



EOG Resources, Inc.
Artesia Division Office
104 S. 4th Street
Artesia, NM, 88210

EOG Resources, Inc.

Remediation Plan Addendum

Achen Frey DM #011

30-015-24536

Unit I, Section 14, T17S, R25E

Eddy County, New Mexico

Incident ID: nAPP2135057740

June 13, 2022

Achen Frey DM #011
Remediation Plan



June 13, 2022

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Achen Frey DM #011
Remediation Plan



June 13, 2022



EOG Resources, Inc.
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Artesia, NM, 88210

I. Remediation Plan Addendum

Introduction

The purpose of this addendum is to provide additional information requested by the New Mexico Oil Conservation Division (NMOCD) regarding the subject remediation plan submitted by EOG Resources on May 20, 2022. Additional details were requested regarding the proposed in-situ remediation treatment, which was discussed during an on-line meeting with NMOCD, EOG Resources, and Envirotech personnel on June 2, 2022.

The subject remediation plan proposes to treat residual petroleum hydrocarbon contaminated soil (PCS) at the Achen Frey DM #11 (Incident ID: nAPP2135057740). A remediation excavation will be conducted to 25 feet below ground surface (bgs). If PCS is identified above closure criteria at depths greater than 25 feet bgs, the following in-situ treatment will be implemented.

In-situ Treatment

The base of the remediation excavation will be capped with a clay liner and backfilled with non-waste containing soil. In-situ treatment wells will then be installed utilizing a drill rig. The treatment wells will provide a conveyance for in-situ bio-remediation solutions that will be injected to address the residual hydrocarbon contamination below 25 feet bgs. The impacted area is illustrated in **Appendix 1**.

Permitting and Notifications

Prior to performing in-situ treatment well installation activities, an *Application for Permit to Drill A Well with No Consumptive Use of Water* will be submitted and approved by the District II Office of the New Mexico Office of the State Engineer (NMOSE). Also, a project notification will be submitted to the NMOCD at least 48 hours prior to well installation activities, and a public underground utility locate request will be submitted to New Mexico 811 four (4) days prior to earth disturbance.

Well Construction

One (1) well will be installed every 100 square feet within the remediation zone. The remediation zone will be designated after the remediation excavation is completed to 25 feet bgs and confirmation laboratory analytical results are received and reviewed. The wells will be constructed of two (2) inch pvc pipe with slotted well screen installed for the last 5 to 10 feet of the well. The depth of each well and screened interval will be staggered to provide numerous points of contact for the microbial product and the residual contamination. Location of the screened intervals will be based on the field screening data obtained during the installation of the wells.

Field screening for volatile organic compounds (VOCs) will be conducted with a photo-ionization detector (PID) organic vapor meter (OVM). Prior to performing field screening activities, the PID-

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OVM was first calibrated with 100 parts per million (ppm) isobutylene gas. Samples will also be field screened for chlorides using a *Hach Chloride Test Kit*. Field screening will be performed every five (5) feet. Samples will be collected from the intervals that return the highest OVM reading and at the terminus of each bore hole.

Remediation Solution

The proposed in-situ treatment is Liquid Remediate™ Cleaning Agent. It is composed of live synergistic bacteria, a biosurfactant agent, and water. The solution is diluted with 10 parts of water to 1 part of solution. One (1) 5-gallon container of the Liquid Remediate™ Cleaning Agent will treat up to 50 cubic yards of soil. Information provided by the manufacturer is provided in **Appendix 2**.

The amount of Liquid Remediate™ Cleaning Agent and water will be dependent upon the volume of contamination left in place. The water used to dilute the Liquid Remediate™ Cleaning Agent will be obtained from the Alfordale non-potable water station located on the west side of Highway 285 near Penasco Draw south of Artesia, New Mexico. A characterization sample of the water was collected on June 7, 2022. The laboratory analytical results are provided in **Appendix 3**.

The microbial strain injected into the wells will be absorbed into the surrounding soils, promoting the digestion of organics; therefore, resulting in the breakdown of the residual hydrocarbons. The microbial strain will be injected into the wells every two (2) weeks for approximately twelve (12) weeks, totaling six (6) separate treatments.

Remediation Assessment

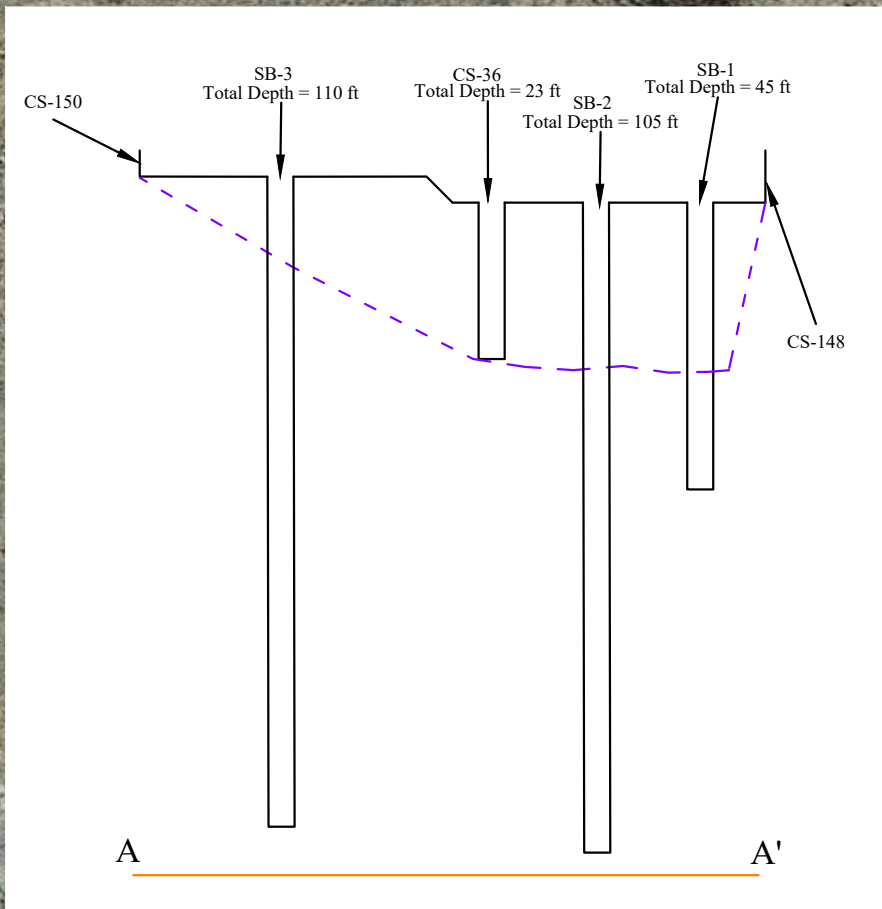
Thirty (30) days after the last treatment, a core rig will be brought in to assess the effectiveness of the treatment within the remediation zone. This will consist of advancing one (1) soil boring per 200 square feet, with confirmation samples being collected at five (5) foot increments at depths ranging from 30 feet to 50 feet bgs.



