



July 29, 2024

District Supervisor
Oil Conservation Division, District 1
1625 North French Drive
Hobbs, New Mexico 88240

**Re: Liner Inspection and Closure Request
BTA Oil Producers, LLC
Rojo 14H-17H 26H-29H Battery Release
Unit Letter P, Section 22, Township 25 South, Range 33 East
Lea County, New Mexico
Incident ID# nAPP2418357364**

Sir or Madam:

BTA Oil Producers, LLC (BTA) contracted Tetra Tech, Inc. (Tetra Tech) to assess a release that occurred within a tank battery. The release footprint is located within Public Land Survey System (PLSS) Unit Letter P, Section 22, Township 25 South, Range 33 East, in Lea County, New Mexico (Site). The approximate release point occurred at coordinates 32.110804°, -103.555872°, as shown on Figure 1 and Figure 2. This release is located on private land.

BACKGROUND

On June 30, 2024, a release was discovered at the Rojo 14H-17H 26H-29H Battery. The cause of the release is indicated in the NOR as human error, i.e. an out of service tank valve being inadvertently opened. Photographs provided by BTA indicate that the release footprint was limited to the lined containment area, as presented in Figure 3. The release was reported as approximately 90 bbls of produced water, of which 90 bbls of produced water were recovered. A Notification of Release (NOR) was submitted to the New Mexico Oil Conservation Division (NMOCD) online portal system. Following the NOR submittal the release was assigned the Incident ID nAPP2418357364. The NMOCD initial C-141 Initial Report was duly submitted via the NMOCD online portal system within the required timeframe. A copy of the NMOCD initial C-141 and NOR are included in Appendix A.

SITE CHARACTERIZATION

A site characterization was performed in accordance with 19.15.29.11 New Mexico State Administrative Code (NMAC) and the guidance document Process Updates re: Submissions of Form C-141 Release Notification and Corrective Actions (12/01/2023).

A summary of the site characterization is presented below:

Shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (feet bgs)	< 50 feet bgs
Method used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water?	No
<u>The minimum distance between the closest lateral extents of the release and the following surface areas:</u>	

Tetra Tech

901 West Wall St., Suite 100, Midland, TX 79701

Tel 432.682.4559 Fax 432.682.3946 www.tetrattech.com

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July 29, 2024

BTA Oil Producers, LLC

A continuously flowing watercourse or any other significant watercourse	> 5 miles
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	3.46 miles
An occupied permanent residence, school, hospital, institution, or church	> 5 miles
A spring or private domestic fresh water well used by less than five households for domestic or stock watering purposes	2.11 miles
Any other fresh water well or spring	> 5 miles
Incorporated municipal boundaries or a defined municipal fresh water well field	> 5 miles
A wetland	> 5 miles
A subsurface mine	> 5 miles
A (non-karst) unstable area	>5 miles
Categorized risk of this well / site being in a karst geology	Low
A 100-year floodplain	> 5 miles
Did the release impact areas not on an exploration, development, production, or storage site?	No

According to the New Mexico Office of the State Engineers (NMOSE) reporting system, there is one (1) ground water well record within ½ mile (800 meters) of the Site located approximately 686 meters southwest of the release location. No depth to water is included in the NMOSE report. The site characterization data are presented in Appendix B.

REGULATORY FRAMEWORK

Based upon the release footprint and in accordance with Subsection E of 19.15.29.12 NMAC, per 19.15.29.11 NMAC, the site characterization data was used to determine recommended remedial action levels (RRALs) for benzene, toluene, ethylbenzene, and xylene (collectively referred to as BTEX), total petroleum hydrocarbons (TPH), and chlorides in soil.

Based on the absence of groundwater level data from water wells within ½ mile of the Site, the strictest Table I closure criteria will be applied to this release incident. Thus, based on the site characterization, and in accordance with Table I of 19.15.29.12 NMAC, the RRALs for the Site are as follows:

Constituent	Site RRAL
Chloride	600 mg/kg
TPH (GRO+DRO+ORO)	100 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

Based upon the release footprint as contained completely within a lined secondary containment structure and in accordance with Subsection A(5)(a) of 19.15.29.11 NMAC, If the release occurred within a lined containment area, the responsible party must demonstrate liner integrity after affected material is removed and the affected area of the liner is exposed and provide the following:

- Certification on Form C-141 that the responsible party has visually inspected the liner where the release occurred, and the liner remains intact and had the ability to contain the leak in question; and

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BTA Oil Producers, LLC

- The appropriate division district office is provided notification at least two business days before conducting the liner inspection.

LINER INTEGRITY

Prior to the liner inspection, the facility was power washed, thus, the integrity of the liner could be inspected and confirmed clean. In accordance with 19.15.29.11(A)(5)(a) NMAC, notification of a liner inspection at the Rojo 14H-17H 26H-29H Battery was submitted via the NMOCD portal on July 15, 2024. The liner inspection notification email is included in Appendix C.

On July 18, 2024, Tetra Tech personnel performed an inspection of the liner within the containment area of the Rojo 14H-17H 26H-29H Battery. This work was completed to verify the integrity of the liner. The liner was observed to underlie the entirety of the tank battery containment area. The liner was intact with no visible rips or tears and encompassed by an approximately 2-foot-tall muscle wall. The liner was anchored on the interior. At the time of the inspection, the liner was intact and had the ability to contain the documented release. Photographic documentation of the liner inspection is included in Appendix D.

CONCLUSION

Based on the results of the liner inspection, BTA respectfully requests closure of the subject line incident. The release occurred within a lined containment area. The liner integrity demonstration is complete. The affected area of the liner has been visually inspected where the release occurred, and the liner remains intact and had the ability to contain the leak in question. Two business days' notice (C-141N) was provided to the appropriate division district office before conducting the liner inspection.

The final C-141 forms are enclosed in Appendix A. If you have any questions concerning the liner inspection for the Site, please call me at (512) 560-9064 or Christian at (512) 338-2861.

Sincerely,

Tetra Tech, Inc.



