

# Closure Report

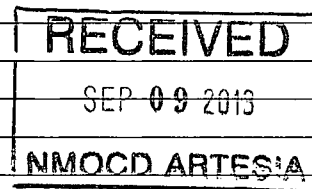
Site Description	
Site Name:	Federal C 35 #003
Company:	Oxy Permian Ltd.
Legal Description:	U/L K, Section 4, T18S, R33E
County:	Eddy County, NM
GPS Coordinates:	N 32.43196° W 104.57110°

Release Data	
Date of Release:	09/21/2012
Type of Release:	Produced Water
Source of Release:	Failure in 3" poly production line
Volume of Release:	20 bbls
Volume Recovered:	0 bbls

Remediation Specifications	
Remediation Parameters:	Excavate 1.5' of material across the entire impacted area. Obtain confirmation samples of sidewalls and affected areas outside trench. Perform BTEX and TPH sampling at bottom of sump upon excavation of spillage. Backfill excavation with clean soil. Resurface roads. Re-seed as necessary.
Remediation Activities:	08/05/2013 to 09/03/2013

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:	01/15/2013	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 09/25/2012
Final C-141	Signed 09/05/2013
Site Diagram	September 2012
Groundwater Plot	150'
TOPO Maps	September 2012
Lab Summary	11/12/2012
Lab Analysis	11/12/2012
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.	09/06/2013

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

☒ 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	Federal C 35 #003	Facility Type	Production

Surface Owner	Mineral Owner	Lease No.	API#30-015-30619
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#### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
K	4	18S	33E					Eddy County, NM

Latitude N 32.43196° Longitude W 104.57110°

#### NATURE OF RELEASE

Type of Release	Produced water	Volume of Release	20 bbls	Volume Recovered	0 bbls
Source of Release	Failure in 3" poly production line	Date and Hour of Occurrence	9/21/2012 @ 8:00 am	Date and Hour of Discovery	
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Mike Bratcher- NMOCD, Terry Gregston-BLM		
By Whom?	Christopher Jones	Date and Hour	09/21/2012 @ 9:10 am		
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.\*

RECEIVED

SEP 09 2013

Describe Cause of Problem and Remedial Action Taken.\*

The failure of a 3" poly production line caused 20 bbls of produced water to leak onto the ground. 0 bbls were recovered and the line was repaired.

NMOCD ARTESIA

Describe Area Affected and Cleanup Action Taken.\*

The area affected was approximately 60' x 60'. Remediation will be performed according to an OCD and BLM approved remediation plan.

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

#### OIL CONSERVATION DIVISION

Signature:

Printed Name: Christopher Jones

Approved by District Supervisor:

Title: HES Specialist

Approval Date:

Expiration Date:

E-mail Address: Christopher.Jones@oxy.com

Conditions of Approval:

Attached ☐

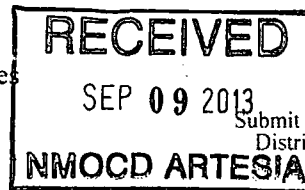
Date: 09/25/2012

Phone: (575) 628-4121

\* Attach Additional Sheets If Necessary

District I  
1625 N. French Dr., Hobbs, NM 88240  
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District III  
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  
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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	Federal C 35 #003	Facility Type	Production

Surface Owner	Mineral Owner	Lease No.	API#30-015-30619
---------------	---------------	-----------	------------------

#### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
K	4	18S	33E					Eddy County, NM

Latitude N 32.43196° Longitude W 104.57110°

#### NATURE OF RELEASE

Type of Release	Produced water	Volume of Release	20 bbls	Volume Recovered	0 bbls
Source of Release	Failure in 3" poly production line	Date and Hour of Occurrence	9/21/2012 @ 8:00 am	Date and Hour of Discovery	
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Mike Bratcher- NMOC D, Terry Gregston-BLM		
By Whom?	Christopher Jones	Date and Hour	09/21/2012 @ 9:10 am		
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.\*

The failure of a 3" poly production line caused 20 bbls of produced water to leak onto the ground. 0 bbls were recovered and the line was repaired.

