1R - 427-408

WORKPLANS

Date:

10-10-13

Rice Environmental Consulting & Safety
P.O. Box 2948, Hobbs, NM 88241
Phone 575.393.2967

CERTIFIED MAIL
RETURN RECEIPT NO. 7007 2560 0000 4569 8265

October 10th, 2013

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

RE: **Investigation and Characterization Plan (ICP)**
Rice Operating Company – EME SWD System
EME Jct. J-4 (1R427-408): UL/J sec. 4 T20S R37E

Mr. Hansen:

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

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 1.5 miles southeast of Monument, New Mexico at UL/J sec. 4 T20S R37E as shown on the Site Location Map and Geographical Location Map

(Figure 1 and 2). NM OSE records indicate that groundwater will likely be encountered at a depth of approximately 33 +/- feet.

In 2012, ROC initiated work on the former EME J-4 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 wall composites and the bottom composite were taken to a commercial laboratory for analysis. Laboratory tests of the north wall composite showed a chloride reading of 688 mg/kg, the south wall composite showed a chloride reading of 976 mg/kg, the east wall composite showed a chloride reading of 944 mg/kg and the west wall composite showed a chloride reading of 912 mg/kg. The gasoline range organics (GRO) readings and diesel range organics (DRO) readings of all the wall composites showed non-detect, except for the DRO readings of the south wall composite, which showed a reading of 525 mg/kg and the west wall, which showed a reading of 74.9 mg/kg. The bottom composite showed a chloride laboratory reading of 864 mg/kg and GRO and DRO readings of non-detect.

The excavated soil was blended on site and a total of 552 yards of the blended soil was taken to a NMOCD approved facility for disposal. The excavation was backfilled with imported caliche to 6 ft bgs. At 6 ft bgs, a 20-mil reinforced poly liner was installed and properly seated into the excavation. The excavation was backfilled with clean, imported top soil to the ground surface and contoured to the surrounding location. An 8 point composite from the imported top soil and caliche were taken to a commercial laboratory for analysis. The top soil returned a chloride value of 80 mg/kg and the caliche returned a chloride value of 704 mg/kg.

On October 24th, 2012, the site was seeded with a blend of native vegetation and is expected to return to a production capacity at a normal rate. NMOCD was notified of potential groundwater impact on March 4th, 2013 and a junction box disclosure report (Appendix A) was submitted to NMOCD with all the 2012 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 chlorides and hydrocarbons from samples taken using a drill rig, hand augur and/or backhoe (see Appendix B for Quality Procedures).
    a. Vertical sampling will be conducted until of 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 $\leq$ 250 ppm; and,
        ii. Three samples in which PID readings decrease and the third sample has a PID reading of $\leq$ 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.

RECS appreciates the opportunity to work with you on this project. Please call Hack Conder at (575) 393-2967 or me if you have any questions or wish to discuss the site.

