GW - 070

INSPECTION



RECEIVED

2009 JUN 3 AM 11 33

MCA San Juan Operations Team Chevron U.S.A. Inc. PO Box 730 Aztec, NM 87410

June 2, 2009

Ref: to bgt

Mr. Leonard Lowe New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505

RE: Closure Report for the Rincon Lateral CDP #2 Site

Dear Mr. Lowe, Enclosed please find the Closure Report for the Rincon Lateral CDP #2 site located in Section 1, Township 26N, Range 7W, Rio Arriba County, New Mexico. This site maintains a Discharge Plan Permit GW-070.

If you have any questions or require additional information, please contact our office at (505)333-1901.

Respectfully Submitted,

Michael Archer HES Specialist Chevron North America

Enclosures: Closure Report

EACTICAL SOLUTIONS FOR A BETTER TOMORRALY F () F I V E D

CLOSURE REPORT 2009 JUN 3 AM 11 33

LOCATED AT: CHEVRON NORTH AMERICA'S RINCON LATERAL CDP #2 DISCHARGE PLAN PERMIT GW-070 SECTION 1, TOWNSHIP 26N, RNG 7W, RIO ARRIBA COUNTY, NEW MEXICO

PREPARED FOR: MR. LEONARD LOWE NEW MEXICO OIL CONSERVATION DIVISION 1220 SOUTH ST. FRANCIS DRIVE SANTA FE, NEW MEXICO 87505



PROJECT NO. 92270-0422 April 2009



May 28, 2009

Project No.92270-0422

Mr. Leonard Lowe New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Phone (505) 476-3492

RE: CLOSURE REPORT FOR THE RINCON LATERAL CDP #2 SITE

Dear Mr. Lowe,

Enclosed please find the *Closure Report* you requested from the Rincon Lateral CDP #2 site located in Section 1, Township 26N, Range 7W, Rio Arriba County, New Mexico. This site maintains a Discharge Plan Permit GW-070 and is owned and operated by Chevron North America.

We appreciate the opportunity to be of service. If you have any questions or require additional information, please contact our office at (505) 632-0615.

Respectfully Submitted, ENVIROTECH, INC. James McDaniel

Project Scientist jmcdaniel@envirotech-inc.com

Enclosures: Closure Report

Cc: Client File No. 92270

CHEVRON NORTH AMERICA CLOSURE REPORT LOCATED AT RINCON LATERAL CDP #2 DISCHARGE PLAN PERMIT GW-070 SECTION 1, TOWNSHIP 26N, RANGE 7W RIO ARRIBA COUNTY, NEW MEXICO

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Chevron North America Closure Report Rincon Lateral CDP #2 April 2009 Project No. 92270-0422 Page 1

INTRODUCTION

Envirotech, Inc. of Farmington, New Mexico, was contracted by Chevron North America to perform spill assessment and spill closure sampling activities at the Rincon Lateral CDP #2 site located in Section 1, Township 26N, Range 7W, Rio Arriba County, New Mexico; see *Figure 1, Vicinity Map*. This facility operates under a Discharge Plan Permit GW-070. A historical release of an unknown amount was discovered when a spill assessment was performed on the BGT at the above mentioned facility. The assessment was conducted at the client's request because Chevron was planning to replace the BGT. Activities included initial site assessment activities, sampling and analysis, removal of contaminated soil, documentation, and reporting.

ACTIVITIES PERFORMED

Envirotech, Inc. was contacted on October 22, 2008, to perform an assessment on a BGT located at the above mentioned facility. Upon arrival, a Chevron specific tailgate safety meeting was conducted and a site assessment was performed. Due to the proximity of the site to a first order tributary of the Little Palluche Wash, the site was ranked a 20 pursuant to the New Mexico Oil Conservation Division (NMOCD) Guideline for Remediation of Leaks, Spills, and Releases. This set the closure standard to 100 ppm total petroleum hydrocarbons (TPH) and 100 ppm organic vapors (OV). At this site, a composite sample was collected from beneath the location of the tank at approximately six (6) feet below ground surface (BGS) using a hand auger. The sample was analyzed in the field for TPH via USEPA Method 418.1. The sample returned results above the 100 ppm TPH standard determined for this site at 7,330 ppm, confirming that a release had occurred. The sample was then collected into a four (4)-ounce glass jar, capped headspace free, and transported with ice under chain of custody to Envirotech's laboratory to be analyzed for TPH via USEPA Method 8015, BTEX via USEPA Method 8021, and for chlorides via USEPA Method 4500B. The sample returned results that were below the 0.2 ppm benzene standard and the 50 ppm total BTEX standard, but above the 100 ppm TPH standard at 314 ppm. The sample returned results of 45 ppm total chlorides. There is currently no cleanup standard for chlorides per the NMOCD Guidelines for the Remediation of Leaks, Spills, and Releases. These results confirmed that a release had occurred and that excavation would be necessary. The original report submitted to Chevron can be referenced in Appendix D, Submitted Reports.

Envirotech, Inc. returned to the site on February 4, 2009, to perform confirmation sampling activities. Prior to Envirotech's arrival, the BGT had been removed and the spill area beneath it had been excavated to approximately 13' x 13' x 7' deep, by Crossfire. Two (2) composite samples were collected from this excavation. One (1) composite sample was collected from the four (4) walls. Each of these samples were analyzed in the field for TPH via USEPA Method 418.1 and for OV using a PID. Both samples returned results above the 100 ppm standard for TPH and for OV; see *Table 1, Analytical Results*. Excavation continued to approximately 19' x 19' x 10' deep, where additional composite samples were collected. A composite sample was collected from each of the four (4) walls at extents of excavation of 19' x 19' to determine the levels of

Chevron North America Closure Report Rincon Lateral CDP #2 April 2009 Project No. 92270-0422 Page 2

contamination in each wall, and one (1) sample was collected from the bottom of the excavation at 10' deep. Each of the five (5) samples were analyzed in the field for TPH via USEPA Method 418.1 and for OV using a PID. The sample collected from the south wall was below the 100 ppm standard for TPH and OV. Samples collected from the north wall, east wall, and west wall were all above the 100 ppm standard for TPH, with the samples collected from the north wall and the east wall returning results above the 100 ppm OV standard as well. The sample collected from the bottom was above the 100 ppm TPH standard and the 100 ppm OV standard. For sample analysis results, please see *Table 1, Analytical Results*. Due to the levels of contamination still present in this excavated area, Chevron was inclined to halt excavation for the time being and collected more data to determine to size of the release. The original report submitted to Chevron can be referenced in *Appendix D, Submitted Reports*.

Envirotech, Inc. returned to the site on April 2, 2009, to conduct an assessment of the site in order to determine the potential extents of the contamination. Using a flighted auger and a rotary hammer, several borings were performed surrounding the excavated area to determine the horizontal extents of the contamination. The horizontal extents of contamination were estimated to be 28' x 25'. A vertical boring was also done in the center of the excavation to determine the approximate vertical extents of the contamination as well. The vertical extents of the contamination were estimated at 22' BGS. This assessment estimated the extents of the excavation to be approximately 28' x 25' x 22' deep. A report detailing these assessment activities was submitted to Mr. Doug Elworthy with Chevron on April 3, 2009. The original report submitted to Chevron can be referenced in *Appendix D*, *Submitted Reports*.

On April 20, 2009, Envirotech, Inc. returned to the site to perform closure sampling activities. Prior to Envirotech's arrival, the area of contamination had been excavated to approximately 28' x 25' x 19' deep, by Crossfire. Four (4) composite samples were collected from the excavation, one (1) from each of the four (4) walls. Each of these samples were analyzed in the field for TPH via USEPA Method 418.1 and for OV using a PID. All four (4) samples returned results that were below the 100 ppm OV standard, and the samples collected from the east wall, west wall, and south wall all returned results that were below the 100 ppm TPH standard as well. Only the north wall returned results that were above the 100 ppm TPH standard at 860 ppm; see *Table 1, Analytical Results*. At this time, contaminated soil was still being cleaned out of the excavation, and Envirotech, Inc. would return to collect additional closure samples the next day.

On April 21, 2009, Envirotech, Inc. returned to the site to continue closure sampling activities. The excavation had been cleaned out and final extents of excavation were 30' x 30' x 19' deep; see *Figure 2, Site Map*. Three (3) composite samples were collected from the excavation. One (1) composite sample was collected from the bottom at 19' BGS and two (2) were collected from the north wall. One (1) sample was collected from the north wall near the bottom of the excavation and one (1) sample was collected from the north wall approximately in the middle of the wall. These samples were analyzed in the field for TPH via USEPA Method 418.1 and for OV using a PID. All three (3) samples returned results that were below both the 100 ppm TPH standard and the 100 ppm OV standard; see *Table 1, Analytical Results*.

