

AP - 66

GENERAL CORRESPONDENCE

YEAR(S):
2009

CERTIFIED MAIL

RETURN RECEIPT NO. 7099 3400 00100073719403 P11 1 12



February 20, 2009

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

**RE: REQUEST FOR SUSPENSION OF BTEX SAMPLING
EME JCT. N-5 SITE (AP-66)
T20S, R37E, SECTION 5, UNIT LETTER N
LEA COUNTY, NEW MEXICO**

Mr. Jones:

On behalf of Rice Operating Company (ROC), we would like to request approval to suspend collection of groundwater samples for the analysis of benzene, toluene, ethylbenzene, and xylenes (BTEX) at the EME Jct. N-5 site (AP-66). The constituents of concern at this site are limited to chloride and total dissolved solids (TDS) which will continue to be monitored.

This request for suspension of BTEX sampling is based on ten or more consecutive sampling events that indicate the Water Quality Control Commission (WQCC) standards have been met for these constituents in all three monitoring wells at this site.

A table listing the historical groundwater analytical results at each monitoring well is attached to demonstrate that the groundwater is not impacted by hydrocarbons. In addition, the soil boring logs are included to document conditions within the vadose zone to support this request. No boring log exists for monitoring well MW-1; however, the soil boring log for boring B-5 is the closest to that location.

ROC is the service provider (agent) for the EME SWD System and has no ownership of any portion of pipeline, well, or facility. The EME SWD System is owned by a consortium of oil producers, System Partners, who provide all operating capital on a percentage ownership/usage basis.

Thank you for your consideration concerning this request and we look forward to hearing from you prior to the next scheduled sampling event. If you have any questions, please contact me at (432) 638-8740 or Hack Conder at (575) 393-9174.

