



December 2, 2024

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

**Re: Release Characterization and Closure Request
BTA Oil Producers, LLC
Grama 8817 16-9 Fed Com #5H Tank Battery Release
Unit Letter M, Section 16, Township 22 South, Range 34 East
Lea County, New Mexico
Incident ID# nRM2014056076**

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by BTA Oil Producers, LLC (BTA) to assess a legacy release that occurred at the Grama 8817 JV-P Tank Battery. The release is located in Public Land Survey System (PLSS) Unit Letter M, Section 16, Township 22 South, Range 34 East, in Lea County, New Mexico (Site). The approximate release point occurred at coordinates 32.386018°, -103.481835°, as shown on Figures 1 and 2.

BACKGROUND

According to the State of New Mexico Oil Conservation Division (NMOCD) C-141 Initial Report, the release occurred on May 15, 2020, when the body of a dump valve on the Grama #5H separator washed out. Approximately two hundred and sixty (260) barrels (bbls) of fluid was released. The volume was determined by measurement of the fluid recovered via vacuum truck. The release was fully contained within the secondary lined containment of the tank battery. The approximate release extent is shown on Figure 3. The NMOCD approved the initial C-141 on May 18, 2020, and subsequently assigned the release the Incident ID nRM2014056076. The initial C-141 form is included in Appendix A.

INITIAL LINER INSPECTION AND CLOSURE REQUEST

Charger Environmental Services (Charger) conducted a liner integrity inspection on August 8, 2023. During the inspection, it was observed that no defects or abnormalities were present, that would compromise the integrity of the containments ability to retain fluids.

Charger prepared a Site Assessment Report, dated April 11, 2024, that summarized the liner inspection activities and requested closure of the incident. According to information provided by BTA, and corroborated by a review of NMOCD permitting, this application was rejected by the OCD the same day. A brief review of OCD permitting indicates that the application was rejected due to an incomplete C-141 submission:

"This application has been rejected because the C-141 is incomplete. The submitted application indicates a conflict between the questions answered and the attachments that have been submitted. For example the answer "No" was selected when requesting a remediation plan approval; however, your attachments indicate that your intent is to request a remediation closure

Tetra Tech

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report approval. Please review the December 1, 2023 Public Notice titled "Implementation of Digital C-141 and New Incident Statuses" found on the EMNRD website. Review your C-141 submission and submit a new C-141 answering the appropriate questions for your circumstance." Upon further review, it appears that this Charger report (as written) would inevitably be rejected regardless. The liner does not appear to have been power washed, and required language regarding the liner as able to contain the leak in question (no rips, tears, or holes), and remaining intact are not included. Additionally, the two business days' notice via the portal was not given to the OCD (C-141L) to conduct the liner inspection.

A copy of the Site Assessment Report is available in the NMOCD online incident files.

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)	Between 50 and 100 feet
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>	
A continuously flowing watercourse or any other significant watercourse	> 5 miles
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	> 5 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	> 5 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	Between 1/2 mile and 1 mile
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 groundwater well record within ½ mile (800 meters) of the Site with available water level data, CP 01963.

The well was completed to a depth of 60 feet and the well log indicates that the boring was a dry hole. The site characterization data are presented in Appendix B.

REGULATORY FRAMEWORK

Based upon the release footprint location 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 site characterization, depth to groundwater, and in accordance with Table I of 19.15.29.12 NMAC, the recommended remedial action levels (RRALs) for the Site are as follows:

Constituent	Site RRALs
Chloride	10,000 mg/kg
TPH (GRO+DRO+ORO)	2,500 mg/kg
TPH (GRO+DRO)	1,000 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

Additionally, in accordance with the NMOCD guidance *Procedures for Implementation of the Spill Rule (19.15.29 NMAC)* (September 6, 2019), the following reclamation requirements for surface soils (0-4 ft bgs) outside of active oil and gas operations are as follows:

Constituent	Reclamation Requirements
Chloride	600 mg/kg
TPH	100 mg/kg

2024 LINER INSPECTION AND DESKTOP REVIEW ACTIVITIES

The regulatory framework is 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 the affected material is removed, expose the affected area of the liner, 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
- Notification to the appropriate division district office at least two business days before conducting the liner inspection.

Prior to the liner inspection and in accordance with 19.15.29.11(A)(5)(a) NMAC, notification of a liner inspection at the Grama 8817 16-9 Fed Com #5H Tank battery was submitted via the NMOCD portal on September 26, 2024. The liner inspection notification is included in Appendix C.

On October 2, 2024, Tetra Tech personnel visited the site to perform an inspection of the liner within the containment area of the Grama 8817 16-9 Fed Com #5H Tank battery. This work was scheduled to verify the integrity of the liner. Upon arrival at the site, it was discovered that the Grama 8817 16-9 Fed Com #5H Tank Battery was not located at the GPS as indicated in the C-141.

During a desktop review of the incident, Tetra Tech discovered the GPS location in the C-141 corresponded to the Grama 8817 16 9 Federal #005H well (API 30-025-43871), and that the Grama 8817 JV-P Tank Battery was located approximately 0.84 miles to the west. Photographs documentation by Charger appear to correspond to this identified tank battery. Further, the Grama 8817 JV-P Tank Battery appears to have

Release Characterization and Closure Request
December 2, 2024

BTA Oil Producers, LLC

been reclaimed sometime between December 2023 and June 2024. Tetra Tech personnel verified the coordinates of the Grama 8817 JV-P Tank Battery at approximately 32.386018°, -103.481835°. As mentioned, these coordinates differ from what is found in the NMOCD imaging files.

CONFIRMATION SITE ASSESSMENT AND SAMPLING RESULTS

Following verification of the Grama 8817 JV-P Tank Battery, Tetra Tech conducted confirmation assessment sampling at the Site on behalf of BTA in order to demonstrate liner integrity prior to the reclamation of the tank battery.

On October 29, 2024, BTA subcontractor excavated eighteen (18) trenches (T-1 through T-18) to 1-foot bgs. Trench Location T-8 (approximate center of former battery) was further excavated an additional 3 feet (total 4 feet) to confirm soil concentration levels meet reclamation limits and applicable Site RRALs. No visible evidence of the release was observed during the 2024 sampling event. Photographic documentation of the release Site is presented in Appendix D.

A total of nineteen (19) soil samples were collected from the 18 trenches and sent to Cardinal Laboratories in Hobbs, New Mexico to be analyzed for chloride via EPA Method 300.0, TPH via EPA Method 8015M, and BTEX via EPA Method 8261B. A copy of the laboratory analytical report and chain-of-custody documentation are included in Appendix E. Analytical results from the 2024 confirmation assessment activities are summarized in Table 1. All analytical results were below reclamation limits and applicable Site RRALs.

CONCLUSION

Prior to the reclamation, the battery was observed to have no defects or abnormalities that would compromise the integrity of the containments ability to retain fluids. Additionally, all analytical results associated with 2024 confirmation assessment results were below the reclamation limits and applicable Site RRALs; therefore, no remediation of the release footprint is necessary. Based on the above, BTA respectfully requests closure for this release. If you have any questions concerning the confirmation sampling activities for the Site, please call me at (512) 560-9064.

Sincerely,
Tetra Tech, Inc.



Nicholas Poole, G.I.T.
Project Manager



Christian M. Llull, P.G.
Senior Project Manager

cc:
Mr. Ray Ramos – BTA Oil Producers, LLC

Release Characterization and Closure Request
December 2, 2024

BTA Oil Producers, LLC

LIST OF ATTACHMENTS

Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Approximate Release Area Map (2023)
- Figure 4 – Confirmation Assessment Map

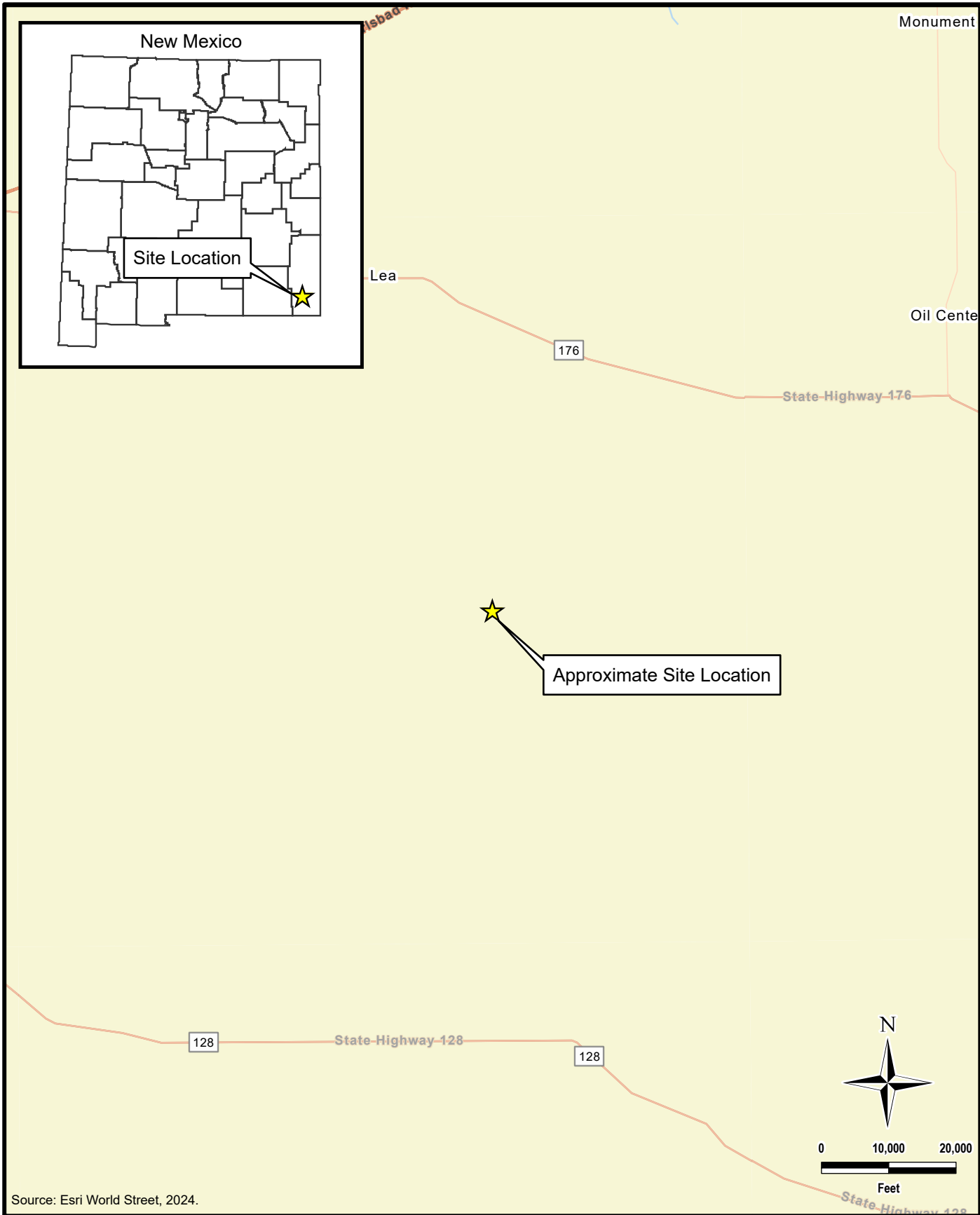
Tables:

- Table 1 – Summary of Analytical Results – 2024 Confirmation Soil Assessment

Appendices:

- Appendix A – C-141 Forms
- Appendix B – Site Characterization Data
- Appendix C – NMOCD Correspondence
- Appendix D – Photographic Documentation
- Appendix E – Laboratory Analytical Data

FIGURES



Source: Esri World Street, 2024.



TETRA TECH

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Midland, Texas 79701
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Fax: (432) 682-3946

BTA OIL PRODUCERS, LLC

NRM2014056076
(32.353194°, -103.452901°)
LEA COUNTY, NEW MEXICO

**GRAMA 8817 16-9 FED COM #5H TANK BATTERY
OVERVIEW MAP**

PROJECT NO.: 212C-MD-03604

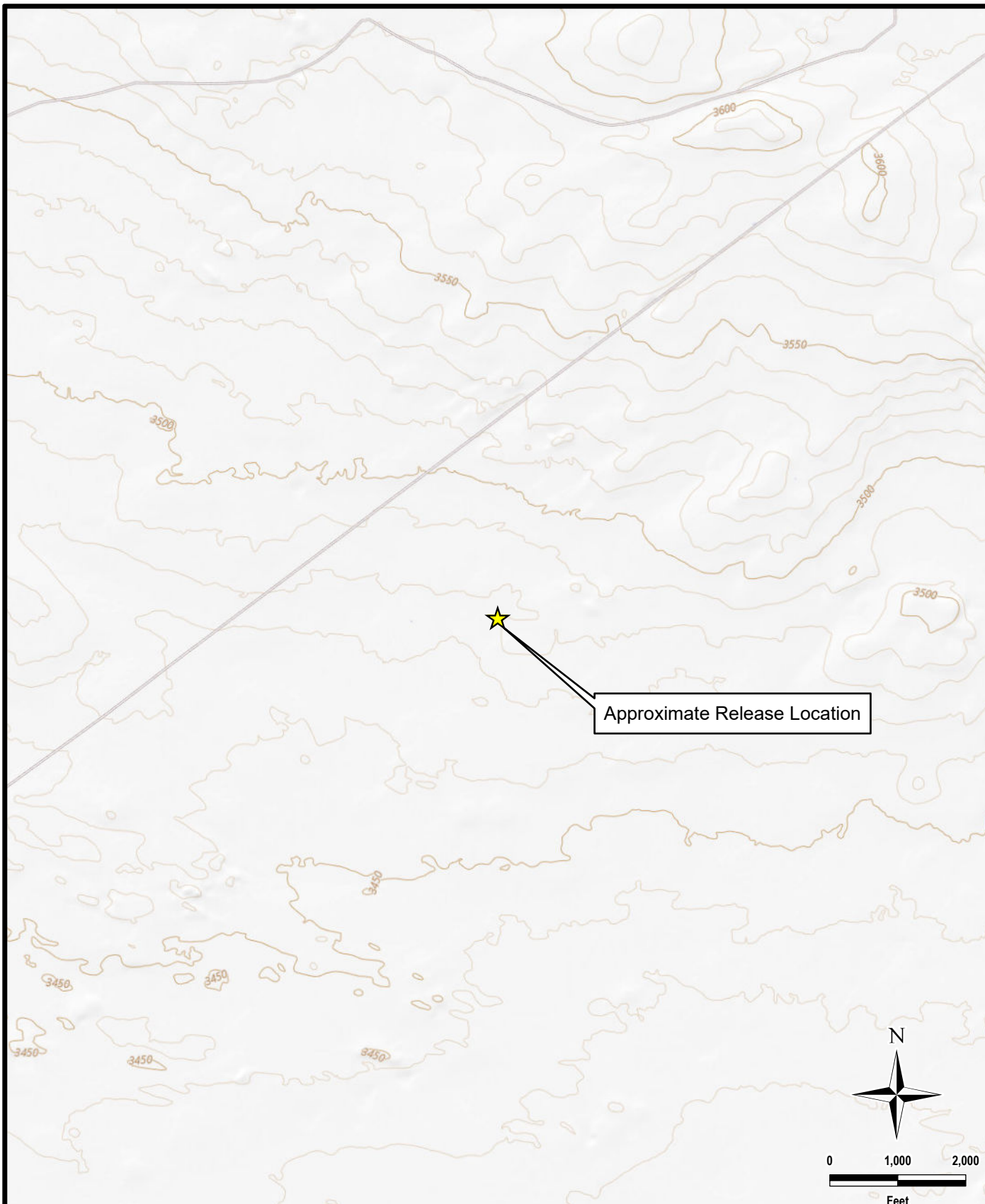
DATE: NOVEMBER 18, 2024

DESIGNED BY: LMV

Figure No.

1

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Source: Esri USGS Topo.



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NRM2014056076
(32.353194°, -103.452901°)
LEA COUNTY, NEW MEXICO

