



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

**May 17, 2018**

**Bradford Billings**

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

**RE: Corrective Action Plan (CAP) Report and Soil Closure Request  
Rice Operating Company – BD SWD System  
BD Jct. F-15 (1R426-255): UL/F, Sec. 15, T21S, R37E**

Mr. Billings:

RICE Operating Company (ROC) has retained Basin Environmental Service Technologies (Basin) 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.

**Background and Previous Work**

The site is located approximately 2.6 miles north of Eunice, New Mexico at UL/F, Sec. 15, T21S, R37E as shown on the Geographical Location Map and Area Map. An updated study of NM OSE records indicate that groundwater will likely be encountered at a depth of approximately 47 feet below ground surface (bgs).

In 2009, ROC initiated work on the former F-15 junction box. The site was delineated using a backhoe to form a 30 ft x 30 ft x 12 ft deep excavation and soil samples were screened at regular intervals for both hydrocarbons and chlorides. Representative composite samples were sent to a commercial laboratory for analysis of chloride and TPH. From the excavation, a 4-wall composite sample and a bottom composite sample were sent to a commercial laboratory for analysis. The 4-wall composite returned a chloride reading of 4,800 mg/kg, a Gasoline Range Organics (GRO) reading non-detect and a Diesel Range Organics (DRO) reading of 377 mg/kg. The bottom composite sample returned a chloride reading of 4,040 mg/kg, a GRO reading of 166 mg/kg and a DRO reading of 1,590 mg/kg. The sample was also analyzed for BTEX, resulting in benzene reading of non-detect, a toluene reading of 0.418 mg/kg, an ethylbenzene reading of 1.24 mg/kg and a total xylene reading of 4.67 mg/kg. The excavated soil was blended on site and a representative sample was sent to a commercial laboratory for analysis. The sample



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returned a chloride reading of 3,840 mg/kg, a GRO reading of 42.9 mg/kg and a DRO reading of 1,140 mg/kg. The sample was also analyzed for BTEX, resulting in a benzene and toluene reading of non-detect, an ethylbenzene reading of 0.056 mg/kg and a total xylenes reading of 0.434 mg/kg. The blended backfill was returned to the excavation up to 5 ft below ground surface. At 5 – 4 ft bgs, a 1 ft thick clay barrier was installed. The clay layer will provide a barrier that will inhibit the downward migration of chlorides to groundwater. Clean, imported soil was used to backfill the excavation to the ground surface and to contour to the surrounding area. An identification plate was placed on the surface above the former junction box to mark the presence of the clay below.

To further investigate the depth of chloride presence, a soil bore was installed on November 4<sup>th</sup>, 2009. The soil bore was installed at the former junction box site and was advanced to a depth of 36 ft bgs. Soil samples were collected every 3 ft and field titrated for chlorides and field screened for PIDs, resulting in concentrations that did not decrease with depth. The 24 ft, 33 ft, and 36 ft samples were sent to a commercial laboratory for analysis, resulting in a 24 ft chloride concentration of 736 mg/Kg, a GRO concentration of 1,720 mg/Kg, a DRO concentration of 7,340 mg/Kg, a benzene concentration of 0.541 mg/Kg, a toluene concentration of 1.45 mg/Kg, an ethylbenzene concentration of 2.81 mg/Kg and a total xylenes concentration of 11.2 mg/Kg. The 33 ft sample resulted in a chloride concentration of 1,760 mg/Kg, a GRO concentration of non-detect, a DRO concentration of 3,040 mg/Kg, a benzene concentration of 0.076 mg/Kg, a toluene concentration of 0.207 mg/Kg, an ethylbenzene concentration of 0.467 mg/Kg and a total xylenes concentration of 2.54 mg/Kg. The 36 ft sample resulted in a chloride concentration of 1,820 mg/Kg, a GRO concentration of 176 mg/Kg, a DRO concentration of 4,380 mg/Kg, a benzene concentration of non-detect, a toluene concentration of 0.113 mg/Kg, an ethylbenzene concentration of 0.538 mg/Kg and a total xylenes concentration of 2.51 mg/Kg. The entire borehole was plugged with bentonite to the ground surface. On November 24<sup>th</sup>, 2009, the site was seeded with a blend of native vegetation.

