Closure Report

Site Description					
Site Name:	Cedar Canyon 23 Federal #33H				
Company:	Oxy USA Inc.				
Legal Description:	U/L I, Section 22, T24E, T29E				
County:	Eddy County, NM				
GPS Coordinates:	N 32.20205° W-103.96723°				

Release Data					
Date of Release:	08/10/2017				
Type of Release:	Produced water				
Source of Release:	Compromised poly line				
Volume of Release:	12 bbls				
Volume Recovered:	9 bbls				

Remediation Specifications							
Remediation Parameters:	Excavated the areas around SP1-SP5 to a depth of 2 feet. Excavated the areas around SP6 and SP7 to a depth of 1 foot. Backfilled the site with clean soil.						
Remediation Activities:	08/06/2018 to 0	8/14/2018					
Plan Sent to OCD:	11/25/2017	Email from Cliff Brunson to Mike Bratcher					
OCD Approval of Plan:	03/05/2018	Email from Mike Bratcher to Cliff Brunson					
Plan Sent to BLM:	11/25/2017 Email from Cliff Brunson to Shelly Tucker						
BLM Approval of Plan:	12/26/2017	Email from Shelly Tucker to Cliff Brunson					

Supporting Documentation						
Initial C-141	Signed 08/14/2014					
Final C-141	Upon completion					
Site Diagram	October 2017					
Groundwater Plot	100'					
TOPO Maps	October 2017					
Lab Summary	10/16/2017-10/17/2017					
Lab Analysis	10/16/2017-10/17/2017					
Correspondence	Request and approval of remediation plan via email					

Request for Closure

Based on the completion of the remediation plan, Oxy Permian requests closure approval from NMOCD.

Wade Dittrich, Environmental Specialist

08/20/2018

NM OIL CONSERVATION

ARTESIA DISTRICT

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Anesia, 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

AUG 1 4 2017

Form C-141 Revised April 3, 2017

Oil Conservation Division 1220 South St. Francis Dr. Submit LCony to appropriate District Office in RECEIVaccordance with 19.15.29 NMAC.

			D-1-			, INIVI 873		-4.5		
Release Notification and Corrective Action OPERATOR Initial Report Final Report										
				nant.		OPERA?			al Report	Final Report
Name of Co		OXY USA İ 294; HOUS		<u> 10091</u>			VADE DITTRIC			
Facility Nar				DERAL #33H		Telephone I Facility Typ		2828		
Tacinty Ivai	ile CED	ARCANIC	/IV 23 I*I20	JERAL #33H		raciity ryp	e WELL			
Surface Ow	ner BLN	И		Mineral C	wner	BLM		API No	. 30-01:	5-44074
				LOCA	TION	OF RE	LEASE			
Unit Letter	Section	Township	Range	Fect from the	North	South Line	Feet from the	East/West Line		County
<u> </u>	22	24E	29E	2344	S	OUTH	1199	EAST		EDDY
			Latitu	de_ 32.2020942	2 _ Lon	gitude 10	3.9676325	NAD83		
						OF RELI				
Type of Rele	es PRO	DUCED WAT	rep	1427	UINE	Volume of		is Volume I	Recovered	9 bbls
1.7pt of Neie	: 110	JUULD WA	~~			1	ED WATER	a volumen	VVICU	> 00ts
Source of Re	lease 1.5	inch poly line	connected	to chemical trail	er	Date and F	lour of Occurrence	e Date and	Hour of Di	scovery
failure			Wayta ,			8/10/2017				
Was Immedi	ate Notice (Var [7]	No Not Re	souired.	If YES, To		D; CRYSTAL WI	EAVED NA	AOCD: SHELLY
		12A	1 V3 LJ		.quiicu	TUCKER-	BLM		PARA 2 417	energy and the bell t
By Whom?		NTTRICH	***************************************				lour 8-11-2017			
Was a Water	course Reac			N7		If YES, V	olume Impacting I	he Watercourse.		
		نا	Yes 🛭	No						
		em and Reme			failure.	The leak has	been repaired and	d is back in service		
The affected	area of the		FT, Leak d	lid not leave the l				measurements are	subject to c	change with GPS
regulations a public health should their o or the environ	I operators or the envi- operations hament. In a	are required to ronment. The save failed to a	o report an acceptance odequately OCD accept	d/or file certain reports of a C-141 report investigate and reports to the contract of the con	elease non by the emediate	otifications a e NMOCD m e contaminat	nd perform correct parked as "Final Ricon that pose a thr	inderstand that pur ctive actions for re- leport" does not re- ceat to ground wate responsibility for o	leases which lieve the oper, surface w	h may endanger erator of liability vater, human health
Signature:	Was	lesta	Ž.			Annroved hi	OIL CON Environmental S	SERVATION	DIVISI	
Printed Name	: WADE	DITTRICH				pp. 0.00 ()			for	
Title: ENV	IROMENT	TAL COORD	INATOR			Approval Da	ie: 8 15 11	Expiration	Date: N	14
E-mail Addre	ess: wade	dittrich@ox	y.com			Conditions of	f Approval:	chad	Attache	12.12
	/2017		Pho	ne: 575-390-2	828	Occ	NIIN .	LVUM	\perp \dot{o}	KV4346
Attach Addi	tional She	ets If Necess	агу							

Operator/Responsible Party,

The OCD has received the form C-141 you provided on 8/14/17 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number <u>ARP-4342</u> has been assigned. Please refer to this case number in all future correspondence.

