

1R - 425-32

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, May 03, 2012 3:36 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 (1R425-32) Termination - ROC Vacuum K-35 Vent Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum K-35 Vent Site
Unit Letter K, Section 35, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-32) 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 (1R425-32) 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 K-35 vent (1R425-32): UL/K, Sec. 35, 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 K-35 vent junction box as part of the system abandonment. The site is located in UL/K, Sec. 35, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 52 +/- 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 194 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 2/22/2006, 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 NMOCDC

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	K-35 vent	K	35	17S	35E	Lea	no box--System Abandonment		

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

Depth to Groundwater 52 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 8/12/2005 Date Completed 2/17/2006 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 8/12/2005 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	0.1	<10.0	194

LOCATION	DEPTH (ft)	ppm
delineation trench at junction box site	2	120
	3	203
	4	214
	5	258
	6	326
	7	232

General Description of Remedial Action: This junction box site was addressed

as part of the Vacuum SWD System Abandonment. After the box was removed, the site was delineated using a backhoe to collect soil samples at regular intervals to a depth of 7 ft. Chloride field tests and PID readings were conducted on all of the samples. Concentrations of both constituents were very low. A sample from the bottom of the trench was analyzed by a laboratory for confirmation of field tests. The excavated soil was blended on site and then backfilled into the trench and contoured to the surrounding terrain. The disturbed surface was seeded with a blend of native vegetation on 2/22/2006 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 9/19/2006 TITLE Project Scientist

Vacuum K-35 vent



junction box prior to excavation

7/11/2005



beginning delineation trench at former jct. site

8/12/2005

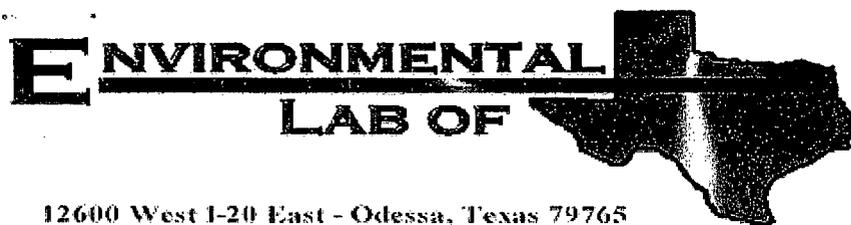


spreading imported topsoil on backfilled site



raking seed

2/22/2006



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 Vent K-35

Project Number: None Given

Location: None Given

Lab Order Number: 5H15002

Report Date: 08/19/05

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

Project: Vacuum Vent K-35
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
08/19/05 15:04

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Bottom Grab Sample @ 7'	5H15002-01	Soil	08/12/05 10:15	08/12/05 17:45

Rice Operating Co. 122 W. Taylor Hobbs NM, 88240	Project: Vacuum Vent K-35 Project Number: None Given Project Manager: Roy Rascon	Fax: (505) 397-1471 Reported: 08/19/05 15:04
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Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Bottom Grab Sample @ 7' (5H15002-01) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EH51502	08/15/05	08/15/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
<i>Surrogate: 1-Chlorooctane</i>		<i>101 %</i>	<i>70-130</i>		"	"	"	"	
<i>Surrogate: 1-Chlorooctadecane</i>		<i>118 %</i>	<i>70-130</i>		"	"	"	"	

Rice Operating Co. 122 W. Taylor Hobbs NM, 88240	Project: Vacuum Vent K-35 Project Number: None Given Project Manager: Roy Rascon	Fax: (505) 397-1471 Reported: 08/19/05 15:04
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**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 @ 7' (5H15002-01) Soil									
Chloride	194	5.00	mg/kg	10	EH51905	08/19/05	08/19/05	EPA 300.0	
% Moisture	7.9	0.1	%	1	EH51504	08/15/05	08/15/05	% calculation	

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

Project: Vacuum Vent K-35
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
08/19/05 15:04

