## **Closure Report**

	Site Description					
Site Name:	Lentini 1 Federal Battery					
Company:	Chevron USA					
Legal Description:	U/L E, Section 1, T23S, R28E					
County:	Eddy County, NM					
GPS Coordinates:	N 32.33723° W 104.04356°					

### **Release Data**

Date of Release:	12/01/2012
Type of Release:	Produced water
Source of Release:	Flow line
Volume of Release:	46.925 bbls
Volume Recovered:	30 bbls

Remediation Specifications							
Remediation Parameters:	Excavate the entire site to a depth of 6 inches. Backfill the site with clean soil. Re-seed the sire with appropriate seed mixture.						
Remediation Activities:	2/17/2017 to 02	/22/2017					
Plan Sent to OCD:	08/26/2017	Email from Cliff Brunson to Mike Bratcher					
OCD Approval of Plan:	09/02/2017	Email from Mike Bratcher to Cliff Brunson					
Plan Sent to BLM:	08/26/2017	Email from Cliff Brunson to Shelly Tucker					
BLM Approval of Plan:	08/26/2017	Email from Shelly Tucker to Cliff Brunson					

	Supporting Documentation
Initial C-141	Signed 12/02/2012
Final C-141	Signed 03/07/2017
Site Diagram	April 2016
Groundwater Plot	<50'
TOPO Maps	April 2016
Lab Summary	05/11/2016

#### 05/11/2016 Lab Analysis 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.

03/07/2016

District 1 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

# RECEIVED

NMOCD ARTESIA

Form C-141 Revised August 8, 2011

Subhit I Oog DiBappropriate District Office in accordance with 19.15.29 NMAC.

#### **Release Notification and Corrective Action OPERATOR** Initial Report 2 Final Report 4323 Name of Company: Chevron USA Contact: Amy Barnhill Address: 2401 Avenue O Eunice, NM 88231 Telephone No.: 432-940-8524 Facility Name: Lentini I Federal Battery Facility Type: Tank Battery Surface Owner: BLM Mineral Owner: BLM API No. 30-015-27535 LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
E	1	23	28					Eddy