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

The responsible person shall complete <u>division-approved corrective action</u> for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District II office in Artesia on or before 9/14/17. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.
- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.
- Nominal detection limits for field and laboratory analyses must be provided.
- Composite sampling is not generally allowed.
- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

- •Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.
- If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.
- Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring
 wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit
 either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should
 not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location
 and fieldwork is recommended, especially if unusual circumstances are encountered.

Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.

Jim Griswold

OCD Environmental Bureau Chief 1220 South St. Francis Drive Santa Fe, New Mexico 87505 505-476-3465 jim.griswold@state.nm.us

Weaver, Crystal, EMNRD

From: Wade_Dittrich@oxy.com

Sent: Monday, August 14, 2017 10:45 AM

To: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD

Cc: stucker@blm.gov; cbrunson@bbcinternational.com; kathy@bbcinternational.com;

kswinney@bbcinternational.com; jgilkey@bbcinternational.com;

Jennifer_Smith@oxy.com

Subject: Cedar Canyon 23 Fed. Com 0033H

Attachments: Scanned from a Xerox Multifunction Device

All,

Attached is the Initial C-141. Please review and let me know if there any questions. Thank you.

Wade Dittrich

Environmental Coordinator Oxy Permian-New Mexico 575.390.2828 cell Wade_Dittrich@Oxy.com

Weaver, Crystal, EMNRD

From:

Wade_Dittrich@oxy.com

Sent:

Friday, August 11, 2017 11:35 AM

To:

Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD

Cc:

stucker@blm.gov; cbrunson@bbcinternational.com; kathy@bbcinternational.com;

kswinney@bbcinternational.com; jgilkey@bbcinternational.com;

Jennifer_Smith@oxy.com

Subject:

Cedar Canyon 23 Fed. Com 0033H

All,

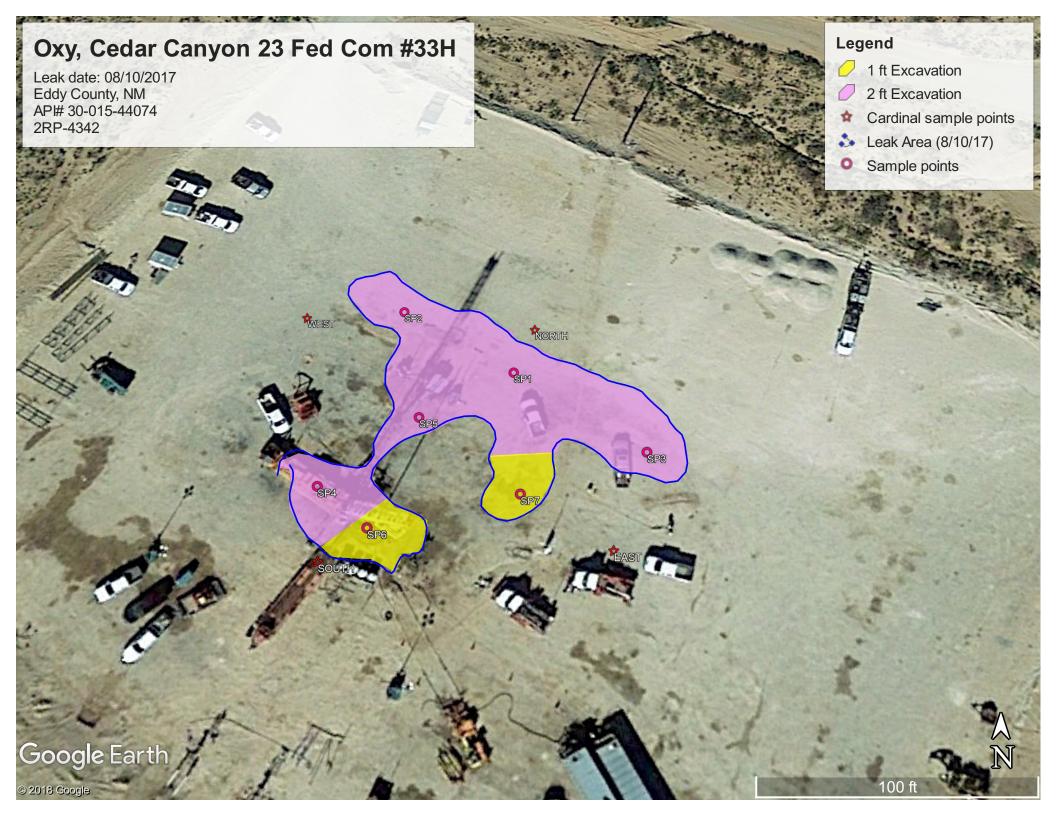
This is to inform you that Oxy Permian had a **Reportable** release in **Eddy County** at the <u>Cedar Canyon 23 Fed. Com</u> #0033H on 8/10/2017.

- Release Location: Legal -22-24S-29E, API: 30-015-44074
- Release Volume: 0 bbls of Oil and 12 bbls of Produced Water.
- Recovered: 9 bbls recovered
- Cause of Release: 1.5 inch poly line connected to chemical trailer failure
- Approximate Area impacted by release: 10x25 FT, Leak did not leave the location-9 bbls inside cont. -3
 outside (measurements are subject to change with GPS tracking)
- GPS Coordinates and Driving Direction: 32.2020942 ,-103.9676325 Follow GPS to site.

Please let me know if you have any questions.

