Closure Report

| | Site Description |
|--------------------|-------------------------------|
| Site Name: | Amax 24 Federal #9 |
| Company: | Oxy Permian Ltd. |
| Legal Description: | U/L K, Section 24, T23S, R31E |
| County: | Eddy County, NM |
| GPS Coordinates: | N 32.28728° W 103.73475° |

| | Release Data |
|--------------------|---|
| Date of Release: | 07/10/2014 |
| Type of Release: | Oil and produced water |
| Source of Release: | External corrosion on piping from stuffing box on well head |
| Volume of Release: | 4 bbls oil, 6 bbls produced water |
| Volume Recovered: | 0 bbls |

| | Remediation Specifications |
|----------------------------|---|
| Remediation Parameters: | Excavate the area around SP1 to a depth of 2 feet and place a liner in the excavation. Excavate the area around SP2 to a depth of 1 foot. Surface scrape the area around SP3. Backdrag the overspray area. Backfill the site with clean soil. |
| Remediation Activities: | January 2016 |

| Plan Sent to OCD: | 08/10/2015 | Email from Cliff Brunson to Mike Bratcher |
|-----------------------|------------|---|
| OCD Approval of Plan: | 08/19/2015 | Email from Mike Bratcher to Cliff Brunson |
| Plan Sent to BLM: | 08/19/2015 | Email from Cliff Brunson to Shelly Tucker |
| BLM Approval of Plan: | 08/19/2015 | Email from Shelly Tucker to Cliff Brunson |

| | Supporting Documentation |
|------------------|--|
| Initial C-141 | Signed 07/16/2014 |
| Final C-141 | Signed 02/23/2016 |
| Site Diagram | July 2014 |
| Groundwater Plot | 200' |
| TOPO Maps | July 2014 |
| Lab Summary | 11/05/2014-11/06/2014 and 06/02/2015 |
| Lab Analysis | 11/05/2014-11/06/2014 and 06/02/2015 |
| 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.

02/26/2016

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

JUL 16 2014

RECEIVED

Form C-141 Levised August 8, 2011

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

NNSubmit-1 CORY to appropriate District Office in accordance with 19.15.29 NMAC.

| Release Notifica | atio | and Co | orrective A | ction | | | | |
|--|----------|--------------------------|----------------------------------|-----------------------|--------------|----------------|--|--------------|
| n4mp1420226008 | • | OPERA | TOR | | | al Report | | Final Report |
| Name of Company Oxy Permian Ltd. [6699 | | | Chancey Summe | | | | | |
| Address 1017 W. Stanolind Rd, Hobbs, NM 88240 Facility Name Amax 24 Federal #9 | | Telephone 1 Facility Typ | | -8216 | | | | |
| | | raciity Typ | e wen | | | | | |
| Surface Owner BLM Mineral Ov | wner | | | | API No | o. 30-015-2 | 7411 | |
| | | OF RE | LEASE | | | | | |
| Unit Letter Section Township Range Feet from the | North/ | South Line | Feet from the | East/W | est Line | County | | |
| K 24 23S 31E 1650 | | South | 1650 | v | Vest | Eddy Cour | ity, NM | |
| Latitude <u>N 32.28</u> | 728° | Longitu | de <u>W 103.7347:</u> | 5° | | | | |
| NATU | JRE | OF RELI | EASE | | | | | |
| Type of Release Oil and produced water | | Volume of | Release 4 bbls | oil, | Volume I | Recovered | | |
| Source of Release External corrosion on piping coming off stuffir | | | uced water lour of Occurrence | | 0 bbls | TT CD' | | |
| box on the well head | ng | 07/10/2014 | | e | Date and | Hour of Disc | overy | |
| Was Immediate Notice Given? | wired | If YES, To | Whom? her-NMOCD; So |) Utuaha | . DIM | | | |
| By Whom? Jennifer Gilkey, BBC International | uncu | Date and H | | | | | | |
| Was a Watercourse Reached? | | | lume Impacting th | | | | | |
| ☐ Yes ☒ No | | | | | | | | |
| If a Watercourse was Impacted, Describe Fully.* | | | | | | | | |
| | | | | | 100 | | | |
| | | | | | | | | |
| Describe Cause of Problem and Remedial Action Taken.* | | | | | | | | |
| External correction on vivia and a second of the second of | | | | | | | a. •Mario con contrato de la contrato del contrato del contrato de la contrato del la contrato de la contrato del contrato del la contrato del la contrato d | |
| External corrosion on piping coming off the stuffing box on the well fluids were recovered and the piping was repaired or replaced. | l head o | caused 4 bbls | of oil and 6 bbls | of produ | iced water | to leak onto | the gro | und, No |
| Describe Area Affected and Cleanup Action Taken.* | - | | | | | | | |
| The affected area is approximately 60' x 90' on the north side of the | locatio | n minning off | location into the | nasture | Remedia | tion will be c | omnlete | ed in |
| accordance with a remediation plan approved by NMOCD and the B | LM. | | roomon mio mo | pascino, | reomocita | tion will oo c | omprec | Juliu |
| I hereby certify that the information given above is true and complete | e to the | e best of my k | nowledge and un | derstand | that purs | uant to NMO | CD rul | es and |
| regulations all operators are required to report and/or file certain relepublic health or the environment. The acceptance of a C-141 report | ase no | tifications and | d perform correcti | ive actio | ns for rele | ages which n | nay end | onger |
| should their operations have failed to adequately investigate and rem | ediate | contaminatio | n that nose a three | at to oro | und water | surface wat | er hum | an health |
| or the environment. In addition, NMOCD acceptance of a C-141 rep federal, state, or local laws and/or regulations. | ort do | es not relieve | the operator of re | esponsib | ility for co | mpliance wi | th any c | other |
| reading out to day to the state of the state | | | OIL CONS | ERVA | TION | DIVISIO | V | |
| Signature: | | | <u> </u> | DIC 11 | / | <u> </u> | <u></u>) | |
| organists. | Α. | nnroyed by E | Environmental Spe | agialist | // | | | |
| Printed Name: Chancey Summers | Λ | pproved by E | | ccialist, | 17m | Mu | | |
| Title: HES Advisor | A | pproval Date | : 7/21/14 | / Ex | piration D | Date: N | A | |
| E-mail Address: Chancey.Summers@oxy.com | C | onditions of A | Approval: | A. C. PERSON AND SEC. | | | | |
| 0 11 11/ | _ | | per OCD Rule & | Guide | ines, & | Attached | | |
| Date: Phone: (575) 397-8216 Attach Additional Sheets If Necessary | like | | y BLM. <u>SUBMIT</u> | | | L | | |
| The state of the s | | PROP | SIZI// | THAN: | | ZR | P- | 2379 |
| | | | 0101119 | | | | | , |

