

MAR 15 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

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

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

Release Notification and Corrective Action

DAB 1811521351

OPERATOR Initial Report Final Report

Name of Company: EOG Y Resources, Inc. <i>25575</i>	Contact: Chase Settle
Address: 104 S. 4 th Street Artesia NM 88210	Telephone No.: 575-748-1471
Facility Name: Irish Hills <i>Yeso NM Fed. #1</i>	Facility Type: ROW/Pipeline

Surface Owner: Private	Mineral Owner: Federal	API No. 30-015-23326
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LOCATION OF RELEASE

API provided IS for tracking purposes only since it is a plugged well.

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
C	7	19S	25E					Eddy

Latitude 32°40'56.12"N Longitude 104°31'29.44"W

NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: Unknown	Volume Recovered: 0 BBL
Source of Release: Pipeline	Date and Hour of Occurrence: Unknown	Date and Hour of Discovery: 3/18/2015
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*
An unknown amount of produced water was released from a buried pipeline, which was later exposed due to flooding. The pipeline has since been repaired.

Describe Area Affected and Cleanup Action Taken.*
The impacted area was approximately 20 feet by 600 feet in the pasture. With approval from area utilities owners via 811 and NMOCD, vertical and horizontal delineation samples will be taken, and analysis ran for TPH & BTEX (chlorides for documentation). If initial analytical results for TPH & BTEX are under RRAL's (site ranking is 0) a Final Report, C-141 will be submitted to the OCD requesting closure. If the analytical results are above the RRAL's, a work plan will be submitted to the OCD.

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: <i>Chase Settle</i>	OIL CONSERVATION DIVISION	
Printed Name: Chase Settle	Signed By <i>Mike Brumley</i> Approved by Environmental Specialist.	
Title: Rep Safety & Environmental II	Approval Date: <i>4/19/18</i>	Expiration Date: <i>N/A</i>
E-mail Address: chase_settle@eogresources.com	Conditions of Approval: <i>See attached</i>	Attached: <i>TRP-4710</i>
Date: March 14, 2018 Phone: 575-748-4171		

* Attach Additional Sheets If Necessary

4/19/18 AB

LATE Entry by OCD

Operator/Responsible Party,

The OCD has received the form C-141 you provided on **3/15/18** regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number ARP-4710 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 4/15/18. 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: Weaver, Crystal, EMNRD
Sent: Tuesday, April 24, 2018 12:28 PM
To: 'Melodie Sanjari'; Bratcher, Mike, EMNRD
Cc: Tucker, Shelly; Heather Patterson; Chase Settle; Austin Weyant
Subject: RE: Irish Hills Work Plan & Initial C141

Well I just checked in with Mike on this one and he said lets go ahead and use the plugged well API even though it doesn't make sense it can be used for tracking purposes if I document that on the actual C-141 before it gets processed. So I just went ahead and did that.

So let's move this one forward and you can keep referring to the original API number that you all used in the first place.

Thanks,

Crystal Weaver
Environmental Specialist
OCD – Artesia District II
811 S. 1st Street
Artesia, NM 88210
Office: 575-748-1283 ext. 101
Cell: 575-840-5963
Fax: 575-748-9720

From: Melodie Sanjari <melodie.sanjari@soudermiller.com>
Sent: Tuesday, April 24, 2018 8:27 AM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Tucker, Shelly <stucker@blm.gov>; Heather Patterson <heather.patterson@soudermiller.com>; Chase Settle <Chase_Settle@eogresources.com>; Austin Weyant <austin.veyant@soudermiller.com>
Subject: RE: Irish Hills Work Plan & Initial C141

Good Morning All,

This line carries produced water from the Irish Wells to the SWD. If the API you provided (30-015-23256) was the only one that is still active, then we should tie this incident to that active well. We apologize, we didn't realize all other Irish Hills wells were plugged.

Best,

Melodie Sanjari

From: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Sent: Friday, April 20, 2018 4:18 PM
To: Melodie Sanjari <melodie.sanjari@soudermiller.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>

Cc: Tucker, Shelly <stucker@blm.gov>; Heather Patterson <heather.patterson@soudermiller.com>; Chase Settle <Chase_Settle@eogresources.com>; Austin Weyant <austin.veyant@soudermiller.com>
Subject: RE: Irish Hills Work Plan & Initial C141

RE: EOG * Irish Hills #1 (pipeline release) * 30-015-23326

Hello all,

Quick question the API number used is for a well that has been plugged according to our records and all of the other Irish Hills wells in the area also seem to appear to be plugged? What is this pipeline associated to? Is it a gathering line for other locations besides Irish Hills sites? The only active Irish Hills location I can find around the area (and it is a long ways away from the coordinates provided) has an API of 30-015-23256.

Please advise.

Also because the Initial C-141 was sent with a work plan OCD was not able to catch that till we got to looking at this work plan in the order it was received. So only yesterday did the Initial C-141 get sent for processing. No RP number has been processed yet. Please make sure for future submissions to send in the Initial C-141 separately from a work plan that way it gets prioritized and sent over from processing.

I am wanting to hear back from you all regarding the plugged well status questions before I get the Initial C-141 processed I think.

Thanks,

Crystal Weaver
Environmental Specialist
OCD – Artesia District II
811 S. 1st Street
Artesia, NM 88210
Office: 575-748-1283 ext. 101
Cell: 575-840-5963
Fax: 575-748-9720

From: Melodie Sanjari <melodie.sanjari@soudermiller.com>
Sent: Thursday, March 15, 2018 11:52 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: Tucker, Shelly <stucker@blm.gov>; Heather Patterson <heather.patterson@soudermiller.com>; Chase Settle <Chase_Settle@eogresources.com>; Austin Weyant <austin.veyant@soudermiller.com>
Subject: Irish Hills Work Plan & Initial C141

Good Afternoon All,

Please find the attached soil remediation work plan for the incidents at the Irish Hills Pipeline on private land and federal mineral. The initial C141 has been attached separately as well as in the work plan.

Thank you all for your time

Melodie Sanjari
Staff Scientist



Souder, Miller & Associates

Engineering ♦ Environmental ♦ Surveying

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(574) 370-9782 (cell)

Bratcher, Mike, EMNRD

From: Melodie Sanjari <melodie.sanjari@soudermiller.com>
Sent: Thursday, March 15, 2018 11:52 AM
To: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD
Cc: Tucker, Shelly; Heather Patterson; Chase Settle; Austin Weyant
Subject: Irish Hills Work Plan & Initial C141
Attachments: Irish Hills Work Plan.pdf; Irish Hills Intial C141.pdf

Good Afternoon All,

Please find the attached soil remediation work plan for the incidents at the Irish Hills Pipeline on private land and federal mineral. The initial C141 has been attached separately as well as in the work plan.

Thank you all for your time

Melodie Sanjari
Staff Scientist



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DISTRICT OF COLUMBIA
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RECEIVED