

PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

June 14, 2018

Bradford Billings

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

RE: Investigation and Characterization Plan (ICP)
Rice Operating Company – BD SWD System
BD P-17 Vent (1R426-132): UL/P, Sec. 17, T21S, R37E

Mr. Billings:

RICE Operating Company (ROC) has retained Basin Environmental Service Technologies (BEST) to address potential environmental concerns at the above-referenced site in the BD Salt Water Disposal (SWD) system.

ROC is the service provider (agent) for the BD 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 Parties, who provide all operating capital on a percentage ownership/usage basis.

For all such environmental projects, ROC will choose the 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:

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

Background and Previous Work

The site is located approximately 2.5 miles northwest of Eunice, New Mexico at UL/P, Sec. 17, T21S, R37E as shown on the Geographical Location Map and the Area Map. NM OSE records indicate that groundwater will likely be encountered at a depth of approximately 70 feet below ground surface (bgs). A junction box disclosure report was submitted to NMOCD with all the 2005 junction box closures and disclosures.

In 2005, ROC initiated work on the former P-17 Vent junction box. The site was delineated using a backhoe to form a 30 ft x 20 ft x 12 ft deep excavation and soil samples were screened at regular intervals for hydrocarbons and chlorides. From the excavation, a 4-wall composite sample, a bottom composite sample, and a backfill composite sample were sent to a commercial laboratory for analysis. The 4-wall composite returned a chloride reading of 837 mg/kg and a Gasoline Range Organics (GRO) reading non-detect and a Diesel Range Organics (DRO) reading of non-detect. The bottom composite sample returned a chloride reading of 1,600 mg/kg, a GRO reading of non-detect and a DRO reading of non-detect. The backfill sample returned a chloride reading of 894 mg/kg, a GRO reading of 7.12 mg/kg and a DRO reading of 121 mg/kg. A one-foot compacted clay liner was installed at 6 feet bgs. The excavation was then backfilled with blended soils and contoured to the surrounding area. On 9/7/2006, the site was seeded with a blend of native vegetation. A junction box is no longer required at the site.

ROC proposes additional investigative work at the site to determine if there is potential for groundwater degradation from residual constituents at the site.

Proposed Work Elements

- 1. Conduct vertical and lateral delineation of residual chlorides and hydrocarbons from samples taken using a drill rig, hand augur and/or backhoe.
 - a. Vertical sampling will be conducted until of the following criteria are met in the field.
 - i. Three samples in which the chloride concentration decreases, and the third sample has a chloride concentration of ≤ 600 ppm; and,
 - ii. Three samples in which PID readings decrease and the third sample has a PID reading of ≤ 100 ppm; or,
 - iii. The sampling reaches the capillary fringe.
 - b. Lateral sampling will be conducted until the following criteria are met in the field.
 - i. A decrease is observed in chloride concentrations between lateral bores at similar depths; and,
 - ii. A chloride concentration of \leq 600 ppm is observed in a lateral surface sample; or,
 - iii. Safety concerns impede further lateral delineation.

- 2. If warranted, install a monitor well to provide direct measurement of the potential groundwater impact at the site. (All monitor wells will be installed by EPA, NMOCD, and industry standards.)
- 3. Evaluate the risk of groundwater impact based on the information obtained.

If the evaluation of the site shows no threat to groundwater from residual constituents, then only a vadose zone remedy will be undertaken. However, if groundwater shows impact from residual chlorides, a CAP will be developed to address these concerns.

