



**RECEIVED**

*By JKeyes at 7:55 am, Jun 15, 2016*

June 10, 2016

**NOT APPROVED**

Reference No. 074633

New Mexico Oil Conservation Division  
District 1  
Jamie Keyes  
1625 North French Drive  
Hobbs, New Mexico 88240

A determination for deferment cannot be made at this time. The delineation points designated SB-2 and SB-4 have not been adequately defined. Please complete the vertical delineation of these two points and provide the reported ground water depth from MW-12 and TW-23.

**Re: Soil Assessment and Delineation Activities Report - Addendum  
Vacuum Grayburg West Unit Satellite No. 4 Injection  
RP No. 3941  
Unit B, Section 1, Township 18 South, Range 34 East  
Lea County, New Mexico**

Dear Mr. Keyes:

GHD Services Inc. (GHD) is providing this letter on behalf of Chevron Environmental Management Company (CEMC). This letter serves as an Addendum to the Soil Assessment and Delineation Activities Report dated September 28, 2015 that was prepared by GHD. The site is the Vacuum Grayburg West Unit Satellite No. 4 Injection location (Site) located in Unit B, Section 1, Township 18 South, Range 34 East, approximately 1.38-miles southwest of Buckeye, New Mexico, in eastern Lea County.

Evaluation of the analytical data obtained from soil assessment and delineation activities performed in March 2014 and August 2015 indicated that a moderate level of chloride concentrations remain in the subsurface. However, it is noted that chloride concentrations are decreasing with depth. The Recommended Remediation Action Levels (RRALs) to be applied to this location by the New Mexico Oil Conservation Division (NMOCD) are:

- 10 milligram per kilogram (mg/kg) for benzene;
- 50 mg/kg for total benzene, toluene, ethylbenzene, and xylenes;
- <sup>1000</sup>~~5,000~~ mg/kg for TPH; and
- 500 mg/kg for chlorides.

These concentrations have been delineated both vertically and horizontally in the subsurface. The data from the soil boring program demonstrates that the nature and extent of chloride impacts to soil are minimal and the potential risk to impact groundwater is extremely low.

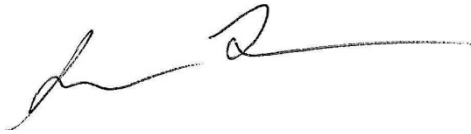
This site was discussed during a meeting that was held on November 10, 2015 that included the NMOCD, CEMC, and GHD. Based on our discussions during this meeting CEMC is requesting to

defer remedial work at this site until production operations cease and abandonment/closure and site reclamation is required at the Site.

If you have any questions concerning this report please contact us at (713) 734-3090.

Sincerely,

GHD Services, Inc.

A handwritten signature in black ink, appearing to read 'Scott Foord', with a long horizontal flourish extending to the right.

Scott Foord  
Project Manager

SF/cm/1