



November 10, 2020

Bradford Billings
Hydrologist
District 2 Artesia
Oil Conservation Division
Santa Fe, NM 87505

**Subject: Letter of Understanding
1RP-1733
Central Vacuum Unit #049H Drill Pit Release
PLSS Unit Letter C, Section 31, Township 17 South, and Range 35 East
Lea County, New Mexico**

Mr. Billings:

On behalf of ConocoPhillips, Tetra Tech, Inc. (Tetra Tech) submits the following Letter of Understanding for review. This letter of understanding is intended to provide clarification, as well as the justification for a change of operator request on an open incident.

The release assigned the Remediation Permit (RP) number 1RP-1733 is associated with ConocoPhillips on the New Mexico Oil Conservation Division (NMOCD) online imaging system and is included in a list of releases included in an Agreed Compliance Order-Releases (ACO-R) entered between ConocoPhillips and NMOCD on May 9, 2019. Thus, ConocoPhillips is currently designated as the Responsible Party of Record for this incident.

However, online NMOCD documentation indicates this release occurred at a Site operated by Chevron USA (Chevron). Chevron is listed as the Operator at this well location since before the date of the release through the present day. It is unclear how the release incident came to be associated with ConocoPhillips.

The release site is the Chevron Central Vacuum Unit (CVU) #049H well (API No. 30-025-02958), located approximately 0.5 miles southeast of Buckeye in Lea County, New Mexico (Figure 1). The Operator for the API No. 30-025-02958 well is listed as Chevron USA Inc. The well is located in the Public Land Survey System (PLSS) Unit Letter C, Section 31 Township 17 South, and Range 35 East. The coordinates of the release area are 32.797186°, -103.499378°.

BACKGROUND

There is no State of New Mexico C-141 Initial Report on file in the NMOCD online imaging system for this release. The incident identification for this release is NPAC0801734938. This incident is listed on the OCD Permitting Well details page under the Chevron (30-025-02958) Central Vacuum Unit #049H.

The only documentation on file with NMOCD is a Remediation Proposal prepared for Chevron by Environmental Plus, Inc. and dated July 18, 2007 (Attachment A). According to this report, an initial C-144 (*Pit. Closed-Loop System, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application*) was submitted for the CVU #049H well drill pit on January 10, 2006. The Remediation Proposal was submitted to supplement the Method of Closure noted on the C-144, and includes site background information, a site diagram, analytical data, and the remediation proposal.

TETRA TECH

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Bradford Billings
NMOCD
November 10, 2020

The NMOCD online well details for API No. 30-025-02958 indicate that the well is operated by Chevron. Prior to 2002, the well was operated by Texaco Exploration & Production, Inc. There are no records available that indicate that ConocoPhillips has ever operated the CVU #049H well.

CONCLUSION

After review of the available information on the NMOCD imaging website, the 1RP-1733 release appears to be mistakenly associated with ConocoPhillips as a result of a clerical error. Therefore, ConocoPhillips respectfully requests that the NMOCD disassociate the 1RP-1733 from ConocoPhillips and remove it from the May 9, 2019 ACO.

The state of any ongoing corrective action/remediation at the site is unknown to ConocoPhillips representatives at this time. This letter of understanding will serve as documentation for this release incident as ConocoPhillips should not be considered the Responsible Party of record for 1RP-1733, but rather Chevron USA, Inc.

Should you have any questions or comments regarding this letter, please do not hesitate to contact me by telephone at 512-338-2861 or by email at christian.llull@tetrattech.com.

Sincerely,



Christian M. Llull
Project Manager
Tetra Tech, Inc.

cc:
Mr. Charles Beauvais, GBPU – ConocoPhillips
Mr. Marvin Soriwei, RMR – ConocoPhillips

Bradford Billings
NMOCD
November 10, 2020

LIST OF ATTACHMENTS

Figure 1 – Site Location Map

Attachment A – NMOCD Online Documentation

FIGURES



DOCUMENT PATH: D:\CONOCOPHILLIPS\MXD\FIGURE 1 SITE LOCATION_1RP-1733.MXD



TETRA TECH

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CONOCOPHILLIPS

1RP-1733

(32.797186°, -103.499378°)
LEA COUNTY, NEW MEXICO

**CENTRAL VACUUM UNIT #049H DRILLING PIT RELEASE
SITE LOCATION MAP**

PROJECT NO.: 212C-MD-02152

DATE: JUNE 24, 2020

DESIGNED BY: AAM

Figure No.

1

ATTACHMENT A
NMOCD Online Documentation

REMEDIATION PROPOSAL

CENTRAL VACUUM UNIT (CVU) #49

EPI REF: 200061

API #30-025-02958

UL-C (NE $\frac{1}{4}$ OF THE NW $\frac{1}{4}$) OF SECTION 31, T17S, R35E

~ 0.5 MILES SOUTHEAST OF BUCKEYE,

LEA COUNTY, NEW MEXICO

LATITUDE: N 32° 47' 49.87"

LONGITUDE: W 103° 29' 57.76"

JULY 2007

PREPARED BY:

**ENVIRONMENTAL PLUS, INC.
2100 AVENUE O
EUNICE, NEW MEXICO 88231**

PREPARED FOR:



RP# 1733



ENVIRONMENTAL PLUS, INC.

CONSULTING AND REMEDIAL CONSTRUCTION

18 July 2007

Mr. Larry Johnson
 Environmental Engineer
 New Mexico Oil Conservation Division
 1625 North French Drive
 Hobbs, New Mexico 88240

RE: Remediation Proposal
 Chevron USA – Central Vacuum Unit (CVU) #49
 UL-C NE ¼ of the NW ¼ Section 31, T 17 S, R 35 E
 Latitude: 32° 47' 49.87"N; Longitude: 103° 29' 57.76"W
 API #30-025-02958; EPI Ref. #200061

Dear Mr. Johnson:

On behalf of Chevron USA, Environmental Plus, Inc., (EPI) submits the following Remediation Proposal to supplement Method of Closure procedure as noted on the Initial NMOCD Form C-144 submitted 10 January 2006.

Site Background

The Site is located in UL-C NE ¼ of the NW ¼ of Section 31, T17S, R35E at an elevation of approximately 3,983 feet above mean sea level (amsl). The property is owned by the State of New Mexico and managed by the New Mexico State Land Office (NMSLO). A search for water wells was completed utilizing the New Mexico Office of the State Engineers website and a database maintained by the United States Geological Survey (USGS). Groundwater data taken from domestic and USGS water wells within a one (1) mile radius indicates an average water depth of approximately 105 feet below ground surface (bgs). Based on available information, it was determined the distance between impacted soil and groundwater is approximately 100 vertical feet. Two (2) water wells exist within a 1,000-foot radius of the site. No surface water features exist within a 1,000-foot radius of the site. Utilizing this information, New Mexico Oil Conservation Division (NMOCD) Remedial Goals for this Site were determined as follows:

Parameter	Remedial Goal
Benzene	10 parts per million
BTEX	50 parts per million
TPH	100 parts per million

*Chloride and sulfate residuals may not be capable of impacting local Groundwater above NMWQCC Standard of 250 mg/L and 600 mg/L, respectively

P.O. BOX 1558

2100 AVENUE O

EUNICE, NEW MEXICO 88231

TELEPHONE 505-394-3481

FAX 505-394-2601

ENVIRONMENTAL PLUS, INC.



Field Work

EPI performed site assessment, GPS and photographed the drill pit site on 19 December 2005. On 25 January 2006 EPI mobilized to the site and commenced stiffening drilling mud in the drill pit. After the drilling mud was sufficiently stiffened, the material was loaded and transported to Sundance Services, Inc., for disposal. After disposal of the drilling mud was complete, excavation of the drill pit sidewalls and bottom was undertaken in areas where chloride concentrations exceeded remedial threshold goals. From 25 – 31 January 2006, approximately 606 cubic yards of drilling mud and impacted soil were transported to the disposal facility. On 25 and 26 of January EPI analyzed in the field twenty-one (21) soil samples collected from the bottom and sidewalls of the excavation for chloride concentrations. Ten (10) soil samples collected on 19 October 2006 were analyzed in the field for chloride concentrations. Select soil samples were remitted to an independent laboratory for analyses of BTEX (2 ea.), TPH (2 ea.) and chloride (10 ea.) concentrations. EPI re-mobilized to the drill pit and started excavation of impacted soil on 11 January 2006. Impacted soil excavated on 11-12 January 2007 was stockpiled on the job site. Nine (9) soil samples collected on 12 January 2007 were analyzed in the field and five (5) in an independent laboratory for chloride concentrations. Field activities ceased on 12 January 2007 despite knowledge high chloride concentrations existed in the excavation sidewalls (reference *Table 2*).

