1R - 425-18

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, May 08, 2012 4:28 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 (1R425-18) Termination - ROC Vacuum Jct G-33 Site

RE: Termination Request
for the Rice Operating Company's
Vacuum Jct G-33 Site
Unit Letter G, Section 33, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-18) 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 17, 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 (1R425-18) 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 17, 2012

RECEIVED
APR 20 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. G-33 (1R425-18): UL/G, Sec. 33, 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 G-33 junction box as part of the system abandonment. The site is located in UL/G, Sec. 33, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 83 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating an 8x3x6-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 6-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 67.1 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. A sample of the remediated backfill was collected for commercial laboratory analysis, resulting in a chloride concentration of 459 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. On 11/23/2005, 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. G-33	G	33	17S	35E	Lea	no box--System abandoned		

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

Depth to Groundwater 83 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 9/13/2005 Date Completed 11/21/2005 NMOCD Witness no

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

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

FINAL ANALYTICAL RESULTS: **Sample Date** 9/13/2005 **Sample Depth** 6 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 lab and testing procedures pursuant to NMOCD guidelines.

Sample Location	PID ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
GRAB @ 6 ft BGS	0.0	<10.0	<10.0	67.1
REMED. BACKFILL	0.0	<10.0	<10.0	459

CHLORIDE FIELD TESTS

LOCATION	DEPTH (ft)	ppm
delineation trench at junction	2	577
	3	830
	4	275
	5	122
	6	108
backfill	n/a	717
background	surface	72

General Description of Remedial Action:

This junction box was addressed as part of the Vacuum SWD System abandonment. A delineation trench was made at the junction to 6 ft BGS using a backhoe. Soil samples were collected every vertical ft of depth from 2 to 6 ft. Chloride field tests were conducted on these samples and yielded a conclusive trend of decline with depth, indicative of non-saturated vadose conditions. The laboratory analysis of the 6 ft sample confirmed the low concentration of 67.1 ppm, similar to background level. PID screenings performed on the soil samples were all 0.0 ppm and there were no indications of hydrocarbon impact. TPH was not present in detectable concentrations (<10.0 ppm), meeting NMOCD guidelines. The excavated soil was blended on site and then backfilled into the trench. The disturbed surface was seeded with a blend of native vegetation and is expected to return to productive capacity at a normal rate. Because the SWD System is no longer active, a new junction box is not required.

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

Vacuum jct. G-33

undisturbed junction box (facing south) 9/13/2005

box removed; prior to excavation (facing south) 9/13/2005

delineation trench at former junction box site 9/13/2005

seeding disturbed surface after backfill 11/23/2005

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

Project: Vacuum Jct. G-33
Project Number: None Given
Location: None Given

Lab Order Number: 5I15003

Report Date: 09/20/05

Rice Operating Co.	Project: Vacuum Jct. G-33	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	09/20/05 12:39

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Blended Backfill Comp.	5I15003-01	Soil	09/13/05 09:39	09/15/05 07:40
Vert@ 6' Grab	5I15003-02	Soil	09/13/05 00:00	09/15/05 07:40

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

Rice Operating Co.	Project: Vacuum Jct. G-33	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	Reported:
Hobbs NM, 88240	Project Manager: Roy Rascon	09/20/05 12:39

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Blended Backfill Comp. (5I15003-01) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EI51514	09/15/05	09/16/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*81.8 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*108 %*	*70-130*		"	"	"	"	
Vert@ 6' Grab (5I15003-02) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EI51514	09/15/05	09/16/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*80.2 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*102 %*	*70-130*		"	"	"	"	

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Rice Operating Co.	Project: Vacuum Jct. G-33	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	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
Blended Backfill Comp. (5I15003-01) Soil									
Chloride	**459**	10.0	mg/kg	20	EI51603	09/15/05	09/15/05	EPA 300.0	
% Moisture	**6.1**	0.1	%	1	EI51609	09/15/05	09/16/05	% calculation	
Vert@ 6' Grab (5I15003-02) Soil									
Chloride	**67.1**	5.00	mg/kg	10	EI51603	09/15/05	09/15/05	EPA 300.0	
% Moisture	**5.7**	0.1	%	1	EI51609	09/15/05	09/16/05	% 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 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*			

Rice Operating Co.	Project: Vacuum Jct. G-33	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	Reported:
Hobbs NM, 88240	Project Manager: Roy Rascon	09/20/05 12:39

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	

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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: 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.

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: Ray Rascon
Company Name: RICE Operating
Company Address: 122 W. Taylor
City/State/Zip: Hobbs, NM 88240
Telephone No: (505) 393-9174 Fax No: (505) 397-1471
Sampler Signature: Ray R. Rascon

Project Name: VAC JCT G-33
Project #: ———
Project Loc:
PO #:

Analyze For:

LAB # (lab use only)	FIELD CODE	Date Sampled	Time Sampled	No. of Containers	Preservative: Ice	HNO3	HCl	NaOH	H2SO4	None	Other (Specify)	Matrix: Water	Sludge	Soil	Other (specify)	TCLP: TDS/(CL) SAR / EC	TPH 418.1	TPH TX 1005/1006	TOTAL: TPH 8015M GRO/DRO	Metals: As Ag Ba Cd Cr Pb Hg Se	Volatiles	Semivolatiles	BTEX 8021B/5030	RUSH TAT (Pre-Schedule)
5-11003 -01	Blended Backfill Comp.	9-13-05	0939	1	✓									✓		✓			✓					
-02	Vert. @ 6' Grab			1	✓									✓		✓			✓					

Special Instructions:

Sample Containers Intact? (Y) N
Temperature Upon Receipt: Labels of out seals
Laboratory Comments: Rec 3.5°C

Relinquished by:	Date	Time	Received by:	Date	Time
Ray R. Rascon	9-13-05	3:15P		9/14	18:00
Relinquished by:	Date	Time	Received by ELOT:	Date	Time
	9/15	7:40		9/15/05	0740

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

Client: Rice Operating

Date/Time: 9-15-05 - 0740

Order #: EF15003

Initials: LT

Sample Receipt Checklist

Temperature of container/cooler?	(Yes)	No	3.5 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 CO.

122 West Tayor
Hobbs, New Mexico 88240
Phone: (505) 393 - 9174 FAX (505) 397 - 1471

VOC FIELD CALIBRATION REPORT FORM

Mini RAE Plus Classic Photoionization Gas Detector
Model NO: PGM 761S Serial NO: 104412

Calibration Gas Composition: Isobutylene 100ppm / Air Balance

Lot NO.: 04-~~2747~~ RRR

Experation Date: 8-1-06 Fill Date: 2-1-05

Calibration Gas Accuracy: +/- 2% Meter Reading Accuracy: 100.0

System	Junction	Unit	Section	Township	Range
VAC	G-33	G	33	17S	35E

Vert. @ Source only

Sample Depth	PID Results	Sample Depth	PID Results
1'		Blended Backfill	0.0
2'	0.0	Surface	0.0
3'	0.0		
4'	0.0		
5'	0.0		
6'	0.0		
7'			
8'			
9'			
10'			
11'			
12'			

COPY

I verify that I have calibrated the above instrument in accordance to the manufacturer operations manuel.

Signature: Roy R. Rascon Date: 9-13-05