1R - 425-100

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, August 20, 2012 3:06 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 (1R425-100) Termination - ROC Vacuum M-31 EOL Site

RE: Termination Request
for the Rice Operating Company's
Vacuum M-31 EOL Site
Unit Letter M, Section 31, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-100) 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 (1R425-100) 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

JUL 9 2012

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

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 M-31 EOL (1R425-100): UL/M, 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 2010, ROC initiated work on the former M-31 EOL junction box as part of the system abandonment. The site is located in UL/M, Sec. 31, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 95 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 5x2x5-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 5-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 208 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 10/25/2010, 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

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	M-31 EOL	M	31	17S	35E	Lea	Eliminated		

LAND TYPE: BLM ___ STATE X FEE LANDOWNER _____ OTHER _____

Depth to Groundwater 95 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 10/18/2010 Date Completed 10/25/2010 OCD Witness no

Soil Excavated 1.9 cubic yards Excavation Length 5 Width 2 Depth 5 feet

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

FINAL ANALYTICAL RESULTS: **Sample Date** 10/20/2010 **Sample Depth** 5 ft

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

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
SOURCE 5' GRAB	0.4	<10.0	<10.0	208

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
background	6"	137
vertical delineation trench at the junction (source)	2'	505
	3'	770
	4'	295
	5'	142

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 a collect soil sample at regular intervals creating a 5x2x5-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, 5 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 10/25/10, 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 John Harrison SIGNATURE _____ COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Zach Conder INITIAL Z.C.

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE Larry Bruce Baker Jr. DATE 2-1-11

Vacuum M-31 EOL

Unit M, Section 31, T17S, R35E

Digging initial vertical delineation trench 10/18/2010

Collecting Sample 10/18/2010

Backfilling site 10/25/2010

Seeding site 10/25/2010

CARDINAL Laboratories

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

Analytical Results For:

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

Received:	10/20/2010	Sampling Date:	10/20/2010
Reported:	10/21/2010	Sampling Type:	Soil
Project Name:	VAC M-31 EOL	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: SOURCE @ 5' (H021109-01)

Chloride, SM4500Cl-B mg/kg **Analyzed By: HM**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**208**	16.0	10/21/2010	ND	416	104	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	10/21/2010	ND	168	84.1	200	6.29	
DRO >C10-C28	<10.0	10.0	10/21/2010	ND	191	95.7	200	11.4	

Surrogate: 1-Chlorooctane	*95.7 %*	*70-130*
Surrogate: 1-Chlorooctadecane	*92.6 %*	*70-130*

COPY

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name: ~~Four Diamond Corp~~
Project Manager: ~~Hoot Bloom~~ BRUCE BAKER
Address: 122 West Taylor
City: Hobbs State: NM Zip: 88240
Phone #: 575-393-9174 Fax #: 575-397-1471
Project #: Project Owner:
Project Name: VAC M 31 EOL
Project Location:
Sampler Name: Robert Harrison

BILL TO
P.O.#:
Company:
Attn:
Address:
City:
State: Zip:
Phone #:
Fax #:

ANALYSIS REQUEST

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP	# CONTAINERS	MATRIX: GROUNDWATER, WASTEWATER, SOIL, OIL, SLUDGE, OTHER	PRESERV: ACID/BASE, ICE / COOL, OTHER	SAMPLING: DATE	SAMPLING: TIME	Chlorides	TPH 8015 M	BTEX	Texas TPH	Complete Cations/Anions
H21171-1	SOURCE @ 5'	G	1	SOIL ✓	ICE / COOL ✓	10/20/10	9:30	✓	✓			

Relinquished By: Robert Harrison Date: 10/20/10 Time: 4:12 Received By:
Relinquished By: Date: 10/20/10 Time: 4:12 Received By:
Delivered By: (Circle One) Sampler - UPS - Bus - Other:
Sample Condition: Cool: Yes / No Intact: Yes / No
CHECKED BY: (Initials)

Phone Result: ☐ Yes ☐ No Add'l Phone #:
Fax Result: ☐ Yes ☐ No Add'l Fax #:
REMARKS:
email results

Bbaker@riceswd.com; Kjones@riceswd.com;
~~Rogans@riceswd.com~~ Rharrison@riceswd.com

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

NEED SAMPLES BACK, PLEASE

#126

RICE OPERATING COMPANY

122 West Tayor Hobbs. NM 88240
PHONE: (575) 393-9174 FAX: (575) 397-1471
PID METER CALIBRATION & FIELD REPORT FORM

Check Model Number:

X	Model: PGM 7300	Serial No: 590-000183		Model: PGM 7600	Serial No: 110-023920
	Model: PGM 7300	Serial No: 590-000508		Model: PGM 7600	Serial No: 110-013744
	Model: PGM 7300	Serial No: 590-000504		Model: PGM 7600	Serial No: 110-013676

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO : 930737	EXPIRATION DATE: 6-16-13
METER READING ACCURACY:	100-1

ACCURACY : +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
VAC	M-31	M	31	17S	35E

SAMPLE ID	PID	SAMPLE ID	PID
Source @4'	0.6		
@5'	0.4		
		COPY	

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

SIGNATUE: [signature]

DATE: 10-20-10