Latitude: 32.33380 Longitude: -104.04287

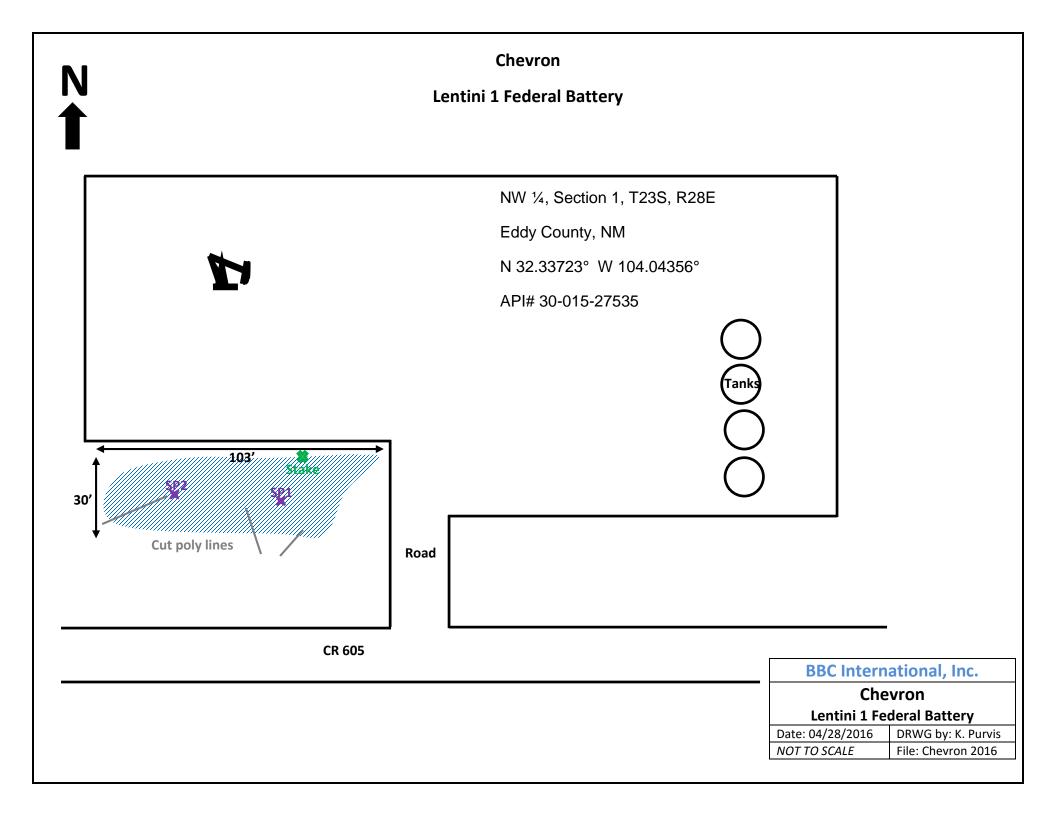
### NATURE OF RELEASE

Thurst CD I and D 1 111			
Type of Release: Produced Water		Volume of Release: 46.925 Bbls	Volume Recovered: 30 Bbls
Source of Release: Flowline		Date and Hour of Occurrence:	Date and Hour of Discovery
	· · · · · · · · · · · · · · · · · · ·	12-1-12	12-1-12 @ 8:50am
Was Immediate Notice Given?		If YES, To Whom?	
(1)	Yes 🔲 No 🔲 Not Required	I Called 575-393-6161 E.L. Gonzale	s ·
By Whom? Amy Barnhill		Date and Hour: 12-2-12 @ 11:00a	m
Was a Watercourse Reached?		If YES, Volume Impacting the Wa	
	Yes No	It i ES, volume impacting the wa	tercourse.
If a Watercourse was Impacted, Descr	ihe Fully *		
1 1	<b>3</b>	:	
Describe Cause of Problem and Reme	dial Action Taken *		
Pin hole in pipe body. Switched valve	s so flow stopped. Called vacuum	truck to pick up fluid	
r in note in pipe body. O miened varie	si so now stopped. Caned vacuum	r dock to pick up huid.	
Describe Area Affected and Cleanup	Action Takan *	·····	
Describe Area Anceled and Cleanup A	Action Taken.		·
75' x 27' x 156' Vacuum truck pick	ed up 30 Philo of BS & W. Further	r remediation will be performed in acco	vidence with a NMOCD encrowed
remediation plan.	$[a \ up \ bo \ bo \ s \ b \ b \ c \ w. Further$	r remediation will be performed in acco	ordance with a NMOCD approved
remeuration plan.			
		·	
The share of the share share in the state of			
I hereby certify that the mormation g	iven above is true and complete to	the best of my knowledge and understa	and that pursuant to NMOCD rules and
regulations all operators are required t	o report and/or file certain release	notifications and perform corrective ac	tions for releases which may endanger
public health or the environment. The	e acceptance of a C-141 report by t	he NMOCD marked as "Final Report"	does not relieve the operator of liability
should their operations have failed to	adequately investigate and remedia	ate contamination that pose a threat to g	round water, surface water, human health
or the environment. In addition, NMC	JCD acceptance of a C-141 report	does not relieve the operator of respon-	sibility for compliance with any other
federal, state, or local laws and/or regu	ulations.		
		OIL CONSERV	VATION DIVISION
		· · · · · · · · · · · · · · · · · · ·	
Signature:			11
		Approved by Environmental Speciali	st: Alt have
Printed Name: Amy Barnhill		Approved by Environmental Speciali	Signed By MIII4 Examples
		IAN 2 2 2013	
Title: HE Specialist		Approval Date:	Expiration Date:
		••••••••••••••••••••••••••••••••••••••	
E-mail Address: ABarnhill@chevron	.com	Conditions of Approval:	
		Remediation per OCD R	ule & Attached
Date: 12-2-2012	Phone: 432-940-8524		
Attach Additional Sheets If Necess		Guidelines. SUBMIT REME	
Trataon Additional Directs II 1400088	jui j	PROPOSAL NO LATER T	HAN: $\angle K \not\models D / ()$
		February 22,20	13
	I	ICHIM J LL AL	

