



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

December 21, 2016

Attn: Crystal Weaver

New Mexico Energy, Minerals, & Natural Resources
Oil Conservation Division, Environmental Bureau – District 2
811 S. First St.
Artesia, NM 88210

**RE: Termination Request Report
BOPCO – Big Eddy Unit Hackberry 34 Federal #001
UL/A sec. 34 T19S R31E
API No. 30-015-40288
2RP-3376**

Ms. Weaver:

BOPCO, LP (BOPCO) has retained Basin Environmental Service Technologies (Basin) to address potential environmental concerns at the above-referenced site.

Background and Previous Work

The site is located approximately 17 miles southwest of Maljamar, New Mexico at Unit Letter A of Section 34 in Township 19 South of Range 31 East. The longitude is 32.622136 and the latitude is -103.850901. This site is located in an area where no known groundwater exists within a five and one-half (5.5) mile radius. (Figure 1).

On October 25th, 2015, BOPCO discovered a release of approximately nine-hundred twenty-seven (927) barrels (bbls) of produced water from a failed connection on the charge pump by-pass line. An estimated three-hundred ninety (390) bbls were recovered. Approximately twenty-seven thousand forty-five (27,045) square feet (ft²) of fenced battery pad was affected by the release. The Bureau of Land Management (BLM) and New Mexico Oil Conservation Division (NMOCD) were notified of the release on October 25th, 2015, and an initial Release Notification and Corrective Action form (C-141) was submitted to NMOCD November 3rd, 2015, for approval (Appendix A).

BOPCO personnel, as soon as possible, excavated the heaviest saturated soils and disposed of them at a NMOCD approved facility. One-hundred thirty-two (132) cubic yards (yd³) of highly impacted soils were disposed.

Basin personnel were on site November 16th, 2016, to assess the impact from the release. The impacted area was sampled in three (3) separate areas until field screens showed delineation was

complete. The discreet soil samples of approximate one-foot increments in depth from the 3 sample points were retrieved and submitted to a certified NMOCD approved commercial laboratory for confirmatory analysis of chloride (Cl⁻) concentration. Location of sample points can be found on Figure 2 – Initial Sampling Data.

Laboratory analysis shows the impacted areas of the release met the criteria necessary for closure of the release.

Soil samples collected from the BOPCO Big Eddy Unit Hackberry 34 Federal #001 release site were analyzed by an NMOCD approved laboratory, and concentrations of chloride were below the recommended remediation action level (RRAL) established for the site (Appendix B). Soil exhibiting chloride concentrations above the RRAL were removed and disposed of at a BLM/NMOCD approved facility. BOPCO via Basin requests site closure to the Big Eddy Unit Hackberry 34 Federal #001 release site.

Photo documentation of the release and remediation activities can be found in Appendix C.

Basin appreciates the opportunity to work with you on this project. Please contact me if you have any questions or wish to discuss the site.

