1R-425-84

WORKPLANS

Date: 2-8-13

RICE Operating Company

112 West Taylor • Hobbs, New Mexico 88240 Phone: (575) 393-9174 • Fax: (575) 397-1471

CERTIFIED MAIL RETURN RECEEPT NO. 7007 2560 0000 4569 8838 RECEIVED

FEB 18 2013

Oil Conservation Division 1220 S. St. Francis Drive Santa Fe, NM 87505

February 8, 2013

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: Investigation and Characterization Plan (ICP)
Rice Operating Company – Vacuum SWD System
Vacuum Jct. C-31 (1R425-84): Unit C, Sec. 31, T17S, R35E

Mr. Hansen:

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/usage basis. Environmental projects of this nature require System Party AFE approval prior to work commencing at the site. In general, project funding is not forthcoming until NMOCD approves the work plan. Therefore, your timely review of this submission is greatly appreciated.

For all such environmental projects, ROC will choose the path forward that:

- Protects public health,
- Provides the greatest net environmental benefit,
- Complies with NMOCD Rules, and
- Is supported by good science.

Each site shall generally have three submissions:

- 1. This <u>Investigation and Characterization Plan</u> (ICP) is proposed for gathering data and site characterization and assessment.
- 2. Upon evaluating the data and results from the ICP, a recommended remedy will be submitted in a <u>Corrective Action Plan</u> (CAP), if warranted.

3. Finally, after implementing the remedy, a <u>Termination Request</u> with final documentation will be submitted.

Background and Previous Work

The site is located approximately 0.5 miles southwest of Buckeye, New Mexico in Unit C, Section 31, T17S, R35E as shown on the Site Location Map (Figure 1). NM OSE records indicate that groundwater will likely be encountered at a depth of approximately 117 +/- feet.

In 2009, ROC initiated work on the former Vacuum Jct. C-31 junction boxes. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 30x20x12-ft deep excavation. Each sample was field tested for chloride and organic vapors were measured using a PID, which resulted in elevated chloride concentrations. The excavated soil was blended on site and representative composite samples were sent to a commercial laboratory for analysis of chloride and TPH. Laboratory analysis of the four-wall composite resulted in a chloride concentration of 2,400 mg/kg, a gasoline range organics (GRO) concentration of 69.1 mg/kg, and a diesel range organics (DRO) concentration of 1,110 mg/kg. BTEX analysis of the four-wall composite resulted in benzene and toluene concentrations below detectable limits, an ethyl benzene concentration of 0.363 mg/kg, and a total xylenes concentration of 1.48 mg/kg. Laboratory analysis of the bottom composite resulted in a chloride concentration of 944 mg/kg, a GRO concentration of 158 mg/kg, and a DRO concentration of 1,590 mg/kg. BTEX analysis of the bottom composite resulted in benzene, toluene, and ethyl benzene concentrations below detectable limits, and a total xylenes concentration of 2.77 mg/kg. The blended backfill resulted in a chloride concentration of 1,200 mg/kg, a GRO concentration of 10.4 mg/kg, and a DRO concentration of 1,130 mg/kg. The blended backfill was returned to the excavation up to 5 ft below ground surface (bgs) and a geosynthetic and plastic liner were installed. The remaining backfill was blended with clean, imported soil and analyzed by a commercial laboratory for chloride and TPH. Laboratory analysis of the blended backfill II resulted in a chloride concentration of 400 mg/kg, a GRO concentration below detectable limits, and a DRO concentration of 312 mg/kg. The blended backfill II was returned to the excavation to ground surface and was used to contour the site to the surrounding area. On June 8, 2009, the site was seeded with a blend of native vegetation.

NMOCD was notified of potential groundwater impact on March 12, 2010, and a junction box disclosure report (Appendix A) was submitted to NMOCD with all the 2009 junction box closures and disclosures.

ROC proposes additional investigative work at the site to determine if there is potential for groundwater degradation from residual chlorides and hydrocarbons at the site.

Proposed Work Elements

- 1. Conduct vertical and lateral delineation of residual soil chlorides and hydrocarbons from samples taken using a drill rig, hand auger, and/or backhoe (see Appendix B for Quality Procedures).
 - a. Vertical sampling will be conducted until the following criteria are met in the field.
 - i. Three samples in which the chloride concentration decreases and the third sample has a chloride concentration of ≤ 250 ppm; and,
 - ii. Three samples in which PID readings decrease and the third sample has a PID reading of < 100 ppm; or,
 - iii. The sampling reaches the capillary fringe.
 - b. Lateral sampling will be conducted until the following criteria are met in the field.
 - i. A decrease is observed in chloride concentrations between lateral bores at similar depths; and,
 - ii. A chloride concentration of ≤ 250 ppm is observed in a lateral surface sample; or,
 - iii. Safety concerns impede further lateral delineation.
- 2. If warranted, install a monitor well to provide direct measurement of the potential groundwater impact at the site. Additional monitoring wells may be required to fully delineate groundwater quality. (All monitor wells will be installed by EPA, NMOCD, and industry standards.)
- 3. Evaluate the risk of groundwater impact based on the information obtained.

If the evaluation of the site shows no threat to groundwater from residual chlorides, then only a vadose zone remedy will be undertaken. However, if groundwater shows impact from residual chlorides, a CAP will be developed to address these concerns.

ROC appreciates the opportunity to work with you on this project. Please call me at (575) 393-9174 if you have any questions or wish to discuss the site.

