

# Closure Report

**RECEIVED**

By OCD; Dr. Oberding at 8:25 am, Mar 24, 2015

## Site Description

Site Name:	MLMU #244
Company:	Oxy Permian Ltd.
Legal Description:	U/L M, Section 7, T24S, R37E
County:	Eddy County, NM
GPS Coordinates:	N 32.22638° W 103.20776°

## Release Data

Date of Release:	06/19/2014
Type of Release:	Produced water
Source of Release:	Livestock kicked open the valve at the well head
Volume of Release:	80 bbls
Volume Recovered:	10 bbls

## Remediation Specifications

Remediation Parameters:	In the area around SP1, excavate to a depth of 5 feet OR excavate to a depth of 3 feet and place a liner in the excavation. The remaining leak area should be excavated to a depth of 1 foot.	
Remediation Activities:	03/12/2015 to 03/19/2015	
Plan Sent to OCD:	10/20/2014	Email from Cliff Brunson to Tomas Oberding
OCD Approval of Plan:	10/21/2014	Email from Tomas Oberding to Cliff Brunson
Plan Sent to BLM:	10/20/2014	Email from Cliff Brunson to Sol Hughes
BLM Approval of Plan:	10/21/2014	Email from Sol Hughes to Cliff Brunson

## Supporting Documentation

Initial C-141	Signed 06/23/2014
Final C-141	Signed 03/23/2015
Site Diagram	July 2014
Groundwater Plot	100'
TOPO Maps	July 2014
Lab Summary	08/29/2014
Lab Analysis	08/29/2014
Correspondence	Request and approval of remediation plan via email

## Request for Closure

Based on the completion of the remediation plan as agreed upon, BBC International requests closure approval from NMOCD.

Cliff Brunson, President of BBC International Inc.

03/23/2015

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	Chancey Summers
Address	1017 W. Stanolind Rd, Hobbs, NM 88240	Telephone No.	(575) 397-8216
Facility Name	MLMU #244	Facility Type	Well location
Surface Owner	BLM	Mineral Owner	
		API No.	30-025-11048

#### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
M	7	24S	37E	660	South	660	West	Lea County, NM

Latitude N 32.22603° Longitude W 103.20740°

#### NATURE OF RELEASE

Type of Release	Produced water	Volume of Release	80 bbls	Volume Recovered	10 bbls
Source of Release	Livestock kicked open the valve at the well head	Date and Hour of Occurrence	06/19/2014	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?	Geoffrey Leking, NMOCD and Jennifer VanCuren, BLM		
By Whom?	Kathy Purvis	Date and Hour	06/19/2014		
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.\*

Livestock kicked open the valve at the well head causing 80 bbls of produced water to spill onto the ground. A vacuum truck recovered 10 bbls of produced water and the valve was closed.

Describe Area Affected and Cleanup Action Taken.\*

The affected area is approximately 150' x 60' on location near the well head. 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: 		<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Chancey Summers		Approved by Environmental Specialist:	
Title: HES Specialist	Approval Date:	Expiration Date:	
E-mail Address: <u>Chancey.Summers@oxy.com</u>	Conditions of Approval:		Attached <input type="checkbox"/>
Date: <u>6-23-14</u>	Phone: (575) 397-8216		

\* 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 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	Christopher Jones
Address	1502 W. Commerce Dr., Carlsbad, NM	Telephone No.	(575) 628-4121
Facility Name	MLMU #244	Facility Type	Well location
Surface Owner	BLM	Mineral Owner	
		API No.	30-025-11048

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
M	7	24S	37E	660	South	660	West	Lea County, NM

Latitude N 32.22603° Longitude W 103.20740°

**NATURE OF RELEASE**

Type of Release	Produced water	Volume of Release	80 bbls	Volume Recovered	10 bbls
Source of Release	Livestock kicked open the valve at the well head	Date and Hour of Occurrence	06/19/2014	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?	Geoffrey Leking, NMOCD and Jennifer VanCuren, BLM		
By Whom?	Kathy Purvis	Date and Hour	06/19/2014		
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.\*

Livestock kicked open the valve at the well head causing 80 bbls of produced water to spill onto the ground. A vacuum truck recovered 10 bbls of produced water and the valve was closed.

Describe Area Affected and Cleanup Action Taken.\*

The affected area is approximately 150' x 60' on location near the well head. Remediation was completed in accordance with the remediation plan approved by Tomas Oberding of NMOCD via email 10/21/2014 and approved by Sol Hughes of the BLM via email on 10/22/2014.

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.

**OIL CONSERVATION DIVISION**

Signature: **Chris Jones**  
Digitally signed by Chris Jones  
DN: cn=Chris Jones, o=ou,  
email=ckjones888@yahoo.com,  
c=US  
Date: 2015.03.23 10:37:42 -0500

Printed Name: Christopher Jones

Approved by Environmental Specialist:

Title: HES Specialist

Approval Date:

Expiration Date:

E-mail Address: Christopher.Jones@oxy.com

Conditions of Approval:

Attached ☐

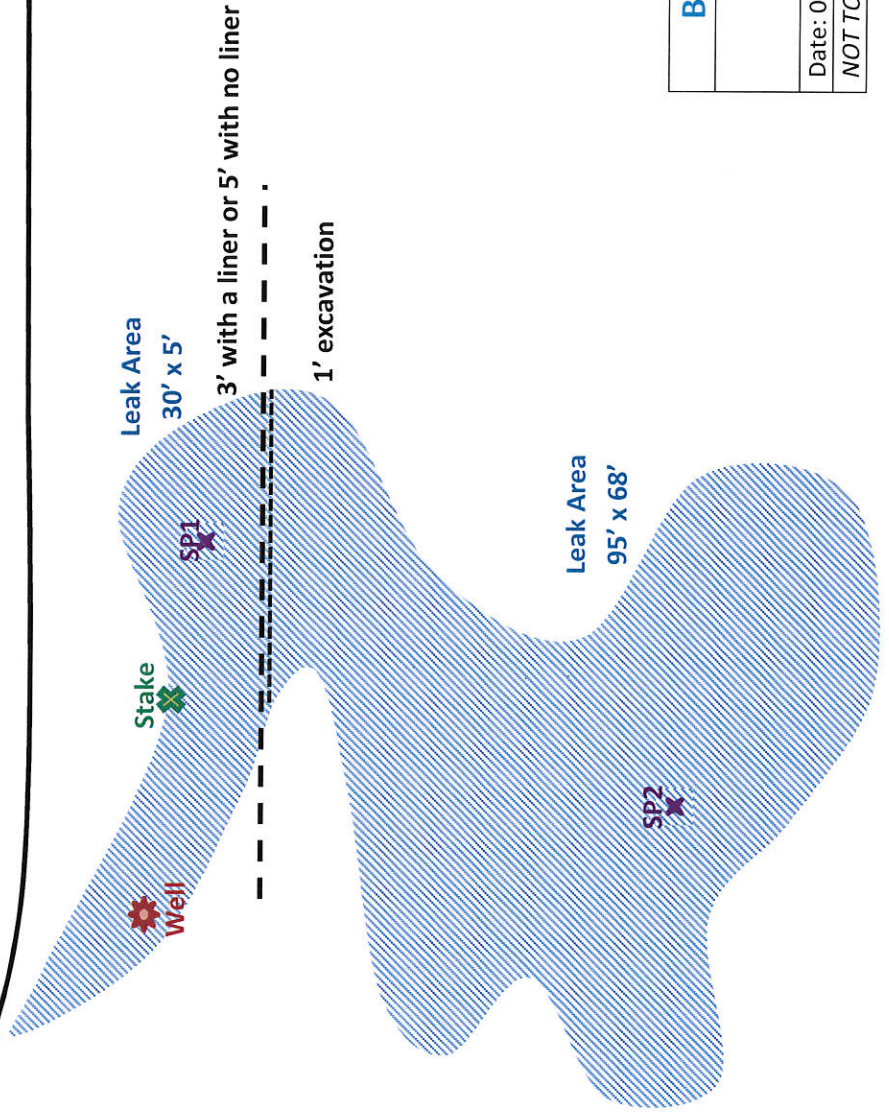
Date: 3/23/15 Phone: (575) 628-4121

\* Attach Additional Sheets If Necessary



Oxy  
MLMU #244

Road



U/L M, Section 7, T24S, R37E  
Lea County, NM  
N 32.22638° W 103.20776°  
API# 30-025-11048

BBC International, Inc.

