31 October 2014

Mr. Mike Bratcher Environmental Specialist NMOCD 811 S. First St. Artesia, New Mexico 88210

Re: Initial C-141
Chevron
Indian Draw Tank Battery
UL-J, Section 18, Township 22 South, Range 28 East
Eddy County, New Mexico

Mr. Bratcher:

Environmental Plus, Inc. (EPI), on behalf of Mr. Stephen Gwin, Chevron Corporation (Chevron), submits the attached form C-141 for the above-referenced leak site, located on land owned by the BLM.

The site is located approximately six (6) miles east of Carlsbad, New Mexico (reference *Figure 1*). A search for water wells was completed utilizing the New Mexico Office of the State Engineer's website and a United States Geological Survey (USGS) database. A total of eleven (11) wells are located in the area surrounding the release site (reference *Table 1*). No wells (domestic, agriculture or public) and no bodies of surface water exist within a 1,000-foot radius of the release site (reference *Figure 2*). Groundwater data indicated the average water depth is approximately 25 feet below ground surface (bgs). The attached site information and metrics form ranks the site in accordance with the NMOCD Guidelines for Remediation of Leaks, Spills and Releases (August 13, 1993).

Approximately 13 bbls of produced water and oil were released when a valve was left open and fluid gravity fed to the ground; approximately 11 bbls were recovered (reference *Figure 3* and attached photographs). Based on available information, it was projected distance between impacted soil and groundwater is approximately 25 vertical feet. Utilizing this information, NMOCD Recommended Remedial Action Levels (RRALs) for this Site were determined as follows:

Parameter	Recommended Remedial Action Level
Benzene	10 parts per million
BTEX	50 parts per million
TPH	100 parts per million
Chloride	250 parts per million



This tank battery is scheduled to be replaced in February 2015 with construction of the new battery location currently underway. Chevron proposes the stained caliche in the area of the release be removed, hauled to state approved disposal facility, and replaced with clean caliche. Full remediation of the old tank battery area shall occur when the new tank battery comes online.

Should you have any questions or concerns please feel free to contact me at (575) 394-3481 or via email at <a href="mailto:ddominguezepi@gmail.com">ddominguezepi@gmail.com</a> or Mr. Stephen Gwin at (575) 263-0427 or via e-mail at <a href="mailto:stephen.gwin@chevron.com">stephen.gwin@chevron.com</a>. All official communication should be addressed to:

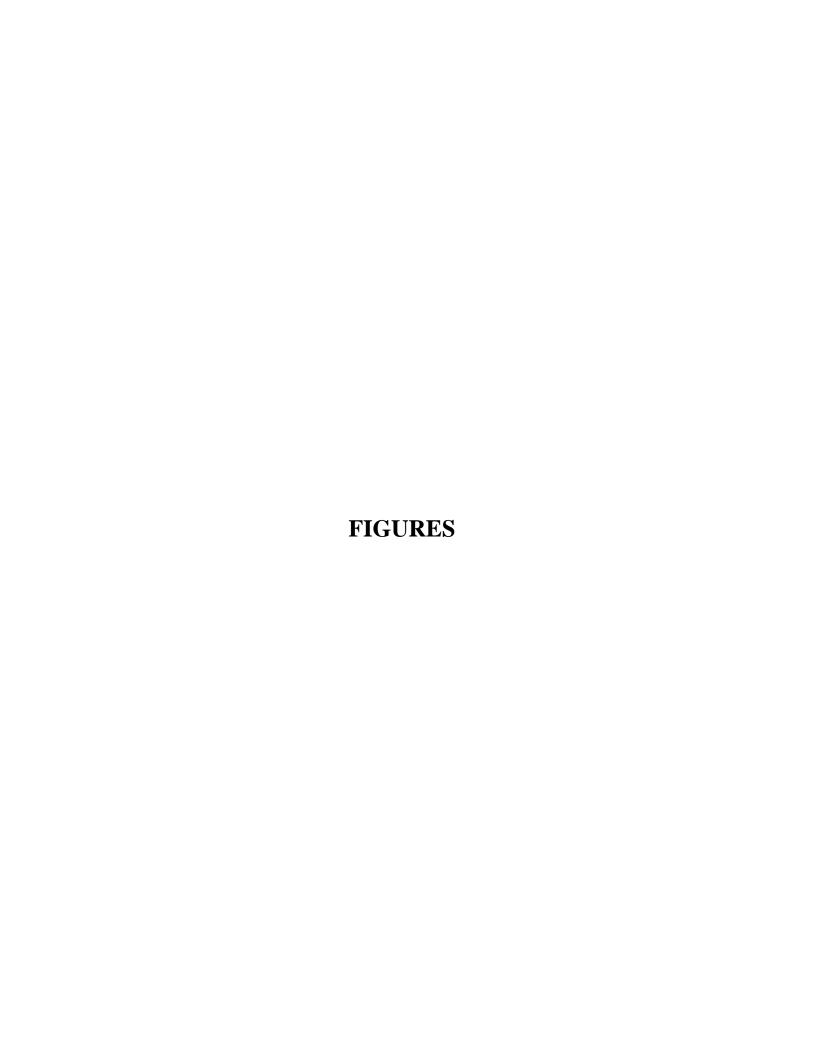
Mr. Stephen Gwin Chevron Delaware Basin, Hobbs FMT 1616 West Bender Hobbs, New Mexico 88240

