

1R - 426-35

**GENERAL  
CORRESPONDENCE**

**YEAR(S):  
2005-**



Mr. Roger Anderson  
Environmental Bureau Chief  
New Mexico Oil Conservation Division  
1220 So. Saint Francis Drive  
Santa Fe, New Mexico 87505

ARCADIS G&M, Inc.  
1004 North Big Spring Street  
Suite 300  
Midland,  
Texas 79701  
Tel 432 687 5400  
Fax 432 687 5401  
www.arcadis-us.com

Environmental

Subject:  
BD Junction I-27, NMOCD Case No. 1R0426-35

Dear Mr. Anderson:

Date:  
18 October 2005

On behalf of Rice Operating Company (ROC), ARCADIS respectfully requests your approval of closure of the above-referenced site. Your letter dated July 21, 2005 requested two conditions required for approval. Your request and our fulfillment of the request are as follows:

Contact:  
Sharon Hall

**1. Please provide documentation showing how ROC plans to implement institutional and/or engineering controls to protect the liner in the foreseeable future.**

Phone:  
432 687-5400

The corners of the liner will be marked with signs reading "RICE Poly liner at 11 ft." ROC will inspect the site periodically as part of their routine operations.

Email:  
shall@arcadis-us.com

**2. Please provide documentation showing that monitor well has been properly plugged and abandoned.**

Our ref:  
MT000858

Attached is the *New Mexico Office of the State Engineer Well Record* plugging report that has been submitted to the State Engineer's office. Also attached are photos of plugging activities.

As customary for the ROC Junction Box sites ROC will submit a Junction Box Closure Form for the site with the 2005 annual reports.

If you have any questions regarding this request for site closure please do not hesitate to call Kristin Farris Pope at (505) 393-9174 or me at (432) 687-5400.

Sincerely,

ARCADIS G&M, Inc.

*Sharon E. Hall*

Part of a bigger picture

**ARCADIS**

Mr. Roger Anderson  
18 October 2005

Sharon E. Hall  
Site Evaluation Department Manager

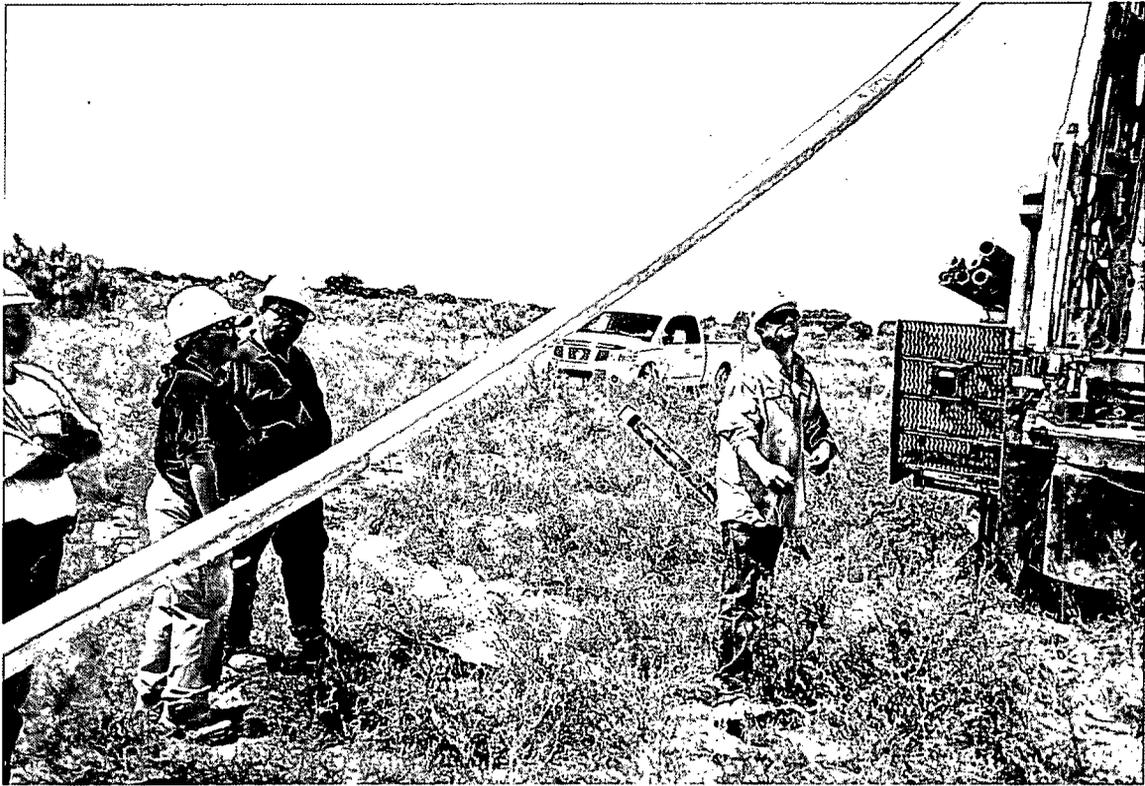
Attachments:  
Site photographs  
Well Plugging Report

Copies:

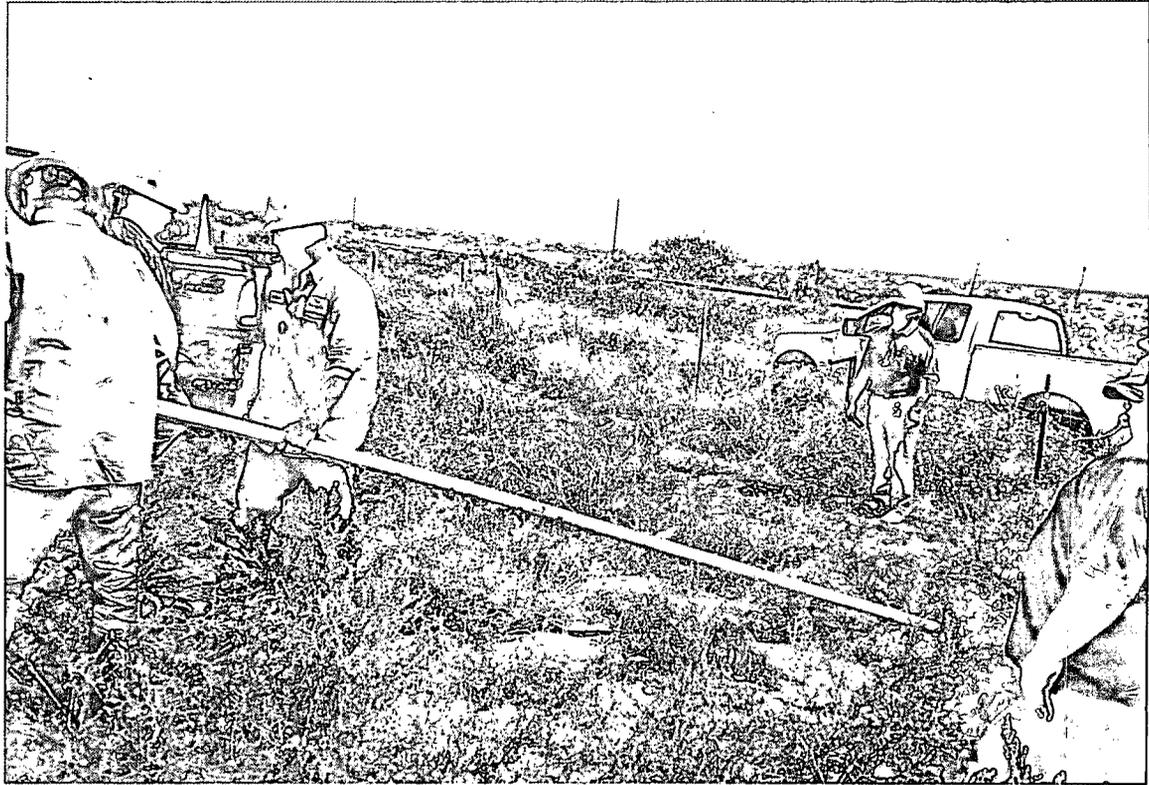
Mr. Wayne Price, NMOCD  
Mr. Daniel Sanchez, NMOCD  
Kristin Farris Pope, ROC



