

1R - 427-351

WORKPLANS

Date:

5-24-11

Rice Environmental Consulting & Safety

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

CERTIFIED MAIL
RETURN RECEIPT NO. 7008 1140 0001 3070 5818

May 24th, 2011

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

2011 MAY 25 AM 11:50
RECEIVED-OCDD

**RE: INVESTIGATION & CHARACTERIZATION PLAN
Rice Operating Company – EME SWD System
EME H-7 EOL (1R427-351): UL/H sec. 7 T20S R37E
(formerly EME I-7 EOL)**

Mr. Hansen:

RICE Operating Company (ROC) has retained Rice Environmental Consulting and Safety (RECS) to address potential environmental concerns at the above-referenced site in the EME Salt Water Disposal (SWD) system. The site was previously referred to as the EME I-7 EOL. However, GIS mapping shows the site to be located within unit letter H rather than unit letter I (Figure 1). To reflect the geographical location of the site, the name has been changed to the EME H-7 EOL. All future correspondence will reference EME H-7 EOL.

ROC is the service provider (agent) for the EME SWD System and has no ownership of any portion of the pipeline, well, or facility. The system is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage/usage basis. Environmental projects of this nature require System Party AFE approval prior to work commencing at the site. In general, project funding is not forthcoming until NMOCD approves the work plan. Therefore, your timely review of this submission is greatly appreciated.

For all such environmental projects, ROC will choose the path forward that:

- Protects public health,
- Provides the greatest net environmental benefit,
- Complies with NMOCD Rules, and
- Is supported by good science.

Each site shall generally have three submissions:

1. This Investigation and Characterization Plan (ICP) is proposed for gathering data and site characterization and assessment.

2. Upon evaluating the data and results from the ICP, a recommended remedy will be submitted in a Corrective Action Plan (CAP) if warranted.
3. Finally, after implementing the remedy, a Termination Request with final documentation will be submitted.

Background and Previous Work

The site is located approximately 2.5 miles south-west of Monument, New Mexico at UL/H sec. 7 T20S R37E as shown on the Site Location Map (Figure 2). NM OSE records indicate that groundwater will likely be encountered at a depth of approximately 26 +/- feet.

In 2010 ROC initiated work on the former EME H-7 EOL junction box. The site was delineated using a backhoe to form a 30 ft x 30 ft x 12 ft deep excavation and soil samples were screened at regular intervals for both hydrocarbons and chlorides. From the excavation, the four-wall composite, the bottom composite and the backfill were taken to a commercial laboratory for analysis. Laboratory tests of the four-wall composite showed a chloride reading of 384 mg/kg and negligible gasoline range organics (GRO) and a diesel range organics (DRO). The bottom composite showed a chloride laboratory reading of 624 mg/kg and negligible GRO and DRO readings. The excavated soil was blended on site. Laboratory analysis of the blended backfill showed a chloride reading of 352 mg/kg and negligible GRO and DRO readings. At 12-11 ft below ground surface (bgs), a 1 foot clay layer was installed to inhibit downward migration of chlorides in the soil. A clay compaction test was performed on March 25th, 2010. The remaining excavation was backfilled with the blended backfill to ground surface. The area was contoured to the surrounding landscape and seeded.

To further investigate the site, a soil bore was advanced 10 ft south of the former junction box (source) on June 10th, 2010 to 24 ft bgs with samples collected every three feet. The samples were field tested for both chlorides and hydrocarbons. The 21 ft and 24 ft samples were taken to a commercial laboratory to be analyzed. Both samples showed negligible GRO and DRO readings. Chloride concentrations showed 912 mg/kg in the 21 ft sample and 1,120 mg/kg in the 24 ft sample. The bore was plugged in entirety with bentonite.

NMOCD was notified of potential groundwater impact on October 5th, 2010 and a junction box disclosure report (Appendix A) was submitted to NMOCD with all the 2010 junction box closures and disclosures.

ROC proposes additional investigative work at the site to determine if there is potential for groundwater degradation from residual chlorides at the site.

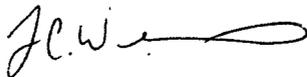
Proposed Work Elements

1. Conduct vertical and lateral delineation of residual soil hydrocarbons and chlorides from samples taken using a drill rig, hand auger, and/or backhoe (see Appendix B for Quality Procedures).
 - a. Vertical sampling will be conducted until the following criteria are met in the field.
 - i. Three samples in which the chloride concentration decreases and the third sample has a chloride concentration of ≤ 250 ppm; and,
 - ii. Three samples in which PID readings decrease and the third sample has a PID reading of ≤ 100 ppm; or,
 - iii. The sampling reaches the capillary fringe.
 - b. Lateral sampling will be conducted until the following criteria are met in the field.
 - i. A decrease is observed in chloride concentrations between lateral bores at similar depths; and,
 - ii. A chloride concentration of ≤ 250 ppm is observed in a lateral surface sample; or,
 - iii. Safety concerns impede further lateral delineation.
2. If warranted, install a monitor well to provide direct measurement of the potential groundwater impact at the site. (All monitor wells will be installed by EPA, NMOCD, and industry standards.)
3. Evaluate the risk of groundwater impact based on the information obtained.

If the evaluation of the site shows no threat to groundwater from residual chlorides, then only a vadose zone remedy will be undertaken. However, if groundwater shows impact from residual chlorides, a CAP will be developed to address these concerns.

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

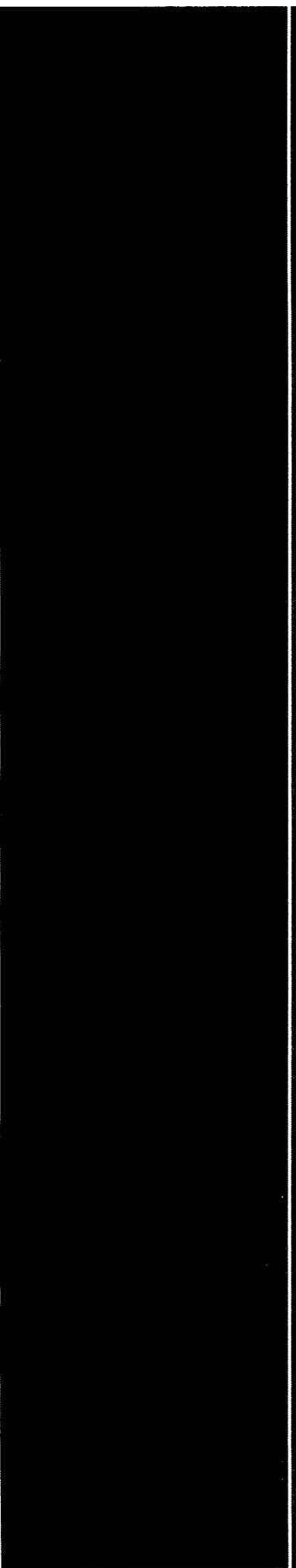
Sincerely,



Lara Weinheimer
Project Scientist
RECS
(575) 441-0431

Attachments:

