Bratcher, Mike, EMNRD

From:

Cliff P. Brunson <cbrunson@bbcinternational.com>

Sent:

Thursday, January 02, 2014 12:38 PM

To:

Bratcher, Mike, EMNRD

Cc:

Chris Jones; Ken Swinney; Jennifer Gilkey; Kathy Purvis

Subject:

OXY-Two Marks 36 State #4-Remediation Plan

Attachments:

Remediation Packet- Two Marks 36-4.pdf

Mike,

This e-mail is to confirm our conversation on December 18, 2013 about the remediation plan for the above referenced site. I have attached the materials that we used in our discussion. As discussed, Oxy will surface scrape the entire spill area and at SP-1 will resample to delineate to a minimum of 1,000 ppm Chloride and present the lab results to the NMOCD.

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

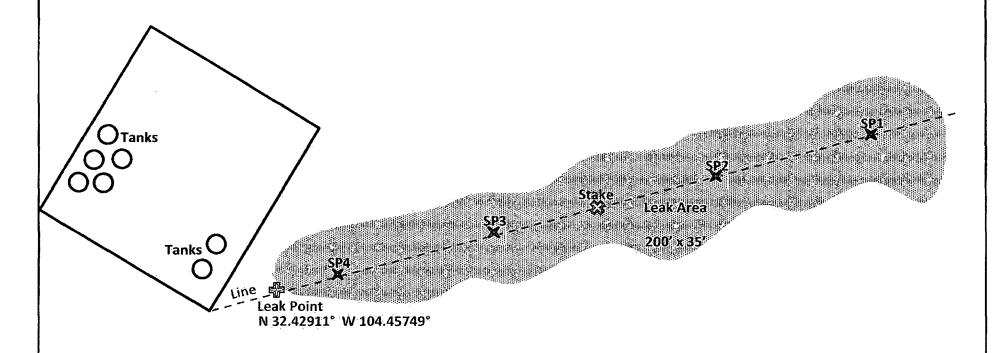
Thanks, Cliff

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

E-Mail: cbrunson@bbcinternational.com

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Оху

U/L O, Section 36, T21S, R24E 670' FSL and 1905' FEL **Eddy County, NM**

GPS at stake: N 32.42917° W 104.45789°

API# 30-015-34833

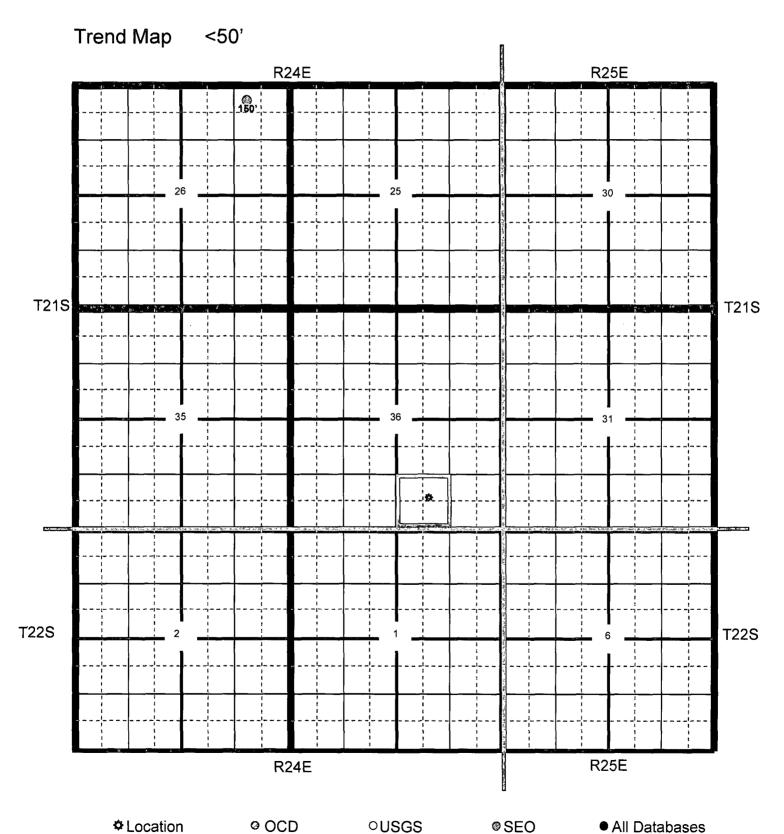
BBC Interr	national, Inc.		
C	Оху		
Two Marks 36 State #4			
Date: 10/11/2013	DRWG by: K. Purvis		
NOT TO SCALE	File: Oxy 2013		



