



August 2, 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: Closure Request
Rojo 10-13 34-37 Tank Battery
Incident Number nAPP2129826922
Lea County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of BTA Oil Producers, LLC (BTA), has prepared this *Closure Request* to document assessment and soil sampling activities performed at the Rojo 10-13 34-37 Tank Battery (Site). The purpose of the Site assessment and soil sampling activities was to assess for the presence or absence of impacts to soil following a release of produced water within a lined containment at the Site. Based on field observations, field screening activities, and soil sample laboratory analytical results, BTA is submitting this *Closure Request*, describing Site assessment and delineation activities that have occurred and requesting no further action and closure for Incident Number nAPP2129826922.

SITE DESCRIPTION AND RELEASE SUMMARY

The Site is located in Unit A, Section 27, Township 25 South, Range 33 East, in Lea County, New Mexico (32.10836°, -103.55317°) and is associated with oil and gas exploration and production operations on private land owned by CAML Limited.

On October 24, 2021, a float failed to activate a high-level alarm to turn on a pump causing a tank to overflow, resulting in the release of approximately 40 barrels (bbls) of produced water into the lined tank battery containment. A vacuum truck was dispatched to the Site to recover free-standing fluids; approximately all 40 bbls of produced water were recovered from the containment. BTA reported the release to the New Mexico Oil Conservation Division (NMOCD) and submitted a *Release Notification Form C-141* (Form C-141) on October 25, 2021. The release was assigned Incident Number nAPP2129826922.

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 (19.15.29) of the New Mexico Administrative Code (NMAC). Results from the characterization desktop review are presented on page 3 of 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 between 51 feet and 100 feet below ground surface (bgs) based on the nearest groundwater well data. The closest permitted groundwater well with depth to groundwater data is a soil boring permitted by the New Mexico Office of the State Engineer (NMOSE) as file number C-04698-POD1, located approximately 1/2 mile west of the Site. The soil boring was installed on January 3, 2023, to determine depth to water beneath the Site. The boring was drilled to a

BTA Oil Producers, LLC
Closure Request
Rojo 10-13 34-37 Tank Battery

maximum depth of 60 feet bgs and was allowed to sit for at least three days to allow potentially slow infill of groundwater to enter the boring. Following the 72-hour waiting period, it was determined groundwater was not present and depth to water beneath the Site is greater than 60 feet bgs. The soil boring was subsequently plugged following approved NMOSE methods. All wells used for depth to water 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 an emergent wetland, located approximately 4,028 feet south 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 (low 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 diesel range organics (DRO): 1,000 mg/kg
- TPH: 2,500 mg/kg
- Chloride: 10,000 mg/kg

SITE ASSESSMENT ACTIVITIES

A 48-hour advance notice of the liner inspection was provided via email on June 14, 2023, to the NMOCD. A liner integrity inspection was conducted by Ensolum personnel on June 19, 2023. Upon inspection, no rips, tears, holes, or damage was observed. The liner was determined to be sufficient, and all released fluids have been removed.

Four discrete delineation soil samples, SS01 through SS04, were collected at a depth of 0.5 feet bgs to confirm the lateral release extent did not extend outside or breach the containment. Delineation soil samples were field screened for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID) and chloride using Hach® chloride QuanTab® test strips. The delineation soil sample locations are depicted on Figure 2. Photographic documentation was conducted at the Site. A photographic log is included in Appendix B.

The soil samples were placed directly into pre-cleaned glass jars, labeled with the location, date, time, sampler name, method of analysis, and immediately placed on ice. The soil samples were transported under strict chain-of-custody procedures to Cardinal Laboratories (Cardinal) in Hobbs, New Mexico, for analysis of the following chemicals of concern (COCs): BTEX following United States Environmental Protection Agency (EPA) Method 8021B; TPH- GRO, TPH- RO, and TPH-oil range organics (ORO) following EPA Method 8015M/D; and chloride following Standard Method SM4500.

