427-163 

## WORKPLANS Addendum

### Date: 2 ~ 26 ~ /0

February 26, 2010

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#### **Corrective Action Plan Addendum Calculation of Chloride Load**

#### ROC EME JR Phillips NMOCD #: 1R427-163

prepared for:

Rice Operating Company 122 West Taylor Hobbs, NM 88240

#### **R.T. Hicks Consultants, Ltd.**

#### R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266-0745

February 26, 2010

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Edward J. Hansen NMOCD Environmental Bureau 1220 South St. Francis Drive Santa Fe, New Mexico 87505 Via E-mail and FedEx

MAR - 3 2010 Environmental Bureau Oil Conservation Division

#### RE: ROC EME JR Phillips Site NMOCD: 1R427-163 Corrective Action Plan Addendum: Calculation of Chloride Load Unit D, Section 6, Township 20S, Range 37E

Mr. Hansen:

In August 2008 we submitted a Corrective Action Plan (CAP) for the above referenced site. This letter is a proposed addendum to that Corrective Action Plan and presents a calculated chloride load for the vadose zone at the site. We propose to complete the remedy proposed in the August CAP and to remove the calculated chloride mass ROC contributed to the vadose zone at the site from ground water at another site nearby.

Our August 2008 Corrective Action Plan concluded:

- Activities at the JR Phillips EOL have not caused constituents of concern (COCs) to enter ground water. Saturated conditions between the surface and ground water never developed at the ROC site.
- The COCs reside in the upper half of the vadose zone.
- Activities in the area near the former EOL have resulted in ambient chloride concentrations of about 1,000 mg/kg in soil.
- The EOL is the source of chloride where soil concentrations are greater than 2,000 mg/kg in soil. The geometry of the hypothesized 2,000 mg/kg isopleths at the site is presented in Plate 4 of our CAP, see Appendix A.
- The JR Phillips site presents no threat to fresh water, public health, or the environment.
- Re-vegetating a 50 foot by 50 foot area centered over the former excavation at the EOL site would reduce infiltration. This remedy is protective of ground water quality, human health, and the environment.

This letter describes our estimate of the mass of chloride the ROC EOL contributed to the vadose zone at this site. We propose to remove the calculated mass by pumping saline water from EME L-6 to maximize environmental benefit of the chloride mass removal effort. This site has a recovery well with a 4" casing (RW-1) that will allow for a high pumping rate. Ground water quality at L-6 allows a minimal removal of water and a high removal of chloride from ground water. This water will be used for line maintenance or put to some other beneficial use.



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#### **Chloride Calculation**

The chloride mass calculation employed at this site uses collected soil data from borings within the known area of disturbance near the junction box: SB -1 and SB-2, drilled in December 2007. The depth to water at the site is approximately 35 feet below ground surface (bgs). These borings extend to 30 feet bgs and chloride data was collected for soil at 5 foot intervals. The observed chloride concentrations in these borings are presented in the lithologic logs provided in Appendix B and shown in table 1.

Denth	SB-1 - Center of	SB-2 - 5' South of		
(ft bas)	source area	source area		
(it bys)	Chloride	e (mg/kg)		
0-12	624	624		
15	653	700		
20	227	418		
25	1010	480		
30	1730	629		

Table 1	Chloride Concentrat	ions Observed in	Soil at 1R Phillins
TUDIC I.	Chionae Concentrat		Sou at Six i humps

The former EOL was excavated in an area 30 feet wide and 30 feet long, a total of 900 ft<sup>2</sup>. The chloride load calculation methodology along with tables showing inputs and results is given in Appendix C. As discussed in the CAP, ROC excavated the site to 12 feet below ground surface and blended soil. The backfill in the excavation had a chloride concentration of 624 mg/kg. A "chloride load" is calculated for each boring. The chloride loads from all borings are averaged to give a chloride load representative of the overall site area. In this case, the chloride load for SB-1 is 13.60 kg/m<sup>2</sup> and 9.92 kg/m<sup>2</sup> for SB-2. A background chloride concentration of 100 mg/kg is assumed and removed from the total estimated contributed chloride in the vadose zone (1.84 kg/m<sup>2</sup>). We estimate that the chloride load in the vadose zone is 829 kg (or 1,829 lbs) of chloride.

#### Recommendation

We propose to remove this chloride mass from ground water at the EME L-6 location (located less than 2,000 feet to the southwest of JR Phillips, see Figure 1). In November 2009, chloride concentrations of 11,200 mg/L were observed in RW-1. We estimate 829 kg of chloride may be removed from this site over the course of about 33 days by pumping 1 gallon per minute approximately 10 hours a day.

Chloride mass at JR Phillips (kg)	Possible Site of Impacted Water Removal	chloride in water to be removed - mg/L	# of gallons to remove	Approximate days needed at 1 gpm for 10 hours/day
829	EME L-6 RW-1	11,200	19,530	33

T-61- 2	Childrental	D			
Table Z.	Chioride	Removal	al EME	L-0	KAA-T

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Re-vegetation efforts will continue as necessary to restore the surface of the site to natural vegetation conditions.

If you have any questions or comments, please do not hesitate to contact us or Hack Conder at Rice Operating Company.

Sincerely, R.T. Hicks Consultants, Ltd.

atie è Lee\_

Katie Lee Project Scientist

Copy: Hack Conder, Rice Operating Company







Phone (575) 393-9174 122 W. Taylor Hobbs, NM 88240 Fax (575) 397-1471

## EME JR Phillips

Legals: UL/D sec.6 T20S R37E NMOCD Case #: 1R427-163 Consultant: R.T. Hicks

## Legals: UL/L sec.6 T20S R37E EME L-6 boot



Drafted by: Lara Weinheimer



#### Appendix A August 2008 Corrective Action Plan

#### R.T. Hicks Consultants, Ltd.

#### August 28, 2008



JR Phillips NMOCD Case #: 1R-427163

**Corrective Action Plan** 

**R.T. Hicks Consultants, Ltd.** 

August 28, 2008

#### JR Phillips NMOCD Case #: 1R-427163

#### **Corrective Action Plan**

prepared for:

Rice Operating Company 122 West Taylor Hobbs, NM 88240

#### **R.T. Hicks Consultants, Ltd.**

#### R. T. HICKS CONSULTANTS, LTD.

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#### Introduction

The JR Phillips site is located southwest of Hobbs, New Mexico in Section 6 of T20S, R37E (see Plate 1). To reach the site from Hobbs, drive:

- 1) West 10.0 miles on US Highway 62 from the junction of US Highway 62 and State Highway 209,
- 2) South about 6.1 miles on County Road 41 (Maddox Road), and
- 3) Southeast about 0.35 miles on dirt roads.

