



November 20, 2024

District Supervisor  
Oil Conservation Division, District 2  
506 W. Texas  
Artesia, New Mexico 88210

**Re: Closure Request  
J R Oil, Ltd. Co.  
State P CTB  
Unit Letter M, Section 32, Township 22 South, Range 38 East  
Lea County, New Mexico  
Incident ID# NOY1804740772  
(Former 1RP-4969)**

Sir or Madam,

Tetra Tech, Inc. (Tetra Tech) was contacted by J R Oil, Ltd. Co. (JR Oil) to evaluate a historical release associated with the Central Tank Battery (CTB). This historical release was initially associated with OXY USA WTP LIMITED PARTNERSHIP (Oxy), however, ownership of the well appears to have been transferred to J R Oil, Ltd. Co. on April 1, 2021. The release footprint is located in Public Land Survey System (PLSS) Unit Letter M, Section 32, Township 22 South, Range 38 East, in Lea County, New Mexico (Site). The approximate release location is shown on Figures 1 and 2.

## BACKGROUND

According to the State of New Mexico Oil Conservation Division (NMOCD) C-141 Initial Report, the release was discovered on February 7, 2018. The release occurred as a result of a tank overflow due to a lack of gauges. Approximately 10 barrels (bbls) of crude oil were released of which 8 bbls of crude oil were recovered. The release footprint was located within a lined facility and the entirety of the release remained within the lined facility. The approximate release extent is shown in Figure 3.

The NMOCD approved the initial C-141 on February 16, 2018, and subsequently assigned the release the Incident ID NOY1804740772 and the remediation permit (RP) number 1RP-4969. The initial C-141 form is included in Appendix A.

The facility name listed on the C-141 is the State P Central Tank Battery (CTB) and the coordinates listed on the C-141 for the release point (32.344721°, -103.088923°) correspond to a tank battery. The adjacent unrelated well State P #003 (API# 30-025-12181) is located southeast of the battery facility, but is noted on the C-141 as the "closest well".

An additional release incident (ID NCH1835251206) was located at the State P CTB. This incident (associated with the unrelated adjacent State P #003 well) footprint coincides with the subject line release incident footprint. Incident ID NCH1835251206, discovered subsequent to the subject line release on November 12, 2018, resulted in the release of 30 bbls of produced water, of which 25 bbls of produced water were recovered. The release took place within the same lined facility and did not leave the boundaries of the lined facility. A separate Closure Request for will be submitted for the coincident release.

Tetra Tech

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

Tel 432.682.4559 Fax 432.682.3946 www.tetrattech.com

Closure Request  
November 20, 2024

J R Oil, Ltd. Co.

**BBC REMEDIAL ACTION AND 2019 NCH1835251206 CLOSURE REPORT**

According to information provided by J R Oil to Tetra Tech, BBC International, Inc. (BBC) was contracted by the former operator (Oxy) to perform work associated with these 2018 releases (NOY1804740772 and NCH1835251206) at the State P CTB. From review of available files, following the November 2018 release, BBC was contracted to execute the remediation of incident NCH1835251206. The ensuing work presumably addressed the impacts associated with the prior release (NOY1804740772).

Based on available documentation, in January 2019, BBC executed the remediation by removing all contaminated material from within the lined facility. Thereafter, a liner inspection was performed to confirm the integrity of the facility’s liner. BBC drafted a Closure Report, dated January 25, 2019, documenting these remedial actions and liner inspection performed. The Closure Report is included as Appendix B. Photographic documentation of the exposed liner is included in the BBC Closure Report. According to the Closure Report and evidenced by the photographic documentation, the liner was found to be in good condition. Once the liner inspection was completed, the lined facility was backfilled with clean material.

**CONCLUSION**

Based on the age of the release and demonstrated remedial actions, J R Oil, Ltd. Co. respectfully requests closure for this incident. The release took place within a lined facility and remained within the confines of the facility. Remediation of the release extent took place in conjunction with the remedial action documented on incident NCH1835251206.

Inspection of the liner was conducted, with photographic documentation of the exposed liner. The remediation was completed to NMOCD standards of the period. A closure report was generated by BBC, with C-141 pages attached. In all likelihood, the report for incident NCH1835251206 was emailed to the NMOCD as per previous submittal standards, but not reviewed as the document was likely received during a transitional period to current NMOCD guidelines and online submittal process.

The final C-141 forms are enclosed in Appendix A. These C-141 forms are signed by the previous operator and were included in the original documentation provided by BBC. If you have any questions concerning the remedial activities for the Site, please call me at (509) 768-2191.

Sincerely,  
**Tetra Tech, Inc.**



Sam Chama, G.I.T  
Project Geologist



Christian M. Llull, P.G.  
Program Manager

Closure Request  
November 20, 2024

J R Oil, Ltd. Co.