Sincerely,

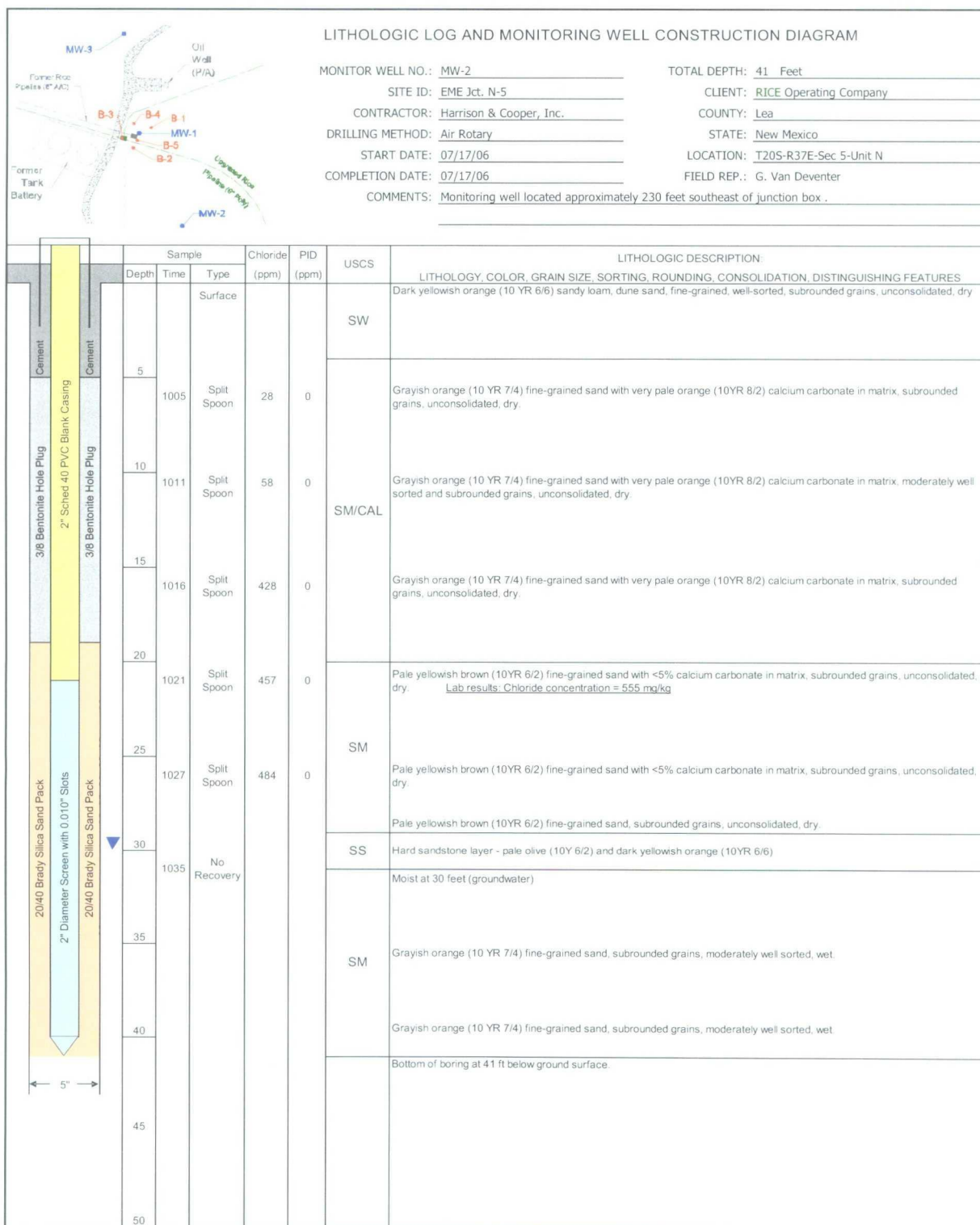

Gilbert J. Van Deventer, PG, REM

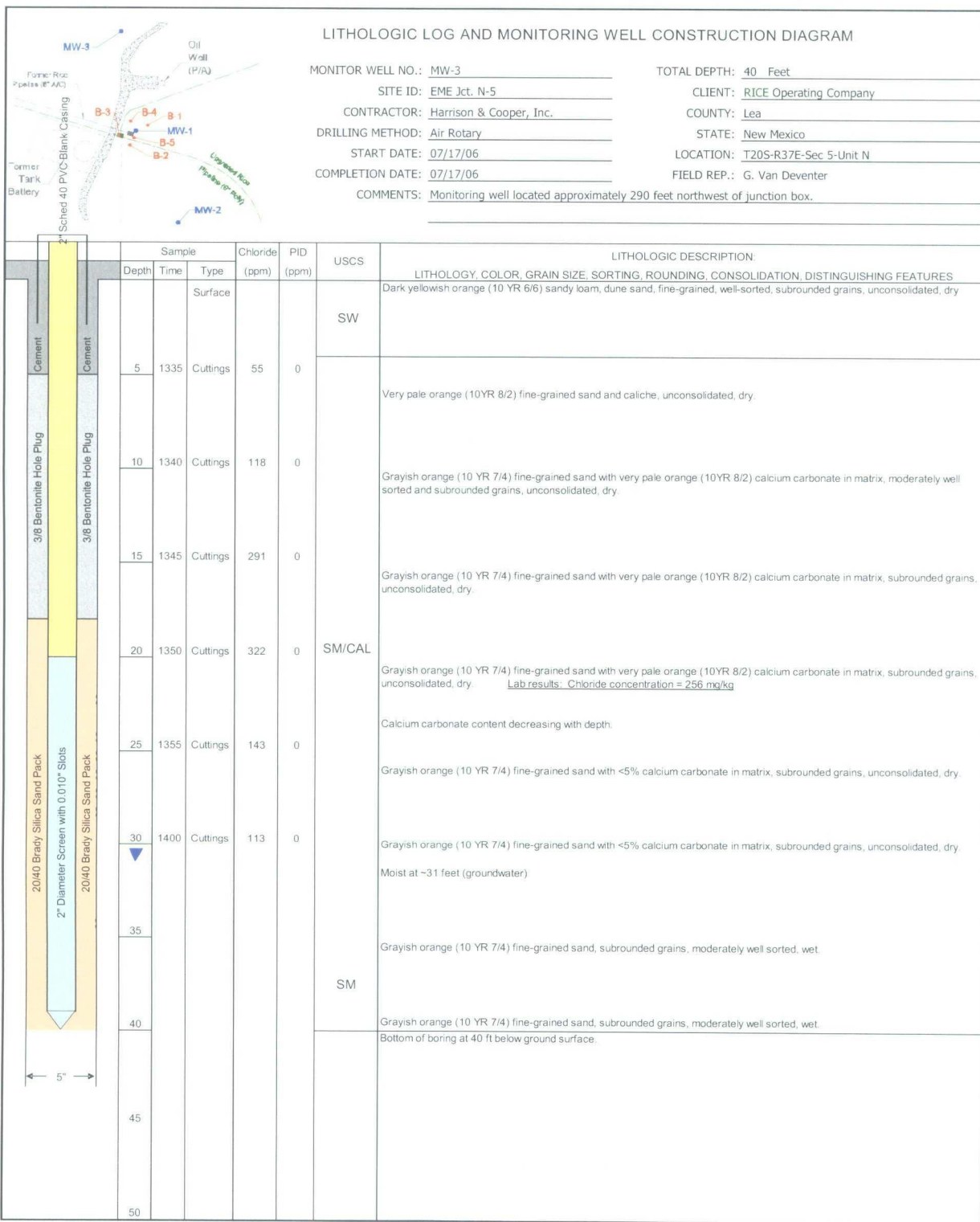
cc: HC, MB