Wade Dittrich

Environmental Coordinator
Oxy Permian-New Mexico
575.390.2828 cell
Wade_Dittrich@Oxy.com



Oxy, Cedar Canyon 23 Fed Com #33H

Sample notes, hand auger/backhoe

SP1, N 32.20228 W-103.96744

SP2, N 32.20237 W-103.96760

SP3, N 32.20217 W-103.96726

SP4, N 32.20213 W-103.96770

SP5, N 32.20222 W-103.96757

SP6, N 32.20208 W-103.96763

SP7, N 32.20212 W-103.96743

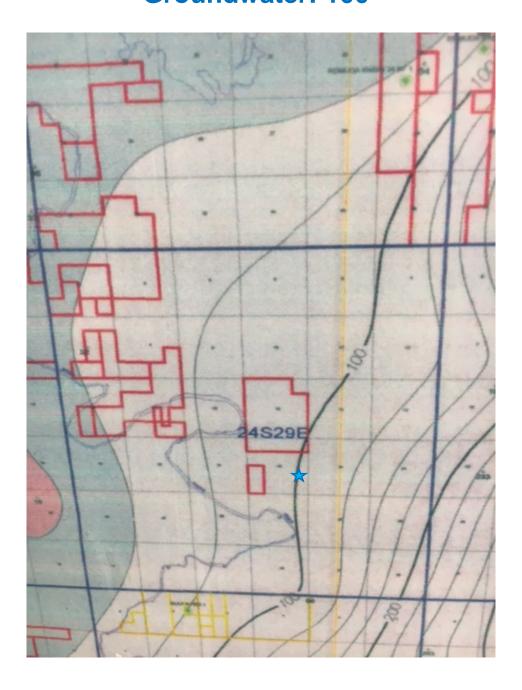
NORTH, N 32.20234 W-103.96741

SOUTH, N 32.20204 W-103.96769

EAST, N 32.20205 W-103.96731

WEST, N 32.20236 W-103.96774

Oxy, Cedar Canyon 23 Federal #33H U/L I, Section 22, T24S, R29E Groundwater: 100'





New Mexico Office of the State Engineer Water Column/Average Depth to Water

(quarters are 1=NW 2=NE 3=SW 4=SE) (quarters are smallest to largest) (NAD83 UTM in meters)

No records found.

UTMNAD83 Radius Search (in meters):

Easting (X): 597468 **Northing (Y):** 3563195 **Radius:** 1700

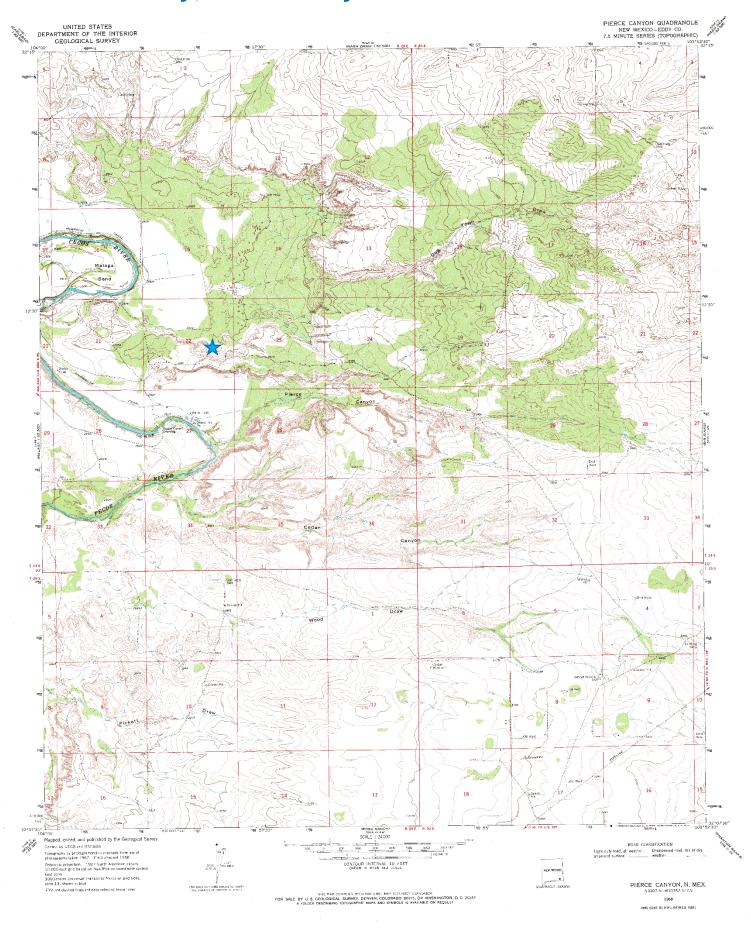
The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