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## LIST OF ATTACHMENTS

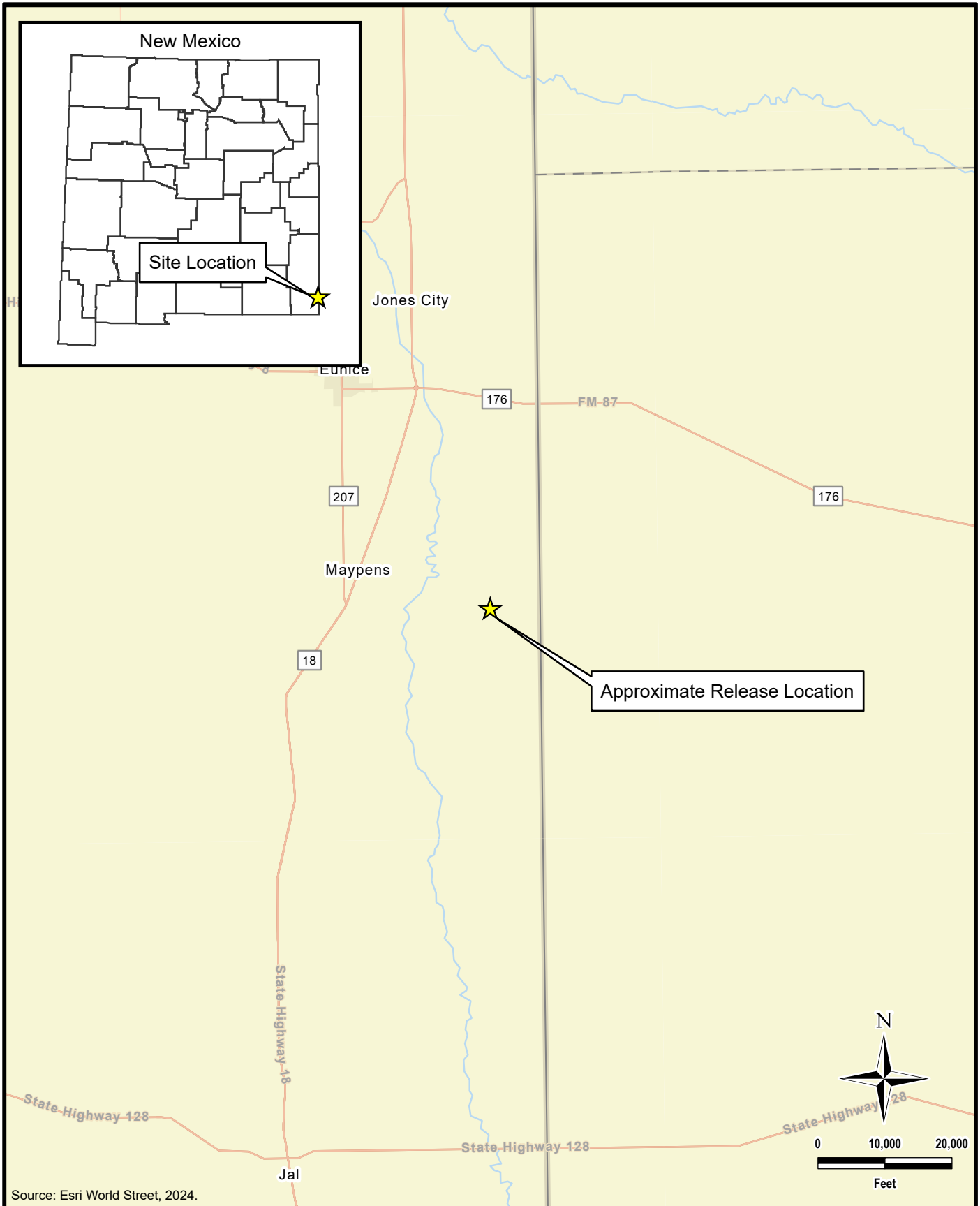
### Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Approximate Release Extent
- Figure 4 – Inferred Remediation Extents

