

1R - 427-392

# REPORTS

DATE:

3-4-13

1R427-392

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APR 2 2012

CE Conservation Division  
1620 G. St. Harold's Dr.  
Ft. Collins, CO

EME H-23 EOL

2012

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 H-23 EOL: UL/H, Sec. 23, T20S, 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 H-23 EOL junction box. The site is located in UL/H, Sec. 23, T20S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 106 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 30x30x12 ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons. The excavated soil was blended on site and representative composite samples of the excavation bottom and excavation walls were sent to a commercial laboratory for analysis of chloride and TPH, resulting in a 4-wall chloride concentration of 608 mg/kg, a gasoline range organics (GRO) concentration of 69.8 mg/kg and a diesel range organics (DRO) concentration of 469 mg/kg. The bottom sample resulted in a chloride concentration of 144 mg/kg, a GRO concentration below detectable limits, and a DRO concentration of 793 mg/kg. On 7/17/2012, a 20-mil reinforced plastic liner was installed at 12 ft below ground surface (BGS). The remaining excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area. On 8/22/2012, 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, cross-section diagram, 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", written in a cursive style.

Hack Conder  
Environmental Manager

enclosures

**RICE OPERATING COMPANY  
JUNCTION BOX CLOSURE REPORT**

**BOX LOCATION**

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
							Length	Width	Depth
Eunice Monument Eumont (EME)	H-23.EOL	H	23	20S	36E	Lea	Eliminated		

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

Depth to Groundwater 106 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 7/2/2012 Date Completed 7/20/2012 OCD Witness No

Soil Excavated 400.0 cubic yards Excavation Length 30 Width 30 Depth 12 feet  
South Monument

Soil Disposed 684 cubic yards Offsite Facility Waste Facility Location Monument, NM

**FINAL ANALYTICAL RESULTS:** Sample Date 7/16/2012 Sample Depth 12'

Procure 5-point composite sample of bottom and 4-point composite sample of sidewalls. 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
4-WALL COMP.	46.7	69.8	469	608
BOTTOM COMP.	1025	<50	793	144

CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
background	6"	153
4-WALL Comp	n/a	210
Bottom Comp	12'	568
Vertical delineation trench at the former junction (source)	6'	200
	7'	229
	8'	89
	9'	143
	10'	208
	11'	203
	12'	121

**General Description of Remedial Action:** This junction box 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, producing a 30 x 30 x 12 ft deep excavation. Chloride field tests performed on soil samples did decrease with depth. Organic vapors were measured using a PID which yielded elevated concentrations. The excavated soil was blended on site and representative composite samples of the excavation bottom and the excavation walls were sent to a commercial laboratory for analysis of chloride and TPH. A total of 684 yards of blended backfill was transported to a NMOCD approved disposal facility. On 7/17/2012, a 20-mil reinforced plastic liner was installed at 12 ft. BGS. The remaining excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area. On 8/22/2012, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

