Closure Report

RECEIVED	_
ΔPR 9 0 2012	

	Site Description	NMOCD ARTESIA
Site Name:	Big Walt CTB	71101
Company:	Oxy Permian Ltd.	
Legal Description:	U/L H, Section 2, T22S, R24E	
County:	Eddy County, NM	
GPS Coordinates:	N 32.42289° W 104.46129°	

	Release Data					
Date of Release:	Date of Release: 11/12/2012					
Type of Release:	Oil and Produced water					
Source of Release:	Failure in fire tube on west heater treater					
Volume of Release:	4 bbls oil and 10 bbls produced water					
Volume Recovered:	0 bbls					

	Remediation Specifications						
Remediation Parameters:	Excavate 2' across the entire impacted area. Backfill the excavation site with clean soil. Re-build berm areas as needed and re-seed the site with the appropriate BLM seed mixture.						
Remediation Activities:	03/21/2013 to 04/17/2013						

Plan Sent to OCD:	12/17/2012	Email from Cliff Brunson to Mike Bratcher
OCD Approval of Plan:	01/15/2013	Email from Mike Bratcher to Cliff Brunson
Plan Sent to BLM:	01/23/2013	Email from Cliff Brunson to Terry Gregston
BLM Approval of Plan:	01/30/2013	Email from Terry Gregston to Cliff Brunson

	Supporting Documentation					
Initial C-141	Signed 11/26/2012					
Final C-141	Signed 04/25/2013					
Site Diagram	November 2012					
Groundwater Plot	50'-100'					
TOPO Maps	November 2012					
Lab Summary	11/28/2012					
Lab Analysis	11/28/2012					
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.

04/25/2013

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

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			l Report		Final Report
Name of Co		Oxy Permia			(Contact Christopher Jones						
		ommerce Dr	., Carlsba	ıd, NM	Γ	elephone N		4121				
Facility Nan	ne Big V	Valt CTB			<u> </u>	acility Typ	e Gathering					
Surface Owi	ner			Mineral Ov	wner				Lease No.			
				LOCA	TION	OF REI	EASÈ					
Unit Letter	Section	Township	Range			South Line	Feet from the	East/V	Vest Line	County		
Н	2	22S	24E							Eddy Cou	ntv. NN	И
			I		289°	Longitu	de W 104.4612	9°				<u></u>
				NATI	URE (OF RELI	EASE					
Type of Relea	ise Oil ar	nd Produced v	vater			Volume of			Volume R	Recovered	0 bbls	
	Source of Release Failure in fire tube on west heater treater						water and 4 bbls o			() (27)		
Source of Rel	ease Fail	lure in fire tub	e on west	heater treater		Date and H	our of Occurrenc	e	Date and 11/12/201	Hour of Dis	covery	
Was Immedia	Was Immediate Notice Given?					If YES, To		······································				
		\boxtimes	Yes _	No Not Rec	quired	Mike Brate	her-NMOCD and	! Terry (Gregston-B	LM		
By Whom?	Christophe	r Jones					lour 11/14/2012					
Was a Watero	Was a Watercourse Reached?					If YES, Vo	lume Impacting t	he Wate	ercourse.			
	☐ Yes ☒ No								R	ECEL	VE	
If a Watercou	irse was Im	pacted, Descr	ibe Fully.	•					1	APR 2 9 OCD A F		SIA
Describe Cau The failure of The tube was	f a fire tube	on the west h	ieater trea	ter caused 10 bbls	of prodi	uced water a	nd 4 bbls of oil to	leak ins				
Describe Are The area affe plans.				ken.* Remediation will	be perfo	ormed in acco	ordance with NM	OCD-ap	proved and	l BLM-appr	oved re	emediation
regulations al public health should their o	or the envi or the envi operations h	are required to ronment. The lave failed to addition, NMC	o report an acceptant adequately	e is true and completed of file certain record of a C-141 reported to and record of a C-141 record of	lease no rt by the mediate	otifications as NMOCD me contamination	nd perform correct arked as "Final R on that pose a thr	ctive act eport" of eat to g	ions for rel loes not rel round wate	eases which ieve the ope r, surface w	may er erator of ater, hu	ndanger f liability ıman health
							OIL CON	SERV	ATION	DIVISIO	NC	
Signature:	/]									
Printed Name	: Christo	opher Jones				Approved by	District Supervis	or:				
Title: HES	Specialist	Ų				Approval Da	te:		Expiration	Date:		
E-mail Addre	ess: Chris	stopher_Jones	@оху.сог	n	,	Conditions o	f Approval:			Attached	1 🗆	
Date: 11-	26-1	2 otc If Nacacc	Phone	: (575) 628-412	1							