enclosures: data table, lithologic logs

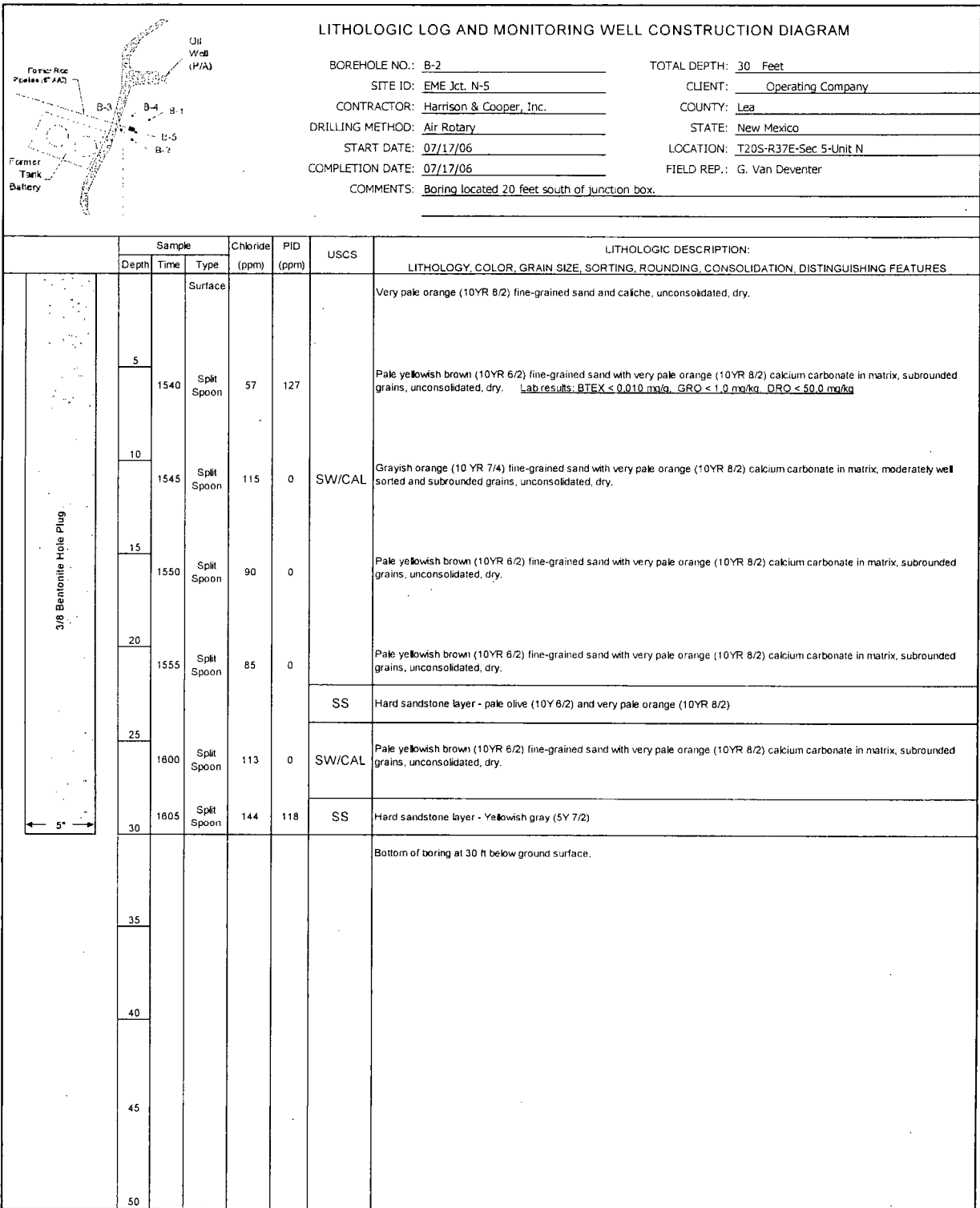
Table 1
Summary of Groundwater Sampling Results

