

1R - 425-48

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, May 21, 2012 1:33 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 (1R425-48) Termination - ROC Vacuum Jct B-5-2 Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum Jct B-5-2 Site
Unit Letter B, Section 5, T18S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-48) 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) and the photo documentation of May 21, 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 (1R425-48) 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 Jct. B-5-2 (1R425-48): UL/B, Sec. 5, T18S, 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 2006, ROC initiated work on the former B-5-2 junction box as part of the system abandonment. The site is located in UL/B, Sec. 5, T18S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 70 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 30x30x12-ft deep excavation. The excavated soil was blended on site and representative composite samples of the excavation bottom, the excavation walls, and the backfill were sent to a commercial for analysis of chloride and TPH, resulting in a 4-WALL chloride concentration of 212 mg/kg, a gasoline range organics (GRO) concentration of 70.4 mg/kg, and a diesel range organics (DRO) concentration of 707.7 mg/kg. The bottom composite resulted in a chloride concentration of 108 mg/kg, a gasoline range organics (GRO) concentration of 10.6 mg/kg, and a diesel range organics (DRO) concentration of 59.5 mg/kg. The backfill resulted in a chloride concentration of 88.4 mg/kg, a gasoline range organics (GRO) concentration of 60.0 mg/kg, and a diesel range organics (DRO) concentration of 366.3 mg/kg. Chloride concentrations were low and TPH concentrations were within NMOC guidelines. The blended backfill was returned to the excavation. Clean, imported soil was used as a top cap and to contour the site to the surrounding area. On 4/25/2006, 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 long horizontal flourish extending to the right.

Hack Conder
Environmental Manager

enclosures

RICE OPERATING COMPANY JUNCTION BOX FINAL REPORT

BOX LOCATION							BOX DIMENSIONS - FEET		
SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	Length	Width	Depth
Vacuum	Jct. B-5-2	B	5	18S	35E	Lea	no box; system abandonment		

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

Depth to Groundwater 70 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 3/10/2006 Date Completed 4/21/2006 OCD Witness no

Soil Excavated 400.0 cubic yards Excavation Length 30 Width 30 Depth 12 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 3/20/2006 Sample Depth 12 ft

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.		70.4	707.7	212
BOTTOM COMP.	21.3	10.6	59.5	108
BACKFILL		60.0	366.3	88.4

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
bottom comp.	12'	239
vertical delineation trench 15 ft south of junction (source)	1'	59
	2'	58
	3'	86
	4'	86
	5'	86
	6'	59
	7'	88
	8'	88
	9'	61
	10'	59
	11'	90
	12'	59

General Description of Remedial Action: This junction was addressed as part of the Vacuum SWD system abandonment. After the box lumber was removed, an investigation was conducted using a backhoe to collect soil samples at regular intervals producing a 30x30x12-ft deep hole. Chloride field tests were performed on each sample, which yield generally low concentrations of chloride. Organic vapors were also measured using a PID. Representative composite samples were sent to a commercial laboratory for analysis. The excavated soil was then blended on-site and returned to the excavation and 24 yards of clean, imported top soil were used to top cap the site and contour to the surrounding area. On 4/25/2006, 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, chloride graph

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

REPORT ASSEMBLED BY Katie Jones INITIAL KJ

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE Larry Bruce Baker Jr. DATE 7-28-08