Oxy

MLMU #244

Date: 07/03/14

DRWG by: K. Purvis

NOT TO SCALE

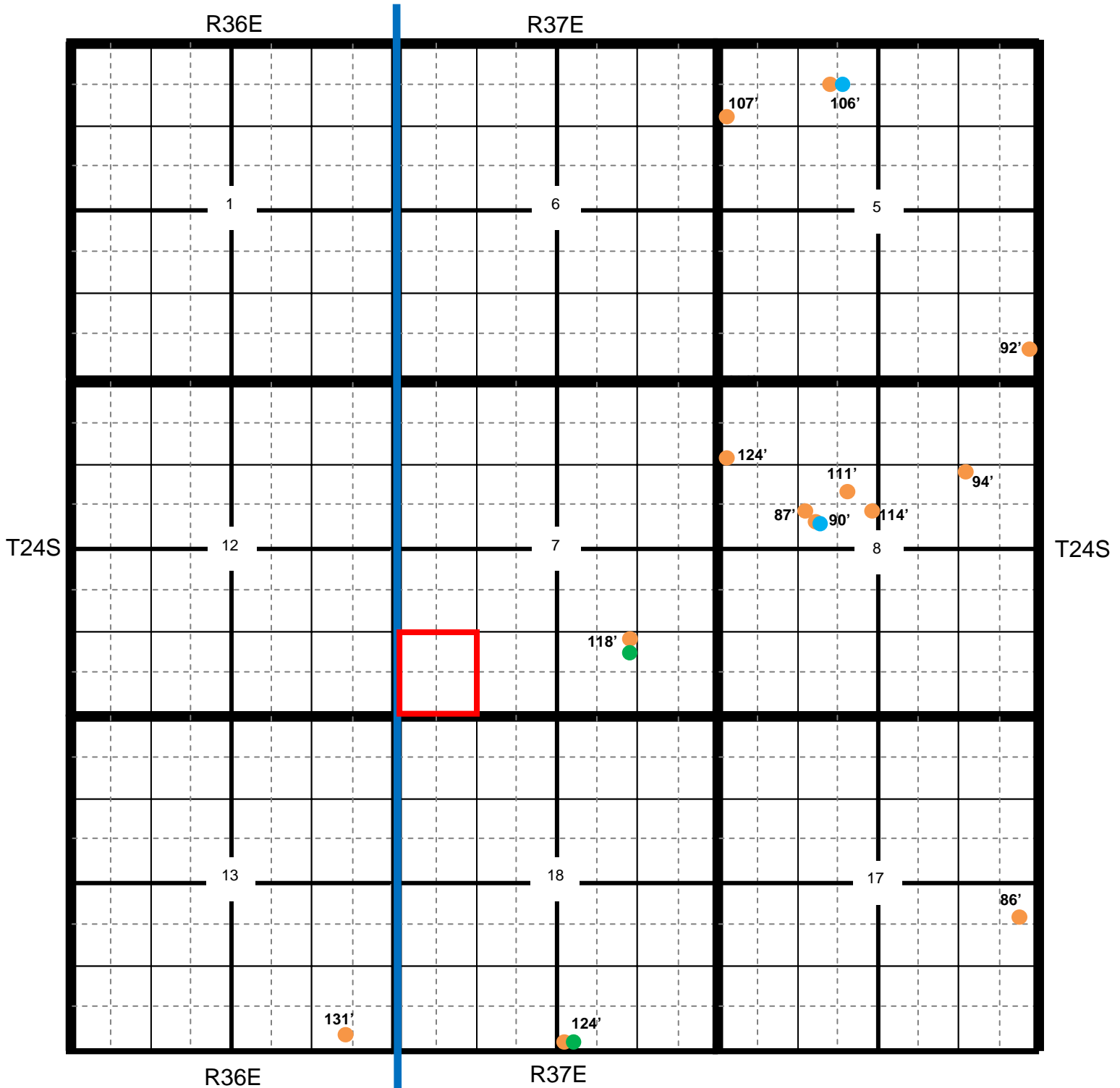
File: Oxy 2014

# Groundwater Plot

Oxy MLMU #244

County	Unit Letter	Section	Township	Range
Lea County	M	7	24S	37E

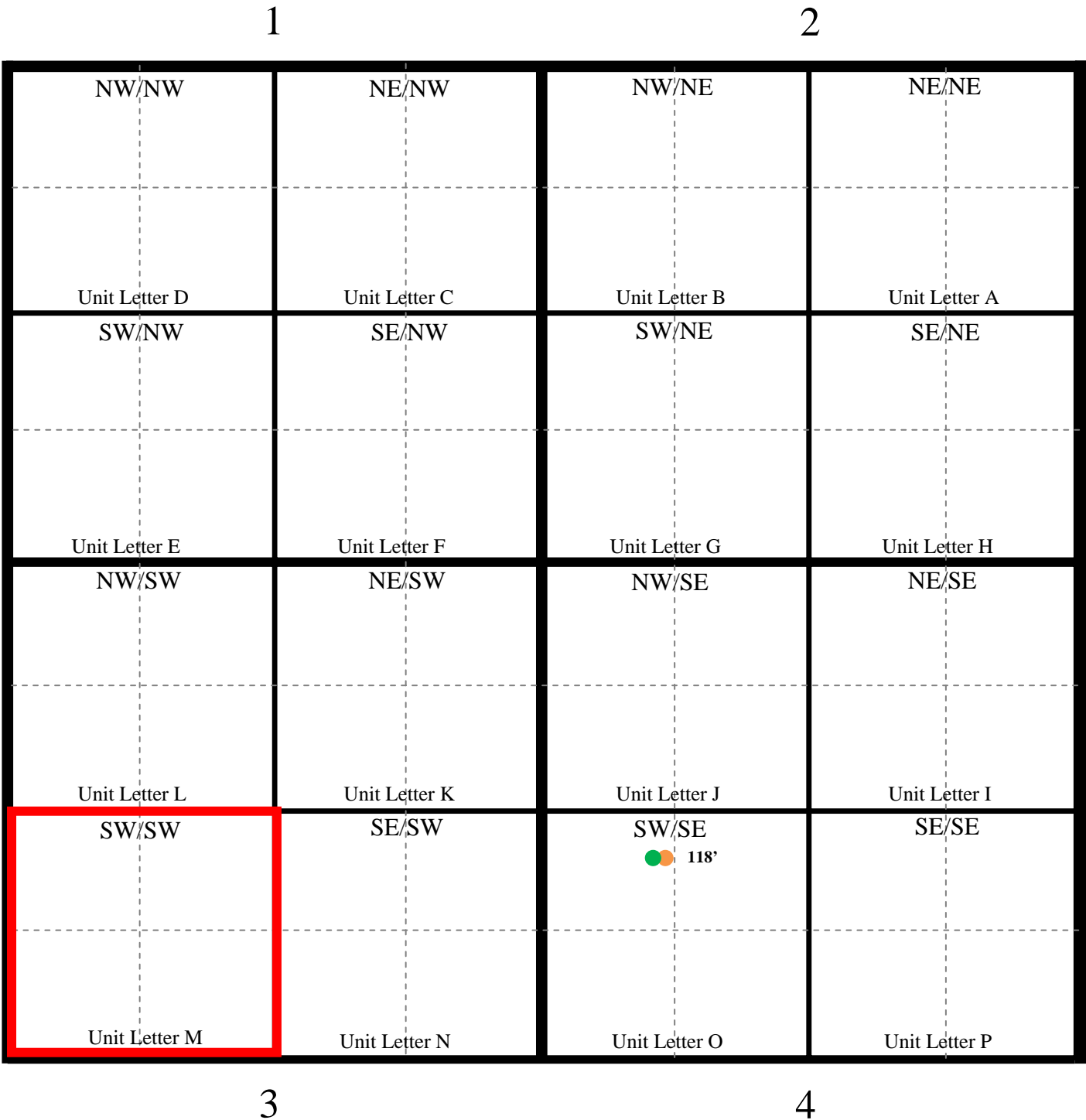
Trend Map 100'



