1R - 425-35

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, May 07, 2012 3:28 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 (1R425-35) Termination - ROC Vacuum Jct I-29 Site

RE: Termination Request
for the Rice Operating Company's
Vacuum Jct I-29 Site
Unit Letter I, Section 29, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-35) 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 (1R425-35) 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
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. I-29 (1R425-35): UL/I, Sec. 29, 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 I-29 junction box as part of the system abandonment. The site is located in UL/I, Sec. 29, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 100 +/- feet. After the former junction box was removed, soil samples were collected at regular intervals using a hand auger to a depth of 8-ft below ground surface (bgs). Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in low concentrations of each. Representative samples were sent to a commercial for analysis of chloride and TPH, resulting in a 4-WALL chloride concentration of 154 mg/kg, a gasoline range organics (GRO) concentration below detectable limits, and a diesel range organics (DRO) concentration of 158 mg/kg. The bottom composite resulted in a chloride concentration of 81.2 mg/kg, a GRO concentration below detectable limits, and a DRO concentration of 187 mg/kg. The backfill resulted in a chloride concentration of 141 mg/kg, a GRO concentration below detectable limits, and a DRO concentration of 229 mg/kg. The 13x4x8-ft deep excavation was then backfilled with clean, imported topsoil and contoured to the surrounding area. On 9/14/2006, 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

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. I-29	I	29	17S	35E	Lea	no box--System Abandonment		

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

Depth to Groundwater 100 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 11/4/2005 Date Completed 8/24/2006 NMOCD Witness no

Soil Excavated 15 cubic yards Excavation Length 13 Width 4 Depth 8 feet

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

FINAL ANALYTICAL RESULTS:

Sample Date 11/4/2005 **Sample Depth** 8 ft

5-point composite sample of bottom and 4-point composite sample of excavation sidewalls. TPH and chloride laboratory test results completed by using an approved laboratory and testing procedures pursuant to NMOCD guidelines.

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
4-WALL COMP.	1.2	<10.0	158	154
BOTTOM COMP.	1.1	<10.0	187	81.2
BACKFILL	1.1	<10.0	229	141

CHLORIDE FIELD TESTS

LOCATION	DEPTH (ft)	ppm
4-wall comp.	n/a	25.5
bottom comp.	8	107
background	1	114

General Description of Remedial Action:

This junction box was addressed as part of the Vacuum SWD System abandonment. After the junction box lumber was removed, samples were collected from the resulting hole using a hand auger. These samples were field tested for chloride and VOCs. Chloride concentrations were very low and similar to background level. PID readings also exhibited insignificant VOC concentrations. Composite samples from the hole were analyzed at a commercial laboratory for confirmation of the field tests. The 13 x 4 x 8-ft-deep hole was backfilled with clean, imported topsoil. This topsoil was seeded with a blend of native vegetation on 9/14/2006 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.

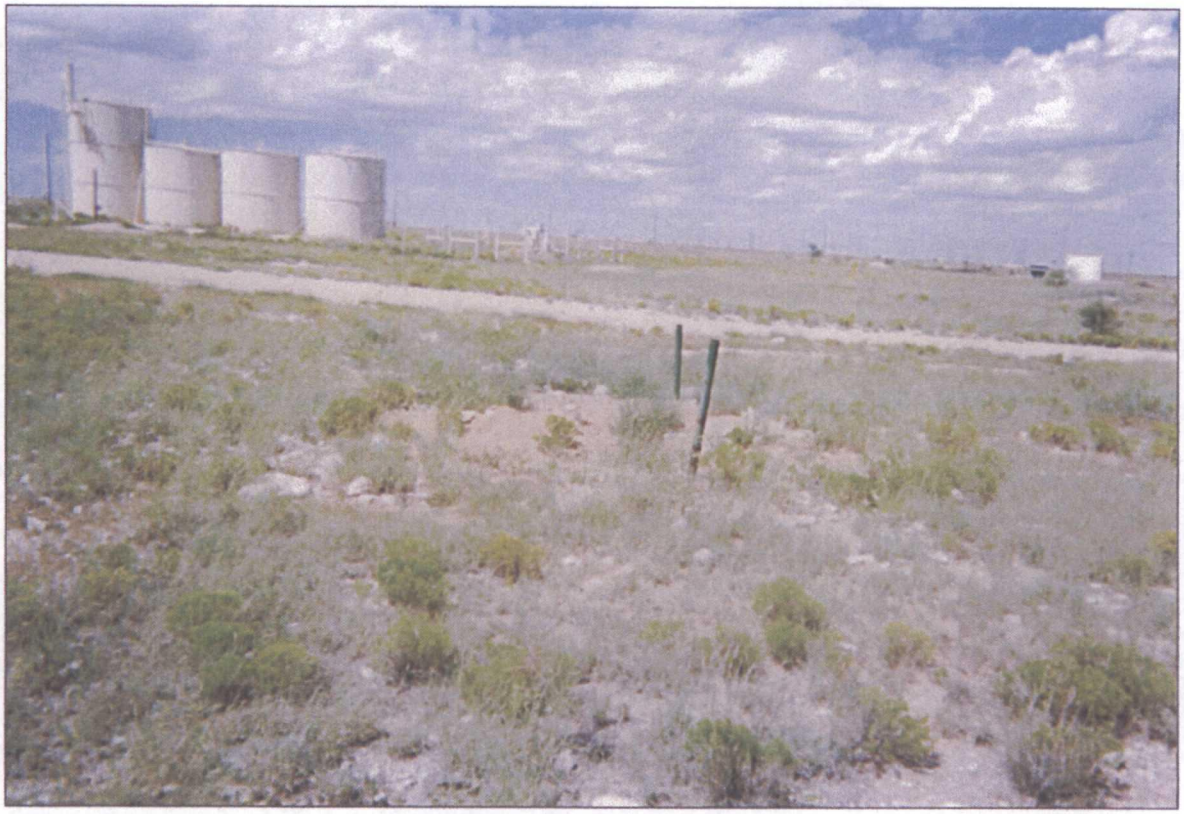
SITE SUPERVISOR Kevin Collins SIGNATURE not available COMPANY RICE Operating Company

