



Pima Environmental Services, LLC
1601 N. Turner Ste 500
Hobbs, NM 88240
575-964-7740

November 1st, 2021

NMOCD District 2
811 S. First Street
Artesia, NM 88210

Bureau of Land Management
620 East Green Street
Carlsbad, NM 88220

Re: Site Assessment, Remediation, and Closure Report
Forty Niner Ridge Unit #14
API No. 30-015-38563
GPS: Latitude 32.31320 Longitude -103.86963
Unit Letter "I", Sec. 10, T23S, R30E
Eddy County, NM
NMOCD Ref. No. NAPP2116666757

Pima Environmental Services, LLC (Pima) has been contracted by Strata Production Company (Strata) to perform an assessment and remediation activities for crude oil and produced water stains that were discovered by the New Mexico Oil Conservation Division (NMOCD) at the Forty Niner Ridge Unit #14 (FNRU). The initial C-141 was submitted on June 1st, 2021 (Appendix C). This incident was assigned Incident ID NAPP2116666757 by the New Mexico Oil Conservation Division (NMOCD).

Site Characterization

The FNRU is located approximately 26 miles from Loving, NM. This spill site is in Unit Letter "I", Sec. 10, T23S, R30E, Latitude 32.31320 Longitude -103.86963 in Eddy County, NM. Figure 1 references a location map.

Per the New Mexico Bureau of Geology and Mineral Resources, the geology is in the Quaternary Formation – Eolian deposits (Holocene to middle Pleistocene). Interlayered eolian sands and piedmont-slope deposits along the eastern flank of the Pecos River valley, primarily between Roswell and Carlsbad. Typically capped by thin eolian deposits. The soil in this area is made up of Gypsum land-Reeves complex, 0 to 3 percent slopes according to the United States Department of Agriculture Natural Resources Conservation Service soil survey (Appendix B). The drainage courses in this area are excessively drained. There is a medium potential for karst geology to be present around the FNRU #14 (Figure 3).

According to the New Mexico Office of the State Engineer, depth to the nearest groundwater in this area is 179 feet below grade surface (BGS). According to the United States Geological Survey (USGS), the nearest groundwater is 61 feet BGS. The closest waterway is a salt playa located approximately 3.12 miles northwest of this location. See Appendix A for referenced water surveys.

Table 1 NMAC and Closure Criteria 19.15.29

| Depth to Groundwater (Appendix A) | Constituent & Limits | | | | |
|--------------------------------------|----------------------|-------------|-------------|----------|----------|
| | Chlorides | Total TPH | GRO+DRO | BTEX | Benzene |
| <50' | 600 mg/kg | 100 mg/kg | | 50 mg/kg | 10 mg/kg |
| 51-100' | 10,000 mg/kg | 2,500 mg/kg | 1,000 mg/kg | 50 mg/kg | 10 mg/kg |
| >100' | 20,000 mg/kg | 2,500 mg/kg | 1,000 mg/kg | 50 mg/kg | 10 mg/kg |

Reference Figure 2 for a Topographic Map.

Release Information

The Initial C-141 was filed as directed by a letter from NMOCD to Strata on May 20, 2021. Upon initial review and investigation, Strata disputed that any single event or accumulation of events resulted in a stain, leak or "release" which was of Minor or Major nature. They also disputed that any release was improperly "characterized" or "covered". Strata's personnel determined that the release was below the reporting thresholds. The allegation of "covering" is not accurate as Strata personnel used nearby soil or sand to absorb and stabilize non-reportable amounts of liquid. Strata also reported that this facility had undergone upgrade, repairs, and remediation many times. Strata also reported that this site either has been or will be addressed in the near term during routine maintenance and clean up or, as a result of scheduled remedial, recompletion or plugging and abandonment operations on this well or area wells.

Site Assessment

On July 22nd, 2021, Pima Environmental mobilized personnel to the site to assess the area. Pima observed minimal staining around the well head and heater treater as well as around the tank battery. We measured the areas and collected photos.

Remediation Activities

Remediation was previously conducted on April 18 and April 19, 2021. Strata contracted R360 Company, ACD Oilfield Services, and J&R Roustabout Service to remediate the contaminated areas. All contaminated soils were hauled to the R360 Disposal Facility. This remediation action was approved by the NMOCD on June 15, 2021. Documentation of the OCD approval can be found in Appendix E.

On July 22nd, 2021, Pima conducted remedial activities after the assessment. The affected areas were treated with a bioremediation chemical solution. Photographic documentation can be found in Appendix D.

Closure Request

After careful review, Pima requests that this incident, NAPP2116666757, be closed. Strata has complied with the applicable closure requirements set forth in rule 19.15.19.12 NMAC.

Should you have any questions or need additional information, please feel free to contact Tom Bynum at 575-964-7740 or tom@pimaoil.com.

Respectfully,

Tom Bynum

Tom Bynum
Environmental Project Manager
Pima Environmental Services, LLC

Attachments**Figures:**

- 1- Location Map
- 2- Topographic Map
- 3- Karst Map
- 4- Site Map
- 5- Treated Area Map

Appendices:

- Appendix A – Referenced Water Surveys
- Appendix B – Soil Survey and Geological Data
- Appendix C – C-141 Form
- Appendix D – Photographic Documentation
- Appendix E – NMOCD Approved Remediation Work and Closure



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Figures:

1-Location Map

2-Topo Map

3-Karst Map


4-Site Map

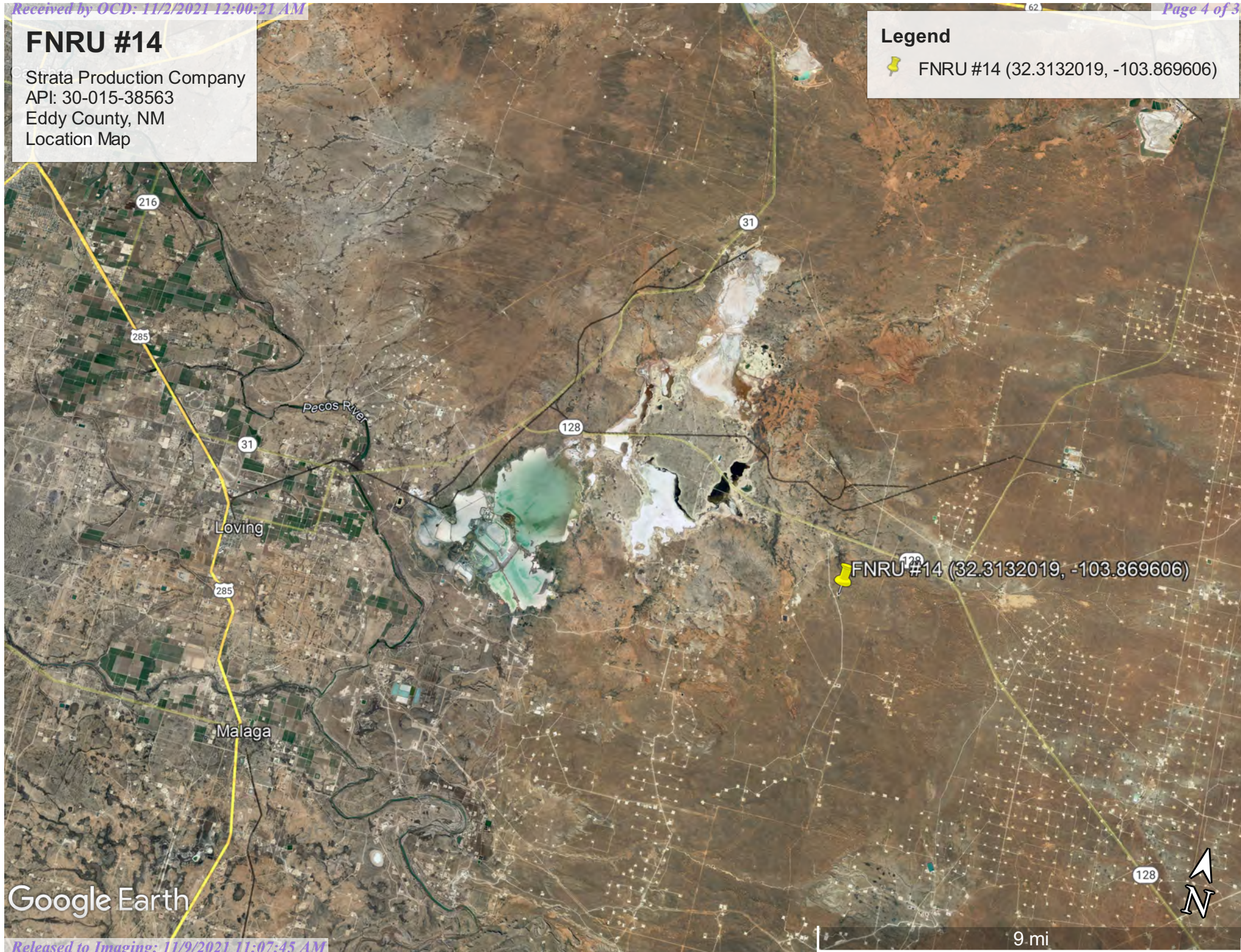
5-Treated Area Map

FNRU #14

Strata Production Company
API: 30-015-38563
Eddy County, NM
Location Map

Legend

 FNRU #14 (32.3132019, -103.869606)




