

1R - 427-368

**REPORTS**

**DATE:**

4-23-12

1R 427-368  
RECEIVED CGC  
2012 MAY -1 P 1:50

EME A-4 EOL  
2011

CLOSURE

# RICE *Operating Company*

122 West Taylor • Hobbs, New Mexico 88240

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

May 1, 2012

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 A-4 EOL: UL/A, Sec. 4, 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 2011, ROC initiated work on the former A-4 EOL. The site is located in UL/A, Sec. 4, T20S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 40 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 3x7x6-ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in low concentrations of each. The 6-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of <16 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The excavated soil was returned to the excavation and contoured to the surrounding area. On 7/8/2011, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate. The junction box final report, photo documentation, laboratory analysis, PID sheet, chloride graph, and revegetation form 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". The signature is fluid and cursive, with a long horizontal stroke at the end.

Hack Conder  
Environmental Manager

enclosures

**RICE OPERATING COMPANY  
JUNCTION BOX FINAL REPORT**

**BOX LOCATION**

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
							Length	Width	Depth
Eunice Monument Eumont (EME)	A-4 EOL	A	4	20S	36E	Lea	Eliminated		

LAND TYPE: BLM \_\_\_\_\_ STATE \_\_\_\_\_ FEE LANDOWNER Faye Klein Family Trust OTHER \_\_\_\_\_

Depth to Groundwater 40 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 5/25/2011 Date Completed 7/8/2011 OCD Witness No

Soil Excavated 4.7 cubic yards Excavation Length 3 Width 7 Depth 6 feet

Soil Disposed None cubic yards Offsite Facility n/a Location n/a

**FINAL ANALYTICAL RESULTS:** Sample Date 5/25/2011 Sample Depth 6'

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

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
SOURCE 6' GRAB	0.4	<10.0	<10.0	<16.0

CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
background	6"	151
vertical delineation trench at the junction (source)	2'	141
	3'	139
	4'	151
	5'	148
	6'	151

**General Description of Remedial Action:** This junction and line were eliminated during the pipeline replacement/upgrade program. After the former junction box was removed, an investigation was conducted using a backhoe to collect soil samples at regular intervals creating a 3X7X6-ft. deep excavation. Chloride field tests performed on each sample yielded concentrations similar to that of the background sample. Organic vapors were measured using a PID, which yielded low concentrations. The deepest sample, 6 ft. BGS, was sent to a commercial laboratory for analysis of chloride and TPH, which confirmed low concentrations of each. The excavation was backfilled with excavated soil to ground surface and contoured to the surrounding area. On 7/8/2011, the 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, revegetation form

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

SITE SUPERVISOR Kyle Norman SIGNATURE *Kyle Norman*

REPORT ASSEMBLED BY Laura Peña SIGNATURE *Laura Peña* COMPANY RICE OPERATING COMPANY

PROJECT LEADER Zach Conder SIGNATURE *Zach Conder* DATE 4-23-12

# EME A-4 EOL

Unit A, Section 4, T20S, R36E



Site prior to excavation, facing north 5.25.11



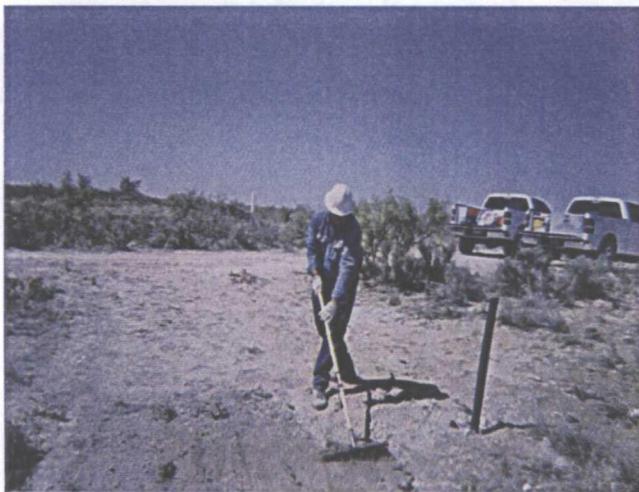
Excavating site, facing north 5.25.11



Collecting sample, facing north 5.25.11



Seeding site, facing south 7.8.11



Raking in seed, facing south 7.8.11



Site completed, facing north 7.8.11

June 01, 2011

Hack Conder  
Rice Operating Company  
112 W. Taylor  
Hobbs, NM 88240

RE: EME A-4 EOL

Enclosed are the results of analyses for samples received by the laboratory on 05/25/11 16:20.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method SW-846 8260	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method TX 1005	Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

