



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

October 7, 2022

Attn: NMOCD

Re: Incident # nJXK1623555033

Upon reviewing the well files, Oxy did not find the closure report for the release that occurred on the Rum Runner 2 Fed Com #1 Battery on 8/10/16. Please find the following Closure Report that was previously submitted in 2017, but does not exist on the NMOCD website.

Regards,

A handwritten signature in black ink that reads "Cliff P. Brunson". The signature is fluid and cursive, with the first name "Cliff" being more prominent.

Cliff P. Brunson
President

Closure Report

nJXK1623555033

Site Description

Site Name:	Rum Runner 2 Fed Com #1 Battery
Company:	Oxy Permian Ltd.
Legal Description:	U/L H, Section 2, T22S, R32E
County:	Lea County, NM
GPS Coordinates:	N 32.42297° W-103.63806°

Release Data

Date of Release:	08/10/2016
Type of Release:	Produced water mixed with rain water
Source of Release:	Corrosion of a 2" steel flow line
Volume of Release:	160 bbls
Volume Recovered:	120 bbls of produced water mixed with rain water

Remediation Specifications

Remediation Parameters:	Surface scrape the areas around SP1 and SP2 to a depth of 6 inches. Obtain bottom and sidewall confirmation samples. Backfill the sire with clean soil.	
Remediation Activities:	11/01/2017 to 11/03/2017	
Plan Sent to OCD:	11/01/2016	Email from Cliff Brunson to Kristen Lynch
OCD Approval of Plan:	06/02/2017	Email from Olivia Yu to Casey Summers
Plan Sent to BLM:	11/02/2016	Email from Cliff Brunson to Shelly Tucker
SLO Approval of Plan:	11/03/2016	Email from Shelly Tucker to Cliff Brunson

Supporting Documentation

Initial C-141	Signed 08/22/2016
Final C-141	Upon completion
Site Diagram	August 2016
Groundwater Plot	275'-300'
TOPO Maps	August 2016
Lab Summary	09/27/2016 and 11/02/2017
Lab Analysis	09/27/2016 and 11/02/2017
Correspondence	Request and approval of remediation plan via email

Request for Closure

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

Wade Dittrich, Oxy Permian Ltd.

11/16/2017

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	Casey Summers
Address	6 Desta Drive, Midland, TX 79705	Telephone No.	(575) 513-8289
Facility Name	Rum Runner 2 Fed Com #1 Battery	Facility Type	Battery
Surface Owner	BLM	Mineral Owner	
		API No.	30-025-40095

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
H	2	22S	32E					Lea County, NM

Latitude N 32.42297° Longitude W 103.63806°

NATURE OF RELEASE

Type of Release	Produced water mixed with rain water	Volume of Release	160 bbls	Volume Recovered	120 bbls produced water mixed with rain water
Source of Release	Corrosion of a 2" steel flow line	Date and Hour of Occurrence	08/10/2016	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? Jamie Keyes, Kristen Lynch- NMOCD; Shelly Tucker- BLM			
By Whom?	Kathy@ BBC International, Inc.	Date and Hour	08/10/2016 @ 4:24 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 flow line caused a leak of 160 bbls of produced water. A vacuum truck recovered 120 bbls of a produced water and rain mixture and the line was put back in service.

Describe Area Affected and Cleanup Action Taken.*

The affected area is approximately 55' x 100' north of location in the pit area. Remediation will be completed in accordance with a remediation plan approved by both 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: Casey Summers	Approved by Environmental Specialist:		
Title: NM Environmental Advisor	Approval Date:	Expiration Date:	
E-mail Address: Casey_Summers@oxy.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 8-22-16	Phone: (575) 513-8289		

* 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
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 April 3, 2017

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 USA INC	Contact	WADE DITTRICH
Address	PO BOX 4294; HOUSTON, TX 77210	Telephone No.	575-390-2828
Facility Name	RUM RUNNER 2 FED COM #1 BATTERY	Facility Type	BATTERY
Surface Owner	BLM	Mineral Owner	BLM
		API No.	30-025-40095

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
H	2	22S	32E					

Latitude _32.42297_ Longitude _-103.63806_ NAD83

NATURE OF RELEASE

Type of Release	PRODUCED WATER MIXED WITH RAIN WATER	Volume of Release	160 BBLS	Volume Recovered	120 BBLS
Source of Release	CORROSION OF A 2" STEEL FLOW LINE	Date and Hour of Occurrence	8-10-16	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? JAMIE KEYES-NMOCD; KRISTEN LYNCH-NMOCD; SHELLY TUCKER-BLM			
By Whom?	KATHY @ BBC INTERNATIONAL, INC.	Date and Hour	8-10-16 @ 4:24PM		
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 flow line caused a leak of 160 bbls of produced water. A vacuum truck recovered 120 bbls of a produced water and rain mixture and the line was put back in service.

