

1R - 427-366

# WORKPLANS

Date:

5-22-12

---

Rice Environmental Consulting & Safety

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

1R427-366

CERTIFIED MAIL  
RETURN RECEIPT NO. 7007 2560 0000 4569 9644

May 22<sup>nd</sup>, 2012

**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. G-14 (NMOCD Case #: not yet assigned):  
UL/G sec. 14 T20S R36E**

2012 MAY 24 P 11:03  
RECEIVED COO

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 5 miles southwest of Monument, New Mexico at UL/G sec. 14 T20S R36E as shown on the Site Location Map (Figure 1). RECS conducted a groundwater study of NM OSE records and BLM well records which indicates that groundwater will likely be encountered at a depth of approximately 20 +/- feet.

In 2011, ROC initiated work on the former EME G-14 junction box. The site was delineated using a backhoe to form a 30 ft x 30 ft x 12 ft deep excavation and soil samples were screened at regular intervals for both hydrocarbons and chlorides. From the excavation, the four-wall composite and the bottom composite were taken to a commercial laboratory for analysis. Laboratory tests of the four-wall composite showed a chloride reading of non-detect, a gasoline range organics (GRO) reading of non-detect and a diesel range organics (DRO) reading of 980 mg/kg. The sample was also analyzed for BTEX given the elevated field PID reading. Benzene and ethyl benzene returned results of non-detect, toluene returned a result of 0.218 mg/kg and total xylenes returned a result of 1.45 mg/kg. The bottom composite showed a chloride laboratory reading of non-detect, a GRO reading of 118 mg/kg and a DRO reading of 2,450 mg/kg. This sample was also analyzed for BTEX with a benzene reading of non-detect, a toluene reading of 0.488 mg/kg, an ethyl benzene reading of 0.391 mg/kg and a total xylenes reading of 2.32 mg/kg. The excavated soil was properly disposed of at a NMOCD approved facility. Clean soil was imported to the site and used to backfill the excavation to 5 ft bgs where a 20-mil reinforced poly liner was installed and properly seated. The excavation was then backfilled with clean, imported soil to ground surface.

The area was contoured to the surrounding landscape and seeded. NMOCD was notified of potential groundwater impact on March 13<sup>th</sup>, 2012 and a junction box disclosure report (Appendix A) was submitted to NMOCD with all the 2011 junction box closures and disclosures.

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

## **Proposed Work Elements**

1. Conduct vertical and lateral delineation of residual soil hydrocarbons and chlorides from samples taken using a drill rig, hand auger, and/or backhoe (see Appendix B for Quality Procedures).
  - a. Vertical sampling will be conducted until the following criteria are met in the field.
    - i. Three samples in which the chloride concentration decreases and the third sample has a chloride concentration of  $\leq 250$  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  $\leq 250$  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 or hydrocarbons, then only a vadose zone remedy will be undertaken. However, if groundwater shows impact from residual chlorides or hydrocarbons, 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) 393-9174 or me if you have any questions or wish to discuss the site.

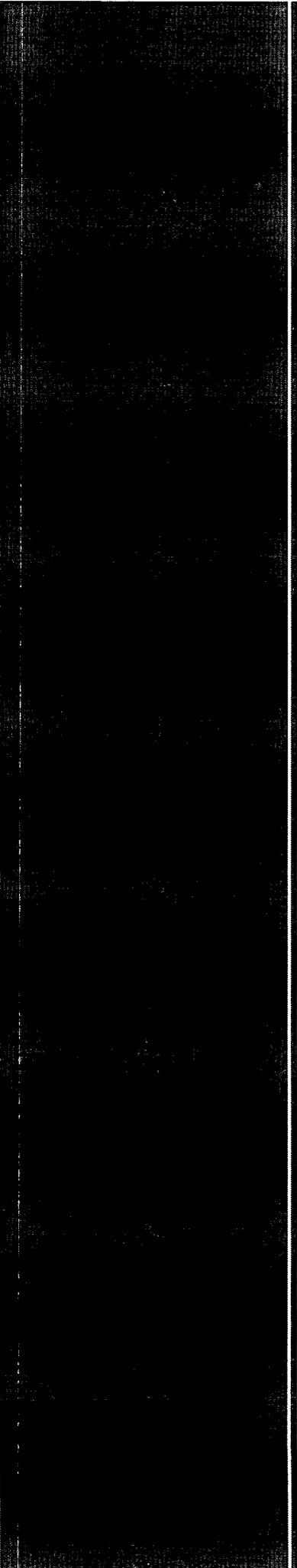
Sincerely,



Lara Weinheimer  
Project Scientist  
RECS  
(575) 441-0431

Attachments:

