

1R - 427-403

REPORTS

DATE:

3-15-13

1R457-403

EME O-20 EOL

2012

CLOSURE

RICE *Operating Company*

122 West Taylor • Hobbs, New Mexico 88240

Phone: (575) 393-9174 • Fax: (575) 397-1471

April 1, 2013

RECEIVED

APR 2 2013

Mr. Edward Hansen
New Mexico Energy, Minerals, & Natural Resources
Oil Conservation Division, Environmental Bureau
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

RE: Termination Request
EME O-20 EOL: UL/O, Sec. 20, T21S, 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 2012, ROC initiated work on the former O-20 EOL. The site is located in UL/O, Sec. 20, T21S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 225 +/- 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 chlorides and slightly elevated concentrations of hydrocarbons. The 12-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 80 mg/kg, a gasoline range organics (GRO) concentration below detectable limits and a diesel range organics (DRO) concentration of 1,860 mg/kg. The excavated soil was returned to the excavation and contoured to the surrounding area. On 11/8/2012, 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 location plat, 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

**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)	O-20 EOL	O	20	21S	36E	Lea	Eliminated		

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

Depth to Groundwater 225 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 3/14/2012 Date Completed 3/14/2012 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 3/14/2012 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	30.1	<100	1860	80

CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
background	6"	90
vertical delineation trench at the junction (source)	7'	148
	8'	121
	9'	150
	10'	123
	11'	148
	12'	148

General Description of Remedial Action: This junction 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, 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 elevated concentrations.

The deepest sample, 12 ft. below ground surface (BGS) was sent to a commercial laboratory for analysis of chloride and TPH, which confirmed low concentrations of chloride and elevated concentrations of TPH. The excavation was backfilled with excavated soil to ground surface and contoured to the surrounding area. On 11/8/2012, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

enclosures: site location map, photos, lab results, PID (field) screenings, chloride graph, revegetation form

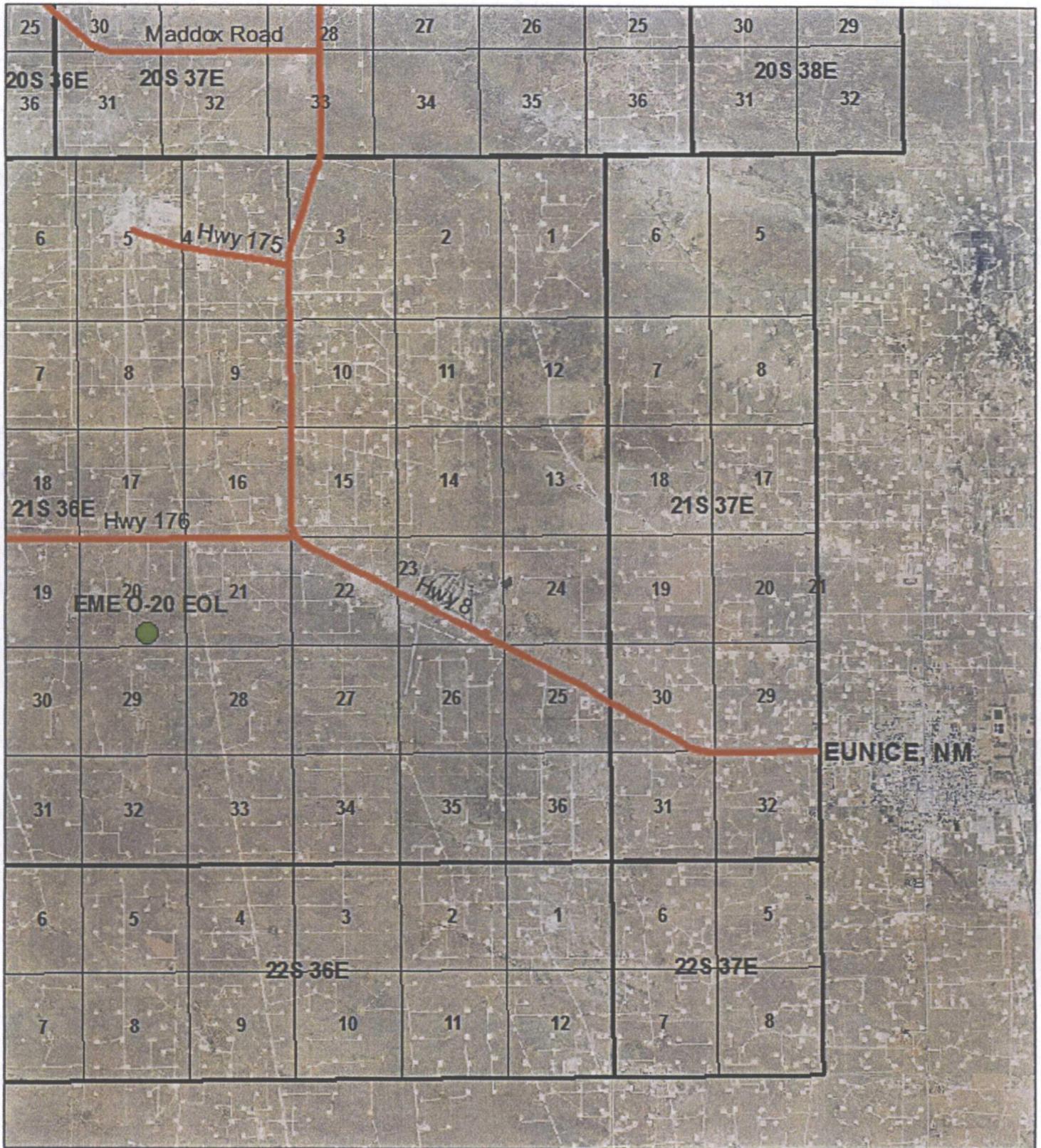
I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

