

AP - 64

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.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266-0745

December 16, 2008

RECEIVED

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

DEC 16 2008
Environmental Bureau
Oil Conservation Division

RE: ROC Hobbs F-29 SWD NMOCD: AP-64
Plans to discontinue lab analysis of Benzene, Toluene, Ethyl benzene, & Xylenes
Section 29, 18S, 38E, Unit F

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 3 quarters as follows:

MW- 2	since October 2007
MW-3	since February 2007
MW-4	since May 2002
MW-5	since October 2007

Ground water at all of these wells maintained below detection limits for these analytes from the dates above to the most recent sampling event in November 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

F-29 SWD GW data

ROC Hobbs F-29 SWD

MW	Sample Date	Cl	TDS	Benzene	Toluene	Ethyl Benzene	Total Xylenes	Sulfate
		(mg/L)						
2	3/21/2000	2564	6660	XXX	XXX	XXX	XXX	XXX
2	7/10/2000	1829	3470	<0.002	<0.002	<0.002	<0.006	XXX
2	9/27/2000	1748	3032	<0.002	<0.002	<0.002	<0.006	XXX
2	12/12/2000	1027	2586	<0.002	<0.002	<0.002	<0.006	XXX
2	1/4/2001	308	1114	XXX	XXX	XXX	XXX	XXX
2	3/16/2001	396	1373	XXX	XXX	XXX	XXX	XXX
2	3/23/2001	368	1312	XXX	XXX	XXX	XXX	XXX
2	5/7/2001	365	1272	XXX	XXX	XXX	XXX	XXX
2	6/8/2001	513	1796	XXX	XXX	XXX	XXX	XXX
2	8/14/2001	340	1385	XXX	XXX	XXX	XXX	XXX
2	12/29/2001	XXX	XXX	XXX	XXX	XXX	XXX	XXX
2	1/4/2002	308	1114	XXX	XXX	XXX	XXX	XXX
2	6/6/2002	221	XXX	<0.001	<0.001	<0.001	<0.001	135
2	8/14/2002	186	806	<0.001	<0.001	<0.001	<0.001	144
2	12/11/2002	172	738	<0.002	<0.002	<0.002	<0.006	106
2	3/21/2003	230	XXX	<0.001	<0.001	<0.001	<0.001	140
2	5/28/2003	257	804	<0.001	<0.001	<0.001	<0.001	138
2	9/22/2003	151	700	<0.001	<0.001	<0.001	<0.001	173
2	12/18/2003	208	815	<0.002	0.003	<0.002	0.014	71
2	3/15/2004	186	607	<0.001	<0.001	<0.001	<0.001	103
2	5/27/2004	213	830	<0.001	<0.001	<0.001	<0.001	138
2	9/8/2004	248	946	0.00464	0.000412	0.000979	0.001199	129
2	11/23/2004	139	888	0.00448	<0.001	<0.001	0.000714	125
2	3/22/2005	214	914	<0.001	<0.001	<0.001	<0.001	196
2	5/18/2005	223	930	<0.001	<0.001	<0.001	<0.001	131
2	8/8/2005	210	799	<0.001	<0.001	<0.001	<0.001	130
2	10/31/2005	185	762	<0.001	<0.001	<0.001	<0.001	100
2	1/30/2006	198	904	<0.001	<0.001	<0.001	<0.001	89.4
2	5/1/2006	212	904	<0.001	<0.001	<0.001	<0.001	91.3
2	10/16/2006	258	1040	<0.001	j[0.000790]	j[0.000356]	j[0.000940]	116
2	2/5/2007	299	908	<0.001	<0.001	<0.001	<0.001	112
2	5/16/2007	236	898	<0.001	<0.001	<0.001	<0.001	102
2	7/31/2007	272	1040	<0.001	<0.001	<0.001	0.0033	41.9
2	10/18/2007	292	1047	<0.001	<0.001	<0.001	<0.003	113
2	2/18/2008	300	1040	<0.002	<0.002	<0.002	<0.006	132
2	4/25/2008	320	1070	<0.002	<0.002	<0.002	<0.006	185
2	7/24/2008	172	773	<0.001	<0.001	<0.001	<0.003	104
2	11/12/2008	296	1130	<0.001	<0.001	<0.001	<0.003	131

