

1R - 427-361

WORKPLANS

Date:

6-20-13

Rice Environmental Consulting & Safety

P.O. Box 2948 Hobbs, NM 88241

Phone 575.393.2967

CERTIFIED MAIL

RETURN RECEIPT NO. 7008 1140 0001 3072 4628

RECEIVED

June 20th, 2013

JUN 21 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

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

RE: Investigation and Characterization Plan

Rice Operating Company – EME SWD System

EME H-24 EOL (1R427-361): UL/H sec. 24 T19S R36E

Formerly EME A-24 EOL

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 EME Salt Water Disposal (SWD) system. The site was previously referred to as the EME A-24 EOL. However, GIS mapping shows the site to be located within unit letter H (Figure 1). To reflect the geographical location of the site, the name has been changed to the EME H-24 EOL. All future correspondence will reference EME H-24 EOL.

ROC is the service provider (agent) for the EME 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 Investigation and Characterization Plan (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 Corrective Action Plan (CAP), if warranted.

3. Finally, after implementing the remedy, a Termination Request with final documentation will be submitted.

Background and Previous Work

The site is located approximately 2.5 miles northwest of Monument, New Mexico at UL/H sec. 24 T19S R36E as shown on the Site Location Map (Figure 2). An updated groundwater study of NM OSE records, conducted in 2013, indicate that groundwater will likely be encountered at a depth of approximately 95 +/- feet.

In 2011, ROC initiated work on the former EME H-24 EOL junction box. The site was delineated using a backhoe to form a 20 ft x 15 ft x 12 ft deep excavation and soil samples were screened at regular intervals for both hydrocarbons and chlorides. From the excavation, the four-wall composite, the bottom composite and the blended backfill were taken to a commercial laboratory for analysis. Laboratory tests of the four-wall composite showed a chloride reading of 656 mg/kg, a gasoline range organics (GRO) reading of 115 mg/kg and a diesel range organics (DRO) reading of 1,900 mg/kg. The bottom composite showed a chloride laboratory reading of 976 mg/kg, a GRO reading of non-detect and a DRO reading of 396 mg/kg. The blended backfill showed a chloride laboratory reading of 208 mg/kg, a GRO reading 98.2 mg/kg and a DRO reading of 1,200. Because the DRO reading on the blended backfill was above 1,000 mg/kg, the blended backfill was taken to a NMOCD approved facility for disposal.

The excavation was backfilled with clean, imported soil to 5 ft bgs. At 5-4 ft bgs, a 1 ft thick clay layer was installed and a compaction test was performed on April 7th, 2011. The excavation was then backfilled with clean, imported soil to ground surface and contoured to the surrounding location. The site was seeded with a blend of native vegetation on November 10th, 2011. NMOCD was notified of potential groundwater impact on April 9th, 2012 and a junction box disclosure report (Appendix A) was submitted to NMOCD with all the 2011 junction box closures and disclosures.

ROC proposes additional investigative work at the site to determine if there is potential for groundwater degradation from residual chlorides 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 (see Appendix B for Quality Procedures).
 - a. Vertical sampling will be conducted until 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 ≤ 250 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 ≤ 250 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 chlorides, 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.

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

Sincerely,



Lara Weinheimer
Project Scientist
RECS
(575) 441-0431

Attachments:

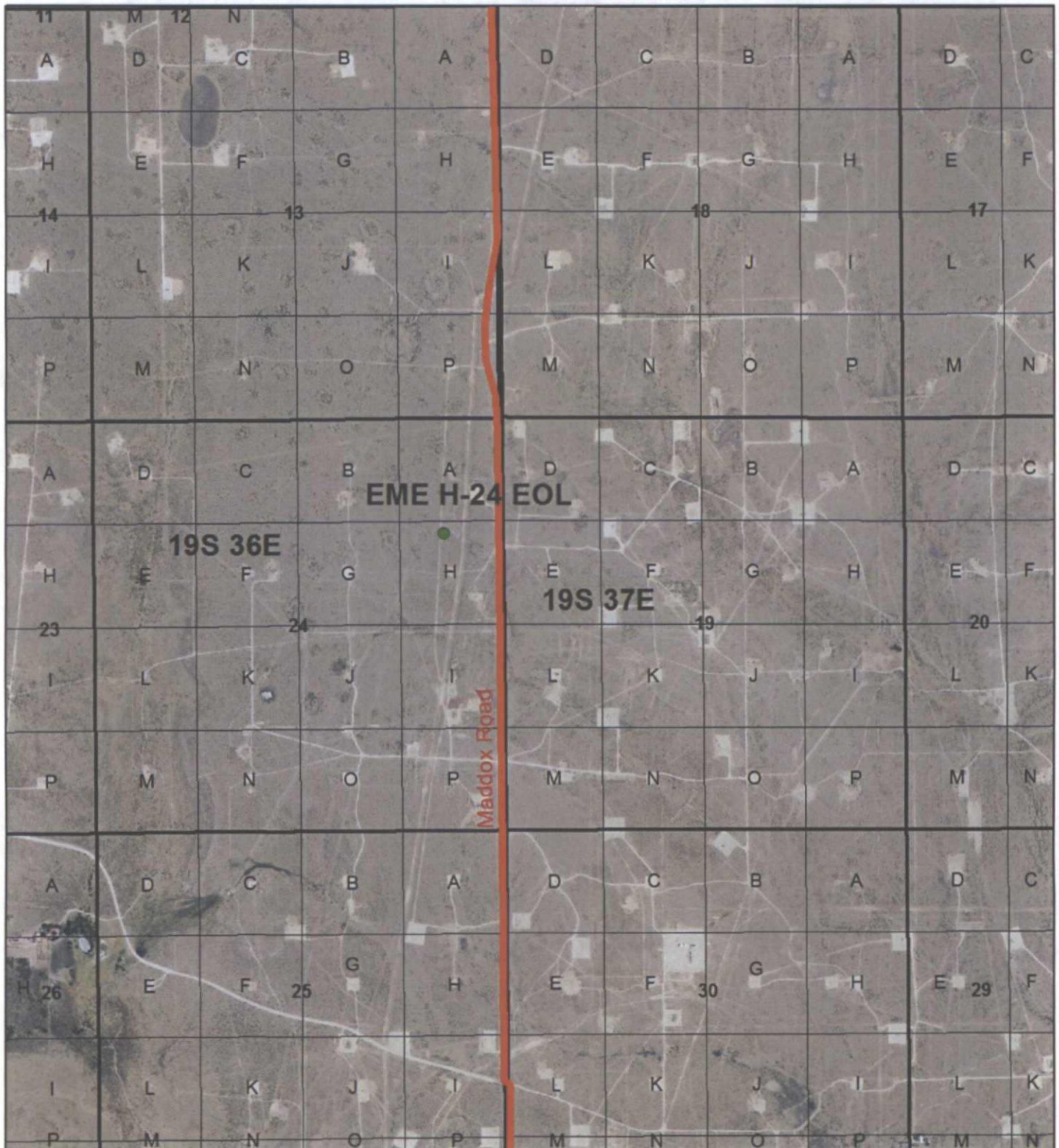
- Figure 1 – Geographical Location Map
- Figure 2 – Site Location Map
- Appendix A – Junction Box Disclosure Report
- Appendix B – Quality Procedures

