

1R - 427-0

REPORTS

DATE:

2005-2000

RICE Operating Company

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

CERTIFIED MAIL
RETURN RECEIPT NO. 7005 1820 0001 6804 8132

1R0427

March 27, 2006

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

COPY

RE: JUNCTION BOX UPGRADE REPORT for 2005
EME 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 2005. Enclosed is a list of the completed junction boxes and their respective closure/disclosure dates. These boxes are located in the Eunice Monument Eumont (EME) Salt Water Disposal (SWD) System. ROC completed 31 junction box sites in 2005. Junction box upgrades in 2006 will be conducted in conjunction with scheduled line replacements; 35 boxes are expected to be replaced.

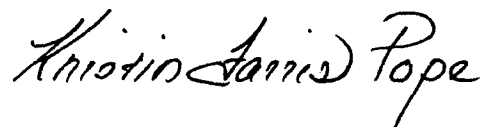
Enclosed are the 2005 results from the PID/BTEX study described in the NMOCD-approved Revised Junction Box Upgrade Work Plan (July 16, 2003). This comparison study is ongoing and data will continue to be collected in 2006. From the data collected thus far, no definitive conclusions can be drawn from the composite methods analyzed. An analysis of ROC's 2005 chloride field tests compared to chloride laboratory analysis is also enclosed. The study of this data continues to validate the accuracy of the chloride field tests employed by ROC.

ROC is the service provider (operator) for the EME 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.

Thank you for your consideration of this Junction Box Upgrade Report for 2005.

RICE OPERATING COMPANY

A handwritten signature in cursive script that reads "Kristin Farris Pope".

Kristin Farris Pope
Project Scientist

Enclosures as stated

cc: LBG, CDH, Rob Roy Industries, file, Mr. Chris Williams
NMOCD, District I Office
1625 N. French Drive
Hobbs, NM 88240

2005 BTEX Study

Revised Junction Box Upgrade Plan (2003)

System: EME
Site: Amerada St. 'Q' EOL

Date: 11/29/2004
Sampler: Joe Gatts

Laboratory: Environmental Lab
of Texas

Location	Component Sample	PID reading (ppm)	FIELD COMPOSITE (mg/kg)			
			Benzene	Toluene	Ethyl Benzene	Total Xylenes
bottom composite at 12 ft BGS	1	102.6	0.0223	0.280	0.806	3.104
	2	104.7				
	3	468.0				
	4	172.0				
	5	16.6				
			LAB COMPOSITE (mg/kg)			
			0.0201	0.243	0.811	2.706

Field PID tests <100 ppm are considered final for BTEX. If PID is >100 ppm, the components of the BTEX composite sample will be collected individually and will be composited under laboratory conditions to prevent excessive volatilization. A 15-box, 30-sample study will be made to compare field-compositing with lab-compositing BTEX samples. Composite components are collected in a skewed 'W' pattern.

Revised Junction Box Upgrade Work Plan (July 16, 2003)

Revised Junction Box Upgrade Plan (2003)

Environmental Lab
of Texas

FIELD COMPOSITE (mg/kg)			
0.122	0.486	4.05	5.958
LAB COMPOSITE (mg/kg)			
0.492	1.09	10.4	13.27

Field PID tests <100 ppm are considered final for BTEX. If PID is >100 ppm, the components of the BTEX composite sample will be collected individually and will be composited under laboratory conditions to prevent excessive volatilization. A 15-box, 30-sample study will be made to compare field-compositing with lab-compositing BTEX samples. Composite components are collected in a skewed "W" pattern.

2005 BTEX Study

Revised Junction Box Upgrade Plan (2003)

System: EME
Site: Gilluly 'B' boot

Date: 9/16/2004
Sampler: Joe Gatts

Laboratory: Environmental Lab
of Texas

Location	Component Sample	PID reading (ppm)	FIELD COMPOSITE (mg/kg)			
			Benzene	Toluene	Ethyl Benzene	Total Xylenes
bottom composite at 12-18 ft BGS	1	16.9	<0.025	<0.025	0.554	0.2029
	2	150.0				
	3	331.0				
	4	363.0				
	5	34.3				
			LAB COMPOSITE (mg/kg)			
			<0.025	<0.025	0.0626	0.2368

Field PID tests <100 ppm are considered final for BTEX. If PID is >100 ppm, the components of the BTEX composite sample will be collected individually and will be composited under laboratory conditions to prevent excessive volatilization. A 15-box, 30-sample study will be made to compare field-compositing with lab-compositing BTEX samples. Composite components are collected in a skewed 'W' pattern.

Revised Junction Box Upgrade Work Plan (July 16, 2003)

2005 BTEX Study

Revised Junction Box Upgrade Plan (2003)

System: Justis
Site: D-1 vent

Date: 12/7/2004
Sampler: Joe Gatts

Laboratory: Environmental Lab
of Texas

Location	Component	PID reading (ppm)	FIELD COMPOSITE (mg/kg)			
			Benzene	Toluene	Ethyl Benzene	Total Xylenes
bottom composite at 12 ft BGS	1	1523.0	0.0435	0.740	4.62	10.82
	2	18.2				
	3	219.0				
	4	0.1				
	5	0.1				

LAB COMPOSITE (mg/kg)		
0.0942	1.47	7.24
18.56		

FIELD COMPOSITE (mg/kg)				
4-wall composite		0.0181	0.181	1.59
		267.0		4.023
LAB COMPOSITE (mg/kg)				
	<0.025	0.0981	0.579	1.555

Field PID tests <100 ppm are considered final for BTEX. If PID is >100 ppm, the components of the BTEX composite sample will be collected individually and will be composited under laboratory conditions to prevent excessive volatilization. A 15-box, 30-sample study will be made to compare field-compositing with lab-compositing BTEX samples. Composite components are collected in a skewed 'W' pattern.

Revised Junction Box Upgrade Work Plan (July 16, 2003)

2005 BTEX Study

Revised Junction Box Upgrade Plan (2003)

System: EME Date: 10/21/2004 Laboratory: Environmental Lab
 Site: Conoco A-17 EOL Sampler: Roy Rascon of Texas

Location	Component	PID reading (ppm)	FIELD COMPOSITE (mg/kg)		
			Benzene	Toluene	Total Xylenes
bottom composite at 13 ft BGS	1	1433.0	<0.025	0.286	1.814
	2	55.4			
	3	4.4			
	4	2.4			
	5	4.5			

