1R-426-117

WORKPLANS

DATE:

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

Texerra

RECEIVED

2008 JUN 6 PM 1 35

June 3rd, 2008

Mr. Edward Hansen

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

RE: Investigation and Characterization Plan Rice Operating Company – EME SWD System BD Oxy Owen "A" and BD P-35-1 Jct ノ R コンム // ノ

Sent via E-mail & U.S. Certified Mail w/ Return Receipt 7007 0710 0003 0305 3927

Dear Mr. Hansen:

RICE Operating Company (ROC) has retained Texerra to address potential environmental concerns at the <u>two</u> above-referenced sites located in the BD SWD system. ROC is the service provider (agent) for the EME 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. Environmental projects of this magnitude require System Partner AFE approval, and work begins as funds are received. In general, project funding is not forthcoming until NMOCD approves the work plan. Therefore, your timely review of this submission would be greatly appreciated.

For all such environmental projects, ROC will choose a path forward that:

- protects public health,
- provides the greatest net environmental benefit,
- complies with NMOCD Rules, and
- is supported by good science.

Each site shall generally have three submissions, as described below:

- 1. This <u>Investigation and Characterization Plan</u> (ICP) is proposed for data gathering and site characterization and assessment.
- 2. Upon evaluating the data and results from the ICP, a recommended remedy will be submitted in a Corrective Action Plan (CAP) if this is warranted.
- 3. Finally, after implementing the remedy, a <u>Closure Report</u> with final documentation will be submitted.

This ICP is intended to encompass two nearby sites within the BD SWD system, where the proposed scopes of work are tailored to the respective projects.

BD Oxy Owen "A"

Background and Previous Work

The site is located approximately one mile east/southeast of Eunice, New Mexico (Figure 1). The topography is gently sloping toward the southeast. Soils on the site are mapped in the Lea County Soil Survey as belonging to the Berino-Cacique association, which are characterized as nearly level and gently sloping, sandy soils that are deep and moderately deep to soft or indurated caliche. NM OSE records indicate that groundwater is likely to be encountered at a depth of 50+/- feet in unconsolidated Tertiary alluvium of the Ogallala Formation.

ROC removed three junction boxes from this site, all located within close proximity of each other, in March of 2006 as part of its facility maintenance and upgrade program. (See Figure 2: Rice Junction Box Disclosure Report). The wood junction boxes were removed and soils were sampled using a backhoe, creating a 45 by 35 by 12 ft deep excavation. The excavation bottom and sidewalls were sampled for chlorides and petroleum hydrocarbons, and the excavated soil was then backfilled to ground level.

Significant concentrations (approx. 4,000 +/- ppm) of total hydrocarbons were encountered in the excavated soil with a lower concentration found (394 ppm) at 12 ft below ground surface (bgs). Chloride concentrations were 818 ppm at the bottom of the excavation. <u>Petroleum hydrocarbons</u> and <u>chlorides</u> thus represent the <u>constituents of concern</u>. The surface (ecological) impact of this release was relatively small.

ROC proposes additional investigative work, as outlined below, to more definitively evaluate the extent of residual petroleum hydrocarbons and chlorides, and to then evaluate the potential for groundwater degradation. Yet, it should be noted that the source of this impact is historical. There is no longer a threat of continued, compounded impact at this site as the former junction box has been removed and a clay barrier installed to impeded downward migration of potential contaminants.

Proposed Work Elements

- 1. Summarize information and data collected by ROC to date.
- 2. Summarize additional, publicly available regional and local hydrological information.
- Conduct vertical and lateral delineation of soil <u>chlorides</u> and <u>petroleum hydrocarbons</u>. If warranted, install one or more monitor wells to provide a direct measurement of potential groundwater impact. [All monitoring wells will be constructed per NM Dept. Environment standards].
- 4. Evaluate the risk of groundwater impact in light of the information obtained.

If the evaluation demonstrates that residual constituents pose no threat to ground water quality, then only a surface restoration plan will be proposed to OCD. If this work indicates that there is a present or future risk of impacting groundwater quality from past operations at this location, then a corrective action plan (CAP) will be developed and proposed to OCD.