# Oxy MLMU #244

<b>County</b>	<b>Unit Letter</b>	<b>Section</b>	<b>Township</b>	<b>Range</b>
Lea County	M	7	24S	37E

Trend Map 100'



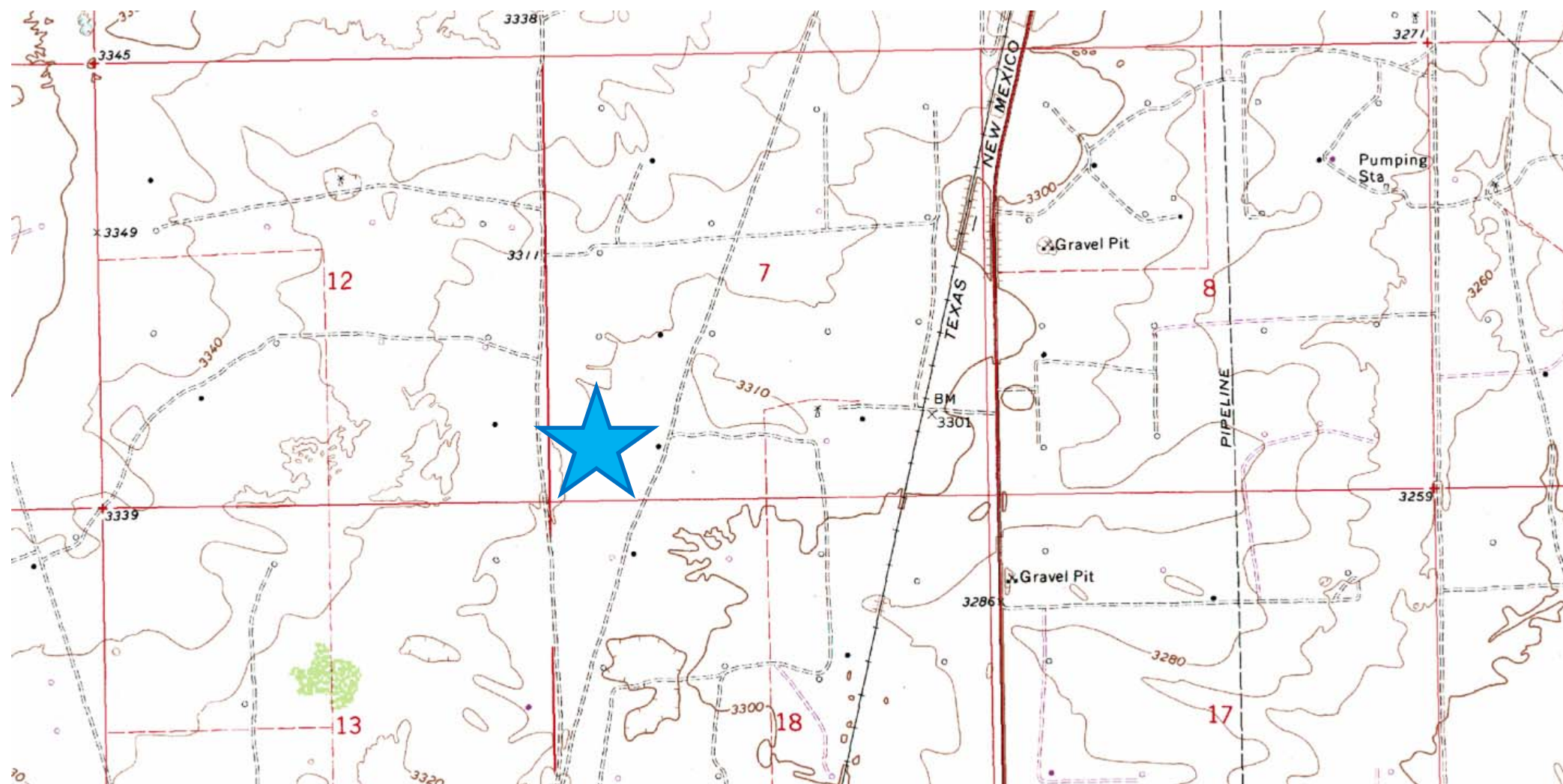






# Oxy

## MLMU #244





**Laboratory Analytical Results Summary**  
**MLMU #244**

		Sample	SP1 @ SURFACE	SP1 @ 1'	SP1 @ 2'	SP1 @ 3'	SP1 @ 4'	SP1 @ 5'	SP1 @ 6'
Analyte	Method	Date	8/29/14	8/29/14	8/29/14	8/29/14	8/29/14	8/29/14	8/29/14
			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
<b>Benzene</b>	BTEX 8021B		n/a	<0.050	n/a	<0.050	n/a	<0.050	n/a
<b>Toluene</b>	BTEX 8021B		n/a	<0.050	n/a	<0.050	n/a	<0.050	n/a
<b>Ethylbenzene</b>	BTEX 8021B		n/a	<0.050	n/a	<0.050	n/a	<0.050	n/a
<b>Total Xylenes</b>	BTEX 8021B		n/a	<0.150	n/a	<0.150	n/a	<0.150	n/a
<b>Total BTEX</b>	BTEX 8021B		n/a	<0.300	n/a	<0.300	n/a	<0.300	n/a
<b>Chloride</b>	SM4500Cl-B		<b>1840</b>	<b>896</b>	<b>976</b>	<b>1280</b>	<b>784</b>	<b>1230</b>	<b>496</b>
<b>GRO</b>	TPH 8015M		n/a	<10.0	n/a	<10.0	n/a	<20.0	n/a
<b>DRO</b>	TPH 8015M		n/a	<b>20.9</b>	n/a	<10.0	n/a	<20.0	n/a

		Sample	SP2 @ SURFACE	SP2 @ 1'	SP2 @ 2'	SP2 @ 3'	SP2 @ 4'	SP2 @ 5'	SP2 @ 6'
Analyte	Method	Date	8/29/14	8/29/14	8/29/14	8/29/14	8/29/14	8/29/14	8/29/14
			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
<b>Benzene</b>	BTEX 8021B		n/a	<0.050	n/a	<0.050	n/a	<0.050	n/a
<b>Toluene</b>	BTEX 8021B		n/a	<0.050	n/a	<0.050	n/a	<0.050	n/a
<b>Ethylbenzene</b>	BTEX 8021B		n/a	<0.050	n/a	<0.050	n/a	<0.050	n/a
<b>Total Xylenes</b>	BTEX 8021B		n/a	<0.150	n/a	<0.150	n/a	<0.150	n/a
<b>Total BTEX</b>	BTEX 8021B		n/a	<0.300	n/a	<0.300	n/a	<0.300	n/a
<b>Chloride</b>	SM4500Cl-B		<b>876</b>	<b>720</b>	<b>800</b>	<b>704</b>	<b>720</b>	<b>448</b>	<b>848</b>
<b>GRO</b>	TPH 8015M		n/a	<20.0	n/a	<10.0	n/a	<10.0	n/a
<b>DRO</b>	TPH 8015M		n/a	<20.0	n/a	<b>107</b>	n/a	<b>262</b>	n/a



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

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September 08, 2014

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: MLMU #244

Enclosed are the results of analyses for samples received by the laboratory on 08/29/14 16:15.

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](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,

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

**Analytical Results For:**

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