### Appendices:


- Appendix A – C-141 Forms
- Appendix B – NCH1835251206 BBC Closure Report

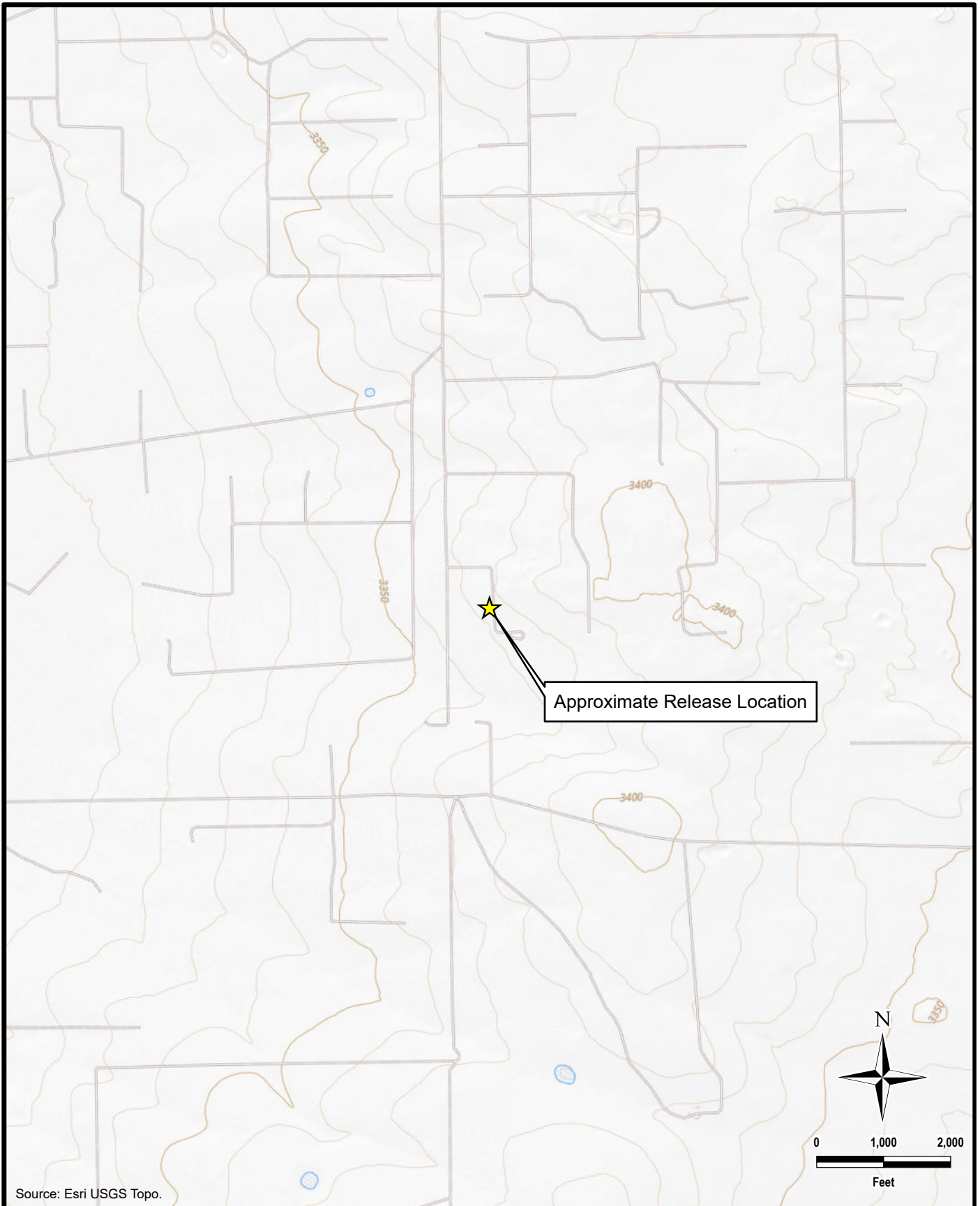
## **FIGURES**



Source: Esri World Street, 2024.


DOCUMENT PATH: Y:\JR\_OIL\212C-MD-03536\_STATE\_CTB\_P3\STATE\_CTB\_P3\_APPX

 <b>TETRA TECH</b> www.tetrattech.com 901 West Wall Street, Suite 100 Midland, Texas 79701 Phone: (432) 682-4559 Fax: (432) 682-3946	<b>JR OIL, LTD. CO.</b>  NOY1804740772 (32.344771°, -103.088926°) LEA COUNTY, NEW MEXICO	PROJECT NO.: 212C-MD-03536 DATE: NOVEMBER 18, 2024 DESIGNED BY: LMV
	<b>STATE P CTB (STATE P #003) OVERVIEW MAP</b>	Figure No. <b>1</b>







Source: Esri USGS Topo.

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 <b>TETRA TECH</b> www.tetrattech.com 901 West Wall Street, Suite 100 Midland, Texas 79701 Phone: (432) 682-4559 Fax: (432) 682-3946	<b>JR OIL, LTD. CO.</b> NOY1804740772 (32.344771°, -103.088926°) LEA COUNTY, NEW MEXICO	PROJECT NO.: 212C-MD-03536 DATE: NOVEMBER 18, 2024 DESIGNED BY: LMV
	<b>STATE P CTB (STATE P #003)</b> <b>TOPOGRAPHIC MAP</b>	Figure No. <b>2</b>



**Legend**

-  Approximate Release Extent
-  Facility Berm
-  Tank
-  Surface Line

Source: Google Earth, 2023.



