

1R - 427-382

REPORTS

DATE:

3-22-12

Hansen, Edward J., EMNRD

From: Laura Pena <lpena@riceswd.com>
Sent: Tuesday, October 02, 2012 3:15 PM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder
Subject: EME Jct. P-22 (1R427-382) Photo Documentation
Attachments: EME Jct. P-22 (1R427-382) Photo Documentation.pdf

Mr. Hansen,

Attached is the photo documentation for the EME Jct. P-22 (1R427-382) prior to excavation as requested.

Thank you,
Laura





1R427-382
RECEIVED OGD

2012 MAY -1 P 1:52

EME Jct. P-22
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. P-22: UL/P, Sec. 22, 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 P-22 junction box. The site is located in UL/P, Sec. 22, 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 3x7x4-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 4-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 below detectable limits, and a diesel range organics (DRO) concentration of 12.3 mg/kg. The excavated soil was returned to the excavation and contoured to the surrounding area. On 8/4/2011, 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, sweeping 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) | Jct. P-22 | P | 22 | 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 8/3/2011 Date Completed 8/4/2011 OCD Witness No

Soil Excavated 3.1 cubic yards Excavation Length 3 Width 7 Depth 4 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 8/3/2011 Sample Depth 4'

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 4' GRAB | 1.1 | <10.0 | 12.3 | <16 |

| CHLORIDE FIELD TESTS | | |
|--|-------|-------|
| LOCATION | DEPTH | mg/kg |
| background | 6" | 28 |
| vertical delineation trench at the junction (source) | 2' | 55 |
| | 3' | 58 |
| | 4' | 54 |

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 3X7X4-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, 4 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 8/4/2011, 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 Robert Egans SIGNATURE *Robert Egans*

