

1R - 428 - SP

WORKPLANS

Date:

6-8-10

R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266.0745

June 8, 2010

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

**RE: Rice Operating Company, Hobbs SWD System A-6 Vent Site: T-19-S, R-38-E,
Section 6, Unit A, Lea County, New Mexico, (NMOCD CASE #1R428-59),
Corrective Action Plan**

Mr. Hansen:

On behalf of Rice Operating Company (ROC), R.T. Hicks Consultants, Ltd. is submitting this Corrective Action Plan for the Hobbs A-6 Vent site. The investigation demonstrates that residual salt and hydrocarbons in the vadose zone will not with reasonable probability contaminate ground water or surface water, in excess of the standards in Subsections B and C of 19.15.30.9 NMAC through leaching, percolation or other transport mechanisms, or as the water table elevation fluctuates. A monitoring well located as close as possible to the former Vent site (about 85-feet down gradient) shows no evidence of ground water impairment. Revegetation of the site, our recommended corrective action, meets the mandate of NMOCD Rules for protection of surface water and the environment.

Background

The Hobbs A-6 Vent is located west of the city of Hobbs, New Mexico at T-19-S, R-38-E, Section 6, in Unit A. The NMOCD-approved Investigation Characterization Plan (ICP), dated April 4, 2008 (Attachment A) includes background information, a site vicinity map, and a regional ground water gradient map for this and six other nearby ROC sites.

Field Programs

As a part of the approved ICP, ROC installed and sampled five 10-foot deep backhoe trenches on July 31 and August 1, 2008 to delineate the vertical and horizontal extent of hydrocarbons and chloride in the soil. See Plate 1 for a summary map that includes results of the field chloride analyses and hydrocarbon screening data as well as a laboratory report for the soil samples used to verify the ROC field data.

Hicks Consultants supervised a deep soil and ground water sampling program to further delineate the extent and magnitude of media impact. On October 23, 2008, soil boring No. 1 (SB-1) was drilled adjacent to the center excavation to a depth of 49 feet. A down gradient monitoring well (MW-1) was installed on March 3, 2009 to evaluate the ground water conditions. ROC conducted field analysis of soil samples for chloride and volatile hydrocarbon vapors for both boring programs. Attachment B provides soil lithology logs which include the field chloride and hydrocarbon screening data and laboratory results.

June 8, 2010

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MW-1 was developed on March 17, 2009 by pumping 36 gallons (12 well volumes) and ground water samples were recovered on March 31, as well as in June, September, and November of 2009. Attachment C provides the laboratory report and chain of custody documents for the soil boring and monitoring well sampling events.

MW-1 was installed as close as possible to the source area and approximately 50 feet further down gradient than proposed in the ICP. The operator of the nearby CO₂ gas pipeline would not provide clearance to the New Mexico One-Call program for a proposed monitoring well location within 30 feet of the pipeline right-of-way.

Results

The initial ROC assessment showed the highest chloride concentration (784 mg/kg) nine feet below the surface at the original vent location. The trenching shows that the horizontal extent of the chloride-impacted soil is less than 2,500 ft². Data from the 49-foot deep soil boring near the source area indicate that the maximum chloride concentrations (approximately 1,000 mg/kg) exist from 20 to 35 feet below the surface and decrease with depth from this point to ground water. At 40-42 feet below grade, laboratory chloride concentration was 656 mg/kg.

Field screening of hydrocarbon vapors in the soil identified concentrations greater than 1,000 ppm in center, west, and south excavations. Laboratory analysis of BTEX show maximum concentrations of benzene (0.4 mg/kg), toluene (0.329 mg/kg), ethylbenzene (24.5 mg/kg), and total xylenes (41.1 mg/kg) at 9 to 10 feet below the surface. The highest soil sample PID reading (3,738 ppm) and the highest benzene concentration (2.78 mg/kg) are in SB-1 at 40 to 42 feet below the surface, which is just above a hard sandstone formation. In SB-1, laboratory concentrations of regulated constituents show total BTEX is 17.8 mg/kg at 25 feet below grade and 63.1 mg/kg at 40-42 feet below grade.

A summary of the laboratory results from all of the soil sampling events are provided on Table 1 below. Plate 1 is a site map that shows the location of the soil boring and monitoring well relative to the initial excavations and provides the results of the field screening and laboratory data.

Table 1
Rice Operating Hobbs A-6 Vent Site
Laboratory Data - Soil Samples

Sample Location	Depth (feet)	Sample Date	PID (ppm)	Chloride (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	BTEX (mg/kg)
Center	9	7/31/08	1,091	784	<0.2	0.288	24.5	41.1	66.1
Center	10	7/31/08	932	368	<0.2	0.264	20.1	26.3	46.9
5-Ft North	3	7/31/08	56.2	160	--	--	--	--	--
	10	7/31/08	943	<16	0.4	<0.2	18.0	7.7	26.3
5-Ft East	5	7/31/08	630	400	<0.2	<0.2	<0.2	0.9	1.5
	10	7/31/08	917	336	<0.1	<0.1	<0.1	<0.3	0.6
5-Ft West	10	8/1/08	1,355	464	<0.2	0.329	16.4	27.1	44.0
5-Ft South	10	8/1/08	781	560	<0.2	0.271	2.89	15.3	18.7
SB-1	25	10/23/08	332	1,150	0.101	1.47	3.69	12.5	17.8
	40-42	10/23/08	3,738	656	2.78	3.26	12.4	44.7	63.1
MW-1	20	3/3/09	0.3	<16	--	--	--	--	--
	45-47	3/3/09	0.1	<16	--	--	--	--	--

Elevated chloride and hydrocarbon values based on field screening were not present in the soil from MW-1. Ground water sampling at MW-1 are equivalent to natural background conditions with respect to chloride and hydrocarbons (See Plate 1).

Simulation Modeling

We used the AMIGO tool (HYDRUS-1D model) to determine if un-saturated chloride transport through the vadose zone would cause the underlying ground water to exceed 250 mg/L chloride in the future. The input to the model employed field data from the site, nearby locations, and conservative input data for parameters that were not measured at or near the site.

In the absence of any corrective action by ROC, the simulation indicates that a maximum ground water chloride concentration of 233 mg/L will occur in the year 2037 (28 years from the sample date). Attachment D provides an explanation of the data used and results from the simulation at the Hobbs A-6 Vent site.

We used the VLEACH vadose zone model to determine if the benzene identified during the site assessment would cause the underlying ground water to exceed the regulatory standard. This modeling used benzene as a surrogate for all regulated hydrocarbons because past experience demonstrates that this constituent is not only the most mobile in the vadose zone but also has the lowest acceptable concentration limits in ground water. The input to the model employed field data from the site, nearby locations, and conservative default values for parameters that were not measured at or near the site.

The results of the simulation indicate that a maximum ground water benzene concentration of 0.003 mg/L could be (or has been) present immediately below the source area. Our evaluation of the shape of the simulation curve suggests that the benzene concentration in the ground water may have been higher in the past directly below the former vent, but any mass input was not sufficient to cause detection in the down gradient monitoring well. Four quarters of ground water monitoring show no detectable levels of benzene.

VLEACH is conservative of ground water quality because the model does not take into account the natural biological degradation of the hydrocarbons. Attachment D provides an explanation of the data used and results from the simulation at the Hobbs A-6 Vent site. A detailed description of the model and a free windows-based program download is available from the USEPA at <http://www.epa.gov/ada/csmos/models/vleach.html>.

Recommendations

The site data that documents the residual mass of salt and hydrocarbons in the vadose zone permit a conclusion that these constituents in the vadose zone will not with reasonable probability contaminate ground water or surface water, in excess of the standards in Subsection B and C of the 19.15.30.9 NMAC, through leaching, percolation or other transport mechanisms, or as the water table elevation fluctuates.

Our recommended corrective action for the site is re-vegetation of the ground surface to limit infiltration of precipitation and the subsequent migration of constituents of concern to ground

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water. Upon documentation of re-seeding with an appropriate mix of native grasses we will submit a Termination Request for this site's regulatory file.

As four quarters of ground water sampling events at the down gradient monitoring well (MW-1) show no hydrocarbons above detection limits or chloride concentrations above WQCC Standards, ROC will plug and abandon this monitoring well after notification to NMOCD.

Please contact Hack Conder of ROC at 575-393-9174 if you have any questions concerning this submission. Thank you for your time and consideration.

Sincerely,
R.T Hicks Consultants, Ltd.