The site was an End of Line (EOL) box with boot in the EME System which was refurbished in 2004 (See Figure 1). In 2004, Rice Operating Company (ROC) excavated and removed the JR Phillips box and a 30-foot by 30-foot area of surrounding soil to a depth of twelve-feet. Junction box characterization activities at the site followed ROC standard practices associated with junction box characterization and closure and the results of this program are presented in Appendix A.

Figure 1. Completed Junction Box, October 2004



At the time of the 2007 investigation, the 30x30x12 foot excavation was filled with a mixture of silt and caliche.

This Corrective Action Plan presents:

- 1) A description of the characterization activities performed by R.T. Hicks Consultants (Hicks Consultants) and ROC at the JR Phillips site in the EME system.
- 2) Evaluations and conclusions drawn from activities performed, and
- 3) A proposal for closure of the site after the selected remedy is implemented.

#### **Characterization Program**

#### Work Elements Performed

Detailed descriptions of the characterization activities performed by ROC and Hicks Consultants are provided in Appendix A.

Plate 2 is an aerial photo of the site when it was active, taken in 1966. Plate 3 shows the locations of the ROC borings, excavation and trenches at the same scale as Plate 2. Plate 3 also shows monitoring wells of Chevron/Texaco. Characterization activities performed included:

- 1) Initial ROC characterization, June 2004: ROC sampled the bottom and walls of the 30x30x12 foot excavation and nine locations within the excavation to a depth of 12 feet below ground surface. As shown on Plate 3, one location is at the center of the former box. One location is 5 feet north of the former box. Two locations each are to the west and to the east: and three locations are south of the former box. ROC conducted field chloride tests in all locations. In addition to field tests within the excavation, two soil samples were submitted for laboratory analyses: a composite from the walls of the excavation and a composite from the floor of the excavation.
- After initial characterization the surface was restored and the site was re-seeded. Excavated soils were blended and backfilled, showing a chloride concentration of 624 mg/kg.
- 3) In December 2007, two soil borings were advanced to a total depth of 30 feet below ground surface. SB-1 was located at the center of the former junction box and SB-2 was placed 15 feet to the south of SB-1.



#### Results

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Tables 1, 2, and 3 present chloride and PID measurements from the sampling locations and excavation in June, 2004 and the 2 soil borings in December, 2007. Appendix A presents laboratory and field data from the characterization activities.

Trench Samples, June 2004									
Location	At Former								
relative to the	Junction	5 feet	5 feet	15 feet	5 feet	15 feet	25 feet	5 feet	15 feet
30' by 30'	Box	North	East	East	South	South	South	West	West
Excavation	(source)								
Depth in feet				Chloride Co	oncentratio	n in mg/kg			
8	2,219	1,319	1,270	809	1,580	3,059	929	1,409	1,769
9	1,709	1,139	1,319	1,349	1,160	2,609	1,349	1,619	1,439
10	2,180	1,379	2,003	2,249	1,469	2,579	1,169	1,649	1,679
11	2,519	779	3,412	2,369	1,709	2,219	1,106	1,679	1,289
12	2,429	659	2,390	2,039	2,039	2,279	743	1,409	1,259
Depth in feet				PID Mea	surements	in ppm			
6	6.5			0.0					
7	27.2			0.0					
8	1.6	0.0	0.0	0.0	0.0	0.0	0.0	42.4	2.7
9	29.5	0.0	0.0	0.0	0.0	0.0	1.4	4.3	1.5
10	2.3	0.0	0.0	59.5	0.0	0.0	0.0	9.1	0.0
11	6.3	0.0	0.0	2.4	0.0	0.0	0.0	5.4	0.0
12	0.0	0.0	0.0	2.3	0.0	0.0	0.0	9.5	0.0

Table 2. Field Results for Chloride and Volatile Organic Constituents in Excavation at Site

Soil Borings, December 2007					
SB-1		SB-2			
Center of Forme Box	r Junction	5 Feet South of Former Junction Box			
Split Spoon Sample Depths in feet	Lab. Chloride (mg/kg)	Grab Sample Depths in feet	Field Chloride (mg/kg)		
15 to 17	653	15	700		
20 to 22	227	20	418		
25 to 27	1,010	25	480		
30 to 32	1,730	30	629		







A		0				
Excavation Samples, June 2004						
Samples from the 30'		PID				
by 30' by 12'	Chloride in	Measurements				
Excavation	mg/kg	in ppm				
4-Wall Composite						
Sample	1,109	2.3				
Composite Sample						
of Excavation Floor	1,079	15.5				
Remedial Backfill						
Material	624	0.0				

Table 3. Comparison of Chloride in Soil Borings 1 and 2

#### **3 Conclusions**

#### 3.1 Activities at the at JR Phillips Junction Box have not caused COC's to Enter Ground Water

From chloride concentration and PID measurement profiles (confirmed by laboratory analysis), Hicks Consultants concludes that saturated conditions between the surface and ground water never developed at the ROC site. The constituents of concern (COC's) reside in the upper half of the vadose zone.

Figure 2 shows chloride concentrations versus depth at the center of the former junction box before the excavation to a depth of 12 feet. Also shown on Figure 2 is the chloride concentration profile that exists at present after filling the excavation with blended fill material (624 mg/kg). Chloride concentration data is from field and laboratory data.