**Plugging of BD Junction  
I-27 Monitor Well**



**Casing Removal  
BD Junction I-27**



**Casing Removal  
BD Junction I-27**

File Number: \_\_\_\_\_

NEW MEXICO OFFICE OF THE STATE ENGINEER  
WELL RECORD

1. OWNER OF WELL

Name: Rice Operating Work Phone: 505-393-9174  
Contact: \_\_\_\_\_ Home Phone: \_\_\_\_\_  
Address: 122 West Taylor  
City: Hobbs State: NM Zip: 88240

2. LOCATION OF WELL (A, B, C, or D required, E or F if known)

A. 1/4 1/4 1/4 Section: 27 Township: 21S Range: 37E N.M.P.M.  
in Lea County.

B. X = \_\_\_\_\_ feet, Y = \_\_\_\_\_ feet, N.M. Coordinate System  
Zone in the \_\_\_\_\_ Grant.  
U.S.G.S. Quad Map \_\_\_\_\_

C. Latitude: 32 d 26 m 46.4 s Longitude: 103 d 08 m 45.7 s

D. East \_\_\_\_\_ (m), North \_\_\_\_\_ (m), UTM Zone 13, NAD \_\_\_\_\_ (27 or 83)

E. Tract No. \_\_\_\_\_, Map No. \_\_\_\_\_ of the \_\_\_\_\_ Hydrographic Survey

F. Lot No. \_\_\_\_\_, Block No. \_\_\_\_\_ of Unit/Tract \_\_\_\_\_ of the  
\_\_\_\_\_ Subdivision recorded in \_\_\_\_\_ County.

G. Other: \_\_\_\_\_

H. Give State Engineer File Number if existing well: \_\_\_\_\_

I. On land owned by (required): BD SWD System

3. DRILLING CONTRACTOR

License Number: WD-1456  
Name: White Drilling Company, Inc. Work Phone: 325-893-2950  
Agent: John W. White Home Phone: 325-893-2950  
Mailing Address: P.O. Box 906  
City: Clyde State: TX Zip: 79510

4. DRILLING RECORD BDI#27

Drilling began: \_\_\_\_\_; Completed: \_\_\_\_\_; Type tools: \_\_\_\_\_  
Size of hole: \_\_\_\_\_ in.; Total depth of well: \_\_\_\_\_ ft.;  
Completed well is: \_\_\_\_\_ (shallow, artesian);  
Depth to water upon completion of well: \_\_\_\_\_ ft.

File Number: \_\_\_\_\_  
Form: wr-20 page 1 of 4 Trn Number: \_\_\_\_\_

File Number: \_\_\_\_\_

**NEW MEXICO OFFICE OF THE STATE ENGINEER  
WELL RECORD**

**5. PRINCIPAL WATER-BEARING STRATA BDI#27**

Depth in Feet		Thickness in feet	Description of water-bearing formation	Estimated Yield (GPM)
From	To			

**6. RECORD OF CASING**

Diameter (inches)	Pounds per ft.	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To

**7. RECORD OF MUDDING AND CEMENTING**

Depth in Feet		Hole Diameter	Sacks of mud	Cubic Feet of Cement	Method of Placement
From	To				

**8. PLUGGING RECORD**

Plugging Contractor: White Drilling Company, Inc.  
 Address: P.O. Box 906, Clyde, TX 79510  
 Plugging Method: Pump Mix  
 Date Well Plugged: 08/26/05  
 Plugging approved by: Rice Operating by ARLADIS Alan G. Reed, Jr.  
 State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1	55.0	0.0	10.98 Bent. Pellets - 4 sks
2			
3			
4			
5			

File Number: \_\_\_\_\_

Form: wr-20

page 2 of 4

Trn Number: \_\_\_\_\_







Infrastructure, environment, buildings

2005 JUL 15 PM 1 20

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New Mexico Oil Conservation Division  
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Santa Fe, New Mexico 87505

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[www.arcadis-us.com](http://www.arcadis-us.com)

Environmental

Subject:  
BD Junction I-27, NMOCD Case No. 1R0426-35  
Rule 19 Non-Declaration

Dear Mr. Sanchez:

Date:  
14 July 2005

On behalf of Rice Operating Company (ROC), ARCADIS respectfully requests your approval to remove the declaration of the above-referenced as a Rule 19 site. This site was one of several for which you requested an abatement plan in your letter to Carolyn Doran Haynes (ROC) dated May 5<sup>th</sup> 2005. As you point out in your letter, Pursuant to Rule 19.15.1.19 (Rule 19) Prevention and Abatement of Water Pollution requires all responsible persons who are abating water pollution in excess of the standards shall do so pursuant to an abatement plan approved by the director. We believe that following your review of the data submitted with this letter you will agree that the subject site does not require Rule 19 status as groundwater monitoring does not indicate excess of the standards.

Contact:  
Sharon Hall

Phone:  
432 687-5400

Email:  
[shall@arcadis-us.com](mailto:shall@arcadis-us.com)

The attached graph and table summarizes the groundwater chemistry data at the site since groundwater sampling began in 2002. No hydrocarbons are present in groundwater. With the exception of the initial sampling event and two later events I will discuss, chloride concentrations have been consistently below the New Mexico Water Quality Commission (NMWQC) Standard of 250 milligrams per liter (mg/L). We feel that the chloride concentrations detected in the initial sampling (12/2/02) may reflect the fact that an unknown person or persons filled the well with sand and debris following installation before the steel riser was installed.

