

RECEIVED

By JKeyes at 12:09 pm, Nov 25, 2015

Closure Report**APPROVED**

By JKeyes at 12:09 pm, Nov 25, 2015

Site Description

Site Name:	SHU #172 Injection line
Company:	Oxy Permian Ltd.
Legal Description:	NE ¼, Section 9, T19S, R38E
County:	Lea County, NM
GPS Coordinates:	N 32.68019° W 103.147789°

Release Data

Date of Release:	07/11/2015
Type of Release:	Produced water
Source of Release:	Stress/fatigue of a 4" fiberglass injection line
Volume of Release:	150 bbls
Volume Recovered:	0 bbls

Remediation Specifications

Remediation Parameters:	Surface scrape the areas around SP1, SP2, SP3, & SP4. No action is required in the trench area near sample points SP5, SP6, & SP7. Backfill the site with clean soil.	
Remediation Activities:	11/13/2015 to 11/16/2015	
Plan Sent to OCD:	08/17/2015	Email from Cliff Brunson to Kellie Jones
OCD Approval of Plan:	08/18/2015	Email from Kellie Jones to Cliff Brunson
Plan Sent to BLM:	n/a	n/a
BLM Approval of Plan:	n/a	n/a

Supporting Documentation

Initial C-141	Signed 07/16/2015
Final C-141	Signed 11/23/2015
Site Diagram	July 2015
Groundwater Plot	25'-75'
TOPO Maps	July 2015
Lab Summary	07/20/2015
Lab Analysis	07/20/2015
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.

11/25/2015

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	Contact	Tony Aguilar
Address	1017 W. Stanolind Road	Telephone No.	(575) 397-8251
Facility Name	SHU #172 Injection line	Facility Type	Injection
Surface Owner	Mineral Owner	API No.	30-025-28543

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
NE ¼	9	19S	38E					Lea County, NM

Latitude N 32.68019° Longitude W 103.147789°

NATURE OF RELEASE

Type of Release	Produced water	Volume of Release	150 bbls	Volume Recovered	0 bbls
Source of Release	Stress/fatigue of a 4" fiberglass injection line	Date and Hour of Occurrence	07/11/2015	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?	Kellie Jones- NMOCD		
By Whom?	Tony Aguilar, Oxy	Date and Hour	07/11/2015		
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.*

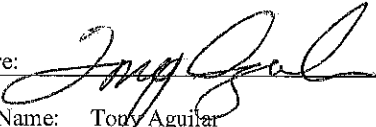
Describe Cause of Problem and Remedial Action Taken.*

Stress or fatigue of a 4" fiberglass injection line caused 150 bbls of produced water to spill onto the ground. No fluids were recovered and the line was repaired or replaced.

Describe Area Affected and Cleanup Action Taken.*

The area affected is approximately 100' x 75' on location to the east of the SHU water injection bldg. and into the trench. Remediation will be completed in accordance with a remediation plan approved by NMOCD.

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: 		OIL CONSERVATION DIVISION	
Printed Name: Tony Aguilar		Approved by Environmental Specialist:	
Title: HES Specialist	Approval Date:	Expiration Date:	
E-mail Address: Raymond_aguilar@oxy.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 7-16-15	Phone: (575) 397-8251		

* Attach Additional Sheets If Necessary

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1625 N. French Dr., Hobbs, NM 88240
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District III
1000 Rio Brazos Road, Aztec, NM 87410
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1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Form C-141
Revised August 8, 2011

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Submit 1 Copy to appropriate District Office in
accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☒ Final Report

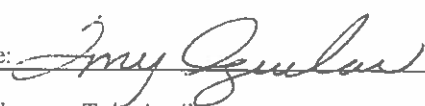
Name of Company	Oxy Permian	Contact	Tony Aguilar
Address	1017 W. Stanolind Road	Telephone No.	(575) 397-8251
Facility Name	SHU #172 Injection line	Facility Type	Injection
Surface Owner	Mineral Owner	API No.	30-025-28543

