

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

APR 17 2014

State of New Mexico  
Energy Minerals and Natural Resources

Form C-141  
Revised August 8, 2011

RECEIVED

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

Submit 1 Copy to appropriate District Office in  
accordance with 19.15.29 NMAC.

**Release Notification and Corrective Action**

**OPERATOR**

Initial Report  Final Report

Name of Company	Oxy Permian Ltd.	Contact	Chancey Summers
Address	1017 W. Stanolind Rd, Hobbs, NM 88240	Telephone No.	(575) 397-8216
Facility Name	Gillully B Federal #18	Facility Type	Well

Surface Owner	Jimmy Cooper	Mineral Owner		API No.	30-025-25865
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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
A	21	20S	37E	660	North	990	East	Lea County, NM

Latitude N 32.56390° Longitude W103.25058°

**NATURE OF RELEASE**

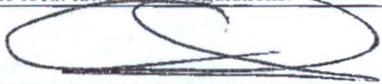
Type of Release	Oil and produced water	Volume of Release	4 bbls oil and 8 bbls water	Volume Recovered	0 bbls
Source of Release	Stuffing box leak	Date and Hour of Occurrence	12/08/2013	Date and Hour of Discovery	
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?			
By Whom?		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.\*  
A stuffing box leak caused 4 bbls of oil and 8 bbls of produced water to leak onto the ground. No fluids were recovered and the stuffing box was repaired or replaced.

Describe Area Affected and Cleanup Action Taken.\*  
The affected area is approximately 25' x 40' on location. Remediation was completed in accordance with a remediation plan approved by Geoffrey Leking of NMOCD via email on 03/10/2014 and Jennifer Van Curen of the BLM via email on 03/09/2014.

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 poses 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 liability should their operations have failed to adequately investigate and remediate contamination that poses 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 liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to ground water, surface water, human health or the environment.

Signature: 

Printed Name: Chancey Summers

Title: HES Specialist

E-mail Address: Chancey.Summers@oxy.com

Date: 4-15-14 Phone: (575) 397-8216

**APPROVED**

Approved

Approval Date: 2/3/16 Expiration Date:

Conditions of Approval:

Attached

\* Attach Additional Sheets If Necessary

RP-4134

# Closure Report

HOBBS OCD

APR 17 2014

Site Description	
Site Name:	Gilliully B Federal #18
Company:	Oxy Permian Ltd.
Legal Description:	U/L A, Section 21, T20S, R37E
County:	Lea County, NM
GPS Coordinates:	N 32.56401° W 103.25117°

Release Data	
Date of Release:	12/08/2013
Type of Release:	Oil and Produced water
Source of Release:	Stuffing box leak
Volume of Release:	4 bbls oil and 8 bbls produced water
Volume Recovered:	0 bbls

Remediation Specifications	
Remediation Parameters:	Excavate the entire leak site to a depth of 2 feet and place a clay liner in the excavation. Backfill the excavation areas with clean soil.
Remediation Activities:	4/7/14 to 4/9/14

Plan Sent to OCD:	03/08/2014	Email from Cliff Brunson to Geoffrey Leking
OCD Approval of Plan:	03/11/2014	Email from Geoffrey Leking to Cliff Brunson
Plan Sent to BLM:	03/08/2014	Email from Cliff Brunson to J. Van Curen
BLM Approval of Plan:	03/09/2014	Email from J. Van Curen to Cliff Brunson

Supporting Documentation	
Initial C-141	Signed 12/20/2013
Final C-141	Signed 04/15/2014
Site Diagram	January 2014
Groundwater Plot	<50'
TOPO Maps	January 2014
Lab Summary	01/30/2014
Lab Analysis	01/30/2014
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.	04/16/2014

HOBBS OCD

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### Release Notification and Corrective Action

#### OPERATOR

Initial Report  Final Report

Name of Company	Oxy Permian Ltd.	Contact	Chancey Summers
Address	1017 W. Stanolind Rd, Hobbs, NM 88240	Telephone No.	(575) 397-8216
Facility Name	Gillully B Federal #18	Facility Type	Well
Surface Owner	Jimmy Cooper	Mineral Owner	
		API No.	30-025-25865

#### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
A	21	20S	37E	660	North	990	East	Lea County, NM

Latitude N 32.56390° Longitude W103.25058°

#### NATURE OF RELEASE

Type of Release	Oil and produced water	Volume of Release	4 bbls oil and 8 bbls water	Volume Recovered	0 bbls
Source of Release	Stuffing box leak	Date and Hour of Occurrence	12/08/2013	Date and Hour of Discovery	
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?			
By Whom?		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.\*

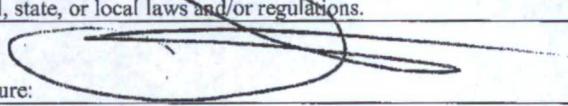
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I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform 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:	Chancey Summers	Approved by Environmental Specialist:	
Title:	HES Specialist	Approval Date:	Expiration Date:
E-mail Address:	Chancey.Summers@oxy.com	Conditions of Approval:	
Date:	12-20-13	Phone:	(575) 397-8216
			Attached <input type="checkbox"/>

\* Attach Additional Sheets If Necessary

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**OPERATOR**  Initial Report  Final Report

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Facility Name	Gillully B Federal #18	Facility Type	Well
Surface Owner	Jimmy Cooper	Mineral Owner	API No. 30-025-25865

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By Whom?		Date and Hour			
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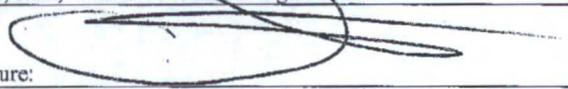
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OIL CONSERVATION DIVISION

