

1R – 428-58

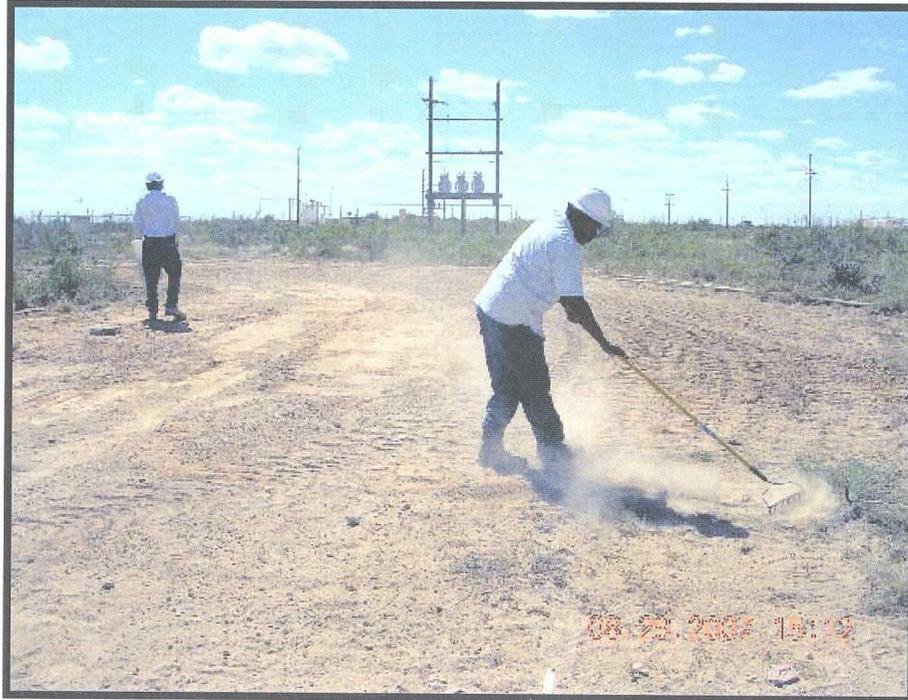
**CLOSURE
REPORT**

DATE:

JAN 17, 2008

1R428-58
Closure Report
January 17, 2008

RECEIVED
JAN 22 2008
Environmental Bureau
Oil Conservation Division



F-33 Vent, NMOCD Case #1R0428-58

**Rice Operating Company
Closure Report**

R.T. Hicks Consultants, Ltd.

901 Rio Grande Blvd. NW, Suite F-142
Albuquerque, NM 87104

R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266-0745

January 17, 2008

Mr. Ed Hansen
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

RECEIVED
JAN 22 2008
Environmental Bureau
Oil Conservation Division

RE: NMOCD Case # 1R0428-58, F-33 Vent
Hobbs SWD System Abandonment
Closure Report

Dear Mr. Hansen:

This letter and Appendices are the final Closure Report for the F-33 Vent site. The NMOCD approved Corrective Action Plan (Section 6.0, pages 11-12) proposed remedy included excavation of soils in the upper vadose zone to the dimensions of 10 x 10 x 12 feet deep, installation of a clay layer, native soil was mixed with clean, imported soil, as shown in Figure 1, below. The surface was re-seeded on August 29th, 2007 with native grass seed, creating an infiltration barrier by re-vegetation of the ground surface.

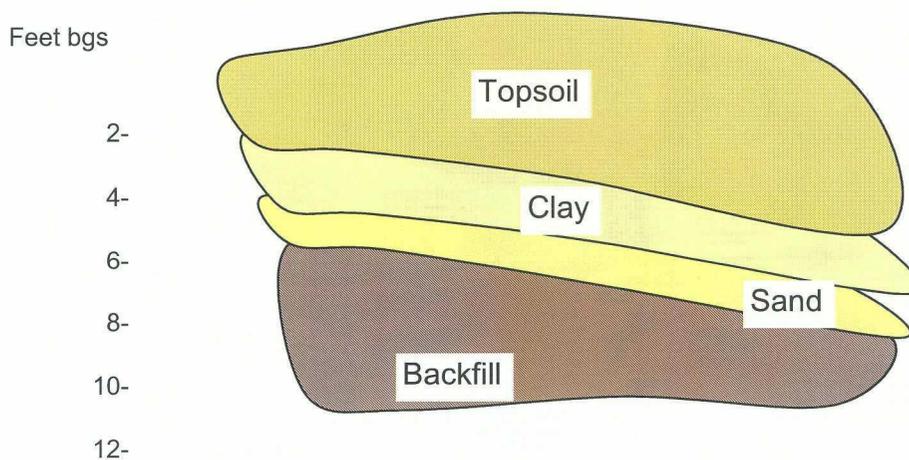


Figure 1. Schematic diagram of ET Infiltration Barrier

Appendix A includes the junction box closure form as well as the clay density test, disposal manifest for the 18 ft³ of off-hauled soil, laboratory results and PID measurements on backfill, and photographs documenting work at the site. Appendix B includes copies of previous submissions and the NMOCD approval email.

January 17, 2008
Page 2

We respectfully request NMOCD approve site closure in writing. Thank you for your attention to this matter.

Sincerely,
R.T. Hicks Consultants, Ltd.



Katie Lee
Staff Scientist

Copy: Rice Operating Company
Hobbs NMOCD Office

Appendix A

RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	NEW BOX DIMENSIONS - FEET		
							Length	Width	Depth
Hobbs	F-33 vent (#1R428-58)	F	33	18S	38E	Lea	no box--System Abandonment		

LAND TYPE: BLM _____ STATE X FEE LANDOWNER _____ OTHER _____
 Depth to Groundwater 65 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10
 Date Started 5/22/2006 Date Completed 8/29/2007 NMOCD Witness no
 Soil Excavated 44 cubic yards Excavation Length 10 Width 10 Depth 12 feet
 Soil Disposed 18 cubic yards Offsite Facility Sundance Location Eunice, New Mexico

FINAL ANALYTICAL RESULTS: Sample Date 8/29/2007 Sample Depth n/a

All laboratory test results are completed by using an approved laboratory and testing procedures pursuant to NMOCD guidelines.

Sample Location	PID (field) ppm	Chloride mg/kg
BACKFILL composite (2:1 blend)	28.1 (pile 1)	128
	49.7 (pile 2)	

General Description of Remedial Action:

This junction box site was decontaminated during the summer of 2006 using soil borings and backhoe trenches in accordance with the Investigation & Characterization Plan submitted by R.T. Hicks Consultants (Jan. 2006). The Corrective Action Plan (CAP) for this site was verbally approved by NMOCD on 7/18/2007 and confirmed via email on 8/8/2007. As prescribed in the CAP, the former box site was excavated to the dimensions of 10 x 10 x 12-ft-deep during Aug. 28-29, 2007. A clay barrier was installed below the surface and after the site was backfilled with native soil mixed with clean, imported soil. The surface was seeded with a blend of native vegetation and is expected to return to productive capacity at a normal rate. The enclosed Closure Report (Dec. 2007) by Hicks documents these activities and requests regulatory closure of this site.

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

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE Kristin Farris Pope
 DATE 12/5/2007 TITLE Project Scientist



LABORATORY TEST REPORT
PETTIGREW & ASSOCIATES, P.A.
 1110 N. GRIMES
 HOBBS, NM 88240
 (505) 393-9827



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

To: Rice Operating
 Attn: Hack Conder
 122 W. Taylor
 Hobbs, NM 88240

Material: Red Clay (Wallach)

Test Method: ASTM: D 2922

Project: General Information
 Project No. 2007.1007

Date of Test: August 29, 2007

Depth: 4' Below Finished Subgrade

Depth of Probe: 10"

Test No.	Location	Dry Density % Maximum	% Moisture	Depth
SG 9	Hobbs F-33 Vent	95.0	10.7	

Control Density: 104.4
 ASTM: D 698

Optimum Moisture: 20.3%

Required Compaction: 85% - 95%

Densometer ID: 2505

Lab No.: 07 7811

PETTIGREW & ASSOCIATES

Copies To: Rice

BY: _____

BY: _____ P.E.

Sundance Services, Inc.

P.O. Box 1737 ★ Eunice, New Mexico 88231

(505) 394-2511

Ticket # 59611

Lease Operator/Shipper/Company: <u>Rice</u>		
Lease Name: <u>Hills F-33 Ugent</u>		
Transporter Company: <u>Westwood</u>	Time: <u>9:44</u>	AM/PM
Date: <u>5-29-07</u>	Vehicle No. <u>313</u>	Driver No. <u>313</u>
Charge To: <u>Rice</u>		

TYPE OF MATERIAL		
<input type="checkbox"/> Produced Water	<input type="checkbox"/> Drilling Fluids	<input type="checkbox"/> Completion Fluids
<input type="checkbox"/> Tank Bottoms	<input checked="" type="checkbox"/> Contaminated Soil	<input type="checkbox"/> C-117 No.:
<input type="checkbox"/> Other Materials	<input type="checkbox"/> BS&W Content:	
Description: <u>Oil</u>	<input type="checkbox"/> JETOUT	<input type="checkbox"/> CALLOUT

VOLUME OF MATERIAL	BBLS. <u>6</u>	YARDS
--------------------	----------------	-------

AS A CONDITION TO SUNDANCE SERVICES, INC.'S ACCEPTANCE OF THE MATERIALS SHIPPED WITH THIS JOB TICKET, OPERATOR/SHIPPER REPRESENTS AND WARRANTS THAT THE WASTE MATERIAL SHIPPED HERewith IS MATERIAL EXEMPT FROM THE RESOURCE CONSERVATION AND RECOVERY ACT OF 1976, AS AMENDED FROM TIME TO TIME, 40 U.S.C. 6901, ET SEQ., THE NM HEALTH AND SAF. CODE 361.001 ET SEQ., AND REGULATIONS RELATED THERETO, BY VIRTUE OF THE EXEMPTION AFFORDED DRILLING FLUIDS, PRODUCED WATERS, AND OTHER WASTE ASSOCIATED WITH THE EXPLORATION, DEVELOPMENT OR PRODUCTION OF CRUDE OIL OR NATURAL GAS OR GEOTHERMAL ENERGY.

ALSO AS A CONDITION TO SUNDANCE SERVICES, INC.'S ACCEPTANCE OF THE MATERIALS SHIPPED WITH THIS JOB TICKET, TRANSPORTER REPRESENTS AND WARRANTS THAT ONLY THE MATERIAL DELIVERED BY OPERATOR/SHIPPER TO TRANSPORTER IS NOW DELIVERED BY TRANSPORTER TO SUNDANCE SERVICES, INC.'S FACILITY FOR DISPOSAL.

THIS WILL CERTIFY that the above Transporter loaded the material represented by this Transporter Statement at the above described location, and that it was tendered by the above described shipper. This will certify that no additional materials were added to this load, and that the material was delivered without incident.

DRIVER: <u>M. L. [Signature]</u>
FACILITY REPRESENTATIVE: <u>[Signature]</u>

Sundance Services, Inc.

P.O. Box 1737 ★ Eunice, New Mexico 88231

(505) 394-2511

Ticket # 59578

Lease Operator/Shipper/Company: <u>D. E. 33</u>		
Lease Name: <u>Hobbs E. 33 Hunt Hunt</u>		
Transporter Company: <u>WINT WORKS</u>	Time: <u>2:42</u>	AM/PM
Date: <u>8-20-07</u>	Vehicle No. <u>313</u>	Driver No. <u>313</u>
Charge To: <u>Eunice</u>		

TYPE OF MATERIAL		
<input type="checkbox"/> Produced Water	<input type="checkbox"/> Drilling Fluids	<input type="checkbox"/> Completion Fluids
<input type="checkbox"/> Tank Bottoms	<input checked="" type="checkbox"/> Contaminated Soil	<input type="checkbox"/> C-117 No.:
<input type="checkbox"/> Other Materials	<input type="checkbox"/> BS&W Content:	
Description: <u>DID</u>	<input type="checkbox"/> JETOUT	<input type="checkbox"/> CALLOUT

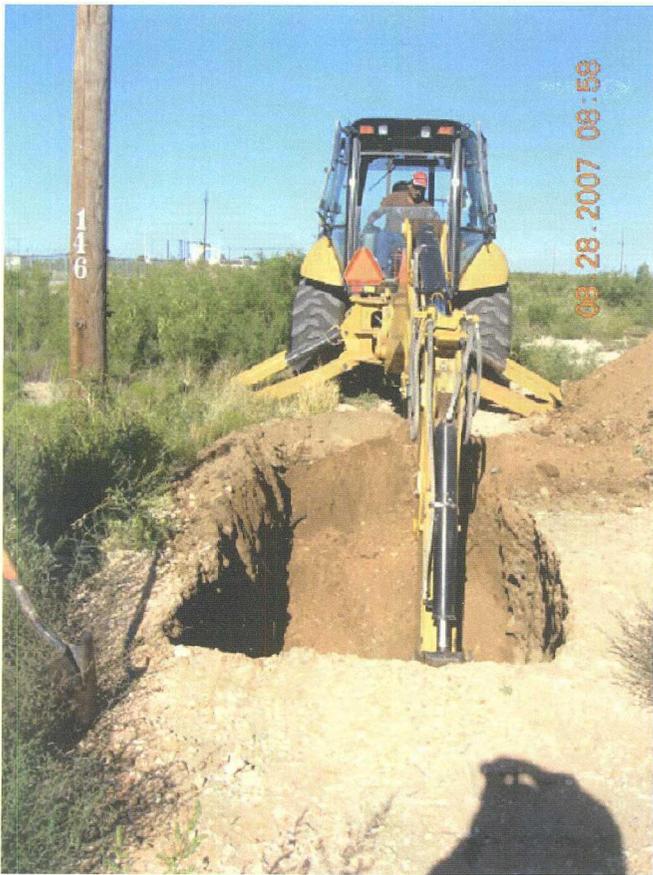
VOLUME OF MATERIAL	BBLs. <u>12</u>	YARDS
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AS A CONDITION TO SUNDANCE SERVICES, INC.'S ACCEPTANCE OF THE MATERIALS SHIPPED WITH THIS JOB TICKET, OPERATOR/SHIPPER REPRESENTS AND WARRANTS THAT THE WASTE MATERIAL SHIPPED HERewith IS MATERIAL EXEMPT FROM THE RESOURCE, CONSERVATION AND RECOVERY ACT OF 1976, AS AMENDED FROM TIME TO TIME, 40 U.S.C. 6901, ET SEQ., THE NM HEALTH AND SAF. CODE 361.001 ET SEQ., AND REGULATIONS RELATED THERETO, BY VIRTUE OF THE EXEMPTION AFFORDED DRILLING FLUIDS, PRODUCED WATERS, AND OTHER WASTE ASSOCIATED WITH THE EXPLORATION, DEVELOPMENT OR PRODUCTION OF CRUDE OIL OR NATURAL GAS OR GEOTHERMAL ENERGY.

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THIS WILL CERTIFY that the above Transporter loaded the material represented by this Transporter Statement at the above described location, and that it was tendered by the above described shipper. This will certify that no additional materials were added to this load, and that the material was delivered without incident.

