2R - 58

GENERAL CORRESPONDENCE

YEAR(S): 2006

Hansen, Edward J., EMNRD

From:

Price, Wayne, EMNRD

Sent:

Friday, December 15, 2006 4:31 PM

To:

Hansen, Edward J., EMNRD

Cc:

Lowe, Leonard, EMNRD

Subject:

FW: Chevron Catclaw Draw #21 C-144 Alternative Closure Revised

2R0058

Attachments: Catclaw Draw #21 C-144 Alternative Closure Revised.pdf

Please file

From: Pat Mccasland [mailto:pmccasland@envplus.net]

Sent: Tuesday, December 12, 2006 3:40 PM

To: Price, Wayne, EMNRD

Cc: Bratcher, Mike, EMNRD; Jim Duke; Wayne Minchew; 'Cody Miller'; Cody Miller; Daniel Dominguez (EPI); Dave Duncan (EPI);

'EPI'; Janet Peterson; 'Jason Stegemoller'; Jessica Harper (EPI); 'Roger Boone' **Subject:** Chevron Catclaw Draw #21 C-144 Alternative Closure Revised

Mr. Price.

Attached is the <u>Chevron Catclaw Draw #21 C-144 Alternative Closure Revised</u>, being submitted by Environmental Plus, Inc. (EPI) on behalf of Chevron. The C-144 proposes an alternative closure strategy that relies on disposal to minimize the volume of the chloride source term and permanent isolation of the remaining chloride source term via encapsulation inside impermeable barriers. Hard copies will follow.

This proposal will be implemented upon your approval.

Sincerely,

Pat McCasland Senior Consultant & Safety Director HydroTech Services, LLC and Environmental Plus, Inc. P.O. Box 1558 2100 Avenue O Eunice, New Mexico 88231

Office: Cellular: 505.394.3481 505.390.7864

FAX:

505.394.2601

eddress:

pmccasland@envplus.net



December 12, 2006

Mr. Wayne Price, Cheif
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division Environmental Bureau
P. O. Box 6429
1220 S St. Francis Drive
Santa Fe, New Mexico 87505

Re: C-144 – Alternative Closure Proposal (Revised)

Chevron USA (O-Grid #4323)

Pure Resources (O-Grid #150628) Catclaw Draw Unit #21 (Ref. #200078) UL-C, Section 14, Township 21 South, Range 25 East, Eddy County, New Mexico Latitude: N 32°29'05.59" and Longitude: W 104°22'08.83"

Dear Mr. Price:

Environmental Plus, Inc. (EPI), on behalf of Chevron USA (Chevron) (Pure Resources) submits the enclosed New Mexico Oil Conservation Division (NMOCD) form C-144 and supporting information proposing an alternative closure at this site. The alternative closure proposes encapsulating the intact pit in place even though the bottom of the pit will be less than 50-feet from the groundwater, (i.e., the bottom of the existing pit is approximately 48-feet from the groundwater interface).

BACKGROUND

Initially, Chevron proposed closing the drill pit via encapsulation in accordance with the NMOCD Pit and Below-Grade Tank Guidelines, November 1, 2004 and the "ChevronTexaco Drilling and Reserve Pit Closure General Plan, December 2004" and was based on the following discussion and rationale.

The Chevron groundwater contour map indicates the groundwater underlying the Catclaw Draw #21 drill pit to be less than 50-feet bgs, however, after review of available water level information from the USGS and the New Mexico Office of the State Engineer (reference $Table\ 1$), the depth to groundwater at the site is calculated to be approximately 56-feet bgs and was derived as follows. The nearest water well to the Catclaw Draw #21 well site is down-gradient approximately 1,400-feet to the north northeast and has a 1992 USGS water level measurement of 34-feet below ground surface (bgs). On July 28, 2006, the groundwater level in this well was measured to be 35.0-feet bgs. The surface elevation of the windmill, as extrapolated from the USGS topographical map, is approximately 3,278-feet amsl. The calculated groundwater table elevation is 3,244-feet amsl, (i.e., 3,278 – 34 = 3,244). The surface elevation at the Catclaw Draw #21 well site, as extrapolated from the USGS topographical map, is 3,300-feet amsl. Reasonably assuming that the groundwater



table elevation under the well site is also 3,244-feet amsl, the calculated depth to groundwater is 56-feet amsl.

Mr. Van Barton, Compliance Officer, NMOCD Artesia Field Office, said that he would grant approval of the encapsulation proposal if the bottom of the pit was greater than 50-feet from groundwater. However, because the pit is approximately 8-feet deep and the groundwater is approximately 56-feet below the land surface where the drill pit was constructed, the bottom of the encapsulated pit is only 48-feet from the groundwater, negating local NMOCD approval. Mr. Barton said that encapsulation proposals of pits less than 50-feet from groundwater could be submitted to the Santa Fe office of the NMOCD for consideration and approved, if deemed technically acceptable. Mr. Wayne Price, NMOCD Santa Fe office, said that he could possibly approve the alternative closure proposal if the pit liner was intact and fluids had not been released from the pit, as evidenced by analysis of soil samples collected from perimeter locations adjacent to the pit at 4-feet to 8-feet bgs. Subsequently, on July 28, 2006, after timely notification of the Artesia and Santa Fe NMOCD offices, samples of the soil from the perimeter locations adjacent to the pit were collected and submitted to the laboratory for analysis. The laboratory reports are attached and the results summarized in *Table 2*.

PIT PERIMETER SAMPLES ANALYTICAL RESULTS

According to the analytical results, benzene, toluene, ethylbenzene and total xylenes (BTEX) and total petroleum hydrocarbon (TPH) are not an issue inside or outside the pit. Chloride results from analysis of the east perimeter, west perimeter and the north perimeter soil samples collected from 6-feet to 8-feet bgs were less than 250 mg/Kg. The chloride concentration in the south perimeter sample collected from 6-feet to 8-feet bgs beneath the caliche well pad was 864 mg/Kg and probably resulted from well pad activities rather than being from the pit. It can be concluded from the analytical results from the perimeter samples that the pit did not over-flow.

NORTH PIT SAMPLE ANALYTICAL RESULTS

A soil sample was collected from an unlined but fenced surface depression north of the lined drill pit to delineate/verify possible drilling fluid impact. Total petroleum hydrocarbon and benzene, toluene, ethylbenzene and total xylenes (BTEX) were not detected above the respective method detection limits. The chloride concentration was 1,280 mg/Kg. Given that the chloride concentration of the stiffened pit contents is 42,000 mg/Kg, it is not reasonable to conclude that the chloride residual in the north pit emanated from the drill pit, but will require remediation.

ALTERNATIVE CLOSURE PROPOSAL REQUEST

Given that the pit liner is intact and the laboratory results from analysis of the soil samples collected from locations adjacent to the perimeter of the pit support the conclusion that the pit did not over-flow into the surrounding environment, it is proposed that a geotextile cushion be installed in the west part of the lined pit to ensure the integrity of the under liner, that the stiffened pit contents be evenly distributed over the pit and that a 20-mil reinforced polyethylene liner, cushioned above and below with geotextile, be installed over the stiffened pit contents. The pit will then be brought to grade with local soil/rock and the surface reseeded with the desires of the landowner. It is furthermore proposed that the impacted soils in the north pit be placed in the pit and encapsulated along with the drill pit contents and the excavated are tested to verify achievement of the NMOCD remedial goals. Additionally, in the event of a liner failure,



to minimize the chloride source term that could potentially migrate to groundwater, approximately 50% of the stiffened drill pit volume will be disposed of off-site, (i.e., approximately 600 cubic yards). A final C-144 and supporting documentation will be submitted to the NMOCD upon completion of the project.

This proposal will be implemented upon approval by the NMOCD and consensus with the New Mexico State Land Office.

Please direct all official communications to:

Chevron USA Jim Duke, Construction Representative PO Box 1949 Eunice, New Mexico 88231

Telephone: 505.394.1237 Email: LDuk@chevron.com

Should you have any questions or concerns, please call me at (505) 394-3481 or Mr. Jim Duke at (505) 394-1237 or via e-mail at <u>LDuk@chevron.com</u>.

Sincerely,

ENVIRONMENTAL PLUS, INC.