Our ref:  
MT000858

Two other sampling events (12/21/04 and 1/26/05) exhibited elevated chloride concentrations. You will note that the 12/21/04 data has been removed from the table and graph. This data has been removed because several sites sampled at this time exhibited analytical results indicating elevated chlorides and total dissolved solids (TDS). When the lab was contacted, they confirmed that errors attributed to an analyst had occurred during this time frame. Similar elevated concentrations were observed at sites during the January 2005 time frame as well. ARCADIS suspects laboratory error, but the laboratory has not confirmed error. Elevated chlorides and TDS were not detected in subsequent sampling events in March and June, 2005.

Part of a bigger picture

Additionally, impacted soils at the site have been excavated and removed, and a liner has been installed to mitigate leaching of potential contaminants. Soils that were visibly impacted by hydrocarbons were excavated and landfarmed at the site. The excavation measured 20 feet by 20 feet and was excavated to a depth of 15 feet below ground surface (bgs). Chloride impacted soils were excavated in an area measuring 90 feet by 60 feet to a depth of 11 feet bgs. Clean backfill was placed in the excavation at the 11 to 15 foot interval, and a 20-mil poly liner was placed above the clean backfill. The site was then backfilled with remediated soils and graded. Site diagrams showing map view (horizontal) and profile view (vertical) extent and orientation of the excavation and liner installation are attached. Also attached are photographs showing excavation, installation of the liner and post-site grading.

We hope that following your review of the data submitted with this letter you agree that the subject site does not require Rule 19 status as groundwater monitoring does not indicate an excess of the standards. On behalf of ROC we request that you remove the subject site from Rule 19 status. ROC will continue to monitor the site quarterly and to submit annual reports to the NMOCD advising you of the status of the site.

If you have any questions regarding this request please do not hesitate to call Kristin Farris Pope at (505) 393-9174 or me at (432) 687-5400. I enjoyed the opportunity to meet you at the recent New Mexico Oil and Gas Association in Albuquerque and appreciate your discussion with meeting participants.

Sincerely,

ARCADIS G&M, Inc.

*Sharon E. Hall*

Sharon E. Hall  
Site Evaluation Department Manager

Attachments:

Groundwater chemistry table and graph  
Map-view site diagram  
Profile-view site diagram  
Site photographs

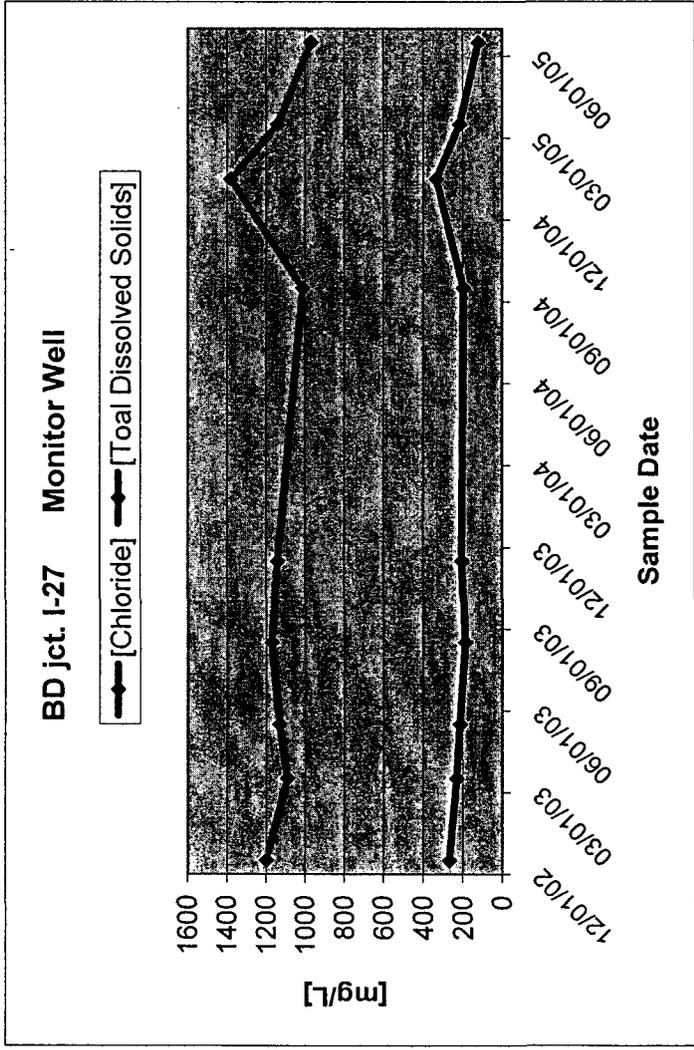
Copies:

Mr. Wayne Price, NMOCD  
Kristin Farris Pope, ROC

**BD jct. I-27**  
unit 'I', Sec. 27, T21S, R37E

All concentrations are in mg/L

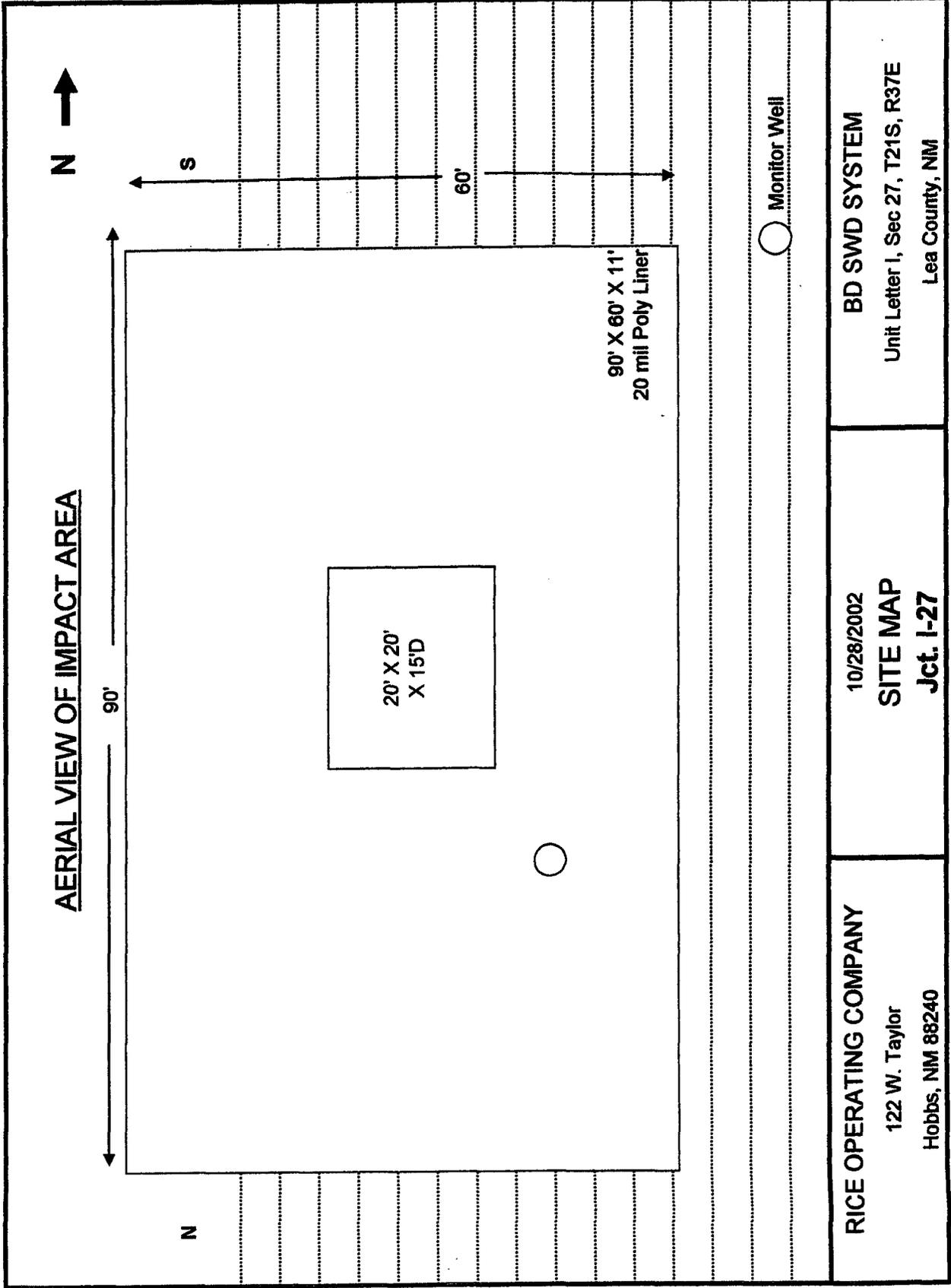
MW #	DEPTH TO WATER *	TOTAL DEPTH	WELL VOLUME	VOLUME PURGED	SAMPLE DATE	Cl <sup>-</sup>	TDS	BENZENE	TOLUENE	ETHYL BENZENE	TOTAL XYLENES	COMMENTS
1	48.39	51.10	0.434	1.45	12/2/02	266	1200	<0.001	<0.001	<0.001	<0.001	silty; bailer
1	46.92	51.01	0.659	1.90	3/24/03	230	1090	0.002	<0.001	<0.001	<0.001	
1	48.01	51.10	0.488	1.40	5/29/03	213	1130	<0.001	<0.001	<0.001	<0.001	
1	49.10	51.01	0.300	1.00	8/22/03	186	1170	<0.001	<0.001	<0.001	<0.001	
1	49.85	51.44	0.254	0.70	11/20/03	204	1140	<0.001	<0.001	<0.001	<0.001	
1	49.20	51.25	XXX	1.00	9/2/04	195	1010	<0.001	<0.001	<0.001	<0.001	
1	44.33	51.02	1.07	3.21	1/26/05	332	1380	<0.001	<0.001	<0.001	<0.001	re-sample
1	43.69	51.00	XXX		3/22/05	215	1140	<0.001	<0.001	<0.001	<0.001	
1					6/27/05	121	968	<0.001	<0.001	<0.001	<0.001	



\* Depth to water is measured from top of casing  
Casing is 2.875 ft

OMITTED--most likely a laboratory error; several sites experienced similar elevated concentrations at that time.

1	43.95	51.00	XXX	3.59	12/21/04	567	2810	<0.001	<0.001	<0.001	<0.001	
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**RICE OPERATING COMPANY**