NMOCD was notified of potential groundwater impact on March 8<sup>th</sup>, 2010. A junction box disclosure report was submitted to NMOCD with all the 2009 junction box closures and disclosures

### **Investigation and Characterization Plan (ICP) Report**

An ICP was submitted on February 16<sup>th</sup>, 2015 and approved on February 20<sup>th</sup>, 2015. On May 19<sup>th</sup>, 2015, an additional 4 soil bores were installed at the site. As the bores were advanced, soil samples were taken at regular intervals and field tested for chlorides and hydrocarbons. Representative samples from each bore were taken to a commercial laboratory for confirmatory analysis. SB-2 returned a laboratory chloride reading of 1,010 mg/Kg at 22 ft bgs, which decreased to 208 mg/Kg at 31 ft bgs. SB-3 returned a laboratory chloride reading of 1,920 mg/kg at 16 ft bgs, which decreased to 784 mg/Kg at 40 ft bgs. SB-4 returned laboratory



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chloride readings of 1,300 mg/Kg at 19 ft bgs and decreased to 832 mg/Kg at 40 ft bgs. SB-5 returned a laboratory chloride reading of 992 mg/Kg at 19 ft bgs, which decreased to 448 mg/Kg at 40 ft bgs. On July 10<sup>th</sup>, 2015, an additional 2 soil bores were installed at the site SB-6 returned a laboratory chloride reading of 1,060 mg/Kg at 6 ft bgs, which decreased to 352 mg/Kg at 36 ft bgs. SB-7 returned a laboratory chloride reading of <16 mg/kg at the surface and 352 mg/Kg at 9 ft bgs. On June 15<sup>th</sup>, 2016, an additional soil bore was installed at the site. SB-8 returned a laboratory chloride reading of 752 mg/Kg at 3 ft bgs and 192 mg/Kg at 24 ft bgs. GRO and DRO readings at all depth in all bores were non-detect. The bore holes were plugged with bentonite to ground surface.

Basin analyzed historical photos to determine if there was any other indication of historical oilfield activity. Historical oilfield activity is clearly visible beginning in the 1955 historical photo, which appears to have caused a large disturbed area directly upgradient of our site.

#### **CAP Report and Soil Closure Request**

A Corrective Action Plan (CAP) was submitted on the August 31<sup>st</sup>, 2017 and the soil CAP approved by the NMOCD on the September 7<sup>th</sup>, 2017. The CAP proposed installing a 35 x 50 ft, 20-mil reinforced liner at 5-4 ft bgs.

In order to inhibit the downward migration of residual constituents through the vadose zone, ROC installed a 20-mil reinforced poly liner across the site with the dimensions of 35 x 50 ft, which covered the previously installed 30 x 30 ft clay liner. A total of 396 cubic yards of excavated soil were taken to a NMOCD approved facility for disposal. The bottom of the excavation was padded with 6 inches imported blow sand and a 20-mil reinforced liner was installed and properly seated at 4.5 ft bgs. The top of the liner was padded with 6 inches of imported blow sand, and the excavation was backfilled to ground surface with blended backfill soil and imported top soil. A sample of the blended backfill and a sample of the imported top soil were field tested for hydrocarbons using a PID, resulting in readings of 0.5 and 1.1 ppm, respectively. Each sample was sent to a commercial laboratory for analysis of chloride and returned a result of 16 mg/kg and <16 mg/kg, respectively. The backfilled site was then seeded with a blend of native vegetation. Vegetation above the liner will also provide a natural infiltration barrier for the site, since plants capture water through their roots thereby reducing the volume of water moving through the vadose zone. Documentation of this work is included in the Appendix.

