

1R - 427-381

# REPORTS

DATE:

4-10-12

1R427-381

RECEIVED CDD

2012 MAY -1 P 1:51

EME Jct. J-25-2

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. J-25-2: UL/J, Sec. 25, 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 J-25-2 junction box. The site is located in UL/J, Sec. 25, T19S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 25 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 10x25x12 ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in low concentrations of TPH and elevated concentrations of chloride. The excavated soil was blended on site and representative composite samples of the excavation bottom, the excavation walls, and the blended backfill were sent to a commercial for analysis of chloride and TPH, resulting in a 4-WALL chloride concentration of 64 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The bottom composite resulted in chloride concentrations of 160 mg/kg, and concentrations of GRO and DRO below detectable limits. The blended backfill resulted in a chloride concentration of 80 mg/kg, and concentrations of GRO and DRO below detectable limits. The excavation was backfilled with the blended soil to 1 ft BGS. The excavation was backfilled from 1 ft BGS to ground surface with imported sand and contoured to the surrounding area. On 5/13/2011, 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



# EME Jct. J-25-2

Unit J, Section 25, T19S, R36E



Collecting sample, facing west

4.25.11



Final excavation, facing west

4.26.11



Spreading seed, facing north

5.13.11



Site complete, facing north

5.13.11

May 03, 2011

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

RE: EME JCT J-25-2 (19/36)

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.

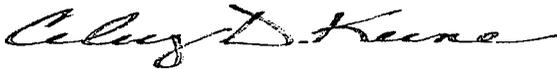
Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

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

COPY

**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 JCT J-25-2 (19/36)  
 Project Number: NONE GIVEN  
 Project Location: EME JCT J-25-2 (19/36)

 Sampling Date: 04/25/2011  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: 5 PT BTM COMP (H100870-01)**

Chloride, SM4500Cl-B		mg/kg	Analyzed By: HM							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Chloride</b>	<b>160</b>	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	<10.0	10.0	05/03/2011	ND	183	91.7	200	6.63		
DRO >C10-C28	<10.0	10.0	05/03/2011	ND	190	95.2	200	9.96		
<i>Surrogate: 1-Chlorooctane</i>	92.6 %	70-130								
<i>Surrogate: 1-Chlorooctadecane</i>	103 %	70-130								

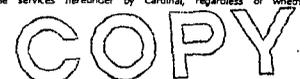
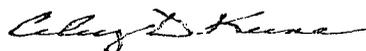
**Sample ID: 4 WALL COMP (H100870-02)**

Chloride, SM4500Cl-B		mg/kg	Analyzed By: HM							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Chloride</b>	<b>64.0</b>	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	<10.0	10.0	05/03/2011	ND	183	91.7	200	6.63		
DRO >C10-C28	<10.0	10.0	05/03/2011	ND	190	95.2	200	9.96		
<i>Surrogate: 1-Chlorooctane</i>	88.1 %	70-130								
<i>Surrogate: 1-Chlorooctadecane</i>	95.1 %	70-130								

Cardinal Laboratories

\* = Accredited Analyte

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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 JCT J-25-2 (19/36)  
 Project Number: NONE GIVEN  
 Project Location: EME JCT J-25-2 (19/36)

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

**Sample ID: BLENDED BACKFILL (H100870-03)**

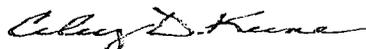
Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Chloride</b>	<b>80.0</b>	16.0	05/02/2011	ND	416	104	400	3.77		
TPH 8015M		mg/kg		Analyzed By: AB						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	05/03/2011	ND	183	91.7	200	6.63		
DRO >C10-C28	<10.0	10.0	05/03/2011	ND	190	95.2	200	9.96		
<i>Surrogate: 1-Chlorooctane</i>		<i>91.7 %</i>	<i>70-130</i>							
<i>Surrogate: 1-Chlorooctadecane</i>		<i>104 %</i>	<i>70-130</i>							

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\* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

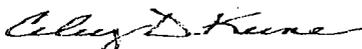
- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- \*\* Samples not received at proper temperature of 6°C or below.
- \*\*\* Insufficient time to reach temperature.
- Chloride by SM4500C-B does not require samples be received at or below 6°C  
Samples reported on an as received basis (wet) unless otherwise noted on report

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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# 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	SERIAL NO: 590-000183

