June 11, 2021

NMOCD Environmental Bureau

1220 South St. Francis Drive

Santa Fe, NM 87505

Re: Remediation Plan

BTA Mesa B 8115 JVP Com #002H

Incident ID: nAPP2113973789

To Whom it May Concern

RXSoil, Inc. is pleased to submit the remediation plan for the on-site remediation of impacted soil for the above release.

Sincerely,

Jace Caraway
Chief Operating Officer
RXSoil, Inc.
(940) 210-2051

Zach Robbins
Technical and Engineering Analyst
RXSoil, Inc.
(210) 400-7645

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Figures

Appendix

I. Introduction

On behalf of BTA Oil Producers, LLC, RXSoil, Inc. ("RXSoil") has prepared this work plan that describes remediation of the above-mentioned produced water release.

The release was discovered 5/19/2021 at reported coordinates 32.05100°, -103.60600° (see *Figure 1* for vicinity map). It was reported that 45 barrels of produced water were released, and 33 barrels of produced water were recovered during the initial response.

The C-141 is attached as *Appendix A*.

II. Site Assessment/Characterization

1. **Site Map** – See *Figure 2*
2. **Depth to ground water** – Temporary water wells are scheduled to be drilled in the area in the last week of June, following approval from the Office of the State Engineer. These wells will be drilled to a depth of 105' below ground surface and left open for 48 hours. A report of results will be submitted and used to determine depth to ground water.
3. **Wellhead protection area** – There are no known water sources within a half mile of the release (see *Figure 3*).
4. **Distance to nearest significant watercourse** – The only known significant watercourse within a half mile, per USGS data, is West Dinwiddie Tank, 1,400 feet to the south of the release.
5. **Soil/waste characteristics** – An initial scrape of affected soils was conducted, and impacted material was staged on a polyliner to prevent further spread of contamination. The release remained on the pad. If any off-pad soil is impacted from this release, excavation will ensure the top four feet of soil contains less than 600 mg/kg chlorides, per NMAC 19.15.29.13.D. Sampling will be conducted to confirm horizontal excavation and will consist of sampling sidewalls (composites representing <200 square feet) to verify each wall is below thresholds listed in Table I. Vertical excavation will continue throughout the spill area to clean material per Table I (with bottom samples representing <500 square feet). Excavation will be guided by field data and confirmed via third-party laboratory.

III. Remediation Plan

As stated in **Section II**, delineation will be conducted throughout excavation to thresholds in Table I with samples representing no more than 200 square feet for sidewalls and 500 square feet for bottom samples.

RXSoil's core process of soil remediation will be used to address the contamination. All excavation will be supervised with approval from area utilities owners via NM 811.

RXSoil will construct an above-ground treatment cell on a nearby clearing to avoid tearing up additional vegetation (see *Figure 2* for projected placement). Berms will be constructed around the

perimeter of the cell area. A 20-mil reinforced poly liner will be placed on the surface and up the sides of the berms to contain treatment. A proprietary drainage and collection system will be installed prior to filling the cells. All contaminated soil will be placed in the contained treatment cell for treatment. It is estimated 350 cubic yards will require remediation.

To confirm successful treatment inside the cell, a grid of confirmation samples will be gathered at depth 36”-48” (bottom 12” of 48” depth treatment cell, as previously requested) with one sample representing no more than 100 cubic yards. All cell samples will be field screened and if a sample tests above threshold, treatment will continue in that area until the soil tests clean, per strictest Table I guidelines for impacted soils. Samples will be submitted to a third-party laboratory to be tested for chlorides, TPH, and BTEX using approved NMOCD methods. Treatment will continue until all soil is below strictest Table I thresholds for remediation.

Sidewall and bottom samples will be taken using a stainless-steel hand shovel while treatment cell samples will be taken using a stainless-steel bucket auger. All tools are to be decontaminated before each sample, as specified in *Field Equipment Cleaning and Decontamination* (EPA, 2015). This includes wiping the equipment clean, water-rinsing the equipment, washing the equipment in detergent and water, and rinsing the equipment in water.

Samples will temporarily be transferred to a new plastic bag in the field. Once in a location safer for handling glass, the samples will be transferred to glass jars, supplied by an approved laboratory. The threads on all jars will be wiped clean to allow an air-tight seal. Samples will be transferred on ice to a third-party laboratory to ensure tests are completed within 14 days (as recommended for EPA methods 8021B and 8015M).

Remediation efforts will commence following the approval of this remediation plan and is estimated to take approximately 30 days.

IV. Restoration, Reclamation and Re-Vegetation

Following remediation, RXSoil will return all soils to match previous conditions. RXSoil will submit a closure request pursuant to NMAC 19.15.29.12.

