GW - 244

INSPECTION

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD

Sent: Monday, October 20, 2008 2:52 PM

To: 'Shore, Suzanne'

Subject: RE: Berm around Lateral 4 site, GW -244

Approved.

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: Thursday, September 25, 2008 2:55 PM
To: Lowe, Leonard, EMNRD
Subject: Berm around Lateral 4 site, GW -244

Mr. Lowe,

On April 21, 2008 during the inspection of our Lateral 4 Compressor Station which is covered under GW-244 discharge permit, you requested that the facility be bermed to decrease run on and off of water. The northwest corner of the lateral 4 area is much lower than the other elevated parts of the facility making it difficult to berm; therefore we'd like to install the berm as shown in the attached schematic. As you can see in the attached photos, there are not any below or above grounds tanks or other large pieces of equipment with fluids that would potentially result in any contamination in this area of the facility. Pictured in the area are gas pipelines. We believe the proposed berm configuration would still meet the objective of decreasing water run on and off from the area that has potential pollutants.

If you need additional information, please contact me or David Estes at (505) 320-3201.

Thank you,

Suzanne Shore Waste and Water Specialist MidContinent/Alaska SBU

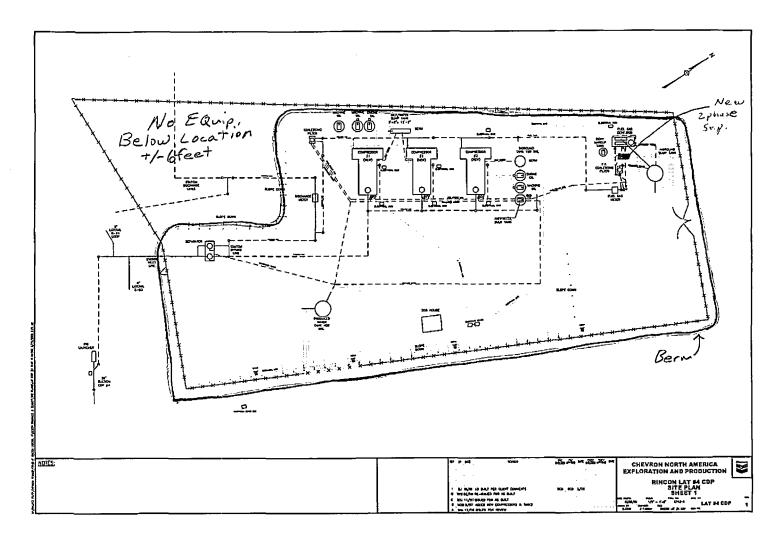
Chevron North America Exploration and Production

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

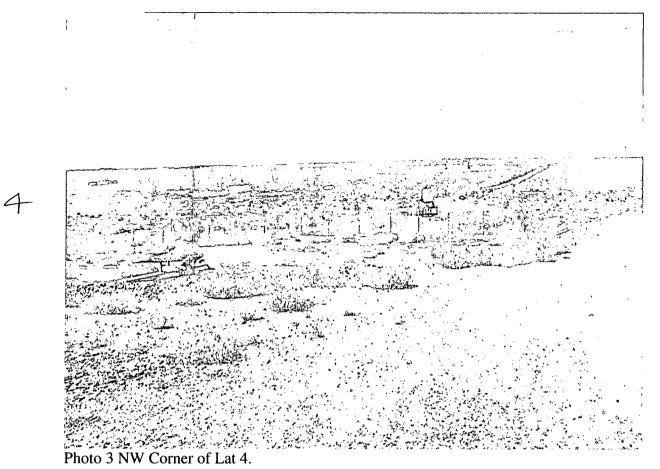
This inbound email has been scanned by the MessageLabs Email Security System.

