

## Bratcher, Mike, EMNRD

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**From:** Bratcher, Mike, EMNRD  
**Sent:** Thursday, January 09, 2014 1:40 PM  
**To:** 'Cliff P. Brunson'  
**Cc:** Chris Jones; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** RE: OXY-U.S. 13 Federal #2-Remediation Plan

Reference: OXY USA WTP, LP \* US 13 Fed 002 \* 30-015-34272 \* H-13-22s-24e \* Eddy County, New Mexico  
NMOCD Reference numbers: 2RP-726 (date of release: 2/6/2010) & 2RP-885 (date of release: 8/19/2011)

Cliff,

As discussed, OCD will approve closure (with form C-141 Final Report) for the above referenced releases.

If you have any questions or concerns, 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

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**From:** Cliff P. Brunson [<mailto:cbrunson@bbcinternational.com>]  
**Sent:** Thursday, January 02, 2014 12:42 PM  
**To:** Bratcher, Mike, EMNRD  
**Cc:** Chris Jones; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** OXY-U.S. 13 Federal #2-Remediation Plan

Mike,

This e-mail is to confirm our conversation on December 18, 2013 about the remediation plan for the above referenced site. I have attached the materials that we used in our discussion. As discussed, Oxy will be allowed to close this site with no further action. As you recall and review the attached e-mail chain discussion between you, Chris Jones, and Jim Amos and the attached lab data for the resampling of SP2 at 6 inches, the contaminant levels are reduced to below guidelines allowing for no further action. Oxy appreciates your working with them to get this site to closure.

If you would please e-mail your concurrence with this remediation plan, it would be greatly appreciated.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS  
President  
BBC International, Inc.  
World-Wide Environmental Specialists  
Mailing Address:  
P. O. Box 805  
Hobbs, NM 88241-0805 USA  
Shipping Address:  
1324 W. Marland St.  
Hobbs, NM 88240 USA

Phone: (575) 397-6388  
Fax: (575) 397-0397  
E-Mail: [cbrunson@bdcinternational.com](mailto:cbrunson@bdcinternational.com)

\*\*\*\*\*

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**Bratcher, Mike, EMNRD**

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**From:** Microsoft Outlook  
**To:** Cliff P. Brunson; Chris Jones; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Sent:** Thursday, January 09, 2014 1:40 PM  
**Subject:** Relayed: RE: OXY-U.S. 13 Federal #2-Remediation Plan

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[Cliff P. Brunson \(cbrunson@bbcinternational.com\)](mailto:cbrunson@bbcinternational.com)

[Chris Jones \(Christopher Jones@oxy.com\)](mailto:Chris.Jones@oxy.com)

[Ken Swinney \(kswinney@bbcinternational.com\)](mailto:kswinney@bbcinternational.com)

[Jennifer Gilkey \(jgilkey@bbcinternational.com\)](mailto:jgilkey@bbcinternational.com)

[Kathy Purvis \(kathy@bbcinternational.com\)](mailto:kathy@bbcinternational.com)

Subject: RE: OXY-U.S. 13 Federal #2-Remediation Plan

## Bratcher, Mike, EMNRD

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**From:** Bratcher, Mike, EMNRD  
**Sent:** Wednesday, October 12, 2011 8:08 AM  
**To:** 'Cliff P. Brunson'  
**Cc:** Dusty Wilson; C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** RE: Oxy US Federal 13-2

Reference: OXY USA \* US 13 Fed 002 \* 30-015-34272 \* H-13-22s-24e \* Eddy County, New Mexico  
OCD Tracking Number: **2RP-885** \* DOR: 8/19/11

Cliff,

As discussed, the remediation proposal submitted for cleanup of the above referenced produced fluid release is approved with the following conditions and/or stipulations:

- Notify OCD District 2 office 48 hours prior to commencement of remedial activities.
- Notify OCD District 2 office 48 hours prior to obtaining any samples where the analyses will be submitted to OCD.
- Confirmation samples are to be obtained for hydrocarbon analyses, prior to backfilling, in the areas of SP-1, SP-2, and SP-3.
- OCD approval required for backfilling excavations.
- Submit a Form C-141 Final Report and closure report upon satisfactory completion of project.
- Project is to be completed and closure documentation submitted to OCD not later than December 12, 2011.
- Like approval by BLM or any other regulatory authority as may be applicable.

