



March 19, 2025

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

**Re: REVISED Release Characterization and Closure Request Addendum
BTA Oil Producers, LLC
Rojo 22-25 CTB @ 0 Release
Unit Letter N, Section 22, Township 25 South, Range 33 East
Lea County, New Mexico
Incident ID# nAPP2430254795**

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by BTA Oil Producers, LLC (BTA) to assess a release that occurred at the Rojo 22-25 Tank Battery. The release footprint is located in Public Land Survey System (PLSS) Unit Letter N, Section 22, Township 25 South, Range 33 East, in Lea County, New Mexico (Site). The approximate release point occurred at coordinates 32.111024°, -103.563668°, as shown in Figures 1 and 2.

BACKGROUND

According to the State of New Mexico Oil Conservation Division (NMOCD) C-141 Initial Report, the release occurred on October 27, 2024, due to a hole at a tee on a main water line. Approximately 18.7 barrels (bbls) of produced water were released of which 10 bbls were recovered. According to photographic documentation, the release was on the pad and does not appear to have affected the pasture. On behalf of BTA, on October 28, 2024, Tetra Tech personnel submitted a notice of release. Subsequently, on October 29, an initial C-141 was submitted to The New Mexico Oil Conservation Division (NMOCD). The NMOCD approved the initial C-141 the same day and assigned the release Incident Identification (ID) nAPP2430254795. The C-141 form is included in Appendix A.

SITE CHARACTERIZATION

A site characterization was performed and no sinkholes, residences, schools, hospitals, institutions, churches, springs, private domestic water wells, stream bodies, wetlands, incorporated municipal boundaries, subsurface mines, or floodplains are located within the distances specified in 19.15.29 New Mexico Administrative Code (NMAC). The Site is in an area of low karst potential.

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 51 and 100 ft.
Method used to determine the depth to ground water	NM OSE iWaters Database Search

Tetra Tech

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Revised Release Characterization and Closure Request Addendum
March 19, 2025

BTA Oil Producers, LLC

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	Between 1 and 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or 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	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1 and 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
A (non-karst) unstable area	Greater than 5 (mi.)
Categorized 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

There is one water well listed in the New Mexico Office of the State Engineer (NMOSE database located within approximately ½ mile (800 meters) of the site, approximately 0.25 miles (402 meters) southeast of the approximate release point. The well was completed to a total depth of 80 feet bgs and the well log indicates that the boring was a dry hole. The site characterization data is included 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

INITIAL SITE ASSESSMENT

Tetra Tech personnel mobilized to the site on November 1, 2024, to collect initial assessment samples. The NMOCD district office was notified via the OCD Fee Application Portal in accordance with Subsection D of 19.15.29.12 NMAC. Documentation of associated regulatory correspondence is included in Appendix C. A total of eight (8) borings (AH-1 through AH-8) were installed in the boundaries of the release footprint. Three (3) borings (AH-5, AH-7, and AH-8) were installed to a depth of 4 feet bgs within the release area footprint to achieve vertical delineation and are representative of floor samples. Five (5) borings (AH-1 through AH-4 and AH-6) were installed to a depth of 1-foot bgs outside the release area footprint to achieve horizontal delineation and are representative of sidewall samples. Soil samples collected were field screened for salinity parts per million (ppm) using an ExStik II EC 400 meter. The approximate release extent and boring locations are shown in Figure 3.

A total of eleven (11) samples were collected from the eight (8) boring locations and submitted to Cardinal Laboratories (Cardinal) in Hobbs, New Mexico to be analyzed for chlorides via EPA Method 4500.0, TPH via EPA Method 8015M, and BTEX via EPA Method 8021B. The release extent consisted of approximately 965 sf. Samples were collected such that each discrete sample (horizontal and vertical) was representative of approximately 200 square feet. A copy of the laboratory analytical report and chain-of-custody documentation are included in Appendix D. Photographic documentation of Site conditions at the time of the assessment is presented in Appendix E.

Analytical results from the 2024 sampling activities are summarized in Table 1. After a review of the analytical results from the sampling event, both horizontal and vertical delineation was achieved following the November 2024 soil sampling activities. All analytical results were below the Site RRALs and reclamation requirements for all constituents.

INITIAL RESPONSE ACTIVITIES

In accordance with 19.15.29.8. B. (4) NMAC that states “the responsible party may commence remediation immediately after discovery of a release,” BTA elected to begin remediation of the impacted area on November 6, 2024. Although the data had been collected and received, as a proactive response, BTA scraped the visible release extent to a depth of 2 to 3 inches bgs. The remedial action resulted in approximately 2 cubic yards of contaminated soil being removed. No waste manifests of initial response activities were provided. Photographic documentation of the release extent before and after the scrape is included in Appendix D. The initial response area is indicated in Figure 4.

RELEASE CHARACTERIZATION AND CLOSURE REQUEST REJECTION

A Release Characterization and Closure Request was submitted by Tetra Tech on behalf of BTA, dated December 18, 2024, to the NMOCD via the portal describing the initial response and assessment activities. The request was denied by Ms. Shelly Wells on December 24, 2024, with the following comments:

- *Remediation closure denied for the following: 1) Delineation samples should be collected to the west and south of release point. 2) In order to use delineation grab samples for closure, a variance should be requested pursuant to 19.15.29.14 NMAC; otherwise “without division approval, the responsible party may elect to perform a composite and grab sample plan...where each composite sample is not representative of more than 200 square feet.” 3) Referencing the National Wetlands*

Inventory Mapper, the minimum distances to the following should be updated to 1-5 miles under Site Characterization: a playa lake, a wetland and significant watercourse. Submit remediation closure report to the OCD by 3/24/25.

A copy of the regulatory correspondence is included in Appendix C.

SUPPLEMENTAL ASSESSMENT AND SAMPLING RESULTS

On January 17, 2025, Tetra Tech personnel returned to the Site to provide supplemental data by assessing the areas west and south of the release point. Two (2) supplemental soil borings (AH-9 and AH-10) were installed with a hand auger to a depth of 1-foot bgs. The approximate release extent and boring locations are shown in Figure 3.

Prior to sampling, the NMOCD district office was notified via the OCD Fee Application Portal in accordance with Subsection D of 19.15.29.12 NMAC. Documentation of associated regulatory correspondence is included in Appendix C.

A total of two (2) samples were collected from the 2 boring locations and submitted to Cardinal to be analyzed for chlorides via EPA Method 4500.0, TPH via EPA Method 8015M, and BTEX via EPA Method 8021B. A copy of the laboratory analytical reports and chain-of-custody documentation is included in Appendix D.

Analytical results from the January 2025 soil sampling event are summarized in Table 1. All analytical results were below the proposed Site RRALs and reclamation requirements for all constituents. These two supplemental borings provide the necessary data to complete horizontal delineation as commented in the closure request denial.

Based on the location of these borings and the analytical results, no further assessment of soils (both vertically and horizontally) is required at the Site. The OCD stipulations have been fulfilled.

REVISED CLOSURE REQUEST REJECTION AND VARIANCE REQUEST

A Revised Release Characterization and Closure Request was submitted by Tetra Tech on behalf of BTA, dated February 26, 2025, to the NMOCD via the portal. The request was denied once more by Ms. Shelly Wells on March 13, 2025, with the following comments:

- *Remediation closure denied for the following: 1) Two of the 12/24/24 reasons for rejection have not been addressed. The first is "In order to use delineation grab samples for closure, a variance should be requested pursuant to 19.15.29.14 NMAC; otherwise "without division approval, the responsible party may elect to perform a composite and grab sample plan...where each composite sample is not representative of more than 200 square feet." You have not submitted a variance request or collected five-point composite samples every 200 square feet within the entire release area. A surface scrape was performed. Pursuant to 19.15.29.12(D) NMAC, "the responsible party must test the remediated areas for contamination with representative five-point composite samples from the walls and base..."2) The second was to update the minimum distances to a playa lake, a wetland and a significant watercourse to 1-5 miles, both in the C-141 application itself and the report. You have updated them in your remediation closure report however the answers under the Site Characterization portion of the C-141 application have not been updated to reflect this. Submit remediation closure report to the OCD by 5/12/25.*

A copy of the regulatory correspondence is included in Appendix C.

On March 13, 2025, Tetra Tech contacted Ms. Shelly Wells of the NMOCD via telephone to clarify the rejection comments. During this call, Ms. Wells stated that this rejection was based on the lack of a variance request being submitted for the assessment samples collected at the release site. Additionally, there was an incorrect entry in the site characterization portion of the C-141 application.

Revised Release Characterization and Closure Request Addendum
March 19, 2025

BTA Oil Producers, LLC

A variance request to use delineation grab samples for closure, pursuant to 19.15.29.14 NMAC was requested via email on March 13, 2025. The variance request was subsequently approved that same day. A copy of the variance request is included in Appendix C. During the OCD submittal process the incorrect entries in the site characterization will be rectified.

CONCLUSION

Based on the results of the initial site assessment, initial response, supplemental assessment, and the approved variance request, BTA respectfully requests closure of the incident. The current release footprint is fully delineated. All analytical results associated with the site sampling event were below applicable Site RRALs following the initial response actions; therefore, remediation of the on-pad release footprint is complete. The impacted surface area was remediated to meet the standards of Table I of 19.15.29.12 NMAC during the initial response remedial activities.

This final closure request details the release characterization, remediation activities and the results of the assessment sampling. The final C-141 forms are enclosed in Appendix A. If you have any questions concerning the soil assessment activities for the Site, please call me at (512) 560-9064.

Sincerely,
Tetra Tech, Inc.



Nicholas M. Poole, P.G.
Project Manager



Samantha Allen
Project Lead

cc: Ray Ramos, BTA Oil Producers, LLC

LIST OF ATTACHMENTS

Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Approximate Release Extent and Site Assessment Map
- Figure 4 – Approximate Release Extent and Initial Response Map

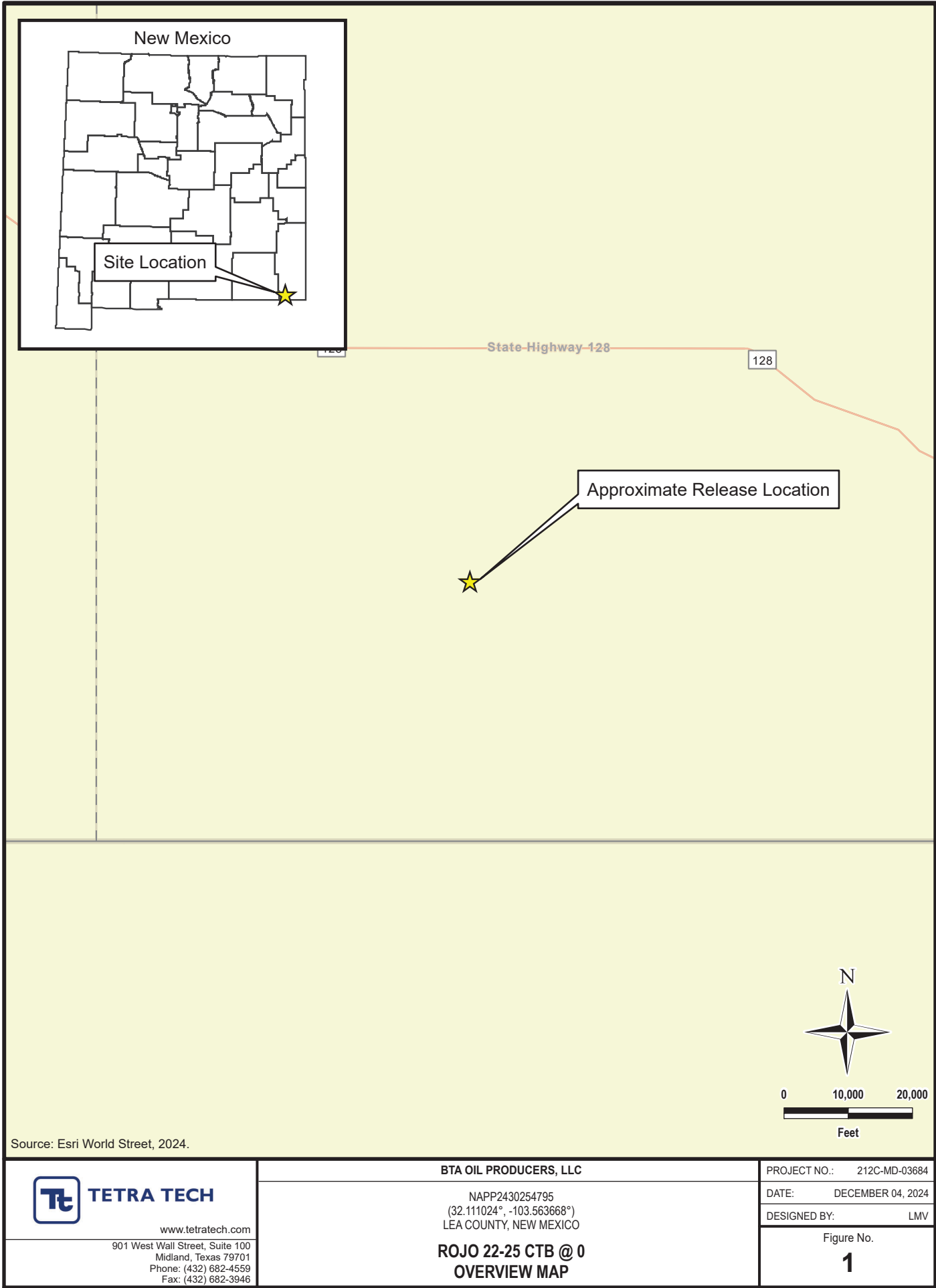
Tables:

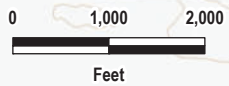
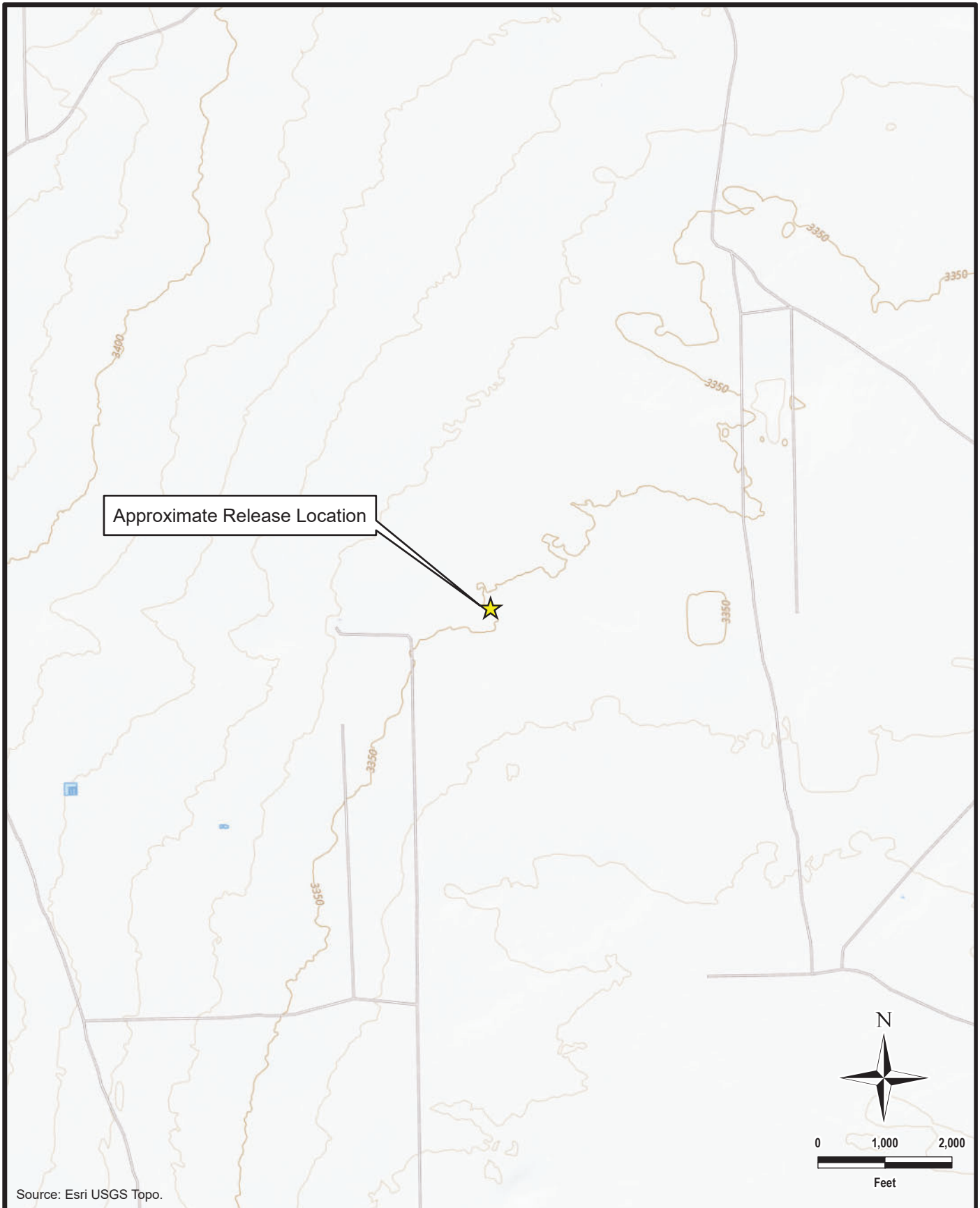
- Table 1 – Summary of Analytical Results – Soil Assessment

Appendices:

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

FIGURES





Source: Esri USGS Topo.



TETRA TECH

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BTA OIL PRODUCERS, LLC

NAPP2430254795
(32.111024°, -103.563668°)
LEA COUNTY, NEW MEXICO

**ROJO 22-25 CTB @ 0
TOPOGRAPHIC MAP**

PROJECT NO.: 212C-MD-03684

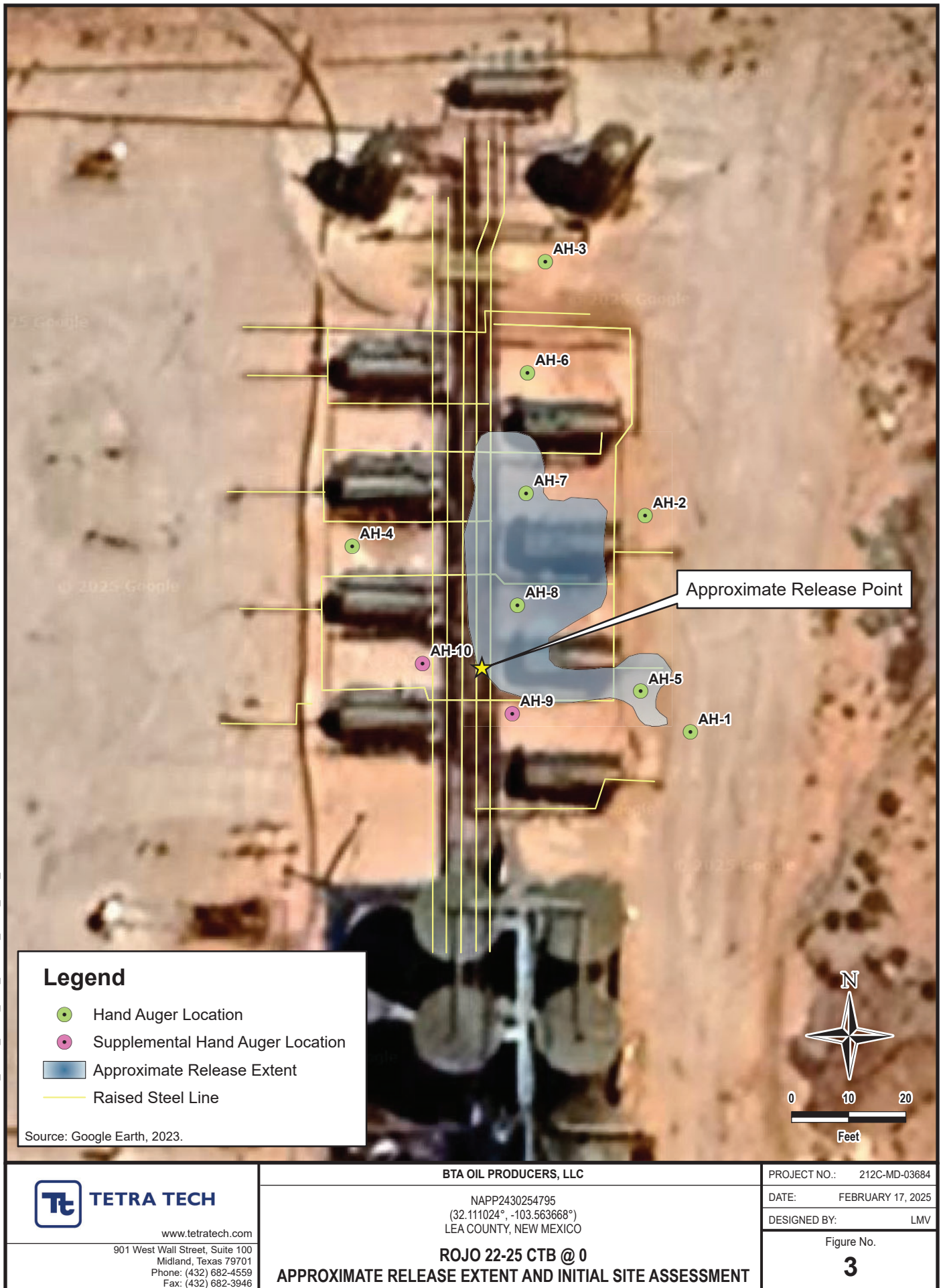
DATE: DECEMBER 04, 2024

DESIGNED BY: LMV

Figure No.

2

DOCUMENT PATH: Y:\BTA\212C-MD-03684_ROJO_22-25_CTB_0\ROJO_22-25_CTB_0.APRX





TABLES

TABLE 1
SUMMARY OF ANALYTICAL RESULTS
SOIL ASSESSMENT- nAPP2430254795
BTA Oil Producers, LLC
ROJO 22-25 CTB @ 0
LEA COUNTY, NM

Sample ID	Sample Date	Sample Depth	Field Screening Results	Chloride		BTEX ²										TPH ³						
			Chloride			Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO	DRO		EXT DRO		Total TPH	
		ft. bgs	ppm	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	C ₆ - C ₁₀	> C ₁₀ - C ₂₈		> C ₂₈ - C ₃₆		(GRO+DRO+EXT DRO)	
AH-1	11/1/2024	0-1	80.1	32		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
AH-2	11/1/2024	0-1	176	64		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
AH-3	11/1/2024	0-1	65.2	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
AH-4	11/1/2024	0-1	160	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
AH-5	11/1/2024	0-1	450	224		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
		2-3	263	48		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
AH-6	11/1/2024	0-1	382	112		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
		2-3	450	224		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
AH-7	11/1/2024	0-1	314	32		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
		2-3	259	48		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
AH-8	11/1/2024	0-1	469	176		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
AH-9	1/16/2025	0-1	-	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
AH-10	1/16/2025	0-1	-	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<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
Phone:(575) 393-6161 Fax:(575) 393-0720

District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720

District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170

District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico

Energy, Minerals and Natural Resources

Oil Conservation Division

1220 S. St Francis Dr.

Santa Fe, NM 87505

QUESTIONS

Action 396457

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 396457
	Action Type: [NOTIFY] Notification Of Release (NOR)

QUESTIONS

Location of Release Source	
Please answer all the questions in this group.	
Site Name	Rojo 22-25 CTB
Date Release Discovered	10/27/2024
Surface Owner	Federal

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: Corrosion Pipeline (Any) Produced Water Released: 19 BBL Recovered: 0 BBL Lost: 19 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)	The release occurred at approximately 1:00 am MDT on October 27, 2024. The release occurred due to a hole at a tee on a main water line. Approximately 18.7 bbls of produce water were released, of which 10 bbls of produced water was recovered.

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QUESTIONS, Page 2

Action 396457

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 396457
	Action Type: [NOTIFY] Notification Of Release (NOR)

QUESTIONS

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

Initial Response

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

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

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

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ACKNOWLEDGMENTS

Action 396457

ACKNOWLEDGMENTS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 396457
	Action Type: [NOTIFY] Notification Of Release (NOR)

ACKNOWLEDGMENTS

<input checked="" type="checkbox"/>	I acknowledge that I am authorized to submit notification of a release on behalf of my operator.
<input checked="" type="checkbox"/>	I acknowledge that upon submitting this application, I will be creating a new incident file (assigned to my operator) to track the notification(s) and corrective action(s) for a release, pursuant to NMAC 19.15.29.
<input checked="" type="checkbox"/>	I acknowledge that creating a new incident file will require my operator to file subsequent submission(s) of form "C-141, Application for administrative approval of a release notification and corrective action", pursuant to NMAC 19.15.29.
<input checked="" type="checkbox"/>	I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment.
<input checked="" type="checkbox"/>	I acknowledge the fact that the acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment.
<input checked="" type="checkbox"/>	I acknowledge the fact that, in addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

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CONDITIONS

Action 396457

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 396457
	Action Type: [NOTIFY] Notification Of Release (NOR)

CONDITIONS

Created By	Condition	Condition Date
nicholas poole	When submitting future reports regarding this release, please submit the calculations used or specific justification for the volumes reported on the initial C-141.	10/28/2024



WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

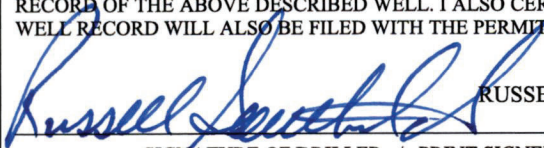
www.ose.state.nm.us

1. GENERAL AND WELL LOCATION	OSE POD NO. (WELL NO.) C-4698-POD 1		WELL TAG ID NO.		OSE FILE NO(S). C-4698			
	WELL OWNER NAME(S) BTA OIL PRODUCERS LLC				PHONE (OPTIONAL) 432-682-3753			
	WELL OWNER MAILING ADDRESS 104 S PECOS STREET				CITY MIDLAND	STATE TX	ZIP 79701	
	WELL LOCATION (FROM GPS)	DEGREES LATITUDE 32	MINUTES 6	SECONDS 28.0	N	* ACCURACY REQUIRED: ONE TENTH OF A SECOND		
		LONGITUDE -103	33	44.0	W	* DATUM REQUIRED: WGS 84		
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS - PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE ROJO B 7844 JV P# 001H								
2. DRILLING & CASING INFORMATION	LICENSE NO. WD-1184		NAME OF LICENSED DRILLER RUSSELL SOUTHERLAND			NAME OF WELL DRILLING COMPANY WEST TEXAS WATER WELL SERVICE		
	DRILLING STARTED 1/18/2023	DRILLING ENDED 1/18/2023	DEPTH OF COMPLETED WELL (FT) 80	BORE HOLE DEPTH (FT)	DEPTH WATER FIRST ENCOUNTERED (FT)			
	COMPLETED WELL IS: <input type="checkbox"/> ARTESIAN <input checked="" type="checkbox"/> DRY HOLE <input type="checkbox"/> SHALLOW (UNCONFINED)				STATIC WATER LEVEL IN COMPLETED WELL (FT) N/A			
	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:							
	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						
				NO CASING IN HOLE				
3. ANNULAR MATERIAL	DEPTH (feet bgl)		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL	AMOUNT (cubic feet)	METHOD OF PLACEMENT		
	FROM	TO						
				N/A				

FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 04/30/19)

