

1R - 425-56

**APPROVALS**

**YEAR(S):**

2012

**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Monday, June 11, 2012 4:06 PM  
**To:** Hack Conder (hconder@riceswd.com)  
**Cc:** Leking, Geoffrey R, EMNRD; Laura Pena (lpena@riceswd.com); Scott Curtis (scurtis@riceswd.com)  
**Subject:** Remediation Plan (1R425-56) Termination - ROC Vacuum Jct N-33-1 Site

**RE: Termination Request  
for the Rice Operating Company's  
Vacuum Jct N-33-1 Site  
Unit Letter N, Section 33, T17S, R35E, NMPM, Lea County, New Mexico  
Remediation Plan (1R425-56) 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 25, 2012 (received June 7, 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 (1R425-56) 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

RECEIVED

JUN - 7 2012

**RICE** *Operating Company*

122 West Taylor • Hobbs, New Mexico 88240  
Phone: (575) 393-9174 • Fax: (575) 397-1471

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

May 25, 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

RE: Termination Request  
Vacuum Jct. N-33-1 (1R425-56): UL/N, Sec. 33, 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 N-33-1 junction box as part of the system abandonment. The site is located in UL/N, Sec. 33, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 60 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x3x13-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 13-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 16 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. Clean, imported soil was used to backfill the excavation to ground surface and to contour the site to the surrounding area. On 5/22/2008, 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, flowing script.

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	Jct. N-33-1	N	33	17S	35E	Lea	Length	Width	Depth
							no box, system abandonment		

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

Depth to Groundwater 60 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 2/12/2008 Date Completed 5/22/2008 OCD Witness no

Soil Excavated 7 cubic yards Excavation Length 5 Width 3 Depth 13 feet

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

**FINAL ANALYTICAL RESULTS:** Sample Date 5/6/2008 Sample Depth 13 ft

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

**CHLORIDE FIELD TESTS**

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
SOURCE 13' GRAB	0.0	<10.0	<10.0	16

LOCATION	DEPTH	mg/kg
background	6"	219
vertical delineation trench at the junction (source)	8"	48
	9"	63
	10'	84
	11'	81
	12'	71
	13'	115

**General Description of Remedial Action:** This junction was eliminated during the Vacuum SWD system abandonment. After the former junction box was removed, an investigation was conducted using a backhoe to collect soil samples at regular intervals producing a 5x3x12-ft-deep excavation. Field data suggests the site is low in chloride and organic vapors, similar to that of the background. The deepest sample, 13 ft BGS, was sent to a commercial laboratory for analysis of chloride and TPH, which confirmed low concentrations. Clean soil was imported and used to backfill the excavation to ground surface and to contour the site to the surrounding area. On 5/22/2008, 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 field screening

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 12-08-08

## Vacuum Jct. N-33-1

Unit N, Section 33, T17S, R35E



undisturbed junction box

11/4/2005



delineation trench at former junction site

5/6/2008



backfilled excavation

5/22/2008



seeding backfilled site

5/22/2008



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

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

COPY

Receiving Date: 05/07/08  
Reporting Date: 05/08/08  
Project Owner: NOT GIVEN  
Project Name: VAC JCT N-33-1  
Project Location: NOT GIVEN

Sampling Date: 05/06/08  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: ML  
Analyzed By: CK/KS

LAB NUMBER	SAMPLE ID	GRO (C <sub>5</sub> -C <sub>10</sub> ) (mg/kg)	DRO (>C <sub>10</sub> -C <sub>28</sub> ) (mg/kg)	CI* (mg/kg)
ANALYSIS DATE		05/07/08	05/07/08	05/07/08
H14757-1	VERT B @ SOURCE @ 13' BGS	<10.0	<10.0	16
Quality Control		625	490	500
True Value QC		500	500	500
% Recovery		125	98.0	100
Relative Percent Difference		5.3	5.0	4.1

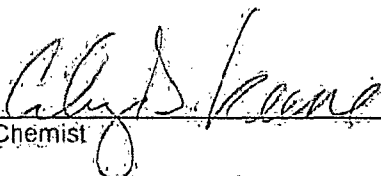
METHODS: TPH GRO & DRO: EPA SW-846.8015 M; CI: Std. Methods 4500-CIB

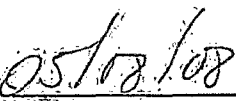
\*Analysis performed on a 1:4 w/v aqueous extract.

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MAY 12 2008

RICE OPERATING  
HOBBS, NM

  
Chemist

  
Date

H14757TCL RICE

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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

COPY

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: RICE OPERATING CO.										BILL TO		ANALYSIS REQUEST															
Project Manager: ROY R. RASCON										P.O. #:																	
Address: 122 WEST TAYLOR										Company:																	
City: HOBBS State: NM Zip: 88240										Attn:																	
Phone #: (505) 393-9174 Fax #: (505) 397-1471										Address:																	
Project #: Project Owner:										City:																	
Project Name: VAC JCT N-33-1										State: Zip:																	
Project Location:										Phone #:																	
Sampler Name: ROY R. RASCON										Fax #:																	
FOR LAB USE ONLY LAB ID #		SAMPLE I.D.		(G) LAB OR (C) COMP.	# CONTAINERS	MATRIX						PRESERV		SAMPLING		TPH 8015 M	CL										
						GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER	ACID/BASE	ICE/COOL	OTHER	DATE											TIME	
H14757-1		vert B @ source @ 13' bgs.		G	1				X					X		5/6/2008	1230									X	X

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Relinquished By:		Date: 5-7-08	Received By:	Phone Result: Yes No	Add'l Phone #:
Roy R. Rascon		Time: 0.750	[Signature]	Fax Result: X Yes No	Add'l Fax #:
Relinquished By:		Date:	Received By:	REMARKS: PLEASE E-MAIL TO jpurvis & rrascon@riceswd.com	
		Time:			
Delivered By: (Circle One)			Sample Condition	CHECKED BY:	
<input checked="" type="radio"/> UPS - <input type="radio"/> Bus - <input type="radio"/> Other:			Cool Intact <input checked="" type="radio"/> Yes <input type="radio"/> No	(Initials) [Signature]	

\* 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

MODEL: PGM 7600

MODEL: PGM 7600

MODEL: PGM 7600

SERIAL NO: 110-013676

SERIAL NO: 110-013744

SERIAL NO: 110-012383

SERIAL NO: 110-012920

COPY

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	N-33-1	N	33	17S	35E

SAMPLE ID	PID	SAMPLE ID	PID
13'	0		

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

SIGNATURE:

DATE: 5-6-08