

Closure Report

Site Description

Site Name:	Neff Federal #1 & #3 SWD Battery
Company:	Oxy Permian Ltd.
Legal Description:	NW ¼, Section 25, T22S, R31E
County:	Eddy County, NM
GPS Coordinates:	N 32.36754° W 103.73356°

Release Data

Date of Release:	03/17/2014
Type of Release:	Oil and produced water
Source of Release:	High winds caused power pole trip which lead to tank spill
Volume of Release:	4 bbls oil, 400 bbls produced water
Volume Recovered:	400 bbls

Remediation Specifications

Remediation Parameters:	Excavate to a depth of 6" in the areas of SP1 & SP2. Obtain a bottom confirmation sample at SP2. Excavate 3'-4' in the area around SP3 & install a liner in this area. Excavate to a depth of 1' in the area of SP4. Clean the liner inside the battery. Backfill excavated areas with clean soil.
Remediation Activities:	11/19/2014 to 12/15/2014

Plan Sent to OCD:	08/14/2014	Email from Cliff Brunson to Heather Patterson
OCD Approval of Plan:	08/20/2014	Email from Heather Patterson to Cliff Brunson
Plan Sent to BLM:	08/28/2014	Email from Cliff Brunson to Sol Hughes
BLM Approval of Plan:	08/29/2014	Email from Sol Hughes to Cliff Brunson

Supporting Documentation

Initial C-141	Signed 03/18/2014
Final C-141	Signed 01/07/2015
Site Diagram	March 2014
Groundwater Plot	175'-200'
TOPO Maps	March 2014
Lab Summary	04/18/2014-04/21/2014 and 11/26/2014
Lab Analysis	04/18/2014-04/21/2014 and 11/26/2014
Correspondence	Request and approval of remediation plan via email

Request for Closure

Based on the completion of the remediation plan as agreed upon, BBC International requests closure approval from NMOCD.

Cliff Brunson, President of BBC International Inc.

01/08/2015

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

Form C-141
Revised August 8, 2011

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

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company	Oxy Permian Ltd.	Contact	Chancey Summers
Address	1017 W. Stanolind Rd, Hobbs, NM 88240	Telephone No.	(575) 397-8216
Facility Name	Neff Federal #1 and #3 SWD Battery	Facility Type	Battery
Surface Owner	BLM	Mineral Owner	API No.30-015-28281(nearest well)

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
	25	22S	31E					Eddy County, NM

Latitude N 32.367782° Longitude W 103.733851°

NATURE OF RELEASE

Type of Release	Oil and Produced water	Volume of Release	4 bbls oil, 400 bbls produced water	Volume Recovered	400 bbls
Source of Release	High winds caused power pole trip which lead to the tanks spilling over	Date and Hour of Occurrence	03/17/2014	Date and Hour of Discovery	
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Mike Bratcher, NMOCD and Jennifer VanCuren, BLM		
By Whom?	Kathy Purvis, BBC International	Date and Hour	03/18/2014 @ 9:24 am		
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.*

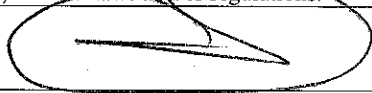
Describe Cause of Problem and Remedial Action Taken.*

High winds caused the power pole line fuse to trip which lead to the tanks overflowing and spilling 400 bbls of produced water and 4 bbls of oil onto the ground. A vacuum truck recovered 400 bbls of fluids and the power was restored to the battery location.

Describe Area Affected and Cleanup Action Taken.*

The affected area is 20' x 60' inside the containment area and 15' x 20' outside the containment area. Remediation will be completed in accordance with a remediation plan approved by NMOCD and the BLM.

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: 	OIL CONSERVATION DIVISION		
Printed Name: Chancey Summers	Approved by Environmental Specialist:		
Title: HES Specialist	Approval Date:	Expiration Date:	
E-mail Address: <u>Chancey.Summers@oxy.com</u>	Conditions of Approval:		Attached <input type="checkbox"/>
Date: <u>3-18-14</u> Phone: (575) 397-8216			

* Attach Additional Sheets If Necessary

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Facility Name	Neff Federal #1 and #3 SWD Battery	Facility Type	Battery
Surface Owner	BLM	Mineral Owner	API No.30-015-28281(nearest well)

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
	25	22S	31E					Eddy County, NM

Latitude N 32.367782° Longitude W 103.733851°

NATURE OF RELEASE

Type of Release	Oil and Produced water	Volume of Release	4 bbls oil, 400 bbls produced water	Volume Recovered	400 bbls
Source of Release	High winds caused power pole trip which lead to the tanks spilling over	Date and Hour of Occurrence	03/17/2014	Date and Hour of Discovery	
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Mike Bratcher, NMOCD and Jennifer VanCuren, BLM		
By Whom?	Kathy Purvis, BBC International	Date and Hour	03/18/2014 @ 9:24 am		
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.*

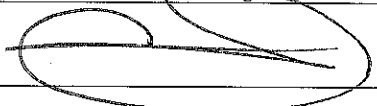
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The affected area is 20' x 60' inside the containment area and 15' x 20' outside the containment area. Remediation was completed in accordance with the remediation plan approved by Heather Patterson of NMOCD 08/20/2014 and approved by Sol Hughes of the BLM via email on 08/29/2014.