Chevron North America Closure Report Rincon Lateral CDP #2 April 2009 Project No. 92270-0422 Page 3

Approximately 625 cubic yards of material was transported to Envirotech's NMOCD Permitted Soil Remediation Facility Landfarm #2; see *Appendix C, Bills of Lading*. Soil from Envirotech's virgin fill stockpile was transported to the Rincon Lateral CDP #2 site to backfill the excavated area.

SUMMARY AND CONCLUSIONS

Site assessment, closure sampling, and contaminated soil removal activities were performed for a Chevron Mid-Continent release located at the Rincon Lateral CDP #2 site located in Section 1, Township 26N, Range 7W, Rio Arriba County, New Mexico. A total of approximately 625 cubic yards of contaminated soil were transported to Envirotech's NMOCD Permitted Soil Remediation Facility Landfarm #2 at Hilltop, New Mexico; see *Appendix 3, Bills of Lading*. Envirotech, Inc. recommends that no further action is required in regards to this incident.

STATEMENT OF LIMITATIONS

Envirotech, Inc. has completed the site assessment, closure sampling, and contaminated soil hauling activities for a Chevron North America release at the Rincon Lateral CDP #2 site located in Section 1, Township 26N, Range 7W, Rio Arriba County, New Mexico. The work and services provided by Envirotech, Inc. were in accordance with the New Mexico Oil Conservation Division standards. All observations and conclusions provided here are based on the information and current site conditions found at the site of the incident.

The undersigned has conducted this service at the above referenced site. This work has been conducted and reported in accordance with generally accepted professional practices in geology, engineering, environmental chemistry, and hydrogeology.

We appreciate the opportunity to be of service. If you have any questions or require additional information, please contact our office at (505) 632-0615.

Respectfully Submitted,

ENVIROTECH, INC.



James McDaniel Project Scientist jmcdaniel@envirotech-inc.com

Reviewed by:



Kyle P. Kerr, CHMM
 Senior Environmental Scientist/Manager
 <u>kpkerr@envirotech-inc.com</u>



	BGT
30'	(AST)
LEGEND	SITE MAP Chevron North America Rincon Lateral #2 CDP
Spill Excavation	Rio Arriba County, New Mexico SCALE: NTS PROJECT N092270-0422 FIGURE NO. 1
Berm	REVISIONS
Fencing	NO. DATE BY DESCRIPTION MAP DRWN JPM DATE 4/30/09
	5796 U.S. HIGHWAY 64, FARMINGTON, NM 87401 505-632-0615

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TABLES

Table 1, Analytical Results

Table 1, Analytical ResultsClosure ReportChevron Mid-Continent'sRincon Lateral CDP #2Project No. 92270-0422April 2009

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DRO/GRO (ppm)	EPA Method 8015	100	314	NS	NS	NS	NS	SN	NS	NS	NS	NS	NS	NS	NS	NS	U.N.
	OVM (ppm)	100	NS	2988	814	2107	2634	268	6.5	9.9	76.2	0	0	0	10	1.2	6
Benzene (ppm)	EPA Method 8021	10	QN	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	SN
BTEX (ppm)	EPA Method 8021	50	3.87	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	SN
TPH (ppm)	EPA Method 418.1	100	7330	5820	384	2280	2790	1780	52	224	860	52	QN	QN	96	44	40
	Date	AN	10/22/2008	2/4/2009	2/4/2009	2/4/2009	2/4/2009	2/4/2009	2/4/2009	2/4/2009	4/20/2009	4/20/2009	4/20/2009	4/20/2009	4/21/2009	4/21/2009	4/21/2009
	Sample Description	NMOCD Standards	Below Tank Bottom @ 6' BGS	5Pt. Comp/Bottom @ 7'	4Pt. Comp/Walls	5Pt. Comp/Bottom @ 10'	East Wall - 13' x 13'	North Wall - 13' x 13'	South Wall - 13' x 13'	West Wall - 13' x 13'	North Wall - 28' x 25'	West Wall - 28' x 25'	East Wall - 28' x 25'	South Wall - 28' x 25'	Bottom Composite @ 19' BGS	North Wall #1 - 30' x 30'	North Wall #2 - 30' x 30'
Sample	Number	NA	£	-	2	n	4	5	9	7	-	2	n	4	~	2	ic.

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APPENDIX A

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Site Photography

CHEVRON MID-CONTINENT'S CLOSURE REPORT RINCON LATERAL CDP #2 RIO ARRIBA COUNTY, NEW MEXICO PROJECT NO. 92270-0422

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Photo 1: Excavation of spill area



Photo 2: Site overview

APPENDIX **B**

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Analytical Results



Client:	Chevron	Project #:	92270-0422
Sample No.:	1	Date Reported:	4/20/2009
Sample ID:	North Wall 28' x 25'	Date Sampled:	4/20/2009
Sample Matrix:	Soil	Date Analyzed:	5/1/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons8605.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2

Instrument calibrated to 200 ppm standard. Zeroed before each sample

Analyst

James McDaniel Printed

her lat

Greg Crabtree Printed



Client:	Chevron	Project #:	92270-0422
Sample No.:	2	Date Reported:	4/20/2009
Sample ID:	West Wall 28' x 25'	Date Sampled:	4/20/2009
Sample Matrix:	Soil	Date Analyzed:	5/1/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons 52 5.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: **Rincon Lateral CDP #2**

Instrument calibrated to 200 ppm standard. Zeroed before each sample

Analyst"

James McDaniel Printed

1 f.

Greg Crabtree Printed



Client:	Chevron	Project #:	92270-0422
Sample No.:	3	Date Reported:	4/20/2009
Sample ID:	East Wall 28' x 25'	Date Sampled:	4/20/2009
Sample Matrix:	Soil	Date Analyzed:	5/1/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons	ND	5.0
------------------------------	----	-----

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2

Instrument calibrated to 200 ppm standard. Zeroed before each sample

Apalyst

James McDaniel Printed

At

Greg Crabtree Printed



Client:	Chevron	Project #:	92270-0422
Sample No.:	4	Date Reported:	4/20/2009
Sample ID:	South Wall 28' x 25'	Date Sampled:	4/20/2009
Sample Matrix:	Soil	Date Analyzed:	5/1/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons	ND	5.0
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ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2

Instrument calibrated to 200 ppm standard. Zeroed before each sample

James McDaniel Printed

on Calt $\mathcal{N}_{\mathcal{J}}$

Greg Crabtree Printed



Cal. Date:	20-Apr-09		
Parameter	Standard Concentration mg/L	Concentration Reading mg/L	
ТРН	100 200 500 1000	202	

The accepted percent relative deviation (%RSD) of the calibration factor is less than 20% over the working range.

Analyst

Date

James McDaniel Print Name

Mu, Catt

Review

Greg Crabtree Print Name

5/1/09 Date



Client:	Chevron	Project #:	92270-0422
Sample No.:	1	Date Reported:	4/21/2009
Sample ID:	Bottom Comp @19' BGS	Date Sampled:	4/21/2009
Sample Matrix:	Soil	Date Analyzed:	5/1/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons	96	5.0
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ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2

Instrument calibrated to 200 ppm standard. Zeroed before each-sample

Rachel	Nielsen	
Printed		

James McDaniel Printed



Client:	Chevron	Project #:	92270-0422
Sample No.:	2	Date Reported:	4/21/2009
Sample ID:	North Wall #1 - 30' x 30'	Date Sampled:	4/21/2009
Sample Matrix:	Soil	Date Analyzed:	5/1/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons445.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2

Instrument calibrated to 200 ppm standard. Zeroed before each sample

Rachel Nielsen Printed

James McDaniel



Client:	Chevron	Project #:	92270-0422
Sample No.:	3	Date Reported:	4/21/2009
Sample ID:	North Wall #2 - 30' x 30'	Date Sampled:	4/21/2009
Sample Matrix:	Soil	Date Analyzed:	5/1/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons405.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2

Instrument calibrated to 200 ppm standard. Zeroed before each sample

Rachel Nielsen Printed

James McDaniel Printed



Cal. Date:	21-Apr-09			
Parameter	Standard Concentration mg/L	Concentration Reading mg/L	· · · · · · · · · · · · · · · · · · ·	
ТРН	100 200 500 1000	210		

The accepted percent relative deviation (%RSD) of the calibration factor is less than 20% over the working range.

Analyst

Rachael Nielsen Print Name Review 1

James McDaniel Print Name

Date

11/09 S Date

APPENDIX C

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Bill of Lading

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

12 10 10 State of New Mexico Energy Minerals and Natural Resources

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

92270 -0 430 Form C-138 Revised March 12, 2007

*Surface Waste Management Facility Operator and Generator shall maintain and make this documentation available for Division inspection.

