

1R-425-67

**REPORTS**

**DATE:**

**7-7-11**

---

RECEIVED OCD

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

2011 JUL 11 AM 11:58

Texerra

627 Forest View Way Monument, Colorado 80132  
Tel: 917-339-6791 E-mail: lpg@texerra.com

July 7<sup>th</sup>, 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

Re: Project Update  
Rice Operating Company – Vacuum SWD System  
Vacuum F-34 Vent Boot UL F, Sect 34, Township 17S, Range 35E  
NMOCD Case Number 1R425-67

Sent via E-mail and U.S. Mail Certified Return Receipt No. 7011 0110 0001 5863 4868

Mr. Hansen:

Rice Operating Company (ROC) has completed the installation of a double synthetic subsurface soil liner and surface restoration as the vadose zone protective remedy for the Vacuum F-34 Vent Boot project (location map given in Figure 1), as summarized in the previously submitted (November 26<sup>th</sup>, 2010) Notification of Groundwater Impact and Addendum submitted December 22, 2010. This work, which was completed in April and May of this year, is summarized, below:

- Soils were excavated to 4.5 ft bgs over an area of approximately 75 by 45 ft, encompassing the surface footprint of the affected area. Large rocks were sifted and removed to Sundance Disposal.
- Additional soil material was excavated to a depth of 16 ft bgs from two separate excavations, each encompassing an area of approximately 10 by 10 ft and surrounding the soil borings, which previously indicated more significant subsurface chloride contamination (SB-2 and SB-4).
- Six inches of clean blow sand (PID = 3.1, lab chlorides < 16 mg/kg) was added as padding to the bottoms of these two, deeper excavations and a 20 mil reinforced liner was installed into each one. The liner was then padded with six inches of clean blow sand and blended backfill (PID = 38.3, lab chlorides 1,650 mg/kg) was backfilled into each 10 by 10 ft excavation to the base of the larger excavation (at 4.5 ft bgs). Six inches of clean blow sand was added as padding over the 75 by 45 ft area.
- A 20 mil reinforced liner was installed over the 75 by 45 ft excavation and six inches of clean blow sand was added as padding above it. Clean, pond-bottom soil (PID = 1.8, lab chlorides = 16 mg/kg) was then backfilled to near the surface and clean blow sand was added and contoured to the original ground surface.
- Silt fencing was installed around the restored area. 850 lbs of bioNhance and 4 bales of peanut hay were added as soil amendment. Following this, the site was seeded with 10 lbs of warm season mix, 7.5 lbs of blue gramma grass and 20 lbs of race horse oats. The soil amendments and seed were incorporated into the soil using a tractor.

A photographic chronology of this work is given in Figure 2. A total of 520 cubic yards of rock and contaminated soil material was hauled to and disposed at Sundance Disposal. A total of 608 cubic yards of blow sand and pond bottom soil was imported and used as liner padding and backfill. Field PID

## VAC F-34 Vent Boot

analysis of hydrocarbons and laboratory analyses of chlorides and the revegetation form are given in the Appendix.

We submit that the installation of the double-liner system and the restoration of the soil surface serve as a remedy to protect groundwater from potential future leaching of residual soil chlorides from the unsaturated zone beneath this location. We will continue to monitor groundwater through the end of this calendar year, subsequently prepare and submit an analysis of historical groundwater impacts and determine if a remedy is warranted for the saturated zone.

ROC is the service provider (agent) for the Vacuum 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.

Please call either myself or Hack Conder of Rice Operating Company if you have any questions or wish to discuss this matter. Thank you for your consideration.

