

## Hamlet, Robert, EMNRD

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**From:** Hamlet, Robert, EMNRD  
**Sent:** Monday, July 29, 2019 3:58 PM  
**To:** 'Michelson, Jason C'  
**Cc:** Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD  
**Subject:** RE: Donaldson Com A Well No. 1, 2RP-4605, 2RP-4412, 2RP-4578

Jason,

Unfortunately, at least one of the three spills appears to have occurred before a liner was put in the tank battery. The OCD needs sampling completed to see what type of contamination levels we're looking at. Any spill that is <50' to groundwater is considered to be potentially dangerous to groundwater and the environment. After the Remediation Plan and delineation samples have been submitted, we will have a better understanding of the depth of contamination.

This one is different from the other spills, due to the fact that the spill has not been delineated or lab sample data sent in.

Unfortunately, RockCliff should have addressed this a long time ago.

Regards,

Robert J Hamlet  
State of New Mexico  
Energy, Minerals, and Natural Resources  
Oil Conservation Division  
811 S. First St., Artesia NM 88210  
(575) 840-5963  
[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

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**From:** Michelson, Jason C <JMichelson@chevron.com>  
**Sent:** Monday, July 29, 2019 2:45 PM  
**To:** Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>  
**Subject:** [EXT] RE: Donaldson Com A Well No. 1, 2RP-4605, 2RP-4412, 2RP-4578

Do you have time to discuss.

Jason

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**From:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>  
**Sent:** Monday, July 29, 2019 3:40 PM  
**To:** Michelson, Jason C <[JMichelson@chevron.com](mailto:JMichelson@chevron.com)>; Andresen, Rebecca <[rebecca.andresen@arcadis.com](mailto:rebecca.andresen@arcadis.com)>  
**Cc:** Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Krehbiel, Brett <[Brett.Krehbiel@arcadis.com](mailto:Brett.Krehbiel@arcadis.com)>  
**Subject:** [\*\*EXTERNAL\*\*] RE: Donaldson Com A Well No. 1, 2RP-4605, 2RP-4412, 2RP-4578

Jason,

Due to the sensitive nature of this spill site, we will need to have a work plan with delineation sampling ASAP. The **email on June 24<sup>th</sup>** below discusses the immediate steps that need to be taken to begin constructing a work plan with delineation sampling. With the depth to groundwater being <50' it is unlikely that a deferral will be granted for this spill site.

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**From:** Michelson, Jason C <[JMichelson@chevron.com](mailto:JMichelson@chevron.com)>  
**Sent:** Monday, July 29, 2019 12:10 PM  
**To:** Andresen, Rebecca <[rebecca.andresen@arcadis.com](mailto:rebecca.andresen@arcadis.com)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>  
**Cc:** Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Krehbiel, Brett <[Brett.Krehbiel@arcadis.com](mailto:Brett.Krehbiel@arcadis.com)>  
**Subject:** [EXT] RE: Donaldson Com A Well No. 1, 2RP-4605, 2RP-4412, 2RP-4578

Rob,

Can a 12 month extension be granted for this location until abandonment activities take place? We are currently still reviewing the site data and if it is sufficient, the plan will be remediate soil impacts. The other option will be to submit an Assessment Work Plan following completion of abandonment activities.

Thanks,

**Jason C. Michelson**

Project Manager  
Upstream-East

**Chevron Environmental Management Company**

1500 Louisiana Street, Office 38116  
Houston, Texas 77002  
Office: 832-854-5601  
Cell: 281-660-8564  
[jmichelson@chevron.com](mailto:jmichelson@chevron.com)

**"Do it right or not at all"**

**The KEY to success is to "Prioritize"  
and "Plan Your Work",  
then effectively "Work Your Plan".**

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**From:** Andresen, Rebecca <[Rebecca.Andresen@arcadis.com](mailto:Rebecca.Andresen@arcadis.com)>

**Sent:** Thursday, June 27, 2019 11:57 AM

**To:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>

**Cc:** Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>;  
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Best,  
Rebecca

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**From:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>

**Sent:** Monday, June 24, 2019 2:30 PM

**To:** Andresen, Rebecca <[Rebecca.Andresen@arcadis.com](mailto:Rebecca.Andresen@arcadis.com)>

**Cc:** Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>;  
'Jason Michelson' <[JMichelson@chevron.com](mailto:JMichelson@chevron.com)>

**Subject:** RE: Donaldson Com A Well No. 1, 2RP-4605, 2RP-4412, 2RP-4578

Rebecca,

Looking at these three spills at the Donaldson Com A #1, they all have one thing in common. All three C-141's mentioned that the water was contained within the containment. 2RP-4579 mentions earthen firewall (containment) and 2RP-4605 mentions a lined containment. I'm not sure if there was a liner on this well throughout. If a liner is present, it will need to be removed to sample underneath. We are going to need some samples taken in the berm itself (evenly spaced) to verify the contaminant levels. Please make sure a couple of the samples go deep enough to vertically delineate the chloride contaminants if present. Also, take some samples around the perimeter of the berm to verify that produced water did not leak out of the containment.