#### **Groundwater Monitoring Plan**

In order to determine what affect the residual chlorides may have had on the groundwater quality below the site, BEST recommends that ROC install a near-source monitor well (MW-1) located approximately 25 feet down-gradient of the former junction box. To determine if there is an up-gradient source of contaminants coming onto the site, MW-2 will be installed approximately 70

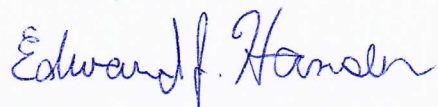
May 17, 2018

feet up-gradient of the former junction box. Also, an additional monitoring well (MW-3) will be installed approximately 100 feet down-gradient of the former junction box (see Proposed Monitoring Wells). Additional monitoring wells may be required to fully delineate groundwater quality. The monitor wells will be installed to NMOCD and EPA standards and then sampled quarterly. Once the monitor wells at the site have been analyzed to determine groundwater quality, ROC will either submit a groundwater remedy to NMOCD to address groundwater quality at the site or submit a termination request for site closure.

ROC has completed the vadose zone remediation as approved by NMOCD in the CAP. The 20-mil reinforced liner will inhibit the further migration of chlorides through the vadose zone in to groundwater. Therefore, ROC requests "Soil Closure" or similar closure status.

Basin appreciates the opportunity to work with you on this project. Please call Katie Jones Davis at (575) 393-9174 or me if you have any questions or wish to discuss the site.

Sincerely,



Edward J. Hansen  
Senior Hydrologist  
Basin Environmental Service Technologies

Attachments:

- Geographical Location Map
- Area Map
- Installed Liner Plat
- Proposed Monitoring Wells Plat
- Appendix – Liner Installation Documentation



