

1R - 425-42

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, May 17, 2012 11:06 AM
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 (1R425-42) Termination - ROC Vacuum Jct P-27 Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum Jct P-27 Site
Unit Letter P, Section 27, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-42) 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 4, 2012 (received May 14, 2012) and the additional field analytical data received May 15, 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 (1R425-42) 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 4, 2012

RECEIVED

MAY 14 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

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

RE: Termination Request
Vacuum Jct. P-27 (1R425-42): UL/P, Sec. 27, 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 2007, ROC initiated work on the former P-27 junction box as part of the system abandonment. The site is located in UL/P, Sec. 27, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 85 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 9x3x9-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 9-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 240 mg/kg, a concentration of gasoline range organics (GRO) below detectable limits, and a diesel range organics (DRO) concentration of 500 mg/kg. 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 8/29/2007, 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". The signature is fluid and cursive, with a long horizontal stroke 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	NEW BOX DIMENSIONS - FEET		
							Length	Width	Depth
Vacuum	Jct. P-27	P	27	17S	35ED	Lea	no box; System abandonment		

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

Depth to Groundwater 85 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 8/17/2007 Date Completed 8/29/2007 NMOCD Witness no

Soil Excavated 9 cubic yards Excavation Length 9 Width 3 Depth 9 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 8/20/2007 Sample Depth 9 ft

TPH and chloride laboratory test results completed by using an approved laboratory and testing procedures pursuant to NMOCD guidelines.

CHLORIDE FIELD TESTS

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
GRAB @ 9 ft BGS	33.5	<10.0	500.0	240

LOCATION	DEPTH (ft)	ppm
trench at former junction	9	367

General Description of Remedial Action:

This junction box was addressed as part of the Vacuum SWD System abandonment. After the box lumber was removed and the pipelines were capped, a delineation trench was made at the site to collect soil samples. Excavation was difficult due to hard caliche rock but the trench was extended to 9 ft BGS. Chloride field tests were conducted on the samples and yielded very low concentrations. Organic vapors were measured and also yielded very low concentrations. The grab samples from the deepest part of the trench (9 ft) was sent to a laboratory for confirmation and TPH analysis. TPH results meet NMOCD guidelines. The excavated soil was returned to the trench and the remainder of the hole (from removal of the junction box) was backfilled with clean, imported soil which was also spread on the surface to encourage regrowth. The surface was seeded with a blend of native vegetation on 8/29/2007 and is expected to return to productive capacity at a normal rate.

enclosures: photos, lab results, PID field screenings

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

SITE SUPERVISOR Roy Rascon SIGNATURE Roy Rascon COMPANY RICE Operating Company

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE Kristin Farris Pope
DATE 11/1/2007 TITLE Project Scientist

Vacuum jct. P-27

Unit P, Sec. 27, T17S, R35E



undisturbed junction box

8/22/2005



9-ft delineation trench prior to backfill

8/21/2007



spreading imported soil

8/29/2007



seeding

8/29/2007



**ARDINAL
LABORATORIES**

PHONE (325) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

RECEIVED

ANALYTICAL RESULTS FOR
RICE OPERATING CO.
ATTN: ROY R. RASCON
122 W. TAYLOR
HOBBS, NM 88240
FAX TO: (505) 397-1471

AUG 27 2007

RICE OPERATING
HOBBS NM

Receiving Date: 08/20/07
Reporting Date: 08/23/07
Project Number: NOT GIVEN
Project Name: VAC JCT P-27
Project Location: NOT GIVEN

Sampling Date: 08/20/07
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: HM
Analyzed By: BC/HM

COPY

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (>C ₁₀ -C ₂₈) (mg/Kg)	CI* (mg/Kg)
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ANALYSIS DATE	08/21/07	08/21/07	08/21/07
H13137-1 SOURCE @ 9' BGS GRAB	<10.0	500	240
Quality Control	791	789	500
True Value QC	800	800	500
% Recovery	98.8	98.6	100
Relative Percent Difference	4.4	3.6	2.0

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

Bryan R. Cook

Chemist, All

8/23/07

Date

H13137 RICE

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.



CARDINAL 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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: <u>RICE OPER Co.</u>		BILL TO		ANALYSIS REQUEST											
Project Manager: <u>Roy R. Rascon</u>		P.O. #:													
Address: <u>122 W Taylor</u>		Company:													
City: <u>Hobbs</u> State: <u>NM</u> Zip: <u>88240</u>		Attn:													
Phone #: <u>393-9174</u> Fax #: <u>397-1471</u>		Address:													
Project #: _____ Project Owner: _____		City:													
Project Name: <u>VACUCT P-27</u>		State: _____ Zip: _____													
Project Location: _____		Phone #:													
Sampler Name: <u>Roy R. Rascon</u>		Fax #:													
FOR LAB USE ONLY.												TPH 80.5 M ✓			
Lab I.D.		Sample I.D.		GRAB OR (COMP. # CONTAINERS)		MATRIX			PRESERV					SAMPLING	
						GROUNDWATER			ACID/BASE			DATE		TIME	
						WASTEWATER			ICE / COOL						
						SOIL			OTHER:						
						OIL			OTHER:						
						SLUDGE									
<u>A13137-1</u>		<u>SOURCE @ 9' BGS GRAB</u>		<u>G</u>					<u>✓</u>			<u>8-20-07</u>		<u>1320</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 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: <u>Roy R. Rascon</u>	Date: <u>8-17-07</u> Time: <u>1443</u>	Received By:	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #:
Relinquished By:	Date: <u>8/24/07</u> Time:	Received By: <u>Hope S. McSwain</u>	Fax Result: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Add'l Fax #:
Delivered By: (Circle One) <u>Sampler</u> - UPS - Bus - Other:	Sample Condition Cool: <input type="checkbox"/> Intact: <input type="checkbox"/> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	CHECKED BY: (Initials)	REMARKS: <u>E-mail to JPURVIS & RRASCON @ RISE S&D.COM</u>

† 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

CK.	
MODEL	
NO.	X

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 : 06-3079	EXPIRATION DATE: 3-6-07
FILL DATE: 3-16-07	METER READING ACCURACY: 100.0

ACCURACY : +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
VAC	P-27	P	27	17S	35E

SAMPLE ID	PID	SAMPLE ID	PID
VERT @ SOURCE @ 1'			
2'			
3'			
4'			
5'			
6'			
7'	34.9		
8'	35		
9'	33.5		
10'			
11'			
12'			

COPY

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

SIGNATURE: *Loy R. Rascon*

DATE: 8-20-07

Hansen, Edward J., EMNRD

From: Laura Pena <lpena@riceswd.com>
Sent: Tuesday, May 15, 2012 4:13 PM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder; Katie Jones
Subject: Vacuum Jct. P-27 (1R425-42)
Attachments: Vacuum Jct. P-27 (1R425-42) Vertical Data.pdf

Mr. Hansen,

Attached is the vertical data for the Vacuum Jct. P-27 (1R425-42) site as requested.

If you have any questions or require more information, please do not hesitate to contact Hack Conder at (575) 631-6432.

Thank you,
Laura Peña

Location: Vacuum Jct. P-27 (1R425-42)		
Depth to GW: 85'		Landowner: State
Vertical @ Source		
	Cl-	PID
1'		
2'		
3'		
4'		
5'		
6'	129	2.9
7'	134	34.9
8'	176	35
9'	367	33.5