1R-427-371

REPORTS

4-9-12



.

EME E-30 EOL 2011

CLOSURE

RICE Operating Company

122 West Taylor • Hobbs, New Mexico 88240 Phone: (575) 393-9174 • Fax: (575) 397-1471

May 1, 2012

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 E-30 EOL: UL/E, Sec. 30, 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 2011, ROC initiated work on the former E-30 EOL junction box. The site is located in UL/E, Sec. 30, T19S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately $25 \pm -$ feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 6x2x8-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 8-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. The remaining excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area. On 1/24/2011, 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, laboratory analysis, photo documentation, PID sheet, and chloride graph 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

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Hack Conder Environmental Manager

enclosures

RICE OPERATING COMPANY JUNCTION BOX FINAL REPORT

				BOX LOCA	TION								
SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET						
Eunice Monument	E-30 EOL E 30 19S 37E Lea		Lea	Length	Width	Dept	'n						
Eumont (EME)	E-30 EOL	E.	50	193	572	Lea		Eliminated	Eliminated				
LAND TYPE: E	BLM	STATE X	FEE LA	NDOWNER									
Depth to Grour	Depth to Groundwater 25 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20												
Date Started	1/24/	/2011	Date Cor	mpleted	1/24/2011		Witness	N	0				
Soil Excavated	3.6	cubic yai	rds Exc	avation Le	ngth 6	Width	2	Depth	8	feet			
Soil Disposed	None	cubic yai	rds Off	site Facility	n	/a	Location	. <u></u>	n/a				
NAL ANALYTI	CAL RE	SULTS:	Sample	e Date	1/24/201	1	Sample De	oth	8'				

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

Sample	PID (field)	GRO	DRO	Chloride
Location	ppm	mg/kg	mg/kg	mg/kg
SOURCE 8' GRAB	0.7	<10.0	<10.0	<16

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 6X2X8-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, 8 ft. 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. The remaining excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area. On 1/24/2011, 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

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

SITE SUPERVISOR	John Harrison	_ SIGNATURE _	signature not available		
REPORT ASSEMBLED BY	Laura Peña		Laura Peña		RICE OPERATING COMPANY
PROJECT LEADER	Larry Bruce Baker, Jr.	_ SIGNATURE _	Lany Bruce Baker pr.	DATE	4-9-12

CHLORIDE FIELD TESTS									
LOCATION	DEPTH	mg/kg							
background	6"	111							
vertical	4'	56							
delineation	5'	117							
trench at the	6'	120							
junction	7'	118							
(source)	8'	116							

EME E-30 EOL Unit E, Section 30, T19S, R37E



Sampling delineation trench, facing northwest

1/24/2011



Seeding location, facing west

1/24/2011



Backfilling with clean imported soil, facing north

1/24/2011



Site Complete, facing northwest

1/24/2011

CARDINAL Laboratories

January 27, 2011

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

RE: EME E-30 EOL (19/37)

Enclosed are the results of analyses for samples received by the laboratory on 01/24/11 16:10.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method SW-846 8260	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method TX 1005	Total Petroleum Hydorcarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

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 (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. Keine

Celey D. Keene Lab Director/Quality Manager

COBN

CARDINAL Laboratories

Analytical Results For:

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

Received:	01/24/2011	Sampling Date:	01/24/2011
Reported:	01/27/2011	Sampling Type:	Soil
Project Name:	EME E-30 EOL (19/37)	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: SOURCE @ 8' (H100166-01)

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Chloride, SM4500Cl-B	ide, SM4500Cl-Bmg/kg								
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	· % Recovery	True Value QC	RPD	Qualifier
Chioride	<16.0	16.0	01/26/2011	ND	432	108	400	7.14	
ТРН 8015М	mg/kg		Analyzed By: AB						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	01/26/2011	ND	229	91.6	250	4.27	
DRO >C10-C28	<10.0	10.0	01/26/2011	ND	210	84.2	250	3.64	
Surrogate: 1-Chlorooctane	101	% 70-130							
Surrogate: 1-Chlorooctadecane	109	% 70-130							

COPN

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 whatsever 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 bable for incidental or consequential damages, including, without limitation, busines 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 claims based upon any of the above stated restores or or diverses.

Celev D. Kune

Celey D. Keene, Lab Director/Quality Manager

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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

COPN

Cardinal Laboratories

*=Accredited Analyte

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Celey D.1 Kune

Celey D. Keene, Lab Director/Quality Manager

Page 3 of 4



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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RICE OPERATING COMPANY

122 West Tayor Hobbs, NM 88240 PHONE: (575) 393-9174 FAX: (575) 397-1471 PID METER CALIBRATION & FIELD REPORT FORM

Check Model Number:

	Model: PGM 7300	Serial No: 590-000183] Model: PGM 7600	Serial No: 110-023920
Х	Model: PGM 7300	Serial No: 590-000508	Model: PGM 7600	Serial No: 110-013744
	Model: PGM 7300	Serial No: 590-000504	Model: PGM 7600	Serial No: 110-013676

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO : 930737	EXPIRATION DATE: 6-16-2013
FILL DATE:	METER READING ACCURACY: 100PPM

ACCURACY : +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	E-30 EOL	E	30	198	37E

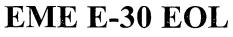
SAMPLE ID	PID	SAMPLE ID	PID
SOURCE @ 4'	3.4		
SOURCE @ 5'	2		
SOURCE @ 6'	0.9		
SOURCE @ 7'	0.8		
SOURCE @ 8'	0.7		
BACKGROUND	2.2		
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I verify that I have calibrated the above instrument in accordance to the manufacture operation manual.

SIGNATUE: John R. Harrison

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DATE: 1/24/2011



Unit 'E', Sec. 30, T19S, R37E

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Backhoe samples at junction (source)

