

PHONE (575) 397-6388 • FAX (575) 397- 0397 • 1324 W. MARLAND • P.O. BOX 805 • HOBBS, NM 88241-0805 E-MAIL: cbrunson@bbcinternational.com

DELINEATION WORKPLAN

OXY – RED TANK 28 FEDERAL #1 CTB (Leak Date: 6/20/17)

RP # 1RP-4741 API # 30-025-31661

This delineation workplan and remediation proposal addresses the release associated with RP # 1RP-4741.

The following information includes:

- 1. Scaled digital site map with spill area demarcated and leak point identified along with sample point locations and areas of remediation at appropriate depths.
- 2. GPS information for sample points and sample methodology
- 3. Depth to groundwater information (i.e., pdf of OSE search results and/or copy of Chevron groundwater trend map).
- 4. Laboratory analysis results summary table and original laboratory analysis reports
- 5. A copy of the initial C-141
- 6. Potentially other pertinent information as necessary for site specific purposes.

Based on the information included in this package and the NMOCD guidelines, the following remediation is proposed:

OXY will excavate the spill area as depicted on the following site diagram. The entire leak area will be excavated to a depth of 3.5 feet.

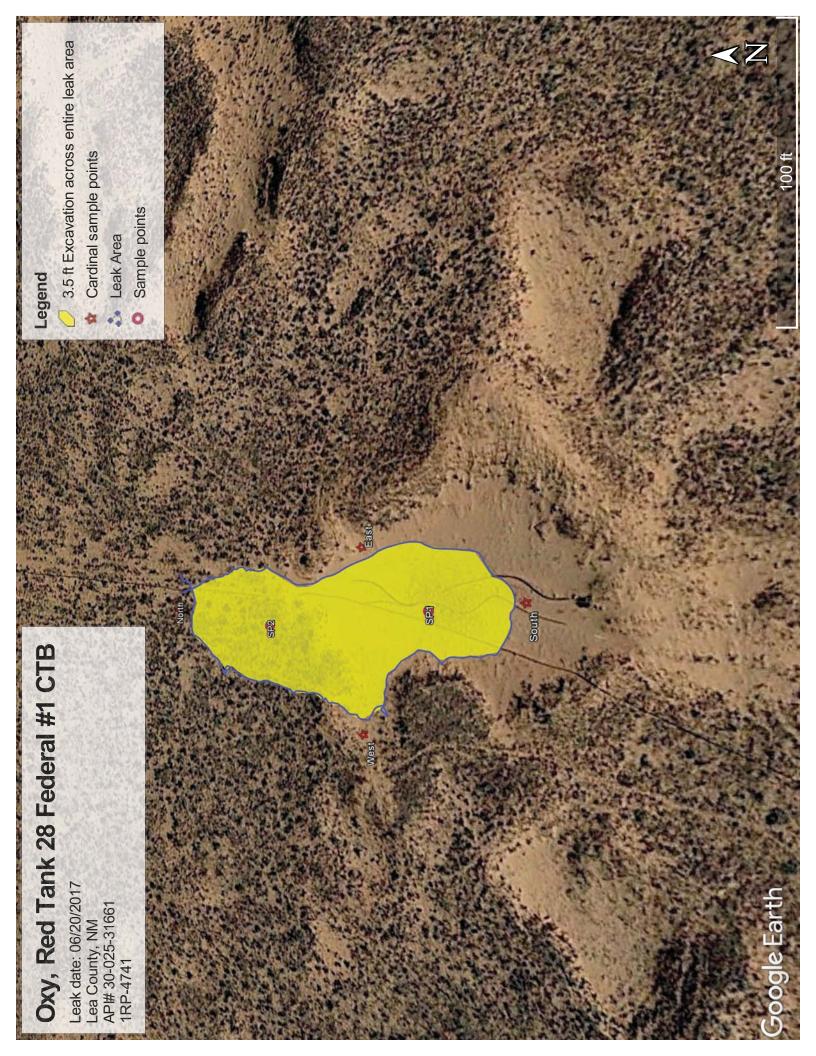
The entire site will then be backfilled with clean soil and revegetated (if warranted) to the standards of the appropriate regulatory agency or private surface owner.

All excavated materials will be disposed of at an NMOCD-approved disposal facility.

APPROVED

By Olivia Yu at 9:59 am, Dec 08, 2017

NMOCD approves of the delineation and proposed remediation for 1RP-4741.



