

AP - 66

**STAGE 2
REPORTS**

DATE:

July 23, 2009



CERTIFIED MAIL
RETURN RECEIPT NO. 7099 3400 0017 1742

July 23, 2009

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

RECEIVED OOD
2009 JUL 29 P 1:29

**RE: Stage 2 Final Report and Termination Request
EME Jct N-5 Site (AP-66)
T20S, R37E, Section 5, Unit Letter N
Lea County, New Mexico**

Mr. Hansen:

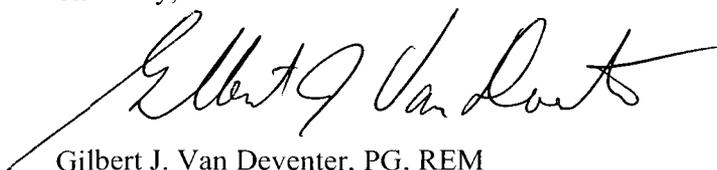
In accordance with the recommendations in your email on January 8, 2009 (Attachment A), Rice Operating Company (ROC) has performed 60 days of aggressive pumping at groundwater monitoring well MW-2 to further delineate the site. A solar-powered submersible pump was installed in MW-2 on May 11, 2009, after a lengthy-delay by the BLM to grant access. Photographs of the groundwater recovery system are included in Attachment B. The aquifer at the site exhibits low well yield characteristics; thus, the pump ran intermittently at a rate of 0.5 gallons per minute (gpm). A total of 4,180 gallons of water was recovered from the well over the 60 day period which ended on July 13, 2009 and was hauled off for pipeline maintenance use. During the groundwater recovery operations, three groundwater recovery samples were collected for analysis of chloride concentrations (Attachment C) which averaged at 963 mg/L.

A copy of the *Request for Closure* submitted to NMOCD on July 16, 2008 is included in Attachment D for your convenience. Now that all abatement requirements have been met in accordance with 19.15.30 NMAC and NMOCD recommendations, ROC respectfully requests closure/termination of the regulatory file for this site. Upon NMOCD approval of site termination, ROC will plug the monitoring wells.

Stage 2 Final Report and Termination Request
EME Jct. N-5 Site (AP-66)
T20S-R37E - Section 5, Unit Letter N

Thank you for your consideration concerning this final report and request for site termination. 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

Attachments (NMOCD correspondence, laboratory reports, photo documentation)

cc: Hack Conder (ROC)
Brad Jones (NMOCD Santa Fe)
Buddy Hill (NMOCD-District 1)

ATTACHMENT A

NMOCD email (January 8, 2009)

From: "Hansen, Edward J., EMNRD" <edwardj.hansen@state.nm.us>
To: "Hack Conder" <hconder@riceswd.com>
Cc: "Price, Wayne, EMNRD" <wayne.price@state.nm.us>; "Johnson, Larry, EMNRD" <arry.johnson@state.nm.us>; "Gil Van Deventer" gilbertvandeventer@suddenlink.net>
Subject: Request for Closure of the Amended Stage 2 Abatement Plan (AP-66) further delineation
Date: Thursday, January 08, 2009 10:40 AM

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

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ATTACHMENT B

Photograph of Groundwater Recovery System



ATTACHMENT C

Laboratory Analytical Reports
And
Chain of Custody Documentation



PHONE (575) 397-2320 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
 RICE OPERATING COMPANY
 ATTN: HACK CONDER
 122 WEST TAYLOR
 HOBBS, NM 88240
 FAX TO: (575) 397-1471

Receiving Date: 05/14/09
 Reporting Date: 05/15/09
 Project Number: NOT GIVEN
 Project Name: EME N-5
 Project Location: NOT GIVEN

Analysis Date: 05/15/09
 Sampling Date: 05/14/09
 Sample Type: GROUNDWATER
 Sample Condition: INTACT
 Sample Received By: ML
 Analyzed By: HM

LAB NO.	SAMPLE ID	Cl ⁻ (mg/L)
H17433-1	EME N-5 MW #2	950
Quality Control		500
True Value QC		500
% Recovery		100
Relative Percent Difference		< 0.1
METHOD: Standard Methods		4500-ClB

Chemist

Date

H: 7433 RICE

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101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603
(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

