

REVIEWED

By Mike Buchanan at 8:22 am, Feb 25, 2025

Mr. Bradford Billings
Project Manager
EMNRD/OCD
5200 Oakland, NE, Suite 100
Albuquerque, NM 87113

Subject:

Proposed Groundwater Monitoring and LNAPL O&M Reduction Workplan
Chevron Environmental Management
Former F-State Tank Battery
Lea County, New Mexico
Case No. 1RP-258

Dear Mr. Billings:

At the request of Chevron Environmental Management Company (CEMC), Arcadis U.S., Inc. (Arcadis) is proposing the reduction of groundwater monitoring frequency from the current semi-annual sampling event frequency to quarterly for the liquid (LNAPL) recovery event frequency (Site).

The Former F-State Tank Battery Site is located on the east side of Road 41 (Maddox Road), approximately three miles northeast of the intersection of Road 41 and Road 19, in the northeast quarter (NE/4) of the section 24, Township 19 South, Range 36 East, Lea County, New Mexico. The Site's coordinates are latitude 32.643018 and longitude -103.301158.

Groundwater monitoring began at the Site in July 1998, and the Site is currently monitored semi-annually from a network of 7 monitoring wells, 4 recovery wells, and 2 off-site water wells (two full site groundwater sampling events are currently being conducted). Sentry well MW-6 is additionally sampled quarterly to ensure the dissolved-phase plume is not migrating southwest towards the off-site water wells (WW-1 and WW-2). At the request of the NMOC, LNAPL samples are collected annually from recovery wells containing measurable LNAPL. Two recovery wells (RW-1 and RW-4) currently contain LNAPL and bi-weekly LNAPL gauging and hand-bailing activities are currently conducted. All monitoring wells without LNAPL are currently sampled during both semi-annual (full site) sampling events. The constituents of concern (COCs) in groundwater currently being

Review of the Proposed Groundwater Monitoring and LNAPL O&M Reduction Workplan is satisfactory for approval.

1. Reduce LNAPL Recovery as proposed, from bi-weekly to quarterly in order to establish a more efficient removal method.

2. Based on historical trends, reduce site wells from the semi-annual sampling event: MW3, MW-4, MW-5, MW-7, MW-8, MW-9R, WW-1, and WW-2.

3. Cease sampling for recovery wells, as analytical sampling trends have been established. Continue to sample MW-6 on a quarterly basis as proposed.

4. Submit the annual groundwater monitoring report to OCD by, or before April 1, 2025

Reduction Workplan

Arcadis U.S., Inc.
10205 Westheimer Road
Suite 800
Houston
Texas 77042
Tel 713 953 4800
Fax 713 977 4620
www.arcadis.com

ENVIRONMENT

Date:
July 16, 2020

Contact:
Scott Foord

Phone:
713.953.4853

Email:
William.foord@arcadis.com

ARCADIS U.S., Inc.
TX Engineering License # F-533
Geoscientist License # 50158

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EMNRD/OCD
July 16, 2020

analyzed for include benzene, ethylbenzene, toluene, xylenes (BTEX) and chloride. Neither BTEX or chloride have been detected above New Mexico Water Quality Control Commission (NMWQCC) screening standards or typically above the laboratory method detection limits in site monitoring or water wells for the life of the project. The BTEX plume has remained stable and within the proximity of the four recovery wells only. The Site groundwater flow is generally to the southeast.

For additional site-specific background information please refer to the GHD, 2018 Annual Groundwater Monitoring Report, dated February 2019. The 2019 Annual Groundwater Monitoring Report will be submitted by the end of the third quarter 2020.

PROPOSED REDUCED SAMPLING PLAN

The following Workplan outlines the specifics of the proposed reduced sampling plan and the methodology for the selection of those monitoring wells. One semi-annual monitoring event (full site) will include sampling all site wells as currently conducted. The second semi-annual sampling event will be reduced to only sampling monitoring wells based on the following proposed sampling methodology. Sentry well MW-6 will continue to be sampled quarterly to ensure the dissolved-phase plume is not migrating southwest towards the off-site water wells. The groundwater sampling frequency of all other wells will be assessed yearly based on the results of the sampling events for the lifespan of the project and will increase to quarterly for a minimum of eight consecutive quarters prior to closure request for the Site.

Additionally, CEMC requests the reduction of current LNAPL gauging and hand-bailing activities schedule from bi-weekly to quarterly gauging only (no hand-bailing) for one year (through August 2021), to allow the current LNAPL conditions at the Site to equilibrate so that a more practical/efficient LNAPL recovery method can be evaluated and initiated.

CEMC also request to discontinue the annual collection of LNAPL samples from recovery wells for analytical analyses as data trends for these wells have been established.

The following sections provide specifics for the proposed reduced groundwater monitoring plan:

Sampling Reduction for Non-impacted Monitoring Wells

Site monitoring wells with COC concentrations reported below NMWQCC exceedance standards for two consecutive years or longer will not be gauged or sampled during the second semi-annual monitoring event except for sentry well MW-6.

The Site wells currently selected for reduction from the second semi-annual sampling event include: MW-3, MW-4, MW-5, MW-7, MW-8, MW-9R, WW-1, and WW-2.

The previously referenced wells have been evaluated based on historical concentration trends, historical concentration trends of nearby monitoring wells, potential receptors, and the groundwater gradient.

The proposed list of Site monitoring wells that will be sampled during each semi-annual event are presented on attached **Table 1** (Sampling and Analysis Plan).

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The Site monitoring wells that will be sampled during the reduced event are presented on **Figure 1** (Potentiometric Surface Map), and with current groundwater constituent concentrations on **Figure 2** (Proposed Groundwater Monitoring Reduction Plan).

The Summary of Historical Groundwater Analytical Results is presented in **Table 2**.

Request to Reduce LNAPL Recovery and Gauging

As stated previously, CEMC additionally requests the reduction of the current bi-weekly LNAPL gauging and hand-bailing activities schedule to quarterly gauging only (no hand-bailing) for one year through August 2021 to allow the current LNAPL conditions at the Site to equilibrate so that a more practical/efficient LNAPL recovery method can be evaluated and initiated. CEMC will assess findings from the LNAPL gauging data collected through August 2021 to evaluate more practical and effective LNAPL recovery system alternatives.

CONTACT

Arcadis is prepared to initiate the scope of work immediately. If you have any questions or comments, please contact either Scott Foord by phone at 713 953 4853 or by e-mail at william.foord@arcadis.com or Greg Cutshall by phone at 859 327 4626 or by email at greg.cutshall@arcadis.com.

Sincerely,

Arcadis U.S., Inc.



