

1R - 428-0

**GENERAL
CORRESPONDENCE**

YEAR(S):

RICE Operating Company

122 West Taylor • Hobbs, New Mexico 88240
Phone: (505)393-9174 • Fax: (505) 397-1471

CERTIFIED MAIL
RETURN RECEIPT NO. 7002 2410 0000 4940 2050

May 13, 2005

Mr. Wayne Price
New Mexico Energy, Minerals, & Natural Resources
Oil Conservation Division, Environmental Bureau
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

RE: HOBBS MANWAY JUNCTIONS

Mr. Price:

In response to your May 12 email (enclosed) and our phone conversation today, enclosed are the Final Junction Box Reports for the sites you inquired about. These sites were junctions that were concrete vault manways located within the City of Hobbs. These sites were closed in agreement with then City of Hobbs Engineer, Russ Doss, as part of the Hobbs System Abandonment.

Should you have any questions or concerns regarding these sites, please do not hesitate to contact me. Thank you for the attention you have given to the Rice Operating Company projects.

RICE OPERATING COMPANY



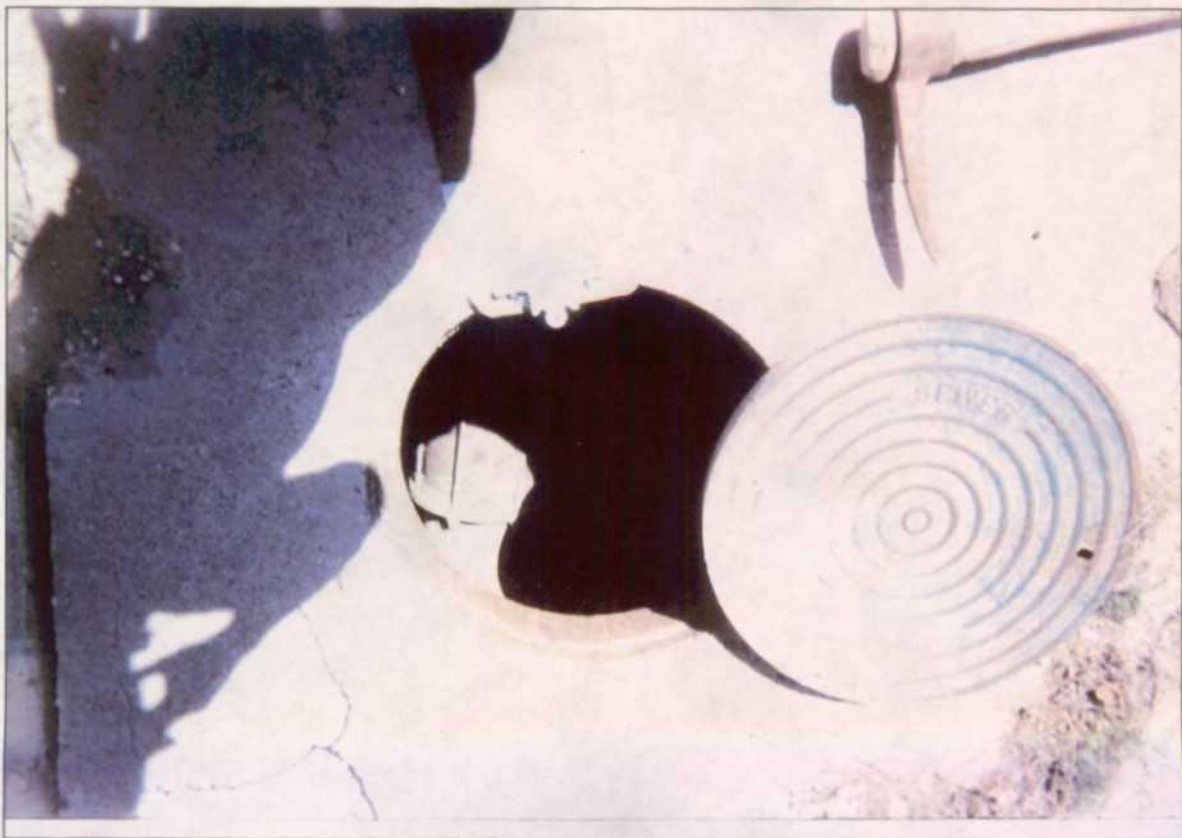
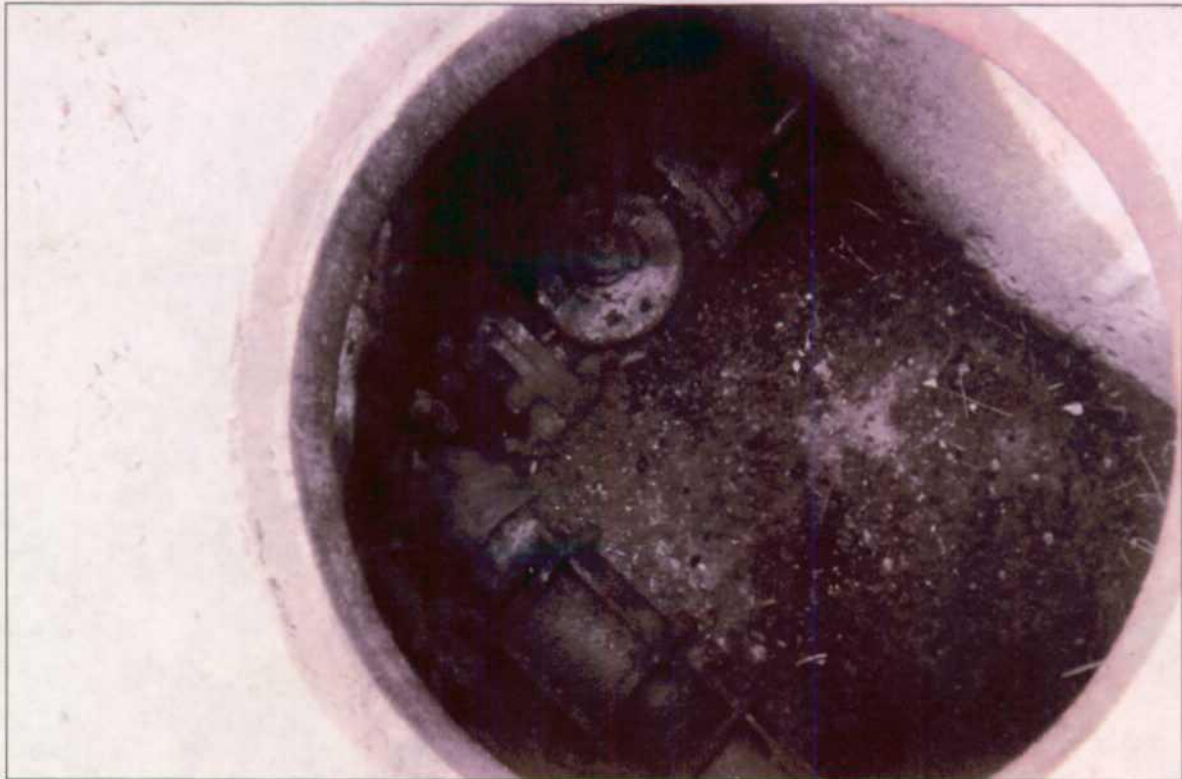
Kristin Farris Pope
Project Scientist

cc: CDH

enclosures: email; Junction Box Final Reports (20), photos

Hobbs Manway Junctions 2001

(before closure and sealing)



Closed + welded



5-18-05 Hobbs Corner I-33-3 N. side of Cain and Grimes

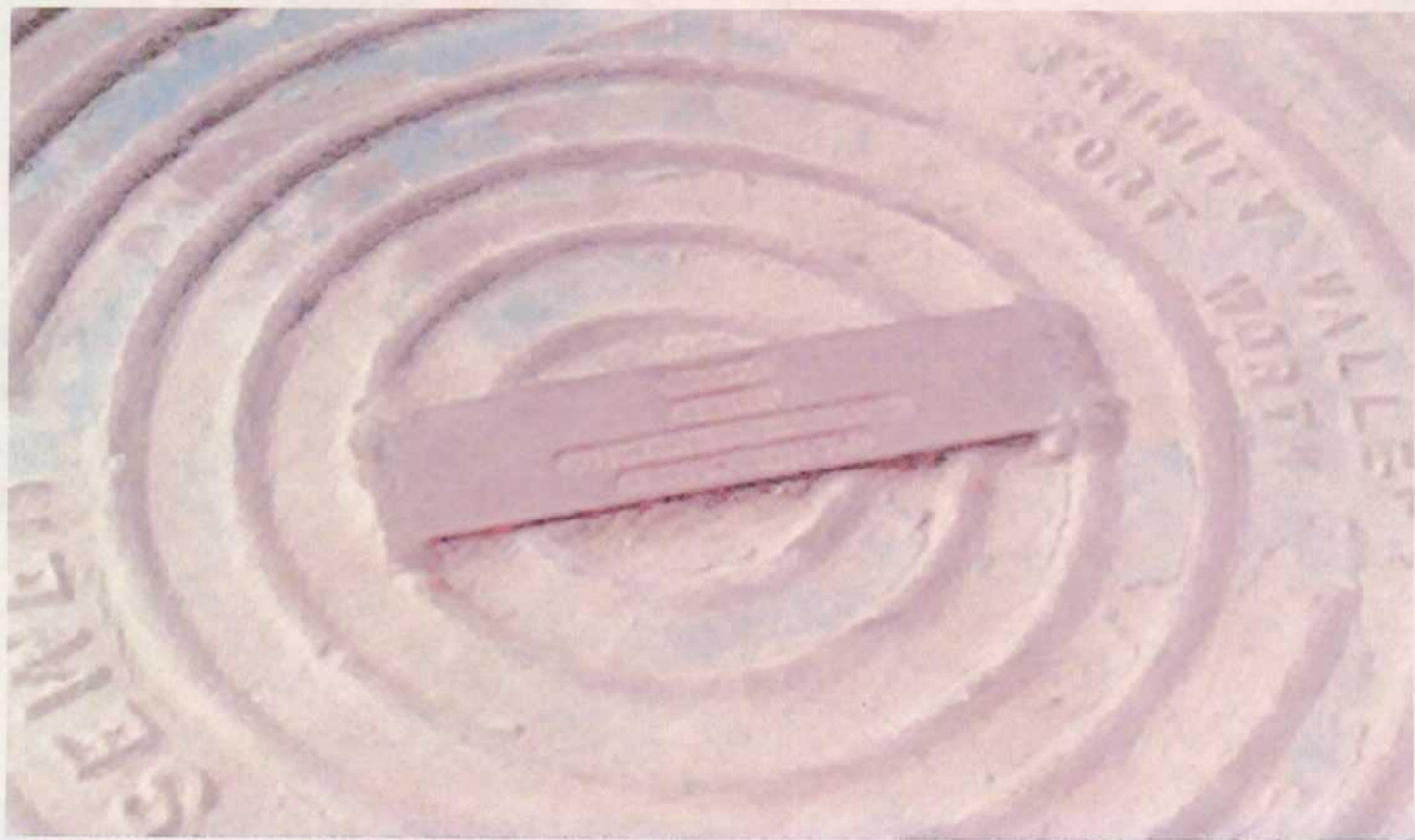


5-18-05 Hobbs Corner I-33-3 N. side of Cain and Grimes

Closed + welded



5-18-05 Hobbs Corner E-34-4 400 N. Leech



5-18-05 Hobbs Corner E-34-4 400 N. Leech

GPS: Lat + Lon. NAD 27

32° 42. 230 N

103° 08. 527 W

Kristin Farris Pope

From: "Price, Wayne" <WPrice@state.nm.us>
To: "Kristin Farris Pope (E-mail)" <enviro@leaco.net>; "Carolyn Doran Haynes (E-mail)" <riceswd@leaco.net>
Sent: Thursday, May 12, 2005 1:01 PM
Subject: Hobbs System Status

OCD has 37 sites listed as potential for groundwater impact, but are not yet at a work-status to report as a disclosure. We have logged another 40 as final reports that were submitted. The following sites were noted in your 2002 report and we have no record of.

B-3,D-34,E-3-1,E-3,G-3,H-4-1, H-4,
I-33,I-33-1,I-33-2,I-33-3,M-27-1,M27-2,O-21-2,O-34,P-28-2,P-33. What is the status of these sites?

Why did you list the 37 as potential groundwater impact without a disclosure report?

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

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This email has been scanned by the MessageLabs Email Security System.

5/13/2005

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

C O Y

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	B-3	B	3	19S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOC SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

Soil Excavated none cubic yards Excavation Length _____ Width _____ Depth _____ feet

Soil Disposed _____ cubic yards Offsite Facility _____ Location _____

FINAL ANALYTICAL RESULTS: Sample Date _____ Sample Depth _____

Procure 5-point composite sample of bottom and 4-point composite sample of sidewalls. TPH, BTEX and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOC guidelines.

Sample Location	Benzene mg/kg	Toluene mg/kg	Ethyl Benzene mg/kg	Total Xylenes mg/kg	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SIDEWALLS							
BOTTOM							

General Description of Remedial Action: _____

CHLORIDE FIELD TESTS

As per agreement with the City of Hobbs Engineer, all junction boxes

within the city limits of Hobbs will be closed in the following manner:

1. remove all pipe fittings that extend above 2.5' BGS
2. fill vault with sand to the top of the vault
3. spot-weld the manway cover in place for security
4. permanently affix an identification sign to the manway that identifies Rice Operating Company as the responsible party

LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

DATE December 4, 2002 PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

CITY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	E-3	E	3	19S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOC SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

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BOTTOM		

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**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

CCPY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	E-3-1	E	3	19S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

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SIDEWALLS		
BOTTOM		

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COPY

RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	G-3	G	3	19S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits _____

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CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT

COPY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	H-4	H	4	19S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOC SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

Soil Excavated none cubic yards Excavation Length _____ Width _____ Depth _____ feet

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BOTTOM							

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CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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TITLE Project Leader - Environmental

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RICE OPERATING COMPANY JUNCTION BOX FINAL REPORT

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	H-4-1	H	4	19S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

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BOTTOM							

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SIDEWALLS		
BOTTOM		

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SIGNATURE  TITLE Project Leader - Environmental

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

COPY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	Corner H-4	H	4	19S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

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LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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SIGNATURE *[Signature]* TITLE Project Leader - Environmental

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

COPY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	O-21-2	O	21	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

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CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

COPY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	M-27-1	M	27	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

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Soil Disposed _____ cubic yards Offsite Facility _____ Location _____

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SIDEWALLS							
BOTTOM							

General Description of Remedial Action: _____

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LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002 PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT

G. E. Y.

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	M-27-2	M	27	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits _____

Depth to Groundwater _____ <50 _____ feet NMOCD SITE ASSESSMENT RANKING SCORE: _____ 20 _____

Date Started _____ Date Completed 9/1/2002 OCD Witness _____ NO _____

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LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002 PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

COPY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	H-28	H	28	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits _____

Depth to Groundwater _____ <50 _____ feet NMOCD SITE ASSESSMENT RANKING SCORE: _____ 20 _____

Date Started _____ Date Completed 9/1/2002 OCD Witness _____ NO _____

Soil Excavated _____ none _____ cubic yards Excavation Length _____ Width _____ Depth _____ feet

Soil Disposed _____ cubic yards Offsite Facility _____ Location _____

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SIDEWALLS							
BOTTOM							

General Description of Remedial Action: _____

Concrete vault was removed upon instructions of Hobbs City Engineer.

Excavation was backfilled with clean soil and line marker installed.

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	P-28-2	P	28	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

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SIDEWALLS							
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CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

COPY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	H-33	H	33	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

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BOTTOM		

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DATE December 4, 2002 PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

COPY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	I-33	I	33	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

Soil Excavated none cubic yards Excavation Length _____ Width _____ Depth _____ feet

Soil Disposed _____ cubic yards Offsite Facility _____ Location _____

FINAL ANALYTICAL RESULTS: Sample Date _____ Sample Depth _____

Procure 5-point composite sample of bottom and 4-point composite sample of sidewalls. TPH, BTEX and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines.