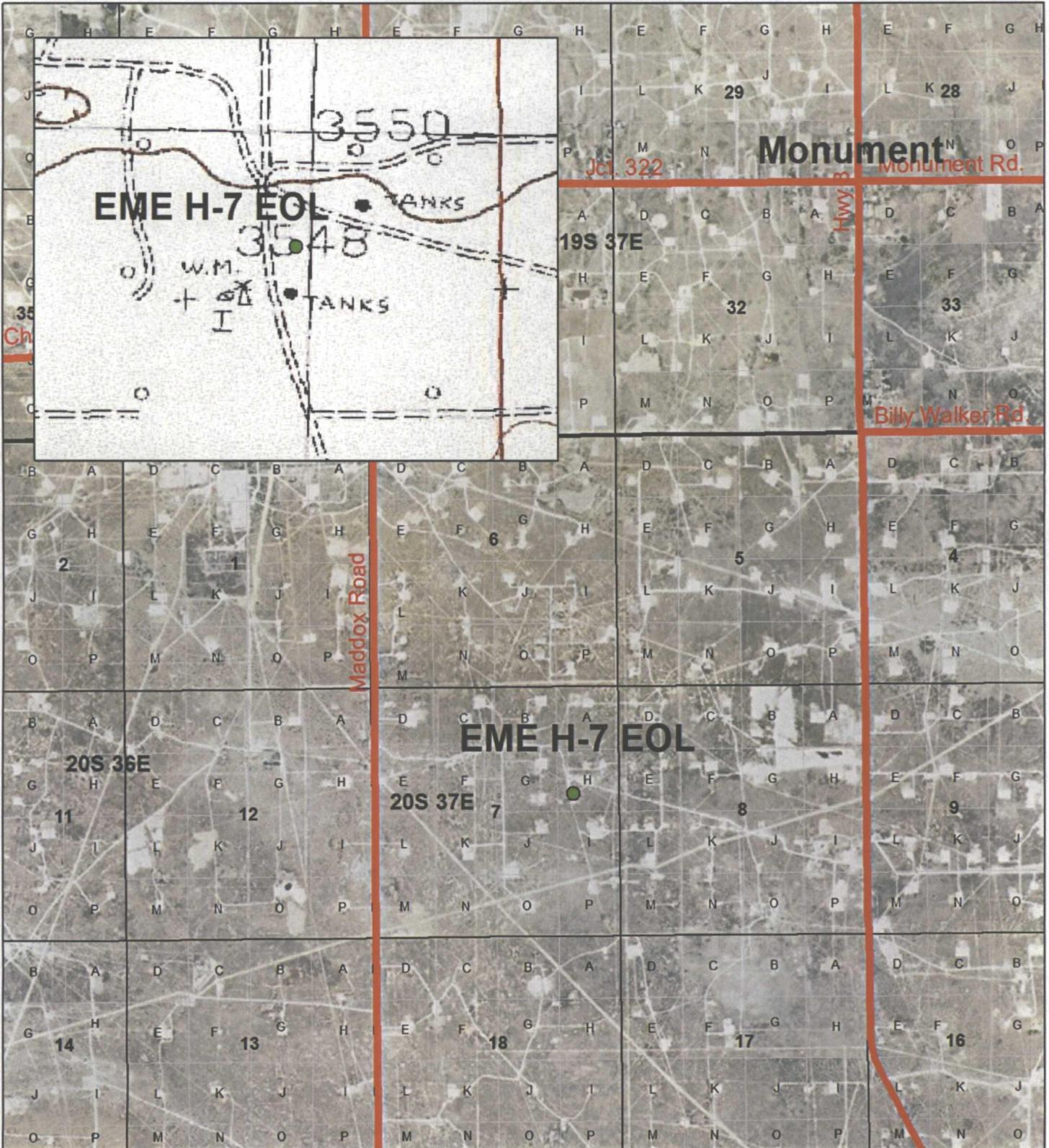
- Figures – Site location map
- Appendix A – Junction Box Disclosure Report
- Appendix B – Quality Procedures



