

# Closure Report

## Site Description

Site Name:	Sterling Silver 3 Federal #6 CTB
Company:	Oxy USA Inc.
Legal Description:	U/L F, Section 3, T24S, R31E
County:	Eddy County, NM
GPS Coordinates:	N 32.24825 W-103.76642

## Release Data

Date of Release:	06/15/2017
Type of Release:	Produced water
Source of Release:	Compromised poly line
Volume of Release:	25 bbls
Volume Recovered:	0 bbls

## Remediation Specifications

Remediation Parameters:	Excavated the areas of SP1-SP5 to a depth of 1 foot. Excavated the areas of SP6 & SP7 to a depth of 3 feet. Excavated the areas of SP8-SP10 to a depth of 4 feet and placed a liner in this excavation. Backfilled the site with clean soil.	
Remediation Activities:	06/28/2018 to 08/07/2018	
Plan Sent to OCD:	11/25/2017	Email from Cliff Brunson to Mike Bratcher
OCD Approval of Plan:	03/05/2018	Email from Mike Bratcher to Cliff Brunson
Plan Sent to BLM:	11/25/2017	Email from Cliff Brunson to Shelly Tucker
BLM Approval of Plan:	12/27/2017	Email from Shelly Tucker to Cliff Brunson

## Supporting Documentation

Initial C-141	Signed 06/20/2017
Final C-141	Upon completion
Site Diagram	June 2017
Groundwater Plot	375'
TOPO Maps	June 2017
Lab Summary	08/22/2007-08/24/2017
Lab Analysis	08/22/2017-08/24/2017
Correspondence	Request and approval of remediation plan via email

## Request for Closure

Based on the completion of the remediation plan, Oxy requests closure approval from NMOCD.

Wade Dittrich, Environmental Specialist

08/09/2018

**NM OIL CONSERVATION**  
ARTESIA DISTRICT

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

JUN 20 2017

Form C-141  
Revised April 3, 2017

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

RECEIVED Copy to appropriate District Office in accordance with 19.15.29 NMAC.

**Release Notification and Corrective Action**

*DAB1717251501*

**OPERATOR**  Initial Report  Final Report

Name of Company <i>OXY USA INC</i>	Contact <i>110696</i> CASEY L SUMMERS
Address PO BOX 4294; HOUSTON, TX 77210	Telephone No. 575-513-8289
Facility Name STERLING SILVER 3 FED 6 CTB	Facility Type BATTERY

Surface Owner: Federal Mineral Owner: Federal API No. 30-015-27638

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
F	3	24S	31E					EDDY

Latitude 32.2481995 Longitude -103.7667236 NAD83

**NATURE OF RELEASE**

Type of Release <b>PRODUCED WATER</b>	Volume of Release 25 bbls	Volume Recovered 0 bbls
Source of Release 3 inch poly line from water transfer pump	Date and Hour of Occurrence 6-15-2017	Date and Hour of Discovery 6-16-2017
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? MIKE BRATCHER-NMOCD; CRYSTAL WEAVER-NMOCD; SHELLY TUCKER-BLM	
By Whom? CASEY L SUMMERS	Date and Hour 6-16-2017 @ 12:47PM	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

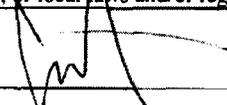
Describe Cause of Problem and Remedial Action Taken.\*

Spill was caused by a failure in a 3 inch poly line from the water transfer pump. Total volume spill was 25 bbls, with no fluid recovered (sandy area). Line was repaired and returned to service.

Describe Area Affected and Cleanup Action Taken.\*

The affected area from the spill is 40 by 40 ft (measurements are subject to change with future GPS track). Remediation will be completed in accordance with a remediation plan approved by the NMOCD and BLM.

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. In 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.

Signature: 	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: CASEY L SUMMERS	Signed By:  Approved by Environmental Specialist	
Title: ENVIRONMENTAL ADVISOR	Approval Date: 6/21/17	Expiration Date: NIA
E-mail Address: casey_summers@oxy.com	Conditions of Approval: <i>See attached</i>	Attached <input type="checkbox"/>
Date: 6-20-17 Phone: 575-513-8289		

\* Attach Additional Sheets If Necessary

*2RP-4261*

Operator/Responsible Party,

The OCD has received the form C-141 you provided on 6/20/17 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 2PP-4241 has been assigned. **Please refer to this case number in all future correspondence.**

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

*The responsible person shall complete division-approved corrective action for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]*

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. **As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District 2 office in ARTESIA on or before 7/20/17. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.**

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.
- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.
- Nominal detection limits for field and laboratory analyses must be provided.
- Composite sampling is not generally allowed.
- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

- Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

- If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

- Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

**Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.**

**Jim Griswold**

OCD Environmental Bureau Chief

1220 South St. Francis Drive

Santa Fe, New Mexico 87505

505-476-3465

[jim.griswold@state.nm.us](mailto:jim.griswold@state.nm.us)

## Bratcher, Mike, EMNRD

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**From:** Casey\_Summers@oxy.com  
**Sent:** Tuesday, June 20, 2017 3:33 PM  
**To:** Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD; stucker@blm.gov  
**Cc:** cbrunson@bbcinternational.com; kswinney@bbcinternational.com; kathy@bbcinternational.com; Jennifer\_Smith@oxy.com; jgilkey@bbcinternational.com; Wade\_Dittrich@oxy.com  
**Subject:** RE: STERLING SILVER 3 FEDERAL 6 CTB  
**Attachments:** STERLING SILVER 3 FED 6 CTB - INITIAL C-141.pdf

All,  
Please find the initial C141 for the below release attached.

Let me know if you have any questions.

Casey Summers  
O: (575)-628-4152  
C: (575)-513-8289

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**From:** Summers, Casey L  
**Sent:** Friday, June 16, 2017 11:47 AM  
**To:** 'Bratcher, Mike, EMNRD' <mike.bratcher@state.nm.us>; 'Weaver, Crystal, EMNRD' <Crystal.Weaver@state.nm.us>; 'Tucker, Shelly' <stucker@blm.gov>  
**Cc:** 'Cliff Brunson' <cbrunson@bbcinternational.com>; 'Ken Swinney' <kswinney@bbcinternational.com>; 'Kathy Purvis' <kathy@bbcinternational.com>; Smith, Jennifer A <Jennifer\_Smith@oxy.com>; Jennifer Gilkey <jgilkey@bbcinternational.com>; Dittrich, John W (Ervin Well Site Consultants) <Wade\_Dittrich@oxy.com>  
**Subject:** STERLING SILVER 3 FEDERAL 6 CTB

All,  
This is to inform you that Oxy Permian had a recordable release in Eddy County at the STERLING SILVER 3 FEDERAL 6 CTB on 6/15/2017.

