

1R - 425-77

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, July 16, 2012 1:28 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 (1R425-77) Termination - ROC Vacuum Jct A-31 Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum Jct A-31 Site
Unit Letter A, Section 31, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-77) 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 June 8, 2012 (received June 12, 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 (1R425-77) 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

RECEIVED OGD

2012 JUN 12 P 12: 43

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 8593

June 8, 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. A-31 (1R425-77): UL/A, Sec. 31, 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 2009, ROC initiated work on the former A-31 junction box as part of the system abandonment. The site is located in UL/A, Sec. 31, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 117 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 3x7x9-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 16 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area. On 4/13/2009, 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", written in a cursive style.

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. A-31	A	31	17S	35E	Lea	eliminated		

LAND TYPE: BLM STATE X FEE LANDOWNER _____ OTHER _____

Depth to Groundwater 117 feet NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 2/23/2009 Date Completed 4/8/2009 OCD Witness no

Soil Excavated 7.0 cubic yards Excavation Length 3 Width 7 Depth 9 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 2/23/2009 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	1.8	<10.0	<10.0	16

LOCATION	DEPTH	mg/kg
background	6"	143
vertical delineation trench at the junction (source)	5'	232
	6'	145
	7'	244
	8'	225
	9'	206

General Description of Remedial Action: This junction box was addressed during the Vacuum SWD System Abandonment. An investigation was conducted at the former junction box site using a backhoe to collect soil samples at regular intervals creating a 3x7x9-ft deep excavation. Chloride field tests were performed on each sample which yielded low concentrations similar to that of the background sample. Organic vapors were measured using a PID which also yielded low concentrations. The deepest sample, 9 ft BGS, was sent to a commercial laboratory for analysis of chloride and TPH. Laboratory analysis confirmed low concentrations of each. Clean, imported soil was used to backfill the excavation to ground surface and to contour to the surrounding area. On 4/13/2009, the site was 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: Katie Jones INITIAL KJ

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE *Larry Bruce Baker Jr.* DATE 11-6-09

