

REPORTS

DATE:

12-16-11

Rice Environmental Consulting & Safety

P.O. Box 5630 Hobbs, NM 88241 Phone 575.393.4411 Fax 575.393.0293

CERTIFIED MAIL RETURN RECIEPT NO. 7008 1140 0001 3070 6068

December 16th, 2011

Mr. Edward Hansen

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

DEC 20 A

RE: Corrective Action Plan Report on the Vadose Zone Remediation **Rice Operating Company – EME SWD System** EME jct. K-8-1 (1R427-316): UL/K sec. 8 T20S R37E (formerly EME jct. N-8-1)

Mr. Hansen:

RICE Operating Company (ROC) has retained Rice Environmental Consulting and Safety (RECS) to address potential environmental concerns at the above-referenced site in the 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 was previously referred to as the EME jct. N-8-1. However, GIS mapping shows the site to be located within unit letter K (Figure 1). To reflect the geographical location of the site, the name has been changed to the EME jct. K-8-1. All correspondences will reference EME jct. K-8-1.

Background and Previous Work

The site is located approximately 3 miles south of Monument, New Mexico at UL/K sec. 8 T20S R37E as shown on the Site Location Map (Figure 2). Groundwater at this site is located at 27 +/- feet bgs.

In 2009, ROC initiated work on the former EME K-8-1 junction. The site was delineated using a backhoe to form a 30 ft x 20 ft x 12 ft deep excavation and soil samples were screened at regular intervals for both hydrocarbons and chlorides. From the excavation, the four-wall composite, the bottom composite and the backfill were taken to a commercial laboratory for analysis. Laboratory tests of the four-wall composite showed a chloride reading of 256 mg/kg, negligible gasoline range organics (GRO) readings and a diesel range organics (DRO) reading of 489 mg/kg. The bottom composite showed a

chloride laboratory reading of 208 mg/kg, negligible GRO and a DRO reading of 349 mg/kg. Clean soil was imported to the site, blended with soil from the excavation and backfilled into the excavation. Laboratory analysis of the blended backfill showed a chloride reading of 144 mg/kg, negligible GRO and a DRO reading of 232 mg/kg. To further investigate the site, a soil bore was advanced on November 12th, 2009, 25 feet south of the source. The boring was advanced to 24 ft bgs and samples were taken every two feet. The samples were field tested for both chlorides and hydrocarbons. The 18 ft and 24 ft samples were taken to a commercial laboratory to be analyzed. Both samples showed negligible chloride readings. However, GRO and DRO were slightly elevated in both samples and, while benzene was non-detect in both samples, toluene, ethyl-benzene, and total xylenes were detected. The bore hole was plugged with bentonite to the ground surface.

The area was contoured to the surrounding landscape, seeded, and an identification plate was placed on the surface of the site to mark its location for future environmental considerations. NMOCD was notified of potential groundwater impact on December 18th, 2009, and a junction box disclosure report was submitted to NMOCD with all the 2009 junction box closures and disclosures.

As part of the Investigation and Characterization Plan approved by NMOCD on May 19th, 2011, five soil bores (SB-2 through SB-6) were advanced through the former junction box site on May 24th, 2011. RECS personnel field tested the soil for chlorides and screened in the field with a photo-ionization detector (PID) for hydrocarbons. Representative samples from the bores were taken to a commercial laboratory for confirmation of chloride and hydrocarbon field numbers. Laboratory readings showed chloride numbers ranging from a high of 1,420 mg/kg at 6 ft bgs in SB-3 to a low of 240 mg/kg at 24 ft bgs in SB-2. Laboratory readings for GRO showed non-detect in all soil bores except in SB-2 at 21 ft bgs, where the GRO reading was 78.5 mg/kg. DRO readings ranged from a high of 1,110 mg/kg at 3 ft bgs in SB-2 to a low of non-detect at 6 ft bgs in SB-3, at the surface and 6 ft bgs in SB-4, and throughout SB-5. SB-2 at 21 and 24 ft bgs and SB-6 at 21 and 24 ft bgs had PID readings over 100 ppm and were taken to a commercial laboratory for BTEX analysis. Laboratory analysis showed benzene readings from both soil bores to be non-detect. However, toluene readings ranged from a high of 0.45 mg/kg at 21 ft in SB-2 to a low of 0.274 mg/kg at 24 ft in SB-6. Ethylbenzene ranged from a high of 0.796 mg/kg at 21 ft bgs in SB-6 to a low of 0.29 mg/kg at 24 ft in SB-2. Finally, total xylenes ranged from a high of 5.54 at 21 ft bgs in SB-6 to a low of 1.83 at 24 ft bgs in SB-2.

