

1R - 427-396

REPORTS

DATE:

3-4-13

1R427-396

EME J-29 EOL

2012

APR 2 2013

APR 2 2013

Off Conservation Division
220 S. St. Stephen's Drive
Santa Fe, NM 87501

CLOSURE

RICE *Operating Company*

122 West Taylor • Hobbs, New Mexico 88240

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

April 1, 2013

RECEIVED

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 J-29 EOL: UL/J, Sec. 29, T21S, 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 J-29 EOL junction box. The site is located in UL/J, Sec. 29, T21S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 225 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 10x10x12 ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in chloride concentrations that decreased with depth and low concentrations of TPH. 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 laboratory for analysis of chloride and TPH, resulting in a 4-wall chloride concentration of 512 mg/kg, a gasoline range organics (GRO) concentration below detectable limits and a diesel range organics (DRO) concentration of 90.1 mg/kg. The bottom composite resulted in a chloride concentration of 528 mg/kg, a GRO concentration below detectable limits and a DRO concentration of 18.9 mg/kg. The blended backfill resulted in a chloride concentration of 560 mg/kg, a GRO concentration below detectable limits, and a DRO concentration of 112 mg/kg. The excavation was backfilled with the blended soil to ground surface and contoured to the surrounding area. On 2/22/2013, 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 stylized flourish at the end.

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)	J-29 EOL	J	29	21S	36E	Lea	Length	Width	Depth
							Eliminated		

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

Depth to Groundwater 225 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 2/17/2012 Date Completed 3/20/2012 OCD Witness No

Soil Excavated 44.4 cubic yards Excavation Length 10 Width 10 Depth 12 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 3/20/2012 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.	2.2	<50	90.1	512
BOTTOM COMP.	3.0	<10	18.9	528
BLENDED BACKFILL	2.7	<50	112	560

CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
background	6"	89
4-WALL Comp	n/a	284
Bottom Comp	12'	278
Blended Backfill	n/a	278
Vertical delineation trench at the former junction (source)	3'	549
	4'	342
	5'	346
	6'	349
	7'	358
	8'	394
	9'	374
	10'	307
	11'	258
	12'	208

General Description of Remedial Action: This junction box 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, producing a 10 x 10 x 12 ft deep excavation. Chloride field tests performed on soil samples yielded generally low concentrations. Organic vapors were measured using a PID which yielded low concentrations. 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 laboratory for analysis of chloride and TPH. The excavation was backfilled with blended soil to ground surface and contoured to the surrounding area. On 2/22/2013, 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, laboratory analysis, PID (field) screenings, chloride graph, revegetation form

