

AP - 27

APPROVALS

YEAR(S):

2006-2002

Price, Wayne, EMNRD

From: Price, Wayne, EMNRD
Sent: Wednesday, November 01, 2006 12:43 PM
To: Carolyn Haynes; Kristin Farris Pope
Cc: whearth@msn.com; Johnson, Larry, EMNRD; Hansen, Edward J., EMNRD; VonGonten, Glenn, EMNRD
Subject: AP-27 BD E-15

Dear Ms. Haynes:

OCD is in receipt of an amendment of the Stage 2 plan dated October 25, 2006 issued by Whole Earth Environmental, Inc. on behalf of Rice Operating Company describing additional remediation activity at the site. OCD hereby approves of the activity with the following conditions:

1. ROC notify the District office of these activities.
2. ROC shall submit a comprehensive report describing these activities, including a well completion diagram, boring log, and results of soil samples collected from the well bore taken every five feet. The soil samples shall be analyzed for BTEX, TPH and chlorides using EPA methods. A water sample shall be collected and analyzed for the same constituents listed herein.

Please be advised that NMOCD approval of this plan does not relieve the owner/operator of responsibility should 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 the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

Special Note: During the last OCD/ROC technical meeting ROC had notified OCD this recovery well would be implemented. OCD informed ROC that additional recovery should be placed near MW-2 where the contamination was the highest. ROC has been reluctant to perform these actions do to access and other logistical issues. Therefore, OCD is hereby notifying ROC to submit a plan for OCD approval within 10 days of receipt of this E-mail to install an additional remediation system near MW-2 or another location down gradient of the site to prevent further groundwater contamination. Failure to act will be sufficient reason for OCD to issue a **"Notice of Deficiency"** for the Abatement Plan AP-27.

Please note, Ed Hansen 505-476-3489 E-Mail edwardj.hansen@state.nm.us will be your contact for this project.



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

April 25, 2003

Ms. Carolyn Doran Haynes
Rice Operating Company
122 West Taylor
Hobbs, New Mexico 88240

**RE: ABATEMENT PLAN AP-27
JUNCTION BOX E-15 SITE
LEA COUNTY, NEW MEXICO**

Dear Ms. Haynes

The New Mexico Oil Conservation Division (OCD) has reviewed Rice Operating Company's (Rice) March 31, 2003 "ABATEMENT PLAN AP-27, JUNCTION BOX E-15 SITE, BLINEBRY DRINKARD SWD SYSTEM, UL D&E, SEC 15, T22S, R37E, LEA COUNTY, NEW MEXICO". This document contains Rice's proposed work plan for additional monitoring wells to delineate the extent of ground water contamination related to Rice's Junction Box E-15 Site located in Unit D and Unit E of Section 15, Township 22 South, Range 37 East, Lea County, New Mexico.

The above-referenced work plan is approved with the following conditions:

1. In order to determine the lateral extent of contamination hydraulically downgradient of the site, proposed monitor well MW-6 shall be relocated and installed in the approximate location shown on the attached figure.
2. Monitor wells MW-5, MW-6 and MW-7 shall be constructed as follows:
 - a. Twenty (20) feet of well screen shall be installed across the top of the water table with at least five feet of the well screen above the water table interface.
 - b. An appropriate gravel pack shall be placed around the well screen from the base of the hole up to 2-3 feet above the top of the well screen.
 - c. A 3 foot bentonite plug shall be placed on top of the gravel pack.
 - d. The remainder of the borehole annulus shall be grouted from the bentonite plug to the surface with a cement grout containing 3-5% bentonite.
 - e. A concrete pad and locking well cover shall be installed at the surface.