Scott Foord
Project Manager

Copies:
Greg Cutshall, Program Manager

Enclosures:

Tables

- 1 Sampling and Analysis Plan
- 2 Summary of Historical Groundwater Analytical Results

Figures

- 1 Potentiometric Surface Map
- 2 Proposed Groundwater Monitoring Reduction Plan

TABLES



Table 1
Sampling and Analysis Plan
Chevron Environmental Management Company
Former F-State Tank Battery
Lea County, New Mexico
Case No. 1RP-258



Well ID	1st Quarter Sentry Well MW-6 only		2nd Quarter First Semi-Annual Event		3rd Quarter Sentry Well MW-6 only		4th Quarter Second Semi-Annual Event	
	BTEX	Chloride	BTEX	Chloride	BTEX	Chloride	BTEX	Chloride
MW-3	--	--	X	X	--	--	--	--
MW-4	--	--	X	X	--	--	--	--
MW-5	--	--	X	X	--	--	--	--
MW-6	X	X	X	X	X	X	X	X
MW-7	--	--	X	X	--	--	--	--
MW-8	--	--	X	X	--	--	--	--
MW-9R	--	--	X	X	--	--	--	--
RW-1	--	--	--	--	--	--	--	--
RW-2	--	--	X	X	--	--	X	X
RW-3	--	--	X	X	--	--	X	X
RW-4	--	--	--	--	--	--	--	--
WW-1	--	--	X	X	--	--	--	--
WW-2	--	--	X	X	--	--	--	--

Notes:

USEPA = United States Environmental Protection Agency

X = Sample be collected at monitoring well during respective event.

-- = Sample will not be collected at monitoring well

Bold = LNAPL currently present in well

Table 2
Cumulative Groundwater Analytical Data
Chevron Environmental Management Company
Former New Mexico "F" State Tank Battery
Lea County, New Mexico



Sample ID	Sample Date	Benzene	Toluene	Ethylbenzene	Total Xylenes	Chloride
New Mexico Water Quality Control Commission Groundwater Standard						
		0.005 ¹	1.0 ¹	0.7 ¹	0.62 ¹	250 ²
MW-3	7/28/98	0.003	<0.001	<0.001	0.002	36
MW-3	2/16/01	<0.005	<0.005	<0.005	<0.005	31
MW-3	6/12/02	<0.005	<0.005	<0.005	<0.005	27.1
MW-3	11/26/03	<0.001	<0.001	<0.001	<0.001	31.9
MW-3	6/6/03	<0.001	<0.001	<0.001	<0.001	27.5
MW-3	12/4/03	<0.001	<0.001	<0.001	0.0017	26.1
MW-3	7/2/04	<0.005	<0.005	<0.005	<0.005	28
MW-3	12/21/04	<0.005	<0.005	<0.005	<0.005	32.3
MW-3	6/6/05	<0.00100	<0.00100	<0.00100	<0.00100	34.3
MW-3	12/13/05	<0.005	<0.005	<0.005	<0.010	29.3
MW-3	6/27/06	<0.005	<0.005	<0.005	<0.010	31.1
MW-3	12/19/06	<0.005	<0.005	<0.005	<0.001	28
MW-3	6/27/07	<0.005	<0.005	<0.005	<0.010	31
MW-3	12/14/07	<0.005	<0.005	<0.005	<0.010	31
MW-3	6/5/08	<0.00037	<0.00039	<0.00042	<0.00035	30
MW-3	11/14/08	<0.00037	<0.00039	<0.00042	<0.00035	32
DUP	11/14/08	<0.00037	<0.00039	<0.00042	<0.00035	32
MW-3	6/16/09	<0.00037	<0.00039	<0.00042	<0.00035	35
MW-3	11/20/09	<0.00037	<0.00039	<0.00042	<0.00035	40
MW-3	7/1/10	<0.00020	<0.00020	<0.00020	<0.00070	50.4
MW-3	11/9/10	<0.0001	<0.0001	<0.0001	<0.0003	64
MW-3	6/2/11	0.00053J	0.00061J	<0.0010	<0.0030	90.7
MW-3	12/2/11	<0.0001	<0.0001	<0.0001	<0.0003	85.0
DUP	12/2/11	<0.0001	<0.0001	<0.0001	<0.0003	85.7
MW-3	6/26/12	<0.0001	<0.0001	<0.0001	<0.0001	114
MW-3	11/26/12	<0.0001	<0.0002	0.00116	0.00345	94.6
MW-3	6/14/13	<0.001	<0.002	<0.001	<0.001	79
MW-3	11/27/13	<0.001	<0.002	<0.001	<0.001	101
MW-3	8/1/14	<0.001	<0.002	<0.001	<0.003	75.6
MW-3	12/12/14	<0.001	<0.002	<0.001	<0.003	137
MW-3	6/9/15	<0.001	<0.002	<0.001	<0.003	89.1
MW-3	12/9/15	<0.001	<0.002	<0.001	<0.003	67.8
MW-3	6/21/16	<0.002	<0.002	<0.002	<0.002	57.9
MW-3	12/8/16	<0.002	<0.002	<0.002	<0.002	60.6
MW-3	6/14/17	<0.002	<0.002	<0.002	<0.002	55.0
MW-3	11/29/17	<0.002	<0.002	<0.002	<0.002	49.8
MW-3	6/14/18	<0.002	<0.002	<0.002	<0.002	50.6
MW-3	12/13/18	<0.0020	<0.0020	<0.002	<0.002	50.0
MW-3	5/6/19	<0.0020	<0.0020	<0.0020	<0.0020	53.0
MW-3	11/19/19	<0.0010	<0.0010	<0.0010	<0.0020	59.0

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Chevron Environmental Management Company
Former New Mexico "F" State Tank Battery
Lea County, New Mexico



Sample ID	Sample Date	Benzene	Toluene	Ethylbenzene	Total Xylenes	Chloride
New Mexico Water Quality Control Commission Groundwater Standard						
		0.005 ¹	1.0 ¹	0.7 ¹	0.62 ¹	250 ²
MW-4	7/28/98	<0.001	<0.001	<0.001	<0.001	94
MW-4	2/16/01	<0.005	<0.005	<0.005	0.008	170
MW-4	6/12/02	<0.005	<0.005	<0.005	<0.005	85.6
MW-4	11/26/03	0.002	<0.001	<0.001	<0.005	160
MW-4	6/6/03	<0.001	<0.001	<0.001	0.0026	111
MW-4	12/4/03	0.0015	<0.001	<0.001	<0.001	104
MW-4	7/2/04	<0.001	<0.001	<0.001	<0.001	72.4
MW-4	12/21/04	<0.005	<0.005	<0.005	<0.005	59.7
MW-4	6/6/05	<0.001	<0.001	<0.001	<0.001	58.4
MW-4	12/13/05	<0.005	<0.005	<0.005	<0.010	55.3
MW-4	6/27/06	0.000597	<0.0005	<0.0005	<0.001	48.8
MW-4	12/19/06	<0.005	<0.005	<0.005	<0.001	34
MW-4	6/27/07	<0.005	<0.005	<0.005	<0.010	39
MW-4	12/13/07	0.000968	<0.000500	<0.000500	0.00254	63.1
MW-4	6/5/08	<0.00037	<0.00039	<0.00042	<0.00035	61
MW-4	11/14/08	<0.00037	<0.00039	<0.00042	<0.00035	52
MW-4	6/16/09	<0.00037	<0.00039	<0.00042	<0.00035	59
MW-4	11/20/09	<0.00037	<0.00039	<0.00042	<0.00035	58
MW-4	7/1/10	0.00032J	<0.00020	<0.00020	<0.00070	54.5
MW-4	11/9/10	<0.0001	<0.0001	<0.0001	<0.0003	57.5
DUP	11/9/10	<0.0001	<0.0001	<0.0001	<0.0003	58.4
MW-4	6/2/11	<0.0001	<0.0001	<0.0001	<0.0003	49.8
MW-4	12/2/11	<0.0001	<0.0001	<0.0001	<0.0003	142
MW-4	6/26/12	<0.0001	<0.0001	<0.0001	<0.0001	73.7
MW-4	11/26/12	<0.0001	<0.0001	<0.0001	<0.0001	69.3
MW-4	6/14/13	<0.001	<0.002	<0.001	<0.001	59.5
MW-4	11/27/13	<0.001	<0.002	<0.001	<0.001	65.1
MW-4	8/1/14	<0.001	<0.002	<0.001	<0.003	71.8
MW-4	12/12/14	<0.001	<0.002	<0.001	<0.003	104
MW-4	6/9/15	<0.0001	<0.0001	<0.0001	<0.0003	98.5
MW-4	12/9/15	<0.0001	<0.0001	<0.0001	<0.0003	70.6
MW-4	6/21/16	<0.002	<0.002	<0.002	<0.002	60.9
MW-4	12/8/16	<0.002	<0.002	<0.002	<0.002	86.2
MW-4	6/14/17	<0.002	<0.002	<0.002	<0.002	86.4
MW-4	11/29/17	<0.002	<0.002	<0.002	<0.002	81.7
MW-4	6/14/18	<0.002	<0.002	<0.002	<0.002	96.4
MW-4	12/13/18	<0.002	<0.002	<0.002	<0.002	77.6
MW-4	5/6/19	<0.002	<0.002	<0.002	<0.002	54.6
MW-4	11/19/19	<0.0010	<0.0010	<0.0010	<0.002	99

