

1R - 425-45

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, September 12, 2012 3:16 PM
To: Hack Conder (hconder@riceswd.com)
Cc: Leking, Geoffrey R, EMNRD; Laura Pena (lpena@riceswd.com); Katie Jones <kjones@riceswd.com> (kjones@riceswd.com); Scott Curtis (scurtis@riceswd.com)
Subject: Remediation Plan (1R425-45) Termination - ROC Vacuum Jct M-35 Site

**RE: Update Report and Termination Request
for the Rice Operating Company's
Vacuum Jct M-35 Site
Unit Letter M, Section 35, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-45) 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 August 28, 2012 (received August 29, 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 (1R425-45) 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

RICE *Operating Company*

122 West Taylor • Hobbs, New Mexico 88240

Phone: (575) 393-9174 • Fax: (575) 397-1471

RECEIVED OCD

2012 AUG 29 P 12:49

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 9378

August 28th, 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 – BD SWD System

Vacuum Jct. M-35 (1R425-45): UL/M sec. 35 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 4 miles southeast of Buckeye, New Mexico at UL/M, Sec. 35, T17S, R35E as shown on the Site Location Map (Figure 1). Groundwater at this site is located approximately 56 +/- feet below ground surface (bgs).

In 2007, ROC initiated work on the former EME M-35 junction box. The site was delineated utilizing a hand auger and were screened for both hydrocarbons and chlorides. The hand auger composite sample at 2 ft bgs was taken to a commercial laboratory for analysis. Laboratory tests of the hand auger composite showed a chloride reading of 16 mg/kg and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The excavated soil was backfilled with clean, imported soil to ground surface.

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 March 1st, 2012, NMOCD requested ROC initiate infiltration mitigation via revegetation of the site. On August 15th, 2012, RECS personnel were on site to seed the surrounding area. The site was seeded with a blend of native vegetation and is expected to return to productive capacity at a normal rate (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), and the site has been seeded with native vegetation. 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 stylized, flowing script.

Hack Conder
Environmental Manager

Figure 1 – Site Location Map
Appendix A – Junction Box Closure Report
Appendix B – Seeding Documentation

