

1R - 460

WORKPLANS

Date:

5-7-10

Hansen, Edward J., EMNRD

From: Katie Jones [kjones@riceswd.com]
Sent: Friday, June 04, 2010 3:20 PM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder; Gil Van Deventer
Subject: EME A-12 (1R0460) CAP Amendment
Attachments: ROC A-12 leak to EME L-6 boot.jpg

Mr. Hansen,

A Corrective Action Plan (CAP) for EME A-12 (1R0460) was submitted to NMOCD on May 7, 2010 and approved by NMOCD on May 11, 2010. In that CAP, ROC requested to remove a chloride mass of 1,953 kg from MW-1. ROC requests to amend that report to remove the chloride mass by pumping groundwater from the nearby EME L-6 boot site (see attached Figure 5) to maximize environmental benefit of the chloride mass removal effort. The recovery system at EME L-6 boot is readily available and as of May 2010 a chloride concentration of 11,200 mg/L was observed.

A chloride concentration of 11,200 mg/L (.0112 kg/L) yields:

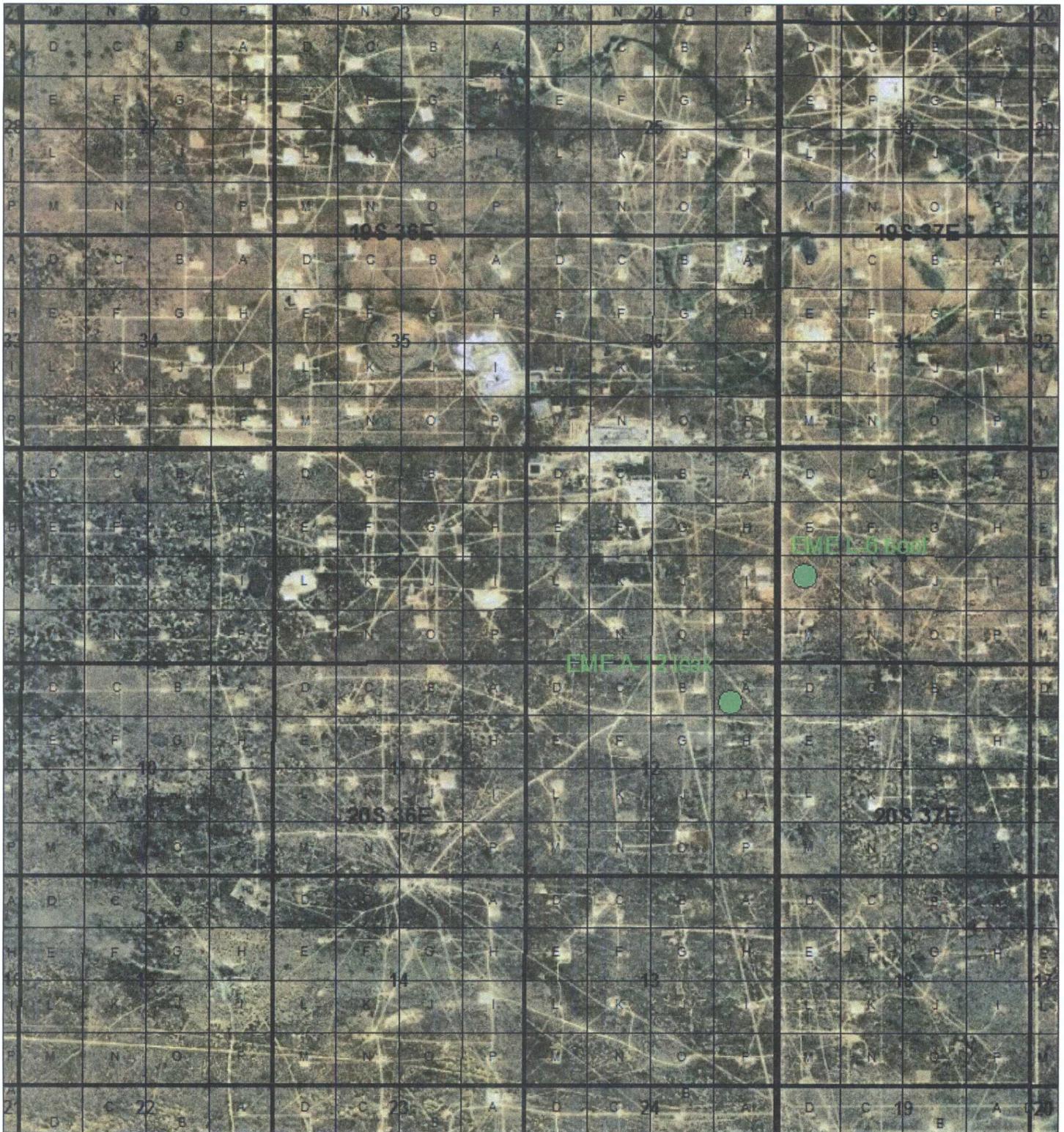
$1,935 \text{ kg} \div .0112 \text{ kg/L} \div 3.7854 \text{ L/gal} \div 42 \text{ gal/bbl} = 1,086.7 \text{ barrels}$

Groundwater quality at L-6 allows a minimal removal of water and a high removal of chloride from groundwater. Removed groundwater will be utilized for pipeline and well maintenance. Groundwater will be pumped at a rate of approximately 1 gallon per minute (gpm) for approximately 8 hours per day. If you have any questions or comments, please do not hesitate to contact us.

Thank you.

Katie Jones
Environmental Project Coordinator
RICE Operating Company

EME A-12 leak to EME L-6 boot



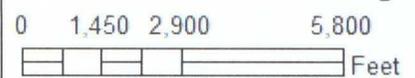
EME A-12 leak

Legals: UL/A sec. 12 T20S R37E
 NMOCD Case #: 1R460

EME L-6 boot

Legals: UL/L sec. 6 T20S R37E

FIGURE 5



Drawing date: 6/3/2010
 Drafted by: Lara Weinheimer



P. O. Box 7624
Midland TX 79708
Office: 432-682-0008
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CERTIFIED MAIL
RETURN RECEIPT NO. 7010 0290 0003 1264 9109

May 7, 2010

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: **CORRECTIVE ACTION PLAN**
EME A-12 Leak Site (NMOCD Case No. 1R0463)
T20S-R36E-Section 12, Unit Letter A
Lea County, New Mexico

