

# Closure Report

## Site Description

Site Name:	Federal 23 #13H
Company:	Oxy Permian Ltd.
Legal Description:	U/L D, Section 26, T22S, R31E
County:	Eddy County, NM
GPS Coordinates:	N 32.36785° W 103.75581°

## Release Data

Date of Release:	08/24/2015
Type of Release:	Oil and produced water
Source of Release:	Stress/fatigue of 4" poly production line
Volume of Release:	10 bbls oil, 10 bbls produced water
Volume Recovered:	60 bbls, including approximately 40 bbls of rain water

## Remediation Specifications

Remediation Parameters:	Excavate the spill areas around SP1 and SP2 to a depth of 1 foot. Excavate the area around SP3 to a depth of 1.5 feet. Backfill the site with clean soil.
Remediation Activities:	November 2015

Plan Sent to OCD:	11/22/2015	Email from Cliff Brunson to Mike Bratcher
OCD Approval of Plan:	11/25/2015	Email from Mike Bratcher to Cliff Brunson
Plan Sent to BLM:	11/22/2015	Email from Cliff Brunson to Shelly Tucker
BLM Approval of Plan:	11/23/2015	Email from Shelly Tucker to Cliff Brunson

## Supporting Documentation

Initial C-141	Signed 09/11/2015
Final C-141	Signed 02/23/2016
Site Diagram	August 2015
Groundwater Plot	175'
TOPO Maps	August 2015
Lab Summary	08/27/2015
Lab Analysis	08/27/2015
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.

02/25/2016

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	CJ Summers
Address	6 Desta Drive, Midland, TX 79705	Telephone No.	(432) 685-5824
Facility Name	Federal 23 #13H	Facility Type	Well
Surface Owner	BLM	Mineral Owner	
		API No.	30-015-41636

#### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
D	26	22S	31E					Eddy County, NM

Latitude N 32.36785° Longitude W 103.75581°

#### NATURE OF RELEASE

Type of Release	Oil and produced water	Volume of Release	10 bbls oil, 10 bbls produced water	Volume Recovered	60 bbls, including approx.. 40 bbls of rain water
Source of Release	Stress/fatigue of a 4" poly production line	Date and Hour of Occurrence	08/24/2015	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 and Heather Patterson-NMOCD, Shelly Tucker-BLM		
By Whom?	Kathy Purvis @ BBC International Inc.	Date and Hour	08/25/2015 @ 2:35 pm		
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.\*

Stress/fatigue of a 4" poly line caused 10 bbls of oil and 10 bbls of produced water onto the ground. The line was repaired and a vacuum truck recovered 60 bbls of fluids, including approximately 40 bbls of rain water.

Describe Area Affected and Cleanup Action Taken.\*

The affected area is approximately 20' x 30' on location. Remediation will be completed according to 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: 	<b>OIL CONSERVATION DIVISION</b>		
Printed Name: CJ Summers	Approved by Environmental Specialist:		
Title: HES Lead	Approval Date:	Expiration Date:	
E-mail Address: chancey_summers@oxy.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 9-11-15	Phone: (432) 685-5824		

\* Attach Additional Sheets If Necessary

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  
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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	Casey Summers
Address	6 Desta Drive, Midland, TX 79705	Telephone No.	(575) 513-8289
Facility Name	Federal 23 #13H	Facility Type	Well
Surface Owner	BLM	Mineral Owner	
		API No.	30-015-41636

#### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
D	26	22S	31E					Eddy County, NM

Latitude N 32.36785° Longitude W 103.75581°

#### NATURE OF RELEASE

Type of Release	Oil and produced water	Volume of Release	10 bbls oil, 10 bbls produced water	Volume Recovered	60 bbls, including approx.. 40 bbls of rain water
Source of Release	Stress/fatigue of a 4" poly production line	Date and Hour of Occurrence	08/24/2015	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 and Heather Patterson-NMOCD, Shelly Tucker-BLM		
By Whom?	Kathy Purvis @ BBC International Inc.	Date and Hour	08/25/2015 @ 2:35 pm		
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.\*

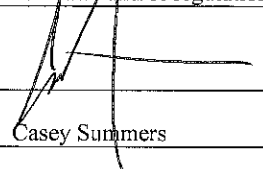
Describe Cause of Problem and Remedial Action Taken.\*

Stress/fatigue of a 4" poly line caused 10 bbls of oil and 10 bbls of produced water onto the ground. The line was repaired and a vacuum truck recovered 60 bbls of fluids, including approximately 40 bbls of rain water.

Describe Area Affected and Cleanup Action Taken.\*

The affected area is approximately 20' x 30' on location. Remediation was completed according to the remediation plan approved by Mike Bratcher of NMOCD via email on 11/25/2015 and approved by Shelly Tucker of the BLM via email on 11/23/2015.

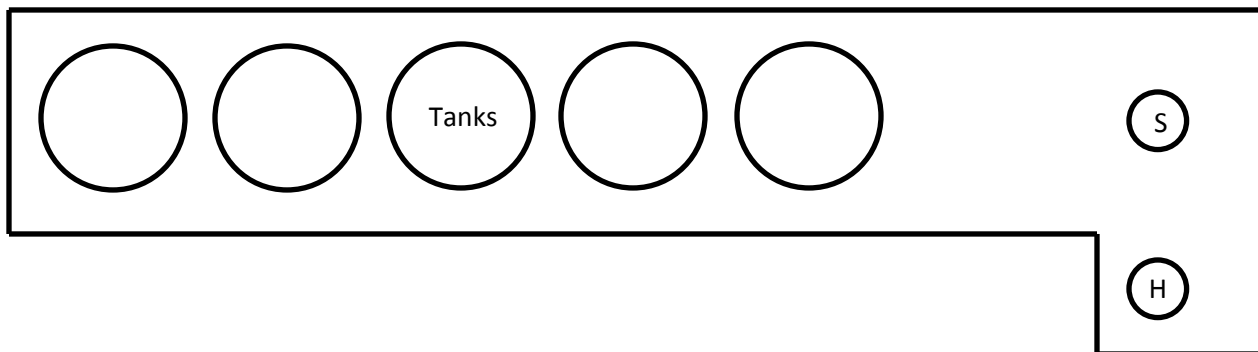
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger 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: 		<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Casey Summers		Approved by Environmental Specialist:	
Title: NM Environmental Advisor		Approval Date:	Expiration Date:
E-mail Address: casey_summers@oxy.com		Conditions of Approval:	Attached <input type="checkbox"/>
Date: 2-23-16 Phone: (575) 513-8289			

