

**OXY USA, Inc.  
Gaines 22 Fed 1 CTB  
Delineation Report and Work Plan**

**Section 22, T22S, R29E  
Eddy County, New Mexico**

**January 29, 2015**



**Prepared for:**

**OXY USA, Inc.  
1017 W Stanolind Road  
Hobbs, New Mexico 88240**

**By:**

***Safety & Environmental Solutions, Inc.  
703 East Clinton Street  
Hobbs, New Mexico 88240  
(575) 397-0510***

## TABLE OF CONTENTS

<b>I. COMPANY CONTACTS.....</b>	<b>1</b>
<b>II. BACKGROUND.....</b>	<b>1</b>
<b>III. SURFACE AND GROUND WATER.....</b>	<b>1</b>
<b>IV. CHARACTERIZATION.....</b>	<b>1</b>
<b>V. WORK PERFORMED.....</b>	<b>1</b>
<b>VI. ACTION PLAN.....</b>	<b>2</b>
<b>VII. FIGURES &amp; APPENDICES .....</b>	<b>2</b>
Figure 1 – Vicinity Map.....	3
Figure 2 – Site Plan .....	5
Appendix A – Analytical Results .....	9
Appendix B – C-141 .....	18
Appendix C – Site Photographs.....	19

## I. Company Contacts

Representative	Company	Telephone	E-mail
Christopher Jones	OXY USA, INC.	575-499-3337	Christopher_jones@oxy.com
Bob Allen	SESI	575-397-0510	ballen@sesi-nm.com

## II. Background

Safety and Environmental Solutions, Inc. (SESI) was engaged by OXY USA, INC to perform site assessment of a release area at the Gaines 22 Federal 1 CTB located in Section 22 of Township 22 South, Range 29 East, Eddy County, New Mexico.

According to the C-141 the cause of release was well down and circulating pump was running causing fluid to go to heater treater so valve relieved.

## III. Surface and Ground Water

The nearest groundwater of record is approximately 1.0 mile northeast of the site. The New Mexico Office of State Engineer record is in Section 14 Range 29 East and Township 22 South. The reported depth was 56 feet below ground surface (BGS).

## IV. Characterization

The target cleanup levels are determined using the *Guidelines for Remediation of Leaks, Spills and Releases* published by the NMOCD (August 13, 1993). Based on the ranking criteria presented below, the applicable Recommended Remediation Action Levels (RRAL) are 10 parts per million (ppm) Benzene, 50 ppm combined benzene, toluene, ethylbenzene, and total xylenes (BTEX), and 1,000 ppm Total Petroleum Hydrocarbons (TPH).

Depth to Ground Water:			
(Vertical distance from contaminants to seasonal high water elevation of groundwater)	Less than 50 feet	20 points	
	50 feet to 99 feet	10 points	X
	>100 feet	0 points	
Wellhead Protection Area:			
(Less than 200 feet from a private domestic water source; or less than 1000 feet from all other water sources)	Yes	20 points	
	No	0 points	X
Distance to Surface Water:			
(Horizontal distance to perennial lakes, ponds, rivers, streams, creeks, irrigation canals and ditches)	Less than 200 feet	20 points	
	200 feet to 1000 feet	10 points	
	>1000 feet	0 points	X
RANKING SCORE (TOTAL POINTS)			10

## V. Work Performed

On January 09, 2014, Safety & Environmental Solutions, Inc. was onsite to determine vertical extent of contamination. Samples TT-1 was taken at a depth of 3', TT-2 was taken at a depth of 2', TT-3 was taken at a depth of 1.5' and TT-1 was taken at a depth of 2'. All samples were properly packaged, preserved and transported to the Laboratory, Hobbs New Mexico and analyzed for Benzene, Toluene, Ethylbenzene, Xylenes, Total

BTEX and Chloride (Cl<sup>-</sup>) (Method SM4500Cl-B). The results of the analysis are presented in the table below:

Sample Date 12/18/2014	Sample ID	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	Total BTEX
Depth	Method					
TT-1 at 3'	BTEX 8021B	<0.050	<0.050	<0.050	<0.150	<0.300
TT-2 at 2'	BTEX 8021B	<0.050	<0.050	<0.050	<0.150	<0.300
TT-3 at 1.5"	BTEX 8021B	<0.050	<0.050	<0.050	<0.150	<0.300
TT-1 at 2'	BTEX 8021B	<0.050	<0.050	<0.050	<0.150	<0.300

Sample Date 05/03/2014	Sample ID	Chloride (Cl)	Sample ID	GRO (C <sub>6</sub> -C <sub>10</sub> ) (mg/kg)	DRO (>C <sub>10</sub> -C <sub>28</sub> ) (mg/kg)
Depth	Method		Method		
TT-1 at 3'	SM4500Cl-B	3160	TPH 8015M	<10.0	<10.0
TT-2 at 2'	SM4500Cl-B	176	TPH 8015M	<10.0	<10.0
TT-3 at 1.5"	SM4500Cl-B	80	TPH 8015M	<10.0	<10.0
TT-1 at 2'	SM4500Cl-B	4080	TPH 8015M	<10.0	20.2

## VI. Action Plan

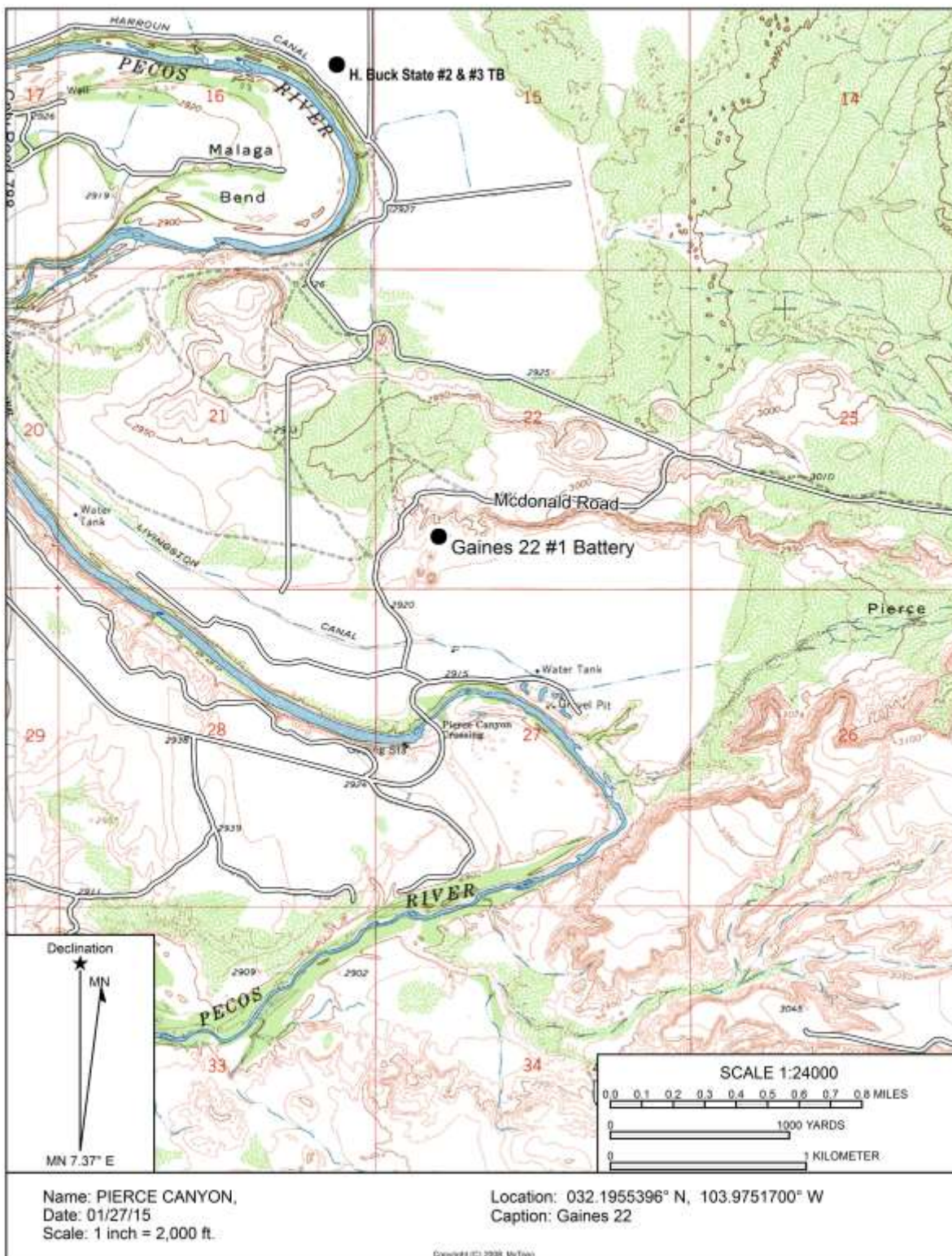
Due to the results listed above the following action plan is proposed:

1. Excavate remove all contaminated soil above 500PPM transport to an approved NMOCD facility for disposal.
2. The excavated area will be backfilled with native soil and returned to natural grade.
3. No further action is necessary.

## VII. Figures & Appendices

Figure 1 – Vicinity Map  
 Figure 2 – Site Plan  
 Figure 3 – NMOCD Trend Map  
 Appendix A – Analytical Results  
 Appendix B – C-141

**Figure 1**  
**Vicinity Map**



**Figure 2**  
**Site Plan**





**Gaines 22 Fed Com 1 Battery**



# **Appendix A**

## **Analytical Results**



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

January 14, 2015

Bob Allen

Safety & Environmental Solutions

703 East Clinton

Hobbs, NM 88240

RE: GAINES 22 FED #1

Enclosed are the results of analyses for samples received by the laboratory on 01/09/15 15:00.

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/gal/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/gal/lab_accred_certif.html).

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Halooacetic 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



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

**Analytical Results For:**

Safety & Environmental Solutions  
Bob Allen  
703 East Clinton  
Hobbs NM, 88240  
Fax To: (575) 393-4388

Received: 01/09/2015  
Reported: 01/14/2015  
Project Name: GAINES 22 FED #1  
Project Number: OXY-14-033  
Project Location: EDDY COUNTY, NM

Sampling Date: 01/09/2015  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

Sample ID: TT-1 3' BGS (H500074-01)

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	01/12/2015	ND	1.59	79.4	2.00	11.9	
Toluene*	<0.050	0.050	01/12/2015	ND	1.57	78.5	2.00	10.5	
Ethylbenzene*	<0.050	0.050	01/12/2015	ND	1.50	74.9	2.00	12.7	
Total Xylenes*	<0.150	0.150	01/12/2015	ND	4.50	74.9	6.00	13.4	
Total BTX	<0.300	0.300	01/12/2015	ND					

Surrogate: 4-Bromofluorobenzene (PIL) 95.1 % 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	3160	16.0	01/13/2015	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
GR0 C6-C10	<10.0	10.0	01/12/2015	ND	191	95.7	200	0.00	
DR0 >C10-C28	<10.0	10.0	01/12/2015	ND	194	97.2	200	0.00	

Surrogate: 1-Chlorooctane 87.7 % 47.2-157

Surrogate: 1-Chlorooctadecane 88.1 % 52.1-176

Cardinal Laboratories

\*=Accredited Analyte

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*Celley D. Keene*

Celley D. Keene, Lab Director/Quality Manager

Page 2 of 7

**Analytical Results For:**

 Safety & Environmental Solutions  
 Bob Allen  
 703 East Clinton  
 Hobbs NM, 88240  
 Fax To: (575) 393-4388

 Received: 01/09/2015  
 Reported: 01/14/2015  
 Project Name: GAINES 22 FED #1  
 Project Number: OXY-14-033  
 Project Location: EDDY COUNTY, NM

