

1R - 427-398

REPORTS

DATE:

3-4-13

1R427-398

EME K-17 EOL

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

RECEIVED

April 1, 2013

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 K-17 EOL: UL/K, Sec. 17, 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 K-17 EOL. The site is located in UL/K, Sec. 17, T21S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 215 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 7x3x9-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 9-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 192 mg/kg, a gasoline range organics (GRO) concentration below detectable limits and a diesel range organics (DRO) concentration of 11 mg/kg. The excavated soil was returned to the excavation and contoured to the surrounding area. On 11/15/2012, 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 final report, site location map, 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". 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)	K-17 EOL	K	17	21S	36E	Lea	Eliminated		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER Millard Deck Est. OTHER _____

Depth to Groundwater 215 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 11/14/2012 Date Completed 11/15/2012 OCD Witness No

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

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

FINAL ANALYTICAL RESULTS: Sample Date 11/14/2012 Sample Depth 9'

TPH and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines.

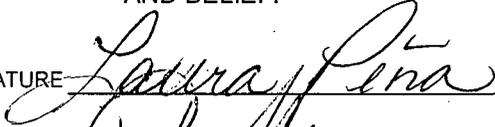
Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
SOURCE @ 9'	0.0	<10	11	192

CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
background	6"	87
vertical delineation trench at the junction (source)	5'	160
	6'	210
	7'	199
	8'	207
	9'	158

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 7x3x9 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, 9 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 11/15/2012, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

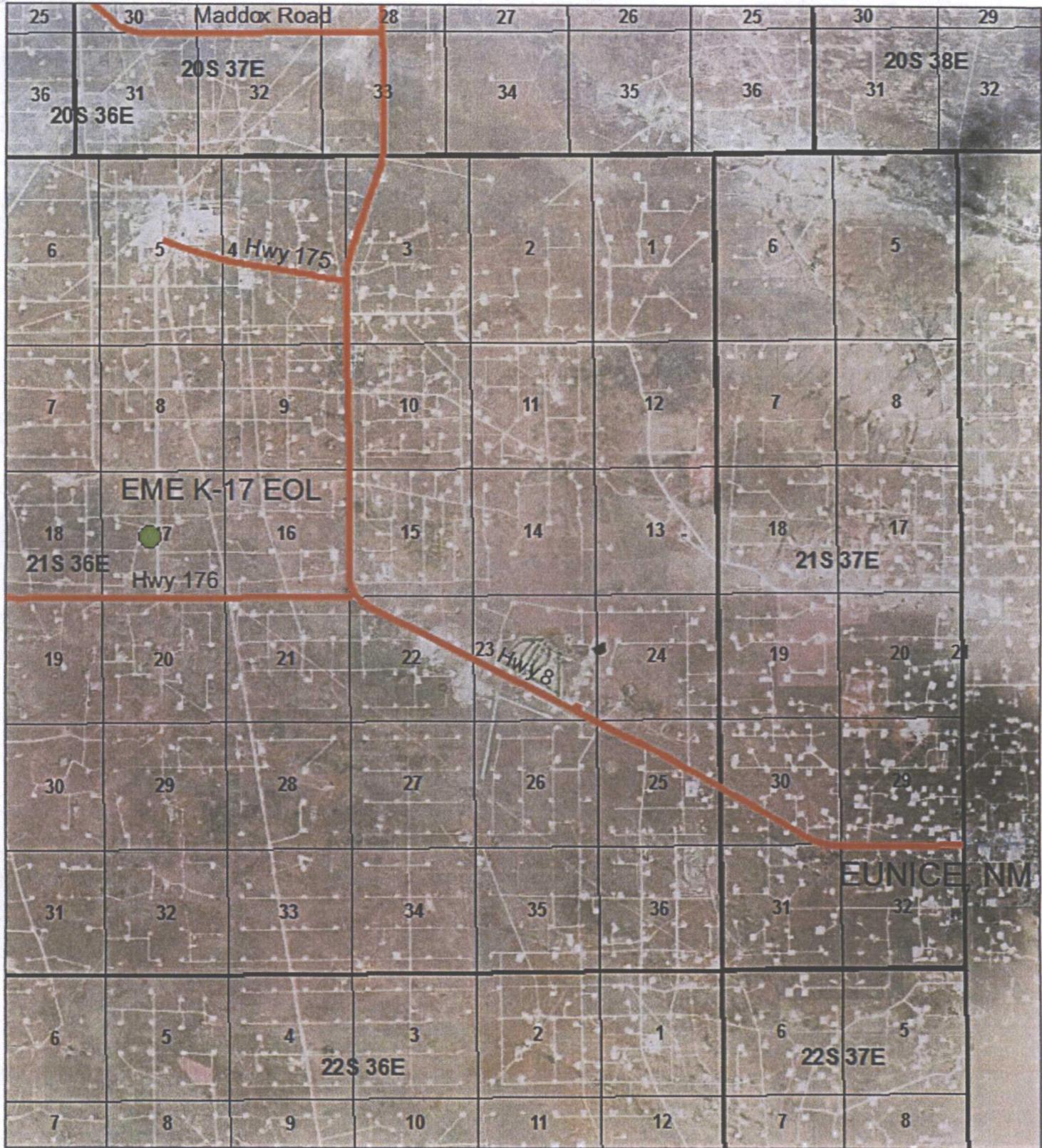
enclosures: site location map, photos, lab results, PID (field) screenings, chloride graph, revegetation form

