11451 Katy Freeway, Suite 400 Houston, Texas 77079 United States www.ghd.com



Our ref: 12571917-NWOCD-1

January 28, 2022

New Mexico Oil Conservation Division District 1 1625 N. French Drive Hobbs, New Mexico 88240

Site Characterization Work Plan
Saunders Salt Water Disposal #002 Release Site
Sabinal Energy Operating LLC
Incident ID: nSAP0230839785, nSAP0230537114, nSAP0232539443, nSAP0335031519, nSAP0335640026
N 03 15S 33E, Lea County, New Mexico

To Whom It May Concern:

1. Introduction

GHD Services Inc. (GHD), on behalf of Sabinal Energy Operating LLC (Sabinal), submits this Site Characterization Work Plan (Work Plan) to the New Mexico Oil Conservation Division (NMOCD) District 1 Office. This Work Plan proposes site characterization activities associated with Incident ID: nSAP0230839785, nSAP0230537114, nSAP0232539443, nSAP0335031519, nSAP0335640026 at the Saunders Salt Water #002 release site (Site). According to publicly available information via the New Mexico Oil Conservation Division's (NMOCD) website, there are (5) historical releases that were identified during operations by Energen Resources Corporation. Although they were identified by Energen Resources Corporation, no record of site characterization or remediation were able to be identified. Sabinal acquired the assets in 2019 and has prepared this workplan to characterize potential impacts associated with these historical releases.

The Site is located in the Unit Letter N Section 3 of Township 15 South and Range 33 East in Lea County, New Mexico. The GPS coordinates for the Site are 33.0407677 N latitude and -103.6044464 W longitude.

2. Background Information

The release falls under the jurisdiction of the NMOCD District 1 Office in Artesia, New Mexico. The table below summarizes incidents: nSAP0230839785, nSAP0230537114, nSAP0232539443, nSAP0335031519, nSAP0335640026.

Incident ID #	Date Of Occurrence	Material Released	Amount Released (bbl)	Amount Recovered (bbl)	Incident Details
nSAP0230839785	9/18/2002	Produced Water	1235	1210	Electrician Working on PMP After Repairs Made Did Not Turn SWD PMP Back on Causing Storage Tanks To Fill And Overflow. Trks Called to Pick-Up Free Liquid and Return To Storage Tnks. Re-Start SWD PMP. Spill In Firewall Area.
nSAP0230537114	10/25/2002	Produced Water	80	123	Flowline Clamp Failed Due to External Corrosion From A Buried SWD Transfer Line On The Saunders Lease. Shut Down PMP And Began Picking Up Liquid Enamanting from Flowline. Line Was Repaired and Put Back in Service. All Free Liquid Including Some Rainwater Was Removed from Area.
nSAP0232539443	11/11/2002	Produced Water	50	70	Clamp used to repair previous spill failed. Area affected was in low spot, line was shut in and free liquids in area were removed.
nSAP0335031519	1/27/2003	Produced Water	112	110	Packing Gland on PMP Failed. Area Inside the Secondary Containment of The Battery.
nSAP0335640026	1/27/2003	Produced Water	110	112	Packing Gland Failed. Area Inside Secondary Containment of The Battery Is Where Produced Water Collected

Based upon the incident details and dates, incidents nSAP0335031519 and nSAP0335640026 appear to be the same release. A C-141, Release Notification, was identified for incidents nSAP0335031519 and nSAP0335640026 is provided in Attachment 1. A C-141 Release Notification was prepared for nSAP0230839785 and is provided in Attachment 2, a C-141 Release Notification was prepared for nSAP0230537114 and is provided in Attachment 3, and a C-141 Release Notification was prepared for nSAP0232539443 and is provided in Attachment 4.

3. Groundwater and Site Characterization

GHD characterized the Site according to Table 1, Closure Criteria for Soil Impacted by a Release, from New Mexico Administrative Code (NMAC) Title 19, Chapter 15, Part 29, Section 12 (NMAC 19.15.29.12).

According to the Site characterization evaluation and 19.15.29.12.C(4)(a)(i), the Site is located within an area of low karst potential. No groundwater data could be located within one-half mile of the Site. No receptors (water wells, playas, wetlands, waterways, lakebeds or ordinance boundaries) were located within each specific boundaries or distance from the Site. The Site characterization documentation (Karst Potential, Federal Emergency Management Agency [FEMA], Points of Diversion and Wetlands maps) are provided in Attachment D. The data used to acquire this information is listed below:

- Points of Diversion (and depth to groundwater) https://gis.ose.state.nm.us/gisapps/ose_pod_locations/;
- Significant Watercourse https://ngmdb.usgs.gov/topoview/viewer/#4/40.01/-100.06;
- Wetlands https://www.fws.gov/wetlands/data/mapper.html; and
- FEMA Flood Map https://msc.fema.gov/portal/home.