10/3/17 4:40 PM

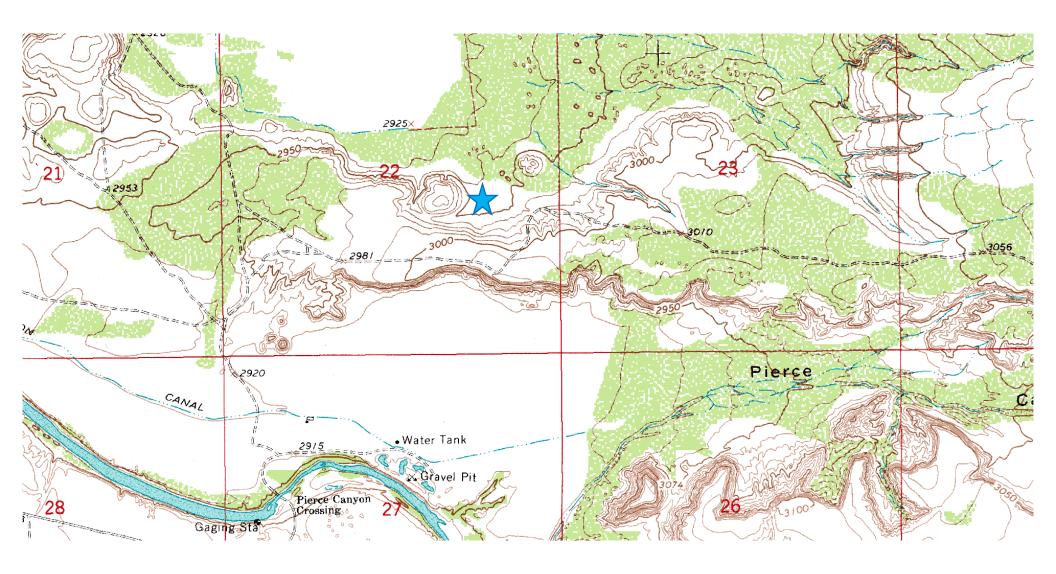
WATER COLUMN/ AVERAGE DEPTH TO WATER

Q64:	Public Land Survey System (PLSS) Q16: NE Q4: SE Sec: 22 Tws: 24S Rng: 29E								
X: ft	State Plane Coordinate System - NAD27 X: ft Y: ft Zone:								
X: ft	State Plane Coordinate System - NAD83 Y: ft Zone:								
Longitude (X): Latitude (Y):									
Easting (X):	UTM - NAD27 Easting (X): mtrs Northing (Y): mtrs Zone:								
All Conversion Results are displayed as NAD 1983 UTM Zone 13 Easting (X): 597468.0 mtrs Northing (Y): 3563195.0 mtrs ~~ Please keep screen open to copy UTM values for Reports. ~~									

Oxy, Cedar Canyon 23 Federal #33H



Oxy, Cedar Canyon 23 Federal #33H



Laboratory Analytical Results Summary Cedar Canyon 23 Fed Com #033H

		Sample ID	SP1 @ 1'	SP1 @ 2'	SP1 @ 3'	SP1 @ 4'	SP1 @ 9'
Analyte	Method	Date	10/16/17	10/16/17	10/16/17	10/16/17	10/16/17
			mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Benzene	BTEX 8021B		< 0.050	n/a	n/a	n/a	n/a
Toluene	BTEX 8021B		< 0.050	n/a	n/a	n/a	n/a
Ethylbenzene	BTEX 8021B		< 0.050	n/a	n/a	n/a	n/a
Total Xylenes	BTEX 8021B		<0.150	n/a	n/a	n/a	n/a
Total BTEX	BTEX 8021B		< 0.300	n/a	n/a	n/a	n/a
Chloride	SM4500CI-B		4080	1420	384	160	48
GRO	TPH 8015M		<10.0	n/a	n/a	n/a	n/a
DRO	TPH 8015M		<10.0	n/a	n/a	n/a	n/a
EXT DRO	TPH 8015M		<10.0	n/a	n/a	n/a	n/a

		Sample ID	SP2 @ 1'	SP2 @ 2'	SP2 @ 3'	SP2 @ 4'	SP2 @ 9'
Analyte	Method	Date	10/16/17	10/16/17	10/16/17	10/16/17	10/16/17
			mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Chloride	SM4500CI-B		4880	1280	368	144	32

		Sample ID	SP3 @ 1'	SP3 @ 2'	SP3 @ 3'	SP3 @ 4'	SP3 @ 9'
Analyte	Method	Date	10/16/17	10/16/17	10/16/17	10/16/17	10/16/17
			mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Chloride	SM4500CI-B		4960	832	496	80	32

		Sample ID	SP4 @ 1'	SP4 @ 2'	SP4 @ 3'	SP4 @ 8'
Analyte	Method	Date	10/16/17	10/16/17	10/16/17	10/16/17
			mg/kg	mg/kg	mg/kg	mg/kg
Chloride	SM4500CI-B		800	864	192	48

		Sample ID	SP5 @ 1'	SP5 @ 2'	SP5 @ 3'	SP5 @ 8'
Analyte	Method	Date	10/16/17	10/17/17	10/17/17	10/17/17
			mg/kg	mg/kg	mg/kg	mg/kg
Benzene	BTEX 8021B		< 0.050	n/a	n/a	n/a
Toluene	BTEX 8021B		< 0.050	n/a	n/a	n/a
Ethylbenzene	BTEX 8021B		< 0.050	n/a	n/a	n/a
Total Xylenes	BTEX 8021B		<0.150	n/a	n/a	n/a
Total BTEX	BTEX 8021B		< 0.300	n/a	n/a	n/a
Chloride	SM4500CI-B		608	848	176	48
GRO	TPH 8015M		<10.0	n/a	n/a	n/a
DRO	TPH 8015M		17.3	n/a	n/a	n/a
EXT DRO	TPH 8015M		<10.0	n/a	n/a	n/a