122 W. Taylor  
Hobbs, NM 88240

10/28/2002

**SITE MAP**

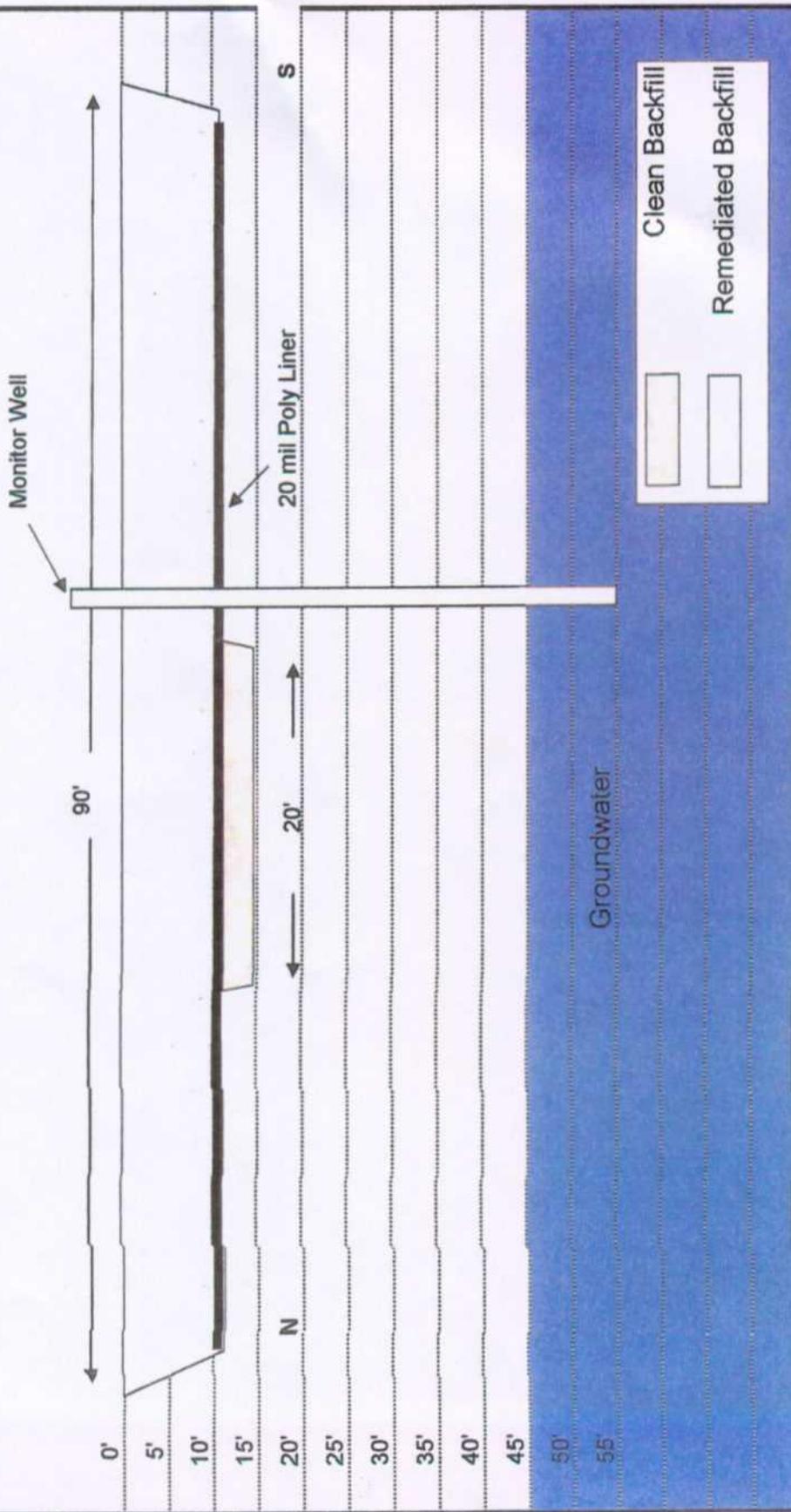
**Jct. I-27**

**BD SWD SYSTEM**

Unit Letter I, Sec 27, T21S, R37E

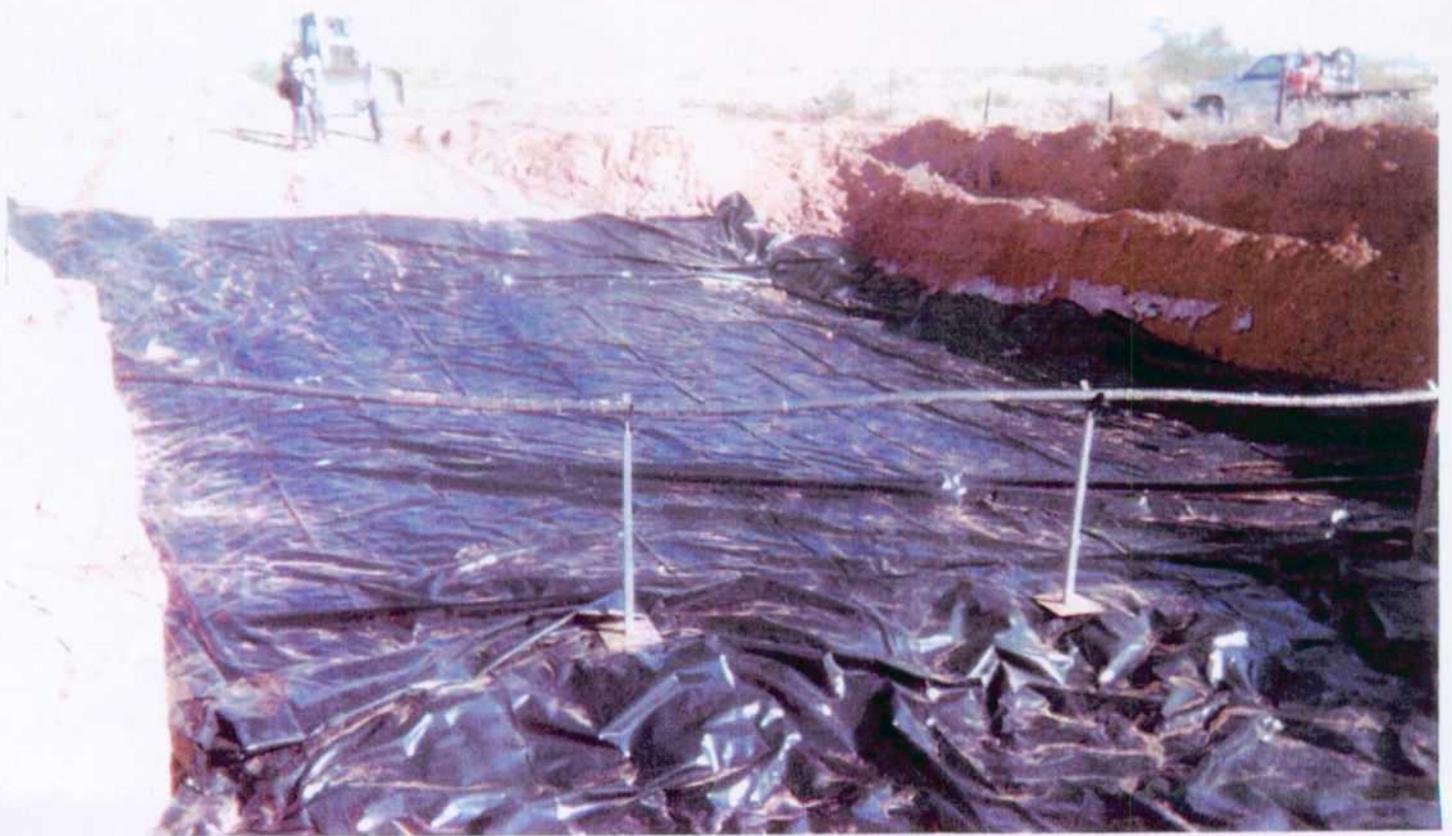
Lea County, NM

PROFILE VIEW OF IMPACT AREA



<p>RICE OPERATING COMPANY 122 W. Taylor Hobbs, NM 88240</p>	<p>10/28/2002 SITE MAP Jct. I-27</p>	<p>BD SWD SYSTEM Unit Letter I, Sec 27, T21S, R37E Lea County, NM</p>
---------------------------------------------------------------------	----------------------------------------------	-------------------------------------------------------------------------------







Infrastructure, environment, buildings

2005 JUL 15 PM 1 20

Mr. Daniel Sanchez  
New Mexico Oil Conservation Division  
1220 So. Saint Francis Drive  
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ARCADIS G&M, Inc.  
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Suite 300  
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Part of a bigger picture

# ARCADIS

Mr. Daniel Sanchez  
14 July 2005

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We hope that following your review of the data submitted with this letter you agree that the subject site does not require Rule 19 status as groundwater monitoring does not indicate an excess of the standards. On behalf of ROC we request that you remove the subject site from Rule 19 status. ROC will continue to monitor the site quarterly and to submit annual reports to the NMOCD advising you of the status of the site.