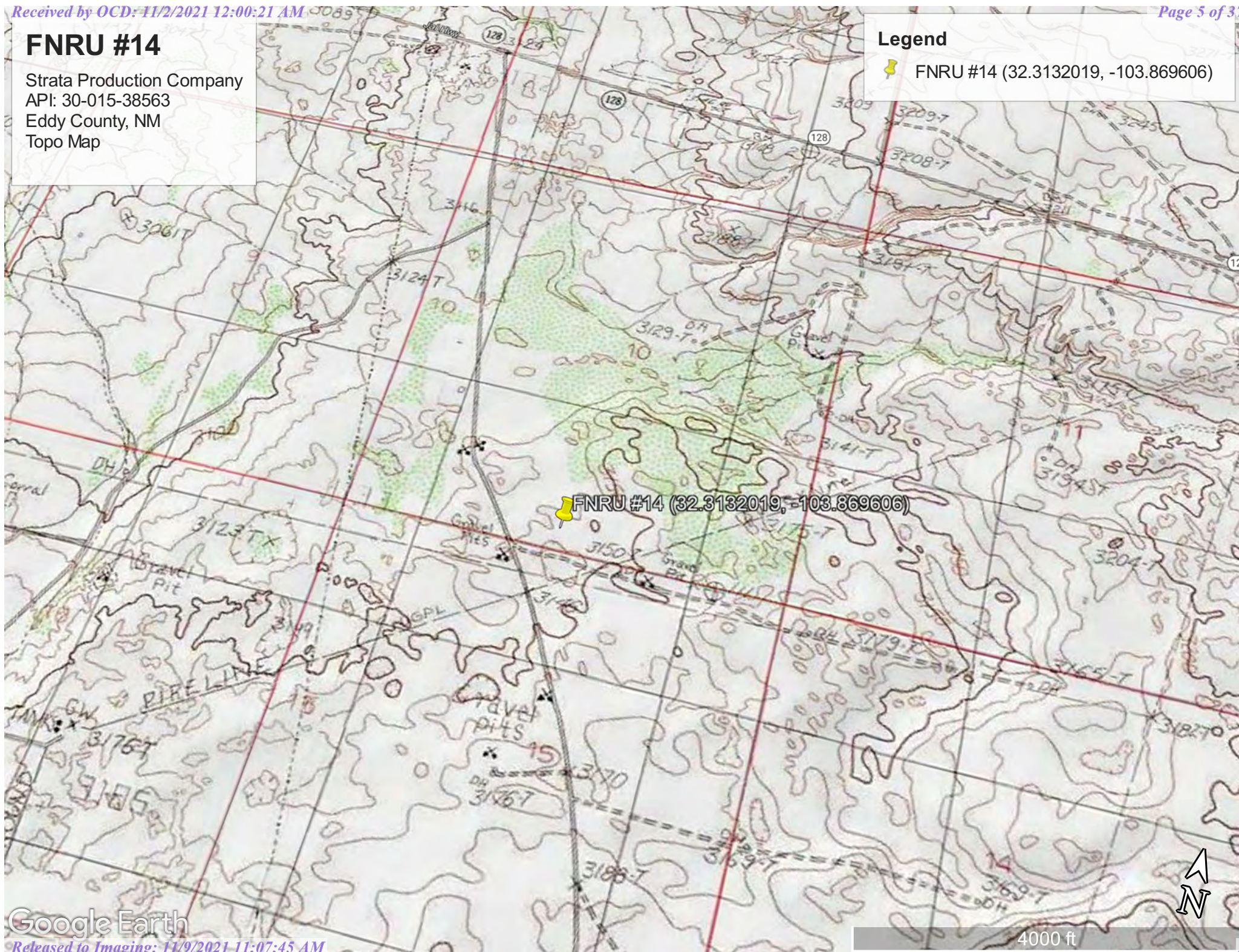
Google Earth

FNRU #14

Strata Production Company
API: 30-015-38563
Eddy County, NM
Topo Map

Legend





 FNRU #14 (32.3132019, -103.869606)




FNRU #14

Strata Production Company
API: 30-015-38563
Eddy County, NM
Karst Map

Legend

-  FNRU #14 (32.3132019, -103.869606)
-  High Karst
-  Low Karst
-  Medium Karst

 FNRU #14 (32.3132019, -103.869606)



FNRU #14

(32.3132019, -103.869606)

Legend

 FNRU #14

 Treated Area

FNRU #14 (32.3132019, -103.869606)




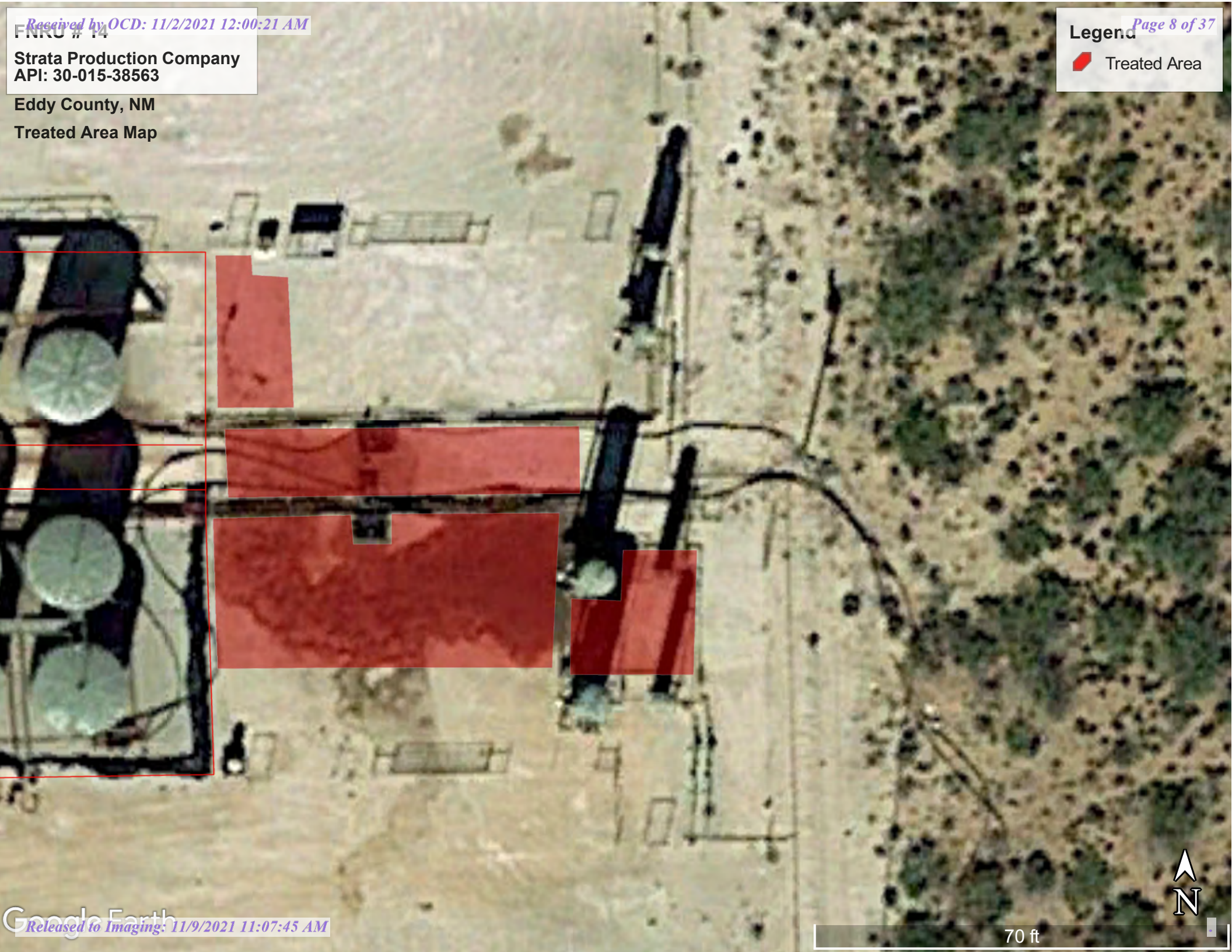
Strata Production Company
API: 30-015-38563

Eddy County, NM

Treated Area Map

Legend

 Treated Area





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Appendix A

Water Surveys:

OSE

USGS

Surface Water Map



(In feet)

| | |
|-------------------------|----------|
| Average Depth to Water: | 36 feet |
| Minimum Depth: | 0 feet |
| Maximum Depth: | 179 feet |

WATER COLUMN/ AVERAGE DEPTH TO WATER



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National Water Information System: Web Interface

USGS Water Resources

Data Category:

Groundwater

Geographic Area:

United States

GO

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- [Full News](#) 

Groundwater levels for the Nation

 Important: [Next Generation Monitoring Location Page](#)

Search Results -- 1 sites found

site_no list =

- 321809103481801

Minimum number of levels = 1

[Save file of selected sites](#) to local disk for future upload

USGS 321809103481801 23S.31E.17.31141

Available data for this site

Groundwater: Field measurements

GO

Eddy County, New Mexico

Hydrologic Unit Code 13060011

Latitude 32°18'11.3", Longitude 103°48'23.4" NAD83

Land-surface elevation 3,326.00 feet above NGVD29

The depth of the well is 354 feet below land surface.

This well is completed in the Other aquifers (N9999OTHER) national aquifer.

This well is completed in the Rustler Formation (312RSLR) local aquifer.

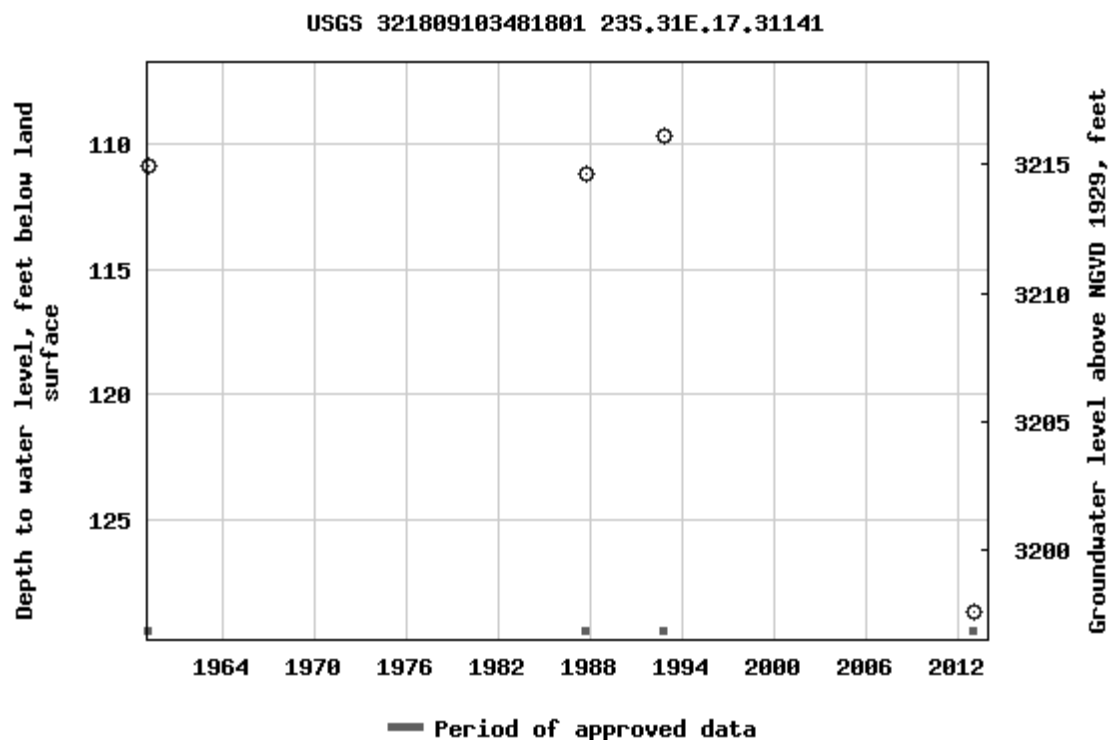
Output formats

[Table of data](#)

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[Reselect period](#)



Breaks in the plot represent a gap of at least one year between field measurements.
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Title: Groundwater for USA: Water Levels

URL: <https://nwis.waterdata.usgs.gov/nwis/gwlevels?>



Page Contact Information: [USGS Water Data Support Team](#)

Page Last Modified: 2021-10-13 16:01:20 EDT

0.56 0.48 nadww01



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National Water Information System: Web Interface

USGS Water Resources

Data Category:

Groundwater

Geographic Area:

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Groundwater levels for the Nation

 Important: [Next Generation Monitoring Location Page](#)

Search Results -- 1 sites found

site_no list =

- 321918103484302

Minimum number of levels = 1

[Save file of selected sites](#) to local disk for future upload

USGS 321918103484302 23S.31E.07.21424 A

Available data for this site

Groundwater: Field measurements

GO

Eddy County, New Mexico

Hydrologic Unit Code 13060011

Latitude 32°19'18", Longitude 103°48'43" NAD27

Land-surface elevation 3,303 feet above NAVD88

This well is completed in the Other aquifers (N9999OTHER) national aquifer.

This well is completed in the Chinle Formation (231CHNL) local aquifer.