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Sample ID	Sample Date	Benzene	Toluene	Ethylbenzene	Total Xylenes	Chloride
New Mexico Water Quality Control Commission Groundwater Standard						
		0.005 ¹	1.0 ¹	0.7 ¹	0.62 ¹	250 ²
MW-5	7/28/98	<0.001	<0.001	<0.001	<0.001	360
MW-5	2/16/01	<0.005	<0.005	<0.005	<0.005	120
MW-5	6/12/02	<0.005	<0.005	<0.005	<0.005	90.2
MW-5	11/26/03	0.002	<0.001	0.003	<0.002	59.1
MW-5	6/6/03	<0.001	<0.001	<0.001	<0.001	48.6
MW-5	12/4/03	<0.001	<0.001	<0.001	<0.001	36.5
MW-5	7/2/04	<0.005	<0.005	<0.005	<0.005	32.9
MW-5	12/21/04	<0.005	<0.005	<0.005	<0.005	39.8
MW-5	6/6/05	<0.001	<0.001	<0.001	<0.001	41.1
MW-5	12/13/05	<0.005	<0.005	<0.005	<0.010	39.7
MW-5	6/27/06	<0.0005	<0.0005	<0.0005	<0.001	43.2
MW-5	12/19/06	<0.005	<0.005	<0.005	<0.001	51
MW-5	6/27/07	<0.005	<0.005	<0.005	<0.001	67
MW-5	12/14/07	<0.005	<0.005	<0.005	<0.001	101
MW-5	6/4/08	<0.00037	<0.00039	<0.00042	<0.00035	78.7
MW-5	11/14/08	<0.00037	<0.00039	<0.00042	<0.00035	100
MW-5	6/16/09	<0.00037	<0.00039	<0.00042	<0.00035	140
MW-5	11/20/09	<0.00037	<0.00039	<0.00042	<0.00035	110
MW-5	7/1/10	<0.0002	<0.0002	<0.0002	<0.0007	115
MW-5	11/9/10	<0.0001	<0.0001	<0.0001	<0.0003	168
MW-5	6/2/11	<0.0001	<0.0001	<0.0001	<0.0003	134
MW-5	12/2/11	<0.0001	<0.0001	<0.0001	<0.0003	172
MW-5	6/26/12	<0.0001	<0.0001	<0.0001	<0.0001	137
MW-5	11/26/12	<0.0001	<0.0001	<0.0001	<0.0001	110
MW-5	6/14/13	<0.001	<0.002	<0.001	<0.001	66.6
MW-5	11/27/13	<0.001	<0.002	<0.001	<0.001	72.3
MW-5	8/1/14	<0.001	<0.002	<0.001	<0.003	69.5
MW-5	12/12/14	<0.001	<0.002	<0.001	<0.003	66.9
MW-5	6/9/15	<0.001	<0.002	<0.001	<0.003	69.1
MW-5	12/9/15	<0.001	<0.002	<0.001	<0.003	44
MW-5	6/21/16	<0.002	<0.002	<0.002	<0.002	39.9
MW-5	12/8/16	<0.002	<0.002	<0.002	<0.002	39.1
MW-5	6/14/17	<0.002	<0.002	<0.002	<0.002	42.1
MW-5	11/29/17	<0.002	<0.002	<0.002	<0.002	35.6
MW-5	6/14/18	<0.002	<0.002	<0.002	<0.002	37.6
MW-5	12/13/18	<0.002	<0.002	<0.002	<0.002	37.4
MW-5	5/6/19	<0.002	<0.002	<0.002	<0.002	114.0
MW-5	11/19/19	<0.0010	<0.0010	<0.0010	<0.002	49.0

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Sample ID	Sample Date	Benzene	Toluene	Ethylbenzene	Total Xylenes	Chloride
New Mexico Water Quality Control Commission Groundwater Standard						
		0.005 ¹	1.0 ¹	0.7 ¹	0.62 ¹	250 ²
MW-6	7/28/98	<0.001	<0.001	<0.001	<0.001	43.0
MW-6	2/16/01	<0.005	<0.005	0.006	0.006	52
MW-6	6/12/02	<0.001	<0.001	<0.001	<0.001	54.1
MW-6	11/26/03	<0.001	<0.001	<0.001	<0.002	65
MW-6	6/6/03	<0.001	<0.001	<0.001	<0.001	43.7
MW-6	12/4/03	<0.001	<0.001	<0.001	<0.001	45.3
MW-6	7/2/04	<0.001	<0.001	<0.001	<0.001	57.5
MW-6	12/21/04	<0.005	<0.005	<0.005	<0.005	61.3
MW-6	6/6/05	<0.001	<0.001	<0.001	<0.001	66.7
MW-6	12/13/05	<0.005	<0.005	<0.005	<0.010	80.9
MW-6	6/27/06	<0.0005	<0.0005	<0.0005	<0.001	86.4
MW-6	12/19/06	<0.005	<0.005	<0.005	<0.001	88
MW-6	3/16/07	<0.0005	<0.0005	<0.0005	<0.001	92.2
MW-6	6/27/07	<0.0005	<0.0005	<0.0005	<0.001	110
MW-6	9/27/07	<0.0005	<0.0005	<0.0005	<0.001	99.5
MW-6	12/14/07	<0.0005	<0.0005	<0.0005	<0.001	99.2
MW-6	3/6/08	<0.00037	<0.00039	<0.00042	<0.00035	88.8
MW-6	6/4/08	<0.00037	<0.00039	<0.00042	<0.00035	117
MW-6	9/4/08	<0.00037	<0.00039	<0.00042	<0.00035	130
MW-6	11/14/08	<0.00037	<0.00039	<0.00042	<0.00035	130
MW-6	3/5/09	<0.00037	<0.00039	<0.00042	<0.00035	140
MW-6	6/16/09	<0.00037	<0.00039	<0.00042	<0.00035	160
MW-6	9/9/09	<0.00037	<0.00039	<0.00042	<0.00035	160
MW-6	11/20/09	<0.00037	<0.00039	<0.00042	<0.00035	140
MW-6	3/23/10	<0.0002	<0.0002	<0.0002	<0.0007	169
MW-6	7/1/10	<0.0002	<0.0002	<0.0002	<0.0007	161
DUP	7/1/10	<0.0002	<0.0002	<0.0002	<0.0007	169
MW-6	9/22/10	0.00033J	<0.0001	<0.0001	<0.0003	157
MW-6	11/9/10	<0.0001	<0.0001	0.0010	<0.0003	182
MW-6	3/3/11	<0.0001	<0.0001	<0.0001	<0.0003	225
MW-6	6/2/11	<0.0001	<0.0001	<0.0001	<0.0003	215
DUP	6/2/11	<0.0001	<0.0001	<0.0001	<0.0003	221
MW-6	9/27/11	<0.0001	<0.0001	<0.0001	<0.0003	222
MW-6	12/2/11	<0.0001	<0.0001	<0.0001	<0.0003	198
MW-6	3/7/12	<0.0001	<0.0001	<0.0001	<0.0001	189
MW-6	6/26/12	<0.0001	<0.0001	<0.0001	<0.0001	259
DUP	6/26/12	<0.0001	<0.0001	<0.0001	<0.0001	260
MW-6	9/20/12	<0.0001	<0.0001	<0.0001	<0.0001	221
MW-6	11/26/12	<0.0001	<0.0001	<0.0001	<0.0001	176
MW-6	3/14/13	<0.001	<0.002	<0.001	<0.001	195