If there are contaminants in the berm, the contaminated soil will need to be excavated due to the sensitive nature of this location. Looking at the NM OCD Environmental Map, the depth to groundwater in this area appears to be very shallow (30-40').

If you feel the depth to groundwater is >50', a shallow borehole can be drilled to 55' allowing for verification of the depth. If water is not visible after reaching bottom-hole and waiting 72 hours, sample points would be allowed for deferral.

Since, all three spills supposedly occurred within the containment area and overlap, we will treat this as one spill. And defer or close all three together.

Please, let me know if you decide to drill a borehole or have any questions.

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**From:** Andresen, Rebecca <[Rebecca.Andresen@arcadis.com](mailto:Rebecca.Andresen@arcadis.com)>  
**Sent:** Thursday, June 13, 2019 2:49 PM  
**To:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>  
**Cc:** Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; 'Jason Michelson' <[JMichelson@chevron.com](mailto:JMichelson@chevron.com)>  
**Subject:** [EXT] Donaldson Com A Well No. 1, 2RP-4605, 2RP-4412, 2RP-4578

Mr. Hamlet,  
Please find attached a Site Deferral Letter regarding NMOCD Case No. 2RP-4605, 2RP-4412, and 2RP-4578. NMOCD was notified of releases at this location in November 2017, February 2019, and March 2019. A Release Characterization Work Plan was submitted to the NMOCD in November 2018, but it is uncertain if the work plan was implemented. Chevron acquired the lease for this well in October 2018 and is planning to plug and abandon the well. We are respectfully requesting to defer site investigation and remediation activities until the facility is decommissioned.

Please let us know if you have questions.

Best Regards,

**Rebecca Andresen, P.G.** | Vice President | [rebecca.andresen@arcadis.com](mailto:rebecca.andresen@arcadis.com)  
**Arcadis** | 1100 Olive Way, Suite 800, Seattle, WA | 98101 | USA  
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**Hamlet, Robert, EMNRD**

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**From:** Andresen, Rebecca <Rebecca.Andresen@arcadis.com>  
**Sent:** Thursday, June 27, 2019 10:57 AM  
**To:** Hamlet, Robert, EMNRD  
**Cc:** Venegas, Victoria, EMNRD; Bratcher, Mike, EMNRD; 'Jason Michelson'; Krehbiel, Brett  
**Subject:** [EXT] RE: Donaldson Com A Well No. 1, 2RP-4605, 2RP-4412, 2RP-4578

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**Bratcher, Mike, EMNRD**

---

**From:** Melodie Sanjari <melodie.sanjari@soudermiller.com>  
**Sent:** Monday, August 13, 2018 1:24 PM  
**To:** Bratcher, Mike, EMNRD  
**Cc:** Austin Weyant  
**Subject:** 48 Hour Notice 2RP-4605 19.15.29.12(D)(1)a  
**Attachments:** SCB Injection Facility Sample Locations.jpg

Good Afternoon Mr. Bratcher,

SMA field personnel will be onsite at the SCB Injection Facility and collecting closure samples for the above RP from the hours of 7:30 to 10:30 on Thursday, August 16<sup>th</sup>. We plan to sample the locations depicted on figure attached. SMA plans to use a sampling method as described in EPA's Final Sampling Guidance for SW-846 2002. SMA has chosen this sampling design because this location is a uniform soil type, all three releases were contained within a bermed area thus reducing the possibility of migration, and there are several operational considerations that preclude the implementation of a different statistical design.

Thank you in advance for your time sir.

Best,

**Melodie Sanjari**  
*Staff Scientist*

**Souder, Miller & Associates**

Engineering ♦ Environmental ♦ Surveying  
201 S Halagueno Street  
Carlsbad, NM 88220  
[www.soudermiller.com](http://www.soudermiller.com)  
(574) 370-9782 (cell)



# SCB Injection Facility

Sample Locations



Survey



100 ft



**Bratcher, Mike, EMNRD**

---

**From:** Melodie Sanjari <melodie.sanjari@soudermiller.com>  
**Sent:** Wednesday, September 12, 2018 10:29 AM  
**To:** Bratcher, Mike, EMNRD  
**Cc:** John Turner; Austin Weyant  
**Subject:** 48 Hour Notice - Liner Inspection 2RP-4605

Good Morning,

This email is to inform all interested parties that SMA will be conducting a liner integrity inspection at the SCB Injection Facility (location associated with 2RP-4605) beginning at approximately 9 a.m. on September 17, 2018 per NMAC 19.15.29.12 (D)(1)a. This email will serve as our 48 hour notification. We will send an update if this time or date changes.

