# **Closure Report**

Site Description					
Site Name:	Sarah State Com #1 O Battery				
Company:	Oxy Permian Ltd.				
Legal Description:	U/L O, Section 10, T19S, R29E				
County:	Eddy County, NM				
GPS Coordinates:	N 32.66947° W 104.06097°				

Release Data					
Date of Release:	12/31/2015				
Type of Release:	Produced water				
Source of Release:	Load line struck by backhoe				
Volume of Release:	70 bbls				
Volume Recovered:	0 bbls				

	Remediation Specifications
Remediation Parameters:	Excavate the entire spill area to a depth of 6 inches. Backfill the site with clean soil.
Remediation Activities:	07/07/2016 to 07/11/2016

Plan Sent to OCD:	03/14/2016	Email from Cliff Brunson to Mike Bratcher
OCD Approval of Plan:	03/17/2016	Email from Mike Bratcher to Cliff Brunson
Plan Sent to BLM:	n/a	n/a
BLM Approval of Plan:	n/a	n/a

Supporting Documentation					
Initial C-141	Signed 01/07/2016				
Final C-141	Signed 07/14/2016				
Site Diagram	January 2016				
Groundwater Plot	125'-150'				
TOPO Maps	January 2016				
Lab Summary	02/11/2016				
Lab Analysis	02/11/2016				
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. 07/20/2016

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

Revised August 8, 2011

Form C-141

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.

			Kele	ease Notific	catio	n and Co	rrective A	ction				
						<b>OPERA</b>	Initia	I Report		Final Repor		
Name of Co		Oxy Permia					Casey Summers	🗵				Timal Repor
		ive, Midland				Telephone No. (575) 513-8289						
Facility Nar	ne Sara	h State Com	#1 O Ba	ttery		Facility Typ	e Gathering					
Surface Ow	ner Stat	e		Mineral C	)wner			Al	PI No.	30-015-3	14693	
				LOCA	ATIO	N OF REI	LEASE					
Unit Letter	Section	Township	Range	Feet from the	North	/South Line	Feet from the	East/West I	Line	County		
0	10	198	29E							Eddy		
			]	Latitude N 32.0	66947	Longitu	de <u>W 104.0609</u>	7°		200)		
	-			NAT	URE	OF RELI	EASE					
Type of Rele		uced water					Release 70 bbls				0 bbls	
		l line struck b	y backhoe			Date and H 12/31/2015	our of Occurrenc	e Date	e and I	Hour of Dis	scovery	f
Was Immedia	ate Notice (		Yes 🗵	No Not Re	equired	If YES, To Mike Brate	Whom?					III.
By Whom?	Cliff Brun	ison @ BBC I				Date and H	lour 01/04/2016	in the aftern	100n			
Was a Water		ched?					lume Impacting t					
7.0 13.1			Yes 🗵			<u></u>						
If a Watercot	irse was Im	pacted, Descr	ibe Fully.	ĸ								
Describe Cou	so of Brobl	em and Reme	dial Assis	- T-1 *								
A backhoe strepaired/repla	ruck a load	line while cle	aring snov	v causing 70 bbls	of proc	luced water to	leak onto the grou	ınd. No fluid	ds were	e recovered	l and th	e line was
				(X)								
Describe Are	a Affected :	and Cleanup A	Action Tal	ken.*								
The affected	area is appr	oximately 35'	x 30' on	location inside the	e berm.	Remediation	will be completed	l in accordan	ce witl	h an approv	ved rem	nediation plan
from NMOC												
I hereby certi	fy that the i	nformation gi	ven above	is true and comp	lete to	the best of my	knowledge and u	nderstand tha	at pursi	uant to NM	OCD r	ules and
public health	or the envi	are required to	o report ai	id/or file certain r	elease i	notifications ar	nd perform correctarked as "Final Re	tive actions f	or rele	ases which	may e	ndanger
should their c	perations h	ave failed to a	adequately	investigate and re	emedia	te contaminati	on that pose a thre	eat to ground	water.	surface wa	ater hu	ıman health
or the enviror	iment. In a	ddition, NMC	CD accep	tance of a C-141	report o	does not reliev	e the operator of r	esponsibility	for co	mpliance v	with an	y other
rederal, state,	or local lav	ws and/or regu	ilations.				OIL COM	TED VATE	IONI	DIVIOI		
	-	1			12		OIL CONS	<u>SERVAI</u>	<u>IUN</u>	DIAIZIO	N	
Signature:	\mathrew \tag{\tau}											
Printed Name: Casey Summers					Approved by	Environmental Sp	pecialist:					
Title: NM E	Environmen	tal Advisor				Approval Dat	e:	Expir	ation [	Date:		
E-mail Addre	ss: Case	y_Summers@	0xv.com			Conditions of	Approval					
1_	1					Conditions 01	Approvat.			Attached	1 🔲	
Date: Carrier Addition			Phone	(575) 513-828	19							
Attach Addil	лопат элес	eis II mecess	arv									