Sincerely,



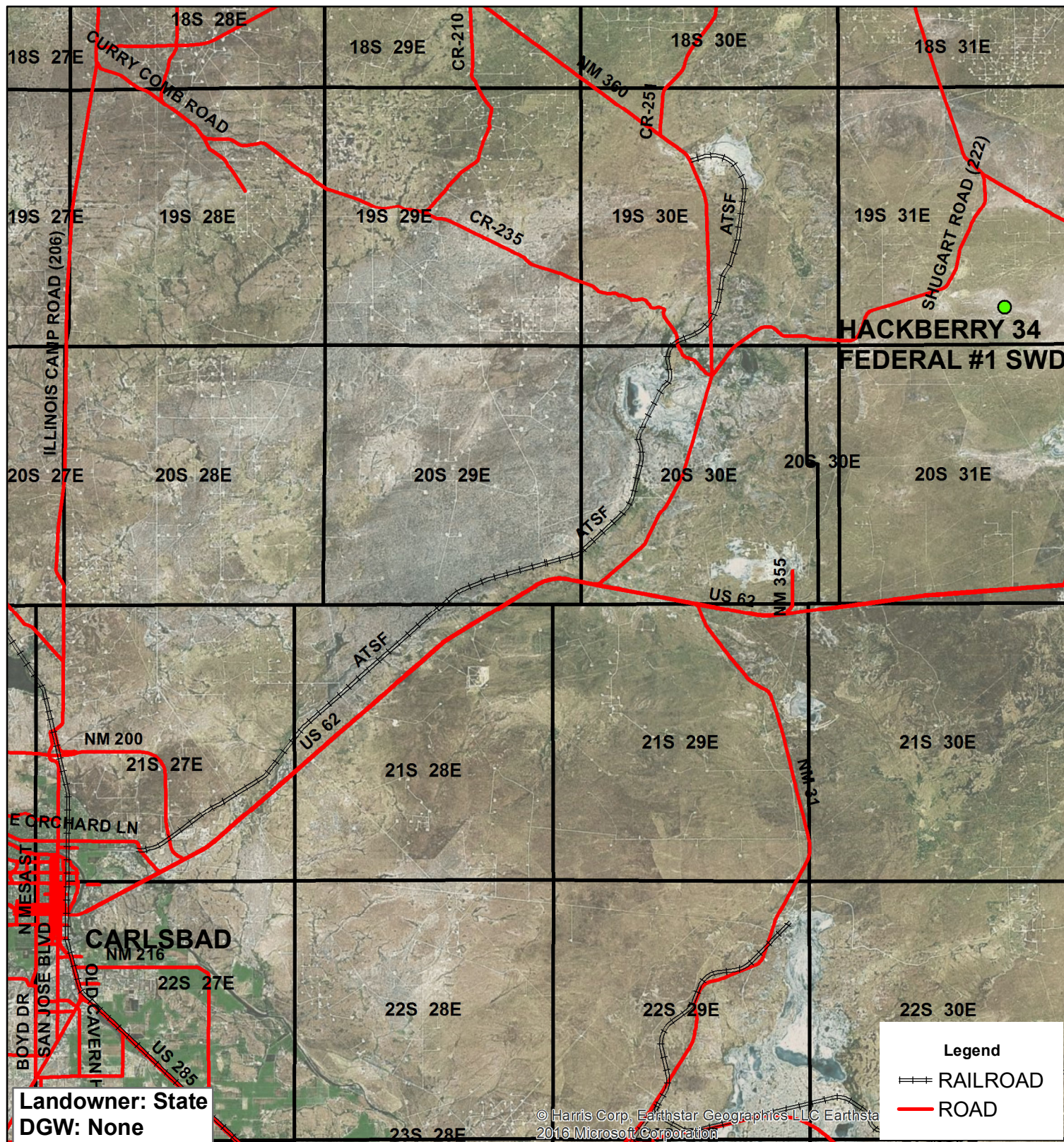
Robbie Runnels
Project Manager
Basin Environmental Service Technologies
(575) 393-2967

Attachments:

- Figure 1 – Site Location Map
- Figure 2 - Initial sampling Data
- Appendix A – Final C-141
- Appendix B – Laboratory Analysis
- Appendix C – Photo Documentation

FIGURES

Geographic Location

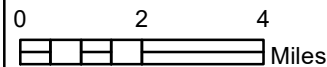


BOPCO
HACKBERRY 34
FEDERAL #1 SWD
 2RP-3376

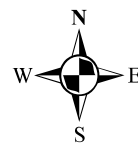
UL A SECTION 34
 T-19-S R-31-E
 EDDY COUNTY, NM

