## 1R - 426 - 108

### REPORTS

### DATE:

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Infrastructure, buildings, environment, communications []) ()())

2010 FEB -8 P 1:29

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

Certified Mail Receipt No. 7002 2410 0001 5813 3852

Subject: Investigation and Characterization Plan Report and Termination Request OCD Case #1R426-108 Blinebry Drinkard (BD) Jct. F-25-1 T21S, R37E, Section 25, Unit F, Eunice, Lea County, New Mexico

Dear Mr. Hansen,

RICE Operating Company (ROC) has retained ARCADIS U.S, Inc. (ARCADIS) to address potential environmental concerns at the above-referenced site. ROC is the service provider (agent) for the Blinebry Drinkard (BD) 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.

On behalf of ROC, ARCADIS respectfully submits this Investigation and Characterization Plan (ICP) Report and Termination Request for the above-referenced site.

### SITE HISTORY AND BACKGROUND

The site is located near the town of Eunice, Lea County, New Mexico. The expected depth to groundwater at this site is approximately 65 feet below ground surface (bgs).

The junction box F-25-1 was eliminated and replaced with poly piping that bypasses this junction. Initial delineation began on June 23, 2004 and was completed on February 23, 2005 by trenching with a backhoe to 12 feet bgs. An area 30 feet x 30 feet x 12 feet-deep was excavated and backfilled with blended soils to a depth 6 feet bgs. A compacted clay barrier was installed to inhibit downward chloride migration. The excavated area was then backfilled with the remaining blended excavation soil. The disturbed surface was seeded with a blend of native vegetation and monitored for growth. An identification plate was placed on the surface in the location of the former junction box for future environmental consideration and to identify the presence of the clay barrier.

During the excavation, soil samples were analyzed in the field for chlorides using fieldadapted Method 4500-Cl-B and screened in the field using a photoionization detector (PID). Confirmation samples were collected from the bottom, side walls (four wall composite 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: February 4, 2010

Contact: Sharon Hall

Phone: 432 687-5400

Email: shall@arcadis-us.com

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Ed Hansen February 4, 2010

sample), and remediated backfill and sent to Environmental Lab of Texas for Total Petroleum Hydrocarbons (TPH) and Chloride analysis. PID readings were all low and laboratory analysis confirmed gasoline range organics (GRO) and diesel range organics (DRO) were not detected.

Based on the results of the soil sampling analytical results, elevated chloride concentrations are present at the subject site.

ROC disclosed potential groundwater impact at the site to New Mexico Oil Conservation Division (NMOCD) in an e-mail dated March 9, 2005. A disclosure report was submitted to NMOCD with all of the ROC 2004 Junction Box Reports in March 2005 per the ROC Junction Box Upgrade Workplan. The source of this impact is historical; there is no longer a threat of compounded conditions at this site because the junction has been eliminated and replaced with poly piping that bypasses this junction.

On behalf of ROC, ARCADIS submitted an ICP to NMOCD on July 17, 2007 and subsequently approved by NMOCD on August 8, 2007. The plan proposed three tasks:

### Task 1- Collect Regional Hydrogeologic Data

A one-half mile water well inventory that includes a review of water well records listed on the New Mexico State Engineer Office and United States Geological Survey (USGS) websites and windmills indicated on applicable USGS topographic maps.

### Task 2- Evaluate Concentrations of Constituents of Concern in Soil and Groundwater

Installation of one soil boring at the former junction box location in order to delineate the depth of impacted soil. Additional soil borings were proposed to evaluate soil impacts. One soil boring was proposed in each direction from the former junction box location (north, south, east and west of the excavated area) in order to delineate the lateral extent of impacted soil. It was proposed that if chloride and/or hydrocarbon concentrations do not decline sufficiently with depth or exceed 250 milligrams per kilogram (mg/kg) or PID readings of 100 within 10 feet of the suspected groundwater depth, one soil boring would be converted to a monitor well. The monitoring well would be placed near-source to observe soil impacts.

### Task 3- Evaluate Potential Flux from the Vadose Zone to Ground Water

As proposed in the ICP, the information gathered from tasks 1 and 2 would be evaluated and utilized to design a groundwater remedy if needed. The groundwater remedy that offers the greatest environmental benefit while causing the least environmental impairment would be selected. If the evaluation demonstrates that residual constituents pose no threat to groundwater quality, only a surface restoration plan protective of groundwater would be

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proposed. Such recommendations and findings would be presented to NMOCD in a subsequent Corrective Action Plan (CAP).

