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May 15, 2020

New Mexico Oil Conservation Division – District 1
1625 N. French Drive
Hobbs, New Mexico 88240

**Re: Closure Request – H.T. Mattern D & F #3 Battery
Case No. 1RP-56
Lea County, New Mexico**

Dear New Mexico Oil Conservation Division:

Chevron Environmental Management Company (CEMC) submits herein to the New Mexico Oil Conservation Division (OCD) a closure request for 1RP-56, H.T. Mattern D & F #3 Battery (Site), which is located in Unit A, Section 1, Township 22 South, Range 36 East in Lea County, New Mexico.

During a file review within the OCD electronic database, the only available record for this Site is a *Receipt of Work Plan* correspondence letter dated June 30, 1999. A copy of the correspondence is provided as Attachment 1 along with a copy of the work plan that was prepared and submitted by Safety & Environmental Solutions, Inc (SESI). An extensive file search was also completed outside of the OCD database that revealed a closure report was submitted to the OCD in July 1999. The closure report titled, *H.T. Mattern D & F #3 Tank Battery Closure Report*, and dated July 19, 1999 was prepared by SESI. A complete copy of the submitted report is currently not available, however, an incomplete copy of the report was obtained from SESI and is provided as Attachment 2.

Based on the assessment and remedial actions completed which meet the target regulatory levels obtained from the OCD in 1999, CEMC respectfully requests that the OCD consider closure of 1RP-56. A final C-141 closure form is provided as Attachment 3.

If you have any questions regarding this submittal, please contact me at (832) 854-5620 or via email at agifford@chevron.com.

Respectfully,

**Chevron Environmental Management Company
on behalf of
Chevron U.S.A. Inc.**

A handwritten signature in blue ink, appearing to read "Adriane Gifford".

Adriane Gifford
Project Manager

Attachments

ATTACHMENT 1

MISC.

CORRESPONDENCE

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENTOIL CONSERVATION DIVISION
DISTRICT I HOBBS
1625 N. French Dr., Hobbs, NM 88240
(505) 393-6161
FAX (505) 393-0720Jennifer A. Salisbury
CABINET SECRETARY

June 30, 1999

Mr. Rick Massey
Chevron USA
P.O. Box 1949
Eunice, NM 88231

RECEIVED

JUL 09 1999

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISIONRe: H.T. Mattern D & F #3 Battery Site
UL A, Sec 1, Ts22S, R36E

Dear Mr. Massey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of Chevron USA's (CUSA) Work Plan dated June 17, 1999 for the above referenced site submitted by Safety & Environmental Solutions, Inc. **The plan is hereby approved and subject to the following conditions:**

1. CUSA will notify the NMOCD at least 48 hours in advance of the scheduled activities such that the NMOCD has the opportunity to witness the events and split samples.
2. CUSA will provide the NMOCD with a final report containing the results of the remedial actions. The report will be submitted to the NMOCD Hobbs District Office by September 1, 1999.

Please be advised that NMOCD approval of this plan does not relieve CUSA of liability should their operations fail to adequately investigate and remediate contamination that poses a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve CUSA of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you require any further information or assistance please do not hesitate to call (505) 393-6161 ext...113 or write this office.

Sincerely Yours,

Donna Williams-Environmental Engineer

Cc: Chris Williams-NMOCD District I Supervisor
Bill Olson-Environmental Bureau, Santa Fe, NM

Work Plan

H. T. Mattern D & F #3 Battery Site

Chevron USA

Purpose

The purpose of this work plan is to cause the cleanup of the spill at the tank battery site located in Unit A of Section 1, Township 22S, Range 36E, Lea County, New Mexico. This plan will allow remediation in a manner that will protect the population, environment and groundwater of the area surrounding the subject location.

Background

On June 16, 1999, Chevron USA secured the services of Safety and Environmental Solutions, Inc. to complete all necessary sampling and testing of the spill at the area known as the H. T. Mattern D & F #3 Battery site. According to the State of New Mexico water well database, the groundwater in the area is at 111.24'.