Sample Location	Benzene mg/kg	Toluene mg/kg	Ethyl Benzene mg/kg	Total Xylenes mg/kg	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SIDEWALLS							
BOTTOM							

General Description of Remedial Action: _____

CHLORIDE FIELD TESTS

As per agreement with the City of Hobbs Engineer, all junction boxes

within the city limits of Hobbs will be closed in the following manner:

1. remove all pipe fittings that extend above 2.5' BGS
2. fill vault with sand to the top of the vault
3. spot-weld the manway cover in place for security
4. permanently affix an identification sign to the manway that identifies Rice Operating Company as the responsible party

LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002 PRINTED NAME D. E. Anderson

SIGNATURE  TITLE Project Leader - Environmental

RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT

C-117

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	I-33-1	I	33	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits _____

Depth to Groundwater _____ <50 _____ feet NMOCD SITE ASSESSMENT RANKING SCORE: _____ 20 _____

Date Started _____ Date Completed 9/1/2002 OCD Witness _____ NO _____

Soil Excavated _____ none _____ cubic yards Excavation Length _____ Width _____ Depth _____ feet

Soil Disposed _____ cubic yards Offsite Facility _____ Location _____

FINAL ANALYTICAL RESULTS: Sample Date _____ Sample Depth _____

Procure 5-point composite sample of bottom and 4-point composite sample of sidewalls. TPH, BTEX and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines.

Sample Location	Benzene mg/kg	Toluene mg/kg	Ethyl Benzene mg/kg	Total Xylenes mg/kg	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SIDEWALLS							
BOTTOM							

General Description of Remedial Action: _____

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CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002 PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT

GLAY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	I-33-2	I	33	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

Soil Excavated none cubic yards Excavation Length _____ Width _____ Depth _____ feet

Soil Disposed _____ cubic yards Offsite Facility _____ Location _____

FINAL ANALYTICAL RESULTS: Sample Date _____ Sample Depth _____

Procure 5-point composite sample of bottom and 4-point composite sample of sidewalls. TPH, BTEX and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines.

Sample Location	Benzene mg/kg	Toluene mg/kg	Ethyl Benzene mg/kg	Total Xylenes mg/kg	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SIDEWALLS							
BOTTOM							

General Description of Remedial Action: _____

CHLORIDE FIELD TESTS

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LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002 PRINTED NAME D. E. Anderson

SIGNATURE *[Signature]* TITLE Project Leader - Environmental

COPY

RICE OPERATING COMPANY JUNCTION BOX FINAL REPORT

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	I-33-3	I	33	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOC SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

Soil Excavated none cubic yards Excavation Length _____ Width _____ Depth _____ feet

Soil Disposed _____ cubic yards Offsite Facility _____ Location _____

FINAL ANALYTICAL RESULTS: Sample Date _____ Sample Depth _____

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SIDEWALLS							
BOTTOM							

General Description of Remedial Action: _____

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CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002 PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT

CITY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	P-33	P	33	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOC SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

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Soil Disposed _____ cubic yards Offsite Facility _____ Location _____

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SIDEWALLS							
BOTTOM							

General Description of Remedial Action: _____

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LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002

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SIGNATURE *D. E. Anderson*

TITLE Project Leader - Environmental

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

COPY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	D-34	D	34	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOC SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

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SIDEWALLS							
BOTTOM							

General Description of Remedial Action: _____

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LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002 PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT

COPY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	O-34	O	34	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits _____

Depth to Groundwater _____ <50 _____ feet NMOCD SITE ASSESSMENT RANKING SCORE: _____ 20 _____

Date Started _____ Date Completed 9/1/2002 OCD Witness _____ NO _____

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Soil Disposed _____ cubic yards Offsite Facility _____ Location _____

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SIDEWALLS							
BOTTOM							

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CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002

PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson*

TITLE Project Leader - Environmental

Kristin Farris Pope

From: "Price, Wayne" <WPrice@state.nm.us>
To: "Kristin Farris Pope (E-mail)" <enviro@leaco.net>; "Carolyn Doran Haynes (E-mail)" <riceswd@leaco.net>
Sent: Thursday, May 12, 2005 1:01 PM
Subject: Hobbs System Status

OCD has 37 sites listed as potential for groundwater impact, but are not yet at a work-status to report as a disclosure. We have logged another 40 as final reports that were submitted. The following sites were noted in your 2002 report and we have no record of.

B-3,D-34,E-3-1,E-3,G-3,H-4-1, H-4,
I-33,I-33-1,I-33-2,I-33-3,M-27-1,M27-2,O-21-2,O-34,P-28-2,P-33. What is the status of these sites?

Why did you list the 37 as potential groundwater impact without a disclosure report?

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

Confidentiality Notice: This e-mail,including all attachments is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review,use,disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. --
This email has been scanned by the MessageLabs Email Security System.

5/13/2005

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

COPY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	B-3	B	3	19S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

Soil Excavated none cubic yards Excavation Length _____ Width _____ Depth _____ feet

Soil Disposed _____ cubic yards Offsite Facility _____ Location _____

FINAL ANALYTICAL RESULTS: Sample Date _____ Sample Depth _____

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Sample Location	Benzene mg/kg	Toluene mg/kg	Ethyl Benzene mg/kg	Total Xylenes mg/kg	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SIDEWALLS							
BOTTOM							

General Description of Remedial Action: _____

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2. fill vault with sand to the top of the vault
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4. permanently affix an identification sign to the manway that identifies Rice Operating Company as the responsible party

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

DATE December 4, 2002 PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

CITY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	E-3	E	3	19S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

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Soil Disposed _____ cubic yards Offsite Facility _____ Location _____

FINAL ANALYTICAL RESULTS: Sample Date _____ Sample Depth _____

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Sample Location	Benzene mg/kg	Toluene mg/kg	Ethyl Benzene mg/kg	Total Xylenes mg/kg	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SIDEWALLS							
BOTTOM							

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CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002 PRINTED NAME D. E. Anderson

SIGNATURE  TITLE Project Leader - Environmental

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

COPY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	E-3-1	E	3	19S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

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SIDEWALLS							
BOTTOM							

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CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002 PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

COPY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	G-3	G	3	19S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits _____

Depth to Groundwater _____ <50 _____ feet NMOCD SITE ASSESSMENT RANKING SCORE: _____ 20 _____

Date Started _____ Date Completed 9/1/2002 OCD Witness _____ NO _____

Soil Excavated _____ none _____ cubic yards Excavation Length _____ Width _____ Depth _____ feet

Soil Disposed _____ cubic yards Offsite Facility _____ Location _____

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SIDEWALLS							
BOTTOM							

General Description of Remedial Action: _____

CHLORIDE FIELD TESTS

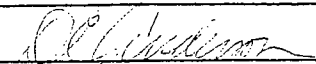
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LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002 PRINTED NAME D. E. Anderson

SIGNATURE  TITLE Project Leader - Environmental

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

COPY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	H-4	H	4	19S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOC SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

Soil Excavated none cubic yards Excavation Length _____ Width _____ Depth _____ feet

Soil Disposed _____ cubic yards Offsite Facility _____ Location _____

FINAL ANALYTICAL RESULTS: Sample Date _____ Sample Depth _____

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SIDEWALLS							
BOTTOM							

General Description of Remedial Action: _____

CHLORIDE FIELD TESTS

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LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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COPY

RICE OPERATING COMPANY JUNCTION BOX FINAL REPORT

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	H-4-1	H	4	19S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

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BOTTOM							

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CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

COPY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	Corner H-4	H	4	19S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

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SIDEWALLS							
BOTTOM							

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LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

DATE December 4, 2002 PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

COPY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	O-21-2	O	21	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOC SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

Soil Excavated none cubic yards Excavation Length _____ Width _____ Depth _____ feet

Soil Disposed _____ cubic yards Offsite Facility _____ Location _____

FINAL ANALYTICAL RESULTS: Sample Date _____ Sample Depth _____

Procure 5-point composite sample of bottom and 4-point composite sample of sidewalls. TPH, BTEX and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOC guidelines.

Sample Location	Benzene mg/kg	Toluene mg/kg	Ethyl Benzene mg/kg	Total Xylenes mg/kg	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SIDEWALLS							
BOTTOM							

General Description of Remedial Action: _____

As per agreement with the City of Hobbs Engineer, all junction boxes within the city limits of Hobbs will be closed in the following manner:

1. remove all pipe fittings that extend above 2.5' BGS
2. fill vault with sand to the top of the vault
3. spot-weld the manway cover in place for security
4. permanently affix an identification sign to the manway that identifies Rice Operating Company as the responsible party

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002

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SIGNATURE *D. E. Anderson*

TITLE Project Leader - Environmental

RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT

COPY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	M-27-1	M	27	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOC SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

Soil Excavated none cubic yards Excavation Length _____ Width _____ Depth _____ feet

Soil Disposed _____ cubic yards Offsite Facility _____ Location _____

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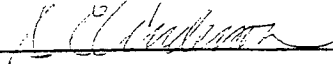
CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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SIGNATURE 

TITLE Project Leader - Environmental

RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT

G E Y

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	M-27-2	M	27	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOC SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

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SIDEWALLS							
BOTTOM							

General Description of Remedial Action: _____

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CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002 PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

COPY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	H-28	H	28	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

Soil Excavated none cubic yards Excavation Length _____ Width _____ Depth _____ feet

Soil Disposed _____ cubic yards Offsite Facility _____ Location _____

FINAL ANALYTICAL RESULTS: Sample Date _____ Sample Depth _____

Procure 5-point composite sample of bottom and 4-point composite sample of sidewalls. TPH, BTEX and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines.

Sample Location	Benzene mg/kg	Toluene mg/kg	Ethyl Benzene mg/kg	Total Xylenes mg/kg	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SIDEWALLS							
BOTTOM							

General Description of Remedial Action: _____

Concrete vault was removed upon instructions of Hobbs City Engineer.

Excavation was backfilled with clean soil and line marker installed.

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002 PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	P-28-2	P	28	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits _____

Depth to Groundwater _____ <50 _____ feet NMOC SITE ASSESSMENT RANKING SCORE: _____ 20 _____

Date Started _____ Date Completed 9/1/2002 OCD Witness _____ NO _____

Soil Excavated _____ none _____ cubic yards Excavation Length _____ Width _____ Depth _____ feet

Soil Disposed _____ cubic yards Offsite Facility _____ Location _____

FINAL ANALYTICAL RESULTS: Sample Date _____ Sample Depth _____

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Sample Location	Benzene mg/kg	Toluene mg/kg	Ethyl Benzene mg/kg	Total Xylenes mg/kg	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SIDEWALLS							
BOTTOM							

General Description of Remedial Action: _____

As per agreement with the City of Hobbs Engineer, all junction boxes

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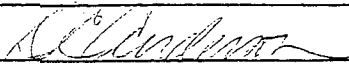
1. remove all pipe fittings that extend above 2.5' BGS
2. fill vault with sand to the top of the vault
3. spot-weld the manway cover in place for security
4. permanently affix an identification sign to the manway that identifies Rice Operating Company as the responsible party

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002 PRINTED NAME D. E. Anderson

SIGNATURE  TITLE Project Leader - Environmental

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

COPY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	H-33	H	33	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

Soil Excavated none cubic yards Excavation Length _____ Width _____ Depth _____ feet

Soil Disposed _____ cubic yards Offsite Facility _____ Location _____

FINAL ANALYTICAL RESULTS: Sample Date _____ Sample Depth _____

Procure 5-point composite sample of bottom and 4-point composite sample of sidewalls. TPH, BTEX and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines.

Sample Location	Benzene mg/kg	Toluene mg/kg	Ethyl Benzene mg/kg	Total Xylenes mg/kg	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SIDEWALLS							
BOTTOM							

General Description of Remedial Action: _____

CHLORIDE FIELD TESTS

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LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

COPY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	I-33	I	33	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits _____

Depth to Groundwater _____ <50 _____ feet NMOC SITE ASSESSMENT RANKING SCORE: _____ 20 _____

Date Started _____ Date Completed 9/1/2002 OCD Witness _____ NO _____

Soil Excavated _____ none _____ cubic yards Excavation Length _____ Width _____ Depth _____ feet

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SIDEWALLS							
BOTTOM							

General Description of Remedial Action: _____

CHLORIDE FIELD TESTS

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LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002 PRINTED NAME D. E. Anderson

SIGNATURE *[Signature]* TITLE Project Leader - Environmental

RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT

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BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	I-33-1	I	33	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits _____

Depth to Groundwater <50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

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SIDEWALLS							
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CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002 PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT

G-1-Y

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	I-33-2	I	33	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

Soil Excavated none cubic yards Excavation Length _____ Width _____ Depth _____ feet

Soil Disposed _____ cubic yards Offsite Facility _____ Location _____

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Sample Location	Benzene mg/kg	Toluene mg/kg	Ethyl Benzene mg/kg	Total Xylenes mg/kg	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SIDEWALLS							
BOTTOM							

General Description of Remedial Action: _____

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LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002 PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

COPY

RICE OPERATING COMPANY JUNCTION BOX FINAL REPORT

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	I-33-3	I	33	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started _____ Date Completed 9/1/2002 OCD Witness NO

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SIDEWALLS							
BOTTOM							

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LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	P-33	P	33	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

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LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002

PRINTED NAME D. E. Anderson

SIGNATURE *[Signature]*

TITLE Project Leader - Environmental

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

COPY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	D-34	D	34	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits

Depth to Groundwater <50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

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LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002 PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson* TITLE Project Leader - Environmental

RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT

CLAY

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Hobbs	O-34	O	34	18S	38E	LEA	Length	Width	Depth

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER _____ OTHER Within City Limits _____

Depth to Groundwater _____ <50 _____ feet NMOC SITE ASSESSMENT RANKING SCORE: _____ 20

Date Started _____ Date Completed 9/1/2002 OCD Witness _____ NO

Soil Excavated _____ none _____ cubic yards Excavation Length _____ Width _____ Depth _____ feet

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CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
SIDEWALLS		
BOTTOM		

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DATE December 4, 2002

PRINTED NAME D. E. Anderson

SIGNATURE *D. E. Anderson*

TITLE Project Leader - Environmental

Price, Wayne

From: Price, Wayne
Sent: Thursday, May 12, 2005 8:15 AM
To: Kristin Farris Pope (E-mail)
Subject: Hobbs abandonment

The OCD had originally placed this system under OCD 1R0414. It is now 1R0428.

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

Price, Wayne

From: Price, Wayne
Sent: Thursday, May 12, 2005 1:02 PM
To: Kristin Farris Pope (E-mail); Carolyn Doran Haynes (E-mail)
Subject: Hobbs System Status

OCD has 37 sites listed as potential for groundwater impact, but are not yet at a work-status to report as a disclosure. We have logged another 40 as final reports that were submitted. The following sites were noted in your 2002 report and we have no record of.

B-3,D-34,E-3-1,E-3,G-3,H-4-1, H-4, I-33,I-33-1,I-33-2,I-33-3,M-27-1,M27-2,O-21-2,O-34,P-28-2,P-33. What is the status of these sites?

Why did you list the 37 as potential groundwater impact without a disclosure report?

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

RICE Operating Company

Cumulative Junction Box Disclosures: Potential Groundwater Impact

These junction box sites have become "disclosure" rather than "closure" sites because significant TPH or salt impact has deemed the site remediation to be outside the scope of the Rice Operating Company Generic Junction Box Plan. Each of these sites has the potential for groundwater impact, based on delineation results. As noted, some of the sites are confirmed to have groundwater impact and have been officially reported to the NMOCD and are being monitored for groundwater quality. These sites are being evaluated for risk-based corrective action and plans will be submitted to the NMOCD.