3. The deep monitor well installed for delineating potential vertical migration of contamination shall be installed adjacent to existing monitor well MW-1.
4. The deep well shall be constructed as follows:
 - a. Ten (10) feet of well screen shall be installed at the base of the aquifer.
 - b. An appropriate gravel pack shall be placed around the well screen from the base of the hole up to 2-3 feet above the top of the well screen.
 - c. A 3 foot bentonite plug shall be placed on top of the gravel pack.
 - d. The remainder of the borehole annulus shall be grouted from the bentonite plug to the surface with a cement grout containing 3-5% bentonite.
 - e. A concrete pad and locking well cover shall be installed at the surface.
5. All monitor wells shall be developed upon completion using EPA approved procedures.
6. No less than 24 hours after the wells have been developed, ground water from all monitor wells shall be purged, sampled and analyzed for concentrations of total dissolved solids (TDS) and major cations and anions using EPA approved methods and quality assurance/quality control (QA/QC) procedures.
7. All wastes generated shall be disposed of at an OCD approved facility or in an OCD approved manner.
8. Rice shall submit a report containing the results of all site investigation and monitoring activities to the OCD Santa Fe Office by July 25, 2003 with a copy provided to the OCD Hobbs District Office. The report shall contain:
 - a. A description of all soil and ground water investigation and monitoring activities.
 - b. Geologic/lithologic logs and well construction logs for the monitor wells.
 - c. A water table potentiometric contour map showing the location of pipelines, excavations, spills, monitoring wells, recovery wells, and any other pertinent site features, as well as, the direction and magnitude of the hydraulic gradient.
 - d. Isopleth maps for contaminants of concern.
 - e. Summary tables of all past and present ground water quality monitoring results including copies of all recent laboratory analytical data sheets and associated QA/QC data.
 - f. The disposition of all wastes generated.
 - g. Recommendations for installation of the proposed site recovery wells.

9. Rice shall notify the OCD at least 48 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and split samples.

Please be advised that OCD approval does not relieve Rice of responsibility if the plan fails to adequately determine the extent of contamination related to Rice's activities. In addition, OCD approval does not relieve Rice of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions, please contact me at (505) 476-3491.

Sincerely,

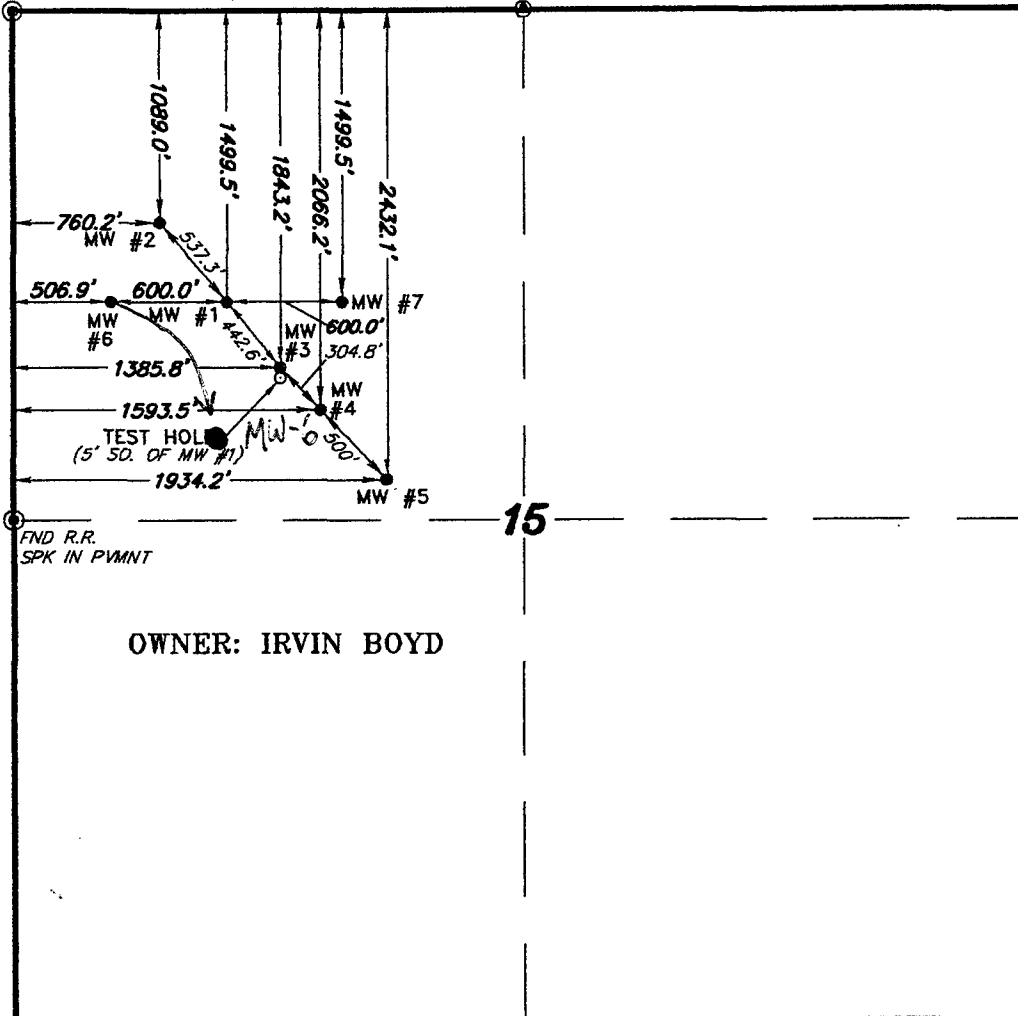
A handwritten signature in black ink, appearing to read 'Will Olson', written in a cursive style.

