

# Closure Report

**APPROVED**

## Site Description

Site Name:	Covington A Federal #9 CTB
Company:	Oxy Permian Ltd.
Legal Description:	U/L N, Section 25, T22S, R32E
County:	Lea County, NM
GPS Coordinates:	N 32.35671° W 103.63024°

## Release Data

Date of Release:	07/22/2015
Type of Release:	Oil and Produced water
Source of Release:	Line Corrosion
Volume of Release:	3 bbls oil, 10 bbls produced water
Volume Recovered:	10 bbls

## Remediation Specifications

Remediation Parameters:	Excavate the entire leak site to a depth of 6 inches. Backfill the site clean soil.
Remediation Activities:	October 2015

Plan Sent to OCD:	08/17/2015	Email from Cliff Brunson to Jamie Keyes
OCD Approval of Plan:	08/18/2015	Email from Jamie Keyes to Cliff Brunson
Plan Sent to BLM:	08/17/2015	Email from Cliff Brunson to Shelly Tucker
BLM Approval of Plan:	08/19/2015	Email from Shelly Tucker to Cliff Brunson

## Supporting Documentation

Initial C-141	08/13/2015
Final C-141	Signed 08/31/2016
Site Diagram	July 2015
Groundwater Plot	450'
TOPO Maps	July 2015
Lab Summary	07/31/2015
Lab Analysis	07/31/2015
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.

08/31/2016

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

State of New Mexico  
Energy Minerals and Natural Resources

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

Form C-141  
Revised August 8, 2011

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

### Release Notification and Corrective Action

#### OPERATOR

☒ Initial Report ☐ Final Report

Name of Company	Oxy Permian Ltd.	Contact	Chancey Summers
Address	6 Desta Drive, Midland, TX 79705	Telephone No.	(432) 685-5824
Facility Name	Covington A Federal #9 CTB	Facility Type	Battery
Surface Owner	BLM	Mineral Owner	
		API No.	30-25-32036

#### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
SW ¼	25	22S	32E					Lea County, NM

Latitude N 32.35671° Longitude W 103.63024°

#### NATURE OF RELEASE

Type of Release	Oil and Produced water	Volume of Release	3 bbls oil, 10 bbls produced water	Volume Recovered	10 bbls
Source of Release	Corrosion of 2" steel production line	Date and Hour of Occurrence	7/22/2015	Date and Hour of Discovery	
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Kellie Jones, Jamie Keyes, & Tomas Oberding-NMOCD; Shelly Tucker & James Amos-BLM		
By Whom?	Kathy Purvis @ BBC International Inc.	Date and Hour	07/22/2015 @ 4:30 pm		
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.			

If a Watercourse was Impacted, Describe Fully.\*

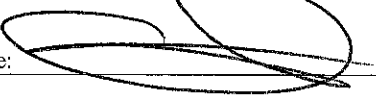
Describe Cause of Problem and Remedial Action Taken.\*

Corrosion of a 2" steel production line caused 3 bbls of oil and 10 bbls of produced water to leak onto the ground. A vacuum truck recovered 10 bbls of fluids and the line was repaired or replaced.

Describe Area Affected and Cleanup Action Taken.\*

The affected area is approximately 85' x 25' inside the containment on location. Remediation will be completed in accordance with a remediation plan approved by NMOCD and the BLM.

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

Signature: 		<u>OIL CONSERVATION DIVISION</u>	
Printed Name: Chancey Summers		Approved by Environmental Specialist:	
Title: HES Lead		Approval Date:	Expiration Date:
E-mail Address: <u>Chancey_Summers@oxy.com</u>		Conditions of Approval:	
Date: <u>7-13-15</u>	Phone: (432) 685-5824	Attached <input type="checkbox"/>	

\* Attach Additional Sheets If Necessary

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

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

### Release Notification and Corrective Action

OPERATOR		<input type="checkbox"/> Initial Report	<input checked="" type="checkbox"/> Final Report
Name of Company	Oxy Permian Ltd.	Contact	Casey Summers
Address	6 Desta Drive, Midland, TX 79705	Telephone No.	(575) 513-8289
Facility Name	Covington A Federal #9 CTB	Facility Type	Battery
Surface Owner	BLM	Mineral Owner	API No. 30-25-32036

### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
SW ¼	25	22S	32E					Lea County, NM

Latitude N 32.35671° Longitude W 103.63024°

### NATURE OF RELEASE

Type of Release	Oil and Produced water	Volume of Release	3 bbls oil, 10 bbls produced water	Volume Recovered	10 bbls
Source of Release	Corrosion of 2" steel production line	Date and Hour of Occurrence	7/22/2015	Date and Hour of Discovery	
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Kellie Jones, Jamie Keyes, & Tomas Oberding-NMOCD; Shelly Tucker & James Amos-BLM		
By Whom?	Kathy Purvis @ BBC International Inc.	Date and Hour	07/22/2015 @ 4:30 pm		
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.			

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

Corrosion of a 2" steel production line caused 3 bbls of oil and 10 bbls of produced water to leak onto the ground. A vacuum truck recovered 10 bbls of fluids and the line was repaired or replaced.