Describe Area Affected and Cleanup Action Taken.\*

The area affected was approximately 60' x 60'. Remediation was completed in accordance with the remediation plan approved by Mike Bratcher of NMOC D via email on 01/15/2013 and approved by Terry Gregston of the 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 NMOC D 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 NMOC D 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, NMOC D acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

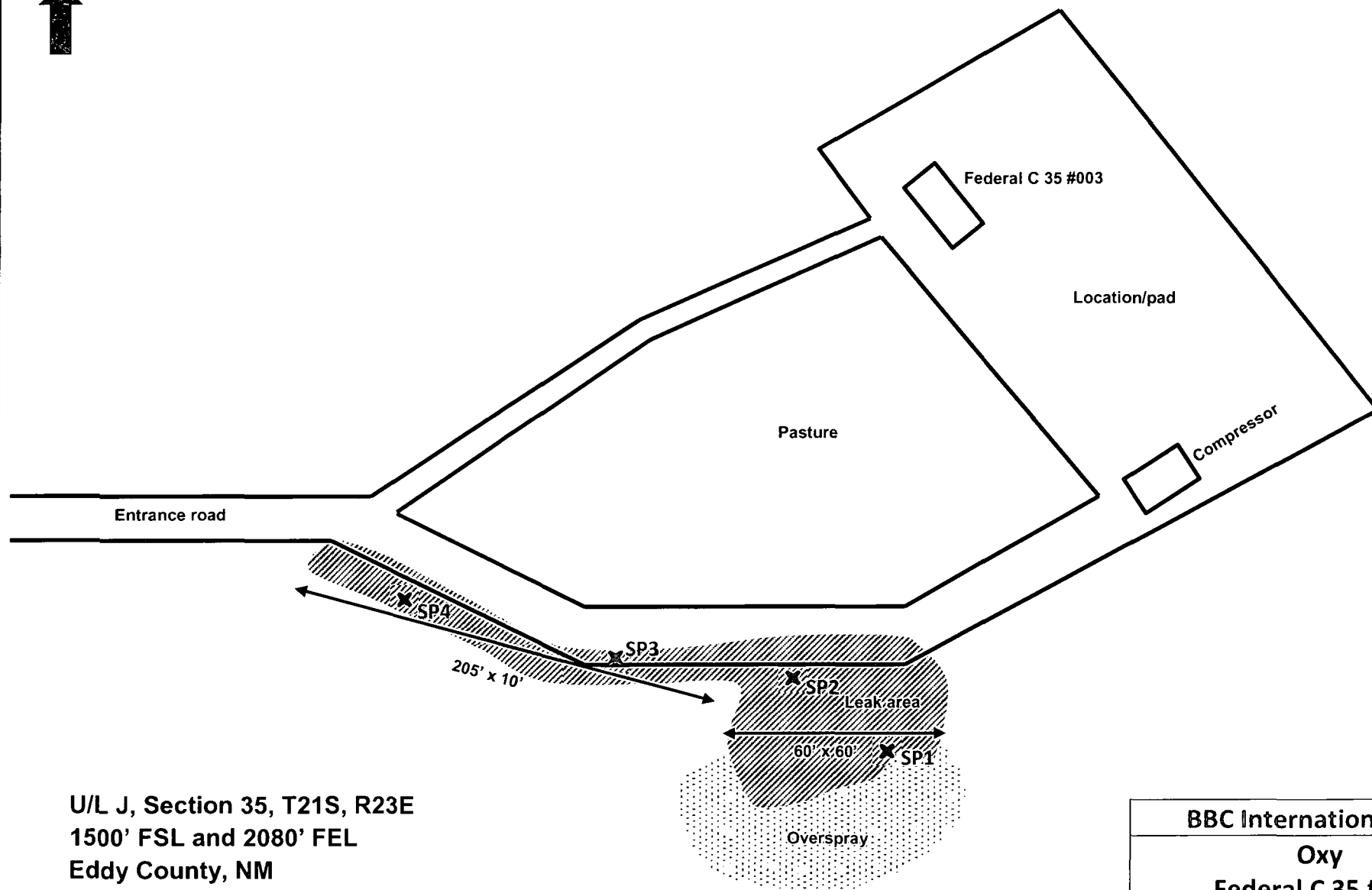
#### OIL CONSERVATION DIVISION

Signature:	Approved by District Supervisor:		
Printed Name: Christopher Jones			
Title: HES Specialist	Approval Date:	Expiration Date:	
E-mail Address: Christopher Jones@oxy.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 9-5-13	Phone: (575) 628-4121		

