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**GENERAL
CORRESPONDENCE**

**YEAR(S):
2007**

R. T. HICKS CONSULTANTS, LTD.

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

April 11, 2007

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

RECEIVED

APR 13 2007

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

RE: Investigation Characterization Plan: T18S R38E
O-5 Vent Junction Box and Historical Release
Hobbs Salt Water Disposal System

Dear Mr. Price:

On behalf of Rice Operating Company, R.T. Hicks Consultants, Ltd. is pleased to submit this Investigation Characterization Plan (ICP) for the O-5 site within the Hobbs Salt Water Disposal System. Plate 1 is a map showing the location of the site relative to major roads in the area and other relevant sites.

In 2002, during junction box investigation, a historical pipeline leak was discovered and ROC excavated more than 2,000 cubic yards of material from this location. In October 2002, ROC exported over 600 cubic yards to Sundance Services, Inc. The site is backfilled and undergoing re-vegetation.

To measure the efficacy of the vadose zone restoration program and to determine the quality of ground water affected by this site, this ICP proposes to install a detection monitoring well at the site as shown on Figure 1.

Plate 2 shows southeast ground water flow direction in 1960 for the area of interest. Ground water flow in the area in 1996 (Plate 3) is also southeast. In the third quarter of 2006, monitoring wells in the area continue to define a southeast ground water flow direction, as shown in Plate 4. The proposed location will provide the data necessary to determine if ground water at the site exceeds WQCC Standards.



Plate 5 presents the proposed well design. Because the water table in the area is declining over time (about 1 foot per year according to nearby USGS monitoring wells), we have elected to include 15 feet of screen in the saturated zone.

Following two quarters of ground water monitoring, we will

1. Submit the data and analysis with amendment to this ICP and a CAP that may call for soil boring and/or additional ground water sampling, or
2. If ground water monitoring demonstrates that ground water does not exceed WQCC standards, submit the data and analysis with a Final Closure Report the site.

April 11, 2007

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Rice Operating Company (ROC) is the service provider (agent) for the Hobbs Saltwater Disposal System and has no ownership of any portion of pipeline, well, or facility. A consortium of oil producers who own the Hobbs System (System Partners); provide all operating capital on a percentage ownership/usage basis. Major projects require System Partner authorization for expenditures (AFE) approval and work begins as funds are received. We will implement the work outlined herein after NMOCD approval and subsequent authorization from the System Partners.

For all environmental projects, ROC will choose a path forward that:

1. Protects public health.
2. Provides the greatest net environmental benefit.
3. Complies with NMOCD Rules.
4. Is supported by good science.

The last criteria employed when evaluating any proposed remedy or investigative work is confirming that there is a reasonable relationship between the benefits created by the proposed remedy or assessment and the economic and social costs.

