

# Closure Report

## Site Description

Site Name:	MLMU #254
Company:	Oxy Permian Ltd.
Legal Description:	U/L I, Section 30, T23S, R37E
County:	Lea County, NM
GPS Coordinates:	N 32.27443° W 103.19525°

## Release Data

Date of Release:	Unknown
Type of Release:	Oil and produced water
Source of Release:	Flow line
Volume of Release:	Unknown
Volume Recovered:	0 bbls

## Remediation Specifications

Remediation Parameters:	Excavate to a depth of 4 feet across the entire leak site. Place a liner in the excavated area. Backfill the site with clean soil.	
Remediation Activities:	10/09/2014 to 10/27/2014	
Plan Sent to OCD:	10/14/2014	Email from Cliff Brunson to Tomas Oberding
OCD Approval of Plan:	10/15/2014	Email from Tomas Oberding to Cliff Brunson
Plan Sent to BLM:	n/a	n/a
BLM Approval of Plan:	n/a	n/a

## Supporting Documentation

Initial C-141	Signed 07/31/2014
Final C-141	Signed 11/03/2014
Site Diagram	July 2014
Groundwater Plot	100'-125'
TOPO Maps	July 2014
Lab Summary	08/21/2014
Lab Analysis	08/21/2014
Correspondence	Request and approval of remediation plan via email

## Request for Closure

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

Cliff Brunson, President of BBC International Inc.

11/10/2014

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

Form C-141  
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

**Release Notification and Corrective Action**

**OPERATOR**

Initial Report  Final Report

Name of Company	Oxy Permian Ltd.	Contact	Chancey Summers
Address	1017 W. Stanolind Rd, Hobbs, NM 88240	Telephone No.	(575) 397-8216
Facility Name	MLMU #254	Facility Type	Well
Surface Owner	Mineral Owner	API No. 30-025-29657	

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
I	30	23S	37E					Lea County, NM

Latitude N 32.27443° Longitude W 103.19525°

**NATURE OF RELEASE**

Type of Release	Oil and produced water	Volume of Release	Unknown	Volume Recovered	0 bbls
Source of Release	Flow line	Date and Hour of Occurrence	Unknown	Date and Hour of Discovery	
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Tomas Oberding, NMOCD			
By Whom?	Kathy Purvis, BBC International	Date and Hour 07/29/2014 @ 11:33 am			
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.\*

An unknown event from a flow line caused oil and produced water to leak onto the ground. No fluids were recovered and the line was repaired or replaced.

Describe Area Affected and Cleanup Action Taken.\*

The affected area is approximately 40' x 46' in the pasture. Remediation will be completed in accordance with a remediation plan approved by NMOCD.

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:	<u>OIL CONSERVATION DIVISION</u>		
Printed Name: Chancey Summers	Approved by Environmental Specialist:		
Title: HES Advisor	Approval Date:	Expiration Date:	
E-mail Address: <a href="mailto:Chancey.Summers@oxy.com">Chancey.Summers@oxy.com</a>	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 7-31-14	Phone: (575) 397-8216		

\* Attach Additional Sheets If Necessary

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
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State of New Mexico  
Energy Minerals and Natural Resources

Form C-141  
Revised August 8, 2011

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

Submit 1 Copy to appropriate District Office in  
accordance with 19.15.29 NMAC.

**Release Notification and Corrective Action**

**OPERATOR**

Initial Report  Final Report

Name of Company	Oxy Permian Ltd.	Contact	Chancey Summers
Address	1017 W. Stanolind Rd, Hobbs, NM 88240	Telephone No.	(575) 397-8216
Facility Name	MLMU #254	Facility Type	Well
Surface Owner	Mineral Owner	API No. 30-025-29657	

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
I	30	23S	37E					Lea County, NM

Latitude N 32.27443° Longitude W 103.19525°

**NATURE OF RELEASE**

Type of Release	Oil and produced water	Volume of Release	Unknown	Volume Recovered	0 bbls
Source of Release	Flow line	Date and Hour of Occurrence	Unknown	Date and Hour of Discovery	
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Tomas Oberding, NMOCD		
By Whom?	Kathy Purvis, BBC International	Date and Hour	07/29/2014 @ 11:33 am		
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.\*

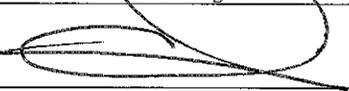
Describe Cause of Problem and Remedial Action Taken.\*

An unknown event from a flow line caused oil and produced water to leak onto the ground. No fluids were recovered and the line was repaired or replaced.