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
NE ¼	9	19S	38E					Lea County, NM

Latitude N 32.68019° Longitude W 103.147789°

NATURE OF RELEASE

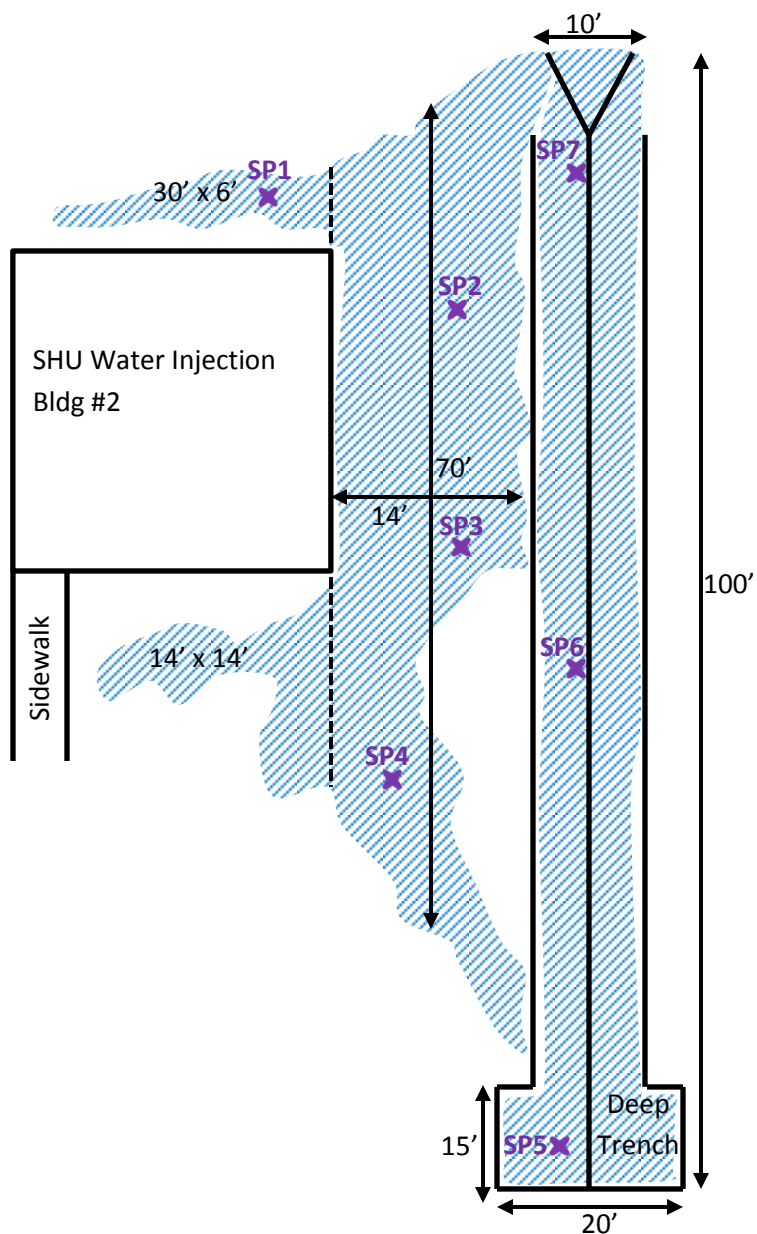
Type of Release	Produced water	Volume of Release	150 bbls	Volume Recovered	0 bbls
Source of Release	Stress/fatigue of a 4" fiberglass injection line	Date and Hour of Occurrence	07/11/2015	Date and Hour of Discovery	
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Kellie Jones- NMOCD		
By Whom?	Tony Aguilar, Oxy	Date and Hour	07/11/2015		
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.*					
Stress or fatigue of a 4" fiberglass injection line caused 150 bbls of produced water to spill onto the ground. No fluids were recovered and the line was repaired or replaced.					
Describe Area Affected and Cleanup Action Taken.*					
The area affected is approximately 100' x 75' on location to the east of the SHU water injection bldg. and into the trench. Remediation was completed in accordance with a remediation plan approved by Kellie Jones of NMOCD via email on 08/18/15.					
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: 		OIL CONSERVATION DIVISION			
Printed Name: Tony Aguilar		Approved by Environmental Specialist:			
Title: HES Specialist		Approval Date:		Expiration Date:	
E-mail Address: Raymond_aguilar@oxy.com		Conditions of Approval:		Attached <input type="checkbox"/>	
Date: 11-23-15		Phone: (575) 397-8251			