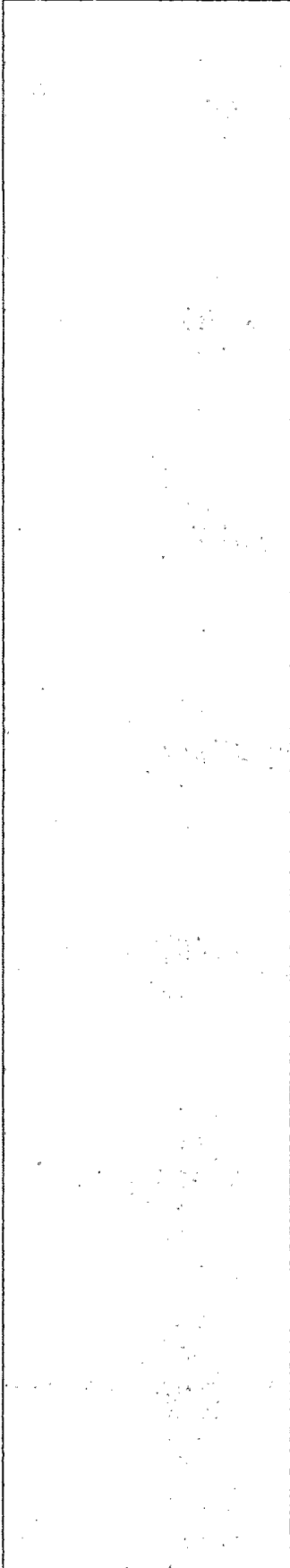
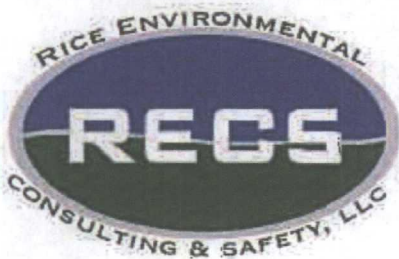
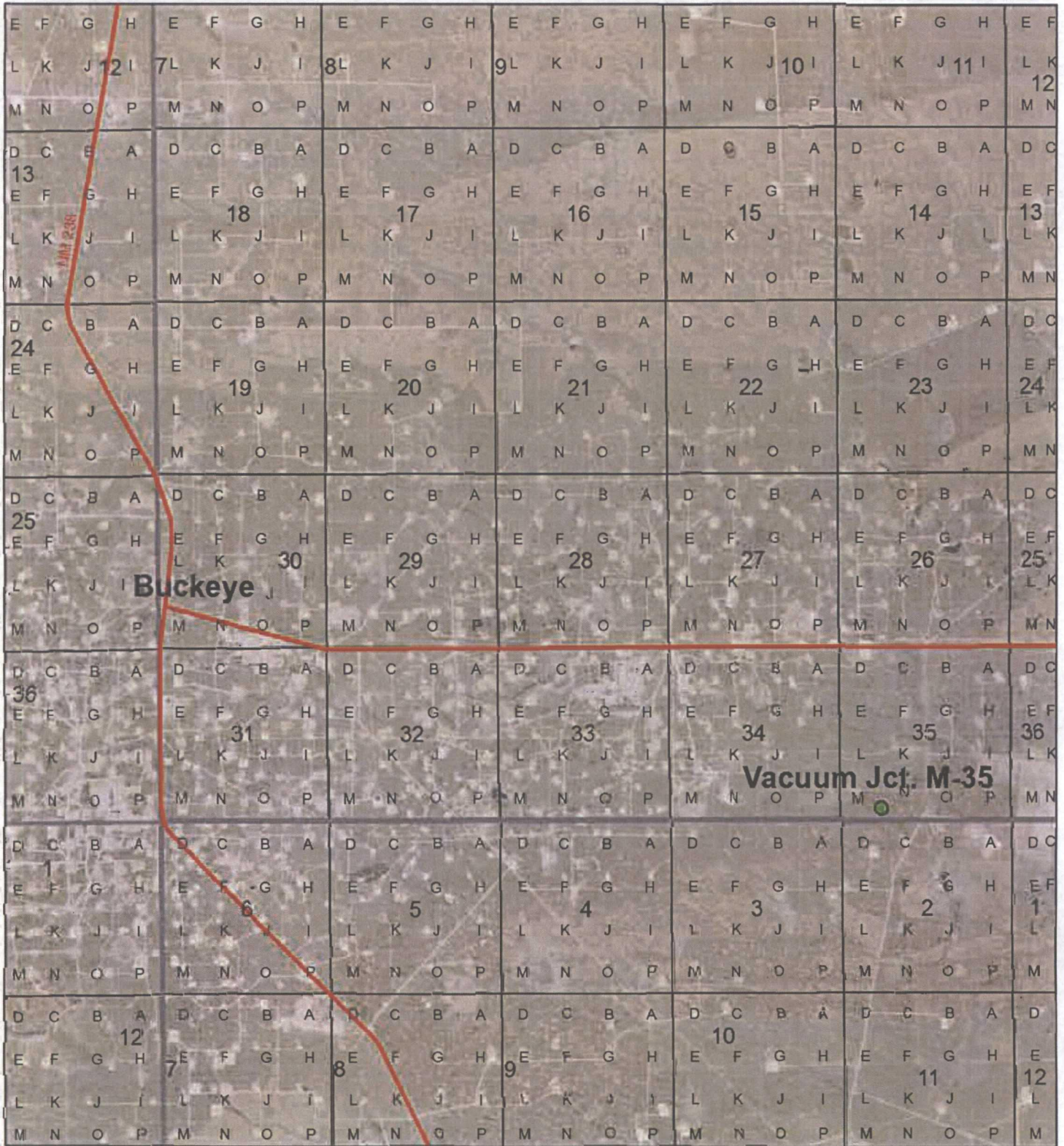


Figure 1
Site Location Map

Site Location Map



Vacuum Jct. M-35

Case #: 1R425-45

Legals: UL/M sec. 35

T-17-S R-35-E

LEA COUNTY, NM



0 0.3 0.6 1.2
Miles

Drawing date: 6-8-12
Drafted by: L. Weinheimer



Appendix A Junction Box Closure Report

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	NEW BOX DIMENSIONS - FEET		
Vacuum	jct. M-35	M	35	17S	35E	Lea	Length	Width	Depth
							junction eliminated--System abandonment		

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

Depth to Groundwater 56 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 7/19/2007 Date Completed 8/17/2007 NMOCD Witness no

Soil Excavated n/a cubic yards Excavation Length n/a Width n/a Depth n/a feet

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

FINAL ANALYTICAL RESULTS: Sample Date 7/19/2007 Sample Depth 2'ft

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

CHLORIDE FIELD TESTS

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
hand auger comp. @ 2 ft BGS	0.0	<10.0	<10.0	16

LOCATION	DEPTH (ft)	ppm
background	1	140
below former jct.	2	202 (avg.)

