. 36 cubic yards of clean topsoil was imported to fill the remaining 2 ft of the excavation. The topsoil was contoured to the surrounding terrain and seeded with a blend of native vegetation. The seed has been watered and will be monitored for growth.

enclosures: photos, lab results, PID field screenings, excavation cross-section, chloride graph

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

SITE SUPERVISOR Darnell Mitchell SIGNATURE \_\_\_\_\_ COMPANY RICE Operating Company

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE Kristin Farris Pope

DATE 7/3/2007 TITLE Project Scientist



# ARDINAL LABORATORIES

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

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

# COPY

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

Receiving Date: 01/05/07  
Reporting Date: 01/08/07  
Project Number: NOT GIVEN  
Project Name: NOT GIVEN  
Project Location: EME AMERADA COOPER E

Sampling Date: 01/04/07 & 01/05/07  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: BC  
Analyzed By: BC/HM

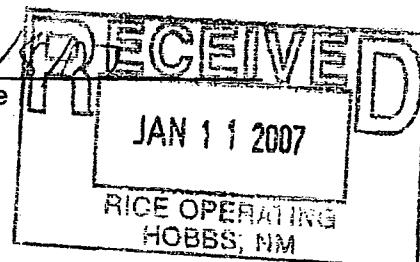
LAB NUMBER	SAMPLE ID	GRO (C <sub>6</sub> -C <sub>10</sub> ) (mg/Kg)	DRO (C <sub>10</sub> -C <sub>28</sub> ) (mg/Kg)	CI* (mg/Kg)
		01/07/07	01/07/07	01/08/07
H11979-1	BOTTOM 5 PT. COMP.	<10.0	<10.0	528
H11979-2	4 WALL COMP.	<10.0	<10.0	528
H11979-3	BLENDED BACKFILL	<10.0	<10.0	944
Quality Control		749	732	510
True Value QC		800	800	500
% Recovery		93.6	91.5	102
Relative Percent Difference		2.6	2.0	5.9

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI: Std. Methods 4500-CI'B

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

Chemist

Date



H11979

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.



## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page        of       

**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 collections, including attorney's fees.

Sampler Relinquished:		Date:	Received By:	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No
		Time:		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No
Relinquished By:		Date: 1-5-07	Received By: (Lab Staff)	REMARKS:
Delivered By: (Circle One)		Time: 4:06	Checked By:	2 mail TO Ros Rascome
Sampler - UPS - Bus - Other:		Sample Condition Temp. °C Intact?	Checked By: (Initials)	
		Cool <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	(Initials)	

Cardinal cannot accept verbal changes. Please fax written changes to (325) 673-7020.