\* Attach Additional Sheets If Necessary



Oxy  
Federal 23 #13H

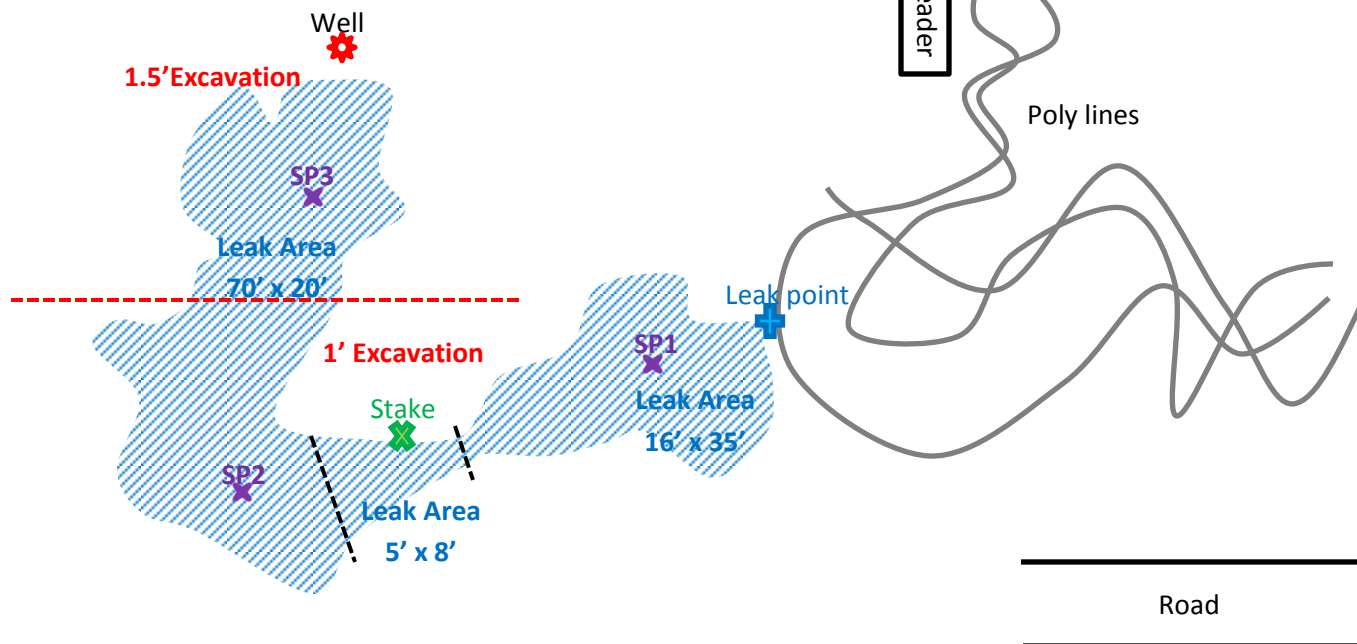


U/L D, Section 26, T22S, R31E

Eddy County, NM

N 32.36785° W 103.75581°

API# 30-015-41636



BBC International, Inc.

