

**NM2 - \_\_\_\_\_12\_\_\_\_\_**

**GENERAL  
CORRESPONDENCE  
YEAR(S):**

**\_\_\_\_\_2008\_\_\_\_\_**



# New Mexico Energy, Minerals and Natural Resources Department

**Bill Richardson**

Governor

**Joanna Prukop**  
Cabinet Secretary  
**Reese Fullerton**  
Deputy Cabinet Secretary

**Mark Fesmire**  
Division Director  
Oil Conservation Division



October 20, 2008

Mr. Rodney Bailey  
MidContinent SBU  
Chevron North America Exploration and Production Company  
15 Smith Road  
Midland, Texas 79705

**RE: Cell 17 Sampling Results of Chevron Centralized Landfarm  
Centralized Surface Waste Management Facility Permit NM-2-0012  
W/2 of Section 17, Township 24 South, Range 36 East, NMPM  
Lea County, New Mexico**

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (OCD) has reviewed the sampling results, dated March 31, 2008, submitted by Larson & Associates, Inc. on the behalf of Chevron North America Exploration and Production Company (Chevron) for the Chevron Centralized Landfarm Permit NM-2-012 located in the W/2 of Section 17, Township 24 South, Range 36 East, NMPM of Lea County, New Mexico. The March 31, 2008 submittal requested the approval of the closure of Cell 17. The submittal did not include the appropriate analytical results for OCD to consider approval. In order for OCD to approval of closure, the operator must demonstrate compliance with the closure performance standards specified in Subsection F of 19.15.36.16 NMAC. Until the appropriate test methods, as specified in the Part 17, have been performed and demonstrated and all of the analytical results are provided, OCD will not be able to consider such request for closure.

As stated in OCD's February 19, 2008 letter "cells that require additional tilling and remediation, treatment and vadose zone monitoring are required pursuant to the conditions of Permit NM-2-12 and the transitional provisions of 19.15.36 NMAC." Chevron shall continue quarterly vadose zone monitoring and reporting until the contaminated soils are remediated. After Chevron adequately demonstrates to the OCD that all of the remaining cells have achieved the remediation standards, OCD will require Chevron to submit a closure plan for review and approval.

If you have any questions, regarding this matter, please do not hesitate to contact me at (505) 476-3487 or [brad.a.jones@state.nm.us](mailto:brad.a.jones@state.nm.us).

Sincerely,



Brad A. Jones  
Environmental Engineer

BAJ/baj

cc: OCD District I Office, Hobbs  
Michelle Green, Larsen & Associates, Inc., Midland, Texas 79710



RECEIVED

2008 APR 3 PM 2 04

March 31, 2008

**VIA CERTIFIED MAIL**

Mr. Brad A. Jones  
Environmental Engineer  
State of New Mexico – Department of Natural Resources  
Oil Conservation Division – Environmental Bureau  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

**Re: Cell 17 Laboratory Analysis of Soil Sample  
Chevron North America Exploration and Production Company  
Centralized Surface Waste Management Facility (Permit Number NM-2-0012)  
W/2 of Section 17, Township 24 South, Range 36 East, NMPM  
Lea County, New Mexico**

Dear Mr. Jones:

Larson and Associates, Inc. (LAI), as consultant to Chevron North America Exploration and Production Company (Chevron), submits re-sampling results for Cell 17 to the New Mexico Oil Conservation Division (OCD) for the above referenced centralized surface waste management facility (NM-2-0012).

On March 13, 2008, LAI personnel collected a random 5-part composite soil sample from Cell 17 using a stainless steel hand auger. The samples were collected between 0-1 feet of the tilled zone, placed in pre-cleaned 4-ounce jars, properly labeled and placed on ice upon collection. The samples were submitted to DHL Analytical (DHL) located in Round Rock, Texas.

The composite sample was analyzed for the following constituents:

- Volatile Organics by GC by EPA method SW8021B and
- TRPH by EPA method 418.1.

The results of the composite tilled sample for Cells 17 were 216 milligram/Kilogram (mg/Kg or ppm) for TRPH method 418.1, less than the method detection limit for BTEX (<0.01692 ppm) and less than the method detection limit for Benzene (<0.00282 ppm). These concentrations are also below the limits specified in Condition 8 of the Landfarm Operations provisions of the modification to permit NM-2-012 approved by the OCD on March 26, 2003. The results for Cell 17 collected on May 5 and September 11, 2007 were also below the remediation standard for TRPH, BTEX and Benzene.

