

FLWT  
0520155370

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, 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 Drive  
Santa Fe, NM 87505

Form C-141  
Revised October 10, 2003

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name: <b>BTA Oil Producers</b>	Contact: <b>Pam Inskeep</b>
Address: <b>104 S. Pecos, Midland, TX 79701</b>	Telephone No. <b>(432) 682-3753</b>
Facility Name: <b>French #3 SWD</b>	Facility Type: <b>Tank Battery</b>
Surface Owner: <b>BLM</b>	Mineral Owner
Lease No. <b>NMNM078148</b>	

LOCATION OF RELEASE

Unit Letter <b>H</b>	Section <b>24</b>	Township <b>T18S</b>	Range <b>R32E</b>	Feet from the <b>1980</b>	North/South Line <b>North</b>	Feet from the <b>510</b>	East/West Line <b>East</b>	County <b>Lea</b>
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Latitude: **32.73537**

Longitude: **103.71243**

NATURE OF RELEASE

Type of Release <b>field gas, salt water and crude Salt Water Spill</b>	Volume of Release <b>approx. 200- 300 bbl salt water; approx. 10 bbl oil</b>	Volume Recovered <b>approx. 140 bbls of liquid</b>
Source of Release <b>Tank Valve</b>	Date and Hour of Occurrence <b>7/12/2005 9:00 am</b>	Date and Hour of Discovery <b>7/12/05 11:00 am</b>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <b>Hobbs OCD</b>	
By Whom? <b>Pam Inskeep</b>	Date and Hour <b>7/12/2005 11:55 am</b>	
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.* <b>The valve for the load line of the tank was opened by livestock. Approx. 200 - 300 bbl of salt water with oil on top spilled out into an adjacent pasture. Approximately 140 bbl of liquid was removed by vacuum truck. Closest residence is 10 miles away.</b>		
Describe Area Affected and Cleanup Action Taken <b>The boundary of the spill is approximately 200 feet by 140 feet. Approximately 140 bbl of liquid was removed by vacuum truck. The Site will be delineated for impact and remediated per OCD guidelines. The chloride concentration of the spilled water is reported as 102,977 mg/L. A copy of the laboratory analytical data is attached.</b>		
Describe General Conditions Prevailing (Temperature, Precipitation, etc.)* <b>100 degrees, Dry, No wind or breeze.</b>		
I hereby certify that the information given above is true and complete to the best of my knowledge and belief.		<b>OIL CONSERVATION DIVISION</b>
Signature: <i>Pam Inskeep</i>		Approved by <input type="checkbox"/> District Supervisor:
Printed Name: <b>Pam Inskeep</b>		Approval Date:
Title: <b>Regulatory Administrator</b>		Expiration Date:
Date: <b>7/20/05</b>		Conditions of Approval:
Phone: (432) 682-3753		Attached <input type="checkbox"/>

\* Attach Additional Sheets If Necessary



PARTNERS  
CARLTON BEAL, JR.  
BARRY BEAL  
SPENCER BEAL  
KELLY BEAL  
BARRY BEAL, JR.  
STUART BEAL  
ROBERT DAVENPORT, JR.

**BTA OIL PRODUCERS**

104 SOUTH PECOS  
MIDLAND, TEXAS 79701  
432-682-3753  
FAX 432-683-0811

**GULF COAST DISTRICT**  
FOUR GREENSPRING PLAZA  
16945 NORTHCHASE DRIVE, STE. 1600  
HOUSTON, TEXAS 77060  
PH. 281-872-5022 FAX 281-872-5054

**ROCKY MOUNTAIN DISTRICT**  
600 17TH STREET, STE. 2230 SOUTH  
DENVER, CO 80202  
PH. 303-534-4404 FAX 303-534-4661

July 18, 2005

Re: Acting as Agent for  
BTA Oil Producers

**NEW MEXICO OIL CONSERVATION DIVISION**

District I  
1625 N. French Drive  
Hobbs, NM 88240

Gentlemen:

BTA Oil Producers hereby states that Larson and Associates, Inc., 507 N. Marienfeld, Suite 202, Midland, TX 79701 has been enlisted acting as agent of BTA regarding clean-up and impact of a spill located at our 9004 JV-P French #3 injection well located in Sec. 34, T18S-R32E, Lea County, NM and is authorized to act on behalf of and in the best interests of our organization in dealings with the NMOCD. We respectfully submit that Larson and Associates may negotiate for and sign NMOCD documents on behalf of BTA Oil Producers as acting agent.

Should further information be required, please advise.

Respectfully,

Pam Inskeep  
Regulatory Administrator

BAKER  
Performance Chemicals  
WATER ANALYSIS REPORT

Lab ID No. : 021891-14

Analysis Date: February 18, 1991

Company : BTA Oil Producers  
Field :  
Lease/Unit : French  
Well ID. : No. 1  
Sample Loc.:

Sampled By : Pro-Kem, Inc.  
Sample Date: 11-February-1991  
Salesperson: Gerald Phillips  
Formation :  
Location : Lovington, N. M.

CATIONS	MG/L	MEQ/L	ANIONS	MG/L	MEQ/L
Calcium as Ca++	8,582	429	Hydroxyl as OH-	0	0
Magnesium as Mg++	1,596	131	Carbonate as CO3=	0	0
Sodium as Na+ (Calc)	54,143	2,354	Bicarbonate as HCO3-	187	3
Barium as Ba++	Below 10		Sulfate as SO4=	300	6
Oil Content	0		Chloride as Cl-	102,977	2,905

Total Dissolved Solids, Calculated: 167,784 mg/L.

Calculated Resistivity: 0.018 ohm-meters  
mg/L. Hydrogen Sulfide: 0  
mg/L. Carbon Dioxide: 160  
mg/L. Dissolved Oxygen: Not Determined

pH: 7.000  
Specific Gravity 60/60 F.: 1.115  
Saturation Index @ 80 F.: +0.868  
@ 140 F.: +1.828

Total Hardness: 27,968 mg/L. as CaCO3  
Total Iron: 42.00 mg/L. as Fe++

PROBABLE MINERAL COMPOSITION			
	COMPOUND	MG/L	MEQ/L
	Ca(HCO3)2	249	3.1
	CaSO4	425	6.3
Calcium Sulfate Scaling Potential Not Present	CaCl2	23,298	419.8
	Mg(HCO3)2	0	0.0
Estimated Temperature of Calcium Carbonate Instability is 56 F.	MgSO4	0	0.0
	MgCl2	6,228	130.8
	NaHCO3	0	0.0
	Na2SO4	0	0.0
	NaCl	137,616	2,354.0

*Randy Field*  
Analyst 02:33 PM

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Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name: BTA Oil Producers	Contact: Pam Inskeep
Address: 104 S. Pecos, Midland, TX 79701	Telephone No. (432) 682-3753
Facility Name: French #3 SWD	Facility Type: Tank Battery

Surface Owner: BLM	Mineral Owner	Lease No. NMNM078148
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LOCATION OF RELEASE