\* Attach Additional Sheets If Necessary



Oxy  
Federal C 35 #003



U/L J, Section 35, T21S, R23E  
1500' FSL and 2080' FEL  
Eddy County, NM  
N 32.43196° W 104.5711°  
API# 30-015-30619

BBC International, Inc.

Oxy  
Federal C 35 #003

Date: 9/25/12

DRWG by: K. Purvis

NOT TO SCALE

File: Oxy 2012



# Groundwater Plot

## Oxy Federal C 35 #003

County  
Eddy

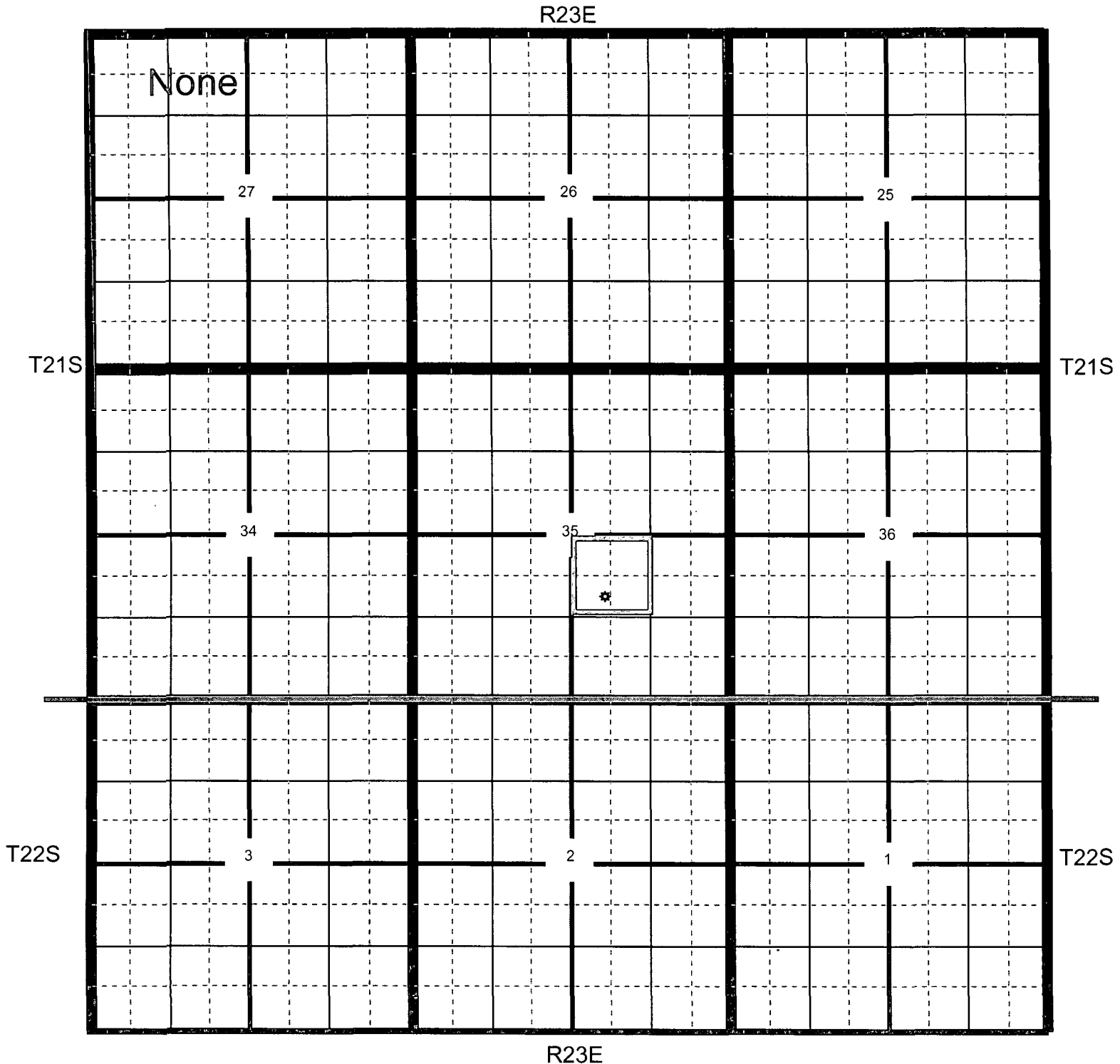
Unit Letter  
J

Section  
35

Township  
21S

Range  
23E

Trend Map 150'



★ Location

○ OCD

○ USGS

○ SEO

● All Databases

