1R - 425-02

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, April 23, 2012 12:47 PM
To: 'Hack Conder'
Cc: Leking, Geoffrey R, EMNRD; 'Katie Jones'; 'Laura Pena'; 'Scott Curtis'
Subject: Remediation Plan (1R425-02) Termination- ROC Vacuum BO EOL Site

RE: Termination Request
for the Rice Operating Company's
Vacuum BO EOL Site
Unit Letter G, Section 12, T18S, R34E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-02) 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 April 13, 2012 (received April 20, 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 (1R425-02) 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

April 13, 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 BO EOL (1R425-02): UL/G, Sec. 12, T18S, 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 2004, ROC initiated work on the former BO EOL junction box as part of the system abandonment. The site is located in UL/G, Sec. 12, T18S, R34E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 115 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 9x3x12-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 12-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 170 mg/kg, a concentration of gasoline range organics (GRO) below detectable limits, and a diesel range organics (DRO) concentration of 17.3 mg/kg. The excavated soil was returned to the excavation to ground surface and contoured to the surrounding area. 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	B.O. EOL	G	12	18S	34E	Lea	no box--eliminated		

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

Depth to Groundwater 115 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 10/12/2004 Date Completed 11/10/2004 NMOCD Witness no

Soil Excavated 12 cubic yards Excavation Length 9 Width 3 Depth 12 feet

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

FINAL ANALYTICAL RESULTS: **Sample Date** 10/13/2004 **Sample Depth** 12 ft

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

Sample Location	PID ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
GRAB @ 12 ft BGS	0.0	<10.0	17.3	170

CHLORIDE FIELD TESTS

LOCATION	DEPTH (ft)	ppm
vertical at junction box	4	419
	5	389
	6	389
	7	419
	8	329
	9	329
	10	299
	11	269
	12	299

General Description of Remedial Action: This junction was eliminated and the Vacuum SWD system is to be abandoned in 2005. The box lumber was removed and a delineation trench was made with a backhoe directly under the junction site. Chloride field tests and PID screenings were performed on samples collected every vertical foot at 4-12 ft BGS. Chloride field test concentrations were low and exhibited a general trend of decline with depth, indicative of non-saturated historical vadose conditions. PID levels were also low and concentrations were 0.0 ppm at every foot at 6-12 ft BGS. Soil observed in the delineation trench was a light tan sand and did not exhibit any signs of contamination. The trench was backfilled with the excavated soil and contoured to the surrounding surface. The disturbed surface is expected to return to productive capacity at a normal rate.

enclosures: chloride graph, 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 Rob Elam SIGNATURE not available COMPANY Curt's Environmental--Odessa, TX

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE Kristin Farris Pope

DATE 3/8/2005 TITLE Project Scientist

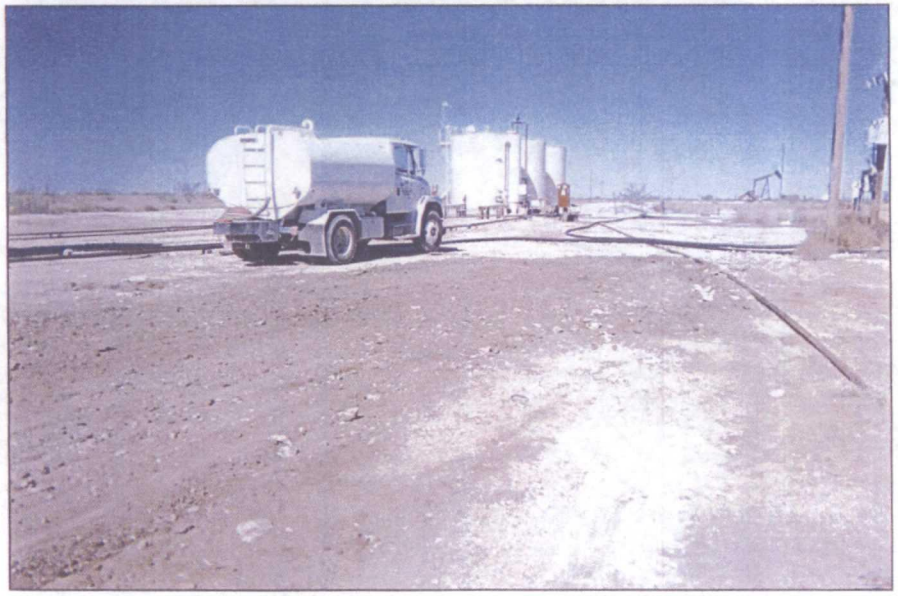
Vacuum B.O. EOL

Unit 'G', Sec. 12, T18S, R34E

undisturbed junction box 4/23/2002

junction box removed; old plumbing 4/25/2002

backfilling delineation trench 11/10/2004



backfilled trench 11/10/2004

ENVIRONMENTAL LAB OF

12600 West I-20 East - Odessa, Texas 79765

COPY

Analytical Report

Prepared for:

Roy Rascon

Rice Operating Co.

