112 West Taylor • Hobbs, New Mexico 88240 Phone: (575) 393-9174 • Fax: (575) 397-1471

**April 1, 2025** 

### Michael Buchanan

Environmental Bureau, Oil Conservation Division New Mexico Energy, Minerals, & Natural Resources Department 1220 S. St. Francis Drive Santa Fe, New Mexico 87505

RE: 2024 Annual Groundwater Report Rice Operating Company – BD SWD System BD L-36 EOL (1R426-278): UL/L, Sec. 36, T21S, R37E NMOCD Incident ID: nAPP2110356466

Mr. Buchanan:

ROC is the service provider (agent) for the BD SWD System and has no ownership of any portion of the pipeline, well, or facility. The system is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis.

### **Background and Previous Work**

The site is located approximately 2 miles east of Eunice, New Mexico at UL/L, Sec. 36, T21S, R37E as shown on the Geographic Location Map. Groundwater sampling at the site indicated the depth to groundwater is approximately 45 feet below ground surface (bgs).

An Investigation and Characterization Plan (ICP) was submitted to NMOCD on April 24<sup>th</sup>, 2015 and approved May 7<sup>th</sup>, 2015. The site was investigated through soil bore installation resulting in elevated chloride concentrations that decreased with depth.

A Corrective Action Plan (CAP) and Addendum was submitted and approved by NMOCD on October 30<sup>th</sup>, 2017. According to the NMOCD approved CAP, a 91x31-ft 20-mil reinforced liner was installed and properly seated at 4.5 ft bgs which covered the previously installed 20x20 ft clay liner. The site was backfilled and seeded with a blend of native vegetation. A CAP Report and Soil Closure Request detailing this work was submitted to the NMOCD on May 17<sup>th</sup>, 2018. The report also requested three monitoring wells be installed near the source, up-gradient and down-gradient of the site. NMOCD approved this report and granted 'Soil Closure' on June 20<sup>th</sup>, 2018.

On June 27<sup>th</sup>, 2019, a near-source well (MW-1) was installed approximately 40 ft southeast of the source, and lithology soil samples were collected at regular intervals. The well was developed and sampled regularly. On November 13<sup>th</sup>, 2019, an up-gradient well (MW-2) and a down-gradient well (MW-3) were installed.

The most recent sampling event resulted in a chloride concentration of 980 mg/L in MW-1, 510 mg/L in MW-2, and 500 mg/L in MW-3. 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. The highest chloride observed in the up-gradient well (MW-2) resulted in a concentration of 600 mg/L on May 3<sup>rd</sup>, 2022. Based on the non-ROC up-gradient source contributing to the degradation of groundwater quality, ROC submitted a Termination Request to NMOCD on August 22<sup>nd</sup>, 2022. NMOCD granted approval on March 1<sup>st</sup>, 2024, citing that all revegetation activities will need to be documented and included in the revegetation report. ROC suspended groundwater monitoring from MW-1, MW-2, and MW-3. On July 9<sup>th</sup>, 2024, ROC submitted via email the soil closure documentation previously submitted to NMOCD. The submission included the CAP Report and Soil Closure Request previously submitted on May 17<sup>th</sup>, 2018, NMOCD's June 20<sup>th</sup>, 2018, approval granting soil closure, and a recent photo showing from July 9<sup>th</sup>, 2024, showing the revegetation.

Attached is the Appendix, which contains:

- 1. NMOCD approval of the Termination Request.
- 2. A Geographic Location Map.
- 3. An Area Map.
- 4. A map showing monitoring well locations and estimated groundwater gradient (generated by Peter Galusky of Terrae LLC).
- 5. A graph showing laboratory results, and a table presenting all laboratory results and depth to groundwater for each well at the site.
- 6. The laboratory analytical result for 2024.
- 7. Soil Closure Documentation follow up email communication, recent photo, NMOCD approval of soil closure, and CAP Report and Soil Closure Request.

Rice Operating Company appreciates the opportunity to work with you on this project. Please contact me at (575) 393-9174 if you have any questions or wish to further discuss this site. Thank you for your time and consideration.

Sincerely,

Katie Davis

Environmental Manager

Katy Davis

RICE Operating Company (ROC)

appendix

From: OCDOnline@state.nm.us

To: <u>Katie Jones</u>

Subject: The Oil Conservation Division (OCD) has approved the application, Application ID: 136521

**Date:** Friday, March 01, 2024 2:44:13 PM

To whom it may concern (c/o Katie Davis for RICE OPERATING COMPANY),

The OCD has approved the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAPP2110356466, with the following conditions:

• Closure Report Approved. All revegetation activities will need to be documented and included in the revegetation report. The revegetation report will need to include: An executive summary of the revegetation activities including: Seed mix, Method of seeding, dates of when the release area was reseeded, information pertinent to inspections, information about any amendments added to the soil, information on how the vegetative cover established meets the life-form ratio of plus or minus fifty percent of pre-disturbance levels and a total percent plant cover of at least seventy percent of pre-disturbance levels, excluding noxious weeds per 19.15.29.13 D.(3) NMAC, and any additional information; a scaled Site Map including area that was revegetated in square feet; and pictures of the revegetated areas during reseeding activities, inspections, and final pictures when revegetation is achieved.

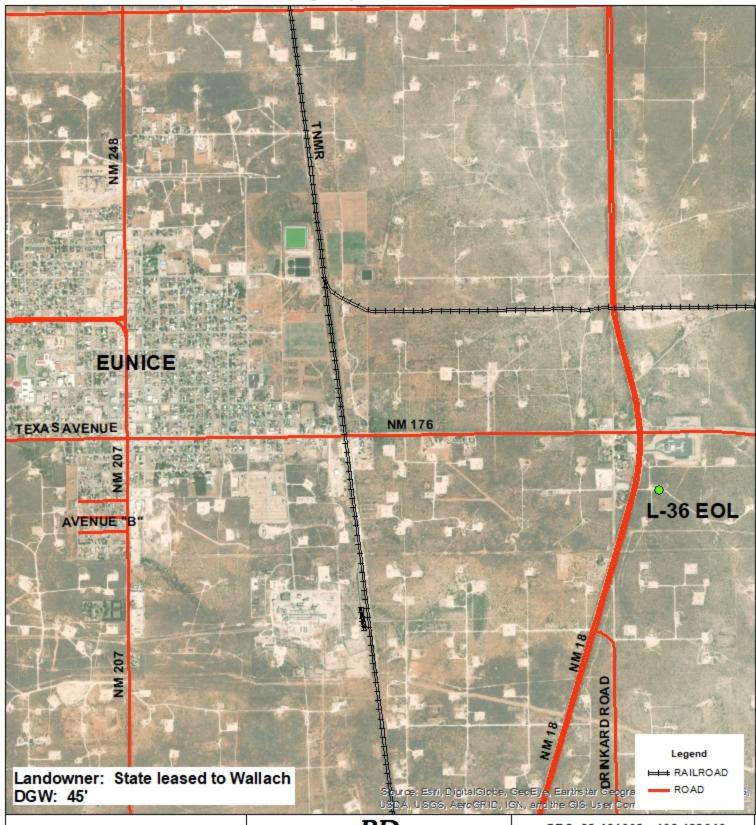
The signed C-141 can be found in the OCD Online: Imaging under the incident ID (n#).

If you have any questions regarding this application, please contact me.

Thank you, Michael Buchanan Environmental Specialist 505-490-0798 Michael.Buchanan@emnrd.nm.gov

New Mexico Energy, Minerals and Natural Resources Department 1220 South St. Francis Drive Santa Fe, NM 87505

### Geographic Location





BDL-36 EOL 1R426-278

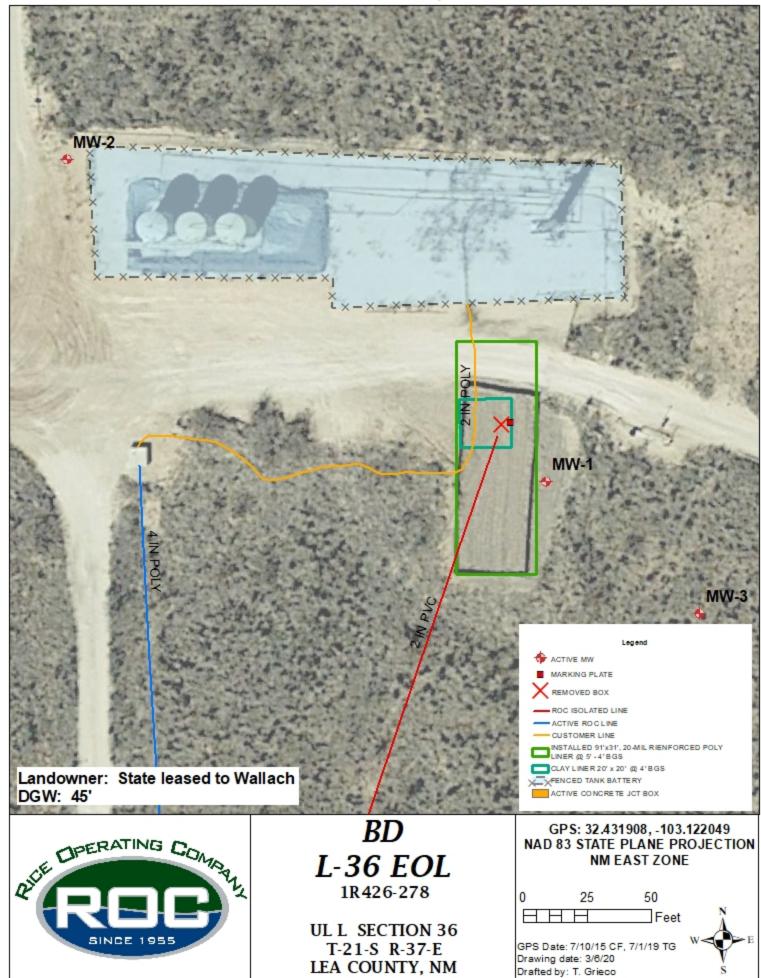
UL L SECTION 36 T-21-S R-37-E LEA COUNTY, NM

