1R - 425-15

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, April 11, 2012 1:37 PM
To: Hack Conder
Cc: Leking, Geoffrey R, EMNRD; 'Katie Jones'; Laura Pena; 'Scott Curtis'
Subject: Remediation Plan (1R425-15) Termination - ROC Vacuum Jct C-36 Site

RE: Termination Request
for the Rice Operating Company's
Vacuum Jct C-36 Site
Unit Letter C, Section 36, T17S, R34E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-15) 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 March 27, 2012 (received April 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 approves the report and hereby notifies you that the remediation plan (1R425-15) 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

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

March 26, 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. C-36 (1R425-15): UL/C, Sec. 36, T17S, R34E
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 2005, ROC initiated work on the former C-36 junction box as part of the system abandonment. The site is located in UL/C, Sec. 36, T17S, R34E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 105 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 8x3x9-ft deep excavation. Each sample was field titrated for chlorides and field screen using a PID for hydrocarbons, resulting in relatively 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 324 mg/kg, a concentration of gasoline range organics (GRO) of 22.9 mg/kg, and a diesel range organics (DRO) concentration of 683 mg/kg. Lab analysis showed that TPH concentrations were within NMOCD guidelines. The excavated soil was blended on site, returned to the excavation, and contoured to the surrounding area. Clean soil was imported and used as a top cap to level the surface. On 12/19/2005, 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. C-36	C	36	17S	34E	Lea	System Abandonment--no box		

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

Depth to Groundwater 105 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 9/16/2005 Date Completed 12/19/2005 NMOCD Witness no

Soil Excavated 8 cubic yards Excavation Length 8 Width 3 Depth 9 feet

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

FINAL ANALYTICAL RESULTS: **Sample Date** 9/16/2005 **Sample Depth** 9 ft

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

Sample Location	PID ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
GRAB @ 9 ft BGS	0.1	22.9	683	324

CHLORIDE FIELD TESTS

LOCATION	DEPTH (ft)	ppm
vertical trench at junction	4	245
	5	447
	6	467
	7	333
	8	387
	9	270

General Description of Remedial Action:

This junction was addressed as part of the Vacuum SWD System Abandonment. After removing the box materials, a delineation trench was made at the junction while soil samples were collected at regular intervals to 9 ft BGS. Chloride field tests performed on the samples yielded low concentrations. PID screenings were also low and were less than 100 ppm from 5 to 9 ft BGS. A grab sample at 9 ft BGS was analyzed at a laboratory for confirmation of field tests. NMOCD TPH guidelines were met. There were no physical indications of adverse impact from this junction box. The excavated soil was blended on site and then backfilled into the trench and contoured to the surrounding terrain. Clean additional fill dirt was imported to level the surface. The disturbed surface was seeded with a blend of native vegetation and is expected to return to productive capacity at a normal rate. Since the SWD System is no longer in service, a new junction box is not required.

enclosures: photos, lab results, PID field screenings

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

SITE SUPERVISOR Roy Rascon SIGNATURE Roy A. Rascon COMPANY RICE Operating Company

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE Kristin Farris Pope

DATE 2/9/2006 TITLE Project Scientist

Vacuum jct. C-36

Unit 'C', Sec. 36, T17S, R34E

undisturbed junction box 6/13/2005

delineation & excavation 9/16/2005

seeding disturbed surface 12/19/2005

ENVIRONMENTAL LAB OF

12600 West I-20 East - Odessa, Texas 79765

Analytical Report

Prepared for:

Roy Rascon

Rice Operating Co.

122 W. Taylor

Hobbs, NM 88240

Project: Vacuum Jct. C-36 RRR

Project Number: None Given

Location: None Given

Lab Order Number: 5I19019

Report Date: 09/23/05

Rice Operating Co.	Project: Vacuum Jct. C-36 RRR	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	Reported:
Hobbs NM, 88240	Project Manager: Roy Rascon	09/23/05 11:15

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Vert.@ 9'	5I19019-01	Soil	09/16/05 13:22	09/16/05 18:00

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Rice Operating Co.	Project: Vacuum Jct. C-36 RRR	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	Reported:
Hobbs NM, 88240	Project Manager: Roy Rascon	09/23/05 11:15

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Vert.@ 9' (5I19019-01) Soil									
Gasoline Range Organics C6-C12	22.9	10.0	mg/kg dry	1	EI52010	09/20/05	09/21/05	EPA 8015M	
Diesel Range Organics >C12-C35	683	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	706	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*79.0 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*98.8 %*	*70-130*		"	"	"	"	

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Rice Operating Co.	Project: Vacuum Jct. C-36 RRR	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	Reported:
Hobbs NM, 88240	Project Manager: Roy Rascon	09/23/05 11:15

