

1R - 425-30

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, May 02, 2012 3:38 PM
To: Hack Conder (hconder@riceswd.com)
Cc: Leking, Geoffrey R, EMNRD; Katie Jones <kjones@riceswd.com> (kjones@riceswd.com); Laura Pena (lpena@riceswd.com); Scott Curtis (scurtis@riceswd.com)
Subject: Remediation Plan (1R425-30) Termination - ROC Vacuum BP Am. Prod. St. 'A' EOL Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum BP Am. Prod. St. 'A' EOL Site
Unit Letter M, Section 22, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-30) 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 27, 2012 (received May 1, 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 (1R425-30) 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

MAY - 1 2012

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

April 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

RE: Termination Request
Vacuum BP Am. Prod. St. 'A' EOL (1R425-30):
UL/M, Sec. 22, 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 BP American Prod. State 'A' EOL junction box as part of the system abandonment. The site is located in UL/M, Sec. 22, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 70 +/- 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 50.8 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The excavated soil was blended on site then returned to the excavation to ground surface and contoured to the surrounding area. On 3/21/2006, 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	BP American Prod. St. 'A' EOL	M	22	17S	35E	Lea	no box--System Abandonment		

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

Depth to Groundwater 70 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 7/29/2005 Date Completed 3/3/2006 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 7/29/2005 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	0.0	<10.0	<10.0	50.8

LOCATION	DEPTH (ft)	ppm
vertical delineation trench at junction	2	145
	3	147
	4	149
	5	150
	6	147
	7	115

General Description of Remedial Action:

This junction box was addressed as _____

part of the Vacuum SWD System Abandonment. After the box was removed, a backhoe was used to produce a delineation trench at the former junction as soil samples were collected at regular depth intervals to 7 ft BGS. Chloride field tests were conducted on each of the samples and yielded very low concentrations. PID screenings were also conducted on the samples and these concentrations were also very low. Soil samples did not exhibit any physical indications of adverse impact. The excavated soil was blended on site and then backfilled into the trench and leveled 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. Since the Vacuum SWD System has been abandoned, a junction box is no longer required here.

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 4/12/2006 TITLE Project Scientist



former junction box site flagged before excavation 7/11/2005

Vacuum BP American Prod. St. 'A' EOL

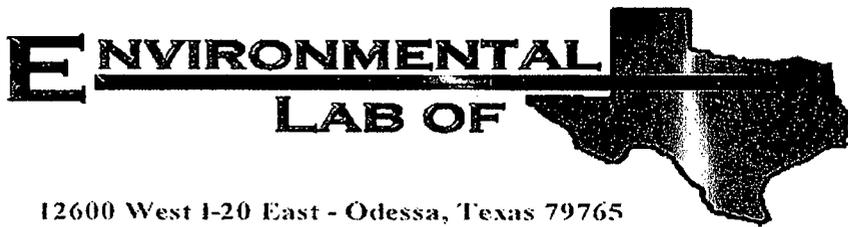
Unit 'M', Section 22, T17S, R35E



delineation trench at former box site 7/29/2005



seeding disturbed area after backfilling trench 3/21/2006



12600 West I-20 East - Odessa, Texas 79765

COPY

Analytical Report

Prepared for:

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

COPY

VACUUM BP AMERICAN Prod. St A - EOL

Project: BP American Prod./ Vacuum St. A EOL

Project Number: None Given

Location: None Given

Lab Order Number: 5H01006

Report Date: 08/04/05

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

Project: BP American Prod./ Vacuum St. A EOL
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
08/04/05 10:54

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Bottom Sample @ 7'	5H01006-01	Soil	07/29/05 10:35	07/29/05 17:45

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

Project: BP American Prod./ Vacuum St. A EOL
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
08/04/05 10:54

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Bottom Sample @ 7' (5H01006-01) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EH50101	08/01/05	08/01/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
<i>Surrogate: 1-Chlorooctane</i>		90.4 %	70-130		"	"	"	"	
<i>Surrogate: 1-Chlorooctadecane</i>		120 %	70-130		"	"	"	"	

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

Project: BP American Prod./ Vacuum St. A EOL
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
08/04/05 10:54

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

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Bottom Sample @ 7' (SH01006-01) Soil									
Chloride	50.8	5.00	mg/kg	10	EH50311	08/03/05	08/03/05	EPA 300.0	
% Moisture	9.5	0.1	%	1	EH50201	08/01/05	08/02/05	% calculation	

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

Project: BP American Prod./ Vacuum St. A EOL
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
08/04/05 10:54