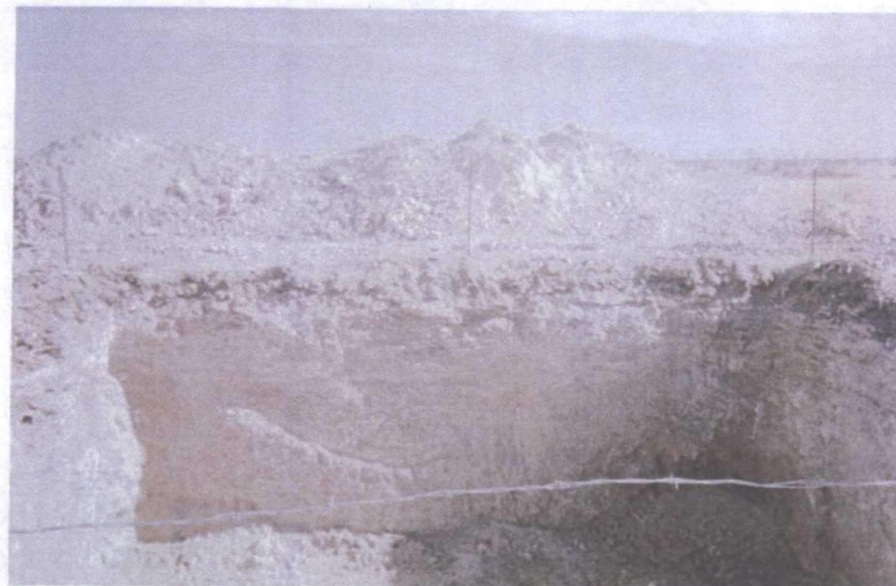
Vacuum Jct. B-2-1

Unit B, Section 5, T18S, R35E



trackhoe delineation

3/15/2006



excavation, facing south

3/16/2006



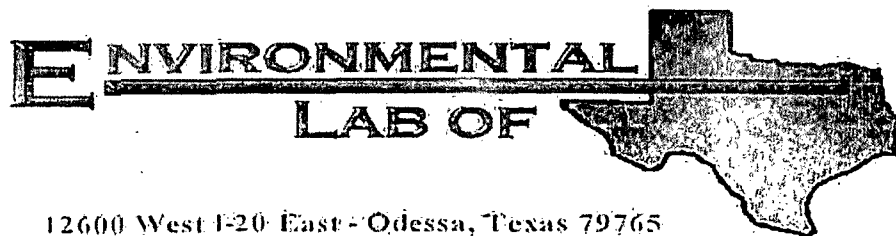
backfilling excavation site, facing north

3/30/2006



seeding backfilled site

4/25/2006



FINAL

30' x 30' x 12'

12600 West I-20 East - Odessa, Texas 79765

Analytical Report

Prepared for:

Roy Rascon
Rice Operating Co.
122 W. Taylor
Hobbs, NM 88240

COPY

Project: Vacuum Jct. B-5-2
Project Number: None Given
Location: None Given

Lab Order Number: 6C21001

Report Date: 03/24/06

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: Vacuum Jct. B-5-2
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
03/24/06 11:15

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
4' Wall Comp. 30'X30'X12' BGS	6C21001-01	Soil	03/20/06 11:44	03/21/06 07:45
Bottom Comp. @ 12' BGS	6C21001-02	Soil	03/20/06 12:00	03/21/06 07:45
Blended soil for Backfill	6C21001-03	Soil	03/20/06 12:10	03/21/06 07:45

COPY

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: Vacuum Jet. B-5-2
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
03/24/06 11:15

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
4 Wall Comp. 30"X30"X12' BGS (6C21001-01) Soil									
Carbon Ranges C6-C12	70.4	10.0	mg/kg dry	1	EC62215	03/22/06	03/23/06	EPA 8015M	
Carbon Ranges C12-C28	608	10.0	"	"	"	"	"	"	
Carbon Ranges C28-C35	99.7	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	778	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		98.8 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		101 %	70-130		"	"	"	"	
Bottom Comp. @ 12" BGS (6C21001-02) Soil									
Carbon Ranges C6-C12	10.6	10.0	mg/kg dry	1	EC62215	03/22/06	03/23/06	EPA 8015M	
Carbon Ranges C12-C28	59.5	10.0	"	"	"	"	"	"	
Carbon Ranges C28-C35	J [5.81]	10.0	"	"	"	"	"	"	J
Total Hydrocarbon C6-C35	70.1	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		91.4 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		92.6 %	70-130		"	"	"	"	
Blended soil for Backfill (6C21001-03) Soil									
Carbon Ranges C6-C12	60.0	10.0	mg/kg dry	1	EC62215	03/22/06	03/23/06	EPA 8015M	
Carbon Ranges C12-C28	324	10.0	"	"	"	"	"	"	
Carbon Ranges C28-C35	42.3	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	426	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		101 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		101 %	70-130		"	"	"	"	

COPY

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: Vacuum Jet, B-5-2
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
03/24/06 11:15

