1R - 427-394

# REPORTS

# DATE:

3-15-13

IR427-394

# EME I-17 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 I-17 EOL: UL/I, Sec. 17, 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 I-17 EOL. The site is located in UL/I, Sec. 17, T19S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 53 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 3x7x7-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 7-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 2/18/2013, 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) | I-17 EOL . | I | 17 | 19S | 37E | Lea | Eliminated | | |

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

Depth to Groundwater 53 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 4/5/2012 Date Completed 4/10/2012 OCD Witness No

Soil Excavated 5.4 cubic yards Excavation Length 3 Width 7 Depth 7 feet

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

## FINAL ANALYTICAL RESULTS: **Sample Date** 4/10/2012 **Sample Depth** 7'

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 7' GRAB | 1.3 | <10.0 | <10.0 | <16 |

| CHLORIDE FIELD TESTS | | |
|---|---|---|
| LOCATION | DEPTH | mg/kg |
| background | 6" | 146 |
| vertical delineation trench at the junction (source) | 2' | 114 |
| | 3' | 148 |
| | 4' | 142 |
| | 5' | 180 |
| | 6' | 122 |
| | 7' | 120 |

**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 3x7x7 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, 7 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 2/18/2013, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

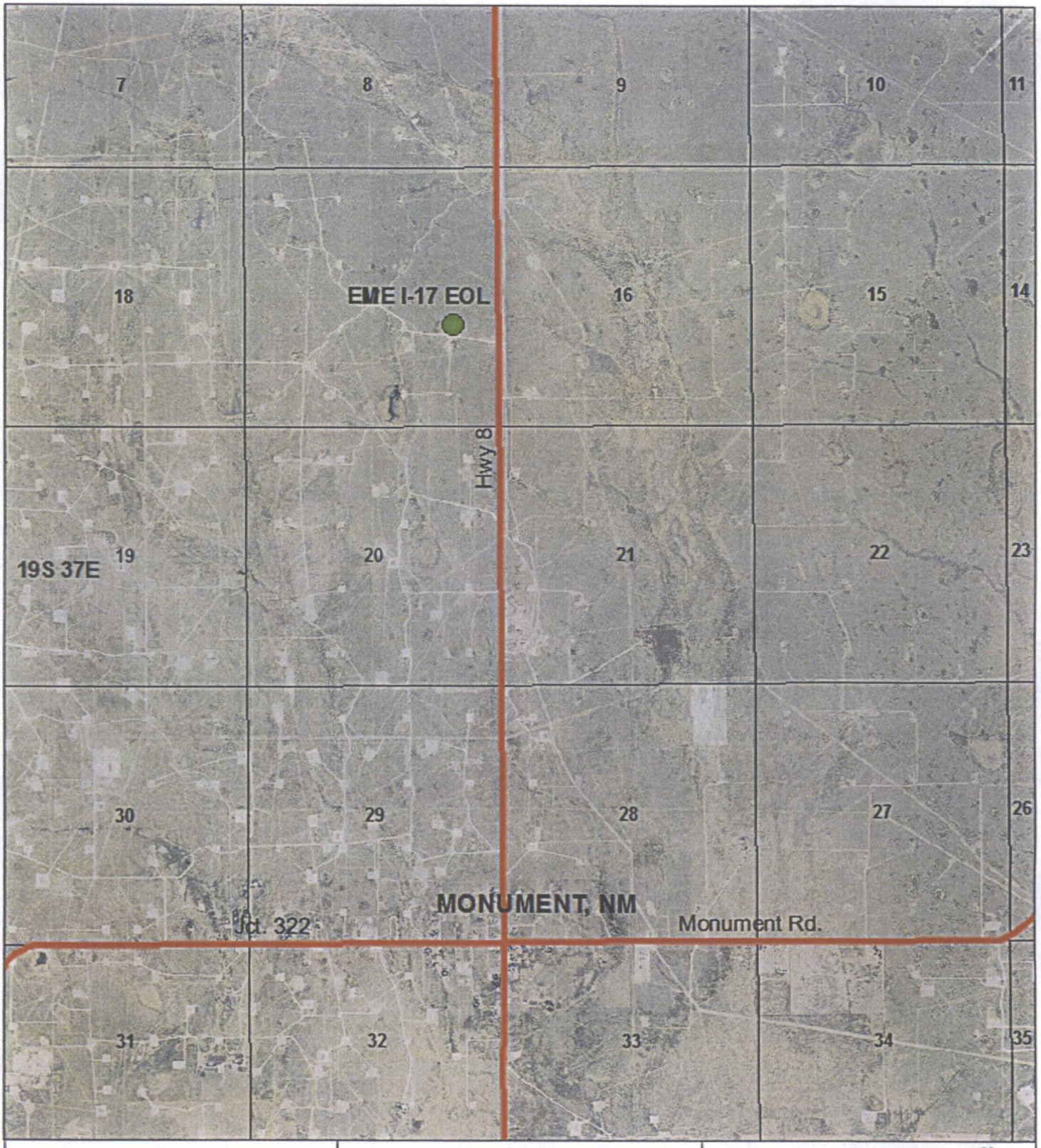
enclosures: photos, lab results, PID (field) screenings, chloride graph, revegetation form

