

# RICE *Operating Company*

112 West Taylor • Hobbs, New Mexico 88240

Phone: (575) 393-9174 • Fax: (575) 397-1471

**April 1, 2021**

## **Bradford Billings**

New Mexico Oil Conservation Division  
1220 So. St. Francis Drive  
Santa Fe, New Mexico 87505

Review of 2020 Annual Groundwater Report: Content satisfactory

1. Continue sampling on a quarterly schedule
2. OCD pre-approves the elimination of BTEX and sulfate from further laboratory analysis.
3. Submit summarized activities completed and their results in a 2021 Annual Report. Submittal to OCD expected no later than March 31, 2022.
4. OCD requires an abatement plan be submitted for pre-approval to address the source and down gradient areas to effectively reduce chloride & total dissolved solids (TDS) in groundwater. OCD suggest arranging a meeting to discuss alternative methods in order to mitigate the elevated values.

**RE: 2020 Annual Groundwater Report  
Rice Operating Company – Justis SWD System  
Justis P-2 vent (1R423-18): UL P, Section, 2, T25S, R37E**

Mr. Billings:

ROC is the service provider (agent) for the Justis Saltwater Disposal System and has no ownership of any portion of the pipelines, wells, or facilities. The Justis System is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis.

## **Background and Previous Work**

The site is located approximately 4 miles northeast of Jal, New Mexico at UL/P, Sec. 2, T25S, R37E as shown on the Geographical Location Map. Groundwater sampling at the site indicated the depth to groundwater is approximately 76 feet below ground surface (bgs).

In 2005, ROC initiated work on the former P-2 vent junction box. The site was delineated using a backhoe to form a 30 ft x 30 ft x 6 ft deep excavation and soil samples were screened at regular intervals for both hydrocarbon and chloride. From the excavation, a 4-wall composite sample and a bottom composite sample were sent to a commercial laboratory for analysis, resulting in elevated chloride concentrations. At 6 – 5 ft bgs, a one ft thick clay barrier was installed. The clay layer will provide a barrier that will inhibit the downward migration of chloride to groundwater. Clean, imported soil was blended with the remaining soil and the excavation was backfilled to the ground surface. On October 20<sup>th</sup>, 2006, the site was seeded with a blend of native vegetation.

To further investigate the depth of chloride presence, a soil bore was installed on November 5<sup>th</sup>, 2009. Soil samples were collected at regular intervals and representative samples were sent to a commercial laboratory for analysis. The entire borehole was plugged with bentonite to ground surface. NMOCD was notified of potential groundwater impact on November 20<sup>th</sup>, 2009. A junction box disclosure report was submitted to NMOCD with all the 2010 junction box closures and disclosures.

An Investigation and Characterization Plan (ICP) was submitted to NMOCD on March 8<sup>th</sup>, 2010 and approved on August 18<sup>th</sup>, 2010. According to the ICP, a total of seven soil bores were installed at the site on March 15<sup>th</sup>, 16<sup>th</sup>, and 17<sup>th</sup>, 2010. An additional five soil bores were drilled on January

30<sup>th</sup> and 31<sup>st</sup>, 2012, and an additional four bores were drilled on April 24<sup>th</sup> and 27<sup>th</sup>, 2012. Soil samples were collected at regular intervals and representative samples were sent to a commercial laboratory for analysis. Each borehole was plugged with bentonite to the ground surface.

On March 16<sup>th</sup>, 2010, a near-source monitoring well, MW-1, was installed approximately 90 ft southeast of the former junction box. Soil samples were collected at regular intervals and representative samples were sent to a commercial laboratory for analysis. An up-gradient monitoring well, MW-2, was installed on January 30<sup>th</sup>, 2012, and soil samples were collected at regular intervals. The wells have been sampled regularly since installation. The most recent sampling event resulted in a chloride concentration of 3,100 mg/L in MW-1 and 510 mg/L in MW-2. BTEX concentrations have remained below detectable limit in each well since installation. The samples collected from the up-gradient well (MW-2) suggests a non-ROC, up-gradient source has contributed to the degradation of groundwater quality. ROC will continue quarterly sampling in 2021.

Attached is the Appendix, which contains:

1. A Geographical Location Map.
2. A map showing well locations.
3. A table presenting all laboratory results and depth to groundwater for the well at the site, and a graph showing recent laboratory results.
4. The laboratory analytical results for 2020.

Thank you for your consideration concerning this summary of groundwater monitoring information. If you have any questions, please do not hesitate to contact me at (575) 393-9174 or Edward Hansen at (505) 920-4965.