Superimposed on the graphs are transparent shadings varying in intensity with chloride concentration. The yellow shading represents chloride from activities at the site in the upper vadose zone. The orange shading represents chloride in the capillary fringe connected with ground water.



Between these two depth intervals, chloride concentrations decrease from 663 mg/kg (16-feet) to 227 mg/kg at the depth of 21 feet. These low chloride concentrations demonstrate that produced water (which exhibits chloride concentrations in excess of 30,000 mg/L, based upon ROC data) has not migrated through this depth interval and therefore has not entered ground water. Saturated flow of produced water through the vadose zone always leaves a "footprint" of chloride concentrations that typically exceed 1500 mg/kg (see Appendix B).

Below the depth of 21 feet, chloride concentration increases to 1,730 mg/kg at a depth of 31 feet. The water table has risen about 6 feet from 2004 to 2006 at nearby monitoring wells and is now about 35 feet below ground surface. With the accompanying rise of the capillary fringe (the saturated vadose zone connected to ground water), the chloride concentrations in the sample at 31 feet, which we believe is near the capillary fringe, is about twice the chloride concentration measured in ground water.

However, the ground water samples are from wells with a minimum of ten feet of screen below the water table; and are therefore, composite samples over this depth interval. About 900 feet to the southeast is a water well with the top of its 40-foot screen set ten feet below the water table. Groundwater samples from this well have chloride concentrations less than one-fifth that of the monitoring wells, and are representative of this screened interval. These facts suggest that chloride concentration in ground water is higher near the water table and lower near the bottom of the aquifer. Within the ground water-vadose zone interface, the well data and the soil samples suggest that chloride concentration may be about twice that of samples from the monitoring wells. Therefore, chloride concentrations in the capillary fringe are a result of connection with ground water (see Appendix B).

#### 3.2 Activities in the Area have Resulted in Ambient Chloride Concentrations of about 1000 mg/kg

Plate 4 shows the excavated area centered over the EOL and the locations of the characterization trenches. Plotted with each trench is the averaged chloride concentration of the samples obtained at depths of 8, 9, 10, 11, and 12 feet. Isoplaths (contours of constant chloride concentration) are plotted using these data.

Plate 5 presents North-South and East-West cross-sections through the center of the site. Averaged chloride concentrations are shown plotted against lateral distance from the center of the site (placed at (0, 0)). The vertical dashed lines show the limits of the excavated area from the center of the site.

As can be seen from examining both Plates 4 and 5:

- 1) Chloride concentrations are greater than or equal to 1,000 mg/kg at the edges of the excavation.
- 2) Regardless of direction and local topography, none of the averaged chloride concentrations decline below 1,000 mg/kg at the edge of the excavated area.
- 3) The highest chloride concentration encountered is 15 feet south of the junction box (deep vadose chloride concentrations are higher in SB-2 than in SB-1)

Hicks Consultants concludes that:

1) Because the averaged chloride concentrations do not materially decline below 1,000 mg/kg with distance or direction from the EOL, the EOL is not the source of the

1000 mg/kg or greater average chloride concentration observed at the edges of the excavated area.

2) The EOL is the source of chloride where ispleths show concentrations greater than 2000 mg/kg. The geometry of the hypothesized 2000 mg/kg isopleths shown in Plate 4 is consistent with a small surface depression near the EOL.

#### 3.3 The Site presents no threat to Fresh Water, Public Health or the Environment

Past activities in the area resulted in chloride concentrations above 1,000 mg/kg from the surface to a depth of less than 16 feet. ROC removed the soil associated with the former EOL site to a depth of 12 feet. Therefore, the chloride concentration at the former EOL site is less than 1000 mg/kg from 0-12 feet, greater than 1000 mg/kg from 12 feet to 14 feet, and less than 300 mg/kg from 14 feet to the capillary fringe. We conclude that the residual chloride mass is insufficient to pose a threat to fresh water, public health, safety, the environment or property.

Deep borings (SB-1 and SB-2, December, 2007) showed no evidence of hydrocarbon concentrations above 20 mg/kg DRO and ROC trench samples showed all hydrocarbon vapors were less than or equal to 60 ppm. In six of the eight trenches, all hydrocarbon vapors measured below 10 ppm. Because ROC has excavated and removed all soil to a depth of 12 feet, Hicks Consultants concludes that residual hydrocarbons are not present in sufficient concentrations or sufficient mass at the ROC site to represent a threat to fresh water, public health, safety, property or the environment.

#### 4 Recommendation

Hicks Consultants recommends that ROC re-vegetate a 50-foot by 50-foot area centered over the former excavation at the EOL site to reduce infiltration. This remedy is protective of ground water quality, human health, and the environment. Upon documentation of this action, a closure report/request will be submitted to NMOCD.



#### Plates

#### R.T. Hicks Consultants, Ltd.



S:/PROJECTS/ROC/JRPHILLIPS/PLATES/CAP/PLATE1\_DIRECTIONS.MXD



S:/PROJECTS/ROC/JRPHILLIPS/PLATES/CAP/PLATE2\_1966AERIAL.MXD





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#### Appendix A Characterization Program

#### R.T. Hicks Consultants, Ltd.

#### RICE OPERATING COMPANY JUNCTION BOX DISCLOSURE REPORT

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I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY. KNOWLEDGE AND BELIEF.

	Rob Bani SIGNATURE	Allon	COMPANY Curts Environmental-Odessa, TX
REPORT ASSEMBLED BY	Kristin Paris Pope	SIGNATURE Th	din Jamie Pope
DATE	8/9/2009	TITLE	Project Scientist

\* This site is a "DISCLOSURE." It will be placed on a prioritized list of similar sites for further consideration.



