

1R - 425-102

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, July 26, 2012 2:49 PM
To: Hack Conder (hconder@riceswd.com)
Cc: Leking, Geoffrey R, EMNRD; Laura Pena (lpena@riceswd.com)
Subject: Remediation Plan (1R425-102) Termination - ROC Vacuum J-33 EOL Site

**RE: Update Report and Termination Request
for the Rice Operating Company's
Vacuum J-33 EOL Site
Unit Letter J, Section 33, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-102) 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 22, 2012 (received June 28, 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 (1R425-102) 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 OCD

2012 JUN 28 P 1:00

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 8616

June 22nd, 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: Update Report and Termination Request
Rice Operating Company – ~~SWD~~^{Vac} SWD System
Vacuum J-33 EOL (1R425-102): UL/J sec. 33 T17S R35E**

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 and Previous Work

The site is located approximately 3 miles southeast of Buckeye, New Mexico at UL/J, Sec. 33, T17S, R35E as shown on the Site Location Map (Figure 1). Groundwater at this site is located approximately 61 +/- feet below ground surface (bgs).

In 2010, ROC initiated work on the former ~~EME~~^{Vac} J-33 EOL junction box. The site was delineated using a backhoe to form a 15 ft x 15 ft x 12 ft deep excavation and soil samples were screened at regular intervals for both hydrocarbons and chlorides. From the excavation, the four-wall composite and the bottom composite were taken to a commercial laboratory for analysis. Laboratory tests of the four-wall composite showed a chloride reading of 1,340 mg/kg and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The bottom composite showed a chloride laboratory reading of 416 mg/kg, a GRO reading below detectable limits and a DRO reading of 14.9 mg/kg. The excavated soil was blended on site and returned to the excavation to ground surface. Laboratory analysis of the blended backfill showed a chloride reading of 416 mg/kg and concentrations of GRO and DRO below detectable limits.

The area was contoured to the surrounding landscape and seeded. A junction box closure report (Appendix A) was submitted to NMOCD with all the 2010 junction box closures and disclosures.

Further Evaluation

On February 28th, 2012, NMOCD requested ROC determine chloride concentrations in the vadose zone greater than 12 ft bgs. On April 23rd, 2012, one soil bore was advanced through the former junction box site to a depth of 25 ft bgs. Soil samples were field tested at regular intervals to a depth of 25 ft bgs for chlorides and screened in the field with a photo-ionization detector for hydrocarbons. Representative samples from the bore were taken to a commercial laboratory for confirmation of chloride and hydrocarbon field numbers. Laboratory tests resulted in a chloride concentration of 32 mg/kg at 15 ft bgs and 64 mg/kg at 25 ft bgs. GRO was below detectable limits in both samples. DRO was below detectable limits at 15 ft bgs and 16.9 mg/kg at 25 ft bgs (Appendix B).

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

Figure 1 – Site Location Map
Appendix A – Junction Box Closure Report
Appendix B – Soil Bore Installation Log and Laboratory Analysis

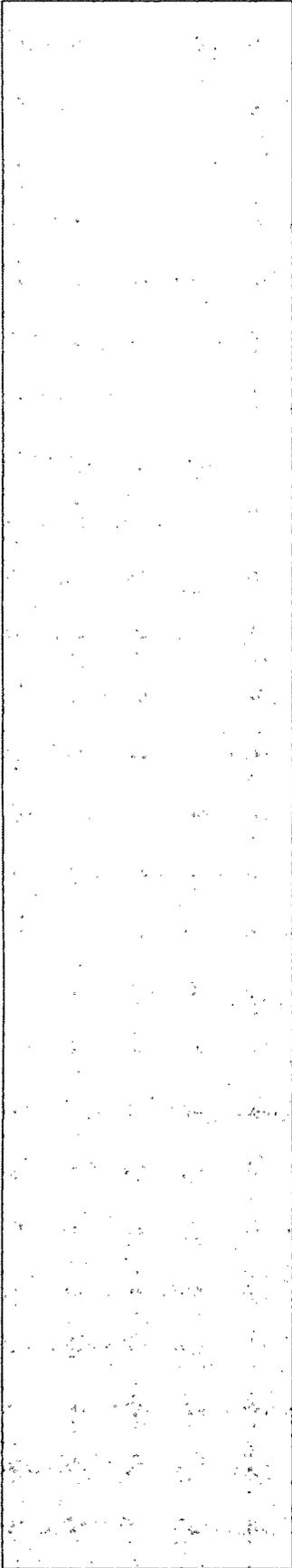


Figure 1
Site Location Map

Appendix A
Junction Box Closure
Report

Vacuum J-33 EOL

Unit J, Section 33, T17S, R35E



Digging initial delineation trench

7/19/2010



Collecting sample

7/19/2010



Loading contaminated soil

8/30/2010



Seeding excavation

9/10/2010

Analytical Results For:

Rice Operating Company
Bruce Baker
112 W. Taylor
Hobbs NM, 88240
Fax To: (575) 397-1471

Received: 07/29/2010
Reported: 08/05/2010
Project Name: VACUUM J-33 EOL 17/35
Project Number: NOT GIVEN
Project Location: VACUUM J-33 EOL 17/35

Sampling Date: 07/28/2010
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: 5 FT BOTTOM COMP @ 12' (H020462-01)

Chloride, SM4500CI-B		mg/kg	Analyzed By: HM							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	416	16.0	08/02/2010	ND	448	112	400	3.64	QM-05	
TPH 8015M		mg/kg	Analyzed By: AB							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	08/04/2010	ND	167	83.5	200	1.23		
DRO >C10-C28	14.9	10.0	08/04/2010	ND	160	80.2	200	0.545		
Surrogate: 1-Chlorooctane	83.4 %	70-130								
Surrogate: 1-Chlorooctadecane	106 %	70-130								

Sample ID: 4-WALL COMP (H020462-02)

Chloride, SM4500CI-B		mg/kg	Analyzed By: HM							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	1340	16.0	08/02/2010	ND	448	112	400	3.64	QM-05	
TPH 8015M		mg/kg	Analyzed By: AB							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	08/04/2010	ND	167	83.5	200	1.23		
DRO >C10-C28	<10.0	10.0	08/04/2010	ND	160	80.2	200	0.545		
Surrogate: 1-Chlorooctane	90.4 %	70-130								
Surrogate: 1-Chlorooctadecane	112 %	70-130								

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

Rice Operating Company
Bruce Baker
112 W. Taylor
Hobbs NM, 88240
Fax To: (575) 397-1471

Received:	07/29/2010	Sampling Date:	07/29/2010
Reported:	08/05/2010	Sampling Type:	Soil
Project Name:	VACUUM J-33 EOL 17/35	Sampling Condition:	Cool & Intact
Project Number:	NOT GIVEN	Sample Received By:	Jodi Henson
Project Location:	VACUUM J-33 EOL 17/35		

Sample ID: BLENDED BACKFILL (H020462-03)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	832	16.0	08/02/2010	ND	448	112	400	3.64	QM-05	

TPH 8015M		mg/kg		Analyzed By: AB						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	08/04/2010	ND	167	83.5	200	1.23		
DRO >C10-C28	174	10.0	08/04/2010	ND	160	80.2	200	0.545		

Surrogate: 1-Chlorooctane 87.9 % 70-130
Surrogate: 1-Chlorooctadecane 116 % 70-130

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Celay D. Keene, Lab Director/Quality Manager

Analytical Results For:

Rice Operating Company
Bruce Baker
112 W. Taylor
Hobbs NM, 88240
Fax To: (575) 397-1471

Received:	08/31/2010	Sampling Date:	08/31/2010
Reported:	09/01/2010	Sampling Type:	Soil
Project Name:	VAC. J-33 EOL 17/35	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Celey D. Keene
Project Location:	NONE GIVEN		

Sample ID: BLENDED BACKFILL W/ IMPORTED SOIL (H020773-01)

Chloride, SM4500Cl-B		mg/kg	Analyzed By: HM							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	416	16.0	08/31/2010	ND	448	112	400	0.00		
TPH 8015M		mg/kg	Analyzed By: AB							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	09/01/2010	ND	163	81.7	200	2.10		
DRO >C10-C28	<10.0	10.0	09/01/2010	ND	181	90.7	200	4.83		

Surrogate: 1-Chlorooctane 80.7% 70-130
Surrogate: 1-Chlorooctadecane 86.1% 70-130

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Celey D. Keene, Lab Director/Quality Manager

CARDINAL 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: <u>Rice Operating Company</u>		BILL TO		ANALYSIS REQUEST											
Project Manager: <u>Bruce Baker</u>		P.D. #:													
Address: <u>122 W. Taylor</u>		Company:													
City: <u>Hobbs</u>	State: <u>NM</u>	Zip: <u>88240</u>	Attn:												
Phone #: <u>575-393-9174</u>	Fax #: <u>575-393-1471</u>	Address:													
Project #:	Project Owner:		City:												
Project Name:		State:	Zip:												
Project Location: <u>Val. J-33 Eol 17/35</u>		Phone #:													
Sampler Name: <u>J. Gatts</u>		Fax #:													

FOR LAB USE ONLY	Lab I.D.	Sample I.D.	(G/RAB OR C/OMP) # CONTAINERS	MATRIX						PRESERV		SAMPLING		DATE	TIME	C.I.	TPH	8015
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE/COOL	OTHER:						
	<u>H20773</u>	<u>Blended Backfill w/ Imported soil</u>	<u>C 1</u>			<u>Y</u>					<u>X</u>		<u>8/31/10</u>	<u>2:00</u>	<u>X</u>	<u>X</u>		