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Chevron Environmental Management Company
Former New Mexico "F" State Tank Battery
Lea County, New Mexico



Sample ID	Sample Date	Benzene	Toluene	Ethylbenzene	Total Xylenes	Chloride
New Mexico Water Quality Control Commission Groundwater Standard						
		0.005 ¹	1.0 ¹	0.7 ¹	0.62 ¹	250 ²
MW-6	6/14/13	<0.001	<0.002	<0.001	<0.001	219
MW-6	9/13/13	<0.001	<0.002	<0.001	<0.001	209
MW-6	11/27/13	<0.001	<0.002	<0.001	<0.001	220
MW-6	3/21/14	<0.001	<0.002	<0.001	<0.003	231
MW-6	8/1/14	<0.001	<0.002	<0.001	<0.003	220
MW-6	9/22/14	<0.001	<0.002	<0.001	<0.003	186
MW-6	12/12/14	<0.001	<0.002	<0.001	<0.003	217
MW-6	3/31/15	<0.001	<0.002	<0.001	<0.003	201
MW-6	6/9/15	<0.001	<0.002	<0.001	<0.003	209
MW-6	9/16/15	<0.001	<0.002	<0.001	<0.003	212
MW-6	12/9/15	<0.001	<0.002	<0.001	<0.003	175
MW-6	3/7/16	<0.001	<0.002	<0.001	<0.001	218
MW-6	6/21/16	<0.002	<0.002	<0.002	<0.002	201
MW-6	8/31/16	<0.002	<0.002	<0.002	<0.002	222
MW-6	12/8/16	<0.002	<0.002	<0.002	<0.002	190
MW-6	3/9/17	<0.002	<0.002	<0.002	<0.002	182
MW-6	6/14/17	<0.002	<0.002	<0.002	<0.002	168
MW-6	9/5/17	<0.002	<0.002	<0.002	<0.002	151
MW-6	11/29/17	<0.002	<0.002	<0.002	<0.002	124
MW-6	3/22/18	<0.002	<0.002	<0.002	<0.002	127
MW-6	6/14/18	<0.002	<0.002	<0.002	<0.002	110
MW-6	9/6/18	<0.002	<0.002	<0.002	<0.002	106
MW-6	12/14/18	<0.002	<0.002	<0.002	<0.002	78.7
MW-6	2/7/19	<0.002	<0.002	<0.002	<0.002	100.0
MW-6	5/6/19	<0.002	<0.002	<0.002	<0.002	108.0
MW-6	8/2/19	<0.002	<0.002	<0.002	<0.002	112.0
DUP	8/2/19	<0.002	<0.002	<0.002	<0.002	115.0
MW-6	11/19/19	<0.0010	<0.0010	<0.0010	<0.002	80.0
MW-7	7/28/98	<0.001	<0.001	<0.001	<0.001	82
MW-7	2/16/01	<0.005	<0.005	<0.005	<0.005	150
MW-7	6/12/02	<0.005	<0.005	<0.005	<0.005	96.7
MW-7	11/26/03	<0.001	<0.001	<0.001	<0.002	133
MW-7	6/6/03	<0.001	<0.001	<0.001	<0.001	199
MW-7	12/4/03	<0.001	<0.001	<0.001	<0.001	230
MW-7	7/2/04	<0.001	<0.001	<0.001	<0.001	215
MW-7	12/21/04	<0.005	<0.005	<0.005	<0.005	274
MW-7	6/6/05	<0.001	<0.001	<0.001	<0.001	221
MW-7	12/13/05	<0.005	<0.005	<0.005	<0.010	204
MW-7	6/27/06	<0.0005	<0.0005	<0.0005	<0.001	158
MW-7	12/19/06	<0.005	<0.005	<0.005	<0.001	130
MW-7	6/27/07	<0.0005	<0.0005	<0.0005	<0.001	110
MW-7	12/13/07	<0.0005	<0.0005	<0.0005	<0.001	135
MW-7	6/5/08	<0.00037	<0.00039	<0.00042	<0.00035	72.4

Table 2
Cumulative Groundwater Analytical Data
Chevron Environmental Management Company
Former New Mexico "F" State Tank Battery
Lea County, New Mexico



