



June 6, 2023

**New Mexico Oil Conservation Division**

New Mexico Energy, Minerals, and Natural Resources Department  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

**Re: Revised Remediation Work Plan  
Mesa 8105 JV-P 013H  
Incident Numbers NCH1835547953, NAB1906552791, and NAB1906551740  
Lea County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of BTA Oil Producers, LLC (BTA), has prepared the following *Revised Remediation Work Plan (Revised Work Plan)* as a follow up to the original *Remediation Work Plan (Work Plan)* dated September 25, 2019. This *Revised Work Plan* proposes to complete additional delineation activities at the Mesa 8105 JV-P 013H (Site) in response to the denial of the original *Work Plan* by the New Mexico Oil Conservation Division (NMOCD). In the denial, NMOCD indicated that the impacted soil left in place had not been properly delineated. The following *Revised Work Plan* proposes full lateral and vertical delineation of the impacted soil left in place.

**SITE DESCRIPTION AND RELEASE SUMMARY**

The Site is located in Unit P, Section 1, Township 26 South, Range 32 East, in Lea County, New Mexico (32.06584°, -103.62410°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM).

On November 24, 2018, a malfunction on a compressor caused the slop tank to overflow. Approximately 20 barrels (bbls) of produced water and 10 bbls of condensate were released. A vacuum truck was dispatched to the Site to recover free-standing fluids; approximately 5 bbls of produced water and 5 bbls of condensate were recovered. BTA reported the release to the NMOCD on a Release Notification Form C-141 (Form C-141) on November 26, 2018. The release was assigned Remediation Permit Number (RP) Number 2RP-5289 and Incident Number NCH1835547953.

On February 8, 2019, an equipment failure on a compressor caused the slop tank to overflow. Approximately 18 bbls of crude oil were released. A vacuum truck was dispatched to the Site to recover free-standing fluids; approximately 18 bbls of crude oil were recovered. BTA reported the release to the NMOCD on a Form C-141 on February 22, 2019. The release was assigned RP Number 2RP-5383 and Incident Number NAB1906552791.

On February 9, 2019, the same equipment failure occurred on the compressor and caused the slop tank to overflow again. Approximately 18 bbls of crude oil were released. A vacuum truck was dispatched to the Site to recover free-standing fluids; approximately 18 bbls of crude oil were recovered. BTA reported

BTA Oil Producers, LLC  
Revised Remediation Work Plan  
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the release to the NMOCD on a Form C-141 on February 22, 2019. The release was assigned RP Number 2RP-5383 and Incident Number NAB1906551740.

## SITE CHARACTERIZATION AND CLOSURE CRITERIA

The Site was characterized to assess the applicability of Table I, Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29, Section 12 (19.15.29.12) of the New Mexico Administrative Code (NMAC). Results from the characterization desktop review are presented on the Form C-141, Site Assessment/Characterization. Potential Site receptors are identified on Figure 1.

Depth to groundwater at the Site is estimated to be greater than 55 feet below ground surface (bgs) based on the nearest groundwater well data. The closest permitted groundwater well with depth to groundwater data is New Mexico Office of the State Engineer (NMOSE) well C-04485, located approximately 0.5 miles southwest of the Site. The well was drilled to a depth of 55 feet during October 2020, and no groundwater was encountered. All wells used for depth to groundwater determination are depicted on Figure 1 and the referenced well records are included in Appendix A.

The closest continuously flowing or significant watercourse to the Site is a dry wash, located approximately 380 feet southwest of the Site. The Site is greater than 200 feet from a lakebed, sinkhole, or playa lake and greater than 300 feet from an occupied residence, school, hospital, institution, church, or wetland. The Site is greater than 1,000 feet to a freshwater well or spring and is not within a 100-year floodplain or overlying a subsurface mine. The Site is not underlain by unstable geology (medium potential karst designation area). Site receptors are identified on Figure 1.

Based on the results of the Site Characterization, the following NMOCD Table I Closure Criteria (Closure Criteria) apply:

- Benzene: 10 milligrams per kilogram (mg/kg)
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg
- Total petroleum hydrocarbons (TPH)-gasoline range organics (GRO) and TPH-diesel range organics (DRO): 1,000 mg/kg
- TPH: 2,500 mg/kg
- Chloride: 10,000 mg/kg

## BACKGROUND

Between November 2018 and August 2019, delineation and excavation activities were conducted at the Site to address the impacted soil resulting from the three slop tank overflow releases into an area of active production equipment. Impacted soil was excavated to a depth of 2 feet bgs around the active compressors and production equipment, and beneath the surface lines. A total of approximately 128 cubic yards of impacted soil were excavated. However, impacted soil was left in place immediately adjacent to and beneath the active compressors and production equipment where remediation would cause a major facility deconstruction. Impacted soil within the release extent was vertically delineated to below the most stringent Table I Closure Criteria. Delineation sample points SP1 and SP2 confirmed that impacted soil did not extend deeper than 4 feet bgs. The excavation extent and delineation soil sample locations are presented on the attached Figure 2. The laboratory analytical results are summarized in the attached Table 1. There was limited area to continue deeper excavation due to two compressors, two vertical separator vessels, hard-piped gas meter runs, high-pressure gas lines, and buried electrical lines within the release area. A *Work Plan* was submitted to NMOCD on September 25, 2019, proposing to defer the impacted soil left in place and install a 20 mil impermeable liner in the base

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of the 2-foot excavation prior to backfilling. Additional details can be referenced in the original *Work Plan*, submitted to NMOCD on September 25, 2019.

