

## Bratcher, Mike, EMNRD

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**From:** Cliff P. Brunson <cbrunson@bbcinternational.com>  
**Sent:** Wednesday, April 03, 2013 3:32 PM  
**To:** Bratcher, Mike, EMNRD  
**Cc:** Chris Jones; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** Oxy-Saltwater Release (7/21/10) at Nagooltee Peak 5-1-Remediation Plan  
**Attachments:** Remediation Packet- Saltwater Release 7-21-10.pdf

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 Saltwater Release (7/21/10) 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 6 inches across the entire leak area at the site. 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](mailto:cbrunson@bbcinternational.com)

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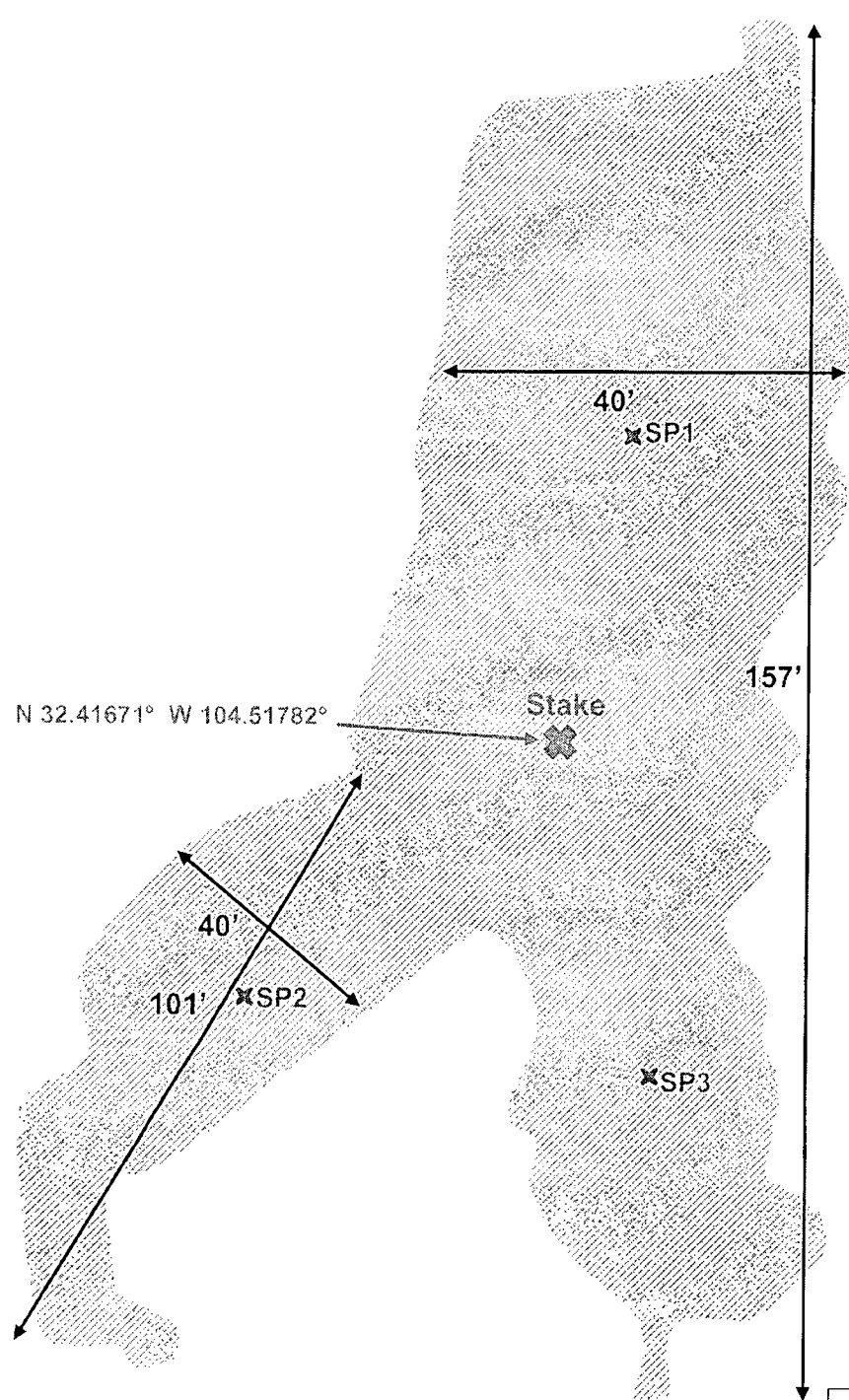
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Oxy