William C. Olson
Hydrologist
Environmental Bureau

cc: Chris Williams, OCD Hobbs District Office
Mike Griffin, Whole Earth Environmental

SECTION 15, TOWNSHIP 22 SOUTH, RANGE 37 EAST, N.M.P.M.,
LEA COUNTY, NEW MEXICO.

FND R.R.
SPK IN PVMNT N89°59'00"E (BASIS OF BEARINGS) FND
STONE



OWNER: IRVIN BOYD

WELL	GRND ELEV.	PAD ELEV.	NORTHING	EASTING	LATITUDE	LONGITUDE
MW #1	3398.4'	3398.9'	N509096.706	E905055.281	N32°23'38.6"	W103°09'17.9"
MW #2	3398.3'	3398.6'	N509436.578	E904771.875	N32°23'42.0"	W103°09'21.2"
MW #3	3397.6'	3397.8'	N509842.177	E904419.441	N32°23'46.1"	W103°09'25.2"
MW #4	3397.9'	3398.6'	N508876.745	E905266.429	N32°23'36.4"	W103°09'15.5"

I HEREBY CERTIFY THAT THIS PLAT WAS PREPARED
FROM FIELD NOTES OF AN ACTUAL SURVEY AND
MEETS OR EXCEEDS ALL REQUIREMENTS FOR LAND
SURVEYS AS SPECIFIED BY THIS STATE.

7977

GARY L. JONES N.M. P.S. 7977
TEXAS P.L.S. 5074

BASIN SURVEYS P.O. BOX 1786-HOBBS, NEW MEXICO

W.O. Number: 1522 Drawn By: K. GOAD

Date: 03-13-2003 Disk: KJG CD#3 - RC1522A.DWG

1000 0 1000 2000 FEET

RICE OPERATING COMPANY

REF: MONITOR WELLS BD SITE - Jct. Box E-15

MONITOR WELLS LOCATED IN
SECTION 15, TOWNSHIP 22 SOUTH, RANGE 37 EAST,
N.M.P.M., LEA COUNTY, NEW MEXICO.

Survey Date: 03-13-2003 Sheet 1 of 1 Sheets



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

BETTY RIVERA

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

September 16, 2002

Mr. Donnie Anderson
Rice Operating Company
122 West Taylor
Hobbs, New Mexico 88240

**RE: MONITOR WELL AND RECOVERY WELL WORK PLANS
ABATEMENT PLAN AP-27
JUNCTION BOX E-15 SITE
LEA COUNTY, NEW MEXICO**

Dear Mr. Anderson:

The New Mexico Oil Conservation Division (OCD) has reviewed Rice Operating Company's (Rice) September 16, 2002 email and accompanying September 13, 2002 "STAGE 1 AND STAGE 2 ABATEMENT PLAN PROPOSALS (AP-27), JCT. E-15 SITE, UNIT LETTER E, SEC. 15, T22S, R37E, LEA COUNTY, NEW MEXICO" These documents contain Rice's request for a 60 day extension of the deadline for submission of work plan to complete the delineation of the lateral and vertical extent of ground water contamination, and for installation and operation of the site recovery well related to the Stage 1 and Stage 2 abatement plans for Rice's Junction Box E-15 Site located in Unit D and Unit E of Section 15, Township 22 South, Range 37 East, Lea County, New Mexico.

The above-referenced request is approved. Rice shall submit the work plan to complete the delineation of the lateral and vertical extent of ground water contamination including a proposed plan for installation and operation of the site recovery well to the OCD Santa Fe Office by November 10, 2002 with a copy provided to the OCD Hobbs District Office.

If you have any questions, please contact me at (505) 476-3491.

