

1R - 425-99

**APPROVALS**

**YEAR(S):**

2012

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**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Monday, August 13, 2012 1:44 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 (1R425-99) Termination - ROC Vacuum I-3 EOL Site

**RE: Termination Request  
for the Rice Operating Company's  
Vacuum I-3 EOL Site  
Unit Letter I, Section 3, T18S, R35E, NMPM, Lea County, New Mexico  
Remediation Plan (1R425-99) 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 July 5, 2012 (received July 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 conditionally approves the report and hereby notifies you that the remediation plan (1R425-99) is terminated in accordance with 19.15.29 NMAC:

ROC must submit to the OCD an annual status report regarding the ground water recovery system at the site.

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 JUL -9 P 12: 52

## **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 8661

July 5, 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 I-3 EOL (1R425-99): UL/I, Sec. 3, T18S, 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 2010, ROC initiated work on the former I-3 EOL junction box as part of the system abandonment. The site is located in UL/I, Sec. 3, T18S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 50 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x3x9-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 32 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 and contoured to the surrounding area. On 3/3/2011, 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", 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	BOX DIMENSIONS - FEET		
							Length	Width	Depth
Vacuum	I-3 EOL	I	3	18S	35E	Lea	Eliminated		

LAND TYPE: BLM  STATE  FEE LANDOWNER \_\_\_\_\_ OTHER \_\_\_\_\_

Depth to Groundwater 56 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 3/23/2010 Date Completed 3/23/2010 OCD Witness no

Soil Excavated 5.0 cubic yards Excavation Length 5 Width 3 Depth 9 feet

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

FINAL ANALYTICAL RESULTS: Sample Date 3/23/2010 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	0.4	<10.0	<10.0	32

LOCATION	DEPTH	mg/kg
background	6"	152
vertical delineation at former junction (source)	3'	148
	4'	150
	5'	145
	6'	178
	7'	171
	8'	264
	9'	149

**General Description of Remedial Action:** This junction box was addressed during the Vacuum SWD System abandonment. After the former junction box was removed an investigation was conducted using a backhoe to collect soil sample at regular intervals creating a 5x3x9-ft deep excavation. Each sample was field tested for chlorides and organic vapors which yielded low concentrations similar to that of the background sample. The deepest sample, 9 ft BGS, was sent to a commercial laboratory for analysis of chloride and TPH which confirmed low concentrations. The excavated soil was returned to the excavation to ground surface and contoured to the surrounding area. On 3/03/2011, the site was seeded with a blend of native 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.

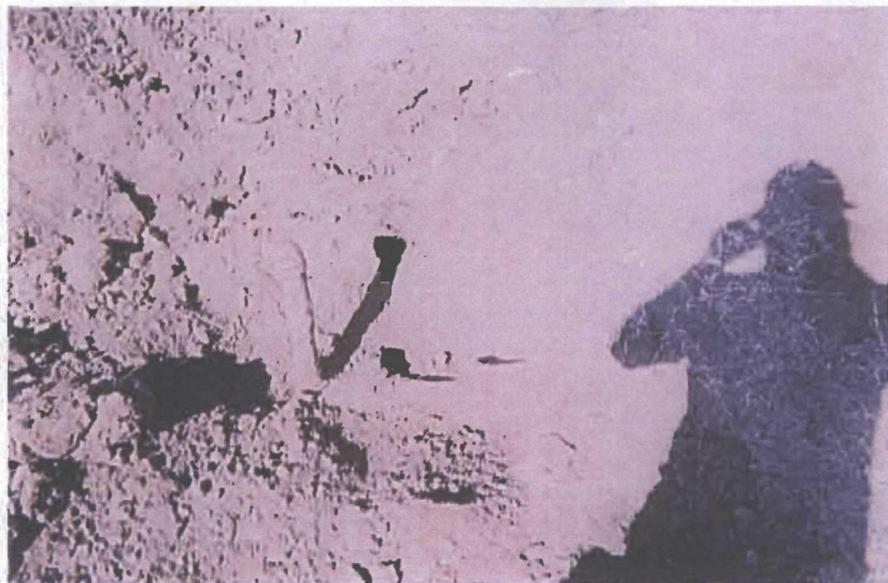
SITE SUPERVISOR Jordan Woodfin SIGNATURE Jordan Woodfin COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Larry Bruce Baker Jr. INITIAL LBB