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2013 JUN 24 P 2:49

Figures

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

Geographical Location Map



EME H-24 EOL

Legals: UL/H sec. 24
T-19-S R-36-E
LEA COUNTY, NM

NMOCD CASE #: 1R427-361

Figure 1



0 0.15 0.3 0.6
Miles

Drawing date: 2-27-13
Drafted by: LS

Site Location Map



EME H-24 EOL

Legals: UL/H sec. 24
T-19-S R-36-E
LEA COUNTY, NM

NMOCD CASE #: 1R427-361

Figure 2



0 0.225 0.45 0.9
Miles

Drawing date: 2-27-13
Drafted by: LS

Appendix A

Junction Box Disclosure Report

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

**RICE OPERATING COMPANY
JUNCTION BOX DISCLOSURE* REPORT**

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Eunice Monument Eumont (EME)	A-24 EOL	A	24	19S	36E	Lea	Length	Width	Depth
							Eliminated		

LAND TYPE: BLM _____ STATE X FEE LANDOWNER _____ OTHER _____

Depth to Groundwater 57 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 1/24/2011 Date Completed 4/7/2011 OCD Witness No

Soil Excavated 133.3 cubic yards Excavation Length 20 Width 15 Depth 12 feet

Soil Disposed 168 cubic yards Offsite Facility C & C Landfarm Location Monument, NM

FINAL ANALYTICAL RESULTS: Sample Date 3/8/2011 Sample Depth 12'

Procure 5-point composite sample of bottom and 4-point composite sample of sidewalls. TPH and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines:

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
BOTTOM COMP.	3.7	<10.0	396	976
4-WALL COMP.	54.9	115	1900	656
BLENDED BACKFILL	15.6	98.2	1200	208

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
bottom comp.	12'	671
4-wall comp.	N/A	613
blended backfill	N/A	184
background	6"	144
vertical delineation trench at 10' south of source	2'	151
	4'	149
	6'	625
	8'	288
	10'	662
	12'	1,019

General Description of Remedial Action: This junction and line were eliminated during

the pipeline replacement/upgrade program. After the former junction box was removed, an

investigation was conducted using a backhoe to collect soil samples at regular intervals

producing a 20x15x12-ft excavation. Chloride field tests performed on each sample yielded

elevated concentrations that increased with depth. Organic vapors were measured using a

PID which yielded relatively low concentrations. The excavated soil was blended on site, and

representative composite samples of the excavation bottom, the excavation walls, and the

blended backfill were sent to a commercial laboratory for analysis of chloride and TPH. The blended backfill was properly disposed of at a

NMOCD approved facility. The excavation was backfilled with clean imported soil to 5 ft below ground surface (BGS). At 5-4 ft BGS, a 1 ft thick

clay layer was installed with a compaction test performed on 4/7/2011. The excavation was then backfilled with clean imported soil to ground

surface and contoured to the surrounding area. On 11/10/2011, the site was seeded with a blend of native vegetation and is expected to return to

a productive capacity at a normal rate. NMOCD was notified of potential groundwater impact on 4/9/2012.

ADDITIONAL EVALUATION IS HIGH PRIORITY

enclosures: photos, lab results, PID (field) screenings, cross-section diagram, compaction test, proctor, hydraulic conductivity, chloride curve, revegetation form

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

SITE SUPERVISOR Oscar Frayre SIGNATURE _____

REPORT ASSEMBLED BY Amy C. Ruhl SIGNATURE _____

COMPANY RICE OPERATING COMPANY

PROJECT LEADER Zach Conder SIGNATURE _____

DATE 4-17-12

*This site is a "DISCLOSURE." It will be placed on a prioritized list of similar sites for further consideration.

EME A-24 EOL

Unit A, Section 24, T19S, R36E



Site prior to excavation, facing south 1.24.11



Collecting sample, facing south 1.24.11



Exporting soil, facing west 4.5.11



Backfilling site up to 5 ft BGS, facing northeast 4.7.11



Compaction test on clay liner, facing north 4.7.11



Seeding site, facing south 11.10.11



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

March 11, 2011

Bruce Baker
Rice Operating Company
112 W. Taylor
Hobbs, NM 88240.

RE: EME A-24 EOL (19/36)

Enclosed are the results of analyses for samples received by the laboratory on 03/08/11 16:20.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846.8021	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method SW-846.8260	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method TX.1005	Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

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 (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 cursive script that reads 'Celley D. Keene'.

Celley D. Keene
Lab Director/Quality Manager

COPY

Analytical Results For:

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

Received: 03/08/2011
Reported: 03/11/2011
Project Name: EME A-24 EOL (19/36)
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 03/08/2011
Sampling Type: Soil
Sampling Condition: ** (See Notes)
Sample Received By: Hope S. Moreno

Sample ID: 4-WALL COMP (H100455-01)

Chloride, SM4500Cl-B		mg/kg	Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	656	16.0	03/09/2011	ND	416	104	400	0.00	
TPH 8015M		mg/kg	Analyzed By: CK						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	115	50.0	03/10/2011	ND	170	85.2	200	0.285	
DRO >C10-C28	1900	50.0	03/10/2011	ND	173	86.4	200	3.27	
Surrogate: 1-Chlorooctane	123%	70-130							
Surrogate: 1-Chlorooctadecane	114%	70-130							

Sample ID: 5 PT BOTTOM COMP (H100455-02)

Chloride, SM4500Cl-B		mg/kg	Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	976	16.0	03/09/2011	ND	416	104	400	0.00	
TPH 8015M		mg/kg	Analyzed By: CK						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	03/10/2011	ND	170	85.2	200	0.285	
DRO >C10-C28	396	10.0	03/10/2011	ND	173	86.4	200	3.27	
Surrogate: 1-Chlorooctane	124%	70-130							
Surrogate: 1-Chlorooctadecane	117%	70-130							

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Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene
Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

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

Received:	03/08/2011	Sampling Date:	03/08/2011
Reported:	03/11/2011	Sampling Type:	Soil
Project Name:	EME A-24 EOL (19/36)	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Hope S. Moreno
Project Location:	NOT GIVEN		

Sample ID: BLENDED BACKFILL COMP (H100455-03)

Chloride, SM4500CI-B

mg/kg

Analyzed By: HM

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	208	16.0	03/09/2011	ND	416	104	400	0.00	

TPH 8015M

mg/kg

Analyzed By: CK

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	98.2	50.0	03/10/2011	ND	170	85.2	200	0.285	
DRO >C10-C28	1200	50.0	03/10/2011	ND	173	86.4	200	3.27	