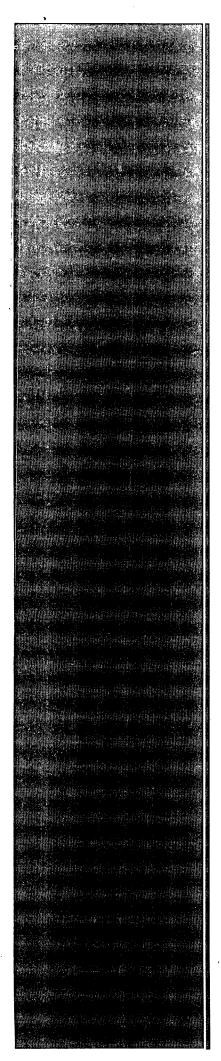
Sincerely,

Rice Operating Company

Hack Conder

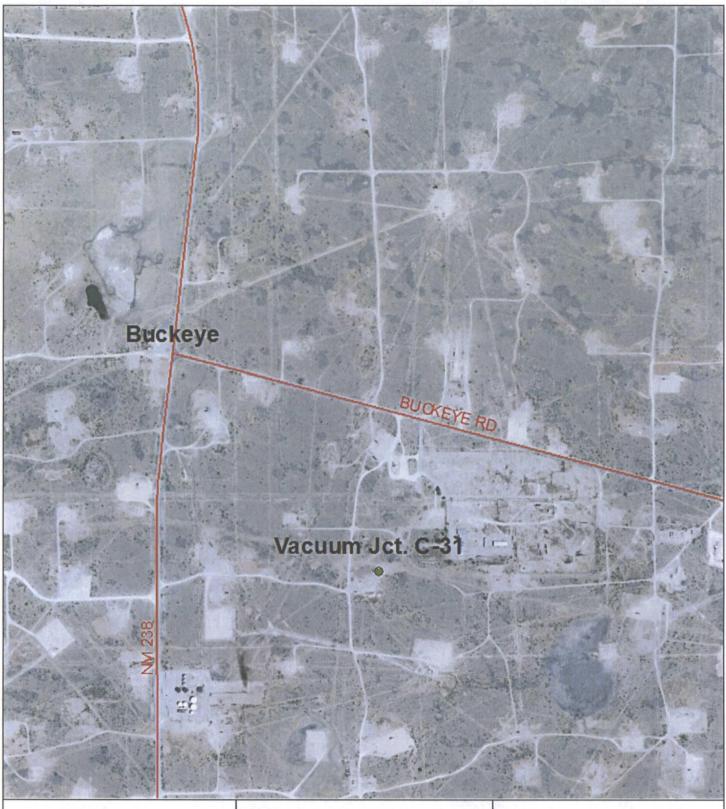
Environmental Manager

enclosures



Figures

RICE Operating Company (ROC) 112 West Taylor Hobbs, NM 88240 Phone 575.393.9174 Fax 575.397.1471



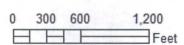


Vacuum Jct. C-31

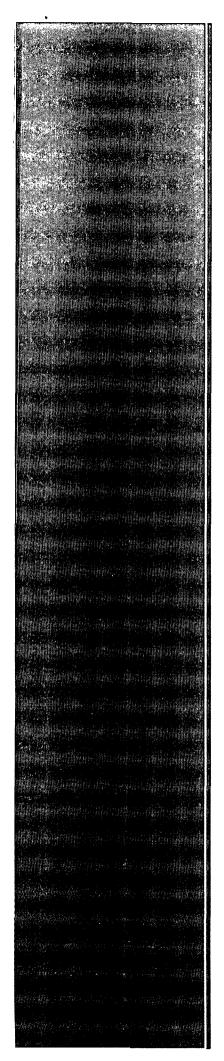
Unit C, Section 31, T17S, R35E 1R425-84

Figure 1





Drawing date: 2-8-13



Appendix A Junction Box Disclosure Report

RICE Operating Company (ROC) 112 West Taylor Hobbs, NM 88240 Phone 575.393.9174 Fax 575.397.1471

RICE OPERATING COMPANY JUNCTION BOX DISCLOSURE REPORT

	BOX LOCATION SWD SYSTEM JUNCTION UNIT SECTION TOWNSHIP RANGE COUNTY BOX DIMENSIONS - FEET										
	SWD SYSTEM	JUNCTION Jct. C-31	UNIT	SECTION	TOWNSHIP	RANGE	cour	Len		Width	Dapth
	Vacuum	(2 boxes)	С	31	178	35E	Le		a I	Eliminated	- Соры
	LAND TYPE: B	вьм	STATE	FEE LA	NDOWNER		Duke Energ	<u>o</u>	THER_		
	Depth to Groun	ndwater	117	feet	NM	OCD SITE	ASSESSI	MENT RANKI	NG SC	ORE:	0
	Date Started	2/16/	2009	Date Co	mpleted	6/8/20	09	OCD Witnes	s	no	
	Soil Excavated	266.7	cubic yar	ds Exc	cavation Le	ength	30	Width 2	0	Depth	12 feet
	Soil Disposed	156	cubic yan	ds Of	fsite Facility	s	undance	Loc	cation	Eunice	e, NM
FIN	5/5/2009, 5/6/2009, INAL ANALYTICAL RESULTS: Sample Date5/11/2009, 6/2/2009										
	Procure 5-point composite sample of bottom and 4-point composite sample of sidewalls. TPH, BTEX and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines.										
	Sample	Benze					D (field)	GRO	T	DRO	Chlorides
	Location 4-WALL COMP.	mg/k <0.05					ppm 205.0	mg/kg 69.1	+	mg/kg 1110	mg/kg 2,400
_	BOTTOM COMP.						190.0	158		1590	944
	ENDED BACKFIL	A 12 11 11 12 12 12 12 12 12 12 12 12 12		erne er inner er	- 1	यु: र कार्य	111.0	10.4		1130	1,200
	ENDED BACKFIL	2024 (47. 474)	Anna Long Marine			2.5 304	55.0	<10.0	+	312	400
	ng the Vacuum SW oved, an investigation				<u></u>		jular .	LOCAT	ION	DEPTH	mg/kg
	vals producing a 30									1'	570
acl	sample and yielde	d elevated co	oncentrations.	. Organic va	pors were m	easured usin	ng a PID			2'	840
vhic	th yielded some ele-	vated concer	trations. The	excavated s	oil was blend	ded on site.				3'	504
₹ep	resentative compos	ite samples v	vere collected	from the ble	ended excava	ated soil, bot	tom,	vertic	al	4	346
ind	walls and sent to a	commercial I	aboratory for	analysis. La	boratory ana	lysis of the		delinea		5'	359
epr	esentative samples	confirmed el	evated conce	ntrations of c	hloride and I	DRO. The b	lended	trench, a	t5ft	6'	360
xc	avated soil was retur	rned to the ex	xcavation up t	o 5 ft below	ground surfa	ce (BGS) wh	nere a	west of		7'	258
jeo	synethetic and plast	tic liner were	installed. The	e remaining	backfill was t	blended with	clean,	juncti (sour		8'	231
	orted soil and used							. (3007)	,	.9'	227
	ounding area. On 6							.		10'	. 266
···	ected to return to a p		pacity at a no	ormal rate; N	MOCD was	notified of po	otential	.]		11'	303
3ro	undwater impact on	3/12/2010.								. 12'	331
	ADDITIONAL EVALUATION IS LOW PRIORITY										
	enclosures: photos, lab results, PID (field) screenings, cross-section, BTEX study, chloride curve										
	I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY NOWLEDGE AND BELIEF. ITE SUPERVISOR										
PRO	DJECT LEADER	Lany Bruce B	aker Jr. SIC	NATÚRE	dany	Bruce	Baker;	M.	DATE	3-2	5-10
	e This at	"DICCI	OCCUPE OF ILL	والمستسيدة فتركبكا الكار		and the same of the first		ومرام المراجع والمراجع والمراجع			

