1R-480

REPORTS

DATE:

10-19-09



CERTIFIED MAIL
RETURN RECIEPT NO. 7099 3400 0017 1737 1865

October 19, 2009

Mr. Edward Hansen New Mexico Energy, Minerals, & Natural Resources Oil Conservation Division, Environmental Bureau 1220 S. St. Francis Drive Santa Fe, New Mexico 87504

RE: Investigation and Characterization Report

EME B-8 Release Site (NMOCD Case No. 1R0480)

T20S-R37E-Section 8, Unit Letter B

Lea County, New Mexico

Mr. Hansen:

On behalf of Rice Operating Company (ROC), Trident Environmental (Trident) is submitting this Investigation and Characterization Report for the above-referenced site in accordance with 19.15.29 NMAC. The investigation demonstrated that the chloride concentration in groundwater at the site is slightly above WQCC standards; however, approximately four more quarters of monitoring data are needed to determine if the cause is due to regional impact from an unknown offsite source(s) and/or if a release from the ROC-operated pipeline contributed to groundwater conditions.

In accordance with the OCD-approved *Investigation and Characterization Plan* (November 30, 2006) to investigate potential groundwater concerns at this site near Monument, one monitoring well (MW-1) installation was completed on March 3, 2009. Groundwater was encountered at approximately 26 feet below ground surface (bgs). The well was developed and sampled for three quarters pursuant to OCD guidelines. A site location map, vadose zone and groundwater monitoring map, lithologic log and well construction diagram, and laboratory analytical reports are attached. The following table summarizes the historical groundwater monitoring results at the site.

Monitoring Well	Sample Date	Depth to Groundwater (feet BTOC)	Chloride (mg/L)	TDS (mg/L)	Benzene (mg/L)	Toluene (mg/L)	Ethylbenzene (mg/L)	Xylene (mg/L)
	03/31/09	30.03	512	1.440	< 0.001	< 0.001	< 0.001	< 0.003
MW-1	05/18/09	30.21	900	2,120	< 0.001	< 0.001	< 0.001	< 0.003
	08/20/09	30.81	960	2,380	< 0.001	< 0.001	< 0.001	< 0.003

After three quarters of groundwater sampling and laboratory analysis, it has been confirmed that chloride and total dissolved solids (TDS) exceed the Water Quality Control Commission (WQCC) standards at the site; however, we cannot conclude the release site contributed to the impact at this time. Groundwater in this area of Monument, New Mexico, has been reported as regionally impacted with chlorides and unusable as early as 1952 (Nicholson and Clebsch, Groundwater Report 6, 1961). The EME B-8 Release site is located approximately 1,600 ft southeast of the EME Jct. N-5 site where regional impact has been confirmed. The exact source of groundwater impact at the site is unknown because of the numerous potential facilities, past and present, located upgradient of the site. Therefore, we propose to continue groundwater sampling of the monitoring well on a quarterly basis. After four more quarters of groundwater sampling, Trident will submit a *Termination Request* if it is determined that the impact is from upgradient regional sources or a *Corrective Action Plan* (CAP) to address any contribution of contaminants of concern from the release.

ROC is the service provider (agent) for the EME Salt Water Disposal System and has no ownership of any portion of the pipelines, wells, or facilities. The EME System is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis. Environmental remediation projects of this magnitude require System Parties AFE approval and work begins as funds are received.

Please feel free to call me at 432-638-8740 or Hack Conder at 575-393-9174, if you have any questions.