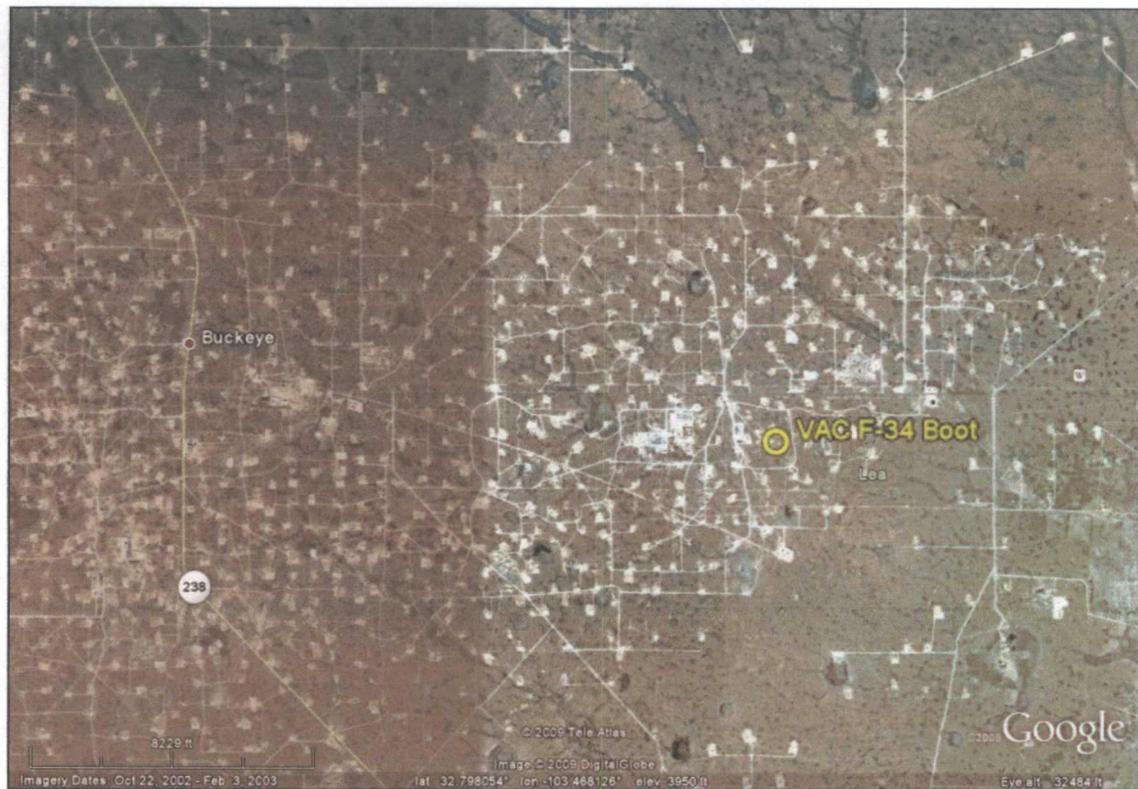
Sincerely,

A handwritten signature in black ink, appearing to read 'L. Peter Galusky, Jr.', written in a cursive style.

