

1R - 425-97

**APPROVALS**

**YEAR(S):**

2012

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**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Tuesday, July 31, 2012 10:33 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 (1R425-97) Termination - ROC Vacuum E-25 EOL Site

**RE: Termination Request  
for the Rice Operating Company's  
Vacuum E-25 EOL Site  
Unit Letter E, Section 25, T17S, R35E, NMPM, Lea County, New Mexico  
Remediation Plan (1R425-97) 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 (1R425-97) 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*

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

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 E-25 EOL (1R425-97): 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 2010, ROC initiated work on the former E-25 EOL 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 43 +/- 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 48 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 3/3/2011, 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



# Vacuum E-25 EOL

Unit E, Section 25, T17S, R35E



Site prior to delineation

4/26/2010



Collecting sample

4/26/2010



Backfilling excavation

4/26/2010



Seeding excavation

3/03/2011



# ARDINAL LABORATORIES

PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

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

Receiving Date: 04/27/10  
Reporting Date: 04/29/10  
Project Number: NOT GIVEN  
Project Name: VAC. E-25 EOL  
Project Location: VAC. E-25 EOL

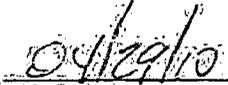
Sampling Date: 04/26/10  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: JH  
Analyzed By: AB/HM

LAB NUMBER	SAMPLE ID	GRO	DRO	CI*
		(C <sub>6</sub> -C <sub>10</sub> )	(>C <sub>10</sub> -C <sub>28</sub> )	(mg/kg)
		(mg/kg)	(mg/kg)	(mg/kg)

ANALYSIS DATE	04/29/10	04/29/10	04/28/10
H19757-1 SOURCE GRAB @ 5FT.	<10.0	<10.0	48
Quality Control	595	598	490
True Value QC	500	500	500
% Recovery	119	120	98.0
Relative Percent Difference	0.2	1.6	2.0

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

  
\_\_\_\_\_  
Chemist

  
\_\_\_\_\_  
Date: 04/29/10

H19757 TCL RICE

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# CARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603  
(505) 393-2326, FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: <u>Bill To</u>		ANALYSIS REQUEST																
Project Manager: <u>Bill To</u>		P.O. #:																
Address: <u>122 W. T. Jones Rd</u>		Company:																
City: <u>Hobbs</u> State: <u>NM</u> Zip: <u>88240</u>		Attn:																
Phone #: <u>505-393-2326</u> Fax #: <u>505-393-2476</u>		Address:																
Project #: _____ Project Owner: _____		City:																
Project Name: <u>SI - E-35 EN</u>		State: _____ Zip: _____																
Project Location: _____		Phone #: _____																
Sampler Name: <u>Bill To</u>		Fax #: _____																
Lab I.D.	Sample I.D.	# CONTAINERS	MATRIX					PRESERV.		SAMPLING		DATE	TIME	CUT	TYP	SPTS	M	
			GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	DIET	COOL	ICE/COOL	OTHER							
<u>419157</u>	<u>SI - E-35 EN</u>	<u>1</u>			<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		<u>4/26/10</u>	<u>9:00</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			

PLEASE NOTE: Liability and Damages. Cardine's liability for any and all damages, including but not limited to the recovery of the cost of the analysis, shall be limited to the amount paid by the client for the analysis. Cardine shall not be liable for any and all damages, including but not limited to the recovery of the cost of the analysis, shall be limited to the amount paid by the client for the analysis.

Relinquished By: _____	Date: _____	Received By: _____	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #: _____
Relinquished By: _____	Date: <u>4/27/10</u>	Received By: <u>Jodi Jensen</u>	Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #: _____
Delivered By: (Circle One)	Time: <u>1:50</u>	Sample Condition: Cool <input type="checkbox"/> Intact <input type="checkbox"/>	REMARKS: <u>Email results to Bill To @ Free Subl. Com. and recorder @ Free Subl. Com.</u>	
Sampler: <u>UPS</u> <input type="checkbox"/> <u>Bus</u> <input type="checkbox"/> <u>Other</u> <input type="checkbox"/>		Checked by: <u>JH</u>		

\* Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

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