

1R - 427-381

REPORTS

DATE:

4-10-12

1R427-381

RECEIVED CDD

2012 MAY -1 P 1:51

EME Jct. J-25-2

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 Jct. J-25-2: UL/J, Sec. 25, T19S, 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 2011, ROC initiated work on the former J-25-2 junction box. The site is located in UL/J, Sec. 25, T19S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 25 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 10x25x12 ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in low concentrations of TPH and elevated concentrations of chloride. The excavated soil was blended on site and representative composite samples of the excavation bottom, the excavation walls, and the blended backfill were sent to a commercial for analysis of chloride and TPH, resulting in a 4-WALL chloride concentration of 64 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The bottom composite resulted in chloride concentrations of 160 mg/kg, and concentrations of GRO and DRO below detectable limits. The blended backfill resulted in a chloride concentration of 80 mg/kg, and concentrations of GRO and DRO below detectable limits. The excavation was backfilled with the blended soil to 1 ft BGS. The excavation was backfilled from 1 ft BGS to ground surface with imported sand and contoured to the surrounding area. On 5/13/2011, 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, 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', with a stylized, flowing script.

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		
Eunice Monument Eumont (EME)	Jct. J-25-2	J	25	19S	36 E	Lea	Length	Width	Depth
							Eliminated		

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

Depth to Groundwater 25 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 3/25/2011 Date Completed 5/13/2011 OCD Witness No

Soil Excavated 111.1 cubic yards Excavation Length 10 Width 25 Depth 12 feet

Soil Disposed 36 cubic yards Offsite Facility C & C Landfarm Location Monument, NM

FINAL ANALYTICAL RESULTS: Sample Date 4/25/2011, 4/26/2011 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.	3.3	<10.0	<10.0	64
BOTTOM COMP.	1.0	<10.0	<10.0	160
BLENDED BACKFILL	2.8	<10.0	<10.0	80

CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
background	6"	149
4-WALL Comp	n/a	150
Bottom Comp	12'	278
Blended Backfill	n/a	194
Vertical delineation trench 5' north of source	2'	175
	4'	146
	6'	91
	8'	87
	10'	207
	12'	139

General Description of Remedial Action: This junction box 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 producing a 10x25x12 ft deep excavation. Chloride field tests were performed on soil samples which yielded low chloride. Organic vapors were measured using a PID which yielded low concentrations. The excavated soil was blended on site and representative composite samples were collected from the excavation walls, the excavation bottom, and the blended backfill. The samples were sent to a commercial laboratory for analysis of chloride and TPH, which confirmed low concentrations of each. A total of 36 yards of excavated soil was hauled to a NMOCD approved facility for disposal. The excavation was backfilled with the blended soil to 1 ft. BGS. The excavation was backfilled from 1 ft to ground surface with imported sand and contoured to the surrounding area. On 5/13/2011, 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, revegetation form

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

SITE SUPERVISOR Robert Egans SIGNATURE signature not available

REPORT ASSEMBLED BY Laura Peña SIGNATURE Laura Peña COMPANY RICE OPERATING COMPANY

PROJECT LEADER Zach Conder SIGNATURE Zach Conder DATE 4-10-12

EME Jct. J-25-2

Unit J, Section 25, T19S, R36E



Collecting sample, facing west

4.25.11



Final excavation, facing west

4.26.11



Spreading seed, facing north

5.13.11



Site complete, facing north

5.13.11



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

May 03, 2011

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

RE: EME JCT J-25-2 (19/36)

Enclosed are the results of analyses for samples received by the laboratory on 04/27/11 8:05.