Pat McCasland

Senior Environmental Consultant

cc: Mike Bratcher, NMOCD Artesia

Jim Duke, Chevron USA

Wayne Minchew, Chevron USA

Thaddeus Kostrubala, State of New Mexico

file

Enclosures: Topographical Map

Site Location Map

Site Map

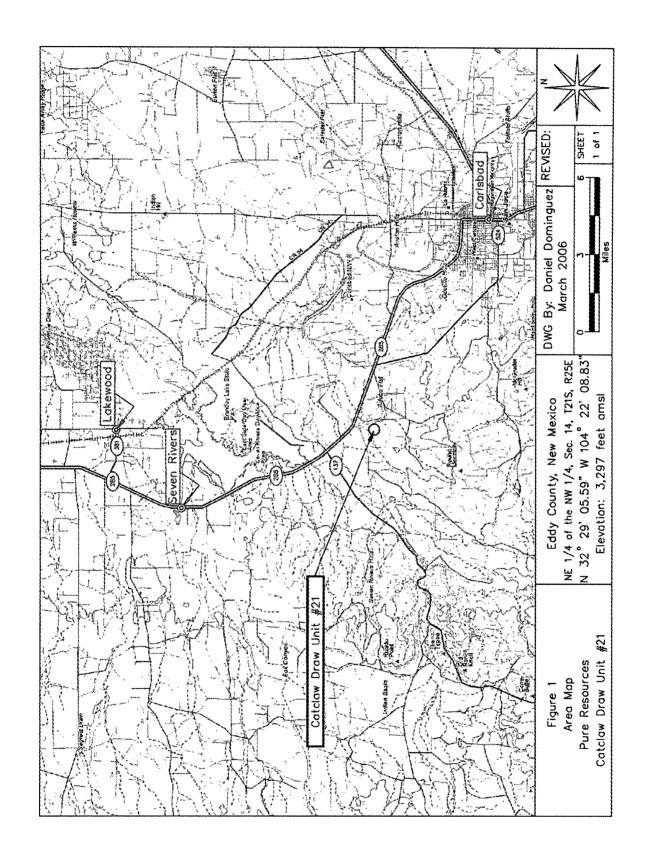
Groundwater Map Table 1 - Well Data

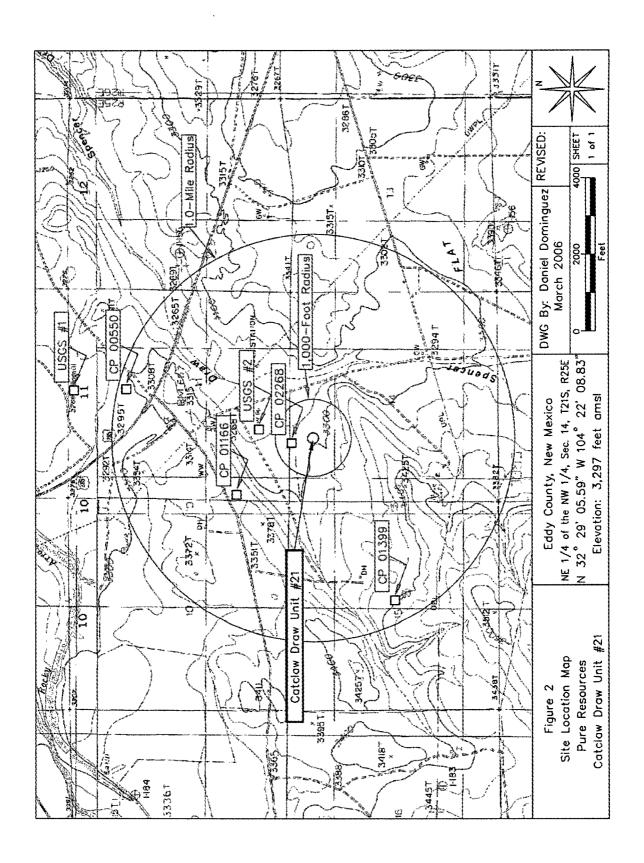
Table 2 - Analytical Results Summary

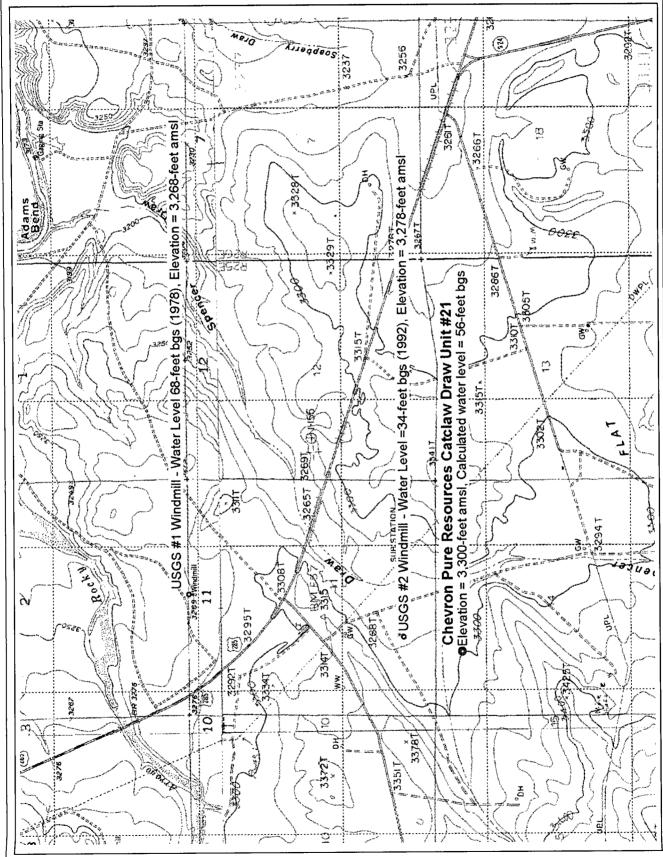
Laboratory Reports

Photographs

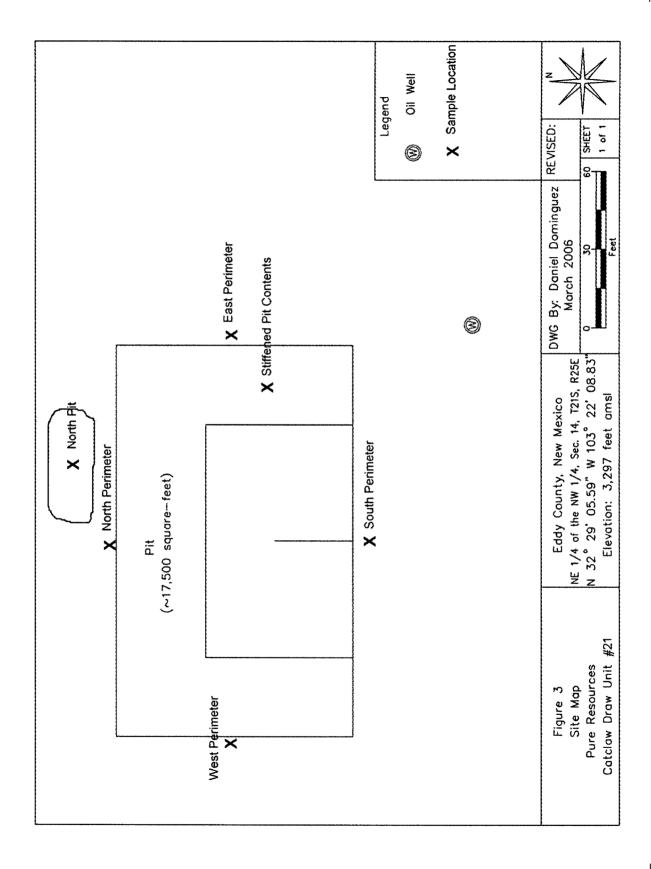
NMOCD Form C-144





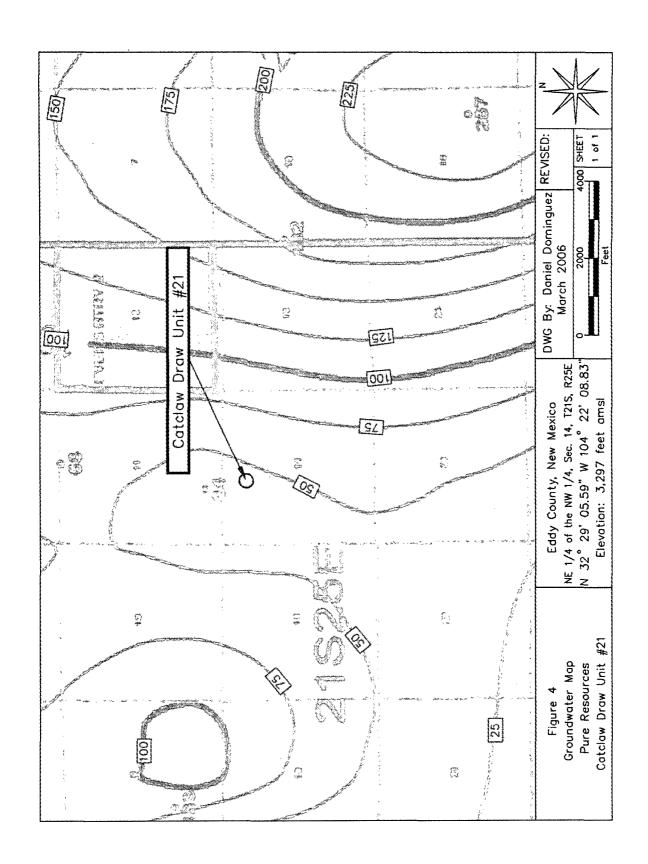


Pure Resources Catclaw Draw Unit #21 200078



200078







WELL INFORMATION REPORT*

Pure Resources Catclaw Draw Unit #21 - Ref #200078

3 WILL TRUITT STK 21S 25E 11 211 N32° 29' 53.01" W104° 21' 54.62" 3 WILMA D. TRUITT PRO 21S 25E 11 3.1 N32° 29' 25.22" W104° 22' 25.95" 0 WILMA D. TRUITT STK 21S 25E 11 3.41 N32° 29' 11.43" W104° 22' 57.13" 3 MORAN OIL P.& D. CORP. PRO 21S 25E 15 2.33 N32° 28' 45.23" W104° 22' 57.13" 21S 25E 11 2.11 21S 25E 11 3.43 N32° 28' 45.23" W104° 22' 57.13" 21S 25E 11 3.43 N32° 27' 26.37" W104° 23' 28.16"	Well Number	Diversion	Owner	Use	Twsp	Rng	Sec d d d	Latitude	Longitude	Date	Surface	Depth to Water
3 WILL TRUITT STK 21S 25E 3 WILMA D. TRUITT PRO 21S 25E 0 WILMA D. TRUITT STK 21S 25E 3 MORAN OIL P.& D. CORP. PRO 21S 25E 21S 25E 3 WATTS LAND & CATTLE STK 21S 25E					-					Measured	Elevation	(ft bgs)
c 3 WILMA D. TRUITT PRO 21S 25E c 0 WILMA D. TRUITT STK 21S 25E 3 MORAN OIL P.& D. CORP. PRO 21S 25E 3 WATTSLAND & CATTLE 21S 25E 3 WATTSLAND & CATTLE STK 21S 25E	00550	3	WILL TRUITT	STK	218	25E	11 2 11	N32° 29' 53.01"	W104° 21' 54.62"	12-Apr-56	3,294	
c 0 WILMA D. TRUITT STK 21S 25E 3 MORAN OIL P.& D. CORP. PRO 21S 25E 21S 25E 21S 25E 3 WATTSLAND & CATTLE STK 21S 25E	2 01166	3	WILMA D. TRUITT	PRO	218	25E	11 31	N32° 29' 25.22"	W104° 22' 25.95"		3,360	
3 MORAN OIL P.& D. CORP. PRO 21S 25E 15 233 N32° 28' 45.23" W104° 22' 57.13" 21S 25E 11 2 1 1 21S 25E 11 3 1 3 3 W104° 22' 57.13" 21S 25E 11 3 4 3 W104° 23' 28.16"	C 02268 ^C	0	WILMA D. TRUITT	STK	218	25E	11 341	N32° 29' 11.43"	W104° 22' 10.66"	31-Dec-41	3,282	25
21S 25E 11 2 1 1 21S 25E 11 3 4 3 3 WATTSLAND & CATTLE STK 21S 25E 22 3 3 N32° 27' 26.37" W104° 23' 28.16"	01399	3	MORAN OIL P.& D. CORP.	PRO	218	25E	15 233	N32° 28' 45.23"	W104° 22' 57.13"		3,404	
21S 25E 11 3 4 3	JSGS #1				218	25E	11 2 11			12-Jan-78	3,268	62.69
3 WATTSLAND & CATTLE STK 21S 25E 22 33 N32° 27' 26.37" W104° 23' 28.16"	JSGS #2				218	25E	11 343			20-Nov-92	3,278	34.09
	3 01451	3		STK	218	25E	22 33	N32° 27' 26.37"	W104° 23' 28.16"	12-mr-90	3,404	260

* = Data obtained from the New Mexico Office of the State Engineer Website (http://iwaters.ose.statc.nm.us;7001/iWATERS/wr_RegisServlet1) and USGS Database.

A = in acre feet per annum

^B = Interpolated from USGS Topographical Map
^C = Wells C-02268 and USGS #1 are probably the same well. Well C-02268 could not be located in the field.

STK = 72-12-1 Livestock watering PRO = 72-12-1 Livestock watering PRO = 72-12-1 Prospecting or development of natural resource (quarters are 1=NW, 2=NE, 3=SW, 4=SE) (quarters are biggest to smallest - X Y are in Fcct - UTM are in Meters) Shaded area indicates wells not shown on Figure 2



TABLE 2

Chevron USA

Catclaw Draw #21 Pit Analytical Results Summary

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Sample Location	Sampling Interval (FT. BGS ¹)	SAMPLE ID#	Date	Lithology	Status	GRO³ mg/Kg	DRO ⁴ mg/Kg	TPH ⁵ mg/Kg	BTEX mg/Kg	Benzene mg/Kg	Toluene mg/Kg	Ehtylbenzene mg/Kg
East Perimeter	8-9	6-8 East Perimeter	7/28/2006	Caliche	in-situ	<10.0	<10.0	<10.0	<0.015	<0.005	<0.005	<0.005
West Perimeter	8-9	West Perimeter	7/28/2006	Caliche/Rock in-situ	in-situ	<10.0	<10.0	<10.0	<0.015	<0.005	<0.005	<0.005
South Perimeter	8-9	6-8 South Perimeter	7/28/2006	Caliche	in-situ	<10.0	<10.0	<10.0	<0.015	<0.005	<0.005	<0.005
North Perimeter	8-9	North Perimeter	7/28/2006	Caliche/Rock	in-situ	<10.0	<10.0	<10.0	0.010	<0.005	0.010	<0.005
