

1R - 428-61

REPORTS

DATE:

2-21-11

R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266-0745

February 21, 2011

Mr. Edward J. Hansen
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
Via E-mail

RE: Termination Request
Hobbs Jct. P-31, NMOCD Case #1R428-61
Township 18S, Range 38E, Section 31, Unit P

Mr. Hansen,

R.T. Hicks Consultants, Ltd. is submitting this Termination Request on behalf of Rice Operating Company (ROC) for the above-referenced site. The investigation demonstrated that neither chloride nor hydrocarbons are present in the vadose zone in quantities that represent a threat to fresh water or the environment.

Background

The Hobbs Jct. P-31 site is located west of the city of Hobbs at Township 18S, Range 38E, Section 31, Unit P. The original junction box and equipment is believed to have been removed during system abandonment prior to 2002 but not specifically documented. A community church is located 80 yards to the southeast of the site; this gave the site additional priority for further delineation. The Investigation & Characterization Plan (ICP), dated January 20, 2010 and approved by the NMOCD on January 21, 2010 is included as Attachment A. The ICP includes background information and a site vicinity map for this and three other nearby ROC sites.

Field Program

On February 1, 2010, ROC installed a single 8-foot deep sampling trench at the location of the original junction box. Soil samples were recovered at 1-foot intervals from four feet to eight feet below ground surface and field screened for chlorides by titration and hydrocarbons using a photoionization detector (PID).

The field screening results indicate that the greatest chloride concentration (114 mg/kg) was encountered at 1 foot below ground surface. No hydrocarbon concentrations were detected using a PID at any depth (0 ppm from 1-8 feet bgs). Based on the guidelines included with the ICP, no additional trenches or soil borings were required for delineation. The trench was backfilled using soil from the trench and 12 yards of sand. The area was graded to match the surrounding area (see photos in Attachment B). The chloride results returned by the ROC investigation in 2010 are consistent with the chloride concentration results from the ROC investigation of 2002. The low PID vapor readings provide evidence relating to the lack of regulated hydrocarbons (e.g. BTEX) and are consistent with many other junction box investigations.

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February 21, 2011

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Confirmation laboratory analysis for chloride was performed on the 1- and 8-foot samples; and found no chloride above laboratory detection limits (<16 mg/kg) in either sample. The laboratory results and chain-of-custody as well as the field documentation of the backhoe excavation are provided in Attachment B. Manual re-seeding was impractical because of the P-31 former junction box is adjacent to an active loading/unloading area.

Recommendations

The ROC trench sampling information is evidence that this site is in compliance with the requirements of 19.15.29 NMAC such that soil at the site does not and will not endanger public health or the environment. We recommend termination of the regulatory file.

ROC is the service provider (agent) for the Hobbs Saltwater Disposal System and has no ownership of any portion of pipeline, well, or facility. A consortium of oil producers that own the Hobbs System (System Parties) provides all operating capital on a percentage ownership/usage basis. The Hobbs SWD system is in abandonment.

Sincerely,
R.T. Hicks Consultants, Ltd.

A handwritten signature in cursive script that reads "Katie Lee".

Katie Lee
Project Scientist

Copy: Hack Conder, Rice Operating Company

Attachment A

Approved 2010 ICP

R.T. Hicks Consultants, Ltd.

901 Rio Grande Blvd. NW, Suite F-142
Albuquerque, NM 87104

Katie Lee

From: Hansen, Edward J., EMNRD [edwardj.hansen@state.nm.us]
Sent: Thursday, January 21, 2010 5:13 PM
To: Hack Conder
Cc: Leking, Geoffrey R, EMNRD; Katie Lee
Subject: ICP Approval for Rice Hobbs SWD Jct P-31 (1R428-61)

Dear Mr. Conder:

The New Mexico Oil Conservation Division (OCD) has reviewed the submitted Investigation Characterization Plans (ICP), dated January 20, 2010, for the above-referenced site. The OCD hereby conditionally approves the following ICP for the Rice Operating Company (ROC) site:

Rice Hobbs SWD Jct P-31 submitted by R. T. Hicks on 1/21/2010 #1R428-61

If groundwater (including the capillary fringe) is encountered, then ROC must install at least one monitoring well. (Additional monitoring wells may be required if any WQCC standard is exceeded.) The groundwater must be analyzed for chloride, sulfate and TDS (and BTEX if warranted).

