

BD Jct. G-31

2013

DISCLOSURE

**RICE OPERATING COMPANY
JUNCTION BOX DISCLOSURE* REPORT**

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
Blaineby-Drinkard (BD)	Jct. G-31	G	31	22S	38E	Lea	Length 5'	Width 7'	Height 3'
							Moved 125' east		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER D.K. Boyd OTHER _____

Depth to Groundwater 40 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 11/12/2013 Date Completed 1/7/2014 OCD Witness no

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

Soil Disposed 528 cubic yards Offsite Facility Sundance Services Location Eunice, NM

FIELD SOURCE RESULTS: Sample Date 11/21/13, 12/3/13, Sample Depth 12 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.	0.8	<50	112	3720
BOTTOM COMP.	0.9	<10	42.3	3080
BLENDED BACKFILL	0.0	<10	45.5	3280

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
4 wall comp.	n/a	2797
bottom comp.	12'	2186
vertical delineation trench at the junction (source) @ 12'	3'	1191
	4'	1493
	5'	1966
	6'	1340
	7'	1863
	8'	1580
	9'	1131
	10'	2250
	11'	1663
	12'	2099

General Description of Remedial Action: This junction box 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 30x30x12 ft deep excavation. Chloride field tests performed on each sample resulted in 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 composite samples of the excavation bottom, the excavation walls, and the blended backfill were sent to a commercial laboratory for analysis of chloride and TPH. A total of 528 yards of contaminated soil was transported to a NMOCD approved disposal facility. On 11/26/13, a 20-mil reinforced poly liner was installed in between a 6" pad below and above the liner. The excavation was benched 5 ft to the north, east and west direction, creating a 35x40x12 ft deep excavation. The excavation was backfilled to 5 ft bgs with blended backfill. On 12/9/13, a second 20 mil-reinforced plastic liner was installed at 4.5 ft bgs, in between a 6" pad below and above the liner. The remainder of the excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area. On 1/7/14, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate. A new watertight junction box was built 125 ft east. NMOCD was notified of potential groundwater impact on 2/13/14.

Enclosures: site location map, area map, photos, lab results, PID (field screenings), chloride graph, excavation cross-section, revegetation form

Additional evaluation is **HIGH** priority.

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

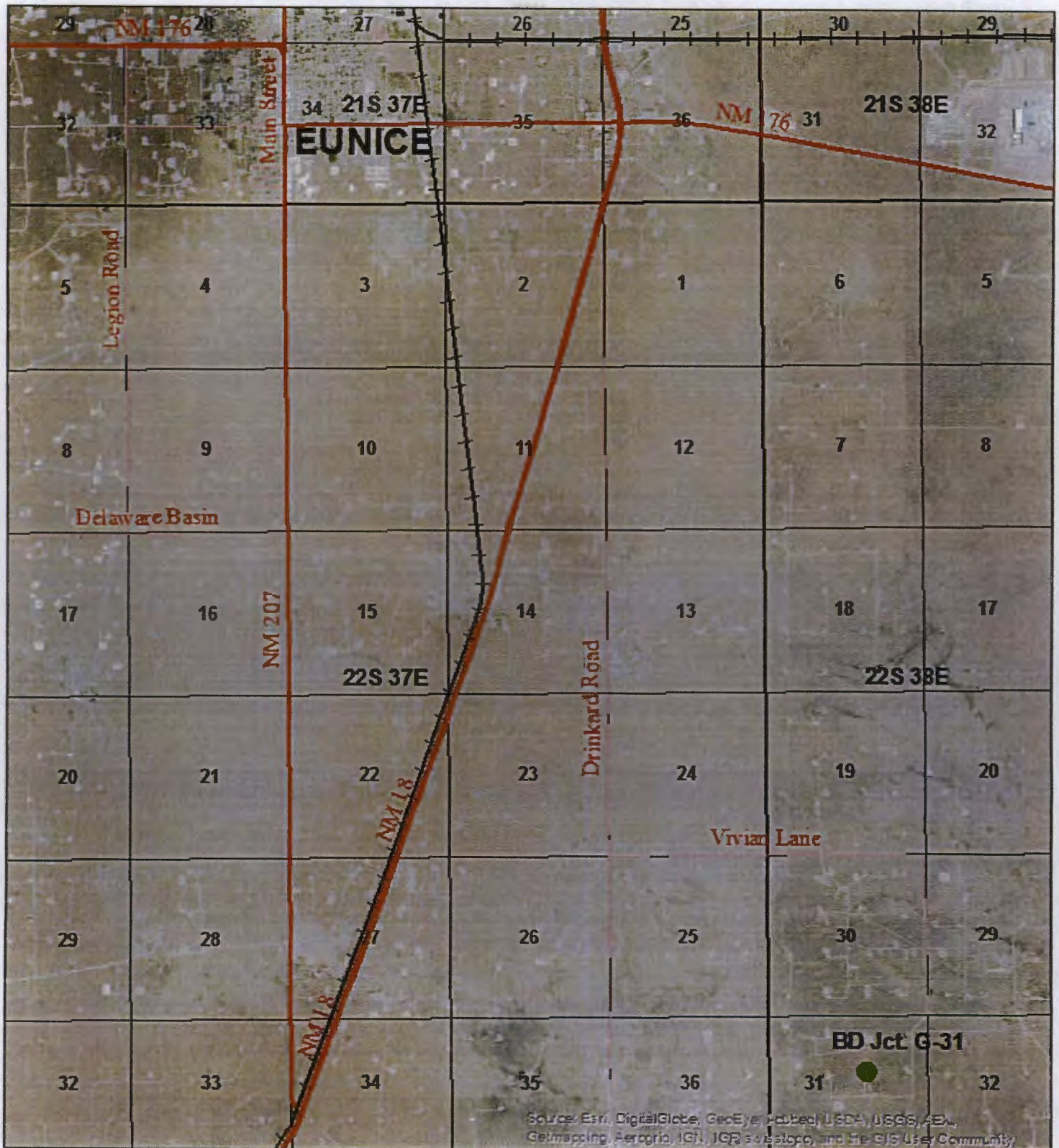
REPORT ASSEMBLED BY Laura Flores SIGNATURE *Laura Flores* COMPANY Rice Environmental Consulting & Safety

