

Bratcher, Mike, EMNRD

2RP-1874

From: Cliff P. Brunson <cbrunson@bbcinternational.com>
Sent: Wednesday, January 01, 2014 1:28 PM
To: Bratcher, Mike, EMNRD
Cc: C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: OXY-Pure Gold D Federal #17-Remediation Plan
Attachments: Remediation Packet- Pure Gold D-17.pdf

Mike,

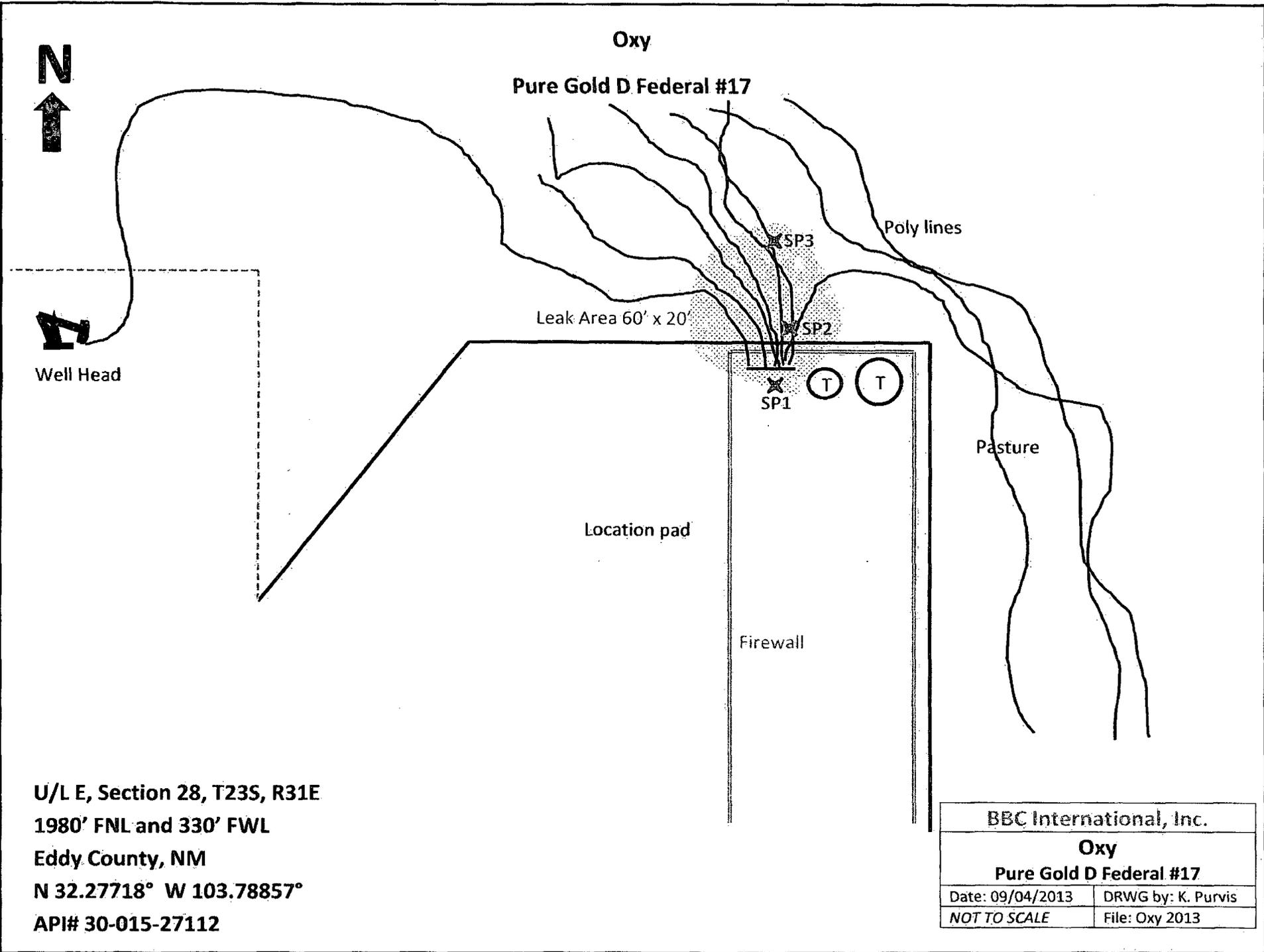
This e-mail is to confirm our conversation on December 18, 2013 about the remediation plan for the above referenced site. I have attached the materials that we used in our discussion. As discussed, Oxy will excavate the entire spill area to a depth of 6 inches by hand. The area will then be backfilled with clean soil.