Summary of analyses for Cell 17 are presented in Tables 1 and 2.

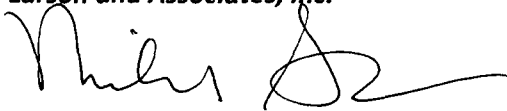
Mr. Brad Jones  
March 31, 2008  
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**Recommendation**

Chevron requests the OCD to grant closure for Cell 17.

If you have any questions or require additional information please contact Mr. Rodney Bailey with Chevron at (432) 894-3519 or via email [bailerg@chevron.com](mailto:bailerg@chevron.com). I can be reached at (432) 687-0901 or via email [michelle@laenvironmental.com](mailto:michelle@laenvironmental.com).

Sincerely,  
***Larson and Associates, Inc.***

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

Michelle L. Green  
Environmental Scientist

Encl.

cc: Rodney Bailey, Chevron  
Larry Johnson, OCD District 1

Table 1

**Summary of BTEX Analyses of Tilled Soil for Cell 17**  
**Chevron North America Exploration and Production Company, Landfarm (Permit NM-2-0012)**  
**W/2 of Section 17, Township 24 South, Range 36 East**

Lea County, New Mexico

Sample	Date	Sample Depth (Feet)	Benzene	Ethylbenzene	Toluene	Total Xylenes	Total BTEX
<b>Action Level (mg/Kg):</b>			<b>10</b>				<b>50</b>
Cell 17 (0-1')	05/21/07	0 - 1	<0.00304	<0.00506	<0.00506	<0.00506	<0.01822
	09/11/07	0 - 1	<0.00106	<0.00106	<0.00106	<0.00106	<0.00424
	03/13/08	0 - 1	<0.00282	<0.00470	<0.00470	<0.00470	<0.01692

**Notes:**

Samples were analyzed by DHL Analytical, Inc., Round Rock, TX

BTEX analysis was performed by SW846 method 8021B

Results are reported in milligram per Kilograms (mg/Kg).

1. <

Less than method detection limit

Table 2

Summary of TPH Analysis of Tilled Soil for Cell 17  
Chevron North America Exploration and Production Company, Landfarm (Permit NIM-2-0012)  
W/2 of Section 17, Township 24 South, Range 36 East  
Lea County, New Mexico

Sample	Date	Depth	TRPH	TPH - GRO C6-C10	TPH - DRO C10-C28	Total TPH
Action Level (mg/Kg):			500			500
Cell 17 (0-1')	05/21/07	0 - 1	108	<0.0635	27.7	27.7
	09/11/07	0 - 1	--	233	<0.0645	233
	03/13/08	0 - 1	216	--	--	--

## Notes:

Samples were analyzed by DHL Analytical, Inc., Round Rock, TX

Results are reported in milligram per Kilograms (mg/Kg).

TRPH analysis was performed by EPA method 418.1

DRO & GRO analysis was performed by EPA method SW8015.

1. <: Less than method detection limit



March 28, 2008

Michelle Green  
Larson & Associates  
507 N. Marienfeld #202  
Midland, TX 79701

Order No: 0803137

TEL: (432) 687-0901  
FAX: (432) 687-0456

RE: Chevron Landfarm

Dear Michelle Green:

DHL Analytical received 1 sample(s) on 3/14/2008 for the analyses presented in the following report.

There were no problems with the analyses and all data met requirements of NELAC except where noted in the Case Narrative. All non-NELAC methods will be identified accordingly in the case narrative and all estimated uncertainties of test results are within method or EPA specifications.

If you have any questions regarding these tests results, please feel free to call. Thank you for using DHL Analytical.

Sincerely,

A handwritten signature in black ink, appearing to read "John DuPont". The signature is fluid and cursive, written over a few lines.

John DuPont  
Lab Manager

This report was performed under the accreditation of the State of Texas Laboratory Certification Number: T104704211-06-TX



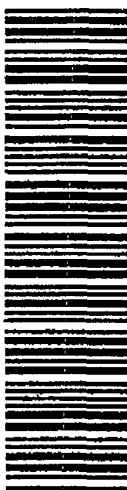
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[illegible]

Lone Star Overnight  
800.800.8984  
www.lso.com



Airbill No. Z4102390



**To: SAMPLE RECEIVING**  
DHL ANALYTICAL  
2300 DOUBLE CREEK DRIVE  
ROUND ROCK, TX 78664  
(512) 388 - 8222

**From: MICHELLE GREEN**  
LARSON & ASSOCIATES, INC.,  
507 N MARIENFELD  
SUITE 202  
MIDLAND, TX 79701  
(432) 687 - 0901

