

# Closure Report

## Site Description

Site Name:	Lost Tank 3 Federal #21
Company:	Oxy Permian Ltd.
Legal Description:	U/L E, Section 3, T22S, R31E
County:	Eddy County, NM
GPS Coordinates:	N 32.42086° W 103.77331°

## Release Data

Date of Release:	11/04/2014
Type of Release:	Oil and produced water
Source of Release:	Excess pressure caused the stuffing box packing to blow out
Volume of Release:	5 bbls oil, 5 bbls produced water
Volume Recovered:	0 bbls

## Remediation Specifications

Remediation Parameters:	Surface scrape the area around SP3, Excavate the remainder of the leak to a depth of 2.5 feet. Backfill the site with clean soil.
Remediation Activities:	05/11/2015 to 05/14/2015

Plan Sent to OCD:	04/08/2015	Email from Cliff Brunson to Mike Bratcher
OCD Approval of Plan:	04/09/2015	Email from Mike Bratcher to Cliff Brunson
Plan Sent to BLM:	04/09/2015	Email from Cliff Brunson to Sol Hughes
BLM Approval of Plan:	04/13/2015	Email from Sol Hughes to Cliff Brunson

## Supporting Documentation

Initial C-141	Signed 11/13/2014
Final C-141	Signed 05/20/2015
Site Diagram	November 2014
Groundwater Plot	150'
TOPO Maps	November 2014
Lab Summary	03/02/2015
Lab Analysis	03/02/2015
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.

06/24/2015

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	Lost Tank 3 Federal #21	Facility Type	well
Surface Owner	Mineral Owner	API No.	30-015-37920

#### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
E	3	22S	31E					Eddy County, NM

Latitude N 32.42078° Longitude W 103.77330°

#### NATURE OF RELEASE

Type of Release	Oil and produced water	Volume of Release	5 bbls oil, 5 bbls produced water	Volume Recovered	0 bbls
Source of Release	Excess pressure caused the stuffing box packing on the wellhead to blow out	Date and Hour of Occurrence	11/04/2014	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, Sol Hughes- BLM		
By Whom?	Kathy Purvis, BBC International	Date and Hour	11/05/2014 @ 3:29 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.\*

Excess pressure caused the stuffing box packing on the wellhead to blow out 5 bbls of oil and 5 bbls of produced water onto the ground. No fluids were recovered and the stuffing box packing was replaced.

Describe Area Affected and Cleanup Action Taken.\*

The affected area is approximately 30' x 60' 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 Advisor	Approval Date:	Expiration Date:	
E-mail Address: Chancey.Summers@oxy.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 11-13-14 Phone: (575) 397-8216			

\* Attach Additional Sheets If Necessary

District I  
1625 N. French Dr., Hobbs, NM 88240  
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State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
1220 South St. Francis Dr.  
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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	Christopher Jones
Address	1502 W. Commerce Dr.; Carlsbad, NM	Telephone No.	(575) 628-4121
Facility Name	Lost Tank 3 Federal #21	Facility Type	well
Surface Owner	Mineral Owner	API No.	30-015-37920

#### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
E	3	22S	31E					Eddy County, NM

Latitude N 32.42078° Longitude W 103.77330°

#### NATURE OF RELEASE

Type of Release	Oil and produced water	Volume of Release	5 bbls oil, 5 bbls produced water	Volume Recovered	0 bbls
Source of Release	Excess pressure caused the stuffing box packing on the wellhead to blow out	Date and Hour of Occurrence	11/04/2014	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, Sol Hughes- BLM		
By Whom?	Kathy Purvis, BBC International	Date and Hour	11/05/2014 @ 3:29 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.\*

Excess pressure caused the stuffing box packing on the wellhead to blow out 5 bbls of oil and 5 bbls of produced water onto the ground. No fluids were recovered and the stuffing box packing was replaced.

Describe Area Affected and Cleanup Action Taken.\*

The affected area is approximately 30' x 60' on location. Remediation was completed in accordance with the remediation plan approved by Mike Bratcher of NMOCD via email on 04/09/2014 and approved by Sol Hughes of the BLM via email on 04/13/2014.

