

1R - 425-78

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, July 16, 2012 1:18 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 (1R425-78) Termination - ROC Vacuum Jct A-7 Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum Jct A-7 Site
Unit Letter A, Section 7, T18S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-78) 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 8, 2012 (received June 12, 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 (1R425-78) 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 OGD

2012 JUN 12 P 12:43

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 8, 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. A-7 (1R425-78): UL/A, Sec. 7, 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 A-7 junction box as part of the system abandonment. The site is located in UL/A, Sec. 7, T18S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 102 +/- feet. An investigation was conducted at the former junction box site 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 6-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 16 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The entire bore hole was plugged 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

A handwritten signature in black ink, appearing to read 'H. Conder', with a stylized, sweeping underline.

Hack Conder
Environmental Manager

enclosures

BOX LOCATION

DATE 11-13-09

Vacuum Jct. A-7

Unit A, Section 7, T18S, R35E



former junction box location

6/18/2009



drilling SB #1 at the former junction box location

6/18/2009



plugging SB #1 with bentonite

6/18/2009



seeding backfilled site

6/25/2009



ARDINAL LABORATORIES

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

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

Receiving Date: 06/19/09
Reporting Date: 06/22/09
Project Number: NOT GIVEN
Project Name: VACUUM JCT A-7
Project Location: VACUUM JCT A-7

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)	CI* (mg/kg)
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ANALYSIS DATE	06/20/09	06/20/09	06/19/09
H17670-1 SB #1 @ 6FT	<10.0	<10.0	16
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; CI: Std. Methods 4500-CI/B

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

Chemist


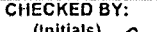
Date

H17670 TCL RICE

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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

<small>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 and/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.</small>							
Relinquished By: Bruce Baker		Date: 6/19/09 Time: 1:20 PM		Received By: 		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #: Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Fax #:	
Relinquished By:		Date: Time:		Received By:		REMARKS: Email Results to JPURVIS@RICCSWD.COM BBAKE@RICCSWD.COM	
Delivered By: (Circle One) Sampler - UPS - Bus - <u>Other</u>				Sample Condition Cool Intact <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> No		CHECKED BY: (Initials) 	

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

RICE OPERATING COMPANY

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

COPY

<input checked="" type="checkbox"/>	Model: PGM 7300	Serial No: 590-000183	<input type="checkbox"/>	Model: PGM 7600	Serial No: 110-023920
<input type="checkbox"/>	Model: PGM 7300	Serial No: 590-000508	<input type="checkbox"/>	Model: PGM 7600	Serial No: 110-013744
<input type="checkbox"/>	Model: PGM 7300	Serial No: 590-000504	<input type="checkbox"/>	Model: PGM 7600	Serial No: 110-013676

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 30001	EXPIRATION DATE: 10-9-10
FILL DATE: 4-9-09	METER READING ACCURACY: 100

ACCURACY: +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
Vacuum	A-7	A	7	185	35E

SAMPLE ID	PID	SAMPLE ID	PID
2'	0.1	Background	-
3'	0	6"	0
4'	0		
5'	0		
6'	0		

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

SIGNATURE: *Jordan Wood*

DATE: 6-18-09