

AP - 48

APPROVALS

YEAR(S):

2012-2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, September 13, 2012 2:06 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); Jeff.Kindley@tetrattech.com
Subject: Abatement Plan (AP-48) Termination - ROC Justis L-1 Boot Site

**RE: Stage 2 Abatement Plan Completion and Termination Request
for the Rice Operating Company's
Justis L-1 Boot Site
Unit Letter L, Section 1, T25S, R37E, NMPM, Lea County, New Mexico
Abatement Plan (AP-48) 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 September 5, 2012). The report is acceptable to the OCD. Please submit to the OCD a final plugging report for groundwater monitoring wells (MW-1, MW-2, MW-3, MW-4 and MW-5) at the site within 90 days of receipt of this notice.

The above-referenced report, submitted in accordance with 19.15.30.19 NMAC [Section 19 of (Part 30; formally, Rule 19)], indicates that Rice Operating Company has met the requirements of 19.15.30.9 NMAC; therefore, the OCD approves the report and hereby notifies you that the abatement plan (AP-48) is terminated in accordance with 19.15.30.19.B 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

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, April 02, 2012 5:27 PM
To: 'Katie Jones'
Cc: Leking, Geoffrey R, EMNRD; Hack Conder; Laura Pena; Reed, Timothy; Kindley, Jeff
Subject: Stage 1 / Stage 2 Abatement Plan (AP-48) Suspension of BTEX Analyses Approval - ROC
Justis L-1 Boot Site

**RE: Stage 1 / Stage 2 Abatement Plan (AP-48) Suspension of BTEX Analyses Approval
for the Rice Operating Company's
Justis L-1 Boot Site
Unit Letter L, Section 1, T25S, R37E, Lea County, New Mexico**

Dear Ms. Jones:

Upon review of the request for suspension of laboratory analyses for BTEX in the Stage / Stage 2 Abatement Plan for the Rice Operating Company's (ROC) Justis L-1 Boot Site, dated March 19, 2012, and associated file documents, the New Mexico Oil Conservation Division (OCD) hereby approves the suspension of laboratory analyses for BTEX at the specified groundwater monitoring well, MW-5 at the above-referenced site.

The above approval is based on either eight consecutive sampling events that indicate that the respective standards have been met or that the four initial sampling events have indicated that there has been no detection of BTEX. However, the OCD may require additional sampling on a case-by-case basis (e.g., increasing concentration trend or elevated concentrations of BTEX in the vadose zone). Therefore, future requests for suspension of laboratory analyses for BTEX must be submitted to the OCD on a case-by-case basis, which include a table of all soil and groundwater monitoring results.

Please be advised that this OCD approval 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

Hansen, Edward J., EMNRD

From: Katie Jones [kjones@riceswd.com]
Sent: Monday, March 19, 2012 10:02 AM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder; Laura Pena; Reed, Timothy; Kindley, Jeff
Subject: ROC - Justis L-1 boot (AP-48) MW-5 BTEX Suspension Request
Attachments: Justis L-1 boot (AP-48) MW-5.pdf

Mr. Hansen,

Rice Operating Company (ROC) respectfully request suspension of groundwater sampling of BTEX in MW-5 at the Justis L-1 boot (AP-48) site. This site is located in Unit L, Section 1, T25S, R37E. ROC is the service provider (agent) for the Justis SWD system and has no ownership of any portion of the pipeline, well, or facility. The Justis SWD system is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis.

The original soil sampling performed during the excavation of the junction box showed minimal PID readings and TPH concentrations below NMOCD guidelines. TPH Concentrations of the sidewall were <100 mg/kg and <10 mg/kg at the bottom of the excavation. Suspension of BTEX sampling for four of the monitor wells (MW-1 through MW-4) was approved by the NMOCD on January 9, 2009. For the past five years (19 consecutive quarters), BTEX in MW-5 has remained below detectable limits. Please see the attached analytical table. Since BTEX has remained below detectable limits for at least eight (8) consecutive quarters, ROC respectfully requests that the NMOCD allow suspension of further BTEX sampling of MW-5 at the site.

If you have any questions or require any additional information, please contact me at (575)393-9174 or Hack Conder at (575)631-6432.

Thank you.

Katie Jones
Environmental Project Manager
RICE Operating Company

Rice Operating Company
Justis L-1 boot (AP-48)
Unit L, Section 1, T25S, R37E

MW	Depth to Water	Sample Date	Chloride	TDS	Benzene	Toluene	Ethyl Benzene	Total Xylenes	Sulfate
5	75.94	5/15/2007	1870	3950	<0.001	<0.001	<0.001	<0.001	655
5	75.61	8/29/2007	1619	4386	<0.002	<0.002	<0.002	<0.006	894
5	75.44	11/14/2007	1940	4306	<0.002	<0.002	<0.002	<0.006	490
5	75.24	2/27/2008	700	1950	<0.002	<0.002	<0.002	<0.006	333
5	75	5/23/2008	850	2450	<0.002	<0.002	<0.002	<0.006	560
5	74.94	8/28/2008	1180	3780	<0.001	<0.001	<0.001	<0.003	842
5	74.76	12/17/2008	416	1480	<0.001	<0.001	<0.001	<0.003	307
5	74.52	2/23/2009	790	2230	<0.001	<0.001	<0.001	<0.003	466
5	74.38	5/28/2009	940	2700	<0.001	<0.001	<0.001	<0.003	600
5	74.14	9/9/2009	1000	2960	<0.001	<0.001	<0.001	<0.003	635
5	74	11/18/2009	188	718	<0.001	<0.001	<0.001	<0.003	134
5	73.79	3/9/2010	980	2940	<0.001	<0.001	<0.001	<0.003	801
5	73.6	6/3/2010	920	2570	<0.001	<0.001	<0.001	<0.003	530
5	73.53	8/24/2010	920	2750	<0.001	<0.001	<0.001	<0.003	572
5	73.33	11/29/2010	710	2440	<0.001	<0.001	<0.001	<0.003	636
5	73.18	3/8/2011	650	2000	<0.001	<0.001	<0.001	<0.003	419
5	72.9	6/15/2011	730	2250	<0.001	<0.001	<0.001	<0.003	528
5	72.74	9/15/2011	820	2340	<0.001	<0.001	<0.001	<0.003	526
5	72.64	12/9/2011	820	2380	<0.001	<0.001	<0.001	<0.003	556