2R - <u>58</u>

REPORTS DATE:

0072006

ENVIRONMENTAL PLUS, INC.

CONSULTING AND REMEDIAL CONSTRUCTION

October 12, 2006

Mr. Gerry Guye, Deputy Field Inspector New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division Environmental Bureau 1301 West Grand Avenue Artesia, New Mexico 88210

Re: C-144 – Alternative Closure Proposal

Chevron USA (O-Grid #4323)

Pure Resources (O-Grid #150628) Catclaw Draw Unit #21 (Ref. #200078) UL-C, Section 14, Township 21 South, Range 25 East, Eddy County, New Mexico

Latitude: N 32°29'05.59" and Longitude: W 104°22'08.83"

Dear Mr. Guye:

Environmental Plus, Inc. (EPI), on behalf of Chevron USA (Chevron) (Pure Resources) submits the enclosed New Mexico Oil Conservation Division (NMOCD) form C-144 and supporting information proposing an alternative closure at this site. The alternative closure proposes encapsulating the intact pit in place even though the bottom of the pit will be less than 50-feet from the groundwater, (i.e., the bottom of the existing pit is approximately 48-feet from the groundwater interface).

BACKGROUND

Initially, Chevron proposed closing the drill pit via encapsulation in accordance with the NMOCD Pit and Below-Grade Tank Guidelines, November 1, 2004 and the "ChevronTexaco Drilling and Reserve Pit Closure General Plan, December 2004" and was based on the following discussion and rationale.

The Chevron groundwater contour map indicates the groundwater underlying the Catclaw Draw #21 drill pit to be less than 50-feet bgs, however, after review of available water level information from the USGS and the New Mexico Office of the State Engineer (reference *Table 1*), the depth to groundwater at the site is calculated to be approximately 56-feet bgs and was derived as follows. The nearest water well to the Catclaw Draw #21 well site is down-gradient approximately 1,400-feet to the north northeast and has a 1992 USGS water level measurement of 34-feet below ground surface (bgs). On July 28, 2006, the groundwater level in this well was measured to be 35.0-feet bgs. The surface elevation of the windmill, as extrapolated from the USGS topographical map, is approximately 3,278-feet amsl. The calculated groundwater table elevation is 3,244-feet amsl, (i.e., 3,278 – 34 = 3,244). The surface elevation at the Catclaw Draw #21 well site, as extrapolated from the USGS topographical map, is 3,300-feet amsl. Reasonably assuming that the groundwater

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table elevation under the well site is also 3,244-feet amsl, the calculated depth to groundwater is 56-feet amsl.

Mr. Van Barton, Compliance Officer, NMOCD Artesia Field Office, said that he would grant approval of the encapsulation proposal if the bottom of the pit was greater than 50-feet from groundwater. However, because the pit is approximately 8-feet deep and the groundwater is approximately 56-feet below the land surface where the drill pit was constructed, the bottom of the encapsulated pit is only 48-feet from the groundwater, negating local NMOCD approval. Mr. Barton said that encapsulation proposals of pits less than 50-feet from groundwater could be submitted to the Santa Fe office of the NMOCD for consideration and approved, if deemed technically acceptable. Mr. Wayne Price, NMOCD Santa Fe office, said that he could possibly approve the alternative closure proposal if the pit liner was intact and fluids had not been released from the pit, as evidenced by analysis of soil samples collected from perimeter locations adjacent to the pit at 4-feet to 8-feet bgs. Subsequently, on July 28, 2006, after timely notification of the Artesia and Santa Fe NMOCD offices, samples of the soil from the perimeter locations adjacent to the pit were collected and submitted to the laboratory for analysis. The laboratory reports are attached and the results summarized in *Table* 2.

PIT PERIMETER SAMPLES ANALYTICAL RESULTS

According to the analytical results, benzene, toluene, ethylbenzene and total xylenes (BTEX) and total petroleum hydrocarbon (TPH) are not an issue inside or outside the pit. Chloride results from analysis of the east perimeter, west perimeter and the north perimeter soil samples collected from 6-feet to 8-feet bgs were less than 250 mg/Kg. The chloride concentration in the south perimeter sample collected from 6-feet to 8-feet bgs beneath the caliche well pad was 864 mg/Kg and probably resulted from well pad activities rather than being from the pit. It can be concluded from the analytical results from the perimeter samples that the pit did not over-flow.

