

1R - 427-08

WORKPLANS

Date:

9-23-10

Rice Environmental Consulting & Safety

P.O. Box 5630 Hobbs, NM 88241
Phone 575.393.4411 Fax 575.393.0293

RECEIVED OGD

2010 SEP 24 P 1:12

CERTIFIED MAIL

RETURN RECEIPT NO. 7009 1680 0001 6619 6231

September 23rd, 2010

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: INVESTIGATION & CHARACTERIZATION PLAN
Rice Operating Company – EME SWD System
EME Jct. D-25 (1R427-08): UL/D sec. 25 T20S R36E**

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. 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/usage basis. Environmental projects of this nature require System Party AFE approval prior to work commencing at the site. In general, project funding is not forthcoming until NMOCD approves the work plan. Therefore, your timely review of this submission is greatly appreciated.

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 6 miles south-west of Monument, New Mexico at UL/D sec. 25 T20S R36E as shown on the Site Location Map (Figure 1). NM OSE records indicate that groundwater will likely be encountered at a depth of approximately 68 +/- feet.

In 2002, ROC initiated work on the former EME B-7 junction box. The site was delineated using a backhoe and soil samples were screened at regular intervals for both hydrocarbons and chlorides. The excavation reached dimensions of 40 x 33 x 15 feet bgs where composite samples were collected for laboratory verification. Laboratory tests of the site showed gasoline range organics (GRO) readings of 723 mg/kg in the 4-wall composite, 1,210 mg/kg in the bottom composite, and negligible readings in the remediated backfill. Diesel range organics (DRO) ranged from 265 mg/kg in the 4-wall composite, 538 mg/kg in the bottom composite, and 138 mg/kg in the remediated backfill. Chlorides at the site ranged from 727 mg/kg on the 4-wall composite, 727 mg/kg for the bottom composite at 15 ft bgs, and 88.6 for the remediated backfill. BTEX laboratory results can be found in Appendix A. A clay layer was installed at the bottom of the excavation to inhibit further chloride migration. The soils were blended on site and then backfilled into the excavation. 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. A new junction box was not required at the site.

NMOCD was notified of potential groundwater impact on January 31, 2003 and a junction box disclosure report (Appendix A) was submitted to NMOCD with all the 2003 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 and/or hydrocarbons at the site.

Proposed Work Elements

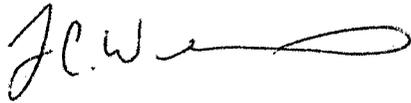
1. Conduct vertical and lateral delineation of residual soil hydrocarbons and chlorides (see Appendix B for Quality Procedures).
 - a. Vertical sampling will be conducted until either one of the following criteria is met in the field.
 - i. Three samples in which the chloride concentration decreases and the third sample has a chloride concentration of ≤ 250 ppm.
 - ii. Three samples in which PID readings decrease and the third sample has a PID reading of ≤ 100 ppm.
 - iii. The sampling reaches the capillary fringe.
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 and/or hydrocarbons, then only a vadose zone remedy will be undertaken. However, if

groundwater shows impact from residual chlorides and/or hydrocarbons, a CAP will be developed to address these concerns.

ROC 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.

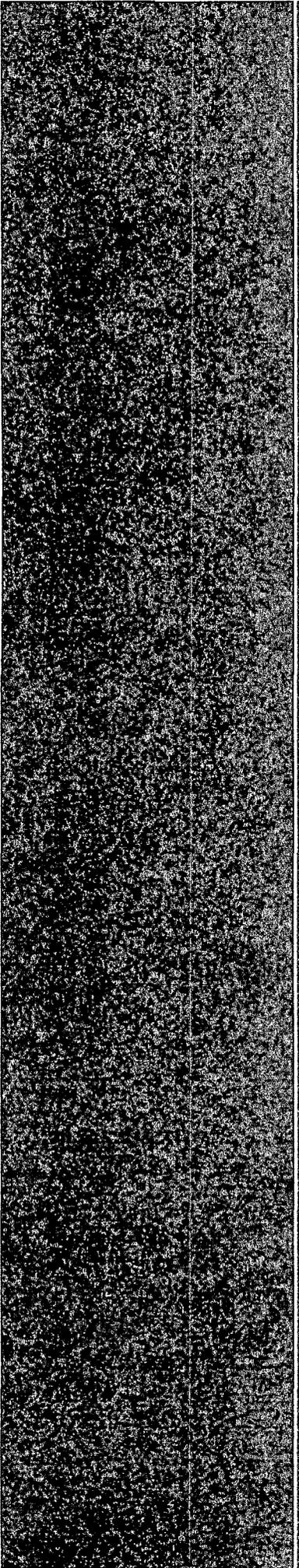
Sincerely,

A handwritten signature in black ink, appearing to read 'L.W.' followed by a stylized flourish.

