1R -

REPORTS

DATE:



Investigation and Characterization Report and Termination Request Rice Operating Company – EME SWD System O-19 Jct UL O Sec 19 T 20S R 37E NMOCD Case Number: 1R427-06



July 27th, 2009 (updated from April 7th, 2009 report)

Prepared by:

L. Peter Galusky, Jr. Ph.D. Texerra 505 N. Big Spring, Suite 404 Midland, Texas 79701 Web: www.texerra.com E-mail: lpg@texerra.com

Investigation and Characterization Report and Termination Request

O-19 Jct UL O Sec 19 T 20S R 37E NMOCD Case Number: 1R427-06

Executive Summary

This report summarizes the findings of investigative work prescribed in the NMOCD approved Investigation and Characterization Plan for this site. Updates contained in this report from the original of 04-07-09 include the following: 1- The soil area affected the former junction box was better defined and quantified; 2- The residual soil chloride mass contributed by the former junction box was calculated as the difference between the average soil chloride concentration within the affected area and a presumed natural background concentration of 100 ppm; 3- The mixing zone depth in the groundwater chloride model was reduced from 15 ft to 10 ft; 4 – The porosity of the aquifer used in the model was reduced from 0.33 to 0.30.

Rice Operating Company removed a junction box at this location in March of 2003 as part of its facility maintenance and upgrade program. The wood junction box was removed and soils were sampled using a backhoe, creating a 10 by 10 by 12 ft deep excavation. A one foot thick compacted elay barrier was installed at the bottom of the excavation which was backfilled with the excavated soil to ground level. The disturbed surface was then seeded with a native vegetation mix. Preliminary site investigation associated with the junction box replacement found elevated soil chloride and petroleum hydrocarbon concentrations.

The field investigation was completed on September 9th, 2008. Seven soil borings were advanced near and around the location of the former junction box to depths of 20 ft bgs where the water table capillary fringe was encountered. Soil chloride concentrations averaged 300 ppm throughout the depth of drilling among all soil bores. Soil petroleum hydrocarbons were insignificant. The ground surface surrounding the former junction box has become restored to natural prairie grasses and associated vegetation.

A simple soil chloride transport and groundwater dilution model was developed to estimate the potential effect of residual soil chloride leaching into groundwater. The model predicted that maximum anticipated elevation of groundwater chlorides caused by the movement of residual soil chlorides from the former junction box is less than 150 ppm, indicating that residual soil chlorides should not represent a hazard to groundwater quality.

Given that there are no apparent risks of groundwater contamination from this former junction box and that surface/ecological impacts are negligible, it is therefore requested that NMOCD grant Rice Operating Company a "remediation termination" or similar closure status for this project.

Investigation and Characterization Report and Termination Request

O-19 Jct

UL O Sec 19 T 20S R 37E NMOCD Case Number: 1R427-06

Contents

ii
iii
1
1
4
11
12 13 20 22

Figures

Figure 1 - Location map, USGS topo base	2
Figure 2 - Location map, Google aerial view	3
Figure 3 – Soil bore location map	5
Figure 4 - Soil chloride and petroleum hydrocarbon concentrations	6
Figure 5 - Estimation of residual soil chloride mass	7
Figure 6 - Schematic diagram of soil chloride – groundwater dilution model	8
Figure 7- Model equations and parameter values	9
Figure 8 - Model predictions	10

Background

This report summarizes the findings of investigative work prescribed in the Investigation and Characterization Plan (ICP) for this site, which was approved by NMOCD on July 17th, 2008 (a copy of e-mail approval is given in the Appendix). Updates contained in this report from the original of 04-07-09 include the following: 1- The soil area affected by the former junction box was better defined and quantified; 2- The residual soil chloride mass contributed by the former junction box was calculated as the difference between the average soil chloride concentration within the affected area and a presumed natural background concentration of 100 ppm; 3- The mixing zone depth in the groundwater chloride model was reduced from 15 ft to 10 ft; 4 – The porosity of the aquifer used in the model was reduced from 0.33 to 0.30.

The site is located approximately five miles south/southwest of Monument, New Mexico (Figures 1&2). The topography is gently sloping toward the southeast. Soils on the site are characterized in the Lea County Soil Survey as deep and sandy. NM OSE records indicate that groundwater is likely to be encountered at a depth of 23+/- feet in unconsolidated Tertiary alluvium of the Ogallala Formation.

Rice Operating Company removed this junction box in March of 2003 as part of its facility maintenance and upgrade program. The wood junction box was removed and soils were sampled using a backhoe, creating a 10 by 10 by 12 ft deep excavation. A one foot thick compacted clay barrier was installed at the bottom of the excavation which was backfilled with the excavated soil to ground level. The disturbed surface was then seeded with a native vegetation mix

Significant concentrations (approx. 2,000 +/- ppm) of diesel range organics (DRO) were encountered in the excavated soil with a lower concentration found (334 ppm) at 12 ft below ground surface (bgs). Chloride concentrations increased with depth to a value of 1,150 ppm at 12 ft bgs. Petroleum hydrocarbons and chlorides thus represent the constituents of concern. The surface (ecological) impact of this release was relatively small.