122 W. Taylor

Hobbs, NM 88240

Project: Exxon B.O. EOL

Project Number: None Given

Location: Vacuum

Lab Order Number: 4J15007

Report Date: 10/19/04

Rice Operating Co.	Project: Exxon B.O. EOL	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	10/19/04 10:45

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
12' Bottom (Grab)	4J15007-01	Soil	10/13/04 08:30	10/14/04 18:45

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Rice Operating Co.	Project: Exxon B.O: EOL	Fax: (505) 397-1471
122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	10/19/04 10:45

Organics by GC

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
12' Bottom (Grab) (4J15007-01) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EJ41501	10/15/04	10/16/04	EPA 8015M	
Diesel Range Organics >C12-C35	**17.3**	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	**17.3**	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*95.0 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*108 %*	*70-130*		"	"	"	"	

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122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	10/19/04 10:45

General Chemistry Parameters by EPA / Standard Methods

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
12' Bottom (Grab) (4J15007-01) Soil									
Chloride	**170**	20.0	mg/kg Wet	2	EJ41819	10/15/04	10/18/04	SW 846 9253	
% Moisture	**11.0**		%	1	EJ41811	10/15/04	10/18/04	% calculation	

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122 W. Taylor	Project Number: None Given	**Reported:**
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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 EJ41501 - Solvent Extraction (GC)										
Blank (EJ41501-BLK1)				Prepared: 10/15/04 Analyzed: 10/16/04						
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	*35.9*		*mg/kg*	*50.0*		*71.8*	*70-130*			
Surrogate: 1-Chlorooctadecane	*39.0*		"	*50.0*		*78.0*	*70-130*			
LCS (EJ41501-BS1)				Prepared: 10/15/04 Analyzed: 10/16/04						
Gasoline Range Organics C6-C12	444	10.0	mg/kg wet	500		88.8	75-125			
Diesel Range Organics >C12-C35	460	10.0	"	500		92.0	75-125			
Total Hydrocarbon C6-C35	904	10.0	"	1000		90.4	75-125			
Surrogate: 1-Chlorooctane	*45.6*		*mg/kg*	*50.0*		*91.2*	*70-130*			
Surrogate: 1-Chlorooctadecane	*40.5*		"	*50.0*		*81.0*	*70-130*			
Calibration Check (EJ41501-CCV1)				Prepared: 10/15/04 Analyzed: 10/16/04						
Gasoline Range Organics C6-C12	442		mg/kg	500		88.4	80-120			
Diesel Range Organics >C12-C35	483		"	500		96.6	80-120			
Total Hydrocarbon C6-C35	925		"	1000		92.5	80-120			
Surrogate: 1-Chlorooctane	*50.3*		"	*50.0*		*101*	*70-130*			
Surrogate: 1-Chlorooctadecane	*56.5*		"	*50.0*		*113*	*70-130*			
Matrix Spike (EJ41501-MS1)	**Source: 4J14026-05**			Prepared: 10/15/04 Analyzed: 10/16/04						
Gasoline Range Organics C6-C12	573	10.0	mg/kg dry	549	ND	104	75-125			
Diesel Range Organics >C12-C35	633	10.0	"	549	ND	115	75-125			
Total Hydrocarbon C6-C35	1210	10.0	"	1100	ND	110	75-125			
Surrogate: 1-Chlorooctane	*55.4*		*mg/kg*	*50.0*		*111*	*70-130*			
Surrogate: 1-Chlorooctadecane	*58.1*		"	*50.0*		*116*	*70-130*			
Matrix Spike Dup (EJ41501-MSD1)	**Source: 4J14026-05**			Prepared: 10/15/04 Analyzed: 10/16/04						
Gasoline Range Organics C6-C12	591	10.0	mg/kg dry	549	ND	108	75-125	3.09	20	
Diesel Range Organics >C12-C35	623	10.0	"	549	ND	113	75-125	1.59	20	
Total Hydrocarbon C6-C35	1210	10.0	"	1100	ND	110	75-125	0.00	20	
Surrogate: 1-Chlorooctane	*59.3*		*mg/kg*	*50.0*		*119*	*70-130*			
Surrogate: 1-Chlorooctadecane	*60.1*		"	*50.0*		*120*	*70-130*			

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122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	10/19/04 10:45

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 EJ41811 - % Solids										
Blank (EJ41811-BLK1)				Prepared: 10/15/04 Analyzed: 10/18/04						
% Moisture	0.0		%							
Duplicate (EJ41811-DUP1)		Source: 4J14025-01		Prepared: 10/15/04 Analyzed: 10/18/04						
% Moisture	9.0		%		9.0			0.00	20	
Batch EJ41819 - Water Extraction										
Blank (EJ41819-BLK1)				Prepared & Analyzed: 10/18/04						
Chloride	ND	20.0	mg/kg Wet							
Matrix Spike (EJ41819-MS1)		Source: 4J14026-07		Prepared: 10/14/04 Analyzed: 10/18/04						
Chloride	478	20.0	mg/kg Wet	500	0.00	95.6	80-120			
Matrix Spike Dup (EJ41819-MSD1)		Source: 4J14026-07		Prepared: 10/14/04 Analyzed: 10/18/04						
Chloride	478	20.0	mg/kg Wet	500	0.00	95.6	80-120	0.00	20	
Reference (EJ41819-SRM1)				Prepared & Analyzed: 10/18/04						
Chloride	5000		mg/kg	5000		100	80-120			

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122 W. Taylor	Project Number: None Given	**Reported:**
Hobbs NM, 88240	Project Manager: Roy Rascon	10/19/04 10:45

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: 10/19/04

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer
Jeanne Mc Murrey, Inorg. Tech Director
James L. Hawkins, Chemist/Geologist
Sandra Biezugbe, Lab Tech.

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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
CALIBRATION GAS
GAS COMPOSITION: ISOBUTYLENE
AIR
LOT NO: 03-2475
EXP. DATE: 10-19-04
METER READING
ACCURACY: 100.°

SERIAL NO: ~~104412~~ 104550
100 PPM
BALANCE
FILL DATE: 4-19-04
ACCURACY: ± 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
VAC	B.O. Exxon EOL	G	12	18	34

SAMPLE	PID RESULT	SAMPLE	PID RESULT
Source 4'	3.3		
5'	1.4		
6'	0		
7'	0		
8'	0		
9'	0		
10'	0		
11'	0		
12	0		

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

Rob Elam
Signature

Title

10-12-04
Date