1R - 425-14

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, April 10, 2012 4:24 PM
To: Hack Conder
Cc: Leking, Geoffrey R, EMNRD; 'Katie Jones'; Laura Pena; 'Scott Curtis'
Subject: Remediation Plan (1R425-14) Termination - ROC Vacuum Oxy Swigart EOL Site

RE: Termination Request
for the Rice Operating Company's
Vacuum Oxy Swigart EOL Site
Unit Letter I, Section 25, T17S, R34E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-14) 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 March 27, 2012 (received April 9, 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 (1R425-14) 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

RICE *Operating Company*
122 West Taylor • Hobbs, New Mexico 88240
Phone: (575) 393-9174 • Fax: (575) 397-1471

March 27, 2012

RECEIVED
APR - 9 2012
Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

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 Oxy Swigart EOL (1R425-14): UL/I, 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 Oxy Swigart EOL junction box as part of the system abandonment. The site is located in UL/I, Sec. 25, T17S, R34E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 75 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating an 8x3x3-ft deep excavation. Each sample was field titrated for chlorides and field screen using a PID for hydrocarbons, resulting in low concentrations of each. The 3-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 178 mg/kg, a concentration of gasoline range organics (GRO) below detectable limits, and a diesel range organics (DRO) concentration of 113 mg/kg. Lab analysis confirmed TPH concentrations were within NMOCD guidelines. The excavated soil was blended on site, returned to the excavation, and contoured to the surrounding area. Additional clean soil was imported and used as a top cap to level the surface. On 1/4/2006, 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

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		
							Length	Width	Depth
Vacuum	OXY Swigart EOL	I	25	17S	34E	Lea	System Abandonment--no box		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER Roy Pearce & Jr. OTHER _____

Depth to Groundwater 75 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 9/19/2005 Date Completed 12/19/2005 NMOCD Witness no

Soil Excavated 3 cubic yards Excavation Length 8 Width 3 Depth 3 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 9/19/2005 Sample Depth 3 ft

TPH and chloride laboratory test results completed by using an approved laboratory and testing procedures pursuant to NMOCD guidelines.

Sample Location	PID ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
GRAB @ 3 ft BGS	0.0	<10.0	113	178

CHLORIDE FIELD TESTS

LOCATION	DEPTH (ft)	ppm
vertical trench at junction	1	677
	2	293
	3	155

General Description of Remedial Action:

This junction box was addressed as part of the Vacuum SWD System Abandonment. A delineation trench was made at the former junction location and soil samples were collect at 1, 2, and 3 ft BGS. Chloride field tests performed on the samples yielded low concentrations that exhibited a conclusive trend of decline with depth, indicative of unsaturated vadose historical conditions. PID screenings performed on the samples yielded no VOCs, all 0.0 ppm. The surrounding area did not exhibit any physical indications of adverse impact from the junction box. The 3 ft sample was analyzed at a laboratory for confirmation of the field tests. TPH concentrations met NMOCD guidelines. The excavated soil was blended on site and then backfilled into the trench and contoured to the surrounding terrain. Additional clean fill dirt was needed to level the surface. The disturbed area was seeded with a blend of native vegetation and is expected to return to productive capacity at a normal rate. Since the SWD System is no longer in service, a new junction box is not required.

enclosures: photos, lab results, PID field screenings

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

SITE SUPERVISOR Roy Rascon SIGNATURE Roy R. Rascon COMPANY RICE Operating Company

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE _____

DATE 1/9/2006 TITLE Project Scientist

Vacuum Oxy Swigart EOL

Unit 'I', Sec. 25, T17S, R34E

box removed; hole flagged 9/16/2005

seeding disturbed area 1/4/2006

ENVIRONMENTAL LAB OF

12600 West I-20 East - Odessa, Texas 79765

COPY

Analytical Report

Prepared for:

Roy Rascon

Rice Operating Co.

122 W. Taylor

Hobbs, NM 88240

Project: Vacuum Oxy Swigart EOL

Project Number: None Given

Location: None Given

Lab Order Number: 5I22005

Report Date: 09/26/05

Rice Operating Co.	Project: Vacuum Oxy Swigart EOL	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	Reported:
Hobbs NM, 88240	Project Manager: Roy Rascon	09/26/05 16:59

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Vert @ 3'	5122005-01	Soil	09/19/05 14:46	09/22/05 08:00

12600 West I-20 East - Odessa, Texas 79765 - (432) 563-1800 - Fax (432) 563-1713

Rice Operating Co.	Project: Vacuum Oxy Swigart EOL	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	Reported:
Hobbs NM, 88240	Project Manager: Roy Rascon	09/26/05 16:59

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Vert.@ 3' (5122005-01) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EI52304	09/23/05	09/23/05	EPA 8015M	
Diesel Range Organics >C12-C35	113	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	113	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*78.0 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*103 %*	*70-130*		"	"	"	"	

