

# Closure Report

## Site Description

Site Name:	Rocky Hills SWD #001
Company:	Oxy Permian
Legal Description:	U/L O, Section 19, T21S, R24E
County:	Eddy County, NM
GPS Coordinates:	N 32.45842° W 104.53439°

## Release Data

Date of Release:	06/25/2016
Type of Release:	Produced water
Source of Release:	Compromised 8" steel disposal line
Volume of Release:	7 bbls
Volume Recovered:	0 bbls

## Remediation Specifications

Remediation Parameters:	In the areas of SP1, SP2, SP3, SP4, and SP6, excavate to a depth of 6 inches. In the area of SP5, excavate to a depth of 1 foot. Backfill the site with clean soil.	
Remediation Activities:	December 2016	
Plan Sent to OCD:	09/23/2016	Email from Cliff Brunson to Mike Bratcher
OCD Approval of Plan:	09/28/2016	Email from Mike Bratcher to Cliff Brunson
Plan Sent to BLM:	09/23/2016	Email from Cliff Brunson to Shelly Tucker
BLM Approval of Plan:	10/04/2016	Email from Shelly Tucker to Cliff Brunson

## Supporting Documentation

Initial C-141	Signed 07/07/2016
Final C-141	Signed 01/11/2017
Site Diagram	July 2016
Groundwater Plot	<50'
TOPO Maps	July 2016
Lab Summary	07/11/2016-07/12/2016
Lab Analysis	07/11/2016-07/12/2016
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.

01/20/2016

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

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.

**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	Rocky Hills SWD #001	Facility Type	Well
Surface Owner	BLM	Mineral Owner	API No. 30-015-30112

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
O	19	21S	24E					Eddy County, NM

Latitude N 32.45842° Longitude W 104.53439°

**NATURE OF RELEASE**

Type of Release	Produced water	Volume of Release	7 bbls	Volume Recovered	0 bbls
Source of Release	Compromised 8" steel disposal line	Date and Hour of Occurrence	06/25/2016	Date and Hour of Discovery	
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	Mike Bratcher, Heather Patterson- NMOCD; Shelly Tucker- BLM		
By Whom?	Kathy@ BBC International, Inc.	Date and Hour	06/27/2016 @ 2:49 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.\*

A compromised 8" steel disposal line caused 7 bbls of produced water to spill. No fluids were recovered and the line was repaired.

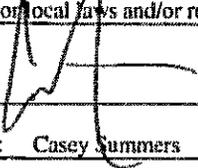
Describe Area Affected and Cleanup Action Taken.\*

The affected area is approximately 200' x 10' both on and off location. Remediation will be completed in accordance with a remediation plan approved by both 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.

**OIL CONSERVATION DIVISION**

Signature:



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

Date: 7-7-16 Phone: (575) 513-8289

\* Attach Additional Sheets If Necessary

District I  
1625 N. French Dr., Hobbs, NM 88240  
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State of New Mexico  
Energy Minerals and Natural Resources

Form C-141  
Revised August 8, 2011

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1220 South St. Francis Dr.  
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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	PO Box 4294; Houston, TX 77210	Telephone No.	(575) 513-8289
Facility Name	Rocky Hills SWD #001	Facility Type	Well
Surface Owner	BLM	Mineral Owner	
		API No.	30-015-30112

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
O	19	21S	24E					Eddy County, NM

Latitude N 32.45842° Longitude W 104.53439°

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Source of Release	Compromised 8" steel disposal line	Date and Hour of Occurrence	06/25/2016	Date and Hour of Discovery	
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	Mike Bratcher, Heather Patterson- NMOCD; Shelly Tucker- BLM		
By Whom?	Kathy@ BBC International, Inc.	Date and Hour	06/27/2016 @ 2:49 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.\*  
A compromised 8" steel disposal line caused 7 bbls of produced water to spill. No fluids were recovered and the line was repaired.

Describe Area Affected and Cleanup Action Taken.\*  
The affected area is approximately 200' x 10' both on and off location. Remediation was completed in accordance with the remediation plan approved by Mike Bratcher of NMOCD via email on 09/28/2016 and approved by Shelly Tucker of the BLM via email on 10/04/2016.

