



EOG Resources, Inc.
Artesia Division Office
104 S. 4th Street
Artesia, N. M. 88210

EOG Y Resources, Inc.

Characterization Plan

Junior AWW State #4H

30-015-36421

Section 17, T16S-R28E

Eddy County, New Mexico

March 20, 2018

2RP-4612

I. Location

Go east of Artesia on US Highway 82 to MM 127, continue approximately 0.5 miles County Road 214 (Barnaval Draw Road) and turn left (North). Continue north approximately 6.2 miles, the road will fork (take left fork) and continue for approximately 2.2 miles. Road will curve to the left, continue on main lease road in a west/southwest direction for approximately 3.9 miles. Turn left (south) at lease road for 0.1 miles, turn right (west) and follow the inclined road to the NE corner of the location.

II. Background

On February 12, 2018, EOG Y Resources, Inc. submitted to the NMOCD District I office a Form C-141 for the release of 1 B/O & 5 B/PW with 1 B/O & 5 B/PW recovered. The affected area is approximately 75' X 45' within the secondary containment of the production facility and was contained within the bermed and lined battery. The release was caused by the welding around a swedge on the bottom of the water leg of the heater unit rusted out. A vacuum truck was dispatched and recovered all of the released oil and produced water. A backhoe crew was dispatched and excavated the visibly impacted gravel. The impacted gravel excavated was hauled to an NMOCD approved disposal facility.

III. Surface and Ground Water

Area surface geology is Paleozoic Permian. Based on information regarding this location (Section 17, T16S-R28E), the New Mexico Office of the State Engineer (NMOSE) database depth to groundwater is follows: (NMOSE-RA 12299 POD1, 70'), the United States Geological Survey National Water Information System, is as follows: (USGS #335834104164501, 79.25' & USGS #325638104072801, 49.25'). The depth to groundwater is 50 – 99', per USGS and NMOSE groundwater level. **Based on this information the Site Ranking is a Ten (10).**

Watercourses in the area are dry except for infrequent flows in response to major precipitation events, with the nearest body of surface water being Flat Lake at 3.10 miles away.

IV. NMOCD Ranking Criteria

The ranking for this site is Ten (10) based on the following:

Depth to ground water	50-99'
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	1,000 ppm
Chlorides	No established RRAL

V. Liner Integrity Test

With the battery being bermed and lined with a 20 millimeter liner, a liner integrity test will be performed to determine if there are any leaks, tears, punctures and/or breaches. The battery will be filled with fresh water and the level gauged. After a period of three (3) hours, the water level will be gauged again, based off of the measurements, the SMA Evaporation Formula will be used to determine either liner integrity is intact where a Closure Report/Form C-141 Final Report will be submitted to the NMOCD II Office requesting closure. Or if there is abnormal water loss that would indicate a liner failure in which, VI. Sampling Procedure will be implemented.

VI. Sampling Procedure

Samples will only be collected if the liner integrity test shows a failure or breach in the liner.

Vertical delineation samples (SP-1 & SP-2) will be collected at a central sample point within the release area. Samples will be collected at 1', 2', 3', and 4' below grade surface (bgs) or when auger refusal is encountered. Due to the nature of the release (oil & produced water), the vertical delineation soil samples will be analyzed for Benzene, BTEX, TPH extended (Chlorides for documentation). All samples will be sent to a NMOCD approved laboratory for analysis.

Horizontal delineation samples will be collected at the 4 cardinal point (CP1-CP4) at what is believed to be the outer edge of the release/excavation area. Samples will be collected at 1' below grade surface (bgs) or when auger refusal is encountered. If a sample point is determined to be impacted by the release, a new sample will be collected moving out further until an area without impaction is located. Once located, samples will be taken to collaborate the impaction path to the next sample point in the sequence. Due to the nature of the release (oil & produced water), the vertical delineation soil samples will be analyzed for Benzene, BTEX, TPH extended (Chlorides for documentation). All samples will be sent to a NMOCD approved laboratory for analysis.

