1R-427-162

Progress Report

DATE March 10, 2014

From: <u>Laura Flores</u>

To: Lowe, Leonard, EMNRD; VonGonten, Glenn, EMNRD

Cc: "Hack Conder"; "Katie Jones"

Subject: ROC - EME Jct. G-18 (1R427-162) Progress Report

Date: Monday, March 10, 2014 1:40:40 PM

Attachments: ROC - EME Jct. G-18 (1R427-162) Progress Report.pdf

Mr. Lowe,

Attached is the Progress Report for EME Jct. G-18 (1R427-162), as requested by NMOCD in the Update Report approval on July 2, 2013. The Progress Report is intended to update the NMOCD about groundwater quality and groundwater recovery. This report does not require NMOCD approval; therefore, a flow chart is not included.

If you have any questions or require any additional information, please contact Hack Conder at 575-631-6432.

Thank you,

Laura Flores

Project Manager

Rice Environmental Consulting & Safety (RECS)

Rice Environmental Consulting & Safety

P.O. Box 2948, Hobbs, NM 88241 Phone 575.393.2967

March 10th, 2014

Mr. Leonard Lowe

New Mexico Energy, Minerals, & Natural Resources Oil Conservation Division, Environmental Bureau 1220 S. St. Francis Drive Santa Fe, New Mexico 87505

RE: Progress Report

Rice Operating Company – EME SWD System EME Jct. G-18 (1R427-162): UL/G sec. 18 T19S R37E

Mr. Lowe:

RICE Operating Company (ROC) has retained Rice Environmental Consulting and Safety (RECS) to address potential environmental concerns at the above-referenced site in the abandoned EME Salt Water Disposal (SWD) system. ROC is the service provider (agent) for the EME 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.

The site is located approximately 3 miles northwest of Monument, New Mexico at UL/G sec. 18 T19S R37E as shown on the Site Location Map. Monitor well sampling at the site indicates that groundwater is located at 54 ft bgs.

In 2004, ROC initiated work on the former EME G-18 junction box. After initial backhoe characterization, the site was disclosed to NMOCD as a potential groundwater impact site on September 14th, 2004. Since groundwater impact was suspected, MW-1, the near-source well, MW-2, the up gradient well, and MW-3, the down gradient well, were installed on December 6th, 2010. As part of the NMOCD approved ICP Report and Corrective Action Plan (CAP), the excavation for liner installation began November 23rd, 2011. The site was excavated to 44 ft x 49 ft x 5 ft deep and a 20-mil plastic liner of equal size was installed at the base of the excavation between a 6" sand pad above and below the liner. The site was backfilled with clean soil, contoured to the surrounding location, and seeded with a native vegetative mix. In addition, ROC proposed to conduct a 6month source removal and test pumping program. The purpose of this pumping program was to determine if groundwater may be restored within a reasonable time and to assist in the evaluation of groundwater alternatives. As such, the near-source monitor well (MW-1) was plugged and abandoned with a 1-3% bentonite/concrete slurry and capped with three feet of concrete on October 26th, 2011. MW-1 was then replaced with a 4 inch well, MW-1R, on the same day. On April 17th, 2012, a Vadose Zone Remediation and Termination Request was submitted to NMOCD. NMOCD requested ROC must continue to monitor for chlorides and TDS in the groundwater at MW-1R for at least two additional quarters. This site received soil closure on October 15th, 2012.

Groundwater recovery began on September 16th, 2013 from MW-1R. Since that time, approximately 1,055 barrels of groundwater have been removed which equates to approximately 40 kg of chlorides removed from the site, based on a chloride concentration of 236 mg/L. Since groundwater recovery began, chloride and TDS concentrations in MW-1R have decreased, suggesting the pumping program has been effective. ROC will continue the pumping program throughout the 2014 year and then ROC will evaluate the data for continued pumping efficacy. In addition, quarterly groundwater sampling will continue through 2014.

Attached is the Appendix, which contains:

- 1. A site location map.
- 2. A map showing well locations
- 3. A table presenting all laboratory results and depth to groundwater for each well at the site.
- 4. Graphs showing the concentrations of chloride and TDS in groundwater over time.
- 5. The laboratory analytical results for the most recent sampling event.

RECS appreciates the opportunity to work with you on this project. Please call Hack Conder at (575) 393-2967 or me if you have any questions or wish to discuss the site.