12600 West I-20 East - Odessa, Texas 79765 - (432) 563-1800 - Fax (432) 563-1713

General Chemistry Parameters by EPA / Standard Methods
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Note
Vert@3' (5I22005-01) Soil									
Chloride	178	10.0	mg/kg	20	EI52305	09/22/05	09/23/05	EPA 300.0	
% Moisture	2.9	0.1	%	1	EI52301	09/22/05	09/23/05	% calculation	

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EI52304 - Solvent Extraction (GC)										
Blank (EI52304-BLK1)			Prepared & Analyzed: 09/23/05							
Gasoline Range Organics C6-C12	ND	10.0	mg/kg wet							
Diesel Range Organics >C12-C35	ND	10.0	"							
Total Hydrocarbon C6-C35	ND	10.0	"							
Surrogate: 1-Chlorooctane	*44.0*		*mg/kg*	*50.0*		*88.0*	*70-130*			
Surrogate: 1-Chlorooctadecane	*37.7*		"	*50.0*		*75.4*	*70-130*			
LCS (EI52304-BS1)			Prepared & Analyzed: 09/23/05							
Gasoline Range Organics C6-C12	404	10.0	mg/kg wet	500		80.8	75-125			
Diesel Range Organics >C12-C35	489	10.0	"	500		97.8	75-125			
Total Hydrocarbon C6-C35	893	10.0	"	1000		89.3	75-125			
Surrogate: 1-Chlorooctane	*44.8*		*mg/kg*	*50.0*		*89.6*	*70-130*			
Surrogate: 1-Chlorooctadecane	*48.3*		"	*50.0*		*96.6*	*70-130*			
Calibration Check (EI52304-CCV1)			Prepared: 09/23/05 Analyzed: 09/24/05							
Gasoline Range Organics C6-C12	413		mg/kg	500		82.6	80-120			
Diesel Range Organics >C12-C35	443		"	500		88.6	80-120			
Total Hydrocarbon C6-C35	856		"	1000		85.6	80-120			
Surrogate: 1-Chlorooctane	*45.3*		"	*50.0*		*90.6*	*0-200*			
Surrogate: 1-Chlorooctadecane	*44.1*		"	*50.0*		*88.2*	*0-200*			
Matrix Spike (EI52304-MS1)	Source: 5122001-01		Prepared: 09/23/05 Analyzed: 09/24/05							
Gasoline Range Organics C6-C12	457	10.0	mg/kg dry	522	ND	87.5	75-125			
Diesel Range Organics >C12-C35	494	10.0	"	522	ND	94.6	75-125			
Total Hydrocarbon C6-C35	951	10.0	"	1040	ND	91.4	75-125			
Surrogate: 1-Chlorooctane	*55.3*		*mg/kg*	*50.0*		*111*	*70-130*			
Surrogate: 1-Chlorooctadecane	*51.8*		"	*50.0*		*104*	*70-130*			
Matrix Spike Dup (EI52304-MSD1)	Source: 5122001-01		Prepared: 09/23/05 Analyzed: 09/24/05							
Gasoline Range Organics C6-C12	463	10.0	mg/kg dry	522	ND	88.7	75-125	1.30	20	
Diesel Range Organics >C12-C35	500	10.0	"	522	ND	95.8	75-125	1.21	20	
Total Hydrocarbon C6-C35	963	10.0	"	1040	ND	92.6	75-125	1.25	20	
Surrogate: 1-Chlorooctane	*54.9*		*mg/kg*	*50.0*		*110*	*70-130*			
Surrogate: 1-Chlorooctadecane	*50.3*		"	*50.0*		*101*	*70-130*			

Rice Operating Co.	Project: Vacuum Oxy Swigart EOL	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	Reported:
Hobbs NM, 88240	Project Manager: Roy Rascon	09/26/05 16:59

General Chemistry Parameters by EPA / Standard Methods - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EI52301 - General Preparation (Prep)										
Blank (EI52301-BLK1)				Prepared: 09/22/05 Analyzed: 09/23/05						
% Solids	100		%							
Duplicate (EI52301-DUP1)	Source: 5121013-01			Prepared: 09/22/05 Analyzed: 09/23/05						
% Solids	86.5		%		86.1			0.464	20	
Duplicate (EI52301-DUP2)	Source: 5122008-07			Prepared: 09/22/05 Analyzed: 09/23/05						
% Solids	99.4		%		98.9			0.504	20	
Duplicate (EI52301-DUP3)	Source: 5122019-03			Prepared: 09/22/05 Analyzed: 09/23/05						
% Solids	97.6		%		97.8			0.205	20	
Duplicate (EI52301-DUP4)	Source: 5122021-18			Prepared: 09/22/05 Analyzed: 09/23/05						
% Solids	90.8		%		90.6			0.221	20	
Batch EI52305 - Water Extraction										
Blank (EI52305-BLK1)				Prepared: 09/22/05 Analyzed: 09/23/05						
Chloride	ND	0.500	mg/kg							
LCS (EI52305-BS1)				Prepared: 09/22/05 Analyzed: 09/23/05						
Chloride	9.07		mg/L	10.0		90.7	80-120			
Calibration Check (EI52305-CCV1)				Prepared: 09/22/05 Analyzed: 09/23/05						
Chloride	9.29		mg/L	10.0		92.9	80-120			
Duplicate (EI52305-DUP1)	Source: 5121013-01			Prepared: 09/22/05 Analyzed: 09/23/05						
Chloride	90.7	0.500	mg/kg		91.3			0.659	20	

Rice Operating Co.	Project: Vacuum Oxy Swigart EOL	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	Reported:
Hobbs NM, 88240	Project Manager: Roy Rascon	09/26/05 16:59

Notes and Definitions

DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
RPD	Relative Percent Difference
LCS	Laboratory Control Spike
MS	Matrix Spike
Dup	Duplicate

Report Approved By: _____ Date: 9-26-05

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer
Jeanne Mc Murrey, Inorg. Tech Director
LaTasha Cornish, Chemist
Sandra Sanchez, Lab Tech.