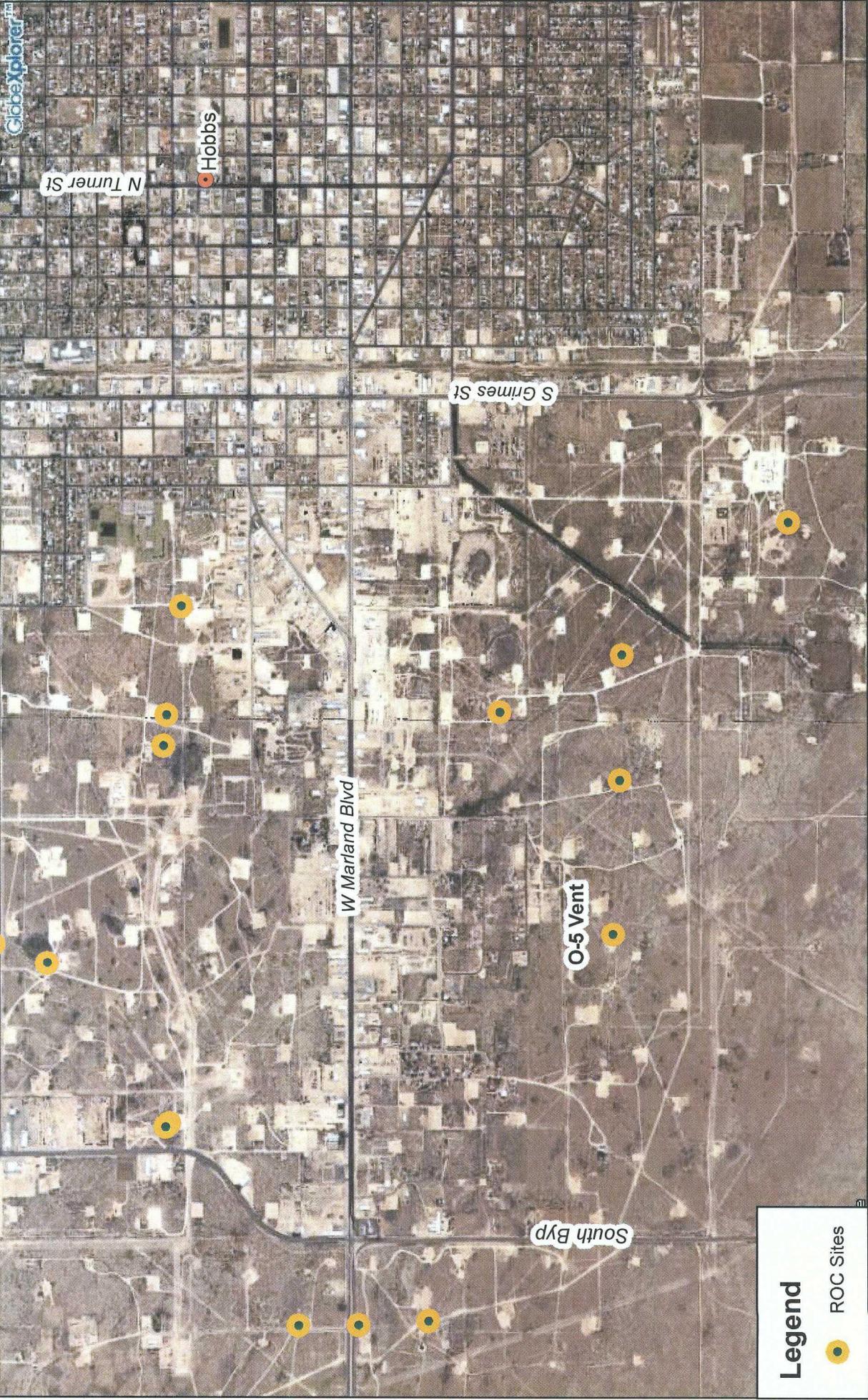
If you have any questions or comments regarding this ICP, please contact Kristin Pope of Rice Operating Company as she has reviewed and approved this submission.

Sincerely,
R.T. Hicks Consultants, Ltd.

A handwritten signature in black ink, appearing to read "Randall T. Hicks". The signature is written in a cursive, flowing style.

