

# **RICE** *Operating Company*

112 West Taylor • Hobbs, New Mexico 88240

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

**June 22, 2020**

## **Bradford Billings**

New Mexico Energy, Minerals, & Natural Resources

Oil Conservation Division, Environmental Bureau

1220 S. St. Francis Drive

Santa Fe, New Mexico 87505

**RE: Termination Request**

**Rice Operating Company – BD SWD System**

**BD P-17 vent (1R426-132): UL/P, Sec. 17, T21S, R37E**

Mr. Billings:

RICE Operating Company (ROC) submits the following to address potential environmental concerns at the above referenced site in the BD Saltwater 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 northwest of Eunice, New Mexico at UL/P, Sec. 17, T21S, R37E as shown on the Geographical Location Map. NM OSE records indicate that groundwater will likely be encountered at a depth of below 70 feet below ground surface (bgs). A junction box disclosure report was submitted to NMOCD in May 2007.

In 2005, ROC initiated work on the former P-17 vent junction box. The site was delineated using a backhoe to form a 30x20x12 ft deep excavation and soil samples were screened at regular intervals for both hydrocarbon and chloride. From the excavation, a 4-wall composite sample, a bottom composite sample, and backfill composite sample were sent to a commercial laboratory for analysis. The sidewall composite returned a chloride reading of 837 mg/kg, Gasoline Range Organics (GRO) and Diesel Range Organics (DRO) readings non-detect. The bottom composite sample returned a chloride reading of 1,600 mg/kg, GRO and DRO readings of non-detect. The backfill composite sample returned a chloride reading of 894 mg/kg, a GRO reading of 7.12 mg/kg and a DRO reading of 121 mg/kg. The blended backfill was returned to the excavation up to 6 ft bgs. Then a one-foot clay liner was installed in the excavation. The remaining backfill soil was returned to the excavation to the ground surface and the site was contoured to the surrounding area. A junction box is no longer required at this site.

**Investigation and Characterization Plan (ICP) Report**

Based on the ICP submitted to NMOCD on June 14, 2018, five soil bores were drilled on July 16 and 17, 2018. Soil samples were collected at regular intervals in each bore. The 10 ft and 15 ft samples from SB-1 were sent to a commercial laboratory for analysis, resulting in a 10 ft chloride concentration of 288 mg/kg and a GRO concentration of non-detect and a DRO concentration of 29.6 mg/kg and an Extended DRO (EXT-DRO) concentration of 14.1 mg/kg. The 15 ft sample resulted in a chloride concentration of 144 mg/kg and GRO/DRO/EXT-DRO concentrations of non-detect. The 15 ft and 25 ft samples from SB-2 were sent to a commercial laboratory for analysis, resulting in a 15 ft chloride concentration of 288 mg/kg and GRO/DRO/EXT-DRO concentrations of non-detect. The 25 ft sample resulted in a chloride concentration of 112 mg/kg and GRO/DRO/EXT-DRO concentrations of non-detect. The 5 ft and 15 ft samples from SB-3 were sent to a commercial laboratory for analysis, resulting in a 5 ft chloride concentration of 96 mg/kg and GRO/DRO/EXT-DRO concentrations of non-detect. The 15 ft sample resulted in a chloride concentration of 144 mg/kg and GRO/DRO/EXT-DRO concentrations of non-detect. The 15 ft and 30 ft samples from SB-4 were sent to a commercial laboratory for analysis, resulting in a 15 ft chloride concentration of 992 mg/kg and GRO/DRO/EXT-DRO concentrations of non-detect. The 30 ft sample resulted in a chloride concentration of 304 mg/kg and GRO/DRO/EXT-DRO concentrations of non-detect. The 5 ft and 20 ft samples from SB-5 were sent to a commercial laboratory for analysis, resulting in a 5 ft chloride concentration of 400 mg/kg and GRO/DRO/EXT-DRO concentrations of non-detect. The 20 ft sample resulted in a chloride concentration of 224 mg/kg and GRO/DRO/EXT-DRO concentrations of non-detect. Each bore hole was plugged with bentonite to ground surface.