Four (4) trenches holes were completed at the spill site and the adjacent lease road. The analytical results have been previously reported to the New Mexico Oil Conservation Division in the report dated June 17, 1999, *Chevron USA Site Assessment, H. T. Mattern D & F #3 Battery Site*. The results of this assessment revealed the vertical extent of contaminated soils from 12" to 18" at various locations on the subject site.

Knowledge of process indicates that the material in this area would be exempt oil field waste.

Method

Chevron USA has determined the most appropriate course of action is to remediate the soil onsite to the approved TPH level of 1,000ppm. The area inside the fence will be excavated, blended with clean soil that has been hauled in and tested to confirm acceptable TPH levels. The soil will then be backfilled and returned to grade.

The pipeline right-of-way area will also be excavated, blended with clean soil onsite, tested to ensure acceptable TPH levels and then backfilled into the excavation. The spill run area will then be contoured back to grade.

ATTACHMENT 2

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H. T. Mattern D & F #3 Tank Battery Closure Report Lea County, New Mexico

July 19, 1999

*Safety & Environmental Solutions, Inc.
703 E. Clinton Suite 103
Hobbs, New Mexico 88240
(505) 397-0510*

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**H. T. Mattern D & F #3 Closure Report
July 19, 1999****Chevron USA****I. Physical Description**

The legal description of the leak site is in Unit A of Section 1, Township 22S, Range 36E, Lea County, New Mexico (Figure 1).

II. Background

The site consists of a two (2) tank battery station with an adjacent lease road. This area is used for the storage and transfer for transportation of fluids produced by wells of the Mattern lease by Chevron USA. A spill and subsequent runoff area into the lease road was investigated. There was visual evidence of prior leaks observed on the surface.

III. Contaminant and Size of Leak

The leak at the tank battery resulted in crude oil being discharged approximately 12" to 18" underground, pooling around the auxiliary piping inside the fence, then streaming to the east along a pipeline right of way for approximately 400' with widths varying from 1' to 2'. (Site Plan)

IV. Vertical and Horizontal Extent of Contamination

On June 16, 1999, SESI drilled four (4) test borings at the spill site. The purpose of the borings was to determine the vertical extent of the contamination. Each boring was drilled to a depth of 12" to 18" with the samples taken from undisturbed soil with a split spoon sampler. The samples were field tested for TPH with a General Analysis Corporation Mega-TPH Total Petroleum Hydrocarbon Analyzer using EPA Method 418.1. The results of the vertical extent investigation are as follows:

ID/ Depth	TPH
1 – 12"	194ppm
2 – 18"	39ppm
3 – 12"	32ppm
4 – 12"	34ppm

V. Surface Water and Waterways

The distance to the nearest surface water is in excess of 1 mile.

VI. Groundwater

H. T. Mattern D & F #3 Closure Report
July 19, 1999

Chevron USA

The nearest water well on record with the New Mexico State Engineer and the United States Geological Survey in Albuquerque are in excess of 1 mile away. The groundwater in the area is at 111.24'.

VII. Soil Information

The soils of the area are of the Berino-Cacique association. These soils are nearly level and gently sloping, sandy soils that are deep to moderately deep to soft to indurated caliche.

VIII. Work Performed

Excavation of contaminated soils and blending of these soils was begun on July 7, 1999. Composite samples were taken of the final excavation of sides and bottom on June 9th and taken to a third party laboratory for analysis for Total Petroleum Hydrocarbons (TPH - EPA Method 8015), BTEX (Benzene, Toluene, Ethyl Benzene and Total Xylenes - EPA Method 8020) and Chlorides. Soil sampling was performed on soils from each test hole using SOPs found in **Environmental Protection Agency, 1984, Characterization of Hazardous Waste Site - A Methods Manual: Vol II**. Field tests were run on composite samples for TPH during blending onsite. (See Analytical Results) The test results from Cardinal Laboratories are as follows:

<u>Site</u>	<u>TPH</u>	<u>Benzene</u>	<u>Toluene</u>	<u>E. Benzene</u>	<u>T.Xylenes</u>
Area A Side	571ppm	<.002ppm	<.002ppm	<.002ppm	<.006ppm
Area A Btm.	<100ppm	<.002ppm	<.002ppm	<.002ppm	<.006ppm

A final surface composite sample was taken of the spill run area after completion of the work on July 12, 1999. The results from Cardinal laboratories are as follows:

<u>Site</u>	<u>TPH</u>	<u>Benzene</u>	<u>Toluene</u>	<u>E. Benzene</u>	<u>T.Xylenes</u>
Area A Final	1170ppm	<.002ppm	.003ppm	.002ppm	.007ppm

The area inside the fence next to the tank battery was excavated to a depth of approximately 12" in the leak areas to remove the fresh contamination. Extensive historical contamination was uncovered at this time. The contaminated soils were removed outside the fenced area and blended with fresh soil from offsite to achieve the target regulatory levels of 5000ppm obtained from Donna Williams of the NMOCD. A final surface composite of the area inside the fence was taken on July 12, 1999 and the results from Cardinal Laboratories is as follows:

<u>Site</u>	<u>TPH</u>	<u>Benzene</u>	<u>Toluene</u>	<u>E. Benzene</u>	<u>T.Xylenes</u>
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H. T. Mattern D & F #3 Closure Report
July 19, 1999

Chevron USA

Area B Final 3991ppm <.002ppm <.002ppm .003ppm .014ppm

VIII. Figures and Appendices

Figures:

Vicinity Map

Site Plan

Photo Exhibits

Appendices:

Laboratory Analytical Results

***H. T. Mattern D & F #3 Closure Report
July 19, 1999***

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Figure 1 Vicinity Map

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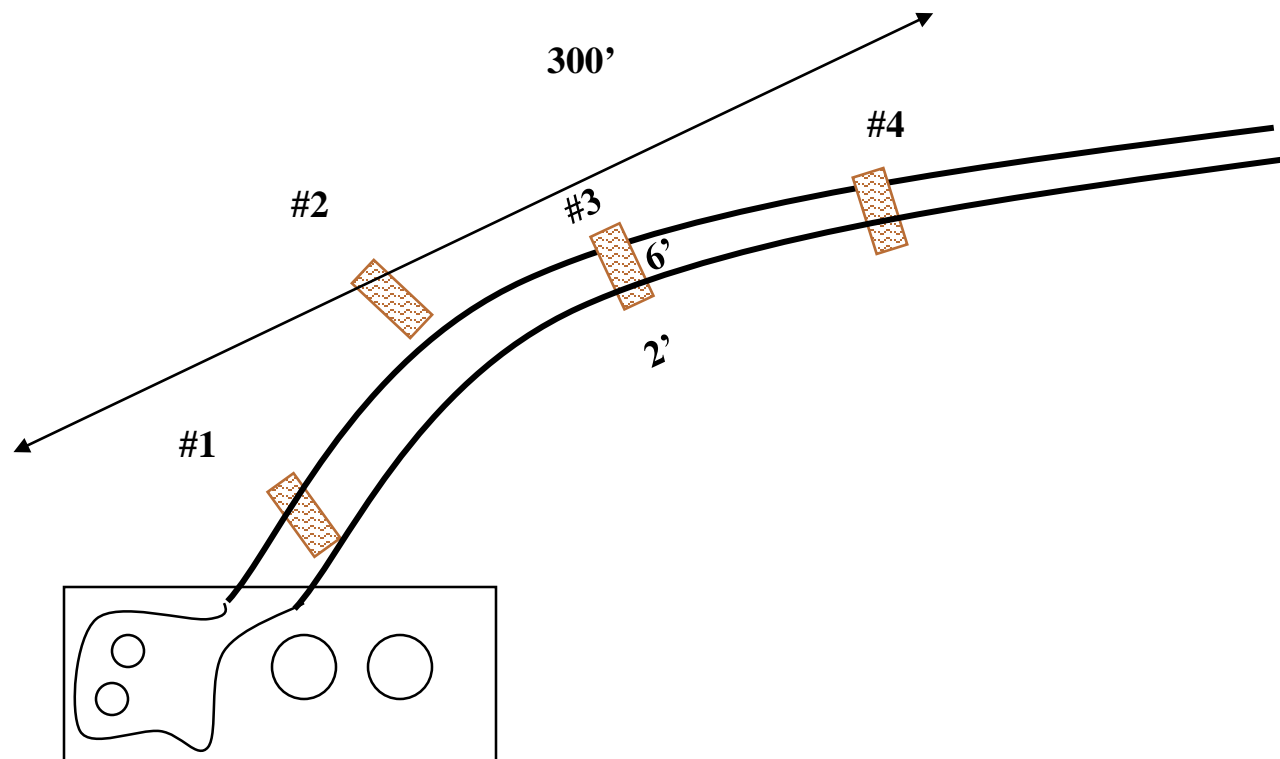
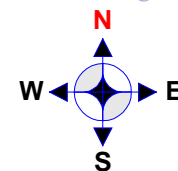
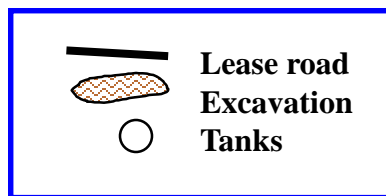
**H. T. Mattern D & F #3 Tank
Battery Leak Site
Vicinity Map**