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

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

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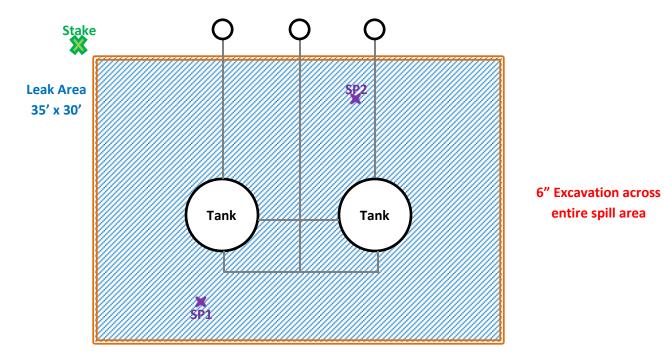
### Release Notification and Corrective Action **OPERATOR** Initial Report ☐ Final Report Name of Company Oxy Permian Ltd. Contact Casey Summers Address 6 Desta Drive, Midland, TX 79705 Telephone No. (575) 513-8289 Facility Name Sarah State Com #1 O Battery Facility Type Gathering Surface Owner State Mineral Owner API No. 30-015-34693 LOCATION OF RELEASE Unit Letter Section Township Range Feet from the North/South Line Feet from the East/West Line County 10 198 29E Eddy Latitude N 32.66947° Longitude W 104.06097° NATURE OF RELEASE Type of Release Produced water Volume of Release 70 bbls Volume Recovered 0 bbls Source of Release Load line struck by backhoe Date and Hour of Occurrence Date and Hour of Discovery 12/31/2015 Was Immediate Notice Given? If YES, To Whom? ☐ Yes ☒ No ☐ Not Required Mike Bratcher- NMOCD By Whom? Cliff Brunson @ BBC International Inc. Date and Hour 01/04/2016 in the afternoon Was a Watercourse Reached? If YES, Volume Impacting the Watercourse. ☐ Yes ☒ No If a Watercourse was Impacted, Describe Fully.\* Describe Cause of Problem and Remedial Action Taken.\* A backhoe struck a load line while clearing snow causing 70 bbls of produced water to leak onto the ground. No fluids were recovered and the line was repaired/replaced. Describe Area Affected and Cleanup Action Taken.\* The affected area is approximately 35' x 30' on location inside the berm. Remediation was completed in accordance with the remediation plan approved by Mike Bratcher of NMOCD via email on 03/17/2016. 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. IA 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: Approved by Environmental Specialist: Printed Name: Casey Summers Title: NM Environmental Advisor Approval Date: **Expiration Date:** E-mail Address: Casey\_Summers@oxy.com Conditions of Approval: Attached 7-14-16