No groundwater data could be located within ½ mile from the Site; therefore, the most stringent Closure Criteria (depth to water ≤ 50 feet) will be utilized to evaluate soil analytical data. The soil and closure criteria are listed below:

General Site Characterization and Groundwater:

Site Characterization		Average Groundwater Depth (ft.)	
	No Receptors Found	Unknown Within A Half Mile	

Closure Criteria for Soils Impacted by a Release (NMAC 19.15.29.12)

Constituent	Limits	
Chloride	600 mg/kg	
TPH (GRO+DRO+MRO)	100 mg/kg	
TPH (GRO+DRO)	Not Applicable	
Benzene	10 mg/kg	
BTEX	50 mg/kg	

Following receipt of soil analytical results, the installation of a temporary groundwater monitoring well may be considered to determine if less stringent Closure Criteria (depth to water 51 feet - 100 feet or >100 feet) are suitable for use at this Site. If installed, the groundwater determination soil boring would be drilled to 105 feet below ground surface (bgs) and will be left open for 72 hours to determine the presence or absence of groundwater by utilization of a water level meter. If groundwater is detected at fifty-one (51) feet or greater the closure criteria for this site will change accordingly with NMAC 19.15.29.12 Table 1.

4. Proposed Work Plan

Three borings are proposed to assess historical releases associated with incidents nSAP0230839785, nSAP0230537114, nSAP0232539443, nSAP0335031519, and nSAP0335640026. Refer to Figure 2 for proposed boring locations. Borings will be advanced via hand auger to 4 ft bgs, if refusal is not met. Two soil samples will be collected per boring - one from approximately 1 ft bgs and one from the bottom of the boring. All soil samples will be analyzed for BTEX by Environmental Protection Agency (EPA) Method 8021B, TPH by Method 8015B Modified, and chloride by EPA Method 300.

Field work will be conducted within 15 days following Work Plan approval. Once analytical results are obtained from the laboratory, the results will be evaluated and submitted in a Site Characterization Report, along with recommendations for further actions (if needed), to the NMOCD within 30 days following receipt of the data.

If you have any questions or comments concerning this Site Characterization Work Plan, please do not hesitate to contact me.

Regards

Valerie Phipps

Veg pl.

Senior Project Manager

+1 832 380-7665

Valerie.Phipps@GHD.com

Phillip Čole

Environmental Scientist

+1 409 548-3479

Phillip.Cole@GHD.com

VP/kdn/1

Encl. Figure 1 - Site Location Map

Figure 2 - Proposed Boring Location Map

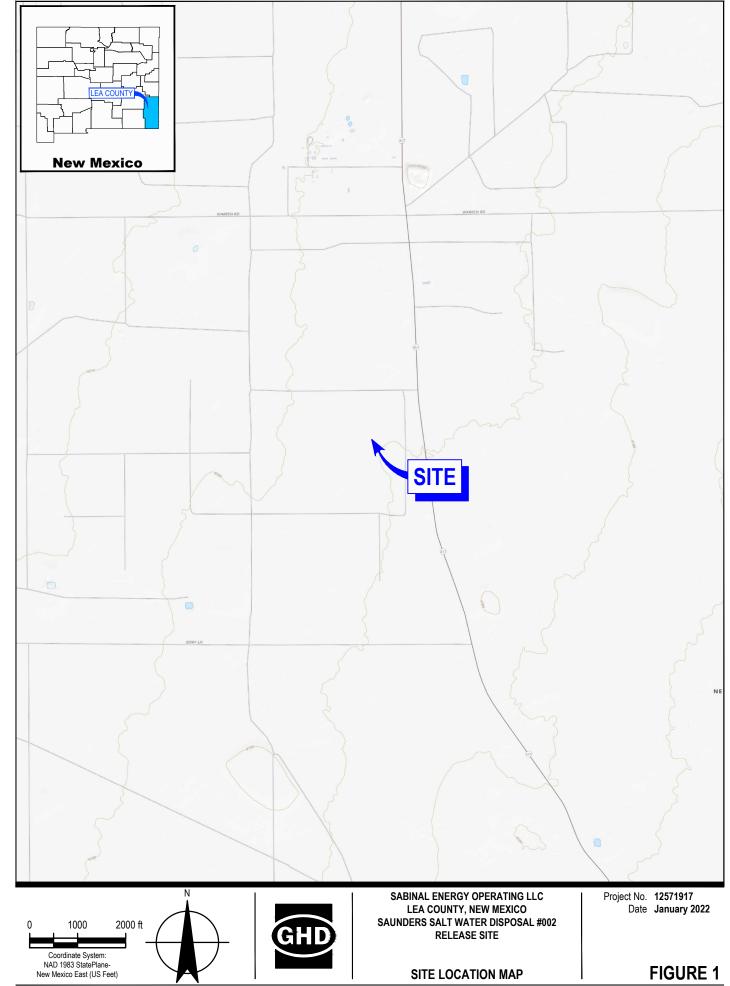
Attachment 1 - C-141 (nSAP0335031519 and nSAP0335640026)