Unit Letter H	Section 24	Township T18S	Range R32E	Feet from the 1980	North/South Line North	Feet from the 510	East/West Line East	County Lea
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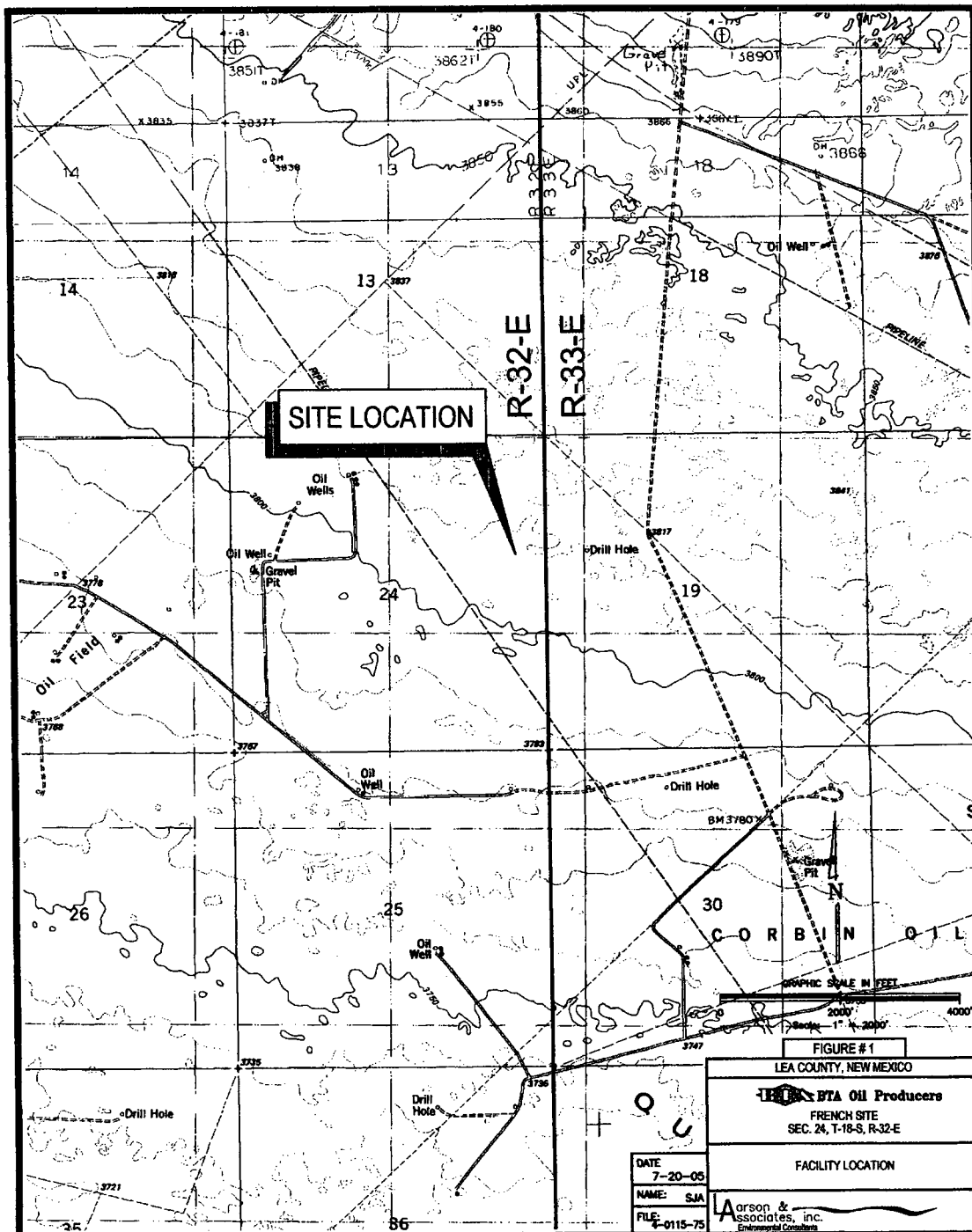
Latitude: 32.73537