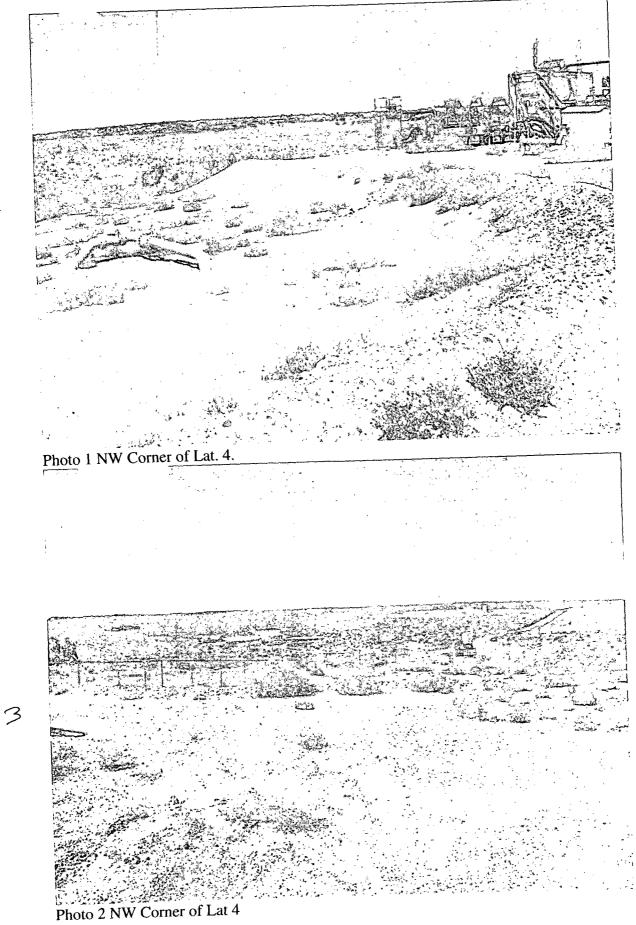
Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient (s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.

lof 4 attachnunts



- - - '_____





Page 1 of **#** 1

Y

of e-marl + 5 Page Atlachment

Lowe, Leonard, EMNRD

| From: | Shore, Suzanne [shores@chevron.com] |
|-------------|---|
| Sent: | Thursday, September 25, 2008 1:19 PM |
| То: | Lowe, Leonard, EMNRD |
| Subject: | GW-244 Inspection Finding 1 - BGT Closure |
| Attachmente | CW 244 Lateral & Compressor Station BGT Bit Closure ndf |

Attachments: GW-244 Lateral 4 Compressor Station BG1 Pit Closure.pdf

Mr. Lowe,

1

.

Attached is a copy of the letter and associated forms and documents submitted by Mr. Mike Archer for Finding 1. If needed, I can provide a copy which shows Mike's signature, upon his return from vacation the week of October 6th.

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

From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]
Sent: Thursday, September 25, 2008 10:48 AM
To: Shore, Suzanne
Subject: RE: Chevron response to inspection of GW-244

Suzanne,

Thank you for the response.

A few requests:

Please forward to me a copy of the BGT closure information that was sent to Brandon for Finding 1.

The following item will still be open until all information is submitted to the OCD

1. Finding 6: photos of completed berms

Thank you,

llowe

Leonard Lowe

Environmental Engineer Oil Conservation Division/EMNRD 1220 S. St. Francis Drive Santa Fe, N.M. 87505

10/20/2008

Michael W. Archer Health, Environmental and Safety Specialist Chevron North America P.O. Box 730 Aztec, NM 87410 Project No. 92270-0254

Phone: (505) 326-2657 ext. 112 Cell: (505) 320-7970

May 20, 2008

Mr. Brandon Powell New Mexico Oil Conservation Division 1000 Rio Bravo Aztec, NM 87410

Phone: (505) 334-6178 ext. 15

RE: SOIL SAMPLING OF A BGT LOCATED AT THE RINCON LATERAL #4 CDP, RIO ARRIBA COUNTY, NEW MEXICO

Dear Mr. Powell,

Envirotech has completed soil sampling of a lined pit located at the Rincon Lateral #4 CDP, Rio Arriba County, New Mexico. Attached to this letter are the field analysis and the C-144 pit closure documentation.

The site was ranked according to the NMOCD/BLM guidance for unlined surface impoundments. The site was ranked as a 1000 ppm closure for Total Petroleum Hydrocarbons (TPH) and was screened for organic vapors using a Photo-Ionization Detector (PID). One (1) sample was collected from directly below the BGT at sandstone. The sample was below the 1000 ppm TPH standard at 284 ppm and was also below the 100 ppm standard for organic vapors.