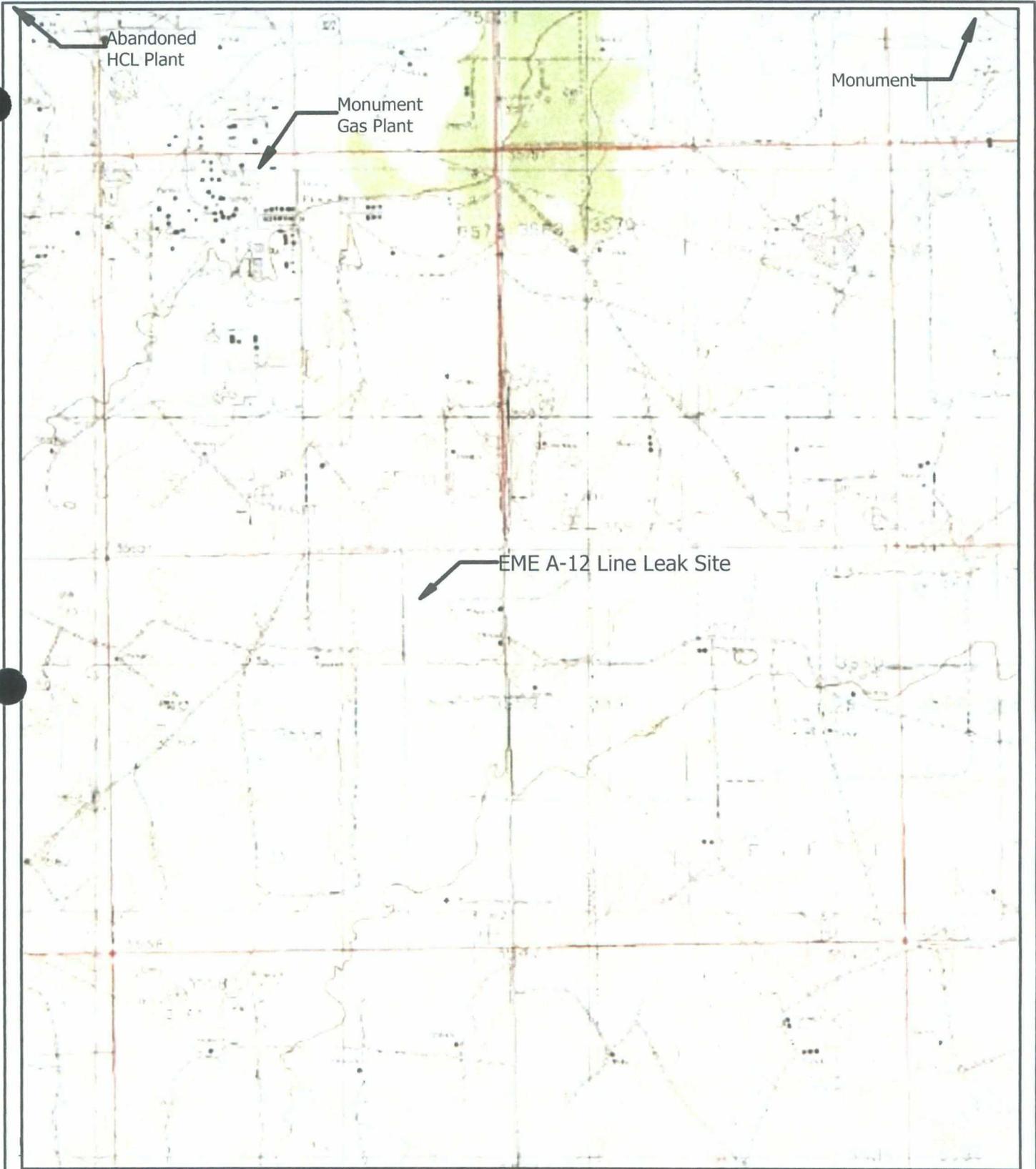
RECEIVED OGD
2010 MAY 10 A 11: 04

Mr. Hansen:

RICE Operating Company (ROC) retained Trident Environmental to address potential environmental concerns at the above-referenced site. ROC submitted a notification of groundwater impact to NMOCD on December 10, 2008 based on the findings of the activities performed in accordance with the Investigation & Characterization Plan (ICP). This Corrective Action Plan (CAP) incorporates the findings from the ICP and proposes recommendations for corrective action similar in scope and context to other sites in the regionally impacted Monument area.

Site Description

The A-12 Leak site is located at township 20 south, range 36 east, section 12, unit letter A approximately 3 miles west-southwest of Monument, NM as shown on the attached Site Location Map (Figure 1). Land in the site area is primarily utilized for crude oil production and cattle ranching.



EME A-12 Leak Site
 T20S - R36E - Section 12 - Unit A
RICE *Operating Company*

FIGURE 1
 SITE LOCATION MAP

Site History

On January 27, 2003, ROC was notified of an accidental discharge of approximately 25 barrels of produced water from an 8-inch A/C pipeline at a point located approximately 938 feet west of the A-12 junction box. Approximately 5 barrels of produced water were recovered and discharged to an EME SWD facility. The 8-inch A/C pipeline was replaced with a 13-foot length of 8-inch PVC pipe. The initial C-141 report was submitted by ROC on February 17, 2003, and approved by the NMOCD on March 7, 2003. A 2,384-ft section of the existing 8-inch pipeline was lined with 6-inch polyethylene pipe.

Initial soil sampling activities conducted on January 27, February 21, and March 6, 2003. An impacted surface area of 4,311 ft² was estimated based on chloride field tests and visual observations. On March 6, 2003, the upper 12-16 inches of impacted soils (168 cubic yards) were excavated and transported to the C&C Landfarm. ROC submitted a disclosure of potential groundwater impact on April 1, 2003. On July 15, 2004, a soil sample collected from a boring at a depth of 30 feet below ground surface (bgs) confirmed total petroleum hydrocarbons (TPH) and chloride impact to the vadose zone.

On April 25, 2005, ROC submitted an *Investigation and Characterization Plan (ICP)* to the NMOCD to address potential groundwater concerns at this site. In accordance with the ICP, four soil borings and three monitoring well installations were conducted on July 2, 2008. Groundwater was encountered at approximately 32 ft bgs. The monitoring wells were constructed, developed, and sampled pursuant to OCD guidelines.

After two quarters of groundwater sampling and laboratory analysis it was confirmed that chloride and total dissolved solids (TDS) exceed the Water Quality Control Commission (WQCC) standards at the site. ROC submitted a notification of groundwater impact to the NMOCD on December 10, 2008. Chloride and TDS concentrations are known to be elevated on a regional scale in this area near Monument as is clearly evidenced by the elevated chloride and TDS concentrations in the upgradient monitoring well (MW-2) at this site. ROC has continued quarterly groundwater monitoring at the site.

Regional and Local Geology

The site is underlain by Quaternary colluvium deposits composed of sand, silt, and gravel deposited by slopewash, and talus which were re-deposited from the underlying Ogallala Formation. These deposits are often calichified (indurated with cemented calcium carbonate) with caliche layers from 1 to 20 feet thick. The thickness of the colluvium deposits and Ogallala Formation at the site is estimated between 60 to 100 feet; however, it varies locally as a result of significant paleo-topography at the top of the underlying Triassic Dockum Group. Since Cretaceous Age rocks in the region have been removed by pre-Tertiary erosion, the colluvial deposits and Ogallala Formation rest unconformably on the Triassic Dockum Group. The uppermost unit of the Dockum Group is the Chinle Formation, which primarily consists of micaceous red clay and shale but also contains thin interbeds of fine-grained sandstone and siltstone. The red clays and shale of the Chinle Formation act as an aquitard beneath the water bearing colluvial deposits and therefore limit the amount of recharge to the underlying Dockum Group.

Based on the descriptions provided in lithologic logs, the subsurface soils are composed of very fine- to medium-grained sand and caliche. More detailed descriptions of the subsurface lithology are provided in the soil boring and monitoring well logs (Appendix A).

Regional and Local Hydrogeology

Potable ground water used in southern Lea County is derived primarily from the Ogallala Formation (including the colluvial deposits) and the Quaternary alluvium. Lower yields have also been provided by water bearing zones within the Triassic Dockum Group in a few scattered areas within southern Lea County. No potable water is known to be derived below the Triassic Dockum Group. Water from the Ogallala and alluvium aquifers in southern Lea County is used for irrigation, stock, domestic, industrial, and public supply purposes.

Water well records from the Office of the State Engineer (NMOSE) and the United States Geological Survey (USGS) websites were reviewed to determine if there are any active water supply wells in use for domestic, irrigation, livestock, municipal, or industrial purposes in the site area. As a result of this review and several field reconnaissance efforts there currently are no known potential water supply receptors within 1,000 feet of the A-12 Leak site.

Recent data from the three monitoring wells at the A-12 Leak site shows that the water table is at a depth of approximately 32 ft bgs and slopes towards the southeast at a magnitude of approximately 0.002 ft/ft which is consistent with those of several other groundwater monitoring sites in the Monument area and the regional gradient as cited in published reports. The base of the aquifer is estimated at approximately 70 ft bgs (Nicholson and Clebsch, 1961), therefore the saturated thickness is estimated at 38 ft. There is no surface water body located within a mile of the site.

Characterization of Vadose Zone Conditions

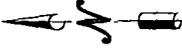
On July 2, 2008, soil samples were collected at 5-foot intervals using an air-rotary drilling rig at seven locations to a depth of 30 feet. Three of the borings were converted into monitoring wells (MW-1, MW-2, and MW-3) and the remaining four borings ((B-1, B-2, B-3, and B-4) were backfilled with bentonite chips to the ground surface. Soil samples were field tested for chloride content using field-adapted Method 4500-Cl-B and headspace readings were recorded using a Mini-Rae Model PGM 76 photoionization detector (PID) calibrated with 100 isobutylene. Select samples were submitted for laboratory analysis of chlorides (EPA Method 4500-Cl-B), benzene, toluene, ethylbenzene, and xylenes (BTEX; EPA Method 8021B), and total petroleum hydrocarbons (TPH; Method 8015M). Results of all chloride field tests, PID readings, and lab analytical results are shown in Figure 2. A profile of chloride concentrations versus depth is depicted in Figure 3. Lithologic logs of each soil boring and monitoring well construction diagrams are included in Appendix A. Photo documentation of sampling activities is included in Appendix B. Laboratory analytical reports and chain of custody documentation are included in Appendix C.

