AP - 66

STAGE 2 REPORTS

DATE: 7-16-08

TRIDENT ENVIRONMENTAL

CERTIFIED MAIL
RETURN RECIEPT NO. 7099 3400 0017 1995

July 16, 2008

Mr. Edward Hansen
New Mexico Energy, Minerals, & Natural Resources
Oil Conservation Division, Environmental Bureau
1220 S. St. Francis Drive
Santa Fe, New Mexico 87504

RE: **Request for Closure**
Amended Stage 2 Abatement Plan
EME Jct N-5 Site (AP-66)
T20S, R37E, Section 5, Unit Letter N
Lea County, New Mexico

Mr. Hansen:

In your email request on February 13, 2008 (Attachment A), regarding the *Stage1 Final Investigation Report and Stage 2 Abatement Plan* for the above-referenced site, you requested that Rice Operating Company (ROC) submit an amended plan that included the installation of a groundwater recovery system.

An onsite meeting was conducted by ROC personnel and NMOCD (Edward Hansen) on June 25, 2008, to observe potential sources of offsite impacts. In addition, Trident researched and reviewed historical aerial photography and NMOCD Online well records to provide further evidence of offsite impacts. On July 2, 2008, Trident was onsite to take digital photographs of the observed potential sources. As a result of the onsite meeting, historical aerial photograph review, and digital photographs taken on July 2nd, the following structures appear to have a high potential for being sources of groundwater impact currently being monitored in the vicinity of the N-5 junction box:

- Former tank battery located approximately 100 feet west of the former junction box
- A plugged oil well and remnant asphaltic crude material immediately adjacent to the north side of the former junction box
- A remnant pit located no more than 100 feet southeast of the former junction box
- An old spiral-welded pipeline with obvious external corrosion located about 150 feet southeast of the former junction box

Aerial photographs for the years 1949, 1964, 1966, 1975, and 1978 were obtained from the Earth Data Analysis Center in Albuquerque, NM. In addition a 2003 aerial photograph was obtained from Google DigitalGlobe. A cropped portion the historical aerial photographs are included in Attachment A with full uncut versions on compact disk. After review of these photographs the following observations are made:

Date of photo: 1949 (Quality: Fair):

- Anderson Prichard Oil Company tank battery in place with at least two tanks.
- Large barren area at center is apparent and might be the location of where the original drilling pit for the H. M. Britt B #1 well (API # 30-025-05923) was. The Britt B #1 was put into oil production by Anderson Prichard Oil Company in 1937 according to OCD well records. The well was approved for dual completion and commenced gas production in 1957 along with oil production.
- Ownership of Britt B #1 changed from Anderson Prichard Oil Company to Union Texas Natural Gas Corp in 1961 and then to Union Texas Petroleum Corp in 1962. There are no OCD well records for Britt B #1 between 1962-1976.

Date of photo: 1964 (Quality: Poor):

- Union Texas Petroleum Corp tank battery in place
- Britt B #1 oil & gas well is present (no OCD well records between 1962-1976)
- First evidence of a large pit located southeast of tank battery and the N-5 junction box
- Northwest-Southeast trending ROC pipeline along north side of tank battery and pit
- According to ROC records the N-5 junction box was constructed in1959
- Other non-ROC pipelines evident (stressed vegetation)

Date of photo: 1966 (Quality: Good):

- Best quality photo and the same one used in the Lea County Soil Survey (Sheet No. 125)
- Union Texas Petroleum Corp tank battery in place with four tanks.
- Britt B #1 oil & gas well is present and active
- Large pit located southeast of tank battery and the N-5 junction box is in use. The future location of MW-2 is noted at the southeast edge of the pit.
- Unknown structure between tank battery and large pit
- Northwest-Southeast trending ROC pipeline along north side of tank battery and pit
- Other non-ROC pipelines evident (stressed vegetation)

Date of photo: 1975 (Quality: Poor):

- Union Texas Petroleum Corp tank battery still in place with three tanks.
- Large pit located southeast of tank battery has been backfilled
- Other non-ROC pipelines evident (stressed vegetation)