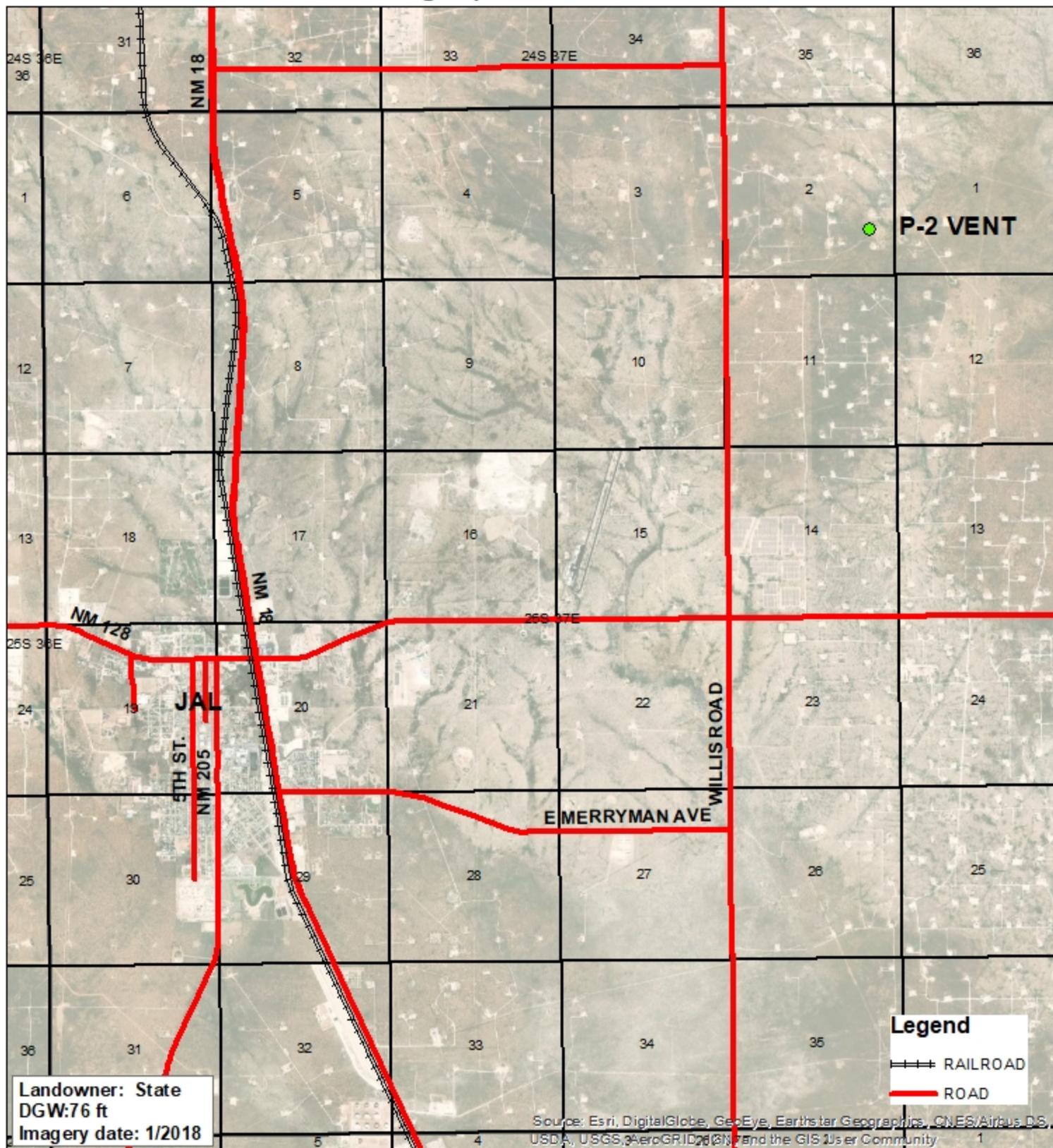
Sincerely,



Katie Davis  
Environmental Manager  
RICE Operating Company (ROC)

