1R - 425-20

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, May 09, 2012 9:03 AM
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 (1R425-20) Termination - ROC Vacuum Phillips 'B' Santa Fe EOL Site

RE: Termination Request
for the Rice Operating Company's
Vacuum Phillips 'B' Santa Fe EOL Site
Unit Letter O, Section 30, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-20) 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 17, 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 (1R425-20) 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 17, 2012

RECEIVED
APR 20 2012
Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

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 Phillips 'B' Santa Fe EOL (1R425-20): UL/O, Sec. 30, 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 Phillips 'B' Santa Fe EOL junction box as part of the system abandonment. The site is located in UL/O, Sec. 30, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 117 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating an 8x3x6-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 6-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 25.7 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 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

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	Phillips 'B' Santa Fe EOL	O	30	17S	35E	Lea	System Abandonment--no box		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER Duke Energy OTHER _____

Depth to Groundwater 117 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 9/6/2005 Date Completed 12/23/2005 NMOCD Witness no

Soil Excavated 5 cubic yards Excavation Length 8 Width 3 Depth 6 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 9/6/2005 Sample Depth 6 ft

TPH and chloride laboratory test results completed by using an approved laboratory and testing procedures pursuant to NMOCD guidelines.

Sample Location	PID ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
GRAB @ 6 ft BGS	0.0	<10.0	<10.0	25.7

CHLORIDE FIELD TESTS

LOCATION	DEPTH (ft)	ppm
vertical trench at junction	2	314
	3	93
	4	69
	5	100
	6	93
background	0	102

General Description of Remedial Action:

This junction box was addressed as part of the Vacuum SWD System Abandonment. After the box materials were removed, a delineation trench was made at the junction using a backhoe while soil samples were collected every ft of depth to 6 ft BGS. Chloride field tests conducted on the samples yielded low concentrations that exhibited a conclusive trend of decline with depth, indicative of unsaturated historical vadose conditions. PID screenings were also performed on the samples and yielded no VOC readings, all 0.0 ppm. The laboratory analysis of the deepest sample (6 ft) confirmed the field tests and TPH concentrations were not present within the lab's detection limits (<10.0 ppm), meeting NMOCD guidelines. 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. Since the SWD System is no longer active, a replacement box is not required at this site.

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 Roy Rascon SIGNATURE Roy L. Rascon COMPANY RICE Operating Company

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE Kristin Farris Pope

DATE 1/9/2006 TITLE Project Scientist

Vacuum Phillips 'B' Santa Fe EOL

Unit 'O', Sec. 30, T17S, R35E

undisturbed junction box 7/11/2005

junction box removed 9/2/2005

seeding backfilled site 12/23/2005

ENVIRONMENTAL LAB OF

12600 West I-20 East - Odessa, Texas 79765

Analytical Report

Prepared for:

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

Project: Vac. Phillips B Santa Fe EOL
Project Number: None Given
Location: None Given

Lab Order Number: 5I09002

Report Date: 09/15/05

Rice Operating Co.	Project: Vac. Phillips B Santa Fe EOL	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	09/15/05 15:50

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Vert.@ 6'	5I09002-01	Soil	09/06/05 14:16	09/09/05 07:30

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Rice Operating Co.	Project: Vac. Phillips B Santa Fe EOL	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	Reported:
Hobbs NM, 88240	Project Manager: Roy Rascon	09/15/05 15:50

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Vert.@ 6' (5I09002-01) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EI50912	09/09/05	09/11/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*85.6 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*82.4 %*	*70-130*		"	"	"	"	

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Rice Operating Co.	Project: Vac. Phillips B Santa Fe EOL	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	09/15/05 15:50

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

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Vert.@ 6' (5I09002-01) Soil									
Chloride	**25.7**	5.00	mg/kg	10	EI51507	09/14/05	09/14/05	EPA 300.0	
% Moisture	**19.0**	0.1	%	1	EI51214	09/09/05	09/13/05	% calculation	

