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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

12/20/2006

L. Peter Galusky, Jr. P.E.
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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, JUSTIS SWD SYSTEMS
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	P	6	20S	37E	20248	<0.002
EME	Jct K-33-1	K	33	19S	37E	2635	<0.002
EME	Jct M-16-1	M	16	20S	37E	8016	<0.002
EME	Jct N-5	N	5	20S	37E	2652	<0.002
VACUUM	F-35 SWD	F	35	17S	35E	9425	0.05
VACUUM	G-35 SWD	G	35	17S	35E	1284	0.011
JUSTIS	H-2 MW1	H	2	26S	37E	1112	<0.002
JUSTIS	H-2 MW2	H	2	26S	37E	3908	<0.002
JUSTIS	H-2 MW3	H	2	26S	37E	577	<0.002