

AP - 008

## APPROVALS

YEAR(S):

2004-1998

**Price, Wayne**

---

**From:** Price, Wayne  
**Sent:** Tuesday, August 17, 2004 3:00 PM  
**To:** Carolyn Doran Haynes (E-mail)  
**Cc:** Sharon Hall (E-mail); Sheeley, Paul; Johnson, Larry  
**Subject:** Rice I-9 AP#8

The OCD is in receipt of the Stage 2 letter and Abatement Report dated July 14, 2004. OCD hereby approves of the closure activities of the excavated area. In addition, OCD approves of the long term groundwater monitoring plan. Please submit an annual report due on October 15 of each year. The report will follow the same outline as the Stage 2 Abatement report. Please plot constituents of concern and include conclusions and recommendations.

Please be advised that NMOCD approval of this plan does not relieve (Rice Operating Company) of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve (Rice Operating Company) of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Sincerely:

Wayne Price  
New Mexico Oil Conservation Division  
1220 S. Saint Francis Drive  
Santa Fe, NM 87505  
505-476-3487  
fax: 505-476-3462  
E-mail: WPRICE@state.nm.us



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
**Jennifer A. Salisbury**  
Cabinet Secretary

**Lori Wrotenberg**  
Director  
Oil Conservation Division

July 12, 2001

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5357 7713**

Carolyn Doran Haynes  
Operations Engineer  
Rice Operating Company  
122 West Taylor  
Hobbs, New Mexico 88240

RE: Revised Stage 2 Abatement Plan Additional Informational Request  
Stage 2 Abatement Plan (AP-8)  
Junction I-9 Release Site  
NE 1/4 SE 1/4 Section 09-Ts19s-R38e  
Hobbs Salt Water Disposal System  
Lea County, New Mexico

Dear Ms. Haynes:

The New Mexico Oil Conservation Division (OCD) is in receipt of Arcadis Geraghty & Miller's letter dated May 15, 2001 submitted on behalf of Rice Operating Company (ROC). OCD has the following comments specific to each item and approves of the interim plan with the following conditions:

Item 1. OCD defers comment on the public notice.

Item 2. OCD approves of the design and completion of wells as proposed.

Item 3. OCD defers approval on ROC's plan to protect the proposed buried liners. OCD approves of deed recording to notify future land owners, however recommends ROC to propose additional methods such as fencing, signs, permanent markers, etc.

Item 4. Complete.

Item 5. and Item 6.

The proposal requested that OCD approve an interim sampling plan in order to provide technical data to assist ROC in determining the final levels of metals and geochemistry compounds that may be placed back in the excavation and provide delineation information. OCD hereby approves of ROC's request with the following conditions:

1. ROC will notify the OCD Santa Fe office and the OCD District office at least 72 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples during OCD's normal business hours.
2. Samples collected shall be analyzed for total values pursuant to EPA approved methods and approved by OCD.
3. ROC shall also receive written approval before covering any excavated area.

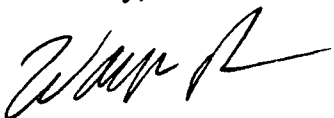
Item 7. The proposed up-gradient Monitor Well (MW-7) location shall be located an additional 300 feet up-gradient from the location as proposed in the March 30, 2001 Proposal figure 1.

**ROC shall submit the results of the findings, leaching model information and results, and submit a final stage 2 abatement plan proposal for OCD approval by August 15, 2001.**

Please be advised that OCD approval of this interim plan does not relieve ROC of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve ROC of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions please do not hesitate to contact me at 505-476-3487 or e-mail [WPRICE@state.nm.us](mailto:WPRICE@state.nm.us).

Sincerely;



Wayne Price-Pet. Engr. Spec.

cc: OCD Hobbs Office  
Bill McNeill-Land Owner  
James P. Lyle-Branch Law Firm  
Arcadis Geraghty & Miller- Sharon Hall e-mail



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

May 30, 2000

**CERTIFIED MAIL**

**RETURN RECEIPT NO. 5051 5727**

Carolyn Doran Haynes  
Operations Engineer  
Rice Operating Company  
122 West Taylor  
Hobbs, New Mexico 88240

RE: Stage 2 Abatement Plan (AP-8)  
Junction I-9 Release Site  
NE 1/4 SE 1/4 Section 09-Ts19s-R38e  
Hobbs Salt Water Disposal System  
Lea County, New Mexico