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.
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U/L E, Section 28, T23S, R31E
 1980' FNL and 330' FWL
 Eddy County, NM
 N 32.27718° W 103.78857°
 API# 30-015-27112

BBC International, Inc.	
Oxy	
Pure Gold D Federal #17	
Date: 09/04/2013	DRWG by: K. Purvis
NOT TO SCALE	File: Oxy 2013



Groundwater Plot

Oxy Pure Gold D Federal #17

County
Eddy

Unit Letter
E

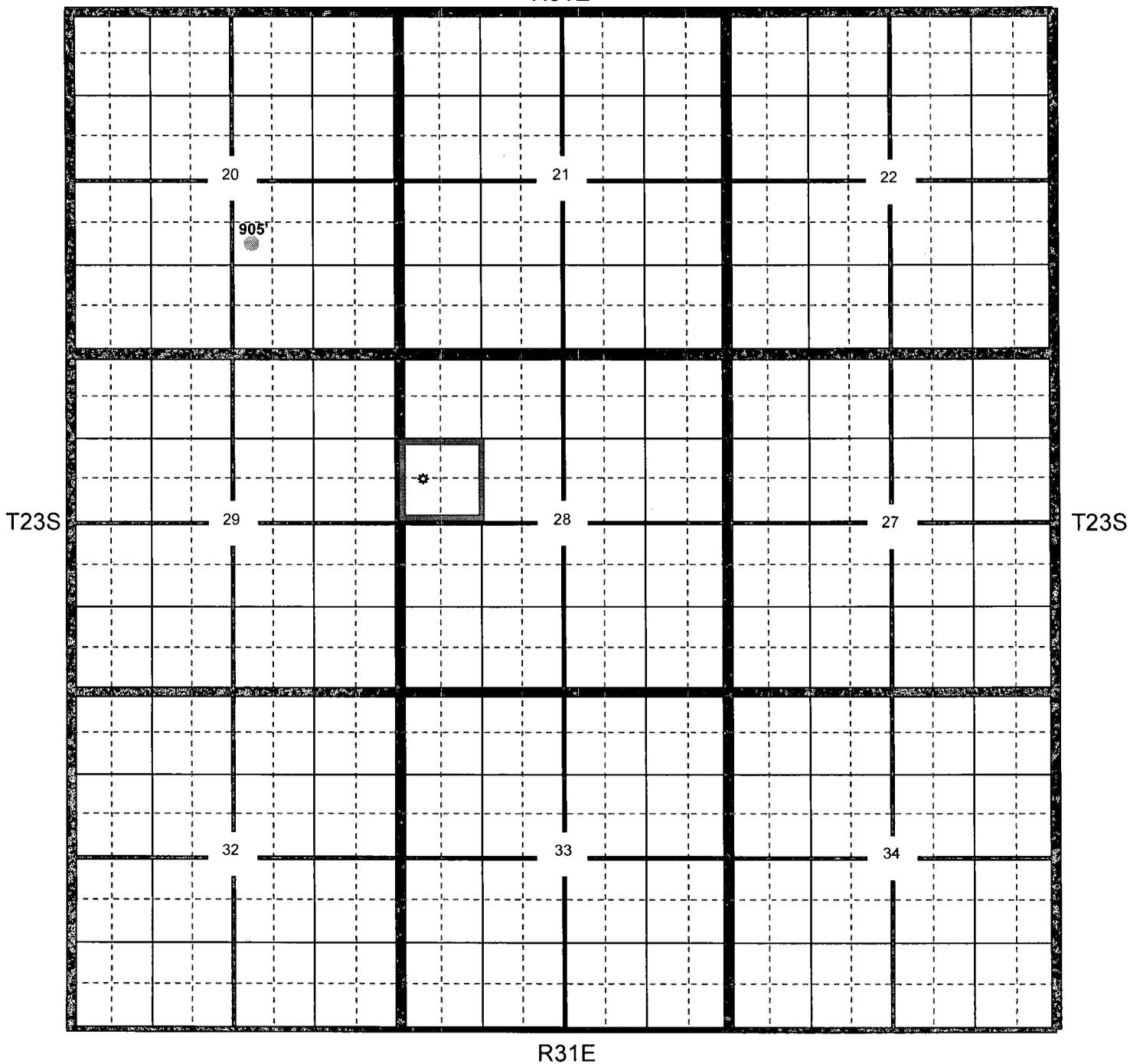
Section
28

Township
23S

Range
31E

Trend Map 200'

R31E



★ Location

● OCD

● USGS

● SEO

● All Databases

Section Quarters

Oxy Pure Gold D Federal #17

County Eddy Unit Letter E Section 28 Township 23S Range 31E

Trend Map 200'

1

2

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

3

4

**Laboratory Analytical Results Summary
Pure Gold D #17**

Analyte	Method	Sample	SP1 @ 1'	SP1 @ 2'
		Date	9/12/13	9/12/13
			mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.050	<0.050
Toluene	BTEX 8021B		0.054	<0.050
Ethylbenzene	BTEX 8021B		<0.050	<0.050
Total Xylenes	BTEX 8021B		<0.150	<0.150
Total BTEX	BTEX 8021B		<0.300	<0.300
Chloride	SM4500CI-B		240	48
GRO	TPH 8015M		<10.0	<10.0
DRO	TPH 8015M		62.6	31.7

Analyte	Method	Sample	SP2 @ 1'	SP2 @ 2'	SP2 @ 3'
		Date	9/12/13	9/12/13	9/12/13
			mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.050	n/a	<0.050
Toluene	BTEX 8021B		<0.050	n/a	<0.050
Ethylbenzene	BTEX 8021B		<0.050	n/a	<0.050
Total Xylenes	BTEX 8021B		<0.150	n/a	<0.150
Total BTEX	BTEX 8021B		<0.300	n/a	<0.300
Chloride	SM4500CI-B		128	64	80
GRO	TPH 8015M		<10.0	n/a	<10.0
DRO	TPH 8015M		<10.0	n/a	<10.0

Analyte	Method	Sample	SP3 @ 1'	SP3 @ 2'	SP3 @ 3'	SP3 @ 4'
