

## Venegas, Victoria, EMNRD

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**From:** Venegas, Victoria, EMNRD  
**Sent:** Monday, March 8, 2021 2:12 PM  
**To:** Vallejo, Tony  
**Subject:** RE: Requesting C-147 Variance COA revision for 10% filling section

Hi Tony,

The conditions of approval require Chevron to fill up the containment in increments of 10% of total capacity. 75 000 bbls are in the 10% range  $\pm$  a small margin of error. This is what I found using the total capacity value in the corresponding C-147:

1RF-11 Salado Draw Section 23 Recycling Facility and Containment	75000 bbl = 10.7 %
1RF-13 Salado Draw Section 13 Recycling Containments Structure	75000 bbl = 11.6%
2RF-107 Hayhurst Sections 9 and 10 Recycling Facility	75000 bbl = 10.7%
2RF-120 Hayhurst NM Section 2 Frac Pond and Recycle Facility	75000 bbl = 12.7%

Chevron can refill the containments above mentioned using 75000 bbl of fluid.

Chevron will maintain the liquid level for each 75000 bbl volume increase for 24 hours and inspect and operation the leak detection system at the end of the 24-hour period. If there are no liquids present in the leak detection system, Chevron may proceed to fill the next 75000 bbl volume and repeat the process until the containment full design capacity minus the 3-feet of freeboard is reached.

Please let me know if you have any other questions.

Best,

**Victoria Venegas** • Environmental Specialist

Environmental Bureau

EMNRD - Oil Conservation Division

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**From:** Vallejo, Tony <JVallejo@chevron.com>  
**Sent:** Monday, March 1, 2021 9:50 AM  
**To:** Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>  
**Subject:** [EXT] Requesting C-147 Variance COA revision for 10% filling section

Good morning Victoria,

MCBU is requesting OCD approval for a minor change to the COA for the 10% filling of all C-147 Variance registrations in NM (2RF-107, 2RF-120, 1RF-11, and 1RF-13). See request below and advise at your earliest convenience whether it will be approved or denied!

We only have one supplier in HHNM that can supply us with 75,000 bwpd. Rather than refill based on percentage, would OCD would approve us to refill based on volume instead?

Getting the RWCS's refilled would be way easier to keep track of if we could just alternate putting 75,000 bbls into each cell. This would make record keeping more efficient and still meet OCD's intent of periodically allowing the ponds to sit for 24 hour increments to check for leaks. For example, we'd fill HHNM Section 9 East with 75,000 bbls of water. Then switch the supplier to HHNM Section 9 West the next day to fill 75,000 bbls while also allowing 9 East to sit for 24 hours so that we could check for leaks. We'd just alternate back and forth until all the ponds are full. Percentage is harder because we're somewhat limited by supplier and also the pond capacities aren't nice round numbers.

Copy below of COA from HHNM (2RF-107) for filling RWCS

Chevron will provide written notice to the OCD (email to [ocd.enviro@state.nm.us](mailto:ocd.enviro@state.nm.us)) at least 72 hours, but no more than one week, prior to the recommencement of operations. Recommencement of recycling operations means that the operator plans to resume moving fluids through the containment and discharging fluids from the containment.

- At the resumption of recycling operations, Chevron is required to perform an incremental fluid level test for containment liquid levels above the minimum liquid level.

- Chevron will fill the containment. Chevron will pause filling operations at every 10% of total fluid capacity above the minimum level.

- Chevron will maintain the liquid level for each 10% volume increase for 24 hours and inspect and operation the leak detection system at the end of the 24-hour period.

- ❖ If there are no liquids present in the leak detection system, Chevron may proceed to fill the next 10% volume and repeat the process until the containment full design capacity minus the 3-feet of freeboard is reached. eat the process until the containment full de reached.

- ❖ If liquids are

**Thank you,  
Tony Vallejo**

**Sr. Workforce Safety & Environmental Specialist - Factory**

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**Safety is as simple as ABC - Always Be Careful**