To determine if the residual chloride in the vadose zone pose a threat to groundwater quality, ROC ran the U.S. Environmental Protection Agency Exposure Assessment Multimedia Model (MULTIMED Version 1.5, 2005). The model output concludes that the peak concentration of chloride in groundwater contributed by the vadose zone soils (based on boring data) would be approximately 51 mg/L in 264 years with a liner installation. Since the estimated increase in chloride concentrations in groundwater from residual chloride migration is below the WQCC standard of 250 mg/L, no action is warranted for the groundwater at this site.

**Corrective Action Plan (CAP) Report**

Based on the collected soil data, ROC submitted an ICP Report and CAP on May 16, 2018, which NMOCD approved on August 23, 2019.

In order to inhibit the downward migration of residual constituents through the vadose zone, ROC excavated a 57x32-ft area to a depth of 4.5 ft bgs. A representative composite sample was collected from the 4-walls and was analyzed by a commercial laboratory for chloride and hydrocarbon. The composite sample resulted in a chloride concentration of 336 mg/kg, GRO/DRO/EXT-DRO concentrations below detectable limit, and BTEX concentrations below detectable limit. A total of 348 cubic yards of excavated soil were taken to a NMOCD approved facility for disposal. Four representative samples were collected from the remaining excavated soil, resulting in a chloride concentration of 144 mg/kg, 160 mg/kg, 112 mg/kg, and 112 mg/kg.

Hydrocarbon concentrations, GRO/DRO/EXT-DRO and BTEX, were below detectable limits in each sample. The top of the liner was padded with imported soil, and the excavation was backfilled to ground surface and contoured to the surrounding area with the clean, excavated soil. A sample of the imported soil was analyzed by a commercial laboratory for chloride resulting in a concentration of 16 mg/kg. The backfilled site was 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 volume of water moving through the vadose zone.

### **Recommendations**

ROC has completed the vadose zone remediation as approved by OCD in the CAP. The 20-mil reinforced liner will inhibit the migration of chloride through the vadose zone to groundwater. As such, ROC respectfully requests termination of the regulatory file. ROC acknowledges they have met the requirements of 19.15.29 NMAC and a final C-141 is attached.

ROC appreciates the opportunity to work with you on this project. Please call me at (575) 393-9174 or Edward Hansen at (505) 920-4965 if you have any questions or wish to discuss the site.