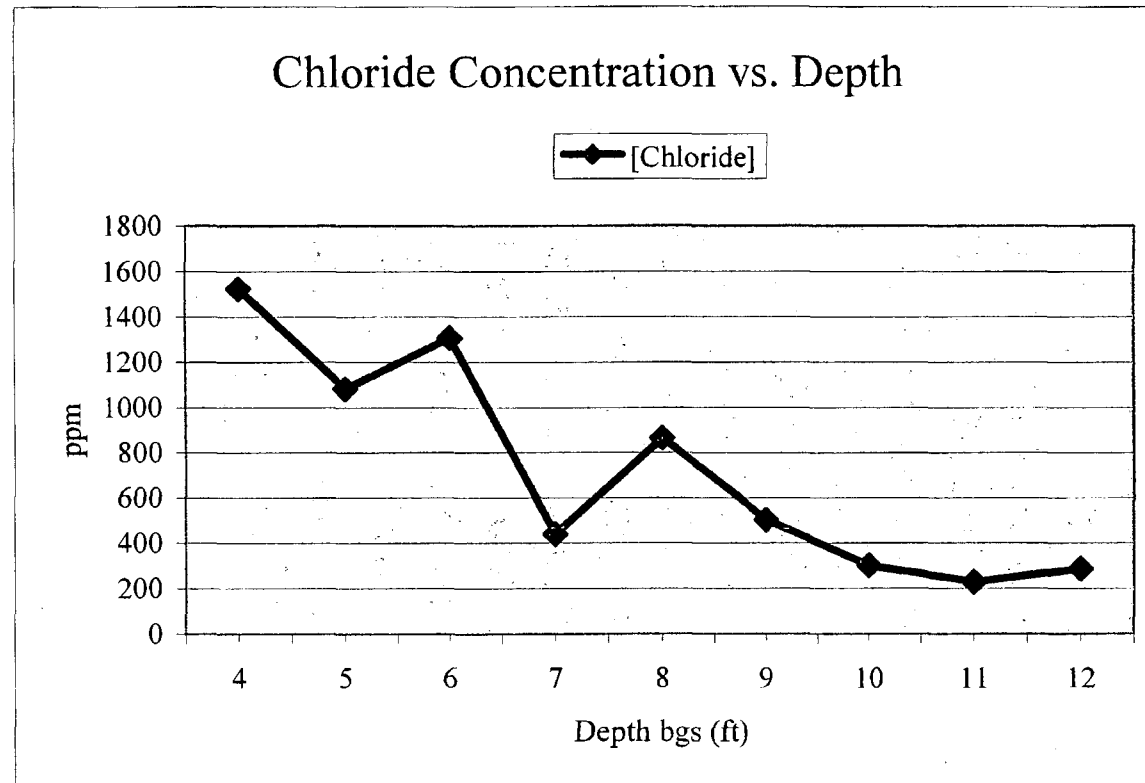
# EME Cooper 'E' EOL

unit 'A', Sec. 4, T20S, R37E

15 ft NORTH of junction

Depth bgs (ft)	[Cl <sup>-</sup> ] ppm
4	1524
5	1082
6	1307
7	440
8	865
9	503
10	302
11	229
12	287

Groundwater = 27 ft

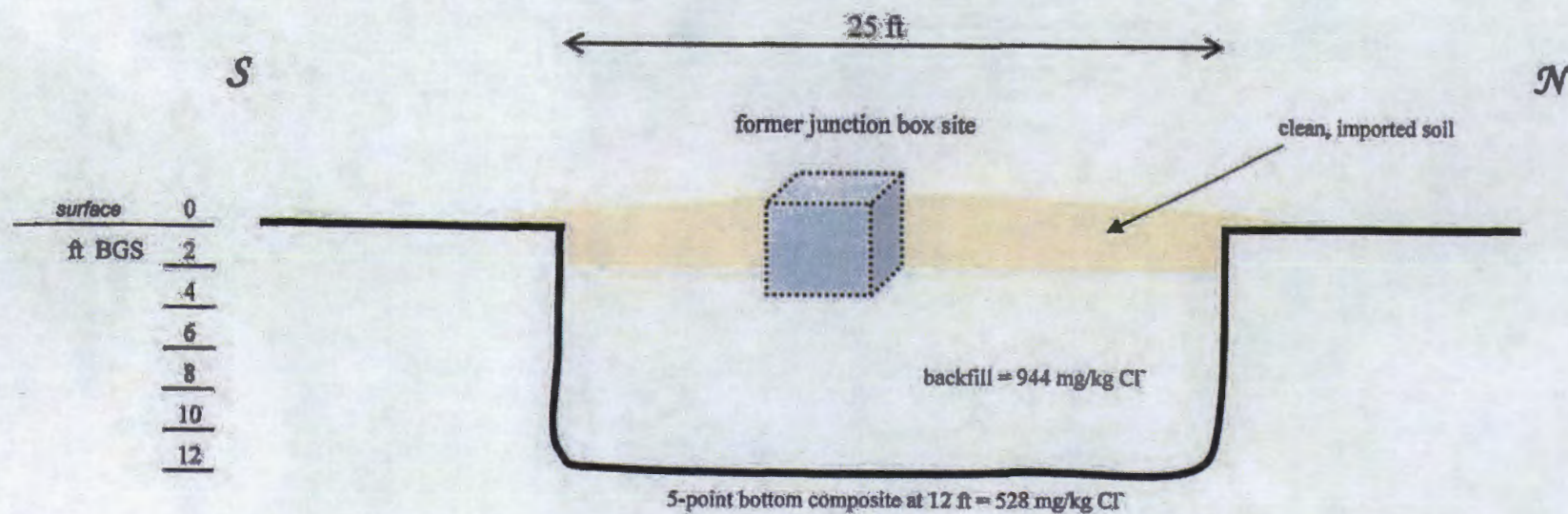
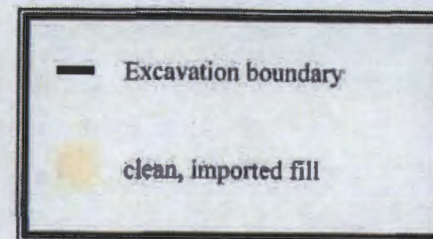




