

Closure Report

RECEIVED

JUL 11 2013

NMOCD ARTESIA

Site Description

Site Name:	Unreported Leak at Nagooltee Peak 5-1
Company:	Oxy Permian Ltd.
Legal Description:	U/L J, Section 5, T22S, R24E
County:	Eddy County, NM
GPS Coordinates:	N 32.41728° W 104.51649°

Release Data

Date of Release:	06/06/2012
Type of Release:	Produced Water
Source of Release:	Unknown
Volume of Release:	Unknown
Volume Recovered:	0 bbls

Remediation Specifications

Remediation Parameters:	Excavate across the entire site to a depth of 1 foot. Then, backfill the site with clean soil.
Remediation Activities:	06/04/2013 to 06/28/2013

Plan Sent to OCD:	04/03/2013	Email from Cliff Brunson to Mike Bratcher
OCD Approval of Plan:	04/09/2013	Email from Mike Bratcher to Cliff Brunson
Plan Sent to BLM:	04/09/2013	Email from Cliff Brunson to James Amos
BLM Approval of Plan:	04/12/2013	Email from James Amos to Cliff Brunson

Supporting Documentation

Initial C-141	Signed 01/22/2013
Final C-141	Signed 07/10/2013
Site Diagram	January 2013
Groundwater Plot	25'
TOPO Maps	January 2013
Lab Summary	02/07/2013
Lab Analysis	02/07/2013
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.

07/10/2013

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

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JUL 11 2013

NMOCD ARTESIA

Form C-141
Revised October 10, 2003

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

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company	Oxy Permian Ltd.	Contact	Christopher Jones
Address	1502 W. Commerce Dr., Carlsbad, NM	Telephone No.	(575) 628-4121
Facility Name	Unreported Leak at Nagooltee Peak 5-1	Facility Type	

Surface Owner	Mineral Owner	Lease No.
---------------	---------------	-----------

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
J	5	22S	24E					Eddy County, NM

Latitude N 32.41728° Longitude W 104.51649°

NATURE OF RELEASE

Type of Release	Produced water	Volume of Release	Unknown	Volume Recovered	0 bbls
Source of Release	Unknown	Date and Hour of Occurrence	Unknown	Date and Hour of Discovery	06/06/12
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?			
By Whom?	Terry Gregston of BLM	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.*

Describe Cause of Problem and Remedial Action Taken.*

An unknown problem caused an undetermined amount of produced water to leak onto the ground. No fluids were recovered. The leak was discovered by Terry Gregston of the BLM.

Describe Area Affected and Cleanup Action Taken.*

An unknown problem caused an undetermined amount of produced water to leak onto the ground. No fluids were recovered. The leak was discovered by Terry Gregston of the BLM. Remediation will be completed in accordance with a remediation plan approved by NMOCD and the BLM.

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

Signature:	<u>OIL CONSERVATION DIVISION</u>		
Printed Name: Christopher Jones	Approved by District Supervisor:		
Title: HES Specialist	Approval Date:	Expiration Date:	
E-mail Address: Christopher_Jones@oxy.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 1-22-13	Phone: (575) 628-4121		

* Attach Additional Sheets If Necessary

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Revised October 10, 2003

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Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☒ Final Report

Name of Company	Oxy Permian Ltd.	Contact	Christopher Jones
Address	1502 W. Commerce Dr., Carlsbad, NM	Telephone No.	(575) 628-4121
Facility Name	Unreported Leak at Nagooltee Peak 5-1	Facility Type	

Surface Owner	Mineral Owner	Lease No.
---------------	---------------	-----------

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
J	5	22S	24E					Eddy County, NM

Latitude N 32.41728° Longitude W 104.51649°

NATURE OF RELEASE

Type of Release	Produced water	Volume of Release	Unknown	Volume Recovered	0 bbls
Source of Release	Unknown	Date and Hour of Occurrence	Unknown	Date and Hour of Discovery	06/06/12
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?			
By Whom?	Terry Gregston of BLM	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.*

