

1R - 427-384

REPORTS

DATE:

4-10-12

1R427-384

RECEIVED OGD

2012 MAY -1 P 1:52

EME K-19 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 K-19 EOL: UL/K, Sec. 19, 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 K-19 EOL junction box. The site is located in UL/K, Sec. 19, T19S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 40 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x2x6-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 6-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 excavation was backfilled with excavation soil. The remaining excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area. On 2/11/2011, 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 long horizontal flourish extending to the right.

Hack Conder
Environmental Manager

enclosures

BOX LOCATION

PROJECT LEADER Larry Bruce Baker, Jr. SIGNATURE *Larry Bruce Baker Jr.* DATE 4-10-12

EME K-19 EOL

Unit K, Section 19, T19S, R37E



Collecting sample

1/27/2011



Backfilling site

1/27/2011



Seeding site

2/11/2011



Site complete

2/11/2011



January 28, 2011

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

RE: EME K-19 EOL (19/37)

Enclosed are the results of analyses for samples received by the laboratory on 01/27/11 16:18.

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: 01/27/2011
Reported: 01/28/2011
Project Name: EME K-19 EOL (19/37)
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 01/27/2011
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: SOURCE @ 6' (H100194-01)


Chloride, SM4500Cl-B			mg/kg							Analyzed By: HM
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	01/28/2011	ND	432	108	400	0.00		
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	01/28/2011	ND	249	99.6	250	1.08		
DRO >C10-C28	<10.0	10.0	01/28/2011	ND	227	90.8	250	0.143		
<hr/>										
Surrogate: 1-Chlorooctane	96.3 %	70-130								
Surrogate: 1-Chlorooctadecane	102 %	70-130								

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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 whatsoever 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 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 the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



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



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

Company Name: <u>KECE</u>		BILL TO		ANALYSIS REQUEST																							
Project Manager: <u>BOUCE RAKER</u>		P.O. #:																									
Address:		Company:																									
City:		Attn:																									
State:		Address:																									
Zip:		City:																									
Phone #:		State:																									
Fax #:		Zip:																									
Project #:		Phone #:																									
Project Owner:		Fax #:																									
Project Name: <u>EME K-19 EOL 19.37</u>																											
Project Location:																											
Sampler Name: <u>HARRISON</u>																											
FOR LAB USE ONLY	Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX				PRESERV.	SAMPLING		COPY															
					GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER	ACID/BASE													ICE / COOL	OTHER	DATE	TIME
	H100194-1	SOURCE @ 6'	G	1																						11/27/04	11:00

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: <u>[Signature]</u>	Date: <u>12/11</u>	Received By: <u>Jodi Benson</u>	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
	Time: <u>4:18</u>		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Relinquished By:	Date:	Received By:	REMARKS: <u>EMAIL RESULTS</u>	
	Time:		<u>RUSH!</u>	
Delivered By: (Circle One)	Sample Condition	CHECKED BY: (Initials)	<u>631-8909</u>	
Sampler: <u>UPS</u> - Bus - Other:	Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/>	<u>[Signature]</u>		
	Yes <input type="checkbox"/> No <input type="checkbox"/>			

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

RICE OPERATING COMPANY

122 West Taylor 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 7300

Serial No: 590-000508

Model: PGM 7300

Serial No: 590-000504

Model: PGM 7600

Serial No: 110-023920

Model: PGM 7600

Serial No: 110-013744

Model: PGM 7600

Serial No: 110-013676

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: <u>930737</u>	EXPIRATION DATE: <u>6/16/13</u>
METER READING ACCURACY: <u>100.0</u>	

ACCURACY : +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	K-19EOL	K	19	195	37E

SAMPLE ID	PID	SAMPLE ID	PID
SOURCE @ 2'	5.5		
3'	3.4		
4'	2.5		
5'	1.6		
6'	3.1		
BACKGROUND @ 6"	7.2		

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

SIGNATURE:

[Signature]

DATE:

1/27/11

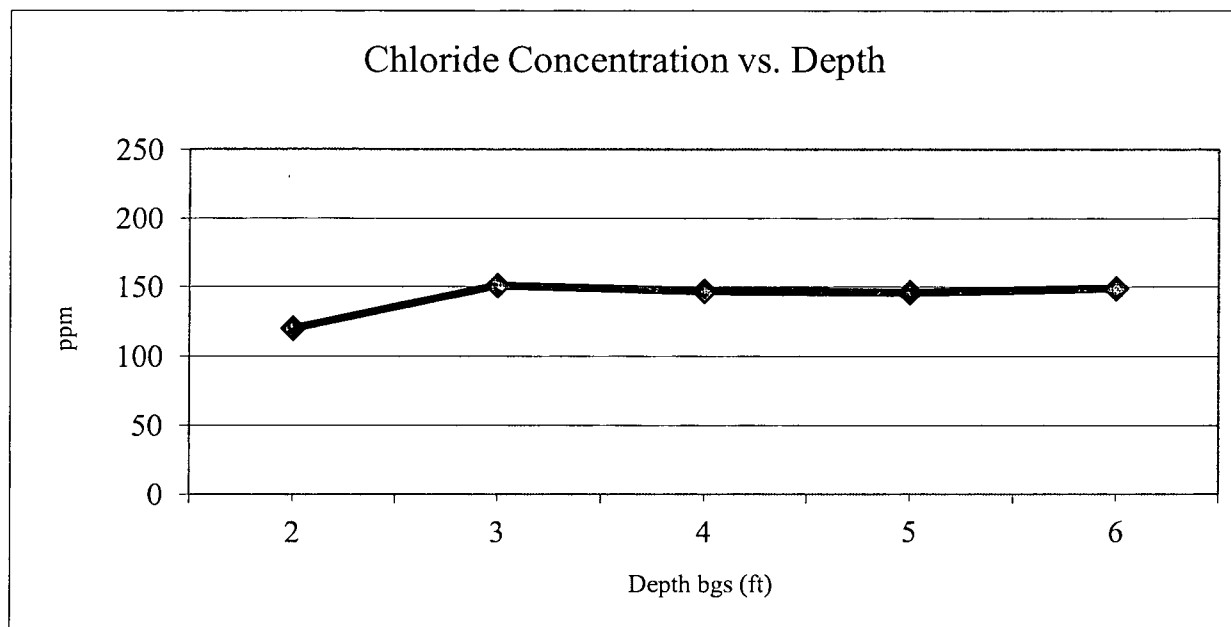
EME K-19 EOL

Unit 'K', Sec. 19, T19S, R37E

Backhoe samples at junction (source)

Depth bgs (ft)	[Cl] ppm
2	120
3	151
4	147
5	146
6	149

Groundwater = 40 ft





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

VEGETATION FORM

1. General Information

Site name: EME K-19 EOL						
U/L K	Section 19	Township 19S	Range 37E	County Lea	Latitude 32.64532'	Longitude 103.29569'
Contact Name: Bruce Baker						
Email: bbaker@rice-ecs.com						
Site size: 6x10		square feet 60		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 checked="" type="checkbox"/>	Bioremediated <input type="checkbox"/>	Imported <input type="checkbox"/>	Blended <input type="checkbox"/>	Depth (in):
Texture: Sandy		Describe soil & subsoil: Blow sand and subsoil caliche		
Soil prep methods: Rip <input type="checkbox"/>	Depth(in):	Disc <input type="checkbox"/>	Depth (in):	Rollerpack <input type="checkbox"/>
Date completed: 2/11/2011				

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: 0.5 lbs. Blue Grama	Seeding date: 2/11/2011
Broadcast <input checked="" type="checkbox"/>			
Method: 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: 2			

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: John Harrison	Title: Environmental Tech.	Date: 2/11/11
Signature: Not available		

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