DOCUMENT PATH: Y:\JR\_OIL\212C-MD-03536\_STATE\_CTB\_P3\STATE\_CTB\_P3\_APPX



**TETRA TECH**

www.tetrattech.com

901 West Wall Street, Suite 100  
Midland, Texas 79701  
Phone: (432) 682-4559  
Fax: (432) 682-3946

JR OIL, LTD. CO.

NOY1804740772  
(32.344771°, -103.088926°)  
LEA COUNTY, NEW MEXICO

**STATE P CTB (STATE P #003)  
APPROXIMATE RELEASE EXTENT**

PROJECT NO.: 212C-MD-03536

DATE: NOVEMBER 19, 2024






DESIGNED BY: LMV

Figure No.

**3**




**Legend**

-  Approximate Release Extent
-  Approximate Remedial Extent
-  Facility Berm
-  Tank
-  Surface Line

Source: Google Earth, 2023.



DOCUMENT PATH: Y:\JR\_OIL\212C-MD-03536\_STATE\_CTB\_P3\STATE\_CTB\_P3\_APPR

 <b>TETRA TECH</b> www.tetrattech.com 901 West Wall Street, Suite 100 Midland, Texas 79701 Phone: (432) 682-4559 Fax: (432) 682-3946	<b>JR OIL, LTD. CO.</b> NOY1804740772 (32.344771°, -103.088926°) LEA COUNTY, NEW MEXICO	PROJECT NO.: 212C-MD-03536 DATE: NOVEMBER 19, 2024 DESIGNED BY: LMV
	<b>STATE P CTB (STATE P #003)</b> <b>APPROXIMATE REMEDIATION EXTENT</b>	Figure No. <b>4</b>



# **APPENDIX A C-141 Forms**

Page 10 of 28  
Received by O.C.D.: 1/15/2025 12:26:58 PM  
Released to Imaging: 1/27/2025 3:46:57 PM

District I  
625 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

Form C-141  
Revised April 3, 2017

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

Submit 1 Copy to appropriate District Office in  
accordance with 19.15.29 NMAC.

Release Notification and Corrective Action Initial only

OPERATOR

Initial Report  Final Report

Name of Company	OXY USA WTP LP	Contact	WADE DITTRICH
Address	PO BOX 4294; HOUSTON, TX 77210	Telephone No.	575-390-2828
Facility Name	STATE P CTB	Facility Type	CTB

Surface Owner	<span style="border: 1px solid red; padding: 2px;">Fee</span>	Mineral Owner	STATE	API No.	30-025-12181-closest well
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<span style="border: 1px solid red; padding: 2px;">L/M</span>	32	22S	38E					LEA

Latitude 32.344721 \_ Longitude -103.088923 \_ NAD83

NATURE OF RELEASE + historic

Type of Release	OIL	Volume of Release	10 bbls	Volume Recovered	8 bbls
Source of Release	Lack of gauges caused tank to overflow	Date and Hour of Occurrence	2/7/2018	Date and Hour of Discovery	2/8/2018
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? OLIVIA YU-NMOCD; KENDA MONTOYA-SLO			
By Whom?	WADE DITTRICH	Date and Hour	2/8/2018 @ 8:28 AM		
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.			

**RECEIVED**  
*By Olivia Yu at 9:58 am, Feb 16, 2018*

If a Watercourse was Impacted, Describe Fully.\*

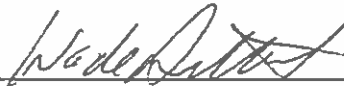

Describe Cause of Problem and Remedial Action Taken.\*

Lack of gauges caused tank to overflow. Vacuum truck was used to pick up free standing Oil. Contractor shoveled out soaked material and hauled off to disposal, replaced with new. Issue has been addressed and CTB has been returned to service.

Describe Area Affected and Cleanup Action Taken.\*

The affected area is 7x26 ft inside lined facility (measurements are subject to change with GPS tracking). Remediation has been completed in accordance with a remediation plan approved by the NMOCD and the SLO. See pictures for proof of integrity of the liner.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.