# Saltwater Release (7/21/10) at Nagooltee Peak 5-1



Heater Treater

Nagooltee Peak 5-1

Heater Treater

Heater Treater

U/L J, Section 5, T22S, R24E  
Eddy County, NM

BBC International, Inc.	
Oxy	
Saltwater Release 7/21/10	
Date: 01/22/2013	DRWG by: K. Purvis
NOT TO SCALE	File: Oxy 2013

# Groundwater Plot

Oxy Saltwater Release (7/21/10) At the  
Nagooltee Peak 5 Fed Com #1

County  
Eddy

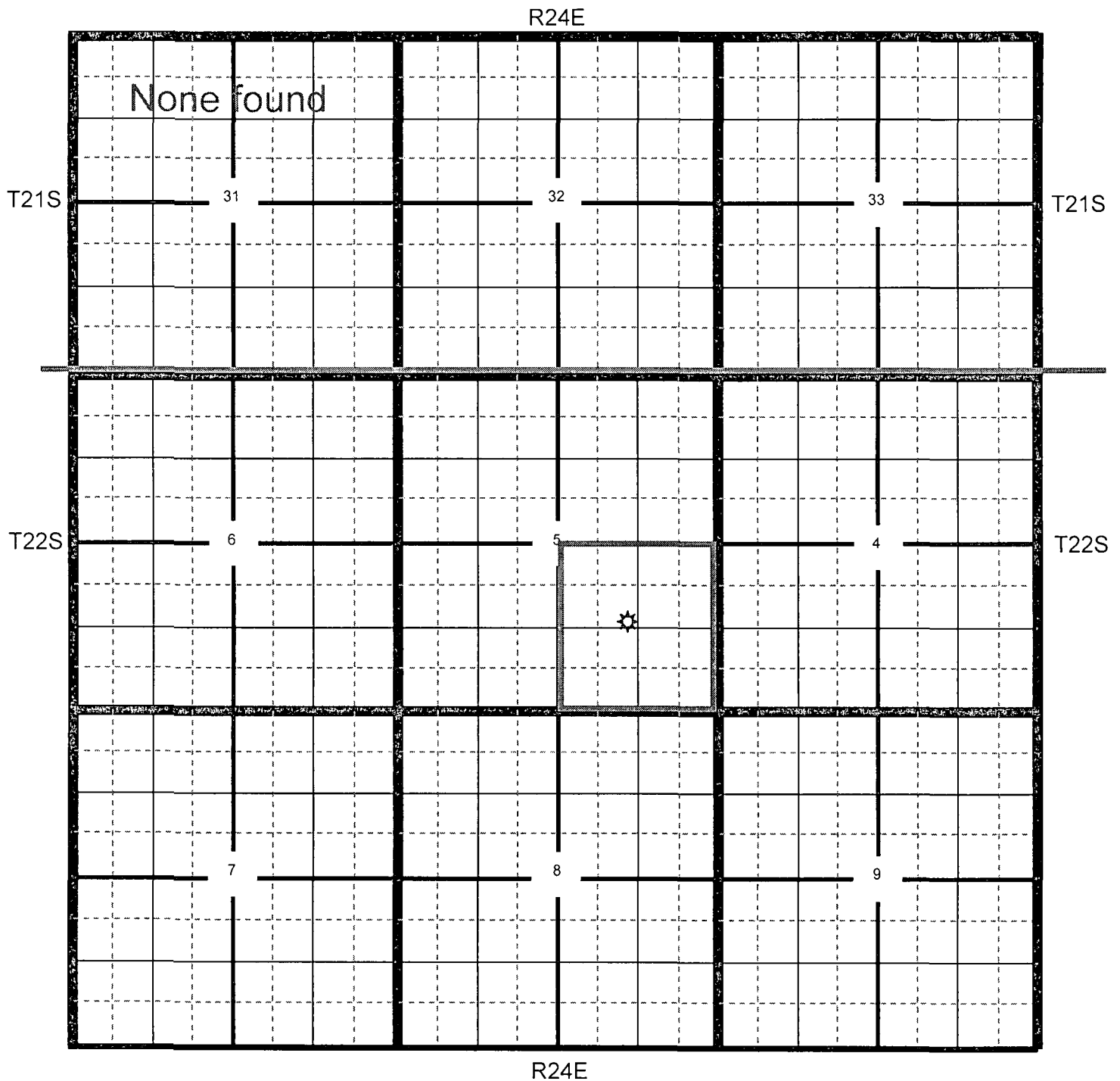
Unit Letter  
SE ¼

Section  
5

Township  
22S

Range  
24E

Trend Map <25'



