

# SITE INFORMATION

## Report Type: Closure Report

General Site Information:				
Site:	Skelly Unit #975			
Company:	COG Operating LLC			
Section, Township, and Range:	23	17S	31E	
Lease Number:	API# 30-015-36356			
County:	Eddy County, NM			
GPS:	N 32.82613°		W 103.83923°	
Surface Owner:	Federal			
Mineral Owner:				
Directions:	From the intersection of Hwy 529 and Hwy 82, go East on Hwy 82 for 2 miles, turn North on dirt road and go 0.1 mile, turn East and go 0.2 mile, turn South to location.			

Release Data:	
Date Released:	10/21/2013
Type of Release:	Oil and produced water
Source of Contamination:	Chemical injection line on well
Fluid Released:	5 bbls of oil
Fluids Recovered:	5 bbls of produced water

Official Communication:		
Name:	Pat Ellis	Cliff Brunson
Company:	COG Operating LLC	BBC International, Inc.
Address:	550 W. Texas Ave., Ste. 1300	1324 W. Marland
PO Box:		PO Box 805
City, State, Zip Code:	Midland, TX 79701	Hobbs, NM 88241
Phone Number:	(432) 686-3023	(575) 397-6388
Fax:	(432) 684-7137	(575) 397-0397
Email:	pellis@conchoresources.com	cbrunson@bbcinternational.com

Ranking Criteria:		
<b>Depth to Groundwater:</b>	<b>Ranking Score</b>	<b>Site Data</b>
<50 ft.	20	
50-99 ft.	10	
>100 ft.	0	0
<b>Well Head Protection:</b>	<b>Ranking Score</b>	<b>Site Data</b>
Water Source <1,000 ft., Private <200	20	
Water Source >1,000 ft., Private >200	0	0
<b>Surface Body of Water:</b>	<b>Ranking Score</b>	<b>Site Data</b>
<200 ft.	20	
200 ft. - 1,000 ft.	10	
>1,000 ft.	0	0

**Total Ranking Score:** 0

**NM OIL CONSERVATION**  
 ARTESIA DISTRICT  
 JUN 06 2014

Acceptable Soil RRAL (mg/kg)		
Benzene	Total BTEX	TPH
10	50	5000

RECEIVED



# **COG Operating LLC**

## **Skelly Unit #975**

(Release Date 10/21/2013)

**Unit B, Section 23, Township 17 South, Range 31 East  
Eddy County, New Mexico**

**GPS: N 32.82613° W 103.83923°**

### **ENVIRONMENTAL SITE INVESTIGATION**

### **CLOSURE REPORT**

PERFORMED BY:

**BBC INTERNATIONAL, INC.**  
WORLD-WIDE ENVIRONMENTAL SPECIALISTS  
1324 W. MARLAND BLVD.  
P. O. BOX 805  
HOBBS, NEW MEXICO 88240  
(575) 397-6388 • FAX (575) 397-0397

**June 4, 2014**

PREPARED FOR:

**MR. PAT ELLIS  
MANAGER, HSE  
COG OPERATING LLC  
FASKEN CENTER TOWER II  
550 WEST TEXAS AVENUE, SUITE 100  
MIDLAND, TEXAS 79701**

Mr. Mike Bratcher  
Compliance Officer  
Oil Conservation Division, District 2  
811 South First  
Artesia, NM 88210

Re: Closure Report for COG Operating LLC, Skelly Unit #975, Unit B,  
Section 23, Township 17 South, Range 31 East, Eddy County, NM

## **1.0 SITE CHARACTERIZATION**

The subject site is located East of Maljamar, NM, in Section 23, Township 17 South, and Range 31 East, Eddy County, New Mexico. The GPS coordinates are N 32.82613° W 103.83923°. The site consists of undeveloped rangeland and petroleum production facilities. On October 21, 2013, a leak occurred in a chemical injection line on the well. The spill measured roughly 85 feet in length and 45 feet in width. Approximately 5 bbls of oil were released and 5 bbls of produced water were recovered.

A diagram of the location including the sample points can be reviewed in Appendix I of this report. The surface soil is tan or reddish sand with caliche and rock. There is no water source within 1,000 feet of this site. Based on the data from the Eddy County Groundwater Trend Map, the depth to groundwater in Section 23, Township 17 South, and Range 31 East is approximately 300 feet. The initial C-141 for the leak is at the end of this report in Appendix III.

## **2.0 SITE INVESTIGATION ACTIVITIES**

On November 13, 2013, and November 14, 2013, BBC personnel conducted a delineation of the site using a hand auger. The site delineation occurred after initial spill response activities had been conducted by COG. Sample points were taken at the surface, at 1 foot, and at 2 feet in the area of SP1. At SP2, samples were taken at the surface and at depths of 2 feet, 4 feet, and 6 feet. Sample points were taken at 1 foot, 2 feet, and 3 feet at SP3. And, at SP4 samples were taken at the surface and at depths of 1 foot and 2 feet. The samples were delivered to Cardinal Laboratories for BTEX, chloride content, and TPH analysis. The total BTEX results were as follows: 3.53 mg/Kg at SP1 at the surface, and below reporting limits for SP1 at 1 foot and 2 foot. For SP2 and SP3, total BTEX was below reporting limits at all depths including surface. For SP4, total BTEX was 2.29 mg/Kg at the surface and below reporting limits at 1 foot and 2 feet. Chloride content results were 2,240 mg/Kg at SP1 at the surface, 320 mg/Kg at 1 foot, and 112 mg/Kg at 2 feet. At SP2, chloride results were 3,080 mg/Kg at the surface, 7,280 mg/Kg at 2 feet, 14,800 mg/Kg at 4 feet, and 1,880 mg/Kg at 6 feet. The chloride results at SP3 were 464 mg/Kg at 1 foot, 352 mg/Kg at 2 feet, and 160 mg/Kg at 3 feet. At SP4, the chloride results were 4,480 mg/Kg at the

surface, 48 mg/Kg at 1 foot, and 1,140 mg/Kg at 2 feet. The TPH results were as follows: All samples at SP1 were below reporting limits except the DRO at SP1 at the surface which was 135 mg/Kg. The GRO for SP2 were all below reporting limits but the DRO were 20.8 mg/Kg at the surface, 34.6 mg/Kg at 2 feet, 13.8 mg/Kg at 4 feet, and 67.4 mg/Kg at 6 feet. All TPH results for SP3 and SP4 were below reporting limits except the DRO for SP4 at the surface which was 112 mg/Kg.

Upon review of the initial chloride results, it was determined that additional sampling would need to be completed at SP2 and SP4. Therefore, on December 19, 2013, using a backhoe, additional samples were conducted 7 feet, 8 feet, and 9 feet at SP2 and at 4 feet at SP4. The samples were taken to Cardinal Laboratories for chloride content sampling. The results of the analysis for SP2 were 784 mg/Kg at 7 feet, 64 mg/Kg at 8 feet, and 32 mg/Kg at 9 feet. The results at SP4 were 32 mg/Kg at 4 feet. The results of the analysis are located in Appendix II of this report. The sample point locations can be viewed on the site diagram in Appendix I of this report.

### **3.0 CONCLUSION AND RECOMMENDATION**

On February 19, 2014, Cliff Brunson with BBC International met with Mike Bratcher of NMOCD to discuss the proposed remediation plan for this site. Mike Bratcher approved the plan during the meeting and the correspondence correlating this conversation can be located in Appendix IV of this report.

