

1R - 427-170

REPORTS

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July 10, 2009

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

RECEIVED
JUL 20 2009
Environmental Bureau
Oil Conservation Division

RE: **ICP Report and Termination Request**
EME Jct. J-1 Site (NMOCD Case No. 1R427-170)
T20S-R36E-Section 1, Unit Letter J
Lea County, New Mexico

Mr. Hansen:

On behalf of Rice Operating Company (ROC), Trident Environmental (Trident) is submitting this ICP Report and Termination Request for the above-referenced site in accordance with 19.15.29 NMAC. The investigation demonstrated that neither chloride nor hydrocarbons are present in the vadose zone in quantities that represent a threat to groundwater quality; however, regional impact from an unknown offsite source(s) of chlorides is evident.

Background

In accordance with the OCD-approved *Investigation and Characterization Plan* (ICP) dated December 27, 2007 (Attachment A) to investigate potential groundwater concerns at this site near Monument, five soil borings and two monitoring well installations were conducted on June 2, 2008. Groundwater was encountered at approximately 26 feet below ground surface (ft bgs). The ICP includes background information, a site location map, and a site map showing preliminary soil sampling results performed by ROC in August 2004.

Table 1: Soil Boring Sample Results

Boring/ Monitoring Well	Depth (ft bgs)	Field Chloride (ppm)
B-1	15	324
	20	394
	25	317
B-2	5	232
	10	621
	15	653
	20	392
B-3	25	488
	5	205
	10	475
	15	483
B-4	20	516
	25	408
	5	568
	10	794
B-5	15	543
	20	450
	25	479
	5	147
MW-1	10	276
	15	476
	20	536
	25	780
MW-2	5	272
	10	255
	15	421
	20	561
MW-2	25	676
	5	282
	10	724
	15	497
MW-2	20	423
	25	348

Vadose Zone Sampling Results

Soil samples in each boring and monitoring well were collected at 5-foot intervals and field tested for chloride concentrations. Several samples were split and submitted to Cardinal Laboratories which showed very consistent agreement. Earlier sampling activities during the removal of the junction box and excavation of a 30 ft wide by 30 ft long by 12 ft deep area in August 2004, did not indicate hydrocarbon impact to the vadose zone in any of the samples as all photoionization detector (PID) readings were 0.1 ppm, and total petroleum hydrocarbons (TPH) concentrations were well below OCD guidelines for samples submitted to the laboratory for analysis by Method 8015M (Attachment A).

Visual inspection of all soil samples during the subsequent soil boring activities in June 2008 indicated no presence of hydrocarbons. Results of soil boring sample activities are summarized in Table 1 and depicted on Figure 1. Copies of the soil boring lithologic logs are included in Attachment B. Laboratory analytical reports for soil sample analyses are included in Attachment C.

Field chloride values averaged less than 457 parts per million (ppm) and did not exceed 794 ppm; therefore, there is no indication of the vadose zone beneath the junction box of being a source of chlorides observed in the groundwater on site.

In addition, installation of a clay layer at 6 ft bgs on September 2, 2004, eliminates any potential threat of constituents of concern beneath the former junction box.

The site was tilled and seeded with a native grass mix in October 2004 and is being monitored for growth.

Simulation Modeling

The AMIGO program, developed for the American Petroleum Institute (API), was used to simulate the potential impact to groundwater due to chloride transport through the vadose zone. The input to the model employed all available field data collected from the site. Model input data that was not site-specific was conservatively estimated based on professional judgment, referenced publications, and interpolation of known data from nearby sites. An additional conservative measure taken was in not inputting the very low-permeability clay barrier installed at 6 ft bgs into the model simulation. The results of the simulation indicate that the chloride mass within the vadose zone will not contribute more than 41 mg/L in the groundwater below the site, if no further corrective actions are taken. Therefore, the AMIGO simulation demonstrates that any residual chlorides in the vadose zone do not pose a threat to groundwater quality. Attachment D includes a list of the specific parameters used in the simulation and the output of the AMIGO program for the EME Jct. J-1 site.

Groundwater Sampling Results

The monitoring wells were developed and sampled pursuant to OCD guidelines. Copies of the monitoring well construction diagrams, lithologic logs, and laboratory reports for soil and groundwater analyses are attached. Four quarters of groundwater sampling and laboratory analysis (Table 2) confirms that chloride and total dissolved solids (TDS) exceed the Water Quality Control Commission (WQCC) standards at the site; however, chloride and TDS concentrations are known to be elevated on a regional scale in this area near Monument as is clearly evidenced by the consistently higher chloride and TDS concentrations in the upgradient monitoring well (MW-2) at this site. A monitoring well was not installed downgradient from monitoring well MW-1 because of the likelihood of an unknown, upgradient, and offsite source of chlorides and TDS. Groundwater gradient maps that include the chloride, TDS, and groundwater elevations for each of the five sampling events are depicted in Figures 2A, 2B, 2C, 2D, and 2E. Copies of all laboratory reports for soil and groundwater analyses are included in Attachment C.

Table 2: Summary of Groundwater Monitoring Results

Monitoring Well	Sample Date	Depth to Groundwater (feet BTOC)	Chloride (mg/L)	TDS (mg/L)	Benzene (mg/L)	Toluene (mg/L)	Ethylbenzene (mg/L)	Xylene (mg/L)
MW-1	06/24/08	34.10	5,200	13,300	0.072	0.014	< 0.002	< 0.006
	08/15/08	34.31	5,200	12,100	< 0.001	< 0.001	< 0.001	< 0.003
	11/18/08	34.38	5,350	11,600	< 0.001	< 0.001	< 0.001	< 0.003
	02/17/09	34.39	5,300	11,200	< 0.001	< 0.001	< 0.001	< 0.003
	06/03/09	34.55	5,300	10,700	< 0.001	< 0.001	< 0.001	< 0.003
MW-2	06/24/08	33.76	5,500	14,400	0.017	0.004	< 0.002	< 0.006
	08/15/08	33.87	5,900	12,500	< 0.001	< 0.001	< 0.001	< 0.003
	11/18/08	33.98	5,450	12,200	< 0.001	< 0.001	< 0.001	< 0.003
	02/17/09	33.98	5,500	10,800	< 0.001	< 0.001	< 0.001	< 0.003
	06/03/09	34.13	5,300	12,900	< 0.001	< 0.001	< 0.001	< 0.003
WQCC Standards			250	1000	0.01	0.75	0.75	0.62

The BTEX analytical data from the initial sampling event conducted on June 24, 2008, are not consistent with any of the investigation activities, because no indications of hydrocarbons were observed while collecting subsurface soil samples in August 2004 or July 2008. Furthermore, four subsequent groundwater sampling events confirm BTEX concentrations are below the laboratory detection limits for each constituent. Laboratory or sampling errors are suspected for the June 2008 BTEX anomaly.

Recommendations

The evidence provided herein demonstrates that operation of the EME J-1 junction box did not contribute to the chlorides observed in groundwater at the site, nor does the vadose zone exhibit any potential future threat to groundwater. Therefore, we conclude that conditions at the site do not meet the criteria that would mandate corrective action under Part 29 of NMAC Rule 19 and respectfully request termination of the regulatory file for this site. Upon NMOCD approval of site termination, ROC will plug the monitoring wells.

ROC is the service provider (agent) for the EME Salt Water Disposal System and has no ownership of any portion of the pipelines, wells, or facilities. The EME System is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis. Environmental remediation projects of this magnitude require System Partner AFE approval and work begins as funds are received.

Thank you for your consideration concerning this request for site termination. Please feel free to call me at 432-638-8740 or Hack Conder at 575-393-9174, if you have any questions.

Sincerely,



Gilbert J. Van Deventer, REM, PG
Trident Environmental - Project Manager

cc: Hack Conder (Rice Operating Co. – Hobbs, NM)
Larry “Buddy” Hill (NMOCD District 1 –Hobbs, NM)
Brad Jones (NMOCD - Santa Fe, NM)

Figures

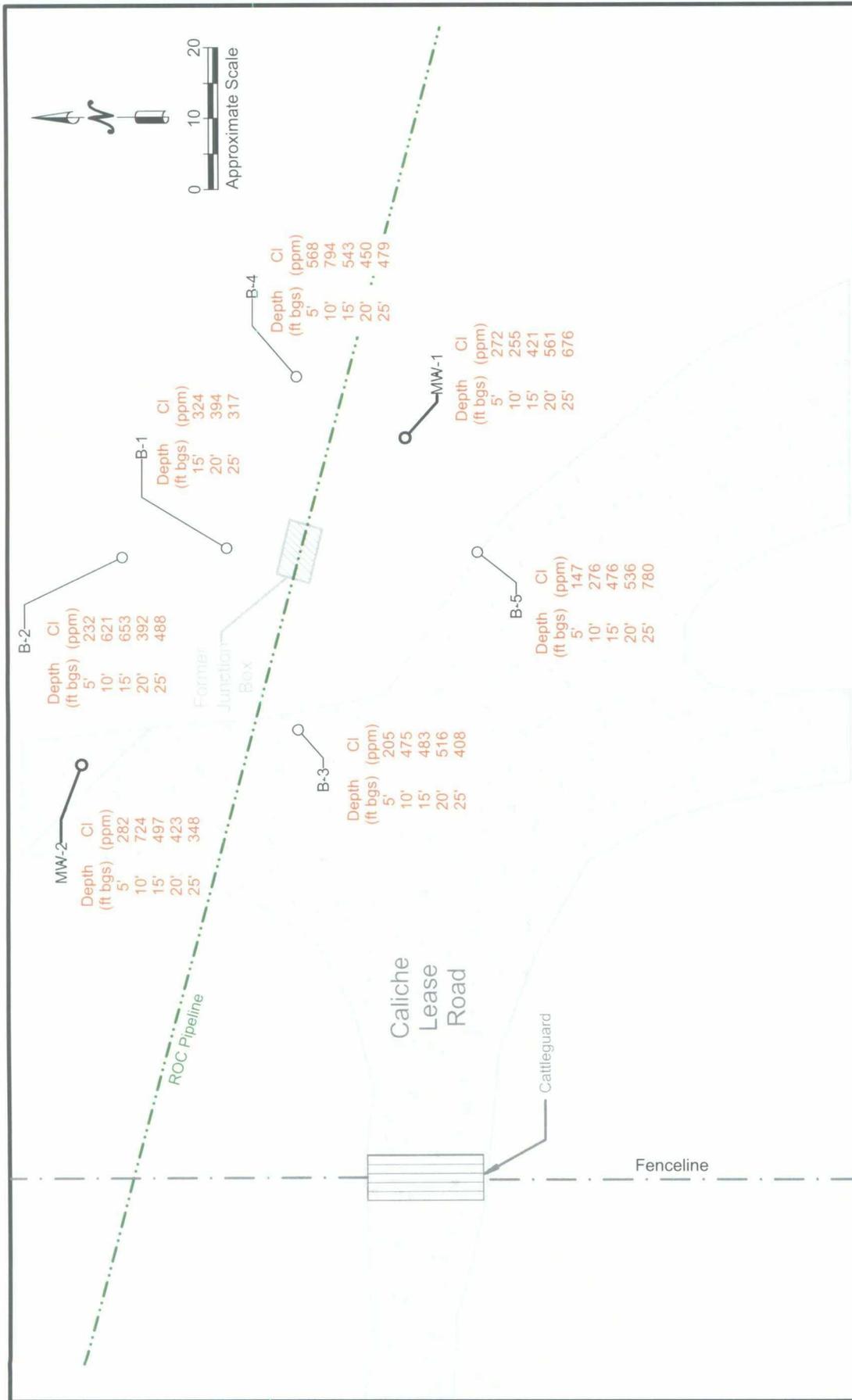
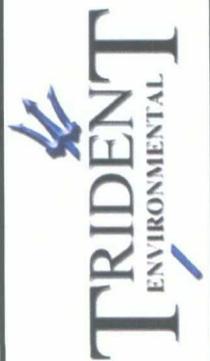