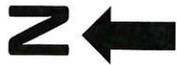
Describe Area Affected and Cleanup Action Taken.\*

The affected area is approximately 40' x 46' in the pasture. Remediation was completed in accordance with the remediation plan approved by Tomas Oberding of NMOCD via email on 10/15/2014.

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: Chancey Summers	Approved by Environmental Specialist:		
Title: HES Advisor	Approval Date:	Expiration Date:	
E-mail Address: <a href="mailto:Chancey.Summers@oxy.com">Chancey.Summers@oxy.com</a>	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 11-3-14 Phone: (575) 397-8216			

\* Attach Additional Sheets If Necessary



Oxy  
MLMU #254

Not a  
road



MLMU  
#29



U/L I, Section 30, T23S, R37E  
Lea County, NM  
N 32.27443° W 103.19525°

BBC International, Inc.

Oxy

MLMU #254

Date: 07/22/14 DRWG by: K. Purvis

NOT TO SCALE File: Oxy 2014

# Groundwater Plot

## Oxy MLMU #254

County  
Lea

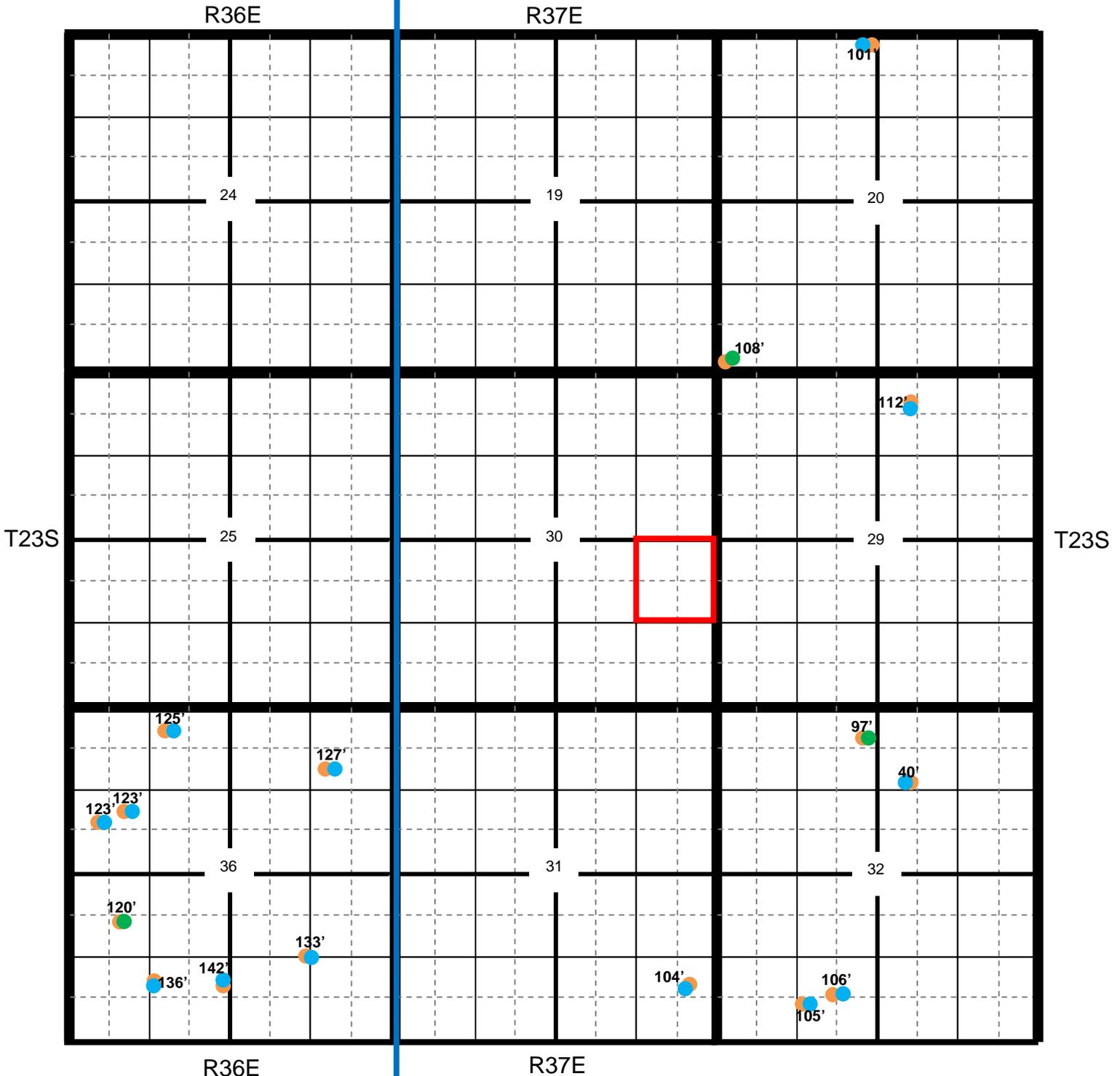
Unit Letter  
I

Section  
30

Township  
23S

Range  
37E

Trend Map 100'-125'



Location

OCD

USGS

SEO

All Databases

Section Quarters

Oxy MLMU #254

County: Lea      Unit Letter: I      Section: 30      Township: 23S      Range: 37E

Trend Map 100'-125'

1

2

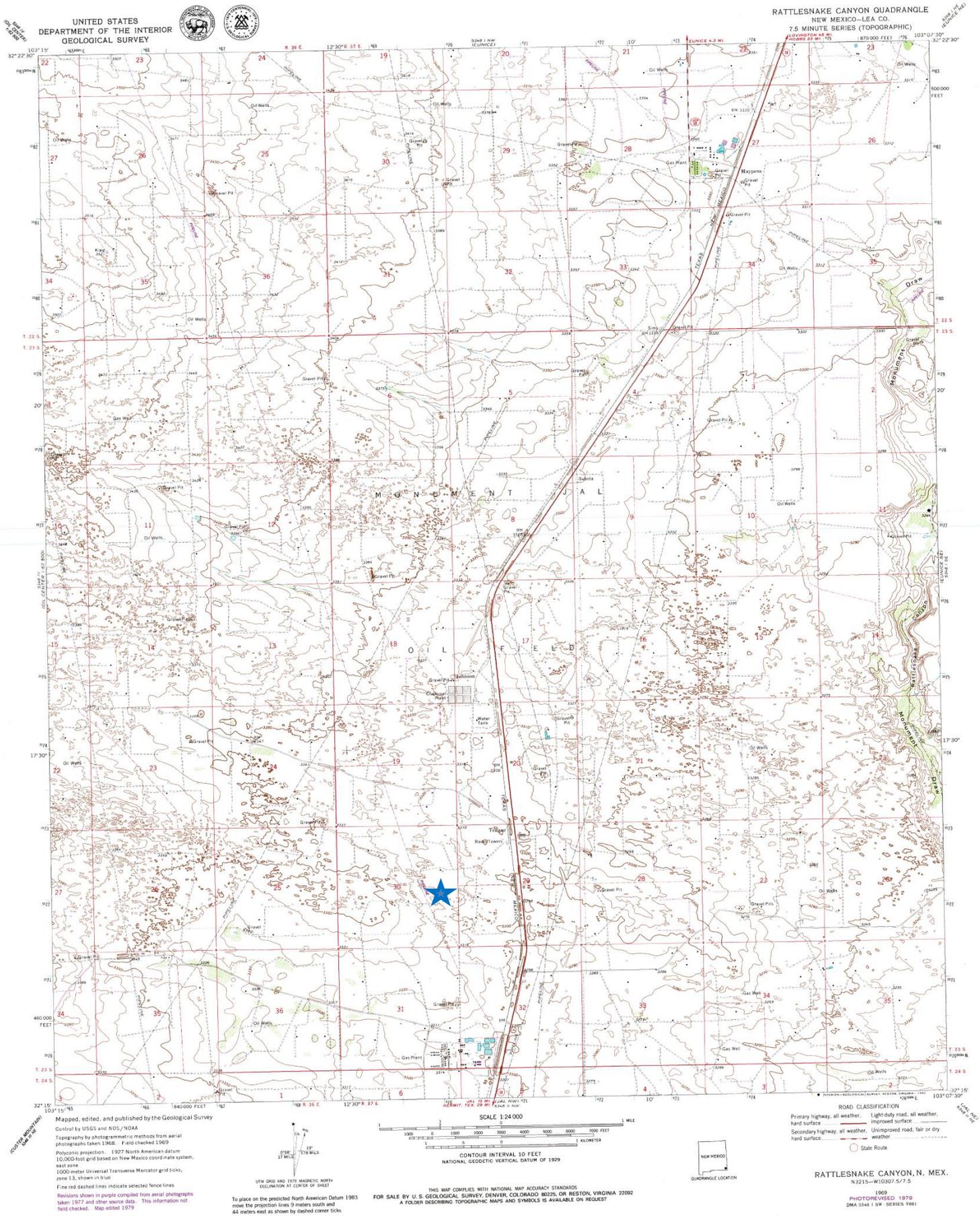
NW/NW <b>None found</b>	NE/NW	NW/NE	NE/NE
Unit Letter D	Unit Letter C	Unit Letter B	Unit Letter A
SW/NW	SE/NW	SW/NE	SE/NE
Unit Letter E	Unit Letter F	Unit Letter G	Unit Letter H
NW/SW	NE/SW	NW/SE	NE/SE
Unit Letter L	Unit Letter K	Unit Letter J	Unit Letter I
SW/SW	SE/SW	SW/SE	SE/SE
Unit Letter M	Unit Letter N	Unit Letter O	Unit Letter P