On December 11, 2019, NMOCD denied the *Work Plan* for Incident Numbers NCH1835547953, NAB1906552791, and NAB1906551740 for the following reasons:

- *The OCD can't approve this remediation plan because there aren't enough soil sample points in the spill area. Looking at the analytical table, SP1 and SP2 have the first clean sample points for TPH at 4' bgs and have only been excavated to 1' bgs. The areas that prevent further excavation because of the compressors, installed production equipment, lines, and rock refusal will need to be delineated with lab tested soil samples to quantify the amount of contaminated soil left in place. These samples will need to be included in a formal deferral request, once the rest of the excavation is delineated and excavated. The entire spill will not be deferred, please use a hydrovac to remove contaminated soil in places that can be excavated.*

## PROPOSED REMEDIATION WORKPLAN

Upon review of the September 25, 2019, *Work Plan*, it was noted that impacted soil was excavated to a depth of 2 feet bgs not 1-foot bgs as described in the denial language. Additionally, upon review of the 2018/2019 site photographs, it appears that impacted soil was excavated as close as possible to the active compressors and production equipment, including areas beneath surface lines. Additional excavation does not appear to be safely practical. A photographic log of the 2018/2019 excavation activities is provided in Appendix B along with photos from May 2023 showing the backfilled excavation area. BTA agrees that the delineation activities completed in 2019 were not adequate for deferral of the impacted soil left in place. As such, BTA requests approval to complete the following additional remediation activities:

- Full lateral and vertical delineation the impacted soil that was left in-place.
  - Boreholes will be advanced via hand auger outside of the historical release/excavation extent to determine the lateral extent of the impacted soil that was left in place and confirm the horizontal extent of the surface release.
  - Boreholes will be advanced via hand auger within the historical release/excavation extent to confirm removal of the top two feet of impacted soil, determine if a liner was installed prior to backfilling the excavation, and confirm the vertical extent of the impacted soil that was left in place.
  - Soil from the boreholes will be field screened at 1-foot intervals for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID) and chloride using Hach® chloride QuanTab® test strips. Field screening results and observations will be logged on lithologic/soil sampling logs. Two delineation samples from each borehole will be submitted for laboratory analysis; the sample with the highest field screening result and the sample from the final borehole depth.
    - Final depth of the boreholes will be determined by field screening results indicating compliance with the Site Closure Criteria. In the absence of elevated field screening results, the boreholes will be advanced to a depth of 4 feet bgs.
    - If a liner is encountered in the boreholes, the liner will be patched/repaired following vertical delineation activities.
  - The proposed borehole locations are shown on the attached Figure 3. Borehole locations may need to be adjusted slightly during field activities based on the location of underground utilities.

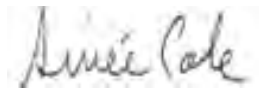
BTA Oil Producers, LLC  
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- The delineation samples will be analyzed for BTEX following United States Environmental Protection Agency (EPA) Method 8021B; TPH-GRO, TPH-DRO, and TPH-oil range organics (ORO) following EPA Method 8015M/D; and chloride following EPA Method 300.0.
- Upon completion of the lateral and vertical delineation activities and receipt of the laboratory analytical results, BTA will prepare a *Deferral Request* quantifying the volume of impacted soil left in place and requesting deferral until major well pad construction/alteration or final plugging and abandonment.

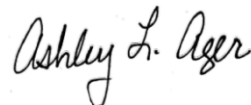
BTA will complete the delineation activities within 90 days of the date of approval of this *Revised Work Plan* by the NMOCD. BTA believes the scope of work described above meets the requirements set forth in 19.15.29.13 NMAC and is protective of human health, the environment, and groundwater. As such, BTA respectfully requests approval of this *Revised Work Plan* for Incident Numbers NCH1835547953, NAB1906552791, and NAB1906551740.

If you have any questions or comments, please contact Ms. Tacoma Morrissey at (337) 257-8307 or [tmorrissey@ensolum.com](mailto:tmorrissey@ensolum.com).

Sincerely,  
**Ensolum, LLC**



Aimee Cole  
Senior Managing Scientist



Ashley Ager, M.S., PG  
Principal

cc: Kelton Beaird, BTA  
Nathan Sirgo, BTA  
Bureau of Land Management

Appendices:

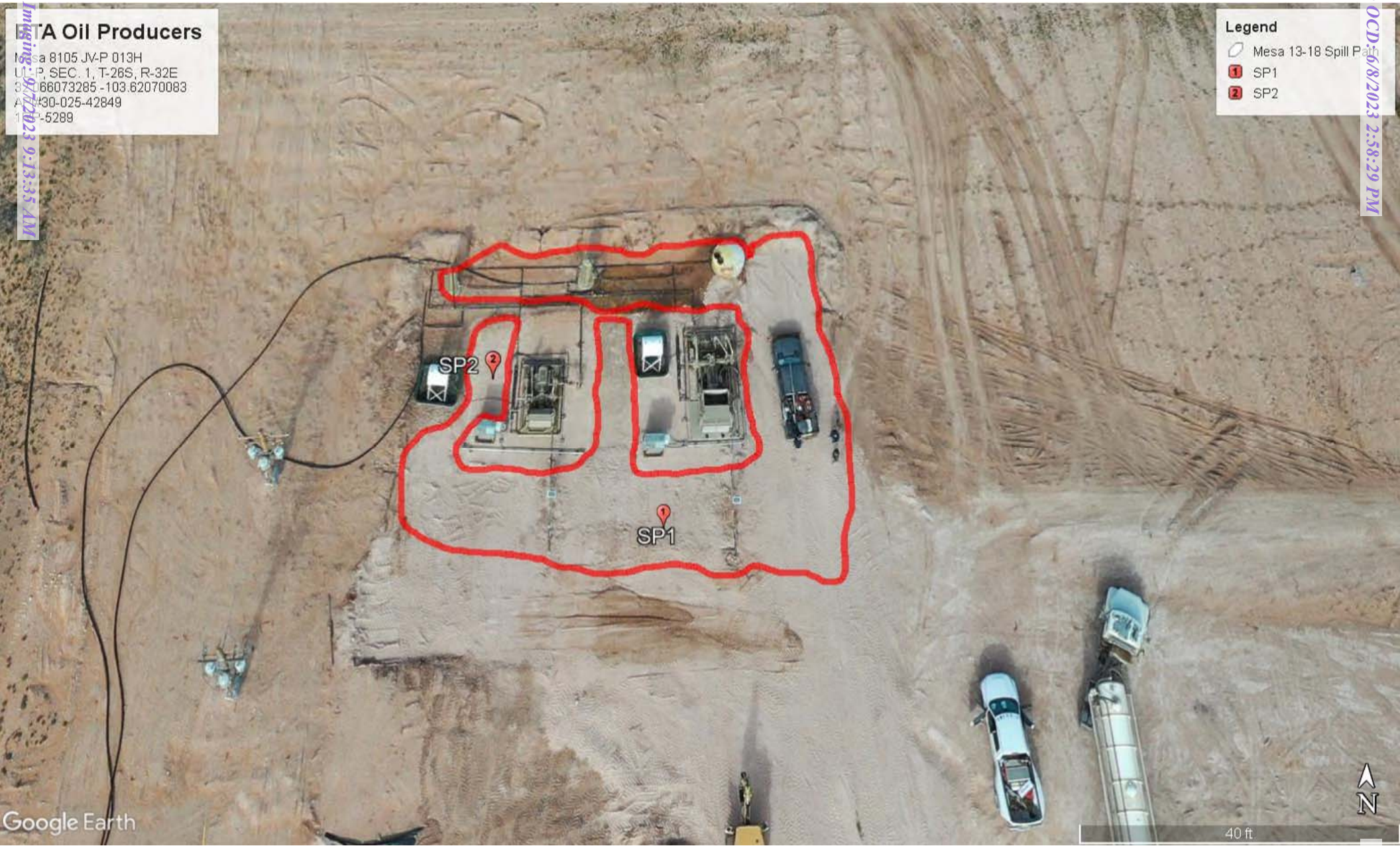
Figure 1	Site Location Map (2023)
Figure 2	Excavation Extent and Delineation Soil Sample Locations (2018/2019)
Figure 3	Proposed Delineation Soil Sample Locations (2023)
Table 1	Soil Sample Analytical Results (2018/2019)
Appendix A	Referenced Well Records
Appendix B	Photographic Log (2019/2023)
Appendix C	Laboratory Analytical Reports & Chain-of-Custody Documentation (2019)
Appendix D	Final C-141s



FIGURES

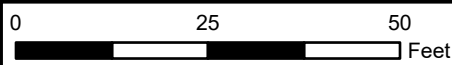
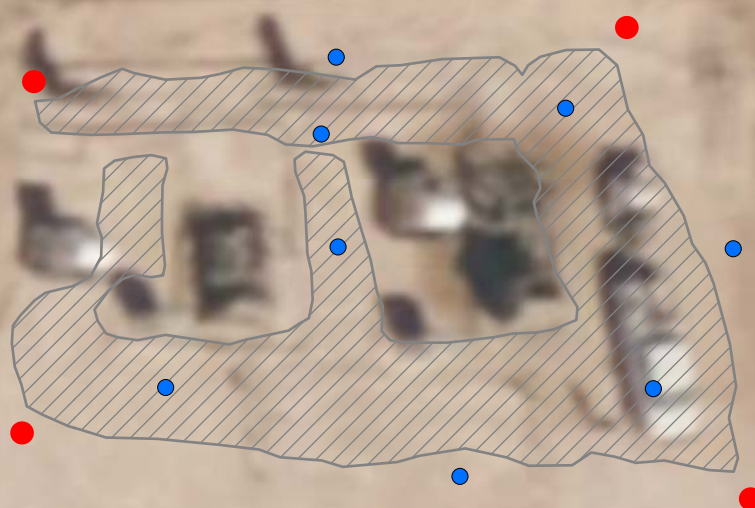
1

Figure 2 - Excavation Extent and Delineation Soil Sample Locations (2018/2019)



# Legend

- Proposed Borehole Locations
- Former Release/Excavation Extent



Sources: Environmental Systems Research Institute (ESRI)



## Proposed Delineation Soil Sample Locations

BTA Oil Producers, LLC  
 Mesa 8105 JV-P 013H  
 Incident Number: NCH1835547953, NAB1906552791, and NAB1906551740  
 Unit P, Section 1, Township 26 South, Range 32 East  
 Lea County, New Mexico

**FIGURE**  
**3**



TABLES

Mesa 13/18 Compressor Slop Tank Release - November 24, 2018; February 8, 2019; and February 9, 2019