Vacuum Jct. A-31

Unit A, Section 31, T17S, R35E



former junction box

10/18/2005



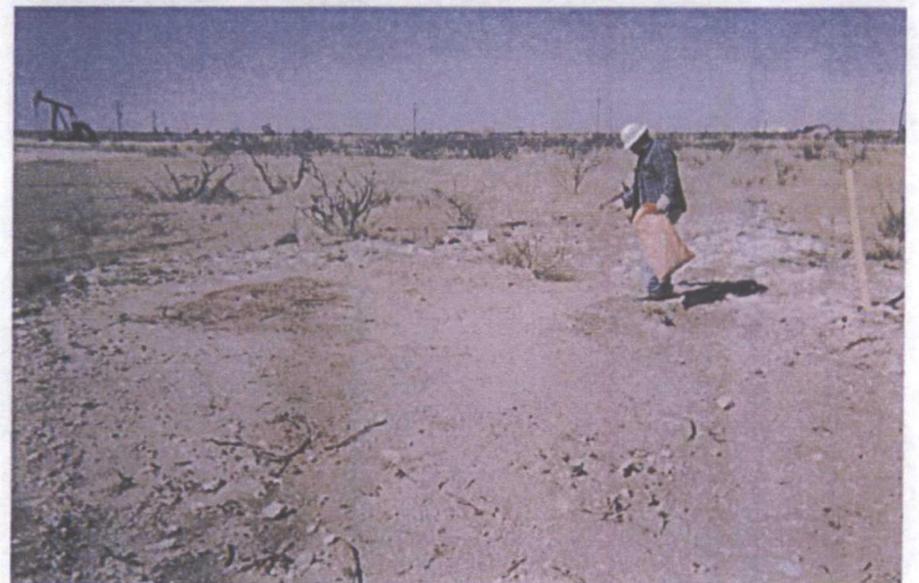
excavating the former junction box site

2/23/2009



excavation at the former junction box site

2/23/2009



seeding the backfilled site

4/13/2009



ANALYTICAL RESULTS FOR
 RICE OPERATING COMPANY
 ATTN: JORDAN WOODFIN
 122 W. TAYLOR
 HOBBS, NM 88240

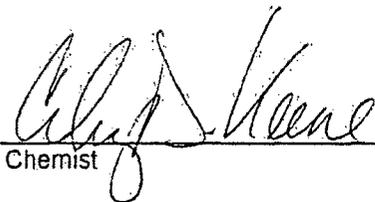
COPY

Receiving Date: 02/23/09
 Reporting Date: 02/25/09
 Project Number: NOT GIVEN
 Project Name: VACUUM JCT A-31
 Project Location: VACUUM JCT A-31

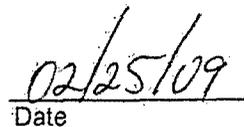
Sampling Date: 02/23/09
 Sample Type: SOIL
 Sample Condition: COOL & INTACT
 Sample Received By: ML
 Analyzed By: AB/HM

LAB NUMBER	SAMPLE ID	GRO	DRO	CI*
		(C ₆ -C ₁₀) (mg/kg)	(>C ₁₀ -C ₂₈) (mg/kg)	(mg/kg)
ANALYSIS DATE		02/25/09	02/25/09	02/25/09
H16955-1	SOURCE BTM GRAB @ 9 FT.	<10.0	<10.0	16
Quality Control		514	584	500
True Value QC		500	500	500
% Recovery		103	117	100
Relative Percent Difference		<0.1	4.0	< 0.1

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI: Std. Methods 4500-CFB
 *Analysis performed on a 1:4 w:v aqueous extract.



 Chemist



 Date

H16955-TCL RICE

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ARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603
(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: RICE Operating				BILL TO				ANALYSIS REQUEST			
Project Manager: JORDAN WOODFIN				P.O. #:				<div style="text-align: center; font-size: 48px; opacity: 0.5;">COPY</div>			
Address: 122 W. TAYLOR				Company:							
City: HOBBS		State: NM		Zip: 88240		Attn:					
Phone #: 575) 393-9174		Fax #:		Address:		City:					
Project #:		Project Owner:		State:		Zip:					
Project Name: Vacuum Jct A-31				Phone #:							
Project Location: Vacuum Jct A-31				Fax #:							
Sampler Name: JORDAN WOODFIN											

FOR LAB USE ONLY	Lab I.D.	Sample I.D.	(G/RAB OR (C)/OMP.	# CONTAINERS	MATRIX						PRESERV.			SAMPLING		DATE	TIME
					GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :				
	H10P55-1	Source Btmg rabe @ 9ft	5	1			X						X			2-23-09	

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Relinquished By: Jordan Woodfin	Date: 2-23-09	Received By: Misty L. Bat	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
	Time: 4:32		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Relinquished By:	Date:	Received By:	REMARKS: Email Results to: BBAKER@Riceswd.com JPurvis@Riceswd.com JWoodfin@Riceswd.com	
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	Sample Condition: Cool <input type="checkbox"/> Intact <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>	CHECKED BY: (Initials) UCB		

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

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:

<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>

Model: PGM 7300 Serial No: 590-000509
 Model: PGM 7300 Serial No: 590-000508
 Model: PGM 7300 Serial No: 590-000504

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

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: 08-3425	EXPIRATION DATE: 10-29-09
FILL DATE: 2-29-08	METER READING ACCURACY: 100

ACCURACY: +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
Vacuum	A-31	A	31	175	35E

Source

SAMPLE ID	PID	SAMPLE ID	PID
5'	24.8	Background	9.7
6'	7.5		
7'	7		
8'	3		
9'	1.8		

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

SIGNATURE: 

DATE: 2-23-09