GPS: 32.431908, -103.122049 NAD 83 STATE PLANE PROJECTION NM EAST ZONE

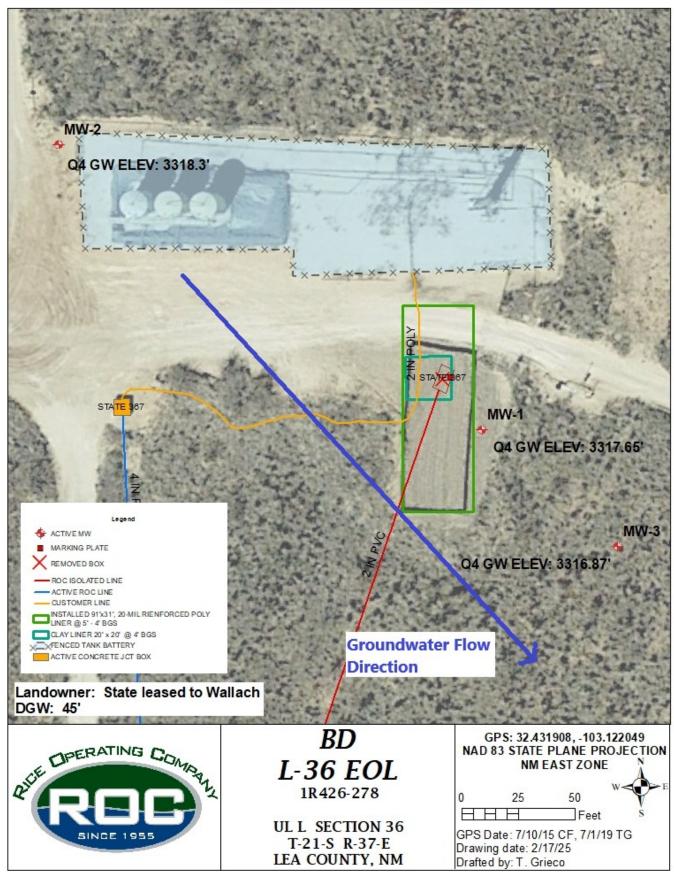
1,000 2,000

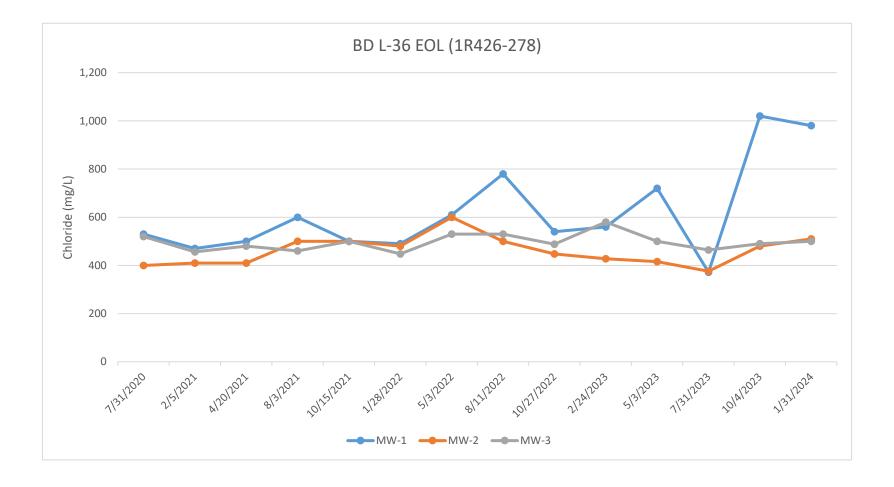
GPS Date: 7/10/15 CF, 7/1/19 TG

Drawing date: 3/6/20 Drafted by: T. Grieco



### **Groundwater Flow Direction**





ROC - BD L-36 EOL (1R426-278) Unit Letter L, Section 36, T21S, R37E

| MW | Depth to | Total | Well   | Volume | Sample Date | Cl    | TDS   | Benzene | Toluene | Ethyl   | Total   | Sulfate | Comments      |
|----|----------|-------|--------|--------|-------------|-------|-------|---------|---------|---------|---------|---------|---------------|
|    | Water    | Depth | Volume | Purged |             |       |       |         |         | Benzene | Xylenes |         |               |
| 1  | 45.58    | 88.6  | 28     | 100    | 7/23/2019   | 490   | 2,010 | <0.001  | <0.001  | <0.001  | <0.003  | 560     | Clear No odor |
| 1  | 45.53    | 88.6  | 28     | 100    | 10/22/2019  | 550   | 1,840 | <0.001  | <0.001  | <0.001  | <0.003  | 602     | Clear No odor |
| 1  | 45.41    | 88.6  | 28     | 90     | 2/7/2020    | 580   | 2,180 | <0.001  | <0.001  | <0.001  | <0.003  | 536     | Clear No odor |
| 1  | 45.35    | 88.6  | 28     | 90     | 7/31/2020   | 530   | 2,080 | <0.001  | <0.001  | <0.001  | <0.003  | 407     | Clear No odor |
| 1  | 45.36    | 88.6  | 28     | 90     | 2/5/2021    | 470   | 1,930 | <0.001  | <0.001  | <0.001  | <0.003  | 521     | Clear No odor |
| 1  | 45.3     | 88.6  | 28     | 90     | 4/20/2021   | 500   | 1,990 | <0.001  | <0.001  | <0.001  | <0.003  | 468     | Clear No odor |
| 1  | 45.27    | 88.6  | 28     | 90     | 8/3/2021    | 600   | 2,160 | <0.001  | <0.001  | <0.001  | <0.003  | 679     | Clear No odor |
| 1  | 45.23    | 88.6  | 28     | 90     | 10/15/2021  | 500   | 1,960 | <0.001  | <0.001  | <0.001  | <0.003  | 435     | Clear No odor |
| 1  | 44.18    | 88.6  | 28     | 90     | 1/28/2022   | 490   | 1,930 | <0.001  | <0.001  | <0.001  | <0.003  | 625     | Clear No odor |
| 1  | 45.13    | 88.6  | 28     | 90     | 5/3/2022    | 610   | 2,120 | <0.001  | <0.001  | <0.001  | <0.003  | 516     | Clear No odor |
| 1  | 45.29    | 88.6  | 28     | 90     | 8/11/2022   | 780   | 2,400 | <0.001  | <0.001  | <0.001  | <0.003  | 693     | Clear No odor |
| 1  | 45.27    | 88.6  | 28     | 90     | 10/27/2022  | 540   | 1,360 | <0.001  | <0.001  | <0.001  | <0.003  | 207     | Clear No odor |
| 1  | 45.14    | 88.6  | 28     | 90     | 2/24/2023   | 560   | 2,010 | <0.001  | <0.001  | <0.001  | <0.003  | 608     | Clear No odor |
| 1  | 45.15    | 88.6  | 28     | 90     | 5/3/2023    | 720   | 2,270 | <0.001  | <0.001  | <0.001  | <0.003  | 521     | Clear No odor |
| 1  | 45.15    | 88.6  | 28     | 90     | 7/31/2023   | 372   | 2,040 | <0.001  | <0.001  | <0.001  | <0.003  | 526     | Clear No odor |
| 1  | 45.24    | 88.6  | 28     | 90     | 10/4/2023   | 1,020 | 2,460 | <0.001  | <0.001  | <0.001  | <0.003  | 497     | Clear No odor |
| 1  | 45.15    | 88.6  | 28     | 90     | 1/31/2024   | 980   | 2,740 | <0.001  | <0.001  | <0.001  | <0.003  | 586     | Clear No odor |

| MW    | Depth to | Total | Well   | Volume | Sample Date | Cl  | TDS   | Benzene   | Toluene  | Ethyl   | Total   | Sulfate | Comments      |
|-------|----------|-------|--------|--------|-------------|-----|-------|-----------|----------|---------|---------|---------|---------------|
| IVIVV | Water    | Depth | Volume | Purged | Sample Date | Ci  | 103   | belizelle | Toluelle | Benzene | Xylenes | Juliate | Comments      |
| 2     | 47.78    | 63.75 | 2.6    | 10     | 12/16/2019  | 360 | 1,690 | <0.001    | <0.001   | <0.001  | <0.003  | 510     | Clear No odor |
| 2     | 47.72    | 63.75 | 2.6    | 10     | 2/7/2020    | 412 | 1,680 | <0.001    | <0.001   | <0.001  | <0.003  | 480     | Clear No odor |
| 2     | 47.69    | 63.75 | 2.6    | 10     | 7/31/2020   | 400 | 1,790 | <0.001    | <0.001   | <0.001  | <0.003  | 319     | Clear No odor |
| 2     | 47.73    | 63.75 | 2.6    | 10     | 2/5/2021    | 410 | 1,750 | <0.001    | <0.001   | <0.001  | <0.003  | 521     | Clear No odor |
| 2     | 47.63    | 63.75 | 2.6    | 10     | 4/20/2021   | 410 | 1,440 | <0.001    | <0.001   | <0.001  | <0.003  | 475     | Clear No odor |
| 2     | 47.62    | 63.75 | 2.6    | 10     | 8/3/2021    | 500 | 1,930 | <0.001    | <0.001   | <0.001  | <0.003  | 624     | Clear No odor |
| 2     | 47.58    | 63.75 | 2.6    | 10     | 10/15/2021  | 500 | 1,900 | <0.001    | <0.001   | <0.001  | <0.003  | 357     | Clear No odor |