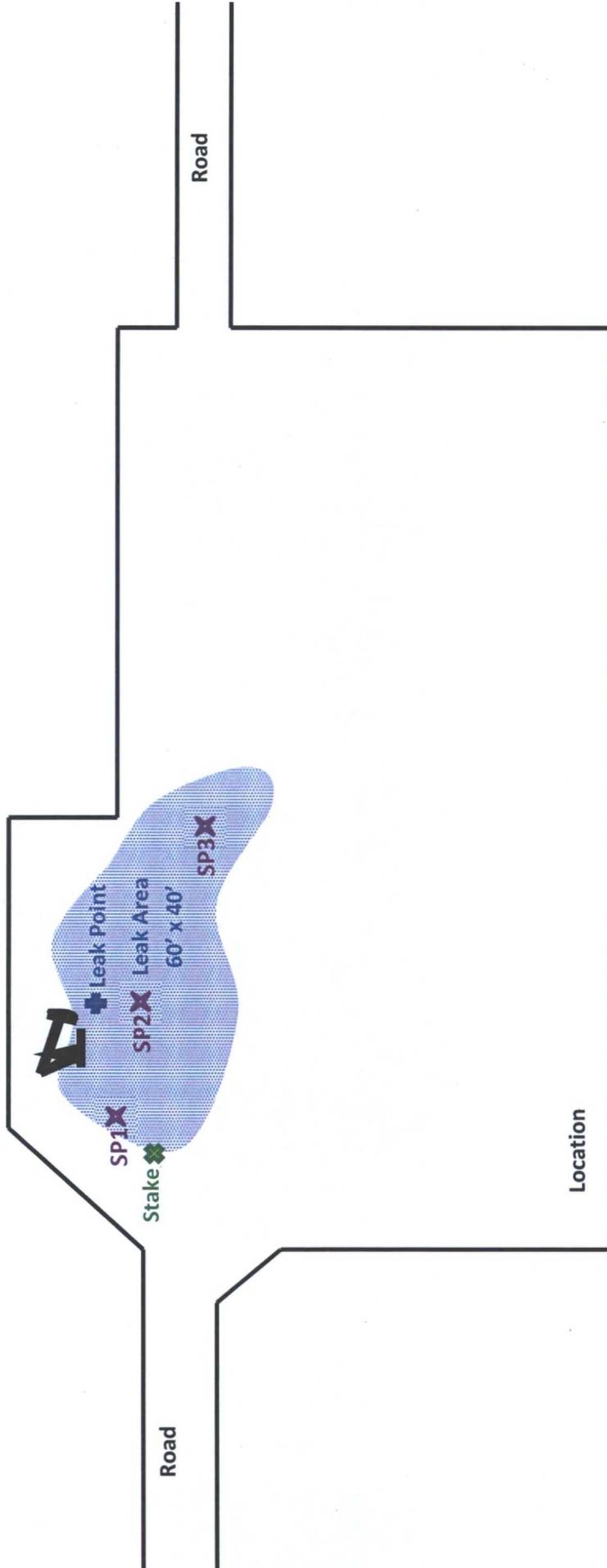
Signature:			
Printed Name: Chancey Summers	Approved by Environmental Specialist:		
Title: HES Specialist	Approval Date:	Expiration Date:	
E-mail Address: Chancey.Summers@oxy.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 12-20-13	Phone: (575) 397-8216		

\* Attach Additional Sheets If Necessary



Oxy

Gillully B Federal #18



U/L A, Section 21, T20S, R37E

660' FNL, 990' FEL

Lea County, NM

GPS at stake:

N 32.56401° W 103.25117°

API# 30-025-25865

BBC International, Inc.

Oxy

Gillully B Federal #18

Date: 01/02/2014 DRWG by: K. Purvis

NOT TO SCALE File: Oxy 2013



# Groundwater Plot

## Oxy Gillully B Federal #18

County  
Lea

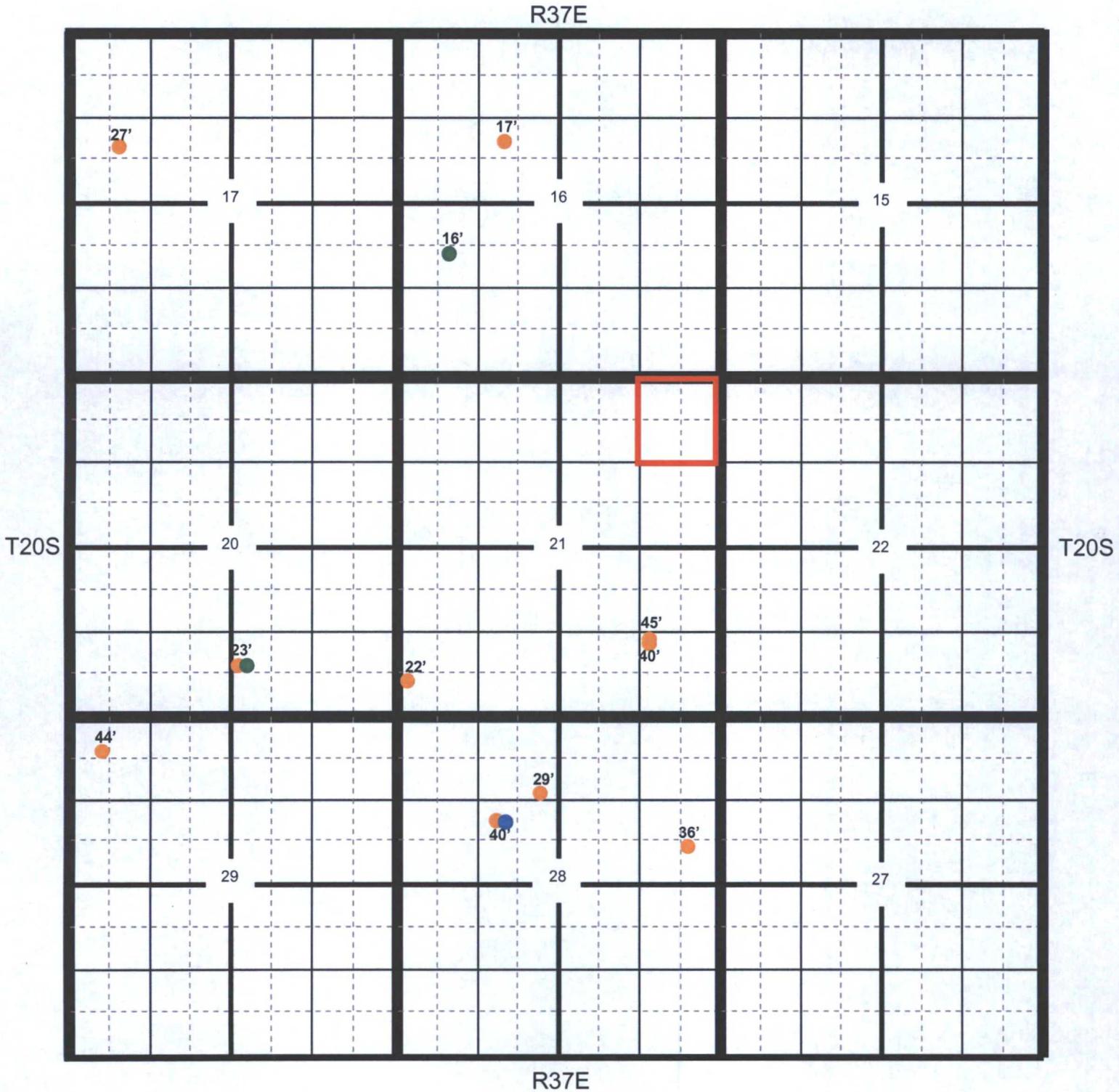
Unit Letter  
A

Section  
21

Township  
20S

Range  
37E

Trend Map <50'



