

1R - 425-79

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, July 17, 2012 1:58 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 (1R425-79) Termination - ROC Vacuum E-29 EOL Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum E-29 EOL Site
Unit Letter E, Section 29, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-79) 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 22, 2012 (received June 28, 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 (1R425-79) 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 28 P 1:00

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 8647

June 22nd, 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 E-29 EOL (1R425-79): UL/E, Sec. 29, 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 E-29 EOL junction box as part of the system abandonment. The site is located in UL/E, Sec. 29, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 77 +/- 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 12-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 80 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The entire bore hole was filled 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 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	E-29 EOL	E	29	17S	35E	Lea	Length	Width	Depth
							eliminated		

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

Depth to Groundwater 77 feet NMOCD 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 12 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
SB #1 12' GRAB	0.3	<10.0	<10.0	80

LOCATION	DEPTH	mg/kg
background	6"	166
vertical delineation at the junction (source)	2'	121
	3'	353
	4'	557
	5'	735
	6'	933
	7'	1443
	8'	1169
	9'	1037
	10'	548
	11'	416
	12'	329

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 concentrations that decreased with depth. Organic vapors were measured using a PID which also yielded low concentrations. The deepest sample, 12 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 backfilled with bentonite to the 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.

enclosures: photos, lab results, PID (field) tests, 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 [Signature] COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Katie Jones INITIAL KJ

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE [Signature] DATE 11-3-09

Vacuum E-29 EOL

Unit E, Section 29, T17S, R35E



drilling SB #1 at the former junction box site

6/18/2009



plugging SB #1 with bentonite

6/18/2009



importing clean soil to the site

6/24/2009



seeding the backfilled site

6/25/2009



ARDINAL LABORATORIES

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

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

COPY

Receiving Date: 06/19/09
Reporting Date: 06/22/09
Project Number: NOT GIVEN
Project Name: SB#1 @ 12'
Project Location: VACUUM E 29 EOL

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 (C ₆ -C ₁₀) (mg/kg)	DRO (C ₁₀ -C ₂₈) (mg/kg)	CI* (mg/kg)
ANALYSIS DATE	06/20/09	06/20/09	06/19/09
H17672-1 SB #1 @ 12'	<10.0	<10.0	80
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.

Note: Second surrogate for the 8015M analysis was outside historical limits due to matrix interference.

Chemist

Date

H17672 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 analysis. 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.



101 East Marland, Hobbs, NM 88240

(575) 393-2326, Fax (575) 393-2476

Page of

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Sampler Relinquished By: <u>Danell M. Atche</u> Relinquished By: <u>Bruce Baker</u> Delivered By: (Circle One) <u>Other</u> Sampler - UPS - Bus - <u>Other</u>		Received By: _____ Date: _____ Time: _____ Received By: <u>Maty L. But</u> Date: <u>6/19/09</u> Time: <u>1:22pm</u> Temp. _____ Sample Condition: Cool <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Intact <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> CHECKED BY: <u>UCB</u> (Initials)		Phone Result: <input type="checkbox"/> No <input type="checkbox"/> Add'l Phone #: _____ Fax Result: <input type="checkbox"/> No <input type="checkbox"/> Add'l Fax #: _____ REMARKS: <u>RESULTS B. Baker @ Rice SWD .com</u> <u>J. Purvis @ Rice SWD .com</u>	
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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: 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	E-29 EOL	E	29	175	35E

SAMPLE ID	PID	SAMPLE ID	PID
2'	0.0	Background	
3'	0.3	6'	0
4'	0.3		
5'	0.1		
6'	0.2		
7'	0.3		
8'	0.3		
9'	0.3		
10'	0.3		
11'	0.4		
12'	0.3		

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

SIGNATURE:

Jordan Woolf

DATE:

6-13-09