Phone: (575) 513-8289

<sup>\*</sup> Attach Additional Sheets If Necessary



# Оху Sarah State Com #1 O Battery



U/L O Section 10, T19S, R29E

Eddy County, NM

N 32.66947° W 104.06097°

API# 30-015-34693

# **BBC International, Inc.** Оху

entire spill area

Sarah State Com #1 O Battery

Date: 01/12/2016	DRWG by: K. Purvis
NOT TO SCALE	File: Oxy 2015

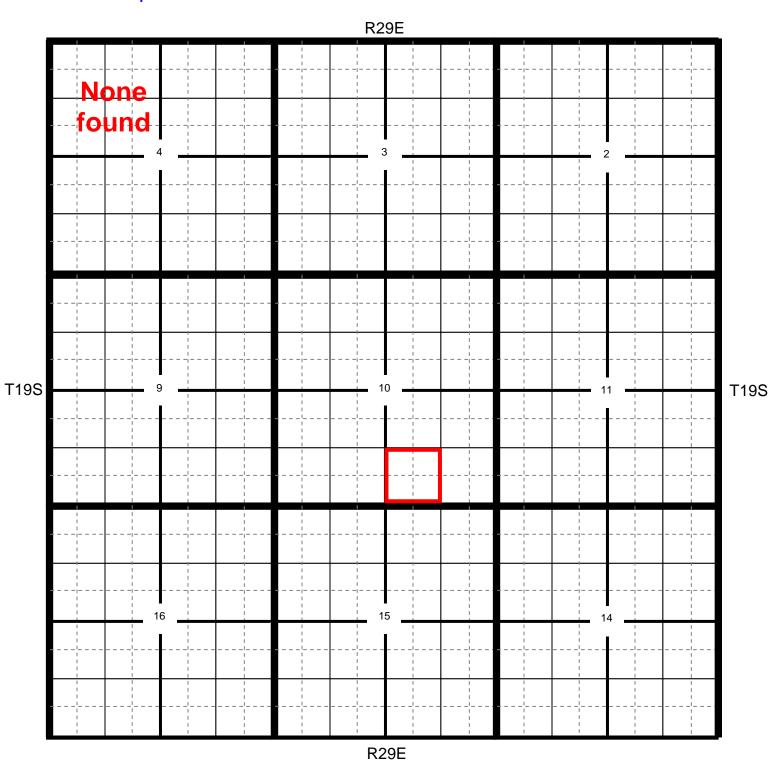


# **Groundwater Plot**

# Oxy Sarah State Com #1 O Battery

CountyUnit LetterSectionTownshipRangeEddyO1019S29E

Trend Map 125'-150'



Location

OCD

USGS

SEO

All Databases

# Oxy Sarah State Com #1 O Battery

CountyUnit LetterSectionTownshipRangeEddyO1019S29E

Trend Map 125'-150'