Location

OCD

USGS

SEO

All Databases

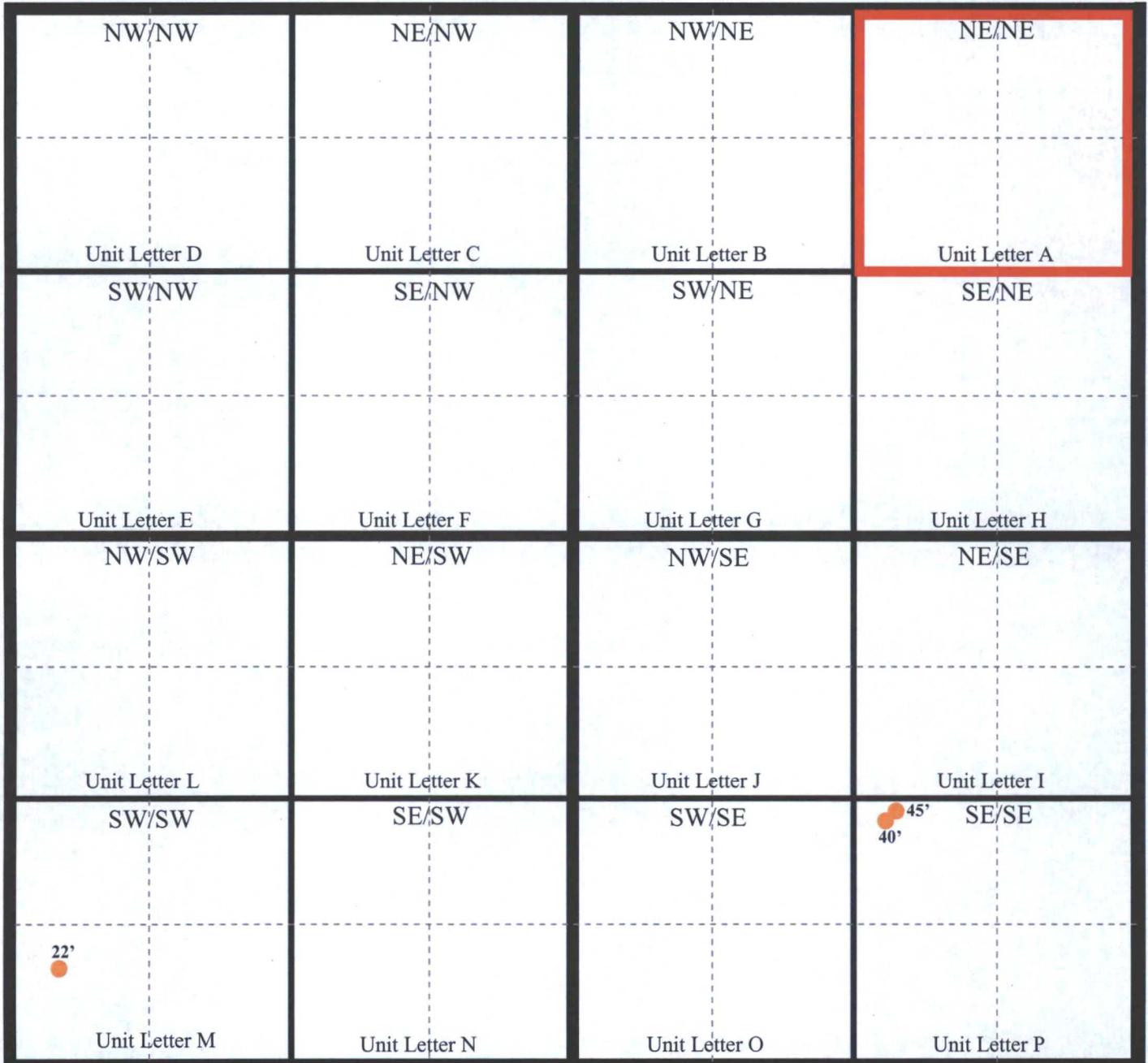
# Oxy Gillully B Federal #18

County: Lea      Unit Letter: A      Section: 21      Township: 20S      Range: 37E

Trend Map <50'

1

2



3

4

# Oxy

## Gillully B Federal #18

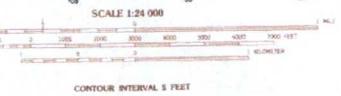
MONUMENT SOUTH QUADRANGLE  
NEW MEXICO-LEA CO.  
7.5 MINUTE SERIES (TOPOGRAPHIC)

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
GEOLOGICAL SURVEY



PRODUCED BY THE UNITED STATES GEOLOGICAL SURVEY  
CONTRIBUTED FROM AERIAL PHOTOGRAPHS TAKEN BY THE  
FIELD CHECKERS IN 1959 MAP EXTENDED TO 1963  
PROJECTION TRANSVERSE MERCATOR  
GRID 1983-METER UNIVERSAL TRANSVERSE MERCATOR  
UNIT 13  
DATUM NORTH AMERICAN DATUM 1983  
VERTICAL DATUM NATIONAL GEODESIC DATUM OF 1983  
VERTICAL DATUM NATIONAL GEODESIC DATUM OF 1983  
To place on the predicted North American Datum of 1983, since  
the projection base is shown by dashed corner ticks  
(9 meters south and 84 meters east)  
There may be private buildings within the boundaries of any  
Federal and State Reservations shown on this map

**PROVISIONAL MAP**  
Produced from original  
manuscript drawings. Infor-  
mation shown as of date of  
field check.



1	2	3	4	5	6	7	8	9
1	2	3	4	5	6	7	8	9

1 Settlement Core  
2 Wetland Area  
3 Wetland Off  
4 Wetland Off  
5 Wetland Off  
6 Wetland Off  
7 Wetland Off  
8 Wetland Off  
9 Wetland Off

