1R - 425-07

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, April 12, 2012 2:55 PM
To: Hack Conder
Cc: Leking, Geoffrey R, EMNRD; 'Katie Jones'; Laura Pena; 'Scott Curtis'
Subject: Remediation Plan (1R425-07) Termination- ROC Vacuum Jct A-31-1 Site

RE: Termination Request
for the Rice Operating Company's
Vacuum Jct A-31-1 Site
Unit Letter A, Section 31, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-07) 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 April 4, 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 (1R425-07) 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

April 4, 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 Jct. A-31-1 (1R425-07): 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 2005, ROC initiated work on the former A-31-1 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 an 8x3x9-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 128 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The excavated soil was blended on site then returned to the excavation to ground surface and contoured to the surrounding area. On 12/23/2005, 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	jct. A-31-1	A	31	17S	35S	Lea	System Abandonment–no box		

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

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

Date Started 8/30/2005 Date Completed 12/23/2005 NMOCD Witness no

Soil Excavated 9 cubic yards **Excavation** Length 8 Width 3 Depth 9 feet

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

FINAL ANALYTICAL RESULTS: **Sample Date** 9/30/2005 **Sample Depth** 9 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 @ 9 ft BGS	0.2	<10.0	<10.0	128

CHLORIDE FIELD TESTS

LOCATION	DEPTH (ft)	ppm
vertical trench at junction box	4	116
	5	86
	6	179
	7	153
	8	113
	9	148

General Description of Remedial Action:

This junction box was addressed as part of the Vacuum SWD System Abandonment. After the box materials were removed, a delineation trench was made using a backhoe while soil samples were collected every ft of depth at 4-9 ft BGS. Chloride field tests were performed on these samples and yielded very low concentrations. PID screenings were also performed on the samples and these concentrations were also very low. The soil samples did not exhibit any physical indications of impact from the junction box operations. A grab sample at 9 ft BGS was analyzed at a laboratory for confirmation of the field tests. TPH was not present within the lab's detection limits (<10.0 ppm), meeting NMOCD guidelines. The excavated soil was blended on site and then backfilled into the trench. The disturbed surface was seeded with a blend of native vegetation and is expected to return to productive capacity at a normal rate.

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 Jorge Hernandez SIGNATURE not available COMPANY RICE Operating Company

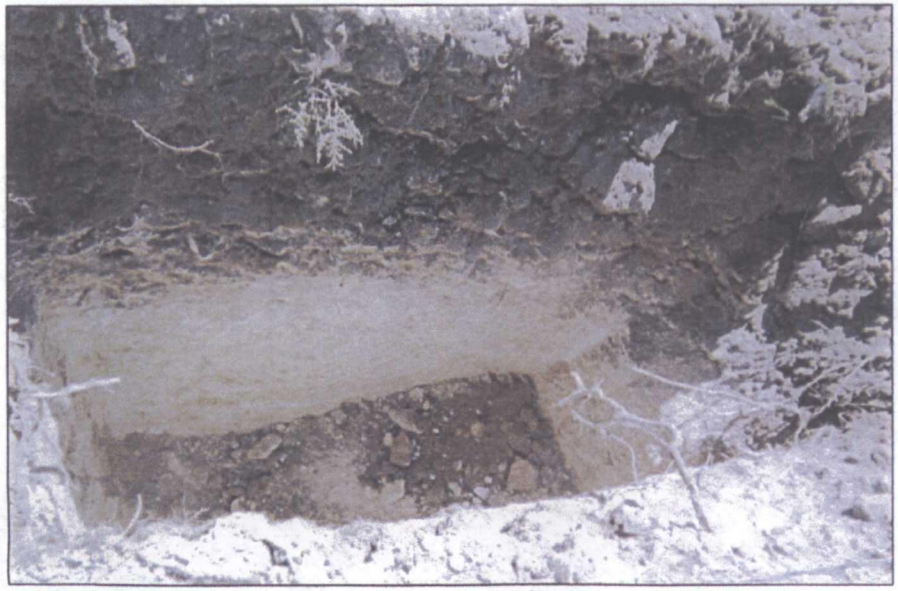
REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE Kristin Farris Pope