BILL TO				ANALYSIS REQUEST			
Company Name:	Project Manager:	P.O. #:	Company:	Company:	Company:	Company:	Company:
Rice Operating Co.	Hack Center						
Address: 102 S.W. Taylor	City: Hobbs	State: NM Zip: 88240	Attn:				
Phone #: 505-787-9179	Fax #: 505-787-9171		Address:				
Project #:	Project Owner:		City:				
	Project Name: ELME N-5		State:				
	Project Location:		Phone #:				
	Sampler Name: Alcat Carbon		Fax #:				
Lab I.D.	Sample I.D.		MATRIX	IPRESERV	SAMPLING	DATE	TIME
ELME N-5 IN-PCS			WASTEWATER GROUNDWATER SOIL OIL SLUDGE OTHER	ICE/COOL ACID/BASE OTHER		6/14/07	3:29pm
			(G)RAB OR (COMP)	# CONTAINERS			

PLEASE NOTE: Facility and Damages: Cardinal, facility and client's exclusive liability for any claim arising whether based on contract or tort that is limited to the amount paid by fee client for the analysis. All claims including those for equipment and any other claims whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In the event a Cardinal employee is involved in an accident, Cardinal shall not be liable for any damages, including without limitation, business interruption, loss of use, or loss of profits, incurred by third parties, or for any other damages of whatever nature, arising out of the accident, unless such claim is submitted to Cardinal within the time period stated above in writing.

Relinquished By: _____ Date: _____ Time: _____
 Received By: _____ Date: _____ Time: _____
 Delivered By: (Circle One) _____
 Sampler - UPS - Bus - Other: _____
 Checked By: _____ (Initials)
 Phone Result: Yes No
 Fax Result: Yes No
 Remarks: Email transfer of information to Alcat Carbon

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476



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PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: HACK CONDER
122 W. TAYLOR
HOBBS, NM 88240
FAX TO: (575) 397-1471

Receiving Date: 05/20/09
Reporting Date: 05/26/09
Project Number: NOT GIVEN
Project Name: EME JUNCTION N-5
Project Location: T20S-R37E-SEC5 N~ LEA CO., NM

Sampling Date: 05/18/09
Sample Type: WATER
Sample Condition: COOL & INTACT
Sample Received By: ML
Analyzed By: ZL

LAB NUMBER	SAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE		05/22/09	05/22/09	05/22/09	05/22/09
H-7467-1	MONITOR WELL #1	<0.001	<0.001	<0.001	<0.003
H-7467-2	MONITOR WELL #2	<0.001	<0.001	<0.001	<0.003
H-7467-3	MONITOR WELL #3	<0.001	<0.001	<0.001	<0.003
Quality Control		0.048	0.057	0.053	0.163
True Value QC		0.050	0.050	0.050	0.150
% Recovery		96.0	114	106	109
Relative Percent Difference		14.5	15.1	11.8	10.5

METHOD: EPA SW-846 8021 B

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE,
AND TOTAL XYLENES.

Chemist

Date



ARDINAL LABORATORIES

PHONE (575) 393-2326 • 191 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: HACK CONDER
122 WEST TAYLOR
HOBBS, NM 88240
FAX TO: (575) 397-1471

Receiving Date: 05/20/09
Reporting Date: 05/28/09
Project Number: NOT GIVEN
Project Name: EME JUNCTION N-5
Project Location: T20S-R37E-SEC5 N ~ LEA CO., NM

Sampling Date: 05/18/09
Sample Type: WATER
Sample Condition: COOL & INTACT
Sample Received By: ML
Analyzed By: AB/CK/HM

LAB NO.	SAMPLE ID	Cl ⁻ (mg/L)	SO ₄ ²⁻ (mg/L)	TDS (mg/L)
Analysis Date:		05/22/09	05/22/09	05/22/09
H17467-1	MONITOR WELL #1	588	99.8	1,540
H17467-2	MONITOR WELL #2	1,040	223	2,260
H17467-3	MONITOR WELL #3	520	99.4	1,220
Quality Control		490	41.6	NR
True Value QC		500	40.0	NR
% Recovery		98.0	104	NR
Relative Percent Difference		2.0	1.7	0.3
METHOD: Standard Methods, EPA		4500-Cl ⁻ B	375.4	160.1

