

New Mexico Oil Conservation District II  
811 South First Street  
Artesia, New Mexico 88240

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Subject:  
South Culebra Bluff 13 Federal #4 Closure Request  
Letter of Violation - Inspection No. iTM1734238246  
Eddy County, New Mexico

ENVIRONMENT

Date:  
January 17, 2020

Dear whom it concerns:

Contact:  
Scott Foord

On behalf of Chevron Environmental Management Company (CEMC), Arcadis U.S., Inc. (Arcadis) prepared this closure request for the South Culebra Bluff 13 Federal #4 (Site), API No. 30-015-26534, located in Eddy County, New Mexico. Rockcliff Operating New Mexico LLC (Rockcliff), the previous operator of the well, was notified by the New Mexico Oil Conservation District (NMOCD) of staining around the well head following an inspection (iT1734238246, Attachment 1) by NMOCD on December 8, 2017.

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## SITE DESCRIPTION AND BACKGROUND

Our ref:  
30009594

The well is located approximately two (2) miles east of Loving in Unit E, Section 12, Township 23S, Range 28E, Eddy County, New Mexico.

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

On December 8, 2017, during a routine inspection (iT1734238246) conducted by NMOCD, surface staining was observed around the well head. A letter of violation was issued to Rockcliff by the NMOCD for which no response from Rockcliff was identified.

## SOIL RESTORATION

On August 16, 2019, Chevron Operations excavated visually stained soil in the vicinity of the wellhead to an approximate depth of 3 – 4 feet below ground surface (bgs). Additionally, surrounding soil with observable staining was excavated to a depth of approximately 1 – 2 feet bgs. Backfilling, recontouring and grading was completed on August 23, 2019 (see attached photo log). Approximately 675 cubic yards of soil was removed and disposed at a NMOCD approved disposal facility. The excavated area was contoured to surrounding

grade and reseeded has been scheduled as part of restoration related to well abandonment activities. A figure of the excavated area is attached as Figure 1.

As requested in the Letter of Violation dated December 8, 2017, corrective actions have been completed so Arcadis, on behalf of CEMC, respectfully requests that the well be re-inspected for resolution of this matter.

Sincerely,

Arcadis U.S., Inc.



Scott Foord  
Project Manager

Enclosures:

**Figures**

- 1 Excavated Area Map

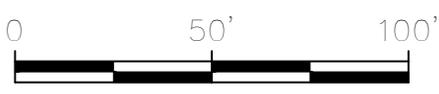
**Attachments**

- 1 Photograph Log



**LEGEND**

 EXCAVATED AREA



GRAPHIC SCALE



<b>CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY</b> <b>SCB 13-4</b> <b>LOVING, NEW MEXICO 88256</b>	
<b>EXCAVATED AREA MAP</b>	
	<b>FIGURE</b> <b>1</b>

## PHOTOGRAPH LOG

Chevron Environmental Management Company  
South Culebra Bluff 13 Federal #4



SCB 13 #4 surface staining prior to excavation, facing northwest



SCB 13 #4 additional view of surface staining prior to excavation, facing northwest

## PHOTOGRAPH LOG

Chevron Environmental Management Company  
South Culebra Bluff 13 Federal #4



SCB 13 #4 following excavation and during backfilling, facing north



SCB 13 #4 after backfilling, facing southwest

## PHOTOGRAPH LOG

Chevron Environmental Management Company  
South Culebra Bluff 13 Federal #4



SCB 13 #4 after backfill, facing southeast