On February 25, 2014, the proposed remediation plan for this site was sent via email to Mike Burton of the BLM requesting his approval. Mr. Burton approved the plan with two stipulations: the area around SP2 should be excavated to at least 4 feet to remove most of the chloride contamination, and that confirmation sidewall samples be obtained to verify removal of any horizontal contamination. Email correspondence is located in Appendix IV of this report.

In accordance with the approved remediation plan, excavation was completed by removing the impacted soil to a depth of 6 inches across the entire leak site, except in the area of SP2. In this area, impacted soil was removed to a depth of 4 feet. Confirmation sidewall samples were obtained at the request of the BLM and the results of those samples were all below reporting limits. Results of the analysis of these samples are located in Appendix II of this report. Once, confirmation sample results were verified to be below reporting limits, the site was backfilled with clean soil.

Thus, BBC International requests closure of this site since all remediation activities have been completed as described in the approved plan. Also, a final C-141 is located in Appendix III of this report.

# APPENDIX I

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**Site Diagram**  
*November 2013*

## **Skelly Unit #975 (10/21/2013)**

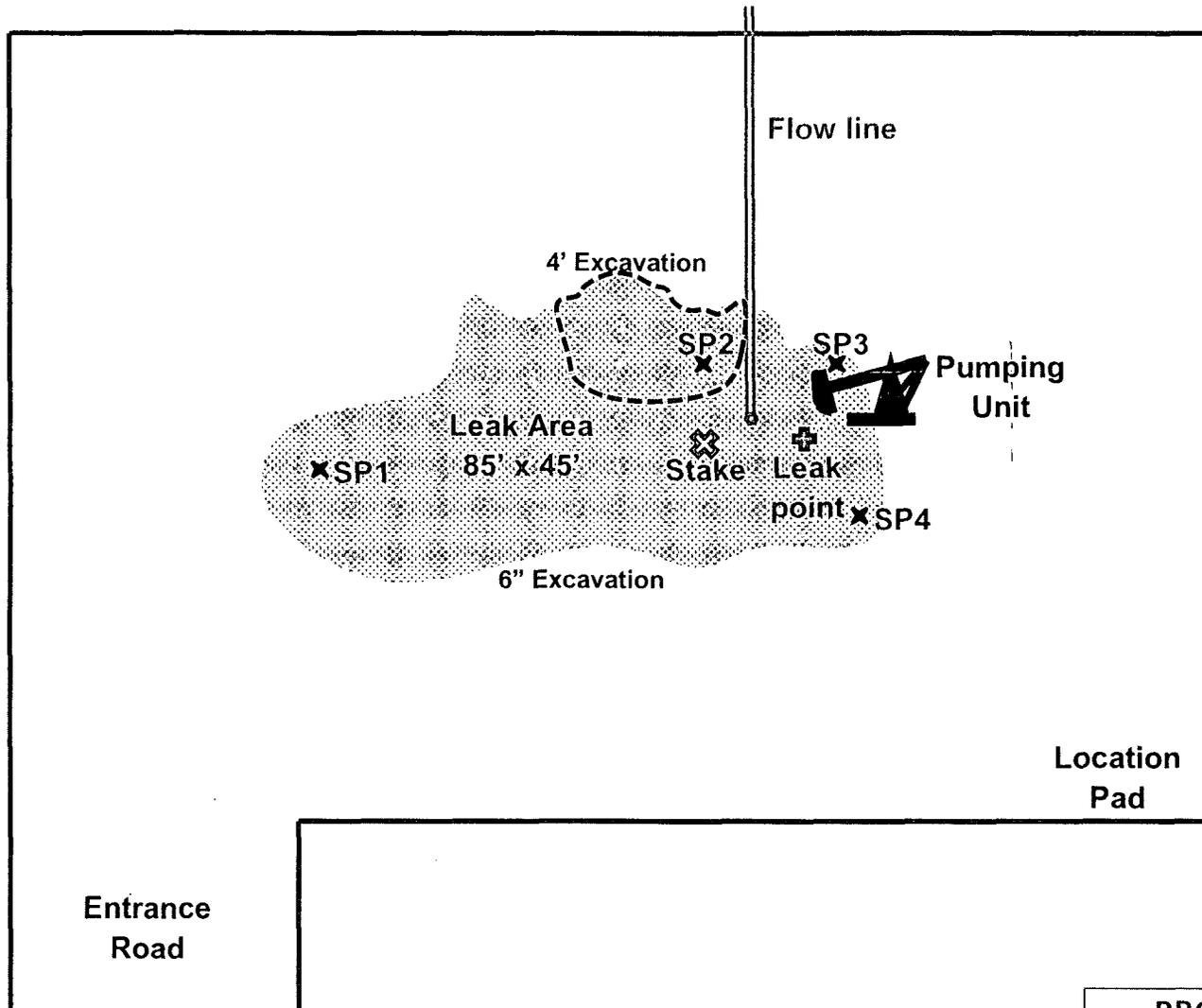
Unit B, Section 23, Township 17 South, Range 31 East  
Eddy County, NM  
GPS: N 32.82613° W 103.83923°

**Prepared for:**  
COG Operating LLC  
Midland, Texas

**Prepared by:**  
BBC International, Inc.



COG  
Skelly Unit #975



U/L B, Section 23, T17S, R31E  
500'FNL and 2310'FEL  
Eddy County, NM  
N 32.82613° W 103.83923° at stake  
API# 30-01536356

BBC International, Inc.	
COG	
Skelly Unit #975	
Date: 11/7/13	DRWG by: K. Purvis
NOT TO SCALE	File: COG 2013