Groundwater Plot

Oxy Two Marks 36 State #4

CountyUnit LetterSectionTownshipRangeLeaO3621S24E





Section Quarters

Oxy Two Marks 36 State #4

County Eddy

Unit Letter

Section 36

Township

Range

Trend Map <50'

218

24E

2

1

NW/NW	NE/NW	NW/NE	NEINE
None found			
Unit Letter D	Unit Letter C	Unit Letter B	Unit Letter A
SWNW	SENW	SWYNE	SE/NE
† 1 1		1	
1 1 1 1			
Unit Letter E	Unit Letter F	Unit Letter G	Unit Letter H
NW/SW	NE/SW	NWISE	NE/SE
1			
		1	
Unit Letter L	Unit Letter K	Unit Letter J	Unit Letter I
SW/SW	SE/SW	SW/SE	SE/SE
1			
		*	
		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
Unit Letter M	Unit Letter N	Unit Letter O	Unit Letter P

3

4

❖ Location

© OCD

 \circ_{USGS}

SEO

• All Databases

Laboratory Analytical Results Summary Two Marks 36 State #4

		Sample	SP1@ SURFACE	SP1 @ 6"
Analyte	Method	Date	12/2/13	12/2/13
		ĺ	mg/Kg	mg/Kg
Benzene	BTEX 8021B		n/a	n/a
Toluene	BTEX 8021B		n/a	n/a
Ethylbenzene	BTEX 8021B		n/a	n/a
Total Xylenes	BTEX 8021B	I	n/a	n/a
Total BTEX	BTEX 8021B	T	n/a	n/a
Chloride	SM4500CI-B	1	2440	2120
GRO	TPH 8015M		n/a	n/a
DRO	TPH 8015M		n/a	n/a

		Sample	SP2@	SP2 @ 6"
Analyte	Method	Date	12/2/13	12/2/13
			mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.050	n/a
Toluene	BTEX 8021B		<0.050	n/a
Ethylbenzene	BTEX 8021B		<0.050	n/a
Total Xylenes	BTEX 8021B	1	<0.150	n/a
Total BTEX	BTEX 8021B	1	<0.300	n/a
Chloride	SM4500CI-B		32	96
GRO	TPH 8015M	i	<10.0	n/a
DRO	TPH 8015M		10.1	n/a

		Sample	SP3 @ SURFACE	SP3 @ 6"
Analyte	Method	Date	12/2/13	12/2/13
			mg/Kg	mg/Kg
Benzene	BTEX 8021B		n/a	n/a
Toluene	BTEX 8021B		n/a	n/a
Ethylbenzene	BTEX 8021B		n/a	n/a
Total Xylenes	BTEX 8021B		n/a	n/a
Total BTEX	BTEX 8021B		n/a	n/a
Chloride	SM4500CI-B		832	640
GRO	TPH 8015M		n/a	n/a
DRO	TPH 8015M		n/a	n/a

		Sample	SP4 @ SURFACE	SP4 @ 6"
Analyte	Method	Date	12/2/13	12/2/13
			mg/Kg	mg/Kg
Benzene	BTEX 8021B		n/a	n/a
Toluene	BTEX 8021B		n/a	n/a
Ethylbenzene	BTEX 8021B		n/a	n/a
Total Xylenes	BTEX 8021B		n/a	n/a
Total BTEX	BTEX 8021B		n/a	n/a
Chloride	SM4500CI-B		160	160
GRO	TPH 8015M		n/a	n/a
DRO	TPH 8015M		n/a	n/a



December 16, 2013

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: TWO MARKS 36 STATE #4

Enclosed are the results of analyses for samples received by the laboratory on 12/05/13 16:45.

