1R - 425-39

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, May 17, 2012 10:09 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 (1R425-39) Termination - ROC Vacuum Texaco 'AN' EOL Site

RE: Termination Request
for the Rice Operating Company's
Vacuum Texaco 'AN' EOL Site
Unit Letter B, Section 7, T18S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-39) 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 additional field analytical data received May 15, 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 (1R425-39) 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

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 Texaco 'AN' EOL (1R425-39): UL/B, Sec. 7, T18S, 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 Texaco 'AN' EOL junction box as part of the system abandonment. The site is located in UL/B, Sec. 7, T18S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 80 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 9x3x7-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 7-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 624 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (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 7/25/2007, 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

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	AN EOL	B	7	18S	35E	Lea	no box--System abandonment		

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

Depth to Groundwater 80 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 7/19/2007 Date Completed 7/24/2007 NMOCD Witness no

Soil Excavated 7 cubic yards Excavation Length 9 Width 3 Depth 7 feet

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

FINAL ANALYTICAL RESULTS: **Sample Date** 7/19/2007 **Sample Depth** 7 ft

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
grab 7 ft below junction	0.0	<10.0	<10.0	624

CHLORIDE FIELD TESTS

LOCATION	DEPTH (ft)	ppm
7 ft below junction	7	531

General Description of Remedial Action:

This end-of-line (EOL) junction box was eliminated with the Vacuum SWD System abandonment. After the box was removed, the location was inspected for chloride and hydrocarbon impact. The soils at and surrounding the site were a sandy type with hard caliche outcropping near the surface and did not exhibit signs of adverse impact from the junction box. The surrounding surface has a healthy vegetative cover and does not appear to be stressed. A delineation trench was made at the former junction site using a backhoe to collect soil samples every foot of depth to 7 ft BGS. Chloride field tests were conducted on each of the samples and yielded relatively low concentrations. Organic vapors were also measured in the field using a PID and those concentrations were also very low. The deepest sample (7 ft) was analyzed at a laboratory for confirmation of the field tests. TPH concentrations met NMOCD guidelines. The excavated soil was blended on site and returned to the trench. 12 cubic yards of clean fill was imported to complete the backfill and contour the site to the surrounding terrain. The disturbed surface was seeded with a blend of native vegetation on 7/25/2007 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 Pope

DATE 8/28/2007 TITLE Project Scientist

Vacuum 'AN' EOL

unit B, section 7, T18S, R35E

former junction box site marked by flagged stake behind concrete tank base

7-ft-deep delineation trench 7/19/2007

backfilling trench 7/19/2007

seeding site with clean, imported soil at the surface 7/25/2007

CARDINAL LABORATORIES

PHONE (915) 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) 393-1471

Receiving Date: 07/19/07
Reporting Date: 07/24/07
Project Number: NOT GIVEN
Project Name: VAC TEXACO "AN" EOL
Project Location: NOT GIVEN

Sampling Date: 07/19/07
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC/HM

LAB NUMBER SAMPLE ID	GRO (C_6-C_{10}) (mg/Kg)	DRO (>C_{10}-C_{28}) (mg/Kg)	Cl* (mg/Kg)
ANALYSIS DATE	07/20/07	07/20/07	07/20/07
H12938-1 SOURCE @ 7' BGS GRAB	<10.0	<10.0	624
Quality Control	748	735	490
True Value QC	800	800	500
% Recovery	94.7	93.9	98.0
Relative Percent Difference	6.1	6.4	2.1

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

Chemist

7/24/07
Date

H12938 RICE

CARDINAL LABORATORIES, INC.

2111 Beechwood, Abilene, TX 79603 101 East Marland, Hobbs, NM 88240
(915) 673-7001 Fax (915) 673-7020 (505) 393-2326 Fax (505) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page ____ of ____

Company Name: RICE OPER. CO.	**BILL TO**
Project Manager: Roy R. RASCON	P.O. #:
Address: 122 W. TAYLOR	Company:
City: Hobbs State: NM Zip: 88240	Attn:
Phone #: 505 393-9174 Fax #: 505 397-1471	Address:
Project #: Project Owner:	City:
Project Name: VAC TEXAS "AN" EOL	State: Zip:
Project Location:	Phone #:
Sampler Name: Roy R. RASCON	Fax #:

FOR LAB USE ONLY Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP	# CONTAINERS	MATRIX: GROUNDWATER	WASTEWATER	SOIL	CRUDE OIL	SLUDGE	OTHER	PRESERV: ACID/BASE	ICE / COOL	OTHER	SAMPLING: DATE	TIME	ANALYSIS REQUEST: TPH 8015 M	Cl-
H12938-1	SOURCE @ 7' BGS GRAB	G	1			✓					✓		7-19-07	1500	✓	✓

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 the client for the 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 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.