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 pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: <b>Chris Jones</b> <small>Digitally signed by Chris Jones DN: cn=Chris Jones, o, ou, email=ckjones88@yahoo.com , c=US Date: 2015.05.15 10:43:38 -05'00'</small>	<b>OIL CONSERVATION DIVISION</b>		
Printed Name: Christopher Jones	Approved by Environmental Specialist:		
Title: HES Specialist	Approval Date:	Expiration Date:	
E-mail Address: Christopher.Jones@oxy.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: <b>5/20/15</b>	Phone: (575) 628-4121		

\* Attach Additional Sheets If Necessary



Oxy

Lost Tank 3 Federal #21

Pasture

Location

U/L E, Section 3, T22S, R31E  
Eddy County, NM  
N 32.42086° W 103.77331°  
API# 30-015-37920



Pumpjacks

Surface  
scrape

SP3

43' x 4'

Stake

2.5' excavation

Pasture

Leak Area

SP1

84' x 34'

30' x 3'

27' x 17'

SP2

25' x 3'

Road

Pasture

BBC International, Inc.

Oxy

Lost Tank 3 Federal #21

Date: 11/12/14

DRWG by: K. Purvis

NOT TO SCALE

File: Oxy 2014

# Groundwater Plot

## Oxy Lost Tank 3 Federal #21

County  
Eddy

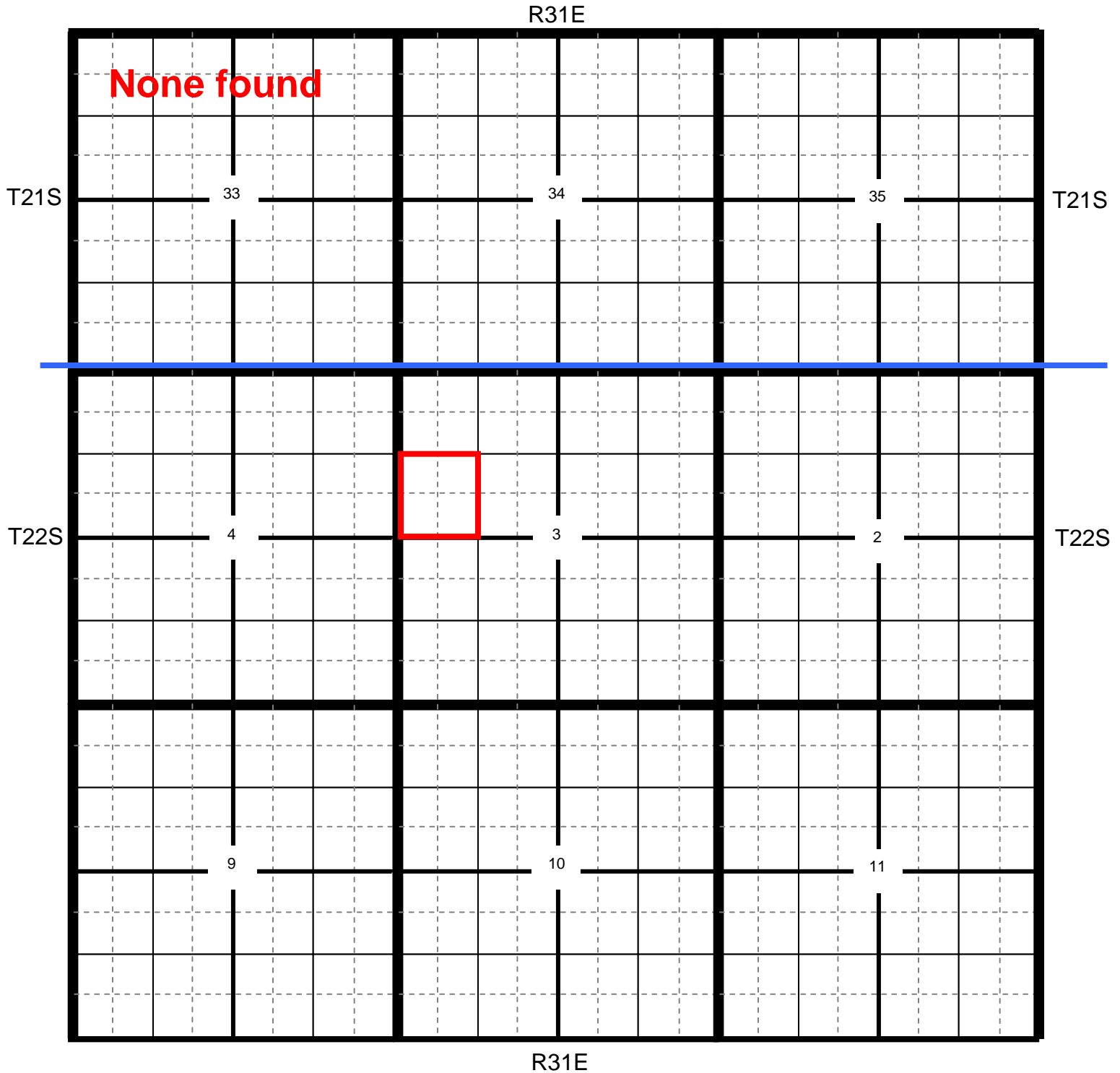
Unit Letter  
E

Section  
3

Township  
22S

Range  
31E

Trend Map 150'



📍 Location

● OCD

● USGS

● SEO

● All Databases

## Oxy Lost Tank 3 Federal #21

County Eddy      Unit Letter E      Section 3      Township 22S      Range 31E

Trend Map 150'

1

2

NW/NW <b>None found</b>	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	NE/SE
Unit Letter L	Unit Letter K	Unit Letter J	Unit Letter I
SW/SW	SE/SW	SW/SE	SE/SE
Unit Letter M	Unit Letter N	Unit Letter O	Unit Letter P

3

4











**Laboratory Analytical Results Summary  
Lost Tank 3 Federal #21**