DATE 1/3/2006 TITLE Project Scientist

Vacuum jct. A-31-1

Unit 'A', Sec. 31, T17D, R35E

undisturbed junction box 6/27/2005



delineation trench at former box site 8/30/2005

seeding backfilled site 12/23/2005

ENVIRONMENTAL LAB OF

12600 West I-20 East - Odessa, Texas 79765

Analytical Report

Prepared for:

Roy Rascon
Rice Operating Co.
122 W. Taylor
Hobbs, NM 88240

Project: Vacuum Jct. A-31-1
Project Number: None Given
Location: None Given

Lab Order Number: 5H31020

Report Date: 09/02/05

Rice Operating Co.	Project: Vacuum Jct. A-31-1	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	09/02/05 13:21

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Bottom Grab Sample@ 9'	5H31020-01	Soil	08/30/05 13:15	08/31/05 16:35

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Rice Operating Co.	Project: Vacuum Jct. A-31-1	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	09/02/05 13:21

Organics by GC

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Bottom Grab Sample@ 9' (5H31020-01) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EI50104	09/01/05	09/01/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*84.8 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*93.8 %*	*70-130*		"	"	"	"	

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Rice Operating Co.	Project: Vacuum Jct. A-31-1	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	Reported:
Hobbs NM, 88240	Project Manager: Roy Rascon	09/02/05 13:21

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

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Bottom Grab Sample@ 9' (5H31020-01) Soil									
Chloride	**128**	5.00	mg/kg	10	EI50204	09/01/05	09/01/05	EPA 300.0	
% Moisture	**9.7**	0.1	%	1	EI50201	09/01/05	09/02/05	% calculation	

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Rice Operating Co.	Project: Vacuum Jct. A-31-1	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	Reported:
Hobbs NM, 88240	Project Manager: Roy Rascon	09/02/05 13:21

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 EI50104 - Solvent Extraction (GC)										
Blank (EI50104-BLK1)				Prepared & Analyzed: 09/01/05						
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	*40.9*		*mg/kg*	*50.0*		*81.8*	*70-130*			
Surrogate: 1-Chlorooctadecane	*43.0*		*"*	*50.0*		*86.0*	*70-130*			
LCS (EI50104-BS1)				Prepared & Analyzed: 09/01/05						
Gasoline Range Organics C6-C12	411	10.0	mg/kg wet	500		82.2	75-125			
Diesel Range Organics >C12-C35	436	10.0	"	500		87.2	75-125			
Total Hydrocarbon C6-C35	847	10.0	"	1000		84.7	75-125			
Surrogate: 1-Chlorooctane	*55.7*		*mg/kg*	*50.0*		*111*	*70-130*			
Surrogate: 1-Chlorooctadecane	*53.5*		*"*	*50.0*		*107*	*70-130*			
Calibration Check (EI50104-CCV1)				Prepared: 09/01/05 Analyzed: 09/02/05						
Gasoline Range Organics C6-C12	460		mg/kg	500		92.0	80-120			
Diesel Range Organics >C12-C35	450		"	500		90.0	80-120			
Total Hydrocarbon C6-C35	910		"	1000		91.0	80-120			
Surrogate: 1-Chlorooctane	*56.5*		*"*	*50.0*		*113*	*0-200*			
Surrogate: 1-Chlorooctadecane	*62.5*		*"*	*50.0*		*125*	*0-200*			
Matrix Spike (EI50104-MS1)	**Source: 5H31020-01**			Prepared & Analyzed: 09/01/05						
Gasoline Range Organics C6-C12	478	10.0	mg/kg dry	554	ND	86.3	75-125			
Diesel Range Organics >C12-C35	441	10.0	"	554	ND	79.6	75-125			
Total Hydrocarbon C6-C35	919	10.0	"	1110	ND	82.8	75-125			
Surrogate: 1-Chlorooctane	*57.7*		*mg/kg*	*50.0*		*115*	*70-130*			
Surrogate: 1-Chlorooctadecane	*53.1*		*"*	*50.0*		*106*	*70-130*			
Matrix Spike Dup (EI50104-MSD1)	**Source: 5H31020-01**			Prepared & Analyzed: 09/01/05						
Gasoline Range Organics C6-C12	472	10.0	mg/kg dry	554	ND	85.2	75-125	1.26	20	
Diesel Range Organics >C12-C35	454	10.0	"	554	ND	81.9	75-125	2.91	20	
Total Hydrocarbon C6-C35	926	10.0	"	1110	ND	83.4	75-125	0.759	20	
Surrogate: 1-Chlorooctane	*56.0*		*mg/kg*	*50.0*		*112*	*70-130*			
Surrogate: 1-Chlorooctadecane	*53.1*		*"*	*50.0*		*106*	*70-130*			