Sincerely,

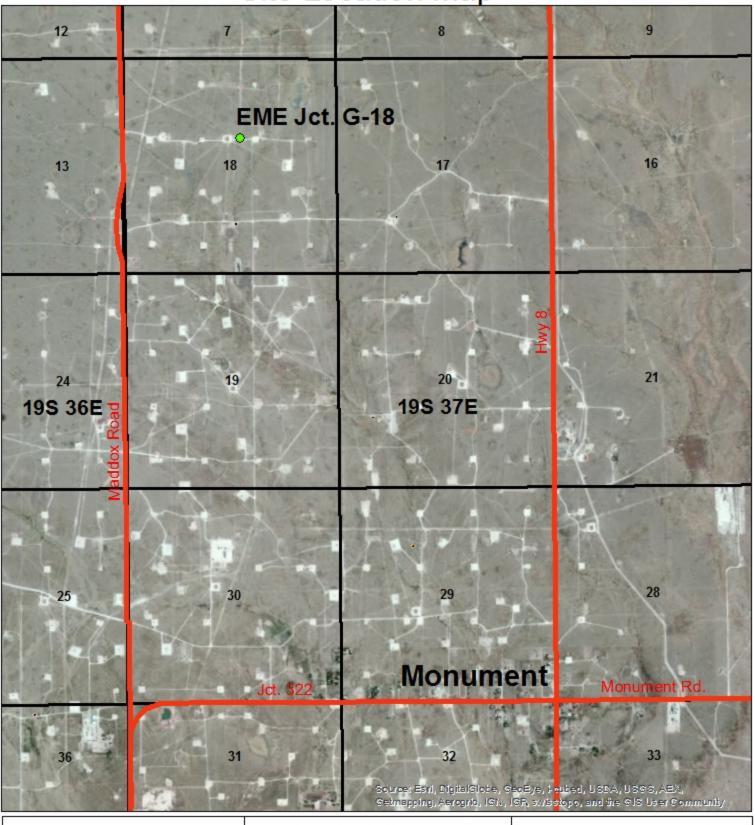
Laura Flores

Rice Environmental Consulting & Safety (RECS)

Project Manager

Alores

Site Location Map

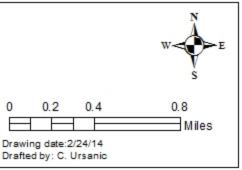




EME Jct. G-18

Unit Letter G, Section 18, T19S, R37E

NMOCD Case #: 1R427-162



Site Map MW₂ abandoned ROC 2.5 in Cl abandoned ROC 4 in AC ROC 4 in poly 44 ft ROC 3 in poly 20 ft 49 ft 18 ft Lease Road MW MW 1R Legend Junction Box Clay Layer @ 6-5 ft bgs MW 3 20-mil Reinforced Liner @ 4.5 ft DGW = 54 ft Figure 2 EME jct. G-18 Legals: UL/G sec. 18 T19S R37E 12.5 CONSULTING & SAFETY, Case #: 1R427-162

Drawing date: 3/13/13 Drafted by: L. Weinheimer

EME Jct. G-18 (1R427-162)

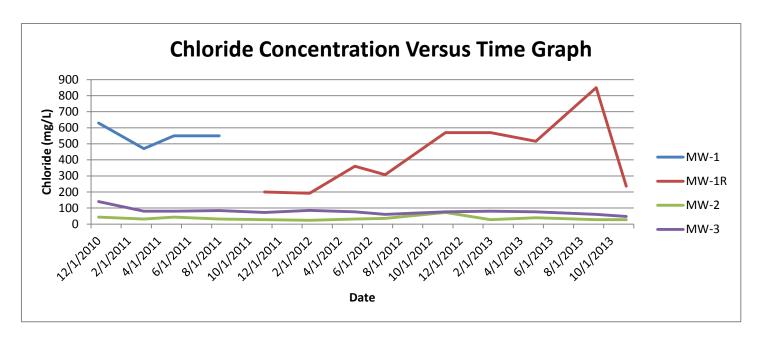
								Ethyl	Total	
	Depth to			Cl	TDS	Benzene	Toluene	Benzene	Xylenes	Sulfate
MW	Water	Total Depth	Sample Date				(mg/L)			
	53.51	68.28	12/28/2010	630	1810	<0.001	<0.001	< 0.001	< 0.003	308
MW-1	53.71	68.28	3/4/2011	470	1670	<0.001	<0.001	<0.001	< 0.003	282
10100-1	54.11	68.28	5/31/2011	550	1560	<0.001	<0.001	<0.001	<0.003	217
	54.33	68.28	8/29/2011	550	1420	<0.001	<0.001	<0.001	<0.003	174

