



# **VANGUARD NATURAL RESOURCES**

5847 San Felipe, Suite 3000  
Houston, Texas 77057  
(832) 327-2255

## **Candelario 24 #1 SWD Battery 2RP-2400**

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# **Corrective Action Plan**

API No. 30-015-26536

Release Date: July 8<sup>th</sup>, 2014

Unit Letter E, Section 24, Township 23S, Range 28E

**October 13<sup>th</sup>, 2014**

**Mike Bratcher**

New Mexico Energy, Minerals, & Natural Resources  
Oil Conservation Division, Environmental Bureau – District 2  
811 S. First St.  
Artesia, NM 88210

**RE: Corrective Action Plan  
Vanguard Candelario 24 #1 SWD Battery (2RP-2400)  
UL/E sec. 24 T23S R28E  
API No. 30-015-26536**

Mr. Bratcher:

Vanguard Permian (Vanguard) has retained Rice Environmental Consulting and Safety (RECS) to address potential environmental concerns at the above-referenced site.

**Background and Previous Work**

The site is located approximately 3 miles east of Loving, New Mexico at UL/E sec. 24 T23S R28E. USGS records indicate that groundwater will likely be encountered at a depth of approximately 40 +/- feet.

On July 8<sup>th</sup>, 2014, Vanguard discovered a release of produced water from a cut in a 4 inch poly line. The cut released greater than 50 barrels of produced water over 2,251 square feet of pasture land. None of this fluid was recovered. An initial C-141 was submitted to NMOCD on July 28<sup>th</sup>, 2014, and was approved on July 29<sup>th</sup>, 2014 (Appendix A).

RECS personnel were on site beginning on July 15<sup>th</sup>, 2014, to assess the release. Surface samples were taken from two points within the release area, and the samples were field tested for chlorides and organic vapors (Figure 1). The samples were then taken to a commercial laboratory for analysis. Both samples returned elevated laboratory chloride readings and Gasoline Range Organics (GRO) readings of non-detect. Diesel Range Organics (DRO) readings returned a value for Point 1 of 26.9 mg/kg and for Point 2 of 16.3 mg/kg (Appendix B).

To determine the depth of the chloride contamination, verticals were installed at each point. The vertical at Point 1 was installed to a depth of 3 ft bgs, and the vertical at Point 2 was installed to a depth of 4 ft bgs. Bottom samples were taken from the base of each vertical, and the samples were field tested for chlorides and organic vapors. The samples were then taken to a commercial laboratory for analysis. Both samples returned elevated laboratory chloride readings and GRO and DRO readings of non-detect. Based on the laboratory readings from the base of each vertical, Point 1 was then extended to a depth of 18 ft bgs, and Point 2 was extended to a depth of 15 ft bgs. While these verticals were advanced, samples were taken every foot and field tested

for chlorides and organic vapors. At the base of each vertical, field data indicated that chloride levels had not relented with depth.

On September 9<sup>th</sup>, 2014, two soil bores were installed at Point 1 and Point 2 to continue vertical delineation of chloride contamination. Both soil bores were installed to a depth of 36 ft bgs (Appendix C). In both soil bores, samples were taken at regular intervals and field tested for chlorides and organic vapors. Representative samples from each bore were taken to commercial laboratory for analysis. SB-1 returned a laboratory chloride reading of 13,800 mg/kg at 21 ft bgs and a reading of 14,600 mg/kg at 36 ft bgs. SB-2 returned a laboratory chloride reading of 6,720 mg/kg at 21 ft bgs and a reading of 2,480 mg/kg at 36 ft bgs. GRO and DRO readings in both bores at all depths returned values of non-detect.

Photo documentation of the field activities can be found in Appendix D.

### **Corrective Action Plan**

Based on the laboratory analyses conducted at the site, the release area will be excavated to a depth of 4 ft bgs (Figure 2). At the base of the excavation, a 20-mil reinforced poly liner will be installed and properly seated. All excavated soil will be taken to a NMOCD approved facility for disposal. Clean top soil will be imported to the site to serve as backfill. A sample of this top soil will be taken to a commercial laboratory to confirm that its chloride value is below regulatory standards. The excavation will be backfilled with the imported soil and contoured to the surrounding location. The disturbed area will then be seeded with a blend on native vegetation.

It is evident from the soil bore data that the release may have affected groundwater beneath the site. Therefore, a near-source monitor well will be installed approximately 25 ft down-gradient of the site. The well will be installed to NMOCD and EPA standards. The monitor well will be sampled quarterly, and the samples will be taken to a commercial laboratory for analysis. Based on the sampling from the monitor well, additional monitor wells may be installed as needed to fully delineate groundwater quality. Once groundwater quality has been delineated, a report will be submitted to NMOCD either asking for 'remediation termination' and site closure or with a path forward for a groundwater remedy.