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Appendix 1

Figure 1, Revised Site Map



Excavation Dimensions:
402 ft by 190 ft by 4-10 ft bgs

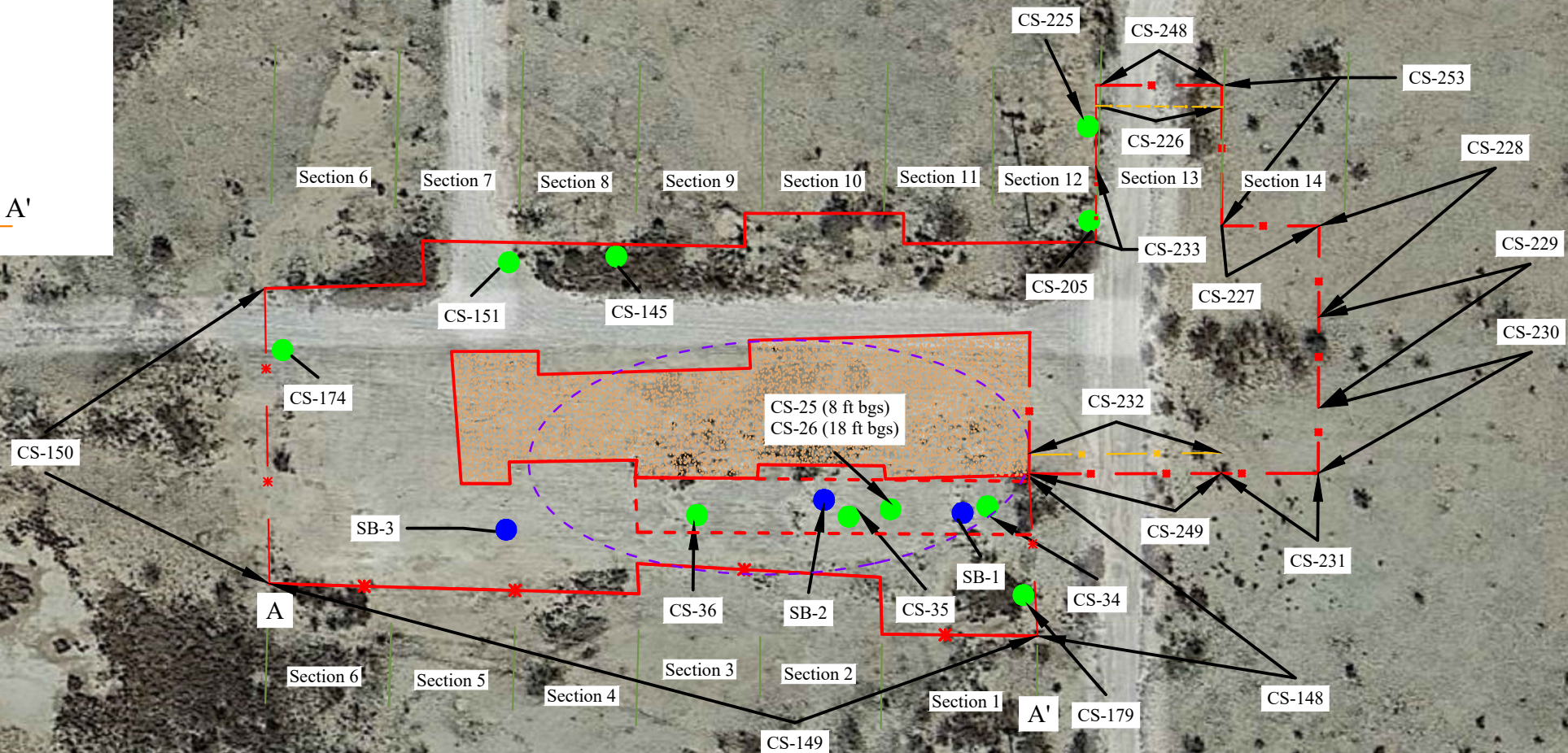


Figure 1, Revised Site Map

EOG Resources
Achen Frey DM #011
API: 30-015-24536

Unit I, Section 14, Township 17S, Range 25E
32.83348, -104.44786
Eddy County, New Mexico



5796 U.S. HIGHWAY 64, FARMINGTON, NM 87401 505-632-0615

MAP DRAWN BY:
KJCS

DATE DRAWN:
4/12/2022

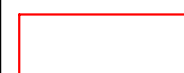
REVISIONS BY:
BAH

DATE REVISED:
5/18/2022

APPROVED BY:
NAME

DATE APPROVED:
DATE

LEGEND



- Excavation as of 05/12/2022



- Unexcavated Soil



- Trench (10 ft below ground surface (bgs))



- Soil borings



- Pot holes



- 5-point composite wall samples



- 5-point composite wall samples (wall no longer exists)



- Inferred Area of TPH Contamination (215 ft by 91 ft by 25 ft bgs)



Scale
1" = 65 ft

** GPS Coordinates +/- 3 meters

Achen Frey DM #011
Remediation Plan



June 13, 2022

Appendix 2

**Liquid Remediact™ Cleaning Agent Product Sheet
OSHA HazCom Message
Spillway Correspondence**

Liquid Remediact™ Cleaning Agent



CLN352 Remediator,5 gal. Container,1 each

Liquid formula <omit>can</omit> be used for bioremediation on land to turn oily spills into carbon dioxide and water.

- Special formula of microbes that leave only carbon dioxide and water behind, so there are no harmful by-products left in the environment
- Each mixed or diluted gallon will remediate approximately one cubic yard of soil. Reapplication may need to occur
- Adheres to the hydrocarbon contaminant and does not wash away
- Dilute product 10:1. Apply with a spray bottle, backpack sprayer, or pressure washer on pavement, soil or grassed areas



Specifications

Style	Remediator
Brand	SpillAway
Intended Use	Asphalt and Concrete Surfaces, Soil, Rocks and Water
Temperature Limit	Works from 42°F (5.5°C) to 120°F (49°C)
Treats	Treats 10,000 gal. or up to 50 cu. yds.
VOC Content	VOC Free
Color	Clear
Volume	5 gal. Container
Distributor Part Number	6154077;04088x00473
Sold as	1 each
Weight	42 lbs.
# per Pallet	48
Composition	Live Synergistic Bacteria, Bio-Surfactant Agent & Water

Pigalog® Page Number

Page 182

Metric Equivalent

Weight	19.1 kg
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Technical Information

CountryShipOnly

This product can ONLY be shipped to: United States, Bolivia, Canada, China, Colombia, Costa Rica, Ecuador, Ghana, Honduras, Iraq, Mexico, US Virgin Islands.

Technical Documents

Instructions for Liquid Remediate™ Cleaning Agent

Why is there no SDS?

**New Pig**

World's best stuff for leaks, drips and spills.

