

**Bratcher, Mike, EMNRD**

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**From:** Cliff P. Brunson <cbrunson@bbcinternational.com>  
**Sent:** Wednesday, April 03, 2013 3:39 PM  
**To:** Bratcher, Mike, EMNRD  
**Cc:** Chris Jones; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** Oxy-Unreported Leak (6/6/12) at Nagooltee Peak 5 #1-Remediation Plan  
**Attachments:** Remediation Packet- UL 6-6-12.pdf

Mike,

This e-mail is to confirm our discussion on March 25, 2013 concerning the remediation plan for the release that occurred at the Oxy Unreported Leak (6/6/12) at Nagooltee Peak 5 #1. I have attached the site drawing and the summary of the laboratory data we reviewed during our discussion for your files. As agreed, Oxy will excavate one foot across the entire leak area at the site dependent upon ground hardness. The site will then be backfilled with clean soil. The depth to groundwater in this area is approximately 25 feet.

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

Oxy and I thank you for your assistance in handling this matter.

Thanks, Cliff

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

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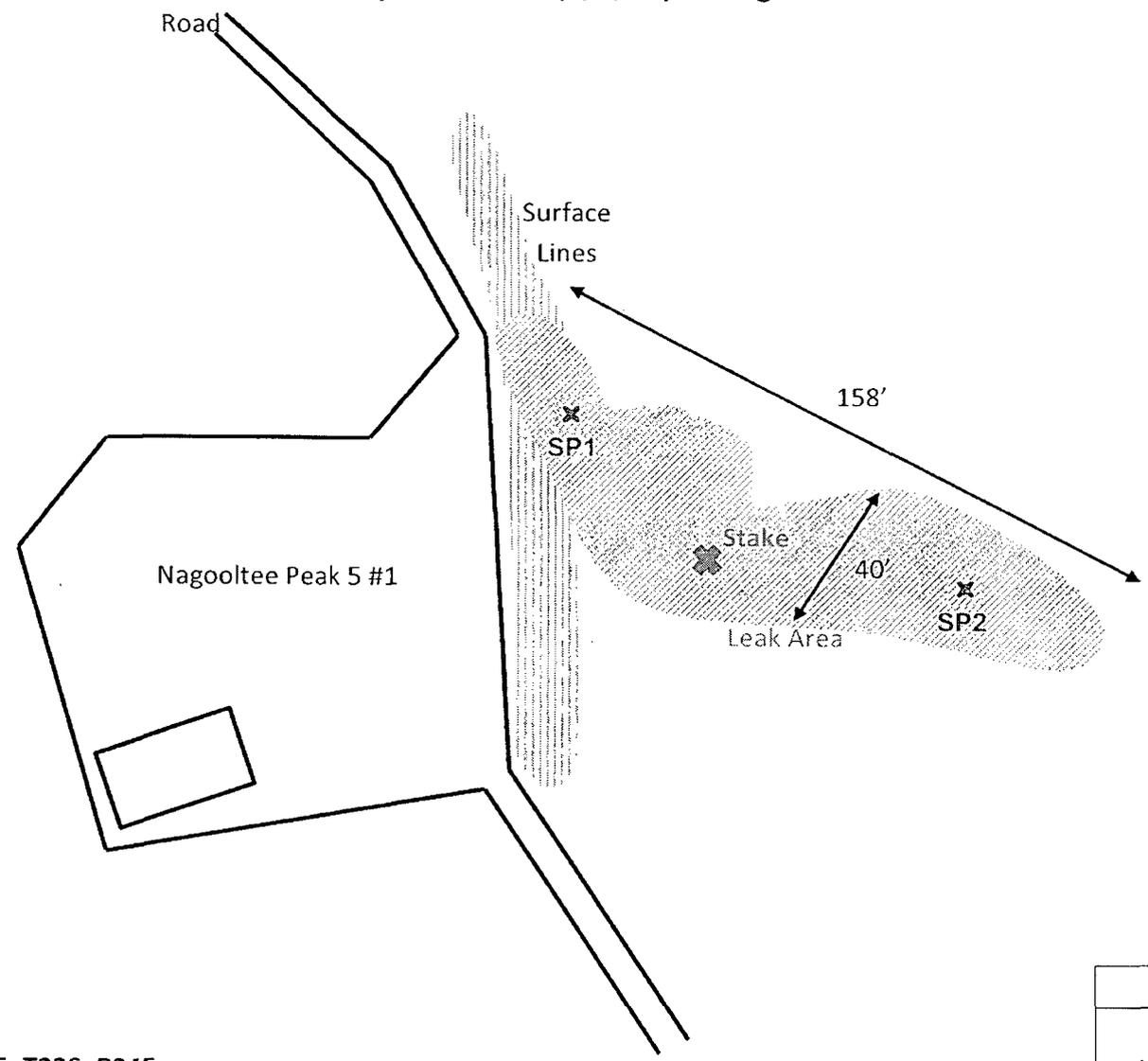
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Oxy