MAP LEGEND

- Monitoring Well Location
- Soil Boring Location

Chloride (Cl) and Photoionizer Detector (PID) Readings listed in parts per million (ppm). Benzene, Toluene, Ethylbenzene, Xylene (BTEX) and Total Petroleum Hydrocarbons (TPH) listed in milligrams per kilogram (mg/kg).

Samples Collected on July 2, 2008



Feet	Cl ⁻ (ppm)		PID (ppm)
	Field	Lab	
5'	118	---	0
10'	446	---	0
15'	596	---	0
20'	780	1340	0
25'	810	---	---
30'	984	---	---

MW-2

Feet	Cl ⁻ (ppm)		PID (ppm)
	Field	Lab	
5'	58	---	0
10'	449	---	0
15'	861	720	0
20'	785	---	0
25'	808	---	0
30'	946	---	0

B-2

Feet	Cl ⁻ (ppm)		PID (ppm)
	Field	Lab	
5'	310	---	0
10'	353	---	0
15'	894	---	0
20'	1231	1280	0
25'	996	---	0
30'	1069	---	0

B-1

Line Leak 01/24/03

B-3

B-4

RICE Operating Company
8-inch A/C Pipeline

Approximate Outline of Leak Upper 12' - 16' (168 yds) was excavated & hauled to landfill on 03/06/2003

MW-1

MW-3

Feet	Cl ⁻ (ppm)		PID (ppm)		Hydrocarbons (mg/kg)	
	Field	Lab	BTEX	TPH	Benzene	TPH
5'	114	---	0	---	---	---
10'	321	---	0	---	---	---
15'	710	1170	0	---	---	---
20'	553	---	0	---	---	---
25'	716	---	0	---	---	---
30'	616	976	36.7	<0.1	0.867	1498

Feet	Cl ⁻ (ppm)		PID (ppm)		Hydrocarbons (mg/kg)	
	Field	Lab	BTEX	TPH	Benzene	TPH
5'	871	1460	686	---	<0.1	5.57
10'	612	496	921	---	<0.1	6.26
15'	960	---	2.9	---	---	---
20'	699	---	0.8	---	---	---
25'	1126	---	---	---	---	---
30'	1294	---	---	---	---	---

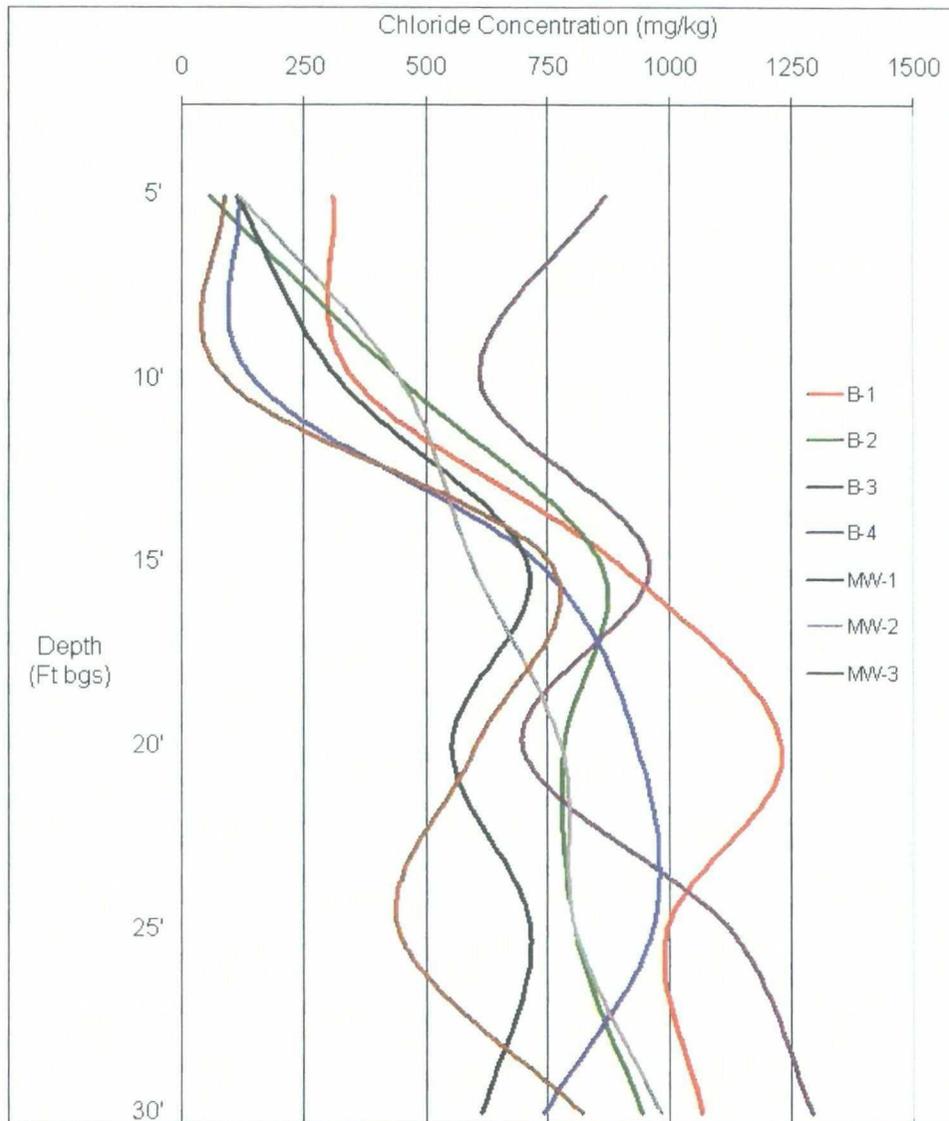
Feet	Cl ⁻ (ppm)		PID (ppm)		Hydrocarbons (mg/kg)	
	Field	Lab	BTEX	TPH	Benzene	TPH
5'	118	---	1174	---	0.105	16.3
10'	149	128	1523	---	2.44	21.2
15'	732	768	13.5	<0.1	<0.1	<10
20'	936	---	1.8	---	---	---
25'	966	---	---	---	---	---
30'	743	---	---	---	---	---



EME A-12 Leak Site (1R0463)
T20S - R36E - Section 12, Unit A
RICE Operating Company

FIGURE 2
CHLORIDE AND HYDROCARBON CONCENTRATIONS IN VADOSE ZONE

Figure 3: Profile of Chloride Concentrations in Vadose Zone



Chloride concentrations in the four soil borings and three monitoring wells (Figure 2) ranged from a minimum of 58 ppm at 5 ft bgs in boring B-2 to a maximum of 1,460 ppm at 5 ft bgs in boring B-3. The average chloride concentration soil borings MW-1, B-1, B-3 and B-4 (*inside* the leak boundary) was 712 ppm. Average chloride concentrations in soil borings B-2, MW-2, and MW-3 (*outside* the leak boundary) was 580 ppm.

There were no indications of hydrocarbon impact at borings B-1, B-2, MW-2, and MW-3 (PID readings measured 0 ppm for each sampled interval). Laboratory analysis of hydrocarbon constituents of concern (benzene, BTEX, and TPH) in borings B-3 and B-4 indicate impact is limited to the upper 5 to 10 feet of the vadose zone. Monitoring well MW-1 indicates hydrocarbon impact immediately above the water table at 30 ft bgs but not at all within the vadose zone above that depth, indicating potential migration within the groundwater from a location upgradient and offsite.