SITE SUPERVISOR Dyllan Yarbrough SIGNATURE Not Available COMPANY Rice Environmental Consulting & Safety

PROJECT LEADER Kyle Norman SIGNATURE *Kyle N* DATE 3-3-14

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

Site Map



BD Jct. G-31

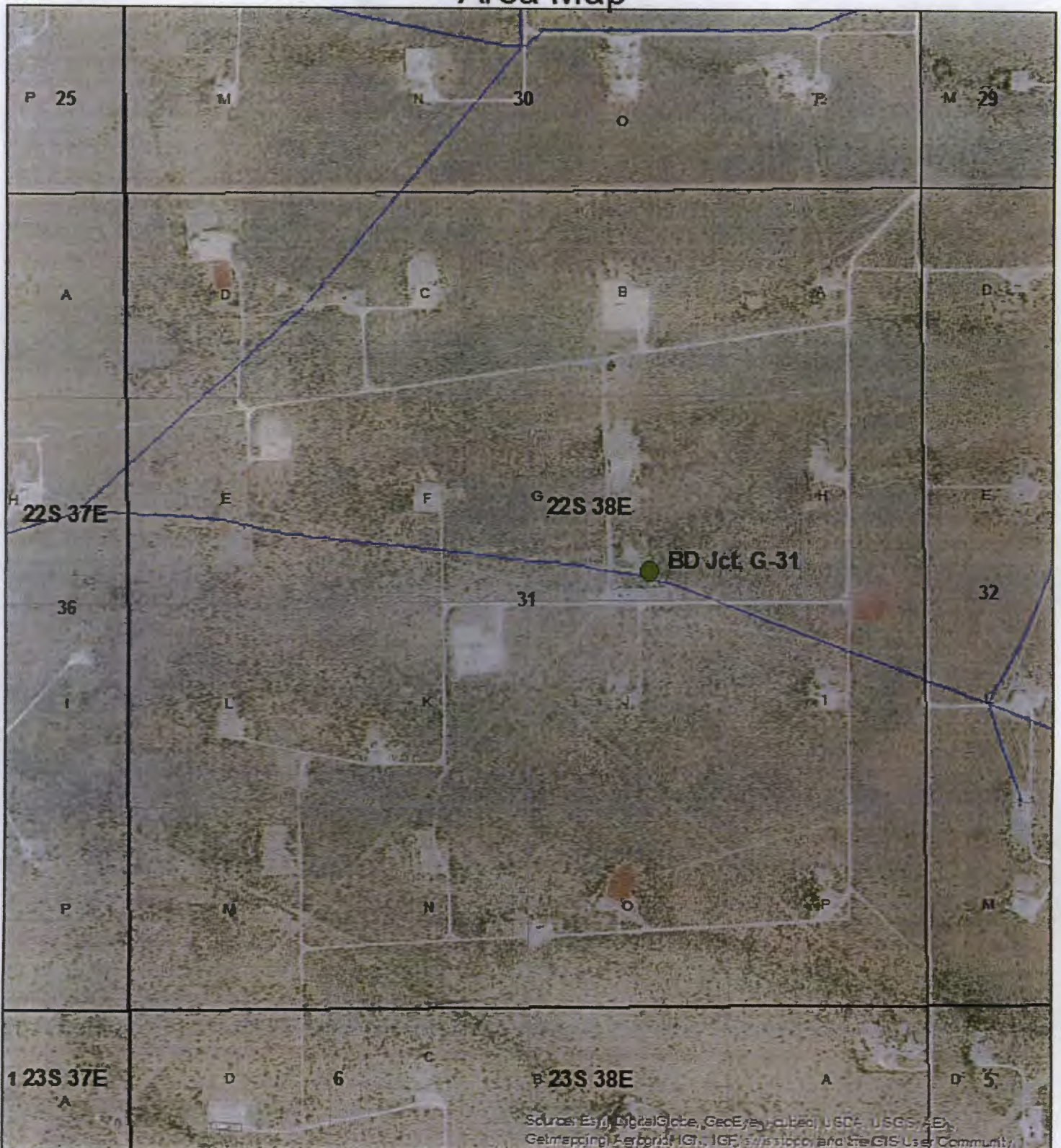
UL/G Section 31
T-22-S R-38-E



0 3,000 6,000
Feet

Drawing date: January 15, 2014
Drafted by: C. Ursanic

Area Map

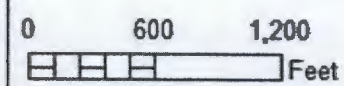


Source: Esri, DigitalGlobe, GeoEye, Aero, USGS, USGS, GEBCO, Getmapping, Aerion, IGN, IGFS, and the GIS User Community



BD Jct. G-31

UL/G Section 31
T-22-S R-38-E



Drawing date: January 15, 2014
Drafted by: C. Ursanic

BD Jct. G-31

Unit G, Section 31, T22S, R38E



Site prior, facing south

9/12/13



Digging vertical, facing south

11/20/13



Importing top soil, facing north

11/26/13



Installing 6" sand pad at base of excavation, facing southwest

11/26/13



Exporting soil, facing east

11/26/13



Installed 30'x30', 20-mil poly liner at 11.5', facing southwest

11/26/13



Installed 6" pad above liner, facing northeast
11/20/13



Benching excavation, facing west
12/2/13



Backfilling excavation, facing north
12/4/13



Installed 35'x40', 20-mil poly liner at 4.5 ft bgs,
facing southwest
12/9/13



Seeding site, facing northeast
1/7/14



Site completed, facing southwest
1/7/14



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

November 25, 2013

KYLE NORMAN

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: BD JUNCTION G-31

Enclosed are the results of analyses for samples received by the laboratory on 11/22/13 9:10.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. 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 accredited through the State of Colorado Department of Public Health and Environment for:

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Snyder", written in a cursive style.

Mike Snyder

Organic Supervisor

Analytical Results For:

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

 Received: 11/22/2013
 Reported: 11/25/2013
 Project Name: BD JUNCTION G-31
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 11/21/2013
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: BOTTOM 5 PT. COMP (H302871-01)

Chloride, SM4500Cl-B		mg/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	3080	16.0	11/22/2013	ND	416	104	400	0.00	