LAB COMPOSITE (mg/kg)			
<0.025		0.150	1.326

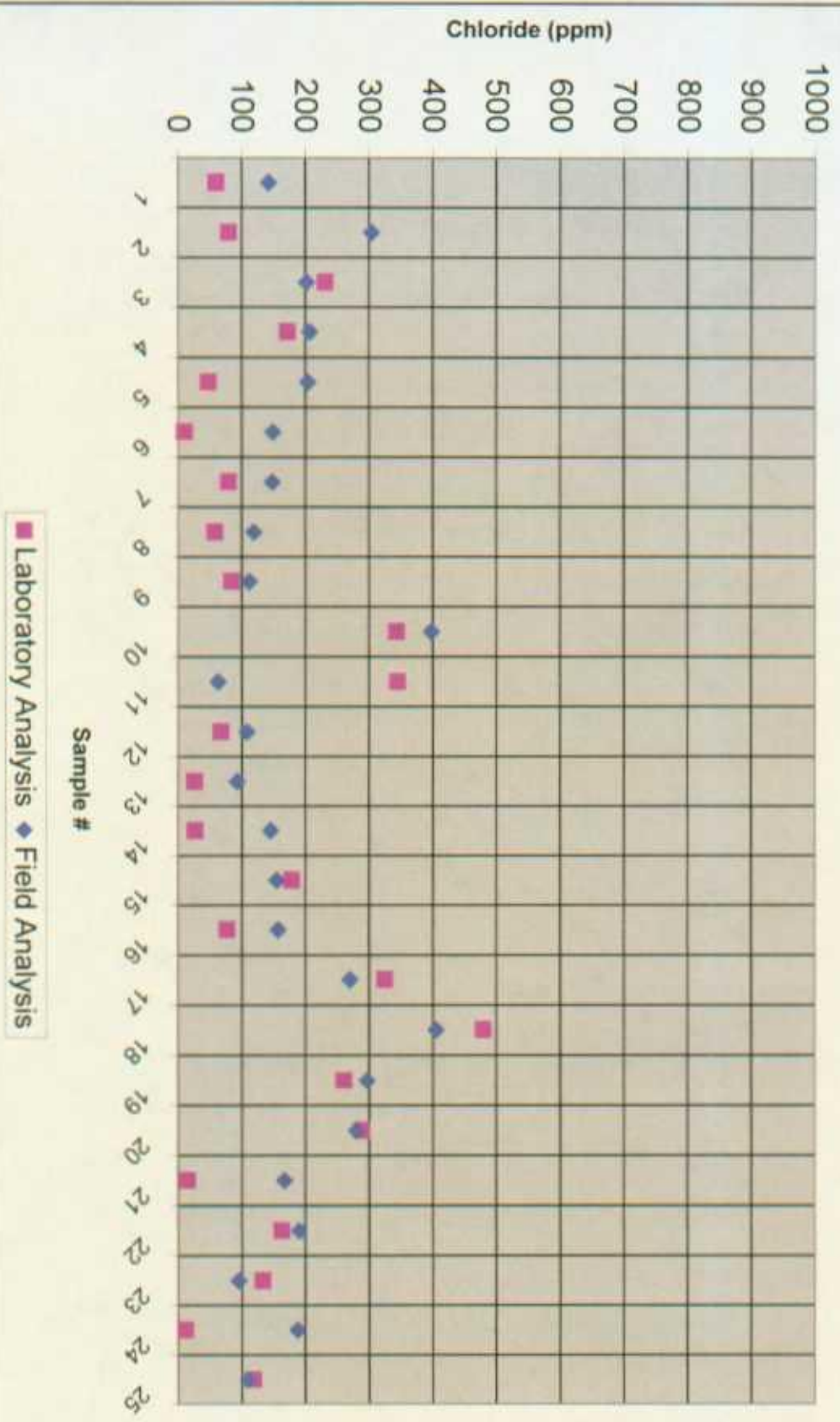
FIELD COMPOSITE (mg/kg)			
4-wall composite		634.0	<0.025
<0.025		0.177	1.551

LAB COMPOSITE (mg/kg)			
<0.025		0.203	2.073

Field PID tests <100 ppm are considered final for BTEX. If PID is >100 ppm, the components of the BTEX composite sample will be collected individually and will be composited under laboratory conditions to prevent excessive volatilization. A 15-box, 30-sample study will be made to compare field-compositing with lab-compositing BTEX samples. Composite components are collected in a skewed 'W' pattern.

Revised Junction Box Upgrade Work Plan (July 16, 2003)

Chloride Field Test vs. Laboratory Analysis 2005



Laboratory vs. Field Chloride Test Results 2005

Sample #	Location	Date	Location of Sample	LABORATORY analysis (ppm)	FIELD analysis (ppm)
1	Vacuum jct. M-25	7/13/05	grab @ 8 ft	59.3	142
2	Vacuum Southwestern VC EOL	8/11/05	bottom grab @ 12 ft	79.2	304
3	Vacuum Exxon St. 'J' EOL	7/13/05	grab @ 9 ft	231	202
4	Vacuum jct. F-30	7/13/05	grab @ 8 ft	172	207
5	EME Amerada Mattern EOL	6/17/05	bottom comp. @ 12 ft	46.9	204
6	Vacuum K-33 vent	9/1/05	bottom grab @ 7 ft	9.63	149
7	Vacuum Chevron 4-27 EOL	7/28/05	bottom grab @ 10 ft	78.9	148
8	EME jct. G-5-1	6/22/05	vertical Grab @ 12 ft	57.4	119
9	EME El Paso EOL	6/22/05	vertical @ 12 ft	83.7	112
10	Vacuum Mack Energy EOL	8/29/05	bottom comp. @ 12 ft	343	398
11	BD jct. A-35	10/4/05	vertical @ 8 ft	344	63
12	Vacuum jct. G-33	9/13/05	vertical @ source 6 ft	67.1	108
13	Vacuum Phillips 'B' Santa Fe EOL	9/6/05	vertical @ source 6 ft	25.7	93
14	Vacuum jct. N-30	9/6/05	vertical @ 13 ft	26.3	145
15	Vacuum OXY Swigart EOL	9/19/05	vertical @ 3 ft	178	155
16	EME jct. K-4	10/11/05	grab @ 7 ft	76.8	157
17	Vacuum jct. C-36	3/16/05	vertical @ 9 ft	324	270
18	EME Amerada St. 'Q' EOL	11/29/04	bottom comp. @ 12 ft	479	405
19	EME Bureson St. 'A' EOL	2/16/05	bottom comp. @ 12 ft	260	297
20	BD jct. K-21-1	6/11/03	vertical @ 12 ft	288	280
21	BD jct. P-26-3	10/25/05	grab @ 9 ft	14.6	167
22	EME jct. P-31	11/9/05	vertical @ source 12 ft	162	190
23	EME jct. P-2	11/7/05	bottom comp @ 12 ft	133	95.5
24	EME Conoco St. A-2A EOL	11/9/05	vertical @ 12 ft	11.6	188
25	Vacuum jct. H-27	7/29/05	vertical @ 7 ft	118	110

DIFFERENT COLORS INDICATE DIFFERENT TECHNICIAN SAMPLERS

RICE Operating Company**EME SWD SYSTEM Junction Box Upgrade Project****2005 Completed Boxes**