Sincerely,

Gilbert J. Van Deventer, REM, PG

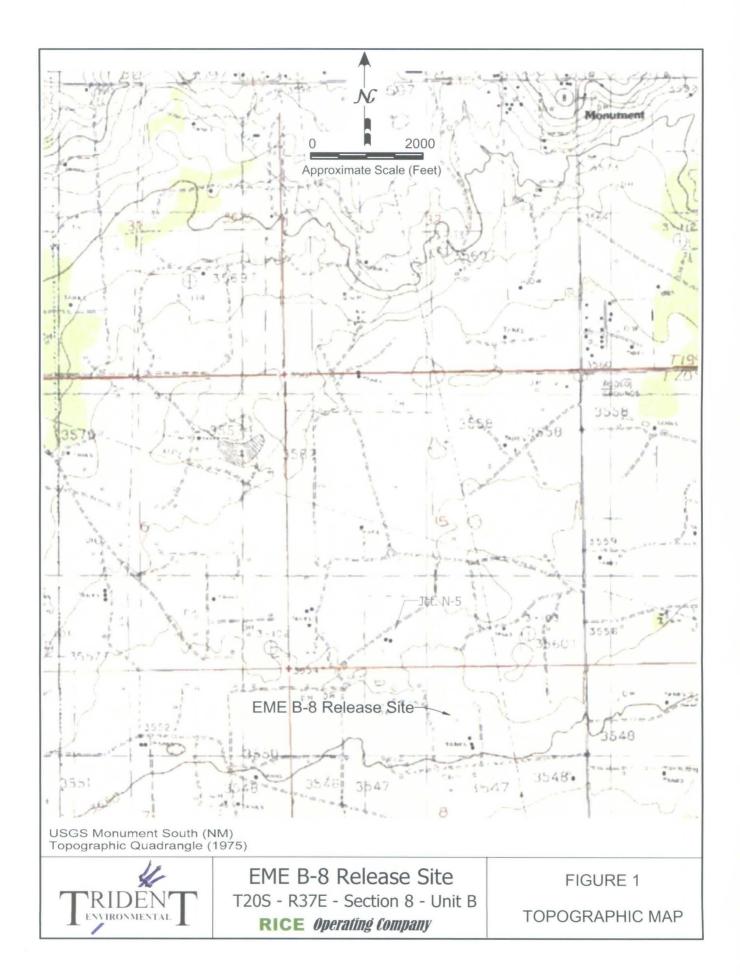
Trident Environmental - Project Manager

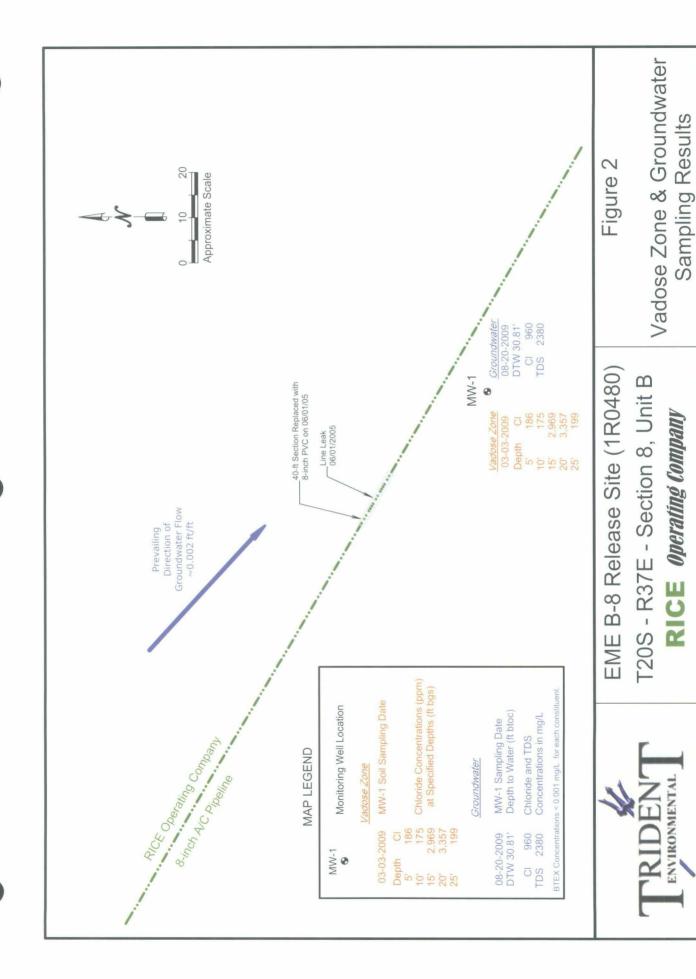
cc: Hack Conder (Rice Operating Co., Hobbs NM))

