1R-425-37

WORKPLANS

Date: 7-29-13

Rice Environmental Consulting & Safety

P.O. Box 2948, Hobbs, NM 88241 Phone 575.393.2967

CERTIFIED MAIL RETURN RECEIPT NO. 7007 2560 0003 0320 5532 RECEIVED OCD 2013 JUL 31 P 2: 25

July 29th, 2013

Mr. Edward Hansen

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) Rice Operating Company – Vacuum SWD System Vacuum F-33 boot (1R425-37): UL/F sec. 33 T17S R35E

Mr. Hansen:

RICE Operating Company (ROC) has retained Rice Environmental Consulting and Safety (RECS) to address potential environmental concerns at the above-referenced site in the abandoned Vacuum Salt Water Disposal (SWD) system.

ROC is the service provider (agent) for the Vacuum 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 2.5 miles east of Buckeye, New Mexico at UL/F sec. 33 T17S R35E as shown on the Site Location Map (Figure 1). Monitor well sampling at the site indicates that groundwater is located at 82 ft bgs.

In 2007, ROC initiated work on the former Vacuum F-33 boot 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 (Figure 2). From the excavation, the four-wall composite, bottom composite and the backfill were taken to a commercial laboratory for analysis. Laboratory tests of the four-wall composite showed a chloride reading of 2,260 mg/kg, a gasoline range organics (GRO) readings of 67.3 mg/kg and a diesel range organics (DRO) reading of 1,180 mg/kg. The sample was also submitted for BTEX analysis which returned results of non-detect for benzene, 0.128 mg/kg for toluene, 0.624 mg/kg for ethyl-benzene and 1.85 mg/kg for total xylenes. The bottom composite showed a chloride laboratory reading of 6,800 mg/kg, a GRO reading of 127 mg/kg and a DRO reading of 1,710 mg/kg. BTEX readings returned results of 0.012 mg/kg for total xylenes. The excavated soil was

blended on site and returned to the excavation. A sample of the backfill was taken to a commercial laboratory for analysis and returned results of 3,600 mg/kg for chlorides, a GRO concentration below detectable limits and 1,700 mg/kg for DRO. The area was contoured to the surrounding landscape, and an identification plate was placed on the surface of the site to mark its location for future environmental considerations. NMOCD was notified of potential groundwater impact on November 20th, 2007 and a junction box disclosure report was submitted to NMOCD with all the 2007 junction box closures and disclosures.

An Investigation and Characterization Plan (ICP) was submitted to NMOCD on March 17th, 2008 and was approved on May 21st, 2008. As part of the ICP, three soil bores and a monitor well were installed at the site on February 3rd and 4th, 2009 (Figure 2). As the soil bores and monitor well were installed, sample were taken at regular intervals and field tested for chlorides and hydrocarbons. Representative samples were taken to a commercial laboratory for confirmatory chloride analysis (Appendix A). SB-1 and SB-2 were installed to 20 ft bgs. Laboratory analysis of SB-1 returned with a chloride value of 384 mg/kg at 5 ft bgs; however, field chloride levels dropped to a concentration of 222 mg/kg at 20 ft bgs. Laboratory analysis of SB-2 returned a chloride value of 1,860 mg/kg at 10 ft bgs; however, the chloride field values dropped as the bore was being advanced. SB-3, installed near the source, returned laboratory chloride readings of 4,400 mg/kg at 20 ft bgs and 5,760 mg/kg at 65 ft bgs. Field chloride levels remained high throughout the bore.

MW-1 was installed 35 feet down-gradient of the former junction box site. As the well was installed, field chloride levels dropped as the bore reached 60 ft bgs. Laboratory chloride readings showed chloride levels of 3,480 mg/kg at 25 ft bgs and 304 mg/kg at 60 ft bgs. The monitor well has been sampled quarterly since it has been installed (Figure 3). During the most recent sampling event on May 29th, 2013, MW-1 had a chloride reading of 860 mg/L and a TDS reading of 1,680 mg/L (Appendix B).