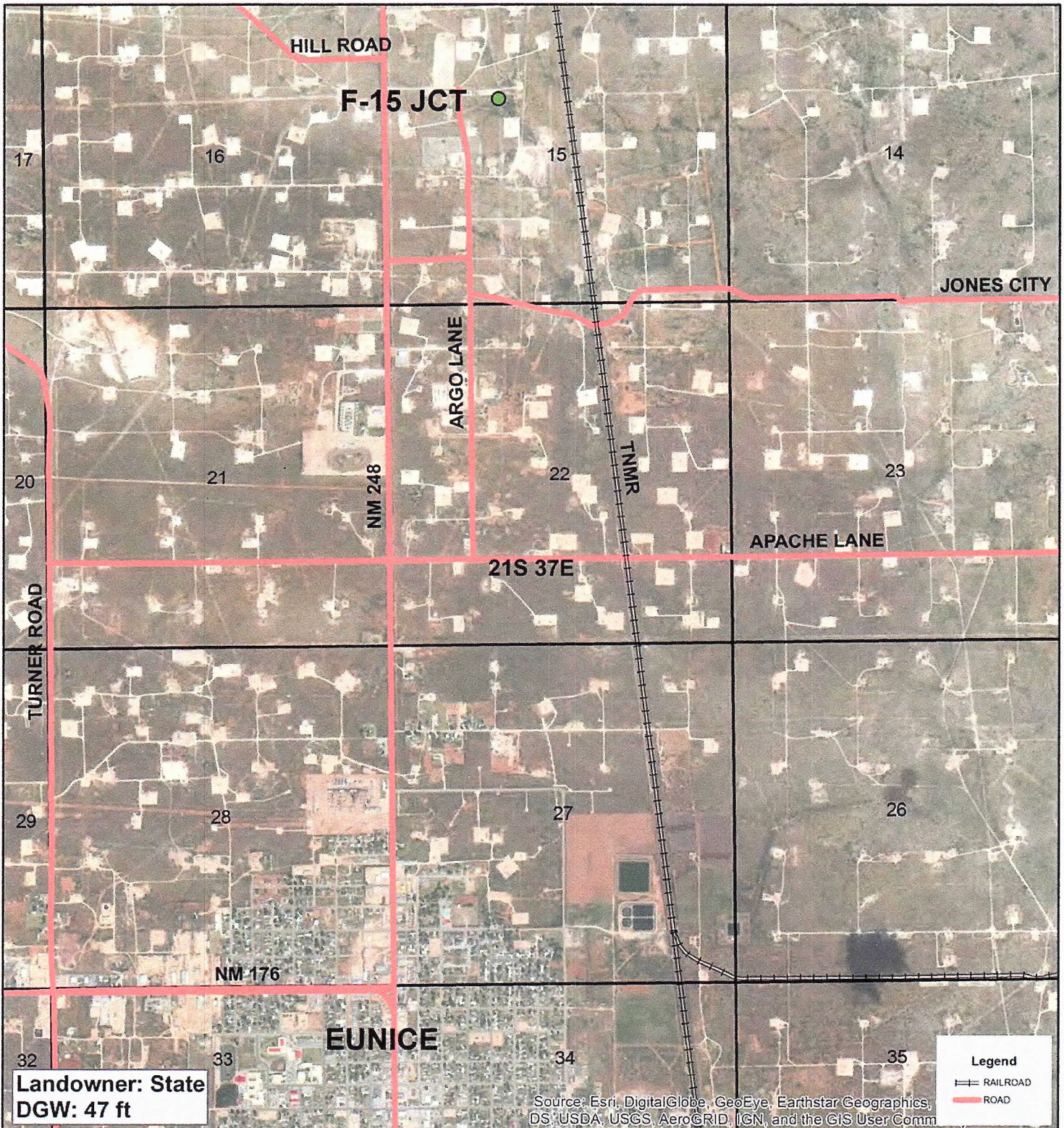


# Plats

**Basin Environmental Service Technologies**  
P.O. Box 2948, Hobbs, NM 88241  
Phone 575.393.2967



# Geographic Location



**Basin Environmental**  
Effective Solutions  
**Service Technologies**

**BD**  
**JCT F-15**  
1R426-255

UL F SECTION 15  
T-21-S R-37-E  
LEA COUNTY, NM

GPS: 32.480397 -103.153770



0 0.25 0.5  
Miles

Drawing date: 4/17/18  
Drafted by: T. Grieco



# Area Map



**Basin Environmental**  
Effective Solutions  
**Service Technologies**

**BD**  
**JCT F-15**  
1R426-255

UL F SECTION 15  
T-21-S R-37-E  
LEA COUNTY, NM

GPS: 32.480397 -103.153770

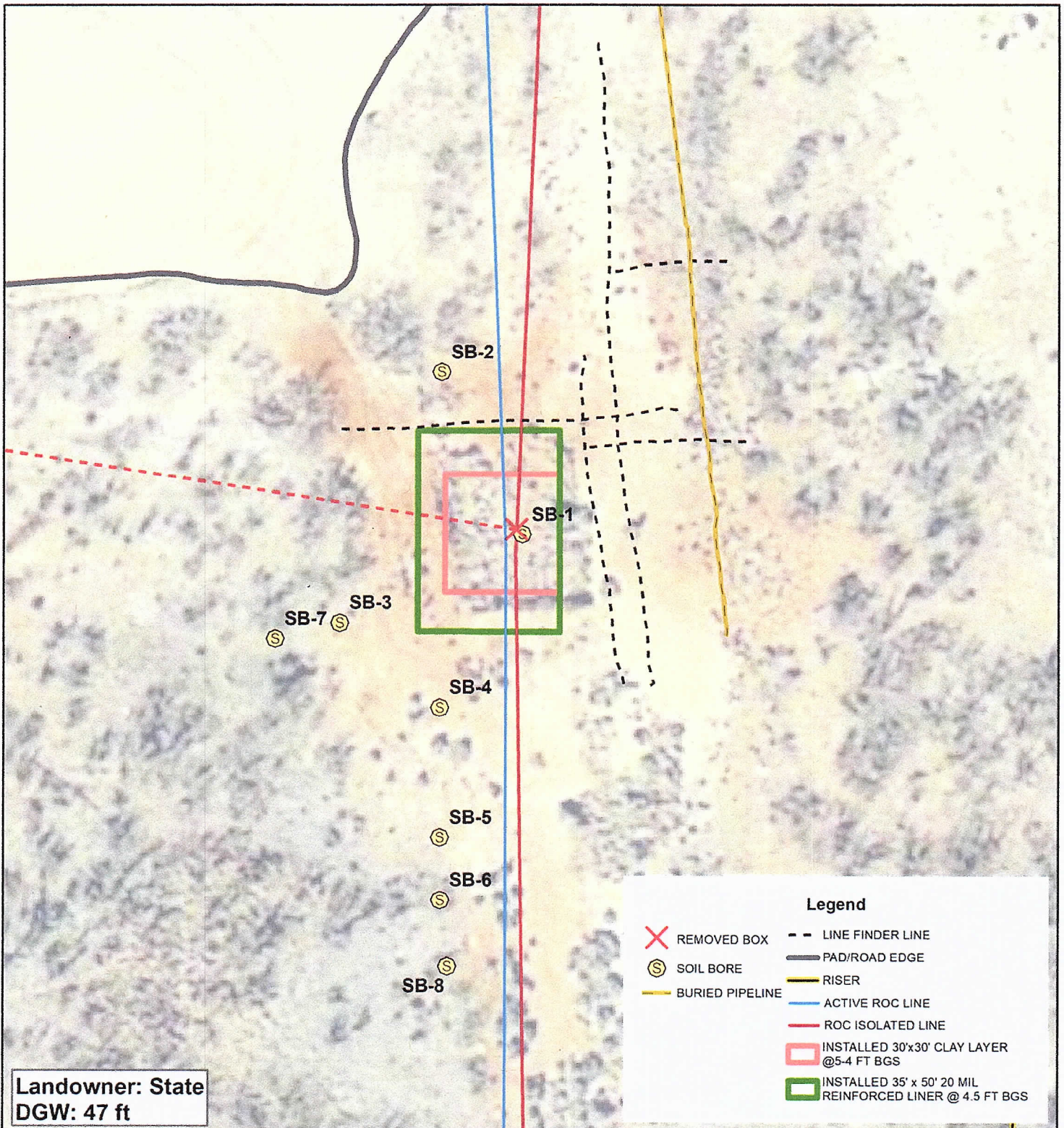


0 250 500  
Feet

Drawing date: 4/17/18  
Drafted by: T. Grieco



# Installed Liner



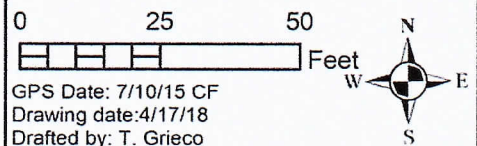