Larry Hill (NMOCD District 1, Hobbs NM)

enclosures: site location map, vadose zone and groundwater map, lithologic log and well construction diagram, laboratory analytical reports

Figures





Attachment A

Lithologic Logs
And
Monitoring Well Construction Diagrams

LITHOLOGIC LOG AND MONITORING WELL CONSTRUCTION DIAGRAM



 MONITOR WELL NO.:
 MW - 1
 TOTAL DEPTH:
 65 Feet

 SITE ID:
 EME B-8 Line Leak
 CLIENT:
 RICE Operating Company

 CONTRACTOR:
 Harrison & Cooper, Inc.
 COUNTY:
 Lea

 DRILLING METHOD:
 Air Rotary
 STATE:
 New Mexico

 START DATE:
 03/03/09
 LOCATION:
 T20S-R37E-Sec 8-Unit B

 COMMENTS:
 Montaring well located approximately 25 ff coult-page of facility

COMMENTS: Montoring well located approximately 35 ft southeast of leak point.

Photo at left taken near leak point facing southeast.

				Sam	ole	Chloride	PID		LITHOLOGIC PERCEPUATION.
			De	th Time	_	(ppm)	(ppm)	USCS	LITHOLOGIC DESCRIPTION: LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
					Surface				Light brown (5 YR 6/4) sand, medium-grained, rounded/subrounded, well-sorted, dry
		-							
		JOE:							
	D	ŏ	5						Moderate yellowish brown (10YR 5/4) sand, fine to medium-grained, rounded/subrounded, well-sorted, dry
0	Sched 40 PVC Blank Casing	gr	40.000	0920	Split Spoon	186	0.4		
	N. C	e Plu	100					SW	
	Blar	Bentonite Hole Plug			Split				
	VC.	onite	1		Spoon	175	0.3		Pale yellowish brown (10YR 6/2) sand, fine-grained, rounded/subrounded, well-sorted, dry
	40 P	Bent							
	ped	3/8							
	Sch								
	4			0928	Split Spoon	2969	0.3		
			1	5					Very pale orange (10YR 8/2) sand with calcium carbonate (CaCQ) in matrix (20-50%). Sand is very fine-grained, dry.
					Split	2257	0.2	SM/CAL	
			2	0931	Spoon	3357	0.3		Very pale orange (10YR 8/2) sand with calcium carbonate (CaCO3) in matrix (20-50%). Sand is very fine-grained, dry.
									Lab chloride = 5440 mg/kg
									
	10			0935	Split Spoon	199	0.3		Very pale orange (10YR 8/2) and light brown (5YR 6/4) sand, fine-grained, moderately sorted, subarounded, moist.
	Slots		2						
	000							SM	Groundwater encountered at ~26 ft bgs
	hine	~							
5	lac	Pack							
	2.0	Silica Sand Pack	3)					
	.03	ica S		-					
	h 0	ly Sil							
	3	Brady 3						0144	
	Screen with 0.035" Machined Slots	8/16	3	0939				SW	
	Scr								
	ter								
	Diameter								
	Ö		4	0941					
	4		4	0941					
								SC	
				0943				30	
				-					
				0947					

LITHOLOGIC LOG AND MONITORING WELL CONSTRUCTION DIAGRAM



 MONITOR WELL NO.:
 MW - 1
 TOTAL DEPTH:
 65 Feet

 SITE ID:
 EME B-8 Line Leak
 CLIENT:
 RICE Operating Company

 CONTRACTOR:
 Harrison & Cooper, Inc.
 COUNTY:
 Lea

 DRILLING METHOD:
 Air Rotary
 STATE:
 New Mexico

 START DATE:
 03/03/09
 LOCATION:
 T20S-R37E-Sec 8-Unit B

 COMPLETION DATE:
 03/03/09
 FIELD REP.:
 G. Van Deventer

 COMMENTS:
 Montoring well located approximately 35 ft southeast of leak point.

Leak point marked by wood stake near rear wheel of pickup in photo at left.