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 Hydrocarbons

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

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 (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
Lab Director/Quality Manager

COPY

Analytical Results For:

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

 Received: 04/27/2011
 Reported: 05/03/2011
 Project Name: EME JCT J-25-2 (19/36)
 Project Number: NONE GIVEN
 Project Location: EME JCT J-25-2 (19/36)

 Sampling Date: 04/25/2011
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: 5 PT BTM COMP (H100870-01)

Chloride, SM4500Cl-B		mg/kg	Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	160	16.0	05/02/2011	ND	416	104	400	3.77	
TPH 8015M		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	05/03/2011	ND	183	91.7	200	6.63	
DRO >C10-C28	<10.0	10.0	05/03/2011	ND	190	95.2	200	9.96	
Surrogate: 1-Chlorooctane	92.6 %	70-130							
Surrogate: 1-Chlorooctadecane	103 %	70-130							

Sample ID: 4 WALL COMP (H100870-02)

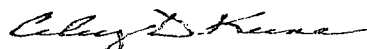
Chloride, SM4500Cl-B		mg/kg	Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	05/02/2011	ND	416	104	400	3.77	
TPH 8015M		mg/kg	Analyzed By: AB						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	05/03/2011	ND	183	91.7	200	6.63	
DRO >C10-C28	<10.0	10.0	05/03/2011	ND	190	95.2	200	9.96	
Surrogate: 1-Chlorooctane	88.1 %	70-130							
Surrogate: 1-Chlorooctadecane	95.1 %	70-130							

Cardinal Laboratories

* = Accredited Analyte

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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: 04/27/2011
 Reported: 05/03/2011
 Project Name: EME JCT J-25-2 (19/36)
 Project Number: NONE GIVEN
 Project Location: EME JCT J-25-2 (19/36)

 Sampling Date: 04/26/2011
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

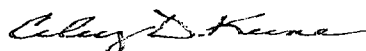
Sample ID: BLENDED BACKFILL (H100870-03)

Chloride, SM4500CI-B		mg/kg	Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	05/02/2011	ND	416	104	400	3.77	
TPH 8015M		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	05/03/2011	ND	183	91.7	200	6.63	
DRO >C10-C28	<10.0	10.0	05/03/2011	ND	190	95.2	200	9.96	
Surrogate: 1-Chlorooctane	91.7 %	70-130							
Surrogate: 1-Chlorooctadecane	104 %	70-130							

Cardinal Laboratories

* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

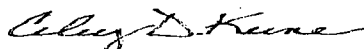
Notes and Definitions

- 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

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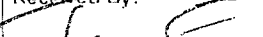

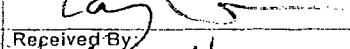



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240
(505) 393-2326 FAX (505) 393-2476

[illegible]

PLEASE NOTE: Liability for 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 for damages 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 time, or loss of profits incurred by client. Its subsidiaries, affiliates or successors shall not be held out or retained 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: 4/27/11	Received By: 	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
Time: 7:30				Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Relinquished By: 		Date: 4/27/11	Received By: 	REMARKS:	
Time: 8:05					
Delivered By: (Circle One)		Sample Condition		CHECKED BY:	
Sampler - UPS - Bus - Other: -		Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/>		(Initials)	
		<input type="checkbox"/> Yes <input type="checkbox"/> No			

† 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.	<input checked="checked" type="checkbox"/>	MODEL: PGM 7300	SERIAL NO: 590-000508
MODEL	<input type="checkbox"/>	MODEL: PGM 7300	SERIAL NO: 590-000504
NO.	<input type="checkbox"/>	MODEL: PGM 7320	SERIAL NO: 592-903318
	<input type="checkbox"/>	MODEL: PGM 7300	SERIAL NO: 590-000183

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

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

ACCURACY : +/- 2%

COMPANY

SITE	UNIT	SECTION	TOWN SHIP	RANGE
ICT I-25-2	I	25	195	36E

SAMPLE ID	PID	SAMPLE ID	PID
5pt Bottom Comp	1.0		

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

SIGNATURE:

Robert [Signature]



DATE: 4-25-2011

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.	<input checked="" type="checkbox"/>	MODEL: PGM 7300	SERIAL NO: 590-000508
MODEL	<input type="checkbox"/>	MODEL: PGM 7300	SERIAL NO: 590-000504
NO.	<input type="checkbox"/>	MODEL: PGM 7320	SERIAL NO: 592-903318
	<input type="checkbox"/>	MODEL: PGM 7300	SERIAL NO: 590-000183