Figures

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

Geographical Site Map

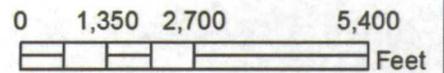


EME H-7 EOL

LEGALS: UL/H sec. 7
T20S R37E

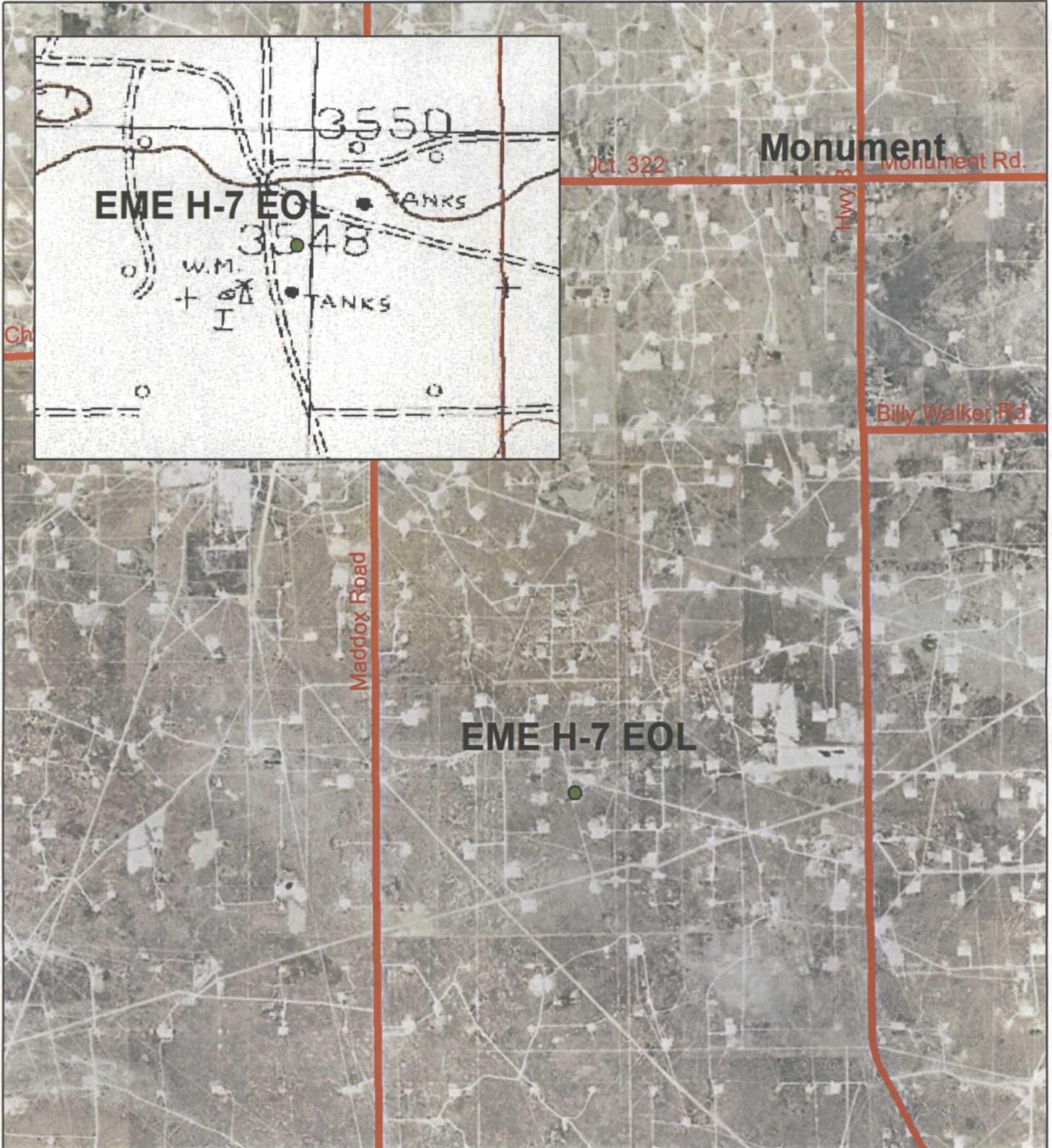
NMOCD Case #: 1R427-351

Figure 1



Drawing date: 5-23-11
Drafted by: L. Weinheimer

Site Map

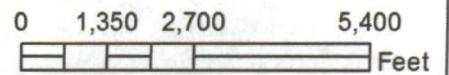


EME H-7 EOL

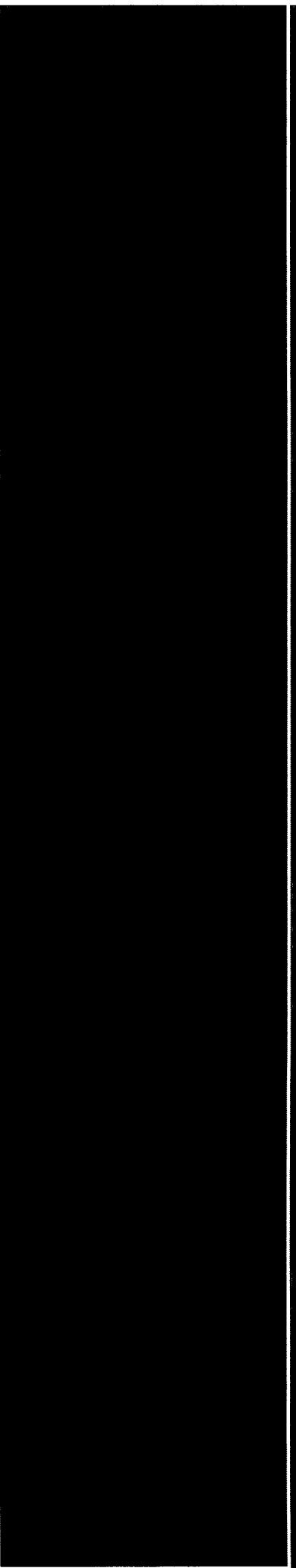
LEGALS: UL/H sec. 7
T20S R37E

NMOCD Case #: 1R427-351

Figure 2



Drawing date: 5-23-11
Drafted by: L. Weinheimer



Appendix A

Junction Box Disclosure Report

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

RICE OPERATING COMPANY
JUNCTION BOX DISCLOSURE REPORT

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
							Length 4 ft	Width 4 ft	Depth 3 ft
Eunice Monument Eumont (EME)	I-7 EOL	1	7	20S	37E	Lea	eliminated		

LAND TYPE: BLM STATE FEE LANDOWNER James Dells Barber & Jimmie Cooper OTHER

Depth to Groundwater 26 feet NMOCD SITE ASSESSMENT RANKING SCORE: 40*

Date Started 2/26/2010 Date Completed 6/10/2010 OCD Witness no

Soil Excavated 400 0 cubic yards Excavation Length 30 Width 30 Depth 12 feet

Soil Disposed 112 cubic yards Offsite Facility Sundance Services, C & C Landfarm Location Eunice, NM, Monument, NM

FINAL ANALYTICAL RESULTS: Sample Date 3/17/2010, 6/10/2010 Sample Depth 12 ft., 21 ft., 24 ft.

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

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
4-WALL COMP.	0.0	<10.0	<10.0	384
BOTTOM COMP.	0.0	<10.0	<10.0	624
BACKFILL COMP.	0.2	<10.0	<10.0	352
SB # 1 @ 21 ft.	18.8	<10.0	<10.0	912
SB # 1 @ 24 ft.	23.1	<10.0	<10.0	1,120

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
4-wall comp.	n/a	286
bottom comp.	12'	688
backfill comp.	n/a	441
background	6"	121
SB # 1 at 10 ft. south of former junction (source)	15'	797
	18'	637
	21'	889
	24'	925

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

during the pipeline replacement/upgrade program. After the former junction box was

removed, an investigation was conducted using a backhoe to collect samples at regular

intervals creating a 30X30X12-ft. deep excavation. Chloride field test on each sample yielded chloride concentrations that did not relent with

depth. Organic vapors were measured using a PID, which yielded low concentrations. The excavated soil was blended on site and

representative samples were collected and from the blended backfill, the bottom of the excavation, and the excavation walls. The representative

were sent to a commercial laboratory for analysis of chloride and TPH. At 12-11 ft. below ground surface (BGS), a 1-ft. thick clay layer was

installed with compaction test performed on 3/25/2010. The remaining excavation was backfilled with the blended backfill to ground surface

and contoured to the surrounding area. On 5/05/2010, the site was seeded with a blend of native vegetation and is expected to return to a

productive capacity at a normal rate. To further investigate the depth of chloride presence, a soil bore was initiated on 6/10/2010. The boring

was advanced to 24 ft. BGS with soil samples collected every 3 ft. between 15 ft.-24 ft. Chloride field test performed on each sample yielded

chloride concentrations that did not relent with depth. Organic vapors were measured using a PID, which yielded relatively low concentrations

The 21 ft. and 24 ft. samples were taken to a commercial laboratory for analysis of chloride and TPH. The entire bore hole was plugged with

bentonite to ground surface. NMOCD was notified of potential groundwater impact on 10/05/2010.

