1R - 427-185

REPORTS

DATE:

10-15-13

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 8982

October 15, 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 Burleson St A-26 EOL (1R427-185): UL/M, Sec. 26, T19S, R36E
RICE Operating Company – Eunice Monument Eumont (EME) 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 and Previous Work
In 2004, ROC initiated work on the former Burleson St A-26 EOL junction box. The site is located in UL M, Sec. 26, T19S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 50 +/- feet. The site was delineated using a backhoe to form a 30x15x12 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 low concentrations for chlorides and TPH. The excavated soil was blended on site and 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 261 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 260 mg/kg and concentrations of GRO and DRO below detectable limits. The remediated backfill resulted in a chloride concentration of 223 mg/kg and concentrations of GRO and DRO below detectable limits. The excavation was backfilled with the remediated backfill to ground surface and contoured to the surrounding area. On 3/18/2005, the site was seeded with a blend of native vegetation. Vegetation has rebounded at this site; vegetation will act as an evapo-transpiration barrier that will 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. A new watertight junction box was built 20 ft southwest of this site.

The junction box site location map, area map, final report, photodocumentation, laboratory analysis, PID sheet 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 Hack Conder or me at (575)393-2967 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,
RICE Operating Company

L Flores

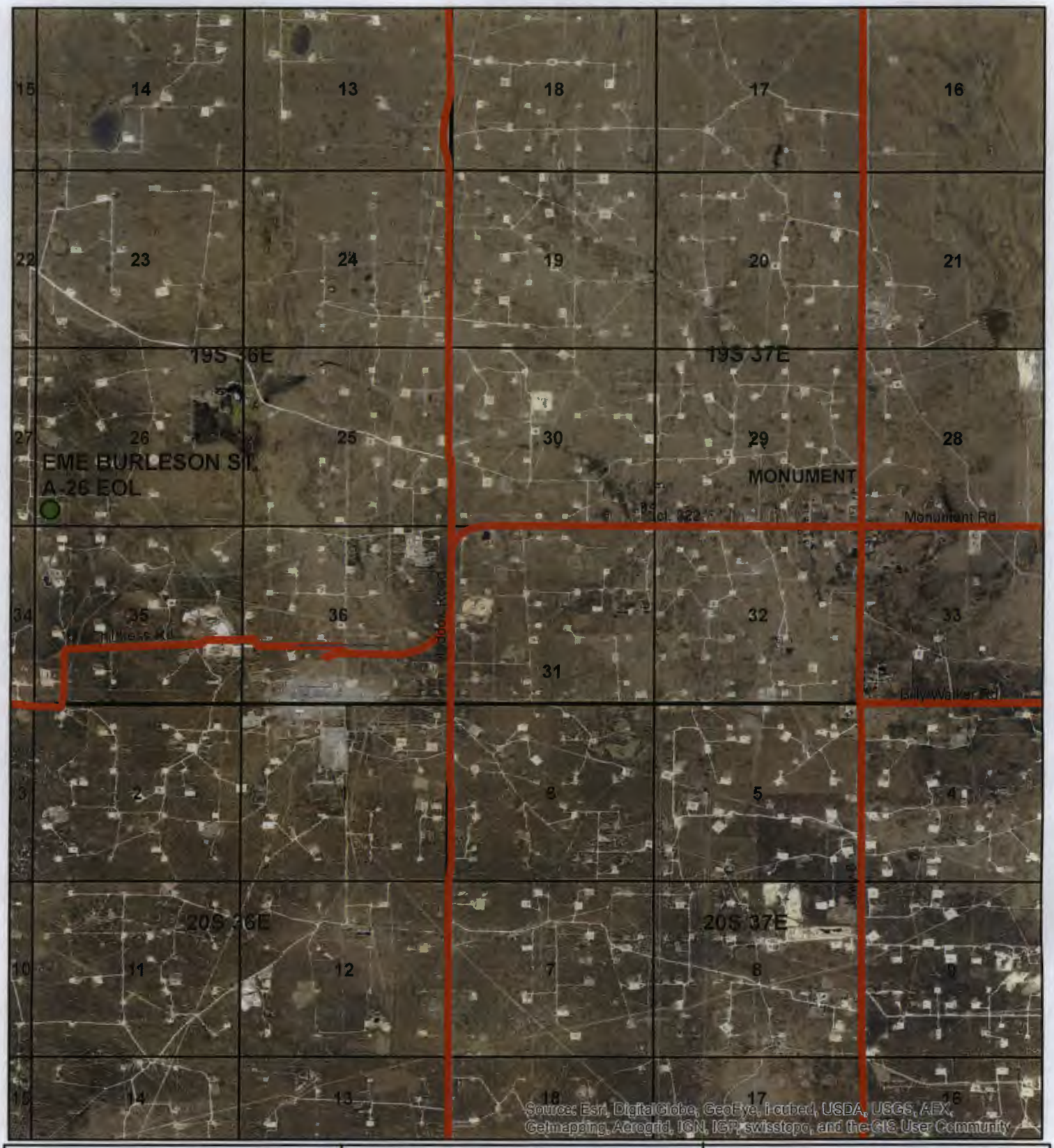
Laura Flores
Environmental Project Assistant Manager