Oxy  
Federal 23 #13H

Date: 08/27/2015

DRWG by: K. Purvis

NOT TO SCALE

File: Oxy 2015



# Groundwater Plot

Oxy Federal 23 #13H

County  
Eddy

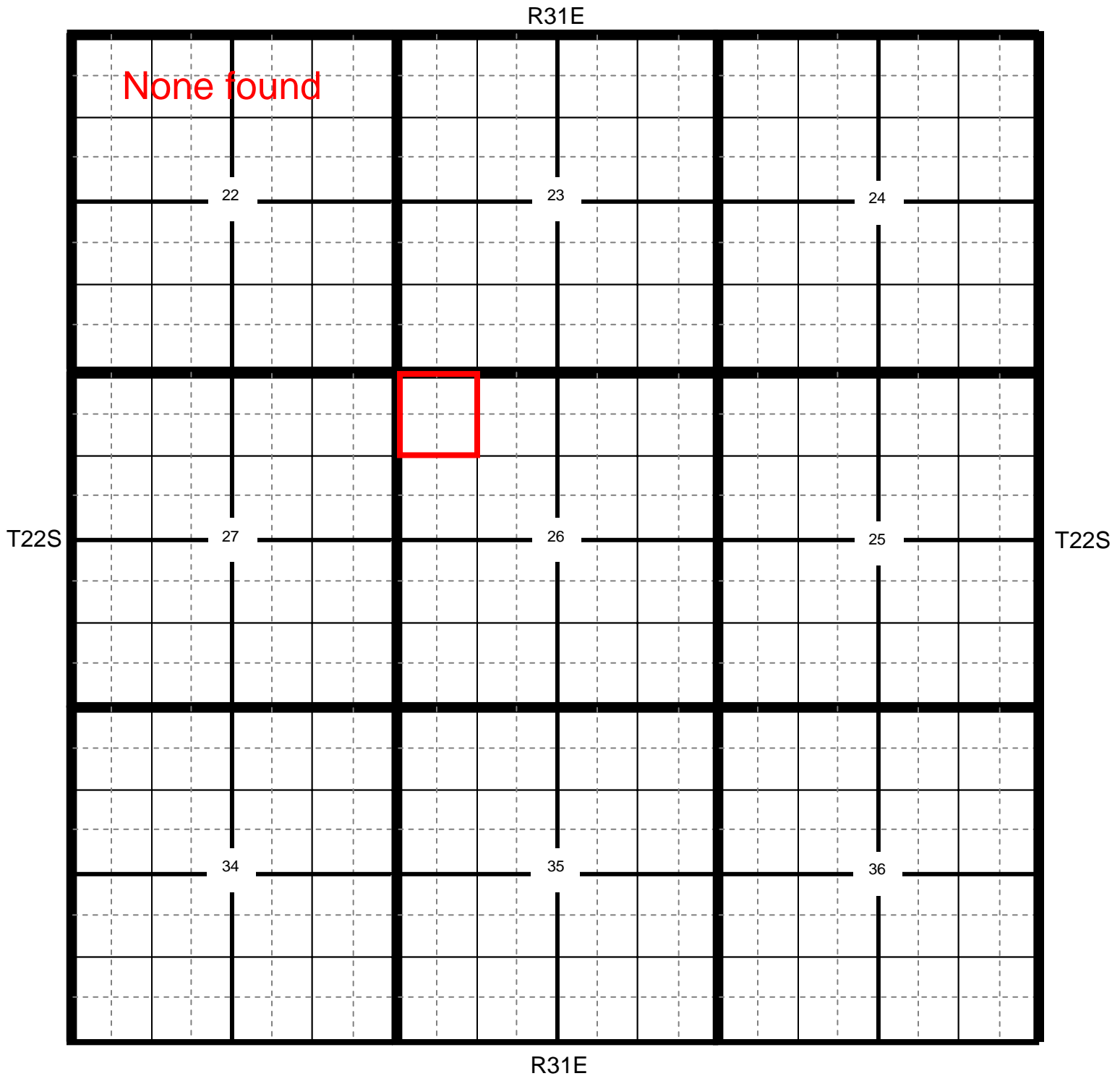
Unit Letter  
D

Section  
26

Township  
22S

Range  
31E

Trend Map 175'



Location

OCD

USGS

SEO

All Databases

## Oxy Federal 23 #13H

**County** Eddy      **Unit Letter** D      **Section** 26      **Township** 22S      **Range** 31E

Trend Map 175'

1

2

NW/NW Unit Letter D	NE/NW Unit Letter C	NW/NE None found Unit Letter B	NE/NE Unit Letter A
SW/NW Unit Letter E	SE/NW Unit Letter F	SW/NE Unit Letter G	SE/NE Unit Letter H
NW/SW Unit Letter L	NE/SW Unit Letter K	NW/SE Unit Letter J	NE/SE Unit Letter I
SW/SW Unit Letter M	SE/SW Unit Letter N	SW/SE Unit Letter O	SE/SE Unit Letter P

