

AP - 60

APPROVALS

YEAR(S):

2009

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; 'Katie Lee'
Subject: Suspension of laboratory analyses for BTEX
Attachments: ROC_BTEX Summary.xls

Dear Mr. Conder:

Upon review of the requests for suspension of laboratory analyses for BTEX, dated December 16, 2008, the New Mexico Oil Conservation Division (OCD) hereby approves the suspension of laboratory analyses for BTEX at the specified groundwater monitoring wells on the attached list.

[The well at the Hobbs SWD O-5 site (1R428-69) needs one additional groundwater sampling event 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

ROC / Hicks Projects Proposed Suspension of BTEX Analyses

System	Site	NMOCD case #	Last Submission	MWs where BTEX is ND, # of Quarters	# wells to stop BTEX Analysis
BD	B-29	1R426-169	Status Report	MW1&2: BTEX 4Q	2
EME	M-5 SWD	1R424	Final Closure Report	1: BTEX 13Q, 2: BTEX 22Q	2
EME	K-33-1	1R0427-92	Stage 1 AP	1: BTEX 22Q, 2: BTEX 7Q, 3: BTEX 8Q, 4: BTEX 4Q	4
Hobbs	jct. E-33-1	1R428-67	Corrective Action Plan	BTEX: 10Q	1
Hobbs	O-5	1R428-69	Status Report	EX 7Q, BT 3Q	1
Hobbs	M-4 vent	1R428-76	CAP	BTEX 4Q	1
Hobbs	F-29 SWD	AP-64	Stage 1 & 2	2: BTEX 5Q, 3: BTEX 8Q, 4: BTEX 26Q, 5: BTEX 5Q	4
Vacuum	F-35 SWD	AP-59	AP Amendment Proposal	2: BTEX 10Q, 3D & 3S: BTEX 6Q	3
Vacuum	G-35 SWD	AP-59	AP Amendment Proposal	2: BTEX 10Q, 3D: BTEX 8Q, 3S: BTEX 7Q	3

Total Wells with Proposed BTEX Suspension 21

R. T. HICKS CONSULTANTS, LTD.

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December 16, 2008

Edward J. Hansen
NMOCD Environmental Bureau
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
Via E-mail and Hand Delivery

RECEIVED

DEC 16 2008
Environmental Bureau
Oil Conservation Division

RE: ROC EME K-33-1 NMOCD: 1R0427-92
Plans to discontinue lab analysis of Benzene, Toluene, Ethyl benzene, & Xylenes
Section 33, 19S, 33E, Unit K

Dear Mr. Hansen:

When Rice Operating Company observes three consecutive quarters of laboratory analysis showing any constituent of concern below detection limits, ROC will request from NMOCD a discontinuation of laboratory analysis for that constituent during quarterly sampling, unless evidence suggests that conditions have changed.

At the above referenced site, laboratory analyses for Benzene, Toluene, Ethyl benzene and Xylenes have been below detection limits in all four monitoring wells as noted:

MW-1: from May 2003 – August 2008
MW-2: January 2007-August 2008
MW-3: October 2006- August 2008
MW-4: December 2007- August 2008

As such, ROC requests discontinuation of laboratory analysis for these constituents beginning in our next quarter of data collection.

The attached table presents all ground water data for the site. If you have questions, please contact us or ROC.

Sincerely,
R.T. Hicks Consultants, Ltd.