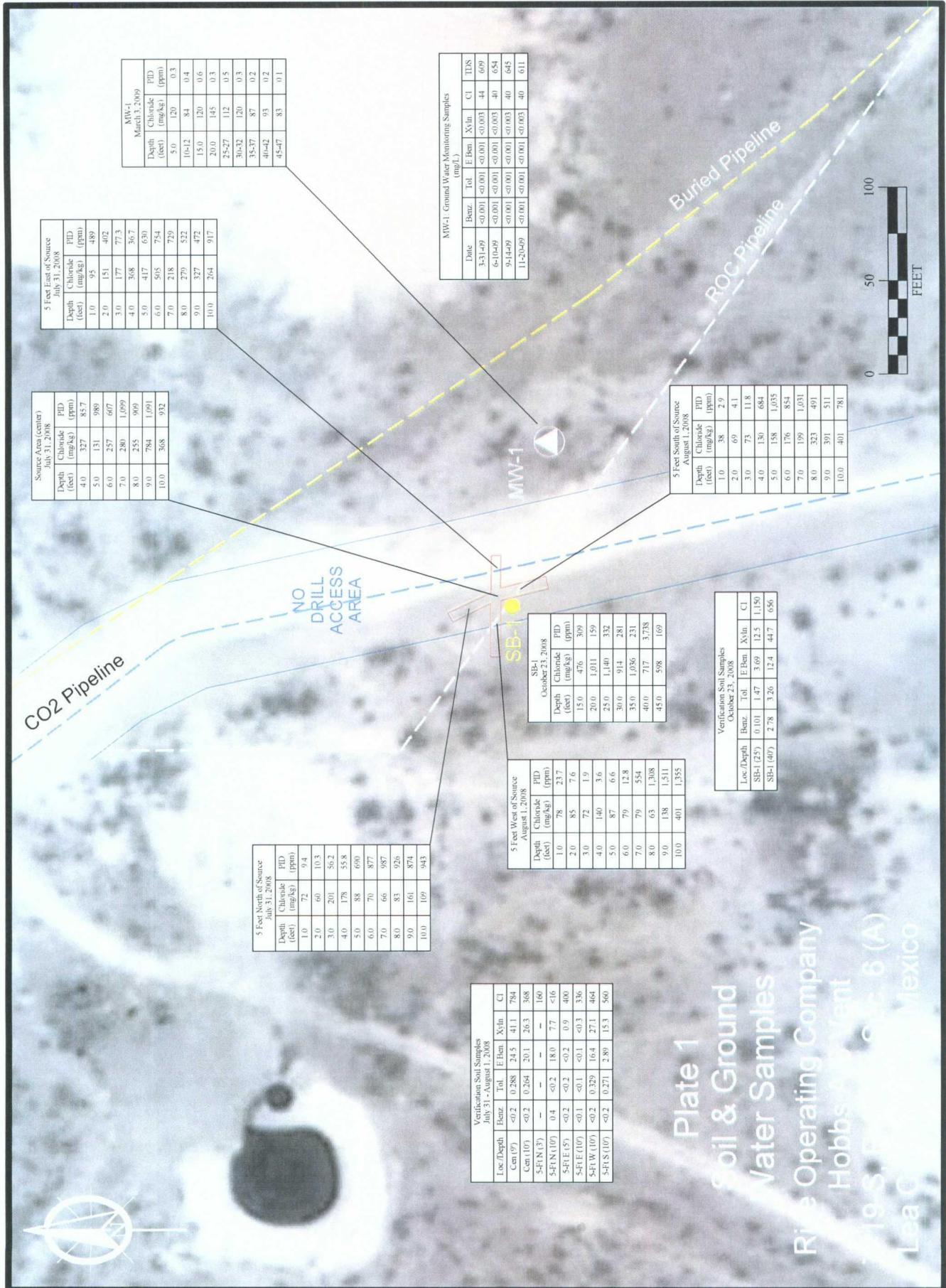


Dale T Littlejohn
Geologist

Copy: Hack Conder, ROC

Plates

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



Attachment A

April 4, 2008

Investigation & Characterization Plan

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

April 4, 2008

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

RE: Investigation & Characterization Plan
Hobbs Salt Water Disposal System: A-6 Vent, E-29 Vent, Jct. E-33-2, Jct L-
30, K-29 EOL, Jct. O-29-1 Vent, P-29 Vent
T18S, R38E, Sections 29, 30, 33 and T19S, R38E Section 6

Dear Mr. Hansen:

On behalf of Rice Operating Company (ROC), R.T. Hicks Consultants, Ltd. is pleased to submit this Investigation & Characterization Plan (ICP) for the seven junction box and vent sites within the Hobbs Salt Water Disposal System referenced above. Plate 1 is a map showing the sites relative to major roads in the area. Plate 2 shows the sites, nearby USGS monitoring wells and a regional potentiometric surface map.

The work elements proposed to characterize these sites sufficiently to develop and appropriate corrective action plan are presented below.

1. ROC will identify and document the location of all current and historic equipment and pipelines associated with each site.
2. ROC will use a backhoe with a 12-foot vertical reach to install a series of sampling trenches in order to recover soil samples and delineate the lateral extent (and potentially the vertical extent) of impacted soil.
3. If characterization by the backhoe is insufficient to define the extent and magnitude of past releases, ROC and Hicks Consultants will use a drilling rig to install one soil boring at the center of the source area to delineate the vertical extent of chloride in the soil.
4. Soil samples employed for delineation will be obtained from regular intervals below ground surface.
5. Representative soil samples will be sent to a laboratory to allow for verification of the field results.
6. General soil texture descriptions will be provided for each sample trench or boring.
7. The criteria to delineate the extent of impact during trenching as well as in a soil boring is 5 point chloride decline vs. depth, or:
 - a. After three consecutive samples demonstrate <250 ppm chloride using field analyses and <100ppm total hydrocarbon vapors using the

- headspace method (see attached ROC Quality Procedure in Appendix A), or
- b. After five consecutive samples show a decreasing trend of chloride and hydrocarbons and the last sample shows chloride < 250 ppm and total hydrocarbon vapors <100 ppm (Appendix A).
 - c. Soil boring to capillary fringe should neither (a) or (b) apply
 - 8. If the boring penetrates the capillary fringe, a monitoring well will be completed with a 2 or 4" diameter 25 feet down gradient from the source for use during possible corrective actions. Plate 2 presents a potentiometric surface map for the site area.
 - 9. If field analysis of hydrocarbon vapors and observations of staining show that hydrocarbon impact is unlikely at the site or below 20-feet, collection of samples from cuttings may be substituted for split spoon sampling (chloride only).

The ROC trench characterization will be employed to identify the lateral extent of chloride at each site, if possible. If trenching does not fully characterize the lateral extent of chloride at each site, boreholes will be advanced 20 feet beyond the furthest trenches where the soil data has an average chloride concentration greater than 1,000 mg/kg. The total depth of borings installed to characterize lateral extent shall be 20 feet below ground surface with soil samples for delineation taken at 5 foot intervals.

Rice Operating Company (ROC) is the service provider (agent) 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. The Hobbs SWD system is in abandonment.

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.
- 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:

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1. This Investigation and Characterization Plan (ICP), which is a proposal for data gathering, and site characterization and assessment (this submission).
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.

Following the site characterization described above, a Corrective Action Plan with the data and analysis supportive of a procedure for site closure will be submitted. Quality Procedures for characterization work are provided in Appendix A.

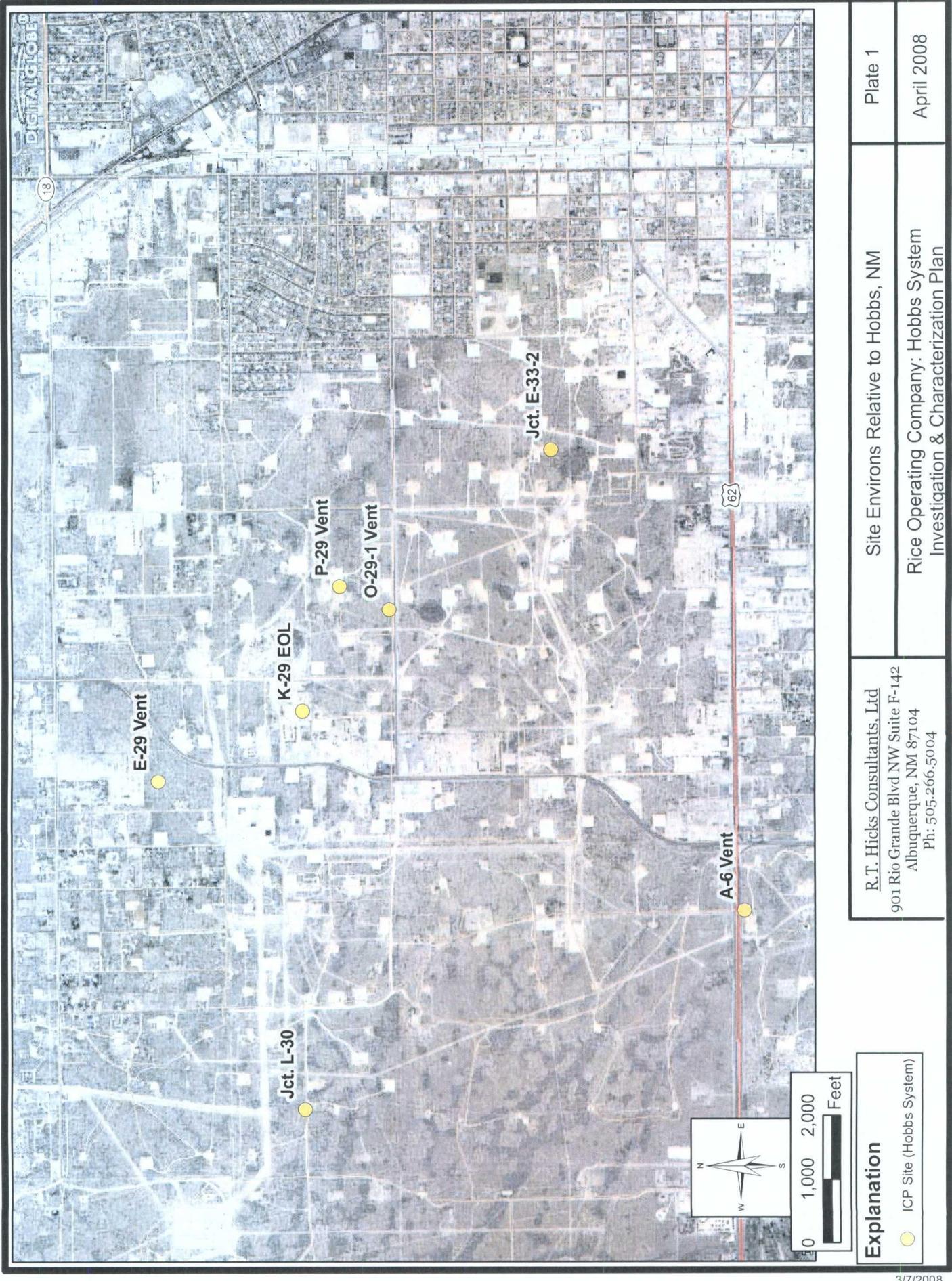
If you have any questions or comments regarding this ICP, please contact Kristin Pope of Rice Operating Company as she has reviewed and approved this submission.