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE Kristin Farris Pope

DATE 9/20/2006 TITLE Project Scientist

Vacuum jct. I-29

Open box hole from which hand-auger samples were collected 9/26/2005



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. I-29

Project Number: None Given

Location: None Given

Lab Order Number: 5K07003

Report Date: 11/21/05

Rice Operating Co.	Project: Vacuum Jct. I-29	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	11/21/05 09:11

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Bottom Comp. – 8'	5K07003-01	Soil	11/04/05 07:50	11/04/05 17:00
4 Wall Comp. 13' X 14'	5K07003-02	Soil	11/04/05 07:55	11/04/05 17:00
Backfill Comp.	5K07003-03	Soil	11/04/05 07:45	11/04/05 17:00

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

Rice Operating Co.	Project: Vacuum Jct. I-29	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	11/21/05 09:11

Organics by GC

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Bottom Comp. (5K07003-01) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EK50801	11/08/05	11/08/05	EPA 8015M	
Diesel Range Organics >C12-C35	**187**	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	**187**	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*86.6 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*87.8 %*	*70-130*		"	"	"	"	
4 Wall Comp. (5K07003-02) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EK50801	11/08/05	11/08/05	EPA 8015M	
Diesel Range Organics >C12-C35	**158**	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	**158**	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*85.0 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*93.8 %*	*70-130*		"	"	"	"	
Backfill Comp. (5K07003-03) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EK50801	11/08/05	11/08/05	EPA 8015M	
Diesel Range Organics >C12-C35	**229**	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	**229**	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*75.0 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*81.2 %*	*70-130*		"	"	"	"	

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Rice Operating Co.	Project: Vacuum Jct. 1-29	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	11/21/05 09:11

General Chemistry Parameters by EPA / Standard Methods

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Bottom Comp. (5K07003-01) Soil									
Chloride	**81.2**	10.0	mg/kg	20	EK51007	11/08/05	11/10/05	EPA 300.0	
% Moisture	**2.5**	0.1	%	1	EK50802	11/07/05	11/08/05	% calculation	
4 Wall Comp. (5K07003-02) Soil									
Chloride	**154**	10.0	mg/kg	20	EK51007	11/08/05	11/10/05	EPA 300.0	
% Moisture	**1.6**	0.1	%	1	EK50802	11/07/05	11/08/05	% calculation	
Backfill Comp. (5K07003-03) Soil									
Chloride	**141**	10.0	mg/kg	20	EK51007	11/08/05	11/10/05	EPA 300.0	
% Moisture	**5.5**	0.1	%	1	EK50802	11/07/05	11/08/05	% calculation	

