



701 Tradewinds, Suite C  
Midland, Texas 79706  
Tel. 432.685.3898  
www.ntglobal.com

August 28, 2020

NRM2025461364

Mrs. Victoria Venegas  
Engineering Tech III  
New Mexico Oil Conservation Division  
811 S. First St.  
Artesia, New Mexico 88210

Re: Closure Request Report  
Caza Operating, LLC  
Igloo 19 State Central Tank Battery  
Unit Letter O, Section 19, Township 20 South, Range 35 East  
Lea County, New Mexico

Dear Mrs. Venegas:

NTG Environmental, LLC (NTGE) was contacted by Caza Operating, LLC (Caza) to assess a release from a "T" fitting on an interconnecting pipeline located at Unit Letter O, Section 19, Township 20 South, Range 35 East, in Lea County, New Mexico. The release is located approximately 22.9 miles southwest of Hobbs, New Mexico at coordinates 32.556641°N and -103.499032°W (Figures 1 and 2).

### **Release Description and Response**

Caza discovered the produced water release, resulting from a pipe fitting failure, on August 13, 2020. Approximately ten (10) barrels (bbls) of produced water was released inside the lined tank battery. Upon discovery, Caza utilized a vacuum truck to recover the ten (10) bbls of free fluid and hauled it to disposal. The release area is shown on Figure 3.

### **Regulatory Guidelines**

On August 14, 2018, the State of New Mexico replaced sections 1 through 11 of 19.15.29 of the New Mexico Administrative Code (NMAC) and revised the cleanup levels for minor releases based on structural integrity of plastic liners inside of facilities, and the liner's ability to contain the leak in question. The revised NMAC codes dictate that the responsible party has 15 days of discovery of a release to notify the appropriate division in writing via Form C-141, and 2 days to notify the appropriate division of the visual inspection of the liner of the facility in question on which the release occurred.

The initial C-141 form is enclosed in Appendix A.

Mrs. Victoria Venegas  
August 28, 2020  
Page 2 of 2

### **Site Inspection**

On August 19, 2020, NTGE conducted a visual inspection of the exposed liner within the secondary containment of the tank battery. Upon inspection, the high-density polyethylene (HDPE) liner appeared to be structurally sound with no signs of poor integrity (i.e., cracks, tears, holes, etc.). There was also no evidence of any produced water along the outside of the battery's containment indicating no seepage occurred and that the secondary containment was intact and able to hold all fluids from the release. No pea gravel was utilized within the tank battery and no samples were collected from the base of the containment to avoid any breaching of the exposed liner.

A photolog is included in appendix B of this report.

### **Conclusion**

Caza has demonstrated that the exposed liner within the facility is intact and was able to withhold all liquids from the release that occurred on August 13, 2020. Based on the assessment and the visual inspection of the liner performed at this site, Caza respectfully requests that NMOCD consider closure of this release. If you have any questions or comments concerning the assessment or the remediation activities for this site, please call me at (432) 685-3898.

