

1R - 425-71

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, July 11, 2012 2:44 PM
To: Hack Conder (hconder@riceswd.com)
Cc: Leking, Geoffrey R, EMNRD; Laura Pena (lpena@riceswd.com); Lara Weinheimer (lweinheimer@rice-ecs.com); Scott Curtis (scurtis@riceswd.com)
Subject: Remediation Plan (1R425-71) Termination - ROC Vacuum Marathon McAlister EOL Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum Marathon McAlister EOL Site
Unit Letter M, Section 25, T17S, R34E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-71) 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 June 1, 2012 (received June 7, 2012) and additional photo-documentation received June 22, 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 (1R425-71) 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

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8593

June 1, 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 Marathon McAlister EOL (1R425-71): UL/M, Sec. 25, T17S, R34E
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 2005, ROC initiated work on the former Marathon McAlister EOL junction box as part of the system abandonment. The site is located in UL/M, Sec. 25, T17S, R34E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 95 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x3x15-ft deep excavation. The site could not be excavated any large due to site being located near a battery and a lease road. Chloride field tests were performed on each sample which yielded some elevated concentrations. Organic vapors were measured using a PID, which yielded low concentrations. 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 5/29/2008, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

To further investigate the depth of chloride presence, a soil bore was initiated on 2/9/2009 at the former junction box site. The boring was advanced to 30 ft BGS with soil samples collected every 5 ft. The 20 and 30 ft samples were sent for laboratory analysis, resulting in a chloride concentration of 352 mg/kg and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits at 20 ft BGS. The 30 ft sample resulted in a chloride concentration of 272 mg/kg, a GRO concentration below detectable limits, and a DRO concentration of 31.5 mg/kg. The junction box final report, photo documentation, laboratory analysis, PID sheet and boring log 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 | Marathon McAlister EOL | M | 25 | 17S | 34E | Lea | Length | Width | Depth |
| | | | | | | | eliminated | | |

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

Depth to Groundwater: 95 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started: 9/8/2005 Date Completed: 2/9/2009 OCD Witness: no

Soil Excavated: 8.3 cubic yards Excavation Length: 5 Width: 3 Depth: 15 feet

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

FINAL ANALYTICAL RESULTS: Sample Date: 2/9/2009 Sample Depth: 20 ft, 30 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 |
|----------------------|-----------------|-----------|-----------|----------------|
| SOIL BORING #1 @ 20' | 0.0 | <10.0 | <10.0 | 352 |
| SOIL BORING #1 @ 30' | 0.0 | <10.0 | 31.5 | 272 |

| LOCATION | DEPTH | mg/kg |
|--|-------|-------|
| vertical delineation trench at the junction (source) | 3' | 269 |
| | 4' | 369 |
| | 5' | 381 |
| | 6' | 680 |
| | 7' | 982 |
| | 8' | 855 |
| | 9' | 765 |
| | 10' | 799 |
| | 11' | 598 |
| | 12' | 766 |
| | 13' | 1455 |
| | 13' | 1654 |
| | 14' | 1783 |
| | 15' | 660 |
| SOIL BORING at the junction (2/9/2009) | 15' | 282 |
| | 20' | 363 |
| | 25' | 336 |
| | 30' | 279 |

General Description of Remedial Action: This junction was addressed during the Vacuum SWD System abandonment. The former junction box was investigated using a backhoe to collect soil samples at regular intervals. The overall junction box excavation had dimensions of 5x3x15-ft deep. The site could not be excavated any larger due to the location being near a battery and a lease road. Chloride field tests were performed on each sample which yielded elevated concentrations. Organic vapors were measured using a PID which yielded low concentrations. The excavated soil was returned to the excavation and clean, imported soil was used fill the excavation to ground surface and to contour the site to the surrounding area. On 5/29/2008, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate. To further investigate depth of chloride presence, a soil boring was initiated on 2/9/2009 at the former junction box site. The boring was advanced to 30 ft BGS while soil samples were collected every 5 ft and field tested for chloride and organic vapors. The field tests yielded low concentrations of both. The 20' and 30' ft samples were analyzed by a commercial laboratory for chloride and TPH which confirmed low concentrations. The entire bore hole was plugged with bentonite to the ground surface.

enclosures: photos, lab results, PID (field) screenings, boring log, 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: 10-15-09