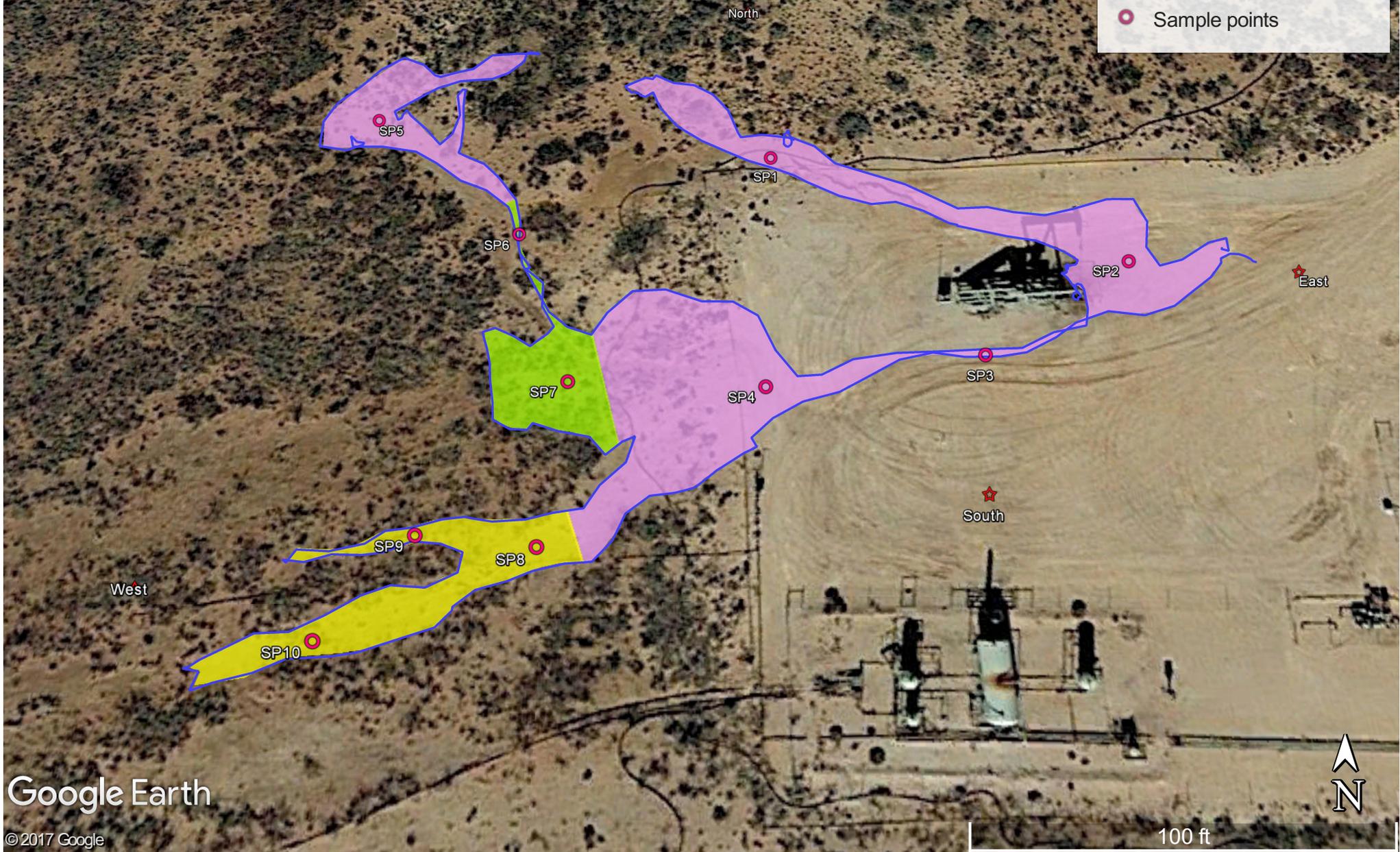
- **Release Location:** Legal F-03-24S-31E, API#30-015-27638
- **Release Volume:** 0 bbl of Oil and 25 bbls of Produced Water.
- **Recovered:** 0 bbls of total fluid recovered
- **Cause of Release:** 3 INCH POLY LINE FROM WATER TRANSFER PUMP
- **Approximate Area impacted by release:** SURFACE AREA 40x40 FT (measurements are subject to change with future GPS track)
- **GPS Coordinates and Driving Direction:** 32.2481995,-103.7667236, COMING FROM JAL NM TAKE HWY 128 TO MM17 TURN LEFT JUST AFTER MM17 AT THE PORTA JOHN GO STRAIGHT AND TURN RIGHT AT THE T THEN GO TO A 2 TRACK LEASE ROAD AND FOLLOW IT TO THE NEXT T AND GO LEFT CROSSING A CATTLE GUARD AND TURN LEFT THE LOCATION IS ON THE RIGHT

# Oxy, Sterling Silver 3 Federal #6 CTB

Leak date: 06/15/2017  
Eddy County, NM  
API# 30-015-27638  
2RP-4261

### Legend

- 1 ft Excavation
- 3 ft Excavation
- 4 ft Excavation with liner
- Cardinal sample points
- Leak Area
- Sample points



Google Earth

© 2017 Google

100 ft

Oxy, Sterling Silver 3 Federal #6 CTB

Sample points, hand auger

SP1, N 32.24835 W-103.76704

SP2, N 32.24824 W-103.76670

SP3, N 32.24816 W-103.76685

SP4, N 32.24813 W-103.76705

SP5, N 32.24840 W-103.76743

SP6, N 32.24828 W-103.76728

SP7, N 32.24814 W-103.76723

SP8, N 32.24800 W-103.76725

SP9, N 32.24800 W-103.76735

SP10, N 32.24793 W-103.76742

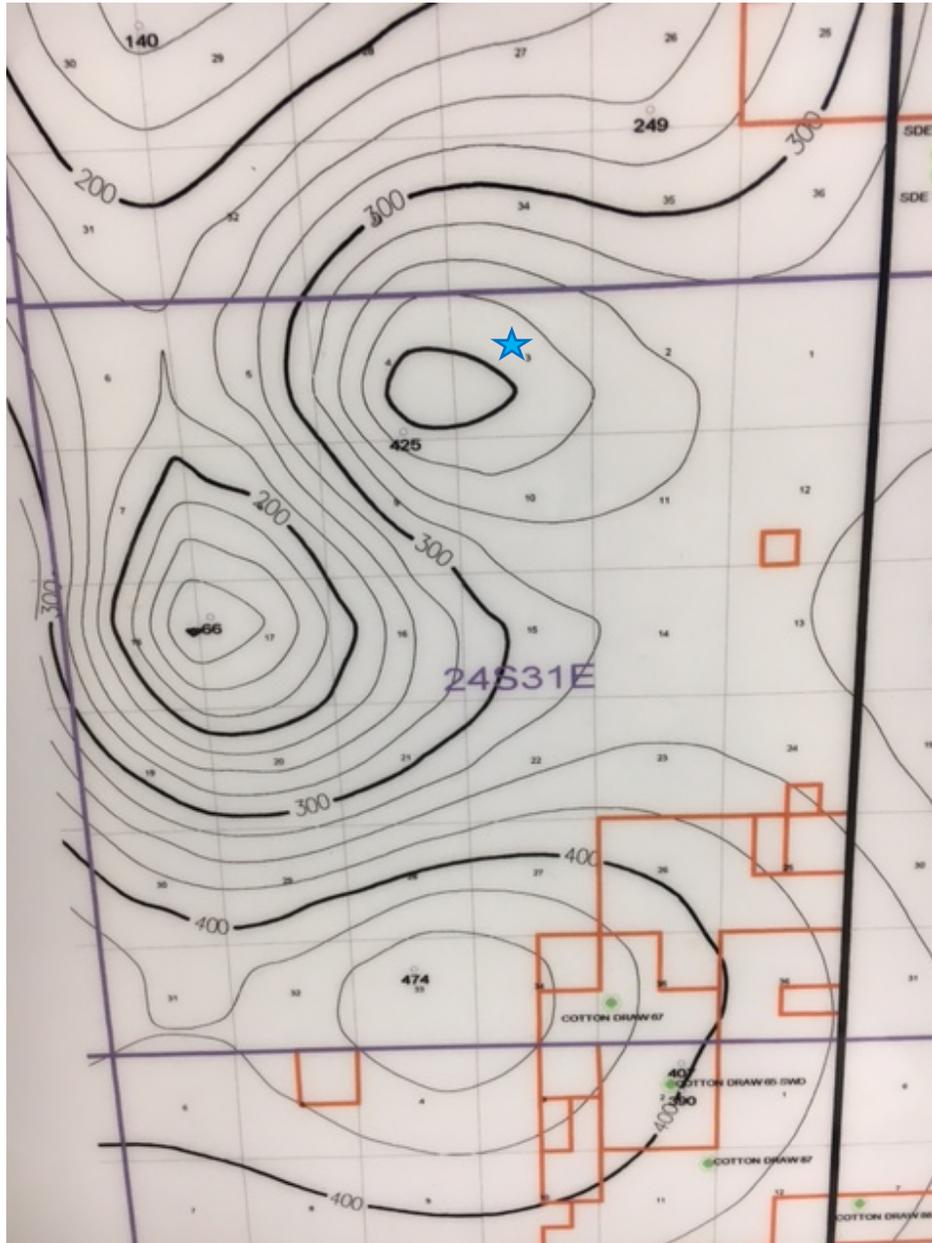
NORTH, N 32.24853 W-103.76706

SOUTH, N 32.24804 W-103.76686

EAST, N 32.24824 W-103.76654

WEST, N 32.24797 W-103.76758

**Oxy, Sterling Silver 3 Federal #6 CTB**  
**U/L F, Section 3, T24S, R31E**  
**Groundwater: 375'**





# New Mexico Office of the State Engineer

## Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced,  
O=orphaned,  
C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

