

**RECEIVED**

By JKeyes at 9:10 am, Jan 19, 2016

**Closure Report****APPROVED**

By JKeyes at 9:10 am, Jan 19, 2016

**Site Description**

|                    |                               |
|--------------------|-------------------------------|
| Site Name:         | GC Federal 11 Tank Battery    |
| Company:           | COG Operating LLC             |
| Legal Description: | U/L I, Section 19, T17S, R32E |
| County:            | Lea County, NM                |
| GPS Coordinates:   | N 32.81675° W 103.79939°      |

**Release Data**

|                    |                |
|--------------------|----------------|
| Date of Release:   | 08/26/2015     |
| Type of Release:   | Produced water |
| Source of Release: | Tank overflow  |
| Volume of Release: | 445 bbls       |
| Volume Recovered:  | 440 bbls       |

**Remediation Specifications**

|                         |  |  |
|-------------------------|--|--|
| Remediation Parameters: | Excavate to a depth of 3ft around SP1 and place a liner in the excavation. Surface scrape to 6 inches in the area of SP2. Excavate to a depth of 3ft in the areas of SP3 and SP4. Backfill the site with clean soil. |  |
| Remediation Activities: | 12/15/2015 to 12/18/2015   |  |
| Plan Sent to OCD:       | 12/14/2015   | Email from Cliff Brunson to Kellie Jones |
| OCD Approval of Plan:   | 12/15/2015   | Email from Kellie Jones to Cliff Brunson |
| Plan Sent to BLM:       | 12/08/2015   | Email from Cliff Brunson to Dara Glass   |
| BLM Approval of Plan:   | 12/10/2015   | Email from Dara Glass to Cliff Brunson   |

**Supporting Documentation**

|                  |  |
|------------------|--|
| Initial C-141    | Signed 09/09/2015                                  |
| Final C-141      | Signed 01/11/2016                                  |
| Site Diagram     | November 2015                                      |
| Groundwater Plot | 200'   |
| TOPO Maps        | November 2015                                      |
| Lab Summary      | 11/13/2015-11/16/2015                              |
| Lab Analysis     | 11/13/2015-11/16/2015                              |
| Correspondence   | Request and approval of remediation plan via email |

**Request for Closure**

Based on the completion of the remediation plan as agreed upon, BBC International requests closure approval from NMOCD.

Cliff Brunson, President of BBC International Inc.

01/15/2016

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in  
accordance with 19.15.29 NMAC.

## Release Notification and Corrective Action

### OPERATOR

☒ Initial Report ☐ Final Report

|   |                            |         |
|---|----------------------------|---------|
| Name of Company: COG Operating LLC                  | Contact: Robert McNeill    |         |
| Address: 600 West Illinois Avenue, Midland TX 79701 | Telephone No. 432-230-0077 |         |
| Facility Name: GC Federal 11 Tank Battery           | Facility Type: Battery     |         |
| Surface Owner: Federal                              | Mineral Owner:             | API No. |

### LOCATION OF RELEASE

| Unit Letter | Section | Township | Range | Feet from the | North/South Line | Feet from the | East/West Line | County |
|-------------|---------|----------|-------|---------------|------------------|---------------|----------------|--------|
| I           | 19      | 17S      | 32E   |               |                  |               |                | Lea    |

Latitude 32.8171158 Longitude -103.7993851

### NATURE OF RELEASE

|  |   |  |
|--|---|--|
| Type of Release:<br>Produced Water   | Volume of Release:<br>445 bbls PW                         | Volume Recovered:<br>440 bbls PW                 |
| Source of Release:<br>Tank Overflow  | Date and Hour of Occurrence:<br>8/26/2015 8:00 am         | Date and Hour of Discovery:<br>8/26/2015 8:00 am |
| Was Immediate Notice Given?<br><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required | If YES, To Whom?<br>Kellie Jones – NMOCD / Jim Amos – BLM |  |
| By Whom? Amanda Trujillo   | Date and Hour: Thu 8/27/2015 5:36 PM                      |  |
| Was a Watercourse Reached?<br><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  | If YES, Volume Impacting the Watercourse.                 |  |

If a Watercourse was Impacted, Describe Fully.\*

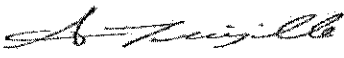
Describe Cause of Problem and Remedial Action Taken.\*

This release was caused by a tank overflow due to a water pump failure. Vacuum trucks were dispatched to recover all standing fluid and repairs were made to equipment.

Describe Area Affected and Cleanup Action Taken.\*

The majority of this release was contained within the lined containment. Approximately, 15 bbls overflowed the containment on to the pad. Concho will have the spill site sampled to delineate any possible contamination from the release and we will present a remediation work plan to the NMOCD for approval prior to any significant remediation work.

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

|  |                                       |                                   |
|--|---------------------------------------|-----------------------------------|
| Signature:  | <b>OIL CONSERVATION DIVISION</b>      |                                   |
| Printed Name: Amanda Trujillo  | Approved by Environmental Specialist: |                                   |
| Title: Senior Environmental Coordinator  | Approval Date:                        | Expiration Date:                  |
| E-mail Address: <a href="mailto:atrujillo@concho.com">atrujillo@concho.com</a>                 | Conditions of Approval:               | Attached <input type="checkbox"/> |
| Date: September 9, 2015 Phone: 575-748-6940  |                                       |                                   |

\* Attach Additional Sheets If Necessary

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
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Form C-141  
Revised August 8, 2011

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accordance with 19.15.29 NMAC.