This BGT was closed and Envirotech recommends no further action with regards to this tank at this site. If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Michael W. Archer Chevron North America Exploration & Production Company

Enclosures: C-144, Field Notes, Analytical Results

District I 1625 N. French Dr., Hobbs, NM 88240 <u>District II</u> 1301 W. Grand Avenue, Artesia, NM 88210 <u>District III</u> 1000 Rio Brazos Road, Aztec, NM 87410 <u>District IV</u> 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-144 June 1, 2004

For drilling and production facilities, submit to appropriate NMOCD District Office. For downstream facilities, submit to Santa Fe office

| Pit or Below-Grade Tank Registration or Closure Is pit or below-grade tank covered by a "general plan"? Yes 🖾 No 🗍 Type of action: Registration of a pit or below-grade tank 🗋 Closure of a pit or below-grade tank 🖄 | | | |
|---|---|----------------------------|--|
| | | MArcher@chevron.com | |
| Address: 322 County Road 3100, Aztec, NM 87410 | | | |
| Facility or well name: <u>Rincon Lateral #4 CDP</u> API #: | U/L or Qtr/Qtr <u>M</u> Sec _ | <u>30 T 27 N R 6W</u> | |
| County: Rio Arriba Latitude | <u>36° 32.406' N</u> Longitude <u>107° 30</u> | .870' W NAD: 1927 🛛 1983 🗍 | |
| Surface Owner: Federal 🖾 State 🗋 Private 🗍 Indian 🗌 | | | |
| Pit | Below-grade tank | | |
| Type: Drilling 🗌 Production 🗋 Disposal 🗍 | Volume: <u>70</u> bbl Type of fluid: | | |
| Workover 🔲 Emergency 🗌 | Construction material: Steel | | |
| Lined 🔲 Unlined 🗌 | Double-walled, with leak detection? Yes 🗍 If no | ot, explain why not. | |
| Liner type: Synthetic 🗌 Thickness Clay 🔲 | No. Tank installed prior to Rule 50. | | |
| Pit Volumebbl | | | |
| Depth to ground water (vertical distance from bottom of pit to seasonal | Less than 50 feet | (20 points) | |
| high water elevation of ground water.) | 50 feet or more, but less than 100 feet | (10 points) | |
| high water elevation of ground water.) | 100 feet or more | (0 points) 0 | |
| Wellhead protection area: (Less than 200 feet from a private domestic | Yes | (20 points) | |
| water source, or less than 1000 feet from all other water sources.) | No | (0 points) 0 | |
| | Less than 200 feet | | |
| Distance to surface water: (horizontal distance to all wetlands, playas, | | (20 points) | |
| irrigation canals, ditches, and perennial and ephemeral watercourses.) | | | |
| | 1000 feet or more | (0 points) 10 | |
| | Ranking Score (Total Points) | 10 | |

<u>f this is a pit closure:</u> (1) Attach a diagram of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: (check the onsite box if our are burying in place) onsite \Box offsite \Box If offsite, name of facility ____. (3) Attach a general description of remedial action taken including remediation start date and end late. (4) Groundwater encountered: No \boxtimes Yes \Box If yes, show depth below ground surface ______ft. and attach sample results.

5) Attach soil sample results and a diagram of sample locations and excavations.

Additional Comments:

Soil passed TPH standard of 1000 ppm using USEPA Method 418.1 and the 100 ppm OVM standard. No excavation needed.

I hereby certify that the information above is true and complete to the best of my knowledge and belief. I further certify that the above-described pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines [], a general permit [], or an (attached) alternative OCD-approved plan [].

Date:

Printed Name/Title Mr. Michael W. Archer - HES Specialist Signature

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations.