* Attach Additional Sheets If Necessary



Oxy

SHU #172 Injection line



NE ¼, Section 9, T19S, R38E

Lea County, NM

N 32.68019° W 103.147789°

API# 30-025-28543

BBC International, Inc.

Oxy

SHU #172 Injection line

Date: 07/15/2015

DRWG by: K. Purvis

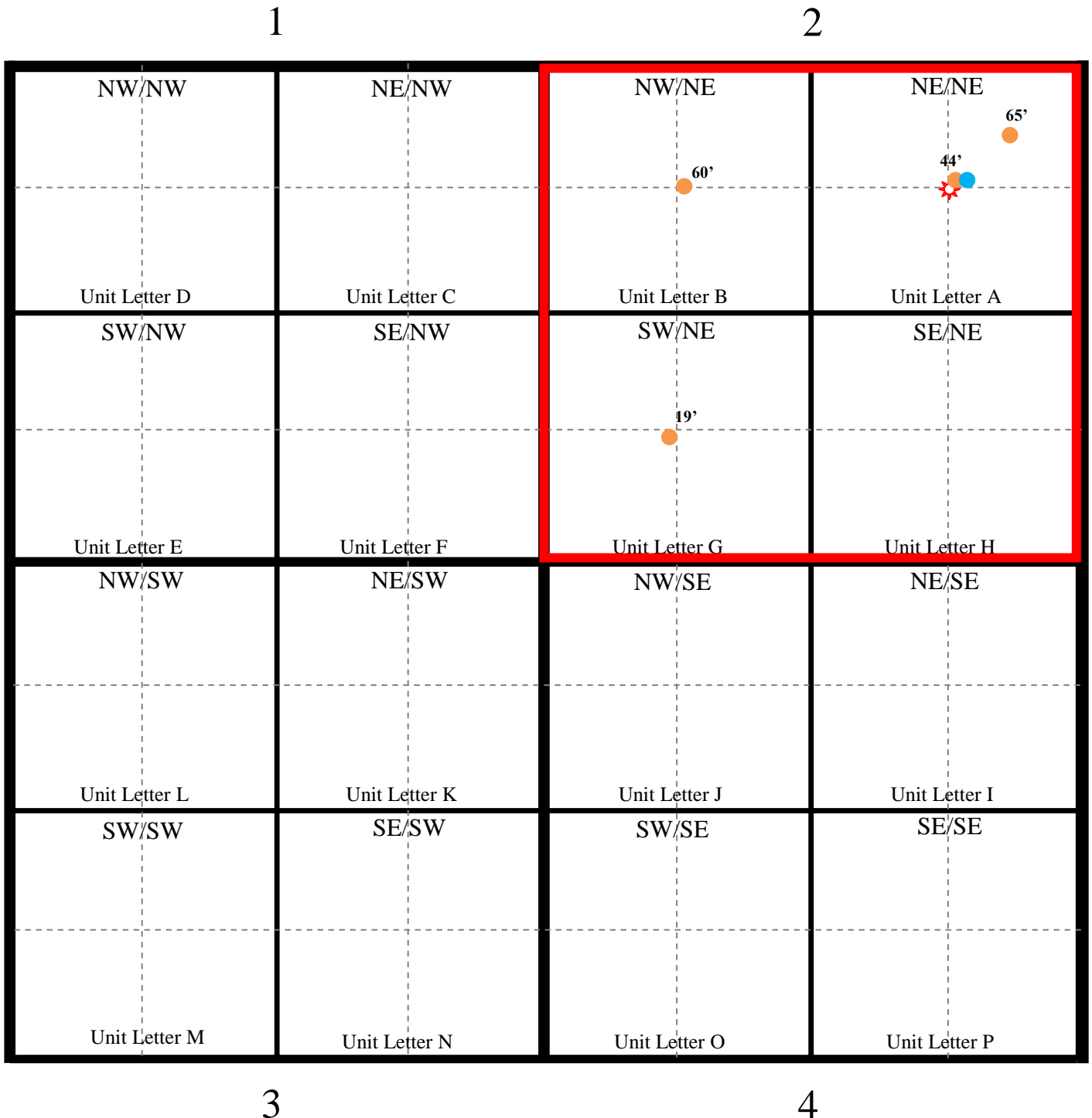
NOT TO SCALE

File: Oxy 2015

Oxy SHU #172 Injection line

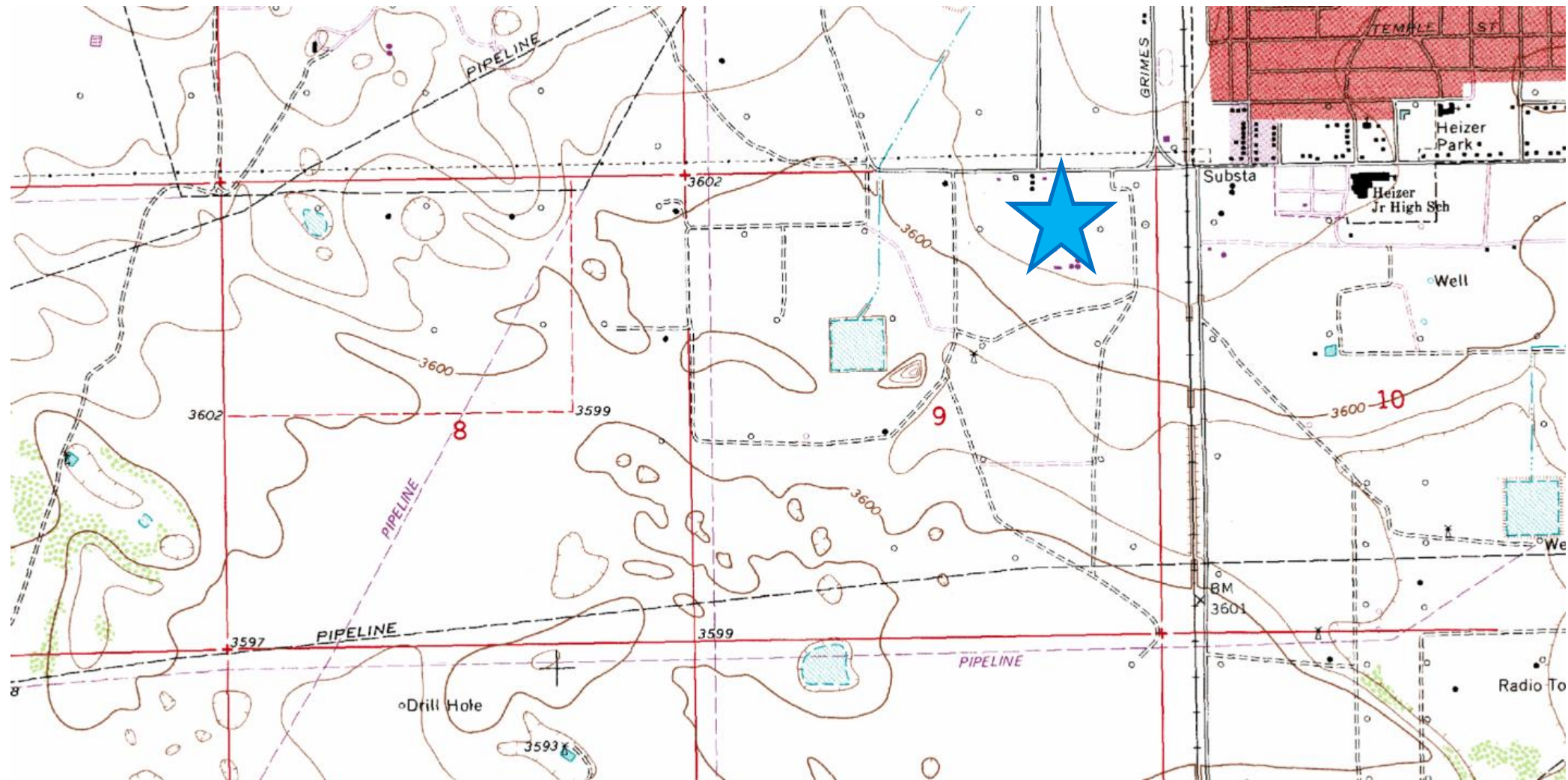
County	Unit Letter	Section	Township	Range
Lea	NW ¼	9	19S	38E