Based on the results of the water well inventory and discussions with the landowner, it came to our attention that groundwater may not be present at the site. Following a call between Edward Hansen (NMOCD) and Sharon Hall (ARCADIS), ARCADIS submitted a request via email on August 7, 2008 to drill one soil boring at the site to a depth of 75 feet bgs, ten feet below the average water depth in Section 23. Attached to the request was a State Engineer's Report for Township 21S Range 37E, Sections 23, 24, 25, 26, 35 and 36. Of 29 wells drilled in these sections only two wells reported groundwater. Both wells were located in Section 23 and the average depth to groundwater is 65 feet bgs.

NMOCD conditionally approved the request on September 25, 2008 providing that the boring be drilled to a depth of 85 feet bgs and the boring remain open for at least 48 hours following completion.

### **BORING RESULTS**

On October 7, 2008 a boring was drilled at the site five feet east of the former junction box location (Figure 1). The boring was drilled to a depth of 25 feet bgs where moist soils were encountered. Soil samples were collected at depths of 15, 20 and 25 feet bgs and analyzed for field chloride results using field-adapted Method 4500-Cl-B. Chloride concentrations were 143, 178 and 305 mg/kg, respectively. The sample collected from a depth of 25 feet bgs was submitted for laboratory analysis for chlorides. The laboratory analytical result for this sample was 112 mg/kg.

Because State Engineer records and discussions with the landowner indicated that groundwater was not likely present at the site, yet moist soil was encountered in the soil boring, two additional soil borings were drilled at the site on September 22, 2009. One soil boring was drilled upgradient, and one near-source boring, downgradient of the former junction box location (based on regional gradient). The boring locations are shown on Figure 1. Each of the borings was drilled to a depth of 53 feet bgs and logged to a depth of 50 feet bgs. (Boring logs attached.) Soil samples were collected at five-foot intervals, screened in the field using a PID, and analyzed for field chloride results using field-adapted Method 4500-Cl-B. PID and field chloride results are shown on the attached table and boring logs. Two soil samples from each of the borings were submitted for laboratory analysis for chlorides. The results, as shown on the attached table and boring logs are as follows:

SB #2	25 feet bgs	Chlorides 208 mg/kg
SB #2	45 feet bgs	Chlorides 16 mg/kg
SB #3	20 feet bgs	Chlorides 1120 mg/kg
SB #3	45 feet bgs	Chlorides 32 mg/kg

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Ed Hansen February 4, 2010

ROC was not able to obtain landowner permission to install a monitoring well at this site. Therefore, a groundwater sample was collected from each of the soil borings at a depth of 53 feet bgs and submitted for laboratory analysis for chlorides and total dissolved solids (TDS). The chloride concentration in the sample collected from SB #2 was 176 milligrams per liter (mg/L) and from SB #3 was 184 mg/L. The TDS concentration in the sample collected from SB #2 was 624 mg/L and from SB #3 was 661 mg/L.

### RECOMMENDATIONS

Chloride concentrations in excess of 250 milligrams per liter (mg/L) were not detected in groundwater samples collected from the two soil borings drilled to groundwater. The maximum chloride concentration in the groundwater samples was 184 mg/L. This sample was collected from the near-source boring (SB #3).

The maximum chloride concentration in soil samples analyzed from soil samples collected from SB #1 and SB #2 was 317 mg/kg. The maximum chloride concentration in soil samples collected and analyzed from the near-source boring SB #3 was 1,184 mg/kg at a depth of 20 feet bgs. Chloride concentrations in soil boring SB #3 declined with depth to 220 mg/kg at 50 feet bgs based on field titrations and 32 mg/kg at 45 feet bgs based on laboratory analysis. Further, a compacted clay barrier has been installed at the site to inhibit downward chloride migration.

Based on the fact that chloride concentrations in excess of 250 mg/L were not detected in groundwater samples, chloride concentrations in soil are either not elevated or decline with depth and a clay liner has been installed at this site, we request termination of this site. Your approval for termination will be appreciated.

