OXY USA, Inc. Cotton Draw Unit #10 Delineation Report and Work Plan

Section 16, T25S, R32E Lea County, New Mexico

April 23, 2014



Prepared for:

OXY USA, Inc. 1017 W Stanolind Road Hobbs, New Mexico 88240

By:

Safety & Environmental Solutions, Inc. 703 East Clinton Street Hobbs, New Mexico 88240 (575) 397-0510

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I. Company Contacts

Representative	Company	Telephone	E-mail
Austin Tramell	OXY USA, INC.	575-499-4919	Austin_Tramell@oxy.com
Bob Allen	SESI	575-397-0510	ballen@sesi-nm.com

II. Background

Safety and Environmental Solutions, Inc. (SESI) was engaged by OXY USA, INC to perform site assessment of a release area at the Cotton Draw Unit #10 located in Section 16 of Township 25 South, Range 32 East, Lea County, New Mexico.

According to the C-141 dated April 01, 2014 the cause of release was internal corrosion of a 2" steel production flow line.

III. Surface and Ground Water

The nearest groundwater of record is approximately 7.8 miles north of the site. The New Mexico Office of State Engineer record is in Section 05 Range 32 East and Township 24 South. The reported depth was 380 feet below ground surface (BGS).

IV. Characterization

The target cleanup levels are determined using the *Guidelines for Remediation of Leaks, Spills and Releases* published by the NMOCD (August 13, 1993). Based on the ranking criteria presented below, the applicable Recommended Remediation Action Levels (RRAL) are 10 parts per million (ppm) Benzene, 50 ppm combined benzene, toluene, ethylbenzene, and total xylenes (BTEX), and 5,000 ppm Total Petroleum Hydrocarbons (TPH).

Depth to Ground Water:							
(Vertical distance from contaminants to	Less than 50 feet	20 points					
seasonal high water elevation of	50 feet to 99 feet	10 points					
groundwater)	>100 feet	0 points	Χ				
Wellhead Protection Area:							
(Less than 200 feet from a private domestic	Yes	20 points					
water source; or less than 1000 feet from all	No	0 points	X				
other water sources)		-					
Distance to Surface Water:							
(Horizontal distance to perennial lakes,	Less than 200 feet	20 points					
ponds, rivers, streams, creeks, irrigation	200 feet to 1000 feet	10 points					
canals and ditches)	>1000 feet	0 points	X				
RANKING SCORE (TOTAL POINTS)							

V. Work Performed

On April 3, 2014 SESI was onsite to perform a site assessment. The release area was mapped utilizing a Trimble Juno 3D and site photos were taken.

On April 21, 2014, SESI was onsite to determine vertical extent of contamination using a hand auger to collect samples. SP-1 was taken at the surface and at a depth of 1'

where a hard caliche layer was encountered. Samples were taken at SP-2 at surface and at 1' ft., 2' ft. and 2.5 ft. A hard layer of caliche was encountered the depth of 2.5 ft. Samples were taken at SP-3 at the surface and at 1' ft., 2 ft. and, 2.5 ft. where a hard layer of caliche was encountered. All samples were properly packaged, preserved and transported to Cardinal Laboratories, Hobbs New Mexico and analyzed for Chloride (CI⁻) (Method SM4500CI-B). The results of the analysis are presented in the table below:

Lab ID	Sample ID	CI (mg/kg)
Analysis Date:	-	
5-1-2014	Sample Pt 1 @ Surface	20800
5-1-2014	Sample Pt 1 @ 1' BGS	3640
5-1-2014	Sample Pt 2 @ Surface	36800
5-1-2014	Sample Pt 2 @ 1' BGS	1070
5-1-2014	Sample Pt 2 @ 2' BGS	2320
5-1-2014	Sample Pt 2 @ 2'6" BGS	8480
5-1-2014	Sample Pt 3 @ Surface	14700
5-1-2014	Sample Pt 3 @ 1' BGS	3800
5-1-2014	Sample Pt 3 @ 2' BGS	11600
5-1-2014	Sample Pt 3 @ 2'6" BS	12000

On April 22, 2014, SESI, along with Custom Welding were on site to install (4) four test trenches to determine further contamination. Test Trenches samples were taken at 1 ft., 4ft., 5ft and 6 ft. away from the pipelines. A hard layer of caliche was encountered at the 6 ft. All samples were properly packaged, preserved and transported to Cardinal Laboratories, Hobbs New Mexico and analyzed for Chloride (CI⁻) (Method SM4500CI-B). The results of the analysis are presented in the table below:

Lab ID	Sample ID	CI (mg/kg)
Analysis Date:	-	
5-1-2014	TT-1 @ 3'	2960
5-1-2014	TT-1 @ 4'	528
5-1-2014	TT-1 @ 5'	2200
5-1-2014	TT-1 @ 6'	1500

VI. Action Plan

Due to the extreme depth to groundwater and the hard caliche layer encountered at 2.5 ft. BGS, the following action plan is proposed:

- 1. All contaminated soil with a chloride concentration over 1,500 PPM will be removed and transported to an approved NMOCD facility for disposal.
- 2. The excavated area will be backfilled with native soil and returned to natural grade.
- 3. No further action is necessary.

VII. Figures & Appendices

Figure 1 – Vicinity Map Figure 2 – Site Plan Figure 3 – NMOCD Trend Map Appendix A – Analytical Results Appendix B – C-141 Figure 1 Vicinity Map



Figure 2 Site Plan



OXY-14-008 Cotton Draw Unit #10

Figure 3 NMOCD Trend Map



NMOCD Trend Map

Appendix A Analytical Results



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

May 01, 2014

Bob Allen Safety & Environmental Solutions 703 East Clinton Hobbs, NM 88240

RE: COTTONDRAW UNIT 10

Enclosed are the results of analyses for samples received by the laboratory on 05/01/14 8:15.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. 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.

Cardinal Laboratories is accreditated 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,

Celeg D. Keine

Celey D. Keene Lab Director/Quality Manager

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

Analytical Results For:

Safety & Environmental Solutions Bob Allen 703 East Clinton Hobbs NM, 88240 Fax To: (575) 393-4388

Received:	05/01/2014	Sampling Date:	04/21/2014
Reported:	05/01/2014	Sampling Type:	Soil
Project Name:	COTTONDRAW UNIT 10	Sampling Condition:	** (See Notes)
Project Number:	OXY-14-008	Sample Received By:	Celey D. Keene
Project Location:	C1		

Sample ID: SAMPLE PT 1 @ SURFACE (H401318-01)

Chloride, SM4500CI-B	mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Slank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	20800	16.0	05/01/2014	ND	416	104	400	3.92	

Sample ID: SAMPLE PT 1 @ 1' BGS (H401318-02)

Chloride, SM4500Cl-B	mg	/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	85	% Recovery	True Value QC	RPD	Qualifier
Chloride	3640	16.0	05/01/2014	ND	416	104	400	3.92	

Sample ID: SAMPLE PT 2 @ SURFACE (H401318-03)

Chloride, SM4500CI-8	mg/kg		Analyzed By: AP						22
Analyte	Result	Reporting Limit	Analyzed	Method Slank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	36800	16.0	05/01/2014	ND	416	104	400	3.92	

Sample ID: SAMPLE PT 2 @ 1' BGS (H401318-04)

Chloride, SM4500CI-B	mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	es	% Recovery	True Value QC	RPD	Qualifier
Chloride	1070	16.0	05/01/2014	ND	416	104	400	3,92	

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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

Analytical Results For:

Safety & Environmental Solutions Bob Allen 703 East Clinton Hobbs NM, 88240 Fax To: (575) 393-4388

Received:	05/01/2014	Sampling Date:	04/21/2014
Reported:	05/01/2014	Sampling Type:	Soil
Project Name:	COTTONDRAW UNIT 10	Sampling Condition:	** (See Notes)
Project Number:	OXY-14-008	Sample Received By:	Celey D. Keene
Project Location:	C1		

Sample ID: SAMPLE PT 2 @ 2' BGS (H401318-05) ----

Chioride, SM4500CI-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	85	% Recovery	True Value QC	RPD	Qualifier
Chloride	2320	16.0	05/01/2014	ND	416	104	-400	3.92	

Sample ID: SAMPLE PT 2 @ 2'6" BGS (H401318-06)

Chloride, SM4500CI-B	mg.	/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	8480	16.0	05/01/2014	ND	416	104	400	3.92	

Sample ID: SAMPLE PT 3 @ SURFACE (H401318-07)

