

1R - 427-376

REPORTS

DATE:

4-10-12

1R427-376
RECEIVED OOL
2012 MAY -1 PM: 51

EME I-19 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 I-19 EOL: UL/I, Sec. 19, T19S, 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 2011, ROC initiated work on the former I-19 EOL junction box. The site is located in UL/I, Sec. 19, T19S, R37E. 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 3x7x12-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 12-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 16 mg/kg, a gasoline range organics (GRO) concentration of <50 mg/kg and a diesel range organics (DRO) concentration of <50 mg/kg. The excavated soil was returned to the excavation. The remaining excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area. On 5/12/2011, 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", with a long horizontal flourish extending to the right.

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)	I-19 EOL	I	19	19S	37E	Lea	Eliminated		

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

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

Date Started 3/24/2011 Date Completed 5/12/2011 OCD Witness No

Soil Excavated 9.3 cubic yards Excavation Length 3 Width 7 Depth 12 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 4/26/2011 Sample Depth 12'

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 12' GRAB	12.0	<50.0	<50.0	16

CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
background	6"	149
vertical delineation trench at the junction (source)	2'	149
	3'	148
	4'	149
	5'	141
	6'	198
	7'	85
	8'	83
	9'	81
	10'	116
	11'	80
12'	89	

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 3X7X12-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, 12 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. The remaining excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area. On 5/12/2011, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

*Stock pond 1,198 ft northeast

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 Robert Egans SIGNATURE signature not available

REPORT ASSEMBLED BY Laura Peña SIGNATURE Laura Peña

COMPANY RICE OPERATING COMPANY

PROJECT LEADER Larry Bruce Baker, Jr. SIGNATURE Larry Bruce Baker Jr.

DATE 4-10-12

EME I-19 EOL

Unit I, Section 19, T19S, R37E



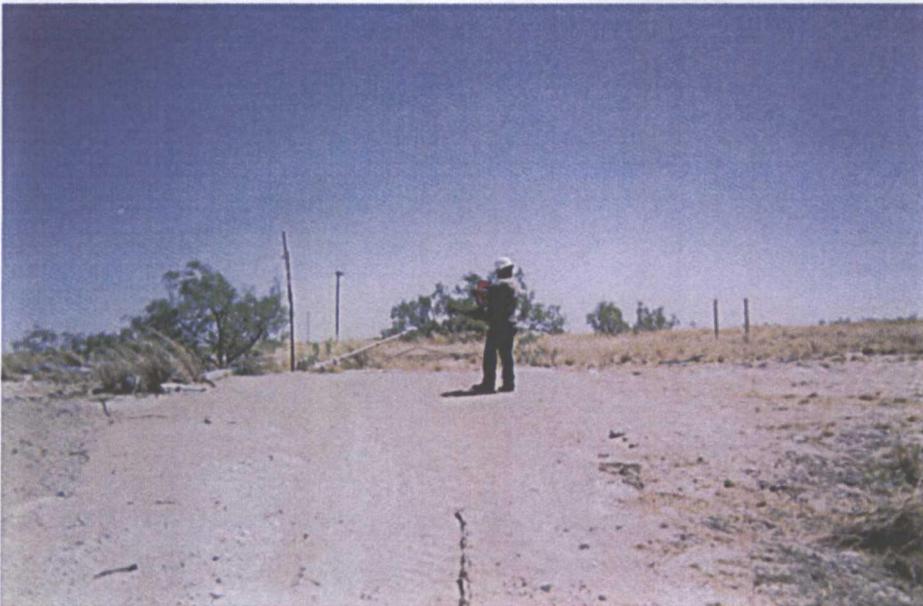
Collecting sample, facing east

4/26/2011



Backfilling with clean imported soil, facing east

5/12/2011



Seeding location, facing south

5/12/2011



Site complete, facing west

5/12/2011

May 03, 2011

Bruce Baker
Rice Operating Company
112 W. Taylor
Hobbs, NM 88240

RE: EME I-19 EOL

Enclosed are the results of analyses for samples received by the laboratory on 04/27/11 8:05.

