

## Bratcher, Mike, EMNRD

---

**From:** Bratcher, Mike, EMNRD  
**Sent:** Tuesday, October 31, 2017 2:01 PM  
**To:** Chase Settle; Weaver, Crystal, EMNRD  
**Cc:** Bob Asher  
**Subject:** RE: Kleeman PD Battery Characterization Plan 2RP-4422

RE: EOG Y Resources, Inc. \* Kleeman PD & Platt PA Battery \* 2RP-4422 \* DOR: 9/12/17

Chase,

Your Characterization Plan for the above referenced release is not approved as submitted. There are a couple of things that may be just typos, but there are some issues, overall, with "V. Sampling Procedure" portion of the submittal. First, all the pages in the submittal except the Google Earth images are sideways, so the document had to be re-formatted just to review. Paragraph labeled "IV. NMOCD Ranking Criteria" states "The ranking for this site is **zero (10)** based on the following" You have called depth to ground water at 58', so site ranking is ten (10). In part "V Sampling Procedure", the last sentence in the first paragraph calls the site ranking a zero as well.

Also, in that paragraph, it states "Due to the nature of the release (produced water)....." It then goes on to indicate hydrocarbons will only be tested for in the first two feet, and if it comes back below RRAL, no further testing for hydrocarbon will be done. The C-141 reported 27 bbls oil & 110 bbls PW released, with only 1 bbl oil recovered. If the first two feet show little to no hydrocarbon impact, OCD would want to know what happened to the 26 bbls of oil that was unrecovered. Pretty much the same for chloride testing. If it cleans up within 4', OCD would likely request a sample be obtained for lab analysis of the produced water, at a minimum.

Sorry for any inconvenience, but I can't approve this the way it is.

Mike Bratcher  
NMOCD District 2  
811 South First Street  
Artesia, NM 88210  
575-748-1283 Ext 108

---

**From:** Chase Settle [mailto:Chase\_Settle@eogresources.com]  
**Sent:** Monday, October 23, 2017 2:36 PM  
**To:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>  
**Cc:** Bob Asher <Bob\_Asher@eogresources.com>  
**Subject:** Kleeman PD Battery Characterization Plan 2RP-4422

Please find attached the Characterization Plan for the below listed location.

Kleeman PD Battery  
30-015-00253  
Section 26, T18S-R26E  
Eddy County, New Mexico  
2RP-4422

Thank you,

*Chase Settle, M.S.*

Rep Safety & Environmental II

**EOG Resources**

105 S. 4<sup>th</sup> Street

Artesia, NM 88210

575-748-4171 (Office)

575-703-6537 (Cell)