		Date	9/12/13	9/12/13	9/12/13	9/12/13
			mg/Kg	mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.050	n/a	n/a	<0.050
Toluene	BTEX 8021B		<0.050	n/a	n/a	<0.050
Ethylbenzene	BTEX 8021B		<0.050	n/a	n/a	<0.050
Total Xylenes	BTEX 8021B		<0.150	n/a	n/a	<0.150
Total BTEX	BTEX 8021B		<0.300	n/a	n/a	<0.300
Chloride	SM4500CI-B		592	224	112	112
GRO	TPH 8015M		<10.0	n/a	n/a	<10.0
DRO	TPH 8015M		<10.0	n/a	n/a	85



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

September 17, 2013

Cliff Brunson
BBC International, Inc.
P.O. Box 805
Hobbs, NM 88241

RE: PURE GOLD D #17

Enclosed are the results of analyses for samples received by the laboratory on 09/13/13 10:50.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/ga/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 fluid and cursive.

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: 09/13/2013
 Reported: 09/17/2013
 Project Name: PURE GOLD D #17
 Project Number: NOT GIVEN
 Project Location: 128

 Sampling Date: 09/12/2013
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: SP 1 @ 1FT (H302214-01)

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	09/17/2013	ND	1.98	99.0	2.00	4.45		
Toluene*	0.054	0.050	09/17/2013	ND	2.14	107	2.00	4.08		
Ethylbenzene*	<0.050	0.050	09/17/2013	ND	2.27	113	2.00	4.29		
Total Xylenes*	<0.150	0.150	09/17/2013	ND	6.92	115	6.00	2.88		
Total BTEX	<0.300	0.300	09/17/2013	ND						

Surrogate: 4-Bromofluorobenzene (PIC) 114 % 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	240	16.0	09/16/2013	ND	432	108	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	09/16/2013	ND	187	93.5	200	7.17		
DRO >C10-C28	62.6	10.0	09/16/2013	ND	163	81.5	200	12.6		