Service Type: By 10:30am  
1D00V

**AUS**

**By 10:30am**

QuickCode: DHL  
Date Printed: 3/13/2008

4



# DHL Analytical

## Sample Receipt Checklist

Client Name **Larson & Associates**

Date Received: **3/14/2008**

Work Order Number **0803137**

Received by **JB**

Checklist completed by: *[Signature]* 3/14/08  
Signature Date

Reviewed by: *[Signature]* 3/14/08  
Initials Date

Carrier name: LoneStar

Shipping container/cooler in good condition?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Not Present <input type="checkbox"/>
Custody seals intact on shipping container/cooler?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Not Present <input type="checkbox"/>
Custody seals intact on sample bottles?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Not Present <input checked="" type="checkbox"/>
Chain of custody present?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Chain of custody signed when relinquished and received?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Chain of custody agrees with sample labels?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Samples in proper container/bottle?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Sample containers intact?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Sufficient sample volume for indicated test?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
All samples received within holding time?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Container/Temp Blank temperature in compliance?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Water - VOA vials have zero headspace?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No VOA vials submitted <input checked="" type="checkbox"/>
Water - pH acceptable upon receipt?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Not Applicable <input checked="" type="checkbox"/>

Adjusted? \_\_\_\_\_ Checked by \_\_\_\_\_

Any No response must be detailed in the comments section below.

Client contacted \_\_\_\_\_ Date contacted: \_\_\_\_\_ Person contacted \_\_\_\_\_

Contacted by: \_\_\_\_\_ Regarding: \_\_\_\_\_

Comments: \_\_\_\_\_

Corrective Action \_\_\_\_\_

---

CLIENT: Larson & Associates  
Project: Chevron Landfarm  
Lab Order: 0803137

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**CASE NARRATIVE**

Samples were analyzed using the methods outlined in the following references:

Method SW8021B - Volatile Organics Analysis  
Method SW9056 - Anions Analysis  
Method D2216 - Percent Moisture (Parameter Not NELAC Certified)  
Method E418.1 - TRPH Analysis (Parameter Not NELAC Certified)

**LOG IN**

The sample was received and log-in performed on 3/14/08. A total of 1 sample was received. The sample arrived in good condition and was properly packaged.

**TRPH**

For TRPH analysis, the recoveries of the matrix spike and matrix spike duplicate (0803222-01 MS and MSD) were above control limits. These are flagged accordingly. The reference sample selected for the MS and MSD was not from this work order. The LCS was within control limits. No further corrective actions were taken.

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CLIENT: Larson & Associates  
Project: Chevron Landfarm  
Lab Order: 0803137

---

**Work Order Sample Summary**

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Lab Smp ID	Client Sample ID	Tag Number	Date Collected	Date Recv'd
0803137-01	Cell 17(0-1')		03/13/08 08:50 AM	03/14/08

---

CLIENT: Larson & Associates  
Project: Chevron Landfarm  
Lab Order: 0803137

## PREP DATES REPORT

Sample ID	Client Sample ID	Collection Date	Matrix	Test Number	Test Name	Prep Date	Batch ID
0803137-01A	Cell 17(0-1')	03/13/08 08:50 AM	Soil	SW5030B	Purge and Trap Soils GC	03/19/08 02:59 PM	29536
0803137-01B	Cell 17(0-1')	03/13/08 08:50 AM	Soil	SW3550B	Soil Prep Sonication: TRPH	03/25/08 09:48 AM	29611
	Cell 17(0-1')	03/13/08 08:50 AM	Soil	SW9056	Anion Prep	03/20/08 02:01 PM	29554
	Cell 17(0-1')	03/13/08 08:50 AM	Soil	D2216	Percent Moisture	03/19/08 10:35 AM	PMOIST_080319B

CLIENT: Larson & Associates  
Project: Chevron Landfarm  
Lab Order: 0803137

## ANALYTICAL DATES REPORT

Sample ID	Client Sample ID	Matrix	Test Number	Test Name	Batch ID	Dilution	Analysis Date	Run ID
0803137-01A	Cell 17(0-1')	Soil	SW8021B	Volatile Organics by GC	29536	1	03/19/08 10:50 PM	GC4_080319A
0803137-01B	Cell 17(0-1')	Soil	SW9056	Anions by IC method - Soil	29554	1	03/24/08 09:35 AM	IC2_080324A
	Cell 17(0-1')	Soil	D2216	Percent Moisture	PMOIST_080319B	1	03/19/08 04:57 PM	PMOIST_080319B
	Cell 17(0-1')	Soil	E418.1	TRPH	29611	1	03/25/08 10:30 AM	IR207_080325A