Signature: 	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: WADE DITTRICH	Approved by Environmental Specialist: 	
Title: ENVIRONMENTAL SPECIALIST	Approval Date: <span style="border: 1px solid red; padding: 2px;">2/16/2018</span>	Expiration Date:
E-mail Address: wade_dittrich@oxy.com	Conditions of Approval:	Attached <input checked="" type="checkbox"/>
Date: <u>2-15-18</u> Phone: 575-390-2828	- See attached directive. - Affirmation statement of liner integrity.	
Attach Additional Sheets If Necessary		

nOY1804740772

pOY1804741465

1RP-4969

Operator/Responsible Party,

The OCD has received the form C-141 you provided on 2/15/2018 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 1RP-4969 has been assigned. **Please refer to this case number in all future correspondence.**

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

*The responsible person shall complete division-approved corrective action for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]*

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. **As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District 1 office in Hobbs on or before 3/16/2018. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.**

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.
- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.
- Nominal detection limits for field and laboratory analyses must be provided.
- Composite sampling is not generally allowed.
- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

- Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

- If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

- Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

**Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.**

**Jim Griswold**

OCD Environmental Bureau Chief  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
505-476-3465  
jim.griswold@state.nm.us

# **APPENDIX B**

## **NCH1835251206 BBC Closure Report**

# Closure Report

## Site Description

Site Name:	State P CTB
Company:	Oxy USA Inc.
Legal Description:	U/L M, Section 32, T22S, R 38E
County:	Lea County, NM
GPS Coordinates:	N 32.34471 W-103.08901

## Release Data

Date of Release:	11/12/18
Type of Release:	Produced water
Source of Release:	Tank spill due to transfer pump failure
Volume of Release:	30 bbls
Volume Recovered:	25 bbls

## Remediation Specifications

Remediation Parameters:	Remediation was completed by removing all contaminated material from within the lined facility. The liner was inspected for integrity and found to be in excellent condition. The lined facility was backfilled with clean material.	
Remediation Activities:	January 2019	
Plan Sent to OCD:	n/a	n/a
OCD Approval of Plan:	n/a	n/a
Plan Sent to BLM:	n/a	n/a
BLM Approval of Plan:	n/a	n/a

## Supporting Documentation

Initial C-141	Signed 11/16/18
Final C-141	Signed 1/16/19
Site Diagram	January 2019
Pictures	Liner integrity photos

## Request for Closure

Based on the completion of the remediation plan, BBC International, Inc. requests closure approval from NMOCD.

Cliff Brunson, President, BBC International, Inc.

01/25/2019

Form C-141

State of New Mexico  
Oil Conservation Division

Page 3

Incident ID	NCH1835251206
District RP	1RP-5276
Facility ID	
Application ID	PCH183525163

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

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

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

- Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- Field data
- Data table of soil contaminant concentration data
- Depth to water determination
- Determination of water sources and significant watercourses within 1/2-mile of the lateral extents of the release
- Boring or excavation logs
- Photographs including date and GIS information
- Topographic/Aerial maps
- Laboratory data including chain of custody

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

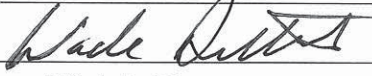
Form C-141

State of New Mexico  
Oil Conservation Division

Page 4

Incident ID	NCH1835251206
District RP	1RP-5276
Facility ID	
Application ID	PCH183525163

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: Wade Dittrich Title: Environmental Coordinator  
 Signature:  Date: 1-16-19  
 email: wade\_dittrich@oxy.com Telephone: (575) 390-2828

**OCD Only**

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



Form C-141  
Page 5

State of New Mexico  
Oil Conservation Division

Incident ID	NCH1835251206
District RP	1RP-5276
Facility ID	
Application ID	PCH183525163

### Remediation Plan

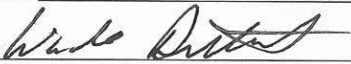
**Remediation Plan Checklist:** Each of the following items must be included in the plan.

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

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

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

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: Wade Dittrich Title: Environmental Coordinator  
 Signature:  Date: 1-16-19  
 email: wade\_dittrich@oxy.com Telephone: (575) 390-2828

**OCD Only**

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

- Approved       Approved with Attached Conditions of Approval       Denied       Deferral Approved

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

Form C-141

State of New Mexico  
Oil Conservation Division

Page 6

Incident ID	NCH1835251206
District RP	1RP-5276
Facility ID	
Application ID	PCH183525163


### 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: Wade Dittrich Title: Environmental Coordinator  
 Signature:  Date: 1-16-12  
 email: wade\_dittrich@oxy.com Telephone: (575) 390-2828

