1R - 222-O

APPROVALS

YEAR(S):

CLOSED

Price, Wayne

From: Price, Wayne
Sent: Friday, November 16, 2001 3:26 PM
To: 'riceswd@leaco.net'; 'whearth@iamerica.net'
Cc: Sheeley, Paul; Johnson, Larry
Subject: SWD P-25 Facility

Contacts: Carolyn Doran Haynes

Dear Ms. Haynes:

The OCD is in receipt of the Pit Remediation and Closure Report dated January 27, 2000 for the subject facility and hereby approves of the closure report.

Please be advised that NMOCD approval of this closure plan does not relieve Rice Operating Company of responsibility should their closure activities have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Rice Operating Company of responsibility for compliance with any other federal, state, or local laws and/or regulations.

RICE *Operating Company*
122 West Taylor • Hobbs, New Mexico 88240
Phone: (505)393-9174 • Fax: (505) 397-1471

CERTIFIED MAIL
RETURN RECEIPT NO. Z 577 009 528

January 27, 2000

Mr. Wayne Price
State of NM Energy and Minerals Dept.
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, NM 87505

Re: PIT REMEDIATION AND CLOSURE REPORT
Emergency Overflow Pit (Permit No. H-61)
Below-Ground Redwood Tank Excavation
SWD P-25 Facility
SE/4, Unit Letter P, Sec. 25, T18S, R37E
Lea County, NM

Dear Mr. Price:

Rice Operating Company (ROC) sincerely appreciates NMOCD consideration and response concerning the closure of the emergency overflow pit and the below-ground redwood tanks that were located at the P-25 Salt Water Disposal Facility.

ROC contracted with Whole Earth Environmental of Houston, TX, to manage the environmental closure activities at the P-25 SWD Facility. A full description of the activities and laboratory results is included in this closure package. Ms. Donna Williams, of the OCD Hobbs District Office visited the site during excavation activity. Mr. Gary Wink, also of the OCD Hobbs District Office visited the site to witness the final sample procurement.

The final excavation of the tank sites and the pit resulted in TPH and BTEX levels at bottoms and on sides that are below the recommended guidelines for vadose zone impact when groundwater is less than 50' below surface.

ROC has chosen to abandon the use of this site as a disposal facility rather than replace the tanks. The SWD Well P-25 is still a viable, active well and will be held in reserve for sale or possible future use. If or when deemed necessary, ROC is prepared to conduct appropriate measures to

plug and abandon the well bore. The 3-acre lease with the NM State land Office is valid for this site until September 2000.

The source of contamination is removed, the impacted soil has been excavated and removed to a permitted, commercial facility, and natural attenuation will be relied upon to remediate any hydrocarbons remaining in the vadose zone over the foreseeable future.

At this time, ROC applies for closure at this facility and submits the Pit Remediation and Closure Final Report for the P-25 SWD Facility. As always, Rice Operating Company will appreciate timely consideration in this matter.

If you have any questions, please call.

Carolyn Doran Haynes

Carolyn Doran Haynes
Operations Engineer

Enclosures: Pit Remediation and Closure Report P-25 Facility
State land Office Lease Copy
Pit Inventory Permit H-61
Pit Inventory Forms
Generic Closure Work Plan for Existing Pits and Below-Grade Redwood Tanks
Photos of Site and Excavations
Maps and Analytical Data
Disposal Manifests

Cc: KH, LBG, file, Donna Williams
OCD Hobbs District
1625 N. French Drive
Hobbs, NM 88240

RICE *Operating*

P-25 Station Remediation Project Closure Report

Whole Earth Environmental
19606 San Gabriel
Houston, Tx. 77084

Executive Summary

Location
The site is situated approximately 1.5 miles northwest of Hwy. 208 west of Hobbs, New Mexico. The legal descriptions and geocoordinates are described on the attached plat map.

Site History
The site was used as a temporary storage station for four water disposal lines feeding a brine disposal system. The storage equipment has been made redundant by changes within the disposal system.

The main physical features at the site are one 28' diameter and one 15' diameter storage tank, a wellhead, an 8' diameter fiberglass chemical storage tank and an emergency overflow pit.

Land Use
The site is on New Mexico State Lands. The primary land use is oil and gas production. The topography is unremarkable.

Distance to Surface and Ground Water
There are no windmills, water pumps or surface waters within one mile of the facility. The vertical distance to groundwater is estimated to be between 44-55'.

Remediation Detail
Approximately 2,500 cubic yards of contaminated soil was excavated and transported to J&L Landfarms in Monument, New Mexico. The side-walls and bottom of each excavated area were tested for the presence of TPH, BTEX and chlorides under the supervision of Mr. Gary Wink of the Hobbs, New Mexico office of the OCD. Soil samples were collected in accordance with WEQP-77 (enclosed). All tested

concentrations were within the OCD guidelines. The site was backfilled with fresh topsoils transported from the J&L Landfarm and graded to replicate the original site topography.

District I
1625 N. French Drive, Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos, Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy, Minerals & Natural Resources Department
OIL CONSERVATION DIVISION
2040 South Pacheco
Santa Fe, NM 87505

Submit 1 copy to Appropriate District Office and 1 copy to Santa Fe Office

PIT REMEDIATION AND CLOSURE REPORT

Operator: RICE OPERATING COMPANY Telephone: 505-393-9174

Address: 122 West Taylor, Hobbs, NM 88240

Facility or: SWD P-25
Well Name

Location: Unit or Qtr/Qtr Sec SE/4 SE/4 Sec 25 T 18S R 37E County Lea

Pit type: Emergency Overflow Pit Permit # H-61; 2-Below-Grade Redwood Tanks (not permitted)

Land Type: BLM ____ State X ____ Fee ____ Other ____

Pit Location Pit Dimensions: length 44' width 27' depth 3.5'
(Attach diagram)

Reference: wellhead yes other ____

Footage from reference: SW Corner of pit is 35' East and then 62' North of Wellhead P-25

Direction from reference: ____ Degrees ____ East North ____
of
____ West South ____

Depth to Ground Water (Vertical distance from contaminants to seasonal high water elevation of ground water)	Less than 50 feet 50 feet to 99 feet Greater than 100 feet	(20 points) (10 points) (0 points)	20
Wellhead Protection Area (Less than 200 feet from a private domestic water source, or; less than 1000 feet from all other water sources)	Yes No	(20 points) (0 points)	0
Distance to Surface Water: (Horizontal distance to perennial lakes, ponds, rivers, streams, creeks, irrigation canals and ditches)	Less than 200 feet 200 feet to 1000 feet Greater than 1000 feet	(20 points) (10 points) (0 points)	0
	RANKING SCORE (TOTAL POINTS):		20

Date Remediation Started: January 4, 2000 Date Completed: January 15, 2000

Remediation Method: (Check all appropriate sections) Excavation Yes Approx. cubic yards 2400

Landfarmed No In-situ Bioremediation

Other Excavated material delivered to commercial landfarm.

All remaining in place hydrocarbons: natural attenuation

Remediation Location: (ie.: landfarmed onsite, name and location of offsite facility) Onsite Offsite J&L Landfarm, near Monument, NM

General Description of Remedial Action: Cleaned and dismantled below-grade redwood tanks and concrete bases. Excavated and disposed of highly impacted soil at the redwood sites and the overflow pit site. Excavation continued until bottoms and sidewalls of sites measured > 100ppm THP. Excavation was then backfilled with clean fill soil, surface was graded and re-seeded with natural-type vegetation. Test results and color photo reproductions are included in this closure package.

Ground Water Encountered: No X Depth

Final Pit Closure Sampling (if multiple samples, attach sample results and diagram of sample locations and depths)

Sample location See attached diagram. All analytical reports, CoC, etc., are included in the accompanying closure package submitted with this report.

Sample depth

Sample date all: 1-12-00; final 15B: 1-14-00 Sample time

Sample Results

Benzene (ppm) all <0.100mg/kg

Total BTEX (ppm) all <1.000 mg/kg; high of <0.687mg/kg (site 15S)

Field headspace (ppm)

TPH all <100mg/kg; high of <81mg.kg (final of site 15B)

Ground Water Sample: Yes No XX (If yes, attach sample results)

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

DATE January 27, 2000 PRINTED NAME CAROLYN DORAN HAYNES

SIGNATURE Carolyn Doran Haynes TITLE OPERATIONS ENGINEER

Submit 4 Copies
to Appropriate
District Office

DISTRICT I
P.O. Box 1980, Hobbs, NM 88241-1980

DISTRICT II
P.O. Drawer DD, Artesia, NM 88211-0719

DISTRICT III
1000 Rio Brazos Rd., Aztec, NM 87410

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-134
Aug. 1, 1989

OIL CONSERVATION DIVISION

P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Permit No. 14-61
(For Division Use Only)

APPLICATION FOR EXCEPTION TO DIVISION ORDER R-8952
FOR PROTECTION OF MIGRATORY BIRDS Rule 8(b), Rule 105(b), Rule 312(h), Rule 313, or Rule711(I)

Operator Name: Rice Engineering Corporation

Operator Address: 122 W. Taylor, Hobbs, New Mexico 88240

Lease or Facility Name SWD Well P-25 Location P 25 18S 37E
Ut. Ltr. Sec. Twp. Rge

Size of pit or tank: 44'x27'x3½' deep. approx. 700 bbls.

Operator requests exception from the requirement to screen, net or cover the pit or tank at the above-described facility.

x The pit or tank is not hazardous to migratory waterfowl. Describe completely the reason pit is non-hazardous.

The pit is used only in emergencies such as major well remedial work.

Normally kept empty.

1) If any oil or hydrocarbons should reach this facility give method and time required for removal:

Method: Vacuum truck

Time: Within 24 hrs. of discovery

2) If any oil or hydrocarbons reach the above-described facility the operator is required to notify the appropriate District Office of the OCD with 24 hours.

____ Operator proposes the following alternate protective measures:

CERTIFICATION BY OPERATOR: I hereby certify that the information given above is true and complete to the best of my knowledge and belief.