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  COMPANY Rice Environmental Consulting & Safety

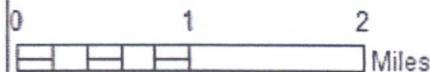
SITE SUPERVISOR Dyllan Yarbrough SIGNATURE  COMPANY Rice Environmental Consulting & Safety

PROJECT LEADER Zach Conder SIGNATURE  DATE 3-4-13



EME K-17 EOL

UL K SECTION 17
T-21-S R-36-E
LEA COUNTY, NM



Drawing date: 1/17/13
Drafted by: Tony Grieco

EME K-17 EOL
UL/K, Sec.17,T21S,R36E



Site prior, facing east

11/14/2012



Excavating site, facing west

11/14/2012



Collecting sample, facing south

11/14/2012



Seeding Site, facing east

11/15/2012



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

November 16, 2012

Bruce Baker
Rice Operating Company
112 W. Taylor
Hobbs, NM 88240

RE: EME K-17 EOL

Enclosed are the results of analyses for samples received by the laboratory on 11/14/12 16:07.

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,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style with a large, looped initial "C".

Celey D. Keene
Lab Director/Quality Manager

Analytical Results For:

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

Received:	11/14/2012	Sampling Date:	11/14/2012
Reported:	11/16/2012	Sampling Type:	Soil
Project Name:	EME K-17 EOL	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: 9' (H202764-01)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	192	16.0	11/15/2012	ND	416	104	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	11/15/2012	ND	187	93.7	200	1.91		
DRO >C10-C28	11.0	10.0	11/15/2012	ND	205	103	200	2.87		

Surrogate: 1-Chlorooctane	77.2 %	65.2-140
Surrogate: 1-Chlorooctadecane	84.0 %	63.6-154

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

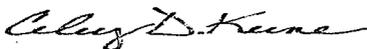
Notes and Definitions

- 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

Cardinal Laboratories

*=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: RICE		BILL TO		ANALYSIS REQUEST												
Project Manager:		P.O. #:														
Address:		Company:														
City:	State:	Zip:	Attn:													
Phone #:	Fax #:	Address:														
Project #:	Project Owner:		City:													
Project Name:			State:													Zip:
Project Location: Eme K-17 EOL			Phone #:													
Sampler Name:			Fax #:													
FOR LAB USE ONLY																
Lab I.D. W2027104	Sample I.D. 91	# CONTAINERS 1	MATRIX				PRESERV		SAMPLING		CI-TPH-					
			GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE/COOL					OTHER:	DATE