Date of photo: 1978 (Quality: Fair):

- Union Texas Petroleum Corp tank battery in place with three tanks.
- According to OCD well records the Britt B #1 oil & gas well was plugged in 1977 (just previous to this photo)
- Other non-ROC pipelines evident (stressed vegetation)

Date of photo: 2003 (Quality: Good):

- Union Texas Petroleum Corp tank battery removed sometime after 1978.
- Outline of large pit still evident
- Outline of Britt B #1 well site still evident
- Non-ROC pipeline with circular outline of spill evident (stressed vegetation).

Digital photographs were taken in the area on July 2, 2008, to provide close-up visual documentation of the features noted above (Attachment B). The digital photos clearly show historical impacts to the surface from the offsite sources referenced above.

After extensive review of previous investigations, the results of the Stage 1 investigation, and research and review of historical aerial photographs we have concluded that operation of the former N-5 junction box has not caused or contributed to the degradation of groundwater quality at the site. Evidence from vadose zone characterization and over six years of groundwater monitoring continue to support the conclusion that conditions at the site do not meet the criteria that would mandate corrective action under Rule 19; therefore ROC respectfully requests closure of the regulatory file for this site. Upon NMOCD approval of site closure, ROC will plug the monitoring wells.

Thank you for your consideration concerning this request for site closure. If you have any questions, please contact me at (432) 638-8740 or Hack Conder at (505) 393-9174.

Sincerely,

Gilbert J. Van Deventer, PG, REM

Attachments: historical aerial photographs, recent digital photographs, and compact disk)

cc: Marvin Burrows (ROC)
Hack Conder (ROC)
Chris Williams (NMOCD-District 1)

ATTACHMENT A

HISTORICAL AERIAL PHOTOGRAPHS

(1949, 1964, 1966, 1975, 1978, and 2003)

Observations:

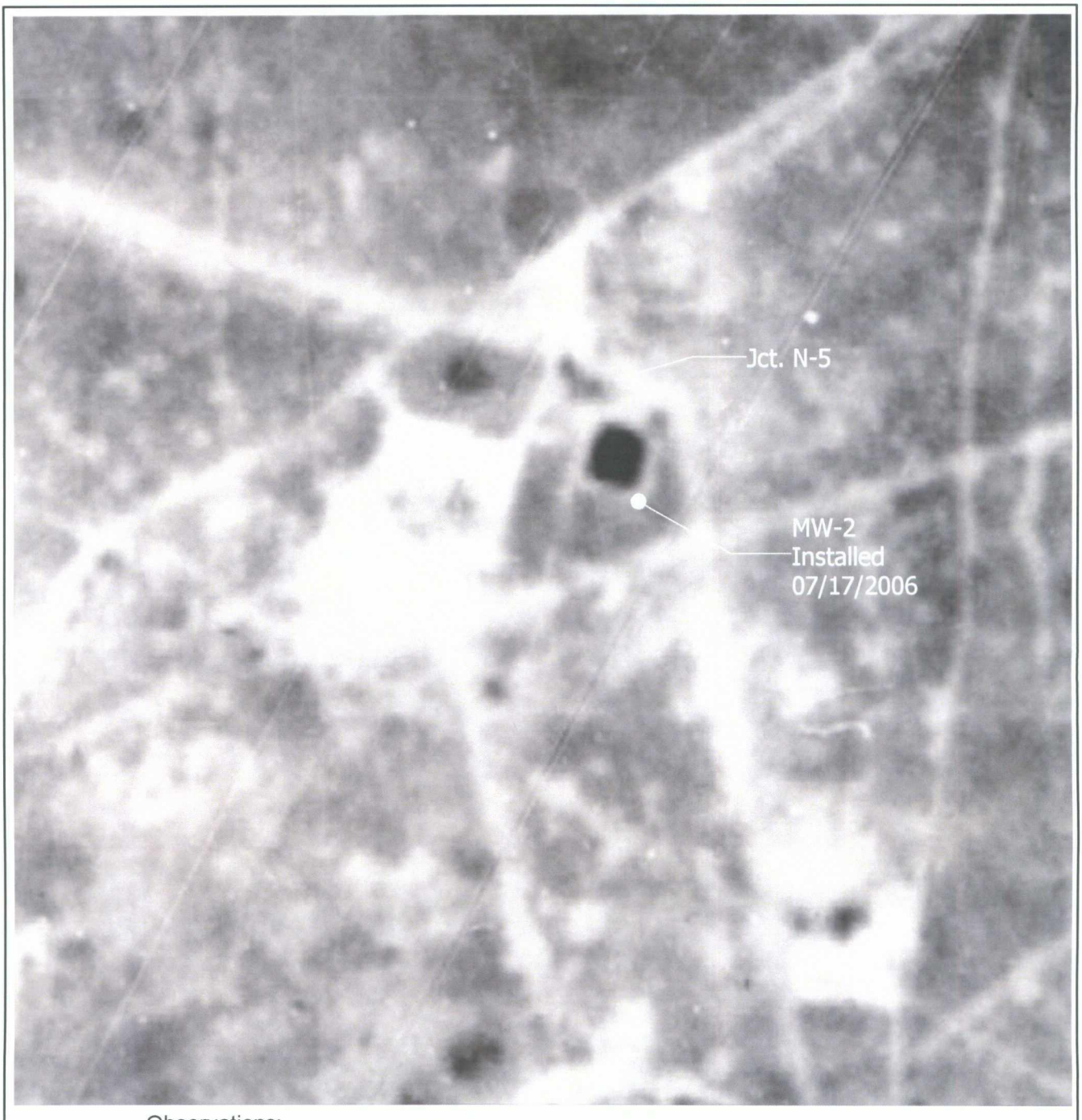
Anderson Prichard Oil Company tank battery in place with at least two tanks and dark-stained soil.