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1-855-493-4647 • Fax: 1-800-621-7447 • newpig.com • hothogs@newpig.com

Environmental Product Innovation **Liquid Remediate™**



Summary

Liquid Remediate™ from the EnviroLogic SpillAway Brands™ range of bio-remedial probiotic products for industrial & commercial hydrocarbon contamination clean-up.

- Removal of hydrocarbon contamination
- Environmentally friendly
- Easy to use
- Low cost

Using Liquid Remediate™ can significantly reduce the carbon footprint of dealing with hydrocarbon contamination as it may be used in-situ to eradicate the contamination without posing a threat to the environment. By augmenting the natural process of bio-remediation, Liquid Remediate removes the hydrocarbons, leaving just water and very small traces of inert gases.

Liquid Remediate™ is provided as a concentrate so the impact on carbon footprint and actual costs for transport, storage and handling is low. The product has the ability to bio-remediate most hydrocarbons with a minimum amount of equipment, labour and costs and it will cover a broad range of contamination projects as it can be used both in situ and ex situ in either soil or water. The product is simple to use, requiring no additional PPE than needed for the contamination, so the problem can be solved in-house for most industries.

In addition to using on its own, Liquid Remediate™ can also be used in conjunction with other products in the SpillAway Brands range which are similarly environmentally friendly and provide additional benefits such as:

- Immediate absorption of the hydrocarbon odor
- Breakdown of long chain hydrocarbons, PAHs, PCBs, reduce Heavy Metals

Liquid Remediate™ is a versatile and modern product which solves a contamination problem with due consideration to maintaining the environment.

How is the product different from what is already on the market? What are its unique features/applications?

Liquid Remediate™ is unique due to a combination of features:

- Used for bio-remediation of hydrocarbons in both soil and water
- Contains beneficial probiotic live bacteria
- Long shelf life (unopened product at least 2 years)
- Minimal requirement for labour, equipment and cost
- Can be used in-situ or ex-situ
- Environmentally friendly
- Low hazard

What sets Liquid Remediate™ apart from most chemical solutions (which are hazardous) is that it can be used in situ with minimal concerns for safety and environmental impact. What sets it apart from solutions using enzymes is that the bacteria in Liquid Remediate™ not only produce enzymes, but also remediate the contamination, so the bio-remediation is a continual probiotic process. Also, in comparison with services offering to bio-remediate hydrocarbons by aerating the soil, using Liquid Remediate™ is faster and considerably much less costly, particularly in terms of the equipment and manpower required.

Liquid Remediate™ simply requires the product to be diluted, then added to the soil or water by the most appropriate method (eg Geoprobe injection; Pressure spraying; Land Farming etc), the soil should be kept moist and possibly turned over after 30 days. Liquid Remediate™ should clean-up the toughest contamination within 60 days leaving water and some traces of inert gases.

Because Liquid Remediate™ has a low hazard rating as a concentrate, and when diluted at the standard rate of 10:1 with water the hazard category is negligible, there is no requirement for specialist PPE other than that is required for the contamination hazard.

What does it do and what environmental benefit does it deliver?

Liquid Remediate™ harnesses the natural process of bio-remediation which “digests” hydrocarbons leaving water and small amounts inert gases as by-products. There is bacteria present in soil which will naturally digest hydrocarbons. However, this process normally takes a very long time if left to nature simply because there is not enough of the correct bacteria present or the indigenous bacteria are overwhelmed by the amount of toxins from the contamination.

Liquid Remediate™ holds the relevant bacterial cultures in suspension until ready to use on a spill. By adding water and agitating the diluted mixture the bacteria are activated and produce a biomass in the soil which digests the hydrocarbons. This process takes 30-60 days.

The environmental benefit of using Liquid Remediate™ is that the product is merely augmenting a natural process – just doing what nature does only more quickly with the proper bacteria for the job. Being able to deal with hydrocarbon contamination in situ means that the organization is able to keep the contamination where it occurred rather than transport it off site. The transporting from Point “A” to Point “B” only serves to contaminate a second site & adds to the carbon footprint.

As the company where the problem originated is able to solve their own contamination issue using Liquid Remediate™, instead of resorting to a third party, it helps to foster a responsible attitude towards maintaining the environment. The product itself is bio-degradable and produced from sustainable sources.



How broad is its reach across business sectors and/or scalability?

The types of applications that Liquid Remediate™ are varied, and scalability is impressive when used with compatible products from the SpillAway Brands™ product range. But the biggest factor for its reach across business sectors is that it can save a lot of money in comparison with other clean-up solutions – some examples:

- Transformer oil which has seeped into shallow earth in gardens
- Heating oil spills up to 1m deep (with Dry Remediate™ to absorb smells and start the remediation process)
- Industrial sites where heavy oils have been spilled and seeped into deep ground (with Dry Remediate™; HC™ either for soil or for water to breakdown long-chain hydrocarbons)
- Housing development sites (with Dry Remediate™; HC™)
- Farmland where oil pipes have been broken and seeped oil into the ground (

Liquid Remediate™ can be used wherever there have been fuel spills, oil spills, oil leakages that have penetrated the ground; anything from small household kerosene leaks to complete pipe burst situations or major spills. Used in conjunction with other products for breaking down heavy oils or bunker fuels, Liquid Remediate is used at refinery sites to clear spillage in reed beds.

How easily can the product be installed/retrofitted?

Because the product is a fluid it is simple to use and there is very little disruption of surrounding non-contaminated areas. And after bio-remediation is completed the environment is virtually restored to its pristine condition.

For in-situ projects if space is tight the product can be applied manually – the solution is all about getting the product mixed into the soil and keeping it moist.

For ex-situ projects the soil can be applied with standard spray or farm equipment. Or simply added to a contained & bunded area, keeping the soil moist, where the Liquid Remediate will bio-remediate, removing the contamination.

Projects vary in scale and size, Liquid Remediate™ is used by many parties to treat and remove hydrocarbon contamination in a simple and highly effective manner.

www.spillaway.com

EnviroLogic Biobased Technologies
Spillaway Brands
SpillAway Projects Ltd UK



4901 UMBRIA ST PHILADELPHIA PA 19128 USA

Phn: 215.930.0111

Fax: 215.930.0411

Brittany Hall

From: Jay H Murland <inquiry@spillaway.com>
Sent: Friday, June 3, 2022 7:14 AM
To: Brittany Hall
Cc: mark@spillaway.com
Subject: RE: Remediate questions (r)
Attachments: Environmental Product Innovation (1)revUSA.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Brittany –

The microbes in Liquid Remediate perform equally well in neutral as well as high chloride environments. I do not have specific data, but to say the microbes are efficient in adjusting to harsh environmental conditions. The “LR” product is diverse enough to operate in fresh or salty water.

“LR” does not require oxygenation. The microbes are facultative, meaning their metabolic activity is equal in the presence of or the absence of oxygen.

Dispersion will be determined by the subsurface soil density. At your depth, most contractors use a Geoprobe or drill out a matrix inserting slotted PVC pipe, then inject under pressure for horizontal flow.