**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: \_\_\_\_\_

# Oxy, State P CTB

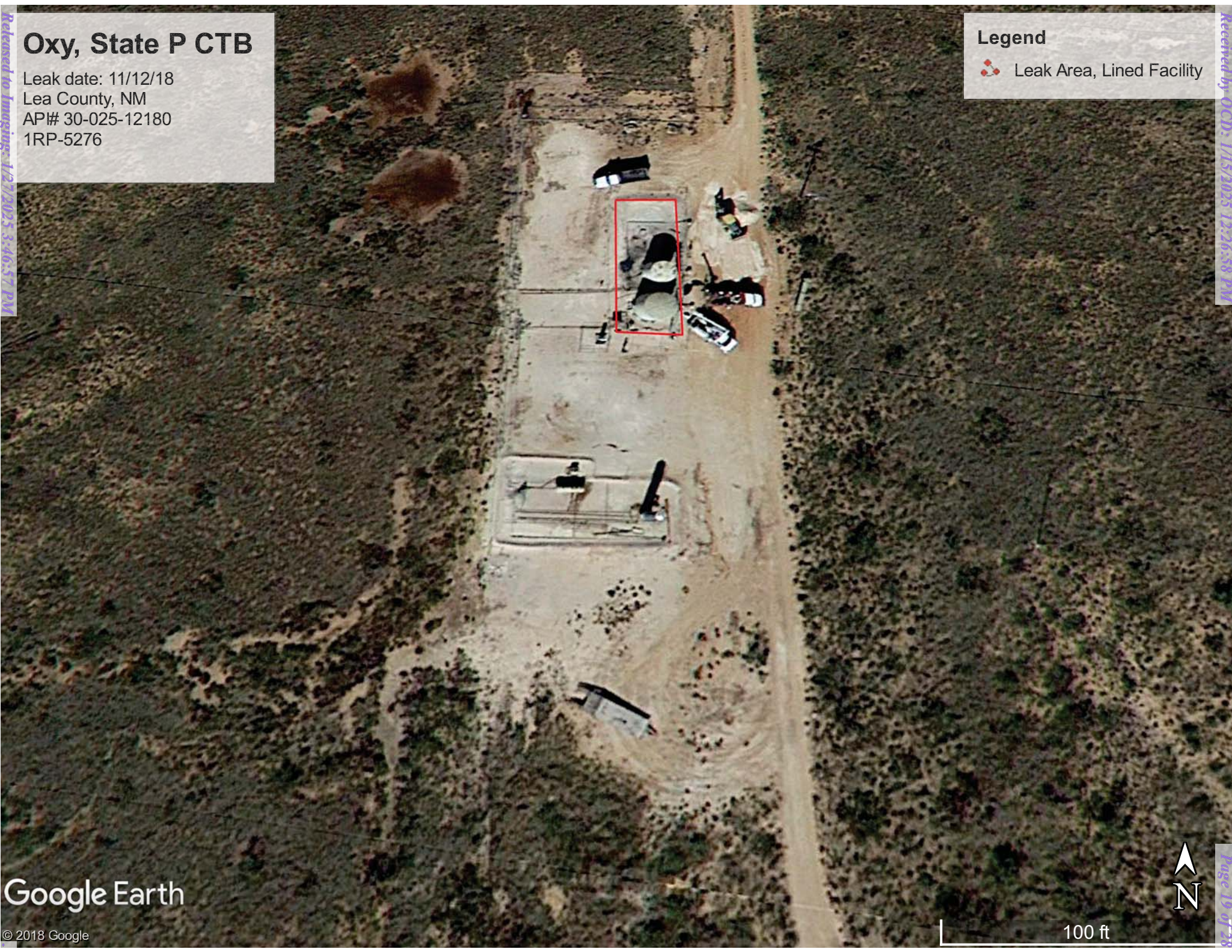
Leak date: 11/12/18  
Lea County, NM  
API# 30-025-12180  
1RP-5276