Please contact me at (505) 920-4965 or Katie Jones Davis at (575) 393-9174 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,

Edward J. Hänsen Senior Hydrologist

BEST

enclosures

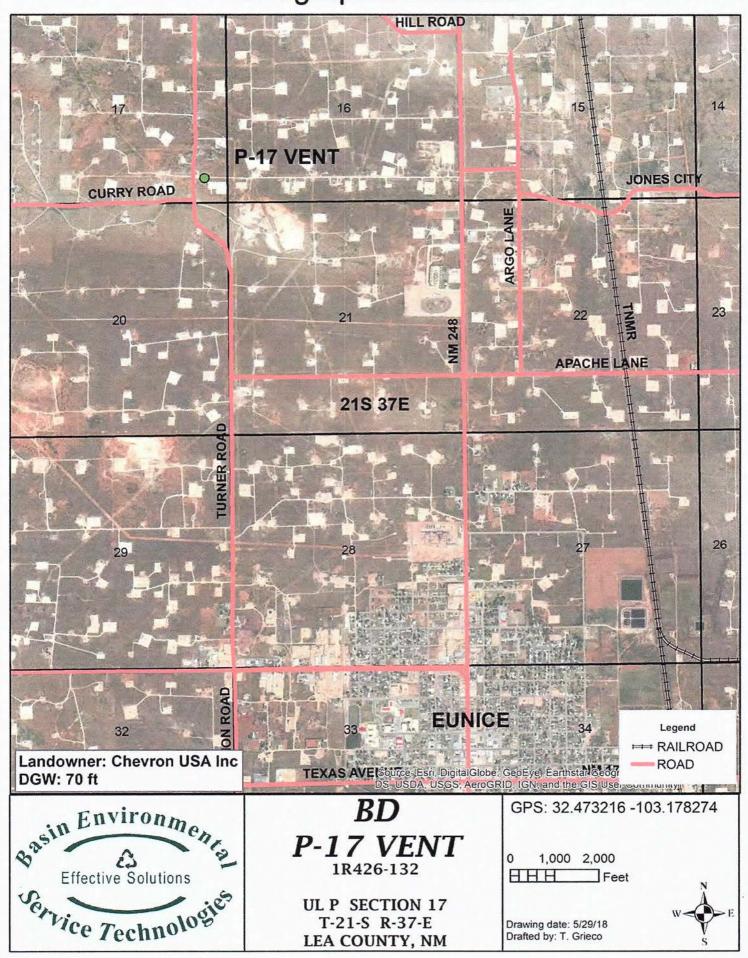
Figures

Basin Environmental Service Technologies (BEST)