				Sampl	le	Chloride	PID	USCS	LITHOLOGIC DESCRIPTION:
4	71/4	-	Depth	Time	Туре	(ppm)	(ppm)	0303	LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
nd Pack	4" Screen		55	0949				SW	
8/16 Brady Silica Sand Pack	Sch 40 PVC Blank Casing	8/16 Brady Silica Sand Pack		0951					
1/8	4" Sch 40 PVC		65	0955				SS	
								GP	
			70	1000				CL	
	71/4		75 80 85 90						Total depth of boring at 70 ft bgs but loose gravel caved to fill in bottom 5 ft of open boring. Total depth of monitoring well at 65 ft bgs.

Attachment B

Laboratory Analytical Reports

and

Chain of Custody Documentation



ATTN: HACK CONDER 122 W. TAYLOR

HOBBS, NM 88240 FAX TO: (575) 397-1471

Receiving Date: 08/21/09 Reporting Date: 08/27/09

Project Number: NOT GIVEN

Project Name: EME B-8 LEAK

Project Location: T20S-R37E-SEC8 B~ LEA CO., NM

Sampling Date: 08/20/09 Sample Type: WATER

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: ZL

LAB NUMBER	SAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DAT	E	08/24/09	08/24/09	08/24/09	08/24/09
H18047-1	MONITOR WELL #1	<0.001	<0.001	<0.001	<0.003
Quality Control		0.055	0.052	0.052	0.152
True Value QC		0.050	0.050	0.050	0.150
% Recovery	er zam 1,000 dat die Prinsiphi interneting dat den bestelle den bestel	110	104	104	101
Relative Percen	t Difference	7.4	9.1	10.1	9.8

METHOD: EPA SW-846 8021

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

Chemist

Date



ATTN: HACK CONDER 122 WEST TAYLOR HOBBS, NM 88240 FAX TO: (575) 397-1471

Receiving Date: 08/21/09 Reporting Date: 08/25/09

Project Number: NOT GIVEN
Project Name: EME B-8 LEAK

Project Location: T20S-R37E-SEC8 B ~ LEA CO., N.M.

Sampling Date: 08/20/09 Sample Type: WATER

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: HM

CI

LAB NO. SA

SAMPLE ID

SO₄

02/30/07

TDS

(mg/L) (mg/L)

(mg/L)

Analysis Date:		08/24/09	08/24/09	08/24/09
H18047-1	MONITOR WELL #1	960	180	2,380

		MPP. Also alder CNPEC of ACCOMMENSA and Association and association on tradeous Adults of a complete design of the		

# 20 PPS **********************************				
		and the second s	**************************************	
Quality Contro	•	500	38.3	NF
True Value Q0		500	40.0	NR
% Recovery		100	95.8	NR
Relative Perce	ent Difference	< 0.1	4.3	10.4

METHOD: Standard Methods, EPA 4500-CIB 375.4 160.1

Not accredited for chloride, sulfate and TDS.

