

1R - 427-172

REPORTS

DATE:

1-5-11



Infrastructure, environment, buildings

RECEIVED OGD

2011 JAN 11 P 2: 12

ARCADIS U.S.
1004 North Big Spring Street
Suite 300
Midland
Texas 79701
Tel 432 687 5400
Fax 432 687 5401
www.arcadis-us.com

Sent Certified Mail
Return Receipt No. 7002 2410 0001 5813 3746

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

Environmental

Subject:

**TERMINATION REQUEST
Eunice Monument Eumont (EME) SWD Gaither Boot
UNIT 'P', SEC. 34, T19S, R36E
NMOCD CASE # 1R427-172**

Date:
January 5, 2011

Contact:
Sharon E. Hall

Mr. Hansen:

On behalf of Rice Operating Company (ROC), ARCADIS U.S., Inc. (ARCADIS) respectfully submits this Termination Request for the above-referenced site.

Phone:
432 687-5400

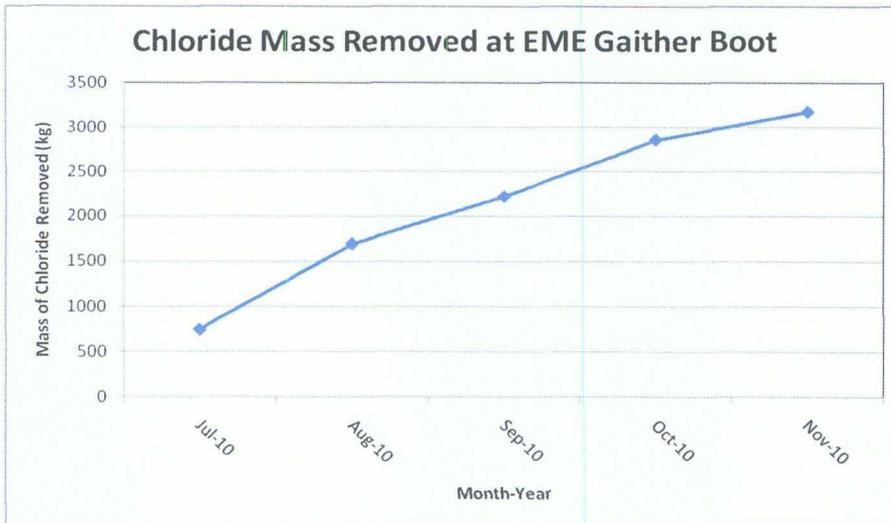
NMOCD approved ROC's Corrective Action Plan (CAP) and subsequent addendums on July 19, 2010. The CAP called for soil removal to a depth of six inches below ground surface, clean fill backfilling and seeding of the site. It also proposed an estimation of the chloride mass that may have contributed to groundwater impact at the former junction box location, and a plan for the removal of that chloride mass. The approved chloride mass estimation and plan for removal is as follows:

Email:
sharon.hall@arcadis-us.com

ROC proposed, and NMOCD approved, utilizing the existing groundwater recovery system located at the EME L-6 Boot location to recover an estimated 3,144 kilograms (kg) of chloride mass.

Our ref:
MT000910.0001

As of November 26, 2010, a total of 83,790 gallons of groundwater had been recovered from the recovery system located at EME L-6 boot. This equates to a total recovered chloride mass of 3,172 kg. The following graph depicts the cumulative chloride mass removed at the site since recovery began in July 2010. The chloride mass removal estimate is based on chloride concentrations of 10,000 milligrams per liter (see attached laboratory report.)



Ed Hansen
January 5, 2011

On August 20, 2010, the site was scraped and the scraped material was disposed of at an NMOCD approved facility. Clean, imported soil was used to backfill the site and to contour the site to the surrounding area. Silt net fencing was installed and the site was seeded on August 20, 2010 and again on November 30, 2010. Seeding documentation is attached.

Upon NMOCD approval of this Termination Request, monitoring wells MW-1 and MW-2 will be plugged using a cement grout with 1 to 3% bentonite.

ROC has met all abatement requirements in accordance with 19.15.29 NMAC, and respectfully requests termination of the regulatory file for this site.

ROC is the service provider (agent) for the EME Salt Water Disposal System and has no ownership of any portion of pipeline, well or facility. The EME SWD System is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis.

Thank you for your consideration concerning this request for site termination. If you have any questions please contact Hack Conder at (575) 393-9174.