On July 6th, 2011, surface samples were collected from a point 5 ft beyond SB-2, SB-3, and SB-4. Field screening of the 35 ft south surface sample yielded a chloride concentration of 59 mg/kg and a PID reading of 0.0 ppm. The 17 ft west surface sample yielded a chloride concentration of 454 mg/kg and a PID reading of 0.0 ppm, and the 19 ft north surface sample yielded a chloride concentration of 89 mg/kg and a PID reading of 0.0 ppm.

On July 15th, 2011, ROC submitted an ICP Report and Corrective Action Plan (CAP) to NMOCD which was approved on August 18th, 2011. In the ICP Report and CAP, ROC proposed a vadose zone remedy that entailed placing a 20-mil reinforced poly liner measuring 42 ft x 58 ft at 5-4 ft bgs. The soils placed above the liner would have a laboratory chloride reading no greater than 500 mg/kg and a field PID measurement below 100 ppm. Excavated soil would be evaluated for use as backfill, and any soil requiring disposal would be properly disposed of at a NMOCD approved facility. In addition, ROC proposed to delineate groundwater quality by placing a near-source monitor well and an up gradient monitor well at the site and sampling these two wells quarterly.

Vadose Zone Remediation

Beginning October 3, 2011, the site was excavated to approximately 42 ft x 58 ft x 5 ft deep and the bottom of the excavation was padded with 6 inches of imported blow sand to protect the liner from punctures. A 20-mil reinforced plastic liner was installed and properly seated at approximately 4.5 ft bgs (Figure 3). An additional 6 inches of blow sand was used to pad the top of the liner. The imported blow sand used to pad the liner was screened in the field for hydrocarbons with a photo-ionization detector (PID) and resulted in a PID reading of 0.5 ppm (Appendix A). The composite sample was then taken to a commercial laboratory for analysis of chlorides and resulted in a chloride reading of non-detect (Appendix B).

A total of 156 yards of the excavated soil was taken for disposal at an NMOCD approved facility. The remaining soil was blended on site to use as backfill. The blended soil was tested for hydrocarbons using a PID meter with a result of 2.5 ppm (Appendix A). The composite sample was then taken to a commercial laboratory for analysis of chlorides and returned a chloride reading of 192 mg/kg (Appendix B). The excavation was backfilled up to 6 inches bgs with the blended, excavated soil. Since the site is located next to a lease road and lease pad, the site was topped with 6 inches of imported caliche (72 yards) and seeding was not required. Photo documentation of these activities will be found in Appendix C.

Monitor Well Installation

On August 29th, 2011, RECS personnel were on site to install the near-source and up gradient monitor wells (Figure 4). The up gradient monitor well, MW-2, was field tested for chlorides and screened in the field for hydrocarbons. Two samples from MW-2 were taken to a commercial laboratory for confirmation of field numbers (Appendix D). Laboratory readings for the 15 ft sampled returned a chloride result of 464 mg/kg and GRO and DRO readings of non-detect. Laboratory readings for the 25 ft sample returned a chloride reading of 192 mg/kg and GRO and DRO readings of non-detect. These laboratory chloride and hydrocarbon numbers accurately reflect background soil concentrations near the site.

Since their installation, the monitor wells have been sampled twice. MW-2, the up gradient well, has chlorides coming onto the site averaging 670 mg/kg. MW-1, the near-source well has an average chloride reading of 990 mg/kg. RECS recommends that the monitor wells be sampled two more quarters prior to submitting a remedy for the groundwater. This will give ROC time to accurately delineate groundwater quality. Once this delineation is completed, ROC will submit a groundwater remedy to NMOCD which will include a chloride mass calculation and a groundwater extraction plan.

RECS appreciates the opportunity to work with you on this project. Please call Hack Conder at (575) 393-9174 or me if you have any questions or wish to discuss the site.