LABORATORY ANALYTICAL RESULTS

Laboratory analytical results for delineation soil samples SS01 through SS04 indicated all COC concentrations were compliant with the most stringent Table I Closure Criteria and successfully defined the lateral extent of the release. Laboratory analytical results are summarized in Table 1 and the complete laboratory analytical reports are included as Appendix C.

BTA Oil Producers, LLC
Closure Request
Rojo 10-13 34-37 Tank Battery

CLOSURE REQUEST

Site assessment and delineation activities were conducted at the Site to assess for the presence or absence of impacts to soil resulting from the historical October 2021 produced water release within the lined containment. A liner integrity inspection was conducted by Ensolum personnel on June 19, 2023. Upon inspection, no rips, tears, holes, or damage was observed, and the liner was determined to be sufficient. Laboratory analytical results for the delineation soil samples, collected around the lined containment, indicated all COC concentrations were compliant with the most stringent Table I Closure Criteria. The release was contained laterally by the lined containment and the liner was performing as designed.

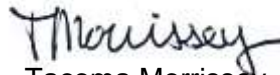
Based on initial response efforts, the liner operating as designed, and soil sample laboratory analytical results confirming the absence of impacted soil outside containment, BTA respectfully requests closure for Incident Number nAPP2129826922. Notifications submitted to the NMOCD are included in Appendix D and the final Form C-141 is included in Appendix E.

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

Sincerely,
Ensolum, LLC



Hadlie Green
Project Geologist



Tacoma Morrissey
Senior Geologist

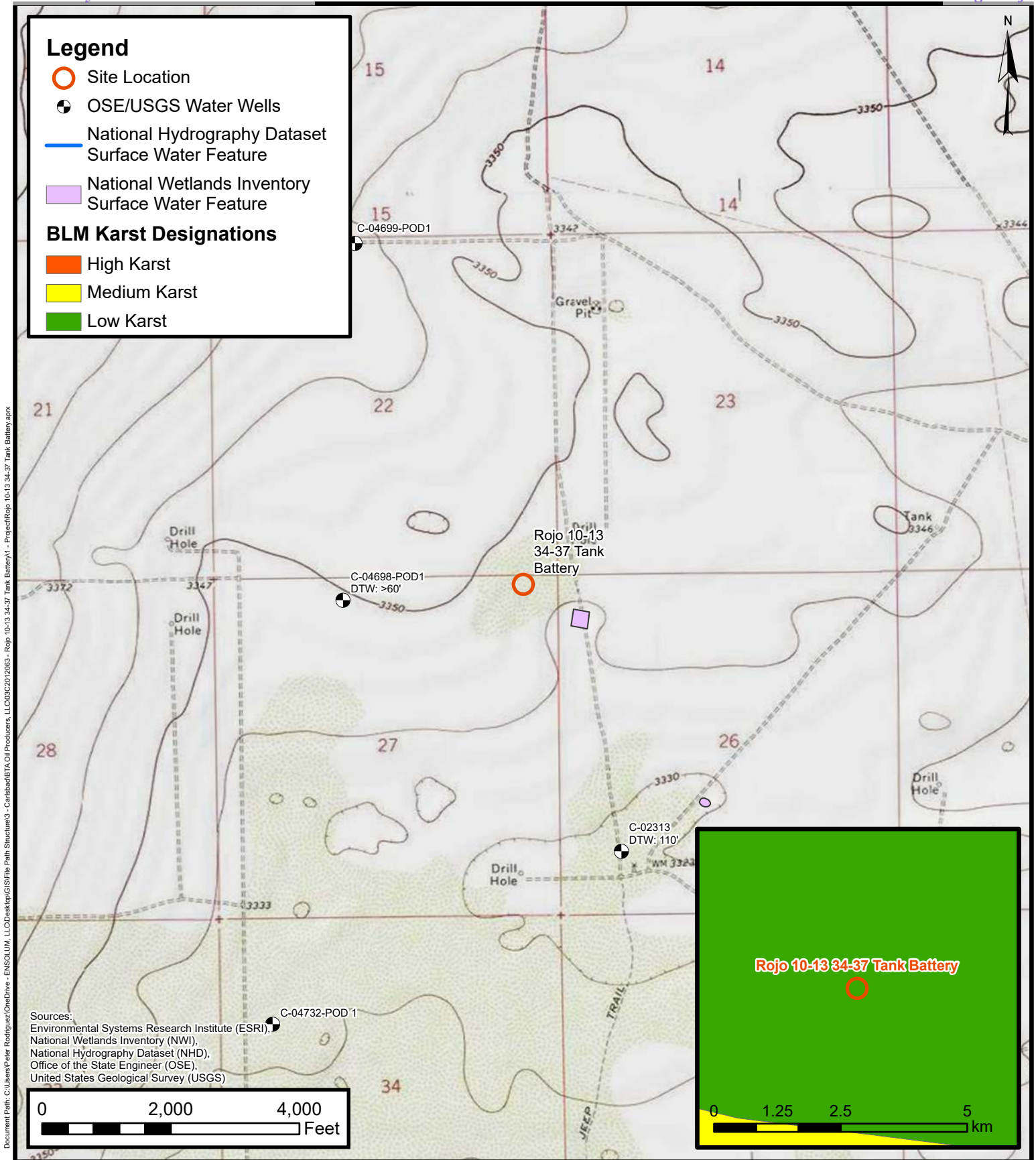
cc: Kelton Beaird, BTA
Nathan Sirgo, BTA
CAML Limited