OCD Tracking #: 1RP-5289 and 1RP-5383

Location	Status	Sample Date	Sample Depth (feet BGS)	Field Screening		Laboratory Results										
				PID Result (PPM)	Titration Result (mg/kg)	Chloride (mg/kg)	Total TPH (mg/kg)	TPH GRO + DRO (mg/kg)	BTEX (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Total Xylenes (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)	TPH Ext DRO (mg/kg)
SP1	Removed	11/25/18	Surface	15,000+	149											
SP1	Removed	11/25/18	1	9,800	105											
SP1	In Situ	11/25/18	2	12,300	98											
SP1	In Situ	8/23/19	2			48	22,422	16,532	16.9	0.424	5.36	1.71	9.36	232	16,300	5,890
SP1	In Situ	11/25/18	3	1,700	174											
SP1	In Situ	8/23/19	4	2.9	98	16	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
SP1	In Situ	8/23/19	7	0	98	32	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
SP2	Removed	11/25/18	Surface	15,000+	1,149											
SP2	Removed	11/25/18	1	8,547	549											
SP2	In Situ	11/25/18	2	8,500	174											
SP2	In Situ	8/23/19	2			16	10,623	7,743	3.47	ND	0.365	0.416	2.69	52.5	7,690	2,880
SP2	In Situ	11/25/18	3	100	98											
SP2	In Situ	8/23/19	4	1.8	105	ND	10.1	ND	ND	ND	ND	ND	ND	ND	ND	10.1
SP2	In Situ	8/23/19	5	0	98	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

**NMOCD Table 1 - Closure Criteria for Soils Impacted by a Release (19.15.29.12)****Minimum Depth to GW less than 10,000 mg/l TDS**

<= 50'	600	100	-	50	10
51' - 100'	10,000	2,500	1,000	50	10
>100'	20,000	2,500	1,000	50	10

**Reporting Limits:**

Chloride: 16.0 mg/kg

Benzene, Toluene, Ethylbenzene: 0.050 mg/kg for each analyte

Total Xylenes: 0.150 mg/kg

Total BTEX: 0.300 mg/kg

GRO (C6 - C10), DRO (&gt;C10 - C28), Ext DRO (&gt;C28 - C36): 10.0 mg/kg for each analyte



## APPENDIX A

### Referenced Well Records

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# WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

www.ose.state.nm.us

1. GENERAL AND WELL LOCATION

OSE POD NO. (WELL NO.) <b>C-04485</b>		OWL 362	WELL TAG ID NO. NA	OSE FILE NO(S). <b>C-04485</b>
WELL OWNER NAME(S) <b>KJ ENVIRONMENTAL</b>			PHONE (OPTIONAL) 214-287-5875	
WELL OWNER MAILING ADDRESS <b>500 MOSSELEY ROAD</b>			CITY <b>CROSS ROADS</b>	STATE <b>TX</b> ZIP <b>76227</b>
WELL LOCATION (FROM GPS)	DEGREES	MINUTES	SECONDS	* ACCURACY REQUIRED: ONE TENTH OF A SECOND * DATUM REQUIRED: WGS 84
	LATITUDE	3548560	N	
	LONGITUDE	629271	W	
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS - PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE				

2. DRILLING & CASING INFORMATION

LICENSE NO. <b>WD 1186</b>	NAME OF LICENSED DRILLER <b>RODNEY HAMMER</b>		NAME OF WELL DRILLING COMPANY <b>ENVIRO-DRILL, INC.</b>				
DRILLING STARTED <b>10/05/2020</b>	DRILLING ENDED <b>10/06/2020</b>	DEPTH OF COMPLETED WELL (FT) <b>55'</b>	BORE HOLE DEPTH (FT) <b>55'</b>	DEPTH WATER FIRST ENCOUNTERED (FT) <b>None (Dry)</b>			
COMPLETED WELL IS: <input type="checkbox"/> ARTESIAN <input checked="" type="checkbox"/> DRY HOLE <input type="checkbox"/> SHALLOW (UNCONFINED)				STATIC WATER LEVEL IN COMPLETED WELL (FT)			
DRILLING FLUID: <input type="checkbox"/> AIR <input type="checkbox"/> MUD ADDITIVES - SPECIFY:							
DRILLING METHOD: <input checked="" type="checkbox"/> ROTARY <input type="checkbox"/> HAMMER <input type="checkbox"/> CABLE TOOL <input checked="" type="checkbox"/> OTHER - SPECIFY: <b>HSA</b>							
DEPTH (feet bgl)		BORE HOLE DIAM (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)	CASING CONNECTION TYPE (add coupling diameter)	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)	SLOT SIZE (inches)
FROM	TO						
<b>55</b>	<b>45</b>	<b>8"</b>	<b>Screen</b>	<b>FJT</b>	<b>2"</b>	<b>2"</b>	<b>.010</b>
<b>45</b>	<b>0</b>	<b>8"</b>	<b>Blank</b>	<b>11</b>	<b>11</b>	<b>11</b>	

3. ANNULAR MATERIAL

DEPTH (feet bgl)		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL	AMOUNT (cubic feet)	METHOD OF PLACEMENT
FROM	TO				
<b>55</b>	<b>43</b>	<b>8"</b>	<b>Sand 10/20</b>	<b>10</b>	<b>tremie</b>
<b>43</b>	<b>41</b>	<b>8"</b>	<b>Hole Plug</b>	<b>1</b>	
<b>41</b>	<b>0</b>	<b>8"</b>	<b>Grout</b>	<b>100 gal.</b>	<b>↓</b>