# Oxy Federal C 35 #003

<b>County</b> Eddy	<b>Unit Letter</b> J	<b>Section</b> 35	<b>Township</b> 21S	<b>Range</b> 23E
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Trend Map 150'

1

2

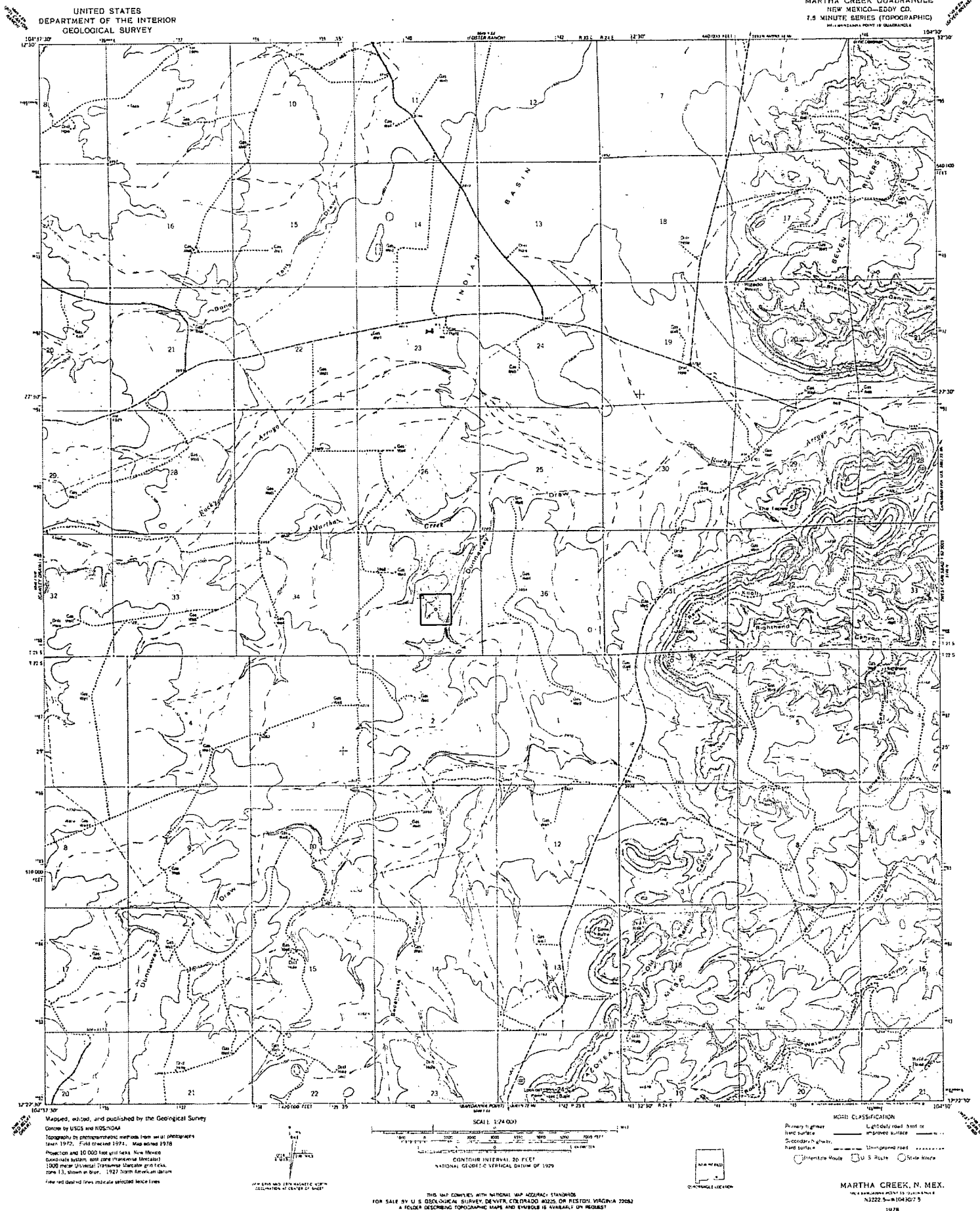
NW/NW None	NE/NW	NW/NE	NE/NE
Unit Letter D	Unit Letter C	Unit Letter B	Unit Letter A
SW/NW	SE/NW	SW/NE	SE/NE
Unit Letter E	Unit Letter F	Unit Letter G	Unit Letter H
NW/SW	NE/SW	NW/SE * Unit Letter J	NE/SE
Unit Letter L	Unit Letter K	Unit Letter I	Unit Letter H
SW/SW	SE/SW	SW/SE	SE/SE
Unit Letter M	Unit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