Analytical Data

On 19 October 2006 laboratory analytical tests were conducted for BTEX and TPH concentrations on two (2) of the ten (10) soil samples collected from sidewalls. Laboratory analytical data confirmed BTEX and TPH concentrations were non detectable (ND) at or above laboratory analytical method detection limits (MDL) for both soil samples. Chloride concentrations on ten (10) soil samples collected from the sidewalls ranged from 48 mg/Kg (SW3SSE-1') to 1,360 mg/Kg (SW6NN-1'). Chloride concentrations above remedial threshold goals of 250 mg/Kg existed in six (6) of the ten (10) soil samples (reference *Figure 6*). Five (5) soil samples collected on 12 January 2007 were analyzed for chloride concentrations. Laboratory analytical data indicated chloride concentrations ranged from 656 mg/Kg (SSW-5 @ 6") to 4,800 mg/Kg (SSW-4 @ 6').

Site Remedial Proposal

Prior to initiation of remedial activities, the abandoned steel line traversing the excavation needs to be removed and capped at both ends. Based on field analyses and laboratory analytical results, soils within the drill pit excavation bottom and sidewalls are chloride impacted. Residual chlorides existing in the excavation bottom range from 288 mg/Kg (BH1W-2') to 464 mg/Kg (BH2E-2'). These chloride concentrations are slightly elevated above remedial threshold goals of 250 mg/Kg and pose little potential threat for groundwater contamination. However, residual chloride concentrations in the sidewalls are elevated above remedial threshold goals. In view of this, it is recommended impacted soil remaining in situ in the drill pit bottom be excavated a minimum depth of 5-feet bgs. Dependent on chloride concentrations determined by analyses in the field and verified by laboratory analytical data, two (2) courses of action can be undertaken. Should chloride impacts remain in concentrations at or slightly above remedial threshold goals, no additional remedial action will be required. If chloride impacts indicate elevated concentrations, the excavation bottom will be covered with a 20-mil polyethylene liner sandwiched between one (1) foot layers of cushion



material. Cushion material can be either sand or clean topsoil free of deleterious ingredients, rocks and large clumps. Primary goal is excavation of sidewalls until chloride concentrations are below 250 mg/Kg, if possible. However, certain limitations to sidewall width excavations must be imposed as excessive excavation may prove to be neither performance nor cost effective. EPI proposes a maximum width of two (2) horizontal feet be initiated with field analyses of soil samples for chloride concentrations. Should chloride impacts indicate a rapid decrease in concentration, excavation will continue until remedial threshold goals are met. If the sidewalls indicate protracted excavation is needed to achieve remedial threshold goals, the drill pit may become a "risk based closure" candidate. In view of vertical separation between bottom of the excavation (~5 feet bgs) and projected groundwater (~105 feet bgs), migration of elevated chloride concentrations would dissipate sufficiently to prevent groundwater impacts.. Additionally, the polyethylene barrier will retard surface water from precipitating migration of in situ chlorides. Existing stockpiled and excavated impacted material will be transported to a state approved disposal facility. Upon completion of excavation and installation of the 20-mil polyethylene liner, the remaining portion of the excavation will be backfilled with clean topsoil from top of cushion material to original ground surface. The entire disturbed area will be contoured for natural drainage. Using NMSLO procedures and preferred grass mixture, the area will be disked and seeded.

Should you have any technical questions or concerns, please contact me at (505) 394-3481 or via email at dduncan@envplus.net. Official correspondence should be submitted to Mr. James Duke, Chevron USA, at (505) 394-1201 (office), (505) 390-7225 (cellular) or via email at lduk@chevron.com.

Sincerely,

ENVIRONMENTAL PLUS, INC.

David P. Duncan
Civil Engineer

Cc: Jim Duke, New Mexico Construction Representative, Chevron USA
Tejay Simpson, Operations Supervisor, Chevron USA
Larry Ridenour, Operations Representative, Chevron USA
Thaddeus Kostrubala, Environmental Engineer, NMSLO-Santa Fe, NM
Myra Meyers, District Resources Manager, NMSLO – Hobbs, NM

Encl: Figure 1 – Area Map
Figure 2 – Site Location Map
Figure 3 – Site Map
Figure 4 – Groundwater Gradient Map
Figure 5 – Soil Boring/Chloride Analytical Map
Figure 6 – Soil Sample/Chloride Analytical Ma



Table 1 – Well Data

Table 2 - Summary of Excavation Soil Sample Laboratory Analytical Results

Table 3 – Summary of Soil Boring Field Analyses and Laboratory Analytical Results

Attachment I – Site Photographs

Attachment II – Laboratory Analytical Results and Chain-of-Custody Form

Attachment III – Copy of Initial NMOCD Form C-144

ENCLOSURES

FIGURES

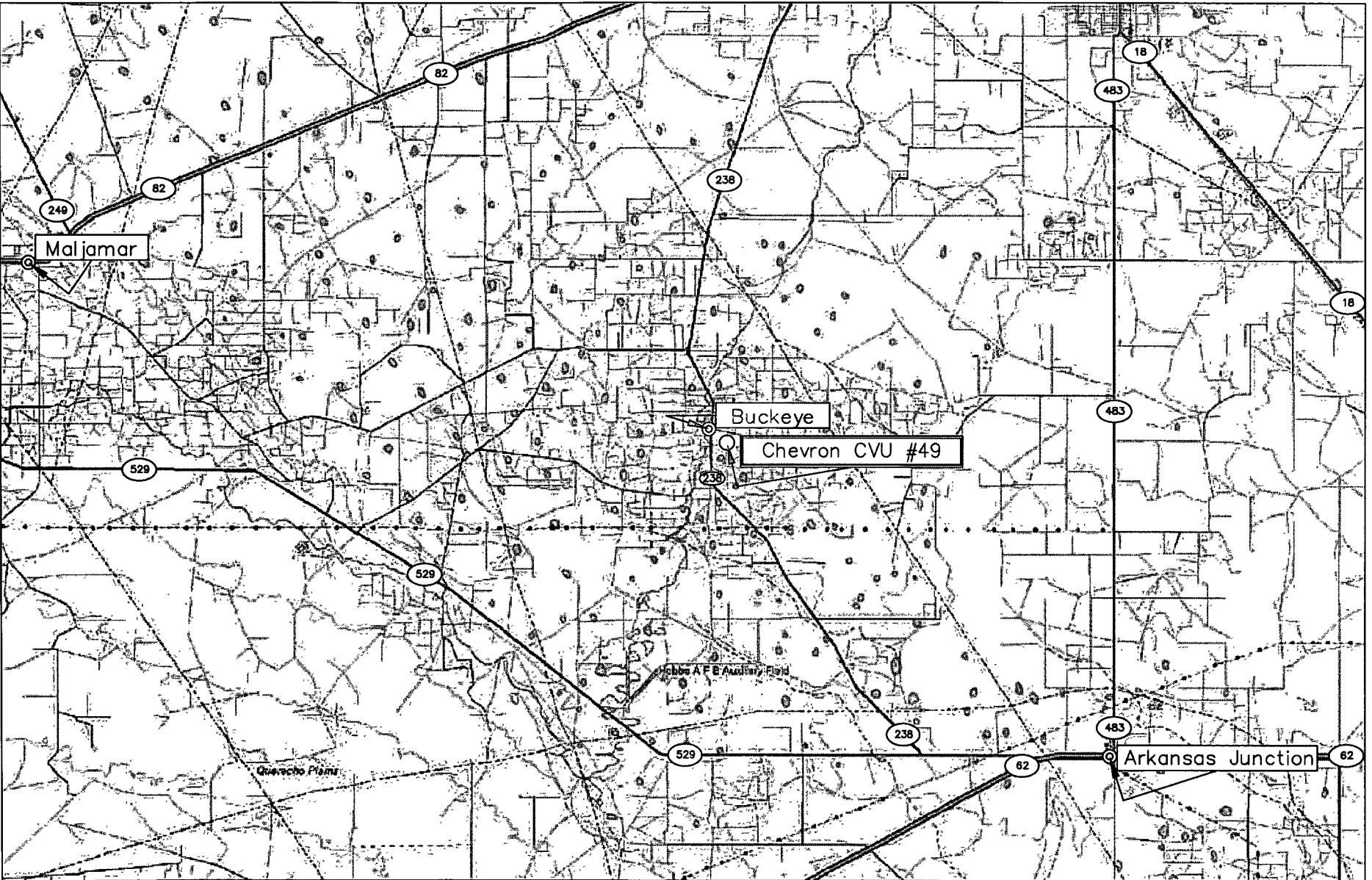
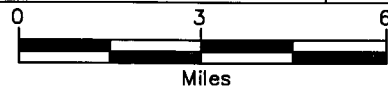