# Groundwater Plot

## COG Skelly Unit #975

County  
Eddy

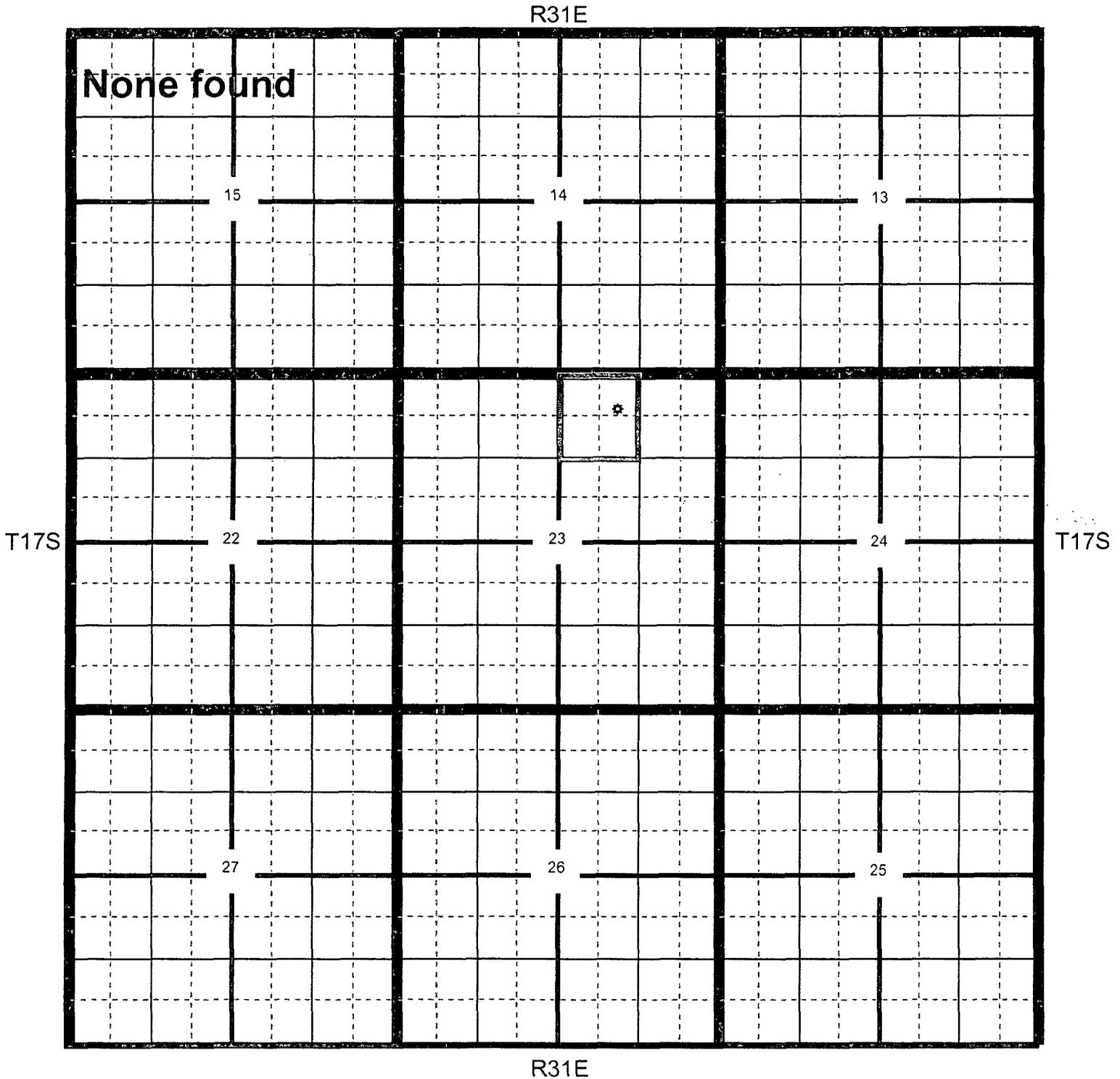
Unit Letter  
B

Section  
23

Township  
17S

Range  
31E

Trend Map 300'



⊛ Location

○ OCD

○ USGS

○ SEO

● All Databases

COG Skelly Unit #975

County Eddy      Unit Letter B      Section 23      Township 17S      Range 31E

Trend Map 300'

1

2

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

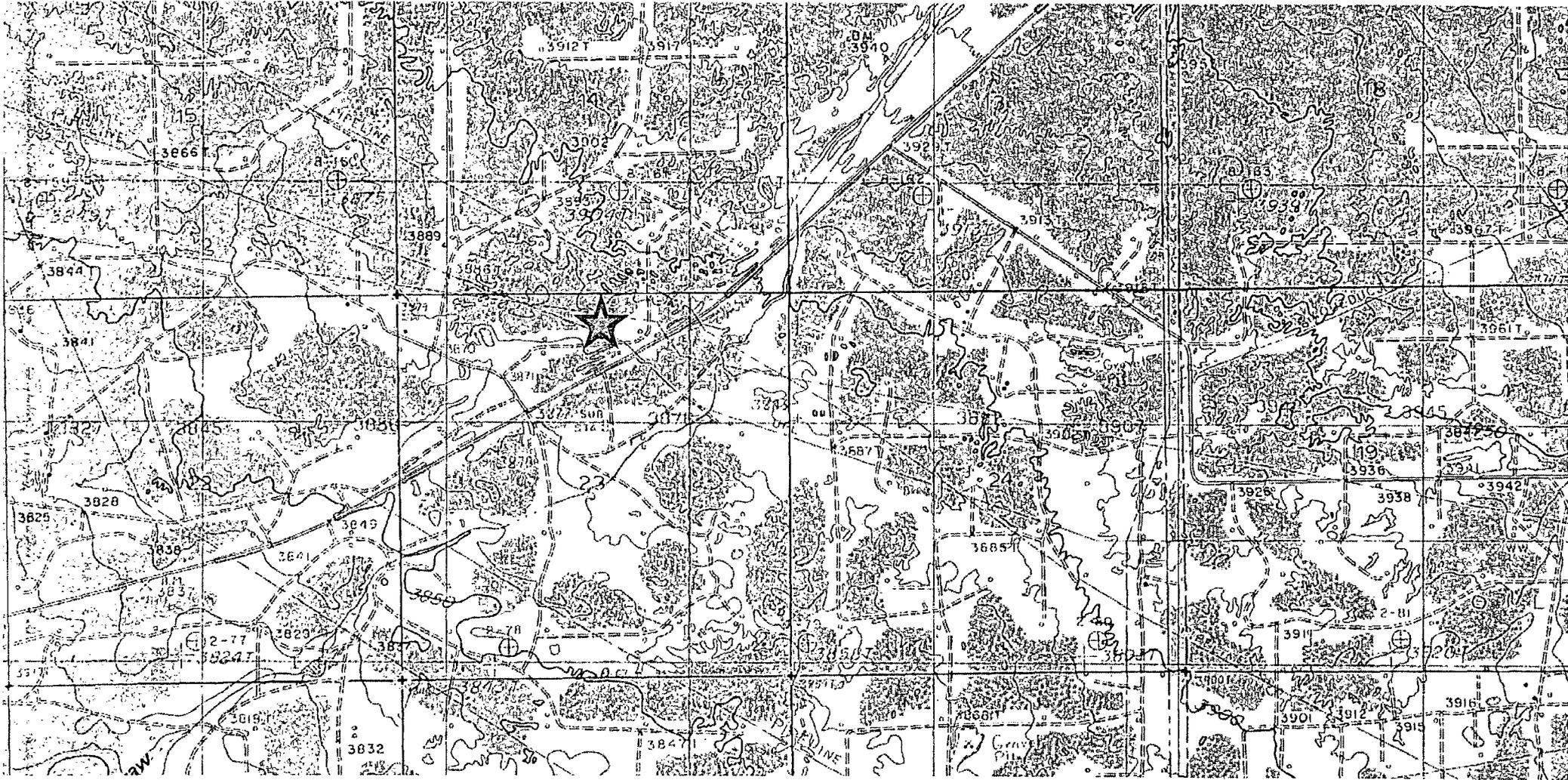
3

4



COG

Skelly Unit #975





Google

# APPENDIX II

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## Laboratory Analytical Results

*November 2013, December 2013, and April 2014*

### Skelly Unit #975 (10/21/2013)

Unit B, Section 23, Township 17 South, Range 31 East  
Eddy County, NM  
GPS: N 32.82613° W 103.83923°

Prepared for:  
COG Operating LLC  
Midland, Texas

Prepared by:  
BBC International, Inc.