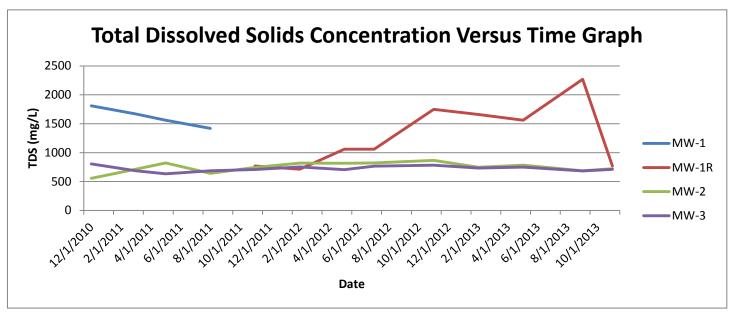
								Ethyl	Total	
	Depth to			Cl	TDS	Benzene	Toluene	Benzene	Xylenes	Sulfate
MW	Water	Total Depth	Sample Date				(mg/L)			
	54.4	100.15	11/14/2011	200	768	<0.001	<0.001	<0.001	<0.003	98.2
	54.64	100.15	2/14/2012	192	713	<0.001	<0.001	<0.001	<0.003	78.1
	54.83	100.15	5/23/2012	360	1060	<0.001	<0.001	<0.001	<0.003	99.4
	54.92	100.15	7/13/2012	308	1060	<0.001	<0.001	<0.001	<0.003	117
MW-1R	55.17	100.15	11/1/2012	570	1750	<0.001	<0.001	<0.001	<0.003	209
	55.28	100.15	2/8/2013	570	1660	<0.001	< 0.001	<0.001	<0.003	243
	55.47	100.15	5/22/2013	516	1560	<0.001	<0.001	<0.001	<0.003	213
	55.26	100.15	9/3/2013	850	2270	<0.001	<0.001	<0.001	<0.003	531
	XXX	100.15	11/11/2013	236	770	<0.001	<0.001	< 0.001	< 0.003	77.8

								Ethyl	Total	
	Depth to			Cl	TDS	Benzene	Toluene	Benzene	Xylenes	Sulfate
MW	Water	Total Depth	Sample Date			-	(mg/L)		-	
	53.38	70.22	12/28/2010	44	557	<0.001	<0.001	<0.001	<0.003	149
	53.58	70.22	3/4/2011	32	715	<0.001	<0.001	<0.001	< 0.003	191
	53.98	70.22	5/31/2011	44	821	<0.001	<0.001	<0.001	< 0.003	243
	54.21	70.22	8/29/2011	32	643	<0.001	<0.001	<0.001	<0.003	213
MW-2	54.39	70.22	11/14/2011	28	744	<0.001	<0.001	<0.001	< 0.003	184
	54.39	70.22	2/14/2012	24	818	<0.001	<0.001	<0.001	< 0.003	209
	54.82	70.22	5/23/2012	32	815	<0.001	<0.001	<0.001	<0.003	203
	54.91	70.22	7/13/2012	36	821	<0.001	<0.001	<0.001	< 0.003	214
	55.15	70.22	11/1/2012	72	867	<0.001	<0.001	<0.001	<0.003	198

	55.32	70.22	2/8/2013	28	748	<0.001	<0.001	<0.001	<0.003	177
MW-2	55.43	70.22	5/22/2013	40	783	<0.001	<0.001	<0.001	<0.003	206
IVIVV-Z	55.28	70.22	9/3/2013	28	686	<0.001	<0.001	<0.001	< 0.003	131
	55.54	70.22	11/11/2013	28	721	<0.001	< 0.001	< 0.001	< 0.003	155

