1R - 425-40

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, May 17, 2012 12:32 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 (1R425-40) Termination - ROC Vacuum Phillips B-1578 EOL Site

RE: Termination Request
for the Rice Operating Company's
Vacuum Phillips B-1578 EOL Site
Unit Letter C, Section 30, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-40) 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) and the photo documentation of May 17, 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 (1R425-40) 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

May 4, 2012

RECEIVED

MAY 14 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 Phillips B-1578 EOL (1R425-40): UL/C, Sec. 30, 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 Phillips B-1578 EOL junction box as part of the system abandonment. The site is located in UL/C, Sec. 30, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 130 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 35x35x12-ft deep excavation. Representative samples were collected from the final excavation and sent to a commercial for analysis of chloride and TPH, resulting in a 4-WALL chloride concentration of 423 mg/kg, a gasoline range organics (GRO) concentration below detectable limits, and a diesel range organics (DRO) concentration of 67.3 mg/kg. The bottom composite resulted in a chloride concentration of 457 mg/kg, and concentrations of GRO and DRO below detectable limits. Chloride concentrations decreased with depth as the site was excavated to 12 ft bgs. The backfill resulted in a chloride concentration of 716 mg/kg, and concentrations of GRO and DRO below detectable limits. The excavated soil was blended on site and 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 4/25/2006, 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	NEW BOX DIMENSIONS - FEET		
							Length	Width	Depth
Vacuum	B-1578 EOL	C	30	17S	35E	Lea	no box--System abandonment		

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

Depth to Groundwater 130 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 9/1/2005 Date Completed 4/21/2006 NMOCD Witness no

Soil Excavated 544 cubic yards Excavation Length 35 Width 35 Depth 12 feet

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

FINAL ANALYTICAL RESULTS: **Sample Date** 3/9/2006 **Sample Depth** 12 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.	0.8	<10.0	67.3	423
BOTTOM COMP.	0.6	<10.0	<10.0	457
BACKFILL	5.8	<10.0	<10.0	716

CHLORIDE FIELD TESTS

LOCATION	DEPTH (ft)	ppm
SOURCE below former junction	6	1363
	7	1229
	8	1182
	9	1349
	10	1143
	11	937
	12	794
4-wall comp.	n/a	608
bottom comp.	12	669
backfill comp.	n/a	899

General Description of Remedial Action:

This junction box site was addressed as part of the Vacuum SWD System abandonment. After the box was removed, a backhoe was used to collect soil samples at regular intervals producing a 35 x 35 x 12-ft-deep excavation. Chloride field tests were conducted on each sample; concentrations declined with depth and breadth. Organic vapors were also measured using a PID and these concentrations were low. Composite samples were collected from the final excavation for laboratory confirmation of field results. TPH concentrations met NMOCD guidelines. The excavated soil was blended on site and returned to the excavation. Clean soil was imported to complete the backfill and contour to the surrouding surface. The disturbed area was seeded with a blend of native vegetation and is expected to return to productive capacity at a normal rate.

enclosures: photos, lab results, chloride graph

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 8/28/2007 TITLE Project Scientist

Vacuum B-1578 EOL

unit C, sec. 30, T17S, R35E

undisturbed junction box 7/11/2005

beginning delineation with trackhoe 9/1/2005

final 35 x 35 x 12-ft-deep excavation 3/9/2006

seeding surface of backfilled site 4/25/2006

ENVIRONMENTAL LAB OF

12600 West I-20 East - Odessa, Texas 79765

35' x 35' 12'
FINAL

Analytical Report

Prepared for:

Roy Rascon
Rice Operating Co.
122 W. Taylor
Hobbs, NM 88240

Project: Vac. Phillips B 1578 EOL
Project Number: None Given
Location: None Given

Lab Order Number: 6C13003

Report Date: 03/15/06

Rice Operating Co.	Project: Vac. Phillips B 1578 EOL	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	03/15/06 10:33

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
4 Wall Comp.	6C13003-01	Soil	03/09/06 11:38	03/10/06 16:30
Remediated Backfill	6C13003-02	Soil	03/09/06 15:00	03/10/06 16:30
Bottom Comp. @ 12' bgs	6C13003-03	Soil	03/09/06 11:15	03/10/06 16:30

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

Rice Operating Co.	Project: Vac. Phillips B 1578 EOL	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	03/15/06 10:33