Attach Additional Sheets If Necessary

District 1 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

Revised October 10, 2003

Form C-141

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

Attached [

Release Notification and Corrective Action **OPERATOR** Initial Report Final Report Contact Christopher Jones Telephone No. (575) 628-4121 Facility Type Gathering

Name of Company Oxy Permian Ltd Address 1502 W. Commerce Dr., Carlsbad, NM Facility Name Big Walt CTB 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 ы **22S** 24E Eddy County, NM Latitude N 32,42289° Longitude W 104.46129° NATURE OF RELEASE Type of Release Oil and Produced water Volume of Release Volume Recovered 0 bbls 10 bbls of water and 4 bbls of oil Source of Release Failure in fire tube on west heater treater Date and Hour of Occurrence Date and Hour of Discovery 11/12/2012 11/12/2012 Was Immediate Notice Given? If YES, To Whom? Mike Bratcher-NMOCD and Terry Gregston-BLM By Whom? Christopher Jones Date and Hour 11/14/2012 @ 8:50 am Was a Watercourse Reached? If YES, Volume Impacting the Watercourse RECEIVED ☐ Yes ☒ No If a Watercourse was Impacted, Describe Fully.* APR 2 9 2013 **NMOCD ARTESIA** Describe Cause of Problem and Remedial Action Taken.* The failure of a fire tube on the west heater treater caused 10 bbls of produced water and 4 bbls of oil to leak inside the firewall. 0 bbls were recovered. The tube was repaired to prevent further leaking. Describe Area Affected and Cleanup Action Taken.* The area affected was approximately 35' x 45'. Remediation was completed in accordance with the remediation plan approved by Mike Bratcher of NMOCD via email on 01/15/2013 and approved by Terry Gregston of BLM via email on 01/30/2013. 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 accordance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and regulators. OIL CONSERVATION DIVISION Signature: Approved by District Supervisor: Printed Name: Chris Jony HES Specialist Approval Date: **Expiration Date:** E-mail Address: Christopher Jones@oxy.com Conditions of Approval:

Phone:

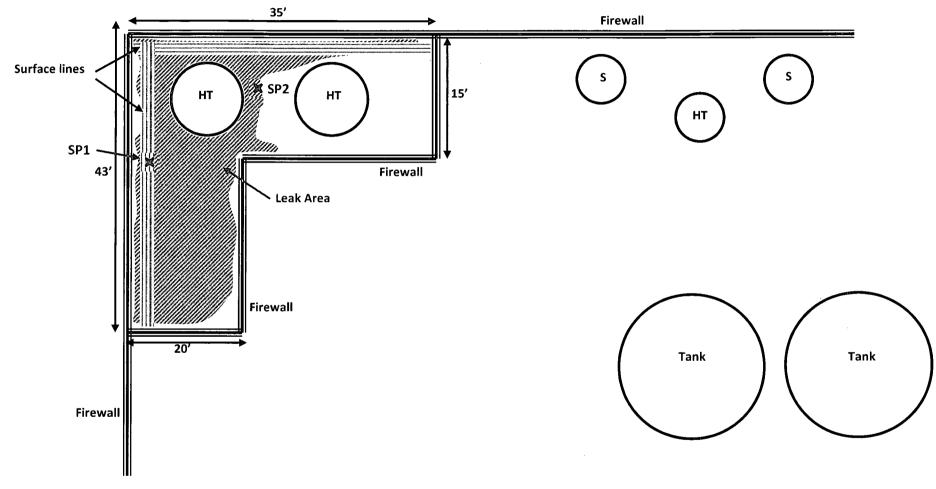
(575) 628-4121

^{*} Attach Additional Sheets If Necessary



Оху

Big Walt CTB



U/L H, Section 2, T22S, R24E Eddy County, NM N 32.42289° W 104.46129°

BBC International, Inc.