Cc – Edward J. Hansen (ROC)

appendix



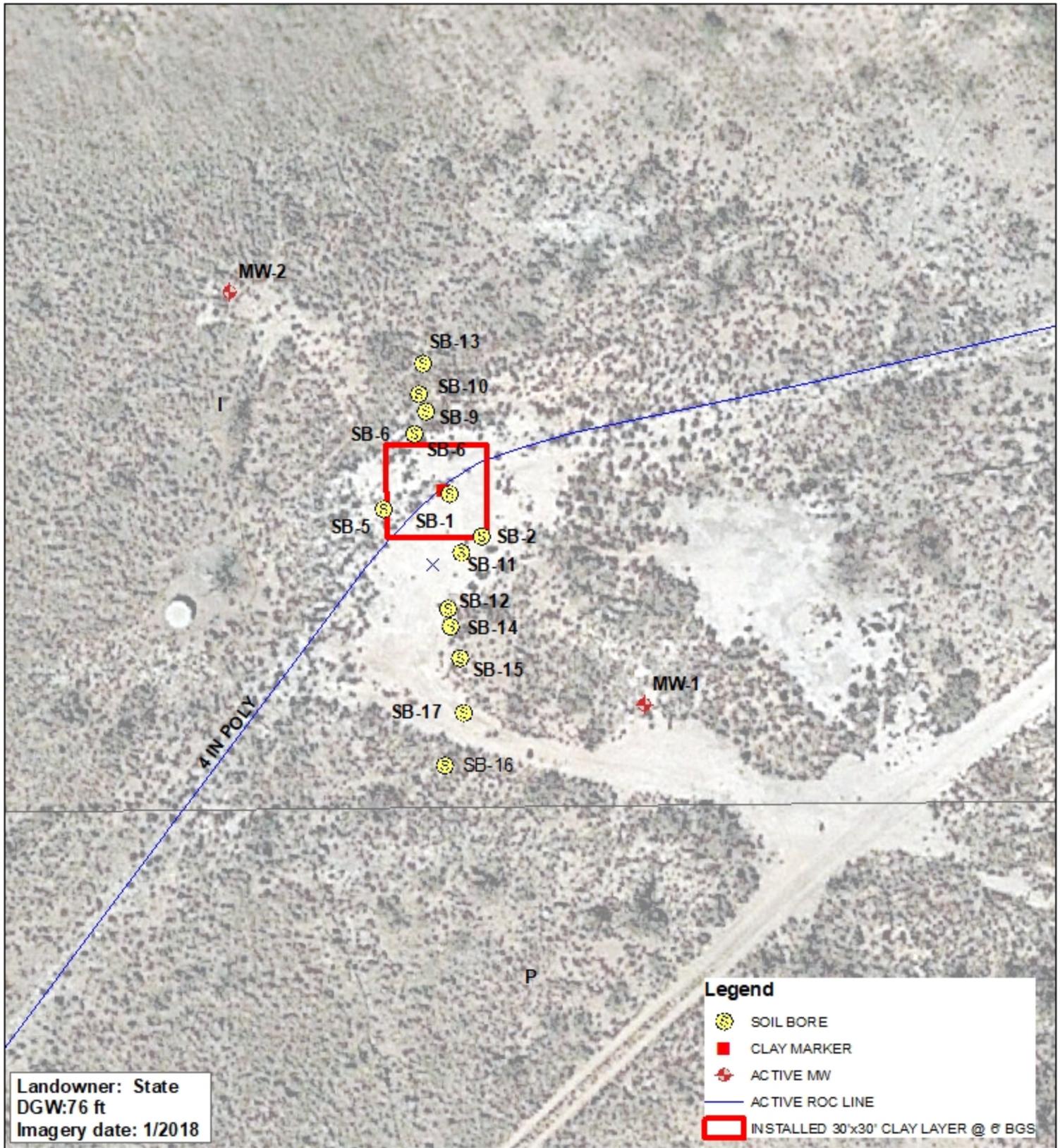
**JUSTIS**  
**P-2 VENT**  
 1R423-18

UL I SECTION 2  
 T-25-S R-37-E  
 LEA COUNTY, NM

GPS: -103.127671 32.155972  
 NAD 83 STATE PLANE PROJECTION  
 NM EAST ZONE

0 2,500 5,000  
 Feet

Drawing date: 3/4/21  
 Drafted by: T. Grieco



Landowner: State  
 DGW: 76 ft  
 Imagery date: 1/2018



**JUSTIS**  
**P-2 VENT**  
 1R423-18

UL I SECTION 2  
 T-25-S R-37-E  
 LEA COUNTY, NM

GPS: -103.127671 32.155972  
 NAD 83 STATE PLANE PROJECTION  
 NM EAST ZONE

0 25 50  
 Feet

Drawing date: 3/8/21  
 Drafted by: T. Grieco

**ROC - Justis P-2 vent (1R423-18)**  
**Unit Letter P, Section 2, T25S, R37E**

MW	Depth to Water	Total Depth	Well Volume	Volume Purged	Sample Date	Cl	TDS	Benzene	Toluene	Ethyl Benzene	Total Xylenes	Sulfate	Comments
1	77.45	88.65	1.8	10	4/11/2010	760	1,740	<0.001	<0.001	<0.001	<0.003	90.7	Clear No odor
1	77.47	88.65	1.8	10	6/3/2010	920	2,940	<0.001	<0.001	<0.001	<0.003	82	Clear No odor
1	77.31	88.65	1.8	10	8/24/2010	1,010	2,110	<0.001	<0.001	<0.001	<0.003	93.1	Clear No odor
1	77.22	88.65	1.8	10	12/1/2010	860	1,650	<0.001	<0.001	<0.001	<0.003	113	Clear No odor
1	76.99	88.65	1.9	10	3/10/2011	900	2,140	<0.001	<0.001	<0.001	<0.003	81.5	Clear No odor
1	76.66	88.65	1.9	10	6/15/2011	960	2,230	<0.001	<0.001	<0.001	<0.003	99.7	Clear No odor
1	76.54	88.65	1.9	10	9/14/2011	1,000	2,320	<0.001	<0.001	<0.001	<0.003	105	Clear No odor
1	76.37	88.65	2	10	12/8/2011	1,120	2,270	<0.001	<0.001	<0.001	<0.003	92.9	Clear No odor
1	76.14	88.65	2	10	3/8/2012	1,040	2,490	<0.001	<0.001	<0.001	<0.003	94.9	Clear No odor
1	75.98	88.65	2	10	6/5/2012	1,240	2,520	<0.001	<0.001	<0.001	<0.003	94.3	Clear No odor