TPH 8015M		mg/kg	Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	11/22/2013	ND	196	98.0	200	3.75	
DRO >C10-C28	42.3	10.0	11/22/2013	ND	192	95.8	200	6.10	
Surrogate: 1-Chlorooctane	95.8 %	65.2-140							
Surrogate: 1-Chlorooctadecane	101 %	63.6-154							

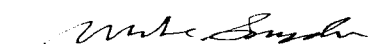
Sample ID: 4 WALL COMP (H302871-02)

Chloride, SM4500Cl-B		mg/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	3720	16.0	11/22/2013	ND	416	104	400	0.00	
TPH 8015M		mg/kg	Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<50.0	50.0	11/22/2013	ND	196	98.0	200	3.75	
DRO >C10-C28	112	50.0	11/22/2013	ND	192	95.8	200	6.10	
Surrogate: 1-Chlorooctane	114 %	65.2-140							
Surrogate: 1-Chlorooctadecane	124 %	63.6-154							

Cardinal Laboratories

*=Accredited Analyte

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 Mike Snyder, Organic Supervisor


Notes and Definitions

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

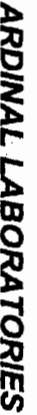
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*=Accredited Analyte

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Mike Snyder, Organic Supervisor



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					P.O. #:	ANALYSIS REQUEST															
Project Manager: Kyle Norman					Company:																
Address: 112 W. Taylor					City:																
City: Hobbs					State: NM Zip: 88240																
Phone #:					Fax #:																
Project #:					Project Owner:																
Project Name:					State: Zip:																
Project Location: BD JCT G-31					Phone #:																
Sampler Name: Dylan Yarbrough					Fax #:																
FOR LAB USE ONLY					MATRIX	PRESERV.	SAMPLING														
Lab I.D. H302871	Sample I.D. Bottom Set composite 2 Well Composite	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :	DATE	TIME	Chlorides	TPH 8015 M	BTEX	Texas TPH	Complete Cations/Anions	TDS	

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Relinquished By:	Date: 11/21/13	Received By:	REMARKS:
<i>[Signature]</i>	Time: 9:10	<i>[Signature]</i>	email results Rush!! knorman@rice-ecs.com; hconder@rice-ecs.com; lweinheimer@rice-ecs.com; klonas@riceswd.com; Lpena@riceswd.com; dyarbrough@rice-ecs.com
Reinforced By:	Date:	Received By:	
<i>[Signature]</i>		<i>[Signature]</i>	