## DHL Analytical

Date: 03/28/08

CLIENT: Larson & Associates  
 Project: Chevron Landfarm  
 Project No: 6-0137  
 Lab Order: 0803137

Client Sample ID: Cell 17(0-1')  
 Lab ID: 0803137-01  
 Collection Date: 03/13/08 08:50 AM  
 Matrix: Soil

Analyses	Result	MDL	RL	Qual	Units	DF	Date Analyzed
<b>Volatile Organics by GC</b>		<b>SW8021B</b>					<b>Analyst: JAW</b>
Benzene	ND	0.00282	0.00470		mg/Kg-dry	1	03/19/08 10:50 PM
Ethylbenzene	ND	0.00470	0.0141		mg/Kg-dry	1	03/19/08 10:50 PM
Toluene	ND	0.00470	0.0141		mg/Kg-dry	1	03/19/08 10:50 PM
Xylenes, Total	ND	0.00470	0.0141		mg/Kg-dry	1	03/19/08 10:50 PM
Surr: Tetrachloroethene	95.6	0	79 - 135		%REC	1	03/19/08 10:50 PM
<b>TRPH</b>		<b>E418.1</b>					<b>Analyst: DEW</b>
Petroleum Hydrocarbons, TR	216	5.24	10.5	N	mg/Kg-dry	1	03/25/08 10:30 AM
<b>Anions by IC method - Soil</b>		<b>SW9056</b>					<b>Analyst: JBC</b>
Chloride	42.4	5.16	5.16		mg/Kg-dry	1	03/24/08 09:35 AM
<b>Percent Moisture</b>		<b>D2216</b>					<b>Analyst: MW</b>
Percent Moisture	5.02	0	0	N	WT%	1	03/19/08 04:57 PM

<b>Qualifiers:</b>	*	Value exceeds TCLP Maximum Concentration Level	J	Analyte detected between MDL and RL
	B	Analyte detected in the associated Method Blank	MDL	Method Detection Limit
	C	Sample Result or QC discussed in the Case Narrative	N	Parameter not NELAC certified
	DF	Dilution Factor	ND	Not Detected at the Method Detection Limit
	E	TPH pattern not Gas or Diesel Range Pattern	RL	Reporting Limit
			S	Spike Recovery outside control limits



CLIENT: Larson & Associates  
 Work Order: 0803137  
 Project: Chevron Landfarm

## ANALYTICAL QC SUMMARY REPORT

RunID: GC4\_080319A

Sample ID:	LCS-29536	Batch ID:	29536	TestNo:	SW8021B	Units:	mg/Kg			
SampType:	LCS	Run ID:	GC4_080319A	Analysis Date:	03/19/08 03:59 PM	Prep Date:	03/19/08			
Analyte	Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual
Benzene	0.0973	0.00500	0.1000	0	97.3	65	113			
Toluene	0.0988	0.0150	0.1000	0	98.8	73	115			
Ethylbenzene	0.102	0.0150	0.1000	0	102	74	118			
Xylenes, Total	0.318	0.0150	0.3000	0	106	73	119			
Surr: Tetrachloroethene	0.176		0.2000		88.2	79	135			

Sample ID:	MB-29536	Batch ID:	29536	TestNo:	SW8021B	Units:	mg/Kg			
SampType:	MBLK	Run ID:	GC4_080319A	Analysis Date:	03/19/08 04:23 PM	Prep Date:	03/19/08			
Analyte	Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual
Benzene	ND	0.00500								
Toluene	ND	0.0150								
Ethylbenzene	ND	0.0150								
Xylenes, Total	ND	0.0150								
Surr: Tetrachloroethene	0.190		0.2000		95.0	79	135			

Sample ID:	0803138-02AMS	Batch ID:	29536	TestNo:	SW8021B	Units:	mg/Kg-dry			
SampType:	MS	Run ID:	GC4_080319A	Analysis Date:	03/19/08 11:37 PM	Prep Date:	03/19/08			
Analyte	Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual
Benzene	0.0914	0.00496	0.09918	0	92.1	65	113			
Toluene	0.0876	0.0149	0.09918	0	88.3	73	115			
Ethylbenzene	0.0860	0.0149	0.09918	0	86.7	74	118			
Xylenes, Total	0.264	0.0149	0.2976	0	88.8	73	119			
Surr: Tetrachloroethene	0.198		0.1984		100	79	135			