Chemist

Date

H17467 RICE

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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: <u>High Operating Co</u> Project Manager: <u>Chuck Giesler</u> Address: <u>1021 W. Taylor</u> State: <u>TX</u> Zip: <u>79603</u> City: <u>Hobbs</u> Phone #: <u>505-393-9101</u> Fax #: <u>505-393-1911</u> Project #: _____ Project Owner: _____ Project Name: <u>11424112</u> Project Location: <u>6015 615</u> Sampler Name: <u>Chuck Giesler</u>		BILL TO															
P.O. #: _____ Company: _____ Alt.: _____ Address: _____ City: _____ State: _____ Zip: _____ Phone #: _____ Fax #: _____		ANALYSIS REQUEST															
Lab I.D. <u>Sample I.D.</u> <u>11424112</u>		MATRIX <input type="checkbox"/> SOIL <input type="checkbox"/> WASTEWATER <input type="checkbox"/> GROUNDWATER <input checked="" type="checkbox"/> # CONTAINERS <input type="checkbox"/> (G)RAB OR (C)OMP		PRESERV <input type="checkbox"/> ICE/COOL <input type="checkbox"/> ACID/BASE <input type="checkbox"/> OTHER		SAMPLING DATE <u>5/21/09</u> TIME <u>2:30 PM</u>											
FOR USE ONLY Relinquished By: _____ Date: <u>5/21/09</u> Time: _____		Received By: _____ Date: _____ Time: _____		Delivered By: (Circle One) <input type="checkbox"/> Bus <input type="checkbox"/> Other		Sample Condition <input type="checkbox"/> Cool <input type="checkbox"/> Intact <input type="checkbox"/> Yes <input type="checkbox"/> No		Checked By: _____ <input type="checkbox"/> Yes <input type="checkbox"/> No		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #: _____ Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Fax #: _____		REMARKS: <u>2 bags of material for analysis</u> <u>see file 11424112</u>					

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PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

July 14, 2009

Hack Conder
Rice Operating Company
122 West Taylor
Hobbs, NM 88240

Re: EME N-5 (Revised)

Enclosed are the results of analyses for sample number H17624, received by the laboratory on 06/12/09 at 5:00 pm.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method SW-846 8260	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method TX 1005	Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

Total Number of Pages of Report: 3 (includes Chain of Custody)

Sincerely,

Celey D. Keene
Laboratory Director



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ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: HACK CONDER
122 W. TAYLOR STREET
HOBBS, NM 88240
FAX TO: (575) 397-1471

Receiving Date: 06/12/09
Reporting Date: 07/14/09
Project Number: NOT GIVEN
Project Name: MW-2
Project Location: EME N-5

Sampling Date: 06/12/09
Sample Type: GROUNDWATER
Sample Condition: INTACT
Sample Received By: ML
Analyzed By: AB/CK/HM

LAB NUMBER/SAMPLE ID	Na (mg/L)	Ca (mg/L)	Mg (mg/L)	K (mg/L)	Conductivity (μ S/cm)	T-Alkalinity (mgCaCO ₃ /L)
ANALYSIS DATE	06/18/09	06/18/09	06/18/09	06/18/09	06/16/09	06/16/09
H17324-1 MW-2	444	248	82.6	6.9	3,670	344
Quality Control	NR	49.7	52.5	2.48	1,410	NR
True Value QC	NR	50.0	50.0	3.00	1,413	NR
% Recovery	NR	99.4	105	82.0	99.7	NR
Relative Percent Difference	NR	3.3	2.6	12.2	0.1	NR

METHODS: SM3500-Ca-D, A3500-Mg E | 3049 | 120.1 | 310.1

ANALYSIS DATE	Cl (mg/L)	SO ₄ (mg/L)	CO ₃ (mg/L)	HCO ₃ (mg/L)	pH (S.U.)	TDS (mg/L)
06/15/09	06/15/09	06/16/09	06/16/09	06/16/09	06/16/09	06/17/09
H17324-1 MW-2	860	201	0	420	7.02	2,530
Quality Control	490	38.8	NR	1000	7.07	NR
True Value QC	500	40.0	NR	1000	7.00	NR
% Recovery	98.0	97.1	NR	100	101	NR
Relative Percent Difference	2.0	2.3	NR	1.2	0.7	3.2

METHODS: SM4500-Cl-B | 375.4 | 310.1 | 310.1 | 150.1 | 160.1

*Revised Report.