Nicholas M. Poole, G.I.T.
Project Manager



Christian M. Llull, P.G.
Program Manager

cc:

Mr. Ray Ramos, BTA Oil Producers, LLC

Liner Inspection and Closure Request
July 29, 2024

BTA Oil Producers, LLC

LIST OF ATTACHMENTS

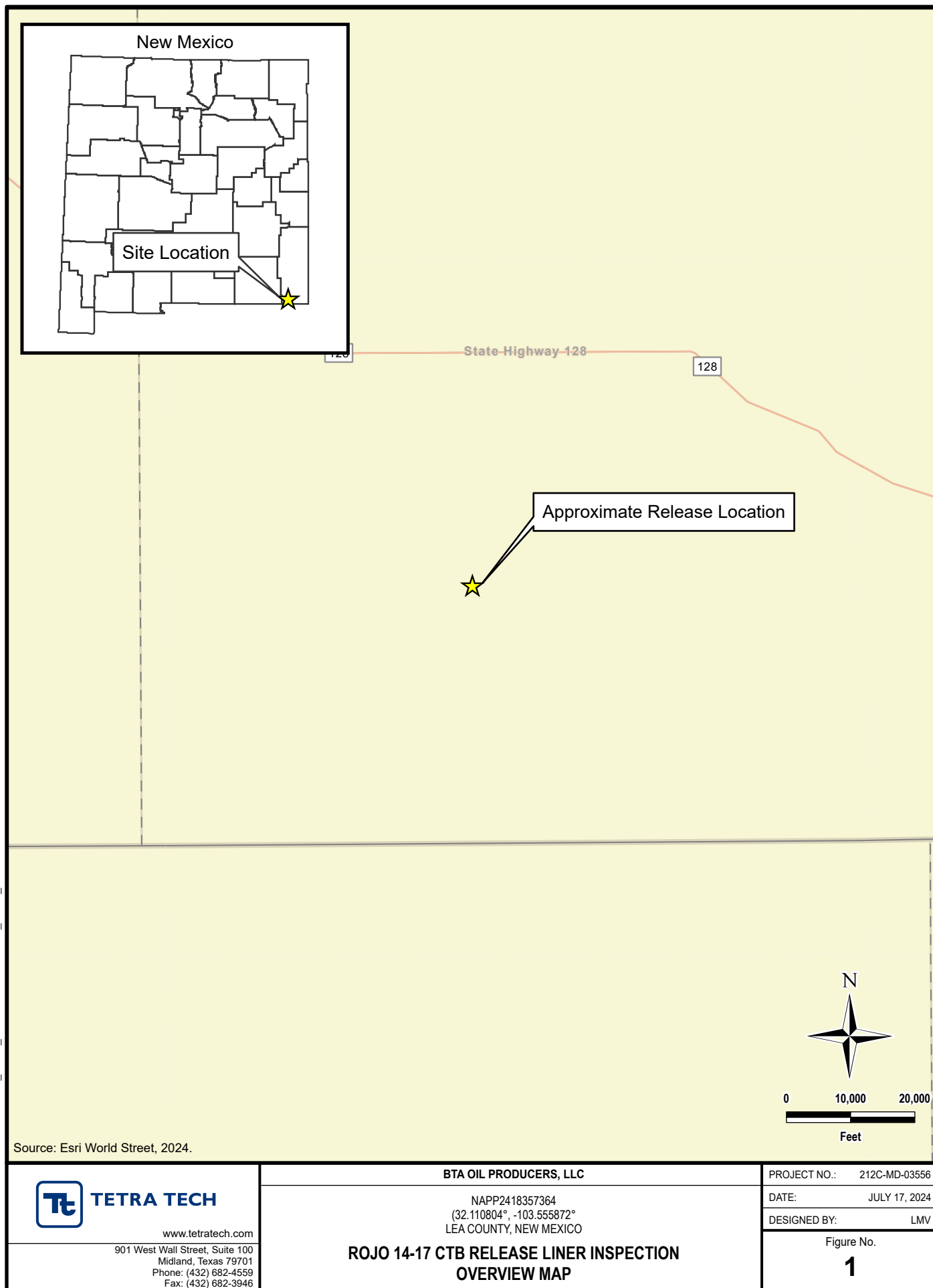
Figures:

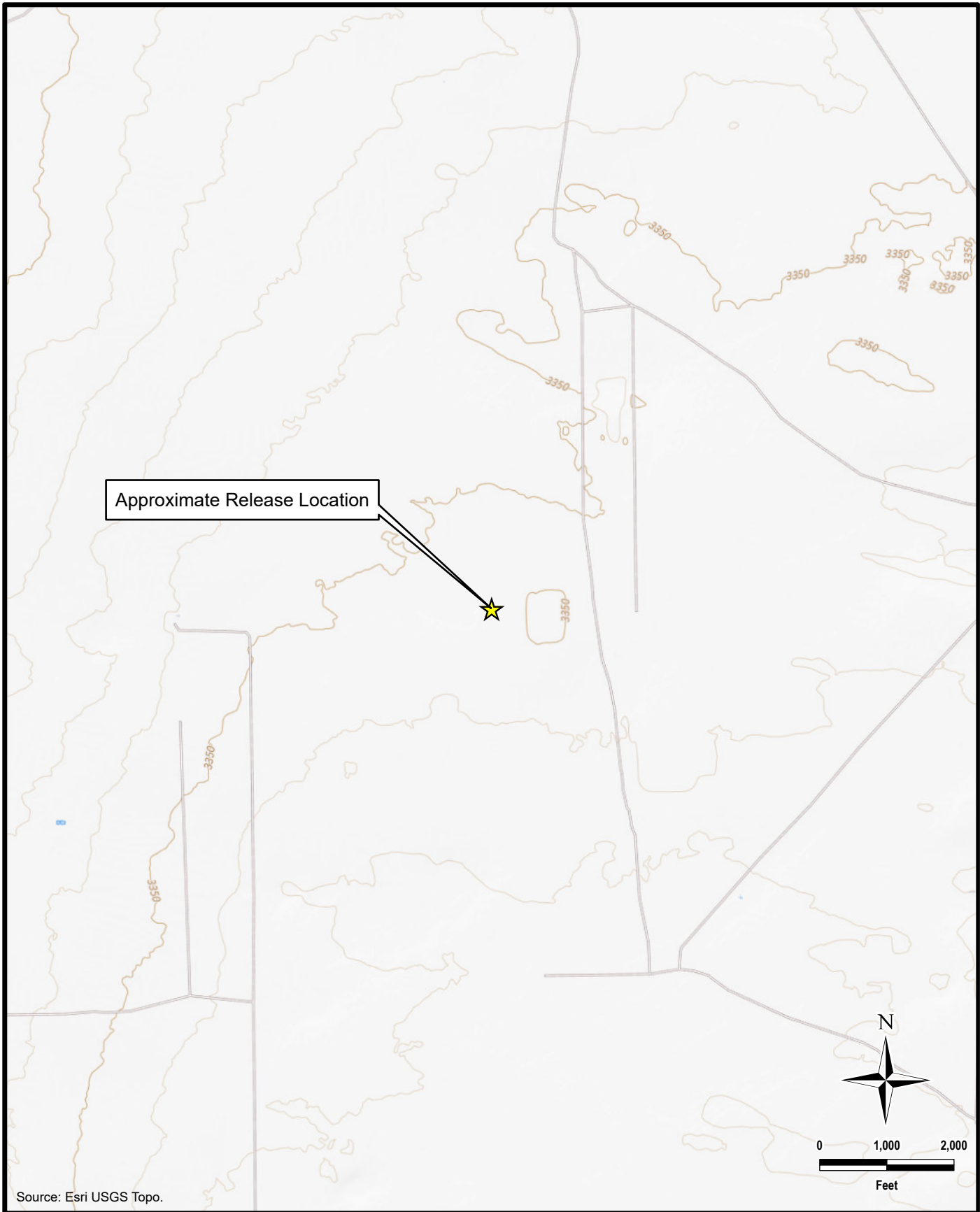
- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Approximate Release Extent and Liner Inspection