**Release Notification and Corrective Action**

**OPERATOR**

☐ Initial Report ☒ Final Report

|   |                            |                      |
|---|----------------------------|----------------------|
| Name of Company: COG Operating                      | Contact: Robert McNeill    |                      |
| Address: 600 West Illinois Avenue, Midland TX 79701 | Telephone No. 432-230-0077 |                      |
| Facility Name: GC Federal 11 Tank Battery           | Facility Type: Battery     |                      |
| Surface Owner: Federal                              | Mineral Owner:             | API No. 30-025-38994 |

**LOCATION OF RELEASE**

| Unit Letter | Section | Township | Range | Feet from the | North/South Line | Feet from the | East/West Line | County         |
|-------------|---------|----------|-------|---------------|------------------|---------------|----------------|----------------|
| I           | 19      | 17S      | 32E   |               |                  |               |                | Lea County, NM |

Latitude N 32.81675° Longitude W 103.79939°

**NATURE OF RELEASE**

|  |  |  |
|--|--|--|
| Type of Release: Produced water  | Volume of Release: 445 bbls                          | Volume Recovered: 440 bbls                       |
| Source of Release: Tank overflow   | Date and Hour of Occurrence: 08/26/2015 @ 8:00 am    | Date and Hour of Discovery: 08/26/2015 @ 8:00 am |
| Was Immediate Notice Given?<br><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required | If YES, To Whom?<br>Kellie Jones-NMOCD, Jim Amos-BLM |  |
| By Whom? Amanda Trujillo   | Date and Hour: 1008/27/2015 @ 5:36 pm                |  |
| Was a Watercourse Reached?<br><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  | If YES, Volume Impacting the Watercourse.            |  |

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This release was caused by a tank overflow due to a water pump failure. Vacuum trucks were dispatched to recover all standing fluid and repairs were made to equipment.

Describe Area Affected and Cleanup Action Taken.\*

The majority of this release was contained within the lined containment. Approximately 15 bbls overflowed the containment on to the pad. Remediation was completed in accordance with the remediation plan approved by Kellie Jones of NMOCD via email on 12/15/2015 and approved by Dara Glass of the BLM via email on 12/10/2015.

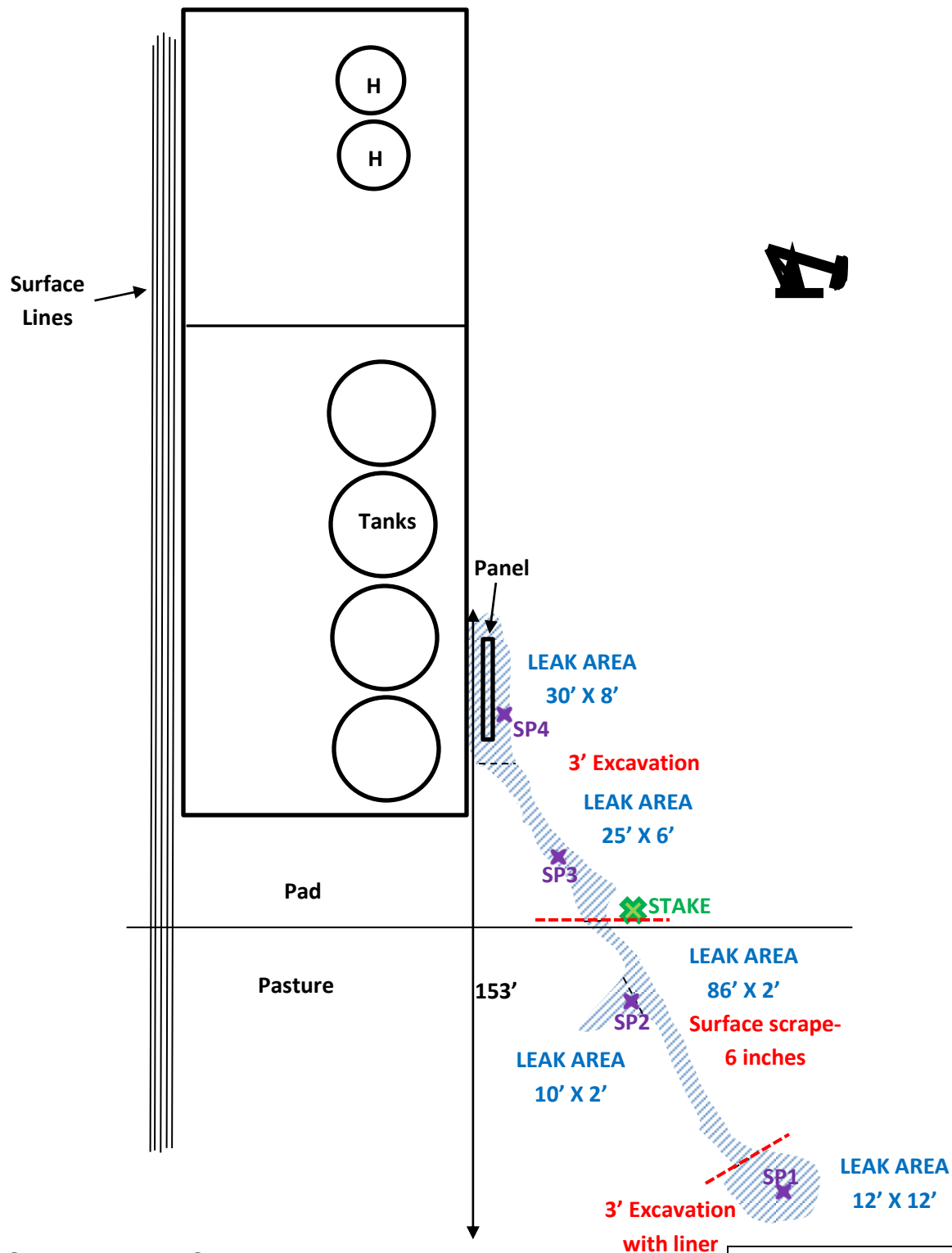
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|                                      |                     |  |                                   |
|--------------------------------------|---------------------|--|-----------------------------------|
| Signature: <i>A. Trujillo</i>        |                     | <b>OIL CONSERVATION DIVISION</b>                         |                                   |
| Printed Name: Amanda Trujillo        |                     | Approved by Environmental Specialist: <i>Janet Hoyer</i> |                                   |
| Title: Environmental Coordinator     |                     | Approval Date: 01/19/2016                                | Expiration Date: ///              |
| E-mail Address: atrujillo@concho.com |                     | Conditions of Approval: ///                              | Attached <input type="checkbox"/> |
| Date: 1/11/16                        | Phone: 575-748-6940 |  |                                   |