Very Truly Yours,

ARCADIS U.S., Inc.

Shan E. Hall

Sharon E. Hall Associate Vice President

Copies: Hack Conder- Rice Operating Company

Attachments: Chloride and PID Results Table Figure 1- Boring Locations Boring Logs Analytical Results Groundwater Analytical Results Table

Sample ID	Field Chloride Result	Lab Chloride Result	PID
	mg/kg	mg/kg	
SB 1 15'	143	NA	NA
SB 1 20'	178	NA	NA
SB 1 25'	305	112	NA
SB 2 5'	212	NA	2.5
SB 2 10'	167	NA	1.5
SB 2 15'	201	NA	0.5
SB 2 20'	208	NA	0.1
SB 2 25'	317	208	0.2
SB 2 30'	279	NA	0.1
SB 2 35'	225	NA	0
SB 2 40'	245	NA	0.2
SB 2 45'	195	16	0
SB 2 50'	232	NA	0
SB 3 5'	213	NA	2.1
SB 3 10'	506	NA	0.1
SB 3 15'	1058	NA	0.1
SB 3 20'	1184	1120	0
SB 3 25'	549	NA	0
SB 3 30'	378	NA	0.1
SB 3 35'	285	NA	0
SB 3 40'	303	NA	0
SB 3 45'	259	32	0
SB 3 50'	220	NA	0