1	75.87	88.65	2	10	9/19/2012	1,240	2,710	<0.001	<0.001	<0.001	<0.003	99.7	Clear No odor
1	75.81	88.65	2.1	10	11/27/2012	1,280	2,510	<0.001	<0.001	<0.001	<0.003	94.6	Clear No odor
1	75.77	88.65	2.1	10	2/27/2013	1,560	2,460	<0.001	<0.001	<0.001	<0.003	107	Clear No odor
1	75.38	88.65	2.1	10	6/14/2013	1,180	2,390	<0.001	<0.001	<0.001	<0.003	99	Clear No odor
1	75.26	88.65	2.1	10	9/12/2013	1,260	2,820	<0.001	<0.001	<0.001	<0.003	74	Clear No odor
1	75.14	88.65	2.2	10	11/21/2013	1,220	2,990	<0.001	<0.001	<0.001	<0.003	104	Clear No odor
1	75.07	88.65	2.2	10	3/18/2014	1,300	2,530	<0.001	<0.001	<0.001	<0.003	90.7	Clear No odor
1	74.86	88.65	2.2	10	6/20/2014	1,040	2,740	<0.001	<0.001	<0.001	<0.003	91.1	Clear No odor
1	74.73	88.65	2.2	10	8/29/2014	1,180	3,040	<0.001	<0.001	<0.001	<0.003	90	Clear No odor
1	74.68	88.65	2.2	10	12/16/2014	1,220	2,560	<0.001	<0.001	<0.001	<0.001	53.4	Clear No odor
1	74.44	88.65	2.3	10	3/11/2015	1,100	2,790	<0.001	<0.001	<0.001	<0.003	65.8	Clear No odor
1	74.23	88.65	2.3	10	6/10/2015	1,140	2,800	<0.001	<0.001	<0.001	<0.003	82.3	Clear No odor
1	74.13	88.65	2.3	10	8/27/2015	1,240	3,300	<0.001	<0.001	<0.001	<0.003	64	Clear No odor
1	73.98	88.65	2.3	10	11/25/2015	1,320	3,220	<0.001	<0.001	<0.001	<0.003	88.4	Clear No odor
1	73.75	88.65	2.3	10	3/23/2016	1,930	3,910	<0.001	<0.001	<0.001	<0.003	79	Clear No odor
1	73.7	88.65	2.4	10	6/7/2016	1,670	3,830	<0.001	<0.001	<0.001	<0.003	101	Clear No odor
1	73.62	88.65	2.4	10	9/19/2016	1,680	4,040	<0.001	<0.001	<0.001	<0.003	97	Clear No odor
1	73.58	88.65	2.4	10	12/2/2016	1,600	3,200	<0.001	<0.001	<0.001	<0.003	135	Clear No odor
1	73.43	88.65	2.4	10	3/10/2017	2,030	3,920	<0.001	<0.001	<0.001	<0.003	92.6	Clear No odor

