

EOG Y Resources, Inc.

Characterization Plan

Rio Pecos GB Com #1
30-015-21889
Section 29, T18S-R27E
Eddy County, New Mexico
March 29, 2018

2RP-4580



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Figure 2: Site Map with Vertical Sample Point(s)

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I. Location

From the intersection of US 285 north turn east toward Dayton road, turn right at the 1st cross street onto E Dayton road, turn right onto N Lake Road then left on Dayton road. In 1.9 miles turn left then right, destination will be on the right.

II. Background

On January 5, 2018, EOG Y Resources, Inc. submitted to the NMOCD District II office a Form C-141 for the release of 0.5 B/O & 12 B/PW with 0.5 B/O & 11 B/PW recovered. The affected area is approximately 65 feet by 5 feet, 30 feet by 5', and 25' by 5' within the primary berm of the battery. The release was caused by the failure of a ball valve on the fiberglass produced water tank on the load line and broke causing a release. A vacuum truck was called to recover oil (100%) and produced water (92%). A backhoe was dispatched to excavate impacted soils and a crew replaced the valve. Approximately two (2) feet of impacted soils were removed and disposed at an NMOCD approved facility.

III. Surface and Ground Water

Area surface geology is Paleozoic Permian. Based on information from the New Mexico Office of the State Engineer (NMOSE) database and United States Geological Survey National Water Information System (USGS) regarding this location (Section 29, T18S-R27E), depth to groundwater is approximately 123 feet and as follows: NMOSE – RA04211, 100' & NMOSE – RA05664, 145'. The depth to groundwater is approximately 123', per NMOSE groundwater levels. **Based on this information the Site Ranking is a Zero (0).** Watercourses in the area are dry except for infrequent flows in response to major precipitation events, with the nearest body of surface water being Brantley Lake at 8.4 miles away.

IV. NMOCD Ranking Criteria

The ranking for this site is zero (0) based on the following:

Depth to ground water > 100'
Wellhead Protection Area > 1000'

Distance to surface water body > 1000'

Based on the ranking criteria, the NMOCD established RRALs for this site are:

Benzene 10 ppm BTEX 50 ppm TPH 5,000 ppm

Chlorides No established RRAL

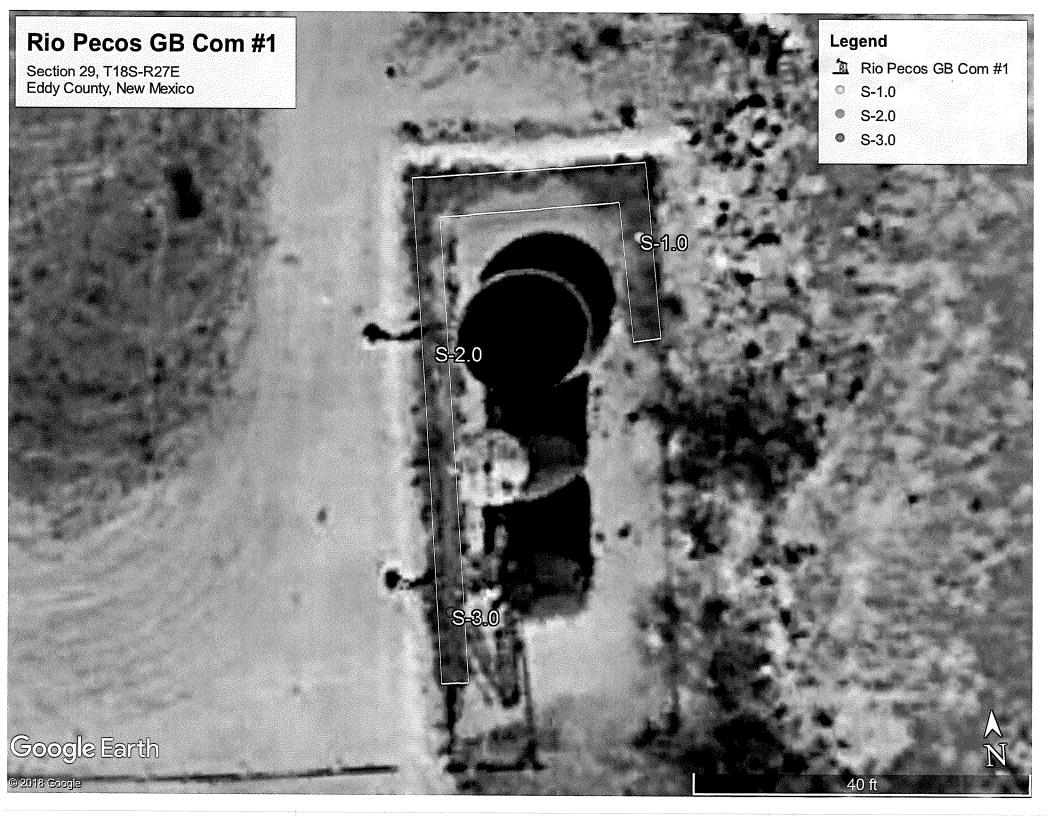




Figure 2

Vertical/Horizontal Sample Point(s)