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 (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

COPY

**Analytical Results For:**

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

 Received: 05/25/2011  
 Reported: 06/01/2011  
 Project Name: EME A-4 EOL  
 Project Number: EME A-4 EOL 20/36  
 Project Location: NOT GIVEN

 Sampling Date: 05/25/2011  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SOURCE @ 6' (H101077-01)**

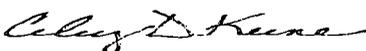
Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	05/27/2011	ND	448	112	400	3.64		
TPH 8015M		mg/kg		Analyzed By: AB						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	05/28/2011	ND	172	85.9	200	9.14		
DRO >C10-C28	<10.0	10.0	05/28/2011	ND	159	79.5	200	8.55		
Surrogate: 1-Chlorooctane	117 %	70-130								
Surrogate: 1-Chlorooctadecane	112 %	70-130								

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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.



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*

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Celey D. Keene, Lab Director/Quality Manager



**CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

101 East Marland, Hobbs, NM 88240  
 (505) 393-2326 FAX (505) 393-2476

Company Name: <u>Rice</u>		<b>BILL TO</b>		<b>ANALYSIS REQUEST</b>													
Project Manager: <u>Mark Madon</u>		P.O. #:															
Address: <u>1372 W Taylor</u>		Company:															
City: <u>Hobbs</u> State: <u>NM</u> Zip: <u>88240</u>		Attn:															
Phone #: Fax #:		Address:															
Project #: Project Owner:		City:															
Project Name: <u>A-4EOL</u>		State: Zip:															
Project Location: <u>EMO 30-34</u>		Phone #:															
Sampler Name: <u>Clean Sample</u>		Fax #:															
FOR LAB USE ONLY																	
Lab I.D.		Sample I.D.		G/RAB OR C/COMP.	# CONTAINERS	MATRIX				PRESERV.		SAMPLING		DATE		TIME	
H101077		Sons @ 6'				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE / COOL				
1						X				X	X			2-25-11	2:08	X	X

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

Relinquished By: <u>[Signature]</u>		Date: <u>2-25-11</u>		Received By: <u>Jodi Benson</u>		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No		Add'l Phone #:	
		Time: <u>4:20</u>				Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No		Add'l Fax #:	
Relinquished By:		Date:		Received By:		REMARKS: <u>1/100 mg lead as conc. BPH in Cerebrum</u> <u>1/100 mg lead as conc. in 1/2 W. Hemisphere Cerebrum</u> <u>K. Sons @ Rice - gudruny</u>			
		Time:							
Delivered By: (Circle One) Sampler - UPS - Bus - Other:				Sample Condition Cool Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No		CHECKED BY: (Initials) <u>[Signature]</u>			

# 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.		MODEL: PGM 7300	SERIAL NO: 590-000508
MODEL		MODEL: PGM 7300	SERIAL NO: 590-000504
NO.		MODEL: PGM 7320	SERIAL NO: 592-903318
	X	MODEL: PGM 7300	SERIAL NO: 590-000183

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO :930132	EXPIRATION DATE:4-28-13
METER READING ACCURACY:100.00	

ACCURACY : +/- 2%

<b>COMPANY</b>
RICE

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	A-4 EOL	A	4	20S	36E

SAMPLE ID	PID	SAMPLE ID	PID
<i>Back Ground @ 6''</i>	<i>0.4</i>		
<i>@ 2'</i>	<i>0.6</i>		
<i>@ 3'</i>	<i>0</i>		
<i>@ 4'</i>	<i>0.2</i>		
<i>@ 5'</i>	<i>0.9</i>		
<i>@ 6'</i>	<i>0.4</i>		

