OXY USA, Inc. Cotton Draw Unit #10 Delineation Report and Work Plan

Section 16, T25S, R32E Lea County, New Mexico

April 23, 2014



Prepared for:

OXY USA, Inc. 1017 W Stanolind Road Hobbs, New Mexico 88240

By:

Safety & Environmental Solutions, Inc. 703 East Clinton Street Hobbs, New Mexico 88240 (575) 397-0510

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I. Company Contacts

Representative	Company	Telephone	E-mail
Austin Tramell	OXY USA, INC.	575-499-4919	Austin_Tramell@oxy.com
Bob Allen	SESI	575-397-0510	ballen@sesi-nm.com

II. Background

Safety and Environmental Solutions, Inc. (SESI) was engaged by OXY USA, INC to perform site assessment of a release area at the Cotton Draw Unit #10 located in Section 16 of Township 25 South, Range 32 East, Lea County, New Mexico.

According to the C-141 dated April 01, 2014 the cause of release was internal corrosion of a 2" steel production flow line.

III. Surface and Ground Water

The nearest groundwater of record is approximately 7.8 miles north of the site. The New Mexico Office of State Engineer record is in Section 05 Range 32 East and Township 24 South. The reported depth was 380 feet below ground surface (BGS).

IV. Characterization

The target cleanup levels are determined using the *Guidelines for Remediation of Leaks, Spills and Releases* published by the NMOCD (August 13, 1993). Based on the ranking criteria presented below, the applicable Recommended Remediation Action Levels (RRAL) are 10 parts per million (ppm) Benzene, 50 ppm combined benzene, toluene, ethylbenzene, and total xylenes (BTEX), and 5,000 ppm Total Petroleum Hydrocarbons (TPH).

Depth to Ground Water:										
(Vertical distance from contaminants to	Less than 50 feet	20 points								
seasonal high water elevation of	50 feet to 99 feet	10 points								
groundwater)	>100 feet	0 points	X							
Wellhead Protection Area:										
(Less than 200 feet from a private domestic	Yes	20 points								
water source; or less than 1000 feet from all	No	0 points	X							
other water sources)										
Distance to Surface Water:										
(Horizontal distance to perennial lakes,	Less than 200 feet	20 points								
ponds, rivers, streams, creeks, irrigation	200 feet to 1000 feet	10 points								
canals and ditches)	>1000 feet	0 points	X							
RANKING SCORE (TOTAL POINTS)			0							

V. Work Performed

On April 3, 2014 SESI was onsite to perform a site assessment. The release area was mapped utilizing a Trimble Juno 3D and site photos were taken.

On April 21, 2014, SESI was onsite to determine vertical extent of contamination using a hand auger to collect samples. SP-1 was taken at the surface and at a depth of 1'

where a hard caliche layer was encountered. Samples were taken at SP-2 at surface and at 1' ft., 2' ft. and 2.5 ft. A hard layer of caliche was encountered the depth of 2.5 ft. Samples were taken at SP-3 at the surface and at 1' ft., 2 ft. and, 2.5 ft. where a hard layer of caliche was encountered. All samples were properly packaged, preserved and transported to Cardinal Laboratories, Hobbs New Mexico and analyzed for Chloride (Cl⁻) (Method SM4500Cl-B). The results of the analysis are presented in the table below:

Lab ID	Sample ID	CI (mg/kg)
Analysis Date:	-	
5-1-2014	Sample Pt 1 @ Surface	20800
5-1-2014	Sample Pt 1 @ 1' BGS	3640
5-1-2014	Sample Pt 2 @ Surface	36800
5-1-2014	Sample Pt 2 @ 1' BGS	1070
5-1-2014	Sample Pt 2 @ 2' BGS	2320
5-1-2014	Sample Pt 2 @ 2'6" BGS	8480
5-1-2014	Sample Pt 3 @ Surface	14700
5-1-2014	Sample Pt 3 @ 1' BGS	3800
5-1-2014	Sample Pt 3 @ 2' BGS	11600
5-1-2014	Sample Pt 3 @ 2'6" BS	12000