Objective, Scope and Methodology

The <u>objective</u> of the ICP is to: **a**- quantify the magnitude and extent of residual soil chlorides and petroleum hydrocarbons; **b**- determine if these pose a threat to groundwater quality under present conditions and **c**- develop a Corrective Action Plan (CAP) to protect groundwater if this is warranted.

The <u>scope</u> of the ICP encompasses the measured effects of past operations of the facility on soil and groundwater in the affected vicinity.

The <u>methodology</u> of the ICP entailed: **a**- drilling to obtain subsurface soil samples; **b**- analyzing these for chlorides using field titration procedures and for petroleum hydrocarbons using a Photo-ionization Detector (PID); **c**- verifying (QA/QC) the field methods against a subset of samples analyzed by a commercial laboratory; **d**- analyzing the data using graphical and statistical methods and **e**- interpreting the data using a simple mass-balance dilution model.

The field investigation was completed on September 9th, 2008. Harrison and Cooper, Inc. provided drilling services and Rice Operating Company personnel performed field chloride titrations and PID analyses. L. Peter Galusky, Jr. of Texerra supervised field activities. Confirmatory laboratory analyses were subsequently performed by Cardinal Laboratories.



Figure 1 – EME O-19 Jct location map on USGS topo base.



Results and Discussion

Seven soil borings were advanced near and around the location of the former junction box to depths of 20 ft bgs where the water table capillary fringe was encountered (Figure 3). The average soil chloride concentration from the sample points within the affected area is 367 ppm. It assumed that the natural background depth-averaged soil chloride concentration is 100 ppm We thus calculate the increase in depth-averaged residual soil chlorides from the former junction box to be 267 ppm (367 ppm – 100 ppm; Figures 3 & 4). The total mass of residual soil chlorides believed to be contributed by the former junction box was estimated to be 1,258 lbs (Figure 5). Soil petroleum hydrocarbons were insignificant (below 1.0 ppm by PID and below laboratory detection; Appendices B & C).

In order to determine if the residual soil chlorides represent a potential hazard to down gradient groundwater, a simple soil chloride transport and groundwater dilution model (Figures 6 & 7) was developed to estimate the potential effects on groundwater quality given the following assumptions:

- 1. The center of mass of residual chlorides moves downward at a rate of 2.0 ft/yr.
- 2. It is assumed that these chlorides mix uniformly within an elliptical groundwater plume of dimensions 250 ft maximum length by 100 ft maximum width through a depth of 10 ft of the water table aquifer.
- 3. Natural dilution of the plume occurs at a rate of 10% per year.

The model predicted that maximum anticipated elevation of groundwater chlorides caused by the movement of residual soil chlorides is under 150 ppm (Figure 8), indicating that residual soil chlorides should not represent a hazard to groundwater quality.

The ground surface surrounding the former junction box has become restored to natural prairie grasses and associated vegetation (See cover photo and Appendix D).

Given that there are no apparent risks of groundwater contamination from this former junction box and that surface/ecological impacts are negligible, it is therefore requested that NMOCD grant Rice Operating Company a "remediation termination" or similar closure status for this project.

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



Figure 3 – Locations of soil bores relative to former junction box. The average field-measured, depth-averaged soil chloride concentrations are given for depths 0 to 20 ft bgs (at the water table capillary fringe). The dashed, red ellipse approximates the area (of 2,120 sq ft) encompassing average soil chloride concentrations greater than 250 ppm. The average soil chloride concentration from the sample points within this affected area is 367 ppm. It assumed that the natural background depth-averaged soil chloride concentration is 100 ppm.. We thus calculate the increase in depth-averaged residual soil chlorides due to the former junction box to be 267 ppm (367 ppm – 100 ppm).

5



Figure 4 – Average soil chloride and petroleum hydrocarbon concentrations from five soil borings taken at/near the former junction box location within the affected area.

Soil Chloride Calculator Estimates Mass of Soil Chloride, based upon Soil Chloride Concentration **Rice Operating Company** Site: EME O-19 Jct This estimate prepared by: L. Peter Galusky, Jr. Date: 7/23/2009 Inputs in Blue Font Notes length of affected area (ft) 60 width of affected area (ft) 45 affected area (sq ft) 2,120 affected depth (ft) 20 depth to water table (ft) 20 avg CI- conc of affected soil (ppm) 367 est. natural background CI- conc (ppm) 100 estimated unsat zone mass density (lbs/cu yd) 3,000 CI- conc attributed to source (ppm) 267 volume of affected soil (cu yds) 1,570 total mass of affected soils (lbs) 4,710,000 1,258 mass of residual soil chloride (lbs)

Figure 5 - Estimation of residual soil chloride mass in the affected area <u>contributed by the</u> former junction box.