Oxy, Red Tank 28 Federal #1 CTB

Sample points,

SP1, N 32.36377 W-103.67222

SP2, N 32.36401 W-103.67225

NORTH, N 32.36417 W-103.67224

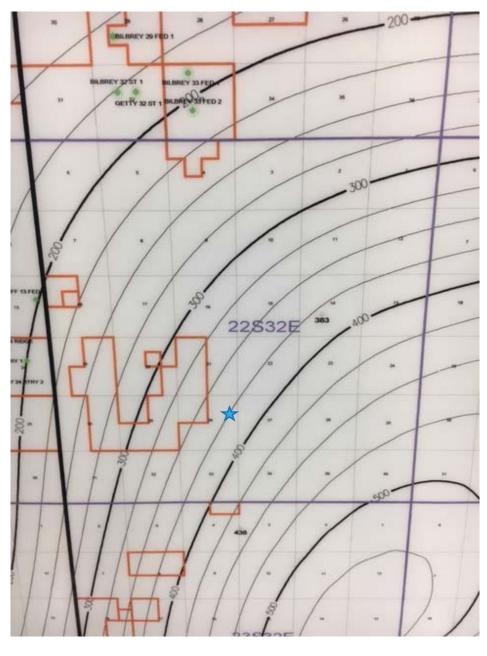
SOUTH, N 32.36365 W-103.67220

EAST, N 32.36386 W-103.67214

WEST, N 32.36386 W-103.67239

Oxy, Red Tank 28 Federal #1 CTB U/L H, Section 28, T22S, R32E

Groundwater: 375'





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): 624827 **Northing (Y):** 3581607 **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.

6/26/17 10:57 AM

WATER COLUMN/ AVERAGE DEPTH TO WATER

O	Public Land Survey System (PLSS) Q64: Q16: SE Q4: NE Sec: 28 Tws: 22S Rng: 32E
C	State Plane Coordinate System - NAD27 X: 0 ft Y: 0 ft Zone:
C	State Plane Coordinate System - NAD83 X: 0 ft Y: 0 ft Zone:
	Degrees/Minutes/Seconds Longitude (X): Degrees: 0 ° Minutes: 0 ' Seconds: 0 " Latitude (Y): Degrees: 0 ° Minutes: 0 ' Seconds: 0 "
O	UTM - NAD27 Description: Descr
	SUBMIT
	All Conversion Results are displayed as NAD 1983 UTM Zone 13 Easting (X): 624827.0 mtrs Northing (Y): 3581607.0 mtrs ~~ Please keep screen open to copy UTM values for Reports. ~~

Laboratory Analytical Results Summary Red Tank 28 Federal #1 CTB

		Sample	SP1 @ 1.	SP1@3	SP1 @ 5'	SP1 @ 7	SP1 @ 8'
Analyte	Method	Date	21/91/8	8/16/17	8/16/17	8/16/17	21/91/8
			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.050	<0.050	<0.050	<0.050	<0.050
Toluene	BTEX 8021B		0.164	699'0	<0.050	<0.050	<0.050
Ethylbenzene BTEX 8021B	BTEX 8021B		050.0>	<0.050	<0.050	<0.050	<0.050
Total Xylenes	otal Xylenes BTEX 8021B		1.53	3.43	<0.150	<0.150	<0.150
Total BTEX	BTEX 8021B		1.69	4.09	<0.300	<0.300	<0.300
Chloride	SM4500CI-B		224	784	336	480	887
GRO	TPH 8015M		234	792	<10.0	<10.0	<10.0
DRO	TPH 8015M		0209	0698	<10.0	26.8	11
EXT DRO	TPH 8015M		1080	1400	<10.0	<10.0	<10.0

		Sample	SP2 @ 1'	SP2 @ 3'	SP2 @ 5'	SP2 @ 7'	SP2 @ 8'	SP2 @ 9'
Analyte	Method	Date	8/16/17	8/16/17	8/16/17	8/16/17	8/16/17	8/16/17
			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.050	005.0>	<0.050	<0.050	<0.050	<0.050
Toluene	BTEX 8021B		0.143	999'0	<0.050	<0.050	<0.050	<0.050
Ethylbenzene BTEX 8021B	BTEX 8021B		<0.050	005.0>	<0.050	<0.050	<0.050	<0.050
Total Xylenes BTEX 8021B	BTEX 8021B		1.15	<0.150	<0.150	<0.150	<0.150	<0.150
Total BTEX	BTEX 8021B		1.29	<0.300	<0.300	008'0>	<0.300	<0.300
Chloride	SM4500CI-B		320	898	400	416	320	320
GRO	TPH 8015M		202	206	<10.0	<10.0	<10.0	<10.0
DRO	TPH 8015M		6250	10200	<10.0	19.1	<10.0	<10.0
EXT DRO	TPH 8015M		1140	1650	<10.0	<10.0	<10.0	<10.0

		Sample	NORTH @ SURFACE
Analyte	Method	Date	21/91/8
			mg/Kg
Chloride S	SM4500CI-B		<16.0

		Sample	SURFACE
Analyte	Method	Date	8/16/17
			mg/Kg
Chloride	SM4500CI-B		<16.0
		Sample	WEST @ SURFACE
Analyte	Method	Date	8/16/17
			mg/Kg
- P.			97

		Sample	SOUTH @ SURFACE
Analyte	Method	Date	8/16/17
			mg/Kg
Chloride	SM4500CI-B		16



August 24, 2017

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: RED TANK 28 FED #1 CTB

Enclosed are the results of analyses for samples received by the laboratory on 08/17/17 13:05.