Figure 1
Area Map
Chevron Corporation
CVU #49

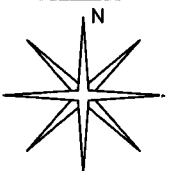
Lea County, New Mexico
NE 1/4 of the NW 1/4, Sec. 31, T17S, R35E
N 32° 47' 49.87" W 103° 29' 57.76"
Elevation: 3,983 feet amsl

DWG By: Daniel Dominguez
December 2005

REVISED:



SHEET
1 of 1



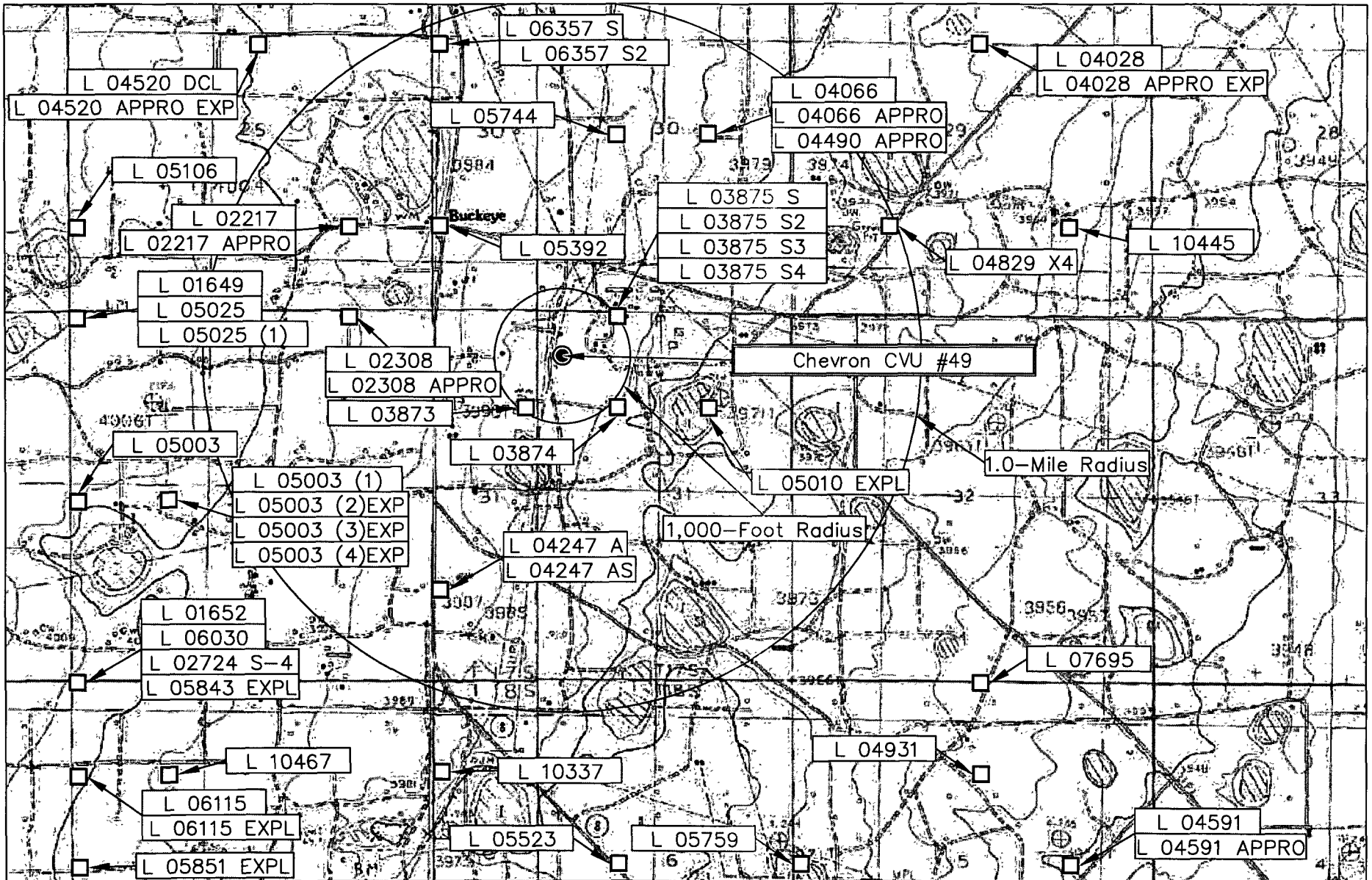
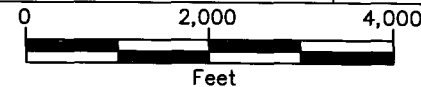


Figure 2
Site Location Map
Chevron Corporation
CVU #49

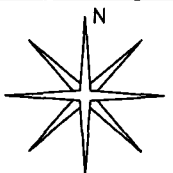
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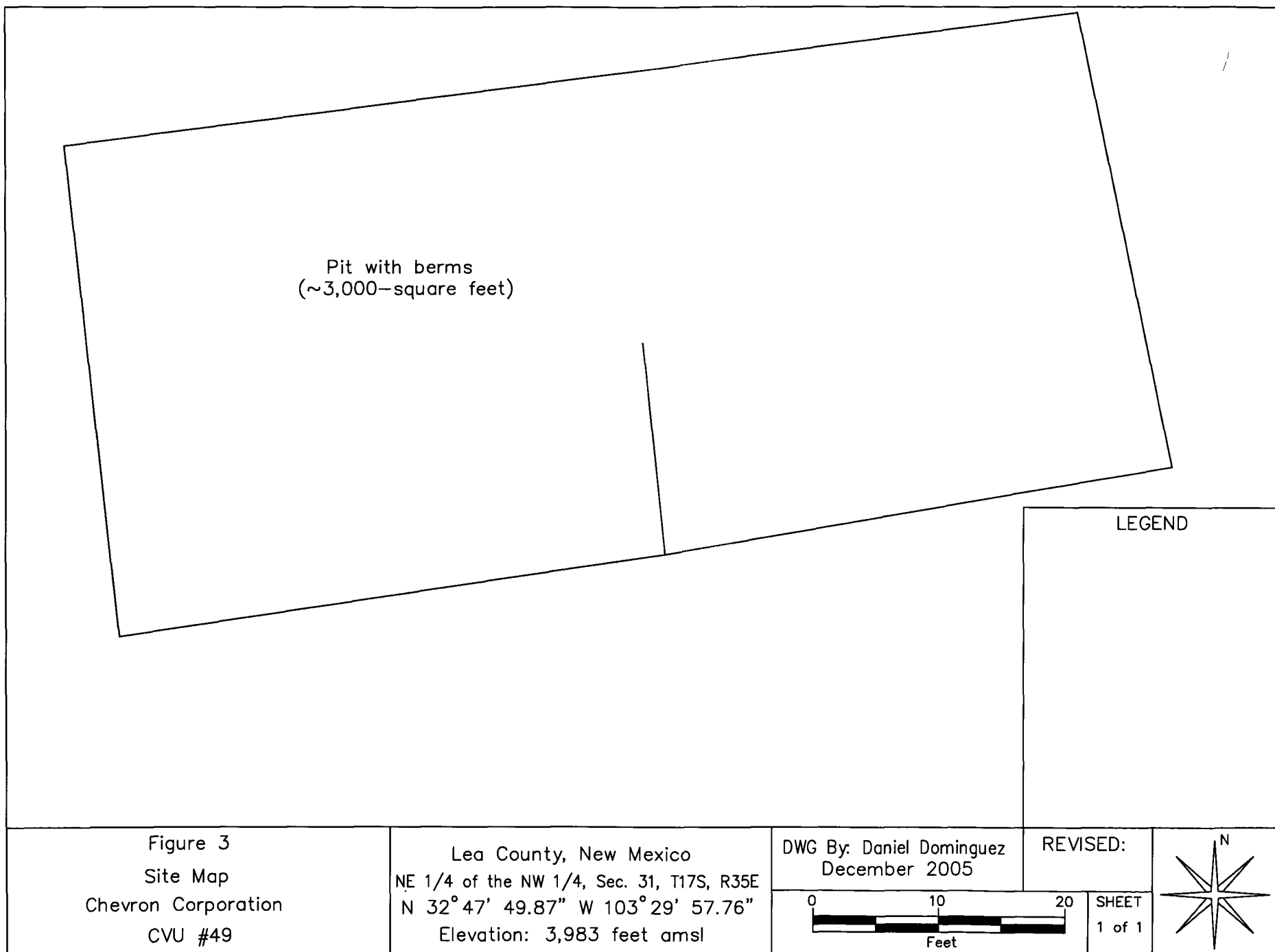
DWG By: Daniel Dominguez
December 2005