Lara Weinheimer
Project Scientist
RECS
(575) 441-0431

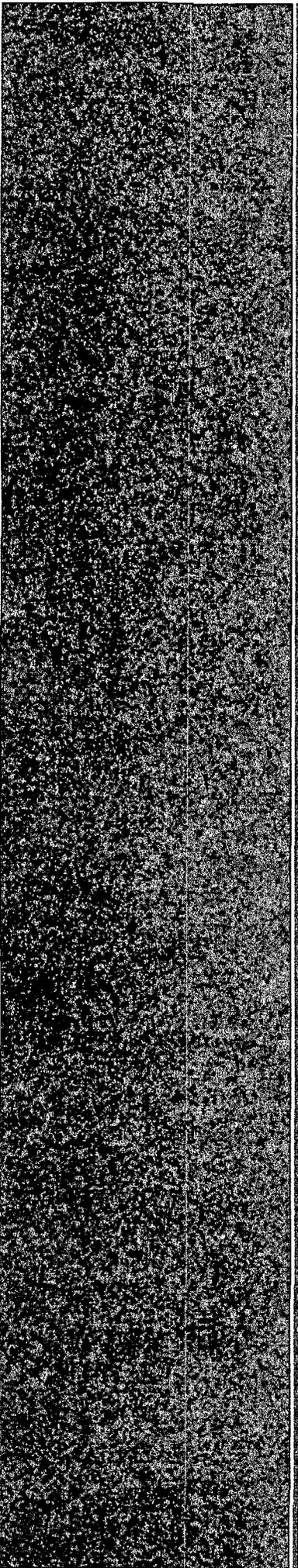
Attachments:

- Figures – Site location map
- Appendix A – Junction Box Disclosure Report
- Appendix B – Quality Procedures



Figures

RICE Environmental Consulting and Safety (RECS)
P.O. Box 5630 Hobbs, NM 88241
Phone 575.393.4411 Fax 575.393.0293



Appendix A

Junction Box Disclosure Report

RICE Environmental Consulting and Safety (RECS)
P.O. Box 5630 Hobbs, NM 88241
Phone 575.393.4411 Fax 575.393.0293

**RICE OPERATING COMPANY
JUNCTION BOX DISCLOSURE REPORT**

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
							Length	Width	Depth
EME	D-25	D	25	20 S	36 E	Lea	No Box		

LAND TYPE: BLM STATE FEE LANDOWNER Tuffy Cooper OTHER

Depth to Groundwater 68 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 3/21/2002 Date Completed 4/8/2002 OCD Witness No

Soil Excavated 733 cubic yards Excavation Length 40 Width 33 Depth 15 feet

Soil Disposed 24 cubic yards Offsite Facility South Monument Location Monument, NM

FINAL ANALYTICAL RESULTS: Sample Date 4/1/2002 Sample Depth 15' bgs

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

Sample Location	Benzene ug/kg	Toluene ug/kg	Ethyl Benzene ug/kg	Total Xylenes ug/kg	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SIDEWALLS	49.7	73.7	231	945	723	265	727
BOTTOM	50.8	284	228	1035	1210	538	727
REMEDIAED	<0.025	<0.025	<0.025	0.029	<10.0	138	88.6

General Description of Remedial Action: A 40' x 33' x 15' excavation exhibited relatively consistent chloride impact vertically and TPH concentrations did not meet NMOCD guidelines so a compacted clay barrier was installed at the bottom of the excavation and the soil was blended and backfilled. Because the concentrations did not meet guidelines, this site is reported as a disclosure. An abandoned production battery is located 50' north of this location. A junction box was no longer required at this location.

