426-10 7 1R -

GENERAL CORRESPONDENCE

YEAR(S): 2007

Page 1 of 2



122 West Taylor • Hobbs, NM 88240 Phone: (505) 393-9174 • Fax: (505) 397-1471

CERTIFIED MAIL RETURN RECEIPT NO. 7005 1820 0001 6804 4936

February 25, 2008

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

RE: NOTIFICATION OF GROUNDWATER IMPACT BD jct. P-26-2, #1R0426-107 Unit P, Sec. 26, T21S, R37E

Mr. Price:

Rice Operating Company (ROC) notifies the Director of the New Mexico Oil Conservation Division (OCD), Environmental Bureau of groundwater impact at the above-referenced site in accordance with NM Rule 116. The remediation of this site may be subject to NM Rule 19 procedures.

The following work was performed in accordance with the OCD-approved (verbal 7/18/2007) Investigation and Characterization Plan (ICP) submitted by the consulting company, Trident Environmental (Trident), to investigate potential groundwater concerns at this junction box site near Eunice. A soil boring for vertical delineation of chloride and a 2-inch monitoring well were installed on October 30, 2007 under the supervision of Gilbert Van Deventer of Trident. Groundwater was encountered at approximately 47 feet. The well was developed and sampled pursuant to OCD guidelines by Arc Environmental (Arc) of Lovington. Laboratory analyses of two sampling events confirm the Water Quality Control Commission standards for chloride and Total Dissolved Solids are exceeded at the monitoring well. Arc will continue to sample the well on a quarterly basis. Trident will be evaluating this groundwater data for the submission of a Corrective Action Plan. ROC is the service provider (agent) for the BD Salt Water Disposal System and has no ownership of any portion of the pipelines, wells, or facilities. The BD System is owned by a consortium of oil producers, System Partners, who provide all operating capital on a percentage ownership/usage basis. Environmental remediation projects of this magnitude require System Partner AFE approval and work begins as funds are received.

Please accept this notification for the above-referenced site. Should you have any questions or concerns regarding this site, please do not hesitate to contact me.

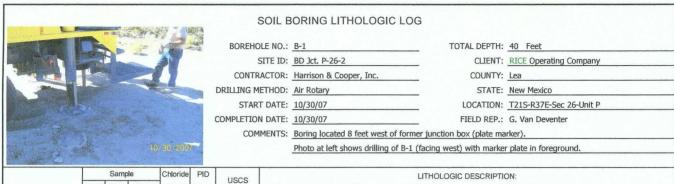
RICE OPERATING COMPANY

Knistin Famis Pope

Kristin Farris Pope Project Scientist

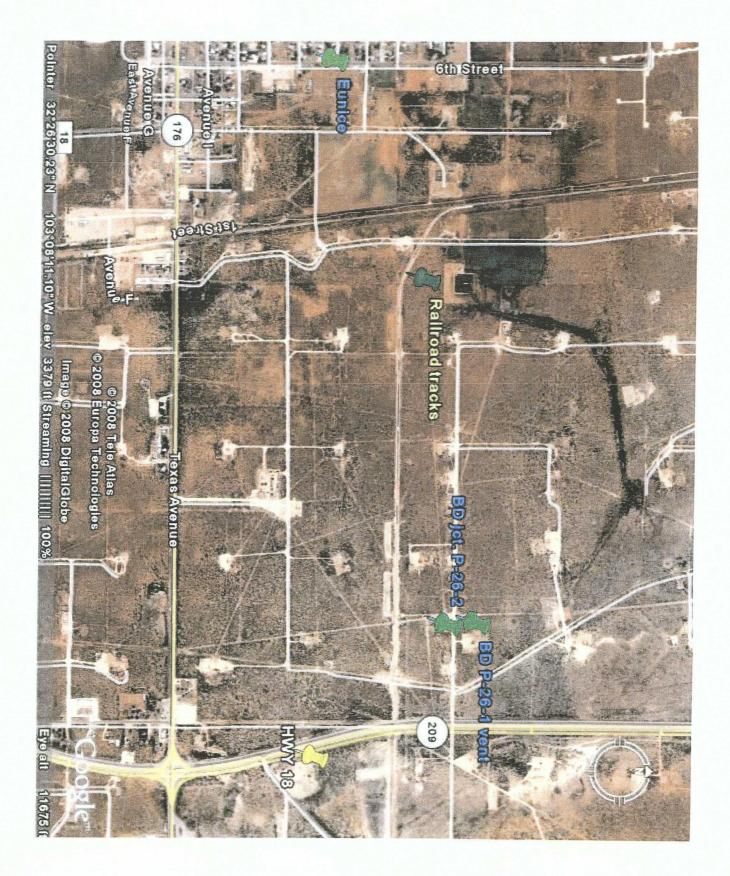
enclosures: 2 water analyses, soil boring log, well log, 2 maps

