

1R - 425-101

**APPROVALS**

**YEAR(S):**

2012

---

**Hansen, Edward J., EMNRD**

---

**From:** Hansen, Edward J., EMNRD  
**Sent:** Monday, August 20, 2012 3:30 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 (1R425-101) Termination - ROC Vacuum I-29 EOL Site

**RE: Termination Request  
for the Rice Operating Company's  
Vacuum I-29 EOL Site  
Unit Letter I, Section 29, T17S, R35E, NMPM, Lea County, New Mexico  
Remediation Plan (1R425-101) 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 approves the report and hereby notifies you that the remediation plan (1R425-101) 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

III 2012

**RICE** *Operating Company*

122 West Taylor • Hobbs, New Mexico 88240  
Phone: (575) 393-9174 • Fax: (575) 397-1471

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

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-29 EOL (1R425-101): UL/I, Sec. 29, 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 2010, ROC initiated work on the former I-29 EOL junction box as part of the system abandonment. The site is located in UL/I, Sec. 29, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 79 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x3x6-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 176 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 6/29/2010, 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.

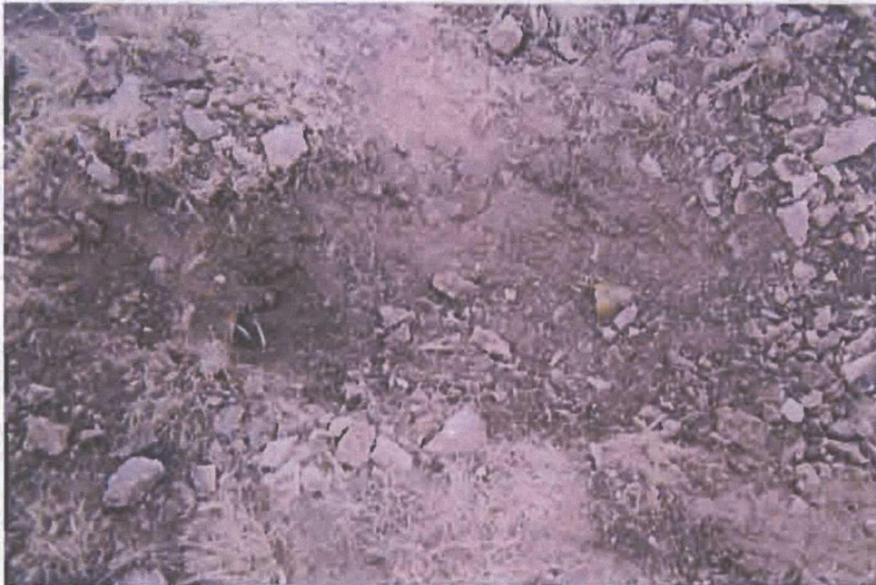
Hack Conder  
Environmental Manager

enclosures



# Vacuum I-29 EOL

Unit I, Section 29, T17S, R35E



Site prior to delineation

6/29/2010



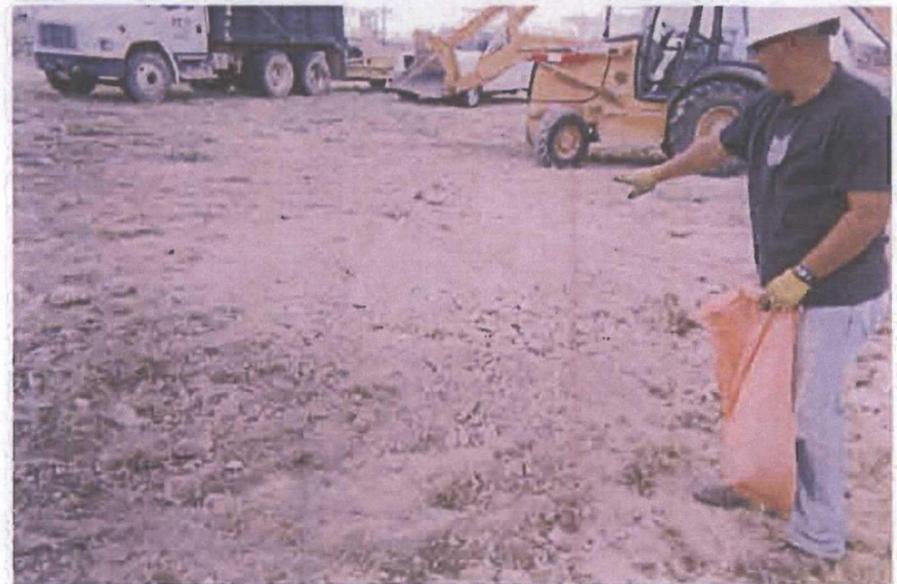
Collecting sample

6/29/2010



Backfilling excavation

6/29/2010



Seeding excavation

6/29/2010



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

Receiving Date: 06/29/10  
 Reporting Date: 06/30/10  
 Project Number: NOT GIVEN  
 Project Name: VACUUM I-29 EOL (17/35)  
 Project Location: VACUUM I-29 EOL (17/35)

Sampling Date: 06/29/10  
 Sample Type: SOIL  
 Sample Condition: COOL & INTACT  
 Sample Received By: JH  
 Analyzed By: AB/CK/HM

LAB NUMBER SAMPLE ID GRO (C<sub>6</sub>-C<sub>10</sub>) (mg/kg) DRO (>C<sub>10</sub>-C<sub>28</sub>) (mg/kg) CI\* (mg/kg)

ANALYSIS DATE	06/30/10	06/30/10	06/30/10
H20241-1 SOURCE @ 6'	<10.0	<10.0	176
Quality Control	487	511	500
True Value QC	500	500	500
% Recovery	97.4	102	100
Relative Percent Difference	3.2	13.0	<0.1

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

*[Signature]*  
 Chemist

07/06/10  
 Date

H20241 TCL RICE

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising out of this report is 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 presented in writing and received by Cardinal within thirty (30) days from 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 or its successors, affiliates or predecessors, 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 theories or otherwise. Results relate only to the samples identified above. Client responsible for proper packaging. Exception: full with written approval of Cardinal Laboratories.



# RICE OPERATING COMPANY

122 West Taylor Hobbs, NM 88240  
 PHONE: (505) 393-9174 FAX: (505) 397-1471  
 PID METER CALIBRATION & FIELD REPORT FORM

CK.	
MODEL	/
NO.	

MODEL: PGM 7300	SERIAL NO: 590-000508
MODEL: PGM 7300	SERIAL NO: 590-000504
MODEL: PGM 7320	SERIAL NO: 592-903318
MODEL: PGM 7300	SERIAL NO: 590-000183

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: <i>930132</i>	EXPIRATION DATE: <i>4-28-2013</i>
METER READING ACCURACY: <i>100 PPM</i>	

ACCURACY: +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
<i>VACUUM</i>	<i>I-29 ROL</i>	<i>1</i>	<i>29</i>	<i>17</i>	<i>75</i>

SAMPLE ID	PID	SAMPLE ID	PID
<i>Back ground</i>	<i>2.6</i>		
<i>SOURCE @</i>	<i>2'</i>		
	<i>3'</i>		
	<i>4'</i>		
	<i>5'</i>		
	<i>6'</i>		

COPY

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

SIGNATURE: *Gerardo Martinez*

DATE: *6-29-10*