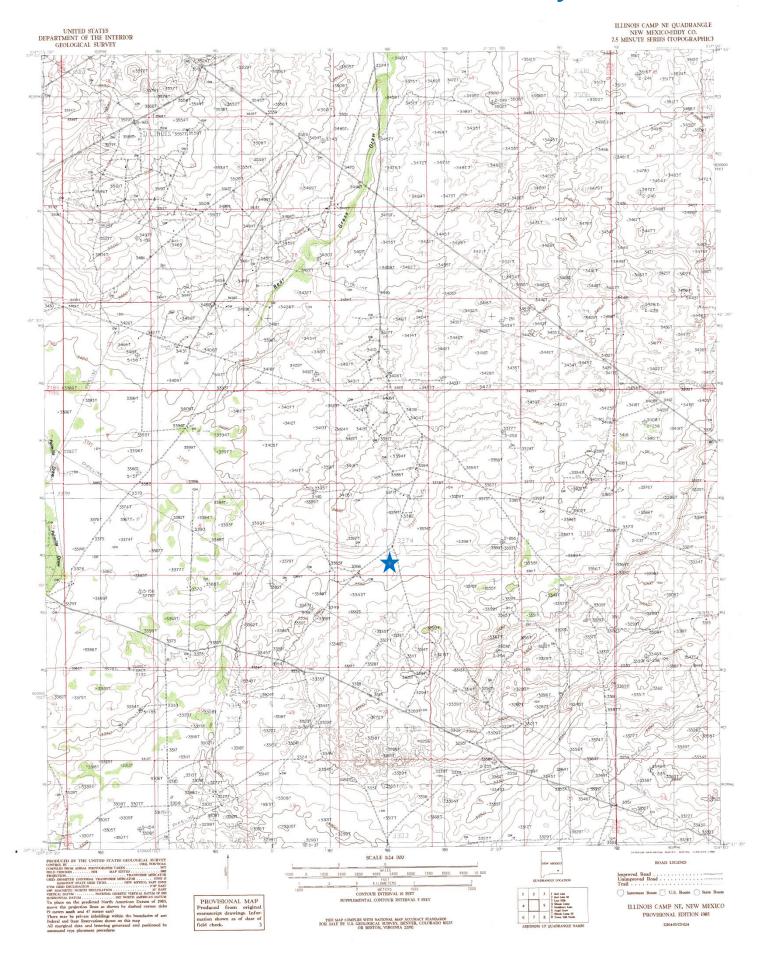
1

NW/NW	NE/NW	NW/NE	NE/NE
None found			
Unit Letter D SW/NW	Unit Letter C SE/NW	Unit Letter B	Unit Letter A SE/NE
Unit Letter E NW/SW	Unit Letter F NE/SW	Unit Letter G NW/SE	Unit Letter H 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

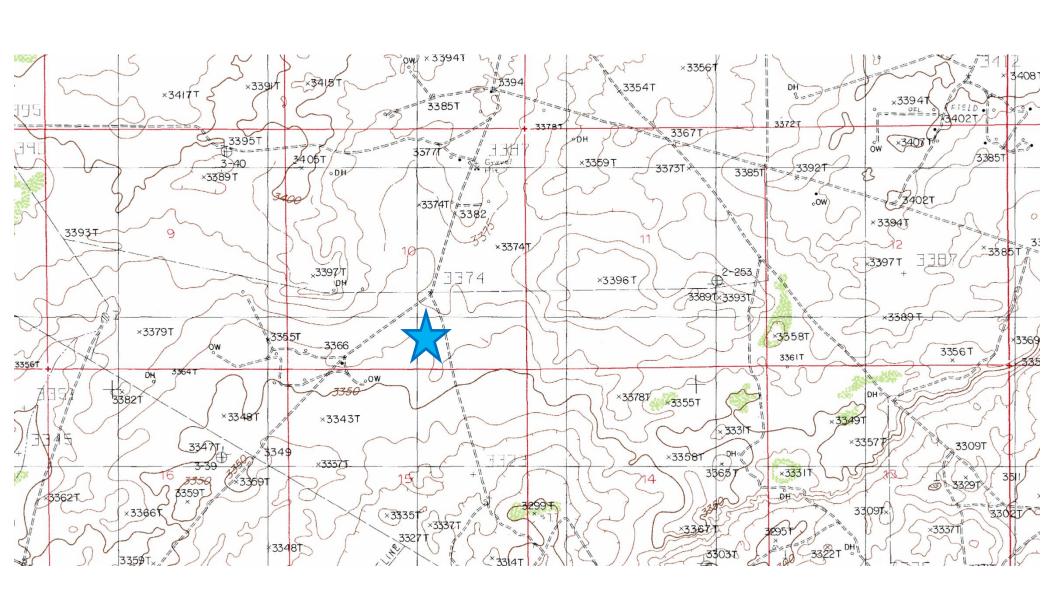
3

# Оху

# Sarah State Com #1 O Battery



Oxy
Sarah State Com #1 O Battery



### Laboratory Analytical Results Summary Sarah State Com #1 O Battery

		Sample	SP1 @ SURFACE	SP1 @ 1'	SP1 @ 2'
Analyte	Method	Date	2/11/16	2/11/16	2/11/16
			mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		n/a	n/a	< 0.050
Toluene	BTEX 8021B		n/a	n/a	< 0.050
Ethylbenzene	BTEX 8021B		n/a	n/a	< 0.050
<b>Total Xylenes</b>	BTEX 8021B		n/a	n/a	<0.150
Total BTEX	BTEX 8021B		n/a	n/a	< 0.300
Chloride	SM4500CI-B		1310	528	<16.0
GRO	TPH 8015M		n/a	n/a	<10.0
DRO	TPH 8015M		n/a	n/a	<10.0

