AP-59

2013 Annual Report

DATE March 31, 2014

From: <u>L Peter Galusky</u>
To: <u>Lowe, Leonard, EMNRD</u>

Cc: VonGonten, Glenn, EMNRD; Katie Jones; Laura Flores; Hack Conder

Subject: Rice Operating Company Annual Report for NMOCD No. AP-59 Vacuum F&G 35 SWDs

Date: Monday, March 31, 2014 10:10:57 AM

Attachments: Vacuum F-35 and G-35 (AP-59) 2013 RY Annual Report 03.31.2014s.pdf

Mr. Lowe,

Attached is the 2013 Annual Groundwater Report for Vacuum F&G 35 SWDs. Annual Reports are submitted yearly to update the NMOCD about groundwater quality for a particular site. This report does not require NMOCD approval; therefore, a flow chart is not included.

Please contact either myself or Hack Conder of Rice Operating Company if you have any questions or need additional information.

Thank you.

Sincerely,

Pete G.

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L. Peter (Pete) Galusky, Jr. P.E. Principal Environmental Engineer

Texerra LLCCell: 719-339-6791

E-mail: lpg@texerra.com
Web: www.texerra.com

L. Peter Galusky, Jr. Ph.D., P.G.

Texerra LLC

20055 Laredo Lane Monument, CO 80132 Tel: 719-339-6791 E-mail: lpg@texerra.com

March 31st, 2014

Mr. Leonard Lowe

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

Re: 2013 Annual Report

Vacuum F-35 & G-35 SWDs, Sec 35, T17S, R35E

OCD Case No. AP-59

Mr. Lowe:

This letter summarizes the results of groundwater monitoring over the past year pursuant to the NMOCD approved Abatement Plan for Rice Operating Company (ROC)'s Vacuum F&G-35 project. Site and monitor well locations are given in the Appendix (Figures 1 & 2, respectively). In brief:

Vacuum F-35

- Groundwater chloride concentrations in the at-source monitor well (MW-1) continued their decline from the past several years (Appendix Figure 3a), dropping to an average of 270 mg/l in 2013 versus an average of 655 mg/l in 2012. There has been no significant change in groundwater chlorides in the down-gradient well, MW-3S (shallow) and MW-3D (deep), averaging 172 mg/l and 38 mg/l, respectively, for 2013 and indicating that the magnitude of up-gradient chloride mass being diluted is apparently small.
- BTEX concentrations in MW-1 (Appendix Figure 3b) equaled .182 mg/l, which is substantially below their historic high value of 5.941 mg/l measured in March 2005 and indicating that dissolved hydrocarbons appear to be a diminishing concern at this location.

Vacuum G-35

• Groundwater chloride concentrations in the at-source monitor well (MW-1) and the down-gradient monitor well (MW-4) continued their decline from the past several years, averaging 68 mg/l and 138 mg/l for 2013 (Appendix - Figure 4a). Chloride concentrations in the down-gradient well MW-3S (shallow) dropped from 715 mg/l in 2012 to 545 mg/l in 2013. Chloride concentrations in the down-gradient well MW-3D (deep) ended the year at 985 mg/l which is essentially unchanged from 990 mg/l in 2012.

Rice Operating Company - Vacuum F&G 35 2013 Annual Report

• Total BTEX concentrations (Appendix - Figure 4b) continued their decline in the atsource well (MW-1), averaging .0570 mg/l in 2013 versus 0.1165 mg/l in 2012. Total BTEX concentrations in the near-source down-gradient well (MW-4) returned to a pattern of decline, averaging 0.3595 in 2013 versus 1.0080 in 2012.

In summary, it appears that chloride is attenuating through dilution of a relatively small original mass and that BTEX is gradually being reduced through natural microbial metabolism.