ROC - BD L-36 EOL (1R426-278) Unit Letter L, Section 36, T21S, R37E

| MW    | Depth to | Total | Well   | Volume | Sample Date | Cl  | TDS   | Benzene   | Toluene  | Ethyl   | Total   | Sulfate | Comments      |
|-------|----------|-------|--------|--------|-------------|-----|-------|-----------|----------|---------|---------|---------|---------------|
| IVIVV | Water    | Depth | Volume | Purged | Sample Date | Ci  | 103   | Delizelle | Toluelle | Benzene | Xylenes | Juliate | Comments      |
| 2     | 47.51    | 63.75 | 2.6    | 10     | 1/28/2022   | 480 | 1,850 | <0.001    | <0.001   | <0.001  | <0.003  | 618     | Clear No odor |
| 2     | 47.44    | 63.75 | 2.6    | 10     | 5/3/2022    | 600 | 2,100 | <0.001    | <0.001   | <0.001  | <0.003  | 560     | Clear No odor |
| 2     | 47.62    | 63.75 | 2.6    | 10     | 8/11/2022   | 500 | 1,910 | <0.001    | <0.001   | <0.001  | <0.003  | 539     | Clear No odor |
| 2     | 47.54    | 63.75 | 2.6    | 10     | 10/27/2022  | 448 | 1,810 | <0.001    | <0.001   | <0.001  | <0.003  | 593     | Clear No odor |
| 2     | 47.5     | 63.75 | 2.6    | 10     | 2/24/2023   | 428 | 1,740 | <0.001    | <0.001   | <0.001  | <0.003  | 504     | Clear No odor |
| 2     | 47.5     | 63.75 | 2.6    | 10     | 5/3/2023    | 416 | 1,670 | <0.001    | <0.001   | <0.001  | <0.003  | 456     | Clear No odor |
| 2     | 47.51    | 63.75 | 2.6    | 10     | 7/31/2023   | 376 | 1,550 | <0.001    | <0.001   | <0.001  | <0.003  | 480     | Clear No odor |
| 2     | 47.6     | 63.75 | 2.6    | 10     | 10/4/2023   | 480 | 1,920 | <0.001    | <0.001   | <0.001  | <0.003  | 627     | Clear No odor |
| 2     | 47.5     | 63.75 | 2.6    | 10     | 1/31/2024   | 510 | 1,520 | <0.001    | <0.001   | <0.001  | <0.003  | 357     | Clear No odor |

| MW | Depth to<br>Water | Total<br>Depth | Well<br>Volume | Volume<br>Purged | Sample Date | Cl    | TDS   | Benzene | Toluene | Ethyl<br>Benzene | Total<br>Xylenes | Sulfate | Comments      |
|----|-------------------|----------------|----------------|------------------|-------------|-------|-------|---------|---------|------------------|------------------|---------|---------------|
| 3  | 43.94             | 63.93          | 3.2            | 10               | 12/16/2019  | 1,010 | 2,940 | <0.001  | <0.001  | <0.001           | <0.003           | 557     | Clear No odor |
| 3  | 43.9              | 63.93          | 3.2            | 10               | 2/7/2020    | 540   | 2,100 | <0.001  | <0.001  | <0.001           | <0.003           | 552     | Clear No odor |
| 3  | 43.88             | 63.93          | 3.2            | 10               | 7/31/2020   | 520   | 2,000 | <0.001  | <0.001  | <0.001           | <0.003           | 324     | Clear No odor |
| 3  | 43.84             | 63.93          | 3.2            | 12               | 2/5/2021    | 456   | 1,880 | <0.001  | <0.001  | <0.001           | <0.003           | 522     | Clear No odor |
| 3  | 43.78             | 63.93          | 3.2            | 12               | 4/20/2021   | 480   | 1,830 | <0.001  | <0.001  | <0.001           | <0.003           | 464     | Clear No odor |
| 3  | 43.77             | 63.93          | 3.2            | 12               | 8/3/2021    | 460   | 1,920 | <0.001  | <0.001  | <0.001           | <0.003           | 639     | Clear No odor |
| 3  | 43.72             | 63.93          | 3.2            | 12               | 10/15/2021  | 500   | 1,960 | <0.001  | <0.001  | <0.001           | <0.003           | 406     | Clear No odor |
| 3  | 43.63             | 63.93          | 3.2            | 12               | 1/28/2022   | 448   | 1,910 | <0.001  | <0.001  | <0.001           | <0.003           | 640     | Clear No odor |
| 3  | 43.59             | 63.93          | 3.3            | 12               | 5/3/2022    | 530   | 1,960 | <0.001  | <0.001  | <0.001           | <0.003           | 532     | Clear No odor |
| 3  | 43.8              | 63.93          | 3.2            | 12               | 8/11/2022   | 530   | 1,970 | <0.001  | <0.001  | <0.001           | <0.003           | 509     | Clear No odor |
| 3  | 43.78             | 63.93          | 3.2            | 12               | 10/27/2022  | 488   | 1,960 | <0.001  | <0.001  | <0.001           | <0.003           | 515     | Clear No odor |
| 3  | 43.62             | 63.93          | 3.2            | 10               | 2/24/2023   | 580   | 1,970 | <0.001  | <0.001  | <0.001           | <0.003           | 501     | Clear No odor |
| 3  | 43.62             | 63.93          | 3.2            | 10               | 5/3/2023    | 500   | 2,000 | <0.001  | <0.001  | <0.001           | <0.003           | 561     | Clear No odor |
| 3  | 43.63             | 63.93          | 3.2            | 10               | 7/31/2023   | 464   | 1,960 | <0.001  | <0.001  | <0.001           | <0.003           | 555     | Clear No odor |
| 3  | 43.72             | 63.93          | 3.2            | 10               | 10/4/2023   | 490   | 1,870 | <0.001  | <0.001  | <0.001           | <0.003           | 666     | Clear No odor |
| 3  | 43.63             | 63.93          | 3.2            | 10               | 1/31/2024   | 500   | 1,900 | <0.001  | <0.001  | <0.001           | <0.003           | 563     | Clear No odor |



February 07, 2024

KATIE JONES

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: BD L-36 EOL

Enclosed are the results of analyses for samples received by the laboratory on 02/01/24 9:30.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-23-16. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at <a href="https://www.tceq.texas.gov/field/ga/lab\_accred\_certif.html">www.tceq.texas.gov/field/ga/lab\_accred\_certif.html</a>.

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

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

Celey D. Keine

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,

Celey D. Keene

Lab Director/Quality Manager



### Analytical Results For:

Rice Operating Company KATIE JONES 112 W. Taylor Hobbs NM, 88240

Fax To: (575) 397-1471

Received: 02/01/2024 Sampling Date: 01/31/2024
Reported: 02/07/2024 Sampling Type: Water

Project Name: BD L-36 EOL Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Shalyn Rodriguez

Analyzed By: JH

Project Location: T21S R37E SEC 36 L ~ LEA COUNTY NM

mg/L

### Sample ID: MONITOR WELL #1 (H240465-01)

BTEX 8021B

| DILXOULID                            | 11197   | -               | Alluly20   | u Dy. 311    |       |            |               |       |           |
|--------------------------------------|---------|-----------------|------------|--------------|-------|------------|---------------|-------|-----------|
| Analyte                              | Result  | Reporting Limit | Analyzed   | Method Blank | BS    | % Recovery | True Value QC | RPD   | Qualifier |
| Benzene*                             | <0.001  | 0.001           | 02/05/2024 | ND           | 0.018 | 91.5       | 0.0200        | 6.48  |           |
| Toluene*                             | <0.001  | 0.001           | 02/05/2024 | ND           | 0.020 | 99.5       | 0.0200        | 4.37  |           |
| Ethylbenzene*                        | < 0.001 | 0.001           | 02/05/2024 | ND           | 0.020 | 99.0       | 0.0200        | 4.26  |           |
| Total Xylenes*                       | <0.003  | 0.003           | 02/05/2024 | ND           | 0.059 | 98.4       | 0.0600        | 3.73  |           |
| Total BTEX                           | <0.006  | 0.006           | 02/05/2024 | ND           |       |            |               |       |           |
| Surrogate: 4-Bromofluorobenzene (PID | 98.6    | % 77.5-12       | 5          |              |       |            |               |       |           |
| Chloride, SM4500CI-B                 | mg/     | L               | Analyze    | d By: CT     |       |            |               |       |           |
| Analyte                              | Result  | Reporting Limit | Analyzed   | Method Blank | BS    | % Recovery | True Value QC | RPD   | Qualifier |
| Chloride*                            | 980     | 4.00            | 02/01/2024 | ND           | 104   | 104        | 100           | 0.00  |           |
| Sulfate 375.4                        | mg/     | L               | Analyze    | d By: AC     |       |            |               |       |           |
| Analyte                              | Result  | Reporting Limit | Analyzed   | Method Blank | BS    | % Recovery | True Value QC | RPD   | Qualifier |
| Sulfate*                             | 586     | 125             | 02/01/2024 | ND           | 20.9  | 105        | 20.0          | 4.64  |           |
| TDS 160.1                            | mg/     | L               | Analyze    | d By: CT     |       |            |               |       |           |
| Analyte                              | Result  | Reporting Limit | Analyzed   | Method Blank | BS    | % Recovery | True Value QC | RPD   | Qualifier |
| TDS*                                 | 2740    | 5.00            | 02/05/2024 | ND           | 516   | 103        | 500           | 0.491 |           |
|                                      |         |                 |            |              |       |            |               |       |           |

