

Jal Landfarm

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[4323] Chevron
Environmental
Management Company

vH нлнп

From: [Nanny, Ryan](#)
To: [Jones, Brad A., EMNRD](#)
Cc: [Martinez, Armando](#); [Rice, Steve](#); [Schaffer, Alison](#); [Johnson, Sarah](#); [Barnhill, Amy](#); [Gulde, Cynthia](#)
Subject: Jal Landfarm 2024 Q2 Sampling Results - Release Response Notification
Attachments: [image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[April 2024 Vadose Zone Results.xlsx](#)

Good Morning Brad,

Arcadis, on behalf of Chevron EMC, recently conducted the first semiannual sampling event at the Jal Landfarm (NM02-0012). The vadose zone analytical results are attached.

During the sampling event, two sets of vadose zone samples (15 samples total) were inadvertently submitted to a different Eurofins laboratory for GRO analysis. As a result, a different method was used for those 2 SDGs (SW846 8015B NM vs. SW846 8015D). Both methods are appropriate for GRO analysis; however, given our low background soil concentration for GRO, method 8015D is able to achieve lower MDLs compared to method 8015B (e.g., 3.56 mg/kg vs. 10.9 mg/kg, respectively). In addition, all of the GRO results using method 8015B were estimated values and/or were flagged for blank contamination. The GRO results using method 8015B ranged from 13.3 mg/kg to 46.7 mg/kg (15 samples), whereas the GRO results using method 8015D ranged from 2.69 to 3.59 mg/kg (13 samples).

Arcadis understands that Chevron is required to perform release response sampling for the 15 samples that exceeded the GRO background soil concentration (0.0822 mg/kg) even if the concentrations are J flagged and below the Part 29 standards. However, since the GRO results using method 8015B are estimated and inconsistent with those results using method 8015D, Arcadis will remobilize to the site to recollect/reanalyze vadose soil from the locations with GRO exceedances and perform limited release response sampling from the locations with chloride exceedances pursuant to the requirements outlined in 19.15.36.15.E(5) NMAC. The recollected samples will be analyzed for GRO using method 8015D to verify the previous GRO exceedances and determine if additional release response sampling needs to be performed. For release response sampling, up to four discrete samples will be collected around each chloride exceedance and analyzed for TPH, BTEX, chloride, and the constituents listed in Subsection A and B of 20.6.2.3103 NMAC (including toxic pollutants).

A summary of background soil concentration exceedances from the April 2024 event and the plan for release response sampling/reanalysis is provided below.

April 2024 Exceedances of Background Soil Concentrations

- Cell 17, Square 43: chloride and GRO
- Cell 17, Square 25: chloride and GRO
- Cell 17, Square 5: chloride and GRO
- Cell 18, Square 141: chloride

- 13 other samples: GRO using method 8015B

Plan for Release Response Sampling/Reanalysis

Release Response Samples (10 samples):

- Cell 17, Square 4
- Cell 17, Square 6
- Cell 17, Square 24
- Cell 17, Square 44
- Cell 17, Square 64
- Cell 18, Square 63
- Cell 18, Square 120
- Cell 18, Square 140
- Cell 18, Square 142
- Cell 21, Square 194

Vadose Zone Re-Sample for GRO Analysis (13 samples):

- Cell 17, Square 201
- Cell 21, Square 98
- Cell 21, Square 120
- Cell 21, Square 124
- Cell 21, Square 126
- Cell 25, Square 81
- Cell 25, Square 120
- Cell 25, Square 151
- Cell 25, Square 184
- Cell 26, Square 41
- Cell 26, Square 85
- Cell 26, Square 151
- Cell 26, Square 175

Please let us know if you have any questions or concerns. Per your request, we will upload this email onto the OCD pay portal.

Thank you Brad!

Joel Ryan Nanny PG

Certified Project Manager

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

CONDITIONS

Action 367858

CONDITIONS

Operator: CHEVRON U S A INC 6301 Deauville Blvd Midland, TX 79706	OGRID: 4323
	Action Number: 367858
	Action Type: [C-137] Non-Fee SWMF Submittal (SWMF NON-FEE SUBMITTAL)

CONDITIONS

Created By	Condition	Condition Date
jeffrey.harrison	Accepted for records retention only. Releases to vadose zone at landfarm cells being addressed and remediated under incident #NAPP2113741693	1/29/2025