Describe Area Affected and Cleanup Action Taken.\*

The affected area is approximately 85' x 25' inside the containment on location. Remediation was completed in accordance with the remediation plan approved by Jamie Keyes of NMOCD via email on 08/18/2015 and approved by Shelly Tucker of the BLM via email on 08/19/2015.

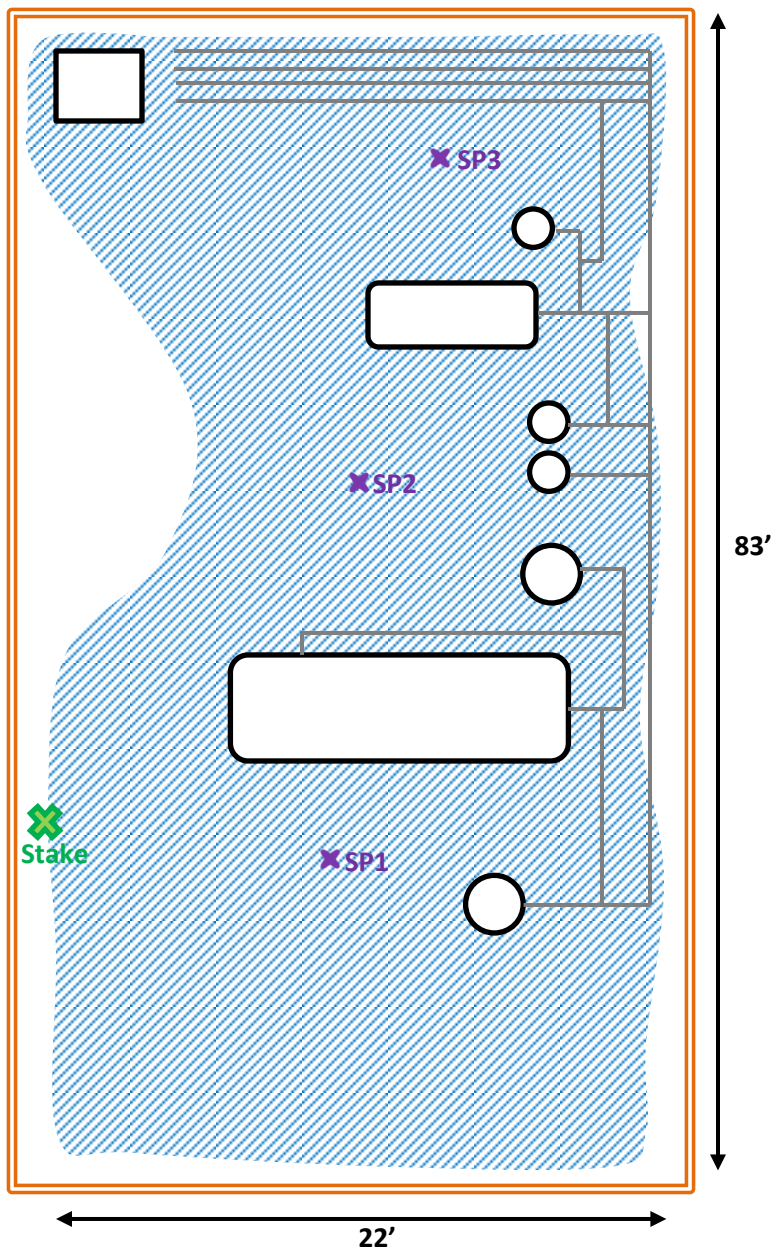
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger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

OIL CONSERVATION DIVISION	
Signature:	Approved by Environmental Specialist: <i>Kateorynch</i>
Printed Name: Casey Summers	Approval Date: <u>9/1/2016</u> Expiration Date: <u>N/A</u>
Title: NM Environmental Advisor	Conditions of Approval: <u>N/A</u> Attached <input type="checkbox"/>
E-mail Address: <u>Casey_Summers@oxy.com</u>	
Date: <u>8-31-16</u> Phone: (575) 513-8289	

