

1R - 425-21

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, April 11, 2012 2:09 PM
To: Hack Conder
Cc: Leking, Geoffrey R, EMNRD; 'Katie Jones'; Laura Pena
Subject: Remediation Plan (1R425-21) Termination - ROC Vacuum M-25 Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum M-25 Site
Unit Letter M, Section 25, T17S, R34E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-21) 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 March 27, 2012 (received April 9, 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 (1R425-21) 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

March 27, 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

RECEIVED

APR - 9 2012

RE: Termination Request
Vacuum M-25 (1R425-21): UL/M, Sec. 25, T17S, R34E
RICE Operating Company – Vacuum SWD System

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

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 M-25 junction box as part of the system abandonment. The site is located in UL/M, Sec. 25, T17S, R34E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 95 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 8x3x8-ft deep excavation. Each sample was field titrated for chlorides and field screen using a PID for hydrocarbons, resulting in low concentrations of each. The 8-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 59.3 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 and contoured to the surrounding area. On 12/2/2005, 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 NMOC

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	BOX DIMENSIONS - FEET		
Vacuum	M-25	M	25	17S	34E	Lea	Length	Width	Depth
							eliminated (SWD system abandoned)		

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

Depth to Groundwater 95 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 7/12/2005 Date Completed 7/26/2005 NMOCD Witness no

Soil Excavated 7 cubic yards Excavation Length 8 Width 3 Depth 8 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 7/13/2005 Sample Depth 8 ft

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 ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
GRAB @ 8 ft BGS	0.7	<10.0	<10.0	59.3

LOCATION	DEPTH (ft)	ppm
background	0.5	69
vertical trench at junction	2	204
	3	206
	4	200
	5	121
	6	149
	7	177
	8	142

General Description of Remedial Action: This junction was eliminated with the Vacuum SWD System Abandonment. The box was removed and the location was delineated using a backhoe to excavate an 8-ft-deep trench at the junction site. Chloride field tests and PID screenings were performed on every vertical foot of soil samples from 2-8 ft. Chloride concentrations were low and all below 250 ppm; the 8-ft sample yielded chloride at background concentration. All PID screenings were also low and TPH concentrations from the laboratory were non-detect (10.0 ppm). The soil samples did not exhibit any physical indications of hydrocarbon or salt impact and the location was surrounded by healthy native vegetation. The excavated soils were backfilled into the trench and contoured to the surrounding surface.

enclosures: chloride graph, photos, lab results, PID field screenings

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

SITE SUPERVISOR Jorge Hernandez SIGNATURE not available COMPANY RICE Operating Company

