

1R - 425-34

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, May 03, 2012 4:08 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 (1R425-34) Termination - ROC Vacuum Jct C-31-3 Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum Jct C-31-3 Site
Unit Letter C, Section 31, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-34) 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 27, 2012 (received May 1, 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 (1R425-34) 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 27, 2012

RECEIVED

MAY - 1 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 Jct. C-31-3 (1R425-34): UL/C, 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 C-31-3 junction box as part of the system abandonment. The site is located in UL/C, Sec. 33, 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 a 9x3x7-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 21 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 3/21/2006, 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

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		
							Length	Width	Depth
Vacuum	jct. C-31-3	C	31	17S	35E	Lea	no box—System Abandonment		

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

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

Date Started 7/19/2005 Date Completed 2/16/2006 NMOCD Witness no

Soil Excavated 7 cubic yards Excavation Length 9 Width 3 Depth 7 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 7/19/2005 Sample Depth 7 ft

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

CHLORIDE FIELD TESTS

Sample Location	PID (field) ppm	Total Hydrocarbon (C6-C35) mg/kg	Chloride mg/kg
GRAB @ 7 ft BGS	2.3	<10.0	21

LOCATION	DEPTH (ft)	ppm
vertical trench at junction	1	83
	2	80
	3	76
	4	70
	5	101
	6	77
	7	79

General Description of Remedial Action: This junction box was addressed as part of the Vacuum SWD System Abandonment. After the box was removed, a delineation trench was made at the junction using a backhoe to collect soil samples every vertical foot of depth.

Field tests for chloride and VOCs were conducted on each sample and both constituents were only detected in very low concentrations. A grab sample from the bottom of the trench (7 ft) was sent to a commercial laboratory for confirmation of the field tests. TPH was not present within the lab's detection limits, meeting OCD guidelines. The excavated soil was blended on site and then backfilled into the trench and contoured to the surrounding terrain. On 3/21/2006 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 Israel Juarez SIGNATURE *Israel Juarez* COMPANY RICE Operating Company

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE *Kristin Farris Pope*
DATE 10/3/2006 TITLE Project Scientist

Vacuum jct. C-31-3



box site prior to excavation; flagged stake in foreground 6/30/2005



beginning delineation trench 7/19/2005



delineation trench prior to backfill



seeding disturbed area at backfilled site 3/21/2006

E NVIRONMENTAL
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 Jct. C-31-3

Project Number: None Given

Location: None Given

Lab Order Number: 5G21003

Report Date: 07/26/05

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

Project: Vacuum Jct. C-31-3
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
07/26/05 08:12

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Vertical Grab@ 7'	SG21003-01	Soil	07/19/05 13:21	07/21/05 08:15

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

Project: Vacuum Jct. C-31-3
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
07/26/05 08:12

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Vertical Grab@ 7' (5G21003-01) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EG52111	07/21/05	07/23/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
<i>Surrogate: 1-Chlorooctane</i>		<i>81.6 %</i>	<i>70-130</i>		"	"	"	"	
<i>Surrogate: 1-Chlorooctadecane</i>		<i>80.6 %</i>	<i>70-130</i>		"	"	"	"	

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

Project: Vacuum Jct. C-31-3
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
07/26/05 08:12

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

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Vertical Grab@ 7' (5G21003-01) Soil									
Chloride	21.0	5.00	mg/kg	10	EG52512	07/23/05	07/23/05	EPA 300.0	
% Moisture	8.2	0.1	%	1	EG52107	07/21/05	07/22/05	% calculation	

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

Project: Vacuum Jct. C-31-3
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
07/26/05 08:12

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 EG52111 - Solvent Extraction (GC)

Blank (EG52111-BLK1)

Prepared: 07/21/05 Analyzed: 07/22/05

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	42.0		mg/kg	50.0		84.0	70-130			
Surrogate: 1-Chlorooctadecane	41.6		"	50.0		83.2	70-130			

LCS (EG52111-BS1)

Prepared: 07/21/05 Analyzed: 07/22/05

Gasoline Range Organics C6-C12	421	10.0	mg/kg wet	500		84.2	75-125			
Diesel Range Organics >C12-C35	440	10.0	"	500		88.0	75-125			
Total Hydrocarbon C6-C35	861	10.0	"	1000		86.1	75-125			
Surrogate: 1-Chlorooctane	50.8		mg/kg	50.0		102	70-130			
Surrogate: 1-Chlorooctadecane	42.2		"	50.0		84.4	70-130			