\* Attach Additional Sheets If Necessary



Oxy  
Covington A Federal #9 CTB



SW ¼, Section 25, T22S, R32E

Lea County, NM

N 32.35671° W 103.63024°

API# 30-025-32036

**BBC International, Inc.**

**Oxy**  
**Covington A Federal #9 CTB**

Date: 07/30/2015

DRWG by: K. Purvis

NOT TO SCALE

File: Oxy 2015

# Groundwater Plot

## Oxy Covington A Federal #9 CTB

County  
Lea

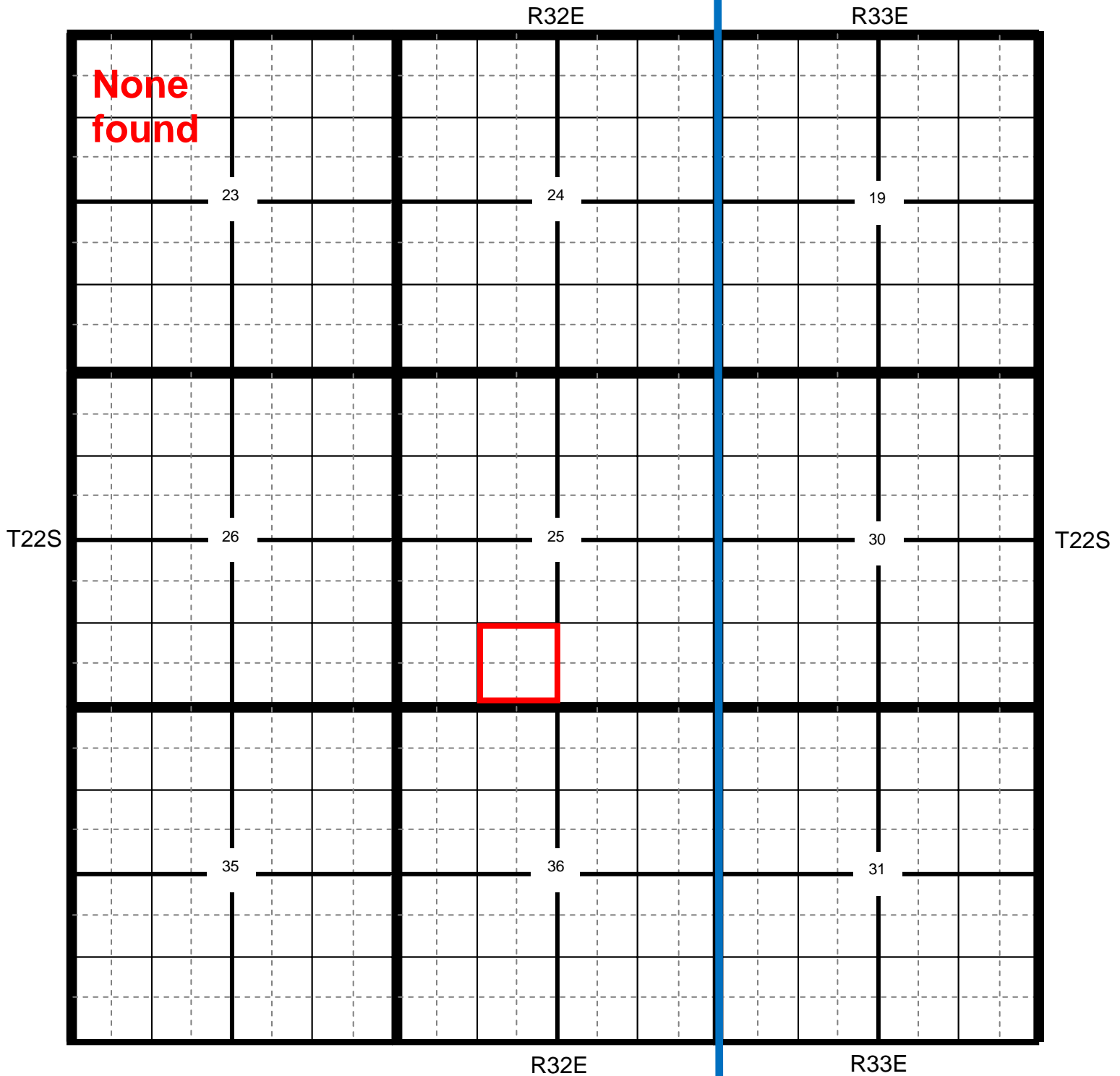
Unit Letter  
N

Section  
25

Township  
22S

Range  
32E

Trend Map 450'



Location

OCD

USGS

SEO

All Databases

## Oxy Covington A Federal #9 CTB

<b>County</b>	<b>Unit Letter</b>	<b>Section</b>	<b>Township</b>	<b>Range</b>
Lea	N	25	22S	32E

Trend Map 450'