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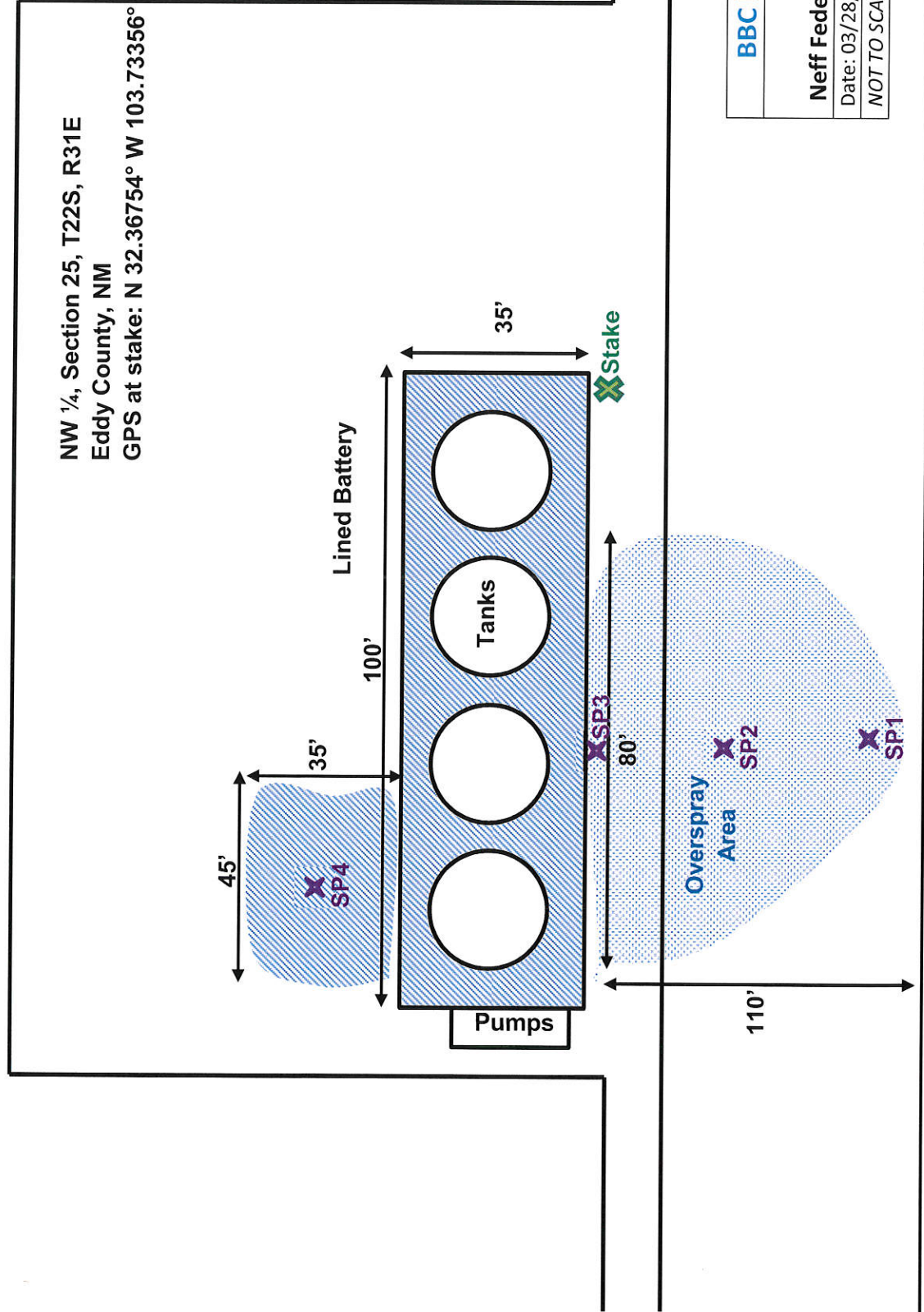
Signature: 	OIL CONSERVATION DIVISION		
Printed Name: Chancey Summers	Approved by Environmental Specialist:		
Title: HES Specialist	Approval Date:	Expiration Date:	
E-mail Address: <u>Chancey.Summers@oxy.com</u>	Conditions of Approval:		Attached <input type="checkbox"/>
Date: <u>1-7-15</u>	Phone: (575) 397-8216		

* Attach Additional Sheets If Necessary



Oxy

Neff Federal #1 and #3 SWD Battery



BBC International, Inc.