### Unreported Leak (6/6/12) at Nagooltee Peak 5 #1



U/L J, Section 5, T22S, R24E  
Eddy County, NM  
GPS at Stake: N 32.41728° W 104.51649°

BBC International, Inc.	
Oxy	
Unreported Leak (6/6/12)	
Date: 01/18/2013	DRWG by: K. Purvis
NOT TO SCALE	File: Oxy 2013



# Groundwater Plot

## Oxy Unreported Leak (6/6/12) At the Nagooltee Peak 5 Fed Com #1

County  
Eddy

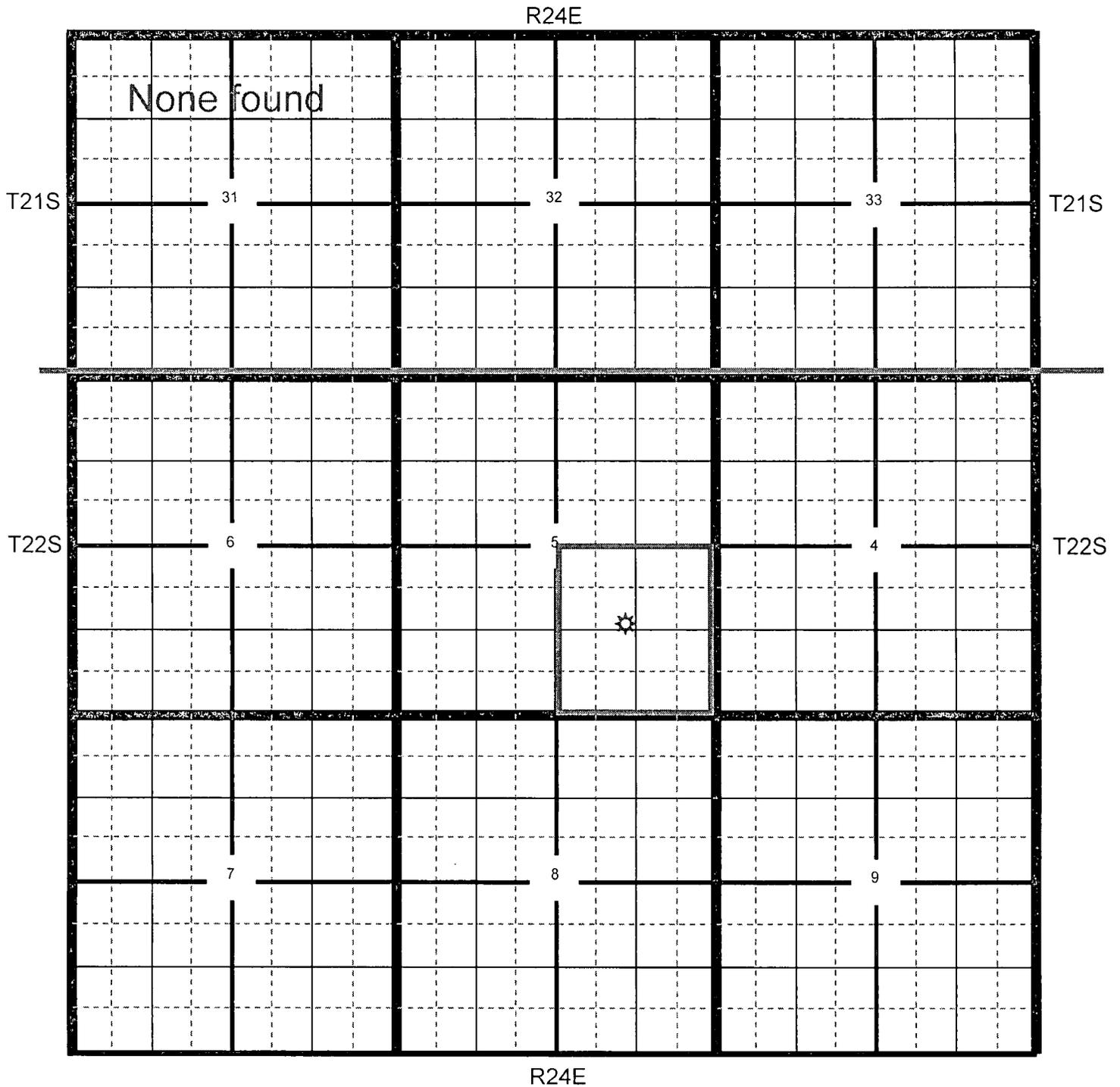
Unit Letter  
SE ¼

Section  
5

Township  
22S

Range  
24E

Trend Map <25'