		Sample	SP1 @ 1'	SP1 @ 3'	SP1 @ 5'
Analyte	Method	Date	3/2/15	3/2/15	3/2/15
			mg/Kg	mg/Kg	mg/Kg
<b>Benzene</b>	BTEX 8021B		<0.050	<0.050	<0.050
<b>Toluene</b>	BTEX 8021B		<0.050	<0.050	<0.050
<b>Ethylbenzene</b>	BTEX 8021B		<0.050	<0.050	<0.050
<b>Total Xylenes</b>	BTEX 8021B		<0.150	<0.150	<0.150
<b>Total BTEX</b>	BTEX 8021B		<0.300	<0.300	<0.300
<b>Chloride</b>	SM4500Cl-B		<b>4000</b>	<b>800</b>	<16.0
<b>GRO</b>	TPH 8015M		<10.0	<10.0	<10.0
<b>DRO</b>	TPH 8015M		<10.0	<10.0	<10.0

		Sample	SP2 @ 1'	SP2 @ 3'	SP2 @ 5'
Analyte	Method	Date	3/2/15	3/2/15	3/2/15
			mg/Kg	mg/Kg	mg/Kg
<b>Benzene</b>	BTEX 8021B		<0.050	<0.050	<0.050
<b>Toluene</b>	BTEX 8021B		<0.050	<0.050	<0.050
<b>Ethylbenzene</b>	BTEX 8021B		<b>0.085</b>	<0.050	<0.050
<b>Total Xylenes</b>	BTEX 8021B		<b>0.953</b>	<0.150	<0.150
<b>Total BTEX</b>	BTEX 8021B		<b>1.04</b>	<0.300	<0.300
<b>Chloride</b>	SM4500Cl-B		<b>11300</b>	<b>704</b>	<16.0
<b>GRO</b>	TPH 8015M		<b>94.5</b>	<10.0	<10.0
<b>DRO</b>	TPH 8015M		<b>6560</b>	<b>11.6</b>	<10.0

		Sample	SP3 @ 1'	SP3 @ 2'
Analyte	Method	Date	3/2/15	3/2/15
			mg/Kg	mg/Kg
<b>Benzene</b>	BTEX 8021B		<0.050	<0.050
<b>Toluene</b>	BTEX 8021B		<0.050	<0.050
<b>Ethylbenzene</b>	BTEX 8021B		<0.050	<0.050
<b>Total Xylenes</b>	BTEX 8021B		<0.150	<0.150
<b>Total BTEX</b>	BTEX 8021B		<0.300	<0.300
<b>Chloride</b>	SM4500Cl-B		<b>336</b>	<16.0
<b>GRO</b>	TPH 8015M		<10.0	<10.0
<b>DRO</b>	TPH 8015M		<10.0	<10.0



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

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March 09, 2015

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: LOST TANK 3 FEDERAL #21

Enclosed are the results of analyses for samples received by the laboratory on 03/04/15 8:35.