POD Number	Code	POD Sub-basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Distance	DepthWell	DepthWater	Water Column
<a href="#">C_02464</a>		C	ED	3	4	1	02	24S	31E	617589	3568530*	<input type="checkbox"/>	1510	320	205 115
<a href="#">C_02460</a>		C	ED			3	02	24S	31E	617496	3568022*	<input type="checkbox"/>	1532	320	
<a href="#">C_02460 POD2</a>		C	ED			3	02	24S	31E	617496	3568022*	<input type="checkbox"/>	1532	320	
<a href="#">C_02405</a>		C	ED	4	1	02		24S	31E	617690	3568631*	<input type="checkbox"/>	1609	275	160 115
Average Depth to Water:														<b>182 feet</b>	
Minimum Depth:														<b>160 feet</b>	
Maximum Depth:														<b>205 feet</b>	

**Record Count:** 4

**UTMNAD83 Radius Search (in meters):**

**Easting (X):** 616081

**Northing (Y):** 3568610

**Radius:** 1700

\*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

6/26/17 9:17 AM

WATER COLUMN/ AVERAGE DEPTH TO WATER

**Public Land Survey System (PLSS)**

Q64:            Q16: SE            Q4: NW            Sec: 03            Tws: 24S            Rng: 31E

**State Plane Coordinate System - NAD27**

X:            ft            Y:            ft            Zone:

**State Plane Coordinate System - NAD83**

X:            ft            Y:            ft            Zone:

**Degrees/Minutes/Seconds**

Longitude (X):            Degrees:    °            Minutes:    '            Seconds:    "

Latitude (Y):            Degrees:    °            Minutes:    '            Seconds:    "

**UTM - NAD27**

Easting (X):            mtrs    Northing (Y):            mtrs    Zone:

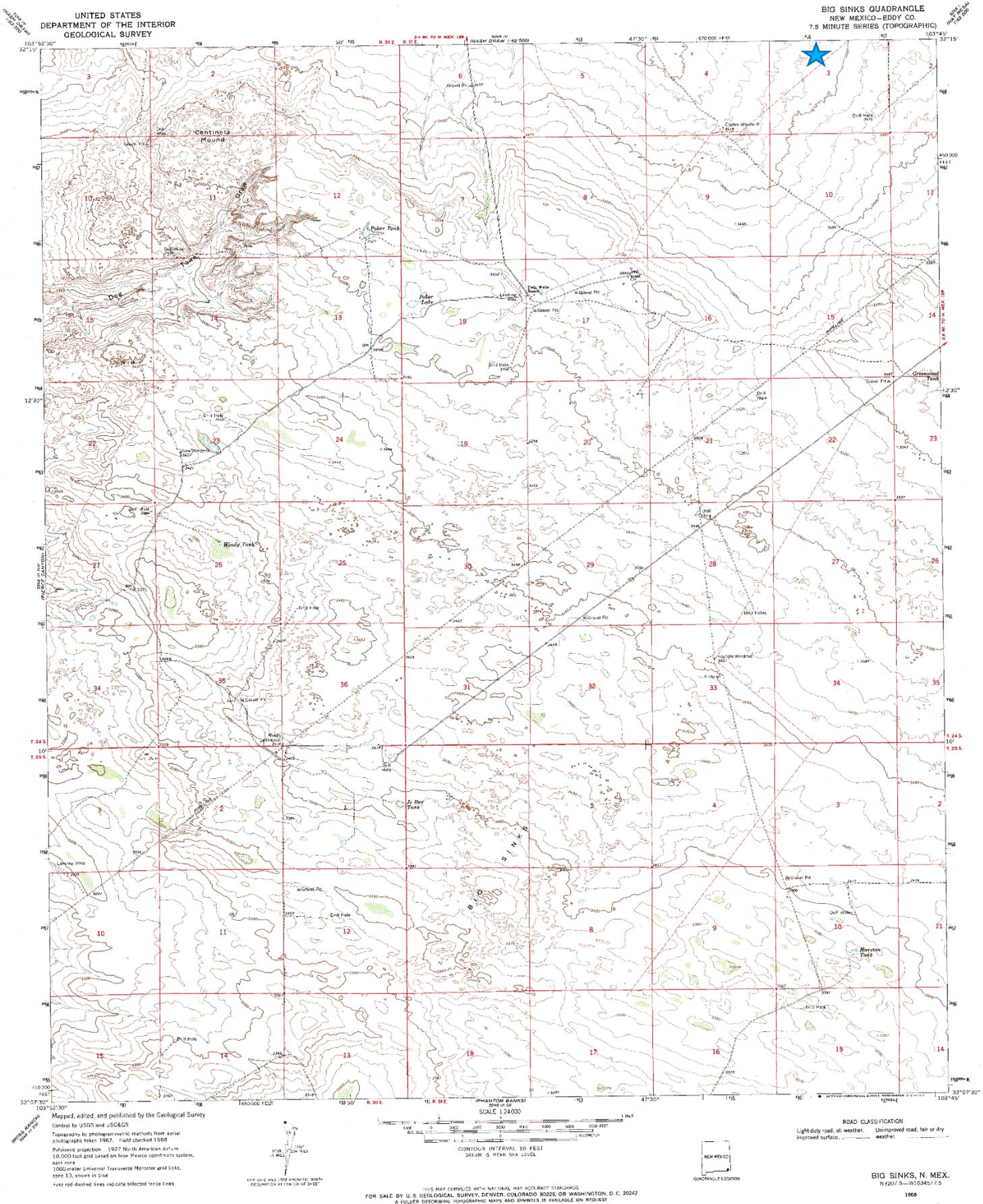
**SUBMIT**

All Conversion Results are displayed as **NAD 1983 UTM Zone 13**

Easting (X): **616081.0** mtrs            Northing (Y): **3568610.0** mtrs

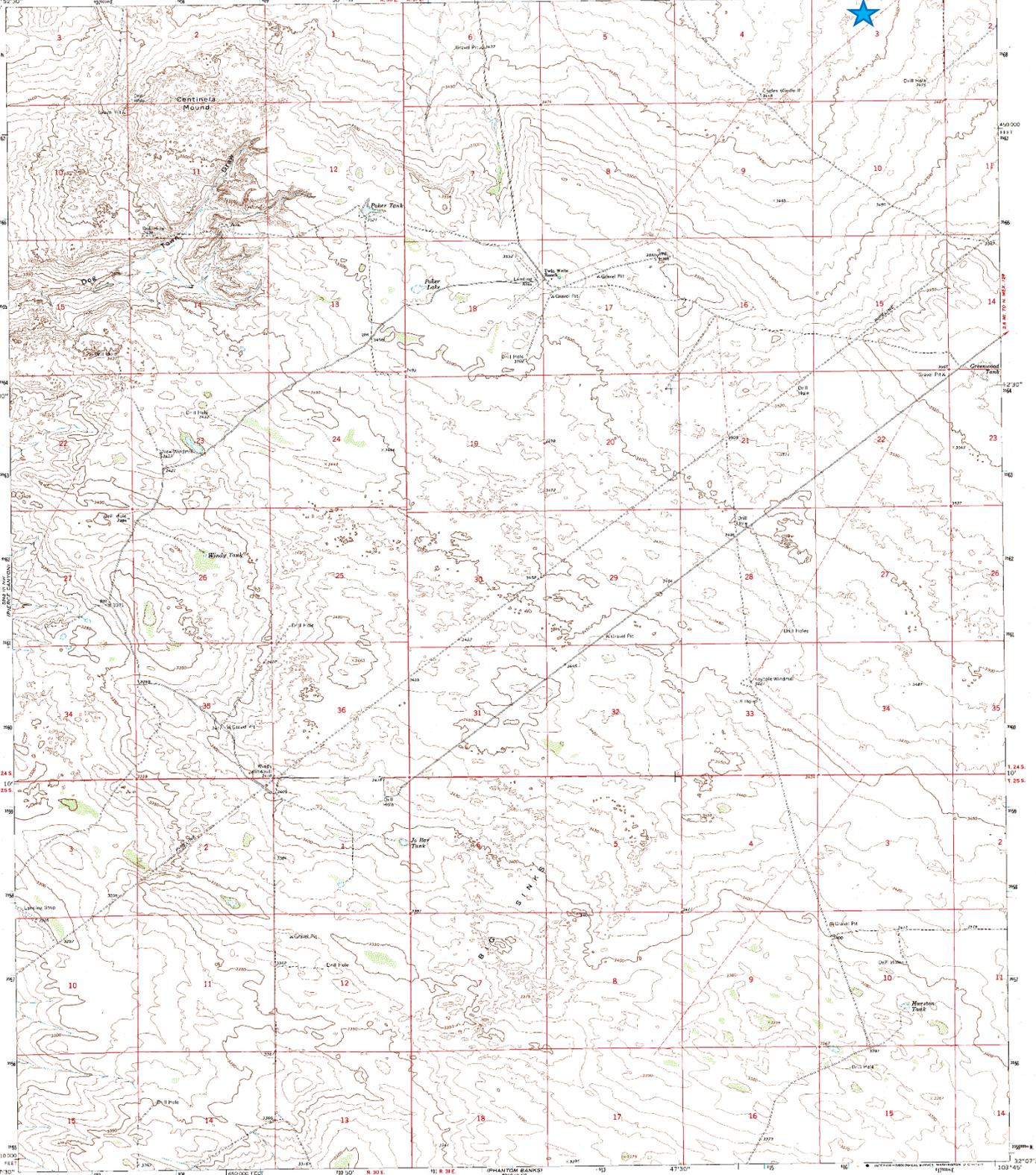
~~ Please keep screen open to copy UTM values for Reports. ~~