Surrogate: 1-Chlorooctane 86.8 % 65.2-140

Surrogate: 1-Chlorooctadecane 99.3 % 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: 09/13/2013
 Reported: 09/17/2013
 Project Name: PURE GOLD D #17
 Project Number: NOT GIVEN
 Project Location: 128

 Sampling Date: 09/12/2013
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: SP1 @ 2FT (H302214-02)

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	09/17/2013	ND	1.98	99.0	2.00	4.45		
Toluene*	<0.050	0.050	09/17/2013	ND	2.14	107	2.00	4.08		
Ethylbenzene*	<0.050	0.050	09/17/2013	ND	2.27	113	2.00	4.29		
Total Xylenes*	<0.150	0.150	09/17/2013	ND	6.92	115	6.00	2.88		
Total BTEX	<0.300	0.300	09/17/2013	ND						

Surrogate: 4-Bromofluorobenzene (PID) 113 % 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	48.0	16.0	09/16/2013	ND	432	108	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	09/16/2013	ND	187	93.5	200	7.17		
DRO >C10-C28	31.7	10.0	09/16/2013	ND	163	81.5	200	12.6		

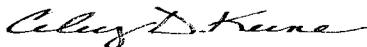
Surrogate: 1-Chlorooctane 90.9 % 65.2-140

Surrogate: 1-Chlorooctadecane 96.5 % 63.6-154

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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:	09/13/2013	Sampling Date:	09/12/2013
Reported:	09/17/2013	Sampling Type:	Soil
Project Name:	PURE GOLD D #17	Sampling Condition:	Cool & Intact
Project Number:	NOT GIVEN	Sample Received By:	Jodi Henson
Project Location:	128		

Sample ID: SP2 @ 1FT (H302214-03)

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	09/16/2013	ND	1.98	99.0	2.00	4.45		
Toluene*	<0.050	0.050	09/16/2013	ND	2.14	107	2.00	4.08		
Ethylbenzene*	<0.050	0.050	09/16/2013	ND	2.27	113	2.00	4.29		
Total Xylenes*	<0.150	0.150	09/16/2013	ND	6.92	115	6.00	2.88		
Total BTEX	<0.300	0.300	09/16/2013	ND						

Surrogate: 4-Bromofluorobenzene (PIE) 112 % 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	128	16.0	09/16/2013	ND	432	108	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	09/16/2013	ND	187	93.5	200	7.17		
DRO >C10-C28	<10.0	10.0	09/16/2013	ND	163	81.5	200	12.6		

Surrogate: 1-Chlorooctane 87.0 % 65.2-140

Surrogate: 1-Chlorooctadecane 95.2 % 63.6-154

Sample ID: SP2 @ 2FT (H302214-04)

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	09/16/2013	ND	432	108	400	3.77		

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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: 09/13/2013
 Reported: 09/17/2013
 Project Name: PURE GOLD D #17
 Project Number: NOT GIVEN
 Project Location: 128

 Sampling Date: 09/12/2013
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: SP2 @ 3FT (H302214-05)

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	09/16/2013	ND	1.98	99.0	2.00	4.45		
Toluene*	<0.050	0.050	09/16/2013	ND	2.14	107	2.00	4.08		
Ethylbenzene*	<0.050	0.050	09/16/2013	ND	2.27	113	2.00	4.29		
Total Xylenes*	<0.150	0.150	09/16/2013	ND	6.92	115	6.00	2.88		
Total BTEX	<0.300	0.300	09/16/2013	ND						

Surrogate: 4-Bromofluorobenzene (PIC) 112 % 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	80.0	16.0	09/16/2013	ND	432	108	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	09/16/2013	ND	187	93.5	200	7.17		
DRO >C10-C28	<10.0	10.0	09/16/2013	ND	163	81.5	200	12.6		

Surrogate: 1-Chlorooctane 90.5 % 65.2-140

Surrogate: 1-Chlorooctadecane 96.6 % 63.6-154

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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
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 Received: 09/13/2013
 Reported: 09/17/2013
 Project Name: PURE GOLD D #17
 Project Number: NOT GIVEN
 Project Location: 128

