

From: [Yu, Olivia, EMNRD](#)
To: [Bob Asher](#); [Billings, Bradford, EMNRD](#); [Mann, Ryan](#)
Cc: [Katie Jamison](#); [Hernandez, Christina, EMNRD](#)
Subject: RE: Remediation Work Plan (Big Sky ABY State #1, Part 4)
Date: Thursday, July 26, 2018 8:25:00 AM
Attachments: image001.png

Good morning Mr. Asher:

In the interest of proceeding to resolution of 1RP-4792, NMOCD will agree to the proposed remediation of 4 ft. excavation on the condition that horizontal delineation (sidewalls) and vertical delineation (greater than 4 ft. bgs) will be completed. Site ranking is 20 with corresponding RRALs.

All delineation/confirmation samples must be tested for Benzene, BTEX, TPH extended, and chlorides. Confirmation/additional delineation sample locations must be clearly visible on a scaled map. Permissible chloride limit is 600 mg/kg. Soil samples must have chloride levels tested as the release source was a heater treater and the initial C-141 stated that the release was exclusively produced water.

The question regarding the vertical and horizontal sample locations being switched is because of the discrepancy between the tabulated data and the headings for Figure 2 and Figure 3. The document, sent on June 15, 2018, still has Figure 2 labelled as for vertical sample locations (CP1-4) at the lateral extent of the release area, while Figure 3 refers to horizontal sample locations (S1-5), marked presumably of representative pooling locations.

Again, this email did not include NMSLO. Please be advised that the Responsible Operator is accountable for any failure or delay in like approval from NMSLO regarding the proposed remediation or reclamation.

Thanks,
Olivia

From: Bob Asher <Bob_Asher@eogresources.com>
Sent: Friday, June 15, 2018 10:00 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Cc: Katie Jamison <Katie_Jamison@eogresources.com>
Subject: FW: Remediation Work Plan (Big Sky ABY State #1, Part 4)

Ms. Yu,

Concerning your note on the caliche layer encountered, as stated in the remediation work plan, "The area consists of soils that are loam based topsoil with deeper layers consisting of a cemented hardpan caliche layer in the subsurface that is impenetrable". This caliche is a hardened natural sedimentary rock and we were unable to collect deeper delineation samples or clean samples by means of a backhoe tractor. EOG Resources would like to request that the NMOCD allow EOG per the scope of work to excavate four (4) feet of impacted soils and take

those impacted soils to an approved NMOCD disposal facility. Once that work is completed, EOG will request a sampling event with the NMOCD and collect samples from that cemented hardpan caliche layer, if at all possible. Those samples will be analyzed for BTEX, GRO, DRO and extended DRO since the release consisted of oil only. If sample results are below RRAL's for the site ranking, the scope of work will be completed as outline in the remediation plan.

TPH Extended are complete in the attached document.

Verification of horizontal and vertical samples completed and not reversed.

Plat/map updated, document attached.

As stated in the March 21, 2018 Remediation Plan, "With the well-being plugged and the site abandoned after this release occurred the site will be reclaimed per State Land Office rules and reseeded per the SLO's recommended seed and seed rate." EOG Resources was not anticipating that the infrastructure would be impeding complete release characterization or subsequent remedial activities.

Thank you,

Robert C. "Bob" Asher

Environmental Supervisor

Safety & Environmental Department

EOG Resources, Inc.

Artesia Division

EOG Safety Begins With YOUR Safety



From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]

Sent: Tuesday, April 17, 2018 3:41 PM

To: Bob Asher <Bob_Asher@eogresources.com>; rmann@slo.state.nm.us

Cc: Yvette Moore <Yvette_Moore@eogresources.com>

Subject: RE: Remediation Work Plan (Big Sky ABY State #1, Part 4)

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

Mr. Asher:

As mentioned before, please remember to include all corresponding agencies in all submittals and communications. The release for 1RP-4792 occurred on State surface and mineral ownership.

Several concerns regarding the report for 1RP-4792:

1. Please be advised that a caliche layer is not an acceptable rationale for incompleteness of vertical delineation.
2. There is a discrepancy between the RRALs indicated on page 3 and beneath the tables. As stated in the December 8, 2017 email, there is a playa within 200 ft. of the release location. Therefore, the impacted area does not have complete TPH extended nor chlorides characterized at depth.

3. Verification of horizontal and vertical sample location IDs required. As presented, Figure 2 with CP-1 to CP-4 are vertical sample locations, while Figure 3 with S-1 to S-5 are horizontal sample locations. Is this reversed?
4. Where were SP3 and SP4 sampled? They were not marked on the map, but the GPS coordinates are the same as the samples taken on August 15, 2017.

Since aerial imagery from January 2018 showed the facility as dismantled and no longer in place, NMOCD does not anticipate infrastructure impeding complete release characterization or subsequent remedial activities.

NMSLO may have additional stipulations or conditions.

Thanks,
Olivia

From: Bob Asher <Bob_Asher@eogresources.com>
Sent: Thursday, March 22, 2018 6:21 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Yvette Moore <Yvette_Moore@eogresources.com>
Subject: Remediation Work Plan (Big Sky ABY State #1, Part 4)

Thank you,

Robert C. “Bob” Asher
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