"This site is a "DISCLOSURE." It will be placed on a prioritized list of similar sites for further consideration.

Vacuum Jct C-31



Site prior to excavation (east)

2/16/2009



45X20 geosynthetic liner installed

5/28/2009

Unit C, Section 31, T17S, R35E



Sampling source (south west)

2/16/2009



(north)

6/8/2009

Seeding backfilled site



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

Analysis Date: 05/06/09 Sampling Date: 05/05/09

Sample Type: SOIL
Sample Condition: COOL & INTACT

Sample Received By: ML

05/12/09

Analyzed By: HM

Receiving Date: 05/05/08
Reporting Date: 05/06/09
Project Number: NOT GIVEN
Project Name: VACUUM JCT C-31
Project Location: VACUUM JCT C-31

LAB NO. SAMPLE ID CIT (mg/kg)

H17369-1	5 PT BTM COMP	944
H17369-7	4 WALL COMP	2,400
Quality Contro){	490
True Value Q		500
% Recovery		98.0
Relative Perce	ent Différence	2.0

METHOD: Standard Methods 4500-CIB

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

D:

H17369 RICE



ANALYTICAL RESULTS FOR RICE OPERATING COMPANY ATTN: JORDAN WOODFIN 122 W. TAYLOR HOBBS, NM 88240



Receiving Date: 05/05/09
Reporting Date: 05/08/09
Project Number: NOT GIVEN
Project Name: VACUUM JCT C-31
Project Location: VACUUM JCT C-31

Sampling Date: 05/05/09 Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: AB

 $\begin{array}{ccc} & & & GRO & DRO \\ & & & (C_6\text{-}C_{10}) & (>C_{10}\text{-}C_{28}) \\ \text{LAB NUMBER SAMPLE ID} & & (mg/kg) & (mg/kg) \\ \end{array}$

ANALYSIS DATE	05/08/09	05/08/09
H17369-1 5PT BTM COMP	158	1,590
H17369-7 4 WALL COMP	69.1	1,110
Quality Control	567	529
True Value QC	500	500
% Recovery	113	106
Relative Percent Difference	1.9	<0.1

METHODS: TPH GRO & DRO: EPA SW-846 8015 M

Chemist

Date



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

Receiving Date: 05/05/09
Reporting Date: 05/11/09
Project Number: NOT GIVEN
Project Name: VACCUM JCT C-31

Project Location: VACCUM JCT C-31

Y Comment of the second

Sampling Date: 05/05/09-Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: ZL

				ETHYL	TOTAL
		BENZENE	TOLUENE	BENZENE	XYLENES
LAB NUMBE	EF SAMPLE ID	(mg/kg)	(ṃg/kg)	(mg/kg)	(mg/kg)
ANALYSIS [DATE	05/10/09	05/10/09	05/10/09	05/10/09
H17369-1	5FT BTM COMP	<0.050	<0.050	<0.050	2.77
H17369-C	COMPOSITE OF BTM PT. #1 THRU #5	<0.050	<0.050	0.383	2.10
H17369-7	4 WALL COMP	<0.050	<0.050	0.363	1.48
		<u> </u>			
Quality Con	trol.	0.053	0.053	0.048	0.152
True Value		0.050	0.050	0.050	0.150
% Recovery		106	106	96.0	101
 	rcent Difference	7.5	12.0	11.1	9.2

METHOD: EPA SW-846 8021B

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE,

AND TOTAL XYLENES.

Chemist

Date

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

RDINAL LABORATORIES

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

Company Name	RICE OPERATING						4111114 4111114	Ł	3/1	LL TO	ilakiç siliksi Van unvenus.	li			,	ANA	LYSI	S RE	QUE	ST			
Project Manage	JORDAN WOODFIN					P	.O. #	:															
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City: HOBB	5 State: NM	Zip	8	8 S.C.	0	A	ttn:					1					1						
Phone #: 39	3-9174 Fax#:						ddre	ss:								<u> </u>							
Project #:	Project Owne	r:_				<u> c</u>	ity:										ļ.					İ	
Project Name:	Vacuum Jet C-31	1				s	tate:			Zip:		ŀ										ĺ	
Project Location	: Vacuum Jet C-	3/				Р	hone	#:					کا									ĺ	
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Lab I.D.	Sample I.D.	AB OR (C)OMP.	# ÇONTAINERS	GROUNDWATER WASTEWATER		SLUDGE	ACID/BASE:	ICE / COOL	ER!				PH®	ンドルメ									
		(G)RAB	OÒ#	GRO	힔등	SLUC	P G G	SE	E	DATE	TIME	7	-	100									
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[†] Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476