If you have any questions regarding this request please do not hesitate to call Kristin Farris Pope at (505) 393-9174 or me at (432) 687-5400. I enjoyed the opportunity to meet you at the recent New Mexico Oil and Gas Association in Albuquerque and appreciate your discussion with meeting participants.

Sincerely,

ARCADIS G&M, Inc.

*Sharon E. Hall*

Sharon E. Hall  
Site Evaluation Department Manager

Attachments:

Groundwater chemistry table and graph  
Map-view site diagram  
Profile-view site diagram  
Site photographs

Copies:

Mr. Wayne Price, NMOCD  
Kristin Farris Pope, ROC

**BD jct. I-27**  
unit T, Sec. 27, T21S, R37E

**RICE Operating Company**  
Monitor Well Data Sheet

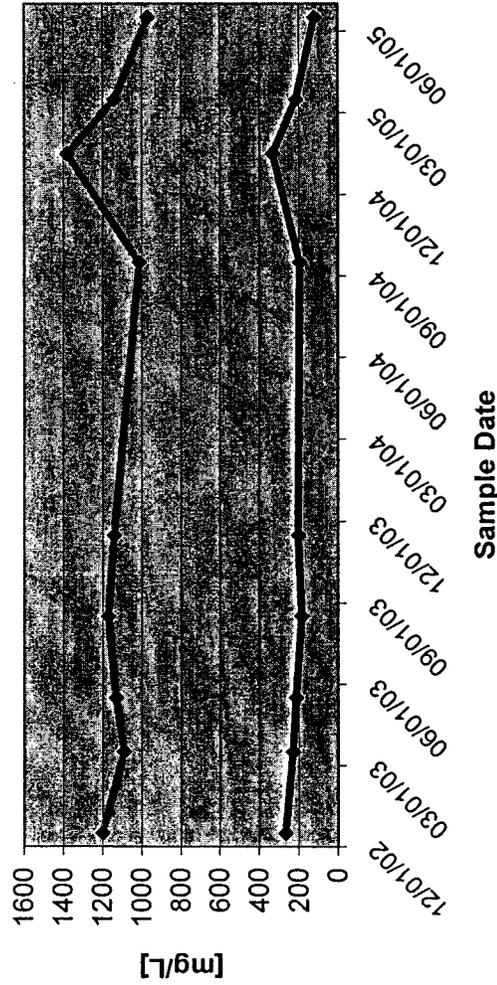
All concentrations are in mg/L

(ft) (gal)

MW #	DEPTH TO WATER *	TOTAL DEPTH	WELL VOLUME	VOLUME PURGED	SAMPLE DATE	CI'	TDS	BENZENE	TOLUENE	ETHYL BENZENE	TOTAL XYLENES	COMMENTS
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1	49.85	51.44	0.254	0.70	11/20/03	204	1140	<0.001	<0.001	<0.001	<0.001	
1	49.20	51.25	XXX	1.00	9/2/04	195	1010	<0.001	<0.001	<0.001	<0.001	
1	44.33	51.02	1.07	3.21	1/26/05	332	1380	<0.001	<0.001	<0.001	<0.001	re-sample
1	43.69	51.00	XXX		3/22/05	215	1140	<0.001	<0.001	<0.001	<0.001	
1					6/27/05	121	968	<0.001	<0.001	<0.001	<0.001	

**BD jct. I-27 Monitor Well**

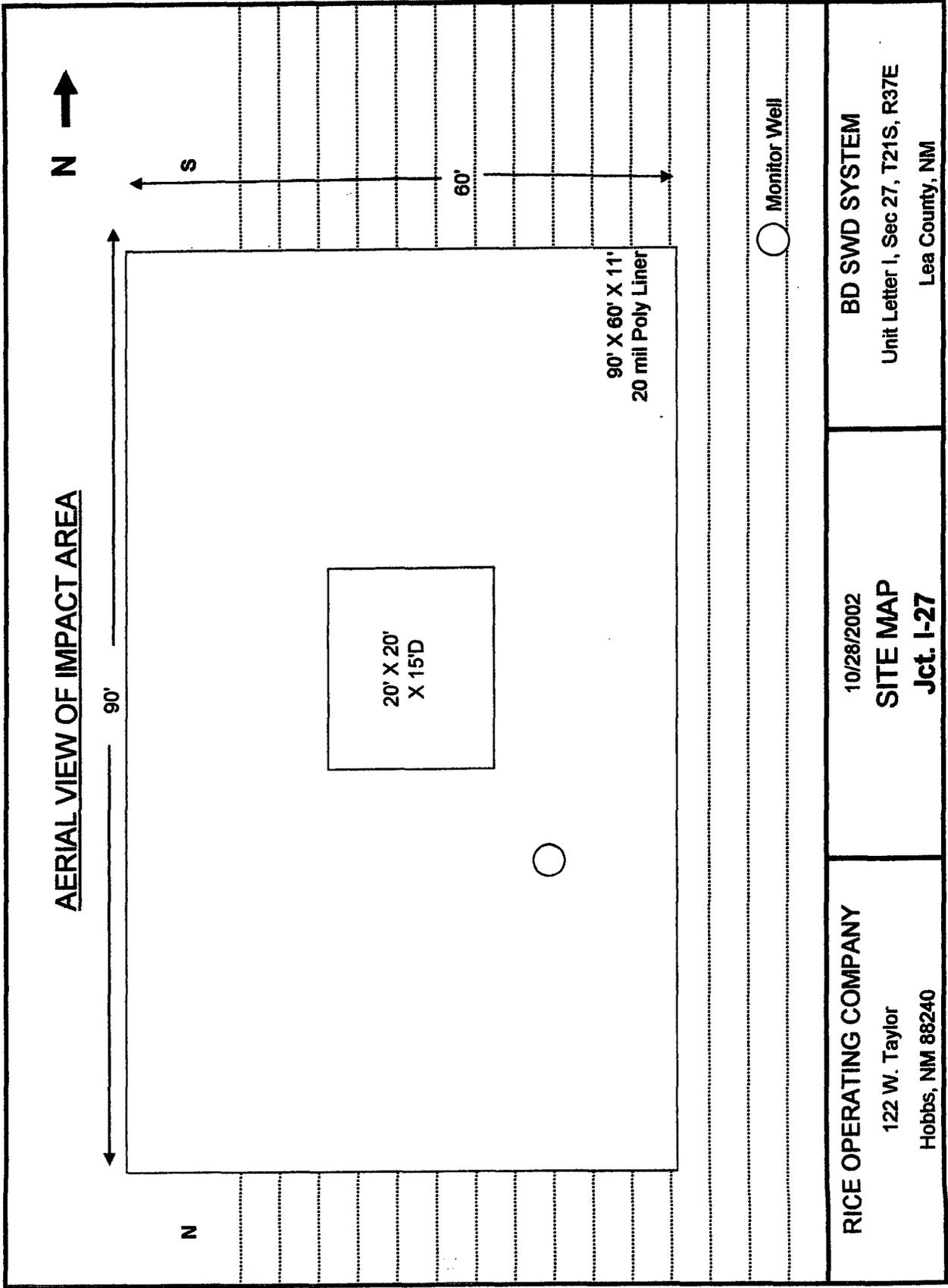
— [Chloride] — [Total Dissolved Solids]