3

4

Oxy

# Federal C 35 #003



**Laboratory Analytical Results Summary  
Federal C-35 #003**

		Sample	SP1 @ SURFACE	SP1 @ 1.5'	SP1 @ 2'3"
Analyte	Method	Date	11/12/12	11/12/12	11/14/12
			mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		N/A	N/A	<0.050
Toluene	BTEX 8021B		N/A	N/A	<0.050
Ethylbenzene	BTEX 8021B		N/A	N/A	<0.050
Total Xylenes	BTEX 8021B		N/A	N/A	<0.150
Total BTEX	BTEX 8021B		N/A	N/A	<0.300
Chloride	SM4500Cl-B		1340	1250	16
GRO	TPH 8015M		N/A	N/A	<10.0
DRO	TPH 8015M		N/A	N/A	<10.0

		Sample	SP2 @ SURFACE	SP2 @ 1.5'	SP2 @ 2'3"
Analyte	Method	Date	11/12/12	11/12/12	11/14/12
			mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		N/A	N/A	N/A
Toluene	BTEX 8021B		N/A	N/A	N/A
Ethylbenzene	BTEX 8021B		N/A	N/A	N/A
Total Xylenes	BTEX 8021B		N/A	N/A	N/A
Total BTEX	BTEX 8021B		N/A	N/A	N/A
Chloride	SM4500Cl-B		400	2000	16
GRO	TPH 8015M		N/A	N/A	N/A
DRO	TPH 8015M		N/A	N/A	N/A

		Sample	SP3 @ SURFACE	SP3 @ 2'	SP3 @ 3.5'
Analyte	Method	Date	11/12/12	11/12/12	11/14/12
			mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		N/A	N/A	<0.050
Toluene	BTEX 8021B		N/A	N/A	<0.050
Ethylbenzene	BTEX 8021B		N/A	N/A	<0.050
Total Xylenes	BTEX 8021B		N/A	N/A	<0.150
Total BTEX	BTEX 8021B		N/A	N/A	<0.300
Chloride	SM4500Cl-B		336	320	16
GRO	TPH 8015M		N/A	N/A	<10.0
DRO	TPH 8015M		N/A	N/A	<10.0

		Sample	SP4 @ SURFACE	SP4 @ 2'	SP4 @ 2.5'
Analyte	Method	Date	11/12/12	11/12/12	11/14/12
			mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		N/A	N/A	N/A
Toluene	BTEX 8021B		N/A	N/A	N/A
Ethylbenzene	BTEX 8021B		N/A	N/A	N/A
Total Xylenes	BTEX 8021B		N/A	N/A	N/A
Total BTEX	BTEX 8021B		N/A	N/A	N/A
Chloride	SM4500Cl-B		1040	336	16
GRO	TPH 8015M		N/A	N/A	N/A
DRO	TPH 8015M		N/A	N/A	N/A



November 20, 2012

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: FEDERAL C-35 #003

Enclosed are the results of analyses for samples received by the laboratory on 11/15/12 10:00.