Sample ID	Sample Date	Benzene	Toluene	Ethylbenzene	Total Xylenes	Chloride
New Mexico Water Quality Control Commission Groundwater Standard						
		0.005 ¹	1.0 ¹	0.7 ¹	0.62 ¹	250 ²
MW-7	11/14/08	<0.00037	<0.00039	<0.00042	<0.00035	66
MW-7	6/16/09	<0.00037	<0.00039	<0.00042	<0.00035	58
MW-7	11/20/09	<0.00037	<0.00039	<0.00042	<0.00035	47
MW-7	7/1/10	<0.0002	<0.0002	<0.0002	<0.0007	51.2
MW-7	11/9/10	<0.0001	<0.0001	<0.0001	<0.0003	67.1
MW-7	6/2/11	<0.0001	<0.0001	<0.0001	<0.0003	69.4
MW-7	12/2/11	<0.0001	<0.0001	<0.0001	<0.0003	76.6
MW-7	6/26/12	<0.0001	<0.0001	<0.0001	<0.0001	91.5
MW-7	11/26/12	<0.0001	<0.0001	<0.0001	<0.0001	67.7
MW-7	6/14/13	<0.001	<0.002	<0.001	<0.001	56.4
MW-7	11/27/13	<0.001	<0.002	<0.001	<0.001	78.1
MW-7	8/1/14	<0.001	<0.002	<0.001	<0.003	68.3
MW-7	12/12/14	<0.001	<0.002	<0.001	<0.003	122
MW-7	6/9/15	<0.001	<0.002	<0.001	<0.003	79.2
MW-7	12/9/15	<0.001	<0.002	<0.001	<0.003	94
MW-7	6/21/16	<0.002	<0.002	<0.002	<0.002	52.3
MW-7	12/8/16	<0.002	<0.002	<0.002	<0.002	69.0
MW-7	6/14/17	<0.002	<0.002	<0.002	<0.002	68.6
MW-7	11/29/17	<0.002	<0.002	<0.002	<0.002	62.6
MW-7	6/14/18	<0.002	<0.002	<0.002	<0.002	58.5
MW-7	12/13/18	<0.002	<0.002	<0.002	<0.002	49.9
MW-7	5/6/19	<0.002	<0.002	<0.002	<0.002	58.7
MW-7	11/19/19	<0.0010	<0.0010	<0.0010	<0.002	50.0
MW-8	7/28/98	<0.001	<0.001	<0.001	<0.001	29
MW-8	2/16/01	<0.005	<0.005	<0.005	<0.005	94
MW-8	6/12/02	<0.005	<0.005	<0.005	<0.005	180
MW-8	11/26/03	<0.001	<0.001	<0.001	<0.002	239
MW-8	6/6/03	<0.001	<0.001	<0.001	<0.001	244
MW-8	12/4/03	<0.001	<0.001	<0.001	<0.001	251
MW-8	7/2/04	<0.005	<0.005	<0.005	<0.005	206
MW-8	12/21/04	<0.005	<0.005	<0.005	<0.005	244
MW-8	6/6/05	<0.0001	<0.0001	<0.0001	<0.0001	227
MW-8	12/13/05	<0.005	<0.005	<0.005	<0.010	144
MW-8	6/27/06	<0.0005	<0.0005	<0.0005	<0.001	92.6
MW-8	12/19/06	<0.005	<0.005	<0.005	<0.001	83.0
MW-8	6/27/07	<0.0005	<0.0005	<0.0005	<0.001	79
MW-8	12/13/07	<0.0005	<0.0005	<0.0005	<0.001	82.9
MW-8	6/4/08	<0.00037	<0.00039	<0.00042	<0.00035	54.9
MW-8	11/14/08	<0.00037	<0.00039	<0.00042	<0.00035	47
MW-8	6/16/09	<0.00037	<0.00039	<0.00042	<0.00035	45

Table 2
Cumulative Groundwater Analytical Data
Chevron Environmental Management Company
Former New Mexico "F" State Tank Battery
Lea County, New Mexico



Sample ID	Sample Date	Benzene	Toluene	Ethylbenzene	Total Xylenes	Chloride
New Mexico Water Quality Control Commission Groundwater Standard						
		0.005 ¹	1.0 ¹	0.7 ¹	0.62 ¹	250 ²
MW-8	11/20/09	<0.00037	<0.00039	<0.00042	<0.00035	36
MW-8	7/1/10	<0.0002	<0.0002	<0.0002	<0.0007	38.4
MW-8	11/9/10	<0.0001	<0.0001	<0.0001	<0.0003	47.6
MW-8	6/2/11	<0.0001	<0.0001	<0.0001	<0.0003	51.8
MW-8	12/2/11	<0.0001	<0.0001	<0.0001	<0.0003	72.7
MW-8	6/26/12	<0.0001	<0.0001	<0.0001	<0.0001	95.7
MW-8	11/26/12	<0.0001	<0.0001	<0.0001	<0.0001	77.6
MW-8	6/14/13	<0.001	<0.002	<0.001	<0.001	83.3
DUP	6/14/13	<0.001	<0.002	<0.001	<0.001	84.3
MW-8	11/27/13	<0.001	<0.002	<0.001	<0.001	72.2
DUP	11/27/13	<0.001	<0.002	<0.001	<0.001	71.3
MW-8	8/1/14	<0.001	<0.002	<0.001	<0.003	63.2
MW-8	12/12/14	<0.001	<0.002	<0.001	<0.003	82.8
MW-8	6/9/15	<0.0001	<0.0001	<0.0001	<0.0003	79.8
DUP	6/9/15	<0.0001	<0.0001	<0.0001	<0.0003	84.6
MW-8	12/9/15	<0.0001	<0.0001	<0.0001	<0.0003	69.9
DUP	12/9/15	<0.0001	<0.0001	<0.0001	<0.0003	68.0
MW-8	6/21/16	<0.002	<0.002	<0.002	<0.002	74.4
DUP	6/21/16	<0.002	<0.002	<0.002	<0.002	68.0
MW-8	12/8/16	<0.002	<0.002	<0.002	<0.002	71.4
DUP	12/8/16	<0.002	<0.002	<0.002	<0.002	72.2
MW-8	6/14/17	<0.002	<0.002	<0.002	<0.002	67.1
DUP	6/14/17	<0.002	<0.002	<0.002	<0.002	63.8
MW-8	11/29/17	<0.002	<0.002	<0.002	<0.002	58.7
MW-8	6/14/18	<0.002	<0.002	<0.002	<0.002	68.0
DUP	6/14/18	<0.002	<0.002	<0.002	<0.002	67.9
MW-8	12/13/18	<0.002	<0.002	<0.002	<0.002	62.6
DUP	12/13/18	<0.002	<0.002	<0.002	<0.002	61.5
MW-8	5/6/19	<0.002	<0.002	<0.002	<0.002	102.0
MW-8	11/19/19	<0.0010	<0.0010	<0.0010	<0.002	65.0
MW-9R	6/9/15	<0.0001	<0.0001	<0.0001	<0.0003	145
MW-9R	12/9/15	<0.0001	<0.0001	<0.0001	<0.0003	119
MW-9R	6/21/16	<0.002	<0.002	<0.002	<0.002	109
MW-9R	12/8/16	<0.002	<0.002	<0.002	<0.002	120
MW-9R	6/14/17	<0.002	<0.002	<0.002	<0.002	115
MW-9R	11/29/17	<0.002	<0.002	<0.002	<0.002	98
MW-9R	6/15/18	<0.002	<0.002	<0.002	<0.002	92.2
MW-9R	12/13/18	<0.002	<0.002	<0.002	<0.002	84.0
MW-9R	5/6/19	<0.002	<0.002	<0.002	<0.002	94.1
MW-9R	11/19/19	<0.0010	<0.0010	<0.0010	<0.002	110.0

Table 2
Cumulative Groundwater Analytical Data
Chevron Environmental Management Company
Former New Mexico "F" State Tank Battery
Lea County, New Mexico