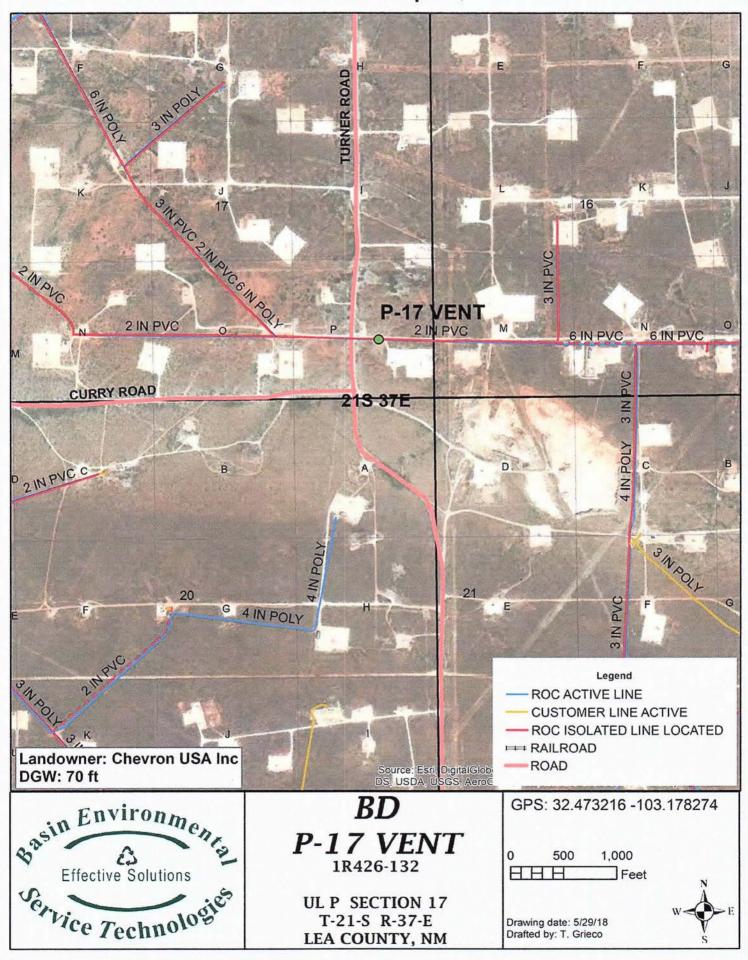
P.O. Box 2948, Hobbs, NM 88241

Phone: 575-393-2967

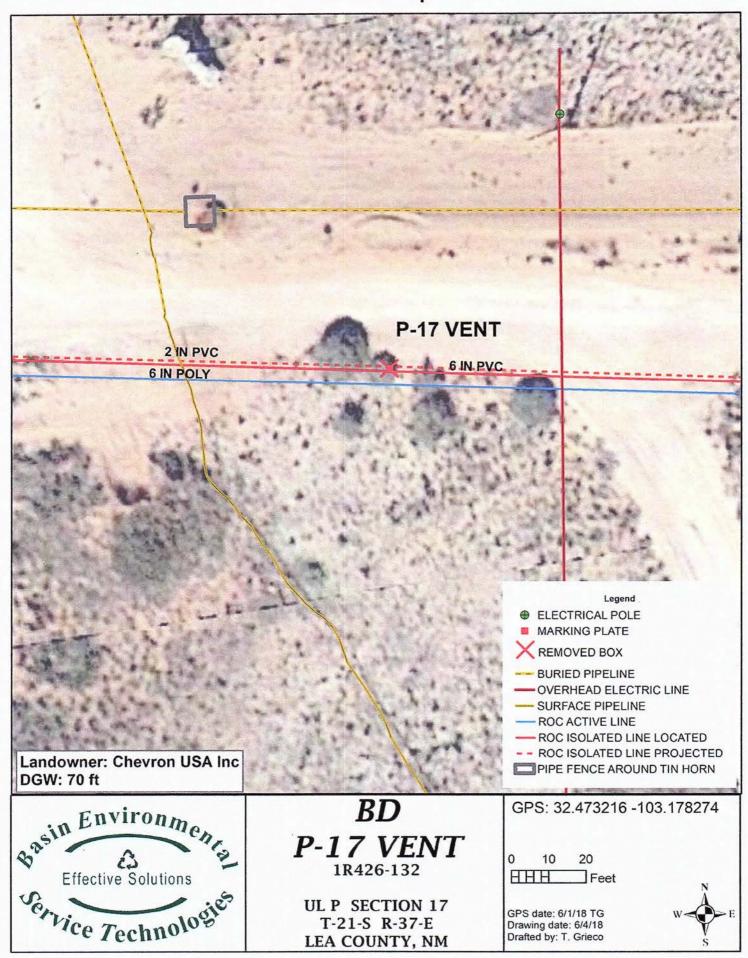
Geographic Location



Area Map



Base Map



Disclosure Report

Basin Environmental Service Technologies (BEST)

