1R - 425-0

GENERAL CORRESPONDENCE

YEAR(S):
2009

RICE *Operating Company*
122 West Taylor • Hobbs, NM 88240
Phone: (575) 393-9174 • Fax: (575) 397-1471

CERTIFIED MAIL
RETURN RECEIPT NO. 7008 1140 0001 3072 4505

March 19, 2009

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

RE: JUNCTION BOX UPGRADE REPORT for 2008
VACUUM SWD SYSTEM
Lea County, New Mexico

Mr. Jones:

Rice Operating Company (ROC) takes this opportunity to submit the Junction Box Upgrade results for the year 2008. Enclosed is a list of the completed junction boxes and their respective closure/disclosure dates. These boxes are located in the Vacuum Salt Water Disposal (SWD) System.

ROC completed 22 junction box sites in 2008. Vacuum System Partners have decided to abandon the Vacuum SWD System. In 2009, junction boxes will continue to be evaluated with the objective of abandonment of the System.

Enclosed are the 2008 results (17 sites evaluated with 22 sampling locations) from the PID/BTEX study described in the NMOCD-approved Revised Junction Box Upgrade Work Plan (July 16, 2003). A third-party analysis, conducted by Peter Galusky, Jr. Ph.D. of Texerra, concluded from the data collected thus far that field-composited values tend to produce slightly higher BTEX numbers above the point at which BTEX concentrations become significant. This is likely due to the fact that BTEX is volatile and quickly biodegradable. Peter Galusky, Jr. Ph.D. of Texerra also compared ROC's 2008 chloride field tests to chloride laboratory analyses; the 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 (agent) for the Vacuum 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.

Upgrade/closure projects of this magnitude require System Partner AFE approval and work beings as funds are received. The Vacuum SWD System has been abandoned.

Thank you for your consideration of this Junction Box Upgrade Report for 2008.

RICE OPERATING COMPANY

Hack Conder
Environmental Manager

enclosures as stated

cc: SC, MB, file, Edward Hansen (NMOCD),

Mr. Larry Hill
NMOCD, District I Office
1625 N. French Drive
Hobbs, NM 88240

L. Peter Galusky, Jr. Ph.D., P.G.

Texerra

505 N Big Spring, Suite 404 Midland, Texas 79701
Tel: 432-634-9257 E-mail: lpg@texerra.com

March 10th, 2009

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

Re: Comparison of Field versus Lab Compositing of BTEX soil samples
Rice Operating Company, Junction Box Upgrade Work Plan

Sent via Certified Mail w/ Return Receipt No. 7006 0100 0001 2438 3944

Dear Mr. Jones:

On behalf of Rice Operating Company (ROC) I am submitting the attached comparison and analysis of field versus laboratory soil compositing for soil BTEX samples. This is to address the question of whether it is better to mix multiple samples in the field or to do so in the laboratory in order to produce a composite, representative sample for analysis. This work was undertaken in support of ROC's Junction Box Upgrade Work Plan to ensure the quality of their field analysis program.

In brief, this work indicates that field compositing of soil samples generally gives rise to *slightly* higher BTEX values than does laboratory compositing of multiple samples. This is presumably due to the likelihood that field compositing and packaging of soil samples better preserves sample integrity. It would therefore appear that field compositing would represent the better method of procuring soil samples for subsequent analysis of BTEX.

Please call me if you have any questions or wish to discuss any of the details of this study.

ROC is the service provider (agent) for various Salt Water Disposal Systems (SWDs) and has no ownership of any portion of pipeline, well or facility. The SWD Systems that ROC operates are owned by a consortium of oil producers, System Partners, who provide all operating capital on a percentage ownership/usage basis.

Sincerely,

L. Peter Galusky, Jr. Ph.D.
Principal

Copy: Rice Operating Company,
Edward Hansen (NMOCD) sent certified mail w/ return receipt
No. 7006 0100 0001 2438 3937
Attachment: As noted, above.