# EME Cooper 'E' EOL

25 x 20 x 12-ft-deep

Excavation Cross-Section





## EME Cooper 'E' EOL

Unit 'A', Sec. 4, T20S, R37E



beginning backhoe sample collection at former box site 12/27/2006



compacting backfill in 25 x 20 x 12 ft excavation 1/29/2007



spreading clean, imported soil on top of backfilled site 1/30/2007



seeding disturbed surface of backfilled site 2/2/2007

5	198	3.6
---	-----	-----

**West Wall Comp.**

cl-	810
pid	2.3

Soil	Water	CF	AgNO <sub>3</sub>	CL <sup>-</sup>	PID
10.4	31.4	2.98	0.14	417	2.1

MAKE SURE YOU ARCHIVE ALL FINAL SAMPLES

Signature Donnelly H. Hall

Date 1-5-07

COPY

Soil	Water	CF	AgNO3	CL-	PID
10.5	30.6	2.91	.05	145	0.8

Soil	Water	CF	AgNO3	CL-	PID
10.4	33.4	3.21	0.28	898	4.4

## MAKE SURE YOU ARCHIVE ALL SAMPLES

**Notes:**

[illegible]



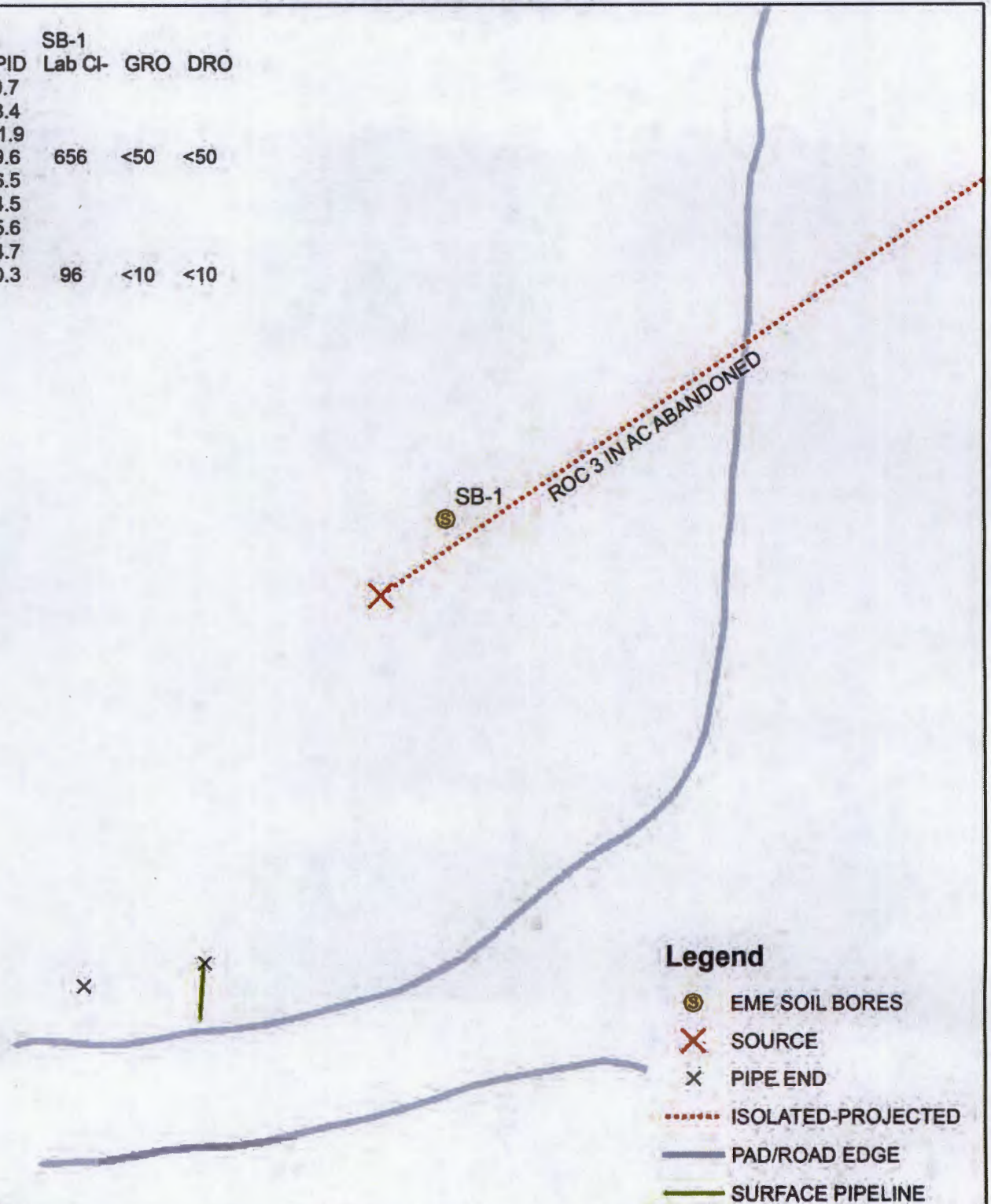
# Soil Bore Installation Documentation

**RICE Environmental Consulting and Safety (RECS)**  
P.O. Box 2948, Hobbs, NM 88241  
Phone 575.393.2967



# Soil Bore Installation

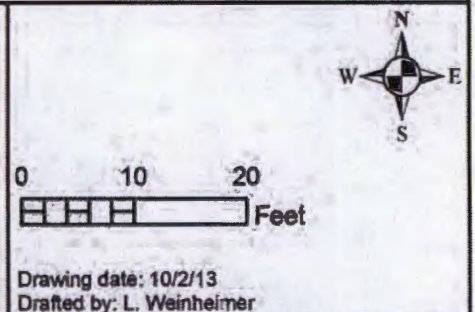
Depth	CI-	PID	SB-1 Lab CI-	GRO	DRO
SS	84	0.7			
3	543	8.4			
6	606	11.9			
9	633	9.6	656	<50	<50
12	353	6.5			
15	454	4.5			
18	425	5.6			
21	280	4.7			
24	184	0.3	96	<10	<10



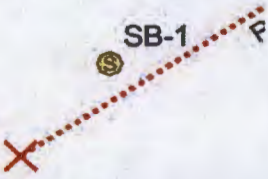

DGW: 27 ft



