

Jason Michelson Project Manager Chevron Environmental Management Company 1500 Louisiana Street, #38116 Houston, Texas 77002 Work: 832-854-5601 Cell: 281-660-8564 jmichelson@chevron.com

October 23, 2019

New Mexico Oil Conservation Division, District 1 1625 N. French Drive Hobbs, NM 88240

Re: Vacuum Glorieta West Unit O-40 Trunk Line Remedial Plan #: 1RP-3259 and 1RP-3252

2019 Work Plan Lea County, New Mexico

Dear whom it concerns,

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

Vacuum Glorieta West Unit O-40 Trunk Line 2019 Work Plan

The submittal was prepared by Arcadis U.S., Inc. (Arcadis) on behalf of Chevron Environmental Management Company (CEMC).

Please do not hesitate to call Scott Foord with Arcadis at 713-953-4853 or myself at 832-854-5601, should you have any questions.

Sincerely,

Jason Michelson

Encl. Vacuum Glorieta West Unit O-40 Trunk Line 2019 Work Plan

C.C. Amy Barnhill, Chevron/MCBU



New Mexico Oil Conservation Division – District I Upstream Business Unit 1625 N. French Drive Hobbs, New Mexico 88240

Subject:

Remediation Work Plan
2019 Remediation Activities
HES Transfer Site – Vacuum Glorieta West Unit O-40 Trunk Line
1RP-3259 and 1RP-3252

Dear New Mexico Oil Conservation Division:

PROJECT SUMMARY

Lea County, New Mexico

According to the submitted New Mexico Oil Conservation Division (NMOCD) Notification of Release and Correction Action (Form C141), a release of approximately 149 barrels (bbls) of produced water occurred at the site (primarily pastureland) on December 5, 2012 due to a leak from an underground fiberglass line. Chevron personnel from the Mid-Continent Business Unit (MCBU) stopped the release and recovered approximately 35 bbls of fluids using a vacuum truck. On December 5, 2012, Chevron MCBU personnel excavated visually impacted soil in the area to a depth of approximately 2 feet below ground surface (bgs).

Chevron collected six discrete confirmation soil samples from the base of the excavation on January 22, 2013 that showed chloride was in excess of the historical New Mexico Administrative Code Closure Criteria (NMAC CC) of 500 milligrams per kilogram (mg/kg) confirming continued soil assessment efforts were necessary to fully delineate the impacted area.

Soil and Groundwater Investigations

In October 2013, Arcadis advanced nine soil borings to a depth of 30 feet bgs in an effort to delineate the vertical and horizontal impacts to the soil. Six soil samples were collected from each boring. Chloride was detected in 23 of the 26 soil samples above the 2009 NMAC CC of 500 mg/kg in 5 of the 26 soil samples.

Arcadis U.S., Inc. 10205 Westheimer Road

Suite 800 Houston Texas 77042 Tel 713 953 4800 Fax 713 977 4620 www.arcadis.com

ENVIRONMENT

Date:

October 23, 2019

Contact:
Scott Foord

Phone:

713.953.4853

Email:

william.foord@arcadis.com

Our ref: N/A

ARCADIS U.S., Inc.

TX Engineering License # F-533 Geoscientist License # 50158 New Mexico Oil Conservation Division – District I October 23, 2019

In September 2016, Arcadis conducted subsequent site assessment activities to further delineate chloride-impacted soil at the site. Arcadis advanced 10 soil borings to depths of two-four feet bgs. A total of 26 soil samples were collected and submitted for chloride analysis. Chloride was detected above the 2009 NMAC CC of 500 mg/kg in 5 of the 26 soil samples.

The additional soil delineation sampling and chloride field screening activities conducted in 2016 suggested potential impacts to groundwater at VGWU O-40. Arcadis installed a groundwater monitoring well (VGWUO40-MW1) to a total depth of 150 feet bgs on December 4, 2017 to evaluate to groundwater conditions at the Site. Chloride was detected at a concentration of 470 milligrams per liter (mg/L) in VGWUO40-MW1 during the December 2017 sampling, 556 mg/L in July 2018, and 630 mg/L in October 2018. Detected chloride concentrations during each groundwater sampling event exceeded the New Mexico Quality Control Commission (NMWQCC) groundwater standard set forth in NMAC Section 20.6.2.3103B of 250 mg/L.

On October 25, 2018, Arcadis performed an electromagnetic conductivity (EM) survey over accessible areas of the site covering approximately 4 acres. Elevated electrical conductivity responses across the area of the release where detected.

In conjunction with the geophysical survey, and for correlation purposes as well as to provide site specific laboratory data, Arcadis collected 5 surface soil samples using a hand auger from a depth of 0.5 feet bgs. Chloride was detected in 3 of the 5 surface soil samples collected. Chloride concentrations detected in two of the surface soil samples exceeded the revised 2018 NMAC CC of 600 mg/kg for soil within the first 4 feet bgs.