Corrective Action Plan

RECS recommends that ROC install a 20-mil reinforced poly liner measuring 62 ft x 61 ft at a depth of 3 ft bgs, due to the presence of hard rock in the area (Figure 2). The liner will provide a barrier that will inhibit the downward migration of chlorides to groundwater. The soils placed above the liner will have a laboratory chloride reading no greater than 500 mg/kg and a field PID reading below 100 ppm. Excavated soil will be evaluated for use as backfill and any soils requiring disposal will be properly disposed of at a NMOCD approved facility. Upon completion of backfilling, the site will be seeded with a native vegetative mix and soil amendments will be added as necessary. 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 to groundwater.

In order to determine if there is an up-gradient groundwater source for contamination at the site, RECS recommends that ROC install a monitor well (MW-2) approximately 100

ft up-gradient of the site (Figure 3). The monitor well will be sampled quarterly in conjunction with MW-1. Once the monitor wells at the site have been analyzed for chloride and TPH readings, ROC will submit a groundwater remedy to NMOCD to address groundwater quality at the site.

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,

ACW

Lara Weinheimer Project Scientist RECS (575) 441-0431

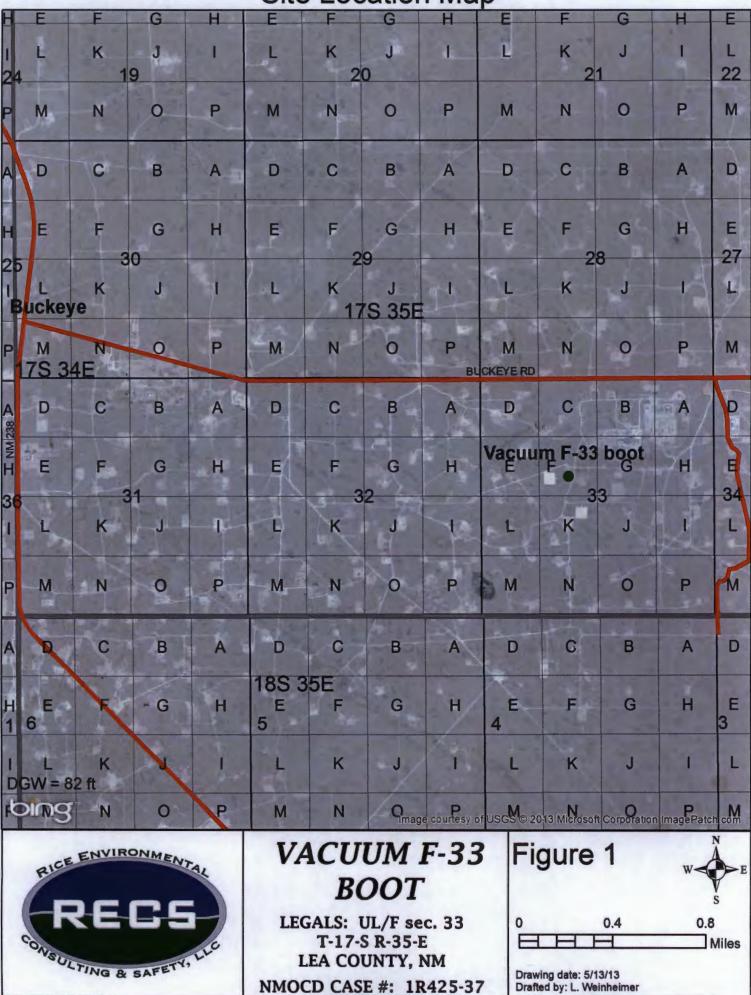
Attachments:

Figure 1 – Site Location Map Figure 2 – Soil Data Map Figure 3 – MW Sampling Map Appendix A – Soil Bore Installation Labs Appendix B – MW Sampling Lab