*Safety & Environmental
Solutions, Inc.
Hobbs, NM*

H. T. Mattern D & F #3 Closure Report
July 19, 1999

Chevron USA

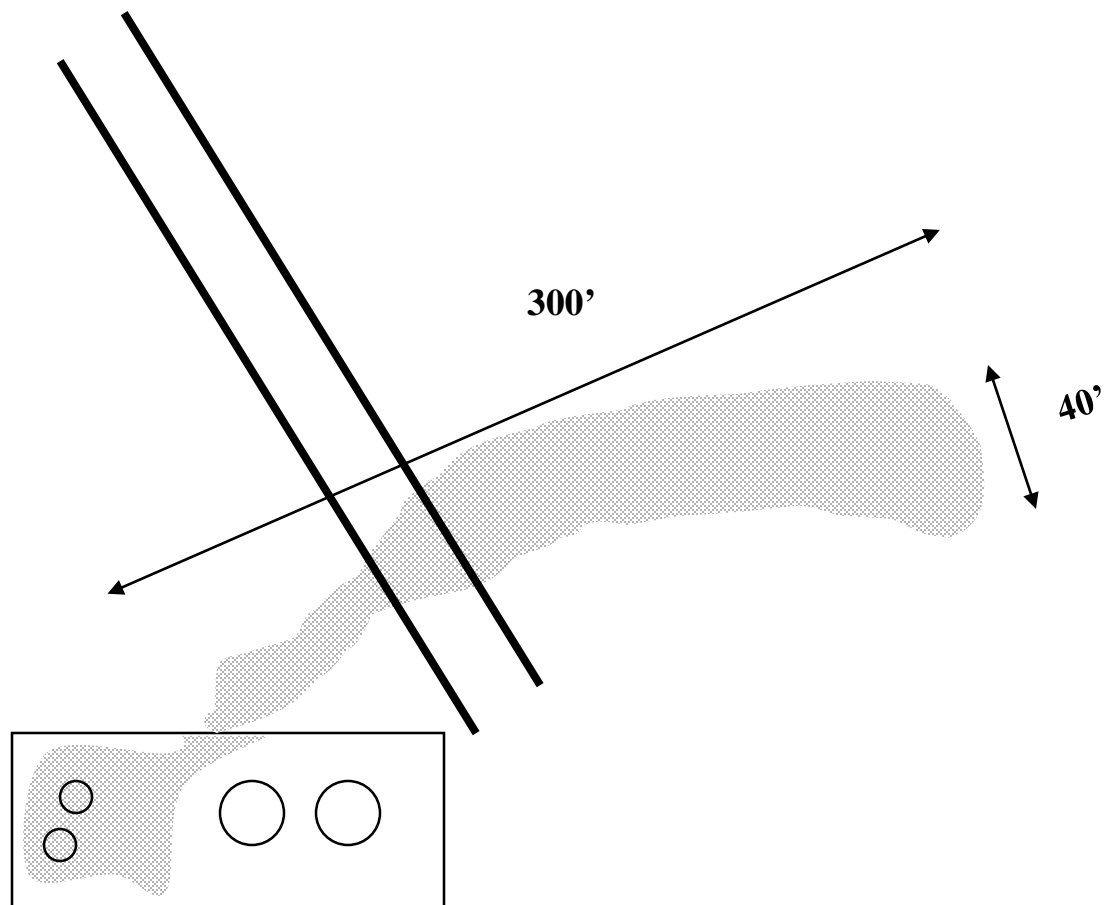
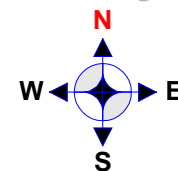
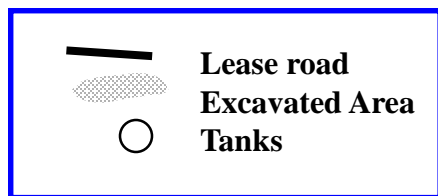
Figure 2 Site Plan