**Laboratory Analytical Results Summary**  
**COG, Skelly Unit #975**

Analyte	Method	Sample Date	SP1 @ SURFACE	SP1 @ 1'	SP1 @ 2'
			11/13/13	11/13/13	11/13/13
			mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		0.108	<0.050	<0.050
Toluene	BTEX 8021B		1.33	<0.050	<0.050
Ethylbenzene	BTEX 8021B		0.887	<0.050	<0.050
Total Xylenes	BTEX 8021B		1.2	<0.150	<0.150
Total BTEX	BTEX 8021B		3.53	<0.300	<0.300
Chloride	SM4500Cl-B		2240	320	112
GRO	TPH 8015M		<10.0	<10.0	<10.0
DRO	TPH 8015M		135	<10.0	<10.0

Analyte	Method	Sample Date	SP2 @ SURFACE	SP2 @ 2'	SP2 @ 4'	SP2 @ 6'	SP2 @ 7'	SP2 @ 8'	SP2 @ 9'
			11/13/13	11/13/13	11/14/13	11/14/13	12/19/13	12/19/13	12/19/13
			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.050	<0.050	<0.050	<0.050	n/a	n/a	n/a
Toluene	BTEX 8021B		<0.050	<0.050	<0.050	<0.050	n/a	n/a	n/a
Ethylbenzene	BTEX 8021B		0.077	<0.050	<0.050	<0.050	n/a	n/a	n/a
Total Xylenes	BTEX 8021B		<0.150	<0.150	<0.150	<0.150	n/a	n/a	n/a
Total BTEX	BTEX 8021B		<0.300	<0.300	<0.300	<0.300	n/a	n/a	n/a
Chloride	SM4500Cl-B		3080	7280	14800	1880	784	64	32
GRO	TPH 8015M		<10.0	<10.0	<10.0	<10.0	n/a	n/a	n/a
DRO	TPH 8015M		20.8	34.6	13.8	67.4	n/a	n/a	n/a

Analyte	Method	Sample Date	SP3 @ 1'	SP3 @ 2'	SP3 @ 3'
			11/14/13	11/14/13	11/14/13
			mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.050	<0.050	<0.050
Toluene	BTEX 8021B		<0.050	<0.050	<0.050
Ethylbenzene	BTEX 8021B		<0.050	<0.050	<0.050
Total Xylenes	BTEX 8021B		<0.150	<0.150	<0.150
Total BTEX	BTEX 8021B		<0.300	<0.300	<0.300
Chloride	SM4500Cl-B		464	352	160
GRO	TPH 8015M		<10.0	<10.0	<10.0
DRO	TPH 8015M		<10.0	<10.0	<10.0

Analyte	Method	Sample Date	SP4 @ SURFACE	SP4 @ 1'	SP4 @ 2'	SP4 @ 4'
			11/14/13	11/14/13	11/14/13	12/19/13
			mg/Kg	mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.050	<0.050	<0.050	n/a
Toluene	BTEX 8021B		0.495	<0.050	<0.050	n/a
Ethylbenzene	BTEX 8021B		0.695	<0.050	<0.050	n/a
Total Xylenes	BTEX 8021B		1.1	<0.150	<0.150	n/a
Total BTEX	BTEX 8021B		2.29	<0.300	<0.300	n/a
Chloride	SM4500Cl-B		4480	48	1140	32
GRO	TPH 8015M		<10.0	<10.0	<10.0	n/a
DRO	TPH 8015M		112	<10.0	<10.0	n/a

**Laboratory Analytical Results Summary**  
**COG, Skelly Unit #975**

		Sample	North Sidewall	South Sidewall	East Sidewall	West Sidewall
Analyte	Method	Date	4/21/14	4/21/14	4/21/14	4/21/14
			mg/Kg	mg/Kg	mg/Kg	mg/Kg
Chloride	SM4500Cl-B		<16.0	<16.0	<16.0	<16.0

November 27, 2013

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

RE: SKELLY #975

Enclosed are the results of analyses for samples received by the laboratory on 11/21/13 11:05.

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,



Mike Snyder  
Organic Supervisor

**Analytical Results For:**

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

 Received: 11/21/2013  
 Reported: 11/27/2013  
 Project Name: SKELLY #975  
 Project Number: NONE GIVEN  
 Project Location: LOCO HILLS, NM

 Sampling Date: 11/13/2013  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 1 @ SURFACE (H302849-01)**

BTEX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Benzene*</b>	<b>0.108</b>	0.050	11/25/2013	ND	1.95	97.4	2.00	0.491		
<b>Toluene*</b>	<b>1.33</b>	0.050	11/25/2013	ND	1.96	97.8	2.00	0.750		
<b>Ethylbenzene*</b>	<b>0.887</b>	0.050	11/25/2013	ND	1.94	97.1	2.00	2.11		
<b>Total Xylenes*</b>	<b>1.20</b>	0.150	11/25/2013	ND	5.74	95.7	6.00	2.65		
<b>Total BTEX</b>	<b>3.53</b>	0.300	11/25/2013	ND						

Surrogate: 4-Bromofluorobenzene (PIC) 111 % 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	
<b>Chloride</b>	<b>2240</b>	16.0	11/26/2013	ND	400	100	400	3.92		

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	11/24/2013	ND	171	85.5	200	5.54		
<b>DRO &gt;C10-C28</b>	<b>135</b>	10.0	11/24/2013	ND	161	80.5	200	6.94		

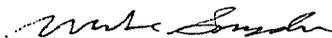
Surrogate: 1-Chlorooctane 93.6 % 65.2-140

Surrogate: 1-Chlorooctadecane 89.2 % 63.6-154

Cardinal Laboratories

\* = Accredited Analyte

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Mike Snyder, Organic Supervisor

**Analytical Results For:**

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

 Received: 11/21/2013  
 Reported: 11/27/2013  
 Project Name: SKELLY #975  
 Project Number: NONE GIVEN  
 Project Location: LOCO HILLS, NM

 Sampling Date: 11/13/2013  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 1 @ 1 FT (H302849-02)**

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	11/25/2013	ND	1.95	97.4	2.00	0.491		
Toluene*	<0.050	0.050	11/25/2013	ND	1.96	97.8	2.00	0.750		
Ethylbenzene*	<0.050	0.050	11/25/2013	ND	1.94	97.1	2.00	2.11		
Total Xylenes*	<0.150	0.150	11/25/2013	ND	5.74	95.7	6.00	2.65		
Total BTEX	<0.300	0.300	11/25/2013	ND						

Surrogate: 4-Bromofluorobenzene (PID) 110 % 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	320	16.0	11/26/2013	ND	400	100	400	3.92		

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	11/24/2013	ND	171	85.5	200	5.54		
DRO >C10-C28	<10.0	10.0	11/24/2013	ND	161	80.5	200	6.94		

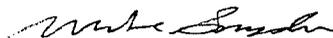
Surrogate: 1-Chlorooctane 82.4 % 65.2-140

Surrogate: 1-Chlorooctadecane 74.2 % 63.6-154

Cardinal Laboratories

\* = Accredited Analyte

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Mike Snyder, Organic Supervisor

**Analytical Results For:**

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

 Received: 11/21/2013  
 Reported: 11/27/2013  
 Project Name: SKELLY #975  
 Project Number: NONE GIVEN  
 Project Location: LOCO HILLS, NM

 Sampling Date: 11/13/2013  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 1 @ 2 FT (H302849-03)**

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	11/25/2013	ND	1.95	97.4	2.00	0.491		
Toluene*	<0.050	0.050	11/25/2013	ND	1.96	97.8	2.00	0.750		
Ethylbenzene*	<0.050	0.050	11/25/2013	ND	1.94	97.1	2.00	2.11		
Total Xylenes*	<0.150	0.150	11/25/2013	ND	5.74	95.7	6.00	2.65		
Total BTEX	<0.300	0.300	11/25/2013	ND						