ROC will continue to monitor groundwater semi-annually (two sampling events) through 2014, paying particular attention to BTEX concentrations in MW-4 at the G-35 location. Upon analysis of this additional data, we will consider if a change in course of action is warranted. As it presently stands, it appears that natural attenuation (dilution) will effectively reduce groundwater chloride concentrations at the affected locations and that the chloride mass is sufficiently small so that down-gradient impacts will be negligible.

ROC is the service provider (agent) for the Vacuum SWD System and has no ownership of any portion of the pipeline, well, or facility. The System is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis.

We appreciate your consideration of this Annual Report. Please do not hesitate to contact either Rice Operating Company or myself if you have any questions or need additional information.

Sincerely,

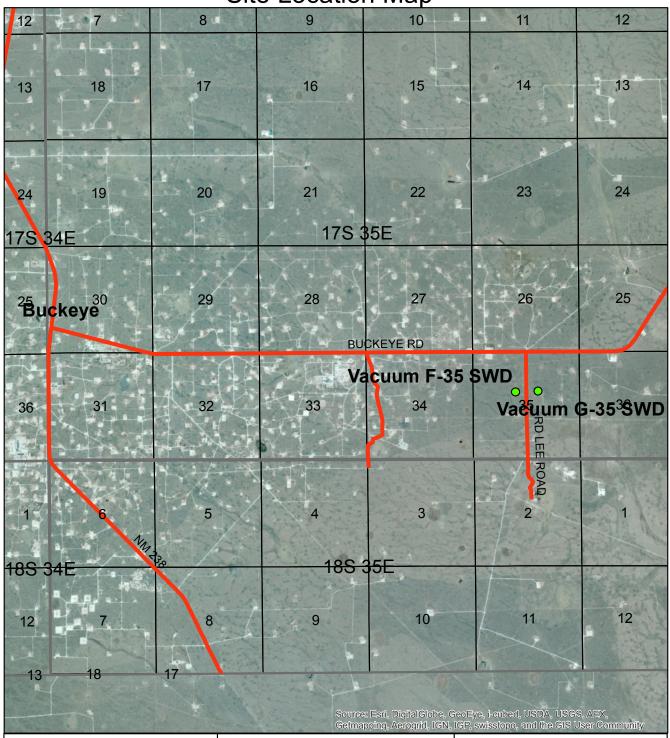
L. Peter Galusky, Jr. Ph.D.