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
4 Wall Comp. (6C13003-01) Soil									
Carbon Ranges C6-C12	ND	10.0	mg/kg dry	1	EC61319	03/13/06	03/14/06	EPA 8015M	
Carbon Ranges C12-C28	**67.3**	10.0	"	"	"	"	"	"	
Carbon Ranges C28-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	**67.3**	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*121 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*120 %*	*70-130*		"	"	"	"	
Remediated Backfill (6C13003-02) Soil									
Carbon Ranges C6-C12	ND	10.0	mg/kg dry	1	EC61319	03/13/06	03/14/06	EPA 8015M	
Carbon Ranges C12-C28	ND	10.0	"	"	"	"	"	"	
Carbon Ranges C28-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*117 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*120 %*	*70-130*		"	"	"	"	
Bottom Comp. @ 12' bgs (6C13003-03) Soil									
Carbon Ranges C6-C12	ND	10.0	mg/kg dry	1	EC61319	03/13/06	03/14/06	EPA 8015M	
Carbon Ranges C12-C28	ND	10.0	"	"	"	"	"	"	
Carbon Ranges C28-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*93.8 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*92.4 %*	*70-130*		"	"	"	"	

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Rice Operating Co.	Project: Vac. Phillips B 1578 EOL	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	03/15/06 10:33

General Chemistry Parameters by EPA / Standard Methods
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
4 Wall Comp. (6C13003-01) Soil									
Chloride	**423**	10.0	mg/kg	20	EC61502	03/14/06	03/15/06	EPA 300.0	
% Moisture	**2.3**	0.1	%	1	EC61405	03/13/06	03/14/06	% calculation	
Remediated Backfill (6C13003-02) Soil									
Chloride	**716**	10.0	mg/kg	20	EC61502	03/14/06	03/15/06	EPA 300.0	
% Moisture	**1.4**	0.1	%	1	EC61405	03/13/06	03/14/06	% calculation	
Bottom Comp. @ 12' bgs (6C13003-03) Soil									
Chloride	**457**	10.0	mg/kg	20	EC61502	03/14/06	03/15/06	EPA 300.0	
% Moisture	**2.4**	0.1	%	1	EC61405	03/13/06	03/14/06	% calculation	

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Rice Operating Co.	Project: Vac. Phillips B 1578 EOL	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	03/15/06 10:33

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 EC61319 - Solvent Extraction (GC)										
Blank (EC61319-BLK1)				Prepared: 03/13/06 Analyzed: 03/14/06						
Carbon Ranges C6-C12	ND	10.0	mg/kg wet							
Carbon Ranges C12-C28	ND	10.0	"							
Carbon Ranges C28-C35	ND	10.0	"							
Total Hydrocarbon C6-C35	ND	10.0	"							
Surrogate: 1-Chlorooctane	*48.1*		*mg/kg*	*50.0*		*96.2*	*70-130*			
Surrogate: 1-Chlorooctadecane	*41.5*		"	*50.0*		*83.0*	*70-130*			
LCS (EC61319-BS1)				Prepared: 03/13/06 Analyzed: 03/14/06						
Carbon Ranges C6-C12	483	10.0	mg/kg wet	500		96.6	75-125			
Carbon Ranges C12-C28	537	10.0	"	500		107	75-125			
Total Hydrocarbon C6-C35	1020	10.0	"	1000		102	75-125			
Surrogate: 1-Chlorooctane	*92.6*		*mg/kg*	*100*		*92.6*	*70-130*			
Surrogate: 1-Chlorooctadecane	*72.7*		"	*100*		*72.7*	*70-130*			
Calibration Check (EC61319-CCV1)				Prepared: 03/13/06 Analyzed: 03/14/06						
Carbon Ranges C6-C12	257		mg/kg	250		103	80-120			
Carbon Ranges C12-C28	262		"	250		105	80-120			
Total Hydrocarbon C6-C35	519		"	500		104	80-120			
Surrogate: 1-Chlorooctane	*110*		"	*100*		*110*	*70-130*			
Surrogate: 1-Chlorooctadecane	*99.6*		"	*100*		*99.6*	*70-130*			
Matrix Spike (EC61319-MS1)	**Source: 6C13003-01**			Prepared: 03/13/06 Analyzed: 03/14/06						
Carbon Ranges C6-C12	412	10.0	mg/kg dry	512	ND	80.5	75-125			
Carbon Ranges C12-C28	487	10.0	"	512	67.3	82.0	75-125			
Total Hydrocarbon C6-C35	899	10.0	"	1020	67.3	81.5	75-125			
Surrogate: 1-Chlorooctane	*57.2*		*mg/kg*	*50.0*		*114*	*70-130*			
Surrogate: 1-Chlorooctadecane	*40.8*		"	*50.0*		*81.6*	*70-130*			

