

1R - 426-313

REPORTS

DATE:

3-22-12

1R426-313

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2012 MAY -1 P 1:50

BD Jct. I-11-2
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
BD Jct. I-11-2: UL/I, Sec. 11, T22S, R37E
RICE Operating Company – Blinebry-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 I-11-2 junction box. The site is located in UL/I, Sec. 11, T22S, R37E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 59 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 6x3x12-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 32 mg/kg, a gasoline range organics (GRO) concentration below detectable limits and a diesel range organics (DRO) concentration of 19.3 mg/kg. A total of 12 cubic yards of excavated soil was properly disposed of at a NMOC approved facility. The excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area. On 11/10/2011, 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)	Jct. I-11-2	I	11	22S	37E	Lea	Length	Width	Depth
							Same location		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER Eugenia Pierce OTHER _____

Depth to Groundwater 59 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 1/20/2011 Date Completed 2/11/2011 OCD Witness No

Soil Excavated 8.0 cubic yards Excavation Length 6 Width 3 Depth 12 feet

Soil Disposed 12 cubic yards Offsite Facility Sundance Services, Inc. Location Eunice, NM

FINAL ANALYTICAL RESULTS: Sample Date 2/10/2011 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	0.2	<10.0	19.3	32

CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
background	6"	148
vertical delineation trench at the junction (source)	5'	212
	6'	151
	7'	148
	8'	N/A
	9'	146
	10'	137
	11'	143
	12'	88

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 6X3X12-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, 12 ft. BGS, was sent to a commercial laboratory for analysis of chloride and TPH, which confirmed low concentrations of each. A total of 12 cubic yards of soil was transported to a NMOCD approved disposal facility. The excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area. On 11/10/2011, 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 Larry Bruce Baker, Jr. SIGNATURE 

DATE 3-22-12

BD Jct. I-11-2

Unit I, Section 11, T22S, R37E



Collecting sample, facing north

2/10/2011



Backfilling site, facing south

2/11/2011



Seeding site, facing north

11/10/2011



Site complete with new water tight junction box installed, facing south

11/10/2011



February 11, 2011

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

RE: BD JCT I-11-2

Enclosed are the results of analyses for samples received by the laboratory on 02/10/11 16:20.

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: 02/10/2011
 Reported: 02/11/2011
 Project Name: BD JCT I-11-2
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 02/10/2011
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: SOURCE @ 12' (H100271-01)

Chloride, SM4500Cl-B			mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	02/11/2011	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	02/10/2011	ND	201	101	200	1.33		
DRO >C10-C28	19.3	10.0	02/10/2011	ND	199	99.7	200	2.54		

Surrogate: 1-Chlorooctane 103 % 70-130

Surrogate: 1-Chlorooctadecane 98.9 % 70-130

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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

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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

[illegible]

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising whether raised 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: 2/10/11 Time: 4:20		Received By: Jodi Benson		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #:	
Relinquished By:		Date:		Received By:		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Fax #:	
Delivered By: (Circle One) <u>UPS</u>		Sample Condition: Cool <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		CHECKED BY: (Initials) 		REMARKS: EMAIL, RUSH! 631-8909-ROBERT	

† 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: 930737	EXPIRATION DATE: 6/16/13
METER READING ACCURACY: 100.0	

ACCURACY : +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
BD	I-11-2	I	11	22 S	37 E

SAMPLE ID	PID	SAMPLE ID	PID
SOURCE @ 5'	2.2		
6'	8.2		
7'	5.1		
9'	3.9		
10'	6.0		
BACKGROUND	1.4		

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

SIGNATURE:

[Signature]

DATE:

1/20/11

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:

<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>

Model: PGM 7300
Model: PGM 7300
Model: PGM 7300

Serial No: 590-000183
Serial No: 590-000508
Serial No: 590-000504

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Model: PGM 7600
Model: PGM 7600
Model: PGM 7600

Serial No: 110-023920
Serial No: 110-013744
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
<u>BD</u>	<u>I-11-2</u>	<u>I</u>	<u>11</u>	<u>225</u>	<u>37E</u>

SAMPLE ID	PID	SAMPLE ID	PID
<u>SOURCE @ 11'</u>	<u>1</u>		
<u>12'</u>	<u>0.2</u>		

COPY

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

SIGNATURE: [Signature]