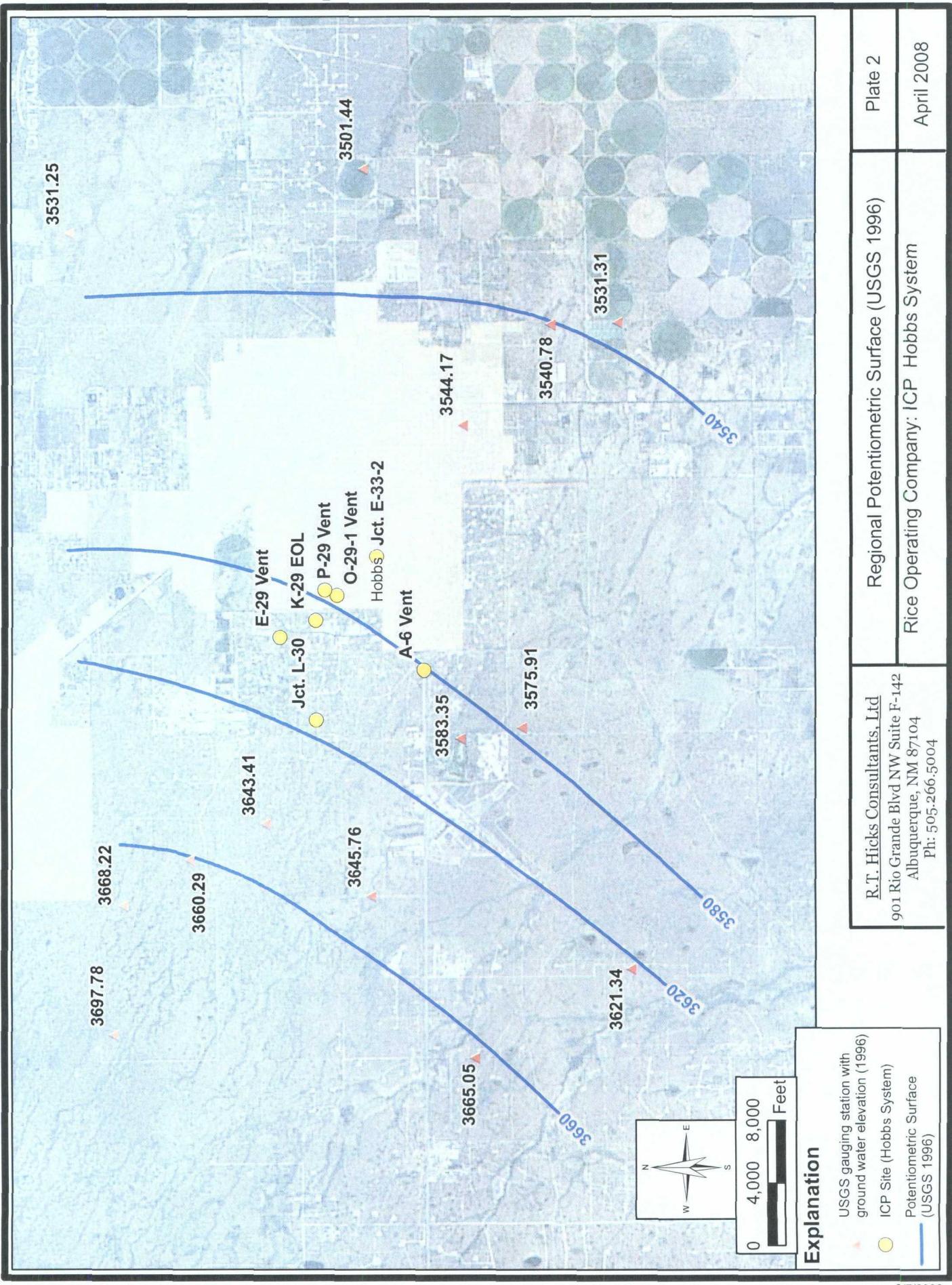
Sincerely,
R.T. Hicks Consultants, Ltd.



Randall T. Hicks
Principal

Copy: Rice Operating Company





Attachment B

Lithologic Logs

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

**RT Hicks
Consultants Ltd**

P O Box 7624
Midland, Texas 79708
(432) 528-3878
(432) 689-4578 (fax)

LITHOLOGIC LOG (Soil Boring)

SOIL BORING NO.: SB-1 TOTAL DEPTH: 49 Feet
SITE ID: Hobbs SWD A-6 CLIENT: Rice Operating Co.
SURFACE ELEVATION: 3,635 (USGS) COUNTY: Lea County
CONTRACTOR: Harrison Cooper STATE: New Mexico
DRILLING METHOD: Air-Rotary LOCATION: T-18-S R-38-E 6 (A)
INSTALLATION DATE: 10/22-23/08 FIELD REP: D. Littlejohn
WELL PLACEMENT: 5 ft SW of Marker FILE NAME: \Hobbs SWD\A-6
BORING LAT /LONG: Lat. 32° 41' 35.8" North, Long. 103° 10' 57.3"

No Surface Completion	Lithology	Sample Data				Depth (feet)	Lithologic Description: LITHOLOGY, Color, grain size, sorting, rounding, special features
		Type	% Rec	Cl (mg/kg)	PID (ppm)		
Bentonite Hole Plug	No Casing Installed	Excav.	--	78	24		SILT Dark brown.
		Excav.	--	85	7.6		SILT Brown, with some gray to greenish brown interbedded caliche, strong hydrocarbon odor.
		Excav.	--	72	1.9		
		Excav.	--	140	3.6		
		Excav.	--	87	6.6	5	
		Excav.	--	79	13		
		Excav.	--	79	554		
		Excav.	--	63	1,308		
		Excav.	--	138	1,511		
		Excav.	--	401	1,355	10	SILT & CALICHE (interbedded) Greenish brown, strong hydrocarbon odor.
No Casing Installed	No Casing Installed	Spoon	20%	476	309	15	
		Cutting	--	1,011	159	20	SILT Gray, with some thin-bedded (interbedded) grayish brown sandstone and brown fine crystalline quartzite.
		Cutting	--	1,140	332	25	SAND Black (discolored), medium grain, well sorted, sub-rounded, strong hydrocarbon odor.
		Cutting	--	914	281	30	
		Spoon	20%	1,036	231	35	SAND Dark brown (less discoloration), medium grain, well sorted, sub-rounded, strong hydrocarbon odor.
		Spoon	60%	717	3,738	40	
		Cutting	--	598	169	45	SANDSTONE grayish brown, fine grain, well sorted.
							SAND Dark brown, medium grain, well sorted, sub-rounded, moist.

TD = 49 Feet

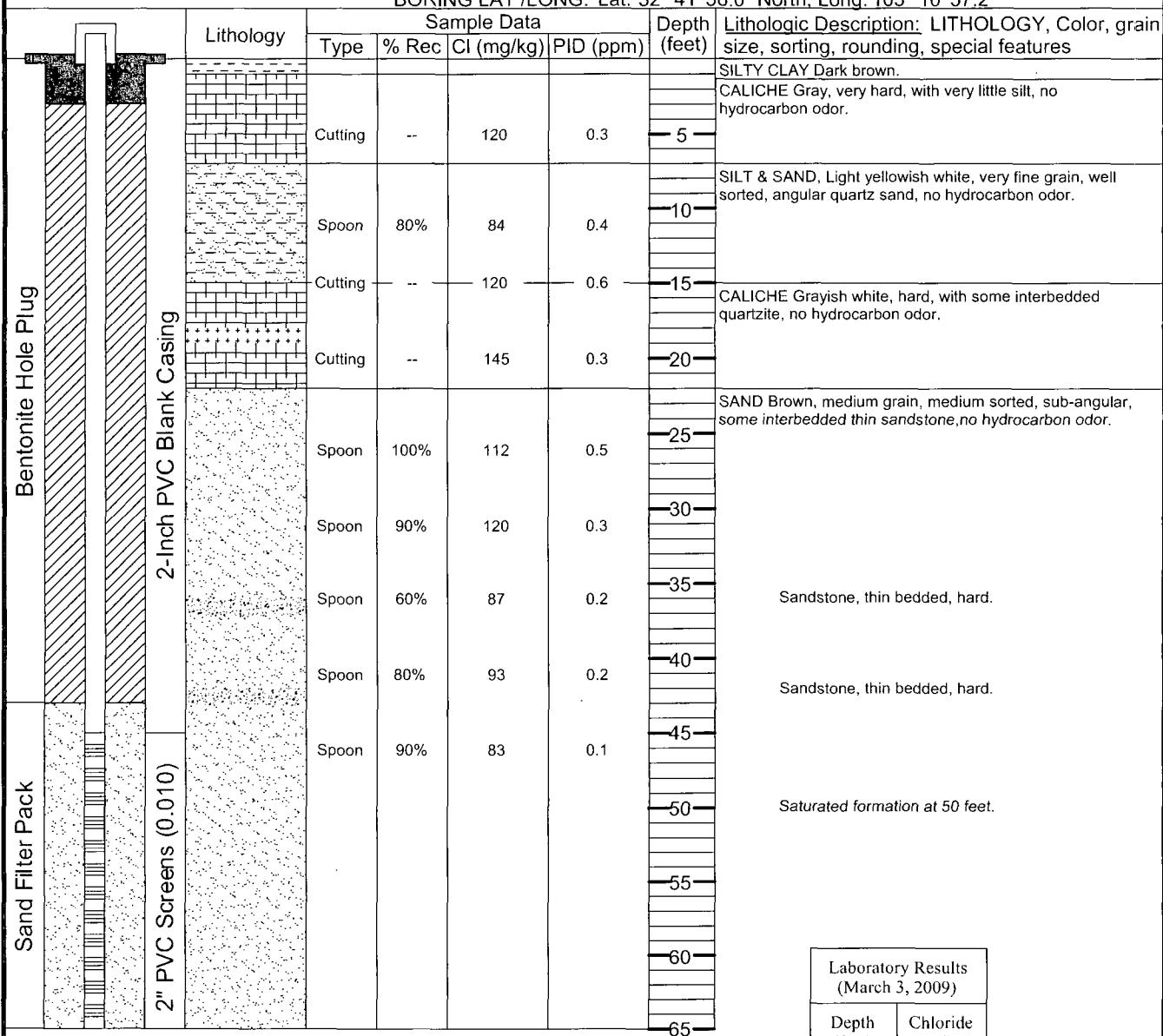
Laboratory Results (mg/kg) (July and September 2008)							
Depth	Chloride	Benzene	Toluene	Ethylbenzene	Xylenes	GRO	DRO
10 Ft	464	<0.2	0.329	16.4	27.1	1,430	4,310
25 Ft	1,150	0.101	1.47	3.69	12.5	614	4,790
40 Ft	656	2.78	3.26	12.4	44.7	2,180	5,510

**RT Hicks
Consultants Ltd**

P O Box 7624
Midland, Texas 79708
(432) 528-3878
(432) 689-4578 (fax)

LITHOLOGIC LOG (Monitoring Well)

SOIL BORING NO.: MW-1 TOTAL DEPTH: 65 Feet
SITE ID: Hobbs SWD A-6 CLIENT: Rice Operating Co.
SURFACE ELEVATION: 3,632 (USGS) COUNTY: Lea County
CONTRACTOR: Harrison Cooper STATE: New Mexico
DRILLING METHOD: Air-Rotary LOCATION: T-18-S R-38-E 6 (A)
INSTALLATION DATE: 3/3/09 FIELD REP: D. Littlejohn
WELL PLACEMENT: 85 ft ESE of Marker FILE NAME: \Hobbs SWD\A-6
BORING LAT /LONG: Lat. 32° 41' 36.0" North, Long. 103° 10' 57.2"



TD = 65 Feet

Laboratory Results (March 3, 2009)	
Depth (feet)	Chloride (mg/kg)
20	<16
45-47	<16