**GRAMA 8817 16-9 FED COM #5H TANK BATTERY
TOPOGRAPHIC MAP**

PROJECT NO.: 212C-MD-03604

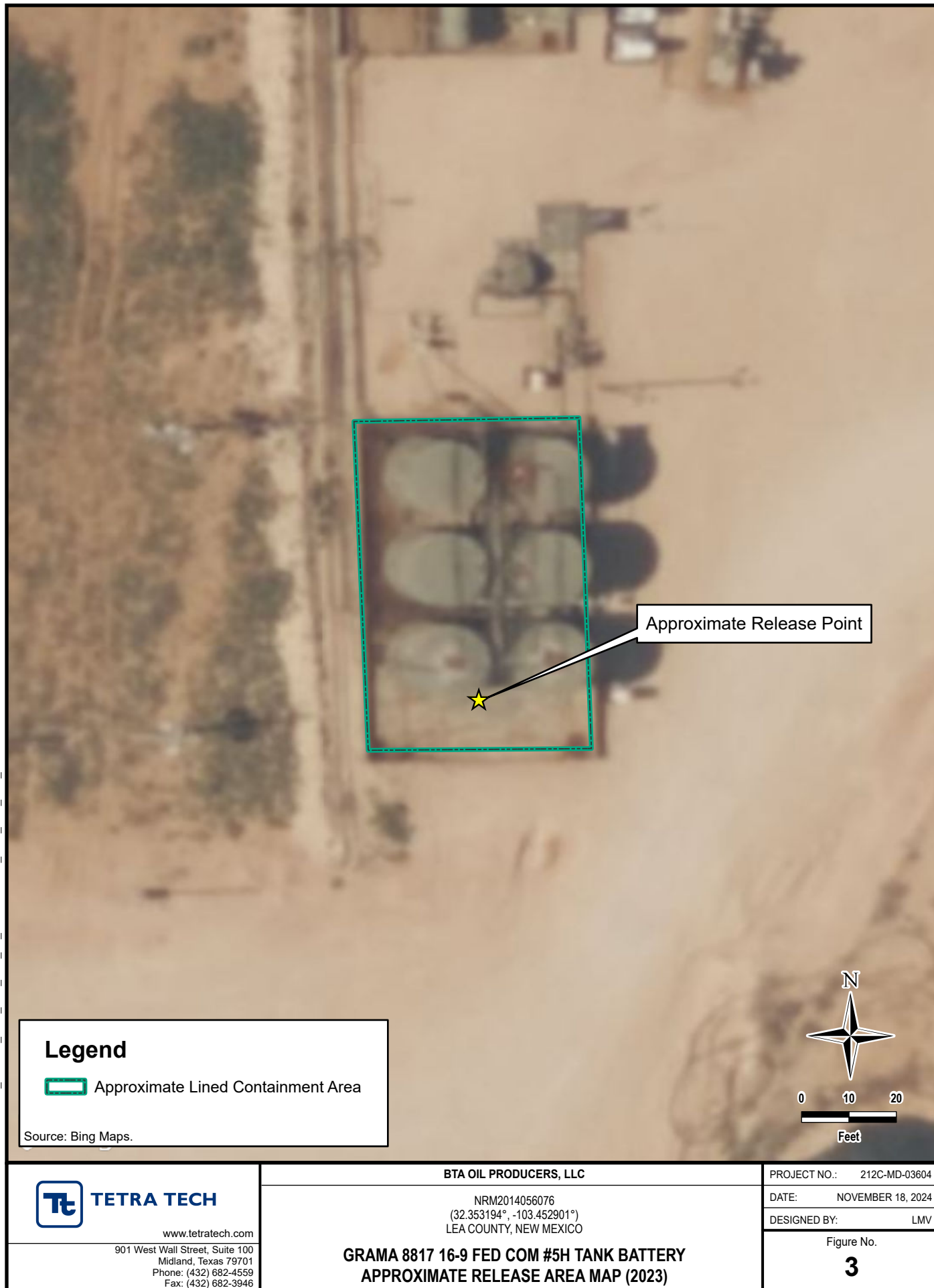
DATE: NOVEMBER 18, 2024

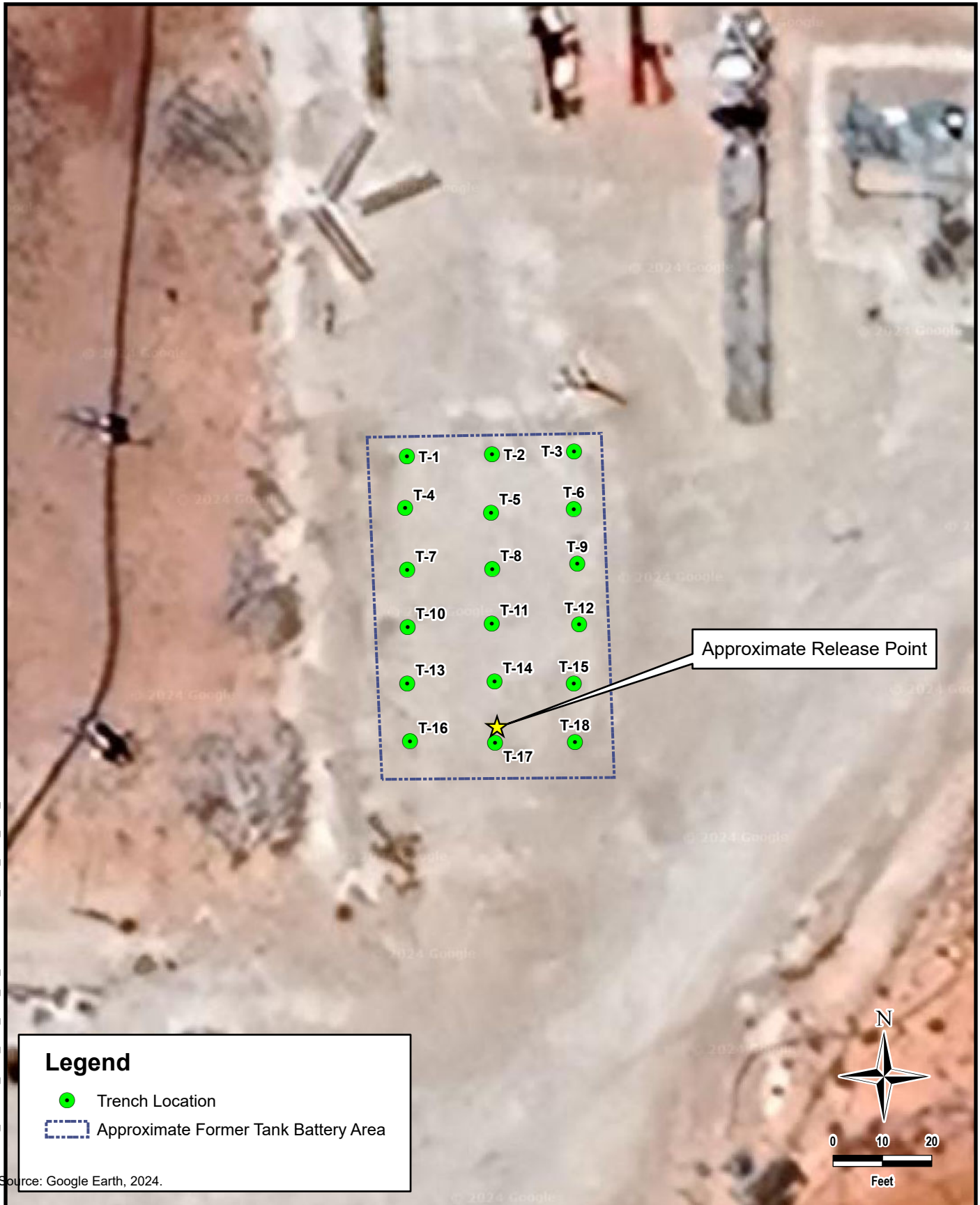
DESIGNED BY: LMV

Figure No.

2

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DOCUMENT PATH: Y:\BTA\212-MD-03604_GRAMA_8817_16-9_FED_5H_TANK\GRAMA_8817_16-9_FED_5H.APRX



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BTA OIL PRODUCERS, LLC

NRM2014056076
(32.353194°, -103.452901°)
LEA COUNTY, NEW MEXICO

**GRAMA 8817 16-9 FED COM #5H TANK BATTERY
CONFIRMATION ASSESSMENT MAP**

PROJECT NO.: 212C-MD-03604

DATE: NOVEMBER 18, 2024

DESIGNED BY: LMV

Figure No.

4

TABLES

TABLE 1
SUMMARY OF ANALYTICAL RESULTS
SOIL CONFIRMATION - nRM2014056076
BTA OIL PRODUCERS, LLC
GRAMA 8817 16-9 FED COM #5H
LEA COUNTY, NM

Sample ID	Sample Date	Sample Depth	Field Screening Results	Chloride ¹		TPH ³							
			Chloride			GRO		DRO		EXT DRO		Total TPH (GRO+DRO+EXT DRO)	
				mg/kg	Q	C ₆ - C ₁₀		> C ₁₀ - C ₂₈		> C ₂₈ - C ₃₆		mg/kg	
		ft. bgs	ppm			mg/kg	Q	mg/kg	Q	mg/kg	Q		
T-1	10/29/2024	0-1	213	176		<10.0		<10.0		<10.0		-	
T-2	10/29/2024	0-1	119	64.0		<10.0		<10.0		<10.0		-	
T-3	10/29/2024	0-1	254	128		<10.0		<10.0		<10.0		-	
T-4	10/29/2024	0-1	187	112		<10.0		<10.0		<10.0		-	
T-5	10/29/2024	0-1	248	112		<10.0		<10.0		<10.0		-	
T-6	10/29/2024	0-1	519	352		<10.0		<10.0		<10.0		-	
T-7	10/29/2024	0-1	113	64.0		<10.0		<10.0		<10.0		-	
T-8	10/29/2024	0-1	45.5	16.0		<10.0		<10.0		<10.0		-	
		3-4	47.89	<16.0		<10.0		<10.0		<10.0		-	
T-9	10/29/2024	0-1	118	48.0		<10.0		<10.0		<10.0		-	
T-10	10/29/2024	0-1	143	64.0		<10.0		<10.0		<10.0		-	
T-11	10/29/2024	0-1	135	64.0		<10.0		<10.0		<10.0		-	
T-12	10/29/2024	0-1	129	48.0		<10.0		<10.0		<10.0		-	
T-13	10/29/2024	0-1	176	96.0		<10.0		<10.0		<10.0		-	
T-14	10/29/2024	0-1	123	48.0		<10.0		<10.0		<10.0		-	
T-15	10/29/2024	0-1	140	96.0		<10.0		<10.0		<10.0		-	
T-16	10/29/2024	0-1	141	48.0		<10.0		<10.0		<10.0		-	
T-17	10/29/2024	0-1	210	160		<10.0		<10.0		<10.0		-	
T-18	10/29/2024	0-1	182	64.0		<10.0		<10.0		<10.0		-	

NOTES:

ft. Feet

bgs Below ground surface

mg/kg Milligrams per kilogram

TPH Total Petroleum Hydrocarbons

GRO Gasoline range organics

DRO Diesel range organics

1 Method SM4500Cl-B

2 Method 8021B

3 Method 8015M

APPENDIX A C-141 Forms

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

Location of Release Source

Latitude: 32.38500° Longitude: -103.46748°

(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Grama 8817 16-9 Fed Com #5H Tank Battery	Site Type: Tank Battery
Date Release Discovered: 5/15/2020	API# (if applicable) Nearest well: Grama 8817 Fed Com #5H API #30-025-43871

Unit Letter	Section	Township	Range	County
P	16	22S	34E	Lea

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

Nature and Volume of Release

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

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 260 BBL	Volume Recovered (bbls) 260 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

The body of a dump valve on the Grama #5H separator washed out. A total of 260 BBL fluid was released into the secondary containment of the tank battery where this separator vessel sat.

The volume was determined by measurement of the volume of fluid recovered by vacuum truck. The entire release was contained inside of the secondary containment for the tank battery built for the production equipment.

Form C-141

State of New Mexico
Oil Conservation Division

Page 2

Incident ID	
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 spill volume was greater than 25 BBL, which the NMOCD Rules define as a major release.
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? No. I was notified of this release on 5/18/2020. The initial notification is provided by email distribution of the C-141 Initial Report and Response to NMOCD and BLM personnel overseeing the area.	

Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
If all the actions described above have <u>not</u> been undertaken, explain why:
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. Printed Name: Bob Hall Title: Environmental Manager Signature: <u>Bob Hall</u> Date: 5/18/2020 email: bhall@btaoil.com Telephone: 432-682-3753
<u>OCD Only</u> Received by: _____ Date: _____