Sincerely,
 ARCADIS

Sharon E. Hall

Sharon E. Hall
 Associate Vice President

Copies:
 Hack Conder, ROC

Attachments:
 Site Photographs
 Revegetation Form
 Laboratory Report

EME Gaither boot
UNIT 'I', SEC. 34, T19S, R36E
NMOCD CASE # 1R427-172



scraping the site

8/20/2010



hauling off scraped soil

8/20/2010



clean, imported soil

8/20/2010



seeding the backfilled site

8/20/2010



seeding

11/30/2010



raking in the seed

11/30/2010



112 West Taylor
 Hobbs, NM 88240
 Phone: (575) 393-9174
 Fax: (575) 393-0293

REVEGETATION FORM

1. General Information

Site name: EME Gaither Boot						
U/L I	Section 34	Township 19S	Range 36E	County LEA	Latitude 32 36' 53.404" N.	Longitude 103 20' 17.433"W
Contact Name: Bruce Baker						
Email: bbaker@riceswd.com						
Site size: 200		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 type="checkbox"/>	Blended <input type="checkbox"/>	Depth (in):
Texture: Sandy		Describe soil & subsoil: Sand over Caliche		
Soil prep methods: Rip <input type="checkbox"/>	Depth(in):	Disc <input type="checkbox"/>	Depth (in):	Rollerpack <input type="checkbox"/>
Date completed: 08-20-10				

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: Blue Grama & Winter Wheat	Seeding date: 11-30-2010
Broadcast <input checked="" type="checkbox"/>			
Method: Broadcast by hand seeder			
Soil conditions during seeding: Dry <input checked="" type="checkbox"/> Damp <input type="checkbox"/> Wet <input type="checkbox"/>			
Photos attached <input checked="" type="checkbox"/>	Observations: 1 lb of Blue grama and 1lb of winter wheat		
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: Dak Harris	Title: Environmental Tech	Date: 11-30-2010
Signature: <i>Dak Harris</i>		

November 11, 2010

Hack Conder
Rice Operating Company
112 W. Taylor
Hobbs, NM 88240

RE: EME L-6

Enclosed are the results of analyses for samples received by the laboratory on 11/09/10 15:27.

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

Analytical Results For:

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

Received: 11/09/2010
 Reported: 11/11/2010
 Project Name: EME L-6
 Project Number: NONE GIVEN
 Project Location: EME L-6

Sampling Date: 11/08/2010
 Sampling Type: Water
 Sampling Condition: ** (See Notes)
 Sample Received By: Jodi Henson

Sample ID: WATER FROM RW-1 (H021259-01)

Chloride, SM4500Cl-B		mg/L		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	10000	4.00	11/11/2010	ND	104	104	100	3.92	

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

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Celey D. Keene, Lab Director/Quality Manager

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603
 (505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

Company Name: Rice Operating Company		P.O. #:		ANALYSIS REQUEST	
Project Manager: Hack Conder		Company:			
Address: 122 West Taylor		Attn:		Complete Cations/Anions	
City: Hobbs		Address:		Texas TPH	
Phone #: 575-393-9174		City:		BTEX	
Project #:		State:		TPH 8015 M	
Project Name: EME L-6		Phone #:		Chlorides	
Project Location: EME L-6		Fax #:		✓	
Sampler Name: Jordan Woodfin		PRESERV			
FOR LAB USE ONLY		MATRIX		DATE	
Lab I.D.		WASTEWATER		TIME	
Sample I.D.		GROUNDWATER		11/8/10	
H21259.1		SLUDGE		02:00	
Water From RW-1		OIL			
		ACID/BASE			
		ICE/COOL			
		OTHER:			
		# CONTAINERS			
		(G)RAB OR (C)OMP			

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Relinquished By: Jordan Woodfin Date: 11-9-10 Received By: Ardi Benson

Relinquished By: _____ Date: _____ Received By: _____

Delivered By: (Circle One) Salyer Sample Condition: Cool Intact Checked By: [Signature]

Salyer - UPS - Bus - Other: _____

Phone Result: Yes No Add'l Phone #: _____
 Fax Result: Yes No Add'l Fax #: _____

REMARKS: email results

Hcorder@riceswd.com; jwoodfin@riceswd.com;
 Lweinheimer@riceswd.com kjonas@riceswd.com

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