1R - 427-379

REPORTS

DATE:

4-10-12

EME Jct. H-27
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 Jct. H-27: UL/H, Sec. 27, T19S, 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 H-27 junction box. The site is located in UL/H, Sec. 27, T19S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 49 +/- 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 224 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 3/12/2012, 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

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)	Jct. H-27	H	27	19S	36E	Lea	Eliminated		

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

Depth to Groundwater 49 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 6/30/2011 Date Completed 1/17/2012 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** 8/2/2011 **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	0.4	<10.0	<10.0	224

CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
background	6"	53
vertical delineation trench at the junction (source)	1'	90
	2'	80
	3'	102
	4'	88
	5'	57
	6'	399
	7'	390
	8'	323
	9'	260
	10'	170
	11'	166
	12'	142

General Description of Remedial Action: This junction was 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 to ground surface and contoured to the surrounding area. On 3/2/2012, 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 Oscar Frayre SIGNATURE _____

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

PROJECT LEADER Zach Conder SIGNATURE _____ DATE 4-10-12

EME Jct. H-27

Unit H, Section 27, T19S, R36E

Site prior to excavation, facing north 6.30.11

Final excavation 6.30.11

Collecting sample, facing west 8.2.11

Seeding site, facing east 3.2.12

CARDINAL Laboratories

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

August 08, 2011

Bruce Baker

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: EME H-27

Enclosed are the results of analyses for samples received by the laboratory on 08/03/11 8:01.

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 Hydorcarbons

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

Cardinal Laboratories is accreditated 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

Celey D. Keene

Lab Director/Quality Manager

COPY

CARDINAL Laboratories

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

Analytical Results For:

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

Received:	08/03/2011	Sampling Date:	08/02/2011
Reported:	08/08/2011	Sampling Type:	Soil
Project Name:	EME H-27	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: SOURCE @ 12' (H101606-01)

Chloride, SM4500Cl-B mg/kg **Analyzed By: HM**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**224**	16.0	08/03/2011	ND	432	108	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	08/05/2011	ND	176	87.9	200	1.16	
DRO >C10-C28	<10.0	10.0	08/05/2011	ND	163	81.6	200	1.19	

Surrogate: 1-Chlorooctane	*101 %*	*70-130*
Surrogate: 1-Chlorooctadecane	*106 %*	*70-130*

Cardinal Laboratories

*=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

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

Celey D. Keene, Lab Director/Quality Manager

CARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603
(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325)673-7020

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: Rice Operating Company		**BILL TO**	
Project Manager: Bruce Baker		P.O. #:	
Address: 122 W. Taylor		Company:	
City: Hobbs	State: NM Zip: 88240	Attn:	
Phone #: 575-393-9174	Fax #: 575-397-1471	Address:	
Project #:	Project Owner:	City:	
Project Name: EME H-27		State:	Zip:
Project Location:		Phone #:	
Sampler Name: Dak Hannis		Fax #:	

ANALYSIS REQUEST: CL⁻ ; TPH 8015M

Lab I.D. (FOR LAB USE ONLY)	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE / COOL	OTHER:	DATE	TIME	CL⁻	TPH 8015M
H101606 -1	Source @ 12'	G	1			✓					✓		8-2-11	4:23	✓	✓

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: Dak Hannis	Date: 8/3/11 Time: 7:30	Received By: [signature]	Phone Result: ☐ Yes ☐ No Add'l Phone #:
Relinquished By: [signature]	Date: 8/3/11 Time: 8:01	Received By: Jodi Henson	Fax Result: ☐ Yes ☐ No Add'l Fax #:
Delivered By: (Circle One) Sampler - UPS - Bus - Other: -13°c		Sample Condition Cool ☒ Yes ☐ No Intact ☒ Yes ☐ No; CHECKED BY: (Initials) JH	REMARKS: E-Mail Results To: R Hays @ RiceSwd.com; B Baker " " "; A Lopez " " "; D Hannis " " "; 2. Conder

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

#26

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

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO :	EXPIRATION DATE:
METER READING ACCURACY:	