FIGURE 1
SOIL BORING
SAMPLE RESULTS

EME Jct. J-1 Site
T20S - R36E - Section 1, Unit J
RICE *Operating Company*



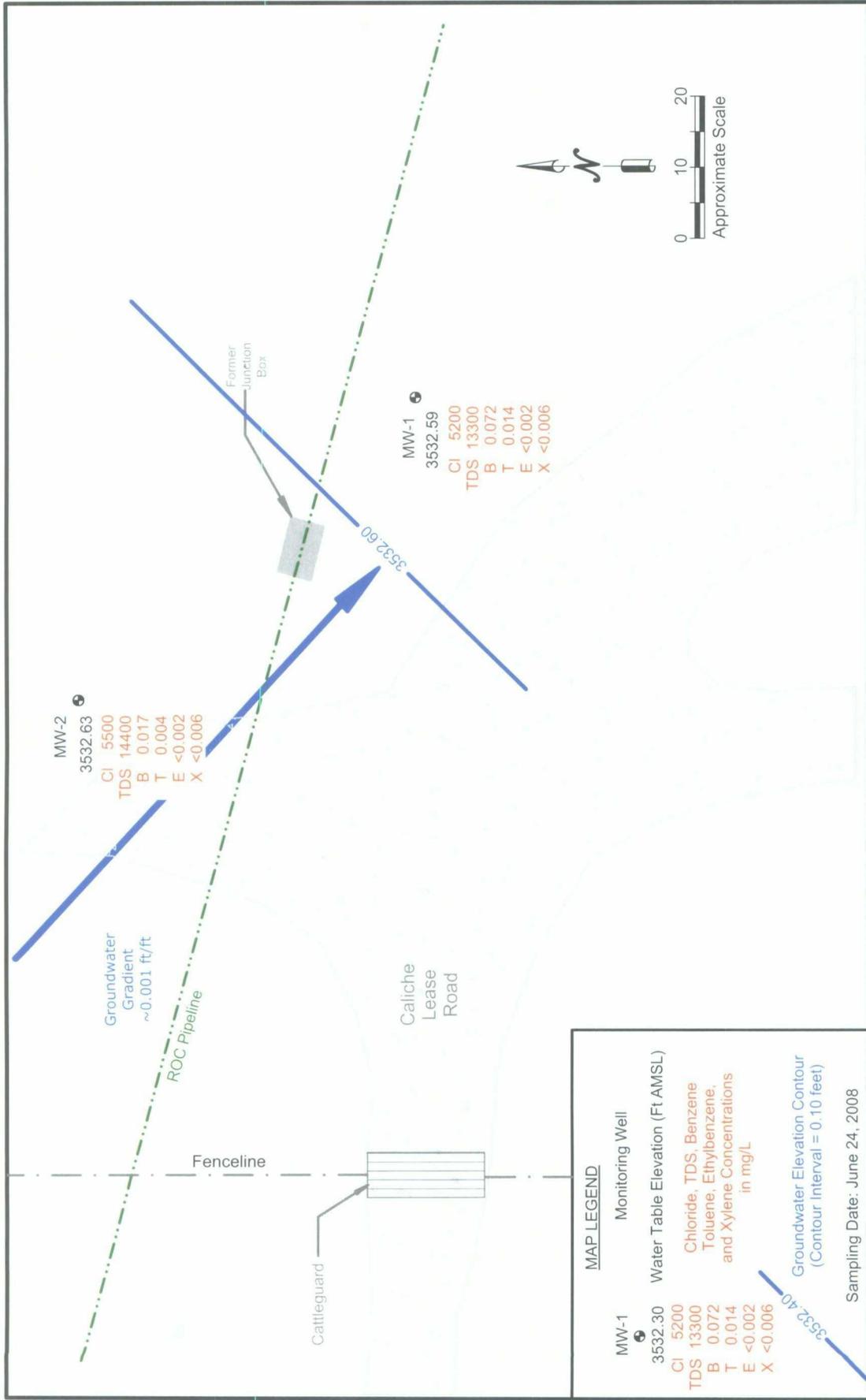
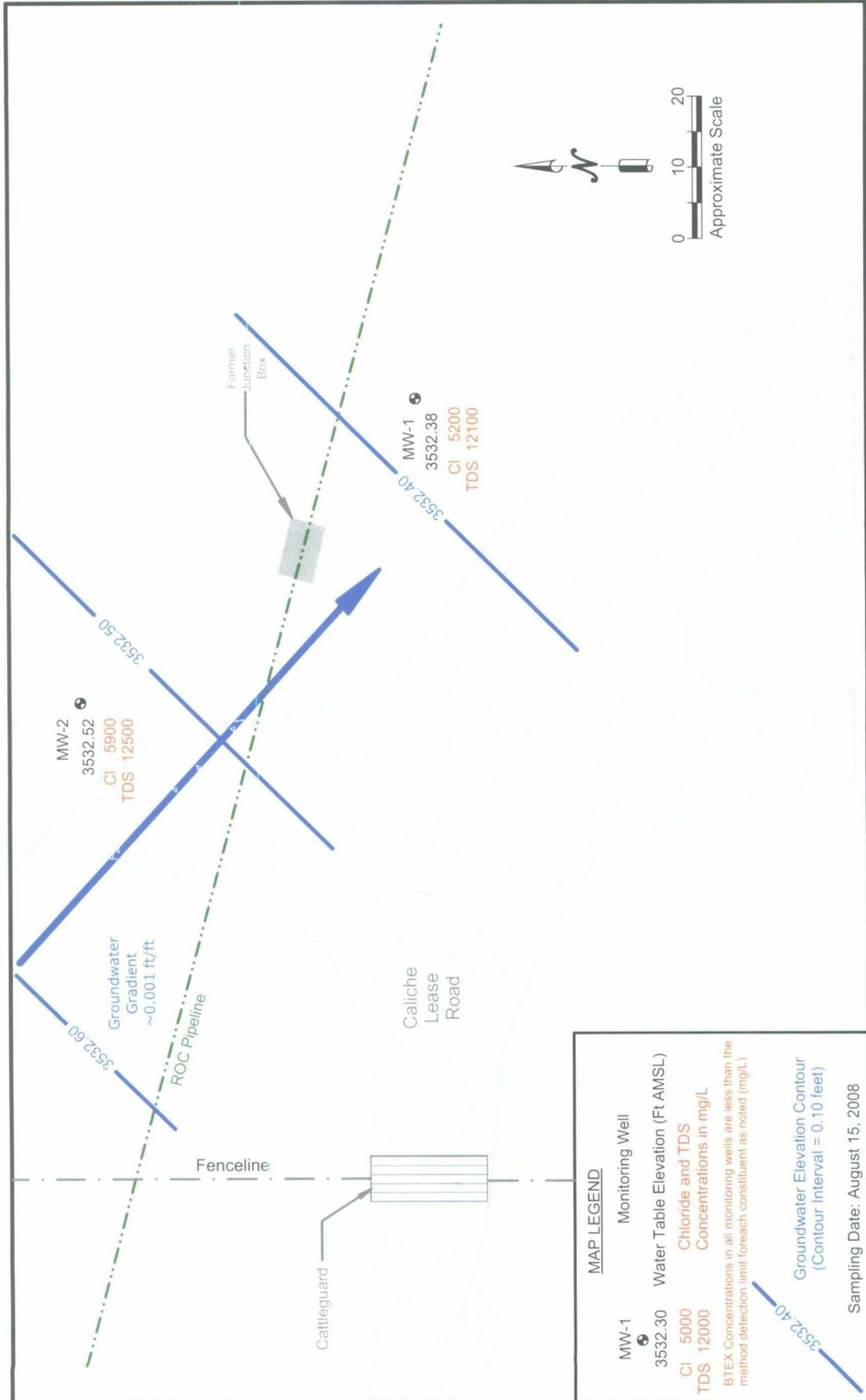


Figure 2A
Groundwater Gradient and
Chloride, TDS, & BTEX
Concentration Map

EME Jct. J-1 Site
T20S - R36E - Section 1, Unit J
RICE Operating Company





MAP LEGEND

- MW-1 Monitoring Well
- 3532.30 Water Table Elevation (Ft AMSL)
- CI 5000 Chloride and TDS Concentrations in mg/L
- TDS 12000
- BTEX Concentrations in all monitoring wells are less than the method detection limit for each constituent as noted (mg/L)
- 3532.40 Groundwater Elevation Contour (Contour Interval = 0.10 feet)

Sampling Date: August 15, 2008

Figure 2B
Groundwater Gradient and
Chloride, TDS, & BTEX
Concentration Map

EME Jct. J-1 Site
T20S - R36E - Section 1, Unit J
RICE Operating Company

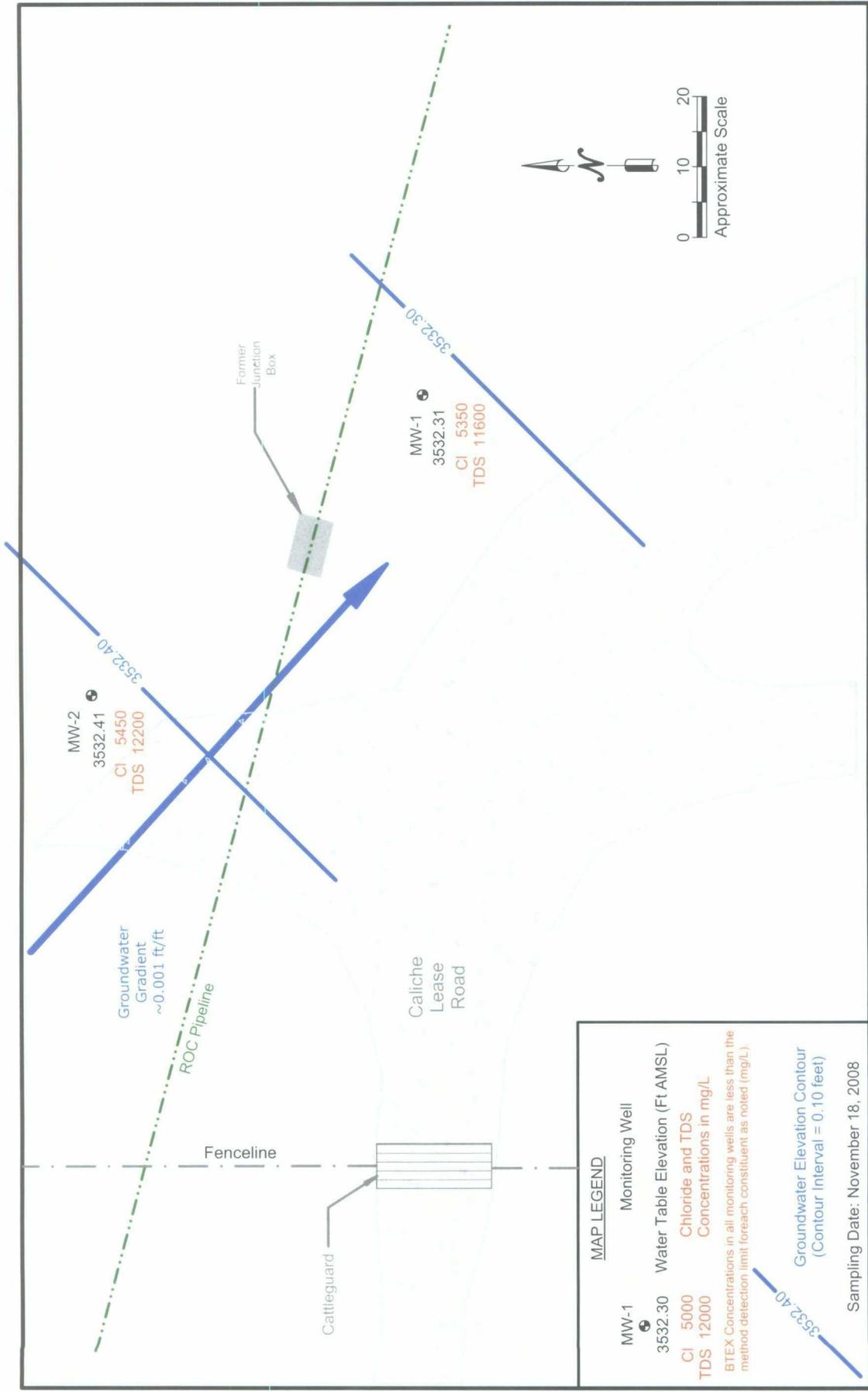
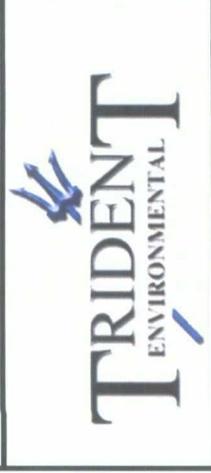
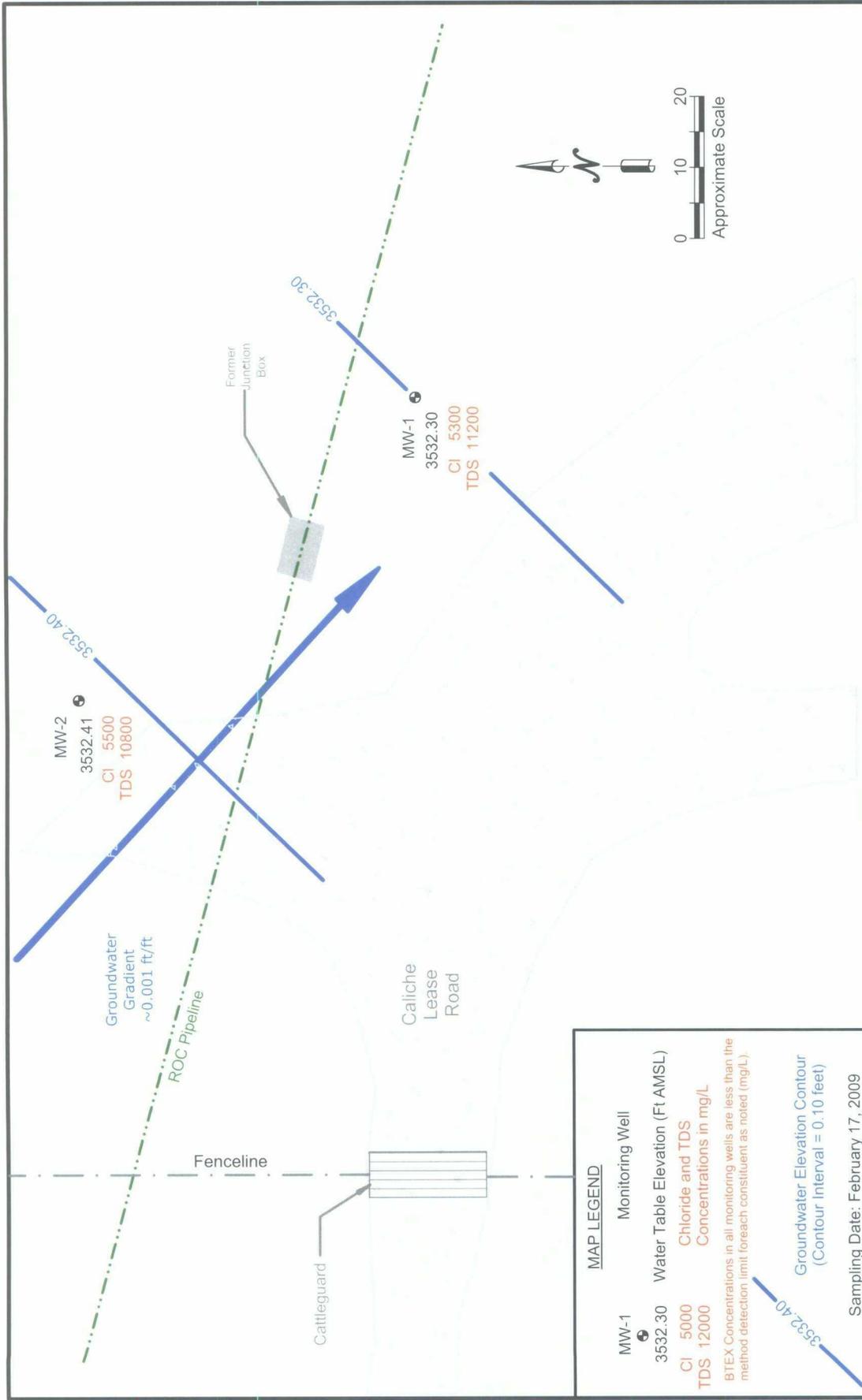