 Sampling Date: 01/09/2015  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

Sample ID: TT-2 2' BGS (H500074-02)

BTEX 80218		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	01/12/2015	ND	1.59	79.4	2.00	11.9		
Toluene*	<0.050	0.050	01/12/2015	ND	1.57	78.5	2.00	10.5		
Ethylbenzene*	<0.050	0.050	01/12/2015	ND	1.50	74.9	2.00	12.7		
Total Xylenes*	<0.150	0.150	01/12/2015	ND	4.50	74.9	6.00	13.4		
Total BTEX	<0.300	0.300	01/12/2015	ND						

Surrogate: 4-Bromofluorobenzene (PHE) 94.3 % 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	176	16.0	01/13/2015	ND	416	104	400	0.00	
TPH 8015M		mg/kg		Analyzed By: MS					

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	01/12/2015	ND	191	95.7	200	0.00	
DRO >C10-C28	<10.0	10.0	01/12/2015	ND	194	97.2	200	0.00	

Surrogate: 1-Chlorooctane 81.6 % 47.2-157

Surrogate: 1-Chlorooctadecane 85.9 % 52.1-176

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\* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Analytical Results For:**

Safety & Environmental Solutions  
Bob Allen  
703 East Clinton  
Hobbs NM, 88240  
Fax To: (575) 393-4388

Received: 01/09/2015  
Reported: 01/14/2015  
Project Name: GAINES 22 FED #1  
Project Number: OXY-14-033  
Project Location: EDDY COUNTY, NM

Sampling Date: 01/09/2015  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: TT-3 1.5' BGS (H500074-03)**

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	01/12/2015	ND	1.59	79.4	2.00	11.9	
Toluene*	<0.050	0.050	01/12/2015	ND	1.57	78.5	2.00	10.5	
Ethylbenzene*	<0.050	0.050	01/12/2015	ND	1.50	74.9	2.00	12.7	
Total Xylenes*	<0.150	0.150	01/12/2015	ND	4.50	74.9	6.00	13.4	
Total BTEX	<0.300	0.300	01/12/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 96.0 % 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	80.0	16.0	01/13/2015	ND	416	104	400	0.00	
TPH 8015M		mg/kg		Analyzed By: MS					

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	01/12/2015	ND	191	95.7	200	0.00	
DRO >C10-C28	<10.0	10.0	01/12/2015	ND	194	97.2	200	0.00	

Surrogate: 1-Chlorooctane 86.5 % 47.2-157

Surrogate: 1-Chlorooctadecane 92.4 % 52.1-176

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager





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

**Analytical Results For:**

Safety & Environmental Solutions  
Bob Allen  
703 East Clinton  
Hobbs NM, 88240  
Fax To: (575) 393-4388

Received: 01/09/2015  
Reported: 01/14/2015  
Project Name: GAINES 22 FED #1  
Project Number: OXY-14-033  
Project Location: EDDY COUNTY, NM

Sampling Date: 01/09/2015  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

Sample ID: TT-1 2' BGS (H500074-04)

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	01/12/2015	ND	1.59	79.4	2.00	11.9	
Toluene*	<0.050	0.050	01/12/2015	ND	1.57	78.5	2.00	10.5	
Ethylbenzene*	<0.050	0.050	01/12/2015	ND	1.50	74.9	2.00	12.7	
Total Xylenes*	<0.150	0.150	01/12/2015	ND	4.50	74.9	6.00	13.4	
Total BTX	<0.300	0.300	01/12/2015	ND					

Surrogate: 4-Bromofluorobenzene (PIL) 95.8 % 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	4080	16.0	01/13/2015	ND	416	104	400	0.00	
TPH 8015M		mg/kg		Analyzed By: MS					

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	01/12/2015	ND	191	95.7	200	0.00	
DRO >C10-C28	20.2	10.0	01/12/2015	ND	194	97.2	200	0.00	

Surrogate: 1-Chlorooctane 86.6 % 47.2-157

Surrogate: 1-Chlorooctadecane 95.9 % 52.1-176

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\*=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 SM4500C-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 Maryland, Hobbs, NM 88240  
(505) 393-2326 Fax (505) 393-2478

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page 7 of 7

Company Name: Safety & Environmental Solutions, Inc.

