

ATTACHMENT 1

MISC.

CORRESPONDENCE

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENTOIL CONSERVATION DIVISION
DISTRICT I HOBBS
1625 N. French Dr., Hobbs, NM 88240
(505) 393-6161
FAX (505) 393-0720Jennifer A. Salisbury
CABINET SECRETARY

June 30, 1999

Mr. Rick Massey
Chevron USA
P.O. Box 1949
Eunice, NM 88231

RECEIVED

JUL 09 1999

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

Re: Mark Battery #1 & #2: UL G, Sec 3, Ts22S, R37E

Dear Mr. Massey:

New Mexico Oil Conservation Division (NMOCD) is in receipt of Chevron USA's (CUSA) Work Plan dated June 17, 1999 for the above referenced site submitted by Safety & Environmental Solutions, Inc. **The plan is hereby approved and subject to the following conditions:**

1. CUSA will notify the NMOCD at least 48 hours in advance of the scheduled activities such that the NMOCD has the opportunity to witness the events and split samples.
2. CUSA will provide the NMOCD with information on the vertical extent of the contamination in the vicinity of test locations 1-4. This information will be submitted along with the bottom hole and side wall sample analysis.
3. CUSA will provide the NMOCD with analysis of samples to be taken of the remediated soil located at the King Battery Site that will be used for backfill; Prior to using the remediated soil for backfill.
4. CUSA will provide the NMOCD with a final report containing the results of the remedial actions. The report will be submitted to the NMOCD Hobbs District Office by September 1, 1999.

Please be advised that NMOCD approval of this plan does not relieve CUSA of liability should their operations fail to adequately investigate and remediate contamination that poses a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve CUSA of responsibility for compliance with any other federal, state, or local laws and/or regulations. If you require any further information or assistance please do not hesitate to call (505) 393-6161 ext...113 or write this office.

Sincerely Yours,

Donna Williams-Environmental Engineer

Cc: Chris Williams-NMOCD District I Supervisor
Bill Olson-Environmental Bureau, Santa Fe, NM

Work Plan Mark Battery #1 & #2 Site Chevron USA

Purpose

The purpose of this work plan is to cause the cleanup of the spill at the tank battery site located in Unit G of Section 3, Township 22S, Range 37E, Lea County, New Mexico. This plan will allow remediation in a manner that will protect the population, environment and groundwater of the area surrounding the subject location.

Background

On June 16, 1999, Chevron USA secured the services of Safety and Environmental Solutions, Inc. to complete all necessary sampling and testing of the spill at the area known as the Mark Battery #1 & #2 site. According to the State of New Mexico water well database, the groundwater to the east and south varies from 33' – 58' and to the north and west varies from 92' to 108'.

Four (4) test holes were completed at the spill site and the adjacent lease road. The analytical results have been previously reported to the New Mexico Oil Conservation Division in the report dated June 17, 1999, ***Chevron USA Site Assessment, Mark Battery #1 & #2 Site***. The results of this assessment revealed the vertical extent of contaminated soils from 10" to 2.5' at various locations on the subject site with an underlying rock layer encountered at all locations.

An area north of the existing tank battery had been previously excavated to a depth of 12" with the contaminated soils moved offsite.

Knowledge of process indicates that the material in this area would be exempt oil field waste.

Method

Chevron USA has determined the most appropriate course of action is to excavate the affected soils along the tank battery and adjacent lease road to the underlying rock layer. Additional testing (TPH and BTEX) will be performed on the bottom and sides of the spill area excavation in order to determine that the NMOCD approved limit of 1,000ppm for TPH has been achieved.

The caliche that has been broken in the roadway will be pushed to the side. The roadbed area will be drilled and tested to determine the vertical extent of contamination. The caliche will then be returned to the roadbed. The excavated contaminated soils that were removed to the King Battery site will be blended with soils onsite at the King site to achieve the approved TPH levels and then returned to the Mark Battery to be used as backfill material. The roadway and spill run areas will be backfilled and restored to original grade.