1

2

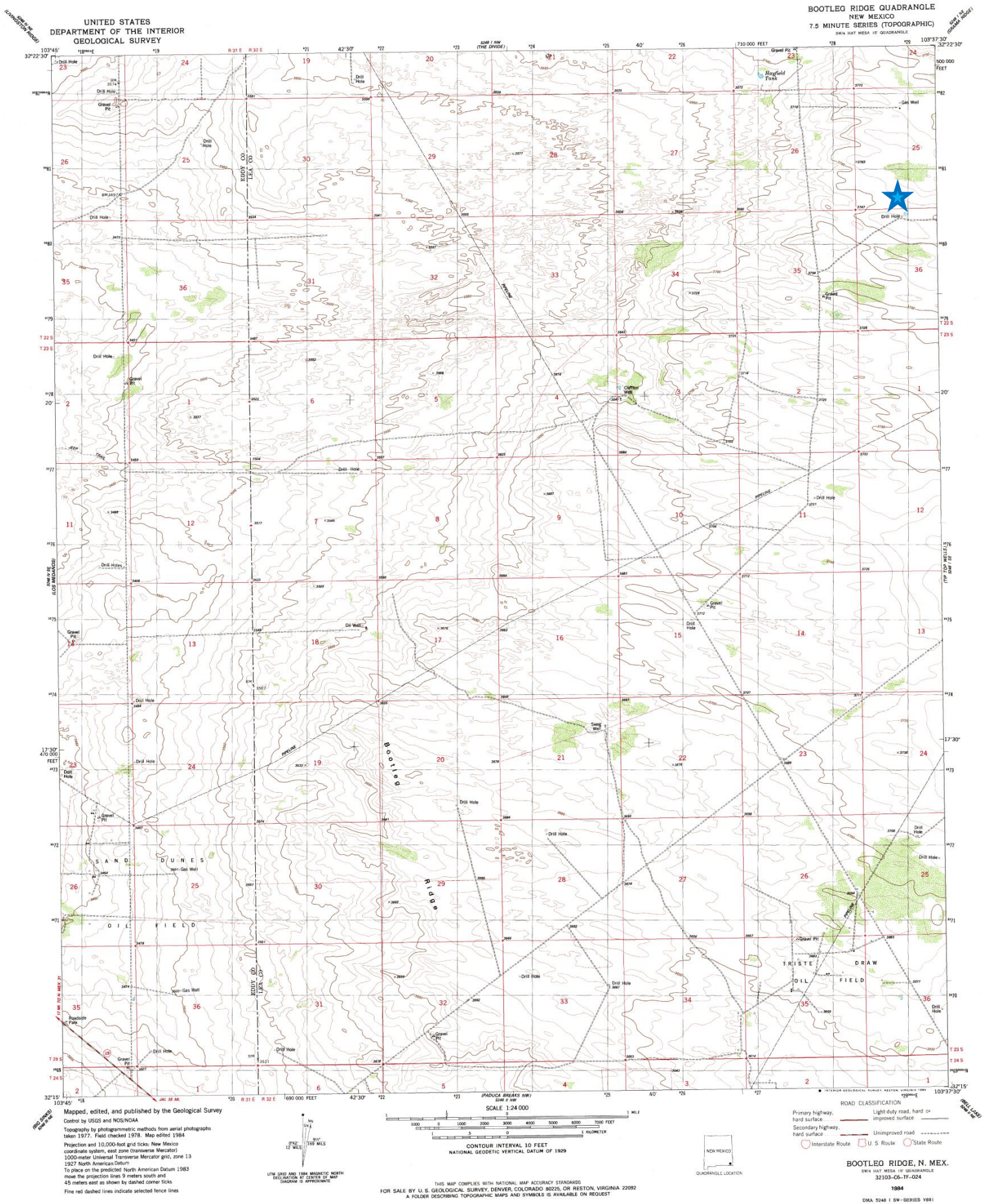
NW/NW <b>None found</b>	NE/NW	NW/NE	NE/NE
Unit Letter D	Unit Letter C	Unit Letter B	Unit Letter A
SW/NW	SE/NW	SW/NE	SE/NE
Unit Letter E	Unit Letter F	Unit Letter G	Unit Letter H
NW/SW	NE/SW	NW/SE	NE/SE
Unit Letter L	Unit Letter K	Unit Letter J	Unit Letter I
SW/SW	SE/SW	SW/SE	SE/SE
Unit Letter M	Unit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