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

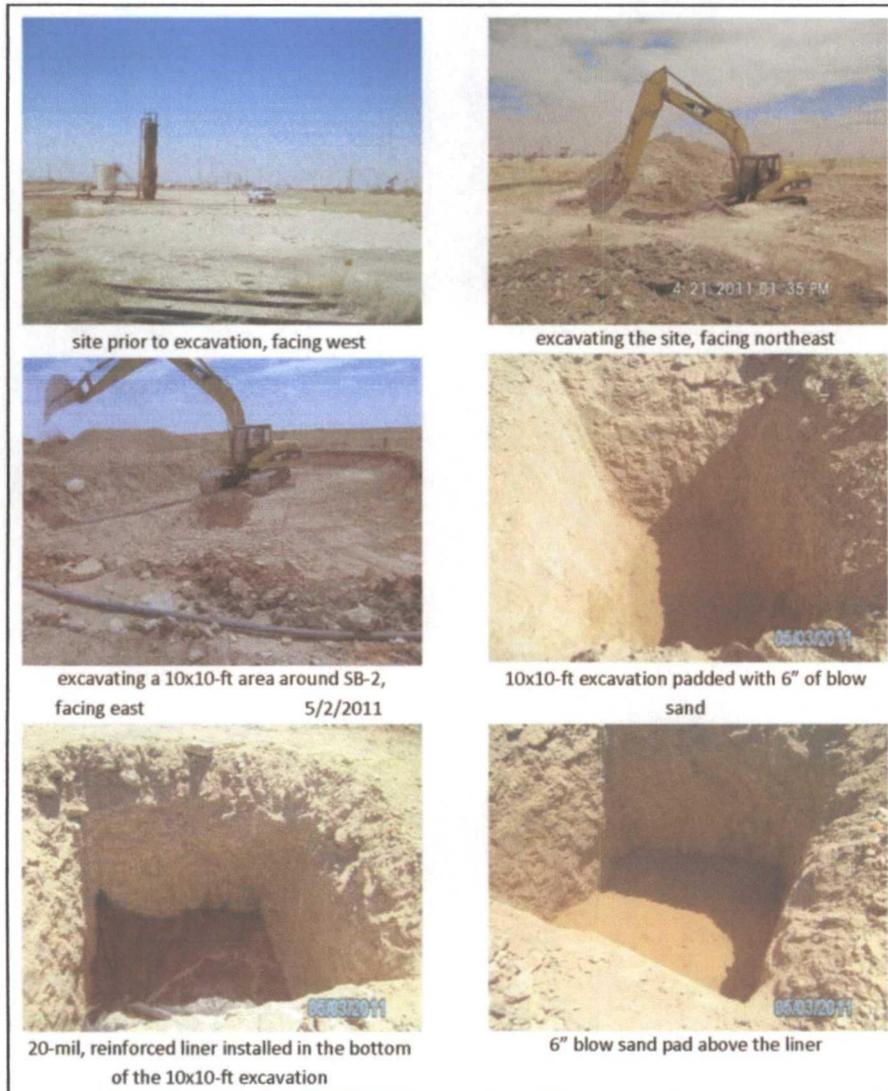
Copy: Rice Operating Company

## VAC F-34 Vent Boot



**Figure 1** – VAC F-34 Vent Boot location. The general topographic gradient and presumed water table gradient is toward the southeast.

VAC F-34 Vent Boot



**Figure 2a** – Photo-chronology of double-liner installation and soil restoration.

VAC F-34 Vent Boot



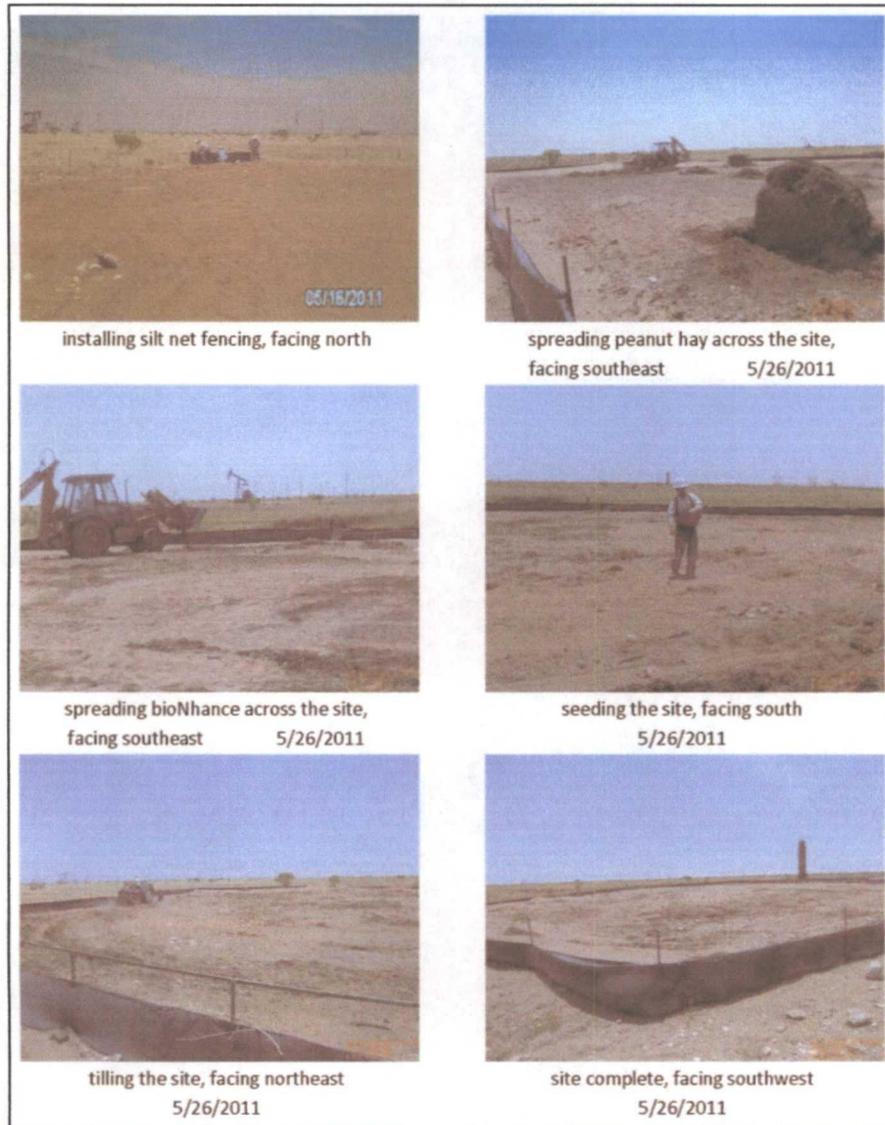
Figure 2b – Photo-chronology of double-liner installation and soil restoration.