Location	SWD System	Unit Letter	Legal Description	Feet to GW	Monitor Well	Landowner	Comments	Date Disclosed	Status
Jct. N-5	EME	N	Sec 5, T20S, R37E	34	Yes	BLM	Notified of GW impact	1/18/2002	Low
Jct. M-16-1	EME	M	Sec 16, T20S, R37E	20	Yes	NM	Notified of GW impact	1/18/2002	Low
Jct. K-33-1	EME	K	Sec 33, T19S, R37E	37	Yes	Sarah Phillips	Notified of GW impact	1/18/2002	Medium
Jct. A-20	EME	A	Sec 20, T20S, R37E	25	Yes	NM	Notified of GW impact	1/29/2002	Medium
Jct. K-6	EME	K	Sec 6, T20S, R37E	37	Yes	BLM	Notified of GW impact	2/4/2002	Low
Jct. H-20	EME	H	Sec 20, T20S, R37E	<50		State		4/15/2002	Low
Jct. D-3	EME	D	Sec 3, T20S, R37E	<50		Jimmie T. Cooper		5/17/2002	Low
I-1 SWD	EME	I	Sec 1, T20S, R36E	32		NM	Redwood tank/pit remediation	1/24/2003	ACTIVE
Jct. O-24	EME	O	Sec 24, T20S, R36E	35 or 100		Dale Cooper	Aquifer fault line	1/31/2003	Low
Jct. D-25	EME	D	Sec 25, T20S, R36E	68		Dale Cooper		1/31/2003	Low
Jct. O-33	EME	O	Sec 33, T19S, R37E	<50		Joe Ray Williams		1/31/2003	Medium
Marathon Barber EOL	EME	E	Sec 5, T20S, R37E	40	Yes	James Barber Est.	Notified of GW impact	1/31/2003	Low
P-13 EOL	EME	P	Sec 13, T19S, R36E	51		El Paso Nat. Gas		1/31/2003	Medium
Jct. H-10	EME	H	Sec 10, T20S, R36E	31		G. & H. Klein	Cl- impacted to >= 16'; clay liner	2/24/2003	Low
Jct. J-10	EME	J	Sec 10, T20S, R36E	31		G. & H. Klein	Cl- impacted to >= 17'; poly liner	2/24/2003	Low
Jct. G-11	EME	G	Sec 11, T20S, R36E	31		F. G., & H. Klein	TPH & cl- impacted to >= 18'; will install poly liner	2/24/2003	Medium
Jct. K-35	EME	K	Sec 35, T20S, R36E	122		Tuffy Cooper		3/4/2003	Low
GM State EOL	EME	H	Sec 2, T21S, R35E	53		Merchant Cattle Co.			
Jct. O-19	EME	O	Sec 19, T20S, R37E	23		NM	cl- impact => 12' bgs	4/1/2003	Operator Responsible
C-2 boot	EME	C	Sec 2, T20S, R36E	50		NM	cl- impact => 12' bgs	4/1/2003	High
L-6 boot	EME	L	Sec 6, T20S, R37E	35		Chevron Texaco	Cl- impact did not sufficiently decline TPH & Cl- impact >= 12 ft	6/27/2003	CLOSED after further evaluation
P-27 EOL	EME	P	Sec 27, T20S, R36E	107		NM	Cl- impact > 12 ft	7/16/2003	High
Jct. G-19	EME	G	Sec 19, T19S, R37E	58		Jimmy T. Cooper	TPH impact did not sufficiently decline	7/23/2003	Low
M-35-2 Boot	EME	M	Sec 35, T19S, R36E	70		DLD Corp.	Cl- impact >= 12 ft	7/31/2003	Low
Jct. E-35	EME	E	Sec 35, T20S, R36E	122		Tuffy Cooper	Cl- impact >= 12 ft	8/14/2003	Medium
Jct. L-34	EME	L	Sec 34, T20S, R36E	122		Tuffy Cooper	Cl- impact >= 12 ft	8/14/2003	CLOSED after further evaluation
Jct. L-20	EME	L	Sec 20, T20S, R37E	23		NM	TPH impact > 12 ft	8/26/2003	Low
Sarah Phillips EOL	EME	K	Sec 33, T19S, R37E	33		Sarah Phillips	Cl- impact > 14 ft	11/6/2003	Status Pending
Oil & Gas Oper. St. 'H' EOL	EME	E	Sec 17, T20S, R37E	27		NM	Cl- impact > 14 ft	11/7/2003	Low
A' 20 EOL	EME	J	Sec 20, T20S, R37E	22		NM	TPH impact > 14 ft	12/3/2003	High
Jct. N-11	EME	N	Sec 11, T21S, R36E	200		NM	Cl- impact > 80 ft	1/9/2004	Producer Will Remediate
Jct. C-33	EME	C	Sec 33, T20S, R36E	170		Dale Cooper	Cl- impact > 75 ft	1/14/2004	Low
Phillips 'A' EOL	EME	N	Sec 31, T19S, R37E	23		Charlie Byrd	Cl- impact did not sufficiently decline	3/19/2004	CLOSED after further evaluation
Jct. B-7	EME	B	Sec 7, T20S, R37E	36		Jimmie T. Cooper	TPH guidelines not met, inside ROC pump station	4/7/2004	High
Jct. E-2	EME	E	Sec 2, T20S, R37E	21		NM	TPH guidelines not met	8/13/2004	Low
Britt EOL	EME	D	Sec 18, T20S, R37E	30		Jimmie T. Cooper	TPH guidelines not met	8/27/2004	Producer Will Remediate
JR Phillips boot EOL	EME	D	Sec 6, T20S, R37E	35		Charlie Byrd		9/6/2004	High
Jct. G-18	EME	G	Sec 18, T20S, R37E	52		NM	TPH guidelines not met	9/15/2004	Low
Jct. J-1	EME	J	Sec 1, T20S, R36E	40		NM	Cl- impact did not sufficiently decline	10/15/2004	High
Jct. F-18	EME	F	Sec 18, T20S, R37E	30		Jimmie T. Cooper	Cl- impact did not sufficiently decline	10/19/2004	High

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jct. N-18	EME	N	Sec. 18, T20S, R37E	35		Jimmie T. Cooper	Cl- impact did not sufficiently decline	10/20/2004	High
K-9 vent	EME	K	Sec. 9, T20S, R37E	18		S & W Cattle Co.		10/29/2004	High
Gaither boot	EME	I	Sec. 34, T19S, R36E	50.73		G. P. Sims		11/8/2004	High
jct. I-13	EME	I	Sec. 13, T20S, R36E	35		NM	Cl- impact > 12 ft	11/24/2004	High
N-18 boot	EME	N	Sec. 18, T20S, R37E	35		Jimmie T. Cooper	Cl- impact	12/6/2004	High
SEMU EOL	EME	P	Sec. 15, T20S, R37E	78		S & W Cattle Co.	Cl- & TPH impact	12/29/2004	Medium
jct. D-1 leak	EME	D	Sec. 1, T20S, R36E	31	yes	NM	Notified of GW impact	1/5/2005	ACTIVE
jct. N-4-1	EME	N	Sec. 4, T20S, R37E	31		Elsie Reeves	sample stock well bi-annually	1/19/2005	ACTIVE
L-15-1 vent	EME	L	Sec. 15, T20S, R37E	17		S & W Cattle Co.	Cl- & TPH impact	2/2/2005	High
Anerada JR Phillips EOL	EME	H	Sec. 1, T20S, R36E	40		Charlie Byrd	TPH impact	4/29/2005	High
Conoco A-17 EOL	EME	M	Sec. 17, T19S, R37E	59		NM	TPH impact	5/4/2005	High
Zachary Hinton EOL	BD	O	Sec 12, T22S, R37E	56	Yes	Leo V. Sims	Notified of GW impact	3/2/2002	ACTIVE - CAP submitted to OCD
Jct. J-26	BD	J	Sec 26, T21S, R37E	45	Yes	Delrose Scott	Excavated, remediated, Notified of GW impact	12/13/2002	ACTIVE
Jct. F-17	BD	F	Sec 17, T21S, R37E	75	Yes	Millard Deck Est.	Notified of GW impact	12/13/2002	Medium
Jct. I-27	BD	I	Sec 27, T21S, R37E	45		City of Eunice	Notified of GW impact	12/13/2002	High
Jct. N-29	BD	N	Sec 29, T21S, R37E	90		Tom Kennam	Notified of GW impact	1/9/2003	Workplan approved by OCD; landowner issues
Jct. H-3-1	BD	H	Sec 3, T22S, R37E	27		Varsada Gas Pr.Llc		1/31/2003	Low
Jct. H-3	BD	H	Sec 3, T22S, R37E	27		Varsada Gas Pr.Llc		1/31/2003	Low
Jct. G-3	BD	G	Sec 3, T22S, R37E	45		Varsada Gas Pr.Llc		1/31/2003	Low
G-16 EOL	BD	G	Sec 16, T22S, R37E	82		NM		1/31/2003	Low
G-16 Vent	BD	G	Sec 16, T22S, R37E	82		NM		1/31/2003	Medium
Jct. B-16	BD	B	Sec 16, T22S, R37E	82		NM		1/31/2003	Medium
Jct. O-17-1	BD	O	Sec 17, T21S, R37E	72		Millard Deck Estate	TPH impact >= 12' bgs	1/31/2003	High
jct. M-26-1	BD	M	Sec 26, T21S, R37E	40		Delrose Scott	TPH impact >= 12' bgs	3/17/2003	High
jct. F-29	BD	F	Sec 29, T21S, R37E	86		Millard Deck Estate	Cl- impact >= 14' bgs	3/26/2003	Medium
jct. F-29-1	BD	F	Sec 29, T21S, R37E	86		Millard Deck Estate	Cl- impact >= 14' bgs	3/26/2003	Low
jct. I-8	BD	I	Sec 8, T22S, R37E	71		Lucy Flowers	cl- impact >= 16' bgs	4/1/2003	Medium
Matter 5 EOL	BD	I	Sec 18, T21S, R37E	72		Nymeyer Property	TPH & Cl- impact >= 12 ft	4/16/2003	Medium
Grizzel EOL	BD	G	Sec 8, T22S, R37E	75		Lucy Flowers	cl- impact >= 12' bgs	4/22/2003	Medium
jct. F-3	BD	F	Sec 3, T22S, R37E	93		Bill Stevens	cl- impact >= 13' bgs	4/22/2003	Low
jct. E-3	BD	E	Sec 3, T22S, R37E	93		Bill Stevens	Bored to grdwtr, cl- impacted	4/22/2003	Low
Brunson EOL	BD	P	Sec 4, T22S, R37E	93		Priscilla West (Brunson Moody)	cl- impact >= 12' bgs	4/30/2003	Medium
jct. M-14	BD	M	Sec 14, T21S, R37E	28		Charles Bettis	cl- impact >= 12' bgs	4/30/2003	ACTIVE - Plan submitted to OCD
Hardy EOL	BD	K	Sec 20, T21S, R37E	99		Millard Deck	TPH & Cl- impact > 13' bgs	5/9/2003	Medium
jct. K-27 North	BD	K	Sec 27, T21S, R37E	45		James Gardener	TPH & cl' impact >= 12' bgs	6/2/2003	ACTIVE - Plan submitted to OCD
jct. K-27-1	BD	K	Sec 27, T21S, R37E	45		James Gardener	Cl- impact >= 12' bgs	6/10/2003	ACTIVE - Plan submitted to OCD
H-19 vent	BD	H	Sec 19, T21S, R37E	99		Joc Robin Sims	Cl- impact >= 12 ft	7/16/2003	High
K-20-1 Vent	BD	K	Sec 20, T21S, R37E	99		Millard Deck Estate	vertical & lateral cl- impact	7/28/2003	CLOSED after further evaluation
jct. K-20-2	BD	K	Sec 20, T21S, R37E	99		Millard Deck Estate	vertical & lateral cl- impact	7/28/2003	Low
Lee EOL	BD	C	Sec 23, T21S, R37E	99		Millard Deck Estate	Cl- did not sufficiently decline with depth	7/31/2003	Low
O-23-1 vent	BD	O	Sec 23, T21S, R37E	65		Delrose Scott	Cl- > 12 ft BGS	5/12/2004	Medium
O-23 vent	BD	O	Sec 23, T21S, R37E	65		Delrose Scott	Cl- > 12 ft BGS	5/26/2004	Medium
H-14 Boot	BD	H	Sec 14, T22S, R37E	65		Leo V. Sims	cluster of 3 boxes; Cl- > 12 ft BGS	7/16/2004	High
Jct. H-14-1	BD	H	Sec 14, T22S, R37E	65		Leo V. Sims		7/19/2004	High
Jct. H-14-2	BD	H	Sec 14, T22S, R37E	65		Leo V. Sims		7/19/2004	High
Jct. N-16 'A'	BD	N	Sec 16, T21S, R37E	65		NM	Cl- inconclusive to 55 ft BGS	8/4/2004	Low
Jct. P-26-2	BD	P	Sec 26, T21S, R37E	45		Delrose Scott		8/25/2004	Medium
jct. C-4-3	BD	C	Sec 4, T22S, R37E	93		Priscilla West (Brunson Moody)	TPH guidelines not met	9/15/2004	High

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jct. B-25	BD	B	Sec 25, T21S, R37E	37		Patricia House		11/4/2004	High
P-26-1 vent	BD	P	Sec 26, T21S, R37E	40		Delrose Scott		11/16/2004	High
H-35 pit	BD	H	Sec 35, T22S, R37E	42		Chloe Sims	chloride impact	12/3/2004	ACTIVE
jct. F-25-1	BD	F	Sec 25, T21S, R37E	38		Mark Owen Estate	chloride impact	3/9/2005	High
jct. F-25-2	BD	F	Sec 25, T21S, R37E	37		Mark Owen Estate	chloride impact	4/15/2005	High
E-20 vent	BD	E	Sec 20, T21S, R37E	99		Millard Deck Estate	chloride impact	4/29/2005	Low
jct. E-26	Justis	E	Sec 26, T24S, R37E	89		Rebecca Doom	Cl- & TPH impact	6/30/2003	Medium
jct. L-26	Justis	L	Sec 26, T24S, R37E	89		Rebecca Doom	Cl- impact did not sufficiently decline	7/1/2003	Medium
jct. L-1	Justis	L	Sec 1, T25S, R37E	75	yes	Joyce Willis		1/9/2004	ACTIVE
jct. E-1	Justis	E	Sec 1, T25S, R37E	75		Joyce Willis	Cl- impact did not sufficiently decline	3/19/2004	Medium
D-1 vent	Justis	D	Sec 1, T25S, R37E	75		Joyce Willis	Cl- & TPH impact	1/24/2005	Medium
D-1 vent	Justis	D	Sec 1, T25S, R37E	184		George Willis	Cl- & TPH impact	5/11/2005	Low
F-35 SWD	Vacuum	F	Sec 35, T17S, R35E	55	yes	NM		1/18/2002	ACTIVE
G-35 SWD	Vacuum	G	Sec 35, T17S, R35E	50	yes	NM		1/18/2002	ACTIVE - Plan submitted to OCD
K-35-1 boot	Vacuum	K	Sec 35, T17S, R35E	54		NM	cl- impact	11/29/2004	
jct. E-2	Vacuum	E	Sec 35, T17S, R35E	52		NM		11/29/2004	