Be advised, OCD approval does not relieve the operator of liability should their operations have failed 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 notifications, please contact me.

***Mike Bratcher***

NMOCD District 2  
811 S. First Street  
Artesia, NM 88210  
575-748-1283 Ext. 108  
575-626-0857  
[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)

---

**From:** Cliff P. Brunson [<mailto:cbrunson@bbcinternational.com>]  
**Sent:** Saturday, September 17, 2011 3:43 PM  
**To:** Bratcher, Mike, EMNRD  
**Cc:** Dusty Wilson; C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** Oxy US Federal 13-2

Mike,

This e-mail is to confirm our discussion on September 13, 2011 concerning the remediation plan for the release that occurred at the Oxy US Federal 13-2. As agreed, Oxy will excavate 6 inches of the impacted soil in the spill area and in the area of SP-2, the excavation will be 1 foot and a confirmation sample will be collected to verify the hydrocarbons are below 5,000 ppm which is the NMOCD guideline. The excavation will then be backfilled with clean soil. The depth to groundwater in this area is approximately 100 feet.

I have attached the site drawing and laboratory data and a few pictures that we reviewed during our discussion for your files. If you would please reply back via e-mail with your concurrence of this remediation plan, it would be greatly appreciated.

Oxy and I thank you for your assistance in handling this matter.

Thanks, Cliff

Cliff 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](mailto:cbrunson@bbcinternational.com)

\*\*\*\*\*

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\*\*\*\*\*

## Bratcher, Mike, EMNRD

---

**From:** Microsoft Outlook  
**To:** Cliff P. Brunson; Dusty Wilson; C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Sent:** Wednesday, October 12, 2011 8:08 AM  
**Subject:** Relayed: RE: Oxy US Federal 13-2

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[Cliff P. Brunson \(cbrunson@bbcinternational.com\)](mailto:cbrunson@bbcinternational.com)

[Dusty Wilson \(Dusty\\_Wilson@oxy.com\)](mailto:Dusty_Wilson@oxy.com)

[C J Summers \(Chancey Summers@oxy.com\)](mailto:C_J_Summers@oxy.com)

[Ken Swinney \(kswinney@bbcinternational.com\)](mailto:kswinney@bbcinternational.com)

[Jennifer Gilkey \(jgilkey@bbcinternational.com\)](mailto:jgilkey@bbcinternational.com)

[Kathy Purvis \(kathy@bbcinternational.com\)](mailto:kathy@bbcinternational.com)

Subject: RE: Oxy US Federal 13-2

## **Bratcher, Mike, EMNRD**

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**From:** Christopher\_Jones@oxy.com  
**Sent:** Tuesday, February 19, 2013 10:36 AM  
**To:** jamos@blm.gov; Bratcher, Mike, EMNRD  
**Subject:** FW: Undesirable Event: 11NU120TG, US 13 Federal 2, Cleanup Plan Approval Stipulations  
**Attachments:** US 13 Fed 2 Prevention Plan.docx; Written Order on US 13 Fed 2.pdf

Guys, regarding the spill at the US 13 Fed 2, I discussed this with Terry a while back, you can look through the email sting, about this site. We did and do have an approved cleanup plan, however we have had substantial growth over the past year out in the spill site. As I explained to Terry, I would hate to go through with the plan and tear up the plants that are out there and destroy cultured root systems. I would like to put this on a year monitoring as the initial spill happened almost 2 years ago and after one year the growth is good I figured another year would be a good determining guide. Your thoughts and approvals moving forward would be greatly appreciated.