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 whistoever 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 related only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene



### Analytical Results For:

Rice Operating Company KATIE JONES 112 W. Taylor Hobbs NM, 88240

Fax To: (575) 397-1471

Received: 02/01/2024 Sampling Date: 01/31/2024 Reported: 02/07/2024 Sampling Type: Water Project Name: BD L-36 EOL Sampling Condition: Cool & Intact Sample Received By: Project Number: NONE GIVEN Shalyn Rodriguez

Analyzed By: JH

Project Location: T21S R37E SEC 36 L ~ LEA COUNTY NM

### Sample ID: MONITOR WELL #2 (H240465-02)

BTEX 8021B

| Analyte                              | Result  | Reporting Limit | Analyzed   | Method Blank | BS    | % Recovery | True Value QC | RPD   | Qualifier |
|--------------------------------------|---------|-----------------|------------|--------------|-------|------------|---------------|-------|-----------|
| Benzene*                             | <0.001  | 0.001           | 02/05/2024 | ND           | 0.018 | 91.5       | 0.0200        | 6.48  |           |
| Toluene*                             | < 0.001 | 0.001           | 02/05/2024 | ND           | 0.020 | 99.5       | 0.0200        | 4.37  |           |
| Ethylbenzene*                        | < 0.001 | 0.001           | 02/05/2024 | ND           | 0.020 | 99.0       | 0.0200        | 4.26  |           |
| Total Xylenes*                       | <0.003  | 0.003           | 02/05/2024 | ND           | 0.059 | 98.4       | 0.0600        | 3.73  |           |
| Total BTEX                           | <0.006  | 0.006           | 02/05/2024 | ND           |       |            |               |       |           |
| Surrogate: 4-Bromofluorobenzene (PID | 96.69   | % 77.5-12       | 25         |              |       |            |               |       |           |
| Chloride, SM4500Cl-B                 | mg/     | L               | Analyze    | d By: CT     |       |            |               |       |           |
| Analyte                              | Result  | Reporting Limit | Analyzed   | Method Blank | BS    | % Recovery | True Value QC | RPD   | Qualifier |
| Chloride*                            | 510     | 4.00            | 02/01/2024 | ND           | 104   | 104        | 100           | 0.00  |           |
| Sulfate 375.4                        | mg/     | L               | Analyze    | d By: AC     |       |            |               |       |           |
| Analyte                              | Result  | Reporting Limit | Analyzed   | Method Blank | BS    | % Recovery | True Value QC | RPD   | Qualifier |
| Sulfate*                             | 357     | 125             | 02/01/2024 | ND           | 20.9  | 105        | 20.0          | 4.64  |           |
| TDS 160.1                            | mg/     | L               | Analyze    | d By: CT     |       |            |               |       |           |
| Analyte                              | Result  | Reporting Limit | Analyzed   | Method Blank | BS    | % Recovery | True Value QC | RPD   | Qualifier |
| TDS*                                 | 1520    | 5.00            | 02/05/2024 | ND           | 516   | 103        | 500           | 0.491 |           |
|                                      |         |                 |            |              |       |            |               |       |           |

Cardinal Laboratories \*=Accredited Analyte

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Celey D. Keene



### Analytical Results For:

Rice Operating Company KATIE JONES 112 W. Taylor Hobbs NM, 88240

Fax To: (575) 397-1471

Received: 02/01/2024 Sampling Date: 01/31/2024 Reported: 02/07/2024 Sampling Type: Water Project Name: BD L-36 EOL Sampling Condition: Cool & Intact Sample Received By: Project Number: NONE GIVEN Shalyn Rodriguez

Analyzed By: JH

Project Location: T21S R37E SEC 36 L  $\sim$  LEA COUNTY NM

### Sample ID: MONITOR WELL #3 (H240465-03)

BTEX 8021B

| Analyte                              | Result  | Reporting Limit | Analyzed   | Method Blank | BS    | % Recovery | True Value QC | RPD   | Qualifier |
|--------------------------------------|---------|-----------------|------------|--------------|-------|------------|---------------|-------|-----------|
| Benzene*                             | < 0.001 | 0.001           | 02/05/2024 | ND           | 0.018 | 91.5       | 0.0200        | 6.48  |           |
| Toluene*                             | < 0.001 | 0.001           | 02/05/2024 | ND           | 0.020 | 99.5       | 0.0200        | 4.37  |           |
| Ethylbenzene*                        | < 0.001 | 0.001           | 02/05/2024 | ND           | 0.020 | 99.0       | 0.0200        | 4.26  |           |
| Total Xylenes*                       | <0.003  | 0.003           | 02/05/2024 | ND           | 0.059 | 98.4       | 0.0600        | 3.73  |           |
| Total BTEX                           | <0.006  | 0.006           | 02/05/2024 | ND           |       |            |               |       |           |
| Surrogate: 4-Bromofluorobenzene (PID | 93.4    | % 77.5-12       | 5          |              |       |            |               |       |           |
| Chloride, SM4500Cl-B                 | mg/     | L               | Analyze    | d By: CT     |       |            |               |       |           |
| Analyte                              | Result  | Reporting Limit | Analyzed   | Method Blank | BS    | % Recovery | True Value QC | RPD   | Qualifier |
| Chloride*                            | 500     | 4.00            | 02/01/2024 | ND           | 104   | 104        | 100           | 0.00  |           |
| Sulfate 375.4                        | mg/     | L               | Analyze    | d By: AC     |       |            |               |       |           |
| Analyte                              | Result  | Reporting Limit | Analyzed   | Method Blank | BS    | % Recovery | True Value QC | RPD   | Qualifier |
| Sulfate*                             | 563     | 125             | 02/01/2024 | ND           | 20.9  | 105        | 20.0          | 4.64  |           |
| TDS 160.1                            | mg/     | L               | Analyze    | d By: CT     |       |            |               |       |           |
| Analyte                              | Result  | Reporting Limit | Analyzed   | Method Blank | BS    | % Recovery | True Value QC | RPD   | Qualifier |
| TDS*                                 | 1900    | 5.00            | 02/05/2024 | ND           | 516   | 103        | 500           | 0.491 |           |
|                                      |         |                 |            |              |       |            |               |       |           |

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Celey D. Keene



### **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

teleased to Imaging: 7/22/2025 3:56:47 PM

From: Katie Jones

To: <u>Buchanan, Michael, EMNRD</u>

Subject: RE: [EXTERNAL] FW: The Oil Conservation Division (OCD) has approved the application, Application ID: 136521

**Date:** Thursday, January 23, 2025 11:20:00 AM

### Good Morning Mr. Buchanan,

The CAP Report and Soil Closure Request along with the NMOCD approval received on June 20<sup>th</sup>, 2018 can be found on the NMOCD Online: Imaging database in the Administrative/Environmental Order search category when searched by the NMOCD case number 1R426-278. The most recent photo has not been uploaded. I will be happy to upload that photo and the older reports, if necessary. Please let me know what is best for you.

Thank you,

Katie Davis
Environmental Manager
Rice Operating Company

From: Katie Jones

Sent: Tuesday, January 7, 2025 3:09 PM

To: Buchanan, Michael, EMNRD < Michael. Buchanan@emnrd.nm.gov>

Subject: FW: [EXTERNAL] FW: The Oil Conservation Division (OCD) has approved the application,

Application ID: 136521

### Good afternoon Mr. Buchanan,

The BD L-36 EOL (nAPP2110356466, 1R426-278) was granted 'Soil Closure' on June 20<sup>th</sup>, 2018. I've attached the CAP Report and Soil Closure Request, along with the approval received from NMOCD. Also included in the attachment is a photo showing recovered vegetation. I believe the soil closure approval received from NMOCD will meet the requirements of 19.15.29.12 D.(3). As such, ROC is requesting Termination or similar closure status. Upon NMOCD approval, the monitoring wells will be plugged and abandoned using a cement grout with 1 to 3% bentonite and a 3-ft cap of cement at the surface. Please let me know if you have any questions or require any additional information.

Thank you,

Katie Davis Environmental Manager RICE Operating Company

From: Buchanan, Michael, EMNRD < Michael. Buchanan@emnrd.nm.gov >

Sent: Tuesday, August 13, 2024 9:06 AM

To: Katie Jones <kjones@riceswd.com>

Subject: RE: [EXTERNAL] FW: The Oil Conservation Division (OCD) has approved the application,

Application ID: 136521

Good morning, Katie

I will be taking a look at these, and if all requirements are met, I will draft the letter of approval for closure. There is currently only one individual working on groundwater incidents and submissions, so I apologize it is taking so long. Thank you for the additional information, I appreciate it.