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

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

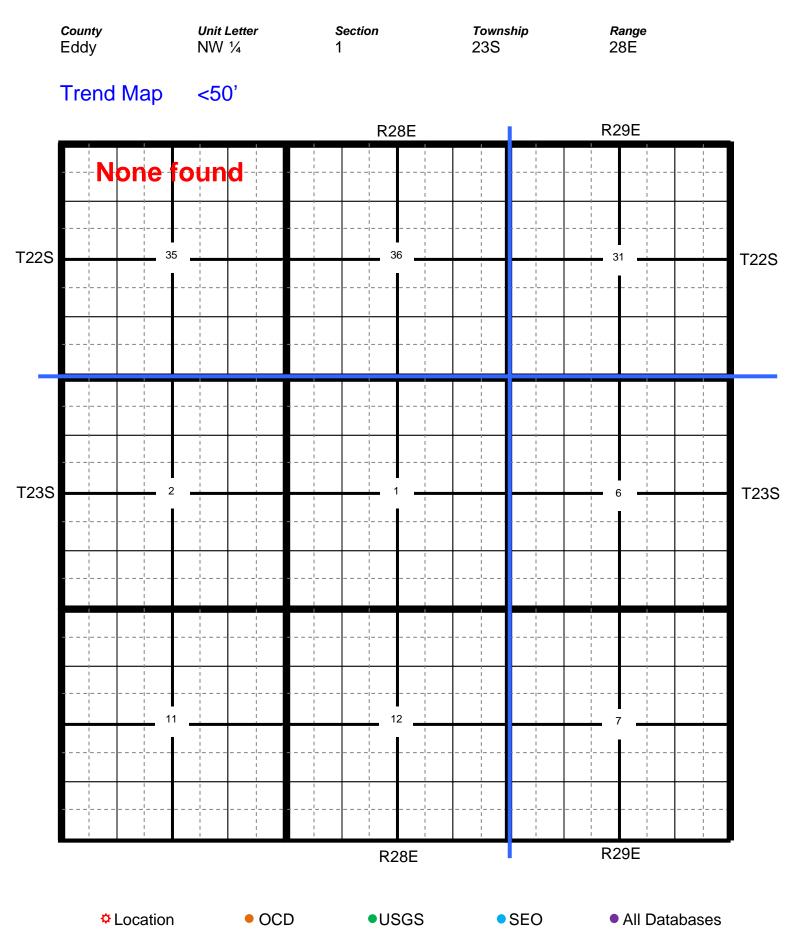
Name of C Address Facility Na		Chevron US			(	OPERAT	<b>OD</b>	r		
Address		Unevron US						L	Initia	l Report 🛛 🛛 Final Repo
	6301 110011	ville Blvd, N		TX 70706		Contact J Telephone I	osepha DeLeon No. (575) 263			
		ini 1 Federal		17 19100		Facility Typ				, area
Surface On			···· ·					<u> </u>		
Surface Ow	ner BLI	<u>vi</u>		Mineral C		BLM			API No	b. <u>30-015-27535</u>
Unit Letter	Section	Township	Range	LOCA'		OF REL			T	
		rownsnip	Raige	reet nom me	norui/	Soun Line	Feet from the	East/ v	Vest Line	County
E	1	23\$	28E							Eddy County, NM
			La	titude <u>N 32.33</u>	<u>723°</u>	Longitud	e <u>W 104.04356</u>	0		
				NATI	URE (	OF RELE	ASE			
Type of Rele		aced water				Volume of		5 bbls		Recovered 30 bbls
Source of Release Flow line							lour of Occurrenc	e		Hour of Discovery
Was Immedi	Vas Immediate Notice Given?					12/01/2012 If YES, To			12/01/201	2 @ 8:50 am
		$\boxtimes$	Yes 🗌	No 🔲 Not Re	equired	NMOCD	Tr Bollit			
By Whom?		hill				Date and H	our 12/02/2012	2@11:0	0 am	
Was a Watercourse Reached?					If YES, Vo	lume Impacting t	he Wate	rcourse.		
		⊔_ acted, Descri								
x pin hole in lispatched to	the body of recover 301	a flowline car bbls of produc	used a leal ced water.	c of approximately	y 46 bbl	s of produced	water. The valve	e was sw	vitched to s	stop flow. A vacuum truck wa
Describe Are	Affected a	nd Cleanup A	ction Take	en.*						
he area affect pproved by l	eted is appro Aike Bratch	oximately 103 er of NMOCI	' x 30' at 1 D via emai	he southwest com l on 09/02/2016 a	ner of th and appr	e location. R oved by Shell	emediation was c y Tucker of the E	omplete 3LM via	d in accord email on (	lance with the remediation pla 08/26/2016.
egulations al ublic health hould their o r the environ	operators a or the enviro perations ha ment. In ad	re required to onment. The a ve failed to ac	report and acceptance lequately CD accept	l/or file certain re of a C-141 repoint investigate and re	elease no rt by the mediate	tifications an NMOCD ma contaminatio	d perform correct rked as "Final Re n that pose a thre	ive actio port" do at to gro	ons for rele es not relie und water.	uant to NMOCD rules and ases which may endanger eve the operator of liability surface water, human health mpliance with any other
	Juli	Len					OIL CONS	SERVA	ATION	DIVISION
ignature:	V Locort-				A	Approved by H	Environmental Sp	ecialist:		
rinted Name							······································			
itle: HES	Compliance	Support- Env	rironmenta	1	A	pproval Date	:	E	xpiration I	Date:
					1					1