Oxy Big Walt CTB

Date: 11/19/12	DRWG by: K. Purvis
NOT TO SCALE	File: Oxy 2012



Groundwater Plot

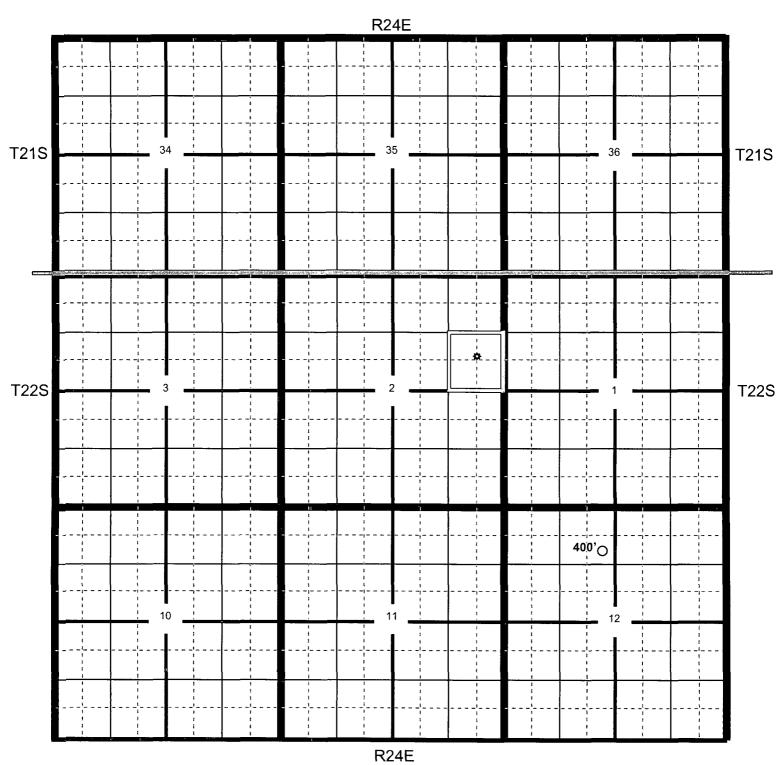
Oxy Big Walt CTB

County Eddy Unit Letter H Section

Township 22S Range 24E

Trend Map

50'-100'



⇔ Location

OCD

○USGS

○SEO

All Databases



Section Quarters

Oxy Big Walt CTB

County Eddy

Unit Letter

Section

Township **22S**

Range 24E

Trend Map 50'-100'

1

NW/NW	NE/NW	NW/NE	NE/NE
None			
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

