



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

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January 6, 2012

Mr. Geoffrey Leking  
New Mexico Oil Conservation Division  
1625 N. French Drive  
Hobbs, NM 88240

Re: Oxy Final C-141 Information Packets: Red Tank 28 #3 Battery, Cotton Draw Unit #12

Dear Mr. Leking:

On behalf of Oxy USA, BBC International, Inc. is pleased to enclose the Final C-141 closure information packets for the above referenced sites for your records. These packets included initial and final C-141s, site diagrams, laboratory analyses, and correspondence pertaining to the sites.

Please let us know if you require any additional information.

Sincerely,

Cliff P. Brunson  
President

CPB/kp

Enclosures

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, 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 October 10, 2003

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

### Release Notification and Corrective Action

#### OPERATOR

☐ Initial Report ☒ Final Report

Name of Company	Oxy USA WTP	Contact	Dusty Wilson
Address	1017 W. Stanolind Rd, Hobbs NM	Telephone No.	(575) 397-8247
Facility Name	Cotton Draw Unit #12	Facility Type	Well Site
Surface Owner	BLM	Mineral Owner	Oxy/BLM
		Lease No.	30-025-08190

#### LOCATION OF RELEASE API #30-015-28305

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
E	15	25S	32E					Lea

Latitude \_\_\_\_\_ Longitude \_\_\_\_\_

#### NATURE OF RELEASE

Type of Release	Produced water	Volume of Release	100 bw	Volume Recovered	0 bw
Source of Release	Flow Line	Date and Hour of Occurrence	02/17/2010 @ 6:00pm	Date and Hour of Discovery:	Same
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?			
		Jeff Leking (NMOCD) and Trish Badbear (BLM)			
By Whom?	Dusty Wilson- Oxy	Date and Hour	02/18/2010 @ 4:00pm		
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.			
		N/A			

If a Watercourse was Impacted, Describe Fully.\*  
N/A

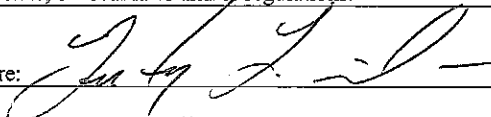
Describe Cause of Problem and Remedial Action Taken.\*

Flow line leak due to internal corrosion. Remediation complete as described in the OCD and BLM approved remediation plans.

Describe Area Affected and Cleanup Action Taken.\*

Clean up was performed by excavating the impacted soil and backfilling the site with clean soil. Soil borings were performed and results were provided to the BLM and NMOCD. Closure was granted on 08/25/2011 by the BLM. Remediation approval was granted by the NMOCD on 04/21/2011.

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

Signature: 	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Dusty Wilson	Approved by District Supervisor: Jocelyn Harimon	
Title: HES Specialist	Approval Date: 04/06/2023	Expiration Date:
E-mail Address: Dusty_Wilson@oxy.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 12-19-2011 Phone: (575) 397-8210	None	

\* Attach Additional Sheets If Necessary

## Kathy Purvis

---

**From:** Cliff P. Brunson <cbrunson@bbcinternational.com>  
**Sent:** Wednesday, October 12, 2011 1:30 PM  
**To:** Trishia Bad Bear; scaffey@blm.gov  
**Cc:** Dusty Wilson; C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** FW: Oxy-Cotton Draw

Ms. Bad Bear,

This message is to inform you that BBC International will begin the approved remediation work plan for the Oxy Cotton Draw 12 on Friday, October 14, 2011 at approximately 9:00 a.m. If you have any questions, please let us know.