Chemist

Date

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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

CARDINAL LABORATORIES

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(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

Company Name: Rice Operating Co.
Project Manager: Mack Conder
Address: 102 W. Taylor
City: Hobbs State: NM Zip: 88240
Phone #: (505) 393-9174 Fax # (505) 393-1471
Project #: Project Owner:
Project Name: MW-1
Project Location: EME N-5
Sampler Name: Noel Carmona

Lab I.D.	Sample I.D.	(G)RAB OR (C)IMP	# CONTAINERS	MATRIX				PRESERV.	SAMPLING	DATE	TIME
				WASTEWATER	GROUNDWATER	SOIL	SLUDGE				
1-174241	24961-1	✓	1	✓					6-12-01	2:30 PM	

Ct/Analysis

ANALYSIS REQUEST

BILL TO

P.O. #:
Company:
Attn:
Address:
City:
State: **Zip:**
Phone #:
Fax #:

PLEASE NOTE: Lead, Cadmium, Copper, Zinc, Nickel, and Manganese require a clean, dry, and sealed container for any clear water sample. For any other water sample, use a clean, dry, and sealed container. In the event that a sample is not analyzed, the sample must be stored in a cool, dry place. Samples must be analyzed within 30 days of receipt. Samples must be analyzed within 30 days of receipt. Samples must be analyzed within 30 days of receipt.

Relinquished By: [Signature] Date: 6-12-01 Time: 3:00
Received By: [Signature] Date: 6-12-01 Time: 3:00
Relinquished By: [Signature] Date: Time:
Received By: [Signature] Date: Time:

Delivered By: (Circle One)
 Sampler - UPS - Bus - Other

Sample Condition: Cool Intact (Physique)
 Yes No

Checked By: [Signature]

Phone Result: Yes No **Add'l Phone #:**
Fax Result: Yes No **Add'l Fax #:**
REMARKS: EME1 header of 12/20/01
 Laboratory @ Rice SWD, CTM

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476



**ARDINAL
LABORATORIES**

PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

July 14, 2009

Hack Conder
Rice Operating Company
122 West Taylor
Hobbs, NM 88240

Re: EME N-5 (Revised)

Enclosed are the results of analyses for sample number H17740, received by the laboratory on 07/01/09 at 4:40 pm.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method SW-846 8260	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method TX 1005	Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

Total Number of Pages of Report: 3 (includes Chain of Custody)

Sincerely,

Celey D. Keene
Laboratory Director

This report conforms with NELAP requirements.



ARDINAL LABORATORIES

PHONE (575) 893-2326 • 191 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: HACK CONDER
122 W. TAYLOR STREET
HOBBS, NM 88240
FAX TO: (575) 397-1471

Receiving Date: 07/01/09
Reporting Date: 07/14/09
Project Number: NOT GIVEN
Project Name: MW-2 WELL
Project Location: EME N-5

Sampling Date: 07/01/09
Sample Type: GROUNDWATER
Sample Condition: COOL & INTACT
Sample Received By: ML
Analyzed By: HM

LAB NUMBER SAMPLE ID	Na (mg/L)	Ca (mg/L)	Mg (mg/L)	K (mg/L)	Conductivity (μ S/cm)	T-Alkalinity (mgCaCO ₃ /L)
ANALYSIS DATE	07/06/09	07/07/09	07/07/09	07/07/09	07/06/09	07/06/09
H17740-1 MW-2 WELL	413	268	80.2	10.2	3,420	340

Quality Control	NR	49.7	52.5	3.46	1,412	NR
True Value QC	NR	50.0	50.0	3.00	1,413	NR
% Recovery	NR	99.4	105	82.0	99.9	NR
Relative Percent Difference	NR	3.3	2.5	12.2	0.3	NR

METHODS: SM3500-Ca-D 43500-Mg E 8049 120.1 310.1

	Cl (mg/L)	SO ₄ (mg/L)	CO ₃ (mg/L)	HCO ₃ (mg/L)	pH (s.u.)	TDS (mg/L)
ANALYSIS DATE	07/06/09	07/07/09	07/06/09	07/06/09	07/06/09	07/06/09
H17740-1 MW-2 WELL	960	209	0	419	6.95	2,530

Quality Control	490	38.8	NR	964	7.02	NR
True Value QC	500	40.0	NR	1000	7.00	NR
% Recovery	98.0	97.1	NR	96.4	100	NR
Relative Percent Difference	2.0	4.0	NR	3.7	0.3	0.3

METHODS: SM4500-Cl-B 375.4 310.1 310.1 150.1 160.1

*Revised Report.