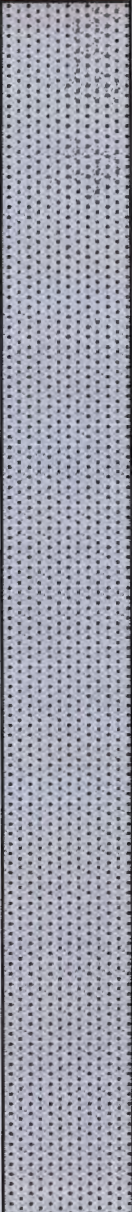



**EME**  
**COOPER 'E' EOL**  
**1R427-233**  
 UL A SECTION 4  
 T-20-S R-37-E  
 LEA COUNTY, NM





Logger:	Edward Cesaro			
Driller:	Harrison & Cooper, Inc.			
Drilling Method:	Air Rotary		Project Name:	Well ID:
Start Date:	9/25/2013		EME Cooper 'E' EOL	SB-1
End Date:	9/25/2013			
Comments: SB-1 is located 11 ft northeast of the former junction box site. All samples were from cuttings.		Location: UL/A sec. 4 T20S R37E		
DRAFTED BY: L. Weinheimer		Lat: 32°36'31.193"N	County: Lea	
TD = 24 ft      GW = 27 ft		Long: 103°15'5.586"W	State: NM	

Depth (feet)	Chloride field tests	LAB	PID	Description	Lithology	Well Construction
				BROWN SAND		
SS	84		0.7			
3 ft	543		8.4	CALICHE WITH ROCK		
6 ft	606		11.9			
9 ft	633	CI-656	9.6			
		GRO <50				
		DRO <50				
12 ft	353		6.5			
15 ft	454		4.5			
18 ft	425		5.6			
21 ft	280		4.7			
24 ft	184	CI-96	0.3			
		GRO <10				
		DRO <10				



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

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October 01, 2013

KATIE JONES

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: EME COOPER 'E' EOL

Enclosed are the results of analyses for samples received by the laboratory on 09/25/13 16:15.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Lab Director/Quality Manager

