

From: [Yu, Olivia, EMNRD](#)
To: ["Bob Asher"; Katie Parker](#)
Cc: [Oberding, Tomas, EMNRD](#); [Billings, Bradford, EMNRD](#); agroves@slo.state.nm.us
Subject: RE: Form C-141, Initial/Final Report (Woodstock State Unit #1)
Date: Friday, August 18, 2017 8:08:00 AM
Attachments: image001.png

Good morning Mr. Asher:

Thank you for the scaled map with the release area demarcated for 1RP-4777. The pins marked the locations of the sample locations for delineation. Please clarify whether these pins also mark the locations where confirmation samples of sidewalls and bottom will be taken.

Thanks,
Olivia

From: Bob Asher [mailto:Bob_Asher@eogresources.com]
Sent: Wednesday, August 16, 2017 11:29 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Katie Parker <Katie_Parker@eogresources.com>
Cc: Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; agroves@slo.state.nm.us
Subject: RE: Form C-141, Initial/Final Report (Woodstock State Unit #1)

Attached is a to scale map with the release area (outlined in blue) and the confirmation sample locations.

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: Friday, August 11, 2017 8:07 AM
To: Katie Parker <Katie_Parker@eogresources.com>
Cc: Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Bob Asher <Bob_Asher@eogresources.com>; agroves@slo.state.nm.us
Subject: RE: Form C-141, Initial/Final Report (Woodstock State Unit #1)

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

Ms. Parker:

Thank you for the explanation below regarding 1RP-4777 and EOG's internal policy.

Nevertheless, NMOCD requires at least two notifications to NMOCD: 1) notice of release with immediate corrective actions noted and 2) verification that the release has not "endanger public health or the environment." Under NMAC 19.15.29.11, NMOCD requires that the Responsible Operator submit a remediation plan for NMOCD approval and then, proceed to "complete division-approved correction action". Thus, delineation and remediation are to be completed as per NMOCD guidelines, with sufficient documentation for evaluation (i.e., photo documentation, map of sample locations and impacted area, confirmation samples). As is often the case, the individual reporting the release may not have the resources or knowledge to evaluate the release to comply with NMOCD regulations.

RE: Chevron Water Trend map. Thank you for utilizing the groundwater resources available. The request is for verification of the discrepancy of the two sources. In general, the estimated depth to groundwater difference between the NMOSE data and Chevron water trend map is not so disparate. NMOCD determines at depth of groundwater using multiple sources, including NMOSE and USGS databases and the Chevron water trend map. While the limitation of the map is acknowledged, currently it is

still an acceptable groundwater resource in conjunction with other data.

In summary, although the Responsible Operator's approach is recognized as a method to address releases in a timely manner, NMOCD requires data for confirmation of remediation. For Woodstock State Unit #1 (1RP-4777), the data presented along with the initial C-141 is adequate for delineation. For backfill approval and closure, at a minimum, NMOCD requires 1) a scaled map with the release area and confirmation sample locations demarcated; 2) a table with depth of excavation and laboratory analytical data from bottom and sidewall samples; and 3) photo documentation of the release location, before and after release.

Additional questions pertaining to how the C-141 form is utilized or recommendations to streamline notification, delineation, and remediation processes for both the Responsible Operator and for NMOCD can be discussed at the August 24, 2017 meeting in Artesia.

Thanks,
Olivia

From: Katie Parker [mailto:Katie_Parker@eogresources.com]

Sent: Thursday, August 10, 2017 8:10 AM

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

Cc: Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Bob Asher <Bob_Asher@eogresources.com>; agroves@slo.state.nm.us

Subject: FW: Form C-141, Initial/Final Report (Woodstock State Unit #1)

Dear Ms. Yu,

I'm responding to your email correspondence with Bob Asher on 1RP-4777.

We acknowledge that we inadvertently omitted to notify within the specified time for this release and we do apologize for this omission. We strive very hard to diligently meet all timing requirements and will continue to do so in the future.