NORTH PIT SAMPLE ANALYTICAL RESULTS

A soil sample was collected from an unlined but fenced surface depression north of the lined drill pit to delineate/verify possible drilling fluid impact. Total petroleum hydrocarbon and benzene, toluene, ethylbenzene and total xylenes (BTEX) were not detected above the respective method detection limits. The chloride concentration was 1,280 mg/Kg. Given that the chloride concentration of the stiffened pit contents is 42,000 mg/Kg, it is not reasonable to conclude that the chloride residual in the north pit emanated from the drill pit, but will require remediation.

ALTERNATIVE CLOSURE PROPOSAL REQUEST

Given that the pit liner is intact and the laboratory results from analysis of the soil samples collected from locations adjacent to the perimeter of the pit support the conclusion that the pit did not over-flow into the surrounding environment, it is proposed that a geotextile cushion be installed in the west part of the lined pit to ensure the integrity of the under liner, that the stiffened pit contents be evenly distributed over the pit and that a 20-mil reinforced polyethylene liner, cushioned above and below with geotextile, be installed over the stiffened pit contents. The pit will then be brought to grade with local soil/rock and the surface reseeded with the desires of the landowner. It is furthermore proposed that the impacted soils in the north pit be placed in the pit and encapsulated along with the drill pit contents and the excavated are tested to

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verify achievement of the NMOCD remedial goals. A final C-144 and supporting documentation will be submitted to the NMOCD upon completion of the project.

This proposal will be implemented upon approval by the NMOCD and consensus with the New Mexico State Land Office.

Please direct all official communications to:

Chevron USA

Jim Duke, Construction Representative

PO Box 1949

Eunice, New Mexico 88231

Telephone: 505.394.1237

Email: LDuk@chevron.com

Should you have any questions or concerns, please call Iain Olness or myself at (505) 394-3481. Jim Duke can be contacted at (505) 394-1237 or via e-mail at <u>LDuk@chevron.com</u>.

Sincerely,

ENVIRONMENTAL PLUS, INC.

Pat McCasland

Environmental Consultant

cc: Wa

Wayne Price, NMOCD Santa Fe

Jim Duke, Chevron USA

Wayne Minchew, Chevron USA

Thaddeus Kostrubala, State of New Mexico

file

Enclosures:

Topographical Map

Site Location Map

Site Map

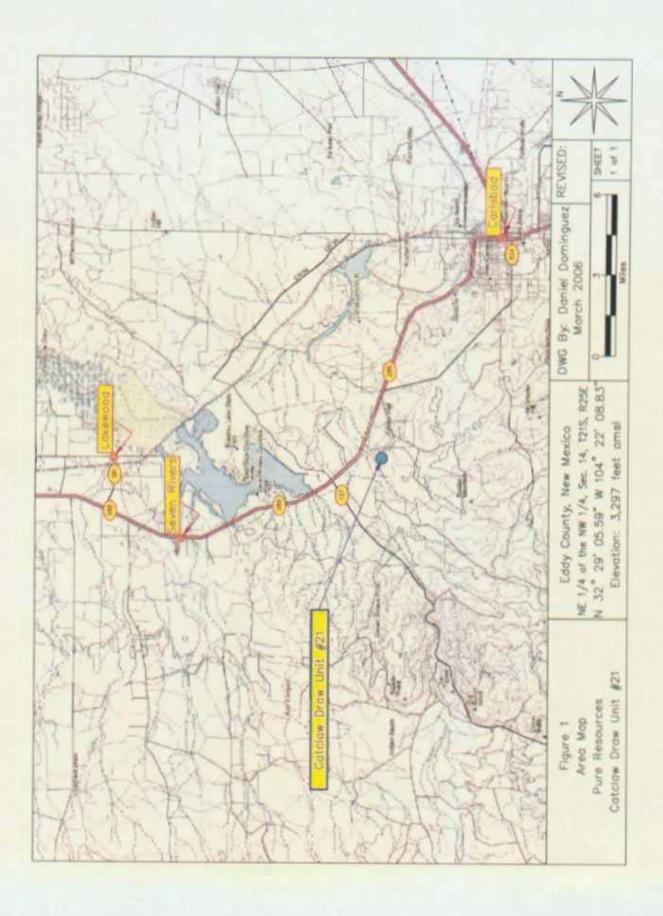
Groundwater Map Well Data - Table 1

Analytical Results Summary - Table 2

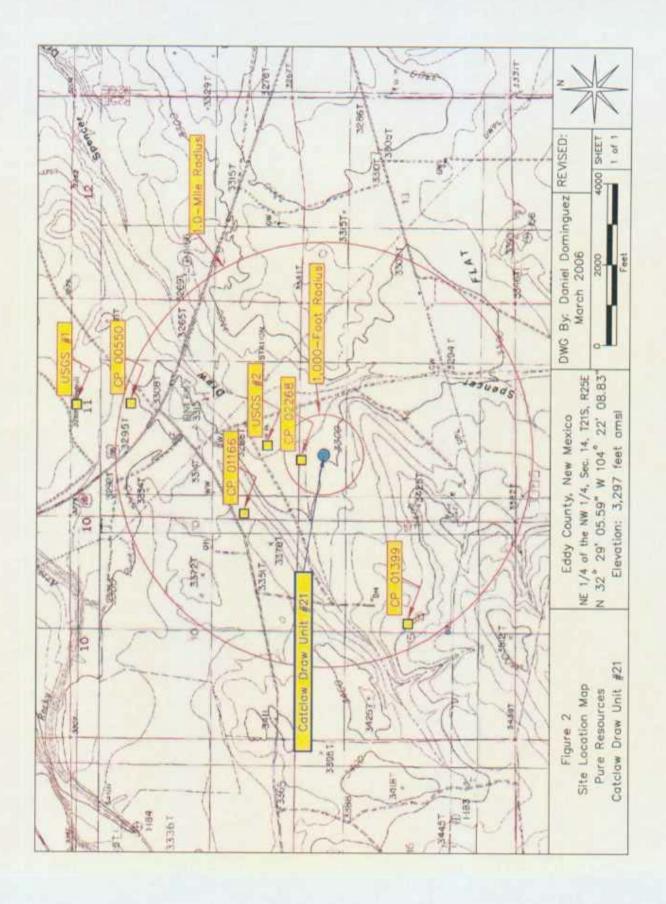
Photographs

NMOCD Form C-144

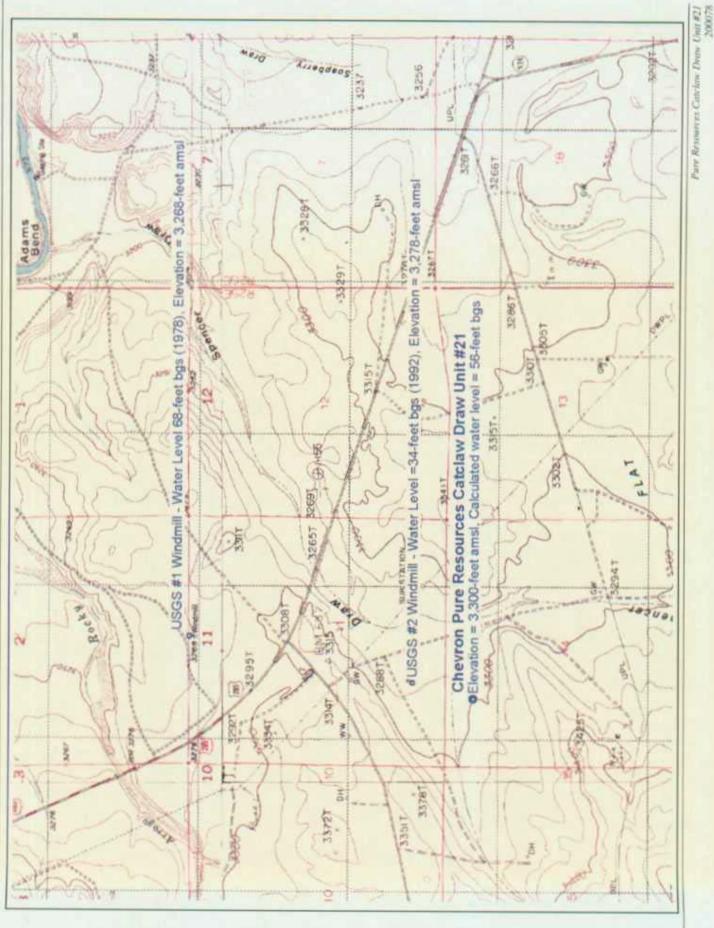




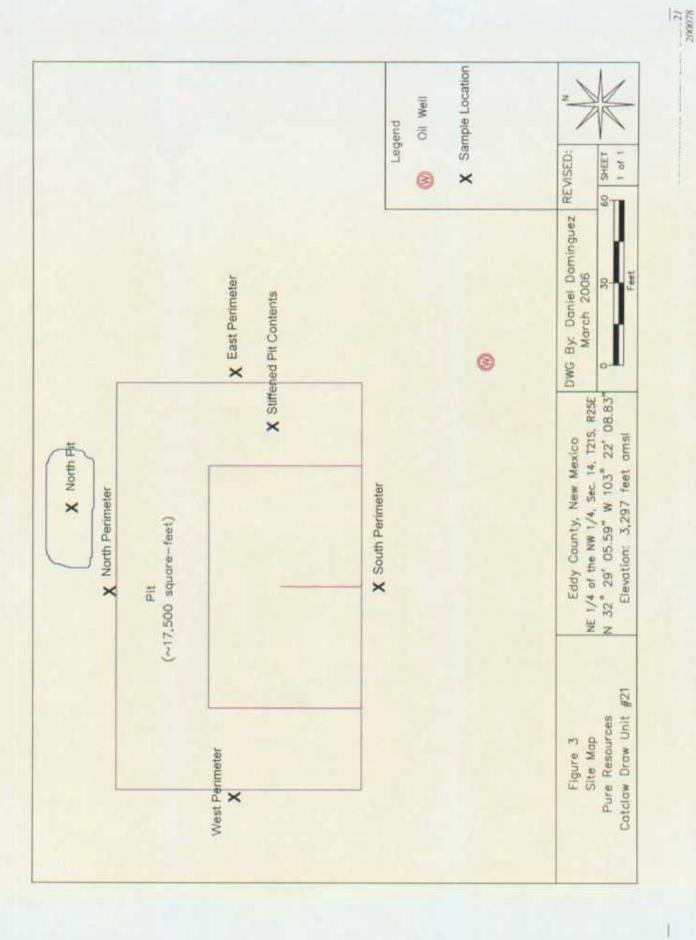














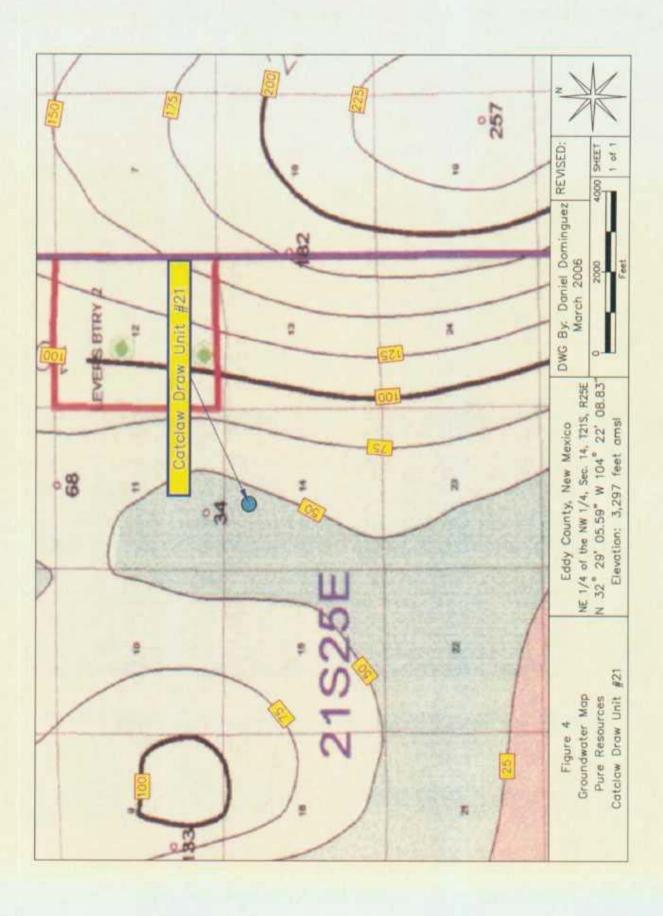




TABLE 1 WELL INFORMATION REPORT*

Pure Resources Catclaw Draw Unit #21 - Ref #200078

Well Number	Diversion ^A	Owner	Use	Twsp	Rng	Sec d d d	Latitude	Longitude	Date	Surface	Depth to Water
									Measured	Elevation	(ft bgs)
C 00550	3	WILL TRUITT	STK	21S	25E	11 2 1 1	N32° 29' 53.01"	W104° 21' 54.62"	12-Apr-56	3,294	
C 01166	3	WILMA D. TRUITT	PRO	215	25E	11 31	N32° 29' 25.22"	W104° 22' 25.95"		3,360	
C 02268 ^C	0	WILMA D. TRUITT	STK	215	25E	11 341	N32° 29' 11.43"	W104° 22' 10.66"	31-Dec-41	3,282	25
C 01399	3	MORAN OIL P.& D. CORP.	PRO	215	25E	15 233	N32° 28' 45.23"	W104° 22' 57.13"	10.75	3,404	