APPENDIX B

Site Characterization Data



WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

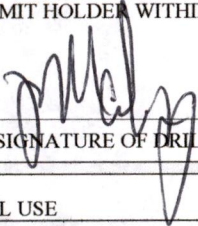
www.ose.state.nm.us

1. GENERAL AND WELL LOCATION	OSE POD NO. (WELL NO.) CP 01963		WELL TAG ID NO.		OSE FILE NO(S). CP-1963-POD1			
	WELL OWNER NAME(S) Devon Energy Resources				PHONE (OPTIONAL)			
	WELL OWNER MAILING ADDRESS 6488 7 Rivers Hwy				CITY Artesia	STATE NM	ZIP 88210	
	WELL LOCATION (FROM GPS)	DEGREES 32	MINUTES 23	SECONDS 6.79	* ACCURACY REQUIRED: ONE TENTH OF A SECOND			
	LATITUDE	LONGITUDE	* DATUM REQUIRED: WGS 84					
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS – PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE								
2. DRILLING & CASING INFORMATION	LICENSE NO. 1833		NAME OF LICENSED DRILLER Jason Maley			NAME OF WELL DRILLING COMPANY Vision Resources		
	DRILLING STARTED 3-25-24		DRILLING ENDED 3-25-24		DEPTH OF COMPLETED WELL (FT) 60'	BORE HOLE DEPTH (FT) 60'	DEPTH WATER FIRST ENCOUNTERED (FT) N/A	
	COMPLETED WELL IS: <input type="checkbox"/> ARTESIAN *add Centralizer info below <input checked="" type="checkbox"/> DRY HOLE <input type="checkbox"/> SHALLOW (UNCONFINED)					STATIC WATER LEVEL IN COMPLETED WELL (FT) 0'	DATE STATIC MEASURED 3-28-24	
	DRILLING FLUID: <input checked="" type="checkbox"/> AIR <input type="checkbox"/> MUD ADDITIVES – SPECIFY:							
	DRILLING METHOD: <input checked="" type="checkbox"/> ROTARY <input type="checkbox"/> HAMMER <input type="checkbox"/> CABLE TOOL <input type="checkbox"/> OTHER – SPECIFY:						CHECK HERE IF PITLESS ADAPTER IS INSTALLED <input type="checkbox"/>	
	DEPTH (feet bgl)		BORE HOLE DIAM (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)	CASING CONNECTION TYPE (add coupling diameter)	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)	SLOT SIZE (inches)
	FROM	TO						
	0	50	6"	PVC 2" SCH40	Thread	2"	SCH40	N/A
	50	60	6"	PVC 2" SCH40	Thread	2"	SCH40	.02
3. ANNULAR MATERIAL	DEPTH (feet bgl)		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE- RANGE BY INTERVAL <i>*(if using Centralizers for Artesian wells- indicate the spacing below)</i>	AMOUNT (cubic feet)	METHOD OF PLACEMENT		
	FROM	TO						
				None pulled and plugged				

FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 09/22/2022)

FILE NO. CP-01963	POD NO. 1	TRN NO. 745236
LOCATION 22S. 34E. 17. 434	WELL TAG ID NO.	PAGE 1 OF 2

DEPTH (feet bgl)			THICKNESS (feet)	COLOR AND TYPE OF MATERIAL ENCOUNTERED - INCLUDE WATER-BEARING CAVITIES OR FRACTURE ZONES (attach supplemental sheets to fully describe all units)	WATER BEARING? (YES / NO)	ESTIMATED YIELD FOR WATER-BEARING ZONES (gpm)
	FROM	TO				
0	10	10'	Brown sand with caliche	Y ✓ N		
10	30	20'	Tan fine sand with small rock	Y ✓ N		
30	60	30'	Tan fine sand	Y ✓ N		
				Y N		
				Y N		
				Y N		
				Y N		
				Y N		
				Y N		
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				Y N		
METHOD USED TO ESTIMATE YIELD OF WATER-BEARING STRATA: <input type="checkbox"/> PUMP <input type="checkbox"/> AIR LIFT <input type="checkbox"/> BAILER <input type="checkbox"/> OTHER – SPECIFY: Dry hole				TOTAL ESTIMATED WELL YIELD (gpm): 0		
5. TEST; RIG SUPERVISION	WELL TEST	TEST RESULTS - ATTACH A COPY OF DATA COLLECTED DURING WELL TESTING, INCLUDING DISCHARGE METHOD, START TIME, END TIME, AND A TABLE SHOWING DISCHARGE AND DRAWDOWN OVER THE TESTING PERIOD.				
	MISCELLANEOUS INFORMATION:					
	PRINT NAME(S) OF DRILL RIG SUPERVISOR(S) THAT PROVIDED ONSITE SUPERVISION OF WELL CONSTRUCTION OTHER THAN LICENSEE: Jason Maley					
6. SIGNATURE	THE UNDERSIGNED HEREBY CERTIFIES THAT, TO THE BEST OF HIS OR HER KNOWLEDGE AND BELIEF, THE FOREGOING IS A TRUE AND CORRECT RECORD OF THE ABOVE DESCRIBED HOLE AND THAT HE OR SHE WILL FILE THIS WELL RECORD WITH THE STATE ENGINEER AND THE PERMIT HOLDER WITHIN 30 DAYS AFTER COMPLETION OF WELL DRILLING: <div style="text-align: center;"> _____ SIGNATURE OF DRILLER / PRINT SIGNEE NAME</div> <div style="text-align: right;">4/11/24 _____ DATE</div>					
FOR OSE INTERNAL USE				WR-20 WELL RECORD & LOG (Version 09/22/2022)		
FILE NO. CP-01963		POD NO. 1		TRN NO. 745230		
LOCATION 22S. 34E. 17. 434			WELL TAG ID NO.		PAGE 2 OF 2	

Mike A. Hamman, P.E.
State Engineer



Roswell Office
1900 WEST SECOND STREET
ROSWELL, NM 88201

**STATE OF NEW MEXICO
OFFICE OF THE STATE ENGINEER**

Trn Nbr: 745230
File Nbr: CP 01963
Well File Nbr: CP 01963 POD1

Apr. 24, 2024

DALE WOODALL
DEVON ENERGY
6488 7 RIVERS HWY
ARTESIA, NM 88210

Greetings:

The above numbered permit was issued in your name on 03/30/2023.

The Well Record was received in this office on 04/17/2024, stating that it had been completed on 03/25/2024, and was a dry well. The well is to be plugged according to 19.27.4.30 NMAC.

Please note that another well can be drilled under this permit if the well is completed and the well log filed on or before 03/29/2024.

If you have any questions, please feel free to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "Rodolfo Chavez".

Rodolfo Chavez
(575) 622-6521

drywell

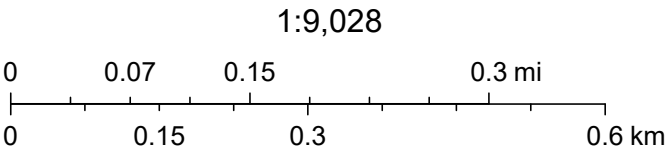
Permian Basin Karst Areas



11/14/2024, 2:58:15 PM

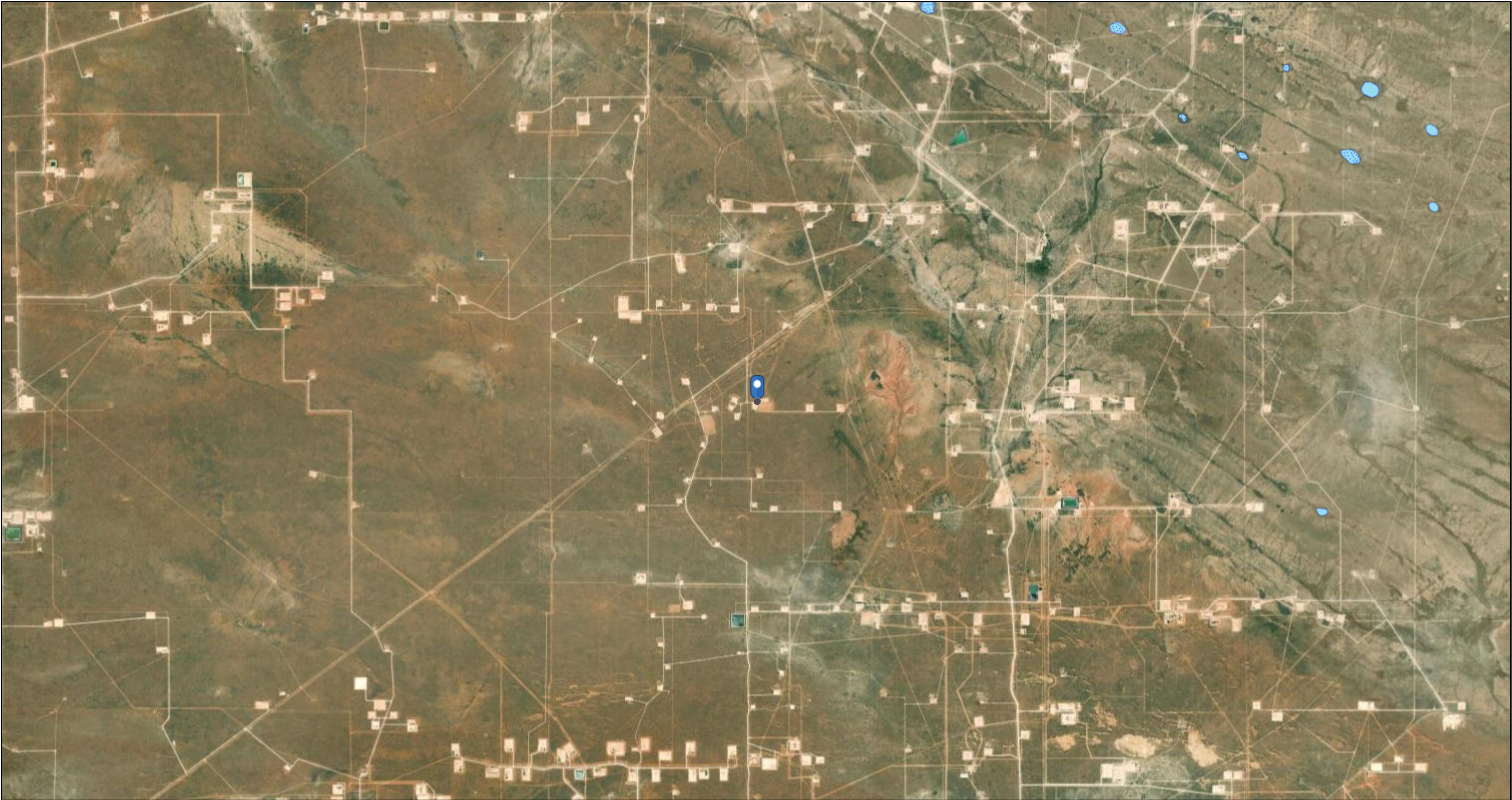
Karst Occurrence Potential

Low



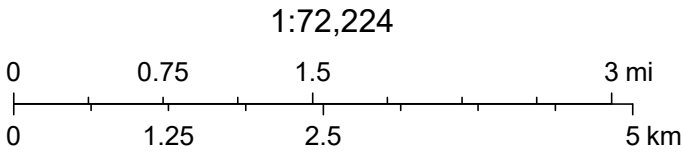
BLM, OCD, New Mexico Tech, Esri, HERE, Garmin, iPC, Maxar