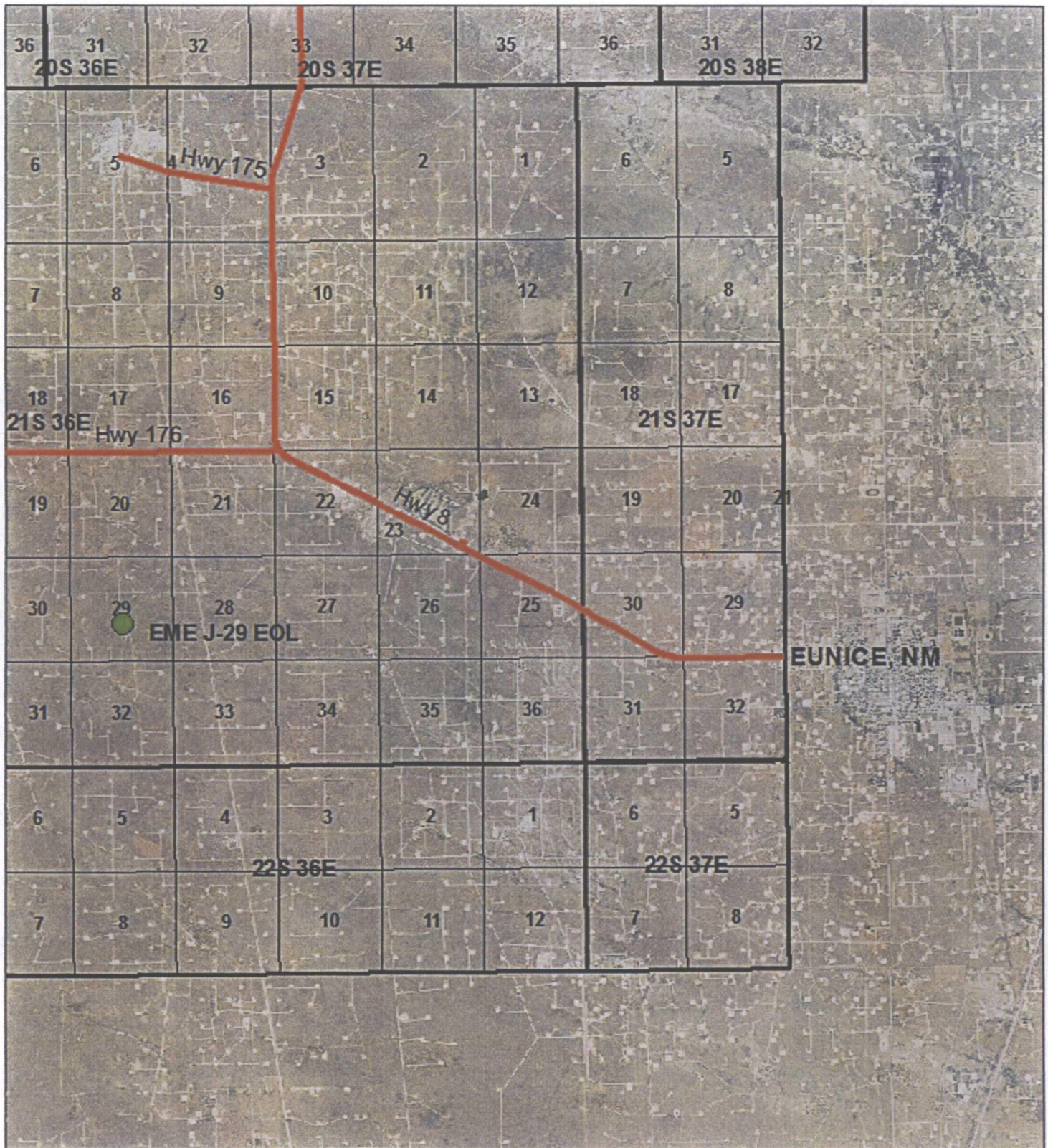
I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

REPORT

ASSEMBLED BY Laura Peña SIGNATURE  COMPANY Rice Operating

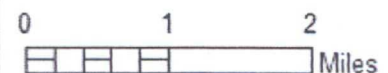
SITE SUPERVISOR Oscar Frayre SIGNATURE Not Available COMPANY Rice Environmental Consulting & Safety