The excavated area north of the tank battery will be blended onsite and testing will be performed to confirm acceptable TPH levels. The excavation will be back filled with the blended soil and restored back to the original grade.

ATTACHMENT 2

Chevron USA

**Mark #1 & #2
Tank Battery Closure Report
Lea County, New Mexico**

July 19, 1999

*Safety & Environmental Solutions, Inc.
703 E. Clinton Suite 103
Hobbs, New Mexico 88240
(505) 397-0510*

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Mark #1 & #2 Closure Report
July 19, 1999

Chevron USA

I. Physical Description

The legal description of the leak site is in Unit G of Section 3, Township 22S, Range 37E, Lea County, New Mexico (Figure 1).

II. Background

The site consists of a four (4) tank battery station with an adjacent lease road. This area is used for the storage and transfer for transportation of fluids produced by wells of the Mattern lease by Chevron USA. A spill and subsequent runoff area into the lease road was investigated. There was visual evidence of prior leaks observed on the surface.

III. Contaminant and Size of Leak

The leak at the tank battery resulted in crude oil being discharged approximately 12" to 18" underground, pooling to the north of the tank battery and then streaming to the west along the load line a pipeline right of way for approximately 400' with widths varying from 1' to 2'. (Site Plan)

IV. Vertical and Horizontal Extent of Contamination

On June 16, 1999, SESI drilled four (4) test borings at the spill site. The purpose of the borings was to determine the vertical extent of the contamination. Each boring was drilled to a depth of 10" to 2.5' with the samples taken from undisturbed soil with a split spoon sampler. The samples were field tested for TPH with a General Analysis Corporation Mega-TPH Total Petroleum Hydrocarbon Analyzer using EPA Method 418.1.

A summary of each test hole is presented in the following table with third party analyticals in italics and field analysis in bold text:

ID/ Depth	TPH	Benzene	Toluene	Ethyl Benzene	Xylenes
1 – 10"	<i><197ppm</i>	<i><.002ppm</i>	<i><.002ppm</i>	<i>.003ppm</i>	<i>.009ppm</i>
2 – 12"	286ppm				
3 - 2.5'	<i>3205ppm</i>	<i>.010ppm</i>	<i>.14ppm</i>	<i>.041ppm</i>	<i>1.07ppm</i>
4 – 2'	<i>1318ppm</i>	<i>.007ppm</i>	<i>.041ppm</i>	<i>.024ppm</i>	<i>1.14ppm</i>

Impenetrable rock was encountered at the bottom depth of each test hole.

V. Surface Water and Waterways

The distance to the nearest surface water is in excess of 1 mile.

Mark #1 & #2 Closure Report
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VI. Groundwater

The nearest water well on record with the New Mexico State Engineer and the United States Geological Survey in Albuquerque are in excess of 1 mile away. According to the State of New Mexico water well database, the groundwater to the east and south varies from 33' – 58' and to the north and west varies from 92' to 108'.

VII. Soil Information

The soils of the area are of the Berino-Cacique association. These soils are nearly level and gently sloping, sandy soils that are deep to moderately deep to soft to indurated caliche.

VIII. Work Performed

Blending of the excavated contaminated soils from the Mark Battery was begun on July 12, 1999 with fresh soils at the King Battery. A composite sample was taken of the final blend on July 13th and taken to a third party laboratory for analysis for Total Petroleum Hydrocarbons (TPH - EPA Method 8015). Soil sampling was performed on soils from each test hole using SOPs found in **Environmental Protection Agency, 1984, Characterization of Hazardous Waste Site - A Methods Manual: Vol II**. Field tests were run on composite samples for TPH during blending onsite. (See Analytical Results) The test results from Cardinal Laboratories are as follows:

<u>Site</u>	<u>TPH</u>
Blend	<100ppm

Upon the confirmation of the TPH level of the blended material, the soils were returned to the Mark Battery where they were further blended into the excavated areas onsite. Composite samples were taken of the bottom area in the roadway and the load line area of the Mark battery site. The results from Cardinal laboratories are as follows:

<u>Site</u>	<u>TPH</u>
Roadway Bottom	167ppm
Load line Bottom	331ppm

On July 14, 1999, final surface composites were taken of the roadway and load line areas. With the results from Cardinal Laboratories as follows:

<u>Site</u>	<u>TPH</u>	<u>Benzene</u>	<u>Toluene</u>	<u>E. Benzene</u>	<u>T.Xylenes</u>
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July 19, 1999

Chevron USA

Roadway Final	633ppm	<.002ppm	<.002ppm	<.002ppm
<.006ppm				

Load line Final	596ppm	<.002ppm	<.002ppm	<.002ppm	<.006ppm
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The area inside the fence north of the tank battery that had been previously excavated was blended with clean soils obtained from the King Battery to achieve the target regulatory levels of 1000ppm obtained from Donna Williams of the NMOCD. Extensive historical contamination was observed. A final surface composite of the area inside the fence was taken on July 16, 1999 and the results from Cardinal Laboratories is as follows:

<u>Site</u>	<u>TPH</u>	<u>Benzene</u>	<u>Toluene</u>	<u>E. Benzene</u>	<u>T.Xylenes</u>
North Area Final	420ppm	<.002ppm	<.002ppm	<.002ppm	<.006ppm

VIII. Figures and Appendices

Figures:

Vicinity Map
 Site Plan
 Photo Exhibits

Appendices:

Laboratory Analytical Results

***Mark #1 & #2 Closure Report
July 19, 1999***

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Figure 1 Vicinity Map

Chevron USA
Production

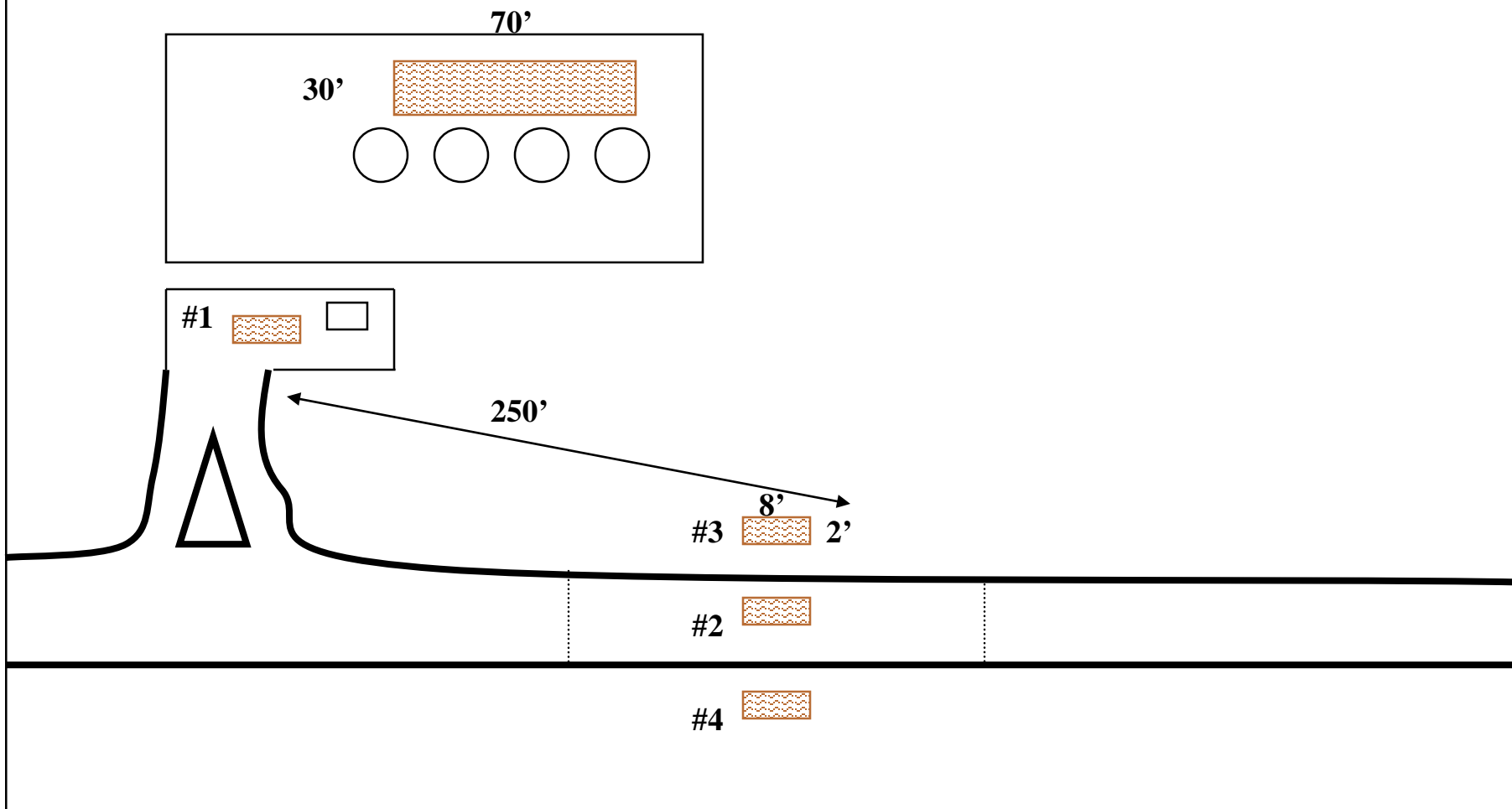
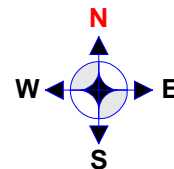
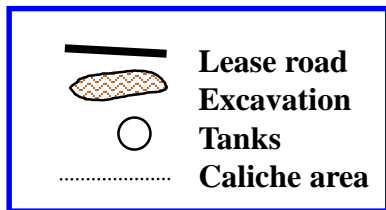
**Mark Tank Battery #1 & #2
Leak Site
Vicinity Map**

