1R - 425-13

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, April 19, 2012 10:06 AM
To: 'Hack Conder'
Cc: Leking, Geoffrey R, EMNRD; 'Katie Jones'; 'Laura Pena'; 'Scott Curtis'
Subject: Remediation Plan (1R425-13) Termination - ROC Vacuum Jct H-27 Site

RE: Termination Request
for the Rice Operating Company's
Vacuum Jct H-27 Site
Unit Letter H, Section 27, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-13) 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 (1R425-13) 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

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. H-27 (1R425-13): UL/H, Sec. 27, 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 H-27 junction box as part of the system abandonment. The site is located in UL/H, Sec. 27, T17S, R35E. 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 8x3x7-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 7-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 118 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. H-27	H	27	17S	35E	Lea	System Abandonment--no box		

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

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

Date Started 7/28/2005 Date Completed 12/23/2005 NMOCD Witness no

Soil Excavated 6 cubic yards **Excavation** Length 8 Width 3 Depth 7 feet

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

FINAL ANALYTICAL RESULTS: **Sample Date** 7/29/2005 **Sample Depth** 7 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 @ 7 ft BGS	0.0	<10.0	<10.0	118

CHLORIDE FIELD TESTS

LOCATION	DEPTH (ft)	ppm
vertical trench at junction box	3	187
	4	118
	5	121
	6	141
	7	110

General Description of Remedial Action:

This junction box was addressed as part of the Vacuum System Abandonment. After removing the box materials, a delineation trench was made with a backhoe at the junction while soil samples were collected every ft of depth to 7 ft BGS. Chloride field tests were performed on the samples and yielded low concentrations similar to background level. PID screenings were also performed and also exhibited low concentrations. A grab sample at 7 ft BGS was analyzed at a laboratory for confirmation of the field tests. TPH concentrations were below the lab's detection limits (<10.0 ppm), meeting NMOCD guidelines. The excavated soil was blended on site and then backfilled into the trench and contoured to the surrounding surface. The disturbed area 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.

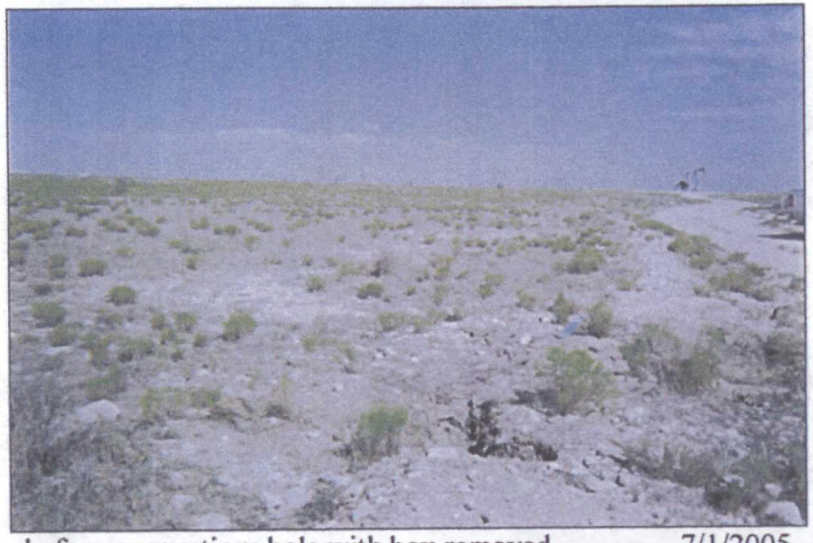
SITE SUPERVISOR Jorge Hernandez SIGNATURE not available COMPANY RICE Operating Company

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE Kristin Farris Pope

DATE 1/4/2006 TITLE Project Scientist

Vacuum jct. H-27

Unit 'H', Sec. 27, T17S, R35E



before excavation; hole with box removed 7/1/2005

delineation trench at former box site 7/28/2005

seeding disturbed surface 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

COPY

Project: Vacuum Jct. H-27
Project Number: None Given
Location: None Given

Lab Order Number: 5H01005

Report Date: 08/04/05

Rice Operating Co.	Project: Vacuum Jct. H-27	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	08/04/05 10:35

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Bottom Sample @ 7'	5H01005-01	Soil	07/29/05 08:15	07/29/05 17:45

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

Rice Operating Co.	Project: Vacuum Jct. H-27	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	08/04/05 10:35

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Bottom Sample @ 7' (5H01005-01) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EH50101	08/01/05	08/01/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*92.4 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*121 %*	*70-130*		"	"	"	"	

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Rice Operating Co.	Project: Vacuum Jct. H-27	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	08/04/05 10:35

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

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Bottom Sample @ 7' (5H01005-01) Soil									
Chloride	**118**	5.00	mg/kg	10	EH50311	08/03/05	08/03/05	EPA 300.0	
% Moisture	**10.2**	0.1	%	1	EH50201	08/01/05	08/02/05	% calculation	

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Rice Operating Co.	Project: Vacuum Jct. H-27	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	Reported:
Hobbs NM, 88240	Project Manager: Roy Rascon	08/04/05 10:35