DATE: 2/10/11

CHLORIDE CONCENTRATION CURVE

RICE Operating Company

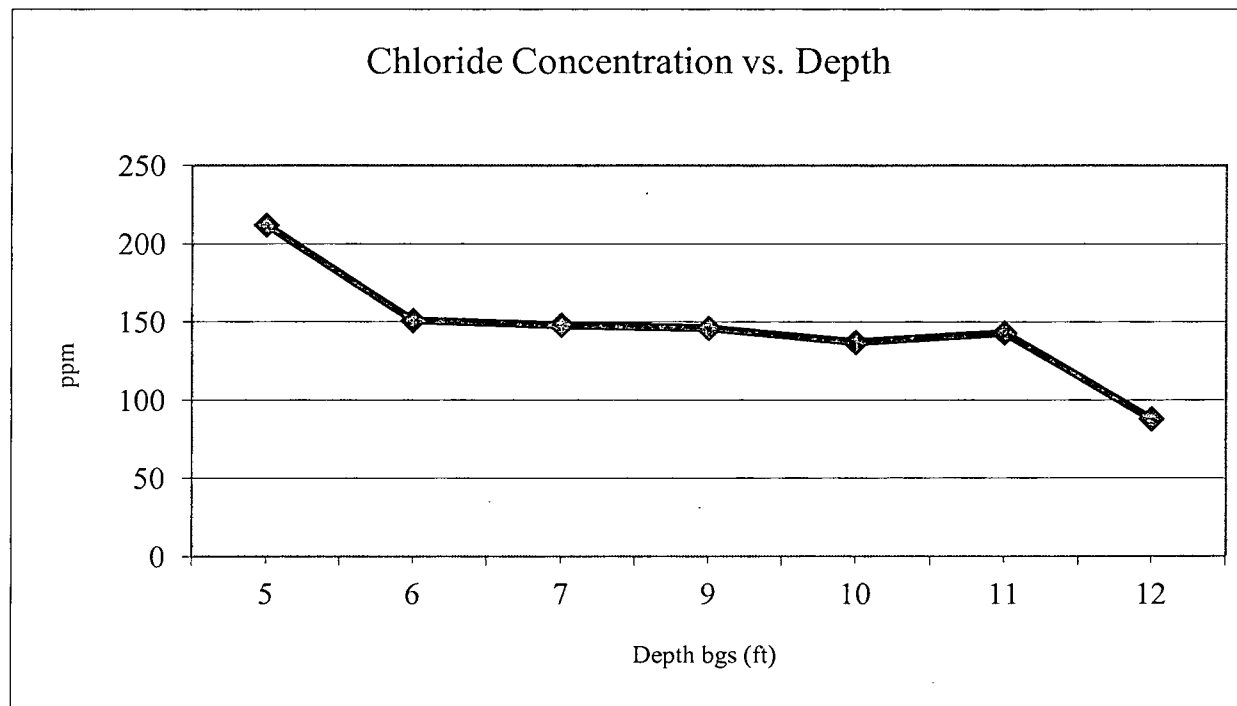
BD Jct. I-11-2

Unit 'I', Sec. 11, T22S, R37E

Backhoe samples at junction (source)

Depth bgs (ft)	[Cl] ppm
5	212
6	151
7	148
9	146
10	137
11	143
12	88

Groundwater = 59 ft





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

REVEGETATION FORM

1. General Information

Site name:		BD Jct. I-11-2				
U/L I	Section 11	Township 22S	Range 37E	County Lea	Latitude N 32° 24' 15.561"	Longitude W 103° 7' 45.31
Contact Name:		Bruce Baker				
Email:		bbaker@rice-ecs.com				
Site size: 1800		square feet:		Map detail of site attached <input 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: 11/10/2011					

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: 2 lbs of Boyd Johnston Mix	Seeding date: 11/10/2011
Broadcast <input checked="" type="checkbox"/>			
Method: hand broadcast			
Soil conditions during seeding: Dry <input checked="" type="checkbox"/> Damp <input type="checkbox"/> Wet <input type="checkbox"/>			
Photos attached <input 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: 11/10/11
Signature:		

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