3

4

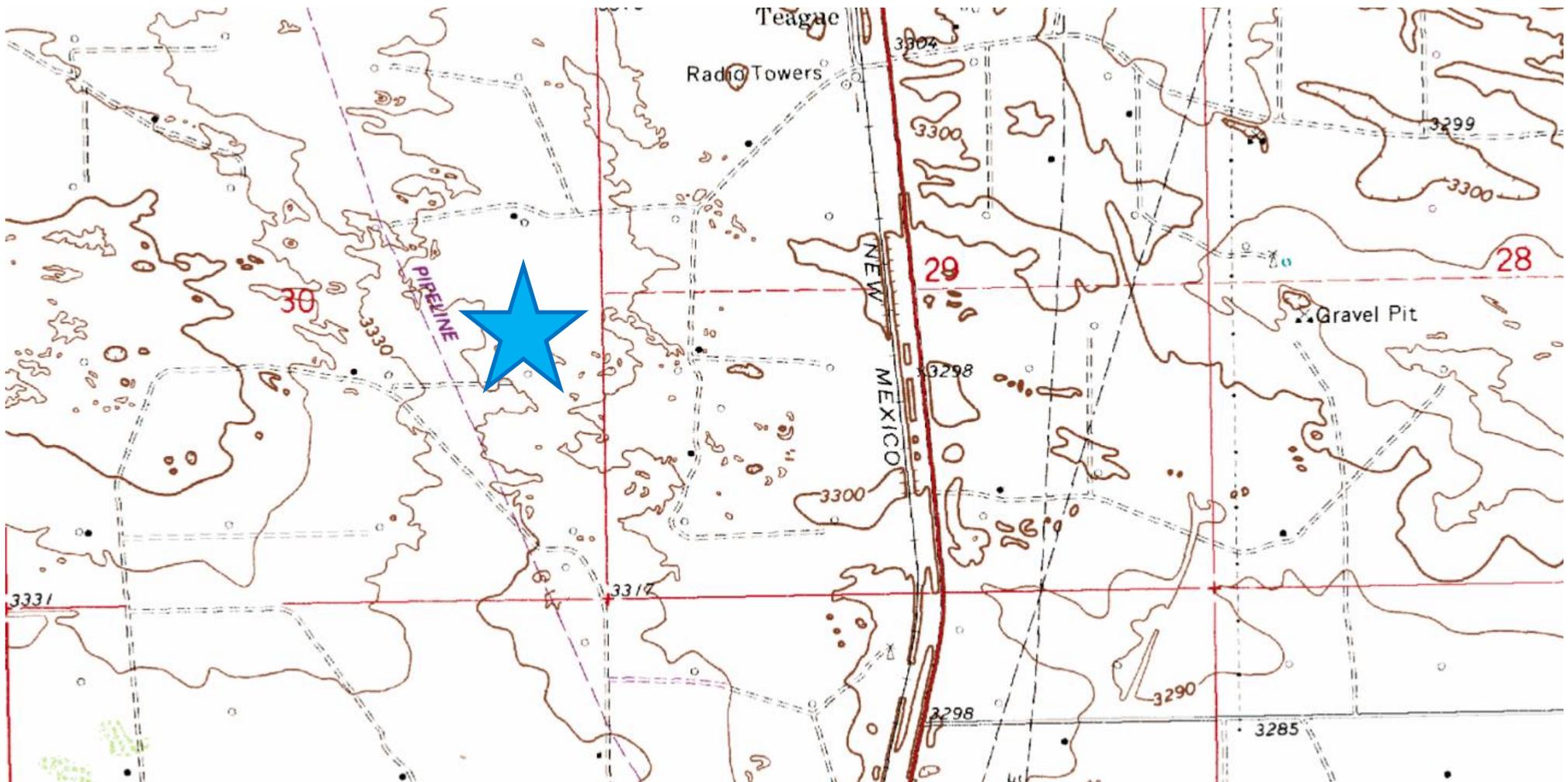
# Oxy

## MLMU #254



# Oxy

## MLMU #254



**Laboratory Analytical Results Summary**  
**MLMU #254**

		Sample	SP1 @ 1'	SP1 @ 3'	SP1 @ 6'	SP1 @ 9'	SP1 @ 12'	SP1 @ 15'	SP1 @ 18'	SP1 @ 19'
Analyte	Method	Date	8/21/14	8/21/14	8/21/14	8/21/14	8/21/14	8/21/14	8/21/14	8/21/14
			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
<b>Benzene</b>	BTEX 8021B		<0.500	<0.100	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050
<b>Toluene</b>	BTEX 8021B		<0.500	<b>0.103</b>	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050
<b>Ethylbenzene</b>	BTEX 8021B		<0.500	<b>0.227</b>	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050
<b>Total Xylenes</b>	BTEX 8021B		<b>1.73</b>	<b>0.687</b>	<0.150	<0.150	<0.150	<0.150	<0.150	<0.150
<b>Total BTEX</b>	BTEX 8021B		<3.00	<b>1.02</b>	<0.300	<0.300	<0.300	<0.300	<0.300	<0.300
<b>Chloride</b>	SM4500Cl-B		<16.0	<b>80</b>	<b>560</b>	<b>1170</b>	<b>928</b>	<b>1020</b>	<b>416</b>	<b>224</b>
<b>GRO</b>	TPH 8015M		<b>959</b>	<b>111</b>	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0
<b>DRO</b>	TPH 8015M		<b>17500</b>	<b>1560</b>	<b>211</b>	<b>13.9</b>	<10.0	<b>13.1</b>	<b>16.1</b>	<b>11.1</b>



August 28, 2014

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: MLMU #254

Enclosed are the results of analyses for samples received by the laboratory on 08/22/14 10:15.

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/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". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager

**Analytical Results For:**

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

Received:	08/22/2014	Sampling Date:	08/21/2014
Reported:	08/28/2014	Sampling Type:	Soil
Project Name:	MLMU #254	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	OXY - JAL, NM		

**Sample ID: SP 1 @ 1' (H402583-01)**

BTEX 8021B		mg/kg		Analyzed By: ck					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.500	0.500	08/27/2014	ND	1.91	95.4	2.00	1.71	
Toluene*	<0.500	0.500	08/27/2014	ND	1.76	88.0	2.00	2.09	
Ethylbenzene*	<0.500	0.500	08/27/2014	ND	1.97	98.7	2.00	2.45	
<b>Total Xylenes*</b>	<b>1.73</b>	1.50	08/27/2014	ND	5.88	98.0	6.00	2.39	
Total BTEX	<3.00	3.00	08/27/2014	ND					

*Surrogate: 4-Bromofluorobenzene (PID) 108 % 89.4-126*

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	08/26/2014	ND	400	100	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS						S-06
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>GRO C6-C10</b>	<b>959</b>	200	08/26/2014	ND	200	99.9	200	1.16		
<b>DRO &gt;C10-C28</b>	<b>17500</b>	200	08/26/2014	ND	205	103	200	0.134		

*Surrogate: 1-Chlorooctane 430 % 65.2-140*
*Surrogate: 1-Chlorooctadecane 397 % 63.6-154*

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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

Received:	08/22/2014	Sampling Date:	08/21/2014
Reported:	08/28/2014	Sampling Type:	Soil
Project Name:	MLMU #254	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	OXY - JAL, NM		