Delivered By: (Circle One)	Sample Condition	CHECKED BY:
Sampler - UPS - Bus - Other:	<input type="checkbox"/> Cool <input checked="" type="checkbox"/> Intact <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> No	<i>[Signature]</i>

Page 4 of 4

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: PGM 7300	SERIAL NO: 590-000508
MODEL		MODEL: PGM 7300	SERIAL NO: 590-000504
NO.	X	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
BD	Jct. G-31	G	31	22S	38E

SAMPLE ID	PID	SAMPLE ID	PID
4-WALL COMPOSITE	0.8		
BOTTOM COMPOSITE	0.9		

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

SIGNATURE: _____ Not Available _____ DATE: 11/21/2013



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

December 04, 2013

KYLE NORMAN

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: BD JUNCTION G-31

Enclosed are the results of analyses for samples received by the laboratory on 12/04/13 9:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. 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/ga/lab_accred_certif.html.

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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

Lab Director/Quality Manager

Analytical Results For:

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

Received: 12/04/2013
Reported: 12/04/2013
Project Name: BD JUNCTION G-31
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 12/03/2013
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

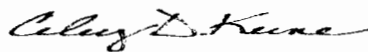
Sample ID: BLENDED BACKFILL (H302930-01)

Chloride, SM4500Cl-B		mg/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	3280	16.0	12/04/2013	ND	416	104	400	0.00	
TPH 8015M		mg/kg	Analyzed By: ck						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	12/04/2013	ND	193	96.6	200	3.60	
DRO >C10-C28	45.5	10.0	12/04/2013	ND	190	95.0	200	6.49	
Surrogate: 1-Chlorooctane	85.3 %	65.2-140							
Surrogate: 1-Chlorooctadecane	89.9 %	63.6-154							

Cardinal Laboratories

* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

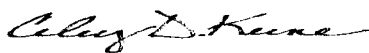
Notes and Definitions

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

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]

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: PGM 7300	SERIAL NO: 590-000508
MODEL		MODEL: PGM 7300	SERIAL NO: 590-000504
NO.	X	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
BD	Jct. G-31	G	31	22S	38E

SAMPLE ID	PID	SAMPLE ID	PID
BLENDED BACKFILL	0		

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

SIGNATURE: _____ Not Available _____ DATE: 12/3/2013

CHLORIDE CONCENTRATION CURVE

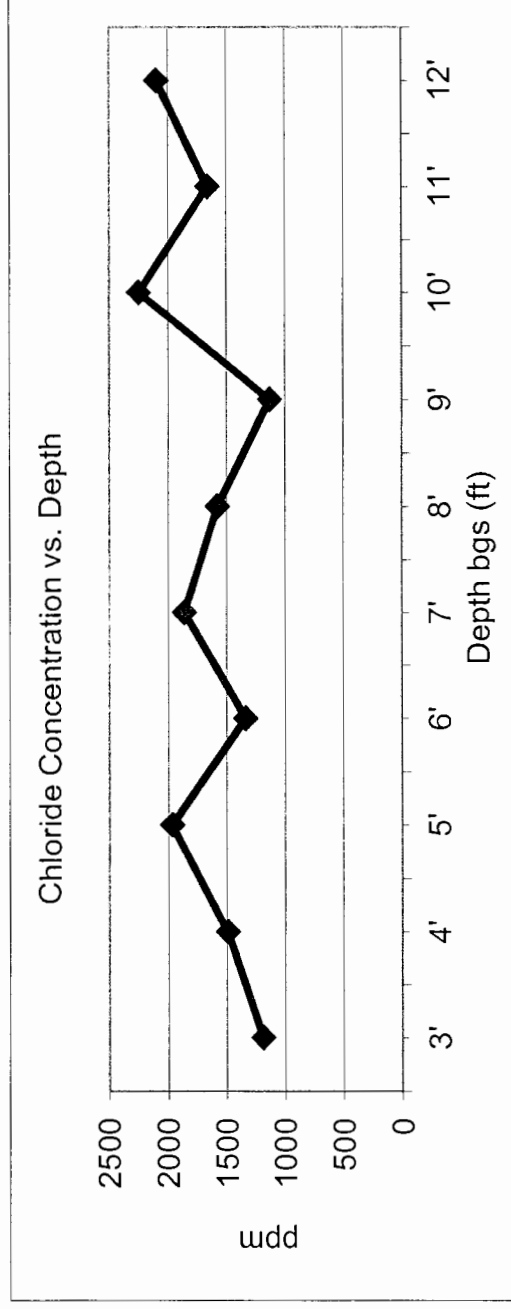
RICE Operating Company

BD Jct. G-31

Unit 'G', Sec. 31, T22S, R38E

Backhoe samples at the junction (source)