Vacuum Marathon McAlister EOL

Unit M, Section 25, T17S, R34E



excavation at the former junction box

5/28/2008



backfilling the excavation

5/28/2008



seeding the backfilled site

5/29/2008



soil boring the former junction box site

2/9/2009



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 OPERATING</u> | | BILL TO | | ANALYSIS REQUEST | | | | | | | | | | | | | | | | | | | | |
| Project Manager: <u>HACK CONDEZ</u> | | P.O. #: | | <div style="position: relative; height: 200px;"> <div style="position: absolute; top: 50%; left: 50%; transform: translate(-50%, -50%); font-size: 100px; opacity: 0.5;">COPY</div> </div> | | | | | | | | | | | | | | | | | | | | |
| 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>393-1471</u> | | Address: | | | | | | | | | | | | | | | | | | | | | | |
| Project #: _____ Project Owner: _____ | | City: | | | | | | | | | | | | | | | | | | | | | | |
| Project Name: <u>VACUUM MARATHON MAJESTY</u> | | State: _____ Zip: _____ | | | | | | | | | | | | | | | | | | | | | | |
| Project Location: _____ | | Phone #: _____ | | | | | | | | | | | | | | | | | | | | | | |
| Sampler Name: <u>TONY GRIECO</u> | | Fax #: _____ | | | | | | | | | | | | | | | | | | | | | | |
| FOR LAB USE ONLY | | | | | | | | | | | | | | | | | | | | | | | | |
| Lab I.D. | Sample I.D. | GRAB OR COMP. | # CONTAINERS | MATRIX | | | | PRESERV | | SAMPLING | | | | | | | | | | | | | | |
| | | | | GROUNDWATER | WASTEWATER | SOIL | OIL | SLUDGE | OTHER | ACID/BASE | ICE/COOL | OTHER | DATE | TIME | | | | | | | | | | |
| <u>416863-1</u> | <u>SB#1 20'</u> | <u>G</u> | <u>1</u> | | | | | | | | | | <u>2/9/09</u> | <u>9:10</u> | | | | | | | | | | |
| <u>-2</u> | <u>SB#2 30'</u> | <u>G</u> | <u>1</u> | | | | | | | | | | <u>2/9/09</u> | <u>9:14</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 services. 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>[Signature]</u> | Date: _____ | Received By: <u>[Signature]</u> | Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No | Add'l Phone #: |
| | Time: _____ | <u>2/10/09 7:45 AM</u> | Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No | Add'l Fax #: |
| Relinquished By: | Date: | Received By: | REMARKS: | |
| | Time: | | <u>email results</u> <u>lweinhammer@riceswd.com</u> <u>heweler@riceswd.com</u> <u>j.purvis@riceswd.com</u> | |
| Delivered By: (Circle One) | Sample Condition | Checked By: | | |
| <u>Sample - UPS - Bus - Other:</u> | Cool Intact <input type="checkbox"/> Yes <input type="checkbox"/> No | (Initials) | | |

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

| | | | | |
|----------------|-------------|----------------|------------------------|---|
| Logger: | Tony Grieco | Client: | RICE Operating Company | Well ID: |
|----------------|-------------|----------------|------------------------|---|

| Depth (feet) | chloride field tests | PID | Description | Lithology | Soil Bore Construction |
|-----------------|-------------------------|-----|---|-----------|---------------------------|
| 15 | 282 | 0 | 15 - 30 ft VERY FINE TO FINE SAND dry | | bentonite seal |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| 20 | 363 | 0 | | | |
| Lab Cl- | 352 | | | | |
| DRO | | | | | |
| GRO | <10/<10 | | | | |
| 25 | 336 | 0 | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| 30 | 279 | 0 | | | |
| Lab Cl- | 272 | | | | |
| DRO | | | | | |
| GRO | 31.5/<10 | | | | |

RICE OPERATING COMPANY

122 West Taylor ~ Hobbs, NM 88240

PHONE: (575) 393-9174 FAX: (575) 397-1471

PID METER CALIBRATION & FIELD REPORT FORM

CK
MODEL
NO.

| |
|---|
| |
| ✓ |
| |
| |

MODEL: PGM 7300

SERIAL NO: 590-000183

MODEL: PGM 7300

SERIAL NO: 590-000504

MODEL: PGM 7600

SERIAL NO: 110-12383

MODEL: PGM 7600

SERIAL NO: 110-02920

COPY

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

| | |
|------------|-------------------------------|
| LOT NO: | EXPIRATION DATE: 9-11-09 |
| FILL DATE: | METER READING ACCURACY: 100.0 |

ACCURACY: +/- 2%

| SYSTEM | SITE | UNIT | SECTION | TOWNSHIP | RANGE |
|--------|----------------------|------|---------|----------|-------|
| Vacuum | Marathon McCullister | M | 25 | T17S | R34E |

SAMPLE ID:

SB #1

| DEPTH | PID |
|-------|-----|
| 15' | 0 |
| 20' | 0 |
| 25' | 0 |
| 30' | 0 |

| DEPTH | PID |
|-------|-----|
| | |
| | |
| | |
| | |

| DEPTH | PID |
|-------|-----|
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| DEPTH | PID |
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| DEPTH | PID |
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| DEPTH | PID |
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| DEPTH | PID |
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| | |
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| | |

| DEPTH | PID |
|-------|-----|
| | |
| | |
| | |
| | |

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

Signature

[Signature]

Date

2-9-09

SITE MAP

Lot # 1 Fill date not available since the
gas was provided as part of the new PID.
meth.