Characterization of Groundwater Conditions

Monitoring wells MW-1, MW-2, and MW-3 have been sampled on a quarterly basis since September 3, 2008. Recent data from the three monitoring wells show that the water table is at a depth of approximately 32 ft bgs and slopes towards the southeast at a magnitude of approximately 0.002 ft/ft. A map of the most current groundwater conditions for the A-12 Leak site is depicted in Figure 4. The historical analytical results and groundwater elevations for monitoring wells MW-1, MW-2, and MW-3 are summarized in Table 1. The laboratory analytical report and chain of custody form for the most recent ground water sampling event are included in Appendix C. Based on the results of the most recent sampling event on November 10, 2009, the following observations are evident:

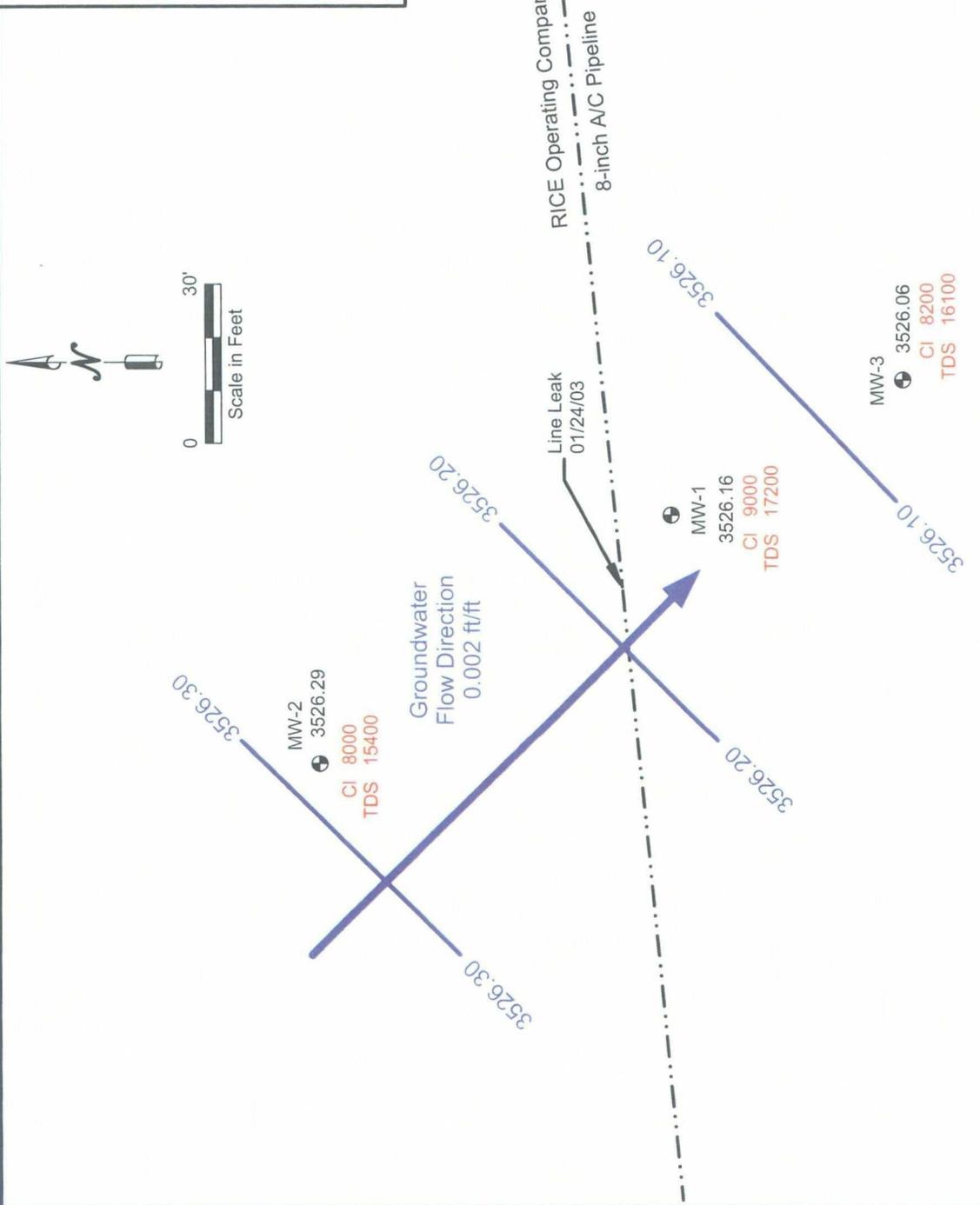
- BTEX concentrations in monitoring wells MW-1, MW-2, and MW-3 have been below the WQCC standards for each constituent and for every sampling event taken place, and are not constituents of concern.
- Chloride concentrations in monitoring wells MW-1 (9,000 mg/L), up gradient MW-2 (8,000 mg/L), and down gradient MW-3 (8,200 mg/L) exceed the WQCC standard of 250 mg/L.
- The TDS concentrations in monitoring wells MW-1 (17,200mg/L), upgradient MW-2 (15,400 mg/L), and down gradient MW-3 (16,100 mg/L) exceed the WQCC standard of 1,000 mg/L.

Each monitoring well indicates chloride and TDS concentrations above WQCC standards; however, after seven consecutive quarterly sampling events it is clear that the upgradient monitoring well (MW-2) has chloride and TDS concentrations consistent with those observed near the line leak (MW-1) and downgradient well MW-3. Therefore, we conclude that the elevated chloride and TDS concentrations observed on site are due in most part to the regional impact from an upgradient source(s) northwest of this site.

MAP LEGEND

- MW-2
Monitoring Well
3626.29
Water Table Elevation (Ft AMSL)
- CI 8000
TDS 15400
Chloride and TDS
Concentrations in mg/L
- 3626.20
Groundwater Elevation Contour
(Contour Interval = 0.10 feet)
- B <0.001
T <0.001
E <0.001
X <0.003
BTEX Concentrations in all
monitoring wells are less than
the method detection limit for
each constituent as noted (mg/L).

Sampling Date: February 26, 2010



EME A-12 Leak Site (1R0463)
T20S - R36E - Section 12, Unit A
RICE Operating Company

FIGURE 4
GROUNDWATER GRADIENT AND
CHLORIDE, TDS, & BTEX
CONCENTRATION MAP

Table 1: Summary of Groundwater Monitoring Results

Monitoring Well	Sample Date	Depth to Groundwater (feet BTOC)	Groundwater Elevation (feet AMSL)	Chloride (mg/L)	TDS (mg/L)	Benzene (mg/L)	Toluene (mg/L)	Ethylbenzene (mg/L)	Xylene (mg/L)
MW-1	09/03/08	34.22	3526.67	8,600	17,500	<0.001	<0.001	<0.001	<0.003
	11/07/08	34.23	3526.66	9,300	17,500	<0.001	<0.001	<0.001	<0.003
	02/16/09	34.22	3526.67	9,400	17,200	<0.001	<0.001	<0.001	<0.003
	05/19/09	34.21	3526.68	9,500	18,900	<0.001	<0.001	<0.001	<0.003
	08/26/09	34.46	3526.43	8,900	18,200	<0.001	<0.001	<0.001	<0.003
	11/10/09	34.63	3526.26	8,700	19,200	<0.001	<0.001	<0.001	<0.003
	02/26/10	34.73	3526.16	9,000	17,200	<0.001	<0.001	<0.001	<0.003
MW-2	09/03/08	34.54	3526.79	8,200	16,600	<0.001	<0.001	<0.001	<0.003
	11/07/08	34.55	3526.78	7,900	15,000	<0.001	<0.001	<0.001	<0.003
	02/16/09	34.49	3526.84	8,100	15,100	<0.001	<0.001	<0.001	<0.003
	05/19/09	34.47	3526.86	9,000	16,900	<0.001	<0.001	<0.001	<0.003
	08/26/09	34.71	3526.62	7,600	15,300	<0.001	<0.001	<0.001	<0.003
	11/10/09	34.95	3526.38	7,800	16,500	<0.001	<0.001	<0.001	<0.003
	02/26/10	35.04	3526.29	8,000	15,400	<0.001	<0.001	<0.001	<0.003
MW-3	09/03/08	32.93	3526.56	8,100	16,600	<0.001	<0.001	<0.001	<0.003
	11/07/08	32.94	3526.55	8,200	15,500	<0.001	<0.001	<0.001	<0.003
	02/16/09	32.86	3526.63	8,400	15,800	<0.001	<0.001	<0.001	<0.003
	05/19/09	32.85	3526.64	8,800	15,500	<0.001	<0.001	<0.001	<0.003
	08/26/09	33.13	3526.36	8,100	16,200	<0.001	<0.001	<0.001	<0.003
	11/10/09	33.34	3526.15	8,200	16,800	<0.001	<0.001	<0.001	<0.003
	02/26/10	33.43	3526.06	8,200	16,100	<0.001	<0.001	<0.001	<0.003
WQCC Standards				250	1000	0.01	0.75	0.75	0.62