We have many customers who use “LR” in a 50/50 combination with HC100. (Pls see attached for add’l information)
When you decide to go forward, let me know to get current pricing.

Thank you for your inquiry,
Best regards,

Jay H Murland CEO
EnviroLogic Biobased Technologies Inc
Spillaway Brands
www.spillaway.com

jay.murland@spillaway.com

phn: 215-930-0111

fax: 215-930-0411

shipping: 1260 E Woodland Ave #16

mail: PO Box 5311

Springfield PA 19064-5311

From: Brittany Hall <bhall@envirotech-inc.com>
Sent: Thursday, June 2, 2022 5:12 PM
To: inquiry@spillaway.com
Subject: Remediate questions

Good afternoon,

We are proposing to use liquid Remediate at a site that has high chloride concentrations. Do you have any data on how the product performs in a salty environment?

Also, we would be injecting to a depth between 25 feet and 40 feet below ground surface. Does this product need to be oxygenated and how does it disperse through the subsurface?

Thank you,

Brittany Hall

Environmental Staff Scientist

Envirotech, Inc. | 5796 US Highway 64 | Farmington, NM 87401

505.632.0615 Office | 505.632.1865 Fax | 505.947.9179 Cell



<http://envirotech-inc.com/>

OSHA – 29 CFR 1910.1200 Hazard Communications

**** This product is considered an "article" or "drug" (i.e.: "First Aid Supply") under OSHA and does not require an SDS (Safety Data Sheet)****

OSHA – 29 CFR 1910.1200 Hazard Communications

"Article" means a manufactured item: (i) which is formed to a specific shape or design during manufacture; (ii) which has end use function(s) dependent in whole or in part upon its shape or design during end use; and (iii) which does not release, or otherwise result in exposure to, a hazardous chemical under normal conditions of use.

OSHA's alignment of the hazard communication standard (29 CFR 1910.1200) with the UN Globally Harmonized Standard of Classification and Labeling of Chemicals (GHS) provides a unified, consistent method of identifying chemical hazards. However, not every product in the workplace is hazardous. Non-hazardous products are sometimes called "articles" and because of their non-hazardous nature do not require a safety data sheet (SDS).

(c) "Definitions."

"Article" means a manufactured item other than a fluid or particle: (i) which is formed to a specific shape or design during manufacture; (ii) which has end use function(s) dependent in whole or in part upon its shape or design during end use; and (iii) which under normal conditions of use does not release more than very small quantities, e.g., minute or trace amounts of a hazardous chemical (as determined under paragraph (d) of this section), and does not pose a physical hazard or health risk to employees.

(d) "Hazard Determination."

(d)(1)

Chemical manufacturers and importers shall evaluate chemicals produced in their workplaces or imported by them to determine if they are hazardous. Employers are not required to evaluate chemicals unless they choose not to rely on the evaluation performed by the chemical manufacturer or importer for the chemical to satisfy this requirement.

(d)(2)

Chemical manufacturers, importers or employers evaluating chemicals shall identify and consider the available scientific evidence concerning such hazards. For health hazards, evidence which is statistically significant and which is based on at least one positive study conducted in accordance with established scientific principles is considered to be sufficient to establish a hazardous effect if the results of the study meet the definitions of health hazards in this section. Appendix A shall be consulted for the scope of health hazards covered, and Appendix B shall be consulted for the criteria to be followed with respect to the completeness of the evaluation, and the data to be reported.

29 CFR 1910.1200(b)(6)(vi)

Drugs intended for personal consumption by employees (i.e. for first aid) are not subject to the SDS requirements prescribed by the OSHA Hazard Communication Standard, which states: 1910.1200(b)(6)(vi)...Any drug, as that term is defined in the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 301 et seq.), when it is in solid, final form for direct administration to the patient (e.g., tablets or pills); drugs which are packaged by the chemical manufacturer for sale to consumers in a retail establishment (e.g., over-the-counter drugs); and drugs intended for personal consumption by employees while in the workplace (e.g., first aid supplies);



New Pig

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Tipton, PA 16684-0304

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WATER QUALITY ASSESSMENT

**Highway 18 Fuel Spill
September 4, 2006
San Bernardino National Forest**

October 31, 2007

Prepared For:

**U.S.D.A. FOREST SERVICE
SAN BERNARDINO NATIONAL FOREST
1209 Lytle Creek Road
Lytle Creek, CA 92358**

Prepared By:

**ROKEN ENGINEERING SERVICES
443 Anson Avenue
Rohnert Park, California 94928**

ROKEN Project No. KAI-0097

443 Anson Avenue
Rohnert Park, CA 94928
T: (707) 664-0560
F: (707) 664-8893
info@rokenllc.com

October 31, 2007

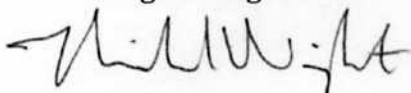
U.S.D.A. Forest Service
San Bernardino National Forest
1209 Lytle Creek Road
Lytle Creek, CA 92358

RE: WATER QUALITY ASSESSMENT
Highway 18 Gasoline Spill - September 4, 2006
San Bernardino National Forest
ROKEN Project No. KAI-0097

ROKEN Engineering Services (ROKEN) has completed the prescribed Water Quality Assessment for the above referenced site. The primary purpose of this assessment was to evaluate the environmental conditions resulting from a September 2006 truck accident that released gasoline into a ravine in the San Bernardino National Forest. The report is comprehensive, presenting pertinent details regarding the planning and execution of the workplan, field test and analytical results, the rationale applied to evaluate the results, and conclusions and recommendations.

We appreciate the opportunity to provide these services. Please contact us at your convenience, should you have any questions or comments regarding the information presented in this report.