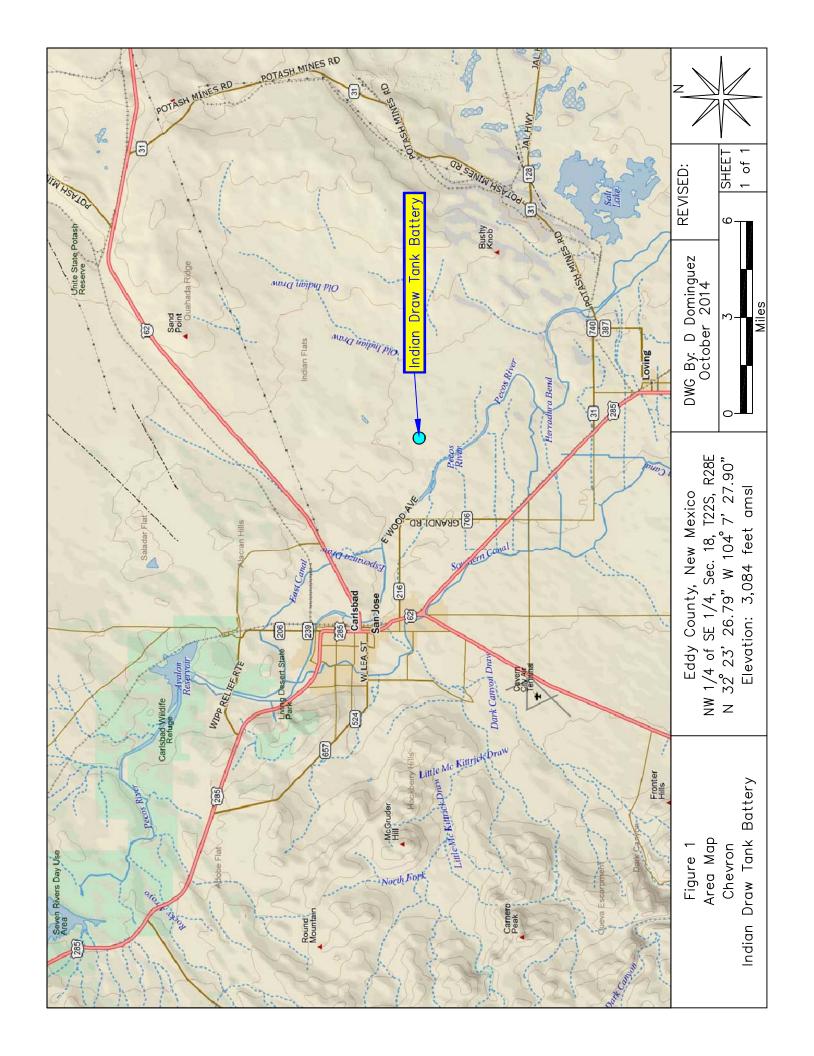
Sincerely,

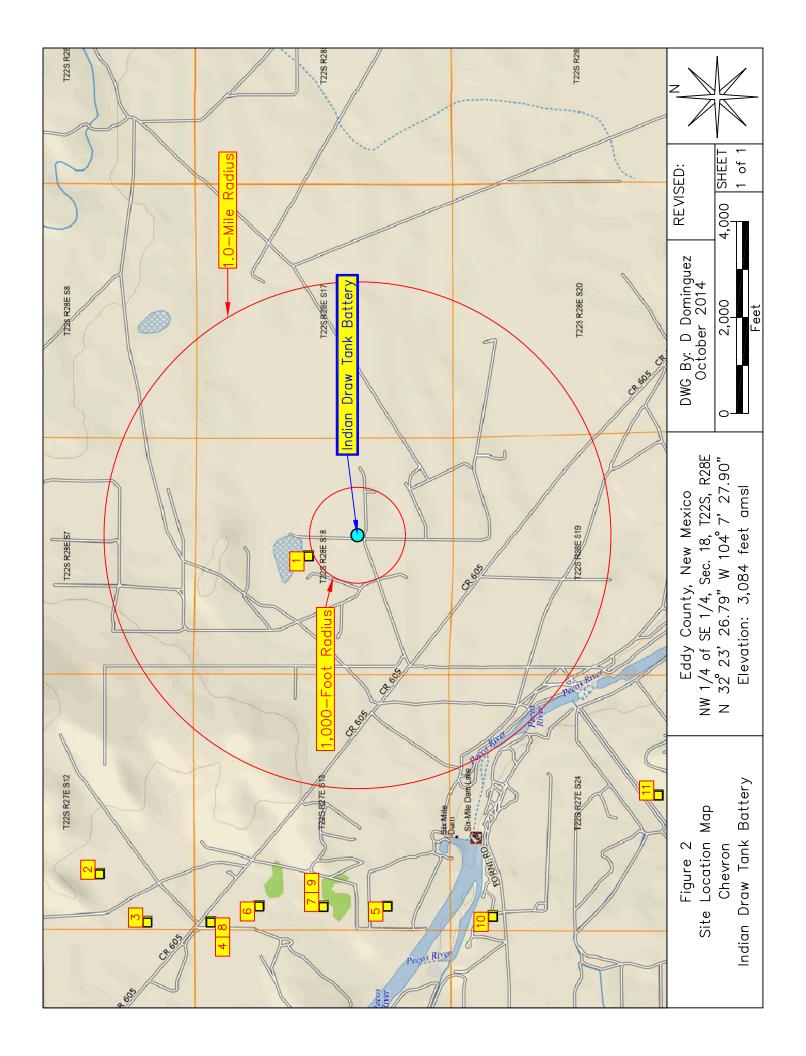