### **Groundwater Plot**

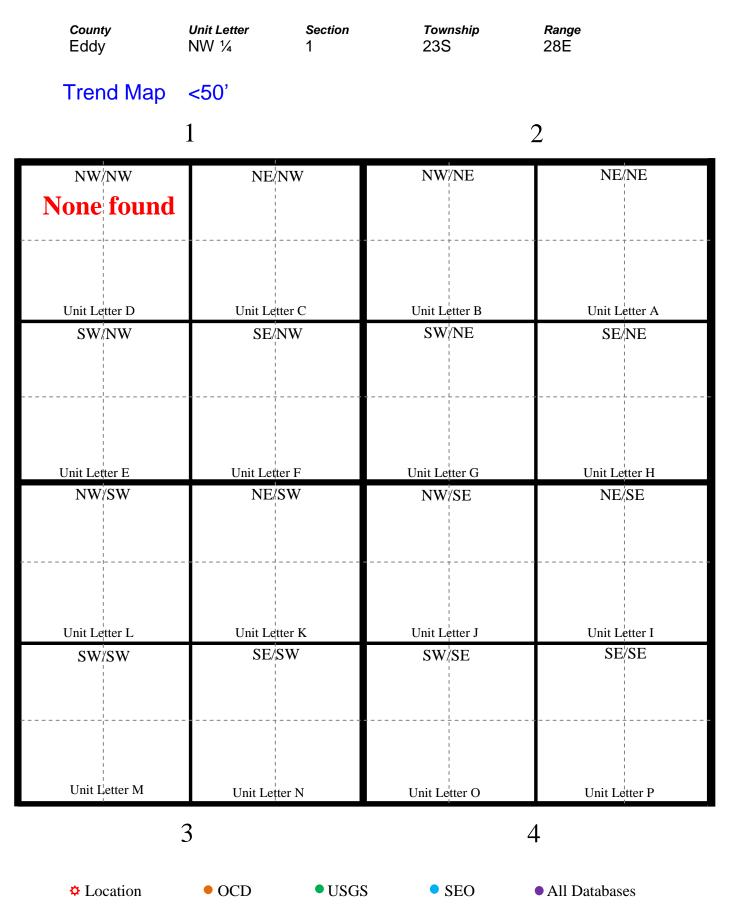
## Chevron Lentini 1 Federal Battery





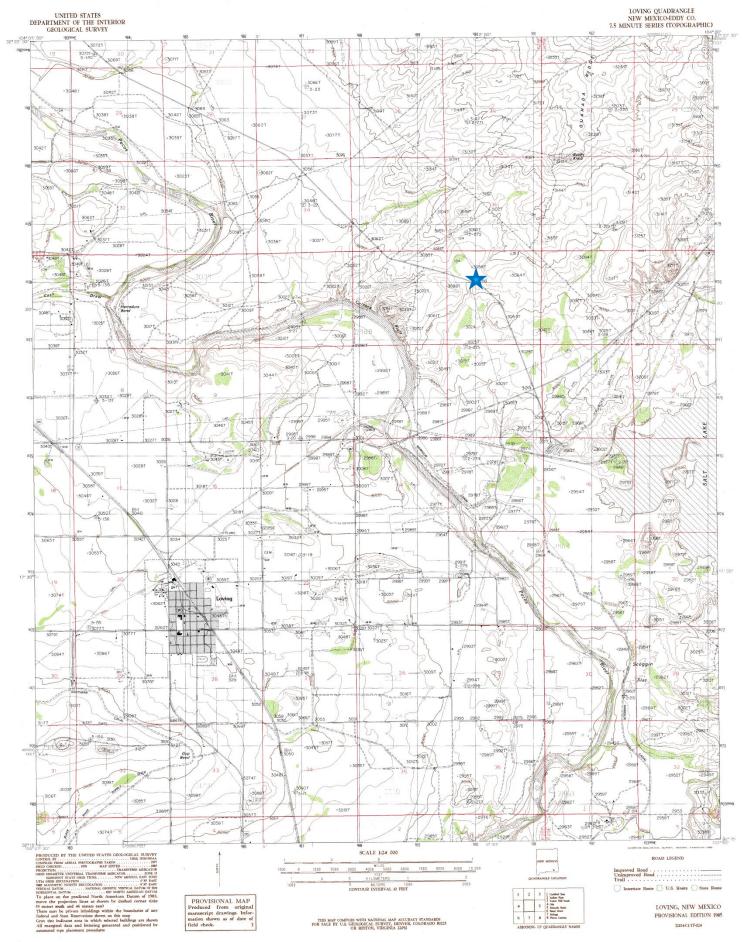
Section Quarters

## Chevron Lentini 1 Federal Battery



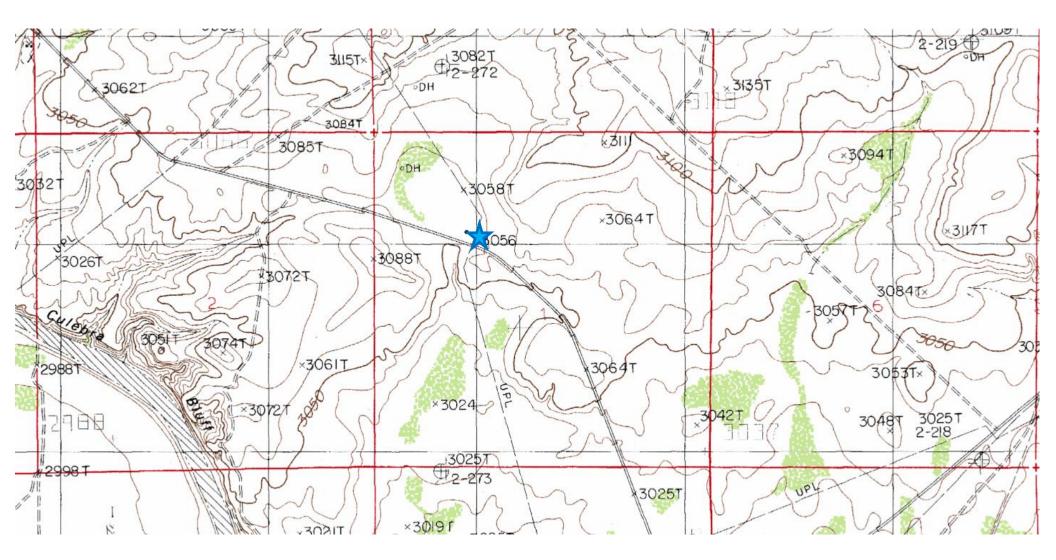
## Chevron

# Lentini 1 Federal Battery



# Chevron

# **Lentini 1 Federal Battery**



#### Laboratory Analytical Results Summary Lentini 1 Federal Battery

		Sample	SP1 @ SURFACE	SP1 @ 1'	SP1 @ 2'
Analyte	Method	Date	5/11/16	5/11/16	5/11/16
			mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		< 0.050	n/a	n/a
Toluene	BTEX 8021B		< 0.050	n/a	n/a
Ethylbenzene	BTEX 8021B		< 0.050	n/a	n/a
Total Xylenes	BTEX 8021B		<0.150	n/a	n/a
Total BTEX	BTEX 8021B		< 0.300	n/a	n/a
Chloride	SM4500CI-B		1440	128	96
GRO	TPH 8015M		<10.0	n/a	n/a
DRO	TPH 8015M		89	n/a	n/a