Mike

From: Katie Jones < kjones@riceswd.com > Sent: Monday, August 12, 2024 2:08 PM

**To:** Buchanan, Michael, EMNRD < <u>Michael.Buchanan@emnrd.nm.gov</u>>

Subject: [EXTERNAL] FW: The Oil Conservation Division (OCD) has approved the application,

Application ID: 136521

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Hello Mr. Buchanan,

Just following up on the BD L-36 EOL (nAPP2110356466, 1R426-278) update submitted on July 9, 2024 (below). Please let me know if you have any questions or require any additional information.

Thank you,

Katie Davis Environmental Manager RICE Operating Company

From: Katie Jones

**Sent:** Tuesday, July 9, 2024 3:13 PM

**To:** Buchanan, Michael, EMNRD < <u>Michael.Buchanan@emnrd.nm.gov</u>>

Subject: RE: The Oil Conservation Division (OCD) has approved the application, Application ID:

136521

Good afternoon Mr. Buchanan,

The BD L-36 EOL (nAPP2110356466, 1R426-278) was granted 'Soil Closure' on June 20<sup>th</sup>, 2018. I've attached the CAP Report and Soil Closure Request, along with the approval received from NMOCD. Also included in the attachment is a recent photo showing recovered vegetation. I believe the soil closure approval previously received from NMOCD will meet the requirements of 19.15.29.12 D.(3). Upon NMOCD approval, the monitoring

wells will be plugged and abandoned using a cement grout with 1 to 3% bentonite and a 3-ft cap of cement at the surface. Please let me know if you have any questions or require any additional information.

Thank you,

Katie Davis
Environmental Manager
RICE Operating Company

From: <a href="mailto:oCDOnline@state.nm.us">OCDOnline@state.nm.us</a>>

**Sent:** Friday, March 1, 2024 2:44 PM **To:** Katie Jones < kjones@riceswd.com >

**Subject:** The Oil Conservation Division (OCD) has approved the application, Application ID: 136521

To whom it may concern (c/o Katie Davis for RICE OPERATING COMPANY),

The OCD has approved the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAPP2110356466, with the following conditions:

• Closure Report Approved. All revegetation activities will need to be documented and included in the revegetation report. The revegetation report will need to include: An executive summary of the revegetation activities including: Seed mix, Method of seeding, dates of when the release area was reseeded, information pertinent to inspections, information about any amendments added to the soil, information on how the vegetative cover established meets the life-form ratio of plus or minus fifty percent of pre-disturbance levels and a total percent plant cover of at least seventy percent of pre-disturbance levels, excluding noxious weeds per 19.15.29.13 D.(3) NMAC, and any additional information; a scaled Site Map including area that was revegetated in square feet; and pictures of the revegetated areas during reseeding activities, inspections, and final pictures when revegetation is achieved.

The signed C-141 can be found in the OCD Online: Imaging under the incident ID (n#).

If you have any questions regarding this application, please contact me.

Thank you,
Michael Buchanan
Environmental Specialist
505-490-0798
Michael.Buchanan@emnrd.nm.gov

New Mexico Energy, Minerals and Natural Resources Department 1220 South St. Francis Drive Santa Fe, NM 87505

### BD L-36 EOL (nAPP2110356466, 1R426-278) Unit L, Section 36, T21S, R37E



Facing North 7/9/2024

From: <u>Billings, Bradford, EMNRD</u>

To: <u>Katie Jones; Edward Hansen; Yu. Olivia, EMNRD; Hernandez, Christina, EMNRD</u>

Subject: CAP and Soil Closure Request for ROC BD-SWD System, BD L-36 EOL (1R 426-278)

**Date:** Wednesday, June 20, 2018 1:21:04 PM

June 20, 2018

Katie Jones – ROC Ed Hansen – Basin

Re: Corrective Action Plan (CAP) and Soil Closure Request for ROC-BD SWD System, BD L-36 EOL (1R 426-278)

Following submitted report, data review and discussions, the following:

As has been mentioned, this is not a typical CAP and is considered to be a work plan for ground water delineation. Also, as has been noted in other Oil Conservation Division (OCD) responses recently, please be sure and include extended range (GRO, DRO and MRO) for TPH analysis.

OCD agrees that required soil remediation work based on previous approvals has been met and as such no additional soil remediation is required. This does not mean site/location is closed.

OCD also approves the nominal ground water investigation plan with the following conditions:

- 1. Please insure that top of casing for monitor wells is surveyed to the nearest 100<sup>th</sup> of a foot.
- 2. Monitor wells will be placed as per State Engineer protocol. OCD prefers, at minimum, that ten (10) feet of screen be placed into water table and five foot of screen be located above air/water interface. OCD can discuss this with ROC/Basin if needed. Ground water to be sampled for Chloride, and at least initially for BTEX, benzene and TPH.
- 3. OCD requests that proposed monitor well identified as MW-1 be located as near as practicable to the ESE edge of the larger soil excavation area. In general, moving the proposed location to the East to as near the edge of previous soil excavation as can be done.

OCD appreciates all efforts to this time by ROC and Basin for this circumstance.

If there are any questions please contact this office.

Please keep this electronic communication as NO paper copy will follow.

Sincerely,

Bradford Billings EMNRD/OCD

### Santa Fe

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

May 17, 2018

### **Bradford Billings**

New Mexico Energy, Minerals, & Natural Resources Oil Conservation Division, Environmental Bureau 1220 S. St. Francis Drive Santa Fe, New Mexico 87505

> RE: Corrective Action Plan (CAP) Report and Soil Closure Request Rice Operating Company – BD SWD System BD L-36 EOL (1R426-278): UL/L, Sec. 36, T21S, R37E

Mr. Billings:

RICE Operating Company (ROC) has retained Basin Environmental Service Technologies (Basin) to address potential environmental concerns at the above-referenced site in the BD Salt Water Disposal (SWD) system. ROC is the service provider (agent) for the BD SWD System and has no ownership of any portion of the pipeline, well, or facility. The system is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis.

### **Background and Previous Work**

The site is located approximately 2 miles east of Eunice, New Mexico at UL/L, Sec. 36, T21S, R37E as shown on the Geographical Location Map and Area Map. NM OSE records indicate that groundwater will likely be encountered at a depth of approximately 47 feet below ground surface (bgs).

In 2010, ROC initiated work on the former L-36 EOL junction box. The site was delineated using a backhoe to form a 20 ft x 20 ft x 12 ft deep excavation and soil samples were screened at regular intervals for both hydrocarbons and chlorides. From the excavation, a 4-wall composite sample and a bottom composite sample were sent to a commercial laboratory for analysis. The 4-wall composite returned a chloride reading of 896 mg/kg, a Gasoline Range Organics (GRO) reading non-detect and a Diesel Range Organics (DRO) reading of 330 mg/kg. The bottom composite sample returned a chloride reading of 3,280 mg/kg, a GRO reading of non-detect and a DRO reading of 242 mg/kg. The excavated soil was blended on site and a representative sample was sent to a commercial laboratory for analysis. The sample returned a chloride reading of 560 mg/kg, a GRO reading of non-detect and a DRO reading of 69.5 mg/kg. The blended backfill was returned to the excavation up to 5 ft bgs. At 5 – 4 ft bgs, a 1 ft thick clay barrier was installed. The clay layer will provide a barrier that will inhibit the downward migration of chlorides to groundwater. The remaining blended backfill soil was returned to the excavation,

May 17, 2018

and clean, imported soil was used to backfill the excavation to the ground surface and to contour the site to the surrounding area. On April 29<sup>th</sup>, 2010, the site was seeded with a blend of native vegetation.

To further investigate the depth of chloride presence, a soil bore was installed on June 11<sup>th</sup>, 2010. The soil bore was installed 10 ft north of the former junction box site and was advanced to a depth of 39 ft bgs. Soil samples were collected every 3 ft between 15 and 39 ft and each sample was field titrated for chlorides and field screened for PIDs. The 36 ft and 39 ft sample were sent to a commercial laboratory for analysis, resulting in a 36 ft chloride concentration of 3,680 mg/kg and GRO and DRO concentrations of non-detect. The 39 ft sample resulted in a chloride concentration of 3,360 mg/kg and GRO and DRO concentrations of non-detect. The entire borehole was plugged with bentonite to the ground surface.

NMOCD was notified of potential groundwater impact on October 5<sup>th</sup>, 2010. A junction box disclosure report was submitted to NMOCD with all the 2010 junction box closures and disclosures.

**Investigation and Characterization Plan (ICP)** 

An ICP was submitted on April 24<sup>th</sup>, 2015, and approved on May 7<sup>th</sup>, 2015. A total of 3 soil bores were installed at the site on May 20<sup>th</sup>, 21<sup>st</sup> and July 10<sup>th</sup>, 2015. As the bores were advanced, soil samples were taken every 3 ft and field tested for chlorides and hydrocarbons. Representative samples from each bore were taken to a commercial laboratory for confirmatory analysis. SB-2 returned a laboratory chloride reading of 5,280 mg/kg at 33 ft bgs, which decreased to 4,160 mg/kg at 42 ft bgs. SB-3 returned laboratory chloride readings of 7,040 mg/kg at 24 ft bgs and decreased to 4,240 mg/kg at 39 ft bgs. SB-4 returned a laboratory chloride reading of 304 mg/kg at 12 ft bgs, which decreased to 128 mg/kg at 15 ft bgs. GRO and DRO readings at all depth in all bores were non-detect, with the exception of DRO at 33 ft in SB-2, which resulted in a concentration of 72.7 mg/kg. The northern edge of the site is defined by SB-4 with chloride concentrations decreasing to 128 mg/kg at 15 ft bgs. The eastern edge is defined by the 5 ft east vertical with a chloride concentration of 119 mg/kg at 12 ft bgs. The western edge is defined by the 15 ft west vertical with a chloride concentration of 119 mg/kg at 12 ft bgs. The 10 ft south vertical defined the southern edge of the site with a chloride concentration of 178 mg/kg.

