

# Closure Report

## Site Description

Site Name:	Calmon 2 CTB
Company:	Oxy USA Inc.
Legal Description:	U/L F, Section 35, T23S, R31E
County:	Eddy County, NM
GPS Coordinates:	N 32.26237 W-103.75082

## Release Data

Date of Release:	12/26/18
Type of Release:	Oil
Source of Release:	Oil hauler left their vent line open
Volume of Release:	7 bbls
Volume Recovered:	0 bbls

## Remediation Specifications

Remediation Parameters:	Excavated the entire leak area to a depth of 1 foot. Obtained confirmation bottom samples. Backfilled the site with clean soil.	
Remediation Activities:	10/18/19 to 10/31/19	
Plan Sent to OCD:	2/21/19	Email from Cliff Brunson to NMOCD
OCD Approval of Plan:	3/5/19	Email from Robert Hamlet to Cliff Brunson
Plan Sent to BLM:	2/21/19	Email from Cliff Brunson to the BLM
BLM Approval of Plan:	6/17/19	Email from Jim Amos to Cliff Brunson

## Supporting Documentation

Initial C-141	Signed 1/25/19
C-141, page 6	Signed and included
Site Diagram	January 2019
Pictures	Remediation photos prior to backfill

## Request for Closure

Based on the completion of the remediation plan, BBC International, Inc. requests closure approval from NMOCD.

Cliff Brunson, President, BBC International, Inc.

11/11/19

# Oxy, Calmon 2 CTB

Leak date: 12/26/18  
Eddy County, NM  
2RP-5215

## Legend

-  1 foot Excavation across entire leak area
-  Confirmation sample points
-  Leak Area



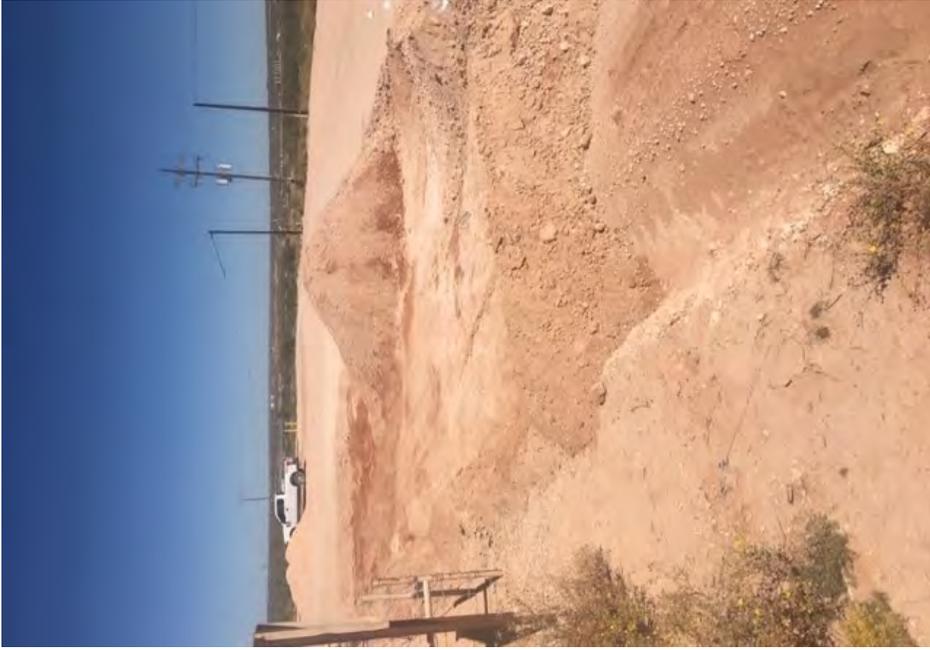
Oxy, Calmon 2 CTB

Confirmation sample points

B1, N 32.26244 W-103.75082

B2, N 32.26237 W-103.75081

B3, N 32.26229 W-103.75081



Laboratory Analytical Results Summary  
CalMon 2 CTB (12/26/19)