Received: 08/29/2014  
Reported: 09/08/2014  
Project Name: MLMU #244  
Project Number: OXY  
Project Location: EUNICE, NM

Sampling Date: 08/29/2014  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: SP 1 @ SURFACE (H402686-01)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1840	16.0	09/04/2014	ND	400	100	400	0.00	

**Sample ID: SP 1 @ 1 (H402686-02)**

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	09/04/2014	ND	1.93	96.5	2.00	4.03	
Toluene*	<0.050	0.050	09/04/2014	ND	1.74	86.9	2.00	4.69	
Ethylbenzene*	<0.050	0.050	09/04/2014	ND	1.87	93.4	2.00	6.04	
Total Xylenes*	<0.150	0.150	09/04/2014	ND	5.55	92.5	6.00	6.72	
Total BTEx	<0.300	0.300	09/04/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 101 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	896	16.0	09/04/2014	ND	400	100	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	<10.0	10.0	09/03/2014	ND	188	94.0	200	5.33	
DRO >C10-C28	20.9	10.0	09/03/2014	ND	248	124	200	7.56	

Surrogate: 1-Chlorooctane 124 % 65.2-140

Surrogate: 1-Chlorooctadecane 144 % 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: 08/29/2014  
Reported: 09/08/2014  
Project Name: MLMU #244  
Project Number: OXY  
Project Location: EUNICE, NM

Sampling Date: 08/29/2014  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: SP 1 @ 2 (H402686-03)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	976	16.0	09/04/2014	ND	400	100	400	0.00	

**Sample ID: SP 1 @ 3 (H402686-04)**

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	09/04/2014	ND	1.93	96.5	2.00	4.03	
Toluene*	<0.050	0.050	09/04/2014	ND	1.74	86.9	2.00	4.69	
Ethylbenzene*	<0.050	0.050	09/04/2014	ND	1.87	93.4	2.00	6.04	
Total Xylenes*	<0.150	0.150	09/04/2014	ND	5.55	92.5	6.00	6.72	
Total BTEX	<0.300	0.300	09/04/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 101 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1280	16.0	09/04/2014	ND	400	100	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	<10.0	10.0	09/03/2014	ND	188	94.0	200	5.33	
DRO >C10-C28	<10.0	10.0	09/03/2014	ND	248	124	200	7.56	

Surrogate: 1-Chlorooctane 126 % 65.2-140

Surrogate: 1-Chlorooctadecane 146 % 63.6-154

Cardinal Laboratories

\*=Accredited Analyte

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 the 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.