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". 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:	03/04/2015	Sampling Date:	03/02/2015
Reported:	03/09/2015	Sampling Type:	Soil
Project Name:	LOST TANK 3 FEDERAL #21	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Amanda Ponce
Project Location:	WIPP		

**Sample ID: SP 1 @ 1' (H500598-01)**

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	03/06/2015	ND	2.09	105	2.00	6.24	
Toluene*	<0.050	0.050	03/06/2015	ND	1.93	96.3	2.00	5.90	
Ethylbenzene*	<0.050	0.050	03/06/2015	ND	2.26	113	2.00	5.11	
Total Xylenes*	<0.150	0.150	03/06/2015	ND	6.07	101	6.00	6.11	
Total BTX	<0.300	0.300	03/06/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 114 % 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	4000	16.0	03/04/2015	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	03/04/2015	ND	177	88.4	200	0.00508	
DRO >C10-C28	<10.0	10.0	03/04/2015	ND	180	89.9	200	3.68	

Surrogate: 1-Chlorooctane 79.4 % 47.2-157

Surrogate: 1-Chlorooctadecane 84.6 % 52.1-176

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:	03/04/2015	Sampling Date:	03/02/2015
Reported:	03/09/2015	Sampling Type:	Soil
Project Name:	LOST TANK 3 FEDERAL #21	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Amanda Ponce
Project Location:	WIPP		

**Sample ID: SP 1 @ 3' (H500598-02)**

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	03/06/2015	ND	2.09	105	2.00	6.24	
Toluene*	<0.050	0.050	03/06/2015	ND	1.93	96.3	2.00	5.90	
Ethylbenzene*	<0.050	0.050	03/06/2015	ND	2.26	113	2.00	5.11	
Total Xylenes*	<0.150	0.150	03/06/2015	ND	6.07	101	6.00	6.11	
Total BTEx	<0.300	0.300	03/06/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 114 % 61-154

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	800	16.0	03/04/2015	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	03/04/2015	ND	177	88.4	200	0.00508	
DRO >C10-C28	<10.0	10.0	03/04/2015	ND	180	89.9	200	3.68	

Surrogate: 1-Chlorooctane 78.0 % 47.2-157

Surrogate: 1-Chlorooctadecane 84.8 % 52.1-176

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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

Received:	03/04/2015	Sampling Date:	03/02/2015
Reported:	03/09/2015	Sampling Type:	Soil
Project Name:	LOST TANK 3 FEDERAL #21	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Amanda Ponce
Project Location:	WIPP		

**Sample ID: SP 1 @ 5' (H500598-03)**

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	03/06/2015	ND	2.09	105	2.00	6.24	
Toluene*	<0.050	0.050	03/06/2015	ND	1.93	96.3	2.00	5.90	
Ethylbenzene*	<0.050	0.050	03/06/2015	ND	2.26	113	2.00	5.11	
Total Xylenes*	<0.150	0.150	03/06/2015	ND	6.07	101	6.00	6.11	
Total BTX	<0.300	0.300	03/06/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 114 % 61-154

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	03/04/2015	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	03/04/2015	ND	177	88.4	200	0.00508	
DRO >C10-C28	<10.0	10.0	03/04/2015	ND	180	89.9	200	3.68	

Surrogate: 1-Chlorooctane 77.1 % 47.2-157

Surrogate: 1-Chlorooctadecane 82.4 % 52.1-176

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Analytical Results For:**

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

Received:	03/04/2015	Sampling Date:	03/02/2015
Reported:	03/09/2015	Sampling Type:	Soil
Project Name:	LOST TANK 3 FEDERAL #21	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Amanda Ponce
Project Location:	WIPP		

**Sample ID: SP 2 @ 1' (H500598-04)**

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	03/06/2015	ND	2.09	105	2.00	6.24	
Toluene*	<0.050	0.050	03/06/2015	ND	1.93	96.3	2.00	5.90	
Ethylbenzene*	0.085	0.050	03/06/2015	ND	2.26	113	2.00	5.11	
Total Xylenes*	0.953	0.150	03/06/2015	ND	6.07	101	6.00	6.11	
Total BTEX	1.04	0.300	03/06/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 113 % 61-154

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	11300	16.0	03/04/2015	ND	400	100	400	3.92	

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	94.5	50.0	03/04/2015	ND	177	88.4	200	0.00508	
DRO >C10-C28	6560	50.0	03/04/2015	ND	180	89.9	200	3.68	

Surrogate: 1-Chlorooctane 98.5 % 47.2-157

Surrogate: 1-Chlorooctadecane 195 % 52.1-176

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



**Analytical Results For:**

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Cliff Brunson  
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Hobbs NM, 88241  
Fax To: (575) 397-0397

Received:	03/04/2015	Sampling Date:	03/02/2015
Reported:	03/09/2015	Sampling Type:	Soil
Project Name:	LOST TANK 3 FEDERAL #21	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Amanda Ponce
Project Location:	WIPP		

**Sample ID: SP 2 @ 3' (H500598-05)**

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	03/06/2015	ND	2.09	105	2.00	6.24	
Toluene*	<0.050	0.050	03/06/2015	ND	1.93	96.3	2.00	5.90	
Ethylbenzene*	<0.050	0.050	03/06/2015	ND	2.26	113	2.00	5.11	
Total Xylenes*	<0.150	0.150	03/06/2015	ND	6.07	101	6.00	6.11	
Total BTEx	<0.300	0.300	03/06/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 115 % 61-154

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	704	16.0	03/04/2015	ND	400	100	400	3.92	

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	03/04/2015	ND	177	88.4	200	0.00508	
DRO >C10-C28	11.6	10.0	03/04/2015	ND	180	89.9	200	3.68	

Surrogate: 1-Chlorooctane 80.8 % 47.2-157

Surrogate: 1-Chlorooctadecane 88.7 % 52.1-176

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:	03/04/2015	Sampling Date:	03/02/2015
Reported:	03/09/2015	Sampling Type:	Soil
Project Name:	LOST TANK 3 FEDERAL #21	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Amanda Ponce
Project Location:	WIPP		

**Sample ID: SP 2 @ 5' (H500598-06)**

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	03/06/2015	ND	2.09	105	2.00	6.24	
Toluene*	<0.050	0.050	03/06/2015	ND	1.93	96.3	2.00	5.90	
Ethylbenzene*	<0.050	0.050	03/06/2015	ND	2.26	113	2.00	5.11	
Total Xylenes*	<0.150	0.150	03/06/2015	ND	6.07	101	6.00	6.11	
Total BTEx	<0.300	0.300	03/06/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 114 % 61-154

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	03/04/2015	ND	400	100	400	3.92	

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	03/04/2015	ND	177	88.4	200	0.00508	
DRO >C10-C28	<10.0	10.0	03/04/2015	ND	180	89.9	200	3.68	

Surrogate: 1-Chlorooctane 81.8 % 47.2-157

Surrogate: 1-Chlorooctadecane 86.6 % 52.1-176

Cardinal Laboratories

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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:	03/04/2015	Sampling Date:	03/02/2015
Reported:	03/09/2015	Sampling Type:	Soil
Project Name:	LOST TANK 3 FEDERAL #21	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Amanda Ponce
Project Location:	WIPP		

**Sample ID: SP 3 @ 1' (H500598-07)**

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	03/06/2015	ND	2.09	105	2.00	6.24		
Toluene*	<0.050	0.050	03/06/2015	ND	1.93	96.3	2.00	5.90		
Ethylbenzene*	<0.050	0.050	03/06/2015	ND	2.26	113	2.00	5.11		
Total Xylenes*	<0.150	0.150	03/06/2015	ND	6.07	101	6.00	6.11		
Total BTX	<0.300	0.300	03/06/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 114 % 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	336	16.0	03/04/2015	ND	400	100	400	3.92		