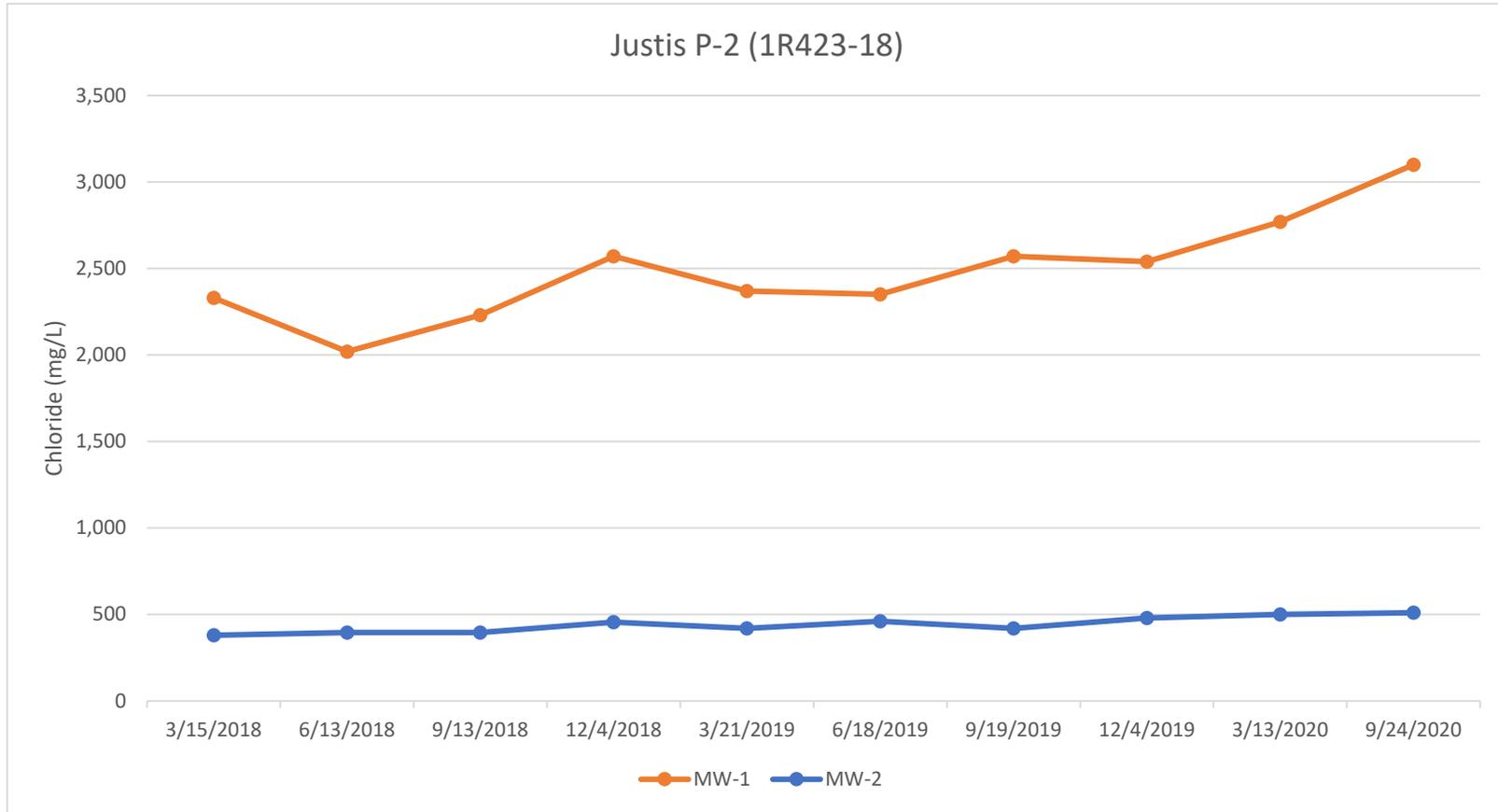
**ROC - Justis P-2 vent (1R423-18)**  
**Unit Letter P, Section 2, T25S, R37E**