Describe Area Affected and Cleanup Action Taken.*

The affected area is approximately 55' x 100' north of location in the pit area. (measurements are subject to change with GPS tracking). Remediation was completed in accordance with the remediation plan approved by the 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: 	OIL CONSERVATION DIVISION		
Printed Name: WADE DITTRICH	Approved by Environmental Specialist: 		
Title: ENVIROMENTAL COORDINATOR	Approval Date: 10/25/2022	Expiration Date: Not applicable	
E-mail Address: wade_dittrich@oxy.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 10/16/17	Phone: 575-390-2828		

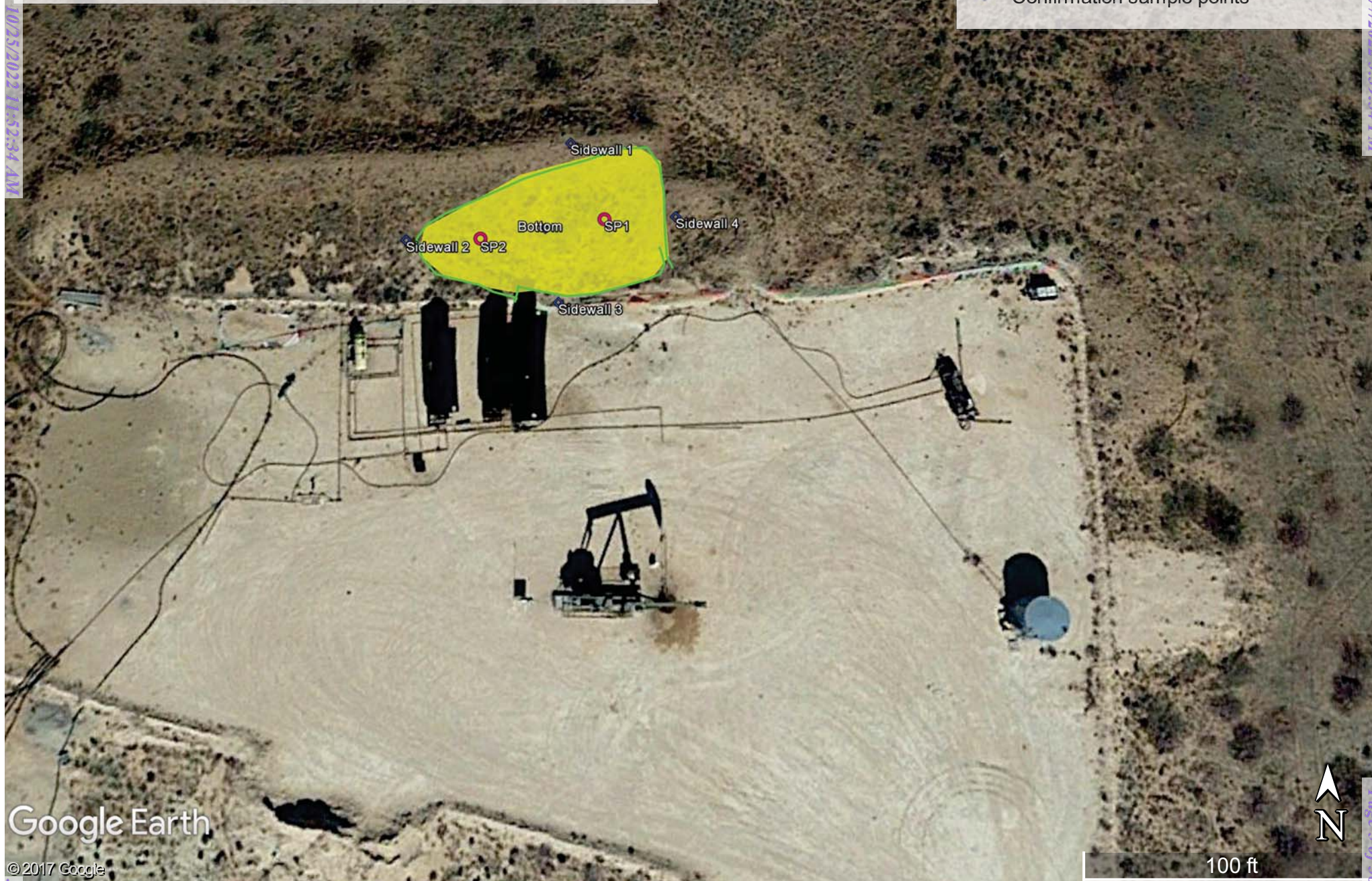
* Attach Additional Sheets If Necessary

Oxy, Rum Runner 2 Fed Com #1 Battery

Leak date: 08/10/2016
Lea County, NM
API# 30-025-40095
1RP-4411

Legend

- 6 in. surface scrape across entire area
- Leak Area
- Sample points
- Confirmation sample points