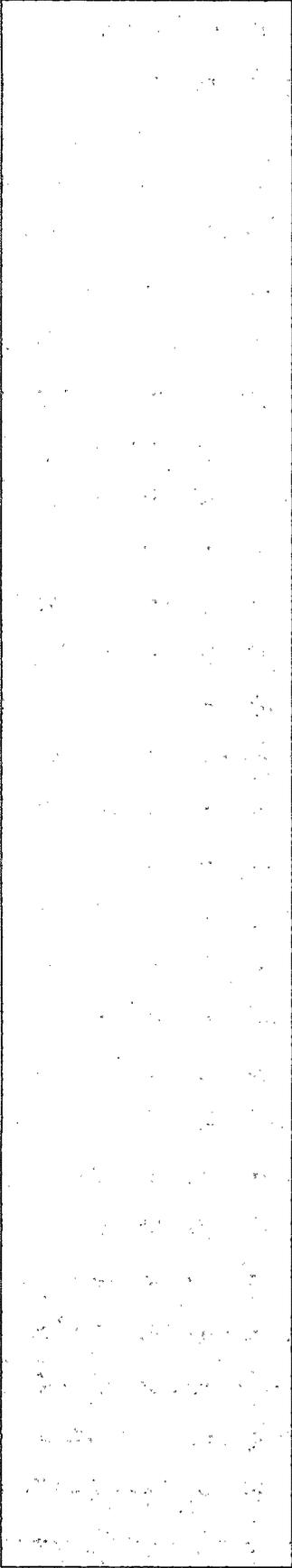
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Relinquished By: <u>Joe Arnd</u>	Date: <u>8/31/10</u>	Received By: <u>[Signature]</u>	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
	Time: <u>4:20</u>		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Relinquished By: <u>[Signature]</u>	Date: <u>8/31/10</u>	Received By: <u>[Signature]</u>	REMARKS: <u>E-Mail Results To: K Jones @ Rice sud.com</u>	
	Time: <u>4:20</u>		<u>Baker " " "</u>	
Delivered By: (Circle One)	Sample Condition	CHECKED BY: <u>cdh</u>	<u>Kegans " " "</u>	
Sampler - UPS - Bus - Other:	<u>11.5°C</u>	Intact <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<u>Jgatts</u>	

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

#26

* Sample just taken & brought to Lab. Not enough time to reach temp.



Appendix B Soil Bore Installation and Laboratory Analysis

April 25, 2012

Hack Conder
Rice Operating Company
112 W. Taylor
Hobbs, NM 88240

RE: VACUUM J-33 EOL 17/35

Enclosed are the results of analyses for samples received by the laboratory on 04/24/12 9:10.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

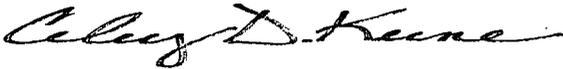
Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Celey D. Keene
Lab Director/Quality Manager

Analytical Results For:

 Rice Operating Company
 Hack Conder
 112 W. Taylor
 Hobbs NM, 88240
 Fax To: (575) 397-1471

 Received: 04/24/2012
 Reported: 04/25/2012
 Project Name: VACUUM J-33 EOL 17/35
 Project Number: NOT GIVEN
 Project Location: VACUUM J-33 EOL 17/35

 Sampling Date: 04/23/2012
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: SB 1 @ 15' (H200930-01)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	04/25/2012	ND	416	104	400	0.00		
TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	04/24/2012	ND	178	89.2	200	0.284		
DRO >C10-C28	<10.0	10.0	04/24/2012	ND	187	93.6	200	0.749		
<i>Surrogate: 1-Chlorooctane</i>		<i>87.9 %</i>	<i>55.5-154</i>							
<i>Surrogate: 1-Chlorooctadecane</i>		<i>84.3 %</i>	<i>57.6-158</i>							

Sample ID: SB 1 @ 25' (H200930-02)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	64.0	16.0	04/25/2012	ND	416	104	400	0.00		
TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	04/24/2012	ND	178	89.2	200	0.284		
DRO >C10-C28	16.9	10.0	04/24/2012	ND	187	93.6	200	0.749		
<i>Surrogate: 1-Chlorooctane</i>		<i>84.5 %</i>	<i>55.5-154</i>							
<i>Surrogate: 1-Chlorooctadecane</i>		<i>82.8 %</i>	<i>57.6-158</i>							

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

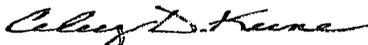
Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C
	Samples reported on an as received basis (wet) unless otherwise noted on report

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Celey D. Keene, Lab Director/Quality Manager