Attachment 2 - C-141 nSAP0230839785 Attachment 3 - C-141 nSAP0230537114 Attachment 4 - C-141 nSAP0232539443

Attachment 5 - Site Characterization Documentation

Copy to: Kyle Sanders, Sabinal Energy Operating LLC

Ari Biernoff, New Mexico State Land Office





80 ft Coordinate System: NAD 1983 StatePlane-New Mexico East (US Feet)



LEA COUNTY, NEW MEXICO SAUNDERS SALT WATER DISPOSAL #002 RELEASE SITE

Date January 2022

PROPOSED BORING LOCATION MAP

FIGURE 2

Attachment 1

C 141 (nSAP0335031519 and nSAP0335640026)

Received by OCD: 2/1/2022 2:50:06 PM

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, 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

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

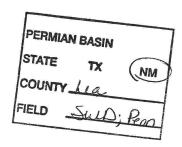
Form C-141 Revised March 17, 1999

Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

	Compatient Action			
Release Notification	and Corrective Action			
	OPERATOR	Initial Report Final Report		
Name of Company: Energen Resources Corp.	Contact: Andy Cobb			
Address: 3300 N. "A" St. Bldg. 4 Ste. 100 Midland, Tx. 79705	Telephone No. (915) 687-1155			
Facility Name: Saunders #2-N SWD	Facility Type: SWD permit # H-21	1396		
n	N			
Surface Owner: State of New Mexico Mineral Owner:	State of New Mexico	Lease No. SWD-14		
LOCATIO	N OF RELEASE			
Unit Letter Section: Township: Range 3 15-S 33-E 810° FSL	/South Line Feet from the 1980' East/West Line County: LEA FWL			
	OF RELEASE			
Type of Release: Produced Water	Volume of Release: 110 barrels	Volume Recovered: 112 barrels		
A 702	Date and Hour of Occurrence:	Date and Hour of Discovery:		
Source of Release: Lost packing gland on SWD pump	01/27/03 @ 6:00 AM	1/27/03 @ 10:30 AM		
Was Immediate Notice Given? ☐ Yes ☐ No ☐ Not Required	If YES, To Whom? Hobbs OCD office voice mail	If YES, To Whom? Hobbs OCD office voice mail		
By Whom?	Date and Hour 1/27/03 @ 4:10 PM			
Andy Cobb; Energen Resources Was a Watercourse Reached?	If YES, Volume Impacting the Watercourse.			
☐ Yes No				
If a Watercourse was Impacted, Describe Fully.* Describe Cause of Problem and Remedial Action Taken.* A packing gland on the Salt-water disposal pump failed causing water to be released from the pump rather than into the disposal well. A vacuum truck was dispatched to pick-up the spilled liquids.				
Describe Area Affected and Cleanup Action Taken.* An area inside the secondary containment of the battery approx. 30° x 30° is where the produced water collected. All free liquid was removed by vacuum truck.				
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other				
federal, state, or local laws and/or regulations.	OIL CONSERV	VATION DIVISION		
Signature: Oldrew Cold				
Printed Name: And rew Colob Title: HSE Coordinator	Approved by District Supervisor:			
145 Condinistor	Approval Date:	Expiration Date:		
Title: HSt Coordinator		Attached		

Conditions of Approval:

Date: 1-27-03 * Attach Additional Sheets If Necessary



Attachment 2

C 141 nSAP0230839785

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

State of New Mexico Energy Minerals and Natural Resources Department

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Form C-141 Revised August 24, 2018 Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party: Energen Resources Group			OGRID: 1	162928		
Contact Name:			Contact Telephone:			
Contact email:			Incident #	nSAP0230839785		
Contact mail	ing address:				I	
			Location	of R	delease S	ource
Latitude 33.0)407677				Longitude -	-103.6044464
			(NAD 83 in de	ecimal de	grees to 5 decin	mal places)
Site Name: S.	AUNDERS	SALT WATER D	DISPOSAL #002		Site Type:	Produced Water Release
Date Release	Discovered	: 9/18/2002			API# 30-0	25-01218
Unit Letter	Section	Township	Range		Cour	nty
N	03	15S	33E	Lea		
Crude Oil	Materia	Federal To	Nature and that apply and attack	d Vo	lume of 1	
Produced	Water	Volume Release	ed (bbls) 1235			Volume Recovered (bbls) 1210
Is the concentration of dissolved chloride produced water >10,000 mg/l?			chloride	e in the	☐ Yes ☐ No	
Condensa	ate	Volume Release				Volume Recovered (bbls)
Natural G	Gas	Volume Release	ed (Mcf)			Volume Recovered (Mcf)
Other (describe) Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)		
CAUSING S	TORAGE T		AND OVERFLO	W. TRI	KS CALLED	IADE DID NOT TURN SWD PMP BACK ON D TO PICK-UP FREE LIQUID AND RETURN TO

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ruge	110	F 50

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Was this a major	If YES, for what reason(s) does the responsib	ple party consider this a major release?	
release as defined by 19.15.29.7(A) NMAC?	It is considered a major release because of the	e 1235 (bbls) released of produced water.	
⊠ Yes □ No	, and the second		
If YES, was immediate no	otice given to the OCD? By whom? To whom	n? When and by what means (phone, email, etc)?	
Yes, by Industry Rep, wh	en and means unknown.		
	Initial Resp	ponse	
The responsible p	party must undertake the following actions immediately un	aless they could create a safety hazard that would result in injury	
The source of the rele	ease has been stopped.		
	as been secured to protect human health and the	environment.	
Released materials ha	ave been contained via the use of berms or dike	es, absorbent pads, or other containment devices.	
All free liquids and re	ecoverable materials have been removed and m	nanaged appropriately.	
If all the actions described	d above have <u>not</u> been undertaken, explain why	y:	
The initial response was completed by Energen Resources Group, who was the operator at the time of the release. Sabinal Energy Operating LLC acquired the asset in July 2019.			
Par 10 15 20 8 R (4) NM	(AC the responsible party may commence rem	adjution immediately after discovery of a release. If remediation	
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.			
regulations all operators are public health or the environr failed to adequately investig	required to report and/or file certain release notifica ment. The acceptance of a C-141 report by the OCD rate and remediate contamination that pose a threat to	t of my knowledge and understand that pursuant to OCD rules and tions and perform corrective actions for releases which may endanger do does not relieve the operator of liability should their operations have o groundwater, surface water, human health or the environment. In ponsibility for compliance with any other federal, state, or local laws	
Printed Name: _Kyle San	ders	Title: _Manager – Environmental, Health, and Safety	
Signature: <u>Kyle Sar</u>	nders	Date: 02/01/2022	
_		Telephone: 346-224-9343	
OCD Only			
Received by:	D	Oate:	

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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?	<u>Unknown</u> (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 well 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	ls.			

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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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:	Title:		
Signature:	Date:		
email:	Telephone:		
OCD Only			
Received by:	Date:		

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Remediation Plan

Remediation Plan Checklist: Each of the following items must b	a included in the plan
Detailed description of proposed remediation technique	e included in the plan.
Scaled sitemap with GPS coordinates showing delineation poin	ts
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 tin	
	11 1 /
<u>Deferral Requests Only</u> : Each of the following items must be con	nfirmed as part of any request for deferral of remediation.
Contamination must be in areas immediately under or around p deconstruction.	roduction equipment where remediation could cause a major facility
Extents of contamination must be fully delineated.	
Contamination does not cause an imminent risk to human healt	h, the environment, or groundwater.
	e and remediate contamination that pose a threat to groundwater, acceptance of a C-141 report does not relieve the operator of
Printed Name:	Title:
Signature:	Date:
email:	Telephone:
OCD Only	
Received by:	Date:
☐ Approved ☐ Approved with Attached Conditions of	Approval
Signature:	<u>Date:</u>