Copy: Glenn VonGonten, NMOCD; Rice Operating Company

Attachments: Appendix

Texerra LLC 2

Site Location Map

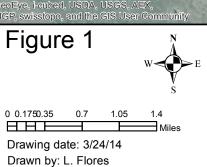




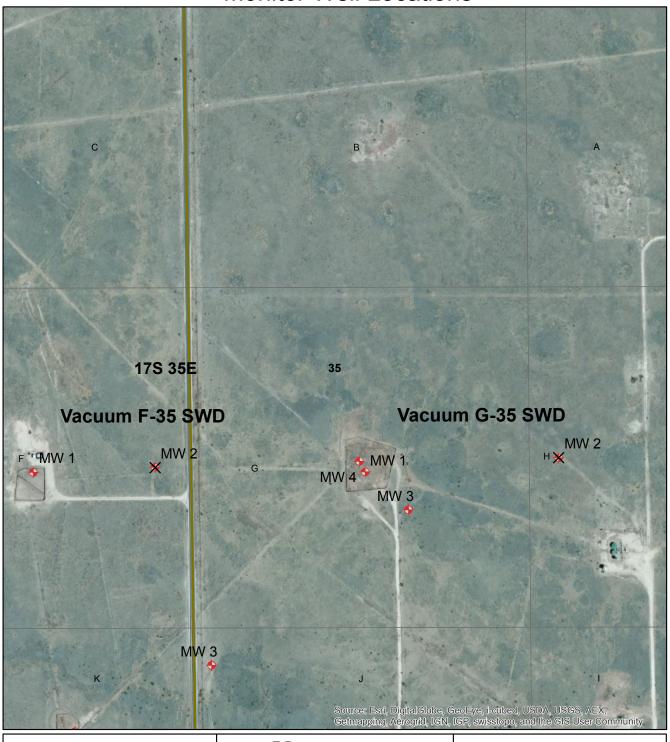
Vacuum F-35 SWD & G-35 SWD

Legals: UL/F, G sec. 35 T17S R35E

NMOCD Case #: AP-59



Monitor Well Locations

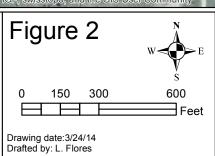


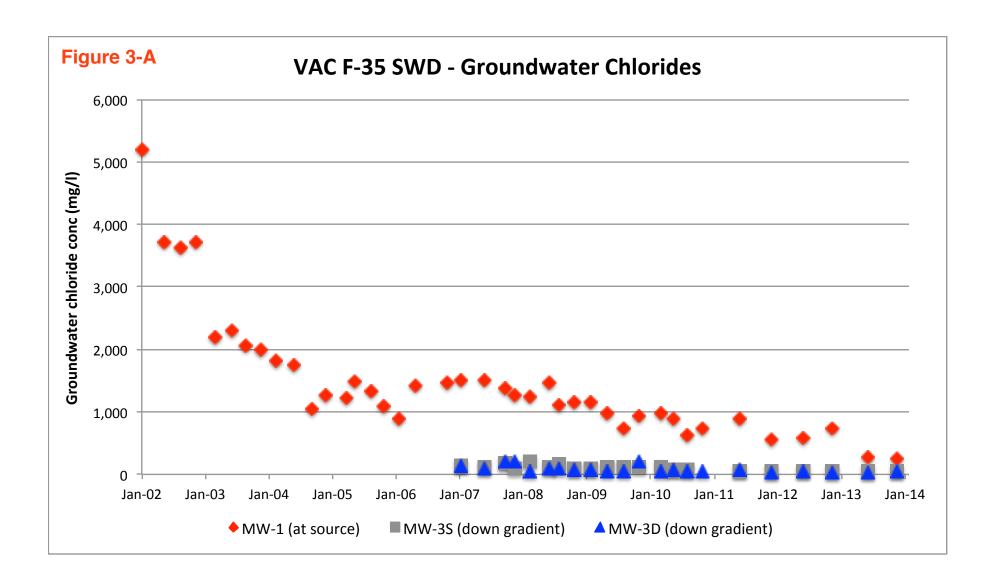


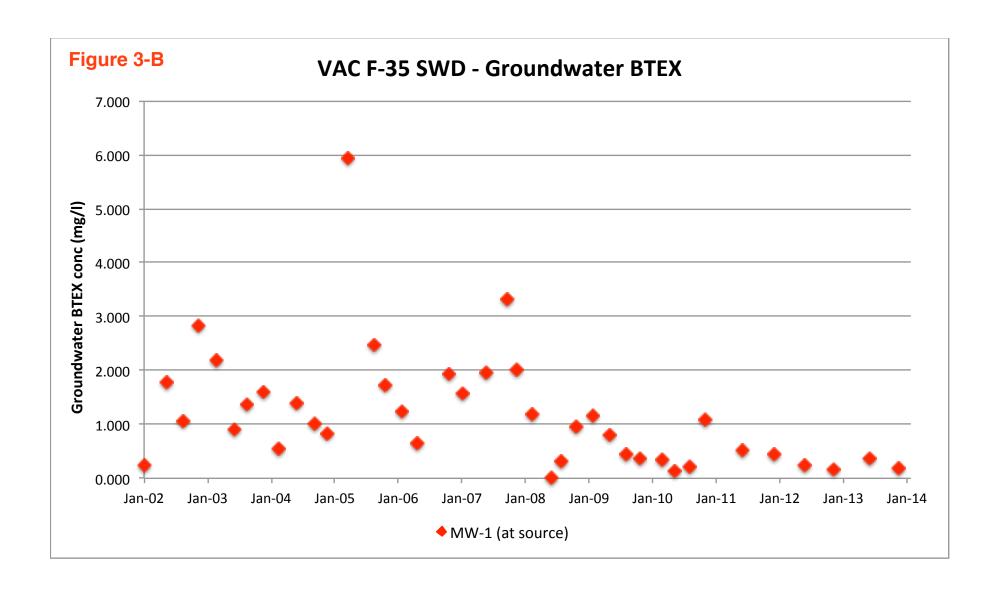
Vacuum F-35 SWD & G-35 SWD

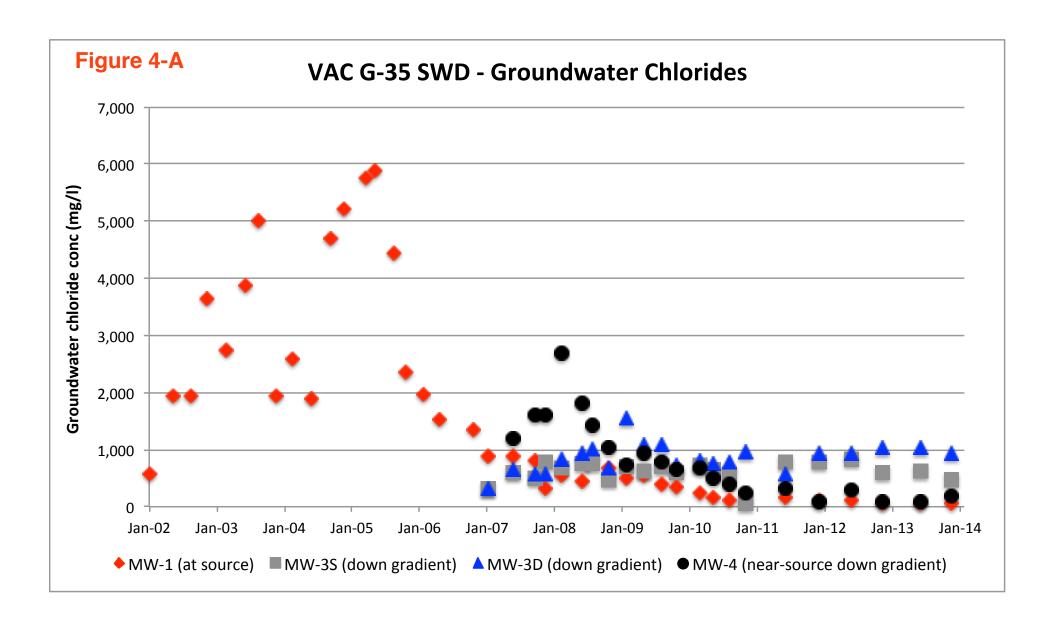
Legals: UL/F, G sec. 35 T17S R35E

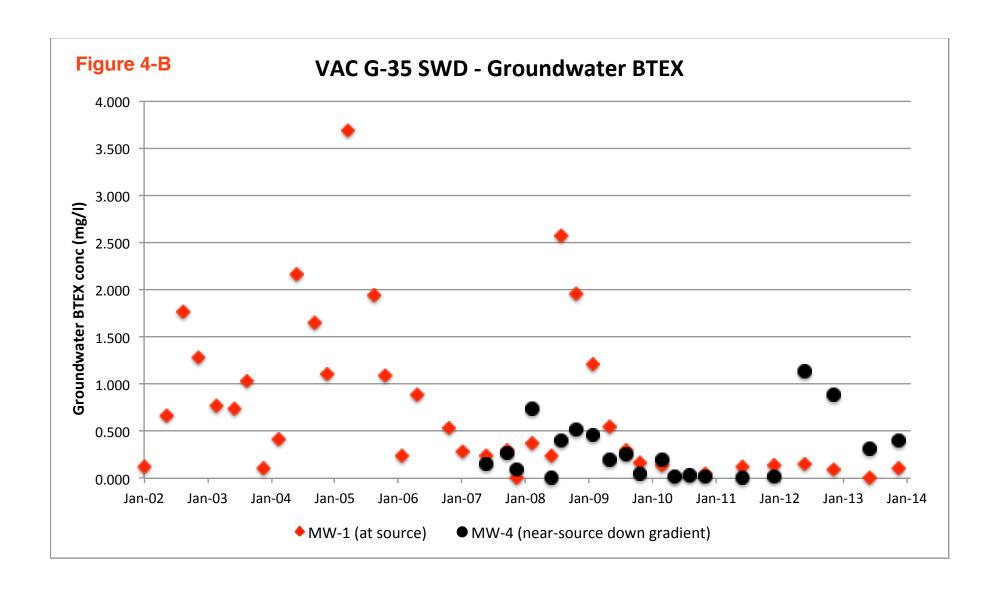
NMOCD Case #: AP-59













November 26, 2013

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

RE: VACUUM F-35 SWD AND G-35 SWD

Enclosed are the results of analyses for samples received by the laboratory on 11/20/13 12:16.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/ga/lab accredited certif.html.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2 Haloacetic Acids (HAA-5)
Method EPA 524.2 Total Trihalomethanes (TTHM)
Method EPA 524.4 Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