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Rice Operating Co.	Project: Vac. Phillips B 1578 EOL	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	03/15/06 10:33

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 EC61319 - Solvent Extraction (GC)										
Matrix Spike Dup (EC61319-MSD1)	**Source: 6C13003-01**			Prepared: 03/13/06 Analyzed: 03/14/06						
Carbon Ranges C6-C12	428	10.0	mg/kg dry	512	ND	83.6	75-125	3.81	20	
Carbon Ranges C12-C28	493	10.0	"	512	67.3	83.1	75-125	1.22	20	
Total Hydrocarbon C6-C35	921	10.0	"	1020	67.3	83.7	75-125	2.42	20	
Surrogate: 1-Chlorooctane	*59.0*		*mg/kg*	*50.0*		*118*	*70-130*			
Surrogate: 1-Chlorooctadecane	*42.1*		*"*	*50.0*		*84.2*	*70-130*			

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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 EC61405 - General Preparation (Prep)										
Blank (EC61405-BLK1)				Prepared: 03/13/06 Analyzed: 03/14/06						
% Solids	100		%							
Duplicate (EC61405-DUP1)		Source: 6C10011-01		Prepared: 03/13/06 Analyzed: 03/14/06						
% Solids	96.5		%		96.9			0.414	20	
Duplicate (EC61405-DUP2)		Source: 6C10017-03		Prepared: 03/13/06 Analyzed: 03/14/06						
% Solids	89.8		%		90.4			0.666	20	
Duplicate (EC61405-DUP3)		Source: 6C13014-01		Prepared: 03/13/06 Analyzed: 03/14/06						
% Solids	92.8		%		92.5			0.324	20	
Batch EC61502 - Water Extraction										
Blank (EC61502-BLK1)				Prepared: 03/14/06 Analyzed: 03/15/06						
Chloride	ND	0.500	mg/kg							
LCS (EC61502-BS1)				Prepared: 03/14/06 Analyzed: 03/15/06						
Chloride	9.23		mg/L	10.0		92.3	80-120			
Calibration Check (EC61502-CCV1)				Prepared: 03/14/06 Analyzed: 03/15/06						
Chloride	8.97		mg/L	10.0		89.7	80-120			
Duplicate (EC61502-DUP1)		Source: 6C13003-01		Prepared: 03/14/06 Analyzed: 03/15/06						
Chloride	420	10.0	mg/kg		423			0.712	20	

Rice Operating Co.	Project: Vac. Phillips B 1578 EOL	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	03/15/06 10:33

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: 3-15-06

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 R Rascon
Company Name: Rec Operating
Company Address: 122 W Taylor
City/State/Zip: Hobbs NM 88240
Telephone No: (505) 393-6174 Fax No:
Sampler Signature:

Project Name: Vac Phillips B-1578
Project #:
Project Loc:
PO #:

Lab # (lab use only) 60130-03

FIELD CODE	Date Sampled	Time Sampled	No. of Containers	Preservative: Ice	HNO3	HCl	NaOH	H2SO4	None	Other (Specify)	Matrix: Water	Sludge	Soil	Other (specify)	Analyze For: TCLP: TDS / Cl / SAR / EC	TPH 418.1	TPH TX 1005/1006	TPH 8015M GRO/DRO	TOTAL: Metals: As Ag Ba Cd Cr Pb Hg Se	Volatiles	Semivolatiles	BTEX 8021B/5030	RUSH TAT (Pre-Schedule)
4 wall Comp	3/9/06	11:38am	1	X									X		X			X					
Remediated backfill	3/9/06	3:00pm	1	X									X		X			X					
Bottom Comp @ 12' bgs	3/9/06	11:15am	1	X									X		X			X					

Special Instructions:

Relinquished by:	Date	Time	Received by:	Date	Time
	3-10-06	9:15 AM		3/10	15:05
	3/10	16:30		3/10/06	16:30

Sample Constituent (Y/N) Y N
Temperature Upon Receipt: 5.0 C
Laboratory Comments: Hold

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

Client: Rice Operating Co.

