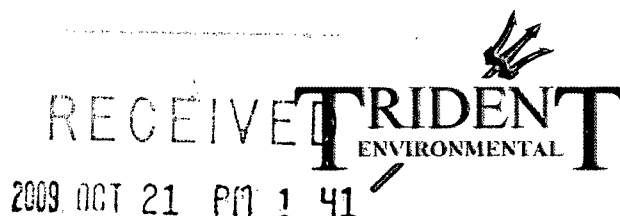


1R - 480

REPORTS

DATE:

10-19-09



CERTIFIED MAIL
RETURN RECEIPT 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)
MW-1	03/31/09	30.03	512	1,440	< 0.001	< 0.001	< 0.001	< 0.003
	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,

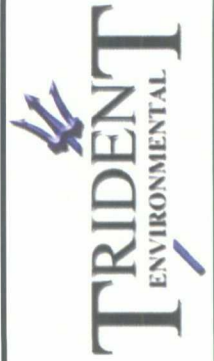
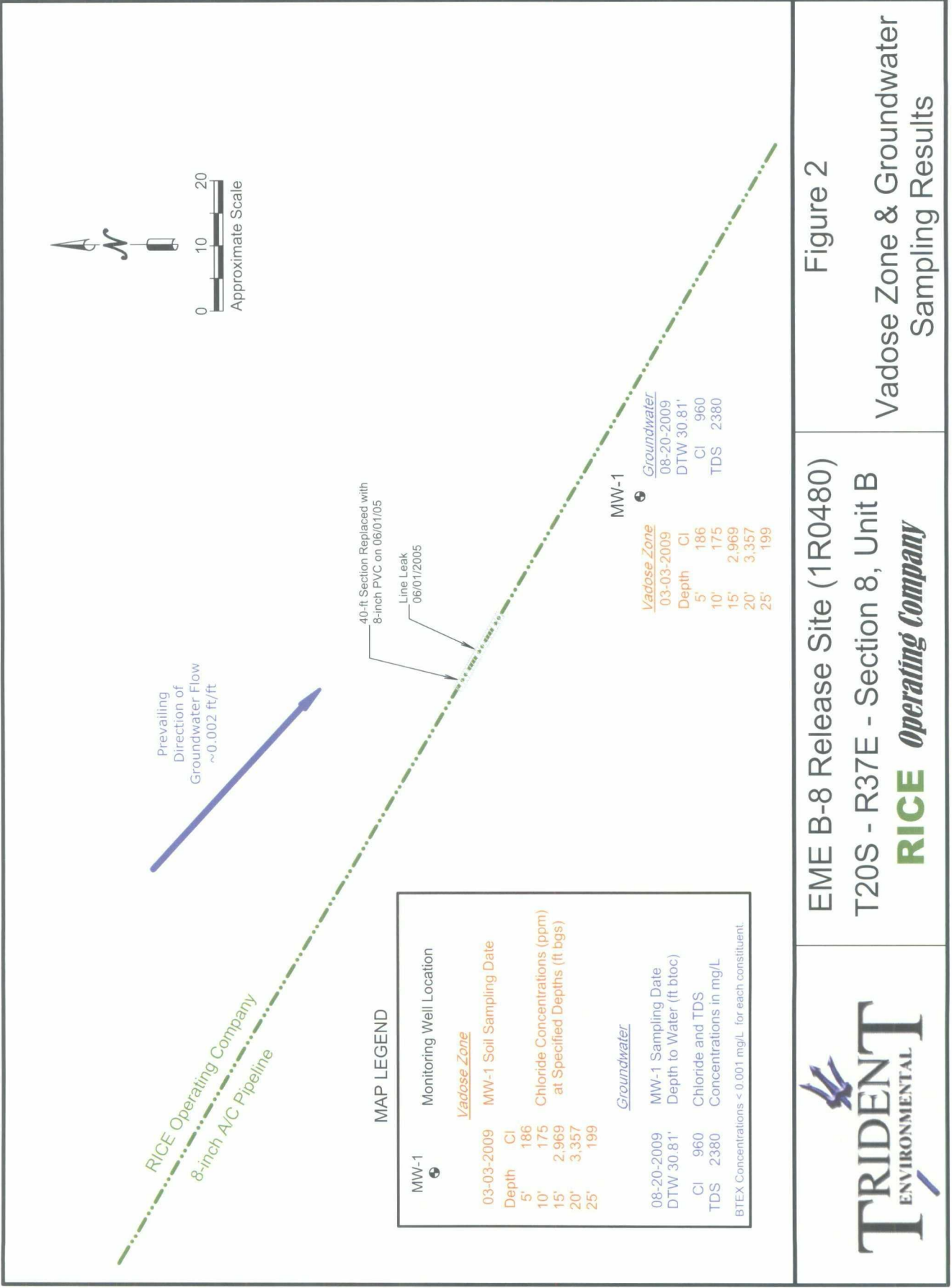