Surrogate: 1-Chlorooctane 127% 70-130

Surrogate: 1-Chlorooctadecane 108% 70-130

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* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

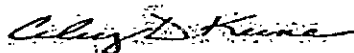
- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- ** Samples not received at proper temperature of 6°C or below.
- *** Insufficient time to reach temperature.
- Chloride by SM4500C-B does not require samples be received at or below 6°C
- Samples reported on 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



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240

(505) 393-2326; FAX (505) 393-2476

Company Name: <u>Rice</u>		BILL-TO:		ANALYSIS REQUEST																																		
Project Manager: <u>Hank Condon / Bruce Baker</u>		P.O. #:																																				
Address: <u>122 W. 1st Ave</u>		Company:																																				
City: <u>Hobbs, N.M. 88240</u> State: <u>N.M.</u> Zip: <u>88240</u>		Attn:																																				
Phone #: <u>505-9174</u> Fax #:		Address:																																				
Project #:		City:																																				
Project Name:		State: Zip:																																				
Project Location: <u>EME A-24 BOL 19-36</u>		Phone #:																																				
Sampler Name: <u>Open Fridge</u>		Fax #:																																				
FOR LAB USE ONLY																																						
Lab I.D.	Sample I.D.	GRAB OR (C) COMP.	# CONTAINERS													MATRIX				PRESERV.		SAMPLING		C.L. 1 TPH 8015 m														
																GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE/COOL													OTHER:	DATE	TIME
160455	4 WALL Comp	C	1															/				/															2-8-11	12:05
2	5 ft Bottom Comp	C	1															/				/															2-8-11	12:10
3	Blended Backfill Comp	C	1															/				/															3-8-11	11:59

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Relinquished By: <u>[Signature]</u>	Date: <u>3-8-11</u> Time: <u>4:20</u>	Received By: <u>[Signature]</u>	Phone Result: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #:
Relinquished By:	Date:	Received By:	Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Fax #:
Delivered By: (Circle One) Sampler - UPS - Bus - Other:			REMARKS: <u>HCondon@Rice-SWD.com K.Jones@Rice-SWD.com</u> <u>BBaker@Rice-els.com</u> <u>DFrayne@Rice-els.com</u> <u>2Condon@Rice-els.com</u>
Sample Condition Cool Integ: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		CHECKED BY: <u>[Signature]</u> (Initials):	

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

RICE OPERATING COMPANY

122 West Taylor Hobbs, NM 88240

PHONE: (575) 393-9174 FAX: (575) 397-1471

PID METER CALIBRATION & FIELD REPORT FORM

Check Model Number:

	Model: PGM 7300	Serial No: 590-000183		Model: PGM 7600	Serial No: 110-023920
	Model: PGM 7300	Serial No: 590-000508		Model: PGM 7600	Serial No: 110-013744
✓	Model: PGM 7300	Serial No: 590-000504		Model: PGM 7600	Serial No: 110-013676

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR; BALANCE

LOT NO: 930360	EXPIRATION DATE: 4-28-13
METER READING ACCURACY: 100.00	

ACCURACY : $\pm 2\%$

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	A-24EOL	A	24	19S	36E

[illegible]

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

SIGNATURE:

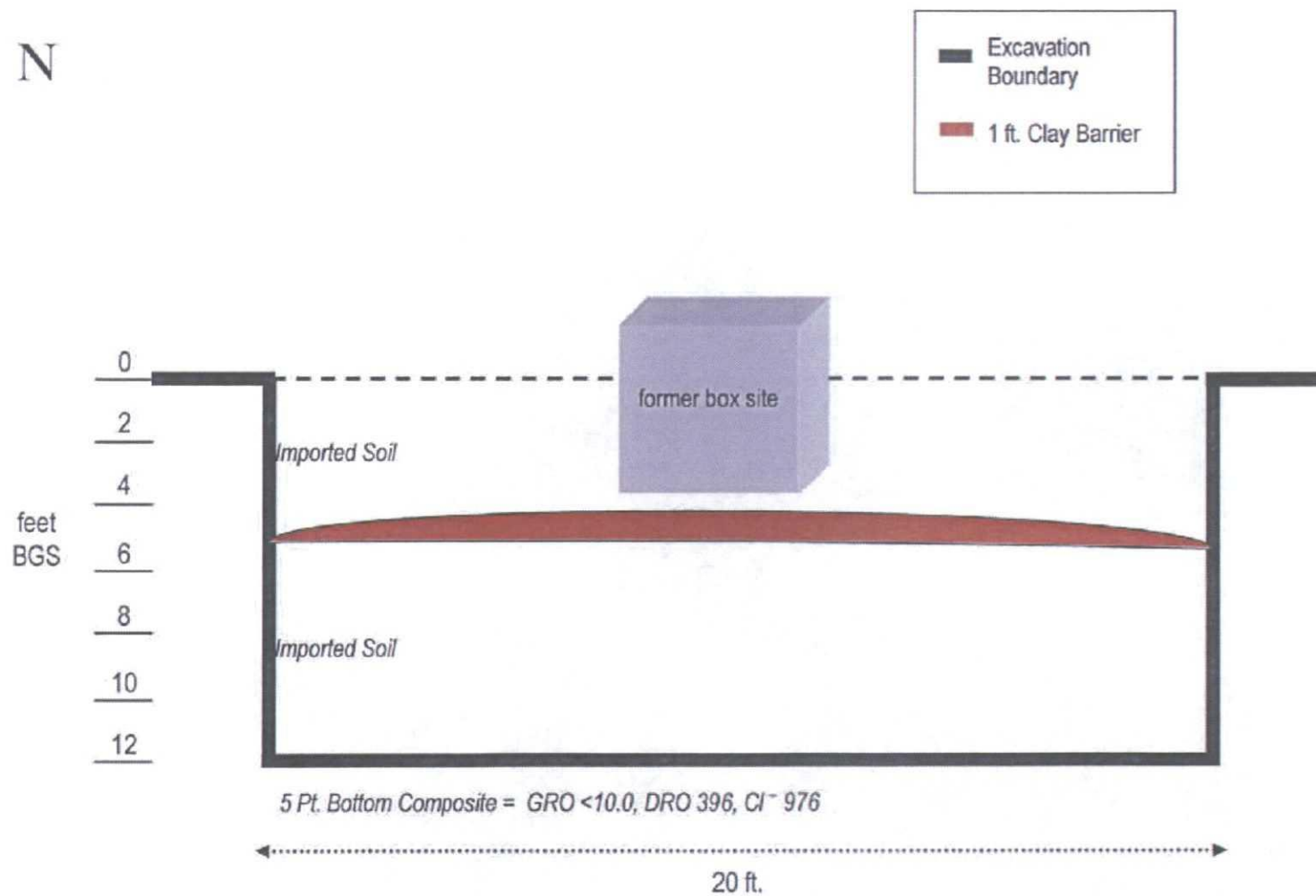
DATE: 3-8-11

EME A-24 EOL
Unit 'A', Sec. 24, T19S, R36E

Excavation Cross-Section

N

S





LABORATORY TEST REPORT
PETTIGREW & ASSOCIATES, P.A.

