

1R - 425-44

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, May 21, 2012 1:46 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 (1R425-44) Termination - ROC Vacuum Jct E-25 Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum Jct E-25 Site
Unit Letter E, Section 25, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-44) 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) and the photo documentation of May 21, 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 (1R425-44) 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 11, 2012

RECEIVED

Mr. Edward Hansen
New Mexico Energy, Minerals, & Natural Resources
Oil Conservation Division, Environmental Bureau
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

MAY 14 2012

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

RE: Termination Request
Vacuum Jct. E-25 (1R425-44): UL/E, Sec. 25, 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 E-25 junction box as part of the system abandonment. The site is located in UL/E, Sec. 25, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 60 +/- feet. The site was delineated using a trackhoe to collect soil samples at regular intervals, creating a 20x15x12-ft deep excavation. The excavated soil was blended on site and representative composite samples of the excavation bottom, the excavation walls, and the backfill were sent to a commercial for analysis of chloride and TPH, resulting in a 4-WALL chloride concentration of 429 mg/kg, and concentrations of GRO and DRO below detectable limits. The bottom composite resulted in a chloride concentration of 368 mg/kg, and concentrations of GRO and DRO below detectable limits. The backfill resulted in a chloride concentration of 427 mg/kg, and concentrations of GRO and DRO below detectable limits. The backfill was returned to the excavation and contoured to the surrounding area. On 9/21/2006, 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, and laboratory analysis 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. E-25	E	25	17S	35E	Lea	Length	Width	Depth
no box; SWD System Abandonment.									

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

Depth to Groundwater: 60 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started: 6/30/2005 Date Completed: 4/25/2006 NMOCD Witness: no

Soil Excavated: 133 cubic yards Excavation Length: 20 Width: 15 Depth: 12 feet

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

FINAL ANALYTICAL RESULTS: Sample Date: 12/14/2005 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.

CHLORIDE FIELD TESTS:

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
4-WALL COMP.		<10.0	<10.0	429
BOTTOM COMP.		<10.0	<10.0	368
BACKFILL		<10.0	<10.0	427

LOCATION	DEPTH (in)	ppm
below former junction site	6	1881
	7	997
	8	532
	9	303
	10	262
	11	274
5 ft NORTH of former junction site	12	184
	5	2969
	6	2078
	7	671
	8	917
	9	992
4-wall comp.	10	418
	11	539
	12	209
	n/a	425
bottom comp.	12	304
backfill comp.	n/a	427

General Description of Remedial Action:

This junction box site was addressed as part of the abandonment of the Vacuum SWD System. After the box lumber was removed, a trackhoe was used to collect soil samples at regular intervals to produce a 20 x 15 x 12-ft excavation. Chloride field tests were conducted on each sample and concentrations exhibited a trend of decline with depth. Soil samples were also screened for organic vapors using a PID and yielded very low concentrations. Composite samples from the excavation, floor and walls were collected for laboratory analysis which did not detect hydrocarbon concentrations, meeting NMOCD guidelines. The excavated soil was blended on site and returned to the hole and contoured to the surrounding surface. On 9/22/2006, the disturbed surface 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: 12/18/2007 TITLE: Project Scientist

Vacuum jct. E-25



undisturbed junction box

6/30/2005



box removed; delineation and excavation

8/4/2005



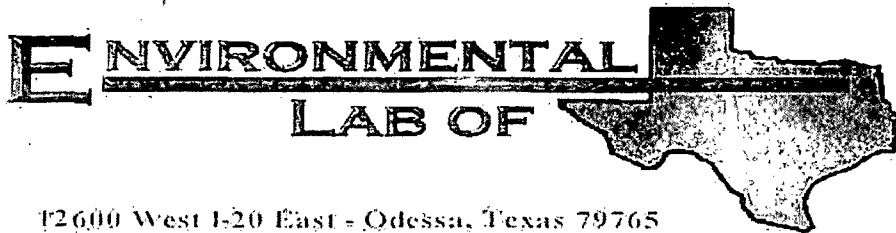
backfilling 20 x 15 x 12-ft excavation

4/25/2006

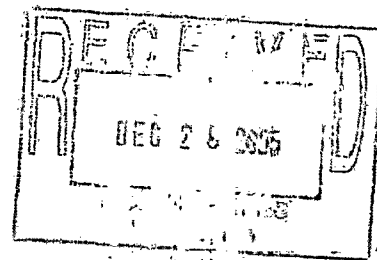


seeding disturbed area of backfilled site

9/21/2006



12600 West I-20 East - Odessa, Texas 79765



FINAL

20 X 15 X 12

Analytical Report

Prepared for:

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

Project: Vacuum E-25
Project Number: None Given
Location: None Given
Lab Order Number: 5L15005
Report Date: 12/21/05

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

Project: Vacuum E-25
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
12/21/05 08:48

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Vac. Jct. E-25 Backfill	SL15005-01	Soil	12/14/05 00:00	12/15/05 08:00
Vac. Jct. E-25 Bottom	SL15005-02	Soil	12/14/05 00:00	12/15/05 08:00
Vac. Jct. E-25 4 Wall	SL15005-03	Soil	12/14/05 00:00	12/15/05 08:00

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

Project: Vacuum E-25
Project Number: None Given
Project Manager: Roy Rascón

Fax: (505) 397-1471

Reported:
12/21/05 08:48

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Note
Vac. Jet. E-25 Backfill (SL15005-01) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EL51506	12/15/05	12/16/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		78.0 %	70-130	"	"	"	"	"	
Surrogate: 1-Chlorodecane		70.8 %	70-130	"	"	"	"	"	
Vac. Jet. E-25 Bottom (SL15005-02) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EL51506	12/15/05	12/16/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		86.8 %	70-130	"	"	"	"	"	
Surrogate: 1-Chlorodecane		71.6 %	70-130	"	"	"	"	"	
Vac. Jet. E-25-4 Vail (SL15005-03) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EL51508	12/15/05	12/18/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		85.4 %	70-130	"	"	"	"	"	
Surrogate: 1-Chlorodecane		74.8 %	70-130	"	"	"	"	"	

Environmental Lab of Texas

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

Project: Vacuum E-25
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
12/21/05 08:48

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

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Vac. Jct. E-25 Backfill (5L15005-01) Soil									
Chloride	427	10.0	mg/kg	20	EL52102	12/20/05	12/21/05	EPA 300.0	
% Moisture	6.5	0.1	%	1	EL51609	12/15/05	12/16/05	% calculation	
Vac. Jct. E-25 Bottom (5L15005-02) Soil									
Chloride	368	10.0	mg/kg	20	EL52102	12/20/05	12/21/05	EPA 300.0	
% Moisture	10.0	0.1	%	1	EL51609	12/15/05	12/16/05	% calculation	
Vac. Jct. E-25 4 Wall (5L15005-03) Soil									
Chloride	429	10.0	mg/kg	20	EL52102	12/20/05	12/21/05	EPA 300.0	
% Moisture	7.0	0.1	%	1	EL51609	12/15/05	12/16/05	% calculation	

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Rice Operating Co.
122 W. Taylor
Hobbs NM 88240

Project: Vacuum E-25
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
12/21/05 08:48

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
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Batch EL51506 - Solvent Extraction (GC)

Blank (EL51506-BLK1)

Prepared & Analyzed: 12/15/05

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	56.7		mg/kg	50.0		113	70-130			
Surrogate: 1-Chlorooctadecane	46.3		"	50.0		92.6	70-130			

LCS (EL51506-BS1)

Prepared & Analyzed: 12/15/05

Gasoline Range Organics C6-C12	378	10.0	mg/kg wet	500		75.6	75-125			
Diesel Range Organics >C12-C35	468	10.0	"	500		93.6	75-125			
Total Hydrocarbon C6-C35	846	10.0	"	1000		84.6	75-125			
Surrogate: 1-Chlorooctane	52.5		mg/kg	50.0		105	70-130			
Surrogate: 1-Chlorooctadecane	40.8		"	50.0		81.6	70-130			

Calibration Check (EL51506-CCV1)

Prepared: 12/15/05 Analyzed: 12/16/05

Gasoline Range Organics C6-C12	412		mg/kg	500		82.4	80-120			
Diesel Range Organics >C12-C35	504		"	500		101	80-120			
Total Hydrocarbon C6-C35	916		"	1000		91.6	80-120			
Surrogate: 1-Chlorooctane	52.1		"	50.0		104	70-130			
Surrogate: 1-Chlorooctadecane	42.5		"	50.0		85.0	70-130			

Matrix Spike (EL51506-MS1)

Source: 5L15003-01

Prepared & Analyzed: 12/15/05

Gasoline Range Organics C6-C12	496	10.0	mg/kg dry	528	ND	93.9	75-125			
Diesel Range Organics >C12-C35	441	10.0	"	528	ND	83.5	75-125			
Total Hydrocarbon C6-C35	937	10.0	"	1060	ND	88.4	75-125			
Surrogate: 1-Chlorooctane	50.6		mg/kg	50.0		101	70-130			
Surrogate: 1-Chlorooctadecane	36.1		"	50.0		72.2	70-130			

Matrix Spike Dup (EL51506-MSD1)

