

17 September 2015

Ms. Kellie Jones Environmental Specialist NMOCD 1625 North French Drive Hobbs, New Mexico 88240

RECEIVED

By JKeyes at 8:59 am, Oct 01, 2015

APPROVED By JKeyes at 8:59 am, Oct 01, 2015

RE: Remediation Progress Report and Closure Proposal Chevron – WDDU SE Trunkline UL-B, Section 32, Township 24 South, Range 38 East Lea County, New Mexico NMOCD Reference # 1RP-3649

Ms. Jones:

The following *Remediation Progress Report and Closure Proposal* serves as a condensed update on remedial activities undertaken and proposed closure for the above referenced Site.

Background Information:

Underground fiberglass trunkline ruptured causing 9.6 bbls of fluids spilled to land. Backhoe excavated top layer of soil approx. one (1) foot bgs.

Remediation Progress:

On June 3, 2015 EPI personnel mobilized at the site to collect soil samples to determine the vertical extent of contamination. Six (6) soil samples were collected from six (6) sample locations; SP1 – SP6. All samples were sent to Cardinal Labs in Hobbs, New Mexico for testing. Laboratory analytical results indicate Chloride concentrations in the excavation exceed NMOCD Recommended Remedial Action Levels (RRALs) of 1,000 mg/Kg in every sample except SP6 (reference *Table 2*).

Based on laboratory analytical results the excavation was deepened to approximately four (4) feet bgs in an attempt to remove Chloride impacted soil above NMOCD RRALs. To date approximately 680 cubic yards of contaminated soil have been excavated and hauled to a state approved facility for disposal.

On July 3, 2015 four (4) soil samples were collected from four (4) sample locations throughout the excavated area; SP1 – SP4. All samples were sent to Cardinal Labs in Hobbs, New Mexico for testing. Laboratory analytical results indicate Chloride concentrations do not exceed NMOCD RRALs (reference *Figure 3* and *Table 2*).



Closure Proposal:

Based on laboratory analytical results indicating Chloride concentrations in the excavation are below NMOCD RRALs, EPI proposes to backfill the excavated area with clean soil; soil will be free of deleterious material or rocks or large clumps.

Backfilling will continue until the entire excavation is closed. Upon completion of backfill activities, the entire disturbed area will be contoured to blend with existing pasture area and protected against wind/water erosion.

Following completion of closure activities, EPI will provide a detailed *Final Closure Report* to Chevron and NMOCD personnel. Chevron and EPI personnel would welcome an opportunity to briefly discuss the *Closure Proposal* at your earliest convenience. However, should you have any questions or concerns please feel free to contact me at (575) 394-3481 or via e-mail at <u>ddominguezepi@gmail.com</u> or Mr. Ricky Bates at (432) 528-1908 or via e-mail at <u>rbates@chevron.com</u>. All official communication should be addressed to:

Mr. Ricky Bates Chevron N.A. Exploration Production Co. P.O. Drawer 29 Andrews, Texas 79714