REPORT ASSEMBLED BY Kristin Farris Pope

SIGNATURE Kristin Farris Pope

DATE 9/1/2005

TITLE Project Scientist

Vacuum jct. M-25



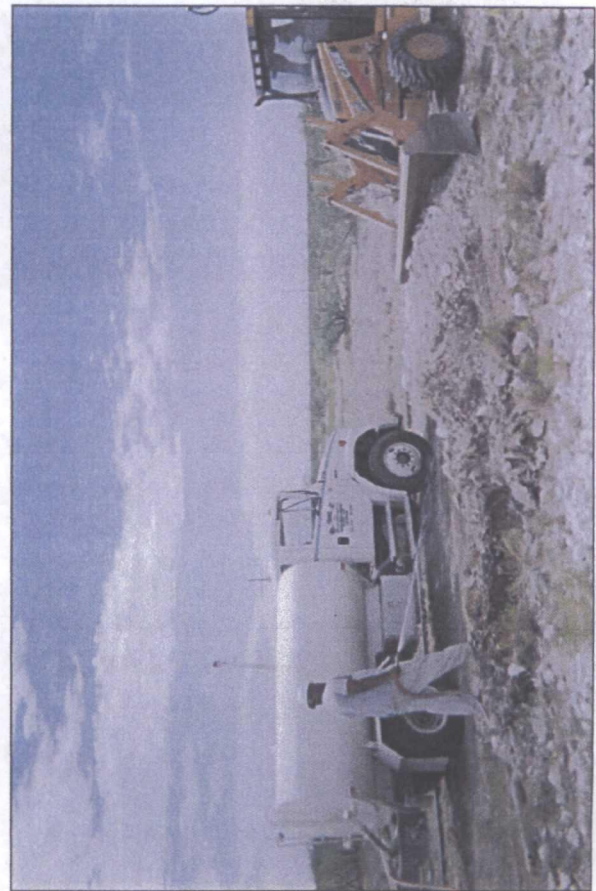
undisturbed junction box

7/12/2005



delineation trench at former junction box site

7/12/2005



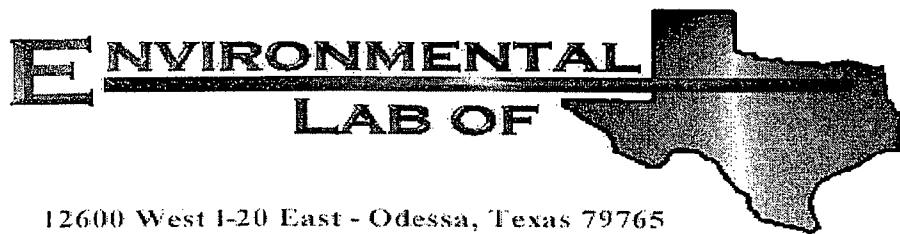
backfilling and compacting trench

7/26/2005



seeding backfilled site

12/2/2005



12600 West I-20 East - Odessa, Texas 79765

COPY

Analytical Report

Prepared for:

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

Project: Vacuum Jct. M-25
Project Number: None Given
Location: None Given

Lab Order Number: 5G14003

Report Date: 07/19/05

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

Project: Vacuum Jct. M-25
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
07/19/05 10:42

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Grab Bottom Sample@ 8'	5G14003-01	Soil	07/13/05 10:40	07/14/05 08:00

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

Project: Vacuum Jct. M-25
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
07/19/05 10:42

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Grab Bottom Sample@ 8' (5G14003-01) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EG51409	07/14/05	07/14/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		79.8 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		81.2 %	70-130		"	"	"	"	

Environmental Lab of Texas

The results in this report apply to the samples analyzed in accordance with the samples received in the laboratory. This analytical report must be reproduced in its entirety, with written approval of Environmental Lab of Texas.

Page 2 of 7

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

Project: Vacuum Jct. M-25
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
07/19/05 10:42

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

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Grab Bottom Sample@ 8' (5G14003-01) Soil									
Chloride	59.3	5.00	mg/kg	10	EG51904	07/18/05	07/18/05	EPA 300.0	
% Moisture	5.1	0.1	%	1	EG51505	07/14/05	07/15/05	% calculation	

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

Project: Vacuum Jct. M-25
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
07/19/05 10:42

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 EG51409 - Solvent Extraction (GC)

Blank (EG51409-BLK1)

Prepared & Analyzed: 07/14/05

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	36.0		mg/kg	50.0		72.0	70-130			
Surrogate: 1-Chlorooctadecane	35.6		"	50.0		71.2	70-130			

LCS (EG51409-BS1)

Prepared & Analyzed: 07/14/05

Gasoline Range Organics C6-C12	381	10.0	mg/kg wet	500		76.2	75-125			
Diesel Range Organics >C12-C35	389	10.0	"	500		77.8	75-125			
Total Hydrocarbon C6-C35	770	10.0	"	1000		77.0	75-125			
Surrogate: 1-Chlorooctane	39.6		mg/kg	50.0		79.2	70-130			
Surrogate: 1-Chlorooctadecane	35.4		"	50.0		70.8	70-130			

Calibration Check (EG51409-CCV1)