Date/Time: 03-10-06 @ 16:30

Order #: 6C130003

Initials: JMM

Sample Receipt Checklist

Temperature of container/cooler?	(Yes)	No	5.0 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
CALIBRATION GAS
GAS COMPOSITION: ISOBUTYLENE 100 PPM
AIR BALANCE
LOT NO: 04-2747
FILL DATE: 2-1-05
EXP. DATE: 8-1-06
ACCURACY: +/- 2%
METER READING
ACCURACY: 100.6

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
VAC	Phillips B-1578 EOL	C	30	17S	35E

	SAMPLE	PID RESULT	SAMPLE	PID RESULT
	Bttm. Comp. @ 12'	0.0		
20x20x12'	4. Wall Comp	0.1		
	Remed. Soil	0.0		
10'	N. WALL Comp.	0.1		
10'	S. WALL Comp.	0.1		
10'	E. WALL Comp.	0.1		
10'	W. Wall Comp.	0.1		

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

Roy A. Rascon
Signature

9-6-05
Date

Hansen, Edward J., EMNRD

From: Laura Pena <lpena@riceswd.com>
Sent: Thursday, May 17, 2012 12:01 PM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder; Katie Jones
Subject: Vacuum B-1578 EOL (1R425-40) Photo Documentation
Attachments: Vacuum B-1578 EOL (1R425-40) Photo Documentation.pdf

Mr. Hansen,

Attached is the photo documentation for the Vacuum B-1578 EOL (1R425-40) site as requested.

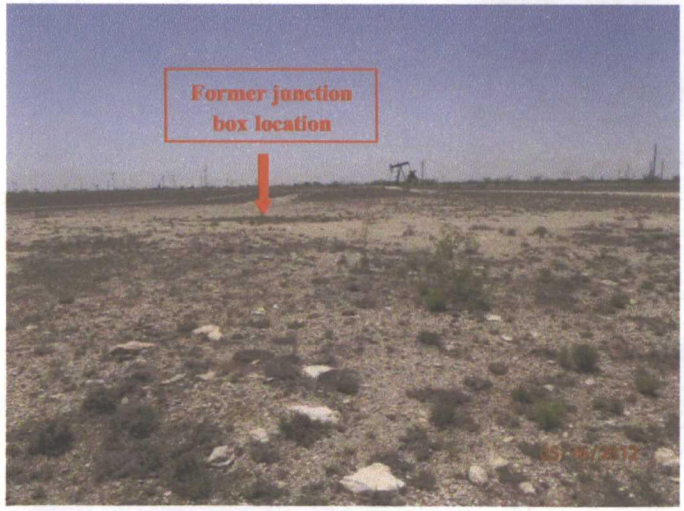
If you have any questions, please contact Hack Conder at (575)631-6432.

Thank you,
Laura Peña

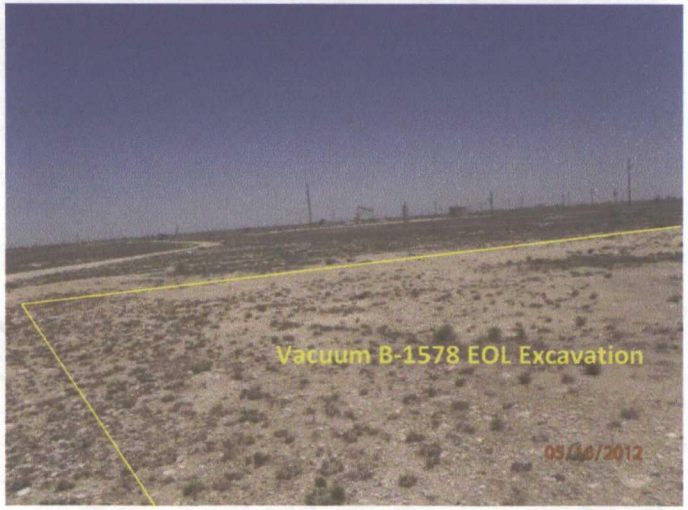
Vacuum B-1578 EOL (1R425-40)
Unit C, Section 30, T17S, R35E

Facing east 7/11/2005

Facing west 7/11/2005



Facing east 5/16/2012



Facing west 5/16/2012