Sample ID	Sample Date	Benzene	Toluene	Ethylbenzene	Total Xylenes	Chloride
New Mexico Water Quality Control Commission Groundwater Standard						
		0.005 ¹	1.0 ¹	0.7 ¹	0.62 ¹	250 ²
WW-1	7/28/98	<0.001	<0.001	<0.001	<0.001	100
WW-1	6/12/02	<0.001	<0.001	<0.001	<0.001	43.6
WW-1	11/26/02	<0.001	<0.001	<0.001	<0.002	80
WW-1	6/6/03	<0.001	<0.001	<0.001	<0.001	73.4
WW-1	12/4/03	<0.001	<0.001	<0.001	<0.001	65.3
WW-1	7/2/04	<0.001	<0.001	<0.001	<0.001	66.5
WW-1	12/21/04	<0.005	<0.005	<0.005	<0.005	74.3
WW-1	6/6/05	<0.0001	<0.0001	<0.0001	<0.0001	63.4
WW-1	12/13/05	<0.005	<0.005	<0.005	<0.010	41.1
WW-1	6/27/06	<0.0005	<0.0005	<0.0005	<0.001	50
WW-1	12/19/06	<0.005	<0.005	<0.005	<0.001	80.0
WW-1	6/27/07	<0.0005	<0.0005	<0.0005	<0.001	52
WW-1	12/14/07	<0.0005	<0.0005	<0.0005	<0.001	59.8
WW-1	6/4/08	<0.00037	<0.00039	<0.00042	<0.00035	64.1
DUP	6/4/08	<0.00037	<0.00039	<0.00042	<0.00035	64.4
WW-1	11/14/08	<0.00037	<0.00039	<0.00042	<0.00035	73
WW-1	6/17/09	<0.00037	<0.00039	<0.00042	<0.00035	60
WW-1	11/20/09	<0.00037	<0.00039	<0.00042	<0.00035	64
WW-1	7/1/10	<0.0002	<0.0002	<0.0002	<0.0007	41
WW-1	11/9/10	<0.0001	<0.0001	<0.0001	<0.0003	77
WW-1	6/2/11	<0.0001	<0.0001	<0.0001	<0.0003	73.6
WW-1	12/2/11	<0.0001	<0.0001	<0.0001	<0.0003	50.2
WW-1	6/26/12	<0.0001	<0.0001	<0.0001	<0.0001	90
WW-1	11/26/12	<0.0001	<0.0001	<0.0001	<0.0001	69.9
WW-1	6/14/13	<0.001	<0.002	<0.001	<0.001	53.7
WW-1	11/27/13	----- not sampled -----				
WW-1	8/1/14	<0.001	<0.002	<0.001	<0.003	56.4
WW-1	12/12/14	<0.001	<0.002	<0.001	<0.003	71.6
WW-1	6/9/15	<0.0001	<0.0001	<0.0001	<0.0003	64.8
WW-1	12/9/15	<0.0001	<0.0001	<0.0001	<0.0003	45
WW-1	6/21/16	<0.002	<0.002	<0.002	<0.002	37.0
WW-1	12/8/16	<0.002	<0.002	<0.002	<0.002	42.1
WW-1	6/14/17	<0.002	<0.002	<0.002	<0.002	34.0
WW-1	11/29/17	<0.002	0.0559	0.225	0.0411	49.4
DUP	11/29/17	<0.002	0.059	0.241	0.0456	49.0
WW-1	12/21/17	<0.002	<0.002	<0.002	<0.002	--
WW-1	6/15/18	<0.002	<0.002	<0.002	<0.002	42.6
WW-1	12/18/18	<0.002	<0.002	<0.002	<0.002	45.3
WW-1	5/6/19	<0.002	<0.002	<0.002	<0.002	60.4
DUP	5/6/19	<0.002	<0.002	<0.002	<0.002	55.5

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Sample ID	Sample Date	Benzene	Toluene	Ethylbenzene	Total Xylenes	Chloride
New Mexico Water Quality Control Commission Groundwater Standard						
		0.005 ¹	1.0 ¹	0.7 ¹	0.62 ¹	250 ²
WW-2	6/12/02	<0.001	<0.001	<0.001	<0.001	53.7
WW-2	11/26/02	<0.001	<0.001	<0.001	<0.002	70.9
WW-2	6/6/03	<0.001	<0.001	<0.001	<0.001	71.1
WW-2	12/4/03	<0.001	<0.001	<0.001	<0.001	52.4
WW-2	7/2/04	<0.001	<0.001	<0.001	<0.001	51.0
WW-2	12/21/04	<0.005	<0.005	<0.005	<0.005	55.6
WW-2	6/6/05	<0.001	<0.001	<0.001	<0.001	55.3
WW-2	12/13/05	<0.005	<0.005	<0.005	<0.010	75.3
WW-2	6/27/06	<0.0005	<0.0005	<0.0005	<0.001	69.7
WW-2	12/19/06	<0.005	<0.005	<0.005	<0.001	57.0
WW-2	6/27/07	<0.0005	<0.0005	<0.0005	<0.001	46
WW-2	12/14/07	<0.0005	<0.0005	<0.0005	<0.001	83.1
WW-2	6/4/08	<0.00037	<0.00039	<0.00042	<0.00035	65.9
WW-2	11/14/08	<0.00037	<0.00039	<0.00042	<0.00035	73
WW-2	6/17/09	<0.00037	<0.00039	<0.00042	<0.00035	60
WW-2	11/20/09	----- not sampled -----				
WW-2	7/1/10	<0.0002	<0.0002	<0.0002	<0.0007	66.3
WW-2	11/9/10	<0.0001	<0.0001	<0.0001	<0.0003	77.2
WW-2	6/2/11	<0.0001	<0.0001	<0.0001	<0.0003	74.9
WW-2	12/2/11	<0.0001	<0.0001	<0.0001	<0.0003	76.5
WW-2	6/26/12	<0.0001	<0.0001	<0.0001	<0.0001	63.1
WW-2	11/26/12	<0.0001	<0.0001	<0.0001	<0.0001	50.3
WW-2	6/14/13	<0.001	<0.002	<0.001	<0.001	81.1
WW-2	11/27/13	----- not sampled -----				
WW-2	8/1/14	<0.001	<0.002	<0.001	<0.003	95.5
WW-2	12/12/14	<0.001	<0.002	<0.001	<0.003	112
WW-2	6/9/15	<0.001	<0.002	<0.001	<0.003	108
WW-2	12/9/15	<0.001	<0.002	<0.001	<0.003	45.8
WW-2	6/21/16	<0.002	<0.002	<0.002	<0.002	28.9
WW-2	12/8/16	<0.002	<0.002	<0.002	<0.002	39.1
WW-2	6/14/17	<0.002	<0.002	<0.002	<0.002	29.8
WW-2	11/29/17	<0.002	<0.002	<0.002	<0.002	39.8
WW-2	6/13/18	----- not sampled -----				
WW-2	12/14/18	<0.002	0.00715	<0.0020	0.0828	45.9
WW-2	2/7/19	<0.002	<0.002	<0.002	<0.002	41.5
WW-2	5/6/19	<0.002	<0.002	<0.002	<0.002	97.5
RW-1	6/5/08	0.0119	<0.0039	<0.0042	<0.0035	36.2
RW-1	6/17/09	0.012	0.0055	0.0018	0.012	49
RW-1	7/1/10	0.022	0.00070J	0.0027	0.017	41.1
RW-1	6/26/12	0.0113	<0.00100	0.00514	0.0350	44.1
RW-1	6/27/13	0.00745	0.00963	0.0101	0.0549	33.8
RW-1	8/1/14	0.0172	0.00226	0.00499	0.0237	36.2