								Ethyl	Total	
	Depth to			Cl	TDS	Benzene	Toluene	Benzene	Xylenes	Sulfate
MW	Water	Total Depth	Sample Date				(mg/L)			
	52.33	70.2	12/28/2010	140	804	<0.001	<0.001	<0.001	<0.003	134
	52.55	70.23	3/4/2011	80	687	<0.001	<0.001	<0.001	<0.003	97
	52.96	70.23	5/31/2011	80	632	<0.001	< 0.001	<0.001	< 0.003	94.3
	53.17	70.23	8/29/2011	84	685	<0.001	<0.001	<0.001	<0.003	93.8
	53.34	70.23	11/14/2011	72	708	<0.001	< 0.001	<0.001	< 0.003	93.2
	53.58	70.23	2/14/2012	85	753	<0.001	< 0.001	<0.001	< 0.003	99.5
MW-3	53.75	70.23	5/23/2012	76	705	<0.001	<0.001	<0.001	<0.003	92.6
	53.84	70.23	7/13/2012	60	766	<0.001	< 0.001	< 0.001	< 0.003	91.8
	54.14	70.23	11/1/2012	76	783	<0.001	<0.001	<0.001	<0.003	88.3
	55.27	70.23	2/8/2013	80	734	<0.001	<0.001	<0.001	<0.003	84
	55.38	70.23	5/22/2013	76	750	<0.001	<0.001	<0.001	<0.003	71.6
	54.17	70.23	9/3/2013	60	683	<0.001	<0.001	<0.001	<0.003	71.9
	54.51	70.23	11/11/2013	48	712	<0.001	< 0.001	<0.001	<0.003	76.4







November 21, 2013

Hack Conder

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: EME JUNCTION G-18

Enclosed are the results of analyses for samples received by the laboratory on 11/14/13 12:46.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/ga/lab accred certif.html.

Cardinal Laboratories is accreditated 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 524.4 Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

Celey D. Keens

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Lab Director/Quality Manager



Analytical Results For:

Rice Operating Company Hack Conder 112 W. Taylor Hobbs NM, 88240 Fax To: (575) 397-1471

(* - 7 - -

Received: 11/14/2013 Sampling Date: 11/11/2013
Reported: 11/21/2013 Sampling Type: Water

Project Name: EME JUNCTION G-18 Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Jodi Henson

Project Location: T19S-R37E-SEC18 G - LEA CTY., NM

Sample ID: MONITOR WELL #1R (H302786-01)

BTEX 8021B	mg/	L	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	< 0.001	0.001	11/20/2013	ND	0.051	103	0.0500	2.69	
Toluene*	< 0.001	0.001	11/20/2013	ND	0.051	102	0.0500	2.24	
Ethylbenzene*	< 0.001	0.001	11/20/2013	ND	0.051	101	0.0500	2.16	
Total Xylenes*	<0.003	0.003	11/20/2013	ND	0.149	99.0	0.150	1.78	
Total BTEX	<0.006	0.006	11/20/2013	ND					
Surrogate: 4-Bromofluorobenzene (PIL	113 %	6 89.5-12	6						
Chloride, SM4500Cl-B	mg/	L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride*	236	4.00	11/19/2013	ND	104	104	100	3.92	
Sulfate 375.4	mg/	L	Analyze	d By: AP					
Analyte	Result Reporting Limit		Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
		10.0	11/10/2012	ND	23.8	119	20.0	0.713	
Sulfate*	77.8	10.0	11/19/2013	ND	25.0	113	20.0	0.713	
Sulfate* TDS 160.1	77.8 mg/			d By: AP	23.0		20.0	0.713	
					BS	% Recovery	True Value QC	RPD	Qualifier

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Analytical Results For:

Rice Operating Company Hack Conder 112 W. Taylor Hobbs NM, 88240

Fax To: (575) 397-1471

Received: 11/14/2013 Sampling Date: 11/11/2013 Reported: Sampling Type: Water 11/21/2013 Project Name: **EME JUNCTION G-18** Sampling Condition: Cool & Intact Sample Received By: Jodi Henson Project Number: NONE GIVEN