♣ Location

 \circ OCD

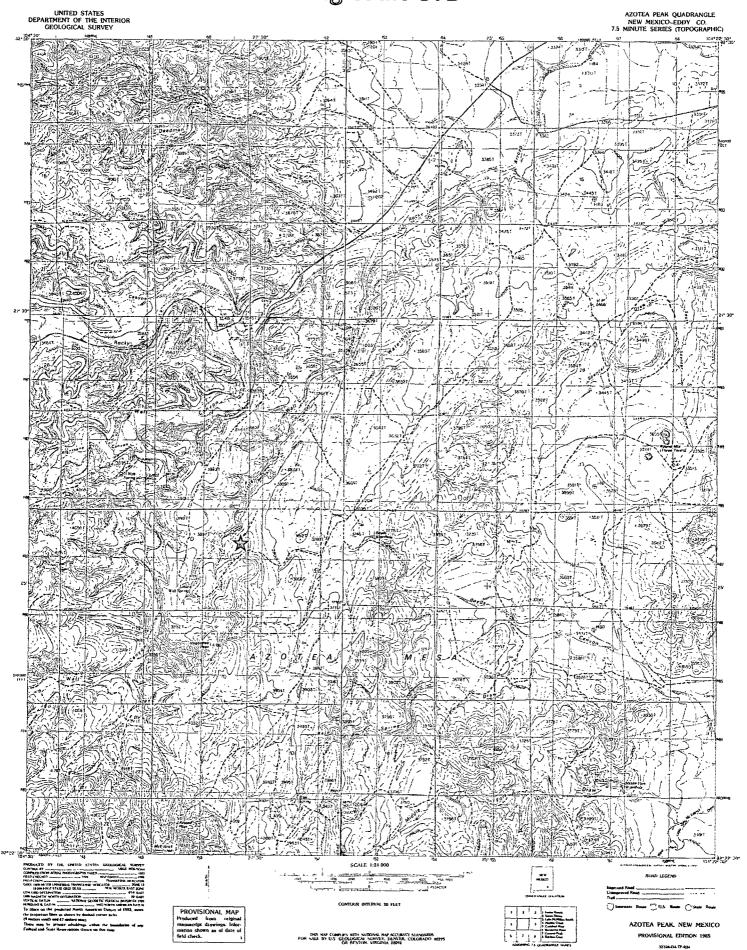
OUSGS

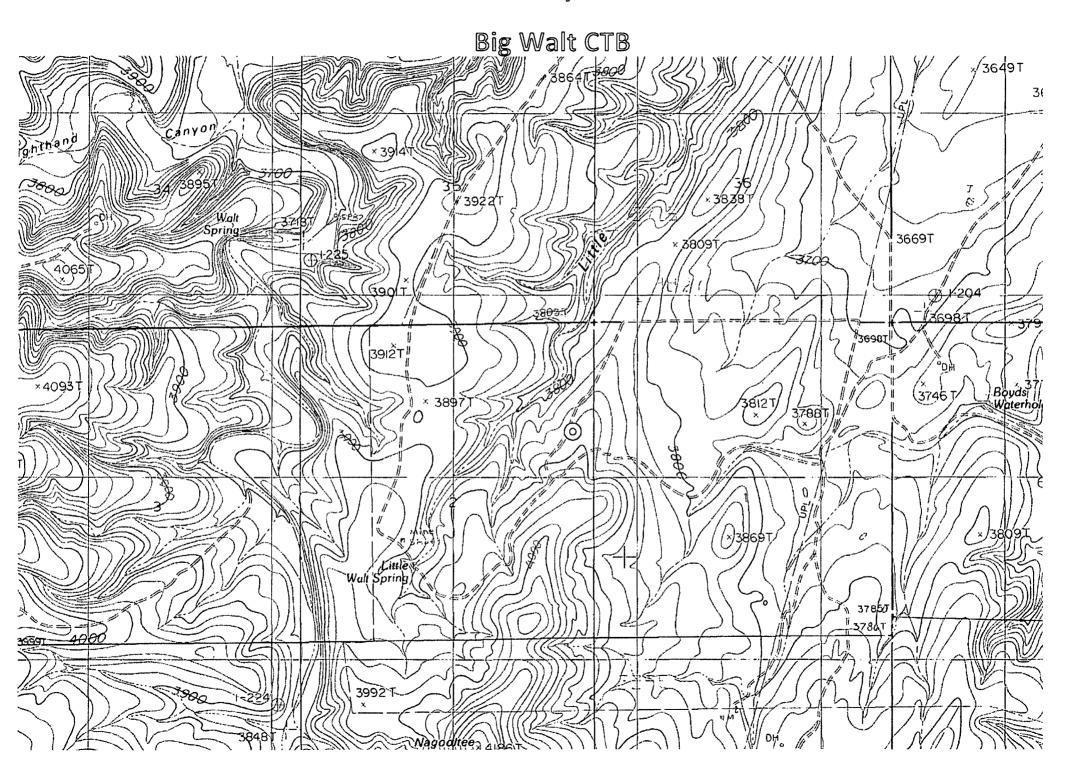
o seo

All Databases

Oxy

Big Walt CTB





Laboratory Analytical Results Summary Big Walt CTB

		Sample	SP1 @ 6"	SP1 @ 1'	SP1 @ 2'
Analyte	Method	Date	11/28/12	11/28/12	11/28/12
			mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.050	<0.200	<0.050
Toluene	BTEX 8021B		9.48	1.1	0.132
Ethylbenzene	BTEX 8021B		4.89	1.59	0.12
Total Xylenes	BTEX 8021B		40.5	10.9	0.74
Total BTEX	BTEX 8021B		54.9	13.6	0.992
Chloride	SM4500CI-B		112	96	64
GRO	TPH 8015M		1400	389	10.2
DRO	TPH 8015M		8520	5470	277

		Sample	SP2 @ 6"	SP2 @ 1'	SP2 @ 2'	SP2 @ 3'
Analyte	Method	Date	11/28/12	11/28/12	11/28/12	11/28/12
			mg/Kg	mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		2.61	0.598	<0.050	<0.050
Toluene	BTEX 8021B		27.9	5.94	0.09	<0.050
Ethylbenzene	BTEX 8021B		9.49	3.4	0.063	0.114
Total Xylenes	BTEX 8021B		104	34.3	0.394	0.179
Total BTEX	BTEX 8021B		144	44.2	0.547	< 0.300
Chloride	SM4500CI-B		112	96	48	64
GRO	TPH 8015M		3440	1080	11.7	<10.0
DRO	TPH 8015M	ĺ	14400	6750	277	167



December 04, 2012

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: BIG WALT CTB

Enclosed are the results of analyses for samples received by the laboratory on 11/28/12 16:55.