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. Keene

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: 08/17/2017 Sampling Date: 08/16/2017

Reported: 08/24/2017 Sampling Type: Soil

Project Name: RED TANK 28 FED #1 CTB Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Jodi Henson

Project Location: LEA COUNTY

Sample ID: SP 1 @ 1 (H702189-01)

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	08/23/2017	ND	1.96	98.0	2.00	1.28	
Toluene*	0.164	0.050	08/23/2017	ND	1.81	90.7	2.00	0.638	
Ethylbenzene*	<0.050	0.050	08/23/2017	ND	1.84	92.0	2.00	1.42	
Total Xylenes*	1.53	0.150	08/23/2017	ND	5.53	92.2	6.00	1.69	
Total BTEX	1.69	0.300	08/23/2017	ND					
Surrogate: 4-Bromofluorobenzene (PID	109 9	% 72-148							
Chloride, SM4500Cl-B	mg/	'kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	224	16.0	08/19/2017	ND	416	104	400	0.00	
TPH 8015M	mg/	/kg	Analyze	d By: MS					S-06
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	234	50.0	08/21/2017	ND	177	88.5	200	2.45	
DRO >C10-C28	6070	50.0	08/21/2017	ND	176	87.8	200	4.19	
EXT DRO >C28-C36	1080	50.0	08/21/2017	ND					
Surrogate: 1-Chlorooctane	132 9	% 28.3-16	4						
Surrogate: 1-Chlorooctadecane	177 9	% 34.7-15	7						

Cardinal Laboratories *=Accredited Analyte

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BBC International, Inc.

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

Fax To: (575) 397-0397

Received: 08/17/2017 Sampling Date: 08/16/2017

Reported: 08/24/2017 Sampling Type: Soil

Project Name: RED TANK 28 FED #1 CTB Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Jodi Henson

Analyzed By: MS

Project Location: LEA COUNTY

mg/kg

Sample ID: SP 1 @ 3 (H702189-02)

BTEX 8021B

	9/149		Andryzo	.u 5 y						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/23/2017	ND	1.96	98.0	2.00	1.28		
Toluene*	0.659	0.050	08/23/2017	ND	1.81	90.7	2.00	0.638		
Ethylbenzene*	<0.050	0.050	08/23/2017	ND	1.84	92.0	2.00	1.42		
Total Xylenes*	3.43	0.150	08/23/2017	ND	5.53	92.2	6.00	1.69		
Total BTEX	4.09	0.300	08/23/2017	ND						
Surrogate: 4-Bromofluorobenzene (PID	199	% 72-148								
Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	784	16.0	08/19/2017	ND	416	104	400	0.00		
TPH 8015M	mg,	/kg	Analyze	d By: MS					S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	792	50.0	08/21/2017	ND	177	88.5	200	2.45		
DRO >C10-C28	8590	50.0	08/21/2017	ND	176	87.8	200	4.19		
EXT DRO >C28-C36	1400	50.0	08/21/2017	ND						
Surrogate: 1-Chlorooctane	177	% 28.3-16	4							

Surrogate: 1-Chlorooctahee 1//% 28.3-104
Surrogate: 1-Chlorooctahecahe 216 % 34.7-157

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Celey D. Keene

S-04



BBC International, Inc.

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

Fax To: (575) 397-0397

Received: 08/17/2017 Sampling Date: 08/16/2017

Reported: 08/24/2017 Sampling Type: Soil

Project Name: RED TANK 28 FED #1 CTB Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Jodi Henson

Analyzed By: MC

Project Location: LEA COUNTY

ma/ka

Sample ID: SP 1 @ 5 (H702189-03)

RTFY 8021R

B1EX 8021B	mg/	kg	Anaiyze	а ву: мѕ					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/23/2017	ND	1.96	98.0	2.00	1.28	
Toluene*	<0.050	0.050	08/23/2017	ND	1.81	90.7	2.00	0.638	
Ethylbenzene*	<0.050	0.050	08/23/2017	ND	1.84	92.0	2.00	1.42	
Total Xylenes*	<0.150	0.150	08/23/2017	ND	5.53	92.2	6.00	1.69	
Total BTEX	<0.300	0.300	08/23/2017	ND					
Surrogate: 4-Bromofluorobenzene (PID	104 %	6 72-148							
Chloride, SM4500CI-B	mg/	kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	336	16.0	08/19/2017	ND	416	104	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	08/21/2017	ND	177	88.5	200	2.45	
DRO >C10-C28	<10.0	10.0	08/21/2017	ND	176	87.8	200	4.19	
EXT DRO >C28-C36	<10.0	10.0	08/21/2017	ND					
Surrogate: 1-Chlorooctane	89.5 %	6 28.3-16-	4						
Surrogate: 1-Chlorooctadecane	96.0 %	6 34.7-15	7						

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BBC International, Inc.