Appendix C

Lab Data

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



CARDINAL
LABORATORIES

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

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

Receiving Date: 03/22/10

Reporting Date: 03/26/10

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: T19S-R38E-SEC6 A~ LEA CO., NM

Sampling Date: 03/17/10

Sample Type: WATER

Sample Condition: COOL & INTACT

Sample Received By: JH

Analyzed By: ZL

LAB NUMBER SAMPLE ID

	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
--	-------------------	-------------------	-------------------------	-------------------------

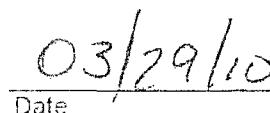
ANALYSIS DATE	03/24/10	03/24/10	03/24/10	03/24/10
H19508-1 MONITOR WELL #1	<0.001	<0.001	<0.001	<0.003
Quality Control	0.056	0.042	0.045	0.128
True Value QC	0.050	0.050	0.050	0.150
% Recovery	112	84.0	90.0	85.3
Relative Percent Difference	10.8	11.2	15.7	10.7

METHOD: EPA SW-846 8021B

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



Alan J. Keene
Chemist



Date



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

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

Receiving Date: 03/22/10

Reporting Date: 03/26/10

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: T19S R38E SEC6 A ~ LEA COUNTY, NM

Sampling Date: 03/17/10

Sample Type: WATER

Sample Condition: COOL & INTACT

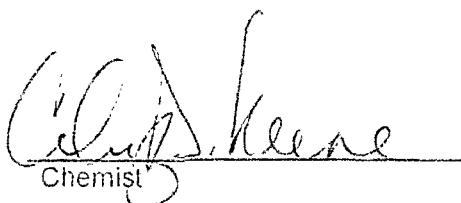
Sample Received By: JH

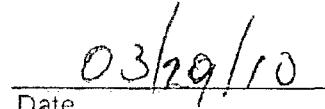
Analyzed By: CK/HM

LAB NO.	SAMPLE ID	Cl ⁻ (mg/L)	SO ₄ (mg/L)	TDS (mg/L)
Analysis Date:		03/25/10	03/25/10	03/23/10
H19508-1	MONITOR WELL #1	40	146	661
Quality Control		500	38.7	NR
True Value QC		500	40.0	NR
% Recovery		100	96.7	NR
Relative Percent Difference		<0.1	17.0	0.9

METHOD: Standard Methods, EPA 4500-CIB 375.4 160.1

Not accredited for Chloride, Sulfate and TDS.


Celia S. Kleene
Chemist


Date

H19508 RICE

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

Cardinal Laboratories, Inc.

101 East Main Street - Hobbs, New Mexico 88240
Tel (575) 393-2326 Fax (575) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ANALYSIS REQUEST (Circle or Specify Method No.)		LAB Order ID # _____	
Company Name: RICE Operating Company	PO#	BILL TO Company: RICE Operating Company Address: (Street, City, Zip) 122 W Taylor Street - Hobbs, New Mexico 88240	
Project Manager: Hack Conder	Fax#:	Phone#: (575) 393-9174	
Address: 122 W Taylor Street ~ Hobbs, New Mexico 88240	Fax#:	Phone #: (575) 397-1471	
Phone #: (575) 393-9174			
Project Name: Hobbs A-6 Vent			
Project Location: T19S R38E Sec 6A ~ Lea County - New Mexico			
LAB # FIELD CODE (LAB USE ONLY)		(G)rab or (C)omp # CONTAINERS FIELD WATER SOIL AIR SLUDGE HCL (2.0Ml VOA) NaHSO ₄ HNO ₃ H ₂ SO ₄ ICE (1-500ml HDPE)	
TIME		DATE (2010)	
MTEB 8021B/602		MTEB 8021B/602	
PAH 8270C		PAH 8270C	
TPH 4181/TX1005 / TX1005 Extended (C35)		TPH 4181/TX1005 / TX1005 Extended (C35)	
Total Metals Ag As Ba Cd Cr Pb Se Hg		Total Metals Ag As Ba Cd Cr Pb Se Hg 6010B/200.7	
TCLP Volatiles		TCLP Volatiles	
TCLP Semi Volatiles		TCLP Semi Volatiles	
RCI		RCI	
GC/MS Vol. 8260B/624		GC/MS Vol. 8260B/624	
GC/MS Semi. Vol. 8270C/625		GC/MS Semi. Vol. 8270C/625	
PCBs 8082/608		PCBs 8082/608	
BOD, TSS, PH		BOD, TSS, PH	
Moisture Content		Moisture Content	
Cations (Ca, Mg, Na, K)		Cations (Ca, Mg, Na, K)	
Anions (Cl, SO ₄ , CO ₃ , HCO ₃)		Anions (Cl, SO ₄ , CO ₃ , HCO ₃)	
Sulfates		Sulfates	
Total Dissolved Solids		Total Dissolved Solids	
Chlorides		Chlorides	
Turn Around Time ~ 24 Hours			
Relinquished by: <i>Rozanne Johnson</i> Date: 3-22-10 Time: 15:15 Received By: (Laboratory Staff) <i>Rozanne Johnson</i> Date: 3/22/10 Time: 15:15		Received by: <i>Rozanne Johnson</i> Date: 3/22/10 Time: 15:15 REMARKS: <i>ACM 100</i>	
Delivered By: (Circle One) <input checked="" type="checkbox"/> UPS - Bus - Other:		Sample Condition Cool <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Relinquished by: <input checked="" type="checkbox"/> Rozanne Johnson Date: 3-22-10 Time: 15:15		Checked By: <i>Rozanne Johnson</i> Date: 3/22/10 Time: 15:15 REMARKS: <i>ACM 100</i>	
Sampled - UPS - Bus - Other:		Phone Results Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Fax Results Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Additional Fax Number: <i>liveinheimer@riceswd.com</i>	
		Email Results to: <i>hconder@riceswd.com</i> <i>liveinheimer@riceswd.com</i> <i>kiones@riceswd.com</i> <i>rozanne@valonet.com</i>	



**ARDINAL
LABORATORIES**

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

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

Receiving Date: 11/23/09

Reporting Date: 11/24/09

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: T19S R38E SEC6 A~ LEA CO., N.M.

Sampling Date: 11/20/09

Sample Type: WATER

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: HM

LAB NO. SAMPLE ID

Cl^- (mg/L)	SO_4 (mg/L)	TDS (mg/L)
-------------------------	-------------------------	---------------

METHOD: Standard Methods, EPA

4500-C

375,4

160, 1

Not accredited for Chloride, Sulfate and TDS.

Alfred Keen
Chemist

12/01/09

Date

H18786 RICE

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

Receiving Date: 11/23/09

Reporting Date: 11/30/09

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: T19S-R38E-SEC6 A~ LEA CO., NM

Sampling Date: 11/20/09

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		11/25/09	11/25/09	11/25/09	11/25/09
H18786-1	MONITOR WELL #1	<0.001	<0.001	<0.001	<0.003
Quality Control		0.048	0.048	0.050	0.155
True Value QC		0.050	0.050	0.050	0.150
% Recovery		96.0	96.0	100	103
Relative Percent Difference		2.2	2.2	2.2	1.4

METHOD: EPA SW-846 8021B

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

Chemist

Date

Cardinal Laboratories, Inc.

4001 East Mainland - Hobbs, New Mexico 88240
Tel (575) 393-2326
Fax (575) 393-2276



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

Receiving Date: 09/15/09

Reporting Date: 09/17/09

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: T19S R38E SEC 6A ~ LEA CO., N.M.

Sampling Date: 09/14/09

Sample Type: WATER

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: HM

LAB NO. SAMPLE ID

Cl^- (mg/L)	SO_4 (mg/L)	TDS (mg/L)
-------------------------	-------------------------	---------------

METHOD: Standard Methods EPA

- 4500-CFB -

- 375 -

160.1

Not accredited for Chloride, Sulfate and TDS.

Chemist

Date _____

H16257 RICE

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

Receiving Date: 09/15/09

Reporting Date: 09/17/09

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: T19S-R38E-SEC6 A~ LEA CO., NM

Sampling Date: 09/14/09

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		09/16/09	09/16/09	09/16/09	09/16/09
H18257-1	MONITOR WELL #1	<0.001	<0.001	<0.001	<0.003
Quality Control		0.052	0.052	0.051	0.156
True Value QC		0.050	0.050	0.050	0.150
% Recovery		104	104	102	104
Relative Percent Difference		<1.0	<1.0	<1.0	2.0

METHOD: EPA SW-846 8021

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

Allyn S. Keene
Chemist

09/21/09
Date



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

Receiving Date: 06/10/09

Sampling Date: 06/10/09

Reporting Date: 06/15/09

Sample Type: WATER

Project Number: NOT GIVEN

Sample Condition: COOL & INTACT

Project Name: HOBBS A-6 VENT

Sample Received By: ML

Project Location: T19S-R38E-SEC6 A~ LEA CO., NM

Analyzed By: ZL

LAB NUMBER	SAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLEMES (mg/L)
ANALYSIS DATE		06/12/09	06/12/09	06/12/09	06/12/09
H17605-1	MONITOR WELL #1	<0.001	<0.001	<0.001	<0.003
Quality Control		0.047	0.047	0.046	0.141
True Value QC		0.050	0.050	0.050	0.150
% Recovery		94.0	94.0	92.0	94.0
Relative Percent Difference		1.4	2.5	1.4	<1.0

METHOD: EPA SW-846 8021 B

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE, AND TOTAL XYLEMES.