RECS appreciates the opportunity to work with you on this project. Please call Hack Conder at (575) 393-2967 or me if you have any questions or wish to discuss the site.

Sincerely,



Lara Weinheimer  
Project Scientist  
RECS  
(575) 441-0431

Attachments:

Figure 1 – Initial Sampling Data

Figure 2 – Proposed Corrective Actions

Appendix A – Initial C-141

Appendix B – Initial Sampling Lab

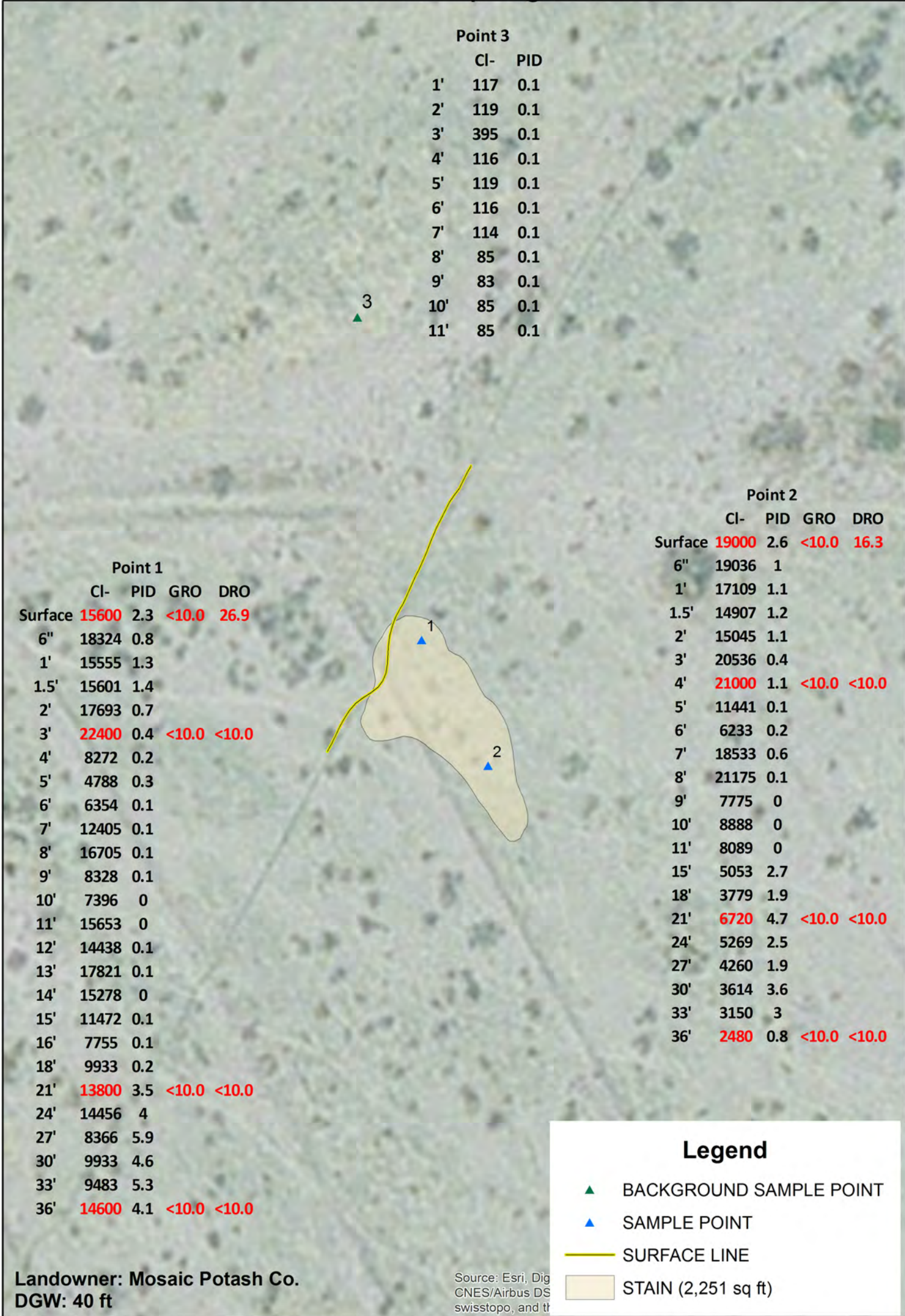
Appendix C – Soil Bore Installation Documentation