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This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Mike Snyder

Organic Supervisor



Rice Operating Company

Hack Conder 112 W. Taylor Hobbs NM, 88240

Fax To: (575) 397-1471

Received: 11/20/2013 Reported: 11/26/2013

VACUUM F-35 SWD AND G-35 SWD

Project Number: NOT GIVEN

Project Name:

Project Location: T17S-R35E-SEC35 F & G -LEA CTY, NM

Sampling Date: 11/18/2013 Sampling Type: Water

Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: F-35 SWD MONITOR WELL #1 (H302830-01)

BTEX 8021B	mg,	'L	Analyze	d By: MS					S-04
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	0.040	0.001	11/24/2013	ND	0.056	113	0.0500	0.721	
Toluene*	0.015	0.001	11/24/2013	ND	0.056	111	0.0500	0.0556	
Ethylbenzene*	0.064	0.001	11/24/2013	ND	0.055	111	0.0500	0.123	
Total Xylenes*	0.063	0.003	11/24/2013	ND	0.163	108	0.150	0.0111	
Total BTEX			11/24/2013	ND					
Surrogate: 4-Bromofluorobenzene (PIL	,		6						
Chloride, SM4500CI-B	mg,	′L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride*	260	4.00	11/25/2013	ND	100	100	100	0.00	