USGS #1				215	25E	11 2 1 1			12-Jan-78	3,268	66.79
JSGS #2				215	25E	11 343			20-Nov-92	3,278	34.09
01451	3	WATTS LAND & CATTLE	STK	215	25E	22 33	N32° 27' 26.37"	W104° 23' 28.16"	06-Jun-71	3,404	260

* = 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 = Interpolated from USGS Topographical Map

c = Wells C-02268 and USGS #1 are probably the same well. Well C-02268 could not be located in the field.

STK = 72-12-1 Livestock watering

PRO = 72-12-1 Prospecting or development of natural resource

(quarters are 1=NW, 2=NE, 3=SW, 4=SE) (quarters are biggest to smallest - X Y are in Fect - UTM are in Meters) Shaded area indicates wells not shown on Figure 2

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Chevron USA TABLE 2

			S	Catclaw Draw #21 Pit Analytical Results Summary	w #21]	Pit Analy	rtical Re	sults Su	mmary			
Sample Location	Sampling Interval (FT. BGS ⁴)	SAMPLE ID#	Date	Lithology	Status	GRO³ mg/Kg	DRO⁴ mg/Kg	TPH ⁵ mg/Kg	BTEX mg/Kg	Benzene mg/Kg	Tolucne mg/Kg	Ehtylbenzene mg/Kg