7



Figure 6- Schematic diagram of soil chloride – groundwater dilution model.

groundwater chloride mass $lbs(t) = groundwater_chloride mass_lbs(t - dt) +$ (chloride leaching lbs per vr - natural groundwater_dilution) * dt INIT groundwater_chloride_mass_lbs = 0 **INFLOWS:** chloride leaching lbs per yr =(chloride_leaching_rate/depth_to_groundwater)*soil_chloride_mass lbs **OUTFLOWS:** natural groundwater dilution = groundwater chloride mass lbs*groundwater_dilution_rate soil chloride mass lbs(t) = soil chloride mass lbs(t - dt) + (chloride leaching lbs per vr) * dt INIT soil chloride mass lbs = 1,258 **OUTFLOWS:** chloride leaching_lbs per yr = (chloride_leaching_rate/depth_to_groundwater)*soil_chloride_mass__lbs aquifer porosity = 0.3baseline_groundwater_chloride_concentration = 0 chloride leaching rate = IF(infiltration barrier ?=0) THEN 2.0 ELSE 2.0/20 depth to groundwater = 20eliptical_plume_length = 250 eliptical_plume_max_wisth = eliptical_plume_length/2.5 groundwater_chloride_concentration_ppm = 119962*(groundwater_chloride_mass_lbs)/(groundwater_plume_volume*7.5)+baseline_gr oundwater_chloride_concentration groundwater $Cl_std = 250$ groundwater dilution rate = 0.1groundwater_plume_volume = (3.14*(eliptical plume length/2)*(eliptical plume max wisth/2)*groundwater thickness)* aquifer porosity groundwater_thickness = 10 infiltration_barrier_? = 0

Figure 7 – Model equations and parameter values for soil chloride – groundwater dilution model.



Figure 8 – Estimated change in <u>baseline</u> groundwater chloride concentrations (right axes) over time within a hypothetical plume originating at the former junction box and extending down-gradient for 250 ft and having a maximum width of 100 ft. <u>The maximum anticipated elevation</u> in groundwater chlorides in a reference plume of 250 ft in length by 100 ft in width due to the former junction box is less than 150 ppm.

APPENDICES

- Appendix A NMOCD approval of Investigation and Characterization Plan
- Appendix B Soil bore descriptions and analytical data
- Appendix C Laboratory data
- Appendix D Photographs