Appendix D – Photo Documentation

# Figures



Initial Sampling Data



**RECS**  
RICE ENVIRONMENTAL  
CONSULTING & SAFETY

**VANGUARD  
CANDELARIO 24  
#1 SWD BATTERY**

UL E SECTION 24  
T-23-S R-28-E  
EDDY COUNTY, NM

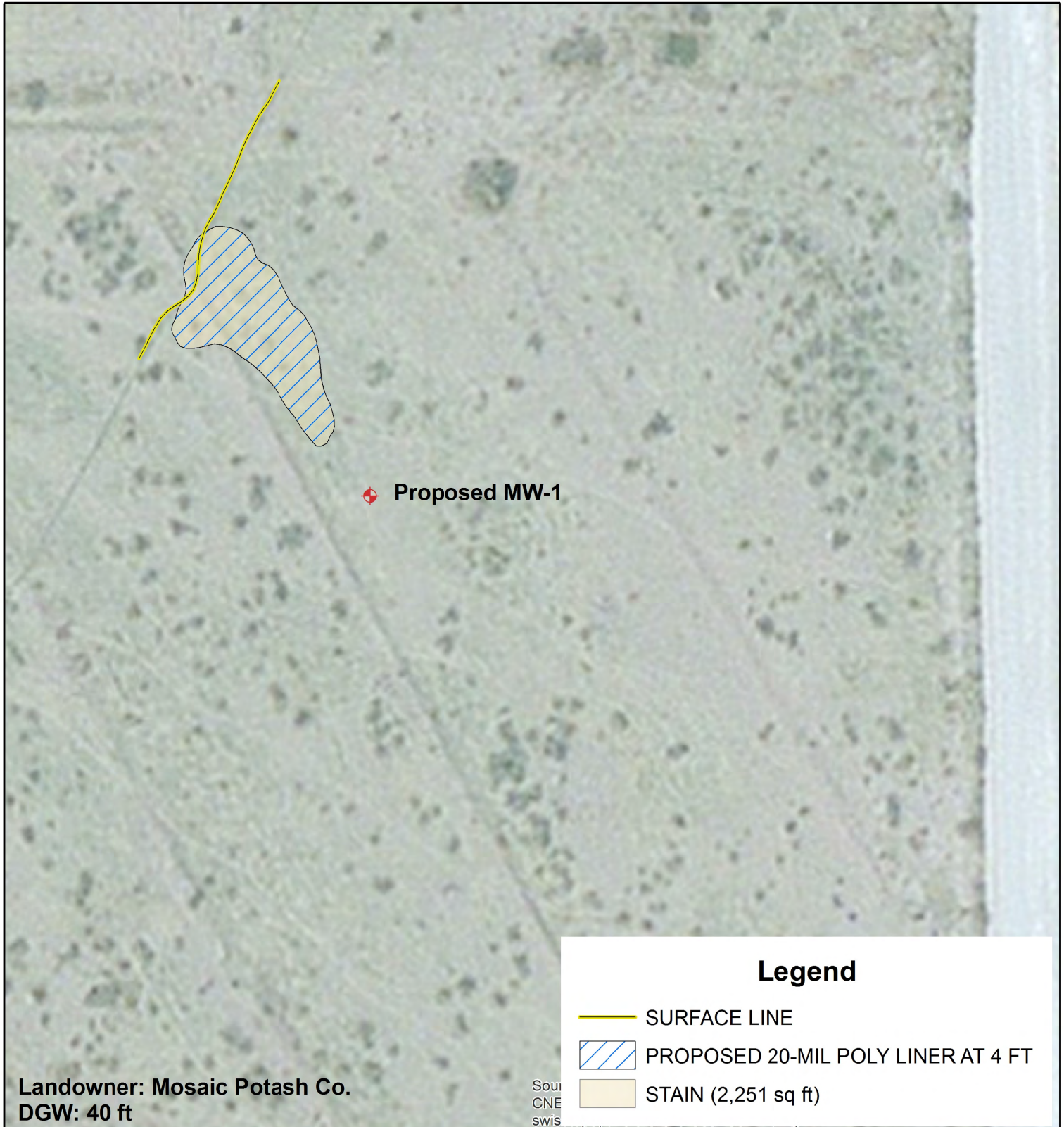
**Figure 1**

0 30 60 Feet

GPS date: 7/15/14 CF, 8/4/14 KS  
Drawing date: 9/16/14  
Drafted by: T. Grieco/L. Weinheimer



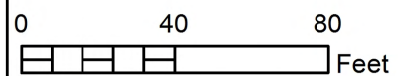
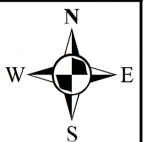
# Proposed Corrective Actions



**VANGUARD  
CANDELARIO 24  
#1 SWD BATTERY**

UL E SECTION 24  
T-23-S R-28-E  
EDDY COUNTY, NM

Figure 2



GPS date: 7/15/14 CF, 8/4/14 KS  
Drawing date: 9/29/14  
Drafted by: L. Weinheimer

# Appendix A

Initial C-141



District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in  
accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