General Chemistry Parameters by EPA / Standard Methods
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
4 Wall Comp. 30'X30'X12' BGS (6C21001-01) Soil									
Chloride	212	10.0	mg/kg	20	EC62303	03/23/06	03/23/06	EPA 300.0	
% Moisture	9.8	0.1	%	1	EC62202	03/21/06	03/22/06	% calculation	
Bottom Comp. @ 12' BGS (6C21001-02) Soil									
Chloride	108	10.0	mg/kg	20	EC62303	03/23/06	03/23/06	EPA 300.0	
% Moisture	10.0	0.1	%	1	EC62202	03/21/06	03/22/06	% calculation	
Blended soil for Backfill (6C21001-03) Soil									
Chloride	88.4	10.0	mg/kg	20	EC62303	03/23/06	03/23/06	EPA 300.0	
% Moisture	11.1	0.1	%	1	EC62202	03/21/06	03/22/06	% calculation	

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Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: Vacuum Jet. B-5-2
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
03/24/06 11:15

Organics by GC - Quality Control Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EC62215 - Solvent Extraction (GC)										
Blank (EC62215-BLK1)										
					Prepared: 03/22/06 Analyzed: 03/23/06					
Carbon Ranges C6-C12	ND	10.0	mg/kg wet							
Carbon Ranges C12-C28	ND	10.0	"							
Carbon Ranges C28-C35	ND	10.0	"							
Total Hydrocarbon C6-C35	ND	10.0	"							
Surrogate: 1-Chlorooctane	44.8		mg/kg	50.0		89.6	70-130			
Surrogate: 1-Chlorooctadecane	46.3		"	50.0		92.6	70-130			
LCS (EC62215-BS1)										
					Prepared: 03/22/06 Analyzed: 03/23/06					
Carbon Ranges C6-C12	498	10.0	mg/kg wet	500		99.6	75-125			
Carbon Ranges C12-C28	505	10.0	"	500		101	75-125			
Total Hydrocarbon C6-C35	1000	10.0	"	1000		100	75-125			
Surrogate: 1-Chlorooctane	52.9		mg/kg	50.0		106	70-130			
Surrogate: 1-Chlorooctadecane	49.8		"	50.0		99.6	70-130			
Calibration Check (EC62215-CCV1)										
					Prepared: 03/22/06 Analyzed: 03/23/06					
Carbon Ranges C6-C12	284		mg/kg	250		114	80-120			
Carbon Ranges C12-C28	299		"	250		120	80-120			
Total Hydrocarbon C6-C35	583		"	500		117	80-120			
Surrogate: 1-Chlorooctane	58.4		"	50.0		117	70-130			
Surrogate: 1-Chlorooctadecane	52.2		"	50.0		114	70-130			
Matrix Spike (EC62215-MS1)										
			Source: 6C21001-02		Prepared: 03/22/06 Analyzed: 03/24/06					
Carbon Ranges C6-C12	445	10.0	mg/kg dry	556	10.6	78.1	75-125			
Carbon Ranges C12-C28	500	10.0	"	556	59.5	79.2	75-125			
Carbon Ranges C28-C35	660	10.0	"	1000	5.81		75-125			
Total Hydrocarbon C6-C35	945	10.0	"	1110	70.1	78.8	75-125			
Surrogate: 1-Chlorooctane	46.9		mg/kg	50.0		93.8	70-130			
Surrogate: 1-Chlorooctadecane	35.1		"	50.0		70.2	70-130			

COPY

Rice Operating Co.
122 W. Taylor
Hobbs, NM, 88240

Project: Vacuum Jet B-5-2
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
03/24/06 11:15

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EC62215 - Solvent Extraction (GC)										
Matrix Spike Dup (EC62215-MSD1)		Source: 6C21001-02		Prepared: 03/22/06		Analyzed: 03/24/06				
Carbon Ranges C6-C12	454	10.0	mg/kg dry	556	10.6	79.7	75-125	2.00	20	
Carbon Ranges C12-C28	501	10.0	"	556	59.5	79.4	75-125	0.200	20	
Carbon Ranges C28-C35	7.43	10.0	"	0.00	5.81		75-125	1.18	20	J
Total Hydrocarbon C6-C35	955	10.0	"	1110	70.1	79.7	75-125	1.05	20	
Surrogate: 1-Chlorooctane	47.2		mg/kg	50.0		94.4	70-130			
Surrogate: 1-Chlorodecane	35.2		"	50.0		70.4	70-130			

COPY

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: Vacuum Jet B-5-2
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
03/24/06 11:15