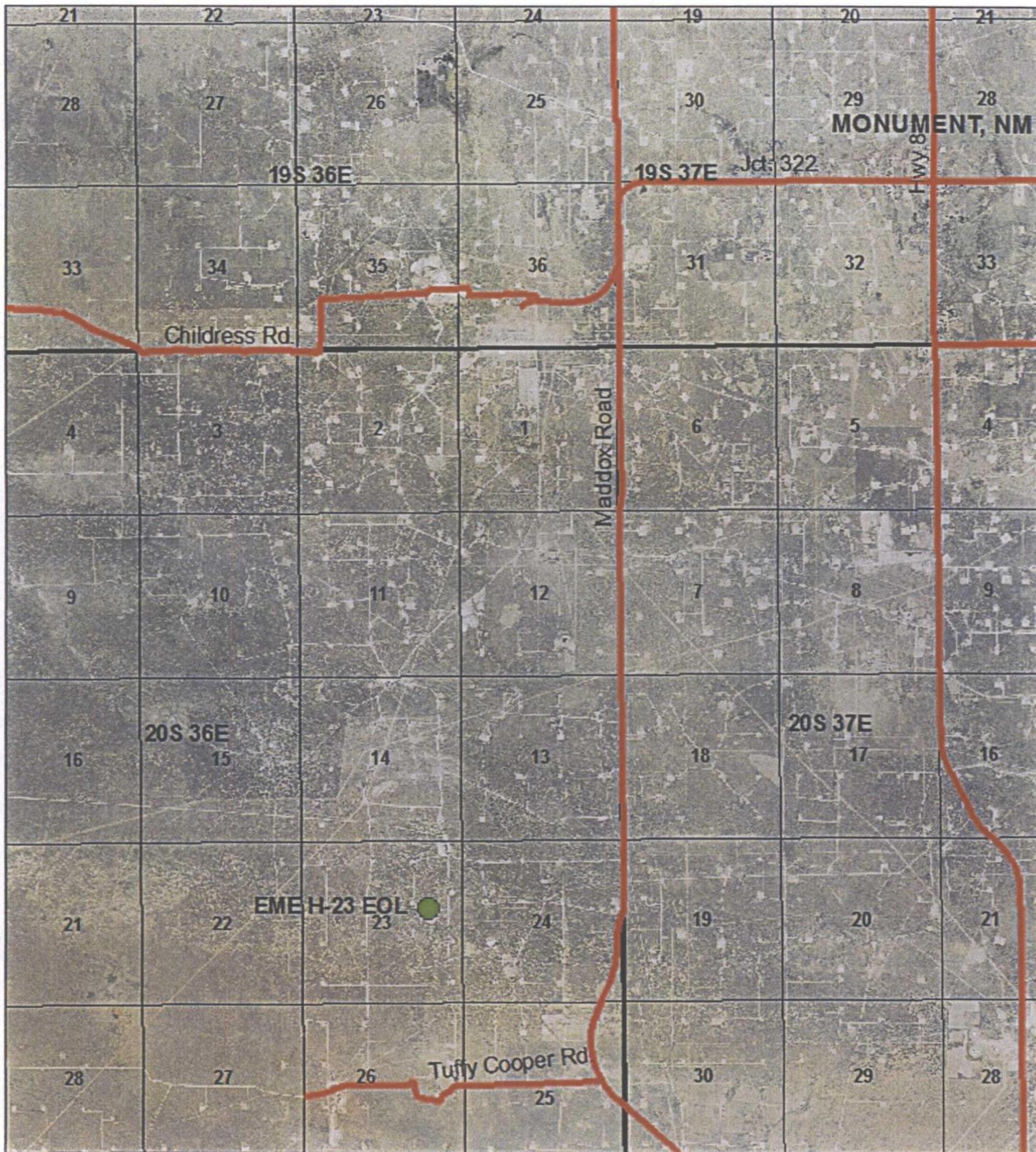
Enclosures: site location map, photos, laboratory analysis, PID (field) screenings, cross-section diagram, chloride graph, revegetation form

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

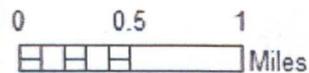
SITE SUPERVISOR Dustin Yarbrough SIGNATURE Not Available COMPANY Rice Environmental Consulting & Safety

PROJECT LEADER Zach Conder SIGNATURE *Zach Conder* DATE 3-4-13



# EME H-23 EOL

UL/H SECTION 23  
T-20-S R-36-E  
LEA COUNTY, NM



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

# EME H-23 EOL

UL/H Sec. 23 (T20S-R36E)



Excavating site

7/2/2012



Collecting sample

7/16/2012



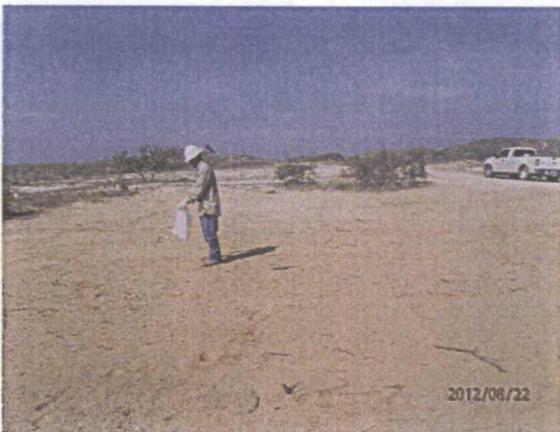
Installing 30'x30'x12' liner @ 12' bgs

7/17/2012



Backfilling site

7/20/2012



Seeding site

8/22/2012



Site completed

8/22/2012



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

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July 19, 2012

ZACH CONDER

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: EME H-23 EOL

Enclosed are the results of analyses for samples received by the laboratory on 07/16/12 16:20.

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,

A handwritten signature in cursive script that reads "Celey D. Keene".

