

1R - 425-77

**APPROVALS**

**YEAR(S):**

2012

**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Monday, July 16, 2012 1:28 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 (1R425-77) Termination - ROC Vacuum Jct A-31 Site

**RE: Termination Request  
for the Rice Operating Company's  
Vacuum Jct A-31 Site  
Unit Letter A, Section 31, T17S, R35E, NMPM, Lea County, New Mexico  
Remediation Plan (1R425-77) 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 8, 2012 (received June 12, 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 (1R425-77) 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 OGD

2012 JUN 12 P 12:43

## **RICE** *Operating Company*

122 West Taylor • Hobbs, New Mexico 88240

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

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8593

June 8, 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. A-31 (1R425-77): UL/A, Sec. 31, 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 2009, ROC initiated work on the former A-31 junction box as part of the system abandonment. The site is located in UL/A, Sec. 31, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 117 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 3x7x9-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 16 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area. On 4/13/2009, 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

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Vacuum	Jct. A-31	A	31	17S	35E	Lea	Length	Width	Depth
							eliminated		

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

Depth to Groundwater 117 feet NMOC SITE ASSESSMENT RANKING SCORE: 0

Date Started 2/23/2009 Date Completed 4/8/2009 OCD Witness no

Soil Excavated 7.0 cubic yards Excavation Length 3 Width 7 Depth 9 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 2/23/2009 Sample Depth 9 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	Chloride mg/kg
SOURCE 9' GRAB	1.8	<10.0	<10.0	16

LOCATION	DEPTH	mg/kg
background	6"	143
vertical delineation trench at the junction (source)	5'	232
	6'	145
	7'	244
	8'	225
	9'	206

**General Description of Remedial Action:** This junction box was addressed during the

Vacuum SWD System Abandonment. An investigation was conducted at the former

junction box site using a backhoe to collect soil samples at regular intervals creating a

3x7x9-ft deep excavation. Chloride field tests were performed on each sample which

yielded low concentrations similar to that of the background sample. Organic vapors were

measured using a PID which also yielded low concentrations. The deepest sample, 9 ft BGS, was sent to a commercial laboratory for

analysis of chloride and TPH. Laboratory analysis confirmed low concentrations of each. Clean, imported soil was used to backfill the

excavation to ground surface and to contour to the surrounding area. On 4/13/2009, 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) screenings, chloride curve

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

SITE SUPERVISOR Jordan Woodfin SIGNATURE Jordan Woodfin COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY: Katie Jones INITIAL KJ

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE Larry Bruce Baker Jr. DATE 11-6-09



## Vacuum Jct. A-31

Unit A, Section 31, T17S, R35E



former junction box

10/18/2005



excavating the former junction box site

2/23/2009



excavation at the former junction box site

2/23/2009



seeding the backfilled site

4/13/2009



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

ANALYTICAL RESULTS FOR  
RICE OPERATING COMPANY  
ATTN: JORDAN WOODFIN  
122 W. TAYLOR  
HOBBS, NM 88240

COPY

Receiving Date: 02/23/09  
Reporting Date: 02/25/09  
Project Number: NOT GIVEN  
Project Name: VACUUM JCT A-31  
Project Location: VACUUM JCT A-31

Sampling Date: 02/23/09  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: ML  
Analyzed By: AB/HM

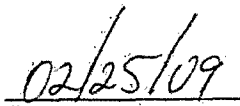
LAB NUMBER	SAMPLE ID	GRO (C <sub>6</sub> -C <sub>10</sub> ) (mg/kg)	DRO (C <sub>10</sub> -C <sub>28</sub> ) (mg/kg)	CI* (mg/kg)
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ANALYSIS DATE	02/25/09	02/25/09	02/25/09
H16955-1 SOURCE BTM GRAB @ 9 FT.	<10.0	<10.0	16
Quality Control	514	584	500
True Value QC	500	500	500
% Recovery	103	117	100
Relative Percent Difference	<0.1	4.0	< 0.1

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI: Std. Methods 4500-CFB

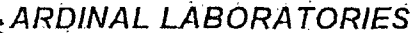
\*Analysis performed on a 1:4 w:v aqueous extract.

  
Chemist

  
Date

H16955 TCL 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. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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



# RICE OPERATING COMPANY

122 West Taylor Hobbs, NM 88240  
 PHONE: (575) 393-9174 FAX: (575) 397-1471  
 PID METER CALIBRATION & FIELD REPORT FORM

COPY

Check Model Number:

✓

Model: PGM 7300 Serial No: 590-000509  
 Model: PGM 7300 Serial No: 590-000508  
 Model: PGM 7300 Serial No: 590-000504


Model: PGM 7600 Serial No: 110-023920  
 Model: PGM 7600 Serial No: 110-013744  
 Model: PGM 7600 Serial No: 110-013676

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 08-3425	EXPIRATION DATE: 10-29-09
FILL DATE: 2-29-08	METER READING ACCURACY: 100

ACCURACY : +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
Vacuum	A-31	A	31	175	35E

Source

SAMPLE ID	PID	SAMPLE ID	PID
5'	24.8	Background	9.7
6'	7.5		
7'	7		
8'	3		
9'	1.8		

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

SIGNATURE:

*Jordan Half*

DATE: 2-23-09