DRIVER: <u>M. T. [Signature]</u>
FACILITY REPRESENTATIVE: <u>[Signature]</u>



Hobbs F-33 vent
Excavating 10' x 10' x 12' hole



Hobbs F-33 vent
Laying Clay Layer @ 4'



Hobbs F-33 vent
Compaction Layer Test



Hobbs F-33 vent
Seeding disturbed area

Appendix B

Katie Lee

From: Kristin Pope [kpope@riceswd.com]
Sent: Wednesday, October 31, 2007 3:30 PM
To: Katie Lee
Subject: Fw: Summary of July 18 meeting

----- Original Message -----

From: Hansen, Edward J., EMNRD
To: Kristin Pope
Cc: Carolyn Haynes ; Scott Curtis ; Sanchez, Daniel J., EMNRD ; Price, Wayne, EMNRD
Sent: Wednesday, August 08, 2007 11:26 AM
Subject: RE: Summary of July 18 meeting

Kristin,
Your summary appears to be accurate and complete.
Attached is the summary that you sent with comments from me [OCD case #s and formal (email) approval dates].
I'll be sending more formal (via email) approvals for the closures and some of the CAPs soon.
Also, I will review and comment on the other CAPs and the APs a.s.a.p.

Thanks for the summary.
Let me know if you have any questions regarding my comments.

Edward J. Hansen
Hydrologist
Environmental Bureau
505-476-3489

From: Kristin Pope [mailto:kpope@riceswd.com]
Sent: Wednesday, August 08, 2007 10:34 AM
To: Sanchez, Daniel J., EMNRD; Price, Wayne, EMNRD; Hansen, Edward J., EMNRD
Cc: Carolyn Haynes; Scott Curtis
Subject: Summary of July 18 meeting

Gentlemen,

Please review the attached summary of our July 18 meeting. Please let me know if anything needs to be changed. OCD and ROC have already moved forward with several of the projects listed but I would like written confirmation for our files. Thanks again for your time.

Kristin Farris Pope
Project Scientist
RICE Operating Company
Hobbs, New Mexico
(505) 393-9174

This inbound email has been scanned by the MessageLabs Email Security System.

10/31/2007

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OCD/ROC MEETING SUMMARY

July 18, 2007

CLOSURES

1. Abatement Completion Report for BD Zachary Hinton EOL submitted by R.T. Hicks Consultants on 3/15/2007. AP-50
2. Abatement Completion Report for EME Marathon Barber (jct. E-5) submitted by R.T. Hicks Consultants on 5/16/2007. 1R0427-91 *Approved soil work completed Dec. 2006*
3. Closure Report for Hobbs I-29 EOL boot submitted by R.T. Hicks Consultants on 5/23/2007. Approved soil work completed in 2006. 1R428-42
4. Closure Request for BD jct. N-29 submitted by R.T. Hicks Consultants on 2/10/2007. #1R0426-37

APPROVALS

1. Stage I&2 Abatement Plan for Vacuum F/G-35 SWD submitted by R.T. Hicks Consultants; proof of public notice submitted Feb. 2006; AP-59
Vadose zone remedy complete; reclaiming surface; groundwater treatment ongoing at F-35; evaluating treatment potential at G-35
2. INVESTIGATION & CHARACTERIZATION PLANS (ICP)
NMOCD Approved (1 – 14) via email August 6, 2007
 1. Hobbs O-5 Historical Release by Hicks on 4/11/2007 #1R428-69
 2. EME State 'H' EOL by P. Galusky on 5/1/2007 #1R427-15
 3. Justis E-1 vent by Highlander on 11/29/2006. #1R0432-06
 4. Vacuum State 'P' EOL by Galusky on 4/20/07 #1R425-26
 5. Vacuum jct. F-31-1 by Hicks on 4/17/07. #1R425-27
 6. BD P-26-1 vent by Trident on 2/12/2007. #1R0426-106
 7. BD jct. P-26-2 by Trident on 2/12/2007. #1R0426-107
 8. Hobbs jct. E-4, M-4 vent, & N-4 vent (1 plan) by Hicks on 4/17/07 #1R428-71, #1R428-76, #1R428-68, respectively
 9. EME L-6 boot by Trident on 12/1/2006. #1R0427-09
 10. EME B-8 leak by Trident on 12/1/2006. #1R0480
 11. EME jct. F-18 by Arcadis on 7/6/2007 #1R427-16
 12. BD jct. F-25-1 by Arcadis on 7/12/2007 #1R426-10
 13. EME L-15-1 vent by Galusky on 7/16/2007 #1R427-173
 14. EME State 'Q' EOL boot by Galusky on 7/16/2007 #1R427-174
3. Corrective Action Plan (CAP) for Hobbs E-15 SWD submitted on 11/28/2006 by Arcadis G&M. *Approved with clay or GCL condition* #1R428-40
NMOCD Approved with conditions via email July 27, 2007

4. CAP for Hobbs F-29-1b boot submitted by R.T. Hicks Consultants on 4/2/2007. #1R428-45
5. CAP for Hobbs O-29 vent submitted by R.T. Hicks Consultants on 4/2/2007. #1R428-43
6. CAP for Hobbs I-29 vent submitted by R.T. Hicks Consultants on 4/13/2007. #1R428-41
7. CAP for Hobbs jct. E-33-1 submitted by R.T. Hicks Consultants on 1/2/2007. #1R428-67
8. CAP for Hobbs B-32 boot submitted by R.T. Hicks Consultants on 1/22/2007. #1R428-57
9. CAP for Hobbs jct. E-32-1 submitted by R.T. Hicks Consultants on 1/22/2007. #1R428-65
10. CAP for Hobbs F-33 vent submitted by R.T. Hicks Consultants on 1/22/2007. #1R428-58
11. CAP for EME A-2 leak submitted by Highlander on 5/23/2007. # 1R0427-62
condition: install clay at 4 ft instead of 3 ft as proposed
12. CAP for jct. A-2-1 submitted by Highlander on 5/23/2007. # 1R0427-177
condition: install clay at 4 ft instead of 3 ft as proposed
13. CAP for EME I-1 off-site encroachment submitted by Trident on 2/27/07. #1R0464

Rule 19 ABATEMENT PLANS

OCD granted approval to install monitoring wells as proposed while reviewing plans for administrative completeness:

1. Stage 1 & 2 Abatement Plan for Hobbs F-29 SWD submitted on 10/27/2006 by R.T. Hicks Consultants. *Public notice ready to submit upon approval.* AP-64
2. Stage 1 Abatement Plan for EME C-16(1) leak submitted on 5/25/2007 by L. Peter Galusky; #1R0476 *Public notice ready to submit upon approval.*
3. Stage 1 Abatement Plan for EME C-16(2) leak submitted on 5/25/2007 by L. Peter Galusky; #1R0477 *Public notice ready to submit upon approval.*
4. Stage 1&2 Abatement Plan for BD Santa Rita release site submitted on 12/11/2006 by Trident. AP-58 *want to drill more MWs*

5. Stage 1&2 Abatement Plan for EME jct. M-16-1 submitted on 1/29/2007 by Arcadis G&M. AP-42
6. Stage 1&2 Abatement Plan for EME jct. A-20 submitted on 1/29/2007 by Arcadis G&M. AP-43
7. Stage 1 Abatement Plan for BD H-35 pit submitted by Arcadis G&M on 3/23/2007. #1R0216
8. Stage 1 & 2 Abatement Plan for Justis jct. L-1 boot submitted by Highlander on 1/17/07. AP-48

OCD WILL REVIEW

1. Stage 1 Final Report & Closure Request for EME jct. K-33-1 submitted by Whole Earth on 12/28/2006. AP-60
OCD requests confirmation of regional gradient/impact
2. CAP for EME M-5 SWD submitted by Hicks on 9/10/2004. #1R424
3. Rule 19 Release and CAP for soil for BD jct. F-17 submitted by Highlander on 8/30/06. *Additional information requested by OCD was submitted on 12/29/06 and presented at meeting on 2/21/2007.* AP-47
4. Request for Release from Rule 19 for EME H-13 release submitted on 8/30/2006 by Highlander Environmental. AP-44
Additional information requested by OCD was submitted on 12/29/06 and presented at meeting on 2/21/2007. Showed current site photos.
5. Final Investigation Report & CAP for EME jct. K-6 submitted by Trident on 3/7/2007. AP-46.

OTHER

1. CAP for BD K-4 leak submitted by Highlander on 4/23/2007. #1R0459
*APPROVAL to begin pumping from MW-1 as proposed;
OCD will evaluate CAP (soil work)*
2. CAP for BD O-17-1 vent submitted by Highlander on 5/11/2007. #1R426-12
*No groundwater impact; soil work only
ROC WILL REVISE AND RE-SUBMIT FOR CLARIFICATION*

3. GEOSYNTHETIC CLAY LINER (GCL) option for Junction Box Upgrade Program

Modification request required; can be emailed.

NMOCD Approved with conditions via email July 27, 2007

January 15, 2007

**Corrective Action Plan
for F-33**

**Vent Junction Box Site
Hobbs Salt Water Disposal System
NMOCD Case #: 1R0428-58**

R.T. Hicks Consultants, LTD

901 RIO GRANDE BLVD. NW, SUITE F-142, ALBUQUERQUE, NM 87104

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Appendix A — Investigation Characterization Plan

Appendix B — Results of Field Program

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▼ 1.0 EXECUTIVE SUMMARY

This Corrective Action Plan presents the results of the characterization activities performed by R.T. Hicks Consultants (Hicks Consultants) and Rice Operating Company (ROC) at the F-33 Vent Junction Box site located in the Hobbs Salt Water Disposal System (SWD) and proposes closure of the site after implementation of the selected remedy.

The selected remedy includes excavation and blending of the upper 16 feet of hydrocarbon-impacted soil, placing a clay barrier beneath the root zone, creation of an infiltration barrier through surface restoration and re-vegetation of the site, and natural biodegradation of the small mass of hydrocarbons that may reside in the vadose zone below the practical reach of a backhoe. Excavation and disposal of high concentration areas will be performed as required to facilitate. This remedy is protective of ground water quality, human health and the environment. After re-vegetation of the site, ROC will submit a final closure report.

Data Summary

1. Hicks Consultants supervised field activities at the F-33 Vent site in May 2006. This involved general reconnaissance as well as supervision of backhoe sampling of the upper vadose zone.
2. Due to safety concerns with the high voltage powerline immediately above the former vent, a backhoe was used to collect samples instead of a drilling rig, as originally proposed in the NMOCD-approved workplan. Samples were collected at 2 ft sample intervals from ground surface to a depth of 12 ft at points located approximately 10 feet east, west, north, and south of the former vent. In addition, samples were collected at 1 ft intervals to a depth of 16 ft at the former vent. Samples were field-tested for chloride content and screened with a photoionization detector (PID) for indications of hydrocarbons. Soil samples were also submitted to a laboratory for more detailed hydrocarbon analysis.
3. Chloride concentration data show concentrations in the vadose zone are less than 1,000 ppm. At the vent site, chloride concentrations were highest (848 mg/kg) at a depth of 6 feet bgs directly beneath the vent location and declined below 6 feet bgs to a concentration of 230 ppm at 16 feet. In all sampling excavations 10 feet east,

north, south and west, chloride concentrations were less than 500 ppm. Chloride levels showed a consistent decline with depth.

4. Hydrocarbon impact is confined to the close vicinity of the vent and within the upper portion of the vadose zone. Although some samples from excavations detected hydrocarbon vapors in excess of 100 ppm, laboratory analyses detected neither benzene nor toluene. At the vent site, concentrations of ethylbenzene and xylene were 37.7 and 65.3 mg/kg respectively at a depth of 12 feet below land surface. At 16 feet below land surface in this same sampling excavation, the ethylbenzene concentration was 27.7 mg/kg and the xylene concentration was 0.3 mg/kg. At sampling sites north, south, east and west of the vent, ethylbenzene and xylene concentrations are less than 1 ppm.
5. On July 20, 2006, an air rotary drilling rig was used to advance two soil borings as close to the former vent as possible, in an attempt to provide more certainty that hydrocarbon impact did not extend laterally into the deep vadose zone. These borings confirmed no chloride or hydrocarbon impact to the vadose zone at these two locations 22 feet east and 30 feet west of the vent, respectively. The borings were terminated at a depth of 50 feet bgs.
6. Based on data from other nearby sites, particularly the E-33-1 junction box site, depth to groundwater at the F-33 vent site is estimated at approximately 65 feet bgs.

Conclusions

1. At the vent site, concentrations of hydrocarbons decline with depth, based upon PID readings. Laboratory analyses show that neither benzene nor toluene were detected in any samples. Xylene declines from 65.3 mg/kg at 14 feet bgs to 0.3 mg/kg at 16 feet bgs and ethylbenzene declines from 37.7 mg/kg to 27.7 mg/kg in this same depth interval. From these data we conclude that the mass of subsurface hydrocarbons is small and limited to the upper vadose zone.
2. We conclude that the mass of subsurface chloride release at this site was not large enough to necessitate detailed simulation modeling of constituent fate and transport.

3. Re-vegetation of the site will reduce the infiltration of precipitation and minimize the potential for any constituents of concern to migrate downward to ground water.

Recommendations

1. Excavation of a 10-foot by 10-foot area at the former vent site to a depth of 12 feet and blending of material in the upper 12-feet of the vadose zone until field tests of the excavated soil mixture do not exceed 100 ppm of total organic vapors using a calibrated photo-ionization meter with the appropriate lamp (headspace method) and chloride concentrations in the backfill will not exceed 1,000 ppm. Disposal of high concentration zones of hydrocarbons may be necessary to meet the prescribed concentrations.
2. A minimum 10-12 inch thick clay layer will be installed at the base of the root zone, about 4 feet below ground surface. The clay layer will be sloped to the southeast, will extend laterally to deflect any potential infiltrating water from the surface and will be compacted according to protocols applied to backfill in new pipeline trenches.
3. Restoration and re-vegetation of the ground surface.
4. Upon documentation of these actions ROC will submit a closure report for the F-33 Vent Junction Box site and request closure of the regulatory file.

▼ 2.0 BACKGROUND

The Hobbs Salt Water Disposal System (SWD), which managed produced water from the late 1950s to the present, is now closed. Future releases from the system infrastructure are not possible. With the abandonment of the system in 2002, Rice Operating Company (ROC) excavated and removed the F-33 Vent. Closure of facilities like the F-33 Vent site within Hobbs SWD followed the July 16, 2003 NMOCD approved junction box investigation plan. This plan calls for delineation of any impact from these sites during the closure process and states:

If 12 feet vertical delineation at the source reveals Target Concentrations for TPH or BTEX will not meet NMOCD guidelines or TPH and BTEX will meet guidelines but there is not a significant decline vs. depth in chloride concentration, the site-impact is judged to be outside the scope of this work plan and will become a risk-based corrective action (RBCA) project-site.

The investigation and characterization used the same protocols as described in the NMOCD-approved work plan for the Section 29 sites and the field protocols were consistent with the Investigation Characterization Plan (ICP) submitted for the site (see Appendix A). However, the presence of electrical lines over the site prevented the use of a drill rig for deep vadose zone sampling, as originally proposed. Instead, a backhoe collected samples from the former vent site and nearby locations to the maximum reach of the backhoe, which is 14-16 feet. To determine if operation of the site caused lateral migration of chloride or hydrocarbons at depth, two soil borings were advanced as close as possible to the site.

2.1 Location

Plate 1 is an aerial photograph of the site when it was active, taken between 1996 and 1998 that shows the location of the boring and nearby roads.

The site is within unit letter F, Section 33, Township 18S Range 38E.

2.2 Characterization Activities

The investigation and characterization used the same protocols as described in the NMOCD-approved work plan for the Section 29 sites and was as consistent as possible with the Investigation Characterization Plan (ICP)

R.T. HICKS CONSULTANTS, LTD.

submitted for the site (see Appendix A) as possible given the site limitations noted in section 2.0 and below. In order to permit comparison of the results from site borings with the ambient chloride concentrations in the vadose zone, collection of samples from a background soil boring was a critical element of the ICP. Appendix B shows the results of field chloride measurements from the background soil boring located about 500 feet north of F-29-1b.