\* Attach Additional Sheets If Necessary

# Concho

## GC Federal #11 Tank Battery



U/L I, Section 19, T17S, R32E

Lea County, NM

N 32.81675° W 103.79939°

API# 30-025-38994

**BBC International, Inc.**

**Concho**  
**CG Federal #11 Tank Battery**

Date: 11/6/15

DRWG by: J.Gilkey

NOT TO SCALE

File: Concho 2015

# Groundwater Plot

## Concho GC Federal #11 Tank Battery

County  
Eddy

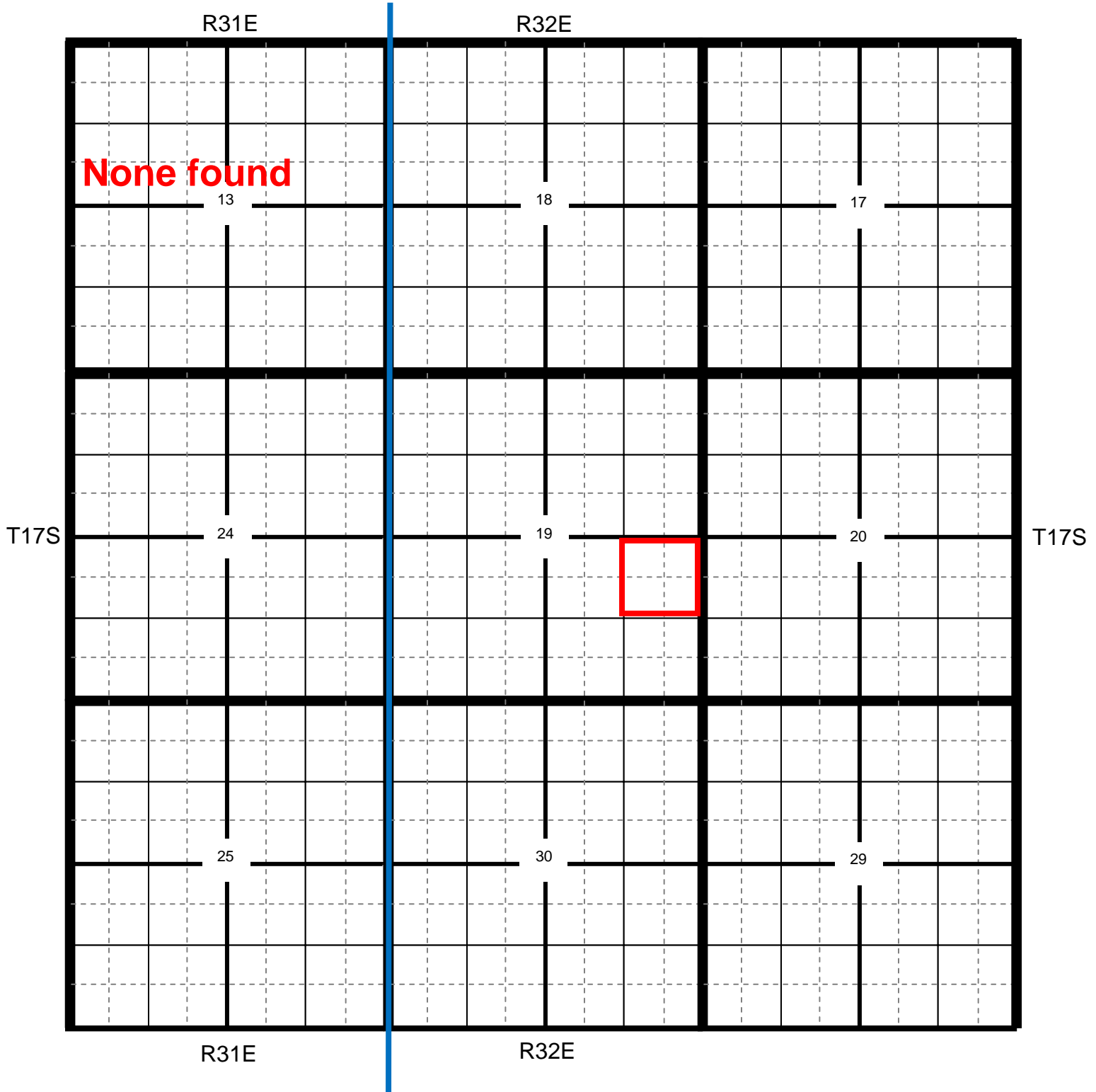
Unit Letter  
I

Section  
19

Township  
17S

Range  
32E

Trend Map 200'



Location

OCD

USGS

SEO

All Databases

## Concho GC Federal #11 Tank Battery

|               |                    |                |                 |              |
|---------------|--------------------|----------------|-----------------|--------------|
| <b>County</b> | <b>Unit Letter</b> | <b>Section</b> | <b>Township</b> | <b>Range</b> |
| Lea           | I                  | 19             | 17S             | 32E          |

Trend Map 200'

1

2

|                            |               |               |               |
|----------------------------|---------------|---------------|---------------|
| NW/NW<br><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         | SW/SE         | SE/SE         |
| Unit Letter M              | Unit Letter N | Unit Letter O | Unit Letter P |