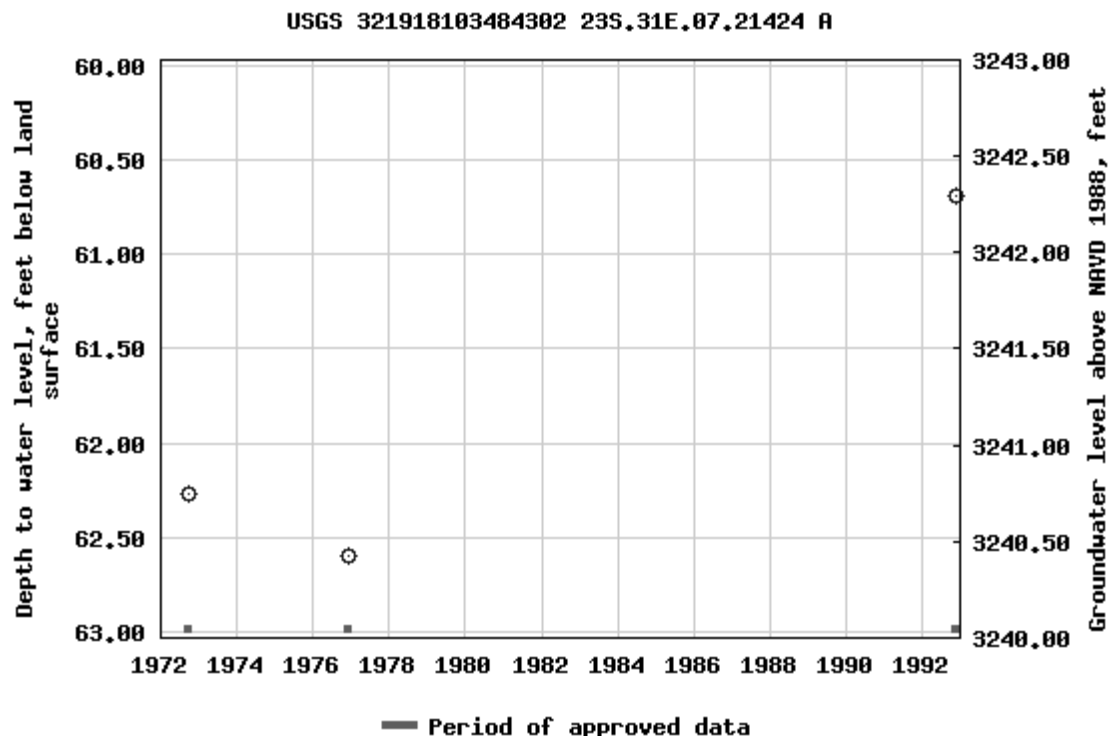
Output formats

[Table of data](#)

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Breaks in the plot represent a gap of at least one year between field measurements.
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Title: Groundwater for USA: Water Levels

URL: <https://nwis.waterdata.usgs.gov/nwis/gwlevels?>



Page Contact Information: [USGS Water Data Support Team](#)

Page Last Modified: 2021-10-13 16:02:46 EDT

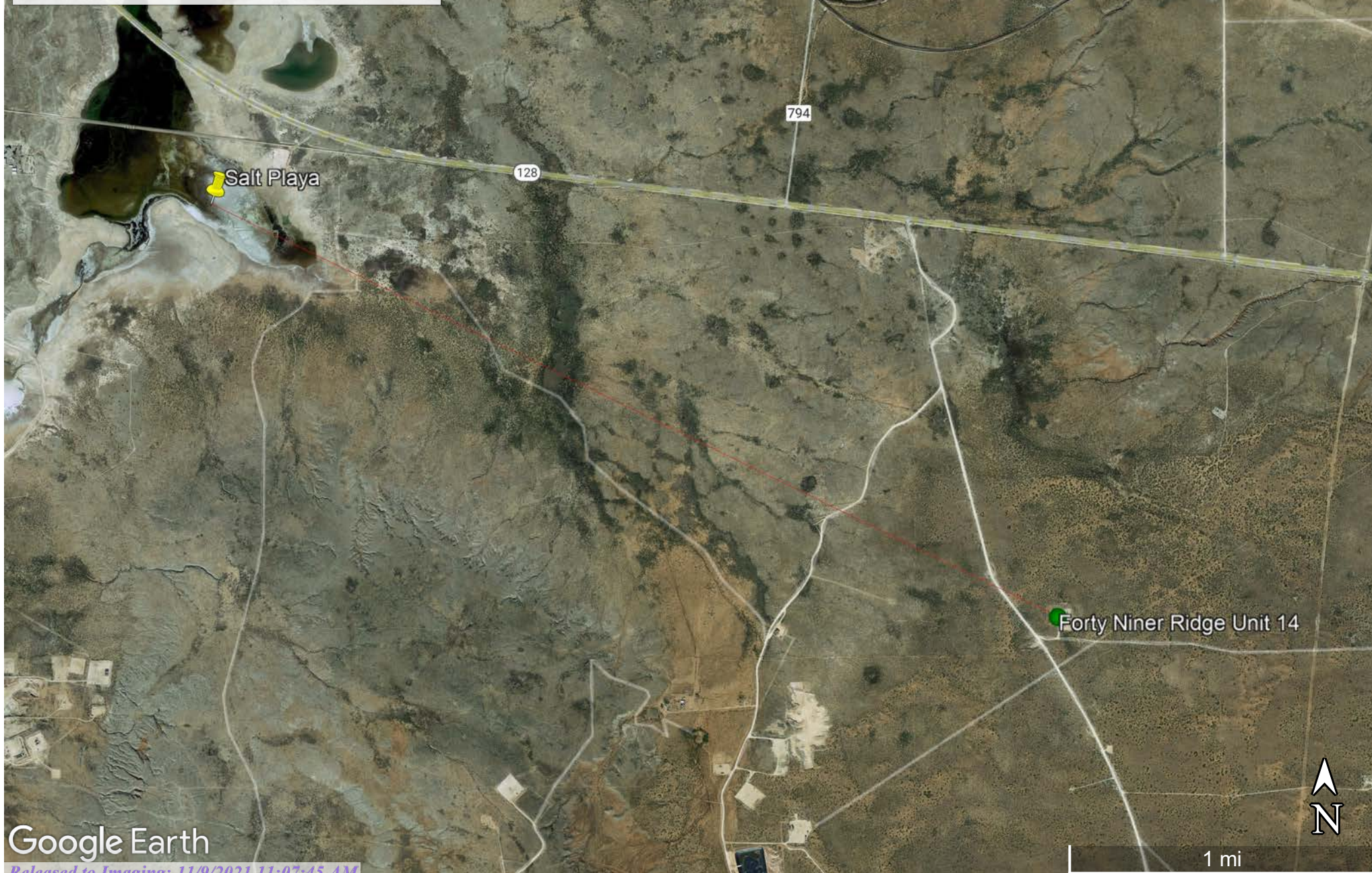
0.54 0.48 nadww02

Forty Niner Ridge Unit 14

Strata Production Company
API #30-015-38563
Eddy County, NM
Surface Water Map

Legend

- 3.12 Miles
- Salt Playa



Google Earth



Pima Environmental Services

Appendix B

Soil Survey & Geological Data

FEMA Flood Map

Map Unit Description: Kermit-Berino fine sands, 0 to 3 percent slopes---Eddy Area, New Mexico