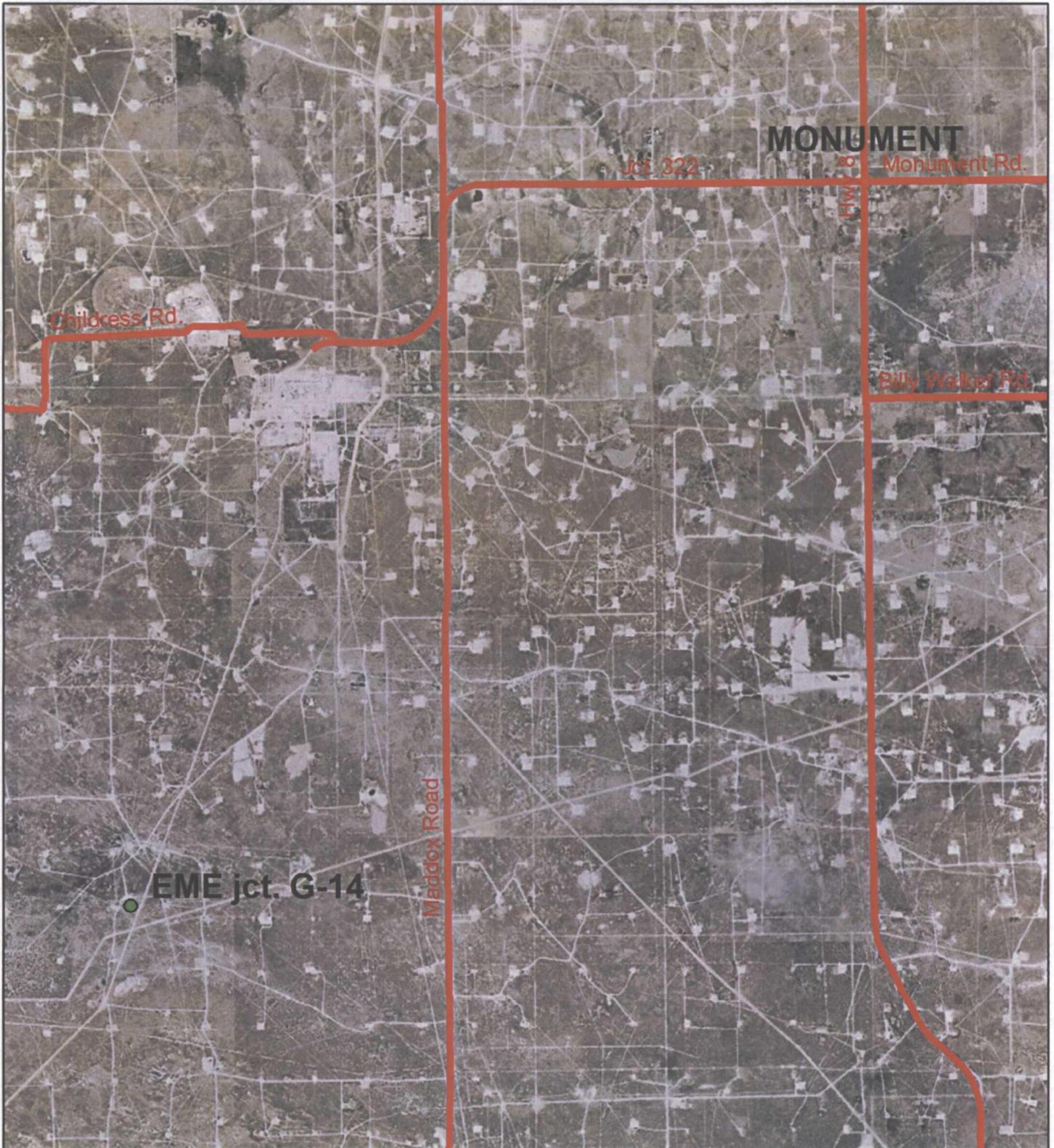
- Figure 1 – Site Location Map
- Appendix A – Junction Box Disclosure Report
- Appendix B – Quality Procedures