District I
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1000 Rio Brazos Road, Aztec, NM 87410
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1220 S. St. Francis Dr., Santa Fe, NM 87505

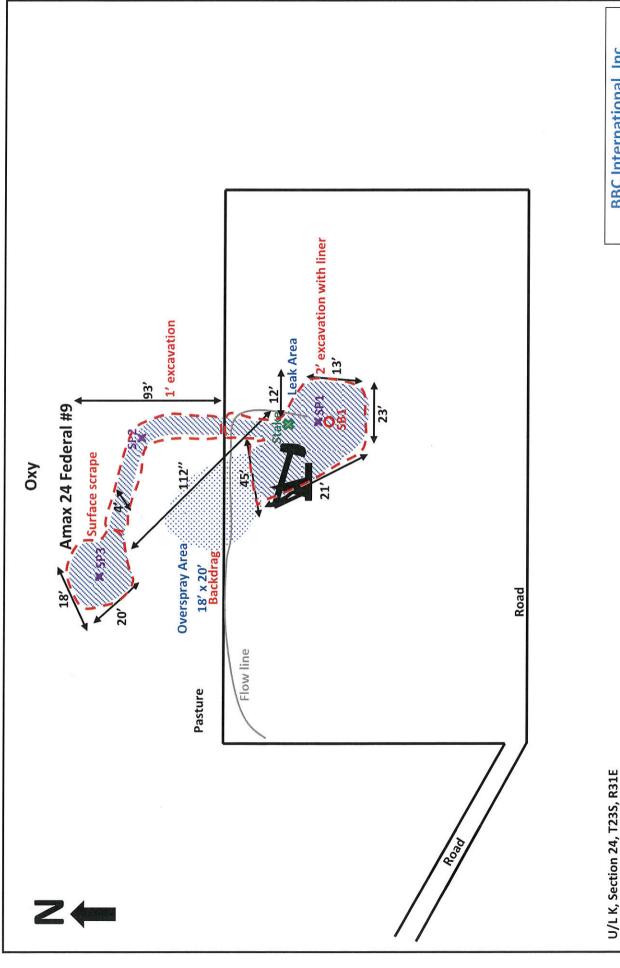
State of New Mexico Energy Minerals and Natural Resources

Form C-141
Revised August 8, 2011
ait 1 Copy to appropriate District Office in

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.

| | | | Dol | ease Notific | ADDITION OF THE PARTY OF | n and Ca | | otion | ************************************** | | |
|--------------------------|-------------------------------|--|--------------|---|--------------------------|------------------------------------|---------------------------------------|-----------|--|---------------------------------|-----------------------|
| | | | Kei | ease mount | catto | | | etior | | 20000 | |
| Name of Co | mnany | Oxy Permia | n I td | | | OPERA? | Casey Summers | | Initia | al Report | ✓ Final Repor |
| | | ive, Midland | | 05 | | Telephone N | | -8289 | | | |
| Facility Na | | x 24 Federal | | | | Facility Typ | | 0207 | | | |
| Surface Ow | ner BLN | <u></u> | | Mineral C |)wner | | | | API No | . 30-015-2741 | 1 |
| Surrace on | 52. | | | | | | | | AIIII | . 50-015-2741 | 1 |
| Unit Letter | Section | Township | Range | Feet from the | | N OF REI | | F4/3 | V I : | C | |
| Oint Letter | Section | Township | Kange | reet from the | Norti | /South Line | Feet from the | East/V | West Line | County | |
| K | 24 | 23S | 31E | 1650 | | South | 1650 | , | West | Eddy County, | NM |
| | | | 1 | Latitude N 32.2 | 28728° | Longitu | de <u>W 103.7347</u> ; | <u>5°</u> | | | |
| | | | | NAT | HRE | OF RELI | FASE | | | | |
| Type of Rele | ase Oil ar | nd produced w | vater | IMI | UKE | Volume of | - 19-12 (242-101-01) | oil. | Volume R | Recovered | |
| C CD | | | | | | 6 bbls prod | uced water | | 0 bbls | | |
| Source of Rel | | ernal corrosion | n on pipin | g coming off stuf | fing | Date and H 07/10/2014 | our of Occurrenc | е | Date and | Hour of Discove | ry |
| Was Immedia | | The state of the s | Y | | | If YES, To | Whom? | | | | |
| | | | | No Not Re | equired | | her-NMOCD; So | | | | |
| By Whom? Was a Watero | | ilkey, BBC In | ternationa | ւլ | | Date and H | | | | | |
| was a water | course Reac | | Yes 🛛 | No | | II 1 ES, VO | lume Impacting the | ne wate | ercourse. | | |
| If a Watercou | rse was Imi | pacted. Descri | be Fully * | • | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| Describe Cau | se of Proble | m and Remed | lial Action | ı Taken.* | | | | | | | |
| External corro | osion on pip | ing coming of | ff the stuff | fing box on the wo | ell heac | l caused 4 bbls | of oil and 6 bbls | of prod | uced water | to leak onto the | ground. No |
| fluids were re | covered and | I the piping w | as repaire | d or replaced. | | | | i. | | | S |
| Describe Area | a Affected a | nd Cleanup A | ction Tak | en.* | | | | | | | |
| | | • | | | | | | | | | |
| The affected a | irea is appro ith the reme | xımately 60' diation plan a | x 90'on th | ne north side of th by Mike Bratcher | e locati | ion running off OCD via email | f location into the | pasture | e. Remediat | tion was comple | ted in |
| email on 08/1 | | aration plan a | pproved | y wince Bratefiel | OI I VIVI | SCB via cinan | 011 00/17/2015 al | па аррг | oved by Sin | city fucker of th | ie beivi via |
| I haraby cartif | Sy that the ir | formation air | ion aborio | is two and samul | 242 42 4 | h a h a st = £ 1 | 1 | 1 | 1.0 | NIMOOD | |
| regulations all | ly that the if operators a | re required to | report an | is true and compl d/or file certain re | ete to ti elease n | ne best of my i otifications an | cnowiedge and ur d perform correct | iderstan | id that pursi ons for rele | aant to NMOCD ases which mav | rules and endanger |
| public health | or the enviro | onment. The a | acceptance | e of a C-141 repor | rt by the | e NMOCD ma | rked as "Final Re | eport" de | oes not relie | eve the operator | of liability |
| should their of | perations ha | ve failed to ac | dequately | investigate and re ance of a C-141 r | emediat | e contaminatio | on that pose a thre | at to gr | ound water, | surface water, l | numan health |
| federal, state, | or local law | s and or regul | lations. | ance of a C-141 I | eport u | oes not reneve | the operator of re | esponsi | bility for co | mphance with a | ny otner |
| | | | | | | | OIL CONS | SERV | ATION I | DIVISION | |
| Signature: | In | /- | | | | | | | | | |
| | V | | | | | Approved by I | Environmental Sp | ecialist | : | | |
| Printed Name: | Casey S | ummers | | | | | | | • | | |
| Title: NM E | Environmen | al Advisor | | | | Approval Date | 1 | E | Expiration D | Date: | |
| E-mail Addres | es. Casev | Summers@ox | vv com | | | Conditions of | A nnraval: | • | | | |
| L-man Addres | os. <u>Casey</u> . | 10 | Cy.COIII | | | Conditions of | Approvai: | | | Attached | |
| Date: 2 | -23 | - 16 | Phone: | (575) 513-8289 |) | | | | | | |