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

Fax To: (575) 397-0397

Received: 08/17/2017 Sampling Date: 08/16/2017

Reported: 08/24/2017 Sampling Type: Soil

Project Name: RED TANK 28 FED #1 CTB Sampling Condition: Cool & Intact Sample Received By: Project Number: NONE GIVEN Jodi Henson

Project Location: LEA COUNTY

Sample ID: SP 1 @ 7 (H702189-04)

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	08/23/2017	ND	1.96	98.0	2.00	1.28	
Toluene*	<0.050	0.050	08/23/2017	ND	1.81	90.7	2.00	0.638	
Ethylbenzene*	<0.050	0.050	08/23/2017	ND	1.84	92.0	2.00	1.42	
Total Xylenes*	<0.150	0.150	08/23/2017	ND	5.53	92.2	6.00	1.69	
Total BTEX	<0.300	0.300	08/23/2017	ND					
Surrogate: 4-Bromofluorobenzene (PID	104 9	% 72-148	3						
Chloride, SM4500CI-B	mg/	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	480	16.0	08/19/2017	ND	416	104	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	08/20/2017	ND	181	90.4	200	6.61	
DRO >C10-C28	26.8	10.0	08/20/2017	ND	184	91.9	200	7.97	
EXT DRO >C28-C36	<10.0	10.0	08/20/2017	ND					
Surrogate: 1-Chlorooctane	83.9	% 28.3-16	4						
Surrogate: 1-Chlorooctadecane	95.5	% 34.7-15	7						

Surrogate: 1-Chlorooctadecane 95.5 %

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BBC International, Inc.

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

Fax To: (575) 397-0397

Received: 08/17/2017 Sampling Date: 08/16/2017

Reported: 08/24/2017 Sampling Type: Soil

Project Name: RED TANK 28 FED #1 CTB Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Jodi Henson

Analyzed By: MC

Project Location: LEA COUNTY

ma/ka

Sample ID: SP 1 @ 8 (H702189-05)

RTFY 8021R

B1EX 8021B	mg/	кд	Anaiyze	а ву: мѕ	- DC				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/22/2017	ND	2.02	101	2.00	1.51	
Toluene*	<0.050	0.050	08/22/2017	ND	1.85	92.5	2.00	1.80	
Ethylbenzene*	<0.050	0.050	08/22/2017	ND	1.92	95.8	2.00	2.27	
Total Xylenes*	<0.150	0.150	08/22/2017	ND	5.74	95.7	6.00	1.64	
Total BTEX	<0.300	0.300	08/22/2017	ND					
Surrogate: 4-Bromofluorobenzene (PID	107 9	% 72-148	,						
Chloride, SM4500Cl-B	mg/	kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	288	16.0	08/19/2017	ND	416	104	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	08/20/2017	ND	181	90.4	200	6.61	
DRO >C10-C28	11.0	10.0	08/20/2017	ND	184	91.9	200	7.97	
EXT DRO >C28-C36	<10.0	10.0	08/20/2017	ND					
Surrogate: 1-Chlorooctane	82.3	% 28.3-16	4						
Surrogate: 1-Chlorooctadecane	88.8	% 34.7-15	7						

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

Fax To: (575) 397-0397

Received: 08/17/2017 Sampling Date: 08/16/2017

Reported: 08/24/2017 Sampling Type: Soil

Project Name: RED TANK 28 FED #1 CTB Sampling Condition: Cool & Intact Project Number: Sample Received By: NONE GIVEN Jodi Henson

Project Location: LEA COUNTY

Sample ID: SP 2 @ 1 (H702189-06)

BTEX 8021B	mg/	kg	Analyze	d By: MS					S-04
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/22/2017	ND	2.02	101	2.00	1.51	
Toluene*	0.143	0.050	08/22/2017	ND	1.85	92.5	2.00	1.80	
Ethylbenzene*	<0.050	0.050	08/22/2017	ND	1.92	95.8	2.00	2.27	
Total Xylenes*	1.15	0.150	08/22/2017	ND	5.74	95.7	6.00	1.64	
Total BTEX	1.29	0.300	08/22/2017	ND					
Surrogate: 4-Bromofluorobenzene (PID	155 9	% 72-148	}						
Chloride, SM4500Cl-B	mg/	'kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	320	16.0	08/19/2017	ND	416	104	400	0.00	
TPH 8015M	mg/	'kg	Analyze	d By: MS					S-06
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	207	50.0	08/20/2017	ND	181	90.4	200	6.61	
DRO >C10-C28	6250	50.0	08/20/2017	ND	184	91.9	200	7.97	
EXT DRO >C28-C36	1140	50.0	08/20/2017	ND					
Surrogate: 1-Chlorooctane	126 9	% 28.3-16	4						

Surrogate: 1-Chlorooctadecane 184 % 34.7-157

Cardinal Laboratories *=Accredited Analyte

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Celey D. Keene



BBC International, Inc.