ANALYTICAL RESULTS FOR RICE OPERATING COMPANY ATTN: JORDAN WOODFIN 122 W. TAYLOR

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

Receiving Date: 05/05/09 Reporting Date: 05/11/09 Project Number: NOT GIVEN

Project Name: VACCUM JCT C-31
Project Location: VACCUM JCT C-31

Sampling Date: 05/05/09 Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: ZL

LAB NUMBI	EF SAMPLE ID	BENZENE, (mg/kg)	TOLUENE (mg/kg)	ETHYL BENZENE (mg/kg)	TOTAL XYLENES (mg/kg)
ANALYSIS	DATE	05/11/09	05/11/09	05/11/09	05/11/09
H17368-C	COMPOSITE OF NORTH,	< 0.050	<0.050	0.379	1.48
	SOUTH, EAST, AND WEST	·			
	WALLS				
Quality Con	trol	0.053	0.053	0.048	0.152
True Value	QC	0.050	0.050	0.050	0.150
% Recovery	1	106	106	96.0	101
Relative Pe	rcent Difference	7.5	12.0	11.1	9.2

METHOD: EPA SW-846 8021B

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENŽENE, TOLUENE, ETHYL BENZENE,

AND TOTAL XYLENES:

Chemist

Date

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603

(325) 673-7001 FAX (325)673-7020

Company Name	Company Name: RICE OFERATING			BILL TO ANALYSIS REQUEST						
Project Manage	DORDANI WOODEN	~	P.O. #:					- 1		
Address: / 2	Z W. TAVEDE		Company;						1	
1	City: 1-6885 State M Zip: 88240						0	.		
	3-9174 Fax#:		A'ddress:			.				
Project #:	Project Owne	*	City:				5) [
Project Name: 20 Vacuum Jet C-31			State: Zip:				$\langle $	ŀ		
Project Location		C-31	Phone #:		-					
Sampler Name:	DEDAN MOODE	·cV	Fax #:							
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- 4	west wall	CIX	X 5-5-09	2:540		() • • 9			ZZ_{\bullet}	
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IPLEASE NOTE: Libitity of	nd Demages. Cardinal's liability and client's exclusive remedy for ng those for negligence and any other cause inpotecaver shall be	iny claim arising whether based in contract	or tert, shall be limited to the amount paid received by Cardinal within 30 days after	d by the client for the	e andicable					
service, in no event shall C	ardinal be fable for incidental or consequental damages, includin ng out of or related to the performance of services hereigides by (y vitrout linication, business interruptions,	loss of use, or loss of profits incurred by o	client, its subsidiarie	6				•	
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[†] Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476



ANALYTICAL RESULTS FOR RICE OPERATING COMPANY ATTN: JORDAN WOODFIN 122 W. TAYLOR HOBBS, NM 88240

COPY

Receiving Date: 05/11/09 Reporting Date: 05/12/09 Project Number: NOT GIVEN

Project Name: VACUUM JCT C-31
Project Location: VACUUM JCT C-31

Sampling Date: 05/11/09 Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: ML Analyzed By: AB/HM

GRO DRO

(C₆-C₁₀) (>C₁₀-C₂₈)

CI*

LAB NUMBER SAMPLE ID

(mg/kg) (mg/kg) (mg/kg)

ANALYSIS DATE	05/12/09	05/12/09	05/12/09
H17403-1 BLENDED BACKFILL	10.4	1,130	1,200
•			
	, i		
Quality Control	518	436	500
True Value QC	500	500	500
% Recovery	104	87.2	100
Relative Percent Difference	1.2	1.0	< 0.1

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI: Std. Methods 4500-CIB *Analysis performed on a 1:4 w;v aqueous extract.

Chemist

Date

H17403 TCL RICE

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

AR.	DINAL	LABO	ORAT	OR	lES
	104 Each	Marland	Hobbs	AL R.E.	222

101 East Marland, Hobbs, NM 88240 (575) 393-2326 Fax (575) 393-2476

(575) 393-2326 Fax (575) 393-2476	<u>. </u>	Pageof	
Company Name: PICE OPERATION CO	BILL TO	ANALYSIS REQUEST 7	'/
Project Manager: JOTZDAN WOODFIN	P.O. #:		3
Address: 122 LV. TAYCOR	Company:]	
ity: Hobbs State:NM Zip:38240	Attn:		(
Hone #: 393.9174 Fax #:	Address:		`
Project #: Project Owner:	City:		
roject Name: 1/accused JE + (-31	State: Zip:		
roject Location: Vacuum Jct C-51 pler Name: JO 12091 1 1 200511	Phone #:		
pler Name: JORDAN (CLOOPEIN	Fax #:	[5]	
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EASE NOTE: Liability and Omnages. Cardinal's liability and client's evaluative remedy for any claim arising whether based in occurring a subject of the cause whatsoever shall be deemed waived unless made in writer.	ig and received by Cardinal within 30 days after completion of the	the applicable	
rvice. In no event shall Cardinal be liable for incidental or consequental damages, including without limitation, business interfup Mates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such	claim is based upon any of the tiliove stated reasons or otherwi-	fae.	
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[†] Cardinal cannot accept verbal changes. Please fax written changes to 575-393-2476.

RICE OPERATING COMPANY



122 West Tayor Flobbs, NM 88240
PHONE: (575) 393-9174 FAX: (575) 397-1471
PID METER CALIBITATION & FIELD REPORT FORM

	Check Mod	ei Number:		•
Model, PGM 7300 Model, PGM 7300 Model; PGM 7300	Serial No: 590-000183 Serial No: 590-000508 Serial No: 590-000504		Model: PGM 7600 Model: PGM 7600 Model: PGM 7600	Serial No: 110-023920 Serial No: 110-013744 Serial No: 110-013670

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 08-3425	EXPIRATION DATE: 8-25-09
FILL DATE: 2-29-08	METER READING ACCURACY: 98.0

ACCURACY: +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
Vac	C-31	<u> </u>	31	17	35

SAMPLE ID	PID	SAMPLE ID	PID
pt 1	250	North	94
pt ?	22.5	North South EAST	414
pt 3	575	EAST	97
pt 4	75	WEST	203
pt 5	55	4 Wall Comp	205
5pt Btn Comp	490		
		Blended Backfill	111
		<u> </u>	

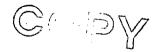
I verify that I have calibrated the above instrument in accordance to the manufacture operation manual.