	Junction Box Name	Legal Description				Completion Date	OCD Assessment Score	Report Status
		Unit	Sec	T	R			
1	jct. I-19	I	19	20S	37E	9/16/2004	20	Closure
2	jct. A-2-1	A	2	20S	36E	4/27/2004	20	Disclosure
3	jct. B-1-2	B	1	20S	36E	6/25/2004	20	Disclosure
4	jct. C-19	C	19	19S	37E	6/28/2004	10	Closure
5	K-9-1 boot	K	9	20S	37E	7/19/2004	20	Closure
6	Phillips 'B' EOL	F	10	20S	37E	8/4/2004	20	Disclosure
7	jct. N-18	N	18	20S	37E	8/27/2004	20	Disclosure
8	jct. J-34	J	34	19S	36E	10/7/2004	10	Closure
9	jct. A-6	A	6	22S	36E	10/7/2004	0	Closure
10	Gilluly 'B' EOL	A	21	20S	37E	10/11/2004	20	Disclosure
11	GA State 'B' boot EOL	M	16	20S	37E	10/14/2004	20	Closure
12	Amerada JR Phillips EOL	H	1	20S	36E	10/14/2004	20	Disclosure
13	jct. D-1-1	D	1	20S	36E	11/29/2004	20	Closure
14	jct. D-20	D	20	19S	37E	2/21/2005	10	Closure
15	A-34 boot	A	34	19S	36E	2/28/2005	20	Closure
16	State 'Q' EOL	J	16	20S	37E	2/28/2005	20	Disclosure
17	Burleson State A-26	M	26	19S	36E	3/1/2005	10	Closure
18	jct. C-8-2	C	8	20S	37E	3/15/2005	20	Closure
19	jct. P-19	P	19	20S	37E	3/17/2005	20	Closure
20	jct. E-25	E	25	19S	36E	4/5/2005	20	Closure
21	Amerada Mattern EOL	K	20	19S	37E	7/8/2005	20	Closure
22	jct. J-36	J	36	20S	36E	7/11/2005	0	Closure
23	El Paso EOL G-5	G	5	21S	36E	7/11/2005	0	Closure
24	jct. G-5-1	G	5	21S	36E	7/12/2005	0	Closure
25	Amerada St. 'D' boot EOL	C	1	20S	36E	7/14/2005	20	Disclosure
26	jct. K-4	K	4	20S	37E	11/1/2005	20	Closure
27	jct. P-31	P	31	21S	36E	11/29/2005	0	Closure
28	jct. P-2	P	2	20S	37E	11/29/2005	0	Closure
29	Conoco St. A-2A EOL	P	2	20S	37E	11/29/2005	0	Closure
30	jct. N-4-1	N	4	20S	37E	1/11/2006	20	Closure
31	jct. A-3	A	3	20S	37E	3/22/2006	0	Closure

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 1916

March 28, 2005

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 2004
EME 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 2004. Enclosed is a list of the completed junction boxes and their respective closure/disclosure dates. These boxes are located in the Eunice Monument Eumont (EME) Salt Water Disposal System.

ROC is the service provider (operator) for the EME 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 46 junction box sites in 2004. Junction box upgrades in 2005 will be conducted in conjunction with scheduled line replacements; 30-40 boxes are expected to be replaced.

Enclosed are the 2004 results from the PID/BTEX study described in the NMOCD-approved Revised Junction Box Upgrade Work Plan (July 16, 2003). This comparison study is ongoing and data will continue to be collected in 2005.

1R0427-

RICE EME

Thank you for your consideration of this Junction Box Upgrade Report for 2004.

RICE OPERATING COMPANY

A handwritten signature in cursive script that reads "Kristin Farris Pope".

Kristin Farris Pope
Project Scientist

Enclosures

cc: LBG, CDH, Rob Roy Industries, file, Mr. Chris Williams
NMOCD, District I Office
1625 N. French Drive
Hobbs, NM 88240

RICE Operating Company**EME SWD SYSTEM Junction Box Upgrade Project****2004 Completed Boxes**

	Junction Box	Legal Description				Completion Date	NMOCD Assessment #	Report Status
		Unit	Sec	T	R			
1	Jct D-1	D	1	20S	36E	Not Complete	10	Disclosure
2	Jct G-19	G	19	19S	37E	8/12/2003	0	Final
3	Oxy State 'D' EOL	F	32	21S	36E	12/3/2003	0	Final
4	Burgandy L.H. B-31 EOL	J	31	21S	36E	12/30/2003	0	Final
5	B' 30 EOL	M	30	21S	36E	1/23/2004	0	Final
6	P-30 Vent	P	30	21S	36E	1/28/2004	0	Final
7	Jct H-33	H	33	20S	36E	2/10/2004	0	Final
8	Me-Tex Wallace St. EOL	L	3	21S	36E	3/12/2004	10	Final
9	Oxy C-11 EOL	R	2	21S	36E	3/16/2004	0	Final
10	T. Closson EOL	J	6	22S	36E	3/18/2004	0	Closure
11	John H. Hendrix State 'B' EOL	B	29	21S	36E	3/19/2004	0	Final
12	Jct O-35 North	O	35	20S	36E	3/22/2004	0	Final
13	Conoco F-1 EOL	U	1	21S	36E	5/6/2004	0	Final
14	Amerada WE 'F' EOL	N	1	21S	36E	5/21/2004	0	Final
15	Jct O-35 South	O	35	20S	36E	6/1/2004	0	Final
16	BP Arco Phillips St 'A' EOL	N	31	19S	37E	6/1/2004	0	Final
17	Jct G-18	G	18	19S	37E	6/2/2004	10	Disclosure
18	Jct Q-6-2	Q	2	21S	36E	6/7/2004	0	Final
19	Jct O-24-1	O	24	20S	36E	6/16/2004	n/a	Final
20	Oxy Gullully 'A'	O	24	20S	36E	6/16/2004	n/a	Final
21	JR Phillips Boot EOL	D	6	20S	37E	7/1/2004	20	Disclosure
22	Jct M-17	M	17	20S	37E	7/12/2004	20	Final
23	Jct B-7	B	7	20S	37E	7/15/2004	20	Disclosure
24	Jct F-10	F	10	20S	37E	7/28/2004	20	Final
25	Jct E-2	E	2	20S	37E	8/2/2004	20	Disclosure
26	Jct G-19	G	19	20S	37E	8/9/2004	20	Final
27	Jct J-32	J	32	19S	37E	8/10/2004	20	Final
28	Jct J-18	J	18	19S	37E	8/11/2004	10	Final
29	Citation Devonian Vent G-20	G	20	21S	36E	8/12/2004	0	Final
30	A-12 Boot	A	12	20S	36E	8/13/2004	20	Final
31	SEMU EOL	P	15	20S	37E	8/16/2004	10	Disclosure
32	John H. Hendrix Britt EOL	D	18	20S	37E	8/17/2004	20	Disclosure
33	Jct P-24	P	24	20S	36E	8/19/2004	n/a	Final
34	Jct F-18	F	18	20S	37E	8/24/2004	20	Disclosure
35	N-18 Boot	N	18	20S	37E	8/31/2004	20	Disclosure
36	Jct J-1	J	1	20S	36E	9/6/2004	20	Disclosure
37	Jct I-13	I	13	20S	36E	9/10/2004	20	Disclosure
38	Jct E-26	E	26	19S	36E	9/21/2004	10	Final
39	U-6-2 Vent	U	6	21S	36E	9/23/2004	0	Final
40	Amerada Gaither Boot	I	34	19S	36E	10/18/2004	20	Disclosure
41	Jct M-19	M	19	19S	37E	10/27/2004	20	Final
42	K-6 Vent	K	6	22S	36E	11/1/2004	0	Final
43	L-15-1 Vent	L	15	20S	37E	11/3/2004	20	Disclosure
44	Jct H-27-1	H	27	19S	36E	11/12/2004	10	Final
45	Jct B-31	B	31	21S	36E	11/29/2004	0	Final
46	Jct B-26	B	26	19S	36E	3/1/2005	10	Final

2004 BTEX Study

Revised Junction Box Upgrade Plan (2003)

System: EME
Site: jet. G-18

Date: 2/26/2004
Sampler: Gary Stark (ETGI Hobbs)

Laboratory: Environmental Lab
of Texas

Location	Component	PID reading (ppm)	FIELD COMPOSITE (mg/kg)			
			Benzene	Toluene	Ethyl Benzene	Total Xylenes
bottom composite at 12 ft BGS	1	1340.0	3.65	4.15	0.626	2.645
	2	128.0				
	3	1271.0				
	4	15.3				
	5	873.0				

LAB COMPOSITE (mg/kg)			
1.3		2.74	
0.438		2.078	

FIELD COMPOSITE (mg/kg)			
0.044		0.281	
0.265		1.621	

LAB COMPOSITE (mg/kg)			
0.0246		0.191	
0.224		1.307	

Field PID tests <100 ppm are considered final for BTEX. If PID is >100 ppm, the components of the BTEX composite sample will be collected individually and will be composited under laboratory conditions to prevent excessive volatilization. A 15-box, 30-sample study will be made to compare field-compositing with lab-compositing BTEX samples. Composite components are collected in a skewed 'W' pattern.

