

1R - 426-309

REPORTS

DATE:

3-22-12

1R426-309

RECEIVED OOD

2012 MAY -1 P 1:50

BD Jct. P-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
BD Jct. P-2: UL/P, Sec. 2, T23S, R37E
RICE Operating Company – Blinebry-Drinkard SWD System

Mr. Hansen:

Rice Operating Company (ROC) is the service provider (agent) for the BD 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-2 junction box. The site is located in UL/P, Sec. 2, T23S, R37E. 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 5x3x10-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 10-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 48 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The excavated soil was returned to the site and contoured to the surrounding area. On 11/10/2011, 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 screenings, 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". The signature is fluid and cursive, with a long 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 5'	Width 5'	Depth 5'
Blinebry-Drinkard (BD)	Jct. P-2	P	2	23S	37E	Lea	Eliminated		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER Walco Ranch, LLC OTHER _____

Depth to Groundwater 64 feet NMOCD SITE ASSESSMENT RANKING SCORE: 30*

Date Started 4/4/2011 Date Completed 5/24/2011 OCD Witness No

Soil Excavated 5.6 cubic yards Excavation Length 5 Width 3 Depth 10 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 4/4/2011 Sample Depth 10'

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 10' GRAB	0.4	<10.0	<10.0	48

CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
background	6"	113
vertical delineation trench at the junction (source)	6'	138
	7'	142
	8'	147
	9'	153
	10'	147

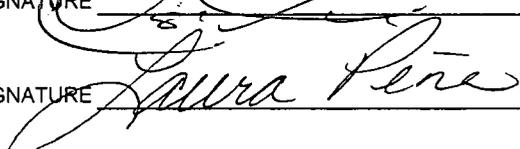
General Description of Remedial Action: This junction was eliminated during the pipeline replacement/upgrade program. After the former junction box was removed, an investigation was conducted using a backhoe to collect soil samples at regular intervals creating a 5X3X10-ft. deep excavation. Chloride 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, 10 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 11/10/2011, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

*Windmill 1,994' north

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  COMPANY RICE OPERATING COMPANY

PROJECT LEADER Zach Conder SIGNATURE  DATE 3-22-12

BD Jct. P-2

Unit P, Section 2, T23S, R37E



Collecting sample, facing west

4.4.11



Final Excavation

4.4.11



Spreading seed, facing south

11.10.11



Raking in seed, facing east

11.10.11

April 07, 2011

Hack Conder
Rice Operating Company
112 W. Taylor
Hobbs, NM 88240

RE: BD JCT P-2

Enclosed are the results of analyses for samples received by the laboratory on 04/04/11 16:20.

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

Received:	04/04/2011	Sampling Date:	04/04/2011
Reported:	04/07/2011	Sampling Type:	Soil
Project Name:	BD JCT P-2	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: SOURCE GRAB @ 10' (H100664-01)

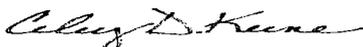
Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	04/05/2011	ND	416	104	400	0.00		
TPH 8015M		mg/kg		Analyzed By: AB						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	04/05/2011	ND	207	103	200	2.37		
DRO >C10-C28	<10.0	10.0	04/05/2011	ND	177	88.7	200	17.7		
Surrogate: 1-Chlorooctane	102 %	70-130								
Surrogate: 1-Chlorooctadecane	98.0 %	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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Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240
 (575) 393-2326 FAX (575) 393-2476

Company Name: <u>RICE OPERATING</u>		BILL TO		ANALYSIS REQUEST														
Project Manager:		P.O. #:		<div style="writing-mode: vertical-rl; transform: rotate(180deg); font-size: 2em; font-weight: bold;"> C1-77100004 </div>														
Address: <u>122 W. TAYLOR</u>		Company:																
City: <u>HOBBBS</u> State: Zip:		Attn:																
Phone #: Fax #:		Address:																
Project #: Project Owner:		City:																
Project Name: <u>BD Jet P-2</u>		State: Zip:																
Project Location: <u>BD Jet P-2</u>		Phone #:																
Sampler Name: <u>Jordan Woodfin</u>		Fax #:																
FOR LAB USE ONLY	Lab I.D.	Sample I.D.	(C)RAB OR (C)OMP. # CONTAINERS	MATRIX GROUNDWATER WASTEWATER SOIL OIL SLUDGE OTHER:	PRESERV ACID/BASE: ICE / COOL OTHER:	SAMPLING DATE TIME												
	<u>HDD1041</u>	<u>Source grab @ 101</u>	<u>9</u>			<u>4/26/04</u> <u>12:17</u>												

