1R - 428-60

## REPORTS

# DATE:

9-2-11

### RECEIVED OCD

#### L. Peter Galusky, Jr. Ph.D., P.G. Texerra

627 Forest View Way Monument, Colorado 80132 Tel: 719-339-6791 E-mail: lpg@texerra.com

p b: 50

September 2<sup>nd</sup>, 2011

Mr. Edward Hansen New Mexico Energy, Minerals, & Natural Resources Oil Conservation Division, Environmental Bureau 1220 S. St. Francis Drive Santa Fe, New Mexico 87505

#### Re: Corrective Action Plan Report and Termination Request Rice Operating Company – Hobbs SWD System Hobbs Jct A-25. T-18-S, R-37-E, Sec 25, UL A NMOCD Case Number 1R428-60

Sent via E-mail and U.S. Mail Certified Return Receipt No. 7008 1830 0004 2694 4309

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Mr. Hansen:

Rice Operating Company (ROC) has completed the additional soil boring and analyses that you requested in your e-mail letter of June 21<sup>st</sup>, 2010 approving of the Corrective Action Plan (CAP) for this project. Please find attached a Corrective Action Plan Report and Termination Request.

ROC is the service provider (agent) for the Hobbs SWD System and has no ownership of any portion of the pipeline, well, or facility. The System is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis.

Thank you for your consideration.

Sincerely

L. Peter Galusky, Jr. Ph.D., P.G.

Attachment: Corrective Action Plan Report and Termination Request

Copy: Rice Operating Company

Corrective Action Plan Report and Termination Request Rice Operating Company Hobbs SWD Jct A-25 NMOCD Case Number 1R428-60

#### **Background and Project History**

The Hobbs Junction A-25 site is located northwest of the city of Hobbs at T-18-S, R-37-E, Section 25, Unit A, east of the corner of a large former tank battery site (Figure 1). The junction box was part of the Hobbs SWD system operated by Rice Operating Company (ROC). The Hobbs SWD system is no longer in service. The junction box was removed on October 18, 2002 and soil samples recovered from the resulting 4-foot deep excavation indicated a maximum chloride concentration of 188 mg/kg and "light" TPH levels.

An Investigation Characterization Plan (ICP), dated February 19<sup>th</sup>, 2009, was approved by the NMOCD on April 22<sup>nd</sup>, 2009 with fieldwork undertaken in September of 2009. An Initial Characterization Report (ICR) and Corrective Action Plan (CAP) was submitted to NMOCD by RT Hicks Consultants on June 8<sup>th</sup>, 2010. The ICR indicated that the site posed essentially no risk of groundwater contamination and recommended that the surface be restored through the removal of large rocks and asphaltic soils, backfilling with clean topsoil and seeding to native vegetation. NMOCD approved the CAP on June 21<sup>st</sup>, 2010 with the stipulation for an additional soil boring and analyses of petroleum hydrocarbons (Appendix A). This additional work was completed by ROC in June of 2011 by installing SB-2 approximately 3 ft southeast of SB-1. A collective summary of soil sampling and analyses is presented in the following discussions.

#### **Results of Soil Sampling and Analyses**

The locations of two soil borings, SB-1 & SB-2, taken at the subject site are given in Figure 2 along with a brief summary of field and laboratory results. Lithology logs and analytical results are given in Figures 3 and 4 and laboratory reports are given in Appendices B1 & B2 for SB-1 and SB-2, respectively.

Chlorides were found to be less than 250 mg/kg throughout the depth (35 ft bgs) of SB-1 and were therefore ruled out as a chemical of concern. However, significant residual hydrocarbons as diesel-range organics (DRO) were found at 15 ft bgs, measuring 2,330 mg/kg in a sample sent to Cardinal Laboratories. This was associated with a field PID reading of 166 ppm and a strong hydrocarbon odor and low, but detectable BTEX concentrations (total BTEX was 4.1 mg/kg with benzene being below laboratory detection limits). Gasoline-range organics (GRO) were below laboratory detection limits in the same sample. DRO declined to 116 mg/kg in a soil sample taken at 35 ft bgs where GRO was also below detection limits. Field PID readings declined to 21.8 ppm at 35 ft bgs.