Approval: Printed Name/Title ______ Signature _____

___ Date: ____

| CLIENT, Churra | | EN | IVIROTE | CH INC. | | LD | CATION | ND: | |
|--|---|---|--|--|--------------------------------|-----------------|-----------------------------------|--|------|
| | | 51 FAR | MENTAL SCIENTI 796 U.S. HIGHW MINGTON, NEW PHONE: (505) (| WAY 64-3014 MEXICO 67401 | 5 | | | ND: | |
| FIELD REP | ORT: | CLOSU | URE ' | VERIFI | CATIO | N Pag | E No: - | | 1 |
| OCATION: <u>NAME: U.S.</u> QUAD/UNIT: III S QTR/EDITAGE: GIH | ec: 30 TW | P:ZAM RN | | | 90,661 424-6 1774: RA ST: M | UM DATE | STARTED: FINISHED: ONMENTAL | <u>Heston</u> Hactor Guez | |
| EXCAVATION APPROX. DISPOSAL FACILITY: LAND USE: | NA | LEAS | SE: | REMEDIAT | TION MET | 'HOD: FORMAT | <u>r//A</u> ion: <u>n</u> | ĮA | |
| ELD NOTES & REI | <u>MARKS:</u>] f <u>>160 </u> neai | PIT LOCATE | D APPROX | (IMATELY _ >1,200 | NEAREST SUR | FACE VAT | F'RON ERI <u></u> | 1 WEEEHE - 100 0 | ăad. |
| | | | | | | <u></u> | | | 1 |
| | | | IRE STD | 050 PPM | - | <u>×</u> pit | | | LED |
| B' phe & hyf | TION DESC | | | - | - | <u>×</u> pit | ABANDO | NED | LED |
| B' phe & hyf | TION DESC | | | - | | <u>×</u> pit | ABANDO | NED | ED |
| B' phe & hyf | <u>TION DES(</u> . Start to | <u>CRIPTION</u> m.L. Direct ky | be <i>law</i> FIE | B G ELD 418.1 CA | L- | × PIT | ABANDO EL TANK | NED INSTALI | |
| SCALE | TION DESI Stall to Lonfored TIME 1530 | Dired by SAMPLE 1.D | belaw FIE LAB No: | B GT ELD 418.1 CA WEIGHT (9) | ALCULATIONS | × PIT STEE | ABANDO EL TANK READING | NED INSTALI CALC. pp 19 G | |
| SCALE O FT | TION DESC Stact to Lontoved TIME 1530 1620 | Dired by | belaw FIE LAB No: | B G ELD 418.1 CA WEIGHT (9) | LCULATIONS | × PIT STEE | ABANDO EL TANK READING | VED INSTALI CALC. pp 19 G 28 4 | |
| SCALE | TION DESC Stact to Lontoved TIME 1530 1620 | Dired by SAMPLE 1.D | FIE LAB No: OVM RESULT | B G ELD 418.1 C/ WEIGHT (9) Sto TS | LCULATIONS | × PIT STEE | ABANDO EL TANK READING | VED INSTALI CALC. pp 19 G 28 4 | |
| SCALE O FT | TION DESC Stact to Lontoved TIME 1530 1620 | Dired by SAMPLE 1.D 200 STO 6 635 | Esultan FIE LAB No: OVM RESULT PUE FEEP | B GT ELD 418.1 CA WEIGHT (9) STO IS HEADSPACE 0 (ppm) 2 | LCULATIONS | × PIT STEE | ABANDO EL TANK READING | VED INSTALI CALC. pp 19 G 28 4 | |
| SCALE O FT | TION DESC Stact to Lontoved TIME 1530 1620 | CRIPTION The Contract of the | Delaw FIE LAB No: OVM RESULT DE FED C. 6 | B G ELD 418.1 C/ WEIGHT (9) SCO TS HEADSPACE (0) CPPM) CO LES | LCULATIONS | V PIT STEE | ABANDO EL TANK READING | VED INSTALI | |

ı

ENVIROTECH INC.

EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

| Client: | Chevron Production | Project #: | 92270-0254 |
|----------------|--------------------|------------------|------------|
| Sample No.: | 1 | Date Reported: | 5/5/2008 |
| Sample ID: | Bottom 6' BGS | Date Sampled: | 4/28/2008 |
| Sample Matrix: | Soil | Date Analyzed: | 4/28/2008 |
| Preservative: | Cool | Analysis Needed: | TPH-418.1 |
| Condition: | Cool and Intact | | |

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

Total Petroleum Hydrocarbons2845.0

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 # 4 CDP

Instrument calibrated to 200 ppm standard. Zeroed before each sample

Analyst

| Greg | Crabtree | |
|---------|----------|--|
| Printed | | |

Nicole Hayworth Printed

ENVIROTECH

CONTINUOUS CALIBRATION EPA METHOD 418.1 TOTAL PETROLEUM **HYDROCARBONS**

Cal. Date: 28-Apr-08 Standard Concentration Concentration Reading Parameter mg/L mg/L TPH 100 200 190 500 1000

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

Analyst

05/10/08 Date

Greg Crabtree Printed

Review

Nicole Hayworth Printed

Date

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD

Sent: Thursday, September 25, 2008 9:48 AM

To: 'Shore, Suzanne'

Subject: RE: Chevron response to inspection of GW-244

Suzanne,

1

Thank you for the response.

A few requests:

Please forward to me a copy of the BGT closure information that was sent to Brandon for Finding 1.