# Oxy, Sterling Silver 3 Federal #6 CTB



UNITED STATES  
DEPARTMENT OF THE INTERIOR  
GEOLOGICAL SURVEY

BIG SINKS QUADRANGLE  
NEW MEXICO-EDDY CO.  
7.5 MINUTE SERIES (TOPOGRAPHIC)



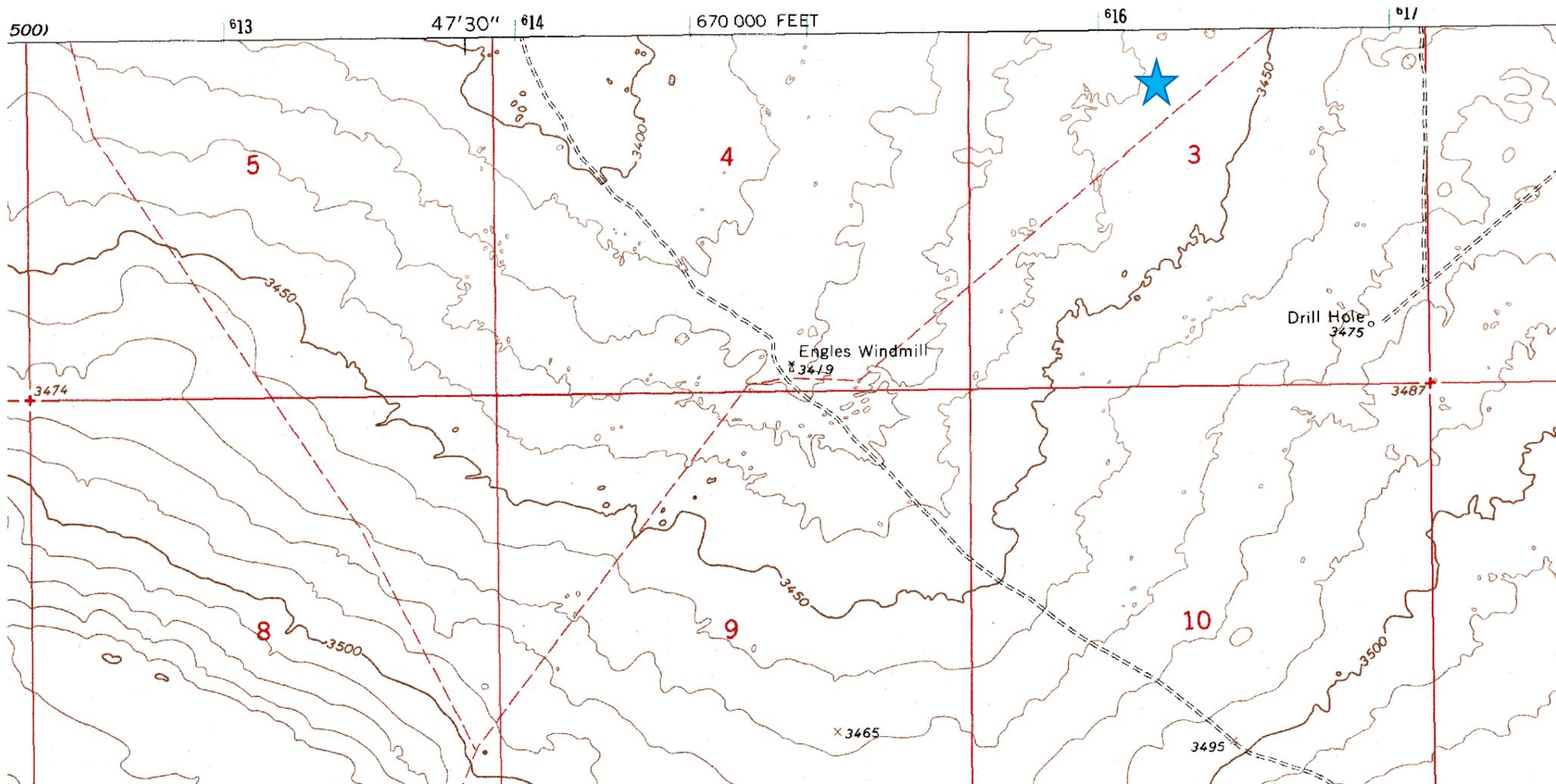
Mapped, edited, and published by the Geological Survey  
Control by USGS and USCAGS  
Topography by photogrammetric methods from aerial  
photographs taken 1967. Field checked 1968  
Polyconic projection. 1927 North American datum.  
10,000 foot grid based on New Mexico coordinate system,  
east zone.  
1000-meter Universal Transverse Mercator grid ticks,  
zone 13, shown in blue.  
Red dashed lines indicate selected fence lines.

SCALE 1:24,000  
CONTROL INTERVAL 10 FEET  
DAUM 5 MEAN SEA LEVEL

ROAD CLASSIFICATION  
Light-duty road, all-weather. Unimproved road, fair or dry  
Improved surface. weather.

BIG SINKS, N. MEX.  
N 5207.5-W10345.7/5  
1968  
AMS 2548 III NR-SERIES 7881

# Oxy, Sterling Silver 3 Federal #6 CTB



**Laboratory Analytical Results Summary  
Sterling Silver 3 Federal #6 CTB (6/15/17)**

		Sample	SP1 @ SURFACE	SP1 @ 1'	SP1 @ 6'	SP1 @ 11'
Analyte	Method	Date	8/22/17	8/22/17	8/22/17	8/22/17
			mg/Kg	mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		n/a	<0.050	n/a	n/a
Toluene	BTEX 8021B		n/a	<0.050	n/a	n/a
Ethylbenzene	BTEX 8021B		n/a	<0.050	n/a	n/a
Total Xylenes	BTEX 8021B		n/a	<0.150	n/a	n/a
Total BTEX	BTEX 8021B		n/a	<0.300	n/a	n/a
Chloride	SM4500Cl-B		48	704	176	368
GRO	TPH 8015M		n/a	<10.0	n/a	n/a
DRO	TPH 8015M		n/a	<10.0	n/a	n/a
EXT DRO	TPH 8015M		n/a	<10.0	n/a	n/a

		Sample	SP2 @ 1'	SP2 @ 2'	SP2 @ 7'	SP2 @ 12'
Analyte	Method	Date	8/22/17	8/22/17	8/22/17	8/22/17
			mg/Kg	mg/Kg	mg/Kg	mg/Kg
Chloride	SM4500Cl-B		656	288	112	480