Chevron USA
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H. T. Mattern D & F #3 Battery Leak Site Plan

Safety & Environmental Solutions, Inc.
Hobbs, New Mexico



Chevron USA
Production

H. T. Mattern D & F #3 Battery Final Site Plan

Safety & Environmental Solutions, Inc.
Hobbs, New Mexico

***H. T. Mattern D & F #3 Closure Report
July 19, 1999***

Chevron USA

Figure 3 Photo Exhibits

H.T. Mattern D & F #3 Site - Before Excavation

H.T. Mattern D & F #3 Site - Before Excavation

H.T. Mattern D & F #3 - Before Excavation

H.T. Mattern D & F #3 - During Excavation

H.T. Mattern D & F #3 - During Excavation

H.T. Mattern D & F #3 - During Blending

H.T. Mattern D & F #3 - Final Area A

H.T. Mattern D & F #3 - Final Area B

*H. T. Mattern D & F #3 Closure Report
July 19, 1999*

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Appendix A Laboratory Analyticals

ATTACHMENT 3

Incident ID	NRM2014046014
District RP	1RP-56
Facility ID	
Application ID	

Closure


The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

Closure Report Attachment Checklist: *Each of the following items must be included in the closure report.*

- ☒ A scaled site and sampling diagram as described in 19.15.29.11 NMAC *Provided within the Tank Battery Closure Report, Dated July 19, 1999*
- ☒ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection) *Photographic documentation was provided within the original Tank Battery Closure Report submittal to the OCD, Dated July 19, 1999; however, no photographic documentation is available to include with this duplicate copy of the report.*
- ☒ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☒ Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Adriane Gifford Title: Environmental Project Manager

Signature:  Date: 05/15/2020

email: agifford@chevron.com Telephone: 832-854-5620

OCD Only

Received by: _____ Date: _____

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: Jennifer Nobui Date: 01/12/2022

Printed Name: Jennifer Nobui Title: E Spec A

District I

1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720

District II

811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720

District III

1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170

District IV

1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 8323

CONDITIONS

Operator: CHEVRON U S A INC 6301 Deauville Blvd Midland, TX 79706	OGRID: 4323
	Action Number: 8323
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
jnobui	OCD will not debate at this time your contention of allowing 5,000 mg/kg TPH to remain.	1/12/2022