Figure 1 - Vicinity Map

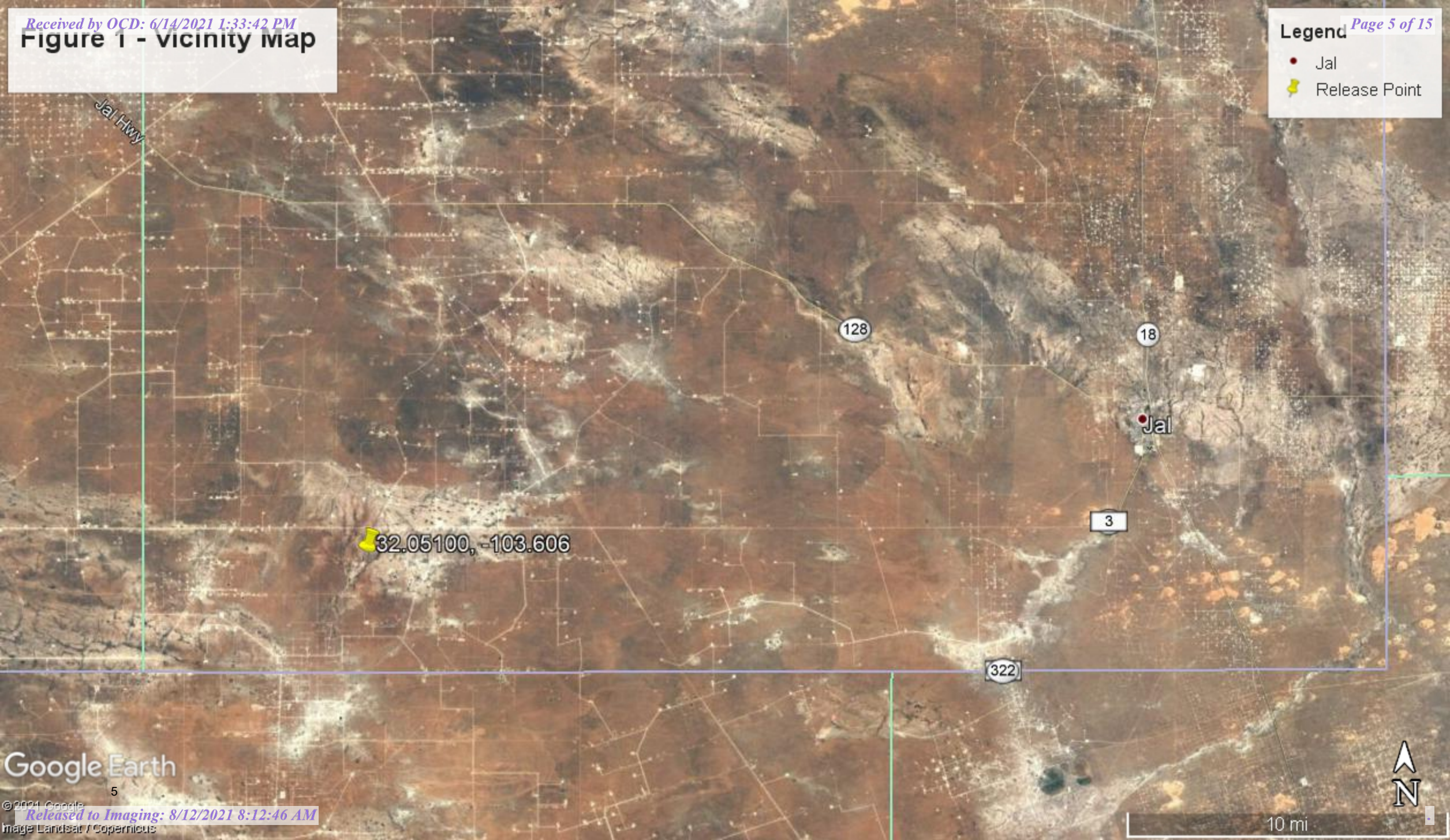

Figure 2 - Site Map

Cell Placement on north edge of map
Spill outline on south side of map

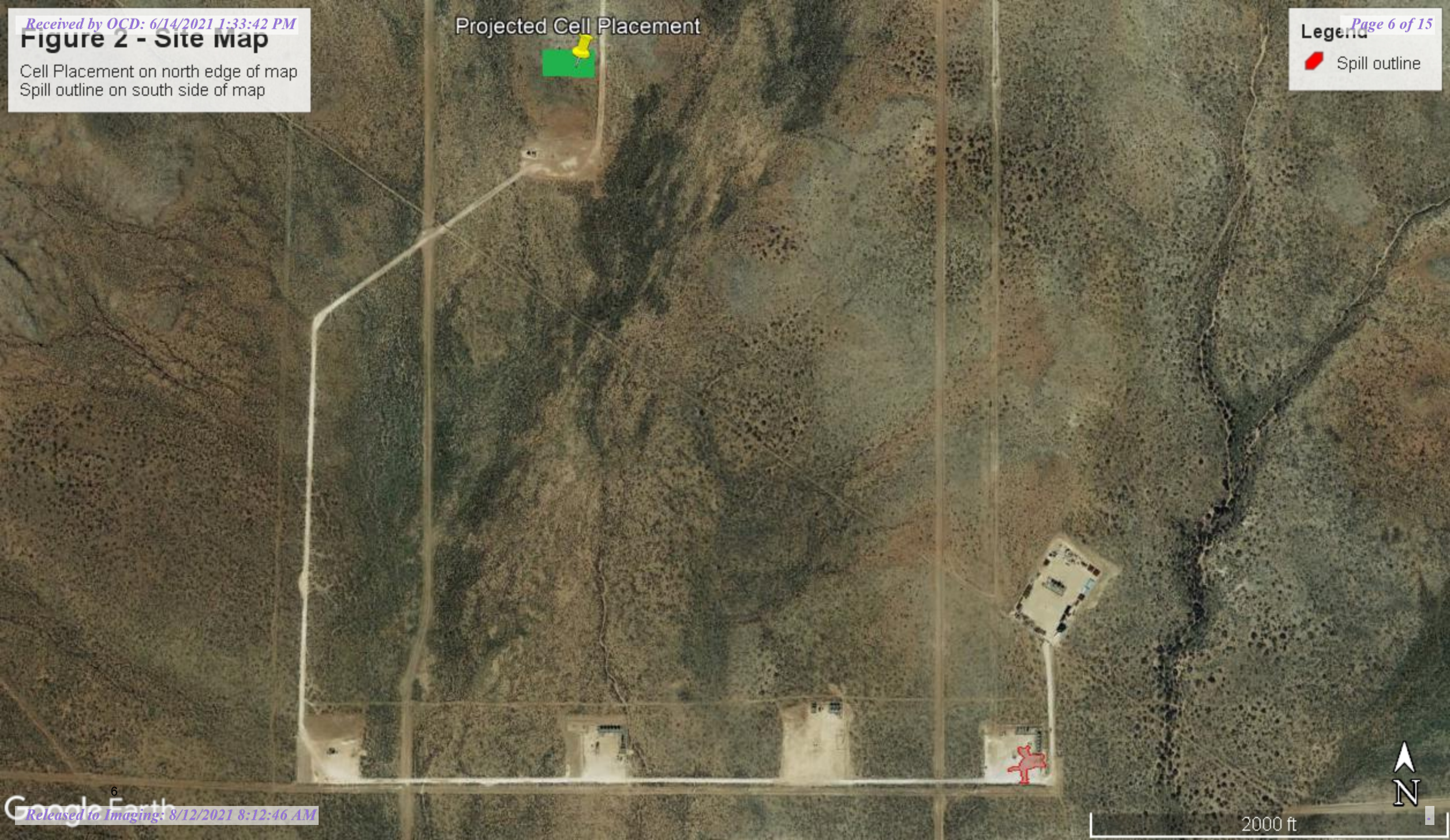

Figure 3 - Hydrology Map

6/10/2021, 7:17:02 PM

Override 1

OCD District Offices

1:18,056

0 0.17 0.35 0.7 mi

0 0.3 0.6 1.2 km

Bureau of Land Management, Texas Parks & Wildlife, Esri, HERE, Garmin, INCREMENT P, USGS, METI/NASA, EPA, USDA, OCD

New Mexico Oil Conservation Division

NM OCD Oil and Gas Map. http://nm-emnrd.maps.arcgis.com/apps/webappviewer/index.html?id=4d017f2306164de29fd2fb9f8f35ca75: New Mexico Oil Conservation Division

APPENDIX A

C-141

Incident ID	nAPP2113973789
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

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

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

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

- ☒ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☐ Field data
- ☐ Data table of soil contaminant concentration data
- ☐ Depth to water determination
- ☒ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☒ Photographs including date and GIS information
- ☒ Topographic/Aerial maps
- ☐ Laboratory data including chain of custody

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

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State of New Mexico
Oil Conservation Division

Incident ID	nAPP2113973789
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I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: Bob Hall Title: Environmental Mgr.

Signature: BHall Date: 6/14/2021

email: bhall@btaoil.com Telephone: (432) 682-3753

OCD Only

Received by: Date:

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State of New Mexico
Oil Conservation Division

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Remediation Plan

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

- ☒ Detailed description of proposed remediation technique
- ☒ Scaled sitemap with GPS coordinates showing delineation points
- ☒ Estimated volume of material to be remediated
- ☒ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☒ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

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

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

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

Printed Name: Bob Hall Title: Environmental Mgr.

Signature: Bob Hall Date: 6/14/2021

email: bhall@btaoil.com Telephone: (432) 682-3753

OCD Only

Received by: Chad Hensley Date: 08/12/2021

☐ Approved ☒ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: Chad Hensley Date: 08/12/2021

APPENDIX B

SITE PHOTOGRAPHS

END OF REPORT

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

CONDITIONS

Action 31856

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 31856
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
chensley	RXSoil may test treatment inside the cell in any manner they choose. However, prior to backfill, cells we will be sampled no greater than 200 sq/ft and samples will be submitted to a third-party laboratory to be tested for chlorides, TPH, and BTEX using approved NMOCD methods.	8/12/2021