# Figures

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

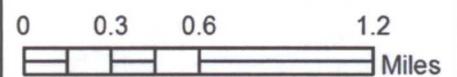
# Site Location Map



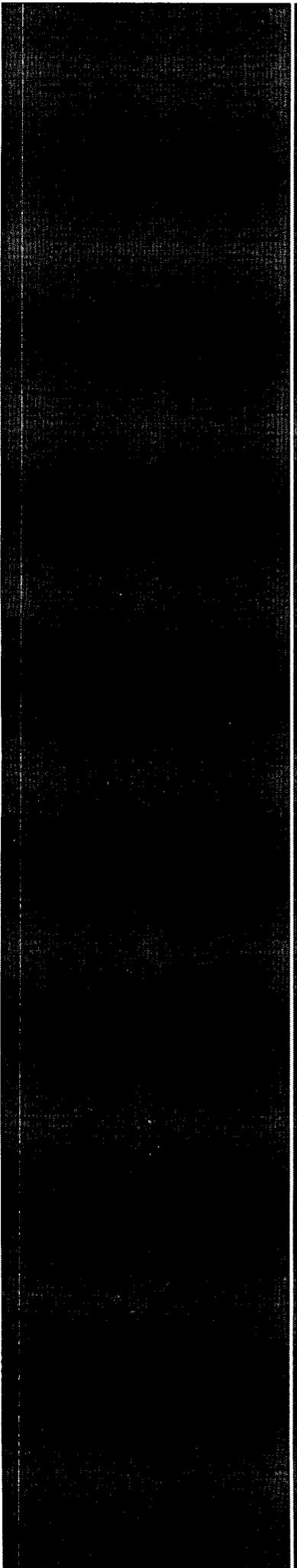
## *EME jct. G-14*

Legals: UL/G sec. 14  
T-20-S R-36-E  
LEA COUNTY, NM

### Figure 1



Drawing date: 5-3-12  
Drafted by: L. Weinheimer



# Appendix A

## Junction Box Disclosure Report

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

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

**BOX LOCATION**

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
							Length	Width	Depth
Eunice Monument Eumont (EME)	Jct. G-14	G	14	20S	36E	Lea	Eliminated		

LAND TYPE: BLM \_\_\_\_\_ STATE \_\_\_\_\_ FEE LANDOWNER Jimmie T. Cooper OTHER \_\_\_\_\_

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

Date Started 5/7/2011 Date Completed 8/1/2011 OCD Witness No

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

Soil Disposed 912 cubic yards Offsite Facility C & C Landfarm Location Monument, NM

**FINAL ANALYTICAL RESULTS:** Sample Date 5/21/2011, 7/20/2011 Sample Depth 12'

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

Sample Location	PID (field) ppm	Benzene mg/kg	Toluene mg/kg	Ethyl Benzene mg/kg	Total Xylenes mg/kg	GRO mg/kg	DRO mg/kg	Chloride mg/kg
4-WALL COMP.	104	<0.200	0.218	<0.200	1.45	<50.0	980	<16
BOTTOM COMP.	296.8	<0.200	0.488	0.391	2.32	118	2,450	<16
IMPORTED SOIL								<16

**General Description of Remedial Action:** This junction 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 creating a 30X30X12-ft. deep excavation. Chloride field test performed on each sample yielded concentrations similar to that of the background sample. Organic vapors were measured using a PID, which yielded elevated concentrations. Representative samples were collected from the bottom of the excavation and excavation walls. The samples were sent to a commercial laboratory for analysis of chloride, TPH, and BTEX. All excavated soil was properly disposed of at a NMOCD approved facility. Clean imported soil was used to backfill the excavation to a depth of 5 ft. BGS. On 7/26/2011, a 20-mil reinforced plastic liner was installed at 5 ft. BGS and the excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area. On

CHLORIDE FIELD TESTS		
LOCATION	DEPTH	mg/kg
4-wall comp.	N/A	121
bottom comp.	12'	124
background	6"	59
vertical delineation trench 15' east of source	2'	83
	4'	83
	6'	60
	8'	84
	10'	85
	12'	88

11/3/2011, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

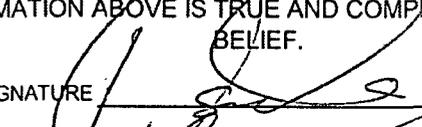
NMOCD was notified of potential groundwater impact on 3/13/2012.

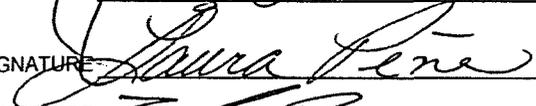
\*Stock tank located 900 ft southeast

**ADDITIONAL EVALUATION IS HIGH PRIORITY**

enclosures: photos, lab results, PID (field) screenings, cross-section, chloride curve, revegetation form

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

SITE SUPERVISOR Oscar Fraye SIGNATURE 

REPORT ASSEMBLED BY Laura Peña SIGNATURE 

COMPANY RICE OPERATING COMPANY

PROJECT LEADER Zach Conder SIGNATURE 

DATE 4-12-12

in a prioritized list of similar sites for further consideration.