Figure 2C
 Groundwater Gradient and
 Chloride, TDS, & BTEX
 Concentration Map

EME Jct. J-1 Site
 T20S - R36E - Section 1, Unit J
RICE Operating Company





EME Jct. J-1 Site

T20S - R36E - Section 1, Unit J

RICE Operating Company

Figure 2D
Groundwater Gradient and
Chloride, TDS, & BTEX
Concentration Map

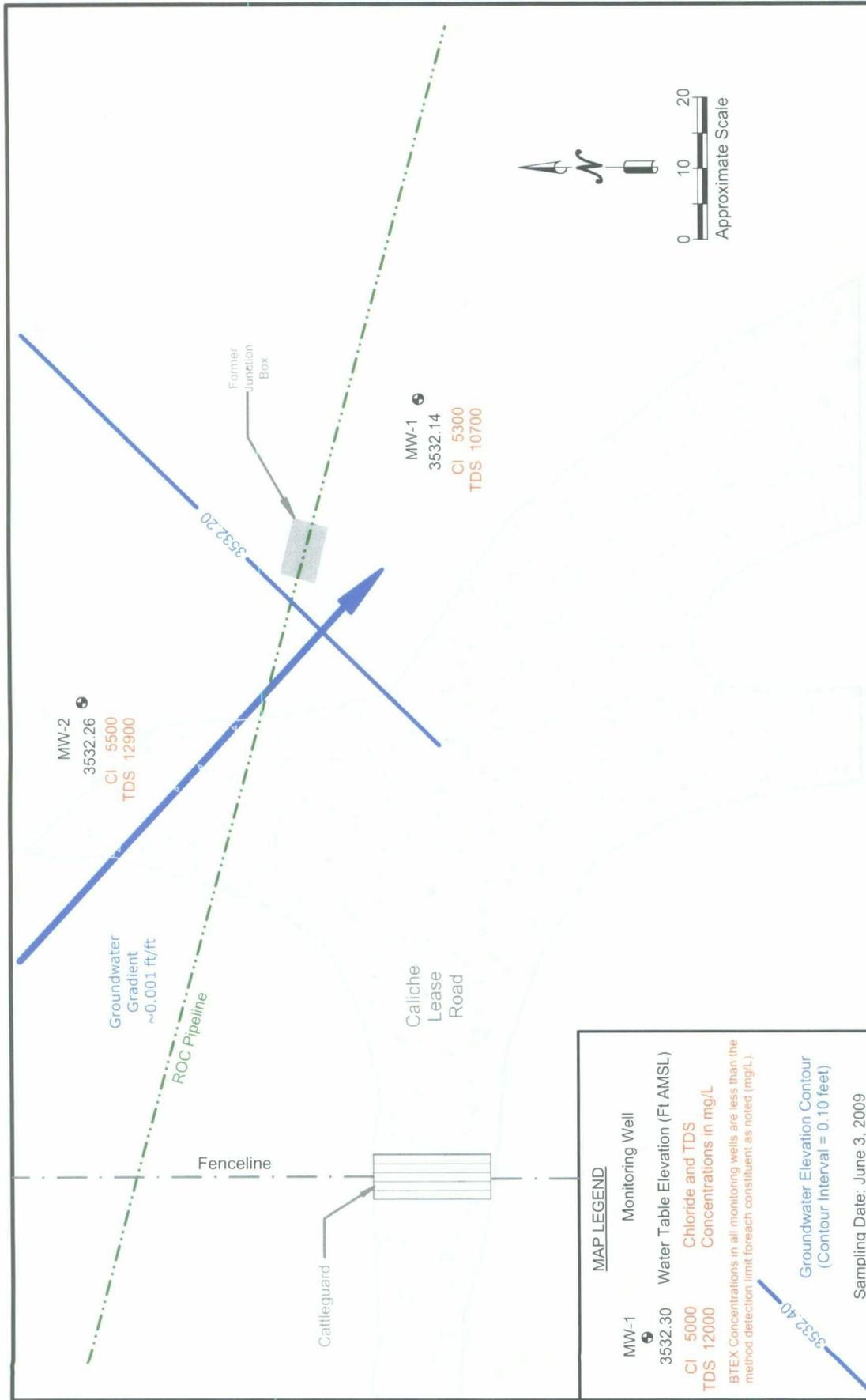
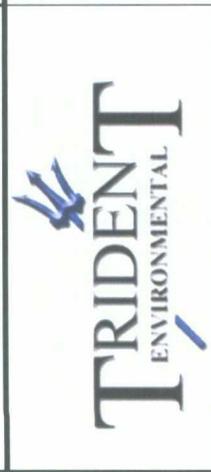


Figure 2E
Groundwater Gradient and
Chloride, TDS, & BTEX
Concentration Map

EME Jct. J-1 Site
T20S - R36E - Section 1, Unit J
RICE Operating Company



Attachment A

**Investigation and Characterization Plan
(December 27, 2007)**



CERTIFIED MAIL
RETURN RECEIPT NO. 7099 3400 0017 1737 2138

December 27, 2007

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

**RE: INVESTIGATION & CHARACTERIZATION PLAN
EME Jct. J-1 Site
T20S-R36E-Section 1, Unit Letter J**

Mr. Hansen:

RICE Operating Company (ROC) has retained Trident Environmental to address potential environmental concerns at the above-referenced site. ROC is the service provider (agent) for the Blinebry-Drinkard (BD) SWD System and has no ownership of any portion of the pipeline, well, or facility. The System is owned by a consortium of oil producers, System Partners, who provide all operating capital on a percentage ownership/usage basis. Environmental projects of this magnitude require System Partner AFE approval and work begins as funds are received. In general, project funding is not forthcoming until NMOCD approves the work plan. Therefore, your timely review of this submission is requested.

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

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

Each site shall 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 evaluating the data and results from this 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.

BACKGROUND

The Jct. J-1 site is located at township 20 south, range 36 east, section 1, unit letter J approximately three miles southwest of Monument, New Mexico as shown on the attached Site Topographic Map (Figure 1). The site is situated on state land with grazing rights allotted to James R. Byrd. Land in the site area is primarily utilized for natural oil and gas production and pasture land for cattle grazing.

Groundwater in the site area occurs within the High Plains aquifer under water table (unconfined) conditions (Hart and McAda, 1985) at a depth of approximately 30-35 feet bgs. The saturated portion of the aquifer is estimated to be 10-15 ft thick (Nicholson and Clebsch, 1961).

PREVIOUS WORK

In March 2004, ROC initiated the removal of the J-1 junction box as part of the Junction Box Upgrade Program. The J-1 junction box was permanently removed and 3-inch polyethylene line was installed inside the existing 8-inch A/C pipeline to maintain the operation of the saltwater disposal system.

Initial soil sampling activities at the former junction box location were conducted between August 16 and 19, 2004 by trenching with a backhoe. During the course of excavating an area 30 feet wide by 30 feet long to a depth of 12 feet below ground surface (bgs), soil samples were collected at regular intervals directly beneath the former junction box, at a point 5 feet north of the junction box, and at 15 feet from the junction box in each of four directions as shown in Figure 2. On August 23, 2004, composite soil samples were recovered from the floor and walls of the excavation, and from blended soil to be used for backfill, for laboratory analysis. All soil samples were tested for chloride content using field-adapted Method 9253 (QP-03) and headspace readings were recorded using a Mini-RAE Model 76 photoionization detector (PID). There was no indication of hydrocarbon impact to the vadose zone in any of the samples as all PID readings were 0.1 ppm, and total petroleum hydrocarbons (TPH) concentrations were well below NMOCD guidelines for samples submitted to the laboratory for analysis by Method 8015M. Although the highest chloride concentration measured only 1,208 parts per million (ppm), chloride levels did not conclusively decline vertically or horizontally throughout the 30 x 30 x 12-ft-deep excavation.

Following characterization activities, the excavated soil was blended on site and backfilled to a depth of 6 feet bgs. A 1-foot thick compacted clay layer was installed to prevent potential downward migration of any residual constituents of concern and the remaining blended soils were placed above the clay. An identification plate was placed on the surface to mark the location of the former junction box and the disturbed surface was seeded with a blend of native vegetation on October 4, 2004.

Notice of potential groundwater impact was sent to the NMOCD October 15, 2004. A Junction Box Disclosure Report (attached) documenting the procedures described above was submitted to the OCD with all the 2004 annual junction box reports.

RECOMMENDATION FOR FURTHER ACTIONS

The replacement of the junction box has minimized the threat of additional impact from the vadose zone, however further investigation and characterization of the site is necessary to delineate the vadose zone below twelve feet and evaluate the potential for groundwater impact. The additional assessment is also necessary to assist ROC in selecting the appropriate soil and/or groundwater remedy.

EME Jct. J-1 Site
T20S-R36E-Section 1, Unit Letter J
December 27, 2007

Task 1 Evaluate Concentrations of Constituents of Concern in the Vadose Zone

Subsurface soil samples for characterization of the lateral and vertical extent of chloride-impacted soil will be collected at a maximum of 5-foot intervals using a drilling rig in accordance with the procedures explained in QP-02, QP-03, and QP-07 (attached). Soil samples will be field-tested for chloride content using the titration method. A concentration of 1,000 ppm chloride will be used to delineate the extent of impact to the vadose zone. Preliminary sampling results indicate no hydrocarbon impact to the vadose zone, however if further sampling activities exhibit evidence of hydrocarbon-impact, samples will also be collected for headspace analysis using an organic vapor meter (OVM), which will be calibrated to assume a benzene response factor. Select samples with OVM headspace readings above 100 ppm, if present, will also be analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX) using EPA Method 8021B.

Task 2 Evaluate Concentrations of Constituents of Concern in the Groundwater

If we detect evidence of groundwater impact, one monitoring well will be placed in the area with the greatest potential for groundwater impact, in accordance with EPA and industry standards and developed by bailing with a rig or hand bailer, or pumping with a submersible pump to remove fine-grained sediment disturbed during drilling and to ensure collection of representative samples. If data suggest ground water impairment, two quarters of ground water monitoring will be conducted to confirm any initial result. If groundwater impact is confirmed, additional monitoring wells may be installed to determine the local groundwater gradient direction and lateral extent of groundwater impact. Groundwater samples will be collected in accordance with procedures explained in QP-04 and QP-05 (attached), and analyzed for BTEX, major ions, and total dissolved solids (TDS).

The information gathered from tasks 1 and 2 will be evaluated and utilized to design a soil and/or ground water remedy if needed. The remedy that offers the greatest environmental benefit while causing the least environmental impairment will be selected. Such recommendations and findings will be presented to NMOCD in a subsequent Corrective Action Plan (CAP). When evaluating any proposed remedy or investigative work, ROC will confirm that there is a reasonable relationship between the benefits created by the proposed remedy or assessment and the economic and social costs.

We appreciate the opportunity to work with you on this project. Please feel free to call me at 432-638-8740 or Kristin Pope at 505-393-9174, if you have any questions.

Sincerely,



Gilbert J. Van Deventer, REM, PG
Trident Environmental - Project Manager

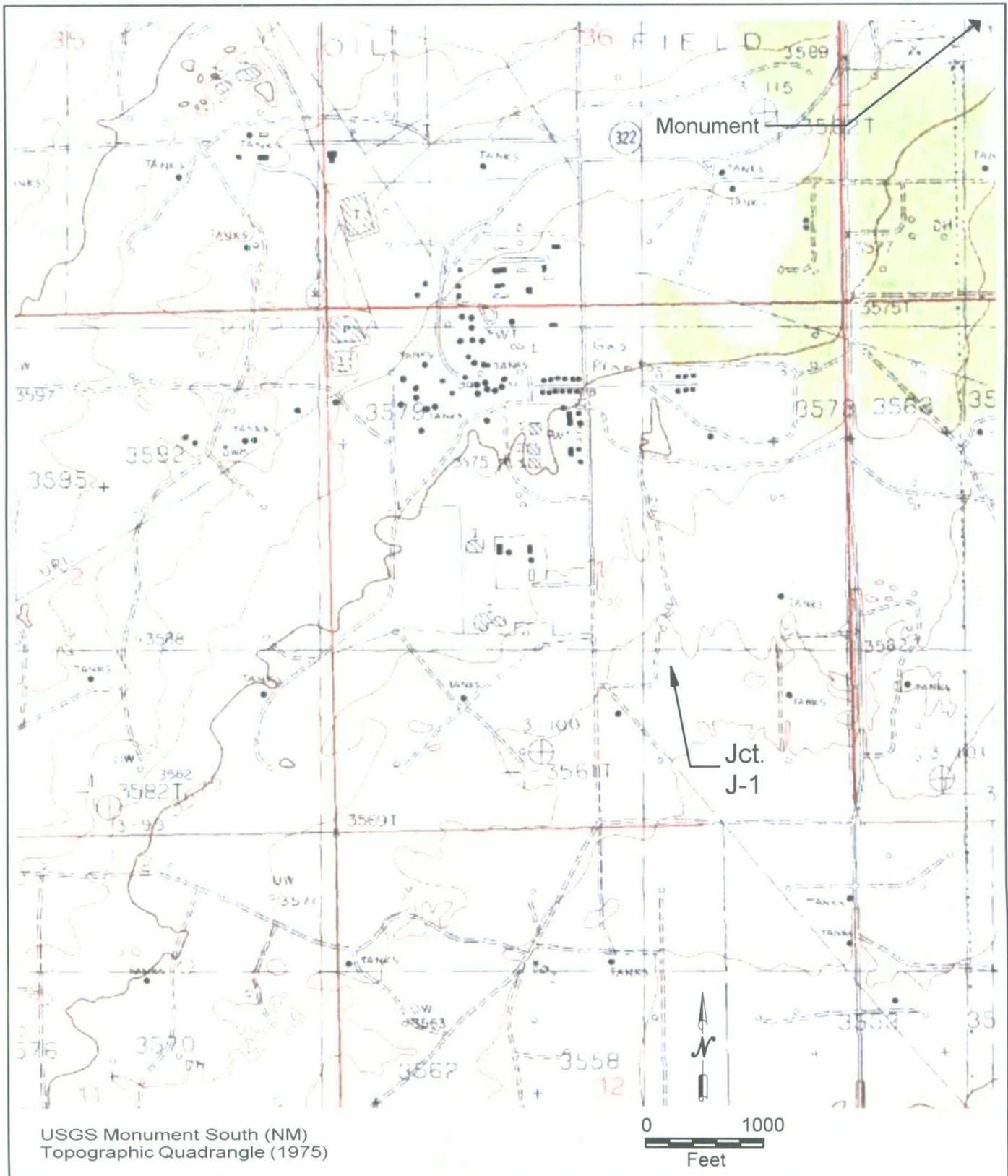
cc: CDH, JSC, KFP, file

enclosures: site location and sampling maps, disclosure report, photos, and sampling procedures