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE
1. Generator Name and Address: Chevron in C/O of Rodney Bailey 15 Smith Road Midland TX 79705
2. Originating Site: Lateral CPD #2
 Location of Material (Street Address, City, State or ULSTR): Section 1 Township 26N Range 7W NW/SE – Rio Arriba County, New Mexico
4. Source and Description of Waste: Some of the dirt underneath both abandoned below ground tanks needs to be removed and land farmed. Samples from both sites (Chain of Custody Record 5635 and 5647) have been tested and the solids have been approved to be land farmed
Estimated Volume 500 yd ³ Known Volume (to be entered by the operator at the end of the haul)yd ³ (025) 5. GENERATOR CERTIFICATION STATEMENT OF WASTE STATUS
I, John Cannon, representative or authorized agent for Chevron do hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is: (Check the appropriate classification)
RCRA Exempt: Oil field wastes generated from oil and gas exploration and production operations and are not mixed with non- exempt waste. Operator Use Only: Waste Acceptance Frequency Monthly Weekly Per Load
RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items)
🗇 MSDS Information 🛛 RCRA Hazardous Waste Analysis 📋 Process Knowledge 📋 Other (Provide description in Box 4)
GENERATOR 19.15.36.15 WASTE TESTING CERTIFICATION STATEMENT FOR LANDFARMS
I, <u>John Cannon</u> , representative for <u>Chevron</u> do hereby certify that representative samples of the oil field waste have been subjected to the paint filter test and tested for chloride content and that the samples have been found to conform to the specific requirements applicable to landfarms pursuant to Section 15 of 19.15.36 NMAC. The results of the representative samples are attached to demonstrate the above-described waste conform to the requirements of Section 15 of 19.15.36 NMAC.
5. Transporter: Crossfire
OCD Permitted Surface Waste Management Facility
Name and Facility Permit #: Envirotech Inc. Soil Remediation Facility Permit # NM-01-0011
Address of Facility: Hilltop New Mexico
Method of Treatment and/or Disposal:
🗌 Evaporation 📋 Injection 🔲 Treating Plant 🖾 Landfarm 🗍 Landfill 🛄 Other
Waste Acceptance Status:
PRINT NAME: April E Pohl TITLE: Land Farm Administrator DATE: 4-16-09
SIGNATURE:

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HLORIDE TEST / LANDFARM HLORIDE TEST / LANDFARM FAINT FILTER / EMPLOYEE PAINT FILTER / EMPLOYEE Material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and onal materials have been added. COMPANY <i>Every Every </i>										
HLORIDE TEST 7 LANDFARM HLORIDE TEST 7 LANDFARM PAINT FILTER 7 EMPLOYEE TEST naterial hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and onal materials have been added." COMPANY <i>Envire</i> 7.200 SIGNATURE 4.000 SIGNATURE 4.0000 SIGNATURE 4.00000 SIGNATURE 4.00000 SIGNATURE 4.00000 SIGNATURE 4.00000 SIGNATURE 4.000										
TEST 1 / 1 multiple in the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and onal materials have been added. COMPANY <i>Critice Tree</i> SignATURE SignATURE (COMPANY Critice Tree) (HLORIDE TEST	- LANDFARM EMPLOYEE:	Decu	X V		60	NOTES: CONT	RED	NPR 2	
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I Lading Manifest # 33235 Jew Mexico 87401 Date U - 17 - 07 JOB# 000000000000000000000000000000000000	Relia COMMANY Intra-I
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APPENDIX D

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Submitted Reports

October 23, 2008

Project No.92270-0337

Mr. Rodney Bailey Environmental Specialist Chevron USA 15 Smith Road Midland, TX 79705

Phone: (432) 687-7123 Cell: (432) 894-3519

RE: ENVIRONMENTAL SAMPLING FOR A BELOW GRADE TANK CLOSURE AT THE RINCON LATERAL #2 COMPRESSOR STATION, RIO ARRIBA COUNTY, NEW MEXICO

Dear Mr. Bailey,

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Enclosed, please find the field notes and analyses for a below-grade tank (BGT) closure performed at the Rincon Lateral #2 Compressor Station. A 5-point composite sample was collected from beneath the former location of a BGT for spill confirmation. The composite was analyzed in the field for total petroleum hydrocarbons (TPH) via USEPA Method 418.1 and for organic vapors using a Photo Ionization Detector (PID). The sample was above the 100 ppm limit for TPH therefore confirming that a release had occurred.

The cleanup standard for the site was then determined to be 100 ppm TPH and 100 ppm for organic vapors based on the proximity of the site to a wash. Field analysis showed a TPH reading of approximately 7330 ppm and a PID reading of 337 ppm directly below the tank. Envirotech recommends further excavation until samples are below the site specific closure standards.

Respectfully Submitted, ENVIROTECH, INC.

Greg Crabtree Project Engineer gcrabtree@envirotech-inc.com

Enclosure: Field Analysis


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EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:	Chevron	Project #:	92270-155
Sample No.:	1	Date Reported:	10/23/2008
Sample ID:	Below Bottom of Tank@ 6' BGS	Date Sampled:	10/22/2008
Sample Matrix:	Soil	Date Analyzed:	10/22/2008
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons7,3305.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral #2 Compressor Station

Instrument callibrated to 200 ppm standard. Zeroed before each sample

inchner

Josh Kirchner Printed

Review

Greg Crabtree



Cal. Date:	22-Oct-08		
Parameter	Standard Concentration mg/L	Concentration Reading mg/L	
ТРН	100 200 500 1000	201	

The accepted percent relative deviation (%RSD) of the calibration factor is less than 20% over the working range.

Analyst

Josh Kirchner Print Name May Callo Review

10/24/08 Date

10/23/08

Date

Greg Crabtree Print Name



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EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

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Client: Sample ID: Laboratory Number: Chain of Custody: Sample Matrix: Preservative: Condition:	Chevron 1 47895 5635 Soil Cool Intact		Project #: Date Reported: Date Sampled: Date Received: Date Analyzed: Date Extracted: Analysis Requested:		92270-0335 10-29-08 10-22-08 10-27-08 10-28-08 10-27-08 BTEX
Parameter		Concentration (ug/Kg)		Det. Limit (ug/Kg)	
Benzene Toluene Ethylbenzene p,m-Xylene o-Xylene		ND 124 181 2,950 611		0.9 1.0 1.0 1.2 0.9	
Total BTEX		3,870			

ND - Parameter not detected at the stated detection limit.

Surrogate Reco	overies:	Parameter	Percent Recovery
···· • - ·····•·		Fluorobenzene	96.0 %
		1,4-difluorobenzene	96.0 %
		Bromochlorobenzene	96.0 %
References:	Method Decemb	5030B, Purge-and-Trap, Test Methods for Evaluer 1996.	uating Solid Waste, SW-846, USEPA,
	Method USEPA,	8021B, Aromatic Volatile Organics, Test Method December 1996.	ds for Evaluating Solid Waste, SW-846
Comments:	Latera	12	

Analyst

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EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

Client: Sample ID: Laboratory Number: Sample Matrix: Preservative: Condition:	N 1 4 S N N	I/A 0-28-BT QA/QC 7828 :oil I/A I/A		Project #: Date Reported: Date Sampled: Date Received: Date Analyzed: Analysis:		N/A 10-29-08 N/A N/A 10-28-08 BTEX
Calibration and Detection Limits	»«(بأوباً)»	J.Cal.RE	SC:Cal RF; Accept, Ran	%Diff. ge:0~15%:	Blanks Conci	Détect:
Benzene Toluene Ethylbenzene p,m-Xylene o-Xylene		4.8971E+007 3.6215E+007 2.7584E+007 5.9847E+007 2.7347E+007	4.9069E+007 3.6287E+007 2:7639E+007 5.9967E+007 2.7402E+007	0.2% 0.2% 0.2% 0.2% 0.2%	ND ND ND ND ND	0.1 0.1 0.1 0.1 0.1
Duplicate Conci (i	ų́g/Kg);	3Sample	Duplicate	%Diff.	÷şgns⊼lişeçoX	Detectabinit
Benzene Toluene Ethylbenzene p,m-Xylene o-Xylene		ND 4.0 2.5 5.5 3.1	ND 4.1 2.4 5.6 2.9	0.0% 2.5% 4.0% 1.8% 6.5%	0 - 30% 0 - 30% 0 - 30% 0 - 30% 0 - 30%	0.9 1.0 1.0 1.2 0.9
Spike/Conc-(úg/k	(ġ):	Sâmple	Amount Spiked	Spiked Sample	% Recovery	Accept Range:
Benzene		ND	50.0	49.0	98.0%	39 - 150
Toluene		4.0	50.0	49.0	90.7%	46 - 148
Ethylbenzene		2.5	5 0.0	50.5	96.2%	32 - 160
p,m-Xylene o-Xylene		5.5 3.1	100 50.0	98 50.1	92.4% 94.4%	46 - 148 46 - 148
ND - Parameter not d	letected at the stated o	letection limit.				
References:	Method 5030B, Purge December 1996. Method 8021B, Arom Photoionization and/o	-and-Trap, Test Meth atic and Halogenated r Electrolytic Conduct	nods för Evaluating Volatiles by Gas Cł livity Detectors, SW	Solid Waste, SW-84 hromatography Using -846, USEPA Decen	6, USEPA, 9 nber 1996.	
Comments:	QA/QC for Samp	bles 47828, 478	30, 47873, 4789)1, 47892, 47894	4, 47895, 47897 LDR-	7, and 47907.
Analyst	\mathcal{D}			Review		1