Location	SWD System	Unit Letter	Legal Description	Feet to GW	Monitor Well	Landowner	Comments	Date Disclosed	Status
46 ✓ F-24-3 Vent 44	Hobbs	F	Sec 24, T18S, R37E	<50		NM	Initial evaluation only	1/31/2003	
47 ✓ F-25 EOL 47	Hobbs	F	Sec 25, T18S, R37E	<50		NM	Initial evaluation only	1/31/2003	
48 ✓ M-20 Vent 48	Hobbs	M	Sec 20, T18S, R38E	<50		Samuel Bruton	Initial evaluation only	1/31/2003	
49 ✓ E-29 Vent 49	Hobbs	E	Sec 29, T18S, R38E	<50		Oxy Permian	Initial evaluation only	1/31/2003	
50 ✓ I-29 EOL Boot 50	Hobbs	I	Sec 29, T18S, R38E	<50		Oxy Permian	Initial evaluation only	1/31/2003	ACTIVE - Plan submitted to OCD
51 ✓ K-29 EOL Boot 51	Hobbs	K	Sec 29, T18S, R38E	<50		Oxy Permian	Initial evaluation only	1/31/2003	ACTIVE - Plan submitted to OCD
52 ✓ O-29 EOL 52	Hobbs	O	Sec 29, T18S, R38E	<50		Oxy Permian	Initial evaluation only	1/31/2003	ACTIVE - Plan submitted to OCD
53 ✓ O-29-1 Vent 53	Hobbs	O	Sec 29, T18S, R38E	<50		Oxy Permian	Initial evaluation only	1/31/2003	ACTIVE - Plan submitted to OCD
54 ✓ P-29 Vent 54	Hobbs	P	Sec 29, T18S, R38E	<50		Oxy Permian	Initial evaluation only	1/31/2003	
55 ✓ C-30 Vent 55	Hobbs	C	Sec 30, T18S, R38E	<50		James Hanson	Initial evaluation only	1/31/2003	
56 ✓ Jct. F-31-1 56	Hobbs	F	Sec 31, T18S, R38E	<50		V. R. Jones	Initial evaluation only	1/31/2003	
57 ✓ Jct. F-31-2 57	Hobbs	F	Sec 31, T18S, R38E	<50		V. R. Jones	Initial evaluation only	1/31/2003	
58 ✓ B-32 Boot 58	Hobbs	B	Sec 32, T18S, R38E	<50		Oxy Permian	Initial evaluation only	1/31/2003	
59 ✓ F-33 Vent 59	Hobbs	F	Sec 33, T18S, R38E	<50		NM	Initial evaluation only	1/31/2003	
60 ✓ A-6 Vent 60	Hobbs	A	Sec 6, T19S, R38E	<50		NM	Initial evaluation only	1/31/2003	
61 ✓ Jct. A-25 61	Hobbs	A	Sec 25, T18S, R37E	<50		NM	Initial evaluation only	1/31/2003	
62 ✓ Jct. P-31 62	Hobbs	P	Sec 31, T18S, R38E	<50		Kress Jones	Initial evaluation only	1/31/2003	
63 ✓ Jct. F-24-1 63	Hobbs	F	Sec 24, T18S, R37E	<50		NM	Primary Delineation only	1/31/2003	
64 ✓ Jct. F-29-1A 64	Hobbs	F	Sec 29, T18S, R38E	57	yes	Oxy Permian	Primary Delineation only; 2 MWs (dual completion)	1/31/2003	
65 ✓ Jct. F-29-1B (G-29) 65	Hobbs	F	Sec 29, T18S, R38E	<50		Oxy Permian	Primary Delineation only	1/31/2003	
66 ✓ I-29 Vent 66	Hobbs	I	Sec 29, T18S, R38E	65	yes	Oxy Permian	Primary Delineation only; GW < WQCC standards	1/31/2003	ACTIVE - Plan submitted to OCD
67 ✓ F-30 Vent 67	Hobbs	F	Sec 30, T18S, R38E	<50		James Hanson et ux	Primary Delineation only	1/31/2003	
68 ✓ Jct. L-30 68	Hobbs	L	Sec 30, T18S, R38E	<50		NM	Primary Delineation only	1/31/2003	
69 ✓ Jct. E-32-1 69	Hobbs	E	Sec 32, T18S, R38E	<50		Oxy Permian	Primary Delineation only	1/31/2003	
70 ✓ Jct. E-32-2 70	Hobbs	E	Sec 32, T18S, R38E	<50		Oxy Permian	Primary Delineation only	1/31/2003	
71 ✓ Jct. E-33-1 71	Hobbs	E	Sec 33, T18S, R38E	<50		NM	Primary Delineation only	1/31/2003	
72 ✓ Jct. N-4 72	Hobbs	N	Sec 4, T19S, R38E	<50		NM	Primary Delineation only	1/31/2003	
73 ✓ O-5 Vent 73	Hobbs	O	Sec 5, T19S, R38E	<50		Dee Cochran	Historical Line Leak	1/31/2003	
74 ✓ Jct. H-29 74	Hobbs	H	Sec 29, T18S, R38E	<50		Sage & Cottrell	Primary Delineation only	1/31/2003	
75 ✓ Jct. E-4 75	Hobbs	E	Sec 4, T19S, R38E	<50		NM	Primary Delineation only	1/31/2003	
76 ✓ Jct. O-13 (N) 76	Hobbs	O	Sec 13, T18S, R37E	<50		Charles Seed Trst	Primary Delineation only	1/31/2003	
77 ✓ G-9 Vent 77	Hobbs	G	Sec 9, T19S, R38E	<50		NM	Primary Delineation only	1/31/2003	
78 ✓ Jct. A-6 78	Hobbs	A	Sec 6, T19S, R38E	<50		NM	Primary Delineation only	1/31/2003	
79 ✓ Jct. E-33-2 79	Hobbs	E	Sec 33, T18S, R38E	<50		NM	Primary Delineation only	1/31/2003	
80 ✓ vent M-4 80	Hobbs	M	Sec. 4, T19S, R38E	<50		J. A. Desoto	Initial evaluation only	9/11/2003	

These Hobbs SWD System junction boxes, which have potential for groundwater impact, are not yet at a work-status to report as a disclosure. The Hobbs SWD System Environmental Committee has directed Rice Operating Company to prioritize the sites according to vadose zone and groundwater receptors, NMOCD score, landowner, surface use, etc. in order to coordinate the most effective and timely use of resources. The Hobbs SWD System Environmental Committee is committed to completing the abandonment of the Hobbs SWD Gathering System, and projects the remediation of these junction box sites to be a long-term endeavor, possibly 7-10 years. Each of these sites have significant TPH and salt impact and are deemed to be outside the scope of the Rice Operating Company Generic Junction Box Plan. As sites are prioritized, work plans will be developed and submitted to the NMOCD for review, feedback and approval.

Price, Wayne

From: Price, Wayne
Sent: Wednesday, May 11, 2005 4:03 PM
To: 'Kristin Farris Pope'
Subject: RE: Case #

Question? How did you determine these sites were disclosure rather than final?

-----Original Message-----

From: Kristin Farris Pope [mailto:enviro@leaco.net]
Sent: Wednesday, May 11, 2005 4:01 PM
To: Price, Wayne
Subject: Re: Case #

Cut and paste from previous email to you today:

No, disclosure reports have not been submitted for those sites. The Hobbs Abandonment sites were included in the very first list of potential groundwater impacts sent to OCD. Most of these sites have not had any excavation yet.

Kristin

----- Original Message -----

From: Price, Wayne
To: 'Kristin Farris Pope'
Sent: Wednesday, May 11, 2005 3:56 PM
Subject: RE: Case #

Your right it is 1R0426-14.

Also has Rice submitted the 36 disclosure reports (RED Cover) for the Hobbs Abandonment project.? did receive the 40 final reports (green cover) and have logged those in our data base system.

-----Original Message-----

From: Kristin Farris Pope [mailto:enviro@leaco.net]
Sent: Wednesday, May 11, 2005 3:40 PM
To: Wayne Price
Subject: Case #

Wayne:

My records indicate that BD jct. F-17 (has 1 MW) was assigned an OCD Case# 1R0426-14. The 5/5/05 letter from D. Sanchez has it listed as 1R0426-33.

Can you look into this? Thanks.

Kristin Farris Pope
Project Scientist
RICE Operating Company
Hobbs, NM 88240
(505) 393-9174

5/12/2005

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Subject: Case #

Wayne:

My records indicate that BD jct. F-17 (has 1 MW) was assigned an OCD Case# 1R0426-14. The 5/5/05 letter from D. Sanchez has it listed as 1R0426-33.

Can you look into this? Thanks.

Kristin Farris Pope
Project Scientist
RICE Operating Company
Hobbs, NM 88240
(505) 393-9174

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5/12/2005

Price, Wayne

From: Kristin Farris Pope [enviro@leaco.net]
Sent: Wednesday, May 11, 2005 11:12 AM
To: Price, Wayne
Cc: Carolyn Haynes
Subject: Re: Hobbs Jct F-29-1A and I-29 Vent

No, disclosure reports have not been submitted for those sites. The Hobbs Abandonment sites were included in the very first list of potential groundwater impacts sent to OCD. Most of these sites have not had any excavation.

Kristin Pope

----- Original Message -----

From: "Price, Wayne" <WPrice@state.nm.us>
To: "Carolyn Doran Haynes (E-mail)" <riceswd@leaco.net>; "Kristin Farris Pope (E-mail)" <enviro@leaco.net>
Sent: Wednesday, May 11, 2005 11:00 AM
Subject: Hobbs Jct F-29-1A and I-29 Vent

> Did Rice submit Disclosure reports for these sites or just Groundwater
> impact notice?

>

> 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

>

>

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Price, Wayne

From: Carolyn Doran Haynes [cdhriceswd@leaco.net]
Sent: Monday, November 29, 2004 4:02 PM
To: 'Price, Wayne'
Cc: R@rthicksconsult.com; 'Kristin Farris'
Subject: FW: Hobbs SWD System Abandonment

Wayne,

I think you mentioned to Kristin that you didn't remember a request for a 4-year plan for the Hobbs sites. I'm forwarding to you the email and letter I first submitted to you by email in January. I remembered asking you about it just before Randy Hicks submitted the workplan for the 4 sites, like maybe in May (?). If you have questions, please don't hesitate to call. I'm looking forward to our call on Wed. Carolyn

From: Carolyn Doran Haynes [mailto:cdhriceswd@leaco.net]
Sent: Friday, January 16, 2004 5:04 PM
To: Wayne Price
Cc: Roger Anderson; Randall Hicks
Subject: Hobbs SWD System Abandonment

Dear Wayne,

Please consider this proposal for ROC. ROC and System Partners are ready to proceed with the 36 sites of potential GW impact and it was agreed at the December System Partner meeting that proceeding requires a timeline concurrence from OCD.

Randy Hicks is already working on 4 sites for RBCA plans.

Thank you,

Carolyn

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11/30/2004

RICE *Operating Company*

122 West Taylor • Hobbs, NM 88240
Phone: (505) 393-9174 • Fax: (505) 397-1471

January 16, 2004

Certified Mail Return Receipt No.
7002 2410 0000 4940 1107

Mr. Wayne Price
NM Energy, Minerals and Natural Resources Department
Oil Conservation Division, Environmental Bureau
1220 S. St. Francis Drive
Santa Fe, NM 87504

Re: Hobbs SWD System Abandonment
Potential Groundwater-Impacted Junction Box Sites

Dear Mr. Price:

Rice Operating Company (ROC) is in the process of abandoning the Hobbs Salt Water Disposal System, which had been operated by ROC since 1958. The Hobbs SWD System is owned by a consortium of oil producers, System Partners, who provided operating capital and now abandonment capital based on percent ownership. (ROC has no ownership of pipelines, wells, or facilities of the Hobbs SWD System.) This abandonment project requires System Partner AFE approval and pre-work funding.

Through the course of the pipeline and junction box abandonment activities, ROC submitted to the NMOCD a list of 36 junction box sites that exhibited some evidence of potential groundwater impact. These sites could not be closed within the scope of the ROC "Revised Junction Box Upgrade Plan" because of the potential extent of the impact and economics of remediating to a closure status. The ROC "Revised Junction Box Upgrade Plan" recognizes sites that are: "outside the scope of this work plan and will become a risk-based corrective action (RBCA) project-site."

ROC has secured these sites by backfilling the delineation excavation, recording Global Positioning System-defined coordinates (GPS), and implanting a steel identification plate in the center of the site (insures exact re-location of the impact area). In accordance with the "Revised Junction Box Upgrade Plan" each of these 36 sites have been evaluated and prioritized by the Hobbs SWD System Environmental Committee with the intention that individual work plans will be submitted in due course to the NMOCD.

The Hobbs SWD System Partners have directed ROC to propose to the NMOCD that these 36 sites undergo further characterization and if warranted, remediation under an abandonment work plan that encompasses four (4) years. The four-year work plan proposal is supported by several points: the impact will not be compounded because the Hobbs SWD System is completely inactive; each site has been secured for safety and re-location of impact; and logistically, remediation of 9 sites per year is optimistic but possible considering both manpower and economics. A Risk-Based Corrective Action (RBCA) Plan will be developed and submitted for

NMOCD approval for each individual site based on site-specific assessment and impact parameters.

ROC and the Hobbs SWD System Partners have retained RT Hicks Consultants of Albuquerque, NM to initiate the development of RBCA Plans for four (4) of these sites. It is expected that the RBCA plans for these four sites will be submitted to the NMOCD by March 1, 2004. The remaining plans for five more sites for 2004 will be developed later in the year and will undoubtedly reflect the conditions/approval reached for these first four site plans.

As always, NMOCD will be notified in advance by email of work schedule and timing of significant events and will be consulted throughout the work plan process for concurrence of any significant plan alterations, analytical interpretations, etc. NMOCD will be given specific advance notice of sites located within a city limits or ¼ mile from a residence, business, school, public water source, etc. Work plan activities and results at any of these sites will be immediately communicated to the Santa Fe NMOCD office for concurrence or conditions of strategy.

Thank you for your consideration of this proposal for a 4-year plan to remediate the remaining 36 impacted sites of the Hobbs SWD System pipeline and junction box abandonment. ROC also thanks NMOCD for acknowledging issues ROC faces with landowners, System Partners and operations of an aging infrastructure. We look forward to hearing from you soon. If there are any additional questions, please contact me at the above phone number.

Carolyn Doran Haynes
Engineering Manager

Attachments

cc: LBG, SC, file
RT Hicks
NMOCD: Roger Anderson

Price, Wayne

From: Carolyn Doran Haynes [cdhriceswd@leaco.net]
Sent: Wednesday, November 24, 2004 2:22 PM
To: 'Price, Wayne'
Cc: 'Kristin Farris'
Subject: FW: Rice Projects

Wayne,

Please scroll down and read my responses imbedded in your email. They are in red.

-----Original Message-----

From: Rice Operating [mailto:riceswd@leaco.net]
Sent: Wednesday, November 24, 2004 11:47 AM
To: Haynes, Carolyn Doran
Subject: Fw: Rice Projects

----- Original Message -----

From: "Price, Wayne" <WPrice@state.nm.us>
To: "Carolyn Doran Haynes (E-mail)" <riceswd@leaco.net>; "Kristin Farris Pope (E-mail)" <enviro@leaco.net>
Sent: Wednesday, November 24, 2004 10:32 AM
Subject: Rice Projects

> Dear Carolyn:

>

> The first thing I want to do is compliment Kristin on the good job she is
 > doing on filing, processing and maintaining records on all of your
 > projects.
 > Excellent work!

Thank you!

>

> The next item is a question. Which ROC projects are not under the generic
 > Jct plan or Redwood Tank closure? Are you using the Jct Box plan for
 > redwood tank and leak sites also? I understand that EME and DB projects
 > are all under the generic Jct plan approved on July 22, 2003 by OCD. I also
 > understand that disclosure reports from these projects are covered on a
 > case-by-case basis. So how is the Hobbs SWD and other ROC systems being
 > handled? Please clarify.

The Junction Box Plan is just that, a junction box plan, for all of the Systems. The reason most reports are for EME and BD is because they are the Systems with the most activity (due to barrels disposed and dollars ROC can AFE.) The Hobbs SWD project is for abandonment. The Hobbs junction boxes were evaluated also according to the junction box plan. The Hobbs E-15 site initially was to be done under the generic redwood tank and pit closure plan. The impact suspected there and the landowner (OXY) desire to keep expense minimal, however, warrants usage of a RBCA plan, so ROC called in Arcadis to develop a plan. Leak sites are not worked according to the junction box plan, and are evaluated site by site. Some of the closure conditions, however, may resemble the junction box plan closure conditions (decline of chlorides, for example). The more ROC discovers about the historical

11/24/2004

salt behavior, the more we find we can apply it to sites.

As far as which sites are not the JB plan or RWTank plan, I'll have to get back to you. Generally, if a site has come into you for a workplan approval, the site is not on one of the two plans or is out of the scope of the plan.

>

> Also, the conference call on Dec 1 is a discussion on a path forward
> procedure for the sites in the Monument area. I wasn't planning on
> discussing each individual site with your contractors. The call will be
> about OCD's understanding and procedure for addressing the groundwater
> issue in that area. I think having contractors on the line will cloud the
> issue.

The only reason I wanted the consultants on the line is because they are truly handling their projects and ROC is just coordinating. It is not a problem to exclude them.

Please understand that ROC does not have staff that has the credentials or expertise of the consultants. I'm not an environmental professional and with my ROC management responsibilities, I can't keep my hand on everything. Kristin is a degreed geologist and has been with ROC 3 years, but that doesn't approach the experience and network of the consultants.

>

>

> Another issue is the Vacuum G-35 and F-35 projects. I sent an E-mail
> yesterday requiring action. I understand Randy Hicks sent E-mails
> concerning this project. We have a problem with his E-mails and we don't
> always get the attachments, and then usually we never receive the hard
> copy.
> However, It's not all his fault because we have had some E-mail problems
> ourselves and we have been inundated with paper work recently combined
> with
> the loss of Bill Olson. I am finding that some of the projects were in
> his
> name and may be the reason for some confusion. Please send anything
> associated with ROC to me and as I am making a concerted effort to process
> these as soon as possible.

ROC will send all project info to you. I'll talk with Randy about paperwork. The G-35 and F-35 sites will be addressed with you asap. I'll consult with Randy and get him on board with what OCD is going to require. I will want to discuss the conditions with you during the conference call.

>

> Hobbs SWD E-15. Please send photos and area map where it is located. Was
> there a closure plan issued for the tanks, jct box equipment etc. and is
> there photos for this work? Is this part of the Hobbs abandonment
> project?