* inactive windmill 290 ft. west

ADDITIONAL EVALUATION IS HIGH PRIORITY

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

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

SITE SUPERVISOR Jordan Woodfin SIGNATURE Jordan Woodfin COMPANY RICE OPERATING COMPANY

REPORT

ASSEMBLED BY Larry Bruce Baker Jr. INITIAL LBB

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE Larry Bruce Baker Jr. DATE 2-28-11

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

EME I-7 EOL

Unit I, Section 7, T20S, R37E



Site prior to Delineation

2/26/2010



Compaction test

3/25/2010



Clay liner installed

3/25/2010



Seeding site

5/05/2010



Drilling soil bore # 1

6/10/2010

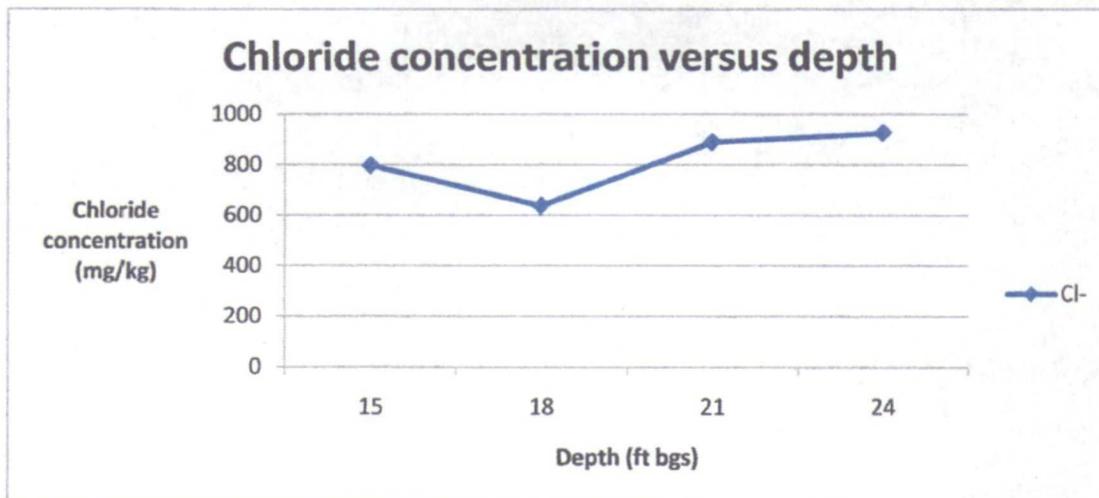


Soil bore # 1 plugged with bentonite

6/10/2010

Logger:	Jordan Woodfin		
Driller:	Harrison & Cooper, Inc. Drilling		
Consultant:	N/A junction box upgrade plan		
Drilling Method:	Air rotary		
Start Date:	6/10/2010		
End Date:	6/10/2010	Project Name: EME I-7 EOL	Well ID: SB-1
Comments: All samples from cuttings. Located 10 ft south of the former junction box site.		Location: UL/I sec. 7 T20S R37E	
Drafted by: Lara Weinheimer		Lat: 32°35'18.715"N County: Lea	
TD = 24 ft		DGW = 26 ft	
		Long: 103°17'6.679"W State: NM	

Depth (feet)	chloride field tests	LAB	PID	Description	Lithology	Well Construction
				12 - 15 ft		
				SAND		
15 ft	797		10.1	tan		
				15 - 18 ft		
				SAND		
18 ft	637		16.4	dark tan		
				18 - 21 ft		
				SAND		
21 ft	889	Cl- 912	18.8	tan		
		GRO <10		21 - 24 ft		
		DRO <10				
24 ft	925	Cl- 1120	23.1			SAND
		GRO <10				dark tan
		DRO <10				





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 Company		P.O. #:		ANALYSIS REQUEST																		
Project Manager: Hack Conder		Company:		Chlorides	TPH 8015 M																	
Address: 122 West Taylor		Attn:				BTEX	Texas TPH															
City: Hobbs State: NM Zip: 88240		Address:						Complete Cations/Anions														
Phone #: 393-9174 Fax #: 397-1471		City:																				
Project #: Project Owner:		State: Zip:																				
Project Name: EME I-7 EOL		Phone #:																				
Project Location: EME I-7 EOL		Fax #:																				
Sampler Name: Jordan Woodfin																						
FOR LAB USE ONLY																						
Lab I.D.	Sample I.D.	(C)RAB OR (C)OMP.	# CONTAINERS																			MATRIX
				GROUNDWATER																		DATE
				WASTEWATER																		
				SOIL																		
				OIL																		
				SLUDGE																		
				OTHER:																		
				ACID/BASE																		
				ICE / COOL																		
				OTHER:																		
HZDDRS-1	SB # 1 @ 21'	9	1			6/10/10	03:13	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>													
2	SB # 1 @ 24"	9	1			6/10/10	03:17	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>													

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 the client for the 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 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 services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By: <i>Jordan Woodfin</i>	Date: 6-11-10 Time: 7:20	Received By: <i>JC</i>	Phone Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Phone #:
Relinquished By: <i>JC</i>	Date: 6-11-10 Time: 9:06	Received By: <i>Jodi Newson</i>	Fax Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Fax #:
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	Sample Condition Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/> <input type="checkbox"/> Yes <input type="checkbox"/> No	CHECKED BY: <i>JH</i> (Initials)	REMARKS: email results Hconder@riceswd.com; jwoodfin@riceswd.com; Lweinheimer@riceswd.com	

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

#26

NEED SAMPLES BACK, PLEASE

RICE OPERATING COMPANY

122 West Taylor Hobbs, NM 88240
 PHONE: (575) 393-9174 FAX: (575) 397-1471
 PID METER CALIBRATION & FIELD REPORT FORM

Check Model Number

Model: PGM 7300 Serial No: 590-000183
 Model: PGM 7300 Serial No. 590-000508
 Model: PGM 7300 Serial No: 590-000504

Model: PGM 7600 Serial No: 110-023920
 Model: PGM 7600 Serial No: 110-013744
 Model: PGM 7600 Serial No: 110-013676

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOTNO 927041	EXPIRATION DATE: 11-12-12
FILL DATE: 11-17-09	METER READING ACCURACY: 100

ACCURACY : +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	I-7 ECL	I	7	20 S	37E

SAMPLE ID	PID	SAMPLE ID	PID
SB#1			
15'	10.1		
18'	16.4		
21'	18.8		
24'	23.1		

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

SIGNATURE *C. Jordan Woolf*

DATE 10-10-10



**ARDINAL
LABORATORIES**

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

ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: BRUCE BAKER
122 W TAYLOR
HOBBS, NM 88240

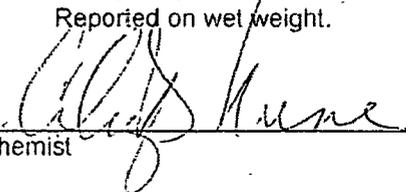
COPY

Receiving Date: 03/17/10
Reporting Date: 03/22/10
Project Number: NOT GIVEN
Project Name: EME I-7 EOL (20/37)
Project Location: EME I-7 EOL (20/37)

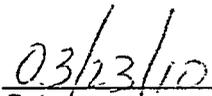
Sampling Date: 03/17/10
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: JH
Analyzed By: AB/HM

LAB NUMBER	SAMPLE ID	GRO	DRO	Cl ⁻
		(C ₆ -C ₁₀) (mg/kg)	(>C ₁₀ -C ₂₉) (mg/kg)	(mg/kg)
	ANALYSIS DATE	03/20/10	03/20/10	03/19/10
H19468-1	4 WALL COMP 30x30	<10.0	<10.0	384
H19468-2	5PT. BTM COMP @ 12'	<10.0	<10.0	624
H19468-3	BLENDED BACKFILL	<10.0	<10.0	352
	Quality Control	536	558	500
	True Value QC	500	500	500
	% Recovery	107	112	100
	Relative Percent Difference	1.7	6.6	2.0

METHODS: TPH GRO & DRO EPA SW-846 8015 M, Cl⁻ Std. Methods 4500-Cl⁻B
*Analyses performed on 1:4 w.v aqueous extracts
Reported on wet weight.