Sincerely,

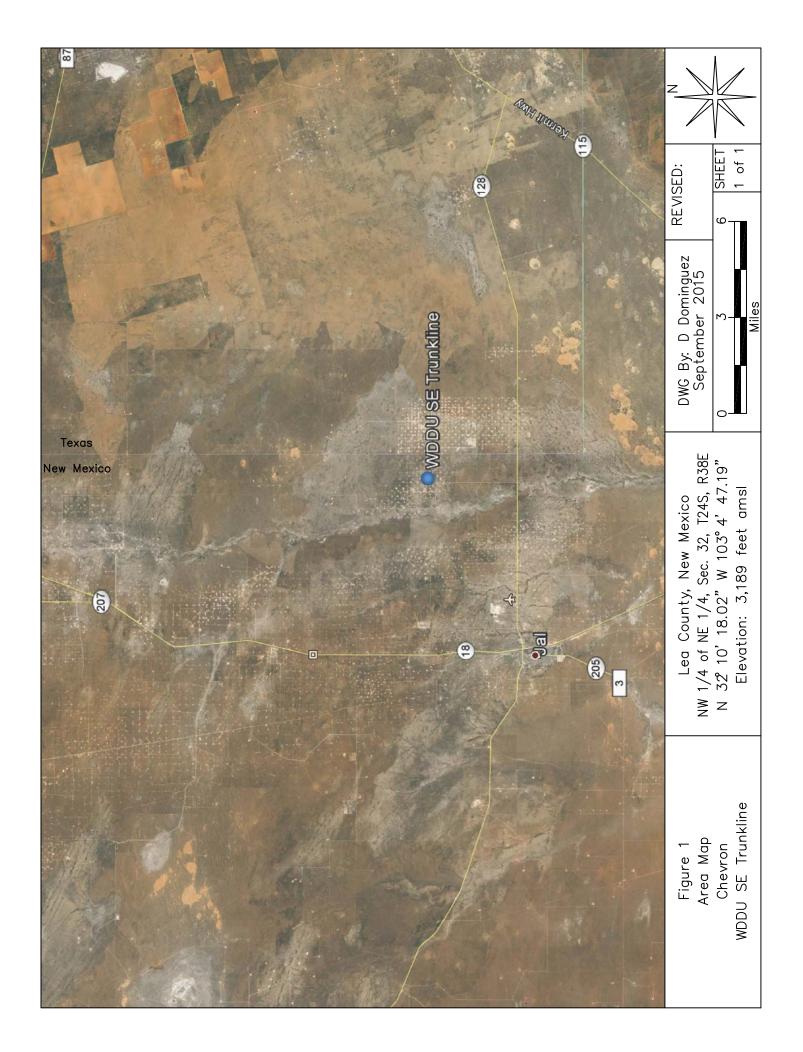
ENVIRONMENTAL PLUS, INC.

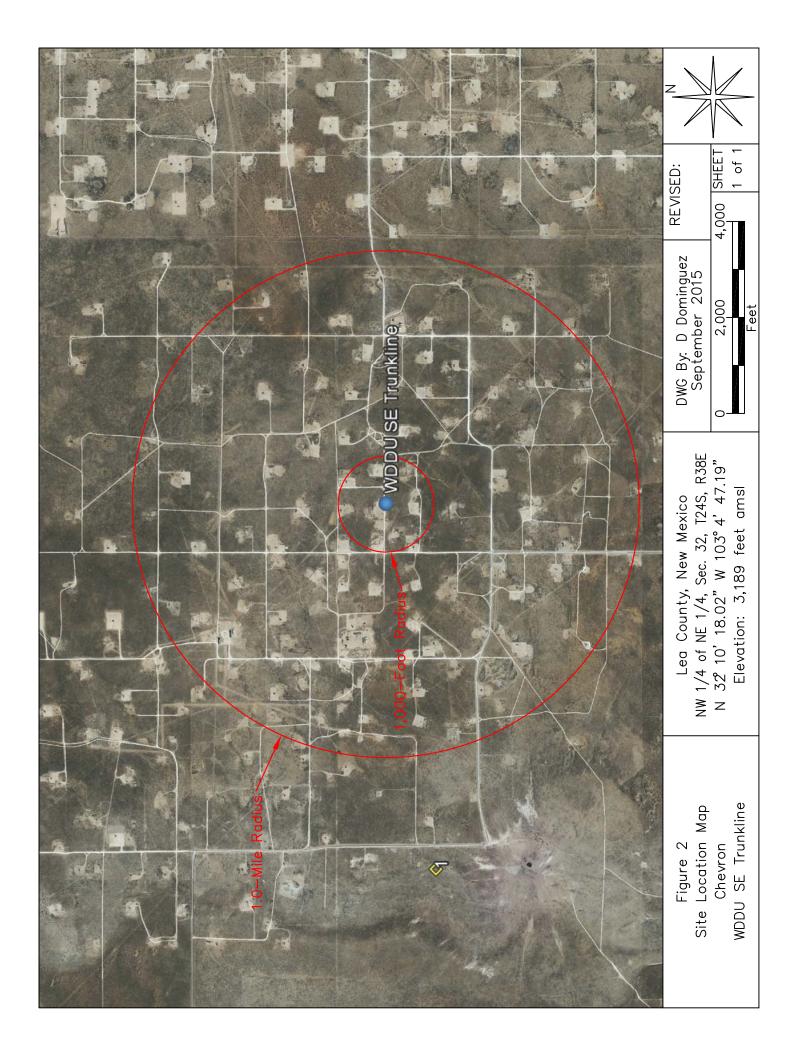
Daniel Dominguez Environmental Consultant