Analyte	Method	Sample ID	BOTTOM 1
		Date	10/25/19
			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		528
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		124
EXT DRO	TPH 8015M		80.4

Analyte	Method	Sample ID	BOTTOM 2
		Date	10/25/19
			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		528
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		101
EXT DRO	TPH 8015M		60.9

Analyte	Method	Sample ID	BOTTOM 3
		Date	10/25/19
			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		608
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		213
EXT DRO	TPH 8015M		134



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

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October 28, 2019

Cliff Brunson  
BBC International, Inc.  
P.O. Box 805  
Hobbs, NM 88241

RE: CALMON 2 CTB

Enclosed are the results of analyses for samples received by the laboratory on 10/25/19 11:58.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-18-11. 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/ga/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/ga/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



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

**Analytical Results For:**

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

Received:	10/25/2019	Sampling Date:	10/25/2019
Reported:	10/28/2019	Sampling Type:	Soil
Project Name:	CALMON 2 CTB	Sampling Condition:	** (See Notes)
Project Number:	( 12/26/18 )	Sample Received By:	Tamara Oldaker
Project Location:	OXY- EDDY COUNTY, NM		

**Sample ID: BOTTOM 1 (H903661-01)**

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	10/26/2019	ND	1.79	89.4	2.00	2.62		
Toluene*	<0.050	0.050	10/26/2019	ND	1.76	88.1	2.00	1.65		
Ethylbenzene*	<0.050	0.050	10/26/2019	ND	1.79	89.3	2.00	2.86		
Total Xylenes*	<0.150	0.150	10/26/2019	ND	5.35	89.2	6.00	2.76		
Total BTEX	<0.300	0.300	10/26/2019	ND						

Surrogate: 4-Bromofluorobenzene (PID) 108 % 73.3-129

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>528</b>	16.0	10/25/2019	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	10/25/2019	ND	220	110	200	5.72		
<b>DRO &gt;C10-C28*</b>	<b>124</b>	10.0	10/25/2019	ND	220	110	200	6.63		
<b>EXT DRO &gt;C28-C36</b>	<b>80.4</b>	10.0	10/25/2019	ND						

Surrogate: 1-Chlorooctane 98.3 % 41-142

Surrogate: 1-Chlorooctadecane 127 % 37.6-147

Cardinal Laboratories

\* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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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:	10/25/2019	Sampling Date:	10/25/2019
Reported:	10/28/2019	Sampling Type:	Soil
Project Name:	CALMON 2 CTB	Sampling Condition:	** (See Notes)
Project Number:	( 12/26/18 )	Sample Received By:	Tamara Oldaker
Project Location:	OXY- EDDY COUNTY, NM		

**Sample ID: BOTTOM 2 (H903661-02)**

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	10/26/2019	ND	1.79	89.4	2.00	2.62		
Toluene*	<0.050	0.050	10/26/2019	ND	1.76	88.1	2.00	1.65		
Ethylbenzene*	<0.050	0.050	10/26/2019	ND	1.79	89.3	2.00	2.86		
Total Xylenes*	<0.150	0.150	10/26/2019	ND	5.35	89.2	6.00	2.76		
Total BTEX	<0.300	0.300	10/26/2019	ND						

Surrogate: 4-Bromofluorobenzene (PID) 99.6 % 73.3-129

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>528</b>	16.0	10/25/2019	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	10/25/2019	ND	220	110	200	5.72		
<b>DRO &gt;C10-C28*</b>	<b>101</b>	10.0	10/25/2019	ND	220	110	200	6.63		
<b>EXT DRO &gt;C28-C36</b>	<b>60.9</b>	10.0	10/25/2019	ND						