Revised Junction Box Upgrade Work Plan (July 16, 2003)

2004 BTEX Study

Revised Junction Box Upgrade Plan (2003)

System: BD
Site: jct. C-4-3

Date: 6/22/2004
Sampler: Joe Gatts (ROC)

Laboratory: Environmental Lab
of Texas

Field PID tests <100 ppm are considered final for BTEX. If PID is >100 ppm, the components of the BTEX composite sample will be collected individually and will be composited under laboratory conditions to prevent excessive volatilization. A 15-box, 30-sample study will be made to compare field-compositing with lab-compositing BTEX samples. Composite components are collected in a skewed 'W' pattern.

Revised Junction Box Upgrade Work Plan (July 16, 2003)

Location	Component	PID reading (ppm)	Benzene	Toluene	Ethyl Benzene	Total Xylenes
			FIELD COMPOSITE (mg/kg)			
bottom composite at 12 ft BGS	1	41.3	<0.025	0.123	0.113	0.962
	2	57.0				
	3	947.0				
	4	180.0				
	5	709.0				

FIELD COMPOSITE (mg/kg)						
NORTH Wall Composite	1	226.0	<0.0025	0.0796	0.184	0.958
	2	206.0				
	3	225.0				
	4	774.0				
	5	156.0				

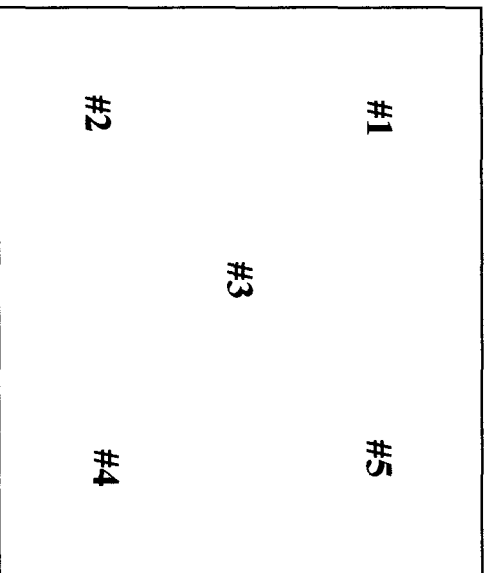
BD
jet. C-4-3

page 2

Location	Component	PID reading (ppm)	Benzene	Toluene	Ethyl Benzene	Total Xylenes
			FIELD COMPOSITE (mg/kg)			
SOUTH Wall Composite	1	4.8	<0.0025	0.0265	0.0433	0.1646
	2	3.0				
	3	0.1				
	4	0.2				
	5	285.0				

FIELD COMPOSITE (mg/kg)						
EAST Wall Composite	1	55.7	<0.0025	0.135	0.126	0.923
	2	244.0				
	3	388.0				
	4	136.0				
	5	178.0				

Location	Component	PID reading (ppm)	Benzene	Toluene	Ethyl Benzene	Total Xylenes
			FIELD COMPOSITE (mg/kg)			
WEST Wall Composite	1	990.0	<0.0025	<0.0025	<0.0025	<0.0025
	2	17.6				
	3	4.1				
	4	5.9				
	5	16.2				
LAB COMPOSITE (mg/kg)			<0.0025	<0.0025	<0.0025	<0.0025



All composite sample components
are collected in this pattern.



2004 BTEX Study

Revised Junction Box Upgrade Plan (2003)

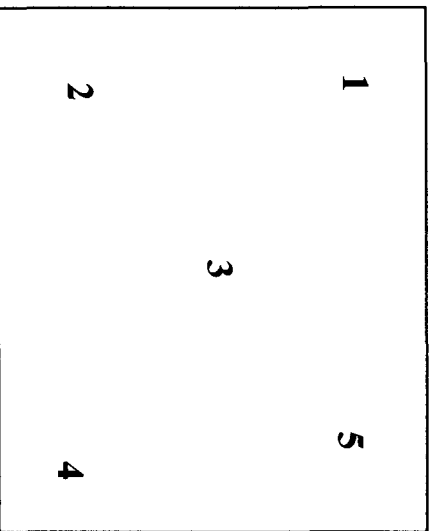
System: EME
Site: jct. P-24

Date: 8/12/2004
Sampler: Joe Gatts (RICE Operating)

Laboratory: Environmental Lab
of Texas

Location	Component	PID reading (ppm)	FIELD COMPOSITE (mg/kg)			
			Benzene	Toluene	Ethyl Benzene	Total Xylenes
bottom composite at 12 ft BGS	1	31.0	0.189	0.587	0.758	2.797
	2	1027.0				
	3	737.0				
	4	853.0				
	5	1206.0				

All composite sample components
are collected in this pattern.



Field PID tests <100 ppm are considered final for BTEX. If PID is >100 ppm, the components of the BTEX composite sample will be collected individually and will be composited under laboratory conditions to prevent excessive volatilization. A 15-box, 30-sample study will be made to compare field-compositing with lab-compositing BTEX samples. Composite components are collected in a skewed 'W' pattern.

Revised Junction Box Upgrade Work Plan (July 16, 2003)

2004 BTEX Study

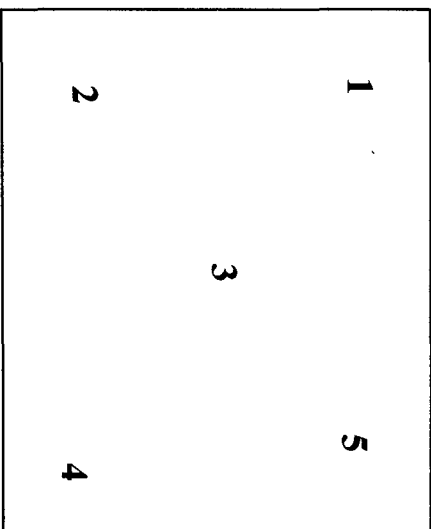
Revised Junction Box Upgrade Plan (2003)

System: EME
Site: JR Phillips EOL

Date: 9/17/2004
Sampler: Rob Elam (Curt's Environmental)

Laboratory: Environmental Lab
of Texas

Location	Component	PID reading (ppm)	FIELD COMPOSITE (mg/kg)			
			Benzene	Toluene	Ethyl Benzene	Total Xylenes
bottom composite at 12 ft BGS	1	916.0	0.0874	0.581	0.524	2.349
	2	432.0				
	3	535.0				
	4	483.0				
	5	743.0				



All composite sample components
are collected in this pattern.