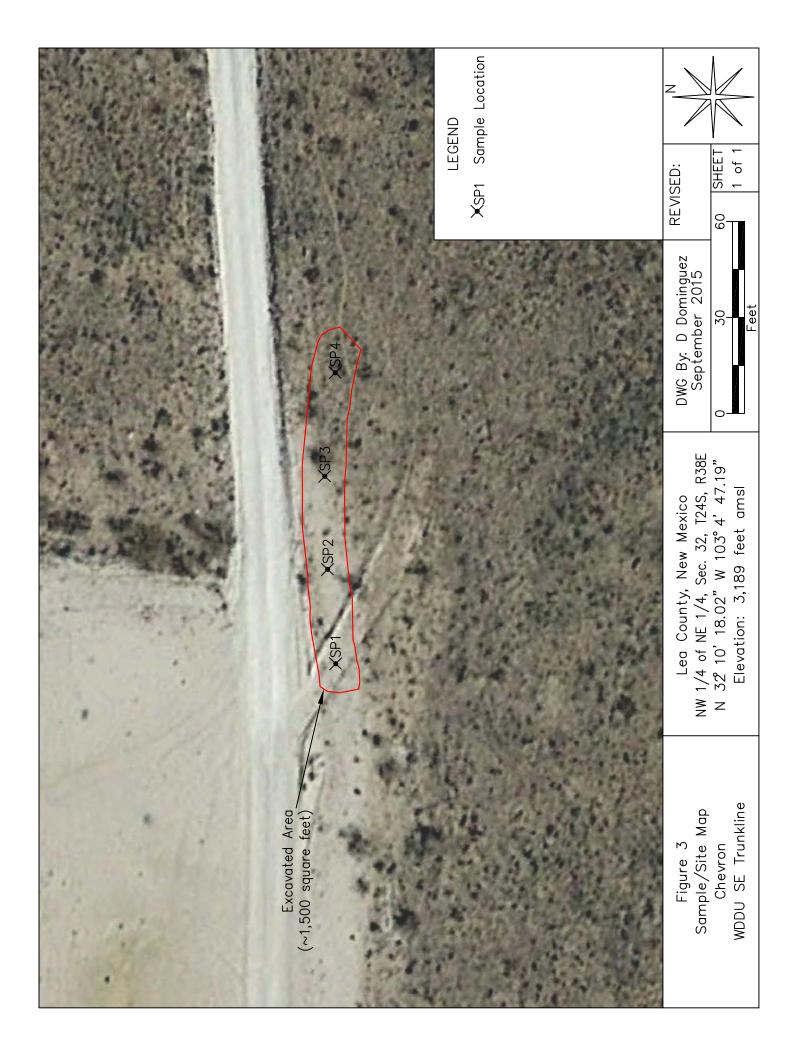
cc: Ricky Bates, Safety Specialist – Chevron, Dollarhide FMT File

Encl.: Figure 1 – Area Map
Figure 2 – Site Location Map
Figure 3 – Sample/Site Map
Table 1 – Well Data
Table 2 – Summary of Soil Sample Field Testing and Laboratory Analytical Results
Attachment I – Photographs
Attachment II – Laboratory Analytical Results
Attachment III – Copy of Initial NMOCD Form C-141

FIGURES







TABLES

TABLE 1

Well Data

Chevron - WDDU SE Trunkline

Ref#	Well Number	Use	Diversion ^A	Owner	q64	116 c	14 St	c Tws	p Rng	q64 q16 q4 Sec Twsp Rng Easting Northing	Northing	Date Surface Measured Elevation	Surface Elevation ^B	Depth to Water
							_							(ft bgs)
1	CP 00069	PMH	0	SKELLY OIL COMPANY	2	4	3 3	l 24S	38E	31 24S 38E 679087	3560776		3,112	

* = 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

 A = In acre feet per annum

 B = Elevation interpolated from USGS topographical map based on referenced location. PMH = Non 72-12-1 Multiple household use quarters are 1=NW, 2=NE, 3=SW, 4=SE; quarters are smallest to biggest