In regards to submitting an Initial/Final C-141, this has been routine procedure for many years on releases that are immediately addressed and all contaminated soils are removed. We submit a final C-141 in order to notify NMOCD that the entire release area has been addressed and are therefore requesting closure. I hope this explanation clarifies why we submitted an Initial/Final C-141 form, but if the procedure is still in question, please let me know and we can discuss it further. We confirm that we understand that NMOCD has sole authority to close a release.

In reference to your questions regarding sampling depth, you are correct in understanding that 1' of soil was removed and disposed. The samples that were collected after soil was removed were taken at 1' and 2' below ground surface, making them at a depth of 2' and 3' from ground level. We do not propose any remedial activity other than backfilling with clean soil since the highest chlorides tested in the four cardinal points was 70 mg/kg.

As for the determination of GW data, I have been told in several meetings over the past few months with the Environmental Bureau in Santa Fe, that operators could not use the Chevron Trend Map when NMOSE and other data was available. However, even if we use the Trend Map and change the site ranking to a 10, we do not believe it changes the situation since chlorides were tested at 70 mg/kg and below.

Based on the answers I have provided, we request closure of this release. Please let me know if you have any additional questions and we will answer them for you.

Best regards,

Katie Parker

Safety & Environmental Manager
EOG Resources, Inc – Artesia NM Division
105 S. Fourth Street
Artesia, NM 88210

Cell: 575-513-9915



From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Friday, August 4, 2017 4:01 PM
To: Bob Asher <Bob_Asher@eogresources.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Cc: NMSLO (Hobbs/Amber Groves) <agroves@slo.state.nm.us>
Subject: RE: Form C-141, Initial/Final Report (Woodstock State Unit #1)

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

Dear Mr. Asher:

While your timely delineation response to a release is appreciated, please be advised:

1. Under NMAC 19.15.29, an initial C-141 must be submitted within 15 days of the release. NMOCD was not informed verbally or in written format of this release, which occurred on June 29, 2017, until August 1, 2017.
2. NMOCD determined the final status of a release, not the Operator. Submission of Initial-Final C141s will be marked as Initial only.
3. Chloride analysis is not for documentation only. The release is 2 bbls of produced water with none recovered.

The 1RP for this incident

4777	8/4/2017	A	EOG Y Resources	Woodstock State Unit #1	30-025- 30700	9S-33E-5P	6/29/2017
-------------	----------	---	--------------------	-------------------------	------------------	-----------	-----------

- Please submit a scaled map with the release area demarcated around the wellhead.
- Chevron Water trend map suggests that GW is shallow for the northern part of this Township-Range. Also, there is a water well in the next Section 6 of 9S-33E. Please verify in order to account for the wide divergence between NMOSE data and the water trend map.
- Based on soil sampling date (July 18, 2017) after excavation of impacted soil on July 5, 2017, samples were taken after 1 ft. of soil was removed. Is this correct? The table states that the first depth of sampling was at 12" or 24" bgs. If this is the case, what is the proposed remedial activity?
- Georeferenced, time-stamped photo documentation is strongly recommended along with a revised map.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

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: Bob Asher [mailto:Bob_Asher@eogresources.com]
Sent: Tuesday, August 1, 2017 4:00 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: NMSLO (Hobbs/Amber Groves) <agroves@slo.state.nm.us>
Subject: Form C-141, Initial/Final Report (Woodstock State Unit #1)

Thank you,

Robert C. “Bob” Asher

Environmental Supervisor

Safety & Environmental Department

EOG Resources, Inc.

Artesia Division

Artesia, NM 88210

575-748-4217 (Office)

575-365-4021 (Cell)

EOG Safety Begins With YOUR Safety



Untitled Map

Write a description for your map.

Legend

Feature 1

SC-1.0; SC-2.0; SC-3.0

WOODSTOCK 11:33:46 AM