Sincerely,

Lara Weinheimer
Project Scientist
RECS
(575) 441-0431

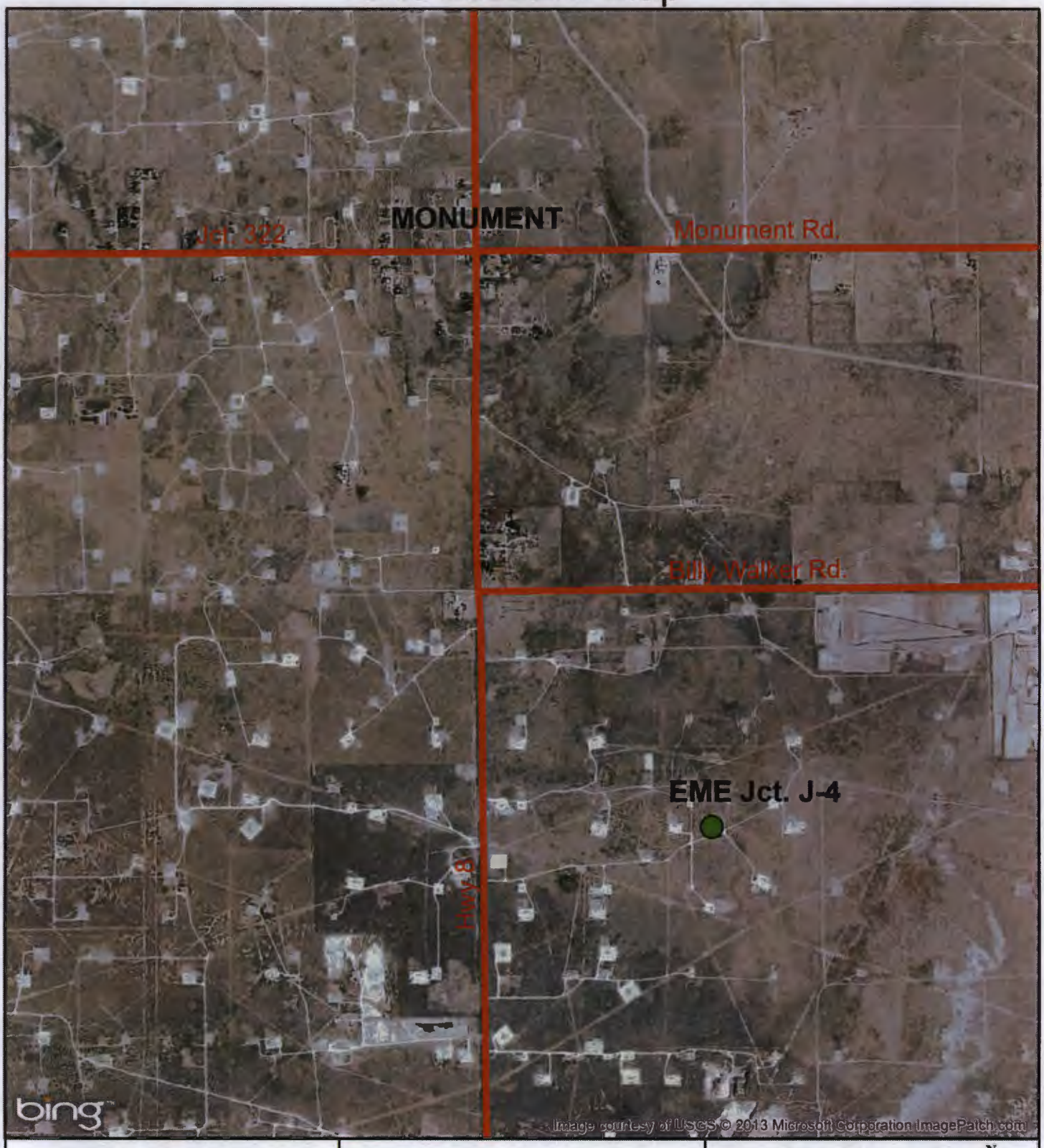
Attachments:

Figure 1 – Site Location Map
Figure 2 – Geographical Location Map
Appendix A – Junction Box Disclosure Report
Appendix B – Quality Procedures

Figures

RICE Environmental Consulting and Safety (RECS)
P.O. Box 2948, Hobbs, NM 88241
Phone 575.393.2967

Site Location Map



RICE ENVIRONMENTAL RECS CONSULTING & SAFETY, LLC

EME Jct. J-4

UL J SECTION 4
T-20-S R-37-E
LEA COUNTY, NM

NMOCD Case #: 1R427-408

Figure 1

N
W E
S

0 0.25 0.5
Miles

Drawing date: 1/17/13
Drafted by: L. Weinheimer

Geographical Location Map

RICE ENVIRONMENTAL RECS CONSULTING & SAFETY, LLC

EME Jct. J-4

UL J SECTION 4
T-20-S R-37-E
LEA COUNTY, NM

NMOCD Case #: 1R427-408

Figure 2

N
W E
S

0 0.1 0.2
Miles

Drawing date: 8/5/13
Drafted by: L. Weinheimer

Appendix A

Junction Box Disclosure Report

RICE Environmental Consulting and Safety (RECS)
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967

RICE OPERATING COMPANY
JUNCTION BOX DISCLOSURE* REPORT

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
							Length	Width	Depth
Eunice Monument Eumont (EME)	Jct. J-4	J	4	20S	37E	Lea	Eliminated		

LAND TYPE: BLM ___ STATE ___ FEE LANDOWNER Martha Laughlin Williams OTHER ___

Depth to Groundwater 33' feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 9/17/2012 Date Completed 10/15/2012 OCD Witness no

Soil Excavated 400.0 cubic yards Excavation Length 30 Width 30 Depth 12 feet

Soil Disposed 552 cubic yards Offsite Facility Sundance Services Location Eunice, NM