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:	07/16/2012	Sampling Date:	07/16/2012
Reported:	07/19/2012	Sampling Type:	Soil
Project Name:	EME H-23 EOL	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: 5 PT. BOTTOM COMP. (H201625-01)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>144</b>	16.0	07/18/2012	ND	400	100	400	3.92	
TPH 8015M		mg/kg		Analyzed By: AM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<50.0	50.0	07/18/2012	ND	166	83.1	200	7.23	
<b>DRO &gt;C10-C28</b>	<b>793</b>	50.0	07/18/2012	ND	171	85.7	200	6.06	

Surrogate: 1-Chlorooctane 69.5 % 65.2-140

Surrogate: 1-Chlorooctadecane 115 % 63.6-154

**Sample ID: 4 WALL COMP. (H201625-02)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>608</b>	16.0	07/18/2012	ND	400	100	400	3.92	
TPH 8015M		mg/kg		Analyzed By: AM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<b>69.8</b>	50.0	07/18/2012	ND	166	83.1	200	7.23	
<b>DRO &gt;C10-C28</b>	<b>469</b>	50.0	07/18/2012	ND	171	85.7	200	6.06	

Surrogate: 1-Chlorooctane 76.5 % 65.2-140

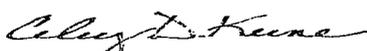
Surrogate: 1-Chlorooctadecane 115 % 63.6-154

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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

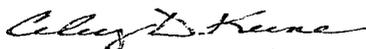
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**Cardinal Laboratories**

\* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



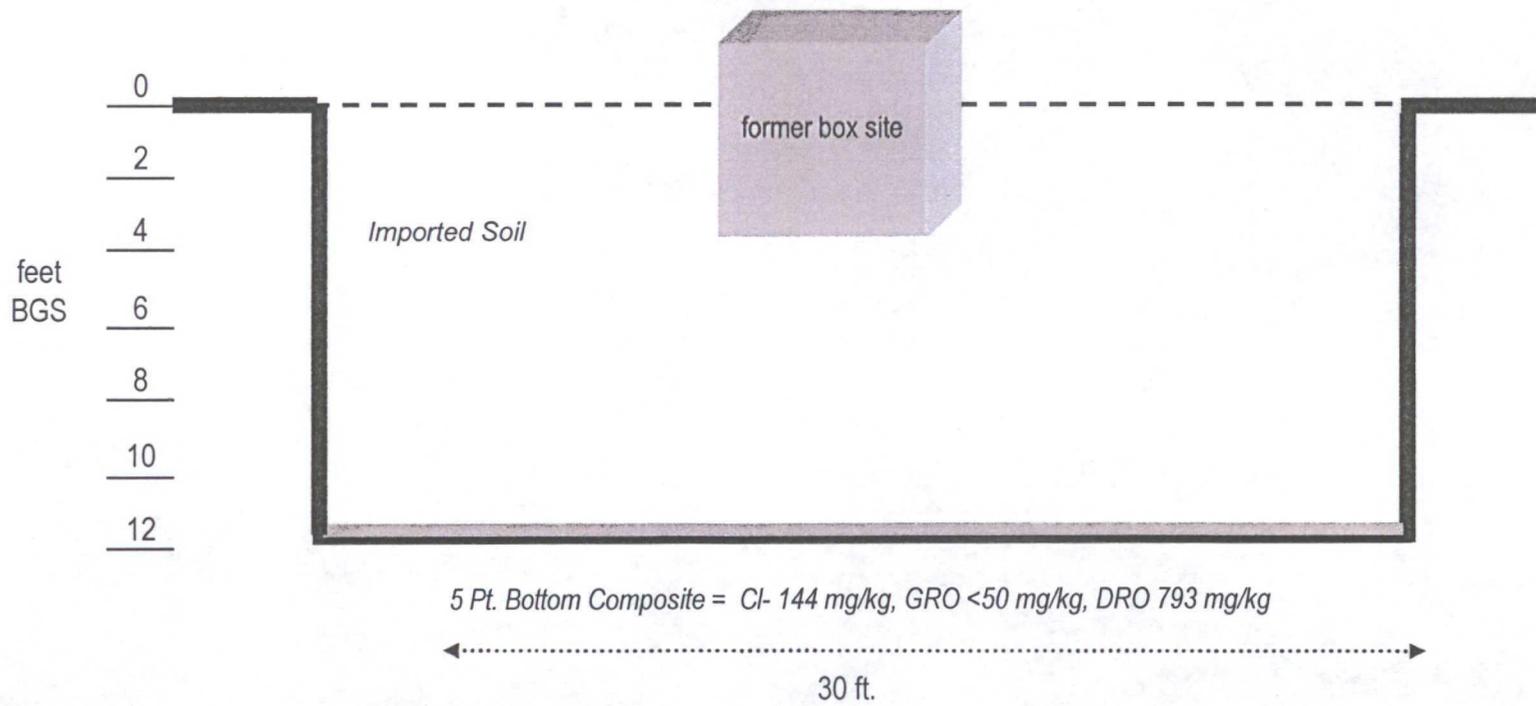
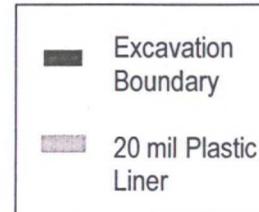


