



Jason Michelson
Project Manager

**Chevron Environmental
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May 30, 2019

New Mexico Oil Conservation Division, District II
811 S. First St
Artesia, NM 88210

**Re: South Culebra Bluff 13 Well No. 4
Site Deferral Request
Inspection No. iTM1734233912
Eddy County, New Mexico**

Dear whom it concerns,

Please find enclosed for your files, copies of the following:

- South Culebra Bluff 13 Well No. 4 – May 30, 2019 Site Deferral Request

The Site Deferral Request was prepared by Arcadis U.S., Inc. (Arcadis) on behalf of Chevron Environmental Management Company (CEMC). CEMC is requesting written NMOCD approval for deferral of additional site remediation activities until the well and associated facilities are abandoned.

Please do not hesitate to call Rebecca Andresen with Arcadis at 206-726-4717 or myself at 832-854-5601, should you have any questions.

Sincerely,

Jason Michelson
Jason Michelson

Encl. South Culebra Bluff 13 Well No. 4 - Site Deferral Request

C.C. Brett Krehbiel, Arcadis

Mr. Rob Hamlet
New Mexico Oil Conservation Division – District II
Environmental Specialist
811 S. First St.
Artesia, NM 88210

Arcadis U.S., Inc.
630 Plaza Drive
Suite 100
Highlands Ranch
Colorado 80129
Tel 720 344 3500
Fax 720 344 3535
www.arcadis.com

Subject:
Site Deferral Request
South Culebra Bluff 13 Well No. 4
Inspection No. iTM1734233912
Eddy County, New Mexico

ENVIRONMENT

Date:
May 30, 2019

Dear Mr. Hamlet:

Contact:
Rebecca Andresen

On behalf of Chevron Environmental Management Company (CEMC), Arcadis U.S., Inc. (Arcadis) prepared this Site Deferral Request (Request) for the South Culebra Bluff 13 Well No. 4, API No. 30-015-26534, located in Eddy County, New Mexico. Rockcliff Operating New Mexico LLC (Rockcliff), the previous owner of this well, was notified by the New Mexico Oil Conservation District (NMOCD) of a staining violation dated December 8, 2017 during an inspection (iTM1734233912, Attachment 1) by NMOCD. No response to this violation has been located. The purpose of this request is for written confirmation of deferral from the NMOCD.

Phone:
206-726-4717

Email:
Rebecca.Andresen@arcadis
.com

Our ref:
B0049810.0000

SITE DESCRIPTION AND BACKGROUND

The Site is located approximately two (2) miles east of Loving, New Mexico. The site is in Unit D, Section 13, Township 23S, Range 28E, Eddy County, New Mexico.

On December 8, 2017, during a routine inspection (iTM1734233912) conducted by NMOCD, staining was observed around the well head. A letter of violation was issued to Rockcliff. No response to this violation has been located.

This well is planned for plugging and abandonment. Site restoration activities will be conducted in conjunction with abandonment. Therefore, deferral of remediation until the well and associated facilities are abandoned.

Mr. Rob Hamlet
May 30, 2019

If you have any questions or comments, please contact Rebecca Andresen at 206.726.4717 or by email at rebecca.andresen@arcadis.com.

Sincerely,

Arcadis U.S., Inc.



Rebecca Andresen
Vice President

Copies:

Jason Michelson, Chevron/ CEMC
Brett Krehbiel, Arcadis

Enclosures:

Attachments

1 – December 8, 2017 Letter of Violation

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

Ken McQueen
Cabinet Secretary

Matthias Sayer
Deputy Cabinet Secretary

David Catanach
Division Director



Response Required - Deadline Enclosed

Field Inspection Program
"Preserving the Integrity of Our Environment"

08-Dec-17

ROCKCLIFF OPERATING NEW MEXICO LLC

1301 McKinney Suite 1300
Houston TX 77010-7010

LETTER OF VIOLATION - Inspection

Dear Operator:

The following inspection(s) indicate that the well, equipment, location or operational status of the well(s) failed to meet standards of the New Mexico Oil Conservation Division as described in the detail section below. To comply with standards imposed by Rules and Regulations of the Division, corrective action must be taken immediately and the situation brought into compliance. The detail section indicates preliminary findings and/or probable nature of the violation. This determination is based on an inspection of your well or facility by an inspector employed by the Oil Conservation Division on the date(s) indicated.

Please notify the proper district office of the Division, in writing, of the date corrective actions are scheduled to be made so that arrangements can be made to reinspect the well and/or facility.

INSPECTION DETAIL SECTION

SOUTH CULEBRA BLUFF UNIT				No.005	L-13-23S-28E	30-015-22922-00-00	
Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.	
12/08/2017	Routine/Periodic	Tony Morales	Yes	No	3/13/2018	iTM1734235827	
Violations							
General Housekeeping (Rule 114)							
Comments on Inspection: OK. All Equipment and Location in Good Shape. PJ. STAINING AROUND WELL HEAD / TANK BATTERIES DRAIN NO WINDSOCK 19.15.10.8							
SOUTH CULEBRA BLUFF 14 No.001					A-14-23S-28E	30-015-26347-00-00	
Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.	
12/08/2017	Routine/Periodic	Tony Morales	Yes	No	3/13/2018	iTM1734233520	
Violations							
General Housekeeping (Rule 114)							
Comments on Inspection: OK. All Equipment and Location in Good Shape. PJ. POWER OFF STAINING AROUND WELL HEAD							

SOUTH CULEBRA BLUFF 13 No.004

D-13-23S-28E

30-015-26534-00-00

Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
12/08/2017	Routine/Periodic	Tony Morales	Yes	No	3/13/2018	iTM1734233912
Violations General Housekeeping (Rule 114)						
Comments on Inspection: OK. All Equipment and Location in Good Shape. 19.15.10.8				PJ. STAINING AROUND WELL HEAD		

SCB 13 FEDERAL No.008

C-13-23S-28E

30-015-33645-00-00

Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
12/08/2017	Routine/Periodic	Tony Morales	Yes	No	3/13/2018	iTM1734236619
Violations General Housekeeping (Rule 114)						
Comments on Inspection: OK. All Equipment and Location in Good Shape. 19.15.10.8				PJO. STAINING AROUND WELL HEAD		

TELEDYNE 12 FEDERAL**No.003**

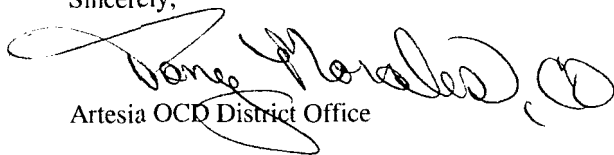
E-12-23S-28E

30-015-33927-00-00

Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
12/08/2017	Routine/Periodic	Tony Morales	Yes	No	3/13/2018	iTM1734238246
Violations General Housekeeping (Rule 114)						
Comments on Inspection: OK. All Equipment and Location in Good Shape. WELL HEAD 19.15.10.8				PJ. HEAD OFF STAINING AROUND		

In the event that a satisfactory response is not received to this letter of direction by the "Corrective Action Due By:" date shown above, further enforcement will occur. Such enforcement may include this office applying to the Division for an order summoning you to a hearing before a Division Examiner in Santa Fe to show cause why you should not be ordered to permanently plug and abandon this well.

Sincerely,



Artesia OCD District Office

Note: Information in Detail Section comes directly from field inspector data entries - not all blanks will contain data.
*Significant Non-Compliance events are reported directly to the EPA, Region VI, Dallas, Texas.