Please don't hesitate to call if you have any questions or concerns.

Thank you,

**Melodie Sanjari**  
*Staff Scientist*

**Souder, Miller & Associates**

Engineering ♦ Environmental ♦ Surveying  
201 S Halagueno Street  
Carlsbad, NM 88220  
[www.soudermiller.com](http://www.soudermiller.com)  
(574) 370-9782 (cell)  
(505) 299-0942 Ext. 2204



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**Venegas, Victoria, EMNRD**

---

**From:** Hamlet, Robert, EMNRD  
**Sent:** Monday, July 29, 2019 3:58 PM  
**To:** Michelson, Jason C  
**Cc:** Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD  
**Subject:** RE: Donaldson Com A Well No. 1, 2RP-4605, 2RP-4412, 2RP-4578

Jason,

Unfortunately, at least one of the three spills appears to have occurred before a liner was put in the tank battery. The OCD needs sampling completed to see what type of contamination levels we're looking at. Any spill that is <50' to groundwater is considered to be potentially dangerous to groundwater and the environment. After the Remediation Plan and delineation samples have been submitted, we will have a better understanding of the depth of contamination.

This one is different from the other spills, due to the fact that the spill has not been delineated or lab sample data sent in.

Unfortunately, RockCliff should have addressed this a long time ago.

Regards,

Robert J Hamlet  
State of New Mexico  
Energy, Minerals, and Natural Resources  
Oil Conservation Division  
811 S. First St., Artesia NM 88210  
(575) 840-5963  
[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

---

**From:** Michelson, Jason C <JMichelson@chevron.com>  
**Sent:** Monday, July 29, 2019 2:45 PM  
**To:** Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>  
**Subject:** [EXT] RE: Donaldson Com A Well No. 1, 2RP-4605, 2RP-4412, 2RP-4578



Do you have time to discuss.

Jason

---

**From:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>  
**Sent:** Monday, July 29, 2019 3:40 PM  
**To:** Michelson, Jason C <[JMichelson@chevron.com](mailto:JMichelson@chevron.com)>; Andresen, Rebecca <[rebecca.andresen@arcadis.com](mailto:rebecca.andresen@arcadis.com)>  
**Cc:** Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Krehbiel, Brett <[Brett.Krehbiel@arcadis.com](mailto:Brett.Krehbiel@arcadis.com)>  
**Subject:** [\*\*EXTERNAL\*\*] RE: Donaldson Com A Well No. 1, 2RP-4605, 2RP-4412, 2RP-4578

Jason,

Due to the sensitive nature of this spill site, we will need to have a work plan with delineation sampling ASAP. The **email on June 24<sup>th</sup>** below discusses the immediate steps that need to be taken to begin constructing a work plan with delineation sampling. With the depth to groundwater being <50' it is unlikely that a deferral will be granted for this spill site.

Regards,

Robert J Hamlet  
State of New Mexico  
Energy, Minerals, and Natural Resources  
Oil Conservation Division  
811 S. First St., Artesia NM 88210  
(575) 840-5963  
[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)

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---

**From:** Michelson, Jason C <[JMichelson@chevron.com](mailto:JMichelson@chevron.com)>  
**Sent:** Monday, July 29, 2019 12:10 PM  
**To:** Andresen, Rebecca <[rebecca.andresen@arcadis.com](mailto:rebecca.andresen@arcadis.com)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>  
**Cc:** Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Krehbiel, Brett <[Brett.Krehbiel@arcadis.com](mailto:Brett.Krehbiel@arcadis.com)>  
**Subject:** [EXT] RE: Donaldson Com A Well No. 1, 2RP-4605, 2RP-4412, 2RP-4578

Rob,

Can a 12 month extension be granted for this location until abandonment activities take place? We are currently still reviewing the site data and if it is sufficient, the plan will be remediate soil impacts. The other option will be to submit an Assessment Work Plan following completion of abandonment activities.