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 accredited 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. Keene

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:

(505) 397-0397

Received:

11/28/2012

Sampling Date:

11/28/2012

Reported:

12/04/2012

Sampling Type:

Soil

Project Name:

BIG WALT CTB

Sampling Condition:

Cool & Intact

Project Number:

NONE GIVEN

Sample Received By:

Jodi Henson

Project Location:

EDDY COUNTY, NM

Sample ID: SP 1 @ 6" (H202870-01)

BTEX 8021B	mg/	kg	Analyze	d By: AP					S-06
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.500	0.500	11/30/2012	ND	1.86	93.2	2.00	20.5	
Toluene*	9.48	0.500	11/30/2012	ND	1.99	99.5	2.00	20.6	
Ethylbenzene*	4.89	0.500	11/30/2012	ND	1.93	96.6	2.00	20.8	
Total Xylenes*	40.5	1.50	11/30/2012	ND	5.94	99.0	6.00	20.3	
Total BTEX	54.9	3.00	11/30/2012	ND					
Surrogate: 4-Bromofluorobenzene (PIL	190	% 89.4-12	6						
Chloride, SM4500CI-B	mg,	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	11/30/2012	ND	400	100	400	0.00	
TPH 8015M	mg,	/kg	Analyze	d By: MS					S-06
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	1400	50.0	11/29/2012	ND	193	96.4	200	1.70	
DRO >C10-C28	8520	50.0	11/29/2012	ND	208	104	200	1.70	
Surrogate: 1-Chlorooctane	178 :	% 65.2-14	0						
Surrogate: 1-Chlorooctadecane	249	% 63.6-15	4						

Cardinal Laboratories *=Accredited Analyte

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Celey D. Keine



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

Fax To: (505) 397-0397

Received:

11/28/2012

Sampling Date:

11/28/2012

Reported:

12/04/2012

Sampling Type:

Soil

Project Name:

BIG WALT CTB

Sampling Condition:

Cool & Intact

Project Number:

NONE GIVEN

Sample Received By:

Jodi Henson

Project Location:

EDDY COUNTY, NM

Sample ID: SP 1 @ 1' (H202870-02)

BTEX 8021B	mg/	kg	Analyze	d By: AP		_			S-06
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.200	0.200	11/30/2012	ND	1.86 1.99	93.2	2.00	20.5	
Toluene*	1.10	0.200	11/30/2012	ND		99.5	2.00	20.6	
Ethylbenzene*	1.59 0,200		11/30/2012	ND	1.93	96.6	2.00	20.8	
Total Xylenes*	10.9 0,600		11/30/2012	ND	5.94	99.0	6.00	20.3	
Total BTEX	13.6	1.20	11/30/2012	ND					
Surrogate: 4-Bromofluorobenzene (PIL	239	% 89.4-12	6						
Chloride, SM4500CI-B	mg/	'kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	11/30/2012	ND	400	100	400	0.00	
TPH 8015M	mg/	kg	Analyze	d By: MS			<u> </u>		
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	389	50.0	11/29/2012	ND	193	96.4	200	1.70	
DRO >C10-C28	5470	50.0	11/29/2012	ND	208	104	200	1.70	
Surrogate: 1-Chlorooctane	125 9	% 65.2-14	0						
Surrogate: 1-Chlorooctadecane		63.6-15	4						

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*=Accredited Analyte

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Celey D. Keene



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

Fax To: (505) 397-0397

Received:

11/28/2012

Sampling Date:

11/28/2012

Reported:

12/04/2012

Sampling Type:

Soil

Project Name:

BIG WALT CTB NONE GIVEN

Sampling Condition: Sample Received By: Cool & Intact Jodi Henson

Project Number: Project Location:

EDDY COUNTY, NM

Sample ID: SP 1 @ 2' (H202870-03)

BTEX 8021B	mg/	kg	Analyze	d By: AP					S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	11/30/2012	ND	1.86	93.2	2.00	20.5		
Toluene*	0.132	0.050	11/30/2012	ND	1.99	99.5	2.00	20.6		
Ethylbenzene*	0.120	0.050	11/30/2012	ND	1.93	96.6	2.00	20.8		
Total Xylenes*	0.740	0.150	11/30/2012	ND	5.94	99.0	6.00	20.3		
Total BTEX	0.992	0.300	11/30/2012	ND						
Surrogate: 4-Bromofluorobenzene (PIL	169 5	% 89.4-12	6			-				
Chloride, SM4500CI-B	mg/	kg	Analyze	d By: AP						
Analyte	Result	Reporting Limit	Analyzed Method Blan		BS	% Recovery True Value C		RPD	Qualifier	
Chloride	64.0	16.0	11/30/2012	ND	400	100	400	0.00		
TPH 8015M	mg/	kg	Analyze	d By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	10.2	10.0	11/29/2012	ND	193	96.4	200	1.70		
DRO >C10-C28	277	10.0	11/29/2012	ND	208	104	200	1.70		
Surrogate: 1-Chlorooctane	86.7	% 65.2-14	0						- · · · · · · · · · · · · · · · · · · ·	
Surrogate: 1-Chlorooctadecane	100 % 63.6-15		4							