Historical analytical results for soil and groundwater can be found in Table 1 and Table 2, respectfully.

SCOPE OF WORK

Task 1 - Utility Locate

Prior to initiating any intrusive work, the presence of subsurface and overhead utilities will be investigated in accordance with Arcadis Utility Location and Clearance Standard (Health and Safety Standard No. ARCHSFS019) and CEMC Ground Disturbance Standard and supplemental Subsurface Line Strike Prevention Guidance, requiring a minimum of three lines of evidence including the following:

- Notify New Mexico 811 a minimum of 48 hours in advance of commencing intrusive activities at the Site. The notification will allow its member utilities to review proposed sample locations at the Site and identify potential subsurface utility conflicts.
- Contract a licensed private utility locating service to complete a geophysical survey of the proposed boring locations at the Site. The private utility locating service will utilize ground penetrating radar and electromagnetic equipment, among other utility locating techniques, to identify any subsurface utilities near proposed boring locations. Located utilities will be surveyed using Trimble GeoExplorer 6000 series global positioning system equipment, or equivalent.
- Arcadis will prepare and submit a dig plan to the Chevron MCBU Functional Operations Team for approval.

New Mexico Oil Conservation Division – District I October 23, 2019

 Attempt to clear all boring and monitoring well locations utilizing air knifing equipment to at least 5 feet bgs if soil/site conditions allow. In the event clearance is not feasible, the subcontractor will follow variance requirements.

Task 2 - Monitoring Well Installation

Further investigation activities will be conducted at the site inclusive of the installation of two additional monitoring wells. Arcadis will acquire well installation permits from New Mexico State of Engineers before commencing fieldwork. Arcadis will coordinate the utility clearance activities (e.g. New Mexico State One Call, private locating service, and Dig Plan process). The New Mexico Licensed drilling company will complete the following tasks with oversight provided by Arcadis field personnel:

- Clear all locations utilizing air knifing equipment to at least 5 feet bgs. In the event clearance to 5 feet bgs is not feasible, Arcadis will follow CEMC's variance process.
- Two monitoring wells will be installed into the groundwater bearing unit. Arcadis anticipates that both monitoring wells will be advanced to approximately 150 feet bgs based on previous groundwater investigations in the vicinity, although the total depth will be determined by field observations under the supervision of a field geologist. The monitoring wells will be constructed with four-inch diameter schedule 80 poly vinyl chloride (PVC) casing and 0.010-inch machine-slotted PVC screen. The well will have four feet of stick up casing above ground surface and will be properly secured with a locking monitoring well cap. The well will be purged and developed 24 hours after installation.
- The two monitoring well borings will be logged on Arcadis boring logs according to USGS guidelines.
 Arcadis will collect soil samples during the well installation process at ten-foot intervals for laboratory
 analysis of chloride by EPA Method 300. Chloride field testing will also be conducted at ten-foot
 intervals to help guide soil sample analyses.
- Investigative derived waste (IDW), which includes soil cuttings from drilling and purge water from well
 development, will be drummed in 55-gallon drums, properly labeled, and stored onsite. The drums will
 be sampled to determine disposal classification. Arcadis will arrange for a licensed disposal company
 to transfer the drums to an approved disposal facility.
- All samples will be collected in clean, laboratory-supplied sample containers, labeled, placed on ice, cooled to approximately 4 degrees Celsius, and transported to a State of New Mexico-certified laboratory, under chain-of-custody protocol.
- Monitoring wells will also be surveyed by a State of New Mexico surveyor.

Task 3 – Semi-annual Groundwater Sampling

Two rounds of groundwater sampling from the monitoring wells will be conducted to determine current chloride concentrations in groundwater. Groundwater samples will be analyzed for chloride by USEPA Method 300.1 (or an equivalent method) with a standard (10-day) turnaround time. The groundwater samples will be collected in clean, laboratory-supplied sample containers, labeled, placed on ice, cooled to approximately 4 degrees Celsius, and transported to a State of New Mexico-certified laboratory, under chain-of-custody protocol.

New Mexico Oil Conservation Division – District I October 23, 2019

Task 4 - Data Evaluation and Reporting

The results of the well installation and semi-annual sampling activities will be summarized in an annual report for submittal to the NMOCD. The report will include tabulated gauging and analytical data, figures showing locations and results, and laboratory analytical data sheets. Recommendations for site closure and/or additional work to move the site towards closure will also be included. The report will be submitted prior to the end of the third quarter 2020.

If you have any questions or comments, please contact either Scott Foord by phone at 713 953 4853 or by e-mail at william.foord@arcadis.com or Greg Cutshall by phone at 859 327 4626 or by email at greg.cutshall@arcadis.com.

