

1R - 428-59

REPORTS

DATE:

10-7-10

R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266.0745

October 7, 2010

RECEIVED OCD

2010 OCT -8 A 10:33

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

**RE: Rice Operating Company, Hobbs SWD System A-6 Vent Site: T-19-S, R-38-E,
Section 6, Unit A, Lea County, New Mexico, (NMOCD CASE #1R428-59),
Report on Corrective Actions Taken**

Mr. Hansen:

On behalf of Rice Operating Company (ROC), R.T. Hicks Consultants, Ltd. is submitting this description of Corrective Actions for the Hobbs A-6 Vent site per NMOCD request. As stated in our June 8, 2010 CAP, our investigation demonstrates that residual salt and hydrocarbons in the vadose zone will not with reasonable probability contaminate ground water or surface water, in excess of the standards in Subsections B and C of 19.15.30.9 NMAC through leaching, percolation or other transport mechanisms, or as the water table elevation fluctuates. A monitoring well located as close as possible to the former Vent site (about 85-feet down gradient) shows no evidence of ground water impairment. Revegetation of the site, our recommended corrective action, meets the mandate of NMOCD Rules for protection of surface water and the environment.

Corrective Actions

Our recommended corrective action for the site is re-vegetation of the ground surface to limit infiltration of precipitation and the subsequent migration of constituents of concern to ground water. Attachment A includes documentation of re-seeding efforts. These included:

- Scraping the site down to 1 ft below grade,
- Removing 36 cubic yards of soil from surface of site for disposal at Sundance facility,
- Importing 36 yards of clean blow sand,
- Blending soil amendments into imported soil,
- Installing silt net fencing around the site in a 20 ft x 25 ft area
- Placing imported and amended soil inside fenced area and seeding with native grasses

Figure 1. Photo documentation of site vegetation, August 2010.



Ground Water Monitoring

The table below presents all collected ground water data from the site to date. Attachment B contains the most recent laboratory analyses results with chain of custody documentation. Per NMOCD request, ground water was analyzed for Total Petroleum Hydrocarbons (TPH) in July of 2010. Ground water quality data show concentrations of analyzed constituents do not exceed WQCC standards.

Table 1. All Collected Ground Water Monitoring Results, MW-1, A-6 Vent

Date	Chloride	Sulfate	TDS	Benzene	Toluene	Ethyl Benzene	Total Xylenes	GRO (C8-C10)	DRO (>C10-C28)	DRO EXT (>C28-C35)
(mg/L)										
3/31/2009	44	136	609	ND	ND	ND	ND	Not Analyzed		
6/10/2009	40	123	654	ND	ND	ND	ND			
9/14/2009	40	113	645	ND	ND	ND	ND			
11/20/2009	40	90.6	611	ND	ND	ND	ND			
3/17/2010	40	146	661	ND	ND	ND	ND			
6/8/2010	44	130	673	ND	ND	ND	ND			
7/14/2010	44	115	644	ND	ND	ND	ND	ND	ND	ND


ND: Not Detected above laboratory detection limit

Further Action

Per NMOCD request, ROC will obtain ground water samples from MW-1 and analyze for chloride, TDS, BTEX and TPH semi-annually (twice a year) from the present day through June of 2014. An alternative sampling frequency may be requested in the future depending on results.

Please contact Hack Conder of ROC at 575-393-9174 if you have any questions concerning this submission. Thank you for your time and consideration.

Sincerely,
R.T Hicks Consultants, Ltd.



Katie Lee
Project Scientist

Copy: Hack Conder, ROC

Attachment A

Re-Seeding Site Documentation

R.T. Hicks Consultants, Ltd.

901 Rio Grande Blvd. NW, Suite F-142
Albuquerque, NM 87104

Hobbs A-6 vent
(UL A, Section 6, T19S, R38E)

7/2/2010 Site was scraped down approximately 1 ft below ground surface (BGS). 36 cubic yards were properly disposed of at the OCD approved facility Sundance. 36 cubic yards of clean blow sand was imported to the site. The imported soil was blended with peanut hay, 2 bags (4 cubic feet) of peat moss, and 6 bags (6 cubic feet) of organic compost. Silt net fencing was installed around the site, a 20x25 ft area.