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:	<u>OIL CONSERVATION DIVISION</u>		
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: 1-11-17	Phone: (575) 513-8289		

\* Attach Additional Sheets If Necessary



# Groundwater Plot

## Oxy Rocky Hills SWD #001

County  
Eddy

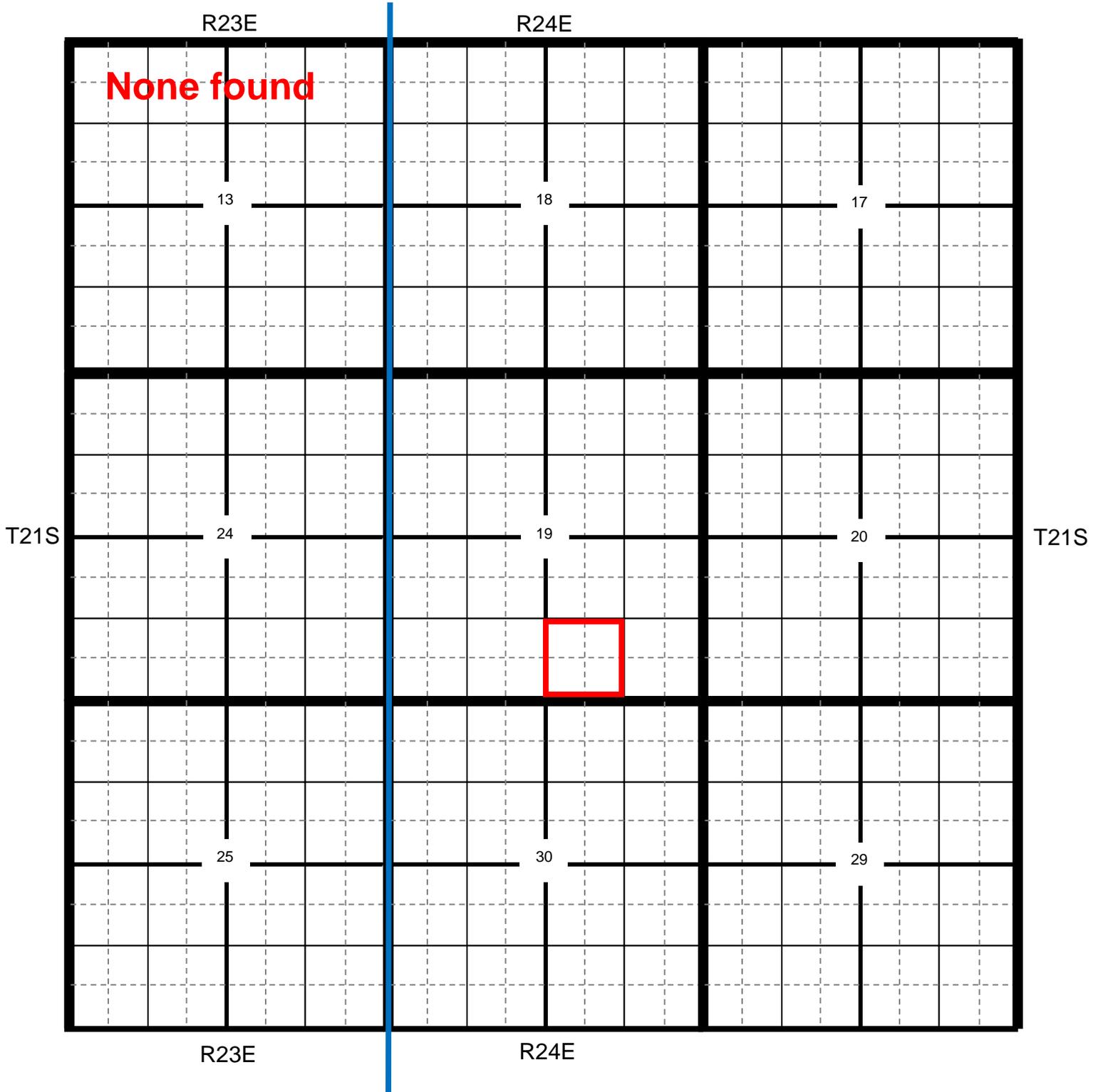
Unit Letter  
O

Section  
19

Township  
21S

Range  
24E

Trend Map <50'