### **Corrective Action Plan**

A CAP was submitted on February 9<sup>th</sup>, 2017, which recommended the installation of a 42 ft x 31 ft, 20-mil reinforced poly liner at 5-3.5 ft bgs depending on the depth of the existing clay liner. NMOCD responded on February 23<sup>rd</sup>, 2017, requesting additional data to the south of the site.

### **Additional Investigation**

In accordance with the request from OCD, three additional soil bores (SB-5, SB-6 and SB-7) were installed at the site on September 18<sup>th</sup> and September 21<sup>st</sup>, 2017. As the bores were

May 17, 2018

advanced, soil samples were taken every 3 ft and field tested for chlorides and hydrocarbons. Representative samples from each bore were taken to a commercial laboratory for confirmatory analysis. SB-5 returned a laboratory chloride reading of 1,260 mg/kg at 33 ft bgs, which decreased to 1,040 mg/kg at 42 ft bgs. SB-6 returned laboratory chloride readings of 1,100 mg/kg at 24 ft bgs and decreased to 384 mg/kg at 42 ft bgs. SB-7 returned a laboratory chloride reading of 752 mg/kg at 36 ft bgs, which decreased to 32 mg/kg at 42 ft bgs. (The sample at 42 ft bgs in SB-7 originally resulted in a chloride concentration of 928 mg/Kg from the laboratory. Since this relatively high concentration did not coincide with the field chloride test result for that sample and the lower chloride results at 36 ft and 39 ft bgs, ROC ordered a re-analysis of the sample. ROC believes that there was some human error with the sample originally.) GRO and DRO readings at all depth in all bores were non-detect. Each bore was plugged with bentonite to ground surface.

### **Corrective Action Plan Addendum**

Based on the additional soil data, Basin recommended that ROC install a 91 ft x 31 ft (rather than a 42 ft x 31 ft), 20-mil reinforced poly liner at 5-3.5 ft bgs, depending on the actual depth of the existing clay liner. The liner will inhibit the downward migration of residual constituents through the vadose zone, and will cover the existing 20x20-ft clay liner. The soils placed above the liner will have a laboratory chloride reading no greater than 500 mg/kg and a field PID measurement below 100 ppm. Excavated soils was evaluated for use as backfill and any soils that do not meet requirements was properly disposed of at a NMOCD approved facility. The excavation was backfilled to ground surface and contoured to the surrounding location.

The soils over and surrounding the site was prepared with soil amendments as necessary and seeded with a native vegetative mix. Vegetation above the liner will also provide a natural infiltration barrier for the site since plants capture water through their roots thereby reducing the volume of water moving through the vadose zone.

### **CAP Report and Soil Closure Request**

According to the Corrective Action Plan (CAP) and CAP Addendum, which was approved by the NMOCD on the October 30<sup>th</sup>, 2017, ROC installed a 20-mil reinforced poly liner across the site with the dimensions of 91 x 31 ft at a depth of 4.5 ft bgs, which covered the previously installed 20 x 20 ft clay liner. A total of 852 cubic yards of excavated soil were taken to a NMOCD approved facility for disposal. The bottom of the excavation was padded with 6 inches imported blow sand and a 20-mil reinforced liner was installed and properly seated at 4.5 ft bgs. The top of the liner was padded with 6 inches of imported blow sand, and the excavation was backfilled to ground surface with imported top soil. A sample of the imported blow sand and a sample of the imported top soil were sent to a commercial laboratory for analysis of chloride and returned a result of 16 mg/kg and 32 mg/kg, respectively. The soil samples were also analyzed for GRO and DRO resulting in <10 mg/Kg for all samples. The backfilled site was then seeded with a blend of native vegetation. Vegetation above the liner will also provide a natural infiltration barrier for the site, since plants capture water through their roots thereby reducing the

May 17, 2018

volume of water moving through the vadose zone. Documentation of this work is included in the Appendix.

### **Groundwater Monitoring Plan**

In order to determine what affect the residual chlorides may have had on the groundwater quality below the site, BEST recommends that ROC install a near-source monitor well (MW-1) located approximately 45 feet down-gradient of the former junction box. To determine if there is an upgradient source of contaminates coming onto the site, MW-2 will be installed approximately 75 feet up-gradient of the former junction box. Also, an additional monitoring well (MW-3) will be installed approximately 100 feet down-gradient of the former junction box (see Proposed Monitoring Wells). Additional monitoring wells may be required to fully delineate groundwater quality. The monitor wells will be installed to NMOCD and EPA standards and then sampled quarterly. Once groundwater quality has been determined, ROC will either submit a groundwater remedy to NMOCD to address groundwater quality at the site or submit a termination request for site closure.

ROC has completed the vadose zone remediation as approved by NMOCD in the CAP. The 20-mil reinforced liner will inhibit the further migration of chlorides through the vadose zone in to groundwater. Therefore, ROC requests "Soil Closure" or similar closure status.

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

Sincerely,

Edward J. Hansen

Senior Hydrologist

Basin Environmental Service Technologies

Edward J. Hansen

Attachments:

Geographical Location Map

Area Map

Installed Liner Plat

Proposed Monitoring Wells Plat

Appendix – Liner Installation Documentation

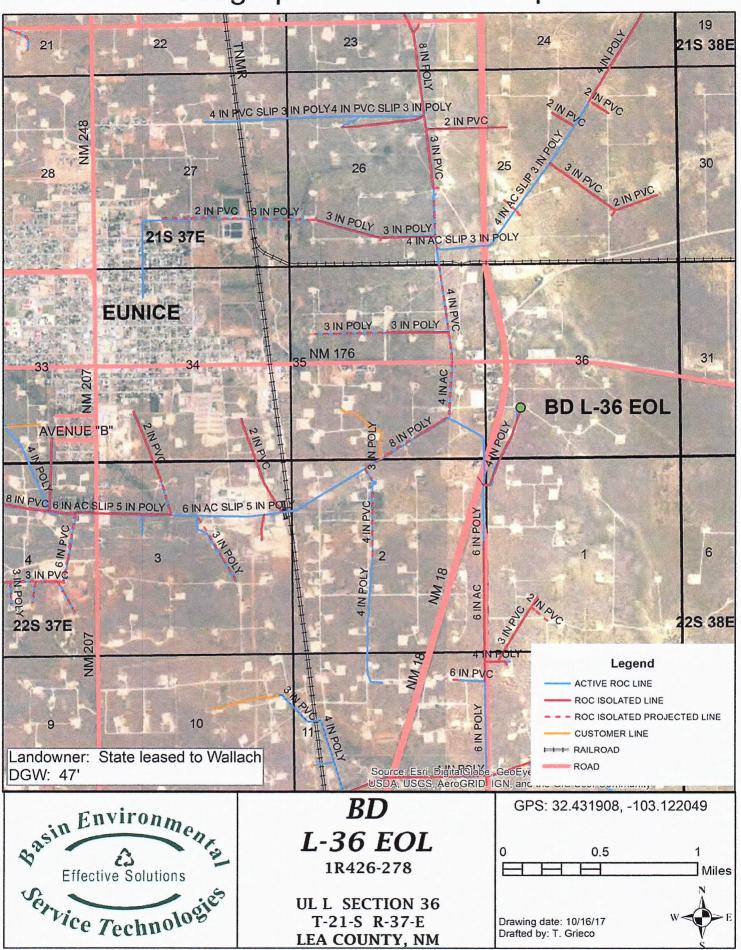
# **Figures**

Basin Environmental Service Technologies (BEST)

