

From: [Yu, Olivia, EMNRD](#)
To: [Bob Asher](#); [Billings, Bradford, EMNRD](#)
Cc: [Katie Jamison](#)
Subject: RE: Judson AUU State Com #2 (Remediation Plan)
Date: Thursday, July 26, 2018 4:09:00 PM
Attachments: image001.png

Mr. Asher:

In the interest of moving 1RP-4826 towards resolution, NMOCD will agree to the proposed remediation of 4 ft. excavation on the condition that delineation (horizontal and vertical) be completed with the site ranking of 20 and modified RRALs. Please note that the release type was reported as condensate, not oil. Laboratory analyses of delineation and confirmation bottom and sidewall samples must be tested for Benzene, BTEX, TPH extended, and chlorides. Permissible chloride levels are 600 mg/kg.

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: Judson AUU State Com #2 (Remediation Plan)

Ms. Yu,

Thank you for the note concerning correspondence to other agencies. 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.

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: Thursday, April 19, 2018 9:46 AM

To: Bob Asher <Bob_Asher@eogresources.com>

Cc: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>

Subject: RE: Judson AUU State Com #2 (Remediation Plan)

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

Mr. Asher:

Please be advised that the

- Release area is in core LPC habitat. BLM timing stipulations are in effect.
- Depth to groundwater was assessed incorrectly. There are other USGS wells (attached) that are closer and have more recent data than the ones identified in the report. Also, the one with the most recent data is hydrologically upgradient from the release location. Depth to groundwater is estimated to be approximately 50 ft. bgs.
- A caliche layer is not an acceptable rationale for incompleteness of vertical delineation.

Based on the revised RRALs, release characterization (vertically and horizontally) is not complete for 1RP-4826. Furthermore, as indicated in the email dated December 29, 2017, a proportion of the samples need laboratory analyses of chlorides for verification. This report does not have any data related to chlorides.

Thanks,

Olivia

From: Bob Asher <Bob_Asher@eogresources.com>

Sent: Tuesday, March 27, 2018 3:57 PM

To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

Subject: Judson AUU State Com #2 (Remediation Plan)

Thank you,

Robert C. "Bob" Asher

Environmental Supervisor

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