# EME Jct. G-14

Unit G, Section 14, T20S, R36E



Excavating the site, facing west

5.7.11



Collecting sample, facing southeast

5.19.11



Exporting soil, facing northwest

7.6.11



Importing soil, facing north

7.25.11



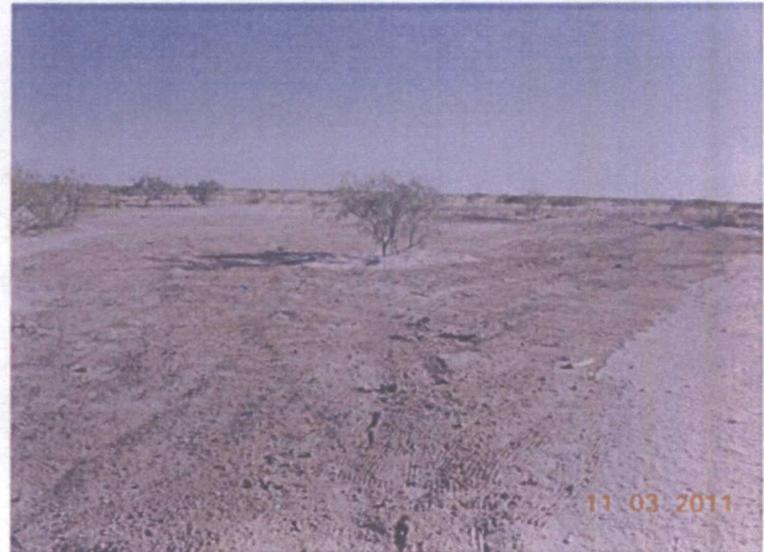
Installing 30 x 30 20-mil reinforced liner at 5-ft. BGS, facing south 7.26.11



Backfilling site with imported soil, facing north 7.26.11



Seeding site, facing west 11.3.11



Site complete, facing southeast 11.3.11



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

May 25, 2011

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

RE: EME JCT. G-14

Enclosed are the results of analyses for samples received by the laboratory on 05/23/11 15:15.

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

COPY

**Analytical Results For:**

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

Received:	05/23/2011	Sampling Date:	05/21/2011
Reported:	05/25/2011	Sampling Type:	Soil
Project Name:	EME JCT. G-14	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: 4 WALL COMPOSITE (H101045-01)**

BTEX 8021B		mg/kg		Analyzed By: CMS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.200	0.200	05/24/2011	ND	2.16	108	2.00	1.14		
Toluene*	0.218	0.200	05/24/2011	ND	2.06	103	2.00	1.29		
Ethylbenzene*	<0.200	0.200	05/24/2011	ND	2.11	106	2.00	0.484		
<b>Total Xylenes*</b>	<b>1.45</b>	<b>0.600</b>	<b>05/24/2011</b>	<b>ND</b>	<b>6.27</b>	<b>105</b>	<b>6.00</b>	<b>1.62</b>		

Surrogate: 4-Bromofluorobenzene (PIL) 96.0 % 70-130

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	05/24/2011	ND	448	112	400	0.00		

TPH 8015M		mg/kg		Analyzed By: AB						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<50.0	50.0	05/24/2011	ND	216	108	200	0.355		
<b>DRO &gt;C10-C28</b>	<b>980</b>	<b>50.0</b>	<b>05/24/2011</b>	<b>ND</b>	<b>188</b>	<b>93.8</b>	<b>200</b>	<b>1.10</b>		

Surrogate: 1-Chlorooctane 114 % 70-130

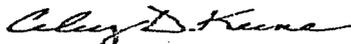
Surrogate: 1-Chlorooctadecane 101 % 70-130

COPY

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claims arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



Celey D. Keene, Lab Director/Quality Manager

**Analytical Results For:**

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

Received:	05/23/2011	Sampling Date:	05/21/2011
Reported:	05/25/2011	Sampling Type:	Soil
Project Name:	EME JCT. G-14	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: 5 PT. BTM COMP (H101045-02)**

BTEX 8021B		mg/kg		Analyzed By: CMS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.200	0.200	05/24/2011	ND	2.16	108	2.00	1.14		
Toluene*	0.488	0.200	05/24/2011	ND	2.06	103	2.00	1.29		
Ethylbenzene*	0.391	0.200	05/24/2011	ND	2.11	106	2.00	0.484		
Total Xylenes*	2.32	0.600	05/24/2011	ND	6.27	105	6.00	1.62		