The E-15 site is a redwood tank and pit site. It is part of the Hobbs abandonment. The tanks and pit were NORM cleared and removed under the generic plan. The site was partially delineated under the generic plan. All work was suspended due to the I-9 McNeill site pending the lawsuit, OCD's approval of the Stage II, and the new ownership of the land (OXY). We are now set to proceed and OXY wanted a RBCA to minimize expenses, so Arcadis was called in and Sharon Hall submitted a work plan to you.

I'm on vacation right now, but will be back in the office Monday. Kristin and I will discuss these issues and will look forward to our conference call for a path forward. I have long since believed the Monument area GW will have to become a cooperative effort of all the producers in the area. I believe the information we

are gathering now will map-out pockets of impact that can be addressed on a much larger scale - probably not approachable by ROC... We have a lot of work ahead, and it will take a long time to produce results. I've thought for some time now that the ROC work is just the top of the iceberg, but we're working as fast as we can. We have five consultants working on various projects and hope to secure the funding for work next year. ROC is in a precarious position these days, and I'm so glad oil is \$45+/bbl. Without that, AFEs would be very difficult to gain approval.

Have a great Thanksgiving. I am on my cell phone if you need to speak for any reason. 505-631-0680. Carolyn

>

>

> 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

>

>

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Price, Wayne

From: Price, Wayne
Sent: Wednesday, November 24, 2004 10:32 AM
To: Carolyn Doran Haynes (E-mail); Kristin Farris Pope (E-mail)
Subject: Rice Projects

Dear Carolyn:

The first thing I want to do is compliment Kristin on the good job she is doing on filing, processing and maintaining records on all of your projects. Excellent work!

The next item is a question. Which ROC projects are not under the generic Jct plan or Redwood Tank closure? Are you using the Jct Box plan for redwood tank and leak sites also? I understand that EME and DB projects are all under the generic Jct plan approved on July 22, 2003 by OCD. I also understand that disclosure reports from these projects are covered on a case-by-case basis. So how is the Hobbs SWD and other ROC systems being handled? Please clarify.

Also, the conference call on Dec 1 is a discussion on a path forward procedure for the sites in the Monument area. I wasn't planning on discussing each individual site with your contractors. The call will be about OCD's understanding and procedure for addressing the groundwater issue in that area. I think having contractors on the line will cloud the issue.

Another issue is the Vacuum G-35 and F-35 projects. I sent an E-mail yesterday requiring action. I understand Randy Hicks sent E-mails concerning this project. We have a problem with his E-mails and we don't always get the attachments, and then usually we never receive the hard copy. However, It's not all his fault because we have had some E-mail problems ourselves and we have been inundated with paper work recently combined with the loss of Bill Olson. I am finding that some of the projects were in his name and may be the reason for some confusion. Please send anything associated with ROC to me and as I am making a concerted effort to process these as soon as possible.

Hobbs SWD E-15. Please send photos and area map where it is located. Was there a closure plan issued for the tanks, jct box equipment etc. and is there photos for this work? Is this part of the Hobbs abandonment project?

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

IR 0414

Price, Wayne

From: Randall Hicks [R@rthicksconsult.com]
Sent: Wednesday, November 03, 2004 7:33 PM
To: 'Price, Wayne'
Cc: Kristin Farris Pope; 'Carolyn Doran Haynes'; david@rthicksconsult.com
Subject: Hobbs SWD System Abandonment Project - change in work plan
Importance: High

IR 0414
now

15 IR 0428

Wayne

As promised, we are drilling borings and wells in accordance with our work plan. In the field, however, we discovered that the Ogallala Aquifer is more than 100 feet thick (saturated thickness). Placing a well screen at the top and bottom of this very thick unit does not make sense with respect to gauging the effects (if any) of releases from these sites. Instead, we plan to place one well screen at the top of the aquifer (consistent with NMOCD Guidance) to test for any impact of hydrocarbons and chloride. In this same borehole, we will install a second 5-foot screen about 20 feet below the bottom of the upper screened zone. The purpose of this deeper screen is to determine if we have a chloride concentration gradient near these release sites that would suggest any density-driven impacts due to past brine releases.

If you have any concerns regarding this change to our work plan, please contact us immediately. We will be completing our first well tomorrow. We may complete the second well tomorrow also. If the data suggest that a third well is required, we probably will not complete that last well until Thursday morning. Then we move to the Lovington site.

Thanks.

Randy Hicks
505-266-5004 - office
505-238-9515 - cell

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11/5/2004

Price, Wayne

From: Randall Hicks [R@rthicksconsult.com]
Sent: Wednesday, October 20, 2004 3:34 PM
To: 'Price, Wayne'
Cc: 'Andrew Parker'; 'Carolyn Doran Haynes'; 'Kristin Farris'
Subject: Hobbs SWD System Abandonment

Wayne

This is our notification of field activities for this site.

Randy Hicks
505-266-5004 - office
505-238-9515 - cell

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10/22/2004

Price, Wayne

From: Randall Hicks [R@rthicksconsult.com]
Sent: Wednesday, October 20, 2004 6:04 AM
To: 'Price, Wayne'
Cc: 'Kristin Farris'; 'Andrew Parker'
Subject: Hobbs SWD Abandonment - Rice

Wayne

I will be at NMOCD offices Thursday, 9 am for an Empire Abo Gas Plant Meeting. At this time, I would like to collect any data NMOCD may have on the Windmill Oil Site that is up gradient from Hobbs SWD Abandonment site. I understand that your consultant completed some sampling work in this area some months ago.

I would appreciate any reference to files of other sites in the area as well. I attach Plate 2 of our workplan to refresh your memory regarding the location of the site.

We are preparing to conduct the investigation and we will submit a formal notification of the dates of our site work in a few days.

Randy Hicks
505-266-5004 - office
505-238-9515 - cell

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10/22/2004

R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266-0745

October 20, 2004

Mr. Wayne Price
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

RE: Hobbs SWD System Abandonment
Potential Groundwater-Impacted Junction Box Sites
Case 1R0414

Dear Mr. Price

This letter serves as our notification for conducting field work associated with the above-referenced project. We will commence field work on November 2.

As discussed in our approved workplan, we have identified five sites that are representative of the system and we plan to install one boring at each site. These five sites are:

- | | |
|--|-----------|
| 1. I-29 Vent Produced Water Pipeline Vent 18S.38E.29.I | 1R0428-41 |
| 2. I-29 EOL Boot End of Line Boot 18S.38E.29.I | 1R0428-42 |
| 3. O-29 Vent Produced Water Pipeline Vent 18S.38E.29.O | 1R0428-43 |
| 4. F-29-1A Junction Box 18S.38E.29.F | 1R0428-44 |
| 5. F-29-1B Produced Water Pipeline Boot 18S.38E.29.F | 1R0428-45 |

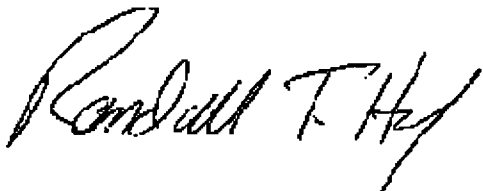
Below, we outline our approach as described in the workplan and in response to your August 6, 2004 conditional approval.

1. We will locate the vertical definition sampling borehole as close as practical to the suspected release source.
2. From each boring, we will obtain a split-spoon soil sample every five or ten feet throughout the entire vadose zone (ground surface to ground water).
3. We will evaluate these discrete samples, the borehole drilling characteristics, and drill cuttings to develop a lithologic profile of the vadose zone.
4. We will employ standard methods, as described in the Junction Box Replacement Program Plan, to evaluate all soil samples in the field for chloride content, TPH and volatile organic constituent content.
5. We will submit at least one soil sample from each boring to a qualified laboratory for evaluation of chloride and BTEXN (benzene, toluene, ethylbenzene, xylene, naphthalene). The field geologist will identify samples for laboratory analysis after review of the field analysis of chloride, TPH and VOCs. For all borings, we will submit the deepest sample for laboratory analysis of these constituents.

6. The geologist will select two samples from the first boring and two samples from the fourth boring for laboratory analysis of soil moisture content and bulk density.
7. We will obtain a background soil sample at a depth of about 5 feet at a location 300 feet from any visible or suspected surface releases.
8. If field analyses of a borehole show chloride concentrations are consistently greater than 3 times background from ground surface to ground water, we will conclude that periodic discharges from the source created saturated conditions in the past. For any borehole that encounters these potential saturated conditions, we will continue drilling through the saturated zone to the top of the Dockum Group red beds, which form the base of the aquifer in this area. If the saturated thickness of the aquifer in this boring is less than 25 feet, we will install a 2-inch monitoring well with five feet of screen above the water table and 15 feet below the water table, in a manner consistent with industry standards (see NMOCD, ASTM or EPA publications).
9. If the saturated thickness of the aquifer is greater than 25 feet we will install one well screen as described above and a second 5-foot screen above the top of the Dockum Group red beds.
10. We will sample any ground water monitoring wells using micro-purge and "no-purge" techniques to collect two separate samples from this "flow through" monitoring well. We will collect a water sample just below the air water interface, which will be employed for evaluation of any impact from a release of hydrocarbons as well as chloride and TDS. At the bottom of the aquifer we will obtain a second sample, which we will test for chloride TDS.
11. We expect no material horizontal migration from these potential release sites. If previous excavation work did not provide adequate horizontal characterization, we will provide a protocol for such characterization after our evaluation of these vertical delineation borings.

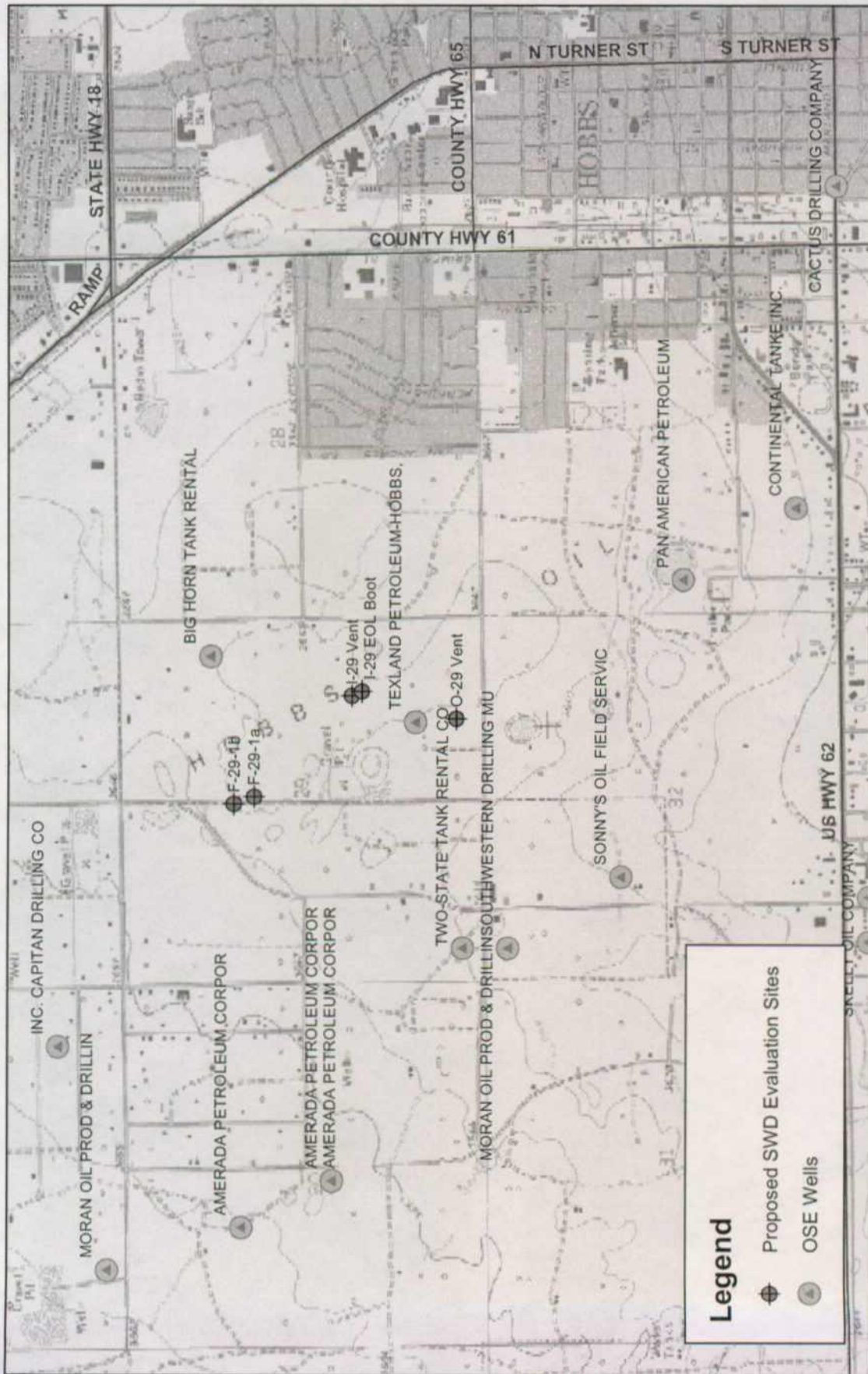
If you have any questions concerning this field program, please contact Andrew Parker of my staff or me.

Sincerely,
R.T. Hicks Consultants, Ltd.



Randall Hicks
Principal

Copy: Rice Operating Company



Source Map: USGS 7.5' Quad; Hobbs West

R.T. Hicks Consultants, LLC
 901 Rio Grande Blvd NW Suite F-142
 Albuquerque, NM 87104
 Ph: 505.266.5004

Location of wells on the Office of the State Engineer (OSE) database

Plate 2

Rice Operating Company

March
2004

Price, Wayne

From: Price, Wayne
Sent: Friday, August 06, 2004 1:59 PM
To: Carolyn Doran Haynes (E-mail)
Cc: Randall Hicks (E-mail); Sheeley, Paul; Johnson, Larry
Subject: Rice operating Hobbs SWD System Abandonment

Letter went out today.



approval of March
11, 2004 req...

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

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

August 06, 2004

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

RE: Hobbs Salt Water Disposal System Abandonment Project
OCD Case # 1R0414
Lea County, New Mexico

Dear Ms. Haynes:

The New Mexico Oil Conservation Division (OCD) is in receipt of the March 11, 2004 Work Plan to investigate five sites located on the west side of Hobbs, New Mexico. OCD hereby approves of the plan with the following conditions:

1. Each site shall be delineated both vertically and horizontally, unless previously completed.
2. All trend line analysis for chlorides shall be developed using a minimum of five data points. If the last data point is greater than 250 ppm, then OCD will require additional data points for confirmation.
3. Each investigation borehole shall not terminate until item 2. above is satisfied and the last soil sample collected (i.e. bottom hole sample) is below 100 ppm of TPH. Each bottom hole sample shall be analyzed for BTEX, TPH and General Chemistry by EPA approved laboratory analysis.
4. All background samples shall be collected at a minimum of 300 feet from any known or visual contamination. Each background sample shall be analyzed for TPH, BTEX and General Chemistry by EPA approved laboratory analysis.
5. Each investigation report shall contain the information ROC proposed including dated photos taken before investigation. Each report shall have the OCD Case # 1R0414 for record keeping purposes. Each site that is modeled shall use also a ten feet aquifer thickness in the model. Each investigation report shall include the distance to nearest fresh water well, surface water, watercourse including playas

(dry or wet), depth to groundwater, distance to nearest residence, business or school etc. if less than one mile.

6. Records shall be maintained for the disposal of all waste.
7. OCD Santa Fe office and the OCD District office shall be notified 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.

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 OCD, 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.

Sincerely,



Wayne Price- Engineer

cc: Roger Anderson-Environmental Bureau Chief
OCD Hobbs Office,

R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266-0745

March 11, 2004

Mr. Wayne Price
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

RE: Hobbs SWD System Abandonment
Potential Groundwater-Impacted Junction Box Sites

Dear Mr. Price

Rice Operating Company (ROC) retained Hicks Consultants to address potential environmental concerns at the above referenced sites. This submission proposes a scope of work that we believe will best mitigate any threat to human health and the environment and lead to closure of the regulatory file for this site.