East Perimeter	8-9	East Perimeter	7/28/2006	Caliche	in-situ	<10.0	<10.0	<10.0	<0.015	<0.005	<0.005	<0.005
West Perimeter	8-9	West Perimeter	7/28/2006	Caliche/Rock	in-situ	<10.0	<10.0	<10.0	<0.015	<0.005	<0.005	<0.005
South Perimeter	8-9	South Perimeter	7/28/2006	Caliche	in-situ	<10.0	<10.0	<10.0	<0.015	<0.005	<0.005	<0.005
North Perimeter	8-9	North Perimeter	7/28/2006	Caliche/Rock	in-situ	<10.0	<10.0	<10.0	0.010	<0.005	0.010	<0.005
Stiffened Pit Contents	4	Stiffened Pit Contents	7/28/2006	Sand	in-situ	<10.0	583	583	0.007	<0.005	0.007	<0.005
North Pit	0-1	North Pit	7/28/2006	Clayey Sand	in-situ	<10.0	<10.0	<10.0	<0.015	<0.005	<0.005	<0.005
		New Mexico Oil	Conservation	New Mexico Oil Conservation Division Remedial Goals	ial Goals			1,000	50	10		

²VOC-Volatile Organic Contaminants/Constituents

³GRO-Gasoline Range Organics C₆-C₁₀

⁴DRO-Diesel Range Organics C₁₀-C₂₈

*TPH-Total Petroleum Hydrocarbon = GRO+DRO.