Sample ID:	0803138-02AMSD	Batch ID:	29536	TestNo:	SW8021B	Units:	mg/Kg-dry			
SampType:	MSD	Run ID:	GC4_080319A	Analysis Date:	03/20/08 12:01 AM	Prep Date:	03/19/08			
Analyte	Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual
Benzene	0.0839	0.00444	0.08874	0	94.5	65	113	8.55	30	
Toluene	0.0780	0.0133	0.08874	0	87.8	73	115	11.7	30	
Ethylbenzene	0.0761	0.0133	0.08874	0	85.7	74	118	12.3	30	
Xylenes, Total	0.236	0.0133	0.2662	0	88.5	73	119	11.5	30	
Surr: Tetrachloroethene	0.175		0.1775		98.4	79	135	0	0	

Qualifiers:	B	Analyte detected in the associated Method Blank	R	RPD outside accepted control limits
	DF	Dilution Factor	RL	Reporting Limit
	J	Analyte detected between MDL and RL	S	Spike Recovery outside control limits
	MDL	Method Detection Limit	N	Parameter not NELAC certified
	ND	Not Detected at the Method Detection Limit		

CLIENT: Larson & Associates  
 Work Order: 0803137  
 Project: Chevron Landfarm

## ANALYTICAL QC SUMMARY REPORT

RunID: GC4\_080319A

Sample ID:	ICV-080319	Batch ID:	R36727	TestNo:	SW8021B	Units:	mg/Kg			
SampType:	ICV	Run ID:	GC4_080319A	Analysis Date:	03/19/08 03:35 PM	Prep Date:				
Analyte	Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual
Benzene	0.194	0.00500	0.2000	0	97.0	85	115			
Toluene	0.196	0.0150	0.2000	0	98.2	85	115			
Ethylbenzene	0.202	0.0150	0.2000	0	101	85	115			
Xylenes, Total	0.613	0.0150	0.6000	0	102	85	115			
Surr: Tetrachloroethene	0.190		0.2000		95.0	79	135			

Sample ID:	CCV1-080319	Batch ID:	R36727	TestNo:	SW8021B	Units:	mg/Kg			
SampType:	CCV	Run ID:	GC4_080319A	Analysis Date:	03/19/08 08:29 PM	Prep Date:				
Analyte	Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual
Benzene	0.103	0.00500	0.1000	0	103	85	115			
Toluene	0.104	0.0150	0.1000	0	104	85	115			
Ethylbenzene	0.107	0.0150	0.1000	0	107	85	115			
Xylenes, Total	0.329	0.0150	0.3000	0	110	85	115			
Surr: Tetrachloroethene	0.197		0.2000		98.4	79	135			

Sample ID:	CCV2-080319	Batch ID:	R36727	TestNo:	SW8021B	Units:	mg/Kg			
SampType:	CCV	Run ID:	GC4_080319A	Analysis Date:	03/20/08 01:11 AM	Prep Date:				
Analyte	Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual
Benzene	0.0990	0.00500	0.1000	0	99.0	85	115			
Toluene	0.0996	0.0150	0.1000	0	99.6	85	115			
Ethylbenzene	0.102	0.0150	0.1000	0	102	85	115			
Xylenes, Total	0.312	0.0150	0.3000	0	104	85	115			
Surr: Tetrachloroethene	0.189		0.2000		94.7	79	135			

Sample ID:	ICV-080320	Batch ID:	R36727	TestNo:	SW8021B	Units:	mg/Kg			
SampType:	ICV	Run ID:	GC4_080319A	Analysis Date:	03/20/08 10:02 AM	Prep Date:				
Analyte	Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual
Benzene	0.201	0.00500	0.2000	0	101	85	115			
Toluene	0.204	0.0150	0.2000	0	102	85	115			
Ethylbenzene	0.210	0.0150	0.2000	0	105	85	115			
Xylenes, Total	0.638	0.0150	0.6000	0	106	85	115			
Surr: Tetrachloroethene	0.193		0.2000		96.5	79	135			