*Chris Jones  
HES Specialist  
Permian Primary Production  
Carlsbad, NM  
Cell 575-499-3337  
Off 575-628-4121*

*"We do not inherit the earth from  
our ancestors; we borrow it from  
our children." Chief Seattle*

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**From:** Jones, Christopher K  
**Sent:** Monday, November 19, 2012 8:01 AM  
**To:** 'Gregston, Terry G'  
**Subject:** RE: Undesirable Event: 11NU120TG, US 13 Federal 2, Cleanup Plan Approval Stipulations

Terry,

In regards to the US 13 Fed #2 an archeological survey is going to be done as soon as we can get a surveyor to do so. I want to discuss some concerns with you however. My hopes were that you had a chance to go out and look at the spill site as to get a better picture of what I was trying to explain to you on the phone. With the new growth and the continued growth in that area I would hate to go in and tear all of that out and destroy the root system of the indigenous plants and brush. That being said I would like for us to put this area in a monitoring stage instead of going ahead with the original cleanup plan. We can go ahead forward with that plan if you think that would be better but after looking at it I think we would be doing more harm than good. Let me know your thoughts as it pertains to this issue asap as we can move forward either way. I have also attached the signed written order and prevention measures we will be taking in this area. A signed copy will be mailed as well. Thanks

*Chris Jones  
HES Specialist  
Permian Primary Production  
Carlsbad, NM  
Cell 575-499-3337  
Off 575-628-4121*

*"We do not inherit the earth from our ancestors; we borrow it from our children." Chief Seattle*

---

**From:** Gregston, Terry G [mailto:tgregsto@blm.gov]  
**Sent:** Wednesday, November 07, 2012 6:44 PM  
**To:** Jones, Christopher K; mike.bratcher@state.nm.us  
**Subject:** Undesirable Event: 11NU120TG, US 13 Federal 2, Cleanup Plan Approval Stipulations

Mr. Jones,

This notification is in regard to the following location and undesirable event:

Event Number: 11NU120TG  
Event Date: 8/19/2011  
Event Name: US 13 Federal 2  
Legals: T22S/R24E, sec. 13, SENE

The submitted cleanup plan from BBC International for the above location is approved with the following conditions of approval:

**Special Stipulations:**

1. As stated previously in an email to the operator dated 11/02/11, an archeological survey must be completed prior to beginning cleanup operations on this location. No archeological survey has been conducted or submitted to the BLM as of this date of plan approval. (See plan implementation requirements listed below.)
2. This location and associated facilities had four spills in an 18 month period during which a total release of 1,743 barrels occurred. As requested in an email to the operator dated 11/02/11, OXY shall submit a spill prevention plan with specified actions, increased maintenance/testing measures, and/or equipment replacement that will be implemented to prevent future large spills from occurring in a critical cave/karst area from this well location, associated facility, and associated infrastructure. (See attached Written Order 13TG001, paper copy will be sent by certified mail to the operator). As per the written order, the abatement date for plan submission is 12/07/12. The plan should be submitted in conjunction with a Sundry Notice.

**Notification Stipulations:**

1. **A copy of the cleanup plan and conditions of approval must be given to the contractor or site work personnel and be present on the location during all cleanup operations.**
2. **The authorized officer must be notified at the following phases of cleanup or conditions:**
  - a. Prior to moving equipment on location for cleanup
  - b. When the excavation is nearing completion and a BLM inspection of the excavation or witnessing of sampling is required by the cleanup plan COA's.
  - c. When the cleanup work is nearing completion and to schedule a final onsite prior to removal of equipment.
  - d. Three days before the site is seeded.
  - e. Any time that a variance of the approved plan or conditions of approval is required.
  - f. In the event that you encounter excavation difficulties, unexpected void areas, or archeological artifacts the Authorized Officer must be contacted immediately. An onsite may be required to assess the situation.
3. The authorized officer on this undesirable event case is:

**Terry Gregston**  
**(575) 361-2635**  
**tgregsto@blm.gov**

**Plan Implementation:**

1. Archeological survey must be completed within **30** days of plan approval and submitted to the BLM for review, clearance, or archeological monitoring stipulations.