		Sample ID	SP6 @ 1'	SP6 @ 2'	SP6 @ 7'
Analyte	Method	Date	10/17/17	10/16/17	10/16/17
			mg/kg	mg/kg	mg/kg
Benzene	BTEX 8021B		< 0.050	n/a	n/a
Toluene	BTEX 8021B		< 0.050	n/a	n/a
Ethylbenzene	BTEX 8021B		< 0.050	n/a	n/a
Total Xylenes	BTEX 8021B		<0.150	n/a	n/a
Total BTEX	BTEX 8021B		< 0.300	n/a	n/a
Chloride	SM4500CI-B		560	192	112
GRO	TPH 8015M		<10.0	n/a	n/a
DRO	TPH 8015M		<10.0	n/a	n/a
EXT DRO	TPH 8015M		<10.0	n/a	n/a

		Sample ID	SP7 @ Surface	SP7 @ 1'	SP7 @ 6'
Analyte	Method	Date	10/16/17	10/16/17	10/16/17
			mg/kg	mg/kg	mg/kg
Chloride	SM4500CI-B		992	160	80

CARDINAL POINTS	5	Sample ID	NORTH @ SURFACE	EAST @ SURFACE	WEST @ SURFACE	SOUTH @ SURFACE
Analyte	Method	Date	10/16/17	10/17/17	10/17/17	10/17/17
			mg/kg	mg/kg	mg/kg	mg/kg
Chloride	SM4500CI-B		128	112	112	112



October 27, 2017

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: CEDAR CANYON 23 FED 33H

Enclosed are the results of analyses for samples received by the laboratory on 10/20/17 16:15.

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/ga/lab accred certif.html.

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

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

Accreditation applies to public drinking water matrices.

Celey D. Keine

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



BBC International, Inc.

Cliff Brunson P.O. Box 805 Hobbs NM, 88241

Fax To: (575) 397-0397

Received: 10/20/2017 Sampling Date: 10/16/2017

Reported: 10/27/2017 Sampling Type: Soil

Project Name: CEDAR CANYON 23 FED 33H Sampling Condition: Cool & Intact
Project Number: 08/10/17 Sample Received By: Jodi Henson

Project Location: MALAGA

Sample ID: SP1 @ 1 (H702887-01)

BTEX 8021B	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/25/2017	ND	1.83	91.3	2.00	1.51	
Toluene*	<0.050	0.050	10/25/2017	ND	1.84	91.9	2.00	2.45	
Ethylbenzene*	<0.050	0.050	10/25/2017	ND	1.81	90.7	2.00	1.94	
Total Xylenes*	<0.150	0.150	10/25/2017	ND	5.42	90.3	6.00	1.92	
Total BTEX	<0.300	0.300	10/25/2017	ND					
Surrogate: 4-Bromofluorobenzene (PID	102 9	% 72-148	}						
Chloride, SM4500CI-B	mg/	'kg	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	4080	16.0	10/25/2017	ND	432	108	400	0.00	
TPH 8015M	mg/	'kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	10/24/2017	ND	174	86.8	200	4.40	
DRO >C10-C28	<10.0	10.0	10/24/2017	ND	185	92.6	200	5.21	
EXT DRO >C28-C36	<10.0	10.0	10/24/2017	ND					
Surrogate: 1-Chlorooctane	69.2	% 28.3-16	4						
Surrogate: 1-Chlorooctadecane	77.0	% 34.7-15	7						

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 whistoever 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 related only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



BBC International, Inc.

Cliff Brunson P.O. Box 805 Hobbs NM, 88241

Fax To: (575) 397-0397

Received: 10/20/2017 Sampling Date: 10/16/2017

Reported: 10/27/2017 Sampling Type: Soil

Project Name: CEDAR CANYON 23 FED 33H Sampling Condition: Cool & Intact
Project Number: 08/10/17 Sample Received By: Jodi Henson

Project Location: MALAGA

Sample ID: SP1 @ 2 (H702887-02)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1420	16.0	10/25/2017	ND	432	108	400	0.00	
Sample ID: SP1 @ 3 (H7	02887-03)								
Sample ID: SP1 @ 3 (H7	-	/kg	Analyze	d By: HM					
•	-	/kg Reporting Limit	Analyze Analyzed	d By: HM Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier

Sample ID: SP1 @ 4 (H702887-04)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	160	16.0	10/25/2017	ND	432	108	400	0.00	

Sample ID: SP1 @ 9 (H702887-05)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	10/25/2017	ND	432	108	400	0.00	QR-03

Sample ID: SP2 @ 1 (H702887-06)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	4880	16.0	10/25/2017	ND	432	108	400	0.00	

Cardinal Laboratories *=Accredited Analyte

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Cliff Brunson P.O. Box 805 Hobbs NM, 88241

Fax To: (575) 397-0397

Received: 10/20/2017 Sampling Date: 10/16/2017

Reported: 10/27/2017 Sampling Type: Soil

Project Name: CEDAR CANYON 23 FED 33H Sampling Condition: Cool & Intact
Project Number: 08/10/17 Sample Received By: Jodi Henson

Project Location: MALAGA

Sample ID: SP2 @ 2 (H702887-07)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1280	16.0	10/25/2017	ND	432	108	400	0.00	
Sample ID: SP2 @ 3 (H7	02887-08)								
Chloride, SM4500CI-B	mg	/kg	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	368	16.0	10/25/2017	ND	432	108	400	0.00	

Sample ID: SP2 @ 4 (H702887-09)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	144	16.0	10/25/2017	ND	432	108	400	0.00	

Sample ID: SP2 @ 9 (H702887-10)

Chloride, SM4500CI-B	mg,	/kg	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	10/25/2017	ND	432	108	400	0.00	

Sample ID: SP3 @ 1 (H702887-11)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	4960	16.0	10/25/2017	ND	432	108	400	0.00	