EPA METHOD 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

Client: Project #: 92270-0335 Chevron 10-29-08 Sample ID: 1 Date Reported: 47895 10-22-08 Laboratory Number: Date Sampled: 10-27-08 Chain of Custody No: 5635 Date Received: Date Extracted: 10-27-08 Sample Matrix: Soil Preservative: Date Analyzed: 10-28-08 Cool 8015 TPH Condition: Intact Analysis Requested: Det. Limit Concentration Parameter (mg/Kg) (mg/Kg) 0.2 Gasoline Range (C5 - C10) 178 Diesel Range (C10 - C28) 136 0.1 314 0.2 **Total Petroleum Hydrocarbons**

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ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: Lateral 2

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Analyst

Review

5796 U.S. Highway 64 • Farmington, NM 87401 • Tel 505-632-0615 • Fax 505-632-1865



EPA Method 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

Quality Assurance Report

Client:	QA/QC		Project #:		N/A
Sample ID:	10-28-08 QA/	ac	Date Reported:		10-29-08
Laboratory Number:	47828		Date Sampled:		N/A
Sample Matrix:	Methylene Chlor	ride	Date Received:		N/A
Preservative:	N/A		Date Analyzed:		10-28-08
Condition:	N/A		Analysis Reque	sted:	ТРН
and a first to program on warmonia	I Cal Date	PCal(RE-)	CiCal RFA	% Difference	Accept Range
Gasoline Range C5 - C10	05-07-07	1.0103E+003	1.0107E+003	0.04%	0 - 15%
Diesel Range C10 - C28	05-07-07	9.9348E+002	9.9387E+002	0.04%	0 - 15%
Blank Conc: (mg/L=mg/Kg)		Concentrations	• • •	Detection.Limit	
Gasoline Range C5 - C10		ND	· · ·	0.2	
Diesel Range C10 - C28		ND		0.1	
Total Petroleum Hydrocarbons		ND		0.2	
Duplicate Conc. (mg/Kg)	Sample	Duplicate	% Difference	Accept. Range	
Gasoline Range C5 - C10	ND	ND	0.0%	0 - 30%	
Diesel Range C10 - C28	ND	ND	0.0%	0 - 30%	
Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery.	Accept: Range
Gasoline Range C5 - C10	ND	250	246	98.4%	75 - 125%
Diesel Range C10 - C28	ND	250	252	101%	75 - 125%

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments:

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QA/QC for Samples 47828, 47830, 47891, 47892, 47894, 47895, and 47897.

Analyst

Review

envirotech Analytical Laboratory

Chevron

Sample ID: 1 Date Reported: 10-30-08 Lab ID#: 47895 Date Sampled: 10-22-08 Sample Matrix: Soil Extract Date Received: 10-27-08 Preservative: Cool Date Analyzed: 10-29-08 Condition: Intact Chain of Custody: 5635 Concentration (mg/L) Parameter **Total Chloride** 45

Reference:

Client:

U.S.E.P.A., 4500B, "Methods for Chemical Analysis of Water and Wastes", 1983. Standard Methods For The Examination of Water And Waste Water", 18th ed., 1992.

Project #:

92270-0335

Comments:

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Lateral 2.

Analys

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Project Name / Loca	Sampler Name:	Client No.:	0.01.771	e Lab No.	47895	<u> </u>	йй	<i>й й</i>	йй		ŭ ŭ	ŭ	<i>й й</i>	й й	<i>й й</i>				-		5796 U.S. I
				mple Sampl ate Time	u 125					-								_			
Client:	Client Address:	Client Phone No.:		Sample No./ Sa Identification D	2 1											Relinquished by: (Signature		Hélinquished by: (Signature	Relinquished by: (Signature		

Benvirotech

February 6, 2009

Project No. 92270-0337

Mr. Doug Elworthy Chevron North America 332 County Road 3100 P.O. Box 370 Aztec, New Mexico 87410

RE: CONFIRMATION SAMPLING DOCUMENTATION LATERAL #2 CDP, RIO ARRIBA COUNTY, NEW MEXICO

Dear Mr. Elworthy,

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Enclosed please find the field notes and analyses for confirmation sampling activities performed at the Lateral #2 CDP located in Section 1, Township 26N, Range 7W, Rio Arriba County, New Mexico. Prior to Envirotech's arrival, the area of release had been excavated to approximately 13' x 13' x 7' deep. Upon Envirotech's arrival, a brief site assessment was conducted and the cleanup standard for the site was determined to be 100 ppm for TPH and 100 ppm for organic vapors, pursuant to New Mexico Oil Conservation Division (NMOCD) Guidelines for Remediation of Leaks, Spills, and Releases.

Two (2) samples were collected from the excavation. One composite (1) sample was collected from the four (4) walls and one (1) composite sample was collected from the bottom of the excavation at seven (7) feet below ground surface (BGS). The samples were analyzed in the field for total petroleum hydrocarbons (TPH) via USEPA Method 418.1 and for organic vapors using a Photo Ionization Detector (PID). Both samples were above the regulatory standards of 100 ppm for TPH and 100 ppm for organic vapors; therefore, excavation continued to approximately $19' \times 19' \times 10'$ deep.

Five (5) additional composite samples were collected from the excavation. Four (4) composite samples were collected from each of the four (4) walls and one (1) composite was collected from the bottom of the excavation at ten (10) feet BGS. The five (5) composite samples were analyzed in the field for TPH using USEPA Method 418.1 and for organic vapors using a PID. The sample collected from the south wall was below the regulatory standards of 100 ppm for TPH and 100 ppm for organic vapors. The samples collected from the north and east walls were above the regulatory standards of 100 ppm for organic vapors. The sample collected from the west wall was below the regulatory standard of 100 ppm for organic vapors, however, the sample was above the regulatory standard of 100 ppm for TPH. Envirotech, Inc. recommends further excavation and additional sampling activities be performed at this site.

Respectfully Submitted,

ENVIROTECH, INC.

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Roynell Benally Sr. Environmental Technician rbenally@envirotech-inc.com

Enclosure(s) Field Notes Analytical Results

Cc: Client File No. 92270

Table 1, Analytical ResultsLateral #2 CDPConfirmation SamplingProject No. 92270-0337

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Sample Number	Sample Description	Date	(mdd) MVO	USEPA Method 418.1
NA	NMOCD Standards	NA	100	100
~	5Pt. Comp/Bottom @ 7'	2/4/2009	2988	5820
2	4Pt. Comp/Walls	2/4/2009	814	384
e	5Pt. Comp/Bottom @ 10'	2/4/2009	2107	2280
4	East Wall	2/4/2009	2634	2790
5	North Wall	2/4/2009	268	1780
9	South Wall	2/4/2009	6.5	52
2	West Wall	2/4/2009	9.9	244
* Numbere in BOLD	Dare shows NMOCD Stand	arde		

* Numbers in BOLD are above NMOCD Standards



Client:	Chevron	Project #:	92270-0337
Sample No.:	1	Date Reported:	2/4/2009
Sample ID:	5pt Comp/Bottom @ 7'	Date Sampled:	2/4/2009
Sample Matrix:	Soil	Date Analyzed:	5/1/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons 5,820 5.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: **Rincon Lateral CDP #2**

Instrument calibrated to 200 ppm standard. Zeroed before each sample

Analyst

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Roynell Benally Printed

James McDaniel Printed



Client:	Chevron	Project #:	92270-0337
Sample No.:	2	Date Reported:	2/4/2009
Sample ID:	4pt Comp/Walls	Date Sampled:	2/4/2009
Sample Matrix:	Soil	Date Analyzed:	5/1/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons	384	5.0
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ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2

Instrument calibrated to 200 ppm standard. Zeroed before each sample

Analyst

Roynell Benally Printed

James	McDaniel		
Printed			



5.0

Client:	Chevron	Project #:	92270-0337
Sample No.:	3	Date Reported:	2/4/2009
Sample ID:	5pt Comp/Bottom @10'	Date Sampled:	2/4/2009
Sample Matrix:	Soil	Date Analyzed:	5/1/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons 2,280

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2

Instrument calibrated to 200 ppm standard. Zeroed before each sample

Analyst

Roynell	Benal	ly	
Printed			

*

James McDaniel
Printed



Client:	Chevron	Project #:	92270-0337
Sample No.:	4	Date Reported:	2/4/2009
Sample ID:	East Wall - 19' x 19'	Date Sampled:	2/4/2009
Sample Matrix:	Soil	Date Analyzed:	5/1/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons 2,	790 5.0
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ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2

Instrument calibrated to 200 ppm standard. Zeroed before each sample

Analyst

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Roynell Benally	 _	
Printed		

James McDaniel Printed



Client:	Chevron	Project #:	92270-0337
Sample No.:	5	Date Reported:	2/4/2009
Sample ID:	North Wall - 19' x 19'	Date Sampled:	2/4/2009
Sample Matrix:	Soil	Date Analyzed:	5/1/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons1,7805.0

ND = Parameter not detected at the stated detection limit.