Signature S. A. Haktanir Title Division Manager Date July 25, 1990

Printed Name S. A. Haktanir Telephone No. 393-9174

FOR OIL CONSERVATION DIVISION USE

Date Facility Inspected 8/9/90

Inspected by

Approved by

Title

Date

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Originated 6/27/97

Submit Original
Plus 1 Copy
to Santa Fe

PIT INVENTORY FORM

Operator: RICE OPERATING COMPANY

Address: 122 WEST TAYLOR
HOBBS, NEW MEXICO 88240

Phone Number: (505) 393-9174

Previous Operator(s): Hobbs Salt Water Disposal System

Is the pit permitted: Yes ☐ No ☒

Unit Letter: P Section: 25 Township: 18S Range: 37E

County: Lea County

Location Name: Rice Operating Company Salt Water Disposal P-25 Well

Number of wells to the pit: Truck Terminal (Varies)

Are the wells to the pit operated by one operator ☐ or multiple operators ☒

Total daily volume (in barrels) to the pit: 0

Pit Type: I-Below ground redwood terminal tank
(Emergency, Production, Workover, Reserve/Drilling(greater than 6 months old), Flare, Blowdown, Seperator, Dehydrator, Line Drip, BS&W/Tank Bottoms, Compressor, Pigging, Washdown, or other)

What types of wastes are accepted in the pit (Exempt, Non-exempt, Both, None): Exempt(production water)

Pit age (years): 30

Is the pit lined ☒ or unlined ☐

Type of liner (None, Synthetic, Clay) : Redwood tank resting on concrete pad

Is leak detection present: Yes ☒ No ☐ Observation boxes around tanks

Is the pit netted: Yes ☒ No ☐ Covered with redwood top

Pit dimensions (LxWxD): 28'dia X 8'Ht

CERTIFICATION

I hereby certify that the information submitted is true and correct to the best of my knowledge and belief.

Name: Roger Hall Title: Operations Engineer

Signature: Roger Hall Date: 10/31/97

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Originated 6/27/97

Submit Original
Plus 1 Copy
to Santa Fe

PIT INVENTORY FORM

Operator: Rice Operating Company

Address: 122 West Taylor

Hobbs, New Mexico 88240

Phone Number: (505) 393-9174

Previous Operator(s): Hobbs Salt Water Disposal System

Is the pit permitted: Yes [X] No [ ]

Unit Letter: P Section: 25 Township: 18 South Range: 37 East

County: Lea County

Location Name: Salt Water Disposal Well P-25

Number of wells to the pit: 1

Are the wells to the pit operated by one operator [X] or multiple operators [ ]

Total daily volume (in barrels) to the pit: None

Pit Type: Emergency

(Emergency, Production, Workover, Reserve/Drilling(greater than 6 months old), Flare, Blowdown, Seperator, Dehydrator, Line Drip, BS&W/Tank Bottoms, Compressor, Pigging, Washdown, or other)

What types of wastes are accepted in the pit (Exempt, Non-exempt, Both, None): Exempt (produced water)

Pit age (years): 35 yrs.

Is the pit lined [ ] or unlined [X]

Type of liner (None, Synthetic, Clay): None

Is leak detection present: Yes [ ] No [X]

Is the pit netted: Yes [ ] No [X]

Pit dimensions (LxWxD): 44'X27'X3½'

CERTIFICATION

I hereby certify that the information submitted is true and correct to the best of my knowledge and belief.

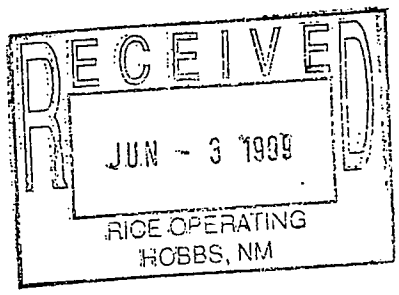
Name: Roger Hall Title: Operations Engineer

Signature: Roger Hall Date: 10/28/97

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

June 1, 1999



CERTIFIED MAIL
RETURN RECEIPT NO. Z 357 870 131

Carolyn Doran Haynes
Rice Operating Company
122 West Taylor
Hobbs, NM 88240

Re: Closure Work Plan for Existing Pits and Below-Grade Redwood Tanks (Generic Closure Work Plan) for Rice Operating Company's saltwater disposal system facilities.

Dear Ms. Haynes:

The New Mexico Oil Conservation Division (NMOCD) has reviewed Rice Operating Company's (ROC) closure work plans dated March 22, 1999 and revisions to the plans dated April 23, 1999 for the saltwater disposal system facilities. **The NMOCD Hereby approves the plans subject to the following conditions:**

1. ROC shall complete all monitor well(s) as follows:

   a. At least 15 feet of well screen shall be placed across the water table interface with 5 feet of the well screen above the water table and 10 feet of the well screen below the water table.

   b. An appropriately sized gravel pack shall be set in the annulus around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.

   c. A 2-3 foot bentonite plug shall be placed above the gravel pack.

   d. The remainder of the hole shall be grouted to the surface with cement containing 3-5% bentonite.

   e. A concrete pad shall be placed at the surface around the well. The well shall be installed with a suitable protective locking device.

   f. The well(s) shall be developed after construction using EPA approved procedures.

2. No less than 48 hours after the well(s) are developed, ground water from all monitor well(s) shall be purged, sampled and analyzed for concentrations of benzene, toluene, ethyl benzene, xylene, polycyclic aromatic hydrocarbons (PAH's), total dissolved solids (T.S.) and New Mexico Water Quality Control Commission (WQCC) metals and major cations and anions using EPA approved methods and quality assurance/quality control (QA/QC) procedures.

3. ROC shall notify OCD pursuant to Rule 116 upon discovery of groundwater contamination.

4. All final soil samples submitted for laboratory analyses shall be sampled for BTEX (8021), TPH (418.1 or 8015 GRO & DRO) and Chlorides.

5. ROC will notify the OCD Santa Fe office and the OCD District office at least 48 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples during OCD's normal business hours.

6. ROC is required to sample and provide to NMOCD the analytical test results for each side wall and bottom of any excavated areas. The samples taken shall be tested for BTEX (8021), TPH and Chlorides. Composite samples will be allowed if there are no obvious hot spots. TPH methods can be EPA 418.1, or 8015 if both GRO and DRO are ran. All sampling and testing shall be pursuant to approved EPA methods and procedures.

7. All wastes generated during the investigation shall be disposed of at an OCD approved site.

8. ROC shall submit a report of the investigations to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office. ROC must receive NMOCD approval before commencing backfilling, liner or new equipment installations. The report shall include the following:

    a. A description of all investigations, remediation and monitoring activities which have occurred including conclusions , recommendations, risk assessments and request for implementation of any future work and/or closure.

    b. A geologic/lithologic log and well completion diagram for all soil borings and/or monitor well(s).

    c. Vertical and horizontal Isopleth maps for remaining contaminants of concern which were observed during the investigations.

e. Summary tables of all soil and/or ground water quality sampling results and copies of all laboratory analytical data sheets and associated QA/QC data collected.

f. The quantity and disposition of all wastes generated.

Please be advised that NMOCD approval of this plan does not relieve ROC of liability should their investigations and/or operations fail to adequately investigate and/or remediate contamination that poses a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve ROC of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,

Wayne Price-Pet. Engr. Spec.
Environmental Bureau

cc: OCD Hobbs Office

RICE *Operating Company*
122 West Taylor • Hobbs, NM 88240
Phone: (505) 393-9174 • Fax: (505) 397-1471

April 23, 1999

Mr. Wayne Price
NM Energy, Minerals and Natural Resources Department
Oil Conservation Division, Environmental Bureau
2040 S. Pacheco
Santa Fe, NM 87505

Re: Revision of Closure Work Plan for Existing Pits and Below-Grade Redwood Tanks

Mr. Price:

Enclosed are the revised Closure Plans for Below Grade Redwood Tanks and for Permitted Emergency Pits. The revisions concern changes in items #3B, #8 and #10 for the Below Grade Redwood tanks and items #4B, #6 and #8 for the Permitted Emergency Pits, as directed by our telephone conversation of April 22, 1999, and your subsequent e-mail.

It is important to reiterate that **all activities** pertaining to closure of emergency pits and replacement of the redwood tanks will be conducted **pursuant to NMOCD guidelines**. All site assessments, work plans, time schedules, sample and test plans, impacted soil removal, replacement tankage and facilities, etc., will be specifically fitted to the particular site applying for closure but will generally follow these generic plans. NMOCD will be notified in advance of significant occasions and will be consulted throughout the closure process for concurrence of plan alterations, assessment and analytical interpretations, etc.

Also enclosed are preliminary generic drafts of the open, below-ground-level replacement tank facility that you requested. The elevation of the collection vessel is vital to the system's gravity-flow capability, and in most cases, the replacement tank facility must remain at the same lower-than-surface elevation as the redwood tanks. Each site will be assessed for elevation limitations and the replacement facility will be designed accordingly. Rice Operating Company proposes to contain new tanks and piping within a concrete, sealed and frequently inspected (for integrity) vault-like enclosure, thus insuring future impact minimization to the environment and the public.

Thank you,

Carolyn Doran Haynes

Carolyn Doran Haynes
Operations Engineer

Enclosures
Cc KH; JC; file; Ms. Donna Williams, OCD District I, Hobbs, NM

RICE *Operating Company*
122 West Taylor • Hobbs, NM 88240
Phone: (505) 393-9174 • Fax: (505) 397-1471

March 22, 1999

Mr. Wayne Price
NM Energy, Minerals and Natural Resources Department
Oil Conservation Division, Environmental Bureau
2040 S. Pacheco
Santa Fe, NM 87505

Re: Closure Work Plan for Existing Pits and Below-Grade Redwood Tanks

Mr. Price:

Enclosed are copies of emergency pit permits and below grade redwood tank installations for our operations in Lea County, New Mexico, that were previously submitted to NMOCD in October, 1997. This documentation serves as a list of facilities operated by Rice Operating Company (ROC) that contain or have contained pits or below grade tanks.

Closure plans for two locations, F-29 and H-35, are in process with the OCD now. The generic "Closure Plan for Below Grade Redwood Tanks" detailed below will accommodate the systematic closure of existing ROC operated below-grade redwood tanks. The existing emergency pits will be closed pursuant to the generic "Closure Plan for Permitted Emergency Pits", also detailed below. It is expected that at facilities containing both, the below-grade redwood tank (s) and the emergency pit will be closed at the same time, but under separate closure plans and closure reports.

Rice Operating Company is the service provider (operator) for these salt-water disposal systems in SE NM. Rice Operating has no ownership of any of the pipelines, wells, or facilities. Each system is owned by a consortium of oil producers and they are called "System Partners," and the System Partners provide all operating capital on a percentage ownership/usage basis. Each location will independently require System Partner AFE approval and advance billing for the closure funds. Only after funds are received can closure work begin.