Sincerely,

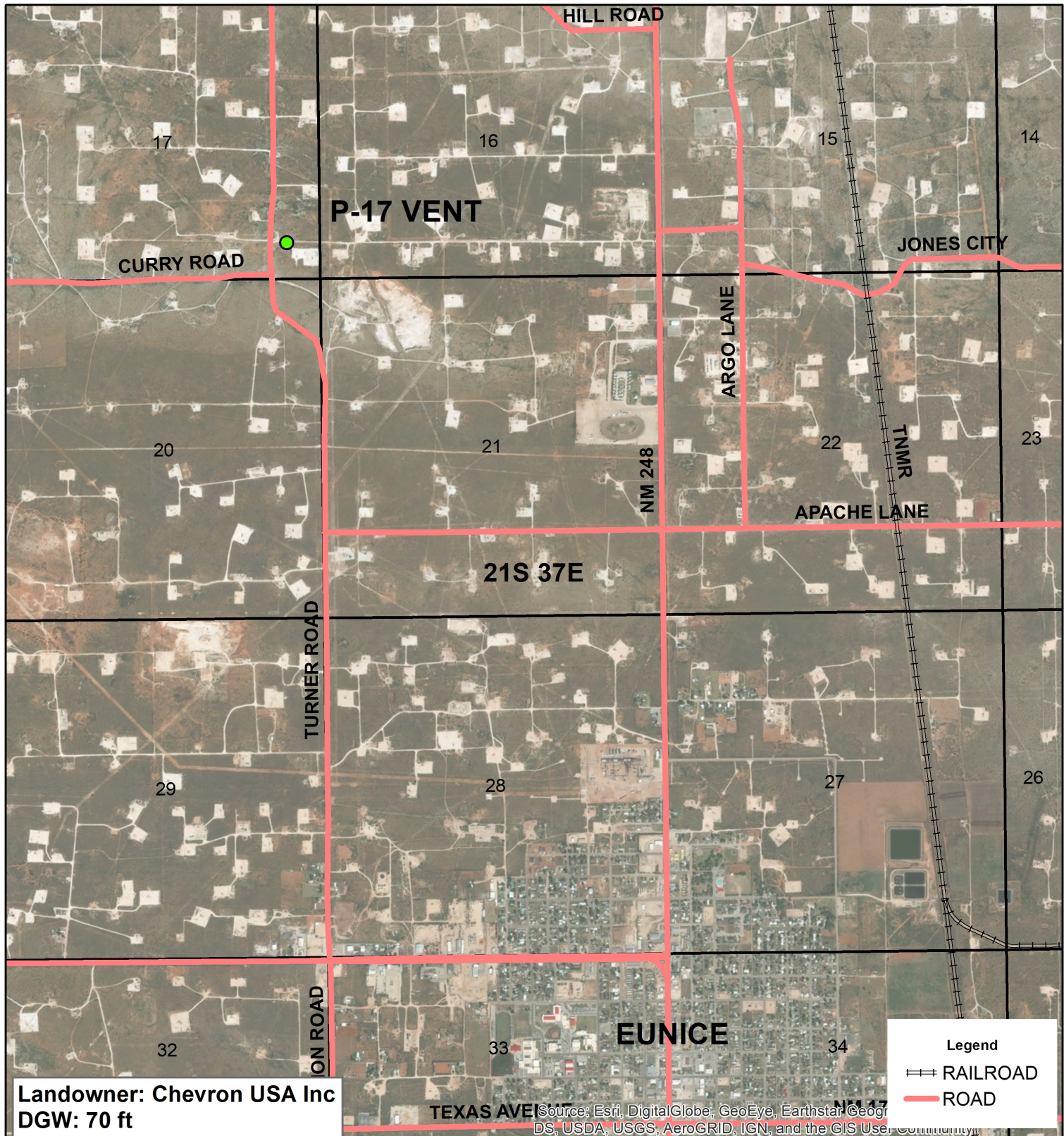


Katie Davis  
Environmental Manager  
RICE Operating Company

Appendix

# Figures

**RICE Operating Company**  
112 West Taylor, Hobbs, NM 88240  
Phone 575.393.9174



**BD**  
**P-17 VENT**  
1R426-132

UL P SECTION 17  
T-21-S R-37-E  
LEA COUNTY, NM

GPS: 32.473216 -103.178274

0 1,000 2,000  
Feet

Drawing date: 5/29/18  
Drafted by: T. Grieco





***BD***  
***P-17 VENT***  
1R426-132

**UL P SECTION 17  
T-21-S R-37-E  
LEA COUNTY, NM**

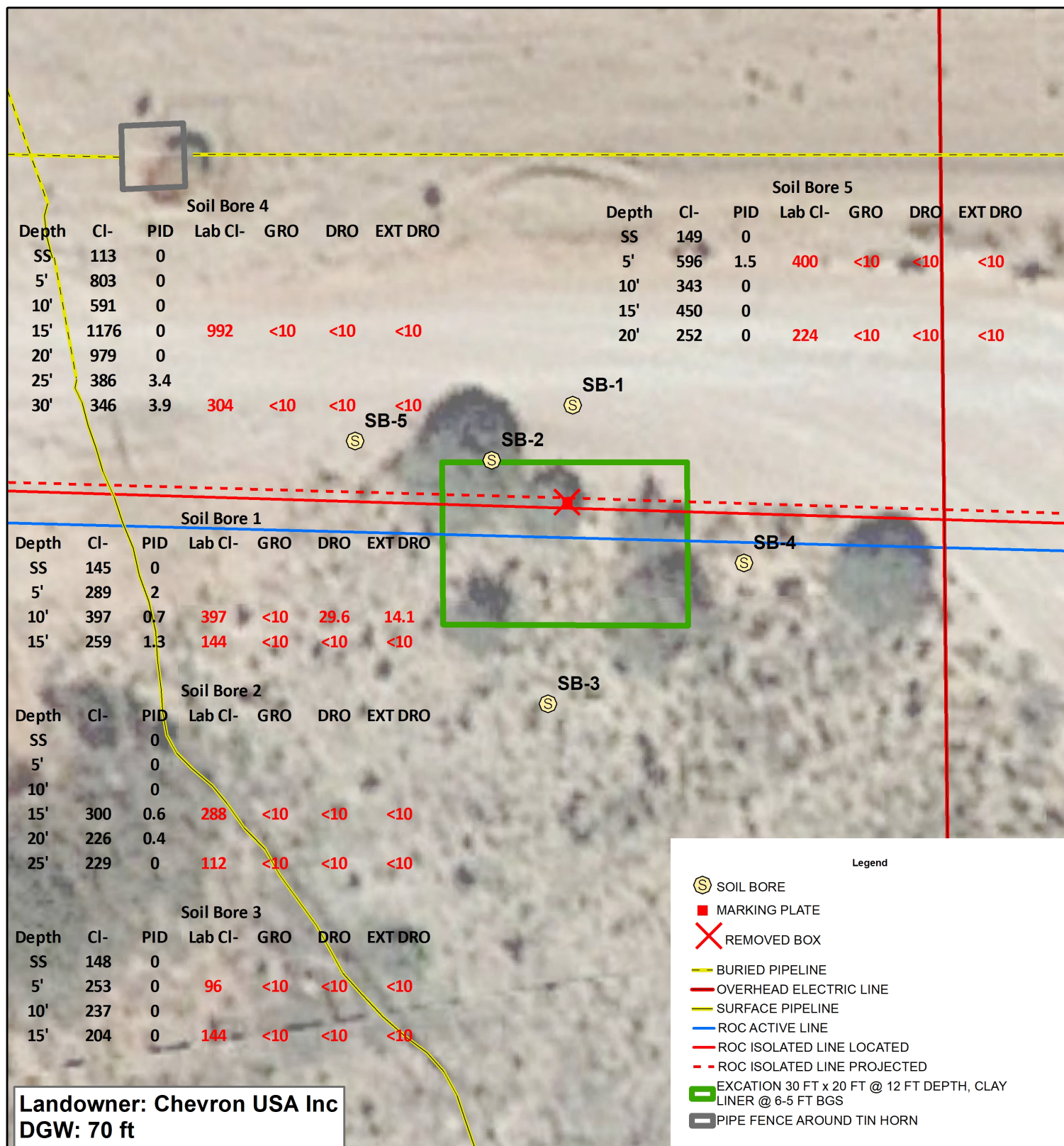
GPS: 32.473216 -103.178274