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Received: 10/20/2017 Sampling Date: 10/16/2017

Reported: 10/27/2017 Sampling Type: Soil

Project Name: CEDAR CANYON 23 FED 33H Sampling Condition: Cool & Intact
Project Number: 08/10/17 Sample Received By: Jodi Henson

Project Location: MALAGA

Sample ID: SP3 @ 2 (H702887-12)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	832	16.0	10/25/2017	ND	432	108	400	0.00	
Sample ID: SP3 @ 3 (H7	02887-13)								
Sample ID: SP3 @ 3 (H7 Chloride, SM4500Cl-B	-	/kg	Analyze	d By: HM					
•	-	/kg Reporting Limit	Analyze Analyzed	d By: HM Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier

Sample ID: SP3 @ 4 (H702887-14)

Chloride, SM4500Cl-B	Analyze	d By: HM							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	10/25/2017	ND	432	108	400	0.00	

Sample ID: SP3 @ 9 (H702887-15)

Chloride, SM4500CI-B	mg,	/kg	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	10/25/2017	ND	432	108	400	0.00	

Sample ID: SP4 @ 1 (H702887-16)

Chloride, SM4500CI-B	mg	/kg	Analyze						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	800	16.0	10/25/2017	ND	432	108	400	0.00	

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Fax To: (575) 397-0397

Received: 10/20/2017 Sampling Date: 10/16/2017

Reported: 10/27/2017 Sampling Type: Soil

Project Name: CEDAR CANYON 23 FED 33H Sampling Condition: Cool & Intact
Project Number: 08/10/17 Sample Received By: Jodi Henson

Project Location: MALAGA

Sample ID: SP4 @ 2 (H702887-17)

Chloride, SM4500Cl-B mg/kg Analyzed By: HM Analyte Result Reporting Limit Analyzed Method Blank BS % Recovery True Value QC RPD Qualifier Chloride 864 10/25/2017 ND 432 108 400 0.00 16.0

Sample ID: SP4 @ 3 (H702887-18)

Chloride, SM4500Cl-B Analyzed By: HM mg/kg Reporting Limit Analyzed BS True Value QC RPD Qualifier Analyte Result Method Blank % Recovery Chloride 192 16.0 10/25/2017 432 400 0.00 ND 108

Sample ID: SP4 @ 8 (H702887-19)

Chloride, SM4500Cl-B	mg,	/kg	Analyze						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	10/25/2017	ND	432	108	400	0.00	

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Fax To: (575) 397-0397

Received: 10/20/2017 Sampling Date: 10/16/2017

Reported: 10/27/2017 Sampling Type: Soil

Project Name: CEDAR CANYON 23 FED 33H Sampling Condition: Cool & Intact Sample Received By: Project Number: 08/10/17 Jodi Henson

Project Location: MALAGA

Sample ID: SP5 @ 1 (H702887-20)

BTEX 8021B	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/25/2017	ND	1.83	91.3	2.00	1.51	
Toluene*	<0.050	0.050	10/25/2017	ND	1.84	91.9	2.00	2.45	
Ethylbenzene*	<0.050	0.050	10/25/2017	ND	1.81	90.7	2.00	1.94	
Total Xylenes*	<0.150	0.150	10/25/2017	ND	5.42	90.3	6.00	1.92	
Total BTEX	<0.300	0.300	10/25/2017	ND					
Surrogate: 4-Bromofluorobenzene (PID	98.5	% 72-148	}						
Chloride, SM4500Cl-B	mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	608	16.0	10/25/2017	ND	432	108	400	0.00	
TPH 8015M	mg/	'kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	10/24/2017	ND	174	86.8	200	4.40	
DRO >C10-C28	17.3	10.0	10/24/2017	ND	185	92.6	200	5.21	
EXT DRO >C28-C36	<10.0	10.0	10/24/2017	ND					
Surrogate: 1-Chlorooctane	65.8	% 28.3-16	4						
Surrogate: 1-Chlorocetadecane	75.2	0/2 31715	7						

Surrogate: 1-Chlorooctadecane 75.2 % 34.7-157

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Cliff Brunson P.O. Box 805 Hobbs NM, 88241

Fax To: (575) 397-0397

Received: 10/20/2017 Sampling Date: 10/17/2017

Reported: 10/27/2017 Sampling Type: Soil

Project Name: CEDAR CANYON 23 FED 33H Sampling Condition: Cool & Intact
Project Number: 08/10/17 Sample Received By: Jodi Henson

Project Location: MALAGA

Sample ID: SP5 @ 2 (H702887-21)

Chloride, SM4500Cl-B mg/kg Analyzed By: HM Analyte Result Reporting Limit Analyzed Method Blank BS % Recovery True Value QC RPD Qualifier Chloride 848 10/25/2017 ND 432 108 400 0.00 16.0

Sample ID: SP5 @ 3 (H702887-22)

Chloride, SM4500Cl-B Analyzed By: HM mg/kg Reporting Limit Analyzed BS True Value QC RPD Analyte Result Method Blank Qualifier % Recovery Chloride 176 16.0 10/25/2017 432 400 0.00 ND 108

Sample ID: SP5 @ 8 (H702887-23)

Chloride, SM4500CI-B	mg/kg		Analyzed By: HM							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	•
Chloride	48.0	16.0	10/25/2017	ND	432	108	400	0.00		