📍 Location

● OCD

● USGS

● SEO

● All Databases

## Oxy Rocky Hills SWD #001

County Eddy      Unit Letter O      Section 19      Township 21S      Range 24E

Trend Map <50'

1

2

NW/NW <b>None found</b>	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	<b>SW/SE</b>	SE/SE
Unit Letter M	Unit Letter N	Unit Letter O	Unit Letter P

3

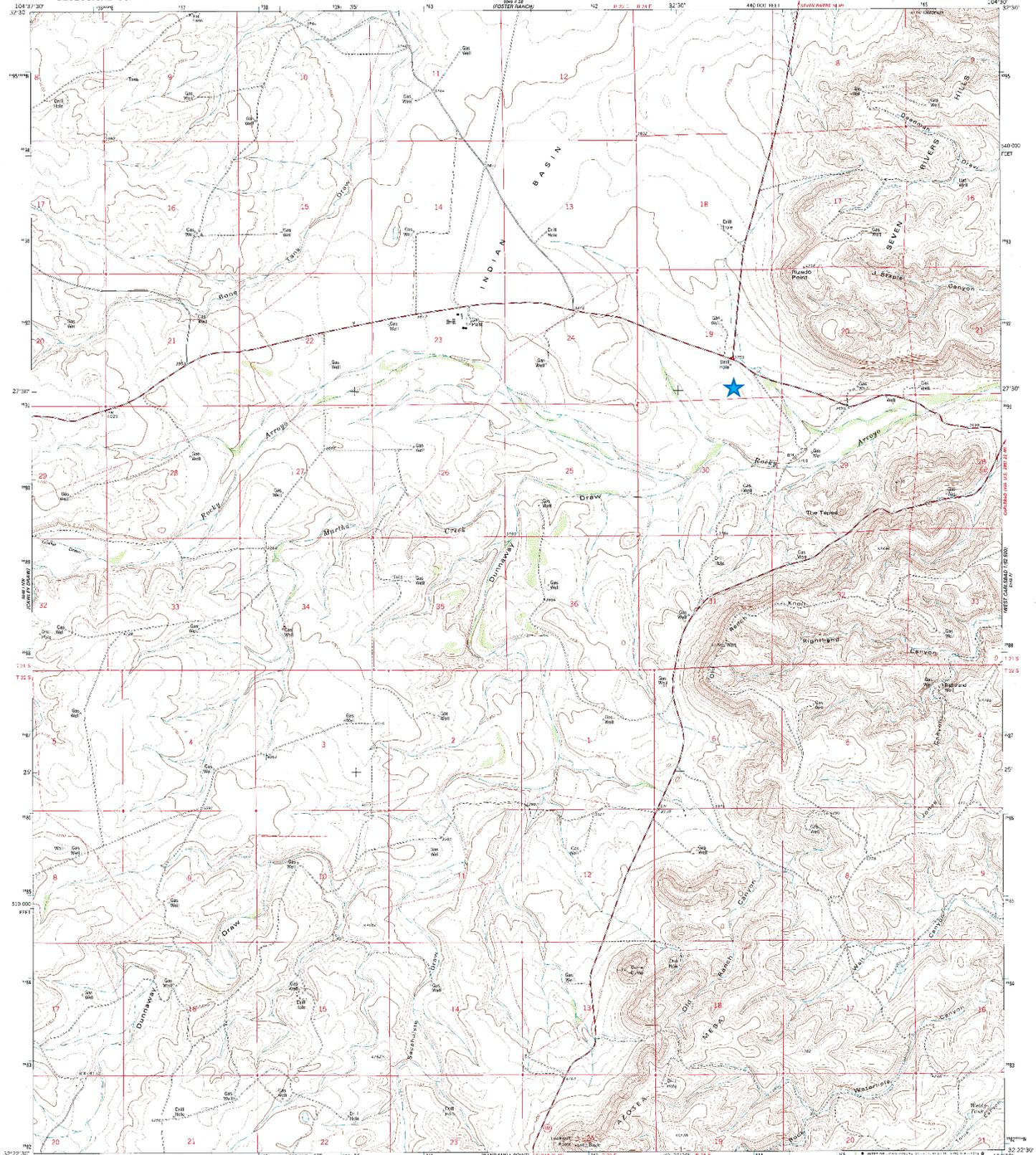
4

# Oxy

## Rocky Hills SWD #001

MARTHA CREEK QUADRANGLE  
NEW MEXICO—EDDY CO.  
7.5 MINUTE SERIES (TOPOGRAPHIC)  
NEAR MARIANNA POST, G. QUADRANGLE

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
GEOLOGICAL SURVEY



Mapped, edited, and published by the Geological Survey  
Control by USGS and NOS/NOAA  