Chemist



Date

H19468 TCL RICE

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of 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.



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 Company		BILL TO		ANALYSIS REQUEST																							
Project Manager: Bruce Baker		P.O. #:		Chlorides TPH 8015 M BTEX Texas TPH 																							
Address: 122 West Taylor		Company:																									
City: Hobbs State: NM Zip: 88240		Attn:																									
Phone #: 575-393-9174 Fax #: 575-397-1471		Address:																									
Project #: Project Owner:		City:																									
Project Name: EME I - 7 EOL 20137		State: Zip:																									
Project Location: EME I - 7 EOL 20137		Phone #:																									
Sampler Name: Jordan Woodfin		Fax #:																									
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													
#194681	4 Wall Comp 30x30	C	1			✓				✓		11:45a	3-17-10	✓	✓												
	- 2 Spt Btry Comp @ 12'	C	1			✓				✓		10:30a	3-17-10	✓	✓												
	- 3 Blended Backfill	C	1			✓				✓		4:00p	3-17-10	✓	✓												

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising hereunder based in contract or tort, shall be limited to the amount paid by the client for the analysis. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 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 or its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By: Jordan Woodfin	Date: 3-17-10 Time:	Received By:	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #: Add'l Fax #:
Relinquished By:	Date: 4:45 Time:	Received By: <i>Godi Henson</i>	REMARKS: email results jwoodfin@riceswd.com; jpurvis@riceswd.com bbaker@riceswd.com	
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	Sample Condition Cool Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No	CHECKED BY: (Initials) <i>JH</i>		

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

#26

NEED SAMPLES BACK, PLEASE

RICE OPERATING COMPANY

122 West Taylor Hobbs, NM 88240
 PHONE: (575) 393-9174 FAX: (575) 397-1471
 PID METER CALIBRATION & FIELD REPORT FORM

Check Model Number:

Model: PGM 7300 Serial No: 590-000183
 Model: PGM 7300 Serial No: 590-000508
 Model: PGM 7300 Serial No: 590-000504

Model: PGM 7600 Serial No: 110-023920
 Model: PGM 7600 Serial No: 110-013744
 Model: PGM 7600 Serial No: 110-013676

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 924507	EXPIRATION DATE: 7-5-12
FILL DATE: 7-1-09	METER READING ACCURACY: 100.3

ACCURACY: +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	I-7 EOL	I	7	20	37

SAMPLE ID	PID	SAMPLE ID	PID
5pt Btm Comp	0	4 Wall Comp	0
pt 1	1.4	West Wall	0
pt 2	1.2	East Wall	0.2
pt 3	1	North Wall	0
pt 4	0.3	South Wall	0
pt 5	0.3		
		Blended Backfill	0.2

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

SIGNATURE: *Jordan Woody*

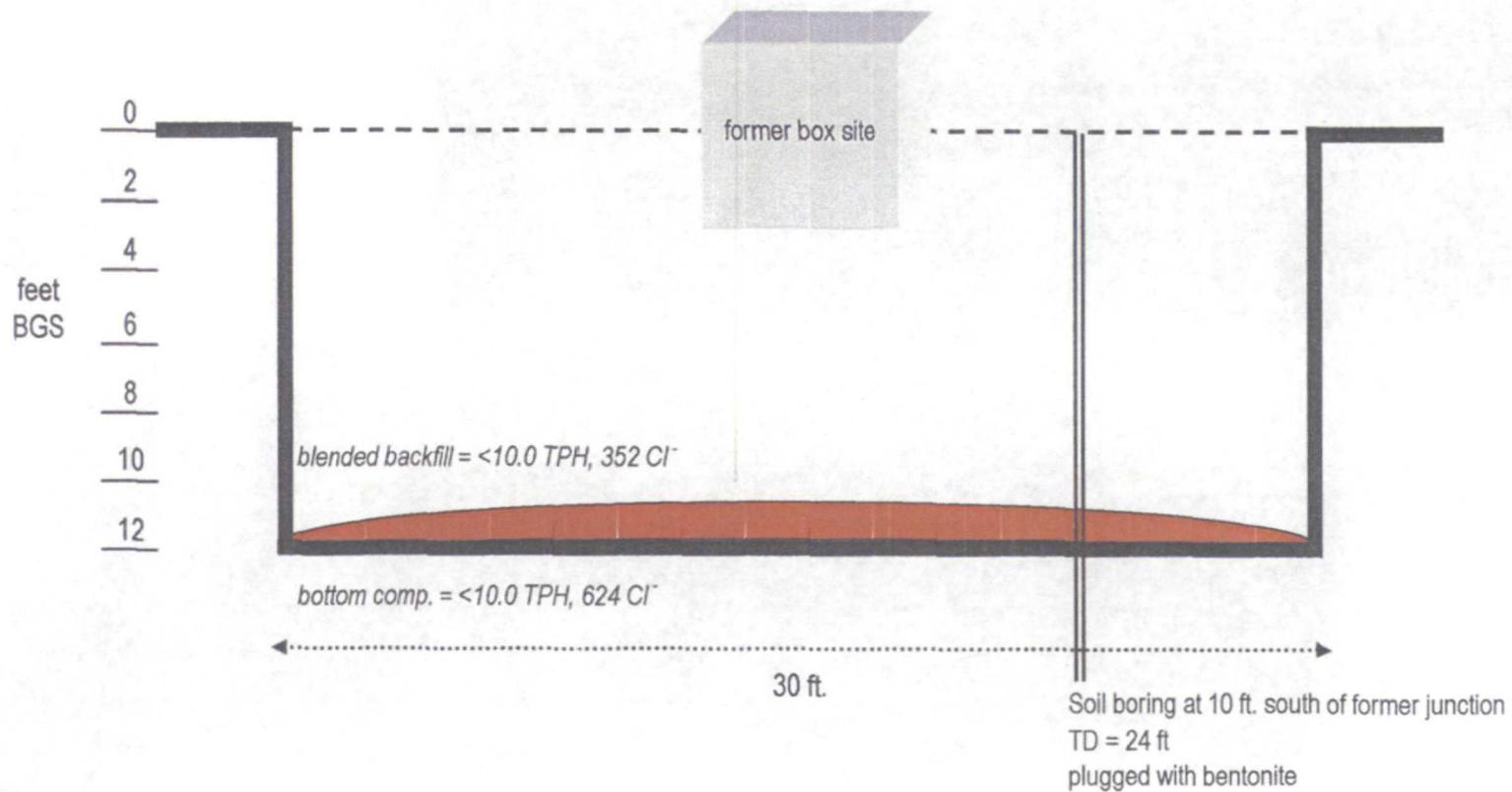
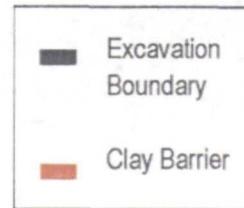
DATE: 7-17-10

EME I-7 EOL
Unit 'I', Sec. 7, T20S, R37E

Excavation Cross-Section

N

S





ETTL Engineers & Consultants Inc.