Sincerely,

Lara Weinheimer Project Scientist RECS (575) 441-0431

Attachments:

Figure 1 – Geographical Location Map

Figure 2 – Site Location Map

Figure 3 – NMOCD Approved Liner

Figure 4 – Monitor Well Installation and MW Sampling Data

Appendix A – PID Sheets

Appendix B - Imported Sand and 8 pt. Composite Lab Confirmation

Appendix C – Photo-documentation

Appendix D – Monitor Well Installation Logs and Lab Confirmation



Figures

Geographical Location Map



Site Location Map



NMOCD Approved Liner



Monitor Well Installation and MW Sampling Data



Appendix A PID Sheets

RICE ENVIRONMENTAL CONSULTING & SAFETY

122 West Taylor Hobbs, NM 88240 PHONE: (505) 393-9174 FAX: (505) 397-1471 PID METER CALIBRATION & FIELD REPORT FORM



MODEL: PGM 7300	SERIAL NO: 590-000508
MODEL: PGM 7300	SERIAL NO: 590-000504
MODEL: PGM 7320	SERIAL NO: 592-903318
MODEL: PGM 7300	SERIAL NO: 590-000183
MODEL: PGM 7600	SERAIL NO: 110-013744
GAS COMPOSITION:	ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 930360

EXPIRATION: 5/24/2013

METER READING ACCURACY: 100

ACCURACY : +/- 2%

COMPANY	
Rice Operating Company	

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	Jct K-8-1	K	8	205	37E

SAMPLE ID	PID	SAMPLE ID	PID
Imported Blow Sand Wallach	0.5		
8 Point Composite Backfill	2.5	· · · · · · · · · · · · · · · · · · ·	
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I verify that I have calibrated the above instrument in accordance to the manufacture operation manual.

SIGNATURE: Kyle Non

DATE: 10/4/2011

Appendix B

Imported Sand and 8 pt. Composite Lab Confirmation



October 06, 2011

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

RE: EME K-8-1 JCT (20/37)

Enclosed are the results of analyses for samples received by the laboratory on 10/04/11 16:12.

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 Hydorcarbons

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

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 (V2, V3)

Accreditation applies to public drinking water matrices.

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. Kune

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

Received:	10/04/2011	Sampling Date:	10/04/2011
Reported:	10/06/2011	Sampling Type:	Soil
Project Name:	EME K-8-1 JCT (20/37)	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: IMPORTED BLOW SAND (H102129-01)

Chloride, SM4500CI-B	mg,	/kg	Analyze	d By: AP	•				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	10/05/2011	ND	432	108	400	7.14	

Sample ID: 8 PT. COMP BACKFILL (H102129-02)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	192	16.0	10/05/2011	ND	432	108	400	7.14	

Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whitsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the services.

Celey D. Kune

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Celey D. Keene, Lab Director/Quality Manager



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 SM4500CI-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

Cardinal Laboratories

*=Accredited Analyte

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Celeg D. Kune

Celey D. Keene, Lab Director/Quality Manager

Page 3 of 4

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Appendix C Photo-documentation

EME Jct. K-8-1 (1R427-316) Unit K, Section 8, T-20-S, R-37-E



site prior to excavation, facing south



excavating the site, facing south



exporting excavated soil, facing west



58x42x5 ft deep excavation complete with 6 inches of blow sand, facing north



importing soil, facing west



58x42 ft 20-mil, reinforced liner, facing northeast



installing a 6 inch blow sand pad above the liner, facing north



backfilling the excavation with excavated soil, facing southwest



leveling the site with caliche, facing southwest



backfilling the excavation with excavated soil, facing south



importing caliche, facing south



site complete, facing west

Appendix D Monitor Well Installation Logs and Lab Confirmation

Logger: Driller:			(yle Norm on & Coo		•MW2			REC	5
W	e: ents: Sa vell. The TE	amples well is) = 72	located 2 DRAF	1 1 taken dur 3 ft south	ring the installation of the east from the former junction box site. L. Weinheimer GW = 27 ft	Pro	bject Name: EME jct. K- bject Consulta cation: UL/K t: 32°35'4.167' ng: 103°16'32	ant: REC sec. 8 T2 'N	Well ID: MW-1 SS 20S R37E County: Lea State: NM
Depth (feet)	Chlor field t	and the second se	LAB	PID	Description		Lithology	Well	Construction
SS 5 ft 10 ft 15 ft 20 ft					NO SAMPLES TAKEN			4 in PVC	bentonite seal
25 ft									
30 ft									
35 ft			-						

