

1R - 425-43

**APPROVALS**

**YEAR(S):**

2012

**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Thursday, May 17, 2012 8:19 AM  
**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 (1R425-43) Termination - ROC Vacuum Jct J-26-1 Site

**RE: Termination Request  
for the Rice Operating Company's  
Vacuum Jct J-26-1 Site  
Unit Letter J, Section 26, T17S, R35E, NMPM, Lea County, New Mexico  
Remediation Plan (1R425-43) 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 11, 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 (1R425-43) 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

RECEIVED OCD  
2012 MAY 14 A 11: 13

## **RICE** *Operating Company*

122 West Taylor • Hobbs, New Mexico 88240

Phone: (575) 393-9174 • Fax: (575) 397-1471

May 11, 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

RE: Termination Request  
Vacuum Jct. J-26-1 (1R425-43): UL/J, Sec. 26, 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 2007, ROC initiated work on the former J-26-1 junction box as part of the system abandonment. The site is located in UL/J, Sec. 26, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 50 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 9x3x6-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 <16 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 8/23/2007, 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	NEW BOX DIMENSIONS - FEET		
Vacuum	Jct. J-26-1	J	26	17S	35E	Lea	Length	Width	Depth
							no box; System abandonment		

LAND TYPE: BLM \_\_\_\_\_ STATE \_\_\_\_\_ FEE LANDOWNER \_\_\_\_\_ OTHER \_\_\_\_\_

Depth to Groundwater 50 feet NMOCD SITE ASSESSMENT RANKING SCORE 20

Date Started 8/6/2007 Date Completed 8/22/2007 NMOCD Witness no

Soil Excavated 6 cubic yards Excavation Length 9 Width 3 Depth 6 feet

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

**FINAL ANALYTICAL RESULTS:** Sample Date 8/17/2007 Sample Depth 6 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	GRO mg/kg	DRO mg/kg	Chloride mg/kg
GRAB BELOW FORMER JCT.	0.7	<10.0	<10.0	<16

LOCATION	DEPTH (m)	ppm
background	0.5	118
2	2	115
3	3	126
4	4	180
5	5	177
6	6	155

**General Description of Remedial Action:**

This junction box was addressed as part

of the Vacuum SWD System abandonment. After the box lumber was removed and the pipelines were capped, a delineation trench was made at the site to collect soil samples. Chloride field tests were conducted on the samples and yielded very low concentrations similar to those of the background sample. Organic vapors were measured and also yielded very low concentrations. The grab samples from the deepest part of the trench (6 ft) was sent to a laboratory for confirmation and TPH analysis. TPH and chloride concentrations were not detected in the sample. The excavated soil was returned to the trench and the remainder of the hole (from removal of the junction box) was backfilled with clean, imported soil which was also spread on the surface to encourage regrowth. The surface was seeded with a blend of native vegetation on 8/23/2007 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 Roy Rascon

SIGNATURE Roy R. Rascon COMPANY RICE Operating Company

REPORT ASSEMBLED BY Kristin Farris Pope

SIGNATURE Kristin Farris Pope

DATE 11/30/2007

TITLE Project Scientist

## Vacuum jct. J-26-1

Unit J, Section 26, T17S, R35E



former junction box site; box removed

9/13/2005



6-ft-deep delineation trench at former box site

8/17/2007



spreading clean, imported soil on surface

8/22/2007



seeding backfilled surface

8/23/2007





# ARDINAL LABORATORIES

PHONE (325) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 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: (505) 397-1471

RECEIVED

AUG 23 2007

RICE OPERATING

Receiving Date: 08/17/07  
Reporting Date: 08/20/07  
Project Number: NOT GIVEN  
Project Name: VAC JCT J-26-1  
Project Location: NOT GIVEN

Sampling Date: 08/17/07  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: HM  
Analyzed By: BC/KS

COPY

LAB NUMBER	SAMPLE ID	GRO (C <sub>6</sub> -C <sub>10</sub> ) (mg/Kg)	DRO (C <sub>10</sub> -C <sub>28</sub> ) (mg/Kg)	CI* (mg/Kg)
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ANALYSIS DATE	08/17/07	08/17/07	08/20/07
H13127-1 VERT. SOURCE @ 6" BGS	<10.0	<10.0	<16
Quality Control	776	779	490
True Value QC	800	800	500
% Recovery	97.0	97.3	100
Relative Percent Difference	4.5	4.0	2.0

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.

*Brynn J. Cole*  
Chemist

8/20/07  
Date:

H13127A 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 analysis. 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.



## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page        of       [illegible]

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476.



# RICE OPERATING COMPANY

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

CK.	
MODEL	
NO.	X

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

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 06-3079	EXPIRATION DATE: 3-6-08
FILL DATE: 3-6-07	METER READING ACCURACY: 100.0

ACCURACY: +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
VAC	J-26-1	J	26	17S	35E

SAMPLE ID	PID	SAMPLE ID	PID
VERT @ SOURCE @ 1'			
2'	17.2		
3'	0.9		
4'	0.5		
5'	0.7		
6'	0.7		
7'			
8'			
9'			
10'			
11'			
12'			

COPY

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

SIGNATURE:

*Ray R. Larson*

DATE: 8-17-07