General Chemistry Parameters by EPA / Standard Methods
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Vert.@ 9' (5119019-01) Soil									
Chloride	**324**	10.0	mg/kg	20	EI52104	09/20/05	09/21/05	EPA 300.0	
% Moisture	**6.3**	0.1	%	1	EI52005	09/20/05	09/20/05	% calculation	

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Rice Operating Co.	Project: Vacuum Jct. C-36 RRR	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	Reported:
Hobbs NM, 88240	Project Manager: Roy Rascon	09/23/05 11:15

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EI52010 - Solvent Extraction (GC)										
Blank (EI52010-BLK1)				Prepared: 09/20/05 Analyzed: 09/21/05						
Gasoline Range Organics C6-C12	ND	10.0	mg/kg wet							
Diesel Range Organics >C12-C35	ND	10.0	"							
Total Hydrocarbon C6-C35	ND	10.0	"							
Surrogate: 1-Chlorooctane	*42.6*		*mg/kg*	*50.0*		*85.2*	*70-130*			
Surrogate: 1-Chlorooctadecane	*42.1*		*"*	*50.0*		*84.2*	*70-130*			
LCS (EI52010-BS1)				Prepared: 09/20/05 Analyzed: 09/21/05						
Gasoline Range Organics C6-C12	412	10.0	mg/kg wet	500		82.4	75-125			
Diesel Range Organics >C12-C35	531	10.0	"	500		106	75-125			
Total Hydrocarbon C6-C35	943	10.0	"	1000		94.3	75-125			
Surrogate: 1-Chlorooctane	*42.2*		*mg/kg*	*50.0*		*84.4*	*70-130*			
Surrogate: 1-Chlorooctadecane	*45.4*		*"*	*50.0*		*90.8*	*70-130*			
Calibration Check (EI52010-CCV1)				Prepared: 09/20/05 Analyzed: 09/21/05						
Gasoline Range Organics C6-C12	419		mg/kg	500		83.8	80-120			
Diesel Range Organics >C12-C35	551		"	500		110	80-120			
Total Hydrocarbon C6-C35	970		"	1000		97.0	80-120			
Surrogate: 1-Chlorooctane	*47.7*		*"*	*50.0*		*95.4*	*0-200*			
Surrogate: 1-Chlorooctadecane	*52.0*		*"*	*50.0*		*104*	*0-200*			
Matrix Spike (EI52010-MS1)	**Source: 5I19030-02**			Prepared: 09/20/05 Analyzed: 09/21/05						
Gasoline Range Organics C6-C12	545	10.0	mg/kg dry	692	ND	78.8	75-125			
Diesel Range Organics >C12-C35	730	10.0	"	692	ND	105	75-125			
Total Hydrocarbon C6-C35	1280	10.0	"	1380	ND	92.8	75-125			
Surrogate: 1-Chlorooctane	*45.5*		*mg/kg*	*50.0*		*91.0*	*70-130*			
Surrogate: 1-Chlorooctadecane	*49.3*		*"*	*50.0*		*98.6*	*70-130*			
Matrix Spike Dup (EI52010-MSD1)	**Source: 5I19030-02**			Prepared: 09/20/05 Analyzed: 09/21/05						
Gasoline Range Organics C6-C12	536	10.0	mg/kg dry	692	ND	77.5	75-125	1.67	20	
Diesel Range Organics >C12-C35	715	10.0	"	692	ND	103	75-125	2.08	20	
Total Hydrocarbon C6-C35	1250	10.0	"	1380	ND	90.6	75-125	2.37	20	
Surrogate: 1-Chlorooctane	*45.7*		*mg/kg*	*50.0*		*91.4*	*70-130*			
Surrogate: 1-Chlorooctadecane	*46.1*		*"*	*50.0*		*92.2*	*70-130*			

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General Chemistry Parameters by EPA / Standard Methods - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EI52005 - General Preparation (Prep)										
Blank (EI52005-BLK1)				Prepared & Analyzed: 09/20/05						
% Solids	100		%							
Duplicate (EI52005-DUP1)		Source: 5I16016-50		Prepared & Analyzed: 09/20/05						
% Solids	88.1		%		88.8			0.791	20	
Duplicate (EI52005-DUP2)		Source: 5I19010-02		Prepared & Analyzed: 09/20/05						
% Solids	99.0		%		98.8			0.202	20	
Duplicate (EI52005-DUP3)		Source: 5I19020-01		Prepared & Analyzed: 09/20/05						
% Solids	86.5		%		87.7			1.38	20	
Batch EI52104 - Water Extraction										
Blank (EI52104-BLK1)				Prepared: 09/20/05 Analyzed: 09/21/05						
Chloride	ND	0.500	mg/kg							
LCS (EI52104-BS1)				Prepared: 09/20/05 Analyzed: 09/21/05						
Chloride	8.55		mg/L	10.0		85.5	80-120			
Calibration Check (EI52104-CCV1)				Prepared: 09/20/05 Analyzed: 09/21/05						
Chloride	8.64		mg/L	10.0		86.4	80-120			
Duplicate (EI52104-DUP1)		Source: 5I19002-12		Prepared: 09/20/05 Analyzed: 09/21/05						
Chloride	3210	50.0	mg/kg		3230			0.621	20	

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Notes and Definitions

DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
RPD	Relative Percent Difference
LCS	Laboratory Control Spike
MS	Matrix Spike
Dup	Duplicate

Report Approved By: Raland K. Tuttle Date: 9-23-05

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer
Jeanne Mc Murrey, Inorg. Tech Director
LaTasha Cornish, Chemist
Sandra Sanchez, Lab Tech.