**Sample ID: SP 1 @ 3' (H402583-02)**

BTEX 8021B		mg/kg		Analyzed By: ck					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.100	0.100	08/27/2014	ND	1.91	95.4	2.00	1.71	
<b>Toluene*</b>	<b>0.103</b>	0.100	08/27/2014	ND	1.76	88.0	2.00	2.09	
<b>Ethylbenzene*</b>	<b>0.227</b>	0.100	08/27/2014	ND	1.97	98.7	2.00	2.45	
<b>Total Xylenes*</b>	<b>0.687</b>	0.300	08/27/2014	ND	5.88	98.0	6.00	2.39	
<b>Total BTEX</b>	<b>1.02</b>	0.600	08/27/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 109 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>80.0</b>	16.0	08/26/2014	ND	400	100	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS						S-06
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>GRO C6-C10</b>	<b>111</b>	50.0	08/26/2014	ND	200	99.9	200	1.16		
<b>DRO &gt;C10-C28</b>	<b>1560</b>	50.0	08/26/2014	ND	205	103	200	0.134		

Surrogate: 1-Chlorooctane 153 % 65.2-140

Surrogate: 1-Chlorooctadecane 177 % 63.6-154

Cardinal Laboratories

\*=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:	08/22/2014	Sampling Date:	08/21/2014
Reported:	08/28/2014	Sampling Type:	Soil
Project Name:	MLMU #254	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	OXY - JAL, NM		

**Sample ID: SP 1 @ 6' (H402583-03)**

BTEX 8021B		mg/kg		Analyzed By: ck					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/27/2014	ND	1.91	95.4	2.00	1.71	
Toluene*	<0.050	0.050	08/27/2014	ND	1.76	88.0	2.00	2.09	
Ethylbenzene*	<0.050	0.050	08/27/2014	ND	1.97	98.7	2.00	2.45	
Total Xylenes*	<0.150	0.150	08/27/2014	ND	5.88	98.0	6.00	2.39	
Total BTEX	<0.300	0.300	08/27/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 106 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>560</b>	16.0	08/26/2014	ND	400	100	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/26/2014	ND	200	99.9	200	1.16	
<b>DRO &gt;C10-C28</b>	<b>211</b>	10.0	08/26/2014	ND	205	103	200	0.134	

Surrogate: 1-Chlorooctane 126 % 65.2-140

Surrogate: 1-Chlorooctadecane 142 % 63.6-154

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Celey D. Keene, Lab Director/Quality Manager

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Received:	08/22/2014	Sampling Date:	08/21/2014
Reported:	08/28/2014	Sampling Type:	Soil
Project Name:	MLMU #254	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	OXY - JAL, NM		

**Sample ID: SP 1 @ 9' (H402583-04)**

BTEX 8021B		mg/kg		Analyzed By: ck					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/27/2014	ND	1.89	94.6	2.00	2.67	
Toluene*	<0.050	0.050	08/27/2014	ND	1.74	87.0	2.00	2.01	
Ethylbenzene*	<0.050	0.050	08/27/2014	ND	1.99	99.5	2.00	3.12	
Total Xylenes*	<0.150	0.150	08/27/2014	ND	5.95	99.2	6.00	3.35	
Total BTEX	<0.300	0.300	08/27/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 105 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>1170</b>	16.0	08/26/2014	ND	400	100	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/26/2014	ND	200	99.9	200	1.16	
<b>DRO &gt;C10-C28</b>	<b>13.9</b>	10.0	08/26/2014	ND	205	103	200	0.134	

Surrogate: 1-Chlorooctane 117 % 65.2-140

Surrogate: 1-Chlorooctadecane 131 % 63.6-154

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Reported:	08/28/2014	Sampling Type:	Soil
Project Name:	MLMU #254	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	OXY - JAL, NM		

**Sample ID: SP 1 @ 12' (H402583-05)**

BTEX 8021B		mg/kg		Analyzed By: ck					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/27/2014	ND	1.89	94.6	2.00	2.67	
Toluene*	<0.050	0.050	08/27/2014	ND	1.74	87.0	2.00	2.01	
Ethylbenzene*	<0.050	0.050	08/27/2014	ND	1.99	99.5	2.00	3.12	
Total Xylenes*	<0.150	0.150	08/27/2014	ND	5.95	99.2	6.00	3.35	
Total BTEX	<0.300	0.300	08/27/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 106 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>928</b>	16.0	08/26/2014	ND	400	100	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/26/2014	ND	200	99.9	200	1.16	
DRO >C10-C28	<10.0	10.0	08/26/2014	ND	205	103	200	0.134	