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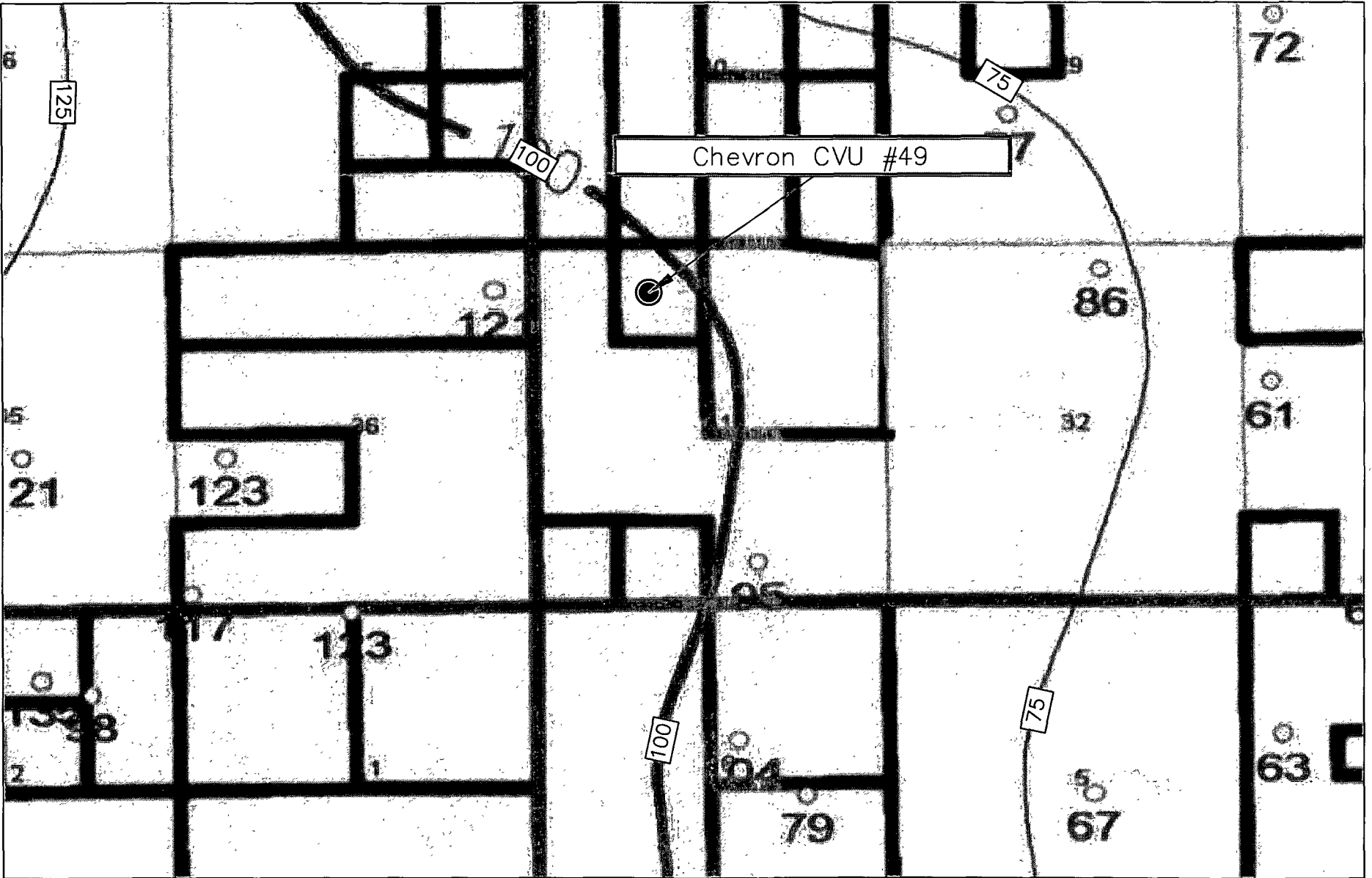
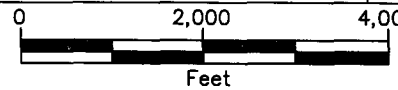


Figure 4
Groundwater Gradient Map
Chevron Corporation
CVU #49

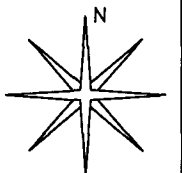
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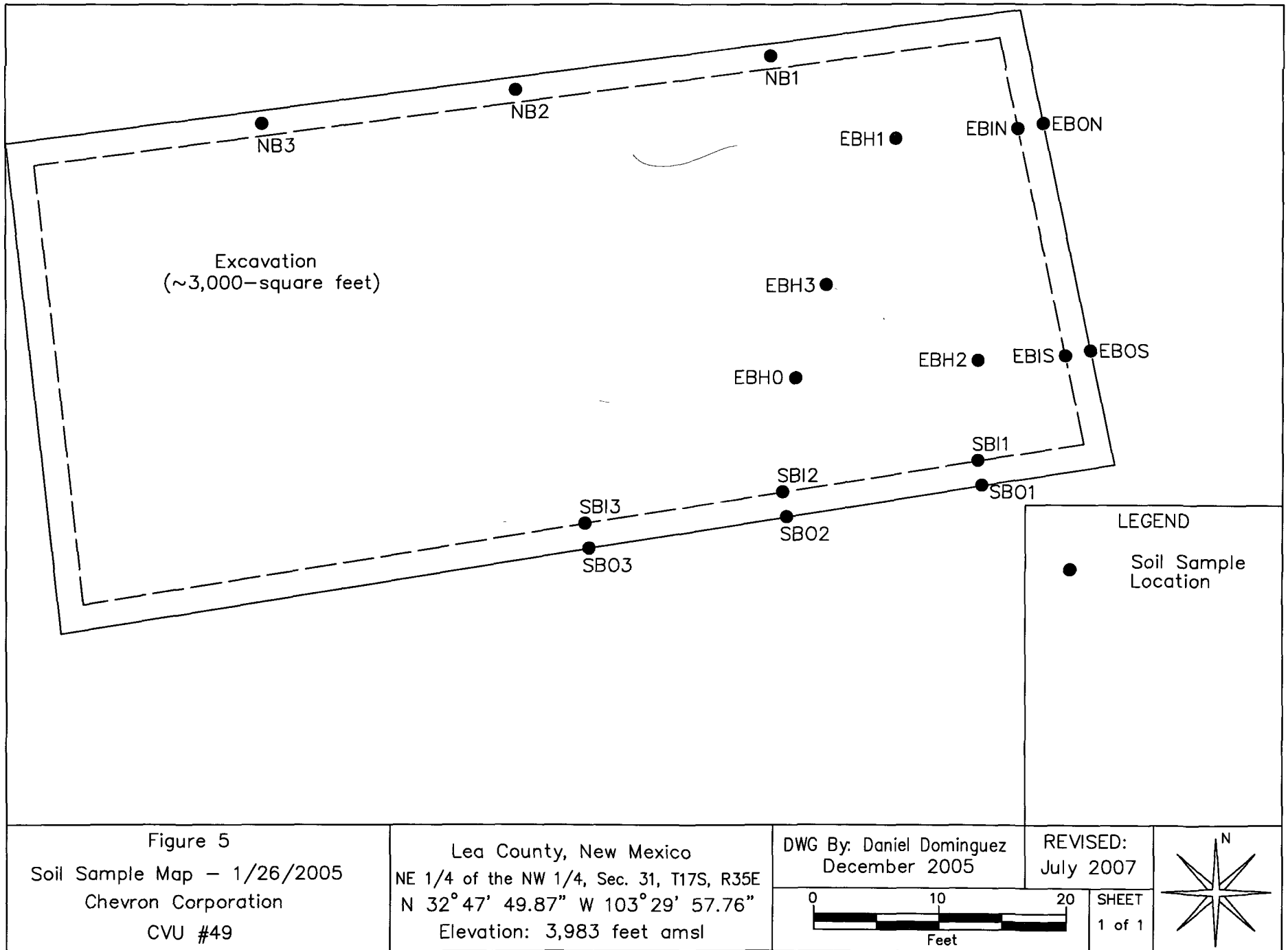
DWG By: Daniel Dominguez
December 2005