Large barren area at center is apparent and might be the location of where the original drilling pit for the H. M. Britt B #1 well was. The Britt B #1 was put into oil production by Anderson Prichard Oil Company in 1937 according to OCD well records. The well was approved for dual completion and commenced gas production in 1957 along with oil production.

Ownership of Britt B #1 changed from Anderson Prichard Oil Company to Union Texas Natural Gas Corp in 1961 and then to Union Texas Petroleum Corp in 1962. There are no OCD well records for Britt B #1 between 1962-1976.

Image Source: Agricultural Stabilization and Conservation Service (ASCS) at 1:20000 ft

TRIDENT ENVIRONMENTAL	EME Jct. N-5 Site (AP-66) T20S - R37E - Section 5 - Unit N **RICE** *Operating Company*	1949



Observations:
Union Texas Petroleum Corp tank battery in place
Britt B #1 oil & gas well is present (no OCD well records between 1962-1976)
First evidence of a large pit located southeast of tank battery and the N-5 junction box
Northwest-Southeast trending ROC pipeline along north side of tank battery and pit
According to ROC records the N-5 junction box was constructed in1959
Other non-ROC pipelines present (stressed vegetation)

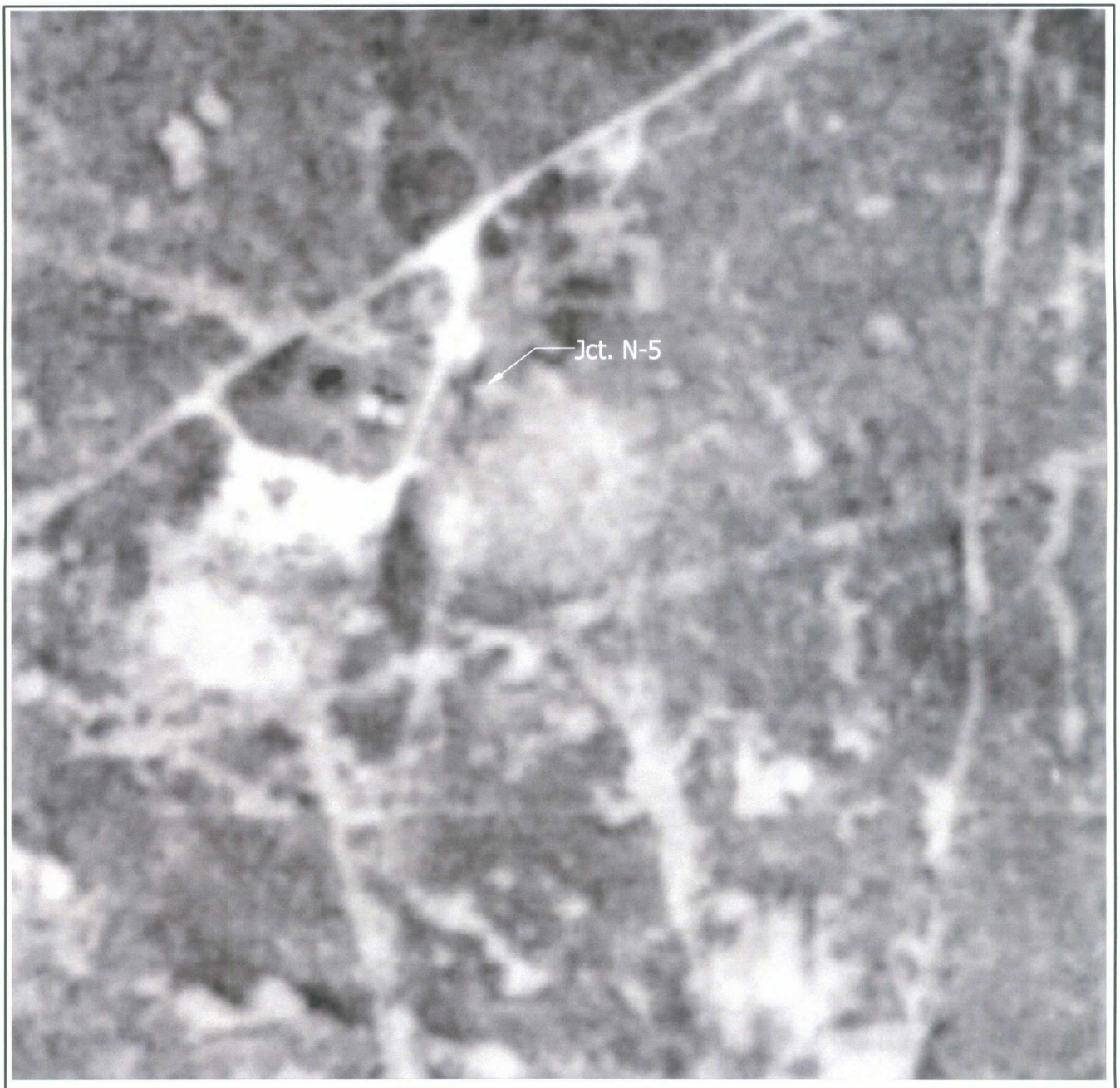
Aerial Viewpoint 15' Mosaic Hobbs SW at 1:48000ft

TRIDENT ENVIRONMENTAL	EME Jct. N-5 Site (AP-66) T20S - R37E - Section 5 - Unit N **RICE** *Operating Company*	1964

Observations:
Union Texas Petroleum Corp tank battery in place with four tanks.
Britt B #1 oil & gas well is present and active
Large pit located southeast of tank battery and the N-5 junction box is in use.
The future location of MW-2 is noted at the southeast edge of the pit.
Unknown structure between tank battery and large pit
Northwest-Southeast trending ROC pipeline along north side of tank battery and pit
Non-ROC pipelines present (stressed vegetation)

Image Source: Agricultural Stabilization and Conservation Service (ASCS) at 1:20000 ft