Appendices:

Figure 1	Site Receptor Map
Figure 2	Delineation Soil Sample Locations
Table 1	Soil Sample Analytical Results
Appendix A	Referenced Well Records
Appendix B	Photographic Log
Appendix C	Laboratory Analytical Reports & Chain-of-Custody Documentation
Appendix D	NMOCD Notifications
Appendix E	Final C-141



FIGURES



Site Receptor Map

BTA Oil Producers
 Rojo 10-13 34-37 Tank Battery
 Incident Number: NAPP2129826922
 Unit A, Section 27, T25S, R33E
 Lea County, New Mexico

FIGURE

1





Delineation Soil Sample Locations

BTA Oil Producers
Rojo 10-13 34-37 Tank Battery
Incident Number: NAPP2129826922
Unit A, Section 27, T25S, R33E
Lea County, New Mexico

FIGURE
2



TABLES



TABLE 1
SOIL SAMPLE ANALYTICAL RESULTS
Rojo 10-13 34-37 Tank Battery
BTA Oil Producers, LLC
Lea County, New Mexico

Sample I.D.	Sample Date	Sample Depth (feet bgs)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)	TPH ORO (mg/kg)	GRO+DRO (mg/kg)	Total TPH (mg/kg)	Chloride (mg/kg)
NMOCD Table I Closure Criteria (NMAC 19.15.29)			10	50	NE	NE	NE	1,000	2,500	10,000
Delineation Soil Samples										
SS01	06/16/2023	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	<16.0
SS02	06/16/2023	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	<16.0
SS03	06/16/2023	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	<16.0
SS04	06/16/2023	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	16.0

Notes:


bgs: below ground surface
mg/kg: milligrams per kilogram
NMOCD: New Mexico Oil Conservation Division
NMAC: New Mexico Administrative Code
BTEX: Benzene, Toluene, Ethylbenzene, and Xylenes
Concentrations in **bold** exceed the NMOCD Table I Closure Criteria or reclamation standard where applicable.