ACCURACY : +/- 2%

COMPANY
RICE

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	JCT. H-27	H	27	T19S	R36E

SAMPLE ID	PID	SAMPLE ID	PID
6'	13.2		
7'	22.9		
8'	134.9		
9'	68.2		
10'	4		
11'	0.5		
12'	0.4		

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

SIGNATURE: Robert Gray DATE: 8-2-2011

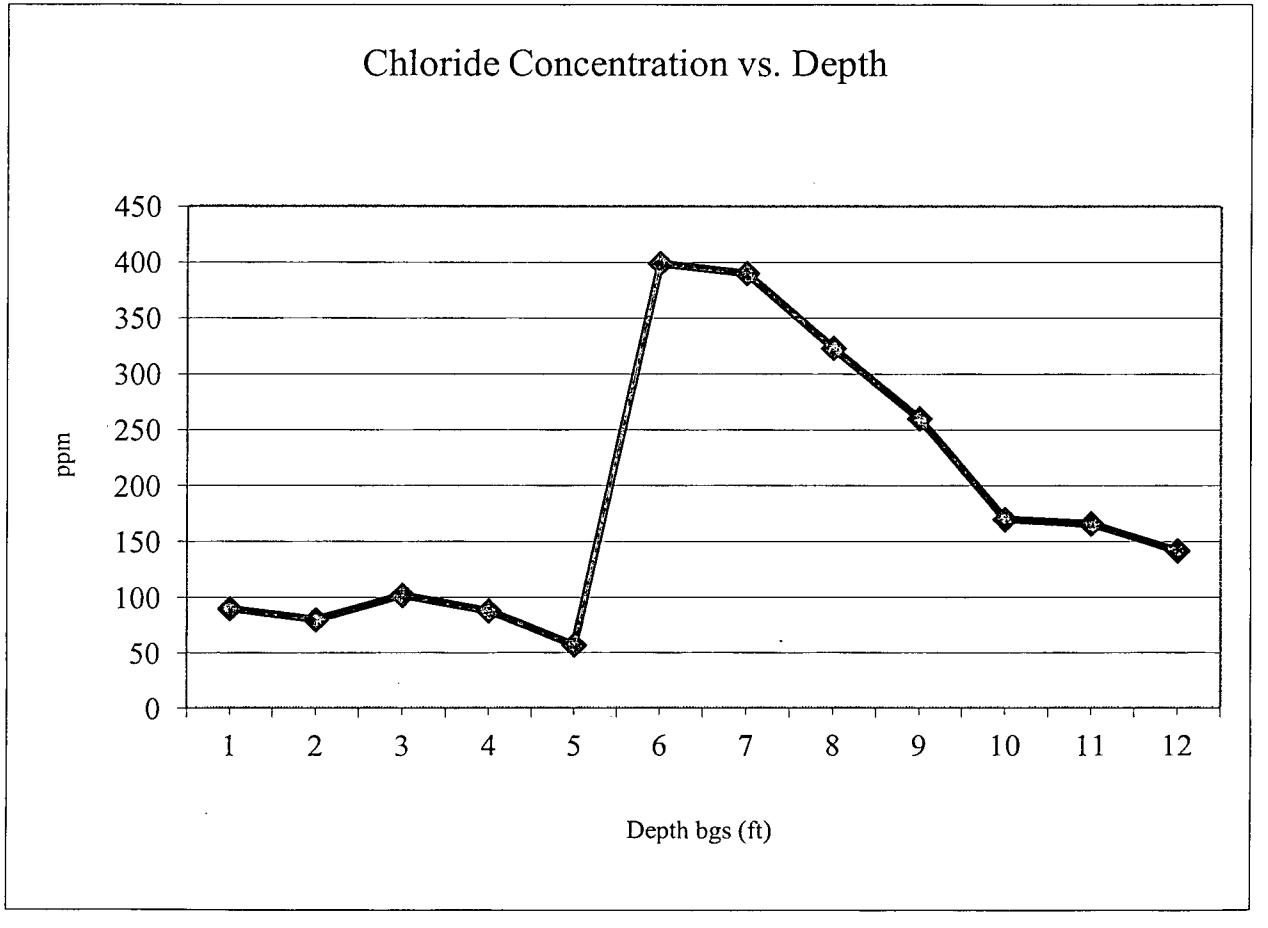
EME Jct. H-27

Unit 'H', Sec. 27, T19S, R36E

Backhoe samples at junction (source)

Depth bgs (ft)	[Cl⁻] ppm
1	90
2	80
3	102
4	88
5	57
6	399
7	390
8	323
9	260
10	170
11	166
12	142

Groundwater = 49 ft



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

VEGETATION FORM

1. General Information

Site name: EME Jct. H-27						
U/L H	Section 27	Township 19S	Range 36E	County Lea	Latitude N-32*38.045'	Longitude W-103*20.074''
Contact Name: Zack Conder						
Email: zconder@rice-ecs.com						
Site size: 1,288 square feet			Map detail of site attached ☐			
Additional information:						

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

Salvaged from site ☒	Bioremediated ☐	Imported ☐	Blended ☐	Depth (in):
Texture: Sandy	Describe soil & subsoil: Blow sand and subsoil caliche			
Soil prep methods:	Rip ☐ Depth(in):	Disc ☐ Depth (in):		Rollerpack ☐
Date completed:				

3. Bioremediation

Fertilizer ☐	Hay ☐	Other ☐
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 ☒	Prescribed mix ☐	Seed mix name: 1lb Blue Grama	Seeding date: 3-2-12
Broadcast ☒ Method: Portable seeder			
Soil conditions during seeding: Dry ☒ Damp ☐ Wet ☐			
Photos attached ☒ Number of photos:	Observations:		

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: OSCAR FRAYRE	Title: Environmental Tech.	Date:3-2-12
Signature:		

COPY