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

Fax To: (575) 397-0397

Received: 08/17/2017 Sampling Date: 08/16/2017

Reported: 08/24/2017 Sampling Type: Soil

Project Name: RED TANK 28 FED #1 CTB Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Jodi Henson

Analyzed By: MC

Project Location: LEA COUNTY

ma/ka

Sample ID: SP 2 @ 3 (H702189-07)

RTFY 8021R

BIEX 8021B	mg	/кд	Anaiyze	а ву: м5					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.500	0.500	08/22/2017	ND	2.02	101	2.00	1.51	
Toluene*	0.656	0.500	08/22/2017	ND	1.85	92.5	2.00	1.80	
Ethylbenzene*	<0.500	0.500	08/22/2017	ND	1.92	95.8	2.00	2.27	
Total Xylenes*	6.01	1.50	08/22/2017	ND	5.74	95.7	6.00	1.64	
Total BTEX	6.66	3.00	08/22/2017	ND					
Surrogate: 4-Bromofluorobenzene (PID	121	% 72-148	}						
Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	368	16.0	08/19/2017	ND	416	104	400	0.00	
TPH 8015M	mg,	/kg	Analyze	d By: MS					S-06
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	907	50.0	08/20/2017	ND	181	90.4	200	6.61	
DRO >C10-C28	10200	50.0	08/20/2017	ND	184	91.9	200	7.97	
EXT DRO >C28-C36	1650	50.0	08/20/2017	ND					
Surrogate: 1-Chlorooctane	189	% 28.3-16	4						
Surrogate: 1-Chlorooctadecane	256	% 34.7-15	7						

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BBC International, Inc.

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

Fax To: (575) 397-0397

Received: 08/17/2017 Sampling Date: 08/16/2017

Reported: 08/24/2017 Sampling Type: Soil

Project Name: RED TANK 28 FED #1 CTB Sampling Condition: Cool & Intact Sample Received By: Project Number: NONE GIVEN Jodi Henson

Project Location: LEA COUNTY

Sample ID: SP 2 @ 5 (H702189-08)

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	08/22/2017	ND	2.02	101	2.00	1.51	
Toluene*	< 0.050	0.050	08/22/2017	ND	1.85	92.5	2.00	1.80	
Ethylbenzene*	<0.050	0.050	08/22/2017	ND	1.92	95.8	2.00	2.27	
Total Xylenes*	<0.150	0.150	08/22/2017	ND	5.74	95.7	6.00	1.64	
Total BTEX	<0.300	0.300	08/22/2017	ND					
Surrogate: 4-Bromofluorobenzene (PID	105 %	% 72-148							
Chloride, SM4500Cl-B	mg/	kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	400	16.0	08/19/2017	ND	416	104	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	08/21/2017	ND	177	88.5	200	2.45	
DRO >C10-C28	<10.0	10.0	08/21/2017	ND	176	87.8	200	4.19	
EXT DRO >C28-C36	<10.0	10.0	08/21/2017	ND					
Surrogate: 1-Chlorooctane	81.0 9	% 28.3-16	4						
Surrogate: 1-Chlorooctadecane	90.0	% 34.7-15	7						

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BBC International, Inc.

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

Fax To: (575) 397-0397

Received: 08/17/2017 Sampling Date: 08/16/2017

Reported: 08/24/2017 Sampling Type: Soil

Project Name: RED TANK 28 FED #1 CTB Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Jodi Henson

Analyzed By: MC

Project Location: LEA COUNTY

ma/ka

Sample ID: SP 2 @ 7 (H702189-09)

RTFY 8021R

	mg/	··· ·	Anaryzo	а ву: м5					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/22/2017	ND	2.02	101	2.00	1.51	
Toluene*	<0.050	0.050	08/22/2017	ND	1.85	92.5	2.00	1.80	
Ethylbenzene*	<0.050	0.050	08/22/2017	ND	1.92	95.8	2.00	2.27	
Total Xylenes*	<0.150	0.150	08/22/2017	ND	5.74	95.7	6.00	1.64	
Total BTEX	<0.300	0.300	08/22/2017	ND					
Surrogate: 4-Bromofluorobenzene (PID	106 %	6 72-148	,						
Chloride, SM4500Cl-B	mg/	kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	416	16.0	08/19/2017	ND	416	104	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	08/21/2017	ND	177	88.5	200	2.45	
DRO >C10-C28	19.7	10.0	08/21/2017	ND	176	87.8	200	4.19	
EXT DRO >C28-C36	<10.0	10.0	08/21/2017	ND					
Surrogate: 1-Chlorooctane	84.2 %	% 28.3-16-	4						
Surrogate: 1-Chlorooctadecane	88.69	6 34.7-15	7						

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BBC International, Inc.