FILE NO. C-04698	POD NO. 1	TRN NO. 740770
LOCATION 255.33E.27.214	WELL TAG ID NO.	PAGE 1 OF 2

4. HYDROGEOLOGIC LOG OF WELL	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	1		CALICHIE PAD	Y ✓ N	
	1	8		SAND	Y ✓ N	
	8	20		CALICHIE	Y ✓ N	
	20	30		CALICHIE	Y ✓ N	
	30	40		TAN SAND	Y ✓ N	
	40	60		SAND	Y ✓ N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
METHOD USED TO ESTIMATE YIELD OF WATER-BEARING STRATA:					TOTAL ESTIMATED WELL YIELD (gpm): 0.00	
<input type="checkbox"/> PUMP <input type="checkbox"/> AIR LIFT <input type="checkbox"/> BAILER <input checked="" type="checkbox"/> OTHER - SPECIFY: DRY HOLE						
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: RUSSELL SOUTHERLAND					
6. SIGNATURE	BY SIGNING BELOW, I CERTIFY THAT TO THE BEST OF MY KNOWLEDGE AND BELIEF, THE FOREGOING IS A TRUE AND CORRECT RECORD OF THE ABOVE DESCRIBED WELL. I ALSO CERTIFY THAT THE WELL TAG, IF REQUIRED, HAS BEEN INSTALLED AND THAT THIS WELL RECORD WILL ALSO BE FILED WITH THE PERMIT HOLDER WITHIN 30 DAYS AFTER THE COMPLETION OF WELL DRILLING.					
	 RUSSELL SOUTHERLAND SIGNATURE OF DRILLER / PRINT SIGNEE NAME				OSE OIT JUN 12 2023 PM 1:53 1/18/2023 DATE	

FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 04/30/2019)

FILE NO. C-04698	POD NO. 1	TRN NO. 740770
LOCATION 255.33E.27.214	WELL TAG ID NO.	PAGE 2 OF 2

NM OCD - Karst Map

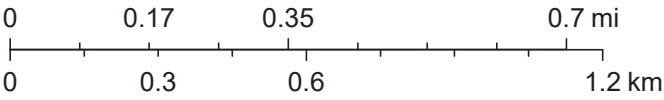


10/29/2024, 7:48:40 AM

Karst Occurrence Potential

Low

1:18,056

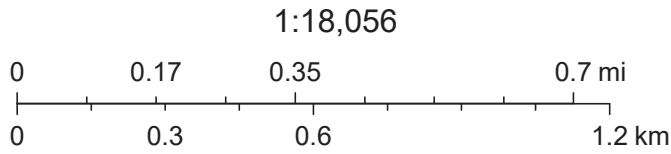


BLM, OCD, New Mexico Tech, Esri, HERE, Garmin, iPC, Maxar

NM OCD - Hydrology Map



10/29/2024, 7:47:22 AM



Esri, HERE, Garmin, IPC, Maxar, NM OSE

NM OCD - Land Ownership Map

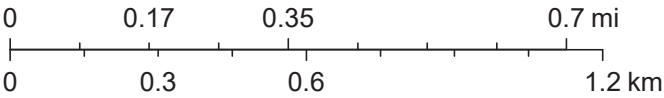


10/29/2024, 7:48:05 AM

Land Ownership

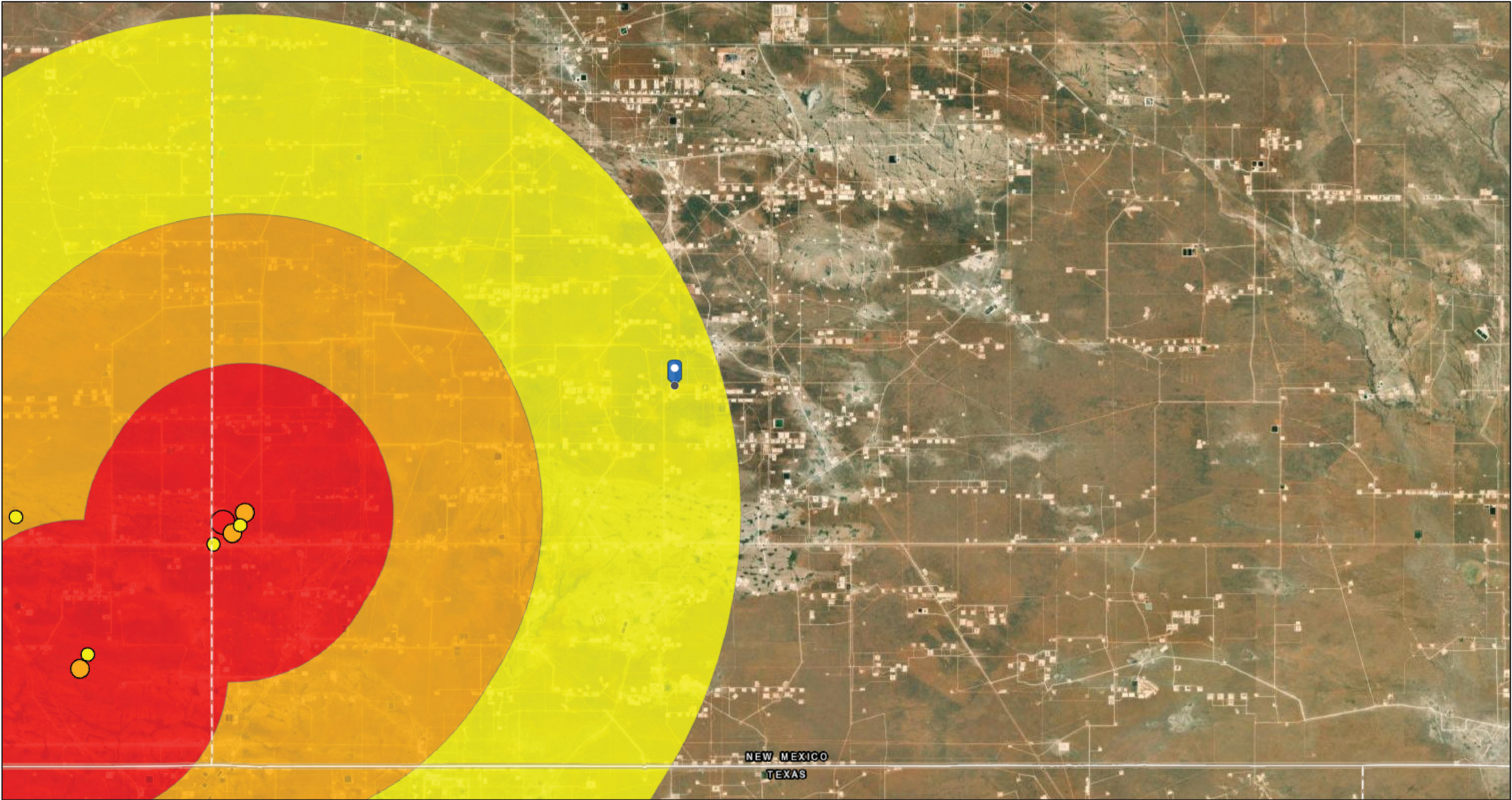
- BLM
- P
- S

1:18,056



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

NM OCD - Induced Seismicity Map



10/29/2024, 7:49:26 AM

Seismic Response 3.0 to 3.4

3 mi.

6 mi.

10 mi.

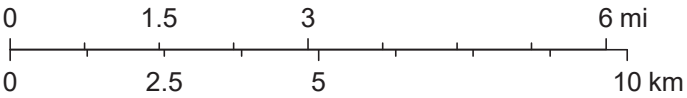
M2.5+ Earthquakes (2021+)

2.5 - 2.9

3.0 - 3.4

3.5 and above

1:144,448



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

National Flood Hazard Layer FIRMette



103°34'8"W 32°6'55"N



1:6,000

103°33'30"W 32°6'24"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 X
		NO SCREEN Area of Minimal Flood Hazard Zone X
OTHER AREAS		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 **10/29/2024 at 12:58 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.



October 29, 2024

Wetlands

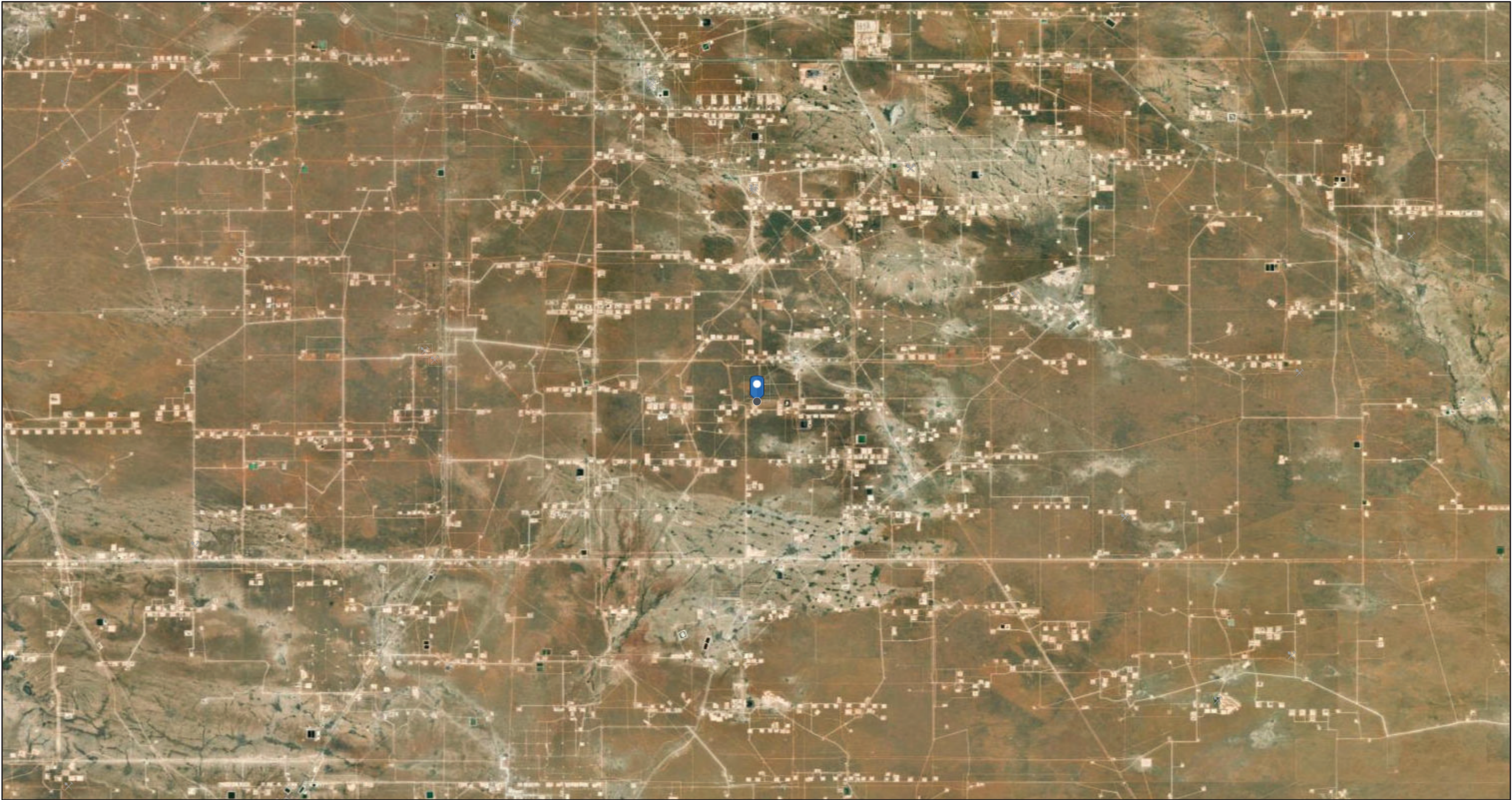
- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

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

- Lake
- Other
- Riverine

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

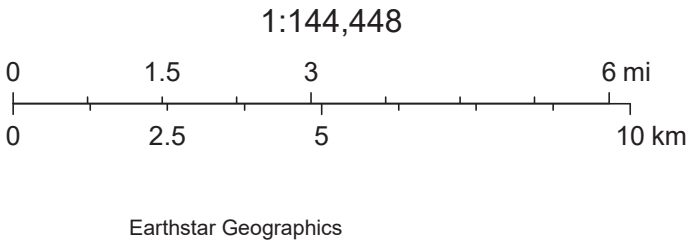
Active Mines in New Mexico



10/29/2024, 8:02:25 AM

Registered Mines

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



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

Release Location Name: Rojo 22-25 CTB

Date of Release: 10/27/2024

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

☒

Input Data:

If spill volumes from measurement, i.e. metering, tank volumes, etc. are known enter the volumes here: OIL: 0.0000 BBL WATER: 0.0000 BBL

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

Total Area Calculations

Standing Liquid Calculations

Total Area Calculations						Standing Liquid Calculations													
Total Surface Area	width		length	wet soil depth	oil (%)	Standing Liquid Area	width		length	liquid depth	oil (%)								
Rectangle Area #1	30.00	ft	X	50.00	ft	X	4.25	in	0.00%	Rectangle Area #1	30.00	ft	X	50.00	ft	X	0.25	in	0.00%
Rectangle Area #2	0.00	ft	X	0.00	ft	X	0.00	in	0.00%	Rectangle Area #2	0.00	ft	X	0.00	ft	X	0.00	in	0.00%
Rectangle Area #3	0.00	ft	X	0.00	ft	X	0.00	in	0.00%	Rectangle Area #3	0.00	ft	X	0.00	ft	X	0.00	in	0.00%
Rectangle Area #4	0.00	ft	X	0.00	ft	X	0.00	in	0.00%	Rectangle Area #4	0.00	ft	X	0.00	ft	X	0.00	in	0.00%
Rectangle Area #5	0.00	ft	X	0.00	ft	X	0.00	in	0.00%	Rectangle Area #5	0.00	ft	X	0.00	ft	X	0.00	in	0.00%
Rectangle Area #6	0.00	ft	X	0.00	ft	X	0.00	in	0.00%	Rectangle Area #6	0.00	ft	X	0.00	ft	X	0.00	in	0.00%
Rectangle Area #7	0.00	ft	X	0.00	ft	X	0.00	in	0.00%	Rectangle Area #7	0.00	ft	X	0.00	ft	X	0.00	in	0.00%
Rectangle Area #8	0.00	ft	X	0.00	ft	X	0.00	in	0.00%	Rectangle Area #8	0.00	ft	X	0.00	ft	X	0.00	in	0.00%

production system leak - DAILY PRODUCTION DATA REQUIRED

Average Daily Production: Oil _____ BBL Water _____ BBL

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

Amount of Free Liquid Recovered: 10 BBL okay

Percentage of Oil in Free Liquid Recovered: 0.00% (percentage)

Liquid holding factor *: 0.14 gal per gal

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

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

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

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

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

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

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

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

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

Saturated Soil Volume Calculations:

Total Solid/Liquid Volume: 1,500 sq. ft. H2O 531 cu. ft. OIL cu. ft.