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References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2

Instrument calibrated to 200 ppm standard. Zeroed before each sample

Analyst

Roynell	Benally	
Printed		

James McDaniel Printed



Client:	Chevron	Project #:	92270-0337
Sample No.:	6	Date Reported:	2/4/2009
Sample ID:	South Wall - 19' x 19'	Date Sampled:	2/4/2009
Sample Matrix:	Soil	Date Analyzed:	5/1/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons525.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2

Instrument calibrated to 200 ppm standard. Zeroed before each sample

Analyst

Roynell Benally Printed

James McDaniel



Client:	Chevron	Project #:	92270-0337
Sample No.:	7	Date Reported:	2/4/2009
Sample ID:	West Wall - 19' x 19'	Date Sampled:	2/4/2009
Sample Matrix:	Soil	Date Analyzed:	5/1/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons2245.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2

Instrument calibrated to 200 ppm standard. Zeroed before each sample

Analyst

Roynell Benally Printed

و به یو است

James McDaniel Printed



Cal. Date: 4-Feb-09

Parameter	Standard Concentration mg/L	Concentration Reading mg/L	
ТРН	100 200 500 1000	197	

The accepted percent relative deviation (%RSD) of the calibration factor is less than 20% over the working range.

Analyst

Roynell Benally Print Name Review

James McDaniel Print Name

09 Date

109



April 16, 2009

Project No. 92270-0422

Mr. Doug Elworthy Chevron North America 126 Rock Point Drive, Suite B Durango, Colorado 81301

Cell: (970) 759-1204

RE: SPILL ASSESSMENT AT THE RINCON LATERAL CDP #2 COMPRESSOR STATION

Dear Mr. Elworthy:

On April 2, 2009, Envirotech, Inc. conducted an assessment at the above mentioned location to delineate the extent of contamination around the area of excavation where a below grade tank (BGT) had previously been located. Prior to Envirotech's arrival the area had been excavated to extents of 23' x 20' x 8' deep. Upon arrival, a brief site assessment was performed and the site was ranked pursuant to the New Mexico Oil Conservation Divisions Guidelines for Remediation of Leaks, Spills and Releases. The site was ranked a 20 due to the proximity of the spill area to a nearby wash. The wash is a first order tributary of the Little Palluche Wash. This set the closure standards to 100 ppm total petroleum hydrocarbons (TPH) and 100 ppm organic vapors.

A composite sample was collected from each of the four (4) walls of the excavation and one (1) from the bottom at eight (8) feet below ground surface (BGS). Each of the samples were analyzed in the field for TPH via USEPA Method 418.1 and organic vapors using a Photo-Ionization Detector (PID). The bottom sample at eight (8) feet BGS, the west wall sample and the north wall sample returned results that were above the 100 ppm TPH standard for this site; but the east wall sample and the south wall sample were both below the 100 ppm TPH standard. All samples except the one collected from the north wall returned results that were below the 100 ppm organic vapor standard; see *Analytical Results*.

Using a rotary hammer and hand auger, Envirotech personnel augured five (5) boreholes around the area of the excavation to delineate the horizontal extent of the contamination. Samples were collected from borehole #1 at seven (7) feet BGS, borehole #2 at seven (7) feet BGS and nine (9) feet BGS, borehole #3 at nine (9) feet BGS, borehole #4 at nine (9) feet BGS, and borehole #5 at ten (10) feet BGS. All samples were analyzed in the field for TPH via USEPA Method 418.1 and for organic vapors using a PID. See *Site Map* for borehole locations. All samples returned results that were below the 100 ppm TPH and 100 ppm organic vapors standard, except the sample collected from nine (9) feet BGS in soil boring #3; see *Analytical Results*.

At this time, a borehole was hand augered in the middle of the opened excavation to determine the vertical extents of the contamination. A sample was collected from this borehole at twelve (12) feet BGS, sixteen (16) feet BGS, eighteen (18) feet BGS, twenty (20) feet BGS, and twentytwo (22) feet BGS. All samples were analyzed in the field for organic vapors using a PID. Samples from eighteen (18) feet BGS and twenty-two (22) feet BGS were also analyzed in the field for TPH via USEPA Method 418.1. The samples collected from twelve (12) feet BGS, sixteen (16) feet BGS, and eighteen (18) feet BGS were above the 100 ppm standard for organic vapors, with the sample collected from eighteen (18) feet BGS returned results that were above the 100 ppm TPH standard as well; see *Analytical Results*. Samples collected from twenty (20) feet BGS and from twenty-two (22) feet BGS were below the 100 ppm organic vapor standard, with the sample collected at twenty-two (22) feet BGS returning results that were below the 100 ppm TPH standard as well.

The table below summarizes the field sampling results.

Sample Name	TPH (ppm)	OV (ppm)
NMOCD Closure Standard	100	100
North Wall	7450	1294
South Wall	44	2
East Wall	72	59
West Wall	120	4
Bottom @ 8' bgs	112	66
Borehole 1 @ 7' bgs	40	2
Borehole 2 @ 7' bgs	48	2
Borehole 2 @ 9' bgs	52	2
Borehole 3 @ 9' bgs	152	2
Borehole 4 @ 9' bgs	16	2
Borehole 5 @ 10' bgs	92	0
Bottom @ 12' bgs	NS	1911
Bottom @ 16' bgs	NS	911
Bottom @ 18' bgs	4830	394
Bottom @ 20' bgs	NS	81
Bottom @ 22' bgs	40	7

Based on the field analysis Envirotech, Inc. recommends that the excavation be extended to the north by five (5) feet, to the west five (5) feet, and twenty-two (22) feet deeper to the final extents of 28' x 25' x 22' deep. Estimated cubic yardage of contaminated soil to be removed is 543 cubic yards. Actual yardage may vary once excavation is complete.

We appreciate the opportunity to be of service. Should you have any questions or require additional information, please contact our office at (505) 632-0615.

Respectfully Submitted ENVIROTECH. IN James McDaniel

Project Scientist jmcdaniel@envirotech-inc.com

Enclosure: Laboratory Results and Site Map

Cc: Client File No. 92115



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EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:	Chevron Production	Project #:	92270-0422
Sample No.:	1	Date Reported:	4/3/2009
Sample ID:	North Wall	Date Sampled:	4/2/2009
Sample Matrix:	Soil	Date Analyzed:	4/2/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

	Det.
Concentration	Limit
(mg/kg)	(mg/kg)
•	Concentration (mg/kg)

Total Petroleum Hydrocarbons7,4505.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2 Compressor Station

Instrument calibrated to 200 ppm standard. Zeroed before each sample

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EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:	Chevron Production	Project #:	92270-0422
Sample No.:	2	Date Reported:	4/3/2009
Sample ID:	South Wall	Date Sampled:	4/2/2009
Sample Matrix:	Soil	Date Analyzed:	4/2/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2 Compressor Station

Instrument calibrated to 200 ppm standard. Zeroed before each sample

Analyst

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Client:	Chevron Production	Project #:	92270-0422
Sample No.:	3	Date Reported:	4/3/2009
Sample ID:	East Wall	Date Sampled:	4/2/2009
Sample Matrix:	Soil	Date Analyzed:	4/2/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons	72	5.0
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ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2 Compressor Station

Instrument calibrated to 200 ppm standard. Zeroed before each sample

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EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:	Chevron Production	Project #:	92270-0422
Sample No.:	4	Date Reported:	4/3/2009
Sample ID:	West Wall	Date Sampled:	4/2/2009
Sample Matrix:	Soil	Date Analyzed:	4/2/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

	Concentration	Det. Limit	
Parameter	(mg/kg)	(mg/kg)	
Total Petroleum Hydrocarbons	120	5.0	