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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 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:	Date: <u>4-26-04</u>	Received By: <u>Godi Nenson</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) Sampler - UPS - Bus - Other:	Sample Condition Cool Intact <input type="checkbox"/> Yes <input type="checkbox"/> No	CHECKED BY: (Initials) <u>JW</u>	REMARKS: <u>BBAKER@RICE-ECG.COM</u> <u>JWOODFIN@</u> <u>LTJONES@RICESUD.COM</u>	

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

RICE OPERATING COMPANY

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

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO : 927041	EXPIRATION DATE: 11-16-12
METER READING ACCURACY: 100	

ACCURACY : +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
BD	P-2	P	2	23S	37E

SAMPLE ID	PID	SAMPLE ID	PID
Background	0.1		
Source			
6'	0.4		
7'	0.4		
8'	0.2		
9'	0.1		
10'	0.4		

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

SIGNATURE:

DATE: 4-4-11

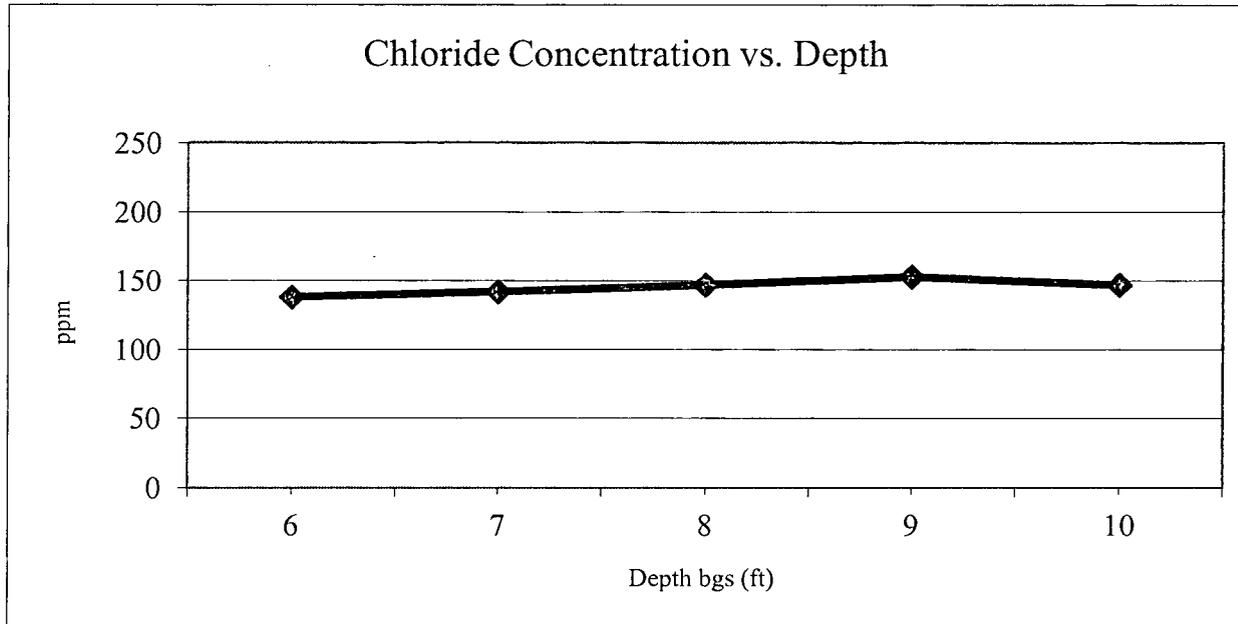
BD Jct. P-2

Unit 'P', Sec. 2, T23S, R37E

Backhoe samples at junction (source)

Depth bgs (ft)	[Cl ⁻] ppm
6	138
7	142
8	147
9	153
10	147

Groundwater = 64 ft





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

REVEGETATION FORM

1. General Information

Site name: BD Jct. P-2						
U/L P	Section 2	Township 23S	Range 37E	County Lea	Latitude 32°19'40.077" N	Longitude 103°7'32.48" W
Contact Name: Bruce Baker						
Email: bbaker@rice-ecs.com						
Site size: 2,228 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 checked="" type="checkbox"/>	Bioremediated <input type="checkbox"/>	Imported <input checked="" 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: 6/27/2011				

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: 2 lbs. Boyd Johnston Mix	Seeding date: 11/10/2011
Broadcast <input checked="" type="checkbox"/>			
Method: Portable Seeder			
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: 2			

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: 11/10/2011
Signature:		

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