General Chemistry Parameters by EPA / Standard Methods - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EC62202 - General Preparation (Prep)										
Blank (EC62202-BLK1)										
					Prepared: 03/21/06 Analyzed: 03/22/06					
% Solids	100		%							
Duplicate (EC62202-DUP1)										
Source: 6C20011-01					Prepared: 03/21/06 Analyzed: 03/22/06					
% Solids	94.6		%		98.6			4.14	20	
Duplicate (EC62202-DUP2)										
Source: 6C21004-01					Prepared: 03/21/06 Analyzed: 03/22/06					
% Solids	93.6		%		94.0			0.426	20	
Duplicate (EC62202-DUP3)										
Source: 6C21009-01					Prepared: 03/21/06 Analyzed: 03/22/06					
% Solids	84.6		%		84.6			0.00	20	
Batch EC62303 - Water Extraction										
Blank (EC62303-BLK1)										
					Prepared & Analyzed: 03/23/06					
Chloride	0.431	0.500	mg/kg							
LCS (EC62303-BS1)										
					Prepared & Analyzed: 03/23/06					
Chloride	9.21		mg/L	10.0		92.1	80-120			
Calibration Check (EC62303-CCV1)										
					Prepared & Analyzed: 03/23/06					
Chloride	9.11		mg/L	10.0		91.1	80-120			
Duplicate (EC62303-DUP1)										
Source: 6C21001-01					Prepared & Analyzed: 03/23/06					
Chloride	222	10.0	mg/kg		212			4.61	20	

COPY

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: Vacuum Jct. B-5-2
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
03/24/06 11:15

Notes and Definitions

J Detected but below the Reporting Limit; therefore, result is an estimated concentration (CLP J-Flag).
DET Analyte DETECTED
ND Analyte NOT DETECTED at or above the reporting limit
NR Not Reported
dry Sample results reported on a dry weight basis
RPD Relative Percent Difference
LCS Laboratory Control Spike
MS Matrix Spike
Dup Duplicate

COPY

Report Approved By:

Roland K. Tuttle

Date:

3-24-06

Roland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer

Jeanne Mc Murrey, Inorg. Tech Director
LaTasha Cornish, Chemist
Sandra Sanchez, Lab Tech.

This material is intended only for the use of the individual(s) or entity to whom it is addressed, and may contain information that is privileged and confidential.

If you have received this material in error, please notify us immediately at 432-563-1800.

Environmental Lab of Texas

The results in this report apply to the samples analyzed in accordance with the samples received in the laboratory. This analytical report must be reproduced in its entirety, with written approval of Environmental Lab of Texas.

Page 7 of 7

12600 West 1-20 East
Odessa, Texas 79763

Phone: 915-563-1800
Fax: 915-563-1713

COPY

Project Name: VAC. JCT B-5-2

Project Manager: Kelli K. KASCOM

Company Name: Rice Oper Co.

Company Address: 122 W. TAYLOR

City/State/Zip: HOBB, NM 87401

Telephone No: 505-393-4174

Fax Nö:

Sampler Signature: *Robert W. Hansen*

Project #:

Project Loc:

PO #:

[illegible]

Environmental Lab of Texas
Variance / Corrective Action Report – Sample Log-In

Client: Rice Op.

Date/Time: 3/21/06 7:45

Order #: 6021001

Initials: CR

COPY

Sample Receipt Checklist

	Yes	No	O.D	C
Temperature of container/cooler?	☒	☐		
Shipping container/cooler in good condition?	☒	☐		
Custody Seals intact on shipping container/cooler?	☒	☐	Not present	
Custody Seals intact on sample bottles?	☒	☐	Not present	
Chain of custody present?	☒	☐		
Sample Instructions complete on Chain of Custody?	☒	☐		
Chain of Custody signed when relinquished and received?	☒	☐		
Chain of custody agrees with sample label(s)	☒	☐		
Container labels legible and intact?	☒	☐		
Sample Matrix and properties same as on chain of custody?	☒	☐		
Samples in proper container/bottle?	☒	☐		
Samples properly preserved?	☒	☐		
Sample bottles intact?	☒	☐		
Preservations documented on Chain of Custody?	☒	☐		
Containers documented on Chain of Custody?	☒	☐		
Sufficient sample amount for indicated test?	☒	☐		
All samples received within sufficient hold time?	☒	☐		
VOC samples have zero headspace?	☒	☐	Not Applicable	

Other observations:

Variance Documentation:

Contact Person: _____ Date/Time: _____ Contacted by: _____

Regarding:

Corrective Action Taken:

122 WEST TAYLOR
HOBBS, NEW MEXICO 88240
PHONE: (505) 393-9174 FAX: (505) 397-1471
VOC FIELD TEST REPORT FORM
MINI RAE PLUS CLASSIC PHOTOIONIZATION GAS DETECTOR

MODEL NO: PGM 761S
CALIBRATION GAS
GAS COMPOSITION: ISOBUTYLENE
AIR
LOT NO: 05-2859
EXP. DATE: 1-19-07
METER READING
ACCURACY: 99.9

SERIAL NO: 104412

100 PPM
BALANCE
FILL DATE: 7-19-05
ACCURACY: -1.2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
VAC	Jet B 8-2	B	5	18S	35E

5 Point Comp.

SAMPLE	PID RESULT	SAMPLE	PID RESULT
Bottom 5 Point Comp	39.4		
North Wall 5 Point Comp	175		
South Wall 5 Point Comp	13.3		
East Wall 5 Point Comp	36.9		
West Wall 5 Point Comp	16.3		
4 Wall Comp	205		

I certify that I have calibrated the above instrument in accordance to the manufacturer's operation manual.

Robert M. [Signature]
Signature

7-16-06
Date

Hansen, Edward J., EMNRD

From: Laura Pena <lpena@riceswd.com>
Sent: Monday, May 21, 2012 8:16 AM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder; Katie Jones
Subject: Vacuum Jct. B-5-2 (1R425-48) Photo Documentation
Attachments: Vacuum Jct. B-5-2 (1R425-48) Photo Documentation.pdf

Mr. Hansen,

Attached is the photo documentation for the Vacuum Jct. B-5-2 (1R425-48) site as requested.

If you have any questions, please contact Hack Conder at (575)631-6432.

Thank you,
Laura Peña

Vacuum Jct. B-5-2 (1R425-48)
Unit B, Section 5, T18S, R35E



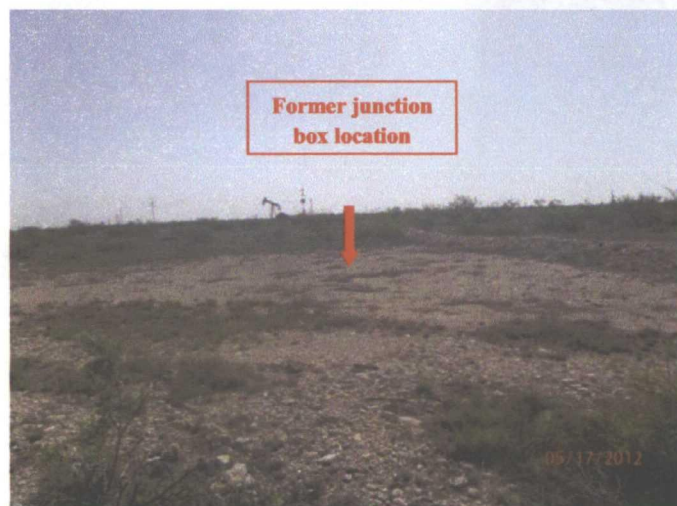
Facing north

9/13/2005



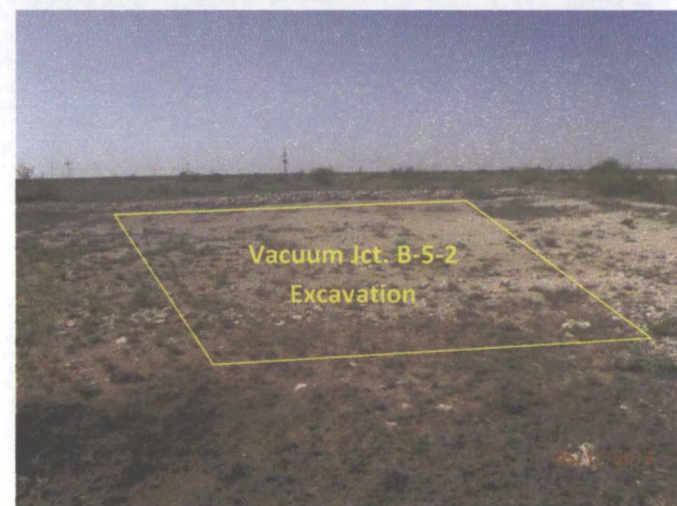
Facing south

4/21/2006



Facing north

5/17/2012



Facing south

5/17/2012