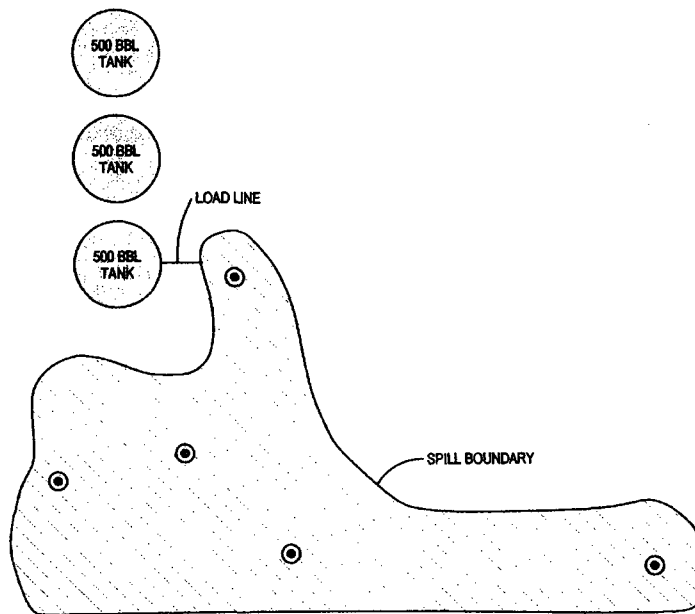
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NATURE OF RELEASE

Type of Release field gas, salt water and crude Salt Water Spill	Volume of Release approx. 200- 300 bbl salt water; approx. 10 bbl oil	Volume Recovered approx. 140 bbbls of liquid	
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By Whom? Pam Inskeep	Date and Hour 7/12/2005 11:55 am		
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I hereby certify that the information given above is true and complete to the best of my knowledge and belief.		OIL CONSERVATION DIVISION	
Signature: <i>Pam Inskeep</i>		Approved by District Supervisor:	
Printed Name: Pam Inskeep			
Title: Regulatory Administrator		Approval Date:	Expiration Date:
Date: 7/20/05	Phone: (432) 682-3753	Conditions of Approval:	Attached <input type="checkbox"/>

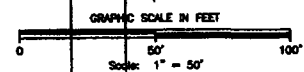
\* Attach Additional Sheets If Necessary





**LEGEND**

● - PROPOSED SOIL BORINGS



**FIGURE #2**

LEA COUNTY, NEW MEXICO

**ETA Oil Producers**

FRENCH SITE  
SEC. 24, T-18-S, R-32-E

FACILITY SITE

DATE  
7-20-05

NAME: SJA

FILE:  
4-0115-75

**Larson & Associates, Inc.**  
Environmental Consultants

July 19, 2005

Larry Johnson  
New Mexico Oil Conservation Division – District I  
Energy, Minerals and Natural Resources Department  
1625 N. French Drive  
Hobbs, New Mexico 88240

**Re: Spill Investigation Workplan, BTA Oil Producers, Unit Letter H (SE/4, NE/4), Section 24, Township 18 South, Range 32 East, Lea County, New Mexico (Latitude: 32.73537 / Longitude: 103.71243)**

Dear Mr. Johnson:

BTA Oil Producers (BTA) has retained Larson and Associates, Inc. (LA) to investigate potential impacts to soil from a salt water spill that occurred on July 12, 2005, from a salt water tank located in the southeast quarter (SE/4) of the northeast quarter (NE/4), Section 24, Township 18 South, Range 32 East, Lea County, New Mexico (Site). The spill occurred when the valve for the load line off the tank was opened by livestock. Approximately 200 to 300 barrels (bbl) of produced water was released, and approximately 140 bbl of free liquid was picked up with a vacuum truck. The spill area covered approximately 140 x 200 feet, and BTA submitted a Release Notification and Corrective Action form (Form C-141) to the New Mexico Oil Conservation Division (NMOCD) on July 12, 2005. Figure 1 shows the location of the Site.

On July 15, 2005, BTA received a letter from the NMOCD, denying their submittal of the C-141. Larson and Associates, Inc. (LA) is pleased to re-submit the C-141 form, along with a proposal to conduct an investigation of the impacted soil at the Site.