*NAB1420957230*

OPERATOR

☒ Initial Report ☐ Final Report

|   |               |                             |
|---|---------------|-----------------------------|
| Name of Company Vanguard Permian                      | <i>258350</i> | Contact Mike Jones          |
| Address 5847 San Felipe, Suite 3000, Houston TX 77057 |               | Telephone No. (575)390-4611 |
| Facility Name Candelario 24 #1 SWD Battery            |               | Facility Type Line Release  |
| Surface Owner Mosaic Potash Co.                       | Mineral Owner | API No. 30-015-26536        |

LOCATION OF RELEASE

| Unit Letter | Section | Township | Range | Feet from the | North/South Line | Feet from the | East/West Line | County |
|-------------|---------|----------|-------|---------------|------------------|---------------|----------------|--------|
| E           | 24      | 23S      | 28E   | 1378          | FNL              | 915           | FWL            | Eddy   |

Latitude 32.294403 Longitude -104.046428

NATURE OF RELEASE

|   |   |  |
|---|---|--|
| Type of Release Produced Water  | Volume of Release >50 bbls                  | Volume Recovered 0 bbls                            |
| Source of Release 4 inch poly line  | Date and Hour of Occurrence<br>July 8, 2014 | Date and Hour of Discovery<br>July 8, 2014, 3:00pm |
| Was Immediate Notice Given?<br><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required  | If YES, To Whom?                            |  |
| By Whom? Mike Jones   | Date and Hour                               |  |
| Was a Watercourse Reached?<br><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No   | If YES, Volume Impacting the Watercourse.   |  |
| If a Watercourse was Impacted, Describe Fully.*   |   |  |
| JUL 28 2014   |   |  |
| RECEIVED  |   |  |
| Describe Cause of Problem and Remedial Action Taken.*<br>The cut was found in the 4 inch poly line, which released >50 barrels over 2,251 sq ft of pasture land. The line was repaired.                     |   |  |
| Describe Area Affected and Cleanup Action Taken.*<br>A total of 2,251 sq ft of pasture land was affected by the release. The site will be assessed and a Corrective Action Plan will be submitted to NMOCD. |   |  |

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

|  |  |   |                            |
|--|--|---|----------------------------|
| Signature: <i>Mike Jones</i>             |  | OIL CONSERVATION DIVISION   |                            |
| Printed Name: Mike Jones                 |  | Approved by Environmental Specialist: <i>HP</i>   |                            |
| Title: Production Foreman                |  | Approval Date: <i>7/29/14</i>   | Expiration Date: <i>NA</i> |
| E-mail Address: <i>mjones@vnrllc.com</i> |  | Conditions of Approval:   |                            |
| Date: _____ Phone: (575)390-4611         |  | Remediation per OCD Rule & Guidelines. SUBMIT REMEDIATION PROPOSAL NO LATER THAN:<br><i>8/29/14</i> |                            |
|  |  | Attached <input type="checkbox"/>   |                            |

\* Attach Additional Sheets If Necessary

*RP2-2400*

# Appendix B

## Initial Sampling Lab

**RICE Environmental Consulting and Safety (RECS)**  
P.O. Box 2948 Hobbs, NM 88241  
Phone 575.393.2967



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

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July 21, 2014

LAURA FLORES

RICE ENVIRONMENTAL CONSULTING & SAFETY LLC

419 W. CAIN

HOBBS, NM 88240

RE: 24 #1 SWD BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 07/17/14 10:10.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

|                  |                              |
|------------------|------------------------------|
| Method EPA 552.2 | Haloacetic Acids (HAA-5)     |
| Method EPA 524.2 | Total Trihalomethanes (TTHM) |
| Method EPA 524.4 | Regulated VOCs (V1, V2, V3)  |

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager

**Analytical Results For:**

RICE ENVIRONMENTAL CONSULTING & SAFETY  
LAURA FLORES  
419 W. CAIN  
HOBBS NM, 88240  
Fax To: (575) 397-1471

Received: 07/17/2014  
Reported: 07/21/2014  
Project Name: 24 #1 SWD BATTERY  
Project Number: NONE GIVEN  
Project Location: CANDELARIO

Sampling Date: 07/15/2014  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: PT. 1 @ SURFACE (H402172-01)**

| Chloride, SM4500Cl-B   |              | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |
|------------------------|--------------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte                | Result       | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| <b>Chloride</b>        | <b>15600</b> | 16.0            | 07/21/2014 | ND              | 432 | 108        | 400           | 3.77 |           |
| TPH 8015M              |              | mg/kg           |            | Analyzed By: MS |     |            |               |      |           |
| Analyte                | Result       | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| GRO C6-C10             | <10.0        | 10.0            | 07/18/2014 | ND              | 174 | 86.9       | 200           | 5.90 |           |
| <b>DRO &gt;C10-C28</b> | <b>26.9</b>  | 10.0            | 07/18/2014 | ND              | 187 | 93.5       | 200           | 6.11 |           |