Oxy

Neff Federal #1 & #3 SWD Battery

Date: 03/28/14 DRWG by: K. Purvis

NOT TO SCALE File: Oxy 2014



Groundwater Plot

Oxy Neff Federal #1 & #3 SWD Battery

County
Eddy

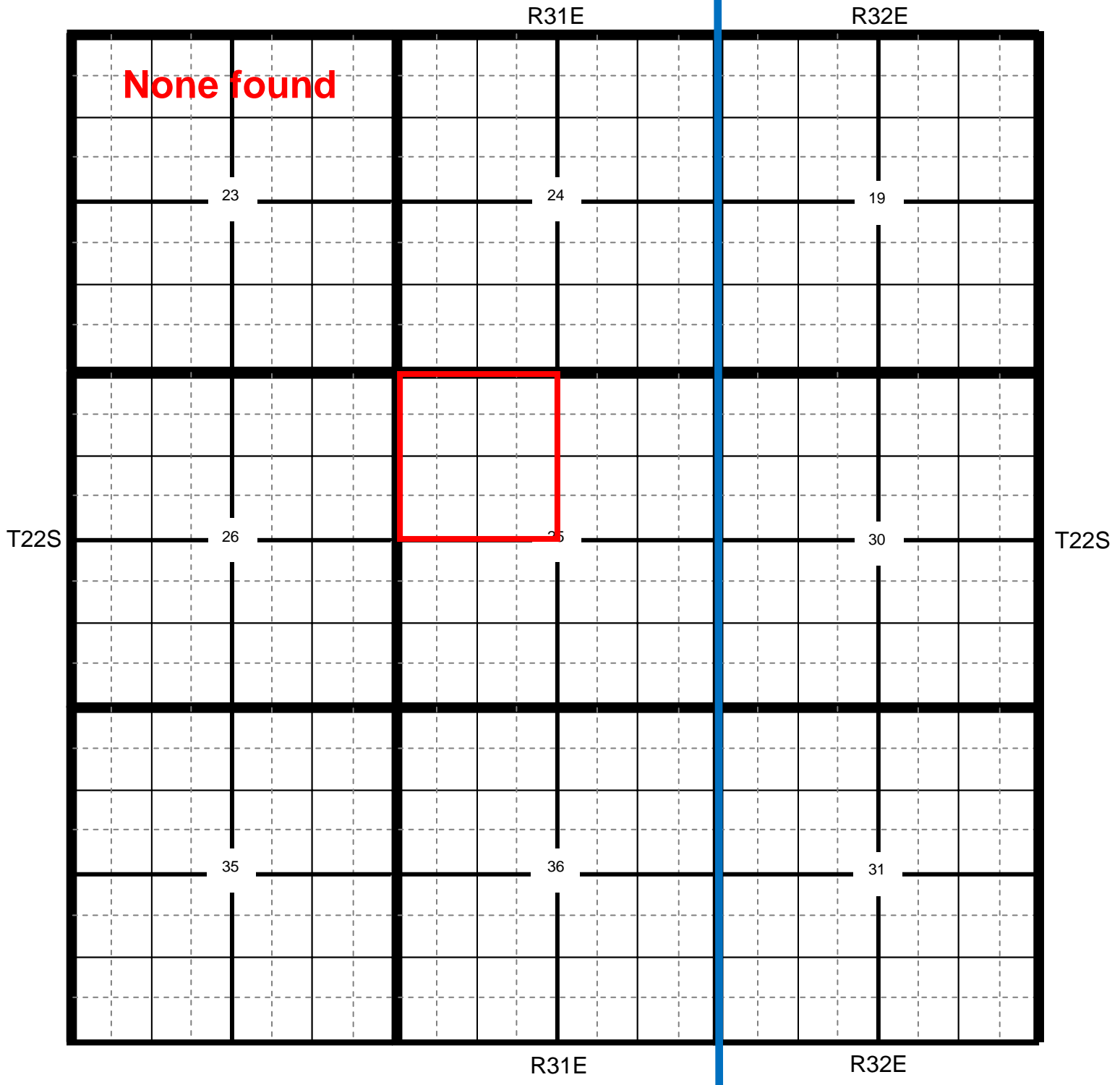
Unit Letter
NW ¼

Section
25

Township
22S

Range
31E

Trend Map 175'-200'



Location

OCD

USGS

SEO

All Databases

Oxy Neff Federal #1 & #3 SWD Battery

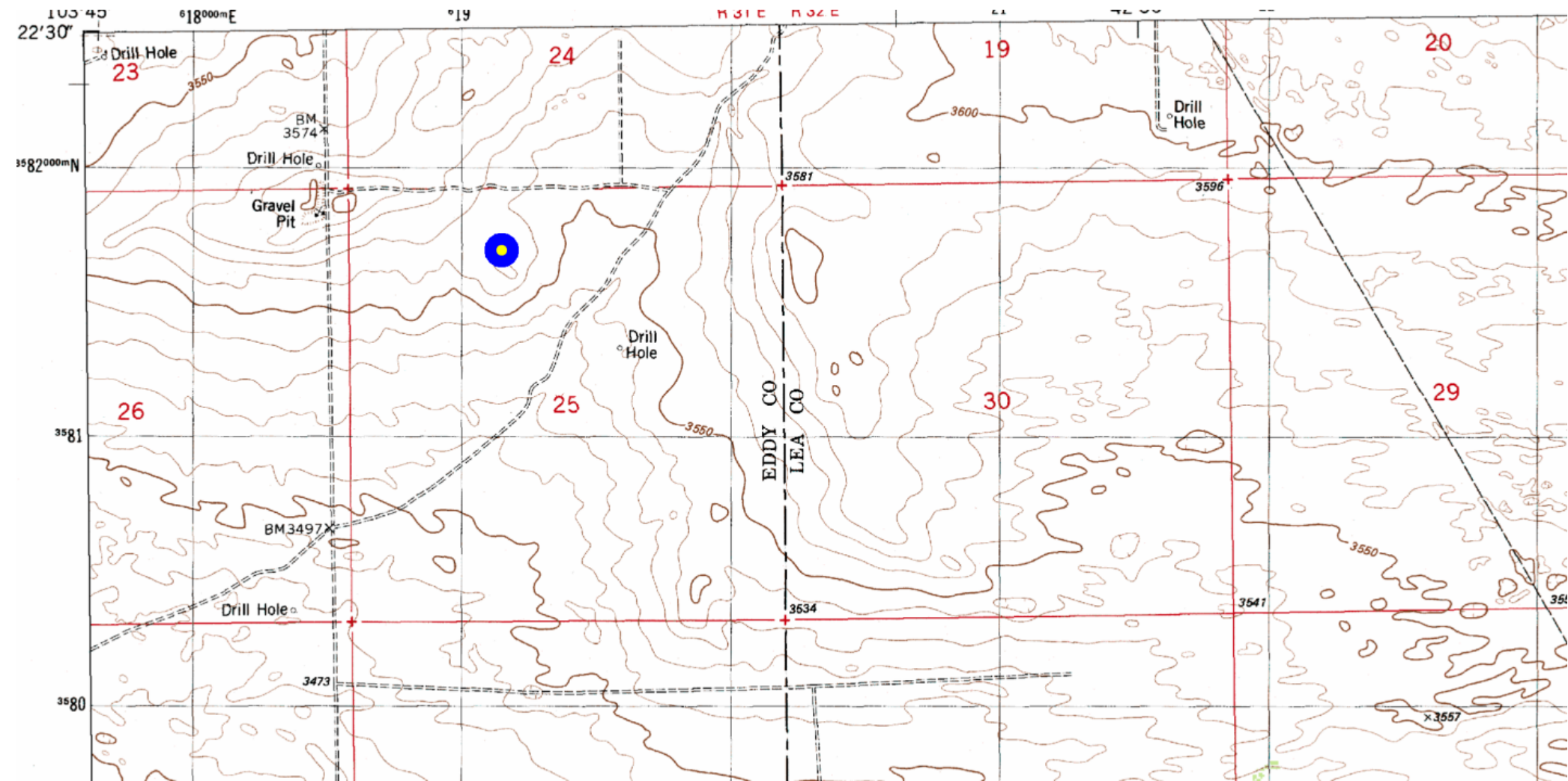
County Eddy **Unit Letter** NW ¼ **Section** 25 **Township** 22S **Range** 31E