FOR OSE INTERNAL USE

FILE NO. <b>C-0-2599</b>	WR-20 WELL RECORD & LOG (Version 06/30/17)
LOCATION <b>2-2-4</b>	POD NO. <b>2N-33E-10</b>
WELL TAG ID NO. <b>693367</b>	PAGE 1 OF 2

68344-ENGINEER OFFICE

Released to Imaging: 9/7/2023 9:13:35 AM



## APPENDIX B

### Photographic Log

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2019 - Photo Log



Facing North



Spill Excavated



Digging up release



Spill Excavated



Spill excavated



Aerial View -South View

2019 - Photo Log



Facing west



Facing North



Facing South



Facing Northwest



2019 - Photo Log



Northeast



North



Facing West



South



Facing East



Spill Area Facing South



**Photographic Log**  
BTA Oil Producers, LLC  
Mesa 8105 JV-P 013H

Date & Time: Tue, May 30, 2023 at 12:04:57 MDT  
Position: +032.066180° / -103.624564° (±15.7ft)  
Altitude: 3323ft (±10.8ft)  
Datum: WGS-84  
Azimuth/Bearing: 010° N10E 0178mils True (±11°)  
Elevation Angle: -02.4°  
Horizon Angle: +00.6°  
Zoom: 0.5X  
Facing north  
Mariana O'Dell



Photograph: 1 Date: 5/30/2023  
Description: Historical release area/backfilled excavation  
View: North

Date & Time: Tue, May 30, 2023 at 12:05:31 MDT  
Position: +032.066279° / -103.624314° (±15.6ft)  
Altitude: 3324ft (±11.0ft)  
Datum: WGS-84  
Azimuth/Bearing: 285° N75W 5067mils True (±12°)  
Elevation Angle: -03.4°  
Horizon Angle: +00.1°  
Zoom: 0.5X  
Facing west backfill  
Mariana O'Dell



Photograph: 2 Date: 5/30/2023  
Description: Historical release area/backfilled excavation  
View: West

Date & Time: Tue, May 30, 2023 at 12:06:36 MDT  
Position: +032.066369° / -103.624673° (±15.5ft)  
Altitude: 3324ft (±11.1ft)  
Datum: WGS-84  
Azimuth/Bearing: 096° S84E 1797mils True (±12°)  
Elevation Angle: -04.2°  
Horizon Angle: +00.9°  
Zoom: 0.5X  
Facing east backfill  
Mariana O'Dell



Photograph: 3 Date: 5/30/2023  
Description: Historical release area/backfilled excavation  
View: East

Date & Time: Tue, May 30, 2023 at 12:09:17 MDT  
Position: +032.066454° / -103.624436° (±15.6ft)  
Altitude: 3320ft (±11.0ft)  
Datum: WGS-84  
Azimuth/Bearing: 201° S21W 3573mils True (±12°)  
Elevation Angle: -02.6°  
Horizon Angle: +00.0°  
Zoom: 0.5X  
Facing south backfill  
Mariana O'Dell



Photograph: 4 Date: 5/30/2023  
Description: Historical release area/backfilled excavation  
View: South



## APPENDIX C

### Laboratory Analytical Reports & Chain of Custody Documentation

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

August 27, 2019

BOB HALL

BTA Oil Producers

103 South Pecos

Midland, TX 79701

RE: MESA 13 - 18

Enclosed are the results of analyses for samples received by the laboratory on 08/26/19 15:15.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-18-11. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/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



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

**Analytical Results For:**

BTA Oil Producers  
BOB HALL  
103 South Pecos  
Midland TX, 79701  
Fax To: (432) 683-0312

Received: 08/26/2019  
Reported: 08/27/2019  
Project Name: MESA 13 - 18  
Project Number: COMPRESSOR 3 SPILLS  
Project Location: LEA CO

Sampling Date: 08/23/2019  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Tamara Oldaker

**Sample ID: SP 1 @ 2' (H902935-01)**

BTX 8021B		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Benzene*</b>	<b>0.424</b>	0.050	08/27/2019	ND	1.69	84.7	2.00	0.243	
<b>Toluene*</b>	<b>5.36</b>	0.050	08/27/2019	ND	1.90	94.9	2.00	0.313	
<b>Ethylbenzene*</b>	<b>1.71</b>	0.050	08/27/2019	ND	2.03	101	2.00	1.70	
<b>Total Xylenes*</b>	<b>9.36</b>	0.150	08/27/2019	ND	6.22	104	6.00	2.17	
<b>Total BTX</b>	<b>16.9</b>	0.300	08/27/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 111 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>48.0</b>	16.0	08/27/2019	ND	432	108	400	0.00	

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>232</b>	50.0	08/27/2019	ND	207	103	200	2.02		
<b>DRO &gt;C10-C28*</b>	<b>16300</b>	50.0	08/27/2019	ND	203	101	200	2.56		
<b>EXT DRO &gt;C28-C36</b>	<b>5890</b>	50.0	08/27/2019	ND						

Surrogate: 1-Chlorooctane 127 % 41-142

Surrogate: 1-Chlorooctadecane 916 % 37.6-147

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

BTA Oil Producers  
BOB HALL  
103 South Pecos  
Midland TX, 79701  
Fax To: (432) 683-0312

Received: 08/26/2019  
Reported: 08/27/2019  
Project Name: MESA 13 - 18  
Project Number: COMPRESSOR 3 SPILLS  
Project Location: LEA CO