Texerra

2





Texerra

3

		RICE OPERATING NINCTION BOX DISC E	S COMPANY OSURE: REPORT		
		BOX LOCA	.4636.		
SWD SYSTEM B	ONCTION UNIT		RANNE CO.	VTV SOX DWENHOUS	TEFT
j Ale si	ny Carolin Ny Garang Doby 1990 - Ny Dobadina g	35 1 212	1 37 <u>5</u> 17	a <u>Length</u> Wielli al'hosta: e is in:	sies
EANILY L. E.M.	STATE	TER AN JUWNER	Geraldine Ostoan	OTHER	
oeph th Groundw	aka et	ter MMOCT	STE ABSTRAME	NT RAUKING SCORE	20 '
Lote Starker	<u>3730/2008</u>	Date Completedt	6// <u>2/2008</u> \\	MOCO Warress	<u>ac</u>
551 availabilit	724 cuti	ands Excession Le	ngih <u>47</u>	Mallh Dec h	121w
Sor Dispeste	<u> </u>	, yeas - Ofeile Facility			<u>n'a</u>
FINAL ANALY II	CAL RESULTS	Sample Date	4/10/2000	Sample Depth	12.4
v-poord op notisatte san Vidovais – (PD) av Vidovais – (PD) av	unais of bottom and ag chloride amerato 10 teshi gipagood, 19	4-point composite sample ly test manifs, completed is separation MADCD by:	of iorcavation wiusing su loet tes		TESTS
. Semple	P 2 -	ana Hydrocention (03-005)	C Horida	SAMELE DEPTH	C-LORIE
Lotation	sper-	₩0 ³ 3	māgai	CC4TICIN	கல் க
A WALL COMP	() i 	1870	317	-1-wall comp tva	
NOT OF COMP		2720	1 318	Lotomeann 32	
BACKIN		- 190 	(25	backtif printip 1/a	902
x 47 × 35 × 12 fielded extern a loge of 271 have received in the other than 201 in second that a loge that 201 in second seco	vation that when my access or 2006 your their a flat na tenne extension of the on tests lifed when the f	d the fourier terms and at the 3 t 10. The least notified. I P.D. Feld at an is the protocy of algebra (1900)	nievs – Chistide o ere groonings also y ebied CLS (PH Alementano	rtex ons at the Browghow the ex- a knee tange of conversions a acceloise way not met - the a- n - An they former give viza play	covation from 12-t tartiste 2
verne klanded og øte om til cuttaan af Neiseine te mate t	te insten faratum en	e economial Astroide etters. Al	ene on enningeners OCC vas walf et el i	occutta y a ndwater moder a li	va sle cr
were blanded on who and th cumpan of this site to many t cumpan of this site to many to cumpan of the set	the Groat on For a cura an	energinental considerer ander et energinental considerer (etc.) Al diminated with the applications	allog var nogi et el i allog var nogi et el i	settenta y a nadaviter maast ar li	va się cr
vers Mandad an yet one th current of this sho to many C. 201305 All street boxes	I - forsten for deute Au Innie arca Part annie - ADDI ¹	International 24264 - Providence of the second seco	V IS <u>HIGH</u> PRK	ottalis gandetia moot a li	:+17/5 HRC 1/4 sle cr
vers Mandad an else ans th current of this site to man 1 C. 201035. Al times boxes "There are serve version well	ער אינג אינג אינג אינג אינג אינג אינג אינג	nonnentil Seniti- Heren Inninatica et la Theory the Cost FIONAL EVALUATION no. here-et all acc facility	N IS <u>HIGH</u> PRK	ottonilia gangdweiter moost ar ii DRITY # Otty weiter # Jao moost, P O (#H sectoring)	initian grape