0                      500                      1,000

Feet

Drawing date: 5/29/18  
Drafted by: T. Grieco





**BD**  
**P-17 VENT**  
1R426-132

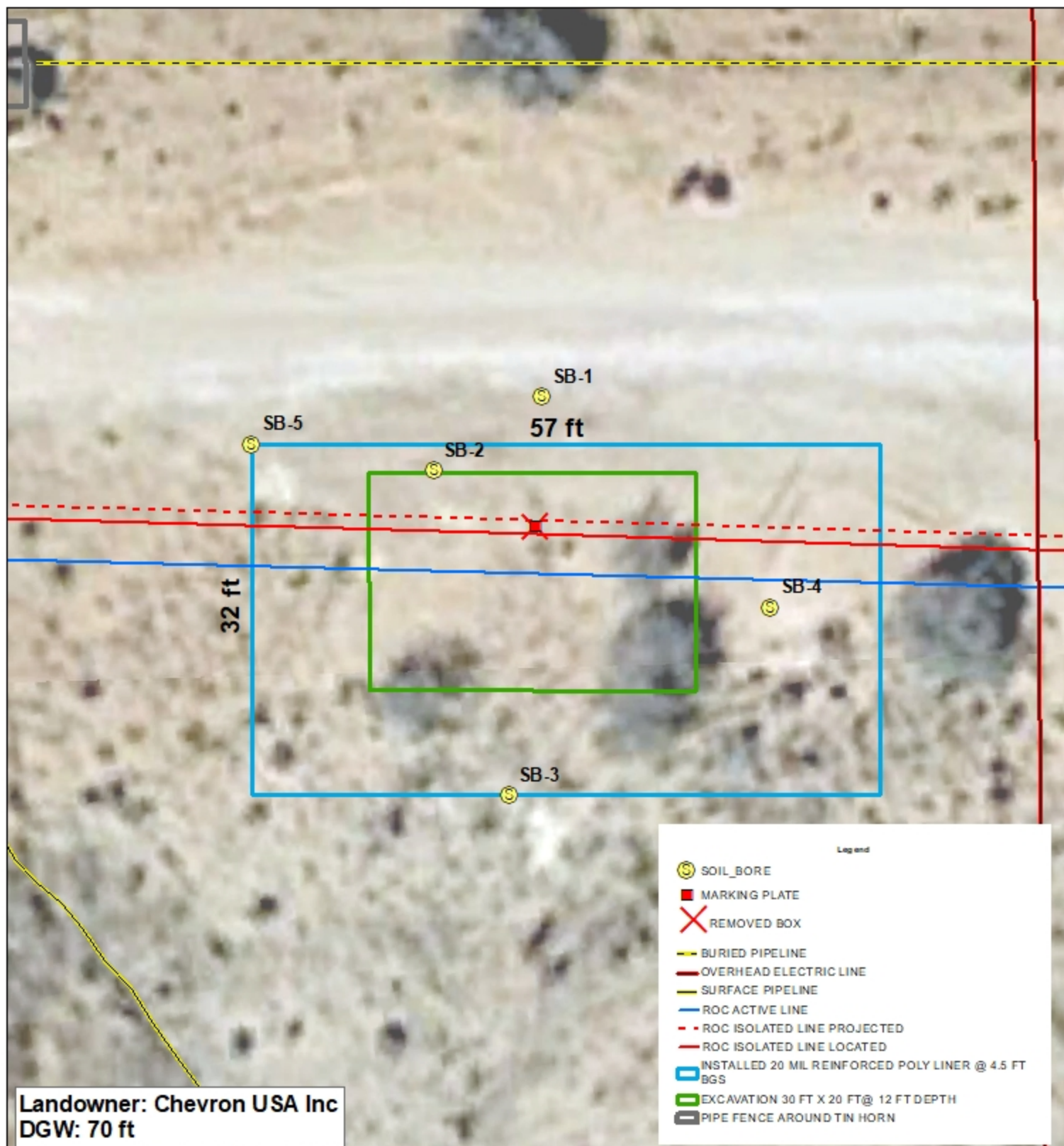
UL P SECTION 17  
T-21-S R-37-E  
LEA COUNTY, NM

GPS: 32.473216 -103.178274

0 10 20  
Feet

GPS date: 6/1/18, 7/24/18 TG  
Drawing date: 8/21/18  
Drafted by: T. Grieco





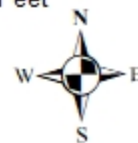
**BD**  
**P-17 VENT**  
1R426-132

UL P SECTION 17  
T-21-S R-37-E  
LEA COUNTY, NM

GPS: 32.473216 -103.178274  
NAD 83 STATE PLANE PROJECTION  
NEW MEXICO EAST ZONE

0 10 20  
Feet

GPS date: 6/1/18, 7/24/18 TG  
Drawing date: 4/9/20  
Drafted by: T. Grieco



# Excavation and Liner Installation

**RICE Operating Company**  
112 West Taylor, Hobbs, NM 88240  
Phone 575.393.9174



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

---

October 31, 2019

KATIE JONES

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: BD P-17 VENT

Enclosed are the results of analyses for samples received by the laboratory on 10/25/19 8:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-18-11. 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". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