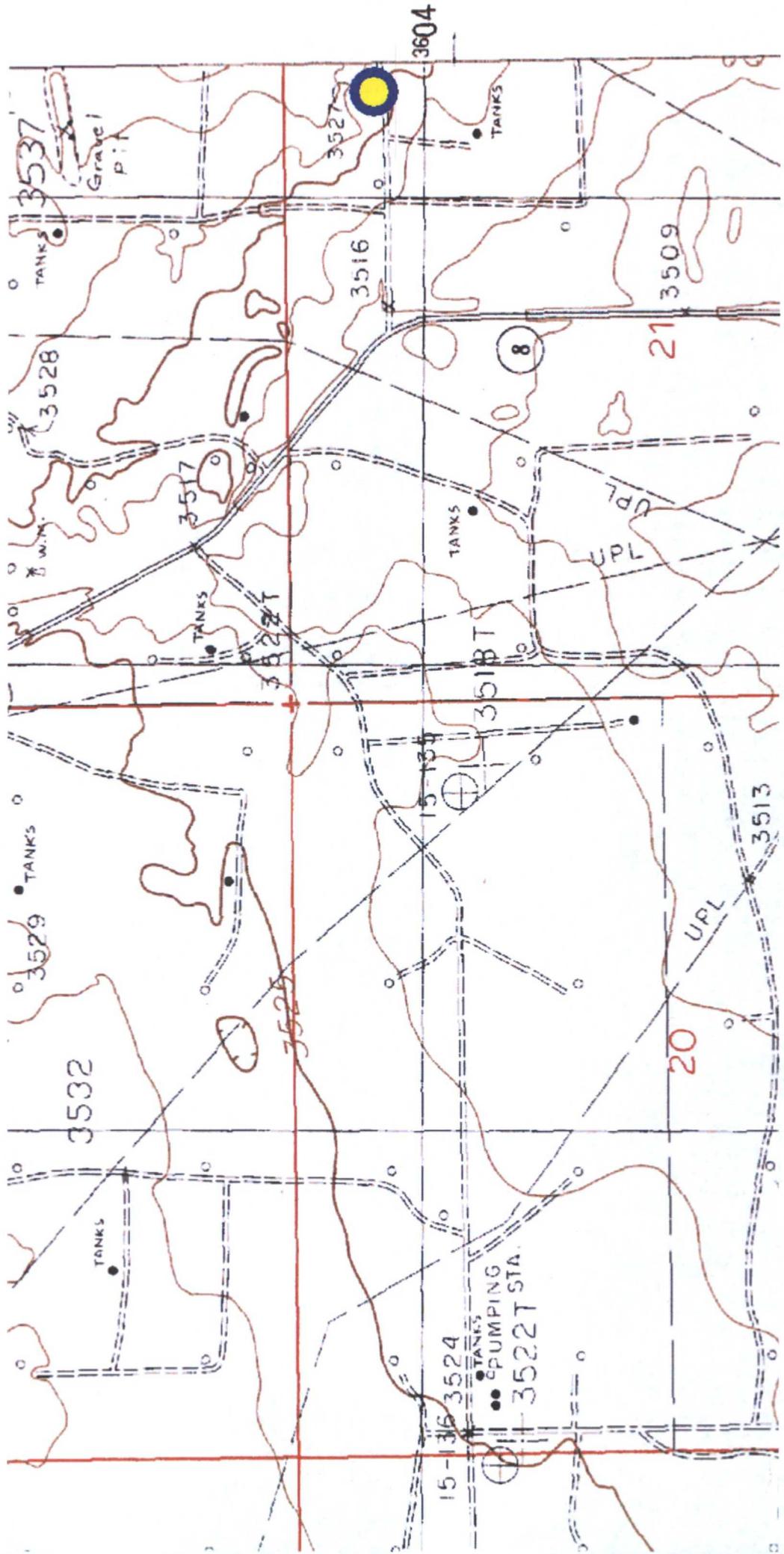
MONUMENT SOUTH, NEW MEXICO  
PROVISIONAL EDITION 1965

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS  
FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225  
OR RESTON, VIRGINIA 22092

32193-E3-17-02A

Oxy

# Gillully B Federal #18



Laboratory Analytical Results Summary  
Gillully B Fed #18

	Sample	SP1 @ 1'	SP1 @ 2'	SP1 @ 4'	SP1 @ 6'	SP1 @ 7'
Analyte	Date	1/30/14	1/30/14	1/30/14	1/30/14	1/30/14
	Method	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Chloride	SM4500Cl-B	928	176	384	416	272

	Sample	SP2 @ 1'	SP2 @ 2'	SP2 @ 4'	SP2 @ 6'	SP2 @ 8'
Analyte	Date	1/30/14	1/30/14	1/30/14	1/30/14	1/30/14
	Method	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Chloride	SM4500Cl-B	352	352	912	672	240

	Sample	SP3 @ 1'	SP3 @ 2'	SP3 @ 4'	SP3 @ 5'
Analyte	Date	1/30/14	1/30/14	1/30/14	1/30/14
	Method	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Chloride	SM4500Cl-B	<16.0	32	928	<16.0

February 07, 2014

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

RE: GILLULLY B FED #18

Enclosed are the results of analyses for samples received by the laboratory on 01/31/14 16:20.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](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: (575) 397-0397

 Received: 01/31/2014  
 Reported: 02/07/2014  
 Project Name: GILLULLY B FED #18  
 Project Number: NONE GIVEN  
 Project Location: NOT GIVEN

 Sampling Date: 01/30/2014  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 1 @ 1' (H400314-01)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	928	16.0	02/07/2014	ND	416	104	400	0.00		

**Sample ID: SP 1 @ 2' (H400314-02)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	176	16.0	02/07/2014	ND	416	104	400	0.00		

**Sample ID: SP 1 @ 4' (H400314-03)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	384	16.0	02/07/2014	ND	416	104	400	0.00		

**Sample ID: SP 1 @ 6' (H400314-04)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	416	16.0	02/07/2014	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: (575) 397-0397

 Received: 01/31/2014  
 Reported: 02/07/2014  
 Project Name: GILLULLY B FED #18  
 Project Number: NONE GIVEN  
 Project Location: NOT GIVEN

 Sampling Date: 01/30/2014  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 1 @ 7' (H400314-05)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	272	16.0	02/07/2014	ND	416	104	400	0.00		

**Sample ID: SP 2 @ 1' (H400314-06)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	352	16.0	02/07/2014	ND	416	104	400	0.00		

**Sample ID: SP 2 @ 2' (H400314-07)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	352	16.0	02/07/2014	ND	416	104	400	0.00		

**Sample ID: SP 2 @ 4' (H400314-08)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	912	16.0	02/07/2014	ND	416	104	400	0.00		

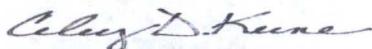
**Sample ID: SP 2 @ 6' (H400314-09)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	672	16.0	02/07/2014	ND	416	104	400	0.00		

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause 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:	01/31/2014	Sampling Date:	01/30/2014
Reported:	02/07/2014	Sampling Type:	Soil
Project Name:	GILLULLY B FED #18	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: SP 2 @ 8' (H400314-10)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	240	16.0	02/07/2014	ND	416	104	400	0.00		

**Sample ID: SP 3 @ 1' (H400314-11)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	02/07/2014	ND	416	104	400	0.00		

**Sample ID: SP 3 @ 2' (H400314-12)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	02/07/2014	ND	416	104	400	0.00		

**Sample ID: SP 3 @ 4' (H400314-13)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	928	16.0	02/07/2014	ND	416	104	400	0.00		

