# 1R-425-67

## REPORTS

DATE:

7-11

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

Texerra

791 JUL 11 A 11: 58

- -----

627 Forest View Way Monument, Colorado 80132 Tel: 917-339-6791 E-mail: lpg@texerra.com

July 7<sup>th</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: Project Update

Rice Operating Company – Vacuum SWD System Vacuum F-34 Vent Boot UL F, Sect 34, Township 17S, Range 35E NMOCD Case Number 1R425-67

Sent via E-mail and U.S. Mail Certified Return Receipt No. 7011 0110 0001 5863 4868

Mr. Hansen:

Rice Operating Company (ROC) has completed the installation of a double synthetic subsurface soil liner and surface restoration as the vadose zone protective remedy for the Vacuum F-34 Vent Boot project (location map given in Figure 1), as summarized in the previously submitted (November 26<sup>th</sup>, 2010) Notification of Groundwater Impact and Addendum submitted December 22, 2010. This work, which was completed in April and May of this year, is summarized, below:

- Soils were excavated to 4.5 ft bgs over an area of approximately 75 by 45 ft, encompassing the surface footprint of the affected area. Large rocks were sifted and removed to Sundance Disposal.
- Additional soil material was excavated to a depth of 16 ft bgs from two separate excavations, each
  encompassing an area of approximately 10 by 10 ft and surrounding the soil borings, which
  previously indicated more significant subsurface chloride contamination (SB-2 and SB-4).
- Six inches of clean blow sand (PID = 3.1, lab chlorides < 16 mg/kg) was added as padding to the bottoms of these two, deeper excavations and a 20 mil reinforced liner was installed into each one. The liner was then padded with six inches of clean blow sand and blended backfill (PID = 38.3, lab chlorides 1,650 mg/kg) was backfilled into each 10 by 10 ft excavation to the base of the larger excavation (at 4.5 ft bgs). Six inches of clean blow sand was added as padding over the 75 by 45 ft area.
- A 20 mil reinforced liner was installed over the 75 by 45 ft excavation and six inches of clean blow sand was added as padding above it. Clean, pond-bottom soil (PID = 1.8, lab chlorides = 16 mg/kg) was then backfilled to near the surface and clean blow sand was added and contoured to the original ground surface.
- Silt fencing was installed around the restored area. 850 lbs of bioNhance and 4 bales of peanut hay were added as soil amendment. Following this, the site was seeded with 10 lbs of warm season mix, 7.5 lbs of blue gramma grass and 20 lbs of race horse oats. The soil amendments and seed were incorporated into the soil using a tractor.

A photographic chronology of this work is given in Figure 2. A total of 520 cubic yards of rock and contaminated soil material was hauled to and disposed at Sundance Disposal. A total of 608 cubic yards of blow sand and pond bottom soil was imported and used as liner padding and backfill. Field PID

analysis of hydrocarbons and laboratory analyses of chlorides and the revegetation form are given in the Appendix.

We submit that the installation of the double-liner system and the restoration of the soil surface serve as a remedy to protect groundwater from potential future leaching of residual soil chlorides from the unsaturated zone beneath this location. We will continue to monitor groundwater through the end of this calendar year, subsequently prepare and submit an analysis of historical groundwater impacts and determine if a remedy is warranted for the saturated zone.

ROC is the service provider (agent) for the Vacuum 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.

Please call either myself or Hack Conder of Rice Operating Company if you have any questions or wish to discuss this matter. Thank you for your consideration.

Sincerely,

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

Copy: Rice Operating Company



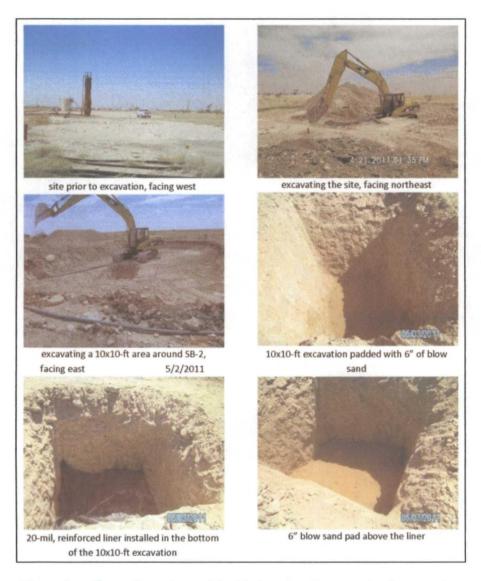


Figure 2a - Photo-chronology of double-liner installation and soil restoration.