Field PID readings at SB-2 were 1,148 ppm at 15 ft bgs, declining to 1,029 mg/kg at 17 ft bgs and 918 ppm at 19 ft bgs. Laboratory-measured DRO similarly dropped from 5,010 mg/kg at 15 ft bgs, to 3,760 mg/kg at 17 ft bgs and 2,120 mg/kg at 19 ft bgs. GRO was 151 mg/kg at 15 ft bgs but below detection at the other two depths. Laboratory-measured benzene was below detection in all three samples. Total BTEX was 8.71 mg/kg at 15 ft bgs, 7.9 mg/kg at 17 ft bgs and 3.8 mg/kg at 19 ft bgs.

These data are indicative of residual asphaltic petroleum hydrocarbons that are essentially immobile and are naturally attenuating in place. The absence of detectable benzene, the low levels of total BTEX, the low to non-detectable levels of GRO, and the fact that groundwater occurs at an estimated depth of 48 ft bgs indicates that these residual hydrocarbons pose no significant threat to groundwater quality.

#### Summary of Surface Restoration

In December of 2009, approximately nine cubic yards of asphaltine and oil contaminated soils were removed and disposed at Sundance Services. Approximately 40 tons of clean blow sand was backfilled into the excavation. The upper soil material was leveled to natural ground contours and blended with organic compost and seeded to natural vegetation. Silt net fencing was installed in July 2010. Photographs of this work are given in Figure 5 and the revegetation for is given in Figure 6.

#### **Conclusions and Recommendation**

The Hobbs Jct A-25 location was found to have significant residual hydrocarbons at 15 ft bgs. However, these were heavy, DRO asphaltic compounds with negligible benzene, low total BTEX and low GRO. Moreover, the laboratory-measured concentrations of all hydrocarbons decreased steadily from 15 ft to 19 ft bgs. Given that the solubility of these residual hydrocarbons is low and that groundwater is approximately 30+ ft below these depths it is unlikely that these pose a significant threat to groundwater quality. Rather, the residual soil hydrocarbons will likely continue to attenuate in-place due to natural, microbially-mediated bio-remediation.

As there is negligible residual sodicity in these soils (as measured by low residual chloride levels) the restoration of near-surface soils will ultimately support natural revegetation and the development of a natural evaporative barrier to groundwater infiltration.

The restorative actions undertaken by ROC together with the absence of significant soil chlorides and the limited presence of residual asphaltic hydrocarbons ensure that groundwater and future surface ecological conditions will be unaffected by the present condition of this closed facility. We therefore recommend, and respectfully request from NMOCD, remediation termination or similar regulatory closure status.

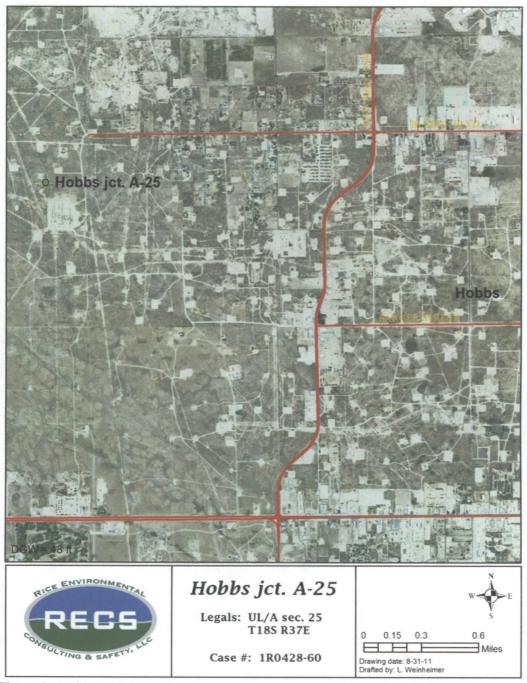


Figure 1 – Hobbs Jct A-25 site location.