Surrogate: 4-Bromofluorobenzene (PIL) 91.8 % 70-130

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	05/24/2011	ND	448	112	400	3.51		

TPH 8015M		mg/kg		Analyzed By: AB						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	118	50.0	05/24/2011	ND	216	108	200	0.355		
DRO >C10-C28	2450	50.0	05/24/2011	ND	180	93.0	200	1.10		

Surrogate: 1-Chlorooctane 125 % 70-130

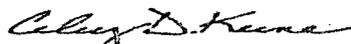
Surrogate: 1-Chlorooctadecane 112 % 70-130

COPY

Cardinal Laboratories

\* = Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



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

COPY

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

*Celey D. Keene*

Celey D. Keene, Lab Director/Quality Manager



# 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.	x
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
MODEL: PGM 7600	SERAIL NO: 110-013744

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO : 930360	EXPIRATION: 5/24/2013
METER READING ACCURACY: 100 ppm	

ACCURACY : +/- 2%

<b>COMPANY</b>
Rice Operating Company

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	JCT G-14	G	14	20S	36E

SAMPLE ID	PID	SAMPLE ID	PID
Bottom 5 Point Composite	296.8		
4 Wall Composite	104		

COPY

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

SIGNATURE: *Doyle*

DATE: 5/21/2011



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

February 03, 2012

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

RE: EME JUNCTION G-14

Enclosed are the results of analyses for samples received by the laboratory on 07/20/11 16:27.

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](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

Caley D. Keene  
Lab Director/Quality Manager

COPY

**Analytical Results For:**

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

 Received: 07/20/2011  
 Reported: 02/03/2012  
 Project Name: EME JUNCTION G-14  
 Project Number: NONE GIVEN  
 Project Location: NOT GIVEN

 Sampling Date: 07/20/2011  
 Sampling Type: Soil  
 Sampling Condition: \*\* (See Notes)  
 Sample Received By: Jodi Henson

**Sample ID: IMPORTED SOIL (H101514-01)**

Chloride, SM4500Cl-B

mg/kg

Analyzed By: HM

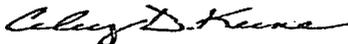
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	07/21/2011	ND	448	112	400	3.51	

COPY

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



Celey D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

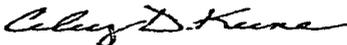
- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- \*\* Samples not received at proper temperature of 6°C or below.
- \*\*\* Insufficient time to reach temperature.
- Chloride by SM4500C-B does not require samples be received at or below 6°C  
Samples reported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

COPY

Cardinal Laboratories

\* = Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



Celey D. Keene, Lab Director/Quality Manager



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

101 East Marland, Hobbs, NM 88240  
(505) 393-2326 FAX (505) 393-2476

Company Name: <u>Rice</u>		<b>BILL TO</b>		<b>ANALYSIS REQUEST</b>											
Project Manager: <u>Hook Campbell</u>		P.O. #:													
Address: <u>1322 W. Taylor</u>		Company:													
City: <u>Hobbs</u> State: <u>NM</u> Zip: <u>88240</u>		Attn:													
Phone #: Fax #:		Address:													
Project #: Project Owner:		City:													
Project Name: <u>B-14 Junction</u>		State: Zip:													
Project Location: <u>EME Junction B-14 <del>2234</del>*</u>		Phone #:													
Sampler Name: <u>OSCAR FRAYL</u>		Fax #:													
FOR LAB USE ONLY															
Lab I.D.	Sample I.D.	(GRAB OR COMPI.)	# CONTAINERS	MATRIX					PRESERV.	SAMPLING		CL			
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE/COOL		OTHER:	DATE	TIME
H1015141	Imported Soil	6	1			X					X			7-20-11	8:30 AM

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: <u>[Signature]</u>	Date: <u>7-20-11</u>	Received By: <u>[Signature]</u>	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
Relinquished By:	Date: <u>7-27</u>	Received By:	Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	Sample Condition Cool Intact <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Checked By: <u>[Signature]</u>	REMARKS: <u>H-Corder@rice-ecs.com; L-Weinheimer@rice-ecs.com;</u> <u>2-Corder@rice-ecs.com; P-Baker@rice-ecs.com;</u> <u>B-Frayl@rice-ecs.com; K-Sanos@rice-sud.com</u> <u>* Changed as per Amy 2/2/12. ch</u>	

