1R- 427-172

## REPORTS



11-4-08



## RECEIVED

Infrastructure, buildings, environment, communications

Mr. Edward J. Hansen New Mexico Oil Conservation Division 1220 So. Saint Francis Drive Santa Fe, New Mexico 87505

Certified Mail Receipt No. 7002 2410 0001 5812 9961

Subject: Additional Site Investigation Results NMOCD Case # 1R427-172 Eunice Monument Eumont (EME) SWD Gaither Boot T19S, R36E, Section 34, Unit I, Eunice, Lea County, New Mexico

Dear Mr. Hansen,

As requested in your September 4, 2008 email approval of the Additional Site Investigation Work Plan dated August 20, 2008 I am respectfully submitting the additional investigation results on behalf of Rice Operating Company (ROC).

An upgradient monitor well was drilled on October 6, 2008 approximately 30 feet northwest of the former junction box location. The purpose of drilling this well was to identify if upgradient chloride impacts are present. Elevated chloride concentrations have been reported in this area since the 1950's.

Groundwater samples were collected from the upgradient well (MW-2) and the well located at the former junction box location (MW-1) on October 20, 2008. Analytical results are attached. The water quality of upgradient well and the site well are similar. Chloride concentrations are 3,500 milligrams per liter (mg/L) in groundwater samples collected from MW-1 and 2,000 mg/L in groundwater samples collected from MW-2. Total Dissolved Solids are 6,890 mg/L in groundwater samples collected from MW-1 and 4,440 mg/L in groundwater samples collected from MW-2.

As approved by NMOCD, if the background quality of the upgradient monitor well is similar to the downgradient well analytical results, a chloride mass removal work plan will be submitted to NMOCD. As this is the case, ROC will submit a work plan that includes an estimation of chloride mass that may have impacted this site and a plan for the removal of the estimated chloride mass. The method of treatment or disposal will be included in the work plan.

ARCADIS U.S., Inc. 1004 N. Big Spring Street Suite 300 Midland Texas 79701 Tel 432.687.5400 Fax 432.687.5401 www.arcadis-us.com

Date: 4 November 2008

Contact: Sharon Hall

Phone: 432 687-5400

Email: shall@arcadis-us.com

## ARCADIS

Ed Hansen November 4, 2008

ROC is the service provider (agent) for the EME Salt Water Disposal System and has no ownership of any portion of the pipelines, wells or facilities. The EME System is owned by a consortium of oil producers, System Partners, who provide all operating capital on a percentage ownership/usage basis. Environmental remediation projects of this magnitude require System Partner AFE approval and work begins as funds are received.

If you have any questions or concerns regarding this please do not hesitate to contact Hack Conder or me.

Best Regards,

ARCADIS U.S, Inc.

Shan E. Hall

Sharon E. Hall Associate Vice President

Copies: Hack Conder- Rice Operating Company



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

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

Receiving Date: 10/21/08..., A Reporting Date: 10/24/08 Project Number: NOT GIVEN Project Name: EME GAITHER BOOT Project Location: T19S-R36E-SEC34 I ~ LEA CO., NM

. . . . .

Sampling Date: 10/20/08 Sample Type: WATER Sample Condition: COOL & INTACT Sample Received By: ML Analyzed By: TR

	Na	Ca	Mg	к	Conductivity	T-Alkalinity
LAB NUMBE SAMPLE ID	(mg/L)	(mg/L)	(mg/L)	(mg/L)	( <i>u</i> S/cm)	(mgCaCO <sub>3</sub> /L)
ANALYSIS DATE:	10/23/08	10/23/08	10/23/08	10/23/08	10/22/08	10/22/08
H16150-1 MONITOR WELL #1	1,620	521	136	15.8	9,500	164
H16150-2 MONITOR WELL #2	629	465	156	13.5	5,990	156
	ND	40.4	40.0	0.00	4 444	
Quality Control	NK	48.1	48.0	2.92	1,414	
True Value QC	NR	50.0	50.0	3.00	1,413	NR
% Recovery	NR	96.2	97.2	97.3	100	NR
Relative Percent Difference	NR	<0.1	4.8	<0.1	0.1	NR
METHODS:	SM3	3500-Ca-D	3500-Mg E	8049	120.1	310.1

	CI	SO4	CO₃	HCO₃	pН	TDS
	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(s.u.)	(mg/L)
ANALYSIS DATE:	10/23/08	10/23/08	10/22/08	10/22/08	10/22/08	10/22/08
H16150-1 MONITOR WELL #1	3,500	293	0	200	7.01	6,890
H16150-2 MONITOR WELL #2	2,000	207	0	190	7.12	4,440
· ··· · · · · · · · · · · · · · · · ·						
Quality Control	500	43.3	NR	988	7.04	NR
True Value QC	500	40.0	NR	1000	7.00	NR
% Recovery	100	108	NR	98.8	101	NR
Relative Percent Difference	2.0	2.5	NR	<0.1	0.3	NR
METHODS:	SM4500-CI-B	375.4	310.1	310.1	150.1	160.1

Chemis

10-27-08 Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims investment of the amount paid by client for analyses, and any other cause whatsoever shall be deemed walved unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In the event shift Cardinal be lisble for indental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates 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 above-stated reasons or otherwise. Results rolate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



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

Receiving Date: 10/21/08 Reporting Date: 10/24/08 Project Number: NOT GIVEN Project Name: EME GAITHER BOOT Project Location: T19S-R36E-SEC34 I ~ LEA CO., NM Sampling Date: 10/20/08 Sample Type: WATER Sample Condition: COOL & INTACT Sample Received By: ML Analyzed By: ZL