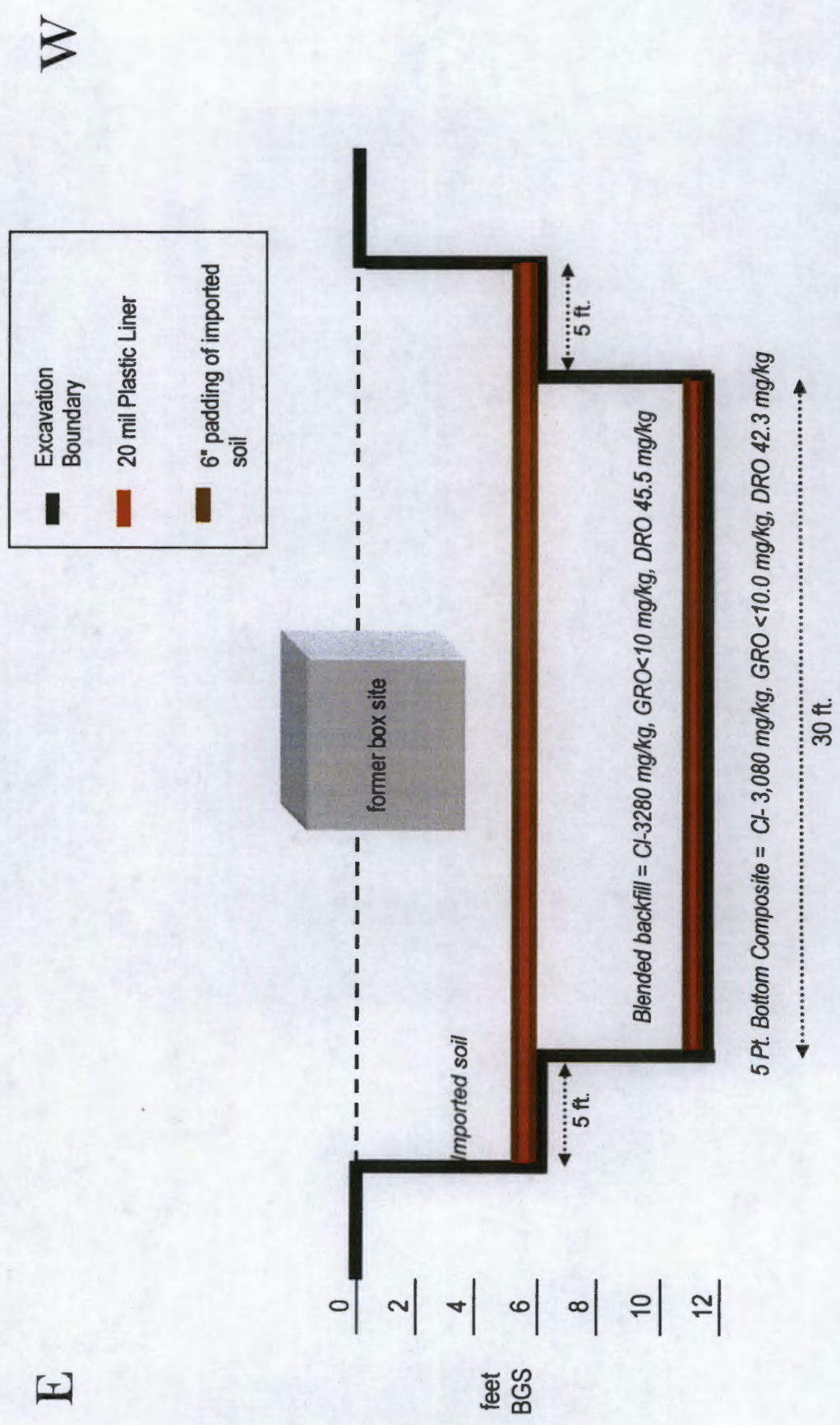
Depth bgs (ft)	[Cl ⁻] ppm
3'	1191
4'	1493
5'	1966
6'	1340
7'	1863
8'	1580
9'	1131
10'	2250
11'	1663
12'	2099



Groundwater = 40 ft

BD Jct. G-31
Unit 'G', Sec. 31, T22S, R38E

Excavation Cross-Section





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

VEGETATION FORM

1. General Information

Site name: BD JCT G-31						
U/L G	Section 31	Township 22S	Range 38E	County Lea	Latitude 32 20' 56.242" N	Longitude 103 5' 48.478" W
Contact Name: Zach Conder						
Email: zconder@rice-ecs.com						
Site size: 400 square feet						

2. Soils

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

Salvaged from site	Bioremediated	<input checked="" type="checkbox"/> X	Imported	Blended	Depth (in)	
Texture:	Describe soil & subsoil: Caliche					
Soil prep methods:	Rip	Depth (in)	Disc	Depth (in)	Rollerpack	
Date completed:	12/14/2013					

3. Bioremediation

Fertilizer	Hay	Other
Type:	Describe: 10 bags of potting soil, 10 bags of bioNhance	
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	<input checked="" type="checkbox"/> X	Prescribed Mix	Seed Mix Name:	5 lbs. of Blue Grama, 5 lbs. of Side Oats, & 5 lbs. of Winter Wheat	Date:	1/7/2014
Broadcast		Method:	Portable Seeder			
Soil conditions during seed:	Dry	Damp	Wet			
Observations:	Raked and tilled					