Recommendations for Corrective Action to Vadose Zone

The repair of the pipeline and removal of the upper 12-in to 16-in of impacted soils (168 yd³) has effectively mitigated any potential threat of chlorides and TDS from the line leak. The surrounding area is supportive of vegetation and will be re-seeded with a mixture of native grasses and plants that will re-vegetate the area at a natural rate. ROC will monitor the site for continued healthy growth of native vegetation and add amendments if necessary.

Recommendations for Corrective Action to the Groundwater

It has become clear that the upgradient monitoring well (MW-2) has chlorides and TDS concentrations consistent with those observed near the line leak (MW-1) and downgradient well (MW-3), which indicates regional impact from an upgradient source(s) northwest of the site. 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 exact source of groundwater impact at the A-12 Leak site is unknown because of the numerous potential facilities, past and present, located upgradient of the site.

ROC proposes to install a groundwater recovery system to remove chloride impacted groundwater that will be utilized for well and pipeline maintenance. It is being conservatively assumed that the observed chloride concentrations in monitoring well MW-1 (adjacent to the line leak) were contributed, in part, by a release from the ROC pipeline. With that assumption in mind, the following worst-case scenario estimate of chloride mass was calculated based on straight-forward mass balance equations which are explained as follows:

Method 1 (Estimate of chloride mass in groundwater)

First, a 4,311 ft² area of the chloride plume from this release was estimated to be the same area as reported at the time of the release. The aquifer thickness was estimated to be 38 ft (depth to water table at 32 feet subtracted from aquifer bottom estimated at 70 feet). The total area multiplied by the thickness of the aquifer and its porosity (0.25) results in a saturated pore space volume of 1,245,785 liters. Next, the difference between the average chloride (9,057 mg/L) observed in MW-1 (near the line leak "source") and the average chloride (8,086 mg/L) observed in upgradient MW-2 was calculated. This net difference (971 mg/L) is conservatively presumed to be the chloride concentration in groundwater contributed by a release from the line leak. This chloride concentration multiplied by the saturated pore space volume results in a chloride mass of 1,126 kg. Future sampling results might dictate re-calculation by this method. These calculations are shown in the following table in the same order as described above.

Method 1: Estimate of Chloride Mass in Groundwater:

Parameter Type	Value	Parameter Validation (description of equations used)
Release area	4,311 ft ²	Area of Commingled Plume (Total surface area covered by leak)
Aquifer Thickness	38 ft	Known lithology of monitoring well MW-1 and published reports (Nicholson and Clebsch, 1961).
Porosity	0.25	Professional estimate for water saturated pore volume
Volume of impacted Groundwater below site.	40,955 ft ³	Simple multiplication of each parameter listed above (saturated pore space volume).
Volume of Impacted Groundwater below site.	1.246E+06 L	Unit conversion of previous value to liters (saturated pore space volume)..
Chloride concentration	971 mg/L	Difference between average chloride concentration in MW-1 (9,067 mg/L) and upgradient MW-2 (8,100 mg/L)
Total chloride mass	1,126 kg	Simple multiplication of two parameters listed above

Method 2 (Estimate of chloride mass in vadose zone)

The approach for estimating the chloride mass in the vadose zone is similar to that explained for groundwater above. Again, an area of 4,311 ft² was estimated as reported at the time of the release. The 32 ft thickness of the vadose zone is equal to the known depth to groundwater below ground surface. The total area multiplied by the vadose zone thickness results in a total volume of 137,952 ft³. Estimating the mass of the vadose zone at 100 lb/ft³, corresponds to approximately 45.4 kg/ft³. Multiplying that factor by the

volume of impacted vadose zone results in weight of 6,263,021 kg. Next, the difference between the average chloride concentration of 712 mg/kg for the four soil borings inside the leak boundary (MW-1, B-1, B-3, and B-4) and the average chloride concentration of 580 mg/kg for the three borings outside the leak boundary (B-2, MW-2, and MW-3) was calculated. This net difference (132 mg/kg) is a conservative estimate of the chloride concentration in the vadose zone contributed by the line leak. This chloride concentration multiplied by the weight of the vadose zone beneath the leak area results in a chloride mass of 827 kg in the vadose zone. These calculations are shown in the following table in the same order as described above.

Method 2: Estimate of Chloride Mass in Vadose Zone:

Parameter Type	Value	Parameter Validation (description of equations used)
Release area	4,311 ft ²	Area of Commingled Plume (initial surface area covered by leak)
Vadose zone thickness	32 ft	Known lithology of monitoring well MW-1 and published reports (Nicholson and Clebsch, 1961).
Volume of impacted vadose zone	137,952 ft ³	Simple multiplication of each parameter listed above
Mass of impacted vadose zone	6.26E+06 kg	Volume of impacted vadose zone times mass density (1 ft ³ of soil weighs ~45.4 kg or ~100 lb/ft ³)
Chloride concentration added to soil from leak	132 mg/kg	Difference between average chloride concentration in soil borings MW-1, B-1, B-3, & B-4 (712 mg/kg) inside leak boundary and soil borings B-2, MW-2, & MW-3 (580 mg/kg) outside leak boundary.
Total chloride mass	827 kg	Simple multiplication of two parameters listed above

Adding both of the Method 1 and 2 estimates results in a total chloride mass of 1,953 kg.

A groundwater recovery system employed at the A-12 Leak site extracting water with chloride concentrations consistent with those in MW-1 (~9,000 mg/L) could extract about 49.1 kg per day, assuming an average pumping rate of 1 gallon per minute can be achieved. At that rate it would take approximately 40 days and the equivalent of 1,365 barrels (bbls) to remove 1,953 kg of chloride mass.

The conceptual design and specifications of the groundwater recovery system include a submersible pump capable of discharging at a minimum rate of 1 gpm. Due to the remoteness of the site, the necessary power supply for the system will likely be provided by a solar powered panel. Water from the recovery well will be utilized in pipeline and well maintenance operations. Flow rate, total volume, and chloride content of the recovered will be measured and recorded on a log.

Termination and Proposed Schedule of Activities

ROC will continue quarterly groundwater sampling at each of the three monitoring wells for chloride, sulfate, and TDS analyses; however, the EPA Method 8021B analysis will be suspended since each monitoring well has had concentrations below 0.001 mg/L for

each constituent of BTEX, which is well below WQCC standards. Vegetation will be monitored for growth and amendments added if necessary.

Upon approval of this Corrective Action Plan, ROC will schedule the site to be re-seeded. The ground water remedy at the A-12 Leak site will be implemented utilizing the existing 4-inch monitoring well (MW-1). ROC intends to use one of their groundwater recovery systems currently employed at another site after it is available for use.

At the completion of corrective actions as described herein and in accordance with 19.15.29 NMAC (Part 29), a final report will be submitted to the NMOCD with a termination request for this corrective action plan and plugging of the three monitoring wells using cement grout with 1% to 3% bentonite.

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.

We appreciate the opportunity to work with you on this project. Please feel free to call Hack Conder at 575-393-9174, if you have any questions.