7/6/2010 The blended soil was returned to the scraped area and the site was seeded with 3 lbs of Pecos Mix, 3 lbs of wild oats, and ½ lbs of blue grama. The seed was chained in and the silt netting and fence was completed around the site.



112 West Taylor
Hobbs, NM 88240
Phone: (575) 393-9174
Fax: (575) 393-0293

REVEGETATION FORM

1. General Information

Site name: Hobbs A-6 Vent (IR 0428-59)						
U/L A	Section 6	Township 19S	Range 38E	County LEA	Latitude N 32°41.599'	Longitude W103°10.951'
Contact Name: Bruce Baker						
Email: bbaker@riceswd.com						
Site size: 500		square feet		Map detail of site attached <input type="checkbox"/>		
Additional information:						

2. Soils

**Do not rip caliche subsoils; caliche rocks brought to the surface by ripping shall be removed.*

Salvaged from site <input type="checkbox"/>	Bioremediated <input type="checkbox"/>	Imported <input checked="" type="checkbox"/>	Blended <input type="checkbox"/>	Depth (in):
Texture: Sandy		Describe soil & subsoil: Sand over Caliche		
Soil prep methods: Rip <input type="checkbox"/>	Depth(in):	Disc <input type="checkbox"/>	Depth (in):	Rollerpack <input type="checkbox"/>
Date completed: 7/06/2010				

3. Bioremediation

Fertilizer <input type="checkbox"/>	Hay <input checked="" type="checkbox"/>	Other <input checked="" type="checkbox"/>
Type:	Describe: Organic compost and Peat moss	
Lbs/acre:		

4. Seeding

**Attach seed bag tags to this form. Seed bag tags shall contain the site name and S-T-R.*

Custom seed mix <input checked="" type="checkbox"/>	Prescribed mix <input type="checkbox"/>	Seed mix name: Pecos mix	Seeding date: 7/6/2010
Broadcast <input checked="" type="checkbox"/>			
Method: Broadcast by hand			
Soil conditions during seeding: Dry <input type="checkbox"/> Damp <input checked="" type="checkbox"/> Wet <input type="checkbox"/>			
Photos attached <input type="checkbox"/>	Observations: 3 lbs. Pecos Mix, 3 lbs. Racehorse Oats, 1/2 lb Blue Grama		
Number of photos:			

5. Certification: I hereby certify that the information in this form and attachments is true and complete to the best of my knowledge and belief.

Name: Joe Gatts	Title: Environmental Tech.	Date: 7/22/10
Signature: <i>Joe Gatts</i>		

Hobbs A-6 vent (1R428-59)



scraping the site



hauling in clean, imported soil to blend with peanut hay



adding amendments



spreading clean, imported soil blended with peanut hay and amendments



seeding the site



site complete

Attachment B

Laboratory Results

R.T. Hicks Consultants, Ltd.

901 Rio Grande Blvd. NW, Suite F-142
Albuquerque, NM 87104



CARDINAL LABORATORIES

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

July 27, 2010

Hack Conder
Rice Operating Company
112 West Taylor
Hobbs, NM 88240

Re: Hobbs A-6 Vent (Revised Report)

Enclosed are the results of analyses for sample number H20363, received by the laboratory on 07/16/10 at 1:35 pm.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method SW-846 8260	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method TX 1005	Total Petroleum Hydrocarbons

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

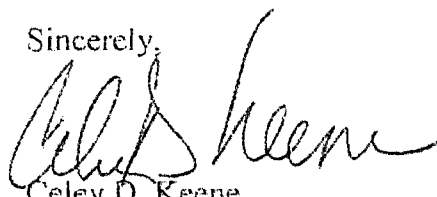
Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.2	Regulated VOCs (V2, V3)

Accreditation applies to public drinking water matrices.