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: 08/29/2014  
Reported: 09/08/2014  
Project Name: MLMU #244  
Project Number: OXY  
Project Location: EUNICE, NM

Sampling Date: 08/29/2014  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: SP 1 @ 4 (H402686-05)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	784	16.0	09/04/2014	ND	400	100	400	0.00	

**Sample ID: SP 1 @ 5 (H402686-06)**

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	09/04/2014	ND	1.87	93.5	2.00	7.35	
Toluene*	<0.050	0.050	09/04/2014	ND	1.73	86.6	2.00	7.36	
Ethylbenzene*	<0.050	0.050	09/04/2014	ND	1.63	81.7	2.00	7.18	
Total Xylenes*	<0.150	0.150	09/04/2014	ND	4.95	82.4	6.00	6.76	
Total BTEx	<0.300	0.300	09/04/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 102 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1230	16.0	09/04/2014	ND	400	100	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	<20.0	20.0	09/03/2014	ND	188	94.0	200	5.33	
DRO >C10-C28	<20.0	20.0	09/03/2014	ND	248	124	200	7.56	

Surrogate: 1-Chlorooctane 134 % 65.2-140

Surrogate: 1-Chlorooctadecane 145 % 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: 08/29/2014  
Reported: 09/08/2014  
Project Name: MLMU #244  
Project Number: OXY  
Project Location: EUNICE, NM

Sampling Date: 08/29/2014  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: SP 1 @ 6 (H402686-07)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	496	16.0	09/04/2014	ND	400	100	400	0.00	

**Sample ID: SP 2 @ SURFACE (H402686-08)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	576	16.0	09/04/2014	ND	400	100	400	0.00	

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: 08/29/2014  
Reported: 09/08/2014  
Project Name: MLMU #244  
Project Number: OXY  
Project Location: EUNICE, NM

Sampling Date: 08/29/2014  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: SP 2 @ 1' (H402686-09)**

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	09/04/2014	ND	1.87	93.5	2.00	7.35	
Toluene*	<0.050	0.050	09/04/2014	ND	1.73	86.6	2.00	7.36	
Ethylbenzene*	<0.050	0.050	09/04/2014	ND	1.63	81.7	2.00	7.18	
Total Xylenes*	<0.150	0.150	09/04/2014	ND	4.95	82.4	6.00	6.76	
Total BTX	<0.300	0.300	09/04/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 101 % 89.4-126

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	720	16.0	09/08/2014	ND	400	100	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	<20.0	20.0	09/03/2014	ND	188	94.0	200	5.33	
DRO >C10-C28	<20.0	20.0	09/03/2014	ND	248	124	200	7.56	

Surrogate: 1-Chlorooctane 134 % 65.2-140

Surrogate: 1-Chlorooctadecane 143 % 63.6-154

**Sample ID: SP 2 @ 2' (H402686-10)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	800	16.0	09/08/2014	ND	400	100	400	0.00	

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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: 08/29/2014  
Reported: 09/08/2014  
Project Name: MLMU #244  
Project Number: OXY  
Project Location: EUNICE, NM

Sampling Date: 08/29/2014  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: SP 2 @ 3' (H402686-11)**

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	09/04/2014	ND	1.87	93.5	2.00	7.35	
Toluene*	<0.050	0.050	09/04/2014	ND	1.73	86.6	2.00	7.36	
Ethylbenzene*	<0.050	0.050	09/04/2014	ND	1.63	81.7	2.00	7.18	
Total Xylenes*	<0.150	0.150	09/04/2014	ND	4.95	82.4	6.00	6.76	
Total BTX	<0.300	0.300	09/04/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 101 % 89.4-126

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	704	16.0	09/08/2014	ND	400	100	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	<10.0	10.0	09/05/2014	ND	188	94.0	200	5.33	
DRO >C10-C28	107	10.0	09/05/2014	ND	248	124	200	7.56	

Surrogate: 1-Chlorooctane 71.0 % 65.2-140

Surrogate: 1-Chlorooctadecane 113 % 63.6-154

**Sample ID: SP 2 @ 4' (H402686-12)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	720	16.0	09/08/2014	ND	400	100	400	0.00	

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: 08/29/2014  
Reported: 09/08/2014  
Project Name: MLMU #244  
Project Number: OXY  
Project Location: EUNICE, NM

Sampling Date: 08/29/2014  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: SP 2 @ 5' (H402686-13)**

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	09/04/2014	ND	1.87	93.5	2.00	7.35	
Toluene*	<0.050	0.050	09/04/2014	ND	1.73	86.6	2.00	7.36	
Ethylbenzene*	<0.050	0.050	09/04/2014	ND	1.63	81.7	2.00	7.18	
Total Xylenes*	<0.150	0.150	09/04/2014	ND	4.95	82.4	6.00	6.76	
Total BTX	<0.300	0.300	09/04/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 101 % 89.4-126

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	448	16.0	09/08/2014	ND	400	100	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	<10.0	10.0	09/05/2014	ND	188	94.0	200	5.33	
DRO >C10-C28	262	10.0	09/05/2014	ND	248	124	200	7.56	

Surrogate: 1-Chlorooctane 82.6 % 65.2-140

Surrogate: 1-Chlorooctadecane 91.7 % 63.6-154

**Sample ID: SP 2 @ 6' (H402686-14)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	848	16.0	09/08/2014	ND	400	100	400	0.00	