Surrogate: 4-Bromofluorobenzene (PIC) 110 % 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	112	16.0	11/26/2013	ND	400	100	400	3.92		

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	11/24/2013	ND	171	85.5	200	5.54		
DRO >C10-C28	<10.0	10.0	11/24/2013	ND	161	80.5	200	6.94		

Surrogate: 1-Chlorooctane 95.0 % 65.2-140

Surrogate: 1-Chlorooctadecane 90.2 % 63.6-154

Cardinal Laboratories

\*=Accredited Analyte

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Mike Snyder, Organic Supervisor

**Analytical Results For:**

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

 Received: 11/21/2013  
 Reported: 11/27/2013  
 Project Name: SKELLY #975  
 Project Number: NONE GIVEN  
 Project Location: LOCO HILLS, NM

 Sampling Date: 11/13/2013  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 2 @ SURFACE (H302849-04)**

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	11/25/2013	ND	1.95	97.4	2.00	0.491		
Toluene*	<0.050	0.050	11/25/2013	ND	1.96	97.8	2.00	0.750		
<b>Ethylbenzene*</b>	<b>0.077</b>	0.050	11/25/2013	ND	1.94	97.1	2.00	2.11		
Total Xylenes*	<0.150	0.150	11/25/2013	ND	5.74	95.7	6.00	2.65		
Total BTEX	<0.300	0.300	11/25/2013	ND						

Surrogate: 4-Bromofluorobenzene (PIC) 111 % 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	
<b>Chloride</b>	<b>3080</b>	16.0	11/26/2013	ND	400	100	400	3.92		

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	11/24/2013	ND	171	85.5	200	5.54		
<b>DRO &gt;C10-C28</b>	<b>20.8</b>	10.0	11/24/2013	ND	161	80.5	200	6.94		

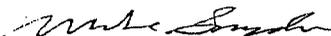
Surrogate: 1-Chlorooctane 76.9 % 65.2-140

Surrogate: 1-Chlorooctadecane 71.7 % 63.6-154

Cardinal Laboratories

\*=Accredited Analyte

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Mike Snyder, Organic Supervisor

**Analytical Results For:**

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

 Received: 11/21/2013  
 Reported: 11/27/2013  
 Project Name: SKELLY #975  
 Project Number: NONE GIVEN  
 Project Location: LOCO HILLS, NM

 Sampling Date: 11/13/2013  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 2 @ 2 FT (H302849-05)**

BTEX 80218		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	11/25/2013	ND	1.95	97.4	2.00	0.491		
Toluene*	<0.050	0.050	11/25/2013	ND	1.96	97.8	2.00	0.750		
Ethylbenzene*	<0.050	0.050	11/25/2013	ND	1.94	97.1	2.00	2.11		
Total Xylenes*	<0.150	0.150	11/25/2013	ND	5.74	95.7	6.00	2.65		
Total BTEX	<0.300	0.300	11/25/2013	ND						

Surrogate: 4-Bromofluorobenzene (PIC) 110 % 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	7280	16.0	11/26/2013	ND	400	100	400	3.92		

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	11/24/2013	ND	171	85.5	200	5.54		
DRO >C10-C28	34.6	10.0	11/24/2013	ND	161	80.5	200	6.94		

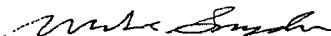
Surrogate: 1-Chlorooctane 82.4 % 65.2-140

Surrogate: 1-Chlorooctadecane 78.4 % 63.6-154

Cardinal Laboratories

\*=Accredited Analyte

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Mike Snyder, Organic Supervisor

**Analytical Results For:**

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

 Received: 11/21/2013  
 Reported: 11/27/2013  
 Project Name: SKELLY #975  
 Project Number: NONE GIVEN  
 Project Location: LOCO HILLS, NM

 Sampling Date: 11/14/2013  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 2 @ 4 FT (H302849-06)**

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	11/25/2013	ND	1.95	97.4	2.00	0.491		
Toluene*	<0.050	0.050	11/25/2013	ND	1.96	97.8	2.00	0.750		
Ethylbenzene*	<0.050	0.050	11/25/2013	ND	1.94	97.1	2.00	2.11		
Total Xylenes*	<0.150	0.150	11/25/2013	ND	5.74	95.7	6.00	2.65		
Total BTEX	<0.300	0.300	11/25/2013	ND						

Surrogate: 4-Bromofluorobenzene (PID) 110 % 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	14800	16.0	11/26/2013	ND	400	100	400	3.92		

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	11/24/2013	ND	171	85.5	200	5.54		
DRO >C10-C28	13.8	10.0	11/24/2013	ND	161	80.5	200	6.94		

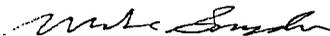
Surrogate: 1-Chlorooctane 75.4 % 65.2-140

Surrogate: 1-Chlorooctadecane 73.9 % 63.6-154

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\*=Accredited Analyte

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Mike Snyder, Organic Supervisor

**Analytical Results For:**

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

 Received: 11/21/2013  
 Reported: 11/27/2013  
 Project Name: SKELLY #975  
 Project Number: NONE GIVEN  
 Project Location: LOCO HILLS, NM

 Sampling Date: 11/14/2013  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 2 @ 6 FT (H302849-07)**

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	11/25/2013	ND	1.95	97.4	2.00	0.491		
Toluene*	<0.050	0.050	11/25/2013	ND	1.96	97.8	2.00	0.750		
Ethylbenzene*	<0.050	0.050	11/25/2013	ND	1.94	97.1	2.00	2.11		
Total Xylenes*	<0.150	0.150	11/25/2013	ND	5.74	95.7	6.00	2.65		
Total BTEX	<0.300	0.300	11/25/2013	ND						

Surrogate: 4-Bromofluorobenzene (PID) 112 % 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	1880	16.0	11/26/2013	ND	400	100	400	3.92		

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	11/24/2013	ND	171	85.5	200	5.54		
DRO >C10-C28	67.4	10.0	11/24/2013	ND	161	80.5	200	6.94		

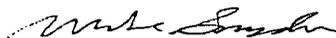
Surrogate: 1-Chlorooctane 85.9 % 65.2-140

Surrogate: 1-Chlorooctadecane 86.1 % 63.6-154

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Mike Snyder, Organic Supervisor

**Analytical Results For:**

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

 Received: 11/21/2013  
 Reported: 11/27/2013  
 Project Name: SKELLY #975  
 Project Number: NONE GIVEN  
 Project Location: LOCO HILLS, NM

 Sampling Date: 11/14/2013  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 3 @ 1 FT (H302849-08)**

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	11/25/2013	ND	1.95	97.4	2.00	0.491		
Toluene*	<0.050	0.050	11/25/2013	ND	1.96	97.8	2.00	0.750		
Ethylbenzene*	<0.050	0.050	11/25/2013	ND	1.94	97.1	2.00	2.11		
Total Xylenes*	<0.150	0.150	11/25/2013	ND	5.74	95.7	6.00	2.65		
Total BTEX	<0.300	0.300	11/25/2013	ND						

Surrogate: 4-Bromofluorobenzene (PID) 110 % 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	464	16.0	11/26/2013	ND	400	100	400	3.92		

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	11/24/2013	ND	171	85.5	200	5.54		
DRO >C10-C28	<10.0	10.0	11/24/2013	ND	161	80.5	200	6.94		