The following item will still be open until all information is submitted to the OCD

1. Finding 6: photos of completed berms

Thank you,

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, September 19, 2008 3:38 PM
To: Shore, Suzanne; Lowe, Leonard, EMNRD
Cc: Bailey, Rodney G; Powell, Brandon, EMNRD; Price, Wayne, EMNRD
Subject: Chevron response to inspection of GW-244

Mr. Lowe,

Attached is Chevron's response to the inspection of our Lateral #4 Compressor Station covered by GW-244 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 shores@chevron.com

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 shores@chevron.com

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."?

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>

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient (s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.

This inbound email has been scanned by the MessageLabs Email Security System.

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

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-244 Chevron USA Inc. Lateral #4 Compressor Station Rio Arriba County, New Mexico

Dear Mr. Lowe,

Chevron USA Inc. operates the Lateral #4 Compressor Station located in Section 30, Township 27 North, Range 6 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.

| Finding | Description Inspection Report (May 7, 2008) | Action |
|---------|--|------------------------------|
| 1. | Below-grade tank has liquids in its leak detection system. | Photo 1: This below grade |
| | The tank is on Chevron permitted property and is | tank was removed. Soil |
| | therefore liable for the tank. Chevron shall verify the | sampling did not reveal |
| | integrity of the tank. If there was a breach in the | contamination above |
| | secondary detection system then Chevron shall submit to | thresholds. BGT closure |
| 1 | the OCD a plan of action for clean up this tank. Chevron | information submitted to Mr. |
| | has six months to comply with this issue. | Brandon Powell on May 20, |
| | | 2008 from Mr. Mike Archer of |
| | | Chevron. |
| 2. | Label the condensate tank. Chevron has three months to | Photo 2: Condensate tank has |
| | resolve this issue. | been labeled. |
| | | |
| 3. | Saddle tank hose extrudes beyond the secondary catch | Photo 3: A larger secondary |

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

| | containment area. Chevron shall reconfigure this within three months. | containment catchment area has been installed to accommodate all equipment. |
|----|--|---|
| 4. | The caps for these below-grade tank sumps are not in place. Chevron shall ensure that facility personnel inspect these areas when on site and maintain a log of these inspections. Keep caps in place when not being inspected. | Photos 4, 5 & 6: Caps are in place. |
| 5. | These new BGT's are not depicted on Chevron's schematic for the facility. The lube saddle tanks are not located where the schematics indicate. Please submit to the OCD a new schematic of the Lateral # 4 station. Chevron must keep the OCD informed on facility changes, review permit conditions. | A new schematic of the Lateral #4 station will be provided upon completion of the berm installation. |
| 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. | Berm is currently being added. Photos will be provided upon completion. |
| | Bulging Lube Tank (Photo 6 in inspection report) | Photo 7: Tank has been replaced. |

ï

5

Regards,

Suzanne Shore

Response to NMOCD Inspection Report (May 7, 2008) Chevron Lateral #4 Compressor Station, GW – 244 September 19, 2008

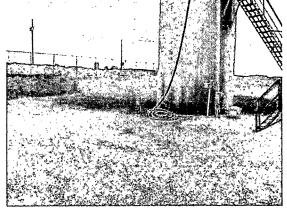


Photo 1: Below -grade tank has been removed.

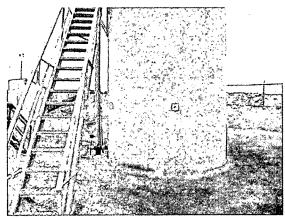


Photo 2: Condensate tank has been labeled.

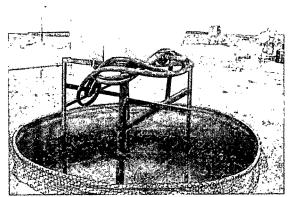


Photo 3: Installed larger secondary catch containment area.

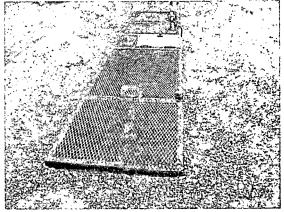


Photo 4: Cap for leak detection system is in place.

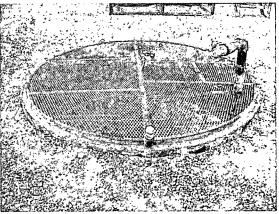


Photo 5: Cap for leak detection system is in place.

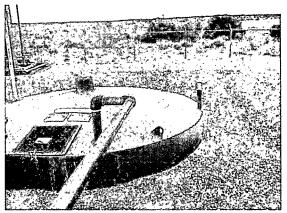


Photo 6: Cap for leak detection system is in place.