Site Location Map

And

Site Map of Soil Sampling Results



EME Jct. J-1 Site
T20S - R37E - Section 6 - Unit L
RICE Operating Company

FIGURE 1
SITE
TOPOGRAPHIC MAP

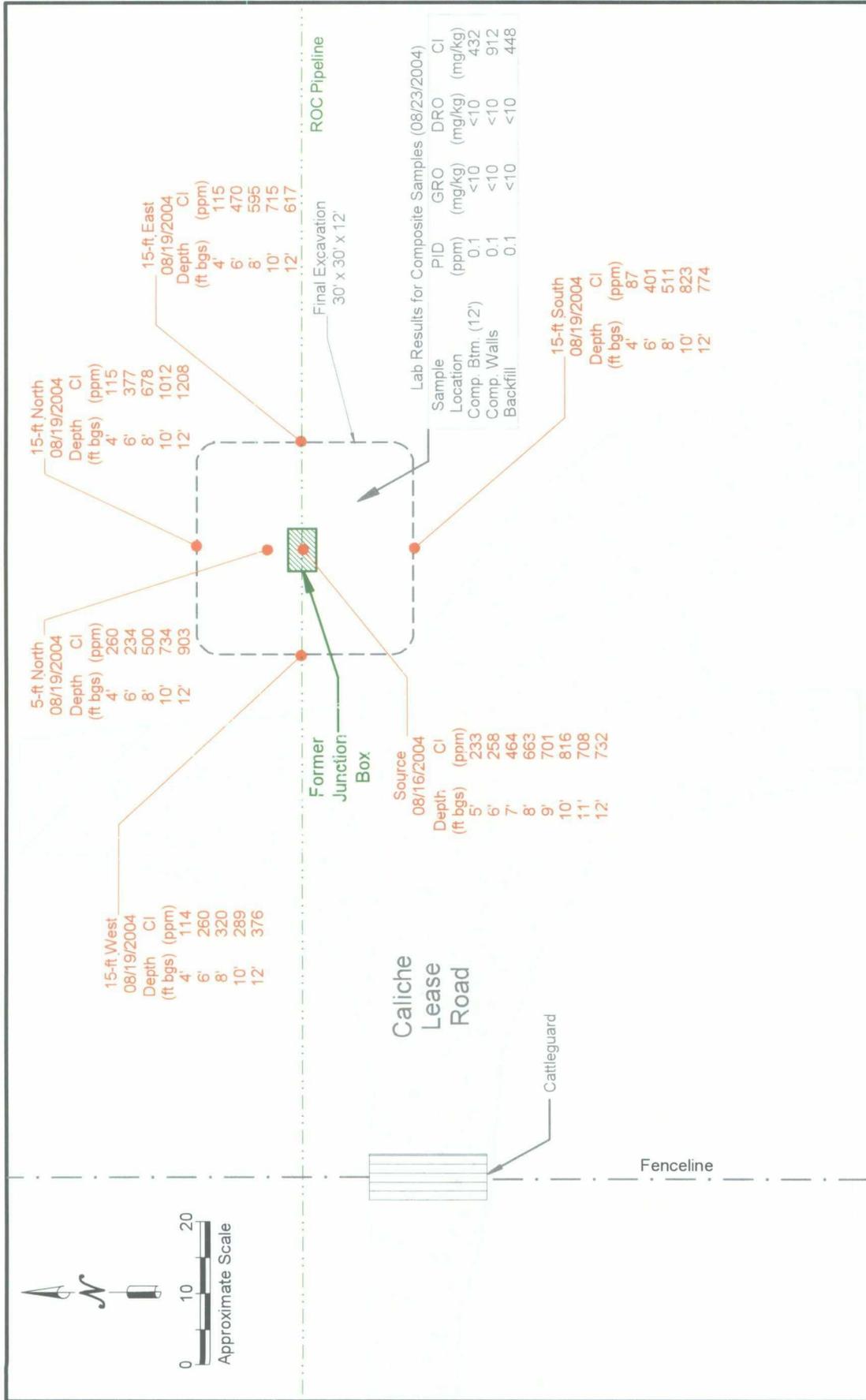


FIGURE 2
EXCAVATION SOIL
SAMPLING RESULTS

EME Jct. J-1 Site
T210S - R376E - Section 1, Unit J
RICE Operating Company





Junction Box Disclosure Report

RICE OPERATING COMPANY
JUNCTION BOX DISCLOSURE* REPORT

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
							Length	Width	Depth
EME	J-1	J	1	20S	36E	Lea	no box—eliminated		

LAND TYPE: BLM _____ STATE X FEE LANDOWNER _____ OTHER _____

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

Date Started 8/16/2004 Date Completed 9/6/2004 OCD Witness No

Soil Excavated 400 cubic yards Excavation Length 30 Width 30 Depth 12 feet

Soil Disposed 0 cubic yards Offsite Facility n/a Location n/a

FINAL ANALYTICAL RESULTS: Sample Date 8/23/2004 Sample Depth 12 ft

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

CHLORIDE FIELD TESTS

Sample Location	PID ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
4-WALL COMP.	0.1	<10.0	<10.0	432
BOTTOM COMP.	0.1	<10.0	<10.0	912
REMED. BACKFILL	0.1	<10.0	<10.0	448

LOCATION	DEPTH (ft)	ppm
vertical at junction	5	233
	6	258
	7	464
	8	663
	9	701
	10	816
	11	708
15 ft North of junction	12	732
	4	115
	6	377
	8	678
background	10	1012
	12	1208
background	n/a	60
4-wall comp.	n/a	311
bottom comp.	12	738
remed. backfill	n/a	415

General Description of Remedial Action: This junction has been eliminated and slip-lined with a new poly pipeline. The box lumber was removed and the site was delineated using a backhoe while PID screenings and chloride field tests were conducted at regular intervals. Chloride concentrations did not conclusively decline vertically or horizontally throughout the 30 x 30 x 12-ft-deep excavation. No physical indications of hydrocarbon impact were observed, all PID readings were 0.1 ppm, and TPH concentrations were well below NMOCD guidelines. The excavated soil was blended on site and backfilled to 6 ft BGS. At 6 ft, a 1-ft-thick compacted clay barrier was installed to inhibit the downward migration of chloride. The remaining soils were backfilled on top of the clay. The disturbed surface was seeded with a blend of native vegetation on 10/4/2004 and will be monitored for growth. An identification plate has been placed on the surface for future considerations.

ADDITIONAL EVALUATION IS HIGH PRIORITY

enclosures: chloride graphs, photos, lab results, PID field screenings, clay test, diagram