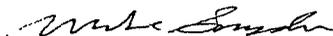
Surrogate: 1-Chlorooctane 82.4 % 65.2-140

Surrogate: 1-Chlorooctadecane 78.8 % 63.6-154

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Mike Snyder, Organic Supervisor

**Analytical Results For:**

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

 Received: 11/21/2013  
 Reported: 11/27/2013  
 Project Name: SKELLY #975  
 Project Number: NONE GIVEN  
 Project Location: LOCO HILLS, NM

 Sampling Date: 11/14/2013  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 3 @ 2 FT (H302849-09)**

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	11/25/2013	ND	1.95	97.4	2.00	0.491		
Toluene*	<0.050	0.050	11/25/2013	ND	1.96	97.8	2.00	0.750		
Ethylbenzene*	<0.050	0.050	11/25/2013	ND	1.94	97.1	2.00	2.11		
Total Xylenes*	<0.150	0.150	11/25/2013	ND	5.74	95.7	6.00	2.65		
Total BTEX	<0.300	0.300	11/25/2013	ND						

Surrogate: 4-Bromofluorobenzene (PID) 111 % 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	352	16.0	11/26/2013	ND	400	100	400	3.92		

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	11/24/2013	ND	171	85.5	200	5.54		
DRO >C10-C28	<10.0	10.0	11/24/2013	ND	161	80.5	200	6.94		

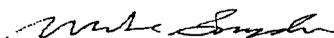
Surrogate: 1-Chlorooctane 98.1 % 65.2-140

Surrogate: 1-Chlorooctadecane 98.5 % 63.6-154

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Mike Snyder, Organic Supervisor

**Analytical Results For:**

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

 Received: 11/21/2013  
 Reported: 11/27/2013  
 Project Name: SKELLY #975  
 Project Number: NONE GIVEN  
 Project Location: LOCO HILLS, NM

 Sampling Date: 11/14/2013  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 3 @ 3 FT (H302849-10)**

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	11/25/2013	ND	1.95	97.4	2.00	0.491		
Toluene*	<0.050	0.050	11/25/2013	ND	1.96	97.8	2.00	0.750		
Ethylbenzene*	<0.050	0.050	11/25/2013	ND	1.94	97.1	2.00	2.11		
Total Xylenes*	<0.150	0.150	11/25/2013	ND	5.74	95.7	6.00	2.65		
Total BTEX	<0.300	0.300	11/25/2013	ND						

Surrogate: 4-Bromofluorobenzene (PIC) 110 % 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	160	16.0	11/26/2013	ND	400	100	400	3.92		

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	11/24/2013	ND	171	85.5	200	5.54		
DRO >C10-C28	<10.0	10.0	11/24/2013	ND	161	80.5	200	6.94		

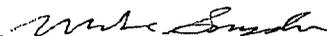
Surrogate: 1-Chlorooctane 82.7 % 65.2-140

Surrogate: 1-Chlorooctadecane 79.1 % 63.6-154

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\*=Accredited Analyte

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Mike Snyder, Organic Supervisor

**Analytical Results For:**

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

 Received: 11/21/2013  
 Reported: 11/27/2013  
 Project Name: SKELLY #975  
 Project Number: NONE GIVEN  
 Project Location: LOCO HILLS, NM

 Sampling Date: 11/14/2013  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 4 @ SURFACE (H302849-11)**

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	11/25/2013	ND	1.95	97.4	2.00	0.491		
Toluene*	<b>0.495</b>	0.050	11/25/2013	ND	1.96	97.8	2.00	0.750		
Ethylbenzene*	<b>0.695</b>	0.050	11/25/2013	ND	1.94	97.1	2.00	2.11		
Total Xylenes*	<b>1.10</b>	0.150	11/25/2013	ND	5.74	95.7	6.00	2.65		
<b>Total BTEX</b>	<b>2.29</b>	0.300	11/25/2013	ND						

Surrogate: 4-Bromofluorobenzene (PIE) 113 % 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	
<b>Chloride</b>	<b>4480</b>	16.0	11/26/2013	ND	416	104	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	11/24/2013	ND	171	85.5	200	5.54		
<b>DRO &gt;C10-C28</b>	<b>112</b>	10.0	11/24/2013	ND	161	80.5	200	6.94		

Surrogate: 1-Chlorooctane 97.0 % 65.2-140

Surrogate: 1-Chlorooctadecane 110 % 63.6-154

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Mike Snyder, Organic Supervisor

**Analytical Results For:**

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

 Received: 11/21/2013  
 Reported: 11/27/2013  
 Project Name: SKELLY #975  
 Project Number: NONE GIVEN  
 Project Location: LOCO HILLS, NM

 Sampling Date: 11/14/2013  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 4 @ 1 FT (H302849-12)**

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	11/25/2013	ND	1.95	97.4	2.00	0.491		
Toluene*	<0.050	0.050	11/25/2013	ND	1.96	97.8	2.00	0.750		
Ethylbenzene*	<0.050	0.050	11/25/2013	ND	1.94	97.1	2.00	2.11		
Total Xylenes*	<0.150	0.150	11/25/2013	ND	5.74	95.7	6.00	2.65		
Total BTEX	<0.300	0.300	11/25/2013	ND						

Surrogate: 4-Bromofluorobenzene (PID) 111 % 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	11/26/2013	ND	416	104	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	11/24/2013	ND	171	85.5	200	5.54		
DRO >C10-C28	<10.0	10.0	11/24/2013	ND	161	80.5	200	6.94		

Surrogate: 1-Chlorooctane 95.5 % 65.2-140

Surrogate: 1-Chlorooctadecane 94.2 % 63.6-154

Cardinal Laboratories

\*=Accredited Analyte

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Mike Snyder, Organic Supervisor

**Analytical Results For:**

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

 Received: 11/21/2013  
 Reported: 11/27/2013  
 Project Name: SKELLY #975  
 Project Number: NONE GIVEN  
 Project Location: LOCO HILLS, NM

 Sampling Date: 11/14/2013  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 4 @ 2 FT (H302849-13)**

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	11/25/2013	ND	2.14	107	2.00	0.779		
Toluene*	<0.050	0.050	11/25/2013	ND	2.10	105	2.00	0.448		
Ethylbenzene*	<0.050	0.050	11/25/2013	ND	2.05	103	2.00	0.544		
Total Xylenes*	<0.150	0.150	11/25/2013	ND	6.00	99.9	6.00	0.513		
Total BTEX	<0.300	0.300	11/25/2013	ND						

Surrogate: 4-Bromofluorobenzene (PIC) 110 % 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	1140	16.0	11/26/2013	ND	416	104	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	11/24/2013	ND	171	85.5	200	5.54		
DRO >C10-C28	<10.0	10.0	11/24/2013	ND	161	80.5	200	6.94		

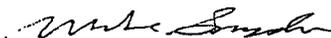
Surrogate: 1-Chlorooctane 108 % 65.2-140

Surrogate: 1-Chlorooctadecane 108 % 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.