Background

Plate 1 shows the location of the area of the Hobbs SWD System that is the subject of this work plan. During the abandonment process, ROC found evidence of produced water leakage at 36 sites (see Table 1 and Plate 1). Our initial field inspection suggests that past releases at some of these sites are very minor and will pose no threat to human health or the environment, including surface soil. Nevertheless, we propose a more thorough examination of these sites and submission of our findings.

The Hobbs SWD System operated at a capacity of about 40,000 barrels/day from the late 1950s to the late 1980s. During the past decade, about 1000 barrels/day flowed through the system. We believe that the soil staining and other evidence of produced water leakage at these 36 sites dates to the time when the system was operating at capacity. We hypothesize that accidental releases to the environment at many of these sites ceased in the 1990s and natural restoration has mitigated the effects of any past releases. At most release sites, we witnessed no vegetation stress that we could attribute to any past releases. Our proposed scope of work is outlined below.

Task 1 Collect Regional Hydrogeologic Data

Within the area shown on Plate 1, we found over 2000 wells in the database of the Office of the State Engineer (OSE). Plate 2 shows the location of selected water wells on the OSE and USGS database. Table 2 identifies the well owners and certain other specifics regarding these selected wells. We understand that the NMOCD is currently obtaining water levels and water quality samples in support of an investigation of the nearby Windmill Oil Company site (Section 30). We understand that the results of the NMOCD study are not presently available. We do not plan to duplicate NMOCD efforts and Table 2 excludes all wells found in Section 30.

Nevertheless, we require some regional data in order to proceed in a timely fashion. We will attempt to sample at least 10 wells identified in Table 2 to provide an understanding of the regional water quality. Where possible, we will obtain static water levels from these wells. For each of these wells, we will obtain available driller's logs to help us define the regional geology.

We will evaluate these data, data available from the NMOC investigation of the Windmill Oil Company, published data, and available historical data from the USGS database. The purpose of this research is to assist us with the planning of the proposed drilling program (Task 2).

Task 2 Evaluate Chloride and BTEXN Concentrations in Soil at Five Sites, Evaluate Ground Water Quality if Necessary

We have identified five sites that are representative of the system and we plan to install one boring at each site. These five sites (see Plate 1 and Table 1) are:

- | | | |
|------------------|------------------------------|--------------|
| 1. I-29 Vent | Produced Water Pipeline Vent | 18S.38E.29.I |
| 2. I-29 EOL Boot | End of Line Boot | 18S.38E.29.I |
| 3. O-29 Vent | Produced Water Pipeline Vent | 18S.38E.29.O |
| 4. F-29-1A | Junction Box | 18S.38E.29.F |
| 5. F-29-1B | Produced Water Pipeline Boot | 18S.38E.29.F |

We will locate the sampling borehole as close as practical to the suspected release source. Due to the presence of caliche in the subsurface, we plan to employ air-rotary drilling techniques. From each boring, we will obtain split-spoon soil samples every five or ten feet of the vadose zone.

We will evaluate these discrete samples, the borehole drilling characteristics, and drill cuttings to develop a lithologic profile of the vadose zone. We will employ standard methods, as described in the Junction Box Replacement Program Plan, to evaluate all soil samples in the field for chloride content, TPH and volatile organic constituent content. We will submit at least one soil sample from each boring to a qualified laboratory for evaluation of chloride and BTEXN (benzene, toluene, ethylbenzene, xylene, naphthalene). The field geologist will identify samples for laboratory analysis after review of the field analysis of chloride, TPH and VOCs. The geologist will select two samples from the first boring and two samples from the fourth boring for laboratory analysis of soil moisture content and bulk density. We will also obtain a background soil sample at a depth of about 5 feet.

If field analyses of a borehole show chloride concentrations are consistently greater than 3 times background from ground surface to ground water, we will conclude that periodic discharges from the source created saturated conditions in the past. For any borehole that encounters potential saturated conditions, we will continue drilling through the saturated zone to the top of the Dockum Group red beds, which form the base of the aquifer in this area. If the saturated thickness of the aquifer in this boring is less than 25 feet, we will install a 2-inch monitoring well with five feet of screen above the water table and 15 feet below the water

table, in a manner consistent with industry standards (see NMOCD, ASTM or EPA publications). If the saturated thickness of the aquifer is greater than 25 feet we will install one well screen as described above and a second 5-foot screen above the top of the Dockum Group red beds. We will use micro-purge and "no-purge" techniques to collect two separate samples from this "flow-through" monitoring well. We will collect a sample the air water interface, which will be employed for evaluation of any impact from a release of hydrocarbons as well as chloride and TDS. At the bottom of the aquifer we will obtain a second sample, which we will test for chloride TDS. Appendix A describes the "no-purge" sampling technique we plan to employ at this site after initial sampling using micro-purge techniques.

Task 3 Evaluate Chloride, Benzene and Naphthalene Flux from the Vadose Zone to Ground Water

We anticipate that one or all of the five sites selected for borehole investigation will show evidence of seepage from the source to a depth of more than 10-feet. For these sites, excavation and disposal of released material can cause more environmental damage than it cures. For such sites, we propose to employ HYDRUS-1D and a simple ground water mixing model to evaluate the potential of any residual chloride and hydrocarbon mass in the vadose zone to materially impair ground water quality at the site. We will employ predictions of the migration of chloride ion, benzene and naphthalene from the vadose zone to ground water in our selection of an appropriate remedy for the land surface and underlying vadose zone. This simulation is the "no action" alternative, which predicts chloride flux to ground water in the absence of any action by ROC. We have selected these three constituents for simulation modeling because each of these constituents exists in the fluids stored in the tanks and each is specifically regulated by New Mexico ground water regulations (WQCC).

We will employ the input parameters to HYDRUS and the mixing model outlined in Table 3. In

Table 3: Input Parameters for HYDRUS-1D

Input Parameter	Source
Vadose Zone Thickness	Proposed borings and/or well logs on file with the OSE
Vadose Zone Texture	Proposed borings and well logs on file with the OSE
Dispersion Length	Professional judgment, typically 10% of the model length
Soil Moisture	Field Measurements from borings and/or HYDRUS-1D simulations
Vadose Zone Chloride Load	Sampling data from proposed borings
Length of release perpendicular to ground	Field Measurements, these sites are generally less than 30 feet in diameter
Climate	Pearl, NM station (Hobbs)
Background Chloride in Ground Water	Samples from water supply wells
Ground Water Flux	Calculated from regional hydraulic data, data from nearby wells, and published data
Aquifer Thickness	Nicholson and Clebsch (1960), and well logs on file with the OSE

the no action simulation, we will assume that vegetation is present over the release site. This assumption is consistent with our site observations. We anticipate that any release of chloride to ground water will disperse throughout the entire thickness of the aquifer after a short travel distance. Unless the hydrogeology of the site suggests differently (see Task 1), we plan to use the entire aquifer thickness as the input to the mixing model equation. For hydrocarbons, such as benzene and naphthalene, assuming a chemical stratification within the aquifer is appropriate. For these constituents, we plan to use only the uppermost 10 feet of the aquifer in the mixing model equation

Task 4 Design Corrective Action Plan

After ROC completes the abandonment of the Hobbs SWD System, there can be no additional releases of produced water. Our modeling of the "no action alternative" at these five sites may show that the residual chloride and hydrocarbon mass in the vadose zone poses a threat to ground water quality. If such a threat does exist, we will expand upon the HYDRUS-1D model predictions described above to develop a remedy for the vadose zone. If necessary, we will simulate:

1. excavation, disposal and replacement of clean soil to remove the chloride and hydrocarbon mass,
2. installation of a low permeability barrier to minimize natural infiltration,
3. surface grading and seeding to eliminate any ponding of precipitation and promote evapotranspiration, thereby minimizing natural infiltration, and
4. a combination of the above potential remedies.

We will select the vadose zone remedy that offers the greatest environmental benefit while causing the least environmental damage. We will provide a Net Environmental Benefit Analysis to support our selection of the remedy.

We will use the ground water mixing model or a suitable alternative to assist in the design of any required ground water remedy. It is possible, however, that the background chloride and /or hydrocarbon concentrations in ground water measured in the nearby wells are equal to or higher than the concentration in any monitoring well installed under this work plan. Such data would strongly suggest that the site in question has not caused any material impairment of ground water quality. If we find no evidence of impairment of water quality due to past activities, we will not prepare a ground water remedy. If data suggest that the site has contributed chloride or hydrocarbons to ground water and caused ground water impairment, we will examine the following alternatives:

1. Natural restoration due to dilution and dispersion,
2. Pump and dispose to remove the chloride and hydrocarbon mass in the saturated zone,

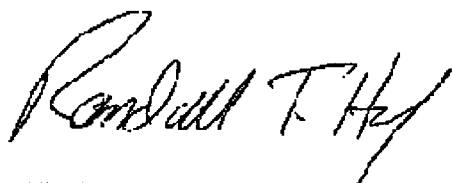
3. Pump and treat to remove the chloride and hydrocarbon mass in the saturated zone,
4. Because of the location of the site, institutional controls negotiated with the landowner may provide an effective remedy. Such controls may be restriction of water use to livestock until natural restoration returns the water quality to state standards, a provision for alternative supply well design, or a provision for well head treatment to mitigate any damage to the water resource.

We will select the ground water remedy that offers the greatest environmental benefit while causing the least environmental damage. We will provide a Net Environmental Benefit Analysis to support our selection of the remedy. We may propose additional ground water monitoring wells to support the evaluation and selection of a remedy.

We plan to deliver a Corrective Action Plan that is similar to the Junction Box Replacement Program Plan. This type of submittal will allow ROC to evaluate each site, prioritize the restoration of each site based upon a risk profile, and then begin restoration of those sites that pose the highest risks. Depending upon the results of the work described herein, ROC may elect to move forward with an area-wide plan rather than proposing 36 individual remedies. We propose to complete the work of described in Tasks 1-3, begin the work outlined in Task 4 and then meet with NMOCD to discuss the scope of the final submittal.

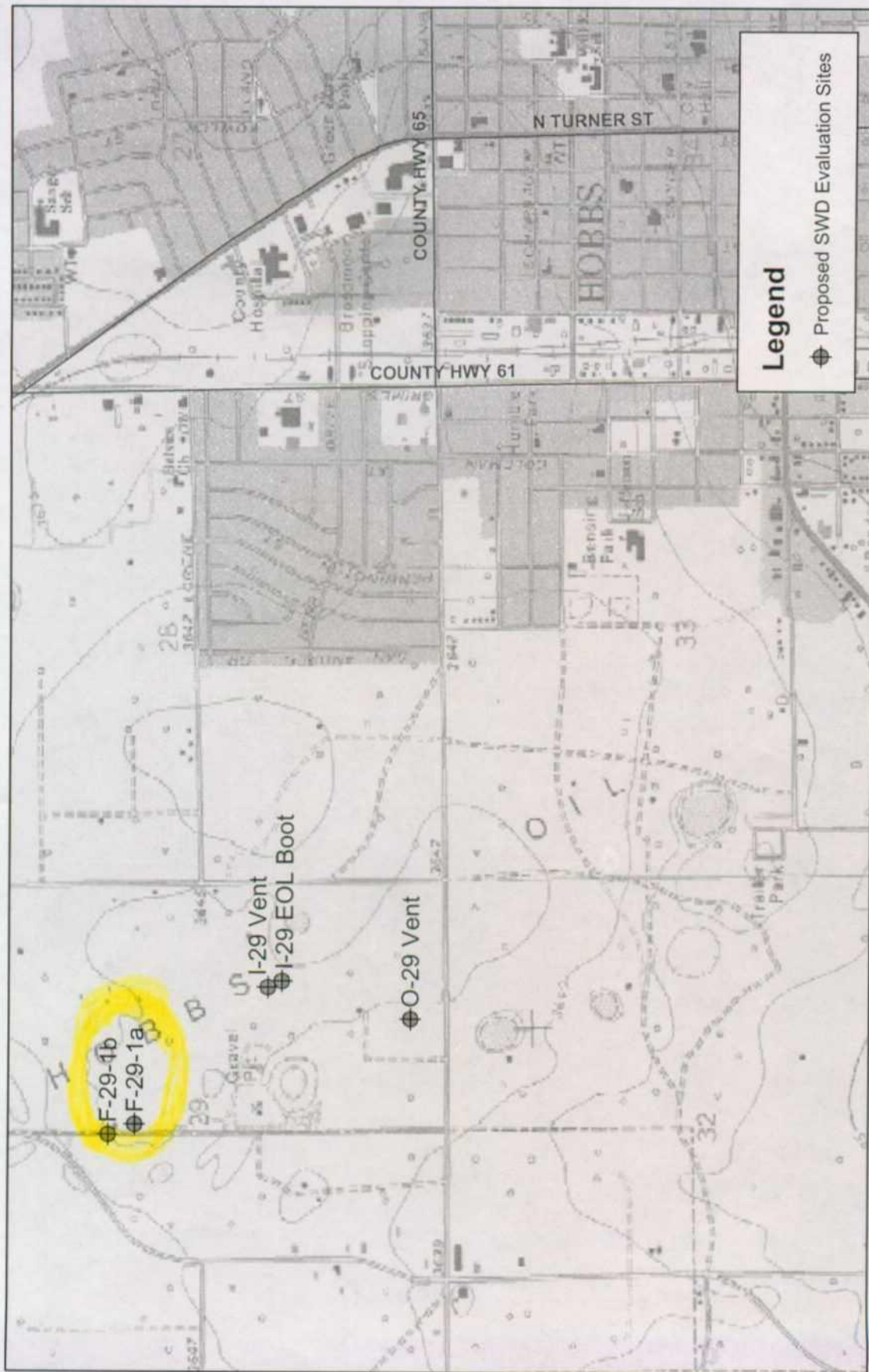
We plan to commence data collection for the HYDRUS-1D simulations described above in late March or early April. Your approval to move forward with this work plan will facilitate our access to nearby wells and approval of expenditures by the System Partners.

Sincerely,
R.T. Hicks Consultants, Ltd.



Randall T. Hicks
Principal

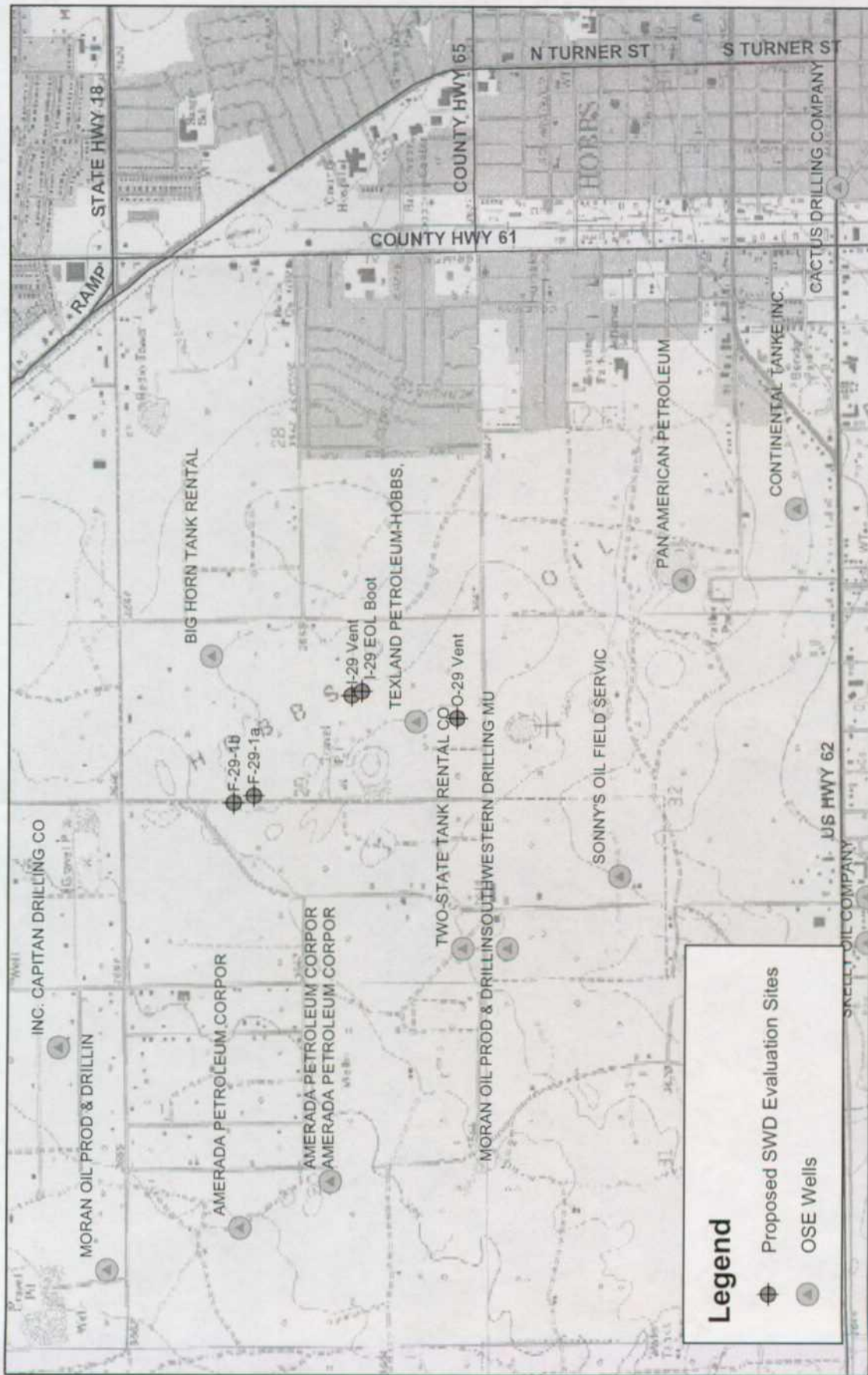
Copy:
Rice Operating Company



Source Map: USGS 7.5' Quad; Hobbs West



R.T. Hicks Consultants, LLC 901 Rio Grande Blvd NW Suite F-142 Albuquerque, NM 87104 Ph: 505.266.5004	<table border="1"> <tr> <td data-bbox="1339 566 1422 1583">Location of Salt Water Disposal System</td><td data-bbox="1339 338 1422 566">Plate 1</td></tr> <tr> <td data-bbox="1422 566 1495 1583">Rice Operating Company</td><td data-bbox="1422 338 1495 566">March 2004</td></tr> </table>	Location of Salt Water Disposal System	Plate 1	Rice Operating Company	March 2004
Location of Salt Water Disposal System	Plate 1				
Rice Operating Company	March 2004				