MW	Depth to Water	Total Depth	Well Volume	Volume Purged	Sample Date	Cl	TDS	Benzene	Toluene	Ethyl Benzene	Total Xylenes	Sulfate	Comments
1	73.49	88.65	2.4	10	6/20/2017	1,700	4,130	<0.001	<0.001	<0.001	<0.003	82.7	Clear No odor
1	73.2	88.65	2.5	15	9/22/2017	2,030	4,000	<0.001	<0.001	<0.001	<0.003	129	Clear No odor
1	73.08	88.65	2.5	15	12/13/2017	1,940	4,180	<0.001	<0.001	<0.001	<0.003	102	Clear No odor
1	72.92	88.65	2.5	15	3/15/2018	2,330	3,450	<0.001	<0.001	<0.001	<0.003	96	Clear No odor
1	72.78	88.65	2.5	15	6/13/2018	2,020	4,280	<0.001	<0.001	<0.001	<0.003	91	Clear No odor
1	72.69	88.65	2.6	15	9/13/2018	2,230	4,290	<0.001	<0.001	<0.001	<0.003	95	Clear No odor
1	72.58	88.65	2.6	15	12/4/2018	2,570	3,310	<0.001	<0.001	<0.001	<0.003	116	Clear No odor
1	72.44	88.65	2.6	15	3/21/2019	2,370	4,010	<0.001	<0.001	<0.001	<0.003	102	Clear No odor
1	72.4	88.65	2.6	15	6/18/2019	2,350	3,960	<0.001	<0.001	<0.001	<0.003	107	Clear No odor
1	72.42	88.65	2.6	15	9/19/2019	2,570	4,730	<0.001	<0.001	<0.001	<0.003	101	Clear No odor
1	71.96	88.65	2.7	15	12/4/2019	2,540	4,260	<0.001	<0.001	<0.001	<0.003	100	Clear No odor
1	71.92	88.65	2.7	10	3/13/2020	2,770	4,500	<0.001	<0.001	<0.001	<0.003	114	Clear No odor
1	71.59	88.65	2.7	10	9/24/2020	3,100	4,860	XXX	XXX	XXX	XXX	91.8	Clear No odor

MW	Depth to Water	Total Depth	Well Volume	Volume Purged	Sample Date	Cl	TDS	Benzene	Toluene	Ethyl Benzene	Total Xylenes	Sulfate	Comments
2	71.84	93.7	3.5	15	3/8/2012	272	887	<0.001	<0.001	<0.001	<0.003	108	Clear No odor
2	79.74	93.7	2.2	15	6/5/2012	284	876	<0.001	<0.001	<0.001	<0.003	97	Clear No odor
2	79.6	93.7	2.3	15	9/19/2012	452	1,250	<0.001	<0.001	<0.001	<0.003	119	Clear No odor
2	79.61	93.7	2.3	15	11/27/2012	500	1,300	<0.001	<0.001	<0.001	<0.003	108	Clear No odor
2	79.47	93.7	2.3	15	2/27/2013	308	878	<0.001	<0.001	<0.001	<0.003	122	Clear No odor
2	79.14	93.7	2.3	15	6/14/2013	360	1,180	<0.001	<0.001	<0.001	<0.003	127	Clear No odor
2	79.03	93.7	2.3	15	9/12/2013	364	1,160	<0.001	<0.001	<0.001	<0.003	98	Clear No odor
2	78.9	93.7	2.4	15	11/21/2013	450	1,270	<0.001	<0.001	<0.001	<0.003	135	Clear No odor
2	78.81	93.7	2.4	15	3/18/2014	336	910	<0.001	<0.001	<0.001	<0.003	106	Clear No odor
2	78.62	93.7	2.4	15	6/20/2014	268	838	<0.001	<0.001	<0.001	<0.003	89	Clear No odor
2	78.44	93.7	2.4	15	8/29/2014	320	938	<0.001	<0.001	<0.001	<0.003	105	Clear No odor
2	78.37	93.7	2.5	15	12/16/2014	288	920	<0.001	<0.001	<0.001	<0.003	97.3	Clear No odor