Eddy Area, New Mexico

KM—Kermit-Berino fine sands, 0 to 3 percent slopes

Map Unit Setting

National map unit symbol: 1w4q
Elevation: 3,100 to 4,200 feet
Mean annual precipitation: 10 to 14 inches
Mean annual air temperature: 60 to 64 degrees F
Frost-free period: 190 to 230 days
Farmland classification: Not prime farmland

Map Unit Composition

Kermit and similar soils: 50 percent
Berino and similar soils: 35 percent
Minor components: 15 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Kermit

Setting

Landform: Plains, alluvial fans
Landform position (three-dimensional): Talf, rise
Down-slope shape: Convex, linear
Across-slope shape: Linear
Parent material: Mixed alluvium and/or eolian sands

Typical profile

H1 - 0 to 7 inches: fine sand
H2 - 7 to 60 inches: fine sand

Properties and qualities

Slope: 0 to 3 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Excessively drained
Runoff class: Negligible
Capacity of the most limiting layer to transmit water (Ksat): Very high (20.00 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Maximum salinity: Nonsaline (0.0 to 1.0 mmhos/cm)
Sodium adsorption ratio, maximum: 1.0
Available water supply, 0 to 60 inches: Low (about 3.1 inches)

Interpretive groups

Land capability classification (irrigated): None specified
Land capability classification (nonirrigated): 7e
Hydrologic Soil Group: A
Ecological site: R042XC005NM - Deep Sand
Hydric soil rating: No

Map Unit Description: Kermit-Berino fine sands, 0 to 3 percent slopes---Eddy Area, New Mexico

Description of Berino

Setting

Landform: Plains, fan piedmonts
Landform position (three-dimensional): Riser
Down-slope shape: Convex
Across-slope shape: Linear
Parent material: Mixed alluvium and/or eolian sands

Typical profile

H1 - 0 to 17 inches: fine sand
H2 - 17 to 50 inches: fine sandy loam
H3 - 50 to 58 inches: loamy sand

Properties and qualities

Slope: 0 to 3 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Well drained
Runoff class: Low
Capacity of the most limiting layer to transmit water (Ksat): Moderately high to high (0.60 to 2.00 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Calcium carbonate, maximum content: 40 percent
Maximum salinity: Very slightly saline to slightly saline (2.0 to 4.0 mmhos/cm)
Sodium adsorption ratio, maximum: 1.0
Available water supply, 0 to 60 inches: Moderate (about 7.2 inches)

Interpretive groups

Land capability classification (irrigated): 4e
Land capability classification (nonirrigated): 7e
Hydrologic Soil Group: B
Ecological site: R042XC003NM - Loamy Sand
Hydric soil rating: No

Minor Components

Active dune land

Percent of map unit: 15 percent
Hydric soil rating: No

Data Source Information

Soil Survey Area: Eddy Area, New Mexico
Survey Area Data: Version 17, Sep 12, 2021

National Flood Hazard Layer FIRMette



103°52'29"W 32°19'3"N



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

| | | |
|-----------------------------|--|---|
| SPECIAL FLOOD HAZARD AREAS | | Without Base Flood Elevation (BFE) Zone A, V, A99 |
| | | With BFE or Depth Zone AE, AO, AH, VE, AR |
| | | Regulatory Floodway |
| OTHER AREAS OF FLOOD HAZARD | | 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X |
| | | Future Conditions 1% Annual Chance Flood Hazard Zone X |
| | | Area with Reduced Flood Risk due to Levee. See Notes. Zone X |
| | | Area with Flood Risk due to Levee Zone D |
| | | NO SCREEN Area of Minimal Flood Hazard Zone X |
| OTHER AREAS | | Effective LOMRs |
| | | Area of Undetermined Flood Hazard Zone D |
| GENERAL STRUCTURES | | Channel, Culvert, or Storm Sewer |
| | | Levee, Dike, or Floodwall |
| OTHER FEATURES | | 20.2 Cross Sections with 1% Annual Chance Water Surface Elevation |
| | | 17.5 Cross Sections with 1% Annual Chance Water Surface Elevation |
| | | Coastal Transect |
| | | Base Flood Elevation Line (BFE) |
| | | Limit of Study |
| | | Jurisdiction Boundary |
| | | Coastal Transect Baseline |
| MAP PANELS | | Digital Data Available |
| | | No Digital Data Available |
| | | Unmapped |

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 10/13/2021 at 5:00 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.