Source Map: USGS 7.5' Quad; Hobbs West

R.T. Hicks Consultants, LLC
 901 Rio Grande Blvd NW Suite F-142
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Location of wells on the Office of the State Engineer (OSE) database

Plate 2

Rice Operating Company

March
2004

Table 1

HOBBS Junction Box Disclosures: Potential Groundwater Impact

These junction box sites have become "disclosure" rather than "closure" sites because significant TPH or salt impact has deemed the site remediation to be outside the scope of the Rice Operating Company Generic Junction Box Plan. Each of these sites has the potential for groundwater impact, based on delineation results. As noted, some of the sites are confirmed to have groundwater impact and have been officially reported to the NMOCD and are being monitored for groundwater quality. These sites are being evaluated for risk-based corrective action and plans will be submitted to the NMOCD.

F-24-3 Vent	Hobbs	F	Sec 24, T18S, R37E	<50	NM	Initial evaluation only	1/31/2003
F-25 EOL	Hobbs	F	Sec 25, T18S, R37E	<50	NM	Initial evaluation only	1/31/2003
M-20 Vent	Hobbs	M	Sec 20, T18S, R38E	<50	Samuel Bruton	Initial evaluation only	1/31/2003
E-29 Vent	Hobbs	E	Sec 29, T18S, R38E	<50	Oxy Permian	Initial evaluation only	1/31/2003
I-29 EOL	Hobbs	I	Sec 29, T18S, R38E	<50	Oxy Permian	Initial evaluation only	1/31/2003
K-29 EOL Boot	Hobbs	K	Sec 29, T18S, R38E	<50	Oxy Permian	Initial evaluation only	1/31/2003
O-29 EOL	Hobbs	O	Sec 29, T18S, R38E	<50	Oxy Permian	Initial evaluation only	1/31/2003
O-29 Vent	Hobbs	O	Sec 29, T18S, R38E	<50	Oxy Permian	Initial evaluation only	1/31/2003
O-29-1 Vent	Hobbs	O	Sec 29, T18S, R38E	<50	Oxy Permian	Initial evaluation only	1/31/2003
P-29 Vent	Hobbs	P	Sec 29, T18S, R38E	<50	Oxy Permian	Initial evaluation only	1/31/2003
C-30 Vent	Hobbs	C	Sec 30, T18S, R38E	<50	James Hanson	Initial evaluation only	1/31/2003
Jct. F-31-1	Hobbs	F	Sec 31, T18S, R38E	<50	V. R. Jones	Initial evaluation only	1/31/2003
Jct. F-31-2	Hobbs	F	Sec 31, T18S, R38E	<50	V. R. Jones	Initial evaluation only	1/31/2003
B-32 Boot	Hobbs	B	Sec 32, T18S, R38E	<50	Oxy Permian	Initial evaluation only	1/31/2003
F-33 Vent	Hobbs	F	Sec 33, T18S, R38E	<50	NM	Initial evaluation only	1/31/2003
A-6 Vent	Hobbs	A	Sec 6, T19S, R38E	<50	NM	Initial evaluation only	1/31/2003
Jct. A-25	Hobbs	A	Sec 25, T18S, R37E	<50	NM	Initial evaluation only	1/31/2003
Jct. P-31	Hobbs	P	Sec 31, T18S, R38E	<50	Kress Jones	Initial evaluation only	1/31/2003
Jct. F-24-1	Hobbs	F	Sec 24, T18S, R37E	<50	NM	Primary Delineation only	1/31/2003
Jct. F-29-1A	Hobbs	F	Sec 29, T18S, R38E	<50	Oxy Permian	Primary Delineation only	1/31/2003
Jct. F-29-1B (G-29)	Hobbs	F	Sec 29, T18S, R38E	<50	Oxy Permian	Primary Delineation only	2/4/2004
I-29 Vent	Hobbs	I	Sec 29, T18S, R38E	<50	Oxy Permian	Primary Delineation only	1/31/2003
F-30 Vent	Hobbs	F	Sec 30, T18S, R38E	<50	James Hanson et ux	Primary Delineation only	1/31/2003
Jct. L-30	Hobbs	L	Sec 30, T18S, R38E	<50	NM	Primary Delineation only	1/31/2003
Jct. E-32-1	Hobbs	E	Sec 32, T18S, R38E	<50	Oxy Permian	Primary Delineation only	1/31/2003
Jct. E-32-2	Hobbs	E	Sec 32, T18S, R38E	<50	Oxy Permian	Primary Delineation only	1/31/2003

Jct. E-33-1	Hobbs	E	Sec 33, T18S, R38E	<50		NM	Primary Delineation only	1/31/2003
Jct. N-4	Hobbs	N	Sec 4, T19S, R38E	<50		NM	Primary Delineation only	1/31/2003
O-5 Vent	Hobbs	O	Sec 5, T19S, R38E	<50		Dee Cochran	Primary Delineation only	1/31/2003
Jct. H-29	Hobbs	H	Sec 29, T18S, R38E	<50		Sage & Cottrell	Primary Delineation only	1/31/2003
Jct. E-4	Hobbs	E	Sec 4, T19S, R38E	<50		NM	Primary Delineation only	1/31/2003
Jct. O-13 (N)	Hobbs	O	Sec 13, T18S, R37E	<50		Charles Seed Trst	Primary Delineation only	1/31/2003
G-9 Vent	Hobbs	G	Sec 9, T19S, R38E	<50		NM	Primary Delineation only	1/31/2003
Jct. A-6	Hobbs	A	Sec 6, T19S, R38E	<50		NM	Primary Delineation only	1/31/2003
Jct. E-33-2	Hobbs	E	Sec 33, T18S, R38E	<50		NM	Primary Delineation only	1/31/2003
vent M-4	Hobbs	M	Sec. 4, T19S, R38E	<50		J. A. Desoto	Initial evaluation only	9/11/2003

These Hobbs SWD System junction boxes, which have potential for groundwater impact, are not yet at a work-status to report as a disclosure. The Hobbs SWD System Environmental Committee has directed Rice Operating Company to prioritize the sites according to vadose zone and groundwater receptors, NMOCD score, landowner, surface use, etc. in order to coordinate the most effective and timely use of resources. The Hobbs SWD System Environmental Committee is committed to completing the abandonment of the Hobbs SWD Gathering System, and projects the remediation of these junction box sites to be a long-term endeavor, possibly 7-10 years. Each of these sites have significant TPH and salt impact and are deemed to be outside the scope of the Rice Operating Company Generic Junction Box Plan. As sites are prioritized, work plans will be developed and submitted to the NMOCD for review, feedback and approval.

Table 2: Selected Water Well Records from the OSE Database

DB File Nbr	Use	Div	Owner	Well Depth	Water Depth	Well Number	Source	Tws	Rng	Sec	q	q	Date	Date
L 06660 (E)	PRO		MORAN OIL PROD & DRILLIN	120	48	G CORP L 06660 (E)	Shallow	18S	38E	19	3	3	3/23/1970	3/23/1970
L 06337	PRO		INC. CAPITAN DRILLING CO	110	40	MPANY L 06337	Shallow	18S	38E	19	4	2	6/10/1968	6/10/1968
L 08716	SAN		OIL FIELD RENTAL SERVICE	130	49	CO. L 08716	Shallow	18S	38E	20	2	1	3/23/1982	3/24/1982
L 07810	SAN		MACK TRUCK DEALERSHIP	120	60	L 07810	Shallow	18S	38E	20	2	2	11/25/1977	11/27/1977
L 09475	SAN		STOEHR WIRE ROPE OF TEXA	120	60	S INC. L 09475	Shallow	18S	38E	20	2	2	5/7/1984	5/7/1984
L 08851	SAN		A.A. OILFIELD	120	54	L 08851	Shallow	18S	38E	20	2	3	7/1/1982	7/2/1982
L 08009	SAN		INC. HOBBS DIESEL	167	60	L 08009	Shallow	18S	38E	28	1	1	1/16/1979	1/20/1979
L 08867	SAN		BIG HORN TANK RENTAL	120	52	L 08867	Shallow	18S	38E	29	2	2	7/9/1982	7/10/1982
L 07754	OBS		CROWN CHEMICAL COMPANY	207	50	L 07754	Shallow	18S	38E	29	2	4	9/8/1977	9/14/1977
L 06570 (E)	PRO		MORAN OIL PROD & DRILLIN	110	54	G CORP L 06570 (E)	Shallow	18S	38E	29	3	3	8/5/1969	8/5/1969
L 07570	DOM		SOUTHWESTERN DRILLING MU	122	48	D L 07570	Shallow	18S	38E	29	3	3	6/21/1976	6/22/1976
L 07005	SAN		TWO-STATE TANK RENTAL CO	150	50	L 07005	Shallow	18S	38E	29	3	3	10/14/1972	10/18/1972
L 11176			TEXLAND PETROLEUM-HOBBS,	220	65	LLC L 11176	Shallow	18S	38E	29	4	1	7/31/2001	8/3/2001
L 02395	PRO		AMERADA PETROLEUM CORPOR	87	30	ATION L 02395	Shallow	18S	38E	30	1	2	8/31/1953	8/31/1953
L 05849	PRO		AMERADA PETROLEUM CORPOR	38	34	ATION L 05849	Shallow	18S	38E	30	1	4	2/10/1966	2/12/1966
L 05818	PRO		AMERADA PETROLEUM CORPOR	32	32	ATION L 05818	Shallow	18S	38E	30	1	4	12/15/1965	12/17/1965
L 10093	PRO		WINDMILL OIL COMPANY	52	42	L 10093	Shallow	18S	38E	30	4	1	10/2/1989	10/2/1989
L 10094	PRO		WINDMILL OIL COMPANY	52	42	L 10094	Shallow	18S	38E	30	4	1	10/3/1989	10/3/1989
L 10095	PRO		WINDMILL OIL COMPANY	52	42	L 10095	Shallow	18S	38E	30	4	1	10/4/1989	10/4/1989
L 10096	PRO		WINDMILL OIL COMPANY	52	42	L 10096	Shallow	18S	38E	30	4	1	10/6/1989	10/6/1989
L 09936	PRO		WINDMILL OIL COMPANY	50	41	L 09936	Shallow	18S	38E	30	4	1	7/28/1987	8/1/1987
L 10097	PRO		WINDMILL OIL COMPANY	52	41	L 10097	Shallow	18S	38E	30	4	1	10/3/1989	10/4/1989
L 05874	SAN		STAR TOOL COMPANY	125	45	L 05874	Shallow	18S	38E	32	1	1	3/2/1966	3/3/1966
L 10620	SAN		BULL DOG TOOL	158	43	L 10620	Shallow	18S	38E	32	1	3	12/17/1996	12/17/1996
L 10558	SAN		BULL DOG TOOL INC	120	80	L 10558	Shallow	18S	38E	32	1	3	5/5/1996	5/5/1996
L 10035	SAN		BALER SERVICE TOOLS	150	65	L 10035	Shallow	18S	38E	32	1	1	10/20/1988	10/20/1988
L 02964	DOM		SONNY'S OIL FIELD SERVIC	150	34	E INC. L 06245	Shallow	18S	38E	32	1	1	12/29/1967	12/30/1967
L 02555	DOM		INC. BAKER OIL TOOLS	100	30	L 02964	Shallow	18S	38E	32	3	3	9/10/1955	9/11/1955
L 02555	PRO		SKELLY OIL COMPANY	116	34	L 02555	Shallow	18S	38E	32	3	3	6/25/1954	6/25/1954
L 02232	DOM		PAN AMERICAN PETROLEUM	120	52	L 06574 (E)	Shallow	18S	38E	33	1	3	8/18/1969	8/19/1969
L 03516	PRO		CONTINENTAL TANKE INC.	112	56	L 02232	Shallow	18S	38E	33	3	3	6/23/1953	6/23/1953
			CACTUS DRILLING COMPANY	106	45	L 03516 APPR	Shallow	18S	38E	34	3	3	8/21/1956	8/22/1956

RICE Operating Company

122 West Taylor • Hobbs, New Mexico 88240
Phone: (505)393-9174 • Fax: (505) 397-1471

Transmitted via E-Mail
on January 16, 2004

January 16, 2004

Certified Mail Return Receipt No.
7002 2410 0000 4940 1107

Mr. Wayne Price
NM Energy, Minerals and Natural Resources Department
Oil Conservation Division, Environmental Bureau
1220 S. St. Francis Drive
Santa Fe, NM 87504

RECEIVED

JAN 22 2004

OIL CONSERVATION
DIVISION

Re: Hobbs SWD System Abandonment
Potential Groundwater-Impacted Junction Box Sites

Dear Mr. Price:

Rice Operating Company (ROC) is in the process of abandoning the Hobbs Salt Water Disposal System, which had been operated by ROC since 1958. The Hobbs SWD System is owned by a consortium of oil producers, System Partners, who provided operating capital and now abandonment capital based on percent ownership. (ROC has no ownership of pipelines, wells, or facilities of the Hobbs SWD System.) This abandonment project requires System Partner AFE approval and pre-work funding.

Through the course of the pipeline and junction box abandonment activities, ROC submitted to the NMOCD a list of 36 junction box sites that exhibited some evidence of potential groundwater impact. These sites could not be closed within the scope of the ROC "Revised Junction Box Upgrade Plan" because of the potential extent of the impact and economics of remediating to a closure status. The ROC "Revised Junction Box Upgrade Plan" recognizes sites that are: "outside the scope of this work plan and will become a risk-based corrective action (RBCA) project-site."

ROC has secured these sites by backfilling the delineation excavation, recording Global Positioning System-defined coordinates (GPS), and implanting a steel identification plate in the center of the site (insures exact re-location of the impact area). In accordance with the "Revised Junction Box Upgrade Plan" each of these 36 sites have been evaluated and prioritized by the Hobbs SWD System Environmental Committee with the intention that individual work plans will be submitted in due course to the NMOCD.

The Hobbs SWD System Partners have directed ROC to propose to the NMOCD that these 36 sites undergo further characterization and if warranted, remediation under an abandonment work plan that encompasses four (4) years. The four-year work plan proposal is supported by several points: the impact will not be compounded because the Hobbs SWD System is completely inactive; each site has been secured for safety and re-location of impact; and logistically, remediation of 9 sites per year is optimistic but possible considering both manpower and economics. A Risk-Based Corrective Action (RBCA) Plan will be developed and submitted for

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NMOCD approval for each individual site based on site-specific assessment and impact parameters.