Landowner: State  
DGW: 47 ft

**Basin Environmental**  
Effective Solutions  
**Service Technologies**

**BD**  
**JCT F-15**  
1R426-255

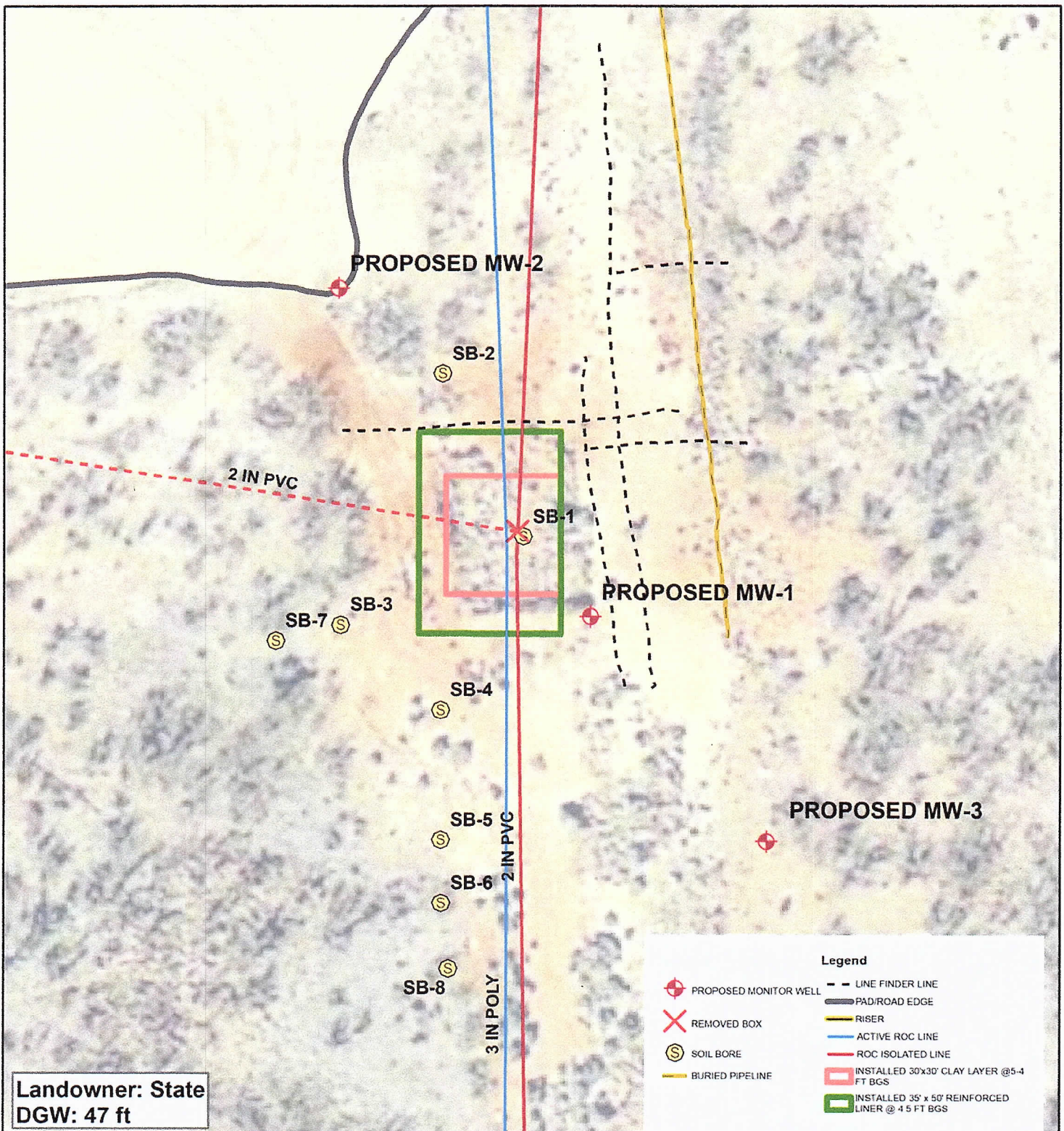
UL F SECTION 15  
T-21-S R-37-E  
LEA COUNTY, NM

GPS: 32.480397 -103.153770





## Proposed Monitor Wells



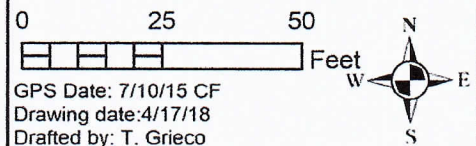
**Landowner: State**  
**DGW: 47 ft**



**BD**  
**JCT F-15**  
**1R426-255**

**UL F SECTION 15  
T-21-S R-37-E  
LEA COUNTY, NM**

**GPS: 32.480397 -103.153770**





# Appendix

**Basin Environmental Service Technologies**  
P.O. Box 2948, Hobbs, NM 88241  
Phone 575.393.2967



# BD Jct. F-15

Unit F, Sec. 15, T21S, R37E



Site prior, facing north

3/7/2017



Excavating the site to 5 ft bgs, facing north

10/23/2017



Excavation complete to a depth of 5-ft bgs and importing soil, facing northwest

10/30/2017



20-mil reinforced liner installed at 4.5 ft bgs, facing north

10/31/2017



Backfilling above the liner, facing southeast

11/1/2017



Site complete, facing north

2/8/2018



October 27, 2017

KATIE JONES

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: BD JCT F-15

Enclosed are the results of analyses for samples received by the laboratory on 10/23/17 16:36.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. 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/ga/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/ga/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 Operating Company  
KATIE JONES  
112 W. Taylor  
Hobbs NM, 88240  
Fax To: (575) 397-1471