Field PID tests <100 ppm are considered final for BTEX. If PID is >100 ppm, the components of the BTEX composite sample will be collected individually and will be composited under laboratory conditions to prevent excessive volatilization. A 15-box, 30-sample study will be made to compare field-compositing with lab-compositing BTEX samples. Composite components are collected in a skewed 'W' pattern.

Revised Junction Box Upgrade Work Plan (July 16, 2003)

Wayne,

This EME Report contains
the last of the 2004 Jct.
Box submissions. By now
you should have received the
BD, Justis, + Vacuum System
reports.

Kristin Pope

Price, Wayne

From: Price, Wayne
Sent: Thursday, December 09, 2004 10:42 AM
To: Carolyn Doran Haynes (E-mail); Kristin Farris Pope (E-mail)
Cc: Randall Hicks (E-mail); Gil Van Deventer (E-mail)
Subject: Path Forward

Dear Ms. Haynes:

The OCD has logged every ROC site into our RBDM system. I will be sending you this comprehensive list. The list will have case numbers for all of our sites. I would like to see Kristin add those numbers to here spreadsheet if possible. I will be in the process of reviewing all of the closure sites (i.e. green sheet cover) and hope to send you approvals so we can close those sites out. I would also think it would be helpful if ROC would spell out on your spread sheet how each site was being closed. For example if one of the generic plans is or was used please note that, If not then signify type of closure, i.e. case-by-case, etc.

For disclosure sites, I am going to try to let ROC set the priority for these sites, however if we receive a complaint or in OCD's opinion it is a possible threat to public health then we may ask you to address that particular site.

I have already sent you my comments concerning the monument area up-gradient groundwater issue. The vadose zone and groundwater issues will have to be addressed. One thing we might do is set a lower priority on those sites and delay work until we have more data.

The other issue of concern for OCD is where disclosure sites had groundwater contamination and over a period of time this contamination has been reduced below the groundwater standards by dilution. OCD is very concerned that salt density gradient plumes are simply moving off site and thus could degrade down-gradient fresh water sources. OCD has a fiduciary duty to make sure this is not happening. Therefore, ROC will be expected to demonstrate this phenomenon is not happening. OCD will not accept models that demonstrate this unless monitor wells are installed to calibrate the model.

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

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

CERTIFIED MAIL
RETURN RECEIPT NO. 7002 2410 0000 4940 1305

1R0427

March 11, 2004

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 2003
EME 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 2003. Enclosed is a list of the completed junction boxes and their respective closure/disclosure dates. These boxes are located in the Eunice Monument Eumont (EME) Salt Water Disposal System.

ROC is the service provider (operator) for the EME 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 54 junction box sites in 2003. ROC has scheduled 60 sites to complete in 2004. The AFE for this work has been approved by System Partners. Enclosed are the 2003 results from the PID/BTEX study described in the NMOCD-approved Revised Junction Box Upgrade Work Plan (July 16, 2003). This comparison study is ongoing and data will continue to be collected in 2004.

Thank you for your consideration of this Junction Box Upgrade Report for 2003.

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

RICE Operating Company**EME SWD SYSTEM Junction Box Upgrade Project****Completed Boxes 2003 Final Reports and Disclosure Reports**

Junction Box	Legal Description				Completion Date	NMOCD Assessment#	Report Status
	UL	Sec	T	R			
D-25	D	25	20	36	4/8/2002	10	Disclosure
O-24	O	24	20	36	12/19/2002		Disclosure
A-35 EOL	A	35	20	36	1/13/2003	0	Final
K-32	K	32	19	37	1/20/2003	20	Final
K-35	K	35	20	36	1/28/2003	0	Disclosure
H-10-1	H	10	20	36	2/13/2003	20	Final
J-10	J	10	20	36	2/18/2003	20	Disclosure
G-11	G	11	20	36	2/25/2003	20	Disclosure
H-10	H	10	20	36	2/27/2003	20	Disclosure
C-12-2	C	12	20	36	3/3/2003	20	Final
C-12-1	C	12	20	36	3/4/2003	20	Final
O-19	O	19	20	37	3/26/2003	20	Disclosure
Cooper Fed 'D' EOL	E	26	20	36	3/27/2003	0	Final
GM State EOL	H	2	21	35	3/27/2003	10	Final
C-12-1 North	C	12	20	36	3/31/2003	20	Final
F-11	F	10	20	36	4/1/2003	20	Final
State 'F' EOL	M	36	19	36	5/7/2003	0	Final
L-34	L	34	20	36	6/3/2003	0	Disclosure
L-6 Boot	L	6	20	37	7/28/2003	20	Disclosure
P-27 EOL	P	27	20	36	7/28/2003	0	Disclosure
M-35-1 Boot (east)	M	35	19	36	8/1/2003	20	Final
M-35-2 Boot (west)	M	35	19	36	8/1/2003	20	Disclosure
Oil & Gas State 'H' (north)	E	17	20	37	11/21/2003	20	Disclosure
Oil & Gas State 'H' (south)	E	17	20	37	11/21/2003	20	Disclosure
State 'A' EOL	A	8	21	36	11/17/2003	0	Final
A' 20 EOL	J	20	20	37	11/13/2003	20	Disclosure
C-2 Boot	C	2	20	36	6/24/2003	10	Disclosure
P-34	P	34	19	36	10/3/2003	20	Final
F-1	F	1	21	35	11/24/2003	0	Final
A-8 Boot	A	8	21	36	9/25/2003	0	Final
W.E.B. EOL	C	13	21	35	9/18/2003	0	Final
O-25	O	25	19	36	1/13/2003	0	Final
J.H. Day EOL	K	6	22	36	12/16/2003	20	Final
I-9-1	I	9	21	36	9/30/2003	0	Final
E-30	E	30	21	36	1/23/2003	0	Final
H-12	H	12	21	35	8/26/2003	0	Final
M-10-1	M	10	21	36	10/30/2003	0	Final
Felton 'A' EOL	F	28	21	36	8/26/2003	0	Final
G-18	G	18	20	37	11/24/2003	20	Final
E-35	E	35	20	36	1/13/2004	0	Final
B-13 Boot	B	13	21	35	12/30/2003	0	Final
Chevron Orcutt EOL	A	25	21	35	Oct-03	0	Final
H-29	H	29	21	36	10/27/2003	0	Final
N-11	N	11	21	36	9/12/2003	0	Disclosure
K-18	K	18	19	37	12/12/2003	10	Final
C-33	C	33	20	36	8/1/2003	0	Disclosure
I-12	I	12	21	35	10/17/2003	0	Final
Citation 'C' EOL	H	24	21	35	10/8/2003	0	Final

[illegible]

2003 BTEX Study

Revised Junction Box Upgrade Plan (2003)

System: EME Date: 10/27/2003 Laboratory: Environmental Lab
 Site: jct. I-9 Sampler: Gary Stark (ETGI Hobbs) of Texas

Location	Component	PID reading (ppm)	FIELD COMPOSITE (mg/kg)			
			Benzene	Toluene	Ethyl Benzene	Total Xylenes
Bottom Composite at 12 ft BGS	1	0.0	<0.025	<0.025	0.033	0.132
	2	269.0				
	3	0.0				
	4	0.0				
	5	16.7				
			LAB COMPOSITE (mg/kg)			
			<0.025	0.028	0.050	0.244

Field PID tests >100 ppm are considered final for BTEX. If PID is >100 ppm, the components of the BTEX composite sample will be collected individually and will be composited under laboratory conditions to prevent excessive volatilization. A 15-box, 30-sample study will be made to compare field-compositing with lab-compositing BTEX samples. Composite components are collected in a skewed 'W' pattern.