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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 EI50912 - Solvent Extraction (GC)										
Blank (EI50912-BLK1)				Prepared: 09/09/05 Analyzed: 09/11/05						
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	*50.7*		*mg/kg*	*50.0*		*101*	*70-130*			
Surrogate: 1-Chlorooctadecane	*46.8*		*"*	*50.0*		*93.6*	*70-130*			
LCS (EI50912-BS1)				Prepared: 09/09/05 Analyzed: 09/11/05						
Gasoline Range Organics C6-C12	398	10.0	mg/kg wet	500		79.6	75-125			
Diesel Range Organics >C12-C35	379	10.0	"	500		75.8	75-125			
Total Hydrocarbon C6-C35	777	10.0	"	1000		77.7	75-125			
Surrogate: 1-Chlorooctane	*48.3*		*mg/kg*	*50.0*		*96.6*	*70-130*			
Surrogate: 1-Chlorooctadecane	*48.3*		*"*	*50.0*		*96.6*	*70-130*			
Calibration Check (EI50912-CCV1)				Prepared: 09/09/05 Analyzed: 09/12/05						
Gasoline Range Organics C6-C12	425		mg/kg	500		85.0	80-120			
Diesel Range Organics >C12-C35	412		"	500		82.4	80-120			
Total Hydrocarbon C6-C35	837		"	1000		83.7	80-120			
Surrogate: 1-Chlorooctane	*51.0*		*"*	*50.0*		*102*	*0-200*			
Surrogate: 1-Chlorooctadecane	*61.1*		*"*	*50.0*		*122*	*0-200*			
Matrix Spike (EI50912-MS1)	**Source: 5I09001-01**			Prepared: 09/09/05 Analyzed: 09/11/05						
Gasoline Range Organics C6-C12	403	10.0	mg/kg dry	533	ND	75.6	75-125			
Diesel Range Organics >C12-C35	406	10.0	"	533	ND	76.2	75-125			
Total Hydrocarbon C6-C35	809	10.0	"	1070	ND	75.6	75-125			
Surrogate: 1-Chlorooctane	*43.1*		*mg/kg*	*50.0*		*86.2*	*70-130*			
Surrogate: 1-Chlorooctadecane	*40.0*		*"*	*50.0*		*80.0*	*70-130*			
Matrix Spike Dup (EI50912-MSD1)	**Source: 5I09001-01**			Prepared: 09/09/05 Analyzed: 09/11/05						
Gasoline Range Organics C6-C12	403	10.0	mg/kg dry	533	ND	75.6	75-125	0.00	20	
Diesel Range Organics >C12-C35	402	10.0	"	533	ND	75.4	75-125	0.990	20	
Total Hydrocarbon C6-C35	805	10.0	"	1070	ND	75.2	75-125	0.496	20	
Surrogate: 1-Chlorooctane	*44.9*		*mg/kg*	*50.0*		*89.8*	*70-130*			
Surrogate: 1-Chlorooctadecane	*44.4*		*"*	*50.0*		*88.8*	*70-130*			

Rice Operating Co.	Project: Vac. Phillips B Santa Fe EOL	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	Reported:
Hobbs NM, 88240	Project Manager: Roy Rascon	09/15/05 15:50

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
Batch EI51214 - General Preparation (Prep)										
Blank (EI51214-BLK1)				Prepared: 09/09/05 Analyzed: 09/13/05						
% Solids	100		%							
Duplicate (EI51214-DUP1)		Source: 5I08021-02		Prepared: 09/09/05 Analyzed: 09/13/05						
% Solids	95.3		%		95.5			0.210	20	
Duplicate (EI51214-DUP2)		Source: 5I09013-05		Prepared: 09/09/05 Analyzed: 09/13/05						
% Solids	99.2		%		99.0			0.202	20	
Duplicate (EI51214-DUP3)		Source: 5I09010-03		Prepared: 09/09/05 Analyzed: 09/13/05						
% Solids	90.9		%		90.2			0.773	20	
Batch EI51507 - Water Extraction										
Blank (EI51507-BLK1)				Prepared & Analyzed: 09/14/05						
Chloride	ND	0.500	mg/kg							
LCS (EI51507-BS1)				Prepared & Analyzed: 09/14/05						
Chloride	8.62		mg/L	10.0		86.2	80-120			
Calibration Check (EI51507-CCV1)				Prepared & Analyzed: 09/14/05						
Chloride	9.06		mg/L	10.0		90.6	80-120			
Duplicate (EI51507-DUP1)		Source: 5I09001-01		Prepared & Analyzed: 09/14/05						
Chloride	801	10.0	mg/kg		796			0.626	20	

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

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: 9-18-05

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.