Stiffened Pit Contents	4	Stiffened Pit Contents	7/28/2006	Sand	in-situ	<10.0	583	583	0.007	<0.005	0.007	<0.005
North Pit	0-1	0-1 North Pit	7/28/2006	Clayey Sand	in-situ	<10.0	<10.0	<10.0	<0.015	<0.005	<0.005	<0.005
		New Mexico Oil		Conservation Division Remedial Goals	al Goals			1,000	20	10		

²VOC-Volatile Organic Contaminants/Constituents

³GRO-Gasoline Range Organics C₆-C₁₀

⁴DRO-Diesel Range Organics C₁₀-C₂₈

⁵TPH-Total Petroleum Hydrocarbon = GRO+DRO.

Bolded values are in excess of the New Mexico Oil Conservation Division guideline threshold for the parameter

⁷Italicized values are < the instrument detection limit.

(-) indicates the sample was not collected due to refusal.

Reported detection limits are considered "de minimus" values and are included in the GRO/DRO and BTEX summations.

WQCC (New Mexico Water Quality Control Commission) Chloride residuals cannot be capable of impacting local groundwater in excess of the 250 mg/L WQCC standard.





PHONE (325) 673-7001 · 2111 BEECHWOOD · ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR ENVIRONMENTAL PLUS, INC. ATTN: PAT McCASLAND P.O. BOX 1558

EUNICE, NM 88231 FAX TO: (505) 394-2601

Receiving Date: 07/28/06

Reporting Date: 08/01/06

Project Owner: CHEVRON TEXACO (#200078)
Project Name: CATCLAW DRAW #21 PIT

Project Location: NOT GIVEN

Sampling Date: 07/28/06

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: BC

Analyzed By: BC

LAB NO. SAMPLE ID	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE	07/31/06	07/31/06	07/31/06	07/31/06
H11395-1 EAST PERIMETER	<0.005	<0.005	<0.005	<0.015
H11395-2 WEST PERIMETER	<0.005	<0.005	<0.005	<0.015
H11395-3 SOUTH PERIMETER	<0.005	0.005	<0.005	<0.015
H11395-4 NORTH PERIMETER	<0.005	0.010	<0.005	<0.015
H11395-5 STIFFENED PIT CONTENTS	<0.005	0.007	<0.005	<0.015
H11395-6 NORTH PIT	<0.005	<0.005	<0.005	<0.015
Quality Control	0.100	0,105	0.106	0.299
True Value QC	0,100	0.100	0,100	0.300
% Recovery	99.6	105	106	99.7
Relative Percent Difference	<0.1	6.7	7.8	2.0

METHOD: EPA SW-846 8260

Date

PLEASE NOTE: Liability and Damegeo. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tori, shall be limited to the amount paid by client for analysis. All claims, including those for negligence and any other cause wheteover shall be deemed waived unless made in willing and received by Cardinal within thing (30) days after completion of the hipprocratic service. Unless that the including without limitation, business interruptions, loss of use, or loss of profits incurred by client. Its substituties, affiliates of subcessors arising out of or related to the performance of services hereunder by Cardinal. regardless of whether such claim to based upon any of the above-stated reasons or otherwise.





PHONE (325) 673-7001 · 2111 BEECHWOOD · ABILENE, TX 79603

PHONE (505) 393-2326 · 101 E. MARLAND · HOBBS, NM 88240

ANALYTICAL RESULTS FOR ENVIRONMENTAL PLUS, INC. ATTN: PAT McCASLAND P.O. BOX 1558 **EUNICE, NM 88231** FAX TO: (505) 394-2601

Receiving Date: 07/28/06

Reporting Date: 08/01/06

Project Owner: CHEVRON TEXACO (#200078) Project Name: CATCLAW DRAW #21 PIT

Project Location: NOT GIVEN

Sampling Date: 07/28/06

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: BC Analyzed By: BC/AB

	GRO	DRO	
	(C ₆ -C ₁₀)	(>C ₁₀ -C ₂₈)	CI*
LAB NUMBER SAMPLE ID	(mg/Kg)	(mg/Kg)	(mg/Kg)

ANALYSIS D	ATE	07/31/06	07/31/06	07/31/06
H11395-1	EAST PERIMETER	<10.0	<10.0	160
H11395-2	WEST PERIMETER	<10.0	<10.0	64
H11395-3	SOUTH PERIMETER	<10.0	<10.0	864
H11395-4	NORTH PERIMETER	<10.0	<10.0	62
H11395-5	STIFFENED PIT CONTENTS	<10.0	583	42000
H11395-6	NORTH PIT	<10.0	<10.0	1280
Quality Conti	rol	780	770	990
True Value C	C	800	800	1000
% Recovery		97.5	96.2	99.0
Relative Per	cent Difference	0.9	7.2	1.0

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; Cl': Std. Methods 4500-Cl'B *Analyses performed on 1:4 w:v aqueous extracts.