		Sample	SP3 @ 1'	SP3 @ 2'	SP3 @ 7'	SP3 @ 12'
Analyte	Method	Date	8/22/17	8/22/17	8/22/17	8/22/17
			mg/Kg	mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.050	n/a	n/a	n/a
Toluene	BTEX 8021B		<0.050	n/a	n/a	n/a
Ethylbenzene	BTEX 8021B		<0.050	n/a	n/a	n/a
Total Xylenes	BTEX 8021B		<0.150	n/a	n/a	n/a
Total BTEX	BTEX 8021B		<0.300	n/a	n/a	n/a
Chloride	SM4500Cl-B		656	208	160	384
GRO	TPH 8015M		<10.0	n/a	n/a	n/a
DRO	TPH 8015M		<10.0	n/a	n/a	n/a
EXT DRO	TPH 8015M		<10.0	n/a	n/a	n/a

		Sample	SP4 @ 1'	SP4 @ 2'	SP4 @ 7'	SP4 @ 12'
Analyte	Method	Date	8/22/17	8/22/17	8/22/17	8/22/17
			mg/Kg	mg/Kg	mg/Kg	mg/Kg
Chloride	SM4500Cl-B		608	288	160	256

		Sample	SP5 @ 1'	SP5 @ 6'	SP5 @ 11'
Analyte	Method	Date	8/23/17	8/23/17	8/23/17
			mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.050	n/a	n/a
Toluene	BTEX 8021B		0.097	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	SM4500Cl-B		80	96	304
GRO	TPH 8015M		<50.0	n/a	n/a
DRO	TPH 8015M		1310	n/a	n/a
EXT DRO	TPH 8015M		528	n/a	n/a

		Sample	SP6 @ 1'	SP6 @ 3'	SP6 @ 7'	SP6 @ 12'	SP6 @ 15'
Analyte	Method	Date	8/23/17	8/23/17	8/23/17	8/23/17	8/23/17
			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Chloride	SM4500Cl-B		336	2680	160	208	128

		Sample	SP7 @ 1'	SP7 @ 3'	SP7 @ 7'	SP7 @ 12'	SP7 @ 15'
Analyte	Method	Date	8/23/17	8/23/17	8/23/17	8/23/17	8/23/17
			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.050	n/a	n/a	n/a	n/a
Toluene	BTEX 8021B		<0.050	n/a	n/a	n/a	n/a
Ethylbenzene	BTEX 8021B		<0.050	n/a	n/a	n/a	n/a
Total Xylenes	BTEX 8021B		<0.150	n/a	n/a	n/a	n/a
Total BTEX	BTEX 8021B		<0.300	n/a	n/a	n/a	n/a
Chloride	SM4500Cl-B		592	3040	176	240	96
GRO	TPH 8015M		<10.0	n/a	n/a	n/a	n/a
DRO	TPH 8015M		<10.0	n/a	n/a	n/a	n/a
EXT DRO	TPH 8015M		<10.0	n/a	n/a	n/a	n/a

		Sample	SP8 @ 1'	SP8 @ 8'	SP8 @ 12'	SP8 @ 15'
Analyte	Method	Date	8/24/17	8/24/17	8/24/17	8/24/17
			mg/Kg	mg/Kg	mg/Kg	mg/Kg
Chloride	SM4500Cl-B		288	8530	64	48

		Sample	SP9 @ 1'	SP9 @ 7'	SP9 @ 10'	SP9 @ 11'	SP9 @ 12'	SP9 @ 15'
Analyte	Method	Date	8/24/17	8/24/17	8/24/17	8/24/17	8/24/17	8/24/17
			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Chloride	SM4500Cl-B		288	12900	2000	80	64	48

		Sample	SP10 @ 1'	SP10 @ 6'	SP10 @ 8'	SP10 @ 12'	SP10 @ 15'
Analyte	Method	Date	8/24/17	8/24/17	8/24/17	8/24/17	8/24/17
			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Benzene	BTEX 8021B		<0.050	n/a	n/a	n/a	n/a
Toluene	BTEX 8021B		<0.050	n/a	n/a	n/a	n/a
Ethylbenzene	BTEX 8021B		<0.050	n/a	n/a	n/a	n/a
Total Xylenes	BTEX 8021B		<0.150	n/a	n/a	n/a	n/a
Total BTEX	BTEX 8021B		<0.300	n/a	n/a	n/a	n/a
Chloride	SM4500Cl-B		304	17200	10500	48	64
GRO	TPH 8015M		<10.0	n/a	n/a	n/a	n/a
DRO	TPH 8015M		<10.0	n/a	n/a	n/a	n/a
EXT DRO	TPH 8015M		<10.0	n/a	n/a	n/a	n/a

CARDINAL POINTS		Sample	NORTH @ SURFACE	WEST @ SURFACE	EAST @ SURFACE	SOUTH @ SURFACE
Analyte	Method	Date	8/22/17	8/22/17	8/22/17	8/22/17
			mg/Kg	mg/Kg	mg/Kg	mg/Kg
Chloride	SM4500Cl-B		208	192	256	160



September 05, 2017

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: STERLING SILVER 3 FEDERAL #6 CTB

Enclosed are the results of analyses for samples received by the laboratory on 08/25/17 16:52.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. 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,

A handwritten signature in black ink that reads "Celey D. Keene".

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:	08/25/2017	Sampling Date:	08/22/2017
Reported:	09/05/2017	Sampling Type:	Soil
Project Name:	STERLING SILVER 3 FEDERAL #6 CTB	Sampling Condition:	** (See Notes)
Project Number:	( 6/15/17 LEAK )	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NM		

**Sample ID: SP 1 @ SURFACE (H702265-01)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>48.0</b>	16.0	08/30/2017	ND	416	104	400	3.77	

**Sample ID: SP 1 @ 1' (H702265-02)**

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	08/31/2017	ND	1.70	85.1	2.00	5.19	
Toluene*	<0.050	0.050	08/31/2017	ND	1.65	82.7	2.00	4.53	
Ethylbenzene*	<0.050	0.050	08/31/2017	ND	1.74	86.8	2.00	3.56	
Total Xylenes*	<0.150	0.150	08/31/2017	ND	5.39	89.8	6.00	3.91	
Total BTEX	<0.300	0.300	08/31/2017	ND					

Surrogate: 4-Bromofluorobenzene (PID) 109 % 72-148

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>704</b>	16.0	08/30/2017	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	08/29/2017	ND	198	99.0	200	4.24	
DRO >C10-C28	<10.0	10.0	08/29/2017	ND	192	96.0	200	6.51	
EXT DRO >C28-C36	<10.0	10.0	08/29/2017	ND					

Surrogate: 1-Chlorooctane 113 % 28.3-164

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\*=Accredited Analyte

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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:	08/25/2017	Sampling Date:	08/22/2017
Reported:	09/05/2017	Sampling Type:	Soil
Project Name:	STERLING SILVER 3 FEDERAL #6 CTB	Sampling Condition:	** (See Notes)
Project Number:	( 6/15/17 LEAK )	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NM		

**Sample ID: SP 1 @ 1' (H702265-02)**

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<i>Surrogate: 1-Chlorooctadecane</i>	120 %	34.7-157							

**Sample ID: SP 1 @ 6' (H702265-03)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>176</b>	16.0	08/30/2017	ND	416	104	400	3.77	

**Sample ID: SP 1 @ 11' (H702265-04)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>368</b>	16.0	08/30/2017	ND	416	104	400	3.77	

**Sample ID: SP 2 @ 1' (H702265-05)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>656</b>	16.0	08/30/2017	ND	416	104	400	3.77	

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

Received:	08/25/2017	Sampling Date:	08/22/2017
Reported:	09/05/2017	Sampling Type:	Soil
Project Name:	STERLING SILVER 3 FEDERAL #6 CTB	Sampling Condition:	** (See Notes)
Project Number:	( 6/15/17 LEAK )	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NM		

**Sample ID: SP 2 @ 2' (H702265-06)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>288</b>	16.0	08/30/2017	ND	416	104	400	3.77	

**Sample ID: SP 2 @ 7' (H702265-07)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>112</b>	16.0	08/30/2017	ND	416	104	400	3.77	

**Sample ID: SP 2 @ 12' (H702265-08)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>480</b>	16.0	08/30/2017	ND	416	104	400	3.77	

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**Analytical Results For:**

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

Received:	08/25/2017	Sampling Date:	08/22/2017
Reported:	09/05/2017	Sampling Type:	Soil
Project Name:	STERLING SILVER 3 FEDERAL #6 CTB	Sampling Condition:	** (See Notes)
Project Number:	( 6/15/17 LEAK )	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NM		

