

1R - 427-401

REPORTS

DATE:

3-4-13

1R427-401

EME M-25 EOL RECEIVED

2012

APR 2 2013

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

CLOSURE

RICE *Operating Company*

122 West Taylor • Hobbs, New Mexico 88240

Phone: (575) 393-9174 • Fax: (575) 397-1471

RECEIVED

April 1, 2013

APR 2 2013

Mr. Edward Hansen
New Mexico Energy, Minerals, & Natural Resources
Oil Conservation Division, Environmental Bureau
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

RE: Termination Request
EME M-25 EOL: UL/M, Sec. 25, T20S, 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 2012, ROC initiated work on the former M-25 EOL. The site is located in UL/M, Sec. 25, T20S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 107 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 3x7x7-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 7-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 and contoured to the surrounding area. On 8/13/2012, 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 location plat, final report, photo documentation, laboratory analysis, 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		
Eunice Monument Eumont (EME)	M-25 EOL	M	25	20S	36E	Lea	Length	Width	Depth
							Eliminated		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER Dale Cooper Family Trust OTHER _____

Depth to Groundwater 107 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 4/18/2012 Date Completed 4/18/2012 OCD Witness No

Soil Excavated 5.4 cubic yards Excavation Length 3 Width 7 Depth 7 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 4/18/2012 Sample Depth 7'

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 7' GRAB	0.9	<10	<10	<16

CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
background	6"	116
vertical delineation trench at the junction (source)	3'	149
	4'	120
	5'	147
	6'	172
	7'	147

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 3x7x7 ft. deep excavation. Chloride field tests performed on each sample yielded concentrations similar to that of the background sample. The deepest sample, 7 ft. below ground surface (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 8/13/2012, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

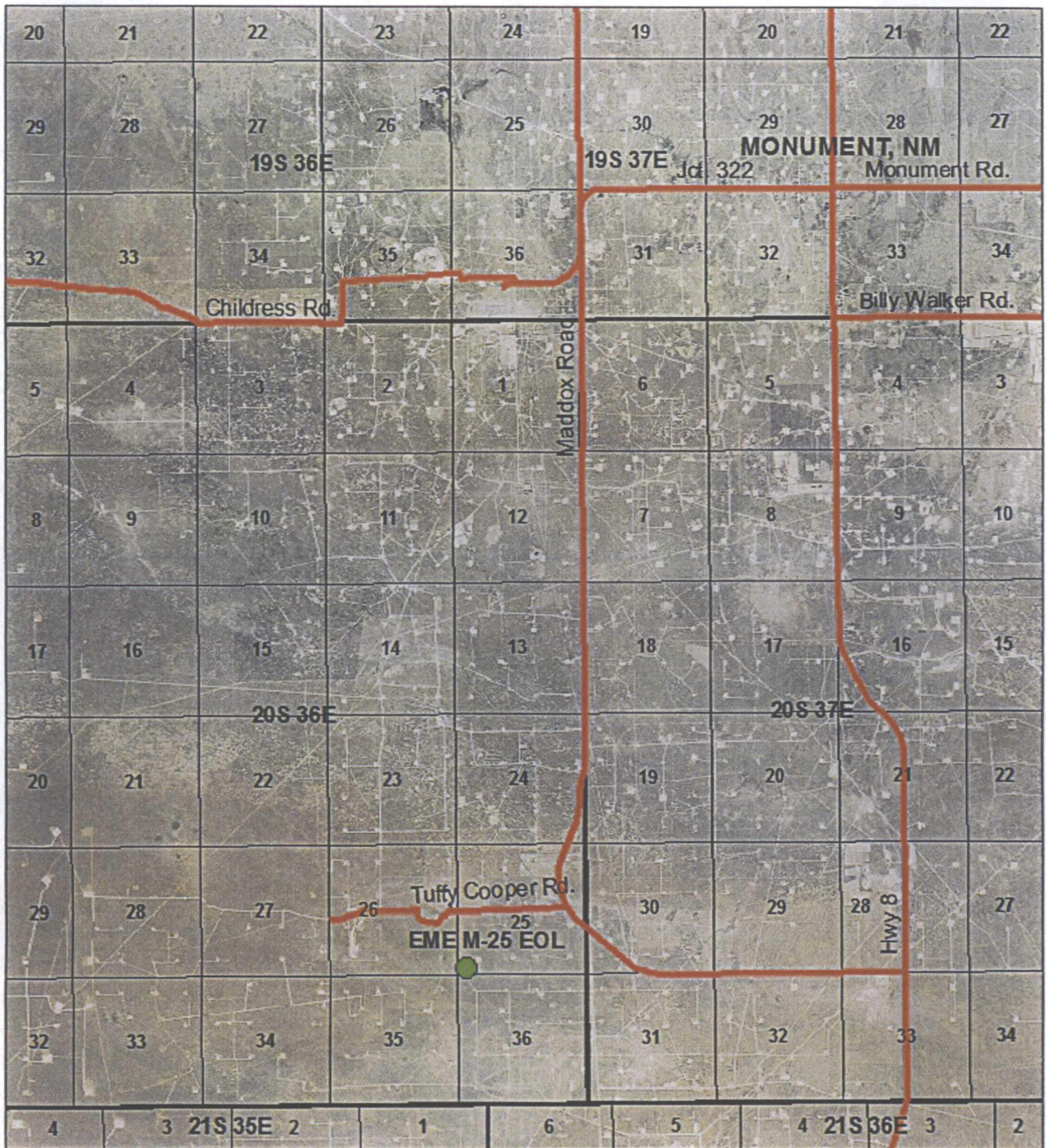
enclosures: site location map, photos, lab results, chloride graph, revegetation form