Appendices:


- Appendix A – C-141 Forms
- Appendix B – Site Characterization Data
- Appendix C – Regulatory Correspondence
- Appendix D – Photographic Documentation

FIGURES







DOCUMENT PATH: Y:\BTA\212C-MD-03556_ROJO_14-17\212C-MD-03556_ROJO_14-17.APRX

<div>TETRA TECH</div> <div>www.tetrattech.com</div> <div>901 West Wall Street, Suite 100 Midland, Texas 79701 Phone: (432) 682-4559 Fax: (432) 682-3946</div>	BTA OIL PRODUCERS, LLC		PROJECT NO.: 212C-MD-03556
	NAPP2418357364 (32.110804°, -103.555872°) LEA COUNTY, NEW MEXICO		DATE: JULY 17, 2024
	ROJO 14-17 CTB RELEASE LINER INSPECTION TOPOGRAPHIC MAP		DESIGNED BY: LMV
			Figure No. 2



Legend

-  Approximate Release Extent
-  Lined Secondary Containment Area

Source: Google Earth, 2023.



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BTA OIL PRODUCERS, LLC

NAPP2418357364
(32.110804°, -103.555872°)
LEA COUNTY, NEW MEXICO

**ROJO 14-17 CTB RELEASE LINER INSPECTION
APPROXIMATE RELEASE EXTENT AND LINER INSPECTION**

PROJECT NO.: 212C-MD-03556

DATE: JULY 17, 2024

DESIGNED BY: LMV

Figure No.

3

DOCUMENT PATH: Y:\BTA\212C-MD-03556_ROJO_14-17\212C-MD-03556_ROJO_14-17.APRX

APPENDIX A C-141 Forms

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

QUESTIONS

Action 360227

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 360227
	Action Type: [NOTIFY] Notification Of Release (NOR)

QUESTIONS

Location of Release Source <i>Please answer all the questions in this group.</i>	
Site Name	Rojo 14H-17H 26-29H Battery Release
Date Release Discovered	06/30/2024
Surface Owner	Private

Incident Details <i>Please answer all the questions in this group.</i>	
Incident Type	Produced Water Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release <i>Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.</i>	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Human Error Separator Produced Water Released: 90 BBL Recovered: 90 BBL Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	A manway on the back of one of the storage tanks was not fully bolted on as the tank was out of service from a recent repair and the tank was not locked/tagged out resulting in the release of produced water into the lined secondary containment for the tank battery. The spill was fully captured within the lined containment which had undergone recent repairs. Initial response returned the full volume of released fluids to the storage tanks.

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QUESTIONS, Page 2
Action 360227

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 360227
	Action Type: [NOTIFY] Notification Of Release (NOR)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

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	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.
Per Paragraph 4 of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. 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 prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.	

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ACKNOWLEDGMENTS

Action 360227

ACKNOWLEDGMENTS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 360227
	Action Type: [NOTIFY] Notification Of Release (NOR)

ACKNOWLEDGMENTS

<input checked="" type="checkbox"/>	I acknowledge that I am authorized to submit notification of a release on behalf of my operator.
<input checked="" type="checkbox"/>	I acknowledge that upon submitting this application, I will be creating a new incident file (assigned to my operator) to track the notification(s) and corrective action(s) for a release, pursuant to NMAC 19.15.29.
<input checked="" type="checkbox"/>	I acknowledge that creating a new incident file will require my operator to file subsequent submission(s) of form "C-141, Application for administrative approval of a release notification and corrective action", pursuant to NMAC 19.15.29.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	I acknowledge the fact that 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.
<input checked="" type="checkbox"/>	I acknowledge the fact that, 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.

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CONDITIONS

Action 360227

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 360227
	Action Type: [NOTIFY] Notification Of Release (NOR)

CONDITIONS

Created By	Condition	Condition Date
cterhune	When submitting future reports regarding this release, please submit the calculations used or specific justification for the volumes reported on the initial C-141.	7/1/2024

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Santa Fe, NM 87505

QUESTIONS

Action 362912

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 362912
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2418357364
Incident Name	NAPP2418357364 ROJO 14H-17H 26-29H BATTERY RELEASE @ 0
Incident Type	Produced Water Release
Incident Status	Initial C-141 Received
Incident Facility	[fAPP2130123218] Rojo 14 - 17

Location of Release Source	
Please answer all the questions in this group.	
Site Name	Rojo 14H-17H 26-29H Battery Release
Date Release Discovered	06/30/2024
Surface Owner	Private

Incident Details	
Please answer all the questions in this group.	
Incident Type	Produced Water Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Human Error Separator Produced Water Released: 90 BBL Recovered: 90 BBL Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	A manway on the back of one of the storage tanks was not fully bolted on as the tank was out of service from a recent repair and the tank was not locked/tagged out resulting in the release of produced water into the lined secondary containment for the tank battery. The spill was fully captured within the lined containment which had undergone recent repairs. Initial response returned the full volume of released fluids to the storage tanks.

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QUESTIONS, Page 2

Action 362912

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 362912
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

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	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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.

I hereby agree and sign off to the above statement	Name: Chuck Terhune Title: Program Manager Email: chuck.terhune@tetrattech.com Date: 07/10/2024
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QUESTIONS, Page 3

Action 362912

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 362912
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS**Site Characterization**

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). 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 in feet below ground surface (ft bgs)	Between 75 and 100 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Greater than 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between 1000 (ft.) and ½ (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1 and 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

Requesting a remediation plan approval with this submission	No
The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.	

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CONDITIONS

Action 362912

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 362912
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	None	7/11/2024

***** LIQUID SPILLS - VOLUME CALCULATIONS *****

Release Location Name: Rojo 14-17 CTB Date of Release: 6/30/2024

If the leak/spill is associated with production equipment, i.e. - wellhead, stuffing box, flowline, tank battery, production vessel, transfer pump, or storage tank place an "X" here: X

Input Data:

If spill volumes from measurement, i.e. metering, tank volumes, etc. are known enter the volumes here:

OIL: BBL

WATER: 90.0000 BBL

If "known" spill volumes are given, input data for the following "Area Calculations" is optional. The above will override the calculated volumes.