OBOTECHNICAL * MATERIALS * ENVIRONMENTAL * DRILLING * LANDFILLS

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

Project : Peillegrew & Associates, P.A., Hobbs, NM - Project #2010.1028 Report No: 1-1201-000002
 Date: 2/5/2010 Panel Number: P 2; ASTM D 6084
 Project No.: C 4536-101 Permometer Data

Boring No.:	ap = 0.031418 cm2	Eq Mercury to Direct Perm. of	Equilibrium	1.8	cm3
Sample:	sa = 0.767120 cm2		Pipet Rp	6.7	cm3
Depth (ft):	M1 = 0.030180	C = 0.900431428	Annulus Ra	1.5	cm3
Other Location: Cooper Pit Monument	M2 = 1.040953	T = 0.203778436			

Material Description: Red Clay (Your Sample No 10 1500-1502) Compacted D 698 at 95% of your M/D curve (wet side)

SAMPLE DATA

Wet Wt. sample + ring or tare :	532.08 g					
Tare or ring Wt. :	0.0 g					
Wet Wt. of Sample :	532.08 g					
Diameter :	2.78 in	7.05 cm2	Before Test	Tare No.:	T 4	
Length :	2.77 in	7.03 cm	Wet Wt.+tare:	694.63	Wet Wt.+tare:	794.08
Area :	8.05 in^2	39.02 cm2	Dry Wt.+tare:	613.98	Dry Wt.+tare:	673.61
Volume :	19.73 in^3	274.24 cm3	Tare Wt.:	219.48	Tare Wt.:	218.84
Unit Wt. (wet):	121.07 pcf	1.84 g/cm^3	Dry Wt.:	394.6	Dry Wt.:	467.17
Unit Wt. (dry):	100.62 pcf	1.81 g/cm^3	Water Wt.:	60.66	Water Wt.:	120.26
			% moist.:	20.4	% moist.:	26.3

Specific Gravity: 2.60 Max Dry Density (pcf) = 100.6628 OMC = 20.4436985
 % of max = 100.0 +/- OMC = 0.00
 Calculated % saturation: 99.89 Void ratio (e) = 0.74 Porosity (n) = 0.42

TEST READINGS

Z1 (Mercury Height Difference @ t1): 5.1 cm Hydraulic Gradient = 9.18

Date	elapsed t (seconds)	Z (pipet @ t)	ΔZ _z (cm)	temp (deg C)	α (temp corr)	k (cm/sec)	k (ft./day)	Reset = °
2/5/2010	1140	6.85	1.0072908	25	0.889	7.73E-08	2.18E-04	
2/8/2010	1320	6.5	1.1672908	25	0.889	7.82E-08	2.22E-04	
2/6/2010	1500	6.4	1.2672908	25	0.889	7.57E-08	2.16E-04	
2/5/2010	1680	6.3	1.3572908	25	0.889	7.39E-08	2.10E-04	

SUMMARY

ka = 7.83E-08 cm/sec	Acceptance criteria = 25 %
k1 = 7.73E-08 cm/sec	Vm = [ka-k1] x 100
k2 = 7.82E-08 cm/sec	ka
k3 = 7.57E-08 cm/sec	
k4 = 7.39E-08 cm/sec	

Hydraulic conductivity	k = 7.83E-08 cm/sec	2.16E-04 ft/day
Void Ratio	e = 0.74	
Porosity	n = 0.42	
Bulk Density	γ = 1.84 g/cm3	121.1 pcf
Water Content	W = 0.33	cm3/cm3 (at 20 deg C)
Intrinsic Permeability	kint = 7.82E-13 cm2	(at 20 deg C)

Liquid Limit LL _____
 Plastic Limit PL _____
 Plasticity Index PI _____
 - 200 Sieve _____ %
 + No 40 Sieve _____ %
 + No 4 Sieve _____ %

COPY

210 Beach Street
 Texarkana, AR 71854
 870-772-0013 Phone
 870-216-2413 Fax

1717 East Erwin
 Tyler, Texas 75702
 803-698-4481 Phone
 803-698-8113 Fax
 www.ettlinc.com

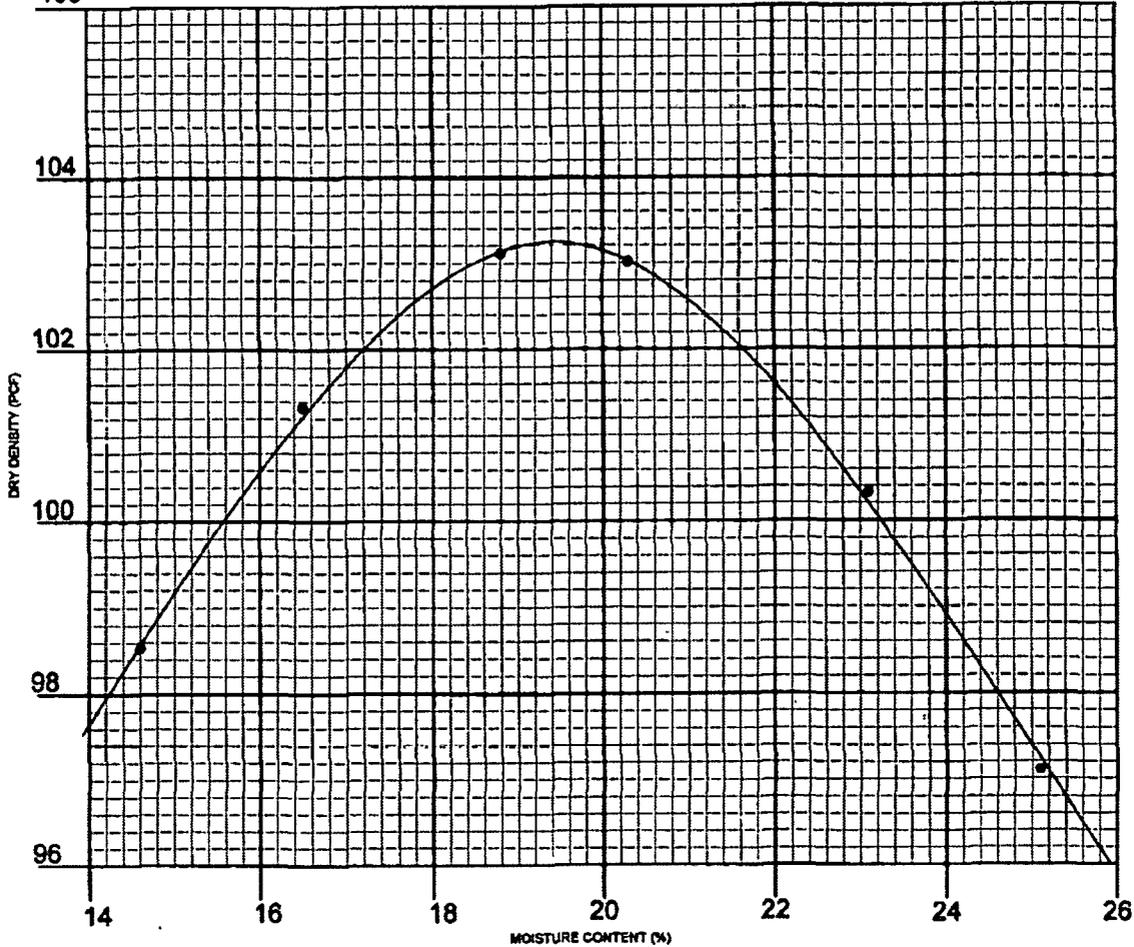
707 West Coffan Street
 Longview, Texas 75604-6505
 903-759-0916 Phone
 903-758-8246 Fax