Monitoring Well	Sample Date	Depth to Groundwater (feet BTOC)	Water Table Elevation (feet AMSL)	Chloride (mg/L)	TDS (mg/L)	Benzene (mg/L)	Toluene (mg/L)	Ethylbenzene (mg/L)	Xylene (mg/L)
MW-1	01/10/02	35.50	3523.85	1,160	2,652	<0.002	<0.002	<0.006	<0.006
	05/13/02	37.47	3521.88	993	2,520	<0.001	0.002	0.003	0.009
	08/12/02	37.75	3521.60	939	2,700	<0.001	<0.001	<0.001	0.001
	11/04/02	37.90	3521.45	1,200	3,083	<0.002	<0.002	<0.002	<0.006
	03/14/03	37.78	3521.57	1,050	2,310	<0.001	0.002	0.004	0.011
	05/29/03	38.00	3521.35	1,130	3,230	<0.001	0.001	0.004	0.01
	08/22/03	38.42	3520.93	1,200	2,930	---	---	---	---
	11/20/03	38.63	3520.72	1,150	3,200	<0.001	0.002	0.003	0.012
	02/20/04	38.50	3520.85	1,180	2,575	<0.002	<0.002	<0.002	<0.006
	05/26/04	37.80	3521.55	1,000	2,583	<0.002	0.005	0.005	0.010
	09/02/04	37.94	3521.41	1,150	3,170	<0.001	0.001	0.002	0.003
	12/21/04	35.12	3524.23	1,330	3,990	<0.001	<0.001	<0.001	<0.001
	01/26/05	34.03	3525.32	1,810	4,280	<0.001	<0.001	0.001	0.001
	02/08/05	33.79	3525.56	1,640	4,280	<0.001	<0.001	0.002	0.001
	05/02/05	34.50	3524.85	2,140	5,680	<0.001	<0.001	0.003	0.002
	08/11/05	33.39	3525.96	1,860	4,480	<0.001	<0.001	<0.001	<0.001
	11/28/05	32.90	3526.45	1,430	3,180	<0.001	<0.001	<0.001	<0.001
	02/21/06	32.72	3526.63	1,340	3,550	<0.001	<0.001	<0.001	<0.001
	05/17/06	32.83	3526.52	1,350	2,780	<0.001	<0.001	<0.001	<0.001
	08/21/06	33.45	3525.90	1,070	2,580	<0.001	0.001	0.001	0.004
	11/07/06	32.35	3527.00	841	1,860	0.002	<0.001	0.001	0.001
	03/06/07	31.67	3527.68	757	1,720	<0.001	0.001	0.001	<0.001
	06/07/07	31.57	3527.78	731	1,990	<0.001	0.001	0.001	<0.001
	08/27/07	32.12	3527.23	780	2,183	<0.002	<0.002	<0.002	<0.006
	11/09/07	31.84	3527.51	724	1,707	< 0.001	< 0.001	< 0.001	< 0.003
	02/21/08	31.81	3527.54	680	1,810	< 0.001	< 0.001	< 0.001	< 0.003
	05/15/08	31.92	3527.43	680	1,660	<0.002	<0.002	<0.002	<0.006
	08/20/08	32.65	3526.70	640	1,800	< 0.001	< 0.001	< 0.001	< 0.003
	11/19/08	32.79	3526.56	630	1,630	<0.001	<0.001	<0.001	<0.003
MW-2	08/21/06	33.04	3525.70	1,860	3,800	<0.001	<0.001	<0.001	<0.001
	11/07/06	32.06	3526.68	1,710	3,310	<0.001	<0.001	<0.001	<0.001
	03/06/07	31.32	3527.42	1,800	3,940	<0.001	<0.001	<0.001	<0.001
	06/07/07	31.22	3527.52	1,590	4,590	<0.001	<0.001	<0.001	<0.001
	08/27/07	31.75	3526.99	1,500	4,441	<0.002	<0.002	<0.002	<0.006
	11/09/07	31.45	3527.29	1,440	2,962	< 0.001	< 0.001	< 0.001	< 0.003
	02/21/08	31.42	3527.32	1,380	3,060	< 0.001	< 0.001	< 0.001	< 0.003
	05/15/08	31.55	3527.19	1,220	2,930	<0.002	<0.002	<0.002	<0.006
	08/20/08	32.30	3526.44	1,080	2,970	< 0.001	< 0.001	< 0.001	< 0.003
	11/19/08	32.41	3526.33	1,080	2,600	<0.001	<0.001	<0.001	<0.003
MW-3	08/21/06	31.86	3526.10	553	1,630	<0.001	<0.001	<0.001	<0.001
	11/07/06	30.68	3527.28	491	1,270	<0.001	<0.001	<0.001	<0.001
	03/06/07	30.02	3527.94	333	1,220	<0.001	<0.001	<0.001	<0.001
	06/07/07	29.93	3528.03	425	1,340	<0.001	<0.001	<0.001	<0.001
	08/27/07	30.50	3527.46	440	1,379	<0.002	<0.002	<0.002	<0.006
	11/09/07	30.33	3527.63	448	1,296	< 0.001	< 0.001	< 0.001	< 0.003
	02/21/08	30.30	3527.66	444	1,280	< 0.001	< 0.001	< 0.001	< 0.003
	05/15/08	30.43	3527.53	444	1,350	<0.002	<0.002	<0.002	<0.006
	08/20/08	31.14	3526.82	424	1,460	< 0.001	< 0.001	< 0.001	< 0.003
	11/19/08	31.23	3526.73	420	1,350	<0.001	<0.001	<0.001	<0.003
WQCC Standards				250	1,000	0.01	0.75	0.75	0.62