Hobbs Jct A-25 Corrective Action Plan Report & Termination Request

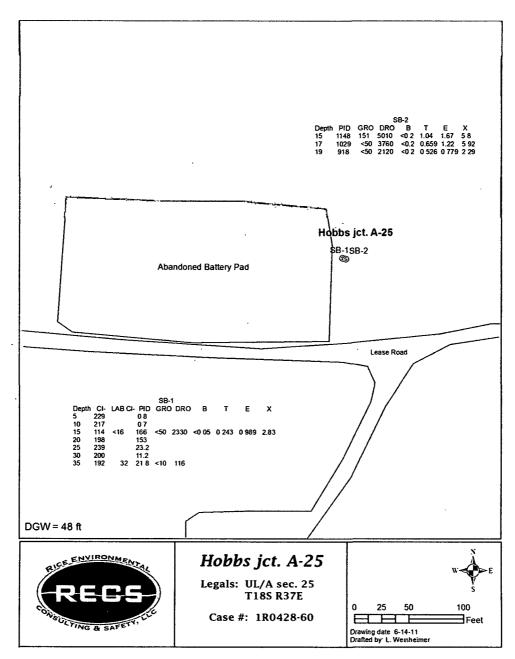


Figure 2 – Location of soil bores and summaries of field and laboratory analytical results.

	Logger: Driller: Consultant: ing Method: Start Date:			Dale Littlejohn rison & Cooper, Inc. Drilling R.T. Hicks, Consultants Air rotary 9/23/2009		
	End Date:			9/23/2009	Project Name:	Well ID:
Comm	air ro	DRAFTER	tings (s	g at 10 ft. All other were from foll was rocky) ra Weinheimer, ROC GW = 48 ft	Hobbs jct. A Location: UI Lat: N32°43'20.0 Long: W103°12	L/A sec. 25 T18S R378 023" County: Lea
Depth (feet)	chloride field tests	LAB	PID	Description	Lithology	Well Construction
Sara and a star				0 - 5 ft		II Ih
				SILT		
5	229		0.8	dark brown, possible fill		
		1		5 - 10 ft		
				SILT WITH CALICHE		
				grayish-brown, hydrocarbon odor	_	
10	217		0.7			
				10 - 15 ft		
				SILT, VERY FINE SAND, CALICHE		
15	114	CI- <16	166	gray, strong hydrocarbon odor		
	B <0.05 T 0.243	GRO <50				
	E 0.989	DRO		15 - 25 ft		bentonite
	X 2.83	2330		SILT AND VERY FINE SAND		
20	198		153			seal
				grayish-brown, mod. hydrocarbon odor		
25	239		23.2			
				25 - 30 ft		
				SILT AND SILTY SAND WITH CALICHE		
30	200		11.2	grayish-brown, mod. hydrocarbon odor		
				30 - 35 ft	•	
				VERY FINE SAND, SMALL GRAVEL	0 0	
35	192	CI- 32	21.8	brown, poorly sorted, angular		
		GRO <10		slight hydrocarbon odor		
		DRO 116				

Figure 3 - Soil Bore # 1 lithology and results of field chloride and PID measurements and lab analyses of chloride and petroleum hydrocarbons.

