

1R - 425-94

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, July 30, 2012 4:49 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 (1R425-94) Termination - ROC Vacuum E-31 EOL Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum E-31 EOL Site
Unit Letter E, Section 31, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-94) 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 July 2, 2012 (received July 3, 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 (1R425-94) 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

III 3 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 8654

July 2, 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-31 EOL (1R425-94): UL/E, 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 2010, ROC initiated work on the former E-31 EOL junction box as part of the system abandonment. The site is located in UL/E, Sec. 31 T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 112 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 7x3x5-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 5-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 32 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The excavated soil was returned to the excavation to ground surface and contoured to the surrounding area. On 5/21/2010, 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-31 EOL	E	31	17S	35E	Lea	Length	Width	Depth
							Eliminated		

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

Depth to Groundwater 112 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20*

Date Started 4/27/2010 Date Completed 4/27/2010 OCD Witness no

Soil Excavated 3.9 cubic yards Excavation Length 7 Width 3 Depth 5 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 4/27/2010 Sample Depth 5 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 5' GRAB	0.7	<10.0	<10.0	32

LOCATION	DEPTH	mg/kg
background	6"	83
vertical delineation trench at the junction (source)	1	139
	2	142
	3	110
	4	84
	5	55

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

the Vacuum SWD System abandonment. After the former junction box was removed an

investigation was conducted using a backhoe to collect soil sample at regular intervals

creating a 7x3x5-ft deep excavation. Each sample was field tested for chlorides and

organic vapors which yielded low concentrations similar to that of the background sample.

The deepest sample, 5 ft. BGS, was sent to a commercial laboratory for analysis of chloride and TPH which confirmed low concentrations.

The excavated soil was return to the excavation to ground surface and contoured to the surrounding area. On 5/21/2010, the site was

seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

*Two wells within 1320 ft.

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.

REPORT
ASSEMBLED BY Katie Jones

INITIAL KJ

COMPANY RICE OPERATING COMPANY

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE Larry B Baker Jr.

DATE 1-28-11

Vacuum E-31 EOL

Unit E, Section 31, T17S, R35E



Site prior to delineation

4/27/2010



Collecting Sample

4/27/2010



Backfilling excavation

4/27/2010



Seeding excavation

5/21/2010



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

ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: BRUCE BAKER
112 W. TAYLOR
HOBBS, NM 88240

Receiving Date: 04/28/10
Reporting Date: 04/30/10
Project Number: NOT GIVEN
Project Name: VAC. E-31 EOL
Project Location: VAC. E-31 EOL

Sampling Date: 04/27/10
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: JH
Analyzed By: AB/HM

LAB NUMBER SAMPLE ID

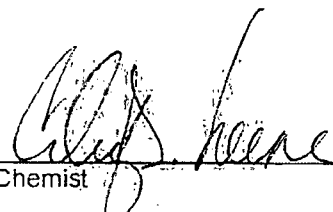
GRO DRO
(C₆-C₁₀) (>C₁₀-C₂₈) CI*
(mg/kg) (mg/kg) (mg/kg)

ANALYSIS DATE	04/29/10	04/29/10	04/30/10
H19769-1 SOURCE GRAB @ 5'	<10.0	<10.0	32
Quality Control	579	566	500
True Value QC	500	500	500
% Recovery	116	113	100
Relative Percent Difference	5.0	2.8	<0.1

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

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

Reported on wet weight.


Chemist


Date

H19769 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

#26

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:

<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Model: PGM 7300
Model: PGM 7300
Model: PGM 7300

Serial No: 590-000183
Serial No: 590-000508
Serial No: 590-000504

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Model: PGM 7600
Model: PGM 7600
Model: PGM 7600

Serial No: 110-023920
Serial No: 110-013744
Serial No: 110-013676

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: <u>9270-11</u>	EXPIRATION DATE: <u>11-16-2012</u>
FILL DATE: <u>11-13-09</u>	METER READING ACCURACY: <u>100 ppm</u>

ACCURACY: +/- 2%

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

SAMPLE ID	PID	SAMPLE ID	PID
Background	1.0	Source @ 1'	0.6
		2'	1.0
		3'	1.5
		4'	1.5
		5'	0.7

COPY

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

SIGNATURE:



DATE:

4-27-10