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GENERAL CORRESPONDENCE

YEAR(S):

2004-2002

Hansen, Edward J., EMNRD

From: Price, Wayne, EMNRD

Sent: Wednesday, December 20, 2006 10:16 AM

To: lpg@texerra.com

Cc: Kristin Pope; Carolyn Haynes; Hansen, Edward J., EMNRD

Subject: RE: Rice Operating Co. - Rule 19 letter

Your request is hereby respectfully denied because of the amount of time that has already lapsed.

PS: In the future please cc ED Hansen of our staff on all submittals.

From: L. Peter Galusky, Jr. P.E. [mailto:lpg@texerra.com]

Sent: Tuesday, December 19, 2006 1:41 PM

To: Price, Wayne, EMNRD

Cc: Kristin Pope; Carolyn Haynes

Subject: Rice Operating Co. - Rule 19 letter

Wayne,

This is in follow-up to the voice mail message that I left earlier today.

Rice received your letter, dated December 8th, bringing the following sites under Rule 19 requirements:

Rice Vacuum E-2

OCD Case No. 1R0425-01

Rice Vacuum K-35-1

OCD Case No. 1R0425-03

Rice Vacuum N-6-1

OCD Case No. 1R0479

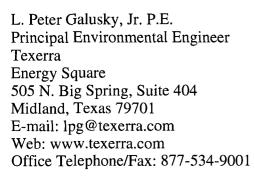
As we received this letter, we were just about to submit to you Corrective Action Plans (CAPs) for these sites, which would address their groundwater impacts. We believe that the measures proposed in these CAPs would provide sufficient remedy to ameliorate their groundwater impacts (which we believe are small and localized), and that the regulatory rigor of Rule 19 requirements would therefore not be necessary.

I therefore wish to appeal to you, to rescind the Rule 19 declarations for these sites until you have had time to consider their CAPs. I can have the CAPs to you by end of day Thursday (December 21st) ... and very likely sooner if you this would be helpful.

I would be most grateful for your consideration of this request.

Sincerely,

Peter Galusky





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

CERTIFIED MAIL RETURN RECEIPT NO. 7000 2510 0007 2763 5244

April 10, 2002

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

JUNCTION BOX UPGRADE SCHEDULE 2002

VACUUM SWD SYSTEM

Lea County, NM

Mr. Price:

Rice Operating Company (ROC) takes this opportunity to submit the Junction Box Upgrade schedule for the year 2002 in the Vacuum SWD System. A list of the scheduled junction boxes and their respective proposed start dates is attached.

ROC is the service provider (operator) for the Vacuum Salt Water Disposal System and has no ownership of any portion of the pipelines, wells or facilities. The Vacuum SWD 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 has scheduled 5 sites in the Vacuum SWD System to complete in 2002. The AFE for this work have been approved by System Partners.

If you have any questions, please let me know.

RICE-OPERATING COMPANY

Donnie Anderson

Project Leader-Environmental

Enclosures

Cc: CDH, file

Mr. Chris Williams NMOCD, District 1 Office 1625 N. French Drive Hobbs, NM 88240

RICE Operating Company

Vacuum SWD-SYSTEM Junction Box UpGrade Project Work Schedule 2002

												
NMOCD	Assessment #	10	10	0	0	0						
Water Well	<1000'	NO	NO	NO	NO	NO						
Water Well Surf Water Water Well	<1000.	NO	NO	NO	ON	ON						
Water Well	< 200'	NO	NO	ON	ON	ON						
Depth	to GW	56	<100	>100	>100	>100						
NORM	level											
scrip	R	35	35	34	34	34						
Legal Descr	-	17	17	18	18	18						
Le	Sec	35	34	12	7	9						
Junction	Вох	K-35-1	L-34 Vent	Exxon "BO" EOL	C-7	N-6-1						
Expected	Start Date	April 2002	April 2002	May 2002	May 2002	May 2002						



CERTIFIED MAIL RETURN RECEIPT NO. 7000 1530 0005 9895 4466

January 18, 2002

Mr. Roger Anderson NM Energy, Minerals, and Natural Resources Oil Conservation Division, Environmental Bureau 1220 S. St. Francis Drive Santa Fe, NM 87505

RE:

NOTIFICATION OF GROUNDWATER IMPACT

EUNICE MONUMENT EUMONT (EME VACUUM

Lea County, NM

Mr. Anderson:

Rice Operating Company (ROC) takes this opportunity to notify the Director of the NMOCD, Environmental Bureau of groundwater impact in accordance with NM Rule 116. The attached document contains a list of the sites that qualify for this notification. The remediation of these sites may fall under NM Rule 19 procedures.

ROC is the service provider (operator) for the EME, Vacuum and Justis Salt Water Disposal Systems and has no ownership of any portion of the pipelines, wells or facilities. The EME, Vacuum and Justis Systems are owned by a consortium of oil producers, System Partners, who provide all operating capital on a percentage ownership/usage basis. Replacement/closure projects may require System Partner AFE approval and work begins as funds are received.

Please accept this notification for the attached sites.

RICE OPERATING COMPANY

Donnie Anderson Project Leader-Environmental

Attachment – Site Listings Cc: LBG, CDH, SC, file

Mr. Chris Williams NMOCD, District 1 Office 1625 N. French Drive Hobbs, NM 88240

RICE OPERATING COMPANY GROUNDWATER IMPACT

SYSTEM	SITE NAME	UNIT	SEC	T	R	TDS	BENZENE
EME	P-6	Ρ	6	20S	37E	20248	<0.002
EME	Jct K-33-1	K	33	198	37E	2635	<0.002
EME	Jct M-16-1	М	16	20S	37E	8016	<0.002
EME	Jct N-5	Ν	5	208	37E	2652	<0.002
VACUUM.	(F-35-SWD)	F	35	17S	35E	9425	0.05
VACUUM	6-35 SWD	G	35	178	35E	1284	0.011
JUSTIS	H-2 MW1	Τ	2	26S	37E	1112	<0.002
JUSTIS	H-2 MW2	Н	2	26S	37E	3908	<0.002
JUSTIS	H-2 MW3	Н	2	26S	37E	577	<0.002