Sample ID:	CCV1-080320	Batch ID:	R36727	TestNo:	SW8021B	Units:	mg/Kg			
SampType:	CCV	Run ID:	GC4_080319A	Analysis Date:	03/20/08 11:59 AM	Prep Date:				
Analyte	Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual
Benzene	0.101	0.00500	0.1000	0	101	85	115			
Toluene	0.104	0.0150	0.1000	0	104	85	115			
Ethylbenzene	0.108	0.0150	0.1000	0	108	85	115			
Xylenes, Total	0.331	0.0150	0.3000	0	110	85	115			
Surr: Tetrachloroethene	0.196		0.2000		98.0	79	135			

Qualifiers:	B	Analyte detected in the associated Method Blank	R	RPD outside accepted control limits
	DF	Dilution Factor	RL	Reporting Limit
	J	Analyte detected between MDL and RL	S	Spike Recovery outside control limits
	MDL	Method Detection Limit	N	Parameter not NELAC certified
	ND	Not Detected at the Method Detection Limit		

CLIENT: Larson & Associates  
 Work Order: 0803137  
 Project: Chevron Landfarm

## ANALYTICAL QC SUMMARY REPORT

RunID: IC2\_080324A

Sample ID:	MB-29554	Batch ID:	29554	TestNo:	SW9056	Units:	mg/Kg												
SampType:	MBLK	Run ID:	IC2_080324A	Analysis Date:	03/24/08 08:37 AM	Prep Date:	03/20/08												
Analyte		Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual								
Chloride		ND	5.00																
Sample ID:	LCS-29554	Batch ID:	29554	TestNo:	SW9056	Units:	mg/Kg												
SampType:	LCS	Run ID:	IC2_080324A	Analysis Date:	03/24/08 08:51 AM	Prep Date:	03/20/08												
Analyte		Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual								
Chloride		49.7	5.00	50.00	0	99.5	80	120											
Sample ID:	LCSD-29554	Batch ID:	29554	TestNo:	SW9056	Units:	mg/Kg												
SampType:	LCSD	Run ID:	IC2_080324A	Analysis Date:	03/24/08 09:06 AM	Prep Date:	03/20/08												
Analyte		Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual								
Chloride		50.1	5.00	50.00	0	100	80	120	0.732	20									
Sample ID:	0803142-04B DUP	Batch ID:	29554	TestNo:	SW9056	Units:	mg/Kg-dry												
SampType:	DUP	Run ID:	IC2_080324A	Analysis Date:	03/24/08 01:34 PM	Prep Date:	03/20/08												
Analyte		Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual								
Chloride		14.2	5.20	0	12.86				10.1	25									
Sample ID:	0803142-04B MS	Batch ID:	29554	TestNo:	SW9056	Units:	mg/Kg-dry												
SampType:	MS	Run ID:	IC2_080324A	Analysis Date:	03/24/08 02:04 PM	Prep Date:	03/20/08												
Analyte		Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual								
Chloride		59.1	5.24	52.44	7.718	98.0	80	120											
Sample ID:	0803142-04B MSD	Batch ID:	29554	TestNo:	SW9056	Units:	mg/Kg-dry												
SampType:	MSD	Run ID:	IC2_080324A	Analysis Date:	03/24/08 02:18 PM	Prep Date:	03/20/08												
Analyte		Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual								
Chloride		59.2	5.24	52.44	7.718	98.2	80	120	0.121	20									

Qualifiers:	B	Analyte detected in the associated Method Blank	R	RPD outside accepted control limits
	DF	Dilution Factor	RL	Reporting Limit
	J	Analyte detected between MDL and RL	S	Spike Recovery outside control limits
	MDL	Method Detection Limit	N	Parameter not NELAC certified
	ND	Not Detected at the Method Detection Limit		

CLIENT: Larson & Associates  
 Work Order: 0803137  
 Project: Chevron Landfarm

## ANALYTICAL QC SUMMARY REPORT

RunID: IC2\_080324A

Sample ID:	ICV-080324	Batch ID:	R36782	TestNo:	SW9056	Units:	mg/Kg			
SampType:	ICV	Run ID:	IC2_080324A	Analysis Date:	03/24/08 08:20 AM	Prep Date:	03/24/08			
Analyte	Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual
Chloride	25.4	5.00	25.00	0	102	90	110			

Sample ID:	CCV1-080324	Batch ID:	R36782	TestNo:	SW9056	Units:	mg/Kg			
SampType:	CCV	Run ID:	IC2_080324A	Analysis Date:	03/24/08 10:49 AM	Prep Date:	03/20/08			
Analyte	Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual
Chloride	10.1	1.00	10.00	0	101	90	110			