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: 10/25/2019  
 Reported: 10/31/2019  
 Project Name: BD P-17 VENT  
 Project Number: NONE GIVEN  
 Project Location: NOT GIVEN

Sampling Date: 10/24/2019  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: 4 WALL COMPOSITE (H903655-01)**

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/30/2019	ND	1.84	91.9	2.00	0.987	
Toluene*	<0.050	0.050	10/30/2019	ND	1.85	92.7	2.00	1.04	
Ethylbenzene*	<0.050	0.050	10/30/2019	ND	1.87	93.3	2.00	1.04	
Total Xylenes*	<0.150	0.150	10/30/2019	ND	5.57	92.9	6.00	1.03	
Total BTEX	<0.300	0.300	10/30/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 98.6 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	336	16.0	10/28/2019	ND	400	100	400	3.92		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/29/2019	ND	217	108	200	0.204	
DRO >C10-C28*	<10.0	10.0	10/29/2019	ND	214	107	200	3.06	
EXT DRO >C28-C36	<10.0	10.0	10/29/2019	ND					

Surrogate: 1-Chlorooctane 101 % 41-142

Surrogate: 1-Chlorooctadecane 104 % 37.6-147

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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

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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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A handwritten signature in black ink, appearing to read "Celey D. Keene", is written over a horizontal line.

Celey D. Keene, Lab Director/Quality Manager

**ARDINAL LABORATORIES**

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603  
(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]

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



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---

October 31, 2019

KATIE JONES

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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:	10/25/2019	Sampling Date:	10/24/2019
Reported:	10/31/2019	Sampling Type:	Soil
Project Name:	BD P-17 VENT	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	NOT GIVEN		

**Sample ID: EXCAVATED SOIL # 1 (H903657-01)**

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/30/2019	ND	1.84	91.9	2.00	0.987	
Toluene*	<0.050	0.050	10/30/2019	ND	1.85	92.7	2.00	1.04	
Ethylbenzene*	<0.050	0.050	10/30/2019	ND	1.87	93.3	2.00	1.04	
Total Xylenes*	<0.150	0.150	10/30/2019	ND	5.57	92.9	6.00	1.03	
Total BTEX	<0.300	0.300	10/30/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 98.4 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	144	16.0	10/28/2019	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/29/2019	ND	215	107	200	1.18	
DRO >C10-C28*	<10.0	10.0	10/29/2019	ND	211	106	200	1.63	
EXT DRO >C28-C36	<10.0	10.0	10/29/2019	ND					

Surrogate: 1-Chlorooctane 101 % 41-142

Surrogate: 1-Chlorooctadecane 103 % 37.6-147

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\*=Accredited Analyte

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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: 10/25/2019  
 Reported: 10/31/2019  
 Project Name: BD P-17 VENT  
 Project Number: NONE GIVEN  
 Project Location: NOT GIVEN

Sampling Date: 10/24/2019  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: EXCAVATED SOIL # 2 (H903657-02)**

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/30/2019	ND	1.84	91.9	2.00	0.987	
Toluene*	<0.050	0.050	10/30/2019	ND	1.85	92.7	2.00	1.04	
Ethylbenzene*	<0.050	0.050	10/30/2019	ND	1.87	93.3	2.00	1.04	
Total Xylenes*	<0.150	0.150	10/30/2019	ND	5.57	92.9	6.00	1.03	
Total BTX	<0.300	0.300	10/30/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 97.9 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	160	16.0	10/28/2019	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/29/2019	ND	215	107	200	1.18	
DRO >C10-C28*	<10.0	10.0	10/29/2019	ND	211	106	200	1.63	
EXT DRO >C28-C36	<10.0	10.0	10/29/2019	ND					

