

1R - 426-308

REPORTS

DATE:

3-22-12

1R426-308

RECEIVED OOD

2012 MAY -1 P 1:50

BD M-29 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
BD M-29 EOL: UL/M, Sec. 29, T22S, R38E
RICE Operating Company – Blinbry-Drinkard SWD System

Mr. Hansen:

Rice Operating Company (ROC) is the service provider (agent) for the BD 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 M-29 EOL junction box. The site is located in UL/M, Sec. 29, T22S, R38E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 124 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 3x7x12-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 12-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 384 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The excavated soil was returned to the site and contoured to the surrounding area. On 9/30/2011, 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 screenings, 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

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Bliebry-Drinkard (BD)	M-29 EOL	M	29	22S	38E	Lea	Length 5'	Width 5'	Depth 4'
							Eliminated		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER D. K. Boyd Oil and Gas Co. OTHER _____

Depth to Groundwater 124 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 6/18/2011 Date Completed 9/30/2011 OCD Witness No

Soil Excavated 9.3 cubic yards Excavation Length 3 Width 7 Depth 12 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 6/27/2011 Sample Depth 12'

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

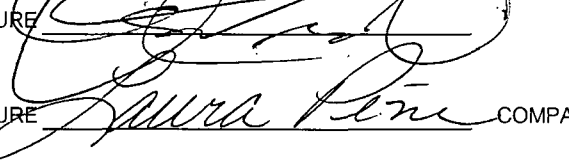
Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
SOURCE 12' GRAB	0.0	<10.0	<10.0	384

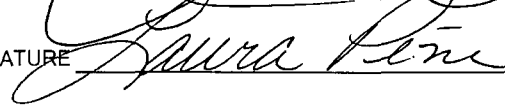
CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
background	6"	145
vertical delineation trench at the junction (source)	3'	239
	4'	310
	5'	336
	6'	307
	7'	348
	8'	212
	9'	386
	10'	353
	11'	340
	12'	225


General Description of Remedial Action: This junction 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 creating a 3X7X12-ft. deep excavation. Chloride field tests performed on each sample yielded low concentrations. Organic vapors were measured using a PID, which yielded low concentrations. The deepest sample, 12 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 to ground surface and contoured to the surrounding area. On 9/30/2011, 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 Oscar Frayre SIGNATURE 

REPORT ASSEMBLED BY Laura Peña SIGNATURE  COMPANY RICE OPERATING COMPANY

PROJECT LEADER Zach Conder SIGNATURE  DATE 3-22-12

BD M-29 EOL

Unit M, Section 29, T22S, R38E



Digging vertical, facing south

6.18.11



Collecting sample, facing northwest

6.27.11



Seeding site, facing northwest

9.30.11



Raking site, facing northeast

9.30.11



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

June 29, 2011

Hack Conder

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: BD M-29 EOL

Enclosed are the results of analyses for samples received by the laboratory on 06/27/11 16:15.

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,

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
 Hack Conder
 112 W. Taylor
 Hobbs NM, 88240
 Fax To: (575) 397-1471

 Received: 06/27/2011
 Reported: 06/29/2011
 Project Name: BD M-29 EOL
 Project Number: BD M-29 EOL 22/38
 Project Location: NOT GIVEN

 Sampling Date: 06/27/2011
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Jodi Henson

Sample ID: SOURCE @ 12' (H101332-01)

Chloride, SM4500CI-B			mg/kg		Analyzed By: NM				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	394	16.0	06/28/2011	ND	432	108	400	3.64	
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	06/29/2011	ND	152	76.2	200	0.938	
DRO >C10-C28	<10.0	10.0	06/29/2011	ND	150	75.1	200	2.22	

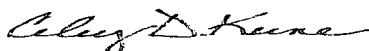
 Surrogate: 1-Chlorooctane 134 % 70-130
 Surrogate: 1-Chlorooctadecane 135 % 70-130

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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

- Z-01 One or more surrogates above historical limits.
- 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 SM4500CH-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

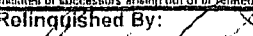



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

[illegible]

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Relinquished By: 		Date: <u>8-27-11</u> Time: <u>4:15</u>	Received By: <u>Jodi Benson</u>	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #: _____ Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Fax #: _____	REMARKS: H - <u>Condo @ Price - 005</u> <u>100</u> , K - <u>Trust @ Price - 005</u> <u>100</u> , L - <u>Washburn @ Price - 005</u> <u>100</u> , B - <u>Patton @ Price - 005</u> <u>100</u> , O - <u>Payne @ Price - 005</u> <u>100</u> .
Relinquished By: 		Date: _____ Time: _____	Received By: _____		
Delivered By: (Circle One) Sampler - UPS - Bus - Other: _____		Sample Condition Cool <input type="checkbox"/> Intact <input type="checkbox"/> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No	CHECKED BY: <u>4</u> (Initials)	sample taken & brought to lab	

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

immediately.