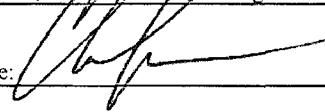
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Describe Area Affected and Cleanup Action Taken.*

An unknown problem caused an undetermined amount of produced water to leak onto the ground. No fluids were recovered. The leak was discovered by Terry Gregston of the BLM. Remediation was completed in accordance with the remediation plan approved by Mike Bratcher of NMOCD via email on 04/09/2013 and approved by James Amos of the BLM via email on 04/12/2013.

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

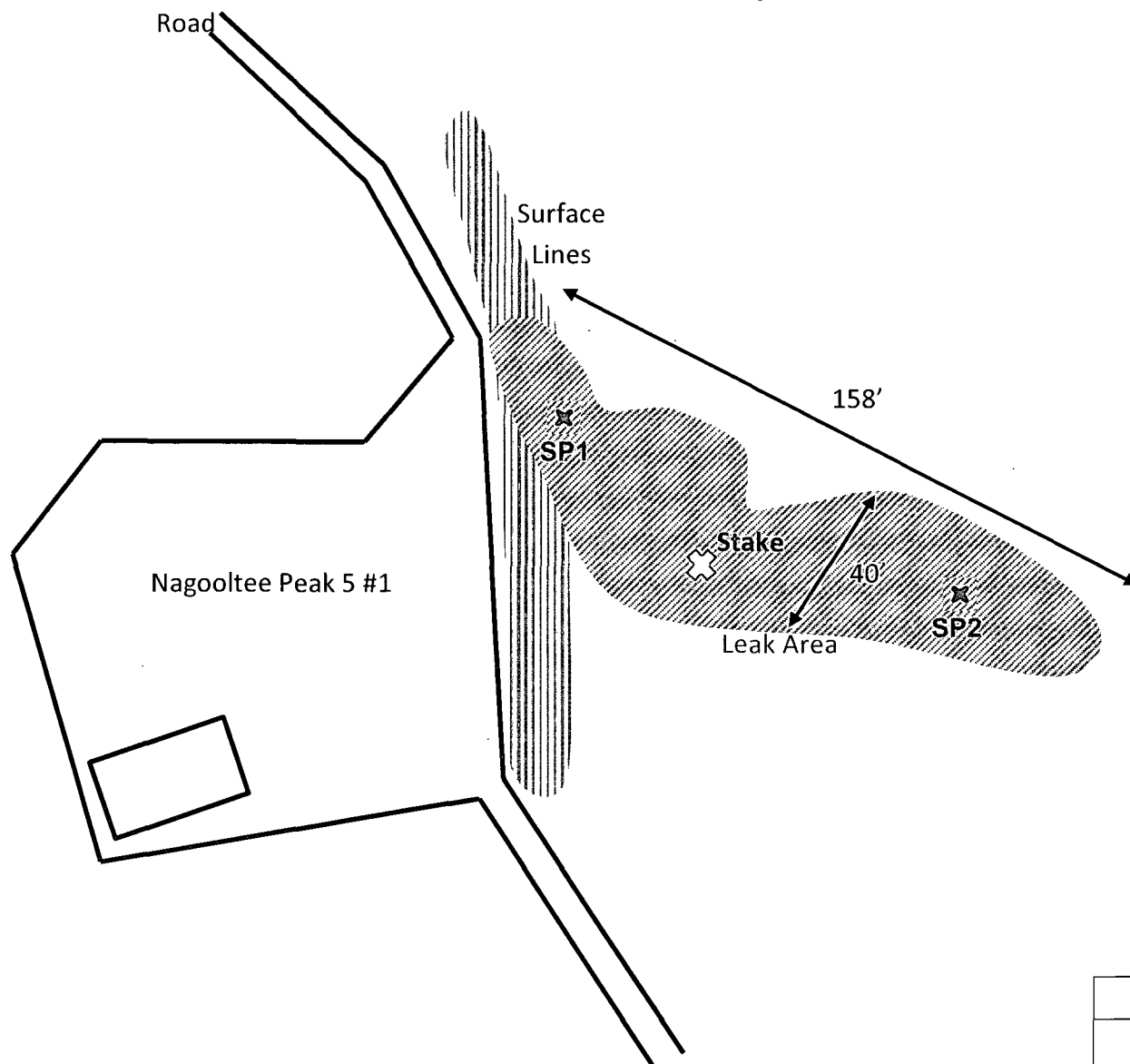
Signature: 	OIL CONSERVATION DIVISION		
Printed Name: Christopher Jones	Approved by District Supervisor:		
Title: HES Specialist	Approval Date:	Expiration Date:	
E-mail Address: Christopher.Jones@oxy.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 7-10-13	Phone: (575) 628-4121		