Environmental Lab of Texas, Inc.

12600 West I-20 East
Odessa, Texas 79763
Phone: 915-563-1800
Fax: 915-563-1713

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

C-36

Project Manager: Ray Rascon
Company Name: RICE Operating
Company Address: 122 W. Taylor
City/State/Zip: Hobbs, NM 88240
Telephone No: (505) 393-9174
Fax No: (505) 397-1471
Sampler Signature: Ray R Rascon

Project Name: VAC JCT ~~AMS~~ RRR
Project #:
Project Loc:
PO #:

LAB # (lab use only)	FIELD CODE	Date Sampled	Time Sampled	No. of Containers	Preservative: Ice	Preservative: HNO_3	Preservative: HCl	Preservative: NaOH	Preservative: H_2SO_4	Preservative: None	Preservative: Other (Specify)	Matrix: Water	Matrix: Sludge	Matrix: Soil	Matrix: Other (specify)	Analyze For: TCLP: TDS/Cl/SAR/EC	TCLP: TPH 418.1	TCLP: TPH TX 1005/1006	TCLP: TPH 8015M GRO/DRO	TOTAL: Metals: As Ag Ba Cd Cr Pb Hg Se	TOTAL: Volatiles	TOTAL: Semivolatiles	TOTAL: BTEX 8021B/5030								RUSH TAT (Pre-Schedule)
	Vert. @ 9'	9-16-05	1:22P	1	✓									✓		✓			✓												

Special Instructions:

Sample Containers Intact? Y N
Temperature Upon Receipt:
Laboratory Comments:
Rec 1.5C

Relinquished by:	Date	Time	Received by:	Date	Time
Ray R Rascon	9-16-05	2:38P		9/15	15:30
Relinquished by:	Date	Time	Received by ELOT:	Date	Time
	9/15	15:30		9/16/05	1600

Environmental Lab of Texas
Variance / Corrective Action Report – Sample Log-In

Client: Rice Op.

Date/Time: 9/16/05 18:00

Order #: 5I19079

Initials: CK

Sample Receipt Checklist

Temperature of container/cooler?	Yes	No	1.5 C
Shipping container/cooler in good condition?	Yes	No	
Custody Seals intact on shipping container/cooler?	Yes	No	Not present
Custody Seals intact on sample bottles?	Yes	No	Not present
Chain of custody present?	Yes	No	
Sample Instructions complete on Chain of Custody?	Yes	No	
Chain of Custody signed when relinquished and received?	Yes	No	
Chain of custody agrees with sample label(s)	Yes	No	
Container labels legible and intact?	Yes	No	
Sample Matrix and properties same as on chain of custody?	Yes	No	
Samples in proper container/bottle?	Yes	No	
Samples properly preserved?	Yes	No	
Sample bottles intact?	Yes	No	
Preservations documented on Chain of Custody?	Yes	No	
Containers documented on Chain of Custody?	Yes	No	
Sufficient sample amount for indicated test?	Yes	No	
All samples received within sufficient hold time?	Yes	No	
VOC samples have zero headspace?	Yes	No	Not Applicable

Other observations:

Variance Documentation:

Contact Person: - Date/Time: Contacted by:

Regarding:

Corrective Action Taken:

RICE OPERATING COMPANY

122 WEST TAYLOR
HOBBS, NEW MEXICO 88240
PHONE: (505) 393-9174 FAX: (505) 397-1471

VOC FIELD TEST REPORT FORM

MINI RAE PLUS CLASSIC PHOTOIONIZATION GAS DETECTOR

MODEL NO: PGM 761S
SERIAL NO: 104412
CALIBRATION GAS
GAS COMPOSITION: ISOBUTYLENE 100 PPM
AIR BALANCE
LOT NO: 04-2474
FILL DATE: 2-1-05
EXP. DATE: 8-1-06
ACCURACY: +/- 2%
METER READING
ACCURACY: 100.0

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
VAC	AC-36	C	36	17S	34E

VERTICAL @ SOURCE

SAMPLE	PID RESULT	SAMPLE	PID RESULT
4'	427		
5'	0.1		
6'	0.1		
7'	7.6		
8'	0.1		
9'	0.1		

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

Ray R. Ratcom
Signature

9-16-05
Date