ROC and the Hobbs SWD System Partners have retained RT Hicks Consultants of Albuquerque, NM to initiate the development of RBCA Plans for four (4) of these sites. It is expected that the RBCA plans for these four sites will be submitted to the NMOCD by March 1, 2004. The remaining plans for five more sites for 2004 will be developed later in the year and will undoubtedly reflect the conditions/approval reached for these first four site plans.

As always, NMOCD will be notified in advance by email of work schedule and timing of significant events and will be consulted throughout the work plan process for concurrence of any significant plan alterations, analytical interpretations, etc. NMOCD will be given specific advance notice of sites located within a city limits or ¼ mile from a residence, business, school, public water source, etc. Work plan activities and results at any of these sites will be immediately communicated to the Santa Fe NMOCD office for concurrence or conditions of strategy.

Thank you for your consideration of this proposal for a 4-year plan to remediate the remaining 36 impacted sites of the Hobbs SWD System pipeline and junction box abandonment. ROC also thanks NMOCD for acknowledging issues ROC faces with landowners, System Partners and operations of an aging infrastructure. We look forward to hearing from you soon. If there are any additional questions, please contact me at the above phone number.

Sincerely,

RICE OPERATING COMPANY



Carolyn Doran Haynes
Engineering Manager

Attachments

cc: LBG, SC, file
RT Hicks
NMOCD: Roger Anderson

RICE Operating Company

122 West Taylor • Hobbs, New Mexico 88240
Phone: (505)393-9174 • Fax: (505) 397-1471

CERTIFIED MAIL

RETURN RECEIPT NO. 7000 1530 0005 9895 4787

March 27, 2003

Mr. Wayne Price
New Mexico Energy, Minerals, & Natural Resources
Oil Conservation Division, Environmental Bureau
1220 S. St. Francis Drive
Santa Fe, New Mexico 87504

RE: JUNCTION BOX UPGRADE REPORT for 2002
Hobbs SWD SYSTEM
Lea County, New Mexico

Mr. Price:

Rice Operating Company (ROC) takes this opportunity to submit the Junction Box Upgrade results for the year 2002. Enclosed is a list of the completed junction boxes and their respective closure dates. These boxes are located in the Hobbs Salt Water Disposal System and are part of the System abandonment.

ROC is the service provider (operator) for the Hobbs SWD System and has no ownership of any portion of the pipeline, well, or facility. The System is owned by a consortium of oil producers, System Partners, who provide all operating capital on a percentage ownership/usage basis. Replacement/closure projects of this magnitude require System Partner AFE approval and work begins as funds are received.

ROC completed 57 junction box sites in 2002. The remaining junction boxes in the system have suspected or confirmed severe environmental impact. A steering committee of System Partners has been formed to investigate and recommend remedial actions for the remaining sites. Enclosed is an analysis of ROC's chloride field tests compared with the laboratory's results.

Thank you for your consideration of this Junction Box Upgrade Report for 2002.

RICE OPERATING COMPANY

Kristin Farris

Kristin Farris
Project Scientist

Enclosures
Cc: LBG, CDH, file,

Mr. Chris Williams
NMOCD, District I Office
1625 N. French Drive
Hobbs, NM 88240

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HOBBS SWD
RICE JCT BOX UPGRADE
PROJECT



RICE Operating Company

HOBBS SWD SYSTEM Junction Box Upgrade Project

Completed Boxes 2002 Final Report and Disclosure Report

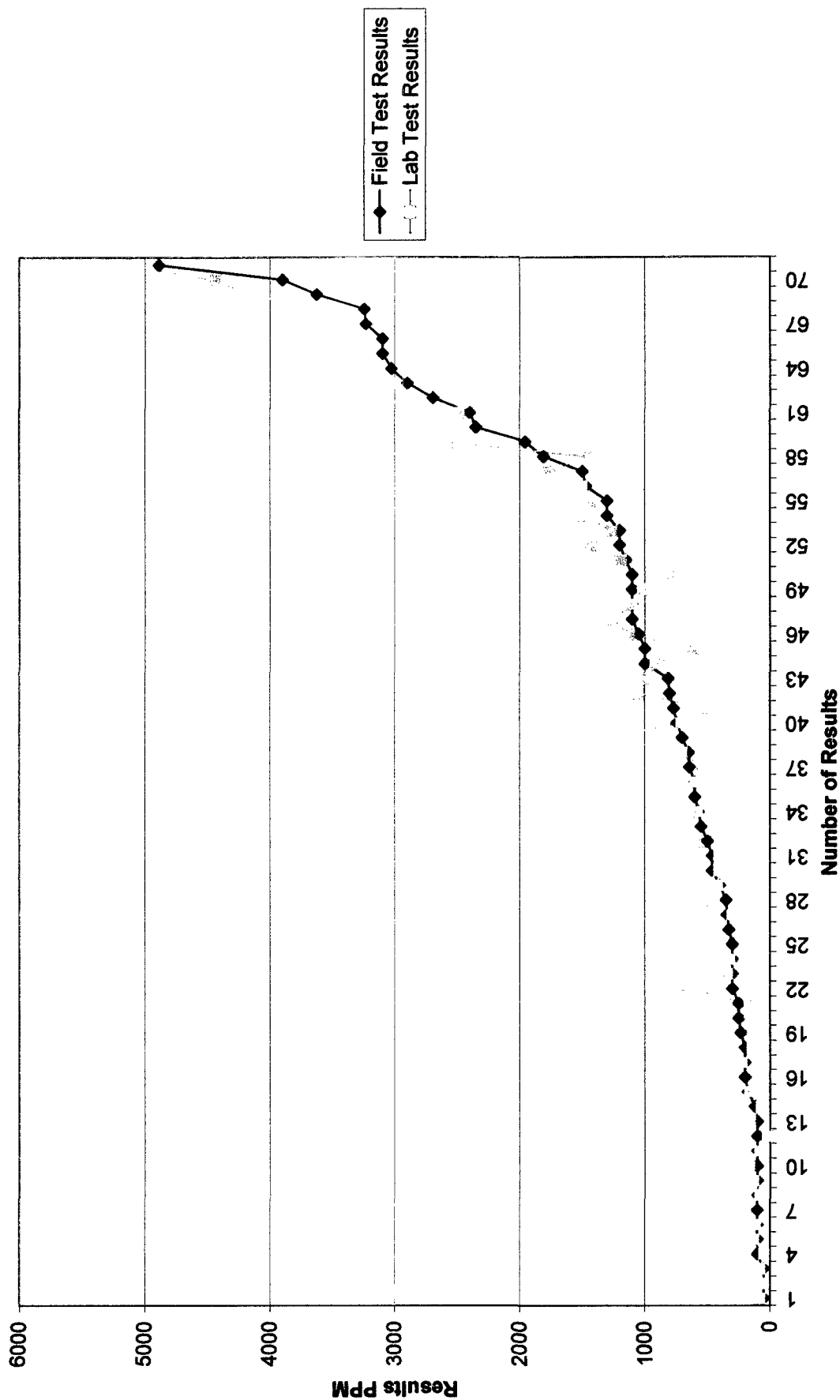
Junction Box	Legal Description			Completion Date	NMOCD Assessment #
	Sec	T	R		
C-25-2	25	18	37	12/6/2002	20
C-33-1	33	18	38	10/28/2002	20
E-5	5	19	38	12/20/2002	20
I-30-1	30	18	38	11/8/2002	20
D-10	10	19	38	11/21/2002	20
D-31-2	31	18	38	12/6/2002	20
E-10-1	10	19	38	12/2/2002	20
Exxon Federal Bowers 'A' EOL	30	18	38	12/6/2002	20
G-19	19	18	38	12/6/2002	20
G-30	30	18	38	11/27/2002	20
G-30-1	30	18	38	12/6/2002	20
H-13	13	18	37	12/6/2002	20
H-30	30	18	38	12/6/2002	20
K-20	20	18	38	11/20/2002	20
Corner H-4	4	19	38	9/1/2002	20
B-3	3	19	38	9/1/2002	20
D-34	34	18	38	9/1/2002	20
E-3-1	3	19	38	9/1/2002	20
E-3	3	19	38	9/1/2002	20
G-3	3	19	38	9/1/2002	20
H-4-1	4	19	38	9/1/2002	20
H-4	4	19	38	9/1/2002	20
I-33	33	18	38	9/1/2002	20
I-33-1	33	18	38	9/1/2002	20
I-33-2	33	18	38	9/1/2002	20
I-33-3	33	18	38	9/1/2002	20
M-27-1	27	18	38	9/1/2002	20
M-27-2	27	18	38	9/1/2002	20
O-21-2	21	18	38	9/1/2002	20

*(Not
Reported)*

Not
Raffa

O-34	34	18	38	9/1/2002	20
P-28-2	28	18	38	9/1/2002	20
P-33	33	18	38	9/1/2002	20
B-24	24	18	37	11/11/2002	20
B-9	9	19	38	12/4/2002	20
C-25-1	25	18	37	12/6/2002	20
C-33	33	18	38	11/7/2002	20
E-4-2	4	19	38	11/25/2002	20
A-36-1	36	18	38	12/5/2002	20
K-31	31	18	38	12/6/2002	20
K-32-1	32	18	38	12/11/2002	20
E-5-2	5	19	38	12/20/2002	20
O-4	4	19	38	12/20/2002	20
I-9-1	9	19	38	12/20/2002	20
J-32	32	18	38	12/20/2002	20
K-32	32	18	38	12/20/2002	20
K-29	29	18	38	12/20/2002	20
E-5-1	5	19	38	12/20/2002	20
Tract 5 EOL	9	19	38	12/20/2002	20
C-9	9	19	38	12/20/2002	20
P-25	25	18	37	12/20/2002	20
E-29	29	18	38	12/20/2002	20
B-9-2	9	19	38	12/20/2002	20
E-4-1	4	19	38	12/20/2002	20
O-32	32	18	38	12/30/2002	20
Hardin 'B' EOL	18	18	38	12/30/2002	20
H-32	32	18	37	12/20/2002	20
Graham State 'A' EOL	24	18	37	12/30/2002	20

Lab vs Field Test Results on Jct. Boxes



Lab vs Field Chloride Test Results

Number of Samples	Location	Date	Bottom, Sidewalls, or Boring	Field Test Results	Lab Test Results
1	BD Jct. P-16-2	1/2/2002	Sidewalls 3'	50	80
2	BD Jct. P-16-2	1/2/2002	Bottom 5'	50	48
3	BD Jct. P-16-4	1/2/2002	Bottom 4'	50	80
4	BD Jct. N-15 North Box	1/25/2002	Soil Boring @ 25'	100	48
5	BD Jct. N-15 South Box	1/2/2002	Bottom 5'	100	128
6	BD Jct. B-22-3	1/2/2002	Sidewalls 3'	100	112
7	BD Jct. B-22-3	1/2/2002	Bottom 6'	100	192
8	BD Jct. P-16-4	1/2/2002	Sidewalls 3'	100	80
9	BD Texaco 'S' EOL	1/10/2002	Sidewalls 2.5'	100	131
10	BD Jct. G-22	1/2/2002	Sidewalls 3'	100	160
11	BD Jct. G-22	1/2/2002	Bottom 4'	100	80
12	EME Jct. B-32	3/19/2002	Soil Boring @ 20'	100	22
13	EME Jct. B-18	2/9/2002	Sidewalls 6'	100	154
14	EME Jct. M-34	3/7/2002	Soil Boring @ 35'	120	71
15	BD Jct. P-16-1	1/2/2002	Sidewalls 2'	175	160
16	BD Jct. H-22	1/2/2002	Bottom 7'	200	98
17	EME Jct. B-18	2/9/2002	Bottom 7'	200	222
18	EME Trio Persons	2/4/2002	Vertical Extent @ 11'	200	142
19	BD Jct. N-29-2	11/7/2002	Bottom 20'	233	142
20	BD Jct. H-22	1/2/2002	Sidewalls 4'	250	166
21	EME Trio Persons	2/4/2002	Sidewalls 5'	250	168
22	BD Jct. N-15 South Box	1/2/2002	Sidewalls 3'	300	656
23	BD Jct. P-16-3	1/28/2002	Sidewalls 5'	300	337
24	BD Texaco 'S' EOL	1/10/2002	Bottom 3'	300	319
25	EME Jct. M-34	3/7/2002	Sidewalls 8'	300	414
26	BD Jct. N-29-2	11/7/2002	Sidewalls 15'	328	142
27	BD Jct. N-29-1	11/7/2002	Sidewalls 3'	343	301
28	EME Trio Persons	2/4/2002	Bottom 6'	350	532
29	BD Jct. I-27	10/15/2002	Remediated Soil	400	417
30	BD Jct. N-29-1	11/7/2002	Remediated Soil	461	408

Number of Samples	Location	Date	Bottom, Sidewalls, or Boring	Field Test Results	Lab Test Results
31	BD Jct. N-29-2	11/7/2002	Remediated Soil	461	408
32	EME Jct. M-34	3/7/2002	Bottom 9'	500	606
33	BD Jct. B-22-2	1/2/2002	Bottom 5'	550	224
34	BD Jct. N-29	11/22/2002	Soil Boring @ 90'	570	576
35	BD Jct N-29 Vent	12/30/2002	Bottom 20'	599	478
36	EME Jct. B-32	3/19/2002	Sidewalls 7'	600	595
37	EME Jct. A-26	12/30/2002	Remediated Soil	641	532
38	EME Jct. B-32	3/19/2002	Bottom 8'	650	698
39	BD Jct. P-16-1	1/2/2002	Bottom 5'	700	1280
40	BD Jct. N-29-1	11/7/2002	Bottom 6'	743	709
41	EME Jct. A-26	12/30/2002	Bottom 10'	769	496
42	BD Jct. E-3	5/20/2002	Sidewalls 8'	800	1050
43	BD Jct. O-17-2	9/19/2002	Bottom 14'	810	975
44	BD Jct. O-17-2	9/19/2002	Sidewalls 13'	1000	922
45	EME Jct. L-1	3/7/2002	Bottom 4'	1000	610
46	BD Jct. G-3	7/27/2002	Bottom 42'	1050	1120
47	BD Jct. N-15 North Box	1/25/2002	Bottom 7'	1100	1260
48	BD Jct. G-3	7/27/2002	Sidewalls 39'	1100	1100
49	BD Jct. F-3	6/7/2002	Bottom 14'	1100	1020
50	EME Jct. L-1	3/7/2002	Sidewalls 3'	1100	798
51	BD Jct. B-22-2	1/2/2002	Sidewalls 3'	1150	1184
52	BD Jct. N-15 North Box	1/25/2002	Sidewalls 4'	1200	1430
53	BD Jct. E-3	5/20/2002	Bottom 9'	1200	1260
54	BD Jct. P-16-3	1/28/2002	Bottom 6'	1300	1500
55	BD Jct. N-16-1	1/4/2002	Sidewalls 4'	1300	1420
56	BD Jct. I-27	10/15/2002	Bottom 15'	1470	1500
57	EME Jct. L-25	2/15/2002	Sidewalls 4'	1500	1760
58	EME Jct. A-26	12/30/2002	Sidewalls 8'	1809	1450
59	BD Chevron Cole 'A'	11/14/2002	Bottom	1956	2560
60	BD Jct. I-27	10/15/2002	Sidewalls 15'	2350	2500
61	BD Jct. N-16-1	1/4/2002	Bottom 6'	2400	2480

Number of Samples	Location	Date	Bottom, Sidewalls, or Boring	Field Test Results	Lab Test Results
62	BD Jct. N-29	11/22/2002	Soil Boring @ 60'	2696	3190
63	BD Jct. N-29	11/22/2002	Soil Boring @ 70'	2899	3010
64	BD Chevron Cole 'A'	11/14/2002	Sidewalls	3029	3230
65	BD Jct. F-3	6/7/2002	Sidewalls 12'	3100	3630
66	EME Jct. L-25	2/15/2002	Bottom 5'	3100	3830
67	BD Jct. N-29	11/22/2002	Soil Boring @ 84'	3234	3460
68	BD Jct. N-29	11/22/2002	Soil Boring @ 50'	3245	3630
69	BD Jct. N-29	11/22/2002	Soil Boring @ 40'	3626	4160
70	BD Jct. N-29	11/22/2002	Soil Boring @ 80'	3899	4430
71	BD Jct N-29 Vent	12/30/2002	Sidewalls 17'	4889	5140

Lab vs Field Test Results on Jct. Boxes