Also, please be advised that OCD approval of this plan 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 questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

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2/2/2010

R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266.0745

January 20, 2010

Mr. Edward J. Hansen
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**RE: Investigation & Characterization Plan
Hobbs Jct. P-31, NMOCD Case # 1R428-61
Township 18S, Range 38E, Section 31, Unit P**

Dear Mr. Hansen:

On behalf of Rice Operating Company (ROC), R.T. Hicks Consultants, Ltd. is pleased to submit this Investigation & Characterization Plan (ICP) for the Hobbs Jct. P-31 site. Plate 1 is a map showing the site relative to major roads in the area. Plate 2 shows the site, nearby USGS monitoring wells, and a regional potentiometric surface map.

The work elements proposed below will allow us to characterize this site and develop an appropriate corrective action plan.

1. ROC will identify and document the location of all current and historic equipment and pipelines associated with the site.
2. ROC will use a backhoe with a 12-foot vertical reach to install a series of sampling trenches in order to recover soil samples and delineate the lateral extent (and potentially the vertical extent) of impacted soil.
3. If characterization by the backhoe is insufficient to define the extent and magnitude of past releases, ROC and Hicks Consultants will use a drilling rig to drill one soil boring at the center of the source area to delineate the vertical extent of chloride in the soil.
4. Soil samples obtained by the backhoe or drilling rig will be obtained from regular intervals below ground surface.
5. Representative soil samples will be sent to a laboratory to allow for verification of the field chloride and PID results.
6. General soil texture descriptions will be provided for each sample trench or boring.
7. The criteria to delineate the extent of impact during trenching as well as in a soil boring is 5 point chloride decline vs. depth, or:
 - a. After three consecutive samples demonstrate <250 ppm chloride using field analyses and <100ppm total hydrocarbon vapors using the headspace method, or
 - b. After five consecutive samples show a decreasing trend of chloride and hydrocarbons and the last sample shows chloride < 250 ppm and total hydrocarbon vapors <100ppm.
 - c. Soil boring to capillary fringe should neither (a) or (b) apply.
8. If the boring penetrates the capillary fringe, a monitoring well will be considered for completion with a 2 or 4" diameter casing down gradient from confirmed impact for use during possible corrective actions. Plate 2 presents a potentiometric surface map for the site area.

January 20, 2010

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9. If field analysis of hydrocarbon vapors and observations of staining show that hydrocarbon impact is unlikely at the site or below 20-feet, collection of samples from cuttings may be substituted for split spoon sampling (chloride only).

The ROC trench characterization will be employed to identify the lateral extent of chloride at the site, if possible. If trenching does not fully characterize the lateral extent of chloride at the site, boreholes will be advanced 20 feet beyond the furthest trenches where the soil data has an average chloride concentration greater than 1,000 mg/kg. The total depth of borings drilled to characterize lateral extent shall be 20 feet below ground surface with soil samples for delineation taken at 5 foot intervals.

Rice Operating Company (ROC) is the service provider (agent) for the Hobbs Saltwater Disposal System and has no ownership of any portion of pipeline, well, or facility. A consortium of oil producers who own the Hobbs System (System Parties) provide all operating capital on a percentage ownership/usage basis. Major projects require System Parties' authorization for expenditures (AFE) approval and work begins as funds are received. We will implement the work outlined herein after NMOCD approval and subsequent authorization from the System Parties. The Hobbs SWD system is in abandonment.

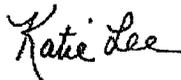
For all environmental projects, ROC will choose a path forward that:

1. Protects public health,
2. Provides the greatest net environmental benefit,
3. Complies with NMOCD Rules,
4. Is supported by good science.

Following the site characterization described above, a Corrective Action Plan with the data and analysis supportive of a procedure for site file termination, or a termination request will be submitted, depending on characterization findings.