Glen S. Klein
Chemist

06/15/09
Date



PHONE (575) 393-2926 • 101 E. MARLAND • HOBBS, NM 88240

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

Receiving Date: 06/10/09

Reporting Date: 06/16/09

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: T19S R38E SEC5A ~ LEA CO., NM

Sampling Date: 06/10/09

Sample Type: WATER

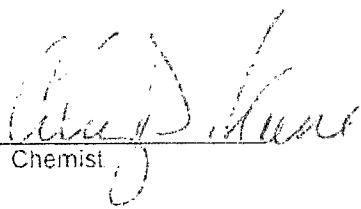
Sample Condition: COOL & INTACT

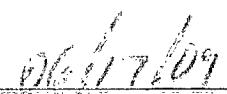
Sample Received By: ML

Analyzed By: HM

LAB NO.	SAMPLE ID	Cl ⁻ (mg/L)	SO ₄ (mg/L)	TDS (mg/L)
H17605-1	MONITOR WELL #1	40	123	654
Quality Control		500	38.8	NR
True Value QC		500	40.0	NR
% Recovery		100	97.1	NR
Relative Percent Difference		< 0.1	2.3	3.3

METHOD: Standard Methods, EPA
Not accredited for chloride, sulfate and TDS,


Chemist


Date

H17605 RICE

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

Receiving Date: 04/03/09

Reporting Date: 04/07/09

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: T19S-R38E-SEC6 A~ LEA CO., NM

Sampling Date: 03/31/09

Sample Type: WATER

Sample Condition: COOL & INTACT

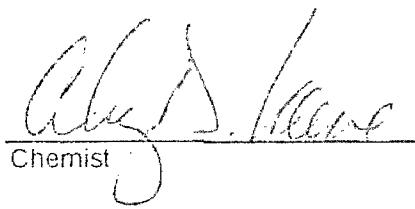
Sample Received By: ML

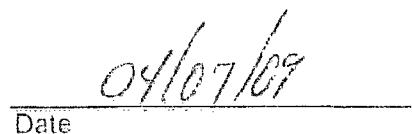
Analyzed By: ZL

LAB NUMBER SAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLEMES (mg/L)
ANALYSIS DATE	04/06/09	04/06/09	04/06/09	04/06/09
H17189-1 MONITOR WELL #1	<0.001	<0.001	<0.001	<0.003
Quality Control	0.048	0.048	0.047	0.144
True Value QC	0.050	0.050	0.050	0.150
% Recovery	96.0	96.0	94.0	96.0
Relative Percent Difference	2.3	1.4	1.5	<1.0

METHOD: EPA SW-846 8021 B

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE, AND TOTAL XYLEMES.


Chemist


Date



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

Receiving Date: 04/03/09

Reporting Date: 04/07/09

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: T19S-R38E-SEC6.A ~ LEA CO., NM

Sampling Date: 03/31/09

Sample Type: WATER

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: TR

LAB NO.	SAMPLE ID	Cl ⁻ (mg/L)	SO ₄ (mg/L)	TDS (mg/L)
Analysis Date:		04/03/09	04/03/09	04/03/09
H17189-1	MONITOR WELL #1	44	136	609
Quality Control		500	41.8	NR
True Value QC		500	40.0	NR
% Recovery		100	105	NR
Relative Percent Difference		< 0.1	< 0.1	< 0.1

METHOD: Standard Methods, EPA | 4500-CfB | 375.4 | 160.1

Andy Vane
Chemist

Andy Vane
Date

H17189 RICE

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HOBBS, NM 88240
FAX TO: (575) 397-1471

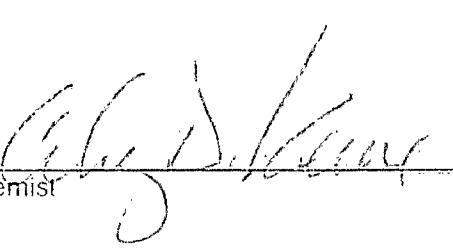
Receiving Date: 10/23/08
Reporting Date: 10/27/08
Project Number: NOT GIVEN
Project Name: HOBBS A-6 VENT
Project Location: HOBBS A-6 VENT

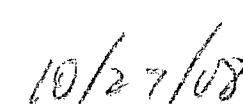
Sampling Date: 10/23/08
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: ML
Analyzed By: AB/HM

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/kg)	DRO (>C ₁₀ -C ₂₀) (mg/kg)	CI* (mg/kg)
ANALYSIS DATE		10/25/08	10/25/08	10/24/08
H16183-1	SB #1 @ 25'	614	4,790	1,150
H16183-2	SB #1 @ 40'	2,180	5,510	656
Quality Control		597	537	510
True Value OC		500	500	500
% Recovery		119	107	102
Relative Percent Difference		17.8	9.4	2.0

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI*: Std. Methods 4500-CIB

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


Chemist


Date

H16183 TCL RICE

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

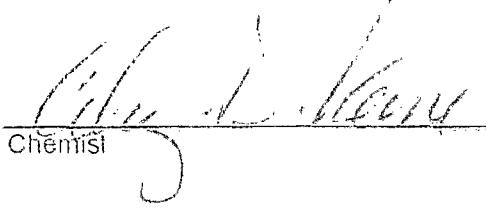
Receiving Date: 10/23/08
Reporting Date: 10/27/08
Project Number: NOT GIVEN
Project Name: HOBBS A-6 VENT
Project Location: HOBBS A-6 VENT

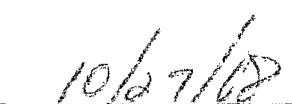
Sampling Date: 10/23/08
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: ML
Analyzed By: ZL

LAB NUMBER	SAMPLE ID	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL BENZENE (mg/kg)	TOTAL XYLEMES (mg/kg)
H16183-1	SB #1 @ 25'	0.101	1.47	3.69	12.5
H16183-2	SB #1 @ 40'	2.78	3.26	12.4	44.7
Quality Control		0.050	0.049	0.049	0.157
True Value QC		0.050	0.050	0.050	0.150
% Recovery		100	98.0	98.0	105
Relative Percent Difference		3.9	1.3	1.7	3.3

METHOD: EPA SW-846 8021B

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


Chemist


Date



ARDINAL LABORATORIES

1101 East Mainland, Hobbs, NM 88240 (505) 393-2326 FAX (505) 393-2476 2111 Beechwood, Abilene, TX 79603 (325) 673-7001 FAX (325) 673-7020

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ANALYSIS REQUEST									
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		Fax #: 397-1471			Project Owner:		City:		
Project #: H-261-A-6		Project Name: H-261-A-6			State: NM		State: Zip:		
Project Location: Hobbs, NM		Phone #: 505-424-7			Phone #: 505-424-7		Phone #:		
Sampler Name: Lara Weinheimer		Fax #: 505-424-7			Sampling Method:		Sampling Method:		
FOR LAB USE ONLY		Sample I.D.			Matrix		Sampling		
Lab I.D.		Sample I.D.			Preserv		Sampling		
H-261B3-1		36 & 1 = 25'			OTHER:		TIME		
-2		SB in 4 & 46'			ACID/BASE:		DATE		
					SLUDGE		TIME		
					OIL		DATE		
					WASTEWATER		TIME		
					GROUNDWATER		DATE		
					CONTAINERS		TIME		
					GRADE OR COMPO.		DATE		
					SOIL		TIME		
					GEOL		DATE		
					OTHER:		TIME		
					GEOL/COOL		DATE		
					ACID/BASE:		TIME		
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					GEOL/COOL		TIME		
					ACID/BASE:		DATE		
					OTHER:		TIME		
					GEOL/COOL		DATE		

WITNESS TO EVIDENCE AND CONFERENCES. Counsel, a family member, or any claim surviving spouse, named in paragraph 1 or 2(b), shall be invited to the present trial by the chief judge of the applicable court, including those for negligence and any other cause, shall be invited to attend whenever available. Counsel who has been retained by the plaintiff or defendant for a consecutive trial, including those for negligence and any other cause, shall be invited to attend whenever available. In the event that Counsel is not retained by the plaintiff or defendant for a consecutive trial, including those for negligence and any other cause, Counsel, regardless of whether he or she is retained by the plaintiff or defendant, shall be invited to attend whenever available.

Phone Result: _____
Fax Result: _____
Dewey Success: _____

Chen et al.

Hconder@riceswd.com; jpurvis@riceswd.com;

Lweinheimer@rICESWD.com

+ Conditional annual accident model schematic. Please see section above for EOE 2002-2475

NEED SAMPLES BACK. PLEASE



**CARDINAL
LABORATORIES**

PHONE (575) 393-2326 • 101 E. MARLAND • 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: 08/01/08

Reporting Date: 08/05/08

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: HOBBS A-6 VENT

Sampling Date: 07/31/08 & 08/01/08

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: AB/HM

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/kg)	DRO (>C ₁₀ -C ₂₈) (mg/kg)	Cl* (mg/kg)
H15651-1	SOURCE @ 9'	1,570	4,650	784
H15651-2	SOURCE @ 10'	1,150	5,970	368
H15651-3	5' N TRENCH @ 10'	1,150	5,270	< 16
H15651-4	5' N TRENCH @ 3'	98.6	5,490	160
H15651-5	5' E TRENCH @ 10'	503	1,660	336
H15651-6	5' E TRENCH @ 5'	679	4,660	400
H15651-7	5' W TRENCH @ 10'	1,430	4,310	464
H15651-8	5' S TRENCH @ 10'	918	4,740	560
Quality Control		507	489	500
True Value QC		500	500	500
% Recovery		101	97.8	100
Relative Percent Difference		1.2	12.2	< 0.1

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; Cl*: Std. Methods 4500-ClB

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

Chris Karr
Lab Director

08/05/08
Date

Copy of H15651TCL RICE

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



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

Receiving Date: 08/01/08

Reporting Date: 08/08/08

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: HOBBS A-6 VENT

Lab Number: H15651-1

Sample ID: SOURCE @ 9'

Analysis Date: 08/06/08

Sampling Date: 07/31/08

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: CK

VOLATILES (mg/kg)	Sample Result	Method	True Value		
	H15651-1	Blank	QC	%Recov.	QC

Benzene	<0.200	<0.002	0.056	112	0.050
Toluene	0.288	<0.002	0.060	120	0.050
Ethylbenzene	24.5	<0.002	0.053	106	0.050
m,p-Xylene	38.6	<0.004	0.118	118	0.100
o-Xylene	2.48	<0.002	0.062	124	0.050

% RECOVERY

Dibromofluoromethane	142
Toluene-d8	106
Bromofluorobenzene	134

METHODS: EPA SW-846 6260

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

Alayna Kleen
Chemist

08/09/08
Date



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

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

Receiving Date: 08/01/08

Reporting Date: 08/08/08

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: HOBBS A-6 VENT

Lab Number: H15651-1

Sample ID: SOURCE @ 9'

Analysis Date: 08/06/08

Sampling Date: 07/31/08

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: CK

VOLATILES (mg/kg)	Sample Result	Method	QC	True Value	% Recov.	QC
Naphthalene	23.2	<0.005	0.079	70.2	0.100	

% RECOVERY

Dibromofluoromethane	142
Toluene-d8	106
Bromofluorobenzene	134

METHODS: EPA SW-846 8260

Alfred Keene
Chemist

08/09/08
Date



**CARDINAL
LABORATORIES**

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

Receiving Date: 08/01/08

Reporting Date: 08/08/08

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: HOBBS A-6 VENT

Lab Number: H15651-2

Sample ID: SOURCE @ 10'