1110 N. GRIMES
HOBBS, NM 88240
(575) 393-9827



DEBRA P. HICKS, P.E./L.S.I.
WILLIAM M. HICKS, III, P.E./P.S.

To: Rice Operating Company
122 W. Taylor
Hobbs, NM 88240

Material: Cooper Red Clay

Project: A24 EOL
Project No. 2011.1191

Test Method: ASTM: D 2922

Date of Test: April 7, 2011

Depth: See Below

Depth of Probe: 12"

Test No.	Location	Dry Density	% Moisture	Depth
		% Max		
SG 1	A24 EOL Center of Pit	90.9	13.1	4' Below FSG

Control Density: 102.6
ASTM: D 698

Optimum Moisture: 20.7%

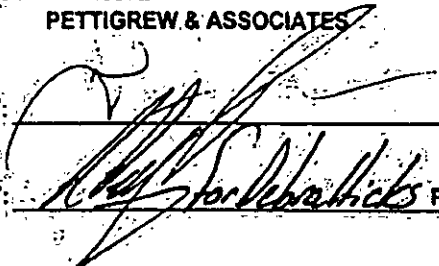
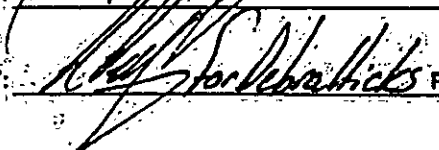
Required Compaction: 90-95%

Densometer ID: 5572

Lab No.: 11 3436-3437

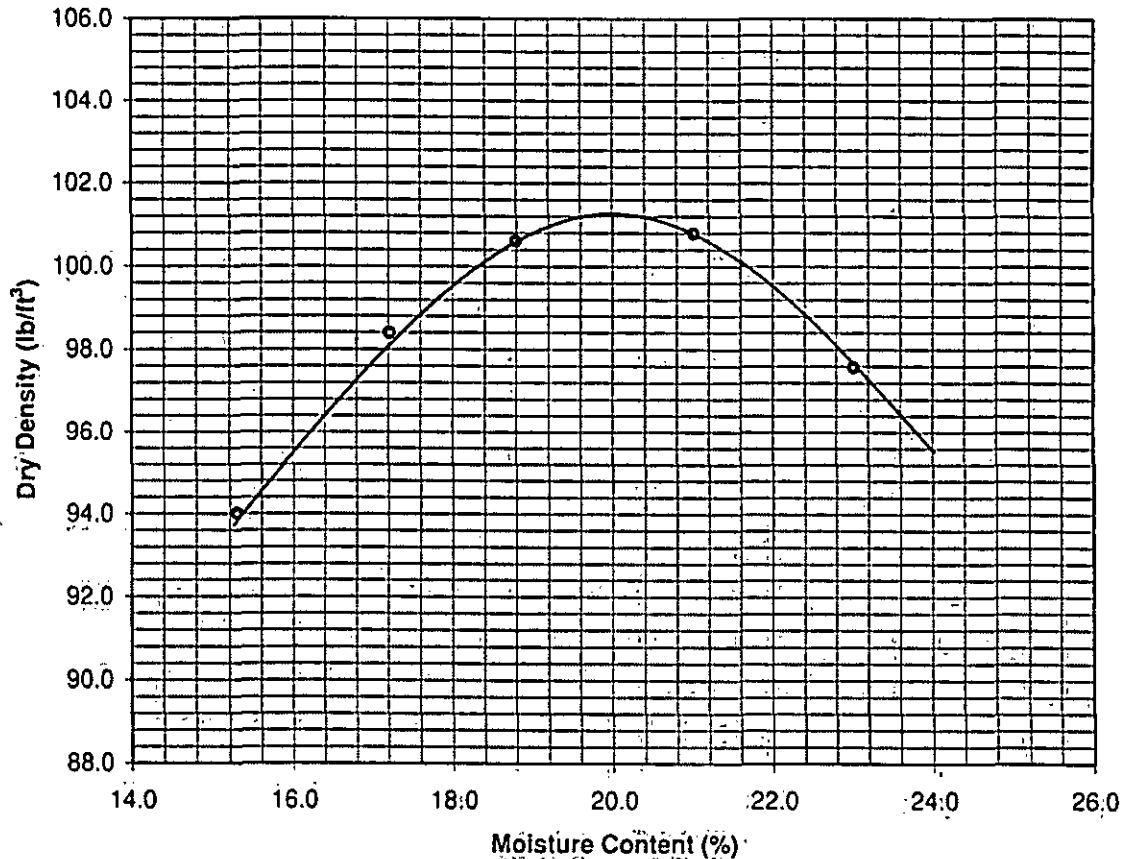
PETTIGREW & ASSOCIATES

Copies To: Rice Operating

BY: 
BY:  P.E.



PETTIGREW & ASSOCIATES, P.A.
1110 N. GRIMES ST.
HOBBS, NM 88240
(575) 393-9827



General Information
CLIENT: Rice Operating PROJECT: Project No. 2011.1006
SAMPLE LOCATION: Wallach Pit
SOIL DESCRIPTION: Wallach Red Clay
SOIL CLASSIFICATION: _____ TEST METHOD: ASTM: D.698
ATTERBERG: LL _____ PI _____ Sampled & Delivered: 7/6/11
REQUIRED: _____
DATE: 7/12/11 LAB NO. 11 6628-6629
DRY WEIGHT LB/CU. FT.: 101.2 MOISTURE CONTENT %: 20.0

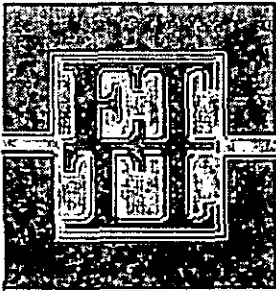
SIEVE ANALYSIS - % PASSING										
3"	2"	1"	3/4"	1/2"	3/8"	#4	#10	#40	#80	#200

PETTIGREW & ASSOCIATES

COPIES: Rice Operating

BY: _____

BY: _____ P.E.