cc: SC, Trident, file, Mr. Chris Williams NMOCD, District 1 Office 1625 N. French Drive Hobbs, NM 88240



		Sam	1	Chloride	PID	USCS	LITHOLOGIC DESCRIPTION:
	Depth	Time	Туре	(ppm)	(ppm)		LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
			Surface			BF	Compacted backfill material consisting of fine-grained silty sand with calcium carbonate in matrix, pale yellowish
	5						brown (10YR 6/2), loose, unconsolidated, dry.
						CL	Compacted clay layer, dusky red (5R 3/4).
	10	1405	Split Spoon	209	0	BF	Compacted backfill material consisting of fine-grained silty sand with calcium carbonate in matrix, pale yellowish brown (10YR 6/2), loose, unconsolidated, dry.
and the second			Spoon				Fine-grained sand with calcium carbonate in matrix, pale yellowish brown (10YR 6/2), unconsolidated, dry.
	15						
D		1408	Split Spoon	294	4		Fine-grained sand with calcium carbonate in matrix, pale yellowish brown (10YR 6/2), unconsolidated, dry.
ole Plug	20					SW/CAL	
Bentonite Hole		1422	Split Spoon	2658	0		Fine-grained sand, gravish orange (5YR 7/4) with some very pale orange (10YR 8/2) calcium carbonate in matrix, moderately hard. Sand grains are medium-sorted, subrounded, unconsolidated, dry.
3/8	25						
- and the second		1435	Split	5025	0		Very fine-grained sand with calcium carbonate in matrix and intermittent hard (indurated) caliche, very pale orange (10YR 8/2). Sand grains are medium-sorted, subrounded, unconsolidated, dry. Sample submitted for laboratory
			Spoon				analysis with results as follows: Chloride = 4670 mg/kg.
	30						
	- 30	1445	Split	2555	0		Very fine-grained sand with calcium carbonate in matrix and intermittent hard (indurated) caliche, very pale orange
			Spoon				(10YR 8/2). Sand grains are medium-sorted, subrounded, unconsolidated, dry.
						SM/CAL	
	35	4445	0.0				Very fine-grained sand with calcium carbonate in matrix and intermittent hard (indurated) caliche, very pale orange
	a da ante ser da de sel 10 fais	1449	Split Spoon	2309	0		(10YR 8/2). Sand grains are medium-sorted, subrounded, unconsolidated, dry.
			opoun				
Sec. 1	40	1505	Cuttings	2100			Very fine and fine-grained sand with calcium carbonate in matrix and intermittent hard (indurated) caliche, pale yellowish brown (10YR 6/2). Sand grains are medium-sorted, subrounded, unconsolidated, dry.
← 5" →							Bottom of boring at 40 feet below ground surface.
	45						
	50						

