

AP - 66

**GENERAL
CORRESPONDENCE**

YEAR(S):
2005-2004

R. T. HICKS CONSULTANTS, LTD.

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

December 5, 2005

Wayne Price

NMOCD Environmental Bureau

1220 South St. Francis Drive

Santa Fe, New Mexico 87505

Via E-mail

RE: Junction N-5, T20S, R37E, Section 5, Unit N; NMOCD Case # 1R0427-90

Dear Mr. Price,

On behalf of Rice Operating Company, R.T. Hicks Consultants, Ltd. is pleased to submit the Stage I Abatement Plan for the above-referenced site. Text for Rice Operating Company's proposed public notice is attached to this letter. CD copies of this email follow via FedEx. If you have any questions or concerns, please do not hesitate to contact us.

Sincerely,

R.T. Hicks Consultants, Ltd.



Katie Lee
Staff Scientist

Copy: Hobbs NMOCD office; Rice Operating Company;
R.T. Hicks Consultants Midland office

NOTICE OF PUBLICATION

**State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division**

Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following Stage 1 Abatement Plan Proposal has been submitted to the Director of the Oil Conservation Division, 1220 S. St. Francis Dr., Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

Rice Operating Company, Carolyn Doran Haynes, Operations Engineer, Telephone (505) 393-9174, 122 West Taylor, Hobbs, New Mexico 88240, has submitted a Stage 1 Abatement Plan Revision Proposal for the Pipeline Junction EME N-5, located in Section 5, Township 20 South, Range 37 East, Lea County, approximately 3 miles southwest of Monument, NM. To access the site, proceed south on Highway 322, approximately 2.75 miles. Turn right onto Caliche Lease Road and continue west 1 mile. Turn right and proceed north 0.5 miles, turn left and continue west 0.2 miles, turn right and proceed north 0.5 miles, turn right and continue northeast 0.2 miles to the site. Rice Operating Company operates a saltwater disposal pipeline at the site. Soil impacts at the site include chlorides and TDS. Groundwater samples exhibit elevated chloride concentrations. The Stage 1 Abatement Plan Proposal presents site soil and groundwater investigation activities and planned remediation.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The Stage 1 Abatement Plan Revision Proposal may be viewed at the above address or at the Oil Conservation Division District Office, 1625 N. French Drive, Hobbs, New Mexico 88240, Telephone (505) 393-6161 between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed Stage 1 Abatement Plan, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which written comments may be submitted to him.



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor

May 05, 2005

Joanna Prukop
Cabinet Secretary
Mark Fesmire
Director
Oil Conservation Division

Carolyn Doran Haynes
Rice Operating Company
122 West Taylor
Hobbs, New Mexico 88240

Re: Sites with confirmed Groundwater Contamination

Dear Ms. Haynes:

Pursuant to the New Mexico Oil Conservation Division rule 19.15.1.19 (Rule 19) Prevention and Abatement of Water Pollution requires all responsible persons who are abating water pollution in excess of the standards shall do so pursuant to an abatement plan approved by the director.

Therefore, Rice Operating Company is hereby required to submit individual abatement plans for OCD approval by July 15, 2005 for each of the following sites:

EME Sites:

H-13	UL	H	Sec 13, T20s, R36E	1R0429
M-9	UL	M	Sec 9, T20s, R37E	1R0331
P-6	UL	P	Sec 6, T20s, R37E	1R0422
Jct. N-5	UL	N	Sec 5, T20S, R37E	1R0427-90
Jct. M-16-1	UL	M	Sec 16, T20S, R37E	1R0427-93
Jct. K-33-1	UL	K	Sec 33, T19S, R37E	1R0427-92
Jct. A-20	UL	A	Sec 20, T20S, R37E	1R0427-89
Jct. K-6	UL	K	Sec 6, T20S, R37E	1R0427-88
Marathon Barber EOL	UL	E	Sec 5, T20S, R37E	1R0427-91
jct. D-1 leak	UL	D	Sec. 1, T20S, R36E	not assigned

BD Sites:

Zachary Hinton EOL	UL	O	Sec 12, T22S, R37E	1R0426-36
Jct. J-26	UL	J	Sec 26, T21S, R37E	1R0426-40
Jct. F-17	UL	F	Sec 17, T21S, R37E	1R0426-33
Jct. I-27	UL	I	Sec 27, T21S, R37E	1R0426-35
Jct. N-29	UL	N	Sec 29, T21S, R37E	1R0426-37
jct. E-3	UL	E	Sec 3, T22S, R37E	1R0426-53

Justis Sites:

jct. L-1	UL	L	Sec 1, T25S, R37E	1R0423-0
SWD H-2	UL	H	Sec 2, T26s, R37E	1R0423-01

Hobbs Sites:

Jct. F-29-1A	UL	F	Sec 29, T18S, R38E	not assigned
I-29 Vent	UL	I	Sec 29, T18S, R38E	not assigned

After OCD receives the plans each site will be assigned a new Abatement Plan number (AP#) for tracking purposes. If you have any questions please do not hesitate to contact me at 505-476-3493 or E-mail DJSanchez@state.nm.us; or contact Wayne Price of my staff at 505-476-3487 or e-mail WPRICE@state.nm.us.