H11395A

PLEASE NOTE: Liability and Damagea. Cardinat's liability and client's exclusive remedy for any claim arising, whether based in contract or tool, shall be limited to the amount part by client for multysus. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinat within thiny (30) days after completion of the applicable. In no event shall Cardinat be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its substitutions of successors arising out of or related to the performance of services hereunder by Cardinat, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



Cardinal Laboratories Inc.

101 East Marland, Hobbs, NM 88240 505-393-2326 Fax 505-393-2476

2111 Beechwood, Abilene, TX 79603

ANALYSIS REQUES 1 of 1 Attention: Mr. Jim Duke Eunice, NM 88231 915-673-7001 Fax 915-673-7020 P. O. Box 1949 Chevron USA Bill To 505-394-3481 / 505-394-2601 Eunice New Mexico 88231 Environmental Plus, Inc. Catclaw Draw #21 Pit Pat McCasland P.O. BOX 1558 Chevron USA #200078 EPI Project Manager City, State, Zip EPI Phone#/Fax# Project Reference Company Name Client Company Billing Address Facility Name

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EPI Sampler Name	ne Pat McCasland																	***************************************						*******	
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LAB I.D.	SAMPLE I.D.	RMO(3) RO BAR(8)	# СОИТАІИЕВЗ	GROUND WATER	MASTEWATER JIOS	CBNDE OIF	SENDGE	:яэнто	ACID/BASE	ICE/COOF	язнто	DATE	TIME	BTEX 8021B	Maros H9T	снговірєг (сі.)	SULFATES (SO,=)	Hq	TCLP	<<< ਸ3HTO					TORTOMACOCO RETERMO CACALACACAMACACAMACACACACACACACACACACACA
M11895-1 1	1 East Perimeter	၁	2	H	A	×		Щ		×		7/28/06	10:00	×	×	×				<u> </u>	┢	一	T		
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Sample: Hipport H	Date. 7-28-06	Received By:	/ed.By							Fax	Res	Fax Results To Pat McCasland - EPI @ 505-394-2601	t McCasla	- pu	EPI	Ø 50	5-39	4-26	5						1
	Time	b								HEM.	ARKS	REMARKS: Chain of custody requested. Send original reports to Pat McCasland - EPL	stody reques	ted,	endo	nigina	repor	ts to f	at Mc	Casla	- pur	d			

Pure Resources Catclaw Draw Unit #21 200078

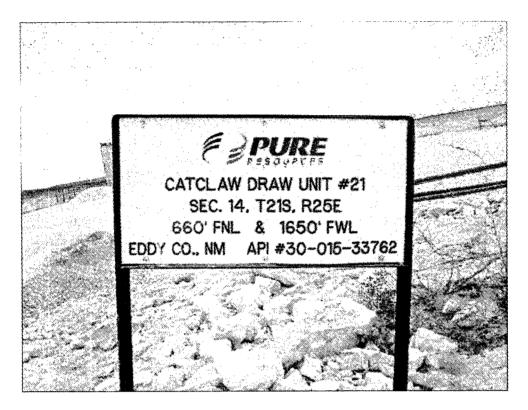
Please use at least 500 grams of sample for extraction for chloride test. John

rock is present.

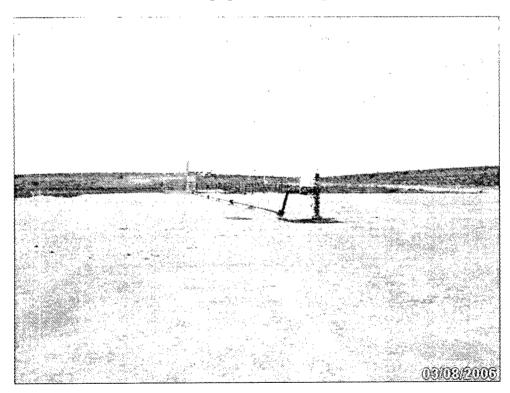
Sample Cool & Intact

elivered by





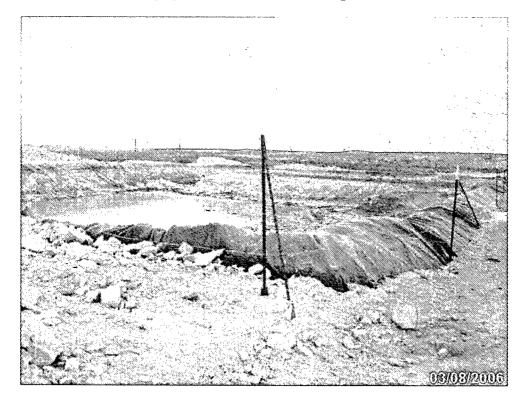
Photograph #1- Lease sign.



Photograph #2 - Pit and berm looking southeast.



Photograph #3 - Pit and berm looking southeast.



Photograph #4 - Pit and berm looking southeast.

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

Printed Name/Title _

State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 June 1, 2004

For drilling and production facilities, submit to appropriate NMOCD District Office.

For downstream facilities, submit to Santa

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 \(\subseteq\) Closure of a pit or below-grade tank \(\subseteq\) Operator: Chevron USA O-Grid #4323 (Pure Resources O-Grid #150628) Telephone: 505.394.1237 e-mail address: LDuk@chevron.com Address: PO Box 1949 2401 Avenue O Eunice, New Mexico 88231 Unit Letter (UL): C Qtr/Qtr: NE1/4 NW1/4 Facility or well name: Catclaw Draw Unit #21 API #: 30-025-33762 Section: 14, T21S, R25E Latitude: N 32°29'05.59" Longitude: W 104°22'08.83" NAD: 1927 ☐ 1983 ☐ WGS 84 ☒ County: Eddy Surface Owner: Federal ☐ State ☒ Private ☐ Indian ☐ Below-grade tank Type: Drilling ☑ Production ☐ Disposal ☐ Workover ☐ Emergency ☐ Volume: bbl Type of fluid: Lined Unlined Construction material: Liner type: Synthetic ☑ Thickness 12 mil Clay ☐ Double-walled, with leak detection? Yes

If not, explain why not. Pit Volume: ~3,000 bbl Less than 50 feet (20 points) Depth to ground water (vertical distance from bottom of pit to seasonal high water 50 feet or more, but less than 100 feet (10 points) \boxtimes elevation of ground water.) ~56'bgs 100 feet or more (0 points) Yes (20 points) Wellhead protection area: (Less than 200 feet from a private domestic water Nο \boxtimes (0 points) source, or less than 1000 feet from all other water sources.) Less than 200 feet (20 points) Distance to surface water: (horizontal distance to all wetlands, playas, irrigation 200 feet or more, but less than 1,000 feet (10 points) canals, ditches, and perennial and ephemeral watercourses.) \boxtimes 1,000 feet or more (0 points) Ranking Score (Total Points) 10 If this is a pit closure: (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 your are burying in place) onsite \(\sqrt{\omega} \) offsite \(\sqrt{\omega} \) If offsite, name of facility \(\sqrt{\omega} \) Lea Land . (3) Attach a general description of remedial action taken including remediation start date and end date. (4) Groundwater encountered: No 🛛 Yes 🔲 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: It is proposed to close this pit consistent with the "ChevronTexaco Drilling and Reserve Pit Closure General Plan, December 2004" and the NMOCD Pit and Below-Grade Tank Guidelines, November 1, 2004 as promulgated under NMOCD Rule 50 (19.15.2.50 NMAC). Pit Status: Liner intact \(\bigcirc \) Liner punctured or torn \(\bigcirc \) Method of Closure: The contents of the pit will be stiffened and encapsulated on site. Approximately 50% of the pit volume, i.e., 600 cubic yards, will be disposed of. Encapsulation will consist of mixing earthen materials with the pit contents, as necessary to stiffen the pit contents sufficiently to provide physical stability and support the pit cover. Upon the pit contents being stiffened as required, the edges of the liner will be folded over the edges of the stiffened mud and cuttings and the pit will be covered with a 20-mil thick impervious, reinforced synthetic or fabricated liner meeting ASTM standards that is designed to be resistant to the material encapsulated. The liner will then be covered with a minimum of three feet of clean soil or like material that is capable of supporting native plant growth 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 will be closed according to NMOCD guidelines 🗵, a general permit 🗵, or an (attached) alternative OCD-approved plan 🗵. Printed Name/Title __ Jim Duke, Construction Representative 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:

Signature

Form C-144

Price, Wayne, EMNRD

From: Price, Wayne, EMNRD

Sent: Friday, December 08, 2006 11:50 AM

To: 'Pat Mccasland'; 'Duke, James (LDUK)'

Subject: RE: Chevron Catclaw Draw Unit #21 Alternative Pit Closure C-144

Pursuant to my discussion with Pat McCasland, OCD would entertain a proposal that includes removing the area where the salt concentration is highest. Please re-submit if you wish to proceed in this manner.