^{*} Attach Additional Sheets If Necessary



Oxy
Amax 24 Federal #9

Date: 07/25/2014

NOT TO SCALE File: Oxy 2014

SB1-Soil Boring at N 32.28719° W 103.73468°

N 32.28728° W 103.73475°

Eddy County, NM

API# 30-015-27411



Groundwater Plot

Oxy AMAX 24 Federal #9

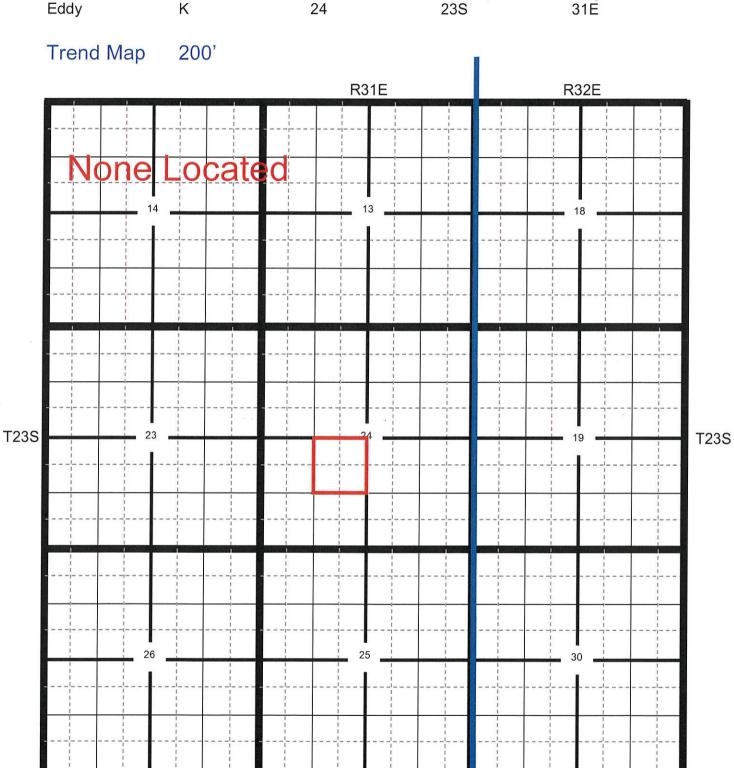
County Eddy

Unit Letter

Section

Township

Range 31E



Location

OCD

USGS

R31E

• SEO

All Databases

R32E



Section Quarters

Oxy AMAX 24 Federal #9

CountyUnit LetterSectionTownshipRangeEddyK2423S31E

Trend Map 200'

1

| NW/NW | NE/NW | NW/NE | NENE |
|-----------------------------|---------------|------------------|------------------|
| 1 | | 3 5 6 9 | 1 1 1 1 |
| None Lo | ocated | | |
| | | | |
| 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 |
| NWYSW | NE/SW | NW/SE | NEZSE |
| Unit Letter L | Unit Letter K | Unit Letter J | Unit Letter I |
| SW/SW | SE/SW | SW/SE | SE/SE |
| Unit L ^l etter M | II. II II. N | | 1 |
| Omi Better Wi | Unit Letter N | Unit Letter O | Unit Letter P |