Surrogate: 1-Chlorooctane 106 % 65.2-140

Surrogate: 1-Chlorooctadecane 117 % 63.6-154

**Sample ID: PT. 1 @ 3' (H402172-02)**

| Chloride, SM4500Cl-B |              | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |
|----------------------|--------------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte              | Result       | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| <b>Chloride</b>      | <b>22400</b> | 16.0            | 07/21/2014 | ND              | 416 | 104        | 400           | 3.92 |           |
| TPH 8015M            |              | mg/kg           |            | Analyzed By: MS |     |            |               |      |           |
| Analyte              | Result       | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| GRO C6-C10           | <10.0        | 10.0            | 07/18/2014 | ND              | 174 | 86.9       | 200           | 5.90 |           |
| DRO >C10-C28         | <10.0        | 10.0            | 07/18/2014 | ND              | 187 | 93.5       | 200           | 6.11 |           |

Surrogate: 1-Chlorooctane 113 % 65.2-140

Surrogate: 1-Chlorooctadecane 120 % 63.6-154

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



**Analytical Results For:**

RICE ENVIRONMENTAL CONSULTING & SAFETY  
LAURA FLORES  
419 W. CAIN  
HOBBS NM, 88240  
Fax To: (575) 397-1471

Received: 07/17/2014  
Reported: 07/21/2014  
Project Name: 24 #1 SWD BATTERY  
Project Number: NONE GIVEN  
Project Location: CANDELARIO

Sampling Date: 07/15/2014  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: PT. 2 @ SURFACE (H402172-03)**

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| Chloride             | 19000  | 16.0            | 07/21/2014 | ND              | 416 | 104        | 400           | 3.92 |           |
| TPH 8015M            |        | mg/kg           |            | Analyzed By: MS |     |            |               |      |           |
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| GRO C6-C10           | <10.0  | 10.0            | 07/18/2014 | ND              | 174 | 86.9       | 200           | 5.90 |           |
| DRO >C10-C28         | 16.3   | 10.0            | 07/18/2014 | ND              | 187 | 93.5       | 200           | 6.11 |           |

Surrogate: 1-Chlorooctane 114 % 65.2-140

Surrogate: 1-Chlorooctadecane 127 % 63.6-154

**Sample ID: PT. 2 @ 4' (H402172-04)**

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 21000  | 16.0            | 07/21/2014 | ND              | 416 | 104        | 400           | 3.92 |           |  |
| TPH 8015M            |        | mg/kg           |            | Analyzed By: MS |     |            |               |      |           |  |
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| GRO C6-C10           | <10.0  | 10.0            | 07/18/2014 | ND              | 174 | 86.9       | 200           | 5.90 |           |  |
| DRO >C10-C28         | <10.0  | 10.0            | 07/18/2014 | ND              | 187 | 93.5       | 200           | 6.11 |           |  |

Surrogate: 1-Chlorooctane 106 % 65.2-140

Surrogate: 1-Chlorooctadecane 111 % 63.6-154

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

|     |  |
|-----|--|
| ND  | Analyte NOT DETECTED at or above the reporting limit   |
| RPD | Relative Percent Difference  |
| **  | Samples not received at proper temperature of 6°C or below.  |
| *** | Insufficient time to reach temperature.  |
| -   | Chloride by SM4500Cl-B does not require samples be received at or below 6°C<br>Samples reported on an as received basis (wet) unless otherwise noted on report |

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Cardinal Laboratories

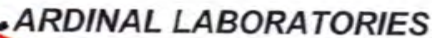
\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



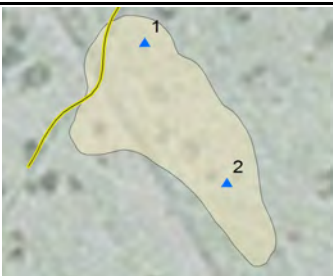

### CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

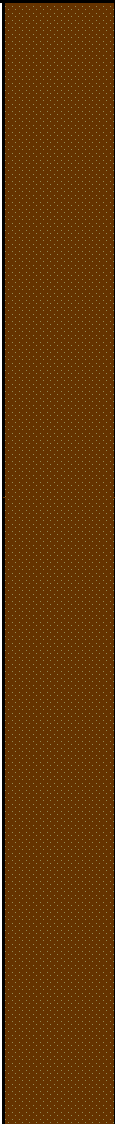
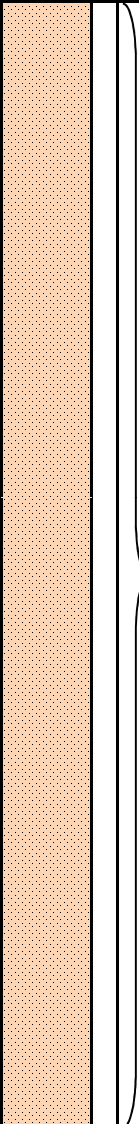
# Appendix C