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\*=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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---

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**

1082

**BILL TO**

**ANALYSIS REQUEST**

Company Name: BBC International, Inc.		P.O. #:															
Project Manager: Cliff Brunson		Company:															
Address: P.O. Box 805		Attn:															
City: Hobbs		State: NM Zip: 88241															
Phone #: 575-397-6388		Fax #: 575-397-0397															
Project #:		Project Owner: OXY															
Project Name: MAIN 244		City:															
Project Location: FENCE		State: Zip:															
Sample Name: PRE SWAB		Phone #:															
FOR LAB USE ONLY		Fax #:															
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	TPH	BTEX	
HA00486	5010 surface		61										8/24/14	750			
	29101		61										8/24/14	800			
	29102		61										8/24/14	810			
	39103		61										8/24/14	820			
	49104		61										8/24/14	830			
	59105		61										8/24/14	840			
	69106		61										8/24/14	850			
Relinquished By: [Signature]		Date: 8/24/14		Received By: [Signature]		Date: 8/24/14		Time: 1:00		Sample Condition: Cool Intact		CHECKED BY: [Signature]		Phone Result: [ ] Yes [ ] No		Add'l Phone #: [ ]	
Relinquished By: [Signature]		Date: 8/24/14		Received By: [Signature]		Date: 8/24/14		Time: 4:15		Sample Condition: Cool Intact		CHECKED BY: [Signature]		Phone Result: [ ] Yes [ ] No		Add'l Phone #: [ ]	
Delivered By: (Circle One)		Date: 8/24/14		Received By: [Signature]		Date: 8/24/14		Time: 5:40		Sample Condition: Cool Intact		CHECKED BY: [Signature]		Phone Result: [ ] Yes [ ] No		Add'l Phone #: [ ]	
Sampler - UPS - Bus - Other:		Date: 8/24/14		Received By: [Signature]		Date: 8/24/14		Time: 5:40		Sample Condition: Cool Intact		CHECKED BY: [Signature]		Phone Result: [ ] Yes [ ] No		Add'l Phone #: [ ]	





# CARDINAL LABORATORIES

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

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

2082

Company Name: BBC International, Inc.		P.O. #:		BILL TO												ANALYSIS REQUEST																															
Project Manager: Cliff Brunson		Company:																																													
Address: P.O. Box 805		City:																																													
City: Hobbs		State: NM		Zip: 88241																																											
Phone #: 575-397-6388		Fax #: 575-397-0397		Address:																																											
Project #:		Project Owner: OR		City:																																											
Project Name: ALM 244		State:		Zip:																																											
Project Location: Bunker		Phone #:																																													
Sample Name: Post Bunker		Fax #:																																													
FOR LAB 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		CL		TPH		BTEX													
H402686		575-0586		6		6		6		6		6		6		6		6		6		6		6		8/14		9:00		✓		✓															
8		575-0586		6		6		6		6		6		6		6		6		6		6		6		8/14		9:00		✓		✓															
9		575-0586		6		6		6		6		6		6		6		6		6		6		6		8/14		9:00		✓		✓															
10		575-0586		6		6		6		6		6		6		6		6		6		6		6		8/14		9:00		✓		✓															
11		575-0586		6		6		6		6		6		6		6		6		6		6		6		8/14		9:00		✓		✓															
12		575-0586		6		6		6		6		6		6		6		6		6		6		6		8/14		9:00		✓		✓															
13		575-0586		6		6		6		6		6		6		6		6		6		6		6		8/14		9:00		✓		✓															
14		575-0586		6		6		6		6		6		6		6		6		6		6		6		8/14		9:00		✓		✓															
Relinquished By:		Date: 8/14		Time: 1:00		Received By:		Date: 8/14		Time: 1:00		Sample Condition		Cool		Intact		Checked By:		Date: 8/14		Time: 1:00		Phone Result:		Fax Result:		Add'l Phone #:		Add'l Fax #:																	
Relinquished By: [Signature]		Date: 8/14		Time: 1:00		Received By: [Signature]		Date: 8/14		Time: 1:00		Sample Condition		Cool		Intact		Checked By: [Signature]		Date: 8/14		Time: 1:00		Phone Result:		Fax Result:		Add'l Phone #:		Add'l Fax #:																	
Delivered By: (Circle One)		Sampler - UPS		Bus		Other:		542		544		544		544		544		544		544		544		544		544		544		544		544															

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



## Kathy Purvis

---

**From:** Jennifer Gilkey <jgilkey@bbcinternational.com>  
**Sent:** Wednesday, October 22, 2014 12:08 PM  
**To:** Kathy Purvis  
**Subject:** FW: OXY - MLMU #244 - Remediation Plan

\*\*\*\*\*

### *Jennifer Gilkey*

#### **Administrative Manager**

BBC International, Inc.

Phone: (575) 397-6388

Fax: (575) 397-0397

E-mail: [jgilkey@bbcinternational.com](mailto:jgilkey@bbcinternational.com)

1324 W. Marland Blvd.

Hobbs, NM 88240

\*\*\*\*\*

---

**From:** Oberding, Tomas, EMNRD [<mailto:Tomas.Oberding@state.nm.us>]  
**Sent:** Tuesday, October 21, 2014 1:07 PM  
**To:** Cliff P. Brunson; Hughes, Solomon  
**Cc:** C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** RE: OXY - MLMU #244 - Remediation Plan

Aloha everyone,

I would like to make a clarification regarding the following statement-

“While OCD would like to see all contaminant removed a liner in difficult circumstance is approved”

Mea culpa mea culpa mea maxima culpa, that was meant to say in an ideal world and from a personal NON OCD perspective. It in no way reflects OCD policy or proposed policy.