Sincerely,  
**NTG Environmental**



Clint Merritt  
Project Manager



Gordon Banks, REM, CSEM  
Senior Project Manager

Cc: Kevin Garrett, Caza

Attachments: Figures  
Appendix A – C-141  
Appendix B – Photolog

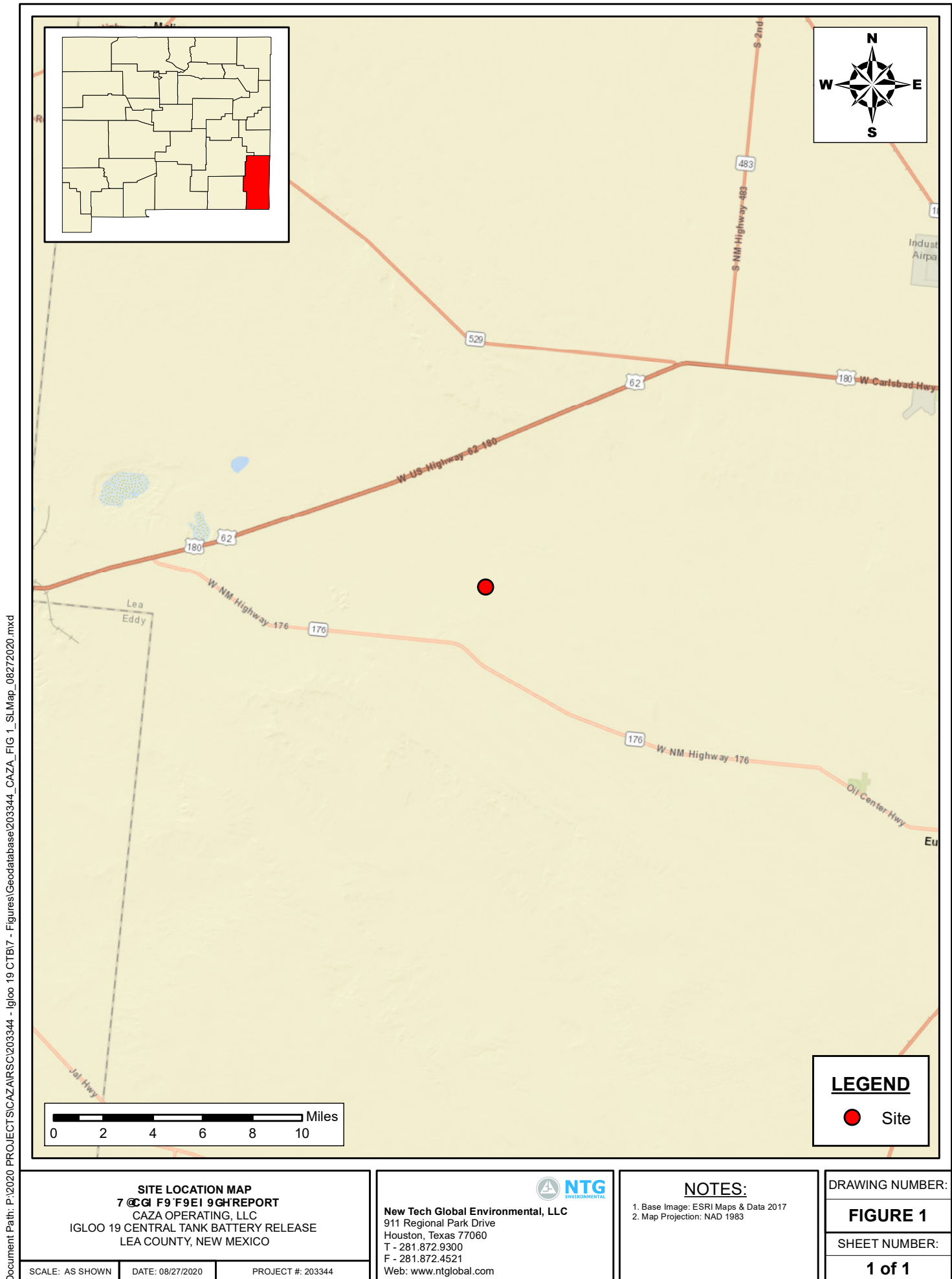
## FIGURES

---

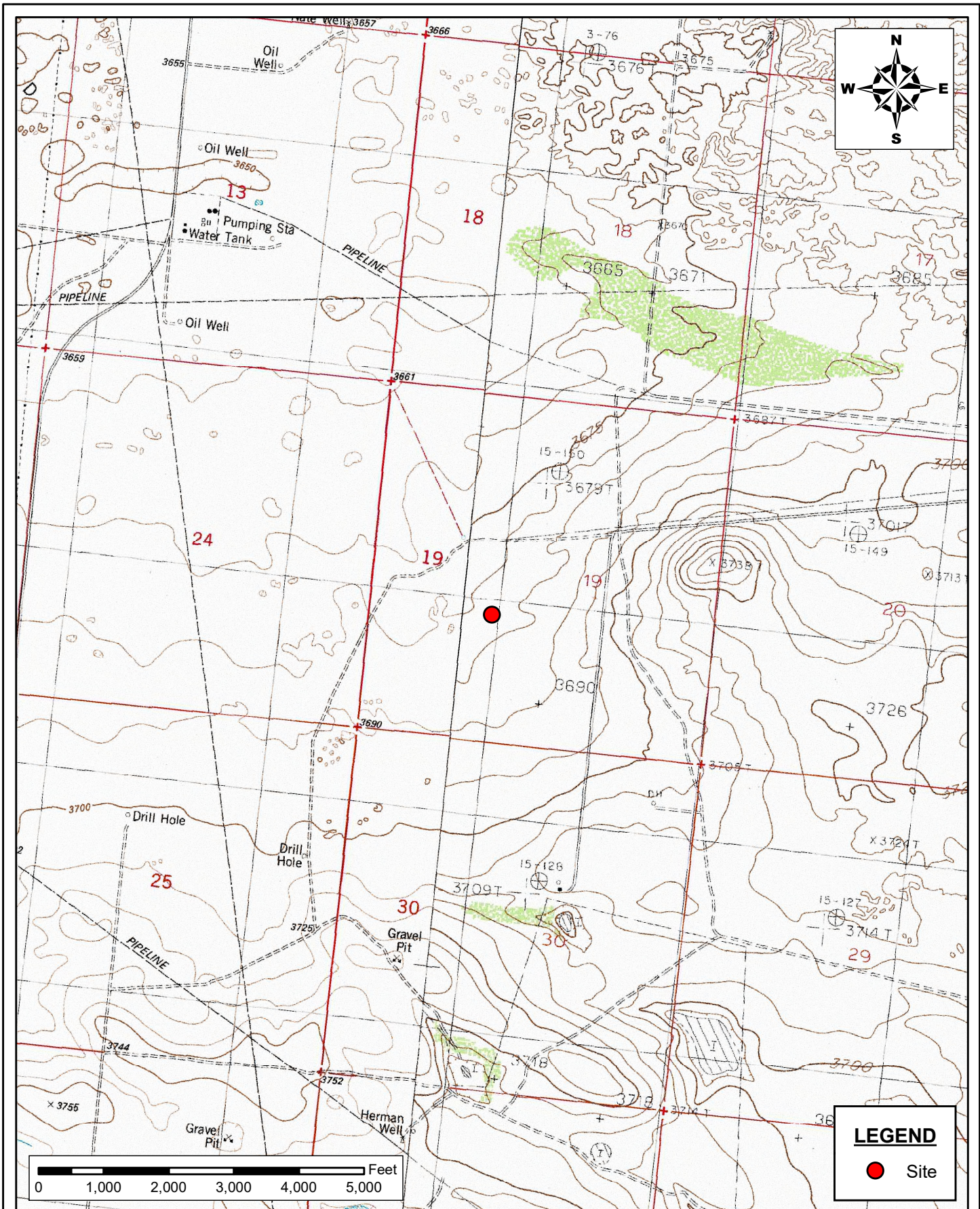
Figure 1. Site Location Map

Figure 2. Area Map

Figure 3. Release Area Map



Document Path: P:\2020 PROJECT\ICAZAIRSC\203344 - Igloo 19 CTB\7 - Figures\Geodatabase\203344\_CAZA\_FIG 2\_AMap\_08272020.mxd



**AREA MAP**  
**CLOSURE REQUEST REPORT**  
 CAZA OPERATING, LLC  
 IGLOO 19 CENTRAL TANK BATTERY RELEASE  
 LEA COUNTY, NEW MEXICO

SCALE: AS SHOWN    DATE: 08/27/2020    PROJECT #: 203344

**New Tech Global Environmental, LLC**  
 911 Regional Park Drive  
 Houston, Texas 77060  
 T - 281.872.9300  
 F - 281.872.4521  
 Web: www.ntglobal.com