Due to safety concerns with the high voltage powerline immediately above the former vent, a backhoe under ROC supervision was used on May 22, 2006, to collect samples instead of a drilling rig. Samples were collected at 2 ft sample intervals from ground surface to a depth of 12 ft at points located approximately 10 feet east, west, north, and south of the former vent (figure 1). In addition, samples were collected at 1 ft intervals to a depth of 16 ft at the former vent. Samples were field-tested for chloride content and screened with a PID for indications of hydrocarbons.

On July 20, 2006, an air rotary drilling rig was used to advance two soil borings as close to the former vent as possible, in an attempt to delineate the hydrocarbon impact vertically identified by the previous backhoe sampling activities. The first boring (B-1) was advanced at a point 22 ft east of the vent. The second (B-2) was placed 30 ft west of the vent.

Based on the results from the backhoe and soil boring sampling activities hydrocarbon-impact was confirmed in the upper vadose zone and is confined within the near vicinity of the F-33 vent. All data shows that there is negligible chloride impact to the vadose zone. Appendix B presents the results of the field program.

5

page

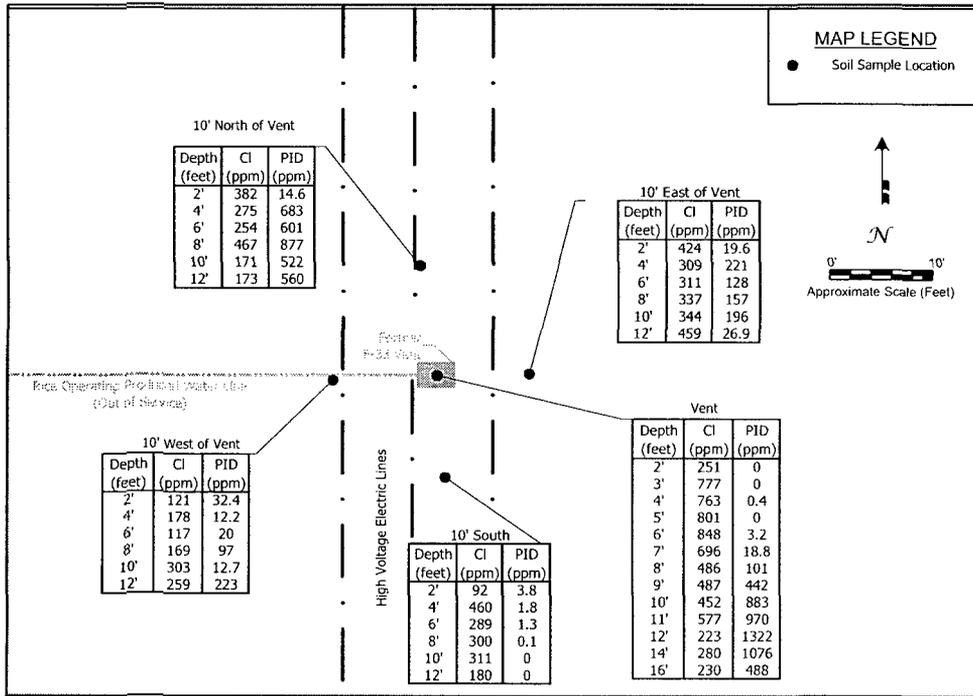


Figure 1 is a map depicting the preliminary field screening results at the site.

▼ 3.0 CHARACTERISTICS OF THE VADOSE ZONE

As the boring logs in Appendix B show, the upper 2 feet of the vadose zone at the site is composed a highly indurated caliche layer. Beneath the caliche is an 18 foot thick layer of calcic very fine-grained sand. An 8 foot thick layer of very fine to fine-grained sand with less calcic content lies below fine sand described earlier and this unit is underlain by calcic very-fine to fine-grained sand which continued to a depth of 50 feet bgs in boring B-2. A fine-grained sand with little or no calcium carbonate content was observed from 50 feet to the bottom of boring B-2 at 52 feet bgs. The lithologic logs for the two borings are included in Appendix B.

Chloride concentrations ranged from a maximum of 848 ppm at a point 6 ft below the vent source to a concentration of 92 ppm at a point 2 ft below a spot located 10 ft south of the former vent (see figure). The chloride concentration vs. depth profile is displayed in Figure 2.

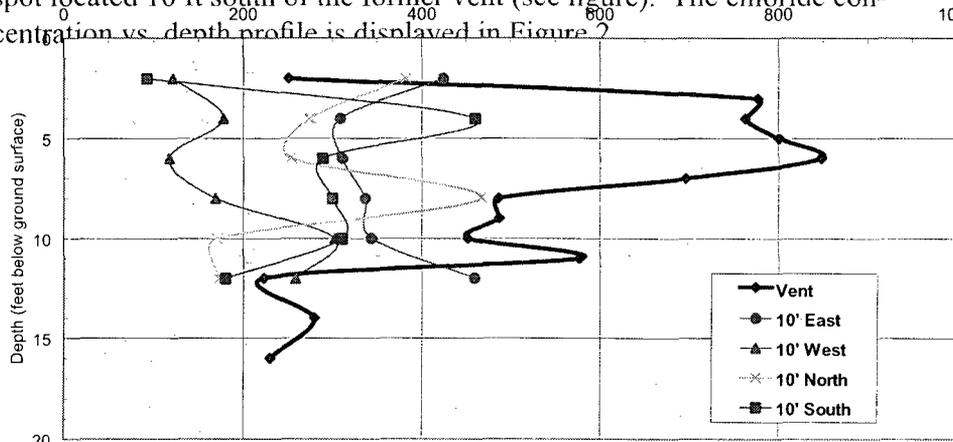


Figure 2: Chloride Concentrations (mg/kg) versus Depth

Soil samples with the highest PID readings and the deepest intervals were submitted to the laboratory for detailed hydrocarbon analysis using Methods 8260 for BTEX constituents and Method 1006 (a modified 8015 gas chromatography) for gas and diesel range organics (GRO and DRO) and carbon fractionation. The laboratory analytical reports and chain of custody documentation are included in Appendix C. The PID readings vs. depth profile is displayed in Figure 3.

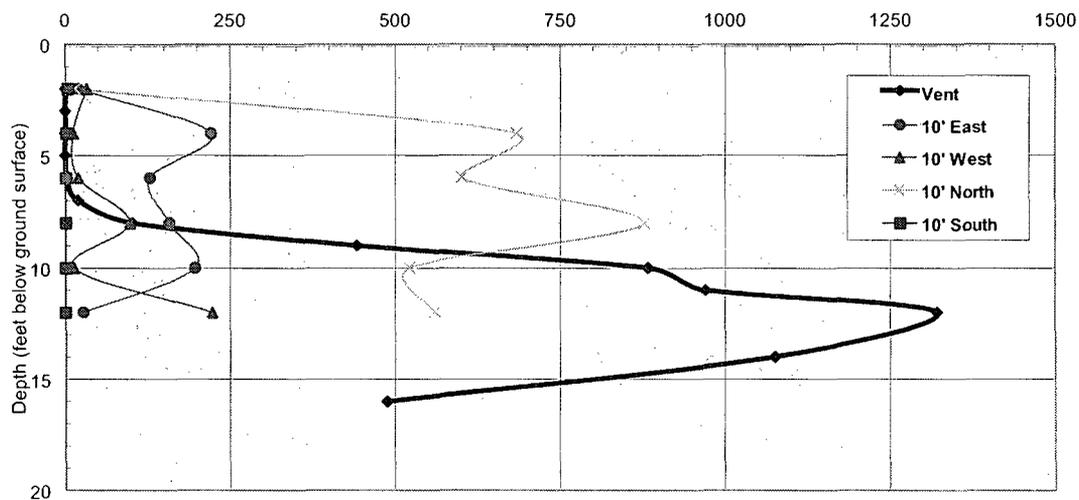


Figure 3: PID Readings (ppm) versus Depth

Based on the backhoe sampling results hydrocarbon-impact exists in the upper 16 feet of vadose zone and is confined within the near vicinity of the F-33 vent (less than 10-foot radius from the vent). Results of the laboratory analyses for regulated hydrocarbons are summarized in Table 1 below.

Location	Depth (Ft bgs)	Regulated Hydrocarbons (mg/kg)			
		B	T	E	X
Vent Source	12'	<0.025	<0.025	37.7	65.3
	16'	<0.025	<0.025	27.7	0.3
10 ft east of Vent	4'	<0.025	<0.025	0.513	0.429
	12'	<0.025	<0.025	0.516	<0.025
10 ft west of Vent	12'	<0.025	<0.025	0.117	0.058
10 ft north of vent	8'	<0.025	<0.025	0.094	0.590
	12'	<0.025	<0.025	0.073	0.293

Table 1: Summary of Regulated Hydrocarbons in the Vadose Zone

PID readings measured 0 ppm for each 2 ft interval sampled from 4 ft bgs to 20 ft bgs and then at 5 ft intervals from 20 ft bgs to 40 ft bgs in each boring. Chloride field-testing measurements varied from a minimum of 28 ppm in the 20-22 ft interval in boring B-2 to a maximum of 410 ppm in the 16-18 ft and 20-22 ft intervals of boring B-1. Results of the soil borings confirmed that any chloride and hydrocarbon impact to the vadose zone is confined to the near vicinity of the F-33 vent.

▼ 4.0 EVALUATION OF VERTICAL CHLORIDE FLUX

The chloride concentrations at the site are consistently well below 1,000 mg/kg. Moreover, chloride concentrations decrease with increasing depth, suggesting that saturated or near-saturated flow did not exist in the upper vadose zone. With the construction of the simple ET infiltration barrier described in section 6.0, unsaturated flow will decrease to near zero.

▼ 5.0 EVALUATION OF VERTICAL HYDROCARBON FLUX

With the construction of the simple ET infiltration barrier, unsaturated flow will decrease to near zero and any hydrocarbons in the upper vadose zone will not represent a threat to fresh water. Because of the low concentrations and attendant small mass of hydrocarbons neither unsaturated zone modeling or additional characterization is necessary at this site.

▼ 6.0 PROPOSED REMEDY

The proposed corrective action for this site is excavation of soils in the upper vadose zone to a depth of about 12 feet, which is the maximum reach of a standard backhoe, or to a shallower depth if field testing of soils shows that total organic vapors are less than 100 ppm. Field testing of soils employs the head-space method and a properly calibrated PID with a appropriate lamp. Soil with total organic vapor concentrations above 100 ppm as determined by field testing of soils will be hauled to an NMOCD-approved facility unless the volume of soil can be blended with clean soil and remediated on site. Upon completion of excavation activities, closure samples will be collected to verify hydrocarbon vapors do not exceed 100 ppm. Chloride concentrations in the back fill will not exceed 1,000 ppm.

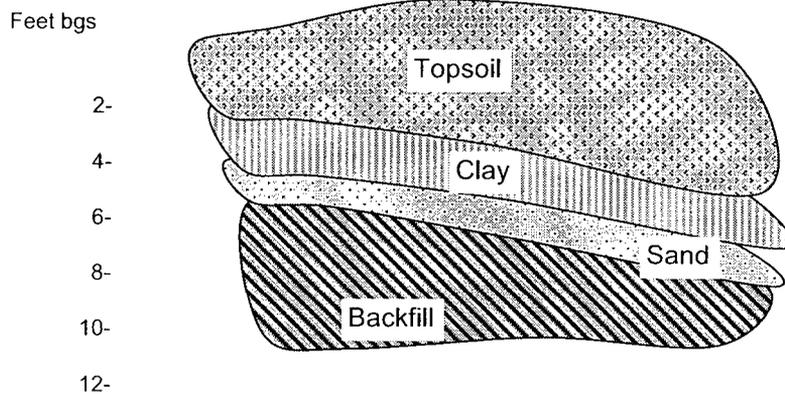


Figure 4: Schematic diagram of ET Infiltration Barrier

As shown in Figure 4, a minimum 10-12 inch thick clay layer will be installed at the base of the root zone, about 4-feet below ground surface. The clay layer will be sloped to the southeast and will extend laterally to insure sufficient deflection of any potential infiltrating water originating from the surface. The clay layer will be compacted using the same protocols employed to compact backfill in new pipeline trenches. Any excavated material that is not suitable as topsoil will be placed below the clay layer. If possible, a thin layer of coarse sand or caliche gravel excavated from the site will be placed immediately below the clay layer. The backfill (above the clay layer) will be composed of blended or remediated soil and will be placed up to a depth no higher than 2 feet bgs. This topsoil will also be compacted according to the same protocols employed for backfilling new pipeline trenches.

R.T. HICKS CONSULTANTS, LTD.

We propose incorporating clay and organic matter into the reserved topsoil and some sand/silt (as necessary) to create a 2-foot silt/loam topsoil surface layer, which will form an evapotranspiration (ET) barrier. HYDRUS-1D simulations of an ET infiltration barrier at other sites in the area and Sandia National Laboratory research of ET landfill covers demonstrate that vegetation on about 2-feet of fine-grained silt-loam effectively prevent measurable deep percolation of infiltration. This silt/loam soil combined with a vegetative cover will effectively sequester any residual hydrocarbons in the vadose zone. The surface will be contoured and reseeded with native vegetation to eliminate any ponding of precipitation and promote evapotranspiration, thereby minimizing natural infiltration. Over time, residual hydrocarbons will naturally biodegrade. Furthermore, the reduction of the deep percolation rate to essentially zero will prevent vertical migration of hydrocarbon constituents to ground water.

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UAGC

▼ 7.0 CRITERIA FOR CLOSURE

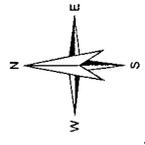
After completion of the proposed remedy, ROC will submit a final report documenting the work elements identified herein and request closure of the regulatory file.

Legend

● Junction Box Sites



Aerial Photo: <http://rgis.unm.edu>



R.T. Hicks Consultants, Ltd
901 Rio Grande Blvd NW Suite F-142
Albuquerque, NM 87104
Ph: 505.266.5004

Junction Box Site Location Map

Plate 1

January
2007

Rice Operating Company

Appendix A Investigation Characterization Plan

R. T. HICKS CONSULTANTS, LTD.

1909 Brunson Ave ▲ Midland TX 79701 ▲ 432.638.8740 ▲ Fax: 413.403.9968

CERTIFIED MAIL - RETURN RECIEPT NO. 7099 3400 0017 1737 2367

January 20, 2006

Mr. Wayne Price
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**RE: Investigation Characterization Plan: T18S R38E: E-33-1 Junction Box,
B-32 Boot, E-32-1 Junction Box, E-32-2 Junction Box, F-33 Vent**

Hobbs Salt Water Disposal System

Dear Mr. Price:

On behalf of Rice Operating Company, please accept this submission as our Initial Characterization Plan (ICP) for the five (5) sites referenced above within the Hobbs Salt Water Disposal System (Plate 1).

Rice Operating Company (ROC) is the service provider (operator) for the Hobbs Saltwater Disposal System and has no ownership of any portion of pipeline, well, or facility. A consortium of oil producers who own the Hobbs System (System Partners); provide all operating capital on a percentage ownership/usage basis. Major projects require System Partner authorization for expenditures (AFE) approval and work begins as funds are received. We will implement the work outlined herein after NMOCD approval and subsequent authorization from the System Partners.

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

1. protects public health,
2. provides the greatest net environmental benefit,
3. complies with NMOCD Rules, and
4. is supported by good science.

The last criteria employed when evaluating any proposed remedy or investigative work is confirming that there is a reasonable relationship between the benefits created by the proposed remedy or assessment and the economic and social costs.