General Description of Remedial Action:

This junction was addressed as part of the Vacuum SWD System abandonment.

After the box lumber was removed from the former site, the site was inspected and the surrounding soils did not exhibit any signs

of adverse impact from the junction. Soil samples were collected using a hand auger and chloride field tests were conducted on them.

All samples yielded low chloride concentrations similar to that of the background sample. Organic vapors were also measured which resulted

in very low concentrations as well. The deepest sample collected below the junction was analyzed at a commercial laboratory for

confirmation of field tests. Results indicate that TPH was not present within the laboratory's detection limit. The hole from the

former junction box was backfilled with clean, imported soil and contoured to the surrounding surface. The surface was seeded with a blend

of native vegetation on 8/17/2007 and is expected to return to productive capacity at a normal rate.

enclosures: photos, lab results, PID field screenings

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

SITE SUPERVISOR Darnell Mitchell SIGNATURE Darnell Mitchell COMPANY RICE Operating Company

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE Kristin Farris Pope

DATE 10/8/2007 TITLE Project Scientist



undisturbed junction box

8/4/2003

Vacuum jct. M-35

Unit M, Section 35, T17S, R35E



junction box removed; samples collected

7/18/2007



seeding clean, backfilled soil

8/17/2007



CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
RICE OPERATING CO.
ATTN: ROY R. RASCON
122 W. TAYLOR
HOBBS, NM 88240
FAX TO: (505) 397-1471

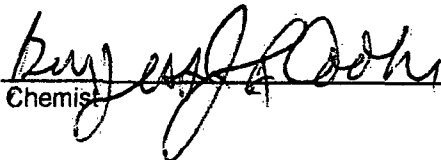
Receiving Date: 07/20/07
Reporting Date: 07/24/07
Project Number: NOT GIVEN
Project Name: NOT GIVEN
Project Location: VACUUM VENT M-35

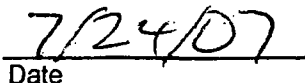
Sampling Date: 07/19/07
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: NF
Analyzed By: BC/HM

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (>C ₁₀ -C ₂₈) (mg/Kg)	CI* (mg/Kg)
		07/20/07	07/20/07	07/20/07
H12939-1	5 PT BOTTOM COMP @ 2'	<10.0	<10.0	16
Quality Control		791	760	490
True Value QC		800	800	500
% Recovery		98.9	95.1	98.0
Relative Percent Difference		<0.1	1.2	2.1

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.


Chemist


Date

H12939 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.



2111 Beachwood, Abilene, TX 79603 101 East Marland, Hobbs, NM 88240

(325) 673-7001 Fax (325) 673-7020 (505) 393-2326 Fax (505) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUIREMENTS

Page 10

Company Name: <u>Rice Operations CO.</u> Project Manager: <u>ROY RABCOISE</u> Address: <u>120 W TAYLOR</u> City: <u>HOLLY</u> State: <u>LA</u> Zip: <u>88240</u> Phone #: <u>393-9174</u> Fax #: <u>397-1471</u> Project #: _____ Project Owner: _____ Project Name: _____ Project Location: <u>VACUUM Vent M-335</u> Sampler Name: <u>John Brooks</u>					BILL TO P.O. #: _____ Company: _____ Attn: _____ Address: _____ City: _____ State: _____ Zip: _____ Phone #: _____ Fax #: _____					ANALYSIS REQUEST <div style="border: 1px solid black; height: 100px; width: 100%;"></div>				
FOR LAB USE ONLY				MATRIX		PRESERV.		SAMPLING		TYPH 8015M C1-				
Lab I.D.	Sample I.D.	(GRAB OR (COMP. # CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:		ICE / COOL	OTHER:	DATE	TIME
<u>H12939-1</u>	<u>5 Ft Bottom Comp @ 2'</u>	<u>C1</u>			<input checked="" type="checkbox"/>						<input checked="" type="checkbox"/>		<u>7-19-07</u>	<u>1230 PM</u>

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 the client for the analysis. All claims, including those for negligence and any other cause whatsoever, shall be deemed waived unless made in writing and received by Cardinal within 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 furnished by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Terms and Conditions: Interest will be charged on all accounts more than 30 days past due at the rate of 24% per annum from the original date of invoice and all costs or collections, including attorney's fees.