COPY

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

SIGNATURE:

DATE: *5-25-11*

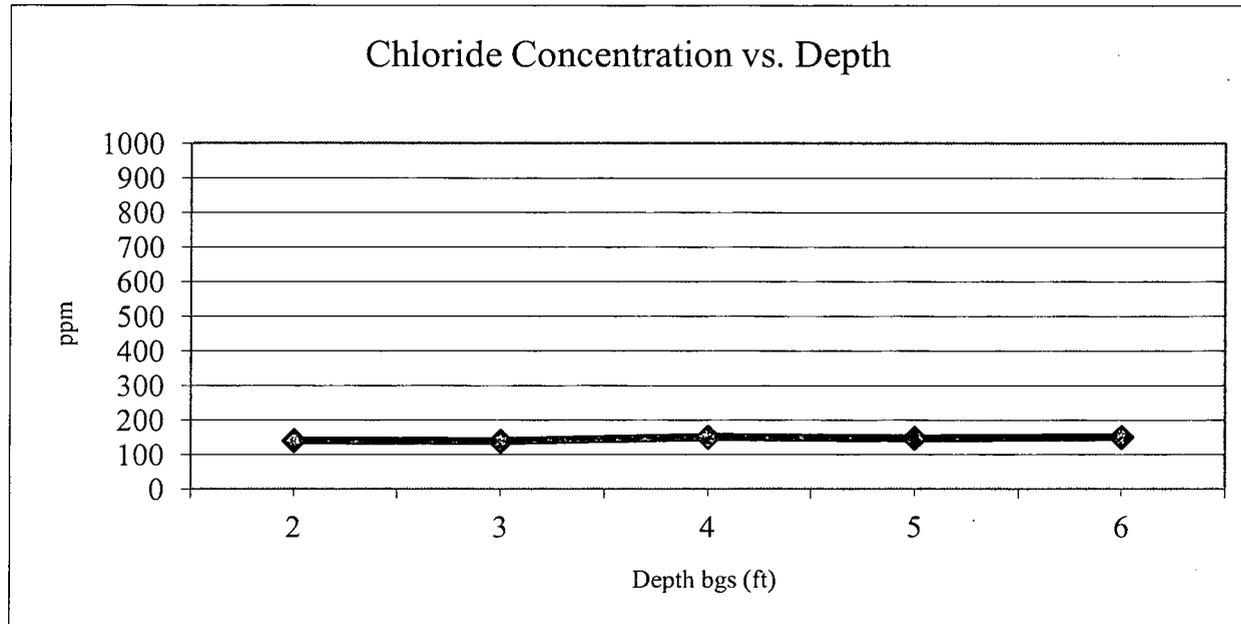
# EME A-4 EOL

Unit 'A', Sec. 4, T20S, R36E

*Backhoe samples at junction (source)*

Depth bgs (ft)	[Cl <sup>-</sup> ] ppm
2	141
3	139
4	151
5	148
6	151

Groundwater = 159.5 ft





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

## REVEGETATION FORM

### 1. General Information

Site name: Rice EME A-4 EOL						
U/L A	Section 4	Township 20S	Range 36E	County Lea	Latitude N 32° 36' 27.44"	Longitude W 103° 21' 19.4"
Contact Name: Hack Conder						
Email: hconder@rice-ecs.com						
Site size: 459 square feet				Map detail of site attached <input type="checkbox"/>		
Additional information:						

### 2. Soils

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

Salvaged from site <input 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):	Rollerpack <input type="checkbox"/>
Date completed: 7/8/2011					

### 3. Bioremediation

Fertilizer <input type="checkbox"/>	Hay <input type="checkbox"/>	Other <input type="checkbox"/>
Type:	Describe:	
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: Boyd Johnston Mix ½ lbs.	Seeding date: 7/8/2011
Broadcast <input checked="" type="checkbox"/>			
Method: Seeding Broadcaster			
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: 7/8/2011
Signature:		

COPY