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 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: <i>[Signature]</i>	Date: 11/14/12	Received By: <i>[Signature]</i>	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
	Time: 4:07	Godi Benson	Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Relinquished By:	Date:	Received By:	REMARKS: Zack Conder Laura W Zack Conder Laura Penon Bruce Baker Amy Ruth	
Delivered By: (Circle One)	Sample Condition	CHECKED BY:		
Sampler - UPS - Bus - Other:	Cool Intact <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	(Initials) [Signature]		

† Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326

CHLORIDE CONCENTRATION CURVE

RICE Operating Company

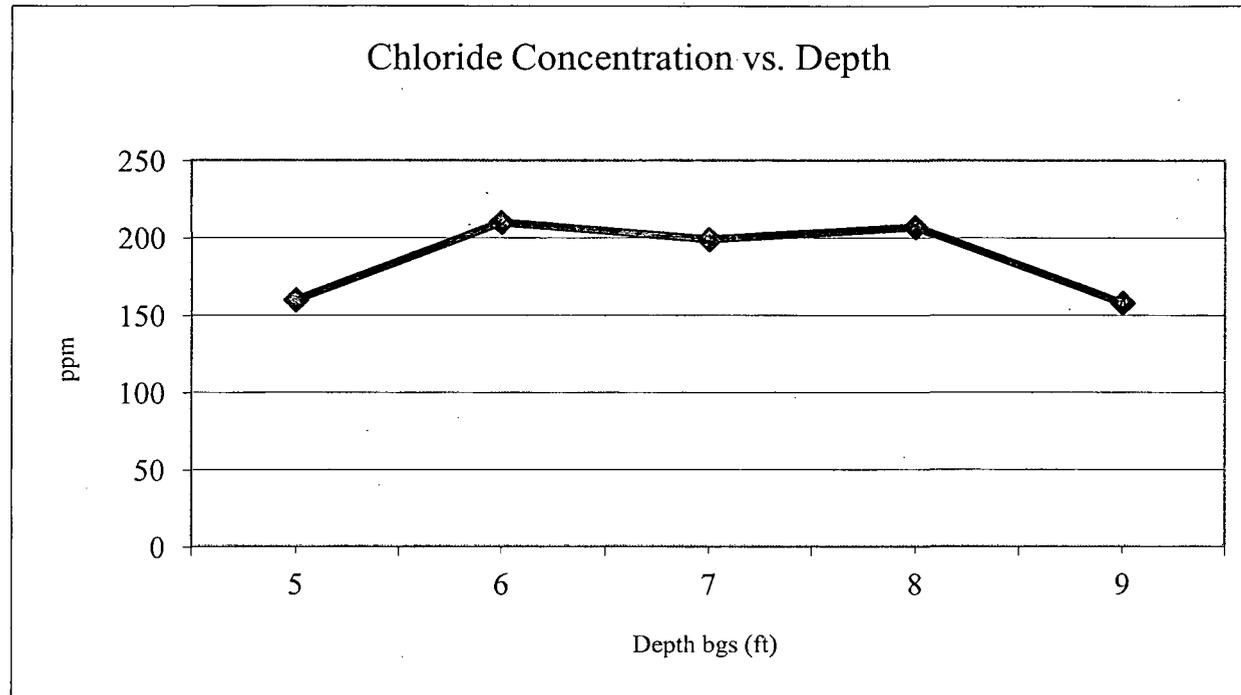
EME K-17 EOL

Unit 'K', Sec. 17, T21S, R36E

Backhoe samples at junction (source)

Depth bgs (ft)	[Cl] ppm
5	160
6	210
7	199
8	207
9	158

Groundwater = 215 ft.





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

REVEGETATION FORM

1. General Information

Site name: EME K-17 EOL						
U/L K	Section 17	Township 21S	Range 36E	County Lea	Latitude N 32°28'53.1"	Longitude W 103°17'51.2"
Contact Name: ZACHARY CONDER						
Email: zconder@rice-ecs.com						
Site size: 73x63 Square feet: 4,599				Map detail of site attached <input 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: 11/14/2012					

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: 2.5 lbs. Winter Rye, 2.5 lbs Blue Grama Seeding date: 11/15/2012
Broadcast <input 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 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: Dyllan Yarborough	Title: Environmental Tech	Date: 11/15/2012
Signature:		