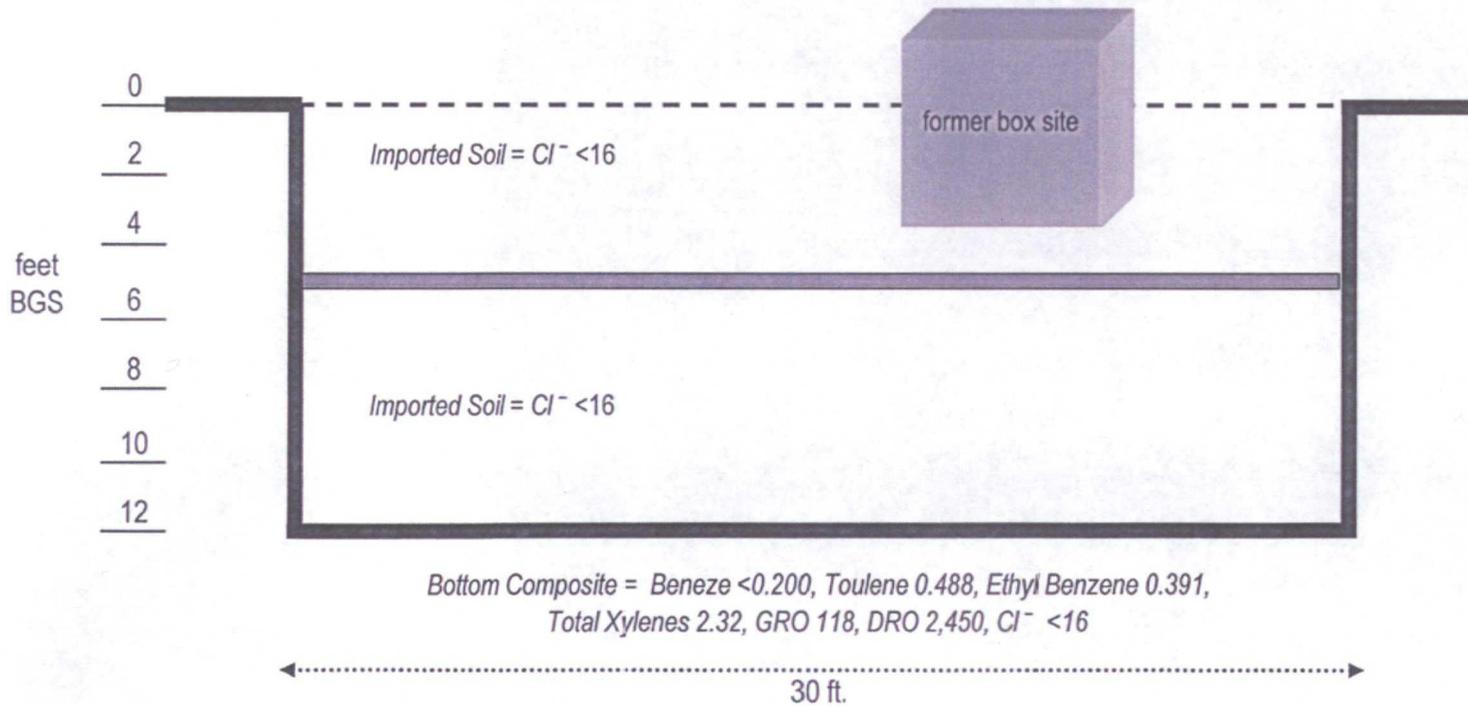
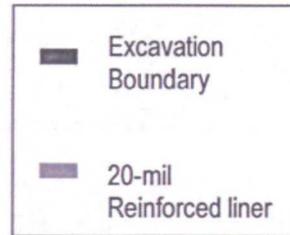
† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