Total Area Calculations						Standing Liquid Calculations							
Total Surface Area	width	length	wet soil depth	oil (%)	Standing Liquid Area	width	length	liquid depth	oil (%)				
Rectangle Area #1	50.00 ft	X	60.00 ft	X	0.00 in	0.00%	Rectangle Area #1	50.00 ft	X	60.00 ft	X	2.00 in	0.00%
Rectangle Area #2	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #2	0.00 ft	X	0.00 ft	X	0.00 in	0.00%
Rectangle Area #3	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #3	0.00 ft	X	0.00 ft	X	0.00 in	0.00%
Rectangle Area #4	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #4	0.00 ft	X	0.00 ft	X	0.00 in	0.00%
Rectangle Area #5	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #5	0.00 ft	X	0.00 ft	X	0.00 in	0.00%
Rectangle Area #6	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #6	0.00 ft	X	0.00 ft	X	0.00 in	0.00%
Rectangle Area #7	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #7	0.00 ft	X	0.00 ft	X	0.00 in	0.00%
Rectangle Area #8	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #8	0.00 ft	X	0.00 ft	X	0.00 in	0.00%

production system leak - DAILY PRODUCTION DATA REQUIRED

Average Daily Production:

Oil BBL

Water BBL

Did leak occur before the separator?: YES X N/A (place an "X")

Amount of Free Liquid Recovered:

90 BBL

ERROR - Recovered volume greater than spilled volume

Percentage of Oil in Free Liquid Recovered:

0.00%

(percentage)

Liquid holding factor *:

0.00 gal per gal

Use the following when the spill wets the grains of the soil.

* sand = .08 gallon liquid per gallon volume of soil.

* gravelly (caliche) loam = .14 gallon liquid per gallon volume of soil.

* sandy clay loam soil = .14 gallon liquid per gallon volume of soil.

* clay loam = .16 gallon liquid per gallon volume of soil.

Use the following when the liquid completely fills the pore space of the soil:

Occurs when the spill soaked soil is contained by barriers, natural (or not).

* gravelly (caliche) loam = .25 gallon liquid per gallon volume of soil.

* sandy loam = .5 gallon liquid per gallon volume of soil.

Saturated Soil Volume Calculations:			Free Liquid Volume Calculations:		
Total Solid/Liquid Volume:	H2O cu. ft.	OIL cu. ft.	Total Free Liquid Volume:	H2O cu. ft.	OIL cu. ft.
3,000 sq. ft.			3,000 sq. ft.	500 cu. ft.	
Estimated Volumes Spilled			Estimated Production Volumes Lost		
Liquid in Soil:	H2O 0.0 BBL	OIL 0.0 BBL	Estimated Production Spilled:	H2O 90.0 BBL	OIL 0.0 BBL
Free Liquid:	89.0 BBL	0.0 BBL	Estimated Surface Damage		
Totals:	89.0 BBL	0.0 BBL	Surface Area:	3,000 sq. ft.	
			Surface Area:	.0689 acre	
Total Spill Liquid:	90.0 BBL	0.0 BBL	Estimated Weights, and Volumes		
Recovered Volumes			Saturated Soil =	lbs	cu.ft.
Estimated oil recovered:	0.0 BBL	check - okay	Total Liquid =	90 BBL	3,780 gallon
Estimated water recovered:	90.0 BBL	check - okay			31,450 lbs

Incident ID	
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?	_____ (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input 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 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 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 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 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 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 type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input 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.

State of New Mexico
Oil Conservation Division

Page 4

Incident ID	
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: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

Incident ID	
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: _____ Title: _____

Signature:  _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

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: _____

Printed Name: _____ Title: _____

APPENDIX B

Site Characterization Data

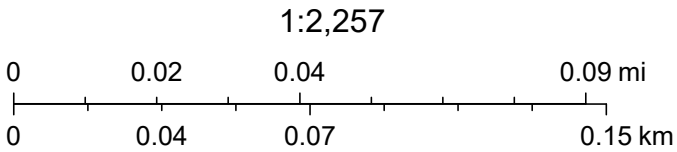
NM OCD - Land Ownership Map



7/19/2024, 11:45:41 AM

Land Ownership

P



U.S. BLM, Maxar, Microsoft, Esri, HERE, Garmin, iPC



Land Status

0 0.01 0.01 0.02
mi



New Mexico State Land Office

Disclaimer:
The New Mexico State Land Office assumes no responsibility or liability for, or in connection with the accuracy, reliability or use of the information provided herein with respect to State Land Office data or data from other sources.

Data pertaining to New Mexico State Trust Lands are provisional and subject to revision, and do not constitute an official record of title. Official records may be reviewed at the New Mexico State Land Office in Santa Fe, New Mexico.

Released to Imaging: 8/5/2024 3:47:16 PM

map Created: 7/19/2024



Oil and Gas Leasing Restrictions



Energy Leases



Agricultural Leases



Oil and Gas Leases



Minerals Leases



Commercial Leases

New Mexico State Trust Lands



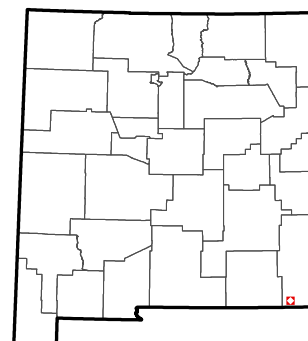
Subsurface Estate



Surface Estate



Both Estates





New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced,
O=orphaned,
C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

POD Number	POD Sub-Code	basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Distance	Depth Well	Depth Water	Water Column
C 04698 POD1	CUB	LE		2	1	4	27	25S	33E	635652	3553287	686	80		

Average Depth to Water: --

Minimum Depth: --

Maximum Depth: --

Record Count: 1

UTM NAD83 Radius Search (in meters):

Easting (X): 636247

Northing (Y): 3553630

Radius: 800

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

7/10/24 3:17 PM

Page 1 of 1

WATER COLUMN/ AVERAGE
DEPTH TO WATER



New Mexico Office of the State Engineer

Point of Diversion Summary

		(quarters are 1=NW 2=NE 3=SW 4=SE) (quarters are smallest to largest)							(NAD83 UTM in meters)	
Well Tag	POD Number	Q64	Q16	Q4	Sec	Tws	Rng	X	Y	
NA	C 04698 POD1	2	1	4	27	25S	33E	635652	3553287 	
Driller License:	1184	Driller Company:		WEST TEXAS WATER WELL SERVICE						
Driller Name:	RUSSELL SUTHERLAND									
Drill Start Date:	01/18/2023	Drill Finish Date:		01/18/2023		Plug Date:		01/23/2023		
Log File Date:	06/12/2023	PCW Rcv Date:				Source:				
Pump Type:		Pipe Discharge Size:				Estimated Yield:				
Casing Size:		Depth Well:		80 feet		Depth Water:				