Gilbert J. Van Deventer, REM, PG
Trident Environmental - Project Manager

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



EME B-8 Release Site (1R0480)
 T20S - R37E - Section 8, Unit B
RICE Operating Company

Attachment A

**Lithologic Logs
And
Monitoring Well Construction Diagrams**

LITHOLOGIC LOG AND MONITORING WELL CONSTRUCTION DIAGRAM



MONITOR WELL NO.: MW - 1
 SITE ID: EME B-8 Line Leak
 CONTRACTOR: Harrison & Cooper, Inc.
 DRILLING METHOD: Air Rotary
 START DATE: 03/03/09
 COMPLETION DATE: 03/03/09
 COMMENTS: Monitoring well located approximately 35 ft southeast of leak point.
 Photo at left taken near leak point facing southeast.

TOTAL DEPTH: 65 Feet
 CLIENT: RICE Operating Company
 COUNTY: Lea
 STATE: New Mexico
 LOCATION: T20S-R37E-Sec 8-Unit B
 FIELD REP.: G. Van Deventer

Sample		Chloride	PID	USCS	LITHOLOGIC DESCRIPTION: LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
Depth	Time	Type	(ppm)	(ppm)	
		Surface			Light brown (5 YR 6/4) sand, medium-grained, rounded/subrounded, well-sorted, dry
5				SW	Moderate yellowish brown (10YR 5/4) sand, fine to medium-grained, rounded/subrounded, well-sorted, dry
	0920	Split Spoon	186		
10					Pale yellowish brown (10YR 6/2) sand, fine-grained, rounded/subrounded, well-sorted, dry
	0925	Split Spoon	175		
15				SM/CAL	Very pale orange (10YR 8/2) sand with calcium carbonate (CaCO ₃) in matrix (20-50%). Sand is very fine-grained, dry.
	0928	Split Spoon	2969		
20				SM	Very pale orange (10YR 8/2) sand with calcium carbonate (CaCO ₃) in matrix (20-50%). Sand is very fine-grained, dry. Lab chloride = 5440 mg/kg
	0931	Split Spoon	3357		
25				SM	Very pale orange (10YR 8/2) and light brown (5YR 6/4) sand, fine-grained, moderately sorted, subarounded, moist.
	0935	Split Spoon	199		Groundwater encountered at ~26 ft bgs
30				SW	
	0937				
35				SC	
	0939				
40				SC	
	0941				
45				SC	
	0943				
50				SC	
	0947				

8/16 Brady Silica Sand Pack

4" Diameter Screen with 0.035" Machined Slots

8/16 Brady Silica Sand Pack

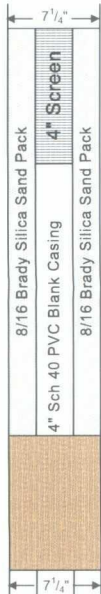
7 1/4"

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: T205-R37E-Sec 8-Unit B
 COMPLETION DATE: 03/03/09 FIELD REP.: G. Van Deventer
 COMMENTS: Monitoring well located approximately 35 ft southeast of leak point.
Leak point marked by wood stake near rear wheel of pickup in photo at left.

Sample				Chloride (ppm)	PID (ppm)	USCS	LITHOLOGIC DESCRIPTION: LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
Depth	Time	Type					
55	0949					SW	
60	0951						
65	0955					SS	
70	1000					GP	
						CL	
							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.
75							
80							
85							
90							
95							
100							



Attachment B

Laboratory Analytical Reports

and

Chain of Custody Documentation



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

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

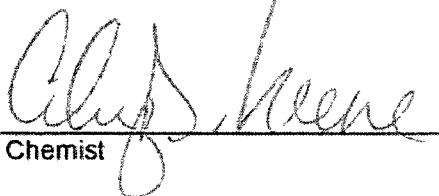
Receiving Date: 08/21/09
Reporting Date: 08/27/09
Project Number: NOT GIVEN
Project Name: EME B-8 LEAK
Project Location: T20S-R37E-SEC8 B~ LEA CO., NM


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 DATE		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		110	104	104	101
Relative Percent 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

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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: 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

LAB NO.	SAMPLE ID	Cl ⁻ (mg/L)	SO ₄ (mg/L)	TDS (mg/L)
Analysis Date:		08/24/09	08/24/09	08/24/09
H18047-1	MONITOR WELL #1	960	180	2,380
Quality Control		500	38.3	NR
True Value QC		500	40.0	NR
% Recovery		100	95.8	NR
Relative Percent Difference		< 0.1	4.3	10.4

METHOD: Standard Methods, EPA	4500-Cl/B	375.4	160.1
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Not accredited for chloride, sulfate and TDS.