			Lan	NZ JAX		T	мо	NITORING W	ZELL NO.: MW-1 TOTAL DEPTH: 56 Feet
	-	No.	St.		Lab			SITE	E NAME: BD Jct. P-26-2 CLIENT: RICE Operating Company
d'ante		Los I.		24	$\overline{\mathbf{N}}$			CONTR	ACTOR: Harrison & Cooper, Inc. COUNTY: Lea
			-		AN AL			DRILLING M	ETHOD: Air Rotary STATE: New Mexico
	2	in the	-		Carlos Carlos			STAR	T DATE: 10/30/07 LOCATION: T21S-R37E-Sec 26 - Unit P
			2.	A.			C	COMPLETIO	N DATE: 10/30/07 FIELD REP.: G. Van Deventer
- Company		AND AND		-	24			COM	MENTS: Located approximately 15 feet southeast of former junction box (plate marker).
1	5.1	N.				30/2007			Photo at left shows MW-1 drilling activities (facing southeast). Orange pin flagging identifies active
F	(a. 56 362	R-		Samp	lo	Chloride	PID	.	brine water lines and marker plate is shown in foreground.
			Depth	T	1	(ppm)	(ppm)	USCS	LITHOLOGIC DESCRIPTION: LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
		ΙΓ			Surface				Fine-grained dune sand, light brown (5YR 6/4), well sorted, well-rounded, unconsolidated, dry.
								sw	
Cement		Cement						000	
e Ce		Ce	5	ļ	Calit				Very fine grained and with calcium comparate in matrix year rate arrange (40VP 8/2), unconsolidate
				1540	Split Spoon	516	0		Very fine-grained sand with calcium carbonate in matrix, very pale orange (10YR 8/2), unconsolidate dry.
								SM/CAL	
			10	1542					
			10	10.12	Split	359	0		Fine-and medium-grained sand, pale yellowish brown (10YR 6/2) and grayish orange (10YR 7/4),
	ing		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		Spoon				moderately well-sorted, subrounded, unconsolidated, dry.
	Cas								
Bnild	Blank	Plug	15	ļ					
Hole	VC I	Hole		1543	Split Spoon	564	0		Fine-and medium-grained sand, pale yellowish brown (10YR 6/2) and grayish orange (10YR 7/4), moderately well-sorted, subrounded, unconsolidated, dry. Sample submitted for laboratory analysis
UITE	40 F	nite I						sw	results as follows: Chloride \approx 162 mg/kg.
sento	Sched 40 PVC Blank Casing	Bentonite Hole Plug	20						
3/8 Bentonite Hole Plug	2" S(3/8 E	20	1545	Split	457	0		Fine-and medium-grained sand, pale yellowish brown (10YR 6/2) and grayish orange (10YR 7/4),
				1343	Spoon				moderately well-sorted, subrounded, unconsolidated, dry.
			25	1602	Cuttings	344			Fine and medium-grained sand with slight calcium carbonate in matrix, light brown (5YR 6/4),
					1.000				moderately well-sorted, subrounded, dry.
			30	1604	Cuttings	285		SW/CAL	Fine and medium-grained sand with slight calcium carbonate in matrix, light brown (5YR 6/4),
			30	1004	Cullings	205			moderately well-sorted, subrounded, dry.
			35	1606	Cuttings	285			Fine-grained sand with calcium carbonate in matrix and intermittent hard (indurated) caliche, very pa
-									orange (10YR 8/2) and grayish orange (10YR 7/4), moderately well-sorted, subrounded, dry.
								SM/CAL	
Sand Pack	S	Pack	40	1608	Cuttings	353			Fine-grained sand with calcium carbonate in matrix and intermittent hard (indurated) caliche, very pa
nue	Slot	Sand			Janigo				orange (10YR 8/2) and grayish orange (10YR 7/4), moderately well-sorted, subrounded, dry.
SIIICE S	010"	Silica S							
N OII	Screen with 0.010" Slots	y Sil							·
Diauy	in wi	Brady	45	1610	Cuttings	979			Fine-and medium-grained sand, light brown (5YR 6/4), moderately well-sorted, subrounded, slightly moist.
20/40	Scree	20/40 E				-			
2C	ter S	20							
	Diameter		50	1615	Cuttings	470			Fine-and medium-grained sand, light brown (5YR 6/4), moderately well-sorted, subrounded, slightly
	2" Di								moist.
								SW	
f			55	1620	Cuttings	605	1		Fine-and medium-grained sand, pale yellowish brown (10YR 6/2), well-sorted, sub to well-rounded, moist.
	5" -	->							
			60	1625	Cuttings	41			Fine-and med-grained sand, pale yellowish brown (10YR 6/2), well-sorted, sub to well-rounded, mois
									Bottom of boring at 60 ft below ground surface.