* Attach Additional Sheets If Necessary



Oxy

Unreported Leak (6/6/12) at Nagooltee Peak 5 #1



U/L J, Section 5, T22S, R24E

Eddy County, NM

GPS at Stake: N 32.41728° W 104.51649°

BBC International, Inc.

Oxy

Unreported Leak (6/6/12)

Date: 01/18/2013

DRWG by: K. Purvis

NOT TO SCALE

File: Oxy 2013

Groundwater Plot

Oxy Unreported Leak (6/6/12) At the Nagooltee Peak 5 Fed Com #1

County
Eddy

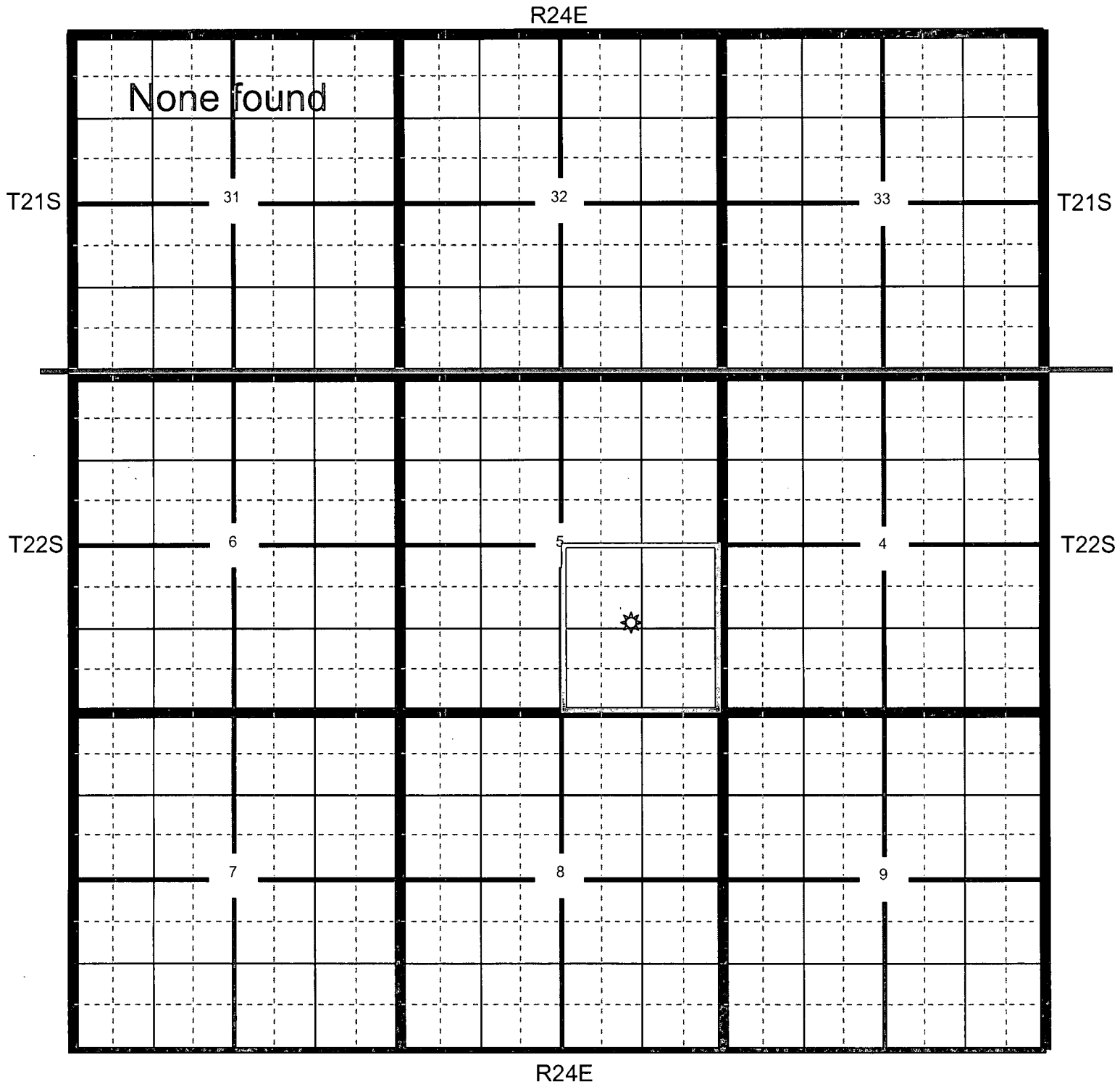
Unit Letter
SE ¼

Section
5

Township
22S

Range
24E

Trend Map <25'



Oxy Unreported Leak (6/6/12) at Nagooltee Peak 5 Fed Com #1

County Eddy Unit Letter SE ¼ Section 5 Township 22S Range 24E

Trend Map <25'