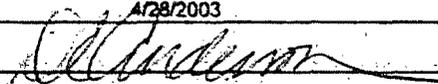
CHLORIDE FIELD TESTS

LOCATION	DEPTH (ft)	ppm
Vertical	5	500
	9	800
	13	800
	15	800
Wall comp.	n/a	650
bottom comp.	15	650

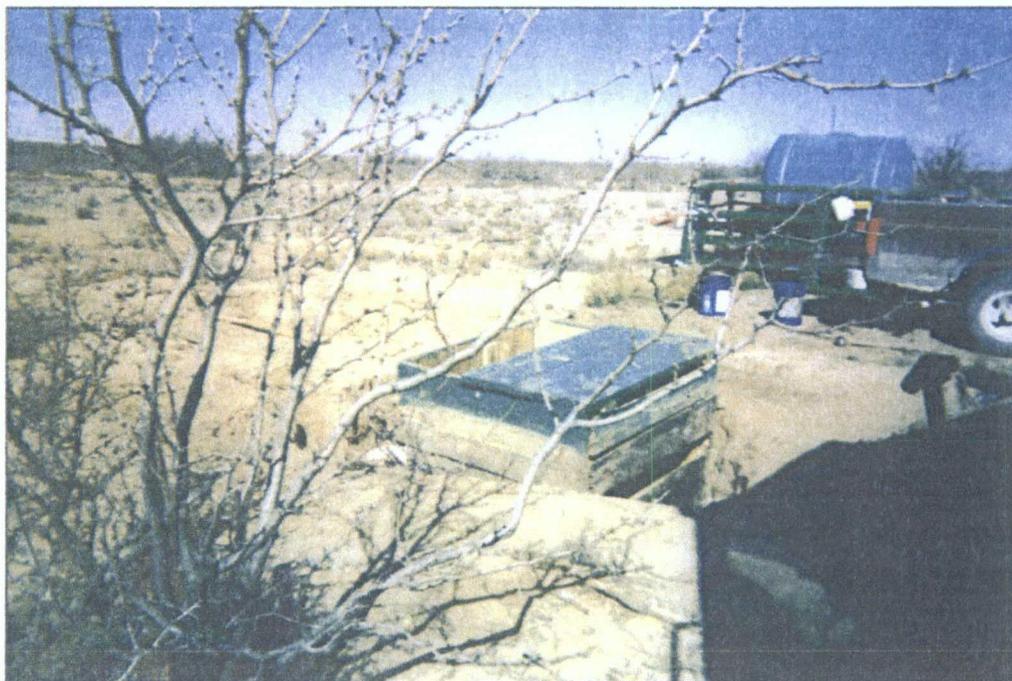
cc: lab results, photos, disposal tickets

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

DATE 4/28/2003 PRINTED NAME Donnie Anderson

SIGNATURE  TITLE Project Leader-Environmental

EME jct. D-25



Old jct. box (NORM removal)