Estimated Volumes Spilled

Liquid in Soil: 13.2 BBL 0.0 BBL
Free Liquid: 5.6 BBL 0.0 BBL
Totals: 18.8 BBL 0.0 BBL

Total Spill Liquid: 18.8 BBL 0.0 BBL

Recovered Volumes

Estimated oil recovered: 0.0 BBL check - okay
Estimated water recovered: 10.0 BBL check - okay

Free Liquid Volume Calculations:

Total Free Liquid Volume: 1,500 sq. ft. H2O 31 cu. ft. OIL cu. ft.

Estimated Production Volumes Lost

Estimated Production Spilled: 0.0 BBL 0.0 BBL

Estimated Surface Damage

Surface Area: 1,500 sq. ft.
Surface Area: .0344 acre

Estimated Weights, and Volumes

Saturated Soil = 59,500 lbs 531 cu.ft. 20 cu.yds.
Total Liquid = 19 BBL 790 gallon 6,573 lbs

District I
1625 N. French Dr., Hobbs, NM 88240
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Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
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Phone:(505) 476-3470 Fax:(505) 476-3462

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

QUESTIONS

Action 396537

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 396537
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2430254795
Incident Name	NAPP2430254795 ROJO 22-25 CTB @ 0
Incident Type	Produced Water Release
Incident Status	Initial C-141 Received
Incident Facility	[fAPP2130123342] Rojo 22 - 25

Location of Release Source	
Please answer all the questions in this group.	
Site Name	Rojo 22-25 CTB
Date Release Discovered	10/27/2024
Surface Owner	Federal

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: Corrosion Pipeline (Any) Produced Water Released: 19 BBL Recovered: 0 BBL Lost: 19 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)	The release occurred at approximately 1:00 am MDT on October 27, 2024. The release occurred due to a hole at a tee on a main water line. Approximately 18.7 bbls of produce water were released, of which 10 bbls of produced water was recovered.

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QUESTIONS, Page 2

Action 396537

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 396537
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	No
Reasons why this would be considered a submission for a notification of a major release	Unavailable.
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: 10/29/2024

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QUESTIONS, Page 3

Action 396537

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 396537
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS**Site Characterization**

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 75 and 100 (ft.)
What method was used to determine the depth to ground water	OCD Imaging Records Lookup
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	Greater than 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan

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

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

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CONDITIONS

Action 396537

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 396537
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

CONDITIONS

Created By	Condition	Condition Date
scwells	None	10/29/2024

APPENDIX B

Site Characterization Data



WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

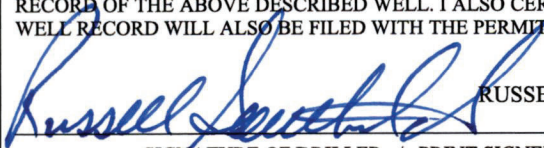
www.ose.state.nm.us

1. GENERAL AND WELL LOCATION	OSE POD NO. (WELL NO.) C-4698-POD 1		WELL TAG ID NO.		OSE FILE NO(S). C-4698			
	WELL OWNER NAME(S) BTA OIL PRODUCERS LLC				PHONE (OPTIONAL) 432-682-3753			
	WELL OWNER MAILING ADDRESS 104 S PECOS STREET				CITY MIDLAND	STATE TX	ZIP 79701	
	WELL LOCATION (FROM GPS)	DEGREES LATITUDE 32	MINUTES 6	SECONDS 28.0	N	* ACCURACY REQUIRED: ONE TENTH OF A SECOND		
		LONGITUDE -103	33	44.0	W	* DATUM REQUIRED: WGS 84		
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS – PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE ROJO B 7844 JV P# 001H								
2. DRILLING & CASING INFORMATION	LICENSE NO. WD-1184		NAME OF LICENSED DRILLER RUSSELL SOUTHERLAND			NAME OF WELL DRILLING COMPANY WEST TEXAS WATER WELL SERVICE		
	DRILLING STARTED 1/18/2023	DRILLING ENDED 1/18/2023	DEPTH OF COMPLETED WELL (FT) 80	BORE HOLE DEPTH (FT)	DEPTH WATER FIRST ENCOUNTERED (FT)			
	COMPLETED WELL IS: <input type="checkbox"/> ARTESIAN <input checked="" type="checkbox"/> DRY HOLE <input type="checkbox"/> SHALLOW (UNCONFINED)				STATIC WATER LEVEL IN COMPLETED WELL (FT) N/A			
	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:							
	DEPTH (feet bgl) FROM TO		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)
				NO CASING IN HOLE				
3. ANNULAR MATERIAL	DEPTH (feet bgl) FROM TO		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL		AMOUNT (cubic feet)	METHOD OF PLACEMENT	
				N/A				

FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 04/30/19)

FILE NO. C-04698	POD NO. 1	TRN NO. 740770
LOCATION 255.33E.27.214	WELL TAG ID NO.	PAGE 1 OF 2

4. HYDROGEOLOGIC LOG OF WELL	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	1		CALICHIE PAD	Y ✓ N	
	1	8		SAND	Y ✓ N	
	8	20		CALICHIE	Y ✓ N	
	20	30		CALICHIE	Y ✓ N	
	30	40		TAN SAND	Y ✓ N	
	40	60		SAND	Y ✓ N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
METHOD USED TO ESTIMATE YIELD OF WATER-BEARING STRATA:					TOTAL ESTIMATED WELL YIELD (gpm): 0.00	
<input type="checkbox"/> PUMP <input type="checkbox"/> AIR LIFT <input type="checkbox"/> BAILER <input checked="" type="checkbox"/> OTHER - SPECIFY: DRY HOLE						
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: RUSSELL SOUTHERLAND					
6. SIGNATURE	BY SIGNING BELOW, I CERTIFY THAT TO THE BEST OF MY KNOWLEDGE AND BELIEF, THE FOREGOING IS A TRUE AND CORRECT RECORD OF THE ABOVE DESCRIBED WELL. I ALSO CERTIFY THAT THE WELL TAG, IF REQUIRED, HAS BEEN INSTALLED AND THAT THIS WELL RECORD WILL ALSO BE FILED WITH THE PERMIT HOLDER WITHIN 30 DAYS AFTER THE COMPLETION OF WELL DRILLING.					
	 RUSSELL SOUTHERLAND SIGNATURE OF DRILLER / PRINT SIGNED NAME				OSE OIT JUN 12 2023 PM 1:53 1/18/2023 DATE	

FOR OSE INTERNAL USE

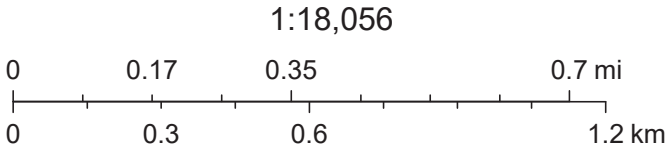
WR-20 WELL RECORD & LOG (Version 04/30/2019)

FILE NO. C-04698	POD NO. 1	TRN NO. 740770
LOCATION 255.33E.27.214	WELL TAG ID NO.	PAGE 2 OF 2

NM OCD - Karst Map



10/29/2024, 7:48:40 AM
Karst Occurrence Potential
Low

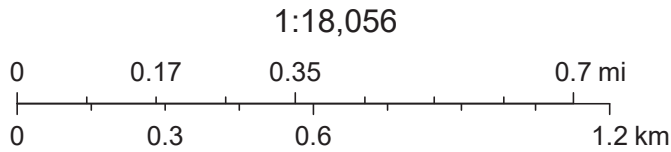


BLM, OCD, New Mexico Tech, Esri, HERE, Garmin, iPC, Maxar

NM OCD - Hydrology Map



10/29/2024, 7:47:22 AM



Esri, HERE, Garmin, IPC, Maxar, NM OSE

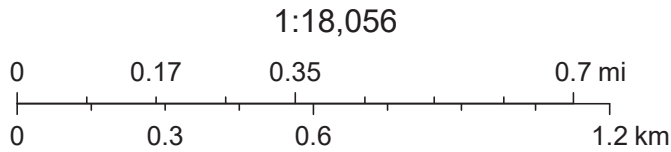
NM OCD - Land Ownership Map



10/29/2024, 7:48:05 AM

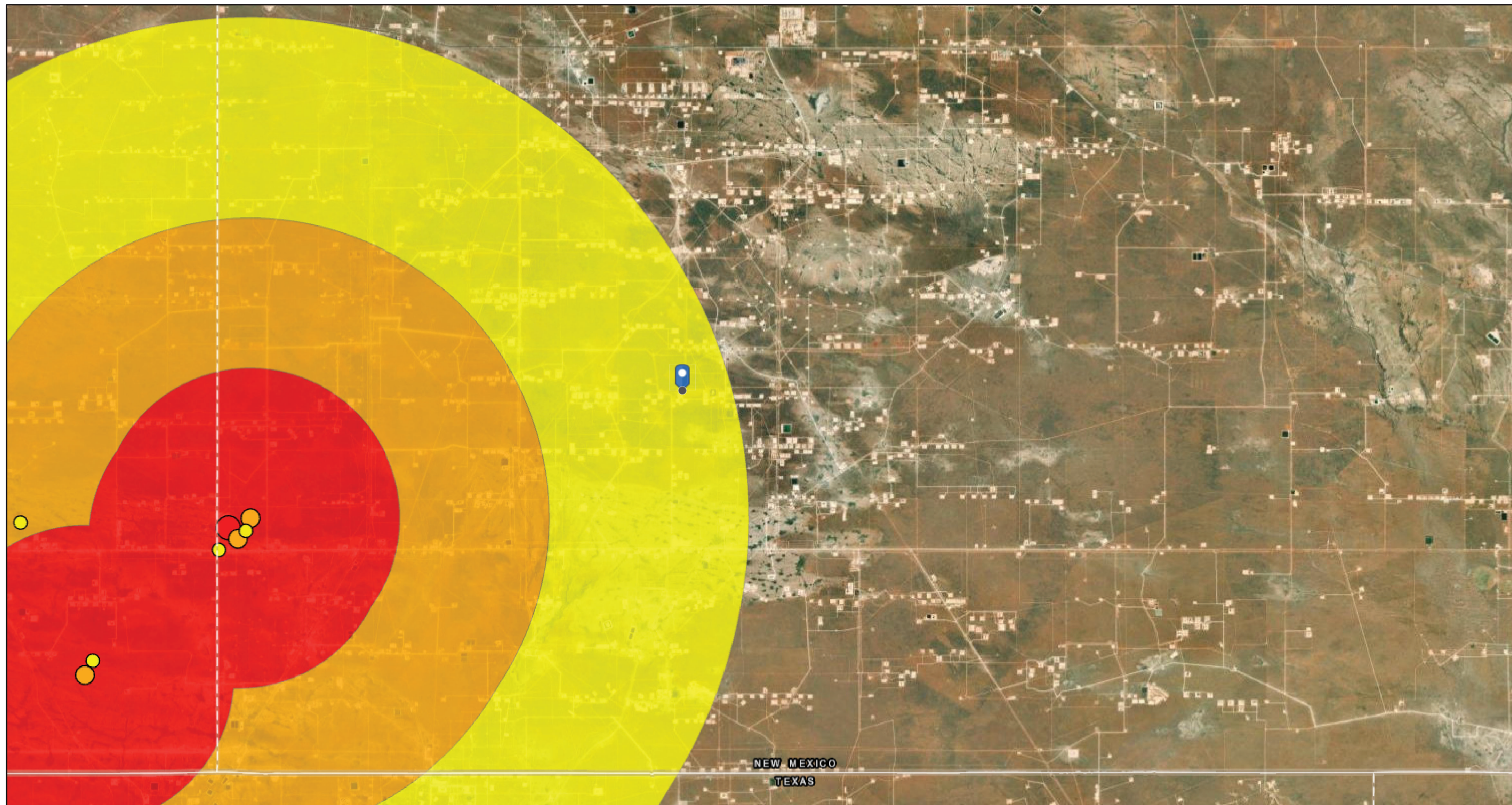
Land Ownership

- BLM
- P
- S



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

NM OCD - Induced Seismicity Map



10/29/2024, 7:49:26 AM

Seismic Response 3.0 to 3.4

3 mi.

6 mi.

10 mi.

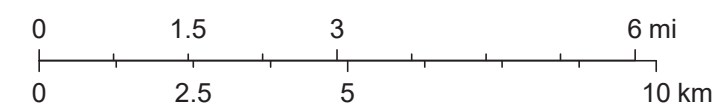
M2.5+ Earthquakes (2021+)

2.5 - 2.9

3.0 - 3.4

3.5 and above

1:144,448



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

National Flood Hazard Layer FIRMette



103°34'8"W 32°6'55"N



1:6,000

103°33'30"W 32°6'24"N

Basemap Imagery Source: USGS National Map 2023

Legend

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

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

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

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

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **10/29/2024 at 12:58 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.