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Appendix C

C-141's:

Initial

Final

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

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

| | |
|----------------|----------------|
| Incident ID | NAPP2116666757 |
| District RP | |
| Facility ID | |
| Application ID | |

Release Notification

Responsible Party

| | |
|---|---------------------------------|
| Responsible Party: Strata Production Company | OGRID: 21712 |
| Contact Name: Matt Murphy | Contact Telephone: 720-468-3646 |
| Contact email: matt@stratanm.com | Incident # (assigned by OCD) |
| Contact mailing address: PO Box 1030, Roswell, NM 88202 | |

Location of Release Source

Latitude 32.31320 Longitude -103.86963
(NAD 83 in decimal degrees to 5 decimal places)

| | |
|---------------------------------------|-----------------------------------|
| Site Name: Forty Niner Ridge Unit #14 | Site Type: |
| Date Release Discovered: | API# (if applicable) 30-015-38563 |

| Unit Letter | Section | Township | Range | County |
|-------------|---------|----------|-------|--------|
| N | 10 | 23S | 30E | Eddy |

Surface Owner: ☐ State ☒ Federal ☐ Tribal ☐ Private (Name: _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

| | | |
|--|--|--|
| <input checked="" type="checkbox"/> Crude Oil | Volume Released (bbls) De minimis | Volume Recovered (bbls) 0 |
| <input checked="" type="checkbox"/> Produced Water | Volume Released (bbls) De minimis | Volume Recovered (bbls) 0 |
| | Is the concentration of dissolved chloride in the produced water >10,000 mg/l? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <input type="checkbox"/> Condensate | Volume Released (bbls) | Volume Recovered (bbls) |
| <input type="checkbox"/> Natural Gas | Volume Released (Mcf) | Volume Recovered (Mcf) |
| <input type="checkbox"/> Other (describe) | Volume/Weight Released (provide units) | Volume/Weight Recovered (provide units) |

Cause of Release :

State of New Mexico
Oil Conservation Division

| | |
|----------------|----------------|
| Incident ID | NAPP2116666757 |
| District RP | |
| Facility ID | |
| Application ID | |

| | |
|---|--|
| Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | If YES, for what reason(s) does the responsible party consider this a major release? |
| If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? N/A | |

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

| |
|--|
| <input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately. |
| If all the actions described above have <u>not</u> been undertaken, explain why: 6/1/21 This C-141 is being filed as directed by NMOCD letter and attachments dated May 20, 2021. In general, Strata disputes the allegations, findings, and conclusions. Upon initial review and investigation, Strata disputes that any single event or accumulation of events resulted in a stain, leak or "release" which was of Minor or Major nature. We also dispute that any release was improperly "characterized" or "covered". Strata's personnel determined that the release was below the reporting thresholds. The allegation of "covering" is not accurate as Strata personnel used nearby soil or sand to absorb and stabilize non-reportable amounts of liquid. This facility has undergone upgrade, repairs, and remediation many times. This site either has been or will be addressed in the near term during routine maintenance and clean up or, as a result of scheduled remedial, recompletion or plugging and abandonment operations on this well or area wells. Initial comments regarding pictures: Page 30, Pic 1, 2, 3, & 4 – Light staining around wellhead and production equipment located within containment area. Require additional NMOCD clarification. Page 30, Pic 5 & 6 and Page 31, Pic 1 – These all depict light staining in a lined containment area. Require additional NMOCD clarification. Page 31, Pic 2 – Light staining around production facility located in containment area. Require additional NMOCD clarification. Page 31, Pic 3 – Light staining located in lined containment area. Require additional NMOCD clarification. Page 31, Pic 4 – Depicts area not located at this site. See discussion on API # 30-015-25454, FNRU #3. Strata looks forward to additional clarification and discussion with NMOCD and remains committed to a prompt resolution of all legitimate concerns. |
| Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation. |

State of New Mexico
Oil Conservation Division

Page 3

| | |
|----------------|----------------|
| Incident ID | NAPP2116666757 |
| District RP | |
| Facility ID | |
| Application ID | |

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.

Printed Name: Matt Murphy Title: Operations Manager

Signature: Matt Murphy Date: 06/01/2021

email: matt@stratanm.com Telephone: 720-468-3646

OCD Only

Received by: Ramona Marcus Date: 6/16/2021

| | |
|----------------|----------------|
| Incident ID | NAPP2116666757 |
| District RP | |
| Facility ID | |
| Application ID | |

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

| | |
|---|---|
| What is the shallowest depth to groundwater beneath the area affected by the release? | <u> N/A </u> (ft bgs) |
| Did this release impact groundwater or surface water? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 1000 feet of any other fresh water well or spring? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 300 feet of a wetland? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release overlying a subsurface mine? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release overlying an unstable area such as karst geology? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within a 100-year floodplain? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Did the release impact areas not on an exploration, development, production, or storage site? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: *Each of the following items must be included in the report.*

- ☐ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☐ Field data
- ☐ Data table of soil contaminant concentration data
- ☐ Depth to water determination
- ☐ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☐ Photographs including date and GIS information
- ☐ Topographic/Aerial maps
- ☐ Laboratory data including chain of custody

NOTE: The above items (if required) will be provided after reclamation process is completed. An amended C-141 will be filed if required.

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

State of New Mexico
Oil Conservation Division

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| | |
|----------------|----------------|
| Incident ID | NAPP2116666757 |
| District RP | |
| Facility ID | |
| Application ID | |

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.

Printed Name: Shammy Dennis Title: Administrative Support

Signature: Shammy Dennis Date: 6/1/2021

email: sdennis@stratanm.com Telephone: 575-622-1127 ext. 13

OCD Only

Received by: Ramona Marcus Date: 6/16/2021

| | |
|----------------|----------------|
| Incident ID | NAPP2116666757 |
| District RP | |
| Facility ID | |
| Application ID | |

Remediation Plan

Remediation Plan Checklist: *Each of the following items must be included in the plan.*

- ☐ Detailed description of proposed remediation technique
- ☐ Scaled sitemap with GPS coordinates showing delineation points
- ☐ Estimated volume of material to be remediated
- ☐ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☐ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

NOTE: The above items (if required) will be provided after reclamation process is completed. An amended C-141 will be filed if required.

Deferral Requests Only: *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- ☒ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☒ Extents of contamination must be fully delineated.
- ☒ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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.

Printed Name: Matt Murphy Title: Operations Manager

Signature: Matt Murphy Date: 6/01/2021

email: matt@stratanm.com Telephone: 720-468-3646

OCD Only

Received by: Ramona Marcus Date: 6/16/2021

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: _____ Date: _____

| | |
|----------------|----------------|
| Incident ID | NAPP2116666757 |
| District RP | |
| 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

NOTE: The above items (if required) will be provided after reclamation process is completed.