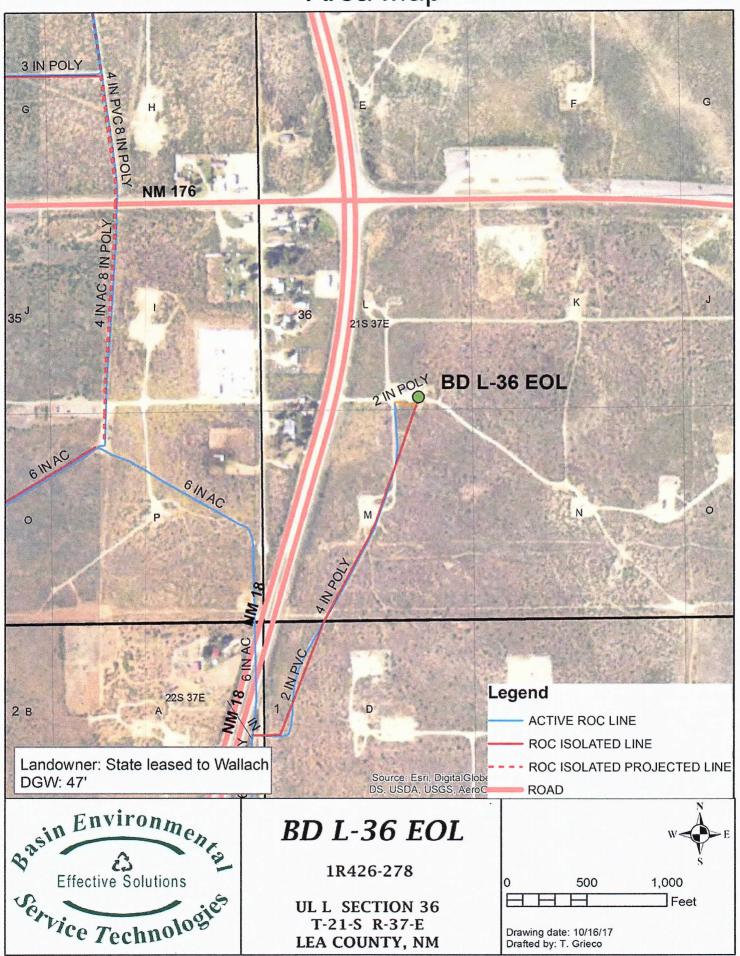
P.O. Box 2948, Hobbs, NM 88241

Phone: 575-393-2967

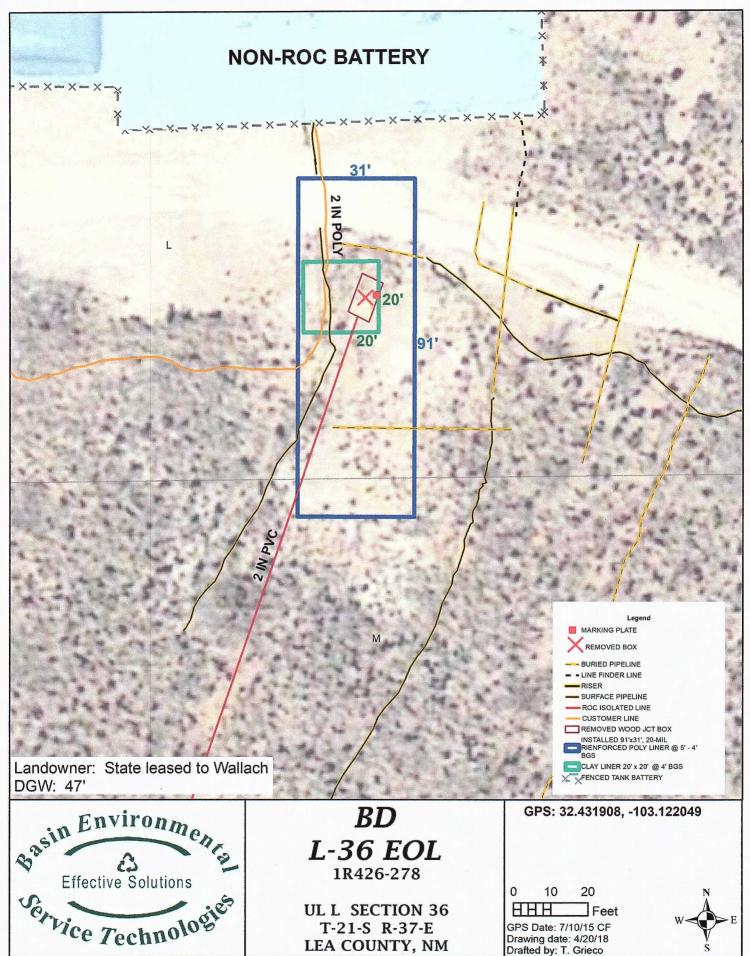
### Geographical Location Map



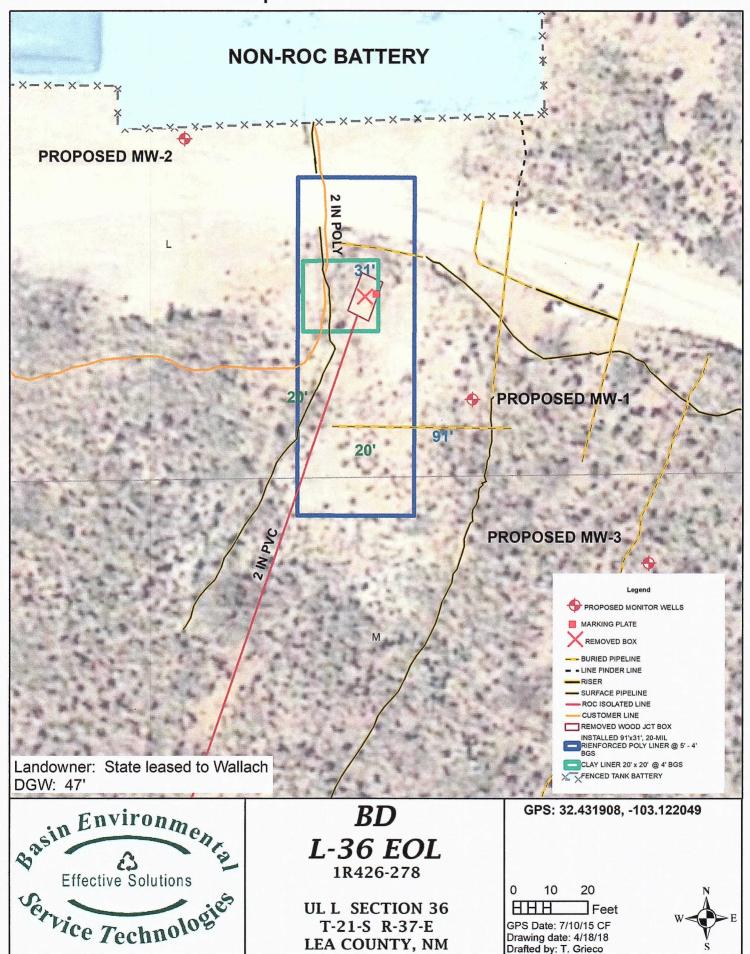
### Area Map



### **Liner Installation**



# Received by OCD: 3/31/2025 10:37:26 AM Proposed Monitor Wells



# **Appendix**

Basin Environmental Service Technologies (BEST)

P.O. Box 2948, Hobbs, NM 88241

Phone: 575-393-2967

### BD L-36 EOL

Unit L, Section 36, T21S, R37E



Spotting lines with hydrovac, facing southwest

12/13/2017



Exporting excavated soil, facing northeast

12/19/2017



Installing 20-mil, reinforced liner at 4.5 ft bgs, facing north 12/19/2017



Excavating the site to 5 ft bgs,

facing north 12/18/2017



Importing blow sand, facing south

12/19/2017



Padding the 20-mil, reinforced liner with imported soil, facing northeast 12/19/2017



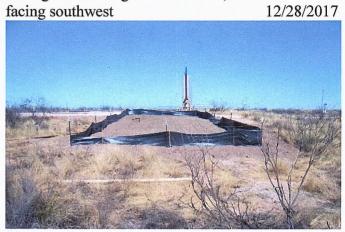
Backfilling and contouring the site with imported soil, facing west 12/27/2017



Seeding site, completing silt net fencing, facing northeast 12/28/2017



Tilling and seeding backfilled site, facing southwest



Site complete, facing north



December 28, 2017

KATIE JONES

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: BD L-36 EOL

Enclosed are the results of analyses for samples received by the laboratory on 12/19/17 16:30.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-17-10. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at <a href="https://www.tceq.texas.gov/field/ga/lab">www.tceq.texas.gov/field/ga/lab</a> accredited certif.html.

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

Method EPA 552.2

Haloacetic Acids (HAA-5)

Method EPA 524.2

Total Trihalomethanes (TTHM)

Method EPA 524.4

Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

Celes D. Keene

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

Sincerely,

Celey D. Keene

Lab Director/Quality Manager



### Analytical Results For:

Rice Operating Company KATIE JONES 112 W. Taylor Hobbs NM, 88240

Fax To:

(575) 397-1471

Received:

12/19/2017

Sampling Date: Sampling Type: 12/19/2017

Soil

Reported: Project Name: 12/28/2017 BD L-36 EOL

Sampling Condition:

Cool & Intact

Project Number: Project Location: NONE GIVEN NOT GIVEN

Sample Received By:

Tamara Oldaker

### Sample ID: IMPORTED BACKFILL (H703512-01)

| Chloride, SM4500CI-B          | mg,    | /kg             | Analyze    | d By: AC     |     |            |               |       |           |
|-------------------------------|--------|-----------------|------------|--------------|-----|------------|---------------|-------|-----------|
| Analyte                       | Result | Reporting Limit | Analyzed   | Method Blank | BS  | % Recovery | True Value QC | RPD   | Qualifier |
| Chloride                      | 16.0   | 16.0            | 12/21/2017 | ND           | 432 | 108        | 400           | 3.77  |           |
| TPH 8015M                     | mg,    | /kg             | Analyze    | d By: MS     |     |            |               |       |           |
| Analyte                       | Result | Reporting Limit | Analyzed   | Method Blank | BS  | % Recovery | True Value QC | RPD   | Qualifier |
| GRO C6-C10*                   | <10.0  | 10.0            | 12/27/2017 | ND           | 213 | 107        | 200           | 0.274 |           |
| DRO >C10-C28*                 | <10.0  | 10.0            | 12/27/2017 | ND           | 208 | 104        | 200           | 0.493 |           |
| Surrogate: 1-Chlorooctane     | 107    | % 28.3-16       | 4          |              |     |            |               |       |           |
| Surrogate: 1-Chlorooctadecane | 102 9  | % 34.7-15       | 7          |              |     |            |               |       |           |

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Celey D. Keene, Lab Director/Quality Manager

Page 2 of 4



#### **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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Clay to Keene