3

4

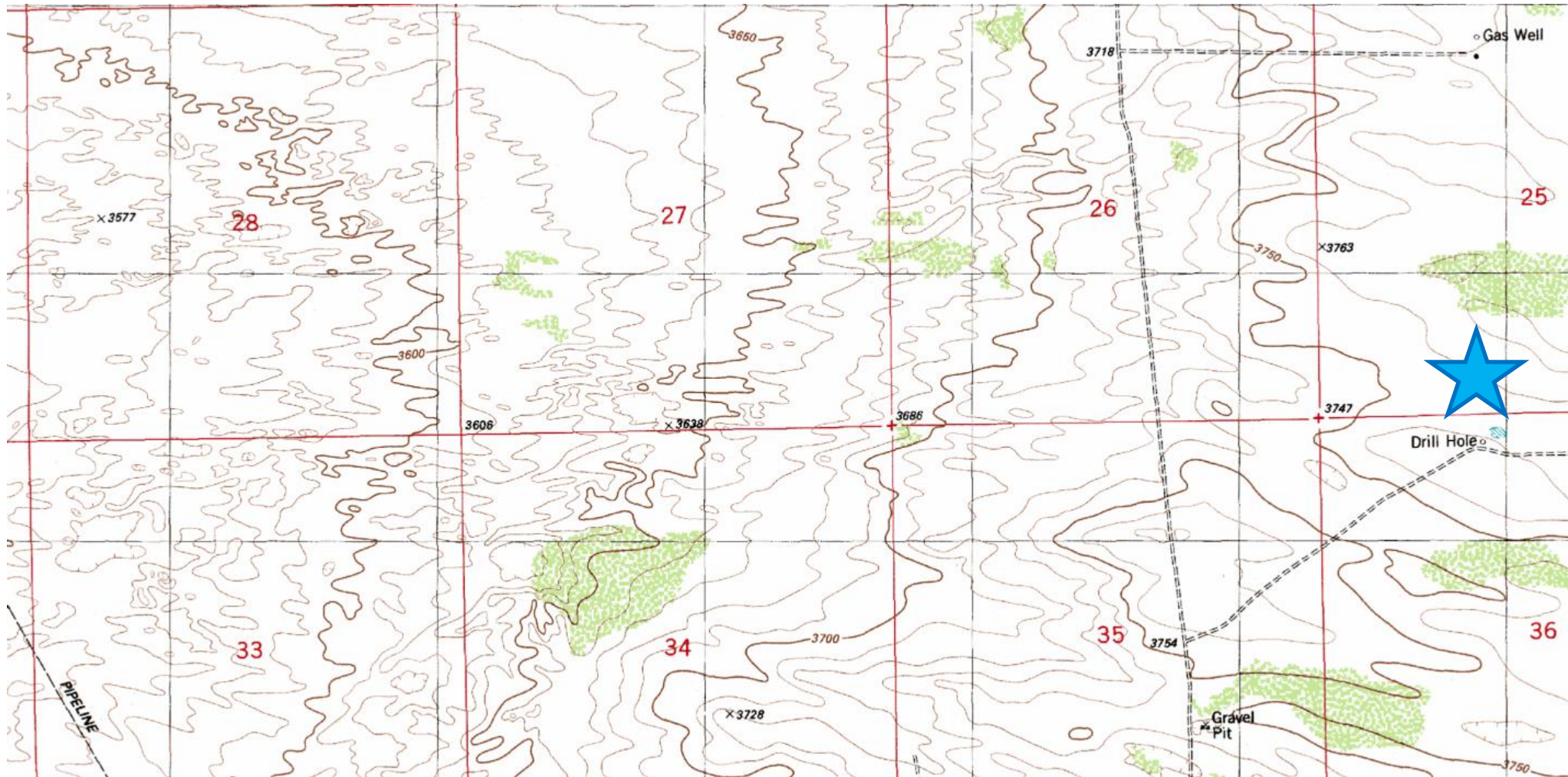
# Oxy

## Covington A Federal #9 CTB



# Oxy

## Covington A Federal #9 CTB



**Laboratory Analytical Results Summary  
Covington A Federal #9 CTB**

		Sample	SP1 @ 1'	SP1 @ 2'	SP1 @ 3'
Analyte	Method	Date	7/31/15	7/31/15	7/31/15
			mg/Kg	mg/Kg	mg/Kg
<b>Benzene</b>	BTEX 8021B		<0.050	<0.050	<0.050
<b>Toluene</b>	BTEX 8021B		<0.050	<0.050	<0.050
<b>Ethylbenzene</b>	BTEX 8021B		<0.050	<0.050	<0.050
<b>Total Xylenes</b>	BTEX 8021B		<0.150	<0.150	<0.150
<b>Total BTEX</b>	BTEX 8021B		<0.300	<0.300	<0.300
<b>Chloride</b>	SM4500Cl-B		<b>432</b>	<b>96</b>	<b>112</b>
<b>GRO</b>	TPH 8015M		<10.0	<10.0	<10.0
<b>DRO</b>	TPH 8015M		<10.0	<10.0	<10.0

		Sample	SP2 @ 1'	SP2 @ 2'	SP2 @ 3'
Analyte	Method	Date	7/31/15	7/31/15	7/31/15
			mg/Kg	mg/Kg	mg/Kg
<b>Benzene</b>	BTEX 8021B		<0.050	<0.050	<0.050
<b>Toluene</b>	BTEX 8021B		<0.050	<0.050	<0.050
<b>Ethylbenzene</b>	BTEX 8021B		<0.050	<0.050	<0.050
<b>Total Xylenes</b>	BTEX 8021B		<0.150	<0.150	<0.150
<b>Total BTEX</b>	BTEX 8021B		<0.300	<0.300	<0.300
<b>Chloride</b>	SM4500Cl-B		<b>432</b>	<b>288</b>	<b>112</b>
<b>GRO</b>	TPH 8015M		<10.0	<10.0	<10.0
<b>DRO</b>	TPH 8015M		<10.0	<10.0	<10.0

		Sample	SP3 @ 1'	SP3 @ 2'	SP3 @ 3'
Analyte	Method	Date	7/31/15	7/31/15	7/31/15
			mg/Kg	mg/Kg	mg/Kg
<b>Benzene</b>	BTEX 8021B		<0.050	<0.050	<0.050
<b>Toluene</b>	BTEX 8021B		<0.050	<0.050	<0.050
<b>Ethylbenzene</b>	BTEX 8021B		<0.050	<0.050	<0.050
<b>Total Xylenes</b>	BTEX 8021B		<0.150	<0.150	<0.150
<b>Total BTEX</b>	BTEX 8021B		<0.300	<0.300	<0.300
<b>Chloride</b>	SM4500Cl-B		<b>400</b>	<b>80</b>	<b>112</b>
<b>GRO</b>	TPH 8015M		<10.0	<10.0	<10.0
<b>DRO</b>	TPH 8015M		<10.0	<10.0	<10.0



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

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August 11, 2015

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: COVINGTON A FED #9 CTB

Enclosed are the results of analyses for samples received by the laboratory on 08/03/15 16:55.