FINAL ANALYTICAL RESULTS: Sample Date 9/27/2012 Sample Depth 12'

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	Chloride mg/kg
BOTTOM 5PT COMP	2.6	<10	<10	864
NORTH WALL	24.1	<10	<10	688
SOUTH WALL	0.0	<50	525	976
EAST WALL	0.0	<10	<10	944
WEST WALL	0.0	<10	74.9	912
8 PT. COMP TOP SOIL	0.0	n/a	n/a	80
8 PT.COMP CALICHE	0.0	n/a	n/a	704
BLENDED BACKFILL	5.4	n/a	n/a	n/a

CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
Background	6"	86
Bottom Comp	n/a	672
North wall	n/a	770
South wall	n/a	824
East wall	n/a	720
West wall	n/a	718
Blended backfill	n/a	475
Vertical delineation trench at 10' N of the former junction (source)	2'	1442
	4'	845
	6'	771
	8'	848
	10'	985
	12'	903

General Description of Remedial Action: This junction box and line was eliminated during the pipeline replacement/upgrade program. After the former junction box was removed, an investigation was conducted using a backhoe to collect soil samples at regular intervals, producing a 30 x 30 x 12 ft deep excavation. Chloride field tests performed on soil samples did not decrease with depth. Organic vapors were measured using a PID which yielded low concentrations. The excavated soil was blended on ite and representative composite samples of the excavation walls, the excavation bottom, and the backfill were sent to a commercial laboratory for analysis of chloride and TPH. A total of 552 yards of blended backfill was transported to a NMOCD facility. On 10/12/2012, a 30x30 ft, 20-mil reinforced liner was installed at 6 ft. below ground surface (BGS). The excavation was backfilled with clean imported soil to ground surface and contoured contoured to the surrounding area. On 10/24/2012, the site was seeded with a blend of native vegetation and is expected to return to a a productive capacity at a normal rate. NMOCD was notified of potential groundwater impact on 3/4/2013.

Additional Evaluation is HIGH Priority

Enclosures: site location map, photos, laboratory analysis, PID (field) screenings, chloride graph, revegetation form

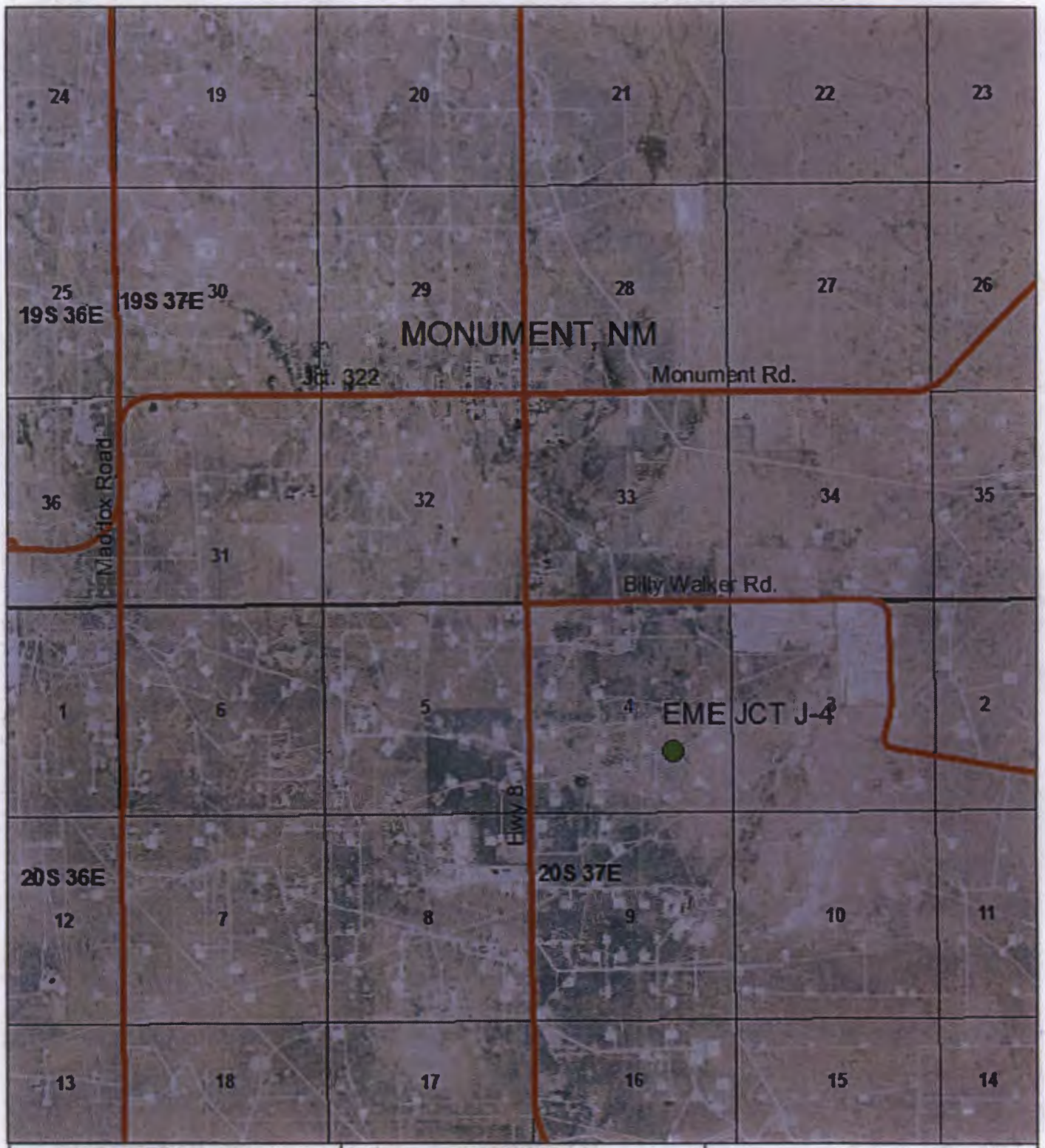
I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