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*=Accredited Analyte

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Celen & Keene



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

Fax To: (505) 397-0397

Received:

11/28/2012

Reported: Project Name: 12/04/2012 BIG WALT CTB

Project Number:

NONE GIVEN

Project Location:

EDDY COUNTY, NM

Sampling Date:

11/28/2012

Sampling Type:

Soil

Sampling Condition:

Cool & Intact

Sample Received By:

Jodi Henson

Sample ID: SP 2 @ 6" (H202870-04)

BTEX 8021B	mg/	kg	Analyze	d By: AP					S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	2.61		11/30/2012	ND	1.86	93.2	2.00	20.5		
Toluene*	27.9 1.00		11/30/2012	ND	1.99	99.5	2.00	20.6		
Ethylbenzene*	9.49 1.00		11/30/2012	ND	1.93	96.6	2.00	20.8		
Total Xylenes*	104 3.00		11/30/2012	ND	5.94	99.0	6.00	20.3		
Total BTEX	144	144 6.00		ND						
Surrogate: 4-Bromofluorobenzene (PIC	172 5	172 % 89.4-126								
Chloride, SM4500Cl-B	mg/	kg	Analyze	d By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	112	16.0	11/30/2012	ND	400	100	400	0.00		
TPH 8015M	mg/	kg	Analyze	d By: MS					S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	3440	50.0	11/29/2012	ND	193	96.4	200	1.70		
DRO >C10-C28	14400	50.0	11/29/2012	ND	208	104	200	1.70		
Surrogate: 1-Chlorooctane	207 5	% 65.2-14	0						•	
Surrogate: 1-Chlorooctadecane	334 9	% 63.6-15	4							

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keine



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

Fax To:

(505) 397-0397

Received:

11/28/2012

Sampling Date:

11/28/2012

Reported:

12/04/2012

Sampling Type:

Soil

Project Name:

BIG WALT CTB

Sampling Condition:

Cool & Intact

Project Number: Project Location:

NONE GIVEN EDDY COUNTY, NM Sample Received By:

Jodi Henson

Sample ID: SP 2 @ 1' (H202870-05)

BTEX 8021B	mg,	kg	Analyze	d By: AP		-			S-06	
Analyte	Result	Reporting Limit	Analyzed	alyzed Method Blank		% Recovery	True Value QC	RPD	Qualifier	
Benzene*	0.598	0.200	11/30/2012	ND	1.86	93.2	2.00	20.5		
Toluene*	5.94	0.200	11/30/2012	ND	1.99	99.5	2.00	20.6		
Ethylbenzene*	* 3.40		11/30/2012	ND	1.93	96.6	2.00	20.8		
Total Xylenes*	34.3 0.600		11/30/2012	12 ND		99.0	6.00	20.3		
Total BTEX	44.2	1.20	11/30/2012	ND						
Surrogate: 4-Bromofluorobenzene (PIE 2		% 89.4-12	6					4,000		
Chloride, SM4500CI-B	mg	/kg	Analyze	d By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	96.0	, 16.0	11/30/2012	ND	400	100	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	1080	50.0	11/29/2012	ND	193	96.4	200	1.70		
DRO >C10-C28	>C10-C28 6750 50.0		11/29/2012	ND	208	104	200	1.70		
Surrogate: 1-Chlorooctane	Chlorooctane 168 % 65.2-1-		0							
Surrogate: 1-Chlorooctadecane	214	% 63.6-15	4							

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Celey D. Keene



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

Fax To: (505) 397-0397

Received:

11/28/2012

Sampling Date:

11/28/2012

Reported:

12/04/2012

Sampling Type:

Soil

Project Name:

BIG WALT CTB

Sampling Condition:

Cool & Intact

Project Number:

NONE GIVEN

Sample Received By:

Jodi Henson

Project Location:

EDDY COUNTY, NM

Sample ID: SP 2 @ 2' (H202870-06)