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE Larry Bruce Baker Jr. DATE 3-23-11

# Vacuum Jct. I-3 EOL

Unit I, Section 3, T18S, R35E



Site prior to delineation

3/23/2010



Collecting sample

3/23/2010



Backfilling excavation

3/23/2010



Seeding excavation

3/03/2011



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR  
 RICE OPERATING COMPANY  
 ATTN: BRUCE BAKER  
 112 W. TAYLOR  
 HOBBS, NM 88240

COPY

Receiving Date: 03/23/10  
 Reporting Date: 03/26/10  
 Project Number: NOT GIVEN  
 Project Name: VACUUM I-3 EOL (18/35)  
 Project Location: VACUUM I-3 EOL (18/35)

Sampling Date: 03/23/10  
 Sample Type: SOIL  
 Sample Condition: COOL & INTACT  
 Sample Received By: JH  
 Analyzed By: AB/HM

LAB NUMBER	SAMPLE ID	GRO	DRO	CI*
		(C <sub>6</sub> -C <sub>10</sub> ) (mg/kg)	(>C <sub>10</sub> -C <sub>28</sub> ) (mg/kg)	(mg/kg)
ANALYSIS DATE		03/25/10	03/25/10	03/24/10
H19532-1	SOURCE BTM GRAB @ 9FT	<10.0	<10.0	32
Quality Control		493	497	500
True Value QC		500	500	500
% Recovery		98.6	99.4	100
Relative Percent Difference		0.6	13.6	< 0.1

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

*Cheryl Keene*  
 Chemist

*03/30/10*  
 Date

H19532 TCL 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. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



# 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

# COPY

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: Rice Operating Company		<b>BILL TO</b>		<b>ANALYSIS REQUEST</b>																								
Project Manager: Bruce Baker		P.O. #:		Chlorides TPH 8015 M BTEX Texas TPH																								
Address: 122 West Taylor		Company:																										
City: Hobbs State: NM Zip: 88240		Attn:																										
Phone #: 575-393-9174 Fax #: 575-397-1471		Address:																										
Project #: Project Owner:		City:																										
Project Name: Vacuum I-3 EOC 18/35		State: Zip:																										
Project Location: Vacuum I-3 EOC 18/35		Phone #:																										
Sampler Name: Jordan Woodfin		Fax #:																										
FOR LAB USE ONLY																												
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP	# CONTAINERS													MATRIX					PRESERV		SAMPLING					
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER	ACID/BASE	ICE / COOL	OTHER	DATE	TIME														
H19532-1	Source btm grab @ 9ft	G	1			✓					✓		3-23-10	2:15p	✓	✓												

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Relinquished By: <b>Jordan Woodfin</b>	Date: 3-23-10 Time:	Received By:	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
Relinquished By:	Date: 3/23/10 Time: 4:30	Received By: <i>Jodi Henson</i>	Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Delivered By: (Circle One) Sample - UPS - Bus - Other:	Sample Condition: Cool Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> No <input type="checkbox"/> No	CHECKED BY: <i>JWH</i>	REMARKS: email results jwoodfin@riceswd.com; jpurvis@riceswd.com bbaker@riceswd.com	

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

#26

NEED SAMPLES BACK, PLEASE

# 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"/>	Model: PGM 7300	Serial No: 590-000183	<input type="checkbox"/>	Model: PGM 7600	Serial No: 110-023920
<input type="checkbox"/>	Model: PGM 7300	Serial No: 590-000508	<input type="checkbox"/>	Model: PGM 7600	Serial No: 110-013744
<input checked="" type="checkbox"/>	Model: PGM 7300	Serial No: 590-000504	<input type="checkbox"/>	Model: PGM 7600	Serial No: 110-013676

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 924503	EXPIRATION DATE: 7-5-12
FILL DATE: 7-1-09	METER READING ACCURACY: 100.9

ACCURACY: +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
Vacuum	I-3 EOL	I	3	185	35E

SAMPLE ID	PID	SAMPLE ID	PID
Source		Background	
2'	3.5	6"	0.0
3'	7.7		
4'	3.5		
5'	3.6		
6'	1.9		
7'	1.5		
8'	0.8		
9'	0.4		

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

SIGNATURE

*John Wolff*

DATE: 3-23-10