1

2

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

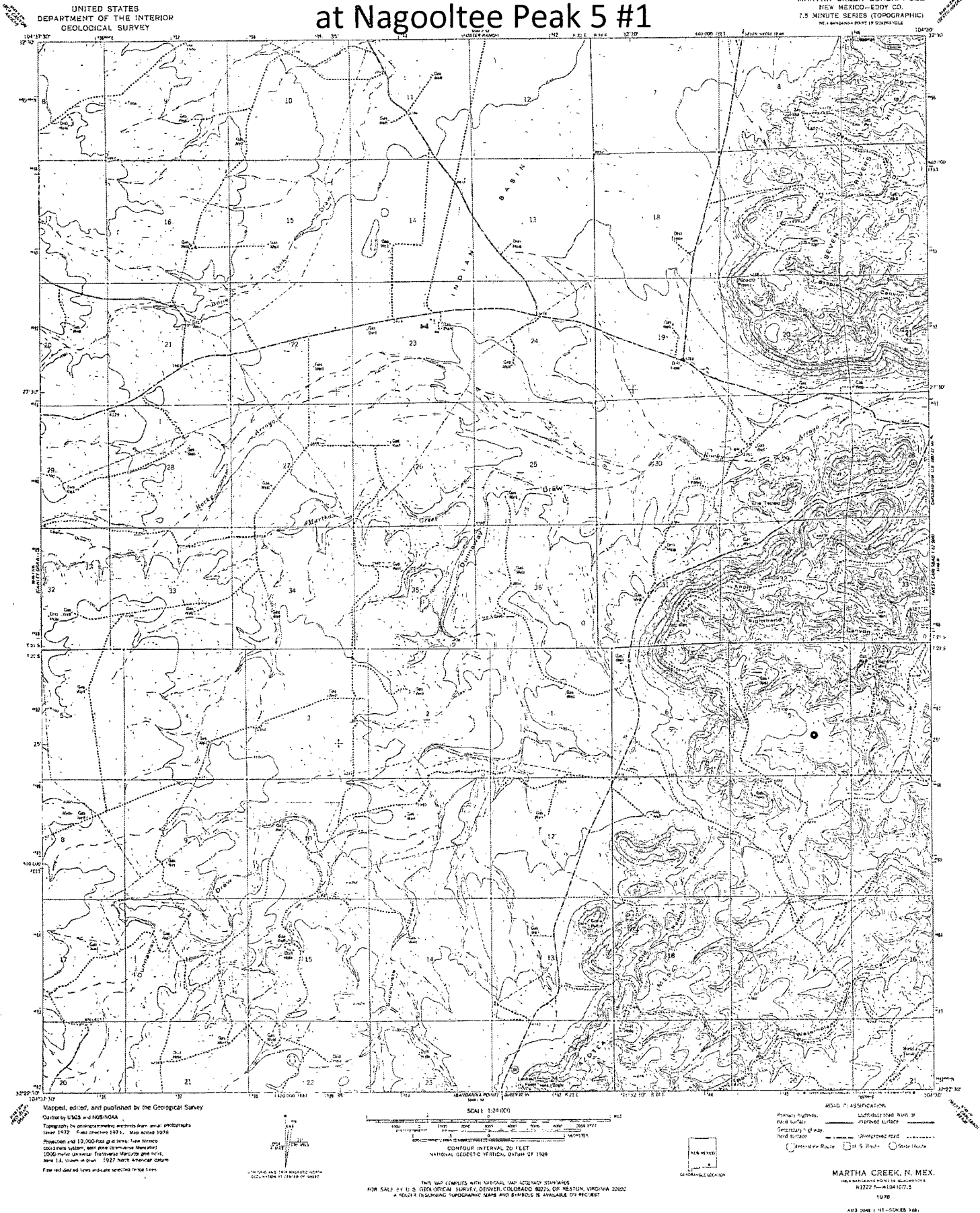
3

4

Unreported Leak 6/6/12

at Nagooltee Peak 5 #1

MARTHA CREEK QUADRANGLE
NEW MEXICO—EDDY CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)
NE. 4 QUADRANGLE



Oxy

Unreported Leak 6/6/12

at Nagooltee Peak 5 #1



**Laboratory Analytical Results Summary
Unreported Leak @ Nagooltee Peak5 #1**

		Sample	SP1 @ Surface	SP1 @ 6"
Analyte	Method	Date	2/7/13	2/7/13
			mg/Kg	mg/Kg
Benzene	BTEX 8021B		n/a	<0.050
Toluene	BTEX 8021B		n/a	<0.050
Ethylbenzene	BTEX 8021B		n/a	<0.050
Total Xylenes	BTEX 8021B		n/a	<0.150
Total BTEX	BTEX 8021B		n/a	<0.300
Chloride	SM4500Cl-B		48	704
GRO	TPH 8015M		n/a	<10.0
DRO	TPH 8015M		n/a	<10.0

		Sample	SP2 @ Surface	SP1 @ 6"
Analyte	Method	Date	2/7/13	2/7/13
			mg/Kg	mg/Kg
Benzene	BTEX 8021B		n/a	<0.050
Toluene	BTEX 8021B		n/a	<0.050
Ethylbenzene	BTEX 8021B		n/a	<0.050
Total Xylenes	BTEX 8021B		n/a	<0.150
Total BTEX	BTEX 8021B		n/a	<0.300
Chloride	SM4500Cl-B		64	816
GRO	TPH 8015M		n/a	<10.0
DRO	TPH 8015M		n/a	<10.0

February 14, 2013

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: UNREPORTED LEAK @ NAGOOLTE PEAK 5 #1

Enclosed are the results of analyses for samples received by the laboratory on 02/08/13 12:00.