SB-2 SB-2 SB-2 SB-2 SB-2 SB-2 SB-2 SB-2	Project Name: Hobbs jct. A-2 Project Consultan Lettention Lifeston Lettention Lifeston Lettention Lifeston Lettention Lifeston Lifeston	nt: R.J., Hicks. R. M. T188 Marks M. Hounday Loca
ecquerauture securge. Al L.Shinbelaur CAP-= 48%	Leideland Likesen Leiden vierseinen Long: 188-120-42	r. NY TIRA BERE Ny Kalondry Leon 1974 – State-Tam
Description	Lithology	Well Construction
		wenconstruction
3 Grey fine sand with some small caliche		bentonite
Ð		seal
-		
18	(did not field test for chlorides) 18	

**Figure 4** – Soil Bore # 2 lithology and results of field PID measurements and lab analyses of petroleum hydrocarbons.

Figure 5 – Surface Restoration Photos



Adding organic compost to the backfilled site



Seeding the backfilled site



Chaining the seed into the soil



Site complete with silt net fencing

Hobbs Jct A-25 Corrective Action Plan Report & Termination Request

New Mexico State Land Off	ice	OHER OF PUS
Field Operations Division		ALAN S
	NM 87504 M 88240	
	. NM 88220	
(575) 623-4979 1001 S. Atkinson Roswell,	NM 88210	
(575) 763-0796 105 E. 6 <sup>th</sup> St. Clovis, N	IM 88101	WMEXICO
	TATION F	ORM
I. General Information     Site name: Hobbs jct. A-25		
U/L or Qtr/Qtr Section Township Range	Lease No.: County	Latitude Longitude
A 25 18S 37E	Lea	32*43.326'N 103*11.989' W
Company Name: Rice Operating Company	Contact Nam	
Phone no.: 575-393-9174 Email:	hconder@ric	eswd.com
Address: 122 W. Taylor, Hobbs, NM		
Spill / Release 🗌 🛛 P&A Well 🗌	Pit Closure	Facility Closure
OCD Spill No. API No.		Type: Hobbs Abandonment Plan
Site size: acres 2500	square feet	Map detail of site attached
Additional information:		· · · · · · · · · · · · · · · · · · ·
3. Soils *Do not rep caliche subsoils; caliche ro	cks brought to the sur	face by ripping shall be remayed
		ded Depth (in):
Texture: Describe soil & subsoil:	Sandy loam	
Soil prep methods: Rip Depth(in):	Disc Depth	(in): 6in Rollerpack
Date completed: 12/9/2009 Photos attache	ed 🔲 🛛 🗋 N	lumber of photos:
4. Seeding *Attach seed bag tags to this form. Seed		
Custom seed mix  Prescribed mix  Seed mix Is seed mix divided into submixes based on seed size?	Yes No	ty Mix/ Rye   Seeding date. 12 / 9 /09
Drill Seeder	Broadcast X	Hydroseeding
Drill Type:	Method: Hand b	
Soil conditions during seeding: Dry 🕅 Damp	Wet	
Photos attached 🛛 Observations:		
Number of photos: 2   1 lb Lea County Mix; 2 lbs	of Elbon Rye	
5. Additional Methods		
Mulching Crimping	Fertilizer	Other 🔀
Mulch type:	Type:	Describe: Organic compost
Tons/acre:	Lbs/acre:	
Photos attached 🔀 ' Observations:		
Number of photos: 1 Nature's Way Organic	Compost	
5. Certification I hereby certify that the information in this f	home and attachments is to	and manufacture to the basis of much manufacture and before
Name: Robert Egans		nmental Tech Date: 3/8/10
Signature: Require Mores		
<del>ر</del> .		
		Version 20080925

Figure 6 – Revegetation Form

#### APPENDICES

- APPENDIX A OCD letter approving CAP and requesting additional soil boring.
- APPENDIX B1 Cardinal Laboratories analyses of Soil Boring #1.
- APPENDIX B2 Cardinal Laboratories analyses of Soil Boring # 2.