EME Jct. G-14  
Unit 'G', Sec. 14, T20S, R36E

### Excavation Cross-Section

N

S



# CHLORIDE CONCENTRATION CURVE

RICE Operating Company

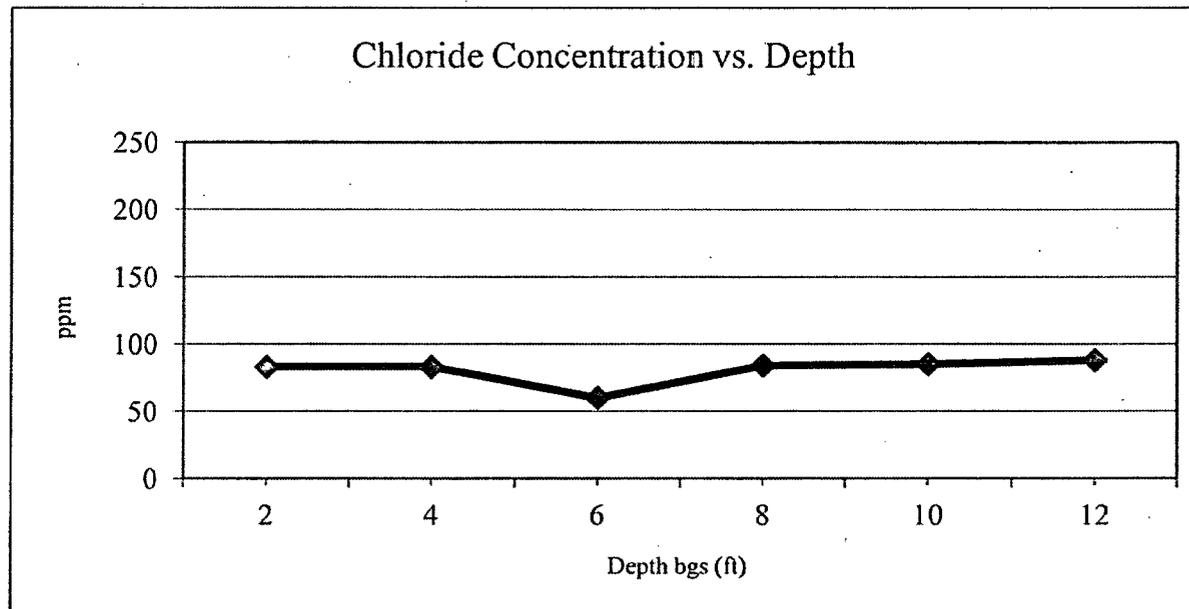
## EME Jct. G-14

Unit 'G', Sec. 14, T20S, R36E

Backhoe samples 15' east of source

Depth bgs (ft)	[Cl <sup>-</sup> ] ppm
2	83
4	83
6	60
8	84
10	85
12	88

Groundwater = 20 ft





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

## REVEGETATION FORM

### 1. General Information

Site name: EME JCT G-14						
U/L	Section	Township	Range	County	Latitude	Longitude
G	14	20	36	LEA	32° 34.563'	103° 19.481'
Contact Name: Z. CONDER						
Email: zconder@rice-ecs.com						
Site size: 37,548 square feet			Map detail of site attached <input checked="" type="checkbox"/>			
Additional information:						

### 2. Soils

*\*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"/>	Depth (in):
Texture:		Describe soil & subsoil: Sandy with caliche subsoil		
Soil prep methods: Rip <input type="checkbox"/>	Depth(in):	Disc <input type="checkbox"/>	Depth (in):	Rollerpack <input type="checkbox"/>
Date completed: 8/1/2011				

### 3. Bioremediation

Fertilizer <input type="checkbox"/>	Hay <input type="checkbox"/>	Other <input type="checkbox"/>
Type: n/a	Describe:	
Lbs/acre:		

### 4. Seeding

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

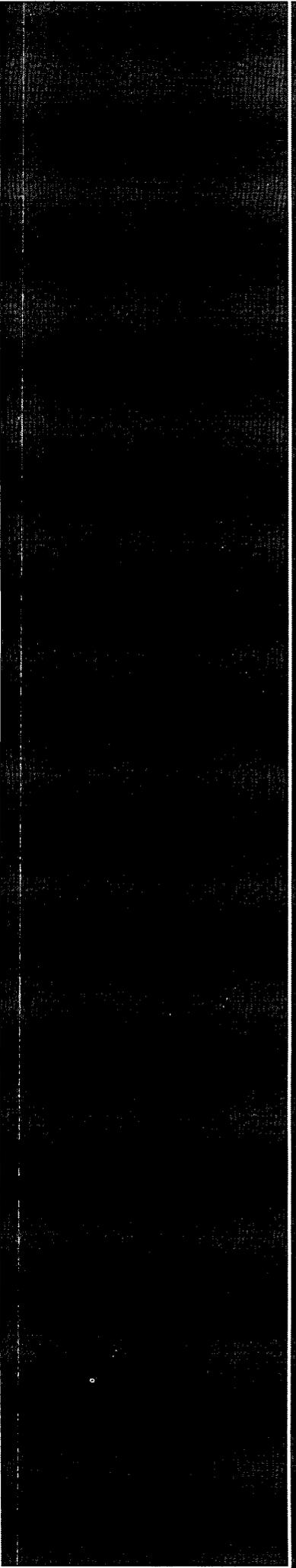
Custom seed mix <input type="checkbox"/>	Prescribed mix <input type="checkbox"/>	Seed mix name: Blue Grama 38lbs	Seeding date: 11/3/2011
Broadcast <input checked="" type="checkbox"/>			
Method: seed spreader			
Soil conditions during seeding: Dry <input checked="" type="checkbox"/> Damp <input type="checkbox"/> Wet <input type="checkbox"/>			
Photos attached <input type="checkbox"/>	Observations:		
Number of photos:			