*Corrected Copy 2/17/10
PETTIGREW & ASSOCIATES, P.A.
 1110 N. GRIMES ST.
 HOBBS, NM 88240
 (575) 393-9827



106



General Information

CLIENT: Rice Operating PROJECT: Project No. 2010.1026
 SAMPLE LOCATION: Cooper Pit Stockpile
 SOIL DESCRIPTION: Cooper Red Clay
 SOIL CLASSIFICATION: _____ TEST METHOD: ASTM: D 698
 ATTERBERG: LL _____ PI _____ Sampled & Delivered 2/8/10
 DATE: 2/12/10 LAB NO. 10 1500-1502

DRY WEIGHT LB/CU. FT. 103.2 MOISTURE CONTENT % 19.5

SIEVE ANALYSIS - % PASSING									

PETTIGREW & ASSOCIATES

COPY

BY: Eric M. Hart

COPIES: Rice Operating

BY: C. J. [Signature] P.E.



*Corrected Report 4/7/10
LABORATORY TEST REPORT
PETTIGREW & ASSOCIATES, P.A.
 1110 N. GRIMES
 HOBBS, NM 88240
 (575) 393-9827



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

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

Material: Cooper Red Clay

Test Method: ASTM: D 2922

Project: *EME I-7 EOL 20/37
 Project No. 2010.1082

Date of Test: March 25, 2010

Depth: See Below

Depth of Probe: 12"

Test No.	Location	*Dry Density % Max	% Moisture	Depth
SG 1	EME I-3 EOL 20/37	91.4	19.4	FGS

COPY

Control Density: 103.3
 ASTM: D 698

Optimum Moisture: 19.5%

Required Compaction: 90-95%

Densometer ID: 5572
 PETTIGREW & ASSOCIATES

Lab No.: 10 2307-2308

Copies To: Rice Operating

BY: Erica M. Hunt

BY: [Signature] P.E.

CHLORIDE CONCENTRATION CURVE

RICE Operating Company

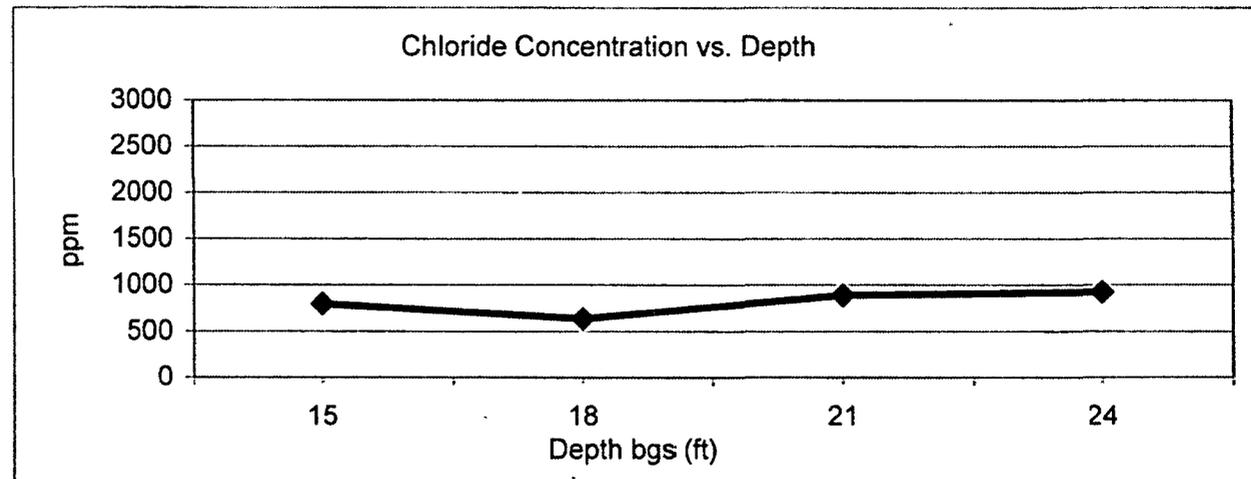
EME I-7 EOL

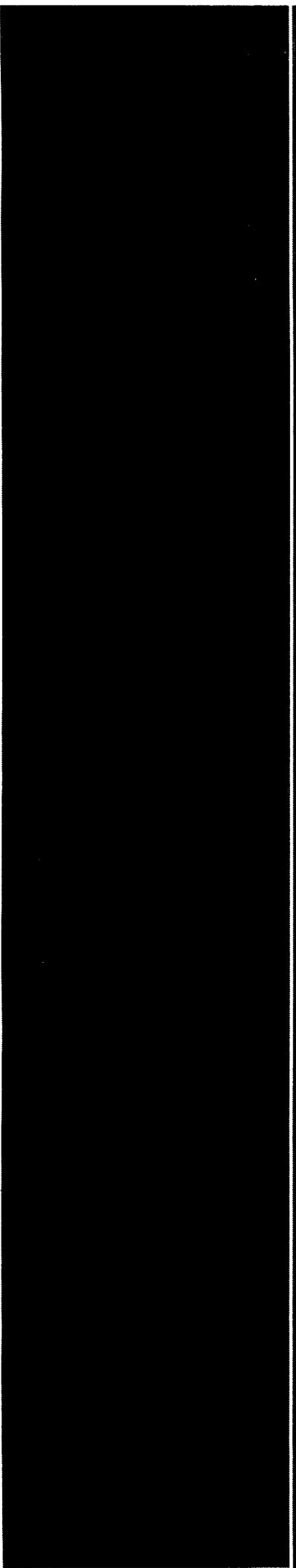
Unit 'I', Sec. 7, T20S, R37E

Soil bore 10 ft. south of former junction box (source)

Depth bgs (ft)	[Cl ⁻] ppm
15	797
18	637
21	889
24	925

Groundwater = 26 ft.