Oxy, Rum Runner 2 Fed Com #1 Battery

Sample points, hand auger

SP1, N 32.42300 W-103.63826

SP2, N 32.42302 W-103.63811

Confirmation sample points, hand auger

BOTTOM, N 32.42301 W-103.63818

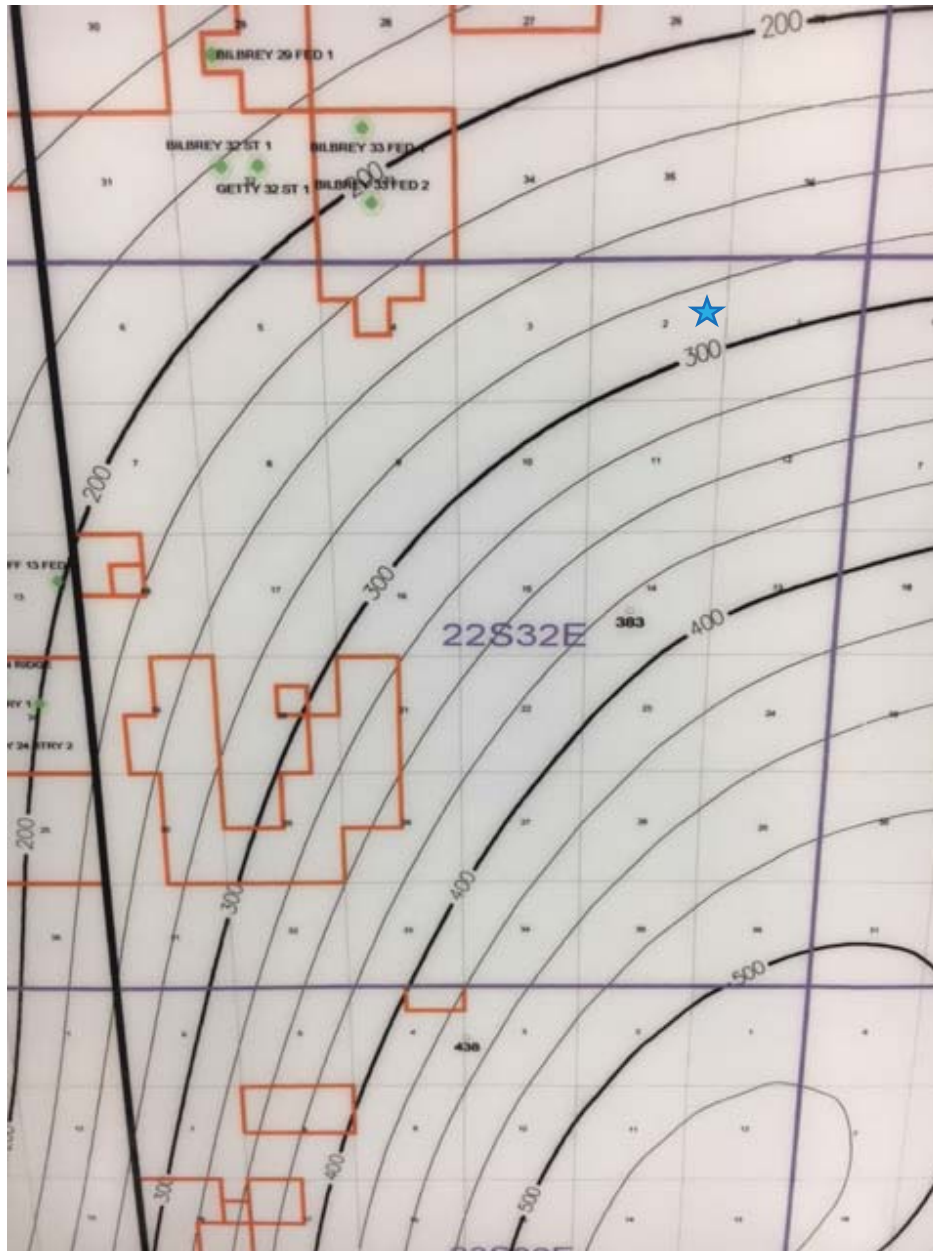
SIDEWALL 1, N 32.42311 W-103.63815

SIDEWALL 2, N 32.42300 W-103.63835

SIDEWALL 3, N 32.42293 W-103.63816

SIDEWALL 4, N 32.42303 W-103.63802

Oxy, Rum Runner 2 Fed Com #1 Btry
U/L H, Section 2, T22S, R32E
Groundwater: 275'-300'





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): 627959

Northing (Y): 3588097

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.

11/8/17 10:05 AM

WATER COLUMN/ AVERAGE
DEPTH TO WATER

Public Land Survey System (PLSS)

☐ Q64: Q16: Q4: Sec: Tws: Rng:

State Plane Coordinate System - NAD27

☐ X: ft Y: ft Zone:

State Plane Coordinate System - NAD83

☐ X: ft Y: ft Zone:

Degrees/Minutes/Seconds

☐ Longitude (X): Degrees: ° Minutes: ' Seconds: "

Latitude (Y): Degrees: ° Minutes: ' Seconds: "

UTM - NAD27

☐ Easting (X): mtrs Northing (Y): mtrs Zone:

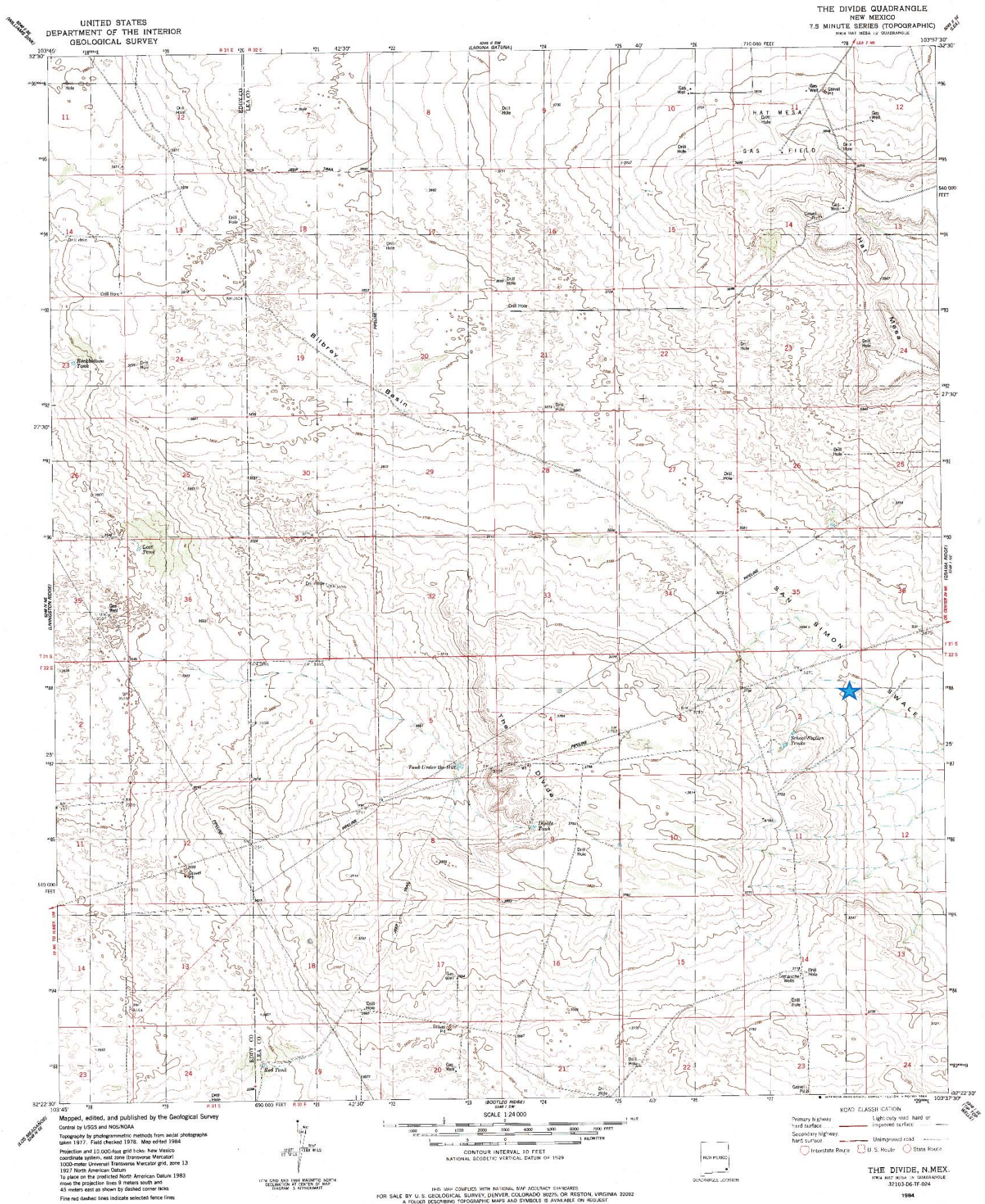
SUBMIT

All Conversion Results are displayed as **NAD 1983 UTM Zone 13**

Easting (X): mtrs Northing (Y): mtrs

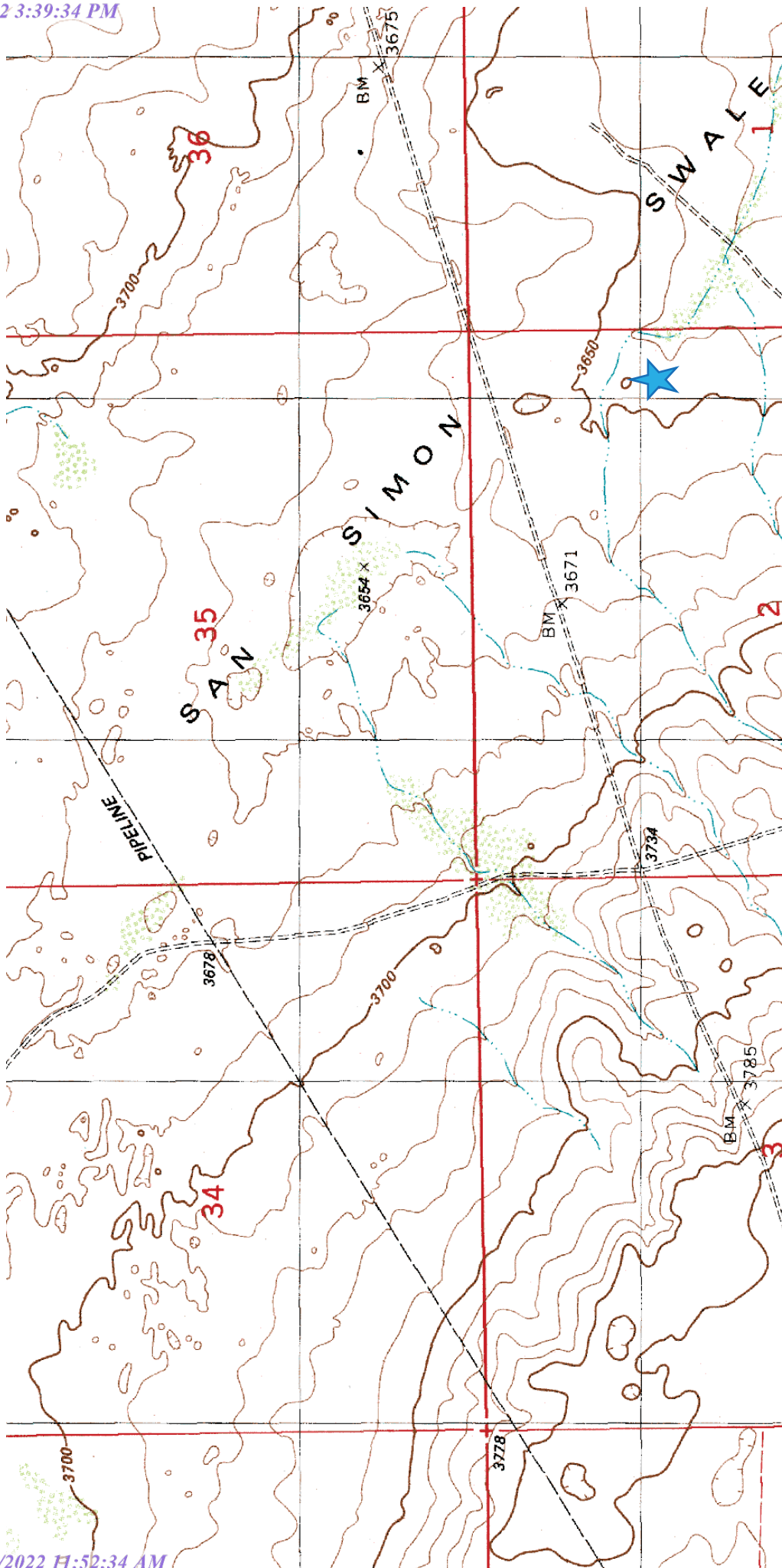
~~ Please keep screen open to copy UTM values for Reports. ~~