Hydrology Map



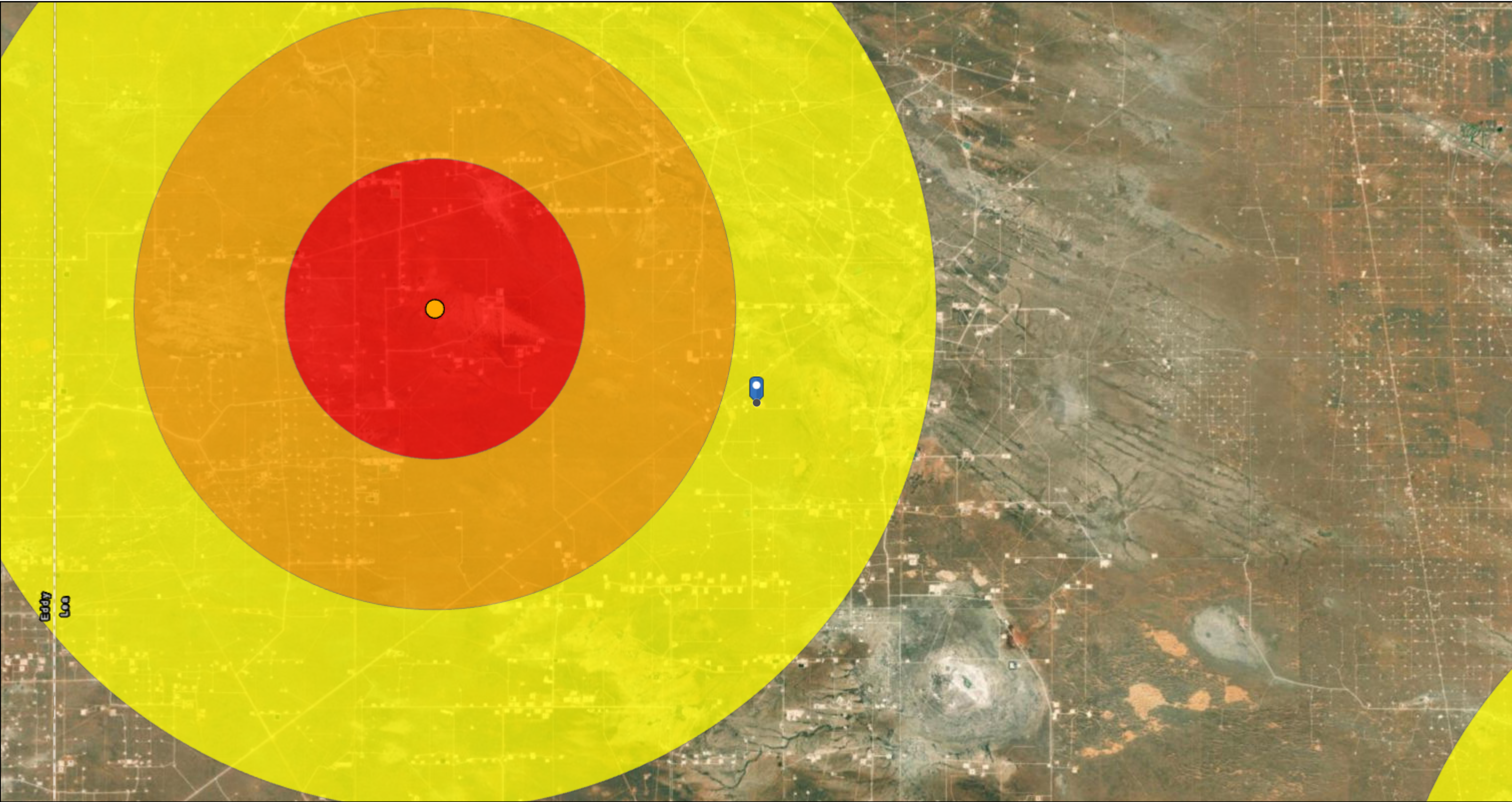
11/14/2024, 2:59:33 PM

- OSW Water Bodys
- OSE Probable Playas



Esri, HERE, Garmin, Earthstar Geographics, NM OSE

Induced Seismicity Area



11/14/2024, 3:02:11 PM

Seismic Response 3.0 to 3.4 M2.5+ Earthquakes (2021+)

3 mi. 6 mi. 10 mi. 3.0 - 3.4

1:144,448

0 1.5 3 6 mi

0 2.5 5 10 km

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

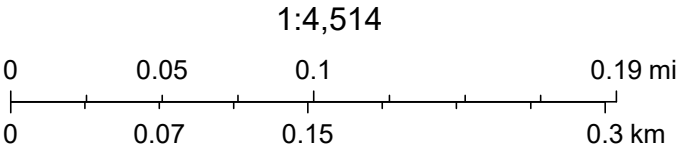
Land Ownership Map



11/14/2024, 3:01:14 PM

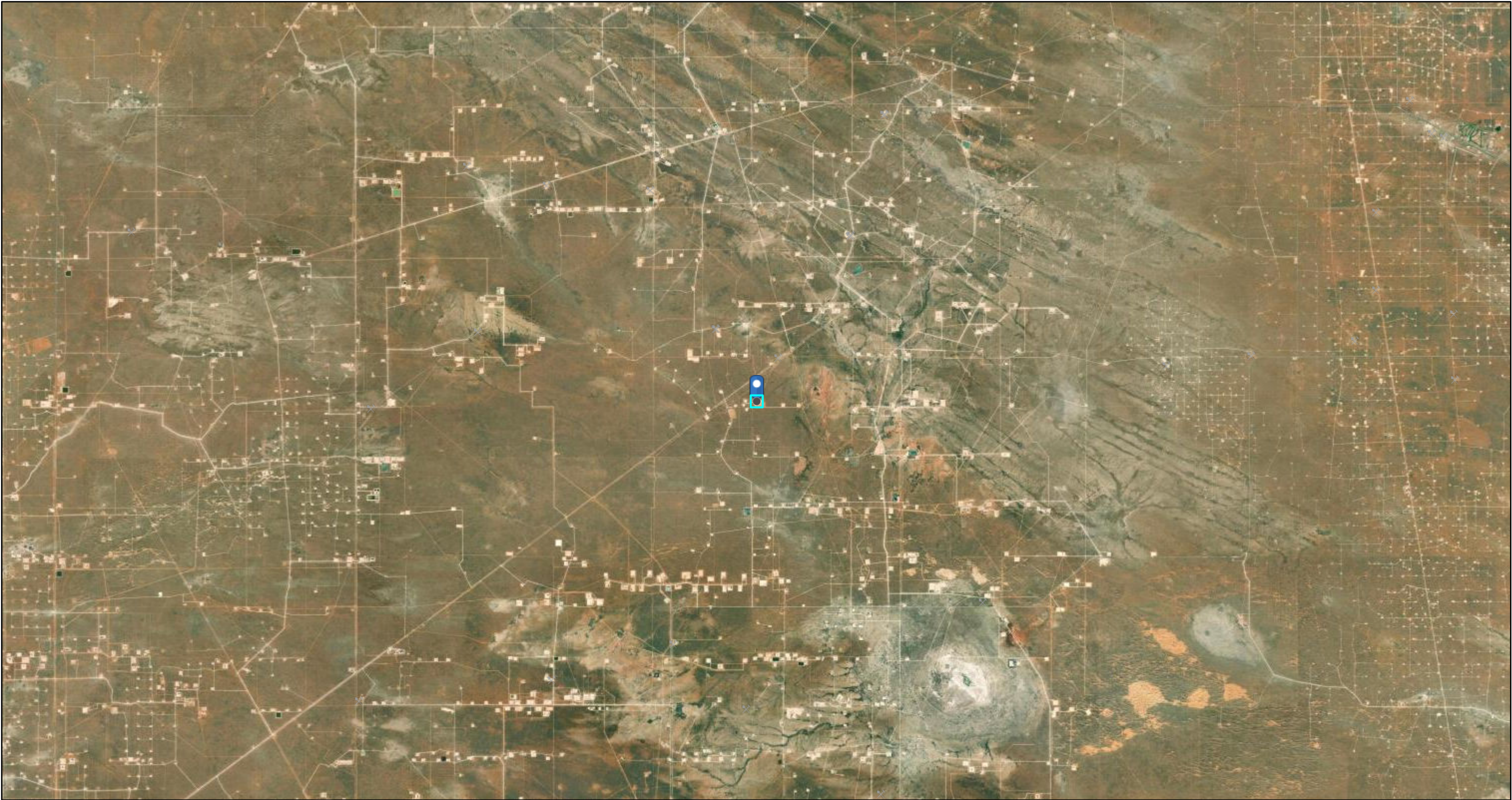
Land Ownership

- BLM
- S



U.S. BLM, Esri, HERE, Garmin, IPC, Maxar

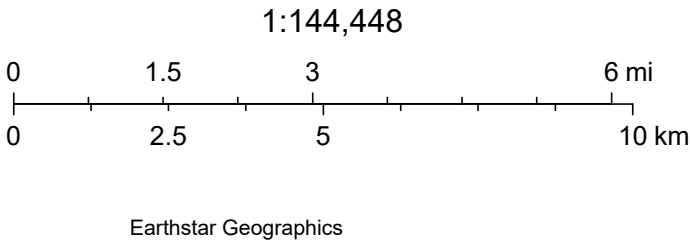
Active Mines in New Mexico



11/14/2024, 3:29:06 PM

Registered Mines

- ✕ Aggregate, Stone etc.
- ✕ Aggregate, Stone etc.
- ✕ Aggregate, Stone etc.



National Flood Hazard Layer FIRMette



103°29'13"W 32°23'25"N



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

1:6,000

103°28'36"W 32°22'54"N

Legend

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

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



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

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

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **11/14/2024 at 9:14 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.








National Wetlands Inventory Map






November 14, 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.