Photos



















Appendix A
NMOSE Well Log



New Mexico Office of the State Engineer Point of Diversion Summary

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

Well Tag

POD Number

Q64 Q16 Q4 Sec Tws Rng

X

RA 04211

3 1 28 18S 27E

566512 3620562*

P

Driller License: 318

Driller Company: WESTERN PUMP & SUPPLY

Driller Name:

Drill Start Date: 05/23/1960

Drill Finish Date:

05/24/1960

Plug Date:

Log File Date:

05/24/1960

PCW Rcv Date:

Depth Well:

Source:

Shallow

Pump Type: Casing Size:

7.00

Pipe Discharge Size:

120 feet

Depth Water:

Estimated Yield:

100 feet

Water Bearing Stratifications:

Top Bottom Description

110

120 Limestone/Dolomite/Chalk

Casing Perforations:

Top Bottom

102

120

*UTM location was derived from PLSS - see Help



New Mexico Office of the State Engineer **Point of Diversion Summary**

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

Well Tag

POD Number

Q64 Q16 Q4 Sec Tws Rng

X

RA 05664

1 33 18S 27E

566914 3618936*



Driller License:

Driller Company:

Driller Name:

C.J. TIDWELL

Drill Start Date:

Drill Finish Date:

08/19/1971

Plug Date:

Log File Date:

09/13/1971

PCW Rcv Date:

Source:

Artesian

Pump Type:

Pipe Discharge Size:

Estimated Yield:

Casing Size:

Depth Well:

Depth Water: 145 feet

*UTM location was derived from PLSS - see Help





Appedix B

Form C-141 Initial

<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240 District II 811 S. First St., 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

Form C-141 Revised April 3, 2017 Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

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

Release Notification and Corrective Action												
					OP	ERATOR						
										al Report		Final Repor
Name of Co						Contact						
EOG Y Res	ources, In	С.				Chase Settle						
Address						Telephone 1						
		ia NM 8821	.0			575-748-14						
Facility Nar						Facility Typ	oe .					
Rio Pecos C	B Com #1	l .				Well						_
Surface Ow	ner			Mineral C	wner	1			API No) <u>.</u>		
Fee				Fee			30-015-21889					
				LOCA	TIC	N OF RE	LEASE					
				h/South Line				West Line County				
С	29	18S	27E	660	No	orth	1980	W	Vest Eddy			
Latitude 32.7242203 Longitude -104.302948 NAD83												
				NAT	URI	E OF REL	EASE		-			
Type of Rele							ume of Release Volume Recovered					
Oil & Produc						0.5 B/O &			0.5 B/O & 11 B/PW			
Source of Rei Ball valve on							Date and Hour of Occurrence Date and Hour of Discovery 1/5/2019, 2:20 PM					
		Riven?				1/5/2018; 2:30 PM 1/5/2018; 3:00 PM If YES, To Whom?						
Was Immediate Notice Given? ☐ Yes ☐ No ☒ Not Required					quirec							
By Whom?						Date and Hour						
N/A						N/A						
Was a Watercourse Reached? ☐ Yes ☒ No						If YES, Volume Impacting the Watercourse.						
If a Watercourse was Impacted, Describe Fully.* N/A												
Describe Cause of Problem and Remedial Action Taken.*												
A ball valve on the fiberglass produced water tank on the load line froze and broke causing the release. A vacuum truck was called to recover oil (100%)												
and produced water (92%). A backhoe was dispatched to excavate impacted soils and a crew replaced the valve.												
Describe Are	Affected a	and Cleanun A	Action Take	n *								
Describe Area Affected and Cleanup Action Taken.* The impacted area is approximately 65' X 5', 30' X 5' & 25' X 5'within the primary berm of the battery. Impacted soils have been removed												
and taken to an NMOCD approved facility. A Characterization plan will be submitted to the NMOCD. Vertical and horizontal delineation samples will be												
taken and analysis ran for TPH & BTEX (chlorides for documentation). Based off of analytical results for TPH & BTEX for the RRAL's and the site												
ranking of 0, if the analytical results are above the RRAL's a work plan will be submitted to the NMOCD, if the analytical results are below the RRAL's a												
closure report and Final C-141 will be submitted to the NMOCD. Depth to Ground Water: >100' (123', per NMOSE), Wellhead Protection Area:												
				ITE RANKING						4		
I hereby certif	y that the in	nformation gi	ven above i	s true and compl	ete to	the best of my	knowledge and u	nderstan	d that purs	uant to NM()CD r	ules 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,				01 4 0 1 11 1	Sport		c and operator of t	Coponsit	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	mphance w	ini ail	, 501101
						OIL CONSERVATION DIVISION						
Signature:												

