

1R - 425-09

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, April 30, 2012 6:09 PM
To: Hack Conder (hconder@riceswd.com)
Cc: Leking, Geoffrey R, EMNRD; Katie Jones <kjones@riceswd.com> (kjones@riceswd.com);
Laura Pena (lpena@riceswd.com); Scott Curtis (scurtis@riceswd.com)
Subject: Remediation Plan (1R425-09) Termination - ROC Vacuum Vent B-5-1 Boot Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum Vent B-5-1 Boot Site
Unit Letter B, Section 5, T18S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-09) 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 13, 2012 (received April 20, 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 (1R425-09) 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 13, 2012

RECEIVED

APR 20 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

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

RE: Termination Request
Vacuum vent B-5-1 boot (1R425-09): UL/B, Sec. 5, T18S, 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 vent B-5-1 boot junction box as part of the system abandonment. The site is located in UL/B, Sec. 5, T18S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 70 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating an 8x3x8-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 8-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 46.9 mg/kg, a gasoline range organics (GRO) concentration of 8.22 mg/kg, and a diesel range organics (DRO) of 113 mg/kg. The excavated soil was blended on site then returned to the excavation to ground surface and contoured to the surrounding area. On 12/2/2005, 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

A handwritten signature in black ink, appearing to read "H. Conder", written in a cursive style.

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	B-5-1 boot vent	B	5	18S	35E	Lea	no box-system abandonment		

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

Depth to Groundwater 70 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 9/13/2005 Date Completed 12/2/2005 NMOCD Witness no

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

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

FINAL ANALYTICAL RESULTS: Sample Date 9/13/2005 Sample Depth 8 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 ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
VERTICAL GRAB @ 8 ft BGS	0.0	8.22	113	46.9

LOCATION	DEPTH (ft)	ppm
delineation trench at junction	3	52
	4	92
	5	85
	6	87
	7	72
	8	57
background	surface	72

General Description of Remedial Action:

This junction box contained a vent and a boot and was addressed as part of the Vacuum SWD System abandonment. After the box was removed, a delineation trench was made at the junction with a backhoe. Soil samples were collected every ft of depth from 3 to 8 ft BGS. Chloride field tests were conducted on every sample and concentrations were <100 ppm for all samples. Laboratory analysis of the 8 ft grab sample yielded 46.9 ppm chloride, similar to background level. There were no physical indicators of hydrocarbon impact in the soil samples and all PID screenings performed on the samples were 0.0 ppm. Lab analysis confirmed that NOMCD TPH guidelines were met. The excavated soil was blended on site and then backfilled into the trench. The disturbed surface was seeded with a blend of native vegetation on 12/2/2005 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 Roy Rascon SIGNATURE Roy R. Rascon COMPANY RICE Operating Company

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE Kristin Farris Pope
DATE 12/12/2005 TITLE Project Scientist



undisturbed junction box

7/28/2005

Vacuum B-5-1 boot vent

Unit 'B', Sec. 5, T18S, R35E



junction box removed

8/18/2005



delineation trench at former box site

9/13/2005



8-ft-deep delineation trench

9/13/2005



8-ft-deep delineation trench

9/13/2005



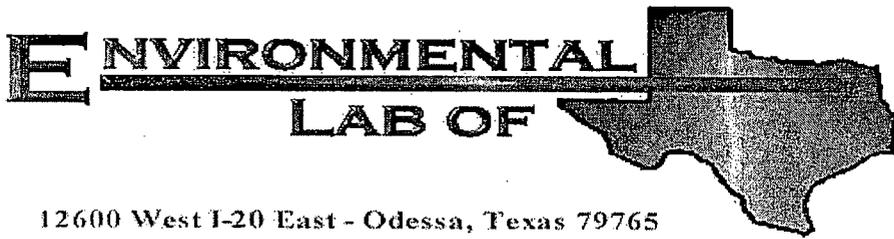
backfilling and compacting trench

12/2/2005



seeding and watering backfilled site

12/2/2005



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 Vent B-5-1 (Boot)