Topography by photogrammetric methods from aerial photographs  
taken 1975. Field checked 1974. Map edited 1978  
Projection and 10,000-foot grid ticks: New Mexico  
coordinate system, east zone (Transverse Mercator)  
1000-meter interval. Transverse Mercator grid ticks,  
zone 13, shown in blue. 1927 North American datum  
Fine red dashes: Lines indicate selected fence lines



SCALE 1:24,000  
CONTOUR INTERVAL 20 FEET  
NATIONAL GEODESIC VERTICAL DATUM OF 1929



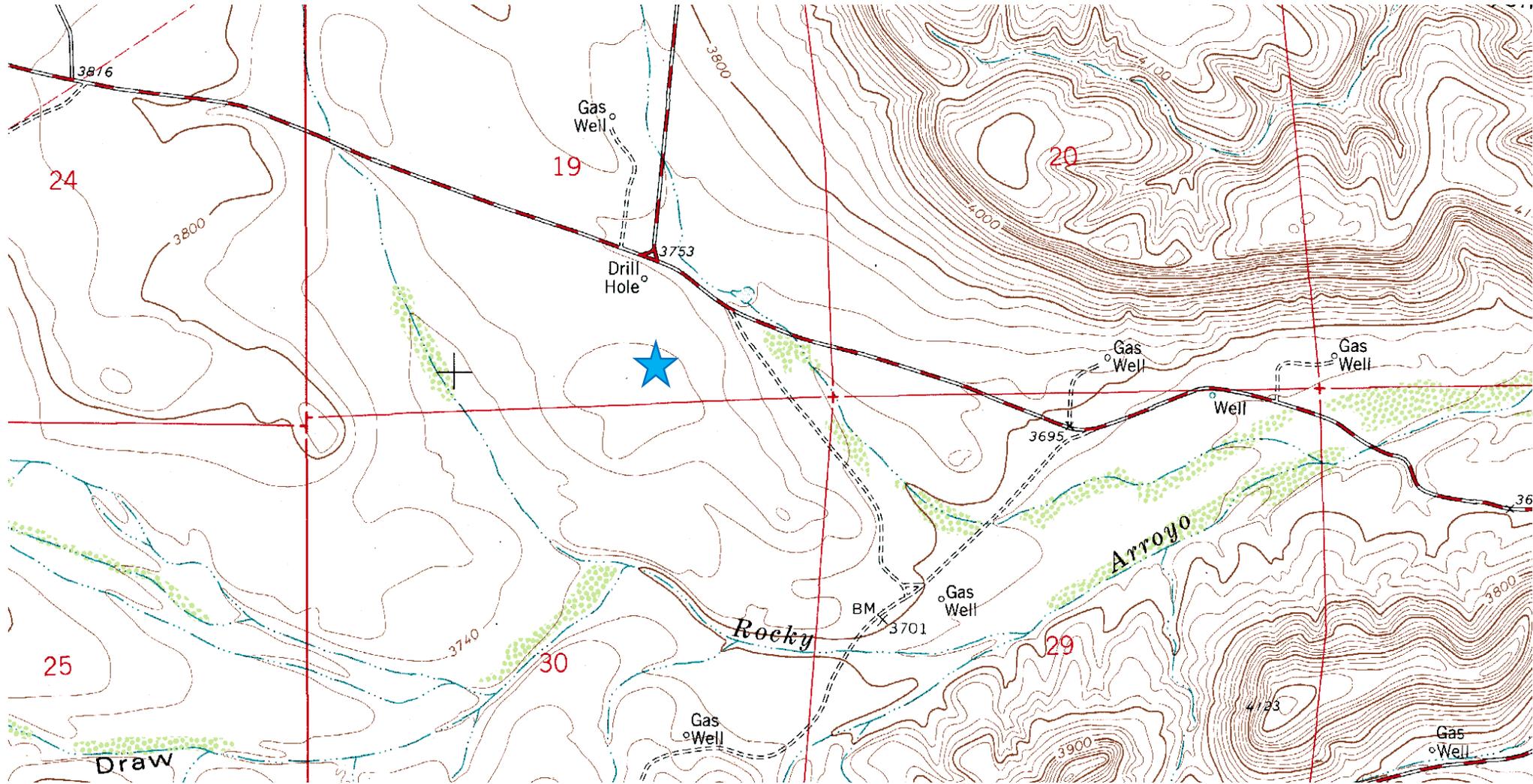
ROAD CLASSIFICATION  
Primary highway — Light gray road, hard or  
hard surface — Improved surface  
Secondary highway — Red line road  
Road surface — Unimproved road  
Road surface — 10.5 ft. to 15 ft. — Stone Road