Sincerely,



Gilbert J. Van Deventer, REM, PG
Trident Environmental

cc: Hack Conder (ROC)

Enclosures: Figures, tables, lithologic logs/well construction diagrams, photo documentation, and laboratory analytical reports

Appendix A

Lithologic Logs

And

Monitoring Well Construction Diagrams

SOIL BORING LITHOLOGIC LOG

MW-2

B-2

B-1

B-3

B-4

Line Leak
01/24/03

MW-1

MW-3

BOREHOLE NO.: B-1

TOTAL DEPTH: 39 Feet

SITE ID: EME A-12 Leak

CLIENT: RICE Operating Company

CONTRACTOR: Harrison & Cooper, Inc.

COUNTY: Lea

DRILLING METHOD: Air Rotary

STATE: New Mexico

START DATE: 07/02/08

LOCATION: T205-R36E-Sec 12-Unit A

COMPLETION DATE: 07/02/08

FIELD REP.: G. Van Deventer

COMMENTS: Boring located ~14 ft north and ~10 ft east of leak source.

Latitude 32° 35' 30.0" N, Longitude 103° 18' 9.4" W

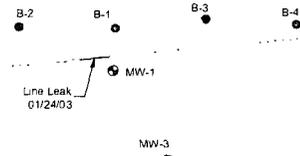
Sample	Depth	Time	Type	Chloride (ppm)	PID (ppm)	USCS	LITHOLOGIC DESCRIPTION:
							LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
			Surface				
	5	0839	Split Spoon	310	0		Very fine- to fine-grained sand with ~10% calcium carbonate in matrix, very pale orange (10YR 8/2), unconsolidated, dry, no odor.
	10	0842	Split Spoon	353	0		Very fine- to fine-grained sand with ~10% calcium carbonate in matrix, very pale orange (10YR 8/2), unconsolidated, dry, no odor.
	15	0848	Split Spoon	894	0		Very fine- to fine-grained sand with ~10% calcium carbonate in matrix, very pale orange (10YR 8/2), unconsolidated, dry, no odor.
	20	0850	Split Spoon	1231	0		Very fine- to fine-grained sand with ~5-10% calcium carbonate in matrix and caliche fragments, very pale orange (10YR 8/2) and grayish orange (10YR 7/4), dry, no odor. Lab chloride = 1280 mg/kg.
	25	0901	Split Spoon	996	0		Fine sand, light brown (5YR 6/4), with some caliche fragments. Sand grains are subrounded moderately sorted, dry, no odor.
	30	0909	Split Spoon	1069	0		Fine sand, grayish orange (10YR 7/4), subrounded moderately sorted, slightly moist, no odor.
	35						Groundwater slowly infiltrated to ~ 32 ft bgs.
	40						Bottom of boring at 39 feet.
	45						
	50						
	55						

3/8 Bentonite Hole Plug

5"

SOIL BORING LITHOLOGIC LOG

MW-2



BOREHOLE NO.: B-2

TOTAL DEPTH: 30 Feet

SITE ID: EME A-12 Leak

CLIENT: RICE Operating Company

CONTRACTOR: Harrison & Cooper, Inc.

COUNTY: Lea

DRILLING METHOD: Air Rotary

STATE: New Mexico

START DATE: 07/02/08

LOCATION: T205-R36E-Sec 12-Unit A

COMPLETION DATE: 07/02/08

FIELD REP.: G. Van Deventer

COMMENTS: Boring located ~39 ft WNW of leak source

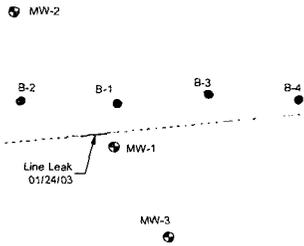
Latitude 32° 35' 30.2" N, Longitude 103° 18' 10.0 W

Sample	Depth	Time	Type	Chloride (ppm)	PID (ppm)	USCS	LITHOLOGIC DESCRIPTION:
							LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
			Surface				
	5	1432	Split Spoon	58	0	SM/CAL	Very fine sand with ~10% calcium carbonate in matrix, very pale orange (10YR 8/2), unconsolidated, dry, no odor.
	10	1434	Split Spoon	449	0	SM/CAL	Very fine sand with ~10% calcium carbonate in matrix, very pale orange (10YR 8/2), unconsolidated, dry, no odor.
	15	1437	Split Spoon	861	0	SM/CAL	Very fine sand with ~10% calcium carbonate in matrix, very pale orange (10YR 8/2), unconsolidated, dry, no odor. Lab chloride = 720 mg/kg.
	20	1440	Split Spoon	785	0	SM/CAL	Very fine sand with ~5-10% calcium carbonate in matrix and caliche fragments, very pale orange (10YR 8/2) and grayish orange (10YR 7/4), dry, no odor.
	25	1447	Split Spoon	808	0	SW/CAL	Fine sand, light brown (5YR 6/4), with some caliche fragments. Sand grains are subrounded moderately sorted, dry, no odor.
	30	1449	Split Spoon	946	0	SW/CAL	Fine sand, grayish orange (10YR 7/4), with some caliche fragments. Sand grains are subrounded moderately sorted, slightly moist, no odor.
	35						Bottom of boring at 30 feet. Groundwater ~ 31 ft bgs.
	40						
	45						
	50						
	55						

3/8 Bentonite Hole Plug

← 5" →

LITHOLOGIC LOG AND MONITORING WELL CONSTRUCTION DIAGRAM



MONITOR WELL NO.: MW-1	TOTAL DEPTH: 57 Feet
SITE ID: EME A-12 Leak	CLIENT: RJCE Operating Company
CONTRACTOR: Harrison & Cooper, Inc.	COUNTY: Lea
DRILLING METHOD: Air Rotary	STATE: New Mexico
START DATE: 07/02/08	LOCATION: T205-R36E-Sec 12-Unit A
COMPLETION DATE: 07/02/08	FIELD REP.: G. Van Deventer
COMMENTS: Monitoring well located ~15 ft southeast of leak source. Latitude 32° 35' 29.9" N, Longitude 103° 18' 9.5 W	

Casing / Plug	Sample			Chloride (ppm)	PID (ppm)	USCS	LITHOLOGIC DESCRIPTION: LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
	Depth	Time	Type				
Cement 3/8" Bentonite Hole Plug 4" Sched 40 PVC Blank Casing 3/8" Bentonite Hole Plug Cement	5	1000	Split Spoon	114		SW	Fine sand, very pale orange (10YR 8/2) and grayish orange (10YR 7/4), subrounded, moderately sorted, unconsolidated, dry, no odor.
	10	1003	Split Spoon	321		SW	Fine sand, very pale orange (10YR 8/2), subrounded, moderately sorted, unconsolidated, dry, no odor.
20/40 Brady Silica Sand Pack 4" Diameter Screen with 0.010" Slots 20/40 Brady Silica Sand Pack	15	1006	Split Spoon	710		SW/CAL	Fine sand, very pale orange (10YR 8/2), with caliche, subrounded, moderately sorted, unconsolidated, dry, no odor. Lab chloride = 1170 mg/kg.
	20	1010	Split Spoon	553		SW/CAL	Fine sand, very pale orange (10YR 8/2), with caliche, subrounded, moderately sorted, unconsolidated, dry, no odor.
20/40 Brady Silica Sand Pack 4" Diameter Screen with 0.010" Slots 20/40 Brady Silica Sand Pack	25	1025	Split Spoon	716		SW	Fine sand, light brown (5YR 5/6), subrounded/subangular, moderately sorted, dry, no odor.
	30	1029	Split Spoon	616	36.7	SW	Fine- to medium-grained sand, light olive gray (5Y 5/2), subrounded, moderately well sorted, unconsolidated, slightly moist, slight HC odor. Lab results in mg/kg: chloride = 976, Benzene <0.1, Toluene <0.1, Ethylbenzene = 0.161, Xylenes = 0.706, GRO = 358, DRO = 1140.
	35					SW	
	40					SW	
	45					SW	
50					SW		
55					SW		
57							Bottom of monitoring well at 57 ft bgs

LITHOLOGIC LOG AND MONITORING WELL CONSTRUCTION DIAGRAM

MW-2

B-2

B-1

B-3

B-4

Line Leak
01/24/03

MW-1

MW-3

MONITOR WELL NO.: MW-2

TOTAL DEPTH: 45 Feet

SITE ID: EME A-12 Leak

CLIENT: RICE Operating Company

CONTRACTOR: Harrison & Cooper, Inc.