vers Mandal on yet on th current of this site form and current of this site form and current of this site form and current of this site of the current of this site of the current of the site of the site of the site of the current of the site of the site of the site of the current of the site of the site of the site of the current of the site of the site of the site of the current of the site of the site of the site of the current of the site of the site of the site of the site of the current of the site of the site of the site of the site of the current of the site of the site of the site of the site of the current of the site of the current of the site of the sit	Le facet en tor a tura an Le se a otto Poor, sue a ADDI a statue 1993 a ditor a	FIONAL EVALUATION	Cos definided deta ALCO assessified et Cose Hill ympian V IS <u>HIGH</u> PRK Almentee hered as a ereleates (1 ald	ottoffis grandweiter moost alli DRITY allity witer x, lao tobolt, PD (witer servering)	ante er da sie er a. chieden grepe
vere Mandadian ybe one th current of this site to more 1 C. 201035. All smoot books There are search only well . Hight THY C.	1 - Каз-цер (27 страна) 1 - улу с отса Разу, 30- 3 АДДД 2 - Убук 1993 - аб Пос - ССТРУ 1993 - 54E	INFORMATION ABOVE NECEMATION ABOVE NECEMATION ABOVE NECEMATION ABOVE NECEMATION ABOVE NECEMATION ABOVE NECEMATION ABOVE NECEMATION ABOVE	Alexandration Alexandratics NISHIGH PRK Alexandratics created and processing created and processing created and processing STRUE AND CO DISELING	Setsell's grandweller moost at if DRITY <u>I Oty</u> setser <u>K</u> has toold, P D (will yet sets right WPLETE 10 (Hin 1787 G)	<u>антарт</u> ика <u>An ale</u> ст а. сМайан диере Т. Ма
vers Mandallon vist and the current of this size for mand the angle of the size for mand the size of the size of the the size of the size of the the size of the size of the the size of t	Le faret en ter a cuia au Le re a orca Passe au ABDI 2 e vera E RT E y 1 E <u>cuid Witcher</u>	INTERNATIONAL CONTRACTOR	VISHIMATORIA STODIAN HIGH PRIC VISHIGH PRODUCT COMPANY STORES AND COMPANY STORES AND CO COMPANY STORES AND CO COMPANY STORES AND CO COMPANY STORES	Setterité grandweiter maaar an it SRITY nOth setter killas tablik, Piblikki ya teningt WPLETE (Q. 1400, 1787, Q) OWPANY	in the state of th
vere Mandadian yoo ana Mi cuntasa a' Mile iny te mana C. 201035 Al unrec boxa Tipere are taxes water and C. H., 20104 C. C. H., 20104 C. S. H., 20104 C.	1 - far-sten for а слож ни (- су с отса Разу, АDDI) 2 - у сък	Information of the applied of the second sec	Cos definition (Costa allo) as any first (Cost Cost and Standard Cost N IS <u>HIGH</u> PRIC N IS <u>HIGH</u> PRIC N IS <u>HIGH</u> PRIC Cost and Cost Cost (Cost (Cost) Cost (Cos	Setteritis grandweiter moost an it DRITY <u>n Otheraster</u> x loo moute, P D (with yeartering) WPLETE 100 (Min. 17/87.02) UMPANY <u>RIOT opp</u> roduce 5 21 (19/22/22) (19/22)	in sie op a. chladan grepe 7 Mar 8000er 2
Versi Mandadi an yés ans th curtosa a' this site to man J C. 201335. Al times boxes There are search of a set . His 21 TH CE SHIE SUPERMINEL SHIE SUPERMINEL SHIE SUPERMINEL SATE	Le farent en tor a tria an ADD1 2 outer 1000 - af this 2 outer 1000 - af this ERT FY 1-100 - 5-4E Cause Miryten E den Farent Algorithm	TIONAL EVALUATION INTERNATION ABOVE PROVIDENT ON ABOVE PROVIDENT OF ABOVE PROVIDENT P	<pre>Contraining Contraining C</pre>	Setteritis grandweiter moost all DRITY (1)(1) setter k han touts, P D (44) setterings WPLETE 10 (1)(1) 1787 (2) WPLETE 10 (1)(1) 1787 (2) COMPANY	in the second se