Trend Map 175'-200'

1		2	
NW/NW	NE/NW	NW/NE	NE/NE
Unit Letter D	Unit Letter C	Unit Letter B	Unit Letter A
SW/NW	SE/NW	SW/NE	SE/NE
Unit Letter E	Unit Letter F	Unit Letter G	Unit Letter H
NW/SW	NE/SW	NW/SE	NE/SE
Unit Letter L	Unit Letter K	Unit Letter J	Unit Letter I
SW/SW	SE/SW	SW/SE	SE/SE
Unit Letter M	Unit Letter N	Unit Letter O	Unit Letter P
3		4	

None found

Neff Fed #1 & #3 SWD Btry



**Laboratory Analytical Results Summary
Neff Federal #1 and #3 SWD Battery**

		Sample	SP1 @ SURFACE	SP1 @ 1'
Analyte	Method	Date	4/18/14	4/18/14
			mg/Kg	mg/Kg
Benzene	BTEX 8021B		n/a	<0.050
Toluene	BTEX 8021B		n/a	<0.050
Ethylbenzene	BTEX 8021B		n/a	<0.050
Total Xylenes	BTEX 8021B		n/a	<0.150
Total BTEX	BTEX 8021B		n/a	<0.300
Chloride	SM4500Cl-B		384	<16.0
GRO	TPH 8015M		n/a	<10.0
DRO	TPH 8015M		n/a	<10.0

		Sample	SP2 @ SURFACE	SP2 @ 1'
Analyte	Method	Date	4/18/14	4/18/14
			mg/Kg	mg/Kg
Benzene	BTEX 8021B		n/a	<0.050
Toluene	BTEX 8021B		n/a	<0.050
Ethylbenzene	BTEX 8021B		n/a	<0.050
Total Xylenes	BTEX 8021B		n/a	<0.150
Total BTEX	BTEX 8021B		n/a	<0.300
Chloride	SM4500Cl-B		1230	80
GRO	TPH 8015M		n/a	<10.0
DRO	TPH 8015M		n/a	<10.0

		Sample	SP3 @ SURFACE	SP3 @ 1'	SP3 @ 3'	SP3 @ 6'	SP3 @ 9'	SP3 @ 12'	SP3 @ 14'
Analyte	Method	Date	4/18/14	4/18/14	4/18/14	4/21/14	4/21/14	4/21/14	4/21/14
			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.200	<0.050	<0.050	n/a	n/a	n/a	n/a
Toluene	BTEX 8021B		<0.200	<0.050	<0.050	n/a	n/a	n/a	n/a
Ethylbenzene	BTEX 8021B		<0.200	<0.050	<0.050	n/a	n/a	n/a	n/a
Total Xylenes	BTEX 8021B		<0.600	<0.150	<0.150	n/a	n/a	n/a	n/a
Total BTEX	BTEX 8021B		<1.20	<0.300	<0.300	n/a	n/a	n/a	n/a
Chloride	SM4500Cl-B		9860	192	10800	2000	2800	2000	240
GRO	TPH 8015M		<200	<10.0	<10.0	n/a	n/a	n/a	n/a
DRO	TPH 8015M		12800	<10.0	35.1	n/a	n/a	n/a	n/a

		Sample	SP4 @ SURFACE	SP4 @ 1'	SP4 @ 3'	SP4 @ 5'
Analyte	Method	Date	4/18/14	4/18/14	4/18/14	4/21/14
			mg/Kg	mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.200	<0.050	<0.050	n/a
Toluene	BTEX 8021B		<0.200	<0.050	<0.050	n/a
Ethylbenzene	BTEX 8021B		<0.200	<0.050	<0.050	n/a
Total Xylenes	BTEX 8021B		<0.600	<0.150	<0.150	n/a
Total BTEX	BTEX 8021B		<1.20	<0.300	<0.300	n/a
Chloride	SM4500Cl-B		10900	448	784	176
GRO	TPH 8015M		<200	<10.0	<10.0	n/a
DRO	TPH 8015M		14700	<10.0	<10.0	n/a