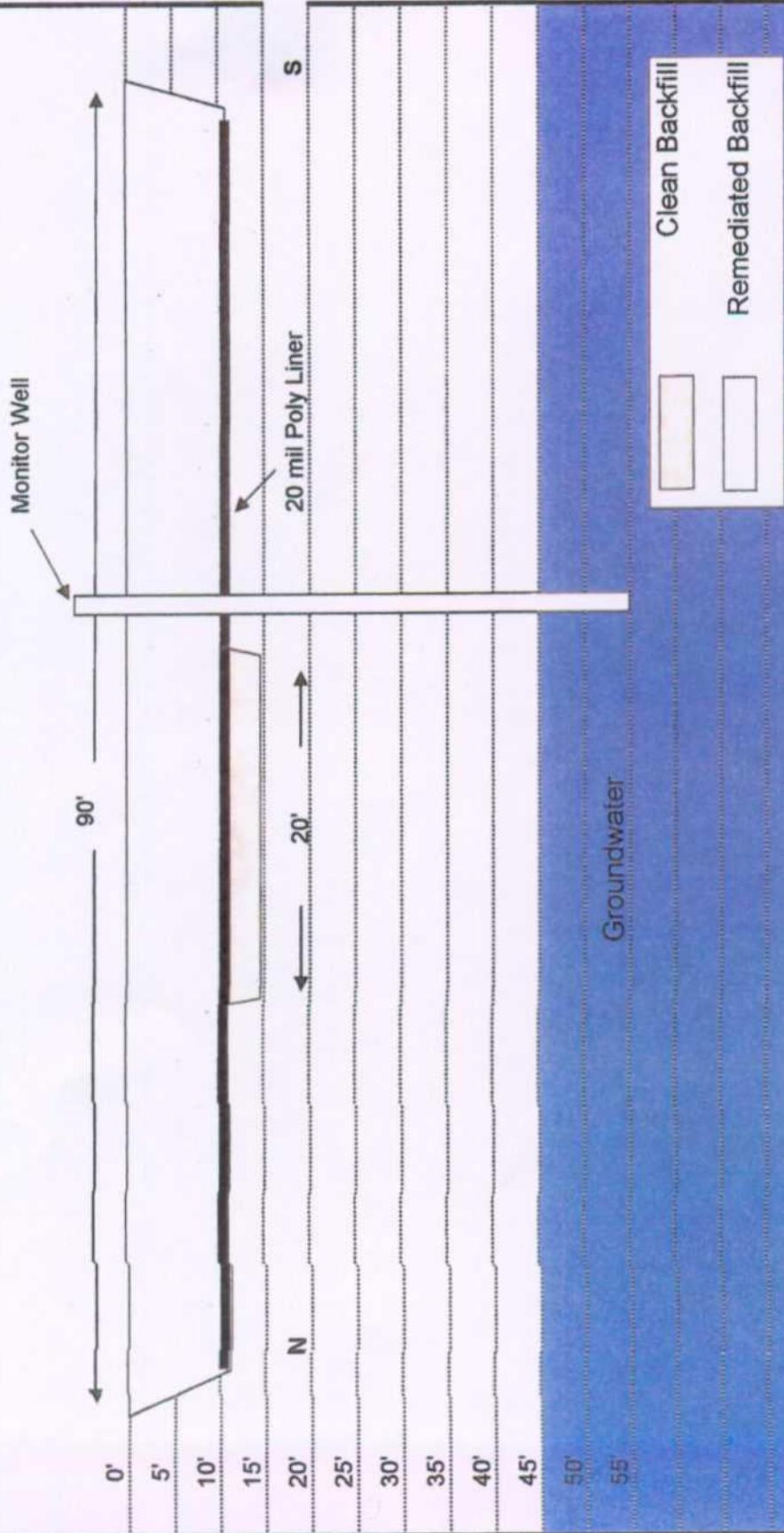
\* Depth to water is measured from top of casing  
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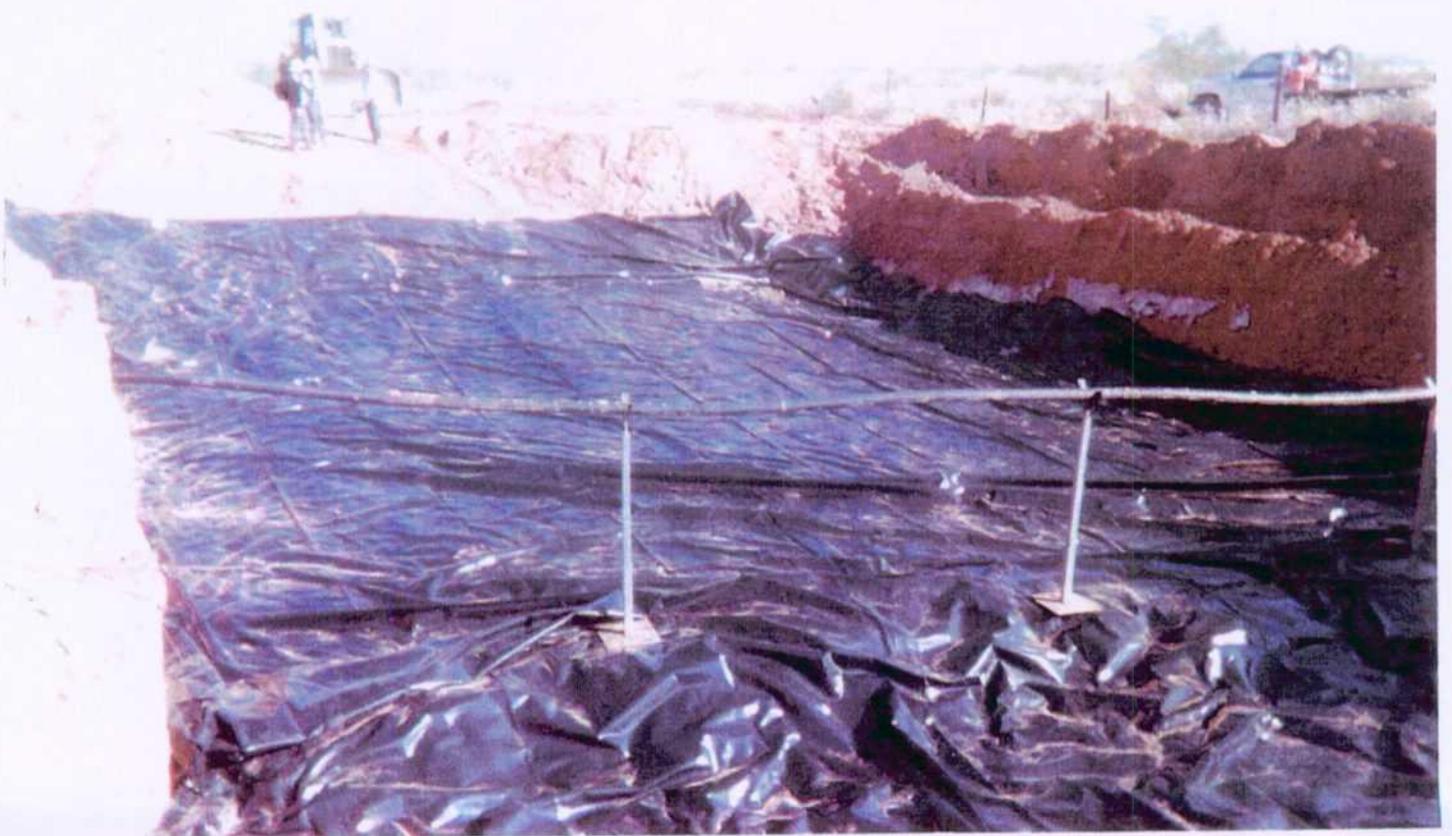
PROFILE VIEW OF IMPACT AREA