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

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

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

Celey D. Keene

Lab Director/Quality Manager

**Analytical Results For:**

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

Received:	08/03/2015	Sampling Date:	07/31/2015
Reported:	08/11/2015	Sampling Type:	Soil
Project Name:	COVINGTON A FED #9 CTB	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: SP1 @ 1' (H502008-01)**

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/05/2015	ND	1.75	87.4	2.00	2.36	
Toluene*	<0.050	0.050	08/05/2015	ND	1.71	85.7	2.00	2.07	
Ethylbenzene*	<0.050	0.050	08/05/2015	ND	1.79	89.5	2.00	4.00	
Total Xylenes*	<0.150	0.150	08/05/2015	ND	4.68	77.9	6.00	3.50	
Total BTX	<0.300	0.300	08/05/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 121 % 85.6-137

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	432	16.0	08/10/2015	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/04/2015	ND	197	98.7	200	0.790	
DRO >C10-C28	<10.0	10.0	08/04/2015	ND	178	88.9	200	4.52	

Surrogate: 1-Chlorooctane 103 % 47.2-157

Surrogate: 1-Chlorooctadecane 130 % 52.1-176

Cardinal Laboratories

\*=Accredited Analyte

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



Celey D. Keene, Lab Director/Quality Manager

**Analytical Results For:**

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

Received:	08/03/2015	Sampling Date:	07/31/2015
Reported:	08/11/2015	Sampling Type:	Soil
Project Name:	COVINGTON A FED #9 CTB	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: SP1 @ 2' (H502008-02)**

BTX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/05/2015	ND	1.75	87.4	2.00	2.36		
Toluene*	<0.050	0.050	08/05/2015	ND	1.71	85.7	2.00	2.07		
Ethylbenzene*	<0.050	0.050	08/05/2015	ND	1.79	89.5	2.00	4.00		
Total Xylenes*	<0.150	0.150	08/05/2015	ND	4.68	77.9	6.00	3.50		
Total BTX	<0.300	0.300	08/05/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 121 % 85.6-137

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	08/10/2015	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/04/2015	ND	197	98.7	200	0.790	
DRO >C10-C28	<10.0	10.0	08/04/2015	ND	178	88.9	200	4.52	

Surrogate: 1-Chlorooctane 107 % 47.2-157

Surrogate: 1-Chlorooctadecane 118 % 52.1-176

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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Received:	08/03/2015	Sampling Date:	07/31/2015
Reported:	08/11/2015	Sampling Type:	Soil
Project Name:	COVINGTON A FED #9 CTB	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: SP1 @ 3' (H502008-03)**

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/05/2015	ND	1.75	87.4	2.00	2.36	
Toluene*	<0.050	0.050	08/05/2015	ND	1.71	85.7	2.00	2.07	
Ethylbenzene*	<0.050	0.050	08/05/2015	ND	1.79	89.5	2.00	4.00	
Total Xylenes*	<0.150	0.150	08/05/2015	ND	4.68	77.9	6.00	3.50	
Total BTX	<0.300	0.300	08/05/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 121 % 85.6-137

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	112	16.0	08/10/2015	ND	416	104	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/04/2015	ND	197	98.7	200	0.790	
DRO >C10-C28	<10.0	10.0	08/04/2015	ND	178	88.9	200	4.52	

Surrogate: 1-Chlorooctane 107 % 47.2-157

Surrogate: 1-Chlorooctadecane 127 % 52.1-176

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:	08/03/2015	Sampling Date:	07/31/2015
Reported:	08/11/2015	Sampling Type:	Soil
Project Name:	COVINGTON A FED #9 CTB	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: SP2 @ 1' (H502008-04)**

BTX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/05/2015	ND	1.75	87.4	2.00	2.36		
Toluene*	<0.050	0.050	08/05/2015	ND	1.71	85.7	2.00	2.07		
Ethylbenzene*	<0.050	0.050	08/05/2015	ND	1.79	89.5	2.00	4.00		
Total Xylenes*	<0.150	0.150	08/05/2015	ND	4.68	77.9	6.00	3.50		
Total BTX	<0.300	0.300	08/05/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 125 % 85.6-137

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	432	16.0	08/10/2015	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/04/2015	ND	197	98.7	200	0.790	
DRO >C10-C28	<10.0	10.0	08/04/2015	ND	178	88.9	200	4.52	

Surrogate: 1-Chlorooctane 102 % 47.2-157

Surrogate: 1-Chlorooctadecane 130 % 52.1-176

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:	08/03/2015	Sampling Date:	07/31/2015
Reported:	08/11/2015	Sampling Type:	Soil
Project Name:	COVINGTON A FED #9 CTB	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: SP2 @ 2' (H502008-05)**

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/05/2015	ND	1.75	87.4	2.00	2.36		
Toluene*	<0.050	0.050	08/05/2015	ND	1.71	85.7	2.00	2.07		
Ethylbenzene*	<0.050	0.050	08/05/2015	ND	1.79	89.5	2.00	4.00		
Total Xylenes*	<0.150	0.150	08/05/2015	ND	4.68	77.9	6.00	3.50		
Total BTEx	<0.300	0.300	08/05/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 124 % 85.6-137