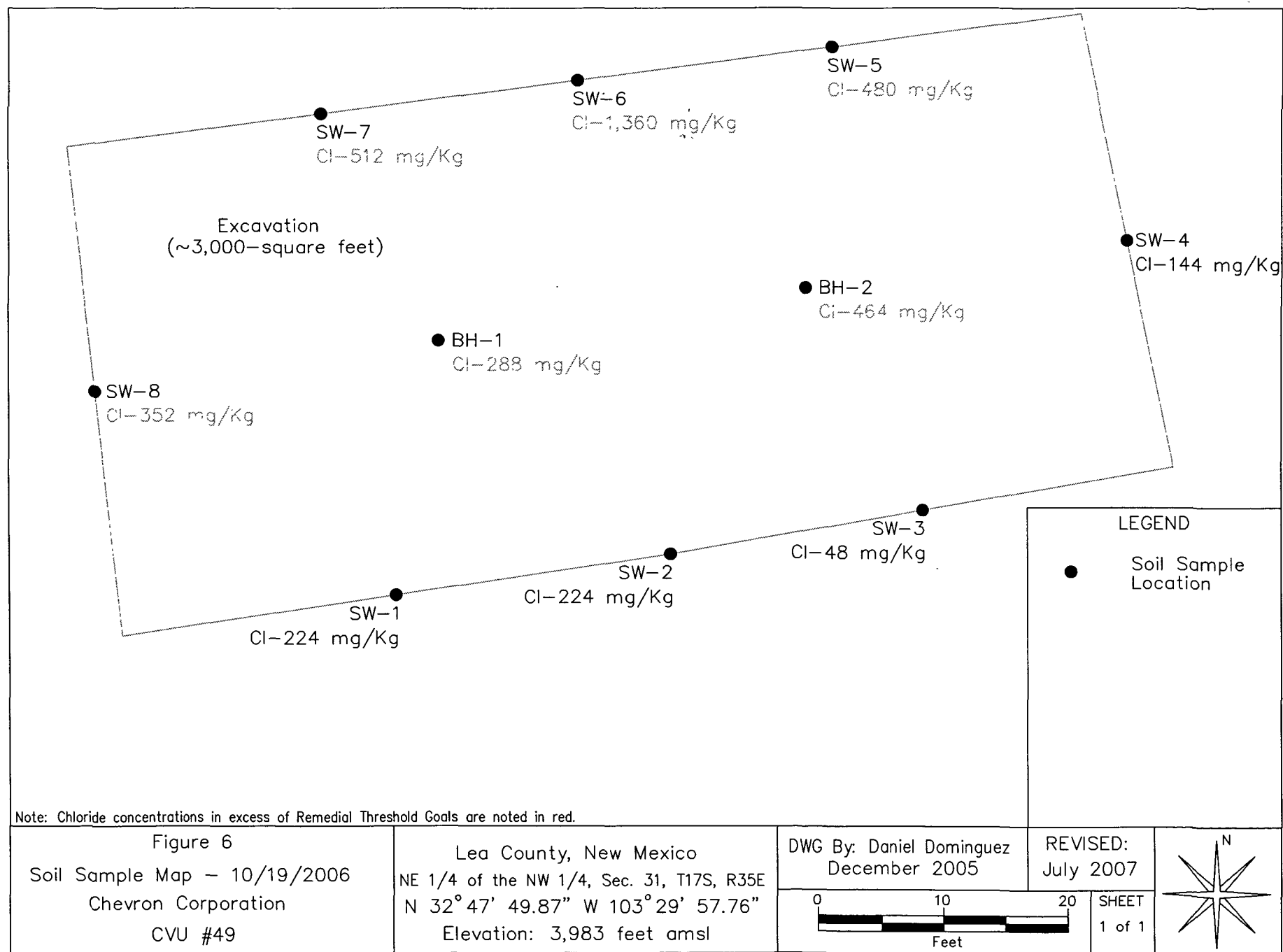
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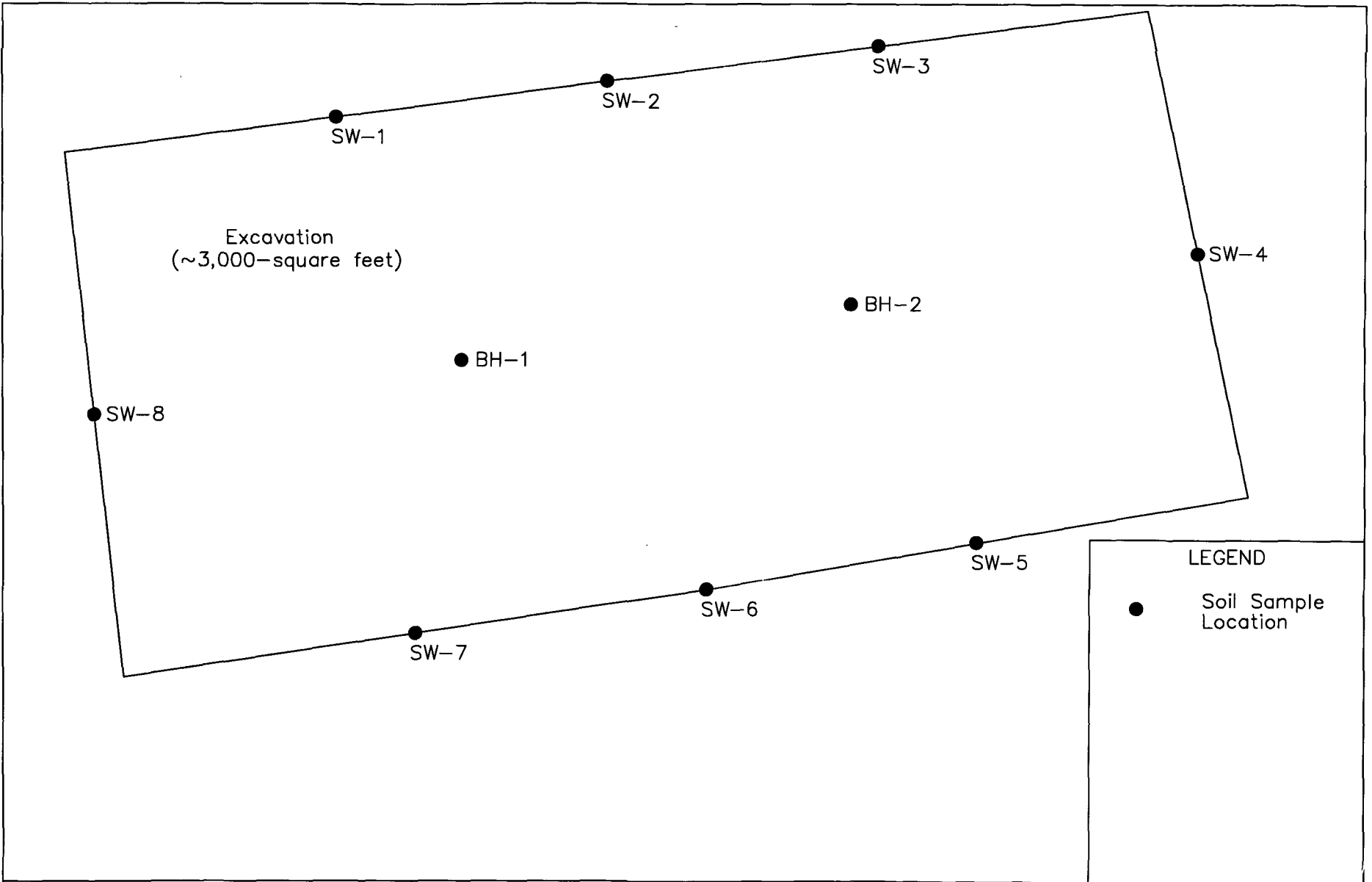
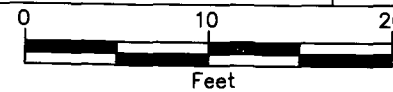


Figure 6
Soil Sample Map – 10/19/2006
Chevron Corporation
CVU #49

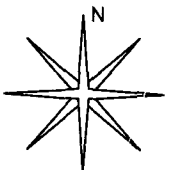
Lea County, New Mexico
NE 1/4 of the NW 1/4, Sec. 31, T17S, R35E
N 32° 47' 49.87" W 103° 29' 57.76"
Elevation: 3,983 feet amsl

DWG By: Daniel Dominguez
December 2005

REVISED:
July 2007



SHEET
1 of 1



TABLES

TABLE 1
WELL INFORMATION REPORT*
Chevron CVU #49 - (Ref #200061)

