1R-427-404

REPORTS

DATE:

3-15-13

IR427-404

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

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 P-20 EOL: UL/P, Sec. 20, T19S, R37E
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 P-20 EOL. The site is located in UL/P, Sec. 20, T19S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 41 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 3x7x6-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 6-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of <16 mg/kg and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The excavated soil was returned to the excavation and contoured to the surrounding area. On 8/9/2012, 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

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)	P-20 EOL	P	20	19S	37E	Lea	Eliminated		

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

Depth to Groundwater 41 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 7/18/2012 Date Completed 8/9/2012 OCD Witness No

Soil Excavated 4.7 cubic yards Excavation Length 3 Width 7 Depth 6 feet

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

FINAL ANALYTICAL RESULTS: **Sample Date** 8/9/2012 **Sample Depth** 6'

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 6' GRAB	0.1	<10	<10	<16

CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
background	6"	117
vertical delineation trench at the junction (source)	2'	589
	3'	608
	4'	483
	5'	489
	6'	528

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 3x7x6 ft. deep excavation. Chloride field tests performed on each sample yielded elevated concentrations. Organic vapors were measured using a PID which yielded low concentrations. The deepest sample, 6 ft. below ground surface (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 8/9/2012, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

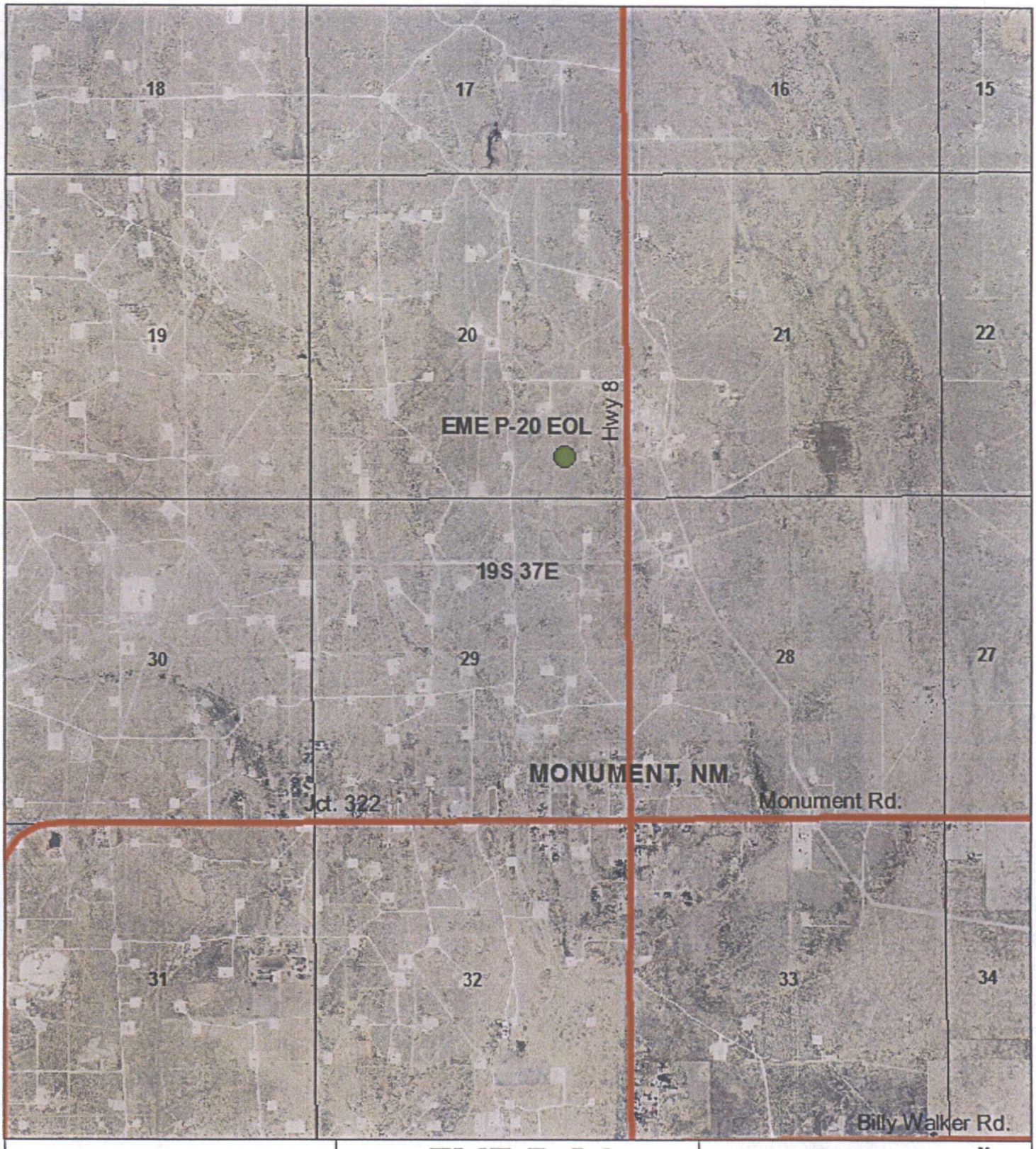
enclosures: site location map, photos, lab results, PID (field) screenings, chloride graph, revegetation form