On April 22, 2014, SESI, along with Custom Welding were on site to install (4) four test trenches to determine further contamination. Test Trenches samples were taken at 1 ft., 4ft., 5ft and 6 ft. away from the pipelines. A hard layer of caliche was encountered at the 6 ft. All samples were properly packaged, preserved and transported to Cardinal Laboratories, Hobbs New Mexico and analyzed for Chloride (Cl⁻) (Method SM4500Cl-B). The results of the analysis are presented in the table below:

Lab ID	Sample ID	CI (mg/kg)
Analysis Date:	-	
5-1-2014	TT-1 @ 3'	2960
5-1-2014	TT-1 @ 4'	528
5-1-2014	TT-1 @ 5'	2200
5-1-2014	TT-1 @ 6'	1500

VI. Action Plan

Due to the extreme depth to groundwater and the hard caliche layer encountered at 2.5 ft. BGS, the following action plan is proposed:

- 1. All contaminated soil with a chloride concentration over 1,500 PPM will be removed and transported to an approved NMOCD facility for disposal.
- 2. The excavated area will be backfilled with native soil and returned to natural grade.
- 3. No further action is necessary.

VII. Figures & Appendices

Figure 1 – Vicinity Map

Figure 2 – Site Plan

Figure 3 – NMOCD Trend Map

Appendix A – Analytical Results Appendix B – C-141

Figure 1 Vicinity Map

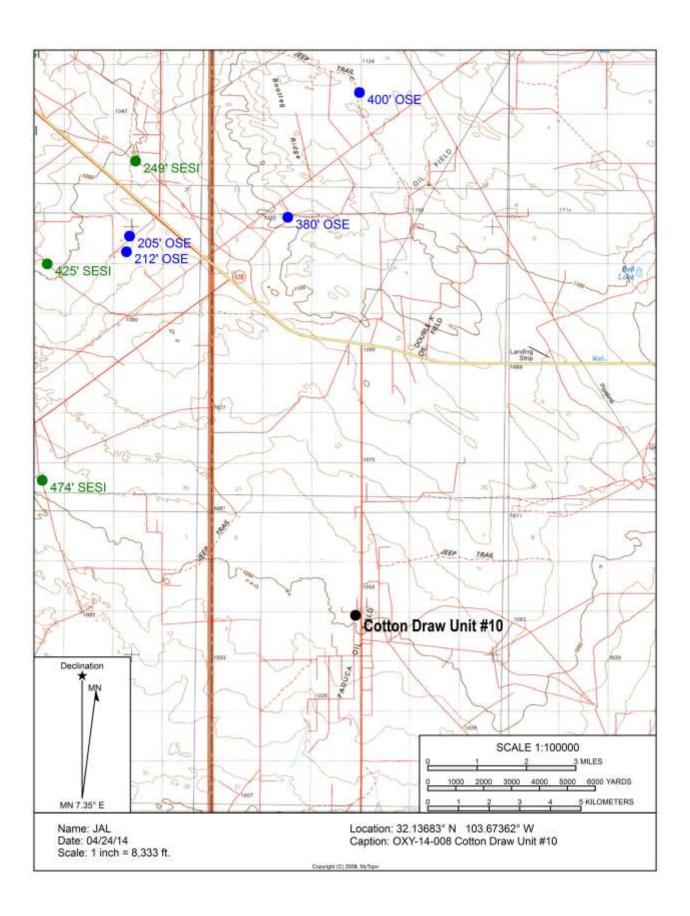


Figure 2 Site Plan



OXY-14-008 Cotton Draw Unit #10

Figure 3 NMOCD Trend Map



NMOCD Trend Map

Appendix A Analytical Results



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

May 01, 2014

Bob Allen

Safety & Environmental Solutions

703 East Clinton

Hobbs, NM 88240

RE: COTTONDRAW UNIT 10

Enclosed are the results of analyses for samples received by the laboratory on 05/01/14 8:15.