As a baseline for all sampling analytical data, background sample(s) will be collected up gradient from the release to the east. The point remains on the production pad in an area that has no known release impaction. This creates less damage to the SLO surface by keeping the activities on the production pad and reduces the vegetative damage that would otherwise be created by moving off of location to collect background samples in the adjoining pasture.

Latitude/Longitude Coordinates for Sample Points

SP-1	32.920836°; -104.190035°
SP-2	32.920776°; -104.189881°
CP-1	32.920856°; -104.189967°
CP-2	32.920757°; -104.189969°
CP-3	32.920796°; -104.189853°
CP-4	32.920805°; -104.190063°
Background Sample	32.920866°; -104.190620°

Figure 1

Site Map

Junior AWW State #4H

30-015-36421

Section 17, T16S-R28E

Eddy County, New Mexico

Legend

● Junior AWW State #4H

Junior AWW State #4H

Google Earth

© 2018 Google

200 ft



Figure 2

Vertical Sample Point(s)

Junior AWW State #4H

30-015-36421

Section 17, T16S-R28E

Eddy County, New Mexico

Legend

- Junior AWW State #4H
- Vertical Sample Points

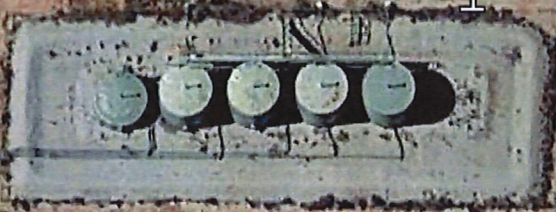


Figure 3

Horizontal Sample Point(s)

Junior AWW State #4H

30-015-36421
Section 17, T16S-R28E
Eddy County, New Mexico

Legend

- Horizontal Sample Points
- Junior AWW State #4H

Junior AWW State #4H

CP-1
CP-2
CP-3
CP-4

Figure 4

Background Sample Point(s)

Junior AWW State #4H

30-015-36421

Section 17, T16S-R28E

Eddy County, New Mexico

Legend

- Background Sample
- Junior AWW State #4H

Background Sample

Junior AWW State #4H

Photos



Geog y resources (575) 748-1471

JUNIOR "AWW" State #4-H
2130' FSL & 150' FEL - NE/SE
Sec. 17 - T 16 S - R 28 E - Unit 1
Eddy Co. New Mexico
Lse. # V-5604 - API #30-015-36421