		Sample	SP2 @ SURFACE	SP2 @ 1'	SP2 @ 2'
Analyte	Method	Date	5/11/16	5/11/16	5/11/16
			mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		< 0.050	n/a	n/a
Toluene	BTEX 8021B		< 0.050	n/a	n/a
Ethylbenzene	BTEX 8021B		< 0.050	n/a	n/a
Total Xylenes	BTEX 8021B		<0.150	n/a	n/a
Total BTEX	BTEX 8021B		< 0.300	n/a	n/a
Chloride	SM4500CI-B		288	80	80
GRO	TPH 8015M		<10.0	n/a	n/a
DRO	TPH 8015M		85.2	n/a	n/a



May 19, 2016

Cliff Brunson BBC International, Inc. P.O. Box 805

Hobbs, NM 88241

**RE: LENTINI 1 FED BATTERY** 

Enclosed are the results of analyses for samples received by the laboratory on 05/17/16 14:35.

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\_accred\_certif.html">www.tceq.texas.gov/field/ga/lab\_accred\_certif.html</a>.

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)

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. Keine

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:	05/17/2016	Sampling Date:	05/11/2016
Reported:	05/19/2016	Sampling Type:	Soil
Project Name:	LENTINI 1 FED BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	CHEVRON		

#### Sample ID: SP 1 @ SURFACE (H601083-01)

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	05/18/2016	ND	2.14	107	2.00	2.44	
Toluene*	<0.050	0.050	05/18/2016	ND	2.07	104	2.00	2.64	
Ethylbenzene*	<0.050	0.050	05/18/2016	ND	1.86	93.0	2.00	2.09	
Total Xylenes*	<0.150	0.150	05/18/2016	ND	5.79	96.5	6.00	1.97	
Total BTEX	<0.300	0.300	05/18/2016	ND					
Surrogate: 4-Bromofluorobenzene (PID	100 %	6 73.6-14	0						
Chloride, SM4500Cl-B	mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1440	16.0	05/18/2016	ND	416	104	400	3.77	
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	05/17/2016	ND	184	91.8	200	5.76	
DRO >C10-C28	89.0	10.0	05/17/2016	ND	206	103	200	4.49	
Surrogate: 1-Chlorooctane	81.5 9	35-147	7						
Surrogate: 1-Chlorooctadecane	99.2 9	6 28-171							

#### Sample ID: SP 1 @ 1' (H601083-02)

Chloride, SM4500Cl-B	mg/	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	128	16.0	05/18/2016	ND	416	104	400	3.77	

#### **Cardinal Laboratories**

\*=Accredited Analyte

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Celeg D. Keine

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:	05/17/2016	Sampling Date:	05/11/2016
Reported:	05/19/2016	Sampling Type:	Soil
Project Name:	LENTINI 1 FED BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	CHEVRON		

#### Sample ID: SP 1 @ 2' (H601083-03)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	05/18/2016	ND	416	104	400	3.77	

### Sample ID: SP 2 @ SURFACE (H601083-04)

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	05/18/2016	ND	2.14	107	2.00	2.44	
Toluene*	<0.050	0.050	05/18/2016	ND	2.07	104	2.00	2.64	
Ethylbenzene*	<0.050	0.050	05/18/2016	ND	1.86	93.0	2.00	2.09	
Total Xylenes*	<0.150	0.150	05/18/2016	ND	5.79	96.5	6.00	1.97	
Total BTEX	<0.300	0.300	05/18/2016	ND					
Surrogate: 4-Bromofluorobenzene (PI	D 99.5	% 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	288	16.0	05/18/2016	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	05/18/2016	ND	169	84.4	200	0.716	
DRO >C10-C28	85.2	10.0	05/18/2016	ND	177	88.3	200	0.925	
Surrogate: 1-Chlorooctane	81.7	% 35-147	,						
Surrogate: 1-Chlorooctadecane	95.9	% 28-171							

#### **Cardinal Laboratories**

#### \*=Accredited Analyte

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Celeg D. Keine

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:	05/17/2016	Sampling Date:	05/11/2016
Reported:	05/19/2016	Sampling Type:	Soil
Project Name:	LENTINI 1 FED BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	CHEVRON		