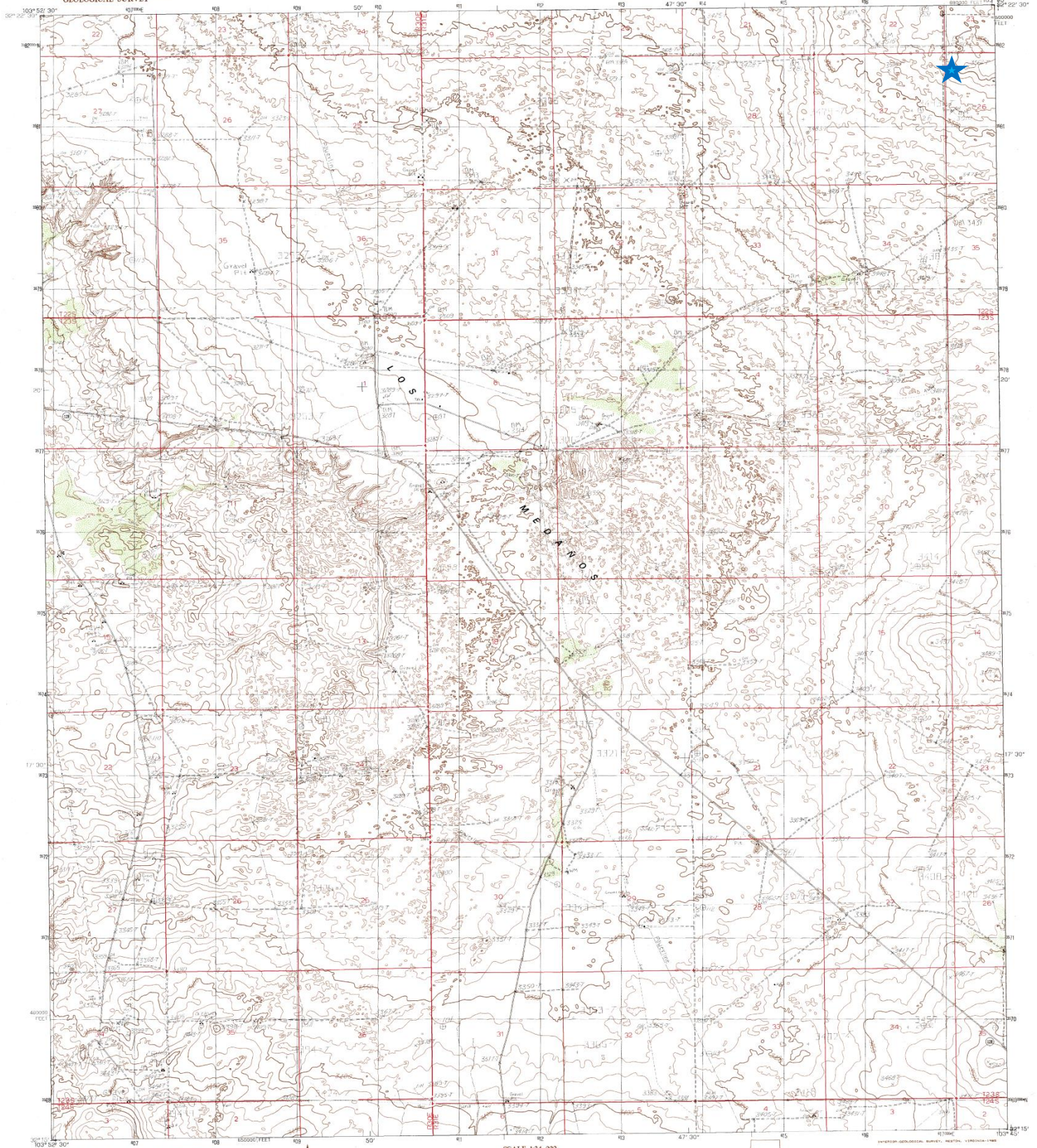
3

4



# Federal 23 #13H

LOS MEDAÑOS QUADRANGLE  
NEW MEXICO-EDDY CO.  
7.5 MINUTE SERIES (TOPOGRAPHIC)



PRODUCED BY THE UNITED STATES GEOLOGICAL SURVEY  
 UNITED STATES GEOLOGICAL SURVEY U.S. GEOLOGICAL SURVEY  
 COMPILED FROM AERIAL PHOTOGRAPHS TAKEN - 1967  
 FIELD CHECKED - 1978 MAP EDITED - 1978  
 UTM - 18N TRANSVERSE MERCATOR  
 630000METER UNIVERSAL TRANSVERSE MERCATOR ZONE 18  
 840000METER UTM GRID EASTING  
 4800000METER UTM GRID NORTHING 53°30' EAST  
 60° MAGNETIC NORTH DECLINATION 53°30' EAST  
 1983 NATIONAL MAGNETIC ANOMALY DATUM IF  
 HORIZONTAL DATUM 1967 NORTH AMERICAN DATUM  
 To place on the predicted North American Datum of 1983,  
 move the projection lines as shown by dashed corner ticks,  
 90 meters south and 90 meters east.  
 The private inclusions within the boundaries of any  
 Federal and State Reservations shown on this map  
 All marginal data and lettering generated and positioned by  
 automated type placement procedures

PROVISIONAL MAP  
Produced from original  
manuscript drawings. Infor-  
mation shown as of date of  
field check. 3

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS  
FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225  
OR RESTON, VIRGINIA 22092

NEW MEXICO

QUADRANGLE LOCATION

1	2	3	1 Tenney Hill South
			2 Livingston Ridge
4		5	3 The Divide
			4 Remond's Ridge
			5 Boring Ridge
			6 Pierce Canyon
6	7	8	7 Big Hole
			8 Padua Breaks NW

ADJOINING 2.5° QUADRANGLE NAMES

ROAD LEGEND

Improved Road . . . . .  
Unimproved Road . . . . .  
Trail . . . . .

