



# AE Order Number Banner

## Report Description

This report shows an AE Order Number in Barcode format for purposes of scanning. The Barcode format is Code 39.



**App Number:** pLWJ1013038068

**1RP - 2512**

**CHEVRON U S A INC**



**CONESTOGA-ROVERS  
& ASSOCIATES**

2135 S. Loop 250 West  
Midland, Texas 79705  
Telephone: (432) 686-0086 Fax: (432) 686-0186  
<http://www.craworld.com>

REVIEWED 03128111  
- APPROVED W/ COND TO  
40 DEEPER THAN 40'  
W/ BORING IF SAMPLES  
STILL > RRALS

January 18, 2011

**RECEIVED**

Reference No. 073041

JAN 21 2011

**HOBBSOCD**

Mr. Geoffery Leking  
New Mexico Oil Conservation Division  
District I Office - 1625 N. French Drive  
Hobbs, NM 88240

Re: **Proposed Delineation and Closure Activities for Remediation Plan 10-5-2512**  
Chevron West Dollarhide Drinkard Unit Well #64 Injection Line Release  
(Unit Letter I) of Section 31, Township 24 South, Range 38 East  
Lea County, New Mexico

Dear Mr. Leking:

On behalf of Chevron Environmental Management Company (Chevron), Conestoga-Rovers and Associates (CRA) herewith submits this correspondence for Remediation Plan #10-5-2512 to the New Mexico Oil Conservation Division (OCD) regarding proposed assessment and remedial activities associated with the subject injection line release location (Site). The Site is also proximate to the WDDU #148 well location (FIGURE 1). The Dollarhide Chevron office immediately notified Mr. Larry Johnson with the Hobbs OCD office by telephone on May 1, 2010 and submitted the required C-141 Release Notification and Corrective Action Form dated May 3, 2010 (attached).

**PROJECT INFORMATION**

The subject release location is situated approximately seven miles northeast of Jal, in Lea County, New Mexico. According to information from the C-141 Release Notification and Corrective Action form filed with the New Mexico Oil Conservation Division (OCD), a two-inch WDDU #64 water injection line released approximately 87.1734 barrels of produced water and 0.8683 barrels of oil south of the WDDU #148 location on May 1, 2010. A reported 50.5 barrels of fluids were recovered by a vacuum truck during response activities. The Chevron Midland office and Dollarhide FMT office (Ricky Heredia) have been in contact with the OCD regarding the ongoing status of the assessment and remediation work associated with this produced water release site.

The Site is not located within 1000 feet of any surface water bodies or wellhead protection areas. Review of surface elevation and depth to water data from the online Petroleum Resource Center's New Mexico Pit Rule Mapping Portal indicates the depth to groundwater beneath the Site to be slightly greater than 100 feet below the ground surface. Consequently, OCD Recommended Remediation Action Levels (RRALs) applied to this site are 10 ppm benzene, 50 ppm BTEX, 5,000 ppm TPH and 1,000 ppm chlorides.

On May 13, and on behalf of Chevron, Ron's Welding Inc. (RWI) and an environmental consultant, Ms. Cindy Crain, mobilized to the site to perform soil assessment tasks. Heavy equipment was utilized to obtain soil samples from various depths down to 17 feet below ground surface (bgs) at six test pit

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locations (see attached analytical table). Analytical results demonstrate three locations, SS-3, SS-5 and SS-6 with elevated chloride (>1000 mg/kg) concentrations. The three other locations demonstrated hydrocarbon and chloride concentration levels below RRALs established for this location. The Site sketch provides locations of the test pits and the configuration of the resulting remedial excavation. Three active pipelines, including the high-pressure injection line - are exposed in the excavation. A large remedial excavation with an approximate dimension of 325' x 75' x 5' deep exists at the site. A smaller (90' x 40' x 5') remedial excavation is situated south of the WDDU #148 well pad. The volume of soils removed offsite to the Sundance facility in Eunice, NM, from the excavation has been reported to CRA to be approximately 2,100 cubic yards.

On January 11, 2011, Tom Larson and James Ornelas with CRA, Matt Hudson with Chevron and Marcos Silvestri with AECOM met you at the OCD District 1 office to discuss the subject project. Discussions from the meeting included previous OCD communications, assessment/delineation data (see attached) and remedial activities performed at the Site to date. Additional vertical/horizontal delineation and Site restoration activities were also discussed and are outlined below in the proposed Site closure activities.