REPORT

ASSEMBLED BY Laura Peña SIGNATURE *Laura Peña* COMPANY Rice Operating

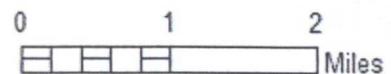
SITE SUPERVISOR Oscar Frayre SIGNATURE Not Available COMPANY Rice Environmental Consulting & Safety

PROJECT LEADER Zach Conder SIGNATURE *Z. Conder* DATE 3-15-13



EME O-20 EOL

UL/O SECTION 20
T-21-S R-36-E
LEA COUNTY, NM



Drawing date: 11/7/12
Drafted by: Tony Grieco

EME O-20 EOL

UL/O Sec.20 (T21S-R36E)



Excavating site, facing north

3/14/2012



Collecting sample, facing east

3/14/2012



Seeding site, facing south

11/8/2012



Site complete, facing east

11/8/2012



March 16, 2012

ZACH CONDER

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: EME O-20 EOL (21/36)

Enclosed are the results of analyses for samples received by the laboratory on 03/14/12 16:25.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

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 (V1, 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
 ZACH CONDER
 112 W. Taylor
 Hobbs NM, 88240
 Fax To: (575) 397-1471

Received:	03/14/2012	Sampling Date:	03/14/2012
Reported:	03/16/2012	Sampling Type:	Soil
Project Name:	EME O-20 EOL (21/36)	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NONE GIVEN		

Sample ID: SOURCE @ 12' (H200644-01)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	80.0	16.0	03/15/2012	ND	400	100	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	<100	100	03/15/2012	ND	249	124	200	10.9		
DRO >C10-C28	1860	100	03/15/2012	ND	208	104	200	11.7		

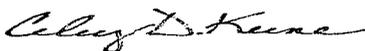
Surrogate: 1-Chlorooctane	115 %	55.5-154
Surrogate: 1-Chlorooctadecane	138 %	57.6-158

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Cardinal Laboratories

*=Accredited Analyte

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 client for 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 thirty (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 the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

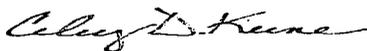
- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- ** Samples not received at proper temperature of 6°C or below.
- *** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
- Samples reported on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

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 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 checked="" type="checkbox"/>	MODEL: PGM 7300	SERIAL NO: 590-902072

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: HAL-248-100-1	EXPIRATION DATE: 7/1/2015
METER READING ACCURACY: 100 ppm	

ACCURACY : +/- 2%

COMPANY
Rice Operating Company

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	O-20 EOL	O	20	21S	36E

SAMPLE ID	PID	SAMPLE ID	PID
Background @ 6"	3.8		
Source @ 7'	466.5		
8'	42.4		
9'	122.3		
10'	84.7		
11'	53.8		
12'	30.1		