GRO: Gasoline Range Organics
DRO: Diesel Range Organics
ORO: Oil Range Organics
TPH: Total Petroleum Hydrocarbon



APPENDIX A

Referenced Well Records

								Sample Name: BH01		Date: 1/3/2023	
								Site Name: Rojo 26 Oil Dump Valve Failure			
								Incident Number: nAPP2224256412			
								Job Number: 03C2012006			
LITHOLOGIC / SOIL SAMPLING LOG								Logged By: CS / MR		Method: Air Rotary	
Coordinates: 32.107784, -103.562235								Hole Diameter: 6"		Total Depth: 60'	
Comments: Soil boring was advanced to a total depth of 60' bgs. No water was observed within the soil boring after at least 72 hours. On 1/16/2023 the soil boring was plugged and abandoned using hydrated bentonite chips.											
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions			
						0	CCHE	(0-30'), CALICHE, coarse grain, well graded, white to tan, dry, no stain or odor.			
Dry	-	-	N	-	-	10					
Dry	-	-	N	-	-	20		@20' color change to pink/tan			
Dry	-	-	N	-	-	30	SP-SM	(30-78'), SAND, medium to fine grain, poorly graded with trace caliche nodules, red to orange, dry, no stain, no odor.			
Dry	-	-	N	-	-	40					
Dry	-	-	N	-	-	50		@50', slightly cohesive with trace clay			
Dry	-	-	N	-	-	60		NOTE: refusal @ 60' using air rotary drill rig due to abundant sand.			
Total Depth @ 60 feet bgs											



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Search Results -- 1 sites found

Agency code = usgs
site_no list =

- 320631103351401

Minimum number of levels = 1
[Save file of selected sites](#) to local disk for future upload

USGS 320631103351401 25S.33E.20.443313

Lea County, New Mexico
Latitude 32°06'31", Longitude 103°35'14" NAD27
Land-surface elevation 3,398 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](#)

[Tab-separated data](#)

[Graph of data](#)

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Date	Time	? Water-level date-time accuracy	? Parameter code	Water level, feet below land surface	Water level, feet above specific vertical datum	Referenced vertical datum	? Status	? Method of measurement	? Measuring agency	? Source of measurement
1981-03-25			D	62610	3192.01	NGVD29	1	Z		
1981-03-25			D	62611	3193.64	NAVD88	1	Z		
1981-03-25			D	72019	204.36		1	Z		

Explanation

Section	Code	Description
Water-level date-time accuracy	D	Date is accurate to the Day
Parameter code	62610	Groundwater level above NGVD 1929, feet
Parameter code	62611	Groundwater level above NAVD 1988, feet
Parameter code	72019	Depth to water level, feet below land surface
Referenced vertical datum	NAVD88	North American Vertical Datum of 1988
Referenced vertical datum	NGVD29	National Geodetic Vertical Datum of 1929
Status	1	Static

Section	Code	Description
Method of measurement	Z	Other.
Measuring agency		Not determined
Source of measurement		Not determined
Water-level approval status	A	Approved for publication -- Processing and review completed.

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[U.S. Department of the Interior](#) | [U.S. Geological Survey](#)
Title: Groundwater for New Mexico: Water Levels
URL: <https://nwis.waterdata.usgs.gov/nm/nwis/gwlevels?>



Page Contact Information: [New Mexico Water Data Maintainer](#)
Page Last Modified: 2023-06-22 11:22:49 EDT
0.27 0.25 nadww01



APPENDIX B

Photographic Log

**Photographic Log**

BTA Oil Producers, LLC

Rojo 10-13 34-37 Tank Battery

Incident Number nAPP2129826922



Photograph: 1 Date: 6/19/2023
Description: View of the lined containment deemed to be in good condition, facing east.



Photograph: 2 Date: 6/19/2023
Description: View of the lined containment deemed to be in good condition, facing west.



Photograph: 3 Date: 6/19/2023
Description: View of the lined containment deemed to be in good condition, facing south.



Photograph: 4 Date: 6/19/2023
Description: View of the lined containment deemed to be in good condition, facing north.