## **PROPOSED SITE CLOSURE ACTIVITIES**

### **Additional Horizontal and Vertical Delineation**

Results of the soil sampling (test pit) analysis and notification of the removal of impacted soils (to 5' bgs) at the WDDU #64 injection line release site were communicated by Chevron to Larry Johnson with the OCD District 1 office in Hobbs, NM in the summer of 2010. After review of the information and in a verbal communication, Mr. Johnson requested that three soil borings be advanced adjacent to the SS-3, SS-5 and SS-6 test pit locations (see attached table of analytical results and map). Note the subject test pit locations (3) have elevated chloride concentrations in the soils at depth. The objective of the boring program is to evaluate the vertical extent of chloride impacts at the respective locations. As requested, Chevron proposes the installation of three soil borings adjacent to test pits to a proposed depth of 40' bgs. Prior to boring installation, the ramp construction to access the boring locations will be required. Soil boring samples will be collected in 5 foot intervals from the excavation floor to the proposed total depth of 40 feet. CRA will log the lithology and characteristics of soils within the borings. The depth, location and sampling intervals will be based on the professional judgment of the CRA geologist/site supervisor and field conditions encountered. Soil samples will be analyzed by ALS Laboratories of Houston, Texas for chlorides using EPA Method 300; benzene, toluene, ethylbenzene, and xylenes (BTEX) by EPA Method 8021B and Total Petroleum Hydrocarbons (TPH) using EPA Method 8015 (modified) for DRO/GRO). The soil borings will be plugged with bentonite and boring records will be provided to the State of New Mexico. Proposed soil boring and sidewall sample locations are provided in FIGURE 2.

In addition, four sidewall samples will be collected in the larger remedial excavation northeast of the WDDU #148 wellhead and four sidewall samples will be collected from the smaller remedial excavation south of the WDDU #148 wellhead. The sidewall samples will be utilized to evaluate the horizontal extent of soil impacts and will be analyzed for the same analytical suite proposed for the soil borings.



**CONESTOGA-ROVERS  
& ASSOCIATES**

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Results of the additional horizontal and vertical delineation activities will be compiled and submitted to the OCD District 1 office for review. Recommendations for any additional assessment and remediation activities, as appropriate, will be discussed with the OCD at this time.

**Site Restoration Activities**

The proposed Site restoration activities will not be initiated without OCD concurrence and notifications. Subsequent to OCD review of the additional horizontal and vertical delineation data, additional soil removal may or may not be proposed by Chevron. At this time and for remediation plan discussion purposes, Chevron proposes the following at this active pipeline location:

- Installation of a 20-mil poly liner on the floor (approximately 5 feet) of the two remedial excavations
- Importation of clean, soil and caliche materials (approximately 2,500 cubic yards) above the liners to match the surface topography
- Ripping and seeding of the construction-affected area utilizing a seed mixture as designated by the property owner

The implemented remediation plan and Site closure activities will be compiled and included in the FINAL C-141 report associated with this release incident. Chevron is prepared to begin the proposed work immediately to OCD concurrence. Please contact Tom Larson with CRA at 423-686-0086 if you would like to discuss this matter in more detail. Thanks in advance for your considerations and we look forward to working with the OCD on this remediation plan. Your timely response to this correspondence is appreciated.

Yours truly,  
CONESTOGA-ROVERS & ASSOCIATES

A handwritten signature in blue ink that reads 'Thomas C. Larson'.

Thomas C. Larson  
Operations Manager

**Enclosures:**

- FIGURE 1 - Site Location Map
- FIGURE 2 - Proposed Soil Boring Location Map
- OCD Initial Report Form C-141
- Soil Analytical Table From Delineation Activities

cc.: Mr. Matt Hudson, Chevron Environmental Management Company (Houston)  
Mr. Marcos Silvestri, AECOM (Houston)

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

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

Form C-141  
Revised October 10, 2003

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

Release Notification and Corrective Action

OPERATOR  Initial Report  Final Report

Name of Company Chevron	Contact Ricky Heredia
Address PO Drawer 29 Andrews, Texas 79714	Telephone No. 432-523-365 ext 7603
Facility Name West Dollarhide Drinkard Unit <i>M/S</i>	Facility Type
Surface Owner George Willis	Mineral Owner Chevron
Lease No.	