Project Location: T19S-R37E-SEC18 G - LEA CTY., NM

Sample ID: MONITOR WELL #2 (H302786-02)

mg/	L	Analyze	d By: MS					
Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<0.001	0.001	11/20/2013	ND	0.051	103	0.0500	2.69	
<0.001	0.001	11/20/2013	ND	0.051	102	0.0500	2.24	
<0.001	0.001	11/20/2013	ND	0.051	101	0.0500	2.16	
<0.003	0.003	11/20/2013	ND	0.149	99.0	0.150	1.78	
<0.006	0.006	11/20/2013	ND					
112 %	6 89.5-12	6						
mg/	L	Analyze	d By: AP					
Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
28.0	4.00	11/19/2013	ND	104	104	100	3.92	
mg/	L	Analyze	d By: AP					
Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
155	25.0	11/19/2013	ND	23.8	119	20.0	0.713	
	_	Anabas	d Byr AD					
mg/	L	Anaiyze	u by. AP					
mg/ Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
	Result <0.001 <0.001 <0.003 <0.006 112 % mg/ Result 28.0 mg/ Result 155	<0.001	Result Reporting Limit Analyzed <0.001	Result Reporting Limit Analyzed Method Blank <0.001	Result Reporting Limit Analyzed Method Blank BS <0.001	Result Reporting Limit Analyzed Method Blank BS % Recovery <0.001	Result Reporting Limit Analyzed Method Blank BS % Recovery True Value QC < 0.001	Result Reporting Limit Analyzed Method Blank BS % Recovery True Value QC RPD <0.001

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Analytical Results For:

Rice Operating Company Hack Conder 112 W. Taylor Hobbs NM, 88240

Fax To: (575) 397-1471

Received: 11/14/2013 Sampling Date: 11/11/2013 Reported: Sampling Type: Water 11/21/2013 Project Name: **EME JUNCTION G-18** Sampling Condition: Cool & Intact Sample Received By: Project Number: NONE GIVEN Jodi Henson

Project Location: T19S-R37E-SEC18 G - LEA CTY., NM

Sample ID: MONITOR WELL #3 (H302786-03)

BTEX 8021B	mg/	L	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.001	0.001	11/20/2013	ND	0.051	103	0.0500	2.69	
Toluene*	< 0.001	0.001	11/20/2013	ND	0.051	102	0.0500	2.24	
Ethylbenzene*	< 0.001	0.001	11/20/2013	ND	0.051	101	0.0500	2.16	
Total Xylenes*	<0.003	0.003	11/20/2013	ND	0.149	99.0	0.150	1.78	
Total BTEX	<0.006	0.006	11/20/2013	ND					
Surrogate: 4-Bromofluorobenzene (PID	113 %	6 89.5-12	6						
Chloride, SM4500Cl-B	mg/	L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride*	48.0	4.00	11/19/2013	ND	104	104	100	3.92	
Sulfate 375.4	mg/	L	Analyze	d By: AP					
Analyte	Result Reporting Limit		Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Sulfate*	76.4 10.0		11/19/2013	ND	23.8	119	20.0	0.713	
TDS 160.1	mg/	L	Analyze	d By: AP					
Analyte	Result Reporting Limit		Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
TDS*	712	5.00	11/21/2013	ND	256	107	240	5.56	

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Notes and Definitions

ND Analyte NOT DETECTED at or above the reporting limit

RPD Relative Percent Difference

** Samples not received at proper temperature of 6°C or below.

*** Insufficient time to reach temperature.

- Chloride by SM4500Cl-B does not require samples be received at or below 6°C

Samples reported on an as received basis (wet) unless otherwise noted on report

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LAB# (LAB USE ONLY H 3027%	FIELD CODE	(G)rab or (C)omp	(G)rab or (C)omp # CONTAINERS WATER SOIL AIR SLUDGE								H₂SO₄	ICE (1-1Liter HDPE)	NONE	DATE (2013)	TIME	MTBE 8021B/602	BTEX 8021B/602	TPH 418.1/TX1005 / TX1005 Extended (C35)	PAH 8270C	TCLP Metals Ag As Ba Cd Cr Pb Se Hg 60105/200./	rcl P Volatiles	TCLP Semi Volatiles	TCLP Pesticides	RCI	GC/MS Vol. 8260B/624	GC/MS Semi. Vol. 8270C/625	PCB's 8082/608	Pesticides 8081A/608	Moisture Content	Cations (Ca, Mg, N	Anions (Cl, SO4, CO3, HCO3)	Sulfates	otal Dissolved Sol	Union Around Time ~ 24 Hours	Will Allowing Lilling
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