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	288	16.0	08/10/2015	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/04/2015	ND	197	98.7	200	0.790	
DRO >C10-C28	<10.0	10.0	08/04/2015	ND	178	88.9	200	4.52	

Surrogate: 1-Chlorooctane 91.8 % 47.2-157

Surrogate: 1-Chlorooctadecane 117 % 52.1-176

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:	08/03/2015	Sampling Date:	07/31/2015
Reported:	08/11/2015	Sampling Type:	Soil
Project Name:	COVINGTON A FED #9 CTB	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: SP2 @ 3' (H502008-06)**

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/05/2015	ND	1.75	87.4	2.00	2.36		
Toluene*	<0.050	0.050	08/05/2015	ND	1.71	85.7	2.00	2.07		
Ethylbenzene*	<0.050	0.050	08/05/2015	ND	1.79	89.5	2.00	4.00		
Total Xylenes*	<0.150	0.150	08/05/2015	ND	4.68	77.9	6.00	3.50		
Total BTEX	<0.300	0.300	08/05/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 121 % 85.6-137

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	08/10/2015	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/05/2015	ND	197	98.7	200	0.790	
DRO >C10-C28	<10.0	10.0	08/05/2015	ND	178	88.9	200	4.52	

Surrogate: 1-Chlorooctane 101 % 47.2-157

Surrogate: 1-Chlorooctadecane 127 % 52.1-176

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Analytical Results For:**

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

Received:	08/03/2015	Sampling Date:	07/31/2015
Reported:	08/11/2015	Sampling Type:	Soil
Project Name:	COVINGTON A FED #9 CTB	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: SP3 @ 1' (H502008-07)**

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/05/2015	ND	1.75	87.4	2.00	2.36		
Toluene*	<0.050	0.050	08/05/2015	ND	1.71	85.7	2.00	2.07		
Ethylbenzene*	<0.050	0.050	08/05/2015	ND	1.79	89.5	2.00	4.00		
Total Xylenes*	<0.150	0.150	08/05/2015	ND	4.68	77.9	6.00	3.50		
Total BTEx	<0.300	0.300	08/05/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 124 % 85.6-137

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	400	16.0	08/10/2015	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/05/2015	ND	197	98.7	200	0.790	
DRO >C10-C28	<10.0	10.0	08/05/2015	ND	178	88.9	200	4.52	

Surrogate: 1-Chlorooctane 101 % 47.2-157

Surrogate: 1-Chlorooctadecane 129 % 52.1-176

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Analytical Results For:**

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

Received:	08/03/2015	Sampling Date:	07/31/2015
Reported:	08/11/2015	Sampling Type:	Soil
Project Name:	COVINGTON A FED #9 CTB	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: SP3 @ 2' (H502008-08)**

BTX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/05/2015	ND	1.75	87.4	2.00	2.36		
Toluene*	<0.050	0.050	08/05/2015	ND	1.71	85.7	2.00	2.07		
Ethylbenzene*	<0.050	0.050	08/05/2015	ND	1.79	89.5	2.00	4.00		
Total Xylenes*	<0.150	0.150	08/05/2015	ND	4.68	77.9	6.00	3.50		
Total BTX	<0.300	0.300	08/05/2015	ND						

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	80.0	16.0	08/10/2015	ND	416	104	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/05/2015	ND	197	98.7	200	0.790	
DRO >C10-C28	<10.0	10.0	08/05/2015	ND	178	88.9	200	4.52	

Surrogate: 1-Chlorooctane 105 % 47.2-157

Surrogate: 1-Chlorooctadecane 133 % 52.1-176

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Celey D. Keene, Lab Director/Quality Manager

**Analytical Results For:**

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

Received:	08/03/2015	Sampling Date:	07/31/2015
Reported:	08/11/2015	Sampling Type:	Soil
Project Name:	COVINGTON A FED #9 CTB	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: SP3 @ 3' (H502008-09)**

BTX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/05/2015	ND	1.75	87.4	2.00	2.36		
Toluene*	<0.050	0.050	08/05/2015	ND	1.71	85.7	2.00	2.07		
Ethylbenzene*	<0.050	0.050	08/05/2015	ND	1.79	89.5	2.00	4.00		
Total Xylenes*	<0.150	0.150	08/05/2015	ND	4.68	77.9	6.00	3.50		
Total BTX	<0.300	0.300	08/05/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 120 % 85.6-137

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	08/10/2015	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/05/2015	ND	197	98.7	200	0.790	
DRO >C10-C28	<10.0	10.0	08/05/2015	ND	178	88.9	200	4.52	

Surrogate: 1-Chlorooctane 101 % 47.2-157

Surrogate: 1-Chlorooctadecane 129 % 52.1-176

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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 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