Rum Runner 2 Fed Com #1 Battery



Oxy

Rum Runner 2 Fed Com #1 Btry



Laboratory Analytical Results Summary
Rum Runner 2 Fed Com #1 Battery

		Sample	SP1 @ SURFACE	SP1 @ 1'	SP1 @ 2'	SP1 @ 3'
Analyte	Method	Date	9/27/16	9/27/16	9/27/16	9/27/16
			mg/Kg	mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.050	<0.050	N/A	N/A
Toluene	BTEX 8021B		<0.050	<0.050	N/A	N/A
Ethylbenzene	BTEX 8021B		<0.050	<0.050	N/A	N/A
Total Xylenes	BTEX 8021B		<0.150	<0.150	N/A	N/A
Total BTEX	BTEX 8021B		<0.300	<0.300	N/A	N/A
Chloride	SM4500Cl-B		80	<16.0	32	48
GRO	TPH 8015M		<10.0	<10.0	N/A	N/A
DRO	TPH 8015M		847	12.3	N/A	N/A

		Sample	SP2 @ SURFACE	SP2 @ 1'	SP2 @ 2'	SP2 @ 3'
Analyte	Method	Date	9/27/16	9/27/16	9/27/16	9/27/16
			mg/Kg	mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.050	<0.050	N/A	N/A
Toluene	BTEX 8021B		<0.050	<0.050	N/A	N/A
Ethylbenzene	BTEX 8021B		<0.050	<0.050	N/A	N/A
Total Xylenes	BTEX 8021B		<0.150	<0.150	N/A	N/A
Total BTEX	BTEX 8021B		<0.300	<0.300	N/A	N/A
Chloride	SM4500Cl-B		64	<16.0	64	48
GRO	TPH 8015M		<10.0	<10.0	N/A	N/A
DRO	TPH 8015M		1030	<10.0	N/A	N/A

Laboratory Analytical Results Summary
Rum Runner 2 Fed Com #1 Battery

Confirmation		Sample ID	Sidewall 1	Sidewall 2	Sidewall 3	Sidewall 4	Bottom
Analyte	Method	Date	11/2/17	11/2/17	11/2/17	11/2/17	11/2/17
			mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Benzene	BTEX 8021B		<0.050	<0.050	<0.050	<0.050	0.051
Toluene	BTEX 8021B		0.187	0.2	0.064	0.114	0.214
Ethylbenzene	BTEX 8021B		<0.050	<0.050	<0.050	<0.050	<0.050
Total Xylenes	BTEX 8021B		0.242	0.179	<0.150	<0.150	0.259
Total BTEX	BTEX 8021B		0.429	0.379	<0.300	<0.300	0.525
Chloride	SM4500Cl-B		32	32	48	32	16
GRO	TPH 8015M		<50.0	<50.0	<50.0	<50.0	<50.0
DRO	TPH 8015M		<50.0	<50.0	<50.0	<50.0	<50.0
EXT DRO	TPH 8015M		<50.0	<50.0	<50.0	<50.0	<50.0



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

October 01, 2016

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: RUM RUNNER #2 FED COM #1

Enclosed are the results of analyses for samples received by the laboratory on 09/28/16 11:48.

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

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

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

Received:	09/28/2016	Sampling Date:	09/27/2016
Reported:	10/01/2016	Sampling Type:	Soil
Project Name:	RUM RUNNER #2 FED COM #1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	MILLS RANCH		

Sample ID: SP 1 @ SURFACE (H602176-01)

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	09/29/2016	ND	2.09	104	2.00	0.598	
Toluene*	<0.050	0.050	09/29/2016	ND	2.13	106	2.00	0.937	
Ethylbenzene*	<0.050	0.050	09/29/2016	ND	2.08	104	2.00	1.22	
Total Xylenes*	<0.150	0.150	09/29/2016	ND	6.29	105	6.00	1.76	
Total BTEX	<0.300	0.300	09/29/2016	ND					

Surrogate: 4-Bromofluorobenzene (PID) 98.4 % 73.6-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	80.0	16.0	09/30/2016	ND	416	104	400	3.92		

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	09/29/2016	ND	176	88.0	200	3.34	
DRO >C10-C28	847	10.0	09/29/2016	ND	189	94.5	200	4.28	