APPENDIX C

Laboratory Analytical Reports & Chain of Custody Documentation



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

June 22, 2023

HADLIE GREEN

ENSOLUM

3122 NATIONAL PARKS HWY

CARLSBAD, NM 88220

RE: ROJO 10 -13, 34 - 37 TANK

Enclosed are the results of analyses for samples received by the laboratory on 06/19/23 14:30.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. 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.

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:

ENSOLUM
HADLIE GREEN
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220
Fax To:

Received:	06/19/2023	Sampling Date:	06/16/2023
Reported:	06/22/2023	Sampling Type:	Soil
Project Name:	ROJO 10 -13, 34 - 37 TANK	Sampling Condition:	Cool & Intact
Project Number:	03C2012063 (32.10836 - 103.55317)	Sample Received By:	Tamara Oldaker
Project Location:	BTA - LEA CO		

Sample ID: SS 01 0.5' (H233150-01)

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	06/21/2023	ND	1.85	92.5	2.00	2.76	
Toluene*	<0.050	0.050	06/21/2023	ND	1.85	92.6	2.00	2.49	
Ethylbenzene*	<0.050	0.050	06/21/2023	ND	1.90	94.8	2.00	2.68	
Total Xylenes*	<0.150	0.150	06/21/2023	ND	5.79	96.5	6.00	1.73	
Total BTX	<0.300	0.300	06/21/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 107 % 71.5-134

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	06/20/2023	ND	432	108	400	3.77	

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	06/21/2023	ND	159	79.7	200	1.93	
DRO >C10-C28*	<10.0	10.0	06/21/2023	ND	158	79.1	200	2.15	
EXT DRO >C28-C36	<10.0	10.0	06/21/2023	ND					

Surrogate: 1-Chlorooctane 132 % 48.2-134

Surrogate: 1-Chlorooctadecane 140 % 49.1-148

Cardinal Laboratories

*=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:

ENSOLUM
HADLIE GREEN
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220
Fax To:

Received:	06/19/2023	Sampling Date:	06/16/2023
Reported:	06/22/2023	Sampling Type:	Soil
Project Name:	ROJO 10 -13, 34 - 37 TANK	Sampling Condition:	Cool & Intact
Project Number:	03C2012063 (32.10836 - 103.55317)	Sample Received By:	Tamara Oldaker
Project Location:	BTA - LEA CO		

Sample ID: SS 02 0.5' (H233150-02)

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	06/21/2023	ND	1.85	92.5	2.00	2.76		
Toluene*	<0.050	0.050	06/21/2023	ND	1.85	92.6	2.00	2.49		
Ethylbenzene*	<0.050	0.050	06/21/2023	ND	1.90	94.8	2.00	2.68		
Total Xylenes*	<0.150	0.150	06/21/2023	ND	5.79	96.5	6.00	1.73		
Total BTX	<0.300	0.300	06/21/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

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	06/20/2023	ND	432	108	400	3.77		

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	06/21/2023	ND	159	79.7	200	1.93	
DRO >C10-C28*	<10.0	10.0	06/21/2023	ND	158	79.1	200	2.15	
EXT DRO >C28-C36	<10.0	10.0	06/21/2023	ND					

Surrogate: 1-Chlorooctane 96.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 102 % 49.1-148

Cardinal Laboratories

*=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:

ENSOLUM
HADLIE GREEN
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220
Fax To:

Received:	06/19/2023	Sampling Date:	06/16/2023
Reported:	06/22/2023	Sampling Type:	Soil
Project Name:	ROJO 10 -13, 34 - 37 TANK	Sampling Condition:	Cool & Intact
Project Number:	03C2012063 (32.10836 - 103.55317)	Sample Received By:	Tamara Oldaker
Project Location:	BTA - LEA CO		

Sample ID: SS 03 0.5' (H233150-03)

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	06/21/2023	ND	1.85	92.5	2.00	2.76		
Toluene*	<0.050	0.050	06/21/2023	ND	1.85	92.6	2.00	2.49		
Ethylbenzene*	<0.050	0.050	06/21/2023	ND	1.90	94.8	2.00	2.68		
Total Xylenes*	<0.150	0.150	06/21/2023	ND	5.79	96.5	6.00	1.73		
Total BTX	<0.300	0.300	06/21/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