3

4

Location

OCD

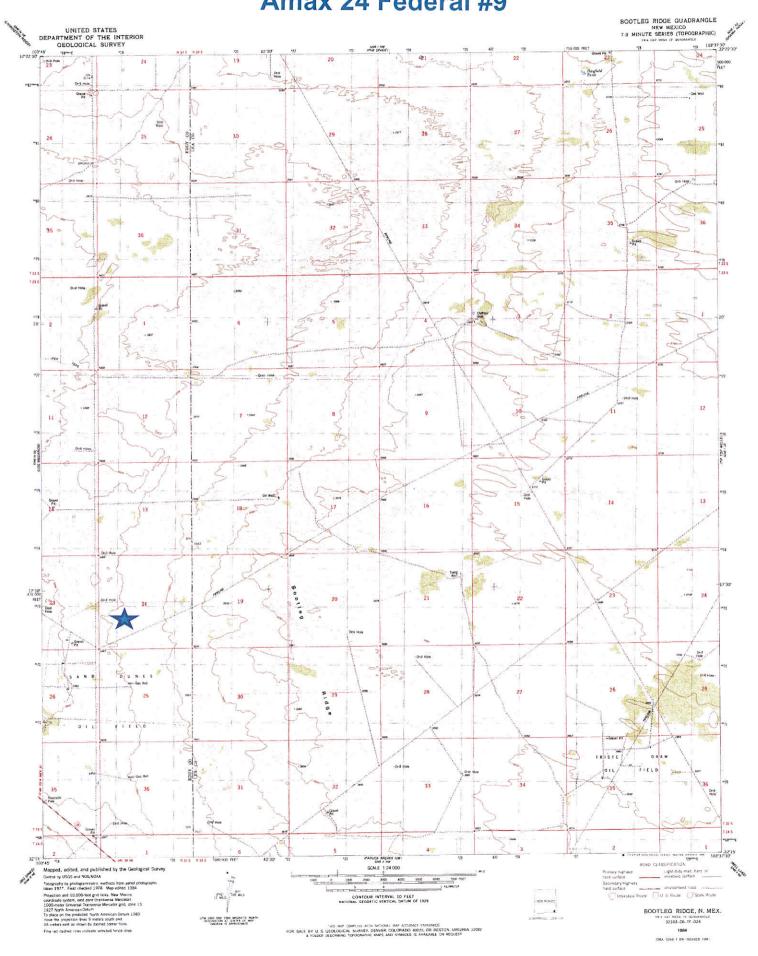
USGS

SEO

All Databases

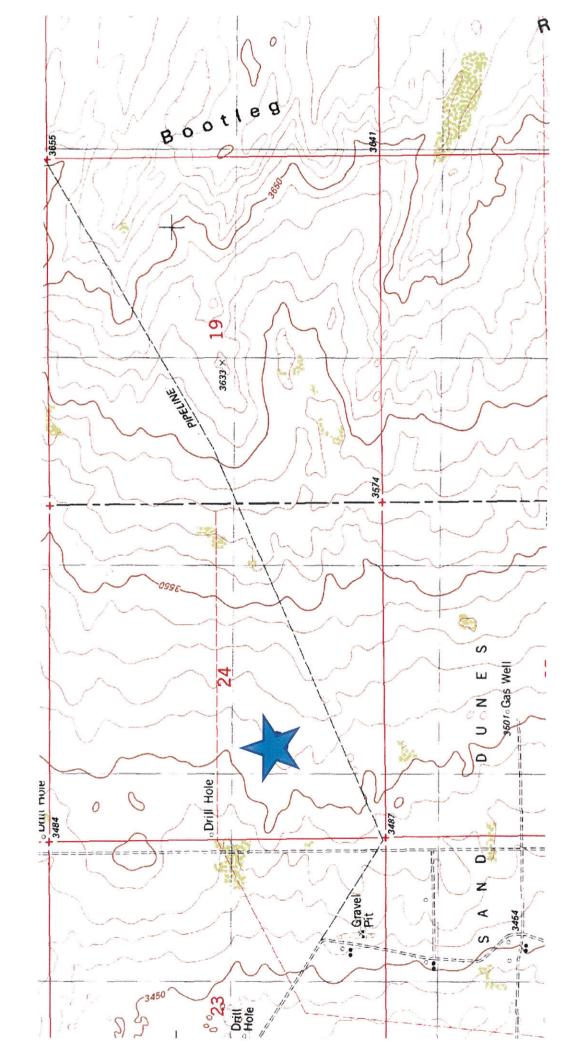
Оху

Amax 24 Federal #9



Oxy

Amax 24 Federal #9



Laboratory Analytical Results Summary Amax 24 Federal #9

| | | Sample | SP1 @ 1' | SP1 @ 3' | SP1 @ 5' | SP1 @ 10' | SP1 @ 15. | SP1 @ 18' |
|--------------------------|------------------|--------|----------|----------|----------|-----------|-----------|-----------|
| Analyte | Method | Date | 11/5/14 | 11/5/14 | 11/5/14 | 11/5/14 | 11/5/14 | 11/5/14 |
| | | | mg/Kg | mg/Kg | mg/Kg | mg/Kg | mg/Kg | ma/Ka |
| Benzene | BTEX 8021B | | <0.050 | <0.050 | n/a | n/a | n/a | n/a |
| Toluene | BTEX 8021B | | <0.050 | <0.050 | n/a | n/a | n/a | n/a |
| Ethylbenzene | BTEX 8021B | | <0.050 | <0.050 | n/a | n/a | n/a | n/a |
| Total Xylenes BTEX 8021B | BTEX 8021B | | <0.150 | <0.150 | n/a | n/a | n/a | n/a |
| Total BTEX | BTEX 8021B | | <0.300 | <0.300 | n/a | n/a | n/a | n/a |
| Chloride | SM4500CI-B | | 4880 | 1180 | 3400 | 3640 | 2840 | 3520 |
| GRO | TPH 8015M | | <10.0 | <10.0 | n/a | n/a | n/a | n/a |
| DRO | TPH 8015M | | <10.0 | <10.0 | n/a | n/a | n/a | n/a |

| | | Sample | SP2 @ 1' | SP2 @ 2' |
|---------------|------------|--------|----------|----------|
| Analyte | Method | Date | 11/6/14 | 11/6/14 |
| | | | mg/Kg | mg/Kg |
| Benzene | BTEX 8021B | | <0.500 | <0.050 |
| Toluene | BTEX 8021B | | <0.500 | <0.050 |
| Ethylbenzene | BTEX 8021B | | 0.602 | <0.050 |
| Total Xylenes | BTEX 8021B | | 4.79 | 0.24 |
| Total BTEX | BTEX 8021B | | 5.39 | <0.300 |
| Chloride | SM4500CI-B | | 736 | 1920 |
| GRO | TPH 8015M | | 288 | 65.8 |
| DRO | TPH 8015M | | 6560 | 1430 |

| | | Sample | SP3 @ 1. | SP3 @ 2' |
|----------------------|------------------|--------|----------|----------|
| Analyte | Method | Date | 11/6/14 | 11/6/14 |
| | | | mg/Kg | mg/Kg |
| Benzene | BTEX 8021B | | <0.050 | <0.050 |
| Toluene | BTEX 8021B | | <0.050 | <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 | | <16.0 | <16.0 |
| GRO | TPH 8015M | | <10.0 | <10.0 |
| DRO | TPH 8015M | | 134 | 14.4 |

Laboratory Analytical Results Summary AMAX 24 Federal #9

| | | Sample | SB1 @ 20' | SB1 @ 22-23 | SB1 @ 25' | SB1 @ 30' |
|----------|------------|--------|-----------|----------------|-----------|-----------|
| Analyte | Method | Date | 6/2/15 | 6/2/15 | 6/2/15 | 6/2/15 |
| | | | mg/Kg | mg/Kg | mg/Kg | mg/Kg |
| Chloride | SM4500CI-B | | 1700 | 768 | 720 | 208 |



November 13, 2014

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: AMAX 24 FEDERAL #9

Enclosed are the results of analyses for samples received by the laboratory on 11/10/14 8:35.