Safety & Environmental
Solutions, Inc.
Hobbs, NM

***Mark #1 & #2 Closure Report
July 19, 1999***

Chevron USA

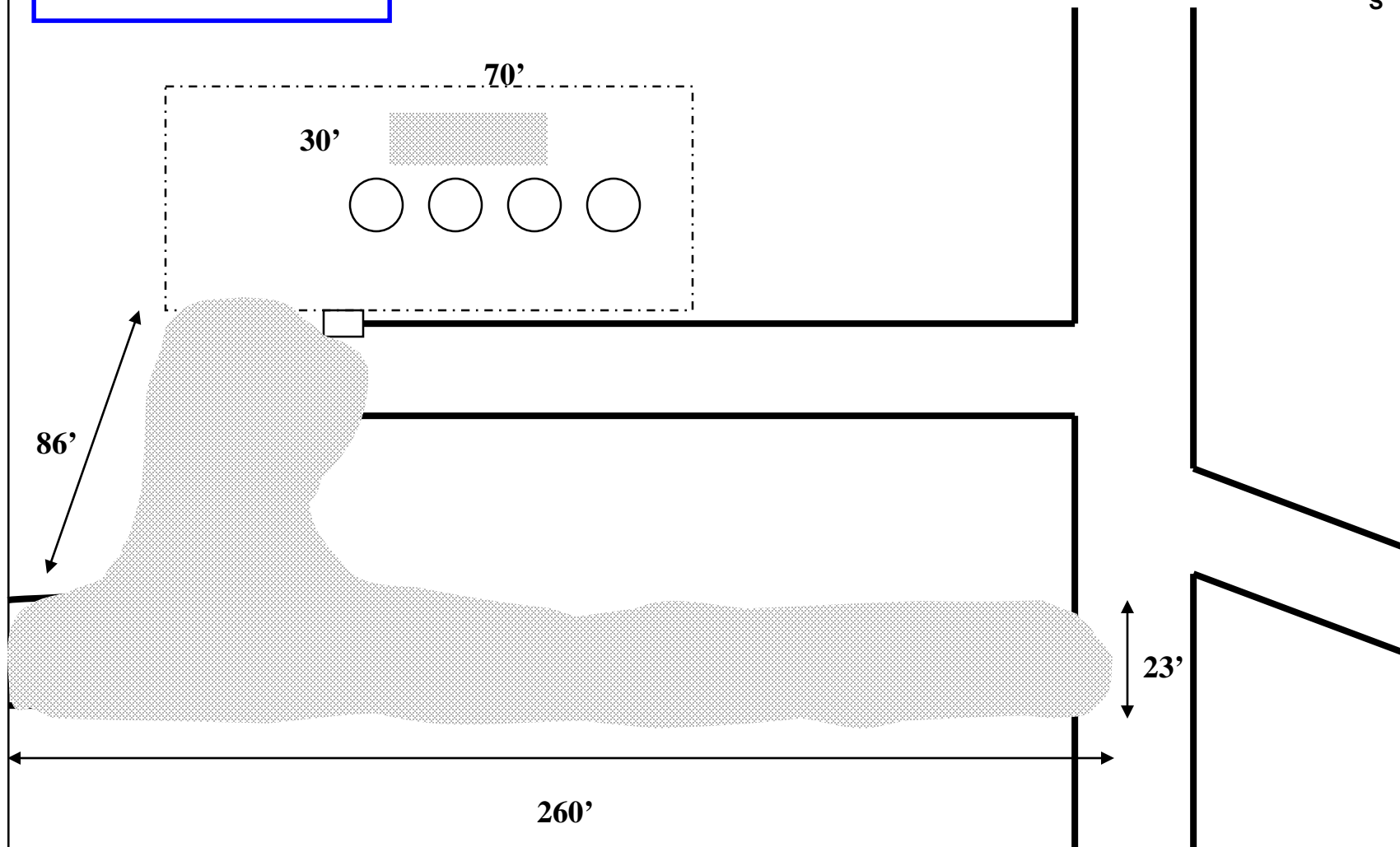
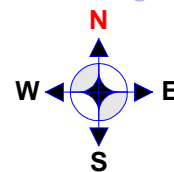
Figure 2 Site Plan



Chevron USA
Production

Mark Battery #1 & #2 Leak Site Plan

Safety & Environmental Solutions, Inc.
Hobbs, New Mexico



*Chevron USA
Production*

Mark Battery #1 & #2 Final Site Plan

Safety & Environmental Solutions, Inc.
Hobbs, New Mexico

***Mark #1 & #2 Closure Report
July 19, 1999***

Chevron USA

Figure 3 Photo Exhibits

Mark Battery #1 & #2 Site - Before Excavation

Mark Battery #1 & #2 Site - Before Excavation

Mark Battery #1& #2 Site - During Excavation

Mark Battery #1 & #2 Site - During Excavation

Mark Battery #1 & #2 Site - During Excavation

King Battery Site - After Excavation & Blending

Mark Battery #1 & #2 - Final Surface

Mark Battery #1 & #2 - Final Surface

***Mark #1 & #2 Closure Report
July 19, 1999***

Chevron USA

Appendix A Laboratory Analyticals

ATTACHMENT 3

Incident ID	
District RP	1RP-57
Facility ID	
Application ID	

Closure


The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

Closure Report Attachment Checklist: *Each of the following items must be included in the closure report.*

- ☒ A scaled site and sampling diagram as described in 19.15.29.11 NMAC *Provided within the Tank Battery Closure Report, Dated July 19, 1999*
- ☒ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection) *Photographic documentation was provided within the original Tank Battery Closure Report submittal to the OCD, Dated July 19, 1999; however, no photographic documentation is available to include with this duplicate copy of the report.*
- ☒ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☒ Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Adriane Gifford Title: Environmental Project Manager

Signature:  Date: 05/15/2020

email: agifford@chevron.com Telephone: 832-854-5620

OCD Only

Received by: _____ Date: _____

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____

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

District IV

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 8324

CONDITIONS

Operator: CHEVRON U S A INC 6301 Deauville Blvd Midland, TX 79706	OGRID: 4323
	Action Number: 8324
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
jnobui	None	1/19/2022