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,



Celey D. Keene

Lab Director/Quality Manager

**Analytical Results For:**

 BBC International, Inc.  
 Cliff Brunson  
 P.O. Box 805  
 Hobbs NM, 88241  
 Fax To: (505) 397-0397

 Received: 11/15/2012  
 Reported: 11/20/2012  
 Project Name: FEDERAL C-35 #003  
 Project Number: NONE GIVEN  
 Project Location: EDDY COUNTY, NM

 Sampling Date: 11/12/2012  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 1 @ SURFACE (H202773-01)**

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AP				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1340	16.0	11/19/2012	ND	416	104	400	0.00	

**Sample ID: SP 1 @ 1.5' (H202773-02)**

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AP				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1250	16.0	11/19/2012	ND	416	104	400	0.00	

**Sample ID: SP 1 @ 2' 3" (H202773-03)**

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	11/17/2012	ND	1.66	83.0	2.00	10.7	
Toluene*	<0.050	0.050	11/17/2012	ND	1.96	97.9	2.00	10.7	
Ethylbenzene*	<0.050	0.050	11/17/2012	ND	2.00	100	2.00	11.0	
Total Xylenes*	<0.150	0.150	11/17/2012	ND	6.04	101	6.00	11.2	
Total BTX	<0.300	0.300	11/17/2012	ND					

Surrogate: 4-Bromofluorobenzene (PIL) 118 % 89.4-126

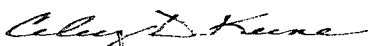
Chloride, SM4500Cl-B			mg/kg		Analyzed By: AP				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	11/19/2012	ND	416	104	400	0.00	

TPH 8015M			mg/kg		Analyzed By: MS				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier

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: (505) 397-0397

 Received: 11/15/2012  
 Reported: 11/20/2012  
 Project Name: FEDERAL C-35 #003  
 Project Number: NONE GIVEN  
 Project Location: EDDY COUNTY, NM

 Sampling Date: 11/14/2012  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 1 @ 2' 3" (H202773-03)**

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	11/16/2012	ND	191	95.3	200	1.29	
DRO >C10-C28	<10.0	10.0	11/16/2012	ND	206	103	200	1.52	
Surrogate: 1-Chlorooctane	80.0 %	65.2-140							
Surrogate: 1-Chlorooctadecane	86.4 %	63.6-154							

**Sample ID: SP 2 @ SURFACE (H202773-04)**

Chloride, SM4500Cl-B	mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	400	16.0	11/19/2012	ND	416	104	400	0.00	

**Sample ID: SP 2 @ 1.5' (H202773-05)**

Chloride, SM4500Cl-B	mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2000	16.0	11/19/2012	ND	416	104	400	0.00	

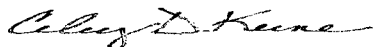
**Sample ID: SP 2 @ 2' 3" (H202773-06)**

Chloride, SM4500Cl-B	mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	11/19/2012	ND	416	104	400	0.00	

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: (505) 397-0397

Received: 11/15/2012  
Reported: 11/20/2012  
Project Name: FEDERAL C-35 #003  
Project Number: NONE GIVEN  
Project Location: EDDY COUNTY, NM

Sampling Date: 11/12/2012  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: SP 3 @ SURFACE (H202773-07)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	336	16.0	11/19/2012	ND	416	104	400	0.00		

**Sample ID: SP 3 @ 2' (H202773-08)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	320	16.0	11/19/2012	ND	416	104	400	0.00		

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: (505) 397-0397

 Received: 11/15/2012  
 Reported: 11/20/2012  
 Project Name: FEDERAL C-35 #003  
 Project Number: NONE GIVEN  
 Project Location: EDDY COUNTY, NM

 Sampling Date: 11/14/2012  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 3 @ 3.5' (H202773-09)**

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	11/17/2012	ND	1.66	83.0	2.00	10.7		
Toluene*	<0.050	0.050	11/17/2012	ND	1.96	97.9	2.00	10.7		
Ethylbenzene*	<0.050	0.050	11/17/2012	ND	2.00	100	2.00	11.0		
Total Xylenes*	<0.150	0.150	11/17/2012	ND	6.04	101	6.00	11.2		
Total BTEX	<0.300	0.300	11/17/2012	ND						