Laboratory Analytical Results Summary
Neff Federal #1 #3 SWD Battery

Confirmation		Sample	SP2 @ 6"
Analyte	Method	Date	11/26/14
			mg/Kg
Benzene	BTEX 8021B		<0.050
Toluene	BTEX 8021B		<0.050
Ethylbenzene	BTEX 8021B		<0.050
Total Xylenes	BTEX 8021B		<0.150
Total BTEX	BTEX 8021B		<0.300
Chloride	SM4500Cl-B		<16.0
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		<10.0



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

May 01, 2014

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: NEFF FEDERAL #1 & #3 SWD BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 04/24/14 12:03.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

BBC International, Inc.
Cliff Brunson
P.O. Box 805
Hobbs NM, 88241
Fax To: (575) 397-0397

Received:	04/24/2014	Sampling Date:	04/18/2014
Reported:	05/01/2014	Sampling Type:	Soil
Project Name:	NEFF FEDERAL #1 & #3 SWD BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	EDDY COUNTY, NM		

Sample ID: SP 1 @ SURFACE (H401235-01)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	384	16.0	04/25/2014	ND	416	104	400	0.00	

Sample ID: SP 1 @ 1' (H401235-02)

BTEX 8260B		mg/kg		Analyzed By: ck					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/29/2014	ND	2.35	118	2.00	6.15	
Toluene*	<0.050	0.050	04/29/2014	ND	2.13	106	2.00	8.09	
Ethylbenzene*	<0.050	0.050	04/29/2014	ND	2.03	102	2.00	7.15	
Total Xylenes*	<0.150	0.150	04/29/2014	ND	6.25	104	6.00	8.15	
Total BTEX	<0.300	0.300	04/29/2014	ND					

Surrogate: Dibromofluoromethane 96.2 % 61.3-142

Surrogate: Toluene-d8 99.8 % 71.3-129

Surrogate: 4-Bromofluorobenzene 101 % 65.7-141

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	04/25/2014	ND	416	104	400	0.00		

TPH 8015M		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	04/25/2014	ND	186	92.9	200	11.1	
DRO >C10-C28	<10.0	10.0	04/25/2014	ND	207	103	200	12.5	

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

BBC International, Inc.
Cliff Brunson
P.O. Box 805
Hobbs NM, 88241
Fax To: (575) 397-0397

Received:	04/24/2014	Sampling Date:	04/18/2014
Reported:	05/01/2014	Sampling Type:	Soil
Project Name:	NEFF FEDERAL #1 & #3 SWD BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	EDDY COUNTY, NM		

Sample ID: SP 1 @ 1' (H401235-02)

TPH 8015M		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Surrogate: 1-Chlorooctane	111 %	65.2-140							
Surrogate: 1-Chlorooctadecane	108 %	63.6-154							

Sample ID: SP 2 @ SURFACE (H401235-03)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1230	16.0	04/25/2014	ND	416	104	400	0.00	

Cardinal Laboratories

*=Accredited Analyte

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Reported:	05/01/2014	Sampling Type:	Soil
Project Name:	NEFF FEDERAL #1 & #3 SWD BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	EDDY COUNTY, NM		

Sample ID: SP 2 @ 1' (H401235-04)

BTX 8260B		mg/kg		Analyzed By: ck						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	04/29/2014	ND	2.35	118	2.00	6.15		
Toluene*	<0.050	0.050	04/29/2014	ND	2.13	106	2.00	8.09		
Ethylbenzene*	<0.050	0.050	04/29/2014	ND	2.03	102	2.00	7.15		
Total Xylenes*	<0.150	0.150	04/29/2014	ND	6.25	104	6.00	8.15		
Total BTX	<0.300	0.300	04/29/2014	ND						

Surrogate: Dibromofluoromethane 101 % 61.3-142
Surrogate: Toluene-d8 102 % 71.3-129
Surrogate: 4-Bromofluorobenzene 103 % 65.7-141

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	80.0	16.0	04/25/2014	ND	416	104	400	0.00		

TPH 8015M		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	04/25/2014	ND	187	93.6	200	2.79	
DRO >C10-C28	<10.0	10.0	04/25/2014	ND	202	101	200	2.79	

Surrogate: 1-Chlorooctane 114 % 65.2-140
Surrogate: 1-Chlorooctadecane 110 % 63.6-154

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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BBC International, Inc.
Cliff Brunson
P.O. Box 805
Hobbs NM, 88241
Fax To: (575) 397-0397

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Reported:	05/01/2014	Sampling Type:	Soil
Project Name:	NEFF FEDERAL #1 & #3 SWD BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	EDDY COUNTY, NM		

Sample ID: SP 3 @ SURFACE (H401235-05)

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.200	0.200	04/30/2014	ND	2.06	103	2.00	5.94	
Toluene*	<0.200	0.200	04/30/2014	ND	2.06	103	2.00	6.37	
Ethylbenzene*	<0.200	0.200	04/30/2014	ND	2.06	103	2.00	6.68	
Total Xylenes*	<0.600	0.600	04/30/2014	ND	6.18	103	6.00	6.99	
Total BTX	<1.20	1.20	04/30/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 119 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	9860	16.0	04/25/2014	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: CK					S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<200	200	04/25/2014	ND	187	93.6	200	2.79		
DRO >C10-C28	12800	200	04/25/2014	ND	202	101	200	2.79		

Surrogate: 1-Chlorooctane 100 % 65.2-140

Surrogate: 1-Chlorooctadecane 425 % 63.6-154

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

BBC International, Inc.
Cliff Brunson
P.O. Box 805
Hobbs NM, 88241
Fax To: (575) 397-0397