Chemist

Date

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ATTACHMENT D

Request for Closure Letter

(July 16, 2008)



CERTIFIED MAIL
RETURN RECEIPT 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 *Stage 1 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 in 1959
- 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

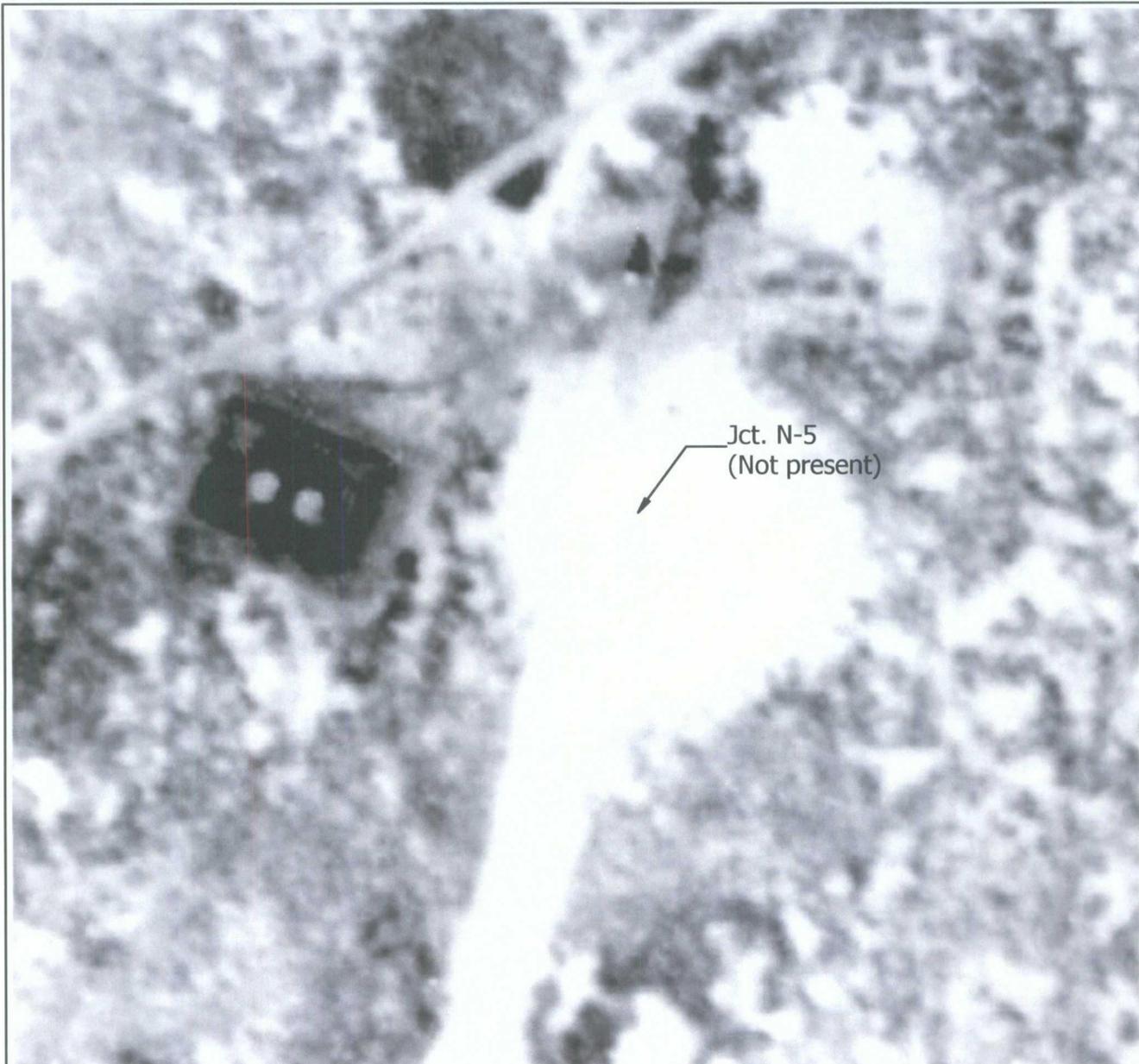
Attachments: historical aerial photographs, recent digital photographs, and compact disk)

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

ATTACHMENT A

HISTORICAL AERIAL PHOTOGRAPHS

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



Jct. N-5
(Not present)

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



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 in 1959
 Other non-ROC pipelines present (stressed vegetation)

