

AP - 48

**APPROVALS**

**YEAR(S):**

2009

**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Friday, January 09, 2009 3:03 PM  
**To:** 'Hack Conder'  
**Cc:** Price, Wayne, EMNRD; Johnson, Larry, EMNRD; 'Timothy.Reed@tetrattech.com'; 'kjones@riceswd.com'  
**Subject:** FW: ROC Stage 1/Stage 2 Abatement Plan (AP-48) Justis Jct. L-1 Site public notice draft - Administratively Complete  
**Attachments:** Justis L-1 Stage 1-Stage 2 Abatement Plan Public Notice.pdf

**RE: Stage 1 / Stage 2 Abatement Plan (AP-48) Administratively Complete  
for the Rice Operating Company's  
Justis Jct. L-1 Site  
Unit Letter L, Section 1, T25S, R37E, Lea County, New Mexico**

Dear Mr. Conder:

The New Mexico Oil Conservation Division (OCD) has received the Stage / Stage 2 Abatement Plan for the Rice Operating Company's (ROC) Justis Jct. L-1 Site, dated January 12, 2007, and has conducted a review of the Abatement Plan. The Plan, submitted for the above-referenced site, indicates that ROC has met the requirements of OCD Part 30 (formerly, Rule 19) for a Stage 1 / Stage 2 Abatement Plan. Therefore, the OCD hereby deems administratively complete the Stage 1 / Stage 2 Abatement Plan (AP-46) for the above-referenced site, dated May 6, 2008, in accordance with 19.15.30.15 NMAC.

Also, the OCD hereby conditionally approves the Public Notice for the Stage 1 / Stage 2 Abatement Plan (AP-46) as submitted (see attached) for the above-referenced Abatement Plan:

ROC must submit proof of public notice to demonstrate compliance with 19.15.30.15 NMAC to the OCD within 45 days.

Please be advised that OCD approval of this Public Notice and Administrative Completeness 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

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**From:** Katie Jones [mailto:kjones@riceswd.com]  
**Sent:** Friday, January 09, 2009 1:56 PM  
**To:** Hansen, Edward J., EMNRD  
**Cc:** Timothy.Reed@tetrattech.com; Hack Conder  
**Subject:** ROC Stage 1/Stage 2 Abatement Plan (AP-48) public notice draft

Mr. Hansen:

Attached is the proposed Stage 1/Stage 2 Abatement Plan Public Notice for the Rice Operating Company, Justis Jct. L-1 (AP-48) for your approval. Please advise if you have any comments or require any additional information.

Thank you,

Katie Jones  
Environmental Engineering Assistant  
*Rice Operating Company*

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This inbound email has been scanned by the MessageLabs Email Security System.

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## **NOTICE OF PUBLICATION**

**State of New Mexico  
Energy, Minerals and Natural Resources Department  
Oil Conservation Division**

Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following Stage 1/Stage 2 Abatement Plan Proposal has been submitted to the Director of the Oil Conservation Division, 1220 S. St. Francis Dr., Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

Rice Operating Company, Marvin Burrows, Engineering Manager, Telephone (575) 393-9174, 122 West Taylor, Hobbs, New Mexico 88240, has submitted a Stage 1/Stage 2 Abatement Plan (AP-48) for the Pipeline Junction L-1, Justis Salt Water Disposal System, located approximately 5.0 miles northeast of Jal in Unit Letter L, Section 1, Township 25 South, Range 37 East, Lea County, New Mexico. Rice Operating Company operates a saltwater disposal pipeline at the site. In the past seven quarters, BTEX parameters have not been detected at or above reporting limits. Chloride impact has been observed in the groundwater at the site and has been delineated. The Stage 1/Stage 2 Abatement Plan proposes that quarterly sampling of all monitor wells will continue until results meet approval of the NMOCD. The information generated will be evaluated and utilized to develop a groundwater remedy, if necessary. The monitor well results will be reported annually until closure. The Stage 1/Stage 2 Abatement Plan also includes a soil Corrective Action Plan.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The Stage 1/Stage 2 Abatement Plan may be viewed at the above address or at the Oil Conservation Division District Office, 1625 N. French Drive, Hobbs, New Mexico 88240, Telephone (575) 393-6161 between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed Stage 1/Stage 2 Abatement Plan, the Director of the Oil Conservation Division shall allow thirty (30) days after the date of publication of this notice during which written requests for a public hearing that includes reasons why a hearing should be held and written comments may be submitted to him.

**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Friday, January 09, 2009 12:47 PM  
**To:** 'Hack Conder'  
**Cc:** Price, Wayne, EMNRD; Johnson, Larry, EMNRD; 'Reed, Timothy'  
**Subject:** Stage 1 / Stage 2 Abatement Plan (AP-48) Justis Jct. L-1 Site Partial Suspension of BTEX Analyses Approval

**RE: Stage 1 / Stage 2 Abatement Plan (AP-48) Partial Suspension of BTEX Analyses Approval for the Rice Operating Company's Justis Jct. L-1 Site Unit Letter L, Section 1, T25S, R37E, Lea County, New Mexico**

Dear Mr. Conder:

Upon review of the request for suspension of laboratory analyses for BTEX in the Stage / Stage 2 Abatement Plan for the Rice Operating Company's (ROC) Justis Jct. L-1 Site, dated January 12, 2007, and associated file documents, the New Mexico Oil Conservation Division (OCD) hereby approves the suspension of laboratory analyses for BTEX at the specified groundwater monitoring wells, MW-1, MW-2, MW-3 and MW-4 at the above-referenced site.

MW-5 at the above-referenced site needs one additional groundwater sampling event (as of the end of 2007) 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