Source: 5L15003-01

Prepared & Analyzed: 12/15/05

Gasoline Range Organics C6-C12	502	10.0	mg/kg dry	528	ND	95.1	75-125	120	20	
Diesel Range Organics >C12-C35	441	10.0	"	528	ND	83.5	75-125	0.00	20	
Total Hydrocarbon C6-C35	943	10.0	"	1060	ND	89.0	75-125	10.638	20	
Surrogate: 1-Chlorooctane	51.0		mg/kg	50.0		102	70-130			
Surrogate: 1-Chlorooctadecane	33.9		"	50.0		71.8	70-130			

Environmental Lab of Texas

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

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

Project: Vacuum E-25
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
12/21/05 08:48

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
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Batch EL51508 - Solvent Extraction (GC)

Blank (EL51508-BLK1) Prepared: 12/15/05 Analyzed: 12/18/05

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	56.1		mg/kg	50.0		112	70-130			
Surrogate: 1-Chlorooctadecane	60.0		"	50.0		120	70-130			

LCS (EL51508-BS1) Prepared: 12/15/05 Analyzed: 12/18/05

Gasoline Range Organics C6-C12	450	10.0	mg/kg wet	500		90.0	75-125			
Diesel Range Organics >C12-C35	461	10.0	"	500		92.2	75-125			
Total Hydrocarbon C6-C35	911	10.0	"	1000		91.1	75-125			
Surrogate: 1-Chlorooctane	56.0		mg/kg	50.0		112	70-130			
Surrogate: 1-Chlorooctadecane	57.6		"	50.0		115	70-130			

Calibration Check (EL51508-CCV1) Prepared: 12/15/05 Analyzed: 12/19/05

Gasoline Range Organics C6-C12	435		mg/kg	500		87.0	80-120			
Diesel Range Organics >C12-C35	476		"	500		95.2	80-120			
Total Hydrocarbon C6-C35	911		"	1000		91.1	80-120			
Surrogate: 1-Chlorooctane	57.7		"	50.0		115	70-130			
Surrogate: 1-Chlorooctadecane	62.4		"	50.0		125	70-130			

Matrix Spike (EL51508-MS1) Source: SL15006-01 Prepared: 12/15/05 Analyzed: 12/18/05

Gasoline Range Organics C6-C12	496	10.0	mg/kg dry	529	ND	93.8	75-125			
Diesel Range Organics >C12-C35	410	10.0	"	529	ND	77.5	75-125			
Total Hydrocarbon C6-C35	906	10.0	"	1060	ND	85.5	75-125			
Surrogate: 1-Chlorooctane	53.8		mg/kg	50.0		108	70-130			
Surrogate: 1-Chlorooctadecane	45.3		"	50.0		91.0	70-130			

Matrix Spike Dup (EL51508-MSD1) Source: SL15006-01 Prepared: 12/15/05 Analyzed: 12/18/05

Gasoline Range Organics C6-C12	484	10.0	mg/kg dry	529	ND	91.5	75-125	2.45	20	
Diesel Range Organics >C12-C35	400	10.0	"	529	ND	75.6	75-125	2.47	20	
Total Hydrocarbon C6-C35	884	10.0	"	1060	ND	83.4	75-125	2.46	20	
Surrogate: 1-Chlorooctane	52.2		mg/kg	50.0		104	70-130			
Surrogate: 1-Chlorooctadecane	43.6		"	50.0		87.2	70-130			

Environmental Lab of Texas

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

Project: Vacuum E-25
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
12/21/05 08:48

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 EL51609 - General Preparation (Prep)										
Blank (EL51609-BLK1)					Prepared: 12/15/05 Analyzed: 12/16/05					
% Solids	100		%							
Duplicate (EL51609-DUP1)					Source: 5L14008-01 Prepared: 12/15/05 Analyzed: 12/16/05					
% Solids	94.3		%		95.6			1.37	20	
Duplicate (EL51609-DUP2)					Source: 5L15001-09 Prepared: 12/15/05 Analyzed: 12/16/05					
% Solids	90.7		%		91.0			0.330	20	
Duplicate (EL51609-DUP3)					Source: 5L15014-01 Prepared: 12/15/05 Analyzed: 12/16/05					
% Solids	98.0		%		98.5			0.509	20	
Batch EL52102 - Water Extraction										
Blank (EL52102-BLK1)					Prepared: 12/20/05 Analyzed: 12/21/05					
Chloride	ND	0.500	mg/kg							
LCS (EL52102-BL1)					Prepared: 12/20/05 Analyzed: 12/21/05					
Chloride	8.33		mg/L	10.0	83.3		80-120			
Calibration Check (EL52102-CCV1)					Prepared: 12/20/05 Analyzed: 12/21/05					
Chloride	8.46		mg/L	10.0	84.6		80-120			
Duplicate (EL52102-DUP1)					Source: 5L15002-01 Prepared: 12/20/05 Analyzed: 12/21/05					
Chloride	94.9	5.00	mg/kg		92.0			3.10	20	