APPENDIX C

NMOCD Correspondence

Poole, Nicholas

From: OCDOnline@state.nm.us
Sent: Thursday, September 26, 2024 2:08 PM
To: Poole, Nicholas
Subject: The Oil Conservation Division (OCD) has accepted the application, Application ID: 387426

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

To whom it may concern (c/o Nicholas 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#) nRM2014056076.

The liner inspection is expected to take place:

When: 10/02/2024 @ 09:00

Where: P-16-22S-34E 0 FNL 0 FEL (32.38501,-103.46748)

Additional Information: Liner Inspection for Legacy Release.
32.385092°, -103.468049°

Additional Instructions: GRAMA 8817 16 9 FEDERAL #005H lease pad
GPS 32.385092°, -103.468049°

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

Poole, Nicholas

From: OCDOnline@state.nm.us
Sent: Wednesday, October 23, 2024 1:18 PM
To: Poole, Nicholas
Subject: The Oil Conservation Division (OCD) has accepted the application, Application ID: 395137

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

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

The OCD has received the submitted *Notification for (Final) Sampling of a Release (C-141N)*, for incident ID (n#) nRM2014056076.

The sampling event is expected to take place:

When: 10/28/2024 @ 13:00

Where: P-16-22S-34E 0 FNL 0 FEL (32.38501,-103.46748)

Additional Information: please contact nicholas poole @ (512)560-9064

Additional Instructions: Confirmation sampling will be completed such that each composite sample is representative of no more than 200 square feet of area. If sampling is not completed on Monday 10/28/24, sampling may continue into Tuesday 10/29/24.

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, sampling pursuant to 19.15.29.12.D NMAC is required. Sampling must be performed following an approved sampling plan or pursuant to 19.15.29.12.D.(1).(c) NMAC. 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 sampling events including any changes in date/time per the requirements of 19.15.29.12.D.(1).(a) NMAC, may result in the remediation closure samples 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



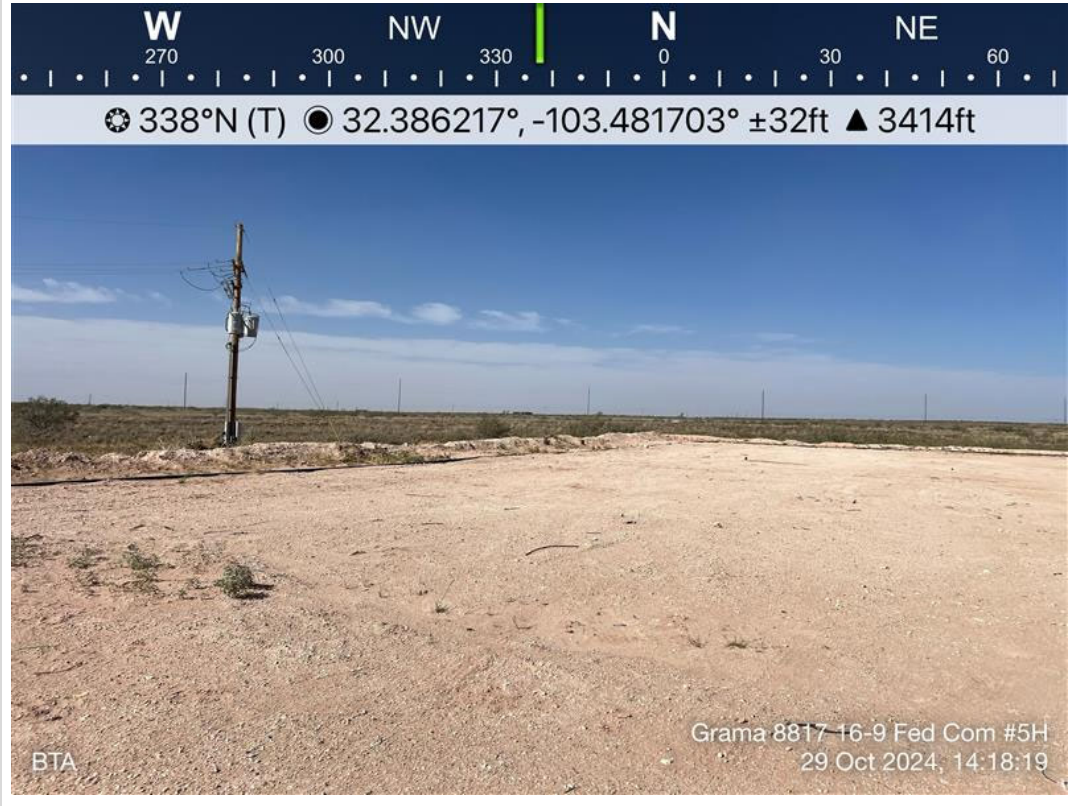
TETRA TECH, INC. PROJECT NO. 212C-MD-03604	DESCRIPTION	Site Signage and Location Information. Adjacent Grama Battery.	1
	SITE NAME	Grama 8817 16-9 Fed Com #5H Tank Battery	10/29/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03604	DESCRIPTION	View South. Pad area, no visible Surface staining.	2
	SITE NAME	Grama 8817 16-9 Fed Com #5H Tank Battery	10/29/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03604	DESCRIPTION	View west. Pad area, no visible Surface staining.	3
	SITE NAME	Grama 8817 16-9 Fed Com #5H Tank Battery	10/29/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03604	DESCRIPTION	View north northwest. Pad area, no visible Surface staining.	4
	SITE NAME	Grama 8817 16-9 Fed Com #5H Tank Battery	10/29/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03604	DESCRIPTION	View east southeast. Pad area, no visible Surface staining.	5
	SITE NAME	Grama 8817 16-9 Fed Com #5H Tank Battery	10/29/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03604	DESCRIPTION	View southeast. Pad area, no visible Surface staining.	6
	SITE NAME	Grama 8817 16-9 Fed Com #5H Tank Battery	10/29/2024

APPENDIX E

Laboratory Analytical Data



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

November 05, 2024

NICHOLAS POOLE

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: GRAMA 8817 16-9 FED COM #5H

Enclosed are the results of analyses for samples received by the laboratory on 10/30/24 8:44.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. 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:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	10/30/2024	Sampling Date:	10/29/2024
Reported:	11/05/2024	Sampling Type:	Soil
Project Name:	GRAMA 8817 16-9 FED COM #5H	Sampling Condition:	Cool & Intact
Project Number:	NRM2014056076	Sample Received By:	Shalyn Rodriguez
Project Location:	BTA - LEA COUNTY		

Sample ID: T - 1 (0-1') (H246598-01)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	11/01/2024	ND	416	104	400	7.41	
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	10/31/2024	ND	203	101	200	3.05	
DRO >C10-C28*	<10.0	10.0	10/31/2024	ND	203	102	200	7.63	
EXT DRO >C28-C36	<10.0	10.0	10/31/2024	ND					
Surrogate: 1-Chlorooctane	86.5 %	48.2-134							
Surrogate: 1-Chlorooctadecane	90.1 %	49.1-148							

Sample ID: T - 2 (0-1') (H246598-02)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	64.0	16.0	11/01/2024	ND	416	104	400	7.41		
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	10/31/2024	ND	203	101	200	3.05		
DRO >C10-C28*	<10.0	10.0	10/31/2024	ND	203	102	200	7.63		
EXT DRO >C28-C36	<10.0	10.0	10/31/2024	ND						
Surrogate: 1-Chlorooctane										
	96.8 %	48.2-134								
Surrogate: 1-Chlorooctadecane										
	99.1 %	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:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	10/30/2024	Sampling Date:	10/29/2024
Reported:	11/05/2024	Sampling Type:	Soil
Project Name:	GRAMA 8817 16-9 FED COM #5H	Sampling Condition:	Cool & Intact
Project Number:	NRM2014056076	Sample Received By:	Shalyn Rodriguez
Project Location:	BTA - LEA COUNTY		

Sample ID: T - 3 (0-1') (H246598-03)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	128	16.0	11/01/2024	ND	416	104	400	7.41	
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	10/31/2024	ND	183	91.7	200	1.83	
DRO >C10-C28*	<10.0	10.0	10/31/2024	ND	174	86.8	200	6.65	
EXT DRO >C28-C36	<10.0	10.0	10/31/2024	ND					
Surrogate: 1-Chlorooctane	79.8 %	48.2-134							
Surrogate: 1-Chlorooctadecane	87.7 %	49.1-148							

Sample ID: T - 4 (0-1') (H246598-04)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	112	16.0	11/01/2024	ND	416	104	400	7.41		
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	10/31/2024	ND	183	91.7	200	1.83		
DRO >C10-C28*	<10.0	10.0	10/31/2024	ND	174	86.8	200	6.65		
EXT DRO >C28-C36	<10.0	10.0	10/31/2024	ND						
Surrogate: 1-Chlorooctane	73.1 %	48.2-134								
Surrogate: 1-Chlorooctadecane	79.9 %	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:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	10/30/2024	Sampling Date:	10/29/2024
Reported:	11/05/2024	Sampling Type:	Soil
Project Name:	GRAMA 8817 16-9 FED COM #5H	Sampling Condition:	Cool & Intact
Project Number:	NRM2014056076	Sample Received By:	Shalyn Rodriguez
Project Location:	BTA - LEA COUNTY		

Sample ID: T - 5 (0-1') (H246598-05)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	11/01/2024	ND	416	104	400	7.41	
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	10/31/2024	ND	183	91.7	200	1.83	
DRO >C10-C28*	<10.0	10.0	10/31/2024	ND	174	86.8	200	6.65	
EXT DRO >C28-C36	<10.0	10.0	10/31/2024	ND					
Surrogate: 1-Chlorooctane	76.7 %	48.2-134							
Surrogate: 1-Chlorooctadecane	82.0 %	49.1-148							

Sample ID: T - 6 (0-1') (H246598-06)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	352	16.0	11/01/2024	ND	416	104	400	7.41		
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	10/31/2024	ND	183	91.7	200	1.83		
DRO >C10-C28*	<10.0	10.0	10/31/2024	ND	174	86.8	200	6.65		
EXT DRO >C28-C36	<10.0	10.0	10/31/2024	ND						
Surrogate: 1-Chlorooctane	83.4 %	48.2-134								
Surrogate: 1-Chlorooctadecane	90.5 %	49.1-148								