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2 Compressor Station

Instrument calibrated to 200 ppm standard. Zeroed before each sample

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Client:	Chevron Production	Project #:	92270-0422
Sample No.:	5	Date Reported:	4/3/2009
Sample ID:	Bottom @ 8' bgs	Date Sampled:	4/2/2009
Sample Matrix:	Soil	Date Analyzed:	4/2/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons1125.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2 Compressor Station

Instrument calibrated to 200 ppm standard. Zeroed before each sample

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EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:	Chevron Production	Project #:	92270-0422
Sample No.:	6	Date Reported:	4/3/2009
Sample ID:	Borehole 1 @ 7' bgs	Date Sampled:	4/2/2009
Sample Matrix:	Soil	Date Analyzed:	4/2/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Total Petroleum Hydrocarbons	40	5.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2 Compressor Station

Instrument calibrated to 200-ppm standard. Zeroed before each sample

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Client:	Chevron Production	Project #:	92270-0422
Sample No.:	7	Date Reported:	4/3/2009
Sample ID:	Borehole 2 @ 7' bgs	Date Sampled:	4/2/2009
Sample Matrix:	Soil	Date Analyzed:	4/2/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Total Petroleum Hydrocarbons	48	5.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2 Compressor Station

Instrument calibrated to 200 ppm standard. Zeroed before each sample

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EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:	Chevron Production	Project #:	92270-0422
Sample No.:	8	Date Reported:	4/3/2009
Sample ID:	Borehole 2 @ 9' bgs	Date Sampled:	4/2/2009
Sample Matrix:	Soil	Date Analyzed:	4/2/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

52	5.0
	52

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2 Compressor Station

Instrument calibrated to 200 ppm standard. Zeroed before each sample

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EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:	Chevron Production	Project #:	92270-0422
Sample No.:	9	Date Reported:	4/3/2009
Sample ID:	Borehole 3 @ 9' bgs	Date Sampled:	4/2/2009
Sample Matrix:	Soil	Date Analyzed:	4/2/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2 Compressor Station

Instrument calibrated to 200 ppm standard. Zeroed before each sample

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Client:	Chevron Production	Project #:	92270-0422
Sample No.:	10	Date Reported:	4/3/2009
Sample ID:	Borehole 4 @ 9' bgs	Date Sampled:	4/2/2009
Sample Matrix:	Soil	Date Analyzed:	4/2/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons	16	5.0
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ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2 Compressor Station

Instrument calibrated to 200 ppm standard. Zeroed before each sample

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EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:	Chevron Production	Project #:	92270-0422
Sample No.:	11	Date Reported:	4/3/2009
Sample ID:	Borehole 5 @ 10' bgs	Date Sampled:	4/2/2009
Sample Matrix:	Soil	Date Analyzed:	4/2/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Total Petroleum Hydrocarbons	92	5.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2 Compressor Station

Instrument calibrated to 200 ppm standard. Zeroed before each sample

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EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:	Chevron Production	Project #:	92270-0422
Sample No.:	12	Date Reported:	4/3/2009
Sample ID:	Bottom @ 18' bgs	Date Sampled:	4/2/2009
Sample Matrix:	Soil	Date Analyzed:	4/2/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons	4,830	5.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2 Compressor Station

Instrument calibrated to 200 ppm standard. Zeroed before each sample

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Client:	Chevron Production	Project #:	92270-0422
Sample No.:	13	Date Reported:	4/3/2009
Sample ID:	Bottom @ 22' bgs	Date Sampled:	4/2/2009
Sample Matrix:	Soil	Date Analyzed:	4/2/2009
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons 4	0 5.0
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ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Rincon Lateral CDP #2 Compressor Station

Instrument calibrated to 200 ppm standard. Zeroed before each sample



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CONTINUOUS CALIBRATION EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Cal. Date: 2-Apr-09

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Parameter	Standard Concentration mg/L	Concentration Reading mg/L	
трн	100		
	200	190	
	500		
	1000		

The accepted percent relative deviation (%RSD) of the calibration factor is less than 20% over the working range.

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David Estes Field Coordinator San Juan FMR MidContinent/Alaska SBU

Chevron North America Exploration and Production

Chevron U.S.A. Production Company PO Box 730 Farmington, NM 87410 Tel 505-334-7117

September 22, 2008

Mr. Leonard Lowe Oil Conservation Division New Mexico Energy, Minerals and Natural Resources Department 1220 South St. Francis Drive Santa Fe, New Mexico 87505

RE: Hydrostatic Test Results of Underground Piping, GW-070 Chevron USA Inc. Lateral #2 Compressor Station Rio Arriba County, New Mexico

Dear Mr. Lowe,

Chevron USA Inc. operates the Lateral #2 Compressor Station located in Section 1, Township 26 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. As requested by you during the audit of the site on April 21, 2008 and in the Inspection Report dated May 7, 2008, enclosed are results of the hydrostatic tests of the underground pipelines at Lateral #2 Compressor Station.

If you have any questions, please contact me at 505-334-7117 or Suzanne Shore at 281-561-3920.

Regards,

David Estes

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HOWE (NOTE) Open item # 2 from e-mail. closed. 69.25.0F









From: Lowe, Leonard, EMNRD

Sent: Thursday, September 25, 2008 9:42 AM

To: 'Shore, Suzanne'

Cc: Powell, Brandon, EMNRD

Subject: RE: Chevron response to inspections of GW-70

Suzanne,

Thank you for the response.

A few requests:

These items will still be open until all information is submitted to the OCD

1. Send me test samples and updates for the removed BGT until area is completed remediated.

2. The OCD will be waiting on hydrostatic testing that was completed.

3. Photos of the bermed area will be expected when done.

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Leonard Lowe

Environmental Engineer Oil Conservation Division/EMNRD 1220 S. St. Francis Drive Santa Fe, N.M. 87505 Office: 505-476-3492 Fax: 505-476-3462 E-mail: leonard.lowe@state.nm.us Website: http://www.emnrd.state.nm.us/ocd/

From: Shore, Suzanne [mailto:shores@chevron.com]
Sent: Friday, September 19, 2008 3:29 PM
To: Lowe, Leonard, EMNRD
Cc: Bailey, Rodney G; Powell, Brandon, EMNRD; Price, Wayne, EMNRD
Subject: Chevron response to inspections of GW-70

Mr. Lowe,

Attached is Chevron's response to the inspection of our Lateral #2 Compressor Station covered by GW-70 Permit. Additional documentation not provided will be forthcoming. Please contact me if you have any questions.

Sincerely,

Suzanne Shore Waste and Water Specialist MidContinent/Alaska SBU

Chevron North America Exploration and Production

11111 S. Wilcrest Dr C2304, Houston TX 77099 Tel 281 561 3920 Fax 281 561 3702 <u>shores@chevron.com</u> From: Shore, Suzanne
Sent: Friday, September 12, 2008 12:43 PM
To: 'Lowe, Leonard, EMNRD'
Cc: Bailey, Rodney G; 'Powell, Brandon, EMNRD'; 'Price, Wayne, EMNRD'
Subject: RE: Chevron response to inspections of GW-70, GW-82, GW-244

Mr. Lowe,

As discussed with you earlier today, an inspection follow-up report complete with photographs and associate documentation will be provided next week.

Thank you,

Suzanne Shore Waste and Water Specialist MidContinent/Alaska SBU

Chevron North America Exploration and Production

11111 S. Wilcrest Dr C2304, Houston TX 77099 Tel 281 561 3920 Fax 281 561 3702 <u>shores@chevron.com</u>

From: Shore, Suzanne
Sent: Friday, September 05, 2008 11:45 AM
To: Lowe, Leonard, EMNRD
Cc: Bailey, Rodney G; Powell, Brandon, EMNRD; Price, Wayne, EMNRD
Subject: RE: Chevron response to inspections of GW-70, GW-82, GW-244

Mr. Lowe,

We apologize for not responding sooner. I am soliciting information from our personnel regarding the status of these concerns and should have an update to you early next week.

Thank you,

Suzanne Shore Waste and Water Specialist MidContinent/Alaska SBU

Chevron North America Exploration and Production

11111 S. Wilcrest Dr C2304, Houston TX 77099 Tel 281 561 3920 Fax 281 561 3702 <u>shores@chevron.com</u>

From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us] **Sent:** Thursday, September 04, 2008 5:24 PM To: Shore, Suzanne Cc: Bailey, Rodney G; Powell, Brandon, EMNRD; Price, Wayne, EMNRD Subject: Chevron response to inspections of GW-70, GW-82, GW-244 Importance: High

Suzanne Shore,

The OCD had performed inspections of these three referenced Chevron facilities on April 21, 2008.

GW-070, Lateral # 2 GW-082, Lateral # 1 GW-244, Lateral # 4

The OCD had given Chevron 120 days to resolve these concerns stated within the inspection letter. The 120 days is done.

When do we expect to get a final report from Chevron, "Chevron shall submit to the OCD a report with photographs, where applicable, for each of these findings within their prescribed time."?