Celey D. Keene, Lab Director/Quality Manager

Page 3 of 4



### CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240 (575) 393-2326 FAX (575) 393-2476

|                          | (575) 393-2326 FAX (575) 393-247                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            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| Relinquished By:                | Date:   | Received By:     | 1111        | Phone Result: | ☐ Yes    | □ No | Add'l Phone #:          |
|---------------------------------|---------|------------------|-------------|---------------|----------|------|-------------------------|
|                                 | 1419117 |                  | 1/1/2       | Fax Result:   | ☐ Yes    | □ No | Add'l Fax #:            |
| 1 cm                            | Time:   | Allings CVV      | VANTRU      | REMARKS:      |          |      |                         |
| D-II-                           | 1 4130  | Summer Coll      | usels       | 5. 6          | a. th    | 6.   |                         |
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|                                 | inne.   |                  |             | Kartie        | EMES     | 1    | Kyonesla noisud con     |
| Delivered By: (Circle One)      | 0       | Sample Condition | CHECKED BY: | L 1 1         | Now wa   | 601  |                         |
| 3.0                             | e       | Cool Intact      | (Initials)  | Kyled         | HOA LEG  |      |                         |
| Sampler - UPS - Bus - Other: // | . + /   | Yes Yes          | - H         |               | *        | 1    | torreco la basinens com |
| Ces                             | receld  | S. dy No No No   | 19-475      | 10mgC         | CICLE    | - 1  | direct Constitution     |



December 29, 2017

KATIE JONES

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: BD L-36 EOL

Enclosed are the results of analyses for samples received by the laboratory on 12/20/17 16:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-17-10. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at <a href="https://www.tceq.texas.gov/field/ga/lab">www.tceq.texas.gov/field/ga/lab</a> accredited certif.html.

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

Method EPA 552.2

Haloacetic Acids (HAA-5)

Method EPA 524.2

Total Trihalomethanes (TTHM)

Method EPA 524.4

Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

Celey D. Keena

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

Sincerely,

Celey D. Keene

Lab Director/Quality Manager



### Analytical Results For:

Rice Operating Company KATIE JONES 112 W. Taylor Hobbs NM, 88240

Fax To:

(575) 397-1471

Received:

12/20/2017 12/29/2017

Sampling Date: Sampling Type: 12/20/2017

Reported:

BD L-36 EOL

Sampling Condition:

Soil

Project Name: Project Number:

NONE GIVEN

Cool & Intact

Project Location:

NOT GIVEN

Sample Received By:

Tamara Oldaker

#### Sample ID: BACKFILL FROM PIT (H703561-01)

| Chloride, SM4500CI-B          | mg/    | kg              | Analyze    | d By: AC     |     |            |               |      |           |
|-------------------------------|--------|-----------------|------------|--------------|-----|------------|---------------|------|-----------|
| Analyte                       | Result | Reporting Limit | Analyzed   | Method Blank | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| Chloride                      | 32.0   | 16.0            | 12/27/2017 | ND           | 416 | 104        | 400           | 3.77 |           |
| TPH 8015M                     | mg/    | kg              | Analyze    | d By: MS     |     |            |               |      |           |
| Analyte                       | Result | Reporting Limit | Analyzed   | Method Blank | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| GRO C6-C10*                   | <10.0  | 10.0            | 12/27/2017 | ND           | 204 | 102        | 200           | 6.53 |           |
| DRO >C10-C28*                 | <10.0  | 10.0            | 12/27/2017 | ND           | 188 | 94.1       | 200           | 2.22 |           |
| Surrogate: 1-Chlorooctane     | 86.9   | % 28.3-16       | 4          |              |     |            |               |      |           |
| Surrogate: 1-Chlorooctadecane | 85.3 9 | % 34.7-15       | 7          |              |     |            |               |      |           |

### Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and dients 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 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,

Celeg Estrana

Celey D. Keene, Lab Director/Quality Manager

Page 2 of 4



#### **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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Celeg & Keine

Celey D. Keene, Lab Director/Quality Manager

Page 3 of 4

### CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240 (575)-393-2326 FAX (575) 393-2476

|                  | 57 <del>5) 3</del> 93-2326 FAX (575) 393-2476                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       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| service. In no event shall Cardinal be liable for incidental of consequence durings between days and the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.    Phone Result:   Yes   No   Add'l Phone #:   Reclinquished By:   Fax Result:   Yes   No   Add'l Fax #: |                                                        |
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| Date: / Received by.                                                                                                                                                                                                                                                                                                                           | The second resemble to the second second second second |
|                                                                                                                                                                                                                                                                                                                                                | CONTRACTOR OF STREET                                   |
| DESTADICE.                                                                                                                                                                                                                                                                                                                                     |                                                        |
| Timb.                                                                                                                                                                                                                                                                                                                                          |                                                        |
| There was a com                                                                                                                                                                                                                                                                                                                                |                                                        |
| Relinquished By:  Date: Received By:    Cones (a rius wd. com                                                                                                                                                                                                                                                                                  |                                                        |
| Relinquished By: Date: Received by:                                                                                                                                                                                                                                                                                                            |                                                        |
| Time: taries a hasinenv.com                                                                                                                                                                                                                                                                                                                    |                                                        |
|                                                                                                                                                                                                                                                                                                                                                |                                                        |
|                                                                                                                                                                                                                                                                                                                                                |                                                        |
| Delivered By: (Circle Une)                                                                                                                                                                                                                                                                                                                     |                                                        |
| Cool Intact (Initials)                                                                                                                                                                                                                                                                                                                         |                                                        |
| Yes Yes                                                                                                                                                                                                                                                                                                                                        |                                                        |
| Sampler - UPS - Bus - Other - O. T. S. C. No No                                                                                                                                                                                                                                                                                                |                                                        |



112 West Taylor Hobbs, NM 88240 Phone: (575) 393-9174 Fax: (575) 397-1471

### **VEGETATION FORM**

| ı. | General | Information |  |
|----|---------|-------------|--|
| _  |         |             |  |

| Site name: BD L-36 E0 | DL             |                 |              |               |                       |                          |
|-----------------------|----------------|-----------------|--------------|---------------|-----------------------|--------------------------|
| U/L<br>L              | Section<br>36  | Township<br>21S | Range<br>37E | County<br>Lea | Latitude<br>32.431908 | Longitude<br>-103.122049 |
| Contact Name: Katie   | Jones Davis    |                 |              |               | 32.131700             | -103.122047              |
| Email: kjone          | es@riceswd.com |                 |              |               |                       |                          |
| Site size: 2,500      | square feet    |                 |              |               |                       |                          |

| 2. Soils                 | *Do not rip caliche subsoils; caliche rocks brought to the surface by ripping shall be removed. |             |              |           |        |             |   |            |
|--------------------------|-------------------------------------------------------------------------------------------------|-------------|--------------|-----------|--------|-------------|---|------------|
| Salvaged from site       | Bioremediated                                                                                   | Imported    | X            | Blended   |        | Depth (in)  |   |            |
| Texture: sandy           |                                                                                                 | Describe so | oil & subsoi | l: top so | il and | l blow sand |   |            |
| Soil prep methods:       | Rip                                                                                             | Depth (in)  |              | Disc      | Х      | Depth (in)  | 3 | Rollerpack |
| Date completed: 12/27/20 | )17                                                                                             |             |              |           |        |             |   |            |

### 3. Bioremediation

| Fertilizer | Hay       | Other     |
|------------|-----------|-----------|
| Туре:      | Describe: | Describe: |
| Lbs/acre:  |           |           |

| 4. Seeding             | *Atta   | ich seed bag tags i | o this | form. Seed b | ag tags shal | contail | the site name and S-T-R.             |       |            |  |
|------------------------|---------|---------------------|--------|--------------|--------------|---------|--------------------------------------|-------|------------|--|
| Custom Seed Mix        | X       | Prescribed Mix      |        | Seed Mix N   | ame: 5 lbs L | a Count | y Mix & 50 lbs Winter Wheat Seed Mix | Date: | 12/28/2017 |  |
| Method: broadcast v    | vith se | eder                |        |              |              |         |                                      |       |            |  |
| Soil conditions during | seed:   | Dry                 | X      | Damp         | Wet          |         |                                      |       |            |  |
| Observations: Seed     | was t   | illed into the soil |        |              |              |         |                                      |       | ·          |  |

| 5. Cert    | ification I   | nereby certify that the | he information | n in this form and | l attachments is true and complete to t | he best of my knowledge and belief. |
|------------|---------------|-------------------------|----------------|--------------------|-----------------------------------------|-------------------------------------|
| Name:      | Katie Jones D | avis                    | r              | Title:             | Environmental Manager                   | Date: 12/28/2017                    |
| Signature: | KK            | 1001                    | 2              | -1                 |                                         |                                     |

Sante Fe Main Office Phone: (505) 476-3441

General Information Phone: (505) 629-6116

Online Phone Directory <a href="https://www.emnrd.nm.gov/ocd/contact-us">https://www.emnrd.nm.gov/ocd/contact-us</a>

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

CONDITIONS

Action 447171

#### **CONDITIONS**

| Operator:              | OGRID:                                                   |
|------------------------|----------------------------------------------------------|
| RICE OPERATING COMPANY | 19174                                                    |
| PO Box 5630            | Action Number:                                           |
| Hobbs, NM 88241        | 447171                                                   |
|                        | Action Type:                                             |
|                        | [UF-GWA] Ground Water Abatement (GROUND WATER ABATEMENT) |

#### CONDITIONS

| Cr | eated By | Condition                                           | Condition<br>Date |
|----|----------|-----------------------------------------------------|-------------------|
| jl | ourdine  | Revegetation report approved, remediation complete. | 7/22/2025         |