Surrogate: 1-Chlorooctane 96.2 % 41-142

Surrogate: 1-Chlorooctadecane 116 % 37.6-147

Cardinal Laboratories

\* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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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:	10/25/2019	Sampling Date:	10/25/2019
Reported:	10/28/2019	Sampling Type:	Soil
Project Name:	CALMON 2 CTB	Sampling Condition:	** (See Notes)
Project Number:	( 12/26/18 )	Sample Received By:	Tamara Oldaker
Project Location:	OXY- EDDY COUNTY, NM		

**Sample ID: BOTTOM 3 (H903661-03)**

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	10/26/2019	ND	1.79	89.4	2.00	2.62		
Toluene*	<0.050	0.050	10/26/2019	ND	1.76	88.1	2.00	1.65		
Ethylbenzene*	<0.050	0.050	10/26/2019	ND	1.79	89.3	2.00	2.86		
Total Xylenes*	<0.150	0.150	10/26/2019	ND	5.35	89.2	6.00	2.76		
Total BTEX	<0.300	0.300	10/26/2019	ND						

Surrogate: 4-Bromofluorobenzene (PID) 97.4 % 73.3-129

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>608</b>	16.0	10/25/2019	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	10/25/2019	ND	220	110	200	5.72		
<b>DRO &gt;C10-C28*</b>	<b>213</b>	10.0	10/25/2019	ND	220	110	200	6.63		
<b>EXT DRO &gt;C28-C36</b>	<b>134</b>	10.0	10/25/2019	ND						

Surrogate: 1-Chlorooctane 101 % 41-142

Surrogate: 1-Chlorooctadecane 115 % 37.6-147

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\* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

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Caley D. Keene, Lab Director/Quality Manager

9 Jo 9 e6e d



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

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

10x1

Company Name: BBC International, Inc.		<b>BILL TO</b>		P.O. #:		ANALYSIS REQUEST	
Project Manager: Cliff Brunson		Company: Oxy		Attn: W. D. HICK			
Address: P.O. Box 805		State: NIM		Zip: 88241			
City: Hobbs		Phone #: 575-397-6388		Fax #: 575-397-0397			
Project #: _____		Project Owner: Oxy		City: _____			
Project Name: Calmon 2 CTB (12/26/18)		State: _____		Zip: _____			
Project Location: Eddy County, NM		Phone #: _____		Fax #: _____			
Sampler Name: Roger Hernandez		FOR LAB USE ONLY					

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						DATE	TIME	BTEX	CI	TPH EXT
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :					
H903661	1 BOTTOM 1		6			✓			10/25/19	8:00 AM	✓	✓	✓	
	2 BOTTOM 2		6			✓			10/25/19	8:30 AM	✓	✓	✓	
	3 BOTTOM 3		6			✓			10/25/19	9:00 AM	✓	✓	✓	
KLD 10/25/19														

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Relinquished By: <i>[Signature]</i>	Date: 10/25/19	Received By: <i>[Signature]</i>	Date: 10/25/19
Relinquished By: <i>[Signature]</i>	Time: 11:00am	Received By: <i>[Signature]</i>	Time: 11:55
Delivered By: (Circle One) UPS <input checked="" type="checkbox"/> Bus <input type="checkbox"/> Other <input type="checkbox"/>	4:42	Sample Condition Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/>	CHECKED BY: <i>[Signature]</i>
Sampler - UPS - Bus - Other: <i>[Signature]</i>	#97	Sample Condition Cool <input type="checkbox"/> Intact <input type="checkbox"/>	575

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

Brought to lab from field. Not enough time to wash temp

RUSH!!!

Form C-141  
Page 6

State of New Mexico  
Oil Conservation Division

Incident ID	
District RP	2RP-5215
Facility ID	
Application ID	

### Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Wade Dittrich Title: Environmental Coordinator  
 Signature:  Date: 11-6-19  
 email: wade\_dittrich@oxy.com Telephone: (575) 390-2828

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_