Appendix B

Quality Procedures

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

Rice Environmental Consulting and Safety

Quality Procedures

Table of Contents

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

Rice Environmental Consulting and Safety

Quality Procedure Soil Samples for Transportation to a Laboratory

1.0 Purpose

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

2.0 Scope

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

3.0 Preliminary

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

3.2 If collecting TPH, BTEX, RCRA 8 metals, cation /anions or O&G, the sample jar may be a clear 4 oz. container with Teflon lid. If collecting PAH's, use an amber 4 oz. container.

4.0 Chain of Custody

4.1 Prepare a Sample Plan. The plan will list the number, location and designation of each planned sample and the individual tests to be performed on the sample. The sampler will check the list against the available inventory of appropriate sample collection bottles to insure against shortage.

4.2 Transfer the data to the Laboratory Chain of Custody Form. Complete all sections of the form except those that relate to the time of delivery of the samples to the laboratory.

4.3 Pre-label the sample collection jars. Include all requested information except time of collection. (Use a fine point Sharpie to insure that the ink remains on the label.) Affix the labels to the jars.

5.0 Sampling Procedure

5.1 Do not touch the soil with your bare hands. Use new nitrile gloves to help minimize any contamination.

5.2 Go to the sampling point with the sample container. If not analyzing for ions or metals, use a trowel to obtain the soil.

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

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

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

6.0 Documentation

6.1 The testing laboratory shall provide the following minimum information:

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

Rice Environmental Consulting and Safety

QUALITY PROCEDURE Chloride Titration Using 0.282 Normal Silver Nitrate Solution

1.0 Purpose

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

2.0 Scope

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

3.0 Sample Collection and Preparation

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

4.0 Sample Preparation

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

5.0 Titration Procedure

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

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

5.4 Record the ml of silver nitrate used.

6.0 Calculation

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

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

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

Record all results on the delineation form.

Rice Environmental Consulting and Safety

Quality Procedure Development of Cased Water-Monitoring Wells

1.0 Purpose

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

2.0 Scope

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

3.0 Sample Collection and Preparation

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

4.0 Purging

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

5.0 Water Disposal

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

6.0 Records

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

Rice Environmental Consulting and Safety

Quality Procedure Sampling of Cased Water-Monitoring Well

1.0 Purpose

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

2.0 Scope

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

3.0 Preliminary

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

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

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

4.0 Chain of Custody

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

5.0 Bailing Procedure

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

6.0 Sampling Procedure

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

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

7.0 Documentation

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

Calculation for Determining the Minimum Bailing Volume for Monitor Wells

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

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

V=Volume

$\pi = \text{pi}$

r=inside radius of the well bore

h=maximum height of well bore in water table

Example:

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

Rice Environmental Consulting and Safety

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

1.0 Purpose

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

2.0 Scope

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

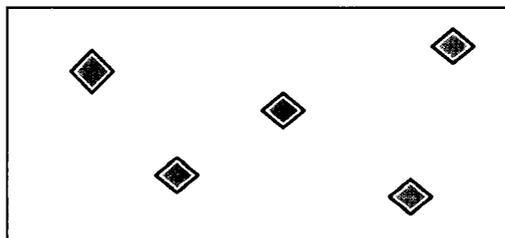
3.0 Sampling Procedure

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

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

3.2 Sidewall samples

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



- 3.2.2 Thoroughly blend these five samples in a labeled baggie.
- 3.2.3 Repeat steps 3.2.1 through 3.2.4 for each remaining sidewall.
- 3.2.4 From each labeled baggie, procure a 5 oz portion and pour into a baggie labeled "Sidewall Composite". Blend this soil mixture completely.
- 3.2.5 Obtain proper laboratory sample container for "Sidewall Composite" and continue with subparagraph 5.3 of QP – 01.

3.3 Bottom Sample

- 3.3.1 From bottom of excavation, procure a 5oz sample from each of five distinct points with distinct points resembling the "W" pattern as illustrated above.
- 3.3.2 Thoroughly blend these five samples in a clean baggie.
- 3.3.3 Obtain proper laboratory sample container for "Bottom Composite" and continue with subparagraph 5.3 of QP – 01.

Rice Environmental Consulting and Safety

QUALITY PROCEDURE Sampling and Testing Protocol for VOC in Soil

1.0 Purpose

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

2.0 Scope

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

3.0 Procedure

3.1 Sample Collection and Preparation

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

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

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

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

3.2 Sampling Procedure

3.2.1 The instrument to be used in conducting VOC concentration testing shall be a RAE Systems Photoionization device. (Device will be identified on VOC Field Test Report Form.) Prior to use, the instrument shall be zeroed-out in accordance with the appropriate maintenance and calibration procedure outlined in the instrument operation manual. The PID device will be calibrated each day it's used.

3.2.2 Carefully open one end of the collection bag and insert the probe tip into the bag taking care that the probe tip not touch the soil sample or the sidewalls of the bag.

3.2.3 Set the instrument to retain the highest result reading value. Record the reading onto the Field Test Report Form.

3.2.4 If the instrument provides a reading exceeding 100 ppm, proceed to QP-7. If the reading is 100 ppm or less, NMOCD BTEX guideline has been met and no further testing for BTEX is necessary. File the Field Test Report Form in the project file.

4.0 Clean-up

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

Rice Environmental Consulting and Safety

Quality Procedure Composite Sampling of Excavation Sidewalls and Bottoms For BTEX

1.0 Purpose

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

2.0 Scope

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

3.0 Preliminary

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

4.0 Chain of Custody

4.1 Prepare a Sample Plan. The plan will list the number, location and designation of each planned sample and the individual tests to be performed on the sample. The sampler will check the list against the available inventory of appropriate sample collection bottles to insure against shortage.

4.2 Transfer the data to the Laboratory Chain of Custody Form. Complete all sections of the form except those that relate to the time of delivery of the samples to the laboratory.

4.3 Pre-label the sample collection jars. Include all requested information except time of collection. (Use a fine point Sharpie to insure that the ink remains on the label.) Affix the labels to the jars.

5.0 Sampling Procedure

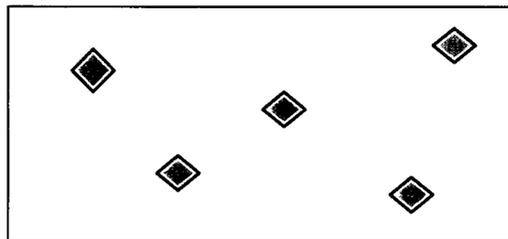
5.1. Do not touch the soil with your bare hands. Use new nitrile gloves to help minimize any cross-contamination.

5.2. If safe and within OSHA regulations, go to the sampling point with the sample container. If not analyzing for ions or metals, use a trowel to

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

5.3. Sidewall Samples

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



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

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

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

6.0 Documentation

6.1 The testing laboratory shall provide the following minimum information:

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

Rice Environmental Consulting and Safety

Procedure for Plugging & Abandonment of Cased Water Monitoring Wells

1.0 Purpose

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

2.0 Scope

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

3.0 Preliminary

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

4.0 Plugging

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

4.2 All wellheads will be removed to below ground surface.

5.0 Records

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

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

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