 Seasonal Route  F.R. Route  State Route

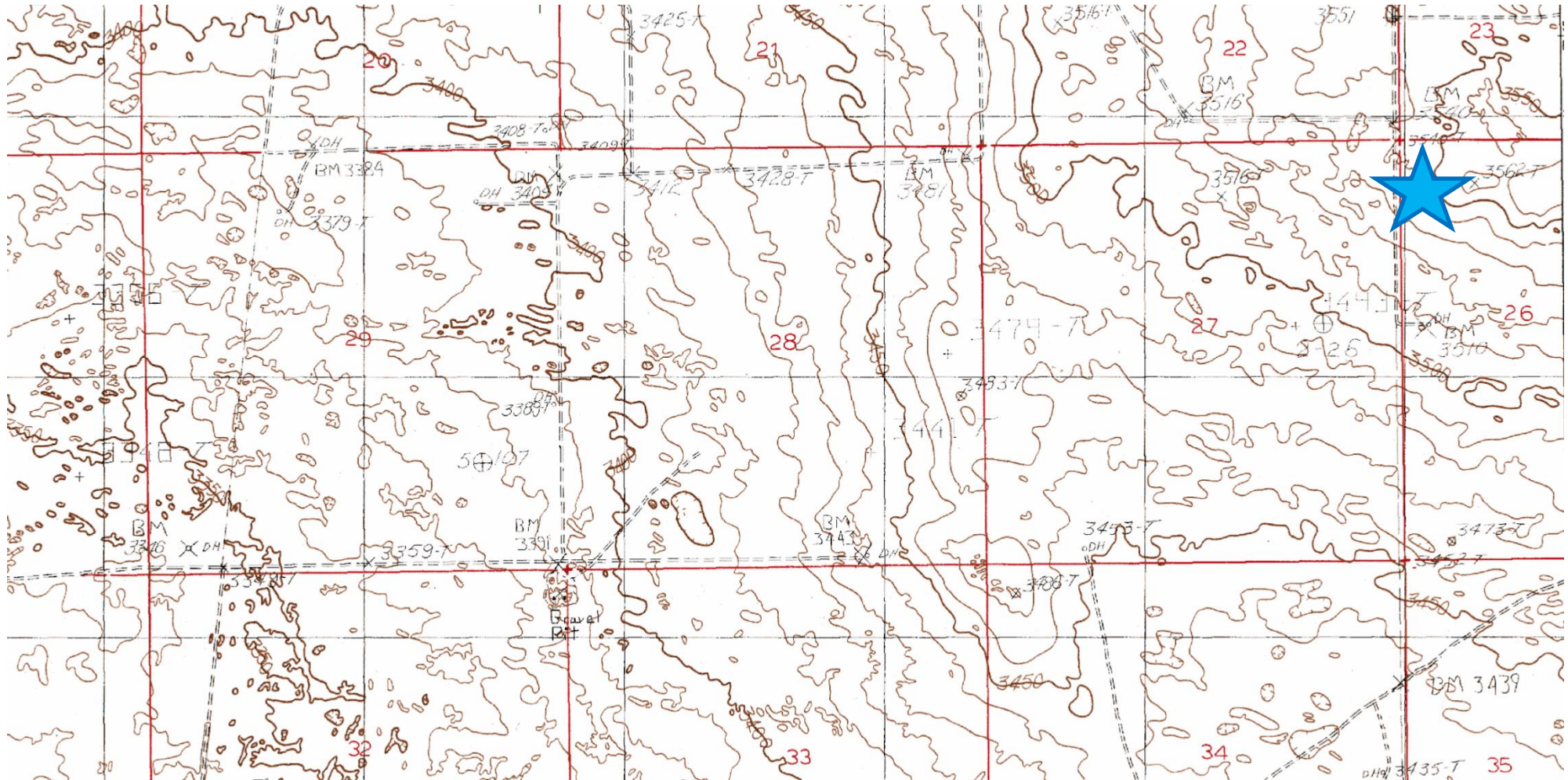
LOS MEDAÑOS, NEW MEXICO  
PROVISIONAL EDITION 1985

32103C7-TF-024



Oxy

# Federal 23 #13H





**Laboratory Analytical Results Summary  
Federal 23 #13H**

		Sample	SP1 @ SURFACE	SP1 @ 1'	SP1 @ 2'	SP1 @ 3'
Analyte	Method	Date	8/27/15	8/27/15	8/27/15	8/27/15
			mg/Kg	mg/Kg	mg/Kg	mg/Kg
<b>Benzene</b>	BTEX 8021B		<b>0.208</b>	<0.050	<0.050	<0.050
<b>Toluene</b>	BTEX 8021B		<b>2.55</b>	<0.050	<0.050	<0.050
<b>Ethylbenzene</b>	BTEX 8021B		<b>2.79</b>	<0.050	<0.050	<0.050
<b>Total Xylenes</b>	BTEX 8021B		<b>11.8</b>	<0.150	<0.150	<0.150
<b>Total BTEX</b>	BTEX 8021B		<b>17.3</b>	<0.300	<0.300	<0.300
<b>Chloride</b>	SM4500Cl-B		<b>48000</b>	<b>864</b>	<b>48</b>	<b>112</b>
<b>GRO</b>	TPH 8015M		<b>492</b>	<10.0	<10.0	<10.0
<b>DRO</b>	TPH 8015M		<b>16400</b>	<b>328</b>	<10.0	<10.0

		Sample	SP2 @ SURFACE	SP2 @ 1'	SP2 @ 2'	SP2 @ 3'
Analyte	Method	Date	8/27/15	8/27/15	8/27/15	8/27/15
			mg/Kg	mg/Kg	mg/Kg	mg/Kg
<b>Benzene</b>	BTEX 8021B		<0.050	<0.050	<0.050	<0.050
<b>Toluene</b>	BTEX 8021B		<0.050	<0.050	<0.050	<0.050
<b>Ethylbenzene</b>	BTEX 8021B		<0.050	<0.050	<0.050	<0.050
<b>Total Xylenes</b>	BTEX 8021B		<0.150	<0.150	<0.150	<0.150
<b>Total BTEX</b>	BTEX 8021B		<0.300	<0.300	<0.300	<0.300
<b>Chloride</b>	SM4500Cl-B		<b>52800</b>	<b>544</b>	<b>64</b>	<b>64</b>
<b>GRO</b>	TPH 8015M		<10.0	<10.0	<10.0	<10.0
<b>DRO</b>	TPH 8015M		<b>131</b>	<b>111</b>	<10.0	<10.0

		Sample	SP3 @ SURFACE	SP3 @ 1'	SP3 @ 2'	SP3 @ 3'
Analyte	Method	Date	8/27/15	8/27/15	8/27/15	8/27/15
			mg/Kg	mg/Kg	mg/Kg	mg/Kg
<b>Benzene</b>	BTEX 8021B		<0.200	<0.050	<0.050	<0.050
<b>Toluene</b>	BTEX 8021B		<0.200	<0.050	<0.050	<0.050
<b>Ethylbenzene</b>	BTEX 8021B		<b>0.42</b>	<0.050	<0.050	<0.050
<b>Total Xylenes</b>	BTEX 8021B		<b>2.53</b>	<0.150	<0.150	<0.150
<b>Total BTEX</b>	BTEX 8021B		<b>2.95</b>	<0.300	<0.300	<0.300
<b>Chloride</b>	SM4500Cl-B		<b>9730</b>	<b>6000</b>	<b>128</b>	<b>144</b>
<b>GRO</b>	TPH 8015M		<b>305</b>	<10.0	<10.0	<10.0
<b>DRO</b>	TPH 8015M		<b>20900</b>	<b>1180</b>	<b>29.1</b>	<10.0



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

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September 03, 2015

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: FEDERAL 23 13H

Enclosed are the results of analyses for samples received by the laboratory on 08/28/15 14:10.