Revised Junction Box Upgrade Work Plan (July 16, 2003)

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

1R0427

RE: JUNCTION BOX UPGRADE REPORT for 2002
EME 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/disclosure dates. These boxes are located in the Eunice Monument Eumont (EME) Salt Water Disposal System.

ROC is the service provider (operator) for the EME 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 39 junction box sites in 2002. ROC has scheduled 40 sites to complete in 2003. The AFE for this work has been approved by System Partners. 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

RICE Operating Company

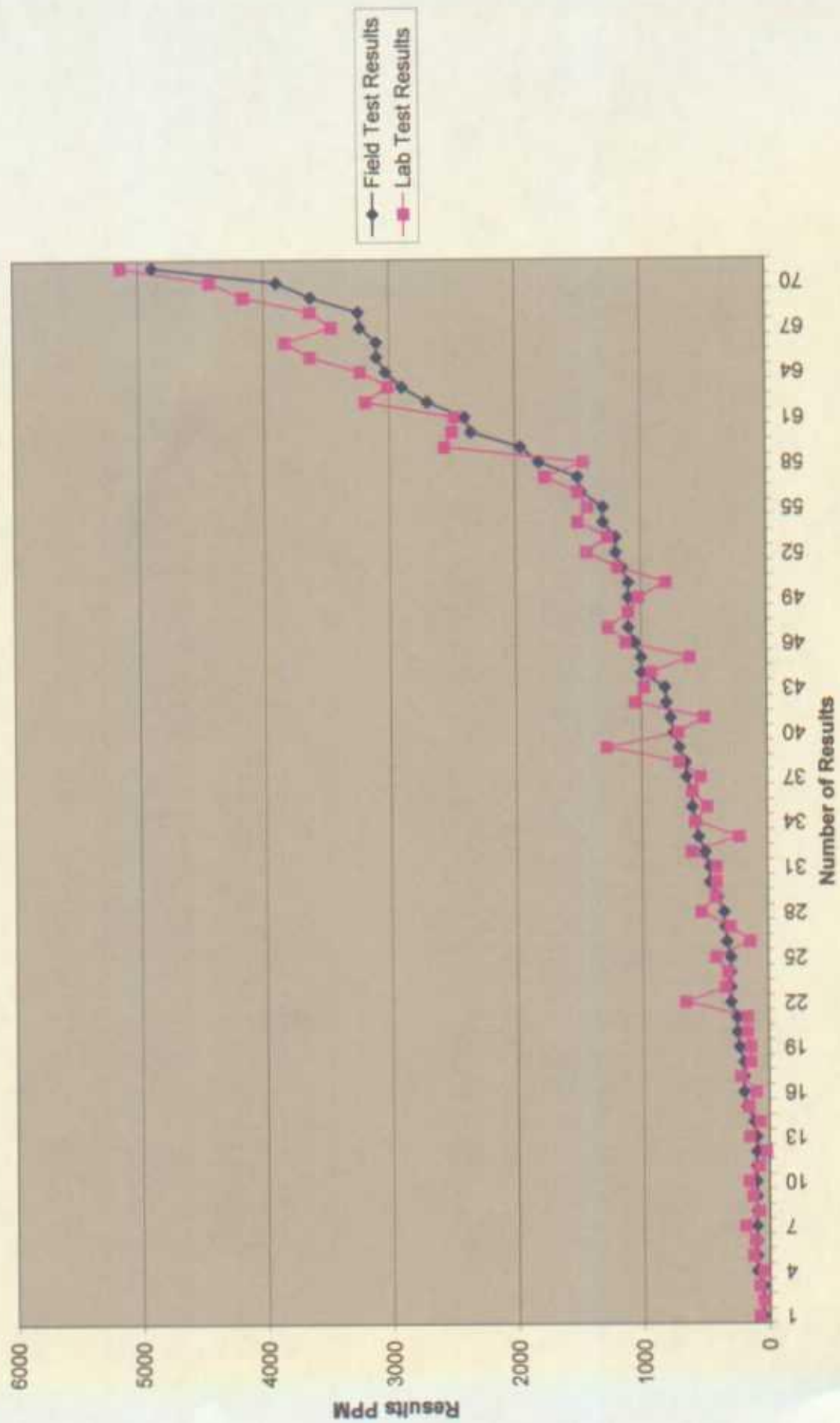
EME SWD SYSTEM Junction Box Upgrade Project

Completed Boxes 2002 Final Report and Disclosure Report

Junction Box	Legal Description			Completion Date	NMOCD Assessment #
	Sec	T	R		
C-25-A	25	20	36	5/1/2002	10
E-2	2	20	36	3/7/2002	20
A-26	26	20	36	12/26/2002	0
M-9	9	20	37	2/19/2002	20
B-32	32	19	37	3/12/2002	20
A-2	2	20	36	2/22/2002	20
B-18	18	19	37	2/8/2002	10
B-33	33	20	36	4/8/2002	0
D-28	28	21	36	7/9/2002	0
G-32	32	19	37	3/14/2002	20
G-36-A	36	19	36	8/6/2002	0
H-2	2	20	37	10/16/2002	0
H-32-1	32	19	37	4/17/2002	20
I-20	20	21	36	5/7/2002	0
J-2	2	20	37	4/19/2002	0
K-25	25	19	36	1/18/2002	20
L-1	1	20	37	3/5/2002	0
L-15	15	20	37	8/9/2002	0
L-18	18	19	37	2/12/2002	10
L-19-2	19	20	37	2/28/2002	20
L-25	25	19	36	2/18/2002	10
O-33	33	19	37	3/27/2002	20
P-13	13	21	35	4/19/2002	0
Trio Persons	27	19	36	2/1/2002	20
M-34	34	19	37	3/5/2002	20
M-9-1	9	20	37	9/9/2002	20
M-9-2	9	20	37	9/9/2002	20
M-9-3	9	20	37	9/9/2002	20
M-9-4	9	20	37	9/9/2002	20
M-9-5	9	20	37	9/9/2002	20
M-9-6	9	20	37	9/9/2002	20
N-4-1	4	20	37	8/8/2002	20
M-16-1	16	20	37	1/22/2003	20

K-33-1	33	19	37	1/21/2003	20
N-5	5	20	37	1/23/2003	20
Marathon Barber EOL	5	20	37	1/21/2003	20
A-20	20	20	37	1/22/2003	20
K-6	6	20	37	1/22/2003	20
P-13 EOL	13	19	36	4/16/2003	10

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
222	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

180627

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 4510

March 7, 2002

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

RECEIVED
MAR 15 2002
Environmental Bureau
Oil Conservation Division

RE: JUNCTION BOX UPGRADE REPORT for 2001
Eunice Monument Eumont SWD SYSTEM
Lea County, NM

Mr. Price:

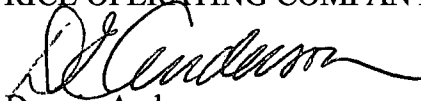
Rice Operating Company (ROC) takes this opportunity to submit the Junction Box Upgrade results for the year 2001. A list of the completed junction boxes and their respective closure dates is attached. These boxes are located in the Eunice Monument Eumont (EME) Salt Water Disposal System.