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 _____ DATE 3-15-13




RICE ENVIRONMENTAL RECS CONSULTING & SAFETY, LLC

# EME I-17 EOL

UL/I SECTION 17
T-19-S R-37-E
LEA COUNTY, NM

N
W E
S

0 0.5 1 Miles

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

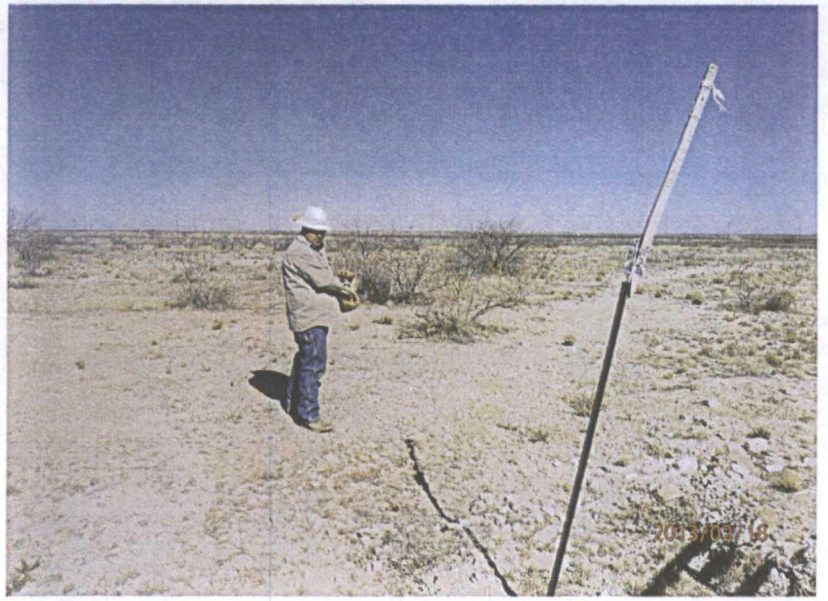
# EME I-17 EOL

Unit I, Section 17, T19S, R37E

Site prior, facing north 4/5/2012


Excavating site, facing northeast 4/5/2012

Collecting a sample, facing east 4/10/2012



Seeding site 2/18/2013

CARDINAL Laboratories

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

April 16, 2012

ZACH CONDER

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: EME I-17 EOL (19/37)

Enclosed are the results of analyses for samples received by the laboratory on 04/11/12 8:00.

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

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: | 04/11/2012 | Sampling Date: | 04/10/2012 |
| Reported: | 04/16/2012 | Sampling Type: | Soil |
| Project Name: | EME I-17 EOL (19/37) | Sampling Condition: | Cool & Intact |
| Project Number: | NONE GIVEN | Sample Received By: | Hope S. Moreno |
| Project Location: | NOT GIVEN | | |

**Sample ID: SOURCE @ 7' (H200821-01)**

**Chloride, SM4500Cl-B** mg/kg **Analyzed By: AP**

| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
|---|---|---|---|---|---|---|---|---|---|
| Chloride | <16.0 | 16.0 | 04/13/2012 | 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 | 04/14/2012 | ND | 191 | 95.6 | 200 | 6.82 | |
| DRO >C10-C28 | <10.0 | 10.0 | 04/14/2012 | ND | 208 | 104 | 200 | 3.99 | |

| | | |
|---|---|---|
| *Surrogate: 1-Chlorooctane* | *104 %* | *55.5-154* |
| *Surrogate: 1-Chlorooctadecane* | *110 %* | *57.6-158* |



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

| | |
|---|---|
| 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 I-17 EOL 19.37 | Phone #: |
| Sampler Name: Dustin W. Yarbrough | 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 | | | | | | |
| H30821-1 | Source @ 7' | G | 1 | | | ✓ | | | | | ✓ | | 4-10-12 | 10:30 | ✓ | ✓ | | | | | | | | | | |

COPY

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: | Date: 4-11-12 | Received By: | Phone Result: ☐ Yes ☑ No Add'l Phone #: |
| | Time: 8:00a | | 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 |
| | 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

# 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 | I-17 EOL | I | 17 | 19S | 37E |

| SAMPLE ID | PID | SAMPLE ID | PID |
|---|---|---|---|
| Source @ 4' | 4.3 | | |
| 5' | 2.8 | | |
| 6' | 2.5 | | |
| 7' | 1.3 | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |



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

SIGNATURE: Austyn W. Yarbrough DATE: 4/10/2012

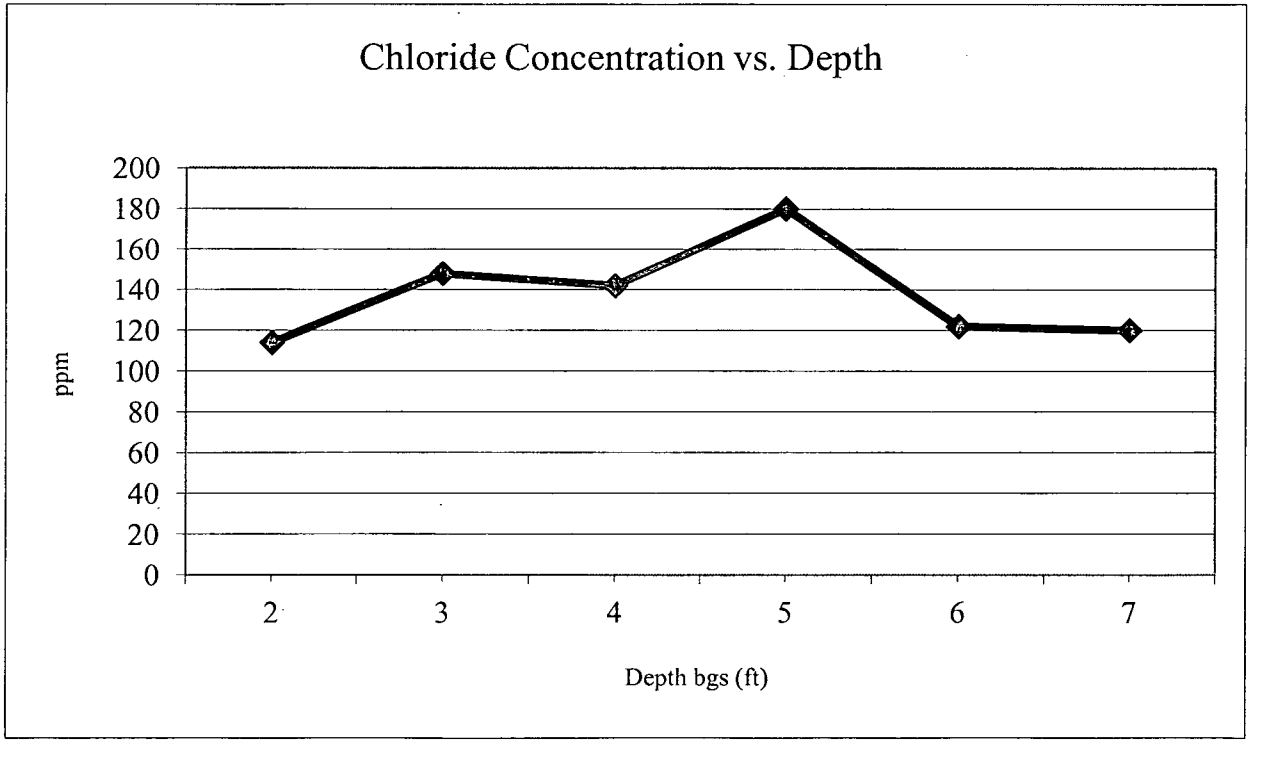
# EME I-17 EOL

Unit 'I', Sec. 17, T19S, R37E

*Backhoe samples at junction (source)*

| Depth bgs (ft) | [Cl⁻] ppm |
|---|---|
| 2 | 114 |
| 3 | 148 |
| 4 | 142 |
| 5 | 180 |
| 6 | 122 |
| 7 | 120 |

Groundwater = 53 ft



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

# REVEGETATION FORM

**1. General Information**

| Site name: | EME I-17 EOL | | | | | |
|---|---|---|---|---|---|---|
| U/L | Section | Township | Range | County | Latitude | Longitude |
| I | 17 | 19S | 37E | Lea | N32*39'29.5" | W103*60'05.9" |
| Contact Name: | Hack Conder | | | | | |
| Email: | hconder@rice-ecs.com | | | | | |
| Site size: | 100 | 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 with some caliche | | |
| Soil prep methods: | Rip ☐ Depth(in): | Disc ☐ Depth (in): | Rollerpack ☐ | |
| Date completed: 4/10/2012 | | | | |

**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: 1 lbs. Lea County/1 lbs. Winter Wheat/1 lbs. Blue Grama | Seeding date: 2/18/2013 |
|---|---|---|---|
| Broadcast ☒ Method: Hand Broadcast | | | |
| Soil conditions during seeding: Dry ☒ Damp ☐ Wet ☐ | | | |
| Photos attached ☐ Number of photos: | Observations: The seed was raked into soil. | | |

**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: Kyle Norman | Title: Environmental Tech | Date: 2/18/2013 |
|---|---|---|
| Signature: Kyle Norman | | |