Terms and Conditions: Interest will be charged on all accounts more than 30 days past due at the rate of 24% per annum from the original date of invoice and all costs of collections, including attorney's fees.

Sampler Relinquished: Roy R. RASCON	Date: 7-19-07 Time: 1642	Received By:	Phone Result: ☐ Yes ☐ No Add'l Phone #:
Relinquished By:	Date: 7/19/07 Time: 4:42PM	Received By: (Lab Staff)	Fax Result: ☑ Yes ☐ No Add'l Fax #:
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	Sample Condition Cool: ☒ Yes ☐ No Intact: ☒ Yes ☐ No	CHECKED BY: (Initials)	REMARKS: Email to JPURVIS & RRASCON@RICESWD.COM

† 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.	X	MODEL: PGM 7600	SERIAL NO: 110-013676
MODEL		MODEL: PGM 7600	SERIAL NO: 110-013744
NO.		MODEL: PGM 7600	SERIAL NO: 110-12383
		MODEL: PGM 7600	SERIAL NO: 110-012920

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO : 06-3079	EXPIRATION DATE: 12-16-07
FILL DATE: 6-16-06	METER READING ACCURACY: 100.0

ACCURACY : +/- 2% .

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
VAC	TEXACO "AN" EOL	B	7	18S	35E

SAMPLE ID	PID	SAMPLE ID	PID
Vert. @ source 1'bgs	0		
2'	0		
3'	0		
4'	0.8		
5'	0		
6'	0		
this sample sent to lab 7'	0		

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

SIGNATURE: Kay R. Larson

DATE: 7-19-07

Hansen, Edward J., EMNRD

From: Laura Pena <lpena@riceswd.com>
Sent: Tuesday, May 15, 2012 2:20 PM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder; Katie Jones
Subject: Vacuum Texaco 'AN' EOL (1R425-39) Data
Attachments: Vacuum Texaco 'AN' EOL (1R425-39) Vertical Data.pdf

Mr. Hansen,

Attached is the vertical data for the Vacuum Texaco 'AN' EOL (1R425-39) site as requested.

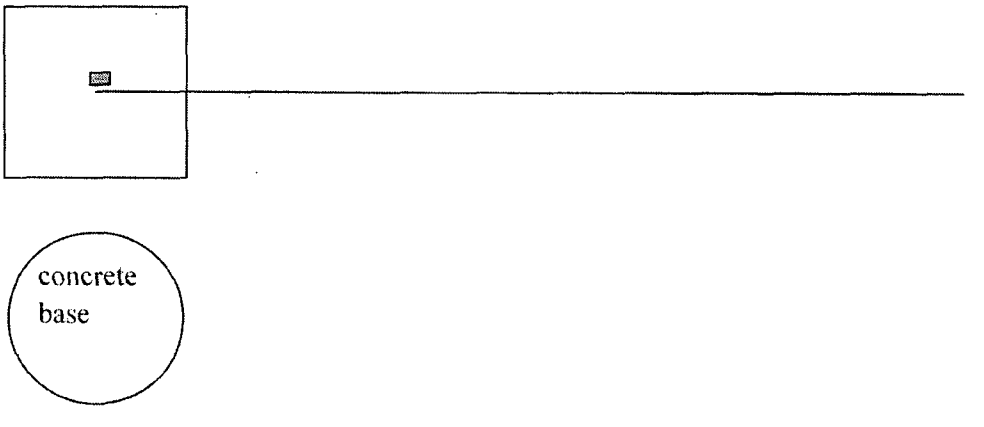
If you have any questions or require more information, please do not hesitate to contact Hack Conder at (575) 631-6432.

Thank you,
Laura Peña

JCT DELINEATION REPORT

LOCATION: VAC TEXACO "AN" EOL							
DEPTH TO GW: 80'						LAND OWNER: STATE	
VERT. @ SOURCE							
DEPTH	SOIL	WATER	CF	AGNO3	CL-	PID	SOIL LITHOLOGY
1'	12.5	32.3	2.58	0.03	77	0	brown dirt dry
2'	11.6	31.3	2.70	0.04	108	0	brown dirt damp
3'	11.4	30.8	2.70	0.21	567	0	caliche fine dry
4'	10.2	32.8	3.22	0.19	611	0.8	caliche fine dry
5'	10.8	33.3	3.08	0.2	616	0	caliche fine dry
6'	11.1	32.9	2.96	0.2	593	0	caliche fine dry
7'	11.3	30	2.65	0.2	531	0	caliche fine dry this sample to lab
8'			#DIV/0!		#DIV/0!		
9'			#DIV/0!		#DIV/0!		
10'			#DIV/0!		#DIV/0!		
11'			#DIV/0!		#DIV/0!		
12'			#DIV/0!		#DIV/0!		

NORTH



sample pt.

SIGNATURE: Ray K. Peterson

DATE: 7-19-07