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

PROJECT LEADER Zach Conder SIGNATURE *Zach Conder* DATE 3-22-12

EME Jct. P-22

Unit P, Section 22, T19S, R36E



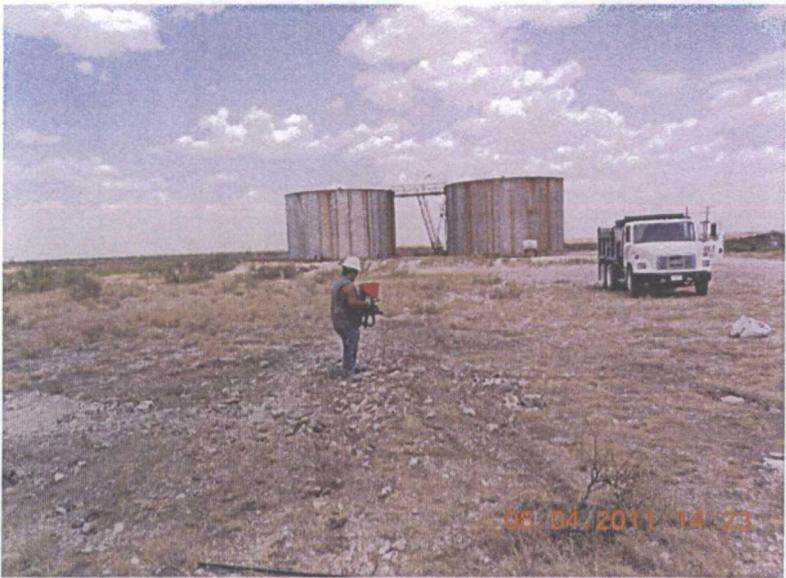
Digging source vertical, facing east

8.3.11



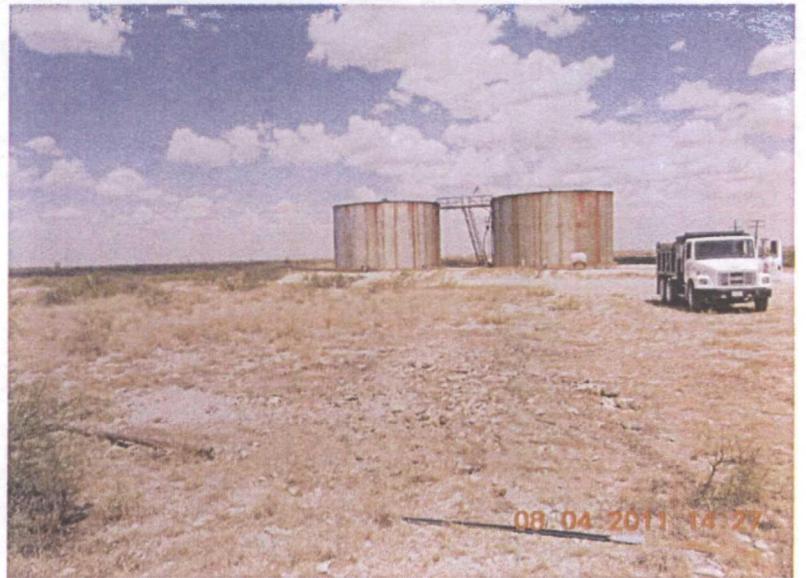
Collecting sample, facing east

8.3.11



Spreading seed, facing east

8.4.11



Site complete, facing east

8.4.11

August 08, 2011

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

RE: EME JCT P-22

Enclosed are the results of analyses for samples received by the laboratory on 08/03/11 16:35.

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.

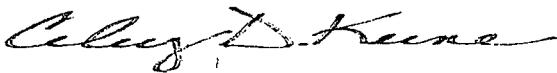
Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

| | |
|------------------|------------------------------|
| 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: | 08/03/2011 | Sampling Date: | 08/03/2011 |
| Reported: | 08/08/2011 | Sampling Type: | Soil |
| Project Name: | EME JCT P-22 | Sampling Condition: | Cool & Intact |
| Project Number: | NONE GIVEN | Sample Received By: | Jodi Henson |
| Project Location: | NOT GIVEN | | |

Sample ID: SOURCE @ 4' (H101613-01)

| 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 | 08/04/2011 | ND | 368 | 92.0 | 400 | 12.2 | | |
| 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 | 08/06/2011 | ND | 190 | 95.2 | 200 | 1.22 | | |
| DRO >C10-C28 | 12.3 | 10.0 | 08/06/2011 | ND | 172 | 85.9 | 200 | 1.73 | | |

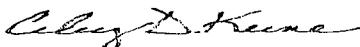
| | | |
|-------------------------------|-------|--------|
| Surrogate: 1-Chlorooctane | 102 % | 70-130 |
| Surrogate: 1-Chlorooctadecane | 112 % | 70-130 |

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Cardinal Laboratories

* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

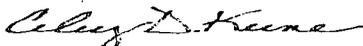
- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- ** Samples not received at proper temperature of 6°C or below.
- *** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
Samples reported on an as received basis (wet) unless otherwise noted on report

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*=Accredited Analyte

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Caley D. Keene, Lab Director/Quality Manager

Laboratories

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Mariand, 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>1722 West Taylor</u> | | Company: | | | | | | | | | | | | | | | | | | | |
| City: <u>Hobbs</u> State: <u>NM</u> Zip: <u>88240</u> | | Attn: | | | | | | | | | | | | | | | | | | | |
| Phone #: <u>393-9174</u> Fax #: | | Address: | | | | | | | | | | | | | | | | | | | |
| Project #: | | City: | | | | | | | | | | | | | | | | | | | |
| Project Name: | | State: Zip: | | | | | | | | | | | | | | | | | | | |
| Project Location: <u>EME Jct. P-22</u> | | Phone #: | | | | | | | | | | | | | | | | | | | |
| Sampler Name: <u>Robert Egans</u> | | Fax #: | | | | | | | | | | | | | | | | | | | |
| FOR LAB USE ONLY | | | | MATRIX | | | | | | | | | | | | | | PRESERV | | SAMPLING | |
| Lab I.D. | Sample I.D. | (GIRAB OR C)COMP. | # CONTAINERS | GROUNDWATER | WASTEWATER | | | | | | | | | | | | | SOIL | ... OIL | SLUDGE | OTHER : |
| <u>H101013</u> | <u>-1 SOURCE 6 41</u> | <u>G 1</u> | | | | <u>✓</u> | | | | | | | <u>4-3-11</u> | <u>1:30</u> | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | |

TOP

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| | | | | |
|--------------------------------------|---|---------------------------------|--|----------------|
| Relinquished By: <u>Robert Egans</u> | Date: <u>4/3/11</u> Time: <u>5:35</u> | Received By: <u>Jodi Benson</u> | Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No | Add'l Phone #: |
| Relinquished By: | Date: | Received By: | Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No | Add'l Fax #: |
| Delivered By: (Circle One) | Sample Condition | CHECKED BY: | REMARKS: | |
| Sampler - UPS - Bus - Other: | Cool Intact <input type="checkbox"/> Yes <input type="checkbox"/> No | (initials) <u>JE</u> | | |

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

#26

CHLORIDE CONCENTRATION CURVE

RICE Operating Company

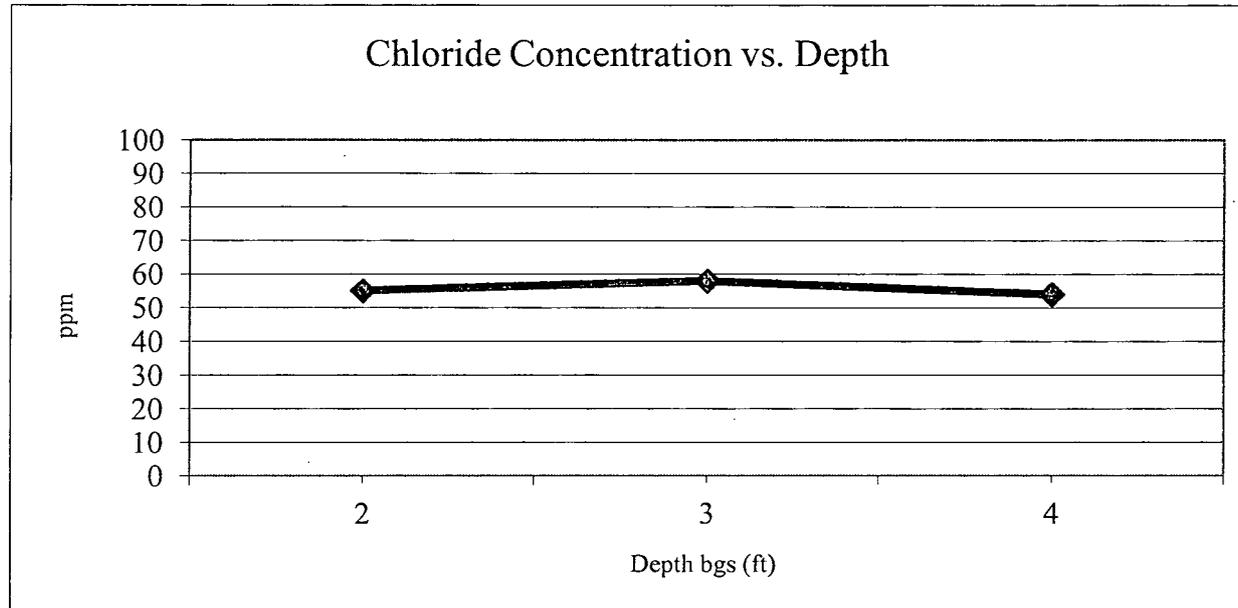
EME Jct. P-22

Unit 'P', Sec. 22, T19S, R36E

Backhoe samples at junction (source)

| Depth bgs (ft) | [Cl ⁻] ppm |
|----------------|------------------------|
| 2 | 55 |
| 3 | 58 |
| 4 | 54 |

Groundwater = 49 ft





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

REVEGETATION FORM

1. General Information

| | | | | | | |
|----------------------------------|---------------|------------------|---|---------------|-----------------------|--------------------------|
| Site name: EME JCT. P-22 | | | | | | |
| U/L P | Section 22 | Township T19S | Range R36E | County LEA | Latitude 32*38.419 | Longitude 103*20.244' |
| Contact Name: Bruce Baker | | | | | | |
| Email: bbaker@rice-ecs.com | | | | | | |
| Site size: 30X21 630 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 checked="" type="checkbox"/> | Depth (in): | Rollerpack <input type="checkbox"/> |
| Date completed: | | | | | |

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: DOOM MIX | Seeding date: 8-4-2011 |
| Broadcast <input checked="" type="checkbox"/> | | | |
| Method: | | | |
| 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 Eganis | Title: Environmental Tech | Date: 8-4-2011 |
| Signature: Robert Eganis | | |

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