## Soil Bore Installation Documentation

**RICE Environmental Consulting and Safety (RECS)**  
P.O. Box 2948 Hobbs, NM 88241  
Phone 575.393.2967

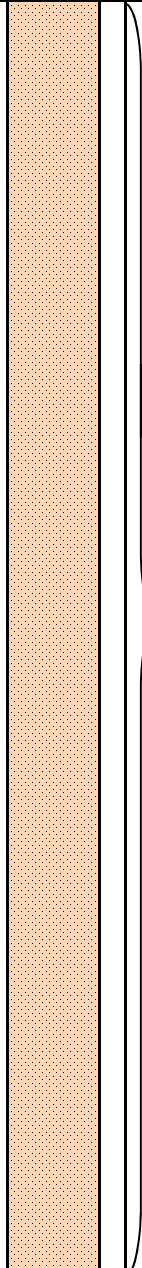


|  |   |   |  |  |
|--|---|---|--|--|
| <b>Logger:</b><br><br><b>Driller:</b><br><br><b>Drilling Method:</b><br><b>Start Date:</b><br><b>End Date:</b> | Amber Groves<br><br>Harrison & Cooper, Inc.<br><br>Air Rotary<br>9/9/2014<br>9/9/2014 |    |   |  |
| <b>Comments:</b><br>All samples were taken from cuttings.  |   |   | <b>Company:</b> Vanguard<br><b>Project Name:</b> Candelario 24 #1 SWD<br><b>Well ID:</b> SB-1<br><b>Project Consultant:</b> RECS |  |
| <b>DRAFTED BY:</b> L Weinheimer<br>TD = 36 ft      GW = 40 ft  |   | <b>Location:</b> UL/E sec. 24 T23S R28E<br><br><b>Lat:</b> 32°17'39.899"N <b>County:</b> Eddy<br><b>Long:</b> 104°2'46.995"W <b>State:</b> NM |  |  |

| Depth (feet) | Chloride field tests | LAB      | PID | Description                | Lithology   | Well Construction  |
|--------------|----------------------|----------|-----|----------------------------|---|--|
| 18 ft        | 9933                 |          | 0.2 | Brown sand with river rock |  | <br>Bentonite Seal |
|              |                      |          |     |                            |   |  |
|              |                      |          |     |                            |   |  |
| 21 ft        | 12698                | CI-13800 | 3.5 |                            |   |  |
|              |                      | GRO <10  |     |                            |   |  |
|              |                      | DRO <10  |     |                            |   |  |
| 24 ft        | 14456                |          | 4   |                            |   |  |
|              |                      |          |     |                            |   |  |
|              |                      |          |     |                            |   |  |
| 27 ft        | 8366                 |          | 5.9 |                            |   |  |
|              |                      |          |     |                            |   |  |
|              |                      |          |     |                            |   |  |
| 30 ft        | 9933                 |          | 4.6 |                            |   |  |
|              |                      |          |     |                            |   |  |
|              |                      |          |     |                            |   |  |
| 33 ft        | 9483                 |          | 5.3 |                            |   |  |
|              |                      |          |     |                            |   |  |
|              |                      |          |     |                            |   |  |
| 36 ft        | 9119                 | CI-14600 | 4.1 |                            |   |  |
|              |                      | GRO <10  |     |                            |   |  |
|              |                      | DRO <10  |     |                            |   |  |

|                                       |                         |   |   |                      |
|---------------------------------------|-------------------------|---|---|----------------------|
| <b>Logger:</b>                        | Amber Groves            |  |  |                      |
| <b>Driller:</b>                       | Harrison & Cooper, Inc. |   |   |                      |
| <b>Drilling Method:</b>               | Air Rotary              |   | <b>Company:</b>   | Vanguard             |
| <b>Start Date:</b>                    | 9/9/2014                |   | <b>Project Name:</b>  | Candelario 24 #1 SWD |
| <b>End Date:</b>                      | 9/9/2014                | <b>Well ID:</b>   | SB-2  |                      |
| <b>Comments:</b>                      |                         | <b>Project Consultant:</b>  | RECS  |                      |
| All samples were taken from cuttings. |                         | <b>Location:</b>  | UL/E sec. 24 T23S R28E  |                      |
| <b>DRAFTED BY:</b> L Weinheimer       |                         | <b>Lat:</b> 32°17'39.446"N  | <b>County:</b> Eddy   |                      |
| TD = 36 ft      GW = 40 ft            |                         | <b>Long:</b> 104°2'46.723"W   | <b>State:</b> NM  |                      |

