

Hansen, Edward J., EMNRD

From:	Hansen, Edward J., EMNRD
Sent:	Tuesday, July 31, 2012 9:43 AM
То:	Hack Conder (hconder@riceswd.com)
Cc:	Leking, Geoffrey R, EMNRD; Laura Pena (lpena@riceswd.com); Scott Curtis
	(scurtis@riceswd.com)
Subject:	Remediation Plan (1R425-95) Termination - ROC Vacuum K-30 EOL Site

RE: Termination Request for the Rice Operating Company's Vacuum K-30 EOL Site Unit Letter K, Section 30, T17S, R35E, NMPM, Lea County, New Mexico Remediation Plan (1R425-95) 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 July 2, 2012 (received July 3, 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 (1R425-95) 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

3 2012 JUL

RICE Operating Company Oil Conservation Division 1220 S. St. Francis Drive 122 West Taylor • Hobbs, New Mexico 88240 Phone: (575) 393-9174 • Fax: (575) 397-1471

1220 S. St. Francis Drive Santa Fe, NM 87505

CERTIFIED MAIL RETURN RECEIPT NO. 7007 2560 0000 4569 8654

July 2, 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 K-30 EOL (1R425-95): UL/K, 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 2010, ROC initiated work on the former K-30 EOL junction box as part of the system abandonment. The site is located in UL/K, Sec. 30, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 88 +/feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 7x3x5-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 5-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 excavated soil was returned to the excavation to ground surface and contoured to the surrounding area. On 5/21/2010, 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

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Hack Conder Environmental Manager

enclosures

RICE OPERATING COMPANY JUNCTION BOX FINAL REPORT

					BOX LOC	ATION					
SWD SYS	TEM JU	INCTION	UNIT	SECTIO	N TOWNSHIP	RANGE	COUN	NTY BC	X DIMENSIO	NS - FEE	T
Vacuur	n K	-30 EOL	к	30	· 17S	35E	Lea	a Length	Eliminat	ed	Depth
LAND TYP	E: BLN	Λ	STATE X	FEE	LANDÓWNER		<u> </u>	ОТН	ER		
Depth to (Groundw	vater	88	feet	NMO	CD SITE A	SSESSN	ENT RANKIN	G SCORE:	1	0
Date Sta	arted	4/19/2	2010	Date (Completed	4/19/20	10	OCD Witness		no	
Soil Excav	ated	3.9	cubic ya	rds I	Excavation Le	ength	7	Width 3	Depth	5	feet
Soil Disp	osed	0	cubic ya	rds	Offsite Facility	r	n/a	Locat	ion	n/a	
FINAL ANAL	YTIC	AL RES	SULTS:	Sa	nple Date	4/19/2	010	Sample	Depth	5	ft
TPH and Chlo	ride labo testing	pratory te procedur	st results c es pursuar	ompleted it to NMO	bỷ using an aj CD guidelines	pproved lat	and	CHL	ORIDE FIE	LD TES	STS
Sample,		PID (fiel	[d) <u> </u>	RO J/kg	DRO/ mg/kg	Chlor .mg/l	ide ,	LOCATIO	N. DEF	TH	mg/kĝ
SOURCE 5 C	RAB	0.3		0.0	<10.0	64		backgroun	d 6		604
L		1	I		,				1		208
								vertical delinea	tion 2		56
General Descrip	tion of	Rémedia	il Action:	This june	ction box was ad	ddressed du	ring	trench at the	3		85
the Vacuum SWD	System a	abandonm	ent. After ti	ne former j	unction box was	s removed a	n	junction (sour	^{ce)} 4		89
investigation was c	onducted	l using a b	ackhoe to c	ollect soil s	sample at regula	ar intervals			5		84
creating a 7x3x5-ft	deep exc	cavation. I	Each sampl	e was field	tested for chlor	ides and				•	
organic vapors whi	ch yielde	d low conc	centrations.	The deep	est sample, 5 ft.	BGS, was					
sent to a commerc	al labora	itory for an	alysis of ch	oride and	TPH which conf	irmed low co	oncentratio	ns. The excavat	ed soil was re	eturned I	o .
the excavation to g	round su	rface and	contoured to	the surro	unding area. O	n 5/21/2010	, the site w	as seeded with a	a blend of nat	ive	
vegetation and is e	xpected	to return to	o a productiv	e capacity	at a normal rat	e.					
						enclosur	es: photos	, lab results, PID	(field) scree	nings, ch	loride curve
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REPORT ASSEMBLED BY	·	Katie Jones	<u> </u>	INITIAL_	K)			COMPA	NY RICE OF	ERATING	COMPANY
PROJECT LEADER	Larry	Bruce Bak	er Jr. SIG	NATURE	Lany-	Bruce 1	Bakes 1	<u>li.</u> DA	ιτε 9 -	<u>28</u> -	10:

Vacuum K-30 EOL



Site prior to delineation

4/19/2010



Backfilling excavation

4/20/2010

Unit K, Section 30, T17S, R35E



Collecting sample

4/19/2010



Seeding excavation

5/21/2010



PHONE (575) 393-2326 . 101 E. MARLAND . HOBBS, NM 38244,

ANALYTICAL RESULTS FOR RICE OPERATING COMPANY ATTN, BRUCE BAKER 112 W. TAYLOR HOBBS, NM 88240

Receiving Date: 04/20/10 Reporting Date: 04/22/10 Project Number: NOT GIVEN Project Name: VAC. S.W.D. K-30 EOL (17S/35E) Project Location. VAC. S.W.D.K-30 EOL (17S/35E) Sampling Date: 04/19/10 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: JH Analyzed By: AB/SJ

GRO DRO (C₆-C₁₀) (>C₁₀-C₂₈) CI⁺ (mg/kg) (mg/kg) (mg/kg)

LAB NUMBER SAMPLE ID

ANALYSIS DAT	E		04/22/10	04/22/10	04/20/10
H19705-1 S	OURCE GRAB @	5,	<10.0	<10.0	64
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·		and a second			
	·				-
Quality Control			524	533	500
True Value QG			500	500	500
% Recovery			105	107	100
Relative Percent	Difference		2.5	0.6	< 0.1

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

H19705 TCL RICE

ELASE NOTE Liability and Demages. Cardinal's liability and Clent's diclusive listingly for sint campating, whether, bessed in Contrast on text, shallon lambed to the amount pairingly clean to analysis. All claims, including these to negligible and any other chies whether whether index index in an index of the amount pairing the applicable. Statis in not struct shall cardinal be label for index and the degree whether index index in and for any other claims index of the applicable, the applicable, whether bessed by Cardinal within thirty (20) days after complete the applicable, statis of the applicable of the applicabl

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

RDINAL LABORATORIES

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Phone #: 3	5 -9 H		Address			
Project#:	Project Owitte		City:			
Project Name:	VALL SLUTTOL K-30 FOL	(175/35E)	State: Zip:			
Project Location			Phone #:			
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101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abliene, TX 79603

Relinaulshed By:	j Date:	Received By:	Phone Result: 0 Yes 10 No: Add'I Phone #:	
3 dense	Time:		REMARKS:	
Relinquished By:	2792010	Received By:	flense emulti (esults to	
	Tuno: 57	Jour Denson		
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† Cardinal cannot accept verbal o	changes. Please	e fax written changes to 505-393-2476	KIEGE CHESWILLON	
		.1.		

Itn/

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:

Х	Model: PGM 7300	Serial No: 590-000183	 Model: PGM 7600
	Model: PGM 7300	Serial No: 590-000508	Model: PGM 7600
	Model: PGM 7300	Serial No: 590-000504	 Model: PGM 7600

Serial No: 110-023920 Serial No: 110-013744 Serial No: 110-013676

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO : 927041	EXPIRATION DATE: 11-16-2012
FILL DATE: 11-13-09	METER READING ACCURACY: 100 ppm

ACCURACY : +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
Vacuum	K-30 EOL	К	30	17\$	35E

SAMPLE ID	PID	SAMPLE ID	PID
Background	1.1	Source @ 1'	0.7
		2'	0.7
		3'	0.7
	_	4'	0.4
		5'	0.3
· · · · ·			
COP	Y		
· · · · · · · · · · · · · · · · · · ·			

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

SIGNATUE:

DATE: 4-19-10