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](http://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: 08/28/2015  
Reported: 09/03/2015  
Project Name: FEDERAL 23 13H  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 08/27/2015  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Judy Garcia

**Sample ID: SP 1 @ SURFACE (H502297-01)**

BTX 8021B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Benzene*</b>	<b>0.208</b>	0.200	09/01/2015	ND	2.07	103	2.00	5.79	
<b>Toluene*</b>	<b>2.55</b>	0.200	09/01/2015	ND	1.91	95.4	2.00	5.88	
<b>Ethylbenzene*</b>	<b>2.79</b>	0.200	09/01/2015	ND	1.98	98.8	2.00	4.80	
<b>Total Xylenes*</b>	<b>11.8</b>	0.600	09/01/2015	ND	6.08	101	6.00	2.70	
<b>Total BTX</b>	<b>17.3</b>	1.20	09/01/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 123 % 85.6-137

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>48000</b>	16.0	09/03/2015	ND	432	108	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	
<b>GRO C6-C10</b>	<b>492</b>	100	08/31/2015	ND	178	89.0	200	0.362		
<b>DRO &gt;C10-C28</b>	<b>16400</b>	100	08/31/2015	ND	199	99.7	200	0.0682		

Surrogate: 1-Chlorooctane 128 % 47.2-157

Surrogate: 1-Chlorooctadecane 330 % 52.1-176

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



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: 08/28/2015  
Reported: 09/03/2015  
Project Name: FEDERAL 23 13H  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 08/27/2015  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Judy Garcia

**Sample ID: SP 1 @ 1' (H502297-02)**

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	09/01/2015	ND	2.07	103	2.00	5.79		
Toluene*	<0.050	0.050	09/01/2015	ND	1.91	95.4	2.00	5.88		
Ethylbenzene*	<0.050	0.050	09/01/2015	ND	1.98	98.8	2.00	4.80		
Total Xylenes*	<0.150	0.150	09/01/2015	ND	6.08	101	6.00	2.70		
Total BTX	<0.300	0.300	09/01/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 98.9 % 85.6-137

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	864	16.0	09/03/2015	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	08/31/2015	ND	178	89.0	200	0.362	
DRO >C10-C28	328	10.0	08/31/2015	ND	199	99.7	200	0.0682	

Surrogate: 1-Chlorooctane 82.4 % 47.2-157

Surrogate: 1-Chlorooctadecane 92.2 % 52.1-176

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



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: 08/28/2015  
Reported: 09/03/2015  
Project Name: FEDERAL 23 13H  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 08/27/2015  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Judy Garcia

**Sample ID: SP 1 @ 2' (H502297-03)**

BTEx 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	09/01/2015	ND	2.07	103	2.00	5.79		
Toluene*	<0.050	0.050	09/01/2015	ND	1.91	95.4	2.00	5.88		
Ethylbenzene*	<0.050	0.050	09/01/2015	ND	1.98	98.8	2.00	4.80		
Total Xylenes*	<0.150	0.150	09/01/2015	ND	6.08	101	6.00	2.70		
Total BTEx	<0.300	0.300	09/01/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 98.8 % 85.6-137

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	09/03/2015	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	08/31/2015	ND	178	89.0	200	0.362	
DRO >C10-C28	<10.0	10.0	08/31/2015	ND	199	99.7	200	0.0682	

Surrogate: 1-Chlorooctane 73.5 % 47.2-157

Surrogate: 1-Chlorooctadecane 86.2 % 52.1-176

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\*=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: 08/28/2015  
Reported: 09/03/2015  
Project Name: FEDERAL 23 13H  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 08/27/2015  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Judy Garcia

**Sample ID: SP 1 @ 3' (H502297-04)**

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	09/01/2015	ND	2.07	103	2.00	5.79		
Toluene*	<0.050	0.050	09/01/2015	ND	1.91	95.4	2.00	5.88		
Ethylbenzene*	<0.050	0.050	09/01/2015	ND	1.98	98.8	2.00	4.80		
Total Xylenes*	<0.150	0.150	09/01/2015	ND	6.08	101	6.00	2.70		
Total BTX	<0.300	0.300	09/01/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 100 % 85.6-137

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	09/03/2015	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	08/31/2015	ND	178	89.0	200	0.362	
DRO >C10-C28	<10.0	10.0	08/31/2015	ND	199	99.7	200	0.0682	

Surrogate: 1-Chlorooctane 69.1 % 47.2-157

Surrogate: 1-Chlorooctadecane 79.6 % 52.1-176

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Fax To: (575) 397-0397

Received: 08/28/2015  
Reported: 09/03/2015  
Project Name: FEDERAL 23 13H  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 08/27/2015  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Judy Garcia

**Sample ID: SP 2 @ SURFACE (H502297-05)**

BTEx 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	09/02/2015	ND	2.04	102	2.00	0.924		
Toluene*	<0.050	0.050	09/02/2015	ND	1.86	93.1	2.00	0.473		
Ethylbenzene*	<0.050	0.050	09/02/2015	ND	1.94	96.8	2.00	1.70		
Total Xylenes*	<0.150	0.150	09/02/2015	ND	6.01	100	6.00	0.509		
Total BTEx	<0.300	0.300	09/02/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 96.4 % 85.6-137

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	52800	16.0	09/03/2015	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	08/31/2015	ND	178	89.0	200	0.362	
DRO >C10-C28	131	10.0	08/31/2015	ND	199	99.7	200	0.0682	

Surrogate: 1-Chlorooctane 88.7 % 47.2-157

Surrogate: 1-Chlorooctadecane 93.0 % 52.1-176

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Fax To: (575) 397-0397

Received: 08/28/2015  
Reported: 09/03/2015  
Project Name: FEDERAL 23 13H  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 08/27/2015  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Judy Garcia

**Sample ID: SP 2 @ 1' (H502297-06)**

BTEx 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	09/02/2015	ND	2.04	102	2.00	0.924		
Toluene*	<0.050	0.050	09/02/2015	ND	1.86	93.1	2.00	0.473		
Ethylbenzene*	<0.050	0.050	09/02/2015	ND	1.94	96.8	2.00	1.70		
Total Xylenes*	<0.150	0.150	09/02/2015	ND	6.01	100	6.00	0.509		
Total BTEx	<0.300	0.300	09/02/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 98.0 % 85.6-137

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	544	16.0	09/03/2015	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	09/01/2015	ND	178	89.0	200	0.362	
DRO >C10-C28	111	10.0	09/01/2015	ND	199	99.7	200	0.0682	