Sulfate 375.4	mg,	′L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Sulfate*	26.2	10.0	11/25/2013	ND	17.8	89.0	20.0	4.72	
TDS 160.1	mg,	'L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
TDS*	810	5.00	11/25/2013	ND	245			0.0480	

Cardinal Laboratories *=Accredited Analyte

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Rice Operating Company

Hack Conder 112 W. Taylor Hobbs NM, 88240

Fax To: (575) 397-1471

Received: 11/20/2013 Reported: 11/26/2013

Project Name: VACUUM F-35 SWD AND G-35 SWD

Project Number: NOT GIVEN

Project Location: T17S-R35E-SEC35 F & G -LEA CTY, NM

Sampling Date: 11/17/2013 Sampling Type: Water

Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: F-35 SWD MONITOR WELL #3-SHALLOW (H302830-02)

Chloride, SM4500CI-B	mg	/L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride*	52.0	4.00 11/25/2013		ND	100	100	100	0.00	
Sulfate 375.4	mg,	/L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Sulfate*	60.5	10.0	11/25/2013	ND	17.8	89.0	20.0	4.72	
TDS 160.1	mg,	/L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
TDS*	380	5.00	11/25/2013	ND	245			0.0480	

Sample ID: F-35 SWD MONITOR WELL #3-DEEP (H302830-03)