PROJECT LEADER Zach Conder SIGNATURE  DATE 3-4-13



EME J-29 EOL

UL/J SECTION 29
T-21-S R-36-E
LEA COUNTY, NM



Drawing date: 11/7/12
Drafted by: Tony Grieco

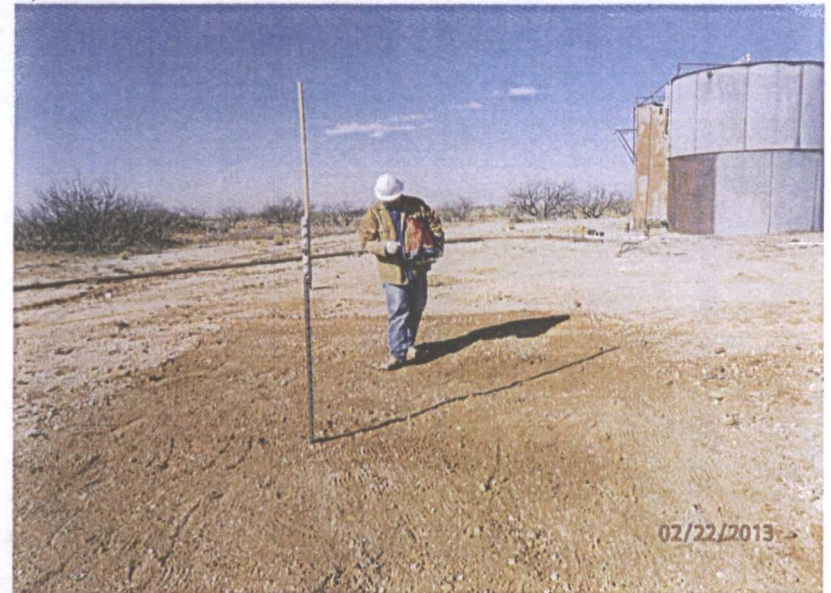
EME J-29 EOL

Unit J, Section 29, T21S, R36E



Excavating site, facing west

3/19/2012



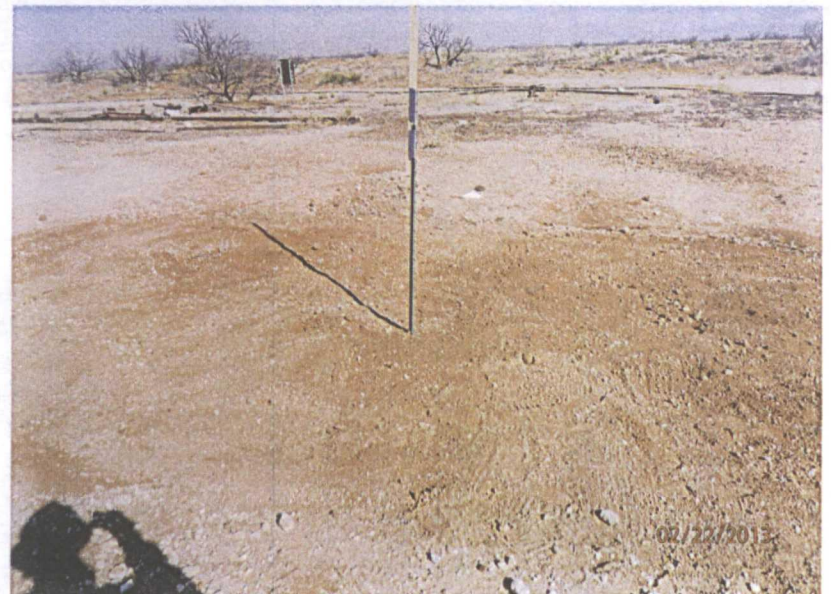
Seeding site, facing west

2/22/2013



Raking in seed, facing south

2/22/2013



Site completed

2/22/2013



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

March 22, 2012

ZACH CONDER

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: EME J-29 EOL

Enclosed are the results of analyses for samples received by the laboratory on 03/20/12 16:50.

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/ga/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,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager

COPY

Analytical Results For:

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

 Received: 03/20/2012
 Reported: 03/22/2012
 Project Name: EME J-29 EOL
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 03/20/2012
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: 5 PT BTM COMP (H200692-01)

Chloride, SM4500Cl-B			mg/kg							Analyzed By: HM
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	528	16.0	03/22/2012	ND	384	96.0	400	8.00		
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	03/22/2012	ND	177	88.5	200	3.05		
DRO >C10-C28	18.9	10.0	03/22/2012	ND	166	82.9	200	2.14		
Surrogate: 1-Chlorooctane			115 %	55.5-154						
Surrogate: 1-Chlorooctadecane			110 %	57.6-158						

Sample ID: 4 WALL COMP (H200692-02)