#### **Proposed Investigation**

LA proposes to collect soil samples using direct-push technology (Terraprobe®) to assess the vertical limits of the spill for defining the area of remediation. Six (6) soil borings will be drilled at the Site, to a depth of approximately 20 feet below ground surface (bgs) or until refusal is encountered. Samples will be collected from the surface and every five (5) feet thereafter (i.e., 0-1', 5-6', 10-11', etc.), placed in clean glass sample jars, labeled, chilled in an ice chest and delivered under chain-of-custody control to Environmental Lab of Texas, located in Odessa, Texas, for laboratory analysis.

A portion of each sample will be collected in a separate glass sample jar for soil headspace gas analysis using the ambient temperature headspace (ATH) method. The ATH method involves placing a soil sample in a clean glass sample jar to approximately

¾ full, sealing the top of the jar with aluminum foil before replacing the cap. After approximately 15 minutes at ambient temperature the concentration of organic vapors in the headspace of the sample jar is measured with a photoionization detector (PID). The probe of the PID is passed through the aluminum foil and measures the concentration of ionizable hydrocarbons in the headspace vapors. The NMOCD allows a PID measurement of 100 parts per million (ppm) or less to be substituted for a laboratory analysis of benzene, toluene, ethylbenzene, and xylene (commonly referred to as BTEX). The NMOCD usually requires laboratory confirmation for BTEX when a PID measurement exceeds 100 ppm. However, headspace analysis cannot replace a laboratory analysis for total petroleum hydrocarbons (TPH).

Based on published literature (1961) and well records of the New Mexico State Engineer, groundwater occurs at approximately 117.28 feet bgs in the well located nearest the Site. No domestic water wells are located within 1,000 feet of the site. The NMOCD has established soil remediation action levels (RRAL) for benzene, total BTEX and TPH resulting from spills of natural gas liquids ("Guidelines for Remediation of Leaks, Spills and Releases, August 13, 1993"). Remediation levels for benzene, total BTEX and TPH were calculated using the following NMOCD criteria:

Criteria	Result	Ranking Score
Depth-to-Groundwater	>100 Feet	0
Wellhead Protection Area	No	0
Distance to Surface Water Body	>1000 Horizontal Feet	0
		<b>Total: 0</b>

The following RRALs have been assigned based on NMOCD criteria:

**Benzene**                    **10 mg/kg**  
**Total BTEX**            **50 mg/kg**  
**TPH**                        **5,000 mg/kg**

The NMOCD does not have an RRAL for chloride, but typically recommends an RRAL of 250 mg/kg.

All samples collected from each boring will be analyzed for chloride, and the sample from each boring that exhibits the highest PID reading will be analyzed for TPH. The samples will also be analyzed for BTEX if PID readings exceed 100 ppm. The analysis will be compared to the RRALs established by the NMOCD to determine the need for remediation. If the analytical results from the deepest collected samples report a chloride concentration exceeding the NMOCD recommended RRAL, a synthetic precipitation leaching potential (SPLP) analysis will be conducted in order to determine the potential



Mr. Larry Johnson  
July 19, 2005  
Page 3

of a groundwater impact. A geologic log will be prepared for each boring, and an Investigation Report will be submitted to the NMOCD.

Sampling equipment will be thoroughly cleaned between uses to minimize cross-contamination. Hand tools will be cleaned using a solution of laboratory-grade detergent and potable water, and rinsed with distilled water. The borings will be filled with bentonite.

Please feel free to call Mr. Royce Boyce at (432) 682-3753 or me at (432) 687-0901 if you have any questions or need additional information. We may also be reached by email at [rboyce@btaoil.com](mailto:rboyce@btaoil.com) or [cindy@laenvironmental.com](mailto:cindy@laenvironmental.com).

