1R - 425-19

APPROVALS

YEAR(S):

2012

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 Southwestern "VC" EOL (1R425-19): UL/L, Sec. 36, 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 Southwestern "VC" EOL junction box as part of the system abandonment. The site is located in UL/L, Sec. 36, 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 an 8x3x12-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 12-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 79.2 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The excavated soil was returned to the excavation to ground surface and contoured to the surrounding area. 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	Southwestern "VC" EOL	L	36	17S	35E	Lea	none--System abandonment		

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

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

Date Started 8/11/2005 Date Completed 11/23/2005 NMOCD Witness no

Soil Excavated 10.6 cubic yards Excavation Length 8 Width 3 Depth 12 feet

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

FINAL ANALYTICAL RESULTS: **Sample Date** 8/11/2005 **Sample Depth** 12 ft

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 @ 12 ft BGS	0.3	<10.0	<10.0	79.2

CHLORIDE FIELD TESTS

LOCATION	DEPTH (ft)	ppm
vertical trench at junction box	1	4391
	2	1721
	3	193
	4	227
	5	257
	6	285
	7	294
	8	446
	9	367
	10	280
	11	357
	12	304

General Description of Remedial Action: This end-of-line (EOL) junction box was abandoned with the Vacuum SWD System abandonment. After NORM decontamination, the box lumber was removed and a delineation trench was made at the former junction site using a backhoe. Chloride field tests and PID screenings were performed on soil samples collected from the trench every vertical foot of depth to 12 ft BGS. Chloride concentrations exhibited a conclusive trend of decline with depth and all PID levels were well below 100 ppm. Laboratory analysis on the 12-ft sample yielded TPH concentrations below detection limits (<10 mg/kg), meeting NMOCD guidelines. The trench was backfilled with the excavated soil and leveled to the surrounding surface. The disturbed surface was seeded with a blend of native vegetation and is expected to return to productive capacity at a normal rate.

enclosures: chloride graph, 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 12-7-2005 TITLE Project Scientist

Vacuum Southwestern VC EOL

Unit 'L', Sec. 36, T17S, R35E

undisturbed junction box 6/30/2005

delineation trench at former junction box site 8/11/2005

backfilling delineation trench 11/21/2005

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 Southwestern VC EOL
Project Number: None Given
Location: None Given

Lab Order Number: 5H15003

Report Date: 08/19/05

Rice Operating Co.	Project: Vacuum Southwestern VC EOL	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	08/19/05 09:49

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Bottom Grab Sample @ 12'	5H15003-01	Soil	08/11/05 14:45	08/12/05 17:45

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

Rice Operating Co.	Project: Vacuum Southwestern VC EOL	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	08/19/05 09:49

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Bottom Grab Sample @ 12' (5H15003-01) 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	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*94.8 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*111 %*	*70-130*		"	"	"	"	

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

Rice Operating Co.	Project: Vacuum Southwestern VC EOL	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	08/19/05 09:49

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 @ 12' (5H15003-01) Soil									
Chloride	**79.2**	5.00	mg/kg	10	EH51905	08/19/05	08/19/05	EPA 300.0	
% Moisture	**8.2**	0.1	%	1	EH51504	08/15/05	08/15/05	% calculation	

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

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*			

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	

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: 8-19-05

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: 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 Southwestern VC Eol
Project #:
Project Loc:
PO #:

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: / CL /	Analyze For: TOTAL: / CL /	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	EC, CEC, SAR, ESP	Major cations/anions, TDS	RUSH TAT (Pre-Schedule)	Standard TAT
5H15003 -01	Bottom Grab Sample @ 12'	8-11-05	2:45	1	X									X		X				X								

Special Instructions:

Sample Containers Intact? (Y) N
Temperature Upon Receipt:
Laboratory Comments: 0.5 °C

4oz glass on ice w/ labels + seals
seal on cooler

Relinquished by:	Date	Time	Received by:	Date	Time
	8-11-05			8/12	15:00
Relinquished by:	Date	Time	Received by ELOT:	Date	Time
	8/12	17:45		8-12-05	1745

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

Client: Rice OP.

Date/Time: 8/12/05 17:45

Order #: 5H15003

Initials: CR

Sample Receipt Checklist

Temperature of container/cooler?	Yes	No	0.5 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

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

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

SERIAL NO: 104412

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

SYSTEM	JUNCION	UNIT	SECTION	TOWNSHIP	RANGE
Vacuum	Southwestern VC EOL	L	36	17S	35E

SAMPLE	PID RESULT	SAMPLE	PID RESULT
@ Source 1'	41.4	Grab Bottom Sample @ 12'	0.3 ← lab sample
2'	43.0		
3'	48.0		
4'	36.1		
5'	27.2		
6'	20.6		
7'	11.0		
8'	0.9		
9'	0.1		
10'	0.7		
11'	0.3		
12'	0.1		

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

Signature _____ Date 8-11-05

Hansen, Edward J., EMNRD

From: Laura Pena <lpena@riceswd.com>
Sent: Thursday, May 10, 2012 8:48 AM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder; Katie Jones
Subject: Vacuum Southwestern 'VC' EOL (1R425-19) Photo Documentation
Attachments: Southwestern 'VC' EOL (1R425-19) Site Photo Documentation.pdf