★ Location

● OCD

● USGS

● SEO

● All Databases

Section Quarters

Oxy Saltwater Release (7/21/10) 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 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

**Laboratory Analytical Results Summary**  
**Saltwater Release @ Nagooltee Peak 5 #1**

		Sample	SP1 @ Surface	SP1 @ 6"
Analyte	Method	Date	2/7/13	2/7/13
			mg/Kg	mg/Kg
Chloride	SM4500Cl-B		<16.0	256

		Sample	SP2 @ Surface	SP2 @ 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		<16.0	288
GRO	TPH 8015M		n/a	<10.0
DRO	TPH 8015M		n/a	299

		Sample	SP3 @ Surface	SP3 @ 6"
Analyte	Method	Date	2/7/13	2/7/13
			mg/Kg	mg/Kg
Chloride	SM4500Cl-B		<16.0	224



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

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February 14, 2013

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: SALTWATER RELEASE @ 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](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,

A handwritten signature in black ink that reads "Coley D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager

**Analytical Results For:**

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

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

**Sample ID: SP 1 @ SURFACE (H300368-01)**

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

**Sample ID: SP 1 @ 6" (H300368-02)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: DW					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	256	16.0	02/13/2013	ND	432	108	400	3.77	

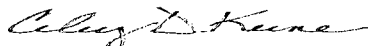
**Sample ID: SP 2 @ SURFACE (H300368-03)**

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

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Analytical Results For:**

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

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

**Sample ID: SP 2 @ 6" (H300368-04)**

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) 106 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: DW					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	288	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	299	10.0	02/11/2013	ND	182	90.8	200	16.2	

Surrogate: 1-Chlorooctane 84.8 % 65.2-140

Surrogate: 1-Chlorooctadecane 111 % 63.6-154


**Sample ID: SP 3 @ SURFACE (H300368-05)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: DW					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	02/13/2013	ND	432	108	400	3.77	

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



**Analytical Results For:**

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

Received:	02/08/2013	Sampling Date:	02/07/2013
Reported:	02/14/2013	Sampling Type:	Soil
Project Name:	SALTWATER RELEASE @ NAGOOŁTE PE/	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		


**Sample ID: SP 3 @ 6" (H300368-06)**

Chloride, SM4500Cl-B	mg/kg	Analyzed By: DW							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	224	16.0	02/13/2013	ND	432	108	400	3.77	

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Celey D. Keene, Lab Director/Quality Manager

### Notes and Definitions

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

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Celey D. Keene, Lab Director/Quality Manager



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

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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Relinquished By: <u>[Signature]</u> Date: <u>2/6/13</u> Time: _____		Received By: <u>[Signature]</u> Date: _____ Time: _____		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #: _____ Add'l Fax #: _____ REMARKS: _____	
Relinquished By: <u>[Signature]</u> Date: <u>2/5/13</u> Time: <u>17:00</u>		Received By: <u>[Signature]</u> Date: _____ Time: _____			
Delivered By: (Circle One) Sampler - UPS - Bus - Other: _____		Sample Condition Cool Intact <input type="checkbox"/> Yes <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> No		CHECKED BY: (Initials) <u>[Signature]</u>	

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

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

State of New Mexico  
Energy Minerals and Natural Resources

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

Form C-141  
Revised October 10, 2003

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

**Release Notification and Corrective Action**

**OPERATOR**

☒ Initial Report ☐ Final Report

Name of Company	Oxy Permian Ltd.	Contact	Christopher Jones
Address	1502 W. Commerce Dr., Carlsbad, NM	Telephone No.	(575) 628-4121
Facility Name	Saltwater Release at Nagoohie 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 32.41671° Longitude W 104.51782°

**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	7/21/2010
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.\*

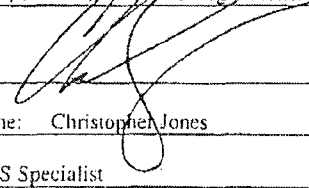
Describe Cause of Problem and Remedial Action Taken.\*

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: 		<b>OIL CONSERVATION DIVISION</b>	
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