

GW - 029

**GENERAL
CORRESPONDENCE**

2010

Chavez, Carl J, EMNRD

From: Hudson, Matt [MHudson@chevron.com]
Sent: Wednesday, March 24, 2010 12:54 PM
To: Chavez, Carl J, EMNRD
Cc: VonGonten, Glenn, EMNRD; Griswold, Jim, EMNRD; Hill, Larry, EMNRD; Johnson, Larry, EMNRD; Leking, Geoffrey R, EMNRD
Subject: RE: Former Buckeye Compressor Station, Lea County, NM (GW-029)

Carl,

Chevron plans to begin the soil investigation on April 26th. We anticipate it will take 10 days to complete. Please give me a call with any questions.

Thanks
Matt

From: Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]
Sent: Monday, March 01, 2010 4:10 PM
To: Hudson, Matt
Cc: VonGonten, Glenn, EMNRD; Griswold, Jim, EMNRD; Hill, Larry, EMNRD; Johnson, Larry, EMNRD; Leking, Geoffrey R, EMNRD
Subject: FW: Former Buckeye Compressor Station, Lea County, NM (GW-029)

Matt:

The OCD has reviewed the soil investigation/interim phase-separated hydrocarbon remedy dated December 8, 2009.

The OCD hereby approves the remedy that will provide more information as to an ongoing source and type of source of free product if found during the investigation.

Please provide the OCD with a work schedule for implementation so we may witness the field work. Drilling wastes will be containerized and properly disposed.

Please contact me if you have questions. Thank you.

*Please be advised that NMOCD approval of this plan does not relieve **Chevron** of responsibility should their operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve **Chevron** of responsibility for compliance with any other federal, state, or local laws and/or regulations.*

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3490
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>
(Pollution Prevention Guidance is under "Publications")

From: Chavez, Carl J, EMNRD
Sent: Friday, February 26, 2010 2:29 PM
To: 'mhudson@chevron.com'

Cc: VonGonten, Glenn, EMNRD; Griswold, Jim, EMNRD
Subject: Former Buckeye Compressor Station, Lea County, NM (GW-029)

Matt:

Good afternoon. Could you give me a call or provide a date and time for a telephone conference call your letter dated December 8, 2009 and the PSH problem at MW-19.

The OCD is interested in discussing the soil investigation/interim phase-separated hydrocarbon remedy at MW-19. Thank you.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3490
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
Website: <http://www.emnrd.state.nm.us/oed/index.htm>
(Pollution Prevention Guidance is under "Publications")

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message.
This email has been scanned using Webroot Email Security.

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Monday, March 01, 2010 3:10 PM
To: 'mhudson@chevron.com'
Cc: VonGonten, Glenn, EMNRD; Griswold, Jim, EMNRD; Hill, Larry, EMNRD; Johnson, Larry, EMNRD; Leking, Geoffrey R, EMNRD
Subject: FW: Former Buckeye Compressor Station, Lea County, NM (GW-029)

Matt:

The OCD has reviewed the soil investigation/interim phase-separated hydrocarbon remedy dated December 8, 2009.

The OCD hereby approves the remedy that will provide more information as to an ongoing source and type of source of free product if found during the investigation.

Please provide the OCD with a work schedule for implementation so we may witness the field work. Drilling wastes will be containerized and properly disposed.

Please contact me if you have questions. Thank you.

*Please be advised that NMOCD approval of this plan does not relieve **Chevron** of responsibility should their operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve **Chevron** of responsibility for compliance with any other federal, state, or local laws and/or regulations.*

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3490
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
Website: <http://www.emnrd.state.nm.us/oed/index.htm>
(Pollution Prevention Guidance is under "Publications")

From: Chavez, Carl J, EMNRD
Sent: Friday, February 26, 2010 2:29 PM
To: 'mhudson@chevron.com'
Cc: VonGonten, Glenn, EMNRD; Griswold, Jim, EMNRD
Subject: Former Buckeye Compressor Station, Lea County, NM (GW-029)

Matt:

Good afternoon. Could you give me a call or provide a date and time for a telephone conference call your letter dated December 8, 2009 and the PSH problem at MW-19.

The OCD is interested in discussing the soil investigation/interim phase-separated hydrocarbon remedy at MW-19. Thank you.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3490

Fax: (505) 476-3462

E-mail: CarlJ.Chavez@state.nm.us

Website: <http://www.emnrd.state.nm.us/ocd/index.htm>
(Pollution Prevention Guidance is under "Publications")

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Friday, February 26, 2010 2:29 PM
To: 'mhudson@chevron.com'
Cc: VonGonten, Glenn, EMNRD; Griswold, Jim, EMNRD
Subject: Former Buckeye Compressor Station, Lea County, NM (GW-029)

Matt:

Good afternoon. Could you give me a call or provide a date and time for a telephone conference call your letter dated December 8, 2009 and the PSH problem at MW-19.