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

REPORT ASSEMBLED BY Laura Peña SIGNATURE  COMPANY Rice Operating

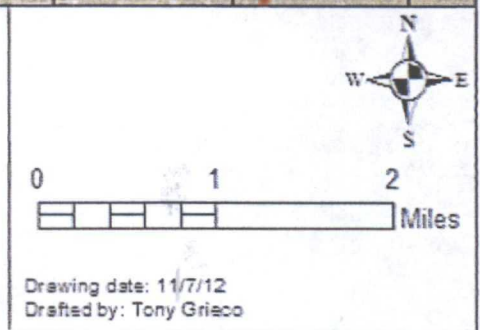
SITE SUPERVISOR Dustin Yarbrough SIGNATURE Not Available COMPANY Rice Environmental Consulting & Safety

PROJECT LEADER Zach Conder SIGNATURE  DATE 3-4-13



**EME M-25
EOL**

UL/M SECTION 25
T-20-S R-36-E
LEA COUNTY, NM



EME M-25 EOL

UL/M SEC. 25 (T20S-R36E)



Excavating site

4/18/2012



Collecting sample

4/18/2012



Backfilling site

4/18/2012



Seeding site

8/13/2012



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

April 20, 2012

ZACH CONDER

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: EME M-25 EOL

Enclosed are the results of analyses for samples received by the laboratory on 04/19/12 8:30.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab/accred_certif.html.

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 (V1, 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

Analytical Results For:

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

 Received: 04/19/2012
 Reported: 04/20/2012
 Project Name: EME M-25 EOL
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 04/18/2012
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

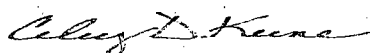
Sample ID: SOURCE @ 7' (H200898-01)

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AP				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	04/19/2012	ND	432	108	400	3.77	
TPH 8015M			mg/kg		Analyzed By: MS				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	04/19/2012	ND	160	79.9	200	2.07	
DRO >C10-C28	<10.0	10.0	04/19/2012	ND	165	82.5	200	0.115	
Surrogate: 1-Chlorooctane	103 %	55.5-154							
Surrogate: 1-Chlorooctadecane	103 %	57.6-158							