Mr. Hansen,

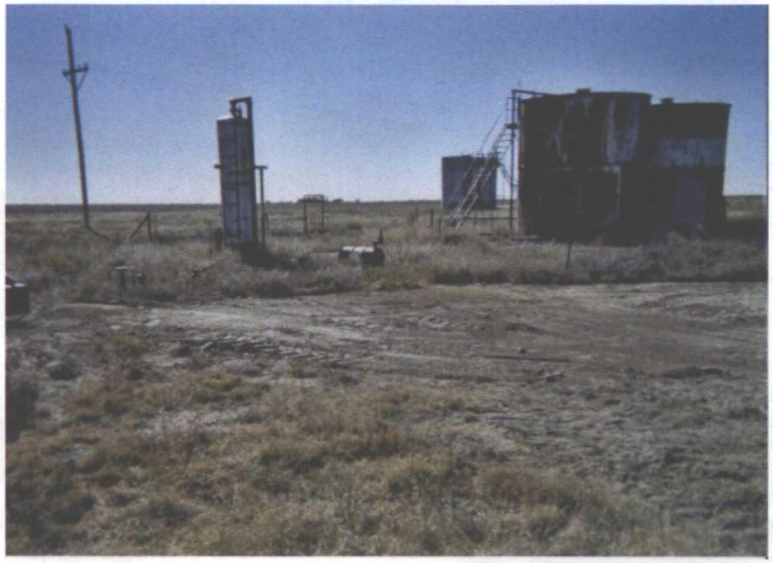
Hack asked me to send you the photo documentation of the Vacuum Southwestern 'VC' EOL (1R425-19) site. Attached you will find photos of the site after the completion of the excavation in 2005 and photos of the site in 2012.

The excavated area does have vegetation; however, please note that the tanks present in the 2005 photos have been removed. Those areas do not exhibit signs of vegetation (locations are marked on the current photographs).

If you have any questions, please contact Hack Conder at (575)631-6432.

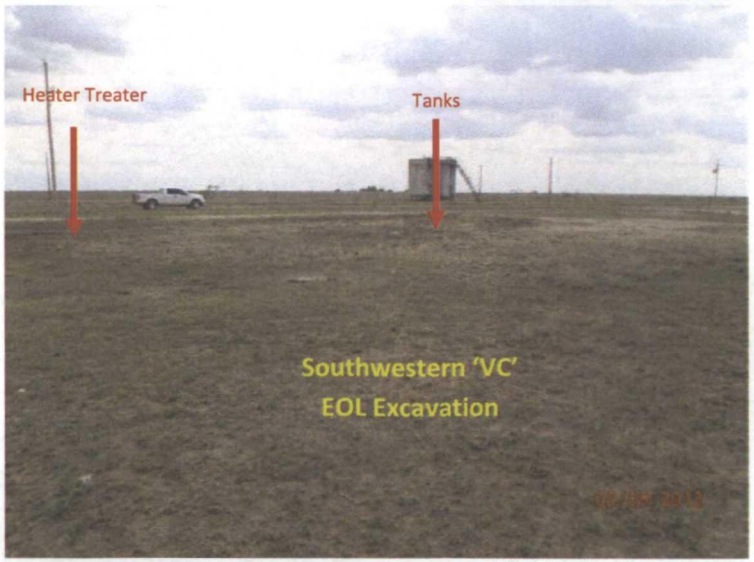
Thank you,
Laura Peña

Southwestern 'VC' EOL (1R425-19)
Unit L, Sec. 36, T17S, R35E

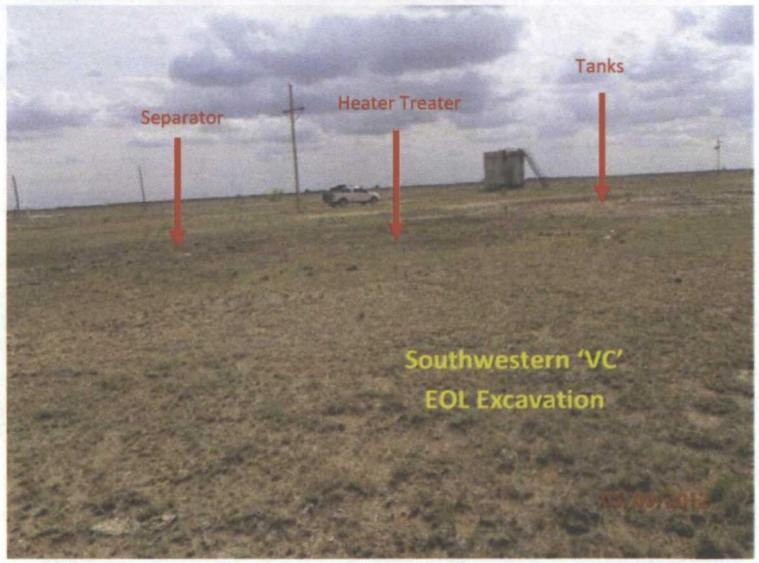


Facing south 11/23/2005

Facing east 11/23/2005



Facing south 5/9/2012



Facing south 5/9/2012