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 Dustin Yarbrough SIGNATURE Not Available COMPANY Rice Environmental Consulting & Safety

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



RICE ENVIRONMENTAL CONSULTING & SAFETY, LLC

RECS

EME P-20 EOL

UL/P SECTION 20
T-19-S R-37-E
LEA COUNTY, NM

N
W E
S

0 0.25 0.5
Miles

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

EME P-20 EOL

UL/P Sec.20 (T19S-R37E)

Excavating Site 8/8/2012

Backfilling site 8/9/2012

Seeding site 8/9/2012

Site complete 8/9/2012

CARDINAL Laboratories

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

August 14, 2012

ZACH CONDER

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: EME P-20 EOL 19/37

Enclosed are the results of analyses for samples received by the laboratory on 08/09/12 16:30.

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 accreditated 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

Celey D. Keene

Lab Director/Quality Manager

COPY

CARDINAL Laboratories

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

Analytical Results For:

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

Received:	08/09/2012	Sampling Date:	08/09/2012
Reported:	08/14/2012	Sampling Type:	Soil
Project Name:	EME P-20 EOL 19/37	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: SOURCE @ 6' (H201853-01)

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	08/13/2012	ND	400	100	400	3.92	

TPH 8015M mg/kg **Analyzed By: MS**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/13/2012	ND	188	94.1	200	0.729	
DRO >C10-C28	<10.0	10.0	08/13/2012	ND	190	95.1	200	0.877	

Surrogate: 1-Chlorooctane	*115 %*	*65.2-140*
Surrogate: 1-Chlorooctadecane	*118 %*	*63.6-154*

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Cardinal Laboratories

*=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Notes and Definitions

QM-4X	The spike recovery was outside of QC acceptance limits for the MS and/or MSD due to analyte concentration at 4 times or greater the spike concentration. The QC batch was accepted based on LCS and/or LCSD recoveries within the acceptance limits.
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

Cardinal Laboratories

*=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL LABORATORIES

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name: RICE Operating		BILL TO	
Project Manager: Zach Conder		P.O. #:	
Address: 112 W. Taylor		Company:	
City: Hobbs	State: NM Zip: 88240	Attn:	
Phone #:	Fax #:	Address:	
Project #:	Project Owner:	City:	
Project Name:		State: Zip:	
Project Location: EME P-20 EOL 19.37		Phone #:	
Sampler Name: Dusty Washburn		Fax #:	

FOR LAB USE ONLY				MATRIX						PRESERV.			SAMPLING		ANALYSIS REQUEST										
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :	DATE	TIME	Chlorides	TPH 8015 M	BTEX	Texas TPH	Complete Cations/Anions	TDS					
H201853																									
-1	Source@1'	G	1			✓					✓		8/9/12	1:00	✓	✓									

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 made 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 consequental 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: 8-9-12	Received By:	Phone Result: ☐ Yes ☑ No Add'l Phone #:
	Time: 4:30pm		Fax Result: ☐ Yes ☑ No Add'l Fax #:
Relinquished By:	Date:	Received By:	REMARKS: email results Zconder@rice-ecs.com; Bbaker@rice-ecs.com; hconder@rice-ecs.com; Lweinheimer@rice-ecs.com; kjones@riceswd.com; dwyarbrough@rice-ecs.com
	Time:		
Delivered By: (Circle One) Sampler - UPS - Bus - Other:		Sample Condition Cool: ☑ Yes ☐ No Intact: ☑ Yes ☐ No	CHECKED BY: (Initials)

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

#426

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 NO.			
		MODEL: PGM 7300	SERIAL NO: 590-000508
		MODEL: PGM 7300	SERIAL NO: 590-000504
		MODEL: PGM 7320	SERIAL NO: 592-903318
	x	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	P-20 EOL	P	20	19S	37E

SAMPLE ID	PID	SAMPLE ID	PID
Background @ 6"	0.4		
Source @ 2'	0.8		
3'	0.3		
4'	0.3		
5'	0.2		
6'	0.1		