Surrogate: 1-Chlorooctane 99.0 % 35-147

Surrogate: 1-Chlorooctadecane 138 % 28-171

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received:	09/28/2016	Sampling Date:	09/27/2016
Reported:	10/01/2016	Sampling Type:	Soil
Project Name:	RUM RUNNER #2 FED COM #1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	MILLS RANCH		

Sample ID: SP 1 @ 1' (H602176-02)

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	09/29/2016	ND	2.09	104	2.00	0.598		
Toluene*	<0.050	0.050	09/29/2016	ND	2.13	106	2.00	0.937		
Ethylbenzene*	<0.050	0.050	09/29/2016	ND	2.08	104	2.00	1.22		
Total Xylenes*	<0.150	0.150	09/29/2016	ND	6.29	105	6.00	1.76		
Total BTEx	<0.300	0.300	09/29/2016	ND						

Surrogate: 4-Bromofluorobenzene (PID) 97.0 % 73.6-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	09/30/2016	ND	416	104	400	3.92		

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	09/29/2016	ND	176	88.0	200	3.34	
DRO >C10-C28	12.3	10.0	09/29/2016	ND	189	94.5	200	4.28	

Surrogate: 1-Chlorooctane 90.6 % 35-147

Surrogate: 1-Chlorooctadecane 104 % 28-171

Sample ID: SP 1 @ 2' (H602176-03)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	09/30/2016	ND	416	104	400	3.92		

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received:	09/28/2016	Sampling Date:	09/27/2016
Reported:	10/01/2016	Sampling Type:	Soil
Project Name:	RUM RUNNER #2 FED COM #1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	MILLS RANCH		

Sample ID: SP 1 @ 3' (H602176-04)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	09/30/2016	ND	416	104	400	3.92		

Sample ID: SP 2 @ SURFACE (H602176-05)

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	09/29/2016	ND	2.09	104	2.00	0.598	
Toluene*	<0.050	0.050	09/29/2016	ND	2.13	106	2.00	0.937	
Ethylbenzene*	<0.050	0.050	09/29/2016	ND	2.08	104	2.00	1.22	
Total Xylenes*	<0.150	0.150	09/29/2016	ND	6.29	105	6.00	1.76	
Total BTEX	<0.300	0.300	09/29/2016	ND					

Surrogate: 4-Bromofluorobenzene (PID) 95.8 % 73.6-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	64.0	16.0	09/30/2016	ND	416	104	400	3.92		

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	09/29/2016	ND	176	88.0	200	3.34	
DRO >C10-C28	1030	10.0	09/29/2016	ND	189	94.5	200	4.28	

Surrogate: 1-Chlorooctane 67.8 % 35-147

Surrogate: 1-Chlorooctadecane 96.9 % 28-171

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

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

Received:	09/28/2016	Sampling Date:	09/27/2016
Reported:	10/01/2016	Sampling Type:	Soil
Project Name:	RUM RUNNER #2 FED COM #1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	MILLS RANCH		

Sample ID: SP 2 @ 1' (H602176-06)

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	09/29/2016	ND	2.09	104	2.00	0.598		
Toluene*	<0.050	0.050	09/29/2016	ND	2.13	106	2.00	0.937		
Ethylbenzene*	<0.050	0.050	09/29/2016	ND	2.08	104	2.00	1.22		
Total Xylenes*	<0.150	0.150	09/29/2016	ND	6.29	105	6.00	1.76		
Total BTX	<0.300	0.300	09/29/2016	ND						

Surrogate: 4-Bromofluorobenzene (PID) 96.9 % 73.6-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	09/30/2016	ND	416	104	400	3.92		

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	09/29/2016	ND	176	88.0	200	3.34	
DRO >C10-C28	<10.0	10.0	09/29/2016	ND	189	94.5	200	4.28	

Surrogate: 1-Chlorooctane 85.1 % 35-147

Surrogate: 1-Chlorooctadecane 96.9 % 28-171

Sample ID: SP 2 @ 2' (H602176-07)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	64.0	16.0	09/30/2016	ND	416	104	400	3.92		

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received:	09/28/2016	Sampling Date:	09/27/2016
Reported:	10/01/2016	Sampling Type:	Soil
Project Name:	RUM RUNNER #2 FED COM #1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	MILLS RANCH		

Sample ID: SP 2 @ 3' (H602176-08)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	09/30/2016	ND	416	104	400	3.92		

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Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

QR-02	The RPD result exceeded the QC control limits; however, both percent recoveries were acceptable. Sample results for the QC batch were accepted based on percent recoveries and completeness of QC data.
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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A handwritten signature in black ink, appearing to read "Caley D. Keene".

Caley D. Keene, Lab Director/Quality Manager



ARDINAL 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.

Project Manager: Cliff Brunson

Address: P.O. Box 805

City: Hobbs

Phone #: 575-397-6388

Project #:

Project Name:

Project Location:

Sampler Name:

P.O. #:

Company:

Attn:

Address:

City:

State:

Phone #:

Fax #:

BILL TO

ANALYSIS REQUEST

FOR LAB USE ONLY

Lab I.D.

Sample I.D.

11002176

SP1054

SP2054

SP2054

SP2054

(G)RAB OR (C)OMP.

CONTAINERS

GROUNDWATER

WASTEWATER

SOIL

OIL

SLUDGE

OTHER :

ACID/BASE:

ICE / COOL

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Relinquished By:

UPC One by

Date: 9-18-11

Time: 11:18

Received By:

UPC One by

Date: 9-18-11

Time: 11:18

Received By:

UPC One by

Date: 9-18-11

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Received By:

UPC One by

Date: 9-18-11

Time: 11:18

Received By:

UPC One by

Date: 9-18-11

Time: 11:18

Received By:

UPC One by



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

November 14, 2017

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: RUM RUNNER #2 FED COM #1

Enclosed are the results of analyses for samples received by the laboratory on 11/03/17 16:00.