Chemist/

Date

H18047 RICE

Turn Around Time ~ 24 Hours Chlorides CHAIN-OF-CUSTODY AND ANALYSIS REQUEST **Total Dissolved Solids** Sulfates Anions (CI, SO4, CO3, HCO3) Additional Fax Number: Cations (Ca, Mg, Na, K) Moisture Content Iweinheimer@riceswd.com **Hq** ,22T ,008 hconder@riceswd.com Pesticides 8081A/608 ANALYSIS REQUEST (Circle or Specify Method No.) BCB.# 8085\608 GC/MS Semi. Vol. 8270C/625 BC/WR API: 8590B/854 ဍ ဍ BCI LAB Order ID # TCLP Pesticides TCLP Semi Volatiles Yes Yes TCLP Volatiles TCLP Metals Ag As Ba Cd Cr Pb Se Hg Total Metals Ag As Ba Cd Cr Pb Se Hg 6010B/200.7 Email Results to: PAH 8270C Phone Results Fax Results REMARKS TPH 418.1/TX1005 / TX1005 Extended (C35) B1EX 80218/602 MTBE 8021B/602 11:45 SAMPLING TIME Rozanne Johnson (575)631-9310 (575)397-1471 rozanne@valornet.com 8-20 (2009) **BTAG** Cardinal Laboratories, Inc. Street, City, Zip) NONE PRESERVATIVE METHOD CHECKED BY: СЕ (1-1Гле нове) 122 W Taylor Street - Hobbs, New Mexico 88240 8/21/69 (Initials) OS2H OSHEN ^EONH RICE Operating Company HCL (2 40ml voA) (Laboratory Staff SCUDGE <u>ब</u>हु 575) 393-9174 AIR Yes TIOS (575)397-1471 48 **NATER** Sample Condition Received By Received by: # CONTAINER® Yes ş T20S-R37E-Sec8 B ~ Lea County - New Mexico qmo(O) to det(O) O Fax # 11.6 EME B-8 Leak 122 W Taylor Street ~ Hobbs, New Mexico 88240 Sampler - UPS - Bus - Other: FIELD CODE Project Name; RICE Operating Company Monitor Well #1 Date: (Circle One) (Street, City, Zip) 101 East Marland - Hobbs, New Tel (575) 393-2326 Fax (575) 393-2476 (575) 393-9174 roject #: Mexico 88240 Hack Conder Rozanne Udhrsof Relinquighted by Relinquished by: Company Name: roject Manager: roject Location Delivered By: LAB USE 18047 LAB# ONLY Address: Cone #:



ATTN: HACK CONDER

122 W. TAYLOR HOBBS, NM 88240

FAX TO: (575) 397-1471

Receiving Date: 04/03/09

Reporting Date: 04/07/09

Project Number: NOT GIVEN

Project Name: EME B-8 LEAK

Project Location: T20S-R37E-SEC8 B~ LEA CO., NM

Sampling Date: 03/31/09

Sample Type: WATER

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: ZL

LAB NUMBEF SAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE	04/06/09	04/06/09	04/06/09	04/06/09
H17186-1 MONITOR WELL #1	<0.001	<0.001	<0.001	<0.003
Quality Control	0.048	0.048	0.047	0.144
True Value QC	0.050	0.050	0.050	0.150
% Recovery	96.0	96.0	94.0	96.0
Relative Percent Difference	2.3	1.4	1.5	<1.0

METHOD: EPA SW-846 8021 B

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE,

AND TOTAL XYLENES.

Chemist

<u>04/07/09</u> Date



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

Receiving Date: 04/03/09 Reporting Date: 04/07/09

Project Number: NOT GIVEN

Project Name: EME B-8 LEAK

Relative Percent Difference

Project Location: T20S R37E SEC 8 B ~ LEA CO., NM

Sampling Date: 03/31/09 Sample Type: WATER

Sample Condition: COOL & INTACT

< 0.1

Sample Received By: ML

Analyzed By: TR

		CI	SO ₄	TDS
LAB NO.	SAMPLE ID	(mg/L)	(mg/L)	(mg/L)
Analysis Date:		04/03/09	04/03/09	04/03/09
H17186-1	MONITOR WELL #1	512	136	1,440

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e <mark>Managara mana</mark> ngan panggarangan panggaran na Panggarangan panggarangan panggarangan panggarangan panggarangan				
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Quality Control		500	41.8	NR
True Value QC		500	40.0	NR
% Recovery		100	105	NR

ye comes made after many management and come and another many many many many many many many many	services where an approximation of the service of t	
METHOD: Standard Methods, EPA	4500-CLB	3754 1601
MILTIOD. Clandald Monoco, LIA	7000 010	373.7

<u>Alorlos</u>

< 0.1

< 0.1

H17186 RICE



ANALYTICAL RESULTS FOR RICE OPERATING COMPANY ATTN: HACK CONDER 122 WEST TAYLOR HOBBS, NM 88240

FAX TO: (575) 397-1471

Receiving Date: 05/20/09
Reporting Date: 05/27/09
Project Number: NOT GIVEN

Project Number: NOT GIVEN Project Name: EME B-8 LEAK

Project Location: T20S-R37E-SEC8 B ~ LEA CO., NM

Sampling Date: 05/18/09 Sample Type: WATER

Sample Condition: COOL & INTACT

Sample Received By: ML Analyzed By: AB/CK/HM

		CI	SO₄	TDS
LAB NO.	SAMPLE ID	(mg/L)	(mg/L)	(mg/L)