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: Jose Flores	Title: Environmental Tech	Date: 1/7/2014
Signature: <i>José Flores</i>		

RICE *Operating Company*

122 West Taylor • Hobbs, New Mexico 88240

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

April 1, 2014

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

RE: JUNCTION BOX UPGRADE REPORT for 2013
BD SWD SYSTEM
Lea County, New Mexico

Mr. Lowe:

Rice Operating Company (ROC) takes this opportunity to submit the Junction Box Upgrade results for the year 2013. Enclosed is a list of the completed junction boxes and their respective closure/disclosure dates. These boxes are located in the Blinbry-Drinkard (BD) Salt Water Disposal (SWD) System located in the vicinity of Eunice, New Mexico.

ROC completed 12 junction boxes in 2013. Junction box upgrades in 2014 will be conducted in conjunction with scheduled pipeline replacements.

Enclosed are the 2008 results (17 sites evaluated with 22 sampling locations) from the PID/BTEX study described in the NMOCD-approved Revised Junction Box Upgrade Work Plan (July 16, 2003). A third-party analysis, conducted by Peter Galusky, Jr. Ph.D. of Texerra, concluded from the data collected thus far that field-composited values tend to produce slightly higher BTEX numbers above the point at which BTEX concentrations become significant. This is likely due to the fact that BTEX is volatile and quickly biodegradable. This analysis was submitted to NMOCD on March 12, 2009. An appropriate number of sample sites could not be obtained to conduct a 2013 BTEX comparison analysis. Peter Galusky, Jr. Ph.D. of Texerra also compared ROC's 2013 chloride field tests to chloride laboratory analyses; the analysis is also enclosed. The study of this data continues to validate the accuracy of the chloride field tests employed by ROC.

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

Replacement/closure projects of this magnitude require System Party AFE approval and work begins as funds are received.

Thank you for your consideration of this Junction Box Upgrade Report for 2013.

RICE OPERATING COMPANY

A handwritten signature in black ink, appearing to read 'H. Conder', with a long, sweeping horizontal line extending to the right.

Hack Conder
Environmental Manager

enclosures as stated

cc: SC, file, Mr. Geoffrey Leking
NMOCD, District I Office
1625 N. French Drive
Hobbs, NM 88240

Rice Operating Company
BD SWD System Junction Box Upgrade Project
2013 Completed Boxes

		Legal Description							
	Jct Box Name	Unit	Sec	T	R	Completion Date	OCD Assessment Score	Report Status	Case Number
1	G-29 EOL	G	29	22S	38E	1/7/2014	0	Disclosure	
2	Jct. G-31	G	31	22S	38E	1/7/2014	20	Disclosure	
3	JCT. M-29	M	29	22S	38E	11/1/2013	0	Disclosure	
4	JCT. N-29	N	29	22S	38E	9/11/2013	0	Disclosure	
5	JCT. N-30	N	30	22S	38E	8/19/2013	10	Disclosure	
6	O-29-1 VENT	O	29	22S	38E	7/26/2013	0	Disclosure	
7	O-30 VENT	O	30	22S	38E	11/6/2013	10	Disclosure	
8	Jct. P-14	P	14	22S	37E	8/21/2012	10	Disclosure	
9	J-29 Vent	J	29	22S	38E	n/a	0	Closure	
10	J-30 EOL	J	30	22S	38E	10/22/2013	10	Closure	
11	JCT. J-29	J	29	22S	38E	n/a	0	Closure	
12	M-28 EOL	M	28	22S	38E	11/5/2013	0	Closure	

L. Peter Galusky, Jr. Ph.D., P.G.

Texerra

505 N Big Spring, Suite 404 Midland, Texas 79701

Tel: 432-634-9257 E-mail: lpg@texerra.com

March 10th, 2009

Mr. Brad Jones
New Mexico Energy, Minerals, & Natural Resources
Oil Conservation Division, Environmental Bureau
1220 S. St. Francis Drive
Santa Fe, New Mexico 87504

Re: Comparison of Field versus Lab Compositing of BTEX soil samples
Rice Operating Company, Junction Box Upgrade Work Plan

Sent via Certified Mail w/ Return Receipt No. 7006 0100 0001 2438 3944

Dear Mr. Jones:

On behalf of Rice Operating Company (ROC) I am submitting the attached comparison and analysis of field versus laboratory soil compositing for soil BTEX samples. This is to address the question of whether it is better to mix multiple samples in the field or to do so in the laboratory in order to produce a composite, representative sample for analysis. This work was undertaken in support of ROC's Junction Box Upgrade Work Plan to ensure the quality of their field analysis program.

In brief, this work indicates that field compositing of soil samples generally gives rise to *slightly* higher BTEX values than does laboratory compositing of multiple samples. This is presumably due to the likelihood that field compositing and packaging of soil samples better preserves sample integrity. It would therefore appear that field compositing would represent the better method of procuring soil samples for subsequent analysis of BTEX.