Katie Lee
Project Scientist

Copy: Rice Operating Company

ROC EME Jct. K-33-1

MW	Sample Date	CI	TDS	Benzene	Toluene	Ethyl Benzene	Total Xylenes	Sulfate
(mg/L)								
1	1/10/2002	872	2635	<0.002	<0.002	<0.002	<0.006	344
1	5/13/2002	860	2680	<1.00	<1.00	<1.00	<2.00	346
1	8/12/2002	913	2510	<0.001	<0.001	<0.001	<0.002	292
1	10/31/2002	842	2530	<0.001	<0.001	<0.001	<0.002	310
1	2/27/2003	877	2070	<0.001	<0.001	<0.001	0.001	305
1	5/22/2003	904	2350	<0.001	<0.001	<0.001	<0.002	264
1	8/21/2003	975	2550	<0.001	<0.001	<0.001	<0.002	274
1	11/19/2003	869	2470	<0.001	<0.001	<0.001	<0.002	282
1	2/18/2004	844	2192	<0.002	<0.002	<0.002	<0.006	43
1	5/26/2004	840	2008	<0.002	<0.002	<0.002	<0.006	113
1	9/2/2004	904	2510	<0.001	<0.001	<0.001	<0.001	304
1	12/21/2004	550	2640	<0.001	<0.001	<0.001	<0.001	216
1	2/11/2005	582	XXX	XXX	XXX	XXX	XXX	XXX
1	5/1/2005	1030	XXX	XXX	XXX	XXX	XXX	XXX
1	8/30/2005	1180	2790	<0.001	<0.001	<0.001	<0.001	XXX
1	10/19/2005	961	2670	<0.001	<0.001	<0.001	<0.001	276
1	1/18/2006	1000	2480	<0.001	<0.001	<0.001	<0.001	264
1	4/18/2006	805	2290	<0.001	<0.001	<0.001	<0.001	207
1	7/17/2006	988	2085	<0.001	<0.001	<0.001	<0.001	298
1	10/12/2006	686	1910	<0.001	<0.001	<0.001	<0.001	283
1	1/29/2007	871	2060	<0.001	<0.001	<0.001	<0.001	167
1	5/14/2007	653	1860	<0.001	<0.001	<0.001	<0.001	233
1	7/17/2007	661	2090	<0.001	<0.001	<0.001	<0.002	238
1	10/2/2007	730	2084	<0.001	<0.001	<0.001	<0.003	269
1	1/23/2008	750	2096	<0.001	<0.001	<0.001	<0.003	272
1	5/27/2008	730	2120	<0.001	<0.001	<0.001	<0.003	284
1	8/14/2008	720	1960	<0.001	<0.001	<0.001	<0.003	295
2	10/12/2006	692	1900	0.0034	0.00405	<0.001	<0.001	237
2	1/29/2007	805	1830	<0.001	<0.001	<0.001	<0.001	255
2	5/14/2007	675	2220	<0.001	<0.001	<0.001	<0.001	215
2	7/17/2007	658	2200	<0.001	<0.001	<0.001	<0.002	201
2	10/2/2007	750	2012	<0.001	<0.001	<0.001	<0.003	302
2	1/23/2008	750	2263	<0.001	<0.001	<0.001	<0.003	317
2	5/27/2008	720	2050	<0.001	<0.001	<0.001	<0.003	241
2	8/14/2008	690	1920	<0.001	<0.001	<0.001	<0.003	248
3	10/12/2006	687	2100	<0.001	<0.001	<0.001	<0.001	296
3	1/29/2007	743	1870	<0.001	<0.001	<0.001	<0.001	314
3	5/14/2007	642	1900	<0.001	<0.001	<0.001	<0.001	255
3	7/17/2007	603	1950	<0.001	<0.001	<0.001	<0.002	242
3	10/2/2007	670	1909	<0.001	<0.001	<0.001	<0.003	295
3	1/23/2008	670	2034	<0.001	<0.001	<0.001	<0.003	310
3	5/27/2008	670	1880	<0.001	<0.001	<0.001	<0.003	254
3	8/14/2008	670	2020	<0.001	<0.001	<0.001	<0.003	310
4	12/10/2007	320	1048	<0.001	<0.001	<0.001	<0.003	131
4	1/23/2008	304	990	<0.001	<0.001	<0.001	<0.003	115
4	5/27/2008	284	982	<0.001	<0.001	<0.001	<0.003	132
4	8/14/2008	292	919	<0.001	<0.001	<0.001	<0.003	132