'Boided values are in excess of the New Mexico Oil Conservation Division guideline threshold for the parameter

(--) indicates the sample was not collected due to refusal. Italicized values are < the instrument detection limit. na - Not Analyzed

Reported detection limits are considered "de minimus" values and are included in the GRO/DRO and BTEX summations.

WQCC - (New Mexico Water Quality Control Commission) Chloride residuals cannot be capable of impacting local groundwater in excess of the 250 mg/L WQCC standard.



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: 07/28/06 Reporting Date: 08/01/06

Project Owner: CHEVRON TEXACO (#200078)
Project Name: CATCLAW DRAW #21 PIT

Project Location: NOT GIVEN

Sampling Date: 07/28/06 Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: BC

Analyzed By: BC

LAB NO. SAMPLE ID	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE	07/31/06	07/31/06	07/31/06	07/31/06
H11395-1 EAST PERIMETER	<0.005	<0.005	<0.005	<0.015
H11395-2 WEST PERIMETER	<0.005	<0.005	< 0.005	<0.015
H11395-3 SOUTH PERIMETER	<0.005	0.005	< 0.005	<0.015
H11395-4 NORTH PERIMETER	<0.005	0.010	< 0.005	<0.015
H11395-5 STIFFENED PIT CONTENTS	<0.005	0.007	< 0.005	<0.015
H11395-6 NORTH PIT	<0.005	<0.005	<0.005	<0.015
Quality Control	0.100	0.105	0.106	0.299
True Value QC	0.100	0.100	0.100	0.300
% Recovery	99.6	105	106	99.7
Relative Percent Difference	<0.1	6.7	7.8	2.0

METHOD: EPA SW-846 8260

()

Date

PLEASE NOTE: Liability and Damagea. Cordinal'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 intuitysts: All claims, including those for regitigence 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. By early expectable cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its substitutes, affiliates of 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.





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: 07/28/06

Reporting Date: 08/01/06

Project Owner: CHEVRON TEXACO (#200078)
Project Name: CATCLAW DRAW #21 PIT

Project Location: NOT GIVEN

Sampling Date: 07/28/06

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: BC Analyzed By: BC/AB

	GRO	DRO	
	(C_6-C_{10})	(>C ₁₀ -C ₂₈)	CI*
LAB NUMBER SAMPLE ID	(mg/Kg)	(mg/Kg)	(mg/Kg)

ANALYSIS I	DATE	07/31/06	07/31/06	07/31/06
H11395-1	EAST PERIMETER	<10.0	<10.0	160
H11395-2	WEST PERIMETER	<10.0	<10.0	64
H11395-3	SOUTH PERIMETER	<10.0	<10.0	864
H11395-4	NORTH PERIMETER	<10.0	<10.0	62
H11395-5	STIFFENED PIT CONTENTS	<10.0	583	42000
H11395-6	NORTH PIT	<10.0	<10.0	1280
Quality Con	trol	780	770	990
True Value	QC	800	800	1000
% Recovery		97.5	96.2	99.0
Relative Per	cent Difference	0.9	7.2	1.0

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; Cl⁻: Std. Methods 4500-Cl⁻B *Analyses performed on 1:4 w:v aqueous extracts.

H11395A

PLEASE NOTE: Liability and Damagos. Cardinal's liability and client's exclusive remedy for any claim arising, whather based in contract or tort, shall be limited to the amount paid by client for modification.

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 substituties, 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.