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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 EK50801 - Solvent Extraction (GC)										
Blank (EK50801-BLK1)				Prepared & Analyzed: 11/08/05						
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	*63.7*		*mg/kg*	*50.0*		*127*	*70-130*			
Surrogate: 1-Chlorooctadecane	*64.5*		"	*50.0*		*129*	*70-130*			
LCS (EK50801-BS1)				Prepared & Analyzed: 11/08/05						
Gasoline Range Organics C6-C12	390	10.0	mg/kg wet	500		78.0	75-125			
Diesel Range Organics >C12-C35	471	10.0	"	500		94.2	75-125			
Total Hydrocarbon C6-C35	862	10.0	"	1000		86.2	75-125			
Surrogate: 1-Chlorooctane	*53.3*		*mg/kg*	*50.0*		*107*	*70-130*			
Surrogate: 1-Chlorooctadecane	*52.1*		"	*50.0*		*104*	*70-130*			
Calibration Check (EK50801-CCV1)				Prepared & Analyzed: 11/08/05						
Gasoline Range Organics C6-C12	428		mg/kg	500		85.6	80-120			
Diesel Range Organics >C12-C35	482		"	500		96.4	80-120			
Total Hydrocarbon C6-C35	910		"	1000		91.0	80-120			
Surrogate: 1-Chlorooctane	*47.7*		"	*50.0*		*95.4*	*70-130*			
Surrogate: 1-Chlorooctadecane	*44.5*		"	*50.0*		*89.0*	*70-130*			
Matrix Spike (EK50801-MS1)	**Source: 5K07002-02**			Prepared & Analyzed: 11/08/05						
Gasoline Range Organics C6-C12	524	10.0	mg/kg dry	585	ND	89.6	75-125			
Diesel Range Organics >C12-C35	513	10.0	"	585	ND	87.7	75-125			
Total Hydrocarbon C6-C35	1040	10.0	"	1170	ND	88.9	75-125			
Surrogate: 1-Chlorooctane	*49.0*		*mg/kg*	*50.0*		*98.0*	*70-130*			
Surrogate: 1-Chlorooctadecane	*45.3*		"	*50.0*		*90.6*	*70-130*			
Matrix Spike Dup (EK50801-MSD1)	**Source: 5K07002-02**			Prepared & Analyzed: 11/08/05						
Gasoline Range Organics C6-C12	547	10.0	mg/kg dry	585	ND	93.5	75-125	4.30	20	
Diesel Range Organics >C12-C35	527	10.0	"	585	ND	90.1	75-125	2.69	20	
Total Hydrocarbon C6-C35	1070	10.0	"	1170	ND	91.5	75-125	2.84	20	
Surrogate: 1-Chlorooctane	*52.8*		*mg/kg*	*50.0*		*106*	*70-130*			
Surrogate: 1-Chlorooctadecane	*44.8*		"	*50.0*		*89.6*	*70-130*			

Rice Operating Co.	Project: Vacuum Jct. I-29	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	11/21/05 09:11

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 EK50802 - General Preparation (Prep)										
Blank (EK50802-BLK1)				Prepared: 11/07/05 Analyzed: 11/08/05						
% Solids	100		%							
Duplicate (EK50802-DUP1)	**Source: 5K07002-01**			Prepared: 11/07/05 Analyzed: 11/08/05						
% Solids	88.3		%		88.1			0.227	20	
Batch EK51007 - Water Extraction										
Blank (EK51007-BLK1)				Prepared: 11/08/05 Analyzed: 11/10/05						
Chloride	ND	0.500	mg/kg							
LCS (EK51007-BS1)				Prepared: 11/08/05 Analyzed: 11/10/05						
Chloride	9.01		mg/L	10.0		90.1	80-120			
Calibration Check (EK51007-CCV1)				Prepared: 11/08/05 Analyzed: 11/10/05						
Chloride	8.66		mg/L	10.0		86.6	80-120			
Duplicate (EK51007-DUP1)	**Source: 5J25007-12**			Prepared: 11/08/05 Analyzed: 11/10/05						
Chloride	3660	50.0	mg/kg		3680			0.545	20	

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Rice Operating Co.	Project: Vacuum Jct. I-29	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	11/21/05 09:11

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: 11/21/2005

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.

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 I-29
Project #:
Project Loc:
PO #:

5K07003

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: / CLJ	Analyze For: TOTAL: 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	IEC, CEC, SAR, ESP	Major cations/anions, TDS					RUSH TAT (Pre-Schedule)	Standard TAT
-01	Bottom Comp	11/04/05	0750	1	✓									✓		✓			✓												
-02	4 Wall Comp	11/04/05	0755	1	✓									✓		✓			✓												
-03	Backfill Comp	11/04/05	0745	1	✓									✓		✓			✓												

Special Instructions:

Sample Containers Intact? Y N
Temperature Upon Receipt: 2.5
Laboratory Comments: Seals/Labels 402

Relinquished by:	Date	Time	Received by:	Date	Time
	11/4/05	1:00P		11/4	1430
Relinquished by:	Date	Time	Received by ELOT:	Date	Time
	11/4	17:00		11/4/05	17:00

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

Client: Rice Op.

Date/Time: 11/4/05 17:00

Order #: 5K07003

Initials: CK

Sample Receipt Checklist

Temperature of container/cooler?	Yes	No	2.5 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~~ 104490
CALIBRATION GAS
GAS COMPOSITION: ISOBUTYLENE 100 PPM
AIR BALANCE
LOT NO: 05-2859 FILL DATE: 07/19/05
EXP. DATE: 1/19/05 ACCURACY: ± 2%
METER READING
ACCURACY: 100

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
VACUUM	I-29	I	29	17S	37E

SAMPLE	PID RESULT	SAMPLE	PID RESULT
8' Original Bell	1.1		
2/4 wall comp	1.2		
Back fill	1.1		

COPY

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

Signature — Date: 11/04/05

Kevin Collins