Received: 10/23/2017  
Reported: 10/27/2017  
Project Name: BD JCT F-15  
Project Number: NONE GIVEN  
Project Location: 21-37

Sampling Date: 10/23/2017  
Sampling Type: Soil  
Sampling Condition: \*\* (See Notes)  
Sample Received By: Jodi Henson

**Sample ID: 8 PT. BLENDED BACKFILL COMP. (H702903-01)**

Chloride, SM4500Cl-B		mg/kg	Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	10/26/2017	ND	432	108	400	0.00	

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 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





Company Name: Nice Operating  
Project Manager: Katie Jones

[illegible][illegible]

Relinquished By: [Signature] Date: 10-23-17 Received By: [Signature]

Relinquished By: [Signature] Date: 11-30-17 Received By: [Signature]

PHONE # ( ) - - FAX # ( ) - -  
 NAME: \_\_\_\_\_  
 TITLE: \_\_\_\_\_  
 COMPANY: \_\_\_\_\_  
 ADDRESS: \_\_\_\_\_  
 CITY: \_\_\_\_\_ STATE: \_\_\_\_\_ ZIP: \_\_\_\_\_  
 COUNTRY: \_\_\_\_\_  
 E-MAIL: \_\_\_\_\_  
 ADD'L PHONE #1: \_\_\_\_\_  
 ADD'L PHONE #2: \_\_\_\_\_  
 ADD'L FAX #1: \_\_\_\_\_  
 ADD'L FAX #2: \_\_\_\_\_  
 REMARKS: \_\_\_\_\_

knorman@tasman-geo.com  
 tgreico@basinew.com  
 kjones@riceswd.com  
 klewis@tasman-geo.com

Delivered By: (Circle One) # 75 / 12.850 / 12.600

Sampler - UPS - Bus - Other:

Sample Condition

Cool ☐ Yes ☐ No

Intact ☐ Yes ☐ No

CHECKED BY: (Initials) *AK*

† Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326



# Tasman Geosciences, Inc.

2620 W Marland Hobbs, NM 88240

PHONE: (575) 318-5017

## PID METER CALIBRATION & FIELD REPORT FORM

CK.  
MODEL  
NO.

X

MODEL: PGM 7300	SERIAL NO: 590-000508
MODEL: PGM 7300	SERIAL NO: 590-000504
MODEL: PGM 7300	SERIAL NO: 590-902690
MODEL: PGM 7300	SERIAL NO: 590-000183

GAS COMPOSITION: ISOBUTYLENE 100 PPM / AIR: BALANCE

LOT NO: 544188 Cyl:167	EXPIRATION DATE: 9/2019
METER READING ACCURACY: 100 ppm	

ACCURACY : +/- 2%

<b>COMPANY</b>
RICE Operating Company

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
BD	Jct. F-15	F	15	21S	37E

SAMPLE ID	PID	SAMPLE ID	PID
8pt Blended Backfield Comp.	0.5		

I verify that I have calibrated the above instrument in accordance to the manufacture operation manual.

SIGNATURE: \_\_\_\_\_

*KL*

DATE: 10/23/2017



November 06, 2017

KATIE JONES

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: BD F-15

Enclosed are the results of analyses for samples received by the laboratory on 11/01/17 16:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. 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).