SIGNATUE: Joedon Ward

DATE: 5-5-09



ANALYTICAL RESULTS FOR RICE OPERATING COMPANY ATTN: JORDAN WOODFIN 122 W. TAYLOR HOBBS, NM 88240



Receiving Date: 06/02/09 Reporting Date: 06/05/09

Project Number: NOT GIVEN
Project Name: VACUUM JCT C-31

Project Location: VACUUM JCT C-31

Sampling Date: 06/02/09

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: AB

GRO DRO

(C₆-C₁₀) (>C₁₀-C₂₈)

CI*

LAB NUMBER SAMPLE ID

(mg/kg) (mg/kg)

(mg/kg)

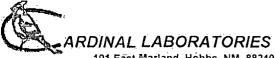
ANALYSIS DATE	06/04/09	06/04/09	06/03/09
H17539-1 BLENDED BACKFILL II	<10.0	312	400
Quality Control	486	453	490
True Value QC	500	500	500
% Recovery	97.2	90.6	98.0
Relative Percent Difference	2.5	0.6	2.0

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CIT: Std. Methods 4500-CITB *Analysis performed on a 1:4 w.v aqueous extract. Reported on wet weight.

Chemist

Date

H17539 TCL RICE





101 East Marland, Hobbs, NM 88240 (575) 393-2326 Fax (575) 393-247

(5/5) 393-2326 Fax (5/5) 393-24/6		
Company Name: PICE OPERATING	BILL TO	ANALYSIS REQUEST
Project Manager: Junior New Luck ラディア	P.O. #:	
Address: 122. W. TAYLOR	Company:	
City: HOSPS State NA Zip: 88740	Attn:	
Phone #: 3073-9074 Fax.#:	Address:	
Project #: Project Owner:	City:	
Project Name: Vacuum Jot C-31	State: Zip:	
Project Location: Vaccinia It (-3/	Phone #:	[
pler Name: JOFDAN WEODE	Fax #:	
Tancial Land Containers The Containers The Solution of the s	PRESERV. SAMPLING OTHER: OTH	LACIOSAL SALISONSAL
PLEASE NOTE: Usbays and Damages. Cardinal's liability and clients evolutive remody for any claim arising whether based in contract analyses. All claims including those for negligence and any other cause whistoever shall be deemed watered unless made in writing any service. In one event shall Cardinal be liable for incidential or consequential damages, including without limitation, business interruptions, affiliates or successors arising out of or related to the performance of services herounder by Cardinal, regardless of whether such claim. Sampler Relinquished: Date: Time: Delivered By: Circle One) Temp. Sample Conditions and the performance of services are conditions.	d received by Cardinal within 30 days after completion of thicks of use, or loss of profits incurred by client, its subsidiant is based unon any of the above stated reasons or otherwise. Phone Res Fax Result REMARKS	e applicable ea. es. sult: No Add'I Phone #: t: No Add'I Phone #: t: Rice No Add'I Phone #: t: TRURY CESCIC COM
Sämpler - UPS - Bus - Other: Cool Intact	s (Initials)	JUCODAN @ RICESIND CO.L.

† Cardinal cannot accept verbal changes. Please fax written changes to 575-393-2476.

RICE OPERATING COMPANY

122 West Tayor Hobbs, NM 88240 PHONE: (575) 393-9174 FAX: (575) 397-1471 PID METER CALIBRATION & FIELD REPORT FORM

		Check M	odel Number:	•	
	Model: PGM 7300	Serial No: 590-000183		Model: PGM 7600	Serial No: 110-023920
	Model: PGM 7300	Serial No: 590-000508		Model: PGM 7600	Serial No: 110-013744
i√	Model: PGM 7300	Serial No: 590-000504		Model: PGM 7600	Serial No: 110-013670
	GAS CO	MPÖSIIION: ISÖBUTYLE	ENF TOOPPM / ATR+ F	RALANCE	
F					
LOT NO :	08342 <i>5</i>	ļ.	EXPIRATION DATE:	8-29-09	

METER READING ACCURACY: 100

ACCURACY: +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
Vacuum	C-31	C	31	173	35 E

SAMPLE ID	PID	SAMPLE ID	PID
Blended Backfill I	55		
		, .	
		OPY	
•			
	•		

I verify that I have calibrated the above instrument in accordance to the manufacture operation manual.

Jordan Woolf

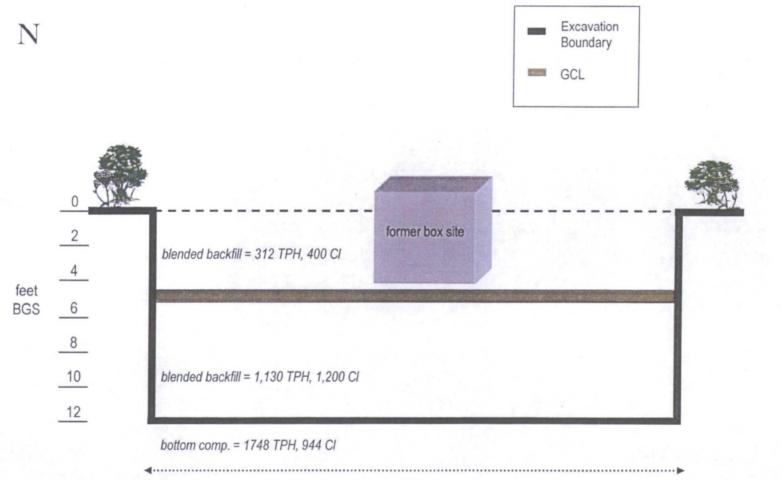
7-79-08

FILL DATE:

DATE: 6-2-09

Vacuum Jct C-31 Unit 'C', Sec. 31, T17S, R35E

Excavation Cross-Section



S

2009 BTEX Study

Revised Junction Box Upgrade Plan (2003)

System:

Site:

Vacuum

Jct. C-31

Date:

Sampler:

5/5/2009

Jordan Woodfin

Laboratory:

Cardinal

Laboratories

Location	Companint	PID reading	FIELD COMPOSITE (mg/kg)			
Location	Component	(ppm)	Benzene	Toluene	Ethyl Benzene	Total Xylenes
4-wall composite at 30 ft x 20 ft	North Wall	94				
	South Wall	414	<0.050	<0:050	0.363	1.48
	East Wall	97				
	West Wall	203				
				LAB COMPOSI	TE (mg/kg)	
			<0.050	<0.050	0.379	1.48

Field PID tests <100 ppm are considered final for BTEX. If PID is >100 ppm, the components of the BTEX composite sample will be collected individually and will be composited under laboratory conditions to prevent excessive volatilization. A 15-box, 30-sample study will be made to compare field-compositing with lab-compositing BTEX samples. Composite components are collected in a skewed 'W' pattern. Revised Junction Box Upgrade Work Plan (July 16, 2003)

2009 BTEX Study

Revised Junction Box Upgrade Plan (2003)

System:

Site:

Vacuum

Jct. C-31

Date:

Sampler:

5/5/2009

Jordan Woodfin

Laboratory:

Cardinal

Laboratories

Location	Component	PID reading	FIELD COMPOSITE (mg/kg)				
Location	Component	(ppm)	Benzene	Toluene	Ethyl Benzene	Total Xylenes	
	1	250					
bottom composite at 12 ft BGS	2	22.5	<0.050	<0.050	<0.050	2.77	
	3	575					
	:4	75					
	5	55					
				LAB COMPOSIT	ΓE (mg/kg)		
			<0.050	<0.050	0.383	2.10	

Field PID tests < 100 ppm are considered final for BTEX. If PID is >100 ppm, the components of the BTEX composite sample will be collected individually and will be composited under laboratory conditions to prevent excessive volatilization. A 15-box, 30-sample study will be made to compare field-compositing with lab-compositing BTEX samples. Composite components are collected in a skewed 'W' pattern.

Revised Junction Box Upgrade Work Plan (July 16, 2003)

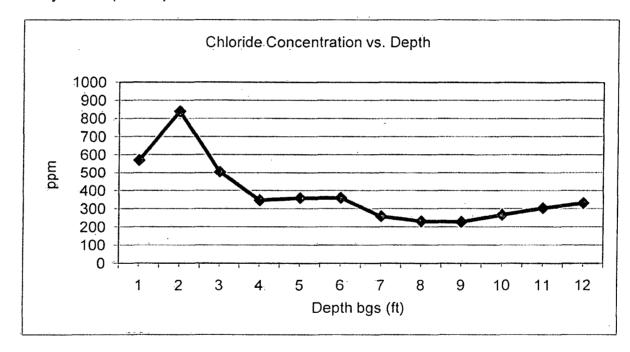
Vacuum Jct C-31

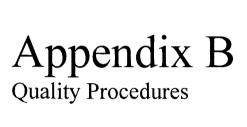
Unit 'C', Sec. 31, T17S, R35E

Backhoe samples at 5 ft west of the junction (source)

Depth bgs (ft)	[Cl] ppm
1	570
2	840
3	504
4	346
5	359
6	360
7	258
8	-231
9	.227
10.	266
11	303
12	331

Groundwater = 117 ft





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RICE Operating Company (ROC) 112 West Taylor Hobbs, NM 88240 Phone 575.393.9174 Fax 575.397.1471

Quality Procedures

Table of Contents

QP-1	Soil Samples for Transportation to a Laboratory
QP-2	Chloride Titration Using 0.282 Normal Silver Nitrate Solution
QP-3	Development of Cased Water-Monitoring Wells
QP-4	Sampling of Cased Water-Monitoring Well
QP- 5	Composite Sampling of Excavation Sidewalls and Bottoms for TPH and Chloride Analysis
QP-6	Sampling and Testing Protocol for VOC in soil
QP-7	Composite Sampling of Excavation Sidewalls and Bottoms for BTEX
∩p_8	Procedure for Plugging and Ahandonment of Cased Water-Monitoring wells

Quality Procedure Soil Samples for Transportation to a Laboratory

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.
- 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.

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

- 5.3 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.
- 5.4 Place the sample directly on ice for transport to the laboratory if required.
- 5.5 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. Project and sample name.
 - b. Signed copy of the original Chain of Custody Form including 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

QUALITY PROCEDURE Chloride Titration Using 0.282 Normal Silver Nitrate Solution

1.0 Purpose

This procedure is to be used to determine the concentration of chloride in soil.

2.0 Scope

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

3.0 Sample Collection and Preparation

- 3.1 Collect at least 80 grams 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 for 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).
- 3.2 The soil sample(s) shall be immediately inserted into a one-quart or larger polyethylene freezer bag. Care should be taken to insure that no cross-contamination occurs between the soil sample and the collection tools or sample processing equipment.
- 3.3 The sealed sample bag should be massaged to break up any clods.

4.0 Sample Preparation

- 4.1 Tare a clean glass vial having a minimum 40 ml capacity. Add at least 10 grams of the soil sample and record the weight.
- 4.2 Add at least 20 grams of reverse osmosis water to the soil sample and shake well.
- 4.3 Allow the sample to set for a period of 5 minutes or until the separation of soil and water.

5.0 Titration Procedure

- 5.1 Using a graduated pipette, remove 10 ml extract and dispense into a clean plastic cup.
- 5.2 Add 2-3 drops potassium chromate (K₂CrO₄) to mixture if necessary.