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/ga/lab_accredited-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 D. Keine

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

Page 1 of 7



Analytical Results For:

Safety & Environmental Solutions Bob Allen 703 East Clinton Hobbs NM, 88240 Fax To: (575) 393-4388

 Received:
 05/01/2014

 Reported:
 05/01/2014

 Project Name:
 COTTONDRAW UNIT 10

mg/kg

Reporting Limit

16.0

Result

1070

Project Number: OXY-14-008

Project Number: OXY-14-00 Project Location: C1 Sampling Date: 04/21/2014 Sampling Type: Soil

Sampling Condition: ** (See Notes)
Sample Received By: Celey D. Keene

Sample ID: SAMPLE PT 1 @ SURFACE (H401318-01)

Chloride, SM4500CI-B	mg	mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analysed	Method Slank	BS	% Recovery	True Value QC	RPD	Qualifie
Chloride	20800	16.0	05/01/2014	ND	416	104	400	3.92	
Sample ID: SAMPLE PT 1	@ 1' BGS (H40	01318-02)							
Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	85	% Recovery	True Value QC	RPD	Qualifie
Chloride	3640	16.0	05/01/2014	ND	416	104	400	3.92	
Sample ID: SAMPLE PT 2	@ SURFACE (I	1401318-03)							
	mg	/kg	Analyze	d By: AP					
Chloride, SM4500CI-B									
Chloride, SM4500CI-B Analyte	Result	Reporting Limit	Analyzed	Method Slank	85	% Recovery	True Value QC	RPD	Qualifie

Analyzed By: AP

Method Blank

ND

85

416

% Recovery

104

True Value QC

400

RPD

3,92

Qualifier

Analyzed

05/01/2014

Cardinal Laboratories "=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Chloride, SM4500CI-B

Chloride

Analyte

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Analytical Results For:

Safety & Environmental Solutions Bob Allen 703 East Clinton Hobbs NM, 88240 Fax To: (575) 393-4388

 Received:
 05/01/2014

 Reported:
 05/01/2014

 Project Name:
 COTTONDRAW UNIT 10

Project Number: OXY-14-008
Project Location: C1

Sampling Date: 04/21/2014 Sampling Type: Soil

Sampling Condition: ** (See Notes)
Sample Received By: Celey D. Keene

Sample ID: SAMPLE PT 2 @ 2' BGS (H401318-05)

Chloride, SM4500CI-B	mg	mg/kg		d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifie
Chloride	2320	16.0	05/01/2014	ND	416	104	400	3.92	
Sample ID: SAMPLE PT 2	2 @ 2'6" BGS (H	(401318-06)							
Chloride, SM4500CI-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Stank	BS	% Recovery	True Value QC	RPD	Qualifie
Chloride	8480	16.0	05/01/2014	ND	416	104	400	3.92	
Sample ID: SAMPLE PT 3 Chloride, SM4500Cl-8		1401318-07) /kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifie
Chloride	14700	16.0	05/01/2014	ND	416	104	400	3.92	
Sample ID: SAMPLE PT 3	8 @ 1' BGS (H46	01318-08)							
Chloride, SM4500CI-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifie
Chloride	3800	16.0	05/01/2014	ND	416	104	400	3.92	
Sample ID: SAMPLE PT 3	8 @ 2' BGS (H46	01318-09)							
Chloride, SM4500CI-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifie
Chloride	11600	16.0	05/01/2014	ND	416	104	400	3.92	

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Celey D. Keene, Lab Director/Quality Manager

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Analytical Results For:

Safety & Environmental Solutions Bob Allen 703 East Clinton Hobbs NM, 88240

Fax To: (575) 393-4388

Received: 05/01/2014 Sampling Date: 04/21/2014 Sampling Type: 05/01/2014 Reported: Soil COTTONDRAW UNIT 10 ++ (See Notes) Sampling Condition: Project Name: Project Number: OXY-14-008 Sample Received By: Celey D. Keene

Project Location: C1

Sample ID: SAMPLE PT 3 @ 2'6" BGS (H401318-10)

Chloride, SM4500CI-B	mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Hethod Blank	85	% Recovery	True Value QC	RPD	Qualifier
Chloride	12000	16.0	05/01/2014	ND	416	104	400	3.92	