Analysis Date: 08/06/08

Sampling Date: 07/31/08

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: CK

VOLATILES (mg/kg)	Sample Result	Method	True Value		
	H15651-2	Blank	QC	%Recov,	QC
Benzene	<0.200	<0.002	0.056	112	0.050
Toluene	0.264	<0.002	0.060	120	0.050
Ethylbenzene	20.1	<0.002	0.053	106	0.050
m,p-Xylene	25.3	<0.004	0.118	118	0.100
o-Xylene	0.956	<0.002	0.062	124	0.050

% RECOVERY

Dibromofluoromethane	120
Toluene-d8	106
Bromofluorobenzene	115

METHODS: EPA SW-846 8260

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

John D. Keene
Chemist

08/09/08
Date



**CARDINAL
LABORATORIES**

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

Receiving Date: 08/01/08

Reporting Date: 08/08/08

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: HOBBS A-6 VENT

Lab Number: H15651-2

Sample ID: SOURCE @ 10'

Analysis Date: 08/06/08

Sampling Date: 07/31/08

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: CK

VOLATILES (mg/kg)	Sample Result H15651-2	Method Blank	True Value		
			QC	%Recov.	QC
Naphthalene	22.8	<0,005	0.079	79.2	0,100

% RECOVERY

Dibromofluoromethane	120
Toluene-d8	106
Bromofluorobenzene	115

METHODS: EPA SW-846 6260

Clay S. Vause
Chemist

08/09/08
Date



**CARDINAL
LABORATORIES**

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

Receiving Date: 08/01/08

Reporting Date: 08/08/08

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: HOBBS A-6 VENT

Lab Number: H15651-3

Sample ID: 5' N TRENCH @ 10'

Analysis Date: 08/06/08

Sampling Date: 07/31/08

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: CK

VOLATILES (mg/kg)	Sample Result H15651-3	Method Blank	True Value		
			QC	%Recov.	QC
Benzene	0.400	<0.002	0.056	112	0.050
Toluene	<0.200	<0.002	0.060	120	0.050
Ethylbenzene	18.0	<0.002	0.053	106	0.050
m,p-Xylene	7.57	<0.004	0.118	118	0.100
o-Xylene	<0.200	<0.002	0.062	124	0.050

% RECOVERY

Dibromofluoromethane	118
Toluene-d8	120
Bromofluorobenzene	123

METHODS: EPA SW-846 8260

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

C. A. Haen
Chemist

18/09/08
Date



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

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

Receiving Date: 08/01/08

Reporting Date: 08/08/08

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: HOBBS A-6 VENT

Lab Number: H15651-3

Sample ID: 5' N TRENCH @ 10'

Analysis Date: 08/06/08

Sampling Date: 07/31/08

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: CK

VOLATILES (mg/kg)	Sample Result	Method	QC	%Recov.	True Value	QC
Naphthalene	20.2	<0.005	0.070	79.2	0.100	

% RECOVERY

Dibromofluoromethane	116
Toluene-d8	120
Bromofluorobenzene	123

METHODS: EPA SW-846 8260

C.J. Keen
Chemist

08/09/08
Date



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

Receiving Date: 08/01/08

Reporting Date: 08/08/08

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: HOBBS A-6 VENT

Lab Number: H15651-5

Sample ID: 5' E TRENCH @ 10'

Analysis Date: 08/08/08

Sampling Date: 07/31/08

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: CK

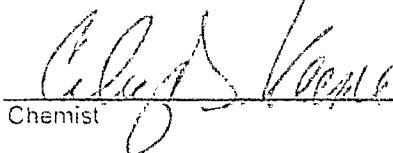
VOLATILES (mg/kg)	Sample Result	Method	QC	True Value	QC
Benzene	<0.100	<0.002	0.056	112	0.050
Toluene	<0.100	<0.002	0.060	120	0.050
Ethylbenzene	<0.100	<0.002	0.053	106	0.050
m,p-Xylene	<0.200	<0.004	0.118	118	0.100
o-Xylene	<0.100	<0.002	0.062	124	0.050

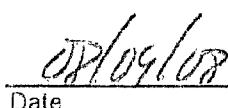
% RECOVERY

Dibromofluoromethane	98.7
Toluene-d8	105
Bromofluorobenzene	134

METHODS: EPA SW-846 8260

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


Chuck Conder
Chemist


Date
08/09/08



**CARDINAL
LABORATORIES**

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

Receiving Date: 08/01/08

Reporting Date: 08/08/08

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: HOBBS A-6 VENT

Lab Number: H15651-5

Sample ID: 5' E TRENCH @ 10'

Analysis Date: 08/08/08

Sampling Date: 07/31/08

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: CK

VOLATILES (mg/kg)	Sample Result	Method	QC	True Value	% Recov.	QC
Naphthalene	<0.250	<0.005	0.070	79.2	0.100	

% RECOVERY

Dibromofluoromethane	98.7
Toluene-d8	105
Bromofluorobenzene	134

METHODS: EPA SW-846 8260

A.J. Keane
Chemist

08/08/08
Date



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

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

Receiving Date: 08/01/08

Reporting Date: 08/08/08

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: HOBBS A-6 VENT

Lab Number: H15651-6

Sample ID: 5' E TRENCH @ 5'

Analysis Date: 08/06/08

Sampling Date: 07/31/08

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: CK

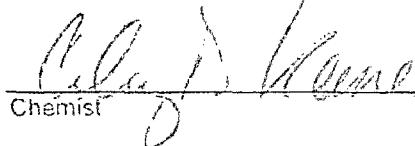
VOLATILES (mg/kg)	Sample Result	Method	QC	True Value	%Recov.	QC
Benzene	<0.200	<0.002	0.056	112	0.050	
Toluene	<0.200	<0.002	0.060	120	0.050	
Ethylbenzene	<0.200	<0.002	0.053	106	0.050	
m,p-Xylene	0.686	<0.004	0.118	118	0.100	
o-Xylene	<0.200	<0.002	0.062	124	0.050	

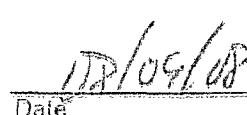
% RECOVERY

Dibromofluoromethane	107
Toluene-d8	107
Bromofluorobenzene	107

METHODS: EPA SW-846 8260

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


Chemist


Date



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

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

Receiving Date: 08/01/08

Reporting Date: 08/08/08

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: HOBBS A-6 VENT

Lab Number: H15651-6

Sample ID: 5' E TRENCH @ 5'

Analysis Date: 08/06/08

Sampling Date: 07/31/08

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: CK

VOLATILES (mg/kg)	Sample Result	Method	QC	True Value	%Recov.	QC
Naphthalene	<0.500	<0.005	0.079	79.2	0.100	

% RECOVERY

Dibromofluoromethane	107
Toluene-d8	107
Bromofluorobenzene	107

METHODS: EPA SW-846 8260

Chris Kone
Chemist

18/09/08
Date



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

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

Receiving Date: 08/01/08

Reporting Date: 08/08/08

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: HOBBS A-6 VENT

Lab Number: H15651-7

Sample ID: 5' W TRENCH @ 10'

Analysis Date: 08/06/08

Sampling Date: 08/01/08

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: CK

VOLATILES (mg/kg)	Sample Result H15651-7	Method Blank	True Value		
			QC	%Recov.	QC
Benzene	<0.200	<0.002	0.056	112	0.050
Toluene	0.329	<0.002	0.060	120	0.050
Ethylbenzene	16.4	<0.002	0.053	106	0.050
m,p-Xylene	26.2	<0.004	0.118	118	0.100
o-Xylene	0.870	<0.002	0.062	124	0.050

% RECOVERY

Dibromofluoromethane	113
Toluene-d8	111
Bromofluorobenzene	108

METHODS: EPA SW-846 8260

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

Chémist

Date

08/09/08



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

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

Receiving Date: 08/01/08
Reporting Date: 08/08/08
Project Number: NOT GIVEN
Project Name: HOBBS A-6 VENT
Project Location: HOBBS A-6 VENT
Lab Number: H15651-7
Sample ID: 5' W TRENCH @ 10'

Analysis Date: 08/06/08
Sampling Date: 08/01/08
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: ML
Analyzed By: CK

VOLATILES (mg/kg)	Sample Result H15651-7	Method Blank	True Value		
			QC	%Recov.	QC
Naphthalene	13.4	<0.005	0.079	79.2	0.100

% RECOVERY

Dibromofluoromethane	113
Toluene-d8	111
Bromofluorobenzene	108

METHODS: EPA SW-846 8260

Alayna Kaine
Chemist

6/8/09/08
Date



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

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

Receiving Date: 08/01/08

Reporting Date: 08/08/08

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: HOBBS A-6 VENT

Lab Number: H15651-8

Sample ID: 5' S TRENCH @ 10'

Analysis Date: 08/06/08

Sampling Date: 08/01/08

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: CK

Sample Result
VOLATILES (mg/kg)

H15651-8

Method
Blank

True Value
QC %Recov. QC

	Sample Result	Method	QC	%Recov.	True Value
Benzene	<0.200	<0.002	0.056	112	0.050
Toluene	0.271	<0.002	0.060	120	0.050
Ethylbenzene	2.89	<0.002	0.053	106	0.050
m,p-Xylene	12.6	<0.004	0.118	118	0.100
o-Xylene	2.65	<0.002	0.062	124	0.050

% RECOVERY

Dibromofluoromethane	109
Toluene-d8	110
Bromofluorobenzene	108

METHODS: EPA SW-846 8260

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

John D. Skene
Chemist

08/09/08
Date



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

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

Receiving Date: 08/01/08

Reporting Date: 08/08/08

Project Number: NOT GIVEN

Project Name: HOBBS A-6 VENT

Project Location: HOBBS A-6 VENT

Lab Number: H15651-8

Sample ID: 5' S TRENCH @ 10'

Analysis Date: 08/06/08

Sampling Date: 08/01/08

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: CK

VOLATILES (mg/kg)	Sample Result H15651-8	Method Blank	QC	%Recov.	True Value QC
Naphthalene	14.0	<0.005	0.079	79.2	0.100

% RECOVERY

Dibromofluoromethane	109
Toluene-d8	110
Bromofluorobenzene	108

METHODS: EPA SW-846 8260

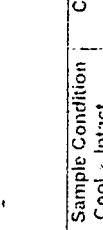
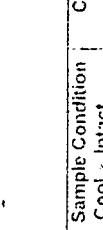
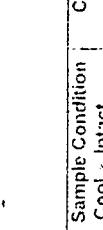
Mark Slane
Chemist

08/09/08
Date

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ARDINAL LABORATORIES

1101 East Marland, Hobbs, NM 88240 (505) 393-2326 FAX (505) 393-2476 2111 Beechwood, Abilene, TX 79603 (325) 673-7001 FAX (325) 673-7020