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Sample ID	Sample Date	Benzene	Toluene	Ethylbenzene	Total Xylenes	Chloride
New Mexico Water Quality Control Commission Groundwater Standard						
		0.005 ¹	1.0 ¹	0.7 ¹	0.62 ¹	250 ²
RW-1	6/9/15	0.0109	<0.00200	0.00373	0.0182	43.7
RW-1	12/9/15	----- not sampled -----				
RW-1	6/21/16	----- not sampled -----				
RW-1	12/8/16	0.0137	<0.002	<0.002	0.0089	74.9
RW-1	6/14/17	----- not sampled -----				
RW-1	11/29/17	0.0148	<0.002	0.00372	0.0108	101
RW-1	6/14/18	----- not sampled -----				
RW-1	12/14/18	<0.002	0.00363	<0.002	0.0137	131
RW-2	6/27/07	0.00287	<0.0025	<0.0025	0.0303	60
RW-2	6/5/08	<0.0037	<0.0039	<0.0042	<0.0035	51.1
RW-2	6/17/09	<0.00037	0.0046	<0.00042	0.016	44
RW-2	7/1/10	0.0016	<0.0002	<0.0002	0.0067	30.1
RW-2	6/26/12	<0.00100	<0.001	<0.001	0.00362	43.9
RW-2	6/14/13	0.00178	0.00268	0.00171	0.0262	30
RW-2	8/1/14	0.00103	0.00106	<0.001	0.00788	41
RW-2	12/12/14	0.00154	<0.002	<0.001	0.00348	52.7
RW-2	6/9/15	0.00112	<0.002	<0.001	<0.003	49.5
RW-2	12/9/15	<0.00100	<0.002	0.00102	0.00725	48
RW-2	6/21/16	<0.002	<0.002	<0.002	<0.002	44
RW-2	12/8/16	<0.002	<0.002	<0.002	<0.002	55.8
RW-2	6/14/17	0.00408	0.00219	<0.002	<0.002	62.3
RW-2	11/29/17	<0.002	<0.002	<0.002	<0.002	65.0
RW-2	6/15/18	0.00306	<0.002	<0.002	<0.002	72.4
RW-2	12/14/18	<0.002	<0.002	<0.002	0.00215	73.4
RW-3	6/11/02	<0.005	<0.005	<0.005	<0.005	25.9
RW-3	12/3/04	<0.001	<0.001	<0.001	<0.001	36.6
RW-3	6/27/07	0.00855	<0.0025	0.0122	0.027	130
RW-3	6/5/08	<0.0037	<0.0039	<0.0042	0.0129	90.6
RW-3	6/17/09	0.0052	0.0042	0.011	0.025	74
RW-3	11/20/09	<0.00037	0.001	0.0027	0.0076	60
DUP	11/20/09	<0.00037	0.0013	0.003	0.008	60
RW-3	7/1/10	0.0065	<0.0002	0.0066	0.003	68.3
RW-3	6/26/12	0.00682	<0.001	<0.001	<0.001	55.4
RW-3	6/14/13	0.0092	0.0291	0.0253	0.138	37.3
RW-3	8/1/14	0.00709	<0.002	<0.001	0.132	41.5
RW-3	12/12/14	0.00588	<0.002	<0.001	0.00691	47.7
RW-3	6/9/15	0.00512	<0.002	<0.001	0.00309	40
RW-3	12/9/15	0.00432	<0.002	<0.001	<0.003	39
RW-3	6/21/16	0.00408	<0.002	<0.002	<0.002	36.3
RW-3	12/8/16	0.00574	<0.002	<0.002	0.00265	45.3
RW-3	6/14/17	0.00850	<0.002	<0.002	<0.002	43.4
RW-3	11/29/17	0.00563	<0.002	<0.002	<0.002	49.1
RW-3	6/15/18	<0.002	<0.002	<0.002	<0.002	53.1
RW-3	12/14/18	0.00262	<0.002	<0.002	0.00322	55.4

Table 2- WP Cumulative Summary of Groundwater Analytical Results

Table 2
Cumulative Groundwater Analytical Data
Chevron Environmental Management Company
Former New Mexico "F" State Tank Battery
Lea County, New Mexico



Sample ID	Sample Date	Benzene	Toluene	Ethylbenzene	Total Xylenes	Chloride
New Mexico Water Quality Control Commission Groundwater Standard						
		0.005¹	1.0¹	0.7¹	0.62¹	250²
RW-4	6/26/12	0.00221	<0.001	0.00410	0.0188	65.1
RW-4	6/27/13	0.0245	0.0396	0.0779	0.196	43.1
RW-4	8/1/14	0.0155	0.00107	0.00766	0.0286	34.2
RW-4	6/9/15	0.0127	<0.002	0.00752	0.030	39.5
RW-4	12/9/15	----- not sampled -----				
RW-4	6/21/16	----- not sampled -----				
RW-4	12/8/16	0.0139	<0.002	0.00758	0.03070	45.7
RW-4	6/14/17	----- not sampled -----				
RW-4	11/29/17	0.0268	0.00761	0.03040	0.1310	48.9
RW-4	6/14/18	----- not sampled -----				
RW-4	12/14/18	107	390	47.6	252	<5.0

Notes:

Results shown in mg/L.

Data through June 6, 2005 provided by Larson & Associates, Inc.

Bold indicates detection above method detection limit.

Shaded cells indicate New Mexico Water Quality Control Commission (NMWQCC) exceedance.

¹Human Health Standards for Groundwater.

²Other Standards for Domestic Water Supply.

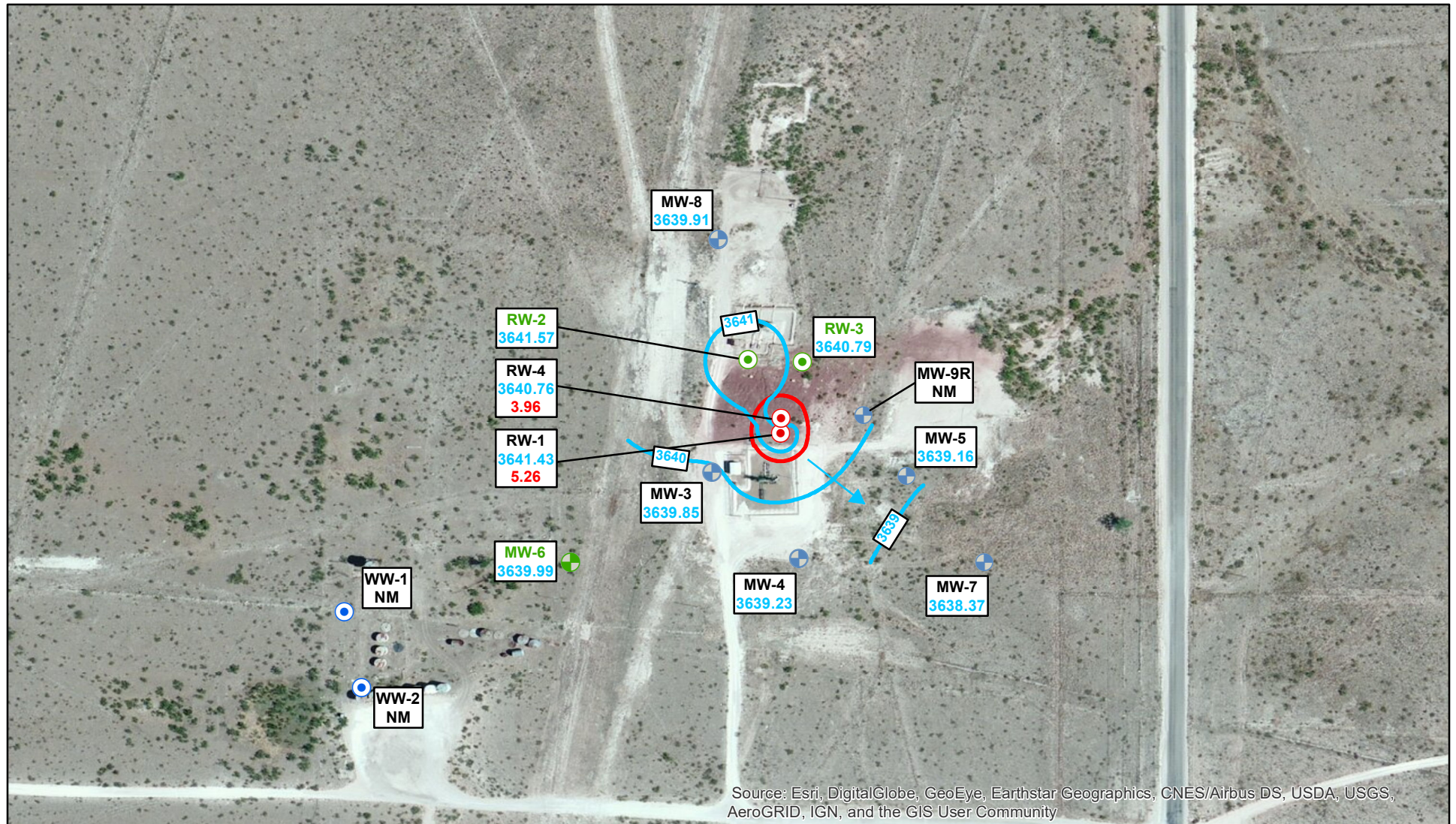
³RW-1 and RW-4 were sampled by dropping a disposable PVC bailer below the level of LNAPL.