New plumbing after NORM removal



Excavation



Backfilling

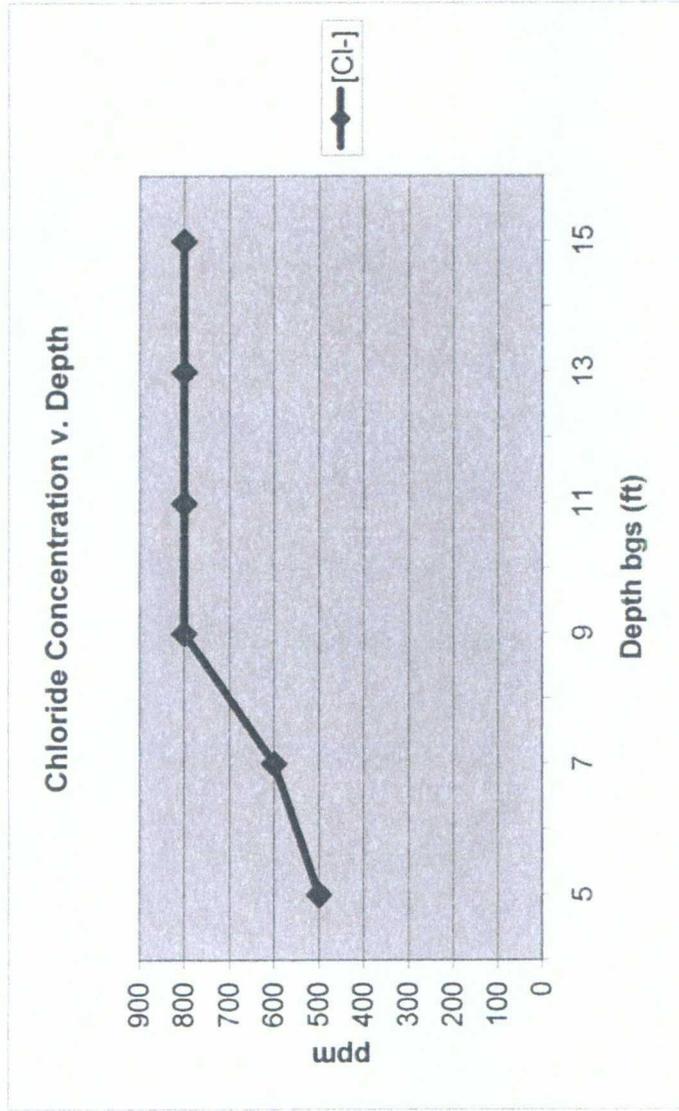
CHLORIDE CONCENTRATION CURVE

RICE Operating Company

EME jct. D-25
T20S R36E

Depth bgs (ft)	[Cl-] ppm
5	500
7	600
9	800
11	800
13	800
15	800

Groundwater = 68 ft



ANALYTICAL REPORT

Prepared for:

Kristin Farris
Rice Operating
122 W. Taylor
Hobbs, NM 88240

Project: D-25

PO#:

Order#: G0306371

Report Date: 05/02/2003

Certificates

US EPA Laboratory Code TX00158

ENVIRONMENTAL LAB OF TEXAS

SAMPLE WORK LIST

Rice Operating
122 W. Taylor
Hobbs, NM 88240
505-397-1471

Order#: G0306371
Project:
Project Name: D-25
Location: EME

The samples listed below were submitted to Environmental Lab of Texas and were received under chain of custody. Environmental Lab of Texas makes no representation or certification as to the method of sample collection, sample identification, or transportation/handling procedures used prior to the receipt of samples by Environmental Lab of Texas, unless otherwise noted.

<u>Lab ID:</u>	<u>Sample :</u>	<u>Matrix:</u>	<u>Date / Time</u> <u>Collected</u>	<u>Date / Time</u> <u>Received</u>	<u>Container</u>	<u>Preservative</u>
0306371-01	Rem. Pile Comp	SOIL	4/29/03 11:00	4/29/03 14:10	4 oz Glass	Ice
	<u>Lab Testing:</u>	Rejected: No		Temp: 4°C		
	8015M					
	8021B/5030 BTEX					
	Chloride					

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Kristin Farris
 Rice Operating
 122 W. Taylor
 Hobbs, NM 88240

Order#: G0306371
 Project:
 Project Name: D-25
 Location: EME

Lab ID: 0306371-01
 Sample ID: Rem. Pile Comp

8015M

Method	Date	Date	Sample	Dilution	Analyst	Method
Blank	Prepared	Analyzed	Amount	Factor	WL	8015M
		4/29/03	1	1		

Parameter	Result mg/kg	RL
GRO, C6-C12	<10.0	10.0
DRO, >C12-C35	138	10.0
TOTAL, C6-C35	138	10.0

Surrogates	% Recovered	QC Limits (%)	
1-Chlorooctane	110%	70	130
1-Chlorooctadecane	102%	70	130

8021B/5030 BTEX

Method	Date	Date	Sample	Dilution	Analyst	Method
Blank	Prepared	Analyzed	Amount	Factor	CK	8021B
0005396-02		5/1/03 15:59	1	25		

Parameter	Result mg/kg	RL
Benzene	<0.025	0.025
Toluene	<0.025	0.025
Ethylbenzene	<0.025	0.025
p/m-Xylene	0.029	0.025
o-Xylene	<0.025	0.025

Surrogates	% Recovered	QC Limits (%)	
aaa-Toluene	89%	80	120
Bromofluorobenzene	103%	80	120

Approval: *Raland K. Tuttle* 5-02-03
 Raland K. Tuttle, Lab Director, QA Officer Date
 Caley D. Keene, Org. Tech. Director
 Jeanne McMurrey, Inorg. Tech. Director
 Sandra Biezugbe, Lab Tech.
 Sara Molina, Lab Tech.