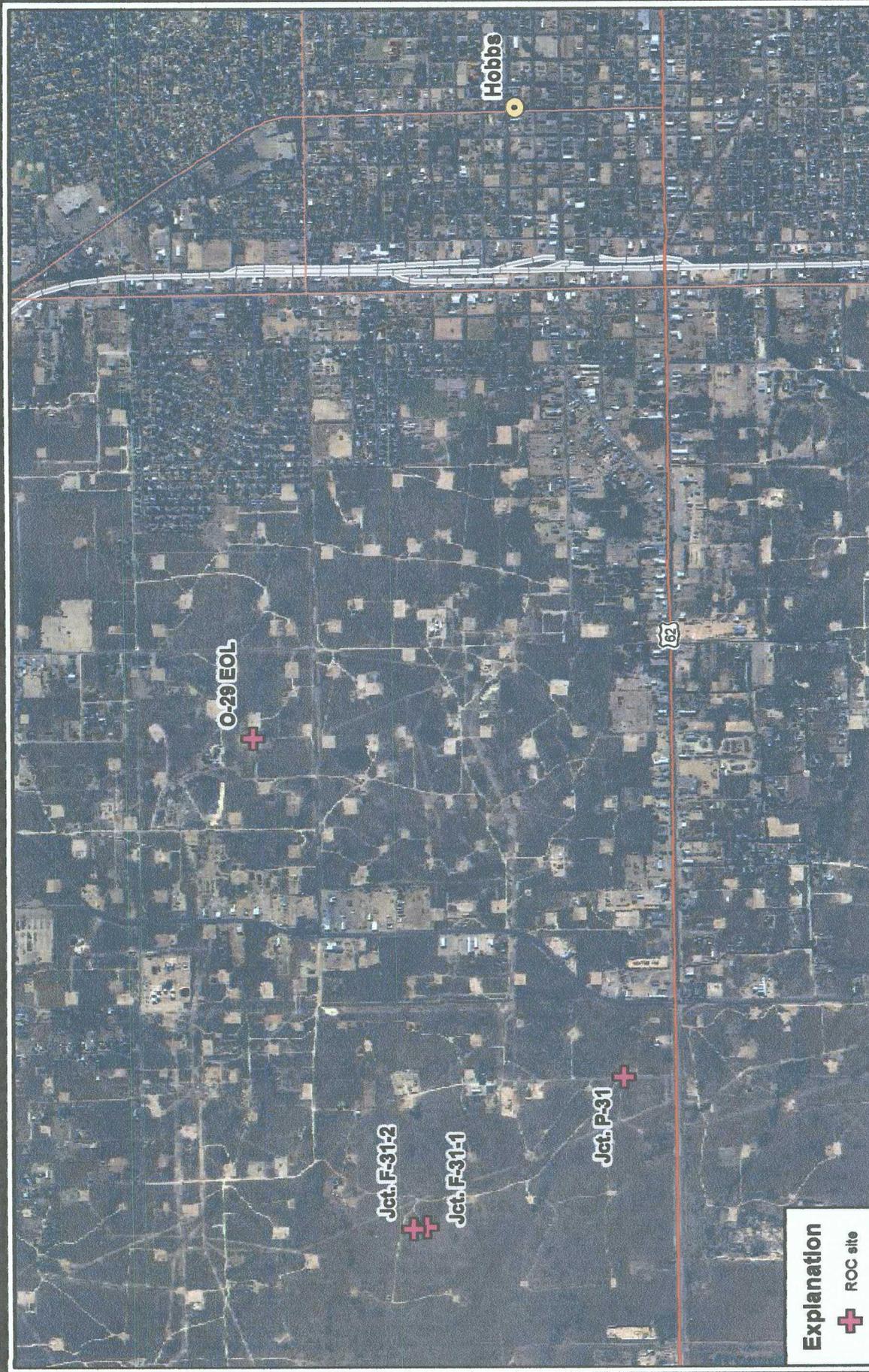
Please contact Hack Conder of ROC at 575-393-9174 if you have any questions concerning this submission. Thank you for your time and consideration.

Sincerely,
R.T Hicks Consultants, Ltd.