From: Pat Mccasland [mailto:pmccasland@envplus.net]

Sent: Monday, December 04, 2006 4:02 PM

To: 'Duke, James (LDUK)' **Cc:** Price, Wayne, EMNRD

Subject: RE: Chevron Catclaw Draw Unit #21 Alternative Pit Closure C-144

Jim,

Wayne Price returned my call this afternoon but I was out of the office. I called him back and left another message. I will try again tomorrow.

Pat

From: Duke, James (LDUK) [mailto:LDUK@chevron.com]

Sent: Sunday, December 03, 2006 8:12 PM

To: Pat Mccasland

Subject: RE: Chevron Catclaw Draw Unit #21 Alternative Pit Closure C-144

Pat.

Please let me know what you find out Mondat ASAP.

Thanks, Jim Duke

Construction Representative - New Mexico

MidContinent SBU

Chevron North America Upstream

Exploration And Production Company

2401 Avenue O, Eunice, NM 88231

Tel(505)394-1201 Fax(505)394-1215

Mobile(505)390-7225

mailto:lduk@chevron.com

From: Pat Mccasland [mailto:pmccasland@envplus.net]

Sent: Saturday, December 02, 2006 10:46 AM

To: Wayne Price

Cc: Mike Bratcher; Tim Gum (NMOCD-Artesia); Duke, James (LDUK); Minchew, Phillip W (Wayne); Gerry Guye (NMOCD-Artesia); 'Cody Miller'; Cody Miller'; Daniel Dominguez (EPI); Dave Duncan (EPI); 'EPI'; Janet Peterson;

'Jason Stegemoller'; Jessica Harper (EPI); 'Roger Boone'

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Environmental Plus, Inc. (EPI), on behalf of Chevron, submits the attached C-144 proposing alternative closure of the Chevron Catclaw Draw #21 drill pit. This document was previously submitted to Mr. Gerry Guye of the Artesia NMOCD office for approval. Mr. Guye subsequently turned the pit closure over to Mr. Mike Bratcher (NMOCD Artesia). After review, Mr. Bratcher said that approval of this proposal must come from the Santa Fe office. I will follow-up with a telephone call to you on Monday (12-4-06).

Sincerely,

Pat McCasland Senior Consultant & Safety Director HydroTech Services, LLC and Environmental Plus, Inc. P.O. Box 1558 2100 Avenue O Eunice, New Mexico 88231

Office:

505.394.3481

Cellular: FAX: 505.390.7864 505.394.2601

eddress:

pmccasland@envplus.net

From: Pat Mccasland [mailto:pmccasland@envplus.net]

Sent: Friday, October 13, 2006 12:36 PM

To: Gerry Guye (NMOCD-Artesia)

Cc: Wayne Price; Wayne Minchew (PMinchew@Chevron.com); Jim Duke (LDuk@Chevron.com); Thaddeus Kostrubala (NMSLO); 'Cody Miller'; Cody Miller (CMMG142@AOL.com); Daniel Dominguez (EPI); Dave Duncan

(EPI); 'EPI'; Janet Peterson; 'Jason Stegemoller'; Jessica Harper (EPI); 'Roger Boone'

Subject: Chevron Catclaw Draw Unit #21 Alternative Pit Closure C-144

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Attached for your consideration and approval is the Chevron Catclaw Draw Unit #21 Alternative Pit Closure C-144 and supporting documentation being submitted by Environmental Plus, Inc. (EPI) on behalf of Chevron USA. Hard copies will follow.

Please call if more information is needed or questions arise.

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Jim Duke
Construction Representative - New Mexico

MidContinent SBU
Chevron North America Upstream
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2401 Avenue O, Eunice, NM 88231
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eddress: pmccasland@envplus.net

Price, Wayne, EMNRD

From:

Pat Mccasland [pmccasland@envplus.net]

Sent:

Saturday, December 02, 2006 9:46 AM

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Price, Wavne, EMNRD

Cc:

Bratcher, Mike, EMNRD; Gum, Tim, EMNRD; Jim Duke; Wayne Minchew; Guye, Gerry, EMNRD; 'Cody Miller'; Cody Miller; Daniel Dominguez (EPI); Dave Duncan (EPI); 'EPI'; Janet

Peterson; 'Jason Stegemoller'; Jessica Harper (EPI); 'Roger Boone'

Subject:

FW: Chevron Catclaw Draw Unit #21 Alternative Pit Closure C-144

Attachments: Catclaw Draw #21 C-144 Alternative Closure.pdf

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pmccasland@envplus.net



December 12, 2006

Mr. Wayne Price, Cheif
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division Environmental Bureau
P. O. Box 6429
1220 S St. Francis Drive
Santa Fe, New Mexico 87505

Re: C-144 – Alternative Closure Proposal (Revised)

Chevron USA (O-Grid #4323)

Pure Resources (O-Grid #150628) Catclaw Draw Unit #21 (Ref. #200078) UL-C, Section 14, Township 21 South, Range 25 East, Eddy County, New Mexico Latitude: N 32°29'05.59" and Longitude: W 104°22'08.83"

Dear Mr. Price:

Environmental Plus, Inc. (EPI), on behalf of Chevron USA (Chevron) (Pure Resources) submits the enclosed New Mexico Oil Conservation Division (NMOCD) form C-144 and supporting information proposing an alternative closure at this site. The alternative closure proposes encapsulating the intact pit in place even though the bottom of the pit will be less than 50-feet from the groundwater, (i.e., the bottom of the existing pit is approximately 48-feet from the groundwater interface).

BACKGROUND

Initially, Chevron proposed closing the drill pit via encapsulation in accordance with the NMOCD Pit and Below-Grade Tank Guidelines, November 1, 2004 and the "ChevronTexaco Drilling and Reserve Pit Closure General Plan, December 2004" and was based on the following discussion and rationale.

The Chevron groundwater contour map indicates the groundwater underlying the Catclaw Draw #21 drill pit to be less than 50-feet bgs, however, after review of available water level information from the USGS and the New Mexico Office of the State Engineer (reference *Table 1*), the depth to groundwater at the site is calculated to be approximately 56-feet bgs and was derived as follows. The nearest water well to the Catclaw Draw #21 well site is down-gradient approximately 1,400-feet to the north northeast and has a 1992 USGS water level measurement of 34-feet below ground surface (bgs). On July 28, 2006, the groundwater level in this well was measured to be 35.0-feet bgs. The surface elevation of the windmill, as extrapolated from the USGS topographical map, is approximately 3,278-feet amsl. The calculated groundwater table elevation is 3,244-feet amsl, (i.e., 3,278 – 34 = 3,244). The surface elevation at the Catclaw Draw #21 well site, as extrapolated from the USGS topographical map, is 3,300-feet amsl. Reasonably assuming that the groundwater

table elevation under the well site is also 3,244-feet amsl, the calculated depth to groundwater is 56-feet amsl.

Mr. Van Barton, Compliance Officer, NMOCD Artesia Field Office, said that he would grant approval of the encapsulation proposal if the bottom of the pit was greater than 50-feet from groundwater. However, because the pit is approximately 8-feet deep and the groundwater is approximately 56-feet below the land surface where the drill pit was constructed, the bottom of the encapsulated pit is only 48-feet from the groundwater, negating local NMOCD approval. Mr. Barton said that encapsulation proposals of pits less than 50-feet from groundwater could be submitted to the Santa Fe office of the NMOCD for consideration and approved, if deemed technically acceptable. Mr. Wayne Price, NMOCD Santa Fe office, said that he could possibly approve the alternative closure proposal if the pit liner was intact and fluids had not been released from the pit, as evidenced by analysis of soil samples collected from perimeter locations adjacent to the pit at 4-feet to 8-feet bgs. Subsequently, on July 28, 2006, after timely notification of the Artesia and Santa Fe NMOCD offices, samples of the soil from the perimeter locations adjacent to the pit were collected and submitted to the laboratory for analysis. The laboratory reports are attached and the results summarized in *Table 2*.

PIT PERIMETER SAMPLES ANALYTICAL RESULTS

According to the analytical results, benzene, toluene, ethylbenzene and total xylenes (BTEX) and total petroleum hydrocarbon (TPH) are not an issue inside or outside the pit. Chloride results from analysis of the east perimeter, west perimeter and the north perimeter soil samples collected from 6-feet to 8-feet bgs were less than 250 mg/Kg. The chloride concentration in the south perimeter sample collected from 6-feet to 8-feet bgs beneath the caliche well pad was 864 mg/Kg and probably resulted from well pad activities rather than being from the pit. It can be concluded from the analytical results from the perimeter samples that the pit did not over-flow.