1 of 1

Please use at least 500 grams of sample for extraction for chloride test. Left \mathcal{M}



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

202-383-2326	505-393-2326 Fax 505-393-2476			91	29-67	915-673-7001	5	Fax	915	Fax 915-673-7020												
Company Name	Environmental Plus, I	Inc.						m	Bill To	0			200	A	NAL	YS!	SR	ANALYSIS REQUEST	ES			
EPI Project Manager	ager Pat McCasland			L									Г	Н	H	H	_	L				
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City, State, Zip	Eunice New Mexico 8	88231					ວ	ē	õ	Chevron USA											aller som	
EPI Phone#/Fax#	# 505-394-3481 / 505-394-2601	94-2601					۳.	O. E	300	P. O. Box 1949				-			-					
Client Company	Chevron USA					Ш	<u>=</u>	9	Ž	Funice NM 88231				-		-	*****		18.47	esumes.		
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M11395-1 1	1 East Perimeter	G 2	Н	×				Ĥ	×	7/28/06	10:00	×	×	×	H	┝	H	H	L			Ι
-22	2 West Perimeter	G 2	Н	×			Н	Ĥ	×	7/28/06	10:15	×	×	×	H	H	_	L				Γ
733	3 South Perimeter	G 2	_	×			Н	Ĥ	×	7/28/06	10:30	×	×	×	H	H	H	L	L			
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Sample A elline & de	Date 7-28-08 Time	Received By:						<u> </u>	AX RE	Fax Results To Pat McCasland - EPI @ 505-394-2601 REMARKS: Chain of custody requested. Send individual records to Par	t McCasta	- pu	id id	505	394	2601	2	EPI @ 505-394-2601	ā			Т
Relinqui 78d by	PAPA (Inb staff)	Received By:	(lab st	aff)	1			Τ.			nonho fami		5	8		5 L	2	asiand	i i			



Photograph #1- Lease sign.



Photograph #2 - Pit and berm looking southeast.



Photograph #3 - Pit and berm looking southeast.



Photograph #4 - Pit and berm looking southeast.

<u>District I</u> 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 1220 S. St. Francis Dr., Santa Fe, NM 87505

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State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

Form C-144 June 1, 2004 For drilling and production facilities, submit to appropriate NMOCD District Office. For downstream facilities, submit to Santa Fe office