Each site shall have three submissions or a combination of:

1. This Investigation and Characterization Plan (ICP) is a proposal for data gathering and site characterization and assessment.
2. Upon evaluation of the data and results from the ICP, a recommended remedy will be submitted in a Corrective Action Plan (CAP).
3. Finally, after implementing the remedy, a closure report with final documentation will be submitted.

**Task 1 Evaluate Chloride and BTEXN Concentrations in Soil at Five Sites,
Evaluate Ground Water Quality if Necessary**

We will follow the same protocol for characterization of the unsaturated zone at the five new ROC sites listed below.

- E-33-1 Junction Box
- B-32 Boot
- E-32-1 Junction Box
- E-32-2 Junction Box
- F-33 Vent

At each of the above-referenced sites, we will locate the sampling borehole as close as practical to the suspected release source. Earlier, we inspected each of the five sites nominated in this ICP and identified the boring location before the sites were backfilled and re-graded. Due to our recent experience with difficulties encountered in the installation of well clusters in this area, we plan to employ hollow-stem auger drilling techniques for sampling.

We will screen each sample in the field for chlorides and volatile organic compounds using the methods described in QP-03 and QP-07 (attached), respectively. Soil lithology and the presence of any observed staining or odor will be recorded. For any site, if we detect evidence of leakage within 15 feet of the water table (e.g. field chloride greater than 250 ppm in soil samples) we will complete the boring as a monitoring well in accordance with NMOCD Guidance. If three soil samples taken at 5-foot intervals test below 250 ppm chloride and below 100 ppm total volatile organic compounds, we will terminate the boring. However, all borings will penetrate at least 30 feet of the vadose zone.

Task 2 Evaluate Chloride and Hydrocarbon Flux from the Vadose Zone to Ground Water

We anticipate that one or all of the five sites selected for borehole investigation will show evidence of seepage from the source to a depth of more than 15-feet. For these sites, excavation and disposal of released material can cause more environmental damage than it cures. For such sites, we propose to employ HYDRUS-1D and a simple ground water mixing model to evaluate the potential of any residual chloride and hydrocarbon mass in the vadose zone to impair ground water quality above WQCC Standards. We have selected these two constituents for simulation modeling because each of these constituents is typically found in produced water and each is specifically regulated by New Mexico ground water regulations (WQCC). We will also employ vadose zone hydrocarbon migration predictive tools commonly employed by NMED in their PST program.

Task 3 Provide Investigative Results and/or Corrective Action Plan

Because the Hobbs SWD System no longer carries produced water, additional releases of produced water to ground water are highly unlikely. If modeling shows that the residual chloride and hydrocarbon mass in the vadose zone poses a no threat to ground water quality, we will prepare a report that makes this demonstration and request site closure.

January 20, 2006
Page 3

If simulation experiments suggest that residual constituents pose a threat to ground water quality or if the field program demonstrates impairment, we will expand upon the HYDRUS-1D model predictions described above to develop a remedy for the vadose zone. If necessary, we will simulate:

1. Excavation, disposal and replacement of clean soil to remove the chloride and hydrocarbon mass,
2. Installation of a low permeability barrier to minimize natural infiltration,
3. Surface grading and seeding to eliminate any ponding of precipitation and promote evapotranspiration, thereby minimizing natural infiltration, and
4. A combination of the above potential remedies.

We will select the vadose zone remedy that offers the greatest environmental benefit while causing the least environmental damage. If data suggest that the site has contributed chloride or hydrocarbons to ground water and caused ground water impairment, we will notify NMOCD and work collaboratively to determine the appropriate path forward.

Proposed Schedule

With NMOCD's approval of this work plan, we can perform the field activities at these sites in February or March. In late April or May, we plan to deliver any individual Correction Action Plans to address residual constituents in the vadose zone and any reports requesting site closure. If data suggest ground water impairment we plan to conduct two quarters of ground water monitoring to confirm any initial result then meet with NMOCD to develop an appropriate path forward. Your approval to move forward with this work plan will facilitate approval of expenditures by the System Partners.

Sincerely,
R.T. Hicks Consultants, Ltd.

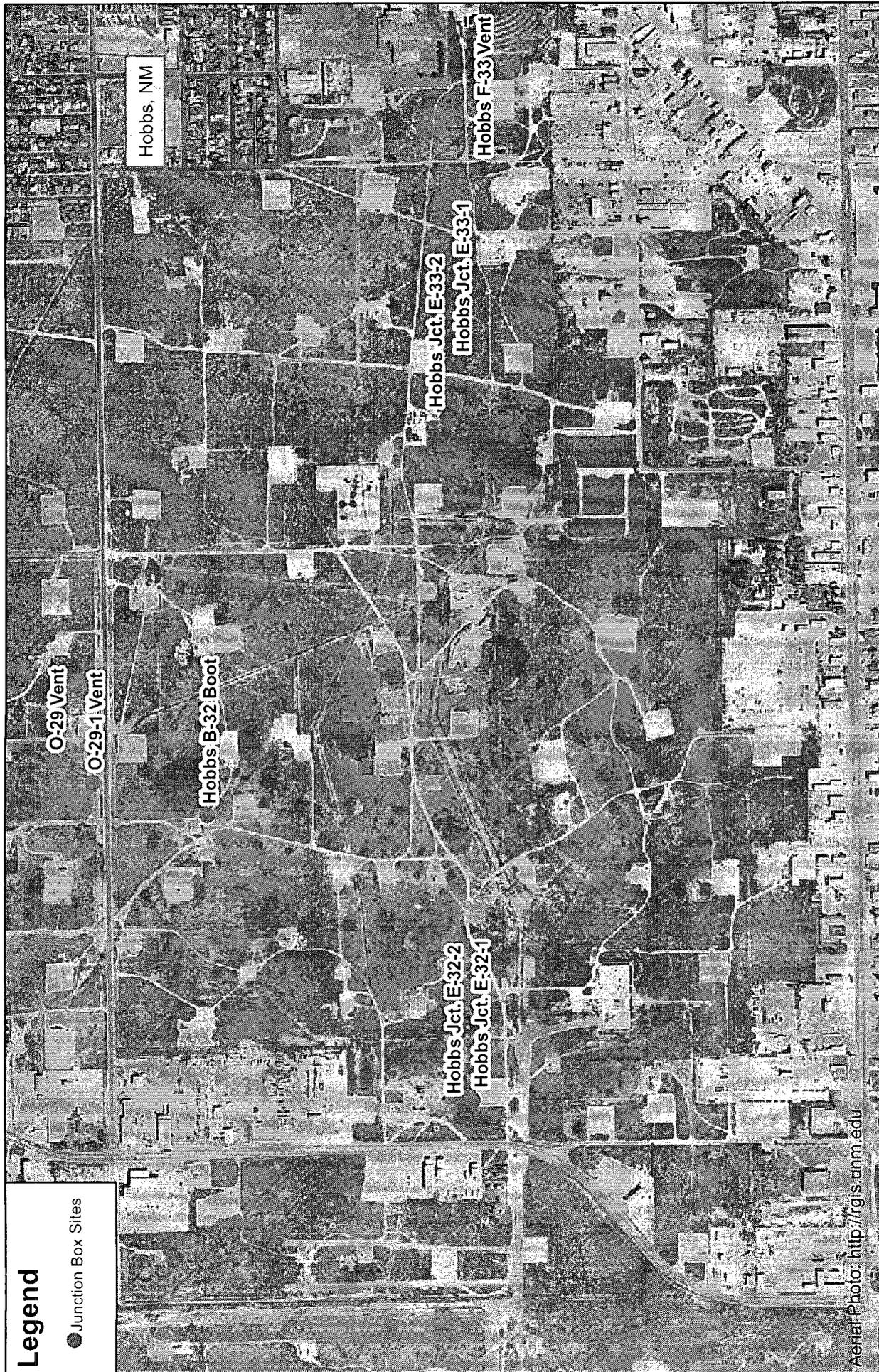


Gilbert Van Deventer
Project Manager

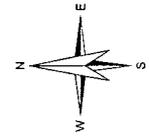
cc: Chris Williams, NMOCD Hobbs District Office
Carolyn Haynes, Rice Operating Company - Hobbs
Kristin Pope, Rice Operating Company - Hobbs
Randy Hicks, R. T. Hicks Consultants, Ltd. - Albuquerque

Legend

- Junction Box Sites



Aerial Photo: <http://rgis.unm.edu>



R.T. Hicks Consultants, Ltd 901 Rio Grande Blvd NW Suite F-142 Albuquerque, NM 87104 Ph: 505.266.5004	Junction Box Site Location Map	Plate 1
Rice Operating Company		December 2006

Rice Operating Company

QUALITY PROCEDURE - 03

Sampling and Testing Protocol - Chloride Titration Using .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 large 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 10 grams of reverse osmosis water to the soil sample and shake for 20 seconds.

4.3 Allow the sample to set for a period of 5 minutes or until the separation of soil and water.

4.4 Carefully pour the free liquid extract from the sample through a paper filter into a clean plastic cup if necessary.

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.

5.3 If the sample contains any sulfides (hydrogen or iron sulfides are common to oilfield soil samples) add 2-3 drops of hydrogen peroxide (H₂O₂) to mixture.

5.4 Using a 10 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.

5.5 Record the ml of silver nitrate used.

6.0 Calculation

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

$$\frac{0.282 \times 35,450 \times \text{ml AgNO}_3}{\text{ml water extract}} \times \frac{\text{grams of water in mixture}}{\text{grams of soil in mixture}}$$

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 Operating Company

QUALITY PROCEDURE -07 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° 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 an Environmental Instruments 13471 OVM / Datalogger or a similar pro-type instrument. (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 conduct BTEX Speciation in accordance with QP-O2 and QP-O6. If the reading is 100 ppm or less, NMOCD BTEX guideline has been met and no further testing for BTEX is necessary. File the Field Test Report Form in the project file.

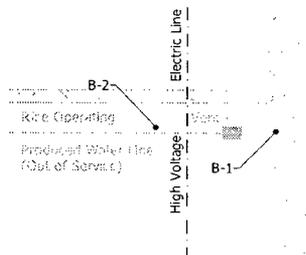
4.0 Clean-up

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

Appendix B

Results of Field Measurements

LITHOLOGIC LOG



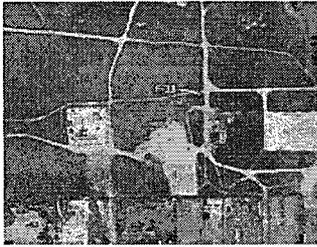
MONITOR WELL NO.: **B-1**
 SITE ID: **Hobbs F-33 Vent**
 CONTRACTOR: **Harrison & Cooper Drilling Inc.**
 DRILLING METHOD: **Air Rotary**
 START DATE: **07/20/06**
 COMPLETION DATE: **07/20/06**
 COMMENTS: **Located 22 ft east and 3 ft north of former vent location.**

TOTAL DEPTH: **51** Feet
 CLIENT: **RICE Operating Company**
 COUNTY: **Lea**
 STATE: **New Mexico**
 LOCATION: **T185-R38E-Sec 33-Unit F**
 FIELD REP.: **G. Van Deventer / M. Franks**

Presence of high voltage powerline prevented safe drilling directly above vent location.

USCS	Sample			Recovery (inches)	Chloride (ppm)	PID (ppm)	LITHOLOGIC DESCRIPTION: LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
	Depth	Time	Type				
SM/CAL	5	0900	Split Spoon	24"	178	0	Calcic very fine and fine-grained sand. Sand component is grayish orange (10 YR 7/4), fine-grained, subangular, moderately well sorted, dry. Calcic matrix is very pale orange (10 YR 8/2).
	10	0903	Split Spoon	24"	144	0	Calcic very fine and fine-grained sand. Sand component is grayish orange (10 YR 7/4), fine-grained, subangular, moderately well sorted, dry. Calcic matrix is very pale orange (10 YR 8/2).
	15	0906	Split Spoon	12"	282	0	Calcic very fine and fine-grained sand. Sand component is grayish orange (10 YR 7/4), fine-grained, subangular, moderately well sorted, dry. Calcic matrix is very pale orange (10 YR 8/2).
	20	0912	Split Spoon	4"	410	0	Calcic very fine and fine-grained sand. Sand component is grayish orange (10 YR 7/4), fine-grained, subangular, moderately well sorted, dry. Calcic matrix is very pale orange (10 YR 8/2). <u>Much harder</u>
	20	0916	Split Spoon	4"	410	0	Calcic very fine and fine-grained sand. Sand component is grayish orange (10 YR 7/4), fine-grained, subangular, moderately well sorted, dry. Calcic matrix is very pale orange (10 YR 8/2). <u>Much harder</u>
	25	0928	Split Spoon	0.5"	313	0	Calcic very fine and fine-grained sand. Sand component is grayish orange (10 YR 7/4), fine-grained, subangular, moderately well sorted, dry. Calcic matrix is very pale orange (10 YR 8/2). <u>Very hard</u>
	30	0930	Cuttings	NA	223	0	Calcic very fine and fine-grained sand. Sand component is grayish orange (10 YR 7/4), fine-grained, subangular, moderately well sorted, dry. Calcic matrix is very pale orange (10 YR 8/2). <u>Very hard</u>
	35	0933	Cuttings	NA	119	0	Calcic very fine and fine-grained sand. Sand component is grayish orange (10 YR 7/4), fine-grained, subangular, moderately well sorted, dry. Calcic matrix is very pale orange (10 YR 8/2). <u>Very hard</u>
	40	0940	Split Spoon	1"	89	0	Calcic very fine and fine-grained sand. Sand component is grayish orange (10 YR 7/4), fine-grained, subangular, moderately well sorted, dry. Calcic matrix is very pale orange (10 YR 8/2). <u>Very hard</u>
	45	0945	Cuttings	NA	89	0	Calcic very fine and fine-grained sand. Sand component is grayish orange (10 YR 7/4), fine-grained, subangular, moderately well sorted, dry. Calcic matrix is very pale orange (10 YR 8/2). <u>Very hard</u>
SW	50	0955	Split Spoon	12"		0	Light brown sand (5 YR 6/4) and grayish orange (10 YR 7/4) fine sand, subrounded, moderately well sorted.
	55						Bottom of boring at 52 feet below ground surface.
	60						

LITHOLOGIC LOG



MONITOR WELL NO.: B-2
 SITE ID: Hobbs F-33 Vent
 CONTRACTOR: Harrison & Cooper Drilling Inc.
 DRILLING METHOD: Air Rotary
 START DATE: 07/20/06
 COMPLETION DATE: 07/20/06

TOTAL DEPTH: 40 Feet
 CLIENT: RICE Operating Company
 COUNTY: Lea
 STATE: New Mexico
 LOCATION: T18S-R38E-Sec 33-Unit F
 FIELD REP.: G. Van Deventer / M. Franks

COMMENTS: Located 30 ft west of former vent location.
Presence of high voltage powerline prevented safe drilling directly above vent location.