		BENZENE	TOLUENE	ETHYL BENZENE	TOTAL XYLENES
LAB NUMBER	SAMPLE ID	(mg/L)	(mg/L)	(mg/L)	(mg/L)
ANALYSIS DA	TE	BENZENE (mg/L) TOLUENE (mg/L) BENZEN BENZEN (mg/L)   10/23/08 10/23/08 10/23/08   /ELL #1 <0.001	10/23/08	10/23/08	
H16150-1	MONITOR WELL #1	<0.001	<0.001	<0.001	< 0.003
H16150-2	MONITOR WELL #2	<0.001	<0.001	<0.001	<0.003
			· · · · · · · · · · · · · · · · · · ·		
Quality Contro		0.052	0.050	0.050	0.159
True Value QC	nan man ann an ann an ann an Anna ann an Anna an Anna ann an Anna ann ann	0.050	0.050	0.050	0.150
% Recovery		104	100	100	106
<b>Relative Perce</b>	nt Difference	9.5	10.3	8.2	6.5

METHOD: EPA SW-846 8021B

TEXAS NELAP CERTIFICATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE, AND TOTAL XYLENES.

Kene Chemist

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including user bottom species and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinat within thirty (30) days after completion of the applicable service. 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 arising out or related to the performance of services hereunder 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 written approval of Cardinal Laboratories.

Delivered By: Bampler -	Relinquished by	Bozanne Bing	Relinquisher by:						-2-	H/6/50-1	LAB #	T19S-R36E	Piojeci #:	(575) 393-9	122 W Taylor St Phone #:	Address: (St	Hack Cond	Project Manager.	Company Name: RICE Opera	Tel (575) 39; Fax (575) 39	101 East Marland - Mexico 88
(Circle One) UPS - Bus - Other:	Date: Time:	S. h antipoli - 2	Date: Time:	J					Monitor Well #2	Monitor Well #1	FIELD CODE	-Sec34 I ~ Lea County - New	EME Gaither Boot	174	reet ~ Hobbs, New Mexico 88240	reet, City, Zip)	er		ating Company	-2326 CAIU	Hobbs, New Card
Sample	Receiv	6	Receiv						G	G	(G)rab or (C)omp	Mexico		(575)	Fax #:						
Yes No	ved By	67	ied by			T			 з	3	# CONTAINERS			397-	(5/c)	Ì	122 V				
	r T	$\int f$		Η	-	+	-		 ×	×	WATER	$\sim$		147	39	; ) )	Tayl		0 7 0	à	٥
N Y	abor	$\mathbb{R}$	$\overline{)}$								SOIL	R sa	$\mathbf{N}$		3-9	Pho	or Str	Add			5
	atory	R)	$\mathcal{D}$								AIR 😪		$\left( \right)$		114	ne#:	eet -	ress:	iting in the second		
	Sta	R-	A								SLUDGE						Б.		ດີ	2	5
	. H	Æ	<u> </u>		 _								Γ				ġ.,		ă ·		
(Initia			-		 				 2	2	HCL (2 40ml VOA)		$\mathbf{N}$				lew N		an		
	Dat	K	Dat		 				 			SZO.	K~				Nexio	~	`		uí∙ D
A BY	W	6	e:		 	<b></b>			 			inne J					o 88	tree		Ŭ	2
	-	<b>m</b>	T		 +-	+		$\vdash$	 	-		ohns Q			G	11	240	C g	R		
R	me	5	ime:		 +-	+			 		NONE	on (S			) j	ļ.		7. Zip	Ħ		5
$\langle \rangle$		. 25							10-20	10-20	DATE (2008)	75)631- met.c			39/-1	2 2 1		Ĭ		5	2
		Ϋ́,							11:3	is is	TIME	9310 OM			4/1	i					
	RE	Fax	Pho								MTBE 8021B/602										Γ
	Em:	Res	ne F						×	Х	BTEX 80218/602							-			
	all R	ülts	Resu								TPH 418.1/TX1005 / TX1	005 Ext	ended	(C35)				-			0
	esu		lts		_	ļ			 		PAH 8270C							-	İ		<b>H</b>
	ts to				 				 		Total Metals Ag As Ba Co	Cr Pb S	se Hg Se Ha	6010	3/200	./		•		5	Z
		Ύe	Ye								TCLP Volatiles							<u>_</u>	A	Q	Ĭ
		Ľ.	°	$\square$					 		TCLP Semi Volatiles			-					NA	der I	lõ
anr	Mde	<b></b>	Ļ	$\vdash$	 	<b> </b>			 		TCLP Pesticides							∙st St	LYS	D #	13
eim 1e@	era	đ	б		 				 		RCI								Sis		١Ž
)val	nic	<b>_</b>		$\left  - \right $	 	<b> </b>	$\left  - \right $		 		GC/MS Vol. 8260B/624							ې ۲	RE		≥
orn	WS	ddit		$\vdash$	 +-	╂──		$\vdash$	 		BCB's Semi. Vol. 8270C	/025						. tho	20		D
et.c	d.c	ional		$\vdash$	 +	+			 		Posticidas 2001 A/200							· No	EST		Ź
om vd.c	mo	Fax		$\vdash$	 +-	-	$\vdash$				BOD TSS off							÷	-		١Ę
l ğ		Z		┝─┤	 +	1	$\vdash$		 		Moisture Content							•			SIS
1 3		mbe							 									•			ᇛ
E									×	×	Cations (Ca, Mg, Na, K)										ا ق
E			-			4		1 1	<b>U</b>	-	Anione (CL SOA CO3 H	CO31									
E					 				 	$\hat{}$		005)		···							ĒS
E					 				 ×	×	Total Dissolved Solids							-			EST
E	į								×	×	Total Dissolved Solids Chlorides							- 4			EST

Page <u>c</u>

<u>\_\_</u>