Sincerely,
ROKEN Engineering Services



Michael Wright
Principal-Operations Manager



Expires October 31, 2009

ii

RISK MANAGEMENT

CONSTRUCTION
MANAGEMENT

ENVIRONMENTAL
SCIENCE & ENGINEERING

NATURAL RESOURCE
ASSESSMENT

DEVIL CANYON – SEPTEMBER 2006 THROUGH JUNE 2007

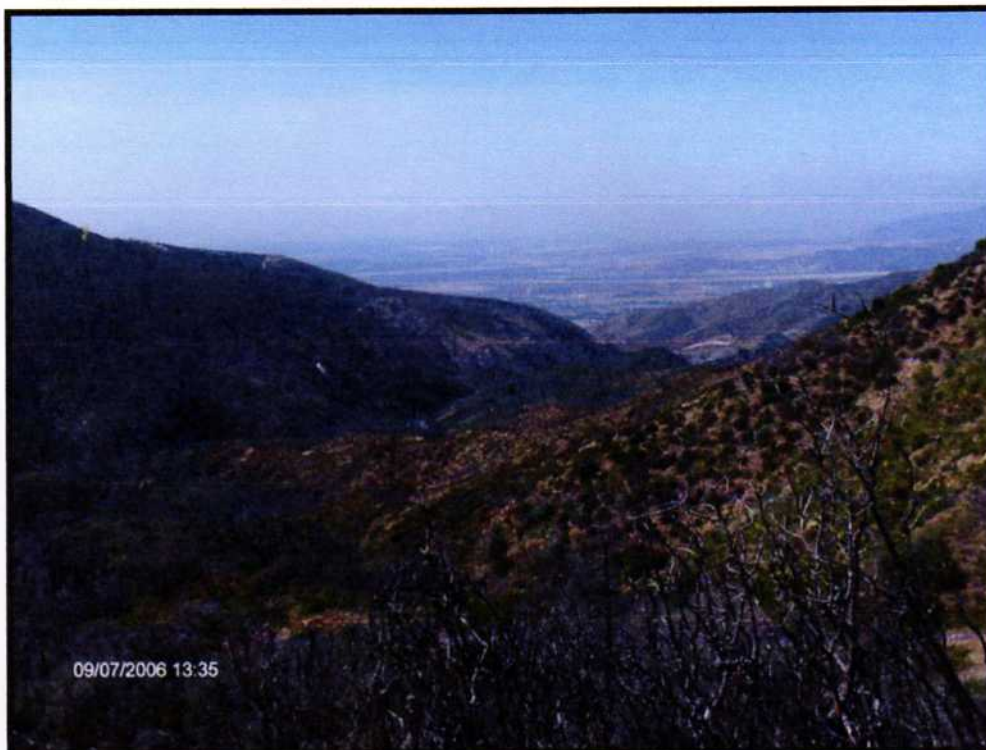


Photo 3: View southwest from top of Ravine. Devil Canyon leading to Resort and State Water Project - Inland Feeder and DWR Power Plant..



Photo 4: View south – East Fork of Devil Canyon Creek (foreground) and Pine Creek Resort (background).



Photo 15: Ravine sample location Ravine No. 5.



Photo 16: October 20, 2006 Remedial action at Highway 18 spill site - HMHTTC Vacuum Truck with Liquid Remediate™ at top of Ravine.

The following table presents a summary of the sediment sample analytical results compared to the regulatory site screening criteria as described in SECTION 6.4.3.

SEDIMENT – SUMMARY OF ANALYTICAL RESULTS

Compound	October 2006 to June 2007 Highest Level Detected (mg/kg)	June 2007 Highest Level Detected (mg/kg)	USEPA PRGs Residential (mg/kg)	USEPA SSL DAF 1 (mg/kg)	NYDEC Benthitic Aquatic Life Acute (mg/kg)	NYDEC Benthitic Aquatic Life Chronic (mg/kg)	MSSL (mg/kg)
n-Butylbenzene	34.1	ND	240	NA	NA	NA	NA
Ethylbenzene	201	ND	400	0.7	212	24	NA
Freon-12	0.0079 ⁽¹⁾	ND	94	NA	NA	NA	NA
Isopropylbenzene	24.7	ND	NA	NA	105	12	NA
4-Isopropyltoluene	0.753	ND	NA	NA	NA	NA	NA
Naphthalene	20.6	ND	56/1.7 ⁽²⁾	4	258	30	NA
n-Propylbenzene	90.2	ND	240	NA	NA	NA	NA
1,2,4-TMB	654	ND	52	NA	1,631	186	NA
1,3,5-TMB	181	ND	21	NA	NA	NA	NA
Toluene	123	ND	520	0.6	235	49	NA
m,p-Xylene	946	ND	270 ⁽³⁾	10 ⁽³⁾	833 ⁽³⁾	92 ⁽³⁾	NA
o-Xylene	339	ND	270 ⁽³⁾	10 ⁽³⁾	833 ⁽³⁾	92 ⁽³⁾	NA
TPH-g	13,800	117 ⁽⁴⁾	NA	NA	NA	NA	100

USEPA PRGs = Preliminary Remediation Goals from U.S EPA Region IX

SSL DAF 1 = PRG Site Screening Levels - Dilution Attenuation Factor 1, most stringent

NYDEC Benthitic Aquatic Life = Freshwater aquatic sediment screening levels for Acute and Chronic

MSSL = Maximum Soil Screening Levels for TPH above Drinking Water Aquifers, Guidance for Petroleum-

Impacted Sites: Soil Screening Levels, California Water Board - Los Angeles Region, May 1996.

Freon-12 = Dichlorodifluoromethane reported in micrograms per kilogram (mg/kg)

TMB = Trimethylbenzene reported in micrograms per kilogram (mg/kg)

TPH-g = Total Petroleum Hydrocarbons as Gasoline reported in

ND = Not detected above the analytical method reporting limit

NA = Not applicable, Not available, Not listed in regulatory guidelines

⁽¹⁾Detected in one (1) sample only at low concentration – likely laboratory contaminant

⁽²⁾CAL-Modified PRG

⁽³⁾Concentration for Total Xylenes

⁽⁴⁾Detected at LQR No.4, approximate 10 ft. x 10 ft. area with localized gasoline residual

COMPOUND	Oct. 2006 to June 2007 Highest Level Detected (µg/l)	June 2007 Highest Level Detected (µg/l)	USEPA TAP WATER (µg/l)	USEPA MCL (µg/l)	NOAA SQuiRTS CCC (µg/l)	NYDEC Benthitic Aquatic Life Acute (µg/l)	NYDEC Benthitic Aquatic Life Chronic (µg/l)	USEPA Taste and Odor (µg/l)
Chloromethane	1.29 ⁽¹⁾	ND	160	NA	NA	NA	NA	NA
Ethylbenzene	4.14	ND	1,300	700	7.3	150	17	NA
4-Isopropyltoluene	5.97	5.97	NA	NA	NA	NA	NA	NA
Methylene Chloride	2.98	ND	4.3	NA	NA	NA	NA	NA
Naphthalene	2.48	ND	6.2/ 0.093⁽²⁾	NA	NA	110	13	NA
n-Propylbenzene	1.52	ND	240	NA	NA	NA	NA	NA
1,2,4-TMB	25	6.09	12	NA	NA	290	33	NA
1,3,5-TMB	7.13	1.68	12	NA	NA	NA	NA	NA
Toluene	10.4	ND	720	1,000	9.8	480	100	NA
m,p-Xylene	36.1	ND	210 ⁽³⁾	10,000 ⁽³⁾	13⁽³⁾	590 ⁽³⁾	65 ⁽³⁾	NA
o-Xylene	19.2	ND	210 ⁽³⁾	10,000 ⁽³⁾	13⁽³⁾	590 ⁽³⁾	65 ⁽³⁾	NA
TPH-g	356	ND	NA	NA	NA	NA	NA	5

USEPA TAP WATER = Preliminary Remediation Goals from U.S EPA Region IX

SSL DAF 1 = PRG Site Screening Levels - Dilution Attenuation Factor 1, most stringent.

USEPA MCL = Maximum Contaminant Level (MCL) - Primary Standard

NOAA SQuiRTS = Screening Quick Reference Tables water quality criteria for protection of aquatic organisms.