Project Manager: Bob Allen

Address: 703 East Clinton

City: Hobbs State: NM Zip: 88240

Phone #: 575-397-0510 Fax #: 575-393-4388

Project #: 004-14-033 Project Owner: OXY

Project Name: 4400s 22 700 #1

Project Location: EDOY Co.

Sample Name: 5000 2000

Lab I.D. Sample I.D.

GRAB OR (C)OMP.

CONTAINERS

GROUNDWATER

WASTEWATER

SOIL

SIL

SLUDGE

OTHER:

ACID/BASE:

ICE / COOL

OTHER:

DATE

TIME

TPH (8015)

BTX

Chlorides

DELIVERED BY: (Circle One)

Carrier - UPS - Bus - Other:

Temp. 5.42

Sample Condition

Good

Pres

No

Check

Signature

Signature

Signature

Signature

Signature

Signature

1 Cardinal cannot accept verbal changes. Please fax written changes to 575-393-2478.

## **Appendix B**

### **C-141**

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	Contact: Christopher Jones
Address: 1502 W Commerce Dr.,	Telephone No. 575-499-3337
Facility Name: Gaines 22 Fed 1 CTB	Facility Type: Battery

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

**LOCATION OF RELEASE**

Unit Letter	Section: 22	Township: 22S	Range: 29E	Feet from the 820	North/South Line South	Feet from the 590	East/West Line West	County Eddy
-------------	-------------	---------------	------------	-------------------	------------------------	-------------------	---------------------	-------------

Latitude \_\_\_\_\_ Longitude \_\_\_\_\_

**NATURE OF RELEASE**

Type of Release: Oil	Volume of Release: 150BBLS	Volume Recovered: 60BBLS
Source of Release: Heater	Date and Hour of Occurrence: 12/18/2014 7:00	Date and Hour of Discovery: 12/18/2014 7:30AM
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Terry Bratcher	
By Whom? Jorge Calleros	Date and Hour 12/18/2014 8:30AM	
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.\*

Well is down and circulating pump was running causing fluid to go to heater trester so valve relieved.

Describe Area Affected and Cleanup Action Taken.\*

Safety & Environmental Solutions, Inc. will delineate the spill area and submit an appropriate work plan.

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

Signature: <b>Chris Jones</b> <small>Digitally signed by Chris Jones DN: cn=Chris Jones, o=Oxy, email=chris.jones@oxy.com, c=US Date: 2014.12.18 12:29:52 -0500</small>	<b>OIL CONSERVATION DIVISION</b>	
Printed Name Christopher Jones:	Approved by Environmental Specialist:	
Title:	Approval Date:	Expiration Date:
E-mail Address: Christopher_jones@oxy.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 12/19/2014 Phone: 575-499-3337		

\* Attach Additional Sheets If Necessary



## **Appendix C**

### **Site Photographs**



Heater looking West (Photo # 1)



Inside berm North looking West (Photo # 2)



Inside South side of berm looking West (Photo # 3)



South side of berm looking West (Photo # 4)





Outside berm looking West (Photo # 5)



Overspray area looking Southwest (Photo # 6)



Overspray area looking Southwest (Photo # 7)



Berm breech Southeast side looking North (Photo # 8)





Inside berm looking North (Photo # 9)



Inside berm looking North (Photo # 10)





Outside staining looking North (Photo # 11)



Inside South side of berm looking East (Photo # 12)





Inside North side of berm looking East (Photo # 13)



Inside West side of berm looking South(Photo # 14)



Inside East side of berm looking South (Photo # 15)



Berm Northwest corner looking West (Photo # 16)





Overspray area looking West (Photo # 17)



Berm Southeast corner looking West (Photo # 18)





Location Sign (Photo # 19)



Battery looking South (Photo # 20)