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

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 & Keens

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:

12/05/2013

Sampling Date:

12/02/2013

Reported:

12/16/2013

Sampling Type:

Soil

Project Name:

TWO MARKS 36 STATE #4

Sampling Condition:

Cool & Intact

Project Number:

NONE GIVEN

Project Location:

INDIAN BASIN

Sample Received By:

Jodi Henson

Sample ID: SP 1 @ SURFACE (H302953-01)

Ch	loride	, SM4	1500	CI-B

mg/kg

Analyzed By: AP

Analyzed

Analyzed

Chloride

Chloride

Result 2440

16.0 12/16/2013

Reporting Limit

Method Blank ND

BS 432 % Recovery 108

108

True Value QC 400

RPD 3.77 Qualifier

Sample ID: SP 1 @ 6 IN. (H302953-02)

Chlorido	SM4500CI-B

mg/kg	
-------	--

Analyzed By: AP

Result 2120 Reporting Limit 16.0 12/16/2013 Method Blank ND

BS 432

True Value QC % Recovery

400

RPD

3.77

Qualifier

Sample ID: SP 2 @ SURFACE (H302953-03)

BTEX 8021B mg		mg/kg		Analyzed By: CK					S-04
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/06/2013	ND	2.24	112	2.00	1.34	
Toluene*	<0.050	0.050	12/06/2013	ND	2.27	114	2.00	2.47	
Ethylbenzene*	<0.050	0.050	12/06/2013	ND	2.27	114	2.00	3.35	
Total Xylenes*	<0.150	0.150	12/06/2013	ND	6.80	113	6.00	4.86	
Total BTEX	<0.300	0.300	12/06/2013	ND					

Surrogate: 4-Bromofluorobenzene (PIL

Analyte

Analyte

131%

89.4-126

Reporting Limit

16.0

Reporting Limit

Chloride,	SM45	

Chloride

TPH 8015M

mg/kg

mg/kg

Result

32.0

Result

Analyzed

12/16/2013

Analyzed

Analyzed By: AP Method Blank

ND

Method Blank

BS 432

BS

% Recovery 108

% Recovery

True Value QC 400 3.77

True Value QC

RPD Qualifier

RPD

Cardinal Laboratories

*=Accredited Analyte

Qualifier

claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such

Analyzed By: ck

Celey D. Keene

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:

12/05/2013

Sampling Date:

12/02/2013

Reported:

12/16/2013

Sampling Type:

Soil

Project Name:

TWO MARKS 36 STATE #4

Sampling Condition:

Cool & Intact

Project Number:

NONE GIVEN

Sample Received By:

Jodi Henson

Project Location:

INDIAN BASIN

Sample ID: SP 2 @ SURFACE (H302953-03)

TPH 8015M	mg	/kg	Analyze	d By: ck					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	12/06/2013	ND	192	96.0	200	11.2	
DRO >C10-C28	10.1	10.0	12/06/2013	ND	190	95.1	200	12.5	
Surrogate: 1-Chlorooctane	103	% 65.2-14	0						
Surrogate: 1-Chlorooctadecane	100	% 63.6-15	4						

Sample ID: SP 2 @ 6 IN. (H302953-04)

Chloride, SM4500CI-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	96.0 16.0		12/16/2013 ND		108	400	3.77	
Sample ID: SP 3 @ SURF	ACE (H302953	-05)							
Chloride, SM4500CI-B	mg	/kg	Analyze	d By: AP				***	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	832	16.0	12/16/2013	ND	432	108	400	3.77	
Sample ID: SP 3 @ 6 IN.	(H302953-06)								
Chloride, SM4500CI-B	mg	/kg	g Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier

Cardinal Laboratories

Chloride

*=Accredited Analyte

3.77

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ND

432

108

400

12/16/2013

Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager

640

16.0



Analytical Results For:

BBC International, Inc.