CCC = Criterion Continuous Concentration is estimate of the highest concentration of a material in surface water to which an aquatic community can be exposed indefinitely without resulting in an unacceptable effect.

Benthitic Aquatic Life = Freshwater aquatic water screening levels for Acute and Chronic developed by NYDEC.

USEPA MCL Taste and Odor = MCL Secondary Standard for odor and/or taste nuisance

TMB = Trimethylbenzene reported in micrograms per liter (µg/l)

TPH-g = Total Petroleum Hydrocarbons as Gasoline; Laboratory analytical method reporting limit = 100 µg/l.

ND = Not detected above the analytical method reporting limit.

NA = Not applicable, Not available, Not listed in regulatory guidelines

⁽¹⁾Detected in Trip Blank sample only – likely laboratory contaminant

⁽²⁾CAL-Modified PRG

⁽³⁾ Concentration for Total Xylenes

Achen Frey DM #011
Remediation Plan



June 13, 2022

Appendix 3

Laboratory Analytical Results

Report to:
Greg Crabtree



envirotech

Practical Solutions for a Better Tomorrow

Analytical Report

EOG Resources

Project Name: Achen Frey DM #11 Water Source Sample

Work Order: E206046

Job Number: 19034-0009

Received: 6/8/2022

Revision: 1

Report Reviewed By:

Walter Hinchman
Laboratory Director
6/10/22

5796 U.S. Hwy 64
Farmington, NM 87401

Phone: (505) 632-1881
Envirotech-inc.com



Envirotech Inc. certifies the test results meet all requirements of TNI unless noted otherwise.
Statement of Data Authenticity: Envirotech Inc. attests the data reported has not been altered in any way.
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Envirotech Inc. holds the Utah TNI certification NM00979 for data reported.
Envirotech Inc. holds the Texas TNI certification T104704557 for data reported.
Envirotech Inc. holds the NM SDWA certification for data reported. (Lab #NM00979)

Date Reported: 6/10/22

Greg Crabtree
104 South 4th Street
Artesia, NM 88210



Project Name: Achen Frey DM #11 Water Source Sample
Workorder: E206046
Date Received: 6/8/2022 10:00:00AM

Greg Crabtree,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 6/8/2022 10:00:00AM, under the Project Name: Achen Frey DM #11 Water Source Sample.

The analytical test results summarized in this report with the Project Name: Achen Frey DM #11 Water Source Sample apply to the individual samples collected, identified and submitted bearing the project name on the enclosed chain-of-custody. Subcontracted sample analyses not conducted by Envirotech, Inc., are attached in full as issued by the subcontract laboratory.

Please review the Chain-of-Custody (COC) and Sample Receipt Checklist (SRC) for any issues regarding sample receipt temperature, containers, preservation etc. To best understand your test results, review the entire report summarizing your sample data and the associated quality control batch data.

All reported data in this analytical report were analyzed according to the referenced method(s) and are in compliance with the latest NELAC/TNI standards, unless otherwise noted. Samples or analytical quality control parameters not meeting specific QC criteria are qualified with a data flag. Data flag definitions are located in the Notes and Definitions section of this analytical report.

If you have any questions concerning this report, please feel free to contact Envirotech, Inc.

Respectfully,

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Sample Summary

EOG Resources	Project Name:	Achen Frey DM #11 Water Source Sample	Reported:
104 South 4th Street	Project Number:	19034-0009	
Artesia NM, 88210	Project Manager:	Greg Crabtree	06/10/22 16:41

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
Source Water	E206046-01A	Aqueous	06/07/22	06/08/22	Poly 500mL
	E206046-01B	Aqueous	06/07/22	06/08/22	Poly 500mL
	E206046-01C	Aqueous	06/07/22	06/08/22	Poly 250mL
	E206046-01D	Aqueous	06/07/22	06/08/22	VOA Vial, 40mL; HCl
	E206046-01E	Aqueous	06/07/22	06/08/22	VOA Vial, 40mL; HCl
	E206046-01F	Aqueous	06/07/22	06/08/22	VOA Vial, 40mL; HCl
	E206046-01G	Aqueous	06/07/22	06/08/22	VOA Vial, 40mL
	E206046-01H	Aqueous	06/07/22	06/08/22	VOA Vial, 40mL
	E206046-01I	Aqueous	06/07/22	06/08/22	VOA Vial, 40mL



Sample Data

EOG Resources 104 South 4th Street Artesia NM, 88210	Project Name: Achen Frey DM #11 Water Source Sample Project Number: 19034-0009 Project Manager: Greg Crabtree	Reported: 6/10/2022 4:41:02PM
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Source Water

E206046-01

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Wet Chem/Gravimetric by SM2540C						
	mg/L	mg/L		Analyst: RAS		Batch: 2224042
Total Dissolved Solids	1170	10.0	1	06/08/22	06/10/22	
Volatile Organics by EPA 8021B						
	ug/L	ug/L		Analyst: IY		Batch: 2224018
Benzene	ND	1.00	1	06/08/22	06/08/22	
Ethylbenzene	ND	1.00	1	06/08/22	06/08/22	
Toluene	ND	1.00	1	06/08/22	06/08/22	
o-Xylene	ND	1.00	1	06/08/22	06/08/22	
p,m-Xylene	ND	2.00	1	06/08/22	06/08/22	
Total Xylenes	ND	1.00	1	06/08/22	06/08/22	
Surrogate: 4-Bromochlorobenzene-PID	97.4 %	70-130		06/08/22	06/08/22	
Nonhalogenated Organics by EPA 8015D - GRO						
	mg/L	mg/L		Analyst: RKS		Batch: 2224018
Gasoline Range Organics (C6-C10)	ND	0.100	1	06/08/22	06/08/22	
Surrogate: 1-Chloro-4-fluorobenzene-FID	91.3 %	70-130		06/08/22	06/08/22	
Nonhalogenated Organics by EPA 8015D - DRO/ORO						
	mg/L	mg/L		Analyst: JL		Batch: 2224038
Diesel Range Organics (C10-C28)	ND	1.00	1	06/08/22	06/08/22	
Oil Range Organics (C28-C36)	ND	2.00	1	06/08/22	06/08/22	
Surrogate: n-Nonane	102 %	50-200		06/08/22	06/08/22	
Dissolved Metals by EPA 6010C						
	mg/L	mg/L		Analyst: RKS		Batch: 2224026
Calcium	218	1.00	1	06/08/22	06/08/22	
Iron	ND	2.00	1	06/08/22	06/08/22	
Magnesium	71.4	1.00	1	06/08/22	06/08/22	
Potassium	1.23	1.00	1	06/08/22	06/08/22	
Sodium	26.4	2.00	1	06/08/22	06/08/22	



Sample Data

EOG Resources	Project Name:	Achen Frey DM #11 Water Source Sample	
104 South 4th Street	Project Number:	19034-0009	Reported:
Artesia NM, 88210	Project Manager:	Greg Crabtree	6/10/2022 4:41:02PM