Environmental Lab of Texas, Inc.

12600 West I-20 East
Odessa, Texas 79763
Phone: 915-563-1800
Fax: 915-563-1713

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: Ray R. Rascon
Company Name: Rice Operating Co.
Company Address: 122 W. Taylor
City/State/Zip: Hobbs, NM. 88240
Telephone No: 505-393-9174 Fax No: 505-397-1471
Sampler Signature: Ray R. Rascon

Project Name: Vac. Oxy Swigart EOL
Project #:
Project Loc:
PO #:

LAB # (lab use only)	FIELD CODE	Date Sampled	Time Sampled	No. of Containers	Preservative: Ice	HNO3	HCl	NaOH	H2SO4	None	Other (specify)	Matrix: Water	Sludge	Soil	Other (specify)	Analyze For: TCLP/TOTAL: TDS (Cl) SAR / EC	TPH 418.1	TPH TX 1005/1006	TPH 8015M GRO/DRO	Metals: As Ag Ba Cd Cr Pb Hg Se	Volatiles	Semivolatiles	BTEX 8021B/5030									TAT (Pre-Schedule)
5W1005		9-18-05	2:46 P	1	✓									✓		✓			✓			12 24										
	Vert. @ 3'	9-19-05	2:46 P	1	✓									✓		✓			✓													

Special Instructions:

Sample Containers Intact? Y N
Temperature Upon Receipt:
Laboratory Comments: labels/seals

Relinquished by:	Date	Time	Received by:	Date	Time
Ray R. Rascon	9-20-05	5:00 P		9/21	10:20
Relinquished by:	Date	Time	Received by ELOT:	Date	Time
	9/21	8:00	Carrie Cooper	9/22/05	8:00

Environmental Lab of Texas
Variance / Corrective Action Report – Sample Log-In

Client: BEG Op.

Date/Time: 9/22/05 8:00

Order #: ELT 22005

Initials: CK

Sample Receipt Checklist

Temperature of container/cooler?	Yes	No	-1.6 C
Shipping container/cooler in good condition?	(Yes)	No	
Custody Seals intact on shipping container/cooler?	(Yes)	No	Not present
Custody Seals intact on sample bottles?	(Yes)	No	Not present
Chain of custody present?	(Yes)	No	
Sample Instructions complete on Chain of Custody?	(Yes)	No	
Chain of Custody signed when relinquished and received?	(Yes)	No	
Chain of custody agrees with sample label(s)	(Yes)	No	*
Container labels legible and intact?	(Yes)	No	
Sample Matrix and properties same as on chain of custody?	(Yes)	No	
Samples in proper container/bottle?	(Yes)	No	
Samples properly preserved?	(Yes)	No	
Sample bottles intact?	(Yes)	No	
Preservations documented on Chain of Custody?	(Yes)	No	
Containers documented on Chain of Custody?	(Yes)	No	
Sufficient sample amount for indicated test?	(Yes)	No	
All samples received within sufficient hold time?	(Yes)	No	
VOC samples have zero headspace?	(Yes)	No	Not Applicable

Other observations:

* discrepancy on sample time COC-2:46 Label-3:46

Variance Documentation:

Contact Person: Roy Rascon Date/Time: 09-26-05 Contacted by: Jeanne McMurray

Regarding:

* sample time discrepancy

Corrective Action Taken:

Client wants to reference COC time 2:46 as per attached e-mail

RICE OPERATING COMPANY

122 WEST TAYLOR
HOBBS, NEW MEXICO 88240
PHONE: (505) 393-9174 FAX: (505) 397-1471

VOC FIELD TEST REPORT FORM

MINI RAE PLUS CLASSIC PHOTOIONIZATION GAS DETECTOR

MODEL NO: PGM 761S
SERIAL NO: 104412
CALIBRATION GAS
GAS COMPOSITION: ISOBUTYLENE 100 PPM
AIR BALANCE
LOT NO: 04-2747 FILL DATE: 2-1-05
EXP. DATE: 8-1-06 ACCURACY: +/- 2%
METER READING
ACCURACY: 100.6

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
VAC	OXY Scrubber EOL				

Vertical @ Source @ 3'

SAMPLE	PID RESULT	SAMPLE	PID RESULT
1'	0.0		
2'	0.0		
3'	0.0		

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

Ray P. Rascon
Signature

9-19-05
Date