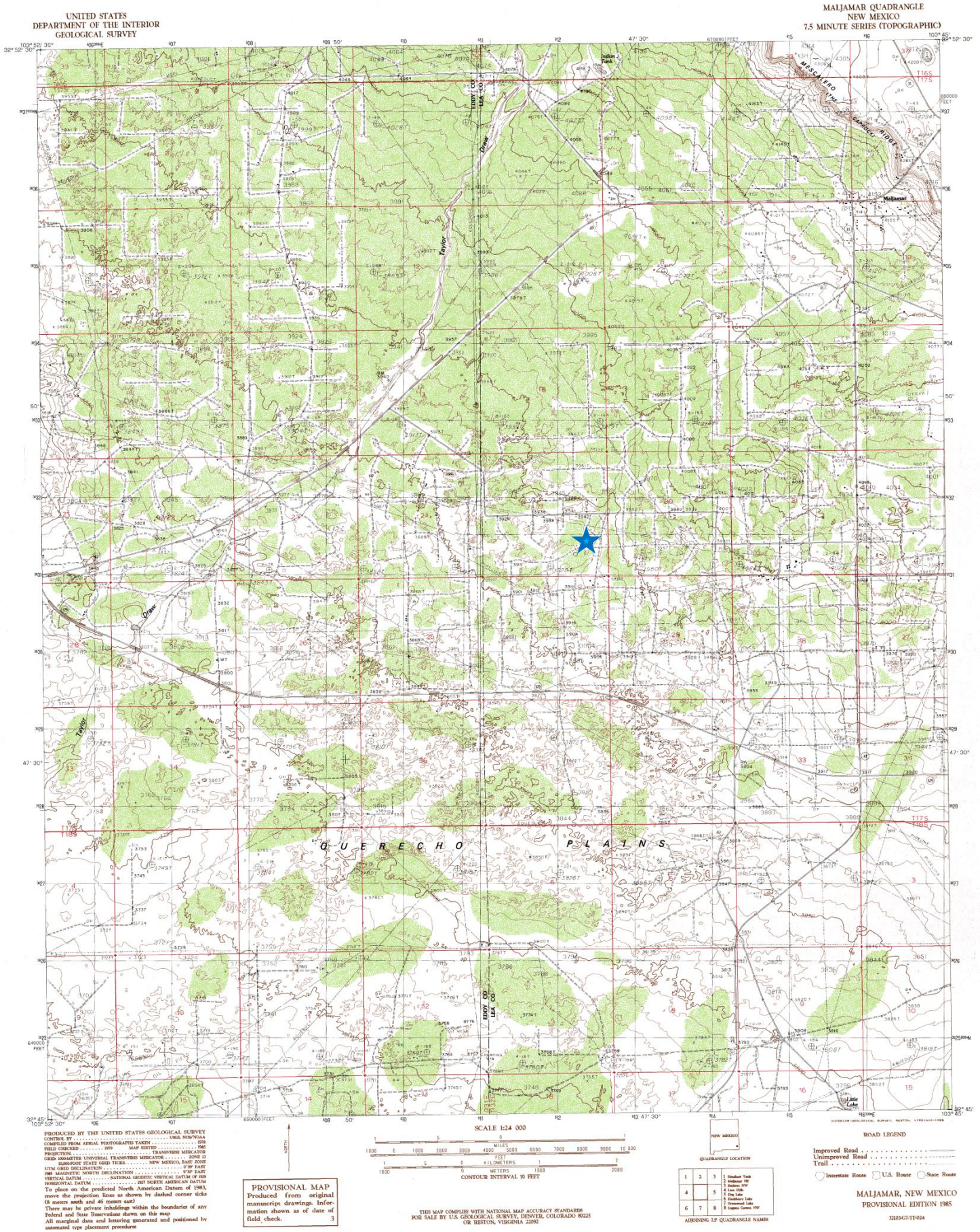
3

4



# Concho

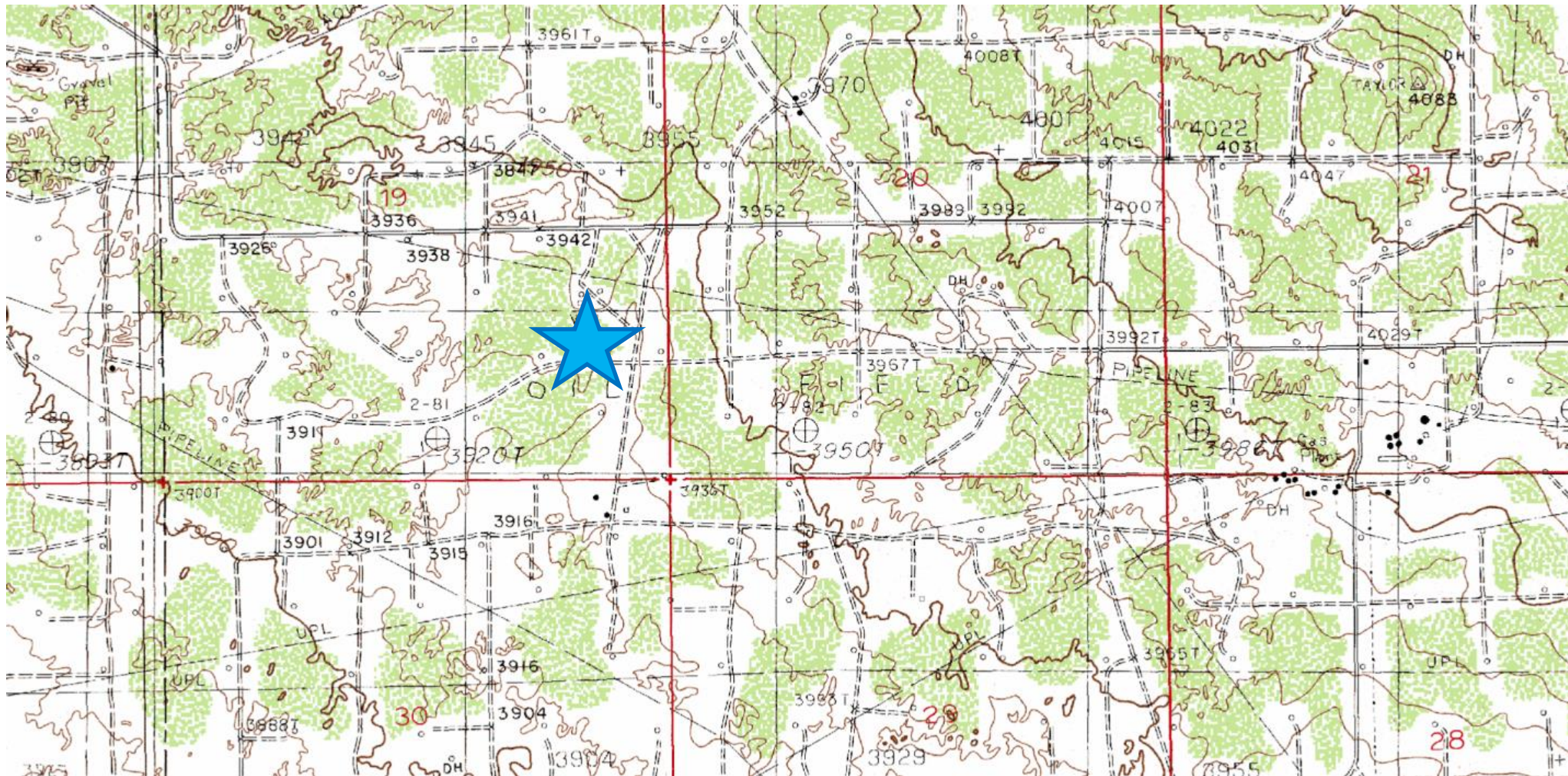
## GC Federal #11 Tank Battery





# Concho

## GC Federal #11 Tank Battery





**Laboratory Analytical Results Summary  
GC Federal #11 Tank Battery**

|          |            | Sample | SP1 @ 1' | SP1 @ 3' | SP1 @ 5' | SP1 @ 7' | SP1 @ 9' | SP1 @ 10' |
|----------|------------|--------|----------|----------|----------|----------|----------|-----------|
| Analyte  | Method     | Date   | 11/13/15 | 11/13/15 | 11/13/15 | 11/13/15 | 11/13/15 | 11/13/15  |
|          |            |        | mg/Kg    | mg/Kg    | mg/Kg    | mg/Kg    | mg/Kg    | mg/Kg     |
| Chloride | SM4500Cl-B |        | 112      | 5600     | 4480     | 5040     | 2320     | <16.0     |