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

Fax To: (575) 397-0397

Received: 08/17/2017 Sampling Date: 08/16/2017

Reported: 08/24/2017 Sampling Type: Soil

Project Name: RED TANK 28 FED #1 CTB Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Jodi Henson

Project Location: LEA COUNTY

Sample ID: SP 2 @ 8 (H702189-10)

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	08/22/2017	ND	2.02	101	2.00	1.51	
Toluene*	<0.050	0.050	08/22/2017	ND	1.85	92.5	2.00	1.80	
Ethylbenzene*	<0.050	0.050	08/22/2017	ND	1.92	95.8	2.00	2.27	
Total Xylenes*	<0.150	0.150	08/22/2017	ND	5.74	95.7	6.00	1.64	
Total BTEX	<0.300	0.300	08/22/2017	ND					
Surrogate: 4-Bromofluorobenzene (PID	105	% 72-148	}						
Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	320	16.0	08/19/2017	ND	416	104	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	08/21/2017	ND	177	88.5	200	2.45	
DRO >C10-C28	<10.0	10.0	08/21/2017	ND	176	87.8	200	4.19	
EXT DRO >C28-C36	<10.0	10.0	08/21/2017	ND					
Surrogate: 1-Chlorooctane	87.6	% 28.3-16	4						
Surrogate: 1-Chlorooctadecane	92.5	% 34.7-15	7						

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BBC International, Inc.

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

Fax To: (575) 397-0397

Received: 08/17/2017 Sampling Date: 08/16/2017

Reported: 08/24/2017 Sampling Type: Soil

Project Name: RED TANK 28 FED #1 CTB Sampling Condition: Cool & Intact Sample Received By: Jodi Henson Project Number: NONE GIVEN

Project Location: LEA COUNTY

Sample ID: SP 2 @ 9 (H702189-11)

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	08/22/2017	ND	2.02	101	2.00	1.51	
Toluene*	< 0.050	0.050	08/22/2017	ND	1.85	92.5	2.00	1.80	
Ethylbenzene*	< 0.050	0.050	08/22/2017	ND	1.92	95.8	2.00	2.27	
Total Xylenes*	<0.150	0.150	08/22/2017	ND	5.74	95.7	6.00	1.64	
Total BTEX	<0.300	0.300	08/22/2017	ND					
Surrogate: 4-Bromofluorobenzene (PID	105 %	% 72-148	}						
Chloride, SM4500Cl-B	mg/	kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	320	16.0	08/19/2017	ND	416	104	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	08/21/2017	ND	177	88.5	200	2.45	
DRO >C10-C28	<10.0	10.0	08/21/2017	ND	176	87.8	200	4.19	
EXT DRO >C28-C36	<10.0	10.0	08/21/2017	ND					
Surrogate: 1-Chlorooctane	83.1 9	% 28.3-16	4						
Surrogate: 1-Chlorooctadecane	86.19	% 34.7-15	7						

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Notes and Definitions

S-06 The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or

matrix interference's.

S-04 The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.

QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS

ecovery.

ND Analyte NOT DETECTED at or above the reporting limit

RPD Relative Percent Difference

** Samples not received at proper temperature of 6°C or below.

*** Insufficient time to reach temperature.

- Chloride by SM4500Cl-B does not require samples be received at or below 6°C

Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories *=Accredited Analyte

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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

	BO #:	
		Company Name: BBC International, Inc.
ANAL	BILL TO	
2010		(505) 393-2326 FAX (505) 393-24/6
	88240	101 East Marland, Hobbs, NM 88240
		AKUINAL LADONALON
	IES	ADDINAL LABORATORIES