ENVIRONMENTAL PLUS, INC.

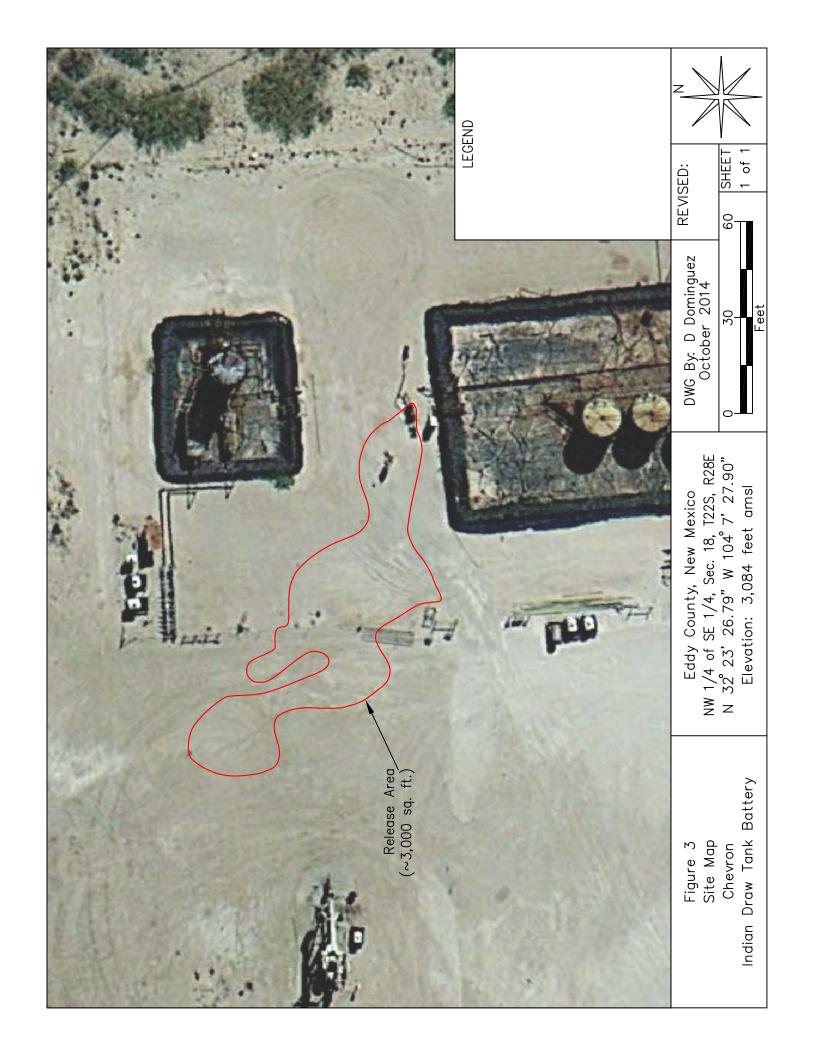
Daniel Dominguez Environmental Consultant