Mike Snyder, Organic Supervisor

**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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\*=Accredited Analyte

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Mike Snyder, Organic Supervisor



# CARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240

(505) 393-2326 FAX (505) 393-2476

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

1 of 1

Page 16 of 17

Company Name: BBC International, Inc.		<b>BILL TO</b>		<b>ANALYSIS REQUEST</b>											
Project Manager: Cliff Brunson		P.O. #:													
Address: P.O. Box 805		Company:													
City: Hobbs State: NM Zip: 88241		Attn:													
Phone #: 575-397-6388 Fax #: 575-397-0397		Address: Same													
Project #:		City:													
Project Name: Skelly #975		State: Zip:													
Project Location: Loco Hills		Phone #:													
Sampler Name: Gary Ray		Fax #:													

FOR LAB USE ONLY		GRAB OR (COMP. # CONTAINERS)	MATRIX					PRESERV.		SAMPLING		DATE	TIME	TPH	B-TEX	CL-
Lab I.D.	Sample I.D.		GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE/COOL	OTHER:					
H30284		6	2			X			X		11-13-13	1:00	X	X	X	
	1. SP10 Surface ✓	6	2			X			X		11-13-13	1:20	X	X	X	
	2. SP10 2ft ✓	6	2			X			X		11-13-13	1:40	X	X	X	
	3. SP10 2ft ✓	6	2			X			X		11-13-13	2:00	X	X	X	
	4. SP20 Surface ✓	6	2			X			X		11-13-13	2:40	X	X	X	
	5. SP20 2ft ✓	6	2			X			X		11-14-13	9:00	X	X	X	
	6. SP20 4ft ✓	6	2			X			X		11-14-13	9:40	X	X	X	
	7. SP20 6ft ✓	6	2			X			X		11-14-13	10:00	X	X	X	
	8. SP30 1ft ✓	6	2			X			X		11-14-13	10:38	X	X	X	
	9. SP30 2ft ✓	6	2			X			X		11-14-13	11:00	X	X	X	
	10. SP30 3ft ✓	6	2			X			X				X	X	X	

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 the client for the 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 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 services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By:	Date: 11/21/13 Time: 8:00am	Received By:	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #:
Relinquished By:	Date: 11/21/13 Time: 11:05am	Received By: Jodi Henson	Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Fax #:
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	5.60c	Sample Condition Cool Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	CHECKED BY:
REMARKS:			

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

#54



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

**CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

2 of 2  
 Page 17 of 17

Company Name: BBC International, Inc.		<b>BILL TO</b>		<b>ANALYSIS REQUEST</b>																							
Project Manager: Cliff Brunson		P.O. #:																									
Address: P.O. Box 805		Company:																									
City: Hobbs State: NM Zip: 88241		Attn:																									
Phone #: 575-397-6388 Fax #: 575-397-0397		Address: <i>SAME</i>																									
Project #: Project Owner: <i>COB</i>		City:																									
Project Name: <i>Skelly #975</i>		State: Zip:																									
Project Location: <i>Loco Hills</i>		Phone #:																									
Sampler Name: <i>Gary RAY</i>		Fax #:																									
FOR LAB USE ONLY																											
Lab I.D.	Sample I.D.	(C)IRAB OR (C)IMP.	# CONTAINERS											MATRIX				PRESERV		SAMPLING							
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE / COOL	OTHER:	DATE	TIME													
<i>H3D2849</i>															<i>TPH</i>	<i>PPX</i>	<i>CL-</i>										
<i>11</i>	<i>SP4 @ Surface ✓</i>	<i>C</i>	<i>1</i>			<i>X</i>					<i>X</i>		<i>11-11-13</i>	<i>11:20</i>	<i>X</i>	<i>X</i>	<i>X</i>										
<i>12</i>	<i>SP4 @ 2ft ✓</i>	<i>G</i>	<i>1</i>			<i>X</i>					<i>X</i>		<i>11-14-13</i>	<i>11:45</i>	<i>X</i>	<i>X</i>	<i>X</i>										
<i>13</i>	<i>SP4 @ 2ft ✓</i>	<i>G</i>	<i>1</i>			<i>X</i>					<i>X</i>		<i>11-14-13</i>	<i>12:15</i>	<i>X</i>	<i>X</i>	<i>X</i>										
<i>KLD 11/21/13</i>																											

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 the client for the 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 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 services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By:	Date: <i>11/21/13</i>	Received By:	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
	Time: <i>8:00am</i>		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Relinquished By:	Date:	Received By: <i>Jodi Benson</i>	REMARKS:	
	Time:			
Delivered By: (Circle One)	Sample Condition	CHECKED BY:		
Sampler - UPS - Bus - Other:	Cool <input type="checkbox"/> Intact <input type="checkbox"/>			
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			

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

#54

January 03, 2014

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

RE: SKELLY #975

Enclosed are the results of analyses for samples received by the laboratory on 12/23/13 16:59.

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,



Celey D. Keene  
Lab Director/Quality Manager

**Analytical Results For:**

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

 Received: 12/23/2013  
 Reported: 01/03/2014  
 Project Name: SKELLY #975  
 Project Number: NONE GIVEN  
 Project Location: LOCO HILLS, NM

 Sampling Date: 12/19/2013  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 2 @ 7 FT (H303121-01)**

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	12/31/2013	ND	400	100	400	11.3		

**Sample ID: SP 2 @ 8 FT (H303121-02)**

Chloride, SM4500Cl-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	12/31/2013	ND	400	100	400	11.3		

**Sample ID: SP 2 @ 9 FT (H303121-03)**

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	12/31/2013	ND	400	100	400	11.3		

**Sample ID: SP 4 @ 4 FT (H303121-04)**

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	12/31/2013	ND	400	100	400	11.3		

Cardinal Laboratories

\* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

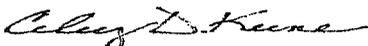
- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- \*\* Samples not received at proper temperature of 6°C or below.
- \*\*\* Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C  
Samples reported 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



April 22, 2014

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

RE: SKELLY #975

Enclosed are the results of analyses for samples received by the laboratory on 04/21/14 16:55.

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\\_accred\\_certif.html](http://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,



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:	04/21/2014	Sampling Date:	04/21/2014
Reported:	04/22/2014	Sampling Type:	Soil
Project Name:	SKELLY #975	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Celey D. Keene
Project Location:	LOCO HILLS, NM		

**Sample ID: NORTH SIDEWALL (H401197-01)**

Chloride, SM4500Cl-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	04/22/2014	ND	416	104	400	0.00		

**Sample ID: SOUTH SIDEWALL (H401197-02)**

Chloride, SM4500Cl-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	04/22/2014	ND	416	104	400	0.00		

**Sample ID: EAST SIDEWALL (H401197-03)**

Chloride, SM4500Cl-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	04/22/2014	ND	416	104	400	0.00		

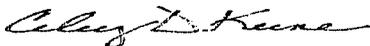
**Sample ID: WEST SIDEWALL (H401197-04)**

Chloride, SM4500Cl-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	04/22/2014	ND	416	104	400	0.00		

Cardinal Laboratories

\* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

### Notes and Definitions

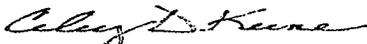
- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- \*\* Samples not received at proper temperature of 6°C or below.
- \*\*\* Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C  
Samples reported on an as received basis (wet) unless otherwise noted on report

---

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\*=Accredited Analyte

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---

Celey D. Keene, Lab Director/Quality Manager



# APPENDIX III

---

**C-141**

*October 2013 and June 2014*

## **Skelly Unit #975 (10/21/2013)**

Unit B, Section 23, Township 17 South, Range 31 East  
Eddy County, NM  
GPS: N 32.82613° W 103.83923°

**Prepared for:**  
COG Operating LLC  
Midland, Texas

**Prepared by:**  
BBC International, Inc.

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	COG OPERATING LLC	Contact	Robert McNeill
Address	600 West Illinois Avenue, Midland, TX 79701	Telephone No.	432-230-0077
Facility Name	Skelly Unit #975	Facility Type	Well Pad
Surface Owner	Federal	Mineral Owner	
		Lease No. (API#) 30-015-36356	

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
B	23	17S	31E					Eddy

Latitude 32.82599 Longitude 103.83930

**NATURE OF RELEASE**

Type of Release	Oil and produced water	Volume of Release	5bbls of oil	Volume Recovered	5bbls of produced water
Source of Release	Chemical injection line on well.	Date and Hour of Occurrence	10-21-2013	Date and Hour of Discovery	10-21-2013 3:40pm
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?			
By Whom?		Date and Hour			
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.			