The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

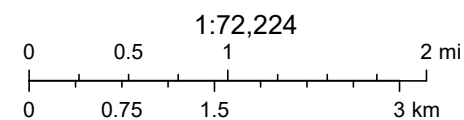
NM OCD Permian Basin Karst Areas



7/16/2024, 3:23:31 PM

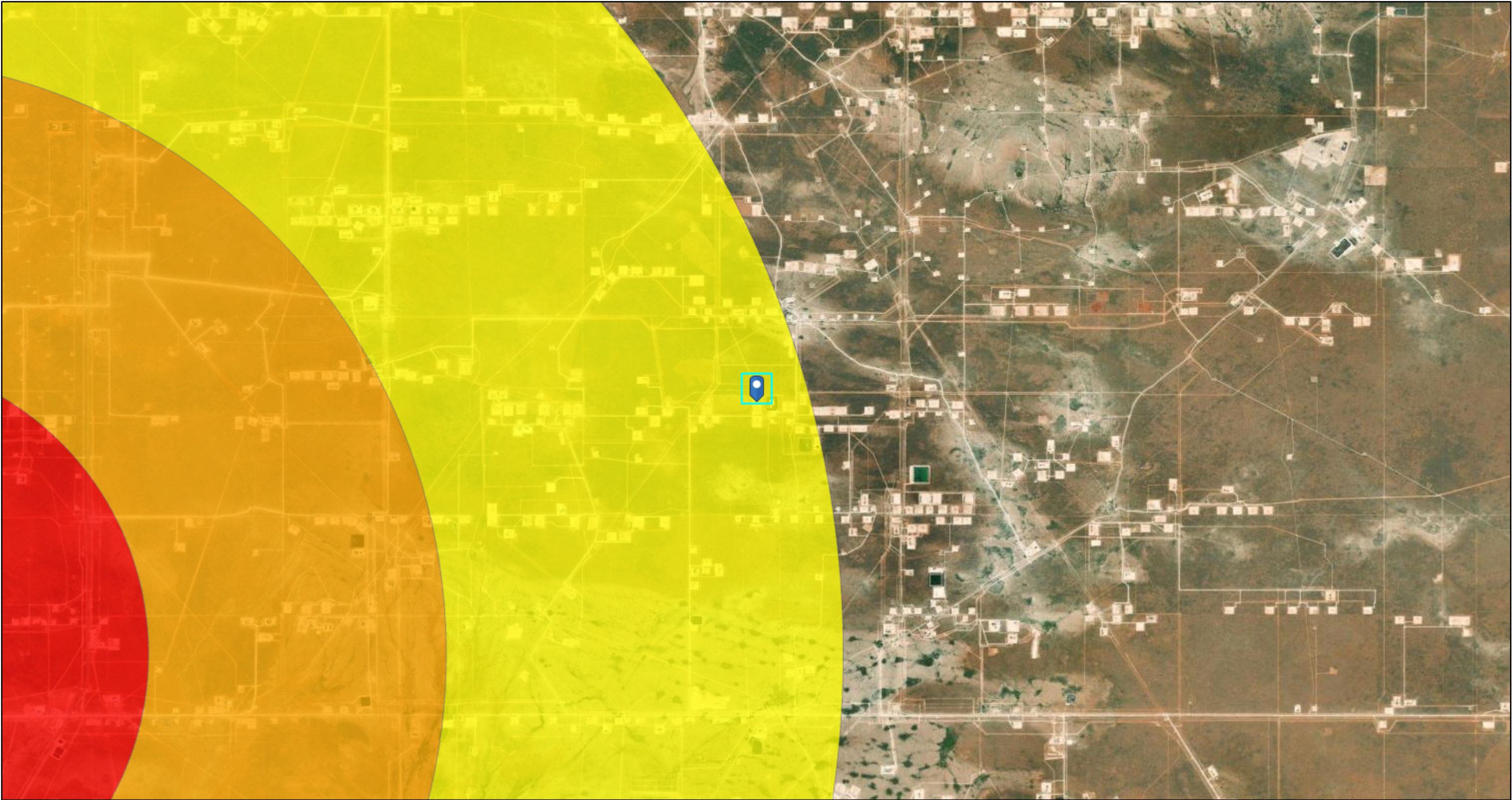
Karst Occurrence Potential

	Low
	Medium



BLM, OCD, New Mexico Tech, Esri, HERE, Garmin, Earthstar Geographics

NM OCD - Unstable Area (non-karst)

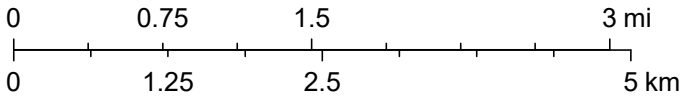


7/19/2024, 11:52:04 AM

Seismic Response 3.0 to 3.4

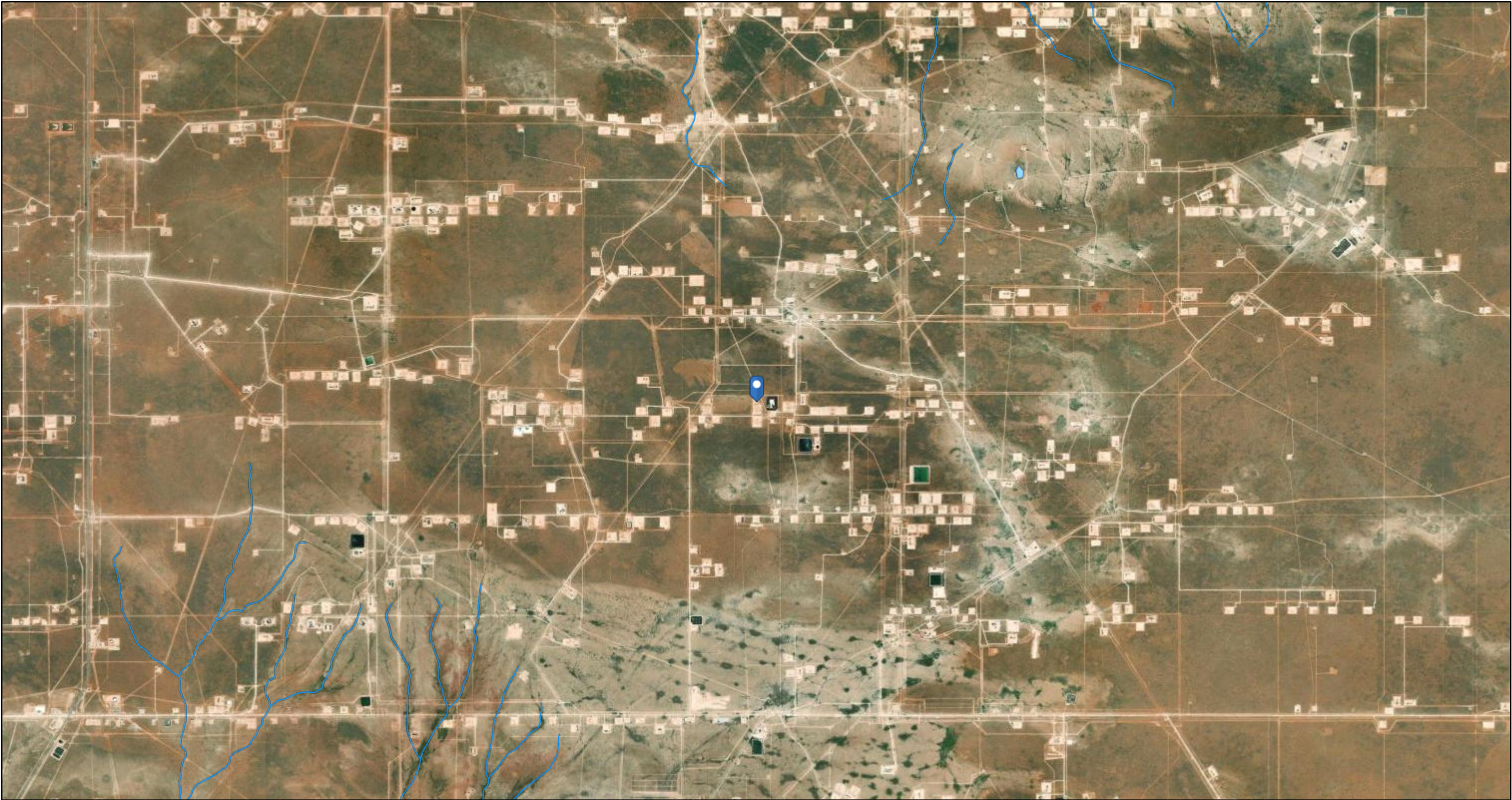
- 3 mi.
- 6 mi.
- 10 mi.