2. Cleanup operations will begin within **20** days of BLM archeological review.

**Archeology Stipulations:**

1. An archeological survey is required for this location prior to beginning any cleanup work.

**Depending on the results of the archeological survey:**

2. An archeological monitor may be required for this location during all work operations.

In the event that archeological artifacts are discovered during cleanup operations, contact the authorized officer on this case immediately. An onsite will be required to assess the situation.

**Pasture Impacted Areas:**

1. The BLM requires horizontal cleanup of the spill impacted areas in addition to vertical cleanup/mitigation measures.
2. The BLM may wish to inspect the excavation once it reaches cleanup depth/width. Confirmation samples of excavation bottoms, sidewalls and any visibly affected areas outside of the excavation trench will be required; the BLM may witness the sampling. Contact the authorized officer to schedule.
3. Lab analysis of the confirmation sampling must be forwarded to the authorized officer for final approval before backfilling. Based on the sampling results, additional cleanup may be required or the site may be approved for closure.
4. Once final approval of cleanup is given, the excavation can be backfilled with clean soil to the level of the original native contour plus enough loft to accommodate the settling and compaction of unconsolidated fill soils.
5. The top **6** inches of the backfill material must be topsoil similar to that in the surrounding native terrain.
6. If pastures are not contaminated but are impacted by cleanup operations, the impacts to the pasture areas will mitigated by recontouring the impacted areas and restoring the surface as listed in items 7 through 9 of this section.
7. Install erosion control measures in the pasture-affected areas to prevent the unconsolidated reclamation materials from washing or blowing away until reclaimed areas settle and begin to revegetate.
8. Rip and seed reclaimed and equipment-impacted pasture areas with BLM seed mix #3 and #4, 50/50 mix.
9. Barricade entrance to reclaimed pasture areas with fencing or an earthen barrier sufficient to prevent vehicular access.
10. Continue to monitor spill reclamation area to ensure impacted pasture areas revegetate and that erosion issues do not develop.

**Other Stipulations:**

1. At the time of the final onsite for this location, the production facilities, well pad, access road, and the surrounding pasture areas must be in a condition that will pass a routine inspection.
2. All household trash, debris, disconnected pipe and equipment must be removed from the area and the surrounding pasture and hauled to an authorized landfill. Do not bury cleanup trash, equipment debris, or household garbage in the cleanup excavation.

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**BLM approval of this proposal does not 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 location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues 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.**

Thank you for your attention to these concerns,

**Terry Gregston**

Environmental Protection Specialist  
Bureau of Land Management  
620 E. Greene St.  
Carlsbad, NM 88220  
Office (575) 234-5958  
Cell (575) 361-2635

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## Prevention Plan

### US 13 Federal #2

- Oxy will get with its Mechanical Integrity group to do a survey on the lines in that area and come up with a recommended replacement plan.
- The flow line after the last leak was replaced with new.
- These lines will be visually checked daily.

# OPERATOR'S COPY

Form 3160-18  
(October, 1999)

Number 13TG001  
Page 1 of 1

Certified Mail - Return Receipt Requested  
70101870000352261436

## UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT NOTICE OF WRITTEN ORDER

IDENTIFICATION	
ID	
Lease	NMNM97110
CA	
Unit	
PA	

Bureau of Land Management Office <b>CARLSBAD FIELD OFFICE</b>	Operator <b>OXY USA WTP LIMITED PTNRSHIP</b>
Address <b>620 E GREENE STREET CARLSBAD NM 88220</b>	Address <b>P O BOX 50250 MIDLAND TX 79710-0250</b>
Telephone <b>575-234-5958</b>	Attention
Inspector <b>GREGSTON</b>	Attn Addr