GPS: 32.622094 -103.851073

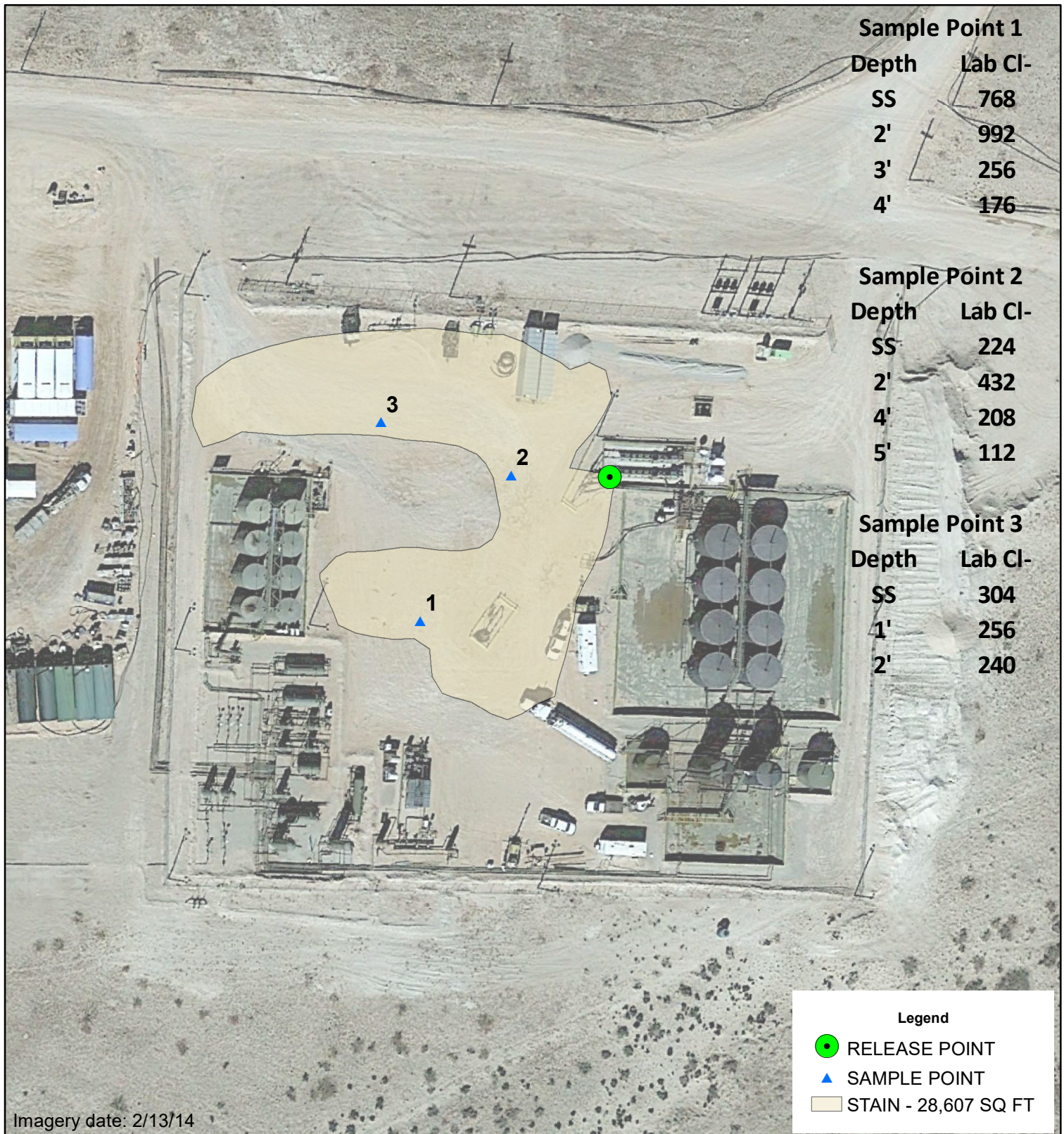
Figure 1



Drawing date: 12/21/16
 Drafted by: T. Grieco



Initial Sampling



APPENDICES

APPENDIX – A

Final C-141

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: BOPCO, L.P.	Contact: Amy Ruth	
Address: 522 W. Mermod, Suite 704 Carlsbad, N.M. 88220	Telephone No. 575-887-7329	
Facility Name: BEU Hackberry 34 Federal #001	Facility Type: Tank Battery/SWD	
Surface Owner: Federal	Mineral Owner: Federal	API No. 30-015-40288