The OCD is interested in discussing the soil investigation/interim phase-separated hydrocarbon remedy at MW-19. Thank you.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3490
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
Website: <http://www.emnrd.state.nm.us/oed/index.htm>
(Pollution Prevention Guidance is under "Publications")



RECEIVED
Matthew J. Hudson
Remediation Project
Manager
2009 DEC 10 PM 2 52

Upstream Business Unit
Chevron Environmental
Management Company
15 Smith Rd
Midland, TX 79705
Tel 432 687 7561
mHUDSON@chevron.com

December 8, 2009

Mr. Glenn Von Gonten
New Mexico Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

**Subject: Soil Investigation/Interim Phase-Separated Hydrocarbon Remedy
Former Buckeye Compressor Station, Lea County, New Mexico
Discharge Permit GW-029**

Dear Mr. Von Gonten:

This scope of work outlines the proposed soil investigation and interim hydrocarbon remedy at the former Buckeye Compressor Station in Lea County, New Mexico. The Site legal description is (SW/4, SE/4), Section 36, Township 17 South, Range 34 East, Lea County, New Mexico.

A substantial increase in the phase-separated hydrocarbon (PSH) thickness was observed during the most recent groundwater monitoring event conducted in September 2009. A PSH thickness of 4 feet in monitor well MW-19 was reported to the New Mexico Oil Conservation Division (NMOCD) during the October 21st meeting in Santa Fe. This level reflects a PSH increase of 3.83 feet since October 2008. In response to these data, NMOCD requested an interim action scope of work to assess the soils and begin interim hydrocarbon recovery.

Chevron proposes to advance six soil borings and install one recovery well as part of an initial program to assess and address the PSH. Figure 1 identifies the location of historical soil borings, proposed soil borings, and the proposed recovery well. Four borings and the recovery well will be installed around MW-19 and two borings will be advanced around monitor well MW-4, which exhibits benzene concentrations in excess of 10 milligrams per liter.

A bail down test will be conducted on MW-19 to obtain PSH recovery data prior to investigation activities.

Soil Boring and Sample Collection

The six borings will be advanced using continuous-core sonic drilling techniques to the water table (approximately 130 feet below ground surface). The borings will be sampled continuously, and the samples examined by a qualified individual. The soil and bedrock lithology (using the Unified Soil Classification System and standard lithologic descriptions) and relevant observations will be recorded on the field log. The samples will be field screened for organic vapors using a photo-ionization detector (PID) at 5-foot intervals from 0-30 below ground surface (bgs) and 10-foot intervals from 30-feet to 80 feet or deeper, if possible.

A maximum of four soil samples will be collected from each boring. One sample, from the interval exhibiting the highest PID concentration, will be collected from the each of the following depth intervals:

- 0-10 feet
- 10-65 feet
- 65-130 feet (approximate groundwater depth)

An unsaturated sample will also be collected from directly above the groundwater interface.

The samples will be sent to the laboratory for the following analyses:

- Benzene, toluene, ethylbenzene, and xylenes (BTEX), using USEPA Method 602/8020 ; and
- Total Petroleum Hydrocarbons (TPH) for gasoline range organics (GRO) and diesel range organics (DRO), using USEPA Method 8015 Modified.

Recovery Well Installation and PSH Removal

One of the soil borings will be converted into a recovery well, consisting of 4-inch-diameter, flush-threaded PVC with 20 feet of 0.020-inch factory slotted screen. The well will be screened such that 5 feet of screen will be above the water table and 15 feet of screen will be below the water table.

Appropriately sized silica sand will be placed around the screen to approximately 2 feet above the top of the screen, followed by a minimum 2-foot bentonite seal. The recovery well will then be grouted to the surface, and completed above grade with a 4-foot concrete pad and protective casing. Well development will be conducted with a surge block (or equivalent). The location and top of casing elevations will be surveyed to the nearest 0.01-inch by a licensed professional surveyor.

Following installation of the recovery well, a bail down test will be conducted to obtain PSH recovery data.

Sample Quality Assurance/Quality Control

Chain-of-custody procedures will be followed to maintain and document sample possession. A project specific chain-of-custody record will be utilized by field personnel to document possession of all samples collected for chemical analysis. This record will include, but is not limited to, the following information:

- Project name and number
- Name(s) and signatures of samplers
- Sample identification number and location
- Date and time of collection
- Number and type of containers
- Required analyses
- Laboratory name and address
- Courier
- Signatures documenting change of sample custody

Chain-of-custody forms will accompany samples at all times. When transferring possession of the samples, the individuals relinquishing and receiving the samples will sign, date, and note the time of transfer on the record.

Mr. Glenn Von Gonten
New Mexico Oil Conservation Division
December 8, 2009
Page 3

Reporting

Following the investigation, Chevron will submit a report to NMOCD documenting the results. The report will include the following:

- Sample location map;
- Soil boring logs;
- Well construction diagrams;;
- Detailed geologic cross-sections;
- Tabular analytical data; and
- Recommendations for further assessment, if warranted.

Following evaluation of the investigation and bail down test data, Chevron will submit a hydrocarbon recovery plan for abating the PSH.

Should you have any questions, please contact me at (432) 687-7561.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew P. Hudson", written in a cursive style.

Matthew P. Hudson

Attachments:

Figure 1: Proposed PSH Recovery Well and Soil Boring Locations

cc: Matt Carlson, Stantec
Seth Maher, Stantec

