

1R - 425-41

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, May 15, 2012 5:13 PM
To: Hack Conder (hconder@riceswd.com)
Cc: Leking, Geoffrey R, EMNRD; Katie Jones <kjones@riceswd.com> (kjones@riceswd.com); Laura Pena (lpena@riceswd.com); Scott Curtis (scurtis@riceswd.com)
Subject: Remediation Plan (1R425-41) Termination - ROC Vacuum OXY Permian 'N' EOL Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum OXY Permian 'N' EOL Site
Unit Letter B, Section 28, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-41) 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 May 4, 2012 (received May 14, 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 (1R425-41) 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

May 4, 2012

RECEIVED

Mr. Edward Hansen
New Mexico Energy, Minerals, & Natural Resources
Oil Conservation Division, Environmental Bureau
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

MAY 14 2012

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

RE: Termination Request
Vacuum Oxy Permian 'N' EOL (1R425-41): UL/B, Sec. 28, 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 2007, ROC initiated work on the former Oxy Permian 'N' EOL junction box as part of the system abandonment. The site is located in UL/B, Sec. 28, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 70 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 9x3x6-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 6-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 288 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. Clean, imported soil was used as a top cap and to contour the site 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

A handwritten signature in black ink, appearing to read "H. Conder", with a long horizontal flourish extending to the right.

Hack Conder
Environmental Manager

enclosures

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	NEW BOX DIMENSIONS - FEET		
Vacuum	Oxy Permian "N" EOL	B	28	17S	38E	Lea	Length	Width	Depth
							no. box; System abandonment		

LAND TYPE: BLM STATE X FEE LANDOWNER OTHER

Depth to Groundwater 70 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 8/23/2007 Date Completed 8/31/2007 NMOCD Witness no

Soil Excavated 6 cubic yards Excavation Length 9 Width 3 Depth 6 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 8/23/2007 Sample Depth 6 ft

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

CHLORIDE FIELD TESTS

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
backhoe grab 6 ft below junction	8.4	<10.0	<10.0	288

LOCATION	DEPTH (ft)	ppm
delineation	3	255
trench at	4	264
former	5	320
junction site	6	261

General Description of Remedial Action:

This junction box located within a production facility site was addressed as part of the Vacuum SWD System abandonment. After the box was removed and the site was cleared of NORM contamination, a delineation trench was made at the former junction site using a backhoe to collect samples to 6 ft BGS. Chloride field tests performed on the samples yielded very low concentrations. Organic vapors were measured using a PID and also yielded very low concentrations in each sample. The deepest (6 ft) sample was sent to a certified laboratory for confirmation. TPH levels were not present within the laboratory's detection limits, meeting NMOCD guidelines. The trench was backfilled and the remaining hole from the box was filled with clean, imported soil and contoured to the surrounding terrain.

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 Rascon COMPANY: RICE Operating Company

REPORT ASSEMBLED BY: Kristin Farris Pope SIGNATURE Kristin Farris Pope
DATE: 10/23/2007 TITLE: Project Scientist



Stake at former box location

8/7/2007

Vacuum Oxy Permian 'N' EOL

Unit B, Section 28, T17S, R35E



delineation trench 6 ft deep

8/24/2007



site backfilled with 12 yds³ imported fill

8/31/2007



ARDINAL LABORATORIES

PHONE (325) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
RICE OPERATING CO.
ATTN: ROY R. RASCON
122 W. TAYLOR
HOBBS, NM 88240
FAX TO: (505) 397-1471

COPY

Receiving Date: 08/24/07
Reporting Date: 08/29/07
Project Number: NOT GIVEN
Project Name: VAC OXY PERMIAN "N" EOL
Project Location: NOT GIVEN

Sampling Date: 08/23/07
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: KS
Analyzed By: BC/KS

LAB NO.	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (>C ₁₀ -C ₂₈) (mg/Kg)	CI* (mg/Kg)
ANALYSIS DATE		08/28/07	08/28/07	08/27/07
H13168-1 VERT. @ SOURCE @ 6' BGS		<10.0	<10.0	288
Quality Control		776	767	500
True Value QC		800	800	500
% Recovery		97.0	95.8	100
Relative Percent Difference		1.6	0.4	<0.1

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI: Std. Methods 4500-CIB

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

RECEIVED

SEP 4 2007

RICE OPERATING
HOBBS NM

Chemist

Date

H13168 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.



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

RICE OPERATING COMPANY

PHONE: (505) 393-9174 FAX: (505) 397-1471
PID METER CALIBRATION & FIELD REPORT FORM

CK.	X
MODEL	
NO.	

MODEL: PGM 7600	SERIAL NO: 110-013676
MODEL: PGM 7600	SERIAL NO: 110-013744
MODEL: PGM 7600	SERIAL NO: 110-012383
MODEL: PGM 7600	SERIAL NO: 110-012920

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO : 07-3264	EXPIRATION DATE: 1-18-07
FILL DATE: 7-18-07	METER READING ACCURACY: 100.0

ACCURACY : +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
VAC	OXY PERMIAN "N" EOL	B	28	17S	35E

SAMPLE ID	PID	SAMPLE ID	PID
VERT. @ SOURCE @ 1'			
2'	0.4		
3'	0		
4'	0		
5'	3.2		
6'	8.4		
7'			
8'			
9'			
10'			
11'			
12'			

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

SIGNATURE:

Ray L. HASCOT

DATE: 8-23-07