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Fax To: (575) 397-0397

Received: 10/20/2017 Sampling Date: 10/17/2017

Reported: 10/27/2017 Sampling Type: Soil

Project Name: CEDAR CANYON 23 FED 33H Sampling Condition: Cool & Intact Project Number: Sample Received By: 08/10/17 Jodi Henson

Project Location: MALAGA

Sample ID: SP6 @ 1 (H702887-24)

BTEX 8021B	mg/	'kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/25/2017	ND	1.83	91.3	2.00	1.51	
Toluene*	<0.050	0.050	10/25/2017	ND	1.84	91.9	2.00	2.45	
Ethylbenzene*	<0.050	0.050	10/25/2017	ND	1.81	90.7	2.00	1.94	
Total Xylenes*	<0.150	0.150	10/25/2017	ND	5.42	90.3	6.00	1.92	
Total BTEX	<0.300	0.300	10/25/2017	ND					
Surrogate: 4-Bromofluorobenzene (PID	101 9	% 72-148							
Chloride, SM4500CI-B	mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	560	16.0	10/25/2017	ND	432	108	400	0.00	
TPH 8015M	mg/	'kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	10/24/2017	ND	174	86.8	200	4.40	
DRO >C10-C28	<10.0	10.0	10/24/2017	ND	185	92.6	200	5.21	
EXT DRO >C28-C36	<10.0	10.0	10/24/2017	ND					
Surrogate: 1-Chlorooctane	61.1	% 28.3-16	4						
Surrogate: 1-Chlorooctadecane	67.4	% 34 7-15	7						

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Fax To: (575) 397-0397

Received: 10/20/2017 Sampling Date: 10/16/2017

Reported: 10/27/2017 Sampling Type: Soil

Project Name: CEDAR CANYON 23 FED 33H Sampling Condition: Cool & Intact Project Number: Sample Received By: 08/10/17 Jodi Henson

Project Location: MALAGA

Sample ID: SP6 @ 2 (H76	02887-25)								
Chloride, SM4500CI-B	mg	mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	192	2 16.0 10/23/2017 ND		448	112	400	0.00		
Sample ID: SP6 @ 7 (H70	02887-26)								
Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	10/23/2017	ND	448	112	400	0.00	
Sample ID: SP7 @ SURFA	ACE (H702887	-27)							
Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AC					

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	10/23/2017	ND	448	112	400	0.00	

Sample ID: SP7 @ 1 (H702887-28)

Chloride, SM4500CI-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	160	16.0	10/23/2017	ND	448	112	400	0.00	

Sample ID: SP7 @ 6 (H702887-29)

Chloride, SM4500Cl-B	mg	/kg	Analyze	Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	10/23/2017	ND	448	112	400	0.00	

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Fax To: (575) 397-0397

Received: 10/20/2017 Sampling Date: 10/16/2017

Reported: 10/27/2017 Sampling Type: Soil

Project Name: CEDAR CANYON 23 FED 33H Sampling Condition: Cool & Intact
Project Number: 08/10/17 Sample Received By: Jodi Henson

Project Location: MALAGA

Sample ID: NORTH @ SURFACE (H702887-30)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	128	16.0	10/23/2017	ND	448	112	400	0.00	

Sample ID: EAST @ SURFACE (H702887-31)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	10/23/2017	ND	448	112	400	0.00	

Sample ID: WEST @ SURFACE (H702887-32)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	10/23/2017	ND	448	112	400	0.00	

Sample ID: SOUTH @ SURFACE (H702887-33)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	10/23/2017	ND	448	112	400	0.00	

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Notes and Definitions

QR-03 The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to matrix interference. QC batch

accepted based on LCS and/or LCSD recovery and/or RPD values.

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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ARDIN 101 Ea (505) 3	/
ARDINAL LABORATORIES 101 East Marland, Hobbs, NM 88240 (505) 393-2326 FAX (505) 393-2476	
RATORIES bbs, NM 882 (505) 393-2476	
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(505) 202 2226 EAY (505) 393-2476	-
(505) 393-2326 FAX (500) 500 = 115	BILL TO ANALYSIS REQUEST
: Cliff Brunson	P.O.#:
30x 805	any: OXY
bbs State: N	Attn: Wade Difficial
Phone #: 575-397-6388 Fax #: 575-397-0397	Address:
Project #: Project Owner: DX	
Project Name: Ceder Congo 23 Fed 33 H 0-1097	State: ZIP:
Project Location: Wz/z \$ C	#
141	PRESERV SAMPLING
ΝP.	34
Sample I.D. PRAB OR (C)ON CONTAINERS ROUNDWATER ASTEWATER DIL	THER: CID/BASE: CE / COOL THER: THER:
GR WA	07 /0 // IC
	1 1005
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200	7736
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service. In no event shall Cardinal be liable for incidental or consequented damages, including window installant regardless of whicher such claim's tassed upon any of the above stated reasons or offerwise. Batterials or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whicher such claim's tassed upon any of the above stated reasons or offerwise. Phone Result: Received By: Received By:	cjam's based upon any of the above stated reasons or otherwise. Phone Result: Yes No Add'l Phone #:
Kelingusined by	
Time; 15 100	1
Sample Co	nominon Chick Control of the Control
Sampler - UPS - Bus - Outer.	No

† Cardinal cannot accept verbal changes. Pledse fax written changes to 505-393-2476 + 25c