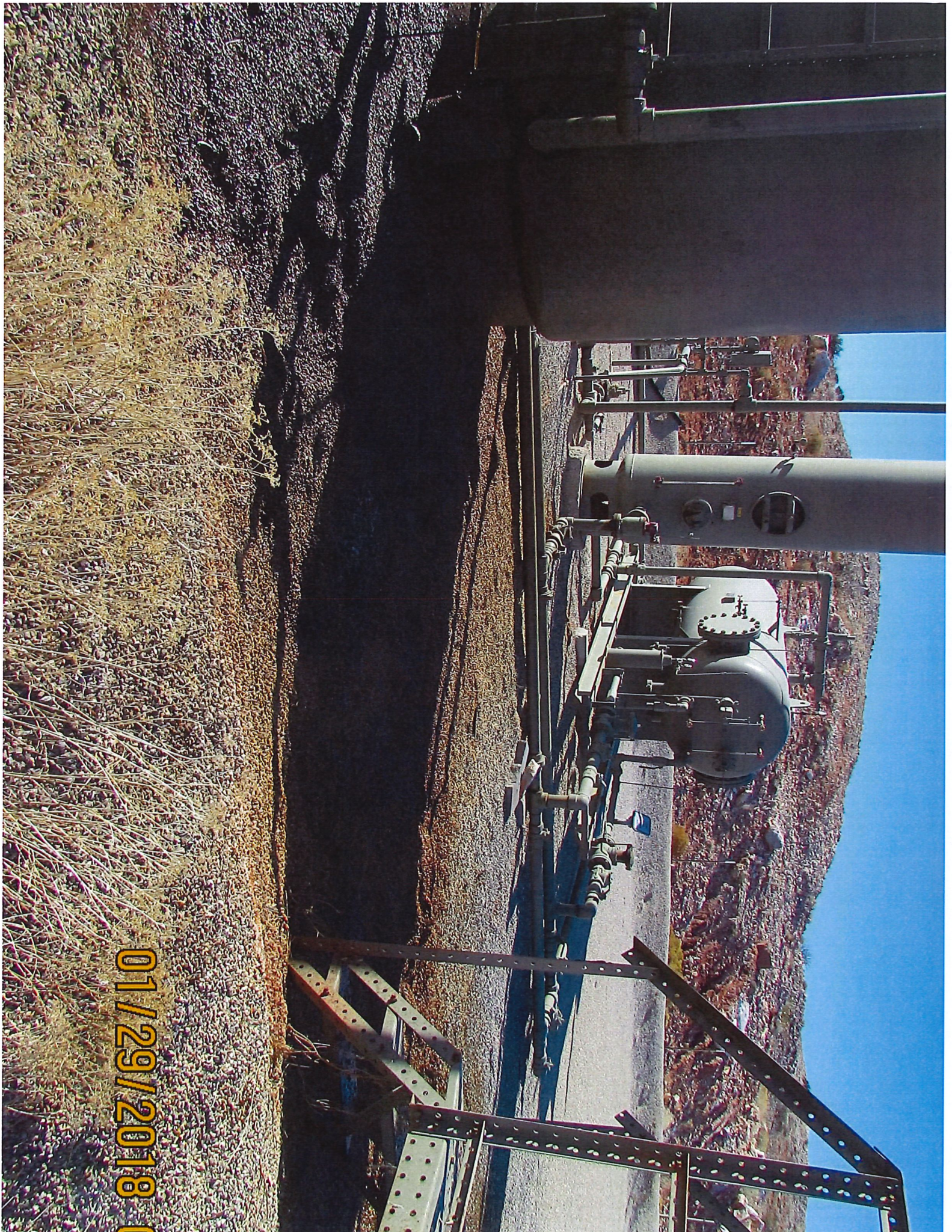
AFF # 08-233-0

01/29/2018

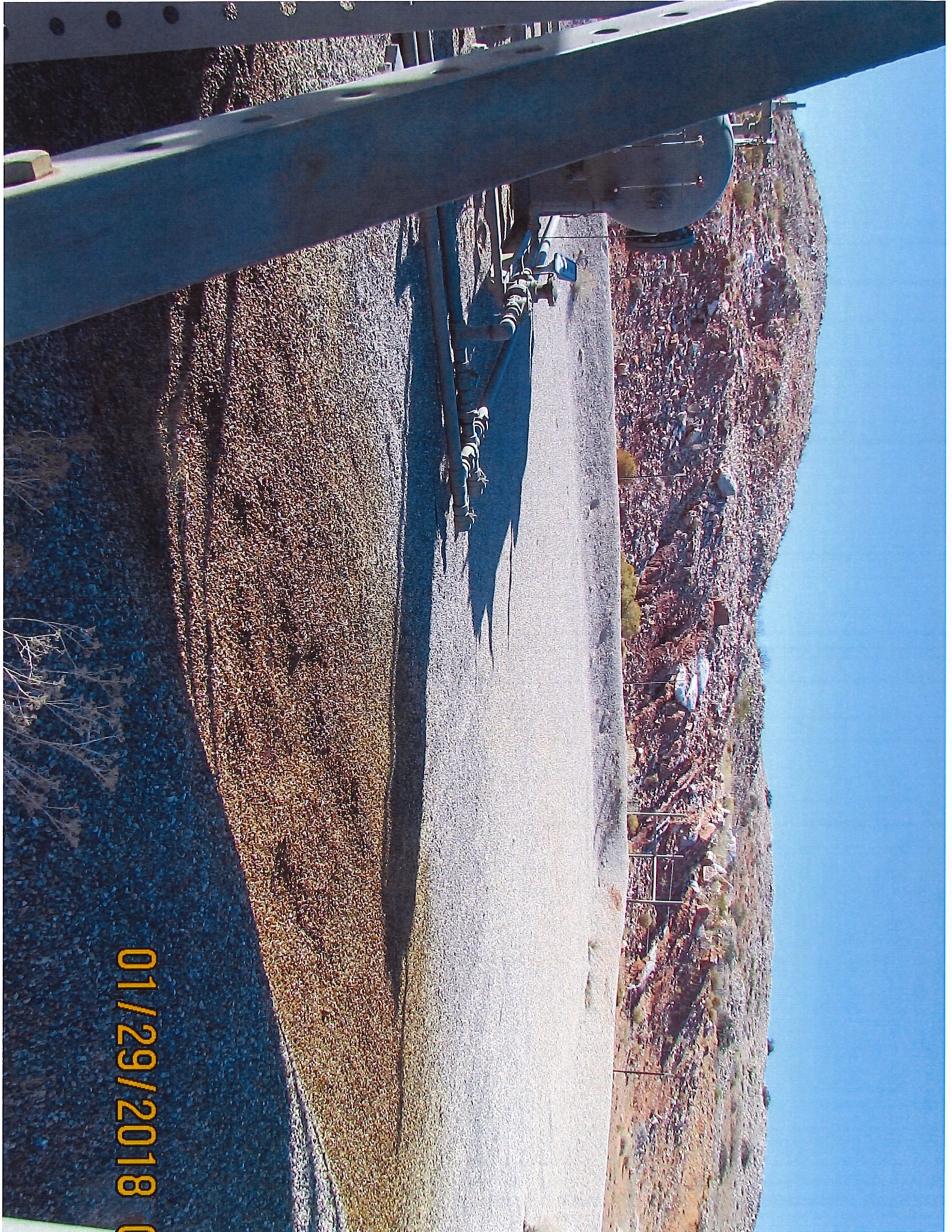
01/29/2018 0



01/29/2018 10



01/29/2018 0



Appendix A

Water Well Date Site Map

Junior AWW State #4H

30-015-36421

Section 17, T16S-R28E

Eddy County, New Mexico

Water Well Data

Site Rankings Ten (10). Depth to Groundwater: 50-99'

(Approximately 66.2', per NMOSE & USGS Groundwater Levels)

Legend

- Junior AWW State #4H
- NMOSE & USGS Water Wells

USGS 335834104164501 (DTGW @ 79.25')

Junior AWW State #4H

USGS 325638104072801 (DTGW @ 49.25')

RA 12299 POD1 (DTGW @ 70')

Google Earth

© 2013 Google

5 mi



Appendix B

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	Y
RA 12299	POD1	4 3 3	25	16S	28E	580832	3639215

Driller License: 1058

Driller Company: KEY'S DRILLING & PUMP SERVICE

Driller Name: CLINTON KEY

Drill Start Date: 09/21/2015

Drill Finish Date: 09/23/2015

Plug Date:

Log File Date: 10/07/2015

PCW Rcv Date:

Source: Shallow

Pump Type:

Pipe Discharge Size:

Estimated Yield: 30 GPM

Casing Size: 4.50

Depth Well: 115 feet

Depth Water: 70 feet

Water Bearing Stratifications:

Top Bottom Description

70	80	Sandstone/Gravel/Conglomerate
80	90	Shale/Mudstone/Siltstone
105	115	Other/Unknown

Casing Perforations:

Top Bottom

95	115
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Appendix C

USGS Groundwater Level Information



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National Water Information System: Web Interface

[USGS Water Resources](#)

Data Category:

Site Information ▼

Geographic Area:

United States ▼

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USGS 335834104164501 15S.27E.31.11442

Available data for this site

SUMMARY OF ALL AVAILABLE DATA ▼

GO

Well Site

DESCRIPTION:

Latitude 32°58'34", Longitude 104°16'45" NAD27
Chaves County, New Mexico , Hydrologic Unit 13060007
Well depth: not determined.
Land surface altitude: 3,429 feet above NGVD29.
Well completed in "Artesia Group" (313ARTS) local aquifer

AVAILABLE DATA:

Data Type	Begin Date	End Date	Count
Field groundwater-level measurements	1986-06-01	1994-04-28	4

OPERATION:

Record for this site is maintained by the USGS New Mexico Water Science Center
Email questions about this site to [New Mexico Water Science Center Water-Data Inquiries](#)

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Title: NWIS Site Information for USA: Site Inventory

URL: <https://waterdata.usgs.gov/nwis/inventory?>



Page Contact Information: [New Mexico Water Data Support Team](#)

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National Water Information System: Web Interface

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Data Category:

Groundwater



Geographic Area:

United States



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Groundwater levels for the Nation

Search Results -- 1 sites found

site_no list =

- 335834104164501

Minimum number of levels = 1

[Save file of selected sites](#) to local disk for future upload

USGS 335834104164501 15S.27E.31.11442

Available data for this site

Groundwater: Field measurements



GO

Chaves County, New Mexico

Hydrologic Unit Code 13060007

Latitude 32°58'34", Longitude 104°16'45" NAD27

Land-surface elevation 3,429 feet above NGVD29

This well is completed in the Artesia Group (313ARTS) local aquifer.

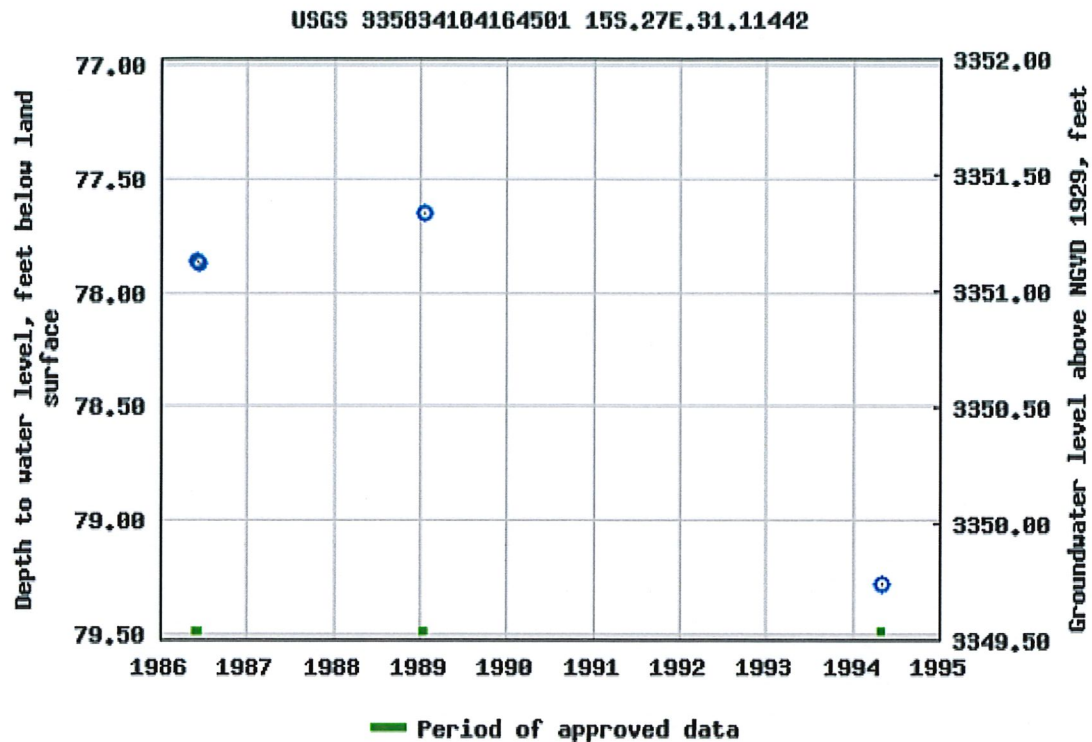
Output formats

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[Graph of data](#)

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Breaks in the plot represent a gap of at least one year between field measurements.