USCS	Sample			Recovery (inches)	Chloride (ppm)	PID (ppm)	LITHOLOGIC DESCRIPTION: LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
	Depth	Time	Type				
CAL							Caliche
SM/CAL	5	1030	Split Spoon	24"	144	0	Calcic very fine and fine-grained sand. Moderately hard to hard. Sand component is grayish orange (10 YR 7/4), fine-grained, subangular, moderately well sorted, dry. Calcic matrix is very pale orange (10 YR 8/2).
	10	1032	Split Spoon	24"	113	0	Calcic very fine and fine-grained sand. Moderately hard to hard. Sand component is grayish orange (10 YR 7/4), fine-grained, subangular, moderately well sorted, dry. Calcic matrix is very pale orange (10 YR 8/2).
	15	1035	Split Spoon	24"	86	0	Calcic very fine and fine-grained sand. Moderately hard to hard. Sand component is grayish orange (10 YR 7/4), fine-grained, subangular, moderately well sorted, dry. Calcic matrix is very pale orange (10 YR 8/2).
	20	1038	Split Spoon	12"	60	0	Calcic very fine and fine-grained sand. Moderately hard to hard. Sand component is grayish orange (10 YR 7/4), fine-grained, subangular, moderately well sorted, dry. Calcic matrix is very pale orange (10 YR 8/2).
SW/SM	25	1051	Cuttings	NA	58	0	Very fine and fine-grained sand with less calcium carbonate. Light brown (5YR 6/4), subrounded, moderately sorted.
	30	1053	Cuttings	NA	60	0	Calcic very fine and fine-grained sand. Sand component is grayish orange (10 YR 7/4), fine-grained, subangular, moderately well sorted, dry. Calcic matrix is very pale orange (10 YR 8/2).
SM/CAL	35	1057	Cuttings	NA	57	0	Calcic very fine and fine-grained sand. Sand component is grayish orange (10 YR 7/4), fine-grained, subangular, moderately well sorted, dry. Calcic matrix is very pale orange (10 YR 8/2).
	40	1100	Split Spoon			0	Calcic very fine and fine-grained sand. Sand component is grayish orange (10 YR 7/4), fine-grained, subangular, moderately well sorted, dry. Calcic matrix is very pale orange (10 YR 8/2).
							Bottom of boring at 40 feet below ground surface.
	45						
	50						
	55						
	60						

MAP LEGEND

- Soil Sample Location

COC - Constituent of Concern

- B - Benzene
- T - Toluene
- E - Ethylbenzene
- X - Xylenes
- N - Naphthalene

Concentrations listed in mg/kg

10' North of Vent

COC	Sample Depth	
	8' bgs	12' bgs
B	<0.025	<0.025
T	<0.025	<0.025
E	0.094	0.073
X	0.590	0.293
N	0.103	0.202

10' East of Vent

COC	Sample Depth	
	4' bgs	12' bgs
B	<0.025	<0.025
T	<0.025	<0.025
E	0.513	0.516
X	0.429	<0.025
N	0.200	0.495

Former F-33 Vent

Rice Operating Produced Water Line
(Out of Service)

10' West of Vent

COC	Sample Depth	
	12' bgs	
B	<0.025	
T	<0.025	
E	0.117	
X	0.058	
N	0.091	

Vent

COC	Sample Depth	
	12' bgs	16' bgs
B	<0.025	<0.025
T	<0.025	<0.025
E	37.7	27.7
X	65.3	0.3
N	45.0	3.8



0' 10'
Approximate Scale (Feet)

Site: F-33 Vent Site

Date: May 22, 2006

Sampled By: Rice Operating Company

Approximate Scale: 1 inch = 10 feet

SITE MAP

HYDROCARBON SAMPLING RESULTS

R. T. HICKS CONSULTANTS, LTD.

P. O. Box 7624, Midland TX 79708

Appendix C Analytical Reports

Summary Table

Sample Location: Source

Analysis	Analytical Method	Compounds	Sample Depth	
			12' bgs	16' bgs
BTEX	8021B	Benzene	<0.025	<0.025
		Toluene	<0.025	<0.025
		Ethylbenzene	37.7	27.7
		Xylene	65.3	0.3
		Naphthalene	45.0	3.8
		Total BTEXN	148	32
TPH	8015M	GRO	2250	1120
		DRO	10470	11300
		Total TPH	12720	12420
Aliphatics	TX1006	>C6-C8	50.8	<10
		>C8-C10	421	110
		>C10-C12	892	345
		>C12-C16	2460	1540
		>C16-C21	2300	1830
		>C21-C35	1690	1440
Aromatics	TX1006	>C6-C8	6.44	5.77
		>C8-C10	69.5	46.7
		>C10-C12	290	146
		>C12-C16	1340	769
		>C16-C21	1760	1340
		>C21-C35	1670	1390

Sample Location: 10 Feet East of Source

Analysis	Analytical Method	Compounds	Sample Depth	
			4' bgs	12' bgs
BTEX	8021B	Benzene	<0.025	<0.025
		Toluene	<0.025	<0.025
		Ethylbenzene	0.513	0.516
		Xylene	0.429	<0.025
		Naphthalene	0.200	0.495
		Total BTEXN	1.142	1.011
TPH	8015M	GRO	596	25
		DRO	10480	1180
		Total TPH	11076	1205
Aliphatics	TX1006	>C6-C8	<10	---
		>C8-C10	45.4	---
		>C10-C12	383	---
		>C12-C16	1800	---
		>C16-C21	2300	---
		>C21-C35	2660	---
Aromatics	TX1006	>C6-C8	5.79	---
		>C8-C10	45.8	---
		>C10-C12	55.7	---
		>C12-C16	669	---
		>C16-C21	1850	---
		>C21-C35	2880	---

Sample Location: 10 Feet North of Source

Analysis	Analytical Method	Compounds	Sample Depth	
			8' bgs	12' bgs
BTEX	8021B	Benzene	<0.025	<0.025
		Toluene	<0.025	<0.025
		Ethylbenzene	0.094	0.073
		Xylene	0.590	0.293
		Naphthalene	0.103	0.202
		Total BTEXN	0.787	0.568
TPH	8015M	GRO	1540	1450
		DRO	7462	7535
		Total TPH	9002	8985
Aliphatics	TX1006	>C6-C8	<10	<10
		>C8-C10	268	126
		>C10-C12	941	611
		>C12-C16	2650	1840
		>C16-C21	2470	1710
		>C21-C35	1840	1210
Aromatics	TX1006	>C6-C8	5.13	4.16
		>C8-C10	62.1	49.2
		>C10-C12	302	229
		>C12-C16	1070	882
		>C16-C21	1520	1120
		>C21-C35	1230	984

Sample Location: 10 Feet West of Source

Analysis	Analytical Method	Compounds	Sample Depth
			12' bgs
BTEX	8021B	Benzene	<0.025
		Toluene	<0.025
		Ethylbenzene	0.117
		Xylene	0.058
		Naphthalene	0.091
		Total BTEXN	0.267
TPH	8015M	GRO	877
		DRO	7353
		Total	8230
Aliphatics	TX1006	>C6-C8	---
		>C8-C10	---
		>C10-C12	---
		>C12-C16	---
		>C16-C21	---
		>C21-C35	---
Aromatics	TX1006	>C6-C8	---
		>C8-C10	---
		>C10-C12	---
		>C12-C16	---
		>C16-C21	---
		>C21-C35	---

All concentrations listed in units of milligrams per kilogram (mg/kg)



TRACE ANALYSIS, INC.

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 155 McCutcheon, Suite H El Paso, Texas 79932 888•588•3443 915•585•3443 FAX 915•585•4944
 E-Mail lab@traceanalysis.com

Analytical and Quality Control Report

Kristen Farris-Pope
 Rice Operating Company
 122 W Taylor Street
 Hobbs, NM, 88240

Report Date: August 1, 2006

Work Order: 6072111



Project Location: Sec 33/F T185 R 38E, Hobbs, NM
 Project Name: Hobbs F-33 Vent
 Project Number: Hobbs F-33 Vent

Enclosed are the Analytical Report and Quality Control Report for the following sample(s) submitted to TraceAnalysis, Inc.

Sample	Description	Matrix	Date Taken	Time Taken	Date Received
96002	B-1 (20'-22')	soil	2006-07-20	09:16	2006-07-20

These results represent only the samples received in the laboratory. The Quality Control Report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

This report consists of a total of 4 pages and shall not be reproduced except in its entirety, without written approval of TraceAnalysis, Inc.

Michael Abel

Dr. Blair Leftwich, Director

Analytical Report

Sample: 96002 - B-1 (20'-22')

Analysis: Chloride (IC)	Analytical Method: E 300.0	Prep Method: N/A
QC Batch: 28528 ^a	Date Analyzed: 2006-07-30	Analyzed By: WB
Prep Batch: 24944	Sample Preparation: 2006-07-29	Prepared By: WB

^aMatrix spike not reported %IA is 105 and RPD is 1.

Parameter	Flag	RL Result	Units	Dilution	RL
Chloride		280	mg/Kg	10	1.00

Matrix Blank (1) QC Batch: 28528

QC Batch: 28528	Date Analyzed: 2006-07-30	Analyzed By: WB
Prep Batch: 24944	QC Preparation: 2006-07-29	Prepared By: WB

Parameter	Flag	MDL Result	Units	RL
Chloride		<0.0222	mg/Kg	1

Laboratory Control Spike (LCS-1)

QC Batch: 28528	Date Analyzed: 2006-07-30	Analyzed By: WB
Prep Batch: 24944	QC Preparation: 2006-07-29	Prepared By: WB

Param	LCS Result	LCSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	RPD	Rec. Limit	RPD Limit
Chloride	13.2	13.3	mg/Kg	1	12.5	<0.0222	106	0	90 - 110	20

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Standard (ICV-1)

QC Batch: 28528	Date Analyzed: 2006-07-30	Analyzed By: WB
-----------------	---------------------------	-----------------

Param	Flag	Units	ICVs True Conc.	ICVs Found Conc.	ICVs Percent Recovery	Percent Recovery Limits	Date Analyzed
Chloride		mg/Kg	12.5	12.1	97	90 - 110	2006-07-30

Standard (CCV-1)

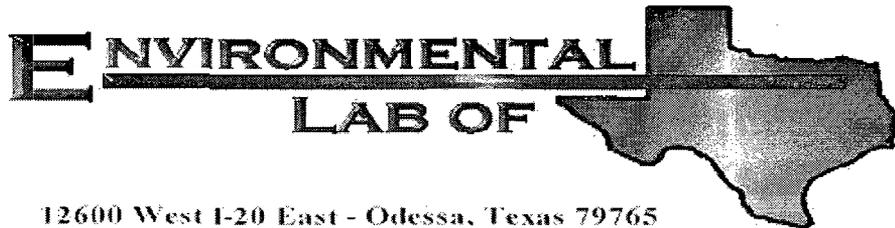
QC Batch: 28528	Date Analyzed: 2006-07-30	Analyzed By: WB
-----------------	---------------------------	-----------------

Report Date: August 1, 2006
Hobbs F-33 Vent

Work Order: 6072111
Hobbs F-33 Vent

Page Number: 3 of 4
Sec 33/F T185 R 38E,Hobbs,NM

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
Chloride		mg/Kg	12.5	12.0	96	90 - 110	2006-07-30



12600 West I-20 East - Odessa, Texas 79765

Analytical Report

Prepared for:

Kristin Farris-Pope

Rice Operating Co.

122 W. Taylor

Hobbs, NM 88240

Project: F-33 Vent (UN0080)

Project Number: Hobbs Abandonment

Location: T18S, R38E, Sec. 33, Unit Letter F

Lab Order Number: 6E25001

Report Date: 06/07/06

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: F-33 Vent (UN0080)
Project Number: Hobbs Abandonment
Project Manager: Kristin Farris-Pope

Fax: (505) 397-1471

Reported:
06/07/06 10:45

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Source 12'	6E25001-01	Soil	05/22/06 10:30	05/25/06 08:00
Source 16'	6E25001-02	Soil	05/22/06 11:10	05/25/06 08:00
10' east 4'	6E25001-03	Soil	05/22/06 11:55	05/25/06 08:00
10' east 12'	6E25001-04	Soil	05/22/06 14:04	05/25/06 08:00
10' north 8'	6E25001-05	Soil	05/22/06 14:10	05/25/06 08:00
10' north 12'	6E25001-06	Soil	05/22/06 14:25	05/25/06 08:00
10' west 12'	6E25001-07	Soil	05/22/06 14:50	05/25/06 08:00

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: F-33 Vent (UN0080)
Project Number: Hobbs Abandonment
Project Manager: Kristin Farris-Pope

Fax: (505) 397-1471
Reported:
06/07/06 10:45

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Source 12' (6E25001-01) Soil									
Carbon Ranges C6-C12	2250	20.0	mg/kg dry	2	EF60219	06/02/06	06/05/06	EPA 8015M	
Carbon Ranges C12-C28	9470	20.0	"	"	"	"	"	"	
Carbon Ranges C28-C35	1000	20.0	"	"	"	"	"	"	
Total Hydrocarbon nC6-nC35	12700	20.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		67.4 %		70-130	"	"	"	"	S-06
Surrogate: 1-Chlorooctadecane		59.6 %		70-130	"	"	"	"	S-06
Source 16' (6E25001-02) Soil									
Carbon Ranges C6-C12	1120	20.0	mg/kg dry	2	EF60219	06/02/06	06/05/06	EPA 8015M	
Carbon Ranges C12-C28	9970	20.0	"	"	"	"	"	"	
Carbon Ranges C28-C35	1330	20.0	"	"	"	"	"	"	
Total Hydrocarbon nC6-nC35	12400	20.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		58.4 %		70-130	"	"	"	"	S-06
Surrogate: 1-Chlorooctadecane		58.2 %		70-130	"	"	"	"	S-06
10' east 4' (6E25001-03) Soil									
Carbon Ranges C6-C12	596	20.0	mg/kg dry	2	EF60219	06/02/06	06/05/06	EPA 8015M	
Carbon Ranges C12-C28	8900	20.0	"	"	"	"	"	"	
Carbon Ranges C28-C35	1580	20.0	"	"	"	"	"	"	
Total Hydrocarbon nC6-nC35	11100	20.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		52.8 %		70-130	"	"	"	"	S-06
Surrogate: 1-Chlorooctadecane		54.2 %		70-130	"	"	"	"	S-06
10' east 12' (6E25001-04) Soil									
Carbon Ranges C6-C12	24.8	20.0	mg/kg dry	2	EE62507	05/25/06	05/26/06	EPA 8015M	
Carbon Ranges C12-C28	978	20.0	"	"	"	"	"	"	
Carbon Ranges C28-C35	202	20.0	"	"	"	"	"	"	
Total Hydrocarbon nC6-nC35	1200	20.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		52.6 %		70-130	"	"	"	"	S-06
Surrogate: 1-Chlorooctadecane		55.2 %		70-130	"	"	"	"	S-06

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: F-33 Vent (UN0080)
Project Number: Hobbs Abandonment
Project Manager: Kristin Farris-Pope

Fax: (505) 397-1471
Reported:
06/07/06 10:45

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
10' north 8' (6E25001-05) Soil									
Carbon Ranges C6-C12	1540	20.0	mg/kg dry	2	EF60219	06/02/06	06/05/06	EPA 8015M	
Carbon Ranges C12-C28	6860	20.0	"	"	"	"	"	"	
Carbon Ranges C28-C35	602	20.0	"	"	"	"	"	"	
Total Hydrocarbon nC6-nC35	9000	20.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		69.6 %		70-130	"	"	"	"	S-06
Surrogate: 1-Chlorooctadecane		68.2 %		70-130	"	"	"	"	S-06
10' north 12' (6E25001-06) Soil									
Carbon Ranges C6-C12	1450	20.0	mg/kg dry	2	EF60219	06/02/06	06/05/06	EPA 8015M	
Carbon Ranges C12-C28	6910	20.0	"	"	"	"	"	"	
Carbon Ranges C28-C35	625	20.0	"	"	"	"	"	"	
Total Hydrocarbon nC6-nC35	8980	20.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		66.8 %		70-130	"	"	"	"	S-06
Surrogate: 1-Chlorooctadecane		69.8 %		70-130	"	"	"	"	S-06
10' west 12' (6E25001-07) Soil									
Carbon Ranges C6-C12	877	20.0	mg/kg dry	2	EE62507	05/25/06	05/28/06	EPA 8015M	
Carbon Ranges C12-C28	6750	20.0	"	"	"	"	"	"	
Carbon Ranges C28-C35	603	20.0	"	"	"	"	"	"	
Total Hydrocarbon nC6-nC35	8230	20.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		57.4 %		70-130	"	"	"	"	S-06
Surrogate: 1-Chlorooctadecane		59.4 %		70-130	"	"	"	"	S-06