**Sample ID: SP 3 @ 5' (H400314-14)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	02/07/2014	ND	416	104	400	0.00		

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

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Celey D. Keene, Lab Director/Quality Manager





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

**CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

*2/2*

**ANALYSIS REQUEST**

Company Name: **BBC International, Inc.** P.O. #: **51179**

Project Manager: **Cliff Brunson** Company: \_\_\_\_\_

Address: **P.O. Box 805** Attn: \_\_\_\_\_

City: **Hobbs** State: **NM** Zip: **88241**

Phone #: **575-397-6388** Fax #: **575-397-0397** Address: **SAME**

Project #: \_\_\_\_\_ Project Owner: **OKY** City: \_\_\_\_\_

Project Name: **Gilkey 73 Feb # 18** State: \_\_\_\_\_ Zip: \_\_\_\_\_

Project Location: \_\_\_\_\_ Phone #: \_\_\_\_\_

Sampler Name: **Grey Ray** Fax #: \_\_\_\_\_

FOR LAB USE ONLY

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						DATE	TIME	CL
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:			
11	SP 30 1'		1			<input checked="" type="checkbox"/>				1/30/14	145	
12	2'		1			<input checked="" type="checkbox"/>				1/30/14	200	
13	4'		1			<input checked="" type="checkbox"/>				1/30/14	230	
14	5'		1			<input checked="" type="checkbox"/>				1/30/14	245	

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Relinquished By: **Grey Ray** Date: **1-31-14** Received By: **Cliff Brunson** Date: **1-31-14**

Relinquished By: **Grey Ray** Time: **4:00** Received By: **Cliff Brunson** Time: **4:20**

Delivered By: (Circle One) **UPS** Sample Condition:  Cool  Intact  Yes  No

Sampler - UPS - Bus - Other: **4-70** CHECKED BY: **Grey Ray** (Initials)

Phone Result:  Yes  No Add'l Phone #: \_\_\_\_\_

Fax Result:  Yes  No Add'l Fax #: \_\_\_\_\_

REMARKS: \_\_\_\_\_

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476 #54

## Kathy Purvis

---

**From:** Leking, Geoffrey R, EMNRD <GeoffreyR.Leking@state.nm.us>  
**Sent:** Monday, March 10, 2014 7:18 AM  
**To:** Cliff P. Brunson  
**Cc:** C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** RE: OXY-Gillully B Federal #18-Remediation Plan

Cliff

As per the below email and attachment as well as our meeting of 3/6/14, the remediation plan for the Gillully B Federal #18 is approved.

Geoffrey Leking  
Environmental Specialist  
NMOCD-Hobbs  
1625 N. French Drive  
Hobbs, NM 88240  
Office: (575) 393-6161 Ext. 113  
Cell: (575) 399-2990  
email: [geoffreyr.leking@state.nm.us](mailto:geoffreyr.leking@state.nm.us)

---

**From:** Cliff P. Brunson [<mailto:cbrunson@bbcinternational.com>]  
**Sent:** Saturday, March 08, 2014 5:44 PM  
**To:** Leking, Geoffrey R, EMNRD  
**Cc:** C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** OXY-Gillully B Federal #18-Remediation Plan

Geoff,

This e-mail is to confirm our conversation on March 6, 2014 about the remediation plan for the above referenced site. I have attached the materials that we used in our discussion. As discussed, Oxy will excavate to a depth of 1 foot in the area of SP1 and two feet across the rest of the leak area (SP2 and SP3) as shown on the diagram. The area of the spill represented by SP2 and SP3 will have a clay liner installed then the entire spill area will be backfilled with clean soil.

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

Thanks, Cliff

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

\*\*\*\*\*

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\*\*\*\*\*

## Kathy Purvis

---

**From:** Leking, Geoffrey R, EMNRD <GeoffreyR.Leking@state.nm.us>  
**Sent:** Tuesday, March 11, 2014 9:29 AM  
**To:** Cliff P. Brunson  
**Cc:** Chancey\_Summers@oxy.com; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** RE: Additional Comments on MLMU #139, Gillully B Federal #18 and Warren McKee Unit #501

Cliff

Thank you. I had no record of discussing surface scraping here. I did review the data and saw that only surface scraping was appropriate before I sent the prior email. I should have worded comment 3 more appropriately. Surface scraping at the SP3 location is approved. Thank you.

Geoffrey Leking  
Environmental Specialist  
NMOCD-Hobbs  
1625 N. French Drive  
Hobbs, NM 88240  
Office: (575) 393-6161 Ext. 113  
Cell: (575) 399-2990  
email: [geoffreyr.leking@state.nm.us](mailto:geoffreyr.leking@state.nm.us)

---

**From:** Cliff P. Brunson [<mailto:cbrunson@bbcinternational.com>]  
**Sent:** Monday, March 10, 2014 7:59 PM  
**To:** Leking, Geoffrey R, EMNRD  
**Cc:** [Chancey\\_Summers@oxy.com](mailto:Chancey_Summers@oxy.com); Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** Re: Additional Comments on MLMU #139, Gillully B Federal #18 and Warren McKee Unit #501

Geoff,

Here are my comments to your 3 points below:

1. We will collect a sample at 7.5 feet to verify TPH is below the RRAL.
2. The entire spill area will be excavated to 2 feet and lined as requested.
3. If you would please review the lab data associated with SP3 again. There is no need to excavate this area to 3.5 feet. We respectfully ask you to reconsider as you and I had discussed to only conduct surface scraping in this area. Please advise.

Thank you,

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  
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\*\*\*\*\*

---

**From:** Geoffrey Leking <[geoffreyr.leting@state.nm.us](mailto:geoffreyr.leting@state.nm.us)>  
**Date:** Monday, March 10, 2014 10:19 AM  
**To:** Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)>  
**Cc:** C J Summers <[Chancey\\_Summers@oxy.com](mailto:Chancey_Summers@oxy.com)>  
**Subject:** Additional Comments on MLMU #139, Gillully B Federal #18 and Warren McKee Unit #501

Cliff

- 1) MLMU #139 - Please collect a sample at 7.5' for TPH to verify that the concentration remained below the RRAL at this depth.
- 2) Gillully B Fed #18 - Please excavate to 2' and line @ SP1 as you are planning to do at SP2 and SP3. Please clarify if this is not possible.
- 3) Warren McKee Unit #501 - Please verify that you are excavating to 3.5' across the entire site as the figure displays only scraping at the SP3 area.

Thank you.