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Title: Groundwater for USA: Water Levels

URL: <https://nwis.waterdata.usgs.gov/nwis/gwlevels?>



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1.05 0.91 nadww01



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National Water Information System: Web Interface

[USGS Water Resources](#)

Data Category:

Site Information ▼

Geographic Area:

United States ▼

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USGS 325638104072801 16S.28E.12.22132

Available data for this site

SUMMARY OF ALL AVAILABLE DATA ▼

GO

Well Site

DESCRIPTION:

Latitude 32°56'38", Longitude 104°07'28" NAD27
Eddy County, New Mexico , Hydrologic Unit 13060011
Well depth: 54 feet
Land surface altitude: 3,580 feet above NGVD29.
Well completed in "Alluvium, Bolson Deposits and Other Surface
Deposits" (110AVMB) local aquifer

AVAILABLE DATA:

Data Type	Begin Date	End Date	Count
Field groundwater-level measurements	1994-03-09	2009-01-13	7

OPERATION:

Record for this site is maintained by the USGS New Mexico Water Science Center
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Title: NWIS Site Information for USA: Site Inventory

URL: <https://waterdata.usgs.gov/nwis/inventory?>



Page Contact Information: [New Mexico Water Data Support Team](#)

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0.29 0.27 caww01



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National Water Information System: Web Interface

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Data Category:

Groundwater



Geographic Area:

United States



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Groundwater levels for the Nation

Search Results -- 1 sites found

site_no list =

- 325638104072801

Minimum number of levels = 1

[Save file of selected sites](#) to local disk for future upload

USGS 325638104072801 16S.28E.12.22132

Available data for this site

Groundwater: Field measurements



GO

Eddy County, New Mexico

Hydrologic Unit Code 13060011

Latitude 32°56'38", Longitude 104°07'28" NAD27

Land-surface elevation 3,580 feet above NGVD29

The depth of the well is 54 feet below land surface.

This well is completed in the Alluvium, Bolson Deposits and Other Surface Deposits (110AVMB) local aquifer.

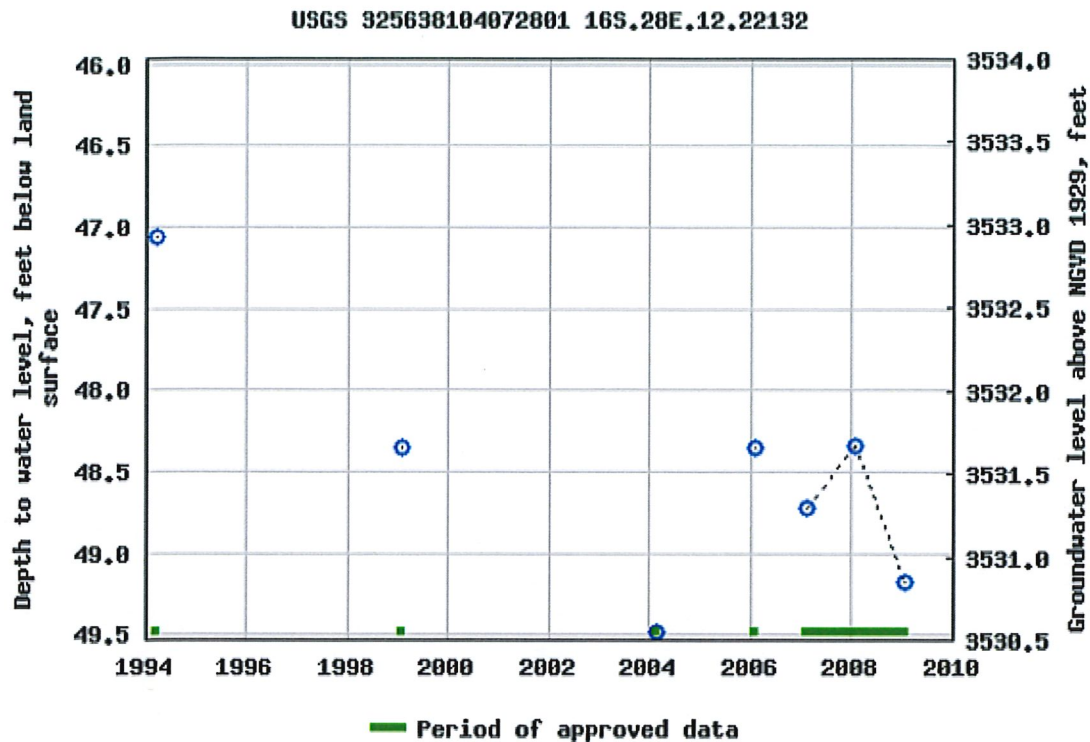
Output formats

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Title: Groundwater for USA: Water Levels