Environmental Lab of Texas, Inc.

12600 West I-20 East
Odessa, Texas 79763
Phone: 915-563-1800
Fax: 915-563-1713

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

ECC

Project Manager: Ray Rascon
Company Name: RICE Operating
Company Address: 122 W. Taylor
City/State/Zip: Hobbs, NM 88240
Telephone No: (505) 393-9174 Fax No: (505) 397-1471
Sampler Signature: Ray R. Rascon

Project Name: Vac Phillips B Santa Fe
Project #:
Project Loc:
PO #:

LAB # (lab use only)	FIELD CODE	Date Sampled	Time Sampled	No. of Containers	Preservative: Ice	HNO3	HCl	NaOH	H2SO4	None	Other (Specify)	Matrix: Water	Sludge	Soil	Other (specify)	Analyze For: TCLP: TDS (C) SAR / EC	TPH 418.1	TPH TX 1005/1006	TPH 8015M GRO/DRO	TOTAL: Metals: As Ag Ba Cd Cr Pb Hg Se	Volatiles	Semivolatiles	BTEX 8021B/5030	RUSH TAT (Pre-Schedule)
-01	Vert. @ 6'	9-6-05	1416	1	✓									✓		✓			✓					

Special Instructions:

Sample Containers Intact? (Y) N
Temperature Upon Receipt: 0.5 C
Laboratory Comments:
4oz glass on ice w/ labels + seals
seal on cooler

Relinquished by:	Date	Time	Received by:	Date	Time
Ray R. Rascon	9-7-05	16:21		9/8	
Relinquished by:	Date	Time	Received by ELOT: Drop Box	Date	Time
	9/9	7:00		9-9-5	0730

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

Client: Rice Op.

Date/Time: 9/9/05 7:30

Order #: 5I09002

Initials: CK

Sample Receipt Checklist

Temperature of container/cooler?	Yes	No	0.5 C
Shipping container/cooler in good condition?	Yes	No	
Custody Seals intact on shipping container/cooler?	Yes	No	Not present
Custody Seals intact on sample bottles?	Yes	No	Not present
Chain of custody present?	Yes	No	
Sample Instructions complete on Chain of Custody?	Yes	No	
Chain of Custody signed when relinquished and received?	Yes	No	
Chain of custody agrees with sample label(s)	Yes	No	
Container labels legible and intact?	Yes	No	
Sample Matrix and properties same as on chain of custody?	Yes	No	
Samples in proper container/bottle?	Yes	No	
Samples properly preserved?	Yes	No	
Sample bottles intact?	Yes	No	
Preservations documented on Chain of Custody?	Yes	No	
Containers documented on Chain of Custody?	Yes	No	
Sufficient sample amount for indicated test?	Yes	No	
All samples received within sufficient hold time?	Yes	No	
VOC samples have zero headspace?	Yes	No	Not Applicable

Other observations:

_____

_____

_____

Variance Documentation:

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

Regarding:

_____

_____

_____

Corrective Action Taken:

_____

_____

_____

_____

_____

_____

_____

_____

RICE OPERATING COMPANY

122 WEST TAYLOR
HOBBS, NEW MEXICO 88240
PHONE: (505) 393-9174 FAX: (505) 397-1471

VOC FIELD TEST REPORT FORM

MINI RAE PLUS CLASSIC PHOTOIONIZATION GAS DETECTOR

MODEL NO: PGM 761S
SERIAL NO: 104412
CALIBRATION GAS
GAS COMPOSITION: ISOBUTYLENE 100 PPM
AIR BALANCE
LOT NO: 04-2747
FILL DATE: 2-1-05
EXP. DATE: 8-1-06
ACCURACY: +/- 2%
METER READING
ACCURACY: 100.6

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
VAC	Phillips "B" Santa FE EOL	O	30	17S	35E

Vertical @ Source Only

SAMPLE	PID RESULT	SAMPLE	PID RESULT
2'	0.0		
3'	0.0		
4'	0.0		
5'	0.0		
6'	0.0		

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

Ray R. Rasco
Signature

9-6-05
Date