Thank you,

COPY

Carolyn Doran Haynes
Operations Engineer

Cc KH; JC; file; Ms. Donna Williams, OCD District I, Hobbs, NM

REVISED
4-23-99

Closure Plan for Below Grade Redwood Tank

1. Submit C-103 form to NMOCD along with the site-specific location, site assessment, work plan, time schedule, sampling and testing plan, etc., all pursuant to NMOCD guidelines.

2. Procure soil samples from 3' below bottom of tanks (9-11' below grade) at tank sides.
   A. If soil samples are < 100ppm TPH and < 250ppm Chlorides, proceed to Step 4.
   B. If soil samples are > 100ppm THP or > 250ppm Chlorides, proceed to Step 3.

3. Delineate any portion of tank site that is > 100ppm TPH or > 250ppm Chlorides with a backhoe or soil boring machine, obtaining samples for field and lab analysis at 5' intervals.
   A. When field analysis of bored-sample determines < 100ppm TPH and < 250ppm Cl, boring will be suspended pending laboratory analysis confirmation. Proceed to Step 4.
   B. If these parameter levels are not identified, then boring and sampling will continue to ground water. Upon reaching groundwater, the borehole will be cased and developed. Ground water samples will be procured and tested for major cations and anions, TDS and BETX levels. If ground water is found to exceed the WQCC standards, NMOCD will be notified immediately and the closure plan will move into Rule 19 procedures.

4. Write AFE to System Partners as directed by results of delineation of redwood tank site and of emergency pit (if both are at facility). Await approval and funding for site closing.

5. Move onto SWD facility site with temporary tank system. Re-route fluid flow from below grade redwood tanks into the temporary tank system. Plumb to SWD well.

6. Empty and clean redwood tanks, properly disposing of any BS & W. Excavate sides of redwood tanks to allow for working space to manipulate tank support banding. Remove redwood tanks reserving boards for proper disposal.

7. Excavate ramp into redwood tank hole. Remove and properly dispose of concrete base.

8. Remove impacted soil (as practical) to eliminate hot spots; dispose per NMOCD guidelines.

9. Procure random 5-point composite bottom sample from 3'below tank bottom and random 4-point composite side sample for lab TPH, Benzene, and BTEX testing.
   A. If <100ppm TPH; BTEX, Benzene <10ppm; <250ppm Chlorides; proceed to Step 11.
   B. If >100ppm TPH; BTEX, Benzene >10ppm; >250ppm Chlorides; in the vadose zone but not reaching groundwater, proceed to Step 10.

10. Evaluate site for risk assessment: propose to excavate hole bottom and sides as practical to minimize risk; install 40-mil polyethylene liner on sanded bottom, graded to direct moisture accumulation away from the impacted area; cover and compact bottom with 2' sand fill.

11. Apply to NMOCD for closure of redwood tank site per NMOCD guidelines and site results.

12. After approval is received, proceed with installation of new fiberglass or steel tanks and appropriate plumbing changes within engineered secondary containment system.

REVISED
4-23-99

Closure Plan for Permitted Emergency Pits

1. Submit C-103 form to NMOCD along with the site-specific location, site assessment, work plan, time schedule, sampling and testing plan, etc., all pursuant to NMOCD guidelines.

2. Remove and properly dispose of visibly contaminated soil pursuant to NMOCD guidelines.

3. Procure soil samples from surface and 3' below excavation bottom and excavation sides.
   A. If soil samples are < 100ppm TPH and < 250ppm Chlorides, proceed to Step 6.
   B. If soil samples are > 100ppm THP or > 250ppm Chlorides, proceed to Step 4.

4. Delineate any portion of excavation that is > 100ppm TPH or > 250ppm Chlorides with a backhoe or soil boring machine, obtaining samples for field and lab analysis at 5' intervals.
   A. When field analysis of bored-sample determines < 100ppm TPH and < 250ppm Cl, boring will be suspended pending laboratory analysis confirmation. Proceed to Step 5.
   B. If these parameter levels are not identified, then boring and sampling will continue to ground water. Upon reaching groundwater, the borehole will be cased and developed. Ground water samples will be procured and tested for Chloride and BETX levels. Ground water samples will be procured and tested for major cations and anions, TDS and BETX levels. If ground water is found to exceed the WQCC standards, NMOCD will be notified immediately and the closure plan will move into Rule 19 procedures.

5. Write AFE to System Partners as directed by results of delineation of redwood tank site and of emergency pit (if both are at facility). Await approval and funding for site closing

6. Remove impacted soil (as practical) to eliminate hot spots; dispose per NMOCD guidelines.

7. Procure random 5-point composite bottom sample and random 4-point composite side sample for laboratory TPH, Benzene, and BTEX testing.
   A. If <100ppm TPH; BTEX, Benzene <10ppm; <250ppm Chlorides; proceed to Step 9.
   B. If >100ppm TPH; BTEX, Benzene >10ppm; >250ppm Chlorides; in the vadose zone but not reaching groundwater, proceed to Step 8.

8. Evaluate site for risk assessment. Excavate bottom and sides to a depth and width that is deemed practical by soil analytical results. Install a 40-mil polyethylene liner on bottom, graded to provide water run-off away from the contamination left in place below the liner; cover and compact over the liner with 1-2' of sand fill.

9. Apply to NMOCD for closure of permitted emergency pit site per NMOCD guidelines and site results.

10. After approval is received, proceed with backfill and grading of pit site with clean soil and/or appropriately blended soil compatible with the on-site soil.

NEW MEXICO ONE CALL SYSTEM, INC
ONE CALL FORM

Person Calling: CAROLYN HAYNES		Company Name/Code: **Rice Operating Company**	
Contact Person: Same / Regie		Phone: **(505) 393-9174**	
Town: HOBBS			
Address:			
Range: 37	Township: 18	Section: 25	Quarter: SE
Work Done By: Whole Earth		For: RICE OP.	
Type of Excavation: Environmental Remediation		Nature of Work: Environmental	
Due Date: 1-4-2000	Time: 8 AM	For 5 Working Days	
Remarks: Carlsbad Hwy West of Hobbs Turn North on dirt road between Davis Tool + McVay Drilling (about 1 mile west of last Stop light) go approx 1.1 mile N. Excavation site is on the West side of Road - area is surrounded by temp. fence Spot entire fenced-in area			
Grid Code:		Request Number: line locate request # 991230141502 61	

Navaho 748 3311
Rice
GPM - 397-5541
Zia - 392-4277

NEW MEXICO STATE LAND OFFICE

SALT WATER DISPOSAL EASEMENT

SALT WATER DISPOSAL
EASEMENT NO. **SWD-041**

THIS AGREEMENT, dated this 25th day of September, 1998, made and entered into between the State of New Mexico, acting by and through the undersigned, its Commissioner of Public Lands, hereinafter called the grantor, and Rice Operating Company, 122 West Taylor, Hobbs, New Mexico, 88240, hereinafter called the grantee,

WITNESSETH:

That, whereas, the said grantee has filed in the Land Office an application for salt water disposal easement and has tendered the sum of $600.00, together with the sum of $30.00 application fee;

NOW, THEREFORE, in consideration of the foregoing tender, receipt of which is acknowledged, and the covenants herein, grantor does grant to the grantee a salt water disposal easement for the sole and only purpose of underground disposal of salt water produced in connection with oil and gas operations, together with the right to make such reasonable use of the land as may be necessary to dispose of said salt water. Said easement shall cover the following described lands:

INSTITUTION	SECTION	TOWNSHIP	RANGE	SUBDIVISION	ACRES
D.D. & B.	25	18S	37E	Portion Within SE¼SE¼	3.00

TO HAVE AND TO HOLD said lands and privileges hereunder for a term of Two years from the date first above written, subject to all terms and conditions hereinafter set forth:

1. Grantee shall pay the grantor the sum of $600.00 annually, in advance.

2. With the consent of the grantor and payment of a fee of $30.00, the grantee may surrender or relinquish this salt water disposal easement to the grantor; provided, however, that this surrender clause shall become absolutely inoperative immediately and concurrently with the filing of any suit in any court or law or equity by the grantor or grantee or any assignee to enforce any of the terms of this salt water disposal easement.

3. The grantee, with the prior written consent of the grantor, may assign his salt water disposal easement in whole only. Upon approval of the assignment, in writing, by the grantor, the grantee shall stand relieved from all obligations to the grantor with respect to the lands embraced in the assignment, and the grantor shall likewise be relieved from all obligations to the assignor as to such tracts, and the assignee shall succeed to all of the rights and privileges of the assignor with respect to such tracts and shall be held to have assumed all of the duties and obligations of the assignor to the grantor as to such tracts.

4. The grantor may cancel this salt water disposal easement for non-payment of annual consideration or for violation of any of the terms and covenants hereof; provided, however, that before any such cancellation shall be made, the grantor must mail to the grantee or assignee, by registered mail, addressed to the post office address of such grantee or assignee, shown by the records, a thirty-day notice of intention to cancel said salt water disposal easement, specifying the default for which the salt water disposal easement is subject to cancellation. No proof of receipt of notice shall be necessary and thirty days after such mailing, the grantor may enter cancellation unless the grantee shall have sooner remedied the default.

5. The grantee shall furnish copies of records and such reports and plats of his operations, including any and all data relating to geological formations as the grantor may reasonably deem necessary to his administration of the lands.

6. Grantee may make or place such improvements and equipment upon the land as may reasonably be necessary to dispose of salt water, and upon termination of this salt water disposal easement for any reason, grantee may remove such improvements and equipment as can be removed without material injury to the premises; provided, however, that all sums due the grantor have been paid and that such removal is accomplished within one year of the termination date or before such earlier date as the grantor may set upon thirty days written notice to the grantee. All improvements and equipment remaining upon the premises after the removal date, as set in accordance with this paragraph, shall be forfeited to the grantor without compensation. All pipelines constructed hereunder shall be buried below plow depth.

7. This salt water disposal easement is made subject to all the provisions and requirements applicable thereto which are to be found in various acts of the legislature of New Mexico and the rules of the Commissioner of Public Lands of the State of New Mexico, the same as though they were fully set forth herein, and said laws and rules, so far as applicable to this salt water disposal easement, are to be taken as a part hereof.

8. All the obligations, covenants, agreements, rights and privileges of this salt water disposal easement shall extend to and be binding and inure to the benefit of the lawful and recognized assigns or successors in interest of the parties hereto.

9. Grantee shall post with grantor a bond or undertaking in an amount required by grantor in favor of the owner of improvements lawfully located upon the lands herein to secure payment of damage, if any, done to such improvements by reason of grantee's operations.

