

From: [Yu, Olivia, EMNRD](#)
To: ["Bob Asher"](#)
Subject: RE: Characterization Plan (Judson AUU State Com #2)
Date: Friday, December 29, 2017 10:52:00 AM
Attachments: image001.png

Dear Mr. Asher:

Please address these concerns regarding the delineation workplan for 1RP-4826:

- Please be advised that in general, stockpiled blended soil for use as backfill is not an acceptable NMOCD remedial activity. Also, delineating while remediating is considered conducted at risk.
- What was the depth of excavation comprising the immediate response? In other words, will the first delineation samples be taken at 1 ft. depth bgs, as indicated on page 1, actually the current surface?
- The figures showed only one sample location within the release area. Please note that more than one sample location for delineation may be necessary.
- Due to the depth to groundwater, laboratory analyses must demonstrate at least two depths (depth obtained and depth maintained at least 2 ft further in depth) with permissible levels of BTEX and TPH extended. A portion of the samples must be submitted for laboratory analysis of chloride concentrations using EPA Method 300.
- If the sidewall or NE/NW excavation corner samples are above permissible levels, delineation must be extended laterally.
- All laboratory analyses should have accompanying field data.

Please confirm or inform for clarification.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
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.

From: Bob Asher [mailto:Bob_Asher@eogresources.com]
Sent: Monday, December 11, 2017 4:08 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

Subject: RE: Characterization Plan (Judson AUU State Com #2)

Thank you,

Robert C. “Bob” Asher

Environmental Supervisor

Safety & Environmental Department

EOG Resources, Inc.

Artesia Division

EOG Safety Begins With YOUR Safety



From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]

Sent: Friday, December 8, 2017 9:47 AM

To: Bob Asher <Bob_Asher@eogresources.com>

Subject: RE: Characterization Plan (Judson AUU State Com #2)

****External email. Use caution.****

Mr. Asher:

The document was also incomplete.

Thanks,

Olivia

From: Bob Asher [mailto:Bob_Asher@eogresources.com]

Sent: Friday, November 10, 2017 2:43 PM

To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Billings, Bradford, EMNRD
<Bradford.Billings@state.nm.us>

Subject: Characterization Plan (Judson AUU State Com #2)

Thank you,

Robert C. “Bob” Asher

Environmental Supervisor

Safety & Environmental Department

EOG Resources, Inc.

Artesia Division

Artesia, NM 88210

575-748-4217 (Office)

575-365-4021 (Cell)

EOG Safety Begins With YOUR Safety