COUNTY: Lea

DRILLING METHOD: Air Rotary

STATE: New Mexico

START DATE: 07/02/08

LOCATION: T20S-R36E-Sec 12-Unit A

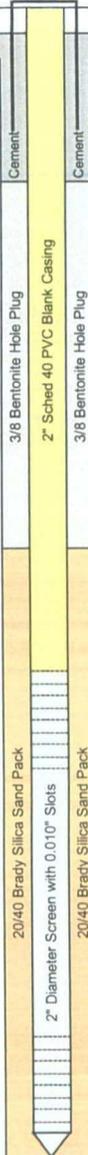
COMPLETION DATE: 07/02/08

FIELD REP.: G. Van Deventer

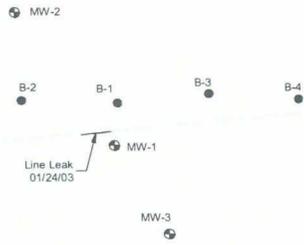
COMMENTS: Monitoring well located ~66 ft northwest of leak source.

Latitude 32° 35' 30.5" N, Longitude 103° 18' 9.9" W

Depth (ft)	Time	Sample Type	Chloride (ppm)	PID (ppm)	USCS	LITHOLOGIC DESCRIPTION:
						LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
5	1214	Split Spoon	118	0	SW	Sandy loam, dark yellowish brown (10YR 4/2), subrounded, well sorted, unconsolidated, dry, no odor.
5	1214	Split Spoon	118	0	SM/CAL	Very fine sand with some calcium carbonate in matrix, pale yellowish brown (10YR 6/2). Sand grains are rounded/subrounded, well sorted, unconsolidated, dry, no odor.
10	1217	Split Spoon	446	0	CAL	Caliche, chalky white, moderately hard, dry, no odor.
15	1221	Split Spoon	596	0	CAL	Caliche with some very fine sand, chalky white, moderately hard, dry, no odor.
20	1224	Split Spoon	780	0	SM/CAL	Fine sand, very pale orange (10YR 8/2), with caliche, subrounded, moderately sorted, unconsolidated, dry, no odor. Lab chloride = 1340 mg/kg.
25	1227	Cuttings	810		SW	Fine sand, light brown (5YR 5/6), subrounded/subangular, moderately sorted, dry, no odor.
30	1229	Cuttings	984		SW	Fine- to medium-grained sand, light brown (5YR 6/4), subrounded, moderately well sorted, unconsolidated, no odor.
45						Bottom of monitoring well at 45 ft bgs
50						
55						
60						

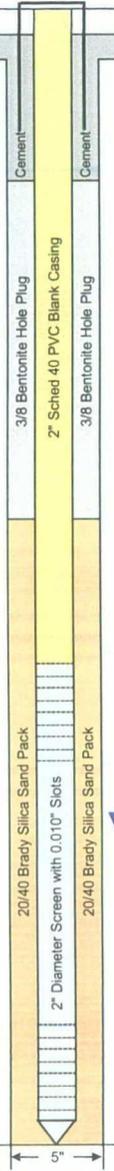


LITHOLOGIC LOG AND MONITORING WELL CONSTRUCTION DIAGRAM



MONITOR WELL NO.: MW-3	TOTAL DEPTH: 45 Feet
SITE ID: EME A-12 Leak	CLIENT: RICE Operating Company
CONTRACTOR: Harrison & Cooper, Inc.	COUNTY: Lea
DRILLING METHOD: Air Rotary	STATE: New Mexico
START DATE: 07/02/08	LOCATION: T20S-R36E-Sec 12-Unit A
COMPLETION DATE: 07/02/08	FIELD REP.: G. Van Deventer
COMMENTS: Monitoring well located ~66 ftsoutheast of leak source. Latitude 32° 35' 29.3" N, Longitude 103° 18' 9.2 W	

Depth (ft)	Sample		Chloride (ppm)	PID (ppm)	USCS	LITHOLOGIC DESCRIPTION: LITHOLOGY, COLOR, GRAIN SIZE, SORTING, ROUNDING, CONSOLIDATION, DISTINGUISHING FEATURES
	Time	Type				
0-5					SW	Sandy loam, dark yellowish brown (10YR 4/2), subrounded, well sorted, unconsolidated, dry, no odor.
5	1330	Split Spoon	88	0	SW	Fine sand, grayish orange pinkk (5YR 7/2), subrounded, moderately well sorted, unconsolidated, dry, no odor.
10	1332	Split Spoon	91	0	SM/CAL	Fine sand and soft caliche in matrix, very pale orange (10YR 8/2), subrounded, well sorted, unconsolidated, dry, no odor.
15	1335	Split Spoon	757	0	SM/CAL	Fine sand and soft caliche in matrix, very pale orange (10YR 8/2) and pale yellowish brown (10YR 6/2), subrounded, well sorted, unconsolidated, dry, no odor. Lab chloride = 848 mg/kg
20	1336	Split Spoon	602	0	SM/CAL	Fine sand and soft caliche in matrix, very pale orange (10YR 8/2) and grayish orange (10YR 7/4), subrounded, well sorted, unconsolidated, dry, no odor.
25	1340	Cuttings	444		SW	Fine sand, light brown (5YR 5/6), subrounded/subangular, moderately sorted, dry, no odor.
30	1342	Cuttings	821		SW/CAL	Fine sand, light brown (5YR 6/4) and very pale orange (10YR 8/2) with subangular nodules of caliche. Sand grains are subrounded, moderately well sorted, unconsolidated, slightly moist, no odor.
35					SW/CAL	
40					SW	
45						Bottom of monitoring well at 45 ft bgs
50						
55						
60						



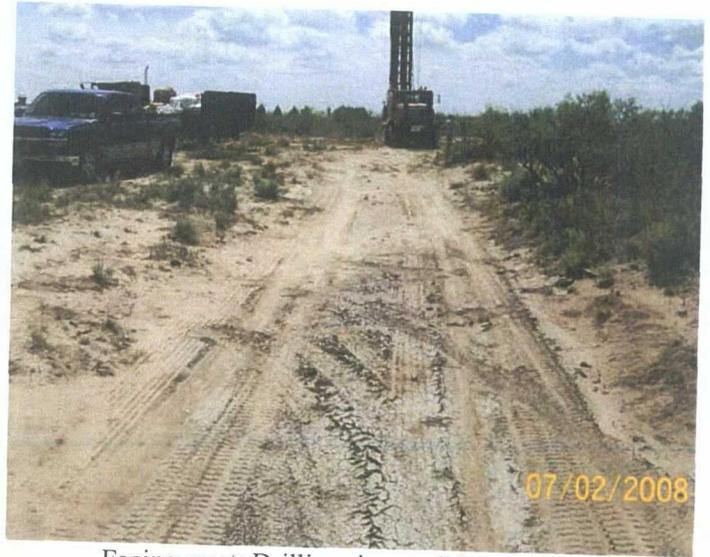
Appendix B

Photo Documentation

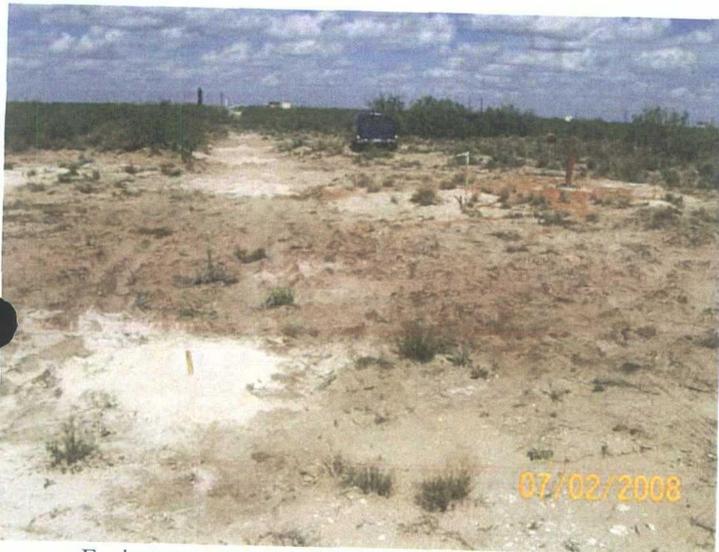
EME A-12 Line Leak Site (1R-0427-09)



Facing west: Soil boring B-1 (14' north and 10' east of leak).