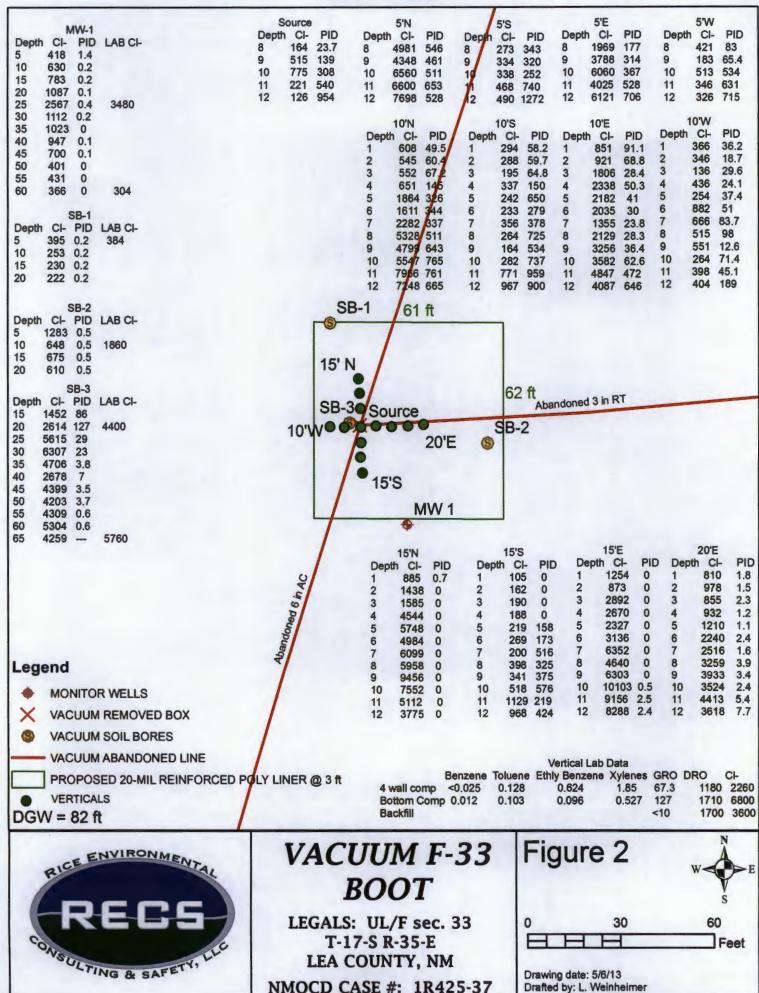
Figures

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

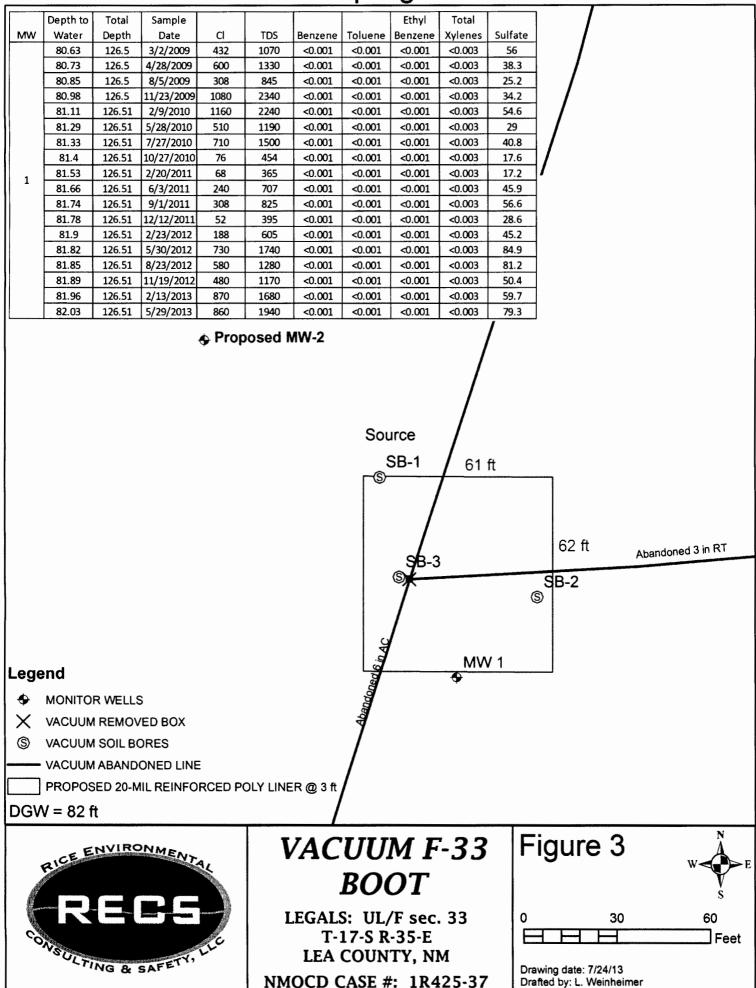
Site Location Map



Soil Data



MW Sampling Data



MW Sampling Data

	Depth to	Total	Sample					Ethyl	Total	-
MW	Water	Depth	Date	Cl	TDS	Benzene	Toluene	Benzene	Xylenes	Sulfate
	80.63	126.5	3/2/2009	432	1070	<0.001	<0.001	<0.001	<0.003	56
	80.73	126.5	4/28/2009	600	1330	<0.001	<0.001	<0.001	<0.003	38.3
	80.85	126.5	8/5/2009	308	845	<0.001	<0.001	<0.001	<0.003	25.2
	80.98	126.5	11/23/2009	1080	2340	<0.001	<0.001	<0.001	<0.003	34.2
	81.11	126.51	2/9/2010	1160	2240	<0.001	<0.001	<0.001	<0.003	54.6
	81.29	126.51	5/28/2010	510	1190	<0.001	<0.001	<0.001	<0.003	29
	81.33	126.51	7/27/2010	710	1500	<0.001	<0.001	<0.001	<0.003	40.8
	81.4	126.51	10/27/2010	76	454	<0.001	<0.001	<0.001	<0.003	17.6
1	81.53	126.51	2/20/2011	68	365	<0.001	<0.001	<0.001	<0.003	17.2
-	81.66	126.51	6/3/2011	240	707	<0.001	<0.001	<0.001	<0.003	45.9
	81.74	126.51	9/1/2011	308	825	<0.001	<0.001	<0.001	<0.003	56.6
	81.78	126.51	12/12/2011	52	395	<0.001	<0.001	<0.001	<0.003	28.6
	81.9	126.51	2/23/2012	188	605	<0.001	<0.001	<0.001	<0.003	45.2
	81.82	126.51	5/30/2012	730	1740	<0.001	<0.001	<0.001	<0.003	84.9
	81.85	126.51	8/23/2012	580	1280	<0.001	<0.001	<0.001	<0.003	81.2
	81.89	126.51	11/19/2012	480	1170	<0.001	<0.001	<0.001	<0.003	50.4