REPORT ASSEMBLED BY Laura Pena SIGNATURE Laura Pena COMPANY Rice Operating

SITE SUPERVISOR Dylan Yarborough SIGNATURE ___ COMPANY Rice Environmental Consulting & Safety

PROJECT LEADER Zach Conder SIGNATURE ___ DATE 3-12-13

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



RICE ENVIRONMENTAL RECS CONSULTING & SAFETY, LLC

EME JCT J-4

UL J SECTION 4
T-20-S R-37-E
LEA COUNTY, NM

N W E S

0 0.5 1 Miles

Drawing date: 1/17/13
Drafted by: Tony Grieco

EME Jct. J-4

UL/J, Section 4, T20S,R37E

Excavating site, facing south 9/24/2012

Collecting sample, facing north 9/27/2012

Exporting soil, facing east 10/3/2012

Installing 30'x30' 20 mil plastic liner @ 6' bgs
10/12/2012

Backfilling with imported soil 10/12/2012

Seeding site, facing south 10/24/2012

CARDINAL Laboratories

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

October 04, 2012

BRUCE BAKER

RICE ENVIRONMENTAL CONSULTING & SAFETY LLC

112 W. TAYLOR

HOBBS, NM 88240

RE: EME J-4 JCT

Enclosed are the results of analyses for samples received by the laboratory on 10/01/12 7:40.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. 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.

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.

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

Celey D. Keene

Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

RICE ENVIRONMENTAL CONSULTING & SAFETY
BRUCE BAKER
112 W. TAYLOR
HOBBS NM, 88240
Fax To: (575) 397-1471

Received:	10/01/2012	Sampling Date:	09/27/2012
Reported:	10/04/2012	Sampling Type:	Soil
Project Name:	EME 3-4 1CT	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: NORTH WALL (H202383-01)

Chloride, SM4500Cl-B mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**688**	16.0	10/03/2012	ND	384	96.0	400	4.08	

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	10/03/2012	ND	188	94.2	200	4.31	
DRO >C10-C28	<10.0	10.0	10/03/2012	ND	190	95.0	200	5.79	

Surrogate: 1-Chlorooctane	*84.7 %*	*65.2-140*
Surrogate: 1-Chlorooctadecane	*82.7 %*	*63.6-154*

Sample ID: SOUTH WALL (H202383-02)

Chloride, SM4500Cl-B mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**976**	16.0	10/03/2012	ND	384	96.0	400	4.08	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<50.0	50.0	10/03/2012	ND	188	94.2	200	4.31	
DRO >C10-C28	**525**	50.0	10/03/2012	ND	190	95.0	200	5.79	