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#### APPENDIX A

From: Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us] Sent: Monday, June 21, 2010 4:47 PM To: Hack Conder Cc: Leking, Geoffrey R, EMNRD; Katie Jones; Dale Littlejohn Subject: Corrective Action Plan (1R428-60) Approval - ROC Hobbs SWD Jct A-25 Site

RE: Initial Characterization Report and Corrective Action Plan for the Rice Operating Company's Hobbs SWD Jct A-25 Site Unit Letter A, Section 25, T18S, R37E, NMPM, Lea County, New Mexico Corrective Action Plan (1R428-60) Approval

Dear Mr. Conder:

The New Mexico Oil Conservation Division (OCD) has received the Corrective Action Plan for the Hobbs SWD Jct A-25 Site, dated June 8, 2010, and has conducted a review of the Corrective Action Plan. The Plan indicates that Rice Operating Company (ROC) has substantially met the requirements of 19.15.29 NMAC (Part 29; formerly, Rule 116) for a remediation plan. Therefore, the OCD hereby conditionally approves the Corrective Action Plan as proposed for above-referenced site in accordance with 19.15.29 NMAC.

ROC must obtain soil samples and analyze for DRO at depths of 15', 17' and 19' bgs within 5 feet of SB-1 between 11 and 13 months from today.

ROC must submit to the OCD a report of the corrective actions within 90 days of obtaining the above-referenced soil samples.

Please be advised that OCD approval of this Plan does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have any questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen Hydrologist Environmental Bureau

Hobbs Jct A-25 Corrective Action Plan Report & Termination Request

**Rice Operating Company** 122 West-Taylor Hobbs, NM 88240 Re: Hobbs Jct. A-25 Enclosed are the results of analyses for sample number H18304, received by the laboratory on 09/23/09 at 5:00 pm. Cardinal Laboratories is accredited through Texas NELAP for: Method SW-846 8021. Benzene, Toluene, Ethyl Benzene, and Total Xylenes Mathod SW-846 9260 Bowers, Tohune, Kinyi Beezone, and Total Xi Method TX 1005 Total Petrolson Hydroxybons Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices. Cardinal Laboratories is accredited though the State of Colorado Department of Public Health and Environment for: Method EPA 552.2 Haloacetic Acids (HAA-5) Method EPA 524.2 Total Trihalomethanes (TTHM) Contracting and the second NOR VOESTES. NOT Total Number of Pages of Report: 4 (includes Chain of Custody) Sincerely, Celey D. Keene Laboratory Director This report conforms with NELAP requirements.

APPENDIX B-1 - Laboratory analyses of soil samples from SB-1

Hobbs Jct A-25 Corrective Action Plan Report & Termination Request

÷." ð., 5 24 -4 1. ANALYTICAL RESULTS FOR AIRE OPERATING COMPANY ATTN: HACK SOLDER ATTN: HACK SOLDER ATTN: FAYLON HOLES, HELAND PARATOL (1975) 282-1471 Sampling Date: 09/23/09 Sample Type: SOIL Sample Condition: COOL & INTACT Receiving Date: 09/23/09 Reporting Date: 09/25/09 Project Owner: NOT GIVEN: Project Name: HOBBS JCT. A-25 Sample Received By: ML Project Location: HOBBS JCT. A-25 Analyzed By: AB/HM GRO DRO (C. C.) (Croca) C)\* LAB MASSER SAMPLE ID (110/50) (mightig) (100/20) 09/28/09 ANALYS'S DATE 03/25/00 00/24/58 HIGHLA 39 71 @ 15 <\$0.0 2,820 <10 H10504.2 88 2 6 25 1<10.0 118 32 Quality Control 438 443 490 500 True Value QC 500 500 H Recovery 57.6 88.6 25.0 Relativo Percent Differenco 0.6 1.8 2.0 ECTHODS: TPH GRO & DRO: EPA SW-849 8015 M; CT: Still Methods 4500-CTB Analysis performed on 1:4 wv squeous adroca. Reported on with weight. Not accredited/for GRO/DRO and Chloride. H18304 TCL RICE PLEASE NOTE 1