Site Name <b>US 13 FEDERAL</b>	Well or Facility <b>2</b>	1/4 1/4 Section <b>SENE 13</b>	Township <b>22S</b>	Range <b>24E</b>	Meridian <b>NMP</b>	County <b>EDDY</b>	State <b>NM</b>
Site Name	Well or Facility	1/4 1/4 Section	Township	Range	Meridian	County	State
Site Name	Well or Facility	1/4 1/4 Section	Township	Range	Meridian	County	State

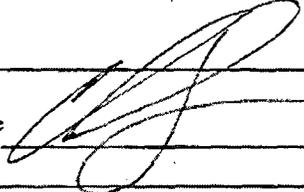
The following condition(s) were found by Bureau of Land Management Inspectors on the date and at the site(s) listed above.

Date	Time (24-hour clock)	Corrective Action to be Completed by	Date Corrected	Authority Reference
11/07/2012	15:20	12/07/2012		43 CFR 3162.7-1 (d), 43 CFR 3162.1(a), 43 CFR 3162.5-1(a), 43 CFR 3162.5-1(b), 43 CFR 3162.5-1(c)

**Remarks:**

This location and associated infrastructure released 1,743 barrels in a critical cave/karst area in an 18 month period. As requested in an email to the operator dated 11/02/11, OXY shall submit a spill prevention and improved maintenance plan with specific actions, increased maintenance/testing measures, and/or equipment replacement that will be implemented to prevent future large spills from occurring in a critical cave/karst area from this well location, associated facility, and associated infrastructure. If you have any questions, contact Terry Gregston, (575) 361-2635.

When the Written Order is complied with, sign this notice and return to above address.

Company Representative Title HES SPECIALIST Signature  Date 11-19-12  
Company Comments See Attached Sheet

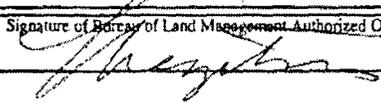
### Warning

The Authorized Officer has authority to issue a Written Order in accordance with 43 CFR 3161.2. Written Order correction and reporting time frames begin upon receipt of this Notice or 7 business days after the date it is mailed, whichever is earlier. Each stipulation must be corrected within the prescribed time from receipt of this Notice and reported to the Bureau of Land Management Office at the address shown above. If you do not comply as noted above under "Corrective Action to be Completed by", you shall be issued an Incident of Noncompliance (INC) in accordance with 43 CFR 3163.1(a). Failure to comply with the INC may result in assessments as outlined in 43 CFR 3163.1 and may also incur civil penalties (43 CFR 3163.2). All self-certified corrections must be postmarked no later than the next business day after the prescribed time frame for correction.

Section 109(d)(1) of the Federal Oil and Gas Royalty Management Act of 1982, as implemented by the applicable provisions of the operating regulations at Title 43 CFR 3163.2(f)(1), provides that any person who "knowingly or willfully" prepares, maintains, or submits false, inaccurate, or misleading reports, notices, affidavits, records, data, or other written information required by this part shall be liable for a civil penalty of up to \$25,000 per violation for each day such violation continues, not to exceed a maximum of 20 days.

### Review and Appeal Rights

A person contesting a decision shall request a State Director review of the Written Order. This request must be filed within 20 working days of receipt of the Notice with the appropriate State Director (see 43 CFR 3165.3). The State Director review decision may be appealed to the Interior Board of Land Appeals, 801 North Quincy Street, Suite 300, Arlington, VA 22203 (see 43 CFR 3165.4). Contact the above listed Bureau of Land Management office for further information.