VAC F-34 Vent Boot



**Figure 2c** – Photo-chronology of double-liner installation and soil restoration.

VAC F-34 Vent Boot



**Figure 2d** – Photo-chronology of double-liner installation and soil restoration.

## VAC F-34 Vent Boot

### APPENDIX

#### Contents

- Appendix A-1: Blended backfill field PID reading.
- Appendix A-2: Blended backfill laboratory chloride analysis (5 pages).
- Appendix A-3: Imported blow sand field PID reading.
- Appendix A-4: Imported blow sand field laboratory chloride analysis (4 pages).
- Appendix A-5: Imported pond bottom soil field PID reading.
- Appendix A-6: Imported pond bottom soil laboratory chloride analysis (4 pages).
- Appendix A-7: Revegetation form.



VAC F-34 Vent Boot

Appendix A-2: Blended backfill laboratory chloride analysis (page 1 of 5).

 **CARDINAL**  
Laboratories

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

May 02, 2011

Bruce Baker  
Rice Operating Company  
112 W. Taylor  
Hobbs, NM 88240

RE: VACUUM F-34 BOOT

Enclosed are the results of analyses for samples received by the laboratory on 04/27/11 8:05.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method SW-846 8260	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method TX 1005	Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

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 (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

Page 1 of 5

VAC F-34 Vent Boot

Appendix A-2: Blended backfill laboratory chloride analysis (page 2 of 5).



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

**Analytical Results For:**

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

Received:	04/27/2011	Sampling Date:	04/26/2011
Reported:	05/02/2011	Sampling Type:	Soil
Project Name:	VACUUM F-34 BOOT	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: BLENDED BACKFILL (H100866-01)**

Chloride, SM4500C-B	mg/kg	Analyzed By: HM							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1650	16.0	04/29/2011	ND	448	112	400	3.64	

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Appendix A-2: Blended backfill laboratory chloride analysis (page 3 of 5).



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**Notes and Definitions**

- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- \*\* Samples not received at proper temperature of 6°C or below.
- \*\*\* Insufficient time to reach temperature.
- Chloride by SM4500C-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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A handwritten signature in cursive script, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager







VAC F-34 Vent Boot

Appendix A-4: Imported blow sand field laboratory chloride analysis (page 1 of 4).