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: F-33 Vent (UN0080)
Project Number: Hobbs Abandonment
Project Manager: Kristin Farris-Pope

Fax: (505) 397-1471
Reported:
06/07/06 10:45

**Fractionation of Aliphatics by TNRCC Method 1006
Environmental Lab of Texas**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Source 12' (6E25001-01) Soil									
C6-C8	50.8	10.0	mg/kg dry	1	EF60608	06/02/06	06/06/06	TX 1006	
>C8-C10	421	10.0	"	"	"	"	"	"	
>C10-C12	892	10.0	"	"	"	"	"	"	
>C12-C16	2460	10.0	"	"	"	"	"	"	
>C16-C21	2300	10.0	"	"	"	"	"	"	
>C21-C35	1690	10.0	"	"	"	"	"	"	
Total Hydrocarbon nC6-nC35	7810	10.0	"	"	"	"	"	"	
Source 16' (6E25001-02) Soil									
C6-C8	ND	10.0	mg/kg dry	1	EF60608	06/02/06	06/06/06	TX 1006	
>C8-C10	110	10.0	"	"	"	"	"	"	
>C10-C12	345	10.0	"	"	"	"	"	"	
>C12-C16	1540	10.0	"	"	"	"	"	"	
>C16-C21	1830	10.0	"	"	"	"	"	"	
>C21-C35	1440	10.0	"	"	"	"	"	"	
Total Hydrocarbon nC6-nC35	5260	10.0	"	"	"	"	"	"	
10' east 4' (6E25001-03) Soil									
C6-C8	ND	10.0	mg/kg dry	1	EF60608	06/02/06	06/06/06	TX 1006	
>C8-C10	45.4	10.0	"	"	"	"	"	"	
>C10-C12	383	10.0	"	"	"	"	"	"	
>C12-C16	1800	10.0	"	"	"	"	"	"	
>C16-C21	2300	10.0	"	"	"	"	"	"	
>C21-C35	2660	10.0	"	"	"	"	"	"	
Total Hydrocarbon nC6-nC35	7190	10.0	"	"	"	"	"	"	
10' north 8' (6E25001-05) Soil									
C6-C8	ND	10.0	mg/kg dry	1	EF60608	06/02/06	06/06/06	TX 1006	
>C8-C10	268	10.0	"	"	"	"	"	"	
>C10-C12	941	10.0	"	"	"	"	"	"	
>C12-C16	2650	10.0	"	"	"	"	"	"	
>C16-C21	2470	10.0	"	"	"	"	"	"	
>C21-C35	1840	10.0	"	"	"	"	"	"	
Total Hydrocarbon nC6-nC35	8170	10.0	"	"	"	"	"	"	

Environmental Lab of Texas

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Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: F-33 Vent (UN0080)
Project Number: Hobbs Abandonment
Project Manager: Kristin Farris-Pope

Fax: (505) 397-1471

Reported:
06/07/06 10:45

Fractionation of Aliphatics by TNRCC Method 1006
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
10' north 12' (6E25001-06) Soil									
C6-C8	ND	10.0	mg/kg dry	1	EF60608	06/02/06	06/06/06	TX 1006	
>C8-C10	126	10.0	"	"	"	"	"	"	
>C10-C12	611	10.0	"	"	"	"	"	"	
>C12-C16	1840	10.0	"	"	"	"	"	"	
>C16-C21	1710	10.0	"	"	"	"	"	"	
>C21-C35	1210	10.0	"	"	"	"	"	"	
Total Hydrocarbon nC6-nC35	5500	10.0	"	"	"	"	"	"	

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: F-33 Vent (UN0080)
Project Number: Hobbs Abandonment
Project Manager: Kristin Farris-Pope

Fax: (505) 397-1471

Reported:
06/07/06 10:45

Fractionation of Aromatics by TNRCC Method 1006
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Source 12' (6E25001-01) Soil									
C7-C8	J [6.44]	10.0	mg/kg dry	1	EF60608	06/02/06	06/06/06	TX 1006	J
>C8-C10	69.5	10.0	"	"	"	"	"	"	
>C10-C12	290	10.0	"	"	"	"	"	"	
>C12-C16	1340	10.0	"	"	"	"	"	"	
>C16-C21	1760	10.0	"	"	"	"	"	"	
>C21-C35	1670	10.0	"	"	"	"	"	"	
Total Hydrocarbon nC6-nC35	5130	10.0	"	"	"	"	"	"	
Source 16' (6E25001-02) Soil									
C7-C8	J [5.77]	10.0	mg/kg dry	1	EF60608	06/02/06	06/06/06	TX 1006	J
>C8-C10	46.7	10.0	"	"	"	"	"	"	
>C10-C12	146	10.0	"	"	"	"	"	"	
>C12-C16	769	10.0	"	"	"	"	"	"	
>C16-C21	1340	10.0	"	"	"	"	"	"	
>C21-C35	1390	10.0	"	"	"	"	"	"	
Total Hydrocarbon nC6-nC35	3690	10.0	"	"	"	"	"	"	
10' east 4' (6E25001-03) Soil									
C7-C8	J [5.79]	10.0	mg/kg dry	1	EF60608	06/02/06	06/06/06	TX 1006	J
>C8-C10	45.8	10.0	"	"	"	"	"	"	
>C10-C12	55.7	10.0	"	"	"	"	"	"	
>C12-C16	669	10.0	"	"	"	"	"	"	
>C16-C21	1850	10.0	"	"	"	"	"	"	
>C21-C35	2880	10.0	"	"	"	"	"	"	
Total Hydrocarbon nC6-nC35	5500	10.0	"	"	"	"	"	"	
10' north 8' (6E25001-05) Soil									
C7-C8	J [5.13]	10.0	mg/kg dry	1	EF60608	06/02/06	06/06/06	TX 1006	J
>C8-C10	62.1	10.0	"	"	"	"	"	"	
>C10-C12	302	10.0	"	"	"	"	"	"	
>C12-C16	1070	10.0	"	"	"	"	"	"	
>C16-C21	1520	10.0	"	"	"	"	"	"	
>C21-C35	1230	10.0	"	"	"	"	"	"	
Total Hydrocarbon nC6-nC35	4180	10.0	"	"	"	"	"	"	

Environmental Lab of Texas

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Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: F-33 Vent (UN0080)
Project Number: Hobbs Abandonment
Project Manager: Kristin Farris-Pope

Fax: (505) 397-1471

Reported:
06/07/06 10:45

Fractionation of Aromatics by TNRCC Method 1006
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
10' north 12' (6E25001-06) Soil									
C7-C8	J [4.16]	10.0	mg/kg dry	1	EF60608	06/02/06	06/06/06	TX 1006	J
>C8-C10	49.2	10.0	"	"	"	"	"	"	
>C10-C12	229	10.0	"	"	"	"	"	"	
>C12-C16	882	10.0	"	"	"	"	"	"	
>C16-C21	1120	10.0	"	"	"	"	"	"	
>C21-C35	984	10.0	"	"	"	"	"	"	
Total Hydrocarbon nC6-nC35	3260	10.0	"	"	"	"	"	"	

Rice Operating Co.
 122 W. Taylor
 Hobbs NM, 88240

Project: F-33 Vent (UN0080)
 Project Number: Hobbs Abandonment
 Project Manager: Kristin Farris-Pope

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Reported:
 06/07/06 10:45

**General Chemistry Parameters by EPA / Standard Methods
 Environmental Lab of Texas**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Source 12' (6E25001-01) Soil									
% Moisture	11.1	0.1	%	1	EE62607	05/25/06	05/26/06	% calculation	
Source 16' (6E25001-02) Soil									
Chloride	143	10.0	mg/kg	20	EE63005	05/29/06	05/29/06	EPA 300.0	
% Moisture	14.0	0.1	%	1	EE62607	05/25/06	05/26/06	% calculation	
10' east 4' (6E25001-03) Soil									
Chloride	341	10.0	mg/kg	20	EE63005	05/29/06	05/29/06	EPA 300.0	
% Moisture	9.8	0.1	%	1	EE62607	05/25/06	05/26/06	% calculation	
10' east 12' (6E25001-04) Soil									
% Moisture	8.7	0.1	%	1	EE62607	05/25/06	05/26/06	% calculation	
10' north 8' (6E25001-05) Soil									
% Moisture	4.3	0.1	%	1	EE62607	05/25/06	05/26/06	% calculation	
10' north 12' (6E25001-06) Soil									
% Moisture	3.7	0.1	%	1	EE62607	05/25/06	05/26/06	% calculation	
10' west 12' (6E25001-07) Soil									
% Moisture	4.6	0.1	%	1	EE62607	05/25/06	05/26/06	% calculation	

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: F-33 Vent (UN0080)
Project Number: Hobbs Abandonment
Project Manager: Kristin Farris-Pope

Fax: (505) 397-1471
Reported:
06/07/06 10:45

Volatile Organic Compounds by EPA Method 8260B
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Source 12' (6E25001-01) Soil									
Benzene	ND	50.0	ug/kg dry	50	EE62606	05/26/06	05/31/06	EPA 8260B	
Toluene	ND	50.0	"	"	"	"	"	"	
Ethylbenzene	3770	50.0	"	"	"	"	"	"	
Xylene (p/m)	171	50.0	"	"	"	"	"	"	
Xylene (o)	J [48.2]	50.0	"	"	"	"	"	"	J
Naphthalene	4500	50.0	"	"	"	"	"	"	
<i>Surrogate: Dibromofluoromethane</i>		107 %	70-139	"	"	"	"	"	
<i>Surrogate: 1,2-Dichloroethane-d4</i>		87.6 %	52-149	"	"	"	"	"	
<i>Surrogate: Toluene-d8</i>		84.2 %	76-125	"	"	"	"	"	
<i>Surrogate: 4-Bromofluorobenzene</i>		87.6 %	66-145	"	"	"	"	"	
Source 16' (6E25001-02) Soil									
Benzene	ND	25.0	ug/kg dry	25	EE62606	05/26/06	05/31/06	EPA 8260B	
Toluene	ND	25.0	"	"	"	"	"	"	
Ethylbenzene	277	25.0	"	"	"	"	"	"	
Xylene (p/m)	28.2	25.0	"	"	"	"	"	"	
Xylene (o)	ND	25.0	"	"	"	"	"	"	
Naphthalene	378	25.0	"	"	"	"	"	"	
<i>Surrogate: Dibromofluoromethane</i>		100 %	70-139	"	"	"	"	"	
<i>Surrogate: 1,2-Dichloroethane-d4</i>		79.2 %	52-149	"	"	"	"	"	
<i>Surrogate: Toluene-d8</i>		83.2 %	76-125	"	"	"	"	"	
<i>Surrogate: 4-Bromofluorobenzene</i>		100 %	66-145	"	"	"	"	"	
10' east 4' (6E25001-03) Soil									
Benzene	ND	25.0	ug/kg dry	25	EE62606	05/26/06	05/31/06	EPA 8260B	
Toluene	ND	25.0	"	"	"	"	"	"	
Ethylbenzene	51.3	25.0	"	"	"	"	"	"	
Xylene (p/m)	J [24.1]	25.0	"	"	"	"	"	"	J
Xylene (o)	J [18.8]	25.0	"	"	"	"	"	"	J
Naphthalene	200	25.0	"	"	"	"	"	"	
<i>Surrogate: Dibromofluoromethane</i>		104 %	70-139	"	"	"	"	"	
<i>Surrogate: 1,2-Dichloroethane-d4</i>		86.2 %	52-149	"	"	"	"	"	
<i>Surrogate: Toluene-d8</i>		87.6 %	76-125	"	"	"	"	"	
<i>Surrogate: 4-Bromofluorobenzene</i>		94.4 %	66-145	"	"	"	"	"	

Environmental Lab of Texas

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122 W. Taylor
Hobbs NM, 88240

Project: F-33 Vent (UN0080)
Project Number: Hobbs Abandonment
Project Manager: Kristin Farris-Pope

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Volatile Organic Compounds by EPA Method 8260B
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
10' east 12' (6E25001-04) Soil									
Benzene	ND	25.0	ug/kg dry	25	EE62606	05/26/06	05/31/06	EPA 8260B	
Toluene	ND	25.0	"	"	"	"	"	"	
Ethylbenzene	51.6	25.0	"	"	"	"	"	"	
Xylene (p/m)	ND	25.0	"	"	"	"	"	"	
Xylene (o)	ND	25.0	"	"	"	"	"	"	
Naphthalene	49.5	25.0	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		100 %	70-139		"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		81.6 %	52-149		"	"	"	"	
Surrogate: Toluene-d8		87.4 %	76-125		"	"	"	"	
Surrogate: 4-Bromofluorobenzene		82.6 %	66-145		"	"	"	"	
10' north 8' (6E25001-05) Soil									
Benzene	ND	25.0	ug/kg dry	25	EE62606	05/26/06	05/31/06	EPA 8260B	
Toluene	ND	25.0	"	"	"	"	"	"	
Ethylbenzene	93.8	25.0	"	"	"	"	"	"	
Xylene (p/m)	254	25.0	"	"	"	"	"	"	
Xylene (o)	336	25.0	"	"	"	"	"	"	
Naphthalene	103	25.0	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		98.0 %	70-139		"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		78.6 %	52-149		"	"	"	"	
Surrogate: Toluene-d8		82.6 %	76-125		"	"	"	"	
Surrogate: 4-Bromofluorobenzene		123 %	66-145		"	"	"	"	
10' north 12' (6E25001-06) Soil									
Benzene	ND	25.0	ug/kg dry	25	EE62606	05/26/06	05/31/06	EPA 8260B	
Toluene	ND	25.0	"	"	"	"	"	"	
Ethylbenzene	72.8	25.0	"	"	"	"	"	"	
Xylene (p/m)	101	25.0	"	"	"	"	"	"	
Xylene (o)	192	25.0	"	"	"	"	"	"	
Naphthalene	202	25.0	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		101 %	70-139		"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		80.0 %	52-149		"	"	"	"	
Surrogate: Toluene-d8		84.4 %	76-125		"	"	"	"	
Surrogate: 4-Bromofluorobenzene		116 %	66-145		"	"	"	"	

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Project: F-33 Vent (UN0080)
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 Project Manager: Kristin Farris-Pope

Fax: (505) 397-1471

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Volatile Organic Compounds by EPA Method 8260B
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
10' west 12' (6E25001-07) Soil									
Benzene	ND	25.0	ug/kg dry	25	EE62606	05/26/06	05/31/06	EPA 8260B	
Toluene	ND	25.0	"	"	"	"	"	"	
Ethylbenzene	117	25.0	"	"	"	"	"	"	
Xylene (p/m)	25.1	25.0	"	"	"	"	"	"	
Xylene (o)	33.0	25.0	"	"	"	"	"	"	
Naphthalene	91.4	25.0	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		99.8 %		70-139	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		80.4 %		52-149	"	"	"	"	
Surrogate: Toluene-d8		86.2 %		76-125	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		102 %		66-145	"	"	"	"	

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**Organics by GC - Quality Control
Environmental Lab of Texas**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch EE62507 - Solvent Extraction (GC)