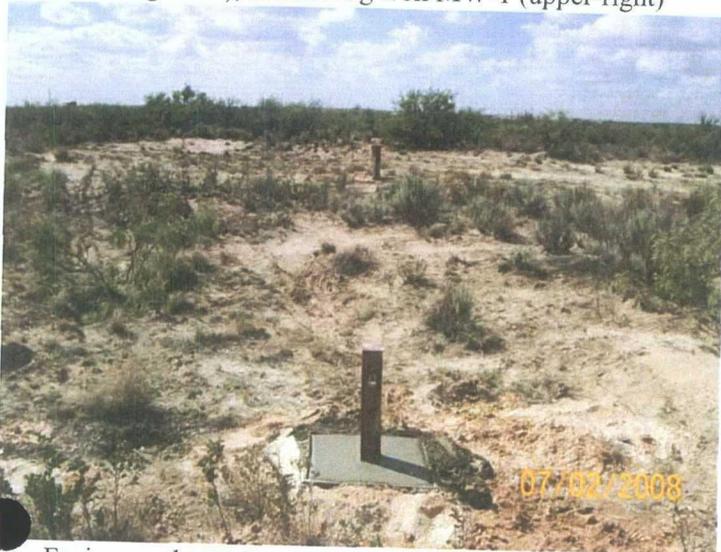
Facing west: Drilling rig at soil boring B-2



Facing east: Soil boring B-2 (plugged and staked in foreground), monitoring well MW-1 (upper-right)



Facing east: Drilling soil boring B-3, leak point (stake in foreground), and monitoring well MW-1 (right-center)



Facing southeast: Recently completed monitoring wells MW-2 (foreground) and MW-1 (background)



Facing northwest: Recently completed monitoring wells MW-3 (foreground) and MW-1 (background)

Appendix C

Laboratory Analytical Reports

and

Chain of Custody Documentation

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

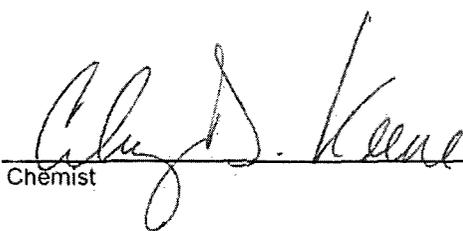
Receiving Date: 07/07/08
Reporting Date: 07/10/08
Project Number: NOT GIVEN
Project Name: EME A-12 LEAK
Project Location: EME A-12 LEAK

Sampling Date: 07/02/08
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: ML
Analyzed By: AB

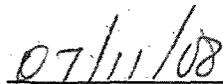
LAB NO.	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/kg)	DRO (>C ₁₀ -C ₂₈) (mg/kg)	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL BENZENE (mg/kg)	TOTAL XYLENES (mg/kg)
ANALYSIS DATE:		07/10/08	07/10/08	07/09/08	07/09/08	07/09/08	07/09/08
H15114-3	MW #1 @ 30'	358	1,140	<0.100	<0.100	0.161	0.706
H15114-7	SB #3 @ 5'	401	398	<0.100	0.345	0.672	4.55
H15114-8	SB #3 @ 10'	698	1,490	<0.100	1.02	0.942	4.30
H15114-9	SB #4 @ 5'	1,590	996	0.105	0.899	2.76	12.5
H15114-10	SB #4 @ 10'	2,100	2,200	2.44	1.10	3.08	14.6
H15114-11	SB #4 @ 15'	<10.0	<10.0	<0.100	<0.100	<0.100	<0.300
Quality Control		502	594	0.102	0.105	0.105	0.318
True Value QC		500	500	0.100	0.100	0.100	0.300
% Recovery		100	119	102	105	105	106
Relative Percent Difference		9.2	10.5	0.7	<0.1	2.8	1.4

METHODS: TPH GRO & DRO - EPA SW-846 8015 M; BTEX - SW-846 8021B.

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



Chemist



Date

H15114BT2



ARDINAL LABORATORIES

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

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

Receiving Date: 07/07/08
Reporting Date: 07/08/08
Project Number: NOT GIVEN
Project Name: EME A-12 LEAK
Project Location: EME A-12 LEAK

Analysis Date: 07/08/08
Sampling Date: 07/02/08
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: ML
Analyzed By: KS

LAB NUMBER	SAMPLE ID	Cl ⁻ (mg/kg)
H15114-1	SB #1 @ 20'	1,280
H15114-2	MW #1 @ 15'	1,170
H15114-3	MW #1 @ 30'	976
H15114-4	MW #2 @ 20'	1,340
H15114-5	MW #3 @ 15'	848
H15114-6	SB #2 @ 15'	720
H15114-7	SB #3 @ 5'	1,460
H15114-8	SB #3 @ 10'	496
H15114-9	SB #4 @ 5'	32
H15114-10	SB #4 @ 10'	128
H15114-11	SB #4 @ 15'	768
Quality Control		500
True Value QC		500
% Recovery		100
Relative Percent Difference		< 0.1

METHOD: Standard Methods 4500-Cl⁻B

Note: Analyses performed on 1:4 w:v aqueous extracts.

Chemist

07/09/08
Date

H15114 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: 03/03/10
 Reporting Date: 04/19/10*
 Project Number: NOT GIVEN
 Project Name: EME A-12 LEAK*
 Project Location: T20S-R36E-SEC12 A~ LEA CO., NM

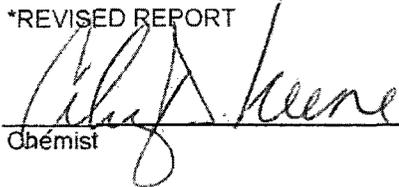
Sampling Date: 02/26/10
 Sample Type: WATER
 Sample Condition: COOL & INTACT
 Sample Received By: JH
 Analyzed By: ZL

LAB NUMBER	SAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE		03/08/10	03/08/10	03/08/10	03/08/10
H19367-1	MONITOR WELL #1	<0.001	<0.001	<0.001	<0.003
H19367-2	MONITOR WELL #2	<0.001	<0.001	<0.001	<0.003
H19367-3	MONITOR WELL #3	<0.001	<0.001	<0.001	<0.003
Quality Control		0.050	0.047	0.045	0.129
True Value QC		0.050	0.050	0.050	0.150
% Recovery		100	94.0	90.0	86.0
Relative Percent Difference		2.0	2.1	2.2	<1.0

METHOD: EPA SW-846 8021B

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

*REVISED REPORT



 Chemist



 Date

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Gil Van Deventer

From: "Gil Van Deventer" <gil@trident-environmental.com>
"Hansen, Edward J., EMNRD" <edwardj.hansen@state.nm.us>
Cc: "Haskell Conder" <hconder@riceswd.com>; "Katie Jones" <kjones@riceswd.com>
Sent: Friday, May 07, 2010 11:38 AM
Attach: EME A-12 CAP.pdf
Subject: Corrective Action Plan for the EME A-12 Line Leak Site (1R0463)

To: Edward Hansen, New Mexico Oil Conservation Division - Environmental Bureau

Subject: Corrective Action Plan

Site Name: EME A-12 Line Leak Site

NMOCD Case No.: 1R0463

Site Agent: RICE Operating Company

Site Location: T20S-R36E-Section 12, Unit Letter A, Lea County, New Mexico

Mr. Hansen:

Attached is the *Corrective Action Plan* for the EME A-12 Line Leak Site (1R0463). One complete hard copy and one copy on compact disk will be sent to you via USPS Certified Mail (# 7010 0290 0003 1264 9109) today. If you have any questions please contact Hack Conder at 575-393-9174.

Thank you,
Gil



Gilbert J. Van Deventer, PG, REM
Trident Environmental
P. O. Box 7624, Midland TX 79708
Work/Mobile: 432-638-8740
Fax: 413-403-9968
Home: 432-682-0727