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Kristin Farris
Rice Operating
122 W. Taylor
Hobbs, NM 88240

Order#: G0306371
Project:
Project Name: D-25
Location: EME

Lab ID: 0306371-01
Sample ID: Rem. Pile Comp

Test Parameters

<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Dilution Factor</u>	<u>RL</u>	<u>Method</u>	<u>Date Analyzed</u>	<u>Analyst</u>
Chloride	88.6	mg/kg	1	20	9255	5/1/03	CK

Approval: Ralan K. Tuttle 5-0203
Ralan K. Tuttle, Lab Director, QA Officer Date
Celey D. Keene, Org. Tech. Director
Jeanne McMurrey, Inorg. Tech. Director
Sandra Biezugbe, Lab Tech.
Sara Molina, Lab Tech.

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

8015M

Order#: G0306371

<i>BLANK</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg		0005371-02			<10.0		
<i>CONTROL</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg		0005371-03		952	799	83.9%	
<i>CONTROL DUP</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg		0005371-04		952	814	85.5%	1.9%
<i>SRM</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg		0005371-05		1000	792	79.2%	

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

8021B/5030 BTEX

Order#: G0306371

BLANK							
	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene-mg/kg		0005396-02			<0.025		
Toluene-mg/kg		0005396-02			<0.025		
Ethylbenzene-mg/kg		0005396-02			<0.025		
p/m-Xylene-mg/kg		0005396-02			<0.025		
o-Xylene-mg/kg		0005396-02			<0.025		
CONTROL							
	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene-mg/kg		0005396-03		0.1	0.098	98.0%	
Toluene-mg/kg		0005396-03		0.1	0.100	100.0%	
Ethylbenzene-mg/kg		0005396-03		0.1	0.109	109.0%	
p/m-Xylene-mg/kg		0005396-03		0.2	0.230	115.0%	
o-Xylene-mg/kg		0005396-03		0.1	0.105	105.0%	
CONTROL DUP							
	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene-mg/kg		0005396-04		0.1	0.101	101.0%	3.0%
Toluene-mg/kg		0005396-04		0.1	0.105	105.0%	4.9%
Ethylbenzene-mg/kg		0005396-04		0.1	0.110	110.0%	9.9%
p/m-Xylene-mg/kg		0005396-04		0.2	0.237	118.5%	3.0%
o-Xylene-mg/kg		0005396-04		0.1	0.110	110.0%	4.7%
SRM							
	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene-mg/kg		0005396-05		0.1	0.088	88.0%	
Toluene-mg/kg		0005396-05		0.1	0.091	91.0%	
Ethylbenzene-mg/kg		0005396-05		0.1	0.099	99.0%	
p/m-Xylene-mg/kg		0005396-05		0.2	0.208	104.0%	
o-Xylene-mg/kg		0005396-05		0.1	0.096	96.0%	

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

Test Parameters:

Order#: G0306371

<i>BLANK</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg		0005391-01			<20.0		
<i>MS</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg		0306371-01	88.6	500	638	109.9%	
<i>MSD</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg		0306371-01	88.6	500	603	102.9%	5.6%
<i>SRM</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg		0005391-04		5000	5050	101%	

ANALYTICAL REPORT

Prepared for:

Derek Robinson
RE Environmental
P.O. Box 13418
Odessa, TX 79764

Project: Rice Oper. *D-25*

Order#: G0202987

Report Date:

Certificates

US EPA Laboratory Code TX00158

ENVIRONMENTAL LAB OF TEXAS

SAMPLE WORK LIST

RE Environmental
P.O. Box 13418
Odessa, TX 79764
366-0804

Order#: G0202987
Project: EME
Project Name: Rice Oper.
Location: D-25 Junction

The samples listed below were submitted to Environmental Lab of Texas and were received under chain of custody. Environmental Lab of Texas makes no representation or certification as to the method of sample collection, sample identification, or transportation/handling procedures used prior to the receipt of samples by Environmental Lab of Texas.

