

1R - 425-57

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, June 12, 2012 10:59 AM
To: Hack Conder (hconder@riceswd.com)
Cc: Leking, Geoffrey R, EMNRD; Laura Pena (lpena@riceswd.com); Scott Curtis (scurtis@riceswd.com)
Subject: Remediation Plan (1R425-57) Termination - ROC Vacuum N-33 Vent Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum N-33 Vent Site
Unit Letter N, Section 33, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-57) 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 25, 2012 (received June 7, 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 (1R425-57) 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

JUN -7 2012

RICE *Operating Company*

122 West Taylor • Hobbs, New Mexico 88240

Phone: (575) 393-9174 • Fax: (575) 397-1471

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

May 25, 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 N-33 vent (1R425-57): UL/N, 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 2007, ROC initiated work on the former N-33 vent junction box as part of the system abandonment. The site is located in UL/N, Sec. 33, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 60 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x3x12-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 12-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 160 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. Clean, imported soil was used to backfill the excavation to ground surface and to contour the site to the surrounding area. On 5/22/2008, 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	N-33 vent	N	33	17S	35E	Lea	Length	Width	Depth
no box; system abandonment									

LAND TYPE: BLM STATE X FEE LANDOWNER OTHER

Depth to Groundwater 60 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 9/21/2007 Date Completed 5/22/2008 OCD Witness no

Soil Excavated 7 cubic yards Excavation Length 5 Width 3 Depth 12 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 4/7/2008 Sample Depth 12 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	Chloride mg/kg
SOURCE 12' GRAB	0.0	<10.0	<10.0	160

LOCATION	DEPTH	mg/kg
source lab sample 4/7/2008	12'	154
background	6"	179
vertical delineation trench at the junction (source)	8'	252
	9'	133
	10'	94
	11'	125
	12"	114

General Description of Remedial Action: This junction was eliminated during the Vacuum SWD system abandonment. After the former junction box was removed, an investigation was conducted using a backhoe to collect soil samples at regular intervals, producing a 5x3x12-ft-deep excavation. Field data suggest the site is low in organic vapors, and chloride concentrations are similar to that of the background sample. On 4/7/2008, the deepest sample (12 ft BGS) was sent to a commercial laboratory for analysis.

of chloride and TPH, confirming low concentrations. Clean, imported soil was used to backfill the excavation to ground surface and to contour the site to the surrounding area. On 5/22/2008, the site was re-seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

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 12-08-08

Vacuum N-33 vent

Unit N, Section 33, T17S, R35E



undisturbed junction box, facing north

10/31/2005



delineation trench at former junction site

2/08/2008



spreading clean, imported soil on site

3/20/2008



seeding backfilled site

3/20/2008



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

COPY

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

Receiving Date: 04/08/08
Reporting Date: 04/09/08
Project Owner: NOT GIVEN
Project Name: VAC. VENT'N-33
Project Location: NOT GIVEN

Sampling Date: 04/07/08
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: ML
Analyzed By: CK/KS

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/kg)	DRO (C ₁₀ -C ₂₈) (mg/kg)	CI* (mg/kg)
ANALYSIS DATE		04/08/08	04/08/08	04/08/08
H14594-1	VERT @ SOURCE @ 12'BGS	<10.0	<10.0	160
Quality Control		442	545	490
True Value QC		500	500	500
% Recovery		88.4	109	98.0
Relative Percent Difference		5.0	5.6	<0.1

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

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

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APR 14 2008

RICE OPERATING
HOBBS, NM

Chemist

Date

H14594-TCL RICE

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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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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Relinquished By: <i>Sgt. R. Rascon</i>	Date: <i>4-8-08</i>	Received By: <i>Misty LeBout</i>	Phone Result: Yes No Add'l Phone #:
	Time: <i>0849</i>		Fax Result: X Yes No Add'l Fax #:
Relinquished By:	Date:	Received By:	
	Time:		
Delivered By: (Circle One) <u>Sampler</u> - UPS - Bus - Other:	Sample Condition Cool Intact Yes Yes No No	CHECKED BY: (Initials) <i>MCB</i>	REMARKS: PLEASE E-MAIL TO jpurvis & rrescon@riceswd.com

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

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

COPY

CK.		MODEL: PGM 7600	SERIAL NO: 110-013676
MODEL	X	MODEL: PGM 7600	SERIAL NO: 110-013744
NO.		MODEL: PGM 7600	SERIAL NO: 110-012383
		MODEL: PGM 7600	SERIAL NO: 110-012920

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	VENT N-33	N	33	17S	35E

SAMPLE ID	PID	SAMPLE ID	PID
VERT @ SOURCE @ 1'			
2'			
3'			
4'			
5'			
6'			
7'			
8'			
9'			
10'			
11'			
LAB SAMPLE 12'	0		

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

SIGNATURE:

Ray R. Pearson

DATE: 4-7-08