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 accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2

Haloacetic Acids (HAA-5)

Method EPA 524.2

Total Trihalomethanes (TTHM)

Method EPA 524.4

Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

Celeg D. Keine

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Lab Director/Quality Manager



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

Fax To:

(575) 397-0397

Received:

11/10/2014

Reported:

11/13/2014

Project Name:

AMAX 24 FEDERAL #9

Project Number:

Project Location:

NOT GIVEN

EDDY COUNTY NM

Sampling Date:

11/05/2014

Sampling Type:

Soil

Sampling Condition:

Cool & Intact

Sample Received By:

Jodi Henson

Sample ID: SP 1 @ 1 (H403440-01)

| BTEX 8021B | mg/ | kg | Analyze | ed By: ms | | | | | |
|--------------------------------------|--------|-----------------|-----------------|--------------|------|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Benzene* | <0.050 | 0.050 | 11/11/2014 | ND | 1.93 | 96.4 | 2.00 | 2.55 | |
| Toluene* | <0.050 | 0.050 | 11/11/2014 | ND | 1.84 | 92.0 | 2.00 | 4.09 | |
| Ethylbenzene* | <0.050 | 0.050 | 11/11/2014 | ND | 1.79 | 89.4 | 2.00 | 2.84 | |
| Total Xylenes* | <0.150 | 0.150 | 11/11/2014 | ND | 5.38 | 89.7 | 6.00 | 2.96 | |
| Total BTEX | <0.300 | 0.300 | 11/11/2014 | ND | | | | | |
| Surrogate: 4-Bromofluorobenzene (PIL | 96.5 | % 61-154 | ! | | | | | | |
| Chloride, SM4500CI-B | mg/ | kg | Analyze | d By: AP | | | | | |
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 4880 | 16.0 | 11/11/2014 | 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 | 11/10/2014 | ND | 191 | 95.4 | 200 | 1.42 | |
| DRO >C10-C28 | <10.0 | 10.0 | 11/10/2014 | ND | 196 | 98.2 | 200 | 2.36 | |
| Surrogate: 1-Chlorooctane | 112 % | 6 47.2-15 | 7 | | | | | | |
| Surrogate: 1-Chlorooctadecane | 116 % | 6 52.1-170 | 6 | | | | | | |

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 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.

alegat treene -

Celey D. Keene, Lab Director/Quality Manager



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

Fax To: (575) 397-0397

Received:

11/10/2014

Sampling Date:

11/05/2014

Soil

Reported:

11/13/2014

Sampling Type:

Cool & Intact

Project Name:

AMAX 24 FEDERAL #9 NOT GIVEN

Sampling Condition: Sample Received By:

Jodi Henson

Project Number: Project Location:

EDDY COUNTY NM

Sample ID: SP 1 @ 3 (H403440-02)

| BTEX 8021B | mg/ | kg | Analyze | d By: ms | | | | | |
|--------------------------------------|--------|-----------------|-----------------|--------------|------|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Benzene* | <0.050 | 0.050 | 11/12/2014 | ND | 1.80 | 90.1 | 2.00 | 5.78 | |
| Toluene* | <0.050 | 0.050 | 11/12/2014 | ND | 1.71 | 85.5 | 2.00 | 6.87 | |
| Ethylbenzene* | <0.050 | 0.050 | 11/12/2014 | ND | 1.65 | 82.7 | 2.00 | 9.28 | |
| Total Xylenes* | <0.150 | 0.150 | 11/12/2014 | ND | 4.94 | 82.3 | 6.00 | 9.77 | |
| Total BTEX | <0.300 | 0.300 | 11/12/2014 | ND | | | | | |
| Surrogate: 4-Bromofluorobenzene (PIL | 96.4 | % 61-154 | er | | | | | | |
| Chloride, SM4500CI-B | mg/ | kg | Analyzed By: AP | | | | | | |
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 1180 | 16.0 | 11/11/2014 | 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 | 11/10/2014 | ND | 191 | 95.4 | 200 | 1.42 | |
| DRO >C10-C28 | <10.0 | 10.0 | 11/10/2014 | ND | 196 | 98.2 | 200 | 2.36 | |
| Surrogate: 1-Chlorooctane | 102 % | 6 47.2-157 | 7 | | | | | | |
| Surrogate: 1-Chlorooctadecane | 106 % | 52.1-170 | 5 | | | | | | |

Sample ID: SP 1 @ 5 (H403440-03)

| Chloride, SM4500CI-B | mg/kg | | Analyze | d By: AP | | | | | |
|----------------------|--------|-----------------|------------|--------------|-----|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 3400 | 16.0 | 11/11/2014 | ND | 416 | 104 | 400 | 0.00 | |

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 whistoever 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 claims 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.