Sincerely,  
***Larson and Associates, Inc.***

Cindy K. Crain, P.G.  
Project Manager

## Figures

Microsoft Access - [Administrative Applications/Orders]

File Edit RDBMS Reports View Records Admin Window Help

Preview/Print Permit Administrative Applications/Orders

Basic Application and Log-In Data

Application No: pLWAD520155-BS Application Type: 1R - Remediation Permit - Hobbs Order No: 24

Applicant: BTA OIL PRODUCERS

Product:

Address:

City:

State:

Zip:

County:

Operator:

Guarantor:

Amount:

Typist:

Status:

GuarBndNo:

Reviewer: Johnson

Officer: Hobbs

Inspector: Hobbs

SLD:

Permit Level:

Environment:

LOG BOOK | EVENTS | WELLS (Non-ONGARD data to the right) | POOLS | MULTI-WELL | PROPERTY | FACILITY/BONDS | AMEND/ORD LINK | NXT ORD #

Facility: BTA French #8 SWD Tank Battery

Bond No:

Cert Mail No:

Dt Eff:

UL-S-T-R: H-24-18 S-32 E

County: Lea

Operator:

Dt Exp:

Directions:

Guarantor:

Dt Rel:

Amount:

Typist:

Status:

GuarBndNo:

Well permit and technical data

Record: 211 of 211 (Filtered)

Form View

Microsoft Access - [RBDMS Surface Facilities Data Module]

File Edit RBDMS Reports View Records Admin Window Help

Inspect Facility Surface Facilities Date Rec: 11/03/2002 Facilities GIS

Facility ID: ILWJ0520155370 Facility Name: BTA French #3 SWD Tank Battery UI: H 24 18 S 32 E

Form No: Tank Battery Stat: A Count: Lea State: 30

Disp. Mth: BTA OIL PRODUCERS Lst: 32.735370 Long: 1.037124

D: Open: 07/20/2005 Vtr Vol: 0

A: Closed: Permits on this facility: Env. Inspections

E: W/Deav: S: Sump Over: Location (lat/lon): GWA Depth: 75 GWA Impact: Dist: GWA C: Class V?

Pits Tanks Sumps Contacts

Pit No: Pit Type: Status: Dt Apprv: Dt Open: 6 Mt Ext:

Denied? ☐ Close Apprv'd? ☐ Close Denied? ☐ Not Built? ☐ Dt Regist: Dt Close:

Guide Lines? ☐ Const Mat: Fluid Type: Site Rank: Dt Close:

Leak Detect? ☐ 041504 Prior? ☐ Salt Sect? ☐ Mud >9.5#? ☐ To Remain? ☐ Flds Remvd? ☐ Dewater? ☐ Lined? ☐

Length: ft Width: ft Depth: ft Capacity: bbls Chlor: ppm TDS: ppm

OCD Remediation Action Levels: Benzene: ppm BTEX: ppm TPH: ppm

Comments:

Record: 14 of 1

Record: 14 of 779

Calculating...

Microsoft Access [INCIDENTS]

File Edit RDBMS Reports View Records Admin Window Help

Inspections Not For Well Incidents

General Spill / Release Photos and Other Linked Images

IncidentNo: mLWJ052015699 Type: Produced Water Release Source of Referral: Bureau of Land Management API Well No: Date: 07/15/2005

Material	Spilled	GAL/BBL	Recover	Lost	Source	Cause
Produced Water	300	BBL	140	160	Other (Specify)	Other
Crude Oil	10	BBL	10	0	Other (Specify)	Other
*		BBL				

Record: 2 of 2

NOTES - Please include in the notes all information on Volume Reaching the Environment, Wildlife Affected, Contacts, Method of Cleanup, Evidence, and Volume Recovered.

Aging Infrastructure: ☐ Area Affected

Dimensions		Areal Extents		Waterway
Wide		Est.	28,000 Sq. Ft.	<input type="checkbox"/>
Long		Calc.	Cu. Ft.	Affected?

Blm on location - OCD not notified initially as required - C-141 submitted and was denied due to errors and lack of pertinent information. Cause was listed as 'cow licked valve open'. Chloride content of produced water reported as 102,977 ppm. Spill areal reported as 200' x 140'.

Record: 22 of 22 (Filtered)

Form View