10. Payment of all sums due hereunder shall be made at the office of the Commissioner of Public Lands, 310 Old Santa Fe Trail, P. O. Box 1148, Santa Fe, New Mexico 87504-1148.

11. Grantee, including his heirs, assigns, agents, and contractors shall at their own expense fully comply with all laws, regulations, rules, ordinances, and requirements of the city, county, state, federal authorities and agencies, in all matters and things affecting the premises and operations thereon which may be enacted or promulgated under the governmental police powers pertaining to public health and welfare, including but not limited to conservation, sanitation, aesthetics, pollution, cultural properties, fire, and ecology. Such agencies are not to be deemed third party beneficiaries hereunder; however, this clause is enforceable by the grantor as herein provided or as otherwise permitted by law.

12. Grantee shall save and hold harmless, indemnify and defend the State of New Mexico, the Commissioner of Public Lands, and his agent or agents, in their official and individual capacities, of and from any and all liability claims, losses, or damages arising out of or alleged to arise out of or indirectly connected with the operations of grantee hereunder, off or on the herein above described lands, or the presence on said lands of any agent, contractor or sub-contractor of grantee.

AFFIRMATION OF GEOLOGIC, ENGINEERING & HYDROLOGIC INVESTIGATION: I hereby affirm that the available geologic and engineering data have been examined and no evidence has been found of open faults or any other hydrologic connection between the disposal zone and any underground source of drinking water.

IN WITNESS WHEREOF, the State of New Mexico has hereunto signed and caused its name to be signed by its Commissioner of Public Lands, thereunto duly authorized with the seal of his office affixed, and the grantee has signed this agreement to be effective the day and year above written.

STATE OF NEW MEXICO

BY: Ray Powell Zilla Porter Padilla Director
RAY POWELL, M.S., D.V.M.
COMMISSIONER OF PUBLIC LANDS

BY: Loy B. Goodheart President
GRANTEE

(PERSONAL ACKNOWLEDGMENT)

STATE OF _____)
) ss.
COUNTY OF _____)

The foregoing instrument was acknowledged before me this _____ day of

_____, 19____, by _____

_____.

(ACKNOWLEDGMENT BY ATTORNEY-IN-FACT)

STATE OF _____)
) ss.
COUNTY OF _____)

The foregoing instrument was acknowledged before me this _____ day of

_____, 19____, as attorney-in-fact on behalf of

_____.

(ACKNOWLEDGMENT BY CORPORATION)

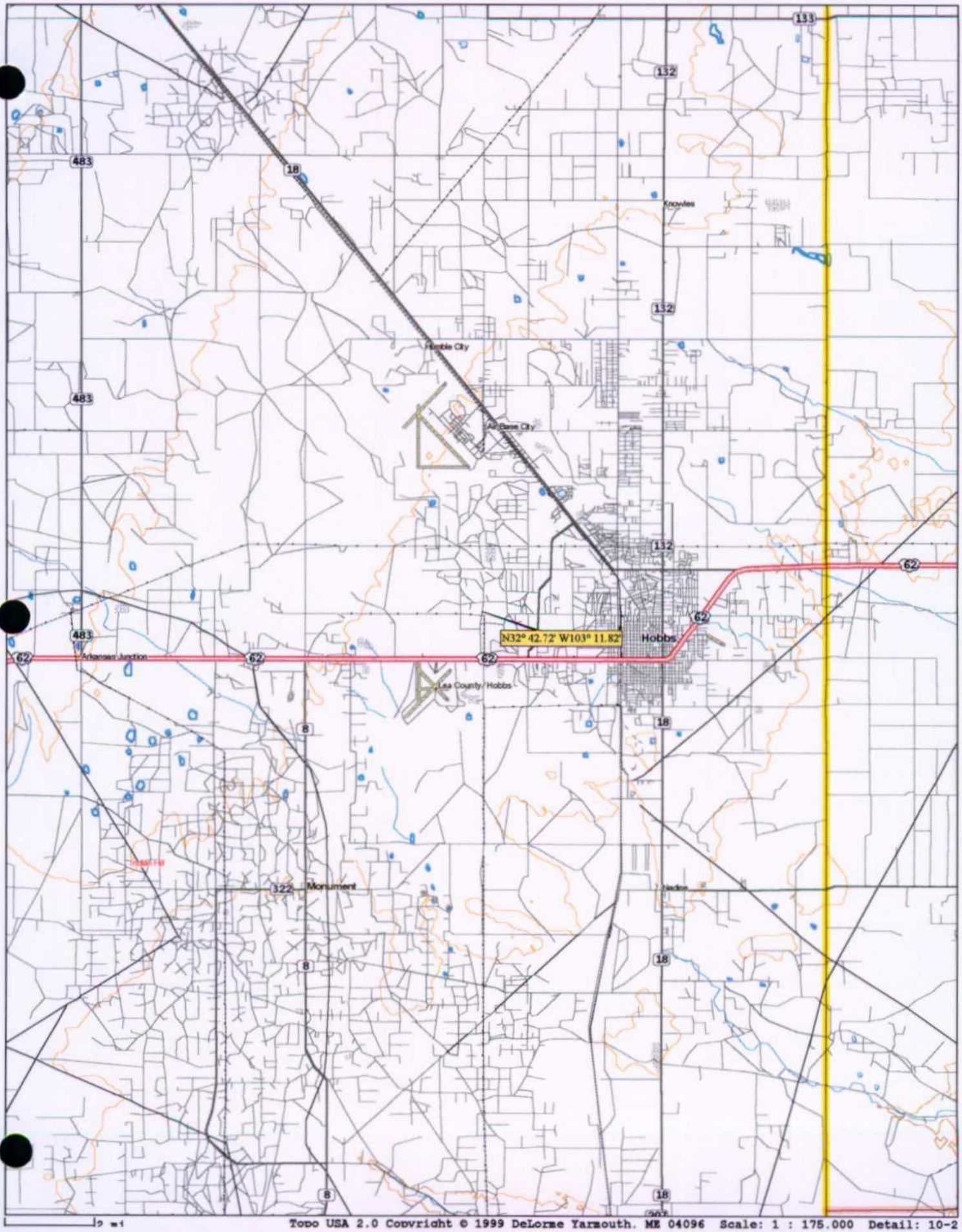
STATE OF New Mexico)
) ss.
COUNTY OF Lea)

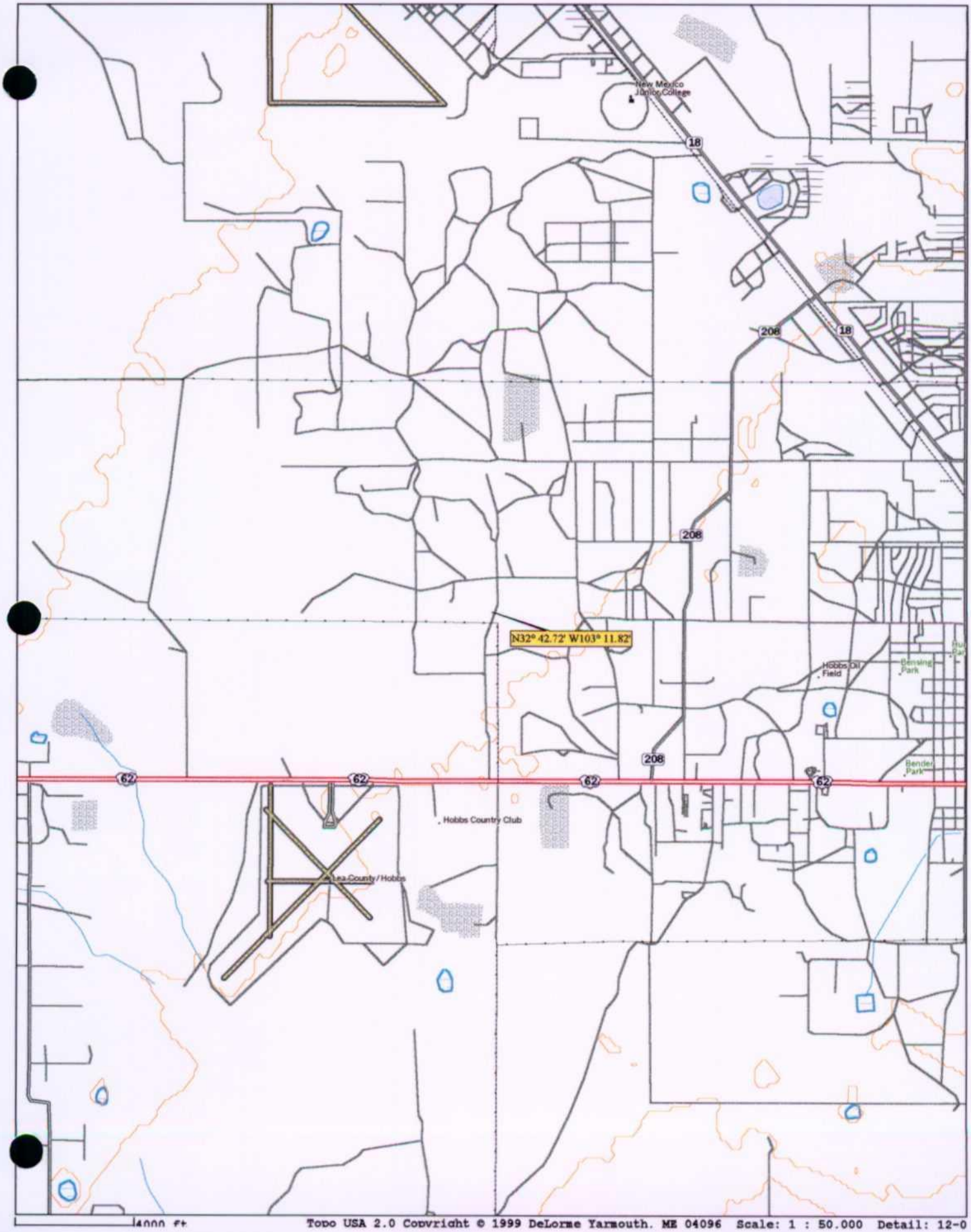
The foregoing instrument was acknowledged before me this 16th day