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



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

1964



Observations:

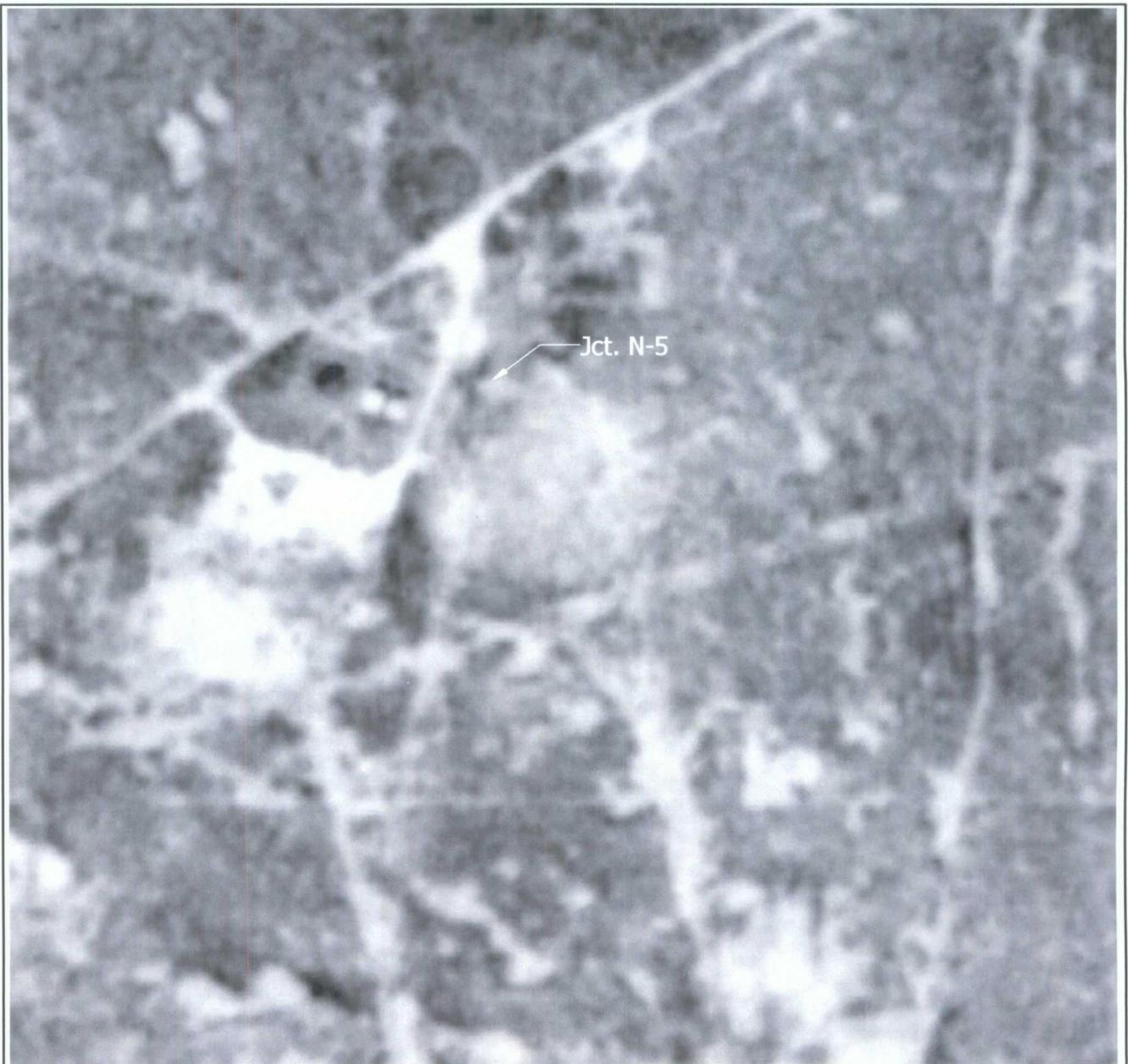
- Union Texas Petroleum Corp tank battery in place with four tanks.
- Britt B #1 oil & gas well is present and active
- Large pit located southeast of tank battery and the N-5 junction box is in use.
- The future location of MW-2 is noted at the southeast edge of the pit.
- Unknown structure between 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