Thank you,

Cliff

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

\*\*\*\*\*

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>

>-----Original Message-----

>From: tbadbear@blm.gov [mailto:tbadbear@blm.gov]

>Sent: Thursday, August 25, 2011 3:50 PM

>To: Wilson, Dusty L

>Subject: Re: FW: Oxy-Cotton Draw

>  
>Mr. Wilson,  
>  
>Upon reviewing OXY-Cotton Draw 12 work plan:  
>  
>BLM concurs with NMOCD.  
>  
>- Reseed excavated sited with seed mixture 2/LPC.  
>  
>Contact Trishia Bad Bear in the Hobbs Field Station - BLM, 48-hours  
>prior to excavation.  
>  
>Thank you,  
>  
>Trishia C. Bad Bear  
>Natural Resource Specialist  
>BLM-Hobbs Field Station  
>575.393.3612 office  
>575.390.2258 cell  
>575.393.4280 fax  
>Trishia\_Bad\_Bear@nm.blm.gov  
>  
>  
>  
>  
>  
>  
> <Dusty\_Wilson@oxy  
>  
> .com>  
>  
>  
>To  
> 08/23/2011 05:16 <tbadbear@blm.gov>,  
>  
> PM <scaffey@blm.gov>  
>  
>  
>cc  
> <cbrunson@bbcinternational.com>,  
>  
> <Chancey\_Summers@oxy.com>,  
>  
> <kswinney@bbcinternational.com>  
>  
>  
>Subject  
> FW: Oxy-Cotton Draw  
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>

>Ms. Badbear, I have not heard anything back from you on this site sent  
>to you on June 9th 2011.

>

>Can you please review? We are still asking for like kind approval as to  
>the previous approval given by NMOCD. Thank you for your attention on  
>this matter.

>

>Thanks,

>Dusty L. Wilson

>HES Specialist

>Seminole, Lea County RMT.

>"You will never succeed, if not given the chance to fail."

>From: Wilson, Dusty L

>Sent: Thursday, June 09, 2011 3:30 PM

>To: Trishia\_Bad\_Bear@nm.blm.gov

>Cc: scaffey@blm.gov

>Subject: FW: Oxy-Cotton Draw

>

>Ms. Badbear, The note below from NMOCD, Jeff Leking, shows an approved  
>work plan to move forward at the Cotton Draw # 12 spill site. Oxy is  
>requesting that BLM provide like kind approval as to the NMOCD approved  
>work plan, as they have agreed that this work plan does comply with all  
>NMOCD spill guideline reclamation requirements. Oxy will be waiting  
>before moving forward with the NMOCD work plan to make sure ample time  
>is provided to the BLM for review. As always, Oxy is willing to work  
>with any and all regulators to insure that all written guidelines are  
>adhered to. If something is missing or has not been addressed in the  
>previously mentioned work plan, we are willing to discuss any changes,  
>to insure the adherence to written State and Federal requirements. I am  
>also providing for BLM review, the site diagram, and lab data gathered,  
>and previously provided to NMOCD, from this site. Thank you for your  
>attention on this matter.

>

>

>Thanks,

>

>

>Dusty L. Wilson

>HES Specialist

>Seminole, Lea County RMT.

>  
>  
>"You will never succeed, if not given the chance to fail."  
>  
>  
>  
>From: Leking, Geoffrey R, EMNRD [mailto:GeoffreyR.Leking@state.nm.us]  
>Sent: Thursday, April 21, 2011 9:02 AM  
>To: Cliff P. Brunson  
>Cc: Wilson, Dusty L; Ken Swinney; Jennifer Gilkey;  
>Trishia\_Bad\_Bear@nm.blm.gov  
>Subject: RE: Oxy-Cotton Draw  
>Cliff  
>  
>The OCD verifies its agreement with the path forward as discussed in  
>the email below and as previously agreed upon at the meeting of Monday April  
>18, 2011. Please proceed upon receiving concurrence from the BLM.  
>  
>Please ignore the prior OCD email that erroneously stated the date of  
>the meeting as being Tuesday April 19, 2011.  
>  
>Geoffrey Leking  
>Environmental Engineer  
>NMOCD-Hobbs  
>1625 N. French Drive  
>Hobbs, NM 88240  
>Office: (575) 393-6161 Ext. 113  
>Cell: (575) 399-2990  
>email: geoffreyr.leking@state.nm.us  
>  
>  
>From: Cliff P. Brunson [mailto:cbrunson@bbcinternational.com]  
>Sent: Tuesday, April 19, 2011 4:51 PM  
>To: Leking, Geoffrey R, EMNRD  
>Cc: Dusty Wilson; Ken Swinney; Jennifer Gilkey  
>Subject: Oxy-Cotton Draw  
>  
>Geoff,  
>  
>This e-mail is to confirm our conversation yesterday morning with  
>myself and Dusty Wilson concerning the remediation plan and path  
>forward for the above mentioned site. As discussed, Oxy will excavate 3  
>feet of impacted soil across the site. A plastic liner will be installed across the site.  
>The site will then be backfilled with clean backfill soil. I have  
>attached the site diagram and lab data that we reviewed for your files.  
>  
>If you would please reply back via e-mail with your concurrence, it  
>would be greatly appreciated. Let me know if you have any questions.  
>  
>Thanks, Cliff  
>  
>