	81.96	126.51	2/13/2013	870	1680	<0.001	<0.001	<0.001	<0.003	59.7
	82.03	126.51	5/29/2013	860	1940	<0.001	<0.001	<0.001	<0.003	79.3

Proposed MW-2

Source SB-1

SB-3

61 ft

MW 1

62 ft

SB-2

S

Abandoned 3 in RT

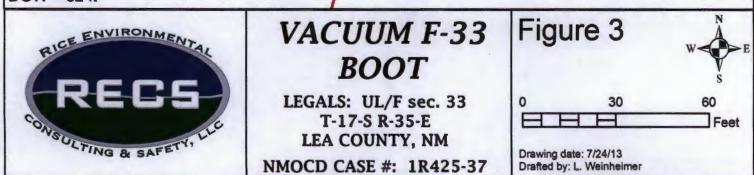


MONITOR WELLS

X VACUUM REMOVED BOX

- S VACUUM SOIL BORES
 - VACUUM ABANDONED LINE
- PROPOSED 20-MIL REINFORCED POLY LINER @ 3 ft

DGW = 82 ft



Appendix A Soil Bore Installation Labs

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



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ANALYTICAL RESULTS FOR RICE OPERATING COMPANY ATTN: HACK CONDER 122 WEST TAYLOR HOBBS, NM 88240 FAX TO: (575) 397-1471

Receiving Date: 02/05/09 Reporting Date: 02/06/09 Project Number: NOT GIVEN Project Name: VACUUM F-33 BOOT Project Location: VACUUM F-33 BOOT

Analysis Date: 02/06/09 Sampling Date: 02/03/09 & 02/04/09 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: ML Analyzed By: HM

		CI
LAB NO.	SAMPLE ID	(mg/kg)
H16836-1	SB #1 @ 5'	384
H16836-2	SB #2 @ 5'	1,860
H16836-3	SB #3 @ 20'	4,400
H16836-4	SB #3 @ 60'	5,760
H16836-5	MW-1 @ 25'	3,480
H16836-6	MW-1 @ 60'	304
Quality Control		490
True Value QC		500
% Recovery		98.0
Relative Percent	Difforanco	2.0

METHOD: Standard Methods 4500-CI'B Note: Analyses performed on 1:4 w:v aqueous extracts.