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

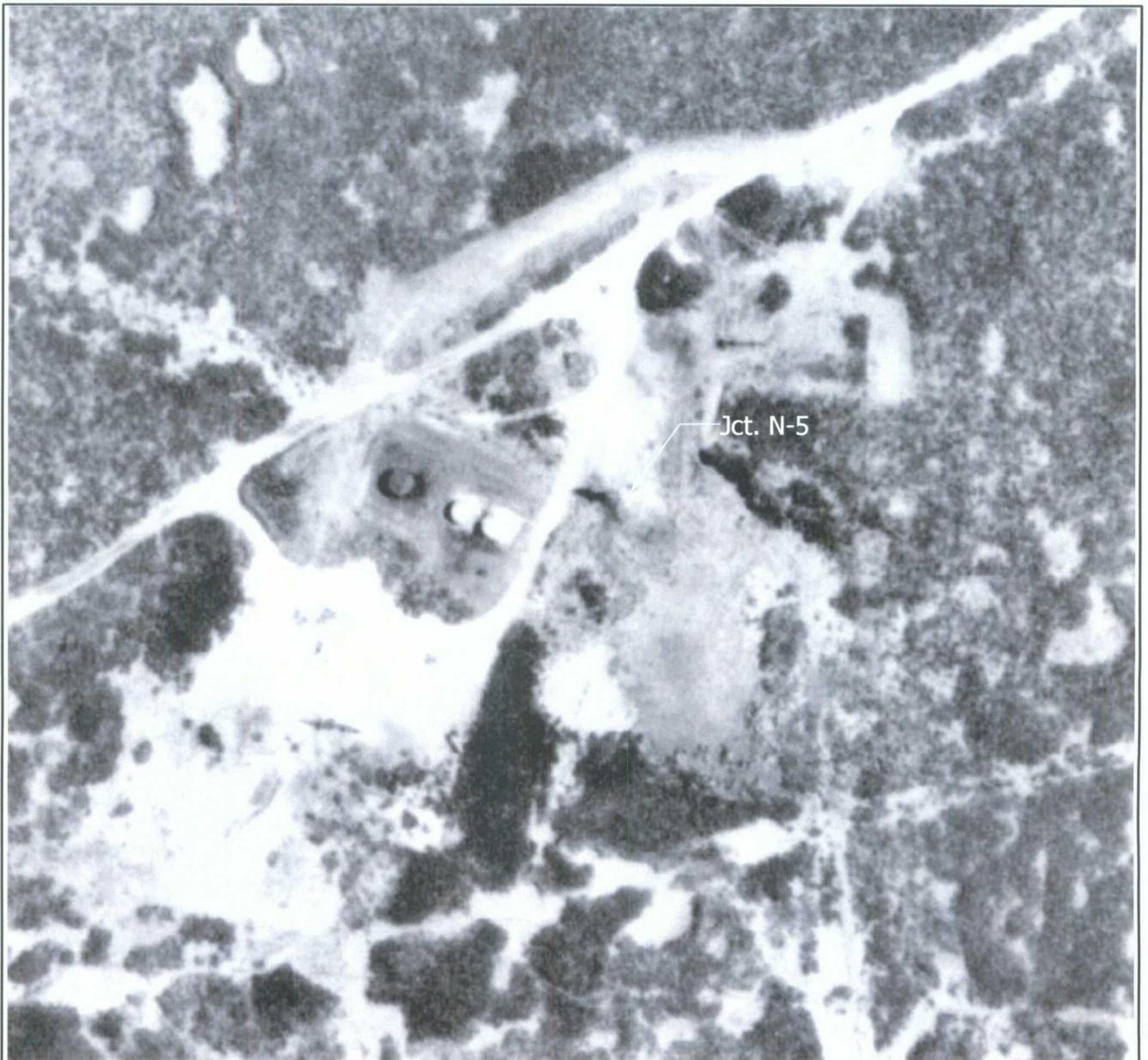


EME Jct. N-5 Site (AP-66)