- 59 2 -3 ą T - **t**ų Ξ. Ž7 à . iste Ξ. PRESENT AND A THE MALAND HOLD 1000 100 BORATORIES ANALYTICAL RESULTS FOR RICE OPERATING COMPANY ATTN: HACK CONDER 122 W. TAYLOR HOSES, NEA 63200 FAX TO: (575) 287-1471 Receiving Date: 09/23/09 Sampling Date: 02/22/09 Reserving Cole Lanzaio Annoning Cole (M22433) Friday States (School States) Press Cole (School States) Press Cole (School States) Surgio Spor-COL 5 際語 ring 6.900 interferit. ETHYL- TOTAL BENZENE TOLUENE BENZENE XYLENES LAB NO. SAMPLE ID (mg/kg) (mg/kg) (mg/kg) (mg/kg) ANALYSIS DATE: 09/24/09 09/24/09 :09/24/09 09/24/09 H18304-1 SB#1 @ 15 <0.050 0.243 0.989 -2.83 Quality Control. 0.050 0.048 0.048 0148 0.050 96.0) 3.9( True Value OC: 0.0501 0:050 0:150 96.0 100 % Recovery 98:7 134 Relative Penzal Different 3.8 2.64 27 METHODS: BTEX - SALAKS 60218 TEVAS RELAP ACCREDITATION TRATOGES OF TX FOR SENZENE, TOLLENE, ETHYL BENZENE, AND TOTAL XYLENES. Reported on wet weight. Lab Director HI8304 B.RICE

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	<b>RDINAL</b> boratories	
La	boratories	PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240
June 14, 2011	•	
Hack Conder		
Rice Operating Company	/	
112 W. Taylor		
Hobbs, NM 88240		
RE: HOBBS JCT A-25		
Enclosed are the results	of analyses for samples received by the laborato	nry on 06/07/11 16:12.
Cardinal Laboratories is	accredited through Texas NELAP for:	
Method 5W-846 8021	Benzene, Toluene, Ethyl Benzene, and Total Xyl	
Method 5W-846 8260 Method TX 1005	Benzene, Toluene, Ethyl Benzene, and Total Xyl Total Petroleum Hydorcarbons	lenes
Certificate number T104 water matrices.	704398-08-TX. Accreditation applies to solid and	chemical materials and non-potable
Cardinal Laboratories is	accreditated through the State of Colorado Depar	tment of Public Health and Environment for:
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Method EPA 524.2 Method EPA 524.4	Total Trihalomethanes (TTHM) Regulated VOCs (V2, V3)	
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Hobbs Jct A-25 Corrective Action Plan Report & Termination Request

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	<b>CARDINAL</b> Laboratories	PHONE (575) 393-2326 * 101 E. MARLAND * HOBBS, NN 88240
	Notes and D	efinitions
Z-01	One or more surrogates above historical fimits.	
ND	Analyte NOT DETECTED at or above the rejucting famil	
RPD	Relative Percent Difference	
14	Samples not received at proper temperature of 6°C or below	
***	Insufficient time to reach temperature.	
-	Chloride by SAM500CI-B does not require samples be received at or bein Samples reported on an as received basis (wet) unless otherwise nate	
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Hobbs Jct A-25 Corrective Action Plan Report & Termination Request

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Hobbs Jct A-25 Corrective Action Plan Report & Termination Request

	ARDINAL boratories	
La	Doratories	PHONE (575) 393-2325 * 101 E. MARLAND * HOBBS, NM 88240
June 09, 2011		
Hank Conder		
Hack Conder Rice Operating Compan		
112 W. Taylor	Ŧ	
Hobbs, NM 88240		
re <sup>.</sup> Hobbs JCT A-25		
Enclosed are the results	of analyses for samples received by the labora	tory on 06/07/11 16:12.
Cardinal Laboratories is	accredited through Texas NELAP for:	
Mclhod SW-846 8021	Benzene, Toluene, Ethyl Benzene, and Total X	
Method SW-846 8260 Method TX 1005	Benzene, Toluene, Ethyl Benzene, and Total X Total Petroleum Hydorcarbons	ylenes
Certificate number T10 water matrices.	1704398-08-TX Accreditation applies to solid an	d chemical materials and non-potable
Cardinal Laboratories is	accreditated through the State of Colorado Depa	artment of Public Health and Environment for:
Method EPA 552.2	Haloacetic Acids (HAA-5)	
Method EPA 524.2 Method EPA 524.4	Total Trihalomethanes (TTHM) Regulated VOCs (V2, V3)	
Accreditation applies to	, public drinking water matrices.	
	P requirements and is made up of a cover page, u have any questions concerning this report, plea	
Sincerely,		
11	XK	
ceego	D.Keine	
Celey D. Keene		
Lab Director/Quality Ma	nager	