>  
>Cliff 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) 387-6388  
>Fax: (575) 397-0397  
>E-Mail: cbrunson@bbcinternational.com  
>\*\*\*\*\*  
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>recipient(s) is strictly prohibited.  
>\*\*\*\*\*[attachment "Oxy-Cotton  
>Draw.pdf" deleted by Trishia Bad Bear/HFS/NM/BLM/DOI] [attachment  
>"img-421134834-0001.pdf" deleted by Trishia Bad Bear/HFS/NM/BLM/DOI]  
>  
>

04/23/2010 14:29

5753932475

CARDINAL LABS

PAGE 01/03

**ARDINAL  
LABORATORIES**

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

April 23, 2010

Cliff Brunson  
BBC International, Inc.  
P.O. Box 805  
Hobbs, NM 88241

Re: Cotton Draw (Oxy)

Enclosed are the results of analyses for sample number H19726, received by the laboratory on 04/21/10 at 5:02 pm.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method SW-846 8260	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method TX 1005	Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

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 524.2	Regulated VOCs (V2, V3)

Accreditation applies to public drinking water matrices.

Total Number of Pages of Report: 3 (includes Chain of Custody)

Sincerely,

Celey D. Keene  
Laboratory Director

---

This report conforms with NELAP requirements.



**CARDINAL  
LABORATORIES**

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

ANALYTICAL RESULTS FOR  
BBC INTERNATIONAL, INC.  
ATTN: CLIFF BRUNSON  
P.O. BOX 805  
HOBBS, NM 88241  
FAX TO: (575) 397-0397


Receiving Date: 04/21/10  
Reporting Date: 04/22/10  
Project Owner: OXY  
Project Name: COTTON DRAW  
Project Location: JAL, NM

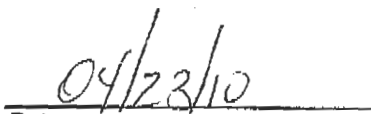
Analysis Date: 04/22/10  
Sampling Date: 04/20/10  
Sample Type: SOIL  
Sample Condition: COOL & INTACT @ 6°C  
Sample Received By: JH  
Analyzed By: HM

LAB NUMBER	SAMPLE ID	Cl <sup>-</sup> (mg/kg)
H19726-1	SB1 @ 15'	4,980
H19726-2	SB1 @ 20'	688
H19726-3	SB1 @ 25'	352
H19726-4	SB1 @ 30'	192
H19726-5	SB1 @ 35'	128
H19726-6	SB2 @ 15'	6,160
H19726-7	SB2 @ 35'	5,100
H19726-8	SB2 @ 40'	640
H19726-9	SB2 @ 50'	112
Quality Control		500
True Value QC		500
% Recovery		100
Relative Percent Difference		< 0.1

METHOD: Standard Methods	4500-ClB
--------------------------	----------

Note: Analyses performed on 1:4 w:v aqueous extracts.

  
Chemist

  
Date

H19726 BBC

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 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.