Sample ID:	CCV2-080324	Batch ID:	R36782	TestNo:	SW9056	Units:	mg/Kg			
SampType:	CCV	Run ID:	IC2_080324A	Analysis Date:	03/24/08 01:49 PM	Prep Date:	03/24/08			
Analyte	Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual
Chloride	10.1	5.00	10.00	0	101	90	110			

Sample ID:	CCV3-080324	Batch ID:	R36782	TestNo:	SW9056	Units:	mg/Kg			
SampType:	CCV	Run ID:	IC2_080324A	Analysis Date:	03/24/08 04:30 PM	Prep Date:	03/24/08			
Analyte	Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual
Chloride	10.1	5.00	10.00	0	101	90	110			

Qualifiers:	B	Analyte detected in the associated Method Blank	R	RPD outside accepted control limits
	DF	Dilution Factor	RL	Reporting Limit
	J	Analyte detected between MDL and RL	S	Spike Recovery outside control limits
	MDL	Method Detection Limit	N	Parameter not NELAC certified
	ND	Not Detected at the Method Detection Limit		

CLIENT: Larson & Associates  
 Work Order: 0803137  
 Project: Chevron Landfarm

## ANALYTICAL QC SUMMARY REPORT

RunID: IR207\_080325A

Sample ID: LCS-29611	Batch ID: 29611	TestNo: E418.1	Units: mg/Kg
SampType: LCS	Run ID: IR207_080325A	Analysis Date: 03/25/08 10:30 AM	Prep Date: 03/25/08
Analyte	Result	RL	SPK value
Petroleum Hydrocarbons, TR	101	10.0	100.0
		Ref Val	%REC
		0	101
		LowLimit	HighLimit
		80	120
		%RPD	RPD Limit
			Qual
			N

Sample ID: MB-29611	Batch ID: 29611	TestNo: E418.1	Units: mg/Kg
SampType: MBLK	Run ID: IR207_080325A	Analysis Date: 03/25/08 10:30 AM	Prep Date: 03/25/08
Analyte	Result	RL	SPK value
Petroleum Hydrocarbons, TR	ND	10.0	
		Ref Val	%REC
		LowLimit	HighLimit
		%RPD	RPD Limit
			Qual
			N

Sample ID: 0803222-01BMS	Batch ID: 29611	TestNo: E418.1	Units: mg/Kg-dry
SampType: MS	Run ID: IR207_080325A	Analysis Date: 03/25/08 10:30 AM	Prep Date: 03/25/08
Analyte	Result	RL	SPK value
Petroleum Hydrocarbons, TR	501	10.5	104.5
		Ref Val	%REC
		169.0	318
		LowLimit	HighLimit
		80	120
		%RPD	RPD Limit
			Qual
			SN

Sample ID: 0803222-01BMSD	Batch ID: 29611	TestNo: E418.1	Units: mg/Kg-dry
SampType: MSD	Run ID: IR207_080325A	Analysis Date: 03/25/08 10:30 AM	Prep Date: 03/25/08
Analyte	Result	RL	SPK value
Petroleum Hydrocarbons, TR	387	10.4	103.8
		Ref Val	%REC
		169.0	210
		LowLimit	HighLimit
		80	120
		%RPD	RPD Limit
		25.6	20
			Qual
			SRN

Qualifiers:	B	Analyte detected in the associated Method Blank	R	RPD outside accepted control limits
	DF	Dilution Factor	RL	Reporting Limit
	J	Analyte detected between MDL and RL	S	Spike Recovery outside control limits
	MDL	Method Detection Limit	N	Parameter not NELAC certified
	ND	Not Detected at the Method Detection Limit		

CLIENT: Larson & Associates  
Work Order: 0803137  
Project: Chevron Landfarm

## ANALYTICAL QC SUMMARY REPORT

RunID: IR207\_080325A

Sample ID:	ICV-080325	Batch ID:	418_S-03/25/08	TestNo:	E418.1	Units:	mg/Kg			
SampType:	ICV	Run ID:	IR207_080325A	Analysis Date:	03/25/08 10:30 AM	Prep Date:				
Analyte	Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual
Petroleum Hydrocarbons, TR	241	10.0	250.0	0	96.5	90	110			N

Sample ID:	CCV1-080325	Batch ID:	418_S-03/25/08	TestNo:	E418.1	Units:	mg/Kg			
SampType:	CCV	Run ID:	IR207_080325A	Analysis Date:	03/25/08 10:30 AM	Prep Date:				
Analyte	Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual
Petroleum Hydrocarbons, TR	244	10.0	250.0	0	97.8	85	115			N