Geoffrey Leking  
Environmental Specialist  
NMOCD-Hobbs  
1625 N. French Drive  
Hobbs, NM 88240  
Office: (575) 393-6161 Ext. 113  
Cell: (575) 399-2990  
email: [geoffreyr.leting@state.nm.us](mailto:geoffreyr.leting@state.nm.us)

## Kathy Purvis

---

**From:** Van Curen, Jennifer <jvancure@blm.gov>  
**Sent:** Sunday, March 09, 2014 4:11 PM  
**To:** Cliff P. Brunson  
**Cc:** C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** Re: OXY-Gillully B Federal #18-Remediation Plan

Approved with the stipulation that documentation is made in operators well file, so that this clay liner is not penetrated when well is plugged.

JENNIFER E VAN CUREN  
ENVIRONMENTAL PROTECTION SPECIALIST  
DOI-BLM-CARLSBAD FIELD OFFICE  
320 E GREENE ST. CARLSBAD, NM 88220  
OFFICE- 575-234-5905  
CELL - 575-361-0042  
FAX - 575-234-5927

On Sat, Mar 8, 2014 at 5:43 PM, Cliff P. Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)> wrote:  
Jennifer,

This e-mail is to request the BLM's approval for the following remediation plan for the above referenced site. I have attached the materials that pertain to the site and the plan. This plan has already been approved by Geoff Leking of the NMOCD. Oxy will excavate to a depth of 1 foot in the area of SP1 and two feet across the rest of the leak area (SP2 and SP3) as shown on the diagram. The area of the spill represented by SP2 and SP3 will have a clay liner installed then the entire spill area will be backfilled with clean soil.

If you would please e-mail your concurrence with this remediation plan, 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](mailto:cbrunson@bbcinternational.com)

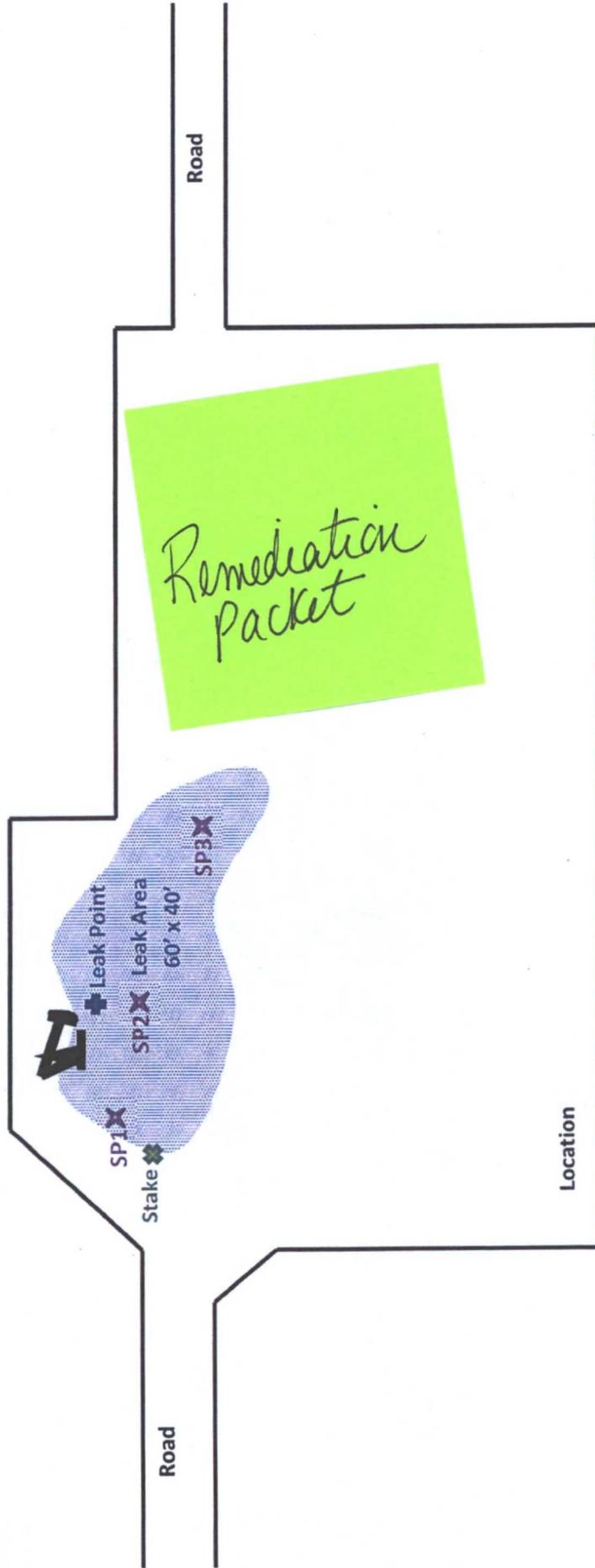
\*\*\*\*\*

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\*\*\*\*\*



Oxy  
Gillully B Federal #18



U/L A, Section 21, T20S, R37E  
660' FNL, 990' FEL  
Lea County, NM  
GPS at stake:  
N 32.56401° W 103.25117°  
API# 30-025-25865

<b>BBC International, Inc.</b>	
<b>Oxy</b>	
<b>Gillully B Federal #18</b>	
Date: 01/02/2014	DRWG by: K. Purvis
NOT TO SCALE	File: Oxy 2013



# Groundwater Plot

## Oxy Gillully B Federal #18

County  
Lea

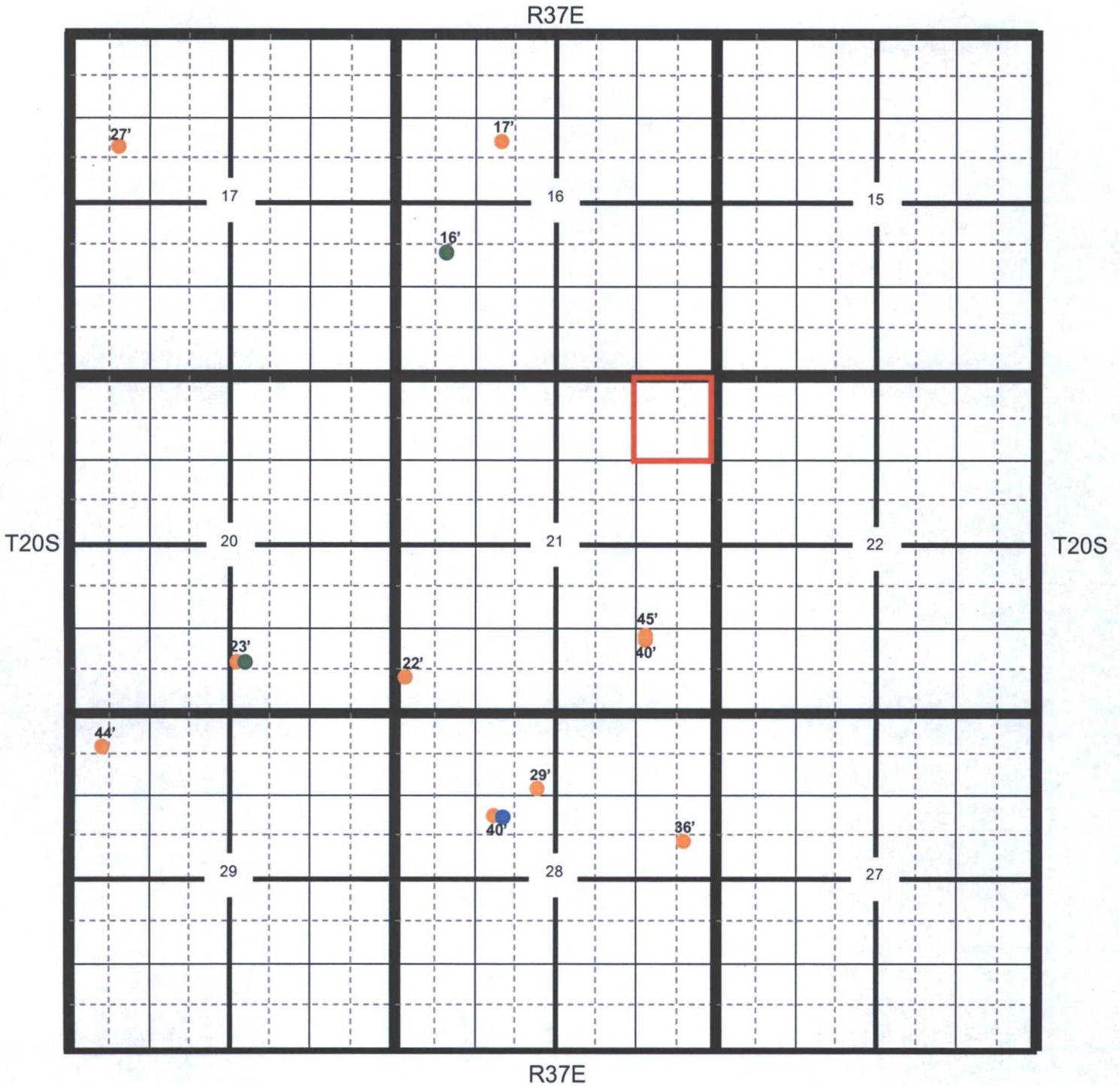
Unit Letter  
A

Section  
21

Township  
20S

Range  
37E

Trend Map <50'



⚙ Location

● OCD

● USGS

● SEO

● All Databases



Section Quarters

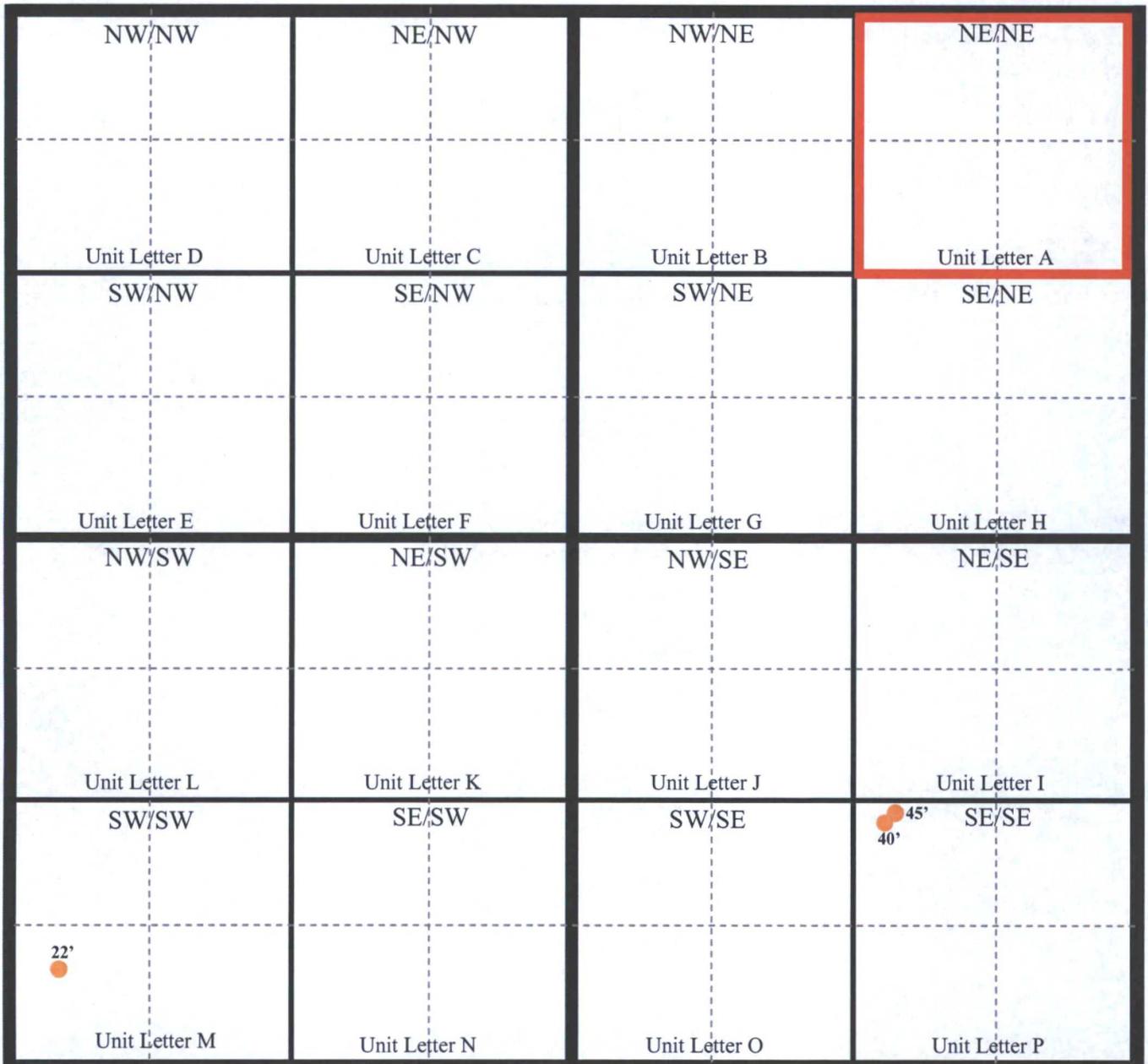
Oxy Gillully B Federal #18

County: Lea      Unit Letter: A      Section: 21      Township: 20S      Range: 37E

Trend Map <50'