enclosures

Site Maps

RICE *Operating Company* (ROC)
419 West Cain Hobbs, NM 88240
Phone: (575) 393-2967 Fax: (575) 393-0293

SITE MAP



RICE ENVIRONMENTAL RECS CONSULTING & SAFETY, LLC

EME Burleson St. A-26 EOL

1R427-185
UL/M Sec. 26
T19S-R36E
LEA COUNTY, NM

N
W E
S

0 3,100 6,200
Feet

Drawing date: 10/7/2013 JS

AREA MAP

RICE ENVIRONMENTAL RECS CONSULTING & SAFETY, LLC

EME Burleson St.
A-26 EOL

1R427-185
UL/M Sec. 26
T19S-R36E
LEA COUNTY, NM

N
W E
S

0 10 20
Feet

Drawing date: 10/7/2013 JS

Junction Box Report

RICE *Operating Company* (ROC)
419 West Cain Hobbs, NM 88240
Phone: (575) 393-2967 Fax: (575) 393-0293

RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
							Length	Width	Depth
EME	Burleson St. A-26 EOL	M	26	19S	36E	Lea	moved 20 ft southwest		

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

Depth to Groundwater 50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 10/13/2004 Date Completed 3/1/2005 NMOCD Witness no

Soil Excavated 200 cubic yards Excavation Length 30 Width 15 Depth 12 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 2/16/2005 Sample Depth 12 ft

Procure 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 lab and testing procedures pursuant to NMOCD guidelines.

Sample Location	PID ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
4-WALL COMP.	0.1	<10.0	<10.0	261
BOTTOM COMP.	0.1	<10.0	<10.0	260
REMED. BACKFILL	0.1	<10.0	<10.0	223

CHLORIDE FIELD TESTS

LOCATION	DEPTH (ft)	ppm
4-wall comp.	n/a	296
bottom comp.	12	276
remed. comp.	n/a	307

General Description of Remedial Action:

This junction was moved 20 ft southwest. The box lumber was removed from the former location and the site was NORM decontaminated. The location was then delineated using a backhoe while PID screenings and chloride field tests were conducted at regular intervals. All PID readings were 0.1 ppm and lab analysis on the final 30 x 15 x 12-ft-deep excavation yielded non-detect (<10.0 ppm) TPH concentrations, meeting NMOCD guidelines. Chloride concentrations were relatively low and analysis of the final excavation samples yielded concentrations comparable to background ((103 ppm). The excavated soil was blended on site and then backfilled into the excavation and contoured to the surrounding surface. The disturbed surface area was seeded with a blend of native vegetation on 3/18/2005 and is expected to return to productive capacity at a normal rate.

enclosures: photos, lab results, PID field screenings

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

SITE SUPERVISOR Joe Gatts SIGNATURE not available COMPANY RICE Operating Company

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE Kristin Farris Pope

DATE 4/25/2005 TITLE Project Scientist

EME Burleson St. 'A' EOL

Unit 'M', Sec. 26, T19S, R36E

undisturbed junction box 9/17/2004

box removed; old plumbing 9/28/2004

new plumbing at new junction site 20 ft southwest of former

delineation trenches Oct. 2004

excavation and delineation Oct. 2004

backfilling excavation Feb. 2005

construction of new junction box 20 ft southwest of former

seeding disturbed surface 3/18/2005

ENVIRONMENTAL LAB OF

12600 West I-20 East - Odessa, Texas 79765

COPY

Analytical Report

Prepared for:

Roy Rascon

Rice Operating Co.