**NOTES:**

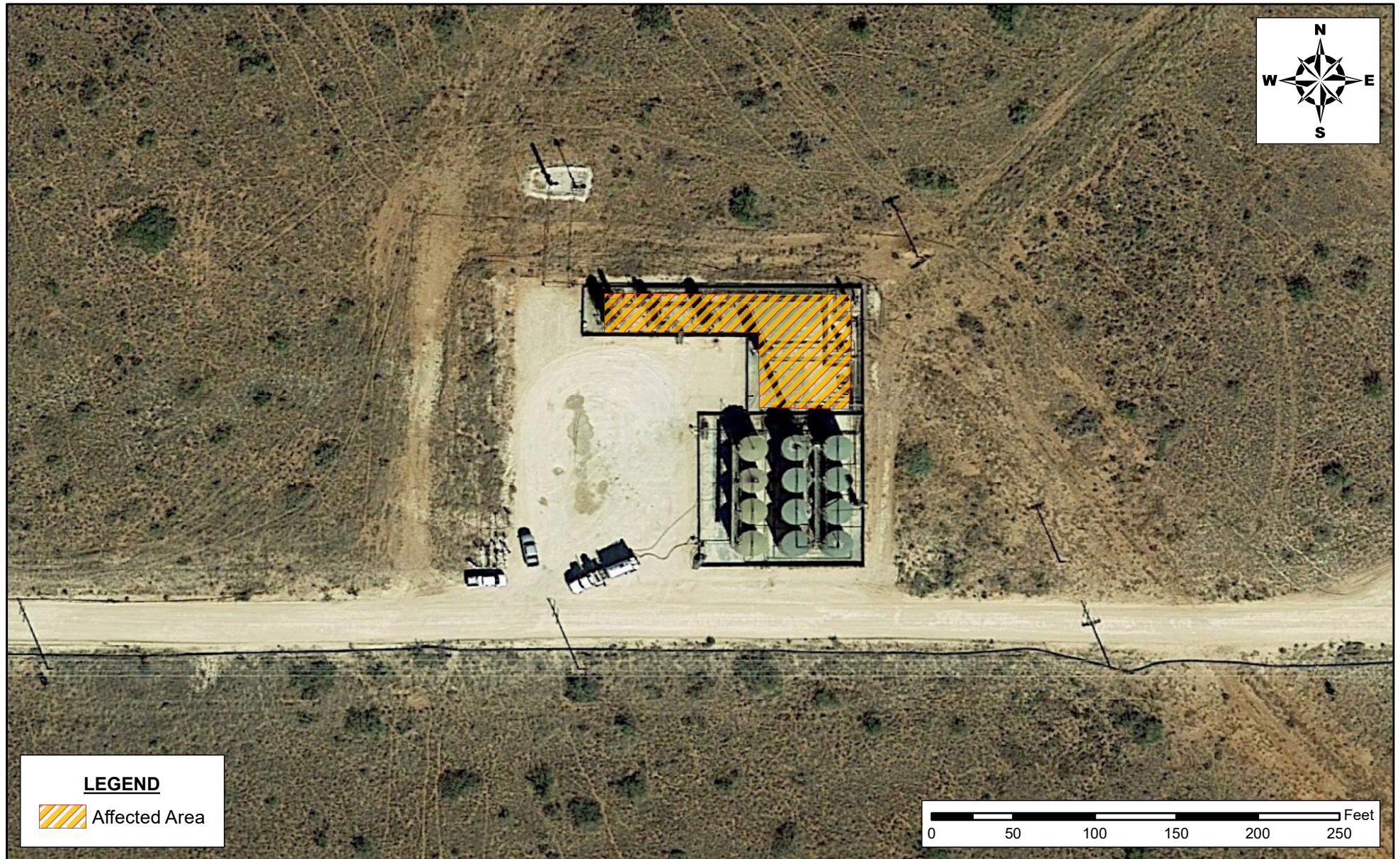
1. Base Image: USDA, NRCS-NCGC 2002
2. Map Projection: NAD 1983

DRAWING NUMBER:

**FIGURE 2**

SHEET NUMBER:

**1 of 1**



**RELEASE AREA MAP  
CLOSURE REQUEST REPORT**  
CAZA OPERATING, LLC  
IGLOO 19 CENTRAL TANK BATTERY RELEASE  
LEA COUNTY, NEW MEXICO

SCALE: AS SHOWN

DATE: 08/27/2020

PROJECT #: 203344

**New Tech Global Environmental, LLC**  
911 Regional Park Drive  
Houston, Texas 77060  
T - 281.872.9300  
F - 281.872.4521  
Web: www.ntglobal.com

**NOTES:**

1. Base Image: ESRI Maps and Data 2017  
(DigitalGlobe 2016 0.5m Digital Orthophoto)
2. Map Projection: NAD 1983

DRAWING NUMBER:

**FIGURE 3**

SHEET NUMBER:

**1 of 1**

## **APPENDIX A – FORM C-141**

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Form C-141  
Revised August 24, 2018  
Submit to appropriate OCD District office

Incident ID	NRM2025461364
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party Caza Operating, LLC	OGRID 249099
Contact Name Kevin Garrett	Contact Telephone 432-556-8508
Contact email kgarrett@cazapetro.com	Incident # (assigned by OCD)
Contact mailing address 200 N Loraine Suite 1550 Midland Texas 79701	

### Location of Release Source

Latitude 32.556641 Longitude -103.499032  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Igloo 19 State Central Tank Battery	Site Type Tank Battery
Date Release Discovered 08/13/2020	API# (if applicable)

Unit Letter	Section	Township	Range	County
O	19	20S	35E	Lea

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

### Nature and Volume of Release

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

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 10bbls	Volume Recovered (bbls) 10bbls
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

#### Cause of Release

"T" fitting on interconnecting piping failed on the lower side causing a leak of produced water inside of the facility containment.

Was this a major  
release as defined by  
19.15.29.7(A) NMAC?

☐ Yes ☒ No

If YES, for what reason(s) does the responsible party consider this a major release?

If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?

## Initial Response

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

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

If all the actions described above have not been undertaken, explain why:

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

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

Printed Name: Kevin Garrett Title: Production Engineer

Signature: [Signature] Date: 8/28/20

email: kgarrett@cazapetro.com Telephone: 432-556-8508

### OCD Only

Received by: Ramona Marcus Date: 9/10/2020

Incident ID	NRM2025461364
District RP	
Facility ID	
Application ID	

## Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- ☒ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☒ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☐ Laboratory analyses of final sampling (Note: appropriate OCD District office must be notified 2 days prior to final sampling)
- ☒ Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Kevin Garrett

Title: Production Engineer

Signature: [Signature]

Date: 8/24/20

email: kgarrett@casapetro.com

Telephone: 932-556-8508

### OCD Only

Received by: Ramona Marcus

Date: 9/10/2020

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

## **APPENDIX B – PHOTOGRAPHIC LOG**

**PHOTOGRAPHIC LOG****CAZA OPERATING, LLC.****Photograph No. 1**

**Facility:** Igloo 19 CTB

**County:** Lea

**Date:** 08/19/2020

**Photographer:** Ethan Sessums

View of facility signage.

**Photograph No. 2**

**Facility:** Igloo 19 CTB

**County:** Lea

**Date:** 08/19/2020

**Photographer:** Ethan Sessums

**Description:**  
View from inside the containment facing east.

**Photograph No. 3**

**Facility:** Igloo 19 CTB

**County:** Lea

**Date:** 08/19/2020

**Photographer:** Ethan Sessums

**Description:**  
View of outer containment area facing east.



**PHOTOGRAPHIC LOG****CAZA OPERATING, LLC.****Photograph No. 4**

**Facility:** Igloo 19 CTB

**County:** Lea

**Date:** 08/19/2020

**Photographer:** Ethan Sessums

View of inside containment facing south.



Aug 19, 2020 10:27:55 AM  
Unnamed Road  
Hobbs  
Lea County  
New Mexico

**Photograph No. 5**

**Facility:** Igloo 19 CTB

**County:** Lea

**Date:** 08/19/2020

**Photographer:** Ethan Sessums

**Description:**

View of outer and inner containment area facing south.



Aug 19, 2020 10:28:24 AM  
Unnamed Road  
Hobbs  
Lea County  
New Mexico

**Photograph No. 6**

**Facility:** Igloo 19 CTB

**County:** Lea

**Date:** 08/19/2020

**Photographer:** Ethan Sessums

**Description:**

View of outer containment area facing west.