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

SITE SUPERVISOR Joe Gatts SIGNATURE Joe Gatts COMPANY RICE Operating Company

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE Kristin Farris Pope

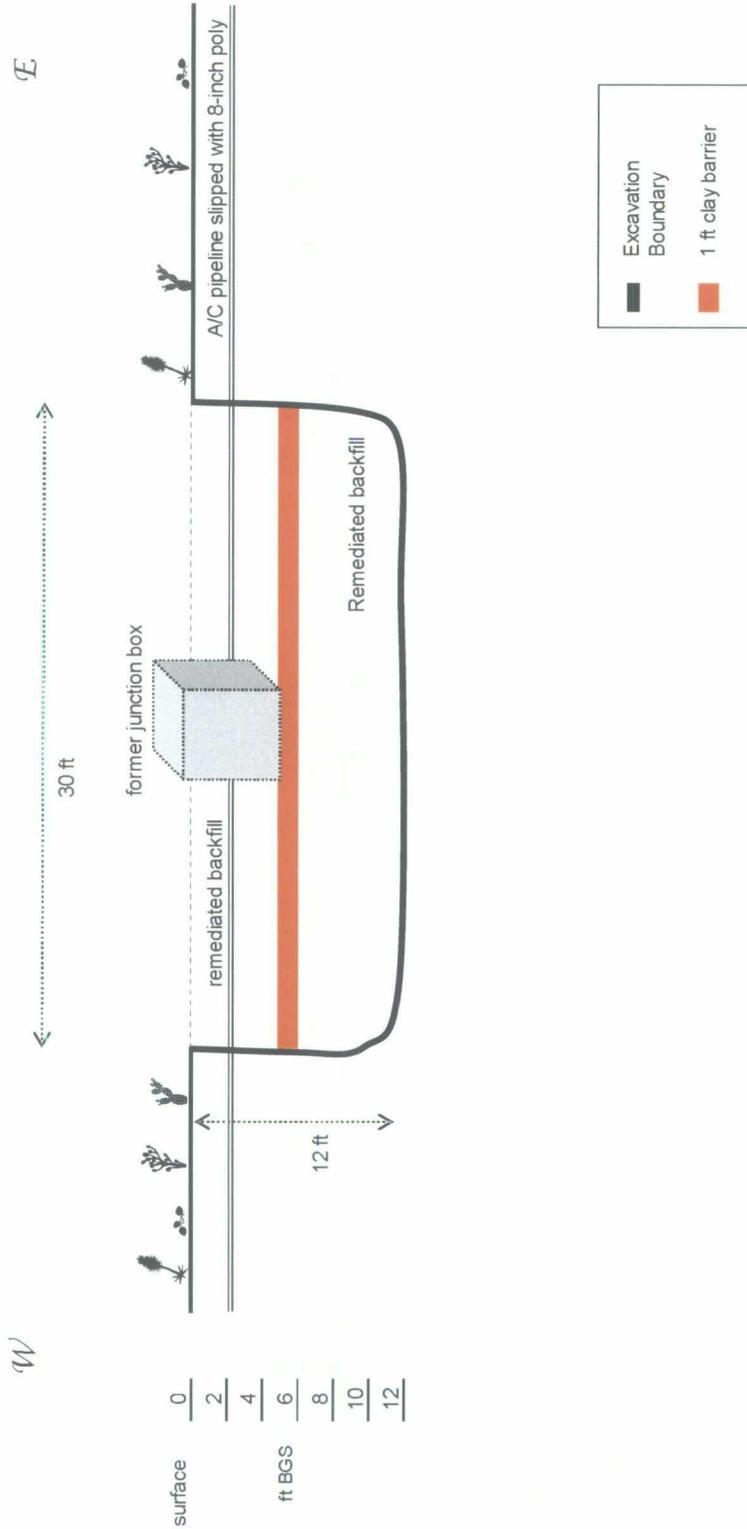
DATE 10/15/2004 TITLE Project Scientist

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

EME jct. J-1

30 x 30 x 12 ft

Excavation Cross-Section



CHLORIDE CONCENTRATION CURVE

EME jct. J-1

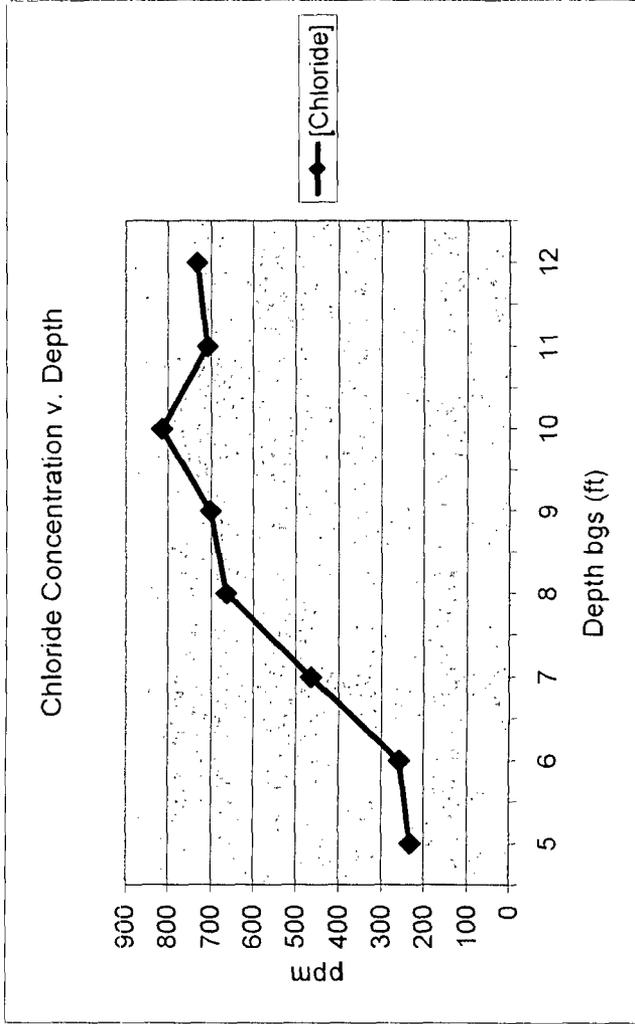
T20S, R36E

Vertical Delineation at Source

Depth bgs (ft)	[Cl ⁻] ppm
5	233
6	258
7	464
8	663
9	701
10	816
11	708
12	732

Groundwater = 40 ft

RICE Operating Company



CHLORIDE CONCENTRATION CURVE

EME jct. J-1

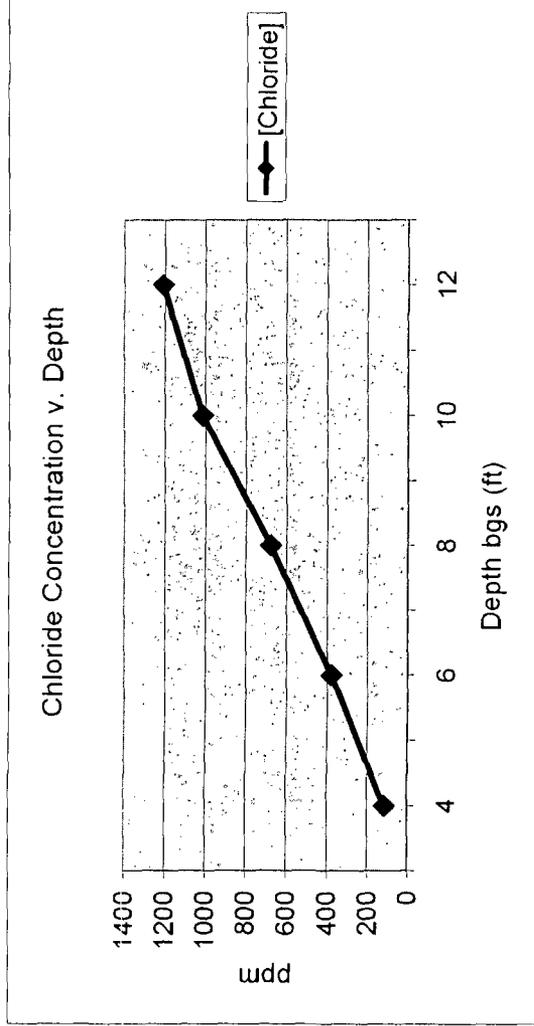
T20S, R36E

1.5 ft North of Junction

Depth bgs (ft)	[Cl ⁻] ppm
4	115
6	377
8	678
10	1012
12	1208

Groundwater = 40 ft

RICE Operating Company



EME jct. J-1

unit J, Sec. 1, T20S, R36E



undisturbed junction box

12/30/2003



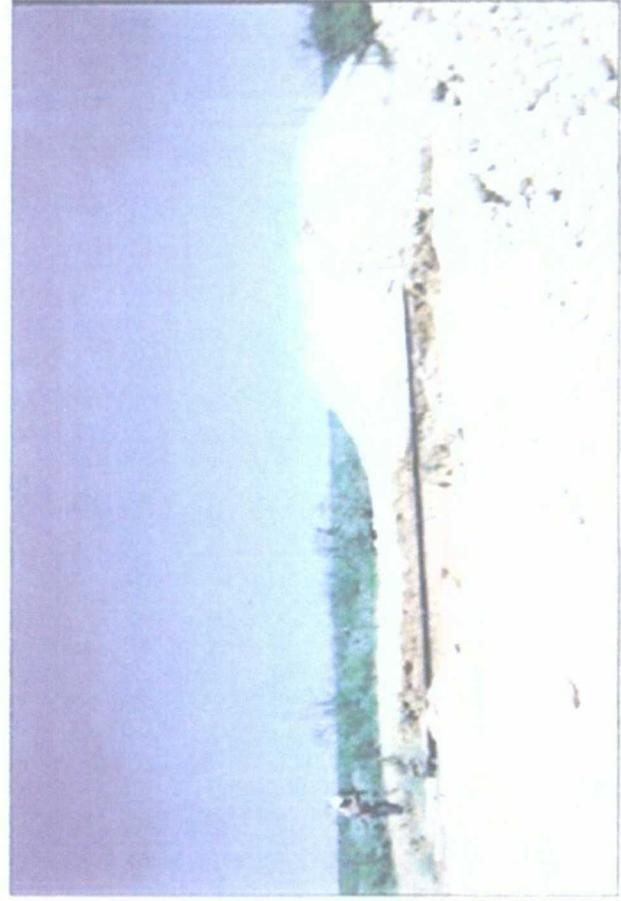
box lumber removed

7/28/2004



beginning excavation

8/16/2004



final excavation

8/23/2004



testing clay

9/2/2004



compacted clay at 6 ft BGS

9/2/2004



seeding disturbed surface: ID plate in foreground

10/4/2004



tilling seed into soil

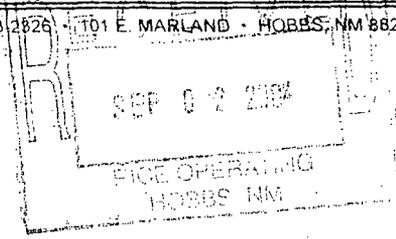
10/4/2004



ARDINAL LABORATORIES

PHONE (325) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2826 • 101 E. MARLAND • HOBBS, NM 88240



ANALYTICAL RESULTS FOR
RICE OPERATING
ATTN: ROY RASCON
122 W. TAYLOR
HOBBS, NM 88240
FAX TO:

Receiving Date: 08/26/04
Reporting Date: 08/30/04
Project Number: NOT GIVEN
Project Name: EME J-1
Project Location: NOT GIVEN

Sampling Date: 08/23/04
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (>C ₁₀ -C ₂₈) (mg/Kg)	CI* (mg/Kg)
	ANALYSIS DATE	08/28/04	08/28/04	08/27/04
H9080-1	BOTTOM COMP @ 12'BGS	<10.0	<10.0	912
H9080-2	4 WALL COMP.	<10.0	<10.0	432
H9080-3	REMD. BACKFILL	<10.0	<10.0	448
	Quality Control	791	780	1010
	True Value QC	800	800	1000
	% Recovery	98.9	97.5	101
	Relative Percent Difference	1.0	1.8	6.8

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI: Std. Methods 4500-CI'B
*Analyses performed on 1:4 w:v aqueous extracts.

Burgess A. Cooke
Chemist

8/30/04
Date

H9080.XLS

HOBBS, NEW MEXICO 88240
 PHONE: (505) 393-9174 FAX: (505) 397-1471
VOC FIELD TEST REPORT FORM
 MINI RAE PLUS CLASSIC PHOTOIONIZATION GAS DETECTOR

MODEL NO: PGM 761S
 CALIBRATION GAS
 GAS COMPOSITION: ISOBUTYLENE
 AIR
 LOT NO: 02-22-30
 EXP. DATE: 11/20/04
 METER READING
 ACCURACY: 100.1

SERIAL NO: 104412
 100 PPM
 BALANCE
 FILL DATE: 5/20/03
 ACCURACY: + or - 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
EME	J-1	J	(

SAMPLE	PID RESULT	SAMPLE	PID RESULT
15' North 4'	0.1	15' South 10'	0.1
15' North 6'	0.1	15' South 12'	0.1
15' North 8'	0.1	15' West 4'	0.1
15' North 10'	0.1	15' West 6'	0.1
15' North 12'	0.1	15' West 8'	0.1
15' East 4'	0.1	15' West 10'	0.1
15' East 6'	0.1	15' West 12'	0.1
15' East 8'	0.1		
15' East 10'	0.1		
15' East 12'	0.1		
15' South 4'	0.1		
15' South 6'	0.1		
15' South 8'	0.1		

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

Joe Harts
 Signature

8/19/04
 Date

HOBBS, NEW MEXICO 88240
 PHONE: (505) 393-9174 FAX: (505) 397-1471
VOC FIELD TEST REPORT FORM
 MINI RAE PLUS CLASSIC PHOTOIONIZATION GAS DETECTOR

MODEL NO: PGM 761S
 CALIBRATION GAS
 GAS COMPOSITION: ISOBUTYLENE
 AIR
 LOT NO: 02-22-30
 EXP. DATE: 11/20/04
 METER READING
 ACCURACY: 100.1

SERIAL NO: 104412
 100 PPM
 BALANCE
 FILL DATE: 5/20/03
 ACCURACY: + or - 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
EME	J-1	J	1		

SAMPLE	PID RESULT	SAMPLE	PID RESULT
15' North 4'	0.1	15' South 10'	0.1
15' North 6'	0.1	15' South 12'	0.1
15' North 8'	0.1	15' West 4'	0.1
15' North 10'	0.1	15' West 6'	0.1
15' North 12'	0.1	15' West 8'	0.1
15' East 4'	0.1	15' West 10'	0.1
15' East 6'	0.1	15' West 12'	0.1
15' East 8'	0.1		
15' East 10'	0.1		
15' East 12'	0.1		
15' South 4'	0.1		
15' South 6'	0.1		
15' South 8'	0.1		

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

Joe Hall
 Signature

8/19/04
 Date



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: Carolyn Haynes
 122 W. Taylor
 Hobbs, NM 88240

Material: Red Clay

Test Method: ASTM: D 2922

Project: *EME*
 JCT J-147E

Date of Test: August 24, 2004

Depth: 2' Below Bottom of Pipe

Test No.	Location	Dry Density % Maximum	% Moisture	Depth
SG-1	Pit - 20' W. & 10' N. of SE Corner	104.4	16.7	

Control Density: 106.2
 ASTM: D 698

Optimum Moisture: 17.3

Required Compaction: 95%

Lab No.: 04 10114-10115

PETTIGREW & ASSOCIATES

Copies To: Rice

BY: *[Signature]* S.E.T.

RICE Operating Company
Quality Procedures

QP-02: Procedure for Obtaining Soil Samples for Transportation to a Lab

QP-03: Sampling and Testing Protocol for Chloride Titration

QP-04: Development of Cased Water-Monitoring Wells

QP-05: Procedure for Obtaining Water Samples (Cased Wells)

QP-07: Sampling and Testing Protocol for VOC in Soil

Rice Operating Company

Quality Procedure

**Procedure for Obtaining
Soil Samples for Transportation to a Laboratory**

1.0 Purpose

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

2.0 Scope

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

3.0 Preliminary

- 3.1 Obtain sterile sampling containers from the testing laboratory designated to conduct analyses of the soil. The shipment should include a Certificate of Compliance from the manufacturer of the collection bottle or vial and a Serial Number for the lot of containers. Retain this Certificate for future documentation purposes.
- 3.2 If collecting TPH, BTEX, RCRA 8 metals, cation /anions or O&G, the sample jar may be a clear 4 oz. container with Teflon lid. If collecting PAH's, use an amber 4 oz. container.

4.0 Chain of Custody

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

5.0 Sampling Procedure

- 5.1. Do not touch the soil with your bare hands. Use new latex gloves with each sample to help minimize any cross-contamination.
- 5.2. Go to the sampling point with the sample container. If not analyzing for ions or metals, use a trowel to obtain the soil.
- 5.3. Pack the soil tightly into the container leaving the top slightly domed. Screw the lid down tightly. Enter the time of collection onto the sample collection jar label.
- 5.4. Place the sample directly on ice for transport to the laboratory if required.
- 5.5. Complete the Chain of Custody form to include the collection times for each sample. Deliver all samples to the laboratory.

6.0 Documentation

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

Rice 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
Development of Cased Water-Monitoring Wells

1.0 Purpose

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

2.0 Scope

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

3.0 Sample Collection and Preparation

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

4.0 Purging

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

5.0 Water Disposal

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

6.0 Records

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

Rice Operating Company

Quality Procedure

**Procedure for Obtaining Water Samples (Cased Wells)
Using One Liter Bailer**

1.0 Purpose

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

2.0 Scope

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

3.0 Preliminary

3.1 Obtain sterile sampling containers from the testing laboratory designated to conduct analyses of the water. The shipment should include a Certificate of Compliance from the manufacturer of the collection bottle or vial and a Serial Number for the lot of containers. Retain this Certificate for future documentation purposes.

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

Compound to be Analyzed	Sample Container Size	Sample Container Description	Cap Requirements	Preservative	Maximum Hold Time
BTEX	40 ml	VOA Container	Teflon Lined	HCl	7 days
TPH	1 liter	clear glass	Teflon Lined	HCl	28 days
PAH	1 liter	amber glass	Teflon Lined	Ice	7 days
Cation/Anion	1 liter	clear glass	Teflon Lined	None	48 Hrs
Metals	1 liter	HD polyethylene	Any Plastic	Ice/HNO ₃	28 Days
TDS	300 ml	clear glass	Any Plastic	Ice	7 Days

4.0 Chain of Custody

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

5.0 Bailing Procedure

- 5.1 Identify the well from the sites schematics. Place pre-labeled jar(s) next to the well. Remove the plastic cap from the well bore by first lifting the metal lever and then unscrewing the entire assembly.
- 5.2 Using a dedicated one liter Teflon bailer, purge a minimum of three well volumes. Place the water in storage container for transport to a ROC disposal facility.
- 5.3 Take care to insure that the bailing device and string do not become cross-contaminated. A clean pair of rubber gloves should be used when handling either the retrieval string or bailer. The retrieval string should not be allowed to come into contact with the ground.

6.0 Sampling Procedure

- 6.1 Once the well has been bailed in accordance with 5.2 of this procedure, a sample may be decanted into the appropriate sample collection jar directly from the bailer. The collection jar should be filled to the brim. Once the jar is sealed, turn the jar over to detect any bubbles that may be present. Add additional water to remove all bubbles from the sample container.
- 6.2 Note the time of collection on the sample jar with a fine Sharpie.

6.3 Place the sample directly on ice for transport to the laboratory. The preceding table shows the maximum hold times between collection and testing for the various analyses.

6.4 Complete the Chain of Custody form to include the collection times for each sample. Deliver all samples to the laboratory.

7.0 Documentation

7.1 The testing laboratory shall provide the following minimum information:

- A. Project and sample name.
- B. Signed copy of the original Chain of Custody Form including the time the sample was received by the lab.
- C. Results of the requested analyses
- D. Test Methods employed
- E. Quality Control methods and results

Calculation for Determining the Minimum Bailing Volume for Monitor Wells

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

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

V=Volume

$\pi = \text{pi}$

r=inside radius of the well bore

h=maximum height of well bore in water table

Example:

π	r^2	h(in)	V(cu.in)	V(gal)	X 3 Volumes	Actual
3.1416	1	180	565.488	2.448	7.34 gal	>10 gal

Rice 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^oF). 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, NMOCB 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.**

Gil Van Deventer

 From: "Gil Van Deventer" <gilbertvandeventer@suddenlink.net>
"Hansen, Edward J., EMNRD" <edwardj.hansen@state.nm.us>
"Scott Curtis" <scurtis@riceswd.com>; "Wayne Price" <wayne.price@state.nm.us>; "Kristin Pope"
<kpope@riceswd.com>
Sent: Thursday, December 27, 2007 10:57 AM
Attach: J-1 ICP_sans_Discl-Rpt_QP.pdf
Subject: Investigation & Characterization Plan - EME Jct. J-1 Site

Attention: Edward Hansen, New Mexico Oil Conservation Division - Environmental Bureau

Subject: Investigation & Characterization Plan

Site Name: EME Jct. J-1 Site

Site Location: T20S-R36E-Section 1, Unit Letter J

Site Agent: RICE Operating Company

Hello Edward:

Trident Environmental is pleased to submit the attached abbreviated version of the *Investigation & Characterization Plan* (ICP) for the above-referenced site. One complete hard copy and one copy on compact disk is being sent via USPS Certified Mail (# 7099 3400 0017 1737 2138) today.

Thank you for your consideration of this ICP. If you have any questions, please contact me at 432-638-8740, or Kristin Pope at 505-393-9174.