#### Sample ID: SP 2 @ 1' (H601083-05)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	05/18/2016	ND	416	104	400	3.77	

#### Sample ID: SP 2 @ 2' (H601083-06)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	05/18/2016	ND	416	104	400	3.77	

#### **Cardinal Laboratories**

\*=Accredited Analyte

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



#### **Notes and Definitions**

- ND
   Analyte NOT DETECTED at or above the reporting limit

   RPD
   Relative Percent Difference
- \*\* Samples not received at proper temperature of 6°C or below.
- \*\*\* Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

#### Cardinal Laboratories

#### \*=Accredited Analyte

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager

Company Name: BBC International Inc.	BILL TO	ANALYSIS REQUEST
	P.O. #:	_
Address: P.O. Box 805	Company:	
State: NM Zip:	88241 Attn:	
5-397-6388 Fax #: 575-	397 Address:	
Project Owner: C	heviran city:	
ame: Lentin, 1 Fed Blog		
5	Phone #:	
Sampler Name: AND GNARGO	Fax #:	
	MATRIX PRESERV. SAMPLING	
G)RAB OR (C)OMP	GROUNDWATER WASTEWATER SOIL OIL SLUDGE OTHER : ACID/BASE: ICE / COOL OTHER :	TPA BTES
2 Spl @ Surface S		
Contraction Contraction	0201 #1110 /	
S I 2 P 1	1 1 5/11/6 1100	
10 X 2/ 10	24.11 9/11/S	
PLEASE MOTE: Liability and Damages. Cardina's liability and client's exclusive remedy for any claim arising whether based in contract or root, shall be limited to the amount paid by the client of the applicable analyses. All claims including those for neglepres and any other cuase whatsoewer shall be deened waived unitess made in writing and received by Cardina within 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,	arising whether based in contract or iord, shall be limited to the annound paid by the cirect in waived unless made in writing and reserved by C acting within 30 days after completion of the an limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, limitation, business interruptions, loss of use, or loss of profits incurred by client.	- of the applicable beldiaries.
Affiliates or successors arising out of or related to the performance of services hereunder by Caturnal, regar Relinquifshed By: Date: 5/11/12 Receiv Time: 5/00/0/01		Phone Result:
	Received By:	
Sampler - UPS - Bus - Other: 5,70	Sample Condition CHECKED BY: Cool Intact Pres Pres	

RE: Chevron USA \* Lentini 1 Fed Btry (#3) \* 30-015-27535 \* **<u>2RP-1510</u>** \* DOR: 12/10/12

Cliff,

Your proposal for remediation of the above referenced release is approved. Please advise once remedial activities have been scheduled. Federal sites will require like approval from BLM.

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: Friday, August 26, 2016 7:18 AM
To: Bratcher, Mike, EMNRD
Cc: Patterson, Heather, EMNRD; Stephen Gwin; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: Chevron Lentini 1 Federal Battery - Remediation Plan

Mike,

This e-mail is to confirm our discussion concerning the remediation plan for the Chevron Lentini 1 Federal 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. 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



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From:	Tucker, Shelly
To:	Cliff Brunson
Cc:	Stephen Gwin; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject:	Re: Chevron Lentini 1 Federal Battery - Remediation Plan
Date:	Friday, August 26, 2016 9:31:31 AM

BLM accepts/approves your work plan as written.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

### **Shelly J Tucker**

Environmental Protection Specialist Bureau of Land Management

620 E. Greene St Carlsbad, NM 88220

575.234.5905 - Direct 575.361.0084 - Cellular

<u>stucker@blm.gov</u>

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The <u>BLM acceptance/approval does not</u> relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the 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.

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On Fri, Aug 26, 2016 at 7:17 AM, Cliff Brunson <<u>cbrunson@bbcinternational.com</u>> wrote:

Shelly,

I have attached a remediation plan for the Chevron Lentini 1 Federal Battery release. This is

an old release that the OCD found in the audit of Chevron spills and we sampled it. This plan has been approved by Mike Bratcher of the NMOCD. Oxy is requesting the BLM's approval of this plan as well. Upon your review of the materials, it would be appreciated if you would respond via email with the BLM's approval.

If you have any questions, please let me know.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS

President

BBC International, Inc.

World-Wide Environmental Specialists

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