LOCATION OF RELEASE

Unit Letter A	Section 34	Township 19S	Range 31E	Feet from the 800	North/South Line North	Feet from the 825	East/West Line East	County Eddy
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Latitude 32.622136° Longitude -103.850901°

NATURE OF RELEASE

Type of Release Produced Water	Volume of Release 927 bbls	Volume Recovered 390 bbls
Source of Release Charge pump connection	Date and Hour of Occurrence 10/25/2015 time unknown	Date and Hour of Discovery 10/25/2015 12 pm
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Mike Bratcher/Heather Patterson (NMOCD), Jim Amos (BLM)	
By Whom? Brad Blevins	Date and Hour 10/25/2015 7 pm	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. N/A	

If a Watercourse was Impacted, Describe Fully.*

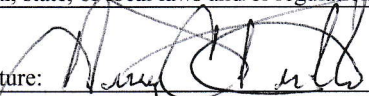
Describe Cause of Problem and Remedial Action Taken.*

A connection on the charge pump by-pass line failed. The connection was repaired.

Describe Area Affected and Cleanup Action Taken.*

The leak affected 27,045 square feet of caliche pad within the fenced battery area. Vacuum trucks recovered standing fluids. The impacted area was scraped and 132 cubic yards of saturated caliche surface soils were removed to a NMOCD approved disposal facility. In November, 2016, soil samples were collected and sent to a commercial laboratory for chloride analysis. Chlorides throughout the soil profile were confirmed to be below the recommended action level.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	OIL CONSERVATION DIVISION	
Printed Name: Amy Ruth	Approved by Environmental Specialist:	
Title: Environmental Supervisor	Approval Date:	Expiration Date:
E-mail Address: ACRuth@basspet.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 1/4/2017	Phone: 432-661-0571	

* Attach Additional Sheets If Necessary

APPENDIX – B

Analytical Results

November 17, 2016

ROBBIE RUNNELS

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: HACKBERRY SWD

Enclosed are the results of analyses for samples received by the laboratory on 11/16/16 15:50.

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.

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,



Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

Basin Environmental Service
ROBBIE RUNNELS
P.O. Box 301
Lovington NM, 88260
Fax To: (575) 396-1429

Received: 11/16/2016
Reported: 11/17/2016
Project Name: HACKBERRY SWD
Project Number: NONE GIVEN
Project Location: EDDY COUNTY, NM

Sampling Date: 11/16/2016
Sampling Type: Soil
Sampling Condition: ** (See Notes)
Sample Received By: Jodi Henson

Sample ID: SP 1 @ SURFACE (H602578-01)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	768	16.0	11/17/2016	ND	416	104	400	0.00	

Sample ID: SP 1 @ 2' (H602578-02)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	992	16.0	11/17/2016	ND	416	104	400	0.00	

Sample ID: SP 1 @ 3' (H602578-03)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	256	16.0	11/17/2016	ND	416	104	400	0.00	

Sample ID: SP 1 @ 4' (H602578-04)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	11/17/2016	ND	416	104	400	0.00	

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

Basin Environmental Service
ROBBIE RUNNELS
P.O. Box 301
Lovington NM, 88260
Fax To: (575) 396-1429

Received: 11/16/2016
Reported: 11/17/2016
Project Name: HACKBERRY SWD
Project Number: NONE GIVEN
Project Location: EDDY COUNTY, NM

Sampling Date: 11/16/2016
Sampling Type: Soil
Sampling Condition: ** (See Notes)
Sample Received By: Jodi Henson

Sample ID: SP 2 @ SURFACE (H602578-05)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	224	16.0	11/17/2016	ND	416	104	400	0.00		

Sample ID: SP 2 @ 1' (H602578-06)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	432	16.0	11/17/2016	ND	416	104	400	0.00		

Sample ID: SP 2 @ 4' (H602578-07)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	208	16.0	11/17/2016	ND	416	104	400	0.00		

Sample ID: SP 2 @ 5' (H602578-08)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	112	16.0	11/17/2016	ND	416	104	400	0.00		

Sample ID: SP 3 @ SURFACE (H602578-09)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	304	16.0	11/17/2016	ND	416	104	400	0.00		