P.O. Box 2948, Hobbs, NM 88241

Phone: 575-393-2967

RICE OPERATING COMPANY JUNCTION BOX DISCLOSURE* REPORT

				BOX LOCA	TION				
SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNT	Y NEW BOX	DIMENSION	S-FEET
BD	P-17 vent	Р	17	218	37E	Lea	Length	Width	Depth
		L	J			L	no b	oxjct. elimina	tea
LAND TYPE: BL	MST	ATE	_FEE LAND	OWNER	Millard I	Deck	OTHER		
Depth to Ground	water	70	feet	NMOCD	SITE ASSE	SSMEN	RANKING S	CORE:	10
Date Started _	4/19/2	005	Date Co	mpleted	7/7/2006	NM	OCD Witness	r	10
Soil Excavated _	267	cubic ya	ards Ex	cavation Le	ength 30	Wi	dth20	Depth	fee
Soil Disposed _	0	cubic ya	ards O	ffsite Facility	<u> </u>	/a	Location	n	ı/a
FINAL ANALYT	ΓICAL RE	SULTS:	Samp	ole Date	5/20/2	005	Sample De	epth	12 ft
5-point composite s	sample of bot	tom and 4-							
sidewalls. TPH approved laborat	and chloride	laboratory	test results	completed b	by using an		CHLOR	RIDE FIELD T	ESTS
(2)(2)			A)				LOCATION	DEPTH (ft)	ppm
Sample	PID (field	i) <u>G</u>	RO	DRO	Chloride	2		7	264
Location	ppm	m	g/kg	mg/kg	mg/kg		cortical transk	8	116
4-WALL COMP.	3.7	<	10.0	<10.0	837		vertical trench at former	9	246
воттом сомр.	3.1		10.0	<10.0	1600		junction site	10	521
BACKFILL	18.7	7	.12	121	894			11	1121
							THE RESERVE OF THE PARTY OF THE	12	1377
General Description	of Remedial	Action:					4-wall comp.	n/a	602
-			This junction	n was eliminat	ed with		bottom comp.	12	1279
ne pipeline replacement	/upgrade progra	m. After the	box lumber w	as removed, th	he site was	1	backfill comp.	n/a	581
elineated using a backh	oe to collect so	samples at i	egular interva	als, producing	a 30 x 20 x 12-	-ft			
xcavation. Headspace	vapor was meas	ured using a	PID and all re	eadings were g	enerally low th	roughout.	Chloride field test	ts yielded conce	entrations
nat increased with depth	n. Confirmation	samples from	the final exc	avation were c	ollected for lab	oratory and	lysis. The excav	ated soil was bl	ended on site
nd then returned to the	hole to 6 ft BGS	where a 1-ft	thick clay bar	rrier was instal	led. The rema	inder of the	fill was returned	to the excavation	on on top of the
lay and contoured to the	e surrounding s	ırface. An ide	entification pla	ate was placed	on the surface	e to mark th	e location of the	former junction	and the
resence of clay below.	The disturbed s	urface was se	eded with a l	blend of native	vegetation on	9/7/2006 a	nd is expected to	return to produc	ctive capacity
t a normal rate. OCD v	vas notified of p	otential groun	dwater impac	t at this site on	2/26/2006.				
		ADDITIO	NAL EVA	LUATION	IS MEDIC	JM PRI	ORITY		
				enclosures:	photos, lab re	sults, PID f	eld screenings, c	hloride graph, e	xcavation profil
IHEREBY	CERTIFY TI	HAT THE IN		ON ABOVE WLEDGE AI			PLETE TO TH	HE BEST OF	MY
SITE SUPERVISOR _	Israel Juarez	: SIG	SNATURE/	Israel	Juarez	cc	MPANYRIC	E Operating Co	mpany
				1	8	3			
REPORT ASSEMBLED	BYK	ristin Farris P	ope	SIGNATUR	E_KA	ntin	Jan	12 100	2
DA	TE	2/26/2007		TITL	E		Project Scientis	st /	
* This site is a	"DISCLOSU	RE." It will	be placed	l on a priori	itized list o	similar .	sites for furth	er considera	ation.