Qualifiers:	B	Analyte detected in the associated Method Blank	R	RPD outside accepted control limits
	DF	Dilution Factor	RL	Reporting Limit
	J	Analyte detected between MDL and RL	S	Spike Recovery outside control limits
	MDL	Method Detection Limit	N	Parameter not NELAC certified
	ND	Not Detected at the Method Detection Limit		

CLIENT: Larson & Associates  
Work Order: 0803137  
Project: Chevron Landfarm

**ANALYTICAL QC SUMMARY REPORT**

RunID: PMOIST\_080319B

Sample ID:	0803180-01B DUP	Batch ID:	PMOIST_080319B	TestNo:	D2216	Units:	WT%			
SampType:	DUP	Run ID:	PMOIST_080319B	Analysis Date:	03/19/08 04:57 PM	Prep Date:	03/19/08			
Analyte	Result	RL	SPK value	Ref Val	%REC	LowLimit	HighLimit	%RPD	RPD Limit	Qual
Percent Moisture	29.3	0	0	30.62				4.32	30	N

Qualifiers:	B	Analyte detected in the associated Method Blank	R	RPD outside accepted control limits
	DF	Dilution Factor	RL	Reporting Limit
	J	Analyte detected between MDL and RL	S	Spike Recovery outside control limits
	MDL	Method Detection Limit	N	Parameter not NELAC certified
	ND	Not Detected at the Method Detection Limit		



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

February 19, 2008

Mr. Rodney Bailey  
Environmental Specialist  
MidContinent SBU  
Chevron North America Exploration and Production Company  
15 Smith Road  
Midland, Texas 79705

**RE: 2007 Sampling Results of Chevron Centralized Landfarm  
Centralized Surface Waste Management Facility Permit NM-2-0012  
W/2 of Section 17, Township 24 South, Range 36 East, NMPM  
Lea County, New Mexico**

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (OCD) has reviewed the compendium of sampling results, dated September 21, 2007, obtained during 2007, submitted by Larson & Associates, Inc. on the behalf of Chevron North America Exploration and Production Company (Chevron) for the Chevron Centralized Landfarm Permit NM-2-012 located in the W/2 of Section 17, Township 24 South, Range 36 East, NMPM of Lea County, New Mexico. OCD has determined that Chevron has demonstrated Cells 22, 23, and 24 satisfy the treatment zone closure performance standards as specified in Subsection F of Section 15 of 19.15.36 NMAC. Therefore, OCD approves the closure of Cells 22, 23, and 24.

The September 21, 2007 submittal requested the approval of the closure of Cell 17. The comparison of the testing results to the background concentrations did not support the request. OCD recommends re-sampling Cell 17 to confirm the September 11, 2007 results and to determine if a statistical significant increase has occurred.

As for the cells that require additional tilling and remediation, treatment and vadose zone monitoring are required pursuant to the conditions of Permit NM-2-12 and the transitional provisions of 19.15.36 NMAC. As a reminder, the specified test method for TPH is EPA method 418.1. The combined results of the GRO and DRO testing are not an acceptable substitute.

Chevron shall continue quarterly vadose zone monitoring and reporting until the contaminated soils are remediated. After Chevron adequately demonstrates to the OCD that all of the

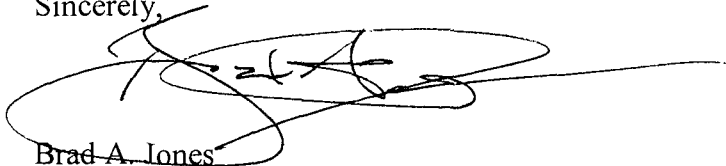


Mr. Bailey  
February 19, 2008  
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remaining cells have achieved the remediation standards, OCD will require Chevron to submit a closure plan for review and approval.

If you have any questions, regarding this matter, please do not hesitate to contact me at (505) 476-3487 or [brad.a.jones@state.nm.us](mailto:brad.a.jones@state.nm.us).

Sincerely,

A handwritten signature in black ink, appearing to read "Brad A. Jones", is written over a horizontal line. The signature is stylized with loops and a long horizontal stroke extending to the right.

Brad A. Jones  
Environmental Engineer

BAJ/baj

cc: OCD District I Office, Hobbs  
Mark Larsen, Larsen & Associates, Inc., Midland, Texas 79710