Signature of Bureau of Land Management Authorized Officer 	Date <u>11/07/12</u>	Time <u>15:40</u>
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### FOR OFFICE USE ONLY

Number <b>51</b>	Date	Type of Inspection <b>ES</b>
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## Bratcher, Mike, EMNRD

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**From:** Christopher\_Jones@oxy.com  
**Sent:** Tuesday, March 05, 2013 7:45 AM  
**To:** Bratcher, Mike, EMNRD  
**Subject:** US 13 Fed #2

Mike, this site has been on the books for some time, I know that there was spill on top of spill. We had received an approved plan from you but could never get BLM to concur until lately. However after visiting this site the vegetation that was in question by the BLM being killed because of the spill has recovered and we have determined that the vegetation problems were due to the drought as vegetation going up the hill where no spill or fluids touched looked the same. With the new growth and the continued growth in that area I would hate to go in and tear all of that out and destroy the root system of the plants and brush. That being said I would like for us to put this area in a monitoring stage instead of going ahead with the original cleanup plan. We can go forward with that plan if you think that would be better but after looking at it I think we would be doing more harm than good. Let me know your thoughts as it pertains to this issue asap as we can move forward either way. Thanks.

Chris Jones  
HES Specialist  
Permian Primary Production  
Carlsbad, NM  
Cell 575-499-3337  
Off 575-628-4121

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our ancestors; we borrow it from  
our children." Chief Seattle

## Bratcher, Mike, EMNRD

---

**From:** Bratcher, Mike, EMNRD  
**Sent:** Tuesday, September 10, 2013 8:49 AM  
**To:** 'Christopher\_Jones@oxy.com'  
**Subject:** RE: Closure

Chris,

The biggest issue I see for this release, just looking at the analytical data, is one spot that had some fairly high hydrocarbon numbers. (TPH 19,700 @ surface - most of it was DRO and then went to 5500 @ 6"). It looks like this area was right around the cluster of flowlines as they come out (or go under) the road on I believe the north side. Do you know if any of that was removed? The proposal was to attempt removal to 1' in that area. Cliff and I discussed this release and I believe he had indicated that the 1' excavation may not be achievable in this area due to lines and in most areas out there, you hit rock fairly shallow. I would need something in the closure report to address that area, then if Jim is good with the re-veg, I would be ok with it.

I also have another open C-141 for this site - 2RP-726 was an 80 bbl release in Feb 2010. Elke environmental did the investigation on it and got low chloride and TPH numbers, and mentioned encountering rock within 1'-2'. We could close this one with a C-141 final requesting closure based on low numbers and shallow rock. I have a copy of the Elke report, it just hasn't been imaged yet.

There was also a large volume release (around 1600 bbls) out there in later 2010. The C-141 was submitted as initial and final, and accepted for record. It stated a water sample was taken and reported analysis for chloride was around 1600 - 1700 ppm. Not sure if this was a field test @ ppm or lab test, which should have been reported in mg/L. Either way, it seems the produced water is relatively low in chloride content. This C-141 stated the area would be monitored for re-veg. It is not open in our system, but if you wanted to mention in the closure for one of the other releases, that the area has re-veg, and refer to this release specifically, it would clear things up in the well file for this site if someone is looking at it down the road. There was never an RP number assigned to this release, but all of the C-141s are in the well file. 30-015-34272

Let me know if you need anything from me or want to discuss any of this. It would be a good thing to get all of these closed out.

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

-----Original Message-----

From: [Christopher Jones@oxy.com](mailto:Christopher_Jones@oxy.com) [mailto:[Christopher\\_Jones@oxy.com](mailto:Christopher_Jones@oxy.com)]  
Sent: Monday, September 09, 2013 4:37 PM  
To: Bratcher, Mike, EMNRD  
Subject: Fwd: Closure

Mike as you can see from my corresponding email with Jim I am hoping that you would go along with closing this site out. Please let me know what you think.

Chris Jones  
HES Specialist  
Permian Primary Production  
Carlsbad, NM  
Cell 575-499-3337  
Off 575-628-4121

"We do not inherit the earth from our ancestors; we borrow it from our children." Chief Seattle

Begin forwarded message:

From: "Amos, James" <[jamos@blm.gov](mailto:jamos@blm.gov)<<mailto:jamos@blm.gov>>>  
Date: September 9, 2013, 4:13:59 PM MDT  
To: "Jones, Christopher K" <[Christopher\\_Jones@oxy.com](mailto:Christopher_Jones@oxy.com)<[mailto:Christopher\\_Jones@oxy.com](mailto:Christopher_Jones@oxy.com)>>  
Subject: Re: Closure

Chris,

I did look at the multiple spills associated with the US 13 Federal #2 well. I am good for closing out the releases. The Chloride levels do not appear to be a big issue, can only see the locations improve. I did have some issues with the location. Plastic catchments with fluids and no netting. Some minor trash and scrap around the adjacent pasture .Need to address.