TABLE 2

Summary of Soil Sample Field Testing and Laboratory Analytical Results

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Soil Status Sample Date Reading (ppm)	Toluene Ethylbenzene Total To (mg/Kg) (mg/Kg) (mg/Kg) (mg	Total GRO BTEX C6-C10 (mg/Kg) (mg/Kg)	GRO DRO C6-C10 C10-C28 (mg/Kg) (mg/Kg)	Total TPH (mg/Kg) (mg/Kg)
03-Jun-15	-	1	I	3,520
03-Jun-15		1	1	10,900
03-Jun-15		1	!	5,680
03-Jun-15		1	1	4,160
03-Jun-15		1	1	34,400
03-Jun-15		I	ł	272
03-Jul-15		1	1	112
03-Jul-15		1	1	896
03-Jul-15		1	1	832
03-Jul-15		1	!	560
NMOCD Recommended Remedial Action Levels 100		02		5,000 1,000

- - = Not Analyzed Bold values are in excess of NMOCD Recommended Remedial Action Levels

ATTACHMENTS

ATTACHMENT I Photographs



Photograph #1 – Looking east across excavation



Photograph #2 – Looking east across excavation



Photograph #3 – Looking east across excavation



Photograph #4 – Looking east across excavation



Photograph #5 – Looking west across excavation

ATTACHMENT II Laboratory Analytical Results



June 10, 2015

Daniel Dominguez Environmental Plus, Inc. P.O. Box 1558 Eunice, NM 88231

RE: WDDU

Enclosed are the results of analyses for samples received by the laboratory on 06/03/15 14:30.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/ga/lab_accred_certif.html.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keine

Celey D. Keene Lab Director/Quality Manager



Analytical Results For:

Environmental Plus, Inc. Daniel Dominguez P.O. Box 1558 Eunice NM, 88231 Fax To: (505) 394-2601

Received:	06/03/2015	Sampling Date:	06/03/2015
Reported:	06/10/2015	Sampling Type:	Soil
Project Name:	WDDU	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	SOUTHEAST INJ TRUNK LINE		

Sample ID: SITL SP 1 (H501430-01)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	3520	16.0	06/09/2015	ND	416	104	400	3.77	

Sample ID: SITL SP 2 (H501430-02)

Chloride, SM4500Cl-B	mg/	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	10900	16.0	06/09/2015	ND	416	104	400	3.77	

Sample ID: SITL SP 3 (H501430-03)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	5680	16.0	06/09/2015	ND	416	104	400	3.77	

Sample ID: SITL SP 4 (H501430-04)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	4160	16.0	06/09/2015	ND	416	104	400	3.77	

Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Damages. 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 analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the sample identified above. This report shall not be reproduced except in full with written approval of Cardinal Loratories.

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



Analytical Results For:

Environmental Plus, Inc. Daniel Dominguez P.O. Box 1558 Eunice NM, 88231 Fax To: (505) 394-2601

Received:	06/03/2015	Sampling Date:	06/03/2015
Reported:	06/10/2015	Sampling Type:	Soil
Project Name:	WDDU	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	SOUTHEAST INJ TRUNK LINE		

Sample ID: SITL SP 5 (H501430-05)

Chloride, SM4500Cl-B	mg,	′kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	34400	16.0	06/09/2015	ND	416	104	400	3.77	

Sample ID: SITL SP 6 (H501430-06)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	272	16.0	06/09/2015	ND	416	104	400	3.77	

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



Notes and Definitions

- ND
 Analyte NOT DETECTED at or above the reporting limit

 RPD
 Relative Percent Difference
- ** Samples not received at proper temperature of 6°C or below.
- *** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager

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Page 1 of 2



August 06, 2015

Daniel Dominguez Environmental Plus, Inc. P.O. Box 1558 Eunice, NM 88231

RE: SOUTHWEST INJECTION LINE

Enclosed are the results of analyses for samples received by the laboratory on 08/03/15 15:23.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/ga/lab_accred_certif.html.

