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APPROVALS

YEAR(S):

2004-2003



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

September 30, 2004

Mr. Terry Webster
Noble Energy, Inc.
100 Glenborough, Suite 100
Houston, Texas 77067-3299

**RE: CASE #1R0167
GARY JOHNSON RESIDENCE
HOBBS, NEW MEXICO**

Dear Mr. Webster:

The New Mexico Oil Conservation Division (OCD) has reviewed Noble Energy, Inc's (Noble) September 16, 2004 correspondence titled "CASE NO. 1R0167, REMEDIATION WORK PLAN, GARY JOHNSON PROPERTY, HOBBS, NEW MEXICO" and accompanying September 2004 "REMEDIATION WORK PLAN, GARY JOHNSON RESIDENCE, FORMER MOON A LEASE, LEA COUNTY, NEW MEXICO". These documents contain Noble's work plan for remediation of petroleum contaminated soils and additional delineation of the extent of contamination at Mr. Gary Johnson's property at 1831 Mobile Street in Hobbs, New Mexico. Mr. Johnson's property in Section 28, Township 18 South, Range 38 East was the location of the former Moon "A" tank battery.

The above-referenced work plan is approved with the following condition:

1. Noble shall submit a report on the remediation and investigation activities to the OCD by December 30, 2004. The report shall be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office and shall include:
 - a. A description of the remediation and investigation activities which occurred including conclusions and recommendations.
 - b. A geologic/lithologic log for each soil boring.
 - c. A site map showing the location of the tank battery, spills, pipelines, residences, excavated areas, borings, sample locations, and any other pertinent site features.
 - d. Summary tables of all sampling results and copies of all laboratory analytical data sheets and associated QA/QC data.
 - e. The disposition of all wastes generated.

Please be advised that OCD approval does not relieve Noble of responsibility should the work plan fail to adequately remediate or define the extent of contamination related to Noble's operations, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve Noble of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions, please contact me at (505) 476-3491.

Sincerely,

A handwritten signature in cursive script that reads "William C. Olson".

William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Supervisor
Gary Johnson



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 13, 2004

Mr. Terry Webster
Noble Energy, Inc.
12600 Northborough, Suite 250
Houston, Texas 77067-3299

**RE: CASE #1R0167
GARY JOHNSON RESIDENCE
HOBBS, NEW MEXICO**

Dear Mr. Webster:

The New Mexico Oil Conservation Division (OCD) has reviewed Noble Energy, Inc's (Noble) March 26, 2004 correspondence titled "CASE NO. 13004, GARY JOHNSON PROPERTY" and accompanying March 2004 report titled "PHASE II ENVIRONMENTAL SITE ASSESSMENT, GARY JOHNSON PROPERTY, FORMER MOON A TANK BATTERY LOCATION, LEA COUNTY, NEW MEXICO". These documents contain the results of Noble's recent delineation of the extent of petroleum contamination of soil at Mr. Gary Johnson's property at 1831 Mobile Street in Hobbs, New Mexico. Mr. Johnson's property in Section 28, Township 18 South, Range 38 East was the location of the former Moon "A" tank battery. The above-referenced documents show that the near surface soils in certain areas of the site are contaminated with up to 10,300 mg/kg of total petroleum hydrocarbons (TPH). Noble proposes to conduct further vertical delineation during remedial actions and proposes an alternate remediation level of 1000 mg/kg of TPH for soils at the site.

Noble's proposal to conduct further vertical delineation of contamination during remedial actions is acceptable. In order to implement, Noble's proposal, the OCD requires that Noble submit a remediation work plan to the OCD by September 17, 2004 with a copy provided to the OCD Hobbs District Office.

The justification for an alternate TPH remediation level is not adequate. The site is located on residential land within the city of Hobbs, New Mexico, adjacent to a water well, and located above the Ogallala formation, the sole source drinking water aquifer for the city of Hobbs. If Noble wishes to seek alternate remediation levels, a more detailed risk assessment of remaining contaminants will need to be conducted.

If you have any questions, please contact me at (505) 476-3491.

Sincerely,

A handwritten signature in black ink, appearing to read "W.C. Olson". The signature is fluid and cursive, with the first name "W.C." being more prominent and the last name "Olson" following in a similar style.

William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Supervisor
Gary Johnson



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop
Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

June 16, 2003

Ms. Deb Lambertson
Noble Energy, Inc.
12600 Northborough, Suite 250
Houston, Texas 77067-3299

**RE: CASE #1R0167
GARY JOHNSON RESIDENCE
HOBBS, NEW MEXICO**

Dear Ms. Lambertson:

The New Mexico Oil Conservation Division (OCD) has reviewed Noble Energy, Inc's (Noble) May 27, 2003 correspondence titled "CASE NO. 13004, GARY JOHNSON PROPERTY". This document contains Noble's work plan for delineation of the extent of soil contamination at Mr. Gary Johnson's property at 1831 Mobile Street in Hobbs, New Mexico. Mr. Johnson's property in Section 28, Township 18 South, Range 38 East was the location of the former Moon "A" tank battery which was previously operated by Samedan Oil Corporation and Shell Oil Company and is located within the North Hobbs Unit operated by Occidental Permian Ltd.

The above-referenced work plan is approved with the following conditions:

1. A source sample from each spill area shall be obtained from the soils that exhibit the highest PID reading. The samples shall be analyzed for benzene, toluene, ethylbenzene, toluene (BTEX) and total petroleum hydrocarbons (TPH).
2. The vertical extent of BTEX and TPH contamination above OCD soil remediation guidance levels shall be determined at each spill area.
3. All samples shall be obtained and analyzed using EPA approved methods and quality assurance/quality control (QA/QC) procedures.
4. All wastes generated during the investigations shall be disposed of at an OCD approved facility.

5. Noble shall submit an investigation report to the OCD within 30 days of completion of the field activities. The report shall be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office and shall include:
- a. A description of the investigation activities which occurred including conclusions and recommendations.
 - b. A geologic/lithologic log for each soil boring.
 - c. A site map showing the location of the tank battery, spills, pipelines, residences, borings, sample locations, and any other pertinent site features.
 - d. Summary tables of all sampling results and copies of all laboratory analytical data sheets and associated QA/QC data.
 - e. The disposition of all wastes generated.

Please be advised that OCD approval does not relieve Noble of responsibility should the investigation actions fail to adequately define the extent of contamination related to Noble's operations, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve Noble of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions, please contact me at (505) 476-3491.

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Supervisor
Gary Johnson