Randall T. Hicks
Principal

Copy: Kristin Pope, Rice Operating Company
D.A. Cochran



Legend

 ROC Sites



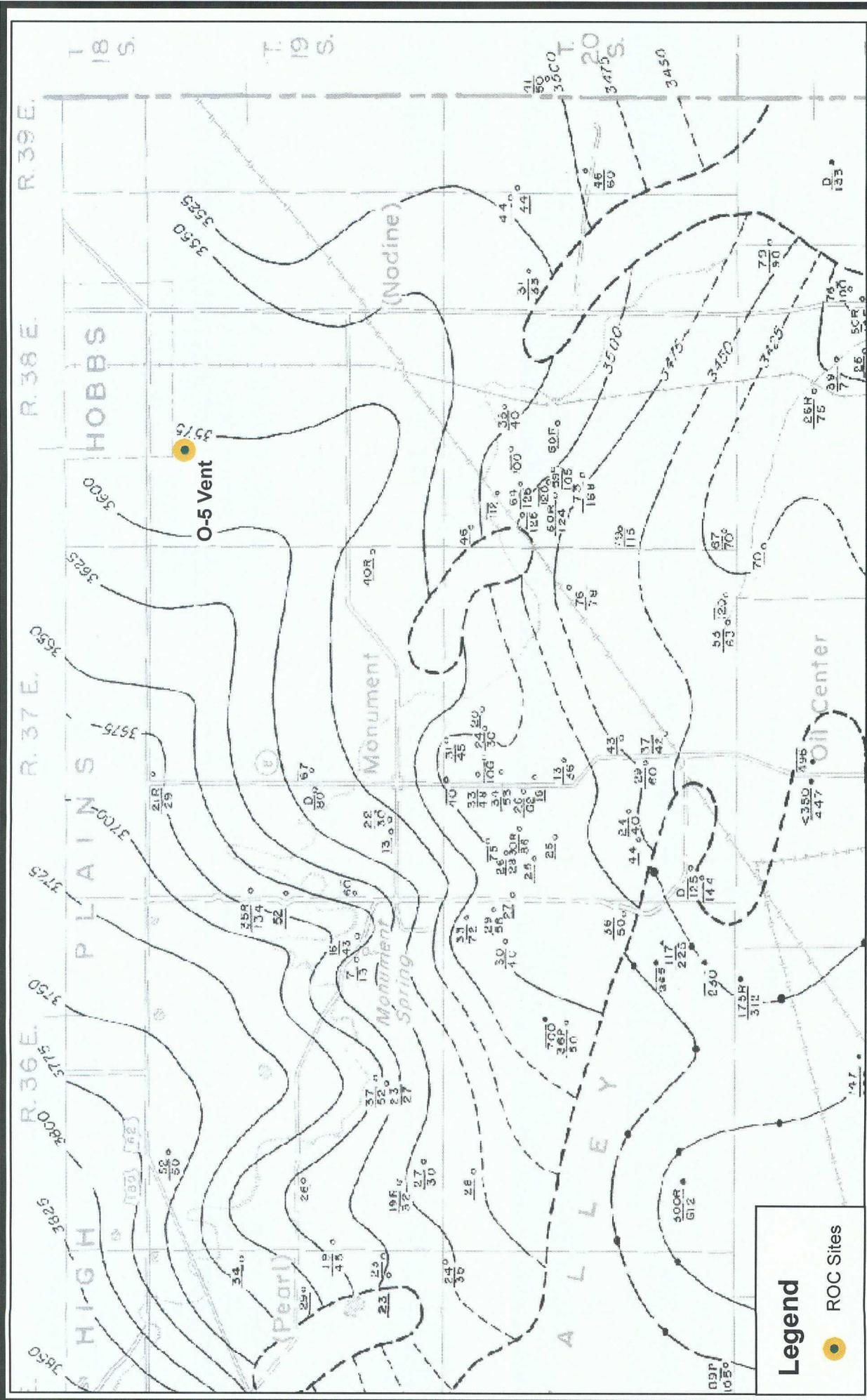
R.T. Hicks Consultants, Ltd
 901 Rio Grande Blvd NW Suite F-142
 Albuquerque, NM 87104
 Ph: 505.266.5004