Chloride, SM4500CI-B	mg	/L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride*	44.0	4.00	11/25/2013	ND	100	100	100	0.00	
Sulfate 375.4	mg	/L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Sulfate*	60.3	10.0	11/25/2013	ND	17.8	89.0	20.0	4.72	
TDS 160.1	mg	/L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
TDS*	343	5.00	11/25/2013	ND	245			0.0480	

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Rice Operating Company

Hack Conder 112 W. Taylor Hobbs NM, 88240

Fax To: (575) 397-1471

Received: 11/20/2013

Reported: 11/26/2013
Project Name: VACUUM F-35 SWD AND G-35 SWD

Project Number: NOT GIVEN

Project Location: T17S-R35E-SEC35 F & G -LEA CTY, NM

Sampling Date: 11/18/2013 Sampling Type: Water

Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: G-35 SWD MONITOR WELL #1 (H302830-04)

BTEX 8021B	mg/	L	Analyze	d By: MS							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier		
Benzene*	0.022	0.001	11/24/2013	ND	0.056	113	0.0500	0.721			
Toluene*	0.002	0.001	11/24/2013	ND	0.056	111	0.0500	0.0556			
Ethylbenzene*	0.080	0.001	11/24/2013	ND	0.055	111	0.0500	0.123			
Total Xylenes*	0.007	0.003	11/24/2013	ND	0.163	108	0.150	0.0111			
Total BTEX	0.112	0.006	11/24/2013	ND							
Surrogate: 4-Bromofluorobenzene (PIL	109 9	6 89.5-12	6								
Chloride, SM4500CI-B	mg/	L	Analyze	d By: AP							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier		
Chloride*	64.0	4.00	11/25/2013	ND	100	100	100	0.00			
Sulfate 375.4	mg/	L	Analyze	d By: AP							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier		
Sulfate*	40.1	10.0	11/25/2013	ND	17.8	89.0	20.0	4.72			
TDS 160.1	mg/	L	Analyze	d By: AP							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier		
TDS*	Analyte Result Reporting 425 5.00		11/25/2013	ND	245		0.0480				

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Rice Operating Company

Hack Conder 112 W. Taylor Hobbs NM, 88240

Fax To: (575) 397-1471

Received: 11/20/2013 Reported: 11/26/2013

Project Name: VACUUM F-35 SWD AND G-35 SWD

Project Number: NOT GIVEN

Project Location: T17S-R35E-SEC35 F & G -LEA CTY, NM

Sampling Date: 11/17/2013 Sampling Type: Water

Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: G-35 SWD MONITOR WELL #3 - SHALLOW (H302830-05)

Chloride, SM4500CI-B	mg	/L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride*	460	4.00	11/25/2013	ND	100	100	100	0.00	
Sulfate 375.4	mg	/L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Sulfate*	35.9	10.0	11/25/2013	ND	17.8	89.0	20.0	4.72	
TDS 160.1	mg	/L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
TDS*	1200	5.00	11/25/2013	ND	245				

Sample ID: G-35 SWD MONITOR WELL #3-DEEP (H302830-06)

Chloride, SM4500Cl-B	mg	/L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride*	930	4.00	11/25/2013	ND	100	100	100	0.00	
Sulfate 375.4	mg	/L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Sulfate*	29.0	10.0	11/25/2013	ND	17.8	89.0	20.0	4.72	
TDS 160.1	mg	/L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
TDS*	2090	5.00	11/25/2013	ND	245			0.0480	

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Rice Operating Company

Hack Conder 112 W. Taylor Hobbs NM, 88240

Fax To: (575) 397-1471

Received: 11/20/2013

Reported: 11/26/2013
Project Name: VACUUM F-35 SWD AND G-35 SWD

Project Number: NOT GIVEN

Project Location: T17S-R35E-SEC35 F & G -LEA CTY, NM

Sampling Date: 11/18/2013 Sampling Type: Water

Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: G-35 SWD MONITOR WELL #4 (H302830-07)