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Leonard Lowe

Environmental Engineer Oil Conservation Division/EMNRD 1220 S. St. Francis Drive Santa Fe, N.M. 87505 Office: 505-476-3492 Fax: 505-476-3462 E-mail: <u>leonard.lowe@state.nm.us</u> Website: <u>http://www.emnrd.state.nm.us/ocd/</u>

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Suzanne Shore Waste and Water Specialist MidContinent/Alaska SBU **Chevron North America Exploration and Production** Chevron U.S.A. Production Company 11111 S. Wilcrest Dr. Houston, TX 77099 Tel 281-561-3920

September 19, 2008

Mr. Leonard Lowe
Oil Conservation Divsion
New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

RE: Inspection Report Follow-up, GW-070 Chevron USA Inc. Lateral #2 Compressor Station Rio Arriba County, New Mexico

Dear Mr. Lowe,

Chevron USA Inc. operates the Lateral #2 Compressor Station located in Section 1, Township 26 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. On April 21, 2008, an inspection of the site was conducted by you and Mr. Brandon Powell of the Oil Conservation Divison of the New Mexico Energy, Minerals, and Natural Resources Department. The Inspection Report dated May 7, 2008 identified areas of concern warranting attention within three months. Further discussion between you and Mr. Rodney Bailey on May 8, 2008 about Antelope Stipulations delaying our activities resulted in an extension to a total of one hundred twenty days to address the items. In response to the Inspection Report and per the discussion on May 8, 2008, this letter describes how the inspection findings are being corrected.

Please note that some of the items are being addressed as part of the installation of a new compressor on location. The compressor installation modifications were provided to you on August 15, 2008 for review and were approved on August 25, 2008.

Finding	Description Inspection Report (May 7, 2008)	Action
1	Site facility sign denotes incorrect Discharge Plan	Photo 1: The sign has been
	number; it should be GW-070. Chevron has 3 months to	updated with the correct
	correct this.	Discharge Permit number.
2.	Lines flowing in to this BGT can not be identified.	Photo 2: BGT has been
	Chevron has 3 months identify these lines and annotate in	removed. Facility schematic
	on their facility schematic and submit to the OCD.	was updated and submitted in
		August 2008 with proposed
		modifications of below grade
		tanks on site.
3.	The leak detection of BGT has fluids. Chevron shall verify	Photo 2: The BGT has been

Mr. Leonard Lowe New Mexico Oil Conservation Division September 19, 2008 Page 2

	the integrity of the tank. The top of the tank is not adhered to its side wall causing access to its leak detection from external sources. Construct this tank to prevent run off to enter its leak detection system. If the tank has leaked in to the ground Chevron shall submit to the OCD a course of action to resolve this concern. Chevron has 3 months to address this concern.	removed. A five point composite sample was collected and analyzed in the field for Total Petroleum Hydrocarbons using US EPA Method 418.1. The test result was 5,424 ppm. Additional samples will be collected and the site will be remediated.	
4.	Hydrocarbon staining near engine. Chevron shall prevent any unauthorized discharges at their facility; doing so is a direct violation of its Discharge Permit. Chevron shall properly clean up these contaminated soils within 3 months .	Photo 3 and 4: Area has been cleaned.	
5.	The caps for leak detection systems need to be in place at all times other then verification of system. Periodic verification of detection shall be implemented on site and concerns addressed in a timely fashion.	Photo 5: Leak detection system caps have been installed and will be checked.	
6.	Berm the facility to decrease run on and off of water. This will prevent erosion; the possibility of any spills or releases from going off site and creating excess waste from run on commingling with liquids on site.	The facility will be bermed upon completion of the Lateral 2 compressor modification project. Photos will be provided.	
7.	Hydrostatic test all underground pipelines every five years and submit results to the OCD. Review permit conditions for details, condition 12. If test has never been performed Chevron has 3 months to perform tests and send results to the OCD.	Hydrostating testing has been performed and the results will be submitted to OCD in the mail.	

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Regards,

Suzanne Shore

Response to NMOCD Inspection Report (May 7, 2008) Chevron Lateral #2 Compressor Station, GW – 070 September 19, 2008



Photo 1: Facility sign has correct discharge number.



Photo 4: Area has been cleaned.



Photo 2: BGT has been removed.



Photo 5: Cap for leak detection system has been installed.



Photo 3: Area has been cleaned.



8.2008 ATTACHMENT

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ATTACHENENT 2 8.20.08

From:	Shore, Suzanne [shores@chevron.com]
Sent:	Wednesday, August 20, 2008 7:09 AM
То:	Lowe, Leonard, EMNRD
Subject:	RE: Chevron GW 070 Lateral #2 Compressor Station Modification Request
Attachments:	Figure 1 GW 070 Existing Lateral #2 CDP Site Plan.pdf; Figure 2 GW 070 Proposed Lateral #2 CDP Site Plan.pdf

Mr. Lowe,

Thank you for your prompt review. Please contact me if you have any additional comments or questions.

1. The new BGT is composed of carbon steel and has an open top. A metal grating will be installed across the tank opening pursuant to Discharge Permit Approval Conditions 11.C.

2. I apologize for the confusion. There are actually two items to note on Lateral #2 site location.

- 1 The "12' O.D. IN GROUND PRODUCED WATER TANK" shown on Figure 1 GW-070 Existing Lateral #2 Site Plan will be moved (not removed) to the new location designated as "95 BBL IN GROUND PIT TANK" on Figure 2 GW-070 Proposed Lateral #2 Site Plan.
- 1 And the "8' O.D. IN GROUND OILY WATER TANK " shown on Figure 1 is an error. It has been removed. Initial soil sampling of the BGT site has been conducted.

3. The total horsepower will be 630 which is less than our current total of 900 HP.

Regards,

Suzanne Shore Waste and Water Specialist MidContinent/Alaska SBU

Chevron North America Exploration and Production

11111 S. Wilcrest Dr C2304, Houston TX 77099 Tel 281 561 3920 Fax 281 561 3702 <u>shores@chevron.com</u>

From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]
Sent: Friday, August 15, 2008 4:53 PM
To: Shore, Suzanne
Subject: RE: Chevron GW 070 Lateral #2 Compressor Station Modification Request

Suzanne Shore,

I have a few questions:

1. What is the new BGT material composed of?

2. Your letter stated a 95 BBL BGT to be removed. Your current schematic does not identify a 95 BBL BGT, but only two "in ground" tanks (oily water and produced water), therefore which of these two tanks is the 95 BBL tank to be removed? According to your "after modification" schematic, both tanks are gone, what happened? I just

need clarification.

3. The compressor you are replacing will the new one have the same or equivalent horsepower?

I have additional questions, once clarification on the removal of WHICH tank is to be removed.

llowe

Leonard Lowe

Environmental Engineer Oil Conservation Division/EMNRD 1220 S. St. Francis Drive Santa Fe, N.M. 87505 Office: 505-476-3492 Fax: 505-476-3462 E-mail: <u>leonard.lowe@state.nm.us</u> Website: <u>http://www.emnrd.state.nm.us/ocd/</u>

From: Shore, Suzanne [mailto:shores@chevron.com]
Sent: Friday, August 15, 2008 1:00 PM
To: Lowe, Leonard, EMNRD
Subject: Chevron GW 070 Lateral #2 Compressor Station Modification Request

Mr. Lowe,

Please see attached letter and figures describing the planned modifications for below ground tank at our Lateral #2 compressor station covered by GW-070 Permit.

Thank you,

Suzanne Shore Waste and Water Specialist MidContinent/Alaska SBU

Chevron North America Exploration and Production

11111 S. Wilcrest Dr C2304, Houston TX 77099 Tel 281 561 3920 Fax 281 561 3702 <u>shores@chevron.com</u>

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GW-070



AW-070

Chevron

Suzanne Shore Waste and Water Specialist MidContinent/Alaska SBU Chevron North America Exploration and Production Chevron U.S.A. Production Company 11111 S. Wilcrest Dr. Houston, TX 77099 Tel 281-561-3920

August 15, 2008

Mr. Leonard Lowe Oil Conservation Divsion New Mexico Energy, Minerals and Natural Resources Department 1220 South St. Francis Drive Santa Fe, New Mexico 87505

RE: Below Grade Tank Discharge Permit GW-070 Chevron USA Inc. Lateral #2 Compressor Station Rio Arriba County, New Mexico

Dear Mr. Lowe,

Chevron USA Inc. operates the Lateral #2 Compressor Station located in Section 1, Township 26 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. Pursuant to section 11 of the GW-070 Discharge Permit Approval Conditions for below grade tanks, Chevron USA Inc is hereby submitting modification plans to New Mexico Oil Conservation Division for review and approval prior to installation.