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Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

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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 Operating Company  
KATIE JONES  
112 W. Taylor  
Hobbs NM, 88240  
Fax To: (575) 397-1471

Received:	11/01/2017	Sampling Date:	11/01/2017
Reported:	11/06/2017	Sampling Type:	Soil
Project Name:	BD F-15	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	NOT GIVEN		

**Sample ID: IMPORTED TOP SOIL (H703011-01)**

Chloride, SM4500Cl-B		mg/kg	Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	11/03/2017	ND	432	108	400	0.00	

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 Samples reported on an as received basis (wet) unless otherwise noted on report

---

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager






Company Name: Rice Operating  
Project Manager: Katie Jones

[illegible][illegible]

**Relinquished By:**

Relinquished By: 

Date: 7-1-17  
 Time: 4:00  
 Received By: [Signature]  
 Date: \_\_\_\_\_  
 Time: \_\_\_\_\_  
 Received By: \_\_\_\_\_

ma eldady

Phone Result: ☐ Yes ☐ No Add'l Phone #:  
Fax Result: ☐ Yes ☐ No Add'l Fax #:  
REMARKS: *kjones@riceswd.com*

Delivered By: (Circle One)

27.7%

2562 27350

CHECKED BY: (Initials) *PO. #78*

klewis@tasman-geo.com  
tgrieco@basinenv.com



# Tasman Geosciences, Inc.

2620 W Marland Hobbs, NM 88240

PHONE: (575) 318-5017

## PID METER CALIBRATION & FIELD REPORT FORM

CK.  
MODEL  
NO.

X

MODEL: PGM 7300

SERIAL NO: 590-905146

MODEL: PGM 7300

SERIAL NO: 590-000504

MODEL: PGM 7300

SERIAL NO: 590-902690

MODEL: PGM 7300

SERIAL NO: 590-000183

GAS COMPOSITION: ISOBUTYLENE 100 PPM / AIR: BALANCE

LOT NO: 544188 Cyl:167	EXPIRATION DATE: 9/2019
METER READING ACCURACY: 100 ppm	

ACCURACY : +/- 2%

<b>COMPANY</b>
RICE Operating Company

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
BD	Jct. F-15	F	15	21S	37E

SAMPLE ID	PID	SAMPLE ID	PID
Imported Top Soil	1.1		

I verify that I have calibrated the above instrument in accordance to the manufacture operation manual.

SIGNATURE: \_\_\_\_\_

*KL*

DATE: 11/1/2017





112 West Taylor  
Hobbs, NM 88240  
Phone: (575) 393-9174  
Fax: (575) 397-1471

## VEGETATION FORM

### 1. General Information

Site name: BD Jet. F-15						
U/L F	Section 15	Township 21S	Range 37E	County Lea	Latitude 32.480397	Longitude -103.15377
Contact Name: Katie Jones Davis						
Email: kjones@riceswd.com						
Site size: 5,886 square feet						

### 2. Soils

*\*Do not rip caliche subsoils; caliche rocks brought to the surface by ripping shall be removed.*

Salvaged from site	<input type="checkbox"/>	Bioremediated	<input type="checkbox"/>	Imported	<input checked="" type="checkbox"/>	Blended	<input type="checkbox"/>	Depth (in)	<input type="text"/>
Texture: sandy		Describe soil & subsoil: top soil and blow sand							
Soil prep methods:		Rip	<input type="checkbox"/>	Depth (in)	<input type="text"/>	Disc	<input checked="" type="checkbox"/>	Depth (in)	3
Date completed:		11/2/2017							

### 3. Bioremediation

Fertilizer	<input type="checkbox"/>	Hay	<input type="checkbox"/>	Other	<input type="checkbox"/>
Type:	Describe:		Describe:		
Lbs/acre:					

### 4. Seeding

*\*Attach seed bag tags to this form. Seed bag tags shall contain the site name and S-T-R.*

Custom Seed Mix	<input checked="" type="checkbox"/>	Prescribed Mix	<input type="checkbox"/>	Seed Mix Name: 5 lbs Lea County Mix & 25 lbs Beardless Wheat Seed Mix	Date: 12/11/2017
Method: broadcast with seeder					
Soil conditions during seed:		Dry	<input checked="" type="checkbox"/>	Damp	<input type="checkbox"/>
Wet		<input type="checkbox"/>			
Observations: Seed was tilled into the soil					

### 5. Certification

I hereby certify that the information in this form and attachments is true and complete to the best of my knowledge and belief.

Name: Katie Jones Davis	Title: Environmental Manager	Date: 12/11/2017
Signature: <i>KJD</i>		