NORTH PIT SAMPLE ANALYTICAL RESULTS

A soil sample was collected from an unlined but fenced surface depression north of the lined drill pit to delineate/verify possible drilling fluid impact. Total petroleum hydrocarbon and benzene, toluene, ethylbenzene and total xylenes (BTEX) were not detected above the respective method detection limits. The chloride concentration was 1,280 mg/Kg. Given that the chloride concentration of the stiffened pit contents is 42,000 mg/Kg, it is not reasonable to conclude that the chloride residual in the north pit emanated from the drill pit, but will require remediation.

ALTERNATIVE CLOSURE PROPOSAL REQUEST

Given that the pit liner is intact and the laboratory results from analysis of the soil samples collected from locations adjacent to the perimeter of the pit support the conclusion that the pit did not over-flow into the surrounding environment, it is proposed that a geotextile cushion be installed in the west part of the lined pit to ensure the integrity of the under liner, that the stiffened pit contents be evenly distributed over the pit and that a 20-mil reinforced polyethylene liner, cushioned above and below with geotextile, be installed over the stiffened pit contents. The pit will then be brought to grade with local soil/rock and the surface reseeded with the desires of the landowner. It is furthermore proposed that the impacted soils in the north pit be placed in the pit and encapsulated along with the drill pit contents and the excavated are tested to verify achievement of the NMOCD remedial goals. Additionally, in the event of a liner failure,



to minimize the chloride source term that could potentially migrate to groundwater, approximately 50% of the stiffened drill pit volume will be disposed of off-site, (i.e., approximately 600 cubic yards). A final C-144 and supporting documentation will be submitted to the NMOCD upon completion of the project.

This proposal will be implemented upon approval by the NMOCD and consensus with the New Mexico State Land Office.

Please direct all official communications to:

Chevron USA

Jim Duke, Construction Representative

PO Box 1949

Eunice, New Mexico 88231 Telephone: 505.394.1237 Email: LDuk@chevron.com

Should you have any questions or concerns, please call me at (505) 394-3481 or Mr. Jim Duke at (505) 394-1237 or via e-mail at <u>LDuk@chevron.com</u>.

Sincerely,

ENVIRONMENTAL PLUS, INC.