Katie Lee
Project Scientist

Copy: Hack Conder, ROC



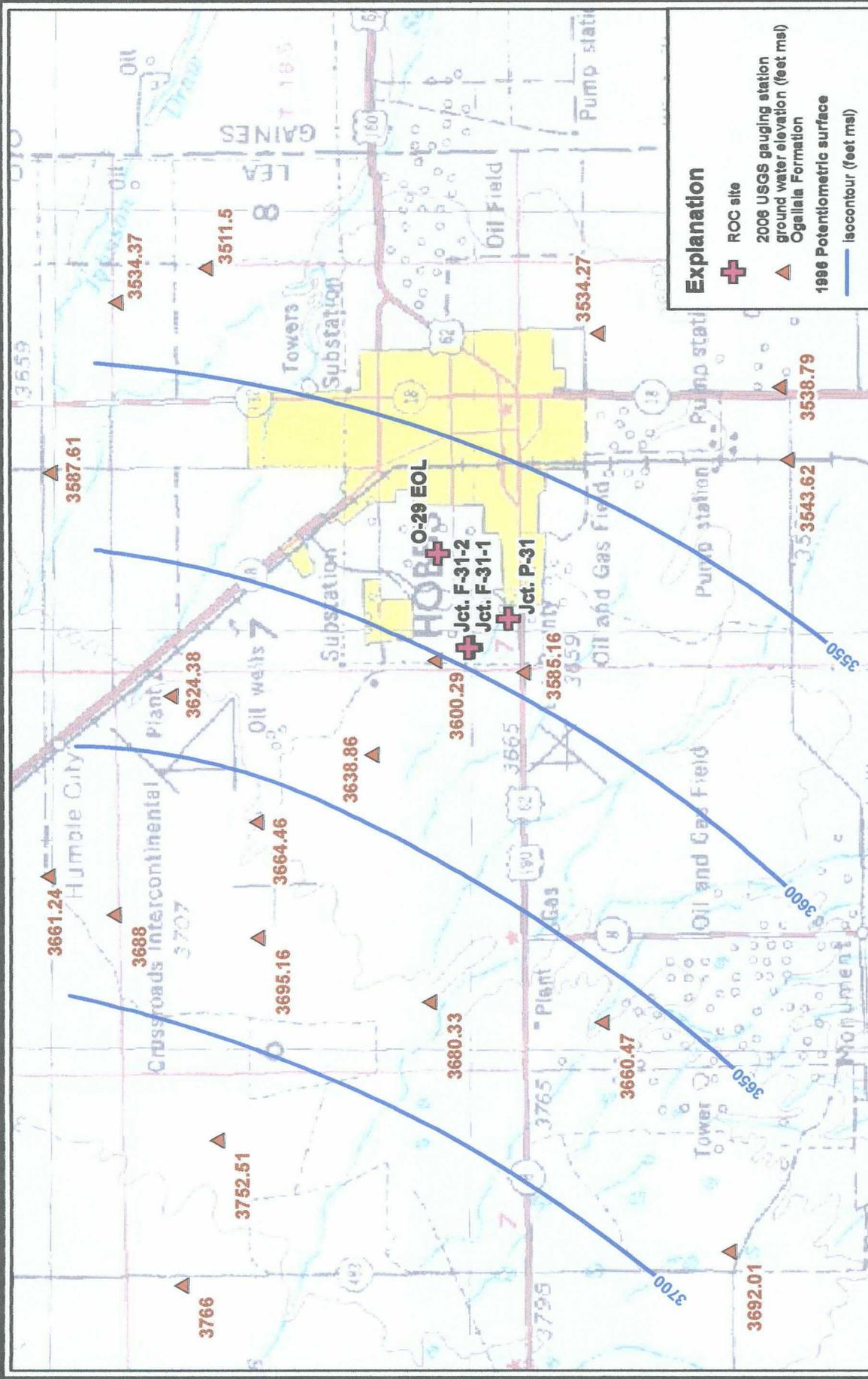
Explanation
 ROC site



R.T. Hicks Consultants, Ltd
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 Albuquerque, NM 87104
 Ph: 505.266.5004

Site Map - 2005 Aerial Photo (RGIS)
 O-29 EOL, Jct. F-31-1, Jct. F-31-2, and Jct. P-31
Rice Operating Company
 2010 Hobbs Investigation and Characterization Plan