**ROC - Justis P-2 vent (1R423-18)**  
**Unit Letter P, Section 2, T25S, R37E**

MW	Depth to Water	Total Depth	Well Volume	Volume Purged	Sample Date	Cl	TDS	Benzene	Toluene	Ethyl Benzene	Total Xylenes	Sulfate	Comments
2	78.16	93.7	2.5	15	3/11/2015	288	854	<0.001	<0.001	<0.001	<0.003	67	Clear No odor
2	78.01	93.7	2.5	15	6/10/2015	388	1,220	<0.001	<0.001	<0.001	<0.003	96	Clear No odor
2	77.89	93.7	2.5	15	8/27/2015	360	1,090	<0.001	<0.001	<0.001	<0.003	77	Clear No odor
2	77.75	93.7	2.6	15	11/25/2015	388	1,000	<0.001	<0.001	<0.001	<0.003	109	Clear No odor
2	77.52	93.7	2.6	15	3/23/2016	352	936	<0.001	<0.001	<0.001	<0.003	98	Clear No odor
2	77.54	93.7	2.6	15	6/7/2016	344	1,020	<0.001	<0.001	<0.001	<0.003	124	Clear No odor
2	77.37	93.7	2.6	15	9/19/2016	376	1,190	<0.001	<0.001	<0.001	<0.003	146	Clear No odor
2	77.33	93.7	2.6	15	12/2/2016	352	916	<0.001	<0.001	<0.001	<0.003	107	Clear No odor
2	77.13	93.7	2.6	15	3/10/2017	340	998	<0.001	<0.001	<0.001	<0.003	106	Clear No odor
2	77.16	93.7	2.6	15	6/20/2017	372	1,100	<0.001	<0.001	<0.001	<0.003	108	Clear No odor
2	76.89	93.7	2.7	15	9/22/2017	256	956	<0.001	<0.001	<0.001	<0.003	106	Clear No odor
2	76.79	93.7	2.7	15	12/13/2017	312	886	<0.001	<0.001	<0.001	<0.003	147	Clear No odor
2	76.63	93.7	2.7	15	3/15/2018	380	986	<0.001	<0.001	<0.001	<0.003	105	Clear No odor
2	76.49	93.7	2.8	15	6/13/2018	396	698	<0.001	<0.001	<0.001	<0.003	109	Clear No odor
2	76.43	93.7	2.8	15	9/13/2018	396	1,200	<0.001	<0.001	<0.001	<0.003	100	Clear No odor
2	76.31	93.7	2.8	15	12/4/2018	456	1,110	<0.001	<0.001	<0.001	<0.003	131	Clear No odor
2	76.15	93.7	2.7	15	3/21/2019	420	1,080	<0.001	<0.001	<0.001	<0.003	99	Clear No odor
2	76.12	93.7	2.8	15	6/18/2019	460	1,280	<0.001	<0.001	<0.001	<0.003	113	Clear No odor
2	76.14	93.7	2.8	15	9/19/2019	420	1,190	<0.001	<0.001	<0.001	<0.003	105	Clear No odor
2	75.71	93.7	2.9	15	12/4/2019	480	1,240	<0.001	<0.001	<0.001	<0.003	114	Clear No odor
2	75.62	93.7	2.9	15	3/13/2020	500	1,080	<0.001	<0.001	<0.001	<0.003	119	Clear No odor
2	75.32	93.7	2.9	15	9/24/2020	510	1,200	XXX	XXX	XXX	XXX	105	Clear No odor





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

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March 24, 2020

KATIE JONES

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: JUSTIS P-2 VENT

Enclosed are the results of analyses for samples received by the laboratory on 03/18/20 15:40.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-19-12. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "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  
 KATIE JONES  
 112 W. Taylor  
 Hobbs NM, 88240  
 Fax To: (575) 397-1471

Received:	03/18/2020	Sampling Date:	03/13/2020
Reported:	03/24/2020	Sampling Type:	Water
Project Name:	JUSTIS P-2 VENT	Sampling Condition:	Cool & Intact
Project Number:	NOT GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	T25S-R37E-SEC2 P-LEA CTY., NM		

**Sample ID: MONITOR WELL #1 (H000846-01)**

BTEX 8021B		mg/L		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.001	0.001	03/20/2020	ND	0.020	102	0.0200	0.694	
Toluene*	<0.001	0.001	03/20/2020	ND	0.020	99.6	0.0200	1.42	
Ethylbenzene*	<0.001	0.001	03/20/2020	ND	0.020	101	0.0200	1.17	
Total Xylenes*	<0.003	0.003	03/20/2020	ND	0.059	98.4	0.0600	0.916	
Total BTEX	<0.006	0.006	03/20/2020	ND					

Surrogate: 4-Bromofluorobenzene (PID) 102 % 58.2-133

Chloride, SM4500Cl-B		mg/L		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride*	2770	4.00	03/19/2020	ND	100	100	100	0.00	

Sulfate 375.4		mg/L		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Sulfate*	114	25.0	03/19/2020	ND	21.6	108	20.0	10.1	

TDS 160.1		mg/L		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
TDS*	4500	5.00	03/23/2020	ND	547	109	500	2.80	