| Depth (feet) | Chloride field tests | LAB     | PID | Description                | Lithology | Well Construction  |
|--------------|----------------------|---------|-----|----------------------------|-----------|--|
| 15 ft        | 5053                 |         | 2.7 | Brown sand with river rock |           |  <div>Bentonite Seal</div> |
|              |                      |         |     |                            |           |  |
|              |                      |         |     |                            |           |  |
| 18 ft        | 3779                 |         | 1.9 |                            |           |  |
|              |                      |         |     |                            |           |  |
|              |                      |         |     |                            |           |  |
| 21 ft        | 5590                 | CI-6720 | 4.7 |                            |           |  |
|              |                      | GRO <10 |     |                            |           |  |
|              |                      | DRO <10 |     |                            |           |  |
| 24 ft        | 5269                 |         | 2.5 |                            |           |  |
|              |                      |         |     |                            |           |  |
|              |                      |         |     |                            |           |  |
| 27 ft        | 4260                 |         | 1.9 |                            |           |  |
|              |                      |         |     |                            |           |  |
|              |                      |         |     |                            |           |  |
| 30 ft        | 3614                 |         | 3.6 |                            |           |  |
|              |                      |         |     |                            |           |  |
|              |                      |         |     |                            |           |  |
| 33 ft        | 3150                 |         | 3   |                            |           |  |
|              |                      |         |     |                            |           |  |
|              |                      |         |     |                            |           |  |
| 36 ft        | 2614                 | CI-2480 | 0.8 |                            |           |  |
|              |                      | GRO <10 |     |                            |           |  |
|              |                      | DRO <10 |     |                            |           |  |

September 15, 2014

KYLE NORMAN

RICE ENVIRONMENTAL CONSULTING & SAFETY LLC

419 W. CAIN

HOBBS, NM 88240

RE: CANDELARIO 24 #1 SWD BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 09/09/14 15:54.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

|                  |                              |
|------------------|------------------------------|
| Method EPA 552.2 | Haloacetic Acids (HAA-5)     |
| Method EPA 524.2 | Total Trihalomethanes (TTHM) |
| Method EPA 524.4 | Regulated VOCs (V1, V2, V3)  |

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Celey D. Keene

Lab Director/Quality Manager

**Analytical Results For:**

RICE ENVIRONMENTAL CONSULTING & SAFETY  
KYLE NORMAN  
419 W. CAIN  
HOBBS NM, 88240  
Fax To: (575) 397-1471

|                   |                              |                     |               |
|-------------------|------------------------------|---------------------|---------------|
| Received:         | 09/09/2014                   | Sampling Date:      | 09/09/2014    |
| Reported:         | 09/15/2014                   | Sampling Type:      | Soil          |
| Project Name:     | CANDELARIO 24 #1 SWD BATTERY | Sampling Condition: | Cool & Intact |
| Project Number:   | NOT GIVEN                    | Sample Received By: | Kathy Perez   |
| Project Location: | NOT GIVEN                    |                     |               |

**Sample ID: SB1 @ 21FT (H402799-01)**

| Chloride, SM4500Cl-B                 |              | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |
|--------------------------------------|--------------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte                              | Result       | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| <b>Chloride</b>                      | <b>13800</b> | 16.0            | 09/11/2014 | ND              | 400 | 100        | 400           | 0.00 |           |
| TPH 8015M                            |              | mg/kg           |            | Analyzed By: ms |     |            |               |      |           |
| Analyte                              | Result       | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| GRO C6-C10                           | <10.0        | 10.0            | 09/11/2014 | ND              | 181 | 90.5       | 200           | 3.80 |           |
| DRO >C10-C28                         | <10.0        | 10.0            | 09/11/2014 | ND              | 212 | 106        | 200           | 10.2 |           |
| <i>Surrogate: 1-Chlorooctane</i>     |              | 99.7 %          | 65.2-140   |                 |     |            |               |      |           |
| <i>Surrogate: 1-Chlorooctadecane</i> |              | 105 %           | 63.6-154   |                 |     |            |               |      |           |

**Sample ID: SB1 @ 36FT (H402799-02)**

| Chloride, SM4500Cl-B                 |              | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |
|--------------------------------------|--------------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte                              | Result       | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| <b>Chloride</b>                      | <b>14600</b> | 16.0            | 09/11/2014 | ND              | 400 | 100        | 400           | 0.00 |           |
| TPH 8015M                            |              | mg/kg           |            | Analyzed By: ms |     |            |               |      |           |
| Analyte                              | Result       | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| GRO C6-C10                           | <10.0        | 10.0            | 09/11/2014 | ND              | 181 | 90.5       | 200           | 3.80 |           |
| DRO >C10-C28                         | <10.0        | 10.0            | 09/11/2014 | ND              | 212 | 106        | 200           | 10.2 |           |
| <i>Surrogate: 1-Chlorooctane</i>     |              | 102 %           | 65.2-140   |                 |     |            |               |      |           |
| <i>Surrogate: 1-Chlorooctadecane</i> |              | 112 %           | 63.6-154   |                 |     |            |               |      |           |