1:72,224



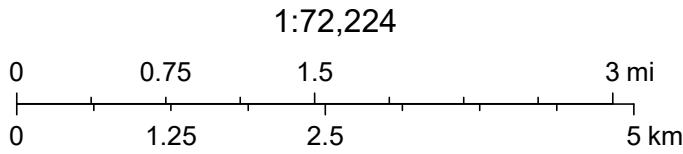
Oil Conservation Division (OCD), Energy, Minerals and Natural Resources Department (EMNRD), Esri, HERE, Garmin, Earthstar Geographics

NM OCD - Waterbodies Map



7/19/2024, 11:54:06 AM

- OSW Water Bodys
- OSE Streams



Esri, HERE, Garmin, Earthstar Geographics, NM OSE

National Flood Hazard Layer FIRMette



103°33'40"W 32°6'54"N



0 250 500 1,000 1,500 2,000 Feet

1:6,000

103°33'12"W 32°6'24"N

Released to Imaging: 8/5/2024 3:47:16 PM

Basemap Imagery Source: USGS National Map 2023

Legend

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

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



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

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

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 7/10/2024 at 5:35 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

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



Rojo 14-17 CTB Wetlands



July 10, 2024

Wetlands

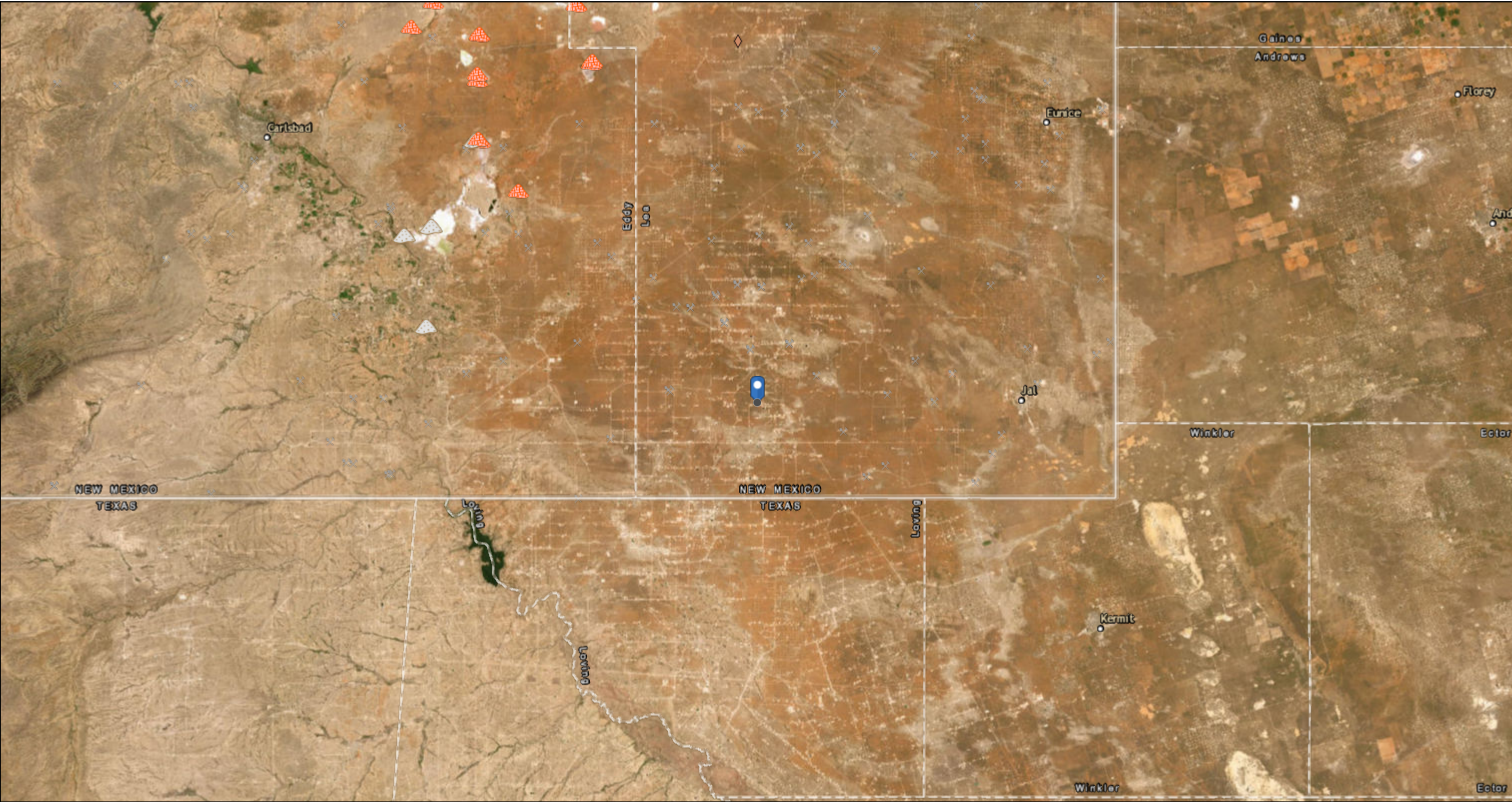
- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond

- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

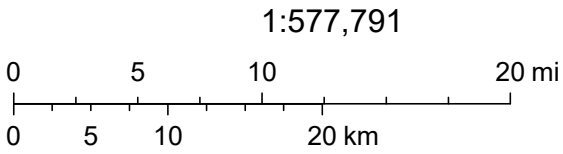
Active Mines in New Mexico



7/19/2024, 11:57:11 AM

Registered Mines

- | | | | |
|---|-----------------------|---|-----------------------------|
| × | Aggregate, Stone etc. | △ | Potash |
| × | Aggregate, Stone etc. | △ | Salt |
| × | Aggregate, Stone etc. | ◇ | Industrial Minerals (Other) |



Esri, HERE, Garmin, Earthstar Geographics



APPENDIX C

Regulatory Correspondence

Poole, Nicholas

From: OCDOnline@state.nm.us
Sent: Monday, July 15, 2024 3:01 PM
To: Poole, Nicholas
Subject: The Oil Conservation Division (OCD) has accepted the application, Application ID: 364140

You don't often get email from ocdonline@state.nm.us. [Learn why this is important](#)

 **CAUTION:** This email originated from an external sender. Verify the source before opening links or attachments. 

To whom it may concern (c/o Nick Poole for BTA OIL PRODUCERS, LLC),

The OCD has received the submitted *Notification for Liner Inspection for a Release* (C-141L), for incident ID (n#) nAPP2418357364.