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Hobbs Jct A-25 Corrective Action Plan Report & Termination Request

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				PHO	NE (575) 3	93-2326 * 101	L. PAREAD NO	555, 114 55	240
		Anal	vtical Resul	ts For:					
			e Operating Co	трапу					
			ck Conder						
			2 W Taylor bbs NM, S8240						
				) 397-1471					
Received:	06/07/2	011		Sar	npling Da	ste:	06/07/2	011	
Reported:	06/09/2				npling Ty		Soil		
Project Name:	HOBBS .				npling Co		Cool &		
Project Number: Project Location:	NONE G HOBBS J			Sar	nple Rec	eived By:	Jodi He	nson	
Project Location:	numbs.	CT A-25							
Sample ID: SB 2 @ 15' (H10) ITEX 60218	L <b>178-01</b> ) mg	/kg	Analyze	d By: CNS					
Anréyte	Result	Reporting Limit	Analyzed	Method 3'ank	B5	95 Recivery	True Value QC	RPD	Qualifæ
lenzene*	<0.200	0.200	06/08/2011	ND	2.07	104	2 00	2.80	
'oluene*	1.04	0.200	06/08/2011	ND	2 02	101	2 00	3 31	
thylbenzene*	1.67	0 200	06/08/2011	ND	2.11	106	. 2.00	7 37	
otal Xylenes*	5.80	0.600	06/08/2011	ND	6.14	102	6 00	3 01	
IEA BUZIB	ng		Analyze						
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Analytis	Result	Reporting Lunit	Analyzec	Method Sank	65 2.07	% Recovery	The Vslue QC	RPD	Qualitier
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Anal <i>ju</i> : Benzene* F <b>oluene</b> *	Result <0.200 <b>0.659</b>	Reporting Lumit 8 200 8 200	Analyzec 06/08/2011 06/08/2011	ND ND	2.07 2 02	104 101	2 00 2 00	2 80 3.31	Qualitier
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	orato	ories	5	PHO	NE (575) 3	193-2326 ° 101	E. MARLAND * HO	BBS, NM 88	240
		Anal	ytical Resul	ts For:					
		Ha 11 Ho	e Operating Col ck Conder 2 W. Taytor bbs NM, 88240 < To: (575)	npany 397-1471			,		
Received: Reported Project Name: Project Number: Project Location:	06/07/20 06/09/20 HO885 X NONE GI HO885 X	11 CT A-25 VEN		Sar Sar	mpling Da mpling Ty mpling Co mple Reco	/pe:	06/07/2 Soil Cool & J Jodi He	Intact	
ample ID: SB 2 @ 19' (H) TEX 80218	1 <b>01178-03)</b> mg/	teg	Analyze	l By: CNS					
Analyte	Result	Reporting Limit	Anatyzed	Nethod Blank	85	% Recovery	True Value QC	RPD	Qualifier
lenzene*	<0.200	0.200	05/08/2011	ND	2.07	101	200.	2 60	
oluene*	0.526	0.200	05/08/2011	ND	2.02	101	2 00	3.31	
thylbenzene*	0.779	0 700	06/08/2011	ND	2.11	105	00.r	2 37	
otal Xylenes*	2.29	0.600	06/08/2011	ND	6 14	102	6.00	3 01	
Cardinal Laboratories						-	fertiu actions At de	ets. Totalite Per	ted Analyte