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	10/30/2024	Sampling Date:	10/29/2024
Reported:	11/05/2024	Sampling Type:	Soil
Project Name:	GRAMA 8817 16-9 FED COM #5H	Sampling Condition:	Cool & Intact
Project Number:	NRM2014056076	Sample Received By:	Shalyn Rodriguez
Project Location:	BTA - LEA COUNTY		

Sample ID: T - 7 (0-1') (H246598-07)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	64.0	16.0	11/01/2024	ND	416	104	400	7.41		
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	10/31/2024	ND	183	91.7	200	1.83		
DRO >C10-C28*	<10.0	10.0	10/31/2024	ND	174	86.8	200	6.65		
EXT DRO >C28-C36	<10.0	10.0	10/31/2024	ND						
Surrogate: 1-Chlorooctane	84.6 %	48.2-134								
Surrogate: 1-Chlorooctadecane	92.6 %	49.1-148								

Sample ID: T - 8 (0-1') (H246598-08)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	16.0	16.0	11/01/2024	ND	416	104	400	7.41		
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	10/31/2024	ND	183	91.7	200	1.83		
DRO >C10-C28*	<10.0	10.0	10/31/2024	ND	174	86.8	200	6.65		
EXT DRO >C28-C36	<10.0	10.0	10/31/2024	ND						
Surrogate: 1-Chlorooctane	80.7 %	48.2-134								
Surrogate: 1-Chlorooctadecane	87.5 %	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:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	10/30/2024	Sampling Date:	10/29/2024
Reported:	11/05/2024	Sampling Type:	Soil
Project Name:	GRAMA 8817 16-9 FED COM #5H	Sampling Condition:	Cool & Intact
Project Number:	NRM2014056076	Sample Received By:	Shalyn Rodriguez
Project Location:	BTA - LEA COUNTY		

Sample ID: T - 9 (0-1') (H246598-09)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	11/01/2024	ND	416	104	400	7.41	
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	10/31/2024	ND	183	91.7	200	1.83	
DRO >C10-C28*	<10.0	10.0	10/31/2024	ND	174	86.8	200	6.65	
EXT DRO >C28-C36	<10.0	10.0	10/31/2024	ND					
Surrogate: 1-Chlorooctane	78.8 %	48.2-134							
Surrogate: 1-Chlorooctadecane	85.5 %	49.1-148							

Sample ID: T - 10 (0-1') (H246598-10)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	64.0	16.0	11/01/2024	ND	416	104	400	7.41		
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	10/31/2024	ND	183	91.7	200	1.83		
DRO >C10-C28*	<10.0	10.0	10/31/2024	ND	174	86.8	200	6.65		
EXT DRO >C28-C36	<10.0	10.0	10/31/2024	ND						
Surrogate: 1-Chlorooctane	84.6 %	48.2-134								
Surrogate: 1-Chlorooctadecane	89.2 %	49.1-148								

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	10/30/2024	Sampling Date:	10/29/2024
Reported:	11/05/2024	Sampling Type:	Soil
Project Name:	GRAMA 8817 16-9 FED COM #5H	Sampling Condition:	Cool & Intact
Project Number:	NRM2014056076	Sample Received By:	Shalyn Rodriguez
Project Location:	BTA - LEA COUNTY		

Sample ID: T - 11 (0-1') (H246598-11)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	11/01/2024	ND	416	104	400	7.41	
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	10/31/2024	ND	183	91.7	200	1.83	
DRO >C10-C28*	<10.0	10.0	10/31/2024	ND	174	86.8	200	6.65	
EXT DRO >C28-C36	<10.0	10.0	10/31/2024	ND					
Surrogate: 1-Chlorooctane	89.3 %	48.2-134							
Surrogate: 1-Chlorooctadecane	95.8 %	49.1-148							

Sample ID: T - 12 (0-1') (H246598-12)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	11/01/2024	ND	416	104	400	7.41		
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	10/31/2024	ND	183	91.7	200	1.83		
DRO >C10-C28*	<10.0	10.0	10/31/2024	ND	174	86.8	200	6.65		
EXT DRO >C28-C36	<10.0	10.0	10/31/2024	ND						
Surrogate: 1-Chlorooctane	80.9 %	48.2-134								
Surrogate: 1-Chlorooctadecane	86.9 %	49.1-148								

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	10/30/2024	Sampling Date:	10/29/2024
Reported:	11/05/2024	Sampling Type:	Soil
Project Name:	GRAMA 8817 16-9 FED COM #5H	Sampling Condition:	Cool & Intact
Project Number:	NRM2014056076	Sample Received By:	Shalyn Rodriguez
Project Location:	BTA - LEA COUNTY		

Sample ID: T - 13 (0-1') (H246598-13)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	96.0	16.0	11/01/2024	ND	416	104	400	7.41		
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	10/31/2024	ND	183	91.7	200	1.83		
DRO >C10-C28*	<10.0	10.0	10/31/2024	ND	174	86.8	200	6.65		
EXT DRO >C28-C36	<10.0	10.0	10/31/2024	ND						
Surrogate: 1-Chlorooctane	75.5 %	48.2-134								
Surrogate: 1-Chlorooctadecane	80.5 %	49.1-148								

Sample ID: T - 14 (0-1') (H246598-14)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	11/01/2024	ND	416	104	400	7.41		
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	10/31/2024	ND	183	91.7	200	1.83		
DRO >C10-C28*	<10.0	10.0	10/31/2024	ND	174	86.8	200	6.65		
EXT DRO >C28-C36	<10.0	10.0	10/31/2024	ND						
Surrogate: 1-Chlorooctane	81.8 %	48.2-134								
Surrogate: 1-Chlorooctadecane	88.0 %	49.1-148								

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	10/30/2024	Sampling Date:	10/29/2024
Reported:	11/05/2024	Sampling Type:	Soil
Project Name:	GRAMA 8817 16-9 FED COM #5H	Sampling Condition:	Cool & Intact
Project Number:	NRM2014056076	Sample Received By:	Shalyn Rodriguez
Project Location:	BTA - LEA COUNTY		

Sample ID: T - 15 (0-1') (H246598-15)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	11/03/2024	ND	416	104	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	10/31/2024	ND	183	91.7	200	1.83	
DRO >C10-C28*	<10.0	10.0	10/31/2024	ND	174	86.8	200	6.65	
EXT DRO >C28-C36	<10.0	10.0	10/31/2024	ND					
Surrogate: 1-Chlorooctane	75.2 %	48.2-134							
Surrogate: 1-Chlorooctadecane	79.7 %	49.1-148							

Sample ID: T - 16 (0-1') (H246598-16)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	11/03/2024	ND	416	104	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	10/31/2024	ND	183	91.7	200	1.83		
DRO >C10-C28*	<10.0	10.0	10/31/2024	ND	174	86.8	200	6.65		
EXT DRO >C28-C36	<10.0	10.0	10/31/2024	ND						
Surrogate: 1-Chlorooctane	86.6 %	48.2-134								
Surrogate: 1-Chlorooctadecane	93.2 %	49.1-148								

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	10/30/2024	Sampling Date:	10/29/2024
Reported:	11/05/2024	Sampling Type:	Soil
Project Name:	GRAMA 8817 16-9 FED COM #5H	Sampling Condition:	Cool & Intact
Project Number:	NRM2014056076	Sample Received By:	Shalyn Rodriguez
Project Location:	BTA - LEA COUNTY		

Sample ID: T - 17 (0-1') (H246598-17)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	160	16.0	11/03/2024	ND	416	104	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	10/31/2024	ND	183	91.7	200	1.83	
DRO >C10-C28*	<10.0	10.0	10/31/2024	ND	174	86.8	200	6.65	
EXT DRO >C28-C36	<10.0	10.0	10/31/2024	ND					
Surrogate: 1-Chlorooctane	78.7 %	48.2-134							
Surrogate: 1-Chlorooctadecane	84.9 %	49.1-148							

Sample ID: T - 18 (0-1') (H246598-18)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	64.0	16.0	11/03/2024	ND	416	104	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	10/31/2024	ND	183	91.7	200	1.83		
DRO >C10-C28*	<10.0	10.0	10/31/2024	ND	174	86.8	200	6.65		
EXT DRO >C28-C36	<10.0	10.0	10/31/2024	ND						
Surrogate: 1-Chlorooctane	85.1 %	48.2-134								
Surrogate: 1-Chlorooctadecane	91.0 %	49.1-148								

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	10/30/2024	Sampling Date:	10/29/2024
Reported:	11/05/2024	Sampling Type:	Soil
Project Name:	GRAMA 8817 16-9 FED COM #5H	Sampling Condition:	Cool & Intact
Project Number:	NRM2014056076	Sample Received By:	Shalyn Rodriguez
Project Location:	BTA - LEA COUNTY		

Sample ID: T - 8 (3-4') (H246598-19)

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	11/03/2024	ND	416	104	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	10/31/2024	ND	183	91.7	200	1.83	
DRO >C10-C28*	<10.0	10.0	10/31/2024	ND	174	86.8	200	6.65	
EXT DRO >C28-C36	<10.0	10.0	10/31/2024	ND					
Surrogate: 1-Chlorooctane	79.2 %	48.2-134							
Surrogate: 1-Chlorooctadecane	85.3 %	49.1-148							

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Notes and Definitions

- QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- ** Samples not received at proper temperature of 6°C or below.
- *** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
Samples reported on an as received basis (wet) unless otherwise noted on report