cc: Stephen Gwin – HE Specialist, Chevron – Hobbs, NM Jim Amos – BLM – Carlsbad, NM File









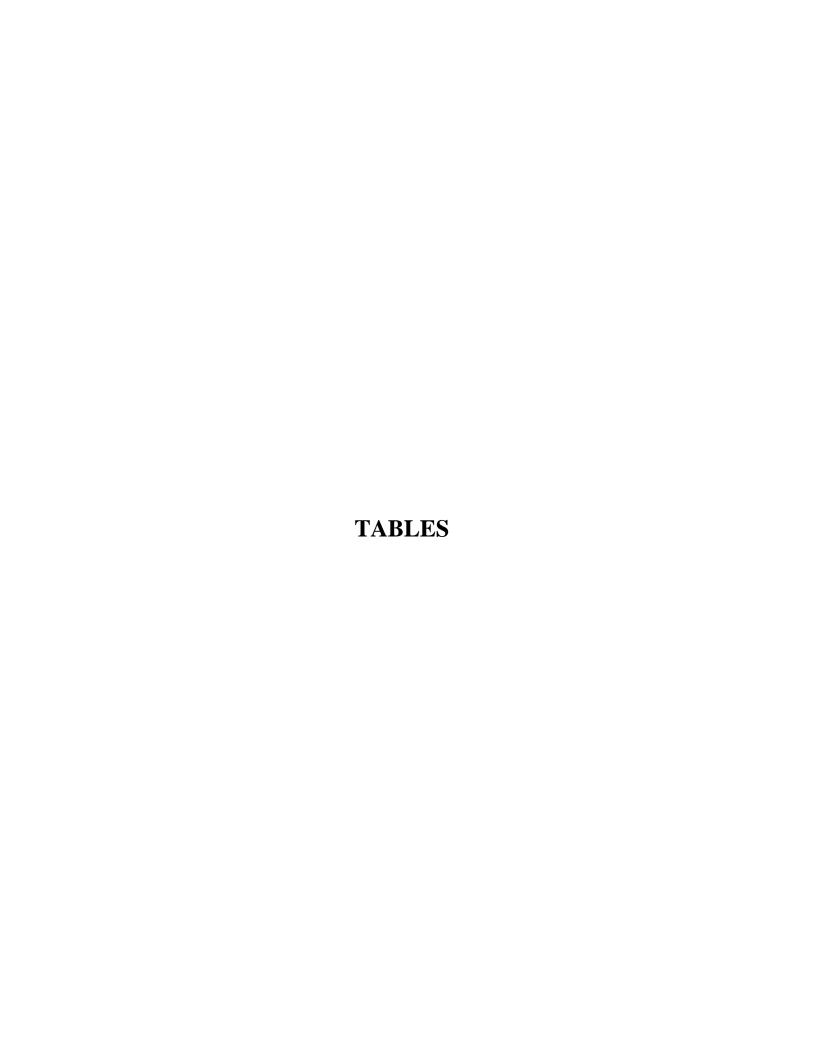


TABLE 1

## Well Data

# Chevron - Indian Draw Tank Battery

Ref #	Well Number	Use	Diversion <sup>A</sup>	Owner	q64	q64 q16	d4	Sec 1	q4 Sec Twsp Rng		Easting	Northing	Date Measured	Surface Elevation <sup>B</sup>	Depth to Water
															(ft bgs)
1	C 01508	PRO	0	AMOCO PRODUCTION COMPANY	1	1	4	18	22S	28E	582206	3584195	25-Aug-73	3,081	
2	C 02529	DOM	3	CARLA SLUSHER			3	12	22S	27E	580174	3585501	86-deS-50	3,083	51
3	C 01088	DOM	3	GEORGE E. MCGONAGILL, JR.	3	3	3	12	22S	27E	579872	3585199	13-Aug-62	3,072	36
4	C 00836	DOM	3	WILLIAM T. WELDY	3	1	1	13	22S	27E	579874	3584794	20-Jul-68	3,068	52
5	C 00971	DOM	3	JOHN SEARS		3	3	13	22S	27E	579981	3583679	13-Oct-60	3,064	18
9	C 01590	DOL	3	MARY E CHISM		3	1	13	22S	27E	279977	3584489	30-Jun-75	3,068	40
7	C 01677	PRO	3	PATRICK F EDEAL JR		1	3	13	22S	27E	616615	3584084	19-May-76	3,066	20
8	C 01722	DOM	3	DEWEY CONNELL	3	1	1	13	22S	27E	579874	3584794	10-Sep-77	3,068	64
6	C 03126	PRO	0	MEWBOURNE OIL		1	3	13	22S	27E	616615	3584084	19-May-76	3,066	20
10	C 03514	DOM	1	BARBARA BALLA	1	3	1	24	22S	27E	579923	3583010	3583010 19-Aug-11	3,075	31
11	C 00294	IRR	837	FERGUSON FARMS (PARTNERSHIP)	3	3	4	24	22S	27E	580701	3581970	24-Feb-52	3,058	15

\* = Data obtained from the New Mexico Office of the State Engineer Website (http://iwaters.ose.state.nm.us:7001/iWATERS/wr\_RegisServlet1) and USGS Database

 $^{\rm A}$  = In acre feet per annum

 $^{\rm B}$  = Elevation interpolated from USGS topographical map based on referenced location. PRO = 72-12-1 Prospecting or development of a natural resource

DOM = 72-12-1 Domestic one household DOL = 72-12-1 Domestic and Livestock watering

IRR = Irrigation

quarters are 1=NW, 2=NE, 3=SW, 4=SE; quarters are smallest to biggest



### ATTACHMENT I PHOTOGRAPHS



Photograph #1- Lease sign