Thanks,

**Jason C. Michelson**

Project Manager  
Upstream-East

**Chevron Environmental Management Company**

1500 Louisiana Street, Office 38116  
Houston, Texas 77002  
Office: 832-854-5601  
Cell: 281-660-8564  
[jmichelson@chevron.com](mailto:jmichelson@chevron.com)

**"Do it right or not at all"**

**The KEY to success is to "Prioritize"  
and "Plan Your Work",  
then effectively "Work Your Plan".**

---

**From:** Andresen, Rebecca <[Rebecca.Andresen@arcadis.com](mailto:Rebecca.Andresen@arcadis.com)>

**Sent:** Thursday, June 27, 2019 11:57 AM

**To:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>

**Cc:** Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>;  
Michelson, Jason C <[JMichelson@chevron.com](mailto:JMichelson@chevron.com)>; Krehbiel, Brett <[Brett.Krehbiel@arcadis.com](mailto:Brett.Krehbiel@arcadis.com)>

**Subject:** [\*\*EXTERNAL\*\*] RE: Donaldson Com A Well No. 1, 2RP-4605, 2RP-4412, 2RP-4578

Thank you for your quick review of these documents. Since submittal of the letters, Chevron has scheduled abandonment of the Donaldson Com A well. Plugging and abandonment, as well as decommissioning of the facilities is expected to be completed within the next few months. As part of the decommissioning activities, the facilities crews will remove visually stained soils. Once the abandonment and decommissioning work is complete, Chevron will submit a work plan for further assessment, including the activities suggested below. We are respectfully requesting an extension for submittal of the work plan.

Best,  
Rebecca

---

**From:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>

**Sent:** Monday, June 24, 2019 2:30 PM

**To:** Andresen, Rebecca <[Rebecca.Andresen@arcadis.com](mailto:Rebecca.Andresen@arcadis.com)>

**Cc:** Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>;  
'Jason Michelson' <[JMichelson@chevron.com](mailto:JMichelson@chevron.com)>

**Subject:** RE: Donaldson Com A Well No. 1, 2RP-4605, 2RP-4412, 2RP-4578

Rebecca,

Looking at these three spills at the Donaldson Com A #1, they all have one thing in common. All three C-141's mentioned that the water was contained within the containment. 2RP-4579 mentions earthen firewall (containment) and 2RP-4605 mentions a lined containment. I'm not sure if there was a liner on this well throughout. If a liner is present, it will need to be removed to sample underneath. We are going to need some samples taken in the berm itself (evenly spaced) to verify the contaminant levels. Please make sure a couple of the samples go deep enough to vertically delineate the chloride contaminants if present. Also, take some samples around the perimeter of the berm to verify that produced water did not leak out of the containment.

If there are contaminants in the berm, the contaminated soil will need to be excavated due to the sensitive nature of this location. Looking at the NM OCD Environmental Map, the depth to groundwater in this area appears to be very shallow (30-40').

If you feel the depth to groundwater is >50', a shallow borehole can be drilled to 55' allowing for verification of the depth. If water is not visible after reaching bottom-hole and waiting 72 hours, sample points would be allowed for deferral.

Since, all three spills supposedly occurred within the containment area and overlap, we will treat this as one spill. And defer or close all three together.

Please, let me know if you decide to drill a borehole or have any questions.

Robert J Hamlet  
State of New Mexico  
Energy, Minerals, and Natural Resources  
Oil Conservation Division  
811 S. First St., Artesia NM 88210  
(575) 840-5963  
[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)

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---

**From:** Andresen, Rebecca <[Rebecca.Andresen@arcadis.com](mailto:Rebecca.Andresen@arcadis.com)>  
**Sent:** Thursday, June 13, 2019 2:49 PM  
**To:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>  
**Cc:** Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; 'Jason Michelson' <[JMichelson@chevron.com](mailto:JMichelson@chevron.com)>  
**Subject:** [EXT] Donaldson Com A Well No. 1, 2RP-4605, 2RP-4412, 2RP-4578

Mr. Hamlet,  
Please find attached a Site Deferral Letter regarding NMOCD Case No. 2RP-4605, 2RP-4412, and 2RP-4578. NMOCD was notified of releases at this location in November 2017, February 2019, and March 2019. A Release Characterization Work Plan was submitted to the NMOCD in November 2018, but it is uncertain if the work plan was implemented. Chevron acquired the lease for this well in October 2018 and is planning to plug and abandon the well. We are respectfully requesting to defer site investigation and remediation activities until the facility is decommissioned.

Please let us know if you have questions.