Figure 2 – Owen Oxy A Junction Box Disclosure Report

BD P-35-1 Jct

Background and Previous Work

The site is located approximately one mile east/southeast of Eunice, New Mexico (Figure 1). The topography is gently sloping toward the southeast. Soils on the site are mapped in the Lea County Soil Survey as belonging to the Berino-Cacique association, which are characterized as nearly level and gently sloping, sandy soils that are deep and moderately deep to soft or indurated caliche. NM OSE records indicate that groundwater is likely to be encountered at a depth of 50+/- feet in unconsolidated Tertiary alluvium of the Ogallala Formation.

ROC removed a wooden junction box at this location, replacing it with a new, water-tight junction box (located approx. 33 ft southwest of the original location) in May of 2006 as part of its facility maintenance and upgrade program. (See Figure 4: Rice Junction Box Disclosure Report). As the original wood junction box was removed soils were sampled using a backhoe, creating a 30 by 25 by 12 ft deep excavation. The excavated soils were blended and then backfilled into the excavation. The disturbed surface was then seeded with a native vegetation mix.

Low concentrations (30 ppm) of petroleum hydrocarbons (TPH) were encountered in the excavated soil. TPH concentrations were below detection (< 10.0 ppm) in the sidewalls and bottom of the excavation. Petroleum hydrocarbons were therefore ruled out as a potential constituent of concern. In contrast, chloride concentrations increased with depth to 2,185 ppm at 12 ft below ground surface. The surface (ecological) impact of this release was relatively small.

ROC proposes additional investigative work, as outlined below, to more definitively evaluate the extent of residual chlorides (the constituent of concern), and to then evaluate the potential for groundwater degradation. Yet, it should be noted that the source of this impact is historical. There is no longer a threat of continued, compounded impact at this site as the former junction box has been removed.

Proposed Work Elements

- 1. Summarize information and data collected by ROC to date.
- 2. Summarize additional, publicly available regional and local hydrological information.
- Conduct vertical and lateral delineation of soil <u>chlorides</u>. If warranted, install one or more monitor wells to provide a direct measurement of potential groundwater impact. [All monitoring wells will be constructed per NM Dept. Environment standards].
- Evaluate the risk of groundwater impact in light of the information obtained.

If the evaluation demonstrates that residual constituents pose no threat to ground water quality, then only a surface restoration plan will be proposed to OCD. If this work indicates that there is a present or future risk of impacting groundwater quality from past operations at this location, then a corrective action plan (CAP) will be developed and proposed to OCD.