Trend Map 25'-75'



Oxy

SHU #172 Injection line



**Laboratory Analytical Results Summary
SHU #172 Injection Line**

		Sample	SP1 @ SURFACE	SP1 @ 1'
Analyte	Method	Date	7/20/15	7/20/15
			mg/Kg	mg/Kg
Chloride	SM4500Cl-B		1390	<16.0

		Sample	SP2 @ SURFACE	SP2 @ 1'
Analyte	Method	Date	7/20/15	7/20/15
			mg/Kg	mg/Kg
Chloride	SM4500Cl-B		1230	<16.0

		Sample	SP3 @ SURFACE	SP3 @ 1'
Analyte	Method	Date	7/20/15	7/20/15
			mg/Kg	mg/Kg
Chloride	SM4500Cl-B		3440	64

		Sample	SP4 @ SURFACE	SP4 @ 1'
Analyte	Method	Date	7/20/15	7/20/15
			mg/Kg	mg/Kg
Chloride	SM4500Cl-B		720	32

		Sample	SP5 @ 12'	SP5 @ 13'	SP5 @ 14'
Analyte	Method	Date	7/20/15	7/20/15	7/20/15
			mg/Kg	mg/Kg	mg/Kg
Chloride	SM4500Cl-B		624	432	<16.0

		Sample	SP6 @ 12'	SP6 @ 13'	SP6 @ 14'
Analyte	Method	Date	7/20/15	7/20/15	7/20/15
			mg/Kg	mg/Kg	mg/Kg
Chloride	SM4500Cl-B		592	464	32

		Sample	SP7 @ 12'	SP7 @ 13'	SP7 @ 14'
Analyte	Method	Date	7/20/15	7/20/15	7/20/15
			mg/Kg	mg/Kg	mg/Kg
Chloride	SM4500Cl-B		784	496	32



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

July 28, 2015

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: SHU #172

Enclosed are the results of analyses for samples received by the laboratory on 07/21/15 14:00.

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 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: 07/21/2015
Reported: 07/28/2015
Project Name: SHU #172
Project Number: NONE GIVEN
Project Location: HOBBS, NM

Sampling Date: 07/20/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: SP 1 @ SURFACE (H501889-01)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1390	16.0	07/26/2015	ND	416	104	400	3.92	

Sample ID: SP 1 @ 1' (H501889-02)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	07/26/2015	ND	416	104	400	3.92	

Sample ID: SP 2 @ SURFACE (H501889-03)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1230	16.0	07/26/2015	ND	416	104	400	3.92	

Sample ID: SP 2 @ 1' (H501889-04)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	07/26/2015	ND	416	104	400	3.92	

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*=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: 07/21/2015
Reported: 07/28/2015
Project Name: SHU #172
Project Number: NONE GIVEN
Project Location: HOBBS, NM