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

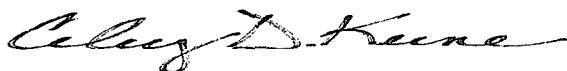
Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

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:	02/08/2013	Sampling Date:	02/07/2013
Reported:	02/14/2013	Sampling Type:	Soil
Project Name:	UNREPORTED LEAK @ NAGOOLTE PEAK	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: SP 1 @ SURFACE (H300369-01)

Chloride, SM4500CI-B		mg/kg		Analyzed By: DW					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	02/13/2013	ND	432	108	400	3.77	

Sample ID: SP 1 @ 6" (H300369-02)

BTEX 8021B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/13/2013	ND	2.46	123	2.00	8.61	
Toluene*	<0.050	0.050	02/13/2013	ND	2.42	121	2.00	9.04	
Ethylbenzene*	<0.050	0.050	02/13/2013	ND	2.39	119	2.00	8.61	
Total Xylenes*	<0.150	0.150	02/13/2013	ND	7.26	121	6.00	8.88	
Total BTEX	<0.300	0.300	02/13/2013	ND					

Surrogate: 4-Bromofluorobenzene (PIE) 107 % 89.4-126

Chloride, SM4500CI-B		mg/kg		Analyzed By: DW					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	704	16.0	02/13/2013	ND	432	108	400	3.77	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	02/11/2013	ND	197	98.5	200	12.1	
DRO >C10-C28	<10.0	10.0	02/11/2013	ND	182	90.8	200	16.2	

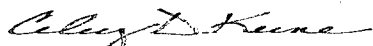
Surrogate: 1-Chlorooctane 94.6 % 65.2-140

Surrogate: 1-Chlorooctadecane 117 % 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.



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:	02/08/2013	Sampling Date:	02/07/2013
Reported:	02/14/2013	Sampling Type:	Soil
Project Name:	UNREPORTED LEAK @ NAGOOLTE PEAK	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: SP 2 @ SURFACE (H300369-03)

Chloride, SM4500CI-B		mg/kg		Analyzed By: DW						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	64.0	16.0	02/13/2013	ND	432	108	400	3.77		

Sample ID: SP 2 @ 6" (H300369-04)

BTX 8021B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	02/13/2013	ND	2.46	123	2.00	8.61		
Toluene*	<0.050	0.050	02/13/2013	ND	2.42	121	2.00	9.04		
Ethylbenzene*	<0.050	0.050	02/13/2013	ND	2.39	119	2.00	8.61		
Total Xylenes*	<0.150	0.150	02/13/2013	ND	7.26	121	6.00	8.88		
Total BTX	<0.300	0.300	02/13/2013	ND						

Surrogate: 4-Bromofluorobenzene (PID) 108 % 89.4-126

Chloride, SM4500CI-B		mg/kg		Analyzed By: DW						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	816	16.0	02/13/2013	ND	432	108	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	02/11/2013	ND	197	98.5	200	12.1		
DRO >C10-C28	<10.0	10.0	02/11/2013	ND	182	90.8	200	16.2		

Surrogate: 1-Chlorooctane 89.9 % 65.2-140

Surrogate: 1-Chlorooctadecane 107 % 63.6-154

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

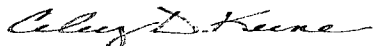
Notes and Definitions

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



101 East Marland, Hobbs, NM 88240

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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Kathy Purvis

From: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Sent: Tuesday, April 09, 2013 8:17 AM
To: Cliff P. Brunson
Cc: Chris Jones; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: RE: Oxy-Unreported Leak (6/6/12) at Nagooltee Peak 5 #1-Remediation Plan

Reference: OXY USA * Nagooltee Peak 5-1 * 30-015-24713 * J-5-22s-24e * Eddy County, New Mexico
OCD Tracking Number: 2RP-1525 * Date of release: unknown (Discovery date: 6/6/2012)

Cliff,

Your proposal for remediation of the above referenced produced fluid release is approved. Please notify OCD prior to commencement of remedial activities. BLM approval of remediation proposal may be required.

