

1R - 425-99

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, August 13, 2012 1:44 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 (1R425-99) Termination - ROC Vacuum I-3 EOL Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum I-3 EOL Site
Unit Letter I, Section 3, T18S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-99) 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 5, 2012 (received July 9, 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 conditionally approves the report and hereby notifies you that the remediation plan (1R425-99) is terminated in accordance with 19.15.29 NMAC:

ROC must submit to the OCD an annual status report regarding the ground water recovery system at the site.

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 OCD

2012 JUL -9 P 12: 52

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 8661

July 5, 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 I-3 EOL (1R425-99): UL/I, Sec. 3, 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 2010, ROC initiated work on the former I-3 EOL junction box as part of the system abandonment. The site is located in UL/I, Sec. 3, T18S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 50 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x3x9-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 9-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 and contoured to the surrounding area. On 3/3/2011, 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	I-3 EOL	I	3	18S	35E	Lea	Length	Width	Depth
							Eliminated		

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

Depth to Groundwater 56 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 3/23/2010 Date Completed 3/23/2010 OCD Witness no

Soil Excavated 5.0 cubic yards Excavation Length 5 Width 3 Depth 9 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 3/23/2010 Sample Depth 9 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 9' GRAB	0.4	<10.0	<10.0	32

LOCATION	DEPTH	mg/kg
background	6"	152
vertical delineation at former junction (source)	3'	148
	4'	150
	5'	145
	6'	178
	7'	171
	8'	264
	9'	149

General Description of Remedial Action: This junction box was addressed during the Vacuum SWD System abandonment. After the former junction box was removed an investigation was conducted using a backhoe to collect soil sample at regular intervals creating a 5x3x9-ft deep excavation. Each sample was field tested for chlorides and organic vapors which yielded low concentrations similar to that of the background sample. The deepest sample, 9 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 to ground surface and contoured to the surrounding area. On 3/03/2011, the site was seeded with a blend of native 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) screenings, chloride curve

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

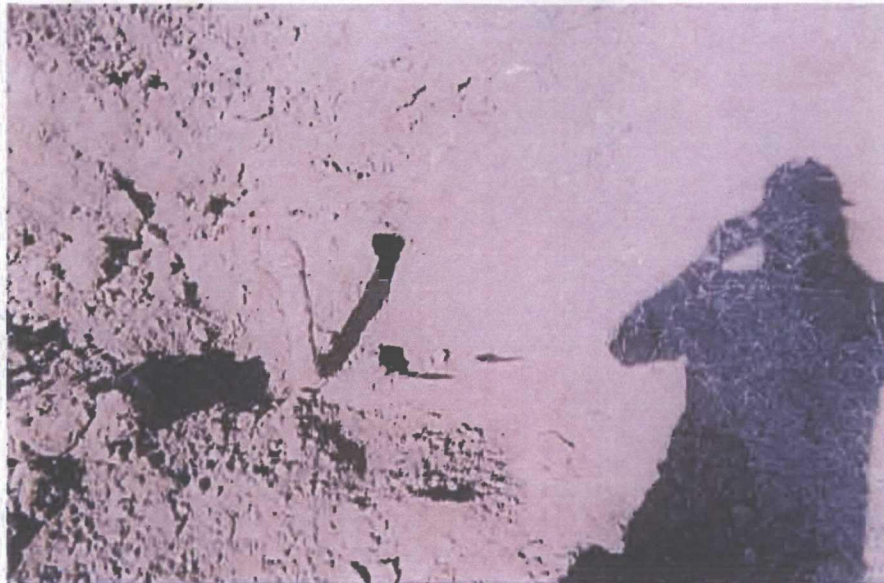
SITE SUPERVISOR Jordan Woodfin SIGNATURE *Jordan Woodfin* COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Larry Bruce Baker Jr. INITIAL LBB

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE *Larry Bruce Baker Jr.* DATE 3-23-11

Vacuum Jct. I-3 EOL

Unit I, Section 3, T18S, R35E



Site prior to delineation

3/23/2010



Collecting sample

3/23/2010



Backfilling excavation

3/23/2010



Seeding excavation

3/03/2011



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

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

COPY

Receiving Date: 03/23/10
Reporting Date: 03/26/10
Project Number: NOT GIVEN
Project Name: VACUUM I-3 EOL (18/35)
Project Location: VACUUM I-3 EOL (18/35)

Sampling Date: 03/23/10
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: JH
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	03/25/10	03/25/10	03/24/10
H19532-1 SOURCE BTM GRAB @ 9FT	<10.0	<10.0	32
Quality Control	493	497	500
True Value QC	500	500	500
% Recovery	98.6	99.4	100
Relative Percent Difference	0.6	13.6	< 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.

Cheryl Keene
Chemist

03/30/10
Date

H19532 TCL RICE

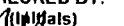
PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (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. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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.

Relinquished By:		Date:	Received By:	Phone Result:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
Jordan Woodfin		3-23-10		Fax Result:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
		Time:		REMARKS:		
Relinquished By:		Date:	Received By:	email results		
		3/23/10	Jodi Benson	jwoodfin@riceswd.com; jpurvis@riceswd.com		
		Time:		bbaker@riceswd.com		
Delivered By: (Circle One)		Sample Condition:		CHECKED BY:		
<input checked="" type="checkbox"/> Carrier - UPS - Bus - Other:		Cool Intact <input type="checkbox"/> Yes <input type="checkbox"/> No		(Initials) 		

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

NEED SAMPLES BACK, PLEASE

RICE OPERATING COMPANY

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

COPY

Check Model Number

✓

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

Model: PGM 7600 Serial No: 110-023920
 Model: PGM 7600 Serial No: 110-013744
 Model: PGM 7600 Serial No: 110-013676

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 924503	EXPIRATION DATE: 7-5-12
FILL DATE: 7-1-09	METER READING ACCURACY: 100.9

ACCURACY: +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
Vacuum	I-3 EOL	I	3	185	35E

SAMPLE ID	PID	SAMPLE ID	PID
Source		Background	
2'	3.5	6"	0.0
3'	7.7		
4'	3.5		
5'	3.6		
6'	1.9		
7'	1.5		
8'	0.8		
9'	0.4		

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

SIGNATURE

John Wolff

DATE: 3-23-10