Released to Imaging: 3/21/2025 2:12:30 PM

Received by OCD: 3/19/2025 9:03:09 AM



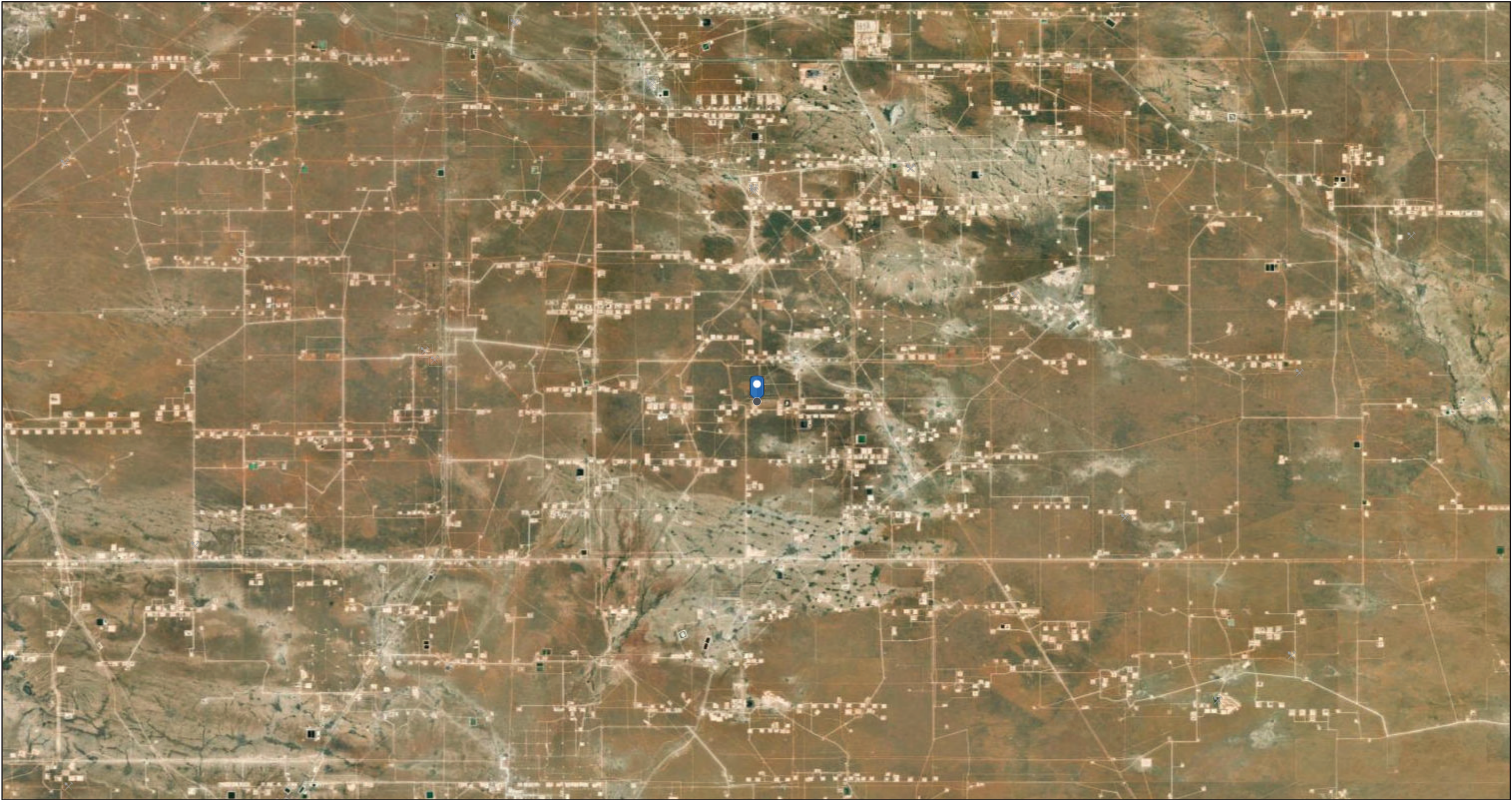
October 29, 2024

Wetlands

- | | | |
|--|---|--|
|  Estuarine and Marine Deepwater |  Freshwater Emergent Wetland |  Lake |
|  Estuarine and Marine Wetland |  Freshwater Forested/Shrub Wetland |  Other |
| |  Freshwater Pond |  Riverine |

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

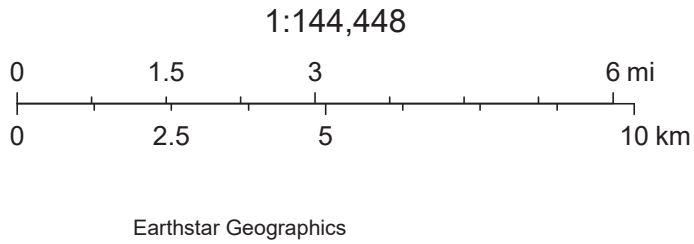
Active Mines in New Mexico



10/29/2024, 8:02:25 AM

Registered Mines

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



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

Release Location Name: Rojo 22-25 CTB

Date of Release: 10/27/2024

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

☒

Input Data:

If spill volumes from measurement, i.e. metering, tank volumes, etc. are known enter the volumes here: OIL: 0.0000 BBL WATER: 0.0000 BBL

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

Total Area Calculations

Standing Liquid Calculations

Total Area Calculations						Standing Liquid Calculations													
Total Surface Area	width		length	wet soil depth	oil (%)	Standing Liquid Area	width		length	liquid depth	oil (%)								
Rectangle Area #1	30.00	ft	X	50.00	ft	X	4.25	in	0.00%	Rectangle Area #1	30.00	ft	X	50.00	ft	X	0.25	in	0.00%
Rectangle Area #2	0.00	ft	X	0.00	ft	X	0.00	in	0.00%	Rectangle Area #2	0.00	ft	X	0.00	ft	X	0.00	in	0.00%
Rectangle Area #3	0.00	ft	X	0.00	ft	X	0.00	in	0.00%	Rectangle Area #3	0.00	ft	X	0.00	ft	X	0.00	in	0.00%
Rectangle Area #4	0.00	ft	X	0.00	ft	X	0.00	in	0.00%	Rectangle Area #4	0.00	ft	X	0.00	ft	X	0.00	in	0.00%
Rectangle Area #5	0.00	ft	X	0.00	ft	X	0.00	in	0.00%	Rectangle Area #5	0.00	ft	X	0.00	ft	X	0.00	in	0.00%
Rectangle Area #6	0.00	ft	X	0.00	ft	X	0.00	in	0.00%	Rectangle Area #6	0.00	ft	X	0.00	ft	X	0.00	in	0.00%
Rectangle Area #7	0.00	ft	X	0.00	ft	X	0.00	in	0.00%	Rectangle Area #7	0.00	ft	X	0.00	ft	X	0.00	in	0.00%
Rectangle Area #8	0.00	ft	X	0.00	ft	X	0.00	in	0.00%	Rectangle Area #8	0.00	ft	X	0.00	ft	X	0.00	in	0.00%

production system leak - DAILY PRODUCTION DATA REQUIRED

Average Daily Production: Oil _____ BBL Water _____ BBL

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

Amount of Free Liquid Recovered: 10 BBL okay

Percentage of Oil in Free Liquid Recovered: 0.00% (percentage)

Liquid holding factor *: 0.14 gal per gal

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

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

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

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

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

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

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

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

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

Saturated Soil Volume Calculations:

Total Solid/Liquid Volume: 1,500 sq. ft. H2O 531 cu. ft. OIL cu. ft.

Estimated Volumes Spilled

Liquid in Soil: 13.2 BBL 0.0 BBL
Free Liquid: 5.6 BBL 0.0 BBL
Totals: 18.8 BBL 0.0 BBL

Total Spill Liquid: 18.8 BBL 0.0 BBL

Recovered Volumes

Estimated oil recovered: 0.0 BBL check - okay
Estimated water recovered: 10.0 BBL check - okay

Free Liquid Volume Calculations:

Total Free Liquid Volume: 1,500 sq. ft. H2O 31 cu. ft. OIL cu. ft.

Estimated Production Volumes Lost

Estimated Production Spilled: 0.0 BBL 0.0 BBL

Estimated Surface Damage

Surface Area: 1,500 sq. ft.
Surface Area: .0344 acre

Estimated Weights, and Volumes

Saturated Soil = 59,500 lbs 531 cu.ft. 20 cu.yds.
Total Liquid = 19 BBL 790 gallon 6,573 lbs

APPENDIX C REGULATORY CORRESPONDENCE

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS

Action 404803

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 404803
	Action Type: [NOTIFY] Notification Of Sampling (C-141N)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2430254795
Incident Name	NAPP2430254795 ROJO 22-25 CTB @ 0
Incident Type	Produced Water Release
Incident Status	Initial C-141 Approved
Incident Facility	[fAPP2130123342] Rojo 22 - 25

Location of Release Source	
Site Name	Rojo 22-25 CTB
Date Release Discovered	10/27/2024
Surface Owner	Federal

Sampling Event General Information	
<i>Please answer all the questions in this group.</i>	
What is the sampling surface area in square feet	1,000
What is the estimated number of samples that will be gathered	11
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	11/01/2024
Time sampling will commence	11:00 AM
 Warning: Notification can not be less than two business days prior to conducting final sampling. 	
Please provide any information necessary for observers to contact samplers	Release assessment was conducted on November 1, 2024. Analytical results for all assessment samples were below reclamation limits and applicable site RRALs. subsequently this C-141N is being submitted retroactively.
Please provide any information necessary for navigation to sampling site	nicholas.poole@tetrattech.com (512) 560-9064

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

State of New Mexico

Energy, Minerals and Natural Resources

Oil Conservation Division

1220 S. St Francis Dr.

Santa Fe, NM 87505

CONDITIONS

Action 404803

CONDITIONS		
Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:	260297
	Action Number:	404803
	Action Type:	[NOTIFY] Notification Of Sampling (C-141N)

CONDITIONS

Created By	Condition	Condition Date
nicholas poole	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.	11/19/2024

Poole, Nicholas

From: OCDOnline@state.nm.us
Sent: Tuesday, December 24, 2024 12:33 PM
To: Poole, Nicholas
Subject: The Oil Conservation Division (OCD) has rejected the application, Application ID: 413578

⚠ 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 rejected the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAPP2430254795, for the following reasons:

- **Remediation closure denied for the following: 1) Delineation samples should be collected to the west and south of release point. 2) In order to use delineation grab samples for closure, a variance should be requested pursuant to 19.15.29.14 NMAC; otherwise “without division approval, the responsible party may elect to perform a composite and grab sample plan...where each composite sample is not representative of more than 200 square feet.” 3) Referencing the National Wetlands Inventory Mapper, the minimum distances to the following should be updated to 1-5 miles under Site Characterization: a playa lake, a wetland and significant watercourse. Submit remediation closure report to the OCD by 3/24/25.**

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 413578.

Please review and make the required correction(s) prior to resubmitting.

If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional C-141.

Thank you,
Shelly Wells
Environmental Specialist-A
505-469-7520
Shelly.Wells@emnrd.nm.gov

New Mexico Energy, Minerals and Natural Resources Department

1220 South St. Francis Drive
Santa Fe, NM 87505

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS

Action 420100

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 420100
	Action Type: [NOTIFY] Notification Of Sampling (C-141N)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2430254795
Incident Name	NAPP2430254795 ROJO 22-25 CTB @ 0
Incident Type	Produced Water Release
Incident Status	Initial C-141 Approved
Incident Facility	[fAPP2130123342] Rojo 22 - 25

Location of Release Source	
Site Name	ROJO 22-25 CTB
Date Release Discovered	10/27/2024
Surface Owner	Federal

Sampling Event General Information	
Please answer all the questions in this group.	
What is the sampling surface area in square feet	965
What is the estimated number of samples that will be gathered	2
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	01/16/2025
Time sampling will commence	10:00 AM
Please provide any information necessary for observers to contact samplers	Initial release assessment was conducted on November 1, 2024. all analytical results for samples were below reclamation limits and applicable site RRALs. in accordance with the rejected closure report comments. additional sampling will be conducted at the site.
Please provide any information necessary for navigation to sampling site	nicholas.poole@tetrattech.com (512) 560-9064

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/oed/contact-us>

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

CONDITIONS

Action 420100

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 420100
	Action Type: [NOTIFY] Notification Of Sampling (C-141N)

CONDITIONS

Created By	Condition	Condition Date
nicholas poole	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.	1/13/2025

From: OCDOnline@state.nm.us
To: [Allen, Samantha](#)
Subject: The Oil Conservation Division (OCD) has rejected the application, Application ID: 435408
Date: Thursday, March 13, 2025 10:18:28 AM

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

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

The OCD has rejected the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAPP2430254795, for the following reasons:

- **Remediation closure denied for the following:**
- **Two of the 12/24/24 reasons for rejection have not been addressed. The first is “In order to use delineation grab samples for closure, a variance should be requested pursuant to 19.15.29.14 NMAC; otherwise “without division approval, the responsible party may elect to perform a composite and grab sample plan...where each composite sample is not representative of more than 200 square feet.” You have not submitted a variance request or collected five point composite samples every 200 square feet within the entire release area. A surface scrape was performed. Pursuant to 19.15.29.12(D) NMAC, “the responsible party must test the remediated areas for contamination with representative five-point composite samples from the walls and base...”**
- **The second was to update the minimum distances to a playa lake, a wetland and a significant watercourse to 1-5 miles, both in the C-141 application itself and the report. You have updated them in your remediation closure report however the answers under the Site Characterization portion of the C-141 application have not been updated to reflect this.**
- **Resubmit remediation closure report to the OCD by 5/12/25.**

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 435408.

Please review and make the required correction(s) prior to resubmitting.

If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional C-141.

Thank you,
Shelly Wells
Environmental Specialist-A
505-469-7520
Shelly.Wells@emnrd.nm.gov

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

From: [Wells, Shelly, EMNRD](#)
To: [Allen, Samantha](#)
Cc: [Llull, Christian](#); [Poole, Nicholas](#)
Subject: RE: [EXTERNAL] Variance Request - Rojo 22-25 CTB (nAPP2430254795)
Date: Thursday, March 13, 2025 2:44:39 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

You don't often get email from shelly.wells@emnrd.nm.gov. [Learn why this is important](#)

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

Good afternoon Samantha,

For the release at NAPP2430254795 ROJO 22-25 CTB, a variance is approved to use the delineation grab samples previously collected for closure. Please include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

Kind regards,

Shelly

Shelly Wells * Environmental Specialist-Advanced
Environmental Bureau
EMNRD-Oil Conservation Division
1220 S. St. Francis Drive|Santa Fe, NM 87505
(505)469-7520 Shelly.Wells@emnrd.nm.gov
<http://www.emnrd.state.nm.us/OCD/>

From: Allen, Samantha <Samantha.allen@tetrattech.com>
Sent: Thursday, March 13, 2025 1:39 PM
To: Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>
Cc: Llull, Christian <Christian.Llull@tetrattech.com>; Poole, Nicholas <NICHOLAS.POOLE@tetrattech.com>
Subject: [EXTERNAL] Variance Request - Rojo 22-25 CTB (nAPP2430254795)

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

Shelly,

This correspondence recaps our previous discussion in the call today between TT and NMOCD regarding the Rojo 22-25 CTB (nAPP2430254795) Closure Report Rejection. As discussed, the closure request was rejected for this incident. The rationale was that a variance request was not submitted for the assessment samples collected at the release site. In our call, it was established that the report contained satisfactory information, however, the report had to be rejected, partially based on the lack of a variance. Also in the call, a variance was discussed to use delineation grab samples for closure, pursuant to 19.15.29.14 NMAC.