**Sample ID: SP 3 @ 1' (H702265-09)**

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	08/31/2017	ND	1.70	85.1	2.00	5.19		
Toluene*	<0.050	0.050	08/31/2017	ND	1.65	82.7	2.00	4.53		
Ethylbenzene*	<0.050	0.050	08/31/2017	ND	1.74	86.8	2.00	3.56		
Total Xylenes*	<0.150	0.150	08/31/2017	ND	5.39	89.8	6.00	3.91		
Total BTEX	<0.300	0.300	08/31/2017	ND						

Surrogate: 4-Bromofluorobenzene (PID) 108 % 72-148

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Chloride</b>	<b>656</b>	16.0	08/30/2017	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	08/29/2017	ND	198	99.0	200	4.24		
DRO >C10-C28	<10.0	10.0	08/29/2017	ND	192	96.0	200	6.51		
EXT DRO >C28-C36	<10.0	10.0	08/29/2017	ND						

Surrogate: 1-Chlorooctane 107 % 28.3-164

Surrogate: 1-Chlorooctadecane 109 % 34.7-157

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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:	08/25/2017	Sampling Date:	08/22/2017
Reported:	09/05/2017	Sampling Type:	Soil
Project Name:	STERLING SILVER 3 FEDERAL #6 CTB	Sampling Condition:	** (See Notes)
Project Number:	( 6/15/17 LEAK )	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NM		

**Sample ID: SP 3 @ 2' (H702265-10)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	208	16.0	08/30/2017	ND	416	104	400	3.77	

**Sample ID: SP 3 @ 7' (H702265-11)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	160	16.0	08/30/2017	ND	416	104	400	3.77	

**Sample ID: SP 3 @ 12' (H702265-12)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	384	16.0	08/30/2017	ND	416	104	400	3.77	

**Sample ID: SP 4 @ 1' (H702265-13)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	608	16.0	08/30/2017	ND	416	104	400	3.77	

**Sample ID: SP 4 @ 2' (H702265-14)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	288	16.0	08/30/2017	ND	416	104	400	3.77	

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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:	08/25/2017	Sampling Date:	08/22/2017
Reported:	09/05/2017	Sampling Type:	Soil
Project Name:	STERLING SILVER 3 FEDERAL #6 CTB	Sampling Condition:	** (See Notes)
Project Number:	( 6/15/17 LEAK )	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NM		

**Sample ID: SP 4 @ 7' (H702265-15)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	160	16.0	08/30/2017	ND	416	104	400	3.77	

**Sample ID: SP 4 @ 12' (H702265-16)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	256	16.0	08/30/2017	ND	416	104	400	3.77	

**Sample ID: NORTH @ SURFACE (H702265-17)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	208	16.0	08/30/2017	ND	416	104	400	3.77	

**Sample ID: WEST @ SURFACE (H702265-18)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	192	16.0	08/30/2017	ND	416	104	400	3.77	

**Sample ID: EAST @ SURFACE (H702265-19)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	256	16.0	08/30/2017	ND	416	104	400	3.77	

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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:	08/25/2017	Sampling Date:	08/22/2017
Reported:	09/05/2017	Sampling Type:	Soil
Project Name:	STERLING SILVER 3 FEDERAL #6 CTB	Sampling Condition:	** (See Notes)
Project Number:	( 6/15/17 LEAK )	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NM		

**Sample ID: SOUTH @ SURFACE (H702265-20)**

Chloride, SM4500Cl-B	mg/kg	Analyzed By: AC							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>160</b>	16.0	08/30/2017	ND	416	104	400	0.00	

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 Fax To: (575) 397-0397

Received:	08/25/2017	Sampling Date:	08/23/2017
Reported:	09/05/2017	Sampling Type:	Soil
Project Name:	STERLING SILVER 3 FEDERAL #6 CTB	Sampling Condition:	** (See Notes)
Project Number:	( 6/15/17 LEAK )	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NM		

**Sample ID: SP 5 @ 1' (H702265-21)**

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	08/31/2017	ND	1.70	85.1	2.00	5.19	
<b>Toluene*</b>	<b>0.097</b>	0.050	08/31/2017	ND	1.65	82.7	2.00	4.53	
Ethylbenzene*	<0.050	0.050	08/31/2017	ND	1.74	86.8	2.00	3.56	
Total Xylenes*	<0.150	0.150	08/31/2017	ND	5.39	89.8	6.00	3.91	
Total BTEX	<0.300	0.300	08/31/2017	ND					

Surrogate: 4-Bromofluorobenzene (PID) 110 % 72-148

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>80.0</b>	16.0	08/30/2017	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS						S-06
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<50.0	50.0	08/29/2017	ND	198	99.0	200	4.24		
<b>DRO &gt;C10-C28</b>	<b>1310</b>	50.0	08/29/2017	ND	192	96.0	200	6.51		
<b>EXT DRO &gt;C28-C36</b>	<b>528</b>	50.0	08/29/2017	ND						

Surrogate: 1-Chlorooctane 99.3 % 28.3-164

Surrogate: 1-Chlorooctadecane 190 % 34.7-157

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Celey D. Keene, Lab Director/Quality Manager

**Analytical Results For:**

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

Received:	08/25/2017	Sampling Date:	08/23/2017
Reported:	09/05/2017	Sampling Type:	Soil
Project Name:	STERLING SILVER 3 FEDERAL #6 CTB	Sampling Condition:	** (See Notes)
Project Number:	( 6/15/17 LEAK )	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NM		

**Sample ID: SP 5 @ 6' (H702265-22)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	08/30/2017	ND	416	104	400	0.00	

**Sample ID: SP 5 @ 11' (H702265-23)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	304	16.0	08/30/2017	ND	416	104	400	0.00	

**Sample ID: SP 6 @ 1' (H702265-24)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	336	16.0	08/30/2017	ND	416	104	400	0.00	

**Sample ID: SP 6 @ 3' (H702265-25)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2680	16.0	08/30/2017	ND	416	104	400	0.00	

**Sample ID: SP 6 @ 7' (H702265-26)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	160	16.0	08/30/2017	ND	416	104	400	0.00	

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\*=Accredited Analyte

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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:	08/25/2017	Sampling Date:	08/23/2017
Reported:	09/05/2017	Sampling Type:	Soil
Project Name:	STERLING SILVER 3 FEDERAL #6 CTB	Sampling Condition:	** (See Notes)
Project Number:	( 6/15/17 LEAK )	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NM		

**Sample ID: SP 6 @ 12' (H702265-27)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>208</b>	16.0	08/30/2017	ND	416	104	400	0.00	

**Sample ID: SP 6 @ 15' (H702265-28)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>128</b>	16.0	08/30/2017	ND	416	104	400	0.00	

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**Analytical Results For:**

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

Received:	08/25/2017	Sampling Date:	08/23/2017
Reported:	09/05/2017	Sampling Type:	Soil
Project Name:	STERLING SILVER 3 FEDERAL #6 CTB	Sampling Condition:	** (See Notes)
Project Number:	( 6/15/17 LEAK )	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NM		

**Sample ID: SP 7 @ 1' (H702265-29)**

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	08/31/2017	ND	1.70	85.1	2.00	5.19		
Toluene*	<0.050	0.050	08/31/2017	ND	1.65	82.7	2.00	4.53		
Ethylbenzene*	<0.050	0.050	08/31/2017	ND	1.74	86.8	2.00	3.56		
Total Xylenes*	<0.150	0.150	08/31/2017	ND	5.39	89.8	6.00	3.91		
Total BTEX	<0.300	0.300	08/31/2017	ND						

Surrogate: 4-Bromofluorobenzene (PID) 110 % 72-148

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Chloride</b>	<b>592</b>	16.0	08/30/2017	ND	416	104	400	0.00		

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	08/29/2017	ND	198	99.0	200	4.24		
DRO >C10-C28	<10.0	10.0	08/29/2017	ND	192	96.0	200	6.51		
EXT DRO >C28-C36	<10.0	10.0	08/29/2017	ND						

Surrogate: 1-Chlorooctane 113 % 28.3-164

Surrogate: 1-Chlorooctadecane 120 % 34.7-157

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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:	08/25/2017	Sampling Date:	08/23/2017
Reported:	09/05/2017	Sampling Type:	Soil
Project Name:	STERLING SILVER 3 FEDERAL #6 CTB	Sampling Condition:	** (See Notes)
Project Number:	( 6/15/17 LEAK )	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NM		

