

From: [Yu, Olivia, EMNRD](#)
To: "Tavarez, Ike"; [Groves, Amber](#)
Cc: [Jamon Hohensee \(Jamon_Hohensee@eogresources.com\)](#); [Gonzales, Clair](#); [Zane_Kurtz@eogresources.com](#)
Subject: RE: EOG - Speedy 16 State Com 501H (1 RP 4744) and Beowulf 33 State Com 601H (1 RP 4745) - Project Status and Summary
Date: Tuesday, September 19, 2017 11:39:00 AM

Dear Mr. Tavarez:

Please address the below concerns.

1RP-4744: Speedy

- Assuming that excavation has been conducted and confirmation samples taken, what were the depths of the excavated areas? According to the delineation data provided, chloride levels in the proposed excavation depths exceeded permissible levels. Confirmation bottom and sidewall samples- to complete horizontal delineation- must demonstrate that chlorides remaining in soil are ≤ 600 mg/kg.
- Vertical delineation does not appear to be completed at Trench 3. Chloride levels at 9 ft. bgs exceed permissible chloride levels of 600 mg/kg. Is there a proposed plan to complete delineation? NMOCD suggests a borehole to be installed at the bottom of the 2 ft. excavation depth or depth at which confirmation samples indicated clean.

1RP-4745: Beowulf

- NMOCD will consider the delineation complete for 1RP-4745. Like approval from NMSLO is required.
- As implied below, confirmation bottom and sidewalls were taken for laboratory analyses at the excavation depths indicated on Figure 4. Is this correct?
- Chloride levels at 4 ft. bgs for Trench 5 exceed permissible chloride levels of 600 mg/kg. What is the proposed remediation plan? NMOCD requires excavation to 4 ft. bgs and the addition of a minimum 20-mil liner to encapsulate elevated levels at deeper depths. Please demarcate the dimensions and locations of sidewall confirmation samples for the lined area on a scaled map.

Please submit the delineation/remediation reports for 1RP-4744 and 1RP-4745 to NMOCD and NMSLO for a comprehensive review.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
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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.

-----Original Message-----

From: Tavarez, Ike [<mailto:Ike.Tavarez@tetrattech.com>]
Sent: Wednesday, August 16, 2017 7:58 PM
To: Groves, Amber <agroves@slo.state.nm.us>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Jamon Hohensee (Jamon_Hohensee@eogresources.com) <Jamon_Hohensee@eogresources.com>; Gonzales, Clair <Clair.Gonzales@tetrattech.com>; Zane_Kurtz@eogresources.com
Subject: EOG - Speedy 16 State Com 501H (1 RP 4744) and Beowulf 33 State Com 601H (1 RP 4745) - Project Status and Summary

Olivia and Amber,

Here are the two spill projects that Tetra Tech is currently working on for EOG located in Lea County, New Mexico. The spill sites were illegal dumps (produced water) on EOG properties. The depth to groundwater for both locations are greater than 200' below surface. Please review our summaries below and call me if we need to discuss further, thanks.

Beowulf 33 State: RP 4745

During the soil assessment, we noticed that the spill footprint was along a marked proposed pipeline right-of-way. We contacted Lucid Energy and they informed us that the proposed line would be installed the following week. Based on the line installation and field data, we proceeded with the removal of the shallow impacted soil along the proposed pipeline right-of-way. For proper removal and confirmation, bottom hole and sidewall samples were collected from the excavated areas. Currently, the new line has been installed and we are scheduling the additional removal of impacted soil outside the pipeline right-of-way. I have included the assessment data for your review. Once completed, Tetra Tech will prepare a closure report detailing the activities at the site.

Speedy 16 State: RP 4744

Based on the assessment, the site data showed a shallow chloride impact to the area. Due to the weather concerns, EOG wanted to move forward to start the removal on the shallow impacted soils. We have completed the removal and are waiting for the site confirmation samples, prior to backfilling. I have included the assessment data for your review. Once completed, Tetra Tech will prepare a closure report detailing the activities at the site.

Ike Tavarez, PG | Senior Project Manager

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