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: <u>930737</u>	EXPIRATION DATE: <u>6-16-2013</u>
METER READING ACCURACY: <u>100ppm</u>	

ACCURACY : +/- 2%

<b>COMPANY</b>

SITE	UNIT	SECTION	TOWN SHIP	RANGE
<u>Jct J-25-2</u>	<u>J</u>	<u>25</u>	<u>19S</u>	<u>36E</u>

SAMPLE ID	PID	SAMPLE ID	PID
<u>4Wall Composite</u>	<u>3.3</u>		
<u>Blended Back Fill</u>	<u>2.8</u>		

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

SIGNATURE: Robert Jones

DATE: 4-26-2011

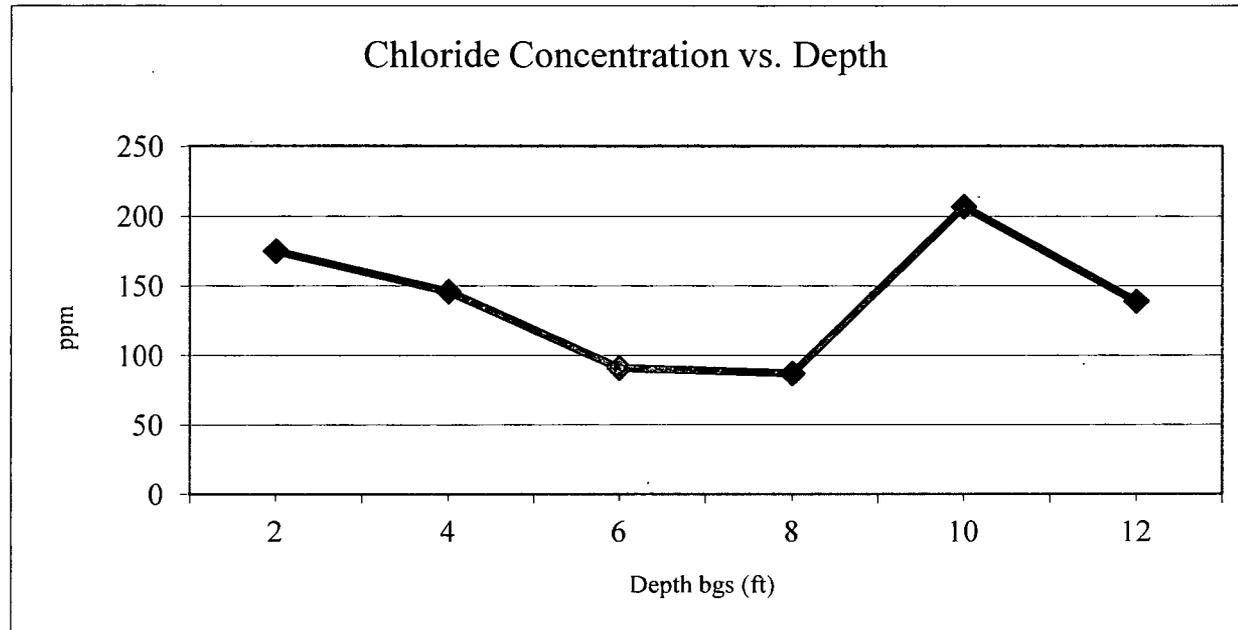
# EME Jct. J-25-2

Unit 'J', Sec. 25, T19S, R36E

*Backhoe samples 5' north of source*

Depth bgs (ft)	[Cl <sup>-</sup> ] ppm
2	175
4	146
6	91
8	87
10	207
12	139

Groundwater = 25 ft





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

## REVEGETATION FORM

### 1. General Information

Site name: EME J-25-2						
U/L J	Section 25	Township T19S	Range R36E	County LEA	Latitude 32* 37,471'	Longitude 103* 18, 136'
Contact Name: Bruce Baker						
Email: bbaker@rice-ecs.com						
Site size: 104X50 5200 square feet			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 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: 5-13-2011					

### 3. Bioremediation

Fertilizer <input type="checkbox"/>	Hay <input type="checkbox"/>	Other <input checked="" 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: 2 ½ lbs. of blue grama & 2 ½ lbs. of side oats grama Seeding date: 5-13-2011
Broadcast <input checked="" type="checkbox"/>		
Method: Manuel 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: 5-13-2011
Signature: <i>Robert Egans</i>		

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