

January 29, 2016

Mike Bratcher New Mexico Energy, Minerals & Natural Resources Oil Conservation Division, Environmental Bureau - District 2 811 S. First St. Artesia, NM 882L0

> RE: Corrective Action Plan Burnett Oil Co., Inc. - Gissler B 31 UL/M sec. 11 T17S R30E

Mr. Bratcher:

The above location is located approximately 2 miles northeast of Loco Hills, New Mexico at UL/L sec. 14 T17S R30E. The site is located in an area of no known groundwater.

On September 30, 2015 a release was discovered of 32 barrels of oil and produced water. The release occurred when a steel injection line from the GJSUA 22 WIW (API # 30-015-04148) ruptured and came to surface. The release impacted a 100' x 50' on the south side of the Gissler B 31 location as well as the pasture. The BLM and the NMOCD were both notified of the release on September 30, 2015, with the initial C-141 sent in October 1, 2015.

On October 15, 2015, Burnett Oil Co., Inc. collected initial samples at four different sample points. On October 29, 2015 BLM, NMOCD, and Burnett Oil Co., Inc. conducted an onsite meeting to discuss further actions in the remediation process. During the onsite meeting a decision was made to delineate below the initial sample points. On December 3, 2015 Burnett Oil Co., Inc. went back to location and collected additional samples in two different sample points within the impacted area.

### **Corrective Action Plan**

As per the conversation on October 29, 2015, Burnett Oil Co., Inc. would like to remediate the impacted area in place. Based on the analytical from the sampling data the areas of AH-2, AH-3, AH-4, T-1, and T-2, which are located in the pasture, all show a non-detect for BTEX and TPH. To remediate the chloride impacted soil, Burnett Oil Co., Inc. would like to work the impacted area with chloride bonding agents, flush the area with fresh water and drive the chlorides approximately 3' below surface level allowing for regrowth of vegetation. After each installment of binding agents, Burnett Oil Co., Inc. will collect samples for verification of



### January 29, 2016

remediation success. Once chlorides have been pushed below the root zone the area will be reseeded with BLM #2 seed mix, and the area will be observed until sufficient regrowth occurs.

Following the approval of the plan and after the remediation has taken place, Burnett Oil Co., Inc. will submit all proper closure documentation to the NMOCD and the BLM in accordance to the State and Federal Guidelines set forth.

Please feel free to contact me with any questions concerning this remediation plan request.

Sincerely,

Johńny Títsworth HSE Coordinator Burnett Oil Co., Inc. P.O. Box 188 / CR 220 North Loco Hills, NM 88255 (432)-425-2891 Email: jtitsworth@burnettoil.com