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	06/20/2023	ND	432	108	400	3.77		

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	06/21/2023	ND	159	79.7	200	1.93	
DRO >C10-C28*	<10.0	10.0	06/21/2023	ND	158	79.1	200	2.15	
EXT DRO >C28-C36	<10.0	10.0	06/21/2023	ND					

Surrogate: 1-Chlorooctane 97.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 102 % 49.1-148

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:

ENSOLUM
HADLIE GREEN
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220
Fax To:

Received:	06/19/2023	Sampling Date:	06/16/2023
Reported:	06/22/2023	Sampling Type:	Soil
Project Name:	ROJO 10 -13, 34 - 37 TANK	Sampling Condition:	Cool & Intact
Project Number:	03C2012063 (32.10836 - 103.55317)	Sample Received By:	Tamara Oldaker
Project Location:	BTA - LEA CO		

Sample ID: SS 04 0.5' (H233150-04)

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	06/21/2023	ND	1.85	92.5	2.00	2.76		
Toluene*	<0.050	0.050	06/21/2023	ND	1.85	92.6	2.00	2.49		
Ethylbenzene*	<0.050	0.050	06/21/2023	ND	1.90	94.8	2.00	2.68		
Total Xylenes*	<0.150	0.150	06/21/2023	ND	5.79	96.5	6.00	1.73		
Total BTX	<0.300	0.300	06/21/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

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	06/20/2023	ND	416	104	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	06/21/2023	ND	159	79.7	200	1.93	
DRO >C10-C28*	<10.0	10.0	06/21/2023	ND	158	79.1	200	2.15	
EXT DRO >C28-C36	<10.0	10.0	06/21/2023	ND					

Surrogate: 1-Chlorooctane 86.4 % 48.2-134

Surrogate: 1-Chlorooctadecane 87.2 % 49.1-148

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

Notes and Definitions

BS-3	Blank spike recovery outside of lab established statistical limits, but still within method limits. Data is not adversely affected.
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

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.

A handwritten signature in black ink, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager



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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]

† Cardinal cannot accept verbal changes. Please email changes to celey.keene@cardinallabsnm.com



APPENDIX D

NMOCD Notifications

From: [Enviro, OCD, EMNRD](#)
To: [Hadlie Green](#)
Cc: [Bratcher, Michael, EMNRD](#); [Velez, Nelson, EMNRD](#)
Subject: RE: [EXTERNAL] RE: BTA - Containment Inspection - Rojo 10-13 34-37 Tank Battery (Incident Number nAPP2129826922)
Date: Thursday, June 15, 2023 10:09:53 AM
Attachments: [image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)

[**EXTERNAL EMAIL**]

Hadlie,

Thank you for the notification. Please include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

JH

Jocelyn Harimon • Environmental Specialist
Environmental Bureau
EMNRD - Oil Conservation Division
1220 South St. Francis Drive | Santa Fe, NM 87505
(505)469-2821 | Jocelyn.Harimon@emnrd.nm.gov
[http:// www.emnrd.nm.gov](http://www.emnrd.nm.gov)



From: Hadlie Green <hgreen@ensolum.com>
Sent: Wednesday, June 14, 2023 11:04 AM
To: Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>
Cc: Tacoma Morrissey <tmorrissey@ensolum.com>; Kelton Beaird <KBeaird@btaoil.com>
Subject: [EXTERNAL] RE: BTA - Containment Inspection - Rojo 10-13 34-37 Tank Battery (Incident Number nAPP2129826922)

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Apologies, the date is incorrect in the email below. This is a notification that Ensolum is scheduled to inspect this lined containment on behalf of BTA on Monday, June 19, 2023. Please call with any questions or concerns.