Again thank you all for your hard work and diligence, and I appreciate the leeway.

Mahalo

-Doc

Tomáš 'Doc' Oberding, PhD  
Environmental Specialist – New Mexico Oil Conservation Division  
Energy, Minerals and Natural Resources Department  
1625 N. French Dr.  
Hobbs, NM 88240  
(O): (575) 393-6161 ext 111  
(C): 575-370-3180  
(F): (575) 393-0720  
E-Mail: [tomas.oberding@state.nm.us](mailto:tomas.oberding@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>

---

**From:** Oberding, Tomas, EMNRD  
**Sent:** Monday, October 20, 2014 2:11 PM  
**To:** 'Cliff P. Brunson'; Hughes, Solomon

**Cc:** C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** RE: OXY - MLMU #244 - Remediation Plan

Aloha Mr Brunson, Mr Hughes et al,

Thank you for sending this proposal.

Based on the sample results provided OCD grants conditional approval. While OCD would like to see all contaminant removed a liner in difficult circumstance is approved.

Please note this approval is conditional, and contingent upon concurrence and approval from the BLM.

I appreciate your hard work.

Have a safe afternoon and week everyone.

Mahalo

-Doc

Tomáš 'Doc' Oberding, PhD  
Environmental Specialist – New Mexico Oil Conservation Division  
Energy, Minerals and Natural Resources Department  
1625 N. French Dr.  
Hobbs, NM 88240  
(O): (575) 393-6161 ext 111  
(C): 575-370-3180  
(F): (575) 393-0720  
E-Mail: [tomas.oberding@state.nm.us](mailto:tomas.oberding@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>

---

**From:** Cliff P. Brunson [<mailto:cbrunson@bbcinternational.com>]  
**Sent:** Monday, October 20, 2014 12:22 PM  
**To:** Oberding, Tomas, EMNRD; Hughes, Solomon  
**Cc:** C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** OXY - MLMU #244 - Remediation Plan

Tomas and Sol:

Tomas, this e-mail is to confirm our conversation on September 22, 2014 about the remediation plan for the above referenced site. I have attached the materials that we used in our discussion. The agreed upon remediation plan is on the first page of the attachment along with the RP number per your previous request. This site is a State and Federal jurisdiction location.

Sol, if you would please review and add your approval, I would be appreciate it. I hope this format meets both of your expectations.

If both of you gentlemen 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:

## Kathy Purvis

---

**From:** Ken Swinney <kswinney@bbcinternational.com>  
**Sent:** Wednesday, October 22, 2014 1:01 PM  
**To:** Kathy Purvis  
**Subject:** FW: OXY - MLMU #244 - Remediation Plan

**From:** Hughes, Solomon [<mailto:shughes@blm.gov>]  
**Sent:** Tuesday, October 21, 2014 8:23 AM  
**To:** Oberding, Tomas, EMNRD  
**Cc:** Cliff P. Brunson; C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** Re: OXY - MLMU #244 - Remediation Plan

Mr. Brunson,

I am in agreement with Tomas, please, try to do the 5-ft excavation and avoid the liner, if possible. Otherwise, this plan is approved as written.

Bests,  
Sol

### Sol Hughes

Environmental Protection Division  
Bureau of Land Management  
620 E. Greene St  
Carlsbad, NM

Office: 575.234.5951  
Cell: 575.499.3378

On Mon, Oct 20, 2014 at 2:11 PM, Oberding, Tomas, EMNRD <[Tomas.Oberding@state.nm.us](mailto:Tomas.Oberding@state.nm.us)> wrote:

Aloha Mr Brunson, Mr Hughes et al,

Thank you for sending this proposal.

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I appreciate your hard work.

Have a safe afternoon and week everyone.

Mahalo

-Doc

Tomáš 'Doc' Oberding, PhD

Environmental Specialist – New Mexico Oil Conservation Division

Energy, Minerals and Natural Resources Department

1625 N. French Dr.

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(O): (575) 393-6161 ext 111

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E-Mail: [tomas.oberding@state.nm.us](mailto:tomas.oberding@state.nm.us)

Website: <http://www.emnrd.state.nm.us/ocd/>

---

**From:** Cliff P. Brunson [mailto:[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)]

**Sent:** Monday, October 20, 2014 12:22 PM

**To:** Oberding, Tomas, EMNRD; Hughes, Solomon

**Cc:** C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis

**Subject:** OXY - MLMU #244 - Remediation Plan

Tomas and Sol:

Tomas, this e-mail is to confirm our conversation on September 22, 2014 about the remediation plan for the above referenced site. I have attached the materials that we used in our discussion. The agreed upon remediation plan is on the first page of the attachment along with the RP number per your previous request. This site is a State and Federal jurisdiction location.



Sol, if you would please review and add your approval, I would be appreciate it. I hope this format meets both of your expectations.

If both of you gentlemen 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](mailto:cbrunson@bbcinternational.com)

\*\*\*\*\*

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