**Legend**

-  Leak Area, Lined Facility

Released to Imaging: 1/2/2025 3:46:57 PM

Received by OCD: 1/5/2025 12:26:58 PM



Google Earth

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100 ft



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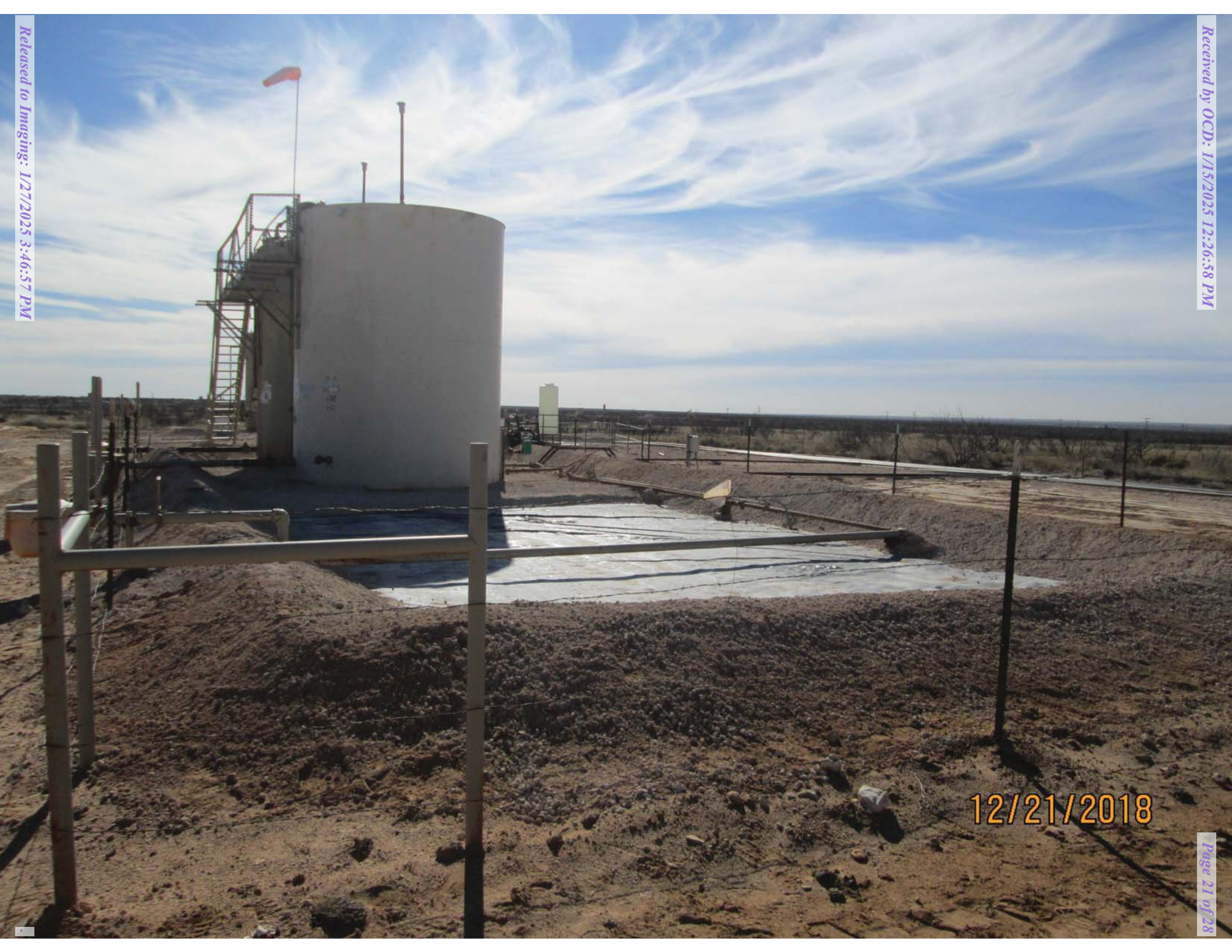


EMERGENCY NUMBER  
1-575-393-3021  
OXY USA INC.

121152-1

**NOTICE**  
EQUIPMENT MUST BE  
GROUNDED WHILE  
LOADING AND  
UNLOADING

12/21/2018



12/21/2018



12/21/2018

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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 420988

**QUESTIONS**

Operator: J R OIL, LTD. CO. P.O. Box 53657 Lubbock, TX 79453	OGRID: 256073
	Action Number: 420988
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Prerequisites</b>	
Incident ID (n#)	nOY1804740772
Incident Name	NOY1804740772 STATE P CTB @ 30-025-12181
Incident Type	Oil Release
Incident Status	Remediation Closure Report Received
Incident Well	[30-025-12181] STATE P #003

<b>Location of Release Source</b>	
<i>Please answer all the questions in this group.</i>	
Site Name	State P CTB
Date Release Discovered	02/08/2018
Surface Owner	Private

<b>Incident Details</b>	
<i>Please answer all the questions in this group.</i>	
Incident Type	Oil 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

<b>Nature and Volume of Release</b>	
<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	Cause: Overflow - Tank, Pit, Etc.   Tank (Any)   Crude Oil   Released: 10 BBL   Recovered: 8 BBL   Lost: 2 BBL.
Produced Water Released (bbls) Details	Cause: Overflow - Tank, Pit, Etc.   Tank (Any)   Produced Water   Released: 0 BBL   Recovered: 0 BBL   Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	No
Condensate Released (bbls) Details	Cause: Overflow - Tank, Pit, Etc.   Tank (Any)   Condensate   Released: 0 BBL   Recovered: 0 BBL   Lost: 0 BBL.
Natural Gas Vented (Mcf) Details	Cause: Overflow - Tank, Pit, Etc.   Tank (Any)   Natural Gas Vented   Released: 0 Mcf   Recovered: 0 Mcf   Lost: 0 Mcf.
Natural Gas Flared (Mcf) Details	Cause: Overflow - Tank, Pit, Etc.   Tank (Any)   Natural Gas Flared   Released: 0 Mcf   Recovered: 0 Mcf   Lost: 0 Mcf.
Other Released Details	Cause: Overflow - Tank, Pit, Etc.   Tank (Any)   Crude Oil   Released: 0 BBL   Recovered: 0 BBL   Lost: 0 BBL.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	No additional details. Crude oil release, original details correct.