Sincerely,

Arcadis U.S., Inc.

Greg Cutshall Program Manager Scott Foord Project Manager

Copies:

File

Enclosures:

Tables

- 1 Historical Soil Analytical Results
- 2 Historical Groundwater Results

Figures

1 Proposed Monitoring Well Locations Map

Table 1
Soil Analytical Results
Chevron EMC
Vacuum Glorieta West Unit O-40 Trunk Line
Lea County, New Mexico



Boring Location ID	Sample Date	Sample Depth (feet bgs)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Total Xylenes (mg/kg)	Total BTEX (mg/kg)	TPH-GRO (mg/kg)	TPH-DRO (mg/kg)	Chloride (mg/kg)	% Moisture
	NMAC Closu	ure Criteria ^(a)	10				50	1,0	000	20,000	
VGWU #040 Sample #1	1/22/2013	2	<0.050	<0.050	<0.050	<0.150		<10.0	<10.0	11,000	
VGWU #040 Sample #2	1/22/2013	2	<0.050	<0.050	<0.050	<0.150		<10.0	<10.0	9,760	
VGWU #040 Sample #3	1/22/2013	2	< 0.050	< 0.050	<0.050	<0.150		<10.0	<10.0	11,600	
VGWU #040 Sample #4	1/22/2013	2	<0.050	<0.050	<0.050	<0.150		<10.0	<10.0	6,480	
VGWU #040 Sample #5	1/22/2013	2	< 0.050	< 0.050	<0.050	<0.150		<10.0	<10.0	9,920	
VGWU #040 Sample #6	1/22/2013	2	< 0.050	< 0.050	<0.050	<0.150		<10.0	<10.0	12.000	
,	10/23/2013	2								1,000	5
	10/23/2013	5						-	-	2,100	4
	10/23/2013	10						_		400	6
VGWU 40- 01	10/23/2013	15								350	5
	10/23/2013	20						_	_	33	8
	10/23/2013	25							_	15	4
	10/23/2013	30						-		180	3
											6
	10/22/2013	2						-	-	2,600	
	10/22/2013	5						-		4,300	10
	10/22/2013	10							-	4,700	3
VGWU 40- 02	10/22/2013	15						-	-	3,900	6
	10/22/2013	20	-	-				-	-	2,600	7
	10/23/2013	25						-	-	3,100	3
	10/23/2013	30	-					-	-	3,600	4
	6/23/2016	80						-		93	
	10/23/2013	2	-					-	-	3,600	5
	10/23/2013	5						-	-	910	3
	10/23/2013	10								37	3
VGWU 40- 03	10/23/2013	15						-	-	23	3
	10/23/2013	20						-	-	14	1
	10/23/2013	25								8	2
	10/23/2013	30						-	-	27	2
	10/22/2013	2						-	-	1,700	6
	10/22/2013	5								5,200	9
	10/22/2013	10						-	-	360	6
VGWU 40- 04	10/22/2013	15								93	8
VOVVO 40- 04	10/22/2013			ļ						23	6
		20								71	12
	10/22/2013	25						-			
	10/22/2013	30						-	-	21	8
	10/23/2013	2								54	1
VGWU 40- 05	10/23/2013	5	-					-		53	8
	10/23/2013	10							-	10	2
	10/23/2013	15							-	6	1
	10/23/2013	20						-	-	6	2
	10/23/2013	25						-	-	7	3
	10/23/2013	30							-	7	5
	10/23/2013	2						-	-	51	2
VGWU 40- 06	10/23/2013	5						-	-	27	6
	10/23/2013	10						-	-	7	4
	10/23/2013	15	-				-	-	-	<4.4	9
	10/23/2013	20						-	-	6	4
	10/23/2013	25								7	4
	10/23/2013	30						-	-	10	4
	10/23/2013	2						-	-	2,400	4
	10/23/2013	5						_	-	130	2
	10/23/2013	10							-	33	3
VGWU 40- 07	10/23/2013	15						_	_	96	5
	10/23/2013	20						-	-	14	3
											4
	10/23/2013	25								8	4

Table 1 **Soil Analytical Results** Chevron EMC Vacuum Glorieta West Unit O-40 Trunk Line Lea County, New Mexico