Surrogate: 4-Bromofluorobenzene (PIE) 120 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	11/19/2012	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	11/16/2012	ND	191	95.3	200	1.29	
DRO >C10-C28	<10.0	10.0	11/16/2012	ND	206	103	200	1.52	

Surrogate: 1-Chlorooctane 86.8 % 65.2-140

Surrogate: 1-Chlorooctadecane 97.3 % 63.6-154

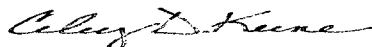
**Sample ID: SP 4 @ SURFACE (H202773-10)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1040	16.0	11/19/2012	ND	416	104	400	0.00	

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: (505) 397-0397

Received: 11/15/2012  
Reported: 11/20/2012  
Project Name: FEDERAL C-35 #003  
Project Number: NONE GIVEN  
Project Location: EDDY COUNTY, NM

Sampling Date: 11/12/2012  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: SP 4 @ 2' (H202773-11)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	336	16.0	11/19/2012	ND	416	104	400	0.00	

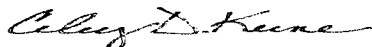
**Sample ID: SP 4 @ 2.5' (H202773-12)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	11/20/2012	ND	400	100	400	0.00	

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Celey D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

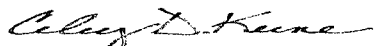
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received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

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



1 of 2

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





101 East Marland, Hobbs, NM 88240

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

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

202

<b>BILL TO</b>			<b>ANALYSIS REQUEST</b>																	
Company Name: BBC International, Inc.			P.O. #:																	
Project Manager: Cliff Brunson			Company:																	
Address: P.O. Box 805			Attn:																	
City: Hobbs State: NM Zip: 88241		Address:																		
Phone #: 575-397-6388 Fax #: 575-397-0397		City:																		
Project #: Project Owner: Oxy		State: Zip:																		
Project Name: Federal C-35 #003			Phone #:																	
Project Location: Eddy County, NM			Fax #:																	
Sampler Name: Jeff Ornelas																				
FOR LAB USE ONLY		MATRIX	PRESERV.	SAMPLING																
Lab I.D.	Sample I.D.	# CONTAINERS (G/RAB OR C/JOMP.)	GROUNDEWATER WASTEWATER SOIL OIL SLUDGE OTHER :	ACID/BASE: ICE / COOL OTHER :	DATE	TIME														
H202973	SP4 @ 2'	5	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	11/12/12	3:20 PM	<input checked="" type="checkbox"/>													
12	SP4 @ 2.5'	5	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	11/14/12	2:08 PM	<input checked="" type="checkbox"/>													
<div style="text-align: center; transform: rotate(-30deg); font-weight: bold;">K&amp;P 11/15/12</div>																				

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Relinquished By: _____ <div style="font-size: small;">Signature</div>	Date: 11-15-12 Time: 10:00	Received By: <u>Jodi Benson</u> <div style="font-size: small;">Signature</div>	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #:	Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Fax #:
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	Date: Time:	Received By: Sample Condition Cool Intact <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No	CHECKED BY: (Initials) <u>[initials]</u>	REMARKS:

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

## Kathy Purvis

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**From:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>  
**Sent:** Tuesday, January 15, 2013 9:37 AM  
**To:** Cliff P. Brunson  
**Cc:** Chris Jones; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** RE: Oxy Federal C 35 #003

Reference: OXY USA \* Federal C 35 – 3 \* 30-015-30619 \* J-35-21s-23e \* Eddy County, New Mexico  
NMOCD Tracking Number: 2RP-1320 \* Date of release: 9/21/12

Cliff,

Your proposal for remediation of the above referenced release is approved. This site is situated on federal surface and may 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, 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 6:58 PM  
**To:** Bratcher, Mike, EMNRD  
**Cc:** Chris Jones; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** Oxy Federal C 35 #003

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 Federal C 35 #003. 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 1.5 feet across the entire impacted area as depicted on the attached site diagram. The excavation will then be backfilled with clean soil. The depth to groundwater in this area is approximately 150 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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## Kathy Purvis

