

AP - 84

**GENERAL
CORRESPONDENCE**

YEAR(S):
2009

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Friday, September 04, 2009 4:36 PM
To: 'Hack Conder'
Cc: Marvin Burrows; Scott Curtis; Johnson, Larry, EMNRD
Subject: Rescind Abatement Plan (AP-83)

**RE: Rice Operating Company's
EME C-16(1) Leak Site
Unit Letter C, Section 16, T20S, R37E, NMPM, Lea County, New Mexico
Rescind Abatement Plan (AP-83) Submittal Requirement
Now Remediation Plan (1R-476)**

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-83) under 19.15.30 NMAC (Part 30; formally, Rule 19). Also, since the site has been remediated, the termination of the remediation plan (1R-476) 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

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(2) Leak – NMOCD Case No. 1R0477
UL-C, Sec 16 T20S R37E

AP-84

Sent via E-mail and Certified Mail w/ 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, Table 1). The concentrations of BTEX (and its individual constituents) have never exceeded the laboratory detection limits (varying between 0.001 to 0.006 ppm) in the three monitor wells (MW-1, MW-2 and MW-3). We, therefore, respectfully request permission to cease the sampling for and analysis of BTEX at this location.

Please be advised that we do plan to continue the quarterly sampling of groundwater chloride and total dissolve solids 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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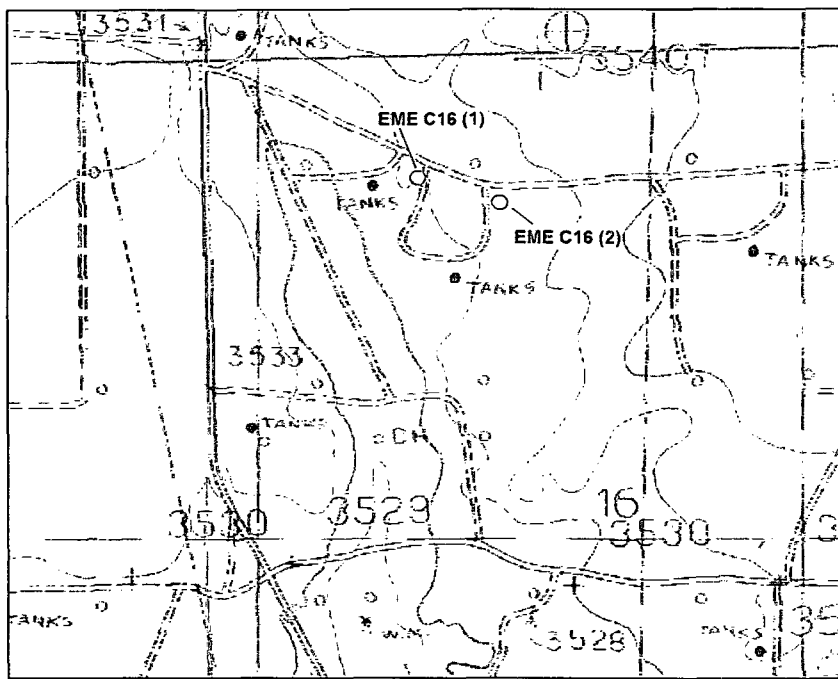


