

1R - 425-55

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, May 24, 2012 1:43 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 (1R425-55) Termination - ROC Vacuum Jct J-34 Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum Jct J-34 Site
Unit Letter J, Section 34, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-55) 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 May 17, 2012 (received May 22, 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 (1R425-55) 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

May 17, 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 Jct. J-34 (1R425-55): UL/J, Sec. 34, T17S, R35E
RICE Operating Company – Vacuum SWD System

RECEIVED OGD
2012 MAY 22 A 10:39

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 2008, ROC initiated work on the former J-34 junction box as part of the system abandonment. The site is located in UL/J, Sec. 34, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 92 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x3x8-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 8-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 32 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 to ground surface. Clean, imported soil was used as a top cap and to contour the site to the surrounding area. On 5/20/2008, 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 stylized flourish at the end.

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 | Jct. J-34 | J | 34 | 17S | 35E | Lea | Length | Width | Depth |
| | | | | | | | no box; system abandonment | | |

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

Depth to Groundwater 92 feet NMOCD SITE ASSESSMENT RANKING SCORE: 30*

Date Started 4/30/2008 Date Completed 5/15/2008 OCD Witness no

Soil Excavated 4 cubic yards Excavation Length 5 Width 3 Depth 8 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 4/30/2008 Sample Depth .8 ft

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

CHLORIDE FIELD TESTS

| Sample Location | PID (field) ppm | GRO mg/kg | DRO mg/kg | Chlorides mg/kg |
|-----------------|-----------------|-----------|-----------|-----------------|
| SOURCE 8' GRAB | 0.0 | <10.0 | <10.0 | 32 |

| LOCATION | DEPTH | mg/kg |
|---|-------|-------|
| background | 6" | 112 |
| delineation trench at junction (source) | 4' | 122 |
| | 5' | 266 |
| | 6' | 174 |
| | 7' | 172 |
| | 8' | 119 |

General Description of Remedial Action: This junction was addressed under the Vacuum SWD System abandonment. After this junction was removed, an investigation was conducted using a backhoe to collect soil samples at regular intervals producing a 5x3x8-ft-deep hole. Chloride field tests were performed on each sample, which yielded low concentrations similar to that of the background. Organic vapors were measured using a PID, which also yielded low concentrations. The deepest sample, 8 ft BGS, was sent to a commercial laboratory for analysis of chloride and TPH, which confirmed low concentrations. The excavated soil was returned to the excavation and clean soil was imported to top cap the site and to contour to the surrounding area. On 5/20/2008, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

*One active stock well with small pond located 739 ft southeast of site.

*SPS well 26 located 1267 ft northeast of site.

enclosures: photos, lab results, PID screenings, chloride curve

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

SITE SUPERVISOR Roy Rascon SIGNATURE not available COMPANY RICE OPERATING COMPANY

REPORT

ASSEMBLED BY Katie Jones INITIAL KJ

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE Larry Bruce Baker Jr.

DATE 9-9-08

Vacuum Jct. J-34

Unit J, Section 34, T17S, R35E



undisturbed junction box, facing north

11/14/2005



delineation trench at former junction site

4/30/2008



backfilled excavation, facing north

5/15/2008



seeding backfilled site, facing east

5/20/2008



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

COPY

ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: ROY R. RASCON
122 W. TAYLOR
HOBBS, NM 88240
FAX TO: (575) 397-1471

Receiving Date: 04/30/08
Reporting Date: 05/06/08
Project Owner: NOT GIVEN
Project Name: VAC JCT J-34
Project Location: NOT GIVEN

Sampling Date: 04/30/08
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: ML
Analyzed By: CK/HM

| LAB NUMBER | SAMPLE ID | GRO (C ₆ -C ₁₀) (mg/kg) | DRO (C ₁₀ -C ₂₈) (mg/kg) | CI* (mg/kg) |
|-----------------------------|-----------------------|--|---|----------------|
| | | | | |
| ANALYSIS DATE | | 05/01/08 | 05/01/08 | 05/01/08 |
| H14726-1 | VERT @ SOURCE @ 8 BGS | <10.0 | <10.0 | 32 |
| | | | | |
| | | | | |
| | | | | |
| Quality Control | | 459 | 477 | 500 |
| True Value QC | | 500 | 500 | 500 |
| % Recovery | | 91.8 | 95 | 100 |
| Relative Percent Difference | | 12.5 | 1.6 | 2.0 |

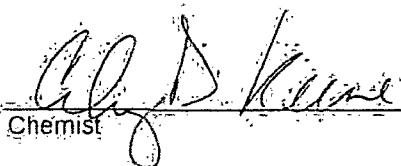
METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI: Std. Methods 4500 CI B

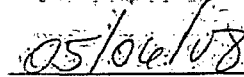
*Analysis performed on a 1:4 w/v aqueous extract.

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MAY 08 2008

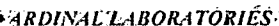
RICE OPERATING
HOBBS, NM


Chemist


Date

H14726TCL RICE

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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

2111 Beechwood, Abilene, TX 79603 101 East Marland, Hobbs, NM 88240
(325) 673-7001 FAX (325) 673-7020 (505) 393-2326 FAX (505) 393-2476

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| | | | | |
|---|--|---|--|--|
| Relinquished By: <i>Ray L. Rascon</i> | | Date: <i>4-30-08</i> | Received By: <i>Maty ReBut</i> | Phone Result: Yes No Add'l Phone #: |
| | | Time: <i>3:40</i> | | Fax Result: X Yes No Add'l Fax #: |
| Relinquished By: | | Date: | Received By: | |
| | | Time: | | |
| Delivered By: (Circle One) Sampler <input checked="" type="radio"/> UPS <input type="radio"/> Bus <input type="radio"/> Other: | | Sample Condition Cool <input checked="" type="radio"/> Intact <input checked="" type="radio"/> Yes Yes No No | CHECKED BY: (Initials) <i>LR</i> | REMARKS: PLEASE E-MAIL TO jpurvis & rrascon@riceswd.com |

REMARKS: PLEASE E-MAIL TO jpurvis &
rrascon@riceswd.com

† Cardinal cannot accept verbal changes: Please fax written changes to 505-393-2476

RICE OPERATING COMPANY

122 West Taylor Hobbs, NM 88240
PHONE: (505) 393-9174 FAX: (505) 397-1471
PID METER CALIBRATION & FIELD REPORT FORM

MODEL: PGM 7600 SERIAL # 110-013744

COPY

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

| | |
|---------------------|-------------------------------|
| LOT NO : 07-3353 | EXPIRATION DATE: 5-16-09 |
| FILL DATE: 11-16-07 | METER READING ACCURACY: 100.0 |

ACCURACY : +/- 2%

| SYSTEM | JUNCTION | UNIT | SECTION | TOWN SHIP | RANGE |
|--------|----------|------|---------|-----------|-------|
| VAC | JCT J-34 | J | 34 | 17S | 35E |

| SAMPLE ID | PID | SAMPLE ID | PID |
|-----------|-----|-----------|-----|
| 1' | | | |
| 2' | | | |
| 3' | | | |
| 4' | 1.8 | | |
| 5' | 0.2 | | |
| 6' | 0 | | |
| 7' | 0 | | |
| 8' | 0 | | |
| 9' | | | |
| 10' | | | |
| 11' | | | |
| 12' | | | |

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

SIGNATURE:

Roy P. Reason

DATE: 4-30-08