ROC is the service provider (operator) for the EME Salt Water Disposal System and has no ownership of any portion of the pipeline, well or facility. The EME 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 twenty-nine junction box sites in 2001. ROC has scheduled 64 sites to complete in 2002. The AFE for this work has been approved by System Partners.

Thank you for your consideration of this Junction Box Upgrade Report for 2001.

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

EME SWD SYSTEM Junction Box UpGrade Project

Completed Boxes 2001

Junction Box	Legal Descrip			Completion	NMOCD Assessment #
	Sec	T	R	Date	
N-16-1	16	20	37	01/15/2002	20
P-1	1	21	35	10/30/2001	0
K-36	36	20	36	11/07/2001	20
K-15	15	20	37	08/30/2001	0
M-3-2	3	21	36	08/10/2001	0
M-3-1-A	3	21	36	10/22/2001	0
ARCO FDE	19	21	37	01/29/2001	0
O-17-1	17	20	37	08/31/2001	20
B-1-1	1	20	36	11/26/2001	20
I-35	35	20	36	06/29/2001	0
K-1	1	20	36	04/18/2001	20
J-9	9	20	37	02/15/2001	20
F-29-1	29	19	37	03/01/2001	20
F-29-2	29	19	37	03/01/2001	20
C-1-1	1	20	36	09/18/2001	20
K-32	32	20	37	01/29/2001	10-20
I-1-A	1	20	37	11/28/2001	20
I-1-C	1	20	37	11/28/2001	20
B-6	6	20	37	08/28/2001	20
P-36-2	36	19	36	05/07/2001	20
U-6-1	6	21	36	01/02/2001	0
E-12	12	20	36	11/27/2001	20
H-31	31	19	37	10/18/2001	20
M-10	10	21	36	02/27/2001	0
Q-6-1	6	21	36	01/02/2001	0
D-7	7	21	36	01/11/2001	0
J-10	10	21	36	01/24/2001	0
V-5	5	21	36	01/02/2001	0
L-31	31	20	37	02/07/2001	10

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 4442

January 18, 2002

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

RE: JUNCTION BOX UPGRADE REPORT for 2001
Eunice Monument Eumont SWD SYSTEM
Lea County, NM

Mr. Price:

Rice Operating Company (ROC) takes this opportunity to submit the Junction Box Upgrade results for the year 2001. A list of the completed junction boxes and their respective closure dates is attached. These boxes are located in the Eunice Monument Eumont (EME) Salt Water Disposal System.

ROC is the service provider (operator) for the EME Salt Water Disposal System and has no ownership of any portion of the pipeline, well or facility. The EME 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 twenty-nine junction box sites in 2001. ROC has scheduled 50 sites to complete in 2002. The AFE for this work have been approved by System Partners.

Thank you for your consideration of this Junction Box Upgrade Report for 2001.

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

120427

SHOULD there
be refund
pay 03/07/02

RICE Operating Company

EME SWD SYSTEM Junction Box UpGrade Project

Completed Boxes 2001

Junction Box	Legal Descrip			Completion	NMOCD Assessment #
	Sec	T	R	Date	
N-16-1	16	20	37	01/15/2002	20
P-1	1	21	35	10/30/2001	0
K-36	36	20	36	11/07/2001	20
Conoco Britt B15	15	20	37	08/30/2001	0
M-3-2	3	21	36	08/10/2001	0
M-3-1-A	3	21	36	10/22/2001	0
JCT F-19	19	21	37	07/26/2001	0
O-17-1	17	20	37	08/31/2001	20
B-1-1	1	20	36	11/26/2001	20
I-35	35	20	36	06/29/2001	0
K-1	1	20	36	04/18/2001	20
J-9	9	20	37	02/15/2001	20
F-29-1	29	19	37	03/01/2001	20
F-29-2	29	19	37	03/01/2001	20
C-1-1	1	20	36	09/18/2001	20
K-32	32	20	37	01/29/2001	10-20
I-1-A	1	20	37	11/28/2001	20
I-1-C	1	20	37	11/28/2001	20
B-6	6	20	37	08/28/2001	20
P-36-2	36	19	36	05/07/2001	20
U-6-1	6	21	36	01/02/2001	0
E-12	12	20	36	11/27/2001	20
H-31	31	19	37	10/18/2001	20
M-10	10	21	36	02/27/2001	0
Q-6-1	6	21	36	01/02/2001	0
D-7	7	21	36	01/11/2001	0
J-10	10	21	36	01/24/2001	0
V-5	5	21	36	01/02/2001	0
L-31	31	20	37	02/07/2001	10

RICE Operating Company

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

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RETURN RECEIPT NO. 7099 3220 0001 9928 4423

March 23, 2001

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

1R0 427

RE: SUMMARY OF ENVIRONMENTAL SUBMISSIONS
ROC, BD, EME, JUSTIS Salt Water Disposal Systems
Lea County, NM

Dear Mr. Price:

Rice Operating Company (ROC) takes this opportunity to review the closure requests that have been submitted to the NMOCD during Year 2000. ROC understands the need to periodically review correspondence, especially since the NMOCD has experienced a major relocation.

ROC is the service provider (operator) for several Salt Water Disposal Systems in Lea County and has no ownership of any portion of pipeline, well or facility. Each 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.

This is a list in order of date of submission of requests that ROC has not received response:

FACILITY	LEGAL DESCRIPTION	DATE
ROC SWD Well Facility P-25	Sec 25-T18S-R37E	January 27, 2000
EME SWD Facility L-21	Sec 21-T21S-R36E	March 20, 2000
BD SWD Facility C-2	Sec 2-T22S-R37E	May 30, 2000
ARCO South Justis Unit F-230	Sec 25-T25S-R37E	November 21, 2000
EME Jct. Box N-4-1 (Reeves Ranch)	Sec 4-T20S-R37E	January 4, 2001

ROC has received approval letters concerning the Junction Box Upgrade Plan and EME SWD Facility M-33 Closure Report, also submitted during Year 2000. The Hobbs SWD System I-9 Release Site is a Rule 19 Event and is currently in discussions of Stage II Revision and the ROC F-29 Facility Redwood Tank and Overflow Pit Closure Project is also in discussion.

As always, thank you for your consideration to review these various work and closure requests. If there are any questions or concerns, please don't hesitate to call.