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

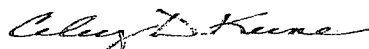
Notes and Definitions

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

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

CHLORIDE CONCENTRATION CURVE

RICE Operating Company

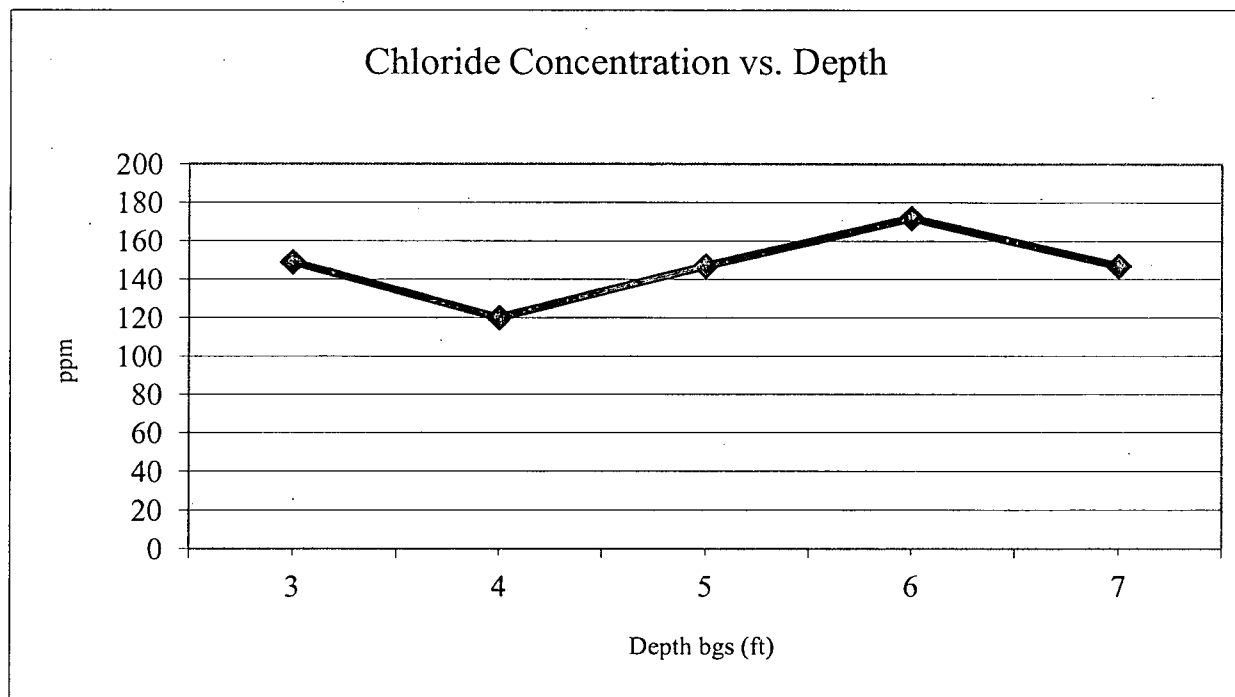
EME M-25 EOL

Unit 'M', Sec. 25, T20S, R36E

Backhoe samples at junction (source)

Depth bgs (ft)	[Cl] ppm
3	149
4	120
5	147
6	172
7	147

Groundwater = 107 ft





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

REVEGETATION FORM

1. General Information

Site name EME M-25 EOL						
U/L M	Section 25	Township 20S	Range 36E	County Lea	Latitude 32°32'15.365"	Longitude 103°18'56.34"W
Contact Name: Zach Conder						
Email: zconder@rice-ecs.com						
Site size: 35 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 checked="" type="checkbox"/>	Bioremediated <input type="checkbox"/>	Imported <input type="checkbox"/>	Blended <input type="checkbox"/>	Depth (in):	
Texture: Sandy		Describe soil & subsoil: Sandy soils and caliche			
Soil prep methods: <input type="checkbox"/>	Rip <input type="checkbox"/>	Depth(in):	Disc <input type="checkbox"/>	Depth (in):	Rollerpack <input type="checkbox"/>
Date completed: 4/18/2012					

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: 4 lbs. Blue Grama and 4 lbs. Side Oats Grama grass seed	Seeding date: 8/13/2012
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: Grass seed was raked into the soil		
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: Zach Conder	Title: Environmental Tech	Date: 8/13/2012
Signature: <i>Eduardo Guaco</i>		

COPY