|          |            | Sample | SP2 @ 1' | SP2 @ 2' | SP2 @ 3' |
|----------|------------|--------|----------|----------|----------|
| Analyte  | Method     | Date   | 11/13/15 | 11/13/15 | 11/13/15 |
|          |            |        | mg/Kg    | mg/Kg    | mg/Kg    |
| Chloride | SM4500Cl-B |        | 464      | 528      | 32       |

|          |            | Sample | SP3 @ 1' | SP3 @ 2' | SP3 @ 3' | SP3 @ 3' |
|----------|------------|--------|----------|----------|----------|----------|
| Analyte  | Method     | Date   | 11/16/15 | 11/16/15 | 11/16/15 | 11/16/15 |
|          |            |        | mg/Kg    | mg/Kg    | mg/Kg    | mg/Kg    |
| Chloride | SM4500Cl-B |        | 3160     | 4160     | 4000     | 96       |

|          |            | Sample | SP4 @ 1' | SP4 @ 2' | SP4 @ 3' | SP4 @ 4' | SP4 @ 5' |
|----------|------------|--------|----------|----------|----------|----------|----------|
| Analyte  | Method     | Date   | 11/16/15 | 11/16/15 | 11/16/15 | 11/16/15 | 11/16/15 |
|          |            |        | mg/Kg    | mg/Kg    | mg/Kg    | mg/Kg    | mg/Kg    |
| Chloride | SM4500Cl-B |        | 2560     | 4000     | 2440     | 512      | 32       |



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

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November 20, 2015

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: G C FEDERAL #11 TB

Enclosed are the results of analyses for samples received by the laboratory on 11/18/15 8:16.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

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

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

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager

**Analytical Results For:**

BBC International, Inc.  
Cliff Brunson  
P.O. Box 805  
Hobbs NM, 88241  
Fax To: (575) 397-0397

Received: 11/18/2015  
Reported: 11/20/2015  
Project Name: G C FEDERAL #11 TB  
Project Number: NONE GIVEN  
Project Location: MALJAMAR, NM

Sampling Date: 11/13/2015  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: SP 1 @ 1' (H503039-01)**

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 112    | 16.0            | 11/19/2015 | ND              | 384 | 96.0       | 400           | 11.8 |           |  |

**Sample ID: SP 1 @ 3' (H503039-02)**

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 5600   | 16.0            | 11/19/2015 | ND              | 384 | 96.0       | 400           | 11.8 |           |  |

**Sample ID: SP 1 @ 5' (H503039-03)**

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 4480   | 16.0            | 11/19/2015 | ND              | 384 | 96.0       | 400           | 11.8 |           |  |

**Sample ID: SP 1 @ 7' (H503039-04)**

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 5040   | 16.0            | 11/19/2015 | ND              | 384 | 96.0       | 400           | 11.8 |           |  |

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:         | 11/18/2015         | Sampling Date:      | 11/13/2015    |
| Reported:         | 11/20/2015         | Sampling Type:      | Soil          |
| Project Name:     | G C FEDERAL #11 TB | Sampling Condition: | Cool & Intact |
| Project Number:   | NONE GIVEN         | Sample Received By: | Jodi Henson   |
| Project Location: | MALJAMAR, NM       |                     |               |

**Sample ID: SP 1 @ 9' (H503039-05)**

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 2320   | 16.0            | 11/19/2015 | ND              | 384 | 96.0       | 400           | 11.8 |           |  |

**Sample ID: SP 1 @ 10' (H503039-06)**

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | <16.0  | 16.0            | 11/19/2015 | ND              | 384 | 96.0       | 400           | 11.8 |           |  |

**Sample ID: SP 2 @ 1' (H503039-07)**

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| Chloride             | 464    | 16.0            | 11/19/2015 | ND              | 384 | 96.0       | 400           | 11.8 |           |

**Sample ID: SP 2 @ 2' (H503039-08)**

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 528    | 16.0            | 11/20/2015 | ND              | 416 | 104        | 400           | 3.77 |           |  |

**Sample ID: SP 2 @ 3' (H503039-09)**

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 32.0   | 16.0            | 11/20/2015 | ND              | 416 | 104        | 400           | 3.77 |           |  |

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:         | 11/18/2015         | Sampling Date:      | 11/16/2015    |
| Reported:         | 11/20/2015         | Sampling Type:      | Soil          |
| Project Name:     | G C FEDERAL #11 TB | Sampling Condition: | Cool & Intact |
| Project Number:   | NONE GIVEN         | Sample Received By: | Jodi Henson   |
| Project Location: | MALJAMAR, NM       |                     |               |

**Sample ID: SP 3 @ 1' (H503039-10)**

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 3160   | 16.0            | 11/20/2015 | ND              | 416 | 104        | 400           | 3.77 |           |  |

**Sample ID: SP 3 @ 2' (H503039-11)**

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| Chloride             | 4160   | 16.0            | 11/20/2015 | ND              | 416 | 104        | 400           | 3.77 |           |

**Sample ID: SP 3 @ 3' (H503039-12)**

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 4000   | 16.0            | 11/20/2015 | ND              | 416 | 104        | 400           | 3.77 |           |  |