Prepared & Analyzed: 07/14/05

Gasoline Range Organics C6-C12	421		mg/kg	500		84.2	80-120			
Diesel Range Organics >C12-C35	445		"	500		89.0	80-120			
Total Hydrocarbon C6-C35	866		"	1000		86.6	80-120			
Surrogate: 1-Chlorooctane	57.5		"	50.0		115	70-130			
Surrogate: 1-Chlorooctadecane	50.2		"	50.0		100	70-130			

Matrix Spike (EG51409-MS1)

Source: 5G13011-08

Prepared & Analyzed: 07/14/05

Gasoline Range Organics C6-C12	486	10.0	mg/kg dry	548	ND	88.7	75-125			
Diesel Range Organics >C12-C35	573	10.0	"	548	43.2	96.7	75-125			
Total Hydrocarbon C6-C35	1060	10.0	"	1100	43.2	92.4	75-125			
Surrogate: 1-Chlorooctane	44.6		mg/kg	50.0		89.2	70-130			
Surrogate: 1-Chlorooctadecane	43.9		"	50.0		87.8	70-130			

Matrix Spike Dup (EG51409-MSD1)

Source: 5G13011-08

Prepared & Analyzed: 07/14/05

Gasoline Range Organics C6-C12	551	10.0	mg/kg dry	548	ND	101	75-125	12.5	20	
Diesel Range Organics >C12-C35	538	10.0	"	548	43.2	90.3	75-125	6.30	20	
Total Hydrocarbon C6-C35	1090	10.0	"	1100	43.2	95.2	75-125	2.79	20	
Surrogate: 1-Chlorooctane	52.8		mg/kg	50.0		106	70-130			
Surrogate: 1-Chlorooctadecane	41.6		"	50.0		83.2	70-130			

Environmental Lab of Texas

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

Project: Vacuum Jct. M-25
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
07/19/05 10:42

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
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Batch EG51505 - General Preparation (Prep)

Blank (EG51505-BLK1)

Prepared: 07/14/05 Analyzed: 07/15/05

% Moisture	ND	0.1	%							
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Duplicate (EG51505-DUP1)

Source: 5G14002-01

Prepared: 07/14/05 Analyzed: 07/15/05

% Moisture	11.0	0.1	%		9.5			14.6	20	
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Batch EG51904 - Water Extraction

Blank (EG51904-BLK1)

Prepared & Analyzed: 07/19/05

Chloride	ND	0.500	mg/kg							
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Blank (EG51904-BLK2)

Prepared & Analyzed: 07/19/05

Chloride	ND	0.500	mg/kg							
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LCS (EG51904-BS1)

Prepared & Analyzed: 07/18/05

Chloride	11.1		mg/L	10.0		111	80-120			
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LCS (EG51904-BS2)

Prepared & Analyzed: 07/19/05

Chloride	10.5		mg/L	10.0		105	80-120			
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Calibration Check (EG51904-CCV1)

Prepared & Analyzed: 07/18/05

Chloride	10.9		mg/L	10.0		109	80-120			
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Calibration Check (EG51904-CCV2)

Prepared & Analyzed: 07/18/05

Chloride	10.9		mg/L	10.0		109	80-120			
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Duplicate (EG51904-DUP1)

Source: 5G14002-01

Prepared & Analyzed: 07/18/05

Chloride	139	5.00	mg/kg		138			0.722	20	
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Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: Vacuum Jct. M-25
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
07/19/05 10:42

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
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Batch EG51904 - Water Extraction

Duplicate (EG51904-DUP2)

Source: 5G15012-08

Prepared & Analyzed: 07/18/05

Chloride	81.3	5.00	mg/kg		97.5			18.1	20	
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Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: Vacuum Jct. M-25
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
07/19/05 10:42

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: 7-19-05

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer

Jeanne Mc Murrey, Inorg. Tech Director
LaTasha Cornish, Chemist
Sandra Sanchez, Lab Tech.