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
1	31	24 S	38 E					

Latitude \_\_\_\_\_ Longitude \_\_\_\_\_

NATURE OF RELEASE

Type of Release Produce Water	Volume of Release 88.043 bbls	Volume Recovered 50.5 bbls
Source of Release 2" West Latral line	Date and Hour of Occurrence 5/1/2010 11:30	Date and Hour of Discovery 5/1/2010 11:30
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom : 5-1-10 approx 8:00pm EL Gonzales	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*  
*I called Larry Johnson 5-6- @ 11:30 TX. He said get started + keep him informed.*

Describe Cause of Problem and Remedial Action Taken.\*  
High Pressure 2" line failed causing spill 0.8683 bbls oil and 87.174 bbls Produce Water  
Field Specialist shut in pump and isolated leak called out vacuum truck

Describe Area Affected and Cleanup Action Taken.\*  
Free liquids were removed from the spill area. The impacted area will be evaluated for depth and quantity of chlorides. If additional remediation is needed a work plan will submitted to the NM ODD describing the proposed actions to be taken.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

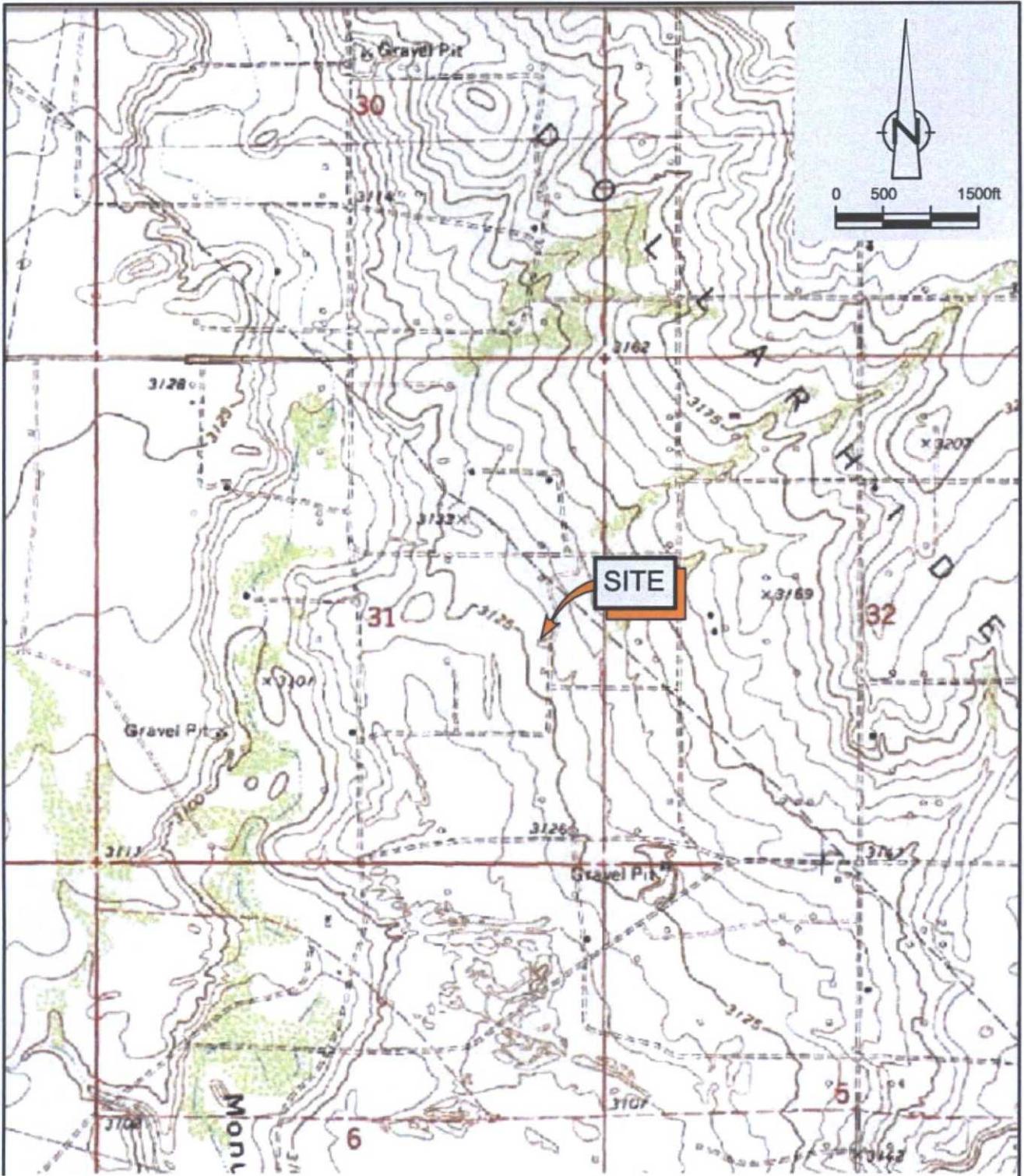
Signature: <i>Ricky Heredia</i>	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: <i>Ricky Heredia</i>	Approved by District Supervisor:	
Title: Dollarhide Field HES	Approval Date:	Expiration Date:
E-mail Address: <i>rhrcc@chevron.com</i>	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 5/3/2010 Phone: 432-238-2343		