URL: <https://nwis.waterdata.usgs.gov/nwis/gwlevels?>



Page Contact Information: [USGS Water Data Support Team](#)

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1.07 0.92 nadww01

Appendix D

Form C-141 Initial

NM OIL CONSERVATION

ARTESIA DISTRICT

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

State of New Mexico
Energy Minerals and Natural Resources

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

FEB 12 2018

Form C-141
Revised April 3, 2017

Submit 1 Copy to appropriate District Office in
accordance with 19.15.29 NMAC.

RECEIVED

Release Notification and Corrective Action

OPERATOR

NAB1804435837

☒ Initial Report ☐ Final Report

Name of Company EOG Y Resources, Inc.	Contact Robert Asher
Address 104 S. 4 th Street Artesia NM 88210	Telephone No. 575-748-1471
Facility Name Junior AWW State #4H	Facility Type Battery

Surface Owner State Private	Mineral Owner State	API No. 30-015-36421
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LOCATION OF RELEASE

Unit Letter I	Section 17	Township 16S	Range 28E	Feet from the 2130	North/South Line South	Feet from the 150	East/West Line East	County Eddy
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Latitude 32.92112 Longitude -104.18951 NAD83

NATURE OF RELEASE

Type of Release Crude Oil/Produced Water	Volume of Release 1 B/O & 5 B/PW	Volume Recovered 1 B/O & 5 B/PW
Source of Release Heater Treater	Date and Hour of Occurrence 1/25/2018; PM	Date and Hour of Discovery 1/26/2018; 3:30 PM
Was Immediate Notice Given? ☐ Yes ☐ No ☒ Not Required	If YES, To Whom? N/A	
By Whom? N/A	Date and Hour 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.*

Welding around the swedge on the bottom water leg of heater rusted out. Vacuum truck and roustabout crew called.

Describe Area Affected and Cleanup Action Taken.*

The impacted area was approximately 75' X 45' within the secondary containment of the production pad (this containment is bermed with a 20 mil liner). Vacuum truck recovered all oil and produced water released. A liner integrity test will be conducted, if results are within the allowable limits to affirm integrity a Final Report, C-141 will be submitted to the NMOCD requesting closure. If the results indicate integrity failure a characterization plan will be submitted to the NMOCD. Depth to Ground Water: 50-99' (70' per NMOSE & 79.25' per USGS), Wellhead Protection Area: No, Distance to Surface Water Body: >1000', SITE RANKING IS 10.

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 Accepted for record only	
Printed Name: Robert Asher	Approved by Environmental Specialist:	
Title: Environmental Supervisor	Approval Date: 2/13/18	Expiration Date: N/A
E-mail Address: robert_asher@eogresources.com	Conditions of Approval: see attached	Attached ☒ JRP 4/11/18
Date: February 12, 2018	Phone: 575-748-4217	

* Attach Additional Sheets If Necessary

site assessments on initial
C-141 will not be accepted.

Operator/Responsible Party,

The OCD has received the form C-141 you provided on **2/12/18** regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 2RP-4612 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 division-approved corrective action 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 II office in Artesia on or before 3/12/18. 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

Weaver, Crystal, EMNRD

From: Yvette Moore <Yvette_Moore@eogresources.com>
Sent: Monday, February 12, 2018 10:30 AM
To: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD
Cc: Bob Asher; Chase Settle
Subject: C-141 Initial Junior AWW State #4H
Attachments: Form C-141 Initial (Junior AWW State #4H).pdf

Please find the attached C-141 Initial for the location listed below:

Junior AWW State #4H
30-015-36421
2130' FSL & 150' FEL
Sec 17-16S-28E
Eddy County, New Mexico

Thanks,



Yvette Moore

Rep Safety & Environmental II
Safety & Environmental Department
Artesia Division
(575)748-4223
yvette_moore@eogresources.com