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

Basin Environmental Service
ROBBIE RUNNELS
P.O. Box 301
Lovington NM, 88260
Fax To: (575) 396-1429

Received: 11/16/2016
Reported: 11/17/2016
Project Name: HACKBERRY SWD
Project Number: NONE GIVEN
Project Location: EDDY COUNTY, NM

Sampling Date: 11/16/2016
Sampling Type: Soil
Sampling Condition: ** (See Notes)
Sample Received By: Jodi Henson

Sample ID: SP 3 @ 1' (H602578-10)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	256	16.0	11/17/2016	ND	416	104	400	0.00	

Sample ID: SP 3 @ 2' (H602578-11)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	240	16.0	11/17/2016	ND	416	104	400	0.00	

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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

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476



Company Name: <u>Basik</u>		P.O. #:		BILL TO																							
Project Manager: <u>Robbie Kunhels</u>		Company: <u>Bobco</u>		ANALYSIS REQUEST																							
Address:		Attn: <u>Amy Ruth</u>																									
City:		Address:																									
Phone #:		City:																									
Fax #:		State:																									
Project #:		Zip:																									
Project Name: <u>Hackberry SW</u>		City:																									
Project Location: <u>Eddy County</u>		State:																									
Sampler Name: <u>Robbie Kunhels</u>		Phone #:																									
FOR LAB USE ONLY		Fax #:																									
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX				PRESERV.	SAMPLING																		
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :															
<u>H1602578</u>	<u>SP10 Surface</u>	<u>6</u>	<u>1</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>11/16/16</u>	<u>0930</u>	<u>✓</u>												
<u>1</u>	<u>SP10 2'</u>	<u>6</u>	<u>1</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>11/16/16</u>	<u>0957</u>	<u>✓</u>												
<u>2</u>	<u>SP10 3'</u>	<u>1</u>	<u>1</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>1000</u>	<u>✓</u>	<u>✓</u>												
<u>3</u>	<u>SP10 4'</u>	<u>1</u>	<u>1</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>1010</u>	<u>✓</u>	<u>✓</u>												
<u>4</u>	<u>SP20 Surface</u>	<u>1</u>	<u>1</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>1030</u>	<u>✓</u>	<u>✓</u>												
<u>5</u>	<u>SP20 1'</u>	<u>1</u>	<u>1</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>1100</u>	<u>✓</u>	<u>✓</u>												
<u>6</u>	<u>SP20 4'</u>	<u>1</u>	<u>1</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>1130</u>	<u>✓</u>	<u>✓</u>												
<u>7</u>	<u>SP20 5'</u>	<u>1</u>	<u>1</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>1145</u>	<u>✓</u>	<u>✓</u>												
<u>8</u>	<u>SP30 Surface</u>	<u>1</u>	<u>1</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>1230</u>	<u>✓</u>	<u>✓</u>												
<u>9</u>	<u>SP30 1'</u>	<u>1</u>	<u>1</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>1240</u>	<u>✓</u>	<u>✓</u>												
<u>10</u>	<u>SP30 1'</u>	<u>1</u>	<u>1</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>11/16/16</u>	<u>1240</u>	<u>✓</u>												

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 the client for the 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 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 services hereunder by Cardinal regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By: <u>[Signature]</u>	Date: <u>11/16/16</u>	Received By: <u>[Signature]</u>	Time: <u>3:30</u>	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #: _____	Add'l Fax #: _____
REMARKS:							

Delivered By: (Circle One) #75 25.82 Sample Condition ☐ Cool ☒ Intact ☐ Yes ☒ No

Sampler - UPS - Bus - Other: #75 25.82 ☐ Yes ☒ No

Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page 7 of 7

APPENDIX – C

Photo Documentation

Big Eddy Unit, Hackberry 34 Federal #001

Unit Letter A, Section 34, T19S, R31E



Initial release, facing south

10/25/15



Initial release, facing northwest

10/25/15



Initial release, facing north

10/25/15



Initial release, facing northeast

10/25/15