**Analytical Results For:**

 Rice Operating Company  
 KATIE JONES  
 112 W. Taylor  
 Hobbs NM, 88240  
 Fax To: (575) 397-1471

Received:	09/25/2013	Sampling Date:	09/25/2013
Reported:	10/01/2013	Sampling Type:	Soil
Project Name:	EME COOPER 'E' EOL	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: SB #1 9' (H302339-01)**

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	656	16.0	09/27/2013	ND	400	100	400	3.92		
TPH 8015M			mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<50.0	50.0	09/27/2013	ND	195	97.5	200	11.3		
DRO >C10-C28	<50.0	50.0	09/27/2013	ND	185	92.3	200	5.20		
Surrogate: 1-Chlorooctane	79.9 %	65.2-140								
Surrogate: 1-Chlorooctadecane	89.5 %	63.6-154								

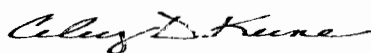
**Sample ID: SB #1 24' (H302339-02)**

Chloride, SM4500Cl-B			mg/kg Analyzed By: AP							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	96.0	16.0	09/27/2013	ND	400	100	400	3.92		
TPH 8015M			mg/kg Analyzed By: MS							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	09/27/2013	ND	195	97.5	200	11.3		
DRO >C10-C28	<10.0	10.0	09/27/2013	ND	185	92.3	200	5.20		
Surrogate: 1-Chlorooctane	80.0 %	65.2-140								
Surrogate: 1-Chlorooctadecane	86.2 %	63.6-154								

Cardinal Laboratories

\* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



**Notes and Definitions**

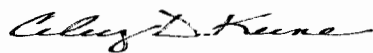
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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Cardinal Laboratories

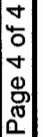
\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]

Relinquished By: <i>[Signature]</i>		Date: <i>9-25-13</i>	Received By: <i>[Signature]</i>	Phone Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Phone #:
Time: <i>4:15</i>				Fax Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Fax #:
Relinquished By:		Date:	Received By:	REMARKS:	
		Time:		email results	
Delivered By: (Circle One)		Sample Condition		hconder@rice-ecs.com; Lweinheimer@rice-ecs.com;	
Sampler - UPS - Bus - Other:		Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/>	CHECKED BY: <i>[Signature]</i>	kjones@riceswd.com; Lpena@riceswd.com;	
		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		knorman@rice-ecs.com; ecesareo@rice-ecs.com	

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

#54

# RICE ENVIRONMENTAL CONSULTING & SAFETY

122 West Taylor Hobbs, NM 88240  
PHONE: (505) 393-9174 FAX: (505) 397-1471  
PID METER CALIBRATION & FIELD REPORT FORM

CK.	<input checked="" type="checkbox"/>	MODEL: PGM 7300	SERIAL NO: 590-000508
MODEL	<input type="checkbox"/>	MODEL: PGM 7300	SERIAL NO: 590-000504
NO.	<input type="checkbox"/>	MODEL: PGM 7320	SERIAL NO: 592-903318
	<input type="checkbox"/>	MODEL: PGM 7300 X	SERIAL NO: 590-902553

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT # IAM-248-100-1	EXPIRATION DATE: 8-15-16
METER READING ACCURACY: 100PPM	

ACCURACY : +/- 2%

<b>COMPANY</b>
ROC

SITE	UNIT	SECTION	TOWN SHIP	RANGE
EME COOPER "E" E.O.L.	A	4	20-S	37-E

SAMPLE ID	PID	SAMPLE ID	PID
SB#1 SURFACE	0.7		
SB#1 3'	8.4		
SB#1 6'	11.9		
SB#1 9'	9.6		
SB#1 12'	6.5		
SB#1 15'	4.5		
SB#1 18'	5.6		
SB#1 21'	4.7		
SB#1 24'	0.3		

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

SIGNATURE:

*Shirley Carver*

DATE: 9-25-13



# Current Photodocumentation

**RICE Environmental Consulting and Safety (RECS)**  
P.O. Box 2948, Hobbs, NM 88241  
Phone 575.393.2967



**EME Cooper 'E' EOL (1R427-233)**  
Unit Letter A, Section 4, T20S, R37E



Facing east

10/15/2013



Facing south

10/15/2013