### State of New Mexico Energy Minerals and Natural Resources

Form C-141 Revised August 8, 2011

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

1220 5. 50. 1141	ois Dr., Sunta	re, min 07000		Sa	nta Fe,	NM 875	03				
<b>Release Notification and Corrective Action</b>											
					(	OPERAT		X Initial	Report	Final Report	
Name of Co	mpany E	Burnett Oil	Co., Inc.			Contact	Leslie Garvis				
Address 80	)1 Cherry	Street, Ste	1500, F	t. Worth, TX 76	102 T		lo. 817-583-87	730			
Facility Nan	Facility Name Gissler B 31 Facility Type Oil Well										
Surface Ow	ner BLM			Mineral O	wner	BLM		API No.	30-015	-32200	
LOCATION OF RELEASE											
Unit Letter	Section	Township	Range	Feet from the	North/S	South Line	Feet from the		County		
L	14	17S	30E	1650	South	1	990	West	Eddy		
	1	L	La	titude		Longitud	e	and the second			
NATURE OF RELEASE											
Type of Rele	ase Oil/p	roduced wa	ater				Release 2 bbls/30			0	
Source of Re	lease Stee	I flowline corr	roded and	ruptured			lour of Occurrenc	e Date and H	lour of Dis	covery 9/30/15 0800	
Was Immedia	ate Notice (	Given?	Yes [	] No 🗌 Not Re	equired	If YES, To VMail & En		, OCD & J.Amos, BL	M		
By Whom?	Leslie Ga				-	Date and H					
Was a Water		ched?		-		If YES, Vo	lume Impacting 1	he Watercourse.			
			] Yes 🛛	] No				121.			
If a Watercou	urse was Im	pacted, Desci	ribe Fully.	*							
N/A											
Describe Cau	ise of Probl	em and Reme	edial Actic	n Taken *	<u></u>		-				
Steel Flowlin	e from the (	GJSAU 22 W	IW (API #3	30-15-04148) corre	oded and	I ruptured at	the Gissler B 31	site.			
										21	
Describe Are	ea Affected	and Cleanup	Action Ta	ken.*							
Release occ	urred on the	e pad and flow	ved into th	e nearby pasture.	An area	of approximation	ately 100'x5' was	affected in the pastu	ire. Area w	ill be assessed and	
remediated p	per regulato	ry standards.	Clean up	plan will be submi	tted by E	BOCI - J. Tits	worth.				
								inderstand that pursu	ant to NM	OCD rules and	
romulations a	Il operators	are required	to report a	nd/or file certain	elease no	otifications a	nd perform corre	ctive actions for rele	ases which	may endanger	
muhlia haalth	or the envi	ronment Th	e accentar	ce of a C-141 rep	ort by the	NMOCD m	arked as "Final F	Report" does not relie	eve the ope	rator of liability	
should their	operations l	have failed to	adequatel	y investigate and particular of a C-141	remediate	e contaminat	on that pose a the	reat to ground water, responsibility for co	mpliance w	with any other	
federal, state	e, or local la	ws and/or reg	gulations.	plance of a C-141	report a	oes not rene					
	/						OIL CON	SERVATION	DIVISIO	<u>ON</u>	
Signature: Justie Baris											
Printed Name: Leslie Garvis Approved by Environmental Specialist:											
	gulatory Co	ordinator				Approval Da	te:	Expiration I	Date:		
E-mail Add	ress. Igarvi	is@burnettoil	.com			Conditions o	f Approval:		Attached	4 <b>[</b> ]	
Date: 10/7/1	035.			e: 817-583-8730					Anacheo	· 🖵	
Date Willi	U C		Phone						1		

\* Attach Additional Sheets If Necessary



December 10, 2015

JOHNNY TITSWORTH Burnett Oil Co., Inc P. O. BOX 188 LOCO HILLS, NM 88255

**RE: GISSLER B 31** 

Enclosed are the results of analyses for samples received by the laboratory on 12/03/15 12:00.

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 <a href="https://www.tceq.texas.gov/field/qa/lab">www.tceq.texas.gov/field/qa/lab</a> accredited certif.html.

Cardinal Laboratories is accreditated 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,

Celez D. Keine

Celey D. Keene Lab Director/Quality Manager



### Analytical Results For:

Burnett Oil Co., Inc JOHNNY TITSWORTH P. O. BOX 188 LOCO HILLS NM, 88255 Fax To: None

12/03/2015
12/10/2015
GISSLER B 31
NONE GIVEN
EDDY CO., NM

Sampling Date:12/03/2015Sampling Type:SoilSampling Condition:Cool & IntactSample Received By:Jodi Henson

### Sample ID: T-1 5-5.5' (H503161-01)

Chloride, SM4500Cl-B	mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	17200	16.0	12/08/2015	ND	432	108	400	3.77	

### Sample ID: T-1 6-6.5' (H503161-02)

Chloride, SM4500Cl-B	Analyzed By: AP								
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	15800	16.0	12/08/2015	ND	432	108	400	3.77	

### Sample ID: T-1 8-8.5' (H503161-03)

Chloride, SM4500Cl-B	mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	7330	16.0	12/08/2015	ND	432	108	400	3.77	

### Sample ID: T-1 9-9.5' (H503161-04)

Chloride, SM4500Cl-B	mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	5330	16.0	12/08/2015	ND	432	108	400	3.77	

### **Cardinal Laboratories**

### \*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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### Analytical Results For:

Burnett Oil Co., Inc JOHNNY TITSWORTH P. O. BOX 188 LOCO HILLS NM, 88255 Fax To: None

Received:	12/03/2015
Reported:	12/10/2015
Project Name:	GISSLER B 31
Project Number:	NONE GIVEN
Project Location:	EDDY CO., NM