Thus, Tetra Tech, on behalf of BTA Oil, would like to request a variance to use delineation samples for the closure of the subject line incident.

Please let us know if you approve of this variance and if you have any questions or comments.

Thank you in advance.

Samantha Allen | Staff Environmental Scientist
Direct Mobile +1 (512) 788-2948 | Samantha.allen@tetrattech.com

Tetra Tech | *Leading with Science®* | OGA
8911 N. Capital of Texas Highway | Bldg. 2, Suite 2310 | Austin, TX 78759 | tetrattech.com

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Please consider the environment before printing. [Read more](#)

Adobe Systems



From: OCDOnline@state.nm.us <OCDOnline@state.nm.us>

Sent: Thursday, March 13, 2025 10:18 AM

To: Allen, Samantha <Samantha.allen@tetrattech.com>

Subject: The Oil Conservation Division (OCD) has rejected the application, Application ID: 435408

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

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

The OCD has rejected the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAPP2430254795, for the following reasons:

- **Remediation closure denied for the following:**
- **Two of the 12/24/24 reasons for rejection have not been addressed. The first is**

“In order to use delineation grab samples for closure, a variance should be requested pursuant to 19.15.29.14 NMAC; otherwise “without division approval, the responsible party may elect to perform a composite and grab sample plan...where each composite sample is not representative of more than 200 square feet.” You have not submitted a variance request or collected five point composite samples every 200 square feet within the entire release area. A surface scrape was performed. Pursuant to 19.15.29.12(D) NMAC, “the responsible party must test the remediated areas for contamination with representative five-point composite samples from the walls and base...”

- **The second was to update the minimum distances to a playa lake, a wetland and a significant watercourse to 1-5 miles, both in the C-141 application itself and the report. You have updated them in your remediation closure report however the answers under the Site Characterization portion of the C-141 application have not been updated to reflect this.**
- **Resubmit remediation closure report to the OCD by 5/12/25.**

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 435408.

Please review and make the required correction(s) prior to resubmitting.

If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional C-141.

Thank you,
Shelly Wells
Environmental Specialist-A
505-469-7520
Shelly.Wells@emnrd.nm.gov

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

APPENDIX D

Laboratory Analytical Data



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

November 07, 2024

NICHOLAS POOLE

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: ROJO 22-25 CTB

Enclosed are the results of analyses for samples received by the laboratory on 11/01/24 12:53.

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: 11/01/2024
 Reported: 11/07/2024
 Project Name: ROJO 22-25 CTB
 Project Number: ID:NAPP2430254785
 Project Location: BTA - LEA CO NM

Sampling Date: 11/01/2024
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Alyssa Parras

Sample ID: AH - 1 (0-1') (H246684-01)

BTEX 8021B		mg/kg	Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	11/06/2024	ND	1.69	84.7	2.00	14.0	
Toluene*	<0.050	0.050	11/06/2024	ND	1.85	92.6	2.00	9.20	
Ethylbenzene*	<0.050	0.050	11/06/2024	ND	2.07	104	2.00	5.44	
Total Xylenes*	<0.150	0.150	11/06/2024	ND	6.27	105	6.00	5.40	
Total BTEX	<0.300	0.300	11/06/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 117 % 71.5-134

Chloride, SM4500Cl-B		mg/kg	Analyzed By: CT						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	11/06/2024	ND	432	108	400	3.64	

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	11/05/2024	ND	205	103	200	1.38	
DRO >C10-C28*	<10.0	10.0	11/05/2024	ND	192	96.0	200	2.24	
EXT DRO >C28-C36	<10.0	10.0	11/05/2024	ND					

Surrogate: 1-Chlorooctane 123 % 48.2-134

Surrogate: 1-Chlorooctadecane 131 % 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: 11/01/2024
 Reported: 11/07/2024
 Project Name: ROJO 22-25 CTB
 Project Number: ID:NAPP2430254785
 Project Location: BTA - LEA CO NM

Sampling Date: 11/01/2024
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Alyssa Parras

Sample ID: AH - 2 (0-1') (H246684-02)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	11/06/2024	ND	1.69	84.7	2.00	14.0		
Toluene*	<0.050	0.050	11/06/2024	ND	1.85	92.6	2.00	9.20		
Ethylbenzene*	<0.050	0.050	11/06/2024	ND	2.07	104	2.00	5.44		
Total Xylenes*	<0.150	0.150	11/06/2024	ND	6.27	105	6.00	5.40		
Total BTEX	<0.300	0.300	11/06/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 101 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CT						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	64.0	16.0	11/06/2024	ND	432	108	400	3.64		

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	11/05/2024	ND	205	103	200	1.38	
DRO >C10-C28*	<10.0	10.0	11/05/2024	ND	192	96.0	200	2.24	
EXT DRO >C28-C36	<10.0	10.0	11/05/2024	ND					

Surrogate: 1-Chlorooctane 129 % 48.2-134

Surrogate: 1-Chlorooctadecane 135 % 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: 11/01/2024
 Reported: 11/07/2024
 Project Name: ROJO 22-25 CTB
 Project Number: ID:NAPP2430254785
 Project Location: BTA - LEA CO NM

Sampling Date: 11/01/2024
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Alyssa Parras

Sample ID: AH - 3 (0-1') (H246684-03)

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	11/06/2024	ND	1.95	97.7	2.00	10.5		
Toluene*	<0.050	0.050	11/06/2024	ND	1.91	95.3	2.00	9.42		
Ethylbenzene*	<0.050	0.050	11/06/2024	ND	1.99	99.6	2.00	10.6		
Total Xylenes*	<0.150	0.150	11/06/2024	ND	5.95	99.1	6.00	10.9		
Total BTEX	<0.300	0.300	11/06/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 112 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	11/07/2024	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	11/05/2024	ND	205	103	200	1.38	
DRO >C10-C28*	<10.0	10.0	11/05/2024	ND	192	96.0	200	2.24	
EXT DRO >C28-C36	<10.0	10.0	11/05/2024	ND					

Surrogate: 1-Chlorooctane 127 % 48.2-134

Surrogate: 1-Chlorooctadecane 132 % 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: 11/01/2024
 Reported: 11/07/2024
 Project Name: ROJO 22-25 CTB
 Project Number: ID:NAPP2430254785
 Project Location: BTA - LEA CO NM

Sampling Date: 11/01/2024
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Alyssa Parras

Sample ID: AH - 4 (0-1') (H246684-04)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	11/06/2024	ND	1.95	97.7	2.00	10.5	
Toluene*	<0.050	0.050	11/06/2024	ND	1.91	95.3	2.00	9.42	
Ethylbenzene*	<0.050	0.050	11/06/2024	ND	1.99	99.6	2.00	10.6	
Total Xylenes*	<0.150	0.150	11/06/2024	ND	5.95	99.1	6.00	10.9	
Total BTEX	<0.300	0.300	11/06/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 109 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	11/07/2024	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	11/05/2024	ND	205	103	200	1.38	
DRO >C10-C28*	<10.0	10.0	11/05/2024	ND	192	96.0	200	2.24	
EXT DRO >C28-C36	<10.0	10.0	11/05/2024	ND					

Surrogate: 1-Chlorooctane 122 % 48.2-134

Surrogate: 1-Chlorooctadecane 126 % 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: 11/01/2024
 Reported: 11/07/2024
 Project Name: ROJO 22-25 CTB
 Project Number: ID:NAPP2430254785
 Project Location: BTA - LEA CO NM

Sampling Date: 11/01/2024
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Alyssa Parras

Sample ID: AH - 5 (0-1') (H246684-05)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	11/06/2024	ND	1.95	97.7	2.00	10.5	
Toluene*	<0.050	0.050	11/06/2024	ND	1.91	95.3	2.00	9.42	
Ethylbenzene*	<0.050	0.050	11/06/2024	ND	1.99	99.6	2.00	10.6	
Total Xylenes*	<0.150	0.150	11/06/2024	ND	5.95	99.1	6.00	10.9	
Total BTEX	<0.300	0.300	11/06/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 113 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	224	16.0	11/07/2024	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	11/05/2024	ND	205	103	200	1.38	
DRO >C10-C28*	<10.0	10.0	11/05/2024	ND	192	96.0	200	2.24	
EXT DRO >C28-C36	<10.0	10.0	11/05/2024	ND					

Surrogate: 1-Chlorooctane 121 % 48.2-134

Surrogate: 1-Chlorooctadecane 127 % 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: 11/01/2024
 Reported: 11/07/2024
 Project Name: ROJO 22-25 CTB
 Project Number: ID:NAPP2430254785
 Project Location: BTA - LEA CO NM

Sampling Date: 11/01/2024
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Alyssa Parras

Sample ID: AH - 5 (2-3') (H246684-06)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	11/06/2024	ND	1.95	97.7	2.00	10.5		
Toluene*	<0.050	0.050	11/06/2024	ND	1.91	95.3	2.00	9.42		
Ethylbenzene*	<0.050	0.050	11/06/2024	ND	1.99	99.6	2.00	10.6		
Total Xylenes*	<0.150	0.150	11/06/2024	ND	5.95	99.1	6.00	10.9		
Total BTEX	<0.300	0.300	11/06/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 111 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	11/07/2024	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	11/05/2024	ND	205	103	200	1.38	
DRO >C10-C28*	<10.0	10.0	11/05/2024	ND	192	96.0	200	2.24	
EXT DRO >C28-C36	<10.0	10.0	11/05/2024	ND					

Surrogate: 1-Chlorooctane 116 % 48.2-134

Surrogate: 1-Chlorooctadecane 121 % 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: 11/01/2024
 Reported: 11/07/2024
 Project Name: ROJO 22-25 CTB
 Project Number: ID:NAPP2430254785
 Project Location: BTA - LEA CO NM

Sampling Date: 11/01/2024
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Alyssa Parras

Sample ID: AH - 6 (0-1') (H246684-07)

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	11/06/2024	ND	1.95	97.7	2.00	10.5		
Toluene*	<0.050	0.050	11/06/2024	ND	1.91	95.3	2.00	9.42		
Ethylbenzene*	<0.050	0.050	11/06/2024	ND	1.99	99.6	2.00	10.6		
Total Xylenes*	<0.150	0.150	11/06/2024	ND	5.95	99.1	6.00	10.9		
Total BTEX	<0.300	0.300	11/06/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 109 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	112	16.0	11/07/2024	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	11/06/2024	ND	205	103	200	1.38	
DRO >C10-C28*	<10.0	10.0	11/06/2024	ND	192	96.0	200	2.24	
EXT DRO >C28-C36	<10.0	10.0	11/06/2024	ND					

Surrogate: 1-Chlorooctane 95.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 95.1 % 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: 11/01/2024
 Reported: 11/07/2024
 Project Name: ROJO 22-25 CTB
 Project Number: ID:NAPP2430254785
 Project Location: BTA - LEA CO NM

Sampling Date: 11/01/2024
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Alyssa Parras

Sample ID: AH - 6 (2-3') (H246684-08)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	11/06/2024	ND	1.95	97.7	2.00	10.5		
Toluene*	<0.050	0.050	11/06/2024	ND	1.91	95.3	2.00	9.42		
Ethylbenzene*	<0.050	0.050	11/06/2024	ND	1.99	99.6	2.00	10.6		
Total Xylenes*	<0.150	0.150	11/06/2024	ND	5.95	99.1	6.00	10.9		
Total BTEX	<0.300	0.300	11/06/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 113 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	224	16.0	11/07/2024	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	11/05/2024	ND	205	103	200	1.38	
DRO >C10-C28*	<10.0	10.0	11/05/2024	ND	192	96.0	200	2.24	
EXT DRO >C28-C36	<10.0	10.0	11/05/2024	ND					

Surrogate: 1-Chlorooctane 101 % 48.2-134

Surrogate: 1-Chlorooctadecane 104 % 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: 11/01/2024
 Reported: 11/07/2024
 Project Name: ROJO 22-25 CTB
 Project Number: ID:NAPP2430254785
 Project Location: BTA - LEA CO NM

Sampling Date: 11/01/2024
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Alyssa Parras

Sample ID: AH - 7 (0-1') (H246684-09)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	11/06/2024	ND	1.95	97.7	2.00	10.5		
Toluene*	<0.050	0.050	11/06/2024	ND	1.91	95.3	2.00	9.42		
Ethylbenzene*	<0.050	0.050	11/06/2024	ND	1.99	99.6	2.00	10.6		
Total Xylenes*	<0.150	0.150	11/06/2024	ND	5.95	99.1	6.00	10.9		
Total BTEX	<0.300	0.300	11/06/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 109 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	11/07/2024	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	11/05/2024	ND	205	103	200	1.38	
DRO >C10-C28*	<10.0	10.0	11/05/2024	ND	192	96.0	200	2.24	
EXT DRO >C28-C36	<10.0	10.0	11/05/2024	ND					

Surrogate: 1-Chlorooctane 126 % 48.2-134

Surrogate: 1-Chlorooctadecane 131 % 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: 11/01/2024
 Reported: 11/07/2024
 Project Name: ROJO 22-25 CTB
 Project Number: ID:NAPP2430254785
 Project Location: BTA - LEA CO NM

Sampling Date: 11/01/2024
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Alyssa Parras

Sample ID: AH - 7 (2-3') (H246684-10)