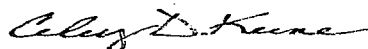
Chloride, SM4500Cl-B			mg/kg							Analyzed By: HM
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	512	16.0	03/22/2012	ND	384	96.0	400	8.00		
TPH 8015M			mg/kg							Analyzed By: MS
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<50.0	50.0	03/22/2012	ND	177	88.5	200	3.05		
DRO >C10-C28	90.1	50.0	03/22/2012	ND	166	82.9	200	2.14		
Surrogate: 1-Chlorooctane			109 %	55.5-154						
Surrogate: 1-Chlorooctadecane			107 %	57.6-158						

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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

Analytical Results For:

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

 Received: 03/20/2012
 Reported: 03/22/2012
 Project Name: EME J-29 EOL
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 03/20/2012
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: 8 PT BLENDED BACKFILL (H200692-03)

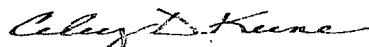
Chloride, SM4500Cl-B			mg/kg							
			Analyzed By: HM							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	560	16.0	03/22/2012	ND	384	96.0	400	8.00		
TPH 8015M			mg/kg							
			Analyzed By: MS							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<50.0	50.0	03/22/2012	ND	177	88.5	200	3.05		
DRO >C10-C28	112	50.0	03/22/2012	ND	166	82.9	200	2.14		
Surrogate: 1-Chlorooctane	110 %	55.5-154								
Surrogate: 1-Chlorooctadecane	107 %	57.6-158								

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* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

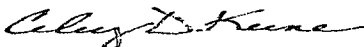
ND Analyte NOT DETECTED at or above the reporting limit
RPD Relative Percent Difference
** Samples not received at proper temperature of 6°C or below.
*** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
Samples reported on an as received basis (wet) unless otherwise noted on report

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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>Rice Operating</u>		BILL TO		ANALYSIS REQUEST																						
Project Manager: <u>Zach Conder</u>		P.O. #:		<div style="writing-mode: vertical-rl; transform: rotate(180deg);">CL 7/18/15 M</div>																						
Address: <u>1322 W Taylor</u>		Company:																								
City: <u>Hobbs</u> State: <u>NM</u> Zip: <u>88240</u>		Attn:																								
Phone #: _____ Fax #: _____		Address:																								
Project #: _____ Project Owner:		City:																								
Project Name:		State: _____ Zip: _____																								
Project Location: <u>EME 5-29 EOL</u>		Phone #: _____																								
Sampler Name: <u>Osor Foye</u>		Fax #: _____																								
FOR LAB USE ONLY																										
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS													MATRIX		PRESERV.	SAMPLING							
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER	ACID/BASE	ICE / COOL	OTHER	DATE	TIME												
<u>H2001892</u>																										
1	<u>5pt Bottom Comp</u>	<u>C</u>				<u>X</u>							<u>3-20-12</u>	<u>1:00</u>	<u>X</u>	<u>X</u>										
2	<u>4 WALL Comp</u>	<u>C</u>				<u>X</u>							<u>3-20-12</u>	<u>1:25</u>	<u>X</u>	<u>X</u>										
3	<u>8pt Blended Backfill</u>	<u>C</u>				<u>X</u>							<u>3-20-12</u>	<u>1:50</u>	<u>X</u>	<u>X</u>										

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 90 days after completion of the analytical services. 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>3/20/12</u>	Received By: <u>[Signature]</u>	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #: _____
	Time: <u>4:50</u>		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #: _____
Relinquished By: <u>[Signature]</u>	Date: _____	Received By: _____	REMARKS: <u>Bruce, Hoch, Zach, Katie, Larra, Osor</u>	
	Time: _____		<u>Email Everyone please!</u>	
Delivered By: (Circle One)	Sample Condition	CHECKED BY: <u>[Signature]</u>		
Sampler - UPS - Bus - Other:	Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/>			
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			

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 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 checked="" type="checkbox"/>	MODEL: PGM 7300	SERIAL NO: 590-902072

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO : HAL-248-100-1	EXPIRATION DATE: 7/1/2015
METER READING ACCURACY: 100 ppm	