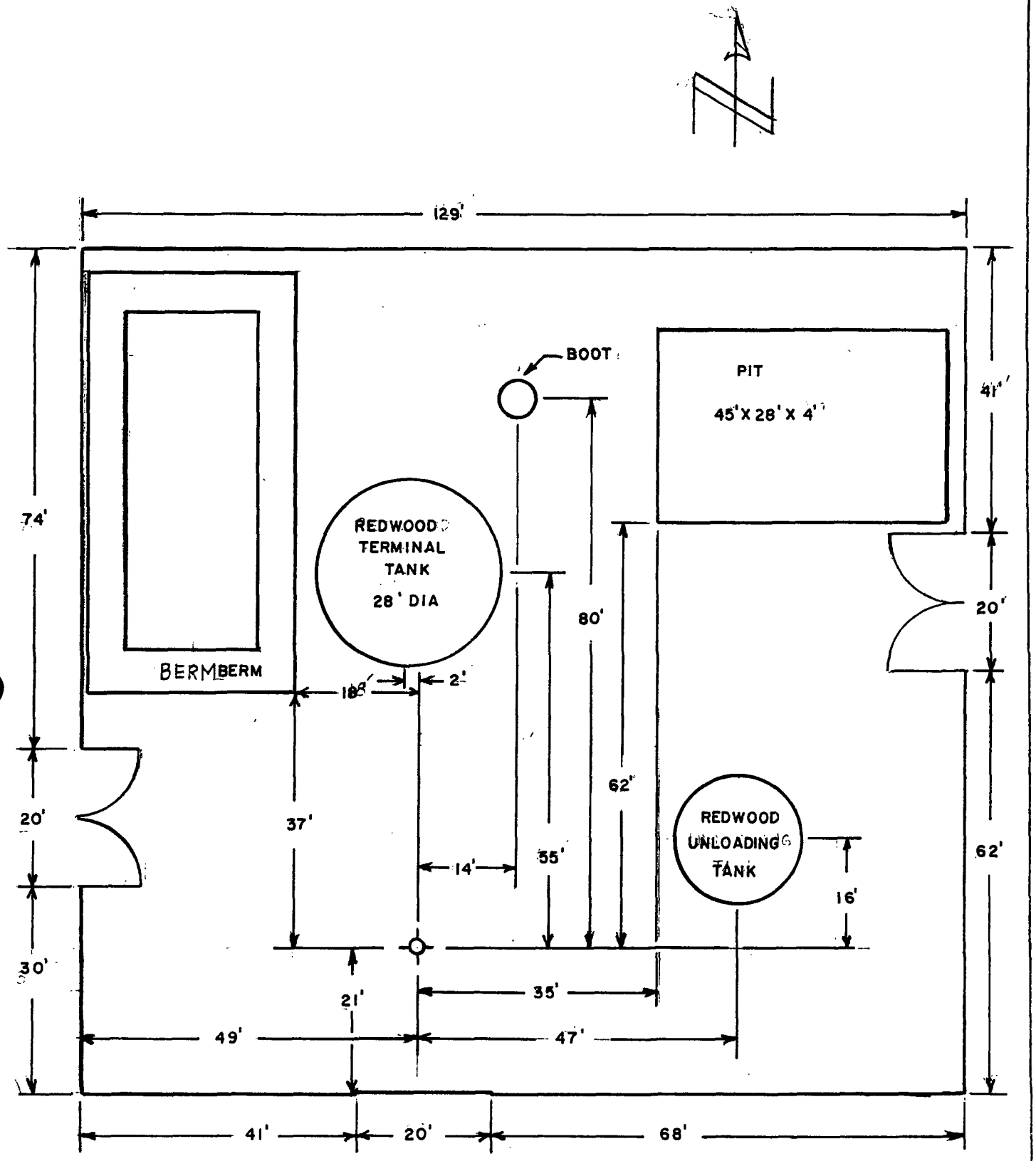
of September, 19 98, by Loy B. Goodheart (NAME), President (TITLE)

of Rice Operating Company (CORPORATION).

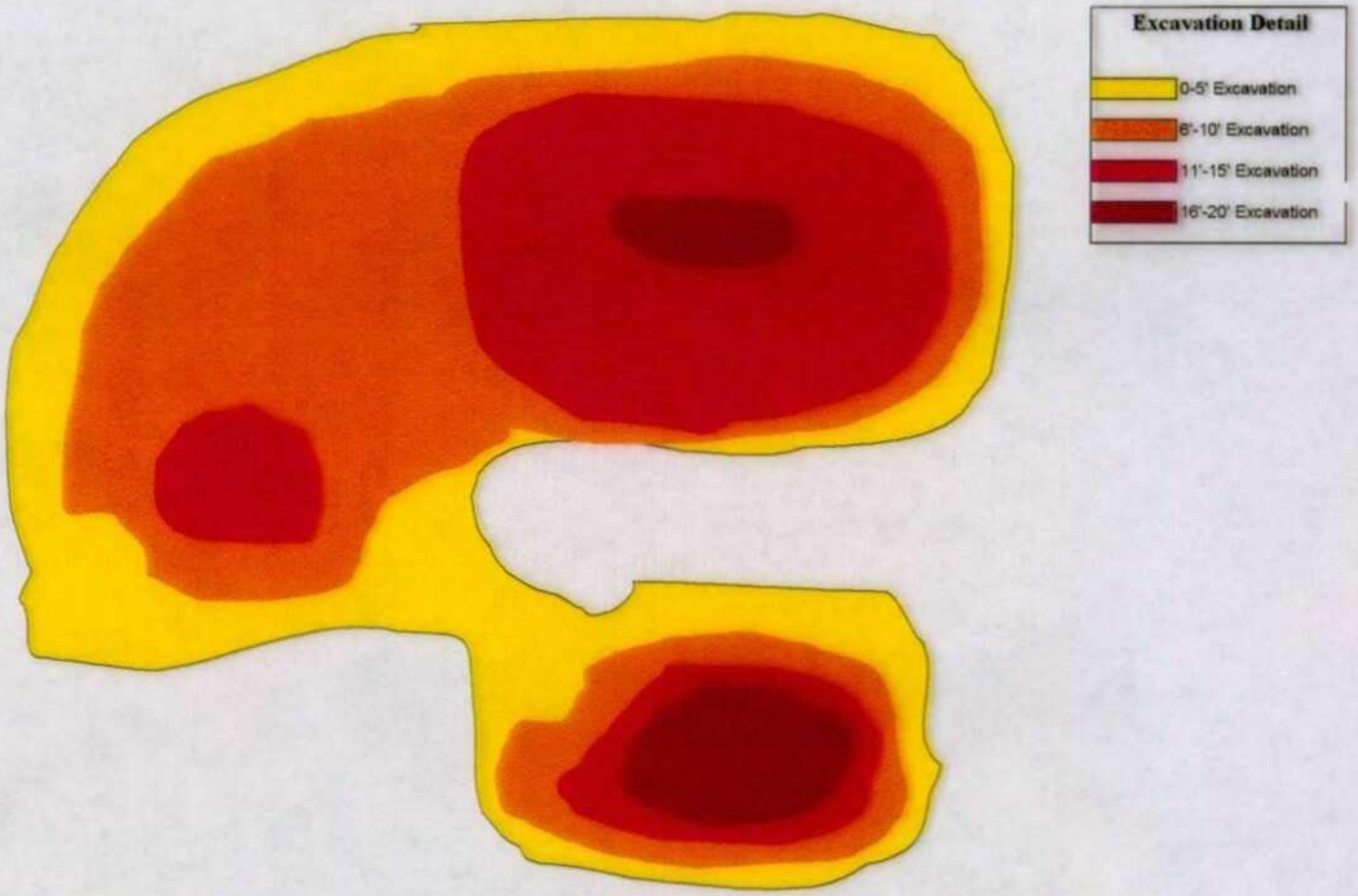
My Commission Expires: 2-16-2002 Notary Public: Jo Ann Duell


133
132
483
18
Knowles
Eagle City
Air Base City
483
132
62
N32° 42.72' W103° 11.82'
Hobbs
483
62
62
62
Arkansas Junction
Lea County / Hobbs
8
18
322
Monument
8
18
8
18
Todo USA 2.0 Copyright © 1999 DeLorme Yarmouth, ME 04096 Scale: 1 : 175,000 Detail: 10-2


New Mexico Junior College
18
208
18
208
N32° 42.72' W103° 11.82'
Hobbs Oil Field
Bensing Park
208
62
62
62
62
Bender Park
Hobbs Country Club
Lea County / Hobbs
4000 ft
Topo USA 2.0 Copyright © 1999 DeLorme Yarmouth, ME 04096 Scale: 1 : 50.000 Detail: 12-0

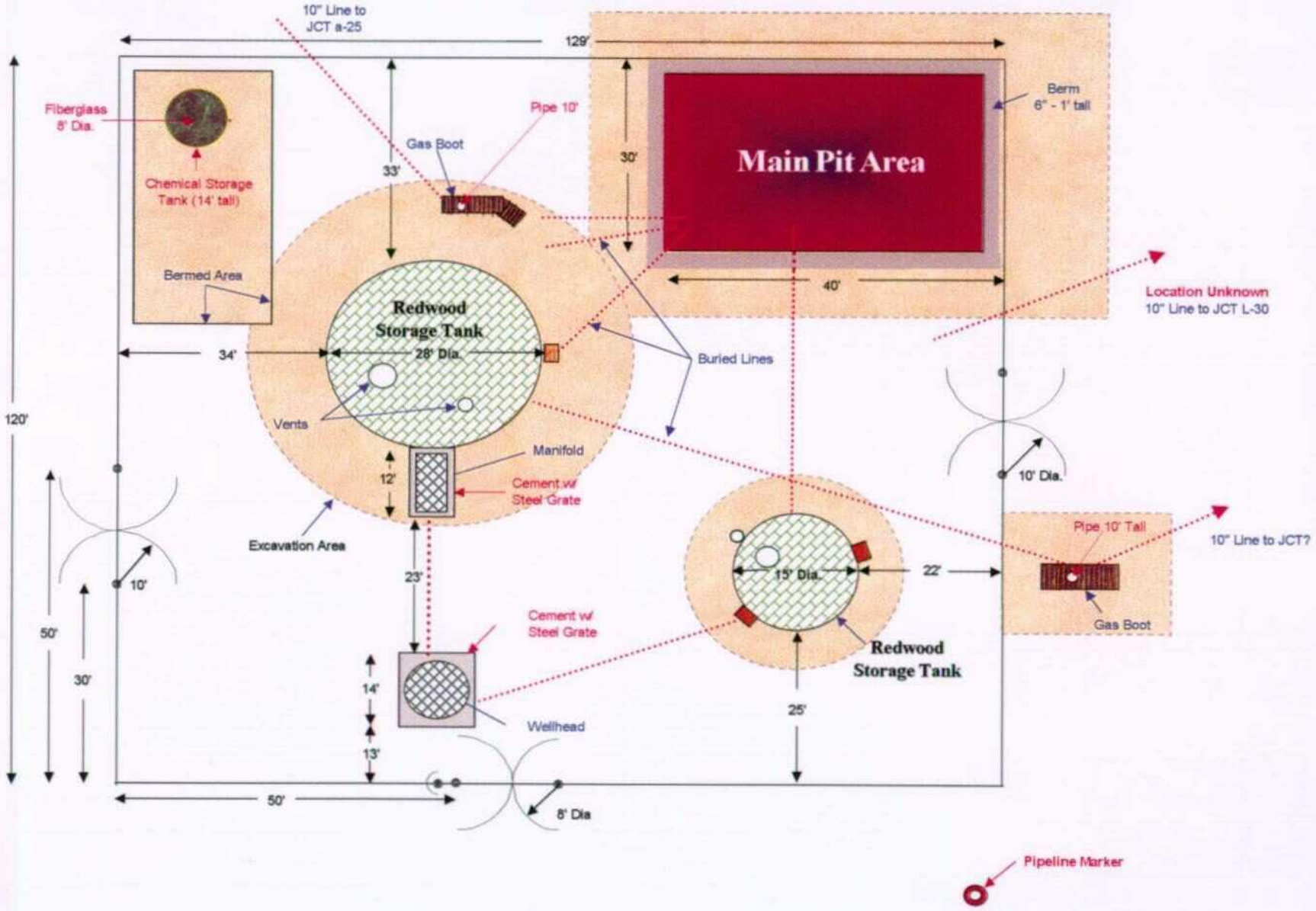


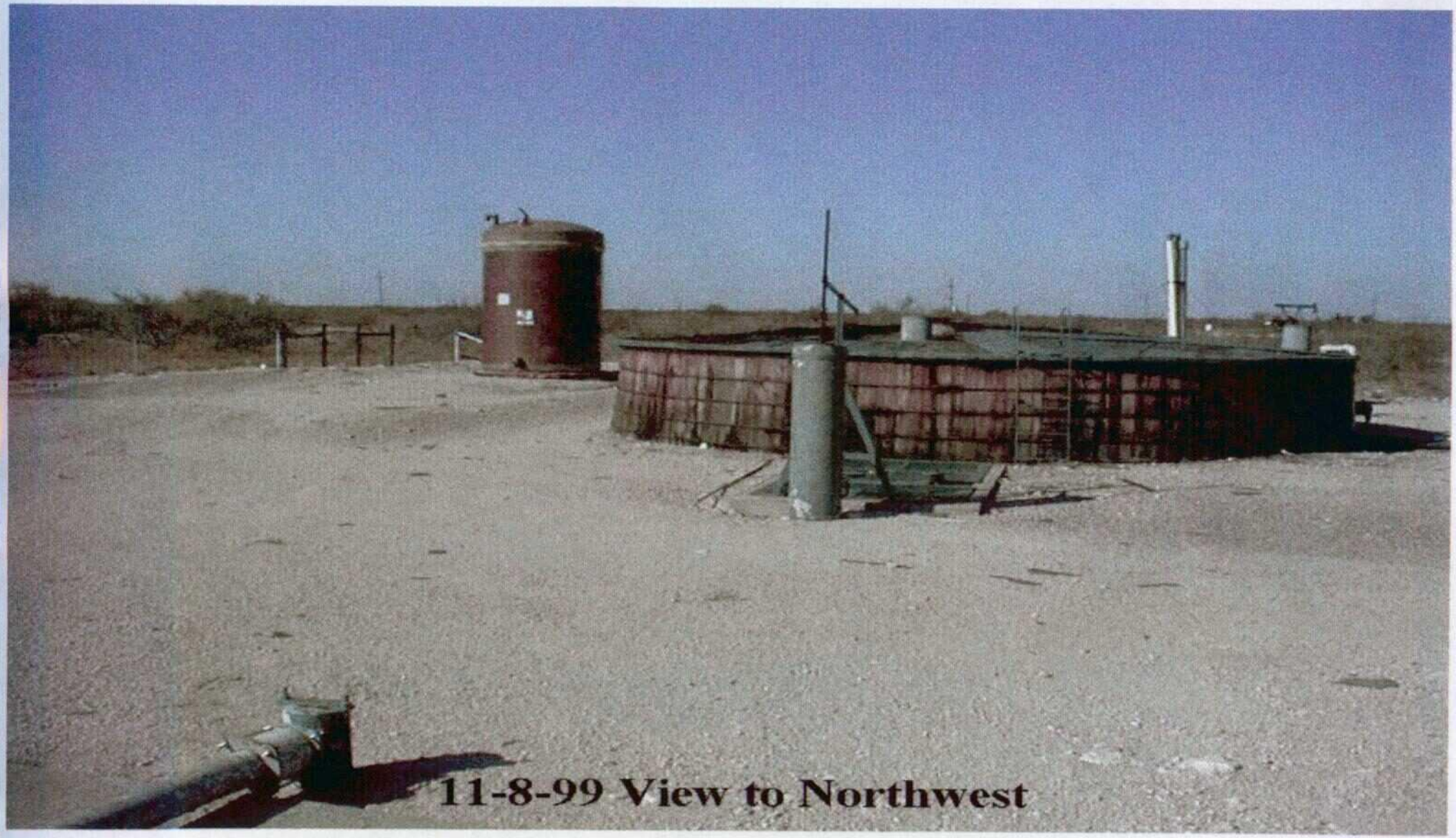
DWN	SRT	11-24-99	HOBBS SWD SYSTEM WELL P-25 FACILITIES	SCALE 1" = 20'
			Rice Engineering & Operating, Inc. Hobbs, New Mexico	DWG NO. A-583-1


Excavation Detail
0-5' Excavation
6'-10' Excavation
11'-15' Excavation
16'-20' Excavation

RICE *Operating Company*

Well No. P-25
SE / 4 SE / 4
T18S R 37E





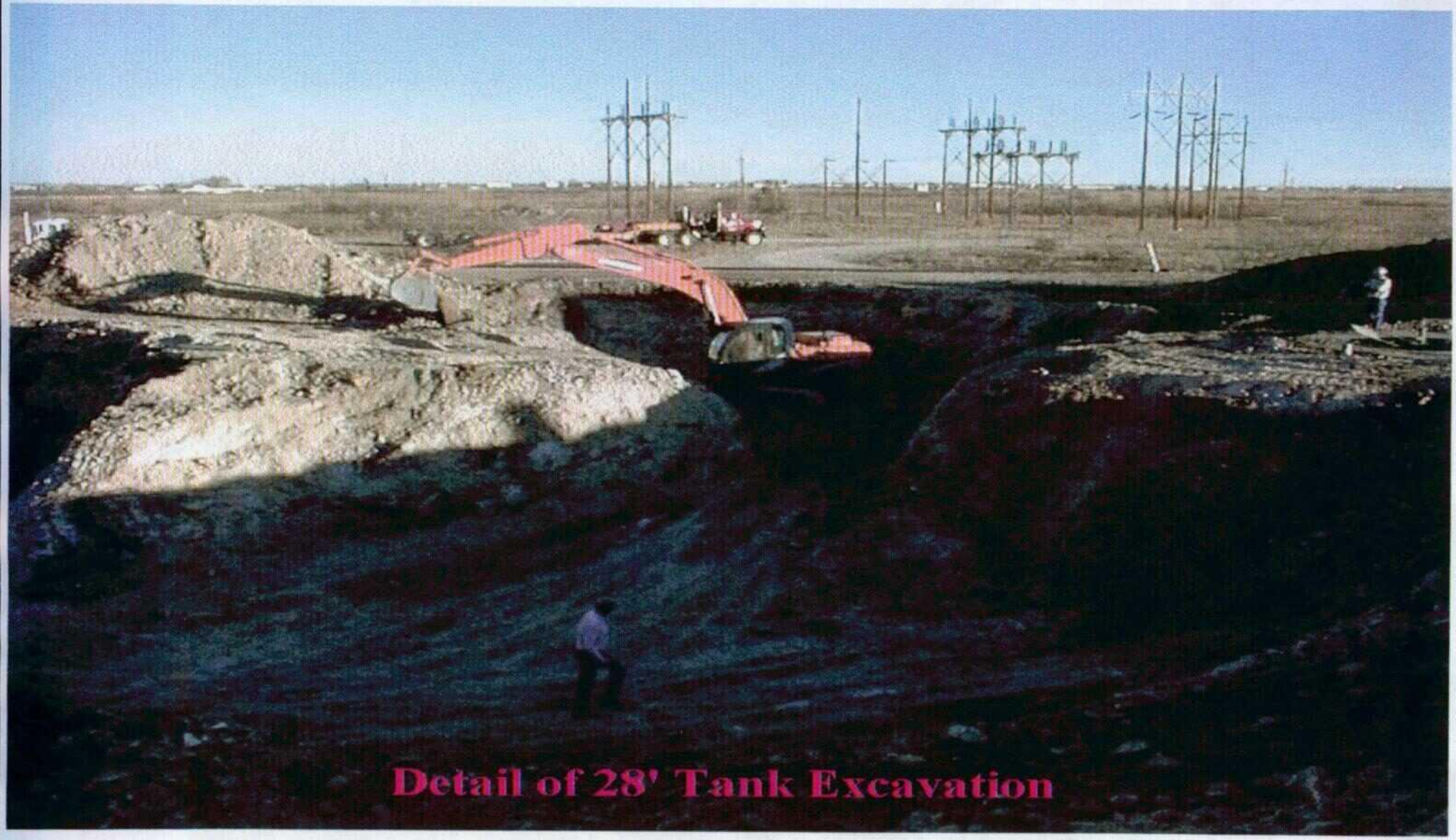
11-8-99 View to Northwest

11-8-99 View to Southwest


11-8-99 View to West

11-8-99 Emergency Upset
Pit Area View to Northeast

Main Pit Excavation Detail



Detail of 28' Tank Excavation


Final Contour Detail


Final Contouring Detail

Protocol

This section contains a copy of the remediation protocol used on this project.

Remediation Protocol
Rice Operating Company
Site P-25

1.0 Purpose

This protocol is to provide a detailed outline of the steps to be employed in the remediation of a pit located west of Hobbs, New Mexico.

2.0 Scope

This protocol is site specific for the Rice Operating remediation project.

3.0 Preliminary

Prior to any field operations, Whole Earth Environmental shall conduct the following activities:

3.1 Client Review

3.1.1 Whole Earth shall meet with cognizant personnel within Rice to review this protocol and make any requested modifications or alterations.

3.1.2 Changes to this protocol will be documented and submitted for final review by Client prior to the initiation of actual field work.

4.0 Safety

4.1 Prior to work on the site, Whole Earth shall obtain the location and phone numbers of the nearest emergency medical treatment facility. We will review all safety related issues with the appropriate Client personnel, sub-contractors and exchange phone numbers.

4.2 A tailgate safety meeting shall be held and documented each day. All sub-contractors must attend and sign the daily log-in sheet.

4.3 Anyone allowed on to location must be wearing sleeved shirts, steel toed boots, and long pants. Each vehicle must be equipped with two way communication capabilities.

4.4 Prior to any excavation, New Mexico One Call will be notified. The One Call notification number will be included within the closure report. If lines are discovered within the area to be excavated they shall be marked with pin flags on either side of the line at maximum five foot intervals.

5.0 Remediation Procedure

5.1 All soils containing a TPH concentration >100 ppm, chlorides > 250 ppm and all soils containing a benzene concentration>10ppm or a total BTEX concentration >50ppm will be excavated and placed immediately adjacent to the excavation. The side walls and bottom of the excavation will be field tested for TPH and BTEX concentrations in accordance with WEQP-06 and WEQP-19.

5.2The Hobbs branch of the OCD will be notified to witness the final confirmation sampling of the side walls and bottom of the excavation. Samples will be collected in accordance with WEQP-77 and analyzed for TPH and BTEX.

5.3 The excavated soils will either be mixed and blended with sub-strait materials to achieve the above stated concentrations or sent to a licensed disposal facility.

6.0 Closure Report

6.1 At the conclusion of the project, Whole Earth shall prepare a closure report which contains the following minimum information:

- Photographs of the location prior to remediation
- Photographs of the location at time of final closure
- Plat map showing sampling locations
- All pre-closure contaminant concentrations
- Contaminant concentrations at the conclusion of the project
- Copies of this protocol and all testing procedures
- Copies of each days tailgate safety meeting
- Copies of daily calibration logs for each instrument
- Independent split sample laboratory analyses
- Shipping manifests for all materials taken to disposal
- Gate receipts from the disposal facility

Procedures

This section contains copies of the detailed sample collection and field testing procedures used on this project.

QP-06 Rev. C

WHOLE EARTH ENVIRONMENTAL
QUALITY PROCEDURE

Procedure for Conducting Field TPH Analysis

Completed By:	Approved By:	Effective Date: 02/15/97

1.0 Purpose

To define the procedure to be used in conducting total percentage hydrocarbon testing in accordance with EPA Method 418.1 (modified) using the "MEGA" TPH Analyzer.

2.0 Scope

This procedure is to be used for field testing and on site remediation information.

3.0 Procedure

3.1 The G.A.C. "MEGA" TPH analyzer is an instrument that measures concentrations of aliphatic hydrocarbons by means of infra-red spectrometry. It is manufactured to our specifications and can accurately measure concentrations from two parts per million through 100,000 parts per million. The unit is factory calibrated however minor calibration adjustments may be made in the field. Quality Procedure 25 defines the field calibration methods to be employed.

3.2 Prior to taking the machine into the field, insert a 500 ppm and 5,000 ppm calibration standard into the sample port of the machine. Zero out the Range dial until the instrument records the exact standard reading.

3.3 Once in the field, insert a large and small cuvette filled with clean Freon 113 into the sample port of the machine. Use the range dial to zero in the reading. If the machine does not zero, do not attempt to adjust the span dial. Immediately implement Quality Procedure 25 .

3.4 Place a 100 g. weight standard on the field scale to insure accuracy. Zero out the scale as necessary.

3.5 Tare a clean 100 ml. sample vial with the Teflon cap removed. Add 10 g. (+/- .01 g), of sample soil into the vial taking care to remove rocks or vegetable matter from the sample to be tested. If the sample is wet, add up to 5 g. silica gel or anhydrous sodium sulfate to the sample after weighing.

3.6 Dispense 10 ml. Freon 113 into the sample vial.

3.7 Cap the vial and shake for five minutes.

3.8 Carefully decant the liquid contents of the vial into a filter/desiccant cartridge and affix the cartridge cap. Recap the sample vial and set aside.

3.9 Insert the metal tip of the pressure syringe into the cap opening and slowly pressurize. **WARNING: APPLY ONLY ENOUGH PRESSURE ON THE SYRINGE TO EFFECT FLOW THROUGH THE FILTERS. TOO MUCH PRESSURE MAY CAUSE THE CAP TO SEPARATE FROM THE BODY OF THE CARTRIDGE.** Once flow is established through the cartridge direct the flow into the 5 cm. cuvette until the cuvette is full. Reverse the pressure on the syringe and remove the syringe tip from the cartridge cap. Set the cartridge aside in vertical position.

3.10 The cuvette has two clear and two frosted sides. Hold the cuvette by the frosted sides and carefully insert into the sample port of the machine. Read the right hand digital read-out of the instrument. If the reading is less than 1,000 ppm. the results shall be recorded in the field Soil Analysis Report. If the result is higher than 1,000 ppm, continue with the dilution procedure.

4.0 Dilution Procedure

4.1 When initial readings are greater than 1,000 ppm using the 5 cm. cuvette, pour the contents of the 5 cm. cuvette into a 1 cm. cuvette. Insert the 1. cm cuvette into the metal holder and insert into the test port of the instrument.

4.1 Read the left hand digital read-out of the machine. If the results are less than 10,000 ppm, record the results into the field Soil Analysis Report. If greater than 10,000 ppm, continue the dilution process. **Concentrations >10,000 ppm are to be used for field screen purposes only.**

4.2 Pour the contents of the small cuvette into a graduated glass pipette. Add 10 ml. pure Freon 113 into the pipette. Shake the contents and pour into the 1cm. cuvette. Repeat step 4.2. adding two zeros to the end of the displayed number. If the reported result is greater than 100,000 ppm. the accuracy of further readings through additional dilutions is extremely questionable. **Do not use for reporting purposes.**

4.4 **Pour all sample Freon into the recycling container.**

5.0 Split Samples

5.1 Each tenth test sample shall be a split sample. Decant approximately one half of the extraction solvent through a filter cartridge and insert into the instrument to obtain a concentration reading. Clean and rinse the cuvette and decant the remainder of the fluid to obtain a second concentration reading from the same sample. If the second reading varies by more than 1% from the original, it will be necessary to completely recalibrate the instrument.

QP-19

WHOLE EARTH ENVIRONMENTAL
QUALITY PROCEDURE

Sampling and Testing Protocol
BTEX Speciation in Soil

Completed By: Approved By: Effective Date: / /

1.0 Purpose

This procedure is to be used to determine the concentrations of Benzene, Toluene, Ethyl-Benzene and Xylene (BTEX) in soils.

2.0 Scope

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

3.1.3 The sealed samples shall be allowed to set for a minimum of five minutes at a minimum temperature of 70^0F.

3.1.4 The sealed sample bag should be massaged to break up any clods, and to provide the soil sample with as much exposed surface area as practically possible.

3.2 Sampling Procedure

3.2.1 The instrument to be used in conducting VOC concentration testing shall be a Photovac Ion-chromatograph with BTEX Module. Prior to use the instrument shall be zeroed out in accordance with QP-55.

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 side walls of the bag. If VOC analysis was conducted on the sample prior to BTEX analysis, care should be taken to insure that a sufficient air volume exists in the bag to provide accurate results. **If the available air space within the bag is insufficient to run a full analysis, the sample shall be discarded.**

3.2.3 Set the instrument to retain the highest result reading value. Record the reading onto the Field Analytical Report Form and additionally enter the location code into the instrument data logger.

4.0 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.**

QP-77

WHOLE EARTH ENVIRONMENTAL
QUALITY PROCEDURE

Procedure for Obtaining
Soil Samples for Transportation to a Laboratory

Completed By: Approved By: Effective Date: / /

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 with Teflon lid.

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

5.2 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.

5.3 Place the sample directly on ice for transport to the laboratory.

5.4 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. Client, Project and sample name.
B. Signed copy of the original Chain of Custody Form including data on 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

Laboratory Analytical

This section contains copies of the chain of custody and analytical results of testing for this project.

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

WHOLE EARTH ENVIRONMENTAL
ATTN: MR. MIKE GRIFFIN
19606 SAN GABRIEL
HOUSTON, TEXAS 77084
FAX: 1-281-646-8996

Sample Type: Soil
Sample Condition: Intact/Iced
Project #: P-25
Project Name: P-25
Project Location: Hobbs, NM

Sampling Date: 01/12/00
Receiving Date: 01/13/00
Analysis Date: 01/13/00

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg
22743	15 S	11	44
22744	15 N	<10	10
22745	15 B	45	244
22746	15 E	<10	22
22747	28 B	<10	70
22748	28 S	<10	<10
22749	28 N	<10	<10
22750	28 W	<10	<10
22751	P N	<10	84
22752	P B	<10	<10
22753	P S	<10	<10
	% IA	86	86
	%EA	96	85
	BLANK	<10	<10

Methods: EPA SW 846-8015M GRO/DRO

Raland K. Tuttle

1-13-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

WHOLE EARTH ENVIRONMENTAL
ATTN: MR. MIKE GRIFFIN
19606 SAN GABRIEL
HOUSTON, TEXAS 77084
FAX: 1-281-646-8996

SampleType: Soil
Sample Condition: Intact/ Iced
Project #: P-25
Project Name: None Given
Project Location: Hobbs, N.M.

Sampling Date: 01/12/00
Receiving Date: 01/13/00
Analysis Date: 01/13/00

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
22743	15 S	<0.100	<0.100	<0.100	0.283	0.104
22744	15 N	<0.100	<0.100	<0.100	<0.100	<0.100
22745	15 B	<0.100	<0.100	0.122	0.533	0.186
22746	15 E	<0.100	<0.100	<0.100	0.186	<0.100
22747	28 B	<0.100	<0.100	<0.100	0.194	<0.100
22748	28 S	<0.100	<0.100	<0.100	<0.100	<0.100
22749	28 N	<0.100	<0.100	<0.100	<0.100	<0.100
22750	28 W	<0.100	<0.100	<0.100	<0.100	<0.100
22751	PN	<0.100	<0.100	<0.100	<0.100	<0.100
22752	PB	<0.100	0.102	0.102	0.226	0.101
22753	PS	<0.100	<0.100	<0.100	<0.100	<0.100
	% IA	94	90	88	90	88
	% EA	102	98	96	98	96
	BLANK	<0.100	<0.100	<0.100	<0.100	<0.100

METHODS: SW 846-8021B,5030

Raland K. Tuttle

1-17-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

WHOLE EARTH ENVIRONMENTAL
ATTN: MR. MIKE GRIFFIN
19606 SAN GABRIEL
HOUSTON, TEXAS 77084
FAX: 1-281-646-8996

Sample Type: Soil
Sample Condition: Intact/Iced
Project #: P-25
Project Name: None Given
Project Location: Hobbs, N.M.

Sampling Date: 01/12/00
Receiving Date: 01/13/00
Analysis Date: 01/14/00

ELT#	FIELD CODE	Chloride mg/kg
22745	15 B	71
22747	28 B	80
22752	PB	27

QUALITY CONTROL	5052
TRUE VALUE	5000
% PRECISION	101
BLANK	<10

Methods: EPA SW 846-8052

Raland K Tuttle

1-17-00
Date

Environmental Lab of Texas, Inc.

12600 West I-20 East Odessa, Texas 79763
(915) 563-1800 FAX (915) 563-1713

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: M. Gillis
Phone #: (800) 554-4358
FAX #: (281) 646-8996
Company Name & Address: 19606 San Gabriel Houston Tx. 77084
Project #: P-25
Project Name:
Project Location: Hobbs, NM
Sampler Signature: M Gillis

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	OTHER	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	OTHER	SAMPLING: DATE	TIME	ANALYSIS REQUEST: BTEX 8021b/5030	TPH 418.1 DRO/GRO	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	TDS	RCI	Cl. barrels
22743	15 S	1									✓			1-12-0	2:00	✓	✓							
22744	15 N	1									✓					✓	✓							
22745	15 G	1									✓					✓	✓							✓
22746	15 E	1									✓					✓	✓							
22747	28 B	1									✓					✓	✓							✓
22748	28 S	1									✓					✓	✓							
22749	28 N	1									✓					✓	✓							
22750	28 W	1									✓					✓	✓							
22751	P N	1									✓					✓	✓							
22752	P B	1									✓					✓	✓							✓
22753	P S	1									✓			✓	✓	✓	✓							

Relinquished by:	Date:	Time:	Received by:
M. Gillis	1-13-99	0950	Rebecca Horne
Relinquished by:	Date:	Time:	Received by:
Relinquished by:	Date:	Time:	Received by Laboratory:

REMARKS:

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

WHOLE EARTH ENVIRONMENTAL
ATTN: MR. MIKE GRIFFIN
19606 SAN GABRIEL
HOUSTON, TEXAS 77084
FAX: 1-281-648-8996

Sample Type: Soil
Sample Condition: Intact/Iced
Project #: P-25
Project Name: None Given
Project Location: Hobbs

Sampling Date: 01/14/00
Receiving Date: 01/16/00
Analysis Date: 01/19/00

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg
22856	15 B-2	<10	71
	% IA	96	83
	%EA	102	MI
	BLANK	<10	<10

MI = matrix interference

Methods: EPA SW 846-8015M GRO/DRO

Raland K Tuttle

1-20-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

WHOLE EARTH ENVIRONMENTAL
ATTN: MR. MIKE GRIFFIN
19606 SAN GABRIEL
HOUSTON, TEXAS 77084
FAX: 1-281-646-8996

SampleType: Soil
Sample Condition: Intact/ Iced
Project #: P-25
Project Name: None Given
Project Location: Hobbs

Sampling Date: 01/14/00
Receiving Date: 01/16/00
Analysis Date: 01/18 & 01/19/00

ELT#	FIELD CODE/ DATE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
22858	15 B-2	<0.100	0.102	<0.100	<0.100	<0.100
	% IA	94	91	89	91	88
	% EA	94	89	87	88	87
	BLANK	<0.100	<0.100	<0.100	<0.100	<0.100

METHODS: SW 846-8021B,5030

Roland K. Tuttle

Roland K. Tuttle

1-20-00

Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

WHOLE EARTH ENVIRONMENTAL
ATTN: MR. MIKE GRIFFIN
19606 SAN GABRIEL
HOUSTON, TEXAS 77084
FAX: 1-281-646-8996

Sample Type: Soil
Sample Condition: Intact/Iced
Project #: P-25
Project Name: None Given
Project Location: Hobbs

Sampling Date: 01/14/00
Receiving Date: 01/16/00
Analysis Date: 01/19/00

ELT#	FIELD CODE	Chloride mg/kg
22856	15 B-2	44

QUALITY CONTROL	5140
TRUE VALUE	5000
% PRECISION	103
BLANK	<10

Methods: EPA SW 846-9052

Roland K Tuttle

1-20-00

Roland K Tuttle — Date

P.01

Environmental Lab of Texas, Inc.

12600 West I-20 East Odessa, Texas 79763
(915) 563-1800 FAX (915) 563-1713

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: M. Griffin

Phone #: (800) 854-4338
FAX #: (281) 646-8996

Company Name & Address: Whole Earth Environ.

Project #: P: 25

Project Name:

Project Location: Hobbs

Sampler Signature:

ANALYSIS REQUEST

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	OTHER	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	OTHER	SAMPLING: DATE	TIME	BTEX 8021B/5030	TPH 418.1 DRO-GRO	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	TDS	RCI	Chlorides
22856	15 B-2	1	4oz	✓							✓			1-14-0	10:20	✓	✓							✓

Relinquished by:	Date:	Time:	Received by:
M. Griffin	1-15-00		
	1-16-00	1600	
			Received by Laboratory:

REMARKS

Manifests

This section contains copies of the shipping and disposal manifests for all materials removed from the project site.

Contaminated Soils Shipment Manifest

1. Manifest Document No. 12167

2. Page ___ of ___

GENERATOR

3. Generator's Name and Mailing Address: Rice Oper.

4. Generator Phone No.:

5. Generator Contact: Caroline Haynes

6. Transporter 1 Company Name: Gandy Corp.

7. ID No.: SCC142255

8. Transporter 2 Company Name:

9. ID No.:

10. Designated Disposal Facility Name and Site Address:
~~Gandy Marley, Inc. Contaminated Soils Landfarm~~
~~7200 East Second Street~~
~~PO Box 1658~~
~~Roswell, NM 88201~~
J & L Landfarm

11. Facility Permit Number: NM-01-0023

12. Facility Phone No.: (505) 398 - 4960

13. Description of Waste	14. Containers No.	14. Containers Type	15. Total Quantity	15. Unit Wt/Vol
a. Oil Soaked Soil from P-25		DT	2425	yards
b.				
c.				

17. Special Handling Instructions and Additional Information: N/A

18. Generator's Certification: *I hereby declare that the contents of the consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable federal, state, and international laws.*

FURTHER, I represent and warrant that the waste material as described on this manifest is either exempt from the Resource Conservation and Recovery Act of 1976, OR has been characterized as non-hazardous material by virtue of appropriate laboratory analysis done in accordance with EPA-approved testing methods

Printed/Typed Name	Signature	Date
M. Griffin	M. Griffin	

TRANSPORTER

19. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date
Larry Gandy	Larry Gandy	

20. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date

21. Discrepancy Information: See m. Roberts

3/2

22. Facility Owner or Operator Certification of receipt of materials described on this manifest except as noted in item 21.

Printed/Typed Name	Signature	Date

J & L LANDFARM, INC.
P.O. BOX 356
HOBBS, NEW MEXICO 88241-0356
PHONE (505) 393-9697 • PERMIT # NM-01-0023

0332

Generator/Company Rice Operating Co.

Authorized Representative C. Haynes

Originating Site P-25

Transporter Gandy Corp.

Authorized Representative [signature]

Brief Description of Material Exempt-Non-Hazardous soil

Estimated Volume 380 yards

TPH

BE-TEX See test

CERTIFICATE OF CHEMICAL ANALYSIS (If required) Waste status Cert.

[signature]
FACILITY AUTHORIZED REPRESENTATIVE

1-10-00
DATE

B-3166

J & L LANDFARM, INC.
P.O. BOX 356
HOBBS, NEW MEXICO 88241-0356
PHONE (505) 393-9697 • PERMIT # NM-01-0023

0135

Generator/Company Rice Operating Co.

Authorized Representative C. Haynes

Originating Site P-25

Transporter Gandy Corp.

Authorized Representative [signature]

Brief Description of Material EXEMPT-NON-HAZARDOUS soil

Estimated Volume 290 yards

TPH See test

BE-TEX

CERTIFICATE OF CHEMICAL ANALYSIS (If required) Waste status Cert.

Joe M. Roberts
FACILITY AUTHORIZED REPRESENTATIVE

1-7-00
DATE

B-3166

J & L LANDFARM, INC.
P.O. BOX 356
HOBBS, NEW MEXICO 88241-0356
PHONE (505) 393-9697 • PERMIT # NM-01-0023

0334

Generator/Company Kiva Operating Co.

Authorized Representative C Haynes

Originating Site P-25

Transporter Gandy Corp.

Authorized Representative [signature]

Brief Description of Material Exempt - contaminated soil

Estimated Volume 244 yards

TPH [illegible]

BE-TEX See Test

CERTIFICATE OF CHEMICAL ANALYSIS (if required) see Attached

[signature]
FACILITY AUTHORIZED REPRESENTATIVE

1-11-00
DATE

J & L LANDFARM, INC.
P.O. BOX 356
HOBBS, NEW MEXICO 88241-0356
PHONE (505) 393-9697 • PERMIT # NM-01-0023

0333

Generator/Company Kiva Operating Co.

Authorized Representative C Haynes

Originating Site P-25

Transporter Gandy Corp.

Authorized Representative [signature]

Brief Description of Material exempt - contaminated soil

Estimated Volume 966 yards
966

TPH [illegible]

BE-TEX See Test

CERTIFICATE OF CHEMICAL ANALYSIS (if required) see attachment.

[signature]
FACILITY AUTHORIZED REPRESENTATIVE

1-11-00
DATE

J & L LANDFARM, INC.
P.O. BOX 356
HOBBS, NEW MEXICO 88241-0356
PHONE (505) 393-9697 • PERMIT # NM-01-0023

0135

Generator/Company [illegible]

Authorized Representative [illegible]

Originating Site [illegible]

Transporter [illegible]

Authorized Representative [illegible]

Brief Description of Material [illegible]

Estimated Volume [illegible]
545

TPH [illegible]

BE-TEX

CERTIFICATE OF CHEMICAL ANALYSIS (if required) [illegible]

[illegible]
FACILITY AUTHORIZED REPRESENTATIVE

1-6-00
DATE