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 EH51502 - Solvent Extraction (GC)										
Blank (EH51502-BLK1) Prepared & Analyzed: 08/15/05										
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	48.4		mg/kg	50.0		96.8	70-130			
Surrogate: 1-Chlorooctadecane	55.4		"	50.0		111	70-130			
LCS (EH51502-BS1) Prepared & Analyzed: 08/15/05										
Gasoline Range Organics C6-C12	420	10.0	mg/kg wet	500		84.0	75-125			
Diesel Range Organics >C12-C35	457	10.0	"	500		91.4	75-125			
Total Hydrocarbon C6-C35	877	10.0	"	1000		87.7	75-125			
Surrogate: 1-Chlorooctane	49.1		mg/kg	50.0		98.2	70-130			
Surrogate: 1-Chlorooctadecane	49.6		"	50.0		99.2	70-130			
Calibration Check (EH51502-CCV1) Prepared & Analyzed: 08/15/05										
Gasoline Range Organics C6-C12	453		mg/kg	500		90.6	80-120			
Diesel Range Organics >C12-C35	472		"	500		94.4	80-120			
Total Hydrocarbon C6-C35	925		"	1000		92.5	80-120			
Surrogate: 1-Chlorooctane	52.6		"	50.0		105	0-200			
Surrogate: 1-Chlorooctadecane	56.1		"	50.0		112	0-200			
Matrix Spike (EH51502-MS1) Source: 5H15006-01 Prepared & Analyzed: 08/15/05										
Gasoline Range Organics C6-C12	527	10.0	mg/kg dry	613	ND	86.0	75-125			
Diesel Range Organics >C12-C35	660	10.0	"	613	90.0	93.0	75-125			
Total Hydrocarbon C6-C35	1190	10.0	"	1230	90.0	89.4	75-125			
Surrogate: 1-Chlorooctane	51.3		mg/kg	50.0		103	70-130			
Surrogate: 1-Chlorooctadecane	52.0		"	50.0		104	70-130			
Matrix Spike Dup (EH51502-MSD1) Source: 5H15006-01 Prepared & Analyzed: 08/15/05										
Gasoline Range Organics C6-C12	511	10.0	mg/kg dry	613	ND	83.4	75-125	3.08	20	
Diesel Range Organics >C12-C35	627	10.0	"	613	90.0	87.6	75-125	5.13	20	
Total Hydrocarbon C6-C35	1140	10.0	"	1230	90.0	85.4	75-125	4.29	20	
Surrogate: 1-Chlorooctane	51.2		mg/kg	50.0		102	70-130			
Surrogate: 1-Chlorooctadecane	57.6		"	50.0		115	70-130			

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.

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

Project: Vacuum Vent K-35
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
08/19/05 15:04

**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 EH51504 - General Preparation (Prep)										
Blank (EH51504-BLK1)					Prepared & Analyzed: 08/15/05					
% Solids	100		%							
Duplicate (EH51504-DUP1)					Source: 5H12003-01 Prepared & Analyzed: 08/15/05					
% Solids	70.6		%		72.0			1.96	20	
Duplicate (EH51504-DUP2)					Source: 5H15007-01 Prepared & Analyzed: 08/15/05					
% Solids	96.8		%		96.9			0.103	20	
Batch EH51905 - Water Extraction										
Blank (EH51905-BLK1)					Prepared & Analyzed: 08/19/05					
Chloride	ND	0.500	mg/kg							
LCS (EH51905-BS1)					Prepared & Analyzed: 08/19/05					
Chloride	8.49		mg/L	10.0		84.9	80-120			
Calibration Check (EH51905-CCV1)					Prepared & Analyzed: 08/19/05					
Chloride	8.88		mg/L	10.0		88.8	80-120			
Duplicate (EH51905-DUP1)					Source: 5H15002-01 Prepared & Analyzed: 08/19/05					
Chloride	203	5.00	mg/kg		194			4.53	20	

Report Approved By: Raland K Tuttle Date: 8/19/2005

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.

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Environmental Lab of Texas

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

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

Project: Vacuum Vent K-35
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
08/19/05 15:04

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

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

Client: Ricc Op.
 Date/Time: 8/12/05 17:45
 Order #: SH15002
 Initials: CK

Sample Receipt Checklist

Temperature of container/cooler?	Yes	No	0.5 C
Shipping container/cooler in good condition?	<input checked="" type="checkbox"/>	No	
Custody Seals intact on shipping container/cooler?	<input checked="" type="checkbox"/>	No	Not present
Custody Seals intact on sample bottles?	<input checked="" type="checkbox"/>	No	Not present
Chain of custody present?	<input checked="" type="checkbox"/>	No	
Sample Instructions complete on Chain of Custody?	<input checked="" type="checkbox"/>	No	
Chain of Custody signed when relinquished and received?	<input checked="" type="checkbox"/>	No	
Chain of custody agrees with sample label(s)	<input checked="" type="checkbox"/>	No	
Container labels legible and intact?	<input checked="" type="checkbox"/>	No	
Sample Matrix and properties same as on chain of custody?	<input checked="" type="checkbox"/>	No	
Samples in proper container/bottle?	<input checked="" type="checkbox"/>	No	
Samples properly preserved?	<input checked="" type="checkbox"/>	No	
Sample bottles intact?	<input checked="" type="checkbox"/>	No	
Preservations documented on Chain of Custody?	<input checked="" type="checkbox"/>	No	- -
Containers documented on Chain of Custody?	<input checked="" type="checkbox"/>	No	
Sufficient sample amount for indicated test?	<input checked="" type="checkbox"/>	No	
All samples received within sufficient hold time?	<input checked="" type="checkbox"/>	No	
VOC samples have zero headspace?	<input checked="" type="checkbox"/>	No	Not Applicable

Other observations:

Variance Documentation:

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

Corrective Action Taken:

