

Closure Report

Site Description

Site Name:	Bradley 13 Federal Battery
Company:	Oxy Permian Ltd.
Legal Description:	U/L F, Section 13, T25S, R29E
County:	Eddy County, NM
GPS Coordinates:	N 32.13175° W 103.94036°

Release Data

Date of Release:	11/11/2013
Type of Release:	Produced water
Source of Release:	Pump failure caused tank overflow
Volume of Release:	45 bbls
Volume Recovered:	30 bbls

Remediation Specifications

Remediation Parameters:	Excavate the entire leak site to a depth of 2 feet. Then, bacfill the site with clean soil.	
Remediation Activities:	09/30/2014 to 10/15/2014	
Plan Sent to OCD:	04/01/2014	Meeting between C. Brunson & M. Bratcher
OCD Approval of Plan:	04/01/2014	Verbal approval at meeting
Plan Sent to BLM:	01/06/2014	Email from Cliff Brunson to J. Van Curen
BLM Approval of Plan:	06/30/2014	Verbal approval from Jennifer Van Curen

Supporting Documentation

Initial C-141	Signed 11/25/2013
Final C-141	Signed 11/03/2014
Site Diagram	December 2013
Groundwater Plot	225'
TOPO Maps	December 2013
Lab Summary	01/23/2014, 03/14/2014, and 10/07/2014
Lab Analysis	01/23/2014, 03/14/2014, and 10/07/2014
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.

11/06/2014

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

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 August 8, 2011

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	Bradley 13 Federal Battery	Facility Type	Gathering
Surface Owner	BLM	Mineral Owner	API No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
F	13	25S	29E					Eddy County, NM

Latitude N 32.13175° Longitude W 103.94036°

NATURE OF RELEASE

Type of Release	Produced Water	Volume of Release	Volume Recovered
Source of Release	Pump failure caused tank overflow	45 bbls	30 bbls
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	Date and Hour of Occurrence	Date and Hour of Discovery
		11/11/13	
By Whom?	Chancey Summers	If YES, To Whom?	
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Mike Bratcher-NMOCD; Jennifer Van Curen- BLM	
		Date and Hour	11/12/13 @ 3:00 pm
		If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

Pump failure caused a tank to overflow and leak 45 bbls of produced water onto the ground. 30 bbls of produced water were recovered via vacuum truck and the pump was repaired/replaced.

Describe Area Affected and Cleanup Action Taken.*

The affected area is approximately 25' x 25' on location. Remediation will be completed in accordance with a remediation plan approved by NMOCD and the BLM.

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

Signature:	<u>OIL CONSERVATION DIVISION</u>		
Printed Name: 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: 11/25/13	Phone: (575) 397-8216		

* Attach Additional Sheets If Necessary

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

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 August 8, 2011

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	Bradley 13 Federal Battery	Facility Type	Gathering

Surface Owner	BLM	Mineral Owner		API No.	
---------------	-----	---------------	--	---------	--

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
F	13	25S	29E					Eddy County, NM

Latitude N 32.13175° Longitude W 103.94036°

NATURE OF RELEASE

Type of Release	Produced Water	Volume of Release	45 bbls	Volume Recovered	30 bbls
Source of Release	Pump failure caused tank overflow	Date and Hour of Occurrence	11/11/13	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; Jennifer Van Curen- BLM		
By Whom?	Chancey Summers	Date and Hour	11/12/13 @ 3:00 pm		
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.*

Pump failure caused a tank to overflow and leak 45 bbls of produced water onto the ground. 30 bbls of produced water were recovered via vacuum truck and the pump was repaired/replaced.

Describe Area Affected and Cleanup Action Taken.*

The affected area is approximately 25' x 25' on location. Remediation was completed in accordance with the remediation plan approved by Mike Bratcher of NMOCD and by Jennifer Van Curen of the BLM.

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

Signature: 	OIL CONSERVATION DIVISION		
Printed Name: Chancey Summers	Approved by Environmental Specialist:		
Title: HES Advisor	Approval Date:	Expiration Date:	
E-mail Address: <u>Chancey.Summers@oxy.com</u>	Conditions of Approval:		Attached <input type="checkbox"/>
Date: <u>11-3-14</u> Phone: (575) 397-8216			

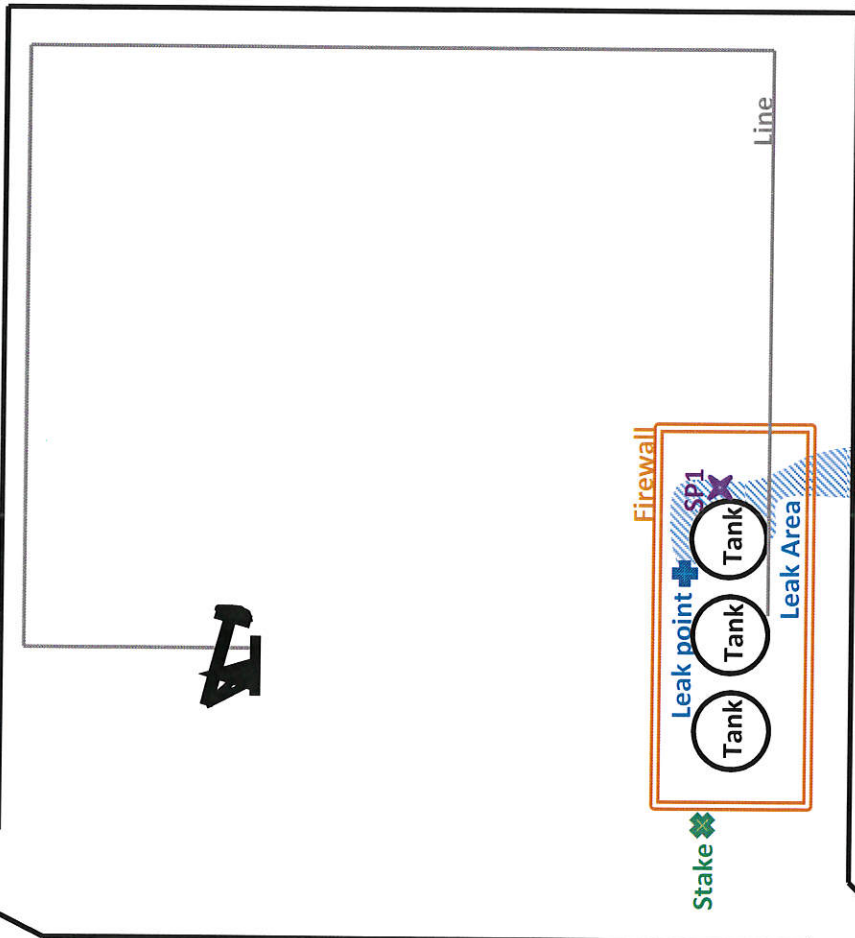
* Attach Additional Sheets If Necessary



U/L F, section 13, T25S, R29E
Eddy County, NM
GPS at Stake:
N 32.13169° W 103.94058°

Oxy
Bradley 13 Federal Battery

Road



Pasture

Road

BBC International, Inc.	
Oxy	
Bradley 13 Federal Battery	
Date: 12/06/2013	DRWG by: K. Purvis
NOT TO SCALE	File: Oxy 2013

Groundwater Plot

Oxy Bradley 13 Federal Battery

County
Eddy

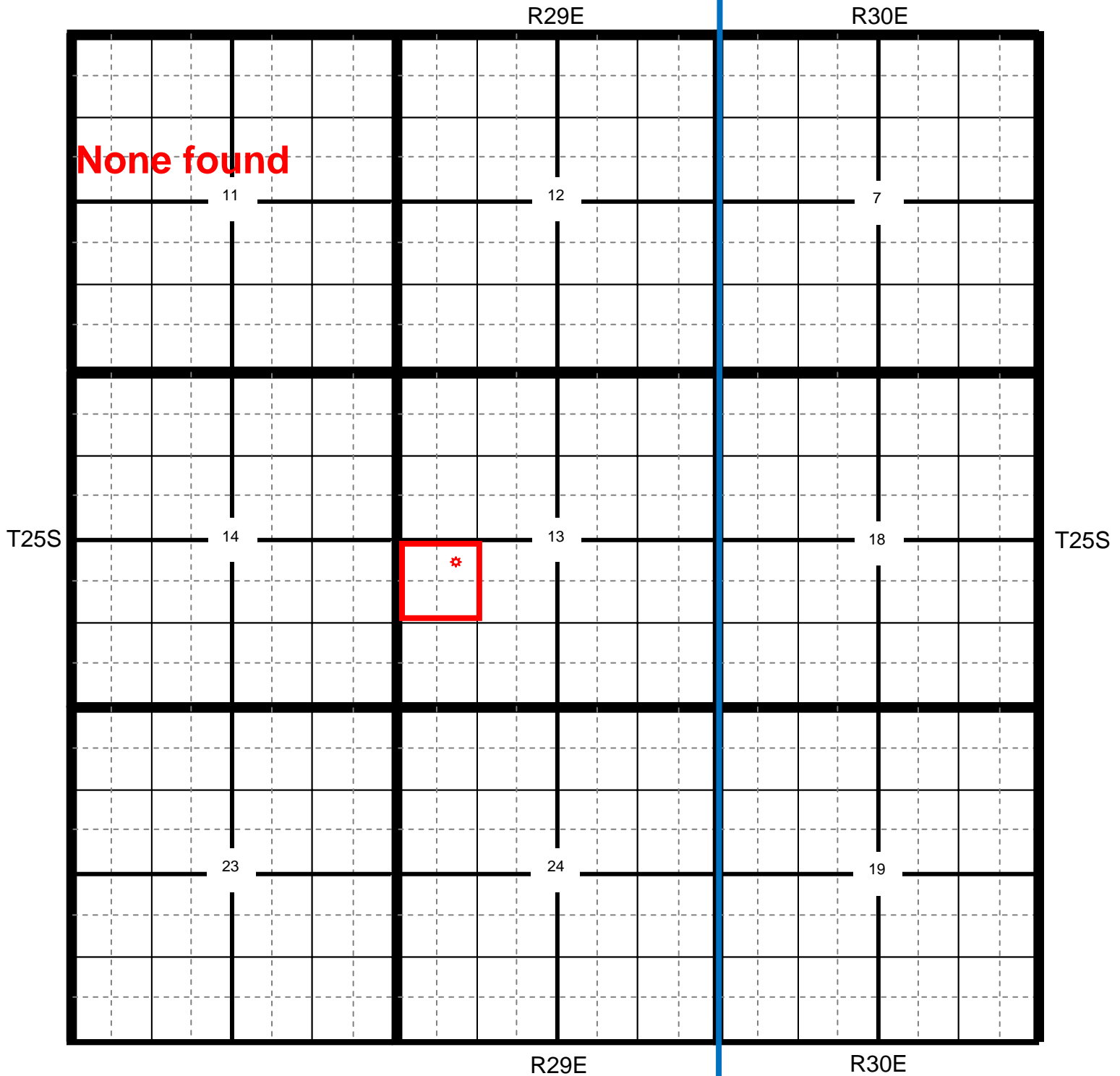
Unit Letter
F

Section
13

Township
25S

Range
29E

Trend Map 225'



⚙ Location

● OCD

● USGS

● SEO

● All Databases

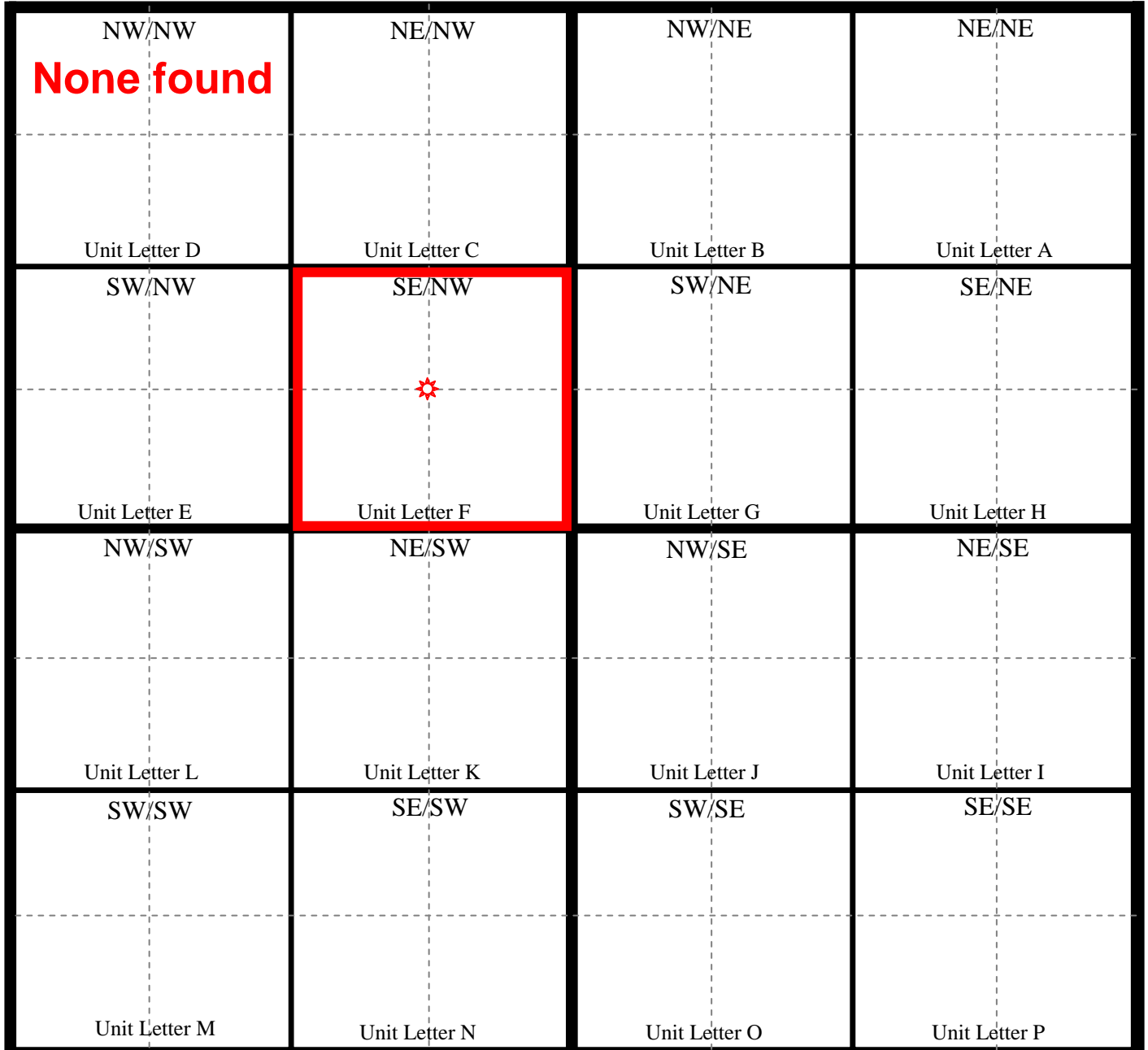
Oxy Bradley 13 Federal Battery

County Eddy Unit Letter F Section 13 Township 25S Range 29E

Trend Map 225'

1

2

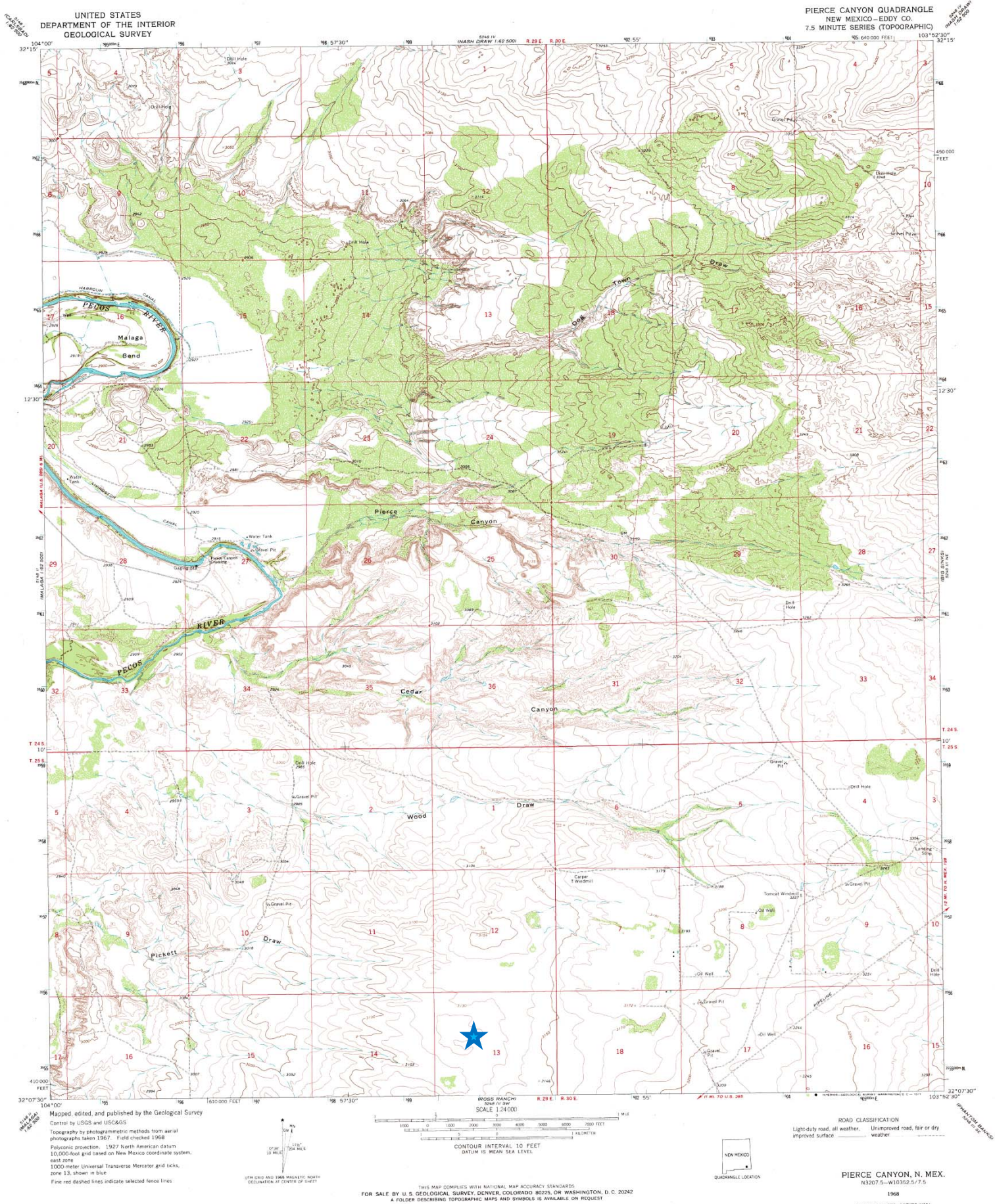


3

4

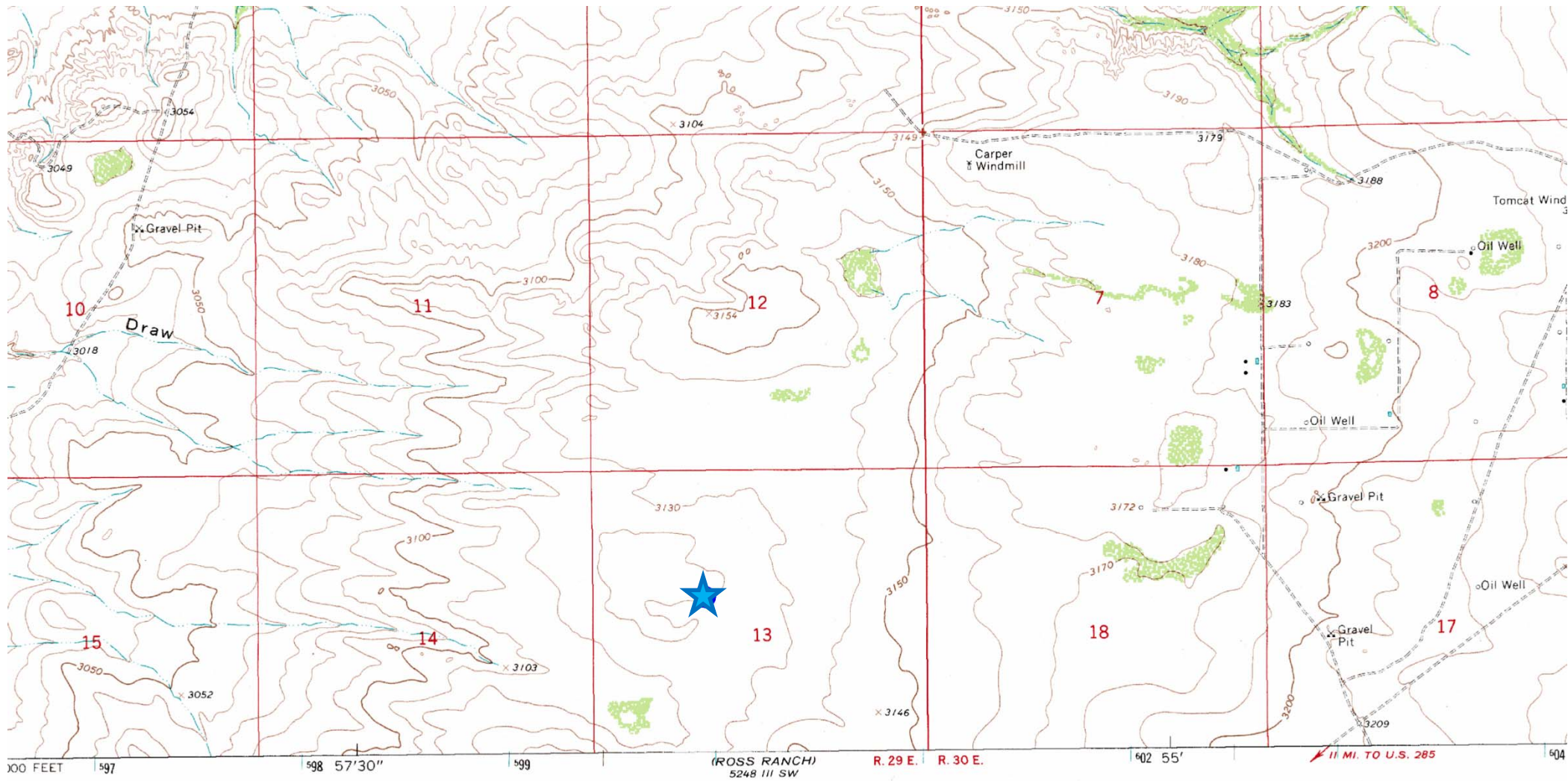
Oxy

Bradley 13 Federal Battery



Oxy

Bradley 13 Federal Battery



Laboratory Analytical Results Summary
Bradley 13 Fed #1

		Sample	SP1 @ 1'	SP1 @ 2'	SP1 @ 4'	SP1 @ 6'	SP1 @ 7'
Analyte	Method	Date	1/23/14	1/23/14	1/23/14	1/23/14	1/23/14
			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.200	n/a	n/a	n/a	n/a
Toluene	BTEX 8021B		2.54	n/a	n/a	n/a	n/a
Ethylbenzene	BTEX 8021B		8.18	n/a	n/a	n/a	n/a
Total Xylenes	BTEX 8021B		17.1	n/a	n/a	n/a	n/a
Total BTEX	BTEX 8021B		27.8	n/a	n/a	n/a	n/a
Chloride	SM4500Cl-B		1550	624	992	1170	<16.0
GRO	TPH 8015M		580	n/a	n/a	n/a	n/a
DRO	TPH 8015M		5090	n/a	n/a	n/a	n/a

		Sample	SP2 @ 1'	SP2 @ 2'
Analyte	Method	Date	1/23/14	1/23/14
			mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.500	n/a
Toluene	BTEX 8021B		<0.500	n/a
Ethylbenzene	BTEX 8021B		4.33	n/a
Total Xylenes	BTEX 8021B		15.2	n/a
Total BTEX	BTEX 8021B		19.5	n/a
Chloride	SM4500Cl-B		<16.0	<16.0
GRO	TPH 8015M		795	n/a
DRO	TPH 8015M		9700	n/a

		Sample	SP1 @ 6'	SP2 @ 3'
Analyte	Method	Date	3/14/14	3/14/14
			mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.050	<0.050
Toluene	BTEX 8021B		<0.050	<0.050
Ethylbenzene	BTEX 8021B		<0.050	<0.050
Total Xylenes	BTEX 8021B		<0.150	<0.150
Total BTEX	BTEX 8021B		<0.300	<0.300
Chloride	SM4500Cl-B		n/a	n/a
GRO	TPH 8015M		<10.0	<10.0
DRO	TPH 8015M		<10.0	<10.0

**Laboratory Analytical Results Summary
Bradley 13 Federal Battery**

<u>Confirmation</u>		Sample	Pit @ 2'	Wellhead @ 2'
Analyte	Method	Date	10/7/14	10/7/14
			mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.050	<0.050
Toluene	BTEX 8021B		<0.050	<0.050
Ethylbenzene	BTEX 8021B		<0.050	<0.050
Total Xylenes	BTEX 8021B		<0.150	<0.150
Total BTEX	BTEX 8021B		<0.300	<0.300
Chloride	SM4500Cl-B		<16.0	<16.0
GRO	TPH 8015M		<10.0	<10.0
DRO	TPH 8015M		<10.0	<10.0



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

January 31, 2014

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: BRADLEY 13 FED #1

Enclosed are the results of analyses for samples received by the laboratory on 01/27/14 9:00.

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.

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". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

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: 01/27/2014
 Reported: 01/31/2014
 Project Name: BRADLEY 13 FED #1
 Project Number: NONE GIVEN
 Project Location: 285

 Sampling Date: 01/23/2014
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Kathy Perez

Sample ID: SP 1 @ 1' (H400248-01)

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.200	0.200	01/30/2014	ND	2.39	120	2.00	0.434	
Toluene*	2.54	0.200	01/30/2014	ND	2.35	117	2.00	0.0933	
Ethylbenzene*	8.18	0.200	01/30/2014	ND	2.32	116	2.00	0.108	
Total Xylenes*	17.1	0.600	01/30/2014	ND	6.88	115	6.00	1.47	
Total BTX	27.8	1.20	01/30/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 104 % 89.4-126

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1550	16.0	01/30/2014	ND	400	100	400	8.33	

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	580	50.0	01/30/2014	ND	198	98.9	200	4.82		
DRO >C10-C28	5090	50.0	01/30/2014	ND	198	99.0	200	2.28		

Surrogate: 1-Chlorooctane 140 % 65.2-140

Surrogate: 1-Chlorooctadecane 174 % 63.6-154

Sample ID: SP 1 @ 2' (H400248-02)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	624	16.0	01/30/2014	ND	400	100	400	8.33	

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: 01/27/2014
Reported: 01/31/2014
Project Name: BRADLEY 13 FED #1
Project Number: NONE GIVEN
Project Location: 285

Sampling Date: 01/23/2014
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Kathy Perez

Sample ID: SP 1 @ 4' (H400248-03)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	992	16.0	01/30/2014	ND	400	100	400	8.33	

Sample ID: SP 1 @ 6' (H400248-04)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1170	16.0	01/30/2014	ND	400	100	400	8.33	

Sample ID: SP 1 @ 7' (H400248-05)

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	01/30/2014	ND	400	100	400	8.33		

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: 01/27/2014
Reported: 01/31/2014
Project Name: BRADLEY 13 FED #1
Project Number: NONE GIVEN
Project Location: 285

Sampling Date: 01/23/2014
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Kathy Perez

Sample ID: SP 2 @ 1' (H400248-06)

BTX 8021B		mg/kg		Analyzed By: MS				S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.500	0.500	01/30/2014	ND	2.39	120	2.00	0.434	
Toluene*	<0.500	0.500	01/30/2014	ND	2.35	117	2.00	0.0933	
Ethylbenzene*	4.33	0.500	01/30/2014	ND	2.32	116	2.00	0.108	
Total Xylenes*	15.2	1.50	01/30/2014	ND	6.88	115	6.00	1.47	
Total BTX	19.5	3.00	01/30/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 196 % 89.4-126

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	01/30/2014	ND	400	100	400	8.33	

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	795	200	01/29/2014	ND	198	98.9	200	4.82	
DRO >C10-C28	9700	200	01/29/2014	ND	198	99.0	200	2.28	

Surrogate: 1-Chlorooctane 138 % 65.2-140

Surrogate: 1-Chlorooctadecane 249 % 63.6-154

Sample ID: SP 1 @ 2' (H400248-07)

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	01/30/2014	ND	400	100	400	8.33	

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

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

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



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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]



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

March 25, 2014

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: BRADLEY 13 FED #1

Enclosed are the results of analyses for samples received by the laboratory on 03/17/14 16:50.

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.

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". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

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: 03/17/2014
Reported: 03/25/2014
Project Name: BRADLEY 13 FED #1
Project Number: NONE GIVEN
Project Location: ORLA

Sampling Date: 03/14/2014
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: SP 1 @ 6 (H400806-01)

BTEX 8021B			mg/kg		Analyzed By: MS				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	03/19/2014	ND	2.01	101	2.00	0.775	
Toluene*	<0.050	0.050	03/19/2014	ND	1.92	96.0	2.00	0.201	
Ethylbenzene*	<0.050	0.050	03/19/2014	ND	1.88	94.1	2.00	0.709	
Total Xylenes*	<0.150	0.150	03/19/2014	ND	5.43	90.5	6.00	0.115	
Total BTEX	<0.300	0.300	03/19/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 103 % 89.4-126

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	03/20/2014	ND	197	98.7	200	0.404	
DRO >C10-C28	<10.0	10.0	03/20/2014	ND	192	95.9	200	0.866	

Surrogate: 1-Chlorooctane 103 % 65.2-140

Surrogate: 1-Chlorooctadecane 101 % 63.6-154

Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

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

Received: 03/17/2014
Reported: 03/25/2014
Project Name: BRADLEY 13 FED #1
Project Number: NONE GIVEN
Project Location: ORLA

Sampling Date: 03/14/2014
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: SP 2 @ 3 (H400806-02)

BTEx 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	03/19/2014	ND	2.01	101	2.00	0.775	
Toluene*	<0.050	0.050	03/19/2014	ND	1.92	96.0	2.00	0.201	
Ethylbenzene*	<0.050	0.050	03/19/2014	ND	1.88	94.1	2.00	0.709	
Total Xylenes*	<0.150	0.150	03/19/2014	ND	5.43	90.5	6.00	0.115	
Total BTEX	<0.300	0.300	03/19/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 103 % 89.4-126

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	03/20/2014	ND	197	98.7	200	0.404	
DRO >C10-C28	<10.0	10.0	03/20/2014	ND	192	95.9	200	0.866	

Surrogate: 1-Chlorooctane 84.1 % 65.2-140

Surrogate: 1-Chlorooctadecane 87.9 % 63.6-154

Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



Celey D. Keene, Lab Director/Quality Manager

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

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



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

October 10, 2014

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: BRADLEY 13 FEDERAL BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 10/09/14 9:30.

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.

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". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

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

Received:	10/09/2014	Sampling Date:	10/07/2014
Reported:	10/10/2014	Sampling Type:	Soil
Project Name:	BRADLEY 13 FEDERAL BATTERY	Sampling Condition:	Cool & Intact
Project Number:	OXY	Sample Received By:	Jodi Henson
Project Location:	LONGHORN ROAD		

Sample ID: CONFIRMATION PIT @ 2' (H403089-01)

BTX 8021B		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/09/2014	ND	1.67	83.4	2.00	11.5	
Toluene*	<0.050	0.050	10/09/2014	ND	1.64	82.0	2.00	8.86	
Ethylbenzene*	<0.050	0.050	10/09/2014	ND	1.55	77.3	2.00	10.8	
Total Xylenes*	<0.150	0.150	10/09/2014	ND	4.57	76.2	6.00	11.0	
Total BTX	<0.300	0.300	10/09/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 101 % 61-154

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	10/09/2014	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	10/09/2014	ND	176	87.8	200	1.23	
DRO >C10-C28	<10.0	10.0	10/09/2014	ND	178	89.0	200	0.304	

Surrogate: 1-Chlorooctane 97.6 % 47.2-157

Surrogate: 1-Chlorooctadecane 103 % 52.1-176

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: 10/09/2014
Reported: 10/10/2014
Project Name: BRADLEY 13 FEDERAL BATTERY
Project Number: OXY
Project Location: LONGHORN ROAD

Sampling Date: 10/07/2014
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: CONFIRMATION WELLHEAD @ 2' (H403089-02)

BTEx 8021B		mg/kg		Analyzed By: ms						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	10/09/2014	ND	1.67	83.4	2.00	11.5		
Toluene*	<0.050	0.050	10/09/2014	ND	1.64	82.0	2.00	8.86		
Ethylbenzene*	<0.050	0.050	10/09/2014	ND	1.55	77.3	2.00	10.8		
Total Xylenes*	<0.150	0.150	10/09/2014	ND	4.57	76.2	6.00	11.0		
Total BTEx	<0.300	0.300	10/09/2014	ND						

Surrogate: 4-Bromofluorobenzene (PID) 102 % 61-154

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	10/09/2014	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	10/09/2014	ND	176	87.8	200	1.23	
DRO >C10-C28	<10.0	10.0	10/09/2014	ND	178	89.0	200	0.304	

Surrogate: 1-Chlorooctane 97.1 % 47.2-157

Surrogate: 1-Chlorooctadecane 104 % 52.1-176

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

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

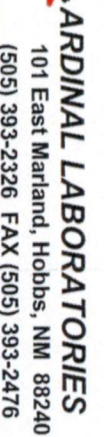
Cardinal Laboratories

*=Accredited Analyte

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



181

Page 5 of 5

Jennifer Gilkey

From: Cliff P. Brunson <cbrunson@bbcinternational.com>
Sent: Sunday, April 06, 2014 4:50 PM
To: Mike Bratcher
Cc: C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: OXY-Bradley 13 Federal Battery-Remediation Plan
Attachments: Remediation Packet, Bradley 13 Fed Btry.pdf

Mike,

This e-mail is to confirm our conversation on April 1, 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 2 feet in the entire leak area that is depicted on the attached site diagram. Then the site will then 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

Confidentiality Notice: This electronic transmission (and any attached documents) is intended only for the person(s) to whom it is addressed and may contain information that is privileged, confidential, or otherwise protected from disclosure. If you have received this transmission in error, please immediately notify the sender by e-mail or by telephone call to (575) 397-6388 for handling instructions. Any disclosure or distribution of the contents of this transmission by anyone other than the named recipient(s) is strictly prohibited.

Jennifer Gilkey

From: Cliff P. Brunson <cbrunson@bbcinternational.com>
Sent: Sunday, April 06, 2014 4:51 PM
To: Jennifer Van Curen
Cc: C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: OXY-Bradley 13 Federal Battery-Remediation Plan
Attachments: Remediation Packet, Bradley 13 Fed Btry.pdf

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 Mike Bratcher of the NMOCD. Oxy will excavate to a depth of 2 feet in the entire leak area that is depicted on the attached site diagram. Then the site will then 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

Confidentiality Notice: This electronic transmission (and any attached documents) is intended only for the person(s) to whom it is addressed and may contain information that is privileged, confidential, or otherwise protected from disclosure. If you have received this transmission in error, please immediately notify the sender by e-mail or by telephone call to (575) 397-6388 for handling instructions. Any disclosure or distribution of the contents of this transmission by anyone other than the named recipient(s) is strictly prohibited.