EME H-23 EOL  
Unit 'H', Sec. 23, T20S, R36E

### Excavation Cross-Section

N

S



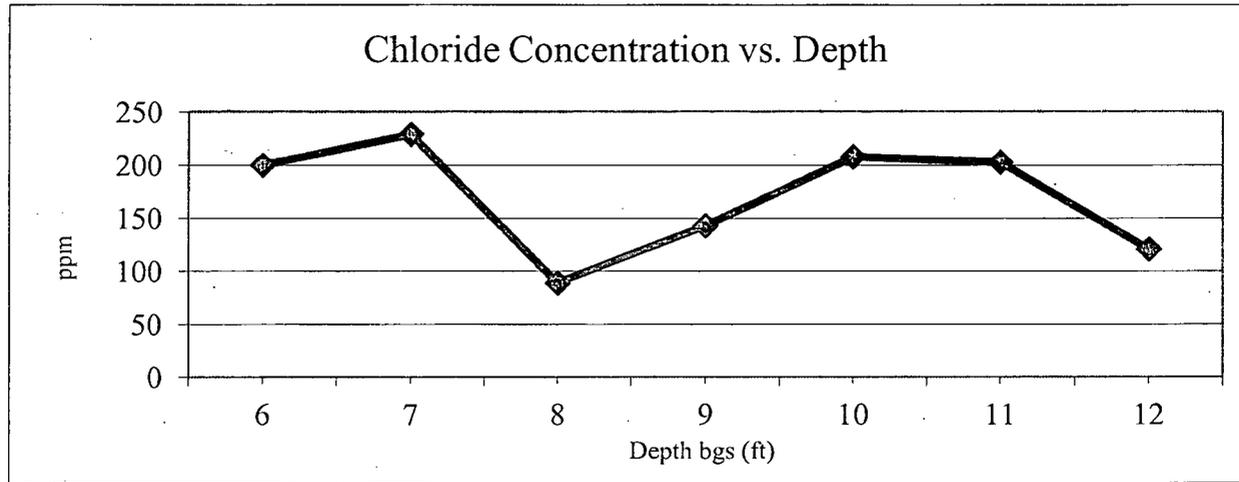
# EME H-23 EOL

Unit 'H', Sec. 23, T20S, R36E

*Backhoe samples at junction (source)*

Depth, bgs (ft)	[Cl <sup>-</sup> ] ppm
6	200
7	229
8	89
9	143
10	208
11	203
12	121

Groundwater = 106 ft





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

## REVEGETATION FORM

### 1. General Information

Site name <b>EME H-23 EOL</b>						
U/L	Section	Township	Range	County	Latitude	Longitude
H	23	20S	36E	Lea	32°33'31.9" N	103°19'10.0" W
Contact Name: <b>Zach Conder</b>						
Email: <b>zconder@rice-ecs.com</b>						
Site size: <b>80'x100'</b>		<b>8,000</b> square feet		Map detail of site attached <input 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: <b>Sandy</b>		Describe soil & subsoil: <b>Sandy soils</b>		
Soil prep methods: Rip <input type="checkbox"/>	Depth(in):	Disc <input type="checkbox"/>	Depth (in):	Rollerpack <input type="checkbox"/>
Date completed: <b>7/20/2012</b>				

### 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: <b>10 lb. Blue Grama and 10 lb. Side Oats Grama</b>	Seeding date: <b>8/22/2012</b>
Broadcast <input checked="" type="checkbox"/>			
Method: <b>Hand Broadcast</b>			
Soil conditions during seeding: Dry <input checked="" type="checkbox"/> Damp <input type="checkbox"/> Wet <input type="checkbox"/>			
Photos attached <input type="checkbox"/>	Observations: <b>Seed was raked into soil.</b>		
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: <b>Eduardo Garcia</b>	Title: <b>Environmental Tech</b>	Date: <b>8/22/2012</b>
Signature: <i>Eduardo Garcia</i>		

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