1R - 428-69

WORKPLANS

DATE: May 6, 2009

Hansen, Edward J., EMNRD

From: Sent:

Hack Conder [hconder@riceswd.com] Wednesday, July 29, 2009 3:24 PM

To:

Hansen, Edward J., EMNRD

Subject:

FW: Hobbs O-5

Attachments:

O-5 vent ICP Amendment 5.6.09.pdf

Ed,

If you could look this over for me and see if you think it would be okay to install and up gradient well. We are trying to put together one more week of drilling for this year I would like to include this into that schedule.

Hack Conder Environmental Manager Rice Operating Company 575-393-9174 fax 575-397-1471

This inbound email has been scanned by the MessageLabs Email Security System.

R. T. HICKS CONSULTANTS, LTD.

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

May 6, 2009

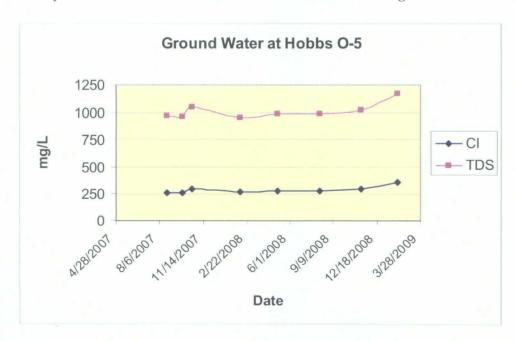
Brad A. Jones Oil Conservation Division 1220 S. St. Francis Drive Santa Fe, NM 87505

RE:

Investigation & Characterization Plan Amendment Up-gradient Monitoring Well Proposal O-5 Vent, Section 05, T19S, R38E, Unit "O" NMOCD Case #: 1R428-69

Dear Mr. Jones,

R.T. Hicks Consultants, Ltd. submitted a Ground Water Status Report for the O-5 Vent site located in the Hobbs Salt Water Disposal System (SWD) dated January 14, 2008. That letter summarized ground water data collected at the site in 2007 and proposed obtaining four additional quarters of data to determine if an additional well is necessary to characterize background conditions and identify the source of chloride in ground water. The graph below presents chloride and TDS data from the O-5 monitoring well to date.



One monitoring well was installed at the site in August of 2007. The three sampling events in 2007 showed an average chloride concentration of 273 mg/L and a TDS concentration of 994 mg/L. With an additional four quarters of ground water monitoring, the average chloride concentration is 279 mg/L and the average TDS concentration is 990 mg/L. As the graph illustrates, 2008 has shown no statistical difference in chloride from concentrations observed in 2007. A table presenting all collected ground water data for the Hobbs O-5 site

appears below this letter. Chloride concentrations remain slightly above ground water standards, which may be due to regional chloride levels.

We propose drilling an up gradient well to characterize background conditions and to determine if the chloride in ground water originates at the O-5 site or an up gradient source. We propose to drill this well with a 4" casing and 40' of screen so that it may double as a replacement source of ground water in the event that it is clean in a location useful to the landowner. Plate 1 shows the site location in relation to Hobbs, a recent potentiometric surface map, and our proposed well area to be discussed with the landowner. Plate 2 presents our proposed well construction.

Thank you for your consideration of this proposed amendment to our Investigation and Characterization Plan for this site. If you have any questions, please contact us at 505-266-5004, or Hack Conder at ROC, 505-393-9174.

Sincerely,

R.T. Hicks Consultants, Ltd.

Katie Lee

Project Scientist

Katie Lee

CC: H

Hack Conder, Rice Operating Company

NMOCD, Edward J. Hansen

Ground Water Data from Hobbs O-5

| MW | Sample Date | CI | TDS | Benzene | Toluene | Ethyl Benzene | Total Xylenes |
|----|-------------|-----|------|---------------------|---------|---------------|---------------|
| 1 | 8/23/2007 | 264 | 968 | <0.002 | <0.002 | <0.002 | <0.006 |
| 1 | 9/27/2007 | 260 | 963 | 0.002 | <0.001 | <0.001 | < 0.003 |
| 1 | 10/19/2007 | 296 | 1052 | 0.003 | 0.001 | <0.001 | <0.003 |
| 1 | 2/7/2008 | 272 | 949 | 0.003 | 0.001 | <0.001 | <0.003 |
| 1 | 5/2/2008 | 284 | 985 | <0.002 | <0.002 | <0.002 | <0.006 |
| 1 | 8/8/2008 | 280 | 992 | <0.001 ⁻ | <0.001 | <0.001 | < 0.003 |
| 1 | 11/12/2008 | 296 | 1020 | <0.001 | <0.001 | <0.001 | < 0.003 |
| 1 | 2/2/2009 | 356 | 1170 | <0.001 | <0.001 | < 0.001 | < 0.003 |