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



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



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

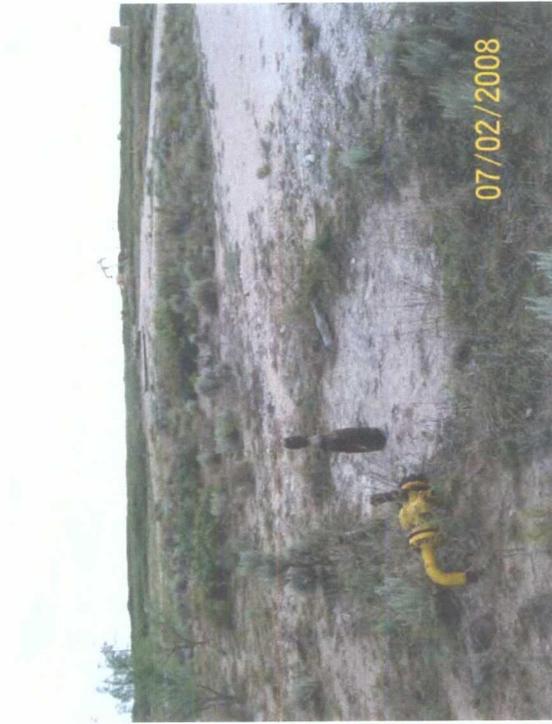
2003

ATTACHMMENT B

DIGITAL PHOTOGRAPHS

(JULY 2, 2008)

ATTACHMENT B (Page 1 of 2)



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.

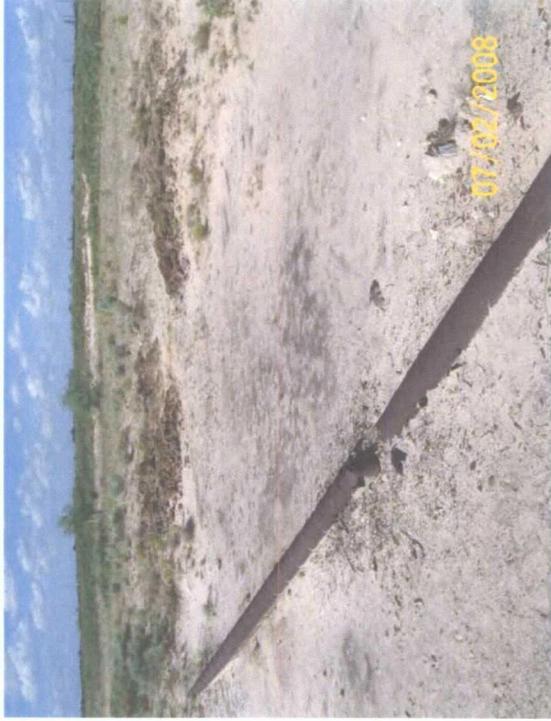


3: View facing northeast showing old crude-impacted surface soil at former tank battery (~120 ft west of N-5 junction box).



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

ATTACHMENT B (Page 2 of 2)



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>
To: "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
Trident Environmental
P. O. Box 7624, Midland TX 79703
Work/Mobile: 432-638-8740
Fax: 432-403-9968
Home: 432-682-0727

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Gil Van Deventer

From: "Gil Van Deventer" <gilbertvandeventer@suddenlink.net>
 To: "Hansen, Edward J., EMNRD" <edwardj.hansen@state.nm.us>
 Cc: "Johnson, Larry, EMNRD" <larry.johnson@state.nm.us>; "Geoffrey Leking" <GeoffreyR.Leking@state.nm.us>;
 "Haskell Conder" <hconder@riceswd.com>; "Buddy Hill" <larry.hill@state.nm.us>; "Katie Jones"
 <kjones@riceswd.com>; "Jones, Brad A., EMNRD" <brad.a.jones@state.nm.us>
 Sent: Thursday, July 23, 2009 2:29 PM
 Attach: EME N-5_Final Report_Termination Request.pdf
 Subject: Stage 2 Final Report and Termination Request for the EME Jct. N-5 Site (AP-66)

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

Subject: ^{Stage 2} ~~ICR~~ Report and Termination Request

Site Name: EME Jct. ^{N-5} ~~J-1~~ Site (AP-66)

~~NMOCD Case No. 1R-0427-170~~

Site Agent: RICE Operating Company

Site Location: T20S-R³⁷~~36~~E-Section ⁵~~4~~, Unit Letter ^N~~#~~, Lea County, New Mexico
₁ ₁ _X

Hello Edward:

Attached is the *Stage 2 Final Report and Termination Request* for the EME Jct. N-5 Site (AP-66). One complete hard copy and one copy on compact disk will be sent to you via USPS Certified Mail (# 7099 3400 17 1737 1742) today. Upon receipt from Trident, ROC will also deliver 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
 Trident Environmental
 P. O. Box 7624, Midland TX 79708
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