122 W. Taylor

Hobbs, NM 88240

Project: EME Lewis B. Burleson

Project Number: None Given

Location: None Given

Lab Order Number: 5B21002

Report Date: 02/23/05

Rice Operating Co.	Project: *EME Lewis B. Burleson*	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	02/23/05 12:32

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Bottom Comp. 12'	5B21002-01	Soil	02/16/05 13:15	02/19/05 18:00
4 Wall Comp.	5B21002-02	Soil	02/16/05 13:25	02/19/05 18:00
Remo Backfill	5B21002-03	Soil	02/16/05 13:30	02/19/05 18:00

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Rice Operating Co.	Project: EME Lewis B. Burleson	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	02/23/05 12:32

Organics by GC

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Bottom Comp. 12' (5B21002-01) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EB52101	02/21/05	02/21/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*80.6 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*75.2 %*	*70-130*		"	"	"	"	
4 Wall Comp. (5B21002-02) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EB52101	02/21/05	02/21/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*89.8 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*71.4 %*	*70-130*		"	"	"	"	
Remo Backfill (5B21002-03) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EB52101	02/21/05	02/21/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*91.8 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*72.8 %*	*70-130*		"	"	"	"	

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Rice Operating Co.	Project: EME Lewis B. Burleson	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	02/23/05 12:32

General Chemistry Parameters by EPA / Standard Methods

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Bottom Comp. 12' (5B21002-01) Soil									
Chloride	**260**	20.0	mg/kg	40	EB52216	02/21/05	02/21/05	EPA 300.0	
% Moisture	**18.6**	0.1	%	1	EB52109	02/21/05	02/22/05	% calculation	
4 Wall Comp. (5B21002-02) Soil									
Chloride	**261**	25.0	mg/kg	50	EB52216	02/21/05	02/21/05	EPA 300.0	
% Moisture	**12.4**	0.1	%	1	EB52109	02/21/05	02/22/05	% calculation	
Remo Backfill (5B21002-03) Soil									
Chloride	**223**	20.0	mg/kg	40	EB52216	02/21/05	02/21/05	EPA 300.0	
% Moisture	**9.8**	0.1	%	1	EB52109	02/21/05	02/22/05	% calculation	

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Rice Operating Co.	Project: EME Lewis B. Burleson	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	02/23/05 12:32

Organics by GC - Quality Control

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EB52101 - Solvent Extraction (GC)										
Blank (EB52101-BLK1)				Prepared & Analyzed: 02/21/05						
Gasoline Range Organics C6-C12	ND	10.0	mg/kg wet							
Diesel Range Organics >C12-C35	ND	10.0	"							
Total Hydrocarbon C6-C35	ND	10.0	"							
Surrogate: 1-Chlorooctane	*37.3*		*mg/kg*	*50.0*		*74.6*	*70-130*			
Surrogate: 1-Chlorooctadecane	*36.9*		"	*50.0*		*73.8*	*70-130*			
LCS (EB52101-BS1)				Prepared & Analyzed: 02/21/05						
Gasoline Range Organics C6-C12	471	10.0	mg/kg wet	500		94.2	75-125			
Diesel Range Organics >C12-C35	485	10.0	"	500		97.0	75-125			
Total Hydrocarbon C6-C35	956	10.0	"	1000		95.6	75-125			
Surrogate: 1-Chlorooctane	*39.5*		*mg/kg*	*50.0*		*79.0*	*70-130*			
Surrogate: 1-Chlorooctadecane	*35.9*		"	*50.0*		*71.8*	*70-130*			
Calibration Check (EB52101-CCV1)				Prepared & Analyzed: 02/21/05						
Gasoline Range Organics C6-C12	493		mg/kg	500		98.6	80-120			
Diesel Range Organics >C12-C35	554		"	500		111	80-120			
Total Hydrocarbon C6-C35	1050		"	1000		105	80-120			
Surrogate: 1-Chlorooctane	*55.4*		"	*50.0*		*111*	*70-130*			
Surrogate: 1-Chlorooctadecane	*44.0*		"	*50.0*		*88.0*	*70-130*			
Matrix Spike (EB52101-MS1)	**Source: 5B21002-01**			Prepared & Analyzed: 02/21/05						
Gasoline Range Organics C6-C12	608	10.0	mg/kg dry	614	ND	99.0	75-125			
Diesel Range Organics >C12-C35	612	10.0	"	614	ND	99.7	75-125			
Total Hydrocarbon C6-C35	1220	10.0	"	1230	ND	99.2	75-125			
Surrogate: 1-Chlorooctane	*50.4*		*mg/kg*	*50.0*		*101*	*70-130*			
Surrogate: 1-Chlorooctadecane	*37.0*		"	*50.0*		*74.0*	*70-130*			
Matrix Spike Dup (EB52101-MSD1)	**Source: 5B21002-01**			Prepared & Analyzed: 02/21/05						
Gasoline Range Organics C6-C12	608	10.0	mg/kg dry	614	ND	99.0	75-125	0.00	20	
Diesel Range Organics >C12-C35	649	10.0	"	614	ND	106	75-125	5.87	20	
Total Hydrocarbon C6-C35	1260	10.0	"	1230	ND	102	75-125	3.23	20	
Surrogate: 1-Chlorooctane	*49.7*		*mg/kg*	*50.0*		*99.4*	*70-130*			
Surrogate: 1-Chlorooctadecane	*37.2*		"	*50.0*		*74.4*	*70-130*			