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
Batch EH50101 - Solvent Extraction (GC)										
Blank (EH50101-BLK1) Prepared & Analyzed: 08/01/05										
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	43.9		mg/kg	50.0		87.8	70-130			
Surrogate: 1-Chlorooctadecane	59.9		"	50.0		120	70-130			
LCS (EH50101-BS1) Prepared & Analyzed: 08/01/05										
Gasoline Range Organics C6-C12	442	10.0	mg/kg wet	500		88.4	75-125			
Diesel Range Organics >C12-C35	447	10.0	"	500		89.4	75-125			
Total Hydrocarbon C6-C35	889	10.0	"	1000		88.9	75-125			
Surrogate: 1-Chlorooctane	49.7		mg/kg	50.0		99.4	70-130			
Surrogate: 1-Chlorooctadecane	62.8		"	50.0		126	70-130			
Calibration Check (EH50101-CCV1) Prepared & Analyzed: 08/01/05										
Gasoline Range Organics C6-C12	455		mg/kg	500		91.0	80-120			
Diesel Range Organics >C12-C35	451		"	500		90.2	80-120			
Total Hydrocarbon C6-C35	906		"	1000		90.6	80-120			
Surrogate: 1-Chlorooctane	56.1		"	50.0		112	0-200			
Surrogate: 1-Chlorooctadecane	64.3		"	50.0		129	0-200			
Matrix Spike (EH50101-MS1) Source: 5G29011-01 Prepared & Analyzed: 08/01/05										
Gasoline Range Organics C6-C12	459	10.0	mg/kg dry	542	ND	84.7	75-125			
Diesel Range Organics >C12-C35	558	10.0	"	542	51.3	93.5	75-125			
Total Hydrocarbon C6-C35	1020	10.0	"	1080	51.3	89.7	75-125			
Surrogate: 1-Chlorooctane	49.6		mg/kg	50.0		99.2	70-130			
Surrogate: 1-Chlorooctadecane	63.2		"	50.0		126	70-130			
Matrix Spike Dup (EH50101-MSD1) Source: 5G29011-01 Prepared & Analyzed: 08/01/05										
Gasoline Range Organics C6-C12	470	10.0	mg/kg dry	542	ND	86.7	75-125	2.37	20	
Diesel Range Organics >C12-C35	560	10.0	"	542	51.3	93.9	75-125	0.358	20	
Total Hydrocarbon C6-C35	1030	10.0	"	1080	51.3	90.6	75-125	0.976	20	
Surrogate: 1-Chlorooctane	50.0		mg/kg	50.0		100	70-130			
Surrogate: 1-Chlorooctadecane	62.3		"	50.0		125	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 4 of 6

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

Project: BP American Prod./ Vacuum St. A EOL
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471
Reported:
08/04/05 10:54

**General Chemistry Parameters by EPA / Standard Methods - Quality Control
Environmental Lab of Texas**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC Limits	RPD	RPD Limit	Notes
Batch EH50201 - General Preparation (Prep)									
Blank (EH50201-BLK1)					Prepared: 08/01/05 Analyzed: 08/02/05				
% Moisture	ND	0.1	%						
Duplicate (EH50201-DUP1)		Source: 5G29011-01			Prepared: 08/01/05 Analyzed: 08/02/05				
% Moisture	8.3	0.1	%		7.8		6.21	20	
Batch EH50311 - Water Extraction									
Blank (EH50311-BLK1)					Prepared & Analyzed: 08/03/05				
Chloride	ND	0.500	mg/kg						
LCS (EH50311-BS1)					Prepared & Analyzed: 08/03/05				
Chloride	10.1		mg/L	10.0		101	80-120		
Calibration Check (EH50311-CCV1)					Prepared & Analyzed: 08/03/05				
Chloride	10.4		mg/L	10.0		104	80-120		
Duplicate (EH50311-DUP1)		Source: 5H01003-01RE1			Prepared & Analyzed: 08/03/05				
Chloride	989	25.0	mg/kg		975		1.43	20	

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

Project: BP American Prod./ Vacuum St. A EOL
Project Number: None Given
Project Manager: Roy Rascon

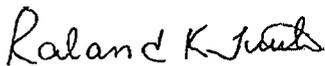
Fax: (505) 397-1471

Reported:
08/04/05 10:54

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:



Date:

8/4/2005

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 Co.

Date/Time: 08-01-05 @ 0915

Order #: 5401006

Initials: JMM

Sample Receipt Checklist

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

MODEL NO: PGM 761S
 CALIBRATION GAS
 GAS COMPOSITION: ISOBUTYLENE AIR

SERIAL NO: 104412

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

100 PPM
 BALANCE
 FILL DATE: 2-1-05
 ACCURACY: ± 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
VANADIA	B P AMERICAN Pod St A EOL	M	22	175	35E

Vert. @ Source

SAMPLE	PID RESULT	SAMPLE	PID RESULT
Source @ 2'	0.3		
3'	0.1		
4'	0.1		
5'	0.7		
6'	1.5		
7'	3.0		
	1		
* Sample Bottom @ 7'	2.9		

COPY

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

Signature

Jeff Hernandez

Date

7-29-05