### 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: Jacob Kamplain	Title: Environmental Specialist	Date: 11/3/2011
Signature:		

COPY



# Appendix B

## Quality Procedures

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

# Rice Environmental Consulting and Safety

## Quality Procedures

### Table of Contents

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

## **Rice Environmental Consulting and Safety**

---

### **Quality Procedure Soil Samples for Transportation to a Laboratory**

---

#### **1.0 Purpose**

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

#### **2.0 Scope**

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

#### **3.0 Preliminary**

- 3.1 Obtain sterile sampling containers from the testing laboratory designated to conduct analyses of the soil.
- 3.2 If collecting TPH, BTEX, RCRA 8 metals, cation /anions or O&G, the sample jar may be a clear 4 oz. container with Teflon lid. If collecting PAH's, use an amber 4 oz. container.

#### **4.0 Chain of Custody**

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

#### **5.0 Sampling Procedure**

- 5.1 Do not touch the soil with your bare hands. Use new nitrile gloves to help minimize any contamination.
- 5.2 Go to the sampling point with the sample container. If not analyzing for ions or metals, use a trowel to obtain the soil.

- 5.3 Pack the soil tightly into the container leaving the top slightly domed. Screw the lid down tightly. Enter the time of collection onto the sample collection jar label.
- 5.4 Place the sample directly on ice for transport to the laboratory if required.
- 5.5 Complete the Chain of Custody form to include the collection times for each sample. Deliver all samples to the laboratory.

## **6.0 Documentation**

- 6.1 The testing laboratory shall provide the following minimum information:
  - a. Project and sample name.
  - b. Signed copy of the original Chain of Custody Form including the time the sample was received by the lab.
  - c. Results of the requested analyses
  - d. Test Methods employed
  - e. Quality Control methods and results

## **Rice Environmental Consulting and Safety**

---

### **QUALITY PROCEDURE Chloride Titration Using 0.282 Normal Silver Nitrate Solution**

---

#### **1.0 Purpose**

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

#### **2.0 Scope**

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

#### **3.0 Sample Collection and Preparation**

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

#### **4.0 Sample Preparation**

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

#### **5.0 Titration Procedure**

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

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

5.4 Record the ml of silver nitrate used.

### 6.0 Calculation

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

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

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

Record all results on the delineation form.

---

## Rice Environmental Consulting and Safety

---

### Quality Procedure Development of Cased Water-Monitoring Wells

---

#### 1.0 Purpose

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

#### 2.0 Scope

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

#### 3.0 Sample Collection and Preparation

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

#### 4.0 Purging

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

#### 5.0 Water Disposal

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

#### 6.0 Records

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

## Rice Environmental Consulting and Safety

---

### Quality Procedure Sampling of Cased Water-Monitoring Well

---

#### 1.0 Purpose

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

#### 2.0 Scope

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

#### 3.0 Preliminary

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

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

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

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

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

V=Volume

$\pi = \text{pi}$

r=inside radius of the well bore

h=maximum height of well bore in water table

Example:

$\pi$	$r^2$	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.

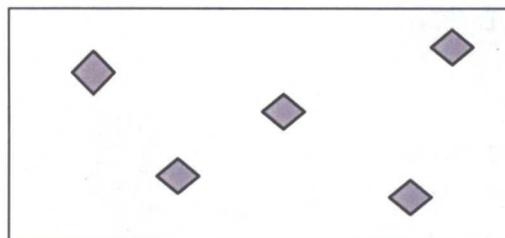
#### 3.0 Sampling Procedure

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<sup>0</sup>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, NMOCDBTEX 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.

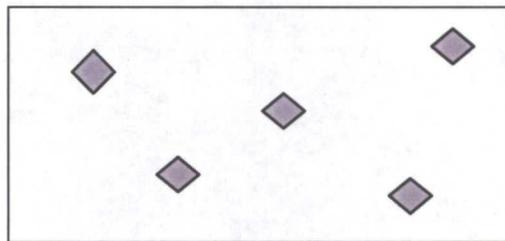
#### **5.0 Sampling Procedure**

- 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.