

1R - 425.52

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, May 15, 2012 1:42 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 (1R425-52) Termination - ROC Vacuum M-33 Vent Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum M-33 Vent Site
Unit Letter M, Section 33, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-52) 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 May 4, 2012 (received May 14, 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 (1R425-52) 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

RECEIVED

May 4, 2012

MAY 14 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 M-33 vent (1R425-52): UL/M, 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 2008, ROC initiated work on the former M-33 vent junction box as part of the system abandonment. The site is located in UL/M, Sec. 33, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 55 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x3x14-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 14-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 208 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. Clean, imported soil was used as a top cap and to contour the site to the surrounding area. On 3/20/2008, 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	vent M-33	M	33	17S	35E	Lea	no box; system abandonment		

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

Depth to Groundwater 55 feet NMOCD SITE ASSESSMENT RANKING SCORE: 40*

Date Started 3/4/2008 Date Completed 3/20/2008 OCD Witness no

Soil Excavated 8 cubic yards Excavation Length 5 Width 3 Depth 14 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 3/4/2008 Sample Depth 14 ft

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

CHLORIDE FIELD TESTS

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SOURCE 14' GRAB	0.7	<10.0	<10.0	208

LOCATION	DEPTH	mg/kg
background	6"	77
vertical delineation trench at junction (source)	10'	168
	11'	183
	12'	400
	13'	288
	14'	277

General Description of Remedial Action: This junction was addressed under the Vacuum SWD System abandonment. After this junction was removed, an investigation was conducted using a backhoe to collect soil samples at regular intervals producing a 5x3x14-ft-deep hole. Chloride field tests were performed on each sample, which yielded low concentrations. Organic vapors were measured using a PID, which also yielded low concentrations. The deepest sample, 14 ft BGS, was sent to a commercial laboratory for analysis of chloride and TPH, which confirmed low concentrations. The excavated soil was returned to the excavation and clean, imported soil was used to fill the excavation to ground surface and to contour to the surrounding area. On 3/20/2008, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

*Small pond 580 ft northwest of site.

enclosures: photos, lab results, PID screening, chloride curve

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

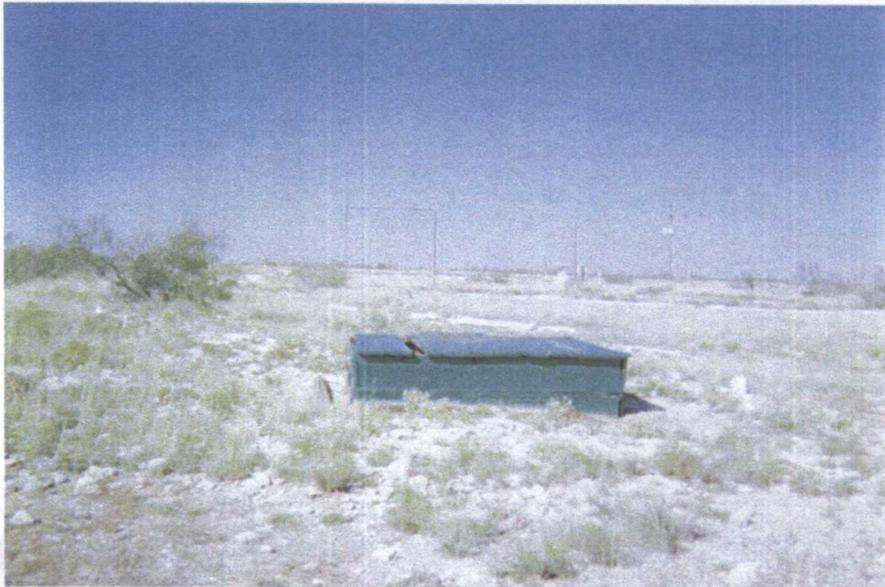
SITE SUPERVISOR Roy Rascon SIGNATURE not available COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Katie Jones INITIAL KJ

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE Larry Bruce Baker Jr. DATE 9-22-08

Vacuum vent M-33

Unit M, Section 33, T17S, R35E



undisturbed junction box, facing north

10/25/2005



delineation trench at former junction site, facing south

3/4/2008



delineation trench at former junction site, facing east

3/4/2008



seeding backfilled site, facing north

3/20/2008



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
 RICE OPERATING CO.
 ATTN: ROY R. RASCON
 122 W. TAYLOR
 HOBBS, NM 88240
 FAX TO: (575) 397-1471

COPY

Receiving Date: 03/05/08
 Reporting Date: 03/06/08
 Project Owner: NOT GIVEN
 Project Name: VAC. VENT M-33 BOOT
 Project Location: NOT GIVEN

Sampling Date: 03/04/08
 Sample Type: SOIL
 Sample Condition: COOL & INTACT
 Sample Received By: BC
 Analyzed By: CK/HM

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/kg)	DRO (>C ₁₀ -C ₂₈) (mg/kg)	CI* (mg/kg)
ANALYSIS DATE		03/05/08	03/05/08	03/05/08
H14377-1	SOURCE @ 14' BGS GRAB INITIAL	<10.0	<10.0	208
Quality Control		558	560	490
True Value QC		500	500	500
% Recovery		112	112	98.0
Relative Percent Difference		2.8	17.1	<0.1

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI: Std. Methods 4500-CI/B
 *Analysis performed on a 1:4 w:v aqueous extract.

Ally D. Keene
 Chemist

03/07/08
 Date

RECEIVED

MAR 11 2008

RICE OPERATING
 HOBBS, NM

H14377TCL RICE

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

RICE OPERATING COMPANY

122 West Taylor Hobbs, NM 88240
 PHONE: (505) 393-9174 FAX: (505) 397-1471
 PID METER CALIBRATION & FIELD REPORT FORM

COPY

CK.		MODEL: PGM 7600	SERIAL NO: 110-013676
MODEL	X	MODEL: PGM 7600	SERIAL NO: 110-013744
NO.		MODEL: PGM 7600	SERIAL NO: 110-012383
		MODEL: PGM 7600	SERIAL NO: 110-012920

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO : 07-3353	EXPIRATION DATE: 5-16-09
FILL DATE: 11-16-07	METER READING ACCURACY: 100.0

ACCURACY : +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
VAC	VENT M-33 BOOT	M	33	17S	35E

SAMPLE ID	PID	SAMPLE ID	PID
VERT @ SOURCE @1'			
2'			
3'			
4'			
5'			
6'			
7'			
8'			
9'			
10'	3.6		
11'	0.4		
12'	0		
13'	0.6		
14'	0.7		

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

SIGNATURE: *Ray L. Easton*

DATE: 3-4-08