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

SIGNATURE: Not Available

DATE: 3/14/2012

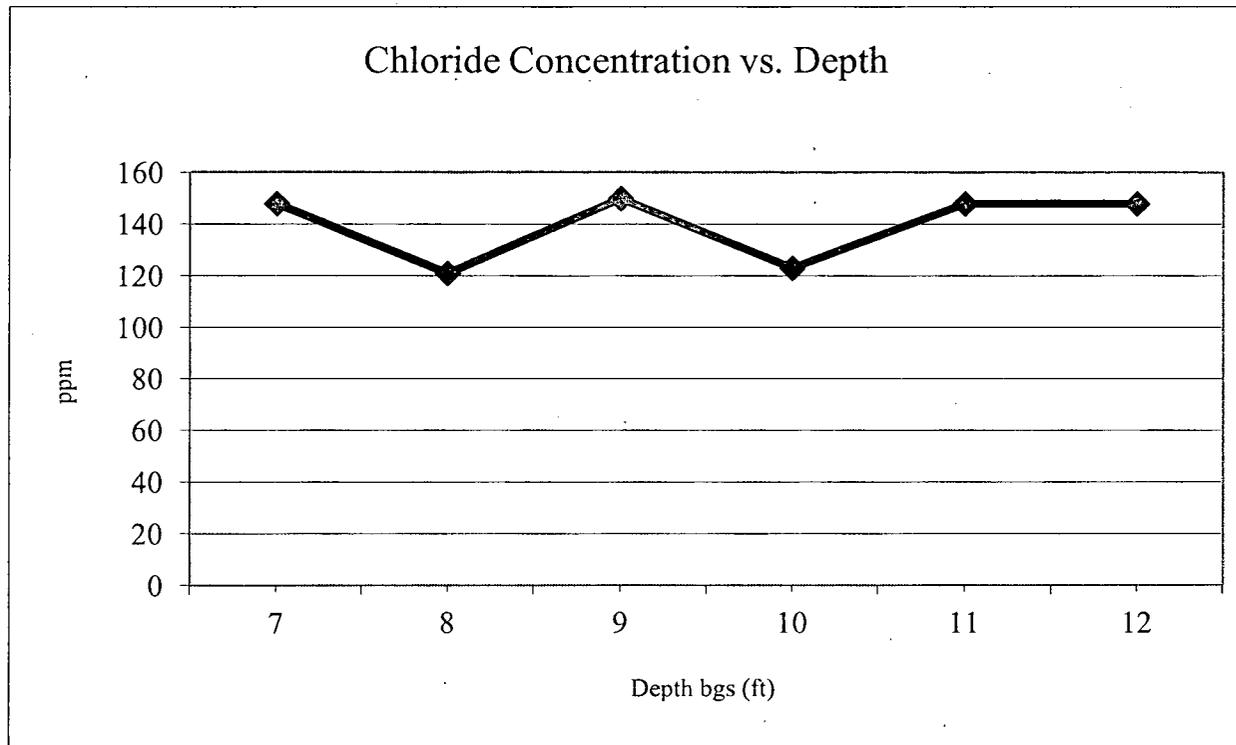
EME O-20 EOL

Unit 'O', Sec. 20, T21S, R36E

Backhoe samples at junction (source)

Depth bgs (ft)	[Cl ⁻] ppm
7	148
8	121
9	150
10	123
11	148
12	148

Groundwater = 225 ft





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

REVEGETATION FORM

1. General Information

Site name: EME O-20 EOL						
U/L O	Section 20	Township T21S	Range R36E	County LEA	Latitude 32*27.552'	Longitude 103*17'.06.0
Contact Name: ZACHARY CONDER						
Email: zconder@rice-ecs.com						
Site size: 25'X55' Square feet: 1900				Map detail of site attached <input checked="" type="checkbox"/>		
Additional information:						

2. Soils

**Do not rip caliches 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 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):	Roller pack <input type="checkbox"/>
Date completed: 3-14-2012					

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 LBS WINTER RYE, 2LBS. BLUE GRAMA Seeding date: 11-8-2012
Broadcast <input checked="" type="checkbox"/>		
Method: MECHANICAL HAND HELD 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:		

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: <i>Edwardo Gonzalez</i>	Title: Environmental Tech	Date: 11-8-2012
Signature: <i>Edwardo Gonzalez</i>		