Image:	AT&T Yahoo! Mail - lpg@texerra.com	Page 1 of
Endet Endet SMALL PLOCE Endet Weiger IPA Proposal FIRE 2011, 21822-117, 218426-159 Take The, 17 Jul 2008 1270-124, 4000 Weiger "Take, 17 Jul 2008 1270-124, 4000 Term "Take, 12 Jul 2008 1270-124, 12 Jul 2009 1200, 2008 Jul 200, 2008, 4000 Term "Take, 12 Jul 2009 120, 2009 20, 2009 20, 2008 Jul 2009, 2008, 607 the Rice Personger . EME SWD Det, 0-19 submitted by Texerra on 6/6/2008 #1R425-117 <tr< th=""><th></th><th></th></tr<>		
 Budgett: ICP Approvals: #1R427-06; #1R427-161; #1R426-117; #1R426-117; #1R426-117; Batter The, 12 hal 2008 12:01-24. 4000 Prom: "Transen, Edward 1, HMRD" edwards hamengelater rm uses: The "Transen, Edward 1, HMRD" edwards hamengelater rm uses: The 'New' Mayne, LMMRD' edwards protected date mm.uses, mburrowsdywalemet.com, hpg@teserra.com Dear Mr. Conder: The New Mexico Oil Conservation Division (NMOCD) has reviewed the submitted Investigation Characterization Plans (ICPs), dated May 30, 2008 and June 3, 2008, for the above referenced sites. The NMOCD hereby conditionally approves the following ICPs for the Rice Operating Company sites: EME SWD Jct. 0-19 submitted by Texerra on 6/6/2008 #1R427-06 <u>EME SWD Dyt Phillips 'B' EOL</u> submitted by Texerra on 6/6/2008 #1R426-117 BD SWD Oxy Owen 'A' submitted by Texerra on 6/6/2008 #1R426-117 BD SWD Jct. P-35-1 submitted by Texerra on 6/6/2008 #1R426-150 In the proposed work elements for all ICPs please include that the delineation of chlorides will be to 250 mg/Kg. In the proposed work elements for EME SWD Phillips 'B' EOL (#1R427-181) and BD SWD Oxy Owen 'A' (#1R426-117) please include that the delineation of petroleum hydrocarbons will be to 100 ppm using a PID (or equivalent). Also, for <u>BD SWD Oxy Owen 'A'</u> (#1R426-117) please include re-sampling of the backfill material for perioleum hydrocarbons. In the proposed work elements for all ICPs please include the analyses for 'general chemistry'' (including chloride, TDS, and sulfate) and BTEX for potential groundwater sampling. Also, please be advised that NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or reg		Print - Close Windo
 Date: The, 17 Jul 2008 17 01:24 - 0600 From: "Hanker, Edward 1, 19980" edwards hamengetate: rm.us>. The: "Hanker, Edward 2, 19980" edwards hamengetate: rm.us>. The: "Hanker, Edward: 1, 19980" edwards hamengetate: rm.us>. The: New Mexico Oil Conservation Division (NMOCD) has reviewed the submitted fureweightation Plans (ICPs), dated May 30, 2008 and June 3, 2008, for the above referenced sites. The NMOCD hereby conditionally approves the following ICPs for the Rice Organization Plans (ICPs), dated May 30, 2008 and June 3, 2008, for the above referenced sites. The NMOCD hereby conditionally approves the following ICPs for the Rice Organization Plans (ICPs), dated May 30, 2008 and June 3, 2008, for the above referenced sites. The NMOCD hereby conditionally approves the following ICPs for the Rice Organization Plans (ICPs), dated by Texerra on 6/6/2008 #1R427-06 EME SWD Jct. 0-19 submitted by Texerra on 6/6/2008 #1R426-117 BD SWD Oxy Owen 'A', submitted by Texerra on 6/6/2008 #1R426-117 BD SWD Jct. P-35-1 submitted by Texerra on 6/6/2008 #1R426-150 In the proposed work elements for all ICPs please include that the delineation of chlorides will be to 200 ppm using a PID (or equivalent). Also, please be advised that NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.	Subject: ICP Approvals: #1R427-06; #1R427-181; #1R426-117; #1R426-150	
 Prom: "Plansen, Edward 1, B4080" «edward) hansenglatate rm. us> The "Plack Conder" «homolet@tikeswid.com> The New Mexico Oil Conservation Division (NMOCD) has reviewed the submitted Investigation Characterization Plans (ICPs), dated May 30, 2008 and June 3, 2008, for the above referenced sites. The NMOCD hereby conditionally approves the following ICPs for the Rice Operating Company sites: EME SWD Jct. O-19 submitted by Texerra on 6/6/2008 #1R427-06 EME SWD Phillips 'B' EOL submitted by Texerra on 6/6/2008 #1R427-181 BD SWD Oxy Owen 'A' submitted by Texerra on 6/6/2008 #1R426-117 BD SWD Jct. P-35-1 submitted by Texerra on 6/6/2008 #1R426-150 In the proposed work elements for all ICPs please include that the delineation of chlorides will be to 250 mg/Kg. In the proposed work elements for all ICPs please include the analyses for 'general chemistry' (including chloride, TDS, and sulfate) and BTEX for potential groundwater sampling. Also, for BD SWD Oxy Owen 'A' (#1R426-117) please include the analyses for 'general chemistry'' (including chloride, TDS, and sulfate) and BTEX for potential groundwater sampling. Also, please be advised that NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.	Date: Thu, 17 Jul 2008 17:01:24 -0600	
 The New Mexico Oil Conservation Division (NMOCD) has reviewed the submitted Investigation Characterization Plans (ICPs), dated May 30, 2008 and June 3, 2008, for the above referenced sites. The NMOCD hereby conditionally approves the following ICPs for the Rice Operating Company sites: I. EME SWD Jct. O-19 submitted by Texerra on 6/6/2008 #1R427-06 2. EME SWD Phillips 'B' EOL submitted by Texerra on 6/6/2008 #1R427-181 3. BD SWD Oxy Owen 'A' submitted by Texerra on 6/6/2008 #1R426-117 4. BD SWD Jct. P-35-1 submitted by Texerra on 6/6/2008 #1R426-150 In the proposed work elements for all ICPs please include that the delineation of chlorides will be to 250 mg/Kg. In the proposed work elements for ZME SWD Phillips 'B' EOL (#1R427-181) and BD SWD Oxy Owen 'A' (#1R426-117) please include that the delineation of chlorides will be to 200 mg/Kg. In the proposed work elements for ILCPs please include that the delineation of chlorides will be to 200 mg/Kg. In the proposed work elements for ILCPs please include re-sampling of the backfill material for petroleum hydrocarbons. In the proposed work elements for all ICPs please include the analyses for 'general chemistry'' (including chloride, TDS, and sulfate) and BTEX for potential groundwater sampling. Also, please be advised that NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.	Prom: "Hansen, Edward 1., EMNRD" < edward); hansen@state.nm.us >	