BTX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	11/06/2024	ND	1.95	97.7	2.00	10.5		
Toluene*	<0.050	0.050	11/06/2024	ND	1.91	95.3	2.00	9.42		
Ethylbenzene*	<0.050	0.050	11/06/2024	ND	1.99	99.6	2.00	10.6		
Total Xylenes*	<0.150	0.150	11/06/2024	ND	5.95	99.1	6.00	10.9		
Total BTX	<0.300	0.300	11/06/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 115 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	11/07/2024	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	11/05/2024	ND	205	103	200	1.38	
DRO >C10-C28*	<10.0	10.0	11/05/2024	ND	192	96.0	200	2.24	
EXT DRO >C28-C36	<10.0	10.0	11/05/2024	ND					

Surrogate: 1-Chlorooctane 124 % 48.2-134

Surrogate: 1-Chlorooctadecane 129 % 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: 11/01/2024
 Reported: 11/07/2024
 Project Name: ROJO 22-25 CTB
 Project Number: ID:NAPP2430254785
 Project Location: BTA - LEA CO NM

Sampling Date: 11/01/2024
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Alyssa Parras

Sample ID: AH - 8 (0-1') (H246684-11)

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	11/06/2024	ND	1.95	97.7	2.00	10.5		
Toluene*	<0.050	0.050	11/06/2024	ND	1.91	95.3	2.00	9.42		
Ethylbenzene*	<0.050	0.050	11/06/2024	ND	1.99	99.6	2.00	10.6		
Total Xylenes*	<0.150	0.150	11/06/2024	ND	5.95	99.1	6.00	10.9		
Total BTEX	<0.300	0.300	11/06/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 110 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	176	16.0	11/07/2024	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	11/05/2024	ND	205	103	200	1.38	
DRO >C10-C28*	<10.0	10.0	11/05/2024	ND	192	96.0	200	2.24	
EXT DRO >C28-C36	<10.0	10.0	11/05/2024	ND					

Surrogate: 1-Chlorooctane 130 % 48.2-134

Surrogate: 1-Chlorooctadecane 136 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

- S-05 The surrogate recovery is outside of lab established statistical control limits but still within method limits. Data is not adversely affected.
- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- ** Samples not received at proper temperature of 6°C or below.
- *** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
Samples reported on an as received basis (wet) unless otherwise noted on report

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A handwritten signature in black ink, appearing to read "Celey D. Keene", written over a horizontal line.

Celey D. Keene, Lab Director/Quality Manager



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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

1 of 2

Company Name: <u>Petra Tech</u>		P.O. #:		BILL TO		ANALYSIS REQUEST																																	
Project Manager: <u>Michelle Moore</u>		City: _____ State: _____ Zip: _____		Company: <u>PTA</u>																																			
Address: _____		City: _____ State: _____ Zip: _____		Attn: <u>Ray Ramos</u>																																			
Phone #: _____ Fax #: _____		City: _____ State: _____ Zip: _____		Address: _____																																			
Project #: <u>2021-11-11-24-30-54765</u>		Project Owner: _____		City: _____ State: _____ Zip: _____																																			
Project Name: <u>Root 22-25 CTB</u>		Project Location: <u>Lea County</u>		State: _____ Zip: _____																																			
Sample Name: <u>A. Roberts Sanchez</u>		Phone #: _____ Fax #: _____		City: _____ State: _____ Zip: _____																																			
FOR LAB USE ONLY		DATE		TIME																																			
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											
11/1/24		AH-1 (C 0-1')										X														11/1/24		8:05		TPH (D 100 / GR 0 / 0.0)									
2		AH-2 (C 0-1')																								8:15		X											
3		AH-3 (C 0-1')																								8:30		X											
4		AH-4 (C 0-1')																								8:40		X											
5		AH-5 (C 0-1')																								9:05													
6		AH-6 (C 0-1')																								9:20													
7		AH-7 (C 0-1')																								9:30													
8		AH-8 (C 0-1')																								9:50													
9		AH-9 (C 0-1')																								10:10													
10		AH-10 (C 0-1')																								10:30													
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Relinquished By: <u>A. Roberts Sanchez</u>		Date: <u>11/1/24</u>		Time: _____		Received By: <u>ASANCHEZ</u>		Date: <u>11/1/24</u>		Time: _____		Verbal Result: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Add'l Phone #:		All Results are emailed. Please provide Email address:																									
Relinquished By: _____		Date: _____		Time: _____		Received By: _____		Date: _____		Time: _____		REMARKS:																											
Delivered By: (Circle One)		Observed Temp. °C		Corrected Temp. °C		Sample Condition		CHECKED BY: (Initials)		Turnaround Time:		Standard <input checked="" type="checkbox"/> Rush <input type="checkbox"/>		Bacteria (only) Sample Condition																									
Sampler - UPS - Bus - Other:		Cool <input type="checkbox"/> Intact <input type="checkbox"/>		Cool <input type="checkbox"/> Intact <input type="checkbox"/>		Cool <input type="checkbox"/> Intact <input type="checkbox"/>		Cool <input type="checkbox"/> Intact <input type="checkbox"/>		Cool <input type="checkbox"/> Intact <input type="checkbox"/>		Cool <input type="checkbox"/> Intact <input type="checkbox"/>		Cool <input type="checkbox"/> Intact <input type="checkbox"/>																									
Thermometer ID #140		Correction Factor -0.5°C		Correction Factor -0.5°C		Correction Factor -0.5°C		Correction Factor -0.5°C		Correction Factor -0.5°C		Correction Factor -0.5°C		Correction Factor -0.5°C																									

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



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(575) 393-2326 FAX (575) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]



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

January 23, 2025

NICHOLAS POOLE

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: ROJO 22-25 CTB

Enclosed are the results of analyses for samples received by the laboratory on 01/17/25 10:37.

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: 01/17/2025
 Reported: 01/23/2025
 Project Name: ROJO 22-25 CTB
 Project Number: 212C-MD-03639
 Project Location: BTA - LEA CO NM

Sampling Date: 01/16/2025
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Alyssa Parras

Sample ID: AH-9@1' (H250279-01)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	01/21/2025	ND	1.95	97.4	2.00	3.06		
Toluene*	<0.050	0.050	01/21/2025	ND	2.05	103	2.00	3.57		
Ethylbenzene*	<0.050	0.050	01/21/2025	ND	2.06	103	2.00	3.20		
Total Xylenes*	<0.150	0.150	01/21/2025	ND	6.07	101	6.00	3.48		
Total BTEx	<0.300	0.300	01/21/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 102 % 71.5-134

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	01/21/2025	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	01/20/2025	ND	212	106	200	0.714	
DRO >C10-C28*	<10.0	10.0	01/20/2025	ND	207	103	200	2.03	
EXT DRO >C28-C36	<10.0	10.0	01/20/2025	ND					

Surrogate: 1-Chlorooctane 90.8 % 48.2-134

Surrogate: 1-Chlorooctadecane 86.7 % 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: 01/17/2025
 Reported: 01/23/2025
 Project Name: ROJO 22-25 CTB
 Project Number: 212C-MD-03639
 Project Location: BTA - LEA CO NM

Sampling Date: 01/16/2025
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Alyssa Parras

Sample ID: AH-10@1' (H250279-02)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	01/21/2025	ND	2.02	101	2.00	4.02		
Toluene*	<0.050	0.050	01/21/2025	ND	2.15	107	2.00	4.88		
Ethylbenzene*	<0.050	0.050	01/21/2025	ND	2.21	111	2.00	5.67		
Total Xylenes*	<0.150	0.150	01/21/2025	ND	6.73	112	6.00	5.11		
Total BTEX	<0.300	0.300	01/21/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 113 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: KV						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	01/21/2025	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	01/20/2025	ND	212	106	200	0.714	
DRO >C10-C28*	<10.0	10.0	01/20/2025	ND	207	103	200	2.03	
EXT DRO >C28-C36	<10.0	10.0	01/20/2025	ND					

Surrogate: 1-Chlorooctane 97.5 % 48.2-134

Surrogate: 1-Chlorooctadecane 91.9 % 49.1-148

Cardinal Laboratories

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Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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

Celey D. Keene, Lab Director/Quality Manager

Analysis Request of Chain of Custody Record



Tetra Tech, Inc.

901 West Wall St, Suite 100
Midland, Texas 79701
Tel (432) 682-4559
Fax (432) 682-3946

Client Name:

BTA

Site Manager:

archibalds Rade

Project Name:

Ac 50 22-25 C573

Contact Info:

nicholas.rade@tetra-tech.com

Project Location:
(county, state)

LEA County

Project #:

212C-MD-05688

Invoice to:

BTA Ray Ramos

Receiving Laboratory:

Cardinal Laboratories

Sampler Signature:

Erin Sandoz

Comments:

SAMPLE IDENTIFICATION

LAB #
(LAB USE ONLY)

SAMPLING
YEAR
DATE
TIME

MATRIX
WATER
SOIL
HCL
HNO₃
ICE
PRESERVATIVE
METHOD

CONTAINERS
FILTERED (Y/N)

BTEX 8021B

TPH TX1005 (Ext to C35)

TPH 8015M (GRO - DRO - ORO)

PAH 8270C

Total Metals Ag As Ba Cd Cr Pb Se Hg

TCLP Metals Ag As Ba Cd Cr Pb Se Hg

TCLP Volatiles

TCLP Semi Volatiles

RCI

GC/MS Vol. 8260B / 624

GC/MS Semi. Vol. 8270C/625

PCB's 8082 / 608

NORM

PLM (Asbestos)

Chloride 500.0 4500

Chloride Sulfate TDS

General Water Chemistry (see attached list)

Anion/Cation Balance

Asbestos

Hold

ANALYSIS REQUEST

(Circle or Specify Method No.)

LAB USE ONLY

REMARKS:

Standard TAT

☐ RUSH: Same Day 24 hr 48 hr 72 hr

☐ Rush Charges Authorized

☐ Special Report Limits or TRRP Report

Sample Temperature

0.4°C-0.6°C

0.01 #140

(Circle) HAND DELIVERED FEDEX UPS Tracking #:

ORIGINAL COPY

APPENDIX E

Photographic Documentation



TETRA TECH, INC. PROJECT NO. 212C-MD-03684	DESCRIPTION	View northwest of site signage. Rojo 22H-25H.	1
	SITE NAME	Rojo 22-25 CTB @ 0 Release	10/29/2024



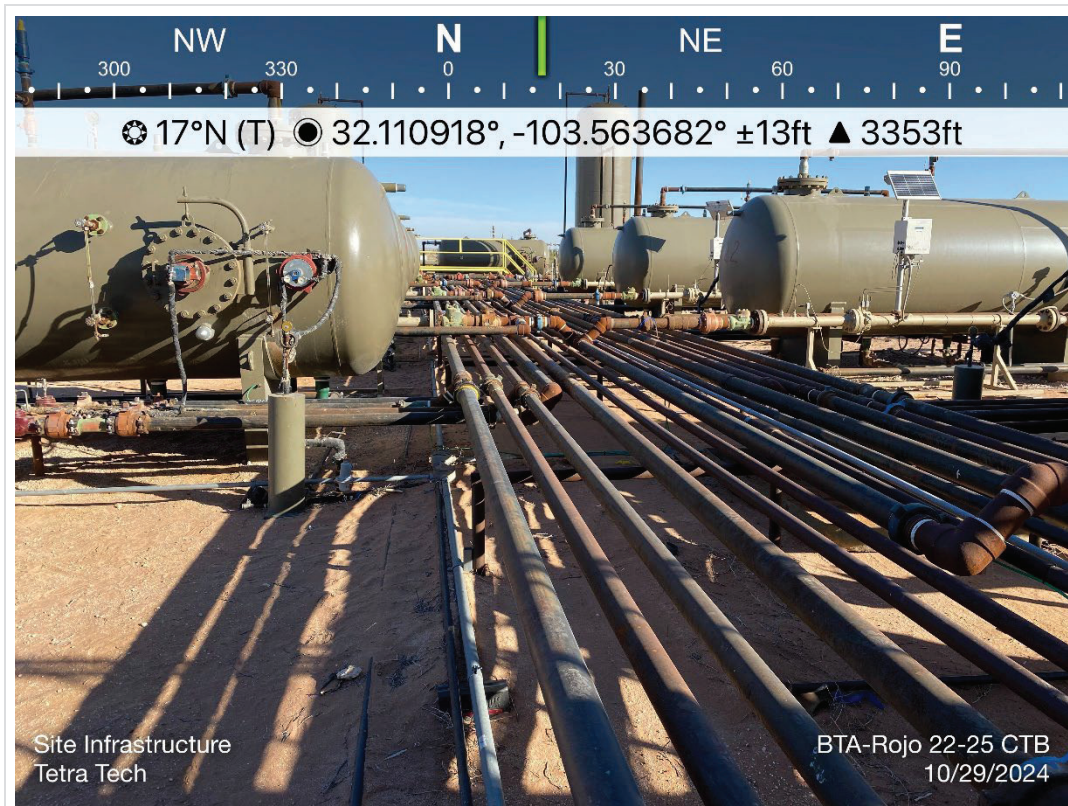
TETRA TECH, INC. PROJECT NO. 212C-MD-03684	DESCRIPTION	View of approximate release extent.	2
	SITE NAME	Rojo 22-25 CTB @ 0 Release	N/A