ACCURACY : +/- 2%

COMPANY
Rice Operating Company

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	J-29 EOL	J	29	21S	36E

SAMPLE ID	PID	SAMPLE ID	PID
5 PT. BOTTOM COMP.	3.0		
4-WALL COMP.	2.2		
BLENDED BACKFILL	2.7		

COPY

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

SIGNATURE: Not Available

DATE: 3/20/2012

CHLORIDE CONCENTRATION CURVE

RICE Operating Company

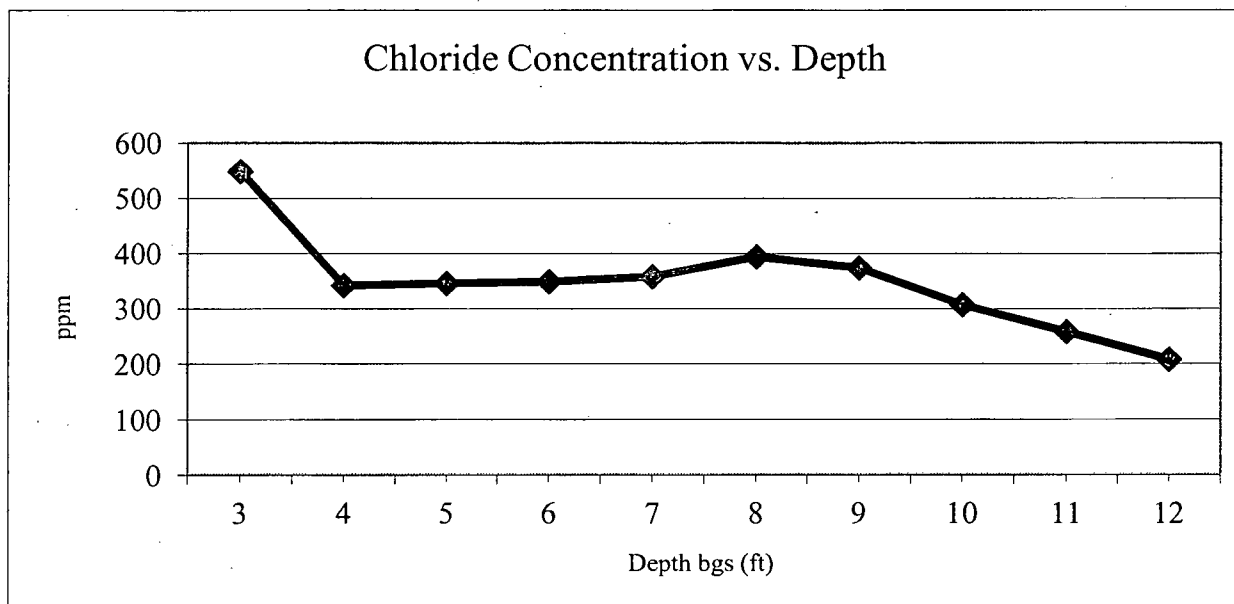
EME J-29 EOL

Unit 'J', Sec. 29, T21S, R36E

Backhoe samples at junction (source)

Depth bgs (ft)	[Cl ⁻] ppm
3	549
4	342
5	346
6	349
7	358
8	394
9	374
10	307
11	258
12	208

Groundwater = 225 ft





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

REVEGETATION FORM

1. General Information

Site name: EME J-29 EOL						
U/L J	Section 29	Township T-21-S	Range R-36-E	County Lea	Latitude N32°26'52.5"	Longitude W103°17'13.7"
Contact Name: Hack Conder						
Email: hconder@riceswd.com						
Site size: 400 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 checked="" 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: 3/20/2012				

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: 1 lbs. Lea co. Mix/1 lbs. Side Oats/1 lbs. Winter Wheat	Seeding date: 2/22/2013
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:	The Seed was Raked into the soil.		

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: Kyle Norman	Title: Environmental Tech	Date: 2/22/2013
Signature: <i>Kyle Norman</i>		

COPY