Approved by Environmental Specialist:

Expiration Date:

Attached

Approval Date:

Phone:575-748-4217

Conditions of Approval:

E-mail Address: robert_asher@eogresources.com

Printed Name: Robert Asher

Date: January 23, 2018

Title: Environmental Supervisor

^{*} Attach Additional Sheets If Necessary

NM OIL CONSERVATION

ARTESIA DISTRICT

JAN 23 2018

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

* Attach Additional Sheets If Necessary

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 April 3, 2017

Submit I Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Release Notification and Corrective Action								
0.	PERATOR							
NAB 1802538319	☐ Initial Report ☐ Final Repo							
Name of Company EOG Y Resources, Inc. 25575	Contact							
EOG Y Resources, Inc.	Chase Settle							
104 S. 4 th Street Artesia NM 88210	Telephone No.							
Facility Name	575-748-1471 Facility Type							
Rio Pecos GB Com #1	Well							
Surface Owner Mineral Owner Fee Fee								
Fee Fee	30-015-21889							
	ON OF RELEASE							
;	th/South Line Feet from the East/West Line County Iorth 1980 West Eddy							
Latitude <u>32.7242203</u>	Longitude -104.302948 NAD83							
NATUR	E OF RELEASE							
Type of Release	Volume of Release Volume Recovered							
Oil & Produced Water	0.5 B/O & 12 B/PW							
Source of Release Ball valve on load line	Date and Hour of Occurrence Date and Hour of Discovery							
Was Immediate Notice Given?	1/5/2018; 2:30 PM 1/5/2018; 3:00 PM If YES, To Whom?							
☐ Yes ☐ No ☒ Not Require								
By Whom?	Date and Hour							
N/A Was a Watercourse Reached?	N/A							
☐ Yes ⊠ No	If YES, Volume Impacting the Watercourse.							
If a Watercourse was Impacted, Describe Fully.* N/A								
Describe Cause of Problem and Remedial Action Taken.*								
A ball valve on the liberglass produced water tank on the load line froze and produced water (92%). A backhoe was dispatched to excavate impa	e and broke causing the release. A vacuum truck was called to recover oil (100%)							
and produced water (3270). A backing was dispatched to excavate impa	cted soils and a crew replaced the valve.							
Describe Area Affected and Cleanup Action Taken.*								
The impacted area is approximately 65' X 5', 30' X 5' & 25' X	5'within the primary berm of the battery. Impacted soils have been removed							
and taken to an NMOCD approved facility. A Characterization plan will taken and analysis ran for TDU & DTEX (chloridge for documentation)	be submitted to the NMOCD. Vertical and horizontal delineation samples will be							
taken and analysis ran for TPH & BTEX (chlorides for documentation). Based off of analytical results for TPH & BTEX for the RRAL's and the site ranking of 0, if the analytical results are above the RRAL's a work plan will be submitted to the NMOCD, if the analytical results are below the RRAL's a								
closure report and Final C-141 will be submitted to the NMOCD. Depth to Ground Water: >100' (123', per NMOSE), Wellhead Protection Area:								
No, Distance to Surface Water Body: >1000', SITE RANKING IS 0.								
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.								
Signature:	OIL CONSERVATION DIVISION							
	J. J. J.							
Printed Name: Robert Asher	Approved by Environmental Specialist:							
Title: Environmental Supervisor	Approval Date: 1/23/18 Expiration Date: N/A							
E-mail Address: robert_asher@eogresources.com	Conditions of Approval; Attached Attached Attached Attached							
Date: January 23, 2018 Phone: 575-748-4217	SHOUTHAUNKA I MANADO ILKAN							
Date: January 23, 2018 Phone: 575-748-4217	100 11111 01 01 01 01 01 01							

Operator/Responsible Party,

The OCD has received the form C-141 you provided on 1/23/2018 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 1/28/2019 has been assigned. Please refer to this case number in all future correspondence.

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

The responsible person shall complete <u>division-approved corrective action</u> for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District 2 office in ARTESIA on or before 2/23/2018. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.
- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.
- Nominal detection limits for field and laboratory analyses must be provided.
- Composite sampling is not generally allowed.
- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

- •Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.
- If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.
- Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.

Jim Griswold
OCD Environmental Bureau Chief
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
505-476-3465
jim.griswold@state.nm.us