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

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

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



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

Analytical Results For:

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

Received:	11/03/2017	Sampling Date:	11/02/2017
Reported:	11/14/2017	Sampling Type:	Soil
Project Name:	RUM RUNNER #2 FED COM #1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	MILLS RANCH		

Sample ID: SIDEWALL 1 (H703044-01)

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	11/10/2017	ND	2.02	101	2.00	0.921	
Toluene*	0.187	0.050	11/10/2017	ND	1.97	98.7	2.00	0.0233	
Ethylbenzene*	<0.050	0.050	11/10/2017	ND	1.93	96.5	2.00	0.167	
Total Xylenes*	0.242	0.150	11/10/2017	ND	6.09	101	6.00	0.276	
Total BTX	0.429	0.300	11/10/2017	ND					

Surrogate: 4-Bromofluorobenzene (PID) 110 % 72-148

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	11/06/2017	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	<50.0	50.0	11/09/2017	ND	159	79.5	200	23.1	
DRO >C10-C28	<50.0	50.0	11/09/2017	ND	203	102	200	2.28	
EXT DRO >C28-C36	<50.0	50.0	11/09/2017	ND					

Surrogate: 1-Chlorooctane 85.2 % 28.3-164

Surrogate: 1-Chlorooctadecane 81.7 % 34.7-157

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received:	11/03/2017	Sampling Date:	11/02/2017
Reported:	11/14/2017	Sampling Type:	Soil
Project Name:	RUM RUNNER #2 FED COM #1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	MILLS RANCH		

Sample ID: SIDEWALL 2 (H703044-02)

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	11/10/2017	ND	2.02	101	2.00	0.921		
Toluene*	0.200	0.050	11/10/2017	ND	1.97	98.7	2.00	0.0233		
Ethylbenzene*	<0.050	0.050	11/10/2017	ND	1.93	96.5	2.00	0.167		
Total Xylenes*	0.179	0.150	11/10/2017	ND	6.09	101	6.00	0.276		
Total BTEX	0.379	0.300	11/10/2017	ND						

Surrogate: 4-Bromofluorobenzene (PID) 106 % 72-148

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	11/06/2017	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	<50.0	50.0	11/09/2017	ND	159	79.5	200	23.1	
DRO >C10-C28	<50.0	50.0	11/09/2017	ND	203	102	200	2.28	
EXT DRO >C28-C36	<50.0	50.0	11/09/2017	ND					

Surrogate: 1-Chlorooctane 86.7 % 28.3-164

Surrogate: 1-Chlorooctadecane 82.6 % 34.7-157

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received:	11/03/2017	Sampling Date:	11/02/2017
Reported:	11/14/2017	Sampling Type:	Soil
Project Name:	RUM RUNNER #2 FED COM #1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	MILLS RANCH		

Sample ID: SIDEWALL 3 (H703044-03)

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	11/10/2017	ND	2.02	101	2.00	0.921		
Toluene*	0.064	0.050	11/10/2017	ND	1.97	98.7	2.00	0.0233		
Ethylbenzene*	<0.050	0.050	11/10/2017	ND	1.93	96.5	2.00	0.167		
Total Xylenes*	<0.150	0.150	11/10/2017	ND	6.09	101	6.00	0.276		
Total BTEx	<0.300	0.300	11/10/2017	ND						

Surrogate: 4-Bromofluorobenzene (PID) 109 % 72-148

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	11/06/2017	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	<50.0	50.0	11/10/2017	ND	159	79.5	200	23.1	
DRO >C10-C28	<50.0	50.0	11/10/2017	ND	203	102	200	2.28	
EXT DRO >C28-C36	<50.0	50.0	11/10/2017	ND					

Surrogate: 1-Chlorooctane 88.1 % 28.3-164

Surrogate: 1-Chlorooctadecane 84.1 % 34.7-157

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received:	11/03/2017	Sampling Date:	11/02/2017
Reported:	11/14/2017	Sampling Type:	Soil
Project Name:	RUM RUNNER #2 FED COM #1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	MILLS RANCH		

Sample ID: SIDEWALL 4 (H703044-04)

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	11/10/2017	ND	2.02	101	2.00	0.921		
Toluene*	0.114	0.050	11/10/2017	ND	1.97	98.7	2.00	0.0233		
Ethylbenzene*	<0.050	0.050	11/10/2017	ND	1.93	96.5	2.00	0.167		
Total Xylenes*	<0.150	0.150	11/10/2017	ND	6.09	101	6.00	0.276		
Total BTEx	<0.300	0.300	11/10/2017	ND						

Surrogate: 4-Bromofluorobenzene (PID) 111 % 72-148

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	11/06/2017	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	<50.0	50.0	11/10/2017	ND	159	79.5	200	23.1	
DRO >C10-C28	<50.0	50.0	11/10/2017	ND	203	102	200	2.28	
EXT DRO >C28-C36	<50.0	50.0	11/10/2017	ND					

Surrogate: 1-Chlorooctane 91.4 % 28.3-164

Surrogate: 1-Chlorooctadecane 88.2 % 34.7-157

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

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

Received:	11/03/2017	Sampling Date:	11/02/2017
Reported:	11/14/2017	Sampling Type:	Soil
Project Name:	RUM RUNNER #2 FED COM #1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	MILLS RANCH		