Pat McCasland

Senior Environmental Consultant

cc: Mike Bratcher, NMOCD Artesia

Jim Duke, Chevron USA

Wayne Minchew, Chevron USA

Thaddeus Kostrubala, State of New Mexico

file

Enclosures: Topographical Map

Site Location Map

Site Map

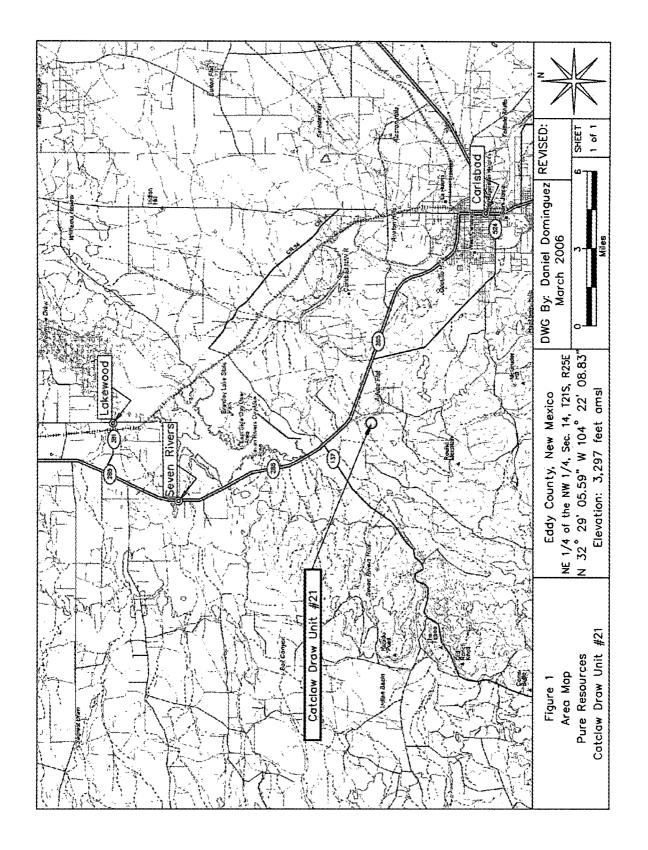
Groundwater Map
Table 1 - Well Data

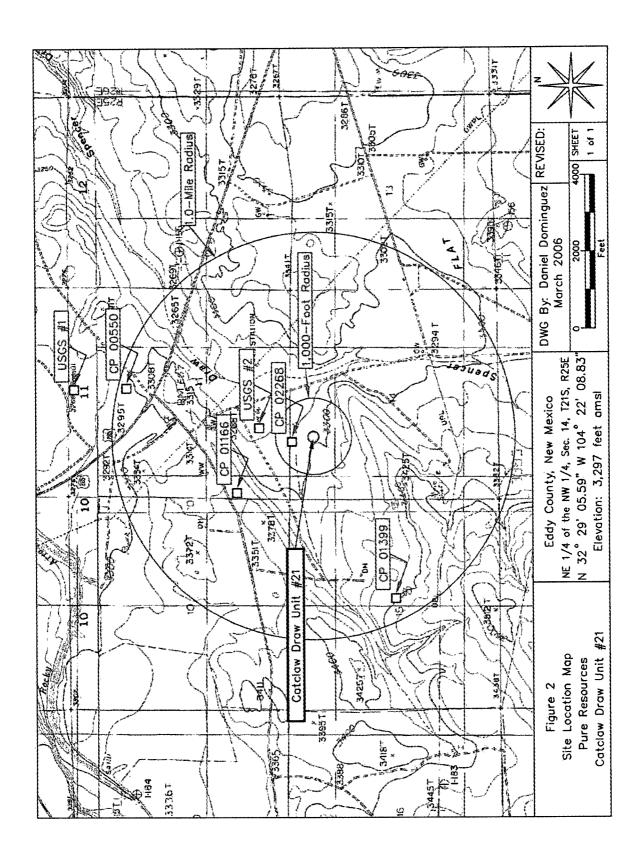
Table 2 - Analytical Results Summary

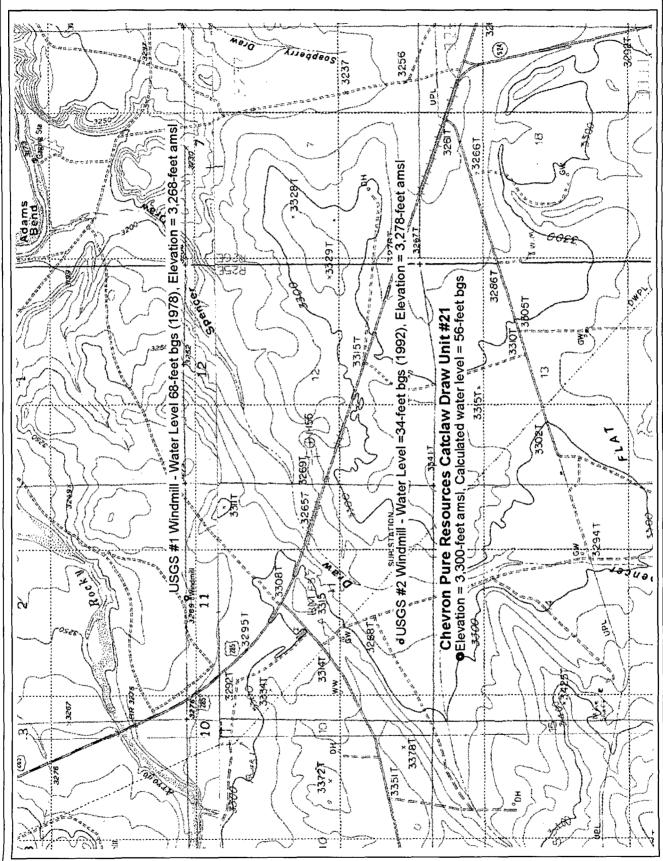
Laboratory Reports

Photographs

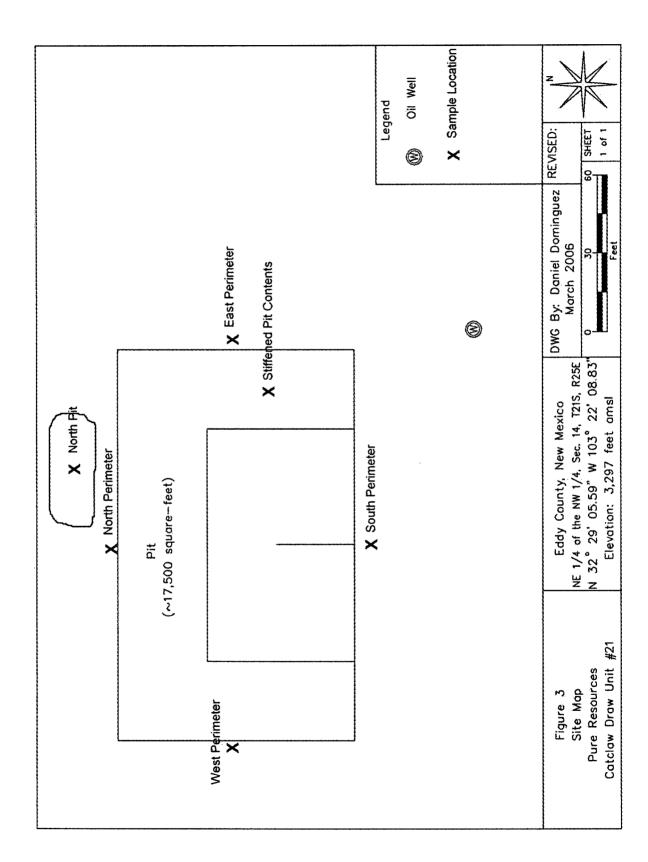
NMOCD Form C-144







Pure Resources Catclaw Draw Unit #21 200078



ESOURCES



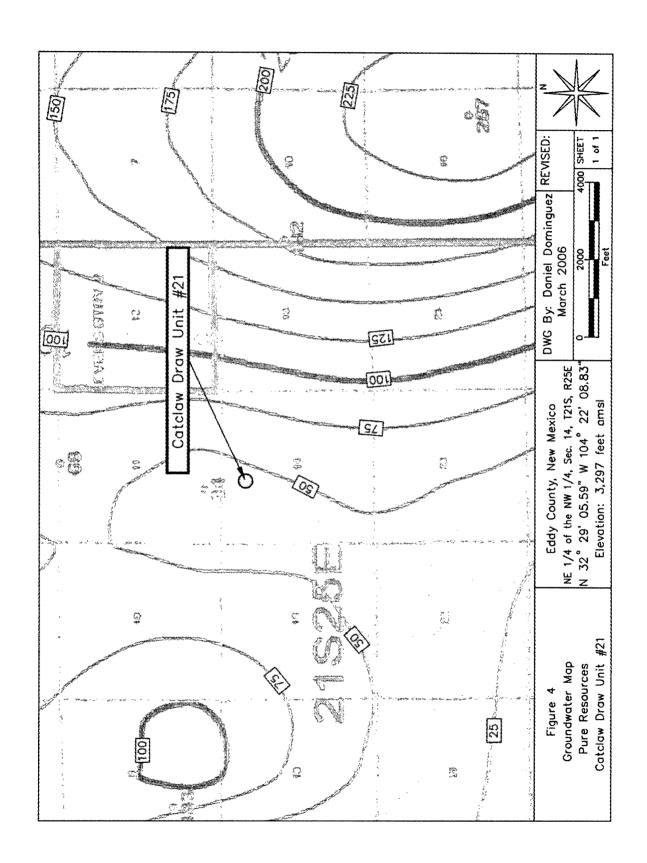




TABLE 1

WELL INFORMATION REPORT*

Pure Resources Catclaw Draw Unit #21 - Ref #200078

00550 3		Owner	Use	Twsp	Rng	Sec d d d	Latitude	Longitude	Date	Surface	Water
00550 3									Measuren	Elevation	(ft bgs)
	M	VILL TRUITT	STK	218	25E	11 2 1 1	N32° 29' 53.01"	11 2 1 1 N32° 29' 53.01" W104° 21' 54.62" 12-Apr-56	12-Apr-56	3,294	
01166 3	WIL	WILMA D. TRUITT	PRO	21S	25E	11 31	11 31 N32° 29' 25.22"	W104° 22' 25.95"		3,360	
02268 ^C 0	MIL	WILMA D. TRUITT	STK	218	25E	11 341	N32° 29' 11.43"	11 3 4 1 N32° 29' 11.43" W104° 22' 10.66"	31-Dec-41	3,282	25
01399 3	MORA	MORAN OIL P.& D. CORP.	PRO	21S	25E	15 233	N32° 28' 45.23"	N32° 28' 45.23" W104° 22' 57.13"		3,404	
ISGS #1				218	25E	11 2 1 1			12-Jan-78	3,268	62.99
ISGS #2				218	25E	11 343			20-Nov-92	3,278	34.09
01451 3	WATTS	/ATTS LAND & CATTLE	STK	21S	25E	25E 22 33	N32° 27' 26.37"	N32° 27' 26.37" W104° 23' 28.16"	06-Jun-71	3,404	260

^{* =} Data obtained from the New Mexico Office of the State Engineer Website (http://iwaters.ose.state.nm.us.7001/iWATERS/wr_RegisServlet1) and USGS Database.

STK = 72-12-1 Livestock watering PRO = 72-12-1 Prospecting or development of natural resource (quarters are 1=NW, 2=NE, 3=SW, 4=SE) (quarters are biggest to smallest - X Y are in Feet - UTM are in Meters) Shaded area indicates wells not shown on Figure 2

 $^{^{\}rm A}$ = in acre feet per annum $^{\rm B}$ = Interpolated from USGS Topographical Map $^{\rm C}$ = Wells C-02268 and USGS #1 are probably the same well. Well C-02268 could not be located in the field.



TABLE 2

Chevron USA

	zene Zg	35	35	35	35	35)5	
	Ehrylbenzene mg/Kg	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	
	Toluene mg/Kg	<0.005	<0.005	<0.005	0.010	0.007	<0.005	
	Benzene mg/Kg	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	10
шина	BTEX mg/Kg	<0.015	<0.015	<0.015	0.010	0.007	<0.015	20
to come	TPH ⁵ mg/Kg	<10.0	<10.0	<10.0	<10.0	583	<10.0	1,000
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	DRO ⁴ mg/Kg	<10.0	<10.0	<10.0	<10.0	583	<10.0	
•	GRO³ mg/Kg	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	
	Status	in-situ	in-situ	in-situ	in-situ	in-situ	in-situ	ial Goals
Second Sign Han I to take the tree of the second of the se	Lithology	Caliche	Caliche/Rock in-situ	Caliche	Caliche/Rock	Sand	Clayey Sand	l Conservation Division Remedial Goals
ŀ	Date	7/28/2006	7/28/2006	7/28/2006	7/28/2006	7/28/2006	7/28/2006	Conservation
	SAMPLE ID#	East Perimeter	West Perimeter	South Perimeter	North Perimeter	Stiffened Pit Contents	North Pit	New Mexico Oil
	Sampling Interval (FT. BGS¹)	8-9	8-9	8-9	8-9	4	0-1	
	Sample Location	East Perimeter	West Perimeter	South Perimeter	North Perimeter	Stiffened Pit Contents	North Pit	

VOC-Volatile Organic Contaminants/Constituents

³GRO-Gasoline Range Organics C₆-C₁₀

⁴DRO-Diesel Range Organics C₁₀·C₂₈

Bolded values are in excess of the New Mexico Oil Conservation Division guideline threshold for the parameter ⁵TPH-Total Petroleum Hydrocarbon ≈ GRO+DRO.

'Italicized values are < the instrument detection limit.

(--) indicates the sample was not collected due to refusal. ⁸na - Not Analyzed

Reported detection limits are considered "de minimus" values and are included in the GRO/DRO and BTEX summations.

WGCC - (New Mexico Water Quality Control Commission) Chloride residuals camot be capable of impacting local groundwater in excess of the 250 mg/L WQCC standard.





PHONE (325) 673-7001 - 2111 BEECHWOOD - ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR ENVIRONMENTAL PLUS, INC. ATTN: PAT McCASLAND

P.O. BOX 1558 EUNICE, NM 88231 FAX TO: (505) 394-2601

Receiving Date: 07/28/06

Reporting Date: 08/01/06

Project Owner: CHEVRON TEXACO (#200078)
Project Name: CATCLAW DRAW #21 PIT

Project Location: NOT GIVEN

Sampling Date: 07/28/06

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: BC

Analyzed By: BC

LAB NO. SAMPLE ID	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE	07/31/06	07/31/06	07/31/06	07/31/06
H11395-1 EAST PERIMETER	<0.005	<0.005	<0.005	<0.015
H11395-2 WEST PERIMETER	<0.005	<0.005	<0.005	<0.015
H11395-3 SOUTH PERIMETER	<0.005	0.005	<0.005	<0.015
H11395-4 NORTH PERIMETER	<0.005	0.010	<0.005	<0.015
H11395-5 STIFFENED PIT CONTENTS	<0.005	0.007	<0.005	<0.015
H11395-6 NORTH PIT	<0.005	<0.005	<0.005	<0.015
Quality Control	0.100	0.105	0.106	0.299
True Value QC	0,100	0.100	0,100	0.300
% Recovery	99.6	105	106	99.7
Relative Percent Difference	<0.1	6.7	7.8	2.0

METHOD: EPA SW-846 8260

Date

PLEASE NOTE: Liability and Damageo. Cardinal's liability and client's exclusive remedy for any datire arising, whether based in centract or tort, shall be limited to the aniount paid by chert for analysis. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in willing and received by Cardinal within thinly (30) days after completion of the dipole includes a service. By exerging paid Cardinal be included by client, its substitution, business interruptions, loss of use, or toos of profits incurred by client, its substitution, business interruptions, loss of use, or toos of profits incurred by client, its substitution, business interruptions, loss of use, or toos of profits incurred by client, its substitution, surfaces of whether such claim is based upon any of the above-stated reasons or otherwise.