\* Attach Additional Sheets If Necessary

Table 1:  
 Summary of Laboratory Analysis of Soil Samples from Delineation Activities  
 Chevron, West Dollardside Drinkard Unit (WDDU) # 148  
 Unit Letter I, Section 31, Township 24 South, Range 38 East  
 Lea County, New Mexico

Sample Date	Soil Sample Number	Sample Depth (feet BGS)	TPH - GRO (C6 - C10) (mg/kg)	TPH - DRO (>C10 - C28) (mg/kg)	Total TPH (mg/kg)	Benzene (mg/kg)	Total BTEX (mg/kg)	Chloride (mg/kg)
WQCC Standard					5,000	10	50	1,000
5/13/10	SS-1	0-6"	<10.0	158	158	<0.050	<0.45	20,600
5/13/10		3	<10.0	<10.0	<20.0	---	---	4,640
5/13/10		5	---	---	---	---	---	3,200
5/13/10		7.5	---	---	---	---	---	1,090
5/13/10		10	---	---	---	---	---	880
5/13/10		15	---	---	---	---	---	256
5/13/10	SS-2	0-6"	<10.0	<10.0	<20.0	<0.050	<0.45	<16
5/13/10		2.5	<10.0	<10.0	<20.0	---	---	1,090
5/13/10		5	---	---	---	---	---	---
5/13/10		7.5	---	---	---	---	---	---
5/13/10		10	---	---	---	---	---	608
5/13/10		15	---	---	---	---	---	304
5/13/10	SS-3	0-6"	395	11,400	11,795	<0.050	4.98	20,000
5/13/10		2.5	2,330	5,630	7,960	0.378	40.358	3,840
5/13/10		5	55.6	290	345.6	<0.050	3.325	3,480
5/13/10		7.5	<10.0	43.3	43.3	---	---	4,160
5/13/10		10	---	---	---	---	---	3,680
7/14/10		15	---	---	---	---	---	4,320
5/13/10	SS-4	0-6"	1,160	16,000	17,160	0.127	15.937	4,800
5/13/10		2.5	<10.0	<10.0	<20.0	---	---	3,360
5/13/10		5	---	---	---	---	---	1,300
5/13/10		7.5	---	---	---	---	---	4,320
5/13/10		10	---	---	---	---	---	6,300
5/13/10		15	---	---	---	---	---	4,240
7/14/10		20	---	---	---	---	---	464
5/13/10	SS-5	0-6"	1,380	24,200	25,580	0.120	13.11	10,800
5/13/10		2.5	19.6	189	208.6	---	---	3,720
5/13/10		5	---	---	---	---	---	4,160
5/14/10		7.5	---	---	---	---	---	1,490
5/14/10		10	---	---	---	---	---	1,100
5/14/10		15	---	---	---	---	---	2,040
8/9/10		17	---	---	---	---	---	1,420
5/14/10	SS-6	0-6"	<10.0	19.9	19.9	<0.050	0.61	4,720
5/14/10		2.5	<10.0	<10.0	<20.0	---	---	1,800
5/14/10		5	---	---	---	---	---	2,440
5/14/10		7.5	---	---	---	---	---	2,920
5/14/10		10	---	---	---	---	---	1,520

- Notes: *Samples Analyzed by Cardinal Laboratories, Hobbs, New Mexico*
1. BGS: Depth in feet below ground surface
  2. mg/kg: Milligrams per kilogram
  3. ---: No Data Available
  4. <: Less than method detection limit



SOURCE: USGS TOPOGRAPHIC MAP  
 JAL NE 7.5 MINUTE QUADRANGLE  
 32.17294° N, 103.09325° W

figure 1

**SITE LOCATION MAP**  
**REMEDATION PLAN 10-5-2512**  
**SECTION 31(I); T-24-S; R-38-E**  
**LEA COUNTY, NEW MEXICO**

*Chevron Environment Management Company*