BTEX 8021B	mg/	kg	Analyze	d By: AP					S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	11/30/2012	ND	1.86	93.2	2.00	20.5		
Toluene*	0.090	0.050	11/30/2012	ND	1.99	99.5	2.00	20.6		
Ethylbenzene*	0.063	0.050	11/30/2012	ND	1.93	96.6	2.00	20.8		
Total Xylenes*	0.394	0.150	11/30/2012	ND	5.94	99.0	6.00	20.3		
Total BTEX	0.547	0.300	11/30/2012	ND					•	
Surrogate: 4-Bromofluorobenzene (PIL	145 9	% 89.4-12	6				·			
Chloride, SM4500CI-B	mg/	kg	Analyze	d By: AP						
Analyte	Result	Result Reporting Limit		Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	11/30/2012	ND	400	100	400	0.00		
TPH 8015M	mg/	kg	Anaiyze	d By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	11.7	10.0	11/29/2012	ND	193	96.4	200	1.70		
DRO >C10-C28	277	10.0	11/29/2012	ND	208	104	200	1.70		
Surrogate: 1-Chlorooctane	84.2	% 65.2-14	0							
Surrogate: 1-Chlorooctadecane	95.8	% 63.6-15	4							

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Celey D. Keine



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

Fax To:

(505) 397-0397

Received:

11/28/2012

Sampling Date:

11/28/2012

Reported:

12/04/2012

Sampling Type:

Soil

Project Name:

BIG WALT CTB

Sampling Condition:

Cool & Intact

Project Number: Project Location:

NONE GIVEN EDDY COUNTY, NM

Sample Received By:

Jodi Henson

Sample ID: SP 2 @ 3' (H202870-07)

BTEX 8021B	mg/	kg	Analyze	d By: MS					S-04
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/03/2012	ND	1.70	85.0	2.00	1.22	
Toluene*	<0.050	0.050	12/03/2012	ND	1.91	95.3	2.00	2.78	
Ethylbenzene*	benzene* 0.114 0.050		12/03/2012	ND	1.87	93.3	2.00	3.28	
Total Xylenes*	enes* 0.179 0.150		12/03/2012	ND	5.70	95.0	6.00	3.24	
Total BTEX	<0.300	0.300	12/03/2012	ND					
Surrogate: 4-Bromofluorobenzene (PIL	136	% 89.4-12	6						
Chloride, SM4500CI-B	mg/	kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	11/30/2012 ND		400	100	400	0.00	
TPH 8015M	mg/	kg	Analyze	Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	11/29/2012	ND	193	96.4	200	1.70	
DRO >C10-C28	167	10.0	11/29/2012	ND	208	104	200	1.70	
Surrogate: 1-Chlorooctane	rogate: 1-Chlorooctane 88.3 % 65.2-14		0		-				
Surrogate: 1-Chlorooctadecane	99.0	% 63.6-15	4						

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Celey & Keene



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.
S-04	The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
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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Celeg & Keene

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

RDINAL LABORATORIES 101 East Marland, Hobbs, NM 88240

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

Company Name	ompany Name: BBC International, Inc.						BILLTO							ANALYSIS REQUEST										
Project Manage	r: Cliff Brunson							P.0). #:															
Address: P.O.	Box 805							Co	mpa	ny:											İ		1	
city: Hobbs		State: NM	Zip	: 88	241			Att	n:													l	ŀ	
Phone #: 575-	397-6388	Fax #: 575	397	7-039	97			Address:														l		
Project #: Project Owner: Oxy						City:												İ	- [
Project Name: Big Walt CTB						State: Zip:														. 1				
Project Location: Eddy County, NM						Phone #:										!		İ						
Sampler Name:	Gary Ray							Fa	x #:		-													
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† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-24/6

Kathy Purvis

From:

Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>

Sent:

Tuesday, January 15, 2013 9:01 AM

To:

Cliff P. Brunson

Cc:

Chris Jones; Ken Swinney; Jennifer Gilkey; Kathy Purvis

Subject:

RE: Oxy Big Walt Central Tank Battery

Reference: OXY USA * Big Walt CTB (Big Walt 2 St 8) * 30-015-33315 * H-2-22s-24e * Eddy County, New Mexico NMOCD Reference Number: 2RP-1425 * Date of release: 11/12/12

Cliff,

Your proposal for remediation of the above referenced release is approved. The site is situated on Federal surface and may require like approval from 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, 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: Monday, December 17, 2012 6:49 PM