Well Number	Diversion ^A	Owner	Use	Twsp	Rng	Sec q q q	Latitude	Longitude	Date Measured	Surface Elevation ^B	Depth to Water (ft bgs)
L 03873	31.68	PHILLIPS PETROLEUM CO.	IND	17S	35E	31 1 2 3	N32° 47' 42.18"	W103° 30' 3 44"		3,986	
L 03874	23 67	PHILLIPS PETROLEUM CORP.	IND	17S	35E	31 2 1 3	N32° 47' 42.18"	W103° 29' 47.86"		3,983	
L 04247 A	1400	INTREPID MINING NM LLC	IND	17S	35E	31 3 1 3	N32° 47' 16.01"	W103° 30' 18.04"	25-Jan-74	3,993	95
L 04247 AS				17S	35E	31 3 1 2	N32° 47' 16.01"	W103° 30' 18.04"	09-Jul-90	3,993	117
L 05010 EXP	0	NOBLE DRILLING CO.	PRO	17S	35E	31 2 2	N32° 47' 42.15"	W103° 29' 32.29"		3,976	
L 04028	3	ZAPATA PETROLEUM CORPORATION	PRO	17S	35E	29 2 1	N32° 48' 34.50"	W103° 28' 45.96"		3,973	
L 04028 APPRO EXP				17S	35E	29 2 1	N32° 48' 34.50"	W103° 28' 45.96"		3,973	
L 04829 X4	317	PHILLIPS PETROLEUM COMPANY	OIL	17S	35E	29 3 2	N32° 48' 8 33"	W103° 29' 1.36"		3,976	
L 10445	0	GILES LEE	STK	17S	35E	29 4 2 4	N32° 48' 8.14"	W103° 28' 30.39"		3,967	
L 03875 S	0	DUKE ENERGY FIELD SERVICES, LP	POL	17S	35E	30 4 3 3	N32° 47' 55.30"	W103° 29' 47.88"		3,986	
L 03875 S2	0	DUKE ENERGY FIELD SERVICES, LP	POL	17S	35E	30 4 3 3	N32° 47' 55.30"	W103° 29' 47.88"		3,986	
L 03875 S3	0	DUKE ENERGY FIELD SERVICES, LP	POL	17S	35E	30 4 3 4	N32° 47' 55.30"	W103° 29' 47.88"		3,986	
L 03875 S4	0	DUKE ENERGY FIELD SERVICES, LP	POL	17S	35E	30 4 3 3	N32° 47' 55.30"	W103° 29' 47.88"		3,986	
L 04066	3	GACKLE DRILLING COMPANY	PRO	17S	35E	30 2 4	N32° 48' 21.55"	W103° 29' 32.41"	03-Feb-59	3,987	70
L 04066 APPRO				17S	35E	30 2 4	N32° 48' 21.55"	W103° 29' 32.41"	03-Feb-59	3,987	70
L 04490 APPRO	0	MORAN OIL PRODUCING & DRILLING	PRO	17S	35E	30 2 4	N32° 48' 21.55"	W103° 29' 32.41"	25-Jul-60	3,986	70
L 05392	0	INC. A.W. THOMPSON	PRO	17S	35E	30 3 1	N32° 48' 8 38"	W103° 30' 18.09"	16-May-64	3,996	80
L 05744	0	TRI-SERVICE DRILLING COMPANY	PRO	17S	35E	30 2 3 3	N32° 48' 21.53"	W103° 29' 47.94"		3,993	75
L 06357 S	207 8	REPUBLIC FACTORS INC. OF MIDLA	COM	17S	35E	30 1 1 3	N32° 48' 34.57"	W103° 30' 18 13"		3,996	
L 06357 S2				17S	35E	30 1 1 3	N32° 48' 34.57"	W103° 30' 18.13"	20-Jun-89	3,996	130
L 07695	480	PHILLIPS PETROLEUM COMPANY	OIL	17S	35E	32 4 3	N32° 47' 2 60"	W103° 28' 45.63"		3,963	
L 01649	0	CROSS LABORATORIES, INC.	DOM	17S	34E	25	N32° 47' 55.05"	W103° 31' 19.88"		4,012	
L 02217	3	FIRST BAPTIST CHURCH	DOM	17S	34E	25 4 2	N32° 48' 8 32"	W103° 30' 33 54"	10-Jun-53	3,999	75
L 02217 APPRO				17S	34E	25 4 2	N32° 48' 8.32"	W103° 30' 33.54"	10-Jun-53	3,999	75
L 02308	3	CHURCH OF CHRIST	DOM	17S	34E	25 4 4	N32° 47' 55.22"	W103° 30' 33.52"	12-Aug-53	3,999	76
L 02308 APPRO				17S	34E	25 4 4	N32° 47' 55.22"	W103° 30' 33 52"	12-Aug-53	3,999	76
L 04520 APPRO EXP	0	SOCONY MOBIL OIL COMPANY INC.	IND	17S	34E	25 2 1 3	N32° 48' 34.45"	W103° 30' 49.00"		4,006	
L 04520 DCL				17S	34E	25 2 1 3	N32° 48' 34.45"	W103° 30' 49 00"		4,006	
L 05025	0	TRI-SERVICE DRILLING COMPANY	PRO	17S	34E	25 3 3	N32° 47' 55.05"	W103° 31' 19.88"	21-Dec-62	4,012	95
L 05025 (1)	0	TRI-SERVICE DRILLING COMPANY	PRO	17S	34E	25 3 3	N32° 47' 55.05"	W103° 31' 19.88"		4,012	
L 05106	0	NOBLE DRILLING COMPANY	PRO	17S	34E	25 3 1	N32° 48' 8.14"	W103° 31' 19 88"	15-Apr-63	4,011	95
L 01652	0	CROSS LABORATORIES, INC	DOM	17S	34E	36	N32° 47' 2.72"	W103° 31' 19.90"		4,009	
L 02724 S-4	2410	INTREPID MINING NM LLC	IND	17S	34E	36 3 3 3	N32° 47' 2.72"	W103° 31' 19.90"		4,009	
L 05003	0	BRAHANEY DRILLING CO.	PRO	17S	34E	36 1	N32° 47' 28 89"	W103° 31' 19.89"	28-Nov-62	4,008	105
L 05003 (1)	0	BRAHANEY DRILLING COMPANY	PRO	17S	34E	36 1 4	N32° 47' 28 94"	W103° 31' 4.43"		4,006	
L 05003 (2) EXP	0	BRAHANEY DRILLING COMPANY	PRO	17S	34E	36 1 4	N32° 47' 28 94"	W103° 31' 4 43"		4,006	
L 05003 (3) EXP	0	BRAHANEY DRILLING COMPANY	PRO	17S	34E	36 1 4	N32° 47' 28.94"	W103° 31' 4.43"		4,006	
L 05003 (4) EXP	0	BRAHANEY DRILLING COMPANY	PRO	17S	34E	36 1 4	N32° 47' 28.94"	W103° 31' 4.43"		4,006	
L 05843 EXPL	0	KERMAC POTASH COMPANY	EXP	17S	34E	36 3	N32° 47' 2 72"	W103° 31' 19 90"	26-Jan-66	4,009	
L 06030	3	INC TEXACO	PRO	17S	34E	36 3 3	N32° 47' 2 72"	W103° 31' 19 90"	05-Oct-66	4,009	102
L 05851 EXPL	0	KERMAC POTASH COMPANY	EXP	18S	34E	01 1	N32° 46' 36.30"	W103° 31' 19.69"	28-Jan-66	4,002	
L 06115	3	TEXACO INC.	EXP	18S	34E	01 1 1 1	N32° 46' 49.35"	W103° 31' 19 80"	10-Mar-67	4,006	110
L 06115 EXPL				18S	34E	01 1 1 1	N32° 46' 49.35"	W103° 31' 19.80"	10-Mar-67	4,006	110

TABLE 1
WELL INFORMATION REPORT*
Chevron CVU #49 - (Ref #200061)

Well Number	Diversion ^A	Owner	Use	Twsp	Rng	Sec q q q	Latitude	Longitude	Date Measured	Surface Elevation ^B	Depth to Water (ft bgs)
L 10467	3	TEXACO E & P	SAN	18S	34E	01 1 2 2	N32° 46' 49.47"	W103° 31' 4.35"	01-Feb-95	3,999	115
L 04591	3	SHARP DRILLING COMPANY	PRO	18S	35E	05 2 4	N32° 46' 36.43"	W103° 28' 30.11"	01-Feb-61	3,954	75
L 04591 APPRO				18S	35E	05 2 4	N32° 46' 36.43"	W103° 28' 30.11"	01-Feb-61	3,954	75
L 04931	0	MOBIL OIL CORPORATION	SRO	18S	35E	05 2 1	N32° 46' 49.55"	W103° 28' 45.61"	07-Mar-81	3,963	70
L 05759	0	PHILLIPS PET. CO.	PRO	18S	35E	05 1 3	N32° 46' 36.60"	W103° 29' 16.56"		3,970	
L 05523	0	MARCUM DRILLING COMPANY	PRO	18S	35E	06 2 3	N32° 46' 36.67"	W103° 29' 47.72"	07-Jan-65	3,983	85
L 10337	0	MARATHON OIL COMPANY	PRO	18S	35E	06 1 1 4	N32° 46' 49.83"	W103° 30' 17.99"	07-Jul-93	3,986	110
L 01644	0	CROSS LABORATORIES INC.	DOM	18S	34E	11 1 1	N32° 46' 10.18"	W103° 31' 19.51"		4,003	
L 04160	3	GACKLE DRILLING CO.	PRO	18S	34E	01 3 3	N32° 46' 10.18"	W103° 31' 19.51"	26-May-59	4,003	100
L 04160 APPRO				18S	34E	01 3 3	N32° 46' 10.18"	W103° 31' 19.51"	26-May-59	4,003	100
L 04250	3	CACTUS DRILLING CORP. OF TEXAS	PRO	18S	35E	5	N32° 46' 10.38"	W103° 29' 16.56"	27-Aug-59	3,966	60
L 04250 APPRO				18S	35E	5	N32° 46' 10.38"	W103° 29' 16.56"	27-Aug-59	3,966	60
L 04664	3	HONDO DRILLING COMPANY	PRO	18S	35E	05 3 2	N32° 46' 23.45"	W103° 29' 1.06"	16-Jun-61	3,967	70
L 04664 APPRO				18S	35E	05 3 2	N32° 46' 23.45"	W103° 29' 1.06"	16-Jun-61	3,967	70
L 04796	3	INC. A.W. THOMPSON	PRO	18S	35E	06 3 4 4	N32° 46' 10.52"	W103° 30' 3.22"	25-Jan-62	3,984	95
L 04796 APPRO				18S	35E	06 3 4 4	N32° 46' 10.52"	W103° 30' 3.22"	25-Jan-62	3,984	95
L 05414	0	CAMAY DRILLING COMPANY	PRO	18S	35E	06 4 3	N32° 46' 10.47"	W103° 29' 47.66"	28-May-64	3,980	60