# CARDINAL LABORATORIES

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

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: BBC International, Inc.		P.O. #:		BILL TO											
Project Manager: Cliff Brunson		Company:		ANALYSIS REQUEST											
Address: P.O. Box 805		Attn:													
City: Hobbs		Address:													
Phone #: 575-397-6388		City:													
Fax #: 575-397-0397		State:													
Project #:		Zip:													
Project Name: Carlington A Fed # 9 CTB		Phone #:													
Project Location:		Fax #:													
Sampler Name: Roger Hernandez															
FOR LAB USE ONLY															
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:							
								DATE				TIME			
H502008		SP101		G1		1		7.3.15				9:25		TPH	
1		2		G1		1		7.3.15				9:48		BTEX	
2		3		G1		1		7.3.15				10:12		CHLORIDE	
3		SP201		G1		1		7.3.15				10:59			
4		1		G1		1		7.3.15				11:12			
5		2		G1		1		7.3.15				11:38			
6		3		G1		1		7.3.15				12:25			
7		2		G1		1		7.3.15				12:48			
8		3		G1		1		7.3.15				1:11			
9				G1		1									
10				G1		1									
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Relinquished By: Roger Hernandez		Date: 8-3-15		Received By: Roger Hernandez		Date: 8-3-15		Time: 4:55		Sample Condition: Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/>		CHECKED BY: (Initials)		REMARKS:	
Relinquished By: Roger Hernandez		Date: 8-3-15		Received By: Roger Hernandez		Date: 8-3-15		Time: 4:55		Sample Condition: Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/>		CHECKED BY: (Initials)		REMARKS:	
Delivered By: (Circle One) <input checked="" type="checkbox"/> UPS <input type="checkbox"/> Bus <input type="checkbox"/> Other:															

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

## Kathy Purvis

---

**From:** Keyes, Jamie, EMNRD <Jamie.Keyes@state.nm.us>  
**Sent:** Tuesday, August 18, 2015 12:51 PM  
**To:** Cliff Brunson; Jones, Kellie, EMNRD  
**Cc:** Oberding, Tomas, EMNRD; C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis; Tucker, Shelly  
**Subject:** RE: OXY Covington A Federal #9 CTB - Remediation Plan

Good afternoon,

The plan has been approved. Ensure BLM concurrence/approval.

Thank you,

---

**From:** Cliff Brunson [<mailto:cbrunson@bbcinternational.com>]  
**Sent:** Monday, August 17, 2015 2:47 PM  
**To:** Jones, Kellie, EMNRD  
**Cc:** Keyes, Jamie, EMNRD; Oberding, Tomas, EMNRD; C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** OXY Covington A Federal #9 CTB - Remediation Plan

Kellie,

This e-mail is to confirm our discussion on Friday, August 14, 2015 concerning the remediation plan for the Oxy Covington A Federal #9 CTB. I have attached the information packet that we used in our discussion with a cover page describing the remediation plan that we agreed upon.

If you would please reply back via e-mail with your concurrence on this plan, it would be greatly appreciated.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS  
President  
BBC International, Inc.  
World-Wide Environmental Specialists  
Mailing Address:  
P. O. Box 805  
Hobbs, NM 88241-0805 USA  
Shipping Address:  
1324 W. Marland St.  
Hobbs, NM 88240 USA  
Phone: (575) 397-6388  
Fax: (575) 397-0397  
E-Mail: [cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)

\*\*\*\*\*  
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\*\*\*\*\*

## Kathy Purvis

---

**From:** Tucker, Shelly <stucker@blm.gov>  
**Sent:** Wednesday, August 19, 2015 11:28 AM  
**To:** Keyes, Jamie, EMNRD  
**Cc:** Cliff Brunson; Jones, Kellie, EMNRD; Oberding, Tomas, EMNRD; C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** Re: OXY Covington A Federal #9 CTB - Remediation Plan

BLM accepts/approves your Work Plan.

The BLM 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.

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

Sincerely,

*Shelly J Tucker*

Environmental Protection Specialist  
Bureau of Land Management

620 E. Greene St  
Carlsbad, NM 88220

575.234.5905 - Direct  
575.361.0084 - Cellular

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



On Tue, Aug 18, 2015 at 12:51 PM, Keyes, Jamie, EMNRD <[Jamie.Keyes@state.nm.us](mailto:Jamie.Keyes@state.nm.us)> wrote:

Good afternoon,

The plan has been approved. Ensure BLM concurrence/approval.

Thank you,

---

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

**Sent:** Monday, August 17, 2015 2:47 PM

**To:** Jones, Kellie, EMNRD

**Cc:** Keyes, Jamie, EMNRD; Oberding, Tomas, EMNRD; C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis

**Subject:** OXY Covington A Federal #9 CTB - Remediation Plan

Kellie,

This e-mail is to confirm our discussion on Friday, August 14, 2015 concerning the remediation plan for the Oxy Covington A Federal #9 CTB. I have attached the information packet that we used in our discussion with a cover page describing the remediation plan that we agreed upon.

If you would please reply back via e-mail with your concurrence on this plan, it would be greatly appreciated.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS

President

BBC International, Inc.

World-Wide Environmental Specialists

Mailing Address:

P. O. Box 805

Hobbs, NM 88241-0805 USA

Shipping Address:

1324 W. Marland St.

Hobbs, NM 88240 USA

Phone: (575) 397-6388

Fax: (575) 397-0397

E-Mail: [cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)

\*\*\*\*\*

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