RECEIVED

AUG 12 2011

RICE OPERATING
HOBBS, NM

210 Beech Street
707 West Cotton St.

Home Office - 1717 East Erwin Street

Tyler, Texas 75702-6398

Office: (903) 595-4421 Lab: (903) 595-6402 Fax: (903) 595-6113

Area Offices

Texarkana, AR 71854

(870) 772-0013

Longview, TX 75604

(903) 758-0402

Acct ID: PETTIGREW
Report Date: 08/01/2011
Project: Pettigrew & Associates General File 2011, Hobbs, NM
Location: Job: Rice Operating
Client: Pettigrew & Associates, Hobbs, NM
Contractor: Not Given

File ID: C4965-111

Date Sampled: 07/20/2011
Sampled By: Client
By Order Of: Erica Hart
Order Number:

REPORT: FLEXIBLE WALL PERMEAMETER

LAB NO: 10378 A

Test Method: See Below

TEST RESULTS

Report No: 1-1355-000009

Page 1 of 2

HYDRAULIC CONDUCTIVITY DETERMINATION FLEXIBLE WALL PERMEAMETER - CONSTANT VOLUME (Mercury Permeometer Test)

Project: Pettigrew & Associates, Hobbs, NM, Job: Rice Operating

Date: 7/27/2011

Panel Number:

P1: ASTM D 5084

Project No.: C 4965-111

Permeometer Data

Boring No.:	ap =	0.031416 cm ²	Soil Mercury to Plat Resist	Equilibrium	1.7	cm ³
Sample: 10378 A Lab Molded	aa =	0.767120 cm ²		Pipel Rp	6.7	cm ³
Depth (ft):	M1 =	0.030180	C =	Annulus Re.	1.5	cm ³
Other Location: On Site	M2 =	1.040953	T =			

Material Description: Cooper Red Clay, Molded at about 95% D 698

SAMPLE DATA

Wet Wt. sample + ring or tare:	539.49	g	Before Test		After Test	
Tare or ring Wt.:	0.0	g	Tare No.:	A 1	Tare No.:	T 10
Wet Wt. of Sample:	539.49	g	Wet Wt. + tare:	884.84	Wet Wt. + tare:	770.82
Diameter:	2.77	in	Dry Wt. + tare:	744.29	Dry Wt. + tare:	660.68
Length:	2.79	in	Tare Wt.:	147.75	Tare Wt.:	221.09
Area:	6.02	in ²	Dry Wt.:	596.54	Dry Wt.:	439.59
Volume:	16.81	in ³	Water Wt.:	140.55	Water Wt.:	110.14
Unit Wt. (wet):	122.18	pcf	% moist.:	23.6	% moist.:	25.1
Unit Wt. (dry):	98.88	pcf				

Assumed Specific Gravity:	2.70	Max Dry Density (pcf) =	103.8	OMC =	20.8
		% of max. =	95.4	+/- OMC =	2.76
Calculated % saturation:	96.00	Void ratio (e) =	0.70	Porosity (n) =	0.41

Charge: Pettigrew & Associates Attn: Jessica Buendia
Orig: Pettigrew & Associates, Hobbs, NM Attn: Jessica Buendia
1-cc Pettigrew & Associates, Hobbs, NM Attn: Erica Hart
1-cc Pettigrew & Associates, Hobbs, NM Attn: Jessica Buendia
E-Mail: jbuendia@pettigrew.us
1-cc Pettigrew & Associates, Hobbs, NM Attn: Erica Hart
E-Mail: ehart@pettigrew.us

THIS REPORT APPLIES ONLY TO THE STANDARDS OR PROCEDURES INDICATED AND TO THE SAMPLE(S) TESTED AND/OR OBSERVED AND ARE NOT NECESSARILY INDICATIVE OF THE QUALITIES OF APPARENTLY IDENTICAL OR SIMILAR PRODUCTS OR PROCEDURES, NOR DO THEY REPRESENT AN ONGOING QUALITY ASSURANCE PROGRAM UNLESS SO NOTED. THESE REPORTS ARE FOR THE EXCLUSIVE USE OF THE ADDRESSED CLIENT AND ARE NOT TO BE REPRODUCED WITHOUT WRITTEN PERMISSION.

REPORT CREATED BY ElmTree SYSTEM

CHLORIDE CONCENTRATION CURVE

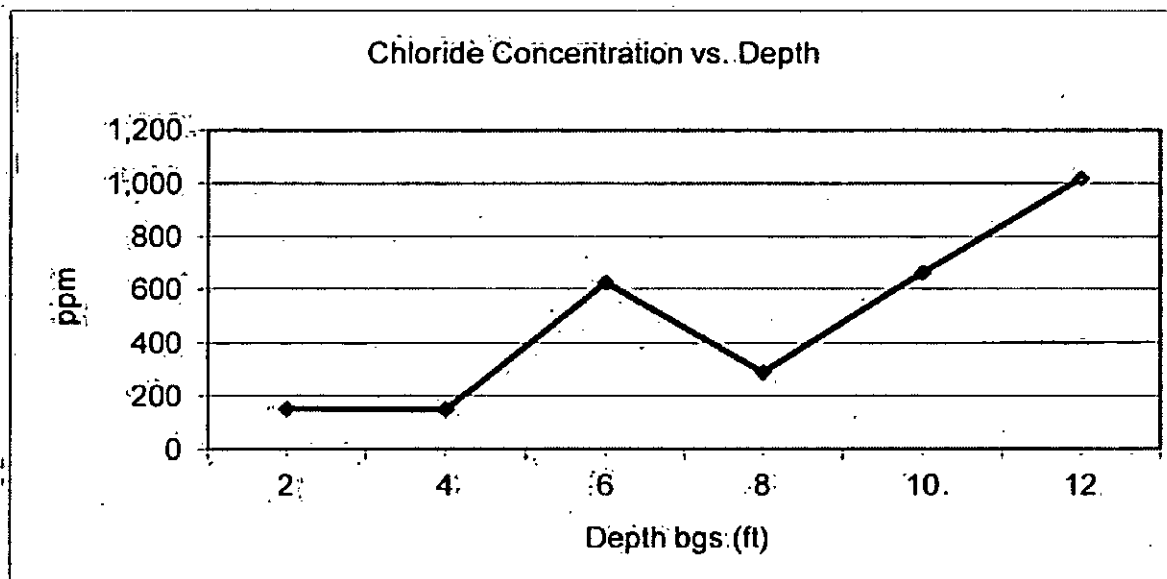
RICE Operating Company

EME A-24 EOL

Unit 'A', Sec. 24, T19S, R36E

Backhoe samples at 10 ft South of the junction. (source)

Depth bgs (ft)	[Cl ⁻] ppm
2	151
4	149
6	625
8	288
10	662
12	1,019



Groundwater = 57 ft



PO Box 5630
Hobbs, NM 88241
Phone: (575) 393-4411
Fax: (575) 393-0293

VEGETATION FORM

1. General Information

Site name: EME						
A-24 EOL						
U/L A	Section 24	Township 19S	Range 36E	County Lea	Latitude N-32°38'58.15"	Longitude W-103°18'5.32"
Contact Name: Bruce Baker						
Email: bbaker@rice-ecs.com						
Site size: 5,600		square feet		Map detail of site attached <input type="checkbox"/>		
Additional information:						

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):
Texture: Sandy		Describe soil & subsoil: Blow sand and subsoil caliche		
Soil prep methods: Rip <input type="checkbox"/>	Depth (in):	Disc <input type="checkbox"/>	Depth (in):	Rollerpack <input type="checkbox"/>
Date completed: 4-7-11				