<u>Lab ID:</u>	<u>Sample :</u>	<u>Matrix:</u>	<u>Date / Time</u> <u>Collected</u>	<u>Date / Time</u> <u>Received</u>	<u>Container</u>	<u>Preservative</u>
0202987-01	4 pt. Wall Comp. @ 14"	SOIL	03/28/2002 14:30	04/03/2002 8:25	4 oz glass	Ice
	<u>Lab Testing:</u>	Rejected: No		Temp: 4.0 C		
	8015M					
	8021B/5030 BTEX					
	Chloride					
0202987-02	5 pt. Bottom Comp. @ 15'	SOIL	04/01/2002 14:07	04/03/2002 8:25	4 oz glass	Ice
	<u>Lab Testing:</u>	Rejected: No		Temp: 4.0 C		
	8015M					
	8021B/5030 BTEX					
	Chloride					

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Derek Robinson
 RE Environmental
 P.O. Box 13418
 Odessa, TX 79764

Order#: G0202987
 Project: EME
 Project Name: Rice Oper.
 Location: D-25 Junction

Lab ID: 0202987-01
 Sample ID: 4 pt. Wall Comp. @ 14'

8015M

<u>Method</u>	<u>Date</u>	<u>Date</u>	<u>Sample</u>	<u>Dilution</u>	<u>Analyst</u>	<u>Method</u>
Blank	Prepared	Analyzed	Amount	Factor	CK	8015M
		04/05/2002	1	1		

Parameter	Result mg/kg	RL
DRO, >C12-C35	723	10.0
GRO, C6-C12	265	10.0
TOTAL, C6-C35	988	10.0

8021B/5030 BTEX

<u>Method</u>	<u>Date</u>	<u>Date</u>	<u>Sample</u>	<u>Dilution</u>	<u>Analyst</u>	<u>Method</u>
Blank	Prepared	Analyzed	Amount	Factor	CK	8021B
0001102-02		04/04/2002	1	1		
		17:24				

Parameter	Result µg/kg	RL
Benzene	49.7	25.0
Ethylbenzene	231	25.0
Toluene	73.7	25.0
p/m-Xylene	750	25.0
o-Xylene	195	25.0

Lab ID: 0202987-02
 Sample ID: 5 pt. Bottom Comp. @ 15'

8015M

<u>Method</u>	<u>Date</u>	<u>Date</u>	<u>Sample</u>	<u>Dilution</u>	<u>Analyst</u>	<u>Method</u>
Blank	Prepared	Analyzed	Amount	Factor	CK	8015M
		04/05/2002	1	1		

Parameter	Result mg/kg	RL
DRO, >C12-C35	1210	10.0
GRO, C6-G12	538	10.0
TOTAL, C6-C35	1748	10.0

DL = Diluted out N/A = Not Applicable RL = Reporting Limit

Page 1 of 2

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Derek Robinson
 RE Environmental
 P.O. Box 13418
 Odessa, TX 79764

Order#: G0202987
 Project: EME
 Project Name: Rice Oper.
 Location: D-25 Junction

Lab ID: 0202987-02
 Sample ID: 5 pt. Bottom Comp. @ 15'

8021B/5030 BTEX

Method	Date	Date	Sample	Dilution	Analyst	Method
Blank	Prepared	Analyzed	Amount	Factor		
0001102-02		04/04/2002 17:46	1	1	CK	8021B

Parameter	Result µg/kg	RL
Benzene	50.8	25.0
Ethylbenzene	228	25.0
Toluene	284	25.0
p/m-Xylene	815	25.0
o-Xylene	220	25.0

Approval: *Celest D. Keene 4/9/02*
 Roland K. Tuttle, Lab Director, QA Officer
 Celest D. Keene, Org. Tech. Director
 Jeanne McMurrey, Inorg. Tech. Director
 Sandra Biezugbe, Lab Tech.
 Sara Molina, Lab Tech.

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Derek Robinson
 RE Environmental
 P.O. Box 13418
 Odessa, TX 79764

Order#: G0202987
 Project: EME
 Project Name: Rice Oper.
 Location: D-25 Junction

Lab ID: 0202987-01
 Sample ID: 4 pt. Wall Comp. @ 14'

Test Parameters

<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Dilution Factor</u>	<u>RL</u>	<u>Method</u>	<u>Date Analyzed</u>	<u>Analyst</u>
Chloride	727	mg/kg	1	5.0	9253	04/04/2002	SB

Lab ID: 0202987-02
 Sample ID: 5 pt. Bottom Comp. @ 15'

Test Parameters

<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Dilution Factor</u>	<u>RL</u>	<u>Method</u>	<u>Date Analyzed</u>	<u>Analyst</u>
Chloride	727	mg/kg	1	5.0	9253	04/04/2002	SB

Approval: Celley D. Keene 4/9/02
 Date: _____
 Roland K. Tuttle, Lab Director, QA Officer
 Celley D. Keene, Org/Tech Director
 Jeanne McMurrey, Inorg. Tech. Director
 Sandra Biezughe, Lab Tech.
 Sara Molina, Lab Tech.

