

Rec / ED

March 11, 2008

VIA: CERTIFIED MAIL

Mr. Larry Johnson Environmental Engineer New Mexico Oil Conservation Division – District I 1625 North French Drive Hobbs, New Mexico 88240

MAR 7 7 2008

1RP-1160 Final Remediation Report Chevron North America Exploration and Production Company, Inc. NW Eumont Unit Well #104, Unit C (NE/4, NW/4) Section 14, Township 19 South, Range 36 East Lea County, New Mexico

Dear Larry:

RE:

This report is submitted to the New Mexico Oil Conservation Division (OCD) on behalf of Chevron North America Exploration & Production Company (Chevron) by Larson & Associates, Inc. (LAI), its consultant, to present remediation results for a crude oil and produced water spill that occurred at the NW Eumont Unit Well #104 (Site) located in unit C (NE/4, NW/4), Section 14, Township 19 South, Range 36 East, in Lea County, New Mexico. The Site's latitude and longitude is 32° 39' 57.6" north and 103° 19' 37.4" west, respectively. Figure 1 presents a location and topographic map. Contact information for Chevron is as follows:

Name:	Rodney Bailey
Address:	15 Smith Road
	Midland, Texas 79705
Telephone:	(432) 687-7123
Cell:	(432) 894-3519
Email:	bailerg@chevron.com

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MAR 1 1 2008 HOBBS OCD

Chronology

On December 16, 2006, Rhombus Operating Co., Ltd. (Rhombus) reported the spill to the OCD and submitted an initial C-141. Rhombus' initial action included scraping about twenty-five (25) cubic yards of soil from the affected area, which was piled on the location. On December 20, 2006, the OCD issued a notice to Rhombus requiring it to delineate the vertical and horizontal extent of the spill due to shallow groundwater. On March 2, 2007, LAI conducted an investigation that included collecting soil samples to about 20 feet below ground surface (bgs) and analyzing the samples for benzene, toluene, ethylbenzene and xylene (BTEX), total petroleum hydrocarbons (TPH) and chloride. The extent of BTEX, TPH and chloride was determined from the investigation.

On January 3, 2008, the New Mexico State Land Office (SLO) contacted Chevron, as lessee of record, requested it to enforce corrective action within sixty (60) days. On January 17, 2007, the OCE approved a remediation plan that proposed excavation of soil to remediate the TPH below the recommended remediation action level (RRAL) of 100 milligrams per kilogram (mg/Kg) and reduce the chloride concentration.

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Setting

The predominant soil is the Kimbrough-Lea complex consisting of a gravelly to silt loam surface layer about 6 inches thick, which is underlain by caliche. No intermittent streams, lake or rivers are located within 1,000 horizontal feet of the Site, but the U.S.G.S. 7.5-minute series topographic map shows a depression about 200 feet west of the Site that may hold water during wet periods. No water wells are located within 1,000 horizontal feet of the Site. Data from the New Mexico State Engineer indicates that groundwater occurs in the Tertiary-age Ogallala formation at approximately 30 feet bgs.

Remediation Action Levels

The OCD has developed guidelines for remediation of crude oil spills ("Guidelines for Remediation of Leaks, Spills and Releases, August 13, 1993") that contains RRAL for benzene, BTEX and TPH based on the following criteria:

	Result	Ranking Score
Ranking Criteria		
Depth to Groundwater	<50 feet	20
Wellhead Protection Area	No	0
Distance to Surface Water Body	200-1000 Horizontal	10
	Feet	
	Total Score:	30

The following RRAL are assigned to Site based on the total ranking score (30):

Benzene:	10 mg/Kg
BTEX:	50 mg/Kg
TPH:	100 mg/Kg

On March 2, 2007, the release was delineated by collecting split-spoon and jam tube samples to approximately 20 feet bgs at 6 locations (SB-1 through SB-6) using an air rotary rig. These samples were submitted under chain-of-custody control to an environmental laboratory, which analyzed the samples for BTEX, TPH and chloride. No benzene or BTEX was reported in the samples above the RRAL, but TPH exceeded the RRAL (100 mg/Kg) in the following samples:

Location	Sample (Feet BGS)	TPH (mg/Kg)
SB-1	0-1	812
SB-2	0-1	3,482
SB-4	0-1	198.4
SB-5	0-1	9,940
SB-6	0 - 1	5,095

Chloride was delineated to the New Mexico Water Quality Control Commission (WQCC) domestic water quality standard for chloride, and decreased below 250 milligrams per kilogram (mg/Kg) in all samples collected at approximately 5 feet bgs, except BH6, where chloride was below 250 mg/Kg in the sample from approximately 15 feet bgs.

Remediation

Remediation commenced on February 11, 2008 and ended on March 4, 2008. An area measuring

Mr. Larry Johnson March 10, 2008 Page 2

approximately 35,000 square feet or 0.8 acres was excavated from about 2 to 12 feet bgs. Approximately 5,530 cubic yards of soil was hauled to Lea Land Landfill located at mile marker #64 on U.S. Highway 62/180 between Hobbs and Carlsbad, New Mexico.

On February 14, 2008, February 18, 2008, February 20, 2008, February 27, 2008 and March 08, 2008, LAI personnel collected soil samples from the bottom and sides of the excavation. These samples were submitted under chain of custody control to Environmental Lab of Texas, Inc. (ELTI) located in Odessa, Texas, and were analyzed for TPH, including gasoline range organics (GRO) and diesel range organics (DRO) and chloride using EPA methods SW-846-8015 and 300, respectively. Table 1 presents a summary of the laboratory analysis. Figure 2 presents a site drawing showing the approximate limits of the spill, excavation and soil sample locations. Appendix A presents the laboratory reports. Appendix B presents photographs.

Referring to Table 1, the TPH concentration in the bottom (BS) samples and side (SS) samples was below 100 mg/Kg. The chloride concentration in the in-situ soil was reduced below 1,000 mg/Kg based on the soil sample analysis. Chevron requests approval to fill the excavation with clean soil and seed the area according to New Mexico Land Office requirements. Appendix C presents the initial and final C-141. You may contact Mr. Rodney Bailey with Chevron (432) 687-7123 or email <u>bailerg@chevron.com</u>. I may be reached with questions at (432) 687-0901 email mar@laenvironmental.com.

Sincerely, Larson & Associates, Inc.

Mark J. Larson, P.G., C.P.G., C.G.W.P. Sr. Project Manager / President

Encl.

cc: Rodney Bailey - Chevron Jami Bailey - NMSLO Thaddeus Kostrubala - NMSLO Tables

Table 1

1RP-1160

Summary of Laboratory Analysis of Excavation Soil Samples

Chevron North America E & P Company, Inc., NW Eumont Unit Well #104

Unit C, Section 14, Township 19 South, Range 36 East

a.