Please call me if you have any questions or wish to discuss any of the details of this study.

ROC is the service provider (agent) for various Salt Water Disposal Systems (SWDs) and has no ownership of any portion of pipeline, well or facility. The SWD Systems that ROC operates are owned by a consortium of oil producers, System Partners, who provide all operating capital on a percentage ownership/usage basis.

Sincerely,



L. Peter Galusky, Jr. Ph.D.
Principal

Copy: Rice Operating Company,
Edward Hansen (NMOCD) sent certified mail w/ return receipt
No. 7006 0100 0001 2438 3937
Attachment: As noted, above.

Rice Operating Company

Comparison of Field Compositing versus Laboratory Compositing of Soil BTEX Samples¹

The careful mixing of multiple soil samples is critical in order to produce a representative, composite sample from a respective study area (such as an excavation face or bottom). Field technicians typically take four or five “grab” samples from excavation walls and/or bottom and send each of these to a laboratory for analysis of the composite, or mixed, sample. It would be far simpler, however, to composite such samples in the field. This study was undertaken to determine if field compositing produced results substantially different than laboratory compositing for the analysis of BTEX. Data were provided by Rice Operating Company encompassing 22 sampling locations over the period of 2004 through 2008.

A comparison of lab-composited soil samples versus field-composited soil samples revealed a close correspondence for total BTEX between the two methods (Figure 1).

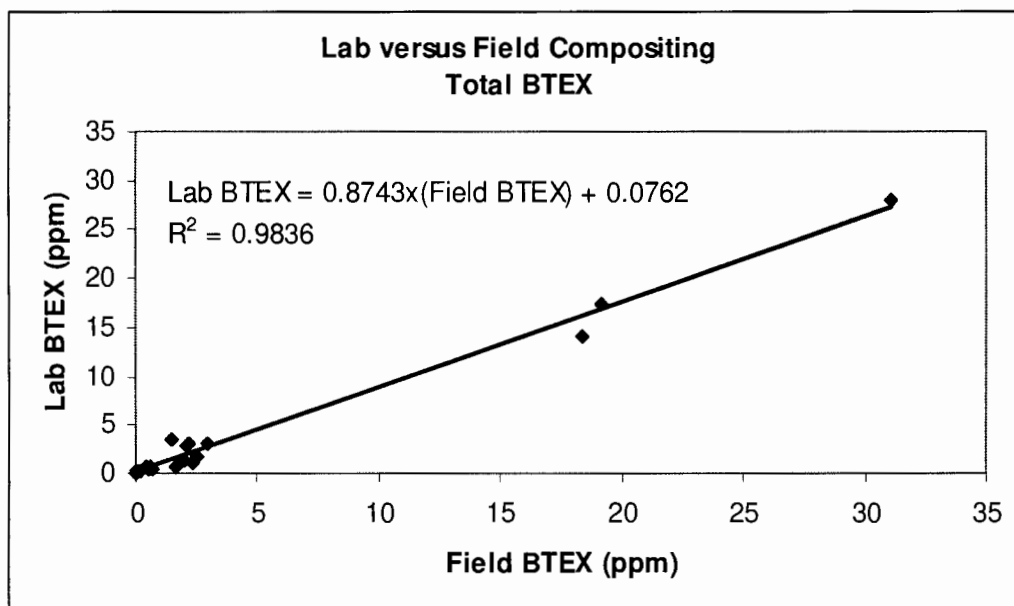


Figure 1 - Laboratory versus field-composited soil samples analyzed for BTEX.

The high R^2 value (0.9836) of the best-fit statistical regression line indicates a high degree of reliability in using the field-compositing method over the range of values observed. Below a “field-composited BTEX” value of 0.61 ppm the “lab-composited BTEX” values are slightly lower. However, above a field-composited BTEX value of 0.61 the lab-composited values run slightly lower. In other words, the field-composited values tended to produce slightly higher BTEX numbers above the point at which BTEX concentrations become significant.

There is a reason for this. BTEX is volatile and quickly biodegradable. The compositing and “packaging” of soil samples in the field minimize the handling and aeration that occur in the laboratory. Thus, field-composited soil samples lose less BTEX to evaporation and/or biodegradation prior to laboratory analysis. In other words, the field compositing and packaging of soil samples better preserves sample integrity, and for this reason would appear to represent the better method of procuring soil samples for subsequent analysis of BTEX.

¹ Prepared 03-12-09 by L. Peter Galusky, Jr. of Texerra.

L. Peter Galusky, Jr. Ph.D., P.G.

Texerra LLC

**20055 Laredo Lane Monument, CO 80132
Tel: 719-339-6791 E-mail: lpg@texerra.com**

March 25th, 2014

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

Re: Comparison of 2013 Laboratory versus Field Measured Soil Chloride Values
Rice Operating Company, Junction Box Upgrade Work Plan

Mr. Lowe:

The attached comparison and analysis of 2013 laboratory versus field measured soil chloride values is submitted in support of Rice Operating Company's (ROC's) Junction Box Upgrade Work Plan to ensure the quality of their field analysis program.

