

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, May 24, 2007 6:20 PM
To: Kristin Pope
Cc: Randall Hicks (Randall Hicks); Prichard, Sharon, EMNRD; Price, Wayne, EMNRD; 'Katie Lee'
Subject: RE: F-35 & G-35 SWD; NMOCD Case #:AP-59

Dear Ms. Pope:

The New Mexico Oil Conservation Division (NMOCD) has reviewed your amended investigation report (dated April 23, 2007) for the above referenced sites. The additional information was very useful in the NMOCD's continuing review of the abatement plan for these sites. However, since the additional investigatory data determined that the vadose zone is contaminated with elevated concentrations of chloride and hydrocarbons at depth, NMOCD is requiring that the vadose zone must be further remediated. Therefore, the NMOCD hereby denies the Vadose Zone Remedy (dated February 2, 2007) for these sites. Since this Remedy was originally tested in dryer climate compared to the precipitation that does occur at these sites, there could be "break-through" during wetter precipitation periods.

Therefore, this Remedy would involve long-term monitoring to ensure its effectiveness and the NMOCD does not have the resources to monitor these sites on a long-term basis (and Rice Operating Company would be better served spending their limited resources on shorter term remedies). Rice Operating Company must submit a revised Vadose Zone Remedy within 30 days to the NMOCD that includes a design that will prevent further infiltration through the contaminated vadose zone at these sites.

If you have any questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

From: Katie Lee [mailto:katie@rthicksconsult.com]
Sent: Monday, April 23, 2007 12:40 PM
To: Price, Wayne, EMNRD; Hansen, Edward J., EMNRD; Prichard, Sharon, EMNRD
Cc: Kristin Pope; Randall Hicks (Randall Hicks)
Subject: F-35 & G-35 SWD; NMOCD Case #:AP-59

Ladies and Gentlemen,

Attached please find our report, on behalf of Rice Operating Company, regarding agreed upon work conducted on 4-16-2007 at the above referenced sites.

Hard copies follow via the post. We look forward to your response.

Best regards,

Katie Lee

5/24/2007

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