

1R - 425-58

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, June 11, 2012 5:50 PM
To: Hack Conder (hconder@riceswd.com)
Cc: Leking, Geoffrey R, EMNRD; Laura Pena (lpena@riceswd.com); Scott Curtis (scurtis@riceswd.com)
Subject: Remediation Plan (1R425-58) Termination - ROC Vacuum Jct O-33 Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum Jct O-33 Site
Unit Letter O, Section 33, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-58) 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 25, 2012 (received June 7, 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 (1R425-58) 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

JUN -7 2012

RICE *Operating Company*

122 West Taylor • Hobbs, New Mexico 88240
Phone: (575) 393-9174 • Fax: (575) 397-1471

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

May 25, 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. O-33 (1R425-58): UL/O, 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 2007, ROC initiated work on the former O-33 junction box as part of the system abandonment. The site is located in UL/O, Sec. 33, 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 5x3x9-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 9-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 128 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 2/28/2008, 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", written in a cursive style.

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	Jct. O-33	O	33	17S	35E	Lea	no box; system abandonment		

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

Depth to Groundwater 50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 3 20

Date Started 9/28/2007 Date Completed 2/28/2008 OCD Witness no

Soil Excavated 5 cubic yards Excavation Length 5 Width 3 Depth 9 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 2/13/2008 Sample Depth 9 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	Chloride mg/kg
SOURCE 9' GRAB	0.0	<10.0	<10.0	128

LOCATION	DEPTH	mg/kg
background	6"	149
vertical delineation trench at the junction (source)	5'	182
	6'	84
	7'	112
	8'	138
	9'	189

General Description of Remedial Action: This junction was eliminated during the Vacuum SWD system abandonment. After the former box was removed, an investigation was conducted using a backhoe to collect soil samples at regular intervals producing a 5x3x9-ft-deep excavation. Field data suggest the site is low in organic vapors and chloride concentrations are similar to that of the background. The deepest sample, 9 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 as a top cap and to contour the site to the surrounding area. On 2/28/2008, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

enclosures: photos, lab results, PID field screening

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 12-5-08

Vacuum Jct. O-33

Unit O, Section 33, T17S, R35E



undisturbed junction box, facing north

11/4/2005

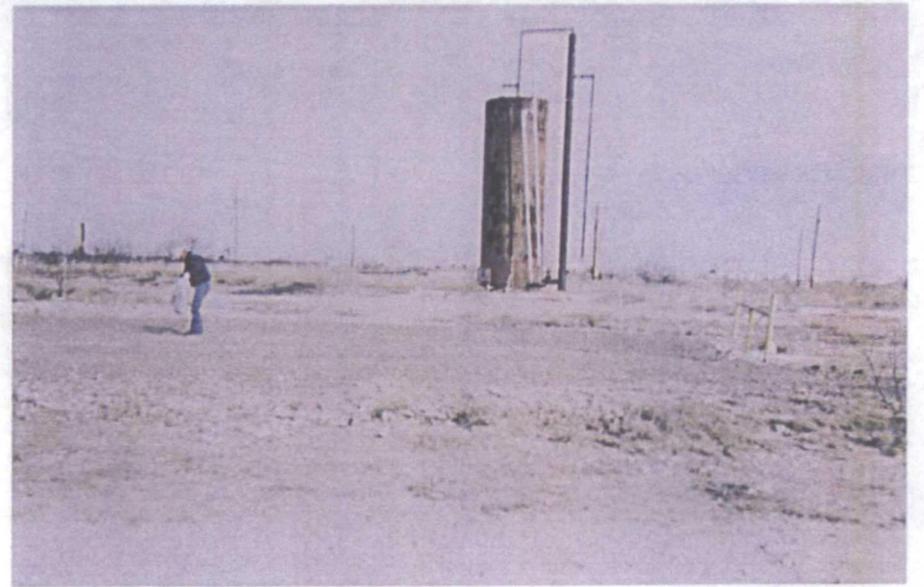


delineation trench at former junction site, facing east 2/13/2008



backfilled with clean, imported soil, facing west

2/28/2008

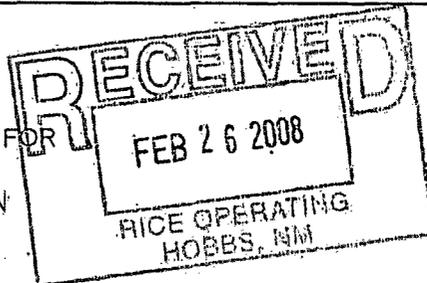


seeding backfilled site, facing north

2/28/2008



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

Receiving Date: 02/13/08
 Reporting Date: 02/15/08
 Project Owner: NOT GIVEN
 Project Name: VAC. JCT. O-33
 Project Location: NOT GIVEN

Sampling Date: 02/13/08
 Sample Type: SOIL
 Sample Condition: COOL & INTACT
 Sample Received By: ML
 Analyzed By: CK/KS

Handwritten initials: RPY

LAB NUMBER SAMPLE ID.	GRO (C ₆ -C ₁₀) (mg/kg)	DRO (>C ₁₀ -C ₂₈) (mg/kg)	Cl* (mg/kg)
ANALYSIS DATE	02/13/08	02/13/08	02/13/08
H14252-1 VERT. @ SOURCE @ 9' BGS	<10.0	<10.0	128
Quality Control	528	454	500
True Value QC	500	500	500
% Recovery	106	90.8	100
Relative Percent Difference	3.9	8.2	<0.1

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

Clyde D. Keane
 Chemist

02/15/08
 Date

H14252TCL 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	X
NO.	

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 : 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	O-33	O	33	17S	35E

SAMPLE ID	PID	SAMPLE ID	PID
VERT @ SOURCE @ 1'			
2'			
3'			
4'			
5'	0		
6'	0		
7'	0		
8'	0		
9'	0		
10'			
11'			
12'			

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

SIGNATURE: *Ray R. Larson*

DATE: 2-13-08