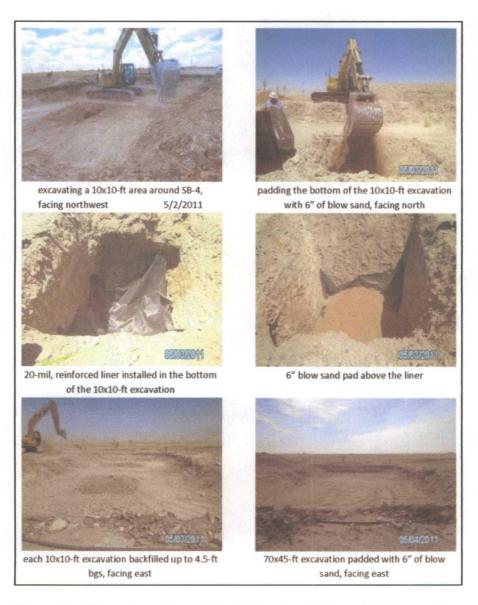


Figure 2b – Photo-chronology of double-liner installation and soil restoration.



Figure 2c - Photo-chronology of double-liner installation and soil restoration.

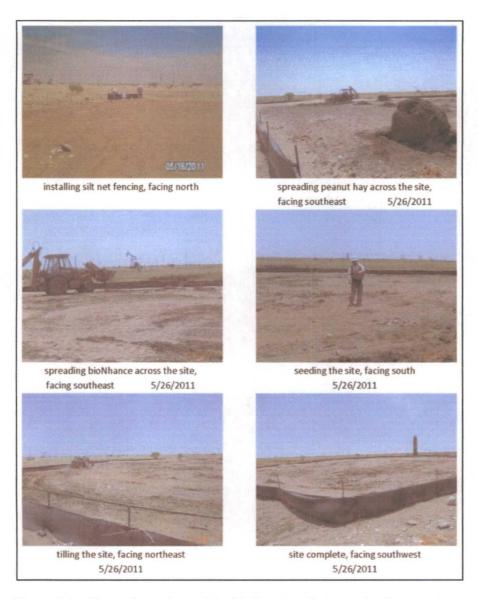


Figure 2d – Photo-chronology of double-liner installation and soil restoration.

### **APPENDIX**

### **Contents**

- Appendix A-1: Blended backfill field PID reading.
- Appendix A-2: Blended backfill laboratory chloride analysis (5 pages).
- Appendix A-3: Imported blow sand field PID reading.
- Appendix A-4: Imported blow sand field laboratory chloride analysis (4 pages).
- Appendix A-5: Imported pond bottom soil field PID reading.
- Appendix A-6: Imported pond bottom soil laboratory chloride analysis (4 pages).
- Appendix A-7: Revegetation form.

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VACUUM F-34	F	34	17	35
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BOCKFILL	38.3			
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			<u> </u>	

Appendix A-1: Blended backfill field PID reading.

Appendix A-2: Blended backfill laboratory chloride analysis (page 1 of 5).



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

May 02, 2011

Bruce Baker

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: VACUUM F-34 BOOT

Enclosed are the results of analyses for samples received by the laboratory on 04/27/11 8:05.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021 Benzene, Toluene, Ethyl Benzene, and Total Xylenes Method SW-846 8260 Benzene, Toluene, Ethyl Benzene, and Total Xylenes

Method TX 1005

Total Petroleum Hydorcarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable

Cardinal Laboratories is accreditated through 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)

Method EPA 524.4

Regulated VOCs (V2, V3)

Accreditation applies to public drinking water matrices.

Celey D. Keine

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Celey D. Keene

Lab Director/Quality Manager

Page 1 of 5

### Appendix A-2: Blended backfill laboratory chloride analysis (page 2 of 5).



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

### Analytical Results For:

Rice Operating Company Bruce Baker 112 W. Taylor Hobbs NM, 88240 Fax To: (575) 397-1471

Received: Reported: 04/27/2011 05/02/2011

NOT GIVEN

Sampling Date: Sampling Type: 04/26/2011 Soil

Project Name: Project Number: VACUUM F-34 BOOT NONE GIVEN

Sampling Condition: Sample Received By: \*\* (See Notes) Jodi Henson

### Sample ID: BLENDED BACKFILL (H100866-01)

Chloride, SM4500CJ-B	mg/	/kg	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1650	16.0	04/29/2011	ND	448	112	400	3.64	

Cardinal Laboratories

\*=Accredited Analyte

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Celeg D. Kuna

Celey D. Keene, Lab Director/Quality Manager

Page 2 of 5

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	Notes and Do	efinitions
ND	Analyte NOT DETECTED at or above the reporting limit	
RPD **	Relative Percent Difference	
**	Samples not received at proper temperature of 6°C or below. Insufficient time to reach temperature.	
	Chloride by SM4500Cl-B does not require samples be received at or below	w 6°C
	Samples reported on an as received basis (wet) unless otherwise noted	
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Cardinal I	aboratories	*=Accredited Analyti

Appendix A-2: Blended backfill laboratory chloride analysis (page 4 of 5).