Photograph #2- Looking across tank battery.



Photograph #3- Looking across release area.



Photograph #4- Looking across release area.



Photograph #5- Looking across release area.



Photograph #6- Looking across release area.

#### ATTACHMENT II INFORMATION AND METRICS INITIAL C-141

**Incident Date:** 10/18/14

**NMOCD Notified:** 

10/20/14

**Information and Metrics** 

Site: Indian Draw Tank Battery

Assigned Site Reference #:

Company: Chevron

Street Address: 2401 Avenue 'O'

**Mailing Address:** 

City, State, Zip: Eunice, NM 88231

Representative: Stephen Gwin

**Representative Telephone:** (575) 263-0427

Telephone:

Fluid volume released (bbls): ~13 bbls Recovered (bbls): ~11 bbls

>25 bbls: Notify NMOCD verbally within 24 hrs and submit form C-141 within 15 days.
(Also applies to unauthorized releases >500 mcf Natural Gas)

5-25 bbls: Submit form C-141 within 15 days (Also applies to unauthorized releases of 50-500 mcf Natural Gas)

Leak, Spill, or Pit (LSP) Name: Indian Draw Tank Battery

**Source of contamination:** valve was left open **Land Owner, i.e., BLM, ST, Fee, Other:** BLM

**LSP Dimensions:** ~132 feet by 48 feet

**LSP Area:** ~3,000 ft<sup>2</sup>

**Location of Reference Point (RP):** 

Location distance and direction from RP:

**Latitude:** N 32° 23′ 26.79″ **Longitude:** W 104° 7′ 27.90″

Elevation above mean sea level: 3,084 feet

Feet from North Section Line: Feet from West Section Line:

**Location- Unit or 1/41/4:** NW1/4 of the SE1/4 **Unit Letter:** J

Location- Section: 18 Location- Township: T22S Location- Range: R28E

Surface water body within 1000 'radius of site: none

Domestic water wells within 1000' radius of site: none

 $\begin{tabular}{ll} \textbf{Agricultural water wells within 1000' radius of site:} & none \end{tabular}$ 

Public water supply wells within 1000' radius of site: none

Depth from land surface to ground water (DG): ~25'