**Sample ID: SP 7 @ 3' (H702265-30)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	3040	16.0	08/30/2017	ND	416	104	400	0.00	

**Sample ID: SP 7 @ 7' (H702265-31)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	08/30/2017	ND	416	104	400	0.00	

**Sample ID: SP 7 @ 12' (H702265-32)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	240	16.0	08/30/2017	ND	416	104	400	0.00	

**Sample ID: SP 7 @ 15' (H702265-33)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	08/30/2017	ND	416	104	400	0.00	

**Sample ID: SP 8 @ 1' (H702265-34)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	288	16.0	08/30/2017	ND	416	104	400	0.00	

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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:	08/25/2017	Sampling Date:	08/24/2017
Reported:	09/05/2017	Sampling Type:	Soil
Project Name:	STERLING SILVER 3 FEDERAL #6 CTB	Sampling Condition:	** (See Notes)
Project Number:	( 6/15/17 LEAK )	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NM		

**Sample ID: SP 8 @ 8' (H702265-35)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>8530</b>	16.0	08/30/2017	ND	416	104	400	0.00	

**Sample ID: SP 8 @ 12' (H702265-36)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>64.0</b>	16.0	08/30/2017	ND	416	104	400	0.00	

**Sample ID: SP 8 @ 15' (H702265-37)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>48.0</b>	16.0	08/30/2017	ND	416	104	400	0.00	

**Sample ID: SP 9 @ 1' (H702265-38)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>288</b>	16.0	08/30/2017	ND	416	104	400	0.00	

**Sample ID: SP 9 @ 7' (H702265-39)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>12900</b>	16.0	08/30/2017	ND	416	104	400	0.00	

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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:	08/25/2017	Sampling Date:	08/24/2017
Reported:	09/05/2017	Sampling Type:	Soil
Project Name:	STERLING SILVER 3 FEDERAL #6 CTB	Sampling Condition:	** (See Notes)
Project Number:	( 6/15/17 LEAK )	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NM		

**Sample ID: SP 9 @ 10' (H702265-40)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>2000</b>	16.0	08/30/2017	ND	432	108	400	3.64	QM-07

**Sample ID: SP 9 @ 11' (H702265-41)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>80.0</b>	16.0	08/30/2017	ND	432	108	400	3.64	

**Sample ID: SP 9 @ 12' (H702265-42)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>64.0</b>	16.0	08/30/2017	ND	432	108	400	3.64	

**Sample ID: SP 9 @ 15' (H702265-43)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>48.0</b>	16.0	08/30/2017	ND	432	108	400	3.64	

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

Received:	08/25/2017	Sampling Date:	08/24/2017
Reported:	09/05/2017	Sampling Type:	Soil
Project Name:	STERLING SILVER 3 FEDERAL #6 CTB	Sampling Condition:	** (See Notes)
Project Number:	( 6/15/17 LEAK )	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NM		

**Sample ID: SP 10 @ 1' (H702265-44)**

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	08/31/2017	ND	1.70	85.1	2.00	5.19		
Toluene*	<0.050	0.050	08/31/2017	ND	1.65	82.7	2.00	4.53		
Ethylbenzene*	<0.050	0.050	08/31/2017	ND	1.74	86.8	2.00	3.56		
Total Xylenes*	<0.150	0.150	08/31/2017	ND	5.39	89.8	6.00	3.91		
Total BTEX	<0.300	0.300	08/31/2017	ND						

Surrogate: 4-Bromofluorobenzene (PID) 109 % 72-148

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	304	16.0	08/30/2017	ND	432	108	400	3.64		

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	08/29/2017	ND	198	99.0	200	4.24		
DRO >C10-C28	<10.0	10.0	08/29/2017	ND	192	96.0	200	6.51		
EXT DRO >C28-C36	<10.0	10.0	08/29/2017	ND						

Surrogate: 1-Chlorooctane 107 % 28.3-164

Surrogate: 1-Chlorooctadecane 113 % 34.7-157

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**Analytical Results For:**

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

Received:	08/25/2017	Sampling Date:	08/24/2017
Reported:	09/05/2017	Sampling Type:	Soil
Project Name:	STERLING SILVER 3 FEDERAL #6 CTB	Sampling Condition:	** (See Notes)
Project Number:	( 6/15/17 LEAK )	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NM		

**Sample ID: SP 10 @ 6' (H702265-45)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>17200</b>	16.0	08/30/2017	ND	432	108	400	3.64	

**Sample ID: SP 10 @ 8' (H702265-46)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>10500</b>	16.0	08/30/2017	ND	432	108	400	3.64	

**Sample ID: SP 10 @ 12' (H702265-47)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>48.0</b>	16.0	08/30/2017	ND	432	108	400	3.64	

**Sample ID: SP 10 @ 15' (H702265-48)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>64.0</b>	16.0	08/30/2017	ND	432	108	400	3.64	

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Celey D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

- S-06 The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
- QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
- 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**  
 101 East Marland, Hobbs, NM 88240  
 (505) 393-2326 FAX (505) 393-2476

**CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

**ANALYSIS REQUEST**

**BILL TO**

Company Name: BBC International, Inc. P.O. #:  
 Project Manager: Cliff Brunson Company: Oxy  
 Address: P.O. Box 805 State: NM Zip: 88241 Attn: Wade Strick  
 City: Hobbs Phone #: 575-397-6388 Fax #: 575-397-0397 Address:  
 Project #: Project Owner: Oxy City:  
 Project Name: Sterling Silver 3 Federal #6 CTB (6/15/17 leak) State: Zip:  
 Project Location: Eddy County, NM Phone #:  
 Sampler Name: Roger Hernandez Fax #:

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						DATE	TIME	CI	BTEX	TPH EXT
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :					
1	SP1 @ SURFACE	G	1							8/22/17	9:34 AM	✓		
2	SP1 @ 1'	G	1							8/22/17	9:46 AM	✓	✓	
3	SP1 @ 6'	G	1							8/22/17	9:58 AM	✓		
4	SP1 @ 11'	G	1							8/22/17	10:12 AM	✓		
5	SP2 @ 1'	G	1							8/22/17	10:26 AM	✓		
6	SP2 @ 2'	G	1							8/22/17	10:35 AM	✓		
7	SP2 @ 7'	G	1							8/22/17	10:44 AM	✓		
8	SP2 @ 12'	G	1							8/22/17	11:00 AM	✓		
9	SP3 @ 1'	G	1							8/22/17	11:11 AM	✓		
10	SP3 @ 2'	G	1							8/22/17	11:16 AM	✓		

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Relinquished By: *Robert Hardy* Date: 8/29/17 Received By: *Wade Strick*  
 Time: 5:30 pm  
 Relinquished By: *Julia Semlyk* Date: 9:05 a Time: 9:52 Received By: *Hobby Carbow*  
 Delivered By: (Circle One)  UPS  Bus  Other: 88c  
 Sample Condition:  Yes  No  
 Cool Antic:  Yes  No  
 CHECKED BY: (Initials) HC

Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476  
 Corrected 4.25.c



**ARDINAL LABORATORIES**

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

**CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

2085

**BILL TO**

**ANALYSIS REQUEST**

Company Name: BBC International, Inc.		P.O. #:	
Project Manager: Cliff Brunson		Company:	OK
Address: P.O. Box 805		Attn:	Wade Strick
City: Hobbs	State: NM Zip: 88241	Address:	
Phone #: 575-397-6388	Fax #: 575-397-0397	City:	
Project #:	Project Owner: Oxy	State:	
Project Name: Sterling Silver 3 Federal #6 CTB (6/15/17 leak)		Zip:	
Project Location: Eddy County, NM		Phone #:	
Sampler Name: Roger Hernandez		Fax #:	