Dear Ms. Haynes:

The New Mexico Oil Conservation Division (OCD) is in receipt of Rice Operating Company's (ROC) January 05, 2000 Stage 2 Abatement Plan and March 31, 2000 letter containing documentation of the written and public notice for the Stage 2 Abatement Plan (AP-8). **The OCD hereby approves of the Stage 2 Abatement Plan with the following additional conditions:**

1. Install a monitor well down gradient from existing monitor well #MW-2. The completion method shall be consistent with previously approved wells. The location of this well shall be approved by OCD prior to installation.
2. Install a monitor well down gradient of the source area to monitor possible water contamination caused by density gradient effects. The completion method and location of this well shall be approved by OCD prior to installation.
3. The final bottom hole and side wall samples of the excavation will also be analyzed for General Chemistry and WQCC metals in addition to what was proposed in ROC's January 05, 2000 Stage 2 Abatement Plan.

4. All monitor and recovery wells on site shall be sampled and analyzed for BTEX, General Chemistry and WQCC metals before remediation begins. Sampling procedures and analytical methods will be as proposed in ROC's January 05, 2000 Stage 2 Abatement Plan.
5. ROC will notify the OCD Santa Fe office and the OCD District office at least 72 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples during OCD's normal business hours. ROC shall also receive written approval before covering any excavated area.
6. ROC shall submit remediation progress reports quarterly with the first report due on July 31, 2000.

Please be advised that NMOCD approval of this Stage 2 Abatement Plan does not relieve ROC of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve ROC of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions, please contact Wayne Price of my staff at (505-827-7155). On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this review process.

Sincerely,



Roger C. Anderson  
Environmental Bureau Chief  
RCA/lwp

xc: OCD Hobbs Office  
Bill McNeill



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

November 15, 1999

**CERTIFIED MAIL**

**RETURN RECEIPT NO: P 410 425 206**

Carolyn Doran Haynes  
Operations Engineer  
Rice Operating Company  
122 West Taylor  
Hobbs, New Mexico 88240

**RE: Stage 1 Abatement Plan (AP-8)  
Junction I-9 Release Site  
NE 1/4 SE 1/4 Section 09-Ts19s-R38e  
Hobbs Salt Water Disposal System  
Lea County, New Mexico**

Dear Ms. Haynes:

The New Mexico Oil Conservation Division (OCD) has completed a review of Rice Operating Company's September 10, 1999 "Junction I-9 Release Site, Stage 1 Abatement Report (Site Assessment Investigation)". This document contains the results of Rice Operating Company's investigations of the magnitude of contamination related to the junction I-9 release site.

The above referenced Stage 1 site investigation report is approved. Pursuant to OCD Rule 19.E.(4), the OCD requires that Rice Operating Company submit a Stage 2 Abatement Plan Proposal to select and design remedial actions for contaminated soil and ground water which will result in the attainment of the abatement standards and requirements set forth in Rule 19.B. The Stage 2 Abatement Plan Proposal will be submitted to the OCD Santa Fe Office by January 15, 2000 with a copy provided to the OCD Hobbs District Office.

If you have any questions, please contact Wayne Price at (505) 827-7155.

Sincerely,

Roger C. Anderson  
Environmental Bureau Chief

xc: Chris Williams, OCD Hobbs District Supervisor  
Bill McNeil-Landowner



**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT**

**OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131**

August 10, 1999

**CERTIFIED MAIL  
RETURN RECEIPT NO: Z 559 573 600**

Carolyn Doran Haynes  
Operations Engineer  
Rice Operating Company  
122 West Taylor  
Hobbs, New Mexico 88240

**RE: Stage 1 Abatement Plan  
Junction I-9 Release Site  
NE 1/4 SE 1/4 Section 09-Ts19s-R38e  
Hobbs Salt Water Disposal System  
Lea County, New Mexico**

Dear Ms. Haynes:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of Rice Operating Company's (ROC) letter dated July 21, 1999 and Stage 1 Abatement Report. The report points out that down-gradient monitor wells MW-1 and MW-2 contain levels of BTEX higher than the NM WQCC standards. Therefore NMOCD hereby approves of ROC's recommendations to install additional monitor well(s) to delineate the groundwater impact. This approval is subject to the following conditions:

1. All final soil samples submitted for laboratory analyses shall be sampled for BTEX (8021), TPH (418.1 or 8015 GRO & DRO) and Chlorides.
2. ROC shall complete the new monitor well(s) as follows:
  - a. At least 15 feet of well screen shall be placed across the water table interface with 5 feet of the well screen above the water table and 10 feet of the well screen below the water table.
  - b. An appropriately sized gravel pack shall be set in the annulus around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.
  - c. A 2-3 foot bentonite plug shall be placed above the gravel pack.
  - d. The remainder of the hole shall be grouted to the surface with cement containing 3-5% bentonite.
  - e. A concrete pad shall be placed at the surface around the well. The well shall be installed with a suitable protective locking device.
  - f. The well(s) shall be developed after construction using EPA approved procedures.



Carolyn Doran Haynes  
August 10, 1999  
Page 2

3. No less than 48 hours after the well(s) are developed, ground water from all monitor well(s) shall be purged, sampled and analyzed for concentrations of benzene, toluene, ethylbenzene, xylene, polycyclic aromatic hydrocarbons (PAH), total dissolved solids (TDS) and New Mexico Water Quality Control Commission (WQCC) metals and major cations and anions using EPA approved methods and quality assurance/quality control (QA/QC) procedures.
4. All wastes generated during the investigation shall be disposed of at an OCD approved facility.
5. ROC shall submit the results of the investigation to the OCD Santa Fe Office **September 15, 1999** with a copy provided to the OCD Hobbs District Office and shall include the following investigative information:
  - a. A description of all investigation, remediation and monitoring activities which have occurred including conclusions and recommendations.
  - b. A geologic/lithologic log and well completion diagram for each monitor well.
  - c. A water table potentiometric map showing the location of the leaks and spills, excavated areas, monitor wells, and any other pertinent site features as well as the direction and magnitude of the hydraulic gradient.
  - d. Isopleth maps for contaminants of concern which were observed during the investigations.
  - e. Summary tables of all ground water quality sampling results and copies of all laboratory analytical data sheets and associated QA/QC data taken within the past year.
  - f. The quantity and disposition of all recovered product and/or wastes generated.
6. ROC will notify the OCD Santa Fe office and the OCD District office at least 48 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples during OCD's normal business hours.

Please be advised that NMOCD approval of this plan does not relieve ROC of liability should their investigations and/or operations fail to adequately investigate and/or remediate contamination that poses a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve ROC of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,



Wayne Price-Pet. Engr. Spec.  
Environmental Bureau

cc: OCD Hobbs Office  
Bill McNeil-Landowner



**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

May 24, 1999

**CERTIFIED MAIL**  
**RETURN RECEIPT NO: Z 357 870 129**

Carolyn Doran Haynes  
Operations Engineer  
Rice Operating Company  
122 West Taylor  
Hobbs, New Mexico 88240

**RE:   Stage 1 Abatement Plan  
        Junction I-9 Release Site  
        NE 1/4 SE 1/4 Section 09-Ts19s-R38e  
        Hobbs Salt Water Disposal System  
        Lea County, New Mexico**

Dear Ms. Haynes:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of Rice Operating Company's (ROC) letter dated April 23, 1999 concerning public notice requirements for the above captioned Stage 1 Abatement Plan. As of this date, NMOCD has not received any response to the public notices issued. The interim investigation and remediation activities conducted to date are satisfactory and the Stage 1 Abatement Plan i.e. (Investigation Plan) submitted on January 19, 1999 is hereby approved with the following conditions:

1. All final soil samples submitted for laboratory analyses shall be sampled for BTEX (8021), TPH (418.1 or 8015 GRO & DRO) and Chlorides.
2. ROC shall complete the new monitor well(s) as follows:
  - a. At least 15 feet of well screen shall be placed across the water table interface with 5 feet of the well screen above the water table and 10 feet of the well screen below the water table.
  - b. An appropriately sized gravel pack shall be set in the annulus around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.
  - c. A 2-3 foot bentonite plug shall be placed above the gravel pack.
  - d. The remainder of the hole shall be grouted to the surface with cement containing 3-5% bentonite.
  - e. A concrete pad shall be placed at the surface around the well. The well shall be installed with a suitable protective locking device.
  - f. The well(s) shall be developed after construction using EPA approved procedures.