Surrogate: 1-Chlorooctane	*82.4 %*	*65.2-140*
Surrogate: 1-Chlorooctadecane	*96.0 %*	*63.6-154*

Cardinal Laboratories

*=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

RICE ENVIRONMENTAL CONSULTING & SAFETY
BRUCE BAKER
112 W. TAYLOR
HOBBS NM, 88240
Fax To: (575) 397-1471

Received:	10/01/2012	Sampling Date:	09/27/2012
Reported:	10/04/2012	Sampling Type:	Soil
Project Name:	EME J-4 JCT	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: EAST WALL (H202383-03)

Chloride, SM4500Cl-B — mg/kg — Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**944**	16.0	10/03/2012	ND	384	96.0	400	4.08	

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	10/03/2012	ND	188	94.2	200	4.31	
DRO >C10-C28	<10.0	10.0	10/03/2012	ND	190	95.0	200	5.79	

Surrogate: 1-Chlorooctane	*88.5 %*	*65.2-140*
Surrogate: 1-Chlorooctadecane	*88.3 %*	*63.6-154*

Sample ID: WEST WALL (H202383-04)

Chloride, SM4500Cl-B — mg/kg — Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**912**	16.0	10/03/2012	ND	384	96.0	400	4.08	

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	10/03/2012	ND	188	94.2	200	4.31	
DRO >C10-C28	**74.9**	10.0	10/03/2012	ND	190	95.0	200	5.79	

Surrogate: 1-Chlorooctane	*88.0 %*	*65.2-140*
Surrogate: 1-Chlorooctadecane	*91.9 %*	*63.6-154*

Cardinal Laboratories

*=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

RICE ENVIRONMENTAL CONSULTING & SAFETY
BRUCE BAKER
112 W. TAYLOR
HOBBS NM, 88240
Fax To: (575) 397-1471

Received:	10/01/2012	Sampling Date:	09/27/2012
Reported:	10/04/2012	Sampling Type:	Soil
Project Name:	EME J-4 JCT	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: BOTTOM 5 PT. COMP (H202383-05)

Chloride, SM4500Cl-B mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	864	16.0	10/03/2012	ND	384	96.0	400	4.08	

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	10/03/2012	ND	188	94.2	200	4.31	
DRO >C10-C28	<10.0	10.0	10/03/2012	ND	190	95.0	200	5.79	

Surrogate: 1-Chlorooctane	*97.6 %*	*65.2-140*
Surrogate: 1-Chlorooctadecane	*97.2 %*	*63.6-154*

Cardinal Laboratories

*=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

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

Cardinal Laboratories

* =Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name: RECS	**BILL TO**
Project Manager:	P.O. #:
Address:	Company:
City: State: Zip:	Attn:
Phone #: Fax #:	Address:
Project #: Project Owner:	City:
Project Name:	State: Zip:
Project Location: EME J-4 JCT	Phone #:
Sampler Name:	Fax #:

FOR LAB USE ONLY Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX: GROUNDWATER, WASTEWATER, SOIL, OIL, SLUDGE, OTHER:	PRESERV.: ACID/BASE, ICE / COOL, OTHER:	SAMPLING: DATE	TIME	ANALYSIS REQUEST: Cl-1, TPH
H20232								
1	North wall	C	1		1	9/27/21	3:30	X X
2	South wall	C	1		1	9/27/21	3:35	X X
3	East wall	C	1		1	9/27/21	3:40	X X
4	West wall	C	1		1	9/27/21	3:45	X X
5	Bottom 5pt. Composite	C	1		1	9/27/21	3:50	X X

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:	Date: 10-1-12 Time: 7:40	Received By: Jodi Henson	Phone Result: ☐ Yes ☐ No Add'l Phone #:
Relinquished By:	Date: Time:	Received By:	Fax Result: ☐ Yes ☐ No Add'l Fax #:
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	Sample Condition: Cool ☑ Yes ☐ No; Intact ☑ Yes ☐ No	CHECKED BY: (Initials)	REMARKS: Bruce Baker, Hack Conder, Zach Conder, Lara Lv

† Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326

CARDINAL Laboratories

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

October 17, 2012

BRUCE BAKER

RICE ENVIRONMENTAL CONSULTING & SAFETY LLC

112 W. TAYLOR

HOBBS, NM 88240

RE: EME J-4 JCT

Enclosed are the results of analyses for samples received by the laboratory on 10/15/12 16:20.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. 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.