N ↑

RICE OPERATING COMPANY

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

COF

MODEL NO: PGM 761S SERIAL #104412

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

| | |
|-------------------|-------------------------------|
| LOT NO: 04-2747 | EXPIRATION DATE: 6-1-06 |
| FILL DATE: 2-1-05 | METER READING ACCURACY: 100.5 |

ACCURACY: +/- 2%

| SYSTEM | JUNCTION | UNIT | SECTION | TOWN SHIP | RANGE |
|--------|----------------------------|------|---------|-----------|-------|
| VAC | MARATHON McCALISTER EOL | M | 25 | 17S | 34E |

| SAMPLE ID | PID | SAMPLE ID | PID |
|-----------|------|-----------|-----|
| 1' | | 13' | 0 |
| 2' | | | |
| 3' | 46 | | |
| 4' | 0.01 | | |
| 5' | 0.01 | | |
| 6' | 0.01 | | |
| 7' | 0.01 | | |
| 8' | 0.01 | | |
| 9' | 0.01 | | |
| 10' | 0.01 | | |
| 11' | 0.01 | | |
| 12' | 0.01 | | |

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

SIGNATURE:

Loy R. Ross

DATE: 9-8-05

RICE OPERATING COMPANY

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

COPY

MODEL: PGM 7600 SERIAL # 110-013744

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 | MARATHON McCALISTER EOL | M | 25 | 17S | 35E |

| SAMPLE ID | PID | SAMPLE ID | PID |
|---------------------|-----|-----------|-----|
| VERT @ SOURCE @ 13' | 0 | | |
| 14' | 0 | | |
| 15' | 0 | | |

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

SIGNATURE:

Ray R. Rascon

DATE: 5-22-08

Hansen, Edward J., EMNRD

From: Laura Pena <lpena@riceswd.com>
Sent: Friday, June 22, 2012 3:48 PM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder
Subject: ROC - Vacuum Marathon McAlister EOL (1R425-71) Photo Documentation
Attachments: Vacuum Marathon McAlister EOL (1R425-71) Photo Documentation.pdf

Mr. Hansen,

Attached is the photo documentation for the Vacuum Marathon McAlister EOL (1R425-71) site as requested.

Let Hack Conder or me know if you have any questions or require any additional information.

Thank you,

Laura Peña
Environmental Project Scientist
RICE Operating Company

Vacuum Marathon McAlister EOL (1R425-71)
Unit M, Section 25, T17S, R35E



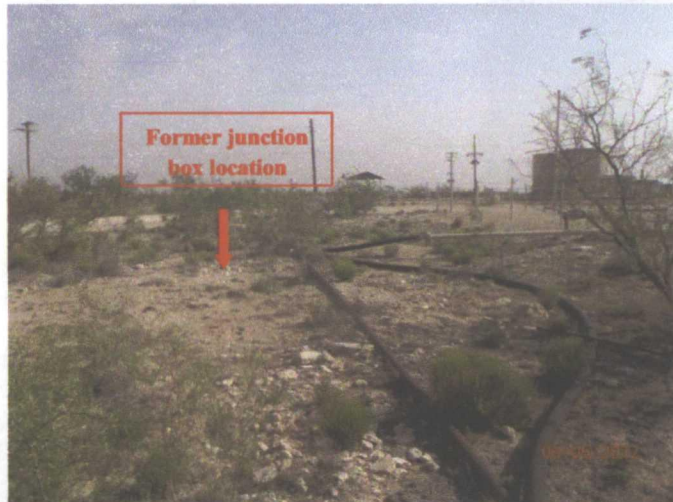
Facing north

6/9/2005



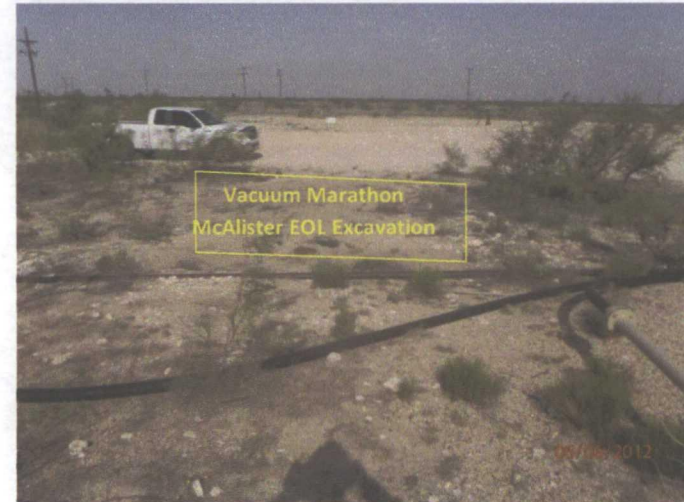
Facing west

9/8/2005



Facing north

6/6/2012



Facing west

6/6/2012