	Clean Backfill
	Remediated Backfill

RICE OPERATING COMPANY 122 W. Taylor Hobbs, NM 88240	10/28/2002 SITE MAP Jct. I-27	BD SWD SYSTEM Unit Letter I, Sec 27, T21S, R37E Lea County, NM
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# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**  
Governor

**Joanna Prukop**  
Cabinet Secretary  
**Mark Fesmire**  
Director  
Oil Conservation Division

May 05, 2005

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

Re: Sites with confirmed Groundwater Contamination

Dear Ms. Haynes:

Pursuant to the New Mexico Oil Conservation Division rule 19.15.1.19 (Rule 19) Prevention and Abatement of Water Pollution requires all responsible persons who are abating water pollution in excess of the standards shall do so pursuant to an abatement plan approved by the director.

Therefore, Rice Operating Company is hereby required to submit individual abatement plans for OCD approval by July 15, 2005 for each of the following sites:

**EME Sites:**

H-13	UL	H	Sec 13, T20s, R36E	1R0429
M-9	UL	M	Sec 9, T20s, R37E	1R0331
P-6	UL	P	Sec 6, T20s, R37E	1R0422
Jct. N-5	UL	N	Sec 5, T20S, R37E	1R0427-90
Jct. M-16-1	UL	M	Sec 16, T20S, R37E	1R0427-93
Jct. K-33-1	UL	K	Sec 33, T19S, R37E	1R0427-92
Jct. A-20	UL	A	Sec 20, T20S, R37E	1R0427-89
Jct. K-6	UL	K	Sec 6, T20S, R37E	1R0427-88
Marathon Barber EOL	UL	E	Sec 5, T20S, R37E	1R0427-91
jct. D-1 leak	UL	D	Sec. 1, T20S, R36E	not assigned

**BD Sites:**

Zachary Hinton EOL	UL	O	Sec 12, T22S, R37E	1R0426-36
Jct. J-26	UL	J	Sec 26, T21S, R37E	1R0426-40
Jct. F-17	UL	F	Sec 17, T21S, R37E	1R0426-33
Jct. I-27	UL	I	Sec 27, T21S, R37E	1R0426-35
Jct. N-29	UL	N	Sec 29, T21S, R37E	1R0426-37
jct. E-3	UL	E	Sec 3, T22S, R37E	1R0426-53

**Justis Sites:**

jct. L-1	UL	L	Sec 1, T25S, R37E	1R0423-0
SWD H-2	UL	H	Sec 2, T26s, R37E	1R0423-01

**Hobbs Sites:**

Jct. F-29-1A	UL	F	Sec 29, T18S, R38E	not assigned
I-29 Vent	UL	I	Sec 29, T18S, R38E	not assigned

After OCD receives the plans each site will be assigned a new Abatement Plan number (AP#) for tracking purposes. If you have any questions please do not hesitate to contact me at 505-476-3493 or E-mail

[DJSanchez@state.nm.us](mailto:DJSanchez@state.nm.us); or contact Wayne Price of my staff at 505-476-3487 or e-mail [WPRICE@state.nm.us](mailto:WPRICE@state.nm.us).

Sincerely;



Daniel Sanchez  
Enforcement and Compliance Manager  
DS/wp

Cc: OCD Hobbs office

## Price, Wayne

---

**From:** Kristin Farris [enviro@leaco.net]  
**Sent:** Wednesday, December 08, 2004 4:04 PM  
**To:** Price, Wayne  
**Cc:** Carolyn Haynes  
**Subject:** Re: BD I-27

There is a MW at this site which is being sampled quarterly. The site is on our list of major projects and will be further investigated according to an assigned priority. ROC will submit an annual report at the end of the year summarizing the year's analyses at the well.

Kristin Farris Pope

----- Original Message -----

**From:** "Price, Wayne" <WPrice@state.nm.us>  
**To:** "Carolyn Doran Haynes (E-mail)" <riceswd@leaco.net>; "Kristin Farris Pope (E-mail)" <enviro@leaco.net>  
**Sent:** Wednesday, December 08, 2004 2:53 PM  
**Subject:** BD I-27

> What are your plans for this site?

>

> Sincerely:

>

> Wayne Price

> New Mexico Oil Conservation Division

> 1220 S. Saint Francis Drive

> Santa Fe, NM 87505

> 505-476-3487

> fax: 505-476-3462

> E-mail: WPRICE@state.nm.us

>

>

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> sole use of the intended recipient(s) and may contain confidential and  
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---

## Price, Wayne

---

**From:** Price, Wayne  
**Sent:** Wednesday, December 08, 2004 2:53 PM  
**To:** Carolyn Doran Haynes (E-mail); Kristin Farris Pope (E-mail)  
**Subject:** BD I-27

What are your plans for this site?

Sincerely:

Wayne Price  
New Mexico Oil Conservation Division  
1220 S. Saint Francis Drive  
Santa Fe, NM 87505  
505-476-3487  
fax: 505-476-3462  
E-mail: [WPRICE@state.nm.us](mailto:WPRICE@state.nm.us)