In brief, this work indicates that Rice's 2013 field chloride measurement efforts provided a reasonable qualitative approximation of the laboratory-measured (and presumed true) values.

ROC is the service provider (agent) for various Salt Water Disposal Systems (SWDs) and has no ownership of any portion of pipeline, well or facility. The SWD Systems that ROC operates are owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis.

Please call me if you have any questions or wish to discuss this study.

Sincerely,



L. Peter Galusky, Jr. Ph.D.
Principal

Copy: Glenn VonGonten, NMOCD; Rice Operating Company
Attachment: As noted, above.

Rice Operating Company
Comparison of Laboratory to Field Measured Soil Chloride Concentrations
Based upon 2013 Field Data

A representative sample of 29 pairs of laboratory versus field measured soil chloride values was compared to determine how well field measurements matched laboratory measurements. It is assumed that laboratory measurements better represent the “true” values due to the controlled environment that a laboratory provides. A simple plot of the laboratory versus field measured soil chloride values is given below (Figure 1).

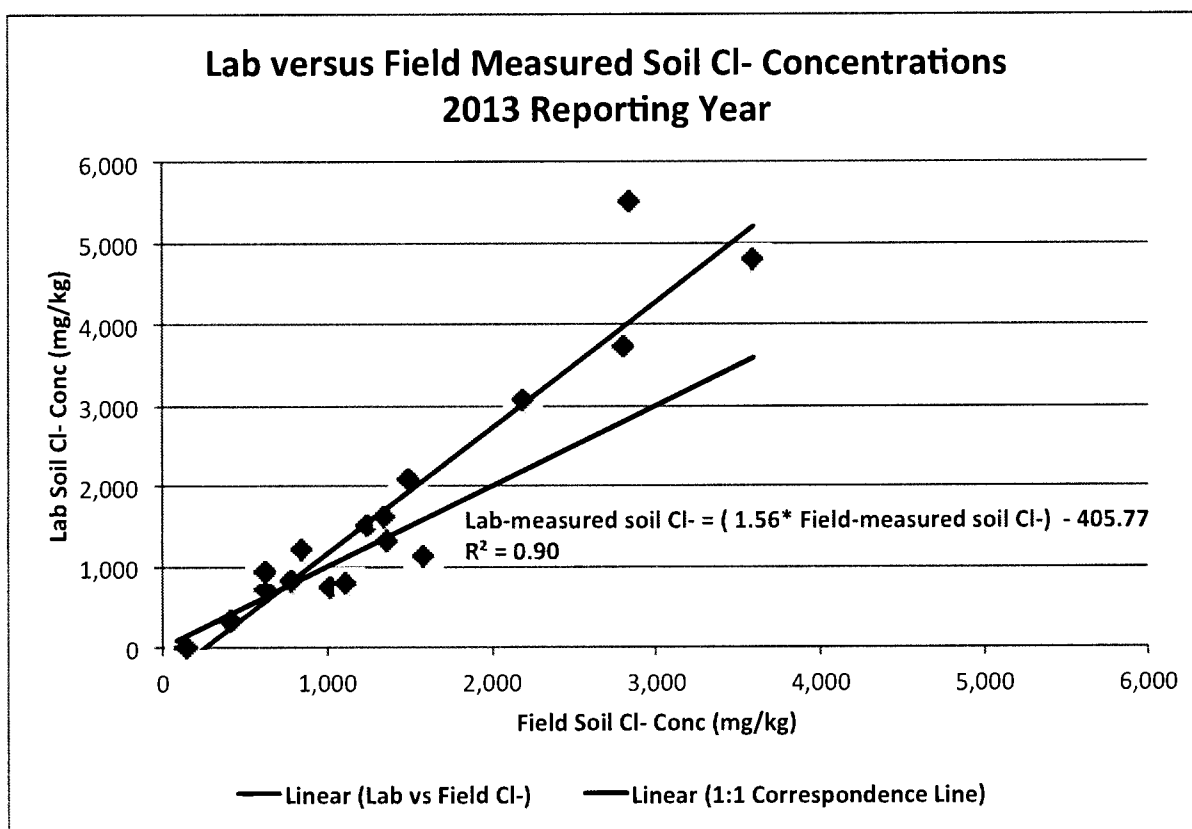


Figure 1 – Laboratory versus field measured soil chloride measurements (n = 29 paired sets).

A straight line fit to the data confirms a general linear trend over a wide range of soil chloride concentrations, and the R^2 value (0.90) indicates that field measurements provide a reliable approximation of laboratory-measured values. Based on the best-fit line of lab vs field measured values, field measured values overestimate lab measure values below a field measured value of 723 mg/kg and above this underestimate the lab-measured values. This is indicated in the graph where the (blue) best-fit line of lab vs field measured chlorides crosses the (black) line which would indicate a 1:1 correspondence.