Many Chemist

O2/06/09 Date

H16836 RICE

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ANALYTICAL RESULTS FOR RICE OPERATING COMPANY ATTN: HACK CONDER 122 W. TAYLOR HOBBS, NM 88240 FAX TO: (575) 397-1471

Receiving Date: 02/05/09 Reporting Date: 02/10/09 Project Number: NOT GIVEN Project Name: VACCUM F-33 BOOT Project Location: VACCUM F-33 BOOT Sampling Date: 02/04/09 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: ML Analyzed By: ZL

LAB NUMBEF SA	AMPLE ID	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL BENZENE (mg/kg)	TOTAL XYLENES (mg/kg)
ANALYSIS DAT	E	02/09/09	02/09/09	02/09/09	02/09/09
H16836-3 SI	3 #3 @ 20'	<0.050	0.084	0.100	0.923
Quality Control		0.052	0.054	0.052	0.155
True Value QC		0.050	0.050	0.050	0.150
% Recovery		104	108	104	103
Relative Percent	Difference	3.5	1.8	<1.0	<1.0

METHOD: EPA SW-846 8021B

TEXAS NELAP CERTIFICATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE, AND TOTAL XYLENES.

hene Chemist

02/11/09

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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ARDINAL LABORATORIES

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(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325)673-7020

Company Name	e: Rice Operating Co	ompany								BILL TO ANALYSIS REQUEST																	
Project Manage	er: Hack Conder								P ./	0. #	k					Τ	Τ			I						\square	
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	MW-1 @ 25'		6	11		1	+-	+			1		2/4/09	10:25													
<u> </u>	MW-1 @ 60'		10	Ľ			+	+		\square	Y	-	2/4/09	10:37							 		<u> </u>			<u>├</u> ──	
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† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

NEED SAMPLES BACK, PLEASE

Appendix B

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



June 07, 2013

Hack Conder Rice Operating Company 112 W. Taylor

Hobbs, NM 88240

RE: VACUUM F-33 BOOT

Enclosed are the results of analyses for samples received by the laboratory on 06/03/13 16:41.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. 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.

Cardinal Laboratories is accreditated 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,

Celez D. Keine

Celey D. Keene Lab Director/Quality Manager



Analytical Results For:

Rice Operating Company Hack Conder 112 W. Taylor Hobbs NM, 88240 Fax To: (575) 397-1471

Received:	06/03/2013	Sampling Date:	05/29/2013
Reported:	06/07/2013	Sampling Type:	Water
Project Name:	VACUUM F-33 BOOT	Sampling Condition:	Cool & Intact
Project Number:	NOT GIVEN	Sample Received By:	Jodi Henson
Project Location:	T17S-R35E-SEC33 F - LEA CTY, NM		

Sample ID: MONITOR WELL #1 (H301296-01)

BTEX 8021B	mg/	L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	⊤rue Value QC	RPD	Qualifier
Benzene*	<0.001	0.001	06/05/2013	ND	0.053	106	0.0500	0.654	
Toluene*	06/05/2013	ND	0.048	95.3	0.0500	0.828			
Ethylbenzene*	<0.001	0.001	06/05/2013	ND	0.050	101	0.0500	0.903	
Total Xylenes*	<0.003	0.003	06/05/2013	ND	0.146	97.4	0.150	1.14	
Total BTEX	<0.006	0.006	06/05/2013	ND					
Surrogate: 4-Bromofluorobenzene (PIL	92.2 9	89.5-12	6						
Chloride, SM4500Cl-B	mg/	L	Analyze	d By: DW			- <u>.</u> .		
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride*	860	4.00	06/07/2013	ND	104	104	100	0.00	
Sulfate 375.4	mg/	L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Sulfate*	79.3	10.0	06/06/2013	ND	18.3	91.7	20.0	3.61	
TDS 160.1	mg/	L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
TDS*	1940	5.00	06/06/2013	ND	245	102	240	1.53	