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

Analytical Results For:

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

 Received: 04/27/2011
 Reported: 05/03/2011
 Project Name: EME I-19 EOL
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 04/26/2011
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: SOURCE @ 12' (H100869-01)

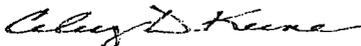
Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	16.0	16.0	05/02/2011	ND	416	104	400	3.77		
TPH 8015M		mg/kg		Analyzed By: AB						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<50.0	50.0	05/03/2011	ND	183	91.7	200	6.63		
DRO >C10-C28	<50.0	50.0	05/03/2011	ND	190	95.2	200	9.96		

Surrogate: 1-Chlorooctane 97.5 % 70-130
 Surrogate: 1-Chlorooctadecane 107 % 70-130

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

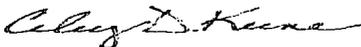
Notes and Definitions

- 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

Cardinal Laboratories

*=Accredited Analyte

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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 Operating Co</u>				BILL TO				ANALYSIS REQUEST																							
Project Manager: <u>Bruce Baker</u>				P.O. #:																											
Address: <u>122 W. Taylor</u>				Company:																											
City: <u>Hobbs</u>		State: <u>NM</u>		Zip: <u>88240</u>		Attn:																									
Phone #: <u>575-393-9174</u>		Fax #:		Address:																											
Project #:		Project Owner:		City:																											
Project Name:				State: Zip:																											
Project Location: <u>FME I-19 EOK</u>				Phone #:																											
Sampler Name: <u>Robert Egans</u>				Fax #:																											
FOR LAB USE ONLY																															
Lab I.D.	Sample I.D.	C (GRAB OR C) (OMP)	# CONTAINERS	MATRIX																PRESERV.		SAMPLING		DATE	TIME	CI	TPH				
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER	ACID/BASE	ICE / COOL	OTHER																			
<u>HDD869-1</u>	<u>Source @ 12'</u>	<u>C</u>	<u>1</u>			<u>✓</u>					<u>✓</u>		<u>4.2011</u>	<u>2.41</u>	<u>✓</u>	<u>✓</u>															

PLEASE NOTE: Liability and Damages, Cardinal's ability and client's recourse remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analysis. 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 accidental 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 claims are based upon any of the above stated reasons or otherwise.

Relinquished By: <u>Robert Egans</u>	Date: <u>4/27/11</u>	Received By: <u>[Signature]</u>	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
Time: <u>7:30</u>			Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Relinquished By: <u>[Signature]</u>	Date: <u>4/27/11</u>	Received By: <u>Jodi Benson</u>	REMARKS:	
Time: <u>8:05</u>				
Delivered By: (Circle One) Sampler - UFS - Bus - Other:	Sample Condition Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	CHECKED BY: <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: 930360	EXPIRATION DATE: 5-24-13
METER READING ACCURACY: 100.00	