Source Water

E206046-01

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Anions by EPA 300.0/9056A	mg/L	mg/L	Analyst: KL		Batch: 2224041	
Fluoride	0.816	0.500	2	06/08/22	06/08/22	
Chloride	31.6	4.00	2	06/08/22	06/08/22	
Nitrite-N	ND	0.500	2	06/08/22 11:56	06/08/22 12:14	
Nitrate-N	0.545	0.500	2	06/08/22 11:56	06/08/22 12:14	
o-Phosphate-P	ND	0.500	2	06/08/22 11:56	06/08/22 12:14	
Sulfate	595	4.00	2	06/08/22	06/08/22	



QC Summary Data

EOG Resources	Project Name:	Achen Frey DM #11 Water Source Sample	Reported:
104 South 4th Street	Project Number:	19034-0009	
Artesia NM, 88210	Project Manager:	Greg Crabtree	6/10/2022 4:41:02PM

Wet Chem/Gravimetric by SM2540C

Analyst: RAS

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/L	mg/L	mg/L	mg/L	%	%	%	%	

Blank (2224042-BLK1)					Prepared: 06/08/22 Analyzed: 06/10/22				
Total Dissolved Solids	ND	10.0							
LCS (2224042-BS1)					Prepared: 06/08/22 Analyzed: 06/10/22				
Total Dissolved Solids	115	10.0	100		115	55-134			
Duplicate (2224042-DUP1)					Source: E206046-01 Prepared: 06/08/22 Analyzed: 06/10/22				
Total Dissolved Solids	1200	10.0		1170		2.86	5		



QC Summary Data

EOG Resources	Project Name:	Achen Frey DM #11 Water Source Sample	Reported:
104 South 4th Street	Project Number:	19034-0009	
Artesia NM, 88210	Project Manager:	Greg Crabtree	6/10/2022 4:41:02PM

Volatile Organics by EPA 8021B

Analyst: IY

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	ug/L	ug/L	ug/L	ug/L	%	%	%	%	

Blank (2224018-BLK1)

Prepared: 06/07/22 Analyzed: 06/07/22

Benzene	ND	1.00							
Ethylbenzene	ND	1.00							
Toluene	ND	1.00							
o-Xylene	ND	1.00							
p,m-Xylene	ND	2.00							
Total Xylenes	ND	1.00							
Surrogate: 4-Bromochlorobenzene-PID	154		160		95.9	70-130			

LCS (2224018-BS1)

Prepared: 06/07/22 Analyzed: 06/07/22

Benzene	102	1.00	100		102	70-130			
Ethylbenzene	92.5	1.00	100		92.5	70-130			
Toluene	98.1	1.00	100		98.1	70-130			
o-Xylene	96.1	1.00	100		96.1	70-130			
p,m-Xylene	191	2.00	200		95.4	70-130			
Total Xylenes	287	1.00	300		95.6	70-130			
Surrogate: 4-Bromochlorobenzene-PID	155		160		97.1	70-130			

Matrix Spike (2224018-MS1)

Source: E206027-01

Prepared: 06/07/22 Analyzed: 06/07/22

Benzene	545	5.00	500	17.4	106	54-133			
Ethylbenzene	508	5.00	500	21.5	97.3	61-133			
Toluene	531	5.00	500	23.8	101	61-130			
o-Xylene	518	5.00	500	23.0	99.0	63-131			
p,m-Xylene	1050	10.0	1000	58.4	99.2	63-131			
Total Xylenes	1570	5.00	1500	81.4	99.1	63-131			
Surrogate: 4-Bromochlorobenzene-PID	778		800		97.2	70-130			

Matrix Spike Dup (2224018-MSD1)

Source: E206027-01

Prepared: 06/07/22 Analyzed: 06/07/22

Benzene	555	5.00	500	17.4	108	54-133	1.90	20	
Ethylbenzene	517	5.00	500	21.5	99.2	61-133	1.82	20	
Toluene	541	5.00	500	23.8	103	61-130	1.84	20	
o-Xylene	528	5.00	500	23.0	101	63-131	1.94	20	
p,m-Xylene	1070	10.0	1000	58.4	101	63-131	1.70	20	
Total Xylenes	1600	5.00	1500	81.4	101	63-131	1.78	20	
Surrogate: 4-Bromochlorobenzene-PID	780		800		97.5	70-130			



QC Summary Data

EOG Resources	Project Name:	Achen Frey DM #11 Water Source Sample	Reported:
104 South 4th Street	Project Number:	19034-0009	
Artesia NM, 88210	Project Manager:	Greg Crabtree	6/10/2022 4:41:02PM

Nonhalogenated Organics by EPA 8015D - GRO

Analyst: IY

Analyte	Result mg/L	Reporting Limit mg/L	Spike Level mg/L	Source Result mg/L	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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LCS (2224018-BS2)

Prepared: 06/08/22 Analyzed: 06/08/22

Gasoline Range Organics (C6-C10)	1.04	0.100	1.00		104	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	0.147		0.160		91.8	70-130			

Matrix Spike (2224018-MS2)

Source: E206027-01

Prepared: 06/09/22 Analyzed: 06/09/22

Gasoline Range Organics (C6-C10)	10.8	0.500	5.00	5.62	104	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	0.708		0.800		88.4	70-130			

Matrix Spike Dup (2224018-MSD2)

Source: E206027-01

Prepared: 06/09/22 Analyzed: 06/09/22

Gasoline Range Organics (C6-C10)	10.5	0.500	5.00	5.62	98.5	70-130	2.46	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	0.704		0.800		88.0	70-130			



QC Summary Data

EOG Resources	Project Name:	Achen Frey DM #11 Water Source Sample	Reported:
104 South 4th Street	Project Number:	19034-0009	
Artesia NM, 88210	Project Manager:	Greg Crabtree	6/10/2022 4:41:02PM

Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: JL

Analyte	Result mg/L	Reporting Limit mg/L	Spike Level mg/L	Source Result mg/L	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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Blank (2224038-BLK1)

Prepared: 06/08/22 Analyzed: 06/09/22

Diesel Range Organics (C10-C28)	ND	1.00							
Oil Range Organics (C28-C36)	ND	2.00							
Surrogate: <i>n</i> -Nonane	2.12		2.50		84.8	50-200			

LCS (2224038-BS1)

Prepared: 06/08/22 Analyzed: 06/09/22

Diesel Range Organics (C10-C28)	13.1	1.00	12.5		104	36-132			
Surrogate: <i>n</i> -Nonane	2.72		2.50		109	50-200			

LCS Dup (2224038-BSD1)

Prepared: 06/08/22 Analyzed: 06/09/22

Diesel Range Organics (C10-C28)	7.03	1.00	12.5		56.3	36-132	60.0	20	R3
Surrogate: <i>n</i> -Nonane	2.69		2.50		108	50-200			



QC Summary Data

EOG Resources	Project Name:	Achen Frey DM #11 Water Source Sample	Reported:
104 South 4th Street	Project Number:	19034-0009	
Artesia NM, 88210	Project Manager:	Greg Crabtree	6/10/2022 4:41:02PM