Best Regards,

**Rebecca Andresen, P.G.** | Vice President | [rebecca.andresen@arcadis.com](mailto:rebecca.andresen@arcadis.com)  
**Arcadis** | 1100 Olive Way, Suite 800, Seattle, WA | 98101 | USA  
T. +1 206 726 4717 | M. +1 206 295 3273

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**Hamlet, Robert, EMNRD**

---

**From:** Andresen, Rebecca <Rebecca.Andresen@arcadis.com>  
**Sent:** Thursday, June 13, 2019 2:49 PM  
**To:** Hamlet, Robert, EMNRD  
**Cc:** Venegas, Victoria, EMNRD; Bratcher, Mike, EMNRD; 'Jason Michelson'  
**Subject:** [EXT] Donaldson Com A Well No. 1, 2RP-4605, 2RP-4412, 2RP-4578  
**Attachments:** Donaldson Com A Well No. 1.pdf

Mr. Hamlet,

Please find attached a Site Deferral Letter regarding NMOCD Case No. 2RP-4605, 2RP-4412, and 2RP-4578. NMOCD was notified of releases at this location in November 2017, February 2019, and March 2019. A Release Characterization Work Plan was submitted to the NMOCD in November 2018, but it is uncertain if the work plan was implemented. Chevron acquired the lease for this well in October 2018 and is planning to plug and abandon the well. We are respectfully requesting to defer site investigation and remediation activities until the facility is decommissioned.

Please let us know if you have questions.

Best Regards,

**Rebecca Andresen, P.G.** | Vice President | [rebecca.andresen@arcadis.com](mailto:rebecca.andresen@arcadis.com)  
**Arcadis** | 1100 Olive Way, Suite 800, Seattle, WA | 98101 | USA  
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Jason Michelson  
Project Manager

**Chevron Environmental  
Management Company**  
1500 Louisiana Street, #38116  
Houston, Texas 77002  
Work: 832-854-5601  
Cell: 281-660-8564  
jmichelson@chevron.com

May 30, 2019

New Mexico Oil Conservation Division, District II  
811 S. First St  
Artesia, NM 88210

**Re: Donaldson Com A Well No. 1  
Site Deferral Request  
NMOCD Case No. 2RP-4605  
NMOCD Case No. 2RP-4412  
NMOCD Case No. 2RP-4578  
Eddy County, New Mexico**

Dear whom it concerns,

Please find enclosed for your files, copies of the following report:

- Donaldson Com A Well No. 1 – May 30, 2019 Site Deferral Letter
- Donaldson Release Characterization Work Plan (C&S Consulting (C&S) Work Plan)

The Release Characterization Waste Plan was prepared by C&S for the 2RP-4412 release on behalf of Rockcliff Operating New Mexico LLC (Rockcliff) and previously submitted to the New Mexico Oil Conservation District (NMOCD) on November 3, 2017. NMOCD accepted the C&S Work Plan with further limitations on January 25, 2018. Two additional releases (2RP-4412 and 2RP-4578) occurred at the site in January 2018. There is no documentation of assessment work for any of these three releases. Chevron acquired the lease for this well location in October 2018.

The Site Deferral Request was prepared by Arcadis U.S., Inc. (Arcadis) on behalf of Chevron Environmental Management Company (CEMC). The associated well and facilities are scheduled for abandonment so CEMC is respectfully requesting written NMOCD approval for deferral of additional site remediation until abandonment activities have been completed.

Please do not hesitate to call Rebecca Andresen with Arcadis at 206-726-4717 or myself at 832-854-5601, should you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Jason Michelson".

Jason Michelson

Encl. Donaldson Com A Well No. 1 - Site Deferral Letter  
Donaldson Com A Well No. 1 – C & S Work Plan

C.C. Brett Krehbiel, Arcadis



Mr. Rob Hamlet  
New Mexico Oil Conservation Division – District II  
Environmental Specialist  
811 S. First St.  
Artesia, NM 88210

Arcadis U.S., Inc.  
630 Plaza Drive  
Suite 100  
Highlands Ranch  
Colorado 80129  
Tel 720 344 3500  
Fax 720 344 3535  
www.arcadis.com

Subject:  
Site Deferral Request  
Donaldson Com A Well No. 1  
NMOCD Case No. 2RP-4605  
NMOCD Case No. 2RP-4412  
NMOCD Case No. 2RP-4578  
Eddy County, New Mexico

ENVIRONMENT

Date:  
May 30, 2019

Contact:  
Rebecca Andresen

Phone:  
206-726-4717

Email:  
Rebecca.Andresen@arcadis  
.com

Our ref:  
B0049810.0000

Dear Mr. Hamlet:

On behalf of Chevron Environmental Management Company (CEMC), Arcadis U.S., Inc. (Arcadis) prepared this Site Deferral Request (Request) for the Donaldson Com A Well No. 1 well, API No. 30-015-22404, located in Eddy County, New Mexico. Rockcliff Operating New Mexico LLC (Rockcliff), the previous owner of this well, notified the New Mexico Oil Conservation District (NMOCD) of releases on November 22, 2017 (2RP-4412), March 3, 2018 (2RP-4605), and February 22, 2018 (2RP-4579). On behalf of Rockcliff, C&S Consulting (C&S) submitted a Release Characterization Work Plan proposing cleanup activities for the November 2017 spill (2RP-4412), dated November 3, 2017 (Attachment 1). The purpose of this request is to provide a brief summary of the historical spills and to request written confirmation of deferral from the NMOCD.