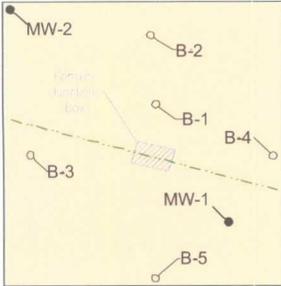

Sincerely,
Gilbert J. Van Deventer, PG, REM
Trident Environmental
www.trident-environmental.com
Work/Mobile: 432-638-8740
Fax: 413-403-9968
Home: 432-682-0727

Attachment B

Lithologic Logs

And

Monitoring Well Construction Diagrams



SOIL BORING LITHOLOGIC LOG

BOREHOLE NO.: B-1 TOTAL DEPTH: 25 Feet
 SITE ID: EME Jct. J-1 CLIENT: RICE Operating Company
 CONTRACTOR: Harrison & Cooper, Inc. COUNTY: Lea
 DRILLING METHOD: Air Rotary STATE: New Mexico
 START DATE: 06/02/08 LOCATION: T20S-R37E-Sec 1-Unit J
 COMPLETION DATE: 06/02/08 FIELD REP.: G. Van Deventer
 COMMENTS: Boring located at 10 feet north of former junction box (plate marker)

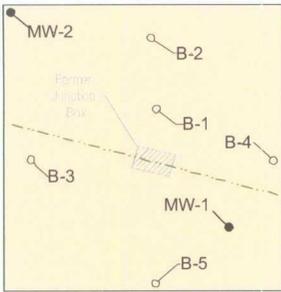
Depth	Sample		Chloride (ppm)		USCS	LITHOLOGIC DESCRIPTION: LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
	Time	Type	Field	Lab		
Surface						Compacted backfill material consisting of fine-grained sand, very pale orange (10YR 8/2) with calcium carbonate in matrix. Sand grains are moderately well-sorted, subrounded, unconsolidated, dry.
5					BF	Compacted clay layer, grayish red (5R 4/2).
10					BF	Compacted backfill material consisting of fine-grained sand, very pale orange (10YR 8/2) with calcium carbonate in matrix. Sand grains are moderately well-sorted, subrounded, unconsolidated, dry.
15	0915	Cuttings	324		SM/CAL	Fine- to medium-grained sand, very pale orange (10YR 8/2) with calcium carbonate in matrix. Sand grains are moderately well-sorted, subrounded, unconsolidated, dry.
20	0920	Cuttings	394			As above.
25	0925	Cuttings	317	256	SW	Fine sand, light brown 5YR 6/4, well-sorted, rounded/subrounded, unconsolidated, damp.
30	0927	Cuttings				Fine sand, light brown 5YR 6/4, well-sorted, rounded/subrounded, unconsolidated, moist. Bottom of boring at 30 ft below ground surface.
35						
40						
45						
50						
55						

3/8 Bentonite Hole Plug

← 5" →

View facing west showing drilling of soil boring B-1





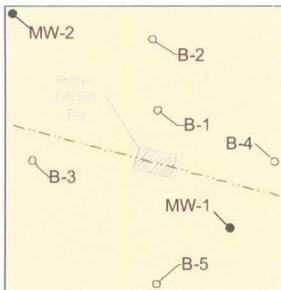
SOIL BORING LITHOLOGIC LOG

BOREHOLE NO.: B-2 TOTAL DEPTH: 25 Feet
 SITE ID: EME Jct. J-1 CLIENT: RICE Operating Company
 CONTRACTOR: Harrison & Cooper, Inc. COUNTY: Lea
 DRILLING METHOD: Air Rotary STATE: New Mexico
 START DATE: 06/02/08 LOCATION: T20S-R37E-Sec 1-Unit J
 COMPLETION DATE: 06/02/08 FIELD REP.: G. Van Deventer
 COMMENTS: Boring located at 25 feet north of former junction box (plate marker)

Depth	Sample		Chloride (ppm)		USCS	LITHOLOGIC DESCRIPTION: LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
	Time	Type	Field	Lab		
		Surface			CAL	Caliche
5	1002	Cuttings	232		SM	Fine- to medium-grained sand, light brown (5YR 6/4) with some caliche. Sand grains are rounded/subrounded, moderately sorted, unconsolidated, dry.
10	1003	Cuttings	621		SM/CAL	Very fine- to fine-grained sand, very pale orange (10YR 8/2) with calcium carbonate in matrix, unconsolidated, dry.
15	1004	Cuttings	653	688		Very fine- to fine-grained sand, very pale orange (10YR 8/2) with calcium carbonate in matrix, unconsolidated, dry.
20	1005	Cuttings	392			As above
					SW	Fine- to medium grained sand, light brown 5YR 6/4, moderately well-sorted, rounded/subrounded, unconsolidated, dry.
25	1007	Cuttings	488	464		As above with higher moisture content.
						Bottom of boring at 30 ft below ground surface.
30						
35						
40						
45						
50						

3/8 Bentonite Hole Plug

← 5" →



SOIL BORING LITHOLOGIC LOG

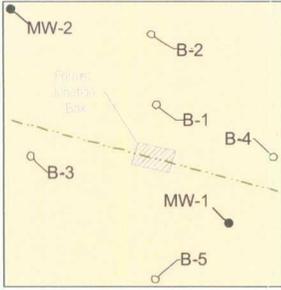
BOREHOLE NO.: B-3 TOTAL DEPTH: 25 Feet
 SITE ID: EME Jct. J-1 CLIENT: RICE Operating Company
 CONTRACTOR: Harrison & Cooper, Inc. COUNTY: Lea
 DRILLING METHOD: Air Rotary STATE: New Mexico
 START DATE: 06/02/08 LOCATION: T20S-R37E-Sec 1-Unit J
 COMPLETION DATE: 06/02/08 FIELD REP.: G. Van Deventer
 COMMENTS: Boring located at 25 feet west of former junction box (plate marker)

Depth	Sample		Chloride (ppm)		USCS	LITHOLOGIC DESCRIPTION: LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
	Time	Type	Field	Lab		
		Surface				
5	1048	Cuttings	205		SM/CAL	Very fine- to fine-grained sand, very pale orange (10YR 8/2) with calcium carbonate in matrix, unconsolidated, dry.
10	1049	Cuttings	475			As above.
15	1050	Cuttings	483		SW	Fine- to medium-grained sand, grayish-orange (10YR 7/4), rounded/subrounded and well-sorted grains, unconsolidated, dry.
20	1055	Cuttings	516	576	SW/CAL	Fine- to medium-grained sand, grayish-orange (10YR 7/4) with hard caliche nodules (pea-sized to 1/2" chunks)
					SW	Fine- to medium grained sand, light brown 5YR 6/4, well-sorted, rounded/subrounded, unconsolidated, dry.
25	1056	Cuttings	408	352		As above with higher moisture content.
						Bottom of boring at 30 ft below ground surface.
30						<p>View facing northeast showing hole plugging at boring B-3.</p>
35						
40						
45						
50						

3/8 Bentonite Hole Plug

← 5" →

SOIL BORING LITHOLOGIC LOG



BOREHOLE NO.: <u>B-4</u>	TOTAL DEPTH: <u>25 Feet</u>
SITE ID: <u>EME Jct. J-1</u>	CLIENT: <u>RICE Operating Company</u>
CONTRACTOR: <u>Harrison & Cooper, Inc.</u>	COUNTY: <u>Lea</u>
DRILLING METHOD: <u>Air Rotary</u>	STATE: <u>New Mexico</u>
START DATE: <u>06/02/08</u>	LOCATION: <u>T20S-R37E-Sec 1-Unit J</u>
COMPLETION DATE: <u>06/02/08</u>	FIELD REP.: <u>G. Van Deventer</u>
COMMENTS: <u>Boring located at 25 feet east of former junction box (plate marker)</u>	

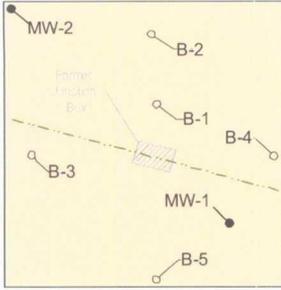
Depth	Sample		Chloride (ppm)		USCS	LITHOLOGIC DESCRIPTION: LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
	Time	Type	Field	Lab		
	1254	Surface				
5	1255	Cuttings	568		SM/CAL	Very fine- to fine-grained sand, very pale orange (10YR 8/2) with calcium carbonate in matrix, unconsolidated, dry.
10	1256	Cuttings	794	848		Very fine- to fine-grained sand, grayish-orange (10YR 7/4) with calcium carbonate in matrix, unconsolidated, dry.
15	1257	Cuttings	543			Fine-grained sand, light brown 5YR 6/4, subrounded and moderately sorted grains, unconsolidated, dry.
20	1258	Cuttings	450		SW	Very fine- to fine-grained sand, grayish-orange (10YR 7/4) with soft caliche in matrix, unconsolidated, dry.
						Fine- to medium grained sand, light brown 5YR 5/6, moderately well-sorted, rounded/subrounded, unconsolidated, dry.
25	1300	Cuttings	479	512		As above with higher moisture content.
						Bottom of boring at 30 ft below ground surface.
30						
35						
40						
45						
50						

3/8 Bentonite Hole Plug

← 5" →

View facing southeast showing drilling of soil boring B-4.





SOIL BORING LITHOLOGIC LOG

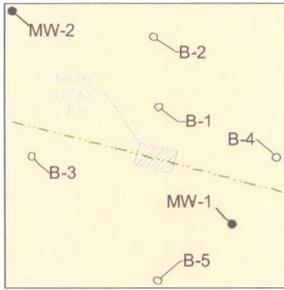
BOREHOLE NO.: B-5 TOTAL DEPTH: 25 Feet
 SITE ID: EME Jct. J-1 CLIENT: RICE Operating Company
 CONTRACTOR: Harrison & Cooper, Inc. COUNTY: Lea
 DRILLING METHOD: Air Rotary STATE: New Mexico
 START DATE: 06/02/08 LOCATION: T20S-R37E-Sec 1-Unit J
 COMPLETION DATE: 06/02/08 FIELD REP.: G. Van Deventer
 COMMENTS: Boring located at 25 feet south of former junction box (plate marker)

Depth	Sample		Chloride (ppm)		USCS	LITHOLOGIC DESCRIPTION: LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
	Time	Type	Field	Lab		
1335		Surface				
5	1336	Cuttings	147		SM/CAL	Very fine- to fine-grained sand, very pale orange (10YR 8/2) with calcium carbonate in matrix, unconsolidated, dry.
10	1337	Cuttings	276		SM/CAL	Very fine- to fine-grained sand, grayish-orange (10YR 7/4) with calcium carbonate in matrix, unconsolidated, dry.
15	1338	Cuttings	476		SM/CAL	Very fine- to fine-grained sand, grayish-orange (10YR 7/4) with calcium carbonate in matrix, unconsolidated, dry.
20	1339	Cuttings	536		SM/CAL	Very fine- to fine-grained sand, grayish-orange (10YR 7/4) with soft caliche in matrix, unconsolidated, dry.
25	1340	Cuttings	780	736	SW	Fine- to medium grained sand, light brown 5YR 5/6, moderately well-sorted, rounded/subrounded, unconsolidated, dry.
						As above with higher moisture content.
						Bottom of boring at 30 ft below ground surface.
						View facing south showing drilling of soil boring B-5
30						
35						
40						
45						
50						

3/8 Bentonite Hole Plug

← 5" →

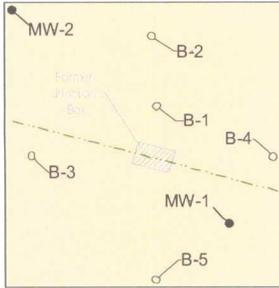
LITHOLOGIC LOG AND MONITORING WELL CONSTRUCTION DIAGRAM



MONITOR WELL NO.: MW-1 TOTAL DEPTH: 40 Feet
 SITE ID: EME Jct. J-1 CLIENT: RICE Operating Company
 CONTRACTOR: Harrison & Cooper, Inc. COUNTY: Lea
 DRILLING METHOD: Air Rotary STATE: New Mexico
 START DATE: 06/02/08 LOCATION: T20S-R37E-Sec 1-Unit J
 COMPLETION DATE: 06/02/08 FIELD REP.: G. Van Deventer
 COMMENTS: Monitoring well located approximately 19 feet southeast of former junction box (marker plate).

Depth	Sample		Chloride (ppm)		USCS	LITHOLOGIC DESCRIPTION: LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
	Time	Type	Field	Lab		
1408		Surface				
5	1409	Cuttings	272		SM/CAL	Very fine- to fine-grained sand, very pale orange (10YR 8/2) with calcium carbonate in matrix, unconsolidated, dry.
10	1410	Cuttings	255		SM/CAL	Very fine- to fine-grained sand, grayish-orange (10YR 7/4) with very pale orange (10YR 8/2) calcium carbonate in matrix, unconsolidated, dry.
15	1411	Cuttings	421		SM/CAL	Very fine- to fine-grained sand, grayish-orange (10YR 7/4) with calcium carbonate in matrix, unconsolidated, dry.
20	1412	Cuttings	561		SM/CAL	Fine-grained sand, grayish-orange (10YR 7/4) moderately sorted, subrounded/rounded, unconsolidated, dry.
25	1415	Cuttings	676	656	SW	Fine- to medium grained sand, light brown 5YR 5/6, moderately well-sorted, rounded/subrounded, unconsolidated, dry.
30	1417				SW	Fine and medium-grained sand, light brown (5 YR 6/4), moderately well-sorted, subrounded, unconsolidated, damp.
35	1420				SW	Fine and medium-grained sand, light brown (5 YR 6/4), moderately well-sorted, subrounded, unconsolidated, very moist.
40	1430				SW	Fine and medium-grained sand, light brown (5 YR 6/4), moderately well-sorted, subrounded, unconsolidated, wet.
						Bottom of boring at 40 ft below ground surface.
						View facing west showing completed monitoring well MW-1
45						
50						
55						
60						

LITHOLOGIC LOG AND MONITORING WELL CONSTRUCTION DIAGRAM



MONITOR WELL NO.: <u>MW-2</u>	TOTAL DEPTH: <u>40 Feet</u>
SITE ID: <u>EME Jct. J-1</u>	CLIENT: <u>RICE Operating Company</u>
CONTRACTOR: <u>Harrison & Cooper, Inc.</u>	COUNTY: <u>Lea</u>
DRILLING METHOD: <u>Air Rotary</u>	STATE: <u>New Mexico</u>
START DATE: <u>06/02/08</u>	LOCATION: <u>T20S-R37E-Sec 1-Unit J</u>
COMPLETION DATE: <u>06/02/08</u>	FIELD REP.: <u>G. Van Deventer</u>
COMMENTS: <u>Monitoring well located approximately 43 feet northwest of former junction box (marker plate).</u>	