Depth of contamination (DC): unknown

Depth to ground water (DG – DC = DtGW):  $\sim 25$ 

1. Ground Water	2. Wellhead Protection Area	3. Distance to Surface Water Body			
If Depth to GW <50 feet: 20 points	If <1000' from water source, or;<200' from	<200 horizontal feet: 20 points			
If Depth to GW 50 to 99 feet: 10 points	private domestic water source: 20 points	200-100 horizontal feet: 10 points			
If Depth to GW >100 feet: 0 points	If >1000' from water source, or; >200' from private domestic water source: 0 points	>1000 horizontal feet: 0 points			

Site Rank (1+2+3) = 20 + 0 + 0 = 20

**Total Site Ranking Score and Acceptable Concentrations** 

Parameter	>19	10-19	0-9						
Benzene <sup>1</sup>	10 ppm	10 ppm	10 ppm						
BTEX <sup>1</sup>	50 ppm	50 ppm	50 ppm						
TPH	<b>100 ppm</b> 1,000 ppm 5,000 ppm								
<sup>1</sup> 100 ppm field	<sup>1</sup> 100 ppm field VOC headspace measurement may be substituted for lab analysis								

<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240 District II 1301 W. Grand Avenue, Artesia, NM 88210 District III
1000 Rio Brazos Road, Aztec, NM 87410 District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505

#### State of New Mexico Energy Minerals and Natural Resources

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

Form C-141 Revised October 10, 2003

Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

#### **Release Notification and Corrective Action**

	OPERATOR											
Name of Company: Chevron Contact: Stephen Gwin												
Address:	<b>Address:</b> 2401 Avenue 'O' Eunice, NM 88231 <b>Telephone No.:</b> (575) 263 – 0427											
Facility Na	ame: Ind	lian Draw	Tank Ba	attery	1	Facility Typ	e: tank batter	у				
Surface O	Surface Owner: BLM Mineral Owner: API:											
STATE OF THE PARTY												
	Unit Letter   Section   Township   Range   Feet from the   North/South Line   Feet from the   East/West Line   County									-		
Unit Letter J	Section 18	Township 22S	Range 28E	Feet from the	Nor	Eddy						
		Lat	titude: ]	N 32° 23' 26.79	<u>9"</u> L	ongitude: <u>W</u>	/ 104° 7' 27.9	0"				
				NATURE	E OF	RELEASE						
Type of Relea						Volume of Re	lease: ~13 bbls	Volume R				
	ease: valve	was left open	and fluid	gravity fed to the			r of Occurrence:	Date and I				
ground 10/18/14 @ am 10/18/14 @ 5:00 am  Was Immediate Notice Given? If YES, To Whom?												
Yes No Not Required Mike Bratcher, NMOCD												
By Whom? Stephen Gwin Date and Hour: 10/20/14												
Was a Watercourse Reached?  ☐ Yes ☑ No  If YES, Volume Impacting the Watercourse:  Not Applicable												
Depth to Wat												
If a Watercou	rse was In	pacted, Desc	ribe Fully	.* Not Applicable								
Describe Cause of Problem and Remedial Action Taken.* Approximately 13 bbls of produced water and oil were released when a valve was left open and fluid gravity fed to the ground. A vacuum truck was dispatched to pick up any free standing liquids. Approximately 11 bbls were recovered.												
battery is sche- stained caliche the old tank ba to Cardinal La	Describe Area Affected and Cleanup Action Taken.* Approximately 3,000 square feet of surface area was impacted by the release. This tank battery is scheduled to be replaced in February 2015 with construction of the new battery location currently underway. Chevron proposes the stained caliche in the area of the release be removed, hauled to state approved disposal facility, and replaced with clean caliche. Full remediation of the old tank battery area shall occur when the new tank battery comes online. At that time soil samples will be collected from the area and submitted to Cardinal Laboratories for testing. Upon receipt of laboratory analytical data from soil samples to be collected during delineation operations, EPI will prepare and present a Remediation Proposal for NMOCD approval.								ses the mediation of and submitted			
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.								which may ve the and water, esponsibility				
Signature:	Stal	1				OII	L CONSERV	ATION DIV	<u>/ISION</u>			
Printed Name	Stephen (	Gwin			A	Approved by Dis	strict Supervisor:					
Title: HE Spec		JAAIII.			A	Approval Date:		Expiration I	Date:			
E-mail Addre	0.	n.gwin@chev	ron.com			Conditions of Ap	pproval:	- Sapitation I		d □		
Date:		Phone: (5	75) 263-04	7 Attached								

<sup>\*</sup> Attach Additional Sheets If Necessary