		Sample	SP2 @ SURFACE	SP2 @ 1'	SP2 @ 2'
Analyte	Method	Date	2/11/16	2/11/16	2/11/16
			mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		n/a	n/a	< 0.050
Toluene	BTEX 8021B		n/a	n/a	< 0.050
Ethylbenzene	BTEX 8021B		n/a	n/a	< 0.050
Total Xylenes	BTEX 8021B		n/a	n/a	<0.150
Total BTEX	BTEX 8021B		n/a	n/a	< 0.300
Chloride	SM4500CI-B		1300	512	<16.0
GRO	TPH 8015M		n/a	n/a	<10.0
DRO	TPH 8015M		n/a	n/a	11.9



February 18, 2016

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: SARAH ST COM #1 - O BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 02/12/16 10:35.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-15-7. 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 <a href="https://www.tceq.texas.gov/field/ga/lab">www.tceq.texas.gov/field/ga/lab</a> accred certif.html.

Cardinal Laboratories is accreditated 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)

Celey D. Keine

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: 02/12/2016 Sampling Date: 02/11/2016

Reported: 02/18/2016 Sampling Type: Soil

Project Name: SARAH ST COM #1 - O BATTERY Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Jodi Henson

Project Location: NOT GIVEN

### Sample ID: SP 1 @ SURFACE (H600330-01)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1310	16.0	02/15/2016	ND	416	104	400	3.77	

### Sample ID: SP 1 @ 1' (H600330-02)

Chloride, SM4500Cl-B mg/kg		Analyze	d By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	528	16.0	02/15/2016	ND	416	104	400	3.77	

### Sample ID: SP 1 @ 2' (H600330-03)

BTEX 8021B	mg,	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/16/2016	ND	1.99	99.4	2.00	6.93	
Toluene*	<0.050	0.050	02/16/2016	ND	1.96	97.9	2.00	6.53	
Ethylbenzene*	<0.050	0.050	02/16/2016	ND	1.79	89.4	2.00	6.11	
Total Xylenes*	<0.150	0.150	02/16/2016	ND	5.51	91.9	6.00	5.87	
Total BTEX	<0.300	0.300	02/16/2016	ND					

Surrogate: 4-Bromofluorobenzene (PID 105 % 73.6-140

Surrogate: 4-Bromojtuorovenzene (F1D	103	70 / 3.0-14	U						
Chloride, SM4500CI-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	02/15/2016	ND	416	104	400	3.77	
TPH 8015M	mg	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier

### Cardinal Laboratories \*=Accredited Analyte

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Celey D. Keene



### Analytical Results For:

BBC International, Inc.

Cliff Brunson P.O. Box 805 Hobbs NM, 88241

Fax To: (575) 397-0397

Received: 02/12/2016 Sampling Date: 02/11/2016

Reported: 02/18/2016 Sampling Type: Soil

Project Name: SARAH ST COM #1 - O BATTERY Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Jodi Henson

Project Location: NOT GIVEN

### Sample ID: SP 1 @ 2' (H600330-03)

TPH 8015M	mg	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	02/12/2016	ND	215	108	200	3.48	
DRO >C10-C28	<10.0	10.0	02/12/2016	ND	196	98.1	200	7.87	
Surrogate: 1-Chlorooctane	84.9	% 35-147	,						
Surrogate: 1-Chlorooctadecane	98.6	% 28-171							

### Sample ID: SP 2 @ SURFACE (H600330-04)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1300	16.0	02/15/2016	ND	416	104	400	3.77	

### Sample ID: SP 2 @ 1' (H600330-05)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	512	16.0	02/15/2016	ND	416	104	400	3.77	

Cardinal Laboratories \*=Accredited Analyte

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Celey D. Keine



### Analytical Results For:

BBC International, Inc.