Surrogate: 1-Chlorooctane 82.7 % 47.2-157

Surrogate: 1-Chlorooctadecane 86.2 % 52.1-176

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Fax To: (575) 397-0397

Received: 08/28/2015  
Reported: 09/03/2015  
Project Name: FEDERAL 23 13H  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 08/27/2015  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Judy Garcia

**Sample ID: SP 2 @ 2' (H502297-07)**

BTEx 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	09/02/2015	ND	2.04	102	2.00	0.924		
Toluene*	<0.050	0.050	09/02/2015	ND	1.86	93.1	2.00	0.473		
Ethylbenzene*	<0.050	0.050	09/02/2015	ND	1.94	96.8	2.00	1.70		
Total Xylenes*	<0.150	0.150	09/02/2015	ND	6.01	100	6.00	0.509		
Total BTEx	<0.300	0.300	09/02/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 99.3 % 85.6-137

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	09/03/2015	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	09/01/2015	ND	178	89.0	200	0.362	
DRO >C10-C28	<10.0	10.0	09/01/2015	ND	199	99.7	200	0.0682	

Surrogate: 1-Chlorooctane 78.6 % 47.2-157

Surrogate: 1-Chlorooctadecane 92.9 % 52.1-176

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Fax To: (575) 397-0397

Received: 08/28/2015  
Reported: 09/03/2015  
Project Name: FEDERAL 23 13H  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 08/27/2015  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Judy Garcia

**Sample ID: SP 2 @ 3' (H502297-08)**

BTEx 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	09/02/2015	ND	2.04	102	2.00	0.924		
Toluene*	<0.050	0.050	09/02/2015	ND	1.86	93.1	2.00	0.473		
Ethylbenzene*	<0.050	0.050	09/02/2015	ND	1.94	96.8	2.00	1.70		
Total Xylenes*	<0.150	0.150	09/02/2015	ND	6.01	100	6.00	0.509		
Total BTEx	<0.300	0.300	09/02/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 97.8 % 85.6-137

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	09/03/2015	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	09/01/2015	ND	178	89.0	200	0.362	
DRO >C10-C28	<10.0	10.0	09/01/2015	ND	199	99.7	200	0.0682	

Surrogate: 1-Chlorooctane 70.4 % 47.2-157

Surrogate: 1-Chlorooctadecane 77.3 % 52.1-176

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Fax To: (575) 397-0397

Received: 08/28/2015  
Reported: 09/03/2015  
Project Name: FEDERAL 23 13H  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 08/27/2015  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Judy Garcia

**Sample ID: SP 3 @ SURFACE (H502297-09)**

BTX 8021B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.200	0.200	09/02/2015	ND	2.04	102	2.00	0.924	
Toluene*	<0.200	0.200	09/02/2015	ND	1.86	93.1	2.00	0.473	
Ethylbenzene*	0.420	0.200	09/02/2015	ND	1.94	96.8	2.00	1.70	
Total Xylenes*	2.53	0.600	09/02/2015	ND	6.01	100	6.00	0.509	
Total BTX	2.95	1.20	09/02/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 105 % 85.6-137

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	9730	16.0	09/03/2015	ND	432	108	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	305	100	09/01/2015	ND	178	89.0	200	0.362		
DRO >C10-C28	20900	100	09/01/2015	ND	199	99.7	200	0.0682		

Surrogate: 1-Chlorooctane 145 % 47.2-157

Surrogate: 1-Chlorooctadecane 436 % 52.1-176

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Fax To: (575) 397-0397

Received: 08/28/2015  
Reported: 09/03/2015  
Project Name: FEDERAL 23 13H  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 08/27/2015  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Judy Garcia

**Sample ID: SP 3 @ 1' (H502297-10)**

BTEx 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	09/02/2015	ND	2.04	102	2.00	0.924		
Toluene*	<0.050	0.050	09/02/2015	ND	1.86	93.1	2.00	0.473		
Ethylbenzene*	<0.050	0.050	09/02/2015	ND	1.94	96.8	2.00	1.70		
Total Xylenes*	<0.150	0.150	09/02/2015	ND	6.01	100	6.00	0.509		
Total BTEx	<0.300	0.300	09/02/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 99.3 % 85.6-137

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	6000	16.0	09/03/2015	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	09/01/2015	ND	178	89.0	200	0.362	
DRO >C10-C28	1180	10.0	09/01/2015	ND	199	99.7	200	0.0682	

Surrogate: 1-Chlorooctane 90.4 % 47.2-157

Surrogate: 1-Chlorooctadecane 103 % 52.1-176

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Fax To: (575) 397-0397

Received: 08/28/2015  
Reported: 09/03/2015  
Project Name: FEDERAL 23 13H  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 08/27/2015  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Judy Garcia

**Sample ID: SP 3 @ 2' (H502297-11)**

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	09/02/2015	ND	2.04	102	2.00	0.924	
Toluene*	<0.050	0.050	09/02/2015	ND	1.86	93.1	2.00	0.473	
Ethylbenzene*	<0.050	0.050	09/02/2015	ND	1.94	96.8	2.00	1.70	
Total Xylenes*	<0.150	0.150	09/02/2015	ND	6.01	100	6.00	0.509	
Total BTX	<0.300	0.300	09/02/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 99.9 % 85.6-137

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	128	16.0	09/03/2015	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	09/01/2015	ND	178	89.0	200	0.362	
DRO >C10-C28	29.1	10.0	09/01/2015	ND	199	99.7	200	0.0682	

Surrogate: 1-Chlorooctane 79.4 % 47.2-157

Surrogate: 1-Chlorooctadecane 89.3 % 52.1-176

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Fax To: (575) 397-0397

Received: 08/28/2015  
Reported: 09/03/2015  
Project Name: FEDERAL 23 13H  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 08/27/2015  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Judy Garcia