Project Number: None Given

Location: None Given

Lab Order Number: 5I15004

Report Date: 09/20/05

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

Project: Vacuum Vent B-5-1 (Boot)
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
09/20/05 12:39

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Vert@ 8'	5I15004-01	Soil	09/13/05 13:00	09/15/05 07:40

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

Project: Vacuum Vent B-5-1 (Boot)
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
09/20/05 12:39

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Vert@ 8' (5I15004-01) Soil									
Gasoline Range Organics C6-C12	J [8.22]	10.0	mg/kg dry	1	E151514	09/15/05	09/16/05	EPA 8015M	J
Diesel Range Organics >C12-C35	113	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	113	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		83.8 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		100 %	70-130		"	"	"	"	

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

Project: Vacuum Vent B-5-1 (Boot)
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
09/20/05 12:39

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

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Vert@ 8' (S115004-01) Soil									
Chloride	46.9	5.00	mg/kg	10	E151603	09/15/05	09/15/05	EPA 300.0	
% Moisture	8.2	0.1	%	1	E151609	09/15/05	09/16/05	% calculation	

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

Project: Vacuum Vent B-5-1 (Boot)
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
09/20/05 12:39

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
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Batch EI51514 - Solvent Extraction (GC)

Blank (EI51514-BLK1)

Prepared: 09/15/05 Analyzed: 09/16/05

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	40.4		mg/kg	50.0		80.8	70-130			
Surrogate: 1-Chlorooctadecane	52.0		"	50.0		104	70-130			

LCS (EI51514-BS1)

Prepared: 09/15/05 Analyzed: 09/16/05

Gasoline Range Organics C6-C12	433	10.0	mg/kg wet	500		86.6	75-125			
Diesel Range Organics >C12-C35	419	10.0	"	500		83.8	75-125			
Total Hydrocarbon C6-C35	852	10.0	"	1000		85.2	75-125			
Surrogate: 1-Chlorooctane	50.0		mg/kg	50.0		100	70-130			
Surrogate: 1-Chlorooctadecane	51.2		"	50.0		102	70-130			

Calibration Check (EI51514-CCV1)

Prepared: 09/15/05 Analyzed: 09/19/05

Gasoline Range Organics C6-C12	413		mg/kg	500		82.6	80-120			
Diesel Range Organics >C12-C35	460		"	500		92.0	80-120			
Total Hydrocarbon C6-C35	873		"	1000		87.3	80-120			
Surrogate: 1-Chlorooctane	53.5		"	50.0		107	0-200			
Surrogate: 1-Chlorooctadecane	53.8		"	50.0		108	0-200			

Matrix Spike (EI51514-MS1)

Source: 5I15002-02

Prepared: 09/15/05 Analyzed: 09/16/05

Gasoline Range Organics C6-C12	558	10.0	mg/kg dry	549	ND	102	75-125			
Diesel Range Organics >C12-C35	569	10.0	"	549	ND	104	75-125			
Total Hydrocarbon C6-C35	1130	10.0	"	1100	ND	103	75-125			
Surrogate: 1-Chlorooctane	53.9		mg/kg	50.0		108	70-130			
Surrogate: 1-Chlorooctadecane	46.8		"	50.0		93.6	70-130			

Matrix Spike Dup (EI51514-MSD1)

Source: 5I15002-02

Prepared: 09/15/05 Analyzed: 09/16/05

Gasoline Range Organics C6-C12	551	10.0	mg/kg dry	549	ND	100	75-125	1.26	20	
Diesel Range Organics >C12-C35	589	10.0	"	549	ND	107	75-125	3.45	20	
Total Hydrocarbon C6-C35	1140	10.0	"	1100	ND	104	75-125	0.881	20	
Surrogate: 1-Chlorooctane	54.2		mg/kg	50.0		108	70-130			
Surrogate: 1-Chlorooctadecane	46.7		"	50.0		93.4	70-130			