Plate 1
 January 2010



Explanation

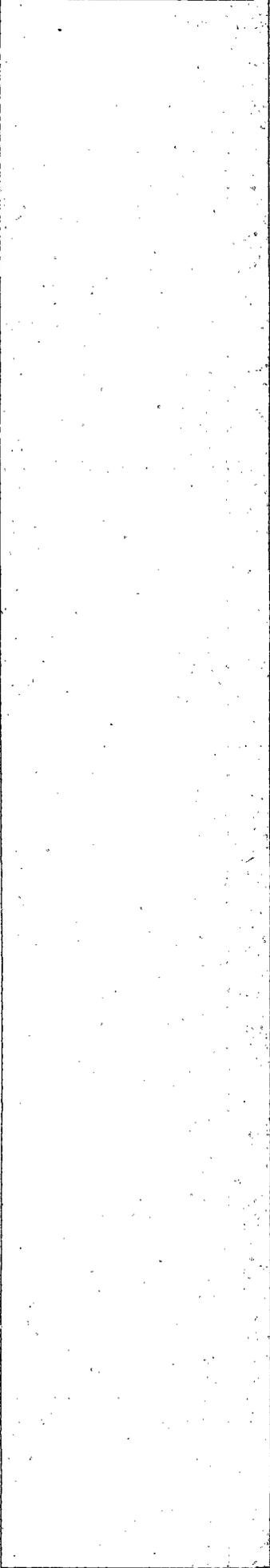
- + ROC site
- ▲ 2006 USGS gauging station ground water elevation (feet msl)
- 1996 Potentiometric surface
- Isocontour (feet msl)



R.T. Hicks Consultants, Ltd
 901 Rio Grande Blvd NW Suite F-142
 Albuquerque, NM 87104
 Ph: 505.266.5004

2006 Potentiometric Surface Map
 O-29 EOL, Jct. F-31-1, Jct. F-31-2, and Jct. P-31
 Rice Operating Company
 2010 Hobbs Investigation and Characterization Plan

Plate 2
 January 2010



Attachment B
Laboratory Results,
Field Documentation

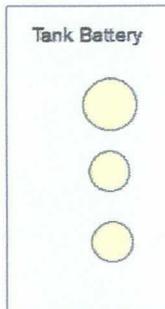
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Albuquerque, NM 87104

Backhoe delineation

32°41'55.192"N
103°10'58.791"W

former junction
box site



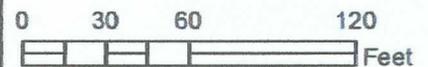
Depth	Cl-	PID	LAB Cl-	GRO	DRO
1	114	0	<16	<10	<10
2	96	0			
3	91	0			
4	96	0			
5	96	0			
6	94	0			
7	95	0			
8	85	0	<16	<10	<10



Hobbs jct. P-31

Legals: UL/P sec. 31
T18S R38E

Case #: 1R428-61



Drawing date: 12-10-10
Drafted by: L. Weinheimer



Site prior to excavation. The hole is approx. 2 feet deep. (facing north)



Beginning excavation at the source. (facing south)



Completed excavation to 8 feet bgs.



Backfilling the site. (facing south)



One load (12 yards) of sand delivered from Wallach (Eunice) to complete the backfill of the site. (facing north)



Completed site. (facing south)

ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: HACK CONDER
122 W. TAYLOR
HOBBS, NM 88240

Receiving Date: 02/02/10
Reporting Date: 02/04/10
Project Number: NOT GIVEN
Project Name: HOBBS JCT. P-31
Project Location: HOBBS JCT. P-31

Sampling Date: 02/01/10
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: JH
Analyzed By: AB/HM

LAB NUMBER	SAMPLE ID	GRO	DRO	CI*
		(C ₆ -C ₁₀) (mg/kg)	(>C ₁₀ -C ₂₈) (mg/kg)	CI* (mg/kg)
	ANALYSIS DATE	02/03/10	02/03/10	02/02/10
H19191-1	SOURCE @ 1'	<10.0	<10.0	< 16
H19191-2	SOURCE @ 8'	<10.0	<10.0	< 16
	Quality Control	515	430	500
	True Value QC	500	500	500
	% Recovery	103	86.0	100
	Relative Percent Difference	14.8	6.9	< 0.1

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



Chemist



Date

H19191 TCL RICE