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.

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

Celey D. Keene

Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

RICE ENVIRONMENTAL CONSULTING & SAFETY
BRUCE BAKER
112 W. TAYLOR
HOBBS NM, 88240
Fax To: (575) 397-1471

Received:	10/15/2012	Sampling Date:	10/15/2012
Reported:	10/17/2012	Sampling Type:	Soil
Project Name:	EME J-4 JCT	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: 8 PT. COMP TOPSOIL (H202505-01)

Chloride, SM4500Cl-B **mg/kg** **Analyzed By: AP**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**80.0**	16.0	10/17/2012	ND	400	100	400	0.00	

Sample ID: 8 PT. COMP CALICHE (H202505-02)

Chloride, SM4500Cl-B **mg/kg** **Analyzed By: AP**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**704**	16.0	10/17/2012	ND	400	100	400	0.00	

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

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

Cardinal Laboratories

*=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name:	RECS
Project Manager:	Zach Conder
Address:	
City:	State: Zip:
Phone #:	Fax #:
Project #:	Project Owner:
Project Name:	
Project Location:	EME J-4 Jct
Sampler Name:	

BILL TO

P.O. #:	
Company:	
Attn:	
Address:	
City:	
State:	Zip:
Phone #:	
Fax #:	

ANALYSIS REQUEST

FOR LAB USE ONLY Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP	# CONTAINERS	MATRIX: GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER	PRESERV: ACID/BASE	ICE / COOL	OTHER	SAMPLING DATE	SAMPLING TIME	
H202505															C
1	Spt. Comp Topsoil	C	1			X					X		10/15/12	10:50	X
2	Spt. Comp Caliche	C	1			X					X		10/15/12	10:55	X

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:	Date: 10/15/12 Time: 4:20	Received By: Jodi Henson	Phone Result: ☐ Yes ☐ No Add'l Phone #:
Relinquished By:	Date:	Received By:	Fax Result: ☐ Yes ☐ No Add'l Fax #:
	Time:		REMARKS: Hack Conder Zach Conder Bruce Baker Lara W Laura Pena
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	Sample Condition: Cool: Yes / No; Intact: Yes / No	CHECKED BY: (Initials)	

† Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326

#26

RICE ENVIRONMENTAL CONSULTING & SAFETY

122 West Taylor Hobbs. NM 88240
PHONE: (505) 393-9174 FAX: (505) 397-1471
PID METER CALIBRATION & FIELD REPORT FORM

CK. MODEL NO.			
	MODEL: PGM 7300	SERIAL NO: 590-000508
✓	MODEL: PGM 7300	SERIAL NO: 590-000504
	MODEL: PGM 7320	SERIAL NO: 592-903318
	MODEL: PGM 7300	SERIAL NO: 590-000183

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO :HAL-248-100-1	EXPIRATION DATE:7/1/2015
METER READING ACCURACY:100	

ACCURACY : +/- 2%

COMPANY
RICE OPERATING

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	JCT J-4	J	4	1-20-S	R-37-E

SAMPLE ID	PID	SAMPLE ID	PID
NORTH WALL	24.1		
SOUTH WALL	0		
EAST WALL	0		
WEST WALL	0		
BOTTOM 5PT. COMPOSITE	2.6		
BLENDED BACKFILL	5.4		