Total Number of Pages of Report: 5 (includes Chain of Custody)

Sincerely,



Celey D. Keene
Laboratory Director

This report conforms with NELAP requirements.



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


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

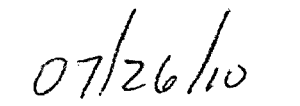
Receiving Date: 07/16/10
Reporting Date: 07/20/10
Project Number: NOT GIVEN
Project Name: HOBBS A-6 VENT
Project Location: T19S R38E SEC6A ~ LEA COUNTY, NM

Sampling Date: 07/14/10
Sample Type: WATER
Sample Condition: COOL & INTACT
Sample Received By: JH
Analyzed By: HM

LAB NO.	SAMPLE ID	Cl ⁻ (mg/L)	SO ₄ (mg/L)	TDS (mg/L)
Analysis Date:		07/20/10	07/20/10	07/19/10
H20363-1	MONITOR WELL #1	44	115	644
Quality Control		510	39.6	NR
True Value QC		500	40.0	NR
% Recovery		102	99.1	NR
Relative Percent Difference		< 0.1	3.0	1.6
METHOD: Standard Methods, EPA		4500-Cl ⁻ B	375.4	160.1

Not accredited for Chloride, Sulfate and TDS.


Chemist


Date

H20363 RICE

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ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
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HOBBS, NM 88240
FAX TO: (575) 397-1471

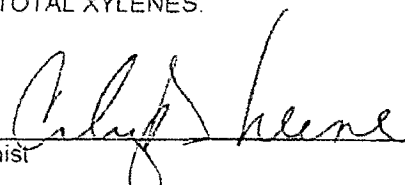
Receiving Date: 07/16/10
Reporting Date: 07/20/10
Project Number: NOT GIVEN
Project Name: HOBBS A-6 VENT
Project Location: T19S-R38E-SEC6 A~ LEA CO., NM

Sampling Date: 07/14/10
Sample Type: WATER
Sample Condition: COOL & INTACT
Sample Received By: JH
Analyzed By: ZL

LAB NUMBE SAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE	07/19/10	07/19/10	07/19/10	07/19/10
H20363-1 MONITOR WELL #1	<0.001	<0.001	<0.001	<0.003
Quality Control	0.010	0.010	0.010	0.031
True Value QC	0.010	0.010	0.010	0.030
% Recovery	100	100	100	103
Relative Percent Difference	9.8	8.6	9.6	5.6

METHOD: EPA SW-846 8021B

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


Chemist

07/26/10
Date

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

Receiving Date: 07/16/10
Reporting Date: 07/27/10*
Project Number: NOT GIVEN
Project Name: HOBBS A-6 VENT
Project Location: T19S-R38E-SEC6 A~ LEA CO., NM

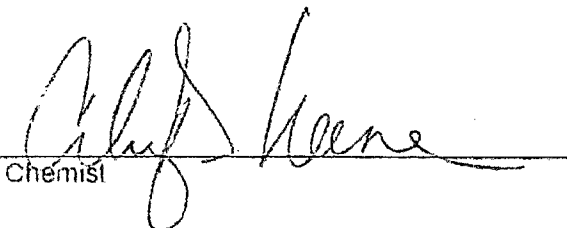
Sampling Date: 07/14/10
Sample Type: WATER
Sample Condition: COOL & INTACT
Sample Received By: JH
Analyzed By: AB

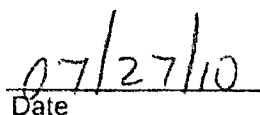
LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/L)	DRO (C ₁₀ -C ₂₈) (mg/L)	DRO EXT. (C ₂₈ -C ₃₅) (mg/L)
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ANALYSIS DATE	07/21/10	07/21/10	07/21/10
H20363-1 MONITOR WELL #1	<1.00	<1.00	<1.00*
Quality Control	536	600	-
True Value QC	500	500	-
% Recovery	107	120	-
Relative Percent Difference	0.5	0.5	-

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

*Revised Report.


Chemist


Date

H20363 WATER TPH RICE

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