Sampling Date: 08/23/2019  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Tamara Oldaker

**Sample ID: SP 1 @ 4' (H902935-02)**

BTX 8021B		mg/kg		Analyzed By: ms						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/27/2019	ND	1.69	84.7	2.00	0.243		
Toluene*	<0.050	0.050	08/27/2019	ND	1.90	94.9	2.00	0.313		
Ethylbenzene*	<0.050	0.050	08/27/2019	ND	2.03	101	2.00	1.70		
Total Xylenes*	<0.150	0.150	08/27/2019	ND	6.22	104	6.00	2.17		
Total BTX	<0.300	0.300	08/27/2019	ND						

Surrogate: 4-Bromofluorobenzene (PID) 91.0 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	08/27/2019	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/27/2019	ND	207	103	200	2.02	
DRO >C10-C28*	<10.0	10.0	08/27/2019	ND	203	101	200	2.56	
EXT DRO >C28-C36	<10.0	10.0	08/27/2019	ND					

Surrogate: 1-Chlorooctane 113 % 41-142

Surrogate: 1-Chlorooctadecane 123 % 37.6-147

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

BTA Oil Producers  
BOB HALL  
103 South Pecos  
Midland TX, 79701  
Fax To: (432) 683-0312

Received: 08/26/2019  
Reported: 08/27/2019  
Project Name: MESA 13 - 18  
Project Number: COMPRESSOR 3 SPILLS  
Project Location: LEA CO

Sampling Date: 08/23/2019  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Tamara Oldaker

**Sample ID: SP 1 @ 7' (H902935-03)**

BTEX 8021B		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/27/2019	ND	1.69	84.7	2.00	0.243	
Toluene*	<0.050	0.050	08/27/2019	ND	1.90	94.9	2.00	0.313	
Ethylbenzene*	<0.050	0.050	08/27/2019	ND	2.03	101	2.00	1.70	
Total Xylenes*	<0.150	0.150	08/27/2019	ND	6.22	104	6.00	2.17	
Total BTEX	<0.300	0.300	08/27/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 93.1 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	08/27/2019	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/27/2019	ND	207	103	200	2.02	
DRO >C10-C28*	<10.0	10.0	08/27/2019	ND	203	101	200	2.56	
EXT DRO >C28-C36	<10.0	10.0	08/27/2019	ND					

Surrogate: 1-Chlorooctane 125 % 41-142

Surrogate: 1-Chlorooctadecane 135 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

BTA Oil Producers  
BOB HALL  
103 South Pecos  
Midland TX, 79701  
Fax To: (432) 683-0312

Received: 08/26/2019  
Reported: 08/27/2019  
Project Name: MESA 13 - 18  
Project Number: COMPRESSOR 3 SPILLS  
Project Location: LEA CO

Sampling Date: 08/23/2019  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Tamara Oldaker

**Sample ID: SP 2 @ 2' (H902935-04)**

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/26/2019	ND	1.69	84.3	2.00	0.552	
Toluene*	0.365	0.050	08/26/2019	ND	1.88	94.0	2.00	1.51	
Ethylbenzene*	0.416	0.050	08/26/2019	ND	1.96	97.9	2.00	1.18	
Total Xylenes*	2.69	0.150	08/26/2019	ND	6.08	101	6.00	1.15	
Total BTX	3.47	0.300	08/26/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 126 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	08/27/2019	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS				S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	52.5	10.0	08/27/2019	ND	207	103	200	2.02	
DRO >C10-C28*	7690	10.0	08/27/2019	ND	203	101	200	2.56	
EXT DRO >C28-C36	2880	10.0	08/27/2019	ND					

Surrogate: 1-Chlorooctane 115 % 41-142

Surrogate: 1-Chlorooctadecane 497 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

BTA Oil Producers  
BOB HALL  
103 South Pecos  
Midland TX, 79701  
Fax To: (432) 683-0312

Received: 08/26/2019  
Reported: 08/27/2019  
Project Name: MESA 13 - 18  
Project Number: COMPRESSOR 3 SPILLS  
Project Location: LEA CO

Sampling Date: 08/23/2019  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Tamara Oldaker

**Sample ID: SP 2 @ 4' (H902935-05)**

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/26/2019	ND	1.69	84.3	2.00	0.552	
Toluene*	<0.050	0.050	08/26/2019	ND	1.88	94.0	2.00	1.51	
Ethylbenzene*	<0.050	0.050	08/26/2019	ND	1.96	97.9	2.00	1.18	
Total Xylenes*	<0.150	0.150	08/26/2019	ND	6.08	101	6.00	1.15	
Total BTX	<0.300	0.300	08/26/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 105 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	08/27/2019	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/27/2019	ND	207	103	200	2.02	
DRO >C10-C28*	<10.0	10.0	08/27/2019	ND	203	101	200	2.56	
EXT DRO >C28-C36	10.1	10.0	08/27/2019	ND					

Surrogate: 1-Chlorooctane 115 % 41-142

Surrogate: 1-Chlorooctadecane 126 % 37.6-147

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

BTA Oil Producers  
BOB HALL  
103 South Pecos  
Midland TX, 79701  
Fax To: (432) 683-0312

Received: 08/26/2019  
Reported: 08/27/2019  
Project Name: MESA 13 - 18  
Project Number: COMPRESSOR 3 SPILLS  
Project Location: LEA CO

Sampling Date: 08/23/2019  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Tamara Oldaker