Location of O-5 Vent relative to Hobbs, New Mexico

Rice Operating Company: Hobbs SWD System

Plate 1

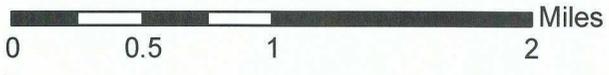
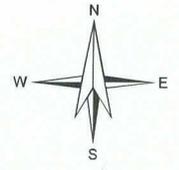
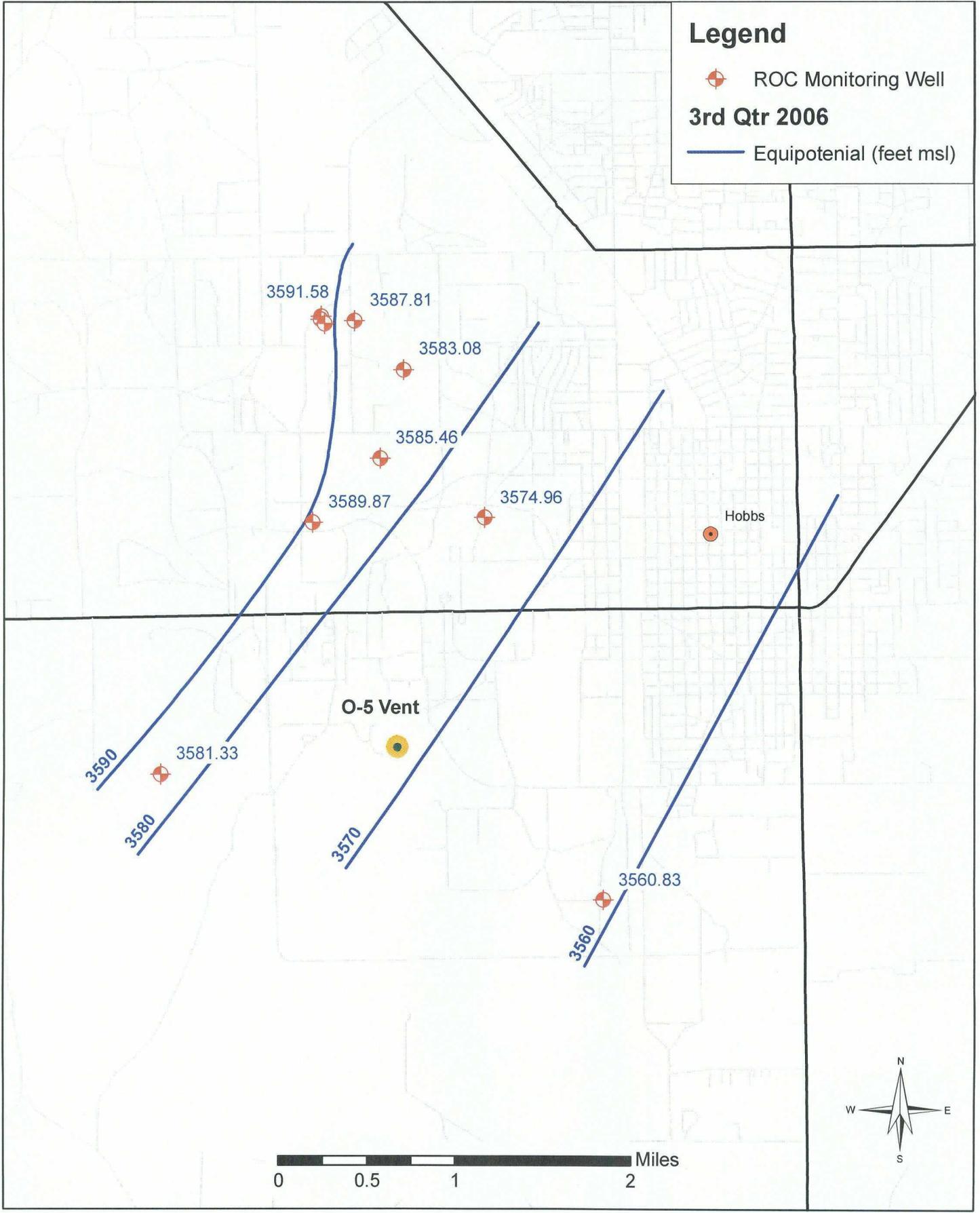
February
2007



<p>R.T. Hicks Consultants, Ltd 901 Rio Grande Blvd NW Suite F-142 Albuquerque, NM 87104 Ph: 505-266-5004</p>	<p>Portion of the potentiometric surface map in the Nicholson and Clebsch (1960) report Rice Operating Company: Hobbs SWD System</p>	<p>Plate 2 February 2007</p>
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Legend

-  ROC Monitoring Well
- 3rd Qtr 2006**
-  Equipotential (feet msl)