3. Bioremediation

Fertilizer <input type="checkbox"/>	Hay <input type="checkbox"/>	Other <input type="checkbox"/>
Type:	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:	Seeding date: 11-10-11
Broadcast <input checked="" type="checkbox"/> 3LBS BLUE GRAMA 2.5 LBS BLUE GRAMA			
Method: Portable seeder			
Soil conditions during seeding: Dry <input checked="" type="checkbox"/> Damp <input type="checkbox"/> Wet <input type="checkbox"/>			
Photos attached <input type="checkbox"/>	Observations:		
Number of photos:			

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: OSCAR FRAYRE	Title: Environmental Tech.	Date: 11/10/11
Signature:		

COPY

Appendix B

Quality Procedures

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

Rice Environmental Consulting and Safety

Quality Procedures

Table of Contents

- QP-1 Soil Samples for Transportation to a Laboratory
- QP-2 Chloride Titration Using 0.282 Normal Silver Nitrate Solution
- QP-3 Development of Cased Water-Monitoring Wells
- QP-4 Sampling of Cased Water-Monitoring Well
- QP- 5 Composite Sampling of Excavation Sidewalls and Bottoms for TPH and Chloride Analysis
- QP-6 Sampling and Testing Protocol for VOC in soil
- QP-7 Composite Sampling of Excavation Sidewalls and Bottoms for BTEX
- QP-8 Procedure for Plugging and Abandonment of Cased Water-Monitoring wells

Rice Environmental Consulting and Safety

Quality Procedure Soil Samples for Transportation to a Laboratory

1.0 Purpose

This procedure outlines the methods to be employed when obtaining soil samples to be taken to a laboratory for analysis.

2.0 Scope

This procedure is to be used when collecting soil samples intended for ultimate transfer to a testing laboratory.

3.0 Preliminary

- 3.1 Obtain sterile sampling containers from the testing laboratory designated to conduct analyses of the soil.
- 3.2 If collecting TPH, BTEX, RCRA 8 metals, cation /anions or O&G, the sample jar may be a clear 4 oz. container with Teflon lid. If collecting PAH's, use an amber 4 oz. container.

4.0 Chain of Custody

- 4.1 Prepare a Sample Plan. The plan will list the number, location and designation of each planned sample and the individual tests to be performed on the sample. The sampler will check the list against the available inventory of appropriate sample collection bottles to insure against shortage.
- 4.2 Transfer the data to the Laboratory Chain of Custody Form. Complete all sections of the form except those that relate to the time of delivery of the samples to the laboratory.
- 4.3 Pre-label the sample collection jars. Include all requested information except time of collection. (Use a fine point Sharpie to insure that the ink remains on the label.) Affix the labels to the jars.

5.0 Sampling Procedure

- 5.1 Do not touch the soil with your bare hands. Use new nitrile gloves to help minimize any contamination.
- 5.2 Go to the sampling point with the sample container. If not analyzing for ions or metals, use a trowel to obtain the soil.

5.3 Pack the soil tightly into the container leaving the top slightly domed. Screw the lid down tightly. Enter the time of collection onto the sample collection jar label.

5.4 Place the sample directly on ice for transport to the laboratory if required.

5.5 Complete the Chain of Custody form to include the collection times for each sample. Deliver all samples to the laboratory.

6.0 Documentation

6.1 The testing laboratory shall provide the following minimum information:

- a. Project and sample name.
- b. Signed copy of the original Chain of Custody Form including the time the sample was received by the lab.
- c. Results of the requested analyses
- d. Test Methods employed
- e. Quality Control methods and results

Rice Environmental Consulting and Safety

QUALITY PROCEDURE Chloride Titration Using 0.282 Normal Silver Nitrate Solution

1.0 Purpose

This procedure is to be used to determine the concentration of chloride in soil.

2.0 Scope

This procedure is to be used as the standard field measurement for soil chloride concentrations.

3.0 Sample Collection and Preparation

- 3.1 Collect at least 80 grams of soil from the sample collection point. Take care to insure that the sample is representative of the general background to include visible concentrations of hydrocarbons and soil types. If necessary, prepare a composite sample for soils obtained at several points in the sample area. Take care to insure that no loose vegetation, rocks or liquids are included in the sample(s).
- 3.2 The soil sample(s) shall be immediately inserted into a one-quart or larger polyethylene freezer bag. Care should be taken to insure that no cross-contamination occurs between the soil sample and the collection tools or sample processing equipment.
- 3.3 The sealed sample bag should be massaged to break up any clods.

4.0 Sample Preparation

- 4.1 Tare a clean glass vial having a minimum 40 ml capacity. Add at least 10 grams of the soil sample and record the weight.
- 4.2 Add at least 20 grams of reverse osmosis water to the soil sample and shake well.
- 4.3 Allow the sample to set for a period of 5 minutes or until the separation of soil and water.

5.0 Titration Procedure

- 5.1 Using a graduated pipette, remove 10 ml extract and dispense into a clean plastic cup.
- 5.2 Add 2-3 drops potassium chromate (K_2CrO_4) to mixture if necessary.

5.3 Using a 1 ml pipette, carefully add .282 normal silver nitrate (one drop at a time) to the sample while constantly agitating it. Stop adding silver nitrate when the solution begins to change from yellow to red. Be consistent with endpoint recognition.

5.4 Record the ml of silver nitrate used.

6.0 Calculation

To obtain the chloride concentration, insert measured data into the following formula:

$$\frac{.282 \times 35,450 \times \text{ml AgNO}_3}{\text{ml water extract}} \times \frac{\text{grams of water in mixture}}{\text{grams of soil in mixture}}$$

Using Step 5.0, determine the chloride concentration of the RO water used to mix with the soil sample. Record this concentration and subtract it from the formula results to find the net chloride in the soil sample.

Record all results on the delineation form.

Rice Environmental Consulting and Safety

Quality Procedure
Development of Cased Water-Monitoring Wells

1.0 Purpose

This procedure outlines the methods to be employed to develop cased monitoring wells.

2.0 Scope

This procedure shall be used for developed, cased water monitoring wells. It is not to be used for standing water samples such as ponds or streams.

3.0 Sample Collection and Preparation

- 3.1 Prior to development, the static water level and height of the water column within the well casing will be measured with the use of an electric D.C. probe.
- 3.2 All measurements will be recorded within a field log notebook.
- 3.3 All equipment used to measure the static water level will be decontaminated after each use by means of Liquinox, a phosphate free laboratory detergent, and water to reduce the possibility of cross-contamination. The volume of water in each well casing will be calculated.

4.0 Purging

- 4.1 Wells will be purged by using a 2" decontaminated submersible pump or dedicated one liter Teflon bailer. Wells should be purged until the pH and conductivity are stabilized and the turbidity has been reduced to the greatest extent possible.
- 4.2 If a submersible is used the pump will be decontaminated prior to use by scrubbing the outside surface of tubing and wiring with a Liquinox water mixture, pumping a Liquinox-water mixture through the pump, and a final flush with fresh water.