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	CARDINAL Laboratories	PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240	
	Notes and	Definitions	
NE) RPD:	Analytic NOT DETECTED at or above the reporting limit	·	
**	Samples not received at proper temperature of 6°C or below		
***	Insufficient time to reach temperatura.		
-	Chloride by SM4500CHB does not require samples be received at or ba Samples reported on an as received basis (wel) unless otherwise not		
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Cardinal Lat		. *=Accredited Ana	
PLEXE: 18772- Lat may clear stream of relating, which is clear is beend upon any	الألي هذا المحتوية. الله الاعتام المالية مع مراجعة المعلمية مع معرفين أن عن مراحة محتري موادرية . المتعاصر العالم الحر محترجة معالماً معلمية معالماً المعادية على محترية المحترية المحترية المحترية المحترية الم العام المحترية المحترية المحترية المحترية مع محترية المحترية المحترية المحترية المحترية المحترية المحترية المحت	από έ τι αυτικέ ε λεί θαι έσε πέζε, αι όσε στα πι, από έξει τους, ότι μέγορας – εί αλοιος απολούς έτα στο αυγγ 34) αύτας δαλα τα από κατά τη μαρία αλά το πάλα τη τη στος, αλλά ζατά το διά τη διά δια τη διά δια τη τουργογιά Το πεί παι ανατικής τη είται το ματικό δια τη ανά από της. Οι διά ματική του από τη τη ζηλολη μηγή από τη αλοι προσεκό επο τη διά από το αλοιο άχουσαι οι από από αλοιολογία.	teraya. Tanggu
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Hobbs Jct A-25 Corrective Action Plan Report & Termination Request

#### Hansen, Edward J., EMNRD

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From:Katie Jones [kjones@riceswd.com]Sent:Wednesday, September 07, 2011 3:54 PMTo:Hansen, Edward J., EMNRDCc:Hack Conder; L Peter GaluskySubject:RE: Rice Operating Company - Hobbs SWD Jct A-25 - NMOCD Case No. 1R428-60	28-60
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Mr. Hansen,

A groundwater study resulted in no wells located within a half-mile radius of this site. There is one well listed on the NMOSE website in section 25 with a depth to groundwater of 84 ft below ground surface (bgs). ROC data from monitoring wells and one USGS well located within section 29 average a depth to groundwater of 57 ft bgs. Averaging the ROC data from section 29 with the OSE well data located in section 25 estimates a depth to groundwater of approximately 70 ft bgs. Let me know if you have any questions.

Thank you.

Katie Jones Environmental Project Manager RICE Operating Company

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From: Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us] Sent: Wednesday, September 07, 2011 2:08 PM To: Katie Jones Cc: L Peter Galusky Jr Subject: RE: Rice Operating Company - Hobbs SWD Jct A-25 - NMOCD Case No. 1R428-60
Katie, Can you give me a more recent approximation of the depth to groundwater at this site (based on data you have from other nearby sites). My research indicates that the dtw may be closer to 68' (v. 48' as noted in one of the earlier reports). Thanks, Edward J. Hansen 505-476-3489
From: L Peter Galusky Jr [mailto:lpgalusky@alumni.virginia.edu] Sent: Friday, September 02, 2011 11:17 AM To: Hansen, Edward J., EMNRD Cc: Katie Jones Subject: Rice Operating Company - Hobbs SWD Jct'A-25 - NMOCD Case No. 1R428-60
Edward,
Places find attached (in additional) a Corrective Action Plan Perpert and Termination Persuast for the above

Please find attached (in .pdf format) a Corrective Action Plan Report and Termination Request for the abovereferenced project.

I will follow this with a hard copy in the U.S. mail.

Thank you for your consideration.

#### Sincerely,

Pete G.

--

#### L Peter (Pete) Galusky, Jr. Ph.D. Texerra

Cell: 719-339-6791

Texerra e-mail:lpg@texerra.comTexerra website:www.texerra.com

Personal e-mail: <u>lpgalusky@alumni.virginia.edu</u>