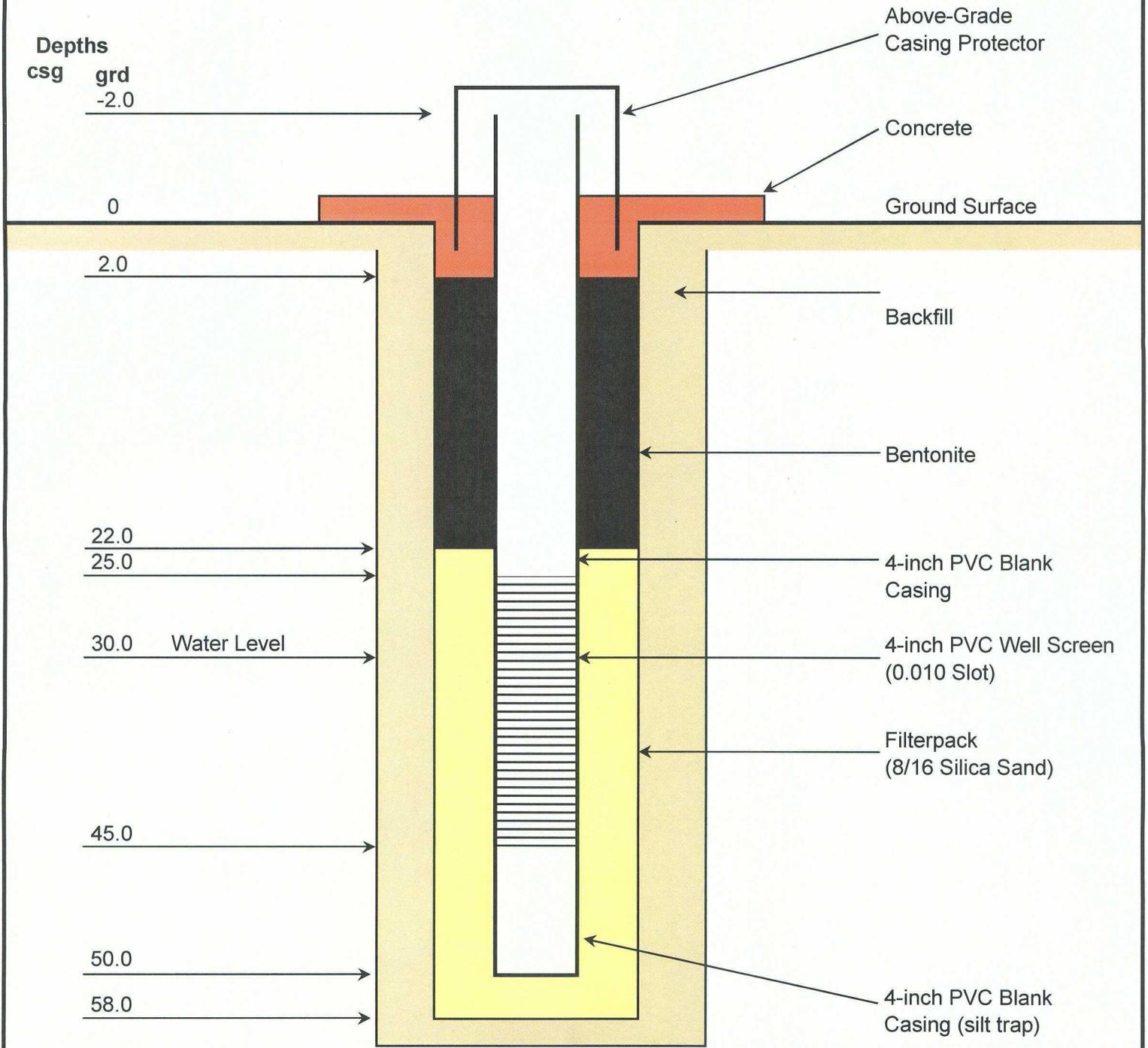


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3rd Qtr 2006 Potentiometric Surface
Rice Operating Company: Hobbs SWD System

Plate 4
February 2007

WELL CONSTRUCTION DIAGRAM



R T Hicks Consultants Ltd	SITE: Typical Monitoring Well		Plate 5: Proposed Detection Well
	DATE: 1/1/07	REV. NO.: 1	
	AUTHOR: RTH	TECH: RTH	
	DRILLER: Proposed	FILE: \Lith (12-06)	

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
							Length	Width	Depth
HOBBS	O-5	O	5	18S	38E	LEA		NO BOX	

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER D. A. COCHRAN OTHER _____

Depth to Groundwater 32 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 10/21/2002 Date Completed 12/12/2002 OCD Witness NO

Soil Excavated 900 cubic yards Excavation Length 60 Width 20 Depth 27 feet

Soil Disposed 396 cubic yards Offsite Facility SUNDANCE Location EUNICE

FINAL ANALYTICAL RESULTS: Sample Date 11/4/2002 Sample Depth 27'

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	<0.025	<0.025	<0.025	<0.025	<10	<10	354
BOTTOM	<0.025	<0.025	<0.025	<0.025	<10	<10	301

General Description of Remedial Action: Delineated vertically to 27' bgs. The TPH

declined to <10 ppm and chlorides to 300 ppm. Fresh soil was blended with remediated soil (14.3 ppm TPH) and used to backfill the excavation. This site is part of the Hobbs SWD system abandonment.

While working at this junction box, an old pipeline leak was discovered 100' south of the box.

Ground water impact is suspected from the leak site. This pipeline is part of the Hobbs SWD system and will be addressed in conjunction with the system abandonment.

TPH FIELD TESTS

LOCATION	DEPTH	ppm
SIDEWALLS	23'	28
BOTTOM	27'	86
Vertical Trench	8'	15200
	12'	14800
	16'	3870
	20'	2840
	22'	1120

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

DATE May 29, 2003 PRINTED NAME D. E. Anderson

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