Cliff Brunson P.O. Box 805 Hobbs NM, 88241

Fax To: (575) 397-0397

Received: 02/12/2016 Sampling Date: 02/11/2016

Reported: 02/18/2016 Sampling Type: Soil

Project Name: SARAH ST COM #1 - O BATTERY Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Jodi Henson

Project Location: NOT GIVEN

### Sample ID: SP 2 @ 2' (H600330-06)

BTEX 8021B	mg/	'kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/16/2016	ND	1.99	99.4	2.00	6.93	
Toluene*	<0.050	0.050	02/16/2016	ND	1.96	97.9	2.00	6.53	
Ethylbenzene*	<0.050	0.050	02/16/2016	ND	1.79	89.4	2.00	6.11	
Total Xylenes*	<0.150	0.150	02/16/2016	ND	5.51	91.9	6.00	5.87	
Total BTEX	<0.300	0.300	02/16/2016	ND					
Surrogate: 4-Bromofluorobenzene (PID	106 9	% 73.6-14	0						
Chloride, SM4500Cl-B	mg/	'kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	02/15/2016	ND	416	104	400	3.77	
TPH 8015M	mg/	'kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	02/12/2016	ND	215	108	200	3.48	
DRO >C10-C28	11.9	10.0	02/12/2016	ND	196	98.1	200	7.87	
Surrogate: 1-Chlorooctane	86.9	% 35-147	,						
Surrogate: 1-Chlorooctadecane	99.3	% 28-171							

Cardinal Laboratories \*=Accredited Analyte

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Celey D. Keine



### **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. Keine

# CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

) of

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

(303) 333-2410		
	BILLTO	ANALYSIS REQUEST
	0.0.#:	
9	Company:	
88241	Attn:	
5-397-0397	\ddress:	
Project Owner: OX	Xity:	
	štate: Zip:	
	hone #:	
	ax #:	
MATRIX	PRESERV. SAMPLING	
NTAINERS UNDWATER TEWATER	BASE:	PH BTEX
GRC WAS SOIL OIL SLU	ACIE OTH	
0	5101 9/11/17	
6	1 2111/6 105	
000	V 20 11 10 V	
6 ' '	1 2111111111245	
01/	2/1/16 130	
	W	
any canni anany miranta basa in contact or se deemed waived unless made in writing and re- ing without limitation, business interruptions, loss of Aardinal, regardless of whether such claim is by	unt, sinai be initiated to the arributin paid by the client for freework by Cardinal within 30 days after completion of the soft use, or loss of profits incurred by client, its subsidiaries ased upon any of the above stated reasons or otherwise.	ne applicable ss,
Received By:	Phone Result:	ult: ☐ Yes ☐ No Add'I Phone #:
Received By:	Benson REMARKS	
1.62 Sample Condition Cool Intact Pres Pres	CHECKED BY:	
	## Compete State   Participation   Participati	P.O. #:  877-0397 Address:  City:  State: Zip:  BATEX  Phone #:  Fax #:  Phone #:  Phone #:  Fax #:  GROUNDWATER  WASTEWATER  SOIL  JUDGE:  GROUNDWATER  WASTEWATER  OTHER:  O

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-24ts
#54

### **Kathy Purvis**

From: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>

**Sent:** Thursday, March 17, 2016 8:52 AM

To: Cliff Brunson

**Cc:** Patterson, Heather, EMNRD; Casey Summers; Dusty Wilson; Jennifer\_Duarte@oxy.com;

Ken Swinney; Jennifer Gilkey; Kathy Purvis

**Subject:** RE: OXY-Sarah State Com #1 O Battery-Remediation Plan

RE: OXY USA \* Sarah St Com 1 \* 30-015-34693 \* 2RP-3485 \* DOR 12/3/2015

Cliff,

Your proposal for remediation of the above referenced release is approved. Please reference the **2RP** number listed for future correspondence.

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.

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: Monday, March 14, 2016 6:58 PM

To: Bratcher, Mike, EMNRD

Cc: Patterson, Heather, EMNRD; Casey Summers; Dusty Wilson; Jennifer Duarte@oxy.com; Ken Swinney; Jennifer

Gilkey; Kathy Purvis

Subject: OXY-Sarah State Com #1 O Battery-Remediation Plan

Mike,

This e-mail is to confirm our discussion concerning the remediation plan for the Oxy Sarah State Com #1 O Battery release. I have attached the information packet that we used in our discussion with a cover page describing the remediation plan that we agreed upon.

If you would please reply back via e-mail with your concurrence on this plan, it would be greatly appreciated.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS
President
BBC International, Inc.
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