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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 EI50201 - General Preparation (Prep)										
Blank (EI50201-BLK1)				Prepared: 09/01/05 Analyzed: 09/02/05						
% Solids	100		%							
Duplicate (EI50201-DUP1)		Source: 5H31020-01		Prepared: 09/01/05 Analyzed: 09/02/05						
% Solids	91.1		%		90.3			0.882	20	
Duplicate (EI50201-DUP2)		Source: 5I01027-02		Prepared: 09/01/05 Analyzed: 09/02/05						
% Solids	90.4		%		90.6			0.221	20	
Batch EI50204 - Water Extraction										
Blank (EI50204-BLK1)				Prepared & Analyzed: 09/01/05						
Chloride	ND	0.500	mg/kg							
LCS (EI50204-BS1)				Prepared & Analyzed: 09/01/05						
Chloride	8.56		mg/L	10.0		85.6	80-120			
Calibration Check (EI50204-CCV1)				Prepared & Analyzed: 09/01/05						
Chloride	8.73		mg/L	10.0		87.3	80-120			
Duplicate (EI50204-DUP1)		Source: 5H31013-01		Prepared & Analyzed: 09/01/05						
Chloride	2550	50.0	mg/kg		2570			0.781	20	

Rice Operating Co.	Project: Vacuum Jct. A-31-1	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	Reported:
Hobbs NM, 88240	Project Manager: Roy Rascon	09/02/05 13:21

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: Raland K Tuttle Date: 9-06-05

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

Project Name: Vaccuum - Jct A-31-1
Project #:
Project Loc:
PO #:

LAB # (lab use only) 5/31/2020	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: / CLI	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	EC, CEC, SAR, ESP	Major cations/anions, TDS					RUSH TAT (Pre-Schedule)	Standard TAT
-01	Bottom Grab Sample @ 9'	8-30-05	11:15	1	X									X		X			X												

Special Instructions:

Sample Containers Intact? Y N
Temperature Upon Receipt:
Laboratory Comments:
-0.5
402
labels/seals x2

Relinquished by:	Date	Time	Received by:	Date	Time
	5-30-05	17:00		5/31	17:00
Relinquished by:	Date	Time	Received by ELOT:	Date	Time
	5/31	16:35		5/31/05	16:35

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

Client: Rice Op.

Date/Time: 8/31/05

Order #: 5H31020

Initials: CK

Sample Receipt Checklist

Temperature of container/cooler?	Yes	No	-0.5 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:

_____

_____

_____

Variance Documentation:

Contact Person: _____ Date/Time: _____ Contacted by: _____

Regarding:

_____

_____

_____

Corrective Action Taken:

_____

_____

_____

_____

_____

_____

_____

_____

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: 2-105
EXP. DATE: 8-1-06
ACCURACY: ± 2%
METER READING
ACCURACY: 100

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
Vacuum	Jct-A-31-1	A	31	17S	35E

SAMPLE	PID RESULT	SAMPLE	PID RESULT
Source @ 4'	5.0	Grab Bottom Sample @ 9'	0.2
5'	0.4		
6'	0.9		
7'	0.2		
8'	0.7		
9'	0.3		

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

Signature

8-30-05
Date