Lea County, New Mexico

Sample	Depth	Position	Location	Sample Date	DRO	GRO	ТРН	Chloride
Identification	(Feet)			-	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)
						_		
NMOCD Recom	nmended Reme	diation Action	Levei:				100	
BS-1	1	In-Situ	Bottom/South/Center	2/14/2008	<18.8	<18.8	<18.8	269
BS-2	2	Excavated	Bottom/South/Center	2/14/2008	<16.8	<16.8	<16.8	1,300
	3	In-Situ	Bottom/South/Center	3/3/2008				90.4
BS-3	3	In-Situ	Bottom/South/Center	2/14/2008	<16.1	<16.1	<16.1	113
BS-4	3	Excavated	Bottom/South/West	2/14/2008	<15.6	<15.6	<15.6	1,020
	4	In-Situ	Bottom/South/West	3/3/2008	-			615
BS-5	3	In-Situ	Bottom/South/East	2/14/2008	<15.4	<15.4	<15.4	210
BS-6	3	In-Situ	Bottom/Center/West	2/14/2008	<15.9	<15.9	<15.9	475
BS-7	3	In-Situ	Bottom/Center/East	2/14/2008	<15.9	<15.9	<15.9	487
BS-8	1	Excavated	Bottom/South/West	2/14/2008	<15.4	<15.4	<15.4	1,080
	2	In-Situ	Bottom/South/West	3/3/2008				332
BS-9	1	In-Situ	Bottom/South/West	2/14/2008	<15.5	<15.5	<15.5	497
BS-10	1	Excavated	Bottom/Center/West	2/14/2008	<17.2	<17.2	<17.2	1,650
	2	In-Situ	Bottom/Center/West	3/3/2008				32.7
BS-11	1	Excavated	Bottom/Center/West	2/14/2008	<16.6	<16.6	<16.6	1,160
	2	In-Situ	Bottom/Center/West	3/3/2008				783
BS-12	3	In-Situ	Bottom/Center/West	2/20/2008	<15.9	<15.9	<15.9	425
BS-13	12	In-Situ	Bottom at Leak	2/20/2008	<16.3	<16.3	<16.3	493
BS-14	10	In-Situ	Bottom at Leak	2/20/2008	<17.0	<17.0	<17.0	<5.66
BS-15	1	In-Situ	Bottom/Center/North	2/20/2008	<15.8	<15.8	<15.8	9.08
BS-16	3	In-Situ	Bottom/North/East	2/20/2008	<16.4	<16.4	<16.4	64.1
BS-17	2	In-Situ	Bottom/North/East	2/20/2008	<16.1	<16.1	<16.1	17
BS-18	3	In-Situ	Bottom/Center/East	2/20/2008	<16.2	<16.2	<16.2	763
BS-19	2	In-Situ	Bottom/Center/East	2/20/2008	<15.8	<15.8	<15.8	4.93
*BS-20	1	Excavated	Bottom/Center/East	2/20/2008	<16.8	<16.8	<16.8	2,160
BS-21	3	In-Situ	Bottom/North/East	2/27/2008	<15.4	<15.4	<15.4	16.8
BS-22	3	In-Situ	Bottom/Center/East	2/27/2008	<15.5	<15.5	<15.5	96.2
BS-23	3	In-Situ	Bottom/Center/East	2/27/2008	<15.6	<15.6	<15.6	<5
BS-24	3	In-Situ	Bottom/Center/East	2/27/2008	<15.5	<15.5	<15.5	73.8
BS-25	3	In-Situ	Bottom/Center/East	3/3/2008	<15.6	<15.6	<15.6	465
\$\$-1	2	In-Situ	Side/South/East	2/18/2008	16.1	<15.4	16.1	207
SS-2	2	Excavated	Side/South/West	2/18/2008	16.7	<15.6	16.7	1,340
	3	In-Situ	Side/South/West	3/3/2008				199
SS-3	2	In-Situ	Side/South/East	2/18/2008	<15.4	<15.4	<15.4	379
SS-4	2	Excavated	Side/Center/West	2/18/2008	24.1	<16.3	24.1	1,130
	3	In-Situ	Side/Center/West	3/3/2008				626
SS-5	2	In-Situ	Side/Center/West	2/20/2008	<17.8	<17.8	<17.8	178
SS-6A	3	In-Situ	Side/Source/West	2/20/2008	<16.3	<16.3	<16.3	391
SS-6B	6	In-Situ	Side/Source/West	2/20/2008	<15.7	<15.7	<15.7	529
SS-6C	11	In-Situ	Side/Source/West	2/20/2008	<16.9	<16.9	<16.9	21.3
SS-7	9	In-Situ	Side/Source/North	2/20/2008	<16.3	<16.3	<16.3	24.4
SS-8	8	In-Situ	Side/Source/East	2/20/2008	<16.2	<16.2	<16.2	<5.40