# EME J.R. Phillips boot EOL

unit 'D', Sec. 6, T20S, R37E

\$



undisturbed junction box and boot

12/05/2002











CHLORIDE CONCENTRATION CURVE

## RICE Operating Company

100.00

# EME JR Phillips boot EOL

Unit 'D', Sec. 6, 1208, 837E

Vertical Delineation at Saince

CI mpm	o ice	- AOZ-1	. 2180.	6182	62 <b>1</b> (2)
Depth bgs (ft)	80	, Ç	10		<u>e</u> j

Groundwater = 35 ft





PHONE (505) 393 2326 - 101 E. MARLAND - HOBBS; NM 88240

ANALYTICAL RESULTS FOR RICE OPERATING CO. ATTN: RICK ELAM 122 W. TAYLOR HOBBS, NM 88240 FAX TO: (505) 397-1471

FAX TO: (50 Receiving Date: 06/21/04 Reporting Date: 06/22/04 Project Number: NOT GIVEN Project Name: EME JR PHILLIPS TEXACS Project Location: NOT GIVEN



Sampling Date 08/21/04 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: HM Analyzed By: BC/HM

LAB NUMBER SAMPLE ID	GRO (C <sub>6</sub> -C <sub>10</sub> ) (mg/Kg)	DRO (>C <sub>10</sub> -C <sub>28</sub> ) (mg/Kg)	CI* (mg/Kg)
ANALYSIS DATE	06/21/04	06/21/04	06/22/04
H8838-1 12' BOTTOM COMPOSITE	< 10.0	105	1120
H8838-2 WALL COMPOSITE	<10.0	:<10.0	1180
	*		
Quality Control	803	808	1020
True Value QC	800	800	1000
% Recovery	100	101	102
Relative Percent Difference	3,9	1.8	1.0

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI: Std. Methods 4500-CI'B \*Analyses performed on 1:4 w/v aqueous extracts.

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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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Phome: 393	4174 Fax #:					Ac	ldross						********	ور المراجع ال			
Project #:	Project Owner:					Ö	i.			-				*******			
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Cardinal cannot acceptiverbal changes. Please fax written changes to (815) 673-7020.

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#### PHONE (\$25) \$73-7891 + 2111 HEECHWOOD + ARILENE TX 79603

PHONE (605) 383 2326 . 101 E. MAHLAND . HOBES, NM 80240

ANALYTICAL RÉSULTS FOR RICE OPERATING CO ATTN: ROB ELAM 122 W TAYLOR HOBBS, NM 88240 FAX TO: (505) 397-1471

Receiving Date: 06/28/04 Reporting Date: 06/29/04 Project Number: NOT GIVEN Project Name: EME B1-2 - JR PHILLIPS Project Location: EME

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	JUL	Ø	1	2004	U
	AICE HI	می 180	ۍ S	iann NM	6

Sampling Date: 06/25/04 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: HM Analyzed By: BC/HM

	GRO	DRO	
	(C6-C10)	(>C10-C28)	CP
LAB NO. SAMPLE ID	(mg/Kg)	(ing/Kg)	(mg/Kg)

ANALYSIS DATE	06/28/04	06/28/04	06/25/04
H8862-1 EME B1-2, REMED, BACKFILL	<10.0	<10.0	112
H8862-2 EME JR/RHILLIPS REMEDIATE	A<10.0	<10.0 %	<u>624</u> 23
BACKFILL			
and a second			
Quality Control	7.70	<b>9</b> 16	1000
True Value QC	800	800	1000
% Recovery	96.2	102	100
Relative Percent Difference	0.9	3.4	Z.0

METHODS: TPH GRO 8 DRO: EPA SW-846 8015 M; CI: Std. Methods 4500-CI'B \*Analyses performed on 1:4 w/v aqueous extracts.

Date

H8862 XLS

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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST 10 £ \* 0 \* ANALYSIS REQUEST 0 0 0 0 0 U Yus D.Nol 572/20143 108 1 Phone Result For Acoust REVARKS: 16:30 BME 01.7718 ···· 4 SAMPLUNS 1-12 5264 a much trading and search ar sur, soul is brinked (spicer data search) and (spicer data) are the law and the trading and search are search and search are search are search are search are search and are search are sear DATE 219: PRESERV. 2111 Boschwood, Abliens, TX 79803 101 East Martand, Hobbs, NM 88240 . Vario (606) 393-2328 Fax (605) 393-2476 (include) 1000/30 Checker Company Addrase: Phone :: P.O. 9; State: Fax U TSYEMIOY Attn: È City やいためやや - Temps Concident C SHUC arinore RACEIVED BY: (Lab Start) 1. Cardinal capped accept varbal changes. Plasse lax wilten changes to (915) 573-7020. MATRIX no rios 3 MACTEWATER HELYMONION R CONTAINER B 215: Ph. 11205 WOOD BO BYERD er der durch riveren ded is dereint verse unter mehr h. die zustog unde dereigte hans greitent inselent. Inderei inselent inselent inselent inselent inselent die dereigte hand in dereigte hand. Die her dereigte hand die dereigte hand die dereigte hand. Die her dereigte hand die dereigte hand die dereigte hand die dereigte hand. Die her dereigte hand die dereigte hand d (916) 673-7001 Fax (915) 673-7020 and a serie was been a warmed to be the series of the seri ARDINAL LABORATORIES, INC. Ceut Court Project Owner: Ś Slath: Steel 2 12 X0 2 Sample I.D. 2 8-2 North We all RUG ENTIN V. S. Start And in the second  $cb \in Land$ 10 10-00 Sampler - Urs - Bug - Other Project Location 2 11 6 Delivered By: (Circle Circl) Phone 4. 323 49 24 Sampler Pailingule hed. Projections: C. M.C. mine. N and hind your window Rainquished By: ž Address: //2. 1. Project Manager: Sampler Name: CALE R. M. C. Company, Nemo: CIN: 7.6.46 N. FOR LABUE ON UT Labl.D. ENC M Project #:

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#### RICE OPERATING COMPANY 122 WEST TAYLOR HOEBS, NEW MENICO 88240 PHONE: (505) 393-9174 FAIL (505) 397-1471 VOC FIELD TEST REPORT FORM MINTRAE PLUS CLASSIC PROTOIONIZATION GAS DETECTOR

