

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Tuesday, November 28, 2017 9:14 AM
To: 'Chase Settle'; Weaver, Crystal, EMNRD
Cc: Bob Asher
Subject: RE: Kleeman PD Battery Characterization Plan 2RP-4422

RE: EOG Y Resources * Kleeman PD & Platt PA Battery * 2RP-4422 * DOR: 9/12/17

Chase,

Thanks for the revision. It is now OCD's understanding that as an initial response to the spill, approximately 1'-2' of impacted material was excavated. Your proposal for characterization of this release is approved. Please advise once the work has been scheduled.

I have no issues with your sampling events, and appreciate your past and continued cooperation. In dealing with an average of 40 – 60 releases per month, I have to work as efficiently as possible, so complete and concise submittals are very much appreciated. Sorry this response got delayed. This is my last proposal for October, so can now start working on November.

If you have any questions or concerns, please contact me.

Thanks Chase,

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Chase Settle [mailto:Chase_Settle@eogresources.com]
Sent: Tuesday, October 31, 2017 3:17 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: Bob Asher <Bob_Asher@eogresources.com>
Subject: RE: Kleeman PD Battery Characterization Plan 2RP-4422

Mike,

I apologize for those typos in regards to the site ranking, those have been corrected to show that the site ranking for the Kleeman PD Battery is a TEN (10). I have also corrected some other issues I noticed and corrected the formatting issues that had you perplexed, you should be able to view all pages without having to "rotate view" now.

As for Section V, I have put in the explanation that explains why the BTEX, TPH, and chloride numbers could be below RRALs within the first 4' of soil samples without having to go into a soil structure and matrix scientific study. If however this does not quell your concerns, NMOCD has an open invitation to be present and witness any and all of my sampling activities.

Thank you,

Chase Settle, M.S.

Rep Safety & Environmental II

EOG Resources

105 S. 4th Street

Artesia, NM 88210

575-748-4171 (Office)

575-703-6537 (Cell)



From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]

Sent: Tuesday, October 31, 2017 2:01 PM

To: Chase Settle <Chase.Settle@eogresources.com>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: Bob Asher <Bob.Asher@eogresources.com>

Subject: RE: Kleeman PD Battery Characterization Plan 2RP-4422

****External email. Use caution.****

RE: EOG Y Resources, Inc. * Kleeman PD & Platt PA Battery * 2RP-4422 * DOR: 9/12/17

Chase,

Your Characterization Plan for the above referenced release is not approved as submitted. There are a couple of things that may be just typos, but there are some issues, overall, with "V. Sampling Procedure" portion of the submittal. First, all the pages in the submittal except the Google Earth images are sideways, so the document had to be re-formatted just to review. Paragraph labeled "IV. NMOCD Ranking Criteria" states "The ranking for this site is zero (10) based on the following" You have called depth to ground water at 58', so site ranking is ten (10). In part "V Sampling Procedure", the last sentence in the first paragraph calls the site ranking a zero as well.

Also, in that paragraph, it states "Due to the nature of the release (produced water)....." It then goes on to indicate hydrocarbons will only be tested for in the first two feet, and if it comes back below RRAL, no further testing for hydrocarbon will be done. The C-141 reported 27 bbls oil & 110 bbls PW released, with only 1 bbl oil recovered. If the first two feet show little to no hydrocarbon impact, OCD would want to know what happened to the 26 bbls of oil that was unrecovered. Pretty much the same for chloride testing. If it cleans up within 4', OCD would likely request a sample be obtained for lab analysis of the produced water, at a minimum.

Sorry for any inconvenience, but I can't approve this the way it is.

Mike Bratcher

NMOCD District 2

811 South First Street

Artesia, NM 88210

From: Chase Settle [mailto:Chase_Settle@eogresources.com]

Sent: Monday, October 23, 2017 2:36 PM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: Bob Asher <Bob_Asher@eogresources.com>

Subject: Kleeman PD Battery Characterization Plan 2RP-4422

Please find attached the Characterization Plan for the below listed location.

Kleeman PD Battery
30-015-00253
Section 26, T18S-R26E
Eddy County, New Mexico
2RP-4422

Thank you,

Chase Settle, M.S.

Rep Safety & Environmental II

EOG Resources

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