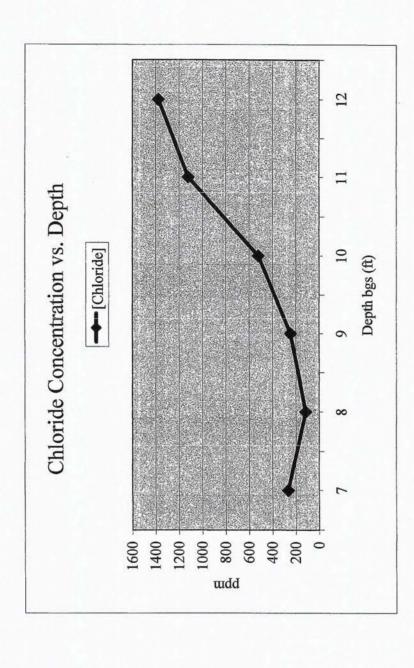
BD P-17 vent

unit P', Sec. 17, T21S, R37E

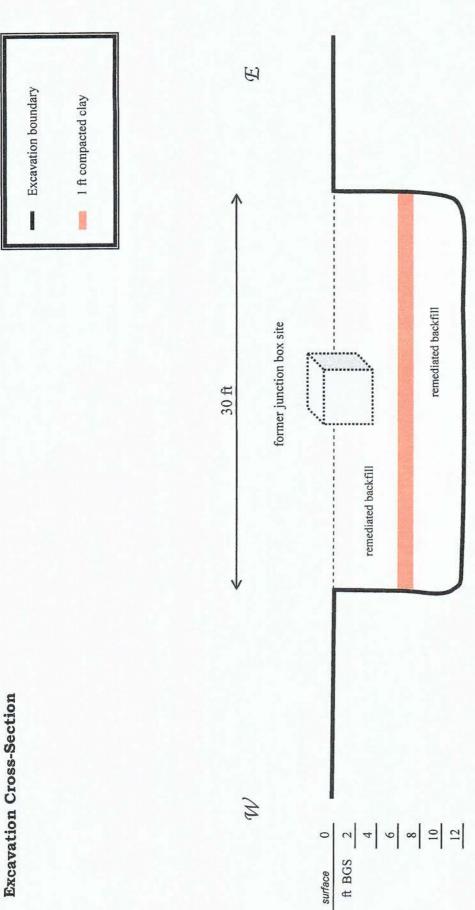
Vertical delineation at jct.

[CU] ppm	264	116	246	521	1121	1377
Depth bgs (ft)	7	«	6	10	11	12

Groundwater = 70 ft



BD P-17 vent 30 x 20 x 12-ft-deep



BD P-17 vent





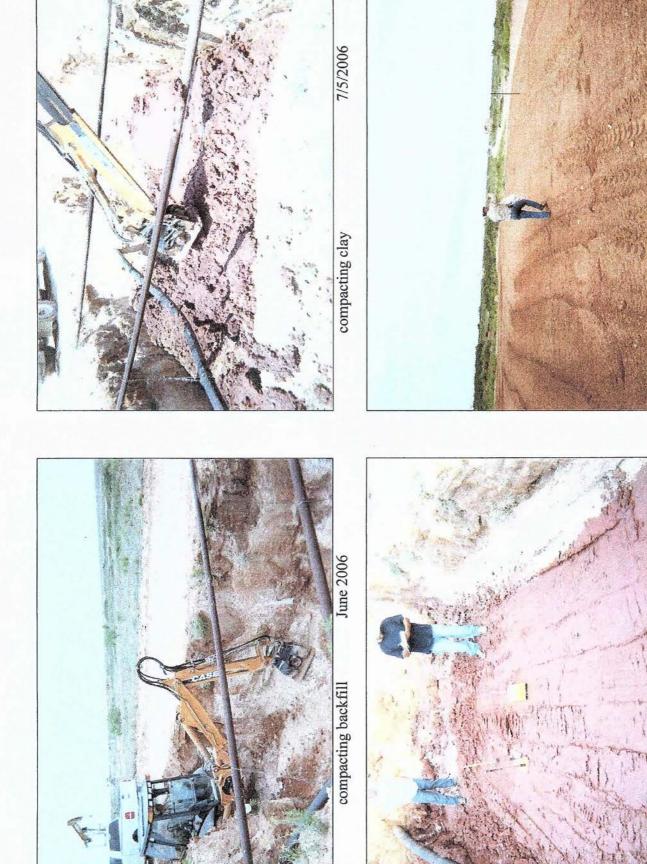






delineation & excavation

delineation & excavation



seeding disturbed surface at backfilled site

testing clay barrier at 6 ft



Analytical Report

Prepared for:

Roy Rascon Rice Operating Co. 122 W. Taylor Hobbs, NM 88240

Project: BD Vent P-17
Project Number: None Given
Location: None Given

Lab Order Number: 5E23003

Report Date: 05/26/05

Project: BD Vent P-17
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported: 05/26/05 14:33

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
BD Vent P-17 Bottom Comp. @12'	5E23003-01	Soil	05/20/05 09:35	05/20/05 18:00
4 Wall Comp	5E23003-02	Soil	05/20/05 10:18	05/20/05 18:00
Remediated Backfill	5E23003-03	Soil	05/20/05 10:42	05/20/05 18:00

Project: BD Vent P-17

Project Number: None Given Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported: 05/26/05 14:33

Organics by GC Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
BD Vent P-17 Bottom Comp. @12' (5E2	3003-01) Soil								
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EE52302	05/23/05	05/23/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	u	n				
Total Hydrocarbon C6-C35	ND	10.0	u	n	"		w		
Surrogate: 1-Chlorooctane		90.8 %	70-13	0	"	"	,	"	
Surrogate: 1-Chlorooctadecane		80.8 %	70-13	0	"	n		"	
4 Wall Comp (5E23003-02) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EE52302	05/23/05	05/23/05	EPA 8015M	- Anna
Diesel Range Organics >C12-C35	ND	10.0	"	11	ш	10		п	
Total Hydrocarbon C6-C35	ND	10.0	**	11	n	u =	11	"	
Surrogate: 1-Chlorooctane		77.2 %	70-13	0		"	"	"	
Surrogate: 1-Chlorooctadecane		74.0 %	70-13	0	"	"	"	"	
Remediated Backfill (5E23003-03) Soil									
Gasoline Range Organics C6-C12	J [7.12]	10.0	mg/kg dry	1	EE52302	05/23/05	05/23/05	EPA 8015M	J
Diesel Range Organics >C12-C35	121	10.0		и	n			9	
Total Hydrocarbon C6-C35	121	10.0		н	п	w	0		
Surrogate: 1-Chlorooctane		81.8 %	70-13	0	"	"	"	,	
Surrogate: I-Chlorooctadecane		78.0 %	70-13	0	"	"	"		

Project: BD Vent P-17

Project Number: None Given Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported: 05/26/05 14:33

General Chemistry Parameters by EPA / Standard Methods Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
BD Vent P-17 Bottom Comp. @12' (5E2300	03-01) Soil								
Chloride	1600	50.0	mg/kg	100	EE52411	05/23/05	05/23/05	EPA 300.0	
% Moisture	5.5	0.1	%	1	EE52311	05/24/05	05/24/05	% calculation	
4 Wall Comp (5E23003-02) Soil							110		
Chloride	837	25.0	mg/kg	50	EE52411	05/23/05	05/23/05	EPA 300.0	
% Moisture	3.3	0.1	%	1	EE52311	05/24/05	05/24/05	% calculation	
Remediated Backfill (5E23003-03) Soil									
Chloride	894	25.0	mg/kg	50	EE52411	05/23/05	05/23/05	EPA 300.0	
% Moisture	2.8	0.1	%	1	EE52311	05/24/05	05/24/05	% calculation	

Project: BD Vent P-17

Project Number: None Given Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported: 05/26/05 14:33