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

SIGNATURE: Not Available DATE: 8/9/2012

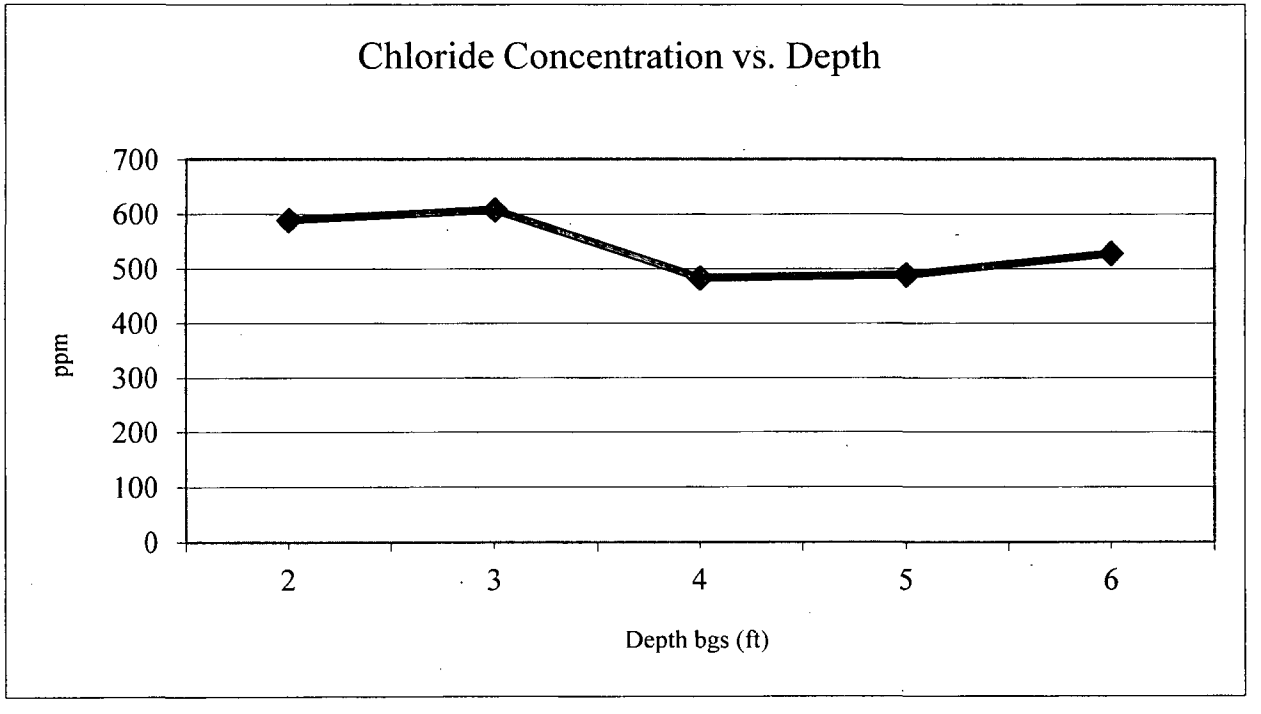
EME P-20 EOL

Unit 'P', Sec. 20, T19S, R37E

Backhoe samples at junction (source)

Depth bgs (ft)	[Cl] ppm
2	589
3	608
4	483
5	489
6	528

Groundwater = 41 ft



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

REVEGETATION FORM

1. General Information

Site name	EME P-20 EOL					
U/L P	Section 20	Township 19S	Range 37E	County Lea	Latitude 32°38'32.6" N	Longitude 103°16'17.37" W
Contact Name:	**Zach Conder**					
Email:	**zconder@rice-ecs.com**					
Site size:	**60** square feet			Map detail of site attached ☐		
Additional information:						

2. Soils **Do not rip caliche subsoils; caliche rocks brought to the surface by ripping shall be removed.*

Salvaged from site ☒	Bioremediated ☐	Imported ☐	Blended ☐	Depth (in):
Texture: **Sandy**	Describe soil & subsoil:	**Sandy soils and caliche**		
Soil prep methods:	Rip ☐ Depth(in):	Disc ☐ Depth (in):		Rollerpack ☐
Date completed: **8/9/2012**				

3. Bioremediation

Fertilizer ☐	Hay ☐	Other ☐
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 ☒	Prescribed mix ☐	Seed mix name: **0.5 lb. Blue Grama**	Seeding date: **8/9/2012**
Broadcast ☒ Method: **Hand broadcast**			
Soil conditions during seeding:	Dry ☒	Damp ☐	Wet ☐
Photos attached ☐ Number of photos:	Observations:		

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: **Dustin Yarbrough**	Title: **Environmental Tech**	Date: **8/9/2012**
Signature: Not Available		

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