- 5.3 Using a 1 ml pipette, carefully add .282 normal silver nitrate (one drop at a time) to the sample while constantly agitating it. Stop adding silver nitrate when the solution begins to change from yellow to red. Be consistent with endpoint recognition.
- 5.4 Record the ml of silver nitrate used.

6.0 Calculation

To obtain the chloride concentration, insert measured data into the following formula:

Using Step 5.0, determine the chloride concentration of the RO water used to mix with the soil sample. Record this concentration and subtract it from the formula results to find the net chloride in the soil sample.

Record all results on the delineation form.

Quality Procedure Development of Cased Water-Monitoring Wells

1.0 Purpose

This procedure outlines the methods to be employed to develop cased monitoring wells.

2.0 Scope

This procedure shall be used for developed, cased water monitoring wells. It is not to be used for standing water samples such as ponds or streams.

3.0 Sample Collection and Preparation

- 3.1 Prior to development, the static water level and height of the water column within the well casing will be measured with the use of an electric D.C. probe.
- 3.2 All measurements will be recorded within a field log notebook.
- 3.3 All equipment used to measure the static water level will be decontaminated after each use by means of Liquinox, a phosphate free laboratory detergent, and water to reduce the possibility of cross-contamination. The volume of water in each well casing will be calculated.

4.0 Purging

- 4.1 Wells will be purged by using a 2" decontaminated submersible pump or dedicated one liter Teflon bailer. Wells should be purged until the pH and conductivity are stabilized and the turbidity has been reduced to the greatest extent possible.
- 4.2 If a submersible is used the pump will be decontaminated prior to use by scrubbing the outside surface of tubing and wiring with a Liquinox water mixture, pumping a Liquinox-water mixture through the pump, and a final flush with fresh water.

5.0 Water Disposal

5.1 All purge and decontamination water will be temporarily stored within a portable tank to be later disposed of in an appropriate manner.

6.0 Records

6.1 Rice Environmental Consulting and Safety will record the amount of water removed from the well during development procedures. The purge volume will be reported to the appropriate regulatory authority when filing the closure report.

Quality Procedure Sampling of Cased Water-Monitoring Well

1.0 Purpose

This procedure outlines the methods to be employed in obtaining water samples from cased monitoring wells.

2.0 Scope

This procedure shall be used for developed, cased water monitoring wells. It is not to be used for standing water samples such as ponds or streams.

3.0 Preliminary

- 3.1 Obtain sterile sampling containers from the testing laboratory designated to conduct analyses of the water.
- 3.2 The following table shall be used to select the appropriate sampling container, preservative method and holding times for the various elements and compounds to be analyzed.

Compound to be	Sample Container	Sample Container	Cap Requirements	Preservative	Maximum Hold Time
Analyzed	Size	Description	requirements		11014 11111
BTEX	40 ml	VOA Container	Teflon Lined	HCL	14 days
TPH (8015 Extended)	40 ounces	(2) 40ml VOA vials	Teflon Lined	HCL and Ice	14 days
PAH	1 liter	amber glass	Teflon Lined	Ice	7 days
Cation/Anion	1 liter	HD polyethylene	Any Plastic	None	48 Hrs
Metals	1 liter	HD polyethylene	Any Plastic	Ice/HNO ₃	⁽ 28 Days
TDS	300 ml	clear glass or 250 ml HD polyethylene	Any Plastic	Ice	7 Days
Cl-	500 ml	HD polyethylene	Any Plastic	None	28 Days

4.0 Chain of Custody

- 4.1 Prepare a Sample Plan. The plan will list the well identification and the individual tests to be performed at that location. 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 Bailing Procedure

- 5.1 Identify the well from the sites schematics. Place pre-labeled jar(s) next to the well. Remove the plastic cap from the well bore by first lifting the metal lever and then unscrewing the entire assembly.
- 5.2 Using a dedicated one liter Teflon bailer or submersible pump, purge a minimum of three well volumes. Place the water in storage container for transport to a ROC disposal facility.
- 5.3 If using a bailer, take care to insure that the bailing device and string does not become cross-contaminated. A clean pair of nitrile gloves should be used when handling either the retrieval string or bailer. The retrieval string should not be allowed to come into contact with the ground.

6.0 Sampling Procedure

- 6.1 Once the well has been bailed in accordance with 5.2 of this procedure, a sample may be decanted into the appropriate sample collection jar directly from the bailer or submersible pump.
- 6.2 Note the time of collection on the sample jar with a fine Sharpie.
- 6.3 Place the sample directly on ice for transport to the laboratory. The preceding table shows the maximum hold times between collection and testing for the various analyses.

6.4 Complete the Chain of Custody form to include the collection times for each sample. Deliver all samples to the laboratory.

7.0 Documentation

- 7.1 The testing laboratory shall provide the following minimum information:
 - A. Project and sample name.
 - B. Signed copy of the original Chain of Custody Form including 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

Calculation for Determining the Minimum Bailing Volume for Monitor Wells Formula $V=(\pi r^2 h)$ 2" well [V/231=gal] X 3 = Purge Volume

V=Volume

π=pi

r=inside radius of the well bore

h=maximum height of well bore in water table

Example:

π	r^2	h(in)	V(cu.in)	V(gal)	X 3 Volumes	Actual
3.1416	1	180	565.488	2.448	7.34 gal	>10 gal

Quality Procedure Composite Sampling of Excavation Sidewalls and Bottoms For TPH and Chloride Analysis

1.0 Purpose

This procedure outlines the methods to be employed when obtaining final composite soil samples for TPH and Chloride analysis.

2.0 Scope

This procedure is to be used in conjunction with *Quality Procedure* – 02: Soil Samples for Transportation to a Laboratory and will be inserted at subparagraph 5.2 of Section 5.0: Sampling Procedure.