04/23/2010 14:29

5753932476

CARDINAL LABS

PAGE 03/03



## CARDINAL LABORATORIES

101 East Maryland, 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												ANALYSIS REQUEST																											
Project Manager: Cliff Brunson		City: Hobbs		State: NM		Zip: 88241		Company:																																			
Address: P.O. Box 805		Phone #: 575-397-6388		Fax #: 575-397-0397		Project Owner: Oxy		City:		State:		Zip:																															
Project Name: Cotton Draw		Project Location: Jal, NM		Sample Name: Joel Clouse		Fax #:		PRESERV:		SAMPLING																																	
POST-USE ONLY		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													
H19726-1		SB1 @ 15'		G /		1		✓		✓		✓		✓		✓		✓		✓		✓		✓		✓		4-20-10		11:50		Chloride											
2		SB1 @ 20'		G /		1		✓		✓		✓		✓		✓		✓		✓		✓		✓		✓		4-20-10		11:52													
3		SB1 @ 25'		G /		1		✓		✓		✓		✓		✓		✓		✓		✓		✓		✓		4-20-10		11:54													
4		SB1 @ 30'		G /		1		✓		✓		✓		✓		✓		✓		✓		✓		✓		✓		4-20-10		12:00													
5		SB1 @ 35'		G /		1		✓		✓		✓		✓		✓		✓		✓		✓		✓		✓		4-20-10		12:08													
6		SB2 @ 15'		G /		1		✓		✓		✓		✓		✓		✓		✓		✓		✓		✓		4-20-10		12:27													
7		SB2 @ 35'		G /		1		✓		✓		✓		✓		✓		✓		✓		✓		✓		✓		4-20-10		12:50													
8		SB2 @ 40'		G /		1		✓		✓		✓		✓		✓		✓		✓		✓		✓		✓		4-20-10		12:52													
9		SB2 @ 50'		G /		1		✓		✓		✓		✓		✓		✓		✓		✓		✓		✓		4-20-10		1:11													

PLEASE NOTE: Laboratory personnel must verify that the sample is properly labeled and that the container is properly sealed. The sample must be analyzed within 30 days of collection. If the sample is not analyzed within 30 days, the sample must be resealed and the analysis must be repeated. The sample must be analyzed within 30 days of collection. If the sample is not analyzed within 30 days, the sample must be resealed and the analysis must be repeated. The sample must be analyzed within 30 days of collection. If the sample is not analyzed within 30 days, the sample must be resealed and the analysis must be repeated.

Relinquished By: *Joel Clouse* Date: *4/23/10* Time: *4:51* Received By: *Joel Clouse* Date: *4/23/10* Time: *4:51*

Delivered By: (Circle One) *Joel Clouse* Sample Condition: *Good* Checked By: *Joel Clouse*

Sampler - UPS - Bus - Other: *UPS*

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

#46



**Oxy**  
Cotton Draw Leak

189' x 84'

Road

SP2

N 32.13187, W -103.66569

SP3

N 32.13184, W -103.66545

SB1 approx.  
location

SB2 approx.  
location

Flowline

SP1

N 32.13174, W -103.66585

**BBC International, Inc.**

**Oxy 2010**

Cotton Draw Leak

Date: 9/12/11

DRWG by: KAP

Disk:

Sheet 1 of 1

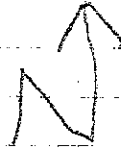
Scale: Not to Scale

File Name: DRWG

UL/Qtr Sec D, Sec 15, T 25S, R 32E

oxy cotton DCAW

cotton DCAW leak



189X84

road

Flow line

N 32.13187  
W 103.66569

SP2

SP3

N 32.13184  
W 103.66545

N 32.13187

W. 103.66569

Sec 15, T25S R32E  
9w travel map  
275-300'

SP1 N 32.13174  
W 103.66585

**District I**  
1625 N. French Dr., Hobbs, NM 88240  
Phone:(575) 393-6161 Fax:(575) 393-0720  
**District II**  
811 S. First St., Artesia, NM 88210  
Phone:(575) 748-1283 Fax:(575) 748-9720  
**District III**  
1000 Rio Brazos Rd., Aztec, NM 87410  
Phone:(505) 334-6178 Fax:(505) 334-6170  
**District IV**  
1220 S. St Francis Dr., Santa Fe, NM 87505  
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 194811

CONDITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 194811
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
jharimon	None	4/6/2023