Organics by GC - Quality Control Environmental Lab of Texas

	D1	Reporting	**	Spike	Source	WDEC	%REC	DDD	RPD	Mate
Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Batch EE52302 - Solvent Extraction (GC)										
Blank (EE52302-BLK1)				Prepared &	Analyzed:	05/23/05				
Gasoline Range Organics C6-C12	ND	10.0	mg/kg wet							
Diesel Range Organics > C12-C35	ND	10.0								
Total Hydrocarbon C6-C35	ND	10.0								
Surrogate: I-Chlorooctane	42.9		mg/kg	50.0		85.8	70-130			
Surrogate: 1-Chlorooctadecane	36.9		"	50.0		73.8	70-130			
LCS (EE52302-BS1)				Prepared &	k Analyzed:	05/23/05				
Gasoline Range Organics C6-C12	460	10.0	mg/kg wet	500		92.0	75-125			
Diesel Range Organics >C12-C35	484	10.0	"	500		96.8	75-125			
Total Hydrocarbon C6-C35	944	10.0		1000		94.4	75-125			
Surrogate: 1-Chlorooctane	39.2		mg/kg	50.0		78.4	70-130		T	
Surrogate: 1-Chlorooctadecane	39.5		"	50.0		79.0	70-130			
Calibration Check (EE52302-CCV1)				Prepared &	& Analyzed	05/23/05				
Gasoline Range Organics C6-C12	463		mg/kg	500		92.6	80-120			
Diesel Range Organics >C12-C35	510			500		102	80-120			
Total Hydrocarbon C6-C35	973		"	1000		97.3	80-120			
Surrogate: 1-Chlorooctane	46.6		"	50.0		93.2	70-130			-
Surrogate: 1-Chlorooctadecane	38.4		"	50.0		76.8	70-130			
Matrix Spike (EE52302-MS1)	Sour	ce: 5E23003	3-01	Prepared &	& Analyzed	: 05/23/05				
Gasoline Range Organics C6-C12	490	10.0	mg/kg dry	529	ND	92.6	75-125			
Diesel Range Organics >C12-C35	546	10.0		529	ND	103	75-125			
Total Hydrocarbon C6-C35	1040	10.0		1060	ND	98.1	75-125			
Surrogate: 1-Chlorooctane	48.2		mg/kg	50.0		96.4	70-130			
Surrogate: 1-Chlorooctadecane	40.4		"	50.0		80.8	. 70-130			
Matrix Spike Dup (EE52302-MSD1)	Sour	ce: 5E23003	3-01	Prepared &	& Analyzed	: 05/23/05				
Gasoline Range Organics C6-C12	455	10.0	mg/kg dry	529	ND	86.0	75-125	7.41	20	
Diesel Range Organics >C12-C35	556	10.0	"	529	ND	105	75-125	1.81	20	
Total Hydrocarbon C6-C35	1010	10.0	"	1060	ND	95.3	75-125	2.93	20	
Surrogate: I-Chlorooctane	48.1		mg/kg	50.0		96.2	70-130			
Surrogate: 1-Chlorooctadecane	38.3		"	50.0		76.6	70-130			

Project: BD Vent P-17

Project Number: None Given Project Manager: Roy Rascon Fax: (505) 397-1471

Reported: 05/26/05 14:33

General Chemistry Parameters by EPA / Standard Methods - Quality Control Environmental Lab of Texas

% 2	200 000	Reporting	25252	Spike	Source	- Supplement	%REC	10000	RPD	287
Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Batch EE52311 - General Preparation (Prep)										
Blank (EE52311-BLK1)				Prepared 8	k Analyzed:	05/24/05				
% Moisture	ND	0.1	%							
Duplicate (EE52311-DUP1)	Sou	rce: 5E20009-	01	Prepared &	k Analyzed	05/24/05				
% Moisture	3.1	0.1	%		2.8			10.2	20	
Batch EE52411 - Water Extraction										
Blank (EE52411-BLK1)				Prepared &	k Analyzed	05/23/05				
Chloride	ND	0.500	mg/kg						i i	
LCS (EE52411-BS1)				Prepared &	& Analyzed	05/23/05				
Chloride	10.8		mg/L	10.0		108	80-120			
Calibration Check (EE52411-CCV1)				Prepared &	k Analyzed	: 05/23/05				
Chloride	11.0		mg/L	10.0		110	80-120			
Duplicate (EE52411-DUP1)	Sou	rce: 5E23003-	01	Prepared &	k Analyzed	: 05/23/05				
Chloride	1520	50.0	mg/kg		1600			5.13	20	

 Rice Operating Co.
 Project:
 BD Vent P-17
 Fax: (505) 397-1471

 122 W. Taylor
 Project Number:
 None Given
 Reported:

 Hobbs NM, 88240
 Project Manager:
 Roy Rascon
 05/26/05 14:33

Notes and Definitions

J Detected but below the Reporting Limit; therefore, result is an estimated concentration (CLP J-Flag).

