

1R - 427-388

REPORTS

DATE:

4-10-12

1R427-388

RECEIVED OGD

2012 MAY -1 P 1:52

EME N-35 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 N-35 EOL: UL/N, Sec. 35, 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 N-35 EOL junction box. The site is located in UL/N, Sec. 35, T19S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 64 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 10x10x12-ft deep excavation. Each sample was field titrated for chlorides, resulting in low concentrations, and field screened using a PID for hydrocarbons, resulting in some slightly elevated concentrations. The excavated soil was blended on site and representative samples were collected from the blended backfill, the bottom of the excavation, and the excavation walls. The representative samples were sent to a commercial laboratory for analysis of chloride, and TPH. The 4-wall composite sample resulted in a chloride concentration of 272 mg/kg, a gasoline range organics (GRO) concentration of <50 mg/kg, and a diesel range organics (DRO) concentration of 392 mg/kg. The bottom composite sample resulted in a chloride concentration of 32 mg/kg, a GRO concentration of <50 mg/kg, and a DRO concentration of 603 mg/kg. The blended backfill sample resulted in a chloride concentration of 48 mg/kg, a GRO concentration of <50 mg/kg, and a DRO concentration of 295 mg/kg. The excavated soil was backfilled with the blended backfill to ground surface and contoured to the surrounding area. On 12/20/2011, 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 stylized, flowing script.

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		
Eunice Monument Eumont (EME)	N-35 EOL	N	35	19S	36E	Lea	Length	Width	Depth
							Eliminated		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ DLD Corporation _____ OTHER _____

Depth to Groundwater _____ 64 _____ feet NMOCD SITE ASSESSMENT RANKING SCORE: _____ 10 _____

Date Started _____ 8/9/2011 _____ Date Completed _____ 12/20/2011 _____ OCD Witness _____ No _____

Soil Excavated _____ 44.4 _____ cubic yards Excavation Length _____ 10 _____ Width _____ 10 _____ Depth _____ 12 _____ feet

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

FINAL ANALYTICAL RESULTS: Sample Date _____ 11/29/2011 _____ Sample Depth _____ 12' _____

Procure 5-point composite sample of bottom and 4-point composite sample of sidewalls. 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
4-WALL COMP.	5.6	<50.0	392	272
BOTTOM COMP.	39.7	<50.0	603	32
BLENDED BACKFILL	5.9	<50.0	295	48

CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
background	6"	149
4-WALL Comp	n/a	215
Bottom Comp	12'	148
Blended Backfill	n/a	112
Vertical delineation trench at 5' east of the former junction (source)	2'	82
	4'	113
	6'	78
	8'	89
	10'	102
	12'	81

General Description of Remedial Action: This junction box 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 producing a 10x10x12 ft deep excavation. Chloride field tests were performed on soil samples which yielded low chloride. Organic vapors were measured using a PID which low concentrations. The excavated soil was blended on site and representative composite samples were collected from the excavation walls, the excavation bottom, and the blended backfill. The samples were sent to a commercial laboratory for analysis of chloride and TPH. Lab analysis yielded low chloride concentrations and TPH concentrations within NMOCD guidelines. The excavation was backfilled with the blended soil to ground surface and contoured to the surrounding area. On 12/20/2011, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity.

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* _____
PROJECT LEADER _____ Zach Conder _____ SIGNATURE _____ *Zach Conder* _____

COMPANY _____ RICE OPERATING COMPANY _____
DATE _____ 9-10-12 _____

EME N-35 EOL

Unit N, Section 35, T19S, R36E



Excavating site, facing west

8.9.11



Collecting sample, facing southwest

11.29.11



Seeding site, facing east

12.20.11



Site complete, facing west

12.20.11



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

December 02, 2011

Hack Conder

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: EME N-35 EOL (19/36)

Enclosed are the results of analyses for samples received by the laboratory on 11/29/11 15:47.

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,

A handwritten signature in cursive script, appearing to read "Celey D. Keene".

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: 11/29/2011
 Reported: 12/02/2011
 Project Name: EME N-35 EOL (19/36)
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 11/29/2011
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: 5 PT. BOTTOM COMP (H102573-01)

Chloride, SM4500CI-B		mg/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	11/30/2011	ND	432	108	400	0.00	
TPH 8015M		mg/kg	Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<50.0	50.0	12/01/2011	ND	170	85.1	200	1.77	
DRO >C10-C28	603	50.0	12/01/2011	ND	176	87.8	200	0.0911	
Surrogate: 1-Chlorooctane	88.5 %	55.5-154							
Surrogate: 1-Chlorooctadecane	102 %	57.6-158							

Sample ID: 4 WALL COMPOSITE (H102573-02)

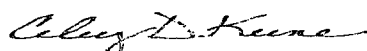
Chloride, SM4500CI-B		mg/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	272	16.0	11/30/2011	ND	432	108	400	0.00	
TPH 8015M		mg/kg	Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<50.0	50.0	12/01/2011	ND	170	85.1	200	1.77	
DRO >C10-C28	392	50.0	12/01/2011	ND	176	87.8	200	0.0911	
Surrogate: 1-Chlorooctane	95.6 %	55.5-154							
Surrogate: 1-Chlorooctadecane	83.9 %	57.6-158							