 **CARDINAL**  
Laboratories

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

May 10, 2011

Hack Conder  
Rice Operating Company  
112 W. Taylor  
Hobbs, NM 88240

RE: VACUUM F-34 BOOT

Enclosed are the results of analyses for samples received by the laboratory on 05/09/11 15:00.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method SW-846 8260	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method TX 1005	Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

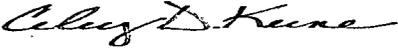
Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Halooacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (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

Page 1 of 4

VAC F-34 Vent Boot

Appendix A-4: Imported blow sand field laboratory chloride analysis (page 2 of 4).



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

**Analytical Results For:**

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

Received:	05/09/2011	Sampling Date:	05/09/2011
Reported:	05/10/2011	Sampling Type:	Soil
Project Name:	VACUUM F-34 BOOT	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: IMPORTED BLOWSAND (H100932-01)**

Chloride, SM4500Cl-B	mg/kg	Analyzed By: HM							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	05/10/2011	ND	448	112	400	0.00	

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Appendix A-4: Imported blow sand field laboratory chloride analysis (page 3 of 4).



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- RPD Relative Percent Difference
- \*\* Samples not received at proper temperature of 6°C or below.
- \*\*\* Insufficient time to reach temperature.
- Chloride by SM4500C-B does not require samples be received at or below 6°C  
Samples reported on an as received basis (wet) unless otherwise noted on report

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Celey D. Keene, Lab Director/Quality Manager



**CARDINAL LABORATORIES**

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Ahlboro, TX 78603  
 (800) 393-2328 FAX (800) 393-2476 (328) 673-7001 FAX (328) 673-7020

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

Company Name: <b>RICE</b> Project Manager: <b>HACKIE CONLERN</b>		P.O. #: _____ Company: _____	
Address: <b>132 W. Taylor</b> City: <b>Hobbs, NM</b> State: <b>NM</b> Zip: <b>88240</b>		Address: _____ City: _____ State: _____ Zip: _____	
Phone #: <b>505 393 2174</b> Fax #: _____ Project #: _____ Project Owner: _____		Phone #: _____ State: _____ Zip: _____	
Project Location: <b>VACUUM FEED BOAT</b> Sampler Name: <b>L. GRIECO</b>		Phone #: _____ Fax #: _____	
Lab I.D. <b>Sample I.D.</b>			
(G)RAB OR (C)OMP. <input checked="" type="checkbox"/>			
# CONTAINERS <b>1</b>			
MATRIX: <input checked="" type="checkbox"/> GROUNDWATER <input type="checkbox"/> WASTEWATER <input type="checkbox"/> SOIL <input type="checkbox"/> OIL <input type="checkbox"/> SLUDGE <input type="checkbox"/> OTHER: _____			
ACID/BASE: <input checked="" type="checkbox"/> ACE / COOL <input type="checkbox"/> OTHER: _____			
DATE <b>5/9/12</b> TIME <b>12:30</b>		ANALYSIS REQUEST: <b>CHLORIDE</b>	
RECEIVED BY: <b>[Signature]</b>			
COLLECTED BY: <b>[Signature]</b>			
DELIVERED BY: <b>[Signature]</b>			
REMARKS: <b>hondry@rice-sand-clim                  krowns@rice-sand-clim                  hbecke@rice-sand-clim                  luss@hainmaw@rice-sand-clim</b>			



VAC F-34 Vent Boot

Appendix A-6: Imported pond bottom soil laboratory chloride analysis (page 1 of 4).



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

May 10, 2011

Bruce Baker  
Rice Operating Company  
112 W. Taylor  
Hobbs, NM 88240

RE: VACUUM F-34 BOOT

Enclosed are the results of analyses for samples received by the laboratory on 05/06/11 16:25.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method SW-846 8260	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method TX 1005	Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

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 (V2, V3)

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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

VAC F-34 Vent Boot

Appendix A-6: Imported pond bottom soil laboratory chloride analysis (page 2 of 4).



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

**Analytical Results For:**

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

Received:	05/06/2011	Sampling Date:	05/06/2011
Reported:	05/10/2011	Sampling Type:	Soil
Project Name:	VACUUM F-34 BOOT	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: IMPORTED SOIL POND BTM (H100924-01)**

Chloride, SM4500C-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	16.0	16.0	05/09/2011	ND	448	112	400	0.00		

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Celey D. Keene, Lab Director/Quality Manager

Appendix A-6: Imported pond bottom soil laboratory chloride analysis (page 3 of 4).



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**Notes and Definitions**

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- \*\*\* Insufficient time to reach temperature.
- Chloride by SM4500C-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

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A handwritten signature in cursive script that reads "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager



VAC F-34 Vent Boot

<b>New Mexico State Land Office</b> <b>Field Operations Division</b> (505) 827-5723 P.O. Box 1148 Santa Fe, NM 87504 (575) 392-8736 2702-D N. Grimes Hobbs, NM 88240 (575) 885-1323 N. Canal, Suite B Carlsbad, NM 88220 (575) 623-4979 1001 S. Atkinson Roswell, NM 88210 (575) 763-0796 105 E. 6 <sup>th</sup> St. Clovis, NM 88101							
<b>REVEGETATION FORM</b>							
<b>1. General Information</b>							
Site name: Vacuum F-34 vent boot				Lease No.:			
U/L or Qtr/Qtr F	Section 34	Township 17S	Range 35E	County LEA	Latitude 32°47'41.352"N	Longitude (NAD83) 103°26'58.144W	
Company Name: RICE OPERATING				Contact Name: HACK CONDER			
Phone no.: (575) 393-9174		Email: hconder@riceswd.com					
Address: 122 W. TAYLOR HOBBS, NM 88240							
Spill / Release <input type="checkbox"/>		P&A Well <input type="checkbox"/>		Pit Closure <input type="checkbox"/>		Facility Closure <input checked="" type="checkbox"/>	Other <input type="checkbox"/>
OCD Spill No.		API No.		Type: JUNCTION BOX			
Site size:		acres		16965 square feet		Map detail of site attached <input type="checkbox"/>	
Additional information:							
<b>3. Soils</b> *Do not rip caliche subsoils; caliche rocks brought to the surface by ripping shall be removed.							
Salvaged from site <input type="checkbox"/>		Bioremediated <input type="checkbox"/>		Imported <input checked="" type="checkbox"/>		Blended <input type="checkbox"/>	
Texture: SANDY		Describe soil & subsoil: SAND OVER CALICHE					
Soil prep methods: Rip <input type="checkbox"/>		Depth(in):		Disc <input checked="" type="checkbox"/>		Depth (in): 8	
Date completed: 5/26/11		Photos attached <input checked="" type="checkbox"/>		Number of photos:			
<b>4. Seeding</b> *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"/>		Prescribed mix <input type="checkbox"/>		Seed mix name: 10 LBS WARM SEASON MIX 7.5 LBS BLUE GRAMA 20 LBS RACE HORSE OATS		Seeding date: 5 / 26 / 11	
Is seed mix divided into submixes based on seed size?				Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			
Drill Seeder <input type="checkbox"/>		Drill Type:		Broadcast <input checked="" type="checkbox"/>		Hydroseeding <input type="checkbox"/>	
Soil conditions during seeding: Dry <input checked="" type="checkbox"/>		Damp <input type="checkbox"/>		Wet <input type="checkbox"/>			
Photos attached <input type="checkbox"/>		Observations:					
Number of photos:							
<b>5. Additional Methods</b>							
Mulching <input checked="" type="checkbox"/>		Crimping <input type="checkbox"/>		Fertilizer <input type="checkbox"/>		Other <input checked="" type="checkbox"/>	
Mulch type: PEANUT HAY 4 BALES		Type:		Describe: 850 LBS BIO-ENHANCE			
Tons/acre:		Lbs/acre:					
Photos attached <input type="checkbox"/>		Observations:					
Number of photos:							
<b>5. Certification</b> I hereby certify that the information in this form and attachments is true and complete to the best of my knowledge and belief.							
Name: TONY GRIECO				Title: ENVIRONMENTAL TECH		Date: 6/1/11	
Signature: 							

Version 20080925

Appendix A-7: Revegetation form.