THIS MAP COMPILED WITH NATIONAL MAP ACCURACY STANDARDS  
FOR SALE BY U. S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225, OR RESTON, VIRGINIA 22092  
A FULLER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

MARTHA CREEK, N. MEX.  
1978  
AMA 9048 1 NE DENVER 1981

# Oxy

## Rocky Hills SWD #001



**Laboratory Analytical Results Summary  
Rocky Hills SWD #1**

Analyte	Method	Sample Date	SP1 @ SURFACE	SP1 @ 1'	SP1 @ 1.5'
			7/11/16	7/11/16	7/12/16
			mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		n/a	<0.050	n/a
Toluene	BTEX 8021B		n/a	<0.050	n/a
Ethylbenzene	BTEX 8021B		n/a	<0.050	n/a
Total Xylenes	BTEX 8021B		n/a	<0.150	n/a
Total BTEX	BTEX 8021B		n/a	<0.300	n/a
Chloride	SM4500Cl-B		5860	240	240
GRO	TPH 8015M		n/a	<10.0	n/a
DRO	TPH 8015M		n/a	857	n/a

Analyte	Method	Sample Date	SP5 @ SURFACE	SP5 @ 1'	SP5 @ 1.5'
			7/11/16	7/11/16	7/12/16
			mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		n/a	n/a	n/a
Toluene	BTEX 8021B		n/a	n/a	n/a
Ethylbenzene	BTEX 8021B		n/a	n/a	n/a
Total Xylenes	BTEX 8021B		n/a	n/a	n/a
Total BTEX	BTEX 8021B		n/a	n/a	n/a
Chloride	SM4500Cl-B		1760	1320	256
GRO	TPH 8015M		n/a	n/a	n/a
DRO	TPH 8015M		n/a	n/a	n/a

Analyte	Method	Sample Date	SP2 @ SURFACE	SP2 @ 1'	SP2 @ 1.5'
			7/11/16	7/11/16	7/12/16
			mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		n/a	n/a	n/a
Toluene	BTEX 8021B		n/a	n/a	n/a
Ethylbenzene	BTEX 8021B		n/a	n/a	n/a
Total Xylenes	BTEX 8021B		n/a	n/a	n/a
Total BTEX	BTEX 8021B		n/a	n/a	n/a
Chloride	SM4500Cl-B		2680	416	224
GRO	TPH 8015M		n/a	n/a	n/a
DRO	TPH 8015M		n/a	n/a	n/a

Analyte	Method	Sample Date	SP6 @ SURFACE	SP6 @ 1'	SP6 @ 1.5'
			7/11/16	7/11/16	7/12/16
			mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		n/a	n/a	n/a
Toluene	BTEX 8021B		n/a	n/a	n/a
Ethylbenzene	BTEX 8021B		n/a	n/a	n/a
Total Xylenes	BTEX 8021B		n/a	n/a	n/a
Total BTEX	BTEX 8021B		n/a	n/a	n/a
Chloride	SM4500Cl-B		2880	464	384
GRO	TPH 8015M		n/a	n/a	n/a
DRO	TPH 8015M		n/a	n/a	n/a