Sample ID: TT-1 @ 3' BGS (H401318-11)

Chloride, SM4500CI-B	mg	/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Hethod Blenk	85	% Recovery	True Value QC	RPD	Qualifier
Chloride	2960	16.0	05/01/2014	ND	416	104	400	3.92	

Sample ID: TT-1 @ 4' BGS (H401318-12)

Chloride, SM4500Cl-B	mg/kg		Analyze	Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Hethod Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	528	16.0	05/01/2014	ND	416	104	400	3.92	

Sample ID: TT-1 @ 5' BGS (H401318-13)

Chloride, SM4500CI-B	mg	/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Hethod Blank	85	% Recovery	True Value QC	RPD	Qualifier
Chloride	2200	16.0	05/01/2014	ND	416	104	400	3.92	

Sample ID: TT-1 @ 6' BGS (H401318-14)

Chloride, SM4500Cl-B	mg	/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	85	% Recovery	True Value QC	RPD	Qualifier
Chloride	1500	16.0	05/01/2014	ND	416	104	400	3.92	

Cardinal Laboratories

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Celey D. Keene, Lab Director/Quality Manager

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Notes and Definitions

(D	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 SM4500CH5 does not require samples be received at or below 6°C
	Sampler remoted on an an expelled basis (web) unless otherwise noted on report

Cardinal Laboratories *=Accredited Analyte

NUMC 60701 1888s and Samples. Caching's building and lifestly and life

Celeg & Keine

Celey D. Keene, Lab Director/Quality Manager

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Company Name Sa	100	ARDIN	B)
faty & Engironmental Solutions	16) 193-2126 Fax (506) 393-2476		

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 83240 (686) 393-2326 Fax (585) 393-2476	3-2476			Prope of Z
mpany Name: Safety & Environmental Solutions, Inc.	al Solutions, Inc.	Вицего		8
ojust Manager: Bob Allon		100年		
dress: 703 East Clinton		Germany, Same		
Hohbs Suu: NM	M 23p: 88240	Attru		
one #: 575-397-0510 Fax #: 5		Addiness:		
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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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Project Manager:	Boh Allen	The state of the s	#10/#	
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Caty	Holibs State: NM	State: NM ZIp: 88240	Attru	
Phone #:	7-0510 +	575-393-4388	Address	
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Appendix B C-141

District I 1625 N. French Dr., Hobbs, NM 88240 State of New Mexico Form C-141 Energy Minerals and Natural Resources Revised August 8, 2011 811 S. First St., Artesia, NM 88210 District III Oil Conservation Division Submit I Copy to appropriate District Office in 1000 Rio Brazos Road, Aztec, NM 87410 accordance with 19.15.29 NMAC. District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505 1220 South St. Francis Dr. Santa Fe, NM 87505 Release Notification and Corrective Action OPERATOR Final Report Name of Company Oxy USA Inc. Contact Austin Tramell Address 1017 W Stanolind Road Telephone No. 575-499-4919 Facility Name Cotton Draw Unit 10 Facility Type Well location Surface Owner BLM Mineral Owner API No. 30-025-08195 LOCATION OF RELEASE Unit Letter Section Township East/West Line Range Feet from the North/South Line | Feet from the County 258 16 32E 660 660 Lea Latitude_32.13683°____Longitude_-103.67362°_ NATURE OF RELEASE Type of Release Produced Water Volume of Release 35BBL Volume Recovered 30BBL Source of Release 2" steel production line due to internal corrosion Date and Hour of Occurrence Date and Hour of Discovery 04/01/2014 @ 2:00 PM Was Immediate Notice Given? If YES, To Whom? Yes □ No □ Not Required Geoffrey Leking NMOCD, Jennifer Van Curen BLM By Whom? Austin Tramell Date and Hour 04/02/2014 @02:37 PM Was a Watercourse Reached? If YES, Volume Impacting the Watercourse. Yes No No If a Watercourse was Impacted, Describe Fully.* Describe Cause of Problem and Remedial Action Taken.* Internal corrosion on a 2" steel production flow line cause 35 bbls of produced water to leak onto the ground. 30 bbls of fluid was recovered and well was shut in. Describe Area Affected and Cleanup Action Taken.* The affected area is approximately 18'x40'. Remediation will be completed in accordance with an approved remediation plan from 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 segulations OIL CONSERVATION DIVISION Signature: Approved by Environmental Specialist: Printed Name: Austin Tramell Title: HES Specialist Approval Date: Expiration Date: E-mail Address: Austin_tramell@oxy.com Conditions of Approval: Attached 04/14/2014 Phone: 575-499-4919 * Attach Additional Sheets If Necessary