PHONE (325) 673-7001 - 2111 BEECHWOOD - ABILENE, TX 79603

PHONE (505) 393-2326 - 101 E. MARLAND - HOBBS, NM 88240

ANALYTICAL RESULTS FOR ENVIRONMENTAL PLUS, INC. ATTN: PAT McCASLAND P.O. BOX 1558 **EUNICE, NM 88231** FAX TO: (505) 394-2601

Receiving Date: 07/28/06

Reporting Date: 08/01/06

Project Owner: CHEVRON TEXACO (#200078)

Project Name: CATCLAW DRAW #21 PIT

Project Location: NOT GIVEN

Sampling Date: 07/28/06

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: BC

Analyzed By: BC/AB

	GRO	DRO	
	(C ₆ -C ₁₀)	(>C ₁₀ -C ₂₈)	CI*
LAB NUMBER SAMPLE ID	(mg/Kg)	(mg/Kg)	(mg/Kg)

ANALYSIS E	DATE	07/31/06	07/31/06	07/31/06
H11395-1	EAST PERIMETER	<10.0	<10.0	160
H11395-2	WEST PERIMETER	<10.0	<10.0	64
H11395-3	SOUTH PERIMETER	<10.0	<10.0	864
H11395-4	NORTH PERIMETER	<10.0	<10.0	62
H11395-5	STIFFENED PIT CONTENTS	<10.0	583	42000
H11395-6	NORTH PIT	<10.0	<10.0	1280
Quality Cont	rol	780	770	990
True Value (QC	800	800	1000
% Recovery		97.5	96.2	99.0
Relative Per	cent Difference	0.9	7.2	1.0

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI': Std. Methods 4500-CI'B *Analyses performed on 1:4 w:v aqueous extracts.

H11395A

PLEASE NOTE: Liability and Damagea. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for purelyses. All claims, including those for negligence and any other cause whatsoever shall be deemed valved unless made in writing and received by Cardinal within thiny (30) days after completion of the approache, in no event shall Cardinal be islable for includental or consequential damages, including, without limitation, tustiness interruptions, loss of use, or loss of profits incurred by client, its substitutes affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



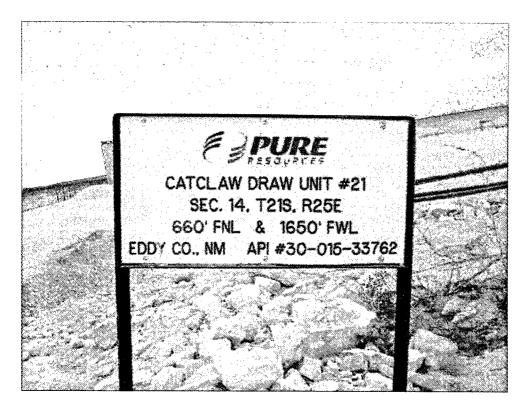
Cardinal Laboratories Inc. 101 East Marland, Hobbs, NM 88240 505-393-2326 Fax 505-393-2476

2111 Beechwood, Abilene, TX 79603 915-673-7001 Fax 915-673-7020

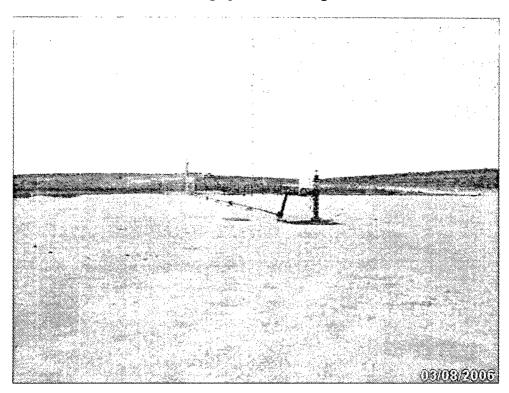
1 of 1

Company Name	Environmental Plus. Inc.	ntal Plus.	5	1.		 				2	BIII To	BIII To		-			ANK	1 1	12	ANAL YSIS REQUEST	ES		l	Г
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Billing Address	P.O. BOX 1558	558				Τ			•			(
City, State, Zip	Eunice New Mexico		5 88231	<u>۳</u>		Γ			J	9	5	Chevron USA							ecc:mec	/				
EPI Phone#/Fax#		11/505-3	94.	601		Γ			o.	Ó	8	P. O. Box 1949		*****							-			***************************************
Client Company	Chevron USA	A				Γ			1	2	2	Finice NM 88231	7.	-						****				****
Facility Name	Catclaw Draw #21	aw #21 Pit	<u>.</u>			Γ		· <						,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,										
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Relinquiched by	7-11-1 1-11-11-11-11-11-11-11-11-11-11-11	70/507:75	Recei	Received By: (lab stati)	gap y	statf)	M	M.	1	1	Plea	se use at	Please use at least 500 grams of sample for extraction for chloride test. 184	rams	of se	id Lin	e for	extra	actio	n for	chlor	ide te	st.	- 150 - 150
Delivered by:		Sample Cool & Intact	000	k Intac	A	77	2	Cjiecked By	d By:	-		45 45 45 45 45 45 45 45 45 45 45 45 45 4	and an electrical	J.	2	2								

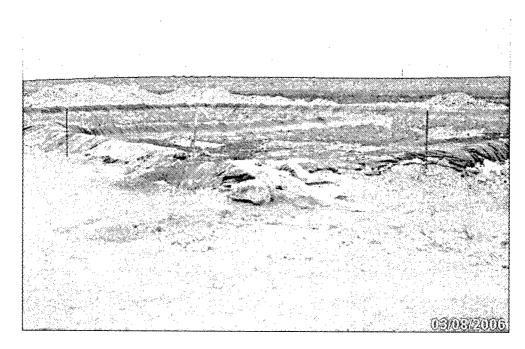




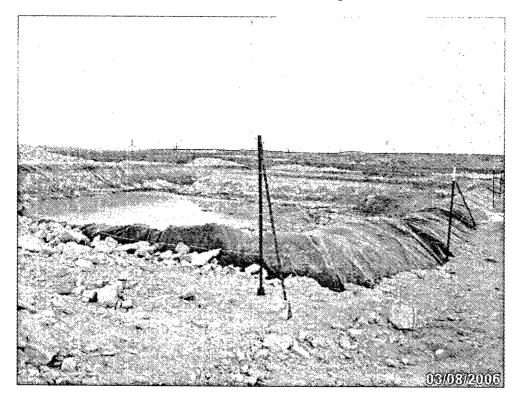
Photograph #1- Lease sign.



Photograph #2 - Pit and berm looking southeast.



Photograph #3 - Pit and berm looking southeast.



Photograph #4 - Pit and berm looking southeast.

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

State of New Mexico Energy Minerals and Natural Resources

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

Form C-144

June 1, 2004

For drilling and production facilities, submit to appropriate NMOCD District Office.

For deposit 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 ☒		
Operator: Chevron USA O-Grid #4323 (Pure Resources O-Grid #150628) Telephone: 505.394.1237 e-mail address: LDuk@chevron.com		
Address: PO Box 1949 2401 Avenue O Eunice, New Mexico 88231		
Facility or well name: Catclaw Draw Unit #21 API #: 30-025-33762 Unit Letter (UL): C Qtr/Qtr: NE¼ NW¼ Section: 14, T21S, R25E		
County: Eddy Latitude: N 32*29*05.59" Longitude: W 104*22*08.83" NAD: 1927 ☐ 1983 ☐ WGS 84 ☒		
Surface Owner: Federal State Private Indian		
Pit Below-grade tank		
Type: Drilling ☑ Production ☐ Disposal ☐ Workover ☐ Emergency ☐	mergency Volume: bbl Type of fluid:	
Lined 🛛 Unlined 🗔	Construction material:	
Liner type: Synthetic ☑ Thickness 12 mil Clay ☐	Double-walled, with leak detection? Yes If not, explain why not.	
Pit Volume: ~3,000 bbl		
Depth to ground water (vertical distance from bottom of pit to seasonal high water	Less than 50 feet	(20 points)
	50 feet or more, but less than 100 feet	(10 points)
elevation of ground water.) ~56'bgs	100 feet or more	(0 points)
Wallhard protection area. (Lass than 200 fact from a private demonstration	Yes	(20 points)
Wellhead protection area: (Less than 200 feet from a private domestic water	No	(0 points)
source, or less than 1000 feet from all other water sources.)		
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation	Less than 200 feet	(20 points)
canals, ditches, and perennial and ephemeral watercourses.)	200 feet or more, but less than 1,000 feet	(10 points)
	1,000 feet or more	(0 points)
	1,000 feet of filore	(o points)
	Ranking Score (Total Points)	10
If this is a pit closure: (1) Attach a diagram of the facility showing the pit's relations	Ranking Score (Total Points)	10
If this is a pit closure: (1) Attach a diagram of the facility showing the pit's relations if your are burying in place) onsite ☑ offsite ☑ If offsite, name of facility Lea	Ranking Score (Total Points) hip to other equipment and tanks. (2) Indica	10 te disposal location: (check the onsite box
	hip to other equipment and tanks. (2) Indicate Land (3) Attach a general decrease.	te disposal location: (check the onsite box scription of remedial action taken
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