Rice Operating Company
Comparison of Field Compositing versus Laboratory Compositing of Soil BTEX Samples[1]

The careful mixing of multiple soil samples is critical in order to produce a representative, composite sample from a respective study area (such as a excavation face or bottom). Field technicians typically take four or five "grab" samples from excavation walls and/or bottom and send each of these to a laboratory for analysis of the composite, or mixed, sample. It would be far simpler, however, to composite such samples in the field. This study was undertaken to determine if field compositing produced results substantially different than laboratory compositing for the analysis of BTEX. Data were provided by Rice Operating Company encompassing 22 sampling locations over the period of 2004 through 2008.

A comparison of lab-composited soil samples versus field-composited soil samples revealed a close correspondence for total BTEX between the two methods (Figure 1).

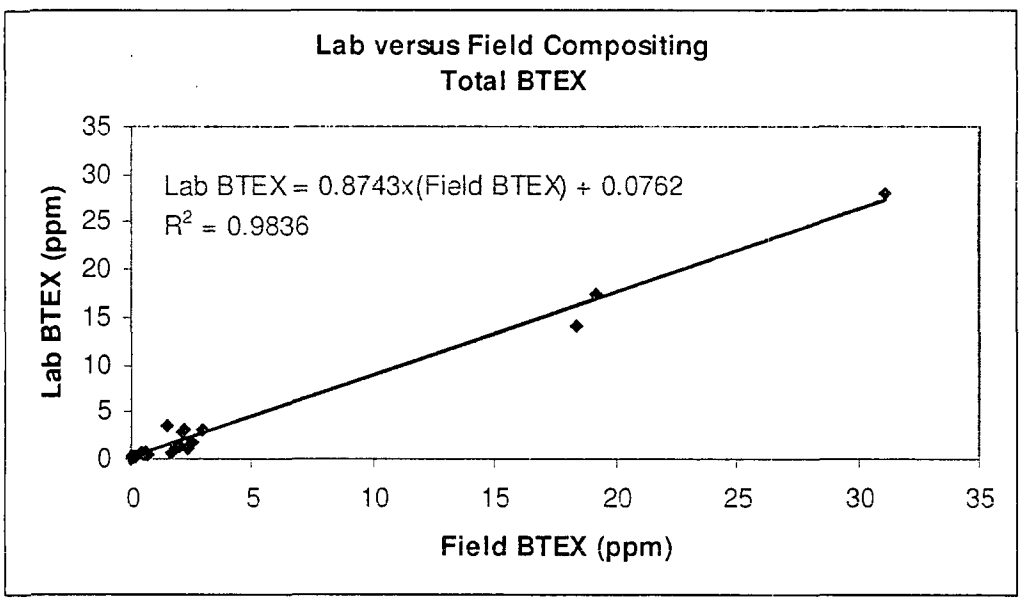


Figure 1 - Laboratory versus field-composited soil samples analyzed for BTEX.

The high R^2 value (0.9836) of the best-fit statistical regression line indicates a high degree of reliability in using the field-compositing method over the range of values observed. Below a "field-composited BTEX" value of 0.61 ppm the "lab-composited BTEX" values are slightly lower. However, above a field-composited BTEX value of 0.61 the lab-composited values run slightly lower. In other words, the field-composited values tended to produce slightly higher BTEX numbers above the point at which BTEX concentrations become significant.

There is a reason for this. BTEX is volatile and quickly biodegradable. The compositing and "packaging" of soil samples in the field minimize the handling and aeration that occur in the laboratory. Thus, field-composited soil samples lose less BTEX to evaporation and/or biodegradation prior to laboratory analysis. In other words, the field compositing and packaging of soil samples better preserves sample integrity, and for this reasons would appear to represent the better method of procuring soil samples for subsequent analysis of BTEX.

[1] Prepared 03-12-09 by L. Peter Galusky, Jr. of Texerra.

