

AP - 83

# GENERAL CORRESPONDENCE

YEAR(S):  
2009

**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Friday, September 04, 2009 4:37 PM  
**To:** 'Hack Conder'  
**Cc:** Marvin Burrows; Scott Curtis; Johnson, Larry, EMNRD  
**Subject:** Rescind Abatement Plan (AP-84)

**RE: Rice Operating Company's  
EME C-16(2) Leak Site  
Unit Letter C, Section 16, T20S, R37E, NMPM, Lea County, New Mexico  
Rescind Abatement Plan (AP-84) Submittal Requirement  
Now Remediation Plan (1R-477)**

Dear Mr. Conder:

The New Mexico Oil Conservation Division (OCD) has received Rice Operating Company's report and request to close the above-referenced site (dated July 10, 2009). Since the site has been remediated in a timely matter, the OCD hereby rescinds the requirement for submittal of an abatement plan (AP-84) under 19.15.30 NMAC (Part 30; formally, Rule 19). Also, since the site has been remediated, the termination of the remediation plan (1R-477) will be approved in accordance with 19.15.29 NMAC (Part 29; formally, Rule 116) (under separate cover).

Please be advised that OCD approval of this rescindment 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

**L. Peter Galusky, Jr. Ph.D., P.G.**

**Texerra**

505 N Big Spring, Suite 404 Midland, Texas 79701

Tel: 432-634-9257 E-mail: [lpg@texerra.com](mailto:lpg@texerra.com)

March 30th, 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  
Rice Operating Company – EME SWD  
C-16(1) Leak – NMOCD Case No. 1R0476  
UL-C, Sec 16 T20S R37E

**AP-83**

Sent via E-mail and Certified Mail/Return Receipt No. 7006 0100 0001 2438 3920

Dear Mr. Jones:

We have been monitoring groundwater chloride and BTEX concentrations at the above-referenced site on a quarterly basis since December of 2006 (Figures 1, 2; Tables 1-3). Concentrations have on only one occasion exceeded the laboratory detection limits for BTEX: 0.001 ppm benzene in the up-gradient monitor well (MW-3) on August 4<sup>th</sup>, 2008 (see Table 3). We therefore respectfully request permission to cease the sampling for and analysis of BTEX at this location.

Please be advised, however, that we do plan to continue the quarterly sampling of groundwater chloride concentrations, pursuant to the Corrective Action Plan for this site.

ROC is the service provider (agent) for the EME Salt Water Disposal 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.

We appreciate your consideration of this request.

Sincerely,



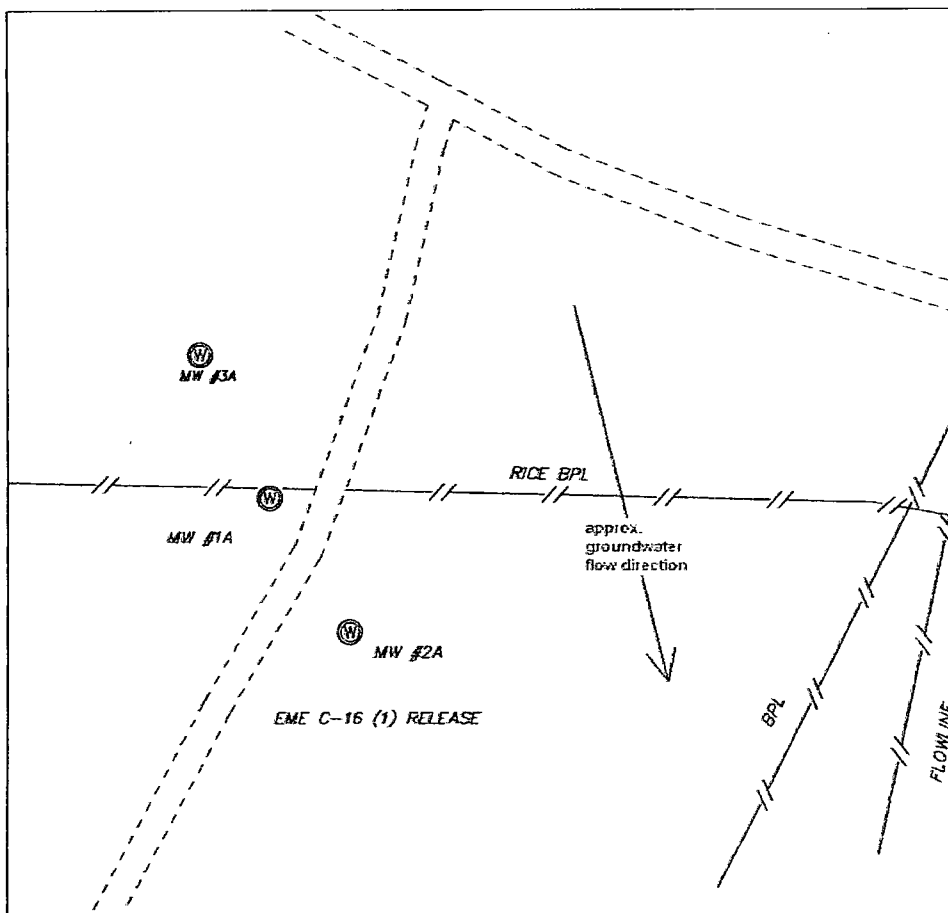
L. Peter Galusky, Jr. Ph.D.  
Principal

Cc: Rice Operating Company, Edward Hansen (NMOCD)

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**Figure 1** – EME C16(1) location.