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QUESTIONS, Page 2

Action 420988

**QUESTIONS (continued)**

Operator: J R OIL, LTD. CO. P.O. Box 53657 Lubbock, TX 79453	OGRID: 256073
	Action Number: 420988
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Nature and Volume of Release (continued)</b>	
Is this a gas only submission (i.e. only significant Mcf values reported)	<b>No, according to supplied volumes this does not appear to be a "gas only" report.</b>
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	<b>No</b>
Reasons why this would be considered a submission for a notification of a major release	<i>Unavailable.</i>
<i>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.</i>	

**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	<b>True</b>
The impacted area has been secured to protect human health and the environment	<b>True</b>
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	<b>True</b>
All free liquids and recoverable materials have been removed and managed appropriately	<b>True</b>
If all the actions described above have not been undertaken, explain why	<b>No additional comments.</b>

*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: Brittany Long Title: Consultant Email: brittany.long@tetrattech.com Date: 01/15/2025
--	---



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QUESTIONS, Page 3

Action 420988

**QUESTIONS (continued)**

Operator: J R OIL, LTD. CO. P.O. Box 53657 Lubbock, TX 79453	OGRID: 256073
	Action Number: 420988
	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 100 and 500 (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
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Between ½ and 1 (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	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	Between 1 and 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	12/21/2018
On what date will (or did) the final sampling or liner inspection occur	01/07/2019
On what date will (or was) the remediation complete(d)	01/28/2019
What is the estimated surface area (in square feet) that will be remediated	430
What is the estimated volume (in cubic yards) that will be remediated	16
<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 420988

**QUESTIONS (continued)**

Operator: J R OIL, LTD. CO. P.O. Box 53657 Lubbock, TX 79453	OGRID: 256073
	Action Number: 420988
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Remediation Plan (continued)</b>	
<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>	
<b>This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:</b>	
<i>(Select all answers below that apply.)</i>	
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)	No
<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: Brittany Long Title: Consultant Email: <a href="mailto:brittany.long@tetrattech.com">brittany.long@tetrattech.com</a> Date: 01/15/2025
<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 420988

**QUESTIONS (continued)**

Operator: J R OIL, LTD. CO. P.O. Box 53657 Lubbock, TX 79453	OGRID: 256073
	Action Number: 420988
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Liner Inspection Information</b>	
Last liner inspection notification (C-141L) recorded	<b>420958</b>
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	<b>01/07/2019</b>
Was all the impacted materials removed from the liner	<b>Yes</b>
What was the liner inspection surface area in square feet	<b>430</b>

**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	<b>Yes</b>
Have the lateral and vertical extents of contamination been fully delineated	<b>Yes</b>
Was this release entirely contained within a lined containment area	<b>Yes</b>
What was the total surface area (in square feet) remediated	<b>430</b>
What was the total volume (cubic yards) remediated	<b>16</b>

Summarize any additional remediation activities not included by answers (above)	<p>According to information provided by J R Oil to Tetra Tech, BBC International, Inc. (BBC) was contracted by the former operator (Oxy) to perform work associated with these 2018 releases (NOY1804740772 and NCH1835251206) at the State P CTB. From review of available files, following the November 2018 release, BBC was contracted to execute the remediation of incident NCH1835251206. The ensuing work presumably addressed the impacts associated with the prior release (NOY1804740772). Based on available documentation, in January 2019, BBC executed the remediation by removing all contaminated material from within the lined facility. Thereafter, a liner inspection was performed to confirm the integrity of the facility's liner. BBC drafted a Closure Report, dated January 25, 2019, documenting these remedial actions and liner inspection performed. The Closure Report is included as Appendix B. Photographic documentation of the exposed liner is included in the BBC Closure Report. According to the Closure Report and evidenced by the photographic documentation, the liner was found to be in good condition. Once the liner inspection was completed, the lined facility was backfilled with clean material.</p>
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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: Brittany Long Title: Consultant Email: brittany.long@tetratech.com Date: 01/15/2025
--	--

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CONDITIONS

Action 420988

**CONDITIONS**

Operator: J R OIL, LTD. CO. P.O. Box 53657 Lubbock, TX 79453	OGRID: 256073
	Action Number: 420988
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**CONDITIONS**

Created By	Condition	Condition Date
rhamlet	We have received your Remediation Closure Report for Incident #NOY1804740772 STATE P #003, thank you. This Remediation Closure Report is approved.	1/27/2025