LITHOLOGIC LOG AND MONITORING WELL CONSTRUCTION DIAGRAM											
		BOREHOLE NO.: <u>B-1</u>		TOTAL DEPTH: <u>30</u> Feet							
		SITE ID: <u>EME Jct. N-5</u>		CLIENT: <u>Operating Company</u>							
		CONTRACTOR: <u>Harrison & Cooper, Inc.</u>		COUNTY: <u>Lea</u>							
		DRILLING METHOD: <u>Air Rotary</u>		STATE: <u>New Mexico</u>							
		START DATE: <u>07/17/06</u>		LOCATION: <u>T205-R37E-Sec 5-Unit N</u>							
		COMPLETION DATE: <u>07/17/06</u>		FIELD REP.: <u>G. Van Deventer</u>							
COMMENTS: <u>Boring located 26 feet northwest of junction box.</u>											
LITHOLOGIC LOG AND MONITORING WELL CONSTRUCTION DIAGRAM											
		Sample		Chloride (ppm)	PID (ppm)	USCS	LITHOLOGIC DESCRIPTION:				
		Depth	Time				Type	LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES			
3/8 Bentonite Hole Plug 5"				Surface			SW/CAL	Very pale orange (10YR 8/2) fine-grained sand and caliche, unconsolidated, dry.			
		5							Very pale orange (10YR 8/2) fine-grained sand and caliche, unconsolidated, dry.		
		10	1454	Split Spoon	119	0					
		15	1455	Split Spoon	87	0		Grayish orange (10YR 7/4) fine-grained sand with very pale orange (10YR 8/2) calcium carbonate in matrix, moderately well sorted and subrounded grains, unconsolidated, dry.			
		20	1458	Split Spoon	88	0		Pale yellowish brown (10YR 6/2) fine-grained sand with very pale orange (10YR 8/2) calcium carbonate in matrix, subrounded grains, unconsolidated, dry.			
		25	1503	Split Spoon	60	0		Pale yellowish brown (10YR 6/2) fine-grained sand with very pale orange (10YR 8/2) calcium carbonate in matrix, subrounded grains, unconsolidated, dry.			
		30	1505	Split Spoon	58	0		Hard sandstone layer - pale olive (10Y 6/2) and very pale orange (10YR 8/2)			
		35	1520	Split Spoon	343	0		Hard sandstone layer - pale olive (10Y 6/2) and dark yellowish orange (10YR 6/6)			
		40									
		45									
		50					Bottom of boring at 30 ft below ground surface.				
		55									
		60									