Celeg & France



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

Fax To:

(575) 397-0397

Received:

11/10/2014

Sampling Date:

11/05/2014

Reported:

11/13/2014

Sampling Type:

Soil

Project Name:

AMAX 24 FEDERAL #9

Sampling Condition:

Cool & Intact

Project Number:

NOT GIVEN

Sample Received By:

Jodi Henson

Project Location:

Analyte

Analyte

Analyte

EDDY COUNTY NM

Sample ID: SP 1 @ 10 (H403440-04)

Chloride, SM4500CI-B

mg/kg

mg/kg

Analyzed By: AP

BS

416

BS

416

True Value QC

RPD

Qualifier

Chloride

Result 3640

16.0

Reporting Limit

11/11/2014

Analyzed

Analyzed

Method Blank

ND

Method Blank

ND

% Recovery

104

400

Sample ID: SP 1 @ 15 (H403440-05)

Chloride, SM4500CI-B

Reporting Limit

Reporting Limit

16.0

Analyzed By: AP

0.00

Qualifier

Chloride

Chloride

Result 2840

16.0

11/11/2014

104

% Recovery

104

True Value QC 400

RPD

0.00

Sample ID: SP 1 @ 18 (H403440-06)

Chloride, SM4500Cl-B

mg/kg

Result

3520

Analyzed By: AP

Analyzed 11/11/2014 Method Blank ND

BS % Recovery 416

True Value QC 400

RPD 0.00 Qualifier

Cardinal Laboratories

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Celegy trans-

Celey D. Keene, Lab Director/Quality Manager

Page 4 of 10



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

Fax To: (575) 397-0397

Received:

11/10/2014

Sampling Date:

11/06/2014

Reported:

11/13/2014

Sampling Type:

Soil

Project Name:

AMAX 24 FEDERAL #9

Sampling Condition:

Cool & Intact

Project Number:

NOT GIVEN

Sample Received By:

Jodi Henson

Project Location:

EDDY COUNTY NM

Sample ID: SP 2 @ 1 (H403440-07)

| BTEX 8021B | mg/ | kg | Analyze | ed By: ms | | | | | |
|--------------------------------------|--------|-----------------|-----------------|--------------|------|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Benzene* | <0.500 | 0.500 | 11/12/2014 | ND | 1.80 | 90.1 | 2.00 | 5.78 | |
| Toluene* | <0.500 | 0.500 | 11/12/2014 | ND | 1.71 | 85.5 | 2.00 | 6.87 | |
| Ethylbenzene* | 0.602 | 0.500 | 11/12/2014 | ND | 1.65 | 82.7 | 2.00 | 9.28 | |
| Total Xylenes* | 4.79 | 1.50 | 11/12/2014 | ND | 4.94 | 82.3 | 6.00 | 9.77 | |
| Total BTEX | 5.39 | 3.00 | 11/12/2014 | ND | | | | | |
| Surrogate: 4-Bromofluorobenzene (PIL | 102 % | 61-154 | ! | | | | | | |
| Chloride, SM4500CI-B | mg/kg | | Analyzed By: AP | | | | | | |
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 736 | 16.0 | 11/11/2014 | ND | 416 | 104 | 400 | 0.00 | |
| TPH 8015M | mg/ | kg | Analyzed By: ms | | | | | | S-06 |
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| GRO C6-C10 | 588 | 100 | 11/10/2014 | ND | 191 | 95.4 | 200 | 1.42 | |
| DRO >C10-C28 | 6560 | 100 | 11/10/2014 | ND | 196 | 98.2 | 200 | 2.36 | |
| Surrogate: 1-Chlorooctane | 176 % | 6 47.2-15 | 7 | | | | | | |
| Surrogate: 1-Chlorooctadecane | 205 % | 6 52.1-17 | 6 | | | | | | |

Cardinal Laboratories

*=Accredited Analyte

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Celeg to treene



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

Fax To: (575) 397-0397

Received:

11/10/2014

Sampling Date:

11/06/2014

Reported:

Sampling Type:

Soil

11/13/2014

Sampling Condition:

Cool & Intact

Project Name:

AMAX 24 FEDERAL #9

Sample Received By:

Jodi Henson

Project Number:

NOT GIVEN

Project Location: **EDDY COUNTY NM**

Sample ID: SP 2 @ 2 (H403440-08)

| BTEX 8021B | mg/ | 'kg | Analyze | ed By: ms | | | | | |
|--------------------------------------|--------|-----------------|-----------------|--------------|------|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Benzene* | <0.050 | 0.050 | 11/12/2014 | ND | 1.80 | 90.1 | 2.00 | 5.78 | |
| Toluene* | <0.050 | 0.050 | 11/12/2014 | ND | 1.71 | 85.5 | 2.00 | 6.87 | |
| Ethylbenzene* | <0.050 | 0.050 | 11/12/2014 | ND | 1.65 | 82.7 | 2.00 | 9.28 | |
| Total Xylenes* | 0.240 | 0.150 | 11/12/2014 | ND | 4.94 | 82.3 | 6.00 | 9.77 | |
| Total BTEX | <0.300 | 0.300 | 11/12/2014 | ND | | | | | |
| Surrogate: 4-Bromofluorobenzene (PIL | 101 9 | % 61-154 | | | | | | | |
| Chloride, SM4500CI-B | mg/ | kg | Analyze | d By: AP | | | | | |
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 1920 | 16.0 | 11/11/2014 | 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 | 65.8 | 50.0 | 11/10/2014 | ND | 191 | 95.4 | 200 | 1.42 | |
| DRO >C10-C28 | 1430 | 50.0 | 11/10/2014 | ND | 196 | 98.2 | 200 | 2.36 | |
| Surrogate: 1-Chlorooctane | 129 % | 6 47.2-157 | 7 | | | | | | |
| Surrogate: 1-Chlorooctadecane | 145 % | 52.1-170 | 5 | | | | | | |

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

Fax To: (575) 397-0397

Received:

11/10/2014

Reported:

11/13/2014

Project Name:

AMAX 24 FEDERAL #9

Project Number:

NOT GIVEN

Project Location:

EDDY COUNTY NM

Sampling Date:

11/06/2014

Sampling Type:

Soil

Sampling Condition:

Cool & Intact

Sample Received By:

Jodi Henson

Sample ID: SP 3 @ 1 (H403440-09)

| BTEX 8021B | mg/ | kg | Analyze | ed By: ms | | | | | |
|--------------------------------------|---------|-----------------|-----------------|--------------|------|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Benzene* | <0.050 | 0.050 | 11/12/2014 | ND | 1.80 | 90.1 | 2.00 | 5.78 | |
| Toluene* | < 0.050 | 0.050 | 11/12/2014 | ND | 1.71 | 85.5 | 2.00 | 6.87 | |
| Ethylbenzene* | < 0.050 | 0.050 | 11/12/2014 | ND | 1.65 | 82.7 | 2.00 | 9.28 | |
| Total Xylenes* | <0.150 | 0.150 | 11/12/2014 | ND | 4.94 | 82.3 | 6.00 | 9.77 | |
| Total BTEX | <0.300 | 0.300 | 11/12/2014 | ND | | | | | |
| Surrogate: 4-Bromofluorobenzene (PIL | 98.2 9 | % 61-154 | | | | | | | |
| 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 | 11/11/2014 | 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 | 11/11/2014 | ND | 186 | 93.2 | 200 | 4.80 | |
| DRO >C10-C28 | 134 | 10.0 | 11/11/2014 | ND | 193 | 96.4 | 200 | 6.00 | |
| Surrogate: 1-Chlorooctane | 107 % | 6 47.2-157 | 7 | | | | | | |
| Surrogate: 1-Chlorooctadecane | 119 % | 52.1-170 | 5 | | | | | | |

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*=Accredited Analyte

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

Fax To:

(575) 397-0397

Received: Reported: 11/10/2014

11/13/2014

AMAX 24 FEDERAL #9

Project Name: Project Number: Project Location:

NOT GIVEN

EDDY COUNTY NM

Sampling Date:

11/06/2014

Sampling Type:

Soil

Sampling Condition:

Cool & Intact

Sample Received By:

Jodi Henson

Sample ID: SP 3 @ 2 (H403440-10)

| BTEX 8021B | mg/ | kg | Analyze | ed By: ms | | | | | |
|--------------------------------------|---------|-----------------|-----------------|--------------|------|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Benzene* | <0.050 | 0.050 | 11/12/2014 | ND | 1.80 | 90.1 | 2.00 | 5.78 | |
| Toluene* | < 0.050 | 0.050 | 11/12/2014 | ND | 1.71 | 85.5 | 2.00 | 6.87 | |
| Ethylbenzene* | < 0.050 | 0.050 | 11/12/2014 | ND | 1.65 | 82.7 | 2.00 | 9.28 | |
| Total Xylenes* | < 0.150 | 0.150 | 11/12/2014 | ND | 4.94 | 82.3 | 6.00 | 9.77 | |
| Total BTEX | <0.300 | 0.300 | 11/12/2014 | ND | | | | | |
| Surrogate: 4-Bromofluorobenzene (PIL | 101 % | 6 61-154 | | | | | | | |
| 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 | 11/11/2014 | 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 | 11/11/2014 | ND | 186 | 93.2 | 200 | 4.80 | |
| DRO >C10-C28 | 14.4 | 10.0 | 11/11/2014 | ND | 193 | 96.4 | 200 | 6.00 | |
| Surrogate: 1-Chlorooctane | 117 % | 6 47.2-157 | 7 | | | | | | |
| Surrogate: 1-Chlorooctadecane | 125 % | 52.1-170 | 5 | | | | | | |

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*=Accredited Analyte

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Notes and Definitions

S-06 The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.

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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Celegat Keine



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

| Company Name: | Company Name: BBC International, Inc. | .0042-0 | BILL TO | ANALYSIS REQUEST |
|---|--|---|--|--|
| Project Manager: Cliff Brunson | Cliff Brunson | | P.O. #: | |
| Address: P.O. Box 805 | Box 805 | | Company: | |
| city: Hobbs | State: NM 2 | Zip: 88241 | Attn: | |
| Phone #: 575-397-6388 | Fax #: | 575-397-0397 | Address: | |
| Project #: | Project Owner: | 6XV | City: The | |
| Project Name: | Amax 24 Fellin | S # 1 | State: Zip: | |
| Project Location: | C-29 | | Phone #: | |
| Sampler Name: | 0.0 | - | Fax#: | <i>y</i> |
| FOR LAB USE ONLY | | MATRIX | PRESERV. SAMPLING | 7 |
| Lab I.D. | Sample I.D. | UDGE | HER: ID/BASE: E / COOL HER: | CLTPH |
| OPHCOPH | | GRC WAS SOIL OIL SLUI | ACIE | |
| 2 | s of the | N N N N N N N N N N N N N N N N N N N | 150/ C=// | 777 |
| W | 52 | 7 | 1/2// | × |
| r | 0/0 | Z Z | () | × |
| 5 | 510 | | 196 | × - |
| 6 | 6/8 | N X | ON A Y | |
| 1 | 19205 | V V V | 658 9-11 1 | X |
| 8 | 102 | | 526 | XXX |
| مہ ج | 5p361 | X | 8511 4 | × |
| 10 | , 60 | | P / 100 | 10 X X |
| analyses. All claims including service in 70 event shall Car | PLEASE MOTE: Labeling and Damages. Cardena's labeling and clearly sexclasive remote for any dates arising whether based in contract or for, thall be limited to the amount paid by the clearl for the analyses. All claims suchding flower programs any other cardians what are stated to deerned waved unless new in writing and received by Cardinal white Days after contractions and applicable service. In no event shall Cardinal be later labels for incidenal or consequents unlaterage, including without limitation, business fails introduced to so of notific through the claim and the consequents white the contraction white the contraction of t | y clain artsing whether based in contract o eerned waived unless made in writing and o without limitation, business interruptions, to | ir lort, shall be limited to the amount paid by the client received by Cardinat within 30 days after completion own of team or loss of profils incurred by client, its subsists of team or loss of profils incurred by client, its subsists. | t for the opplicable |
| service in no event shall Car | rdinal be liable for incidental or consequental damages, including a | without limitation, business interruptions, lo | ex of use or loss of profits incurred by client, its subsi | in the state of th |

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2466

Sampler - UPS - Bus - Other:

Delivered By: (Circle One)

Relinquished By:

1-10-14 8100

> Regeived By: Lanne

> > - Geller

Phone Result: Fax Result: REMARKS:

☐ Yes

O O

Add'l Phone #: Add'l Fax #:

enne



June 10, 2015

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: AMAX 24 FEDERAL #9

Enclosed are the results of analyses for samples received by the laboratory on 06/03/15 11:45.