Received:	04/24/2014	Sampling Date:	04/18/2014
Reported:	05/01/2014	Sampling Type:	Soil
Project Name:	NEFF FEDERAL #1 & #3 SWD BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	EDDY COUNTY, NM		

Sample ID: SP 3 @ 1' (H401235-06)

BTX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	04/30/2014	ND	2.06	103	2.00	5.94		
Toluene*	<0.050	0.050	04/30/2014	ND	2.06	103	2.00	6.37		
Ethylbenzene*	<0.050	0.050	04/30/2014	ND	2.06	103	2.00	6.68		
Total Xylenes*	<0.150	0.150	04/30/2014	ND	6.18	103	6.00	6.99		
Total BTX	<0.300	0.300	04/30/2014	ND						

Surrogate: 4-Bromofluorobenzene (PID) 108 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	192	16.0	04/25/2014	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	04/25/2014	ND	187	93.6	200	2.79	
DRO >C10-C28	<10.0	10.0	04/25/2014	ND	202	101	200	2.79	

Surrogate: 1-Chlorooctane 113 % 65.2-140

Surrogate: 1-Chlorooctadecane 111 % 63.6-154

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

BBC International, Inc.
Cliff Brunson
P.O. Box 805
Hobbs NM, 88241
Fax To: (575) 397-0397

Received:	04/24/2014	Sampling Date:	04/18/2014
Reported:	05/01/2014	Sampling Type:	Soil
Project Name:	NEFF FEDERAL #1 & #3 SWD BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	EDDY COUNTY, NM		

Sample ID: SP 3 @ 3' (H401235-07)

BTX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	04/30/2014	ND	2.06	103	2.00	5.94		
Toluene*	<0.050	0.050	04/30/2014	ND	2.06	103	2.00	6.37		
Ethylbenzene*	<0.050	0.050	04/30/2014	ND	2.06	103	2.00	6.68		
Total Xylenes*	<0.150	0.150	04/30/2014	ND	6.18	103	6.00	6.99		
Total BTX	<0.300	0.300	04/30/2014	ND						

Surrogate: 4-Bromofluorobenzene (PID) 112 % 89.4-126

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	10800	16.0	04/25/2014	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	04/25/2014	ND	187	93.6	200	2.79	
DRO >C10-C28	35.1	10.0	04/25/2014	ND	202	101	200	2.79	

Surrogate: 1-Chlorooctane 110 % 65.2-140

Surrogate: 1-Chlorooctadecane 108 % 63.6-154

Sample ID: SP 3 @ 6' (H401235-08)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	2000	16.0	04/25/2014	ND	416	104	400	0.00		

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

 BBC International, Inc.
 Cliff Brunson
 P.O. Box 805
 Hobbs NM, 88241
 Fax To: (575) 397-0397

Received:	04/24/2014	Sampling Date:	04/21/2014
Reported:	05/01/2014	Sampling Type:	Soil
Project Name:	NEFF FEDERAL #1 & #3 SWD BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	EDDY COUNTY, NM		

Sample ID: SP 3 @ 9' (H401235-09)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	2800	16.0	04/25/2014	ND	416	104	400	0.00		

Sample ID: SP 3 @ 12' (H401235-10)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2000	16.0	04/25/2014	ND	432	108	400	3.64	

Sample ID: SP 3 @ 14' (H401235-11)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	240	16.0	04/25/2014	ND	416	104	400	0.00	

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

BBC International, Inc.
Cliff Brunson
P.O. Box 805
Hobbs NM, 88241
Fax To: (575) 397-0397

Received:	04/24/2014	Sampling Date:	04/21/2014
Reported:	05/01/2014	Sampling Type:	Soil
Project Name:	NEFF FEDERAL #1 & #3 SWD BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	EDDY COUNTY, NM		

Sample ID: SP 4 @ SURFACE (H401235-12)

BTX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.200	0.200	04/30/2014	ND	2.06	103	2.00	5.94		
Toluene*	<0.200	0.200	04/30/2014	ND	2.06	103	2.00	6.37		
Ethylbenzene*	<0.200	0.200	04/30/2014	ND	2.06	103	2.00	6.68		
Total Xylenes*	<0.600	0.600	04/30/2014	ND	6.18	103	6.00	6.99		
Total BTX	<1.20	1.20	04/30/2014	ND						

Surrogate: 4-Bromofluorobenzene (PID) 117 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	10900	16.0	04/25/2014	ND	432	108	400	3.64		

TPH 8015M		mg/kg		Analyzed By: CK				S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<200	200	04/25/2014	ND	187	93.6	200	2.79	
DRO >C10-C28	14700	200	04/25/2014	ND	202	101	200	2.79	

Surrogate: 1-Chlorooctane 93.3 % 65.2-140

Surrogate: 1-Chlorooctadecane 477 % 63.6-154

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

 BBC International, Inc.
 Cliff Brunson
 P.O. Box 805
 Hobbs NM, 88241
 Fax To: (575) 397-0397

Received:	04/24/2014	Sampling Date:	04/21/2014
Reported:	05/01/2014	Sampling Type:	Soil
Project Name:	NEFF FEDERAL #1 & #3 SWD BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	EDDY COUNTY, NM		

Sample ID: SP 4 @ 1' (H401235-13)

BTEx 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/30/2014	ND	2.06	103	2.00	5.94	
Toluene*	<0.050	0.050	04/30/2014	ND	2.06	103	2.00	6.37	
Ethylbenzene*	<0.050	0.050	04/30/2014	ND	2.06	103	2.00	6.68	
Total Xylenes*	<0.150	0.150	04/30/2014	ND	6.18	103	6.00	6.99	
Total BTEx	<0.300	0.300	04/30/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 112 % 89.4-126