Table 1

1RP-1160

Summary of Laboratory Analysis of Excavation Soil Samples

Chevron North America E & P Company, Inc., NW Eumont Unit Well #104

Unit C, Section 14, Township 19 South, Range 36 East

Lea County, New Mexico

Sample Identification	Depth (Feet)	Position	Location	Sample Date	DRO (mg/Kg)	GRO (mg/Kg)	TPH (mg/Kg)	Chloride (mg/Kg)
NMOCD Recon	nmended Rem	diation Action	Level:				100	
SS-9	S-9 3 In-Situ Sid		Side/North/East	2/20/2008	<15.7	<15.7	<15.7	37.8
SS-10	2	In-Situ	Side/North/East	2/20/2008	<15.6	<15.6	<15.6	16.7
SS-11	2	In-Situ	Side/North/East	2/20/2008	<16.0	<16.0	<16.0	582
SS-12	2	In-Situ	Side/North	2/27/2008	<15.2	<15.2	<15.2	12.8
SS-13	2	In-Situ	Side/North/East	2/27/2008 <15.5		<15.5	<15.5	29.2
SS-14	2	In-Situ	Side/East	2/27/2008	<15.4	<15.4	<15.4	2.91
SS-15	2	In-Situ	Side/East	3/3/2008	<15.8	<15.8	<15.8	136

Notes: Analysis performed by Environmental Lab of Texas, Odessa, Texas

All results reported in milligrams per Kilogram (mg/Kg)

1. -: Sample was not analyzed

2. <: Below method detection limit

3. *: Refer to Sample BS-24 following additional soil excavation

Figures





FIGURE 2B - EXCAVATION DRAWING

Appendix A

Laboratory Reports (CD ROM) Appendix B

Photographs



1. NW Eumont Unit Well #104 Spill Area Looking South, March 2, 2007.



2. NW Eumont Unit Well #104 Spill Area Looking East, March 2, 2007.



3. NW Eumont Unit Well #104 Spill Area Looking Southeast, March 2, 2007.



4. NW Eumont Unit Well #104 Spill Area Looking South, March 2, 2007.



5. NW Eumont Unit Well #104 Spill Area Looking South March 2, 2007.



6. NW Eumont Unit Well #104 Spill Excavation LookingNorthwest, Febuary 11, 2008.



7. NW Eumont Unit Well #104 Spill Excavation Looking Northwest, Febuary 11, 2008.



8. NW Eumont Unit Well #104 Spill Excavation Looking Northwest, Febuary 12, 2008.



9. NW Eumont Unit Well #104 Spill Excavation Looking Northwest, Febuary 14, 2008.



10. NW Eumont Unit Well #104 Spill Excavation Looking Northwest, Febuary 14, 2008.



11. NW Eumont Unit Well #104 Spill Excavation Looking East, Febuary 14, 2008.



12. NW Eumont Unit Well #104 Spill Excavation Looking Northwest, Febuary 19, 2008.



13. NW Eumont Unit Well #104 Spill Excavation Looking Northeast, Febuary 19, 2008.



14. NW Eumont Unit Well #104 Spill Excavation Looking South, Febuary 25, 2008.



15. NW Eumont Unit Well #104 Spill Excavation Looking Northeast, Febuary 25, 2008.



16. NW Eumont Unit Well #104 Spill Excavation Looking Southeast, March 3, 2008.



17. NW Eumont Unit Well #104 Spill Excavation Looking South, March 3, 2008.



18. NW Eumont Unit Well #104 Spill Excavation Looking East, March 3, 2008.



19. NW Eumont Unit Well #104 Spill Excavation Looking Southeast, March 3, 2008.



20. NW Eumont Unit Well #104 Spill Excavation Looking East, March 3, 2008.

Appendix C

Initial and Final C-141

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			2.4	NAT	TIDE		Г А СТ				
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Waa Immadi	ta Nation (Timen 9				Unknown 12/16/06 9:00 am					
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I hereby certi	fy that the i	information gi	ven above	is true and comp	lete to th	e best of my	knowledge and u	ndersta	nd that purs	uant to NMO	CD rul
regulations al	l operators	are required to	o report ar	d/or file certain r	elease no	tifications a	nd perform correc	tive act	ions for rele	eases which m	ay end
should their c	or the environment	ronment. The ave failed to a	acceptanc dequately	e of a C-141 repo investigate and re	ort by the emediate	: NMOCD m : contaminati	arked as "Final Re on that pose a thre	eport" d eat to g	loes not reli ound water	eve the operation of the surface water	or of li r. hum
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							— UIL CONS	SER V	ATION	DIVISIO	N