Surrogate: 1-Chlorooctane 103 % 41-142

Surrogate: 1-Chlorooctadecane 106 % 37.6-147

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\*=Accredited Analyte

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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: 10/25/2019  
 Reported: 10/31/2019  
 Project Name: BD P-17 VENT  
 Project Number: NONE GIVEN  
 Project Location: NOT GIVEN

Sampling Date: 10/24/2019  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: EXCAVATED SOIL # 3 (H903657-03)**

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/30/2019	ND	1.84	91.9	2.00	0.987	
Toluene*	<0.050	0.050	10/30/2019	ND	1.85	92.7	2.00	1.04	
Ethylbenzene*	<0.050	0.050	10/30/2019	ND	1.87	93.3	2.00	1.04	
Total Xylenes*	<0.150	0.150	10/30/2019	ND	5.57	92.9	6.00	1.03	
Total BTX	<0.300	0.300	10/30/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 98.6 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	112	16.0	10/28/2019	ND	416	104	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/29/2019	ND	215	107	200	1.18	
DRO >C10-C28*	<10.0	10.0	10/29/2019	ND	211	106	200	1.63	
EXT DRO >C28-C36	<10.0	10.0	10/29/2019	ND					

Surrogate: 1-Chlorooctane 100 % 41-142

Surrogate: 1-Chlorooctadecane 104 % 37.6-147

Cardinal Laboratories

\*=Accredited Analyte

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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:	10/25/2019	Sampling Date:	10/24/2019
Reported:	10/31/2019	Sampling Type:	Soil
Project Name:	BD P-17 VENT	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	NOT GIVEN		

**Sample ID: EXCAVATED SOIL # 4 (H903657-04)**

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/30/2019	ND	1.84	91.9	2.00	0.987	
Toluene*	<0.050	0.050	10/30/2019	ND	1.85	92.7	2.00	1.04	
Ethylbenzene*	<0.050	0.050	10/30/2019	ND	1.87	93.3	2.00	1.04	
Total Xylenes*	<0.150	0.150	10/30/2019	ND	5.57	92.9	6.00	1.03	
Total BTEX	<0.300	0.300	10/30/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 98.4 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	112	16.0	10/28/2019	ND	416	104	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/29/2019	ND	215	107	200	1.18	
DRO >C10-C28*	<10.0	10.0	10/29/2019	ND	211	106	200	1.63	
EXT DRO >C28-C36	<10.0	10.0	10/29/2019	ND					

Surrogate: 1-Chlorooctane 102 % 41-142

Surrogate: 1-Chlorooctadecane 105 % 37.6-147

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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

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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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A handwritten signature in cursive script, appearing to read "Celey D. Keene".

---

Celey D. Keene, Lab Director/Quality Manager

**CARDINAL LABORATORIES**

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603  
 (505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

**CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

Company Name: Rice Operating				<b>BILL TO</b>				<b>ANALYSIS REQUEST</b>																																			
Project Manager: Katie Jones / Kyle Norman				P.O. #:				<div style="display: flex; flex-direction: column; align-items: center;"> <div>Chlorides</div> <div>TPH 8015 M</div> <div>BTEX</div> <div>Texas TPH</div> <div>Complete Cations/Anions</div> <div>TDS</div> </div>																																			
Address:				Company:																																							
City:		State:		Zip:		Attn:																																					
Phone #:		Fax #:		Address:																																							
Project #:		Project Owner:		City:																																							
Project Name:				State:																Zip:																							
Project Location: BD P-17 Vent				Phone #:																																							
Sampler Name: Karanja Lewis				Fax #:																																							
FOR LAB USE ONLY																																											
Lab I.D.		Sample I.D.		(G)RAB OR (C)OMP.		# CONTAINERS		MATRIX				PRESERV.		SAMPLING																													
								GROUNDWATER				WASTEWATER		SOIL		OIL		SLUDGE		OTHER:		ACID/BASE:		ICE / COOL		OTHER:		DATE		TIME													
H903657				C		1								/								/				10-24-19																	
2		Excavated Soil #2		C		1								/								/				10-24-19																	
3		Excavated Soil #3		C		1								/								/				10-24-19																	
4		Excavated Soil #4		C		1								/								/				10-24-19																	

