

1R - 425-76

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, July 16, 2012 3:52 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 (1R425-76) Termination - ROC Vacuum Jct C-6 Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum Jct C-6 Site
Unit Letter C, Section 6, T18S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-76) 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 (1R425-76) 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 OCD

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. C-6 (1R425-76): UL/C, Sec. 6, 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 2009, ROC initiated work on the former C-6 junction box as part of the system abandonment. The site is located in UL/C, Sec. 6, T18S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 100 +/- feet. An investigation was conducted at the former junction box site using an air-rotary drilling rig to collect soil samples at regular intervals. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in low concentrations of each. The 6-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 64 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The entire bore hole was plugged with bentonite to ground surface. Clean, imported soil was used to contour the site to the surrounding area. On 6/25/2009, 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 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	Jct. C-6	C	6	18S	35E	Lea	Length	Width	Depth
							eliminated		

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

Depth to Groundwater 100 feet NMOC SITE ASSESSMENT RANKING SCORE: 10

Date Started 6/18/2009 Date Completed 6/18/2009 OCD Witness no

Soil Excavated n/a cubic yards Excavation Length n/a Width n/a Depth n/a feet

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

FINAL ANALYTICAL RESULTS: Sample Date 6/18/2009 Sample Depth 6 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
SB #1 6' GRAB	0.1	<10.0	<10.0	64

LOCATION	DEPTH	mg/kg
background	6'	153
vertical delineation at the junction (source)	2'	306
	3'	197
	4'	141
	5'	151
	6'	144

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

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

junction box site using a air-rotary drilling rig to collect soil samples at regular intervals.

Chloride field tests were performed on each sample which yielded low concentrations.

Organic vapors were measured using a PID which also yielded low concentrations. The

deepest sample, 6 ft BGS, was sent to a commercial laboratory for analysis of chloride and TPH. Lab analysis confirmed low concentrations

of each. The entire bore hole was plugged with bentonite to the ground surface. Clean, imported soil was used to backfill the former junction

box site and to contour the site to the surrounding area. On 6/25/2009, 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 11-13-09

Vacuum Jct. C-6

Unit C, Section 6, T18S, R35E



drilling SB #1 at the former junction box site

6/18/2009



collecting a soil sample

6/18/2009



plugged SB #1 with bentonite

6/18/2009



seeding backfilled site

6/25/2009



ARDINAL LABORATORIES

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

Receiving Date: 06/19/09
Reporting Date: 06/22/09
Project Number: NOT GIVEN
Project Name: VACUUM JCT C-6
Project Location: VACUUM JCT C-6

COPY

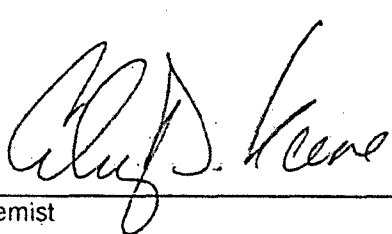
Sampling Date: 06/18/09
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: ML
Analyzed By: AB/HM

LAB NUMBER	SAMPLE ID	GRO	DRO	CI*
		(C ₆ -C ₁₀)	(>C ₁₀ -C ₂₈)	
		(mg/kg)	(mg/kg)	(mg/kg)

ANALYSIS DATE	06/20/09	06/20/09	06/19/09
H17667-1 SB #1 @ 6FT	<10.0	<10.0	64
Quality Control	514	551	500
True Value QC	500	500	500
% Recovery	103	110	100
Relative Percent Difference	4.0	5.7	<0.1

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

*Analysis performed on a 1:4 w:v aqueous extract. Reported on wet weight.


Chemist


Date

H17667 TCL RICE

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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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Relinquished By: <i>Bruce Baker</i>		Date: <i>6/19/09</i>	Received By: <i>Monty LaBart</i>		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
		Time: <i>1:18pm</i>			Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Relinquished By:		Date:	Received By:		REMARKS: <i>Email Results to BBAKER@RICESUP.com cc JPURVIS@RICESUP.com</i>	
		Time:				
Delivered By: (Circle One) Sampler - UPS - Bus - <u>Other</u>			Sample Condition Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/> Yes No Yes No	CHECKED BY: (Initials) <i>MLB</i>		

† 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

Check Model Number:

✓

Model: PGM 7300 Serial No: 590-000183
 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

COPY

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 3604	EXPIRATION DATE: 10-9-10
FILL DATE: 4-9-09	METER READING ACCURACY: 100

ACCURACY: +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
Vacuum	C-6	C	6	TIBS	R35E

SAMPLE ID	PID	SAMPLE ID	PID
2'	0.1	Background	
3'	0	6"	0
4'	0.1		
5'	0		
6'	0.1		

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

SIGNATURE

Michael Wood

DATE

6-18-09