ANALYSIS REQUEST																																																																																													
BILL TO																																																																																													
Company Name:	Rice Operating Company	P.O. #:																																																																																											
Project Manager:	Hack Conder	Attn:																																																																																											
Address:	122 West Taylor	State:	NM	Zip:	88240																																																																																								
City: Hobbs		Fax #:	397-1471	Address:																																																																																									
Phone #:	393-9174	Project Owner:		City:																																																																																									
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Project Location:	Hobbs A-6 vent			Fax #:																																																																																									
Sampler Name:	Lara Weinheimer																																																																																												
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<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Lab I.D.</th> <th rowspan="2">Sample I.D.</th> <th colspan="2">FOR USE ONLY</th> <th colspan="2">SAMPLING</th> <th colspan="2"></th> </tr> <tr> <th>MATRIX</th> <th>PRESERV.</th> <th>DATE</th> <th>TIME</th> <th></th> <th></th> </tr> </thead> <tbody> <tr><td>11/25/1</td><td>source E 9'</td><td>✓</td><td>✓</td><td>1-31-08</td><td>11:18</td><td>✓</td><td>✓</td></tr> <tr><td>-2</td><td>source E 10'</td><td>✓</td><td>✓</td><td>1-31-08</td><td>11:14</td><td>✓</td><td>✓</td></tr> <tr><td>-3</td><td>S.E trench E 10'</td><td>✓</td><td>✓</td><td>1-31-08</td><td>12:53</td><td>✓</td><td>✓</td></tr> <tr><td>-4</td><td>S.E trench E 10'</td><td>✓</td><td>✓</td><td>1-31-08</td><td>1:10</td><td>✓</td><td>✓</td></tr> <tr><td>-5</td><td>S.E trench E 10'</td><td>✓</td><td>✓</td><td>1-31-08</td><td>2:03</td><td>✓</td><td>✓</td></tr> <tr><td>-6</td><td>S.E trench E 5'</td><td>✓</td><td>✓</td><td>1-31-08</td><td>2:11</td><td>✓</td><td>✓</td></tr> <tr><td>-7</td><td>S.E trench E 10'</td><td>✓</td><td>✓</td><td>8-1-08</td><td>9:22</td><td>✓</td><td>✓</td></tr> <tr><td>-8</td><td>S.E trench E 10'</td><td>✓</td><td>✓</td><td>8-1-08</td><td>9:20</td><td>✓</td><td>✓</td></tr> <tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> </tbody> </table>								Lab I.D.	Sample I.D.	FOR USE ONLY		SAMPLING				MATRIX	PRESERV.	DATE	TIME			11/25/1	source E 9'	✓	✓	1-31-08	11:18	✓	✓	-2	source E 10'	✓	✓	1-31-08	11:14	✓	✓	-3	S.E trench E 10'	✓	✓	1-31-08	12:53	✓	✓	-4	S.E trench E 10'	✓	✓	1-31-08	1:10	✓	✓	-5	S.E trench E 10'	✓	✓	1-31-08	2:03	✓	✓	-6	S.E trench E 5'	✓	✓	1-31-08	2:11	✓	✓	-7	S.E trench E 10'	✓	✓	8-1-08	9:22	✓	✓	-8	S.E trench E 10'	✓	✓	8-1-08	9:20	✓	✓								
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<p>PLEASE NOTE: Liability and Damages - Contender's liability and client's exclusive remedy for any claim resulting from or arising out of the analysis of test, 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 dismissed, waived, and/or held in abeyance within 30 days after completion of the analysis. In event that Contender becomes insolvent, bankrupt, or otherwise unable to meet its obligations, liability for any claim resulting from or arising out of the analysis shall be limited to the amount paid by the client. No claim for damages, including without limitation business interruption, loss of use, or loss of profits incurred by client, its heirs, executors, administrators, successors, assigns, or other persons or entities, shall be allowed.</p>																																																																																													
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<p>Hconder@riceswd.com, jpurvis@riceswd.com, Lweinheimer@rice.swd.com</p>																																																																																													

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Hconder@riceswd.com; jpurvis@riceswd.com;
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† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

Appendix D

Model Explanations

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

Input and Results of the AMIGO Simulation Performed at the Rice Operating Co. Hobbs A-6 Vent Site

The specific parameters used in the simulation at the site are presented in the table below.

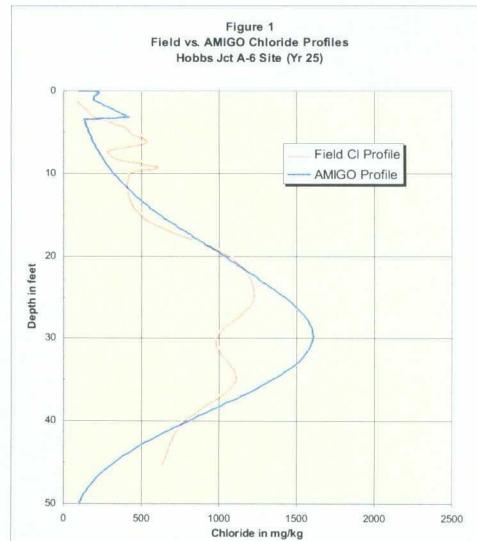
Table 1 - Parameters Employed in AMIGO tool for the Hobbs A-6 Vent Site

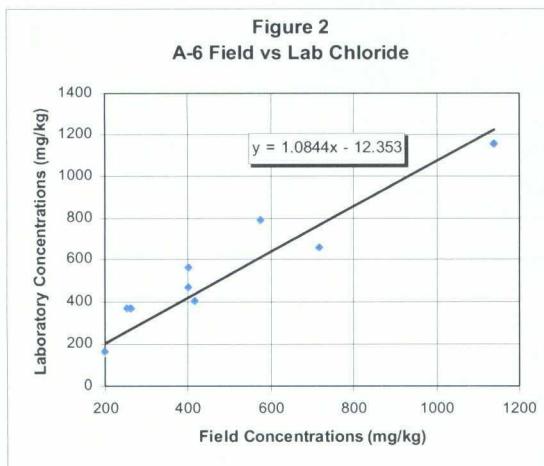
Model Parameter	Value	Source of Value
Climate (non-smoothed)	1946 - 1992	Pearl, NM Station
Input for distant or hypothetical well (ft)	NA	Not Required
Background Chloride in Aquifer (mg/L)	50	Results MW-1
Aquifer Porosity (unitless)	0.25	Prof. Judgment Conservative Assumption
Groundwater Table Depth (ft)	50	Measurement MW-1
Aquifer Thickness (ft)	30	Professional Judgment Conservative Assumption
Slope of Water Table	0.0035	Regional Map (Attachment A)
Hydraulic Conductivity (ft/d)	80	Musharrafieh 1999
Average Chloride Load (kg/m ²)	19.0	Worst-Case Profile Match to Measured Site Data
Max length of spill in dir. of GW flow (ft)	50	Site Data
Plant Uptake Trigger (%)	1.0	Prof. Judgment Conservative Assumption
Surface Layer	Caliche	Site Data
Soil Profile	Med. Sand	Site Data

Musharrafieh and Chudnoff (1999) predict that the saturated thickness of the aquifer beneath the site will remain at least 50 feet until the year 2040. Data from similar sites show that, unlike hydrocarbons, chloride that enters the upper portion of an aquifer will become distributed throughout the entire saturated thickness within a relatively short travel distance from the source. The arbitrary selection of a 10-foot thick mixing zone (used as a default value for hydrocarbon sites) is unrealistic where the constituent of concern is chloride. In our opinion, a simulation using the 30-foot thickness of the aquifer is conservative for this site.

The AMIGO tool assumes a single surface spill is the initial source of chloride that is observed in the subsurface. In order to ensure an accurate calibration of the model to the historic spill which occurred at the Hobbs A-6 Vent site, we compared each year of the simulated profile with the field data until a conservative match was achieved. A favorable but conservative match to the field data was achieved using the year 25 simulation and the calculated chloride mass-load for the worst-case area of the release as demonstrated in Figure 1.

The red curve on Figure 1 is the profile using the maximum field chloride analysis for each depth sampled from the excavations (2 to 10 feet) and SB-1 (below 10 feet). The field (titration) concentrations were then adjusted based on a correction determined

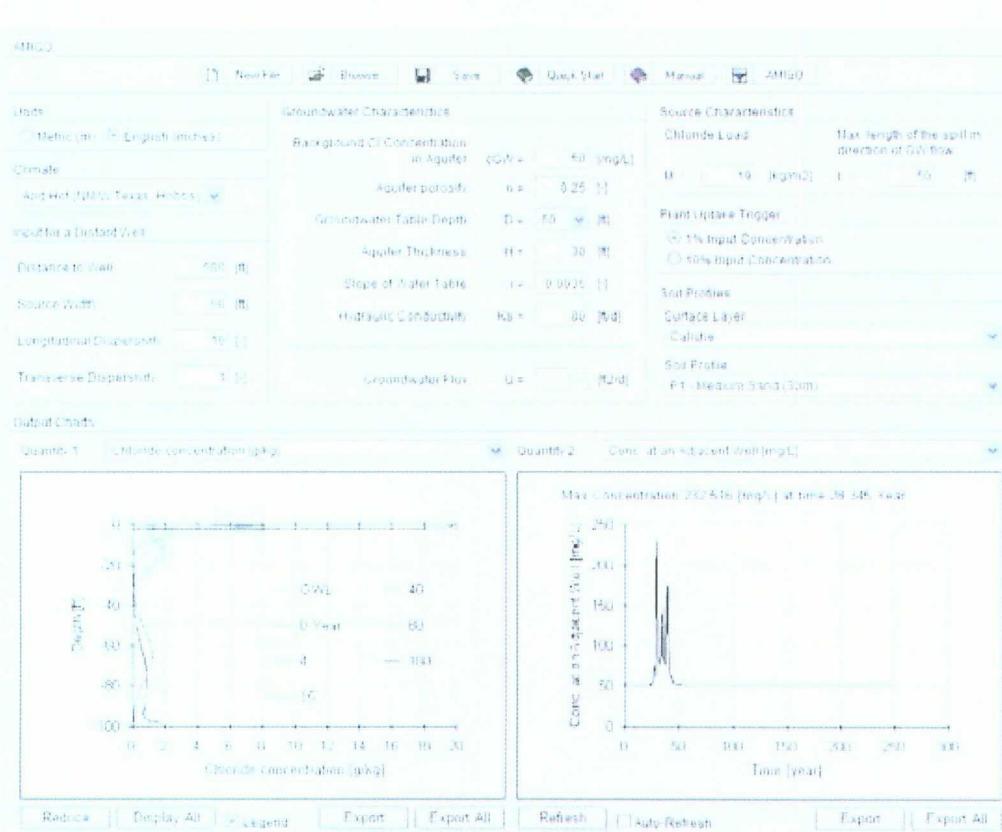




model results screen. It indicates that chloride concentrations in the ground water below the site, using the “worst-case” chloride load, will reach a maximum concentration of 232.5 mg/L (below standards) in 28 years from the data recovery date if no further corrective actions are taken. We believe the simulated concentration in ground water is a “worst-case” prediction because of the conservative input parameters used in the model.