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Relinquished By:		Date: 10-25-19		Received By:		Phone Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Add'l Phone #:	
Time: 0800		Date: 10-25-19		Received By:		Fax Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Add'l Fax #:	
Relinquished By:		Time: 0800		Received By:		REMARKS:			
Delivered By: (Circle One)		-6.8°C #97		Sample Condition		email results:			
Sampler - UPS - Bus - Other:		Corrected -6.4°C		Cool Intact		kjones@riceswd.com knorman@tasman-geo.com			
				Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		tgrieco@basinenv.com			
				Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>					

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



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October 29, 2019

KATIE JONES

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: BD P-17 VENT

Enclosed are the results of analyses for samples received by the laboratory on 10/25/19 8:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-18-11. 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". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

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: 10/25/2019  
 Reported: 10/29/2019  
 Project Name: BD P-17 VENT  
 Project Number: NONE GIVEN  
 Project Location: NOT GIVEN

Sampling Date: 10/24/2019  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: IMPORTED SOIL (H903656-01)****Chloride, SM4500Cl-B****mg/kg****Analyzed By: AC**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>16.0</b>	16.0	10/28/2019	ND	416	104	400	0.00	

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Celey D. Keene, Lab Director/Quality Manager



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### Notes and Definitions

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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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## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]

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Relinquished By: 	Date: 10-25-19 Time:	Received By: 	Phone Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Fax Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No REMARKS:
Relinquished By: 	Date: 10-25-19 Time: 0800	Received By: 	email results: kjones@riceswd.com knorman@tasman-geo.com tgrieco@basinenv.com
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	-6.8c #97 Corrected -6.4c	Sample Condition Cool Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	CHECKED BY: (Initials) TO

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

# BD P-17 vent

UL/ P, Sec.17, T21S, R37E



Began excavating, facing southeast 10/16/2019



Exposing 8" poly line, facing east 10/21/2019



Exporting excavated soil, facing northwest 10/22/2019



Importing blowsand, facing west 10/28/2019



Padding excavation, facing north 10/31/2019



Backfill complete, facing east 11/4/2019

# BD P-17 vent

UL/ P, Sec.17, T21S, R37E



Tilling, facing southeast

11/5/2019



Seeding, facing east

11/5/2019



Installing silt net fencing, facing southwest

11/5/2019



Site complete, facing southwest

11/5/2019

Final C-141

**RICE Operating Company**  
112 West Taylor, Hobbs, NM 88240  
Phone 575.393.9174

Incident ID	
District RP	1R426-132
Facility ID	
Application ID	pEJH0800238994

## Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- ☒ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☒ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☒ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☒ Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Katie Jones Davis Title: Environmental Manager

Signature: Katie Jones Davis Date: 4/21/2020

email: kjones@riceswd.com Telephone: (575) 393-9174

### OCD Only

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: Karen Collins Date: 6/18/2021

Printed Name: Karen Collins Title: Environmental Specialist

**District I**  
1625 N. French Dr., Hobbs, NM 88240  
Phone:(575) 393-6161 Fax:(575) 393-0720  
**District II**  
811 S. First St., Artesia, NM 88210  
Phone:(575) 748-1283 Fax:(575) 748-9720  
**District III**  
1000 Rio Brazos Rd., Aztec, NM 87410  
Phone:(505) 334-6178 Fax:(505) 334-6170  
**District IV**  
1220 S. St Francis Dr., Santa Fe, NM 87505  
Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS  
  
Action 8827

CONDITIONS

Operator: RICE OPERATING COMPANY 122 W Taylor Hobbs, NM 88240	OGRID: 19174
	Action Number: 8827
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
kcollins	None	6/18/2021