1

2



3

4

Laboratory Analytical Results Summary  
Gillully B Fed #18

Analyte	Method	Sample	SP1 @ 1'	SP1 @ 2'	SP1 @ 4'	SP1 @ 6'	SP1 @ 7'
		Date	1/30/14	1/30/14	1/30/14	1/30/14	1/30/14
			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
<b>Chloride</b>	SM4500Cl-B		928	176	384	416	272

Analyte	Method	Sample	SP2 @ 1'	SP2 @ 2'	SP2 @ 4'	SP2 @ 6'	SP2 @ 8'
		Date	1/30/14	1/30/14	1/30/14	1/30/14	1/30/14
			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
<b>Chloride</b>	SM4500Cl-B		352	352	912	672	240

Analyte	Method	Sample	SP3 @ 1'	SP3 @ 2'	SP3 @ 4'	SP3 @ 5'
		Date	1/30/14	1/30/14	1/30/14	1/30/14
			mg/Kg	mg/Kg	mg/Kg	mg/Kg
<b>Chloride</b>	SM4500Cl-B		<16.0	32	928	<16.0



February 07, 2014

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

RE: GILLULLY B FED #18

Enclosed are the results of analyses for samples received by the laboratory on 01/31/14 16:20.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](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 "Celey D. Keene".

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:	01/31/2014	Sampling Date:	01/30/2014
Reported:	02/07/2014	Sampling Type:	Soil
Project Name:	GILLULLY B FED #18	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: SP 1 @ 1' (H400314-01)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	928	16.0	02/07/2014	ND	416	104	400	0.00		

**Sample ID: SP 1 @ 2' (H400314-02)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	176	16.0	02/07/2014	ND	416	104	400	0.00		

**Sample ID: SP 1 @ 4' (H400314-03)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	384	16.0	02/07/2014	ND	416	104	400	0.00		

**Sample ID: SP 1 @ 6' (H400314-04)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	416	16.0	02/07/2014	ND	416	104	400	0.00		

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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: 01/31/2014  
 Reported: 02/07/2014  
 Project Name: GILLULLY B FED #18  
 Project Number: NONE GIVEN  
 Project Location: NOT GIVEN

 Sampling Date: 01/30/2014  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 1 @ 7' (H400314-05)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	272	16.0	02/07/2014	ND	416	104	400	0.00		

**Sample ID: SP 2 @ 1' (H400314-06)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	352	16.0	02/07/2014	ND	416	104	400	0.00		

**Sample ID: SP 2 @ 2' (H400314-07)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	352	16.0	02/07/2014	ND	416	104	400	0.00		

**Sample ID: SP 2 @ 4' (H400314-08)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	912	16.0	02/07/2014	ND	416	104	400	0.00		

**Sample ID: SP 2 @ 6' (H400314-09)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	672	16.0	02/07/2014	ND	416	104	400	0.00		

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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: 01/31/2014  
 Reported: 02/07/2014  
 Project Name: GILLULLY B FED #18  
 Project Number: NONE GIVEN  
 Project Location: NOT GIVEN

 Sampling Date: 01/30/2014  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 2 @ 8' (H400314-10)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	240	16.0	02/07/2014	ND	416	104	400	0.00		

**Sample ID: SP 3 @ 1' (H400314-11)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	02/07/2014	ND	416	104	400	0.00		

**Sample ID: SP 3 @ 2' (H400314-12)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	02/07/2014	ND	416	104	400	0.00		

**Sample ID: SP 3 @ 4' (H400314-13)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	928	16.0	02/07/2014	ND	416	104	400	0.00		

**Sample ID: SP 3 @ 5' (H400314-14)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	02/07/2014	ND	416	104	400	0.00		

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



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

**CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

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Company Name: BBC International, Inc.		P.O. #:		ANALYSIS REQUEST												
Project Manager: Cliff Brunson		Company:														
Address: P.O. Box 805		Attn:														
City: Hobbs		Address: SAME														
State: NM Zip: 88241		City:														
Phone #: 575-397-6388		State:														
Fax #: 575-397-0397		Zip:														
Project #: _____		Project Owner: OXY														
Project Name: Gillully B FED # 18		Phone #:														
Project Location: _____		Fax #:														
Sampler Name: Gary Ray		MATRIX														
FOR LAB USE ONLY		PRESERV		SAMPLING												
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :	DATE	TIME	ANALYSIS	REQUEST
4400344	1 SP 1e 1'		1										1-30-14	000	✓	CHLORIDE
	2		1										1-30-14	035	✓	
	3		1										1-30-14	1015	✓	
	4		1										1-30-14	1045	✓	
	5		1										1-30-14	1100	✓	
	6	SP 2e 1'	1										1-30-14	1138	✓	
	7		1										1-30-14	1150	✓	
	8		1										1-30-14	1215	✓	
	9		1										1-30-14	1245	✓	
	10		1										1-30-14	1315	✓	

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Relinquished By: Gary Ray Date: 1-31-14 Time: 4:00 Received By: [Signature] Date: 1-31-14 Time: 4:10

Delivered By: [Signature] (Circled) Sample Condition: Cool Intact Yes [X] No [ ]

Sampler - UPS - Bus - Other: 4.70c

CHECKED BY: [Signature] (Initials)

REMARKS:

Phone Result:  Yes  No Add'l Phone #: \_\_\_\_\_

Fax Result:  Yes  No Add'l Fax #: \_\_\_\_\_

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476 #54



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**CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

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**BILL TO**

**ANALYSIS REQUEST**

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: SAME							
Phone #: 575-397-6388	Fax #: 575-397-0397	City:							
Project #:	Project Owner: OKY	State:							
Project Name: Gully 23 Feb # 18		Zip:							
Project Location:		Phone #:							
Sampler Name: GARY RAY		Fax #:							
FOR LAB USE ONLY									
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX	PRESERV.	SAMPLING	DATE	TIME	REMARKS
11	SP 30 1'		1	SOIL			1/30/14	145	CL-
12	30 2'		1	SOIL			1/30/14	200	
13	30 4'		1	SOIL			1/30/14	230	
14	30 5'		1	SOIL			1/30/14	240	

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Relinquished By: GARY RAY	Date: 1-31-14	Received By: Cliff Brunson	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No
Relinquished By: GARY RAY	Date: 1-31-14	Received By: Cliff Brunson	Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No
Relinquished By: GARY RAY	Date: 1-31-14	Received By: Cliff Brunson	Add'l Phone #: _____
Relinquished By: GARY RAY	Date: 1-31-14	Received By: Cliff Brunson	Add'l Fax #: _____
Delivered By: (Circle One) Sampler - UPS - Bus - Other: 4-70	Sample Condition Cool <input checked="" type="checkbox"/> Intact <input type="checkbox"/>	CHECKED BY: (Initials) [Signature]	REMARKS:

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476 #54