## SITE DESCRIPTION AND BACKGROUND

The following Site description and background section provides an overview of the Site location and description.

The Site is located approximately two (2) miles east of Loving, New Mexico. The site is in Unit F, Section 23, Township 23S, Range 28E, Eddy County, New Mexico, on private land.



Mr. Rob Hamlet  
May 30, 2019

On September 8, 2017, a release was discovered at the Site due to equipment failure from a 2 inch ball valve and swedge located on the triplex pump (2RP-4412). According to the Initial C-141 form, the produced water was contained within containment. Initial response included coordinating with a vacuum truck to remove standing fluids and replacement of the failed ball valve and swedge. The C-141 form indicated that 8 bbls were recovered and disposed of at an approved NMOCD facility. Rockcliff coordinated and submitted the initial C-141 form with NMOCD. On November 17, 2017, C & S Consulting (C&S) submitted a Release Characterization Work Plan (Plan) to NMOCD. The Plan is included as Attachment 1. On January 25, 2018, NMOCD approved the Plan with conditions in an email dated January 25, 2018 (Attachment 2). No further documentation for this release could be located, and it is unclear if the work plan was implemented.

On January 15, 2018, a release was discovered at the Site due to equipment failure from the packing seal on the triplex pump plunger (2RP-4579). According to the Initial C-141 form, the produced water was contained inside the earthen firewall. Initial response included coordinate with a vacuum truck to remove standing fluids and repairs were made to the failed equipment. The C-141 form indicates approximately 79 bbls were recovered and disposed of at an NMOCD approved facility. Rockcliff coordinated and submitted the initial C-141 form with NMOCD.

On January 22, 2018, a release was discovered at the Site due to electrical failure on the saltwater pump and call out system causing the produced water tank to overfill and overflow (2RP-4605). According to the Initial C-141 form, the produced water was contained inside the lined containment. Initial response included coordinating with a vacuum truck to remove standing fluids and electricians to fix the electrical issues. The C-141 form indicates approximately 109 bbls were recovered and disposed of at an NMOCD approved facility. Rockcliff coordinated and submitted the initial C-141 form with NMOCD. Rockcliff was to evaluate the Site due to two recent releases. No further documentation of response to this release could be located, and it is unclear if the requested work plan was submitted.

No additional file information concerning these releases could be located. The Donaldson Com A well (API No. 30-015-22404) is planned for plugging and abandonment. Due to the location of the releases within the bermed area, a deferral of assessment and remediation until the well and facilities are abandoned is requested. Once the well and facilities have been abandoned, further investigations and remediation will be completed; a comprehensive work plan to address these three releases (and open remediation case numbers) will be submitted once a schedule for abandonment has been determined. The Release Characterization Plan and approval email from NMOCD are provided as Attachments 1 and 2, respectively.

If you have any questions or comments, please contact Rebecca Andresen at 206.726.4717 or by email at [rebecca.andresen@arcadis.com](mailto:rebecca.andresen@arcadis.com).

Sincerely,

Arcadis U.S., Inc.



Mr. Rob Hamlet  
May 30, 2019

Rebecca Andresen  
Vice President

Copies:  
Jason Michelson, Chevron/ CEMC  
Brett Krehbiel, Arcadis

Enclosures:

**Attachments**

- 1 C & S Consulting, Release Characterization Work Plan Closure Report
- 2 January 25, 2018 NMOCD email correspondence



C&S CONSULTING  
1873 FM 1252 E • P.O. Box 1049  
KILGORE, TX 75662

November 17, 2017

## RELEASE CHARACTERIZATION WORK PLAN

Rockcliff Operating New Mexico, LLC (Rockcliff) SCB Injection Facility

API No.: ~~30-015-26472~~

Remediation Case # ~~2RP-4255~~

Eddy County, New Mexico

30-15-22404  
2RP-4412

C&S Consulting (C&S) was retained by Rockcliff to establish a release characterization work plan with the ability to satisfy requests of New Mexico Oil Conservation District (NMOCD) staff and NMOCD Conditions of Approval (COA) as previously established for the release that occurred at the SCB Injection Facility on September 8, 2017. A map of the SCB Injection facility is attached to this letter. C&S will address what we interpret to be an appropriate path forward through the bulleted process below:

- Establish Current Conditions

According to Rockcliff staff, the release was abated relatively quickly and the fluids on the ground were recovered in a timely fashion from the bermed area. Because of this, it is assumed that relatively little vertical migration of contaminants occurred. C&S proposes the following:

- Complete nine (9) soil borings in and around the SCB Injection Facility release area as documented on the attached site map.