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	448	16.0	04/25/2014	ND	432	108	400	3.64	

TPH 8015M		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	04/25/2014	ND	187	93.6	200	2.79	
DRO >C10-C28	<10.0	10.0	04/25/2014	ND	202	101	200	2.79	

Surrogate: 1-Chlorooctane 112 % 65.2-140

Surrogate: 1-Chlorooctadecane 107 % 63.6-154

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

BBC International, Inc.
Cliff Brunson
P.O. Box 805
Hobbs NM, 88241
Fax To: (575) 397-0397

Received:	04/24/2014	Sampling Date:	04/22/2014
Reported:	05/01/2014	Sampling Type:	Soil
Project Name:	NEFF FEDERAL #1 & #3 SWD BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	EDDY COUNTY, NM		

Sample ID: SP 4 @ 3' (H401235-14)

BTX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	04/30/2014	ND	2.06	103	2.00	5.94		
Toluene*	<0.050	0.050	04/30/2014	ND	2.06	103	2.00	6.37		
Ethylbenzene*	<0.050	0.050	04/30/2014	ND	2.06	103	2.00	6.68		
Total Xylenes*	<0.150	0.150	04/30/2014	ND	6.18	103	6.00	6.99		
Total BTX	<0.300	0.300	04/30/2014	ND						

Surrogate: 4-Bromofluorobenzene (PID) 110 % 89.4-126

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	784	16.0	04/25/2014	ND	432	108	400	3.64	

TPH 8015M		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	04/25/2014	ND	187	93.6	200	2.79	
DRO >C10-C28	<10.0	10.0	04/25/2014	ND	202	101	200	2.79	

Surrogate: 1-Chlorooctane 117 % 65.2-140

Surrogate: 1-Chlorooctadecane 111 % 63.6-154

Sample ID: SP 4 @ 5' (H401235-15)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	04/25/2014	ND	432	108	400	3.64	

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

S-06	The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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Celey D. Keene, Lab Director/Quality Manager



CARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240
(505) 393-2326 FAX (505) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

287

Company Name: BBC International, Inc.

Project Manager: Cliff Brunson

Address: P.O. Box 805

City: Hobbs

Phone #: 575-397-6388

Project #:

Project Name: Neff Federal #1 & #3 SWD Btry

Project Location: Eddy County, NM

Sampler Name: Jeff Ornelas

P.O. #:

Company:

Attn:

Address:

City:

State: Zip:

Phone #:

Fax #:

BILL TO

ANALYSIS REQUEST

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX					DATE	TIME	ANALYSIS REQUEST									
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :											
11	SP3 @ 14' -		1							4/21/14	1:49 PM	✓	✓	✓						
12	SP4 @ SURFACE -		1							4/21/14	2:19 PM	✓	✓	✓						
13	SP4 @ 1' -		1							4/21/14	2:38 PM	✓	✓	✓						
14	SP4 @ 3' -		1							4/22/14	8:41 AM	✓	✓	✓						
15	SP4 @ 5' -		1							4/22/14	9:47 AM	✓	✓	✓						
<div>LAB 4/24/14</div>																				

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Relinquished By:

Received By:

Phone Result: ☐ Yes ☐ No Add'l Phone #:
Fax Result: ☐ Yes ☐ No Add'l Fax #:

REMARKS:

Relinquished By:

Received By:

Delivered By: (Circle One)

Sampler - UPS - Bus - Other:

Sample Condition

Cool ☐ Intact ☐

Checked By: (Initials)

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

#54



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

December 04, 2014

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: NEFF FEDERAL #1 & #3 SWD BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 11/26/14 17:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

BBC International, Inc.
Cliff Brunson
P.O. Box 805
Hobbs NM, 88241
Fax To: (575) 397-0397

Received:	11/26/2014	Sampling Date:	11/26/2014
Reported:	12/04/2014	Sampling Type:	Soil
Project Name:	NEFF FEDERAL #1 & #3 SWD BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	EDDY COUNTY, NM		

Sample ID: SP 2 @ 6" (H403656-01)

BTX 8021B			mg/kg		Analyzed By: CK				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/02/2014	ND	1.85	92.4	2.00	3.28	
Toluene*	<0.050	0.050	12/02/2014	ND	1.82	91.1	2.00	2.76	
Ethylbenzene*	<0.050	0.050	12/02/2014	ND	1.72	85.8	2.00	4.19	
Total Xylenes*	<0.150	0.150	12/02/2014	ND	5.23	87.2	6.00	4.56	
Total BTX	<0.300	0.300	12/02/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 101 % 61-154

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AP				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	12/01/2014	ND	432	108	400	0.00	

TPH 8015M			mg/kg		Analyzed By: CK				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	12/01/2014	ND	194	97.1	200	3.40	
DRO >C10-C28	<10.0	10.0	12/01/2014	ND	193	96.6	200	4.16	