**Sample ID: SP 2 @ 5' (H902935-06)**

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/26/2019	ND	1.69	84.3	2.00	0.552	
Toluene*	<0.050	0.050	08/26/2019	ND	1.88	94.0	2.00	1.51	
Ethylbenzene*	<0.050	0.050	08/26/2019	ND	1.96	97.9	2.00	1.18	
Total Xylenes*	<0.150	0.150	08/26/2019	ND	6.08	101	6.00	1.15	
Total BTX	<0.300	0.300	08/26/2019	ND					

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	08/27/2019	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/27/2019	ND	207	103	200	2.02	
DRO >C10-C28*	<10.0	10.0	08/27/2019	ND	203	101	200	2.56	
EXT DRO >C28-C36	<10.0	10.0	08/27/2019	ND					

Surrogate: 1-Chlorooctane 114 % 41-142

Surrogate: 1-Chlorooctadecane 124 % 37.6-147

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### 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.
S-04	The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
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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A handwritten signature in black ink, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager



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Laboratories

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240  
(575) 393-2326 FAX (575) 393-2476

[illegible]

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Relinquished By: [Signature] Date: 8-26-19 Received By: [Signature] Phone Result: ☐ Yes ☐ No Add'l Phone #:             
 Time: 15:15 Fax Result: ☐ Yes ☐ No Add'l Fax #:             
 Relinquished By:            Date:            Received By:            REMARKS: "Rush"  
 Time:           

Delivered By: (Circle One) 4.42 #97 Sample Condition: ☒ Cool ☐ Intact CHECKED BY: Michael  
 (Initials)  
 Sampler - UPS - Bus - Other: Corrected 4.72 TO

† Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326



APPENDIX D

Final C-141s

---

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	NCH1835547953
District RP	1RP-5289
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party BTA Oil Producers	OGRID 260297
Contact Name Ben Grimes	Contact Telephone (432) 682-3753
Contact email bgrimes@btaoil.com	Incident # (assigned by OCD)
Contact mailing address 104 S Pecos St, Midland, TX 79701	

### Location of Release Source

Latitude 32.0660734285 Longitude 103.624070083  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Mesa 8105 JV-P 013H (compressor)	Site Type well pad
Date Release Discovered 11/24/2018	API# (if applicable) 30-025-42849

Unit Letter	Section	Township	Range	County
P	1	26S	32E	Lea

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 type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 20	Volume Recovered (bbls) 5
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input checked="" type="checkbox"/> Condensate	Volume Released (bbls) 10	Volume Recovered (bbls) 5
<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

Malfunction on compressor caused slop tank to overflow.

Form C-141

Page 2

State of New Mexico  
Oil Conservation Division

Incident ID	NCH1835547953
District RP	1RP-5289
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?  Yes 19.15.29.7 (A) defines 25 BBL or more a major release
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?  No	

**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:  	
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.	
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: <u>Ben Grimes</u>	Title: <u>Production Manager</u>
Signature: <u>Ben Grimes</u>	Date: <u>11/26/2018</u>
email: <u>BGrimes@PTAOIL.com</u>	Telephone: <u>432-682-3753</u>
<b><u>OCD Only</u></b>	
Received by: _____	Date: _____

Incident ID	NCH835547953
District RP	1RP-5289
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>&gt;55</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 <b>not</b> on an exploration, development, production, or storage site?	<input checked="" type="checkbox"/> Yes <input 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

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.

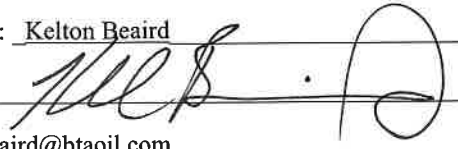
Form C-141

State of New Mexico  
Oil Conservation Division

Page 4

Incident ID	NCH835547953
District RP	1RP-5289
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: Kelton BeairdTitle: Environmental ManagerSignature: Date: 6-6-23email: kbeaird@btaoil.comTelephone: 432-312-2203**OCD Only**

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

Date: \_\_\_\_\_

Form C-141

Page 5

State of New Mexico  
Oil Conservation Division

Incident ID	NCH835547953
District RP	1RP-5289
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)

**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: Kelton BeairdTitle: Environmental ManagerSignature: Date: 6-6-23email: kbeaird@btaoil.comTelephone: 432-312-2203**OCD Only**

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

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

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

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	NAB1906552791
District RP	1RP-5383
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party: BTA Oil Producers, LLC	OGRID: 260297
Contact Name: Bob Hall	Contact Telephone: 432-682-3753
Contact email: bhall@btaoil.com	Incident # (assigned by OCD) NAB1906552791
Contact mailing address: 104 S. Pecos St., Midland, TX 79701	

### Location of Release Source

Latitude: 32.06584° Longitude: -103.62410°

(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Mesa 8105 JV-P 13/18 Compressor	Site Type: Well Pad
Date Release Discovered: 2/8/2019	API# (if applicable) Nearest well: Mesa 8195 JV-P #013H API #30-025-42849

Unit Letter	Section	Township	Range	County
P	1	26S	32E	Lea

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

### 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) 18 BBL	Volume Recovered (bbls) 18 BBL
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	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

Due to an equipment failure on the compressor, oil was pushed over to the slop tank, which overflowed. The oil was recovered with a vacuum truck.



State of New Mexico  
Oil Conservation Division

Incident ID	NAB1906552791
District RP	1RP-5383
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)?	