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Cardinal Laboratories

* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

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

 Received: 11/29/2011
 Reported: 12/02/2011
 Project Name: EME N-35 EOL (19/36)
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 11/29/2011
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: BLENDED BACKFILL (H102573-03)

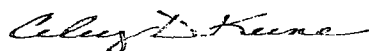
Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	11/30/2011	ND	432	108	400	0.00		
TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<50.0	50.0	12/01/2011	ND	170	85.1	200	1.77		
DRO >C10-C28	295	50.0	12/01/2011	ND	176	87.8	200	0.0911		
Surrogate: 1-Chlorooctane	73.8 %	55.5-154								
Surrogate: 1-Chlorooctadecane	58.9 %	57.6-158								

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* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

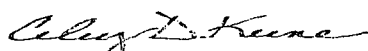
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received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

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Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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

[illegible]

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

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO : 930360	EXPIRATION DATE: 5/24/2013
METER READING ACCURACY: 100 PPM	

ACCURACY : +/- 2%

COMPANY
Rice

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	N-35 EOL	N	35	19S	36E

SAMPLE ID	PID	SAMPLE ID	PID
5 Pt. Bottom Composite	39.7		
4 Wall Composite	5.6		
Blended Backfill	5.9		

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

SIGNATURE:

Robert Jones

DATE: 11/29/2011

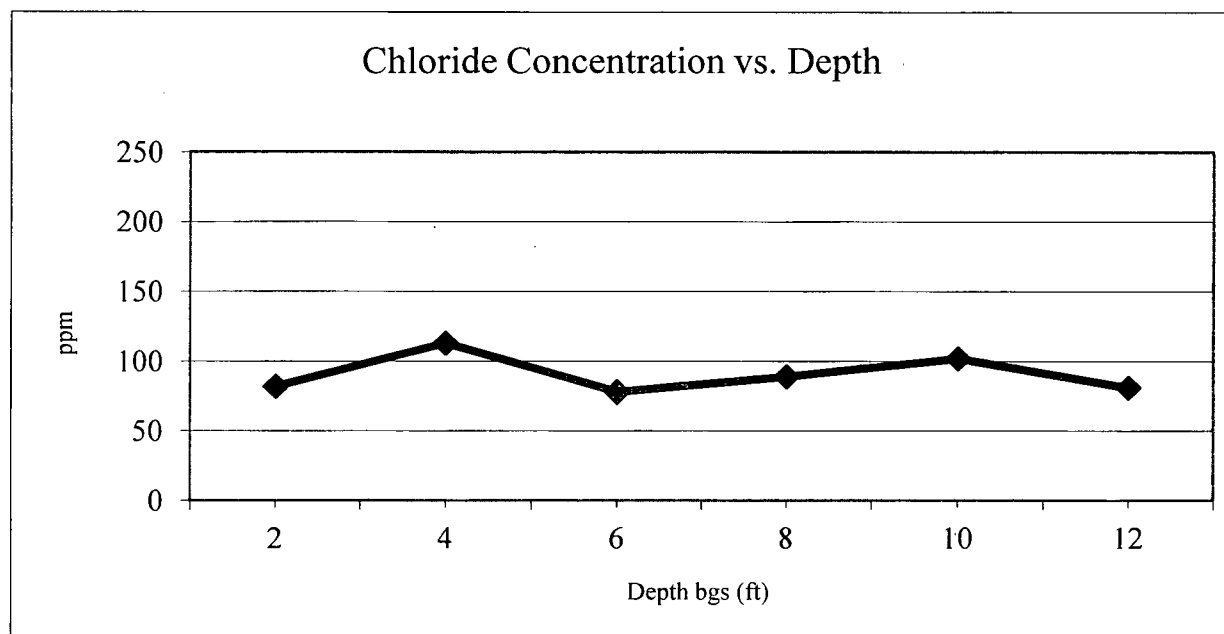
EME N-35 EOL

Unit 'N', Sec. 35, T19S, R36E

Backhoe samples at 5' east of the junction (source)

Depth bgs (ft)	[Cl ⁻] ppm
2	82
4	113
6	78
8	89
10	102
12	81

Groundwater = 64 ft





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

REVEGETATION FORM

1. General Information

Site name: EME N-35 EOL						
U/L N	Section 35	Township 19S	Range 36E	County Lea	Latitude W 103° 19.601'	Longitude N 32° 36.807'
Contact Name: Hack Conder						
Email: hconder@riceswd.com						
Site size: 7752 sq. ft.			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 checked="" 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: 12/20/2011					

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: 8 lbs Blue Grama / 8lbs Winter Wheat	Seeding date: 12/20/2011
Broadcast <input checked="" type="checkbox"/>			
Method: By Hand			
Soil conditions during seeding: Dry <input checked="" type="checkbox"/> Damp <input type="checkbox"/> Wet <input type="checkbox"/>			
Photos attached <input type="checkbox"/>	Observations: Raked Seed.		
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: 12/20/2011
Signature:		

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