			RICE OPERATIO	NC COMPANY									
			JUNGTICK BOX DISC	CLOSURE' REPO	r: -								
	<u></u>		BOX00	LATION									
	SWG SYSTEM U	arenar Tar	IT SECTION FORMA	FIL RABIE -	<u>009111 14.9920</u> (121911	V Ctr Vict	Licpin						
	RT.	a. P 55 - 1	25 228	39E 1	1127	ea 23 filocutawa							
	EAND YFU: BLY		FEELANCOWREE	Gerschine Gau	CH ATHER								
	Death a Stoarcy	otel 50		CD SITE ASSESS	MENT KANYIND S	SORE	<u>90</u>						
	Jere Rosce I	100242009	Date Completed	1-27/2006	KMOGE Witness	ΥΞ	S -						
	Suil Excareted	<u></u>	Augurus Excession	- 30 June - 30	%an <u>25</u>	1'4-41	12						
	Sci Disseved	- 2	orsen- Onsro Fata	ry na	onetion		2						
					na Miriyaa iya			· ·					
	FINAL ANALYTIC	CAL RESULT	5 Sample Cate	87772906	5ample (a	eptih	111 ()						
	b osert composite si	ampio or actions an	4 4-cort composite samp	• • • • • • • • • • • • • • • • • • •				-					
	vectories Fill and a	hissee abacatory b	sar usa dise contro Metri I yu	sing an approved	UI LUI	OCTICLE IS	.816						
	radokoktek ant	o rosting bordeonte	e terren in antro 1 de	Jennee.	DOCATION	DEPTI 6	60%						
	Sample.	HD (ht)dr	1811.0293.355	Chicade		: <u></u> ∠	397						
	Losason .	5.cm	$\alpha g \phi \phi$	արժեց		5	1'3						
	NWALL COMP	1.5	k10.0	960		5	277						
	EDITOR OTHER	4.3	+10.0	472	*660 ITH		345						
	SACATILE	21	et o	10.12	of foreign	3	199-0						
					incloa	5	1549						
						10	1 1 17						
	General Description of	FRecepter Action			i	<u> </u>	1953						
			715-1-90904 WARS 009909	0.32-3.5030.5			1520						
	user er ûn de jin dikerse	141 900 meneruperate		<u> </u>	۱	<u> </u>	2110						
		<u>ig situatenne er talen</u>	. entrema es, anes i na a 0	25 28 Y 12 N									
	- source and including end of	-shue - a a barle b	n kad kanpakanta etakte	evalez ankinde rezer	ensateris (aggri ese		4	•					
	e pola como ecome	стеку) на советски	nsamo gha ciù er prete se	аларыну ардар тактана	->>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>	en en en provi	• •	- 1 - E -					
	an and the second second	e active designation of	- and response to the last en	ens no sets o book	14110-44-344	1-J1 2[-4- 5							
	The dealerships of a	والإسراق والالارد الال	на артонула станования. На артонула станования на населения станования станования и программи и программи и прог	the statute laws	ner igs£ 100 - × s Hone	San di n a shinan di k		•					
	serence and the						Lan						
	and the second second second												
	the and the most of the second	i - Brith, with the risk.	4 ,2 '										
								•					
		ADD	HONAL EVALUATIK	onis <u>mgh</u> pi	RICRITY								
			and sources, proceeding of the addression of the second state of t										
		······		 melasarat ist 									
		······································		· measurat a	<u></u>								
				- ang aganag ag			······						
		-Eltritea, F	H WHORMANDS RECV	HIS I RUE AND G	JOMPLEDE CIE	- RESTORM	γ.	· · ·					
		-E1:6(160) 8	HINFORMATION RECV REPORT FOOD	HISTRAE AND C	SCMPL-SH (CTH	- RHST OF M	Y .	, , ,					
	herden of C	- H 1 H (1 H 0, 1 H	F MEDRYATION RHOV KHOW (FDCE)	HIS I KUB ANT (AND BELIER	SCIMPLE (F) C (F	- KHST OF M	γ	· ·					
	Here and the second sec	- H 1 H (1 H 0, 1 H	F MEMPARIAL RECV RAINING FORCES	HIS FRUE AND G	COMPLEXE (C. LE	- RHOT OF M	······································	· ·					
		-R1+(1+4) +	н онгончилов, енсу еонгон, носе с соста Сал		SCREE-) F COLF	- KHOL OF M	Y .						
	- 11 (1 12-27 27)) 	-R14(164) 8	нанания (ал. кном какал, наск солого <u>Се</u> С		жинн -) н (с. 1 н - 303 ж <u>х</u>	- внат СР м . <u>Э</u> ңизик, Са	Y 1-107						
	н-чексе - террикази	-Riberiban B	нанавия (бъл кном контор и населя контор (<u>Се</u> Д	resure a Fisitrue antio and ealier CASCON	аланы (с. 16 2003-01- <u>20</u>	- кнат он м . <u></u>	1-07 X						
		-Rifferina, H	наникалык кном консонтер сталаты <u>Кар</u> К	44345207)	астан - зн 1 ст. 1 н - стал на - <u>о</u> ст	- PHANA CA	γ γ ····						
•		- Kiter (I Hay) He S of any . 	н антания бал енсу конча, насел е село <u>ССС</u> е гон ос ССС	HISTRIE ANTO NO ELLES CASCON	annen - se i co se annen - an Hin Sar	- кнатор м _{Сел} енија 16 <u>27</u> Д	у 1904 Эрж						