Sampler Relinquished By: <u>John Brooks</u> Date: <u>7/20/07</u> Time: <u>9:30AM</u>		Received By: <u>Neil Fullin</u> Date: _____ Time: _____		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No REMARKS: <u>E-mail rrascor@rice SWD . Co</u> <u>CC to J Purvis@rice SWD . Co</u>	
Delivered By: (Circle One) Sampler - UPS - Bus - Other: _____		Sample Condition Temp. °C _____ Intact? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Checked By: <u>NA</u> (Initials)	

† Cardinal cannot accept verbal changes. Please fax written changes to (325) 673-7020.

RICE OPERATING COMPANY

122 West Taylor Hobbs, NM 88240

Phone: (505) 393-9174 Fax: (505) 397-1471

VOC FIELD TEST REPORT FORM

PID METER READING & CALIBRATION

CK.
MODEL
NO.

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

MODEL: PGM 761S
MODEL: PGM 761S
MODEL: PGM 7600
MODEL: PGM 7600

SERIAL NO: 104412
SERIAL NO: 104490
SERIAL NO: 110-12383
SERIAL NO: 110-012920

LOT NO: 06-3070
FILL DATE: 6-16-06
ACCURACY: +/- 2%

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

EXP. DATE: 2-16-07

METER READING ACCURACY: 98.9

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
VACUUM	M-35	M	35	17S	35E

4 wall comp

1 FT.

SAMPLE	PID Results	Sample	PID Results
BACKGROUND	0.0		
SOURCE Control @ 2	0.0		
NW @ 2	0.0		
NE @ 2	0.0		
SE @ 2	0.0		
SW @ 2	0.0		
4 wall Comp @ 2	0.0		

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

SIGNATURE: Danell Mitchell

DATE: 7-19-07



PO Box 5630
Hobbs, NM 88241
Phone: (575) 393-4411
Fax: (575) 393-0293

REVEGETATION FORM

1. General Information

Site name: VACUUM JCT M-35						
U/L M	Section 35	Township 17S	Range 35E	County Lea	Latitude 32°47.082'N	Longitude 103°25.948'W
Contact Name: Bruce Baker						
Email: bbaker@rice-ecs.com						
Site size: 10' x 20' 200 square feet			Map detail of site attached <input type="checkbox"/>			
Additional information:						

2. Soils

**Do not rip caliche subsoils; caliche rocks brought to the surface by ripping shall be removed.*

Salvaged from site <input type="checkbox"/>	Bioremediated <input type="checkbox"/>	Imported <input checked="" type="checkbox"/>	Blended <input type="checkbox"/>	Depth (in): 60 in
Texture: sandy		Describe soil & subsoil: Sandy topsoil		
Soil prep methods: Rip <input type="checkbox"/>	Depth (in):	Disc <input type="checkbox"/>	Depth (in):	Rollerpack <input type="checkbox"/>
Date completed: 7/19/2007				

3. Bioremediation

Fertilizer <input type="checkbox"/>	Hay <input type="checkbox"/>	Other <input type="checkbox"/>
Type:		Describe:
Lbs/acre:		

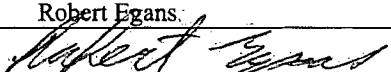
4. Seeding

**Attach seed bag tags to this form. Seed bag tags shall contain the site name and S-T-R.*

Custom seed mix <input checked="" type="checkbox"/>	Prescribed mix <input type="checkbox"/>	Seed mix name: 1 lb side oats grama 1 lb blue grama	Seeding date: 8/15/2012
Broadcast <input checked="" type="checkbox"/>			
Method: hand broadcast			
Soil conditions during seeding: Dry <input checked="" type="checkbox"/> Damp <input type="checkbox"/> Wet <input type="checkbox"/>			
Photos attached <input type="checkbox"/>	Observations: Seed was raked into soil.		
Number of photos:			

5. Certification

I hereby certify that the information in this form and attachments is true and complete to the best of my knowledge and belief.

Name: Robert Egans	Title: Environmental Tech	Date: 8/15/2012
Signature: 		

Vacuum Jct. M-35
Unit Letter M, Section 35, T17S, R35E



Seeding site, facing southwest

8/15/2012



Raking in seed, facing south

8/15/2012