Sincerely;



Daniel Sanchez
Enforcement and Compliance Manager
DS/wp

Cc: OCD Hobbs office

Price, Wayne

From: Price, Wayne
Sent: Wednesday, December 08, 2004 10:22 AM
To: Carolyn Doran Haynes (E-mail)
Cc: Kristin Farris Pope (E-mail); Sheeley, Paul; Johnson, Larry
Subject: Groundwater Investigation and Remediation Plans Required for OCD approval by March 15, 2005

Dear Ms. Haynes:

Please provide for OCD approval by March 15, 2005 groundwater investigation and remediation plans for the following sites:

EME M-16-1 OCD Case # 1R0427-93
EME K-33-1 OCD Case # 1R0427-92
EME E-5 OCD Case # 1R0427-91
EME N-5 OCD Case # 1R0427-90
EME A-20 OCD Case # 1R0427-89
EME K-6 OCD Case # 1R0427-88
BD-17 OCD Case# 1R0426-14

The plans shall include the following at a minimum.

1. Installation of a minimum of two additional monitor wells to properly delineate and define the groundwater conditions on and off the site.
2. A site sampling plan for constituents of concern.
3. The plan shall also include remediation techniques to reduce any vadose contamination that has not already been addressed, and groundwater contamination on and off the site.
4. An area map marking the approximate location and with directions on how to get to the site.
5. A site plot plan showing all significant features.
6. Photos of the site, including any photos available during the original work performed at the site.
7. A summary of all work performed and findings as of to date.

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

R. T. HICKS CONSULTANTS, LTD.

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

December 8, 2004

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

RECEIVED

DEC 13 2004

OIL CONSERVATION
DIVISION

RE: ~~M-5 Redwood Tanks, Section 5, T20S, R37E, Unit M, case number 1R0426-36~~

Dear Wayne:

In your December 3, 2004 email to Rice Operating Company (attached) you asked for the following submissions:

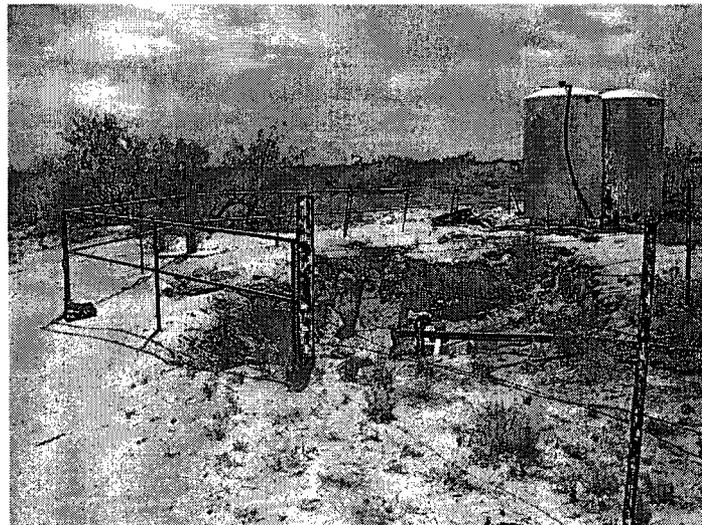
1. Photos of the site before, during and after excavation.
2. Photos of the liner and backfill.
3. A plat showing location of all monitor wells and a chloride/TDS chronologic summary table for these wells.
4. A copy of the NMOCD approved work plan (July 02, 2003) that R.T. Hicks is working under.
5. A copy of the Hicks January 30, 2004 final corrective action plan.

I attach a CD that contains all of the requested information.

In the CD folder named "site photos" you will find digital images of the site after excavation of the box associated with the Zachary Hinton End of Line (EOL) site. This site was excavated in 2001, when the Junction Box Plan was being written by ROC and under review by NMOCD. At this time, ROC was not creating a photographic record of their efforts. Therefore, no images exist that show the site before excavation.

Because the site remains open pending NMOCD approval of the Corrective Action Plan, ~~there is no liner and backfill at this time.~~ The Corrective Action Plan does not call for a liner at this site.

Because the site is so small, we elected to show the location of the monitoring well relative to the former EOL box with Figure 7 of the Corrective Action Plan. Figure 7 of the CAP is reproduced herein.



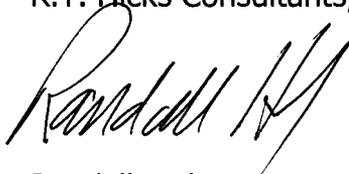
Note the red monitor well protection box with the concrete pad in the left center of the image – that is the monitoring well discussed in the CAP. The former EOL box excavation is in the center of the photograph. No other monitoring wells exist at this site. The monitoring well lies to the south-southeast of the former EOL, directly down gradient of ground water flow. The image on the CD titled "Northwest ZH 12.8.04" shows that the site remains relatively unchanged since Figure 7 of our CAP. The Corrective Action Plan, as submitted to NMOCD via email on 1/30/2004 (from Katie Lee of R.T. Hicks Consultants to Wayne Price), is on the CD in the zip-file folder titled "ZH_CAP".

In the CAP, Figure 1 provides the graphical display of the chemical data for the monitoring well to the end of 2003. Table 1 of the CAP presents these same data in tabular format.

We included the July 2, 2003 workplan in the CAP as Appendix A. NMOCD approval of the workplan is attached to this letter.

We are using the Zachary Hinton CAP as a template for other sites where slow leakage of produced water over time has created potential impacts to ground water. Examples of such sites are Vacuum G-35 and the various sites associated with the Hobbs Salt Water Disposal System abandonment. We are happy to provide submission of R.T. Hicks Consultants deliverables (on CD) via US Mail to NMOCD as well as via E-mail per your request and we look forward to your review the Zachary Hinton CAP and any guidance you could give to allow us to improve future submissions. Thanks for your input in advance.

Sincerely,
R.T. Hicks Consultants, Ltd.

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

Randall Hicks
Principal