**Figure 2 – EME C16(1) approximate locations of monitor well.**  
MW 1A is near the center of the release.

**Texerra**

| MW | Depth to Water | Sample Date | Cl   | TDS   | Benzene | Toluene | Ethyl Benzene | Total Xylenes | Sulfate |
|----|----------------|-------------|------|-------|---------|---------|---------------|---------------|---------|
| 1  | 18.13          | 12/22/2006  | 8810 | 13400 | <0.001  | <0.001  | <0.001        | <0.001        | 1370    |
| 1  |                | 2/14/2007   | 9170 | 15400 | <0.001  | <0.001  | <0.001        | <0.001        | 1420    |
| 1  | 17.67          | 5/30/2007   | 9100 | 18400 | <0.001  | <0.001  | <0.001        | <0.001        | 1480    |
| 1  | 18.86          | 9/7/2007    | 8197 | 17967 | <0.001  | <0.001  | <0.001        | <0.003        | 1501    |
| 1  | 18.32          | 10/23/2007  | 8100 | 17329 | <0.002  | <0.002  | <0.002        | <0.006        | 1580    |
| 1  | 18.22          | 3/6/2008    | 8000 | 15500 | <0.002  | <0.002  | <0.002        | <0.006        | 1400    |
| 1  | 18.16          | 5/9/2008    | 8100 | 17100 | <0.002  | <0.002  | <0.002        | <0.006        | 1690    |
| 1  |                | 8/4/2008    | 8000 | 16100 | <0.001  | <0.001  | <0.001        | <0.003        | 1700    |
| 1  |                | 11/5/2008   | 7900 | 15900 | <0.001  | <0.001  | <0.001        | <0.003        | 1820    |
| 1  |                | 2/9/2009    | 8200 | 17000 | <0.001  | <0.001  | <0.001        | <0.003        | 1410    |

**Table 1** – Groundwater monitoring (laboratory) data from monitor well, MW-1.

| MW | Depth to Water | Sample Date | Cl   | TDS   | Benzene | Toluene | Ethyl Benzene | Total Xylenes | Sulfate |
|----|----------------|-------------|------|-------|---------|---------|---------------|---------------|---------|
| 2  | 21.09          | 12/22/2006  | 7760 | 12000 | <0.001  | <0.001  | <0.001        | <0.001        | 1650    |
| 2  |                | 2/14/2007   | 8010 | 9650  | <0.001  | <0.001  | <0.001        | <0.001        | 1680    |
| 2  | 20.67          | 5/30/2007   | 7310 | 16400 | <0.001  | <0.001  | <0.001        | <0.001        | 1460    |
| 2  | 21.83          | 9/7/2007    | 7298 | 16619 | <0.001  | <0.001  | <0.001        | <0.003        | 1496    |
| 2  | 21.34          | 10/23/2007  | 7300 | 15746 | <0.002  | <0.002  | <0.002        | <0.006        | 1700    |
| 2  | 21.24          | 3/6/2008    | 7300 | 14200 | <0.002  | <0.002  | <0.002        | <0.006        | 1610    |
| 2  | 21.17          | 5/9/2008    | 6900 | 14500 | <0.002  | <0.002  | <0.002        | <0.006        | 1410    |
| 2  | 22.02          | 8/4/2008    | 7400 | 14900 | <0.001  | <0.001  | <0.001        | <0.003        | 1350    |
| 2  | 21.78          | 11/5/2008   | 7100 | 14200 | <0.001  | <0.001  | <0.001        | <0.003        | 1510    |
| 2  | 21.68          | 2/9/2009    | 7300 | 15000 | <0.001  | <0.001  | <0.001        | <0.003        | 1370    |

**Table 2** – Groundwater monitoring (laboratory) data from monitor well, MW-2.

| MW | Depth to Water | Sample Date | Cl   | TDS   | Benzene | Toluene | Ethyl Benzene | Total Xylenes | Sulfate |
|----|----------------|-------------|------|-------|---------|---------|---------------|---------------|---------|
| 3  | 21.07          | 10/23/2007  | 7900 | 16133 | <0.002  | <0.002  | <0.002        | <0.006        | 1260    |
| 3  | 20.44          | 3/6/2008    | 7800 | 14600 | <0.002  | <0.002  | <0.002        | <0.006        | 1080    |
| 3  | 20.86          | 5/9/2008    | 7900 | 16200 | <0.002  | <0.002  | <0.002        | <0.006        | 1270    |
| 3  | 21.74          | 8/4/2008    | 7800 | 15000 | 0.001   | <0.001  | <0.001        | <0.003        | 1440    |
| 3  | 21.49          | 11/5/2008   | 7500 | 14800 | <0.001  | <0.001  | <0.001        | <0.003        | 1180    |
| 3  | 21.35          | 2/9/2009    | 7600 | 14600 | <0.001  | <0.001  | <0.001        | <0.003        | 1030    |

**Table 3** – Groundwater monitoring (laboratory) data from monitor well, MW-3.