

1R - 425-25

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, April 23, 2012 1:30 PM
To: 'Hack Conder'
Cc: Leking, Geoffrey R, EMNRD; 'Katie Jones'; 'Laura Pena'; 'Scott Curtis'
Subject: Remediation Plan (1R425-25) Termination - ROC Vacuum Vent K-33 Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum Vent K-33 Site
Unit Letter K, Section 33, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-25) 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 April 13, 2012 (received April 20, 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 (1R425-25) 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

April 13, 2012

RECEIVED

Mr. Edward Hansen
New Mexico Energy, Minerals, & Natural Resources
Oil Conservation Division, Environmental Bureau
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

APR 20 2012

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

RE: Termination Request
Vacuum vent K-33 (1R425-25): UL/K, 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 2005, ROC initiated work on the former vent K-33 junction box as part of the system abandonment. The site is located in UL/K, Sec. 33, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 83 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating an 8x3x7-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 7-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 9.63 mg/kg, a gasoline range organics (GRO) concentration below detectable limits, and a diesel range organics (DRO) of 179 mg/kg. The excavated soil was blended on site then returned to the excavation to ground surface and contoured to the surrounding area. On 12/23/2005, 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 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 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		
							Length	Width	Depth
Vacuum	K-33 vent	K	33	17S	35E	Lea	System Abandonment--no box		

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

Depth to Groundwater 83 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 8/12/2005 Date Completed 12/20/2005 NMOCD Witness no

Soil Excavated 6 cubic yards Excavation Length 8 Width 3 Depth 7 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 9/1/2005 Sample Depth 7 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 @ 7 ft BGS	1.5	<10.0	179	9.63

LOCATION	DEPTH (ft)	ppm
vertical trench at junction	2	152
	3	141
	4	117
	5	151
	6	145
	7	146

General Description of Remedial Action:

This junction box was addressed as

part of the Vacuum SWD System Abandonment. After removing the box materials, a delineation trench was made using a backhoe while soil samples were collected at regular intervals to 7 ft BGS. Chloride field tests were conducted on each soil sample and exhibited low concentrations similar to background level. PID screenings were also performed on the samples and were also very low. A grab sample at 7 ft BGS was analyzed at a laboratory for confirmation of field tests. NMOCD TPH guidelines were met. The excavated soil was blended on site and then backfilled into the trench and contoured to the surrounding terrain. The disturbed surface was seeded with a blend of native vegetation and is expected to return to productive capacity at a normal rate.

enclosures: 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 1/6/2006 TITLE Project Scientist

Vacuum K-33 vent

Unit 'K', Sec. 33, T17S, R35E



undisturbed junction box

6/30/2005



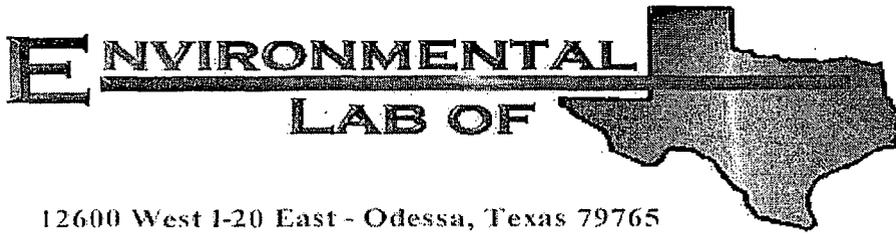
delineation trench at former box site

8/12/2005



seeding backfilled site

12/23/2005



12600 West 1-20 East - Odessa, Texas 79765

Analytical Report

Prepared for:

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

COPY

Project: Vacuum Vent K-33
Project Number: None Given
Location: None Given

Lab Order Number: 5I02011

Report Date: 09/08/05

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

Project: Vacuum Vent K-33
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
09/08/05 12:06

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Bottom Grab Sample @ 7'	5102011-01	Soil	09/01/05 10:00	09/02/05 14:00

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

Project: Vacuum Vent K-33
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
09/08/05 12:06

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Bottom Grab Sample @ 7' (5I02011-01) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EI50202	09/06/05	09/06/05	EPA 8015M	
Diesel Range Organics >C12-C35	179	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	179	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		115 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		117 %	70-130		"	"	"	"	

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

Project: Vacuum Vent K-33
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
09/08/05 12:06