**NM OIL CONSERVATION**  
ARTESIA DISTRICT

JUN 06 2014

RECEIVED

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*  
A stainless steel 90 on the chemical injection line broke. Replace the stainless steel 90.

Describe Area Affected and Cleanup Action Taken.\*  
Initially an estimated 5bbls of oil and 5bbls of produced water were released from a stainless steel 90. We were able to recover 4bbl of oil and 2bbls of produced water with a vacuum truck. The spill was located on the well pad. BBC will sample the spill site area to delineate any possible contamination from the release and we will present a work plan to the BLM/NMOCD for approval prior to any significant remediation work.

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:		Approved by District Supervisor:	
Printed Name:	Robert Grubbs Jr.	Approval Date:	Expiration Date:
Title:	Senior Environmental Coordinator	Conditions of Approval:	
E-mail Address:	rgrubbs@concho.com	Attached <input type="checkbox"/>	
Date:	10-25-2013	Phone:	432-661-6601

\* 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  
200 Rio Brazos Road, Aztec, NM 87410  
District IV  
20 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	COG OPERATING LLC	Contact	Robert McNeill
Address	600 West Illinois Avenue, Midland, TX 79701	Telephone No.	432-230-0077
Facility Name	Skelly Unit #975	Facility Type	Well Pad
Surface Owner	Federal	Mineral Owner	API No. 30-015-36356

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
B	23	17S	31E					Eddy

Latitude N 32.82599° Longitude W 103.83930°

**NATURE OF RELEASE**

Type of Release	Oil and Produced water	Volume of Release	5 bbls oil and 5 bbls of produced water	Volume Recovered	4 bbls oil and 2 bbls produced water
Source of Release	Chemical injection line on well	Date and Hour of Occurrence	10/21/2013	Date and Hour of Discovery	10/21/2013 @ 3:40 pm
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?			
By Whom?		Date and Hour			
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.\*

**NM OIL CONSERVATION**  
ARTESIA DISTRICT

JUN 06 2014

Describe Cause of Problem and Remedial Action Taken.\*

A stainless steel 90 on the chemical injection line broke. Replaced the stainless steel 90.

RECEIVED

Describe Area Affected and Cleanup Action Taken.\*

Initially an estimated 5 bbls of oil and 5 bbls of produced water were released from a stainless steel 90. We were able to recover 4 bbls oil and 2 bbls of produced water with a vacuum truck. The spill was located on the well pad. Remediation was completed in accordance with a remediation plan approved verbally by Mike Bratcher of NMOCD and approved by Mike Burton of the BLM via email on 02/26/2014.

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:

Printed Name: Robert Grubbs Jr.

Approved by Environmental Specialist:

Title: Senior Environmental Coordinator

Approval Date:

Expiration Date:

E-mail Address: rgrubbs@concho.com

Conditions of Approval:

Attached

Date: 6-4-14

Phone: (432) 661-6601

\* Attach Additional Sheets If Necessary

# APPENDIX IV

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**Correspondence**  
*February 2014*

## **Skelly Unit #975 (10/21/2013)**

Unit B, Section 23, Township 17 South, Range 31 East  
Eddy County, NM  
GPS: N 32.82613° W 103.83923°

**Prepared for:**  
COG Operating LLC  
Midland, Texas

**Prepared by:**  
BBC International, Inc.

## Kathy Purvis

---

**From:** Cliff P. Brunson <cbrunson@bbcinternational.com>  
**Sent:** Tuesday, February 25, 2014 6:55 PM  
**To:** Mike Bratcher  
**Cc:** Robert Grubbs; Michelle Mullins; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** Concho (COG) Skelly Unit #975-Remediation Plan  
**Attachments:** Remediation Plan Report, Skelly Unit #975.pdf

Mike,

This e-mail is to confirm our conversation on February 19, 2014 about the remediation plan for the above referenced site. I have attached the materials that we used in our discussion. As discussed, Concho will excavate to a depth of 6 inches in the area covering SP1, SP3, and SP4 as depicted on the attached site diagram. The area around SP2 will be excavated to a depth of 4 feet. The area will then be backfilled.

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

Thanks, Cliff

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

\*\*\*\*\*

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\*\*\*\*\*

**Kathy Purvis**

---

**From:** Cliff P. Brunson <cbrunson@bbcinternational.com>  
**Sent:** Tuesday, February 25, 2014 5:14 PM  
**To:** Mike Burton  
**Cc:** Robert Grubbs; Michelle Mullins; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** Concho (COG) Skelly Unit #975-Remediation Plan  
**Attachments:** Remediation Plan Report, Skelly Unit #975.pdf

Mike,

This e-mail is to request the BLM's approval for the following remediation plan for the above referenced site. I have attached the materials that pertain to the site and the plan. This plan has already been approved by Mike Bratcher of the NMOCD. Concho (COG) will excavate to a depth of 6 inches across the leak area except in the area of SP2 which will be a 4 foot excavation as shown on the attached diagram. 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. If you have any questions, please let us know.

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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\*\*\*\*\*

**Kathy Purvis**

---

**From:** Cliff P. Brunson <cbrunson@bbcinternational.com>  
**Sent:** Wednesday, February 26, 2014 9:11 AM  
**To:** Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** FW: Concho (COG) Skelly Unit #975-Remediation Plan

FYI....BLM approval

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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**From:** Mike Burton <[mburton@blm.gov](mailto:mburton@blm.gov)>  
**Date:** Wednesday, February 26, 2014 6:34 AM  
**To:** Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)>  
**Subject:** Re: Concho (COG) Skelly Unit #975-Remediation Plan

Cliff,

This plan is approved with these stipulations.

1. The area around SP2 should be excavated to at least 4' BGS to remove most of the chloride contamination.
2. We will require side wall confirmation samples to ensure the all horizontal contamination was removed.

Thanks.

**Mike Burton**  
**BLM-CFO**  
**Environmental Protection Specialist**  
**575-234-2226 office**  
**575-361-3574 cell**  
**[mburton@blm.gov](mailto:mburton@blm.gov)**

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On Tue, Feb 25, 2014 at 5:14 PM, Cliff P. Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)> wrote:  
Mike,

This e-mail is to request the BLM's approval for the following remediation plan for the above referenced site. I have attached the materials that pertain to the site and the plan. This plan has already been approved by Mike Bratcher of the NMOCD. Concho (COG) will excavate to a depth of 6 inches across the leak area except in the area of SP2 which will be a 4 foot excavation as shown on the attached diagram. 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. If you have any questions, please let us know.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS  
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