Analyte	Method	Sample Date	SP3 @ SURFACE	SP3 @ 1'
			7/11/16	7/11/16
			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		688	80
GRO	TPH 8015M		n/a	<10.0
DRO	TPH 8015M		n/a	<10.0

Analyte	Method	Sample Date	SP4 @ SURFACE	SP4 @ 1'	SP4 @ 1.5'
			7/11/16	7/11/16	7/12/16
			mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		n/a	n/a	n/a
Toluene	BTEX 8021B		n/a	n/a	n/a
Ethylbenzene	BTEX 8021B		n/a	n/a	n/a
Total Xylenes	BTEX 8021B		n/a	n/a	n/a
Total BTEX	BTEX 8021B		n/a	n/a	n/a
Chloride	SM4500Cl-B		1520	448	128
GRO	TPH 8015M		n/a	n/a	n/a
DRO	TPH 8015M		n/a	n/a	n/a



July 21, 2016

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: ROCKY HILLS SWD #1

Enclosed are the results of analyses for samples received by the laboratory on 07/14/16 15:45.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. 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 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:	07/14/2016	Sampling Date:	07/11/2016
Reported:	07/21/2016	Sampling Type:	Soil
Project Name:	ROCKY HILLS SWD #1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	INDIAN BASIN		

**Sample ID: SP 1 @ SURFACE (H601586-01)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>5860</b>	16.0	07/19/2016	ND	416	104	400	0.00	

**Sample ID: SP 1 @ 1' (H601586-02)**

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	07/18/2016	ND	2.13	107	2.00	0.111	
Toluene*	<0.050	0.050	07/18/2016	ND	2.18	109	2.00	0.365	
Ethylbenzene*	<0.050	0.050	07/18/2016	ND	2.10	105	2.00	0.234	
Total Xylenes*	<0.150	0.150	07/18/2016	ND	6.33	106	6.00	0.107	
Total BTEX	<0.300	0.300	07/18/2016	ND					

Surrogate: 4-Bromofluorobenzene (PID) 102 % 73.6-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>240</b>	16.0	07/19/2016	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	07/18/2016	ND	173	86.5	200	1.10	
<b>DRO &gt;C10-C28</b>	<b>857</b>	10.0	07/18/2016	ND	180	90.2	200	3.58	

Surrogate: 1-Chlorooctane 72.0 % 35-147

Surrogate: 1-Chlorooctadecane 104 % 28-171

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:	07/14/2016	Sampling Date:	07/12/2016
Reported:	07/21/2016	Sampling Type:	Soil
Project Name:	ROCKY HILLS SWD #1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	INDIAN BASIN		

**Sample ID: SP 1 @ 1.5' (H601586-03)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	240	16.0	07/19/2016	ND	416	104	400	0.00	

**Sample ID: SP 2 @ SURFACE (H601586-04)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2680	16.0	07/19/2016	ND	416	104	400	0.00	

**Sample ID: SP 2 @ 1' (H601586-05)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	416	16.0	07/19/2016	ND	416	104	400	0.00	

**Sample ID: SP 2 @ 1.5' (H601586-06)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	224	16.0	07/19/2016	ND	416	104	400	0.00	

**Sample ID: SP 3 @ SURFACE (H601586-07)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	688	16.0	07/19/2016	ND	416	104	400	0.00	

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:	07/14/2016	Sampling Date:	07/11/2016
Reported:	07/21/2016	Sampling Type:	Soil
Project Name:	ROCKY HILLS SWD #1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	INDIAN BASIN		

**Sample ID: SP 3 @ 1' (H601586-08)**

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	07/18/2016	ND	2.13	107	2.00	0.111	
Toluene*	<0.050	0.050	07/18/2016	ND	2.18	109	2.00	0.365	
Ethylbenzene*	<0.050	0.050	07/18/2016	ND	2.10	105	2.00	0.234	
Total Xylenes*	<0.150	0.150	07/18/2016	ND	6.33	106	6.00	0.107	
Total BTEX	<0.300	0.300	07/18/2016	ND					