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Rice Operating Co.	Project: EME Lewis B. Burleson	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	02/23/05 12:32

General Chemistry Parameters by EPA / Standard Methods - Quality Control

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EB52109 - General Preparation (Prep)										
Blank (EB52109-BLK1)				Prepared: 02/21/05 Analyzed: 02/22/05						
% Moisture	ND	0.1	%							
Duplicate (EB52109-DUP1)		**Source: 5B21002-01**		Prepared: 02/21/05 Analyzed: 02/22/05						
% Moisture	18.6	0.1	%		18.6			0.00	20	
Batch EB52216 - Water Extraction										
Blank (EB52216-BLK1)				Prepared & Analyzed: 02/21/05						
Chloride	ND	0.500	mg/kg							
Blank (EB52216-BLK2)				Prepared & Analyzed: 02/21/05						
Chloride	ND	0.500	mg/kg							
LCS (EB52216-BS1)				Prepared & Analyzed: 02/21/05						
Chloride	8.46		mg/L	10.0		84.6	80-120			
LCS (EB52216-BS2)				Prepared & Analyzed: 02/21/05						
Chloride	8.21		mg/L	10.0		82.1	80-120			
Calibration Check (EB52216-CCV1)				Prepared & Analyzed: 02/21/05						
Chloride	8.44		mg/L	10.0		84.4	80-120			
Calibration Check (EB52216-CCV2)				Prepared & Analyzed: 02/21/05						
Chloride	8.16		mg/L	10.0		81.6	80-120			
Duplicate (EB52216-DUP1)		**Source: 5B18004-01**		Prepared & Analyzed: 02/21/05						
Chloride	23.3	5.00	mg/kg		22.5			3.49	20	

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Rice Operating Co.	Project: EME Lewis B. Burleson	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	02/23/05 12:32

General Chemistry Parameters by EPA / Standard Methods - Quality Control

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EB52216 - Water Extraction										
Duplicate (EB52216-DUP2)	**Source: 5B21002-03**			Prepared & Analyzed: 02/21/05						
Chloride	240	20.0	mg/kg		223			7.34	20	

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Notes and Definitions

DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
RPD	Relative Percent Difference
LCS	Laboratory Control Spike
MS	Matrix Spike
Dup	Duplicate

Report Approved By: Raland K. Tuttle Date: 2/23/2005

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer
Jeanne Mc Murrey, Inorg. Tech Director
James L. Hawkins, Chemist/Geologist
Sandra Sanchez, Lab Tech.

Environmental Lab of Texas, Inc.