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 EH50101 - Solvent Extraction (GC)										
Blank (EH50101-BLK1)				Prepared & Analyzed: 08/01/05						
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	*43.9*		*mg/kg*	*50.0*		*87.8*	*70-130*			
Surrogate: 1-Chlorooctadecane	*59.9*		*"*	*50.0*		*120*	*70-130*			
LCS (EH50101-BS1)				Prepared & Analyzed: 08/01/05						
Gasoline Range Organics C6-C12	442	10.0	mg/kg wet	500		88.4	75-125			
Diesel Range Organics >C12-C35	447	10.0	"	500		89.4	75-125			
Total Hydrocarbon C6-C35	889	10.0	"	1000		88.9	75-125			
Surrogate: 1-Chlorooctane	*49.7*		*mg/kg*	*50.0*		*99.4*	*70-130*			
Surrogate: 1-Chlorooctadecane	*62.8*		*"*	*50.0*		*126*	*70-130*			
Calibration Check (EH50101-CCV1)				Prepared & Analyzed: 08/01/05						
Gasoline Range Organics C6-C12	455		mg/kg	500		91.0	80-120			
Diesel Range Organics >C12-C35	451		"	500		90.2	80-120			
Total Hydrocarbon C6-C35	906		"	1000		90.6	80-120			
Surrogate: 1-Chlorooctane	*56.1*		*"*	*50.0*		*112*	*0-200*			
Surrogate: 1-Chlorooctadecane	*64.3*		*"*	*50.0*		*129*	*0-200*			
Matrix Spike (EH50101-MS1)	**Source: 5G29011-01**			Prepared & Analyzed: 08/01/05						
Gasoline Range Organics C6-C12	459	10.0	mg/kg dry	542	ND	84.7	75-125			
Diesel Range Organics >C12-C35	558	10.0	"	542	51.3	93.5	75-125			
Total Hydrocarbon C6-C35	1020	10.0	"	1080	51.3	89.7	75-125			
Surrogate: 1-Chlorooctane	*49.6*		*mg/kg*	*50.0*		*99.2*	*70-130*			
Surrogate: 1-Chlorooctadecane	*63.2*		*"*	*50.0*		*126*	*70-130*			
Matrix Spike Dup (EH50101-MSD1)	**Source: 5G29011-01**			Prepared & Analyzed: 08/01/05						
Gasoline Range Organics C6-C12	470	10.0	mg/kg dry	542	ND	86.7	75-125	2.37	20	
Diesel Range Organics >C12-C35	560	10.0	"	542	51.3	93.9	75-125	0.358	20	
Total Hydrocarbon C6-C35	1030	10.0	"	1080	51.3	90.6	75-125	0.976	20	
Surrogate: 1-Chlorooctane	*50.0*		*mg/kg*	*50.0*		*100*	*70-130*			
Surrogate: 1-Chlorooctadecane	*62.3*		*"*	*50.0*		*125*	*70-130*			

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Rice Operating Co.	Project: Vacuum Jct. H-27	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	08/04/05 10:35

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 EH50201 - General Preparation (Prep)										
Blank (EH50201-BLK1)				Prepared: 08/01/05 Analyzed: 08/02/05						
% Moisture	ND	0.1	%							
Duplicate (EH50201-DUP1)		**Source: 5G29011-01**		Prepared: 08/01/05 Analyzed: 08/02/05						
% Moisture	8.3	0.1	%		7.8			6.21	20	
Batch EH50311 - Water Extraction										
Blank (EH50311-BLK1)				Prepared & Analyzed: 08/03/05						
Chloride	ND	0.500	mg/kg							
LCS (EH50311-BS1)				Prepared & Analyzed: 08/03/05						
Chloride	10.1		mg/L	10.0		101	80-120			
Calibration Check (EH50311-CCV1)				Prepared & Analyzed: 08/03/05						
Chloride	10.4		mg/L	10.0		104	80-120			
Duplicate (EH50311-DUP1)		**Source: 5H01003-01RE1**		Prepared & Analyzed: 08/03/05						
Chloride	989	25.0	mg/kg		975			1.43	20	

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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: 8-04-05

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: Vacuum Jct H-27
Project #:
Project Loc:
PO #:

LAB # (lab use only)	FIELD CODE	Date Sampled	Time Sampled	No. of Containers	Preservative: Ice	Preservative: HNO_3	Preservative: HCl	Preservative: NaOH	Preservative: H_2SO_4	Preservative: None	Preservative: Other (Specify)	Matrix: Water	Matrix: Sludge	Matrix: Soil	Matrix: Other (specify):	Analyze For: TCLP: / TOTAL: / CL /	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
5H01005																															
001	BeHam Sample @ 7'	7-29-05	8:15	1	X									X		+			X												

Special Instructions:

Sample Containers Intact? Y N
Temperature Upon Receipt:
Laboratory Comments: 1.0°C
4oz glass on ice w/label+seal seal on cooler

Relinquished by:	Date	Time	Received by:	Date	Time
Dan Hamm	7-29-05		CM Haynes	7/29	15:00
Relinquished by:	Date	Time	Received by ELOT:	Date	Time
CM Haynes	7/29	17:05	Jeanne McMurray	7-29-05	1745

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

Client: Rice Operating Co.

Date/Time: 08-01-05 @ 0915

Order #: 5H01005

Initials: JMM

Sample Receipt Checklist

Temperature of container/cooler?	(Yes)	No	1.0 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

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

VOC FIELD TEST REPORT FORM

MODEL NO: PGM 76IS
CALIBRATION GAS
GAS COMPOSITION: ISOBUTYLENE AIR

LOT NO: 04-2747
EXP. DATE: 8-6-06
METER READING
ACCURACY: 100

SERIAL NO: 104412

100 PPM
BALANCE
FILL DATE: 2-1-05
ACCURACY: ± 2%

SYSTEM	JUNCION	UNIT	SECTION	TOWNSHIP	RANGE
VACUUM	H-27	H	27	17S	35E

Grab at 7 ft BGS

SAMPLE	PID RESULT	SAMPLE	PID RESULT
Sample Bottom @ 7'	6.7		

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

Signature Jay Hernandez Date 9-29-05