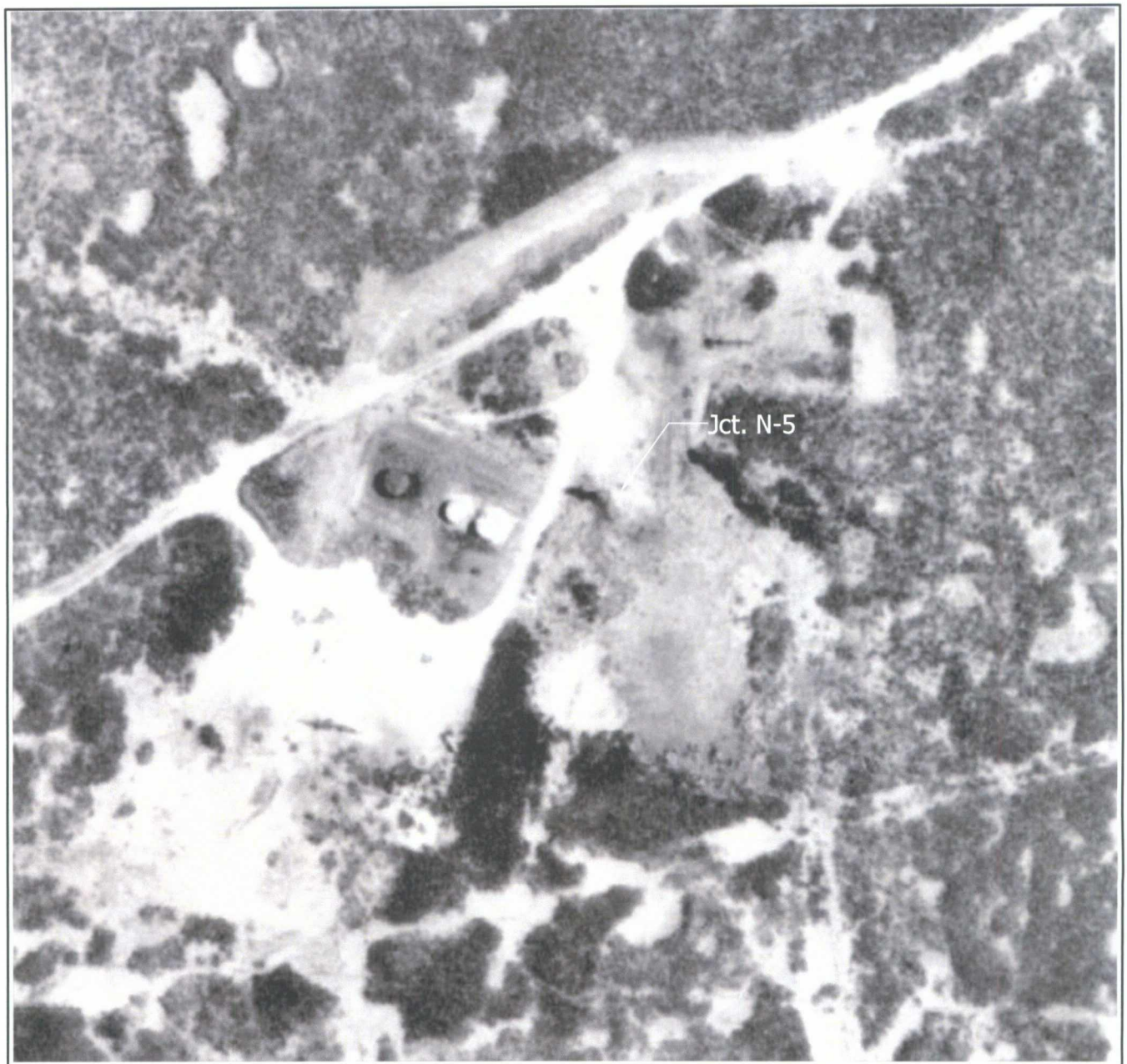
TRIDENT ENVIRONMENTAL	EME Jct. N-5 Site (AP-66) T20S - R37E - Section 5 - Unit N **RICE** *Operating Company*	1966