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			רווסח			Air Potany	LOCATION: T-20-S R-37-E Sec 60 (D)
P O Box 762	4					12/21/07	EIELD REP : Dale Littleichn
Midland, IX	/9/08		WELL			Adjacent to let Box	FILED REF. Date Littlejolin Ell E NAME: \ IB Phillins\I ithlogs (12-07)
(432) 320-30	10		VVLLL			Lat 32º 36' 19 2" North Long	103º 17' 41 1" West
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<u>م</u>		15					
li i			spoon	137		Split spoon 15 -17 fe	et (653 ma/ka Cl. 20 ma/ka DRO)
3							
						SILTY SAND Brown to reddish	n brown, medium grain, poorly sorted, sub angula
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			spoon	154		Split spoon 20 -22 fee	et (227 ma/ka Cl. <16.0 ma/ka DRO)
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			spoon	692		Split spoon 25 -27 fee	et (1.010 ma/ka Cl. <16.2 ma/ka DRO)
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Consulta	nts Lu	u		5	THE ID:	ROC EME SWD JR Phillips	CLIENT:	Rice Operating Company
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					CTOR:	Harrison & Cooper, Inc.	STATE:	
P O Box 7624	ļ		DRIL		HOD:	Air-Rotary	LOCATION:	1-20-5, R-37-E, Sec. 60 (D)
Midland, TX	79708		INSTAL		DATE:	12/21/07	FIELD REP.:	Dale Littlejonn
(432) 528-387	8		WELL	PLACE		15 Feet south of Excavation		JR Philips/Lithlogs (12-07)
		Denth			IENIS:	Lat. 32° 36° 19.1° North, Long.	103° 17 41.3 West	
	Lithology	Deptn	Tuno	Samples		CORTING POUNDING CON		JR, GRAIN SIZE,
┝──┪╘┙╘┙┕╾┼	alah karakatan		Type	Ci (iia)	PID	SORTING, ROUNDING, CON	SOL., DIST. DEATU	RES
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#### Appendix B Vadose Zone Discussion

#### **R.T. Hicks Consultants, Ltd.**



#### **APPENDIX B**

Chloride concentrations observed in the two soil borings at JR Phillips at different depths from surface to 32 feet below ground surface, together with a working understanding of chloride fate and transport, vadose zone physics, and regional ground water quality all may be used to come to conclusions about possible impacts of activities at the JR Phillips junction box site. This appendix presents findings on these topics and our interpretation of available data.

Chloride concentrations from a soil sample are commonly expressed as chloride (in mg.) per mass of soil (in kilograms). Soil in the vadose zone is not saturated with water and it is assumed that all of the chloride is dissolved within the water contained in a soil sample. As a result, comparison of a chloride concentration for soil (expressed as mg/kg) with a chloride concentration of pore water from a soil sample (expressed as mg/L) can be confusing since the latter will be much larger.

Produced water within the EME system commonly has chloride concentrations of 20,000 mg/L to 50,000 mg/L. If produced water is released on the surface, it enters the vadose zone and mixes with pore water already present in the soil. The chloride concentration within the released produced water and the vadose zone water it encounters may be increased or decreased through the following mechanisms:

- i. A release of produced water that has entered the vadose zone and is near the ground surface can cause chloride concentrations in pore water to increase due to evaporation during long dry periods as water evaporates and leaves behind chlorides in the soil.
- ii. Precipitation events occurring at relatively the same time as the release will dilute the chloride concentration in accordance with the relative proportions of the volumes of water.
- iii. Chloride in produced water will disperse into contacted soil water, lowering the chloride concentration of the produced water by dilution. The lower the preexisting moisture content of the soil, the less soil water is available to dilute produced water and thus, the less effect this mechanism has.

Produced water within the vadose zone will almost certainly undergo some change of chloride concentration depending on site characteristics.

Table B-1 presents examples of chloride concentrations from soil samples (mg/kg) and their resultant chloride concentrations in soil water (mg/L) given a measured percent soil moisture and an assumed dry bulk soil density (taken as  $1,500 \text{ kg/m}^3$ ). Soil moisture has a significant impact on how chloride concentrations in soils relate to chloride concentrations in pore water. Examples include:

Soil concentrations from background locations (often with 25 mg/kg to 150 mg/kg chloride concentrations);



- 2) A concentration typical of material excavated at the JR Phillips site (Samples ranged from 1,300 mg/kg to 3,100 mg/kg);
- 3) An example of saturated material from the vadose zone ground water interface at the JR Phillips site;
- 4) And examples from SB-1 below the floor of the excavation (at the center of the JR Phillips site).

Table B-1. Compari	ison of Chloride (	Concentration	ns in Soil an	d Inferr	ed Chloride	
Concentrations in Po	ore Water					

Example Type	Sample Location (if applicable)	Soil Chloride Concentration [mg/kg] <i>Lab.</i> Values are in Italics	Percent Moisture [%] Lab. Values are in italics	Assumed Dry Bulk Density [kg/m^3]	Volumetric Moisture Content using Assumed Dry Bulk Density [-]	Resulting Chloride Concentration in Pore Water [mg/L]
	Abo 1-G Background					
Background Concentration	Location, 4 to 6 feet	30	6.10		0.09	530
Examples		125	5.00		0.08	2625
		125	8.00		0.12	1688
Example of Material from		2100	5.00		0.08	44100
Excavation (depth of 8 to 12	JR Phillip Site	2100	8.00		0.12	28350
feet)		2100	12.00	1500	0.18	19600
Motoriolo from Bolow	SB-1, 15 to 17 feet	653	8.80	1500	0.13	8073
Excavation at IR Phillins	SB-1, 20 to 22 feet	227	6.50		0.10	3719
Site	SB-1, 25 to 27 feet	1010	7.17		0.11	15096
	SB-1, 30 to 32 feet	1730	11.40		0.17	16905
Example of Saturated Material at Vadose Zone- Ground Water Interface		1700	25.00		0.38	8500

Examples of background materials include a background sample from the Abo 1-G site (about 20 miles to the north) and a higher concentration (125 mg/kg) at different percentages of moisture content (5% to 8% moisture). The corresponding chloride concentrations in vadose zone pore water range from about 500 mg/L to 2,600 mg/L.