**Sample ID: SP 3 @ 4' (H503039-13)**

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 96.0   | 16.0            | 11/20/2015 | ND              | 416 | 104        | 400           | 3.77 |           |  |

**Sample ID: SP 4 @ 1' (H503039-14)**

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 2560   | 16.0            | 11/20/2015 | ND              | 416 | 104        | 400           | 3.77 |           |  |

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: 11/18/2015  
Reported: 11/20/2015  
Project Name: G C FEDERAL #11 TB  
Project Number: NONE GIVEN  
Project Location: MALJAMAR, NM

Sampling Date: 11/16/2015  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: SP 4 @ 2' (H503039-15)**

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| Chloride             | 4000   | 16.0            | 11/20/2015 | ND              | 416 | 104        | 400           | 3.77 |           |

**Sample ID: SP 4 @ 3' (H503039-16)**

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| Chloride             | 2440   | 16.0            | 11/20/2015 | ND              | 416 | 104        | 400           | 3.77 |           |

**Sample ID: SP 4 @ 4' (H503039-17)**

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| Chloride             | 512    | 16.0            | 11/20/2015 | ND              | 416 | 104        | 400           | 3.77 |           |

**Sample ID: SP 4 @ 5' (H503039-18)**

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AP |     |            |               |      |           |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| Chloride             | 32.0   | 16.0            | 11/20/2015 | ND              | 416 | 104        | 400           | 3.77 |           |

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



**Notes and Definitions**

|     |  |
|-----|--|
| ND  | Analyte NOT DETECTED at or above the reporting limit   |
| RPD | Relative Percent Difference  |
| **  | Samples not received at proper temperature of 6°C or below.  |
| *** | Insufficient time to reach temperature.  |
| -   | Chloride by SM4500Cl-B does not require samples be received at or below 6°C<br>Samples reported on an as received basis (wet) unless otherwise noted on report |

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Celey D. Keene, Lab Director/Quality Manager



# CARDINAL LABORATORIES

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

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

|   |             |                   |              |                  |            |                          |     |                |         |            |            |                  |       |                         |   |  |  |  |  |  |  |  |  |  |  |  |  |
|---|-------------|-------------------|--------------|------------------|------------|--------------------------|-----|----------------|---------|------------|------------|------------------|-------|-------------------------|---|--|--|--|--|--|--|--|--|--|--|--|--|
| Company Name: BCB International, Inc.   |             | <b>BILL TO</b>    |              | ANALYSIS REQUEST |            |                          |     |                |         |            |            |                  |       |                         |   |  |  |  |  |  |  |  |  |  |  |  |  |
| Project Manager: Cliff Brunson  |             | P.O. #:           |              |                  |            |                          |     |                |         |            |            |                  |       |                         |   |  |  |  |  |  |  |  |  |  |  |  |  |
| Address: P.O. Box 805   |             | Company:          |              |                  |            |                          |     |                |         |            |            |                  |       |                         |   |  |  |  |  |  |  |  |  |  |  |  |  |
| City: Hobbs   |             | Attn:             |              |                  |            |                          |     |                |         |            |            |                  |       |                         |   |  |  |  |  |  |  |  |  |  |  |  |  |
| Phone #: 575-397-6388   |             | Address:          |              |                  |            |                          |     |                |         |            |            |                  |       |                         |   |  |  |  |  |  |  |  |  |  |  |  |  |
| Fax #: 575-397-0397   |             | City:             |              |                  |            |                          |     |                |         |            |            |                  |       |                         |   |  |  |  |  |  |  |  |  |  |  |  |  |
| Project #:  |             | State:            |              |                  |            |                          |     |                |         |            |            |                  |       |                         |   |  |  |  |  |  |  |  |  |  |  |  |  |
| Project Name: LC Federal #117B  |             | Zip:              |              |                  |            |                          |     |                |         |            |            |                  |       |                         |   |  |  |  |  |  |  |  |  |  |  |  |  |
| Project Location: McJannet  |             | Phone #:          |              |                  |            |                          |     |                |         |            |            |                  |       |                         |   |  |  |  |  |  |  |  |  |  |  |  |  |
| Sampler Name:   |             | Fax #:            |              |                  |            |                          |     |                |         |            |            |                  |       |                         |   |  |  |  |  |  |  |  |  |  |  |  |  |
| FOR LAB USE ONLY  |             | PRESERV           |              | SAMPLING         |            |                          |     |                |         |            |            |                  |       |                         |   |  |  |  |  |  |  |  |  |  |  |  |  |
| Lab I.D.  | Sample I.D. | (G)RAB OR (C)OMP. | # CONTAINERS | GROUNDWATER      | WASTEWATER | SOIL                     | OIL | SLUDGE         | OTHER : | ACID/BASE: | ICE / COOL | OTHER :          | DATE  | TIME                    |   |  |  |  |  |  |  |  |  |  |  |  |  |
| 1503039   | SP101       |                   | 1            |                  |            | X                        |     |                |         |            |            |                  | 11-13 | 925                     | X |  |  |  |  |  |  |  |  |  |  |  |  |
| 2   | SP103       |                   | 1            |                  |            | X                        |     |                |         |            |            |                  | 10-10 | 101                     | X |  |  |  |  |  |  |  |  |  |  |  |  |
| 3   | SP105       |                   | 1            |                  |            | X                        |     |                |         |            |            |                  | 12-08 | 159                     | X |  |  |  |  |  |  |  |  |  |  |  |  |
| 4   | SP107       |                   | 1            |                  |            | X                        |     |                |         |            |            |                  | 3-10  | 222                     | X |  |  |  |  |  |  |  |  |  |  |  |  |
| 5   | SP109       |                   | 1            |                  |            | X                        |     |                |         |            |            |                  | 3-30  | 339                     | X |  |  |  |  |  |  |  |  |  |  |  |  |
| 6   | SP201       |                   | 1            |                  |            | X                        |     |                |         |            |            |                  | 11-16 | 911                     | X |  |  |  |  |  |  |  |  |  |  |  |  |
| 7   | SP203       |                   | 1            |                  |            | X                        |     |                |         |            |            |                  |       |                         |   |  |  |  |  |  |  |  |  |  |  |  |  |
| 8   | SP201       |                   | 1            |                  |            | X                        |     |                |         |            |            |                  |       |                         |   |  |  |  |  |  |  |  |  |  |  |  |  |
| 9   | SP203       |                   | 1            |                  |            | X                        |     |                |         |            |            |                  |       |                         |   |  |  |  |  |  |  |  |  |  |  |  |  |
| 10  | SP201       |                   | 1            |                  |            | X                        |     |                |         |            |            |                  |       |                         |   |  |  |  |  |  |  |  |  |  |  |  |  |
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| Relinquished By: [Signature]  |             | Date: 11-18-15    |              | Time: 8:10AM     |            | Received By: [Signature] |     | Date: 11-18-15 |         | Time: 2:40 |            | Sample Condition |       | Checked By: [Signature] |   |  |  |  |  |  |  |  |  |  |  |  |  |
| Relinquished By: [Signature]  |             | Date: 11-18-15    |              | Time: 8:10AM     |            | Received By: [Signature] |     | Date: 11-18-15 |         | Time: 2:40 |            | Sample Condition |       | Checked By: [Signature] |   |  |  |  |  |  |  |  |  |  |  |  |  |
| Delivered By: (Circle One)  |             | Cool              |              | Intact           |            | Yes                      |     | No             |         | Yes        |            | No               |       | Checked By: [Signature] |   |  |  |  |  |  |  |  |  |  |  |  |  |
| Sampler - UPS - Bus - Other:  |             | Cool              |              | Intact           |            | Yes                      |     | No             |         | Yes        |            | No               |       | Checked By: [Signature] |   |  |  |  |  |  |  |  |  |  |  |  |  |