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

8015M

Order#: G0202987

<i>BLANK</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg		0001114-02			<10.0		
<i>MS</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg		0202971-02	42.7	952	1118	112.2%	
<i>MSD</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg		0202971-02	42.7	952	1161	117.5%	4.4%
<i>SRM</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg		0001114-05		1000	954	95.4%	

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

8021B/5030 BTEX

Order#: G0202987

BLANK		SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene-µg/kg			0001102-02			<25.0		
Ethylbenzene-µg/kg			0001102-02			<25.0		
Toluene-µg/kg			0001102-02			<25.0		
p/m-Xylene-µg/kg			0001102-02			<25.0		
o-Xylene-µg/kg			0001102-02			<25.0		
MS		SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene-µg/kg			0202960-17	0	100	110	110%	
Ethylbenzene-µg/kg			0202960-17	0	100	112	112%	
Toluene-µg/kg			0202960-17	0	100	112	112%	
p/m-Xylene-µg/kg			0202960-17	0	200	226	113%	
o-Xylene-µg/kg			0202960-17	0	100	112	112%	
MSD		SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene-µg/kg			0202960-17	0	100	115	115%	4.4%
Ethylbenzene-µg/kg			0202960-17	0	100	114	114%	1.8%
Toluene-µg/kg			0202960-17	0	100	116	116%	3.5%
p/m-Xylene-µg/kg			0202960-17	0	200	239	119.5%	5.6%
o-Xylene-µg/kg			0202960-17	0	100	112	112%	0%
SRM		SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene-µg/kg			0001102-05		100	110	110%	
Ethylbenzene-µg/kg			0001102-05		100	112	112%	
Toluene-µg/kg			0001102-05		100	110	110%	
p/m-Xylene-µg/kg			0001102-05		200	228	114%	
o-Xylene-µg/kg			0001102-05		100	112	112%	

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

Test Parameters

Order#: G0202987

<i>BLANK</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg		0001077-01			<5.00		
<i>MS</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg		0202987-01	727	500	1230	100.6%	
<i>MSD</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg		0202987-01	727	500	1220	98.6%	0.8%
<i>SRM</i>	SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/kg		0001077-04		5000	5050	101.2%	

TRANSPORTERS MANIFEST

MANIFEST# _____

SHIPPING FACILITY NAME & ADDRESS:

RICE OPERATING COMPANY
122 WEST TAYLOR
HOBBS, NM 88240

LOCATION OF MATERIAL:

SEC. 25 T 20 S R 36 E
SYSTEM EME SWD
JCT. D-25

ALL This Info must be on Sundance ticket

Co. Man Donnie Anderson

TRANSPORTER NAME & ADDRESS:

RE Environmental
Post Office Box 13418
Odessa, TX 79768

DESCRIPTION OF WASTE:

OILFIELD CONTAMINATED SOIL
EXEMPT

QUANTITY YARDS 12

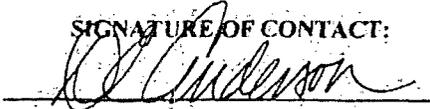
FACILITY CONTACT:

Donnie Anderson

DATE

4-2-02

SIGNATURE OF CONTACT:



PHONE 370-5841

NAME OF TRANSPORTER: (DRIVER)

DATE:

SIGNATURE OF DRIVER

DISPOSAL SITE:

SUNDANCE SERVICES INC.
PARABO FACILITY
P.O. BOX 1737
EUNICE, NM 88231

DATE:

SIGNATURE OF REPRESENTATIVE

South Monument Surface Waste Facility

Permit # NM-01-0032

P.O. Box 418

Hobbs N.M. 88241

505-393-3174

OF LOADS

11

SOUTH MONUMENT SURFACE WASTE FACILITY

TICKET# _____

LEASE OPERATOR:
RICE OPERATING
122 WEST TAYLOR
HOBBS, NM 88240
ATTN: DONNIE ANDERSON

ORIGINATING LOCATION:
JCT. D-25
S25 T28S R36E

TRANSPORTER NAME & ADDRESS:
RE ENVIRONMENTAL

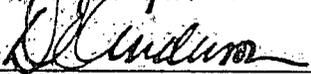
DESCRIPTION OF WASTE:

NON-HAZARDOUS HYDROCARBONS

QUANTITY:

27 YDS.

FACILITY CONTACT:



SIGNATURE OF CONTACT

DATE

CELL NUMBER MATERIAL PLACED IN:

C-1

SIGNATURE OF TRANSPORTER (DRIVER):



SIGNATURE OF DRIVER

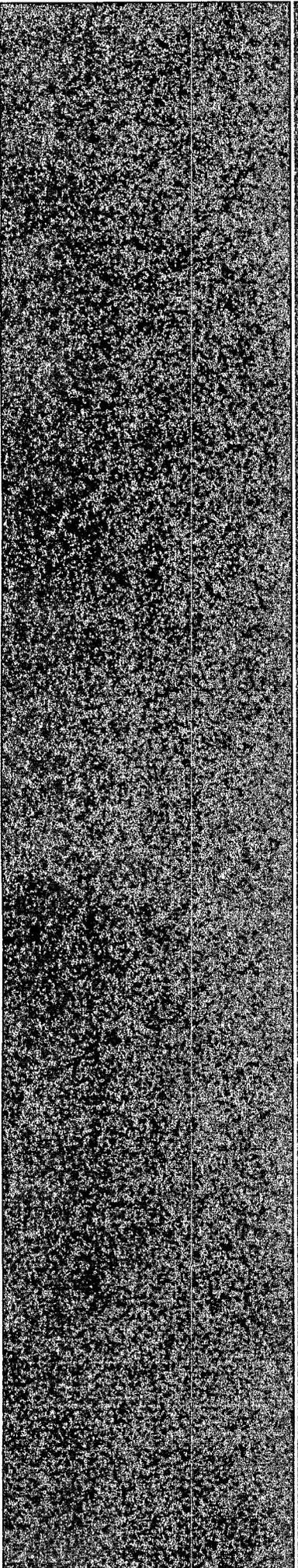
DATE

DISPOSAL SITE
SOUTH MONUMENT SURFACE WASTE FACILITY
P.O. BOX 418
HOBBS, NM 88241-0418
S25 T20S R36E N/2 NE/4

"As a condition of acceptance for disposal, I hereby certify that this waste is an exempt waste as defined by the Environmental Protection Agency (EPA). The waste are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C Regulations; and not mixed with non-exempt waste."

FACILITY REPRESENTATIVE

DATE



Appendix B

Quality Procedures

RICE Environmental Consulting and Safety (RECS)
P.O. Box 5630 Hobbs, NM 88241
Phone 575.393.4411 Fax 575.393.0293

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

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

2" well $[V/231 = \text{gal}] \times 3 = \text{Purge Volume}$

V=Volume

$\pi = \text{pi}$

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.

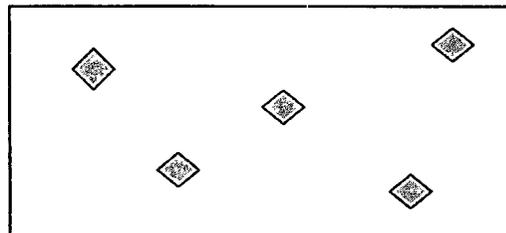
3.0 Sampling Procedure

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.
 - 3.2.3 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, (59-77⁰F). 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, NMOCD BTEX 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.

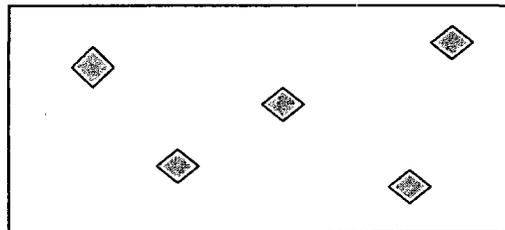
5.0 Sampling Procedure

- 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.

6.0 Records

6.1 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.

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

6.3 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.