Surrogate: 1-Chlorooctane 122 % 65.2-140

Surrogate: 1-Chlorooctadecane 135 % 63.6-154

Cardinal Laboratories

\*=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:	08/22/2014	Sampling Date:	08/21/2014
Reported:	08/28/2014	Sampling Type:	Soil
Project Name:	MLMU #254	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	OXY - JAL, NM		

**Sample ID: SP 1 @ 15' (H402583-06)**

BTEX 8021B		mg/kg		Analyzed By: ck					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/27/2014	ND	1.89	94.6	2.00	2.67	
Toluene*	<0.050	0.050	08/27/2014	ND	1.74	87.0	2.00	2.01	
Ethylbenzene*	<0.050	0.050	08/27/2014	ND	1.99	99.5	2.00	3.12	
Total Xylenes*	<0.150	0.150	08/27/2014	ND	5.95	99.2	6.00	3.35	
Total BTEX	<0.300	0.300	08/27/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 105 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>1020</b>	16.0	08/26/2014	ND	400	100	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/26/2014	ND	200	99.9	200	1.16	
<b>DRO &gt;C10-C28</b>	<b>13.1</b>	10.0	08/26/2014	ND	205	103	200	0.134	

Surrogate: 1-Chlorooctane 130 % 65.2-140

Surrogate: 1-Chlorooctadecane 143 % 63.6-154

Cardinal Laboratories

\*=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:	08/22/2014	Sampling Date:	08/21/2014
Reported:	08/28/2014	Sampling Type:	Soil
Project Name:	MLMU #254	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	OXY - JAL, NM		

**Sample ID: SP 1 @ 18' (H402583-07)**

BTEX 8021B		mg/kg		Analyzed By: ck					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/27/2014	ND	1.89	94.6	2.00	2.67	
Toluene*	<0.050	0.050	08/27/2014	ND	1.74	87.0	2.00	2.01	
Ethylbenzene*	<0.050	0.050	08/27/2014	ND	1.99	99.5	2.00	3.12	
Total Xylenes*	<0.150	0.150	08/27/2014	ND	5.95	99.2	6.00	3.35	
Total BTEX	<0.300	0.300	08/27/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 105 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>416</b>	16.0	08/26/2014	ND	400	100	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/26/2014	ND	200	99.9	200	1.16	
<b>DRO &gt;C10-C28</b>	<b>16.1</b>	10.0	08/26/2014	ND	205	103	200	0.134	

Surrogate: 1-Chlorooctane 116 % 65.2-140

Surrogate: 1-Chlorooctadecane 128 % 63.6-154

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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:	08/22/2014	Sampling Date:	08/21/2014
Reported:	08/28/2014	Sampling Type:	Soil
Project Name:	MLMU #254	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	OXY - JAL, NM		

**Sample ID: SP 1 @ 19' (H402583-08)**

BTEX 8021B		mg/kg		Analyzed By: ck					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/27/2014	ND	1.89	94.6	2.00	2.67	
Toluene*	<0.050	0.050	08/27/2014	ND	1.74	87.0	2.00	2.01	
Ethylbenzene*	<0.050	0.050	08/27/2014	ND	1.99	99.5	2.00	3.12	
Total Xylenes*	<0.150	0.150	08/27/2014	ND	5.95	99.2	6.00	3.35	
Total BTEX	<0.300	0.300	08/27/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 105 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>224</b>	16.0	08/26/2014	ND	400	100	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/26/2014	ND	200	99.9	200	1.16	
<b>DRO &gt;C10-C28</b>	<b>11.1</b>	10.0	08/26/2014	ND	205	103	200	0.134	

Surrogate: 1-Chlorooctane 127 % 65.2-140

Surrogate: 1-Chlorooctadecane 139 % 63.6-154

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\*=Accredited Analyte

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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.
- 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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Celey D. Keene, Lab Director/Quality Manager



**CARDINAL LABORATORIES**

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

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

**BILL TO**

**ANALYSIS REQUEST**

Company Name: BBC International, Inc.