* = Data obtained from the New Mexico Office of the State Engineer Website (http://waters.osc.state.nm.us:7001/WATERS/wr_RegisServlet1) and USGS Database

Shaded well information indicates well location shown on Figure 2

^A = in acre feet per annum

^B = Interpolated from USGS Topographical Map

IND = Industrial

STK = Livestock Watering

EXP = Exploration

PUB = Construction of Public Works

SRO = Secondary recovery of oil

SAN = Sanitary in conjunction with commercial use

POL = Pollution control well

OIL = Oil production

COM = Commercial

PRO = Prospecting or development of a natural resource

DOM = Domestic one household

(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

TABLE 2
Summary of Excavation Soil Sample Field Analyses and Laboratory Analytical Results
Chevron U.S.A. Inc.
Central Vacuum Unit #49 (NMOCD Ref.; EPI Ref.# 200061)

Sample I D	Depth (feet)	Soil Status	Sample Date	PID Field Analysis (ppm)	Field Chloride Analyses (mg/Kg)	Benzene (mg/Kg)	Toluene (mg/Kg)	Ethylbenzene (mg/Kg)	Total Xylenes (mg/Kg)	Total BTEX (mg/Kg)	GRO (C6-C10) (mg/Kg)	DRO (>C10-C28) (mg/Kg)	Total Hydrocarbons nC6-nC28 (mg/Kg)	Chloride (mg/Kg)
EBIN	2	Excavated	26-Jan-06	--	160	--	--	--	--	--	--	--	--	--
EBIS	2	In situ	26-Jan-06	--	240	--	--	--	--	--	--	--	--	--
EBON	2	In situ	26-Jan-07	--	240	--	--	--	--	--	--	--	--	--
EBOS	2	In situ	26-Jan-07	--	240	--	--	--	--	--	--	--	--	--
EBHO	Ground	In situ	26-Jan-06	--	4,000	--	--	--	--	--	--	--	--	--
EBH1	1	In situ	26-Jan-06	--	120	--	--	--	--	--	--	--	--	--
EBH2	1	In situ	26-Jan-06	--	800	--	--	--	--	--	--	--	--	--
EBH3	1	In situ	26-Jan-06	--	1,440	--	--	--	--	--	--	--	--	--
SBI1	2	Excavated	26-Jan-06	--	160	--	--	--	--	--	--	--	--	--
SBI2	2	Excavated	26-Jan-06	--	240	--	--	--	--	--	--	--	--	--
SBI3	2	Excavated	26-Jan-06	--	240	--	--	--	--	--	--	--	--	--
SBO1	2	In situ	26-Jan-06	--	960	--	--	--	--	--	--	--	--	--
SBO2	2	In situ	26-Jan-06	--	480	--	--	--	--	--	--	--	--	--

TABLE 2
Summary of Excavation Soil Sample Field Analyses and Laboratory Analytical Results
Chevron U.S.A. Inc.
Central Vacuum Unit #49 (NMOCD Ref.; EPI Ref.# 200061)

Sample I D	Depth (feet)	Soil Status	Sample Date	PID Field Analysis (ppm)	Field Chloride Analyses (mg/Kg)	Benzene (mg/Kg)	Toluene (mg/Kg)	Ethylbenzene (mg/Kg)	Total Xylenes (mg/Kg)	Total BTEX (mg/Kg)	GRO (C6-C10) (mg/Kg)	DRO (>C10-C28) (mg/Kg)	Total Hydrocarbons nC6-nC28 (mg/Kg)	Chloride (mg/Kg)
SBO3	2	In situ	26-Jan-06	--	400	--	--	--	--	--	--	--	--	--
NB1	2	In situ	26-Jan-06	--	240	--	--	--	--	--	--	--	--	--
NB2	2	In situ	26-Jan-06	--	480	--	--	--	--	--	--	--	--	--
NB3	2	In situ	26-Jan-06	--	240	--	--	--	--	--	--	--	--	--
SW1SSW-1'	1	In situ	19-Oct-06	--	240	--	--	--	--	--	--	--	--	224
SW2SS-1'	1	In situ	19-Oct-06	--	160	--	--	--	--	--	--	--	--	224
SW3SSE-1'	1	In situ	19-Oct-06	--	160	--	--	--	--	--	--	--	--	48
SW4EE-1'	1	In situ	19-Oct-06	--	160	<0 005	<0 005	<0 005	<0 015	<0 030	<10 0	<10 0	<20 0	144
SW5NNE-1'	1	In situ	19-Oct-06	--	320	--	--	--	--	--	--	--	--	480
SW6NN-1'	1	In situ	19-Oct-06	--	1,200	--	--	--	--	--	--	--	--	1,360
SW7NNW-1'	1	In situ	19-Oct-06	--	320	--	--	--	--	--	--	--	--	512
SW8WW-1'	1	In situ	19-Oct-06	--	240	--	--	--	--	--	--	--	--	352
BH11W-2'	2	In situ	19-Oct-06	--	240	<0 005	<0 005	<0 005	<0 015	<0 030	<10 0	<10 0	<20 0	288
BH12E-2'	2	In situ	19-Oct-06	--	320	--	--	--	--	--	--	--	--	464

TABLE 2
Summary of Excavation Soil Sample Field Analyses and Laboratory Analytical Results
Chevron U.S.A. Inc.
Central Vacuum Unit #49 (NMOCD Ref.; EPI Ref.# 200061)

Sample I D	Depth (feet)	Soil Status	Sample Date	PID Field Analysis (ppm)	Field Chloride Analyses (mg/Kg)	Benzene (mg/Kg)	Toluene (mg/Kg)	Ethylbenzene (mg/Kg)	Total Xylenes (mg/Kg)	Total BTEX (mg/Kg)	GRO (C6-C10) (mg/Kg)	DRO (>C10-C28) (mg/Kg)	Total Hydrocarbons nC6-nC28 (mg/Kg)	Chloride (mg/Kg)
WSW-1 (6")	0.5	In situ	12-Jan-07	--		--	--	--	--	--	--	--	--	1,090
WSW-2 (6")	0.5	In situ	12-Jan-07	--		--	--	--	--	--	--	--	--	3,390
SSW-3 (6")	0.5	In situ	12-Jan-07	--		--	--	--	--	--	--	--	--	2,940
SSW-4 (6")	0.5	In situ	12-Jan-07	--		--	--	--	--	--	--	--	--	4,800
SSW-5 (6")	0.5	In situ	12-Jan-07	--		--	--	--	--	--	--	--	--	656
NMOCD Remedial Thresholds				100		10				50			100	250

Bolded values are in excess of NMOCD Remediation Threshold Goals

-- = Not Analyzed

BH = Soil samples collected from the bottom of the excavation, SW = Soil samples collected from the side walls of the excavation (E=East, W=West, N=North and S=South)