Sampling Date:12/03/2015Sampling Type:SoilSampling Condition:Cool & IntactSample Received By:Jodi Henson

### Sample ID: T-1 10-10.5' (H503161-05)

Chloride, SM4500Cl-B	mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	9600	16.0	12/08/2015	ND	432	108	400	3.77	

### Sample ID: T-1 12-12.5' (H503161-06)

Chloride, SM4500Cl-B	mg/kg		Analyzed By: AP					A CONTRACTOR OF THE OWNER	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	6260	16.0	12/08/2015	ND	432	108	400	3.77	

### Sample ID: T-2 4-4.5' (H503161-07)

Chloride, SM4500Cl-B	mg/kg		Analyzed By: AP						and the second secon
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1540	16.0	12/08/2015	ND	432	108	400	3.77	

### Sample ID: T-2 6-6.5' (H503161-08)

Chloride, SM4500Cl-B	mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	3280	16.0	12/08/2015	ND	432	108	400	3.77	

### Sample ID: T-2 8-8.5' (H503161-09)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2560	16.0	12/08/2015	ND	432	108	400	3.77	

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



12/03/2015

Cool & Intact

Jodi Henson

Soil

### Analytical Results For:

Burnett Oil Co., Inc JOHNNY TITSWORTH P. O. BOX 188 LOCO HILLS NM, 88255 Fax To: None

Received:	12/03/2015
Reported:	12/10/2015
Project Name:	GISSLER B 31
Project Number:	NONE GIVEN
Project Location:	EDDY CO., NM

### Sample ID: T-2 10-10.5' (H503161-10)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	5600	16.0	12/08/2015	ND	400	100	400	3.92	

Sampling Date:

Sampling Type:

Sampling Condition:

Sample Received By:

### Sample ID: T-2 12-12.5' (H503161-11)

Chloride, SM4500Cl-B	mg/	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	688	16.0	12/08/2015	ND	400	100	400	3.92	

### Sample ID: BACKGROUND (H503161-12)

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	12/08/2015	ND	400	100	400	3.92	

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### \*=Accredited Analyte

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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

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### \*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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# CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

### 101 East Marland, Hobbs, NM 88240

(575) 393-2326 FAX (575) 393-2476	FAX (575) 393-2476		
Company Name: Barnett Oil C.	a. Inc	BILL TO	ANALYSIS REQUEST
thany	24	P.O. #:	
Address: P.O. Bax 188	1 CR 220 N	Company:	
lao Hills	State: NM Zip: 88755	Attn:	
Phone #: (432) 425 - 2891	Fax #:	Address:	
Project #:	Project Owner:	City:	
Project Name: Chieskey 13 31		State: Zip:	
4 P	23	Phone #:	
κ	Jont	Fax #:	
Astrony	MATRIX	PRESERV. SAMPLING	
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 Chlanidy 5	
7	Maa I I	X 128/15 X	
7			
28 7-1 8:85			
7			
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10 7-2 10:10.5	durba rannada for ann claim amajor uthefher hetaef in c	stand or both shall be limited to the amount baid by the client for the	
PLEASE NOTE: Liability and Damages Cardinal's lability and client's ex analyses. All cleans including those for negligence and any other cause v service. In no event shall Cardinal be liable for incidential or consequences	PLEASE MOTE: Usability and Clamoges. Canonials stability and other's exclusive tendory of yourna works works work or works works works and an and an and an other canonical and other and an and an and an other canonical and other and an and and	PLEASE WOTE: Usability and Claimoges. Cancinalis stability and client's exclusive tendory of yournaming users in yournaming users in yournaming and users and the stability and plent as a stability of the solid stability and plent as a stability of the solid stability and the stability of the solid stability and the stability and the stability of the solid stability and the solid stability of the solid stabi	
Relinquished By:	Received	By: Phone Result: Yes Fax Result: Yes REMARKS:	s 🛛 No Add'i Phone #: s 🗌 No Add'i Fax #:
Relinquished By:	Date: Received By: Time:		
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+ Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326

Page 6 of 7

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# CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