Cliff Brunson P.O. Box 805

Hobbs NM, 88241

Fax To:

(575) 397-0397

Received:

12/05/2013

Sampling Date:

12/02/2013

Reported:

12/16/2013

Sampling Type:

Soil

Project Name:

TWO MARKS 36 STATE #4

Sampling Condition:

Cool & Intact

Project Number:

NONE GIVEN

Project Location:

INDIAN BASIN

Sample Received By:

Jodi Henson

Sample ID: SP 4 @ SURFACE (H302953-07)

Chloride, SM4500Cl-B	ide. SM450	00CI-B
----------------------	------------	--------

mg/kg

Analyzed By: AP

Analyte

Result 160

12/16/2013

% Recovery True Value QC

RPD 3.77 Qualifier

Chloride

160

16.0

Reporting Limit

Method Blank ND

BS 432

108

Sample ID: SP 4 @ 6 IN. (H302953-08)

Chloride, SM4500CI-B

Analyzed By: AP

Analyte

Result Reporting Limit Analyzed

Method Blank

BS

% Recovery 108

True Value QC 400

400

Qualifier

Chloride

16.0

12/16/2013

Analyzed

ND

432

3.77

RPD

Cardinal Laboratories *=Accredited Analyte

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Celeg & Kreens Celey D. Keene, Lab Director/Quality Manager

Page 4 of 6



Notes and Definitions

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

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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Celey D. Keine

101 East Marland, Hobbs, NM 88240

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name	BBC International, Inc.	34 1					BIL	470	479					ANALYSIS REQUEST							
Project Manage	r: Cliff Brunson				P.O.	#:															
Address: P.O.	Box 805	New .			Con	npany	/:							1	l be	1.					1
City: Hobbs	State: NN	Zip	: 8	88241	Attn	:						i .				1				ļ :-	
Phone #: 575-3	397-6388 Fax #: 57	75-397	7-0:	397	Add	ress:			•	l · ·			· · ·		1				i .		
Project #:	Project Own	ner: Ø	Хч	-	City	:	المكال	ne].		١.	.	1	1	1		· .			
Project Name: 7	Two marks 36 States	#4		·	State	e:		Zip:											٠.		
	: Indian Basin				Phone #:						ŀ	ļ									
Sampler Name:					Fax	#:				} .				}	1		1	·			
FOR LAB USE ONLY				MATRIX	P	RESE	RV.	SAMPLI	NG	1				İ							
Lab I.D. }1302953	Sample I.D.	(G)RAB OR (C)OMP	# CONTAINERS	GROUNDWATER WASTEWATER SOIL OIL SLUDGE	OTHER:	ACID/BASE:	OTHER:	DATE	TIME	-72	TPH	BTEK									
)	SP 2 Q Surface	6	2	X		X		D.2-13	10:30	X											
2	space bin	6	1	X		_X		27-13	10:30	X											
3	SP 20 Surface	6	2	X		X		7-2-13	10:48	X	X	X									
4	90206,n	G	2			-X		7-2-13	11:15	-X -				ļ							
	593@ for Face	<u></u> 6	2	X		X		2-2-13		X				<u> </u>		<u> </u>	<u> </u>				
6	SP 3 Cloi A SP 4 Surface	G	2	X		ΙX		2-2-13		X		<u> </u>			<u> </u>	<u> </u>	<u> </u>				
7	SP4 Surface	_6	2			<u> </u>			12:45	X											
8	59406, A	G	2	X		X	1	2-2-13	1:15	V.											
						\perp										i					