To: Bratcher, Mike, EMNRD

Cc: Chris Jones; Ken Swinney; Jennifer Gilkey; Kathy Purvis

Subject: Oxy Big Walt Central Tank Battery

Mike,

This e-mail is to confirm our discussion on December 17, 2012 concerning the remediation plan for the release that occurred at the Oxy Big Walt Central Tank Battery. 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 2 feet across the entire impacted portion of the site as depicted on the attached site diagram. The excavation will then be backfilled with clean soil. The depth to groundwater is this area is approximately 75-100 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:

Cliff P. Brunson <cbrunson@bbcinternational.com>

Sent:

Wednesday, January 30, 2013 4:03 PM

To:

Kathy Purvis

Subject:

FW: Undesirable Event: NU13027TG, Big Walt Central Tank Battery: cleanup plan

approval stips

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

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From: Terry Gregston < tgregsto@blm.gov > Date: Wednesday, January 30, 2013 3:56 PM

To: James Amos <<u>jamos@blm.gov</u>>, Chris Jones <<u>Christopher Jones@oxy.com</u>>, Ken Swinney <<u>kswinney@bbcinternational.com</u>>, Mike Bratcher <<u>mike.bratcher@state.nm.us</u>>, Cliff Brunson

<cbrunson@bbcinternational.com>

Subject: Undesirable Event: NU13027TG, Big Walt Central Tank Battery: cleanup plan approval stips

Gentlemen,

This notification is in regard to the following location and undesirable event:

Event Number: NU13027TG Event Date: 11/12/2012

Event Name: Big Walt Central Tank Battery

Legals: T22S/R24E, sec. 2, SENE

The submitted cleanup plan for the above location is approved with the following conditions of approval:

Notification Stipulations:

- 1. A copy of the cleanup plan and conditions of approval must be given to the contractor or site work personnel and be present on the location during all cleanup operations.
- 2. The authorized officer must be notified at the following phases of cleanup or conditions:
 - a. Prior to moving equipment on location for cleanup

- b. When the excavation is nearing completion and a BLM inspection of the excavation or witnessing of sampling is required by the cleanup plan COA's.
- c. When the cleanup work is nearing completion and to schedule a final onsite prior to removal of equipment.
- d. Three days before the site is seeded.
- e. Any time that a variance of the approved plan or conditions of approval is required.
- 3. The authorized officer on this undesirable event case is:

Terry Gregston (575) 361-2635 tgregsto@blm.gov

Facility Cleanup Stipulations:

Unlined facility:

- 1. The BLM requires horizontal cleanup of the spill impacted areas in addition to vertical cleanup/mitigation measures. In this case, the location is still a working tank battery location. As such, excavation depths in portions of the spill area in close proximity to standing production equipment may be limited due to safety concerns. In such cases, the cleanup measures will be considered a temporary spill abatement measure that will be further mitigated upon the abandonment of the well/facility location. Appropriate notations to that effect will be entered in the well file.
- 2. Cleanup will include removal of any contaminated berm materials and/or unsuitable berm materials such as sandy soils, gravels, or cobblestones. Tank battery berms should be built of compactable caliche that is capable of fluid containment.
- 3. The BLM may wish to inspect the excavation once it reaches cleanup depth/width. Confirmation samples of excavation sidewalls and any visibly affected areas outside of the excavation trench will be required; the BLM may witness the sampling. Contact the authorized officer to schedule.
- 4. Lab analysis of the confirmation sampling must be forwarded to the authorized officer for final approval before backfilling. Based on the sampling results, additional cleanup may be required or the site may be approved for closure.
- 5. Once final approval of cleanup is given, the excavation can be backfilled with compactable caliche to the level of the original native contour plus enough loft to accommodate the settling and compaction of unconsolidated fill soils.
- 6. Install secondary containment berms of good quality compactable caliche around existing production equipment and the pad to prevent future spills from being released off the facility location.
- 7. Restore, recontour, and reseed any pasture disturbances that were created during the cleanup operations.

Other Stipulations:

- 1. At the time of the final onsite for this location, the production facilities, well pad, access road, and the surrounding pasture areas must be in a condition that will pass a routine inspection.
- 2. All household trash, debris, disconnected pipe and equipment must be removed from the area and the surrounding pasture and hauled to an authorized landfill. Do not bury cleanup trash, equipment debris, or household garbage in the cleanup excavation.

BLM approval of this proposal 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 location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until 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.

Thank you for your attention to this matter,

Terry Gregston

Environmental Protection Specialist Bureau of Land Management 620 E. Greene St. Carlsbad, NM 88220 Office (575) 234-5958 Cell (575) 361-2635 Fax (575) 234-5927

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