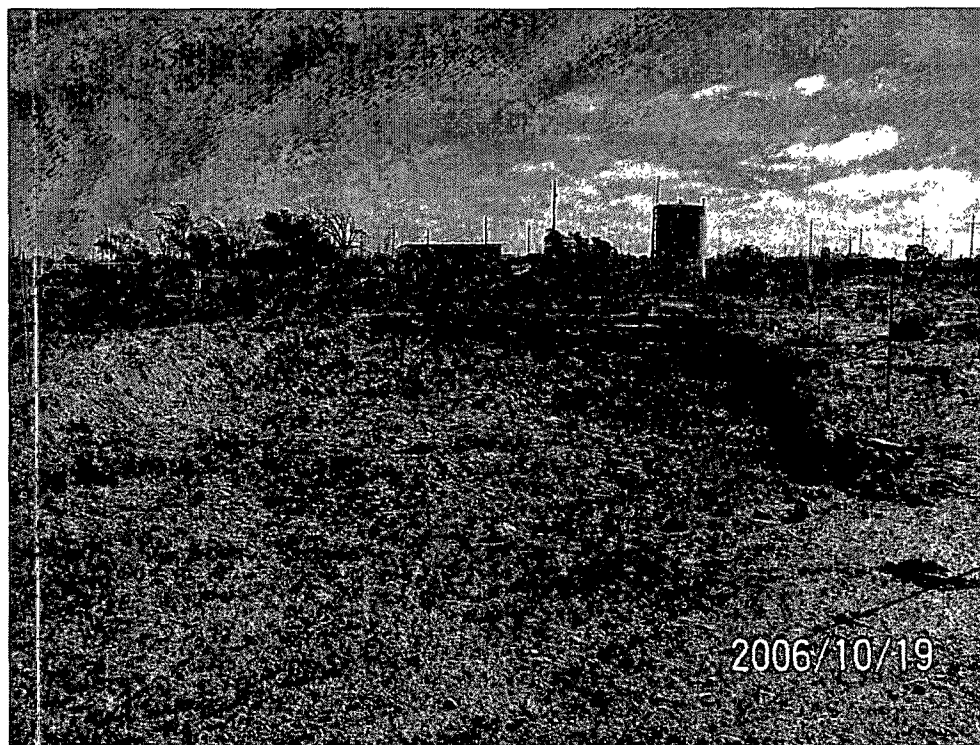
←
Pg 2
Shows 6',
Not 6"

ATTACHMENTS

ATTACHMENT I
SITE PHOTOGRAPHS



Photograph No. 1 – Lease Sign



Photograph No. 2 – Looking easterly at excavation and abandoned steel line



Photograph No. 3 – Looking southerly at excavation and anchor



Photograph No. 4 – Looking east at excavation and abandoned steel line

ATTACHMENT II

LABORATORY ANALYTICAL RESULTS AND
CHAIN-OF CUSTODY FORM



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

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

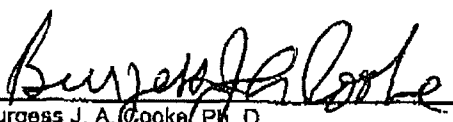
ANALYTICAL RESULTS FOR
ENVIRONMENTAL PLUS, INC.
ATTN: PAT McCASLAND
P.O. BOX 1558
EUNICE, NM 88231
FAX TO: (505) 394-2601

Receiving Date: 10/23/06
Reporting Date: 10/24/06
Project Owner: CHEVRON USA (#200061)
Project Name: CVU #49 PIT
Project Location: NOT GIVEN

Sampling Date: 10/19/06
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

LAB NO.	SAMPLE ID	GRO (C ₈ -C ₁₀) (mg/Kg)	DRO (>C ₁₀ -C ₂₈) (mg/Kg)	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE:		10/23/06	10/23/06	10/23/06	10/23/06	10/23/06	10/23/06
H11691-4	SW4EE-1'	<10.0	<10.0	<0.005	<0.005	<0.005	<0.015
H11691-9	BH1W-2'	<10.0	<10.0	<0.005	<0.005	<0.005	<0.015
Quality Control		744	751	0.111	0.100	0.104	0.300
True Value QC		800	800	0.100	0.100	0.100	0.300
% Recovery		92.9	93.9	111.0	100	104	100
Relative Percent Difference		4.9	5.3	5.8	5.4	5.3	6.4

METHODS: TPH GRO & DRO - EPA SW-846 8015 M; BTEX - SW-846 8260.


Burgess J. A. Cooke, Ph. D.

10/24/06
Date

H11691A

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 services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



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

Receiving Date: 10/23/06
Reporting Date: 10/23/06
Project Owner: CHEVRON USA (#200061)
Project Name: CVU #49 PIT
Project Location: NOT GIVEN

Analysis Date: 10/23/06
Sampling Date: 10/19/06
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: HM

LAB NO.	SAMPLE ID	Cr (mg/Kg)
H11691-1	SW1SSW-1'	224
H11691-2	SW2SS-1'	224
H11691-3	SW3SSE-1'	48
H11691-4	SW4EE-1'	144
H11691-5	SW5NNE-1'	480
H11691-6	SW6NN-1'	1360
H11691-7	SW7NNW-1'	512
H11691-8	SW8WW-1"	352
H11691-9	BH1W-2'	288
H11691-10	BH2E-2'	464
Quality Control		500
True Value QC		500
% Recovery		100
Relative Percent Difference		0.0

METHOD: Standard Methods

4500-CIB

NOTE: Analyses performed on 1:4 w:v aqueous extracts.

Roger L. Moreno
Chemist

10-24-00
Date

H11691

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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

H11691

1 of 1

Company Name		Environmental Plus, Inc.		<div style="text-align: center;"> Chevron USA HCR 60 Box Lovington, NM 88260 Attention: Mr. Dee Tate </div>																											
EPI Project Manager		Pat McCasland																													
Billing Address		P.O. BOX 1558																													
City, State, Zip		Eunice New Mexico 88231																													
EPI Phone#/Fax#		505-394-3481 / 505-394-2601																													
Client Company		Chevron USA																													
Facility Name		CVU #49 Pit																													
Project Reference		#200061																													
EPI Sampler Name		George Blackburn																													
LAB I.D.	SAMPLE I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						PRESERV.		SAMPLING		BTX 8021B	TPH 8015M	CHLORIDES (Cl)	SULFATES (SO ₄)	pH	TCLP	OTHER >>>											
				GROUND WATER	WASTEWATER	SOIL	CRUDE OIL	SLUDGE	OTHER:	ACID/BASE	ICE/COOL	OTHER	DATE														TIME				
N11691-1	1 SW1SSW-1'	X	1			X					X		10/19/06	7:30			X														
2	2 SW2SS-1'	X	1			X					X		10/19/06	7:40			X														
3	3 SW3SSE-1'	X	1			X					X		10/19/06	7:50			X														
4	4 SW4EE-1'	X	1			X					X		10/19/06	8:00	X	X	X														
5	5 SW5NNE-1'	X	1			X					X		10/19/06	8:10			X														
6	6 SW6NN-1'	X	1			X					X		10/19/06	8:20			X														
7	7 SW7NNW-1'	X	1			X					X		10/19/06	8:30			X														
8	8 SW8WW-1"	X	1			X					X		10/19/06	8:40			X														
9	9 BH1W-2'	X	1			X					X		10/19/06	10:15	X	X	X														
10	10 BH2E-2'	X	1			X					X		10/19/06	11:15			X														

Sampler Relinquished:		Date: 10-19-06	Received By:	Fax Results To Pat McCasland - EPI @ 505-394-2601	
<i>George Blackburn</i>		Time: 6:36	<i>George Miller</i>	REMARKS. Chain of custody requested. Send original reports to Pat McCasland - EPI.	
Relinquished By:		Date: 10-23-06	Received By: (lab staff)	2 BTX - 120	
<i>George L Miller</i>		Time: 8:23	<i>Benjamin L. Baker</i>	2 TPH - 180	
Delivered by:		Sample Cool & Intact		10 Cl - 250	
		Yes No		Total - 550 Tax	



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

ANALYTICAL RESULTS FOR ENVIRONMENTAL PLUS, INC.

ATTN: DAVID P. DUNCAN

P.O. BOX 1558

EUNICE, NM 88231

FAX TO: (505) 394-2601

Receiving Date: 01/15/07

Reporting Date: 01/15/07

Project Owner: CHEVRON USA (#200061)

Project Name: CVU #49 PIT

Project Location: NOT GIVEN

Analysis Date: 01/15/07

Sampling Date: 01/12/07

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: BC

Analyzed By: AB

[illegible]

METHOD: Standard Methods

4500-C/B

NOTE: Analyses performed on 1:4 w:v aqueous extracts.

Lope S. Moreno
Chemist

01-16-07
Date

H12032

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 a fully performed service. 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 services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.

Cardinal Laboratories Inc.

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915-673-7001 Fax 915-673-7020

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District I
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Phone:(575) 393-6161 Fax:(575) 393-0720

District II
811 S. First St., Artesia, NM 88210
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District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170

District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 206300

CONDITIONS

Operator: CONOCOPHILLIPS COMPANY 600 W. Illinois Avenue Midland, TX 79701	OGRID: 217817
	Action Number: 206300
	Action Type: [IM-SD] Admin Order Support Doc (ENV) (IM-BAO)

CONDITIONS

Created By	Condition	Condition Date
jharimon	None	4/11/2023