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						DATE	TIME								
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :										
11	SP3 @ 7'		1							8/22/17	11:23 AM	✓							
12	SP3 @ 12'		1							8/22/17	11:37 AM	✓							
13	SP4 @ 1'		1							8/22/17	11:55 AM	✓							
14	SP4 @ 2'		1							8/22/17	12:08 PM	✓							
15	SP4 @ 7'		1							8/22/17	12:15 PM	✓							
14	SP4 @ 12'		1							8/22/17	12:27 PM	✓							
17	NORTH @ SURFACE		1							8/22/17	1:05 PM	✓							
18	WEST @ SURFACE		1							8/22/17	1:20 PM	✓							
19	EAST @ SURFACE		1							8/22/17	1:35 PM	✓							
20	SOUTH @ SURFACE		1							8/22/17	1:50 PM	✓							

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Relinquished By: <i>[Signature]</i>	Date: 8/21/17	Time: 5:30 PM	Received By: <i>[Signature]</i>	Date: 8/22/17	Time: 9:05 C / 8:52	Sample Condition: Cool Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	CHECKED BY: (Initials) HC
Delivered By: (Circle One) <i>[Signature]</i>	UPS <input type="checkbox"/> Bus <input type="checkbox"/> Other: <input type="checkbox"/>	9:05 C / 8:52	Sample Condition: Cool Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	HC			

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476  
Corrected 7:25 C





**ARDINAL LABORATORIES**

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

**CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

**BILL TO**

**ANALYSIS REQUEST**

Company Name: BBC International, Inc. P.O. #:  
 Project Manager: Cliff Brunson  
 Address: P.O. Box 805 State: NM Zip: 88241  
 City: Hobbs Attn: *Wade Strick*  
 Phone #: 575-397-6388 Fax #: 575-397-0397  
 Project #: Project Owner: Oxy  
 Project Name: Sterling Silver 3 Federal #6 CTB (6/15/17 leak)  
 Project Location: Eddy County, NM  
 Sampler Name: Roger Hernandez  
 Fax #:

Lab I.D.	Sample I.D.	(G/RAB OR (C)OMP.	# CONTAINERS	MATRIX						DATE	TIME
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :		
31	SP7 @ 7'		1						8/23/17	2:31 PM	✓
32	SP7 @ 12'		1						8/23/17	2:42 PM	✓
33	SP7 @ 15'		1						8/23/17	3:08 PM	✓
34	SP8 @ 1'		1						8/24/17	9:08 AM	✓
35	SP8 @ 8'		1						8/24/17	9:31 AM	✓
36	SP8 @ 12'		1						8/24/17	9:59 AM	✓
37	SP8 @ 15'		1						8/24/17	10:25 AM	✓
38	SP9 @ 1'		1						8/24/17	10:55 AM	✓
39	SP9 @ 7'		1						8/24/17	11:26 AM	✓
40	SP9 @ 10'		1						8/24/17	11:52 AM	✓

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Relinquished By: *[Signature]* Date: 8/24/17  
 Received By: *[Signature]* Date: 8/25/17  
 Relinquished By: *[Signature]* Date: 8/25/17  
 Received By: *[Signature]* Date: 8/25/17  
 Delivered By: (Circle One) *9.05°C / 48.8°C* Sample Condition:  Intact  Cool  Yes  No  
 Checked By: *HC* (Initials)  
 Sampler - UPS - Bus - Other:

Phone Result:  Yes  No Add'l Phone #:  
 Fax Result:  Yes  No Add'l Fax #:  
 REMARKS:



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

**CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

5 of 5

Company Name: BBC International, Inc. **BILL TO** ANALYSIS REQUEST

Project Manager: Cliff Brunson P.O. #: Company:

Address: P.O. Box 805 City: Hobbs State: NM Zip: 88241

Phone #: 575-397-6388 Fax #: 575-397-0397 Attn: Address:

Project #: Project Owner: Oxy City: State: Zip: Project Name: Sterling Silver 3 Federal #6 CTB (6/15/17 leak)

Project Location: Eddy County, NM Phone #: Project Name: Roger Hernandez Fax #:

FOR LAB USE ONLY

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						DATE	TIME	REMARKS
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :			
41	SP9 @ 11'		1						8/24/17	12:02 PM	✓	
42	SP9 @ 12'		1						8/24/17	12:15 PM	✓	
43	SP9 @ 15'		1						8/24/17	12:40 PM	✓	
44	SP10 @ 1'		1						8/24/17	1:10 PM	✓	
45	SP10 @ 6'		1						8/24/17	1:27 PM	✓	
46	SP10 @ 8'		1						8/24/17	1:41 PM	✓	
47	SP10 @ 12'		1						8/24/17	2:15 PM	✓	
48	SP10 @ 15'		1						8/24/17	2:43 PM	✓	

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 analysis. 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.

Reinquinshed By: *W. Hernandez* Date: 8/24/17 Time: 5:30pm Received By: *Joslin Lemoyne*

Reinquinshed By: *Joslin Lemoyne* Date: 8/17/17 Time: 4:30pm Received By: *Hobbs*

Delivered By: (Circle One) *905-9* Sample Condition: Cool  Intact  Yes  No  Checked By: *HC*

Sampler - UPS - Bus - Other: *888-9*

REMARKS:  Yes  No Add'l Phone #: Add'l Fax #:

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

*corrected f. 25.6*

**From:** Bratcher, Mike, EMNRD  
**To:** [Cliff Brunson](#); [Shelly Tucker](#)  
**Cc:** [Weaver, Crystal, EMNRD](#); [Wade Dittrich](#); [Jennifer\\_Smith@oxy.com](mailto:Jennifer_Smith@oxy.com); [Ken Swinney](#); [Jennifer Gilkey](#); [Kathy Purvis](#)  
**Subject:** RE: OXY Sterling Silver 3 Federal #6 CTB (2RP-4261) - Delineation Workplan  
**Date:** Monday, March 5, 2018 10:11:17 AM

---

RE: OXY USA \* Sterling Silver 3 Fed 6 CTB \* **2RP-4261** \* DOR: 6/15/17

Cliff,

Your proposal for remediation of the above referenced release is approved. Federal sites will require like approval from BLM.

Mike Bratcher  
NMOCD District 2  
811 South First Street  
Artesia, NM 88210  
575-748-1283 Ext 108

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.

---

**From:** Cliff Brunson [mailto:[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)]  
**Sent:** Saturday, November 25, 2017 3:15 PM  
**To:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Shelly Tucker <[stucker@blm.gov](mailto:stucker@blm.gov)>  
**Cc:** Weaver, Crystal, EMNRD <[Crystal.Weaver@state.nm.us](mailto:Crystal.Weaver@state.nm.us)>; Wade Dittrich <[Wade\\_Dittrich@oxy.com](mailto:Wade_Dittrich@oxy.com)>; [Jennifer\\_Smith@oxy.com](mailto:Jennifer_Smith@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:** OXY Sterling Silver 3 Federal #6 CTB (2RP-4261) - Delineation Workplan

Mike and Shelly,

Please find the attached Delineation Workplan and remediation proposal for the OXY Sterling Sliver 3 Federal #6 CTB (2RP-4261). OXY is requesting that you review this plan and is looking forward to both the OCD's and 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  
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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**From:** Tucker, Shelly  
**To:** [Cliff Brunson](#)  
**Cc:** [Mike Bratcher](#); [Crystal Weaver](#); [Wade Dittrich](#); [Jennifer\\_Smith@oxy.com](#); [Ken Swinney](#); [Jennifer Gilkey](#); [Kathy Purvis](#)  
**Subject:** Re: OXY Sterling Silver 3 Federal #6 CTB (2RP-4261) - Delineation Workplan  
**Date:** Wednesday, December 27, 2017 12:40:36 PM

---

RE: OXY Sterling Silver 3 Federal #6 CTB (2RP-4261)

BLM accepts your delineation proposal as written.

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

Sincerely,

*Shelly J Tucker*

Environmental Protection Specialist  
O&G Spill/Release Coordinator

Bureau of Land Management  
620 E. Greene St  
Carlsbad, NM 88220

575.234.5905 - Direct  
575.361.0084 - Cellular  
575.234.6235 - Emergency Spill Number

[stucker@blm.gov](mailto:stucker@blm.gov)

The **BLM acceptance/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 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 Sat, Nov 25, 2017 at 3:15 PM, Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)> wrote:

Mike and Shelly,

Please find the attached Delineation Workplan and remediation proposal for the OXY Sterling Sliver 3 Federal #6 CTB (2RP-4261). OXY is requesting that you review this plan

and is looking forward to both the OCD's and 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

Mailing Address:

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