C&S proposes that proposed points, provided on Attachment 1 (Proposed Soil Boring Locations), which include nine (9) sample points around and within the assumed impacted area, be approved for the first phase of the investigation. Each sample point will be advanced via hand auger to three (3) feet below ground surface (bgs). These locations are dependent upon NMOCD approval prior to beginning work. C&S will also take care to follow NMOCD guidance as detailed in the COA and regulatory correspondence with any investigations and reporting.

- Sample Screening and Analytical Methodology

Each core will be visually and mechanically screened. Each core will also have field notes describing the physical properties of each soil core. Sample locations will include grab samples gathered at the surface, 1', 2', 3' & 5' bgs, and analyzed. Sample methodology is subject to change in the field per field screening, which will determine the borehole terminus and bottom sample. Analyses for each core will follow COA guidance at a minimum. Analyses will include chlorides (Method 300), benzene, toluene, ethylbenzene, and total xylenes (by either Method 8260 or 8021), and total petroleum hydrocarbons (by Method 8015 extended range including GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>). C&S will review the data, once received and compare it to the standard target concentrations as



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KILGORE, TX 75662

established by NMOCD. Further investigation and/or remediation as determined through this investigation will be determined by those analyses. The standard target concentration for the listed constituents above for onsite soils will be:

- Benzene – 10 ppm (mg/kg)
  - BTEX – 50 ppm (mg/kg)
  - TPH – 100 ppm (mg/kg)
  - Chlorides – 600 ppm (mg/kg)
- NMOCD Preapproval

With our general workplan, as stated above, to begin as soon as possible, C&S would like to have concurrence of the regulatory staff prior to mobilization to preclude any potential confusion and/or project oversights.

- Media Disposal

All soil cuttings will be returned to the borings after sampling.

If you have any questions or require additional information, please contact me at 903-988-8642 or [DHenderson@cslease.com](mailto:DHenderson@cslease.com).

Sincerely,

A handwritten signature in black ink, appearing to read "D Henderson", with a long horizontal flourish extending to the right.

Dustin Henderson, P. G.  
C&S Consulting

Enclosures

## Attachments







**From:** [Weaver, Crystal, EMNRD](#)  
**To:** [John Turner](#); [Bratcher, Mike, EMNRD](#)  
**Cc:** [Mike Martin](#); [Jamie Robinson](#)  
**Subject:** RE: SCB Injection Facility, Remediation Case #2RP-4412  
**Date:** Thursday, January 25, 2018 10:35:00 AM

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Rockcliff \* SCB Injection Facility (reported under API 30-015-22404) \* 2RP-4412

John,

This remediation work plan is approved with the following notes/conditions:

- Both the API number and the 2RP number utilized in the title box on the first page of the written work plan are for the Onsurez #2 location. Because of the turn around on OCD's end on getting this project reviewed I will not deny this work plan but I will state that if another is sent in like this it will be denied. I will cross out that part and correct it and rescan in the document so that we can use this copy.
- Depth and extent of delineation sampling efforts both vertically and horizontally will be led by laboratory confirmation data until required site specific remediation concentrations for Benzene, total BTEX, TPH (GRO+DRO+MRO; C6 thru C36) and chlorides are met. Based on site analysis and consultation of proximal ground water data, depth to ground water for this location could be as shallow as 12bgs (according OSE well C-1102 DTW data) subject to differences due to many factors such as elevation etc. If at any point during the delineation process or the remediation process ground water is reached this project would need to cease all action and OCD would need to be notified of the matter so that an action plan moving forward can be discussed.
- Based on site specific details a site ranking score of 20 or more is appropriate for this release location therefore RRALs (target clean up levels) are correct as stated in the work plan.
- Since this location involves a private surface owner OCD will state that the private party should be kept informed and if they would like to contact us for any reason related to this project OCD is available to communicate with them.
- Although it is stated in the work plan that quick response was achieved regarding retrieving standing fluids for this release the spill did happen back on 9/8/17 therefore there is a potential for fluid migration as well as running into historical impacts at this location. The resolution for this site will be data driven and a full delineation will need to be completed regardless if historical impact is found to be present or not at this location.

