

Bratcher, Mike, EMNRD

From: Cliff P. Brunson <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
Attachments: Closure Packet, US Fed 13-2.pdf

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
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World-Wide Environmental Specialists
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Kathy Purvis

From: Ken Swinney <kswinney@bbcinternational.com>
Sent: Thursday, January 02, 2014 9:35 AM
To: Kathy Purvis
Subject: FW: Closure

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

From: Christopher_Jones@oxy.com [mailto:Christopher_Jones@oxy.com]
Sent: Tuesday, September 10, 2013 9:26 AM
To: cbrunson@bbcinternational.com; kswinney@bbcinternational.com
Subject: Fwd: Closure

What do y'all 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: "Bratcher, Mike, EMNRD" <mike.bratcher@state.nm.us<mailto:mike.bratcher@state.nm.us>>
Date: September 10, 2013, 8:48:31 AM MDT
To: "Jones, Christopher K" <Christopher_Jones@oxy.com<mailto: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]
Sent: Monday, September 09, 2013 4:37 PM
To: Bratcher, Mike, EMNRD
Subject: Fwd: Closure

Mike as you can see from my coresponding 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>>
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>> 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

"We do not inherit the earth from
our ancestors; we borrow it from
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James A. Amos
Bureau of Land Management
Carlsbad Field Office
Supervisory Environmental Protection Specialist
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Fax: (575) 234-5927
Cell: (575) 361-2648
E-mail: jamos@blm.gov<mailto:jamos@blm.gov><mailto:jamos@blm.gov>

Laboratory Analytical Results Summary
US Federal 13-2

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



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

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.

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

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style.

Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

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

 Received: 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		

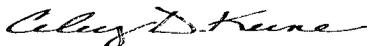
Surrogate: 1-Chlorooctane 99.2 % 65.2-140

Surrogate: 1-Chlorooctadecane 111 % 63.6-154

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

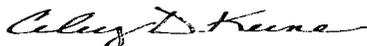
Notes and Definitions

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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*=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.		BILL TO		ANALYSIS REQUEST											
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: OKU		City:													
Project Name: US Fed 13-2		State: Zip:													
Project Location: Indian Basin		Phone #:													
Sampler Name: Gary City		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														
H302738	1 SP 2 @ 6 in	6	2		X					X		11-8-13	11:00pm	CL	X	TPH	X	B-TEX										
1540 11/11/13												1540 11/11/13																

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

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

#54