Calibration Check (EG52111-CCV1)

Prepared: 07/21/05 Analyzed: 07/23/05

Gasoline Range Organics C6-C12	486		mg/kg	500		97.2	80-120			
Diesel Range Organics >C12-C35	478		"	500		95.6	80-120			
Total Hydrocarbon C6-C35	964		"	1000		96.4	80-120			
Surrogate: 1-Chlorooctane	55.9		"	50.0		112	70-130			
Surrogate: 1-Chlorooctadecane	45.9		"	50.0		91.8	70-130			

Matrix Spike (EG52111-MS1)

Source: 5G21003-01

Prepared: 07/21/05 Analyzed: 07/22/05

Gasoline Range Organics C6-C12	474	10.0	mg/kg dry	545	ND	87.0	75-125			
Diesel Range Organics >C12-C35	512	10.0	"	545	ND	93.9	75-125			
Total Hydrocarbon C6-C35	986	10.0	"	1090	ND	90.5	75-125			
Surrogate: 1-Chlorooctane	53.9		mg/kg	50.0		108	70-130			
Surrogate: 1-Chlorooctadecane	44.8		"	50.0		89.6	70-130			

Matrix Spike Dup (EG52111-MSD1)

Source: 5G21003-01

Prepared: 07/21/05 Analyzed: 07/22/05

Gasoline Range Organics C6-C12	461	10.0	mg/kg dry	545	ND	84.6	75-125	2.78	20	
Diesel Range Organics >C12-C35	529	10.0	"	545	ND	97.1	75-125	3.27	20	
Total Hydrocarbon C6-C35	990	10.0	"	1090	ND	90.8	75-125	0.405	20	
Surrogate: 1-Chlorooctane	54.0		mg/kg	50.0		108	70-130			
Surrogate: 1-Chlorooctadecane	44.5		"	50.0		89.0	70-130			

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

Project: Vacuum Jct. C-31-3
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
07/26/05 08:12

**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 EG52107 - General Preparation (Prep)										
Blank (EG52107-BLK1)					Prepared: 07/21/05 Analyzed: 07/22/05					
% Moisture	ND	0.1	%							
Duplicate (EG52107-DUP1)					Source: 5G21001-01 Prepared: 07/21/05 Analyzed: 07/22/05					
% Moisture	23.1	0.1	%		19.4			17.4	20	
Batch EG52512 - Water Extraction										
Blank (EG52512-BLK1)					Prepared & Analyzed: 07/23/05					
Chloride	ND	0.500	mg/kg							
LCS (EG52512-BS1)					Prepared & Analyzed: 07/23/05					
Chloride	10.7		mg/L	10.0		107	80-120			
Calibration Check (EG52512-CCV1)					Prepared & Analyzed: 07/23/05					
Chloride	10.6		mg/L	10.0		106	80-120			
Duplicate (EG52512-DUP1)					Source: 5G20024-02 Prepared & Analyzed: 07/23/05					
Chloride	1390	25.0	mg/kg		1380			0.722	20	

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

Project: Vacuum Jct. C-31-3
Project Number: None Given
Project Manager: Roy Rascon

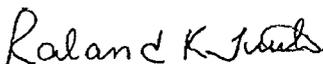
Fax: (505) 397-1471

Reported:
07/26/05 08:12

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:

7/26/2005

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

The results in this report apply to the samples analyzed in accordance with the samples received in the laboratory. This analytical report must be reproduced in its entirety, with written approval of Environmental Lab of Texas.

Page 6 of 6

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

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

Client: Rice

Date/Time: 7/21/05 8:15

Order #: EG21003

Initials: CR

Sample Receipt Checklist

Temperature of container/cooler?	Yes	No	LS 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

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

SERIAL NO: 104412

LOT NO: 04-2747
EXP. DATE: 8-1-06
METER READING
ACCURACY: 100.7

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

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
Vacuum	C-31-3	C	31	17S	35E

SAMPLE	PID RESULT	SAMPLE	PID RESULT
At Surface 1'	46.1		
2'	8.3		
3'	44.8		
4'	27.2		
5'	3.3		
6'	1.5		
Vertical Grab @ 7'	2.3		
COPY			

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

Signature *Dr Rafferty*

Date 7/19/05