ANALYTICAL RESULTS FOR RICE OPERATING COMPANY ATTN: KRISTIN FARRIS-POPE **122 W. TAYLOR STREET** HOBBS, NM 88240 FAX TO: (575) 397-1471

Receiving Date: 01/15/08 Reporting Date: 01/22/08 Project Number: NOT GIVEN Project Name: BD P-26-2 Project Location: T21S R37E SEC26 P~LEA COUNTY, NM

Sampling Date: 01/14/08 Sample Type: WATER Sample Condition: COOL & INTACT Sample Received By: ML Analyzed By: HM/KS

	Na	Са	Mg	к	Conductivity	T-Alkalinity
LAB NUMBER SAMPLE ID	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(uS/cm)	(mgCaCO ₃ /L)
ANALYSIS DATE:	01/21/08	01/21/08	01/21/08	01/21/08	01/16/08	01/16/08
H14087-1 MONITOR WELL #1	3,245	163	113	69.5	16,110	344
Quality Control	NR	49.2	52.4	2.93	1,433	NR
True Value QC	NR	50.0	50.0	3.00	1,413	NR
% Recovery	NR	98.5	105	97.8	101	NR
Relative Percent Difference	NR	< 0.1	3.0	8.5	1.4	NR
METHODS:	SM3	3500-Ca-D	3500-Mg E	8049	120.1	310.1
	СГ	SO4	CO3	HCO3	pН	TDS

	CI	304	003	пс0 ₃	рп	105
	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(s.u.)	(mg/L)
ANALYSIS DATE:	01/16/08	01/17/08	01/16/08	01/16/08	01/16/08	01/18/08
H14087-1 MONITOR WELL #1	5,100	469	0	420	7.33	9,453
Quality Control	500	26.8	NR	1000	7.04	NR
True Value QC	500	25.0	NR	1000	7.00	NR
% Recovery	100	107	NR	100	100	NR
Relative Percent Difference	2.0	2.0	NR	< 0.1	0.3	NR
METHODS:	SM4500-CI-B	375.4	310.1	310.1	150.1	160.1

ista Aprilie

01/22/08 Date



PLEASE NOTE: Llability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. The House interval is a consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR RICE OPERATING CO. ATTN: KRISTIN FARRIS-POPE 122 W. TAYLOR ST. HOBBS, NM 88240 FAX TO: (575) 397-1471

Receiving Date: 01/15/08 Reporting Date: 01/16/08 Project Number: NOT GIVEN Project Name: BD P-26-2 Project Location: T21S-R37E-SEC26 P ~ LEA CO., NM Sampling Date: 01/14/08 Sample Type: WATER Sample Condition: COOL & INTACT Sample Received By: ML Analyzed By: AB

				ETHYL	TOTAL
		BENZENE	TOLUENE	BENZENE	XYLENES
LAB NUMBER	SAMPLE ID	(mg/L)	(mg/L)	(mg/L)	(mg/L)
				• ······	·····
ANALYSIS DA	TE	01/15/08	01/15/08	01/15/08	01/15/08
H14087-1	MONITOR WELL #1	<0.001	<0.001	<0.001	<0.003
Quality Control		0.097	0.087	0.093	0.270
True Value QC		0.100	0.100	0.100	0.300
% Recovery		96.5	87.4	92.9	89.9
Relative Percer	nt Difference	6.2	5.8	5.2	5.0

METHOD: EPA SW-846 8021B

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims line the damage of the second any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, ioss of use, or ioss of profils incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.

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	Sampler	Delivered By:	Relinquished by	RozapheSuppsfor	Relinquistnet by:									1-14/087-1	LAB #		T21S R37E	Project #:	(575) 393-9174	122 W Taylor S Phone #:	Address: (S	in Fa	Project Manager:	Company Name: RICE Operating	Tel (505) 393-2326 Fax (505) 393-2476	101 East Martand - Hobbs, Mexico 88240	
	UPS - Bus - Other:	(Circle One)	Z Date: Time: /	1-15-2008			J							Monitor Well #1	FIELD CODE		E Sec26 P ∼ Lea County New Mexico	Project Name: BD P-26-2		122 W Taylor Street ~ Hobbs, New Mexico 88240	(Street, City, Zip)	ris-Pope, Project Scientist		ating Company		-Hobbs, New Cordinal	
		Sample	Recei		Recei	Γ								G	(G)rab or (C)omp		lexico		(575)	Eav #					114	3	ļ
	Yes No	Sample Condition	Received By:	wit	Received by:									3	# CONTAINERS	A i	$\left(\right)$) 397-1471	(575) 393-9174		122 W Taylor Street ~ Hobbs, New Mexico 88240		RICE O		1 Tohorotorioc	
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1									1]]	ļ	Chlorides												11-