L. Peter Galusky, Jr. Ph.D., P.G.

Texerra **505 N Big Spring, Suite 404 Midland, Texas 79701**
Tel: 432-634-9257 E-mail: lpg@texerra.com

March 12th, 2009

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

Re: Comparison of 2008 Field versus Laboratory Measured Soil Chloride Values
Rice Operating Company, Junction Box Upgrade Work Plan

Sent via Certified Mail w/ Return Receipt No. 7006 0100 0001 2438 3944

Dear Mr. Jones:

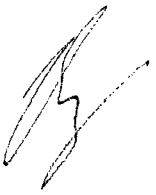
On behalf of Rice Operating Company (ROC) I am submitting the attached comparison and analysis of 2008 field versus laboratory measured soil chloride values. This work was undertaken in support of ROC's Junction Box Upgrade Work Plan to ensure the quality of their field analysis program.

In brief, this work indicates that Rice's 2008 field chloride measurement efforts provided reliable and accurate estimates of the true values.

ROC is the service provider (agent) for various Salt Water Disposal Systems (SWDs) and has no ownership of any portion of pipeline, well or facility. The SWD Systems that ROC operates are owned by a consortium of oil producers, System Partners, who provide all operating capital on a percentage ownership/usage basis.

Please call me if you have any questions or wish to discuss any of the details of this study.

Sincerely,



L. Peter Galusky, Jr. Ph.D.
Principal

Copy: Rice Operating Company,
Edward Hansen (NMOCD) sent certified mail w/ return receipt
No. 7006 0100 0001 2438 3937

Attachment: As noted, above.

Rice Operating Company
Comparison of Laboratory to Field Measured Soil Chloride Concentrations
Based upon 2008 Field Data[1]

A representative sub-sample of 174 pairs of field versus laboratory measured soil chloride values was compared to determine how well field measurements matched laboratory measurements. It is assumed that laboratory measurements better represent the "true" values due to the controlled environment that a laboratory provides. A simple plot of laboratory versus field measured soil chloride values is given below (Figure 1).