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

Environmental Lab of Texas, Inc.

**12600 West I-20 East
Odessa, Texas 79763**

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: Roy Rascon

Project Name: Vacuum Set W-25

Company Name Rice Operating Company

Project #:

Company Address: 122 W Taylor

Project Loc: St-4-25

City/State/Zip: Hobbs, NM 88240

社

Telephone No: 505-393-9174

Fax No: 505-397-1471

Sampler Signature:

Agnes Edwards

[illegible]

Environmental Lab of Texas Variance / Corrective Action Report – Sample Log-In

Ident: Rice Op.

Date/Time: 7/14/05

Order #: SG14003

Initials: CK CK

Sample Receipt Checklist

Temperature of container/cooler?	Yes	No	-1.0	C
Shipping container/cooler in good condition?	<input checked="" type="checkbox"/>	No		
Custody Seals intact on shipping container/cooler?	<input checked="" type="checkbox"/>	No	Not present	
Custody Seals intact on sample bottles?	<input checked="" type="checkbox"/>	No	Not present	
Chain of custody present?	<input checked="" type="checkbox"/>	No		
Sample instructions complete on Chain of Custody?	<input checked="" type="checkbox"/>	No		
Chain of Custody signed when relinquished and received?	<input checked="" type="checkbox"/>	No		
Chain of custody agrees with sample labels.	<input checked="" type="checkbox"/>	No		
Container labels legible and intact?	<input checked="" type="checkbox"/>	No		
Sample Matrix and properties same as on chain of custody?	<input checked="" type="checkbox"/>	No		
Samples in proper container/bottle?	<input checked="" type="checkbox"/>	No		
Samples properly preserved?	<input checked="" type="checkbox"/>	No		
Sample bottles intact?	<input checked="" type="checkbox"/>	No		
Preservations documented on Chain of Custody?	<input checked="" type="checkbox"/>	No		
Containers documented on Chain of Custody?	<input checked="" type="checkbox"/>	No		
Sufficient sample amount for indicated test?	<input checked="" type="checkbox"/>	No		
All samples received within sufficient hold time?	<input checked="" type="checkbox"/>	No		
All samples have a zero headspace?	<input checked="" type="checkbox"/>	No	Not Applicable	

Other observations:

Variance Documentation:

Contact Person: _____ Date/Time: _____ Contacted by: _____
Regarding: _____

Corrective Action Taken:

Rice Operating Company

HOBBS, NEW MEXICO 88240

PHONE: (505) 393-9174 FAX: (505) 397-1471

VOC FIELD TEST REPORT FORM

COPY

MODEL NO: PGM 76IS
CALIBRATION GAS
GAS COMPOSITION: ISOBUTYLENE AIR

SERIAL NO: 104412

100 PPM

BALANCE

FILL DATE: 2-1-05

ACCURACY: ± 2%

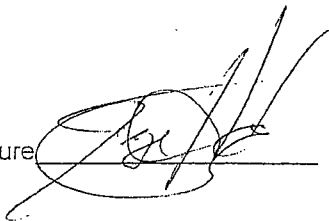
LOT NO: 04-2747
EXP. DATE: 8-1-06
METER READING
ACCURACY: 100

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
<u>Vacuum</u>	<u>m-25</u>	<u>M</u>	<u>25</u>	<u>17S</u>	<u>31E</u>

SAMPLE	PID RESULT	SAMPLE	PID RESULT
<u>Source @ 2'</u>	<u>68.8</u>		
<u>3'</u>	<u>40.0</u>		
<u>4'</u>	<u>29.2</u>		
<u>5'</u>	<u>13.4</u>		
<u>6'</u>	<u>4.1</u>		
<u>7'</u>	<u>1.9</u>		
<u>8'</u>	<u>0.7</u>		

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

Signature



Date 7-12-05