 Mark Wayne, HWRD' 'wayne pitoe@state nmuus-, mburrows@valornet.com, hpgtteetra.com Dear Mr, Conder: The New Mexico Oil Conservation Division (NMOCD) has reviewed the submitted forvestigation Characterization Plans (ICPs), dated May 30, 2008 and June 3, 2008, for the above foreferenced sites. The NMOCD hereby conditionally approves the following ICPs for the Rice Operating Company sites: EME SWD Jct O-19 submitted by Texerra on 6/6/2008 #1R427-08 EME SWD Dyt Oxy Owen 'A' submitted by Texerra on 6/6/2008 #1R426-117 BD SWD Oxy Owen 'A' submitted by Texerra on 6/6/2008 #1R426-150 In the proposed work elements for all ICPs please include that the delineation of chlorides will be to 200 mg/kg. Interproposed work elements for EME SWD Phillips 'B' EOL (#1R427-181) and BD SWD Oxy Open using a PID (or equivalent). Also, for BD SWD Oxy Owen 'A' (#1R426-117) please include re-sampling of the backfill material for perroleum hydrocarbons. In the proposed work elements for all ICPs please include the analyses for "general chemistry" (including chloride, TDS, and sulfate) and BTEX for potential groundwater sampting. Also, please be advised that NMOCD approval of these plans does not relie ve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.	To: "Hack Conder" < hconder@riceswd.com >	
 Dear Mr. Conder: The New Mexico Oil Conservation Division (NMOCD) has reviewed the submitted Investigation Characterization Plans (ICPs), dated May 30, 2008 and June 3, 2008, for the above referenced sites. The NMOCD hereby conditionally approves the following ICPs for the Rice Operating Company sites: EME SWD Jct. O-19 submitted by Texerra on 6/6/2008 #1R427-06 EME SWD Phillips 'B' EOL submitted by Texerra on 6/6/2008 #1R426-181 BD SWD Oxy Owen 'A' submitted by Texerra on 6/6/2008 #1R426-117 BD SWD Jct. P-35-1 submitted by Texerra on 6/6/2008 #1R426-150 In the proposed work elements for all ICPs please include that the delineation of chlorides will be to 250 mg/Kg. In the proposed work elements for EME SWD Phillips 'B' EOL (#1R427-181) and BD SWD Oxy Owen 'A' (#1R426-117) please include that the delineation of petroleum hydrocarbons will be to 100 ppm using a PID (or equivalent). Also, for BD SWD Oxy Owen 'A' (#1R426-117) please include re-sampling of the backfill material for perroleum hydrocarbons. In the proposed work elements for all ICPs please include the analyses for 'general chemistry'' (including chloride, TDS, and sulfate) and BTEX for potential groundwater sampling. Also, please be advised that NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.	CC: "Price, Wayne, EMNRD" < wayne.price@state.nm.us>, mburrows@vakornet.com,	lpg@texerra.com
 The New Mexico Oil Conservation Division (NMOCD) has reviewed the submitted Investigation Characterization Plans (ICPs), dated May 30, 2008 and June 3, 2008, for the above referenced sites. The NMOCD hereby conditionally approves the following ICPs for the Rice Operating Company sites: I. EME SWD Jct. O-19 submitted by Texerra on 6/6/2008 #1R427-06 2. EME SWD Phillips 'B' EOL submitted by Texerra on 6/6/2008 #1R427-181 3. BD SWD Oxy Owen 'A' submitted by Texerra on 6/6/2008 #1R426-117 4. BD SWD Jct. P-35-1 submitted by Texerra on 6/6/2008 #1R426-150 In the proposed work elements for all ICPs please include that the delineation of chlorides will be to 250 mg/Kg. In the proposed work elements for EME SWD Phillips 'B' EOL (#1R427-181) and BD SWD Oxy Owen 'A' (#1R426-117) please include that the delineation of petroleum hydrocarbons will be to 100 ppm using a PID (or equivalent). Also, for BD SWD Oxy Owen 'A' (#1R426-117) please include re-sampling of the backfill material for petroleum hydrocarbons. In the proposed work elements for all ICPs please include the analyses for 'general chemistry'' (including chloride, TDS, and sulfate) and BTEX for potential groundwater sampling. Also, please be advised that NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.	Dear Mr. Conder	
 The New Mexico Oil Conservation Division (NMOCD) has reviewed the submitted Investigation Characterization Plans (ICPs), dated May 30, 2008 and June 3, 2008, for the above referenced sites. The NMOCD hereby conditionally approves the following ICPs for the Rice Operating Company sites: EME SWD Ict. O-19 submitted by Texerra on 6/6/2008 #1R427-06 EME SWD Phillips 'B' EOL submitted by Texerra on 6/6/2008 #1R427-181 BD SWD Oxy Owen 'A' submitted by Texerra on 6/6/2008 #1R426-117 BD SWD Jct. P-35-1 submitted by Texerra on 6/6/2008 #1R426-150 In the proposed work elements for all ICPs please include that the delineation of chlorides will be to 250 mg/Kg. In the proposed work elements for EME SWD Phillips 'B' EOL (#1R427-181) and BD SWD Oxy Owen 'A' (#1R426-117) please include that the delineation of petroleum hydrocarbons will be to 100 ppm using a PID (or equivalent). Also, of BD SWD Oxy Owen 'A' (#1R426-117) please include the analyses for 'general chemistry' (including chloride, TDS, and sulfate) and BTEX for potential groundwater sampling. Also, please be advised that NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.	Dear Mr. Conder.	
The New Mexico Oil Conservation Division (NMOCD) has reviewed the submitted Investigation Characterization Plans (ICPs), dated May 30, 2008 and June 3, 2008, for the above referenced sites. The NMOCD hereby conditionally approves the following ICPs for the Rice Operating Company sites: 1. EME SWD Jct. O-19 submitted by Texerra on 6/6/2008 #1R427-06 2. EME SWD Phillips 'B' EOL submitted by Texerra on 6/6/2008 #1R427-181 3. BD SWD Oxy Owen 'A' submitted by Texerra on 6/6/2008 #1R426-117 4. BD SWD Jct. P-35-1 submitted by Texerra on 6/6/2008 #1R426-150 In the proposed work elements for all ICPs please include that the delineation of chlorides will be to 250 mg/Kg. In the proposed work elements for <u>EME SWD Phillips 'B' EOL</u> (#1R427-181) and <u>BD SWD Oxy</u> <u>Owen 'A'</u> (#1R426-117) please include that the delineation of chlorides will be to 100 pm using a PID (or equivalent). Also, for <u>BD SWD Oxy Owen 'A'</u> (#1R426-117) please include re-sampling of the backfill material for petroleum hydrocarbons. In the proposed work elements for all ICPs please include the analyses for ''general chemistry'' (including chloride, TDS, and sulfate) and BTEX for potential groundwater sampling. Also, please be advised that NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.		