Thanks

On Mon, Sep 9, 2013 at 3:27 PM, <[Christopher\\_Jones@oxy.com](mailto:Christopher_Jones@oxy.com)<[mailto:Christopher\\_Jones@oxy.com](mailto:Christopher_Jones@oxy.com)>> wrote:  
Jim, I also went and looked at the US 13 Fed #2 site again, I had asked you a while back for closure here as well. The growth is even better now than it was the last time I looked. You had said that you were going to look at this site and get back with me. Please let me know what you think.

Chris Jones  
HES Specialist  
Permian Primary Production  
Carlsbad, NM  
Cell 575-499-3337  
Off 575-628-4121

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James A. Amos  
Bureau of Land Management  
Carlsbad Field Office  
Supervisory Environmental Protection Specialist  
620 East Greene Street  
Carlsbad, NM. 88220  
Office: (575) 234-5909  
Fax: (575) 234-5927  
Cell: (575) 361-2648  
E-mail: [jamos@blm.gov](mailto:jamos@blm.gov)<<mailto:jamos@blm.gov>>

## Bratcher, Mike, EMNRD

---

**From:** Christopher\_Jones@oxy.com  
**Sent:** Wednesday, November 27, 2013 10:42 AM  
**To:** Bratcher, Mike, EMNRD; Warren, JeanMarie, EMNRD  
**Cc:** jamos@blm.gov; jvancure@blm.gov  
**Subject:** Fwd: US Fed 13-2  
**Attachments:** Lab Analysis 11-8-13.pdf; ATT00001.htm; Lab Summary 11-8-13.xlsx; ATT00002.htm

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

As discussed several months ago requesting closure at this site you expressed concern at the spill area around the pipes and heavy contaminated area. We resampled the area and we are clean. We would like permission to close these spills that are open for this location.

Chris Jones  
HES Specialist  
Permian Primary Production  
Carlsbad, NM  
Cell 575-499-3337  
Off 575-628-4121

"We do not inherit the earth from our ancestors; we borrow it from our children." Chief Seattle

Begin forwarded message:

From: Kathy Purvis <kathy@bbcinternational.com<mailto:kathy@bbcinternational.com>>  
Date: November 27, 2013, 9:37:36 AM MST  
To: "Jones, Christopher K" <Christopher\_Jones@oxy.com<mailto:Christopher\_Jones@oxy.com>>  
Cc: "kswinney@bbcinternational.com<mailto:kswinney@bbcinternational.com>"  
<kswinney@bbcinternational.com<mailto:kswinney@bbcinternational.com>>,  
"cbrunson@bbcinternational.com<mailto:cbrunson@bbcinternational.com>"  
<cbrunson@bbcinternational.com<mailto:cbrunson@bbcinternational.com>>,  
"jgilkey@bbcinternational.com<mailto:jgilkey@bbcinternational.com>"  
<jgilkey@bbcinternational.com<mailto:jgilkey@bbcinternational.com>>  
Subject: US Fed 13-2

Attached are the lab analysis and summary for the final sample at the US Federal 13-2 per your request.