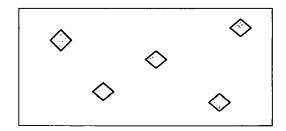
3.0 Sampling Procedure

Follow *Quality Procedure – 02: Soil Samples for Transportation to a Laboratory* for all Sections and subparagraphs until subparagraph 5.2 of Section 5.0: Sampling Procedure. Instead of 5.2 instructions, perform the composite sample collection procedure as follows:

3.1 Go to the excavation with a new plastic baggie. If not analyzing for ions or metals, use a trowel to obtain the soil. If the excavation is deeper than 6' BGS, do not enter the pit, but use a backhoe to assist in procurement of the sample. (If a backhoe is used, the backhoe will obtain an amount of soil from each composite point; bring the purchase to the surface staging area where a sample-portion of soil will be extracted from the backhoe purchase. The remainder of the backhoe purchase will be staged on the surface with other staged soils.)

3.2 Sidewall samples

3.2.1 On each sidewall, procure a 5oz sample from each of five distinct points on the sidewall with distinct points resembling the "W" pattern:



- 3.2.2 Thoroughly blend these five samples in a labeled baggie.
- 3.2.3 Repeat steps 3.2.1 through 3.2.4 for each remaining sidewall.
- 3.2.4 From each labeled baggie, procure a 5 oz portion and pour into a baggie labeled "Sidewall Composite". Blend this soil mixture completely.
- 3.2.5 Obtain proper laboratory sample container for "Sidewall Composite" and continue with subparagraph 5.3 of QP 01.

3.3 Bottom Sample

- 3.3.1 From bottom of excavation, procure a 5oz sample from each of five distinct points with distinct points resembling the "W" pattern as illustrated above.
- 3.3.2 Thoroughly blend these five samples in a clean baggie.
- 3.3.3 Obtain proper laboratory sample container for "Bottom Composite" and continue with subparagraph 5.3 of QP 01.

QUALITY PROCEDURE Sampling and Testing Protocol for VOC in Soil

1.0 Purpose

This procedure is to be used to determine the concentrations of Volatile Organic Compounds in soils.

2.0 Scope

This procedure is to be used as the standard field measurement for soil VOC 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. Record the sample name and the time that the sample was collected on the Field Analytical Report Form.
 - 3.1.3 The sealed samples shall be allowed to set for a minimum of five minutes at a temperature of between 10-15 Celsius, (59-77 F). The sample temperatures may be adjusted by cooling the sample in ice, or by heating the sample within a generally controlled environment such as the inside of a vehicle. The samples should not be placed directly on heated surfaces or placed in direct heat sources such as lamps or heater vents.
 - 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 RAE Systems Photoionization device. (Device will be identified on VOC Field Test Report Form.) Prior to use, the instrument shall be zeroed-out in accordance with the appropriate maintenance and calibration procedure outlined in the instrument operation manual. The PID device will be calibrated each day it's used.
- 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 sidewalls of the bag.
- 3.2.3 Set the instrument to retain the highest result reading value. Record the reading onto the Field Test Report Form.
- 3.2.4 If the instrument provides a reading exceeding 100 ppm, proceed to QP-7. If the reading is 100 ppm or less, NMOCD BTEX guideline has been met and no further testing for BTEX is necessary. File the Field Test Report Form in the project file.

4.0 Clean-up

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.

Quality Procedure Composite Sampling of Excavation Sidewalls and Bottoms For BTEX

1.0 Purpose

This procedure outlines the methods to be employed when obtaining final composite soil samples for BTEX analysis.

2.0 Scope

This procedure is to be used when collecting soil samples intended for ultimate transfer to a testing laboratory for BTEX analysis. This procedure is to be used only when the PID field-test results for OVM exceeds 100 ppm.

3.0 Preliminary

3.1 Obtain sterile, clear, 2 oz. glass containers with Teflon lid from a laboratory supply company or the testing laboratory designated to conduct analyses of the soil.

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.

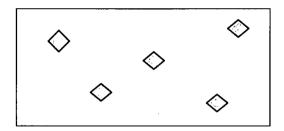
5.0 Sampling Procedure

- 5.1.Do not touch the soil with your bare hands. Use new nitrile gloves to help minimize any cross-contamination.
- 5.2.If safe and within OSHA regulations, go to the sampling point with the sample container. If not analyzing for ions or metals, use a trowel to

obtain the soil. If the excavation is deeper than 6' BGS, do not enter the pit, but use a backhoe to assist in procurement of the sample. (If a backhoe is used, the backhoe will obtain an amount of soil from each composite point; bring the purchase to the surface staging area where a sample-portion of soil will be extracted from the backhoe purchase. The remainder of the backhoe purchase will be staged on the surface with other staged soils.)

5.3. Sidewall Samples

5.3.1 On each sidewall, procure a 2oz sample from each of five distinct points on the sidewall with distinct points resembling the "W" pattern:



- 5.4.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. Repeat for each sampling point.
- 5.5.Place the samples directly on ice for transport to the laboratory if required.
- 5.6. 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. Project and sample name.
 - b. Signed copy of the original Chain of Custody Form including 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

Procedure for Plugging & Abandonment of Cased Water Monitoring Wells

1.0 Purpose

This procedure outlines the methods to be employed to plug and abandon cased monitoring wells.

2.0 Scope

This procedure shall be used for developed, cased water monitoring wells located in the State of New Mexico

3.0 Preliminary

3.1 No well may be drilled, modified or plugged without NMOCD approval. Additional approvals may be required if the well is situated in a sensitive area, within municipal jurisdictions or on federal or tribal lands.

4.0 Plugging

- 4.1 Each bore will be filled with a 1% 3% bentonite/concrete slurry to three feet bgs. The remaining three feet will be capped with concrete only.
- 4.2 All wellheads will be removed to below ground surface.

5.0 Records

- 5.1 The company plugging the well shall prepare a report on their company letter head listing the site name and describing general well construction including total depth of the well, the diameter of casing, material used to plug the well (e.g. bentonite/cement slurry), and date of the plugging operation.
- 5.2 It is recommended but not required that photographs of the final surface restoration be taken and included within the records.
- 5.3 Copies of the plugging report shall be submitted to all appropriate agencies and retained by the well operator for a minimum period of ten years.