LITHOLOGIC LOG AND MONITORING WELL CONSTRUCTION DIAGRAM																																																																																								
			BOREHOLE NO.: <u>B-3</u>		TOTAL DEPTH: <u>30</u> Feet																																																																																			
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LITHOLOGIC LOG AND MONITORING WELL CONSTRUCTION DIAGRAM

BOREHOLE NO.: <u>B-4</u>	TOTAL DEPTH: <u>30 Feet</u>
SITE ID: <u>EME Jct. N-5</u>	CLIENT: <u>Operating Company</u>
CONTRACTOR: <u>Harrison & Cooper, Inc.</u>	COUNTY: <u>Lea</u>
DRILLING METHOD: <u>Air Rotary</u>	STATE: <u>New Mexico</u>
START DATE: <u>07/18/06</u>	LOCATION: <u>T205-R37E-Sec 5-Unit N</u>
COMPLETION DATE: <u>07/18/06</u>	FIELD REP.: <u>G. Van Deventer</u>
COMMENTS: <u>Boring located 20 feet north of junction box.</u>	

TOTAL DEPTH: 30 Feet

CLIENT: Operating Company

COUNTY: Lea

STATE: New Mexico

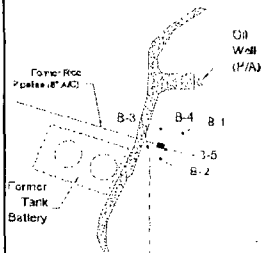
LOCATION: T20S-R37E-Sec 5-Unit N

FIELD REP.: G. Van Deventer

COMMENTS: Boring located 20 feet north of junction box.

		Sample			Chloride (ppm)	PID (ppm)	USCS	LITHOLOGIC DESCRIPTION:
		Depth	Time	Type				LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
3/8 Bentonite Hole Plug				Surface				Yellowish gray (5YR 7/2) fine-grained sand and caliche, moderately well sorted and subrounded grains, unconsolidated, dry.
	5							
		0727	Split Spoon	89	0			Yellowish gray (5YR 7/2) fine-grained sand and caliche, moderately well sorted and subrounded grains, unconsolidated, dry.
	10							
		0730	Split Spoon	404	0	SW/CAL		Grayish orange (10 YR 7/4) fine-grained sand with very pale orange (10YR 8/2) calcium carbonate in matrix, moderately well sorted and subrounded grains, unconsolidated, dry.
	15							
		0735	Split Spoon	334	17			Pale yellowish brown (10YR 6/2) fine-grained sand with very pale orange (10YR 8/2) calcium carbonate in matrix, subrounded grains, unconsolidated, dry. <u>Lab results: Chloride concentration = 457 mg/kg</u>
	20							
		0740	Split Spoon	143	0			Pale yellowish brown (10YR 6/2) fine-grained sand with very pale orange (10YR 8/2) calcium carbonate in matrix, subrounded grains, unconsolidated, dry.
	25					SS		Hard sandstone layer - pale olive (10Y 6/2) and very pale orange (10YR 8/2)
		0750	Split Spoon	115	11	SW/CAL		Pale yellowish brown (10YR 6/2) fine-grained sand with very pale orange (10YR 8/2) calcium carbonate in matrix, subrounded grains, unconsolidated, dry.
	30							
	0754	Split Spoon	86	17	SS		Hard sandstone layer - Yellowish gray (5Y 7/2)	
Bottom of boring at 30 ft below ground surface.								
	35							
	40							
	45							
	50							