In an effort to increase the reliability and efficiency of our operations at the compressor station, we are replacing the current rental compressor with a new compressor owned by Chevron. As part of this effort we will be removing the ninety-five barrel below ground tank currently located in the area shown on Figure 1 GW-070 Existing Lateral #2 Site Plan to the new location shown on Figure 2 GW-070 Proposed Lateral #2 Site Plan according to the tank specifications shown on Figure 3 Standard Below Ground Tank.

Additionally, we have updated our facility schematics to identify the lines flowing into the below ground tank; and installed the cap for the leak detection system. The cap will be in place at all times other than verification of the system. These efforts are in response to the following concerns noted in your Inspection Report dated May 7, 2008 to Mr. Rodney Bailey of Chevron for the site inspection conducted by you on April 21, 2008:

2. *Photo 2: Lines flowing in to this BGT can not be identified.*

5. <u>Photo 6</u>: The caps for leak detection systems need to be in place at all times other than verification of system.

Mr. Leonard Lowe New Mexico Oil Conservation Division August 15, 2008 Page 2

We appreciate your review, as we would like to begin the installation of the below ground tank within the next week. If you have any questions or need additional information to facilitate your review, please contact me.

Regards,

Suzanne Shore

From:	Shore, Suzanne [shores@chevron.com]
Sent:	Friday, August 15, 2008 1:00 PM
То:	Lowe, Leonard, EMNRD
Subject:	Chevron GW 070 Lateral #2 Compressor Station Modification Request
Attachments	: Letter Requesting Updates to Permit GW-070.pdf; Figure 1 GW 070 Existing Lateral #2 CDP Site Plan.pdf; Figure 2 GW 070 Proposed Lateral #2 CDP Site Plan.pdf; Figure 3 Standard Below Ground Tank Drawing.TIF

Mr. Lowe,

Please see attached letter and figures describing the planned modifications for below ground tank at our Lateral #2 compressor station covered by GW-070 Permit.

Thank you,

Suzanne Shore Waste and Water Specialist MidContinent/Alaska SBU

Chevron North America Exploration and Production

11111 S. Wilcrest Dr C2304, Houston TX 77099 Tel 281 561 3920 Fax 281 561 3702 shores@chevron.com

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- From: Lowe, Leonard, EMNRD
- Sent: Thursday, May 08, 2008 2:38 PM
- To: 'Bailey, Rodney G'
- Cc: Powell, Brandon, EMNRD

Subject: RE: Chevron, GW-070 Inspection Report

Mr. Rodney Bailey,

I had forgotten about the Antelope Stipulations.

Your proposed 120 day limit is approved.

Please print and attach this correspondence to the Inspection Letters.

Thank you for your attention.

llowe

Leonard Lowe

Environmental Engineer Oil Conservation Division/EMNRD 1220 S. St. Francis Drive Santa Fe, N.M. 87505 Office: 505-476-3492 Fax: 505-476-3462 E-mail: <u>leonard.lowe@state.nm.us</u> Website: <u>http://www.emnrd.state.nm.us/ocd/</u>

From: Bailey, Rodney G [mailto:bailerg@chevron.com]
Sent: Thursday, May 08, 2008 1:30 PM
To: Lowe, Leonard, EMNRD
Subject: RE: Chevron, GW-070 Inspection Report

Leonard can we talk about the 90 day time frame for completing some of these items? We are planning compressor replacements at Lateral #1 & #2, staring around July 1st and each location and they will take about 30 days each to complete. Also with Antelope Stips through 7-15 we will not be able to move in the heavy equipment that will be needed to remove the tanks and complete some other work on location till after then. With the current 90 day time table in your letter we will only have from July 15th to July 21st. to complete some of the work. Is there anyway we could move the time frame up to 120 days for this work to be complete? Thank you.

Rodney Bailey Waste & Water Team Lead Midland Texas Chevron USA Office - 432-687-7123 Cell - 432-894-3519 Fax - 866-569-5650 bailerg@chevron.com

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From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]
Sent: Wednesday, May 07, 2008 10:13 AM
To: Bailey, Rodney G; Archer, Michael; Estes, David; Strickland, Terry (TEDS)
Cc: Price, Wayne, EMNRD; Powell, Brandon, EMNRD
Subject: Chevron, GW-070 Inspection Report

Chevron,

Please review inspection report.

Thank you again for the walk through of your facility.

llowe

Leonard Lowe

Environmental Engineer Oil Conservation Division/EMNRD 1220 S. St. Francis Drive Santa Fe, N.M. 87505 Office: 505-476-3492 Fax: 505-476-3462 E-mail: leonard.lowe@state.nm.us Website: http://www.emnrd.state.nm.us/ocd/

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From:	Lowe, Leonard, EMNRD
Sent:	Wednesday, May 07, 2008 9:13 AM
То:	'Bailey, Rodney G'; 'Archer, Michael'; David Estes; Terry Strickland
Cc:	Price, Wayne, EMNRD; Powell, Brandon, EMNRD
Subject:	Chevron, GW-070 Inspection Report
Attachments:	GW-070, Inspection Letter.doc; GW-070, Photo Rprt.doc

Chevron,

Please review inspection report.

Thank you again for the walk through of your facility.

llowe

Leonard Lowe

Environmental Engineer Oil Conservation Division/EMNRD 1220 S. St. Francis Drive Santa Fe, N.M. 87505 Office: 505-476-3492 Fax: 505-476-3462 E-mail: leonard.lowe@state.nm.us Website: http://www.emnrd.state.nm.us/ocd/ New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson Governor Joanna Prukop Cabinet Secretary Reese Fullerton Deputy Cabinet Secretary

Mark Fesmire Division Director Oil Conservation Division



May 7th, 2008

Mr. Rodney Bailey

Re: Inspection Report, GW-070 Chevron, Lateral # 2 Compressor Station Rio Arriba County, New Mexico

Dear Mr. Bailey:

The Oil Conservation Division (OCD) performed an onsite inspection of Chevron's Lateral # 2 CDP compressor station located in Section 26, Township 27 North, Range 7 West, NMPM, Rio Arriba County, New Mexico on Monday, April 21, 2008.

Chevron shall address the following concerns, reference photos in attachment:

- 1. <u>Photo 1</u>: Site facility sign denotes incorrect Discharge Plan number; it should be GW-070. Chevron has **3 months** to correct this.
- 2. <u>Photo 2</u>: Lines flowing in to this BGT can not be identified. Chevron has **3 months** identify these lines and annotate in on their facility schematic and submit to the OCD.
- 3. <u>Photo 3 & 4</u>: The leak detection of BGT has fluids. Chevron shall verify the integrity of the tank. The top of the tank is not adhered to its side wall causing access to its leak detection from external sources. Construct this tank to prevent run off to enter its leak detection system. If the tank has leaked in to the ground Chevron shall submit to the OCD a course of action to resolve this concern. Chevron has **3 months** to address this concern.
- 4. <u>Photo 5</u>: Hydrocarbon staining near engine. Chevron shall prevent any unauthorized discharges at their facility; doing so is a direct violation of its Discharge Permit. Chevron shall properly clean up these contaminated soils within **3 months**.
- 5. <u>Photo 6</u>: The caps for leak detection systems need to be in place at all times other then verification of system. Periodic verification of detection shall be implemented on site and concerns addressed in a timely fashion.
- 6. <u>No photo</u>: Berm the facility to decrease run on and off of water. This will prevent erosion; the possibility of any spills or releases from going off site and creating excess waste from run on commingling with liquids on site.
- 7. <u>No photo</u>: Hydrostatic test all underground pipelines every five years and submit results to the OCD. Review permit conditions for details, condition 12. If test has never been performed Chevron has **3 months** to perform tests and send results to the OCD.

Chevron shall submit to the OCD a report with photographs, where applicable, for each of these findings within their prescribed time. If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3492 or <u>leonard.lowe@state.nm.us</u>.



Mr. Rodney Bailey May 7, 2008 Page 2

Sincerely,

nal

Leonard Lowe Environmental Engineer

xc: OCD District III Office, Aztec

OCD Inspection Chevron Lat # 2, GW - 070

Inspectors: Brandon Powell and Leonard Lowe Company Rep: Rodney Bailey, Michael Archer and Dave Estes Time: 11:50 – 12:20

Date: 04.21.08



<u>Photo 1</u>: Facility posted sign notes incorrect GW number, should be GW-070, not GW-082.



<u>Photo 2</u>: Lines feeding in to BGT is questionable. Unidentified source.



<u>Photo 3</u>: BGT leak detection system is full of fluids.



<u>Photo 4</u>: Integrity of second wall on BGT is compromised. Upper lip is not secured to side walls.



<u>Photo 5</u>: Hydrocarbon staining around engine.



<u>Photo 6</u>: Leak detection lid is missing on BGT.

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