	۲۲ (۲۰۰۰ ۵۵۲) ۲۰۰۰ - ۲۰۰۰ - ۲۰۰۰ ۲۰۰۰ - ۲۰۰۰ - ۲۰۰۰ - ۲۰۰۰ - ۲۰۰۰ ۲۰۰۰ - ۲۰۰۰	-Richerther (Posteray) status fac status fac	н анганада бак кногу канада бак кногу с наста с <u>Сед К.</u> р. _{Эт} с с с с с с с с с с с с с с с с с с с	HISTRIE AND NO BELIEF CASCON	аланы - тыйсты 1999 - тыйсты 1110 - Дал 1999 - тыңы	- кнол он м , <u>о</u> диник, ба 177 <u>2 - Д</u>	у 1904 Дара						
	на чала с на чила с ла та на ратон за ум ратон ут на ратон за ум на т	- Rither (Fa), Fa	н онгончи ток, енсу енгли, носк с соото с <u>Сед С</u> е 1 ₂₀ холит о с с с с	HISTRIE AND NO BELIEF CASCON	астаны стан 1303 ман <u>по</u> 1411 Дал 1412 городаны	- кнат он м . <u>П</u> иника . <u>П</u> иника 	and Baps						
	Friday Cu Friday Cu Sant Row And Sant Row An	-Eltertear e Sefagy - Sta Far - Sta Far - Sta Far	н онгончи сон, енсу конски, носк и с наски с <u>СС</u> С о тура о тура и witt be placed on a or	HISTRUZANIC NO ELLES BASCON MILLO	2004 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	- KH21 OF M - Merster, S.a. - <u>Merster, S.a.</u> - Merster, S.a.	1917 205						
· .	Friday Co State State Association State State State State This site is a '	Polocuosure.	н антона сол, енем конса россе с с сонто с <u>Дед Д</u> с Сум с учите с расседет и ра t will be placed on a pri	HIS TRUE AND CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR	2009 40 - 16 ° C 16 2009 40 - <u>200</u> 1110 Aat 110 Aat 110 Aat	- кнал он м . <u>М</u> иник ба 17 <u>72 - Д</u> ти considerat	1-14 2-25 Ion.						
• •	E-Howe U This she is a " This she is a "	Porthese Southese Descussions Discussions	н антончал (ок. енсу кончал, носел аласылал <u>Сед С</u> аласылал <u>Сед С</u> аласылал и witt be placed on a pri	HISTRUS ANTO NO BELIET CARSCON MAIL MAIL	астан - зн 100 гн 1000 ал - <u>100</u> 1110 - Дал 1110 - Дал 1110 - Сан	- кнат ор м 	1417 205 Kon.						
· .	En Ponte da Serie da	-RIH(IFA) F Swifney 	н анганаа (ок. енсу катар, носк с тактар, <u>Сед С</u> с тактар катар с тактар и witt be placed on a pri	resure a	1.22004 - 14 (C. 14 2.22004 - 424 - 2002 1.22004 - 424 - 2002 1.22004 - 2204 - 220 2.22004 - 2204 - 2204 - 220 2.22004 - 2204 - 2204 - 2204 2.22004 - 2204 - 2204 - 2204 - 2204 2.22004 - 2204 - 2204 - 2204 - 2204 - 2204 2.22004 - 2204 -	- кнат он м . <u>а</u> рения ба 	1-11- 205 Ion.						
	Friday (U Sano ya Jazarda) ang Jano ya Jazarda ang Ja	Definition Definition	н оннончи сон, енсу енгли, носк и енгли, <u>Сед С</u> енгли, <u>Сед С</u> и witt be placed on a pri	HISTRIE AND HISTRIE AND COUPELIES CASCON HAT	астаны – ты (с. ты 1808 м. – <u>190</u> 1911 Дат 1916 - Зана 1916 - Зана 1917 -	- кнат он м . <u>1</u> 74-то са 177 <u>2 - </u> то солейдени	х 2005 Гон.						
	Friday Co State St	-RIHCIHAL H Swithey Swith Sar Svi Star Svi S	н онгончи сон, енсу еонгор _с ного с сонско <u>Са</u> <u>С</u> е 1995 година и will be placed on a pri	HIS TRUE AND CONTRACTOR AND ELLES BASCON MAILES	аланы - тр. 1011 н 1999 - тр. 100 - тр. 1911 — Дал 1914 - Stees For Furd 1914 - Stees For Furd	- кнат он м 	1917 2015 Ion						
•	Forders and State and State Free Constitution This site is a f	-Riteriean e Sofoos Sof	н антонала (рак енем констанунот с с канала (<u>Дау Д</u> с тура с тура и will be placed on a pri u will be placed on a pri	HIS TRUE AND CONCELLEN	2014 FL - 3 F (C. 1 F 2014 FL - 3 F (C. 1 F 2014 FL - 3 F 1110 Jan 1010 Jan 1010 Jan 1010 Flore Flore Flore Flore 1110 Jan 1110	- кнал он м _{- М} инис са 77 <u>22 - Д</u> ти considerat	х 1-17 В. Д. Б. Кол.						
	Forder C The PTH ANY STOCK SEPTRE FOR This size is a This size is a This size is a This size is a	Portage Solare Solare Solare Solare Thisclose	H WH WH VICE IN CHECK ROUND (HOTE) I WH WE placed on a pri WWH WE placed on a pri	HISTRIE AND CONTRACTOR	2003 40- 08 2003 40- 08 2110 Jan 2007 204 2017	- кнат ор м . <u></u>	8 205 Ion						

I appreciate the opportunity to work with you and your staff on these projects. Please call either myself, at the number below, or Marvin Burrows (ROC) at 505-393-9174, if you have any questions or wish to discuss these matters.

Thank you for your consideration.

Sincerely,

L. Peter (**Pete**) Galusky, Jr. Ph.D., P.G. *Principal*

Texerra

505 N. Big Spring, Suite 404 Midland, Texas 70701 Tel: 432-634-9257 E-mail: <u>lpg@texerra.com</u> Web site: www.texerra.com

cc: Rice Operating Company

Attachments: Site Maps, Junction Box Disclosure Reports as noted