	Depth	Sample		Chloride (ppm)		USCS	LITHOLOGIC DESCRIPTION: LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
		Time	Type	Field	Lab		
	1525	Surface					
Cement	5	1526	Cuttings	282			Very fine- to fine-grained sand, light brown (5YR 6/4) and grayish-orange (10YR 7/4) with calcium carbonate in matrix, unconsolidated, dry.
3/8" Bentonite Hole Plug	10	1527	Cuttings	724	960	SM/CAL	Very fine- to fine-grained sand, grayish-orange (10YR 7/4) with calcium carbonate in matrix, unconsolidated, dry.
2" Sched 40 PVC Blank Casing	15	1528	Cuttings	497			Very fine- to fine-grained sand, grayish-orange (10YR 7/4) with calcium carbonate in matrix, unconsolidated, dry.
3/8" Bentonite Hole Plug	20	1529	Cuttings	423			Very fine- to fine-grained sand, grayish-orange (10YR 7/4) with calcium carbonate in matrix, unconsolidated, dry.
20/40 Brady Silica Sand Pack	25	1532	Cuttings	348	336		Fine- to medium grained sand, light brown 5YR 5/6, moderately well-sorted, rounded/subrounded, unconsolidated, dry.
2" Diameter Screen with 0.010" Slots	30	1535				SW	Fine and medium-grained sand, light brown (5 YR 6/4), moderately well-sorted, subrounded, unconsolidated, damp.
20/40 Brady Silica Sand Pack	35	1537					Fine and medium-grained sand, light brown (5 YR 6/4), moderately well-sorted, subrounded, unconsolidated, very moist.
5"	40	1540					Fine and medium-grained sand, light brown (5 YR 6/4), moderately well-sorted, subrounded, unconsolidated, wet.
							Bottom of boring at 40 ft below ground surface.
	45						View facing southeast showing completed monitoring well MW-2 (foreground) and MW-1 (background).
	50						
	55						
	60						

Attachment C

Laboratory Analytical Reports

and

Chain of Custody Documentation



ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: HACK CONDER
122 WEST TAYLOR
HOBBS, NM 88240
FAX TO: (575) 397-1471

Receiving Date: 06/18/08
Reporting Date: 06/18/08
Project Number: NOT GIVEN
Project Name: EME JCT. J-1
Project Location: EME JCT. J-1

Analysis Date: 06/18/08
Sampling Date: 06/02/08
Sample Type: SOIL
Sample Received: COOL & INTACT
Sample Received By: ML
Analyzed By: KS

LAB NO.	SAMPLE ID	Cl ⁻ (mg/kg)
H15006-1	SB #4 @ 25'	512
H15006-2	SB #2 @ 15'	688
H15006-3	SB #2 @ 25'	464
H15006-4	SB #3 @ 20'	576
H15006-5	SB #4 @ 10'	848
H15006-6	SB #5 @ 25'	736
H15006-7	MW #2 @ 10'	960
H15006-8	MW #2 @ 25'	336
Quality Control		500
True Value QC		500
% Recovery		100
Relative Percent Difference		< 0.1

METHOD: Standard Methods 4500-Cl⁻B

Note: Analyses performed on 1:4 w:v aqueous extracts.

Kristin Apredo
Chemist

06/18/08
Date

H15006 RICE

ARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603
 (505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

BILL TO		ANALYSIS REQUEST									
Company Name: Rice Operating Company		P.O. #:									
Project Manager: Hack Conder		Company:									
Address: 122 West Taylor		Attn:									
City: Hobbs		Address:									
Phone #: 393-9174		City:									
Fax #: 397-1471		State:									
Project Owner:		Phone #:									
Project Name: EME jct. J-1		Fax #:									
Project Location: EME jct. J-1											
Sampler Name: Lara Weinheimer/Darnell Mitchell											
FOR LAB USE ONLY											
Lab I.D.	Sample I.D.	# CONTAINERS	MATRIX			PRESERV	DATE	TIME	ANALYSIS REQUEST		
			GROUNDWATER	WASTEWATER	SOIL				SLUDGE	OTHER:	OTHER:
H15006-1	SB #1 @ 25'	6	✓	✓	✓	✓	1:00	6-2-08	✓		
-2	SB #2 @ 15'	6	✓	✓	✓	✓	10:04	6-2-08	✓		
-3	SB #2 @ 25'	6	✓	✓	✓	✓	10:07	6-2-08	✓		
-4	SB #3 @ 20'	6	✓	✓	✓	✓	10:52	6-2-08	✓		
-5	SB #4 @ 10'	6	✓	✓	✓	✓	12:56	6-2-08	✓		
-6	SB #5 @ 25'	6	✓	✓	✓	✓	1:40	6-2-08	✓		
-7	MW #2 @ 10'	6	✓	✓	✓	✓	3:27	6-2-08	✓		
-8	MW #2 @ 25'	6	✓	✓	✓	✓	3:31	6-2-08	✓		

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising hereunder based in contract or tort, shall be limited to the amount paid by the client for the analysis. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By:	Date: 6-18-08	Received By:	Date: 6-18-08
Relinquished By: C. Weinheimer	Time: 10:05	Received By:	Time:
Delivered By: (Circle One)	Sample Condition	Checked By:	Checked By: (Initials)
Sampler - UPS - Bus - Other:	Cool <input type="checkbox"/> Intact <input type="checkbox"/>		
	Yes <input type="checkbox"/> No <input type="checkbox"/>		
	Yes <input type="checkbox"/> No <input type="checkbox"/>		

Phone Result: Yes No Add'l Phone #: _____
 Fax Result: Yes No Add'l Fax #: _____
 REMARKS: email results
 Hconder@riceswd.com; jpurvis@riceswd.com;
 Lweinheimer@rice.swd.com

*Lara needs samples returned



ANALYTICAL RESULTS FOR
 RICE OPERATING COMPANY
 ATTN: HACK CONDER
 122 W. TAYLOR STREET
 HOBBS, NM 88240
 FAX TO: (575) 397-1471

Receiving Date: 06/24/08
 Reporting Date: 06/26/08
 Project Number: NOT GIVEN
 Project Name: EME JUNCTION J-1
 Project Location: T20S-R36E-SEC1 J-LEA COUNTY, NM

Sampling Date: 06/24/08
 Sample Type: WATER
 Sample Condition: COOL & INTACT
 Sample Received By: CK
 Analyzed By: HM/KS

LAB NUMBER	SAMPLE ID	Na (mg/L)	Ca (mg/L)	Mg (mg/L)	K (mg/L)	Conductivity (uS/cm)	T-Alkalinity (mgCaCO ₃ /L)
ANALYSIS DATE:		06/26/08	06/26/08	06/26/08	06/26/08	06/25/08	06/25/08
H15049-1	MONITOR WELL #1	1,980	1,020	510	12.5	15,600	200
H15049-2	MONITOR WELL #2	2,170	1,080	510	13.1	16,400	236
Quality Control		NR	52.1	51.0	2.96	1,418	NR
True Value QC		NR	50.0	50.0	3.00	1,413	NR
% Recovery		NR	104	102	98.7	100	NR
Relative Percent Difference		NR	8.0	< 0.1	1.3	1.1	NR

METHODS: SM3500-Ca-D 3500-Mg E 8049 120.1 310.1

LAB NUMBER	SAMPLE ID	Cl (mg/L)	SO ₄ (mg/L)	CO ₃ (mg/L)	HCO ₃ (mg/L)	pH (s.u.)	TDS (mg/L)
ANALYSIS DATE:		06/25/08	06/26/08	06/25/08	06/25/08	06/25/08	06/24/08
H15049-1	MONITOR WELL #1	5,200	1,390	0	244	6.92	13,300
H15049-2	MONITOR WELL #2	5,500	1,480	0	288	6.88	14,400
Quality Control		510	41.8	NR	988	7.05	NR
True Value QC		500	40.0	NR	1000	7.00	NR
% Recovery		102	105	NR	98.8	101	NR
Relative Percent Difference		2.0	0.6	NR	1.2	0.3	NR

METHODS: SM4500-Cl-B 375.4 310.1 310.1 150.1 160.1

Chemist

Date



ARDINAL LABORATORIES

PHOENIX, AZ • THE DALYNS • HOBBS, NM

ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: HACK CONDER
122 W. TAYLOR STREET
HOBBS, NM 88240
FAX TO: (575) 397-1471

Receiving Date: 06/24/08
Reporting Date: 06/26/08
Project Number: NOT GIVEN
Project Name: EME JUNCTION J-1
Project Location: T20S-R36E-SEC 1 J-LEA COUNTY, NM

Sampling Date: 06/24/08
Sample Type: WATER
Sample Condition: COOL & INTACT
Sample Received By: CK
Analyzed By: HM/KS

LAB NUMBER	SAMPLE ID	Na (mg/L)	Ca (mg/L)	Mg (mg/L)	K (mg/L)	Conductivity (μ S/cm)	T-Alkalinity (mgCaCO ₃ /L)
ANALYSIS DATE:		06/26/08	06/26/08	06/26/08	06/26/08	06/25/08	06/25/08
H15049-1	MONITOR WELL #1	1,980	1,020	510	12.5	15,600	200
H15049-2	MONITOR WELL #2	2,170	1,080	510	13.1	16,400	236

Quality Control	NR	52.1	51.0	2.96	1.418	NR
True Value QC	NR	50.0	50.0	3.00	1.413	NR
% Recovery	NR	104	102	98.7	100	NR
Relative Percent Difference	NR	3.0	< 0.1	1.3	1.1	NR

METHODS: SM3500-Ca-D 3500-Mg E 8049 120.1 310.1

	Cl (mg/L)	SO ₄ (mg/L)	CO ₃ (mg/L)	HCO ₃ (mg/L)	pH (s.u.)	TDS (mg/L)	
ANALYSIS DATE:		06/25/08	06/26/08	06/25/08	06/25/08	06/24/08	
H15049-1	MONITOR WELL #1	5,200	1,390	0	244	6.92	13,300
H15049-2	MONITOR WELL #2	5,500	1,480	0	288	6.88	14,400

Quality Control	510	41.8	NR	988	7.05	NR
True Value QC	500	40.0	NR	1000	7.00	NR
% Recovery	102	105	NR	98.8	101	NR
Relative Percent Difference	2.0	0.6	NR	1.2	0.3	NR

METHODS: SM4500-Cl-B 375.4 310.1 310.1 150.1 160.1

Chemist

Date



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

ANALYTICAL RESULTS FOR
 RICE OPERATING COMPANY
 ATTN: HACK CONDER
 122 W. TAYLOR ST.
 HOBBS, NM 88240
 FAX TO: (575) 397-1471

Receiving Date: 06/24/08
 Reporting Date: 06/30/08
 Project Number: NOT GIVEN
 Project Name: EME JUNCTION J-1
 Project Location: T20S-R36E-SEC1 J ~ LEA CO., NM

Sampling Date: 06/24/08
 Sample Type: WATER
 Sample Condition: COOL & INTACT
 Sample Received By: CK
 Analyzed By: CK

LAB NUMBER	SAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE:		06/27/08	06/27/08	06/27/08	06/27/08
H15049-1	MONITOR WELL #1	0.072	0.014	<0.002	<0.006
H15049-2	MONITOR WELL #2	0.017	0.004	<0.002	<0.006
Quality Control		0.051	0.043	0.045	0.139
True Value QC		0.050	0.050	0.050	0.150
% Recovery		102	85.6	90.7	92.7
Relative Percent Difference		3.8	5.0	6.2	6.9

METHOD: EPA SW-846 8260B

 Chemist

 Date

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ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: HACK CONDER
122 W. TAYLOR STREET
HOBBS, NM 88240
FAX TO: (575) 397-1471

Sampling Date: 08/15/08
Sample Type: WATER
Sample Condition: COOL & INTACT
Sample Received By: ML
Analyzed By: HM/TR

Receiving Date: 08/15/08
Reporting Date: 08/25/08
Project Number: NOT GIVEN
Project Name: EME JUNCTION J-1
Project Location: T205-R36E-SEC 1 J ~ LEA COUNTY, NM

LAB NUMBER	SAMPLE ID	Na (mg/L)	Ca (mg/L)	Mg (mg/L)	K (mg/L)	Conductivity (uS/cm)	T-Alkalinity (mgCaCO ₃ /L)
ANALYSIS DATE:		08/20/08	08/20/08	08/20/08	08/20/08	08/19/08	08/19/08
H15748-1	MONITOR WELL #1	2,130	1,040	486	14.6	15,500	240
H15748-2	MONITOR WELL #2	2,640	1,040	510	14.6	15,900	272
Quality Control		NR	48.1	48.1	3.00	1,391	NR
True Value QC		NR	50.0	50.0	3.00	1,413	NR
% Recovery		NR	96.2	96.2	98.5	98.4	NR
Relative Percent Difference		NR	8.0	5.9	6.9	1.4	NR

METHODS: SM3500-Ca-D 3500-Mg E 8049 120.1 310.1

	Cl (mg/L)	SO ₄ (mg/L)	CO ₃ (mg/L)	HCO ₃ (mg/L)	pH (s.u.)	TDS (mg/L)	
ANALYSIS DATE:		08/19/08	08/19/08	08/19/08	08/19/08	08/19/08	
H15748-1	MONITOR WELL #1	5,200	1,630	0	293	6.23	12,100
H15748-2	MONITOR WELL #2	5,900	1,810	0	332	6.57	12,500
Quality Control		510	43.9	NR	976	7.05	NR
True Value QC		500	40.0	NR	1000	7.00	NR
% Recovery		102	110	NR	97.6	101	NR
Relative Percent Difference		2.0	2.4	NR	2.5	0.7	NR

METHODS: SM4500-Cl-B 375.4 310.1 310.1 150.1 160.1

Chemist

Date



ANALYTICAL RESULTS FOR:
 RICE OPERATING COMPANY
 ATTN: HACK CONDER
 122 W. TAYLOR STREET
 HOBBS, NM 88240
 FAX TO: (575) 397-1471

Receiving Date: 11/19/08
 Reporting Date: 11/24/08
 Project Number: NOT GIVEN
 Project Name: EME JUNCTION J-1
 Project Location: T20S-R36E-SEC1 J - LEA CO., NM

Sampling Date: 11/18/08
 Sample Type: WATER
 Sample Condition: COOL & INTACT
 Sample Received By: ML
 Analyzed By: HM/TR

LAB NUMBER	SAMPLE ID	Na (mg/L)	Ca (mg/L)	Mg (mg/L)	K (mg/L)	Conductivity (μ S/cm)	T-Alkalinity (mgCaCO ₃ /L)
ANALYSIS DATE:		11/24/08	11/21/08	11/24/08	11/21/08	11/20/08	11/20/08
H16358-1	MONITOR WELL #1	2.220	1.060	474	14.8	13.100	256
H16358-2	MONITOR WELL #2	2.190	1.100	510	14.4	13.300	280