12600 West I-20 East
Odessa, Texas 79763
Phone: 915-563-1800
Fax: 915-563-1713

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: Roy Rascon
Company Name: Rice Operating
Company Address: 122 W. Taylor
City/State/Zip: Hobbs NM 88240
Telephone No: 505 393-9174 Fax No: 505 397-1471
Sampler Signature: Joe Scott

Project Name: ENE Lewis B. Burleson
Project #:
Project Loc:
PO #:

LAB # (lab use only): 58210[illegible]

FIELD CODE	Date Sampled	Time Sampled	No. of Containers	Preservative: Ice	HNO3	HCl	NaOH	H2SO4	None	Other (Specify)	Matrix: Water	Sludge	Soil	Other (specify)	Analyze For: TCLP: TOS (CL) SAR / ESP	TPH 418.1	TPH TX 1005/1005	TPH 8015M GRO/DRO	Metals: As Ag Ba Cd Cr Pb Hg Se	Volatiles	Semivolatiles	BTEX 8021B/8260	TOTAL	RUSH TAT (Pre-Schedule)	Standard TAT
Bottom Comp 12'	2/16/05	1:15	1	X									X		X			X							
4 WALL comp	2/16/05	1:25	1	X									X		X			X							
REMD backfill	2/16/05	1:30	1	X									X		X			X							
														X											

Special Instructions:

Sample Containers Intact? (Y) N
Temperature Upon Receipt: 2.0°C
Laboratory Comments: Iced jar

Relinquished by:	Date	Time	Received by:	Date	Time
Joe Scott	2/16/05	4:30			
[signature]	2-19-05	2:50	Received by ELOT: [signature]	2-19-05	1900

Environmental Lab of Texas
Variance / Corrective Action Report – Sample Log-In

Client: LOE Operating

Date/Time: 2/21/05 8:20

Order #: 5B21002

Initials: CK

Sample Receipt Checklist

Temperature of container/cooler?	Yes	No	2.0° C
Shipping container/cooler in good condition?	Yes	No	
Custody Seals intact on shipping container/cooler?	Yes	No	Not present
Custody Seals intact on sample bottles?	Yes	No	Not present
Chain of custody present?	Yes	No	
Sample Instructions complete on Chain of Custody?	Yes	No	
Chain of Custody signed when relinquished and received?	Yes	No	
Chain of custody agrees with sample label(s)	Yes	No	
Container labels legible and intact?	Yes	No	
Sample Matrix and properties same as on chain of custody?	Yes	No	
Samples in proper container/bottle?	Yes	No	
Samples properly preserved?	Yes	No	
Sample bottles intact?	Yes	No	
Preservations documented on Chain of Custody?	Yes	No	
Containers documented on Chain of Custody?	Yes	No	
Sufficient sample amount for indicated test?	Yes	No	
All samples received within sufficient hold time?	Yes	No	
VOC samples have zero headspace?	Yes	No	Not Applicable

Other observations:

_____

_____

_____

Variance Documentation:

Contact Person: - _____ Date/Time: _____ Contacted by: _____

Regarding:

_____

_____

_____

Corrective Action Taken:

_____

_____

_____

_____

_____

_____

_____

_____

15 x 30 x 12 ft excavation

COPY

HOBBS, NEW MEXICO 88240
PHONE: (505) 393-9174 FAX: (505) 397-1471

VOC FIELD TEST REPORT FORM

MODEL NO: PGM 76IS
CALIBRATION GAS
GAS COMPOSITION: ISOBUTYLENE AIR

LOT NO: 04-2747
EXP. DATE: 5/19/06
METER READING
ACCURACY: 100.'

SERIAL NO: 104412

100 PPM
BALANCE
FILL DATE: 11/19/04
ACCURACY: +/- 2%

SYSTEM	JUNCION	UNIT	SECTION	TOWNSHIP	RANGE
EME	LEWIS Burleson	M.	26	19	36

all composite samples

SAMPLE	PID RESULT	SAMPLE	PID RESULT
10' North	.1		
5' South	.1		
10' East	.1		
20' West	.1		
Bott. Comp 12'	.1		
4 WALL Comp	.1		
REMD. Backfill	.1		

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

Signature [signature] Date 2/17/05

Current Photodocumentation

RICE *Operating Company* (ROC)
419 West Cain Hobbs, NM 88240
Phone: (575) 393-2967 Fax: (575) 393-0293

EME Burleson St A-26 EOL (1R427-185)

UL/M, Section 26, T19S, R36E

Facing north 7/18/2013

Facing east 7/18/2013