An example concentration (2,100 mg/kg) of material from the excavation at the JR Phillips site is shown at several percent moisture contents (5% to 12% moisture). Corresponding chloride concentrations are from 44,000 mg/L to 19,600 mg/L.

Also shown is an example of a saturated material (25%) with a chloride concentration similar to that found in the capillary fringe of SB-1 (30-32 feet bgs - 1,700 mg/kg). The resultant chloride concentration in pore water is 8,500 mg/L.

Finally, there are four examples from SB-1 at depths from 15 feet to 32 feet. The uppermost two samples have soil concentrations of 653 mg/kg and 227 mg/kg and percent moistures of 8.8% and 6.5%. Resulting vadose zone pore water concentrations are 8,073 mg/L and 3,719 mg/L respectively. The lowermost two samples have soil concentrations of 1,010 mg/kg and 1,730 mg/kg and percent moistures of 7.17% and



11.4%. Resulting chloride concentrations in vadose zone pore water are 15,096 mg/L and 16,905 mg/L.

#### **OBSERVATIONS**

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- 1) Vadose zone pore water from background locations has chloride concentrations ranging from about 500 mg/L to 2,500 mg/L, one to two orders of magnitude less than chloride concentrations of produced water.
- 2) An example of a soil chloride concentration from the excavation at the JR Phillips site (considering a range of percent moisture contents) features chloride concentrations within the range of chloride concentration of produced water within the EME system.
- 3) The SB-1 samples from the depths of 15 feet and 20 feet with pore water concentrations of 8,073 mg/L and 3,719 mg/L are higher than background concentrations and lower than pore water significantly impacted by produced water.
- 4) The SB-1 samples from the depths of 25 feet and 30 feet with pore water concentrations of 15,096 mg/L and 16,905 mg/L are also higher in concentration than those from the depths of 15 and 20 feet but are still lower than produced water concentrations. The lowermost sample also has a relatively high percent moisture (11.4%).
- 5) If soil from 30 feet bgs in SB-1 was saturated, its pore water concentration would match the chloride levels observed in nearby monitoring wells. A saturated soil with a chloride concentration of 1,700 mg/kg has a pore water concentration of about 8,500 mg/L. At nearby monitoring wells, recent samples (May, 2006) have been collected with chloride concentrations of 8,600 mg/L to 8,700 mg/L.

#### **INTERPRETATIONS**

- The samples from the excavation have chloride concentrations consistent with produced water altered by the processes discussed above.
- The two samples from depths of 15 feet and 20 feet are not consistent with produced water (compare with samples from the excavation), but rather is indicative of water that was at background concentration and is now being affected by chloride dispersing from produced water above. The decreasing chloride concentration and decreasing moisture content with depth is consistent with this interpretation.
- In contrast, the two samples from depths of 25 feet and 30 feet have increasing chloride concentration and increasing percent moisture with depth. From 2004 to 2006, ground water has risen about six feet in this area with a resultant rise in the



capillary fringe. We consider this evidence of the lower vadose zone pore water being affected by high chloride concentration in regional ground water.

- If the soil concentration of the lowermost sample (30 feet) is considered to be from the saturated capillary fringe, the pore water has a concentration of about 8,500 mg/L, about the same as that seen in ground water samples from nearby monitoring wells. However, the sample from this depth is not saturated and has a chloride concentration in pore water of about 16,900 mg/L, about twice what is observed in ground water. Nearby monitoring wells (both up and down gradient) have twenty-foot screen lengths with at least ten feet of screen in ground water, and therefore produce a composite sample of ground water from this upper portion of the aquifer. As mentioned, recent ground water samples from these wells have chloride concentrations of about 8,500 mg/L. This data is consistent with ground water closer to the vadose zone interface (in the upper portion of the aquifer) having highest chloride concentrations.
- About 900 feet to the southeast of the site there is a water well with the top of its 40-foot screen set ten feet below the water table. Ground water samples from this well are about 1,300 mg/L and are representative of concentrations lower in the aquifer (from 10-50 feet below the water table surface).
- We conclude that chloride concentration in ground water is higher near the vadose zone-water table interface and much lower near the bottom of the aquifer. The well data and the soil samples show that chloride concentration in the upper aquifer and within the capillary fringe is about 17,000 mg/L.

The weight of evidence suggests that chloride concentrations beneath the JR Phillips junction box site from 0-22 feet below ground surface have been influenced by what may have been small, intermittent releases of produced water at the surface due to ROC activities at the site. The elevated levels of chloride encountered in SB-1 and SB-2 from 25-32 feet below ground surface appear to be indicative of regional ground water impacts and a recent rise in ground water levels with a corresponding rise in the capillary fringe.

