

1R - 425-49

**APPROVALS**

**YEAR(S):**

2012

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**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Wednesday, May 16, 2012 3:17 PM  
**To:** Hack Conder (hconder@riceswd.com)  
**Cc:** Leking, Geoffrey R, EMNRD; Katie Jones <kjones@riceswd.com> (kjones@riceswd.com); Laura Pena (lpena@riceswd.com); Scott Curtis (scurtis@riceswd.com)  
**Subject:** Remediation Plan (1R425-49) Termination - ROC Vacuum I-32 Vent Boot Site

**RE: Termination Request  
for the Rice Operating Company's  
Vacuum I-32 Vent Boot Site  
Unit Letter I, Section 32, T17S, R35E, NMPM, Lea County, New Mexico  
Remediation Plan (1R425-49) Termination**

Dear Mr. Conder:

The New Mexico Oil Conservation Division (OCD) has received Rice Operating Company's report and request to close the above-referenced site, dated May 11, 2012 (received May 14, 2012). The report is acceptable to the OCD.

The above-referenced report, submitted in accordance with 19.15.29 NMAC (Rule 29; formally, Rule 116), indicates that Rice Operating Company has met the requirements of 19.15.29 NMAC; therefore, the OCD approves the report and hereby notifies you that the remediation plan (1R425-49) is terminated in accordance with 19.15.29 NMAC.

Please be advised that OCD approval of this report does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have any questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen  
Hydrologist  
Environmental Bureau

# **RICE** *Operating Company*

122 West Taylor • Hobbs, New Mexico 88240

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

May 11, 2012

RECEIVED

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

MAY 14 2012

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

RE: Termination Request  
Vacuum I-32 vent boot (1R425-49): UL/I, Sec. 32, T17S, R35E  
RICE Operating Company – Vacuum SWD System

Mr. Hansen:

Rice Operating Company (ROC) is the service provider (agent) for the abandoned Vacuum 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 2008, ROC initiated work on the former I-32 vent boot junction box as part of the system abandonment. The site is located in UL/I, Sec. 32, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 80 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x3x12-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, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The excavated soil was returned to the excavation to ground surface. Clean, imported soil was used as a top cap and to contour the site to the surrounding area. On 3/20/2008, 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, and PID sheet 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		
Vacuum	vent 1-32 boot	1	32	17S	35E	Lea	Length	Width	Depth
							no box; system abandonment		

LAND TYPE: BLM \_\_\_\_\_ STATE X FEE LANDOWNER \_\_\_\_\_ OTHER \_\_\_\_\_

Depth to Groundwater 80 feet NMOC SITE ASSESSMENT RANKING SCORE: 10

Date Started 3/4/2008 Date Completed 3/19/2008 OCD Witness no

Soil Excavated 7 cubic yards Excavation Length 5 Width 3 Depth 12 feet

Soil Disposed 0 cubic yards Offsite Facility n/a Location n/a

**FINAL ANALYTICAL RESULTS:** Sample Date 3/4/2008 Sample Depth 12 ft

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

**CHLORIDE FIELD TESTS**

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SOURCE 12' GRAB	0.0	<10.0	<10.0	32

LOCATION	DEPTH	mg/kg
background	6"	73
vertical delineation trench at junction (source)	7'	127
	8'	173
	9'	126
	10'	103
	11'	179
	12'	103

**General Description of Remedial Action:** This junction was addressed under the Vacuum SWD System abandonment. After this junction was removed, an investigation was conducted using a backhoe to collect soil samples at regular intervals producing a 5x3x12-ft-deep hole. Chloride field tests were performed on each sample, which yielded low concentrations. Organic vapors were measured using a PID, which also 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. The excavated soil was returned to the excavation and clean, imported soil was used as a top cap and to contour to the surrounding area. On 3/20/2008, 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 screening, chloride curve

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

SITE SUPERVISOR Roy Rascon SIGNATURE not available COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Katie Jones INITIAL KJ

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE Larry Bruce Baker Jr. DATE 9-22-08

## Vacuum vent I-32 boot

Unit I, Section 32, T17S, R35E



undisturbed junction box, facing north

10/25/2005



delineation trench at former junction site

3/04/2008



backfilled site, facing east

3/19/2008



seeding backfilled site, facing north

3/20/2008





# ARDINAL LABORATORIES

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

ANALYTICAL RESULTS FOR  
RICE OPERATING CO.  
ATTN: ROY R. RASCON  
122 W. TAYLOR  
HOBBS, NM 88240  
FAX TO: (575) 397-1471

COPY

Receiving Date: 03/05/08  
Reporting Date: 03/06/08  
Project Owner: NOT GIVEN  
Project Name: VAC. VENT I-32 BOOT  
Project Location: NOT GIVEN

Sampling Date: 03/04/08  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: BC  
Analyzed By: CK/HM

LAB NUMBER	SAMPLE ID	GRO (C <sub>6</sub> -C <sub>10</sub> ) (mg/kg)	DRO (C <sub>10</sub> -C <sub>28</sub> ) (mg/kg)	CI* (mg/kg)
ANALYSIS DATE		03/05/08	03/05/08	03/05/08
H14375-1	SOURCE @ 12' BGS GRAB INITIAL	<10.0	<10.0	32
Quality Control		558	560	490
True Value QC		500	500	500
% Recovery		112	112	98.0
Relative Percent Difference		2.8	17.1	4.0

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI: Std. Methods 4500-CIB  
\*Analysis performed on a 1:4 w/v aqueous extract.

*Robert A. Kame*  
Chemist

03/07/08  
Date

RECEIVED

MAR 11 2008

H14375TCL RICE

RICE OPERATING  
HOBBS, NM

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 services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise. Results

## • CARDINAL LABORATORIES

2111 Beechwood, Abilene, TX 79603 101 East Marland, Hobbs, NM 88240

(325) 673-7001 FAX (325) 673-7020 (505) 393-2326 FAX (505) 393-2476

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## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]

**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 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: <i>Roy R. Rascon</i>		Date: <i>3-5-08</i>	Received By:	Phone Result: Yes No Add'l Phone #:
		Time: <i>0756</i>		Fax Result: X Yes No Add'l Fax #:
Relinquished By:		Date:	Received By: <i>Burton A. Cook</i>	REMARKS: PLEASE E-MAIL TO <a href="mailto:jpurvis@riceswd.com">jpurvis &amp; rrascon@riceswd.com</a>
		Time:		
Delivered By: (Circle One)		Sample Condition		
Sampler - UPS - Bus - Other:		CHECKED BY: (Initials)		

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



# RICE OPERATING COMPANY

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

COPY

CK.	
MODEL	X
NO.	

MODEL: PGM 7600	SERIAL NO: 110-013676
MODEL: PGM 7600	SERIAL NO: 110-013744
MODEL: PGM 7600	SERIAL NO: 110-012383
MODEL: PGM 7600	SERIAL NO: 110-012920

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 07-3353	EXPIRATION DATE: 5-16-09
FILL DATE: 11-16-07	METER READING ACCURACY: 100.0

ACCURACY: +/- 2%.

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
VAC	VENT I-32 BOOT	I	32	17S	35E

SAMPLE ID	PID	SAMPLE ID	PID
VERT @ SOURCE W/BACKHOE @ 1'			
2'			
3'			
4'			
5'			
6'			
7'	0		
8'	0		
9'	0		
10'	1.2		
11'	0		
12'	0		

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

SIGNATURE:

*Roy R. RASLOW*

DATE: 3-4-08