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

#54



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

### CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page 8 of 8



## Kathy Purvis

---

**From:** Jones, Kellie, EMNRD <Kellie.Jones@state.nm.us>  
**Sent:** Tuesday, December 15, 2015 7:57 AM  
**To:** Cliff Brunson; Glass, Dara  
**Cc:** Ken Swinney; Jennifer Gilkey; Kathy Purvis; Keyes, Jamie, EMNRD  
**Subject:** RE: COG (Concho) GC Federal #11 Tank Battery - Remediation Plan

Cliff,

The work plan is approved with the condition of ensuring approval from BLM.

If you have any questions, please feel free to contact me.

Have a great day!!!

Kellie Jones  
Environmental Specialist, District 1  
Oil Conservation Division, EMNRD  
575-393-6161 ext. 111  
575-370-3180 (emergency-cell)  
E-Mail: [kellie.jones@state.nm.us](mailto:kellie.jones@state.nm.us)

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:** Monday, December 14, 2015 6:39 PM  
**To:** Jones, Kellie, EMNRD  
**Cc:** Ken Swinney; Jennifer Gilkey; Kathy Purvis; Keyes, Jamie, EMNRD  
**Subject:** COG (Concho) GC Federal #11 Tank Battery - Remediation Plan

Kellie,

I have attached the remediation plan that we discussed at your office last week and you verbally approved. I have received the same approval from the BLM in writing. If you would please email me back with your approval, 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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Version: 2015.0.6176 / Virus Database: 4483/11182 - Release Date: 12/15/15

## Kathy Purvis

---

**From:** Cliff Brunson <cbrunson@bbcinternational.com>  
**Sent:** Thursday, December 10, 2015 2:50 PM  
**To:** Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** FW: Concho GC Federal #11 Tank Battery - Remediation Plan

FYI...see BLM approval below.

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:** Glass, Dara [<mailto:djglass@blm.gov>]  
**Sent:** Thursday, December 10, 2015 2:00 PM  
**To:** Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)>; Oberding, Tomas, EMNRD <[tomas.oberding@state.nm.us](mailto:tomas.oberding@state.nm.us)>  
**Subject:** Re: Concho GC Federal #11 Tank Battery - Remediation Plan

Cliff,

BLM approves the proposed plan and agrees with OCD on sampling the surrounding area off pad to ensure the appropriate remediation is completed.

Thank you.

Dara

*Dara Glass*  
[djglass@blm.gov](mailto:djglass@blm.gov)  
Environmental Protection Specialist



**The BLM approval/acceptance 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 Tue, Dec 8, 2015 at 3:41 PM, Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)> wrote:

Dara,

Attached are the materials that we will discuss Wednesday morning.

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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