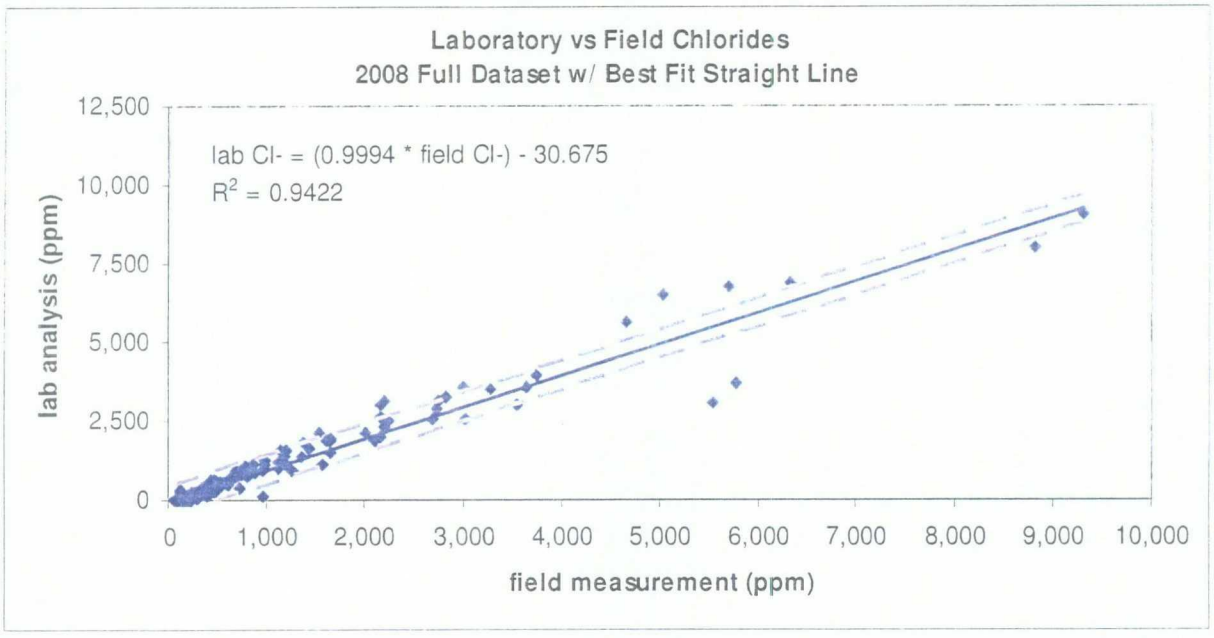


Figure 1 – Laboratory versus field measured soil chloride measurements (n = 174 paired sets). The statistically best-fit regression line is shown solid blue. The standard error of the estimate is 226 ppm. The dashed lines each represent two standard deviations from the regression estimate, encompassing a 95% probability that the true values lies within these bounds.

A straight line fits the data very well ($R^2 = 0.94$), indicating that field measurements are generally reliable (repeatable and consistent). While there is substantially more error in the mid range of the data, the errors are roughly balanced above and below the best-fit line. The intercept of the best-fit line, -30.675, indicates that field measurements overestimate the actual soil chloride values by this amount on average over the range of measurements. The magnitude of this error is small relative to the range of values observed. The slope of the best-fit line, 0.9994, is nearly indistinguishable from perfect one-to-one correspondence. Thus, error does not substantially grow or diminish with the range in chloride values.

Taken together this comparison indicates that Rice's 2008 field chloride measurement efforts provided reliable and accurate estimates of the true values. Further, given the closeness of the best-fit line to a line of perfect correspondence (having a slope of one and an intercept of zero), it is not necessary to "adjust" field measured values by the parameters of the best-fit line, as the effects would be negligible.

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[1] Prepared on 03-12-09 by L. Peter Galusky, Jr. of Texerra.

RICE *Operating* Company
Vacuum SWD System Junction Box Upgrade Project
2008 Completed Boxes

		Legal Description						
	Jct Box Name	Unit	Sec	T	R	Completion Date	OCD Assessment Score	Report Status
1	Jct B-5-2	B	5	18S	35E	4/21/2006	10	Closure
2	I-32 Vent Boot	I	32	17S	35E	3/19/2008	10	Closure
3	Exxon 'K' EOL	I	32	17S	35E	5/21/2008	10	Closure
4	J-32 Vent Boot	J	32	17S	35E	3/19/2008	10	Closure
5	M-33 Vent	M	33	17S	35E	3/20/2008	40	Closure
6	Jct C-31-1	C	31	17S	35E	6/5/2008	10	Closure
7	Jct I-34	I	34	17S	35E	5/15/2008	30	Closure
8	Jct J-34	J	34	17S	35E	5/15/2008	30	Closure
9	Jct N-33-1	N	33	17S	35E	5/22/2008	20	Closure
10	N-33 Vent	N	33	17S	35E	5/22/2008	20	Closure
11	Jct O-33	O	33	17S	35E	2/28/2008	20	Closure
12	Chevron 6-34 EOL	K	34	17S	35E	5/15/2008	30*	Closure
13	Jct O-33-1	O	33	17S	35E	2/28/2008	20	Closure
14	F-32 Vent Boot	F	32	17S	35E	3/19/2008	10	Closure
15	Jct L-34	L	34	17S	35E	4/22/2008	30	Disclosure
16	Marathon 3 Warn St 'B' EOL	G	33	17S	35E	3/27/2008	10	Disclosure
17	Bustamante EOL	F	25	17S	35E	9/12/2005	20	Disclosure
18	G-28 Vent	G	28	17S	35E	4/2/2008	10	Disclosure
19	L-26 Vent	L	26	17S	35E	5/21/2008	10	Disclosure
20	Vent F-34 Boot	F	34	17S	35E	6/8/2008	30	Disclosure
21	Oxy Phillips 'K' EOL	H	27	17S	35E	4/20/2006	10	Disclosure
22	Mobil State 'P' EOL	A	26	17S	35E	2/22/2008	20	Closure