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 EI51603 - Water Extraction										
Blank (EI51603-BLK1)					Prepared & Analyzed: 09/15/05					
Chloride	ND	0.500	mg/kg							
LCS (EI51603-BS1)					Prepared & Analyzed: 09/15/05					
Chloride	8.59		mg/L	10.0		85.9	80-120			
Calibration Check (EI51603-CCV1)					Prepared & Analyzed: 09/15/05					
Chloride	8.66		mg/L	10.0		86.6	80-120			
Duplicate (EI51603-DUP1)					Source: 5I13016-04 Prepared & Analyzed: 09/15/05					
Chloride	896	10.0	mg/kg		897			0.112	20	
Batch EI51609 - General Preparation (Prep)										
Blank (EI51609-BLK1)					Prepared: 09/15/05 Analyzed: 09/16/05					
% Solids	100		%							
Duplicate (EI51609-DUP1)					Source: 5I14003-01 Prepared: 09/15/05 Analyzed: 09/16/05					
% Solids	90.2		%		89.6			0.667	20	
Duplicate (EI51609-DUP2)					Source: 5I15013-01 Prepared: 09/15/05 Analyzed: 09/16/05					
% Solids	89.9		%		88.9			1.12	20	

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

Project: Vacuum Vent B-5-1 (Boot)
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
09/20/05 12:39

Notes and Definitions

J Detected but below the Reporting Limit; therefore, result is an estimated concentration (CLP J-Flag).
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: 9-20-05

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.

This material is intended only for the use of the individual (s) or entity to whom it is addressed, and may contain information that is privileged and confidential.

If you have received this material in error, please notify us immediately at 432-563-1800.

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

Client: Rice Operating

Date/Time: 9-15-05 - 0740

Order #: SI15004

Initials: MT

Sample Receipt Checklist

Temperature of container/cooler?	<input checked="" type="checkbox"/> Yes	No	3.5 C
Shipping container/cooler in good condition?	<input checked="" type="checkbox"/> Yes	No	
Custody Seals intact on shipping container/cooler?	<input checked="" type="checkbox"/> Yes	No	Not present
Custody Seals intact on sample bottles?	<input checked="" type="checkbox"/> Yes	No	Not present
Chain of custody present?	<input checked="" type="checkbox"/> Yes	No	
Sample Instructions complete on Chain of Custody?	<input checked="" type="checkbox"/> Yes	No	
Chain of Custody signed when relinquished and received?	<input checked="" type="checkbox"/> Yes	No	
Chain of custody agrees with sample label(s)	<input checked="" type="checkbox"/> Yes	No	
Container labels legible and intact?	<input checked="" type="checkbox"/> Yes	No	
Sample Matrix and properties same as on chain of custody?	<input checked="" type="checkbox"/> Yes	No	
Samples in proper container/bottle?	<input checked="" type="checkbox"/> Yes	No	
Samples properly preserved?	<input checked="" type="checkbox"/> Yes	No	
Sample bottles intact?	<input checked="" type="checkbox"/> Yes	No	
Preservations documented on Chain of Custody?	<input checked="" type="checkbox"/> Yes	No	
Containers documented on Chain of Custody?	<input checked="" type="checkbox"/> Yes	No	
Sufficient sample amount for indicated test?	<input checked="" type="checkbox"/> Yes	No	
All samples received within sufficient hold time?	<input checked="" type="checkbox"/> Yes	No	
VOC samples have zero headspace?	<input checked="" type="checkbox"/> 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

COPY

MODEL NO: PGM 761S
 CALIBRATION GAS
 GAS COMPOSITION: ISOBUTYLENE
 AIR
 LOT NO: 04-2474
 EXP. DATE: 8-1-06
 METER READING
 ACCURACY: 100.0

SERIAL NO: 104412
 100 PPM
 BALANCE
 FILL DATE: 2-1-06
 ACCURACY: +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
VAC	Vent B-5-1 (Boot)	X B XP	25	18S	35E

Vertical @ Source Only

SAMPLE	PID RESULT	SAMPLE	PID RESULT
3'	0.0		
4'	0.0		
5'	0.0		
6'	0.0		
7'	0.0		
8'	0.0		

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

Ray R. Rascon
Signature

9-13-05
Date