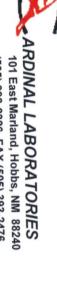
Page 13 of 16

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST



(505) 393-2326	(505) 393-2326 FAX (505) 393-2476	553	ANALYSIS REQUEST
company Name: BBC International, Inc.	ional, Inc.	BILLIO	
roject Manager: Cliff Brunson		P.O. #:	
ddress: P.O. Box 805		Company:	
	State: NM zip: 88241	Attn:	
hone #: 575-397-6388	Fax #: 575-397-0397	Address:	
oroject #:	Project Owner: OXY	City:	1
roject Name: Cook Ce	115E/201 52 co.	State: Zip:	
	7	Phone #:	
1		Fax #:	
Sampler Maine.	MATRIX	X PRESERV. SAMPLING	12/12
	G)RAB OR (C)OMP. CONTAINERS GROUNDWATER WASTEWATER SOIL	SLUDGE OTHER: ACID/BASE: ICE / COOL OTHER:	TIME
1 44 ZOLH	# G W	S 0 / 6 //	04
12 //	₩	2,1	
14.	1 C	2/3	
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† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-24/6 + 252



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

city: Hobbs Address: P.O. Box 805 Project Manager: Cliff Brunson Company Name: BBC International, Inc. Phone #: 575-397-6388 Project #: Sampler Name: Project Location: Project Name: FOR LAB USE ONLY Lab I.D. 3252535 (505) 393-2326 FAX (505) 393-2476 Sample I.D. Project Owner: 0XY Fax #: State: NM Zip: 88241 575-397-0397 (G)RAB OR (C)OMP # CONTAINERS GROUNDWATER WASTEWATER MATRIX SOIL OIL SLUDGE P.O. #: State: City: Phone #: Attn: Company: OTHER Fax #: Address: ACID/BASE: PRESERV. ICE / COOL BILL TO OTHER Zip: DATE SAMPLING by client, its subsidiaries 392 328 2000 1040 TIME 100/ 120 ion of the app ANALYSIS REQUEST

† Cardinal cannot accept verbal changes. Please fax written changes to 505-383-246 +, 250

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Page 15 of 16



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

	(505) 393-2326 FAX (505) 393-2476				BEOLIEST
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Address: P.O. I	30x 805	Company:	/		
city: Hobbs	State: NM Zip: 88241	Attn:	60		
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† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476 dt, 25c

From: Bratcher, Mike, EMNRD

To: Cliff Brunson; Shelly Tucker

Cc: Weaver, Crystal, EMNRD; Wade Dittrich; Jennifer Smith@oxy.com; Ken Swinney; Jennifer Gilkey; Kathy Purvis

Subject: RE: OXY Cedar Canyon 23 Fed Com #33H (2RP-4342) - Delineation Workplan

Date: Monday, March 5, 2018 10:37:07 AM

RE: OXY USA * Cedar Canyon 23 Fed Com 22H * **2RP-4342** * DOR: 8/10/17

Cliff,

Your proposal for remediation of the above referenced release is approved. Federal sites will require like approval from BLM.

Mike Bratcher NMOCD District 2 811 South First Street Artesia, NM 88210 575~748~1283 Ext 108

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.

From: Cliff Brunson [mailto:cbrunson@bbcinternational.com]

Sent: Saturday, November 25, 2017 3:16 PM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Shelly Tucker <stucker@blm.gov>

Cc: Weaver, Crystal, EMNRD < Crystal. Weaver@state.nm.us>; Wade Dittrich

<Wade_Dittrich@oxy.com>; Jennifer_Smith@oxy.com; Ken Swinney

<kswinney@bbcinternational.com>; Jennifer Gilkey <jgilkey@bbcinternational.com>; Kathy Purvis

<kathy@bbcinternational.com>

Subject: OXY Cedar Canyon 23 Fed Com #33H (2RP-4342) - Delineation Workplan

Mike and Shelly,

Please find the attached Delineation Workplan and remediation proposal for the OXY Cedar Canyon 23 Fed Com #33H (2RP-4342). OXY is requesting that you review this plan and is looking forward to both the OCD's and BLM's approval.

If you have any questions, please let me know.

Thanks, Cliff

BBC International, Inc.
World-Wide Environmental Specialists
Mailing Address:
P. O. Box 805
Hobbs, NM 88241-0805 USA
Shipping Address:
1324 W. Marland St.
Hobbs, NM 88240 USA

Phone: (575) 397-6388 Fax: (575) 397-0397

E-Mail: cbrunson@bbcinternational.com



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From: Tucker, Shelly To: Cliff Brunson

Cc: Mike Bratcher; Crystal Weaver; Wade Dittrich; Jennifer Smith@oxy.com; Ken Swinney; Jennifer Gilkey; Kathy

Purvis

Subject: Re: OXY Cedar Canyon 23 Fed Com #33H (2RP-4342) - Delineation Workplan

Date: Tuesday, December 26, 2017 4:10:35 PM

BLM approves your delineation plan for the OXY Cedar Canyon 23 Fed Com #33H (2RP-4342)

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

Sincerely,

Shelly J'Tucker

Environmental Protection Specialist O&G Spill/Release Coordinator

Bureau of Land Management 620 E. Greene St Carlsbad, NM 88220

575.234.5905 - Direct 575.361.0084 - Cellular 575.234.6235 - Emergency Spill Number

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 Sat, Nov 25, 2017 at 3:15 PM, Cliff Brunson < cbrunson@bbcinternational.com> wrote:

Mike and Shelly,

Please find the attached Delineation Workplan and remediation proposal for the OXY Cedar Canyon 23 Fed Com #33H (2RP-4342). OXY is requesting that you review this plan and is looking forward to both the OCD's and BLM's approval.

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



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