The results of the simulation are shown below on the AMIGO ground water output chart which has been copied directly from the

AMIGO ground water output chart which has been copied directly from the



by comparing the field chloride concentrations with the duplicate laboratory sample concentrations as shown in Figure 2.

The blue curve in Figure 1 is the predicted chloride profile at year 25 of the simulation using a chloride load of 19.0 kg/m² (calculated from site data). Because the AMIGO simulation used the highest chloride area to represent the entire site it is considered a conservative input parameter.

R. T. HICKS CONSULTANTS, LTD.

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Input and Results of the VLEACH Simulation Performed at the Rice Operating Co. Hobbs A-6 Vent Site

The specific parameters used in the simulation and diffusion to ground water equation at the site are presented in the table and figures below.

Table 1 – Common Parameters Employed in the VLEACH model for the Hobbs A-6 Vent Site

Model Parameter	Value	Source of Value
Benzene & Xylene Chemical Parameters	Chemical Specific	NMED June 2006 Soil Screening Levels Document
Spill Area (ft ²)	3,000	Site Measurement
Groundwater Table Depth (ft)	50	Site Measurement (MW-1)
Vadose Zone Soil Bulk Density (g/cm ³)	1.5	NMED June 2006 Document
Vadose Zone Porosity (unitless)	0.43	NMED June 2006 Document
Volumetric Water Content (%)	0.26	NMED June 2006 Document
Vadose Zone Soil Organic Content (f _{oc})	0.0015	NMED June 2006 Document
Recharge Rate (ft/year)	0.131	Musharrafieh 1999
Benzene & Xylene Concentrations (ug/kg)	Chemical Specific	Worst-Case Hydrocarbon Profile (Excavations & SB-1)
Slope of Water Table	0.0035	Regional Map (Attachment A)
Hydraulic Conductivity (ft/d)	80	Musharrafieh 1999
Max width perpendicular to direction of GW flow (ft)	50	Site Measurement
Aquifer Porosity (unitless)	0.25	Prof. Judgment Conservative Assumption
Mixing zone depth in aquifer	6.6	Prof. Judgment Conservative Assumption

Figure 1 - Actual Input Screens from the VLEACH Model Program for the Benzene Run

VLEACH Model Parameters

Simulation Parameters			
Title: Hobbs A-6 Vent - Benzene contamination scenario			
Simulation Time	Time Step	Output Time Interval	Print Time Interval
500	10	20	200
YEARS	YEARS	YEARS	YEARS

Chemical Parameters			
Chemical - Reference Chemical Profiles			
Chemical Name: Benzene - NM			
Organic Carbon Distribution Coefficient	Henry's Law Constant	Water Solubility	Water Air Diffusion Coefficient
8.2	0.200	0.750	0.0307
mg/L	mg/m ³	mg/L	m ³ /day

Polygon			
Polygon Selected:	Number of Polygons(1):		
Polygon1		<input type="button" value="Add New Polygon"/> <input type="button" value="View Polygon"/> <input type="button" value="Delete Polygon"/>	

Polygon Parameters			
Polygon Title: [polygon]			
Area of Polygon:	Vertical Cell Dimension:	Number of Cells:	Height of Polygon:
3000	1	50	50
Square 3			
Slope of Water Table			

Soil Parameters			
Soil Type: [Reference or Soil Type Profile]			
Soil Type Name: Sand - NM			
Dry Bulk Density	Effective Porosity	Volumetric Water Content	Soil Organic Carbon Content
1.5	0.43	0.26	0.0015
g/cm ³	[%]	[%]	[%]

Boundary Conditions			
Recharge Rate	Concentration of Recharge Water	Upper Boundary Vapor Condition	Lower Boundary Vapor Condition
0.016	0	0	0
ft/year	mg/L	mg/L	mg/L

Output Options		Initial Contaminant Concentration	
Create Groundwater and Soil Contaminant Profile		Upper Cell	Lower Cell
<input checked="" type="radio"/>	Yes	1	10
<input type="radio"/>	No	2	10
Soil Contaminant Profile Time (Years)		3	10
		4	30
		5	300
		10	300
		6	300
		7	300

Simulation Time, Time Step, Output Time Interval, and Profile Time Interval were selected to provide the clearest presentation of the results based on the time required to identify the maximum impact to groundwater.

As a conservative measure, a “worst-case” hydrocarbon soil profile was constructed by taking the highest benzene concentration from each sampled depth as shown in Figure 2. Sampling depths for which laboratory results were available were estimated from the field screening data. The benzene values from this profile were conservatively assumed to be present across the entire 3,000 ft² area.

The results from the VLEACH modeling relative to this assessment are provided as a graph that presents the subsurface impact as Mass Flux to Ground Water in grams/year (g/yr) as a function of future time as shown below:

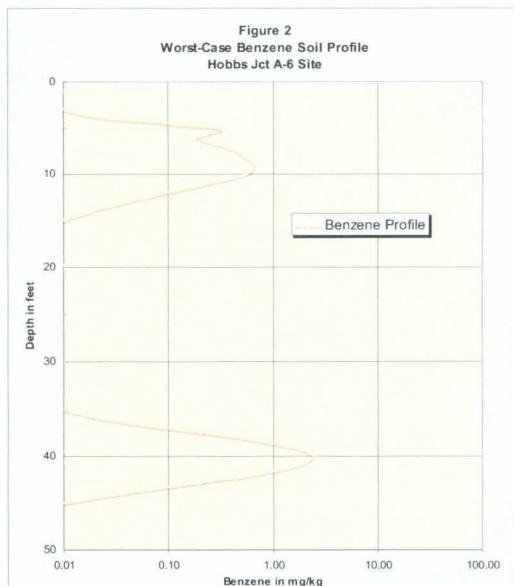
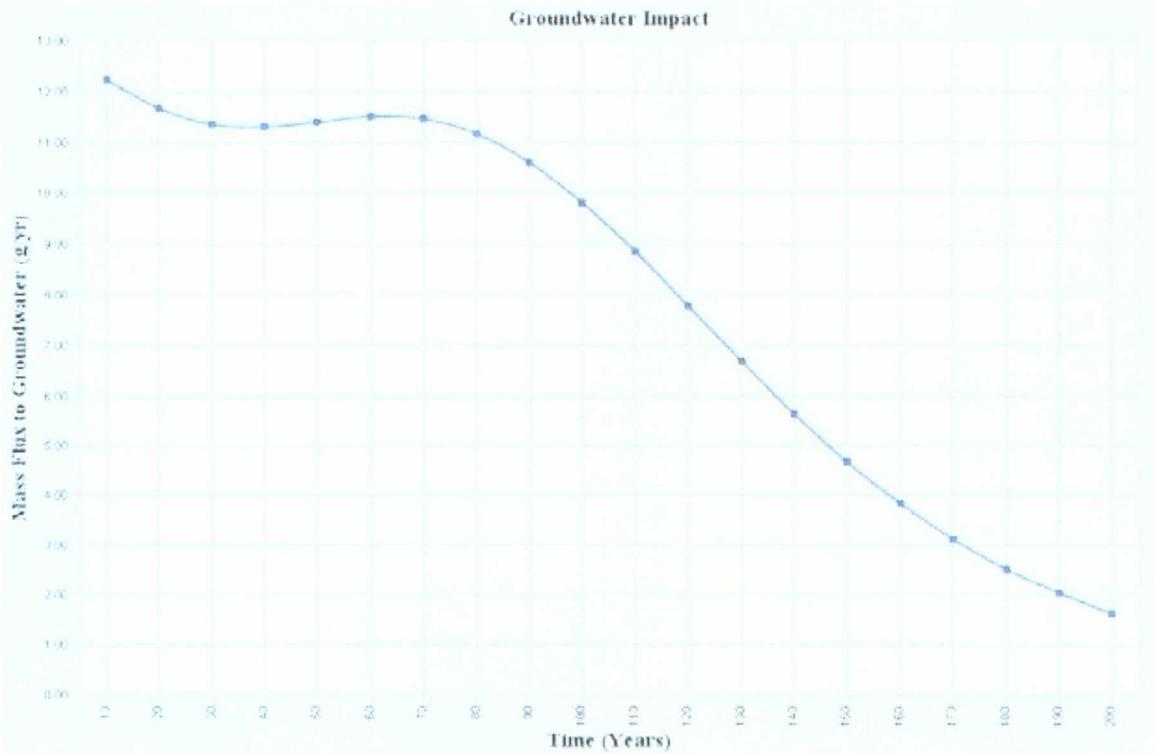


Figure 3
Results of VLEACH Vadose Model for Benzene



In order to compare the modeled results to the NMED ground water standard, the VLEACH output data required a conversion from g/yr to mg/L. This was performed by calculating the annual recharge (flux) volume from the spill area and the annual ground water flow volume below the spill area as shown:

Recharge is defined as: $Flux_{flow}(L/yr) = A \times R \times 29.317$ where,

A = spill area (ft^2)

R = recharge rate (ft/yr), and

29.317 = conversion factor from ft^3 to liters

Groundwater flow is defined as: $GW_{flow}(L/yr) = \left(\frac{k \times i}{\theta_T} \right) \times T_{aq} \times W \times 29.317$ where,

k = hydraulic conductivity of the aquifer (ft/yr)

i = groundwater gradient (ft/ft)

θ_T = porosity of the aquifer

T_{aq} = aquifer mixing zone thickness (ft) and,

W = length of the spill area (ft) perpendicular to the ground water gradient direction

The relationship between the annual recharge volume and the annual ground water flow volume was used to calculate the predicted ground water concentration for the initial (year zero) time and the maximum impact year time for the constituent of concern as demonstrated on the table below:

Chemical of Concern	Present Impact Data				Maximum Impact Data				NM Water Quality (mg/L)
	Year	Impact (g/yr)	Leachate Conc. (mg/L)	GW Conc. (mg/L)	Year	Impact (g/yr)	Leachate Conc. (mg/L)	GW Conc. (mg/L)	
Benzene	0	13	5.4	0.003	0	13	5.4	0.003	0.01