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

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

ACCURACY: +/- 2%

COMPANY

SITE	UNIT	SECTION	TOWN SHIP	RANGE
JCT J-25-2	J	25	19S	36E

SAMPLE ID	PID	SAMPLE ID	PID
4 Wall Composite	3.3		
Blended Back Fill	2.8		

COPY

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

SIGNATURE:

Robert Jones

DATE:

4-26-2011

CHLORIDE CONCENTRATION CURVE

RICE *Operating Company*

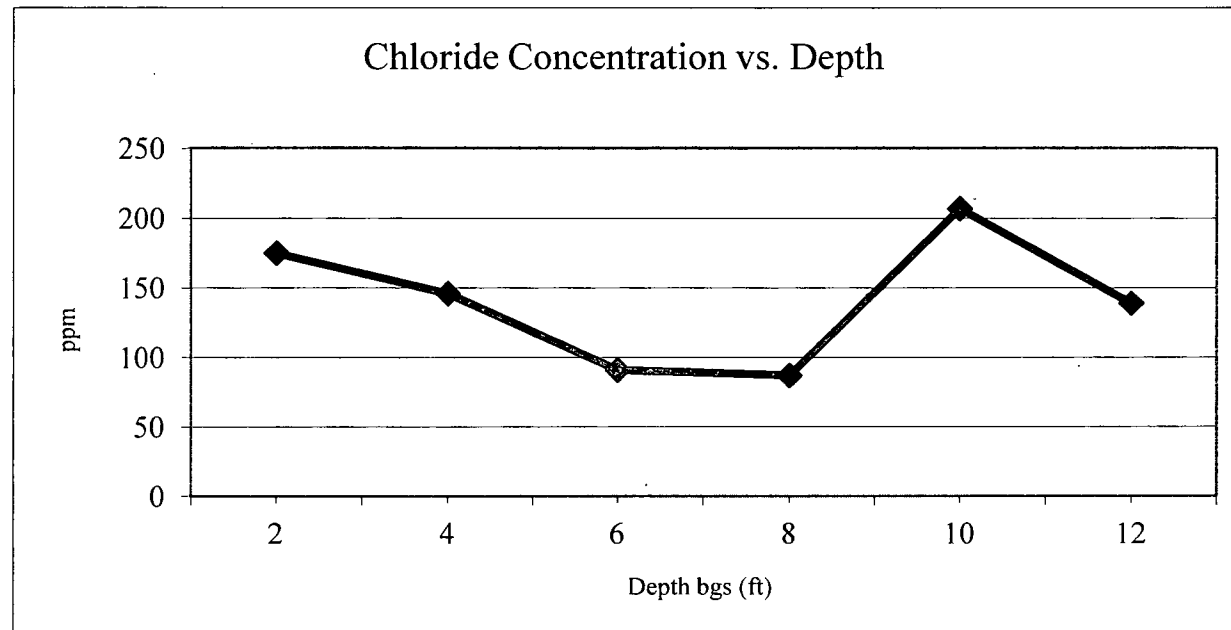
EME Jct. J-25-2

Unit 'J', Sec. 25, T19S, R36E

Backhoe samples 5' north of source

Depth bgs (ft)	[Cl ⁻] ppm
2	175
4	146
6	91
8	87
10	207
12	139

Groundwater = 25 ft





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

REVEGETATION FORM

1. General Information

Site name: EME J-25-2						
U/L J	Section 25	Township T19S	Range R36E	County LEA	Latitude 32° 37,471'	Longitude 103° 18, 136'
Contact Name: Bruce Baker						
Email: bbaker@rice-ecs.com						
Site size: 104X50		5200 square feet		Map detail of site attached <input checked="" 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 type="checkbox"/>	Bioremediated <input type="checkbox"/>	Imported <input checked="" 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):	Rollerpack <input type="checkbox"/>
Date completed: 5-13-2011					

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: 2 ½ lbs. of blue grama & 2 ½ lbs. of side oats grama
Seeding date: 5-13-2011		
Broadcast <input checked="" type="checkbox"/>		
Method: Manuel hand spreader		
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: 6		

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: ROBERT EGANS	Title: Environmental Tech	Date: 5-13-2011
Signature: <i>Robert Egans</i>		

COPY