Carolyn Doran Haynes  
May 24, 1999  
Page 2

3. No less than 48 hours after the well(s) are developed, ground water from all monitor well(s) shall be purged, sampled and analyzed for concentrations of benzene, toluene, ethylbenzene, xylene, polycyclic aromatic hydrocarbons (PAH), total dissolved solids (TDS) and New Mexico Water Quality Control Commission (WQCC) metals and major cations and anions using EPA approved methods and quality assurance/quality control (QA/QC) procedures.
4. All wastes generated during the investigation shall be disposed of at an OCD approved facility.
5. ROC shall submit the results of the investigation to the OCD Santa Fe Office **by July 23, 1999** with a copy provided to the OCD Hobbs District Office and shall include the following investigative information:
  - a. A description of all investigation, remediation and monitoring activities which have occurred including conclusions and recommendations.
  - b. A geologic/lithologic log and well completion diagram for each monitor well.
  - c. A water table potentiometric map showing the location of the leaks and spills, excavated areas, monitor wells, and any other pertinent site features as well as the direction and magnitude of the hydraulic gradient.
  - d. Isopleth maps for contaminants of concern which were observed during the investigations.
  - e. Summary tables of all ground water quality sampling results and copies of all laboratory analytical data sheets and associated QA/QC data taken within the past year.
  - f. The quantity and disposition of all recovered product and/or wastes generated.
6. ROC will notify the OCD Santa Fe office and the OCD District office at least 48 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples during OCD's normal business hours.

Please be advised that NMOCD approval of this plan does not relieve ROC of liability should their investigations and/or operations fail to adequately investigate and/or remediate contamination that poses a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve ROC of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions, please contact Wayne Price of my staff at (505) 827-7155.

Sincerely,



Roger C. Anderson  
Environmental Bureau Chief

RCA/wp

cc: OCD Hobbs Office  
Bill McNeil-Landowner



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

**CERTIFIED MAIL**

**RETURN RECEIPT NO: P 288 259 090**

December 17, 1998

Mr. F. Wesley Root  
Projects Manager  
Rice Operating Company (ROC)  
122 West Taylor  
Hobbs, New Mexico 88240

**RE:** Abatement Plan (AP-8) Requirement  
Rice Operating Company  
Hobbs Salt Water Disposal System  
UL I-Sec 9-Ts19s-R38e  
Lea County, New Mexico

Dear Mr. Root:

New Mexico Oil Conservation Division (NMOCD) is in receipt of your letter sent by fax dated December 15, 1998 **requesting permission to initiate emergency interim abatement measures** at the above referenced facility. NMOCD also acknowledges your verbal request pursuant to our telephone conversation on December 17, 1998 to allow three monitor wells to be installed in addition to the one recovery well. It is NMOCD's understanding this decision was made after you confirmed that there is a domestic water well located down gradient from the spill site.

**Therefore due to the potential for impacts on down gradient water wells and pursuant to NMOCD Rule 19.D.(g) your request is hereby approved subject to the following conditions:**

1. All recovery and monitor wells shall be constructed per your drawing, except monitor wells can have different casing size. The annulus above the bentonite plug shall be grouted to the surface with an approved type cement grout containing 3-5% bentonite. Boring logs shall be recorded with all appropriate information.
2. Product recovery records shall be maintained and shall include volumes recovered, the product thickness measured before each recovery event, and the disposition of all waste generated. These Field records shall be maintained and submitted in subsequent reports. ROC shall properly retain a sample of the recovered oil for future possible fingerprinting.



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

3. NMOCD will allow one recovery well as proposed, and three monitor wells strategically located to determine the groundwater gradient and located a sufficient distance from the recovery well to make a preliminary determination of the down gradient extent of contamination.
4. Initial groundwater sampling analysis for all monitor wells shall include volatile organics (Method 8060), Semi-volatile organics (Method 8270), PAH's (Method 8310), WQCC Metals, and General Chemistry (PH, TDS, Conductivity, Major Cations and Anions).
5. ROC shall notify the District office 48 hours in advance before commencing any significant activities.
6. The above emergency action shall not interfere with the normal abatement plan process pursuant to NMOCD Rule 19.

Please be advised that NMOCD approval of this emergency plan does not relieve ROC of liability should their operations fail to adequately investigate and remediate contamination that poses a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve ROC of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,

Wayne Price-Environmental Bureau

cc: Chris Williams-NMOCD District I Supervisor  
Bill McNeill-Hobbs

file: O/wp/riceaba1