 EME SWD Jct. O-19 submitted by Texerra on 6/6/2008 #1R427-06 EME SWD Phillips 'B' EOL submitted by Texerra on 6/6/2008 #1R427-181 BD SWD Oxy Owen 'A' submitted by Texerra on 6/6/2008 #1R426-117 BD SWD Jct. P-35-1 submitted by Texerra on 6/6/2008 #1R426-150 In the proposed work elements for all ICPs please include that the delineation of chlorides will be to 250 mg/Kg. In the proposed work elements for <u>EME SWD Phillips 'B' EOL</u> (#1R427-181) and <u>BD SWD Oxy Owen 'A'</u> (#1R426-117) please include that the delineation of petroleum hydrocarbons will be to 100 ppm using a PID (or equivalent). Also, for <u>BD SWD Oxy Owen 'A'</u> (#1R426-117) please include the analyses for "general for petroleum hydrocarbons. In the proposed work elements for all ICPs please include the analyses for "general chemistry" (including chloride, TDS, and sulfate) and BTEX for potential groundwater sampling. Also, please be advised that NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval of these plans does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.	The New Mexico Oil Conservation Division (NMOCD) has Investigation Characterization Plans (ICPs), dated May 30, 2008 and referenced sites. The NMOCD hereby conditionally approves the fo Operating Company sites:	reviewed the submitted f June 3, 2008, for the above flowing ICPs for the Rice
 EME SWD Jct. O-19 submitted by Texerra on 6/6/2008 #1R427-06 EME SWD Phillips 'B' EOL submitted by Texerra on 6/6/2008 #1R426-181 BD SWD Oxy Owen 'A' submitted by Texerra on 6/6/2008 #1R426-117 BD SWD Jct. P-35-1 submitted by Texerra on 6/6/2008 #1R426-150 In the proposed work elements for all ICPs please include that the delineation of chlorides will be to 250 mg/Kg. In the proposed work elements for <u>EME SWD Phillips 'B' EOL</u> (#1R427-181) and <u>BD SWD Oxy Owen 'A'</u> (#1R426-117) please include that the delineation of petroleum hydrocarbons will be to 100 ppm using a PID (or equivalent). Also, for <u>BD SWD Oxy Owen 'A'</u> (#1R426-117) please include re-sampling of the backfill material for petroleum hydrocarbons. In the proposed work elements for all ICPs please include the analyses for ''general chemistry'' (including chloride, TDS, and sulfate) and BTEX for potential groundwater sampling. Also, please be advised that NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.		
 EME SWD Phillips 'B' EOL submitted by Texerra on 6/6/2008 #1R427-06 EME SWD Phillips 'B' EOL submitted by Texerra on 6/6/2008 #1R426-117 BD SWD Oxy Owen 'A' submitted by Texerra on 6/6/2008 #1R426-117 BD SWD Jct. P-35-1 submitted by Texerra on 6/6/2008 #1R426-150 In the proposed work elements for all ICPs please include that the delineation of chlorides will be to 250 mg/Kg. In the proposed work elements for <u>EME SWD Phillips 'B' EOL (#1R427-181)</u> and <u>BD SWD Oxy Owen 'A' (#1R426-117)</u> please include that the delineation of petroleum hydrocarbons will be to 100 ppm using a PID (or equivalent). Also, for <u>BD SWD Oxy Owen 'A' (#1R426-117)</u> please include re-sampling of the backfill material for petroleum hydrocarbons. In the proposed work elements for all ICPs please include the analyses for "general the proposed work elements for all ICPs please include the analyses for "general the proposed work elements for all ICPs please include the analyses for "general the proposed work elements for all ICPs please include the analyses for "general the proposed work elements for all ICPs please include the analyses for "general the proposed work elements for all ICPs please include the analyses for "general the proposed work elements for all ICPs please include the analyses for "general the proposed work elements for all ICPs please include the analyses for "general the proposed work elements for all ICPs please include the analyses for "general the proposed work elements for all ICPs please include the analyses for "general the proposed work elements for all ICPs please include the analyses for "general the proposed work elements for all ICPs please include the analyses for "general the proposed work elements for all ICPs please include the analyses for "general the proposed work elements for all ICPs please include the analyses for "general the proposed work elements for all ICPs please include the analyses for "general the proposed wo	THE SUP LESS IN THE PARTY OF	CICIDD00 #10 107 0C
 <u>EME SWD Phillips 'B' EOL</u> submitted by Texerra on 6/6/2008 #1R427-181 <u>BD SWD Oxy Owen 'A'</u> submitted by Texerra on 6/6/2008 #1R426-117 <u>BD SWD Jct. P-35-1</u> submitted by Texerra on 6/6/2008 #1R426-150 In the proposed work elements for all ICPs please include that the delineation of chlorides will be to 250 mg/Kg. In the proposed work elements for <u>EME SWD Phillips 'B' EOL</u> (#1R427-181) and <u>BD SWD Oxy Owen 'A'</u> (#1R426-117) please include that the delineation of petroleum hydrocarbons will be to 100 ppm using a PID (or equivalent). Also, for <u>BD SWD Oxy Owen 'A'</u> (#1R426-117) please include re-sampling of the backfill material for petroleum hydrocarbons. In the proposed work elements for all ICPs please include the analyses for "general chemistry" (including chloride, TDS, and sulfate) and BTEX for potential groundwater sampling. Also, please be advised that NMOCD approval of these plans does not relieve the owner/operator of esponsibility should operations pose a threat to ground water, surface water, human health or the mixronment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.	1. <u>EME SWD Jct. O-19</u> submitted by Texerra on	16/6/2008 #1R427-06