HOLE IN INJECTION LINE. DUG UP AND REPAIRED INJECTION	N LINE.	
Describe Area Affected and Cleanup Action Taken.* 20' X 30' AROUND WELLHEAD, RUNOFF 50 YARDS INTO CATT PLAN ON DIGGING OUT NEWLY CONTAMINATED DIRT, HAUL FRESH DIRT.	LING IT TO AN APPROVED DISPC	YET – WAITING ON STATE APPROVAL. DSAL SITE, AND REPLACING IT WITH
I hereby certify that the information given above is true and complete to regulations all operators are required to report and/or file certain release public health or the environment. The acceptance of a C-141 report by t should their operations have failed to adequately investigate and remedia or the environment. In addition, NMOCD acceptance of a C-141 report federal, state, or local laws and/or regulations.	the best of my knowledge and unders notifications and perform corrective a he NMOCD marked as "Final Report ate contamination that pose a threat to does not relieve the operator of respo	stand that pursuant to NMOCD rules and actions for releases which may endanger " does not relieve the operator of liability o ground water, surface water, human health insibility for compliance with any other
	OIL CONSER	VATION DIVISION
Signature:		
Printed Name:	Approved by District Supervisor:	
Title:	Approval Date:	Expiration Date:
E-mail Address:	Conditions of Approval:	Attached 🗌
Date: Phone:		
Attach Additional Sheets If Necessary		

J

Form C-141 Revised October 10, 2003

Final Report

Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

ttach Additional Sheets If Necessary

District I 1625 N French Dr , Hobbs, NM 88240 District II 1301 W. Grand Avenue, Artesia, NM 88210 District III 1000 Rio Brazos Road, Aztec, NM 87410 District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources

> Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

Form C-141 Revised October 10, 2003

Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

1220 S. St. Fran	cis Dr., Sant	a Fe, INM 87503		Sa	inta F	e, NM 875	05	_					
Release Notification and Corrective Action													
						OPERAT	FOR		🗍 Initi	al Report	মি	Final Report	
Name of Co	mnany: C	hevron North	America I	E & P Company		Contact: Ro	dnev Bailev				-24		
Address: 15	Smith R	d., Midland.	TX 7970	5		Telephone No.: (432) 687-7123 (office) or (432) 894-3519 (cell)							
Facility Nar	ne: NW E	umont Unit	Well #10	4		Facility Type: Plugged injection well							
Surface Ow	ner: State	of New Mex	rico	Mineral C)wner	r Lease No.							
				LOCA		NOFDEI	EACE						
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	Latitude <u>32° 39' 57.6" North Longitude 103° 19' 37.4 West</u>												
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Describe Are	a Affected	and Cleanup	Action Tal	cen.* Rhombus O	peratir	ng Co Ltd repo	rted a 20' x 30' a	rea arou	und well hea	ad and runo	ff 50 ya	ards into	
cattle trail. V	Vaiting on s	state approval	plan on di	gging out newly c	ontam	inated dirt, hau	ling it to an appr	oved di	sposal site a	nd replacin	g it wit	h fresh dirt.	
About 50 cut	for about 3	affected soil	was scrapp cted area e	ed by Rhombus (Operational Operation	ng Co, Ltd and -acres	piled on location	n. Relea	ase flowed s	south of wel	ladjace	ent to	
	ioi about 5			quais approximat	Cly 0.0	-acres.							
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I hereby certi regulations al	Ty that the i	information gi	iven above	the strue and complexity of the second complex	lete to a	the best of my	knowledge and u	ndersta	nd that purs	suant to NM	OCD n	ules and ndanger	
public health	or the envir	ronment. The	acceptance	ce of a C-141 repo	ort by th	ne NMOCD ma	arked as "Final R	eport" o	does not reli	ieve the ope	rator of	f liability	
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