ACCURACY : +/- 2%

COMPANY
Rice Operating Company

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	I-19 EOL	I	19	19S	37E

SAMPLE ID	PID	SAMPLE ID	PID
Source @ 7'	460		
8'	1075		
9'	2891		
10'	46.3		
11'	37.4		
12'	12		

COPY

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

SIGNATURE: *Adel Yous*

DATE: 4/26/2011

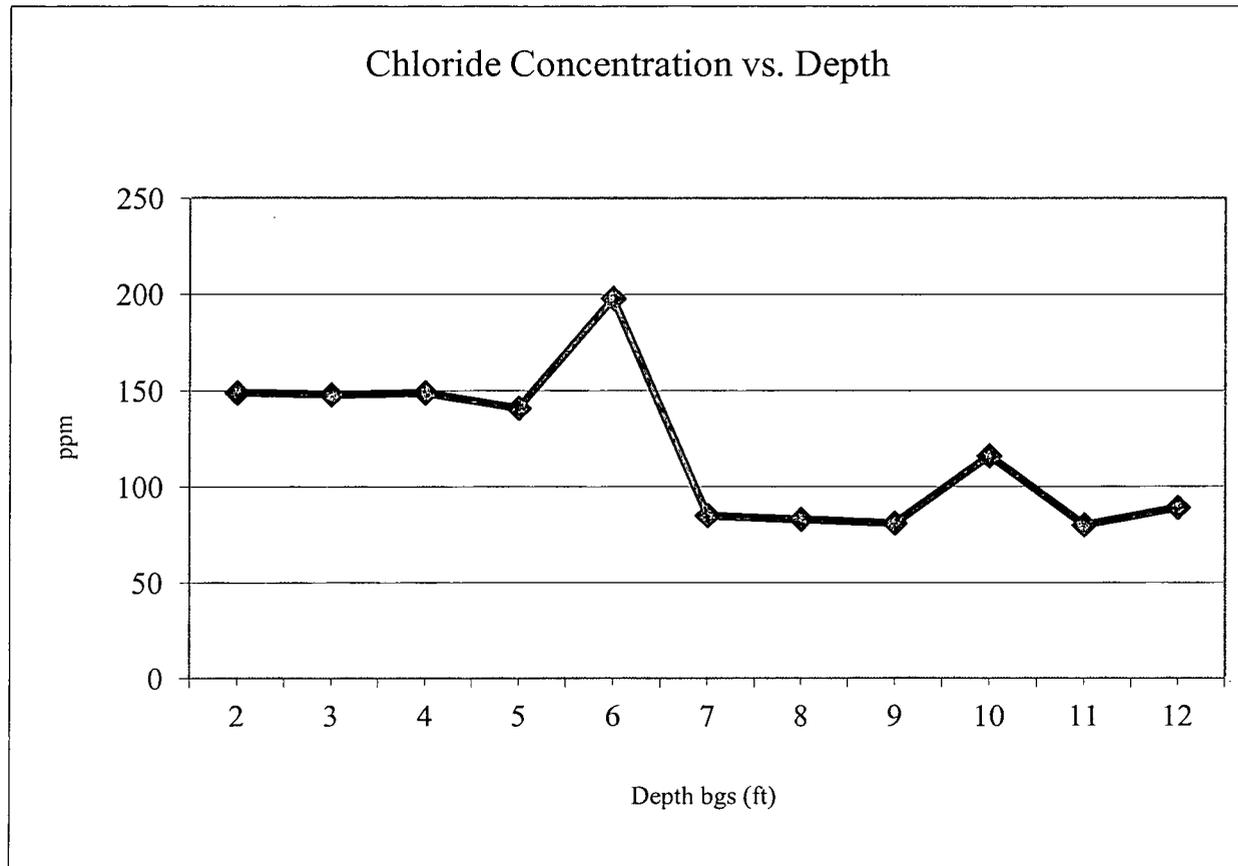
EME I-19 EOL

Unit T, Sec. 19, T19S, R37E

Backhoe samples at junction (source)

Depth bgs (ft)	[Cl] ppm
2	149
3	148
4	149
5	141
6	198
7	85
8	83
9	81
10	116
11	80
12	89

Groundwater = 40 ft





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

REVEGETATION FORM

1. General Information

Site name: EME I-19 EOL						
U/L I	Section 19	Township 19S	Range 37E	County Lea	Latitude N 32*38.386'	Longitude W 103*17.117'
Contact Name: Bruce Baker						
Email: bbaker@rice-esc.com						
Site size: 27x21		square feet 567		Map detail of site attached <input checked="" 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 checked="" type="checkbox"/>	Bioremediated <input type="checkbox"/>	Imported <input checked="" 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: 5/12/2011				

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: ½ lb. Blue Grama and ½ lb. Side Oats Grama	Seeding date: 5/12/2011
Broadcast <input checked="" type="checkbox"/>			
Method: Hand spreader			
Soil conditions during seeding: Dry <input checked="" type="checkbox"/> Damp <input type="checkbox"/> Wet <input type="checkbox"/>			
Photos attached <input checked="" type="checkbox"/>	Observations:		
Number of photos: 6			

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: Robert Egans	Title: Environmental Tech	Date: 5/12/2011
Signature: <i>Robert Egans</i>		

COPY