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Closure

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

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

☐ A scaled site and sampling diagram as described in 19.15.29.11 NMAC			
Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)			
☐ Laboratory analyses of final sampling (Note: appropriate ODC	C District office must be notified 2 days prior to final sampling)		
☐ Description of remediation activities			
and regulations all operators are required to report and/or file certain may endanger public health or the environment. The acceptance of	ntions. The responsible party acknowledges they must substantially nditions that existed prior to the release or their final land use in		
Printed Name:	_ Title:		
Signature:	Date:		
email:	Telephone:		
OCD Only			
Received by:	Date:		
	of liability should their operations have failed to adequately investigate and water, human health, or the environment nor does not relieve the responsible for regulations.		
Closure Approved by:	Date:		
Printed Name:	Title:		

Attachment 3

C 141 nSAP0230537114

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	NSAP0230537114
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Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party: Energen Resources Group OGRID: 1		62928					
Contact Name: Contact		Contact Te	elephone:				
Contact emai	il:				Incident #	nSAP0230537114	
Contact mail	ing address				I		
			Location	of R			
Latitude: 33.0	407677		(NAD 83 in de	ecimal de	Longitude: <u>-</u> grees to 5 decin	103.6044464 nal places)	
Site Name: Sa	AUNDERS	SALT WATER I	DISPOSAL #002		Site Type:	Salt Water Disposal	
Date Release	Discovered:	: 10/25/2002			API# 30-02	25-01218	
Unit Letter	Section 03	Township	Range	T	Coun	ty	
N	03	15S	33E	Lea			
	Materia	ıl(s) Released (Select a		d Vo	lume of I	Release justification for the volumes provided below)	
Crude Oil		Volume Release				Volume Recovered (bbls)	
Produced	Water	Volume Release	· · ·			Volume Recovered (bbls) 123	
Is the concentration of dissolved chloride in produced water >10,000 mg/l?		e in the	Yes No				
☐ Condensa	ite	Volume Release	ed (bbls)			Volume Recovered (bbls)	
Natural Gas Volume Released (Mcf)			Volume Recovered (Mcf)				
Other (describe) Volume/Weight Released (provide units))	Volume/Weight Recovered (provide units)				
SAUNDERS	CLAMP FA	HUT DOWN PMI	AND BEGAN P	ICKIN	G UP LIQUI	BURIED SWD TRANSFER LINE ON THE ID ENAMANTING FROM FLOWLINE. LINE WAS G SOME RAINWATER WAS REMOVED FROM	

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Incident ID	NSAP0230537114
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W/	ICVES C. 1.4			
Was this a major				
release as defined by 19.15.29.7(A) NMAC?	Equipment Failure from the fuel line injection			
19.13.29.7(A) WIAC:	Equipment randre from the ruer line injec	.1011		
⊠ Yes □ No				
If YES, was immediate no	otice given to the OCD? By whom? To wh	om? When and by what means (phone, email, etc)?		
W 1 I. I D 1.				
res, by industry kep, wn	en and by what means is not known.			
	Initial Re	esponse		
The responsible	narty must undertake the following actions immediately	vunless they could create a safety hazard that would result in injury		
The responsible j	party must undertake the following actions immediately	untess they could create a safety hazara that would result in injury		
The source of the rele	ease has been stopped.			
∑ The impacted area ha	s been secured to protect human health and	the environment.		
Released materials ha	ave been contained via the use of berms or d	ikes, absorbent pads, or other containment devices.		
<u> </u>		•		
<u> </u>	ecoverable materials have been removed and			
If all the actions described	d above have <u>not</u> been undertaken, explain v	vhy:		
The initial response was	nompleted by Engran Passuraes Group, wh	a was the aparator at the time of the release. Schinel Energy		
	The initial response was completed by Energen Resources Group, who was the operator at the time of the release. Sabinal Energy Operating LLC acquired the asset in July 2019.			
operating EEC acquired	the asset in vary 2017.			
Per 19.15.29.8 B. (4) NM	AC the responsible party may commence re	emediation immediately after discovery of a release. If remediation		
		efforts have been successfully completed or if the release occurred		
within a lined containmer	nt area (see 19.15.29.11(A)(5)(a) NMAC), p	lease attach all information needed for closure evaluation.		
I hereby certify that the info	rmation given above is true and complete to the b	pest of my knowledge and understand that pursuant to OCD rules and		
		ications and perform corrective actions for releases which may endanger		
		CD does not relieve the operator of liability should their operations have		
		at to groundwater, surface water, human health or the environment. In responsibility for compliance with any other federal, state, or local laws		
and/or regulations.	1 a C-141 report does not reneve the operator of h	esponsibility for compliance with any other federal, state, or local laws		
Printed Name: _Kyle San	<u>ders</u>	Title: _Manager - Environmental, Health, and Safety		
~.	/	- 02/04/2022		
Signature: <u>Ayla Jan</u>	ders	Date: 02/01/2022		
•	ergy.com	Telephone: 346-224-9343		
eman. <u>-kyros e saomaron</u>	<u></u>	1010phone. <u>-510 221 7515</u>		
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OCD Only				
Received by: Ramona I	Marcus	Date: 02012022		
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Site Assessment/Characterization