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

If you have any questions or concerns, and for notification, please contact Mike Bratcher and/or myself in the District II Office.

## Crystal Weaver

Environmental Specialist  
OCD – Artesia District II  
811 S. 1<sup>st</sup> Street  
Artesia, NM 88210  
Office: 575-748-1283 ext. 101  
Cell: 575-840-5963  
Fax: 575-748-9720

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**From:** John Turner [mailto:John.Turner@Rockcliffenergy.com]  
**Sent:** Wednesday, November 22, 2017 11:13 AM  
**To:** Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>  
**Cc:** Mike Martin <mike.martin@rockcliffenergy.com>; Jamie Robinson <Jamie.Robinson@Rockcliffenergy.com>  
**Subject:** SCB Injection Facility, Remediation Case #2RP-4412

Please find attached the SCB Injection Facility Release Characterization Work Plan for the release that occurred at the SCB Injection Facility on September 8, 2107. C&S Consulting and myself will be New Mexico November 27 through November 29 completing field work at multiple locations including the SCB Injection Facility.

Thank you and hope you have a Happy Thanksgiving!

### John Turner

#### Rockcliff Energy, LLC

Sr. Environmental Specialist  
342 Johnny Clark Rd  
Longview, TX 75603  
O: (903) 643-3791  
C: (903) 261-4673  
[jturner@rockcliffenergy.com](mailto:jturner@rockcliffenergy.com)



**Hamlet, Robert, EMNRD**

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**From:** Hamlet, Robert, EMNRD  
**Sent:** Monday, June 24, 2019 3:30 PM  
**To:** 'Andresen, Rebecca'  
**Cc:** Venegas, Victoria, EMNRD; Bratcher, Mike, EMNRD; 'Jason Michelson'  
**Subject:** RE: Donaldson Com A Well No. 1, 2RP-4605, 2RP-4412, 2RP-4578

Rebecca,

Looking at these three spills at the Donaldson Com A #1, they all have one thing in common. All three C-141's mentioned that the water was contained within the containment. 2RP-4579 mentions earthen firewall (containment) and 2RP-4605 mentions a lined containment. I'm not sure if there was a liner on this well throughout. If a liner is present, it will need to be removed to sample underneath. We are going to need some samples taken in the berm itself (evenly spaced) to verify the contaminant levels. Please make sure a couple of the samples go deep enough to vertically delineate the chloride contaminants if present. Also, take some samples around the perimeter of the berm to verify that produced water did not leak out of the containment.

If there are contaminants in the berm, the contaminated soil will need to be excavated due to the sensitive nature of this location. Looking at the NM OCD Environmental Map, the depth to groundwater in this area appears to be very shallow (30-40').

If you feel the depth to groundwater is >50', a shallow borehole can be drilled to 55' allowing for verification of the depth. If water is not visible after reaching bottom-hole and waiting 72 hours, sample points would be allowed for deferral.

Since, all three spills supposedly occurred within the containment area and overlap, we will treat this as one spill. And defer or close all three together.

Please, let me know if you decide to drill a borehole or have any questions.

Robert J Hamlet  
State of New Mexico  
Energy, Minerals, and Natural Resources  
Oil Conservation Division  
811 S. First St., Artesia NM 88210  
(575) 840-5963  
[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

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**From:** Andresen, Rebecca <Rebecca.Andresen@arcadis.com>  
**Sent:** Thursday, June 13, 2019 2:49 PM  
**To:** Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>  
**Cc:** Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; 'Jason Michelson' <JMichelson@chevron.com>  
**Subject:** [EXT] Donaldson Com A Well No. 1, 2RP-4605, 2RP-4412, 2RP-4578

Mr. Hamlet,

Please find attached a Site Deferral Letter regarding NMOCD Case No. 2RP-4605, 2RP-4412, and 2RP-4578. NMOCD was notified of releases at this location in November 2017, February 2019, and March 2019. A Release Characterization Work Plan was submitted to the NMOCD in November 2018, but it is uncertain if the work plan was implemented. Chevron acquired the lease for this well in October 2018 and is planning to plug and abandon the well. We are respectfully requesting to defer site investigation and remediation activities until the facility is decommissioned.

Please let us know if you have questions.

Best Regards,

**Rebecca Andresen, P.G.** | Vice President | [rebecca.andresen@arcadis.com](mailto:rebecca.andresen@arcadis.com)  
**Arcadis** | 1100 Olive Way, Suite 800, Seattle, WA | 98101 | USA  
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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

CONDITIONS  
  
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