Observations:
Union Texas Petroleum Corp tank battery still in place with three tanks
Britt B #1 oil & gas well is present and active
Large pit located southeast of tank battery has been backfilled (stressed vegetation)
Non-ROC pipelines present (stressed vegetation)

Image Source: U.S. Geological Survey VDRZ at 1:80000 ft

TRIDENT ENVIRONMENTAL	EME Jct. N-5 Site (AP-66) T20S - R37E - Section 5 - Unit N **RICE** *Operating Company*	1975



Observations:
Union Texas Petroleum Corp tank battery in place with three tanks.
According to OCD well records the Britt B #1 oil & gas well was plugged in 1977
Several non-ROC pipelines present (stressed vegetation)

Image Source: U.S. Geological Survey VEOL at 1:12600 ft

TRIDENT ENVIRONMENTAL

EME Jct. N-5 Site (AP-66)
T20S - R37E - Section 5 - Unit N
RICE *Operating Company*

1978

Observations:
Union Texas Petroleum Corp tank battery removed sometime after 1978 (stressed vegetation).
Outline of large pit still evident (stressed vegetation).
Outline of Britt B #1 well site still evident (stressed vegetation).
Non-ROC pipeline with circular outline of spill evident (stressed vegetation).

Image Source: Google DigitalGlobe

TRIDENT ENVIRONMENTAL	EME Jct. N-5 Site (AP-66) T20S - R37E - Section 5 - Unit N **RICE** *Operating Company*	2003

ATTACHMNENT B

DIGITAL PHOTOGRAPHS

(JULY 2, 2008)

1: Southwest view showing plugged Britt B #1 well (foreground) ~140 ft NNW of the N-5 junction box (background, top-center).

2: View facing north in direction of Britt B #1 well (top-center) showing encrusted crude oil-impacted surface soil.

3: View facing northeast showing old crude-impacted surface soil at former tank battery (~120 ft west of N-5 junction box).

4: View facing southwest showing old crude-impacted surface soil at former tank battery (~ 60 ft west of N-5 junction box).

5: View facing northeast showing evidence of historic spill and stressed vegetation caused by non-ROC pipeline (~ 175 ft south of N-5 junction box).

6: View facing southwest showing evidence of historic spill and stressed vegetation caused by non-ROC pipeline (~ 150 ft south of N-5 junction box).

7: View facing northwest showing former pit area (ranging from 50 ft to 200 ft SSE of junction box) with MW-2 in foreground.

8: View facing southeast showing new N-5 junction box and former pit area in background (top-center) with MW-1 (left-center).

Gil Van Deventer

From: "Gil Van Deventer" <gilbertvandeventer@suddenlink.net>
"Hansen, Edward J., EMNRD" <edwardj.hansen@state.nm.us>
Cc: "Chris Williams" <chris.williams@state.nm.us>; "Haskell Conder" <hconder@riceswd.com>; "Marvin Burrows" <mburrows@riceswd.com>; "Wayne Price" <wayne.price@state.nm.us>
Sent: Wednesday, July 16, 2008 4:37 PM
Attach: Closure Request final N-5.pdf
Subject: Closure Request - EME Jct. N-5 Site (AP-66)

Attention: Edward Hansen, New Mexico Oil Conservation Division - Environmental Bureau

Subject: Closure Request

Site Name: EME Jct. N-5 Site (AP-66)

Site Location: T20S-R37E-Section 5, Unit Letter N, Lea County, New Mexico

Site Agent: RICE Operating Company

Hello Edward:

Attached is a closure request for the EME Jct. N-5 Site (AP-66). One hard copy and one copy on compact disk has been sent via USPS Certified Mail (# 7099 3400 0017 1737 1995) today. Upon receipt from Trident, ROC will also provide a copy to the NMOCD District 1 office in Hobbs.

We look forward to hearing from you or meet you for approval of this request. Please feel free to contact me at 432-638-8740, or Hack Conder at ROC (505-393-9174).

Thank you,
Gil

Gilbert J. Van Deventer, PG, REM
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