

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

State of New Mexico
Energy Minerals and Natural Resources

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

Received on
12/22/17
OCD District II

Form C-141
Revised April 3, 2017

Submit 1 Copy to appropriate District Office in
accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

NAB1801742031

OPERATOR

Initial Report Final Report

Name of Company: EOG Y Resources, Inc <i>25575</i>	Contact: Chase Settle
Address: 104 South 4 th Street, Artesia, NM	Telephone No.: 575-748-4171
Facility Name: Mobil CI #4 Pipeline	Facility Type: Pipeline

Surface Owner: Private	Mineral Owner: Federal	API No. 30-015-23212
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
J	6	19S	25E	190	South	250	East	EDDY

Latitude: 32.686980 Longitude: -104.52359 NAD83

NATURE OF RELEASE

Type of Release: Unknown	Volume of Release: Unknown	Volume Recovered: None
Source of Release: Unknown	Date and Hour of Occurrence: Unknown	Date and Hour of Discovery: 12/11/17 PM
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. * N/A		
Describe Cause of Problem and Remedial Action Taken. *		
During the investigation and cleanup of a non-reportable spill in the pasture of the Mobil CI #4 Pipeline, a much larger, historic spill was discovered going down past 10-foot bgs.		
Describe Area Affected and Cleanup Action Taken. *		
Plan to continue to further investigate and delineate the spill and create a workplan that will be submitted to the NMOCD before continuing the cleanup.		
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	Approved by Environmental Specialist <i>Crystal W</i>	
Title: Safety & Environmental Representative II	Approval Date: <i>11/16/18</i>	Expiration Date: <i>N/A</i>
E-mail Address: chase_settle@eogresources.com	Conditions of Approval: <i>see attached</i>	Attached <input checked="" type="checkbox"/> <i>ERP-4565</i>
Date: December 21, 2017	Phone: 575-748-4171	

* Attach Additional Sheets If Necessary

No RP

11/16/18 AB

Operator/Responsible Party,

The OCD has received the form C-141 you provided on **12/22/17** regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number ARP-4545 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 1/27/18. 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, January 16, 2018 1:59 PM
To: 'Heather Patterson'; Bratcher, Mike, EMNRD
Cc: Austin Weyant; Melodie Sanjari; Tucker, Shelly (stucker@blm.gov)
Subject: RE: C-141 Historic Mobil CI #4 Pipeline

Hello Heather,

Thank you for that. After you sent this I swear I went and checked all my emails for that date and my junk mail as well. I see below where you forwarded what she sent and I am on her sending list yet I got nothing. Our email box has become so ridiculous to deal with since IT and Outlook made their updates. I apologize for the confusion. Thank you for getting it to me again. I did get it this time.

I will discard the old one and give this new one to Amalia for processing.

Thanks again,

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: Heather Patterson [mailto:heather.patterson@soudermiller.com]
Sent: Tuesday, January 16, 2018 1:54 PM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Austin Weyant <austin.veyant@soudermiller.com>; Melodie Sanjari <melodie.sanjari@soudermiller.com>; Tucker, Shelly (stucker@blm.gov) <stucker@blm.gov>
Subject: FW: C-141 Historic Mobil CI #4 Pipeline

From: Melodie Sanjari
Sent: Wednesday, December 27, 2017 8:55 AM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Austin Weyant <austin.veyant@soudermiller.com>; Heather Patterson <heather.patterson@soudermiller.com>; Chase Settle <Chase_Settle@eogresources.com>; Tucker, Shelly <stucker@blm.gov>
Subject: RE: C-141 Historic Mobil CI #4 Pipeline

Good Morning!

Weaver, Crystal, EMNRD

From: Heather Patterson <heather.patterson@soudermiller.com>
Sent: Tuesday, January 16, 2018 1:53 PM
To: Weaver, Crystal, EMNRD; Melodie Sanjari; Bratcher, Mike, EMNRD
Cc: Austin Weyant; Chase Settle; Tucker, Shelly
Subject: RE: C-141 Historic Mobil CI #4 Pipeline

Melodie Sanjari responded and corrected this on 12/27/2017. I will resend her email, just in case you didn't get it.

From: Weaver, Crystal, EMNRD [mailto:Crystal.Weaver@state.nm.us]
Sent: Tuesday, January 16, 2018 1:50 PM
To: Melodie Sanjari <melodie.sanjari@soudermiller.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Austin Weyant <austin.veyant@soudermiller.com>; Heather Patterson <heather.patterson@soudermiller.com>; Chase Settle <Chase_Settle@eogresources.com>; Tucker, Shelly <stucker@blm.gov>
Subject: RE: C-141 Historic Mobil CI #4 Pipeline

Chase/Melodie,

I have waited but not received clarification on the location of this spill that I had asked for below on 12/22/17. The coordinates do not match up with the legal description written on the Initial C-141 and the legal description does not match up with the location of the API number for the well either. So I will just process it as is and request that a new Initial C-141 be submitted with the corrected information.