Aug 19, 2020 10:30:22 AM  
Unnamed Road  
Hobbs  
Lea County  
New Mexico

**PHOTOGRAPHIC LOG****CAZA OPERATING, LLC.****Photograph No. 7**

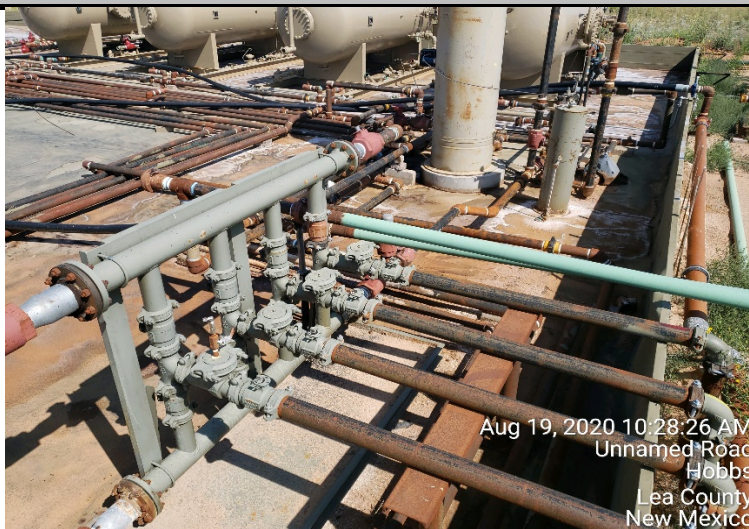
**Facility:** Igloo 19 CTB

**County:** Lea

**Date:** 08/19/2020

**Photographer:** Ethan Sessums

View of inner containment area facing north.



Aug 19, 2020 10:28:26 AM  
Unnamed Road  
Hobbs  
Lea County  
New Mexico

**Photograph No. 8**

**Facility:** Igloo 19 CTB

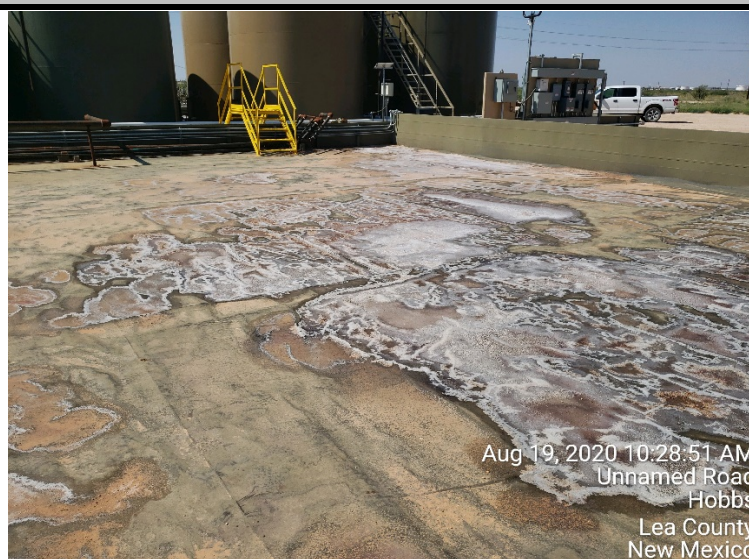
**County:** Lea

**Date:** 08/19/2020

**Photographer:** Ethan Sessums

**Description:**

View of inner containment area facing southwest.



Aug 19, 2020 10:28:51 AM  
Unnamed Road  
Hobbs  
Lea County  
New Mexico

**Photograph No. 9**

**Facility:** Igloo 19 CTB

**County:** Lea

**Date:** 08/19/2020

**Photographer:** Ethan Sessums

**Description:**

View of outer containment area facing northeast.



Aug 19, 2020 10:26:01 AM  
Unnamed Road  
Hobbs  
Lea County  
New Mexico

## PHOTOGRAPHIC LOG

### CAZA OPERATING, LLC.

**Photograph No. 10**

**Facility:** Igloo 19 CTB

**County:** Lea

**Date:** 08/19/2020

**Photographer:** Ethan Sessums

View of inner containment area facing north.

**Photograph No. 11**

**Facility:** Igloo 19 CTB

**County:** Lea

**Date:** 08/19/2020

**Photographer:** Ethan Sessums

**Description:**  
View of outer containment area facing northeast.

**Photograph No. 12**

**Facility:** Igloo 19 CTB

**County:** Lea

**Date:** 08/19/2020

**Photographer:** Ethan Sessums

**Description:**  
View of inner containment area facing south.