 BD SWD Oxy Owen 'A' submitted by Texerra on 6/6/2008 #1R426-117 BD SWD Jct. P-35-1 submitted by Texerra on 6/6/2008 #1R426-150 In the proposed work elements for all ICPs please include that the delineation of chlorides will be to 250 mg/Kg. In the proposed work elements for <u>EME SWD Phillips 'B' EOL</u> (#1R427-181) and <u>BD SWD Oxy Owen 'A'</u> (#1R426-117) please include that the delineation of petroleum hydrocarbons will be to 100 ppm using a PID (or equivalent). Also, for <u>BD SWD Oxy Owen 'A'</u> (#1R426-117) please include re-sampling of the backfill material for petroleum hydrocarbons. In the proposed work elements for all ICPs please include the analyses for "general chemistry" (including chloride, TDS, and sulfate) and BTEX for potential groundwater sampling. Also, please be advised that NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.	2. <u>EME SWD Phillips 'B' EOL</u> submitted by Te	xerra on 6/6/2008 #1R427-181
4. <u>BD SWD Jct. P-35-1</u> submitted by Texerra on 6/6/2008 #1R426-150 In the proposed work elements for all ICPs please include that the delineation of chlorides will be to 250 mg/Kg. In the proposed work elements for <u>EME SWD Phillips 'B' EOL</u> (#1R427-181) and <u>BD SWD Oxy Owen 'A'</u> (#1R426-117) please include that the delineation of petroleum hydrocarbons will be to 100 ppm using a PID (or equivalent). Also, for <u>BD SWD Oxy Owen 'A'</u> (#1R426-117) please include re-sampling of the backfill material for petroleum hydrocarbons. In the proposed work elements for all ICPs please include the analyses for "general chemistry" (including chloride, TDS, and sulfate) and BTEX for potential groundwater sampling. Also, please be advised that NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the anvironment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.	3. BD SWD Oxy Owen 'A' submitted by Texerr	a on 6/6/2008 #1R426-117
In the proposed work elements for all ICPs please include that the delineation of chlorides will be to 250 mg/Kg. In the proposed work elements for <u>EME SWD Phillips 'B' EOL</u> (#1R427-181) and <u>BD SWD Oxy Owen 'A'</u> (#1R426-117) please include that the delineation of petroleum hydrocarbons will be to 100 ppm using a PID (or equivalent). Also, for <u>BD SWD Oxy Owen 'A'</u> (#1R426-117) please include re-sampling of the backfill material for petroleum hydrocarbons. In the proposed work elements for all ICPs please include the analyses for "general chemistry" (including chloride, TDS, and sulfate) and BTEX for potential groundwater sampling. Also, please be advised that NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.	4. <u>BD SWD Jct. P-35-1</u> submitted by Texerra on	6/6/2008 #1R426-150
In the proposed work elements for all ICPs please include that the delineation of chlorides will be to 250 mg/Kg. In the proposed work elements for <u>EME SWD Phillips 'B' EOL</u> (#1R427-181) and <u>BD SWD Oxy</u> <u>Owen 'A'</u> (#1R426-117) please include that the delineation of petroleum hydrocarbons will be to 100 ppm using a PID (or equivalent). Also, for <u>BD SWD Oxy Owen 'A'</u> (#1R426-117) please include re-sampling of the backfill material for petroleum hydrocarbons. In the proposed work elements for all ICPs please include the analyses for "general chemistry" (including chloride, TDS, and sulfate) and BTEX for potential groundwater sampling. Also, please be advised that NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.		
In the proposed work elements for <u>EME SWD Phillips 'B' EOL</u> (#1R427-181) and <u>BD SWD Oxy</u> <u>Owen 'A'</u> (#1R426-117) please include that the delineation of petroleum hydrocarbons will be to 100 ppm using a PID (or equivalent). Also, for <u>BD SWD Oxy Owen 'A'</u> (#1R426-117) please include re-sampling of the backfill material for petroleum hydrocarbons. In the proposed work elements for all ICPs please include the analyses for "general chemistry" (including chloride, TDS, and sulfate) and BTEX for potential groundwater sampling. Also, please be advised that NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility should operations, state, or local laws and/or regulations.	In the proposed work elements for all ICPs please include that the de 250 mg/Kg.	lineation of chlorides will be to
Also, for <u>BD SWD Oxy Owen 'A'</u> (#1R426-117) please include re-sampling of the backfill material for petroleum hydrocarbons. In the proposed work elements for all ICPs please include the analyses for "general chemistry" (including chloride, TDS, and sulfate) and BTEX for potential groundwater sampling. Also, please be advised that NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.	In the proposed work elements for <u>EME SWD Phillips 'B' EOL</u> (#11 <u>Owen 'A'</u> (#1R426-117) please include that the delineation of petrol ppm using a PID (or equivalent).	R427-181) and <u>BD SWD Oxy</u> eum hydrocarbons will be to 100
In the proposed work elements for all ICPs please include the analyses for "general chemistry" (including chloride, TDS, and sulfate) and BTEX for potential groundwater sampling. Also, please be advised that NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.	Also, for <u>BD SWD Oxy Owen 'A'</u> (#1R426-117) please include re-s for petroleum hydrocarbons.	sampling of the backfill material
Also, please be advised that NMOCD approval of these plans does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.	In the proposed work elements for all ICPs please include the analys chemistry" (including chloride, TDS, and sulfate) and BTEX for pot	es for "general ential groundwater sampling.
	Also, please be advised that NMOCD approval of these plans does n responsibility should operations pose a threat to ground water, surfac environment. In addition, NMOCD approval does not relieve the ow compliance with any OCD, federal, state, or local laws and/or regula	ot relieve the owner/operator of e water, human health or the mer/operator of responsibility for tions.