Sample ID: BOTTOM (H703044-05)

BTEx 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	0.051	0.050	11/10/2017	ND	2.02	101	2.00	0.921	
Toluene*	0.214	0.050	11/10/2017	ND	1.97	98.7	2.00	0.0233	
Ethylbenzene*	<0.050	0.050	11/10/2017	ND	1.93	96.5	2.00	0.167	
Total Xylenes*	0.259	0.150	11/10/2017	ND	6.09	101	6.00	0.276	
Total BTEX	0.525	0.300	11/10/2017	ND					

Surrogate: 4-Bromofluorobenzene (PID) 114 % 72-148

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	11/06/2017	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	<50.0	50.0	11/13/2017	ND	186	93.0	200	0.457	
DRO >C10-C28	<50.0	50.0	11/13/2017	ND	187	93.4	200	0.0749	
EXT DRO >C28-C36	<50.0	50.0	11/13/2017	ND					

Surrogate: 1-Chlorooctane 101 % 28.3-164

Surrogate: 1-Chlorooctadecane 87.4 % 34.7-157

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Celey D. Keene, Lab Director/Quality Manager

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

Notes and Definitions

QR-02	The RPD result exceeded the QC control limits; however, both percent recoveries were acceptable. Sample results for the QC batch were accepted based on percent recoveries and completeness of QC data.
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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A handwritten signature in black ink, appearing to read "Caley D. Keene", is written over a horizontal line.

Caley D. Keene, Lab Director/Quality Manager



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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

From: Yu, Olivia, EMNRD
To: Casey_Summers@oxy.com
Cc: cbrunson@bbcinternational.com; kswinney@bbcinternational.com; kathy@bbcinternational.com; Jennifer_Hudgens@oxy.com; jgilkey@bbcinternational.com
Subject: RE: FW: OXY - Rum Runner 2 Fed Com #1 Battery - Remediation Plan
Date: Friday, June 2, 2017 2:20:25 PM
Attachments: [approved 1RP4411 Remediation Packet, Rum Runner 2 Fed Com #1 Battery.pdf](#)

Dear Casey:

NMOCD approves the delineation and proposed remediation plan for 1RP-4411 with one condition: provide bottom and sidewall confirmation samples. Please confirm.

Also, please include documentation of BLM approval in the closure report.

Thanks,
Olivia

From: Casey_Summers@oxy.com [mailto:Casey_Summers@oxy.com]
Sent: Wednesday, May 10, 2017 7:31 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: cbrunson@bbcinternational.com; kswinney@bbcinternational.com; kathy@bbcinternational.com; Jennifer_Hudgens@oxy.com; jgilkey@bbcinternational.com
Subject: FW: FW: OXY - Rum Runner 2 Fed Com #1 Battery - Remediation Plan

Olivia,
Can you take a look at the attached and below? This is a plan that got lost in the mix of NMOCD personnel changes. Delineation does not meet the COA but that is because it was completed in September of last year. BLM approved of the plan in December so we are good to go there.

Thanks and I believe I have one more similar to this that I may also be sending today.

Casey Summers
O: (575)-628-4152
C: (575)-513-8289

From: Cliff Brunson [mailto:cbrunson@bbcinternational.com]
Sent: Tuesday, November 01, 2016 12:03 PM
To: Kristen Lynch <Kristen.Lynch@state.nm.us>
Cc: Casey Summers <Casey_Summers@oxy.com>; Ken Swinney <kswinney@bbcinternational.com>; Jennifer Gilkey <jgilkey@bbcinternational.com>; Kathy Purvis <kathy@bbcinternational.com>; jennifer_duarte@oxy.com
Subject: OXY - Rum Runner 2 Fed Com #1 Battery - Remediation Plan

Kristen,

This e-mail is to confirm our discussion concerning the remediation plan for the OXY Rum Runner 2 Fed Com #1 Battery release. 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:
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Phone: (575) 397-6388
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E-Mail: cbrunson@bbcinternational.com



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From: Tucker, Shelly
To: [Cliff Brunson](#)
Cc: [Casey Summers](#); jennifer_duarte@oxy.com; [Ken Swinney](#); [Jennifer Gilkey](#); [Kathy Purvis](#)
Subject: Re: OXY - Rum Runner 2 Fed Com #1 Battery - Remediation Plan
Date: Thursday, November 3, 2016 1:39:19 PM

Cliff,

BLM accepts and approves your proposed remediation plan.

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

Sincerely,

Shelly J Tucker

Environmental Protection Specialist
O&G Spill/Release Coordinator

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

575.234.5905 - Direct
575.361.0084 - Cellular
575.234.6235 - Emergency Spill Number

stucker@blm.gov

The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

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On Wed, Nov 2, 2016 at 4:30 PM, Cliff Brunson <cbrunson@bbcinternational.com> wrote:

Shelly,

I have attached a remediation plan for the Oxy Rum Runner 2 Fed Com #1 Battery release. This plan has been approved by Jamie Keyes of the NMOCD. Oxy is requesting the BLM's approval of this plan as well. Upon your review of the materials, it would be appreciated if you would respond via email with the BLM's approval.

If you have any questions, please let me know.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS

President

BBC International, Inc.

World-Wide Environmental Specialists

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Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 149672

CONDITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 149672
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
bhall	None	10/25/2022