### BD Jct. F-25-1 SOIL CHLORIDE AND PID RESULTS

mg/kg= milligrams per kilogram

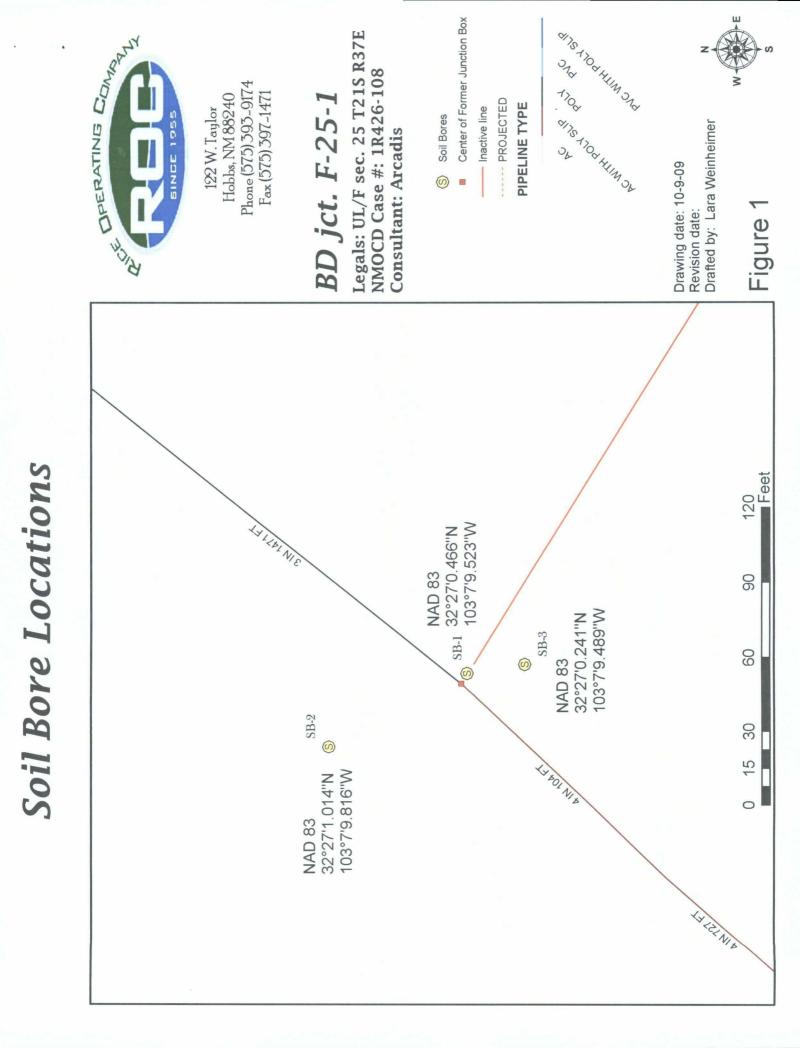
NA= Not Analyzed

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### **GROUNDWATER LABORATORY ANALYTICAL RESULTS**

Sample ID	Chloride Result mg/L	TDS Result mg/L
SB 2	176	624
SB 3	184	661

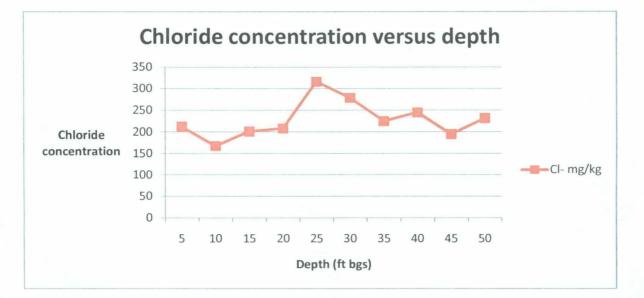
mg/L= milligrams per liter



Logger		Lara Weinheimer	Client:		Well ID:
Driller		Harrison & Cooper, Inc. Drilling	RICE Operating (	Company	
Drilling Method:		Air rotary	Project Name:		
Start Date:		10-7-08	BD jct. F-2	5-1	
End Date:		10-7-08	Location:		SB - 1
Comments:			BD SWD Sy	stem	00-1
Located	5 ft eas	st of the former jct. box site	DD OWD Oy	3(6)11	
			unit 'F' Sec.25 T2	1S, R37E	
TD = 25 f		GW = 55 ft	Lea County	, NM	
Depth chloride (feet) field tests	PID	Description	Lithology		oil Bore struction
15 143 20 178 25 305 Lab 112		15 - 25 ' VERY FINE TO FINE SAND rocky, some caliche, orangey-brown, dry			bentonite seal

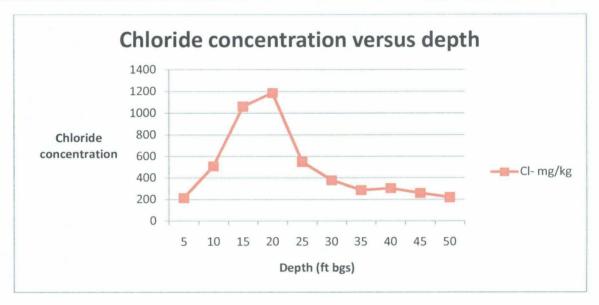
	Logger: Driller: Consultant: ing Method: Start Date:	1	Harr	Hack Conder rison & Cooper, Inc. Drilling Arcadis Air rotary 9/22/2009	ALLE REELES
Comm	End Date:		(	9/22/2009	Project Name: Well ID:
Comm	ents: All sa TD = 50	Draft		ara Weinheimer DGW = 53 ft	BD jct. F-25-1     SB #2       Location:     UL/F sec. 25 T21S R37E       Lat:     N103°27'1.014"     County: Lea       Long:     W103°7'9.816"     State: NM
Depth (feet)	chloride field tests	LAB	PID	Description	Lithology Well Construction
5	212		2.5		
10	167		1.5		
15	201		0.5	0 - 50 ft VERY FINE TO FINE SAND	
20	208		0.1	rocky, some caliche, orangey-brown, dry	
25	317	CI- 208	0.2		
30	279		0.1		bentonite seal
35	225		0		
40	245		0.2		
				Page 1 of 4	

45	195	Cl- 16	0
50	232		0
		CI-	TDS
	Water	176	624



	Logger: Driller: Consultant: ing Method: Start Date:		Harr	Hack Conder rison & Cooper, Inc. Drilling Arcadis Air rotary 9/22/2009		QALE REF		Barra
	End Date:			9/22/2009	Pr	oject Name:		ell ID:
Comm	ents: All sa	imples t	from cu	ttings	]	BD jct. F-2		SB #3
	TD = 50			ara <b>W</b> einheimer DGW = 53 ft	La	cation: U t: N32°27'0.24 ng: W103°7'9		ounty: Lea
Depth (feet)	chloride field tests	LAB	PID	Description		Lithology	Well Co	nstruction
						•		
5	213		2.1			•		
10	506		0.1					
				0 - 50 ft		•		
15	1058		0.1	VERY FINE TO FINE SAND				
20	1184	Cl- 1120	0	rooky, some callone, orangey brown, dry				
						•		
25	549		0			•		bentonite
30	378		0.1			•		seal
35	285		0			•		
40	303		0					