122 West Taylor Hobbs, NM 88240
PHONE: (505) 393-9174 FAX: (505) 397-1471
PID METER CALIBRATION & FIELD REPORT FORM

MODEL: PGM 7300	SERIAL NO: 590-000508
MODEL: PGM 7300	SERIAL NO: 590-000504
MODEL: PGM 7320	SERIAL NO: 592-903318
MODEL: PGM 7600	SERIAL NO: 590-000183

LOT NO :930132	EXPIRATION DATE:4-28-13
METER READING ACCURACY:100	

COMPANY
RICE

[illegible]

DATE:

6-27/2011

CHLORIDE CONCENTRATION CURVE

RICE Operating Company

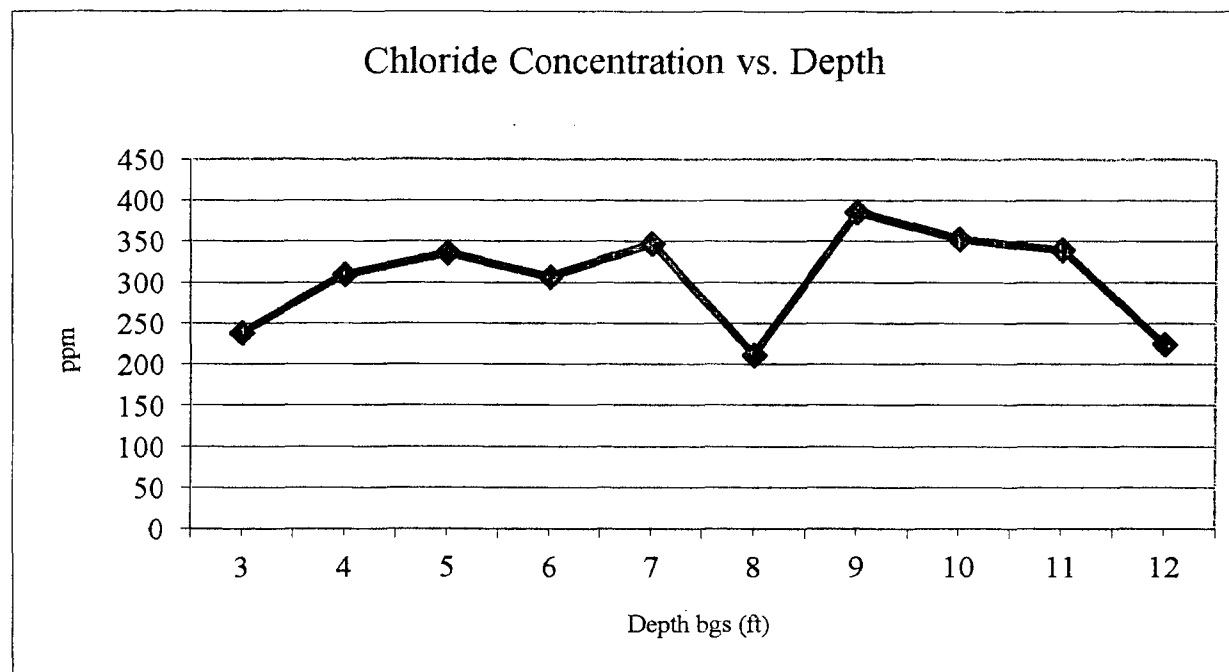
BD M-29 EOL

Unit 'M', Sec. 29, T22S, R38E

Backhoe samples at junction (source)

Depth bgs. (ft)	[Cl ⁻] ppm
3	239
4	310
5	336
6	307
7	348
8	212
9	386
10	353
11	340
12	225

Groundwater = 124 ft





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

REVEGETATION FORM

1. General Information

Site name: BD M-29 EOL						
U/L M	Section 29	Township T22S	Range R38E	County Lea	Latitude 32° 21' 38.6"	Longitude 103° 5' 9.7"
Contact Name: Bruce Baker						
Email: bbaker@rice-ecs.com						
Site size: 660		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 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:				

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: Pecos District Mix 1 lb Boyd Johnston Mix	Seeding date: 9/30/2011
Broadcast <input checked="" type="checkbox"/>			
Method: Broadcast 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:			

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: Oscar Frayre	Title: Environmental Tech	Date: 9/30/2011
Signature:		

COPY