The liner inspection is expected to take place:

When: 07/18/2024 @ 09:00

Where: P-22-25S-33E 0 FNL 0 FEL (32.110804,-103.555872)

Additional Information: Please contact Nick Poole of Tetra Tech at nicholas.poole@tetrattech.com to coordinate liner inspection observation.

Additional Instructions: The liner inspection is at 32.110798, -103.555882, from the intersection of J-2 and Battle Axe Road: Head northeast on Battle Axe Rd for 1.5 miles, then Turn left and travel for 62 ft, then Turn left and travel for 1.7 miles, then Turn right and travel for 2.3 mi, then Turn left and travel for 0.2 mi then turn left and travel for 0.3 mi then turn right and travel for 0.2 mi then Turn left Destination will be on the right

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, liner inspection pursuant to 19.15.29.11.A(5)(a) NMAC is required. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

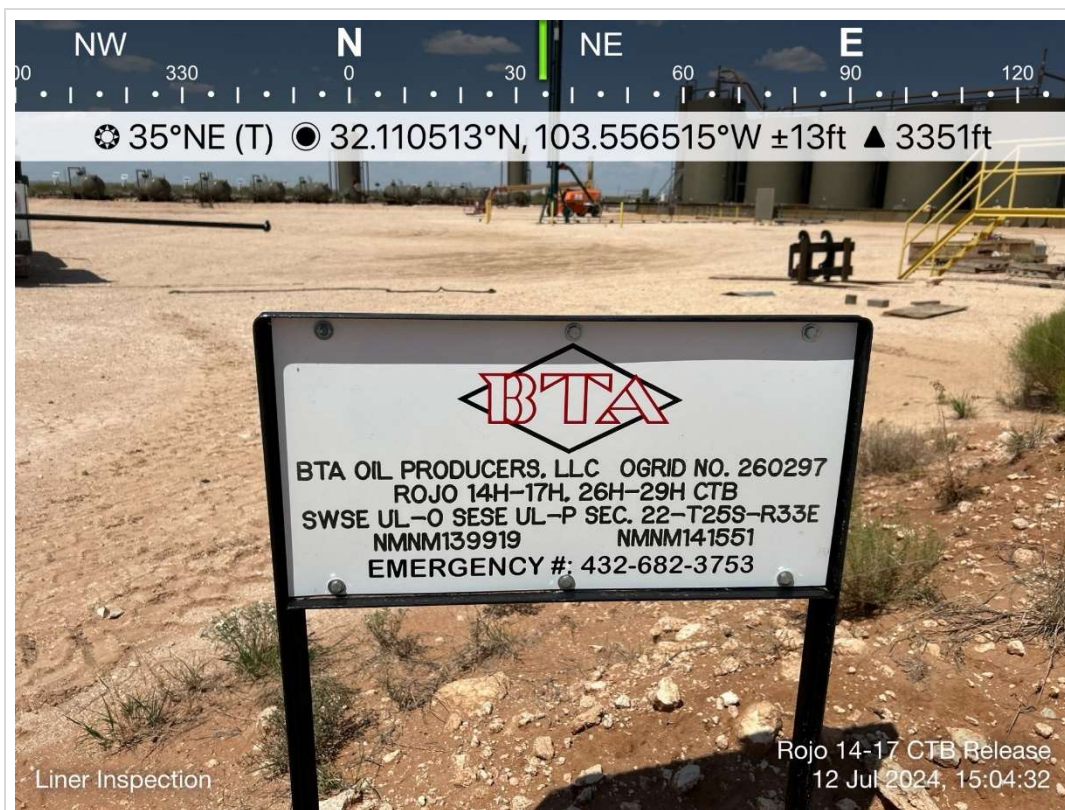
- **Failure to notify the OCD of liner inspections including any changes in date/time per the requirements of 19.15.29.11.A(5)(a)(ii) NMAC, may result in the inspection not being accepted.**

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

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

APPENDIX D

Photographic Documentation



TETRA TECH, INC. PROJECT NO. 212C-MD-03556	DESCRIPTION	Site Signage. Rojo 14H-17H and location information.	1
	SITE NAME	ROJO 14H-17H, 26H-19H CTB	7/12/2024



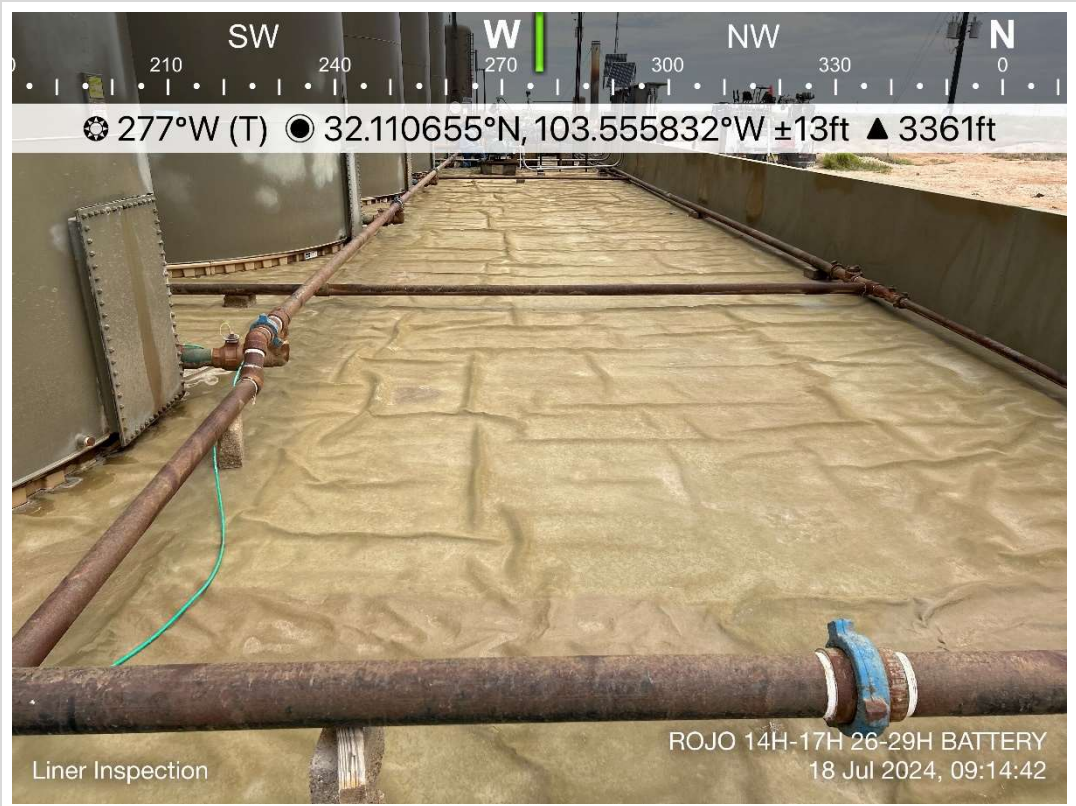
TETRA TECH, INC. PROJECT NO. 212C-MD-03556	DESCRIPTION	View north. Current lined containment area conditions; no rips, holes or tears observed.	2
	SITE NAME	ROJO 14H-17H, 26H-19H CTB	7/18/2024



