1R - 425-73

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, June 18, 2012 5:55 PM
To: Hack Conder (hconder@riceswd.com)
Cc: Leking, Geoffrey R, EMNRD; Laura Pena (lpena@riceswd.com); Scott Curtis (scurtis@riceswd.com)
Subject: Remediation Plan (1R425-73) Termination - ROC Vacuum Jct E-8 Site

RE: Termination Request
for the Rice Operating Company's
Vacuum Jct E-8 Site
Unit Letter E, Section 8, T18S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-73) 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 June 1, 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 (1R425-73) 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

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

RICE *Operating Company*
122 West Taylor • Hobbs, New Mexico 88240
Phone: (575) 393-9174 • Fax: (575) 397-1471

CERTIFIED MAIL
RETURN RECEIPT NO. 7007 2560 0000 4569 8593

June 1, 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. E-8 (1R425-73): UL/E, Sec. 8, T18S, 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 2009, ROC initiated work on the former E-8 junction box as part of the system abandonment. The site is located in UL/E, Sec. 8, T18S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 89 +/- feet. The site was delineated using an air-rotary drilling rig to collect soil samples at regular intervals. 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 64 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The entire bore hole was filled with bentonite to ground surface. Clean, imported soil was used to contour the site to the surrounding area. On 6/25/2009, 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	Jct. E-8	E	8	18S	35E	Lea		eliminated	

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

Depth to Groundwater 89 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 6/18/2009 Date Completed 6/18/2009 OCD Witness no

Soil Excavated n/a cubic yards Excavation Length n/a Width n/a Depth n/a feet

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

FINAL ANALYTICAL RESULTS:

Sample Date 6/18/2009 **Sample Depth** 8 ft

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

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
SB #1 8' GRAB	0.1	<10.0	<10.0	64

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
background	6"	150
vertical delineation at the junction (source)	4'	128
	5'	145
	6'	144
	7'	118
	8'	113

General Description of Remedial Action: This junction was addressed during the Vacuum SWD System Abandonment. An investigation was conducted at the former junction box site using a air-rotary drilling rig to collect soil samples at regular intervals. Chloride field tests were performed on each sample which yielded low concentrations similar to that of the background sample. 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. Laboratory analysis confirmed low concentrations of each. The entire bore hole was backfilled with bentonite to the ground surface. Clean, imported soil was used to contour the site to the surrounding area. On 6/25/2009, the site was 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 (field) tests, chloride curve

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

SITE SUPERVISOR Jordan Woodfin SIGNATURE Jordan Woodfin COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Katie Jones INITIAL KJ

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE Larry Bruce Baker Jr. DATE 11-6-09

Vacuum Jct. E-8

Unit E, Section 8, T18S, R35E

drilling SB #1 at the former junction box 6/18/2009

plugging SB #1 with bentonite 6/18/2009

backfilling the former junction box site, facing northwest 6/25/2009

seeding backfilled site, facing east 6/25/2009

CARDINAL LABORATORIES

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

ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: DARNELL MITCHELL
122 W. TAYLOR
HOBBS, NM 88240

Receiving Date: 06/19/09
Reporting Date: 06/22/09
Project Number: NOT GIVEN
Project Name: SB#1 @ 8'
Project Location: VACUUM E-8

COPY

Sampling Date: 06/18/09
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: ML
Analyzed By: AB/HM

LAB NUMBER SAMPLE ID	GRO (C_6-C_{10}) (mg/kg)	DRO (>C_{10}-C_{28}) (mg/kg)	Cl* (mg/kg)
ANALYSIS DATE	06/20/09	06/20/09	06/19/09
H17673-1 SB #1 @ 8'	<10.0	<10.0	64
Quality Control	514	551	500
True Value QC	500	500	500
% Recovery	103	110	100
Relative Percent Difference	4.0	5.7	<0.1

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; Cl: Std. Methods 4500-Cl B
*Analysis performed on a 1:4 w:v aqueous extract. Reported on wet weight.

Chemist

06/23/09
Date

H17673 TCL RICE

CARDINAL LABORATORIES
101 East Marland, Hobbs, NM 88240
(575) 393-2326 Fax (575) 393-2476

Page ____ of ____

Company Name: Rice Operating	**BILL TO**
Project Manager: Darnell Mitchell	P.O. #:
Address: 122 W. Taylor	Company: SAME
City: Hobbs State: N.M Zip: 88240	Attn:
Phone #: -- Fax #: 575-397-1471	Address:
Project #: Project Owner:	City:
Project Name: SB#1 @ 8'	State: Zip:
Project Location: VACUUM JCT E-8	Phone #:
Sampler Name: Darnell Mitchell	Fax #:

ANALYSIS REQUEST

COPY

Lab I.D. (FOR LAB USE ONLY)	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX: GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	PRESERV.: ACID/BASE:	ICE / COOL	OTHER:	SAMPLING: DATE	TIME	Cl	8015M
H17673-1	SB#1 @ 8'	G				✓	1				✓		6-18-09	9:02	✓	✓

PLEASE NOTE: Liability and Damages: Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Terms and Conditions: Interest will be charged on all accounts more than 30 days past due at the rate of 24% per annum from the original date of invoice, and all costs of collections, including attorney's fees.

Sampler Relinquished: Darnell Mitchell	Date: Time:	Received By:	Phone Result: ☐ Yes ☐ No Add'l Phone #:
Relinquished By: Bruce Baker	Date: 6/19/09 Time: 1:23pm	Received By: [signature]	Fax Result: ☐ Yes ☐ No Add'l Fax #:
Delivered By: (Circle One) Sampler - UPS - Bus - Other	Temp.	Sample Condition: Cool ☑ Yes ☐ No; Intact ☑ Yes ☐ No	CHECKED BY: (Initials) MCB

REMARKS: Results B.Baker@RiceSWD.com
J Purvis@RiceSWD.com

† Cardinal cannot accept verbal changes. Please fax written changes to 575-393-2476.

RICE OPERATING COMPANY

122 West Tayor Hobbs, NM 88240
PHONE: (575) 393-9174 FAX: (575) 397-1471
PID METER CALIBRATION & FIELD REPORT FORM

Check Model Number:

✓	Model: PGM 7300	Serial No: 590-000183		Model: PGM 7600	Serial No: 110-023920
	Model: PGM 7300	Serial No: 590-000508		Model: PGM 7600	Serial No: 110-013744
	Model: PGM 7300	Serial No: 590-000504		Model: PGM 7600	Serial No: 110-013676

COPY

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 3604	EXPIRATION DATE: 10-9-10
FILL DATE: 4-9-09	METER READING ACCURACY: 100

ACCURACY: +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
Vacuum	E-8	E	8	18S	35E

SAMPLE ID	PID	SAMPLE ID	PID
4'	0.1	Background	0
5'	0.1	6"	
6'	0		
7'	0.1		
8'	0.1		

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

SIGNATURE: Jordan Woodfin

DATE: 6-18-09