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

	<u>Unknown</u> (ft bgs)		
What is the shallowest depth to groundwater beneath the area affected by the release?	☐ Yes ⊠ No		
Did this release impact groundwater or surface water?			
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 ☐ Yes ☒ No		
Are the lateral extents of the release overlying a subsurface mine?			
Are the lateral extents of the release overlying an unstable area such as karst geology?			
Are the lateral extents of the release within a 100-year floodplain?			
Did the release impact areas not on an exploration, development, production, or storage site?			
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 well 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	ls.		

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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Incident ID	
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Facility ID	
Application ID	

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:	_ Title:	
Signature:	Date:	
email:	Telephone:	
OCD Only		
Received by:	Date:	

Received by OCD: 2/1/2022 2:50:06 PM Form C-141 State of New Mexico Page 5 Oil Conservation Division

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Facility ID	
Application ID	

Remediation Plan

Domodiation Plan Charlist: Each of the following items must be	a included in the 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 times)	neline is more than 90 days OCD approval is required)			
<u>Deferral Requests Only</u> : Each of the following items must be con	nfirmed as part of any request for deferral of remediation.			
Contamination must be in areas immediately under or around predeconstruction.	roduction equipment where remediation could cause a major facility			
Extents of contamination must be fully delineated.				
Contamination does not cause an imminent risk to human health	n, the environment, or groundwater.			
	te to the best of my knowledge and understand that pursuant to OCD			
	certain release notifications and perform corrective actions for releases			
which may endanger public health or the environment. The accepta liability should their operations have failed to adequately investigate				
surface water, human health or the environment. In addition, OCD				
responsibility for compliance with any other federal, state, or local l				
responsionity for compitance with any other redetal, state, or rocal r	uns and of fogulations.			
Printed Name:	Title:			
Signature:	Date:			
Signature.	Date.			
email:	Telephone:			
OCD Only				
Received by:	Date:			
Approved Approved with Attached Conditions of	Approval			
Signature:	Date:			

Received by OCD: 2/1/2022 2:50:06 PM Form C-141 State of New Mexico Page 6 Oil Conservation Division

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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 19.15.29.1	1 NWAC	
☐ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)		
☐ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)		
Description of remediation activities		
and regulations all operators are required to report and/or file certain may endanger public health or the environment. The acceptance of	ntions. The responsible party acknowledges they must substantially nditions that existed prior to the release or their final land use in OCD when reclamation and re-vegetation are complete.	
Signature:	Date:	
email:	Telephone:	
OCD Only		
OCD Only Received by:	Date:	
Received by:	of liability should their operations have failed to adequately investigate and water, human health, or the environment nor does not relieve the responsible	
Received by:	of liability should their operations have failed to adequately investigate and water, human health, or the environment nor does not relieve the responsible or regulations.	
Received by:	of liability should their operations have failed to adequately investigate and water, human health, or the environment nor does not relieve the responsible or regulations. Date:	

Attachment 4

C 141 nSAP0232539443

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

State of New Mexico Energy Minerals and Natural Resources Department

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Form C-141 Revised August 24, 2018 Submit to appropriate OCD District office

Incident ID	
District RP	
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Application ID	

