

1R - 428-67

APPROVALS

YEAR(S):

2009

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, January 08, 2009 9:40 AM
To: 'Hack Conder'
Cc: Price, Wayne, EMNRD; Johnson, Larry, EMNRD; 'Katie Lee'
Subject: Suspension of laboratory analyses for BTEX
Attachments: ROC_BTEX Summary.xls

Dear Mr. Conder:

Upon review of the requests for suspension of laboratory analyses for BTEX, dated December 16, 2008, the New Mexico Oil Conservation Division (OCD) hereby approves the suspension of laboratory analyses for BTEX at the specified groundwater monitoring wells on the attached list.

[The well at the Hobbs SWD O-5 site (1R428-69) needs one additional groundwater sampling event with BTEX analytical results indicating that the respective standards have been met. Please resubmit your request for this well to the OCD once the results are available.]

The above approval is based on either eight consecutive sampling events that indicate that the respective standards have been met or that the four initial sampling events have indicated that there has been no detection of BTEX. However, the OCD may require additional sampling on a case-by-case basis (e.g., increasing concentration trend or elevated concentrations of BTEX in the vadose zone). Therefore, future requests for suspension of laboratory analyses for BTEX must be submitted to the OCD on a case-by-case basis, which include a table of all soil and groundwater monitoring results.

Please be advised that this OCD approval does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

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

Edward J. Hansen
Hydrologist
Environmental Bureau

System	Site	NMOCD case #	Last Submission	MWs where BTEX is ND, # of Quarters	# wells to stop BTEX Analysis
BD	B-29	1R426-169	Status Report	MW1&2: BTEX 4Q	2
EME	M-5 SWD	1R424	Final Closure Report	1: BTEX 13Q, 2: BTEX 22Q	2
EME	K-33-1	1R0427-92	Stage 1 AP	1: BTEX 22Q, 2: BTEX 7Q, 3: BTEX 8Q, 4: BTEX 4Q	4
Hobbs	jct. E-33-1	1R428-67	Corrective Action Plan	BTEX: 10Q	1
Hobbs	O-5	1R428-69	Status Report	EX 7Q, BT 3Q	1
Hobbs	M-4 vent	1R428-76	CAP	BTEX 4Q	1
Hobbs	F-29 SWD	AP-64	Stage 1 & 2	2: BTEX 5Q, 3: BTEX 8Q, 4: BTEX 26Q, 5: BTEX 5Q	4
Vacuum	F-35 SWD	AP-59	AP Amendment Proposal	2: BTEX 10Q, 3D & 3S: BTEX 6Q	3
Vacuum	G-35 SWD	AP-59	AP Amendment Proposal	2: BTEX 10Q, 3D: BTEX 8Q, 3S: BTEX 7Q	3

Total Wells with Proposed BTEX Suspension

21

R. T. HICKS CONSULTANTS, LTD.

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December 16, 2008

Edward J. Hansen
NMOCD Environmental Bureau
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
Via E-mail and Hand Delivery

RECEIVED
DEC 16 2008
Environmental Bureau
Oil Conservation Division

RE: ROC Jct. E-33-1 NMOCD: 1R0428-67
Plans to discontinue lab analysis of Benzene, Toluene, Ethyl benzene, & Xylenes
Section 33, 18S, 38E, Unit E

Dear Mr. Hansen:

When Rice Operating Company observes three consecutive quarters of laboratory analysis showing any constituent of concern below detection limits, ROC will request from NMOCD a discontinuation of laboratory analysis for that constituent during quarterly sampling, unless evidence suggests that conditions have changed.

In the monitoring well at the above referenced site, laboratory analyses for Benzene, Toluene, Ethyl benzene and Xylenes have been below detection limits for the last 10 quarters from May 2006 to the most recent sampling event in October 2008. As such, ROC requests discontinuation of laboratory analysis for these constituents beginning in our next quarter of data collection.

The attached table presents all ground water data for the site. If you have questions, please contact us or ROC.

Sincerely,
R.T. Hicks Consultants, Ltd.



Katie Lee
Project Scientist

Copy: Rice Operating Company

ROC Hobbs Jct. E-33-1

MW	Sample Date	Cl	TDS	Benzene	Toluene	Ethyl Benzene (mg/L)	Total Xylenes	Sulfate	Comments
1	5/17/2006	142	678	<0.001	<0.001	<0.001	<0.001	93.4	Silt to Clear/No Odor
1	10/31/2006	164	620	<0.001	<0.001	<0.001	<0.001	96.2	Silt and Sand Present Clear
1	2/22/2007	222	678	<0.001	<0.001	<0.001	<0.001	112	Silt to sand present Clear No odor
1	5/1/2008	116	677	<0.002	<0.002	<0.002	<0.006	178	Silt to sand to clear No odor
1	4/25/2007	195	684	<0.001	<0.001	<0.001	<0.001	101	No Odor/ Silt and Sand Present clear
1	7/30/2007	215	754	<0.001	<0.001	<0.001	<0.001	115	Silt and Sand Present Clear No Odor
1	12/19/2007	308	933	<0.002	<0.002	<0.002	<0.006	174	Clear/silt and sand present No odor
1	2/8/2008	368	1120	<0.002	<0.002	<0.002	<0.004	176	Clear with silt and sand present No odor
1	7/25/2008	196	785	<0.002	<0.002	<0.002	<0.006	100	Silt to sand to clear No odor
1	10/29/2008	344	1240	<0.001	<0.001	<0.001	<0.003	170	Silt and sand present Clear No odor