#### Appendix B Lithologic Logs

#### R.T. Hicks Consultants, Ltd.

D T Hial	76			LITHO	DLOG	IC LOG (SOIL BORI	NG)			
N 1 IIICH	19					SB_1		30 Feet		
Consulta	nts Lt	d	MONT	S		BOC EME SWD JR Phillips	CUENT:	Rice Operating Company		
		-	SURFAC		ATION:	3563 (MSL)	COUNTY:	Lea County		
			(	ONTRA	CTOR:	Harrison & Cooper, Inc.	STATE:	New Mexico		
P O Box 762/	1		DRIL	ING ME	THOD:	Air-Rotary	LOCATION:	T-20-S, R-37-E, Sec. 60 (D)		
Midland, TX	, 79708		INSTAL	LATION	DATE:	12/21/07	FIELD REP .:	Dale Littlejohn		
(432) 528-387	78		WELL	PLACE	MENT:	Adjacent to Jct Box	FILE NAME:	\JR Phillips\Lithlogs (12-07)		
• •				COMM	IENTS:	Lat. 32º 36' 19.2" North, Long	g. 103º 17' 41.1" West			
	Lithology	Depth		Samples		LITHOLOGIC DESCRIPTION	I: LITHOLOGY, COL	OR, GRAIN SIZE,		
			Туре	CI (fld)	PID	SORTING, ROUNDING, COI	NSOL., DIST. DEATU	RES		
	<u>ــــــــــــــــــــــــــــــــــــ</u>					SILT AND CALICHE Brown t	o grayish brown (fill m	aterial).		
	⊥ <u>⊥</u>		]							
	<u></u> т т		]			1				
	<u> </u>									
	⊥ <u></u> _	5		r						
	<u>т</u>		excav		6.6					
	<u> </u>		excav		27.2					
	<u>ــ</u>		excav	2,219	1.6					
	<u>ــ</u>		excav	1,709	29.5					
			excav	2,189	2.3					
	<u>ــ</u>		excav	2,519	6.3					
	<u> </u>		excav	2,429	0					
						SILT Light brown with some of	caliche and sand grain	IS.		
s		15								
			spoon	137		Split spoon 15 -17 feet (653 mg/kg Cl, 20 mg/kg DRO)				
3										
			-			SILTY SAND Brown to reddis	sh brown, medium grai	in, poorly sorted, sub angula		
		20	1			30% silt, decreasing with dep	oth.			
			spoon	154		Split spoon 20 -22 fe	eet (227 mg/kg Cl. <16	0.0 mg/kg DRO)		
			1			. ,		5.0 ,		
			1							
			1							
		25	1							
			spoon	692		Split spoon 25 -27 fe	eet (1,010 ma/ka Cl. <	16.2 mg/kg DRO)		
			1			,		,		
			1			1				
			1							
		30	1							
			spoon	1,190		Split spoon 30 -32 fe	eet (1,730 ma/ka Cl. <	16.9 mg/kg DRO)		
TD = 30  Feet			· · · · · ·	, .			· · · · · · · ·			

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				ЦТНС	DLOG	
R T Hick	2		•		200	
			MONIT	OR WEI	L NO.:	SB-2 TOTAL DEPTH: 30.0 Ft
Consulta	nts Lt	d		S	ITE ID:	ROC EME SWD JR Phillips CLIENT: Rice Operating Company
		5	SURFAC		ATION:	3563 (MSL) COUNTY: Lea County
			(	CONTRA	CTOR:	Harrison & Cooper, Inc. STATE: New Mexico
P O Box 7624	L		DRILI	LING ME	THOD:	Air-Rotary LOCATION: T-20-S, R-37-E, Sec. 60 (D)
Midland, TX	79708		INSTAL	LATION	I DATE:	12/21/07 FIELD REP.: Dale Littlejohn
(432) 528-387	8		WELL	PLACE	MENT:	15 Feet south of Excavation FILE NAME: \JR Phillips\Lithlogs (12-07)
				COMN	MENTS:	Lat. 32º 36' 19.1" North, Long. 103º 17' 41.3" West
	Lithology	Depth		Samples		LITHOLOGIC DESCRIPTION: LITHOLOGY, COLOR, GRAIN SIZE,
			Туре	CI (fld)	PID	SORTING, ROUNDING, CONSOL., DIST. DEATURES
Ω						SAND Brown, fine grain, well sorted, angular.
	<u> </u>					SILT AND CALICHE Brown to gravish brown (fill material).
	<u> </u>	5				
	<u>∽</u>					
			excav	3,059	0	
<u>п</u>	<u> </u>		excav	2,609	0	
5 8 8 8	±⊥	10	excav	2,579	0	
sister and the second se	<u>ـد</u>		excav	2,219	0	
lei	<u> </u>		excav	2,279	0	
				ļ		SILT Light brown with some caliche and sand grains.
per la						
		15	cut	700		
5						
e li						SILTY SAND Brown to reddish brown, medium grain, poorly sorted, sub
° (//////		20	cut	418		angular, 30% silt, decreasing with depth.
1 g ///////						
	_					
3		25	cut	480		
		30	cut	629		
TD = 30 Feet						

#### Appendix C Chloride Load Methodology & Calculations

#### **R.T. Hicks Consultants, Ltd.**

#### R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266-0745

#### CALCULATION OF CHLORIDE IN THE VADOSE ZONE

Chloride Load Calculation in the vadose zone requires chloride concentrations from sample points taken from a boring or a trench. Through use of these concentrations and the variables described below; an average "chloride loading" for a site is calculated. The site chloride loading is an averaged mass of chloride between the ground surface and ground water per unit of site area. Total mass of chloride in the vadose zone beneath the site is obtained by multiplying the chloride loading by the site area.

#### Variables:

i e i

In this calculation, the points are numbered from 1 to N with Point 1 being the uppermost sample point and Point N being the sample point closest to ground water.

A(Point i) (mg/kg(moist soil)) - chloride concentration in soil at Point i where i = 1, 2, ..., N. All chloride is assumed to be in the soil moisture.

Rho\_moist (kg/m<sup>3</sup>) - moist soil bulk density. This is calculated using the inputs of porosity (n) and gravimetric moisture content (phi) with a particle density of 2.65 gm/cm<sup>3</sup> (Smettem, K.R.J., 2006). Use of porosity and particle density gives:

 $Rho_dry = (1 - n) * Rho_particle$ 

Use of dry bulk density (Rho\_dry), the density of water, and the gravimetric moisture content (phi) allows the calculation of volumetric moisture content (theta)

theta = phi \* (Rho\_water/Rho\_dry)

Moist bulk density is then given by:

Rho\_moist = Rho\_dry + (theta \* Rho\_water)

Following these steps using a porosity (n) of 0.4 and a gravimetric moisture content (phi) of 0.085 results in a moist bulk density of  $1725 \text{ kg/m}^3$ 

Unless one has some special knowledge of the site, USE THIS VALUE.

del\_x (feet) - the depth interval between two sample points del\_x\_a - the depth interval above a sample point del\_x\_b - the depth interval below a sample point February 26, 2010 Page 2

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#### Calculation of Chloride Loading for each Depth Interval

The calculation for each depth interval "centered" around the sample point is given below. In effect, the chloride concentration of the sample point is considered constant over the depth interval around the sample point. This depth interval extends halfway to the sample points above and below the current sample point (Point i).