☼ Location

● OCD

● USGS

● SEO

● All Databases

Section Quarters

Oxy Unreported Leak (6/6/12) at Nagooltee Peak 5 Fed Com #1

County Eddy      Unit Letter SE ¼      Section 5      Township 22S      Range 24E

Trend Map <25'

1

2

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

3

4

**Laboratory Analytical Results Summary  
Unreported Leak @ Nagooltee Peak5 #1**

		Sample	SP1 @ Surface	SP1 @ 6"
Analyte	Method	Date	2/7/13	2/7/13
			mg/Kg	mg/Kg
Benzene	BTEX 8021B		n/a	<0.050
Toluene	BTEX 8021B		n/a	<0.050
Ethylbenzene	BTEX 8021B		n/a	<0.050
Total Xylenes	BTEX 8021B		n/a	<0.150
Total BTEX	BTEX 8021B		n/a	<0.300
Chloride	SM4500Cl-B		48	704
GRO	TPH 8015M		n/a	<10.0
DRO	TPH 8015M		n/a	<10.0

		Sample	SP2 @ Surface	SP1 @ 6"
Analyte	Method	Date	2/7/13	2/7/13
			mg/Kg	mg/Kg
Benzene	BTEX 8021B		n/a	<0.050
Toluene	BTEX 8021B		n/a	<0.050
Ethylbenzene	BTEX 8021B		n/a	<0.050
Total Xylenes	BTEX 8021B		n/a	<0.150
Total BTEX	BTEX 8021B		n/a	<0.300
Chloride	SM4500Cl-B		64	816
GRO	TPH 8015M		n/a	<10.0
DRO	TPH 8015M		n/a	<10.0

February 14, 2013

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: UNREPORTED LEAK @ NAGOOLTE PEAK 5 #1

Enclosed are the results of analyses for samples received by the laboratory on 02/08/13 12:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,



Celey D. Keene

Lab Director/Quality Manager

**Analytical Results For:**

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

Received:	02/08/2013	Sampling Date:	02/07/2013
Reported:	02/14/2013	Sampling Type:	Soil
Project Name:	UNREPORTED LEAK @ NAGOOLTE PEAK	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: SP 1 @ SURFACE (H300369-01)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: DW						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	02/13/2013	ND	432	108	400	3.77		

**Sample ID: SP 1 @ 6" (H300369-02)**

BTEX 8021B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	02/13/2013	ND	2.46	123	2.00	8.61		
Toluene*	<0.050	0.050	02/13/2013	ND	2.42	121	2.00	9.04		
Ethylbenzene*	<0.050	0.050	02/13/2013	ND	2.39	119	2.00	8.61		
Total Xylenes*	<0.150	0.150	02/13/2013	ND	7.26	121	6.00	8.88		
Total BTEX	<0.300	0.300	02/13/2013	ND						

Surrogate: 4-Bromofluorobenzene (PIE) 107 % 89.4-126

Chloride, SM4500CI-B		mg/kg		Analyzed By: DW						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	704	16.0	02/13/2013	ND	432	108	400	3.77		

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	02/11/2013	ND	197	98.5	200	12.1		
DRO >C10-C28	<10.0	10.0	02/11/2013	ND	182	90.8	200	16.2		

Surrogate: 1-Chlorooctane 94.6 % 65.2-140

Surrogate: 1-Chlorooctadecane 117 % 63.6-154

Cardinal Laboratories

\* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Analytical Results For:**

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

Received:	02/08/2013	Sampling Date:	02/07/2013
Reported:	02/14/2013	Sampling Type:	Soil
Project Name:	UNREPORTED LEAK @ NAGOOLTE PEAK	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: SP 2 @ SURFACE (H300369-03)**

Chloride, SM4500CI-B	mg/kg	Analyzed By: DW							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>64.0</b>	16.0	02/13/2013	ND	432	108	400	3.77	

**Sample ID: SP 2 @ 6" (H300369-04)**

BTEX 8021B	mg/kg	Analyzed By: AP							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/13/2013	ND	2.46	123	2.00	8.61	
Toluene*	<0.050	0.050	02/13/2013	ND	2.42	121	2.00	9.04	
Ethylbenzene*	<0.050	0.050	02/13/2013	ND	2.39	119	2.00	8.61	
Total Xylenes*	<0.150	0.150	02/13/2013	ND	7.26	121	6.00	8.88	
Total BTEX	<0.300	0.300	02/13/2013	ND					

Surrogate: 4-Bromofluorobenzene (PIE) 108 % 89.4-126

Chloride, SM4500CI-B	mg/kg	Analyzed By: DW							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>816</b>	16.0	02/13/2013	ND	432	108	400	3.77	