Surrogate: 1-Chlorooctane 123 % 47.2-157

Surrogate: 1-Chlorooctadecane 144 % 52.1-176

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



CARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240
(505) 393-2326 FAX (505) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: BBC International, Inc.		BILL TO		ANALYSIS REQUEST																																											
Project Manager: Cliff Brunson		P.O. #:																																													
Address: P.O. Box 805		Company:																																													
City: Hobbs		Attn:																																													
State: NM Zip: 88241		Address:																																													
Phone #: 575-397-6388 Fax #: 575-397-0397		City: Spine																																													
Project #:		State: Zip:																																													
Project Name: Mott 1 + 3 SWD		Phone #:																																													
Project Location: Mott Ranch		Fax #:																																													
Sampler Name: VP H Oenches																																															
FOR LAB USE ONLY																																															
Lab I.D.		Sample I.D.		(G)RAB OR (C)OMP.		# CONTAINERS		GROUNDWATER		WASTEWATER		SOIL		OIL		SLUDGE		OTHER:		ACID/BASE:		ICE / COOL		OTHER:		DATE		TIME		CL-		TPH		BTEX													
H403656		SP20611		G		1		X																		11-26		1111		X		X		X													
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Relinquished By: [Signature]		Date: 11-26-14		Received By: [Signature]												Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No		Add'l Phone #:																													
Relinquished By: [Signature]		Time: 5:00		Received By: [Signature]												Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No		Add'l Fax #:																													
Time:																																															
Delivered By: (Circle One)		Sample Condition		CHECKED BY: (Initials)																																											
Sampler - UPS - Bus - Other:		<input checked="" type="checkbox"/> Intact <input type="checkbox"/> Yes <input type="checkbox"/> No		[Signature]																																											
1.20		[Signature]																																													

+ Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

#54

Kathy Purvis

From: Patterson, Heather, EMNRD <Heather.Patterson@state.nm.us>
Sent: Wednesday, August 20, 2014 9:55 AM
To: Cliff P. Brunson; Bratcher, Mike, EMNRD
Cc: C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: RE: OXY-Neff Federal #1 and #3 SWD Battery - Remediation Plan

Cliff,

This remediation plan is approved.

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.

If you have any questions or concerns, and for notification, please contact me.

Heather Patterson
Environmental Specialist
NMOCD District II
(575)748-1283 ext.101

From: Cliff P. Brunson [<mailto:cbrunson@bbcinternational.com>]
Sent: Thursday, August 14, 2014 6:56 PM
To: Bratcher, Mike, EMNRD
Cc: Patterson, Heather, EMNRD; C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: OXY-Neff Federal #1 and #3 SWD Battery - Remediation Plan

Mike,

This e-mail is to confirm our conversation on August 11, 2014 about the remediation plan for the above referenced site. I have attached the materials that we used in our discussion. As discussed, Oxy will excavate to a depth of 6 inches in the area of SP1 and SP2. In the area around SP3, the excavation will be 3 to 4 feet with a liner then put in place. In the area of SP4, the excavation will be 1 foot. The liner inside the battery will be cleaned as well. All of these areas are depicted on the attached diagram. Then the site will then be backfilled with clean soil.

If you would please e-mail your concurrence with this remediation plan, it would be greatly appreciated.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS
President
BBC International, Inc.
World-Wide Environmental Specialists
Mailing Address:
P. O. Box 805
Hobbs, NM 88241-0805 USA
Shipping Address:
1324 W. Marland St.
Hobbs, NM 88240 USA
Phone: (575) 397-6388

Fax: (575) 397-0397

E-Mail: cbrunson@bbcinternational.com

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Kathy Purvis

From: Hughes, Solomon <shughes@blm.gov>
Sent: Friday, August 29, 2014 12:28 PM
To: Cliff P. Brunson
Cc: C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis; Heather.Patterson@state.nm.us; Bratcher, Mike, EMNRD
Subject: Re: FW: OXY-Neff Federal #1 and #3 SWD Battery - Remediation Plan

Cliff,

I have one stipulation for this one:

Let's get a confirmation sample, after the six-inch scrape, at SP2.

Thanks,
Sol

Sol Hughes

Environmental Protection Division
Bureau of Land Management
620 E. Greene St
Carlsbad, NM

Office: 575.234.5951
Cell: 575.499.3378

On Thu, Aug 28, 2014 at 11:27 AM, Cliff P. Brunson <cbrunson@bbcinternational.com> wrote:

Sol,

This e-mail is to request the BLM's approval for the following remediation plan for the above referenced site. I have attached the materials that pertain to the site and the plan. This plan has already been approved by Mike Bratcher of the NMOCD as the approval e-mail is below. Oxy will excavate to a depth of 6 inches in the area of SP1 and SP2. In the area around SP3, the excavation will be 3 to 4 feet with a liner then put in place. In the area of SP4, the excavation will be 1 foot. The liner inside the battery will be cleaned as well. All of these areas are depicted on the attached diagram. Then the site will then be backfilled with clean soil.

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Thanks, Cliff

Cliff P. Brunson, CEI, CRS
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From: Heather Patterson <heather.patterson@state.nm.us>
Date: Wednesday, August 20, 2014 at 9:54 AM
To: Cliff Brunson <cbrunson@bbcinternational.com>, Mike Bratcher <mike.bratcher@state.nm.us>
Cc: C J Summers <Chancey_Summers@oxy.com>, Ken Swinney <kswinney@bbcinternational.com>, Jennifer Gilkey <jgilkey@bbcinternational.com>, Kathy Purvis <kathy@bbcinternational.com>
Subject: RE: OXY-Neff Federal #1 and #3 SWD Battery - Remediation Plan

Cliff,

This remediation plan is approved.

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.

If you have any questions or concerns, and for notification, please contact me.

Heather Patterson

Environmental Specialist

NMOCD District II

(575)748-1283 ext.101

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Sent: Thursday, August 14, 2014 6:56 PM
To: Bratcher, Mike, EMNRD
Cc: Patterson, Heather, EMNRD; C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: OXY-Neff Federal #1 and #3 SWD Battery - Remediation Plan

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Thanks, Cliff

Cliff P. Brunson, CEI, CRS

President

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