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: Shammy Dennis Title: Administrative Support

Signature: Shammy Dennis Date: 6/1/2021

email: sdennis@stratanm.com Telephone: 575-622-1127 ext. 13

OCD Only

Received by: Ramona Marcus Date: 6/16/2021

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: Chad Hensley Date: 11/09/2021

Printed Name: Chad Hensley Title: Environmental Specialist Advanced



Pima Environmental Services

Appendix D

Photographic Documentation

Strata Forty Niner Ridge #9,13, &14

API

30-015-35008

30-015-38562

30-015-38563



New Mexico OCD



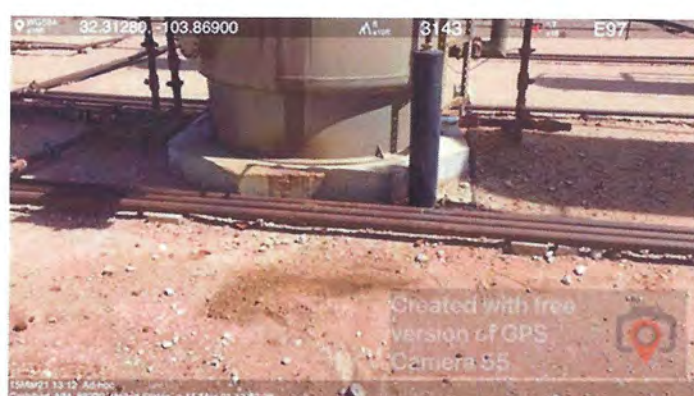
Staining around wellhead on unit #14.



Staining from heater treater.



Staining from heater treater visible with minor scrapings.



Staining around heater treater.



Gravel around tank battery.



Gravel around tank battery, top layer of gravel scraped away.

New Mexico OCD



Gravel around tank battery, second location of top layer of gravel moved as noted from previous slide.



Staining around pump containments and general area.



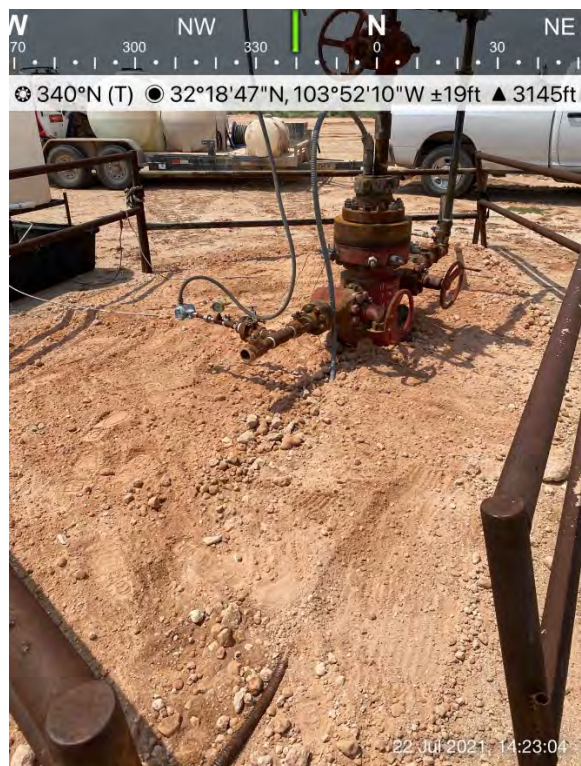
Staining between tanks.

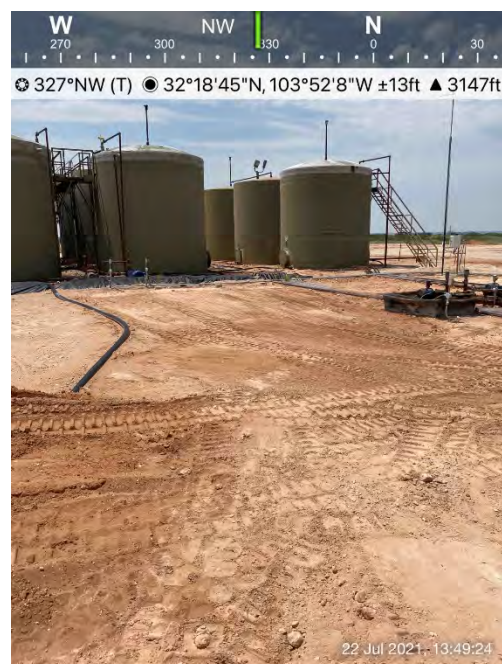


Staining from heater treater visible with minor scrapings.



Post-Treatment









Pima Environmental Services

Appendix E

NMOCD Approved Remediation Work and Closure

| | | | |
|-----------------|---|------------|---------|
| Submission ID: | 32210 | Districts: | Artesia |
| Operator: | [21712] STRATA PRODUCTION CO | Counties: | Eddy |
| Description: | STRATA PRODUCTION CO [21712] Forty Niner Ridge Unit #14 [nAPP2116666757] {Discovery: 02/11/2017, Active, , Federal} | | |
| Status: | APPROVED | | |
| Status Date: | 06/15/2021 | | |
| References (1): | nAPP2116666757 | | |

REMEDIATION WORK AND CLOSURE

Remediation:

Remediation was previously conducted on 4/18/21 by R360 vacuum truck company and ACD Oilfield Services and also on 4/19/21 by J & R Roustabout. All contaminated soil and gravel was hauled to R360 disposal facility. The area is back to OCD specification.

District I

1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720

District II

811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720

District III

1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170

District IV

1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 59061

CONDITIONS

| | |
|--|---|
| Operator: Pima Environmental Services, LLC 1601 N. Turner Hobbs, NM 88240 | OGRID: 329999 |
| | Action Number: 59061 |
| | Action Type: [C-141] Release Corrective Action (C-141) |

CONDITIONS

| Created By | Condition | Condition Date |
|------------|-----------|----------------|
| chensley | None | 11/9/2021 |