Sampling Date: 07/20/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: SP 3 @ SURFACE (H501889-05)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	3440	16.0	07/26/2015	ND	416	104	400	3.92		

Sample ID: SP 3 @ 1' (H501889-06)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	07/26/2015	ND	416	104	400	3.92	

Sample ID: SP 4 @ SURFACE (H501889-07)

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	07/26/2015	ND	416	104	400	3.92	

Sample ID: SP 4 @ 1' (H501889-08)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	07/26/2015	ND	416	104	400	3.92	

Sample ID: SP 5 @ 12' (H501889-09)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	624	16.0	07/26/2015	ND	416	104	400	3.92	

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Celey D. Keene, Lab Director/Quality Manager

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

Received: 07/21/2015
Reported: 07/28/2015
Project Name: SHU #172
Project Number: NONE GIVEN
Project Location: HOBBS, NM

Sampling Date: 07/20/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: SP 5 @ 13' (H501889-10)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	432	16.0	07/26/2015	ND	416	104	400	3.92	

Sample ID: SP 5 @ 14' (H501889-11)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	07/26/2015	ND	416	104	400	3.92		

Sample ID: SP 6 @ 12 (H501889-12)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	592	16.0	07/26/2015	ND	416	104	400	3.92	

Sample ID: SP 6 @ 13 (H501889-13)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	464	16.0	07/26/2015	ND	416	104	400	3.92		

Sample ID: SP 6 @ 14 (H501889-14)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	07/28/2015	ND	416	104	400	0.00	

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Celey D. Keene, Lab Director/Quality Manager

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

Received: 07/21/2015
Reported: 07/28/2015
Project Name: SHU #172
Project Number: NONE GIVEN
Project Location: HOBBS, NM

Sampling Date: 07/20/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: SP 7 @ 12' (H501889-15)

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	07/28/2015	ND	416	104	400	0.00	

Sample ID: SP 7 @ 13' (H501889-16)

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	07/28/2015	ND	416	104	400	0.00	

Sample ID: SP 7 @ 14' (H501889-17)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	07/28/2015	ND	416	104	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



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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

2

Page 8 of 8

Kathy Purvis

From: Jones, Kellie, EMNRD <Kellie.Jones@state.nm.us>
Sent: Tuesday, August 18, 2015 10:42 AM
To: Cliff Brunson
Cc: Keyes, Jamie, EMNRD; Oberding, Tomas, EMNRD; Tony Aguilar ; Ken Swinney; Jennifer Gilkey; Kathy Purvis; Groves, Amber
Subject: RE: OXY SHU #172 Injection Line - Remediation Plan
Attachments: Remediation packet, SHU #172 Injection line.pdf

Cliff,

Good morning. The plan is approved with the knowledge that SP5-SP7 will be dealt with once the line is taken out of service.

If you have any questions, please feel free to contact me.

Kellie Jones
Environmental Specialist, District 1
Oil Conservation Division, EMNRD
575-393-6161 ext. 111
575-370-3180 (emergency-cell)
E-Mail: kellie.jones@state.nm.us

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

Please note:

- The OCD is no longer granting "risk-based," or standard closure of events/RPs with remediation deferred to site abandonment/sale/closure. The RP will remain open until such time as historic contamination is addressed.
- Photographic documentation is stipulated for all events involving liquids.

If you have any questions or concerns, and for notification, please contact me.

From: Cliff Brunson [<mailto:cbrunson@bbcinternational.com>]
Sent: Monday, August 17, 2015 2:45 PM
To: Jones, Kellie, EMNRD
Cc: Keyes, Jamie, EMNRD; Oberding, Tomas, EMNRD; Tony Aguilar ; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: OXY SHU #172 Injection Line - Remediation Plan

Kellie,

This e-mail is to confirm our discussion on Friday, August 14, 2015 concerning the remediation plan for the Oxy SHU #172 Injection Line. I have attached the information packet that we used in our discussion with a cover page describing the remediation plan that we agreed upon.

If you would please reply back via e-mail with your concurrence on this 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
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