⁴MW-9R was installed May 19, 2015.

⁵ Sample was analyzed as a solid instead of a water due to oily nature of sample and results are in mg/kg.

FIGURES



**Legend**

- | | | | |
|--|---|--|---|
| | Monitoring Well Location | | Monitoring Well Location Sampled During Reduced Event |
| | Recovery Well Location | | Recovery Well Location Sampled During Reduced Event |
| | Water Well Location | | |
| | Potentiometric Contour and Elevation | | |
| | Inferred Potentiometric Contour | | |
| | Groundwater Elevation (ft above mean sea level) | | |
| | Approximate Groundwater Flow | | |
| | Approximate LNAPL Contour | | LNAPL Thickness (ft) |

Notes:

1. Datum: D_WGS_1984
2. Site Location: 32.643018, -103.301158
3. NM: Not Measured
4. RW-1 was omitted when developing potentiometric surface for Quarter 1 2019
5. Monitoring wells and recovery wells in green are proposed to be sampled during the reduced sampling event (one semi-annual event)

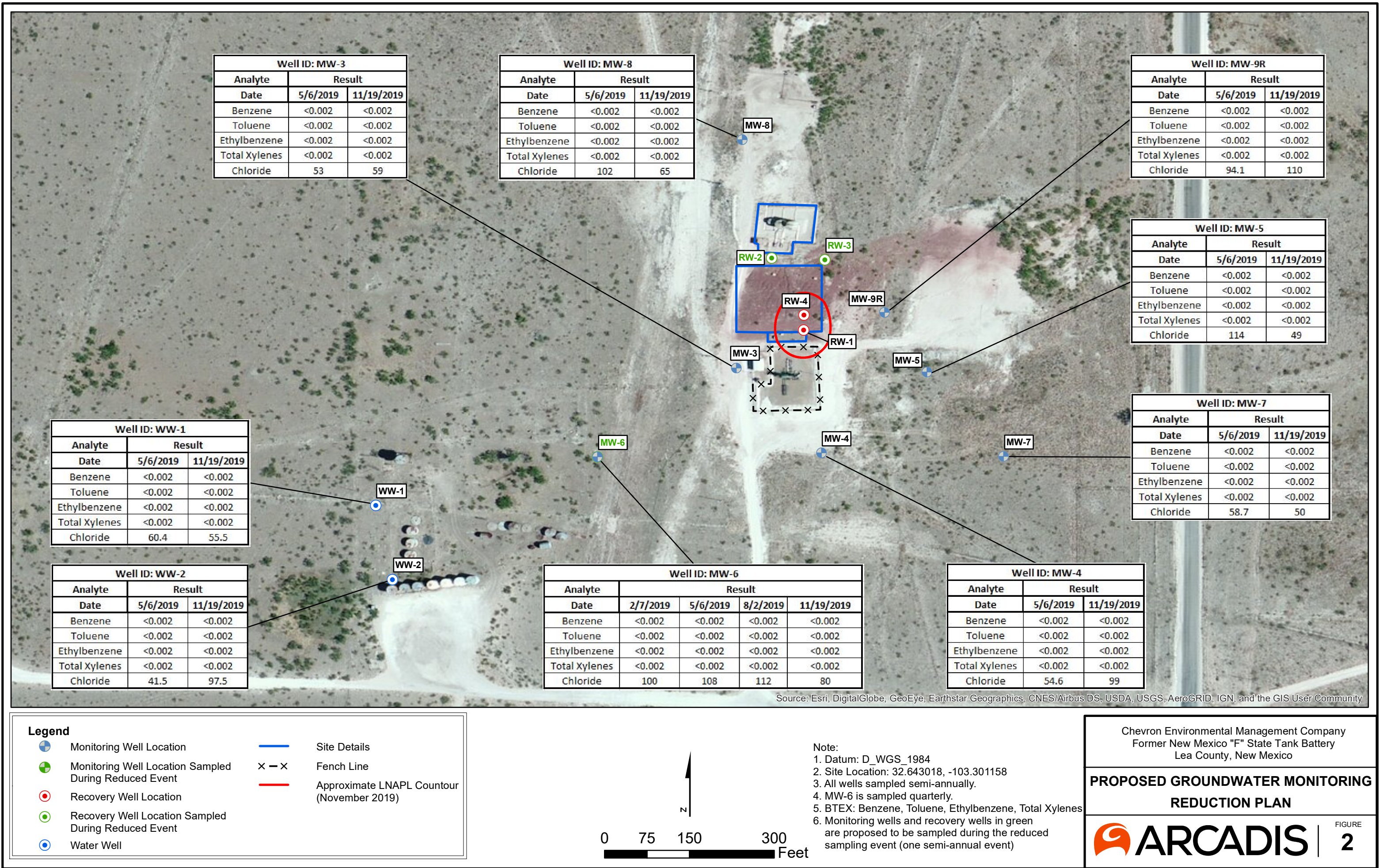
0 125 250 500 Feet

Chevron Environmental Management Company
Former New Mexico "F" State Tank Battery
Lea County, New Mexico

POTENTIOMETRIC SURFACE MAP NOVEMBER 2019

ARCADIS | FIGURE 1

Document Path: \\arcadis-us\office\data\Houston-TX\ENV\Chevron\Texaco TX\HES Transfer\F-State\GIS - F-State



Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/oed/contact-us>

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

CONDITIONS

Action 9407

CONDITIONS

Operator: Arcadis U.S., Inc 630 Plaza Drive Highlands Ranch, CO 80129	OGRID: 329073
	Action Number: 9407
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
michael.buchanan	Review of the Proposed Groundwater Monitoring and LNAPL O&M Reduction Workplan is satisfactory for approval. 1. Reduce LNAPL Recovery as proposed, from bi-weekly to quarterly in order to establish a more efficient removal method. 2. Based on historical trends, reduce site wells from the semi-annual sampling event: MW3, MW-4, MW-5, MW-7, MW-8, MW-9R, WW-1, and WW-2. 3. Cease sampling for recovery wells, as analytical sampling trends have been established. Continue to sample MW-6 on a quarterly basis as proposed. 4. Submit the annual groundwater monitoring report to OCD by, or before April 1, 2025	2/25/2025