Depth (feet)	Chloride field tests	LAB	PID	Description	Lithology	Well Construction
		1	5			
	1. 1944					
45 ft						
45 11		S				sand
-						pack
50 ft						
- 45						
55 ft						
				NO SAMPLES TAKEN		
	Sec. 1 and 1					
60 ft						
		Sec. 4				
	1.					
65 ft	and the second					
70 ft						
72 ft						

Logger: Driller:	н	Kyle I arrison &	Norma Coop		MW2			RECS	e
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	100 ft	t northw	vest f	rom the	former junction box site. L. Weinheimer GW = 27 ft	La	t: 32°35'5.177' ng: 103°16'33	"N (County: Lea State: NM
Depth (feet)	Chlorid field tes	de L	АВ	PID	Description		Lithology		onstruction
SS 5 ft	85			1.1	Brown Sand Tanish Brown Sand				
10 ft	181			83.2				2 in PVC	bentonite seal
15 ft	431	4 Gi < Di	CI- 64 RO (10 RO (10)	75.6	Tan Sand				
20 ft	314			43.5					
25 ft	177	1 G	CI- 92 RO :10	57.8		_			
30 ft		DI	RO (10						sand
35 ft					NO SAMPLES TAKEN				Fran
40 ft 42 ft									



September 02, 2011

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

RE: EME K-8-1 JCT (20/37)

Enclosed are the results of analyses for samples received by the laboratory on 08/30/11 8:05.

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 Hydorcarbons

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

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 (V2, V3)

Accreditation applies to public drinking water matrices.

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,

Celez D. Keine

Celey D. Keene Lab Director/Quality Manager



Analytical Results For:

Rice Operati	ng Company
Hack Conde	r
112 W. Tayl	or
Hobbs NM, 8	38240
Fax To:	(575) 397-1471

Received:	08/30/2011	Sampling Date:	08/29/2011
Reported:	09/02/2011	Sampling Type:	Soil
Project Name:	EME K-8-1 JCT (20/37)	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: M W #2 @ 15' (H101832-01)

Result	Reporting Limit	Analyzed						
		Analyzeu	Method Blank	BS .	% Recovery	True Value QC	RPD	Qualifier
464	16.0	08/31/2011	ND	416	104	400	3.77	
mg,	/kg	Analyze	d By: ab					
Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<10.0	10.0	09/01/2011	ND	163	81.5	200	1.53	
<10.0	10.0	09/01/2011	ND	161	80.3	200	2.07	
93.5	% 55.5-15	4						
102	% 57.6-15	8						
	Result <10.0 <10.0 93.5	<10.0 10.0 <10.0 10.0 93.5 % 55.5-15	Result Reporting Limit Analyzed <10.0	Result Reporting Limit Analyzed Method Blank <10.0	Result Reporting Limit Analyzed Method Blank BS <10.0	Result Reporting Limit Analyzed Method Blank BS % Recovery <10.0	Result Reporting Limit Analyzed Method Blank BS % Recovery True Value QC <10.0	Result Reporting Limit Analyzed Method Blank BS % Recovery True Value QC RPD <10.0

Sample ID: M W #2 @ 25' (H101832-02)

Chloride, SM4500CI-B	mg/	/kg	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	192	16.0	08/31/2011	ND	416	104	400	3.77	
TPH 8015M	mg,	/kg	Analyze	d By: ab					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	[′] 10.0	09/01/2011	ND	163	81.5	200	1.53	
DRO >C10-C28	<10.0	10.0	09/01/2011	ND	161	80.3	200	2.07	
Surrogate: 1-Chlorooctane	112	% 55.5-15	4						
Surrogate: 1-Chlorooctadecane	115	% 57.6-15	8	÷					,

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Kune

Celey D. Keene, Lab Director/Quality Manager



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 SM4500CI-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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Celez D. Kune

Celey D. Keene, Lab Director/Quality Manager

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