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	02/11/2013	ND	197	98.5	200	12.1	
DRO >C10-C28	<10.0	10.0	02/11/2013	ND	182	90.8	200	16.2	

Surrogate: 1-Chlorooctane 89.9 % 65.2-140

Surrogate: 1-Chlorooctadecane 107 % 63.6-154

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

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

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



# CARDINAL LABORATORIES

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

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: BBC International, Inc.		<b>BILL TO</b>		<b>ANALYSIS REQUEST</b>																								
Project Manager: Cliff Brunson		P.O. #:																										
Address: P.O. Box 805		Company:																										
City: Hobbs State: NM Zip: 88241		Attn:																										
Phone #: 575-397-6388 Fax #: 575-397-0397		Address:																										
Project #: Project Owner: <i>NY</i>		City:																										
Project Name: <i>Compacted back to Mayville Park #1</i>		State: Zip:																										
Project Location:		Phone #:																										
Sampler Name: <i>Rocio Hernandez</i>		Fax #:																										
FOR LAB USE ONLY																												
Lab I.D.		Sample I.D.		(GRAB OR (COMP. # CONTAINERS	MATRIX				PRESERV			SAMPLING																
		GROUNDWATER	WASTEWATER		SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE / COOL	OTHER:	DATE	TIME															
<i>113003109</i>		<i>1</i>	<i>SP1 @ 500 Pcs</i>	<i>1</i>					<i>1</i>			<i>2/2/13</i>	<i>1250</i>	<i>✓</i>	<i>✓</i>	<i>✓</i>												
<i>2</i>		<i>2</i>	<i>@ 6"</i>	<i>2</i>					<i>✓</i>			<i>2/2/13</i>	<i>173</i>	<i>✓</i>	<i>✓</i>	<i>✓</i>												
<i>3</i>		<i>3</i>	<i>SP2 @ 500 Pcs</i>	<i>3</i>					<i>✓</i>			<i>2/2/13</i>	<i>135</i>	<i>✓</i>	<i>✓</i>	<i>✓</i>												
<i>4</i>		<i>4</i>	<i>@ 6"</i>	<i>4</i>					<i>✓</i>			<i>2/2/13</i>	<i>148</i>	<i>✓</i>	<i>✓</i>	<i>✓</i>												

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Relinquished By: <i>Rocio Hernandez</i>		Date: <i>2/10/13</i>		Received By: <i>Israel Pena</i>		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No		Add'l Phone #:	
Time:						Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No		Add'l Fax #:	
Relinquished By: <i>Israel Pena</i>		Date: <i>2/13/13</i>		Received By: <i>Jodi Benson</i>		REMARKS:			
Time: <i>12:00</i>									
Delivered By: (Circle One)				Sample Condition		CHECKED BY: (Initials)			
Sampler - UPS - Bus - Other:				Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/>		<i>JP</i>			
				Yes <input type="checkbox"/> No <input type="checkbox"/>					
				Yes <input type="checkbox"/> No <input type="checkbox"/>					

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

*# 26*

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 Permian Ltd.	Contact	Christopher Jones
Address	1502 W. Commerce Dr., Carlsbad, NM	Telephone No.	(575) 628-4121
Facility Name	Unreported Leak at Nagooltee Peak 5-I	Facility Type	
Surface Owner	Mineral Owner	Lease No.	

#### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
J	5	22S	24E					Eddy County, NM

Latitude N 32.41728° Longitude W 104.51649°

#### NATURE OF RELEASE

Type of Release	Produced water	Volume of Release	Unknown	Volume Recovered	0 bbls
Source of Release	Unknown	Date and Hour of Occurrence	Unknown	Date and Hour of Discovery	06/06/12
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?			
By Whom?	Terry Gregston of BLM	Date and Hour			
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.* An unknown problem caused an undetermined amount of produced water to leak onto the ground. No fluids were recovered. The leak was discovered by Terry Gregston of the BLM.					
Describe Area Affected and Cleanup Action Taken.* An unknown problem caused an undetermined amount of produced water to leak onto the ground. No fluids were recovered. The leak was discovered by Terry Gregston of the BLM. Remediation will be completed in accordance with a remediation plan approved by NMOCD and the BLM.					
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.					
Signature:	<u>OIL CONSERVATION DIVISION</u>				
Printed Name:	Christopher Jones	Approved by District Supervisor:			
Title:	HES Specialist	Approval Date:	Expiration Date:		
E-mail Address:	Christopher_Jones@oxy.com	Conditions of Approval:			Attached <input type="checkbox"/>
Date:	1-22-13	Phone:	(575) 628-4121		

\* Attach Additional Sheets If Necessary