Chloride, SM4500CI-B	mg	mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	85	% Recovery	True Value QC	RPD	Qualifier
Chloride	14700	16.0	05/01/2014	ND	416	104	400	3.92	

Sample ID: SAMPLE PT 3 @ 1' BGS (H401318-08)

Chioride, SM4500CI-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS-	% Recovery	True Value QC	RPD	Qualifier
Chloride	3800	16.0	05/01/2014	ND	416	104	400	3.92	

Sample ID: SAMPLE PT 3 @ 2' BGS (H401318-09)

Chloride, SM4500CI-B	mg.	/kg	Analyzed By: AP						23
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	11600	16.0	05/01/2014	ND	416	104	400	3.92	

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBB5, NM 88240

Analytical Results For:

Safety & Environmental Solutions Bob Allen 703 East Clinton Hobbs NM, 88240 Fax To: (575) 393-4388

Received:	05/01/2014	Sampling Date:	04/21/2014
Reported:	05/01/2014	Sampling Type:	Soil
Project Name:	COTTONDRAW UNIT 10	Sampling Condition:	++ (See Notes)
Project Number:	OXY-14-008	Sample Received By:	Celey D. Keene
Project Location:	C1		

Sample ID: SAMPLE PT 3 @ 2'6" BGS (H401318-10)

Chloride, SM4500CI-B mg/kg Analyzed By: AP

Analyte	Result	Reporting Limit	Analyzed	Hethod Blank	85	% Recovery	True Value QC	RPD	Qualifier
Chloride	12000	16.0	05/01/2014	ND	416	104	400	3.92	

Sample ID: TT-1 @ 3' BGS (H401318-11)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Hethod Blenk	85	% Recovery	True Value QC	RPD	Qualifier
Chloride	2960	16.0	05/01/2014	ND	416	104	400	3.92	

Sample ID: TT-1 @ 4' BG5 (H401318-12)

Chloride, SM4500CI-B	nig	/kg	Analyze	id By: AP				
Analyte	Result	Reporting Limit	Analyzed	Hethod Blank	85	% Recovery	True Value QC	RPD
Chloride	528	16.0	05/01/2014	ND	416	104	400	3.92

Sample ID: TT-1 @ 5' BGS (H401318-13)

Chloride, SM4500CI-8 mg/kg		/kg	ig Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Hethod Blank	85	% Recovery	True Value QC	RPD	Qualifier
Chloride	2200	15.0	05/01/2014	ND	416	104	400	3.92	

Sample ID: TT-1 @ 6' BGS (H401318-14)

Chloride, SM4500CI-B	mg/kg		Analyzed By: AP						111
Analyte	Result	Reporting Limit	Analyzed	Method Blank	85	% Recovery	True Value QC	RPD	Qualifier
Chloride	1500	16.0	05/01/2014	ND	416	104	400	3.92	

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Qualifier

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Celey D. Keene, Lab Director/Quality Manager

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PHONE (575) 393-2326 * 101 E. MARLAND * HOBBS, NH 88240

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 SH4500CH6 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