ANALYTICAL RESULTS FOR RICE OPERATING COMPANY ATTN: KRISTIN FARRIS-POPE 122 W. TAYLOR DTREET HOBBS, NM 88240 FAX TO: (575) 397-1471

Receiving Date: 11/15/07 Reporting Date: 11/16/07 Project Number: NOT GIVEN Project Name: BD P-26-2 Project Location: T22S R37E SEC26 P ~ LEA COUNTY, NM Sampling Date: 11/12/07 Sample Type: GROUNDWATER Sample Condition: COOL & INTACT Sample Received By: SB Analyzed By: BC

LAB NO. SAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE	11/15/07	11/15/07	11/15/07	11/15/07
H13716-1 MONITOR WELL #1	<0.002	<0.002	<0.002	<0.006
Quality Control	0.101	0.096	0.099	0.298
True Value QC	0.100	0.100	0.100	0.300
% Recovery	101	95.9	98.6	99.2
Relative Percent Difference	8.6	2.9	2.3	2.4

METHOD: EPA SW-846 8260

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PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including these for pedigence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In adverte the applicable is a substantiation of the applicable service of substantiation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



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ANALYTICAL RESULTS FOR RICE OPERATING COMPANY ATTN: KRISTIN FARRIS-POPE 122 W. TAYLOR STREET HOBBS, NM 88240 FAX TO: (575) 397-1471

Receiving Date: 11/15/07 Reporting Date: 11/26/07 Project Number: NOT GIVEN Project Name: BD P-26-2 Project Location: T22S R37E SEC26 P~LEA COUNTY, NM Sampling Date: 11/12/07 Sample Type: WATER Sample Condition: COOL & INTACT Sample Received By: SB Analyzed By: HM/KS

120.1

310.1

		Na	Са	Mg	К	Conductivity	T-Alkalinity
LAB NUMBE	R SAMPLE ID	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(<i>u</i> S/cm)	(mgCaCO ₃ /L)
ANALYSIS D	DATE:	11/21/07	11/21/07	11/21/07	11/21/07	11/20/07	11/20/07
H13716-1	MONITOR WELL #1	2,481	459	266	64.9	15,150	228
Quality Conti	rol	NR	49.2	51.6	2.95	1,409	NR
True Value C	QC	NR	50.0	50.0	3.00	1,413	NR
% Recovery		NR	98.5	103	98.3	99.7	NR
Relative Perce	cent Difference	NR	< 0.1	1.5	5.0	0.4	NR

SM3500-Ca-D 3500-Mg E

		CI	SO4	CO3	HCO₃	pН	TDS
		(mg/L)	(mg/L)	(mg/L)	(mg/L)	(s.u.)	(mg/L)
ANALYSIS D	DATE:	11/20/07	11/21/07	11/20/07	11/20/07	11/20/07	11/19/07
H13716-1	MONITOR WELL #1	5,000	430	0	278	7.34	9,415
Quality Contr	ol	500	22.8	NR	988	7.06	NR
True Value Q	IC	500	25.0	NR	1000	7.00	NR
% Recovery		100	91.1	NR	98.8	101	NR
Relative Perc	ent Difference	< 0.1	6.3	NR	1.2	0.1	NR
METHODS:		SM4500-CI-B	375.4	310.1	310.1	150.1	160.1

Justa Inploto

METHODS:

11/26/07 Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In the even walk of the service incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.

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ristin Farris-Pope, Project Scientist	oject Scientist	12	122 W Taylor Street ~ Hob	aylor S	treet ~	Hobbs,	bs, New Mexico 88240	lexico {	38240																	
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