

AP - 67

APPROVALS

YEAR(S):

2009

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, September 29, 2009 2:20 PM
To: 'Hack Conder'
Cc: Leking, Geoffrey R, EMNRD; 'Marvin Burrows'; Scott Curtis
Subject: RE: EME D-1 Recovery @ EME K-6 RW

**RE: Modification to Stage 2 Abatement Plan (AP-67) Approval
for the Rice Operating Company's
EME D-1 Site
Unit Letter D, Section 1, T20S, R36E, Lea County, New Mexico**

Dear Mr. Conder:

The New Mexico Oil Conservation Division (OCD) has received the proposed minor modification to the Stage 2 Abatement Plan (AP-67) for the EME D-1 Site, dated September 28, 2009, and has conducted a review of the modification. The minor modification indicates that Rice Operating Company will continue to meet the requirements of 19.15.30 NAMC, (Part 30 - formerly, Rule 19) for a Stage 2 Abatement Plan. Therefore, the OCD hereby approves the Modified Stage 2 Abatement Plan (AP-67) for above-referenced site in accordance with 19.15.30.18 NMAC.

Please be advised that OCD approval of this modification 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

From: Hack Conder [mailto:hconder@riceswd.com]
Sent: Monday, September 28, 2009 1:19 PM
To: Hansen, Edward J., EMNRD
Subject: FW: EME D-1 Recovery @ EME K-6 RW

Ed,

Per our discussion in the September quarterly meeting, here is a brief justification and request to cease pumping operations at EME D-1 (AP-67) and utilize EME K-6 (AP-46) recovery well to remove the chloride mass for EME D-1 per the Stage 1 Final Investigation Report and Amended Stage 2 Abatement Plan submitted on April 16, 2008.

In this area of Lea County (T20S, R36E, Section 1, Unit Letter D) water yield is obtained from a shallow supply bottomed in Quaternary alluvium. Procurement of the needed recovery water for this site has been made difficult by the restricted occurrence of water; generally low transmissibility, a shallow saturated thickness of 0.5-3.0 ft and evidently low recharge rate of the source. We have installed two recovery wells and have utilized several different types of low flow pumps with no reasonable result. Currently, we have pumped for five months and only recovered 1,100 gallons of water.

EME K-6 is approximately one mile down gradient of EME D-1; also the Chloride and TDS are similar at both sites. By utilizing the EME K-6 recovery well to remove the EME D-1 chloride mass, it would take approximately 3 ½ months and 1,067 barrels of water recovered to remove the chloride mass.

If you have any questions, please contact me.

Thanks.

Hack Conder
Environmental Manager
Rice Operating Company
575-393-9174
fax 575-397-1471

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Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Friday, January 09, 2009 12:48 PM
To: 'Hack Conder'
Cc: Price, Wayne, EMNRD; Johnson, Larry, EMNRD; 'Gil Van Deventer'
Subject: Stage 1 Final Investigation Report and Amended Stage 2 Abatement Plan (AP-67) EME Jct. D-1 Site Suspension of BTEX Analyses Approval

**RE: Stage 1 Final Investigation Report and Amended Stage 2 Abatement Plan (AP-67) Suspension of BTEX Analyses Approval
for the Rice Operating Company's
EME Jct. D-1 Site
Unit Letter D, Section 1, T20S, R36E, Lea County, New Mexico**

Dear Mr. Conder:

Upon review of the request for suspension of laboratory analyses for BTEX in the Amended Stage 2 Abatement Plan for the EME Jct. D-1 Site, dated April 16, 2008, and associated file documents, the New Mexico Oil Conservation Division (OCD) hereby approves the suspension of laboratory analyses for BTEX at groundwater monitoring wells, MW-1, MW-2, MW-3 and MW-4 at the above-referenced site.

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

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, January 07, 2009 5:22 PM
To: 'Hack Conder'
Cc: Price, Wayne, EMNRD; Johnson, Larry, EMNRD; 'Gil Van Deventer'
Subject: ROCs EME Jct. D-1 Site Amended Stage 2 AP-67 Approval

RE: Stage 1 Final Investigation Report and Amended Stage 2 Abatement Plan (AP-67) Approval for the Rice Operating Company's EME Jct. D-1 Site Unit Letter D, Section 1, T20S, R36E, Lea County, New Mexico

Dear Mr. Conder:

The New Mexico Oil Conservation Division (OCD) has received the Amended Stage 2 Abatement Plan for the EME Jct. D-1 Site, dated April 16, 2008, and has conducted a review of the Amended Stage 2 Abatement Plan. The Amended Plan, submitted for the above-referenced site, indicates that Rice Operating Company has met the requirements of OCD Part 30 (formerly, Rule 19) for a Stage 2 Abatement Plan. Therefore, the OCD hereby approves the Amended Stage 2 Abatement Plan (AP-67) for above-referenced site, dated April 16, 2008, in accordance with 19.15.30.16 NMAC.

Please be advised that OCD approval of this Plan 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