

From: [Billings, Bradford, EMNRD](#)
To: ["Mann, Ryan"; "Joel Lowry"](#)
Cc: ["jmichelson@chevron.com"](mailto:jmichelson@chevron.com)
Subject: RE: 1RP-3688 Chevron"s VGSAU 148 Alternative Reclamation Strategy
Date: Tuesday, March 3, 2020 3:45:00 PM
Attachments: [image001.jpg](#)
[image003.jpg](#)
[image002.jpg](#)
[image004.jpg](#)

3/3/2020

Jason Michelson – Chevron
Joel Lowry – eTechEnvironmental

RE: Work plan Approval for 1RP-3688

To All,

The Alternate Remedial Action as outlined in email string below dated February 25, 2020, is APPROVED by the Oil Conservation Division (OCD).

As per Mr. Mann's request please inform OCD if there is a deviation needed from this plan. Also, be sure to include pertinent portions of the below plan into report at conclusion. This will assist in review.

Please keep this communication, as NO paper copy will follow.

OCD appreciates your efforts.

Sincerely,

Bradford Billings
EMNRD/OCD
Santa Fe

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations

From: Mann, Ryan <rmann@slo.state.nm.us>
Sent: Tuesday, March 3, 2020 2:24 PM

To: 'Joel Lowry' <joel@etechenv.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Cc: Daniel Dominguez <danield@etechenv.com>
Subject: [EXT] RE: 1RP-3688 Chevron's VGSAU 148 Alternative Reclamation Strategy

Mr. Lowry,

NMSLO approves of this alternative remediation strategy. Approval from NMOCD is also required. Let me know if you deviate from this plan.

Ryan Mann

Remediation Specialist

Surface Resources

Office: (575)392-3697

Cell: (505)699-1989

New Mexico State Land Office

914 N. Linam Street

Hobbs, NM 88240

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From: Joel Lowry [<mailto:joel@etechenv.com>]

Sent: Tuesday, February 25, 2020 8:12 AM

To: Mann, Ryan <rmann@slo.state.nm.us>; bradford.billings@state.nm.us

Cc: Daniel Dominguez <danield@etechenv.com>

Subject: [EXTERNAL] 1RP-3688 Chevron's VGSAU 148 Alternative Reclamation Strategy

Mr. Billings and Mr. Mann,

Pleasure speaking to you gentlemen. The following email has been prepared in regards to Chevron's VGSAU 148 Environmental Remediation Site (1RP-3688). The Site is located Southwest of Buckeye, in Unit Letter E, Section 1, Township 18 South, Range 34 East in Lea County, New Mexico, on State Trust Land. On January 30, 2020, remediation activities commenced at the release site. During the course of remediation activities, a resilient calcrete layer was encountered at depths ranging from 18 in. to 4 ft. bgs. Repeated attempts to break through the resilient calcrete layer utilizing an excavator equipped with a trenching bucket and "frost tooth" yielded little results. Based on laboratory analytical results from delineation soil samples, depth to groundwater (100 Ft), and the presence of the resilient calcrete layer, Etech proposes excavating impacted topsoil affected above the NMOCD Reclamation Standard present within the release area to depths ranging from 18 in. to 4 ft. bgs (the resilient rock layer). Excavated material will be transported to the NMOCD-permitted facility for disposal. Due to the size of the affected area (>100,000 sq. ft.) and the abundance of delineation data, Etech requests an alternative sampling plan consisting of the collection of composite soil samples representing no more than every 500 sq. ft. In accordance with the NMOCD, additional discrete samples will be collected from any stained and/or moist.

Upon excavating impacted soil affected above the NMOCD Closure Criteria and/or the NMOCD Reclamation Standard (Pasture) to the maximum extent practicable, a layer of gypsum and/or Desalt® equivalent will be installed on the floor of the excavated area atop impacted soil affected above the NMOCD Closure Criteria and/or NMOCD Reclamation Standard. This control is designed to inhibit the upward migration of chloride remaining in-situ, protect the SAR of the overlying soil and promote revegetation. Upon installing the layer of gypsum and/or desalt equivalent, the excavated areas will be backfilled with locally sourced, non-impacted "like" material. The affected pasture area will be reseeded during the first favorable growing season following closure of the Site.

Based on laboratory analytical results from delineation soil samples and field soil sample results it is inferred this proposal still ensures the removal of impacted soil affected above the NMOCD Closure Criteria and the installation of a non-impacted topsoil horizon exceeding the current/original thickness. Etech maintains use of a hammer hoe or other mechanical means to remove the uppermost 4 Ft of impacted material affected above the NMOCD Reclamation Standard has effects on the natural geology/hydrology of the area and poses a risk to human health and safety that outweighs potential benefits.

Upon completion of remediation activities, a *Remediation Summary and Soil Closure Request* will be prepared detailing field activities and laboratory analytical results from confirmation soil samples. If you have any questions or need any additional information, please feel free to contact Jason Michelson or myself by phone or email. Thanks.

Respectfully,

Joel W. Lowry

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