Quality Control	NR	48.1	48.6	2.77	1.430	NR
True Value QC	NR	50.0	50.0	3.00	1.413	NR
% Recovery	NR	96.2	97.2	92.4	101	NR
Relative Percent Difference	NR	8.0	<0.1	10.3	0.1	NR

METHODS: SM3500-Ca-D 3500-Mg E 8049 120.1 310.1

	Cl (mg/L)	SO ₄ (mg/L)	CO ₃ (mg/L)	HCO ₃ (mg/L)	pH (s.u.)	TDS (mg/L)	
ANALYSIS DATE:	11/21/08	11/21/08	11/20/08	11/20/08	11/20/08	11/19/08	
H16358-1	MONITOR WELL #1	5.350	1.590	0	312	6.79	11.600
H16358-2	MONITOR WELL #2	5.450	1.600	0	342	6.77	12.200

Quality Control	500	45.6	NR	1000	7.02	NR
True Value QC	500	40.0	NR	1000	7.00	NR
% Recovery	100	114	NR	100	100	NR
Relative Percent Difference	<0.1	1.6	NR	<0.1	0.1	NR

METHODS: SM4500-Cl-B 375.4 310.1 310.1 150.1 160.1

Chemist

Date



ARDINAL LABORATORIES

PHONE: (575) 397-1471 • 1107 MARLBOROUGH • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: HACK CONDER
122 W. TAYLOR
HOBBS, NM 88240
FAX TO: (575) 397-1471

Receiving Date: 11/19/08
Reporting Date: 11/26/08
Project Number: NOT GIVEN
Project Name: EME JUNCTION J-1
Project Location: T20S-R36E-SECT J- LEA CO., NM

Sampling Date: 11/19/08
Sample Type: WATER
Sample Condition: COOL & INTACT
Sample Received By: ML
Analyzed By: ZL

LAB NUMBER	SAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE					
		11/25/08	11/25/08	11/25/08	11/25/08
H16358-1	MONITOR WELL #1	<0.001	<0.001	<0.001	<0.003
H16358-2	MONITOR WELL #2	<0.001	<0.001	<0.001	<0.003

Quality Control	0.060	0.049	0.055	0.151
True Value QC	0.050	0.050	0.050	0.150
% Recovery	120	98.0	110	101
Relative Percent Difference	3.4	2.1	1.2	3.0

METHOD: EPA SW-846 8260B

TEXAS NELAP CERTIFICATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE AND TOTAL XYLENES.

Chemist

Date



ANALYSIS RESULT UNDER
 RICE OPERATIONS COMPANY
 4170 HATCH COOKS RD
 CLYDE, TENNESSEE 37033
 H1888-AD000040
 PART ID: 370187-1671

Sampling Date: 02/14/00
 Reporting Date: 02/21/00
 Project Number: 30101001
 Project Name: 30101001 -
 Project Location: 7203-R-RE-SECTION 4 - LEA CO - TN

Sampling Date: 02/14/00
 Sample Type: WATER
 Sample Condition: COOL & FRESH
 Sample Received By: JG
 Analyzed By: HM/TR

LAB NAME/SAMPLE ID	Ca (mg/L)	Mg (mg/L)	Fe (mg/L)	NO ₃ -N (mg/L)	Conductivity (µS/cm)	Total Hardness (mg/L)
ANALYSIS DATE	02/20/00	02/20/00	02/20/00	02/14/00	02/20/00	02/20/00
H1888-01 MONITOR WELL #1	1.170	1.280	480	1.8	14.700	2.45
H1888-02 MONITOR WELL #2	1.170	1.130	800	1.8	15.200	2.35

Quality Control	NR	46.1	61.0	3.80	1.42	NR
True Value CC	NR	30.0	30.0	3.00	1.40	NR
% Recovery	NR	98.7	100	93.3	101	NR
Relative Percent Difference	NR	50.1	50.1	4.2	0.4	NR

METHODS: Ca: 810500-Ca-D; Mg: 10500-03 E; Fe: 3045; NO₃-N: 100.1

	Cl (mg/L)	SO ₄ (mg/L)	CO ₃ (mg/L)	HCO ₃ (mg/L)	pH	TDS (mg/L)
ANALYSIS DATE	02/19/00	02/19/00	02/19/00	02/19/00	02/19/00	02/19/00
H1888-01 MONITOR WELL #1	2.100	1.180	1	107	7.39	10.270
H1888-02 MONITOR WELL #2	2.500	1.640	1	107	7.39	10.850

Quality Control	500	41.7	1.8	1000	7.60	NR
True Value CC	500	40.0	NR	1000	7.00	NR
% Recovery	100	102	NR	100	100	NR
Relative Percent Difference	0.0	4.2	NR	0.0	0.4	NR

METHODS: Cl: 801000-Cl-B; SO₄: 375.4; CO₃: 100.1; HCO₃: 100.1; pH: 15.1

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ARDINAL LABORATORIES

2100 W. UNIVERSITY BLVD. SUITE 100 • HOBBES, NM 88240

ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
ATTN: HACK CONDER
122 W. TAYLOR
HOBBES, NM 88240
FAX TO: (575) 397-1471

Receiving Date: 06/05/09	Sampling Date: 06/03/09
Reporting Date: 06/09/09	Sample Type: WATER
Project Number: NOT GIVEN	Sample Condition: COOL & INTACT
Project Name: EME JUNCTION J-1	Sample Received By: ML
Project Location: T20S-R36E-SEC1 J- LEA CO. NM	Analyzed By: ZL

LAB NUMBER	SAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE		06/08/09	06/08/09	06/08/09	06/08/09
HI 7566-1	MONITOR WELL #1	<0.001	<0.001	<0.001	<0.003
HI 7566-2	MONITOR WELL #2	<0.001	<0.001	<0.001	<0.003

Quality Control	0.050	0.050	0.049	0.148
True Value QC	0.050	0.050	0.050	0.150
% Recovery	116	106	98.0	98.7
Relative Percent Difference	3.7	9.7	8.5	5.8

METHOD: EPA SW-846 8021 B

TEXAS NELAP ACCREDITATION T104704396-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE,
AND TOTAL XYLENES

Chemist

Date

Attachment D

Input and Results of the AMIGO Simulation

INPUT AND RESULTS OF THE AMIGO SIMULATION

The AMIGO program, developed for the American Petroleum Institute (API), was used to simulate the potential impact to groundwater due to chloride transport through the vadose zone. The input to the model employed all available field data collected from the site. Model input data that was not site-specific was conservatively estimated based on professional judgment, referenced publications, and interpolation of known data from nearby sites. The specific parameters used in the simulation at the EME Jet J-1 site are listed in the table below.

Table 1: AMIGO Input Parameters

Model Parameter	Value	Source of Value
Climate (non-smoothed)	1946 - 1992	Pearl, NM Station
Distance (ft) to potential receptor (water well)	NA	No water well within 1000 ft of site (NMOSE & USGS Databases)
Background Chloride Concentration in Aquifer (mg/L)	5,200	Lowest concentration measured on site (upgradient-offsite source)
Aquifer Porosity (unitless)	0.25	Sample description
Depth to Groundwater (ft below ground surface)	30	Measured on site
Aquifer Thickness (ft)	30	Nicholson & Clebsch (1961) and interpolated from nearby sites
Slope of Water Table	0.001	Measured on site
Hydraulic Conductivity (ft/d)	10	Professional Judgment (based on aquifer tests conducted by Trident in Lea County)
Longitudinal Dispersivity (unitless)	10	Professional Judgment Conservative Assumption
Transverse Dispersivity (unitless)	1	Professional Judgment Conservative Assumption
Average Chloride Load (kg/m ²)	5.03	Calculated from site data using Massload spreadsheet
Maximum Length of Spill in Direction of Groundwater Flow (ft)	30	Site Data (conservatively used length and width of excavation)
Plant Uptake Trigger (%)	1	Professional Judgment Conservative Assumption
Surface Layer Lithology	Med. Sand	Lithology of on site soil borings
Soil Profile at Depth (Ratio - Caliche : Medium Sand)	1 : 5	Lithology of on site soil borings

It is important to note that the background chloride concentration of 5,200 mg/L (lowest concentration observed at monitoring well MW-1) was used due to the strong likelihood of an unknown, upgradient, offsite source causing the impairment at the site. Offsite encroachment of chlorides in groundwater at the site is clearly evidenced by the consistently higher chloride and

TDS concentrations in the upgradient monitoring well (MW-2) located 64 feet northwest of MW-1. Chloride and TDS concentrations are known to be elevated on a regional scale in this area near Monument.

The caliche and medium sand (1:5 ratio) soil types used in the simulation are consistent with those described in the lithologic logs for each soil boring and monitoring well. An additional conservative measure taken was in not accounting for the presence of the very low-permeability clay barrier installed at 6 ft bgs into the model simulation.

Published values of hydraulic conductivity range from 2 ft/day to 200 ft/day in Lea County. A conservative value of 10 ft/day for hydraulic conductivity was used based on experience of Trident Environmental in conducting aquifer tests in Lea County at sites with similar lithology and hydrogeologic characteristics. Dispersivity is a scale-dependent parameter which is generally larger as the scale of the plume increases. Longitudinal dispersivity represents the spreading of the plume in the direction of groundwater flow and the transverse component represents spreading perpendicular to the flow direction. A typical rule of thumb is that the longitudinal dispersivity is 10 percent of the length of the plume (National Research Council, 1990). However, values of dispersivity reported in the literature range generally from 1 to 100 percent of the problem scale (Gelhar, 1986). Usually, the longitudinal dispersivity is 5 to 10 times higher than transverse. Dispersivity terms do not have a significant impact to the AMIGO simulations. A conservative value of 10 was used for longitudinal dispersivity and a value of 1 for the transverse component.

The *Massload* spreadsheet which compliments the AMIGO modeling simulation tool was used to calculate the potential chloride load in the vadose zone that could potentially contribute to the chlorides already present in groundwater. This was accomplished by inputting the field chloride analyses for each depth sampled in the vadose zone from the five soil borings (B-1 through B-5), two monitoring wells (MW-1 and MW-2), and three trenches (located 15 feet north, east and south of the former junction box where the higher chloride concentrations were observed). With each sample point weighted equally, the chloride load was calculated to be 5.03 kg/m² as shown in Table 2.

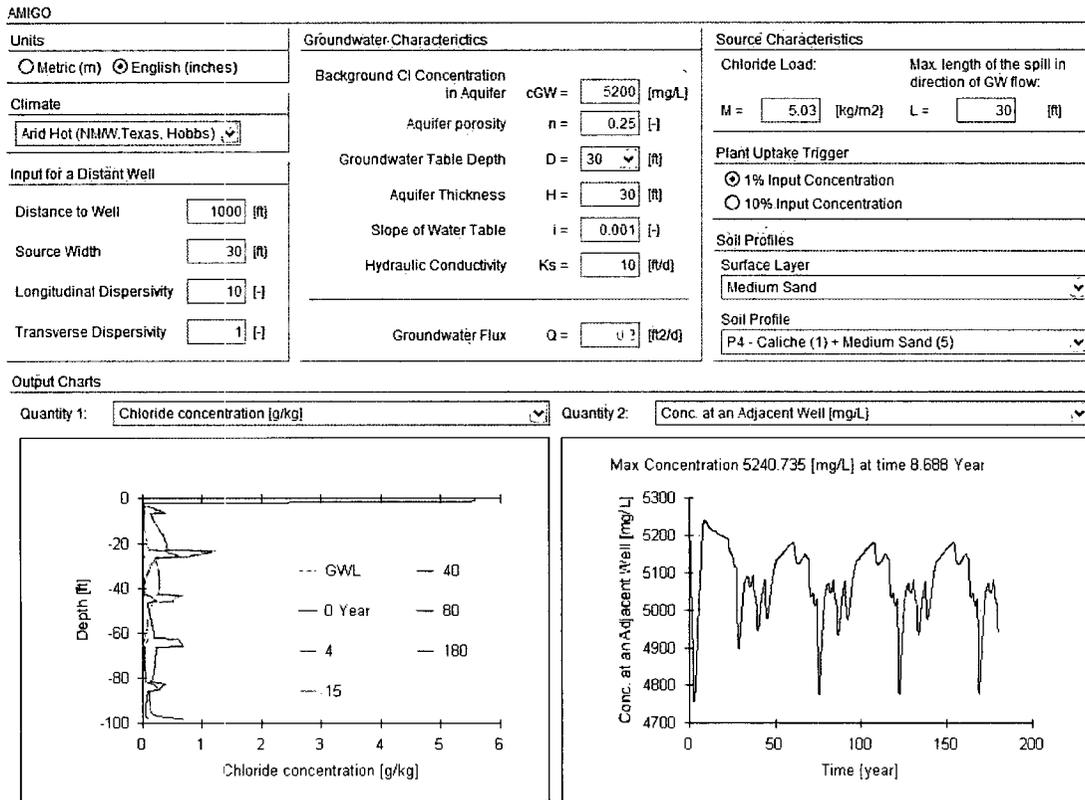
Table 2: AMIGO Input Parameters

Soil Boring, Monitoring Well, or Trench Location	Proportional Area Weights	Chl. Load of each Borehole	Equal Area Weights
B-1	0.10	5.95	1.00
B-2	0.10	2.40	1.00
B-3	0.10	4.88	1.00
B-4	0.10	7.14	1.00
B-5	0.10	1.54	1.00
MW-1	0.10	5.00	1.00
MW-2	0.10	5.45	1.00
15-ft East of Jct Box	0.10	5.68	1.00
15-North of Jct Box	0.10	6.03	1.00
15-ft South of Jct Box	0.10	6.20	1.00
Sum of weights	1		10

Averaged Chloride Load of All Boreholes: 5.03 kg/m²

Input of the data described above resulted in the simulation as depicted in Figure 1 below which includes the AMIGO groundwater output charts copied directly from the model results screen.

Figure 1: AMIGO Output Charts



The results of the simulation indicate that the chloride mass within the vadose zone will not contribute more than 41 mg/L in the groundwater below the site, if no further corrective actions are taken.

The simulated concentration in groundwater is a *worst-case* prediction because of the conservative input parameters used in the model. The above-described AMIGO simulation supports the conclusion that the chlorides in the vadose zone do not represent a threat to human health and the environment.