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

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Bottom Grab Sample @ 7' (5102011-01) Soil									
Chloride	9.63	5.00	mg/kg	10	E150803	09/06/05	09/06/05	EPA 300.0	
% Moisture	11.8	0.1	%	1	E150608	09/02/05	09/06/05	% calculation	

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

Project: Vacuum Vent K-33
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
09/08/05 12:06

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 EI50202 - Solvent Extraction (GC)

Blank (EI50202-BLK1)		Prepared & Analyzed: 09/02/05								
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	46.2		mg/kg	50.0		92.4	70-130			
Surrogate: 1-Chlorooctadecane	50.0		"	50.0		100	70-130			

LCS (EI50202-BS1)		Prepared & Analyzed: 09/02/05								
Gasoline Range Organics C6-C12	402	10.0	mg/kg wet	500		80.4	75-125			
Diesel Range Organics >C12-C35	437	10.0	"	500		87.4	75-125			
Total Hydrocarbon C6-C35	839	10.0	"	1000		83.9	75-125			
Surrogate: 1-Chlorooctane	56.4		mg/kg	50.0		113	70-130			
Surrogate: 1-Chlorooctadecane	57.3		"	50.0		115	70-130			

Calibration Check (EI50202-CCV1)		Prepared: 09/02/05 Analyzed: 09/03/05								
Gasoline Range Organics C6-C12	431		mg/kg	500		86.2	80-120			
Diesel Range Organics >C12-C35	459		"	500		91.8	80-120			
Total Hydrocarbon C6-C35	890		"	1000		89.0	80-120			
Surrogate: 1-Chlorooctane	54.9		"	50.0		110	0-200			
Surrogate: 1-Chlorooctadecane	45.1		"	50.0		90.2	0-200			

Matrix Spike (EI50202-MS1)		Source: 5I02003-01		Prepared & Analyzed: 09/02/05						
Gasoline Range Organics C6-C12	443	10.0	mg/kg dry	538	ND	82.3	75-125			
Diesel Range Organics >C12-C35	458	10.0	"	538	ND	85.1	75-125			
Total Hydrocarbon C6-C35	901	10.0	"	1080	ND	83.4	75-125			
Surrogate: 1-Chlorooctane	64.9		mg/kg	50.0		130	70-130			
Surrogate: 1-Chlorooctadecane	58.1		"	50.0		116	70-130			

Matrix Spike Dup (EI50202-MSD1)		Source: 5I02003-01		Prepared & Analyzed: 09/02/05						
Gasoline Range Organics C6-C12	412	10.0	mg/kg dry	538	ND	76.6	75-125	7.25	20	
Diesel Range Organics >C12-C35	440	10.0	"	538	ND	81.8	75-125	4.01	20	
Total Hydrocarbon C6-C35	852	10.0	"	1080	ND	78.9	75-125	5.59	20	
Surrogate: 1-Chlorooctane	64.6		mg/kg	50.0		129	70-130			
Surrogate: 1-Chlorooctadecane	58.3		"	50.0		117	70-130			

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 EI50608 - General Preparation (Prep)

Blank (EI50608-BLK1) Prepared: 09/02/05 Analyzed: 09/06/05										
% Solids	100		%							
Duplicate (EI50608-DUP1) Source: SI02008-01 Prepared: 09/02/05 Analyzed: 09/06/05										
% Solids	98.7		%		98.8			0.101	20	

Batch EI50803 - Water Extraction

Blank (EI50803-BLK1) Prepared & Analyzed: 09/06/05										
Chloride	ND	0.500	mg/kg							
LCS (EI50803-BS1) Prepared & Analyzed: 09/06/05										
Chloride	8.79		mg/L	10.0		87.9	80-120			
Calibration Check (EI50803-CCV1) Prepared & Analyzed: 09/06/05										
Chloride	9.35		mg/L	10.0		93.5	80-120			
Duplicate (EI50803-DUP1) Source: SI02011-01 Prepared & Analyzed: 09/06/05										
Chloride	9.61	5.00	mg/kg		9.63			0.208	20	

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

Project: Vacuum Vent K-33
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
09/08/05 12:06

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: 9-12-05

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.

This material is intended only for the use of the individual (s) or entity to whom it is addressed, and may contain information that is privileged and confidential.

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

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

Client: Rice Operating

Date/Time: 09-02-05 @ 1400

Order #: 5I02011

Initials: JMM

Sample Receipt Checklist

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

Other observations:

Variance Documentation:

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

Corrective Action Taken:
