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GENERAL CORRESPONDENCE

YEAR(S): 2004

ARCADIS

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Wayne Price
New Mexico Oil Conservation Division
1220 So. Saint Francis Drive
Santa Fe, New Mexico 87505
Sent Certified Mail

Subject:
Investigation Workplan
Rice Operating Company Blinebry-Drinkard M-14 Junction Box Site
T21S, R37E, Section 14, Unit M Eunice, Lea County, New Mexico

Date:
1 April 2004

Contact:
Sharon Hall

Phone:
432 687-5400

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shall@arcadis-us.com

Dear Mr. Price,

On behalf of Rice Operating Company (ROC), ARCADIS G&M respectfully submits this investigation workplan for the above-referenced site. A Junction Box Disclosure report was completed for this site on July 29, 2003 and submitted to the New Mexico Oil Conservation Division (NMOCD) per the ROC Junction Box Upgrade Workplan.

Site History and Background

The junction box was removed from the subject site. Following removal of the junction box, soil was excavated from the site. Per request of the landowner, the excavated soil was disposed at a permitted facility. The excavation measured 30 feet long by 30 feet wide and 12 feet deep.

Soil from the sidewalls and bottom of the excavation was sampled and analyzed for benzene, toluene, ethlybenzene, xylenes, (BTEX) GRO, DRO and chlorides. Additionally, soil samples were field tested for chlorides. Laboratory and field analytical results are shown in Tables 1 and 2. The sidewall sample consisted of a 4-point composite sample, and the bottom sample consisted of a 5-point composite sample.

Based on the results of the soil sampling analytical results, elevated chloride and total petroleum hydrocarbon (TPH) concentrations are present at the subject site. The excavation was backfilled with clean fill provided by the landowner and the site was graded and seeded with native vegetation.

Proposed Investigation Workplan

A one-half mile water well inventory will be performed. The water well inventory will include a review of water well records listed on the New Mexico State Engineer Office and United States Geological Survey (USGS) websites and windmills indicated on applicable USGS topographic maps. A downgradient water well is reported to exist near the site, as are monitoring wells owned by Dynegy.

Depth to groundwater at the site is expected to be 49 feet below ground surface. One soil boring will be installed at the subject site at the former junction box location. Soil samples will be collected at regular intervals no greater than five feet, screened in the field using a photo ionization detector (PID) and field tested for chlorides. Soil lithology and the presence of any observed staining or odor will be recorded. One sample, the sample collected at total depth of the boring will be submitted to a laboratory for laboratory analysis as confirmation of the field sampling.

If impacts to soil are identified in soil samples collected from the interval at which groundwater is encountered, the soil boring will be converted to a monitoring well. The monitor well will be constructed, developed and sampled in accordance with Environmental Protection Agency and NMOCD standards. A groundwater sample will be collected and submitted for laboratory analysis for chlorides, BTEX and general chemistry.

If analytical results indicate that chloride and/or BTEX concentrations exceed New Mexico Water Quality Control Commission standards, additional monitoring wells may be installed as warranted by the results of the investigation. However, if existing monitoring and water wells are present near the site, the well construction is determined to be sufficient for representative sampling, and access to the wells can be obtained, ROC will include the wells in their sampling program and sample the existing wells in lieu of installing additional monitoring wells.

A report that details the investigation activities and results will be submitted to the OCD. The report will include recommendations for further action if necessary or for closure of the site.

Very Truly Yours,

ARCADIS G&M, Inc.

Sharon E. Hall

Sharon E. Hall
Site Evaluation Department Manager

Copies:
Carolyn Haynes- Rice Operating Company

Attachment:

Tables 1 and 2

TABLE 1

M-14

LABORATORY ANALYTICAL RESULTS

Sample Location	Benzene mg/kg	Toluene mg/kg	Ethylbenzene mg/kg	Total Xylenes mg/kg	GRO mg/kg	DRO mg/kg	Chlorides mg/kg
SIDEWALLS	<0.025	<0.025	<0.025	0.031	16.2	621	5810
BOTTOM	<0.025	<0.025	<0.025	<0.025	<10.0	40	7020

TABLE 2

FIELD TESTS

CHLORIDE

Location	Depth (ft)	ppm
Vertical	2	400
	4	440
	6	1800
	8	3400
	10	4400
	12	4200

TPH

4 wall comp.	n/a	4200
bottom comp.	12	4400