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

SIGNATURE

DATE: 9/27/2012

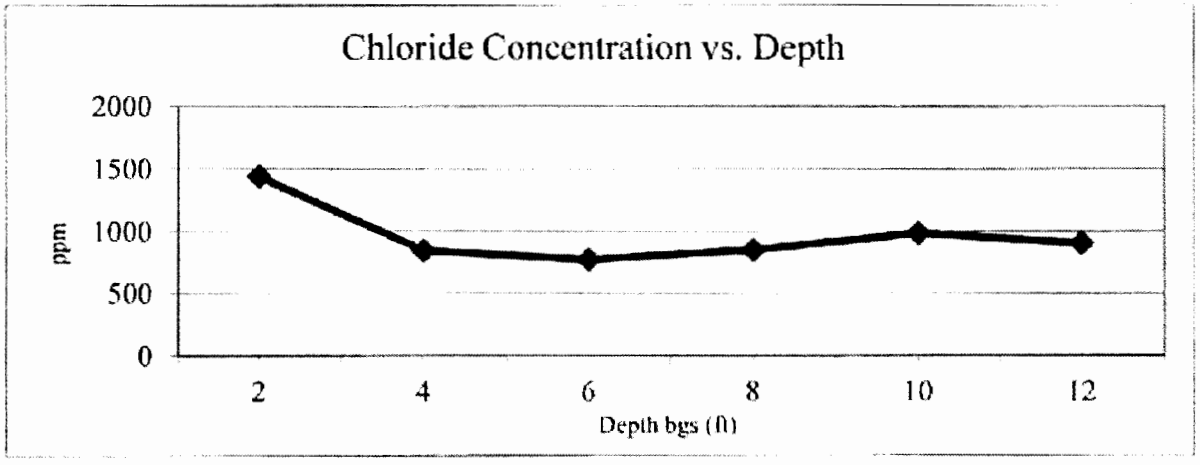
EME Jct. J-4

Unit 'J', Sec. 4, T20S, R37E

Backhoe samples at 10' N of the junction (source)

Depth bgs (ft)	[Cl⁻] ppm
2	1442
4	845
6	771
8	848
10	985
12	903

Groundwater = 33 ft.



PO Box 5630
Hobbs, NM 88241
Phone: (575) 393-4411
Fax: (575) 393-0293

REVEGETATION FORM

1. General Information

Site name: EME Jct. J-4						
U/L J	Section 4	Township 20S	Range 37E	County Lea	Latitude N 32°35'57.465	Longitude W 103°15'11.989
Contact Name: ZACHARY CONDER						
Email: zconder@rice-ecs.com						
Site size: 60x65 Square feet: 4,C00			Map detail of site attached ☐			
Additional information:						

2. Soils **Do not rip caliches subsoils; caliche rocks brought to the surface by ripping shall be removed.*

Salvaged from site ☐	Bioremediated ☐	Imported ☒	Blended ☐	Depth (in):
Texture:	Describe soil & subsoil:			
Soil prep methods:	Rip ☐ Depth(in):	Disc ☐ Depth (in):		Roller pack ☐
Date completed: 10/15/2012				

3. Bioremediation

Fertilizer ☐	Hay ☐	Other ☐
Type:		Describe:
Lbs/acre:		

4. Seeding **Attach seed bag tags to this form. Seed bag tags shall contain the site name and S-T-R.*

Custom seed mix ☒	Prescribed mix ☐	Seed mix name: Blue Grama and Side Oats Seeding date: 10/24/2012
Broadcast ☒ Method: Drop Seeder		
Soil conditions during seeding: Dry ☒ Damp ☐ Wet ☐		
Photos attached ☐ Number of photos:	Observations: 3 lbs Blue Grama and 3lbs of Side Oats	

5. Certification I hereby certify that the information in this form and attachments is true and complete to the best of my knowledge and belief.

Name: Edward Garcia	Title: Environmental Tech	Date: 10/24/2012
Signature: Edward Garcia		

Appendix B
Quality Procedures

RICE Environmental Consulting and Safety (RECS)
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967

Rice Environmental Consulting and Safety

Quality Procedures

Table of Contents

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=gal] X 3 = Purge Volume

V=Volume
π=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.

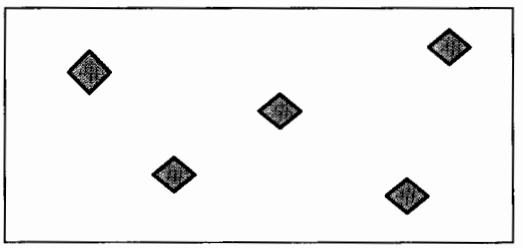
3.0 Sampling Procedure

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, (59-77 ^{0}F). 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

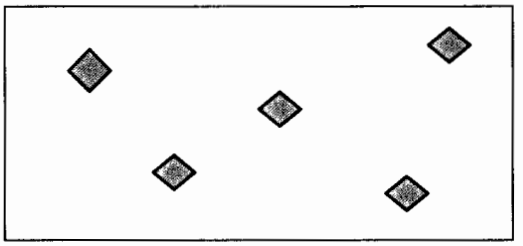
5.1. Do not touch the soil with your bare hands. Use new nitrile gloves to help minimize any cross-contamination.

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.