Thank you,

| **Hadlie Green**



Project Geologist
432-557-8895
hgreen@ensolum.com
Ensolum, LLC
in f

From: Hadlie Green

Sent: Wednesday, June 14, 2023 12:02 PM

To: OCD.Enviro@state.nm.us

Cc: Tacoma Morrissey <tmorrissey@ensolum.com>; Kelton Beaird <KBeaird@btaoil.com>

Subject: BTA - Containment Inspection - Rojo 10-13 34-37 Tank Battery (Incident Number nAPP2129826922)

To Whom It May Concern,

Below is an email notification for liner inspection at BTA Oil Producers, LLC (BTA) Rojo 10-13 34-37 Tank Battery (Incident Number nAPP2129826922) / Spill Date 10-24-2021. This is a notification that Ensolum is scheduled to inspect this lined containment on behalf of BTA on Monday, June 14, 2023. Please call with any questions or concerns.

GPS: 32.10836, -103.55317

Thank you,



Hadlie Green
Project Geologist
432-557-8895
hgreen@ensolum.com
Ensolum, LLC
in f



APPENDIX E

Final C-141

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	nAPP2129826922
District RP	
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) nAPP2129826922
Contact mailing address: 104 S. Pecos St., Midland, TX 79701	

Location of Release Source

Latitude: 32.10836 Longitude: -103.55317

(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Rojo 10-13 34-37 Tank Battery	Site Type: Tank Battery
Date Release Discovered: 10/24/2021	API# (if applicable) Nearest well: Rojo 7811 22 Fee Com #11H API #30-025-44459

Unit Letter	Section	Township	Range	County
A	27	25S	33E	Lea

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☒ Private (Name: CAML Ltd, PO Box 3157, San Angelo, TX 76902)

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) 40 BBL	Volume Recovered (bbls) 40 BBL
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input checked="" 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

Overflowed Water Tank Into Lined Secondary Containment. A float bottomed out and did not pick back up to send a high-level alarm or turn on a pump. As a result, 40 BW from the water tank overflowed into lined secondary containment. All water was recovered by vacuum trucks and returned to the water tanks. The reported volume is based on actual water volume recovered by the vacuum trucks.

Form C-141

Page 2

State of New Mexico
Oil Conservation Division

Incident ID	nAPP2129826922
District RP	
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? The NMOCD Rules define a "major release" as an unauthorized release of a volume that results in a fire or is the result of a fire.
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? Submitted NOR via NMOCD Permitting Portal on 10/25/2021. The Incident ID was assigned just after the NOR submittal.	

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

- ☒ The source of the release has been stopped.
- ☒ The impacted area has been secured to protect human health and the environment.
- ☒ Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.
- ☒ All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not 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: Bob Hall Title: Environmental Manager

Signature:  Date: 10/25/2021

email: bhall@btaoil.com

Telephone: 432-682-3753

OCD Only

Ramona Marcus

10/29/2021

Received by: _____ Date: _____

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 57574

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 57574
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
marcus	When submitting future reports regarding this release, please submit the calculations used or specific justification for the volumes reported on the initial C-141	10/29/2021

Incident ID	nAPP2129826922
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>50-100</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

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

Page 4

Incident ID	nAPP2129826922
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: Kelton Beaird Title: Environmental Manager

Signature:  Date: 8/2/2023

email: KBeaird@btaoil.com Telephone: 432-312-2203

OCD Only

Received by: Shelly Wells Date: 8/3/2023

Incident ID	nAPP2129826922
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

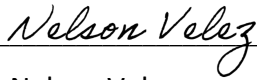
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public 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: Kelton Beaird Title: Environmental Manager
Signature:  Date: 8/2/2023
email: KBeaird@btaoil.com Telephone: 432-312-2203

OCD Only

Received by: Shelly Wells Date: 8/3/2023

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:  Date: 11/02/2023
Printed Name: Nelson Velez Title: Environmental Specialist - Adv

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 247624

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 247624
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
nvelez	Liner inspection approved. Release resolved.	11/2/2023