Relinquished By:	13/13 R		Phone Result: Fax Result: REMARKS:	□ Yes □ Yes	□ No □ No	Add'l Phone #: Add'l Fax #:	
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	Time: 5.	Sample Condition CHECKED BY: Cool Intact (luminals) Per 2 ves No No No					· · · · · · · · · · · · · · · · · · ·

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

District 1
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

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 Fin						Final Rep	ort		
Name of Company Oxy Permian Ltd.						Contact Christopher Jones									
Address 1502 W. Commerce Dr., Carlsbad, NM						Telephone No. (575) 628-4121									
Facility Nat	ne Two	Marks 36 St		Facility Type Well location											
Surface Ow	ner State			Mineral C	wner				API No	. 30-015-3	4833				
				LOCA	TIO	OF REI	EASE								
Unit Letter	Section	Township	Range	Feet from the		South Line									
0	36	218	24E	670		South	1905	East/We Ea		Eddy County, NM					
Latitude <u>N 32.43007°</u> Longitude <u>W 104.4490°</u>															
				N'AT	IIDE	OF RELI	FASE	_							
Type of Rele	ase Produ	ced water		NAI	UKE		Release 90 bbls		/olume B	lecovered	0 bbis		_		
Source of Re		steel disposal	ine				lour of Occurrence		<u> </u>	Hour of Dis			-		
				_		09/26/2013	and the second of the second o	·		.,04, 0, -10					
Was Immedia	te Notice C					If YES, To									
		×	Yes 📙	No 🔲 Not Re	quired	Mike Brato	her- OCD								
By Whom?	Christoph	er Jones				Date and H	our 09/30/2013	3 @ 9:07 a	ım		······································		\exists		
Was a Watercourse Reached?						If YES, Vo	lume Impacting t								
		L	Yes 🏻	No											
If a Watercou	irse was Im	pacted, Descri	be Fully.*			<u></u>									
						•									
Describe Cau	se of Proble	em and Remed	lial Action	Taken.*											
A leak in a 4'	steel dispo	sal line cause	d 90 bbls o	of produced water	to leak	onto the grou	ınd. No fluids we	re recover	ed and th	ne line was i	epaired	l/replaced.			
Describe Are	a Affected a	and Cleanup A	ction Tak	en.*	····	·			-				\dashv		
		•											1		
The area affe	cted is appr	oximately 350	' x 30'. R	temediation will b	e comp	leted in accor	dance with an app	proved pla	ın from N	IMOCD.					
I hereby certi	fy that the i	nformation gi	ven above	is true and compl	ete to th	ne best of my	knowledge and u	nderstand	that purs	uant to NM	OCD ru	iles:and	\exists		
regulations al	l operators	are required to	report an	d/or file certain re	elease no	otifications ar	id perform correct	tive action	s for rele	eases which	may er	danger			
							arked as "Final Re on that pose a thre								
or the enviror	ment. In a	ddition: NMO	CD accept	tance of a C-141	eport de	contamination	on that pose a three the operator of r	esponsibil	lity for co	, surface wa ompliance v	rith anv	other			
federal, state,	or local lav	vs and/ør regu	lations.					_		_					
	MA					OIL CONSERVATION DIVISION									
Signature:	11//	1/				·									
J.g.iatare.	164 J	<u> </u>				Annroyed by	District Supervise	γė							
Printed Name	: Christo	pher Jones				thibioaca pa	District Supervise					_			
Title: HES	Specialist					Approval Dat	e:	Ex	piration I	Date:					
E-mail Addre	ss: Chris	topher Jones	®oxv.com		1	Conditions of	Approval:				_				
100	(f) =		J=1.5140111				- Ashiotan			Attached					
Date: / () -	8-13		Phone:	(575) 628-412						<u> </u>					
Attach Addit	ional Shee	ts If Necessa	arv												