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.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2

Haloacetic Acids (HAA-5)

Method EPA 524.2

Total Trihalomethanes (TTHM)

Method EPA 524.4

Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

Celeg D. Keine

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Lab Director/Quality Manager



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

Fax To:

(575) 397-0397

Received:

06/03/2015

Sampling Date: Sampling Type: 06/02/2015

Reported:

06/10/2015

BS

432

Soil

Project Name:

AMAX 24 FEDERAL #9

Sampling Condition:

Cool & Intact

Project Number:

NONE GIVEN

Sample Received By:

Jodi Henson

Project Location:

EDDY COUNTY NM

Sample ID: SB 1 @ 20' (H501421-01)

Chloride, SM4500CI-B

Chloride

Chloride

Chloride

Chloride

mg/kg

Analyzed By: AP

Analyte

Result Reporting Limit

1700

768

Result

720

Analyzed Method Blank 06/08/2015 ND

108

% Recovery

True Value QC 400

RPD

0.00

Qualifier

Sample ID: SB 1 @ 22-23' (H501421-02)

Chloride, SM4500CI-B

Analyzed By: AP

Analyte

Analyte

Reporting Limit Result

16.0

16.0

Reporting Limit

16.0

Analyzed 06/08/2015 Method Blank ND

BS 432 % Recovery 108

108

True Value QC

400

400

RPD

Qualifier

Sample ID: SB 1 @ 25' (H501421-03)

Chloride, SM4500CI-B

Analyzed

06/08/2015

Analyzed By: AP

Method Blank

ND

BS % Recovery True Value QC

RPD

0.00

Qualifier

0.00

Sample ID: SB 1 @ 30' (H501421-04)

Chloride, SM4500Cl-B

mg/kg

Analyzed By: AP

Analyte

Result

208

Reporting Limit Analyzed 16.0 06/08/2015 Method Blank

ND

BS 432

432

% Recovery 108

True Value QC 400

RPD 0.00 Oualifier

Cardinal Laboratories

*=Accredited Analyte

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Celeg & trans

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 SM4500CI-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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Celeg & France



| Company Name: BBC | BBC International, Inc. | BILL TO | |
|--|--|--|---------------------------------------|
| Project Manager: Cliff I | Cliff Brunson | P.O. #: | ANALYSIS REQUEST |
| Address: P.O. Box 805 | 05 | Company: | |
| City: Hobbs | State: NM Zip: 88241 | Attn: | |
| Phone #: 575-397-6388 | 38 Fax #: 575-397-0397 | Address: | |
| Project #: | Project Owner: OXY | City: OSM | |
| Project Name: Amax | x 24 Federal #9 | State: Zip: | |
| Project Location: C | 29 | # | |
| Sampler Name: | # Orneles | Fax #: | |
| FOR LAB USE ONLY | MATRIX | | |
| | RS TER R | | |
| Lab I.D. | Sample I.D. | ASE: | |
| H561421 | # CON GROUI WASTE SOIL OIL | SLUDG OTHER ACID/B. CE / CC OTHER DATE | |
| 2- | B1620 | X 6-2 | |
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| ř | | | |
| PLEASE NOTE: Liability and Damages Card | PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any dam attempt whether based in continuous total shall be liability. | Total or total shall be served to the | |
| service. In no event shall Cardinal be liable to affiliates or successopransing out of or relate. | service in no event statulic adriants to take for recorded and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after connection of the applicable in the properties of the properties of the applicable artifacts or unconsupprintent of the applicable artifacts or unconsupprintent of or related to the performance of services hereunder by Cardinal, properties with his properties of the performance of services hereunder by Cardinal, properties of the performance of services hereunder by Cardinal, properties with his properties. | and received by Cardinal within 30 days after completion of the applicable for time or | |
| Compared by | | | □ No Add'l Phone #: □ No Add'l Fax #: |
| Relinquished By: | Received By: | TEMPOR C | |

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From:

Bratcher, Mike, EMNRD

To: Cc: "Cliff Brunson"; Shelly Tucker; Patterson, Heather, EMNRD C.J. Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis

Subject:

RE: OXY Amax 24 Federal #9 - Remediation Plan

Date:

Wednesday, August 19, 2015 7:09:00 AM

RE: OXY USA * Amax 24 Fed 9 * 30-015-27411 * K-24-23s-31e * 2RP-2379 *

Date of release: 7/10/14

Cliff,

Your proposal for remediation of the above referenced release is approved. Please advise if proposed excavation depths are not achieved. Federal sites require like approval by BLM.

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.

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

Mike Bratcher NMOCD District 2 811 S. First Street Artesia, NM 88210 O: 575-748-1283 X108

C: 575-626-0857 F: 575-748-9720

From: Cliff Brunson [mailto:cbrunson@bbcinternational.com]

Sent: Monday, August 10, 2015 6:57 PM

To: Shelly Tucker; Bratcher, Mike, EMNRD; Patterson, Heather, EMNRD

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

Subject: OXY Amax 24 Federal #9 - Remediation Plan

Shelly and Mike,

On Wednesday, July 29, 2015, I was able to visit with both you about this site. I discussed the plan with Mike first, then met with Shelly later and both of you agreed to the same plan. Therefore, this e-mail is to confirm our discussion on Wednesday, July 29, 2015 concerning the remediation plan for the Oxy Amax 24 Federal #9. 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 both 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

Phone: (575) 397-6388 Fax: (575) 397-0397

E-Mail: cbrunson@bbcinternational.com

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From:

Tucker, Shelly

To:

Bratcher, Mike, EMNRD

Cc:

Cliff Brunson; Patterson, Heather, EMNRD; C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis

Subject: Date: Re: OXY Amax 24 Federal #9 - Remediation Plan Wednesday, August 19, 2015 11:31:11 AM

BLM accepts/approves your Work Plan.

The BLM approval does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Shelly J Tucker

Environmental Protection Specialist Bureau of Land Management

620 E. Greene St Carlsbad, NM 88220

575.234.5905 - Direct 575.361.0084 - Cellular

stucker@blm.gov



On Wed, Aug 19, 2015 at 7:09 AM, Bratcher, Mike, EMNRD < mike.bratcher@state.nm.us > wrote:

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Date of release: 7/10/14

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Mike Bratcher

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|-------------------------------------|------------|-----------|-------------|---------|-------|----------|
| be greatly appreciated. | | | | | - 10 | |

Thanks, Cliff

Cliff P. Brunson, CEI, CRS

President

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