ChlLoad(Point i) = A (mg/kg) \* Rho\_moist (kg/m^3) \* (del\_x\_a + del\_x\_b)/2 (feet) \* (0.3048 meter/foot) \* (1 kg/10^6 mg)

= A \* Rho\_moist \*  $(del_x_a + del_x_b)/2 * (0.3048/10^6) \text{ kg/m}^2$ 

The depth intervals at each "end" of the profile are special cases. For the topmost interval:

ChlLoad(Point 1) = A \* Rho\_moist \*  $(del_x_a + del_x_b/2) * (0.3048/10^{6}) \text{ kg/m}^2$ 

For the bottom interval:

ChlLoad(Point N) = A \* Rho\_moist \*  $(del_x a/2 + del x b) * (0.3048/10^{6}) kg/m^{2}$ 

#### Calculation of Chloride Loading for the Site

Total chloride loading is obtained by adding together the chloride loading of all of the intervals for Sample Points 1,2,...,N.

TChlLoad = ChlLoad(Point1) + ChlLoad(Point2)+...+ChlLoad(PointN)

This number represents total chloride from the ground surface to ground water per unit of area at the site.

#### Calculation of Total Chloride in the Vadose Zone for the Site

To obtain total chloride in the vadose zone at the site, multiply the "Total Chloride Loading" by the area of the site:

 $TotalChl(kg) = TChlLoad kg/m^2 * Area (feet^2) * 0.0929 (m^2/feet^2)$ = TChlLoad \* Area \* 0.0929 (kg) FY. \*

-



TotalChILoad

	Boring ID	Chloride Mass Loading		
		[kg/m^2]	[lbs/yard^2]	
	SB #1	13.60	25.08	
Linked From	SB #2	9.92	18.28	
ChILoadBorings Worksheet				
	Average for Site using Equal Areas	11.76	21.68	
	Background Chloride Loading	1.84	3.39	

Input Va	lues Used	Elsewhwere in the Calculation	
Porosity	0.4	[-]	Soil Density Sheet
Gravimetric Moisture Content	0.085	[mass of water/mass of dry soil]	Soil Density Sheet
Resultant	Values Use	ed Elsewhwere in the Calculation	n
Resultant Dry Bulk Density	1590	[kg/meter^3]	Soil Density Sheet
Volumetric Moisture Content	0.1352	[-]	Soil Density Sheet
Resultant Moist Bulk Density	1725.2	[kg/meter^3]	Soil Density Sheet

Input	Length of Site	30.00	[feet]	1	
Input	Width of Site	30.00	[feet]	1	
	Area of Site	900.00	[feet^2]	]	
	Total Chloride in	983	[kg]	9.14	[meters]
	Vadose zone at	2168	[lbs]	9.14	[meters]
Output	Site	1.08	[tons]	83.61	[meters^2]
	Vadose Zone	829	[kg]		
	Minus	1829	[lbs]		
	Chloride	0.91	[tons]		







Inputs are in Blue
Outputs are in yellow

rs \$

Dry Bulk Density from Porosity					
	2.65	Particle Density [g/cm^3] See Almost Any Textbook			
Input	0.4	Porosity [ - ]			
Output	1.59	Dry Bulk Density [g/cm^3]			
Output	1590	Dry Bulk Density [kg/m^3]			

	Moist Bulk Density from Porosity and Gravimetric Moisture Content							
	1.0 1000.0	Density of Water [gm/cm^3] Density of Water [kg/meter^3]						
Input	0.085	Gravimetric moisture content moisture [mass of water/mass of dry soil]						
Output	0.1352	Volumetric moisture content [-] (theta_v)						
Output	1.7252	Moist Bulk Density [g/cm^3]						
Output	1725.2	Moist Bulk Density [kg/m^3]						

EME JR Phillips

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ChlLoadBorings

Inputs	are in
Blue	
Output	s are
in vello	w

EME JR Phillips

Assumed moist bulk density							
Density			1.1	Background			
Worksheet)	1725	[kg/m^3]		Concentration	[mg/kg]	100	Input
conversuion				Depth to Water minus Depth of			
factor	0.000001	[kg/mg]		Excavation	[feet]	35	Input
conversuion				Background			1.000
factor	0.3048	[meter/foot]		Chloride Loading	[mg/kg]	1.84	1.

Depth of Excavation 0.0 [feet]

	SB #1	Depth	Depth below excavated floor	del_x	Chl conc.		Chloride Load per depth interval	
	•	lieetj	Nieet]	llicet]	[[119/K9]		[[Kg/III 2]	-
	Assumed		0.0		624			
nput		12	12.0	12.0	624		4.43	
nput		15	15.0	3.0	653		1.37	
nput		20	20.0	5.0	227		0.60	
nput		25	25.0	5.0	1010		2.66	
nput		30	30.0	5.0	1730		4.55	
nput	Assumed		35.0		1730			
						Total Chloride		
						load	13.60	[kg/m^2]

	SB #2	Depth {feet]	Depth below excavated floor {feet]	del_x [feet]	Chl conc. [mg/kg]		Chloride Load per depth interval [kg/m^2]	
	Assumed		0.0		624			
Input Input	-	12	12.0 15.0	12.0 3.0	624 700		4.43	-
Input		20	20.0	5.0	418		1.10	
Input		30	30.0	5.0	629		1.65	•
	Assumed		35.0		629			
						Total Chloride load	9.92	[kg/m^2]