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Appendix A-2: Blended backfill laboratory chloride analysis (page 5 of 5). Sampler Neme: Project Name: Vacuum F-34 Boo City: 1-16565 States (1/41 Zip: \$8,240 Plana #: 575 - 1593-9174 Fax #: 575-397-14171 Address: 122 W. Taylor Lab I.D. HIDOSOL-ARDINAL LABORATORIES
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Appendix A-3: Imported blow sand field PID reading.

Appendix A-4: Imported blow sand field laboratory chloride analysis (page 1 of 4).



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

May 10, 2011

Hack Conder

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: VACUUM F-34 BOOT

Enclosed are the results of analyses for samples received by the laboratory on 05/09/11 15:00.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021 Benzene, Toluene, Ethyl Benzene, and Total Xylenes Method SW-846 8260 Benzene, Toluene, Ethyl Benzene, and Total Xylenes

Method TX 1005

Total Petroleum Hydorcarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable

Cardinal Laboratories is accreditated through 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)

Method EPA 524.4

Regulated VOCs (V2, V3)

Accreditation applies to public drinking water matrices.

Celey D. Keine

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Celey D. Keene

Lab Director/Quality Manager

Page 1 of 4

Appendix A-4: Imported blow sand field laboratory chloride analysis (page 2 of 4).

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<b>L</b> _7	Lat	OC	ra	toi	rie	S

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

### Analytical Results For:

Rice Operating Company Hack Conder 112 W. Taylor Hobbs NM, 88240 Fax To: (575) 397-1471

Received: Reported: Project Name:

Project Number:

05/09/2011

05/10/2011 VACUUM F-34 BOOT

NONE GIVEN NOT GIVEN

Sampling Date: Sampling Type: 05/09/2011 \*\* (See Notes)

Sampling Condition: Sample Received By:

### Sample ID: IMPORTED BLOWSAND (H100932-01)

Chloride, SH4500CI-8	ang	/kg	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	05/10/2011	ND	448	112	400	0.00	

Cardinal Laboratories

\*=Accredited Analyte

Celeg D. Keene

Celey D. Keene, Lab Director/Quality Manager

Page 2 of 4

Celey D. Keene, Lab Director/Quality Manager

## Appendix A-4: Imported blow sand field laboratory chloride analysis (page 3 of 4).

	CARDINAL Laboratories	PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240
	Notes and D	efinitions
NED	Analyte NOT DETECTED at or above the reporting limit	
RPD ≠≠	Relative Percent Difference	
***	Samples not received at proper temperature of 6°C or below.  Insufficient time to reach temperature.	
_	Chloride by SM4500Cl-B does not require samples be received at or belo	w 6°C
	Samples reported on an as received basis (wet) unless otherwise noted	
Cardinal I -	aboratories	*=Accredited Analyti

Page 3 of 4 🚳

Appendix A-4: Imported blow sand field laboratory chloride analysis (page 4 of 4).

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PHONE:	(505) 393-9174	lobbs, NM 88240 FAX: (505) 397-147 & FIELD REPORT FO		
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### Appendix A-6: Imported pond bottom soil laboratory chloride analysis (page 1 of 4).



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBRS, NM 88240

May 10, 2011

Bruce Baker

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: VACUUM F-34 BOOT

Enclosed are the results of analyses for samples received by the laboratory on 05/06/11 16:25.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021 Benzene, Toluene, Ethyl Benzene, and Total Xylenes

Method SW-846 8260 Benzene, Toluene, Ethyl Benzene, and Total Xylenes

Method TX 1005

Total Petroleum Hydorcarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

Cardinal Laboratories is accreditated through 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)

Method EPA 524.4

Regulated VOCs (V2, V3)

Accreditation applies to public drinking water matrices.