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered Type of action: Registration of a pit or below-grad	by a "general plan"? Yes ⊠ I e tank ☐ Closure of a pit or below-grade to	No □ ank ⊠						
		s: LDuk@chevron.com						
Address: PO Box 1949 2401 Avenue O Eunice, New Mexico 88231		70 C 2 C 2 C 2 C 2 C 2 C 2 C 2 C 2 C 2 C						
Facility or well name: Catclaw Draw Unit #21 API #: 30-025-33762 Unit I	etter (UL): C Qtr/Qtr: NE¼ NW¼	Section: 14, T21S, R25E						
County: Eddy Latitude: N 32°29'05.59" Longitude: W 104°22'08.83" N	NAD: 1927 ☐ 1983 ☐ WGS 84 🗵	5. Web-10.						
Surface Owner: Federal ☐ State ☒ Private ☐ Indian ☐								
Pit	Below-grade tank							
Type: Drilling ☑ Production ☐ Disposal ☐ Workover ☐ Emergency ☐	Volume: bbl Type of fluid:	ita x						
Lined 🛮 Unlined 🗆	Construction material:							
Liner type: Synthetic ☑ Thickness 12 mil Clay ☐	Double-walled, with leak detection? Yes	☐ If not, explain why not.						
Pit Volume: ~3,000 bbl								
Depth to ground water (vertical distance from bottom of pit to seasonal high water	Less than 50 feet	(20 points)						
elevation of ground water.) ~56'bgs	50 feet or more, but less than 100 feet	(10 points)						
	100 feet or more	(0 points)						
Wellhead protection area: (Less than 200 feet from a private domestic water	Yes	(20 points)						
source, or less than 1000 feet from all other water sources.)	No	(0 points)						
	Less than 200 feet	(20 points)						
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.) 200 feet or more, but less than 1,000 feet (10 points)								
canals, ditches, and perennial and ephemeral watercourses.) 1,000 feet or more (0 points)								
Ranking Score (Total Points) 10								
If this is a pit closure: (1) Attach a diagram of the facility showing the pit's relations	hip to other equipment and tanks. (2) Indicate	te disposal location: (check the onsite box						
if your are burying in place) onsite 🖾 offsite 🔲 If offsite, name of facility	(3) Attach a genera	l description of remedial action taken						
including remediation start date and end date. (4) Groundwater encountered: No \boxtimes Y	es 🔲 If yes, show depth below ground surf	faceft. and attach sample results.						
(5) Attach soil sample results and a diagram of sample locations and excavations.								
Additional Comments: It is proposed to close this pit consistent with the "ChevronT	exaco Drilling and Reserve Pit Closure Gene	ral Plan, December 2004" and the						
NMOCD Pit and Relow-Grade Tank Guidelines November 1, 2004 as promulasted		Additional Comments: It is proposed to close this pit consistent with the "ChevronTexaco Drilling and Reserve Pit Closure General Plan, December 2004" and the						
NMOCD Pit and Below-Grade Tank Guidelines, November 1, 2004 as promulgated under NMOCD Rule 50 (19.15.2.50 NMAC).								
Pit Status: Liner intact Liner punctured or torn	under NMOCD Rule 50 (19.15.2.50 NMAC)).						
Pit Status: Liner intact ☑ Liner punctured or torn □	. Encapsulation will consist of mixing earth	nen materials with the pit contents, as						
Pit Status: Liner intact Liner punctured or torn Method of Closure: The contents of the pit will be stiffened and encapsulated on site	Encapsulation will consist of mixing earth bort the pit cover. Upon the pit contents being	nen materials with the pit contents, as a stiffened as required, the edges of the						
Pit Status: Liner intact Liner punctured or torn Method of Closure: The contents of the pit will be stiffened and encapsulated on site necessary to stiffen the pit contents sufficiently to provide physical stability and support of the pit contents.	Encapsulation will consist of mixing earth out the pit cover. Upon the pit contents being be covered with a 20-mil thick impervious, re	nen materials with the pit contents, as a stiffened as required, the edges of the sinforced synthetic or fabricated liner						
Pit Status: Liner intact Liner punctured or torn Method of Closure: The contents of the pit will be stiffened and encapsulated on site necessary to stiffen the pit contents sufficiently to provide physical stability and suppliner will be folded over the edges of the stiffened mud and cuttings and the pit will be	Encapsulation will consist of mixing earth out the pit cover. Upon the pit contents being be covered with a 20-mil thick impervious, re	nen materials with the pit contents, as a stiffened as required, the edges of the sinforced synthetic or fabricated liner						
Pit Status: Liner intact Liner punctured or torn Method of Closure: The contents of the pit will be stiffened and encapsulated on site necessary to stiffen the pit contents sufficiently to provide physical stability and suppliner will be folded over the edges of the stiffened mud and cuttings and the pit will be meeting ASTM standards that is designed to be resistant to the material encapsulated	e. Encapsulation will consist of mixing earth port the pit cover. Upon the pit contents being the covered with a 20-mil thick impervious, real. The liner will then be covered with a mining wheeling and belief. I further certify that the	nen materials with the pit contents, as a stiffened as required, the edges of the inforced synthetic or fabricated liner num of three feet of clean soil or like e above-described pit or below-grade						
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District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720

District II 811 S. First St., Artesia, NM 88210 Phone: (575) 748-1283 Fax: (575) 748-9720

District III 1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

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 61851

CONDITIONS

Operator:	OGRID:
CHEVRON U S A INC	4323
6301 Deauville Blvd	Action Number:
Midland, TX 79706	61851
	Action Type:
	[C-144] PIT Generic Plan (C-144)

CONDITIONS

Created By		Condition Date
jburdine	OCD staff on 07/22/2022 is not approving but accepting App ID# 61851 submitted on 11/15/2021, for retention of record purposes that previous correspondence in 2006 shows that OCD worked with the operator to approve/disapprove the application for a modified pit closure.	7/22/2022