Appendix C Site Photographs



Photo #1 – East of fence line facing west



Photo #2 – West of fence line facing west



Photo #3 – Release Point



Photo #4 – Spill area facing east



Photo #5 - Spill are facing north east end



Photo #6 – Spill area facing north West end



Photo #7 – Spill area facing south west end



Photo #8 – Spill are facing south east end



Photo #9 – Bottom of spill area

Appendix D NMOSE Water Column/Average Depth to Water



New Mexico Office of the State Engineer Water Column/Average Depth to Water

(A CLW#### in the POD suffix indicates the POD has been replaced & no longer serves a (R=POD has been replaced, O=orphaned,

C=the file is

(quarters are 1=NW 2=NE 3=SW 4=SE)

water right file.) closed) (quarters are smallest to largest) (NAD83 UTM in meters)

(In feet)

 POD

 Sub Q Q Q
 Depth Depth Water

 POD Number
 Code basin County 64 16 4 Sec. Tws. Rng
 X
 Y
 Well Water Column

 C 02216
 CUB LE 2 2 4 21 23S 32E 625035 3573261*
 585 400 185

Average Depth to Water: 400 feet

Minimum Depth: 400 feet

Maximum Depth: 400 feet

Record Count: 1

PLSS Search:

Section(s): 21

Township: 23S

Range: 32E

*UTM location was derived from PLSS - see Help

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.

5/15/14 11:43 AM

Page 1 of 1

WATER COLUMN/ AVERAGE DEPTH TO WATER



New Mexico Office of the State Engineer Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced (R=POD has been replaced. O=orphaned,

C=the file is & no longer serves a water right file.) closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest) (NAD83 UTM in meters)

(In feet)

Sub-QQQ Code basin County 64 16 4 Sec Tws Rng POD Number

600 380

Depth Depth Water Well Water Column

C 03555 POD1

LE 2 2 1 05 24S 32E 622709

3569231

Average Depth to Water: 380 feet

Minimum Depth: 380 feet Maximum Depth: 380 feet

Record Count: 1

PLSS Search:

Section(s): 5

Township: 24S

Range: 32E

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.

5/15/14 11:44 AM

Page 1 of 1

WATER COLUMN/ AVERAGE DEPTH TO WATER



New Mexico Office of the State Engineer Water Column/Average Depth to Water

(A CLW#### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced. O=orphaned,

(quarters are 1=NW 2=NE 3=SW 4=SE) C=the file is closed)

(quarters are smallest to largest) (NAD83 UTM in meters)

(In feet)

trater rifler incil	diadeay	f.dom			er court		see Second	from one or	Contract of the contract of th		400,000	75
POD Number	POD Sub- Code basin	County	Q Q 64 16	100		Tws	Rng	x	Y			Water Column
C 02405	С	ED	4	1	02	248	31E	617690	3568631*	275	160	115
C 02460	C	ED		3	02	248	31E	617496	3568022*	320		
C 02460 POD2	С	ED		3	02	245	31E	617496	3568022*	320		
C 02464	C	ED	3 4	1	02	248	31E	617589	3568530*	320	205	115

Average Depth to Water: 182 feet

Minimum Depth: 160 feet

Maximum Depth: 205 feet

Record Count: 4

PLSS Search:

Section(s): 2

Township: 24S

Range: 31E

*UTM location was derived from PLSS - see Help

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.

5/15/14 11:45 AM

Page 1 of 1

WATER COLUMN/ AVERAGE DEPTH TO WATER