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Kune

Celey D. Keene, Lab Director/Quality Manager

Page 2 of 4

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Notes and Definitions

**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500CI-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. Kune

Celey D. Keene, Lab Director/Quality Manager

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Hansen, Edward J., EMNRD

From:	Laura Pena <lpena@riceswd.com></lpena@riceswd.com>
Sent:	Wednesday, August 14, 2013 9:39 AM
То:	Hansen, Edward J., EMNRD
Cc:	Hack Conder; Katie Jones; Lara Weinheimer
Subject:	ROC - Vacuum F-33 boot (1R425-37) CAP Addendum
Attachments:	Vacuum F-33 boot Liner and SB Data.pdf

Mr. Hansen

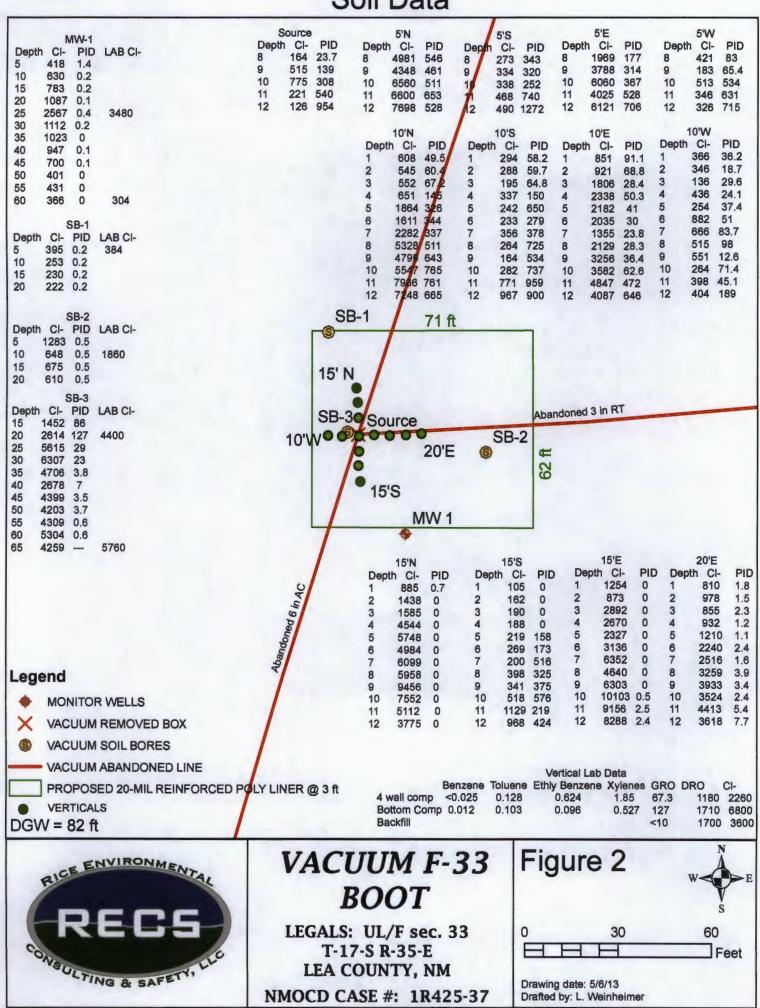
ROC submits the following as an Addendum to the Vacuum F-33 boot (1R425-37) CAP. Page 2, section Corrective Action Plan: text in blue lettering, below, will be added to the paragraph. Red lettering marked with a strike-through will be deleted. The new Figure 2 plat showing the updated proposed liner is attached.

RECS recommends that ROC install a 20-mil reinforced poly liner measuring 62 ft x 64 71 ft, extending 15 ft to the east past SB-2, at a depth of 3 ft bgs, due to the presence of hard rock in the area (Figure 2). The liner will provide a barrier that will inhibit the downward migration of chlorides to groundwater. The soils placed above the liner will have a laboratory chloride reading no greater than 500 mg/kg and a field PID reading below 100 ppm. Excavated soil will be evaluated for use as backfill and any soils requiring disposal will be properly disposed of at a NMOCD approved facility. Upon completion of backfilling, the site will be seeded with a native vegetative mix and soil amendments will be added as necessary. 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 to groundwater.

If you have any questions or require any additional information, please contact me or Hack Conder at (575)393-2967.

Thank you.

Laura Peña Environmental Project Assistant Manager RICE Operating Company



Soll Data