Kathy Purvis  
BBC International, Inc.  
1324 W. Marland  
Hobbs, NM 88240  
Phone: (575) 397-6388  
Fax: (575) 397-0397  
Email: [kathy@bbcinternational.com](mailto:kathy@bbcinternational.com)<mailto:kathy@bbcinternational.com>

November 14, 2013

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: US 13 FED #2

Enclosed are the results of analyses for samples received by the laboratory on 11/11/13 10:45.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. 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,



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: 11/11/2013  
 Reported: 11/14/2013  
 Project Name: US 13 FED #2  
 Project Number: NONE GIVEN  
 Project Location: INDIAN BASIN

 Sampling Date: 11/08/2013  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: SP 2 @ 6 IN. (H302740-01)**

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	11/13/2013	ND	1.66	83.0	2.00	12.6	
Toluene*	<0.050	0.050	11/13/2013	ND	1.68	84.2	2.00	11.8	
Ethylbenzene*	<0.050	0.050	11/13/2013	ND	1.69	84.7	2.00	11.9	
Total Xylenes*	<0.150	0.150	11/13/2013	ND	5.13	85.4	6.00	10.6	
Total BTEX	<0.300	0.300	11/13/2013	ND					

Surrogate: 4-Bromofluorobenzene (PIL) 105 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	11/13/2013	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	11/12/2013	ND	199	99.4	200	7.54	
DRO >C10-C28	<10.0	10.0	11/12/2013	ND	186	92.9	200	7.14	

Surrogate: 1-Chlorooctane 99.2 % 65.2-140

Surrogate: 1-Chlorooctadecane 111 % 63.6-154

Cardinal Laboratories

\* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

### Notes and Definitions

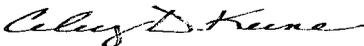
- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- \*\* Samples not received at proper temperature of 6°C or below.
- \*\*\* Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C  
Samples reported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

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Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



# CARDINAL LABORATORIES

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

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

1 of 1

Page 4 of 4

Company Name: BBC International, Inc.		<b>BILL TO</b>		<b>ANALYSIS REQUEST</b>											
Project Manager: Cliff Brunson		P.O. #:													
Address: P.O. Box 805		Company:													
City: Hobbs State: NM Zip: 88241		Attn:													
Phone #: 575-397-6388 Fax #: 575-397-0397		Address:													
Project #: Project Owner: <i>OKY</i>		City:													
Project Name: <i>US Fed 13-2</i>		State: <i>Same</i> Zip:													
Project Location: <i>Indian Basin</i>		Phone #:													
Sampler Name: <i>Gas of 12th</i>		Fax #:													

FOR LAB USE ONLY		(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						PRESERV.		SAMPLING															
Lab I.D.	Sample I.D.			GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE / COOL	OTHER:	DATE	TIME													
<i>H3027130</i>	<i>1SP20 6in</i>	<i>6</i>	<i>2</i>		<i>X</i>					<i>X</i>	<i>11-8-13</i>	<i>11:00pm</i>	<i>CL</i>	<i>TPH</i>	<i>B-TEX</i>												
<i>130</i>				<i>11/11/13</i>								<i>END</i>															

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By:	Date: <i>11-11-13</i> Time: <i>8:10</i>	Received By:	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
Relinquished By:	Date: <i>11/11/13</i> Time: <i>10:45</i>	Received By: <i>Jodi Benson</i>	Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Delivered By: (Circle One) Sampler - UPS - Bus - Other: <i>5.20</i>	Sample Condition Cool <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Intact <input type="checkbox"/> Yes <input type="checkbox"/> No	CHECKED BY:	REMARKS:	

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

#54

**Laboratory Analytical Results Summary**  
**US Federal 13-2**

		<b>Sample</b>	<b>SP2 @ 6"</b>
<b>Analyte</b>	<b>Method</b>	<b>Date</b>	11/8/13
			mg/Kg
<b>Benzene</b>	BTEX 8021B		<0.050
<b>Toluene</b>	BTEX 8021B		<0.050
<b>Ethylbenzene</b>	BTEX 8021B		<0.050
<b>Total Xylenes</b>	BTEX 8021B		<0.150
<b>Total BTEX</b>	BTEX 8021B		<0.300
<b>Chloride</b>	SM4500Cl-B		<16.0
<b>GRO</b>	TPH 8015M		<10.0
<b>DRO</b>	TPH 8015M		<10.0