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Appendix B C-141

District III 1000 Rio Brazos Road, Aztec, NM 87410 District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505 Release Name of Company Oxy USA Inc. Address 1017 W Stanolind Road Facility Name Cotton Draw Unit 10	1220 Sou		cis Dr. 505	Submit I Cop a	y to appropri	
1220 S. St. Francis Dr., Santa Fe, NM 87505 Release Name of Company Oxy USA Inc. Address 1017 W Stanolind Road	Santa I	Fe, NM 875	505		ecordance wi	ate District Office i ith 19.15.29 NMAC
Name of Company Oxy USA Inc. Address 1017 W Stanolind Road		on and Co				
Name of Company Oxy USA Inc. Address 1017 W Stanolind Road	Notificatio					
Address 1017 W Stanolind Road				ction		
Address 1017 W Stanolind Road		OPERA'		🛛 Initi	al Report	Final Rep
Facility Name Cotton Draw Unit 10			Austin Tramell No. 575-499-49	10		
		and the second se	e Well location			
Surface Owner BLM	dineral Owner				0. 30-025-0	8195
	LOCATIO	N OF RE	LEASE			
Unit Letter Section Township Range Feet f		h/South Line	Feet from the	East/West Line	County	
A 16 25S 32E 660	N		110			
	N	1	660	E	Lea	
Latitude_3	2.13683°	_ Longitude	e103.67362°_			
	NATURE	OF REL	EASE			
Type of Release Produced Water Source of Release 2" steel production line due to intern	al comocion		Release 35BBL four of Occurrence		Recovered 3	
control of restoration of the sector production mile and to milet	iai conresion	CONTROL IN SALE	4 @ 2:00 PM	e Date and	Hour of Dis	covery
Was Immediate Notice Given?	Not Required	If YES, To Geoffrey L		lennifer Van Cure	BIM	
By Whom? Austin Tramell			lour 04/02/2014		i DEM	
Was a Watercourse Reached?		and the second se	alume Impacting I			
🗌 Yes 🖾 No						
Describe Cause of Problem and Remedial Action Taken Internal corrosion on a 2" steel production flow line caus shut in.		duced water to	leak onto the gro	und. 30 bbls of flu	id was recov	ered and well was
Describe Area Affected and Cleanup Action Taken.* The affected area is approximately 18'x40'. Remediation BLM.	n will be comple	ted in accorda	nce with an appro	ved remediation pl	an from the	NMOCD and the
I hereby certify that the information given above is true a regulations all operators are required to report and/or file public health or the environment. The acceptance of a C should their operations have failed to adequately investig or the environment. In addition, NMOCD acceptance of federal, state, or locglaws and/or regulations.	e certain release -141 report by the eate and remedia	notifications as ne NMOCD m te contaminati	nd perform correct arked as "Final Ri on that pose a thr	tive actions for rel port" does not rel at to ground wate	eases which ieve the oper	may endanger ator of liability
			OIL CONS	SERVATION	DIVISIC	N
Signature: Stant				- + - +		
		Approved by	Environmental Sp	ecialist:		
Printed Name: Austin Tramell		Approved by Approval Dat		Expiration	Date:	
Printed Name: Austin Tramell Title: HES Specialist			e:			
Signature: Austin Tramell Title: HES Specialist E-mail Address: Austin_tramell@oxy.com Date: 04/14/2014 Phone: 575-499-4919		Approval Dat	e:		Dale:	

Appendix C Site Photographs



Photo #1 – East of fence line facing west



Photo #2 – West of fence line facing west



Photo #3 – Release Point



Photo #4 – Spill area facing east



Photo #5 - Spill are facing north east end



Photo #6 – Spill area facing north West end



Photo # 7 – Spill area facing south west end



Photo #8 – Spill are facing south east end



Photo #9 – Bottom of spill area

Appendix D NMOSE Water Column/Average Depth to Water

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 ar	re 1=NW 2=NE 3=S1 re smallest to larges		3 UTM in meters)		(In feet)
POD Number C 02216		Contraction of the second s	Q 4 Sec Tws Rng 4 21 23S 32E	X 625035	Y 3573261* 🌚 Average Depth to Minimum	Well 585 Water:	Depth Water Water Column 400 185 400 feet 400 feet
Record Count: 1		100 000 000 000 000 000		na (a) (a) (a) (a)	Maximum	Depth:	400 feet
PLSS Search:							

W			o Office o n/Aver				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=S smallest to largest	02 3456-555	3 UTM in meters)		(in feet)
POD Number	POD Sub-	999		v	v		Depth Water
C 03555 POD1		and the second sec	4 Sec Tws Rng 05 24S 32E	X 622709	3569231	600	380 220
					Auron Dark I	Water	200 6-1
					Average Depth to Minimum		380 feet 380 feet
					Maximum	- 192	380 feet
Record Count: 1							
PLSS Search:							
Section(s): 5	Tours	ship: 24S	Range: 32E				

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(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)	(qua					W 4=SE) t) (NAD8	3 UTM in meters}		(in feet)	
	POD Sub-		9 9	Q					Depth	Depth 1	Water
POD Number	Code basin (County ED				s Rng	X 617690	Y 3568631* 🌍	Well 275	Water C 160	olumn 115
<u>C 02405</u>		10102	4							100	115
<u>C 02460</u>	С	ED			02 24		617496	3568022*	320		
C 02460 POD2	С	ED		3 (2 24	5 31E	617496	3568022* 🌍	320		
C 02464	С	ED	34	1 (02 24	5 31E	617589	3568530* 🌍	320	205	115
								Average Depth to	Water:	182 fee	et
								Minimum	Depth:	160 fee	et
								Maximum	Depth:	205 fee	rt
	Tow					31E					