AP - 75

# STAGE 1 & 2 REPORTS

9-19-13

# Hansen, Edward J., EMNRD

From: Katie Jones <kjones@riceswd.com>

Sent: Thursday, September 19, 2013 4:07 PM

To: Hansen, Edward J., EMNRD
Cc: Hack Conder; Laura Pena

**Subject:** Further Delineation Required (AP-75) - ROC BD J-26 Site

Attachments: BD J-26 (AP-75) Soil Sample Plat.pdf; BD J-26 (AP-75) Lab Results.pdf

Mr. Hansen,

A hand auger was used to collect soil samples west of the BD J-26 (AP-75) site, specifically west of MW-2 and MW-4. Samples were collected to a depth of 4 ft bgs and sent to a commercial lab for chloride analysis, resulting in concentrations that increased with depth. The surface sample resulted in a chloride concentration below detectable limit and the 4 ft sample resulted in a concentration of 944 mg/kg. A plat showing the area and the laboratory results are attached. These elevated chloride concentrations in the soil and elevated groundwater chloride concentrations in the up-gradient well (MW-4) prove there is a non-ROC, up-gradient source contributing chlorides to the groundwater.

ROC acknowledges they have met the requirements of 19.15.30 NMAC, and respectfully request termination of the regulatory file or similar closure status. Upon NMOCD approval, the monitoring wells (MW-1, MW-2, MW-3, MW-4, and RW-1) will be plugged and abandoned using a cement grout containing 1-3% bentonite and a 3 ft cap of cement at the surface.

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

Thank you.

Katie Jones Environmental Project Manager RICE Operating Company

From: Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us]

**Sent:** Tuesday, August 27, 2013 4:22 PM

To: Hack Conder

Cc: Leking, Geoffrey R, EMNRD; Katie Jones; Laura Pena

Subject: Further Delineation Required (AP-75) - ROC BD J-26 Site

**RE:** Termination Request – Additional Information

for the Rice Operating Company's

BD J-26 Site

Unit Letter J, Section 26, T21S, R37E, NMPM, Lea County, New Mexico

Further Delineation Required (AP-75)

Dear Mr. Conder:

The New Mexico Oil Conservation Division (OCD) has received the Rice Operating Company's (ROC) Termination Request – Additional Information for the Abatement Plan (AP-75) for the BD J-26 Site, dated August 8, 2013. The above-referenced information, submitted in partial fulfillment of 19.15.30.19 NMAC (Part 30.19, formally, Rule 19.K), indicates that ROC has not met the requirements of

19.15.30.9 NMAC for this site. Therefore, the OCD hereby cannot approve the Request for above-referenced site:

ROC must further delineate for a possible chloride release near the site to the west. In addition, please submit a delineation report to the OCD within 180 days..

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact at 505-476-3489.

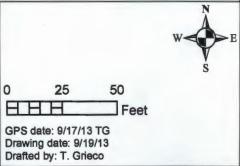
Edward J. Hansen Hydrologist Environmental Bureau





J-26
UL J SECTION 26
T-21-S R-37-E
LEA COUNTY, NM

NMOCD Case #: AP-75





September 17, 2013

Hack Conder

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: BD J-26

Enclosed are the results of analyses for samples received by the laboratory on 09/17/13 13:05.

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 <a href="https://www.tceq.texas.gov/field/qa/lab">www.tceq.texas.gov/field/qa/lab</a> 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.

Celey D. Keine

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 Hack Conder 112 W. Taylor Hobbs NM, 88240

Fax To:

(575) 397-1471

Received: Reported:

09/17/2013 09/17/2013

Project Name:

**BD J-26** Project Number: NONE GIVEN Project Location:

NOT GIVEN

Sampling Date:

09/16/2013

Sampling Type:

Sample Received By:

Sampling Condition:

Cool & Intact

Jodi Henson

Soil

## Sample ID: PT. 1 @ SURFACE (H302244-01)

Chloride, SM4500CI-B	mg	/kg	Analyze	d By: AP					
Analyte	Result Reporting Limit		Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	09/17/2013	ND	416	104	400	3.77	

### Sample ID: PT. 1 @ 1' (H302244-02)

Chloride, SM4500CI-B	/kg	Analyze	d By: AP						
Analyte	Result Reporting Limit		Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	09/17/2013	ND	416	104	400	3.77	

### Sample ID: PT. 1 @ 2' (H302244-03)

Chloride, SM4500CI-B	/kg	Analyze	d By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	384	16.0	09/17/2013	ND	416	104	400	3.77	

### Sample ID: PT. 1 @ 3' (H302244-04)

Chloride, SM4500CI-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	576	16.0	09/17/2013	ND	416	104	400	3.77	

\*=Accredited Analyte Cardinal Laboratories

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey 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:

09/17/2013

Reported: Project Name:

09/17/2013 BD J-26 NONE GIVEN Sampling Date:

09/16/2013

Sampling Type:

Soil Cool & Intact

Sampling Condition: Sample Received By:

Jodi Henson

Project Number: Project Location:

**NOT GIVEN** 

Sample ID: PT. 1 @ 4' (H302244-05)

Chloride, SM4500CI-B

mg/kg

Analyzed By: AP

Reporting Limit BS Analyte Result Analyzed Method Blank

Qualifier % Recovery RPD True Value QC Chloride 944 16.0 09/17/2013 ND 416 104 400 3.77

\*=Accredited Analyte Cardinal Laboratories

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Celey D. Keene

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. Keine



# CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603 (505) 393-2328 FAY (505) 393-2478 (325) 673-7001 FAX (325)673-7020

Company Name	ne: Rice						ANALYSIS REQUEST																		
Project Manager								P.O. #:																	
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Project Location	: BD J-26							Pho	ne i	#:				Chlorides	8015	$\mathbf{u}$	Texas TPH	Cations/Anions	TDS	3					
Sampler Name:	Kyk Norman							Fax						J 을	1 7	BTEX	X	Ö	F		1				
FOR LAB USE ONLY		T.			MA	TRIX	<b>(</b>		PRE	SER	V.	SAMPLI	NG	[ [	TPH		<u>@</u>	<b>a</b>		1					
Lab I.D. H <i>3</i> 02244	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE / COOL	OTHER:	DATE	TIME		<b>I</b>			Complete							
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<sup>†</sup> Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476