F-29 SWD GW data

MW	Sample Date	Cl	TDS	Benzene	Toluene	Ethyl Benzene	Total Xylenes	Sulfate
		(mg/L)						
3	1/4/2001	136	1013	XXX	XXX	XXX	XXX	XXX
3	12/29/2001	XXX	XXX	XXX	XXX	XXX	XXX	XXX
3	1/4/2002	136	1013	XXX	XXX	XXX	XXX	XXX
3	5/24/2002	137	917	<0.001	<0.001	<0.001	<0.001	158
3	8/14/2002	151	998	<0.001	<0.001	<0.001	<0.001	284
3	12/11/2002	136	1069	0.005	<0.002	<0.002	<0.006	201
3	3/21/2003	133	XXX	<0.001	<0.001	<0.001	<0.001	266
3	5/28/2003	301	1120	<0.001	<0.001	<0.001	<0.001	240
3	9/22/2003	120	881	<0.001	<0.001	<0.001	<0.001	238
3	12/18/2004	124	852	<0.002	<0.002	<0.002	<0.006	73
3	3/15/2004	115	1140	<0.001	<0.001	<0.001	<0.001	248
3	5/27/2004	111	810	<0.001	<0.001	<0.001	<0.001	171
3	9/8/2004	230	937	<0.001	<0.001	<0.001	<0.001	186
3	11/23/2004	115	925	<0.001	<0.001	<0.001	<0.001	183
3	3/22/2005	162	796	<0.001	<0.001	<0.001	<0.001	126
3	5/18/2005	272	1050	<0.001	<0.001	<0.001	<0.001	92
3	8/8/2005	203	945	<0.001	<0.001	<0.001	<0.001	122
3	10/31/2005	113	732	<0.001	<0.001	<0.001	<0.001	116
3	1/30/2006	97.3	650	<0.001	<0.001	<0.001	j[0.000562]	120
3	5/1/2006	85.3	704	<0.001	<0.001	<0.001	<0.001	111
3	10/16/2006	88.9	616	<0.001	j[0.000950]	j[0.000404]	0.00105	135
3	2/5/2007	98.3	572	<0.001	<0.001	<0.001	<0.001	128
3	4/25/2008	244	918	<0.002	<0.002	<0.002	<0.006	172
3	5/16/2007	90.6	542	<0.001	<0.001	<0.001	<0.001	111
3	7/31/2007	105	590	<0.001	<0.001	<0.001	<0.002	76.5
3	10/18/2007	100	611	<0.001	<0.001	<0.001	<0.003	120
3	2/18/2008	104	607	<0.002	<0.002	<0.002	<0.006	144
3	7/24/2008	80	584	<0.001	<0.001	<0.001	<0.003	104
3	11/12/2008	104	708	<0.001	<0.001	<0.001	<0.003	143

F-29 SWD GW data

MW	Sample Date	Cl	TDS	Benzene	Toluene	Ethyl Benzene	Total Xylenes	Sulfate
		(mg/L)						
4	1/4/2001	464	1781	XXX	XXX	XXX	XXX	XXX
4	12/29/2001	XXX	XXX	XXX	XXX	XXX	XXX	XXX
4	1/4/2002	464	1781	XXX	XXX	XXX	XXX	XXX
4	5/24/2002	461	1520	<0.001	<0.001	<0.001	<0.001	286
4	8/14/2002	416	1660	<0.001	<0.001	<0.001	<0.001	303
4	12/11/2002	336	1302	0.003	<0.002	<0.002	<0.006	170
4	3/21/2003	346	XXX	<0.001	<0.001	<0.001	<0.001	289
4	5/28/2003	124	742	<0.001	<0.001	<0.001	<0.001	269
4	9/22/2003	425	1640	<0.001	<0.001	<0.001	<0.001	271
4	12/18/2003	660	1902	<0.002	<0.002	<0.002	<0.006	123
4	3/15/2004	452	1510	<0.001	<0.001	<0.001	<0.001	290
4	5/27/2004	461	1600	<0.001	<0.001	<0.001	<0.001	174
4	9/8/2004	372	1300	<0.001	<0.001	<0.001	<0.001	260
4	11/23/2004	401	1550	<0.001	<0.001	<0.001	<0.001	217
4	3/22/2005	392	1220	<0.001	<0.001	<0.001	<0.001	196
4	5/18/2005	336	1230	<0.001	<0.001	<0.001	<0.001	169
4	8/8/2005	370	1230	<0.001	<0.001	<0.001	<0.001	171
4	10/31/2005	411	1560	<0.001	J[0.000774]	J[0.000385]	J[0.000842]	156
4	1/30/2006	523	1780	<0.001	<0.001	j[0.000332]	j[0.001064]	182
4	5/1/2006	501	1800	<0.001	<0.001	<0.001	<0.001	144
4	10/16/2006	683	2570	<0.001	<0.001	<0.001	<0.001	284
4	2/5/2007	653	1750	<0.001	<0.001	<0.001	<0.001	289
4R	4/25/2008	670	1960	<0.002	<0.002	<0.002	<0.006	304
4	6/1/2007	668	2060	<0.001	<0.001	<0.001	<0.001	254
4	7/31/2007	548	2380	<0.001	<0.001	<0.001	<0.002	248
4	10/18/2007	440	1394	<0.001	<0.001	<0.001	<0.003	211
4	2/18/2008	508	1680	<0.002	<0.002	<0.002	<0.002	186
4R	7/24/2008	590	1950	<0.001	<0.001	<0.001	<0.003	350
4R	11/12/2008	476	1570	<0.001	<0.001	<0.001	<0.003	289
MW	Sample Date	Cl	TDS	Benzene	Toluene	Ethyl Benzene	Total Xylenes	Sulfate
		(mg/L)						
5	10/18/2007	268	983	<0.001	<0.001	<0.001	<0.003	138
5	2/18/2008	316	1110	<0.002	<0.002	<0.002	<0.006	168
5	4/25/2008	484	1530	<0.002	<0.002	<0.002	<0.006	262
5	7/24/2008	356	1250	<0.001	<0.001	<0.001	<0.003	172
5	11/12/2008	324	1190	<0.001	<0.001	<0.001	<0.003	186