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 P. Brunson [<mailto:cbrunson@bbcinternational.com>]
Sent: Wednesday, April 03, 2013 3:39 PM
To: Bratcher, Mike, EMNRD
Cc: Chris Jones; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: Oxy-Unreported Leak (6/6/12) at Nagooltee Peak 5 #1-Remediation Plan

Mike,

This e-mail is to confirm our discussion on March 25, 2013 concerning the remediation plan for the release that occurred at the Oxy Unreported Leak (6/6/12) at Nagooltee Peak 5 #1. I have attached the site drawing and the summary of the laboratory data we reviewed during our discussion for your files. As agreed, Oxy will excavate one foot across the entire leak area at the site dependent upon ground hardness. The site will then be backfilled with clean soil. The depth to groundwater in this area is approximately 25 feet.

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

Oxy and I thank you for your assistance in handling this matter.

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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Kathy Purvis

From: Amos, James <jamos@blm.gov>
Sent: Friday, April 12, 2013 6:41 AM
To: Cliff P. Brunson
Cc: Chris Jones; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: Re: FW: Oxy-Unreported Leak (6/6/12) at Nagooltee Peak 5 #1-Remediation Plan

Cliff,

You are approved to proceed with the remediation plans as per request. Once depth has been achieved, provide notification, giving BLM an opportunity to validate.

Thanks,

J. Amos

On Tue, Apr 9, 2013 at 6:24 PM, Cliff P. Brunson <cbrunson@bbcinternational.com> wrote:
Jim,

I have attached a remediation packet of information for your review. The packet includes a site diagram, groundwater information, lab data summary table, and the original laboratory data. In addition, I have attached the approval from the NMOCD for this plan below in this e-mail. Oxy proposes the same following plan to the BLM as approved by the NMOCD.

Oxy proposes to excavate one foot across the entire leak area dependent upon ground hardness. The site will then be backfilled with clean soil. The depth to groundwater in this area is approximately 25 feet.

Oxy is therefore requesting the approval of the BLM to proceed with the submitted remediation plan. If you would please respond back via e-mail with your approval, 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

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From: Mike Bratcher <mike.bratcher@state.nm.us>

Date: Tuesday, April 9, 2013 8:17 AM

To: Cliff Brunson <cbrunson@bbcinternational.com>

Cc: Chris Jones <Christopher_Jones@oxy.com>, Ken Swinney <kswinney@bbcinternational.com>, Jennifer Gilkey <jgilkey@bbcinternational.com>, Kathy Purvis <kathy@bbcinternational.com>

Subject: RE: Oxy-Unreported Leak (6/6/12) at Nagooltee Peak 5 #1-Remediation Plan

Reference: OXY USA * Nagooltee Peak 5-1 * 30-015-24713 * J-5-22s-24e * Eddy County, New Mexico

OCD Tracking Number: 2RP-1525 * Date of release: unknown (Discovery date: 6/6/2012)

Cliff,

Your proposal for remediation of the above referenced produced fluid release is approved. Please notify OCD prior to commencement of remedial activities. BLM approval of remediation proposal may be required.

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 P. Brunson [<mailto:cbrunson@bbcinternational.com>]

Sent: Wednesday, April 03, 2013 3:39 PM

To: Bratcher, Mike, EMNRD
Cc: Chris Jones; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: Oxy-Unreported Leak (6/6/12) at Nagooltee Peak 5 #1-Remediation Plan

Mike,

This e-mail is to confirm our discussion on March 25, 2013 concerning the remediation plan for the release that occurred at the Oxy Unreported Leak (6/6/12) at Nagooltee Peak 5 #1. I have attached the site drawing and the summary of the laboratory data we reviewed during our discussion for your files. As agreed, Oxy will excavate one foot across the entire leak area at the site dependent upon ground hardness. The site will then be backfilled with clean soil. The depth to groundwater in this area is approximately 25 feet.

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

Oxy and I thank you for your assistance in handling this matter.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS

President

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