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



**Analytical Results For:**

RICE ENVIRONMENTAL CONSULTING & SAFETY  
KYLE NORMAN  
419 W. CAIN  
HOBBS NM, 88240  
Fax To: (575) 397-1471

|                   |                              |                     |               |
|-------------------|------------------------------|---------------------|---------------|
| Received:         | 09/09/2014                   | Sampling Date:      | 09/09/2014    |
| Reported:         | 09/15/2014                   | Sampling Type:      | Soil          |
| Project Name:     | CANDELARIO 24 #1 SWD BATTERY | Sampling Condition: | Cool & Intact |
| Project Number:   | NOT GIVEN                    | Sample Received By: | Kathy Perez   |
| Project Location: | NOT GIVEN                    |                     |               |

**Sample ID: SB2 @ 21FT (H402799-03)**

| Chloride, SM4500Cl-B          |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |
|-------------------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte                       | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| Chloride                      | 6720   | 16.0            | 09/11/2014 | ND              | 400 | 100        | 400           | 0.00 |           |
| TPH 8015M                     |        | mg/kg           |            | Analyzed By: ms |     |            |               |      |           |
| Analyte                       | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| GRO C6-C10                    | <10.0  | 10.0            | 09/11/2014 | ND              | 181 | 90.5       | 200           | 3.80 |           |
| DRO >C10-C28                  | <10.0  | 10.0            | 09/11/2014 | ND              | 212 | 106        | 200           | 10.2 |           |
|                               |        |                 |            |                 |     |            |               |      |           |
| Surrogate: 1-Chlorooctane     | 103 %  | 65.2-140        |            |                 |     |            |               |      |           |
| Surrogate: 1-Chlorooctadecane | 116 %  | 63.6-154        |            |                 |     |            |               |      |           |

**Sample ID: SB2 @ 36FT (H402799-04)**

| Chloride, SM4500Cl-B          |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |
|-------------------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte                       | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| Chloride                      | 2480   | 16.0            | 09/11/2014 | ND              | 400 | 100        | 400           | 0.00 |           |
| TPH 8015M                     |        | mg/kg           |            | Analyzed By: ms |     |            |               |      |           |
| Analyte                       | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| GRO C6-C10                    | <10.0  | 10.0            | 09/11/2014 | ND              | 181 | 90.5       | 200           | 3.80 |           |
| DRO >C10-C28                  | <10.0  | 10.0            | 09/11/2014 | ND              | 212 | 106        | 200           | 10.2 |           |
|                               |        |                 |            |                 |     |            |               |      |           |
| Surrogate: 1-Chlorooctane     | 101 %  | 65.2-140        |            |                 |     |            |               |      |           |
| Surrogate: 1-Chlorooctadecane | 109 %  | 63.6-154        |            |                 |     |            |               |      |           |

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

|     |  |
|-----|--|
| ND  | Analyte NOT DETECTED at or above the reporting limit   |
| RPD | Relative Percent Difference  |
| **  | Samples not received at proper temperature of 6°C or below.  |
| *** | Insufficient time to reach temperature.  |
| -   | Chloride by SM4500Cl-B does not require samples be received at or below 6°C<br>Samples reported on an as received basis (wet) unless otherwise noted on report |

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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|                                       |                     |   |  |
|---------------------------------------|---------------------|---|--|
| Relinquished By: <i>Kimber Groves</i> | Date: <i>9-9-14</i> | Received By:  | Phone Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Add'l Phone #: |
|                                       | Time:               |   | Fax Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Add'l Fax #:     |
| Relinquished By: <i>P. Edwards</i>    | Date: <i>9-9-14</i> | Received By: <i>Pathy Perry</i>                                     | REMARKS:   |
|                                       | Time: <i>3:54</i>   |   | email results  |
| Delivered By: (Circle One)            |                     | Sample Condition  | Knorman@rice-ecs.com   |
| Sampler - UPS - Bus - Other:          | <i>4.8</i>          | Cool Intact   | Kjones@riceswd.com; jkamplain@rice-ecs.com   |
|                                       |                     | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | hconder@rice-ecs.com; Lweinheimer@rice-ecs.com;  |
|                                       |                     | <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes | sedwards@rice-ecs.com; lflores@rice-ecs.com; agroves@rice-ecs.com                                |
|                                       |                     | CHECKED BY: (Initials) <i>EP</i>                                    |  |

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

#54

# Appendix D

## Photo Documentation

**RICE Environmental Consulting and Safety (RECS)**  
P.O. Box 2948 Hobbs, NM 88241  
Phone 575.393.2967



# Vanguard Candelario 24 #1 SWD Battery

Unit Letter E, Section 24, T23S, R28E



Initial release area, facing northwest

7/15/14



Initial release area, facing southwest

7/15/14



Collecting surface sample, facing west

7/15/14



Hand auguring for depth, facing north

7/15/14





Installing verticals, facing north

8/4/14



Installing soil bores, facing east

9/9/14



Plugging soil bores in total with bentonite, facing east

9/9/14



Completed soil bore

9/9/14