### 101 East Marland, Hobbs, NM 88240

† Cardinal cannot accept verbal changes. Please fax written changes to (575) 395 2326	Delivered By: (Circle One) Sampler - UPS - Bus - Other:	Relinguished By: Date: Time:	Relinquished By:	anaryses on common that Cadinat be fabre for incidental or consequential damages. In service, in no event shall Cadinat be fabre for incidental or consequential damages. In affiliates or successors arising out of or related to the performance of services hereunds	PLEASE NOTE: Lability and Damages. Cardinal's lability and clerif's exclusive remed				CIONNO .	11 7.2 12-12.5	H5031/1		Sample ID	FOR LAE USE CMUY	Sampler Name: Johney West Scith	Project Location: Fdely Co. Non	Project Name: Chiefer B 31	Project #: Project Owner:	10 #: (432) 425- 2841 Fax #:	Low Hills State:	1 02 77	: Johnny Trus was	Company Name: Right Oil Ca. Inc.	(575) 393-2326 FAX (575) 393-2476
lease fax written changes to (575) 3952326	Sample Condition CHECKED BY: Cool Intact Indicated International	Received By:	COON Jamson	serves in no even build addread be labele for incodental of consequential damages, including without limitation, buseress interruptions, loss of use of tess of portis incurring by clears, no succession any of the above stated exectors or builds addread by the stated exectors or builds addread by the above	PLEASE NOTE: Liability and Damages. Candinal's liability and client's exclusive remedy for any claim ansing whether based in contract or but shall be limited to the amount paid by the client for the non-two as norms, including information there for medicence and my other cause whatboever shall be deemed waived unless made in writing and received by Cardinal wathin 30 days after completion of the applicable				AV I I I I I I I I I I I I I I I I I I I		# CO GRO WAS SOI OIL SLU OTH ACI	DNTA DUNE STEV JDGE HER : JD/BA : / CO HER	SE: OL	S ER }	Fax #: MATRIX PRESERV SAMPLING	Phone #:	State: Zip:	ter: City:	Address:	MM Zip: 88255 Attn:	Company:	P.O. #:		
		,	□ Yes □ No Add'I Fax #:	] Yes	e p privable					X		CL	alovii	dys									ANALTSIS REQUEST	

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## Table 1 - Analytical Results

			1	10/15/2015		u				10/15/2015	Date
				AH-2			-			AH-1	Sample ID
	3'-3.5'	2'-2.5'	1'-1.5'	0-1'	5'-5.5'	4'-4.5'	3'-3.5'	2'-2.5'	1'-1.5'	0-1'	Depth
	11600	10100	8640	4800	11500	4080	3520	2640	2720	21200	Chloride
				<10.0						<10.0	TPH - GRO TPH - DRO
				<10.0						<10.0	TPH - DRO
										<0.050	Benzene
		1								<0.050	Toluene
			2						2	<0.050	Ethylbenzene
									8	<0.150	Xylene
										<0.300	BTEX

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## Table 1 - Analytical Results

				10/15/2015			ð		10/15/2015	Date
				AH-4					AH-3	Sample ID
	3'-3.5'	2'-2.5'	1'-1.5'	0-1'	4'-4.5'	3'-3.5'	2'-2.5'	1'-1.5'	0-1'	Depth
	1810	1220	336	224	14700	1090	1960	2120	448	Chloride
				<10.0					<10.0	TPH - GRO TPH - DRO
				<10.0					<10.0	TPH - DRO
									<0.050	Benzene
									<0.050	Toluene
									<0.050	Ethylbenzene
									<0.150	Xylene
					T				<0.300	BTEX



## Table 1 - Analytical Results

12/3/2015	12/3/2015	12/3/2015	12/3/2015	12/3/2015	12/3/2015	12/3/2015	12/3/2015	12/3/2015	12/3/2015	12/3/2015	12/3/2015	Date
Background	T-2	T-2	T-2	T-2	T-2	Γ-I	T-1	T-1	T-1	T-1	T-1	Sample ID
surface	12'-12.5'	10'-10.5'	8'-8.5'	6'-6.5'	4'-4.5'	12'-12.5'	10'-10-5'	9'-9.5'	8'-8.5'	6'-6.5'	5'-5.5'	Depth
<16.0	688	5600	2560	3280	1540	6260	9600	5330	7330	15800	1720	Chloride
												TPH - GRO TPH - DRO
												TPH - DRO
												Benzene
												Toluene
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