*Surrogate: 4-Bromofluorobenzene (PID) 102 % 73.6-140*

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>80.0</b>	16.0	07/19/2016	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	07/18/2016	ND	173	86.5	200	1.10	
DRO >C10-C28	<10.0	10.0	07/18/2016	ND	180	90.2	200	3.58	

*Surrogate: 1-Chlorooctane 67.6 % 35-147*
*Surrogate: 1-Chlorooctadecane 74.6 % 28-171*
**Sample ID: SP 4 @ SURFACE (H601586-09)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>1520</b>	16.0	07/19/2016	ND	416	104	400	0.00	

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:	07/14/2016	Sampling Date:	07/11/2016
Reported:	07/21/2016	Sampling Type:	Soil
Project Name:	ROCKY HILLS SWD #1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	INDIAN BASIN		

**Sample ID: SP 4 @ 1' (H601586-10)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	448	16.0	07/19/2016	ND	416	104	400	0.00	

**Sample ID: SP 4 @ 1.5' (H601586-11)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	128	16.0	07/19/2016	ND	416	104	400	0.00	

**Sample ID: SP 5 @ SURFACE (H601586-12)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1760	16.0	07/19/2016	ND	416	104	400	0.00	

**Sample ID: SP 5 @ 1' (H601586-13)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1320	16.0	07/19/2016	ND	416	104	400	0.00	

**Sample ID: SP 5 @ 1.5' (H601586-14)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	256	16.0	07/19/2016	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: 07/14/2016  
 Reported: 07/21/2016  
 Project Name: ROCKY HILLS SWD #1  
 Project Number: NONE GIVEN  
 Project Location: INDIAN BASIN

 Sampling Date: 07/11/2016  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 6 @ SURFACE (H601586-15)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2880	16.0	07/19/2016	ND	416	104	400	0.00	

**Sample ID: SP 6 @ 1' (H601586-16)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	464	16.0	07/19/2016	ND	416	104	400	3.77	

**Sample ID: SP 6 @ 1.5' (H601586-17)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	384	16.0	07/19/2016	ND	416	104	400	3.77	

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Celey D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

- QM-07      The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
- 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**  
 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 State: NM Zip: 88241 Company: \_\_\_\_\_

City: Hobbs Attn: \_\_\_\_\_

Phone #: 575-397-6388 Fax #: 575-397-0397 Address: \_\_\_\_\_

Project #: \_\_\_\_\_ Project Owner: \_\_\_\_\_ City: \_\_\_\_\_

Project Name: Betty Hills JWD #111 State: \_\_\_\_\_ Zip: \_\_\_\_\_

Project Location: No. in Basin Phone #: \_\_\_\_\_

Sampler Name: HFT One 125 Fax #: \_\_\_\_\_

FOR LAB USE ONLY

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						DATE	TIME	ANALYSIS REQUEST							
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :			ACID/BASE:	ICE / COOL	OTHER :					
H601586	SP105UR		1	X						7.11	830								
	1/12		1	X						7.12	845								
	SP205UR		1	X						7.11	933								
	1/12		1	X						7.11	954								
	SP305UR		1	X						7.12	1019								
	1/12		1	X						7.11	1045								
	SP405UR		1	X						7.11	1105								
	1/12		1	X						7.11	1111								

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Relinquished By: \_\_\_\_\_ Date: 7.14.12 Received By: \_\_\_\_\_  
 Time: \_\_\_\_\_

Relinquished By: \_\_\_\_\_ Date: 7.14.12 Received By: \_\_\_\_\_  
 Time: \_\_\_\_\_

Delivered By: (Circle One) \_\_\_\_\_  
 Sample - UPS - Bus - Other: \_\_\_\_\_

Sample Condition: Cool  Intact   
 Yes  No  Yes  No

CHECKED BY: \_\_\_\_\_  
 REMARKS: \_\_\_\_\_



**ARDINAL 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 State: NM Zip: 88241 Attn:  
 Phone #: 575-397-6388 Fax #: 575-397-0397 Address:  
 Project #: Project Owner: DRY City: State: Zip:  
 Project Name: Rocky Hills Sub #1  
 Project Location: Ind. Basin  
 Sampler Name: BTEX TPH