Celey D. Keine

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Celey D. Keene

Lab Director/Quality Manager

Page 1 of 4

## Appendix A-6: Imported pond bottom soil laboratory chloride analysis (page 2 of 4).



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

### Analytical Results For:

Rice Operating Company Bruce Baker 112 W. Taylor Hobbs NM, 88240 Fax To: (575) 397-1471

Received:

05/06/2011

NOT GIVEN

Sampling Date: Sampling Type: 05/06/2011 Soil

Reported: Project Name: Project Number: Project Location: 05/10/2011 VACUUM F-34 BOOT NONE GIVEN

Sampling Condition: Sample Received By: Cool & Intact Jodi Henson

### Sample ID: IMPORTED SOIL POND BTTM (H160924-01)

Chioride, SM4500CI-B	tng,	/kg	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	05/09/2011	ND	448	112	400	0.00	

Cardinal Laboratorles

\*=Accredited Analyte

Celey D. Keine

Celey D. Keene, Lab Director/Quality Manager

Page 2 of 4

## Appendix A-6: Imported pond bottom soil laboratory chloride analysis (page 3 of 4).

	CARDINAL	
	CARDINAL Laboratories	·
		PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240
	Notes and De	finitions
ND	Analyte NOT DETECTED at or above the reporting limit	
RPD	Relative Percent Difference	
**	Samples not received at proper temperature of 6°C or below.  Insufficient time to reach temperature.	
-	Chloride by SN4500Cl-B does not require samples be received at or below	, cor
	Samples reported on an as received basis (wet) unless otherwise noted	
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Cardinal I	aboratories	#=Accordited Analyte
		*=Accredited Analyte in contract or bot, shall be limited to the amount publi by client for analyses. All claims, including those for nephparas and
any other cause	whetsoever shall be deemed walved unless made in writing and received by Curdinal within thirty (30):	in contract or fort, shall be limited to the amount paid by clark for analyses. All claims, including those for negligence and type after completion of the applicable service. In no event shall Cardinal be likele for included or consequently classings, or accusions withing out of or industal to the participance of the services beyonder by Cardinal, regardless of whether such
claim is based upon a	my of the above stated research or otherwise. Results relate only to the samples trindfield above. This report shall not be repor	duced except to his will militims approved of Cardinal Laboratories.
al	ley D. Keine	
Celey D. i	Geene, Lab Director/Quality Manager	
	\	Page 3 of 4

Appendix A-6: Imported pond bottom soil laboratory chloride analysis (page 4 of 4).

Page 4 of 4
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Field Operations (505) 827-5723 P.O. B (575) 392-8736 2702-I (575) 885-1323 N. Cari (575) 623-4979 1001 S	ox 1148 O N. Grimes al, Suite B . Atkinson	Santa Fe, N Hobbs, NM Carlsbad, N Roswell, N	88240 M 88220 M 88210		CONMISS	
(575) 763-0796 105 E.	6 <sup>th</sup> St.	Clovis, NM	88101		ALEX.	MEXIC
1. General Information		VEGET	ATION FO	ORM		
ite name: Vacuum F-34 v			Lease No.:			
I/L or Qtr/Qtr Section	Township	Range	County	Latitude		Longitude (NAD83)
F 34 Company Name: RICE C	17S DPERATING	35E	LEA Contact Nam	32°47'41.352 e: HACK CO		103°26'58.144W
hone no.: (575) 393-		Email:	hconder@rie		NDER	
	AYLOR HOBB	S, NM 88240				
Spill / Release	P&A W	ell 🔲	Pit Closure	Facility Clos	ure 🛛	Other 🔲
CD Spill No.	API No.			Type: JUNC1		
ite size:	acres	16965	square feet	Map detail of	site attach	ed 🔲
						· · · · · · · · · · · · · · · · · · ·
			brought to the surfa			
alvaged from site E E Exture: SANDY E	lioremediated   Sescribe soil & sub	soil SAND C	ed Blend  DVER CALICHE	lea 🔲	Depth (	in):
oil prep methods: Rip	Depth(i		isc Depth (	(in): 8 Re	llerpack [	
ate completed: 5/26/11		otos attached	Nu Nu	imber of photos:		
4. Seeding *Attach	seed bag tags to the	is form. Seed ba	a taas shall contain		CTD	
				the site name and		
ustom seed mix 🛛 Pre	scribed mix 🔲 📗	Seed mix nar	me: 10 LBS WAF		Seeding	date:
ustom seed mix 🛛 Pre	scribed mix	Seed mix nar	me: 10 LBS WAI MIX	RM SEASON		
Pre Pustom seed mix 🖾	scribed mix	Seed mix nar	me: 10 LBS WAF MIX 7.5 LBS BLU	RM SEASON JE GRAMA		date: 5 /26 /11
			me: 10 LBS WAI MIX	RM SEASON JE GRAMA		
s seed mix divided into sub			me: 10 LBS WAR MIX 7.5 LBS BLU 20 LBS RAC OATS Yes □ No ☒	RM SEASON JE GRAMA	Seeding	5/26/11
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Appendix A-7: Revegetation form.