Analysis Date	:	05/22/09	05/22/09	05/22/09
H17468-1	MONITOR WELL #1	900	148	2,120

	200	half hilbertonia' garanteer ann ann an taitheachar a chairlean Mariannaide deilein.		····

8.238800**********************************				
Quality Contro	ol	490	41.6	NR
True Value Q		500	40.0	NR
% Recovery		98.0	104	NR
	ent Difference	2.0	1.7	0.3

METHOD: Standard Methods, EPA 4500-CIB 375.4 160.1

My J. Melly

Date

H17468 RICE



ATTN: HACK CONDER

122 W. TAYLOR HOBBS, NM 88240

FAX TO: (575) 397-1471

Receiving Date: 05/20/09 Reporting Date: 05/26/09

Project Number: NOT GIVEN

Project Name: EME B-8 LEAK

Project Location: T20S-R37E-SEC8 B~ LEA CO., NM

NOI GIVEN

Sampling Date: 05/18/09 Sample Type: WATER

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: ZL

LAB NUMBEISAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE	05/22/09	05/22/09	05/22/09	05/22/09
H17468-1 MONITOR WELL #1	<0.001	<0.001	<0.001	<0.003
Quality Control	0.048	0.057	0.053	0.163
True Value QC	0.050	0.050	0.050	0.150
% Recovery	96.0	114	106	109
Relative Percent Difference	14.5	15.1	11.8	10.5

METHOD: EPA SW-846 8021 B

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE,

AND TOTAL XYLENES

Chemist,

Date

05/26/09

101 East Marta Maxim	101 East Martand - Hobbs, New Marier Reading		- 4		7	ì	•	1)	,				CHAIN-OF-CUSTODY	Q Z	J J	STC	י אם	AND	ANG	LYS	IIS R	ANALYSIS REQUEST	EST		
Tei (575) Fax (575)	Tol (573) 393-226 CAFCHIAI LADOFALOFIES, INC. Fox (575) 393-2476	7	# 	5	<u>7</u>	5	2	ź		نے					3	LAB Order ID #	# Q!						1			
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ANALYTICAL RESULTS FOR RICE OPERATING COMPANY ATTN: HACK CONDER 122 WEST TAYLOR HOBBS, NM 88240 FAX TO: (575) 397-1471

Receiving Date: 03/03/09 Reporting Date: 03/04/09 Project Number: NOT GIVEN

Project Name: EME B-8 LEAK Project Location: EME B-8 LEAK

METHOD: Standard Methods

Analysis Date: 03/04/09 Sampling Date: 03/03/09 Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: ML

Analyzed By: HM

LAB NO.		SAMPLE ID	(n	CI ⁻ ng/kg)
H17003-1	ALERY 1	MW-1 @ 20'	-	5,440
	MA 10 m -	ger ger de deue de de la company de la compa		
			necessity.	, ign access
- v - 1000 -	v · · · · · · · · ·	- der tre information open in som in the restaurable of the section of the sectio		J
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	and the second second is 19900		was or tree	
Quality Cont	rol	oper a mage men eta in la santa arriva eta eta eta eta eta eta eta eta eta et	: :	500
True Value (and the state of t		500
% Recovery		neer geen a state in the state of the state	m) semantin	100
Relative Per	THE VIEW WILL WARRANTED	and the second s		< 0.1

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

Chemist

Date

4500-CIB

H17003 RICE



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ARDINAL LABORATORIES
101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603

(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325)673-7020		
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1-2326	193-2476	
1-2326	(909)	
(505) 393-232	6 FA)	_
(202)	393-232	
	(503)	

Company Name	Company Name: Rice Operating Company		77/8	2.70		ANALYSIS		REQUEST			
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athering in sixting acts accessing and about related in the bustoning	Relinquished By: L. Weinheimer Time;	Rollinguished By:	Delivered By: (Circle One) Sampler - UPS - Bus - Other:

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

NEED SAMPLES BACK, PLEASE