**Sample ID: SP 3 @ 3' (H502297-12)**

BTEx 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	09/02/2015	ND	2.04	102	2.00	0.924		
Toluene*	<0.050	0.050	09/02/2015	ND	1.86	93.1	2.00	0.473		
Ethylbenzene*	<0.050	0.050	09/02/2015	ND	1.94	96.8	2.00	1.70		
Total Xylenes*	<0.150	0.150	09/02/2015	ND	6.01	100	6.00	0.509		
Total BTEx	<0.300	0.300	09/02/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 99.7 % 85.6-137

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	144	16.0	09/03/2015	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	09/01/2015	ND	187	93.4	200	0.402	
DRO >C10-C28	<10.0	10.0	09/01/2015	ND	201	101	200	1.77	

Surrogate: 1-Chlorooctane 76.3 % 47.2-157

Surrogate: 1-Chlorooctadecane 76.0 % 52.1-176

Cardinal Laboratories

\*=Accredited Analyte

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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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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager





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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

142

Company Name: BBC International, Inc.

Project Manager: Cliff Brunson

Address: P.O. Box 805

City: Hobbs

Phone #: 575-397-6388

Project #:

Project Name: FEDERAL 23-13H

Project Location:

Sample Name: JFF ORUELAS

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

TPH  
BTEX  
CHLORIDE

ANALYSIS REQUEST

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Relinquished By:

Date: 8/27/15

Time: 3:00pm

Received By:

Phone Result: ☐ Yes ☐ No

Fax Result: ☐ Yes ☐ No

Add'l Phone #:

Add'l Fax #:

Relinquished By:

Date: 8/28/15

Time: 2:00pm

Received By:

Phone Result: ☐ Yes ☐ No

Fax Result: ☐ Yes ☐ No

Add'l Phone #:

Add'l Fax #:

Relinquished By:

Date: 8/28/15

Time: 2:00pm

Received By:

Phone Result: ☐ Yes ☐ No

Fax Result: ☐ Yes ☐ No

Add'l Phone #:

Add'l Fax #:

Relinquished By:

Date: 8/28/15

Time: 2:00pm

Received By:

Phone Result: ☐ Yes ☐ No

Fax Result: ☐ Yes ☐ No

Add'l Phone #:

Add'l Fax #:

Delivered By: (Circle One)

Date: 8/28/15

Time: 2:00pm

Received By:

Phone Result: ☐ Yes ☐ No

Fax Result: ☐ Yes ☐ No

Add'l Phone #:

Add'l Fax #:

Sampler - UPS - Bus - Other:

Date: 8/28/15

Time: 2:00pm

Received By:

Phone Result: ☐ Yes ☐ No

Fax Result: ☐ Yes ☐ No

Add'l Phone #:

Add'l Fax #:

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

#34





## Kathy Purvis

---

**From:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>  
**Sent:** Wednesday, November 25, 2015 10:01 AM  
**To:** Cliff Brunson; Shelly Tucker  
**Cc:** Patterson, Heather, EMNRD; Dusty Wilson; Jennifer\_Duarte@oxy.com; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** RE: OXY Federal 23 #13H - Remediation Plan

RE: OXY USA \* Federal 23 13H \* 30-015-41636  
2RP-3269 \* Date of release: 8/24/2015

Cliff,

Your proposal for remediation of the above referenced release is approved. OCD notes BLM approval has been obtained.

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.

Mike Bratcher  
NMOCD District 2  
811 S. First Street  
Artesia, NM 88210  
O: 575-748-1283 X108  
C: 575-626-0857  
F: 575-748-9720

---

**From:** Cliff Brunson [<mailto:cbrunson@bbcinternational.com>]  
**Sent:** Sunday, November 22, 2015 5:50 PM  
**To:** Bratcher, Mike, EMNRD; Shelly Tucker  
**Cc:** Patterson, Heather, EMNRD; Dusty Wilson; [Jennifer\\_Duarte@oxy.com](mailto:Jennifer_Duarte@oxy.com); Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** OXY Federal 23 #13H - Remediation Plan

Mike and Shelly,

I have attached the remediation materials that we used in our discussions about the remediation plan for the Oxy Federal 23 #13H. Both of you have now verbally agreed to this plan as depicted on the site diagram.

If you would please reply via email with your approval and concurrence of this plan, it would be greatly appreciated. If you have any questions, please let me know.

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](mailto:cbrunson@bbcinternational.com)

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Version: 2015.0.6176 / Virus Database: 4460/11063 - Release Date: 11/25/15

## Kathy Purvis

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**From:** Tucker, Shelly <stucker@blm.gov>  
**Sent:** Monday, November 23, 2015 10:34 AM  
**To:** Cliff Brunson  
**Cc:** Mike Bratcher; Heather Patterson; Dusty Wilson; Jennifer\_Duarte@oxy.com; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** Re: OXY Federal 23 #13H - Remediation Plan

BLM accepts/approves your work plan as submitted.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

*Shelly J Tucker*

Environmental Protection Specialist  
Bureau of Land Management

620 E. Greene St  
Carlsbad, NM 88220

575.234.5905 - Direct  
575.361.0084 - Cellular

[stucker@blm.gov](mailto:stucker@blm.gov)



The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

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On Sun, Nov 22, 2015 at 5:49 PM, Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)> wrote:

Mike and Shelly,

I have attached the remediation materials that we used in our discussions about the remediation plan for the Oxy Federal 23 #13H. Both of you have now verbally agreed to this plan as depicted on the site diagram.

If you would please reply via email with your approval and concurrence of this plan, it would be greatly appreciated. If you have any questions, please let me know.

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](mailto:cbrunson@bbcinternational.com)

\*\*\*\*\*

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Version: 2015.0.6176 / Virus Database: 4460/11052 - Release Date: 11/23/15

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Version: 2015.0.6176 / Virus Database: 4460/11047 - Release Date: 11/22/15



