

1R - 425-95

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, July 31, 2012 9:43 AM
To: Hack Conder (hconder@riceswd.com)
Cc: Leking, Geoffrey R, EMNRD; Laura Pena (lpena@riceswd.com); Scott Curtis (scurtis@riceswd.com)
Subject: Remediation Plan (1R425-95) Termination - ROC Vacuum K-30 EOL Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum K-30 EOL Site
Unit Letter K, Section 30, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-95) 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 July 2, 2012 (received July 3, 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 (1R425-95) 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

JUL 3 2012

RICE *Operating Company* Oil Conservation Division
122 West Taylor • Hobbs, New Mexico 88240 1220 S. St. Francis Drive
Phone: (575) 393-9174 • Fax: (575) 397-1471 Santa Fe, NM 87505

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8654

July 2, 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 K-30 EOL (1R425-95): UL/K, 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 2010, ROC initiated work on the former K-30 EOL junction box as part of the system abandonment. The site is located in UL/K, Sec. 30, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 88 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 7x3x5-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 5-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 64 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 and contoured to the surrounding area. On 5/21/2010, 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, sweeping underline.

Hack Conder
Environmental Manager

enclosures

Vacuum K-30 EOL

Unit K, Section 30, T17S, R35E



Site prior to delineation

4/19/2010



Collecting sample

4/19/2010



Backfilling excavation

4/20/2010



Seeding excavation

5/21/2010



ARDINAL LABORATORIES

PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88249

ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: BRUCE BAKER
112 W. TAYLOR
HOBBS, NM 88240

Receiving Date: 04/20/10
Reporting Date: 04/22/10
Project Number: NOT GIVEN
Project Name: VAC. S.W.D. K-30 EOL (17S/35E)
Project Location: VAC. S.W.D. K-30 EOL (17S/35E)

Sampling Date: 04/19/10
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: JH
Analyzed By: AB/SJ

LAB NUMBER	SAMPLE ID	GRO	DRO	CI*
		(C ₆ -C ₁₀) (mg/kg)	(>C ₁₀ -C ₂₉) (mg/kg)	(mg/kg)

ANALYSIS DATE	04/22/10	04/22/10	04/20/10
H19705-1 SOURCE GRAB @ 5'	<10.0	<10.0	64
Quality Control	524	533	500
True Value QC	500	500	500
% Recovery	105	107	100
Relative Percent Difference	2.5	0.6	< 0.1

METHODS: TPH GRO & DRO: EPA-SW-846 801.5 M; CI: Std. Methods 4500-CI/B

*Analysis performed on a 1:4 w/v aqueous extract.

Reported on wet weight.

Bruce Baker

Chemist

COPY

04/23/10

Date

H19705 TCL 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 rendered by Cardinal, regardless of whether or 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: (575) 393-9174 FAX: (575) 397-1471
 PID METER CALIBRATION & FIELD REPORT FORM

Check Model Number:

X

Model: PGM 7300 Serial No: 590-000183
 Model: PGM 7300 Serial No: 590-000508
 Model: PGM 7300 Serial No: 590-000504

Model: PGM 7600 Serial No: 110-023920
 Model: PGM 7600 Serial No: 110-013744
 Model: PGM 7600 Serial No: 110-013676

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO : 927041	EXPIRATION DATE: 11-16-2012
FILL DATE: 11-13-09	METER READING ACCURACY: 100 ppm

ACCURACY : +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
Vacuum	K-30 EOL	K	30	17S	35E

SAMPLE ID	PID	SAMPLE ID	PID
Background	1.1	Source @ 1'	0.7
		2'	0.7
		3'	0.7
		4'	0.4
		5'	0.3

COPY

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

SIGNATURE:

DATE: 11-19-10