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BTEX 8021B	mg/	L	Analyze	d By: MS										
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier					
Benzene*	0.118	0.001	11/24/2013	ND	0.056	113	0.0500	0.721						
Toluene*	0.050	0.001	11/24/2013	ND	0.056	111	0.0500	0.0556						
Ethylbenzene*	0.195	0.001	11/24/2013	ND	0.055	111	0.0500	0.123						
Total Xylenes*	0.043	0.003	11/24/2013	ND	0.163	108	0.150	0.0111						
Total BTEX	0.407 0.006 1:		11/24/2013	ND										
Surrogate: 4-Bromofluorobenzene (PIL	gate: 4-Bromofluorobenzene (PIE 105 % 89.5-12		6											
Chloride, SM4500Cl-B	mg/	'L	Analyze	d By: AP										
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier					
Chloride*	180	4.00	11/25/2013	ND	100	100	100	0.00						
Sulfate 375.4	mg/	'L	Analyze	d By: AP										
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier					
Sulfate*	23.3	10.0	11/25/2013	ND	17.8	89.0	20.0	4.72						
TDS 160.1	mg/	'L	Analyze	d By: AP										
Analyte	Result Reporting Limit		Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier					
TDS*			11/25/2013	ND	245			0.0480						

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Notes and Definitions

S-04 The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.

ND Analyte NOT DETECTED at or above the reporting limit

RPD Relative Percent Difference

** Samples not received at proper temperature of 6°C or below.

*** Insufficient time to reach temperature.

Chloride by SM4500Cl-B does not require samples be received at or below 6°C

Samples reported on an as received basis (wet) unless otherwise noted on report

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H302836		(G)rab or	# CONTAINERS	WATER	SOIL	AIR	SLUDGE	HCL (2 dominos)	HNO.	NaHSO₄	H ₂ SO ₄	ICE (1-1Liter HDPE)	NS N	DATE (2013)	TIME	MTBE 8021B/602	BTEX 8021B/602	TPH 418.1/		킬[달	TCLP Volatiles	TCLP Semi Volatiles	TCLP Pesticides	낊	GC/MS Vol. 8260B/624	5	PCB's 8082/608	Pesticides 8081A/608	Moisture Content		Anie	Sulfates	Total Dissolved Solids	
1	F-35 SWD Monitor Well #1	G	3	х				2	_			1	1	1/18	13:15		х		T		Γ							T	T	T	_	_	-	x
2	F-35 SWD Monitor Well #3-Shallow	G	1	x		П	T					1	1	1/17	10:50			T	Т	Т	Г						\Box	Т	Т	Т	П	х	х	х
3	F-35 SWD Monitor Well #3-Deep	G	1	х								1	1	1/17	11:00				T	T							\top	\top	T	T	\Box	x	_	х
५	G-35 SWD Monitor Well #1	G	3	X		П		2	2			1	1	1/18	9:40		х		Т	Т								Т	Т	Т	П	х	x	x
5	G-35 SWD Monitor Well #3-Shallow	G	1	х								1	1	1/17	14:20												T	Т	Т	T	П	Х	x	x
6	G-35 SWD Monitor Well #3-Deep	G	1	х								1	1	1/17	14:30													ightharpoons	Τ	Τ	П	х	x	х
77)	G-35-8WD Monitor Well #4	G	3	X				2	2			1	1	11/18	11:30		х											Т	Т	T	П	x	χ	X.
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Rozanne Johnson	1/20/2013 12:15	ł														Fax	Res	ılts		Г	Ye	s	П	No		Add	itiona	al Fa	x N	umb	er:			
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Delivered By:	(Circle One)	Sample Condition CHECKED BY:						l											ice-e			m				,								
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Sampler - l	JPS - Bus - Other:	l	No		No	П				إرما	VV	- W																						

rozanne11@windstream.net