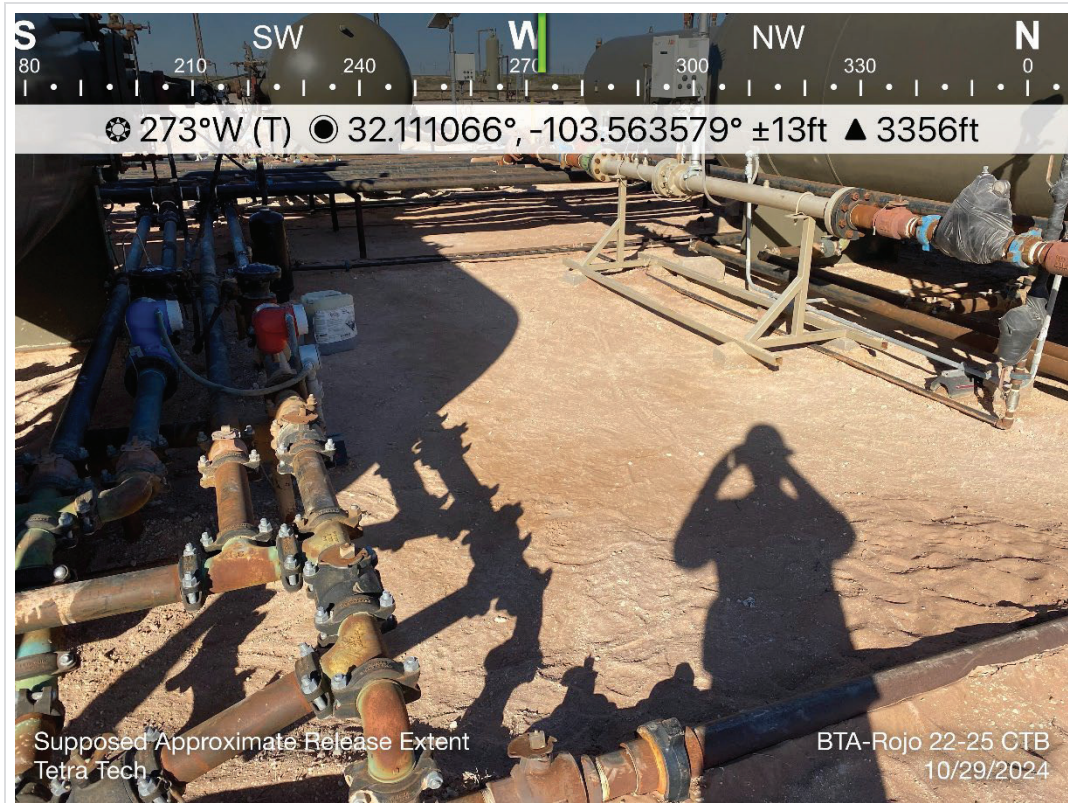
TETRA TECH, INC. PROJECT NO. 212C-MD-03684	DESCRIPTION	View of approximate release extent. Mass of flowlines.	3
	SITE NAME	Rojo 22-25 CTB @ 0 Release	N/A



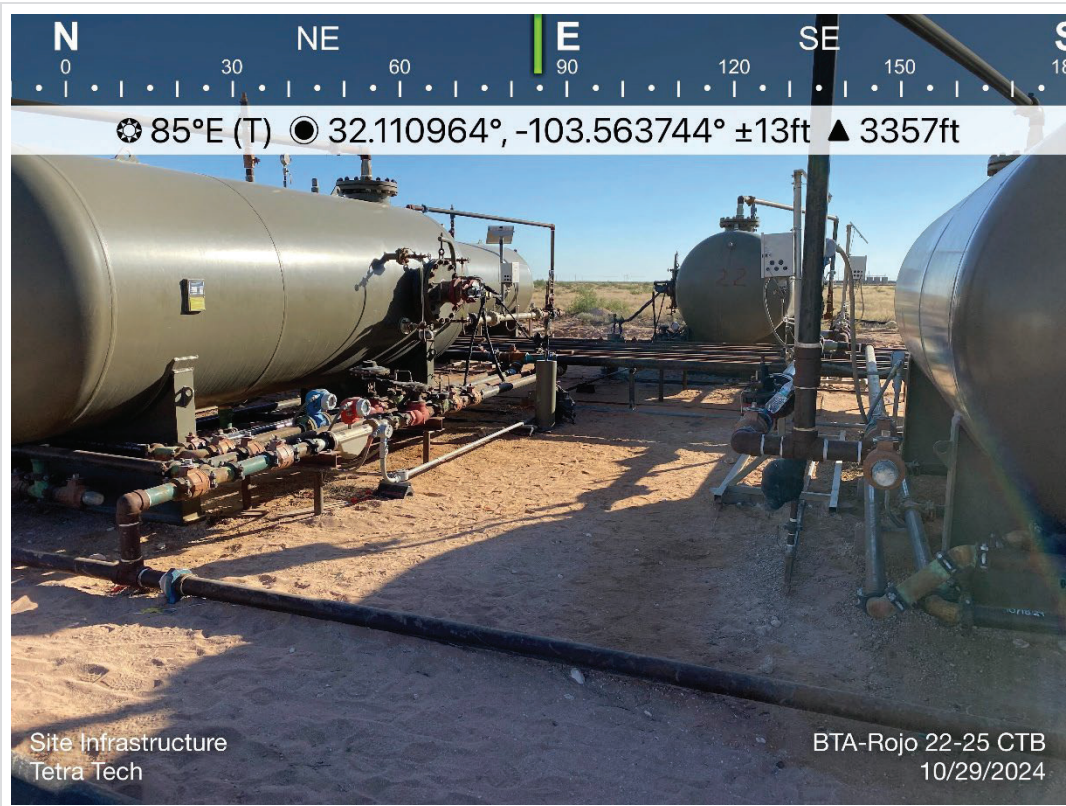
TETRA TECH, INC. PROJECT NO. 212C-MD-03684	DESCRIPTION	View of approximate release extent. Mass of flowlines.	4
	SITE NAME	Rojo 22-25 CTB @ 0 Release	N/A



TETRA TECH, INC. PROJECT NO. 212C-MD-03684	DESCRIPTION	View north-northeast of site infrastructure. View of the approximate release area.	5
	SITE NAME	Rojo 22-25 CTB @ 0 Release	10/29/2024



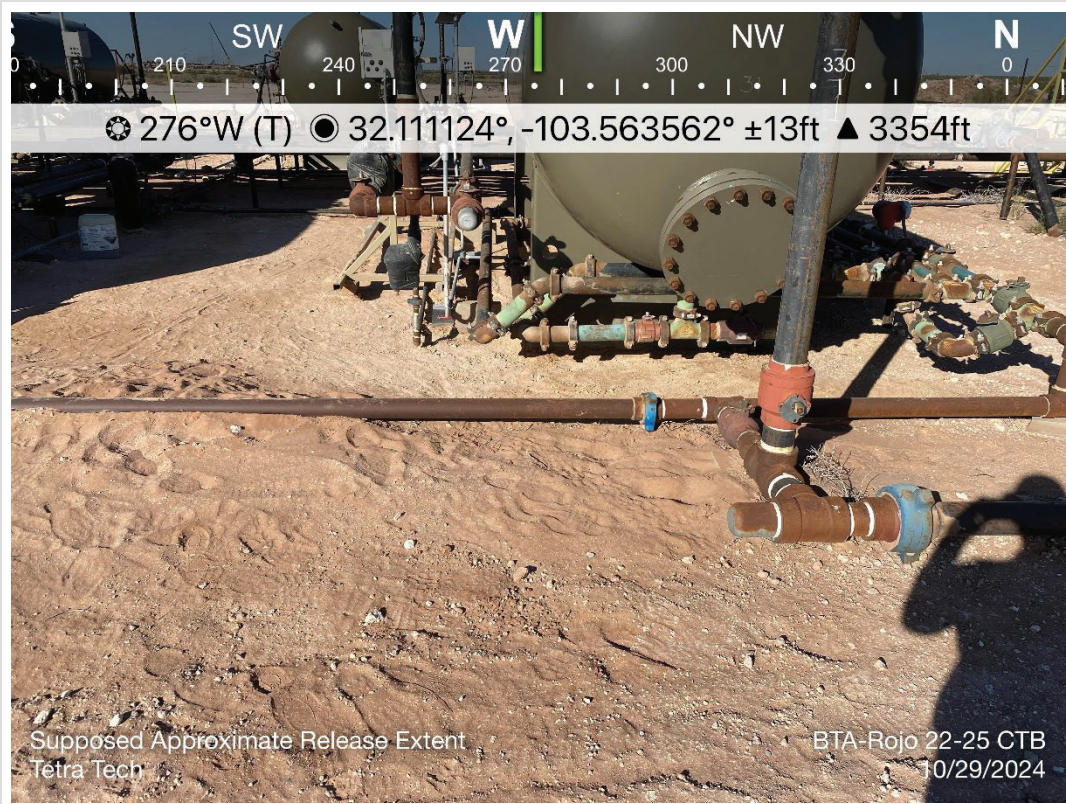
TETRA TECH, INC. PROJECT NO. 212C-MD-03684	DESCRIPTION	View west of site infrastructure. View of the approximate release area.	6
	SITE NAME	Rojo 22-25 CTB @ 0 Release	10/29/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03684	DESCRIPTION	View east of site infrastructure. View of the approximate release area.	7
	SITE NAME	Rojo 22-25 CTB @ 0 Release	10/29/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03684	DESCRIPTION	View southwest of site infrastructure. View of the approximate release area.	8
	SITE NAME	Rojo 22-25 CTB @ 0 Release	10/29/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03684	DESCRIPTION	View west of site infrastructure. View of the approximate release area.	9
	SITE NAME	Rojo 22-25 CTB @ 0 Release	10/29/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03684	DESCRIPTION	View of approximate release area post initial response activities.	10
	SITE NAME	Rojo 22-25 CTB @ 0 Release	N/A



TETRA TECH, INC. PROJECT NO. 212C-MD-03684	DESCRIPTION	View of approximate release area post initial response activities.	11
	SITE NAME	Rojo 22-25 CTB @ 0 Release	N/A



TETRA TECH, INC. PROJECT NO. 212C-MD-03684	DESCRIPTION	View of approximate release area post initial response activities.	12
	SITE NAME	Rojo 22-25 CTB @ 0 Release	N/A



TETRA TECH, INC. PROJECT NO. 212C-MD-03684	DESCRIPTION	View of approximate release area post initial response activities.	13
	SITE NAME	Rojo 22-25 CTB @ 0 Release	N/A

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

QUESTIONS

Action 443794

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 443794
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2430254795
Incident Name	NAPP2430254795 ROJO 22-25 CTB @ 0
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2130123342] Rojo 22 - 25

Location of Release Source	
Please answer all the questions in this group.	
Site Name	ROJO 22-25 CTB
Date Release Discovered	10/27/2024
Surface Owner	Federal

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: Corrosion Pipeline (Any) Produced Water Released: 19 BBL Recovered: 10 BBL Lost: 9 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)	The release occurred at approximately 1:00 am MDT on October 27, 2024. The release occurred due to a hole at a tee on a main water line. Approximately 18.7 bbls of produce water were released, of which 10 bbls of produced water was recovered.

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QUESTIONS, Page 2

Action 443794

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 443794
	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	No
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	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	<i>Not answered.</i>

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: Samantha Allen Title: Tetrattech Email: Samantha.allen@tetrattech.com Date: 03/19/2025
--	---

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QUESTIONS, Page 3

Action 443794

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:
	260297
	Action Number:
	443794
Action Type:	
[C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

QUESTIONS**Site Characterization**

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 75 and 100 (ft.)
What method was used to determine the depth to ground water	OCD Imaging Records Lookup
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	Between 1 and 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Greater than 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1 and 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan

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

Requesting a remediation plan approval with this submission	Yes
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	No

Soil Contamination Sampling: (Provide the highest observable value for each, in milligrams per kilograms.)

Chloride (EPA 300.0 or SM4500 Cl B)	224
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	0
GRO+DRO (EPA SW-846 Method 8015M)	0
BTEX (EPA SW-846 Method 8021B or 8260B)	0
Benzene (EPA SW-846 Method 8021B or 8260B)	0

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	11/06/2024
On what date will (or did) the final sampling or liner inspection occur	01/17/2025
On what date will (or was) the remediation complete(d)	01/17/2025
What is the estimated surface area (in square feet) that will be reclaimed	0
What is the estimated volume (in cubic yards) that will be reclaimed	0
What is the estimated surface area (in square feet) that will be remediated	216
What is the estimated volume (in cubic yards) that will be remediated	2

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 443794

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 443794
	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:	
<i>(Select all answers below that apply.)</i>	
(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for off-site disposal	OWL LANDFILL JAL [fJEG1635837366]
OR which OCD approved well (API) will be used for off-site disposal	Not answered.
OR is the off-site disposal site, to be used, out-of-state	Not answered.
OR is the off-site disposal site, to be used, an NMED facility	Not answered.
(Ex Situ) Excavation and on-site remediation (i.e. On-Site Land Farms)	Not answered.
(In Situ) Soil Vapor Extraction	Not answered.
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	Not answered.
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	Not answered.
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	Not answered.
Ground Water Abatement pursuant to 19.15.30 NMAC	Not answered.
OTHER (Non-listed remedial process)	Not answered.
<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: Samantha Allen Title: Tetrattech Email: Samantha.allen@tetrattech.com Date: 03/19/2025
<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 5

Action 443794

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 443794
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Deferral Requests Only	
Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

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QUESTIONS, Page 6

Action 443794

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:
	260297
	Action Number:
	443794
Action Type:	
[C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	420100
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	01/16/2025
What was the (estimated) number of samples that were to be gathered	2
What was the sampling surface area in square feet	965

Remediation Closure Request	
<i>Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.</i>	
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	No
All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion	Yes
What was the total surface area (in square feet) remediated	216
What was the total volume (cubic yards) remediated	2
All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX, and 10 mg/kg Benzene	Yes
What was the total surface area (in square feet) reclaimed	0
What was the total volume (in cubic yards) reclaimed	0
Summarize any additional remediation activities not included by answers (above)	Based on the results of the initial site assessment, initial response, supplemental assessment, and the approved variance request, BTA respectfully requests closure of the incident. The current release footprint is fully delineated. All analytical results associated with the site sampling event were below applicable Site RRALs following the initial response actions; therefore, remediation of the on-pad release footprint is complete.
<i>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>	
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: Samantha Allen Title: Tetrattech Email: Samantha.allen@tetrattech.com Date: 03/19/2025

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QUESTIONS, Page 7

Action 443794

QUESTIONS (continued)

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	Action Number: 443794
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Reclamation Report	
Only answer the questions in this group if all reclamation steps have been completed.	
Requesting a reclamation approval with this submission	No

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CONDITIONS

Action 443794

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 443794
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
scwells	Remediation closure approved.	3/21/2025