(505) 393-2326 FAX (505) 393-24/0		ANALYSIS BEOLIEST
Company Name: BBC International, Inc.	BILL TO	ANACIGIO REGOLO:
	P.O. #:	
30x 805	Company: ()	
obs State: NM	Zip: 88241 Attn: WOUL Ditrich	
5-397-6388 Fax #:	575-397-0397 Address:	
Project #: Project Owner:	O'X y city:	
Project Name: Red Tank 28 Fed #1	CTF) State: Zip:	
Project Location: Lee County	Phone #:	
Sampler Name: Con the Name of	Fax #:	9(
	MATRIX PRESERV. SAMPLING	+
Sample I.D.	m	SCI STEX STPHEX
(SP @	G 1 V V V V V V V V V V V V V V V V V V	
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3 SP 1 @ S	(7) V	S
2000		
	G 1 V V 1130A	
100000	G 1 V V V	3V V V
204 92	C 1 / / 1:53P	
10 Ch 45 B	C-1 4 4 51818	
8 00 E 45 01	C	DV V V

Sampler - UPS - Bus - Other: † Cardinal cannot accept verbal changes. Please fax written changes 18,505-3932476+, 2 S Cool Intact
Wes Wes

Sample Condition

CHECKED BY:

Relinquished By:

Delivered By: (Circle One Thatic Smay Relinguished By

Received By:

Thatis Gomey!

Fax Result: REMARKS:

☐ Yes

O No

Add'l Phone #: Add'l Fax #:

Page 14 of 15

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ARDINAL LABORATORIES 101 East Marland, Hobbs, NM 88240

(505) 393-2326 FAX (505) 393-24/6		
Company Name: BBC International, Inc.	BILL TO	ANALYSIS REQUEST
Project Manager: Cliff Brunson	P.O. #:	
City: Hobbs State: NM	Zip: 88241 Attn: WOULF 1) The 184	サイバス
5-397-6388 Fax #:	575-397-0397 Address:	
Project #: Project Owner: 03	: Oxy city:	
ame: Red Tunk 241	TVS 'State: Zip:	
Project Location: Lea County	Phone #:	
Sampler Name: 1660 Hamanouz	Fax #:	
FOR LAB USE ONLY	MATRIX 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 CI BTX
60-605 11		8.16 3:088 1
(Black		
NA.		
Standard liability and client's earliegue remedy for	ary claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the	amount paid by the client for the

Cool Intact
O TYes 4 Yes

Relinquished By:

Harry Done

Delivered By: (Circle One)

Relinquished B)

by client, its subsidiaries

Phone Result:
Fax Result:
REMARKS:

☐ Yes

O No

Add'l Phone #: Add'l Fax #:



August 31, 2017

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: RED TANK 28 FED #1 CTB

Enclosed are the results of analyses for samples received by the laboratory on 08/28/17 8:50.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/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. Keene

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: 08/28/2017 Sampling Date: 08/16/2017

Reported: 08/31/2017 Sampling Type: Soil

Project Name: RED TANK 28 FED #1 CTB Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Tamara Oldaker

Project Location: LEA COUNTY

Sample ID: NORTH @ SURFACE (H702266-01)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	08/30/2017	ND	432	108	400	3.64	

Sample ID: EAST @ SURFACE (H702266-02)

Chloride, SM4500Cl-B	mg,	/kg	Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	08/30/2017	ND	432	108	400	3.64	

Sample ID: WEST @ SURFACE (H702266-03)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	08/30/2017	ND	432	108	400	3.64	

Sample ID: SOUTH @ SURFACE (H702266-04)

Chloride, SM4500CI-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	08/30/2017	ND	432	108	400	3.64	

Cardinal Laboratories *=Accredited Analyte

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Notes and Definitions

QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS

ecovery.