Cheryl Keene
Chemist


08/30/09
Date

H18047 RICE

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ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
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 NUMBER 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


Date

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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: 04/03/09
Reporting Date: 04/07/09
Project Number: NOT GIVEN
Project Name: EME B-8 LEAK
Project Location: T20S R37E SEC 8 B ~ LEA CO., NM

Sampling Date: 03/31/09
Sample Type: WATER
Sample Condition: COOL & INTACT
Sample Received By: ML
Analyzed By: TR

LAB NO.	SAMPLE ID	Cl ⁻ (mg/L)	SO ₄ (mg/L)	TDS (mg/L)
Analysis Date:		04/03/09	04/03/09	04/03/09
H17186-1	MONITOR WELL #1	512	136	1,440
Quality Control		500	41.8	NR
True Value QC		500	40.0	NR
% Recovery		100	105	NR
Relative Percent Difference		< 0.1	< 0.1	<0.1
METHOD: Standard Methods, EPA		4500-Cl ⁻ B	375.4	160.1

Chemist

Date

H17186 RICE

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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: 05/20/09
Reporting Date: 05/27/09
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

LAB NO.	SAMPLE ID	Cl ⁻ (mg/L)	SO ₄ (mg/L)	TDS (mg/L)
Analysis Date:		05/22/09	05/22/09	05/22/09
H17468-1	MONITOR WELL #1	900	148	2,120
Quality Control		490	41.6	NR
True Value QC		500	40.0	NR
% Recovery		98.0	104	NR
Relative Percent Difference		2.0	1.7	0.3

METHOD: Standard Methods, EPA	4500-Cl ⁻ B	375.4	160.1
-------------------------------	------------------------	-------	-------

Chemist

Date 05/27/09

H17468 RICE

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ANALYTICAL RESULTS FOR
RICE OPERATING COMPANY
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


Sampling Date: 05/18/09
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 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

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, 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 services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



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

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	CF ⁻ (mg/kg)
H17003-1	MW-1 @ 20'	5,440
Quality Control		500
True Value QC		500
% Recovery		100
Relative Percent Difference		< 0.1

METHOD: Standard Methods

4500-CIB

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

Chemist

Date _____

H17003 RICE

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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

Company Name: <u>Rice Operating Company</u>		P.O. #:		Company:		Attn:		Address:		City:		State:		Zip:		Phone #:		Fax #:			
Project Manager: <u>Hack Conder</u>		State: <u>NM</u>		Zip: <u>88240</u>		Attn:		Address:		City:		State:		Zip:		Phone #:		Fax #:			
Address: <u>122 West Taylor</u>		City: <u>Hobbs</u>		State: <u>NM</u>		Zip: <u>88240</u>		Attn:		Address:		City:		State:		Zip:		Phone #:		Fax #:	
Phone #:		Fax #:		Project Owner:		Project Name:		Project Location:		Sampler Name:		Lab I.D.		Sample I.D.		Project #:		Project Name:		Project Location:	
Project #:		Project Name:		Project Location:		Sampler Name:		Lab I.D.		Sample I.D.		Project #:		Project Name:		Project Location:		Sampler Name:		Lab I.D.	
Project Name: <u>EME B-8 16014</u>		Project Location: <u>EME B-8 16014</u>		Sampler Name: <u>Lara Weinheimer</u>		Lab I.D.: <u>H70037</u>		Sample I.D.: <u>MM-1 2-25</u>		Project #:		Project Name:		Project Location:		Sampler Name:		Lab I.D.		Sample I.D.	
FOR LAB USE ONLY		MATRIX		PRESERV		SAMPLING		DATE		TIME		Project #:		Project Name:		Project Location:		Sampler Name:		Lab I.D.	
		GROUNDWATER		ICE / COOL				3-2-25		0:31		Project #:		Project Name:		Project Location:		Sampler Name:		Lab I.D.	
		WASTEWATER		ACID/BASE								Project #:		Project Name:		Project Location:		Sampler Name:		Lab I.D.	
		SOIL		OTHER								Project #:		Project Name:		Project Location:		Sampler Name:		Lab I.D.	
		SLUDGE		OTHER								Project #:		Project Name:		Project Location:		Sampler Name:		Lab I.D.	
		CONTAINERS										Project #:		Project Name:		Project Location:		Sampler Name:		Lab I.D.	
		GRAB OR COMB										Project #:		Project Name:		Project Location:		Sampler Name:		Lab I.D.	
												Project #:		Project Name:		Project Location:		Sampler Name:		Lab I.D.	
												Project #:		Project Name:		Project Location:		Sampler Name:		Lab I.D.	
												Project #:		Project Name:		Project Location:		Sampler Name:		Lab I.D.	
												Project #:		Project Name:		Project Location:		Sampler Name:		Lab I.D.	
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												Project #:		Project Name:		Project Location:		Sampler Name:		Lab I.D.	
												Project #:		Project Name:		Project Location:		Sampler Name:		Lab I.D.	
												Project #:		Project Name:		Project Location:		Sampler Name:		Lab I.D.	

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

NEED SAMPLES BACK, PLEASE