5.0 Water Disposal

- 5.1 All purge and decontamination water will be temporarily stored within a portable tank to be later disposed of in an appropriate manner.

6.0 Records

- 6.1 Rice Environmental Consulting and Safety will record the amount of water removed from the well during development procedures. The purge volume will be reported to the appropriate regulatory authority when filing the closure report.

Rice Environmental Consulting and Safety

Quality Procedure Sampling of Cased Water-Monitoring Well

1.0 Purpose

This procedure outlines the methods to be employed in obtaining water samples from cased monitoring wells.

2.0 Scope

This procedure shall be used for developed, cased water monitoring wells. It is not to be used for standing water samples such as ponds or streams.

3.0 Preliminary

3.1 Obtain sterile sampling containers from the testing laboratory designated to conduct analyses of the water.

3.2 The following table shall be used to select the appropriate sampling container, preservative method and holding times for the various elements and compounds to be analyzed.

Compound to be Analyzed	Sample Container Size	Sample Container Description	Cap Requirements	Preservative	Maximum Hold Time
BTEX	40 ml	VOA Container	Teflon Lined	HCL	14 days
TPH (8015 Extended)	40 ounces	(2) 40ml VOA vials	Teflon Lined	HCL and Ice	14 days
PAH	1 liter	amber glass	Teflon Lined	Ice	7 days
Cation/Anion	1 liter	HD polyethylene	Any Plastic	None	48 Hrs
Metals	1 liter	HD polyethylene	Any Plastic	Ice/HNO ₃	28 Days
TDS	300 ml	clear glass or 250 ml HD polyethylene	Any Plastic	Ice	7 Days
Cl-	500 ml	HD polyethylene	Any Plastic	None	28 Days

4.0 Chain of Custody

- 4.1 Prepare a Sample Plan. The plan will list the well identification and the individual tests to be performed at that location. The sampler will check the list against the available inventory of appropriate sample collection bottles to insure against shortage.
- 4.2 Transfer the data to the Laboratory Chain of Custody Form. Complete all sections of the form except those that relate to the time of delivery of the samples to the laboratory.
- 4.3 Pre-label the sample collection jars. Include all requested information except time of collection. (Use a fine point Sharpie to insure that the ink remains on the label). Affix the labels to the jars.

5.0 Bailing Procedure

- 5.1 Identify the well from the sites schematics. Place pre-labeled jar(s) next to the well. Remove the plastic cap from the well bore by first lifting the metal lever and then unscrewing the entire assembly.
- 5.2 Using a dedicated one liter Teflon bailer or submersible pump, purge a minimum of three well volumes. Place the water in storage container for transport to a ROC disposal facility.
- 5.3 If using a bailer, take care to insure that the bailing device and string does not become cross-contaminated. A clean pair of nitrile gloves should be used when handling either the retrieval string or bailer. The retrieval string should not be allowed to come into contact with the ground.

6.0 Sampling Procedure

- 6.1 Once the well has been bailed in accordance with 5.2 of this procedure, a sample may be decanted into the appropriate sample collection jar directly from the bailer or submersible pump.
- 6.2 Note the time of collection on the sample jar with a fine Sharpie.
- 6.3 Place the sample directly on ice for transport to the laboratory. The preceding table shows the maximum hold times between collection and testing for the various analyses.

6.4 Complete the Chain of Custody form to include the collection times for each sample. Deliver all samples to the laboratory.

7.0 Documentation

- 7.1 The testing laboratory shall provide the following minimum information:
- A. Project and sample name.
 - B. Signed copy of the original Chain of Custody Form including the time the sample was received by the lab.
 - C. Results of the requested analyses
 - D. Test Methods employed
 - E. Quality Control methods and results

Calculation for Determining the Minimum Bailing Volume for Monitor Wells

$$\text{Formula } V = (\pi r^2 h)$$

2" well [V/231=gal] X 3 = Purge Volume

V=Volume

π =pi

r=inside radius of the well bore

h=maximum height of well bore in water table

Example:

π	r^2	h(in)	V(cu.in)	V(gal)	X 3 Volumes	Actual
3.1416	1	180	565.488	2.448	7.34 gal	>10 gal

Rice Environmental Consulting and Safety

Quality Procedure Composite Sampling of Excavation Sidewalls and Bottoms For TPH and Chloride Analysis

1.0 Purpose

This procedure outlines the methods to be employed when obtaining final composite soil samples for TPH and Chloride analysis.

2.0 Scope

This procedure is to be used in conjunction with *Quality Procedure – 02: Soil Samples for Transportation to a Laboratory* and will be inserted at subparagraph 5.2 of Section 5.0: Sampling Procedure.

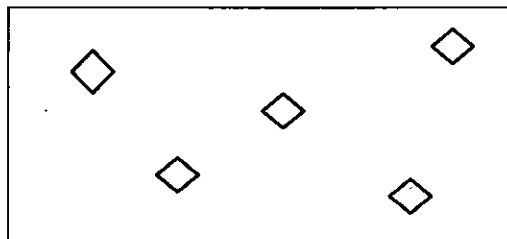
3.0 Sampling Procedure

Follow *Quality Procedure – 02: Soil Samples for Transportation to a Laboratory* for all Sections and subparagraphs until subparagraph 5.2 of Section 5.0: Sampling Procedure. Instead of 5.2 instructions, perform the composite sample collection procedure as follows:

3.1 Go to the excavation with a new plastic baggie. If not analyzing for ions or metals, use a trowel to obtain the soil. If the excavation is deeper than 6' BGS, do not enter the pit, but use a backhoe to assist in procurement of the sample. (If a backhoe is used, the backhoe will obtain an amount of soil from each composite point; bring the purchase to the surface staging area where a sample-portion of soil will be extracted from the backhoe purchase. The remainder of the backhoe purchase will be staged on the surface with other staged soils.)

3.2 Sidewall samples

3.2.1 On each sidewall, procure a 5oz sample from each of five distinct points on the sidewall with distinct points resembling the "W" pattern:



- 3.2.2 Thoroughly blend these five samples in a labeled baggie.
 - 3.2.3 Repeat steps 3.2.1 through 3.2.4 for each remaining sidewall.
 - 3.2.4 From each labeled baggie, procure a 5 oz portion and pour into a baggie labeled "Sidewall Composite". Blend this soil mixture completely.
 - 3.2.5 Obtain proper laboratory sample container for "Sidewall Composite" and continue with subparagraph 5.3 of QP – 01.
- 3.3 Bottom Sample
- 3.3.1 From bottom of excavation, procure a 5oz sample from each of five distinct points with distinct points resembling the "W" pattern as illustrated above.
 - 3.3.2 Thoroughly blend these five samples in a clean baggie.
 - 3.3.3 Obtain proper laboratory sample container for "Bottom Composite" and continue with subparagraph 5.3 of QP – 01.