Cardinal Laboratories

\* = Accredited Analyte

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

Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received:	03/18/2020	Sampling Date:	03/13/2020
Reported:	03/24/2020	Sampling Type:	Water
Project Name:	JUSTIS P-2 VENT	Sampling Condition:	Cool & Intact
Project Number:	NOT GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	T25S-R37E-SEC2 P-LEA CTY., NM		

**Sample ID: MONITOR WELL #2 (H000846-02)**

BTEX 8021B		mg/L		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.001	0.001	03/20/2020	ND	0.020	102	0.0200	0.694	
Toluene*	<0.001	0.001	03/20/2020	ND	0.020	99.6	0.0200	1.42	
Ethylbenzene*	<0.001	0.001	03/20/2020	ND	0.020	101	0.0200	1.17	
Total Xylenes*	<0.003	0.003	03/20/2020	ND	0.059	98.4	0.0600	0.916	
Total BTEX	<0.006	0.006	03/20/2020	ND					

Surrogate: 4-Bromofluorobenzene (PID) 102 % 58.2-133

Chloride, SM4500Cl-B		mg/L		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride*	500	4.00	03/19/2020	ND	100	100	100	0.00	

Sulfate 375.4		mg/L		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Sulfate*	119	25.0	03/19/2020	ND	21.6	108	20.0	10.1	

TDS 160.1		mg/L		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
TDS*	1080	5.00	03/23/2020	ND	547	109	500	2.80	

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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**Notes and Definitions**

- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- \*\* Samples not received at proper temperature of 6°C or below.
- \*\*\* Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C  
Samples reported on an as received basis (wet) unless otherwise noted on report

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Celey D. Keene, Lab Director/Quality Manager





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October 05, 2020

KATIE JONES

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: JUSTIS P-2 VENT

Enclosed are the results of analyses for samples received by the laboratory on 09/28/20 14:25.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-20-13. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene".

Celey D. Keene

Lab Director/Quality Manager



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**Analytical Results For:**

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

Received:	09/28/2020	Sampling Date:	09/24/2020
Reported:	10/05/2020	Sampling Type:	Water
Project Name:	JUSTIS P-2 VENT	Sampling Condition:	Cool & Intact
Project Number:	NOT GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	T25S-R37E-SEC2 P-LEA CTY., NM		

**Sample ID: MONITOR WELL #1 (H002560-01)**

Chloride, SM4500Cl-B		mg/L		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Chloride*</b>	<b>3100</b>	4.00	09/29/2020	ND	100	100	100	3.92	QM-07	
Sulfate 375.4		mg/L		Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Sulfate*</b>	<b>91.8</b>	25.0	09/30/2020	ND	18.4	92.2	20.0	11.6		
TDS 160.1		mg/L		Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>TDS*</b>	<b>4860</b>	5.00	10/02/2020	ND	535	107	500	1.08		

**Sample ID: MONITOR WELL #2 (H002560-02)**

Chloride, SM4500Cl-B		mg/L		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Chloride*</b>	<b>510</b>	4.00	09/29/2020	ND	100	100	100	3.92		
Sulfate 375.4		mg/L		Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Sulfate*</b>	<b>105</b>	25.0	09/30/2020	ND	18.4	92.2	20.0	11.6		
TDS 160.1		mg/L		Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>TDS*</b>	<b>1200</b>	5.00	10/02/2020	ND	535	107	500	1.08		

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Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

- QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- \*\* Samples not received at proper temperature of 6°C or below.
- \*\*\* Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C  
Samples reported on an as received basis (wet) unless otherwise noted on report

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*Celey D. Keene*

Celey D. Keene, Lab Director/Quality Manager



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**District IV**  
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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

CONDITIONS  
 Action 24233

**CONDITIONS**

Operator: RICE OPERATING COMPANY 122 W Taylor Hobbs, NM 88240	OGRID: 19174
	Action Number: 24233
	Action Type: [UF-GWA] Ground Water Abatement (GROUND WATER ABATEMENT)

**CONDITIONS**

Created By	Condition	Condition Date
nvelez	Review of 2020 Annual Groundwater Report: Content satisfactory 1. Continue sampling on a quarterly schedule 2. OCD pre-approves the elimination of BTEX and sulfate from further laboratory analysis. 3. Submit summarized activities completed and their results in a 2021 Annual Report. Submittal to OCD expected no later than March 31,2022. 4. OCD requires an abatement plan be submitted for pre-approval to address the source and down gradient areas to effectively reduce chloride & total dissolved solids (TDS) in groundwater. OCD suggest arranging a meeting to discuss alternative methods in order to mitigate the elevated values.	2/2/2022