Thank you,

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: Weaver, Crystal, EMNRD
Sent: Friday, December 22, 2017 2:13 PM
To: 'Melodie Sanjari' <melodie.sanjari@soudermiller.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Austin Weyant <austin.veyant@soudermiller.com>; Heather Patterson <heather.patterson@soudermiller.com>; Chase Settle <Chase_Settle@eogresources.com>; Tucker, Shelly <stucker@blm.gov>
Subject: RE: C-141 Historic Mobil CI #4 Pipeline

Hello Chase/Melodie,

Weaver, Crystal, EMNRD

From: Chase Settle <Chase_Settle@eogresources.com>
Sent: Tuesday, January 16, 2018 1:56 PM
To: Weaver, Crystal, EMNRD
Cc: Melodie Sanjari; Heather Patterson; Austin Weyant
Subject: FW: C-141 Historic Mobil CI #4 Pipeline
Attachments: Mobile CI #4 Pipeline Initial C141.pdf

Crystal,

I was copied in the email that was sent from Melodie Sanjari with SMA on December 27, 2017. I believe this corrected the issues that you pointed out in your December 22, 2017 email.

Thank you,

Chase

From: Melodie Sanjari [mailto:melodie.sanjari@soudermiller.com]
Sent: Wednesday, December 27, 2017 8:55 AM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Austin Weyant <austin.veyant@soudermiller.com>; Heather Patterson <heather.patterson@soudermiller.com>; Chase Settle <Chase_Settle@eogresources.com>; Tucker, Shelly <stucker@blm.gov>
Subject: RE: C-141 Historic Mobil CI #4 Pipeline

External email. Use caution.
Good Morning!

Attached is the initial C141 with those minor changes made. Thank you for bringing them to my attention!

Thank you everyone and Happy New Year!

Melodie Sanjari

Souder, Miller & Associates
Engineering ♦ Environmental ♦ Surveying
201 Halagueno St
Carlsbad, NM 88220
www.soudermiller.com
(574)370-9782 (mobile)



From: Weaver, Crystal, EMNRD [mailto:Crystal.Weaver@state.nm.us]
Sent: Friday, December 22, 2017 2:13 PM
To: Melodie Sanjari <melodie.sanjari@soudermiller.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>

Weaver, Crystal, EMNRD

From: Weaver, Crystal, EMNRD
Sent: Tuesday, January 16, 2018 1:50 PM
To: 'Melodie Sanjari'; Bratcher, Mike, EMNRD
Cc: 'Austin Weyant'; 'Heather Patterson'; 'Chase Settle'; 'Tucker, Shelly'
Subject: RE: C-141 Historic Mobil CI #4 Pipeline

Chase/Melodie,

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Thank you,

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To: 'Melodie Sanjari' <melodie.sanjari@soudermiller.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Austin Weyant <austin.weyant@soudermiller.com>; Heather Patterson <heather.patterson@soudermiller.com>; Chase Settle <Chase_Settle@eogresources.com>; Tucker, Shelly <stucker@blm.gov>
Subject: RE: C-141 Historic Mobil CI #4 Pipeline

Hello Chase/Melodie,

I show the coordinates provided on the C-141 end up in Section 6, 19S 25E Unit Letter J, however, on the legal description on the C-141 form a different location is stated (completely different Section and Unit Letter). Can we get this either clarified or corrected please.

Thank you,

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 [<mailto:melodie.sanjari@soudermiller.com>]

Sent: Friday, December 22, 2017 10:36 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: Austin Weyant <austin.veyant@soudermiller.com>; Heather Patterson <heather.patterson@soudermiller.com>;

Chase Settle <Chase_Settle@eogresources.com>; Tucker, Shelly <stucker@blm.gov>

Subject: C-141 Historic Mobil CI #4 Pipeline

Good Morning All,

Please find the attached initial C-141 for the historic spill found at the Mobil CI #4 Pipeline site.

Merry Christmas!

Melodie Sanjari

Souder, Miller & Associates

Engineering ♦ Environmental ♦ Surveying

201 Halagueno St

Carlsbad, NM 88220

www.soudermiller.com

(574)370-9782 (mobile)



Weaver, Crystal, EMNRD

From: Melodie Sanjari <melodie.sanjari@soudermiller.com>
Sent: Friday, December 22, 2017 10:36 AM
To: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD
Cc: Austin Weyant; Heather Patterson; Chase Settle; Tucker, Shelly
Subject: C-141 Historic Mobil CI #4 Pipeline
Attachments: Mobile CI #4 Pipeline C141.pdf

Good Morning All,

Please find the attached initial C-141 for the historic spill found at the Mobil CI #4 Pipeline site.

Merry Christmas!

Melodie Sanjari

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