

**1R - 427-397**

**REPORTS**

**DATE:**

**3-4-13**

1R427-397

EME Jct. T-6

2012

RECEIVED

APR 2 2013

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

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 Jct. T-6: UL/T, Sec. 6, 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 T-6 junction box. The site is located in UL/T, Sec. 6, T21S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 152 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 3x7x9 ft deep excavation. Each sample was field titrated for chlorides, resulting in low chloride concentrations. The 8 ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 112 mg/kg and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The excavation was backfilled with the excavated soil to ground surface and contoured to the surrounding area. On 11/7/2012, 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, 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	Width	Depth
Eunice Monument Eumont (EME)	Jct. T-6	T	6	21S	36E	Lea	Eliminated		

LAND TYPE: BLM \_\_\_\_\_ STATE X FEE LANDOWNER \_\_\_\_\_ OTHER \_\_\_\_\_

Depth to Groundwater 152 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 5/30/2012 Date Completed 5/30/2012 OCD Witness No

Soil Excavated 7.0 cubic yards Excavation Length 3 Width 7 Depth 9 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 5/30/2012 Sample Depth 8'

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 8' GRAB		<10	<10	112

CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
background	6"	116
vertical delineation trench at the junction (source)	4'	141
	5'	172
	6'	234
	7'	242
	8'	205

**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 3x7x9 ft. deep excavation. Chloride field tests performed on each sample yielded concentrations similar to that of the background sample. The deepest sample, 8 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 11/7/2012, 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, 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  COMPANY Rice Operating

SITE SUPERVISOR Dustin Yarbrough SIGNATURE Not Available COMPANY Rice Environmental Consulting & Safety

PROJECT LEADER Zach Conder SIGNATURE  DATE 3-4-13



# EME Jct. T-6

UL/T Sec. 6 (T21S-R36E)



Site prior

5/30/2012



Excavating site, facing south

5/30/2012



Collecting sample, facing north

5/30/2012



Backfilling site, facing north

5/30/2012



Seeding site, facing north

11/7/2012



Site Complete, facing south

11/7/2012



June 05, 2012

ZACH CONDER

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: EME JCT T-6

Enclosed are the results of analyses for samples received by the laboratory on 06/01/12 15:35.

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](http://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,

Hope Moreno

Inorganic Technical Director

**Analytical Results For:**

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

Received:	06/01/2012	Sampling Date:	05/30/2012
Reported:	06/05/2012	Sampling Type:	Soil
Project Name:	EME JCT T-6	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: SOURCE @ 8' (H201235-01)**

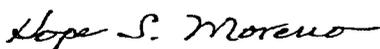
Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Chloride</b>	<b>112</b>	16.0	06/04/2012	ND	416	104	400	0.00		
TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	06/04/2012	ND	183	91.3	200	1.58		
DRO >C10-C28	<10.0	10.0	06/04/2012	ND	187	93.7	200	3.90		

<i>Surrogate: 1-Chlorooctane</i>	84.6 %	65.2-140
<i>Surrogate: 1-Chlorooctadecane</i>	96.5 %	63.6-154

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.



Hope Moreno, Inorganic Technical Director

**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

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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.

*Hope S. Moreno*

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Hope Moreno, Inorganic Technical Director



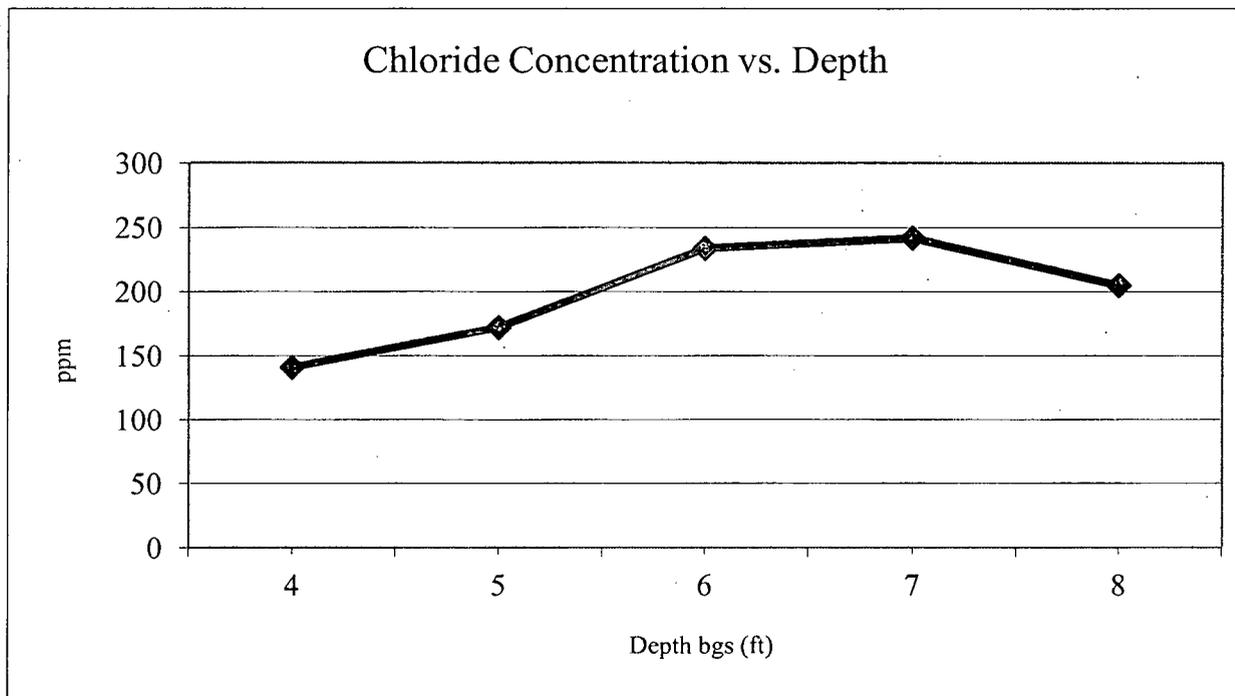
# EME Jct. T-6

Unit 'T', Sec. 6, T21S, R36E

*Backhoe samples at junction (source)*

Depth bgs (ft)	[Cl <sup>-</sup> ] ppm
4	141
5	172
6	234
7	242
8	205

Groundwater = 152 ft





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

## REVEGETATION FORM

### 1. General Information

Site name: EME JCT.T-6						
U/L T	Section 6	Township T21S	Range R36E	County LEA	Latitude 32*30'15.60"	Longitude 103*18'37.36"
Contact Name: ZACHARY CONDER						
Email: zconder@rice-ecs.com						
Site size: 20X50 Square feet: 1,000				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 type="checkbox"/>	Depth (in):	Roller pack <input type="checkbox"/>
Date completed: 5-30-2012					

### 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: 1 LBS. BLUE GRAMA, 1LBS. WINTER RYE Seeding date: 11-7-2012
Broadcast <input checked="" type="checkbox"/>		
Method: MECHANICAL HAND 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:		

### 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: <u>Edward Garcia</u>	Title: Environmental Tech	Date: 11-7-2012
Signature: _____		