Dissolved Metals by EPA 6010C

Analyst: RKS

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/L	mg/L	mg/L	mg/L	%	%	%	%	

Blank (2224026-BLK1)

Prepared: 06/08/22 Analyzed: 06/08/22

Calcium	ND	1.00
Iron	ND	2.00
Magnesium	ND	1.00
Potassium	ND	1.00
Sodium	ND	2.00

LCS (2224026-BS1)

Prepared: 06/08/22 Analyzed: 06/08/22

Calcium	52.2	1.00	50.0	104	80-120
Iron	106	2.00	100	106	80-120
Magnesium	52.0	1.00	50.0	104	80-120
Potassium	5.10	1.00	5.00	102	80-120
Sodium	18.5	2.00	20.0	92.6	80-120

LCS Dup (2224026-BSD1)

Prepared: 06/08/22 Analyzed: 06/08/22

Calcium	52.1	1.00	50.0	104	80-120	0.307	20
Iron	104	2.00	100	104	80-120	1.72	20
Magnesium	50.0	1.00	50.0	99.9	80-120	3.96	20
Potassium	4.93	1.00	5.00	98.6	80-120	3.37	20
Sodium	17.9	2.00	20.0	89.5	80-120	3.40	20



QC Summary Data

EOG Resources	Project Name:	Achen Frey DM #11 Water Source Sample	Reported:
104 South 4th Street	Project Number:	19034-0009	
Artesia NM, 88210	Project Manager:	Greg Crabtree	6/10/2022 4:41:02PM

Anions by EPA 300.0/9056A

Analyst: KL

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/L	mg/L	mg/L	mg/L	%	%	%	%	

Blank (2224041-BLK1)

Prepared: 06/08/22 Analyzed: 06/08/22

Fluoride	ND	0.250
Chloride	ND	2.00
Nitrite-N	ND	0.250
Nitrate-N	ND	0.250
o-Phosphate-P	ND	0.250
Sulfate	ND	2.00

LCS (2224041-BS1)

Prepared: 06/08/22 Analyzed: 06/08/22

Fluoride	2.57	0.250	2.50	103	90-110
Chloride	24.7	2.00	25.0	98.9	90-110
Nitrite-N	2.58	0.250	2.50	103	90-110
Nitrate-N	2.55	0.250	2.50	102	90-110
o-Phosphate-P	12.3	0.250	12.5	98.6	90-110
Sulfate	24.7	2.00	25.0	98.7	90-110

LCS Dup (2224041-BSD1)

Prepared: 06/08/22 Analyzed: 06/08/22

Fluoride	2.59	0.250	2.50	103	90-110	0.496	20
Chloride	24.8	2.00	25.0	99.3	90-110	0.320	20
Nitrite-N	2.58	0.250	2.50	103	90-110	0.0310	20
Nitrate-N	2.56	0.250	2.50	102	90-110	0.336	20
o-Phosphate-P	12.4	0.250	12.5	99.0	90-110	0.437	20
Sulfate	24.8	2.00	25.0	99.0	90-110	0.334	20

QC Summary Report Comment:

Calculations are based off of the raw (non-rounded) data. However, for reporting purposes all QC data is rounded to three significant figures. Therefore, hand calculated values may differ slightly.



Definitions and Notes

EOG Resources	Project Name:	Achen Frey DM #11 Water Source Sample	
104 South 4th Street	Project Number:	19034-0009	Reported:
Artesia NM, 88210	Project Manager:	Greg Crabtree	06/10/22 16:41

- R3 The RPD exceeded the acceptance limit. LCS spike recovery met acceptance criteria.
- ND Analyte NOT DETECTED at or above the reporting limit
- NR Not Reported
- RPD Relative Percent Difference
- DNI Did Not Ignite

Note (1): Methods marked with ** are non-accredited methods.

Note (2): Soil data is reported on an "as received" weight basis, unless reported otherwise.

[illegible]

Envirotech Analytical Laboratory

Printed: 6/9/2022 2:48:23PM

Sample Receipt Checklist (SRC)

Instructions: Please take note of any NO checkmarks.

If we receive no response concerning these items within 24 hours of the date of this notice, all the samples will be analyzed as requested.

Client:	EOG Resources	Date Received:	06/08/22 10:00	Work Order ID:	E206046
Phone:	(575) 748-4217	Date Logged In:	06/08/22 09:14	Logged In By:	Caitlin Christian
Email:		Due Date:	06/09/22 17:00 (1 day TAT)		

Chain of Custody (COC)

1. Does the sample ID match the COC? Yes
2. Does the number of samples per sampling site location match the COC? Yes
3. Were samples dropped off by client or carrier? Yes
4. Was the COC complete, i.e., signatures, dates/times, requested analyses? Yes
5. Were all samples received within holding time? Yes

Note: Analysis, such as pH which should be conducted in the field, i.e., 15 minute hold time, are not included in this discussion.

Carrier: UPSComments/ResolutionSample Turn Around Time (TAT)

6. Did the COC indicate standard TAT, or Expedited TAT? Yes

Sample Cooler

7. Was a sample cooler received? Yes
8. If yes, was cooler received in good condition? Yes
9. Was the sample(s) received intact, i.e., not broken? Yes
10. Were custody/security seals present? No
11. If yes, were custody/security seals intact? NA
12. Was the sample received on ice? If yes, the recorded temp is 4°C, i.e., 6°±2°C? Yes

Note: Thermal preservation is not required, if samples are received w/i 15 minutes of sampling

13. If no visible ice, record the temperature. Actual sample temperature: 4°C

Sample Container

14. Are aqueous VOC samples present? Yes
15. Are VOC samples collected in VOA Vials? Yes
16. Is the head space less than 6-8 mm (pea sized or less)? Yes
17. Was a trip blank (TB) included for VOC analyses? No
18. Are non-VOC samples collected in the correct containers? Yes
19. Is the appropriate volume/weight or number of sample containers collected? Yes

Field Label

20. Were field sample labels filled out with the minimum information:
 - Sample ID? Yes
 - Date/Time Collected? Yes
 - Collectors name? Yes

Sample Preservation

21. Does the COC or field labels indicate the samples were preserved? Yes
22. Are sample(s) correctly preserved? Yes
24. Is lab filtration required and/or requested for dissolved metals? Yes

Multiphase Sample Matrix

26. Does the sample have more than one phase, i.e., multiphase? No
27. If yes, does the COC specify which phase(s) is to be analyzed? NA

Subcontract Laboratory

28. Are samples required to get sent to a subcontract laboratory? No
29. Was a subcontract laboratory specified by the client and if so who? NA Subcontract Lab: na

Client Instruction

Signature of client authorizing changes to the COC or sample disposition.

Date



envirotech Inc.

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1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
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Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 123185

CONDITIONS

Operator: EOG RESOURCES INC P.O. Box 2267 Midland, TX 79702	OGRID: 7377
	Action Number: 123185
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
bbillings	Addendum received for work plan.	7/11/2022