Response to NMOCD Inspection Report (May 7, 2008) Chevron Lateral #4 Compressor Station, GW – 244 September 19, 2008

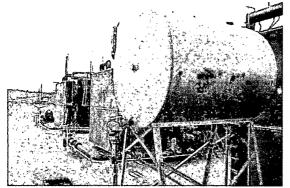


Photo 7: Replaced oil tank.

Lowe, Leonard, EMNRD

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: http://www.emnrd.state.nm.us/ocd/

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

This message may contain confidential information that is legally privileged, and is intended only for the use of the parties to whom it is addressed. If you are not an intended recipient, you are hereby notified that any disclosure,

5/8/2008

copying, distribution or use of any information in this message is strictly prohibited. If you have received this message in error, please notify me at 432-687-7123 or by e-Mail. Thank you

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: <u>leonard.lowe@state.nm.us</u> Website: <u>http://www.emnrd.state.nm.us/ocd/</u>

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient (s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.

This inbound email has been scanned by the MessageLabs Email Security System.

Lowe, Leonard, EMNRD

| 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-244 Inspection Report |
| Attachments | : GW-244, Inspection Letter.doc; GW-244 Insp. photos.doc |

Chevron,

.

١.

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/



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-244 Chevron, Lateral # 4 Compressor Station Rio Arriba County, New Mexico

Dear Mr. Bailey:

The Oil Conservation Division (OCD) performed an onsite inspection of Chevron's Lateral # 4 CDP compressor station located in Section 30, Township 27 North, Range 6 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 3</u>: Below-grade tank has liquids in its leak detection system. The tank is on Chevron permitted property and is therefore liable for the tank. Chevron shall verify the integrity of the tank. If there was a breach in the secondary detection system then Chevron shall submit to the OCD a plan of action for clean up this tank. Chevron has **six months** to comply with this issue.
- 2. <u>Photo 4-5</u>: Label the condensate tank. Chevron has **three months** to resolve this issue.
- 3. <u>Photo 7</u>: Saddle tank hose extrudes beyond the secondary catch containment area. Chevron shall reconfigure this within **three months**.
- 4. <u>Photo 8 10</u>: The caps for these below-grade tank sumps are not in place. Chevron shall ensure that facility personnel inspect these areas when on site and maintain a log of these inspections. Keep caps in place when not being inspected.
- 5. <u>Photo 8 9</u>: These new BGT's are not depicted on Chevron's schematic for the facility. The lube saddle tanks are not located where the schematics indicate. Please submit to the OCD a new schematic of the Lateral # 4 station. Chevron must keep the OCD informed on facility changes, review permit conditions.
- 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.

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 leonard.lowe@state.nm.us.



Mr. Rodney Bailey May 7, 2008 Page 2

Sincerely,

nal

Leonard Lowe Environmental Engineer

xc: OCD District III Office, Aztec

OCD Inspection Chevron Lat # 4, GW - 244 Inspectors: Brandon Powell and Leonard Lowe Company Rep: Rodney Bailey, Michael Archer and Dave Estes

Date: 04.21.08

Time: 10:40 - 11:40

Image 1: Chevron is unaware of who owns this BGT.



Image 2: Leak detection of questionable BGT has fluids.



Image 3: Close of fluids, appears to be to capacity.



Image 4: Condensate tank belongs to Chevron, liquids belong to Enterprise.

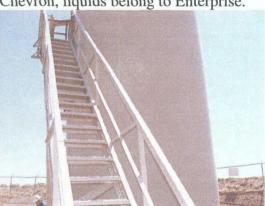


Image 5: Condensate tank is not labeled.



Image 6: Lube tank is bulged.

Page 1

OCD Inspection Chevron Lat # 4, GW - 244 Inspectors: Brandon Powell and Leonard Lowe Company Rep: Rodney Bailey, Michael Archer and Dave Estes Time: 10:40 - 11:40

Date: 04.21.08



<u>Image 7</u>: Reconfigure extruding plumbing of saddle tank to prevent discharge on to ground of hose.



Image 8: Below grade catch tank is not identified on Lat. # 4 lay out schematic. The cap for the leak detector appears to be missing.



<u>Image 9</u>: Cap is missing and not in place of leak detection BGT.



<u>Image 10</u>: Leak detection cap missing on sump located near entrance of facility.

Page 2