**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:	
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.	
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: <b>Bob Hall</b> Title: <b>Environmental Manager</b>	
Signature: 	Date: <b>2/22/2018</b>
email: <b>bhall@btaoil.com</b>	Telephone: <b>432-682-3753</b>
<b>OCD Only</b>	
Received by: 	Date: <b>3/06/2019</b>

Incident ID	NAB1906552791
District RP	1RP-5383
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>&gt;55</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 <b>not</b> on an exploration, development, production, or storage site?	<input checked="" type="checkbox"/> Yes <input 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

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.

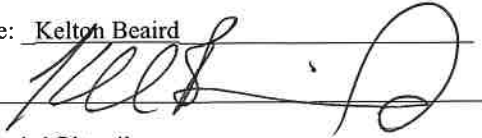
Form C-141

State of New Mexico  
Oil Conservation Division

Page 4

Incident ID	NAB1906552791
District RP	1RP-5383
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: Kelton BeairdTitle: Environmental ManagerSignature: Date: 6-6-23email: kbeaird@btaoil.comTelephone: 432-312-2203**OCD Only**

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

Date: \_\_\_\_\_

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Page 5

State of New Mexico  
Oil Conservation Division

Incident ID	NAB1906552791
District RP	1RP-5383
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)

**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: Kelton BeairdTitle: Environmental ManagerSignature: Date: 6-6-23email: kbeaird@btaoil.comTelephone: 432-312-2203**OCD Only**

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

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

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

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	NAB1906551740
District RP	1RP-5383
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party: BTA Oil Producers, LLC	OGRID: 260297
Contact Name: Bob Hall	Contact Telephone: 432-682-3753
Contact email: bhall@btaoil.com	Incident # (assigned by OCD) NAB1906551740
Contact mailing address: 104 S. Pecos St., Midland, TX 79701	

### Location of Release Source

Latitude: 32.06584° Longitude: -103.62410°

(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Mesa 8105 JV-P 13/18 Compressor	Site Type: Well Pad
Date Release Discovered: 2/9/2019	API# (if applicable) Nearest well: Mesa 8195 JV-P #013H API #30-025-42849

Unit Letter	Section	Township	Range	County
P	1	26S	32E	Lea

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

### 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) 18 BBL	Volume Recovered (bbls) 18 BBL
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	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

The same equipment failure on the compressor, as occurred as a separate event and reported for 2/8/2019, pushed oil over to the slop tank and caused the tank to overflow. The oil was recovered with a vacuum truck.



State of New Mexico  
Oil Conservation Division

Incident ID	NAB1906551740
District RP	1RP-5383
Facility ID	
Application ID	pAB1906551401

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)?          	

**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:          	
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.	
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: <b>Bob Hall</b> Title: <b>Environmental Manager</b>	
Signature: 	Date: <b>2/22/2018</b>
email: <b>bhall@btaoil.com</b>	Telephone: <b>432-682-3753</b>
<b>OCD Only</b>	
Received by: 	Date: <b>3/6/2019</b>

Incident ID	NAB1906551740
District RP	1RP-5383
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>&gt;55</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 <b>not</b> on an exploration, development, production, or storage site?	<input checked="" type="checkbox"/> Yes <input 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

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.

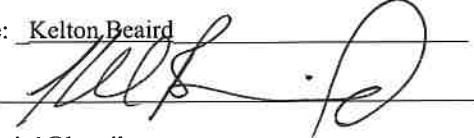
Form C-141

Page 4

State of New Mexico  
Oil Conservation Division

Incident ID	NAB1906551740
District RP	1RP-5383
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: Kelton BeairdTitle: Environmental ManagerSignature: Date: 6-6-23email: kbeaird@btaoil.comTelephone: 432-312-2203**OCD Only**Received by: Jocelyn HarimonDate: 06/08/2023

Form C-141

Page 5

State of New Mexico  
Oil Conservation Division

Incident ID	NAB1906551740
District RP	1RP-5383
Facility ID	
Application ID	

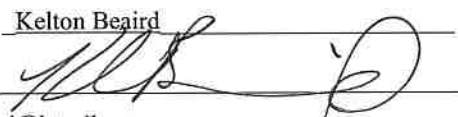
**Remediation Plan****Remediation Plan Checklist:** *Each of the following items must be included in the plan.*

- ☒ 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)

**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: Kelton BeairdTitle: Environmental ManagerSignature: Date: 6-6-23email: kbeaird@btaoil.comTelephone: 432-312-2203**OCD Only**Received by: Jocelyn Harimon Date: 06/08/2023

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved  
 see text box below - NV

Signature: Nelson Velez Date: 09/07/2023**Remediation plan is approved with the following conditions;**

1. Must include four (4) quadrant delineation points to the investigation as depicted within Figure 3 (solid red circles). Borings should be as close to the tentative impact perimeter as possible.
2. Must give 2 business day notification per 19.15.29.12D (1a) NMAC if using the delineation points toward final sampling.
3. BTA has 90-days (December 6, 2023) to submit its findings in the appropriate report documentation.

**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 225632

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 225632
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
nvelez	Remediation plan is approved with the following conditions; 1. Must include four (4) quadrant delineation points to the investigation as depicted within Figure 3 (solid red circles). Borings should be as close to the tentative impact perimeter as possible. 2. Must give 2 business day notification per 19.15.29.12D (1a) NMAC if using the delineation points toward final sampling. 3. BTA has 90-days (December 6, 2023) to submit its findings in the appropriate report documentation.	9/7/2023