Boring Location ID	Sample Date	Sample Depth (feet bgs)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Total Xylenes (mg/kg)	Total BTEX (mg/kg)	TPH-GRO (mg/kg)	TPH-DRO (mg/kg)	Chloride (mg/kg)	% Moisture
	NMAC Clos	ure Criteria ^(a)	10				50	1,0	000	20,000	
	10/23/2013	2								2,000	3
	10/23/2013	5						-		700	6
	10/23/2013	10						-		2,600	8
VGWU 40- 08	10/23/2013	15								11	13
	10/23/2013	20						-		46	5
	10/23/2013	25						-		130	4
	10/23/2013	30						-		61	7
	10/23/2013	2								2,500	5
	10/23/2013	5						-		1,800	2
	10/23/2013	10						-		900	4
VGWU 40- 09	10/23/2013	15					-	-		2,300	10
	10/23/2013	20					-	-		580	9
	10/23/2013	25								70	7
	10/23/2013	30								130	5
	9/12/2016	2								1,980	
	9/12/2016	4								428	
VGWUO40-10	9/12/2016	7								259	
	9/12/2016	70						-		920	
	9/12/2016	2								44.2	
VGWUO40-11	9/12/2016	4						-		<10.0	
	9/13/2016	2						-		87	
VGWUO40-12	9/13/2016	4						-		54	
	9/12/2016	2						-		753	
VGWUO40-13	9/12/2016	4								714	
	9/12/2016	10								10.1	
	9/12/2016	2								87	
VGWUO40-14	9/12/2016	4								101	
	9/12/2016	2						-		<10.0	
VGWUO40-15	9/12/2016	4								<10.0	
	9/13/2016	2								329.00	
VGWUO40-16	9/13/2016	4						_		881.00	
	9/13/2016	50								16.40	
	9/13/2016	2								52.8	
VGWUO40-17	9/13/2016	4								34.8	
	9/13/2016	2								65.30	
VGWUO40-18	9/13/2016	4								318.00	
	9/13/2016	70								142.00	
	9/13/2016	2								54.2	
VGWUO40-19	9/13/2016	4								59.6	
VGWUO40-20	10/25/2018	0.5								<4.95	
VGWUO40-21	10/25/2018	0.5								938.0	
VGWUO40-21	10/25/2018	0.5						-		27.5	
VGWUO40-22	10/25/2018	0.5								972	
VGWUO40-24	10/25/2018									<5.01	
v G v v U U 4 U - 2 4	10/25/2018	0.5			I					~ 5.01	

Legend:

Percent
Miligram(s) per kilogram
Analyte was not detected above the specified method reporting limit mg/kg < Not Analyzed/Not Listed

Below ground surface

Benzene, toluene, ethylbenzene, and total xylenes New Mexico Administrative Code

bgs BTEX NMAC TPH-GRO TPH-DRO Total Petroleum Hydrocarbons as Gasoline Range Organics
Total Petroleum Hydrocarbons as Diesel Range Organics

Notes:
(a) Title 19, Chapter 15 of the NMAC for Natural Resources and Wildlife, Oil and Gas, and Releases, 19.15.29 NMAC. August.

UPDATED HES Transfer sites_results 2018 11 08

Table 2
Groundwater Gauging Data and Analytical Results
Chevron EMC
Vacuum Glorieta West Unit O-40 Trunk Line
Lea County, New Mexico



Monitoring Well ID	Date NMAC Standards ²	DTW (ft btoc)	Chloride ¹ (mg/L)	
	250			
	12/7/2017	149.3	470	
	12/7/2017 (DUP)	-	459	
VGWUO40-MW1	7/31/2018	134.8	556	
VGVV0040-WW	7/31/2018 (DUP)	-	526	
	10/25/2018	135.0	630	
	10/25/2018 (DUP)		628	

Notes:

- 1. Chloride analyzed by EPA Method 300/300.1.
- 2. Title 20, Chapter 6 of the NMAC for Environmental Protection, Water Quality, Ground and Surface Water Protection, 20.6.2 NMAC. December.

Legend:

###	Analytical value is greater than or equal to NMAC closure criteria
	Not applicable or not measured
NMAC	New Mexico Administrative Code
DUP	Field duplicate sample
DTW	Depth to Water
mg/L	Miligram(s) per liter
BTOC	Below top of casing
ft	Feet



Monitor wells approved for completion, should attemt to define background value for Cl in GW. Proceed with development and submittal of excavation plan for soils. Can use one report for two incident numbers but must be SUBMITTED to portal for BOTH incdet numbers

Table 2 GW Data Page 1 of 1

District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720

District II 811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

District III 1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. **Santa Fe, NM 87505**

CONDITIONS

Action 2076

CONDITIONS

Operator:	OGRID:
Arcadis U.S., Inc	329073
630 Plaza Drive	Action Number:
Highlands Ranch, CO 80129	2076
	Action Type:
	[C-141] Release Corrective Action (C-141)

CONDITIONS

Created	Condition	Condition
Ву		Date
bbillings	Monitor wells approved for completion, should attempt to define background value for CI in GW. Proceed with development and submittal of excavation plan for soils. Can use one report for	7/8/2021
	two incident numbers but must be SUBMITTED to portal for BOTH incident numbers	