Figure 1- EME C16 (1&2) pipeline release locations. Not to scale

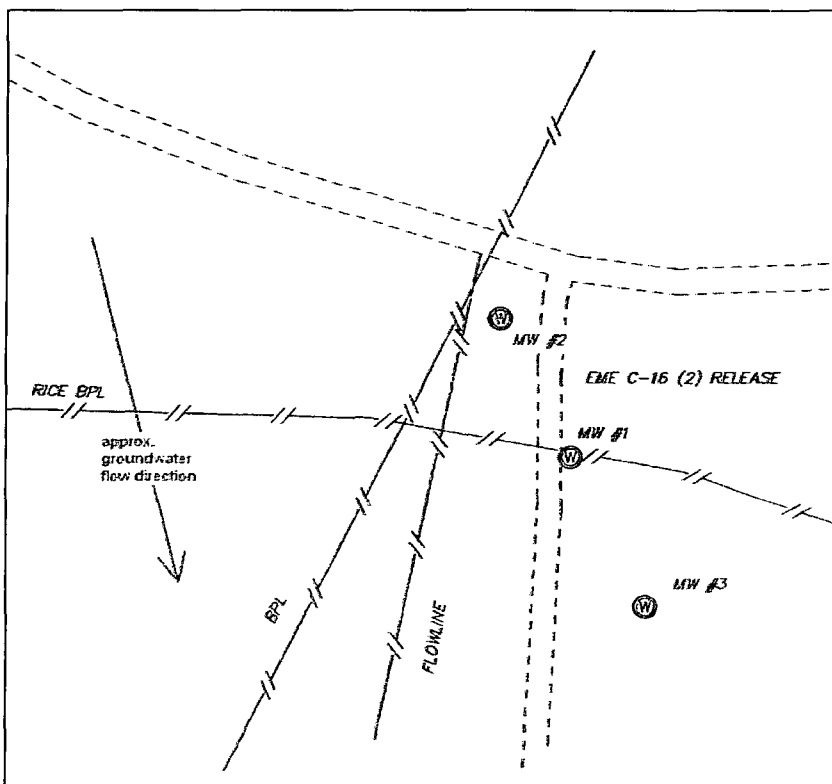


Figure 2 – EME C16(2) pipeline release monitor well locations. Not to scale.

BTEX Concentrations (ppm)			
Benzene			
	<u>MW-1</u>	<u>MW-2</u>	<u>MW-3</u>
12/22/2006	< 0.001	< 0.001	< 0.001
2/14/2007	< 0.001	< 0.001	< 0.001
5/30/2007	< 0.001	< 0.001	< 0.001
9/21/2007	< 0.002	< 0.002	< 0.002
10/24/2007	< 0.002	< 0.002	< 0.002
3/6/2008	< 0.002	< 0.002	< 0.002
5/9/2008	< 0.002	< 0.002	< 0.002
8/4/2008	< 0.001	< 0.001	< 0.001
11/5/2008	< 0.001	< 0.001	< 0.001
Toluene			
	<u>MW-1</u>	<u>MW-2</u>	<u>MW-3</u>
12/22/2006	< 0.001	< 0.001	< 0.001
2/14/2007	< 0.001	< 0.001	< 0.001
5/30/2007	< 0.001	< 0.001	< 0.001
9/21/2007	< 0.002	< 0.002	< 0.002
10/24/2007	< 0.002	< 0.002	< 0.002
3/6/2008	< 0.002	< 0.002	< 0.002
5/9/2008	< 0.002	< 0.002	< 0.002
8/4/2008	< 0.001	< 0.001	< 0.001
11/5/2008	< 0.001	< 0.001	< 0.001
Ethylbenzene			
	<u>MW-1</u>	<u>MW-2</u>	<u>MW-3</u>
12/22/2006	< 0.001	< 0.001	< 0.001
2/14/2007	< 0.001	< 0.001	< 0.001
5/30/2007	< 0.001	< 0.001	< 0.001
9/21/2007	< 0.002	< 0.002	< 0.002
10/24/2007	< 0.002	< 0.002	< 0.002
3/6/2008	< 0.002	< 0.002	< 0.002
5/9/2008	< 0.002	< 0.002	< 0.002
8/4/2008	< 0.001	< 0.001	< 0.001
11/5/2008	< 0.001	< 0.001	< 0.001
Xylene			
	<u>MW-1</u>	<u>MW-2</u>	<u>MW-3</u>
12/22/2006	< 0.001	< 0.001	< 0.001
2/14/2007	< 0.001	< 0.001	< 0.001
5/30/2007	< 0.001	< 0.001	< 0.001
9/21/2007	< 0.006	< 0.006	< 0.006
10/24/2007	< 0.006	< 0.006	< 0.006
3/6/2008	< 0.006	< 0.006	< 0.006
5/9/2008	< 0.006	< 0.006	< 0.006
8/4/2008	< 0.003	< 0.003	< 0.003
11/5/2008	< 0.003	< 0.003	< 0.003

Figure 1 – BTEX concentrations for monitor wells at EME C-16(2).