LITHOLOGIC LOG AND MONITORING WELL CONSTRUCTION DIAGRAM



BOREHOLE NO.: B-5

TOTAL DEPTH: 30 Feet

SITE ID: EME Jct. N-5

CLIENT: Operating Company

CONTRACTOR: Harrison & Cooper, Inc.

COUNTY: Lea

DRILLING METHOD: Air Rotary

STATE: New Mexico

START DATE: 05/29/07

LOCATION: T205-R37E-Sec 5-Unit N

COMPLETION DATE: 05/29/07

FIELD REP.: G. Van Deventer

COMMENTS: Boring located immediately adjacent to (< 3 ft) southeast corner of junction box.

N 32° 35.78', W 103° 16.53'

Depth	Sample		Chloride (ppm)	PID (ppm)	USCS	LITHOLOGIC DESCRIPTION: LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
	Time	Type				
5	0844	Split Spoon	668	0	SW	Dune sand, fine- to medium-grained, pale yellowish brown (10YR 6/2), well sorted, subrounded grains, unconsolidated, dry.
10	0847	Split Spoon	181	147	SW	Dune sand, fine- to medium-grained, pale yellowish brown (10YR 6/2), well sorted, subrounded grains, unconsolidated, dry.
15	0850	Split Spoon	232	142	SW/ CAL	Dune sand, fine-grained, pale yellowish brown (10YR 6/2), well sorted, subrounded grains, unconsolidated, dry.
20	0909	Split Spoon	198	208	SW	Dune sand, fine-grained, pale yellowish brown (10YR 6/2), well sorted, subrounded grains, unconsolidated, dry.
25	0916	Split Spoon	182	203	SW/ SS	Dune sand, fine-grained, pale yellowish brown (10YR 6/2), well sorted, subrounded grains, unconsolidated, dry.
30	0924	Split Spoon	175		SW	Dune sand, fine-grained, pale yellowish brown (10YR 6/2), well sorted, subrounded grains, unconsolidated, dry.
35						
40						
45						
50						

Bottom of boring at 30 ft below ground surface.

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; 'Gil Van Deventer'
Subject: Request for Closure of the Amended Stage 2 Abatement Plan (AP-66) further delineation

RE: Request for Closure of the Amended Stage 2 Abatement Plan (AP-66) further delineation for the Rice Operating Company's EME SWD Jct. N-5 Site Unit Letter N, Section 5, T20S, R37E, Lea County, New Mexico

Dear Mr. Conder:

The New Mexico Oil Conservation Division (OCD) has received the Request for Closure of the Amended Stage 2 Abatement Plan (AP-66) for the EME Jct. N-5 Site, dated July 16, 2008, and has conducted a review of the Plan. The Request, submitted for the above-referenced site, indicates that Rice Operating Company (ROC) has not met the requirements of OCD Part 30 (formerly, Rule 19) for termination. Therefore, the OCD hereby cannot approve the Request for Closure for above-referenced site, dated July 16, 2008, in accordance with 19.15.30 NMAC. The OCD recommends that ROC perform short-term (at least 60 days) aggressive pumping at groundwater monitoring well MW-2 at the site to further delineate the release.

Please submit a report with the results of the delineation to the OCD within 90 days for review.

ROC must continue to perform groundwater monitoring at the site.

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

Edward J. Hansen
Hydrologist
Environmental Bureau