Texerra























Appendix B6 – Soil boring SB-6 cuttings descriptions and analytical data.





PITONE (615) 193-2126 + 101 E. MARLAND + HORHS INM 56248 ABORATORIES ANALYTICAL RESULTS FOR RICE OPERATING COMPANY ATTN: HACK CONDER 122 W. TAYLOR HOBBS, NM 88240 Receiving Date: 09/12/08 Sampling Date: 09/09/08 Reporting Date: 09/16/08 Sample Type: SOIL Project Number: NOT GIVEN Sample Condition: COOL & INTACT Project Name: EME JCT, 0-19 Sample Received By: ML Project Location: EME JCT 0-19 Analyzed By: AB/HM GRO DRO $(C_5 - C_{10})$ CI~ (>C10-C28) LAB NUMBER SAMPLE ID img/kg) (mg/kg) (mg/kg) ANALYSIS DATE 09/16/08 09/16/08 09/15/08 H15922-1 \$8#1 @ 15' <25.0 <25.0 704 e---H15922-2 SB#2 @ 15' <25,0 <25.0 832 H15922-3 S3#3 @ 15' <25.0 <25.0 16 H15922-4 S3#4 @ 15 <25.0 <25.0 352 H15922-5 £3#5 @ 15' <25.0 <25.0 624 H15922-6 ______S3#3 @ 15' <25.0 <25.0 An H15922-7 S8#7 @ 15' <25.0 <25.0 976 Quality Control 570 527 500 ł True Value QC 500 500 500 % Recovery 114 105 100 **Relative Percent Difference** 4.8 2,0 4.3 METHODS: TPH GRO & DRO: EPA SW-845 8015 M; CI : Sid, Methods 4500-CI B *Analyses performed on 1:4 w/v aqueous excracts Chemist H15922 TOL RICE ECEASS NO (C) Cability and Demogree. Continue's and your distribution of the Annual Annual Control of the Annual Procession of Annual Procession of the Annual Procession of Annual Procesion of Annual Procession of Annual Processi

Appendix C1 – Cardinal Laboratories soil analysis data



Appendix C2 – Cardinal Laboratories sample chain-of-custody form.



Appendix D1 – View toward NW drilling SB-1.



Appendix D2 – View looking SE toward SB-2 (staked).



Appendix D3 – View looking SW toward SB-5 (staked).