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APPROVALS

YEAR(S):

2003-1999



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor

Governor
Joanna Prukop
Cabinet Secretary

July 22, 2003

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL RETURN RECEIPT NO. 3929 9888

Carolyn Doran Haynes
Operations Engineer
Rice Operating Company
122 West Taylor
Hobbs, New Mexico 88240

RF.

ROC Voluntary Junction Box Upgrade Project OCD 1R0214

Hobbs Salt Water Disposal System

Lea County, New Mexico

Subject:

Revised Plan

Dear Ms. Haynes:

The New Mexico Oil Conservation Division (OCD) is in receipt of the Junction Box Upgrade Work Plan Revision dated July 16, 2003 and hereby approves of the plan with the following conditions:

- All trend line analysis for chlorides shall be developed using a minimum of five data points. If the last data point is greater than 250 ppm, or in OCD's opinion, the trend is not conclusive then OCD may require additional data points for confirmation.
- 2. Each closure report shall contain the information ROC proposed including dated photos taken before, during (maximum depth and width) and after completion.
- 3. Records shall be maintained for the disposal of all waste.
- 4. Special notice as listed in item 4. of the plan shall include any playa lake, dry lakebed or any watercourse.
- 5. ROC shall implement and maintain institutional and/or tangible controls for each site in order to protect the site in the foreseeable future.

Carolyn Doran Hayne July 22, 2003 Page 2

Please be advised that NMOCD approval of this plan does not relieve Rice Operating Company of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Rice Operating Company of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have any questions please do not hesitate to contact me at 505-476-3487 or E-mail WPRICE@state.nm.us.

Sincerely,

Wayne Price- Engineer

cc: Roger Anderson-Environmental Bureau Chief

OCD Hobbs Office,

Rice

From:

Price, Wayne <WPrice@state.nm.us>

To:

'riceswd' <riceswd@gte.net>

Sent:

Monday, July 24, 2000 4:40 PM

Subject:

RE: Junction Box Upgrade Project - Generic Work Plan

This plan is approved subject to the following conditions:

- 1. All sampling and testing shall be pursuant EPA methods.
- Please be advised that NMOCD approval of this plan does not relieve Rice Operating Company of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Rice Operating Company of responsibility for compliance with any other federal, state, or local laws and/or regulations.

> From: riceswd[SMTP:riceswd@gte.net] > Sent: Monday, July 24, 2000 11:54 AM

> To: Price, Wayne

> Cc: Anderson, Ruby

> Subject: Junction Box Upgrade Project - Generic Work Plan

> << File: GenericJctBxFlowchart.xls>><< File:

> GenericJunctionBox72400.doc>><<File: GenericJunctionBoxRvsn72400.doc>>

> The following attachments are the cover letter, work plan with revisions,

> and the flowchart. A hard copy will be mailed today.

> Thank you so much for your time on Friday morning. We are pleased that

> our presentation was met with a positive reception and we are very ready

> to start the project. John Moody is finalizing the list of junction boxes

> that we will be working on, so the list will be ready to submit when the

> plan is approved:

> Thanks again!

> Carolyn

RICE Operating Company

122 West Taylor Hobbs, NM 88240 Phone: (505) 393-9174 Fax: (505) 397-1471

TO:	Warne Price FROM C Harnes
	UMBER: DATE: 1/8/03
COMI	ANY: TOTAL NO. OF PAGE INCLUDING COVER. + Cover
RE.	Jet Box Appr.
NOTE	S/COMMENTS:
	Still trying to locate on E-copy of
	this - will send it back to you
	if we find it morrow!
	Carry
	UDO NOT RECEIVE ALL PAGES INCLUDED, PLEASE CALL THE OFFICE PHONE NUMBER LISTED AT THE TOP OF AGE-THANK YOU

June 1, 1999

CERTIFIED MAIL RETURN RECEIPT NO. Z 357 870 131

Carolyn Doran Haynes Rice Operating Company 122 West Taylor Hobbs, NM 88240

Re: Closure Work Plan for Existing Pits and Below-Grade Redwood Tanks (Generic Closure Work Plan) for Rice Operating Company's saltwater disposal system facilities.

Dear Ms. Haynes:

The New Mexico Oil Conservation Division (NMOCD) has reviewed Rice Operating Company's (ROC) closure work plans dated March 22, 1999 and revisions to the plans dated April 23, 1999 for the saltwater disposal system facilities. The NMOCD Hereby approves the plans subject to the following conditions:

- 1. ROC shall complete all monitor well(s) as follows:
 - a. At least 15 feet of well screen shall be placed across the water table interface with 5 feet of the well screen above the water table and 10 feet of the well screen below the water table.
 - b. An appropriately sized gravel pack shall be set in the annulus around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.
 - c. A 2-3 foot bentonite plug shall be placed above the gravel pack.
 - d. The remainder of the hole shall be grouted to the surface with cement containing 3-5% bentonite.
 - e. A concrete pad shall be placed at the surface around the well. The well shall be installed with a suitable protective locking device.
 - f. The well(s) shall be developed after construction using EPA approved procedures.

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- 2. No less than 48 hours after the well(s) are developed, ground water from all monitor well(s) shall be purged, sampled and analyzed for concentrations of benzene, toluene, ethyl benzene, xylene, polycyclic aromatic hydrocarbons (PAH's), total dissolved solids (T.S.) and New Mexico Water Quality Control Commission (WQCC) metals and major cations and anions using EPA approved methods and quality assurance/quality control (QA/QC) procedures.
- 3. ROC shall notify OCD pursuant to Rule 116 upon discovery of groundwater contamination.
- 4. All final soil samples submitted for laboratory analyses shall be sampled for BTEX (8021), TPH (418.1 or 8015 GRO & DRO) and Chlorides.
- 5. ROC will notify the OCD Santa Fe office and the OCD District office at least 48 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples during OCD's normal business hours.
- 6. ROC is required to sample and provide to NMOCD the analytical test results for each side wall and bottom of any excavated areas. The samples taken shall be tested for BTEX (8021), TPH and Chlorides. Composite samples will be allowed if there are no obvious hot spots. TPH methods can be EPA 418.1, or 8015 if both GRO and DRO are ran. All sampling and testing shall be pursuant to approved EPA methods and procedures.
- 7. All wastes generated during the investigation shall be disposed of at an OCD approved site.
- 8. ROC shall submit a report of the investigations to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office. ROC must receive NMOCD approval before commencing backfilling, liner or new equipment installations. The report shall include the following:
 - a. A description of all investigations, remediation and monitoring activities which have occurred including conclusions, recommendations, risk assessments and request for implementation of any future work and/or closure.
 - b. A geologic/lithologic log and well completion diagram for all soil borings and/or monitor well(s).
 - c. Vertical and horizontal Isopleth maps for remaining contaminants of concern which were observed during the investigations.

Ms: Haynes June 1, 1999 Page 3

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- e. Summary tables of all soil and/or ground water quality sampling results and copies of all laboratory analytical data sheets and associated QA/QC data collected.
- f. The quantity and disposition of all wastes generated.

Please be advised that NMOCD approval of this plan does not relieve ROC of liability should their investigations and/or operations fail to adequately investigate and/or remediate contamination that poses a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve ROC of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,

Wayne Price-Pet. Engr. Spec.

Environmental Bureau

cc: OCD Hobbs Office