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

Caley 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

Company Name: <u>Alpha Tech</u>		P.O. #:		BILL TO																															
Project Manager: <u>Nicholas Poole</u>		Company: <u>ASTA</u>		ANALYSIS REQUEST																															
Address:		Attn: <u>Ray Powers</u>																																	
City:		Address:																																	
Phone #:		City:																																	
Fax #:		State:																																	
Project #:		Zip:																																	
Project Name: <u>Granite 8812 16-9 Faircom #54</u>		Phone #:																																	
Project Location: <u>Lee County</u>		Fax #:																																	
Sampler Name: <u>Arthur Sample</u>																																			
FOR LAB USE ONLY																																			
Lab I.D.		Sample I.D.		MATRIX		PRESERV.		SAMPLING																											
H34US98																																			
1		T-1 C 0-1		GROUNDWATER		WASTEWATER		SOIL		OIL		SLUDGE		OTHER:		ACID/BASE:		ICE / COOL		OTHER:		DATE		TIME											
2		T-2 C 0-1																				10/19		12:00											
3		T-3 C 0-1																				12:20													
4		T-4 C 0-1																				1:30													
5		T-5 C 0-1																				1:10													
6		T-6 C 0-1																				1:20													
7		T-7 C 0-1																				1:40													
8		T-8 C 0-1																				2:10													
9		T-9 C 0-1																				2:30													
10		T-10 C 0-1																				2:50													
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Relinquished By: <u>Arthur Sample</u>		Date: <u>10/13/12</u>		Received By: <u>Stoddard</u>		Date: <u>10/13/12</u>		Time: <u>8:44</u>		Time: <u>1:20</u>		Time: <u>1:20</u>		Time: <u>1:20</u>		Time: <u>1:20</u>		Time: <u>1:20</u>		Time: <u>1:20</u>		Time: <u>1:20</u>		Time: <u>1:20</u>											
Relinquished By: <u>Arthur Sample</u>		Date: <u>10/13/12</u>		Received By: <u>Stoddard</u>		Date: <u>10/13/12</u>		Time: <u>8:44</u>		Time: <u>1:20</u>		Time: <u>1:20</u>		Time: <u>1:20</u>		Time: <u>1:20</u>		Time: <u>1:20</u>		Time: <u>1:20</u>		Time: <u>1:20</u>		Time: <u>1:20</u>											
Delivered By: (Circle One)		Observed Temp. °C		Corrected Temp. °C		Sample Condition		CHECKED BY: (Initials)		Turnaround Time:		Standard		Bacteria (only)		Sample Condition		Observed Temp. °C		Corrected Temp. °C															
Sampler - UPS - Bus - Other:		1-8		1-8		Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/>		SRL		Thermometer ID #140		Rush <input checked="" type="checkbox"/>		Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/>		Observed Temp. °C		Corrected Temp. °C																	
						No <input type="checkbox"/> Yes <input type="checkbox"/>				Correction Factor -0.5°C				No <input type="checkbox"/> Yes <input type="checkbox"/>																					



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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

2 of 2

Company Name: <i>Take Tech</i>		P.O. #:		BILL TO				ANALYSIS REQUEST																									
Project Manager: <i>Nicholas Poole</i>		Company: <i>PTA</i>																															
Address:		Attn: <i>Ray Ramos</i>																															
City:		Address:																															
State:		City:																															
Zip:		State:																															
Phone #:		Fax #:																															
Project #: <i>16M214056036</i>		Project Owner:																															
Project Name: <i>San Juan 8817 16-9 Rd San Juan SH</i>		City:																															
Project Location: <i>San Juan</i>		State:																															
Sample Name: <i>Waters Sanchez</i>		Phone #:																															
Fax #:																																	
FOR LAB USE ONLY																																	
Lab I.D.		Sample I.D.		(G)RAB OR (C)OMP.		# CONTAINERS		GROUNDWATER		WASTEWATER		SOIL		OIL		SLUDGE		OTHER :		ACID/BASE:		ICE / COOL		OTHER :		DATE		TIME		TPHC DRO / GRO / ORG		Chloride 4500	
11		T-11 (C-1)																								10-24		3:00					
12		T-12 (C-1)																								3:05							
13		T-13 (C-1)																								2:15							
14		T-14 (C-1)																								3:30							
15		T-15 (C-1)																								3:35							
16		T-16 (C-1)																								3:40							
17		T-17 (C-1)																								3:45							
18		T-18 (C-1)																								3:50							
19		T-19 (C-1)																								4:00							

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 the client for the analysis. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 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 services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By:	Date: <i>10/24/24</i>	Received By:	Verbal Result: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Add'l Phone #:
Relinquished By: <i>Waters Sanchez</i>	Time: <i>0844</i>	Received By: <i>Goodknight</i>	All Results are emailed. Please provide Email address:
Date:			
Time:			

Delivered By: (Circle One)	Observed Temp. °C	Sample Condition	CHECKED BY: (Initials)	Turnaround Time:	Standard	Bacteria (only)	Sample Condition
Sampler - UPS - Bus - Other:	Corrected Temp. °C	Cool <input type="checkbox"/> Intact <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>	<i>872</i>	Thermometer ID #140	<input checked="" type="checkbox"/> Rush	<input type="checkbox"/> Cool <input type="checkbox"/> Intact <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>	Observed Temp. °C
	<i>1.2</i>			Correction Factor -0.6°C			Corrected Temp. °C

FORM-006 R-3-3 06/05/24

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

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

QUESTIONS

Action 407864

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 407864
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nRM2014056076
Incident Name	NRM2014056076 GRAMA 8817 16-9 FED COM #SH TANK BATTERY @ 30-025-43871
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Well	[30-025-43871] GRAMA 8817 16 9 FEDERAL #005H

Location of Release Source*Please answer all the questions in this group.*

Site Name	GRAMA 8817 16-9 FED COM #SH TANK BATTERY
Date Release Discovered	05/15/2020
Surface Owner	State

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: Equipment Failure Dump Valve Produced Water Released: 260 BBL Recovered: 260 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)	According to the State of New Mexico Oil Conservation Division (NMOCD) C-141 Initial Report, the release occurred on May 15, 2020, when the body of a dump valve on the Grama #5H separator washed out. Approximately two hundred and sixty (260) barrels (bbls) of fluid was released. The volume was determined by measurement of the fluid recovered via vacuum truck. The release was fully contained within the secondary lined containment of the tank battery. The approximate release extent is shown on Figure 3. The NMOCD approved the initial C-141 on May 18, 2020, and subsequently assigned the release the Incident ID nRM2014056076. The initial C-141 form is included in Appendix A.

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QUESTIONS, Page 2

Action 407864

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 407864
	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: Nicholas Poole Title: with Tetrattech Email: nicholas.poole@tetrattech.com Date: 12/03/2024
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QUESTIONS, Page 3

Action 407864

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:
	260297
	Action Number:
	407864
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 51 and 75 (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)	Greater than 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	Greater than 5 (mi.)
Any other fresh water well or spring	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between ½ and 1 (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
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.	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
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.	
On what estimated date will the remediation commence	10/29/2024
On what date will (or did) the final sampling or liner inspection occur	10/29/2024
On what date will (or was) the remediation complete(d)	10/29/2024
What is the estimated surface area (in square feet) that will be remediated	0
What is the estimated volume (in cubic yards) that will be remediated	0
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.	
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 4

Action 407864

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:
	260297
	Action Number:
	407864
	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)	
<i>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.</i>	
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	No
Is (or was) there a power wash of the lined containment area (to be) performed	No
OTHER (Non-listed remedial process)	Yes
Other Non-listed Remedial Process. Please specify	<p>On October 2, 2024, Tetra Tech personnel visited the site to perform an inspection of the liner within the containment area of the Grama 8817 16-9 Fed Com #5H Tank battery. This work was scheduled to verify the integrity of the liner. Upon arrival at the site, it was discovered that the Grama 8817 16-9 Fed Com #5H Tank Battery was not located at the GPS as indicated in the C-141. During a desktop review of the incident, Tetra Tech discovered the GPS location in the C-141 corresponded to the Grama 8817 16 9 Federal #005H well (API 30-025-43871), and that the Grama 8817 JV-P Tank Battery was located approximately 0.84 miles to the west. Photographs documentation by Charger appear to correspond to this identified tank battery. Further, the Grama 8817 JV-P Tank Battery appears to have been reclaimed sometime between December 2023 and June 2024. Tetra Tech personnel verified the coordinates of the Grama 8817 JV-P Tank Battery at approximately 32.386018°, -103.481835°. As mentioned, these coordinates differ from what is found in the NMOCID imaging files. Following verification of the Grama 8817 JV-P Tank Battery, Tetra Tech conducted confirmation assessment sampling at the Site on behalf of BTA in order to demonstrate liner integrity prior to the reclamation of the tank battery. On October 29, 2024, BTA subcontractor excavated eighteen (18) trenches (T-1 through T-18) to 1-foot bgs. Trench Location T-8 (approximate center of former battery) was further excavated an additional 3 feet (total 4 feet) to confirm soil concentration levels meet reclamation limits and applicable Site RRALs. No visible evidence of the release was observed during the 2024 sampling event. Photographic documentation of the release Site is presented in Appendix D. A total of nineteen (19) soil samples were collected from the 18 trenches and sent to Cardinal Laboratories. All analytical results were below reclamation limits and applicable Site RRALs.</p>
<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>	
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: Nicholas Poole Title: with Tetrattech Email: nicholas.poole@tetrattech.com Date: 12/03/2024
<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 6

Action 407864

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:
	260297
	Action Number:
	407864
Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	387426
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	10/02/2024
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	1400

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	0
What was the total volume (cubic yards) remediated	0

Summarize any additional remediation activities not included by answers (above)	Following verification of the Grama 8817 JV-P Tank Battery, Tetra Tech conducted confirmation assessment sampling at the Site on behalf of BTA in order to demonstrate liner integrity prior to the reclamation of the tank battery. On October 29, 2024, BTA subcontractor excavated eighteen (18) trenches (T-1 through T-18) to 1-foot bgs. Trench Location T-8 (approximate center of former battery) was further excavated an additional 3 feet (total 4 feet) to confirm soil concentration levels meet reclamation limits and applicable Site RRALs. No visible evidence of the release was observed during the 2024 sampling event. Photographic documentation of the release Site is presented in Appendix D. A total of nineteen (19) soil samples were collected from the 18 trenches and sent to Cardinal Laboratories. All analytical results were below reclamation limits and applicable Site RRALs.
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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: Nicholas Poole Title: with Tetrattech Email: nicholas.poole@tetrattech.com Date: 12/03/2024
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CONDITIONS

Action 407864

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 407864
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
nvez	Liner inspection approved, release resolved.	12/10/2024