

## Bratcher, Mike, EMNRD

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**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  
President  
BBC International, Inc.  
World-Wide Environmental Specialists  
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## Kathy Purvis

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**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 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>>  
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  
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>

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

		Sample	SP2 @ 6"
Analyte	Method	Date	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

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	

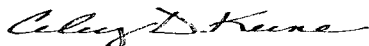
Surrogate: 1-Chlorooctane 99.2 % 65.2-140

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**

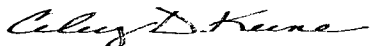
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received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

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\*=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 #:				City:																									
Project Name: US Fed 13-2				State:																									
Project Location: Indian Basin				Zip:																									
Sampler Name: Gorg City				Phone #:																									
Fax #:																													
FOR LAB USE ONLY				MATRIX				PRESERV.		SAMPLING																			
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE / COOL	OTHER:	DATE	TIME															
H3027138	1 SP 2 @ 6 in	6	2			X							11-8-13	11:00pm	X	X	X												
KAD 11/11/13												KAD 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 Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #: Add'l Fax #:
Relinquished By: [Signature]	Date: 11/11/13 Time: 10:45	Received By: Jodi Benson	REMARKS:
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	5.20	Sample Condition Cool Intact <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> No <input type="checkbox"/> Yes	
CHECKED BY: [Signature]			

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

#54