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						DATE	TIME	CL- BTEX TPH
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :			
H1001586												
11	SP9 0 1 1/2	G 1	1	X	X	X	X	X	7-12	11/8	X	
12	SP5 0 5 1/2	G 1	1	X	X	X	X	X	7-11	11/30	X	
13		G 1	1	X	X	X	X	X	7-11	11/5-2	X	
14		G 1	1	X	X	X	X	X	7-12	11/95	X	
15	SP 6 0 5 1/2	G 1	1	X	X	X	X	X	7-11	11/1	X	
16		G 1	1	X	X	X	X	X	7-11	11/40	X	
17		G 1	1	X	X	X	X	X	7-12	11/5	X	

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Relinquished By: [Signature] Date: 7-14-16  
 Received By: [Signature] Date: 7-14-16  
 Relinquished By: [Signature] Date: 7-14-16  
 Received By: [Signature] Date: 7-14-16  
 Delivered By: (Circle One) [Signature] Sample Condition: Cool  Intact   
 Sampler - UPS - Bus - Other: -6.80  Yes  No  Yes  No  
 CHECKED BY: [Signature] (Initials) [Signature]  
 Phone Result:  Yes  No Add'l Phone #:  
 Fax Result:  Yes  No Add'l Fax #:  
 REMARKS:

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

# 75

**From:** [Bratcher, Mike, EMNRD](#)  
**To:** [Cliff Brunson](#)  
**Cc:** [Patterson, Heather, EMNRD](#); [Casey Summers](#); [Jennifer\\_Duarte@oxy.com](#); [Ken Swinney](#); [Jennifer Gilkey](#); [Kathy Purvis](#); [Tucker, Shelly](#)  
**Subject:** RE: OXY - Rocky Hills SWD #001 - Remediation Plan  
**Date:** Wednesday, September 28, 2016 1:26:37 PM

---

RE: OXY USA \* Rocky Hills SWD 1 \* 2RP-3772 \* DOR: 6/25/16

Cliff,

Your proposal for remediation of the above referenced release is approved. Please advise once remedial activities have been scheduled. Federal sites require like approval from BLM.

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](mailto:cbrunson@bbcinternational.com)]  
**Sent:** Friday, September 23, 2016 11:13 AM  
**To:** Bratcher, Mike, EMNRD  
**Cc:** Patterson, Heather, EMNRD; Casey Summers; Jennifer\_Duarte@oxy.com; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** OXY - Rocky Hills SWD #001 - Remediation Plan

Mike,

This e-mail is to confirm our discussion concerning the remediation plan for the OXY Rocky Hills SWD #001 release. I have attached the information packet that we used in our discussion with a cover page describing the remediation plan that we agreed upon.

If you would please reply back via e-mail with your concurrence on this 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](mailto:cbrunson@bbcinternational.com)



\*\*\*\*\*

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\*\*\*\*\*

**From:** [Tucker, Shelly](#)  
**To:** [Bratcher, Mike, EMNRD](#)  
**Cc:** [Cliff Brunson](#); [Patterson, Heather, EMNRD](#); [Casey Summers](#); [Jennifer Duarte@oxy.com](mailto:Jennifer_Duarte@oxy.com); [Ken Swinney](#); [Jennifer Gilkey](#); [Kathy Purvis](#)  
**Subject:** Re: OXY - Rocky Hills SWD #001 - Remediation Plan  
**Date:** Tuesday, October 4, 2016 10:12:29 AM

---

Cliff,

BLM approves your proposal as written. Please contact me when activities begin.

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 Wed, Sep 28, 2016 at 1:26 PM, Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)> wrote:

RE: OXY USA \* Rocky Hills SWD 1 \* 2RP-3772 \* DOR: 6/25/16

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If you would please reply back via e-mail with your concurrence on this 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](mailto:cbrunson@bbcinternational.com)



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