Blank (EE62507-BLK1)		Prepared: 05/25/06 Analyzed: 05/26/06								
Carbon Ranges C6-C12	ND	10.0	mg/kg wet							
Carbon Ranges C12-C28	ND	10.0	"							
Carbon Ranges C28-C35	ND	10.0	"							
Total Hydrocarbon nC6-nC35	ND	10.0	"							
Surrogate: 1-Chlorooctane	43.6		mg/kg	50.0		87.2	70-130			
Surrogate: 1-Chlorooctadecane	45.3		"	50.0		90.6	70-130			

LCS (EE62507-BS1)		Prepared: 05/25/06 Analyzed: 05/26/06								
Carbon Ranges C6-C12	546	10.0	mg/kg wet	500		109	75-125			
Carbon Ranges C12-C28	561	10.0	"	500		112	75-125			
Total Hydrocarbon nC6-nC35	1110	10.0	"	1000		111	75-125			
Surrogate: 1-Chlorooctane	57.6		mg/kg	50.0		115	70-130			
Surrogate: 1-Chlorooctadecane	49.2		"	50.0		98.4	70-130			

Calibration Check (EE62507-CCV1)		Prepared: 05/25/06 Analyzed: 05/30/06								
Carbon Ranges C6-C12	268		mg/kg	250		107	80-120			
Carbon Ranges C12-C28	286		"	250		114	80-120			
Total Hydrocarbon nC6-nC35	554		"	500		111	80-120			
Surrogate: 1-Chlorooctane	64.4		"	50.0		129	70-130			
Surrogate: 1-Chlorooctadecane	62.4		"	50.0		125	70-130			

Matrix Spike (EE62507-MS1)		Source: 6E24006-01	Prepared: 05/25/06 Analyzed: 05/26/06							
Carbon Ranges C6-C12	573	10.0	mg/kg dry	520	ND	110	75-125			
Carbon Ranges C12-C28	576	10.0	"	520	ND	111	75-125			
Total Hydrocarbon nC6-nC35	1150	10.0	"	1040	ND	111	75-125			
Surrogate: 1-Chlorooctane	55.5		mg/kg	50.0		111	70-130			
Surrogate: 1-Chlorooctadecane	50.2		"	50.0		100	70-130			

Rice Operating Co.
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Hobbs NM, 88240

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Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch EE62507 - Solvent Extraction (GC)

Matrix Spike Dup (EE62507-MSD1)

Source: 6E24006-01

Prepared: 05/25/06 Analyzed: 05/31/06

Carbon Ranges C6-C12	575	10.0	mg/kg dry	520	ND	111	75-125	0.348	20	
Carbon Ranges C12-C28	579	10.0	"	520	ND	111	75-125	0.519	20	
Total Hydrocarbon nC6-nC35	1150	10.0	"	1040	ND	111	75-125	0.00	20	
Surrogate: 1-Chlorooctane	56.1		mg/kg	50.0		112	70-130			
Surrogate: 1-Chlorooctadecane	49.8		"	50.0		99.6	70-130			

Batch EF60219 - Solvent Extraction (GC)

Blank (EF60219-BLK1)

Prepared: 06/02/06 Analyzed: 06/05/06

Carbon Ranges C6-C12	ND	10.0	mg/kg wet							
Carbon Ranges C12-C28	ND	10.0	"							
Carbon Ranges C28-C35	ND	10.0	"							
Total Hydrocarbon nC6-nC35	ND	10.0	"							
Surrogate: 1-Chlorooctane	45.4		mg/kg	50.0		90.8	70-130			
Surrogate: 1-Chlorooctadecane	46.5		"	50.0		93.0	70-130			

LCS (EF60219-BS1)

Prepared: 06/02/06 Analyzed: 06/05/06

Carbon Ranges C6-C12	567	10.0	mg/kg wet	500		113	75-125			
Carbon Ranges C12-C28	554	10.0	"	500		111	75-125			
Total Hydrocarbon nC6-nC35	1120	10.0	"	1000		112	75-125			
Surrogate: 1-Chlorooctane	58.5		mg/kg	50.0		117	70-130			
Surrogate: 1-Chlorooctadecane	52.7		"	50.0		105	70-130			

Calibration Check (EF60219-CCV1)

Prepared: 06/02/06 Analyzed: 06/05/06

Carbon Ranges C6-C12	290		mg/kg	250		116	80-120			
Carbon Ranges C12-C28	294		"	250		118	80-120			
Total Hydrocarbon nC6-nC35	584		"	500		117	80-120			
Surrogate: 1-Chlorooctane	57.9		"	50.0		116	70-130			
Surrogate: 1-Chlorooctadecane	58.2		"	50.0		116	70-130			

Environmental Lab of Texas

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Rice Operating Co. 122 W. Taylor Hobbs NM, 88240	Project: F-33 Vent (UN0080) Project Number: Hobbs Abandonment Project Manager: Kristin Farris-Pope	Fax: (505) 397-1471 Reported: 06/07/06 10:45
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Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch EF60219 - Solvent Extraction (GC)

Matrix Spike (EF60219-MS1)	Source: 6F02008-01			Prepared: 06/02/06		Analyzed: 06/05/06				
Carbon Ranges C6-C12	734	10.0	mg/kg dry	696	ND	105	75-125			
Carbon Ranges C12-C28	728	10.0	"	696	42.5	98.5	75-125			
Total Hydrocarbon nC6-nC35	1460	10.0	"	1390	42.5	102	75-125			
<i>Surrogate: 1-Chlorooctane</i>	55.6		mg/kg	50.0		111	70-130			
<i>Surrogate: 1-Chlorooctadecane</i>	47.3		"	50.0		94.6	70-130			
Matrix Spike Dup (EF60219-MSD1)	Source: 6F02008-01			Prepared: 06/02/06		Analyzed: 06/05/06				
Carbon Ranges C6-C12	724	10.0	mg/kg dry	696	ND	104	75-125	1.37	20	
Carbon Ranges C12-C28	734	10.0	"	696	42.5	99.4	75-125	0.821	20	
Total Hydrocarbon nC6-nC35	1460	10.0	"	1390	42.5	102	75-125	0.00	20	
<i>Surrogate: 1-Chlorooctane</i>	55.0		mg/kg	50.0		110	70-130			
<i>Surrogate: 1-Chlorooctadecane</i>	46.4		"	50.0		92.8	70-130			

Rice Operating Co.
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Hobbs NM, 88240

Project: F-33 Vent (UN0080)
Project Number: Hobbs Abandonment
Project Manager: Kristin Farris-Pope

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06/07/06 10:45

Fractionation of Aliphatics by TNRCC Method 1006 - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch EF60608 - Solvent Extraction (GC)

Blank (EF60608-BLK1)

Prepared: 06/02/06 Analyzed: 06/06/06

C6-C8	ND	10.0	mg/kg wet							
>C8-C10	ND	10.0	"							
>C10-C12	ND	10.0	"							
>C12-C16	ND	10.0	"							
>C16-C21	ND	10.0	"							
>C21-C35	ND	10.0	"							
Total Hydrocarbon nC6-nC35	ND	10.0	"							

LCS (EF60608-BS1)

Prepared: 06/02/06 Analyzed: 06/06/06

Total Hydrocarbon nC6-nC35	1730	10.0	mg/kg wet	2000		86.5	60-140			
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Calibration Check (EF60608-CCV1)

Prepared & Analyzed: 06/06/06

Total Hydrocarbon nC6-nC35	568		mg/kg	500		114	80-120			
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Duplicate (EF60608-DUP1)

Source: 6E25001-01

Prepared & Analyzed: 06/06/06

C6-C8	48.7	10.0	mg/kg dry		50.8			4.22	20	
>C8-C10	415	10.0	"		421			1.44	20	
>C10-C12	891	10.0	"		892			0.112	20	
>C12-C16	2500	10.0	"		2460			1.61	20	
>C16-C21	2340	10.0	"		2300			1.72	20	
>C21-C35	1730	10.0	"		1690			2.34	20	
Total Hydrocarbon nC6-nC35	7920	10.0	"		7810			1.40	20	

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

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Reported:
06/07/06 10:45

Fractionation of Aromatics by TNRCC Method 1006 - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch EF60608 - Solvent Extraction (GC)

Blank (EF60608-BLK1)

Prepared: 06/02/06 Analyzed: 06/06/06

C7-C8	ND	10.0	mg/kg wet							
>C8-C10	ND	10.0	"							
>C10-C12	ND	10.0	"							
>C12-C16	ND	10.0	"							
>C16-C21	ND	10.0	"							
>C21-C35	ND	10.0	"							
Total Hydrocarbon nC6-nC35	ND	10.0	"							

LCS (EF60608-BS1)

Prepared: 06/02/06 Analyzed: 06/06/06

Total Hydrocarbon nC6-nC35	1730	10.0	mg/kg wet	2000		86.5	60-140			
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Calibration Check (EF60608-CCV1)

Prepared & Analyzed: 06/06/06

Total Hydrocarbon nC6-nC35	568		mg/kg	500		114	80-120			
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Duplicate (EF60608-DUP1)

Source: 6E25001-01

Prepared & Analyzed: 06/06/06

C7-C8	6.25	10.0	mg/kg dry		6.44			2.99	20	J
>C8-C10	73.4	10.0	"		69.5			5.46	20	
>C10-C12	283	10.0	"		290			2.44	20	
>C12-C16	1360	10.0	"		1340			1.48	20	
>C16-C21	1790	10.0	"		1760			1.69	20	
>C21-C35	1680	10.0	"		1670			0.597	20	
Total Hydrocarbon nC6-nC35	5200	10.0	"		5130			1.36	20	

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General Chemistry Parameters by EPA / Standard Methods - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EE62607 - General Preparation (Prep)										
Blank (EE62607-BLK1) Prepared: 05/25/06 Analyzed: 05/26/06										
% Solids	100		%							
Duplicate (EE62607-DUP1) Source: 6E24016-01 Prepared: 05/25/06 Analyzed: 05/26/06										
% Solids	96.6		%		96.8			0.207	20	
Duplicate (EE62607-DUP2) Source: 6E24016-21 Prepared: 05/25/06 Analyzed: 05/26/06										
% Solids	99.6		%		99.9			0.301	20	
Duplicate (EE62607-DUP3) Source: 6E24016-41 Prepared: 05/25/06 Analyzed: 05/26/06										
% Solids	99.7		%		99.5			0.201	20	
Duplicate (EE62607-DUP4) Source: 6E25007-02 Prepared: 05/25/06 Analyzed: 05/26/06										
% Solids	90.8		%		89.7			1.22	20	
Batch EE63005 - Water Extraction										
Blank (EE63005-BLK1) Prepared & Analyzed: 05/29/06										
Chloride	ND	0.500	mg/kg							
LCS (EE63005-BS1) Prepared & Analyzed: 05/29/06										
Chloride	10.2	0.500	mg/kg	10.0		102	80-120			
Calibration Check (EE63005-CCV1) Prepared & Analyzed: 05/29/06										
Chloride	10.3		mg/L	10.0		103	80-120			
Duplicate (EE63005-DUP1) Source: 6E24016-41 Prepared & Analyzed: 05/29/06										
Chloride	12.2	5.00	mg/kg		12.8			4.80	20	

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 Hobbs NM, 88240

Project: F-33 Vent (UN0080)
 Project Number: Hobbs Abandonment
 Project Manager: Kristin Farris-Pope

Fax: (505) 397-1471

Reported:
 06/07/06 10:45

**General Chemistry Parameters by EPA / Standard Methods - Quality Control
 Environmental Lab of Texas**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch EE63005 - Water Extraction

Duplicate (EE63005-DUP2)		Source: 6E25008-02		Prepared & Analyzed: 05/29/06						
Chloride	181	20.0	mg/kg		179			1.11	20	
Matrix Spike (EE63005-MS1)		Source: 6E24016-41		Prepared & Analyzed: 05/29/06						
Chloride	102	5.00	mg/kg	100	12.8	89.2	80-120			
Matrix Spike (EE63005-MS2)		Source: 6E25008-02		Prepared & Analyzed: 05/29/06						
Chloride	571	20.0	mg/kg	400	179	98.0	80-120			

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: F-33 Vent (UN0080)
Project Number: Hobbs Abandonment
Project Manager: Kristin Farris-Pope

Fax: (505) 397-1471

Reported:
06/07/06 10:45

Volatile Organic Compounds by EPA Method 8260B - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch EE62606 - EPA 5030C (GCMS)

Blank (EE62606-BLK1)

Prepared & Analyzed: 05/26/06

Benzene	ND	25.0	ug/kg wet							
Toluene	ND	25.0	"							
Ethylbenzene	ND	25.0	"							
Xylene (p/m)	ND	25.0	"							
Xylene (o)	ND	25.0	"							
Naphthalene	ND	25.0	"							
<i>Surrogate: Dibromofluoromethane</i>	53.0		ug/l	50.0		106	70-139			
<i>Surrogate: 1,2-Dichloroethane-d4</i>	43.7		"	50.0		87.4	52-149			
<i>Surrogate: Toluene-d8</i>	41.3		"	50.0		82.6	76-125			
<i>Surrogate: 4-Bromofluorobenzene</i>	37.5		"	50.0		75.0	66-145			

LCS (EE62606-BS1)

Prepared & Analyzed: 05/26/06

Benzene	568	25.0	ug/kg wet	625		90.9	70-130			
Toluene	589	25.0	"	625		94.2	70-130			
Ethylbenzene	627	25.0	"	625		100	70-130			
Xylene (p/m)	1200	25.0	"	1250		96.0	70-130			
Xylene (o)	640	25.0	"	625		102	70-130			
Naphthalene	534	25.0	"	625		85.4	70-130			
<i>Surrogate: Dibromofluoromethane</i>	47.5		ug/l	50.0		95.0	70-139			
<i>Surrogate: 1,2-Dichloroethane-d4</i>	41.7		"	50.0		83.4	52-149			
<i>Surrogate: Toluene-d8</i>	42.8		"	50.0		85.6	76-125			
<i>Surrogate: 4-Bromofluorobenzene</i>	40.7		"	50.0		81.4	66-145			

Calibration Check (EE62606-CCV1)

Prepared & Analyzed: 05/26/06

Toluene	42.9		ug/l	50.0		85.8	70-130			
Ethylbenzene	40.5		"	50.0		81.0	70-130			
<i>Surrogate: Dibromofluoromethane</i>	50.6		"	50.0		101	70-139			
<i>Surrogate: 1,2-Dichloroethane-d4</i>	43.9		"	50.0		87.8	52-149			
<i>Surrogate: Toluene-d8</i>	45.7		"	50.0		91.4	76-125			
<i>Surrogate: 4-Bromofluorobenzene</i>	43.9		"	50.0		87.8	66-145			

Environmental Lab of Texas

The results in this report apply to the samples analyzed in accordance with the samples received in the laboratory. This analytical report must be reproduced in its entirety, with written approval of Environmental Lab of Texas.