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Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keine

Celey D. Keene Lab Director/Quality Manager



Analytical Results For:

Environmental Plus, Inc. Daniel Dominguez P.O. Box 1558 Eunice NM, 88231 Fax To: (505) 394-2601

Received:	08/03/2015	Sampling Date:	08/03/2015
Reported:	08/06/2015	Sampling Type:	Soil
Project Name:	SOUTHWEST INJECTION LINE	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NONE GIVEN		

Sample ID: SP 1 (4') (H502006-01)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	08/06/2015	ND	416	104	400	0.00	

Sample ID: SP 2 (4') (H502006-02)

Chloride, SM4500Cl-B	mg/	'kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	896	16.0	08/06/2015	ND	416	104	400	0.00	

Sample ID: SP 3 (4') (H502006-03)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	832	16.0	08/06/2015	ND	416	104	400	0.00	

Sample ID: SP 4 (4') (H502006-04)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	560	16.0	08/06/2015	ND	416	104	400	0.00	

Cardinal Laboratories

*=Accredited Analyte

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



Notes and Definitions

- ND
 Analyte NOT DETECTED at or above the reporting limit

 RPD
 Relative Percent Difference
- ** Samples not received at proper temperature of 6°C or below.
- *** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager

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	Time 11:30 am	Date 8/3/15							SDA (A')	SP3 (4')	SP2 (4')	SP1 (4')	SAMPLE I.D.		e Heri Gaytan			Southwest Injection Line	Chevron	575-394-3481 / 575-394-2601	Eunice New Mexico 88231		ger Daniel Dominguez	Environmental Plus,	FAX: (575) 394-2601	1211 VII UILIILUULUU FIUS, INC.	south Directory	
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ATTACHMENT III Copy of Initial NMOCD Form C-141

* Attach Additional Sheets If Necessary

State of New Mexico Energy Minerals and Natural Resources

Form C-141 Revised August 8, 2011

Oil Conservation Division 1220 South St. Francis Dr.

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Name of Company: Chevron N.A. Exploration Production Co. Contact: Edem Sededji This RP will remain open Address; P.O. Drawer 29 Andrews TX 79714 Telephone No. 432-234-4437 inversitgation results are s Facility Name: WDDU SI: Tunkline Facility Type: Water Injection API No. 3002512328 Surface Owner: New Mexico Mineral Owner: New Mexico API No. 3002512328 LoCATION OF RELEASE LocCation OF RELEASE Unit Letter Section Township Range Feet from the North/South Line Feet from the 1980 Last/West Line County Lea B 32 24 Sec Feet from the 660 North/South Line Feet from the 1980 Last/West Line County Lea Surree of Release: Produced Water Volume of Release; 9.6 bbi Volume Recovered: 0 Date and Hour of Occurrence: 05/18/2015 06:00 PM Date and Hour Was Immediate Notice Given? Yes No If Yes, Volume Impacting the Watercourse. If Yes, Volume Impacting the Watercourse. Was a Watercourse Reached? Yes No If Yes, Volume Impacting the Watercourse. Describe Area Affected and Cleanup Action Taken.* Nearey of Release of Problem and Remedial Action Taken.* Nocon District 1 at 7:56 arn, May 27, 201)5	e. NM 875	Santa	ę	k .	a Fe. NM 87505	eis Dr., Santa	
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E-mail Address: etpo@ehevron.com Date: 05/26/2015 Phone: 432 -234-4437 Conditions of Approval: Site samples required. Delineate and remediate as per MNOCD guides. Geotag photographs of IRP-3649		es which may en the operator of inface water, hur bliance with any IVISION	derstand that purs ve actions for rele port" does not reli at to ground water sponsibility for co ERVATION ecialist:	hents. EPI will fur knowledge and u nd perform correc arked as "Final R on that pose a thr e the operator of the OIL CON Environmental S	the best of my notifications a he NMOCD m ate contaminat does not reliev Approved by	OCD TI omplete iin relea report b nd reme	e is true and co nd/or file certai ce of a C-141 r y investigate an	given above given above to report an e acceptane adequately OCD accep	for TPH and C d threshold. information g s are required t ironment. The have failed to addition, NMC aws and/or reg	ify that the all operators n or the environment. In e. or local la	Area affecte the laborator levels are ab I hereby cert regulations a public health should their or the enviro federal, state Signature: Printed Nam

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