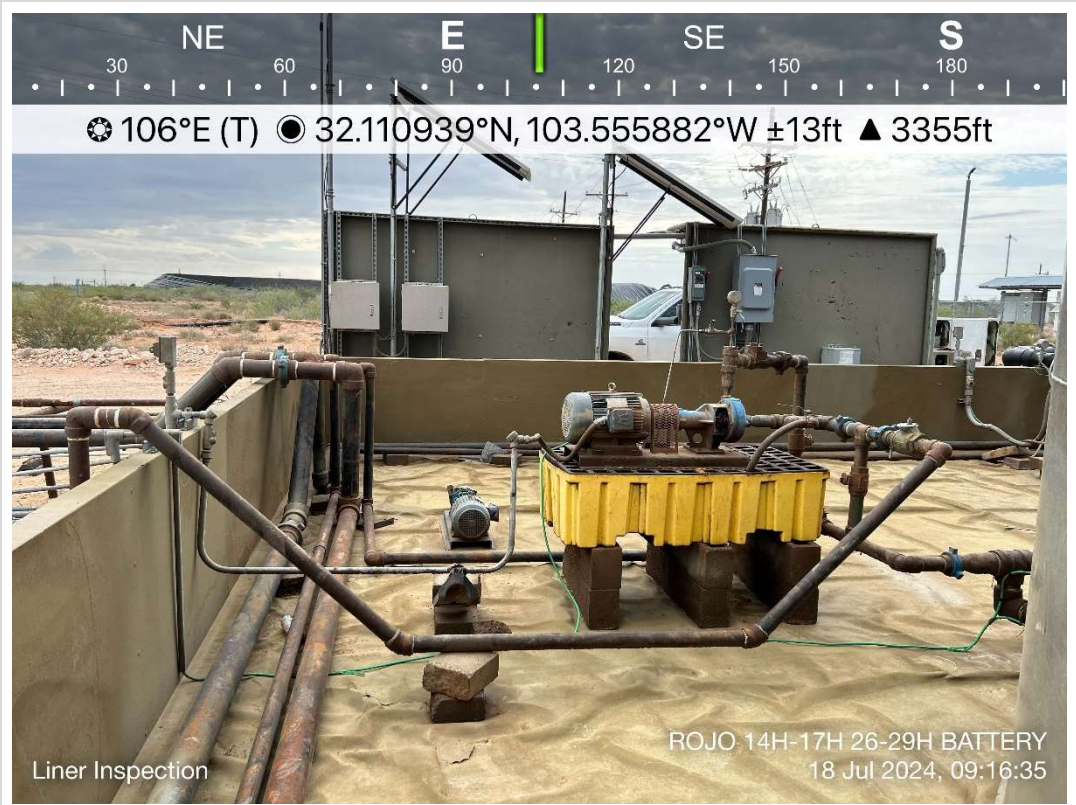
TETRA TECH, INC. PROJECT NO. 212C-MD-03556	DESCRIPTION	View north. Current lined containment area conditions; no rips, holes or tears observed.	3
	SITE NAME	ROJO 14H-17H, 26H-19H CTB	7/18/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03556	DESCRIPTION	View west. Current lined containment area conditions; no rips, holes or tears observed.	4
	SITE NAME	ROJO 14H-17H, 26H-19H CTB	7/18/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03556	DESCRIPTION	View northwest. Current lined containment area conditions; no rips, holes or tears observed.	5
	SITE NAME	ROJO 14H-17H, 26H-19H CTB	7/18/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03556	DESCRIPTION	View east. Current lined containment area conditions; no rips, holes or tears observed.	6
	SITE NAME	ROJO 14H-17H, 26H-19H CTB	7/18/2024

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

QUESTIONS

Action 369104

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 369104
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2418357364
Incident Name	NAPP2418357364 ROJO 14H-17H 26-29H BATTERY RELEASE @ 0
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2130123218] Rojo 14 - 17

Location of Release Source	
Please answer all the questions in this group.	
Site Name	Rojo 14H-17H 26-29H Battery Release
Date Release Discovered	06/30/2024
Surface Owner	Private

Incident Details	
Please answer all the questions in this group.	
Incident Type	Produced Water Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Human Error Separator Produced Water Released: 90 BBL Recovered: 90 BBL Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	A manway on the back of one of the storage tanks was not fully bolted on as the tank was out of service from a recent repair and the tank was not locked/tagged out resulting in the release of produced water into the lined secondary containment for the tank battery. The spill was fully captured within the lined containment which had undergone recent repairs. Initial response returned the full volume of released fluids to the storage tanks.

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

QUESTIONS, Page 2

Action 369104

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:	260297
	Action Number:	369104
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

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	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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.

I hereby agree and sign off to the above statement	Name: Chuck Terhune Title: Program Manager Email: chuck.terhune@tetrattech.com Date: 07/10/2024
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QUESTIONS, Page 3

Action 369104

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:	260297
	Action Number:	369104
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS**Site Characterization**

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). 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 in feet below ground surface (ft bgs)	Between 75 and 100 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Greater than 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between 1000 (ft.) and ½ (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1 and 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	06/30/2024
On what date will (or did) the final sampling or liner inspection occur	07/18/2024
On what date will (or was) the remediation complete(d)	06/30/2024
What is the estimated surface area (in square feet) that will be remediated	7000
What is the estimated volume (in cubic yards) that will be remediated	3000
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 4

Action 369104

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 369104
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS**Remediation Plan (continued)**

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:

(Select all answers below that apply.)

Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	Not answered.

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.

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.

I hereby agree and sign off to the above statement	Name: Chuck Terhune Title: Program Manager Email: chuck.terhune@tetrattech.com Date: 07/31/2024
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The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 6

Action 369104

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:	260297
	Action Number:	369104
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	364140
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	07/18/2024
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	7000

Remediation Closure Request

Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.

Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	3000
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	Lined secondary containment where released water contacted and accumulated was power washed and wash water was disposed of to the produced water storage tanks at the battery.

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 (in .pdf format) 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.

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.

I hereby agree and sign off to the above statement	Name: Chuck Terhune Title: Program Manager Email: chuck.terhune@tetrattech.com Date: 07/31/2024
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CONDITIONS

Action 369104

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 369104
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	App ID 369104 Liner Inspection approved	8/5/2024