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**From:** Cliff P. Brunson <cbrunson@bbcinternational.com>  
**Sent:** Wednesday, January 30, 2013 4:02 PM  
**To:** Kathy Purvis  
**Subject:** FW: Undesirable Event: NU12219TG, Federal C 35 3: cleanup plan approval stip

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

\*\*\*\*\*

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**From:** Terry Gregston <[tgregsto@blm.gov](mailto:tgregsto@blm.gov)>  
**Date:** Wednesday, January 30, 2013 3:20 PM  
**To:** James Amos <[jamoss@blm.gov](mailto:jamoss@blm.gov)>, Chris Jones <[Christopher\\_Jones@oxy.com](mailto:Christopher_Jones@oxy.com)>, Ken Swinney <[kswinney@bbcinternational.com](mailto:kswinney@bbcinternational.com)>, Mike Bratcher <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>, Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)>  
**Subject:** Undesirable Event: NU12219TG, Federal C 35 3: cleanup plan approval stip

Gentlemen,

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

Event Number: NU12219TG  
Event Date: 9/21/2012  
Event Name: Federal C 35 3  
Legals: T21S/R23E, sec. 35, NWSE

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.
  - f. In the event that you encounter excavation difficulties, unexpected void areas, or archeological artifacts the Authorized Officer must be contacted immediately. An onsite may be required to assess the situation.
3. The authorized officer on this undesirable event case is:

**Terry Gregston**  
**(575) 361-2635**  
**[tgregsto@blm.gov](mailto:tgregsto@blm.gov)**

### **Plan Implementation:**

1. Cleanup actions must be initiated within **30** days of plan approval.

### **Special Stipulations:**

1. The mechanical and/or maintenance problem that causes the compressor sump to overflow must be addressed. Spillage associated with overflowing sump on the compressor will be picked up and hauled off; bottom of sump excavation will be sampled for BTEX, TPH. Excavation will be left open for inspection; samples will be forwarded to a third party lab for analysis; and lab analysis will be forwarded to the BLM for approval prior to closure.
2. Disconnected pipage and equipment in pasture must be picked up and hauled to an authorized landfill; all trash will be picked up and removed.
3. All load line and chemical barrel catchments must be properly netted.
4. All of the above stipulations are standard compliance requirements and are subject to issuance of Incidents of Noncompliance. Operator is strongly encouraged to place a liner under all compressor installations, particularly in critical and high cave/karst areas. This location is in a high cave/karst area.

### **Road Cleanup Stipulations:**

1. The BLM requires horizontal cleanup of the spill impacted areas in addition to vertical cleanup/mitigation measures.
2. 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.
3. 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.
4. Once final approval of cleanup is given, the excavation can be backfilled with clean soil to the level of the original native contour plus enough loft to accommodate the settling and compaction of unconsolidated fill soils.
5. Road areas should be resurfaced with 6" of clean caliche on top of the backfill material.

### **Pasture Impacted Areas:**

1. The BLM requires horizontal cleanup of the spill impacted areas in addition to vertical cleanup/mitigation measures.
2. 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.
3. 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.
4. Once final approval of cleanup is given, the excavation can be backfilled with clean soil to the level of the original native contour plus enough loft to accommodate the settling and compaction of unconsolidated fill soils.
5. The top 1 feet of the backfill material must be topsoil similar to that in the surrounding native terrain.
6. If pastures are not contaminated but are impacted by cleanup operations, the impacts to the pasture areas will mitigated by recontouring the impacted areas and restoring the surface as listed in items 7 through 9 of this section.
7. Install erosion control measures in the pasture-affected areas to prevent the unconsolidated reclamation materials from washing or blowing away until reclaimed areas settle and begin to revegetate.
8. Rip and seed reclaimed and equipment-impacted pasture areas with BLM seed mix #3 and #4, 50/50 mix.
9. Barricade reclaimed pasture areas with fencing or an earthen barrier sufficient to prevent vehicular access throughout the length of the reclamation that faces the road.
10. Continue to monitor spill reclamation area to ensure impacted pasture areas revegetate and that erosion issues do not develop.

**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. 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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