Project Manager: Cliff Brunson

Address: P. O. Box 805

City: Hobbs

Phone #: 575-397-6388

Project #:

Project Name: MPM # 254

Project Location: 121

Sample Name: 1st Driveway

FOR LAB USE ONLY

P.O. #:

Company:

Attn:

Address:

City:

State:

Phone #:

Fax #:

PRESEV

ACID/BASE:

ICE / COOL

OTHER:

MATRIX

SLUDGE

OIL

SOIL

WASTEWATER

GROUNDWATER

# CONTAINERS

(G)RAB OR (C)OMP

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE / COOL	OTHER:	DATE	TIME	ANALYSIS REQUEST
H402563	S0101		1			X							8-21	900	CV - TPH BTEX
	023		1			X							950		
	01		1			X							101		
	09		1			X							1255		
	012		1			X							1377		
	015		1			X							157		
	018		1			X							222		
	019		1			X							239		

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Relinquished By: [Signature]

Date: 8/14/14

Received By: [Signature]

Date: 10:15

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

REMARKS:

Relinquished By: [Signature]

Date:

Received By: [Signature]

Date:

Delivered By: (Circle One)

Sampler - UPS - Bus - Other:

Sample Condition Cool Intact  Yes  No  Yes  No

CHECKED BY: [Signature]

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

#54

## Kathy Purvis

---

**From:** Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>  
**Sent:** Wednesday, October 15, 2014 9:41 AM  
**To:** Cliff P. Brunson  
**Cc:** C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** RE: OXY - MLMU #254 - Remediation Plan

Aloha Mr. Brunson et al,  
Thank you for sending in this plan.  
Please consider this the OCD notice of receipt.

Based on the sample data provided OCD conditionally approves the plan with the following amendments-  
-The use of clay or caliche liners with contaminants other than ~Cl is no longer being approved, BLM suggests the use of plastic for hydrocarbon contaminants. Hence, please replace the clay with plastic at the depth indicated.  
-BLM needs to approve the plan (including the amended plan as suggested above), please include them in the original emails so that BLM is aware of the discussions from the start. OCD and BLM are working closely together on all sites of interest to the BLM and hence this will make our negotiations much easier. If the release is on pad- Mr. Jim Amos is the BLM contact, while offsite locations in pasture are handled by both Mr. Jeffery Robertson and Mr. Solomon Hughes. (Ms. Van Curen is longer with the agency, please update your contacts accordingly).

As a courtesy, I request that you include the RP number in the email please. On a sheet summarizing the work plan attached to the diagram/lab results pages is even better as this makes tracing the work plan easier online when we upload it.

Lastly, please send these plans in piecemeal, 5 or so as a bunch at the most. My email folder, unlike me predecessor's, tends to get very full and I want to ensure that all your documents and others from the oil field arrive with minimal difficulty.

Thank you very much for your assistance and continued hard work.

Please let me know if you have any questions or concerns.

Mahalo

-Doc

Tomáš 'Doc' Oberding, PhD  
Environmental Specialist – New Mexico Oil Conservation Division  
Energy, Minerals and Natural Resources Department  
1625 N. French Dr.  
Hobbs, NM 88240  
(O): (575) 393-6161 ext 111  
(C): 575-370-3180  
(F): (575) 393-0720  
E-Mail: [tomas.oberding@state.nm.us](mailto:tomas.oberding@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>

---

**From:** Cliff P. Brunson [<mailto:cbrunson@bbcinternational.com>]  
**Sent:** Tuesday, October 14, 2014 7:14 PM  
**To:** Oberding, Tomas, EMNRD  
**Cc:** C J Summers; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** OXY - MLMU #254 - Remediation Plan

Tomas,

This e-mail is to confirm our conversation on September 19, 2014 about the remediation plan for the above referenced site. I have attached the materials that we used in our discussion. As discussed, Oxy will excavate to a depth of 4 feet in the entire leak area as depicted on the attached site diagram then a clay liner will be installed in the excavation. The site will then be backfilled with clean soil.

If you would please e-mail your concurrence with this remediation plan, it would be greatly appreciated.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS  
President  
BBC International, Inc.  
World-Wide Environmental Specialists  
Mailing Address:  
P. O. Box 805  
Hobbs, NM 88241-0805 USA  
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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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