				•	
45	259	Cl- 32	0		
-10	200	0. 02			
				•	
50	220		0	•	
	Water	CI- 184	TDS 661	•	





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

Receiving Date: 10/15/08 Reporting Date: 10/16/08 Project Number: NOT GIVEN Project Name: BD JCT, F-25-1 Project Location: BD JCT, F-25-1 Analysis Date: 10/16/08 Sampling Date: 10/07/08 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: ML Analyzed By: TR

SB #1 @ 25'	112
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Difference	< 0.1

Note: Analysis performed on a 1:4 w:v aqueous extract.

Chemist

10-17-08 Date

### H16123 RICE

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## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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Company Name:	: Rice Operating Company	mpany			BILL TO		ANA	ANALYSIS	REQUEST	
Project Manage	Project Manager: Hack Conder			P.O.#:						
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city: Hobbs		State: NM	Zip: 88240	Attn:	ayyaa gayaanay aanaa yaanaa gaaraa ka					
Phone #: 393-9174	)174	Fax #: 397-1471	471	Address:				••••••		
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Project Name: BD jct. F-25-1	3D jct. F-25-1			State:	Zip:	sə				
Project Location	Project Location: BD jct. F-25-1			Phone #:		rid				
Sampler Name:	2	Tony Grieco		Fax #:		ομ				
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Lab I.D.	Sample I.D.	Ö	(G)RAB OR (C)OMP # CONTAINERS GROUNDWATER MASTEWATER SOIL CIL	SLUDGE STHER : ACID/RASE: CE / COOL	стинек : Вд П	Ĩ				
11/6/23-1	SB #1 @ 25'	a de la companya de l				10:62				
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ANALYTICAL RESULTS FOR RICE OPERATING COMPANY ATTN: DARNELL MITCHELL 122 WEST TAYLOR HOBBS, NM 88240 FAX TO: (575) 397-1471

Receiving Date: 09/29/09 Reporting Date: 09/30/09 Project Number: NOT GIVEN Project Name: SB #2 @ 25 & 45 FT. SB #3 @ 20 & 45 FT. Project Location: B.D. F-25-1

LAB NO.

SAMPLE ID

Analysis Date: 09/30/09 Sampling Date: 09/22/09 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: ML Analyzed By: HM

CI<sup>-</sup> (mg/kg)

H18368-1	SB #2 @ 25 FT.	208
H18368-2	SB #2 @ 45 FT.	16
H18368-3	SB #3 @ 20 FT.	1,120
H18368-4	SB #3 @ 45 FT.	32
Quality Contro		500
True Value Q	C	500
% Recovery		100
Dolativo Doro	ent Difference	< 0.1

METHOD: Standard Methods 4500-CI'B Note: Analyses performed on 1:4 w:v aqueous extracts.

Heea Chemist

10/01/09

Date

### H18368 RICE

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# CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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city: 1+0 0	005 State: N M Zip: 83340	Attn:	
Phone #: 373	-C/174 Fax#:	Address:	
Project#:	Project Owner:	City:	
Project Name: $SBH$	3 Q 35 + 45 FT. 56 #3	∂0445 State: Zip:	
Project Location:	m: 15.0 135~1	Phone #:	
Sampler Name:		Fax #:	
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† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476



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

Receiving Date: 09/25/09 Reporting Date: 09/27/09 Project Number: NOT GIVEN Project Name: BD F-25-1 Project Location: NOT GIVEN

Sampling Date: 09/25/09 Sample Type: WATER Sample Condition: INTACT Sample Received By: AB Analyzed By: HM

LAB NO.	SAMPLE ID	CI (mg/L)	TDS (mg/L)
Analysis Date		09/26/09	09/26/09
H18342-1	SOIL BORE #2 WATER SAMPLE @ 53'	176	624
H18342-2	SOIL BORE #3 WATER SAMPLE @ 53'	184	661
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Quality Contro		500	NR
True Value Q0		500	NR
% Recovery		100	NR
Relative Perce	ent Difference	< 0.1	< 0.1
METHOD: Stand	lard Methods, EPA	4500-CI'B	160.1

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Date

H18342 RICE

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