Environmental Lab of Texas

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Page 6 of 7

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

Project: Vacuum E-25
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
12/21/05 08:48

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: 12-23-05

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer
Jeanne McMurtry, Inorg. Tech Director
LaTasha Cornish, Chemist
Sandra Sanchez, Lab Tech

This material is intended only for the use of the individual (s) or entity to whom it is addressed, and may contain information that is privileged and confidential.

If you have received this material in error, please notify us immediately at 432-563-1800.

Environmental Lab of Texas

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Page 7 of 7

12600 West 1120 East
Odessa, Texas 79763

Phone: 915-563-1800
Fax: 915-563-1713

Project Manager: Roy Kgs Con

Project Name: VAC. F-25

Company Name: Rice

Project #:

Company Address: 122 W. Taylor

Project Loc: _____

City/State/Zip: Hobbs N.M. 88240

PO #: _____

Telephone No: 393 9174

(Fax) N°: _____

Sampler, Signature:

[illegible]

Environmental Lab of Texas

Variance / Corrective Action Report – Sample Log-In

Client: 1202 Op.

Date/Time: 12/15/05 8:00

Order #: SL15005

Initials: CK

Sample Receipt Checklist

Temperature of container/cooler?	Yes	No	<u>Yes</u>	<u>C</u>
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:

Hansen, Edward J., EMNRD

From: Laura Pena <lpena@riceswd.com>
Sent: Monday, May 21, 2012 8:15 AM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder; Katie Jones
Subject: Vacuum Jct. E-25 (1R425-44) Photo Documentation
Attachments: Vacuum Jct. E-25 (1R425-44) Photo Documentation.pdf

Mr. Hansen,

Attached is the photo documentation for the Vacuum Jct. E-25 (1R425-44) site as requested.

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

Thank you,
Laura Peña

Vacuum Jct. E-25 (1R425-44)
Unit E, Section 25, T17S, R35E



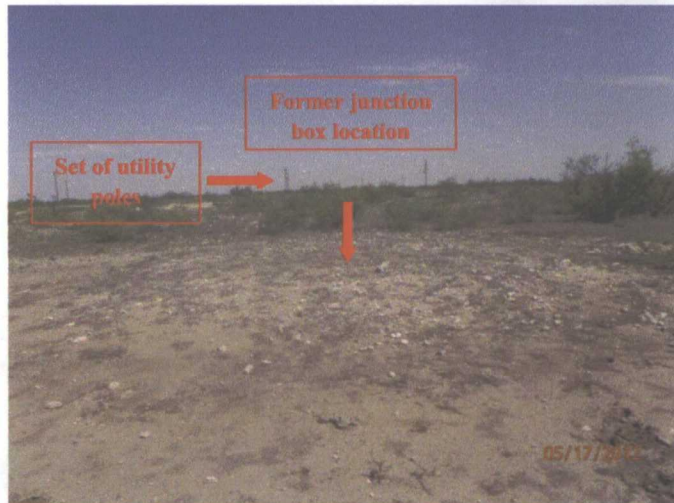
Facing north

6/30/2005



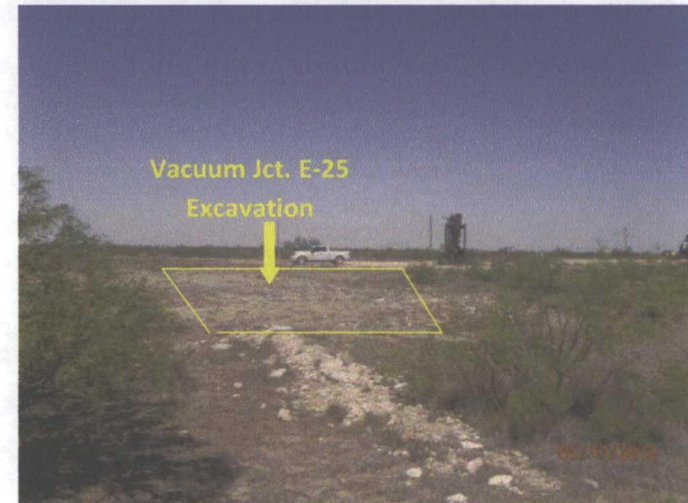
Facing northwest

4/25/2006



Facing north

5/17/2012



Facing northwest

5/17/2012