DET Analyte DETECTED

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

dry Sample results reported on a dry weight basis

RPD Relative Percent Difference

LCS Laboratory Control Spike

MS Matrix Spike

	Kodane Kaline		
Report Approved By:	,	Date:	5/26/2005

Raland K. Tuttle, Lab Manager Celey D. Keene, Lab Director, Org. Tech Director

Duplicate

Dup

Jeanne Mc Murrey, Inorg. Tech Director James L. Hawkins, Chemist/Geologist Sandra Sanchez, Lab Tech.

This material is intended only for the use of the individual (s) or entity to whom it is addressed, and may contain information that is privileged and confidential.

If you have received this material in error, please notify us immediately at 432-563-1800.

Peggy Allen, QA Officer

Environmental Lab of Texas, Inc. 12800 West 1.20 East Phone: 915-563-1713

12600 West I.20 East Odessa, Texas 79763

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

Company Name Rice Operating Company Company Name Rice Oper										TAT brebnst2						\Box	1	Ţ	Ţ	7			ects	Ř		
### Rice Operating Company Name Rice Operating Company Name Rice Operating Company Name Rice Operating Company Name Rice Operating Company Name Rice Operating Company Name Rice Operating Company Name Rice Operating Company Name Rice Operating Company Name Name Name Rice Operating Company Name Ri						Bos	1	Millionbean	-	FUSH TAT (Pre-Schedule)	_					-	-	-	-	-			+ IS	000		
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anager: Roy Rascon y Name Rice Operating Company ddress: 122 W Taylor aterzip: Hobbs, NIM 88240 one No. 505-393-9174 mature: Language RDVent P.17 Bettern Comp 6.12 the redigted Rackfill Consoliated Rackfill Time Ly May Stables II.23					Fax No:					bəlqms2 əmiT		144	N									[F]	Brown	. 10	e ma	
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Environmental Lab of Texas Variance / Corrective Action Report – Sample Log-In

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Rice Operating Company

HOBBS, NEW MEXICO 88240 PHONE: (505) 393-9174 FAX: (505) 397-1471 VOC FIELD TEST REPORT FORM

MODEL NO: PGM 76IS CALIBRATION GAS

GAS COMPOSITION: ISOBUTYLENE AIR

LOT NO: <u>04-2747</u> EXP. DATE: <u>5-19-05</u> METER READING

ACCURACY: 100.2

SERIAL NO: 104412

100 PPM BALANCE

FILL DATE: 11-19-65 ACCURACY: ± 2%

SYSTEM	JUNCION	UNIT	SECTION	TOWNSHIP	RANGE
BD	Vent P-17	P	17	21	37

SAMPLE	PID RESULT	SAMPLE	PID RESULT
Bottown Comp @ 12'	3./		
5 West Wall Comp 5 North Wall Comp 5 East Wal Comp	3.2		
S North Wall Como	2.5		
5 Eastwal Comp	5.7		
5 South Wall Comp	3.3		
4 Wall Comm	3.7		
Remediated Backfill	18.7	32	
			
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I certify that I have calibrated the above instrument in accordance to the manufacture operation manual.

Signature : Israel huar;

Date <u>5/20/0</u>5

Current Photodocumentation

Basin Environmental Service Technologies (BEST)

P.O. Box 2948, Hobbs, NM 88241

Phone: 575-393-2967

BD P-17 Vent (1R426-132): UL/P, Sec. 17, T21S, R37E



Facing south 6-1-18



Facing east 6-1-18