Rice Environmental Consulting and Safety

QUALITY PROCEDURE

Sampling and Testing Protocol for VOC in Soil

1.0 Purpose

This procedure is to be used to determine the concentrations of Volatile Organic Compounds in soils.

2.0 Scope

This procedure is to be used as the standard field measurement for soil VOC concentrations. It is not to be used as a substitute for full spectrographic speciation of organic compounds.

3.0 Procedure

3.1 Sample Collection and Preparation

3.1.1 Collect at least 500 g. of soil from the sample collection point. Take care to insure that the sample is representative of the general background to include visible concentrations of hydrocarbons and soil types. If necessary, prepare a composite sample of soils obtained at several points in the sample area. Take care to insure that no loose vegetation, rocks or liquids are included in the sample(s).

3.1.2 The soil sample(s) shall be immediately inserted into a one-quart or larger polyethylene freezer bag and sealed. When sealed, the bag should contain a nearly equal space between the soil sample and trapped air. Record the sample name and the time that the sample was collected on the Field Analytical Report Form.

3.1.3 The sealed samples shall be allowed to set for a minimum of five minutes at a temperature of between 10-15 Celsius, (59-77⁰ F). The sample temperatures may be adjusted by cooling the sample in ice, or by heating the sample within a generally controlled environment such as the inside of a vehicle. The samples should not be placed directly on heated surfaces or placed in direct heat sources such as lamps or heater vents.

3.1.4 The sealed sample bag should be massaged to break up any clods, and to provide the soil sample with as much exposed surface area as practically possible.

3.2 Sampling Procedure

- 3.2.1 The instrument to be used in conducting VOC concentration testing shall be a RAE Systems Photoionization device. (Device will be identified on VOC Field Test Report Form.) Prior to use, the instrument shall be zeroed-out in accordance with the appropriate maintenance and calibration procedure outlined in the instrument operation manual. The PID device will be calibrated each day it's used.
- 3.2.2 Carefully open one end of the collection bag and insert the probe tip into the bag taking care that the probe tip not touch the soil sample or the sidewalls of the bag.
- 3.2.3 Set the instrument to retain the highest result reading value. Record the reading onto the Field Test Report Form.
- 3.2.4 **If the instrument provides a reading exceeding 100 ppm, proceed to QP-7. If the reading is 100 ppm or less, NMOCDBTEX guideline has been met and no further testing for BTEX is necessary. File the Field Test Report Form in the project file.**

4.0 Clean-up

After testing, the soil samples shall be returned to the sampling location, and the bags collected for off-site disposal. **IN NO CASE SHALL THE SAME BAG BE USED TWICE. EACH SAMPLE CONTAINER MUST BE DISCARDED AFTER EACH USE.**

Rice Environmental Consulting and Safety

Quality Procedure Composite Sampling of Excavation Sidewalls and Bottoms For BTEX

1.0 Purpose

This procedure outlines the methods to be employed when obtaining final composite soil samples for BTEX analysis.

2.0 Scope

This procedure is to be used when collecting soil samples intended for ultimate transfer to a testing laboratory for BTEX analysis. This procedure is to be used only when the PID field-test results for OVM exceeds 100 ppm.

3.0 Preliminary

- 3.1 Obtain sterile, clear, 2 oz. glass containers with Teflon lid from a laboratory supply company or the testing laboratory designated to conduct analyses of the soil.

4.0 Chain of Custody

- 4.1 Prepare a Sample Plan. The plan will list the number, location and designation of each planned sample and the individual tests to be performed on the sample. The sampler will check the list against the available inventory of appropriate sample collection bottles to insure against shortage.
- 4.2 Transfer the data to the Laboratory Chain of Custody Form. Complete all sections of the form except those that relate to the time of delivery of the samples to the laboratory.
- 4.3 Pre-label the sample collection jars. Include all requested information except time of collection. (Use a fine point Sharpie to insure that the ink remains on the label.) Affix the labels to the jars.

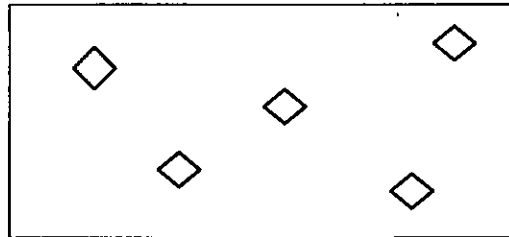
5.0 Sampling Procedure

- 5.1. Do not touch the soil with your bare hands. Use new nitrile gloves to help minimize any cross-contamination.
- 5.2. If safe and within OSHA regulations, go to the sampling point with the sample container. If not analyzing for ions or metals, use a trowel to

obtain the soil. If the excavation is deeper than 6' BGS, do not enter the pit, but use a backhoe to assist in procurement of the sample. (If a backhoe is used, the backhoe will obtain an amount of soil from each composite point; bring the purchase to the surface staging area where a sample-portion of soil will be extracted from the backhoe purchase. The remainder of the backhoe purchase will be staged on the surface with other staged soils.)

5.3. Sidewall Samples

5.3.1. On each sidewall, procure a 2oz sample from each of five distinct points on the sidewall with distinct points resembling the "W" pattern:



5.4. Pack the soil tightly into the container leaving the top slightly domed. Screw the lid down tightly. Enter the time of collection onto the sample collection jar label. Repeat for each sampling point.

5.5. Place the samples directly on ice for transport to the laboratory if required.

5.6. Complete the Chain of Custody form to include the collection times for each sample. Deliver all samples to the laboratory.

6.0 Documentation

6.1 The testing laboratory shall provide the following minimum information:

- a. Project and sample name.
- b. Signed copy of the original Chain of Custody Form including the time the sample was received by the lab.
- c. Results of the requested analyses
- d. Test Methods employed
- e. Quality Control methods and results

Rice Environmental Consulting and Safety

Procedure for Plugging & Abandonment of Cased Water Monitoring Wells

1.0 Purpose

This procedure outlines the methods to be employed to plug and abandon cased monitoring wells.

2.0 Scope

This procedure shall be used for developed, cased water monitoring wells located in the State of New Mexico

3.0 Preliminary

3.1 No well may be drilled, modified or plugged without NMOCD approval. Additional approvals may be required if the well is situated in a sensitive area, within municipal jurisdictions or on federal or tribal lands.

4.0 Plugging

4.1 Each bore will be filled with a 1% - 3% bentonite/concrete slurry to three feet bgs. The remaining three feet will be capped with concrete only.

4.2 All wellheads will be removed to below ground surface.

5.0 Records

5.1 The company plugging the well shall prepare a report on their company letter head listing the site name and describing general well construction including total depth of the well, the diameter of casing, material used to plug the well (e.g. bentonite/cement slurry), and date of the plugging operation.

5.2 It is recommended but not required that photographs of the final surface restoration be taken and included within the records.

5.3 Copies of the plugging report shall be submitted to all appropriate agencies and retained by the well operator for a minimum period of ten years.