RICE OPERATING COMPANY



Carolyn Doran Haynes
Operations Engineer

cc: LBG, file,

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

RICE Operating Company

EME SWD SYSTEM Junction Box UpGrade Project Work Schedule

Expected Start Date	Junction Box	Legal Descrip		Depth to GW	Water Well < 200'	Surf Water < 1000'	Water Well < 1000'	NMOCD Assessment #
October 2000	I-35	35	20	36	115-122	NO	NO	0
November 2000	K-1	1	20	36	26	NO	NO	20
December 2000	B-30	30	19	37	17-27-58	NO	NO	20
Jjanuary 2001	J-9	9	20	37	25	NO	NO	20
February 2001	F-29-1	29	19	37	17	NO	NO	20
November 2000	F-29-2	29	19	37	17	NO	NO	20
December 2000	C-1-1	1	20	36	23-27	NO	NO	20
January 2001	K-32	32	20	37	37-80	NO	NO	10-20
February 2001	I-1-A	1	20	37	48	NO	NO	20
March 2001	I-1-C	1	20	37	48	NO	NO	20
April 2001	B-6	6	20	37	23-31	NO	NO	20
April 2001	P-36-2	36	19	36	22-37	NO	NO	20
April 2001	L-20	20	20	37	23-27	NO	NO	20
April 2001	U-6-1	6	21	36	157	NO	NO	0
April 2001	E-12	12	20	36	29-32	NO	NO	20
May 2001	H-31	31	19	37	17	NO	NO	20
Spetember 2000	M-10	10	21	36	120-200	NO	NO	0
October 2000	Q-6-1	6	21	36	157	NO	NO	0
September 2000	F-20	20	22	36	216	NO	NO	0
September 2000	E-4	4	21	37				
May 2001	D-7	7	21	36	157	NO	NO	0
May 2001	J-10	10	21	36	120-200	NO	NO	0
May 2001	V-5	5	21	36	150-200	NO	NO	0
May 2001	L-31	31	20	37	80	NO	Yes	20

RICE Operating Company

EME SWD SYSTEM Junction Box UpGrade Project Work Schedule

Expected Start Date	Junction Box	Legal Descrip Sec T R	Depth to GW	Water Well < 200'	Surf Water <1000'	Water Well <1000'	NMOCD Assessment #
June 2001	N-16-1	16 20 37	15	NO	NO	NO	20
June 2001	P-1	1 21 35					
September 2001	C-12-2	12 20 36	25-29	NO	NO	NO	20
September 2001	K-15	15 20 37	No Wells	NO	NO	NO	
September 2001	K-6	6 20 37	29	NO	NO	NO	20
July 2001	K-36	36 20 36	115	NO	Yes	Yes	20
July 2001	Penroc Cooper Fed D	26 20 36	90-122	NO	NO	NO	0
September 2001	A-2	2 20 36	27-30	NO	NO	NO	20
October 2001	A-20	20 20 37	15-23	NO	NO	NO	20
June 2001	Conoco Britt B15	15 20 37	No Wells	NO	NO	NO	
June 2001	K-15-1	15 20 37	No Wells	NO	NO	NO	
October 2001	M-16-1	16 20 37	15	NO	NO	NO	20
July 2001	M-34	34 19 37	23-31	NO	NO	NO	20
August 2001	M-3-2	3 21 36	120-200	NO	NO	NO	0
August 2001	M-3-1-A	3 21 36	120-200	NO	NO	NO	0
September 2001	ARCO FDE	19 21 36	217	NO	NO	NO	0
September 2001	O-24	24 20 36	30-60	NO	NO	NO	20
August 2001	C-2	2 20 36	27-30	NO	NO	NO	20
July 2001	G-32	32 19 37	12	NO	NO	YES	20
October 2001	A-26-B	26 20 36	107	NO	NO	YES	20
October 2000	N-6	6 21 36	157	NO	NO	NO	0
July 2001	D-28	28 21 36	245	NO	NO	NO	0
October 2001	O-17-1	17 20 37	15-30	NO	NO	NO	20
July 2001	K-33-1	33 19 37	12-30	NO	NO	NO	20
October 2001	N-5	5 20 37	30	NO	NO	NO	20
August 2001	B-1-1	1 20 36	23-26	NO	NO	NO	20

RICE Operating Company

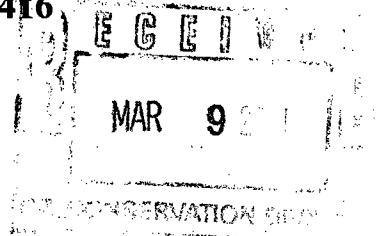
122 West Taylor • Hobbs, New Mexico 88240
Phone: (505)393-9174 • Fax: (505) 397-1471

CERTIFIED MAIL

RETURN RECEIPT NO. 7099 3220 0001 9928 4416

March 5, 2001

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



RE: JUNCTION BOX UPGRADE REPORT for 2000
BD AND EME SWD SYSTEMS
Lea County, NM

Dear Mr. Price:

Rice Operating Company (ROC) takes this opportunity to submit the Junction Box Upgrade results for the Year 2000. These locations are located in the Blinbry Drinkard (BD) and Eunice Monument Eumont (EME) Salt Water Disposal Systems.

ROC is the service provider (operator) for the BD and EME SWD Systems and has no ownership of any portion of pipeline, well or facility. The BD and EME Systems are each 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 seven junction box sites in 2000. ROC has scheduled 75-80 sites to complete in 2001. The AFEs for this work have been approved by System Partners. ROC would like to schedule the End-Of-Year Report for the 2001 work (January 1 to December 31) to be due April 1, 2002, and each subsequent year-end report due the following April 1.

Thank you for your consideration of this Junction Box Upgrade Report for 2001.

RICE OPERATING COMPANY

A handwritten signature in cursive script that reads "Carolyn Doran Haynes".

Carolyn Doran Haynes
Operations Engineer

Enclosures
cc: LBG, file,

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

RICE Operating Company

BD SWD SYSTEM Junction Box UpGrade Project Work Schedule

Expected Start Date	Junction Box	Legal Descrip Sec T R	Depth to GW	Water Well < 200'	Surf Water <1000'	Water Well <1000'	NMOCD Assessment #
September 2000	JCT N-19-N	19 21 37	100+	no	no	no	0
September 2000	JCT N-19-S	19 21 37	100+	no	no	no	0
September 2000	APACHE CK	19 21 37	100+	no	no	no	0
September 2000	JCT K-19	19 21 37	100+	no	no	no	0
September 2000	JCT I-1-A	1 22 36	100+	no	no	no	0
October 2000	JCT I-1-B	1 22 36	100+	no	no	no	0
October 2000	JCT F-32	32 21 37	90-99	no	no	no	10
November 2000	JCT F-19	19 21 37	100+	no	no	no	0
November 2000	JCT M-19	19 21 37	100+	no	no	no	0
November 2000	JCT N-33	33 21 37	90-108	no	no	no	0
November 2000	JCT B-1-1	1 22 36	100+	no	no	no	0
December 2000	JCT B-4-1 2X	4 22 37	90-115	no	no	no	0
December 2000	JCT B-4	4 22 37	90-115	no	no	no	0
December 2000	HNDRX XMAS	17 22 37	64-72	no	no	no	10
December 2000	ARCO D157	12 22 36	124	no	no	no	0
January 2001	JCT O-17	17 22 37	64-72	no	no	yes	20
January 2001	VENT H-4	4 22 37	90-115	no	no	no	0
January 2001	JCT F-21	21 21 37	73-80	no	no	no	10
February 2001	JCT B-20	20 22 37	64	no	no	no	10
February 2001	JCT N-36-1	36 21 36	100+	no	no	no	0
February 2001	VENT N-36-3	36 21 36	100+	no	no	no	0
March 2001	ME-TEX PAN CAN	6 22 37	100+	no	no	no	0
March 2001	VENT H-3	3 22 37	80-100	no	no	no	10
March 2001	ZIA ST BJ	17 22 37	64-72	no	no	yes	20
April 2001	JCT C-13	13 22 36	100+	no	no	no	0