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	03/05/2015	ND	191	95.6	200	0.733		
DRO >C10-C28	<10.0	10.0	03/05/2015	ND	205	103	200	4.15		

Surrogate: 1-Chlorooctane 88.2 % 47.2-157

Surrogate: 1-Chlorooctadecane 94.4 % 52.1-176

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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:	03/04/2015	Sampling Date:	03/02/2015
Reported:	03/09/2015	Sampling Type:	Soil
Project Name:	LOST TANK 3 FEDERAL #21	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Amanda Ponce
Project Location:	WIPP		

**Sample ID: SP 3 @ 2' (H500598-08)**

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	03/06/2015	ND	1.74	87.0	2.00	9.22	
Toluene*	<0.050	0.050	03/06/2015	ND	1.97	98.5	2.00	6.92	
Ethylbenzene*	<0.050	0.050	03/06/2015	ND	1.97	98.6	2.00	6.14	
Total Xylenes*	<0.150	0.150	03/06/2015	ND	6.26	104	6.00	5.05	
Total BTEx	<0.300	0.300	03/06/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 103 % 61-154

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	03/04/2015	ND	400	100	400	3.92		

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	03/05/2015	ND	191	95.6	200	0.733	
DRO >C10-C28	<10.0	10.0	03/05/2015	ND	205	103	200	4.15	

Surrogate: 1-Chlorooctane 78.8 % 47.2-157

Surrogate: 1-Chlorooctadecane 86.0 % 52.1-176

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\*=Accredited Analyte

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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.
- 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



## **Kathy Purvis**

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**From:** Hughes, Solomon <shughes@blm.gov>  
**Sent:** Monday, April 13, 2015 12:09 PM  
**To:** Cliff Brunson  
**Cc:** Chris Jones; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** Re: FW: OXY-Lost Tank 3 Federal #21 - Remediation Plan

This plan is approved as written with the following conditions:

BLM approval of this proposal does not relieve the operator of liability, should their operations fail to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, any other aspects of the natural environment, human health, or if the location does not properly reclaim. In such an event that location does not re-vegetate, or future issues with contaminants are encountered, the operator will be asked to address the location 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.

Bests,

Sol

### **Sol Hughes**

Environmental Protection Division  
Bureau of Land Management  
620 E. Greene St  
Carlsbad, NM

Office: 575.234.5951  
Cell: 575.499.3378

On Thu, Apr 9, 2015 at 6:51 PM, Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)> wrote:

Sol,

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. His email follows this message.

If you will review the diagram on the attachment, it depicts the remediation plan and the areas and depths of the excavations. After the soil is excavated, the site 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

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E-Mail: [cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)

\*\*\*\*\*

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**From:** Bratcher, Mike, EMNRD [mailto:[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)]

**Sent:** Thursday, April 9, 2015 8:37 AM

**To:** Cliff Brunson

**Subject:** RE: OXY-Lost Tank 3 Federal #21 - Remediation Plan

RE: OXY USA \* Lost Tank 3 Fed 21 \* 30-015-37920 \* E3-22s-31e \* Eddy County, NM

NMOCD Tracking Number: **2RP-2604** \* Date of release: 11/4/14

Cliff,

Your proposal for remediation of the above referenced release is approved. Federal sites will require like approval from BLM. Please notify the District 2 office once remedial operations have been scheduled.

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, and for notification, please contact me or Heather Patterson.  
[Heather.Patterson@state.nm.us](mailto:Heather.Patterson@state.nm.us)

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 Brunson [<mailto:cbrunson@bbcinternational.com>]

Sent: Wednesday, April 08, 2015 7:06 PM

To: Bratcher, Mike, EMNRD

Subject: OXY-Lost Tank 3 Federal #21 - Remediation Plan



Mike,

Please find attached the remediation plan that we discussed this afternoon. Please review and let me know if this meets with your approval. The first page is the site diagram and I have marked the areas of excavation and back dragging. The data summary table, lab data, and initial C-141 follow the diagram.

Give me a call and let me know if you have any questions.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS

President

BBC International, Inc.

World-Wide Environmental Specialists

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