 Sampling Date: 09/12/2013
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: SP3 @ 1FT (H302214-06)

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	09/16/2013	ND	1.98	99.0	2.00	4.45		
Toluene*	<0.050	0.050	09/16/2013	ND	2.14	107	2.00	4.08		
Ethylbenzene*	<0.050	0.050	09/16/2013	ND	2.27	113	2.00	4.29		
Total Xylenes*	<0.150	0.150	09/16/2013	ND	6.92	115	6.00	2.88		
Total BTEX	<0.300	0.300	09/16/2013	ND						

Surrogate: 4-Bromofluorobenzene (PID) 112 % 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	592	16.0	09/16/2013	ND	432	108	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	09/16/2013	ND	187	93.5	200	7.17		
DRO >C10-C28	<10.0	10.0	09/16/2013	ND	163	81.5	200	12.6		

Surrogate: 1-Chlorooctane 87.7 % 65.2-140

Surrogate: 1-Chlorooctadecane 92.7 % 63.6-154

Sample ID: SP3 @ 2FT (H302214-07)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	224	16.0	09/16/2013	ND	432	108	400	3.77		

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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: 09/13/2013
 Reported: 09/17/2013
 Project Name: PURE GOLD D #17
 Project Number: NOT GIVEN
 Project Location: 128

 Sampling Date: 09/12/2013
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: SP3 @ 3FT (H302214-08)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	112	16.0	09/16/2013	ND	432	108	400	3.77		

Sample ID: SP3 @ 4FT (H302214-09)

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	09/16/2013	ND	1.98	99.0	2.00	4.45		
Toluene*	<0.050	0.050	09/16/2013	ND	2.14	107	2.00	4.08		
Ethylbenzene*	<0.050	0.050	09/16/2013	ND	2.27	113	2.00	4.29		
Total Xylenes*	<0.150	0.150	09/16/2013	ND	6.92	115	6.00	2.88		
Total BTEX	<0.300	0.300	09/16/2013	ND						

Surrogate: 4-Bromofluorobenzene (PID) 117 % 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	112	16.0	09/16/2013	ND	432	108	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	09/16/2013	ND	187	93.5	200	7.17		
DRO >C10-C28	85.0	10.0	09/16/2013	ND	163	81.5	200	12.6		

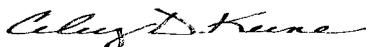
Surrogate: 1-Chlorooctane 87.7 % 65.2-140

Surrogate: 1-Chlorooctadecane 94.8 % 63.6-154

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* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

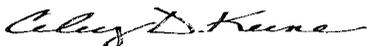
Notes and Definitions

- 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

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised October 10, 2003

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company	Oxy Permian Ltd.	Contact	CJ Summers
Address	1017 W. Stanolind Rd, Hobbs, NM	Telephone No.	(575) 397-8216
Facility Name	Pure Gold D Federal #17	Facility Type	
Surface Owner	BLM	Mineral Owner	API No. 30-015-27112

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
E	28	23S	31E	1980'	N	330'	W	Eddy Co.

Latitude _____ Longitude _____

NATURE OF RELEASE

Type of Release	Oil and Produced water	Volume of Release	3 bbls of oil and 11 bbls of produced water	Volume Recovered	0 bbls
Source of Release	3 inch poly production flow line	Date and Hour of Occurrence	08/12/2013	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?	Mike Bratcher-NMOCD, Jennifer VanCuren and James Amos- BLM		
By Whom?	Rachael McPherson	Date and Hour	08/12/2013 @ 2:08 pm		
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.*
A three inch poly production flow line was compromised spilling 3 bbls of oil and 11 bbls of production water onto the ground. No fluids were recovered and the line was repaired.

Describe Area Affected and Cleanup Action Taken.*
The areas affected are the location pad and pasture. Remediation will be completed in accordance with a remediation plan approved by NMOCD and the BLM.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature:	<u>OIL CONSERVATION DIVISION</u>		
Printed Name: Chancey Summers	Approved by District Supervisor:		
Title: HES Specialist	Approval Date:	Expiration Date:	
E-mail Address: Chancey.Summers@oxy.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 8/22/13	Phone: (575) 397-8216		

* Attach Additional Sheets If Necessary