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Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: F-33 Vent (UN0080)
Project Number: Hobbs Abandonment
Project Manager: Kristin Farris-Pope

Fax: (505) 397-1471

Reported:
06/07/06 10:45

**Volatile Organic Compounds by EPA Method 8260B - Quality Control
Environmental Lab of Texas**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
---------	--------	-----------------	-------	-------------	---------------	------	-------------	-----	-----------	-------

Batch EE62606 - EPA 5030C (GCMS)

Matrix Spike (EE62606-MS1)

Source: 6E25028-02

Prepared & Analyzed: 05/26/06

Benzene	642	25.0	ug/kg dry	666	ND	96.4	70-130			
Toluene	670	25.0	"	666	ND	101	70-130			
Ethylbenzene	699	25.0	"	666	ND	105	70-130			
Xylene (p/m)	1330	25.0	"	1330	ND	100	70-130			
Xylene (o)	713	25.0	"	666	ND	107	70-130			
Naphthalene	547	25.0	"	666	32.7	77.2	70-130			
<i>Surrogate: Dibromofluoromethane</i>	46.8		ug/l	50.0		93.6	70-139			
<i>Surrogate: 1,2-Dichloroethane-d4</i>	41.6		"	50.0		83.2	52-149			
<i>Surrogate: Toluene-d8</i>	41.1		"	50.0		82.2	76-125			
<i>Surrogate: 4-Bromofluorobenzene</i>	39.4		"	50.0		78.8	66-145			

Matrix Spike Dup (EE62606-MSD1)

Source: 6E25028-02

Prepared & Analyzed: 05/26/06

Benzene	631	25.0	ug/kg dry	666	ND	94.7	70-130	1.78	20	
Toluene	655	25.0	"	666	ND	98.3	70-130	2.71	20	
Ethylbenzene	613	25.0	"	666	ND	92.0	70-130	13.2	20	
Xylene (p/m)	1220	25.0	"	1330	ND	91.7	70-130	8.66	20	
Xylene (o)	654	25.0	"	666	ND	98.2	70-130	8.58	20	
Naphthalene	628	25.0	"	666	32.7	89.4	70-130	14.6	20	
<i>Surrogate: Dibromofluoromethane</i>	49.8		ug/l	50.0		99.6	70-139			
<i>Surrogate: 1,2-Dichloroethane-d4</i>	48.8		"	50.0		97.6	52-149			
<i>Surrogate: Toluene-d8</i>	42.7		"	50.0		85.4	76-125			
<i>Surrogate: 4-Bromofluorobenzene</i>	39.8		"	50.0		79.6	66-145			

Rice Operating Co.
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Notes and Definitions

S-06 The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.

J Detected but below the Reporting Limit; therefore, result is an estimated concentration (CLP J-Flag).

DET Analyte DETECTED

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

dry Sample results reported on a dry weight basis

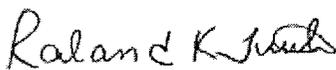
RPD Relative Percent Difference

LCS Laboratory Control Spike

MS Matrix Spike

Dup Duplicate

Report Approved By:



Date:

6/7/2006

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer

Jeanne Mc Murrey, Inorg. Tech Director
LaTasha Cornish, Chemist
Sandra Sanchez, Lab Tech.

This material is intended only for the use of the individual (s) or entity to whom it is addressed, and may contain information that is privileged and confidential.

If you have received this material in error, please notify us immediately at 432-563-1800.

Environmental Lab of Texas

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Environmental Lab of Texas
Variance / Corrective Action Report – Sample Log-In

Client: Pipe Op.

Date/Time: 5/25/06 8:00

Order #: WE25001

Initials: CK

Sample Receipt Checklist

Temperature of container/cooler?	Yes	No	2.0	C
Shipping container/cooler in good condition?	<input checked="" type="checkbox"/>	No		
Custody Seals intact on shipping container/cooler?	<input checked="" type="checkbox"/>	No	Not present	
Custody Seals intact on sample bottles?	<input checked="" type="checkbox"/>	No	Not present	
Chain of custody present?	<input checked="" type="checkbox"/>	No		
Sample Instructions complete on Chain of Custody?	<input checked="" type="checkbox"/>	No		
Chain of Custody signed when relinquished and received?	<input checked="" type="checkbox"/>	No		
Chain of custody agrees with sample label(s)	<input checked="" type="checkbox"/>	No		
Container labels legible and intact?	<input checked="" type="checkbox"/>	No		
Sample Matrix and properties same as on chain of custody?	<input checked="" type="checkbox"/>	No		
Samples in proper container/bottle?	<input checked="" type="checkbox"/>	No		
Samples properly preserved?	<input checked="" type="checkbox"/>	No		
Sample bottles intact?	<input checked="" type="checkbox"/>	No		
Preservations documented on Chain of Custody?	<input checked="" type="checkbox"/>	No		
Containers documented on Chain of Custody?	<input checked="" type="checkbox"/>	No		
Sufficient sample amount for indicated test?	<input checked="" type="checkbox"/>	No		
All samples received within sufficient hold time?	<input checked="" type="checkbox"/>	No		
VOC samples have zero headspace?	<input checked="" type="checkbox"/>	No	Not Applicable	

Other observations:

Variance Documentation:

Contact Person: _____ Date/Time: _____ Contacted by: _____
 Regarding: _____

Corrective Action Taken:



R. T. HICKS CONSULTANTS, LTD.

1909 Brunson Ave ▲ Midland TX 79701 ▲ 432.638.8740 ▲ Fax: 413.403.9968

CERTIFIED MAIL - RETURN RECIEPT NO. 7099 3400 0017 1737 2367

January 20, 2006

Mr. Wayne Price
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**RE: Investigation Characterization Plan: T18S R38E: E-33-1 Junction Box,
B-32 Boot, E-32-1 Junction Box, E-32-2 Junction Box, F-33 Vent**

Hobbs Salt Water Disposal System

Dear Mr. Price:

On behalf of Rice Operating Company, please accept this submission as our Initial Characterization Plan (ICP) for the five (5) sites referenced above within the Hobbs Salt Water Disposal System (Plate 1).

Rice Operating Company (ROC) is the service provider (operator) for the Hobbs Saltwater Disposal System and has no ownership of any portion of pipeline, well, or facility. A consortium of oil producers who own the Hobbs System (System Partners); provide all operating capital on a percentage ownership/usage basis. Major projects require System Partner authorization for expenditures (AFE) approval and work begins as funds are received. We will implement the work outlined herein after NMOCD approval and subsequent authorization from the System Partners.

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

1. protects public health,
2. provides the greatest net environmental benefit,
3. complies with NMOCD Rules, and
4. is supported by good science.

The last criteria employed when evaluating any proposed remedy or investigative work is confirming that there is a reasonable relationship between the benefits created by the proposed remedy or assessment and the economic and social costs.

Each site shall have three submissions or a combination of:

1. This Investigation and Characterization Plan (ICP) is a proposal for data gathering and site characterization and assessment.
2. Upon evaluation of the data and results from the ICP, a recommended remedy will be submitted in a Corrective Action Plan (CAP).
3. Finally, after implementing the remedy, a closure report with final documentation will be submitted.

January 20, 2006

Page 2

Task 1 Evaluate Chloride and BTEXN Concentrations in Soil at Five Sites, Evaluate Ground Water Quality if Necessary

We will follow the same protocol for characterization of the unsaturated zone at the five new ROC sites listed below.

- E-33-1 Junction Box
- B-32 Boot
- E-32-1 Junction Box
- E-32-2 Junction Box
- F-33 Vent

At each of the above-referenced sites, we will locate the sampling borehole as close as practical to the suspected release source. Earlier, we inspected each of the five sites nominated in this ICP and identified the boring location before the sites were backfilled and re-graded. Due to our recent experience with difficulties encountered in the installation of well clusters in this area, we plan to employ hollow-stem auger drilling techniques for sampling.

We will screen each sample in the field for chlorides and volatile organic compounds using the methods described in QP-03 and QP-07 (attached), respectively. Soil lithology and the presence of any observed staining or odor will be recorded. For any site, if we detect evidence of leakage within 15 feet of the water table (e.g. field chloride greater than 250 ppm in soil samples) we will complete the boring as a monitoring well in accordance with NMOCD Guidance. If three soil samples taken at 5-foot intervals test below 250 ppm chloride and below 100 ppm total volatile organic compounds, we will terminate the boring. However, all borings will penetrate at least 30 feet of the vadose zone.

Task 2 Evaluate Chloride and Hydrocarbon Flux from the Vadose Zone to Ground Water

We anticipate that one or all of the five sites selected for borehole investigation will show evidence of seepage from the source to a depth of more than 15-feet. For these sites, excavation and disposal of released material can cause more environmental damage than it cures. For such sites, we propose to employ HYDRUS-1D and a simple ground water mixing model to evaluate the potential of any residual chloride and hydrocarbon mass in the vadose zone to impair ground water quality above WQCC Standards. We have selected these two constituents for simulation modeling because each of these constituents is typically found in produced water and each is specifically regulated by New Mexico ground water regulations (WQCC). We will also employ vadose zone hydrocarbon migration predictive tools commonly employed by NMED in their PST program.

Task 3 Provide Investigative Results and/or Corrective Action Plan

Because the Hobbs SWD System no longer carries produced water, additional releases of produced water to ground water are highly unlikely. If modeling shows that the residual chloride and hydrocarbon mass in the vadose zone poses a no threat to ground water quality, we will prepare a report that makes this demonstration and request site closure.

If simulation experiments suggest that residual constituents pose a threat to ground water quality or if the field program demonstrates impairment, we will expand upon the HYDRUS-1D model predictions described above to develop a remedy for the vadose zone. If necessary, we will simulate:

1. Excavation, disposal and replacement of clean soil to remove the chloride and hydrocarbon mass,
2. Installation of a low permeability barrier to minimize natural infiltration,
3. Surface grading and seeding to eliminate any ponding of precipitation and promote evapotranspiration, thereby minimizing natural infiltration, and
4. A combination of the above potential remedies.

We will select the vadose zone remedy that offers the greatest environmental benefit while causing the least environmental damage. If data suggest that the site has contributed chloride or hydrocarbons to ground water and caused ground water impairment, we will notify NMOCD and work collaboratively to determine the appropriate path forward.

Proposed Schedule

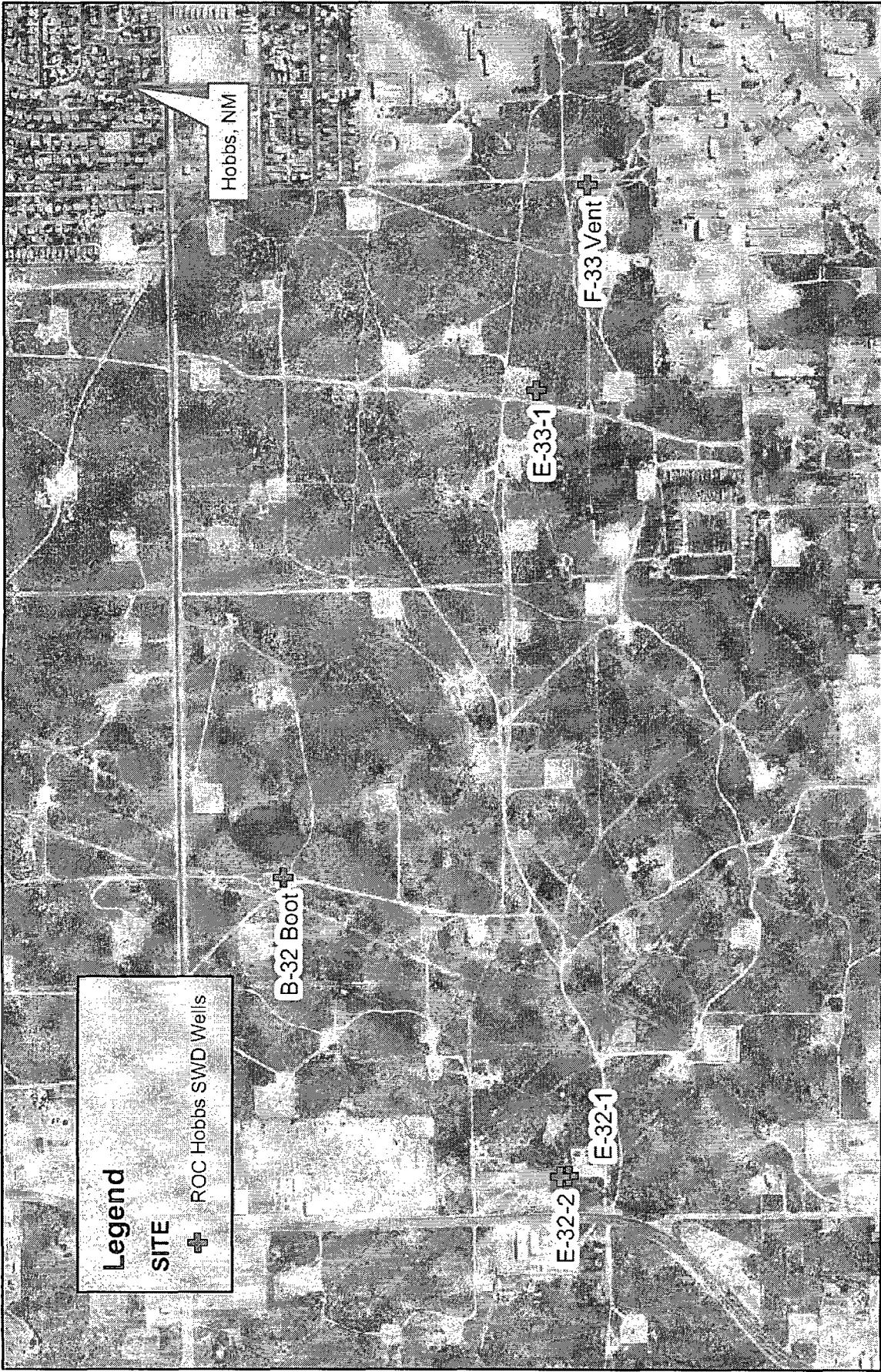
With NMOCD's approval of this work plan, we can perform the field activities at these sites in February or March. In late April or May, we plan to deliver any individual Correction Action Plans to address residual constituents in the vadose zone and any reports requesting site closure. If data suggest ground water impairment we plan to conduct two quarters of ground water monitoring to confirm any initial result then meet with NMOCD to develop an appropriate path forward. Your approval to move forward with this work plan will facilitate approval of expenditures by the System Partners.

Sincerely,
R.T. Hicks Consultants, Ltd.



Gilbert Van Deventer
Project Manager

cc: Chris Williams, NMOCD Hobbs District Office
Carolyn Haynes, Rice Operating Company - Hobbs
Kristin Pope, Rice Operating Company - Hobbs
Randy Hicks, R. T. Hicks Consultants, Ltd. - Albuquerque



Legend
 SITE
 + ROC Hobbs SWD Wells

Hobbs, NM

B-32 Boot

E-32-2

E-32-1

E-33-1

F-33 Vent

Source Map: USGS 7.5' Quad; Hobbs West

0 1,000 2,000 4,000 Feet



<p>R.T. Hicks Consultants, Ltd 901 Rio Grande Blvd NW Suite F-142 Albuquerque, NM 87104 Ph: 505.266.5004</p>	<p>Site Location Map</p>	<p>Plate 1</p>
<p>Rice Operating Company: Investigation Characterization Plan</p>		<p>July 07, 2005</p>

Rice Operating Company

QUALITY PROCEDURE

Sampling and Testing Protocol
Chloride Titration Using .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 10 grams of reverse osmosis water to the soil sample and shake for 20 seconds.
- 4.3 Allow the sample to set for a period of 5 minutes or until the separation of soil and water.
- 4.4 Carefully pour the free liquid extract from the sample through a paper filter into a clean plastic cup if necessary.

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.
- 5.3 If the sample contains any sulfides (hydrogen or iron sulfides are common to oilfield soil samples) add 2-3 drops of hydrogen peroxide (H_2O_2) to mixture.
- 5.4 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.
- 5.5 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 Operating Company

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°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 an Environmental Instruments 13471 OVM / Datalogger or a similar PID-type instrument. (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 conduct BTEX Speciation in accordance with QP-02 and QP-06. If the reading is 100 ppm or less, NMOCD BTEX guideline has been met and no further testing for BTEX is necessary. File the Field Test Report Form in the project file.

4.0 Clean-up

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