ND Analyte NOT DETECTED at or above the reporting limit

RPD Relative Percent Difference

** Samples not received at proper temperature of 6°C or below.

*** Insufficient time to reach temperature.

- Chloride by SM4500Cl-B does not require samples be received at or below 6°C

Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories *=Accredited Analyte

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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name:	e: BBC International, Inc.	1	- 1	- 1	-1	- 1	_		Н		8	BILL TO		١				ANALYSIS	- 1	REQUEST
Project Manage	Project Manager: Cliff Brunson							P.O. #:	#					_	4	4	_	-	-	
Address: P.C	P.O. Box 805							Company:	ng	yne	``	8			_				_	
city: Hobbs	State: NM	Zip:	88241	241				Attn:	. ·	5	8	do BH	5		_				_	
Phone #: 575-397-6388	Fax #:	575-397-0397	039	7				Address:	fres	SS:					_				_	
Project #:	Project Owner: Oxy	Оху						City:							_					
Project Name:	Project Name: Red Tank 28 Federal #1 CTB							State:	e:			Zip:			_					
Project Location:	n: Lea County, NM							Phone #:	one	#		ŀ			_				_	
Sampler Name:	: Roger Hernandez							Fax #:	#											
FOR LAB USE ONLY		2.	\top		MATRIX	R		Ц	PRE	PRESERV	2	SAMPLING	G		ì		L		-	
Lab I.D.	Sample I.D.	OR (C)OMP	IDWATER	WATER						OOL	:		,							
470336b				WASTE	SOIL	OIL	SLUDG	OTHER	ACID/BA	ICE / CC	OTHER	DATE	TIME	C						
1	NORTH @ SURFACE	_	_		5	_	\rightarrow	-	_	1	-	_	3:15 PM	1	4	4	4	+	+	
2	EAST @ SURFACE	0			1			_		1			3:22 PM	<	_	+	_	+	+	
3	WEST @ SURFACE	0			(7		8/16/17 3	3:29 PM	<		_		-	1	
7	SOUTH @ SURFACE	0			<					1		8/16/17 3	3:38 PM	<						
		_	\top				-	+	-	_				_		-			T	
		-	\top			_	+	_	_					+	+	+	_	+		
	CALASIA						_		_	_				4	_	+	_	+	+	
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LEASE NOTE: Liability a	VEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive memory for any claim acidos whether based in contract or one shall be liability and the the scientific exceptions of the scientific exceptions.							_	_		_			L	L	H	L	H		
nalyses. All claims includ ervice. In no event shall (ffiliates or successors aris	religions. All claims including those for negligence and any other cause whatoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be labely for incidental or consequental damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries. If the profit is not support to the profit of the profit is subsidiaries.	verned waived vithout limitatio rdinal regardle	wed un	windows used in unitage of use, seas the image of unless made in writing and received by Cardinal win, business interruptions, loss of use, or loss of pro- siss of whether such claim is based upon any of the	ade in	writing muptic	and o	BOSHI BOSHI BS Of L	sta or	Cardi	of pro	to the amount paid to little 30 days after or offits incurred by clies above stated reader.	by the claim for the a completion of the a int, its subsidiaries	applicable						
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† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

Corrected 4.25°C

Page 4 of 4

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

Revised April 3, 2017

Form C-141

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

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

Release Notification and Corrective Action

OPERATOR

	OPERATOR		
Name of Company Contact CASEY L SUMMERS			
Address PO BOX 4294; HOUSTON, TX 77210 Telephone No. 575-513-8289			
Facility Name RED TANK 28 FED #1 CTB	Facility Name RED TANK 28 FED #1 CTB Facility Type BATTERY		
Surface Owner Federal Mineral Owner	Federal	API No. 30-025-31661	
	N OF RELEASE		
Unit Letter Section Township Range Feet from the North	South Line Feet from the East/	West Line County	
Latitude_N 32.368930_ Lor	gitude_W -103.672350 NAD8	33	
	OF RELEASE		
Type of Release OIL & PRODUCED WATER	Volume of Release 4 bbls OIL 10 bbls PRODUCED WATER	Volume Recovered 0 bbls	
Source of Release 4 inch Poly main gas line leaked	Date and Hour of Occurrence 6/20/2017	Date and Hour of Discovery	
Was Immediate Notice Given? ☐ Yes ☐ No ☐ Not Required	If YES, To Whom? OLIVIA YU-NMOCD; SHELLY	TUCKER-BLM	
By Whom? WADE DITTRICH Date and Hour 6/22/2017 @ 11:21 AM			
Was a Watercourse Reached? If YES, Volume Impacting the Watercourse.			
If a Watercourse was Impacted, Describe Fully.*			
RECEIVED			
	By Olivia Yu at 7:47	7 am, Jun 30, 2017	
Describe Cause of Problem and Remedial Action Taken.*			
Describe Cause of Problem and Remedial Action Taken.*			
A 4 inch poly main gas line leaked and resulted in a 4 bbls oil and 10 bbls	produced water spill. No free fluids	have been recovered. The line has been	
repaired and placed back in operation.			
Describe Area Affected and Cleanup Action Taken.*			
Measurements will be given when the GPS track is completed. Remediat NMOCD and BLM.	ion will be completed in accordance v	with a remediation plan approved by the	
I hereby certify that the information given above is true and complete to t	he best of my knowledge and understa	and that pursuant to NMOCD rules and	
regulations all operators are required to report and/or file certain release n	otifications and perform corrective ac	ctions for releases which may endanger	
public health or the environment. The acceptance of a C-141 report by the	e 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, of local laws and/or regulations.			
\ / \	OIL CONSERVATION DIVISION		
Signature:		05 L	
	Approved by Environmental Speciali	st:	
	Approval Date: 6/30/2017	Expiration Date:	
= =		Expiration Date.	
	Conditions of Approval:	Attached 🖸	
Date: 6-2 - Phone: 575-390-2828	see attached directive		
Attach Additional Sheets If Necessary	1RP-4741 pOY171813	2149 nOY1718132063	

Operator/Responsible Party,

The OCD has received the form C-141 you provided on _6/27/2017_ regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number _1RP-4741__ 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 _1_ office in __Hobbs____ on or before _7/30/2017_. 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