Sincerely,

William C. Olson
Hydrologist
Environmental Bureau

cc: Chris Williams, OCD Hobbs District Office
Mike Griffin, Whole Earth Environmental



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Betty Rivera

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

July 10, 2002

CERTIFIED MAIL

RETURN RECEIPT NO: 7001-1940-0004-3929-7327

Mr. Donnie Anderson
Rice Operating Company
122 West Taylor
Hobbs, New Mexico 88240

**RE: STAGE 1 AND STAGE 2 ABATEMENT PLAN PROPOSALS (AP-27)
JUNCTION BOX E-15 SITE
LEA COUNTY, NEW MEXICO**

Dear Mr. Anderson:

The New Mexico Oil Conservation Division (OCD) has reviewed the following Rice Operating Company (Rice) documents:

- May 14, 2002 "ABATEMENT PLAN AP-27: STAGE II, JCT. E-15 RELEASE SITE, BLINEBRY DRINKARD (BD) SWD SYSTEM, UNIT LETTER D&E, SEC. 15, T22S, R37E, LEA COUNTY, NEW MEXICO" and accompanying undated "RICE OPERATING, E-15 SEEP SITE REMEDIATION REPORT".
- February 23, 2002 "COMMENTS RE. JUNCTION BOX E-15 ABATEMENT PLAN (AP-27)" which was submitted on behalf of Rice by their consultant Whole Earth Environmental, Inc.
- October 29, 2001 "(AP-27) STAGE 1 AND STAGE 2 PUBLIC NOTICE, JUNCTION BOX E-15 RELEASE SITE, BD SALT WATER DISPOSAL SYSTEM, SW/4 NW/4 SECTION 15-T22S-R37E, LEA COUNTY, NEW MEXICO".
- June 5, 2001 "ABATEMENT PLAN AP-27: STAGE I AND STAGE II: JUNCTION BOX E-15 SITE, UL D&E, SEC 15, T22S, R37E, BLINEBRY DRINKARD SWD SYSTEM, LEA COUNTY, NEW MEXICO".

These documents contain Rice's proposed Stage 1 and Stage 2 abatement plans and proof of public notice for investigation and remediation of contamination related to Rice's Junction Box E-15 Site located in Unit D and Unit E of Section 15, Township 22 South, Range 37 East, Lea County, New Mexico.

The Stage 1 and Stage 2 Abatement Plans for Rice's Junction Box E-15 site, as contained in the above-referenced documents, are approved with the following conditions:

1. Rice shall submit a work plan to complete the delineation of the lateral and vertical extent of ground water contamination. The work plan shall also include a proposed plan for installation and operation of the site recovery well. The work plan shall be submitted to the OCD Santa Fe Office by September 10, 2002 with a copy provided to the OCD Hobbs District Office.
2. Ground water from all monitor and recovery wells shall be sampled and analyzed on a quarterly basis for concentrations of total dissolved solids (TDS) and major cations and anions using EPA approved methods and quality assurance/quality control (QA/QC) procedures.
3. All wastes generated shall be disposed of at an OCD approved facility or in an OCD approved manner.
4. Rice shall submit an annual report containing the results of all site remediation and monitoring activities. The report shall be submitted to the OCD Santa Fe Office by February 2 of each respective year with a copy provided to the OCD Hobbs District Office. The report shall contain:
 - a. A description of all soil and ground water remediation and monitoring activities which occurred during the previous calendar year.
 - b. Geologic logs and well construction logs for any soil borings, monitor wells and recovery wells constructed during the previous calendar year.
 - c. Quarterly water table potentiometric maps showing the location of pipelines, excavations, spills, monitoring wells, recovery wells, and any other pertinent site features, as well as, the direction and magnitude of the hydraulic gradient.
 - d. Quarterly isopleth maps for contaminants of concern.
 - e. Summary tables of all past and present ground water quality monitoring results including copies of all recent laboratory analytical data sheets and associated QA/QC data.
 - f. Summary tables of the monthly amount of water pumped from each recovery well and the total volume pumped to date.
 - g. The disposition of all wastes generated.
5. Rice shall notify the OCD at least 48 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and split samples.

Please be advised that OCD approval does not relieve Rice of responsibility if the abatement plan fails to adequately remediate or monitor contamination related to Rice' activities. In addition, OCD approval does not relieve Rice of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions, please contact Bill Olson at (505) 476-3491.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger C. Anderson", with a long horizontal flourish extending to the right.

Roger C. Anderson
Environmental Bureau Chief

RCA/wco

cc: Chris Williams, OCD Hobbs District Office
Mike Griffin, Whole Earth Environmental