Release Notification

Responsible Party

Responsible Party: Energen Resource Group		OGRID: 162928					
Contact Name:			Contact Telephone:				
Contact email:		Incident #	nSAP0232539	0443			
Contact mai	Contact mailing address						
			Location	n of R	elease S	ource	
Latitude: 33.0)407677				Longitude:	-103.6044464	
			(NAD 83 in a	decimal de	grees to 5 decii	mal places)	
Site Name: S	aunders Salt	Water Disposal #	\$ 002		Site Type:	Salt Water Dis	sposal
Date Release	Discovered	: 11/11/2002			API# 30-0	25-01218	
Unit Letter	Section	Township	Range		Cour	nty	
N	03	15S	33E	Lea			
Surface Owner: State Federal Tribal Private (Name: State of New Mexico Nature and Volume of Release Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)							
Crude Oi		Volume Releas					overed (bbls)
Non-	Water	Volume Releas	ed (bbls) 50			Volume Rec	overed (bbls) 70
	Is the concentration of dissolved chloride produced water >10,000 mg/l?		e in the	Yes 1	No		
Condensa	Condensate Volume Released (bbls)			Volume Recovered (bbls)			
Natural C	Natural Gas Volume Released (Mcf)			Volume Recovered (Mcf)			
Other (de	Other (describe) Volume/Weight Released (provide units))	Volume/Weight Recovered (provide units)			
Cause of Rel	ease:						
clamp used t	o repair prev	vious spill failed.	Area affected was	s in low	spot, line wa	as shut in and fi	ree liquids in area were removed.

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Was this a major	If YES, for what reason(s) does the responsible party consider this a major release?	
release as defined by 19.15.29.7(A) NMAC?	Yes 50 (bbl) of salt water released	
19.13.29.7(A) WIAC:	1 cs 50 (bbl) of sait water released	
⊠ Yes □ No		
	otice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	
Yes, by industry Rep, wn	en and by what means is not known.	
	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 rele	ease has been stopped.	
The impacted area ha	as been secured to protect human health and the environment.	
_ •	ave been contained via the use of berms or dikes, absorbent pads, or other containment devices.	
	ecoverable materials have been removed and managed appropriately.	
<u> </u>	<u> </u>	
if all the actions described	d above have <u>not</u> been undertaken, explain why:	
The initial response was o	completed by Energen Resources Group, who was the operator at the time of the release. Sabinal Energy	
Operating LLC acquired the asset in July 2019.		
	AC the responsible party may commence remediation immediately after discovery of a release. If remediation	
	a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred	
	nt area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
	rmation given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and required to report and/or file certain release notifications and perform corrective actions for releases which may endanger	
	nent. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have	
	ate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In	
addition, OCD acceptance o and/or regulations.	f a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws	
_		
	ders Title: Manager – Environmental, Health, and Safety	
Signature: Kyle San	Date:02/01/2022_	
_	ergy.com Telephone: <u>346-224-9343</u>	
eman. <u>kyles@saomalem</u>	<u>argy.com</u> <u>relephone340-224-9343</u>	
OCD Only		
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keceived by:	Date:	

Received by OCD: 2/1/2022 2:50:06 PM Form C-141 State of New Mexico Page 3 Oil Conservation Division

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Site Assessment/Characterization

 $This information \ must be provided \ to \ the \ appropriate \ district \ of fice \ no \ later \ than \ 90 \ days \ after \ the \ release \ discovery \ date.$

What is the shallowest depth to groundwater beneath the area affected by the release?	<u>Unknown</u> (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	☐ Yes ☑ No
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)?	
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	☐ Yes ⊠ No
water well field? 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 ☐ 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?	1 100 / 110
Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and ver contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.	tical extents of soil
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 wel 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	ls.
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.

Received by OCD: 2/1/2022 2:50:06 PM. State of New Mexico Oil Conservation Division Page 4

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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:	Title:	
Signature:	Date:	
email:	Telephone:	
OCD Only		
Received by:	Date:	

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Remediation Plan

Remediation Plan Checklist: Each of the following items must be	a included in the plan
Remediation I lan Checknist. Each of the following tiems must be	e included in the plan.
☐ Detailed description of proposed remediation technique	
Scaled sitemap with GPS coordinates showing delineation point	ts
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 time	
	11 1 /
<u>Deferral Requests Only</u> : Each of the following items must be con	nfirmed as part of any request for deferral of remediation.
Contamination must be in areas immediately under or around predeconstruction.	roduction equipment where remediation could cause a major facility
Extents of contamination must be fully delineated.	
Contamination does not cause an imminent risk to human health	n, the environment, or groundwater.
	te to the best of my knowledge and understand that pursuant to OCD
	certain release notifications and perform corrective actions for releases
which may endanger public health or the environment. The accepta	
liability should their operations have failed to adequately investigate surface water, human health or the environment. In addition, OCD	
responsibility for compliance with any other federal, state, or local l	
responsibility for compliance with any other rederal, state, or local r	aws and/or regulations.
Printed Name:	Title:
Signature:	Date:
email:	Telephone:
OCD Only	
·	
Received by:	Date:
Approved Approved with Attached Conditions of	Approval
Signature:	Date:

Received by OCD: 2/1/2022 2:50:06 PM Form C-141 State of New Mexico Page 6 Oil Conservation Division

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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 19.15.29.1	1 NMAC
☐ Photographs of the remediated site prior to backfill or photos must be notified 2 days prior to liner inspection)	of the liner integrity if applicable (Note: appropriate OCD District office
☐ Laboratory analyses of final sampling (Note: appropriate ODC	C District office must be notified 2 days prior to final sampling)
☐ Description of remediation activities	
and regulations all operators are required to report and/or file certain may endanger public health or the environment. The acceptance of	nediate contamination that pose a threat to groundwater, surface water, a C-141 report does not relieve the operator of responsibility for tions. The responsible party acknowledges they must substantially neditions that existed prior to the release or their final land use in CD when reclamation and re-vegetation are complete.
Signature:	Date:
Signature:email:	Date: Telephone:
email:	
email: OCD Only Received by: Closure approval by the OCD does not relieve the responsible party	Telephone: Date: of liability should their operations have failed to adequately investigate and water, human health, or the environment nor does not relieve the responsible
OCD Only Received by: Closure approval by the OCD does not relieve the responsible party remediate contamination that poses a threat to groundwater, surface of the contamination of the conta	Date: Of liability should their operations have failed to adequately investigate and water, human health, or the environment nor does not relieve the responsible or regulations.
OCD Only Received by: Closure approval by the OCD does not relieve the responsible party remediate contamination that poses a threat to groundwater, surface party of compliance with any other federal, state, or local laws and/o	Date: Date: Date: Date: Date: Date: Date: Date:

Attachment 5

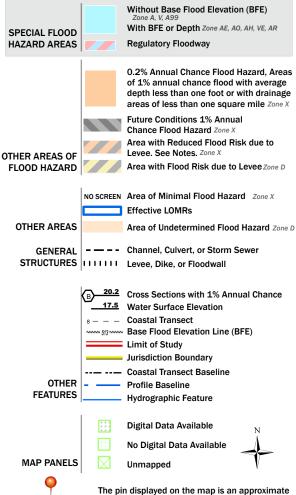
Site Characterization Documentation

Received by OCD: 2/1/2022 2:50:06 PM National Flood Hazard Layer FIRMette





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



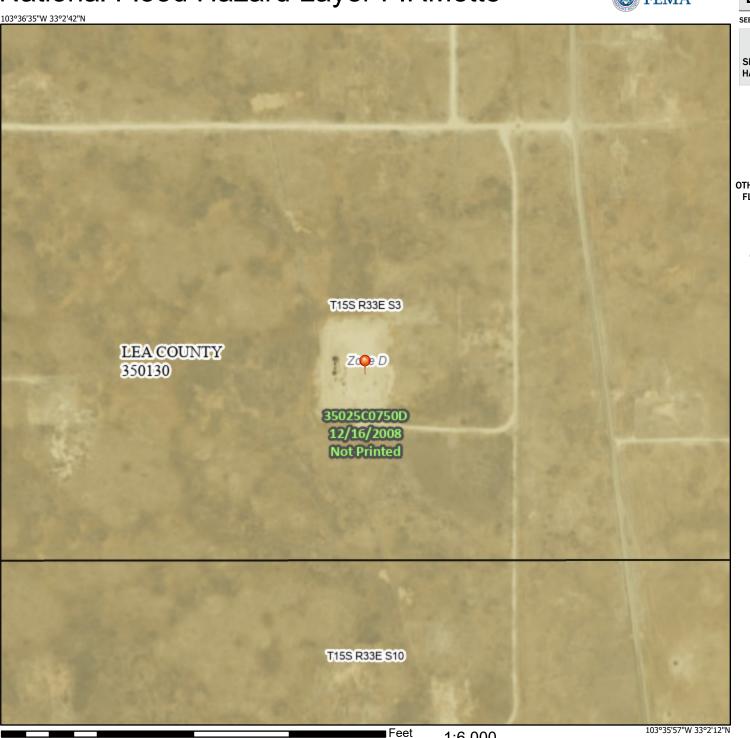
This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

point selected by the user and does not represent

an authoritative property location.

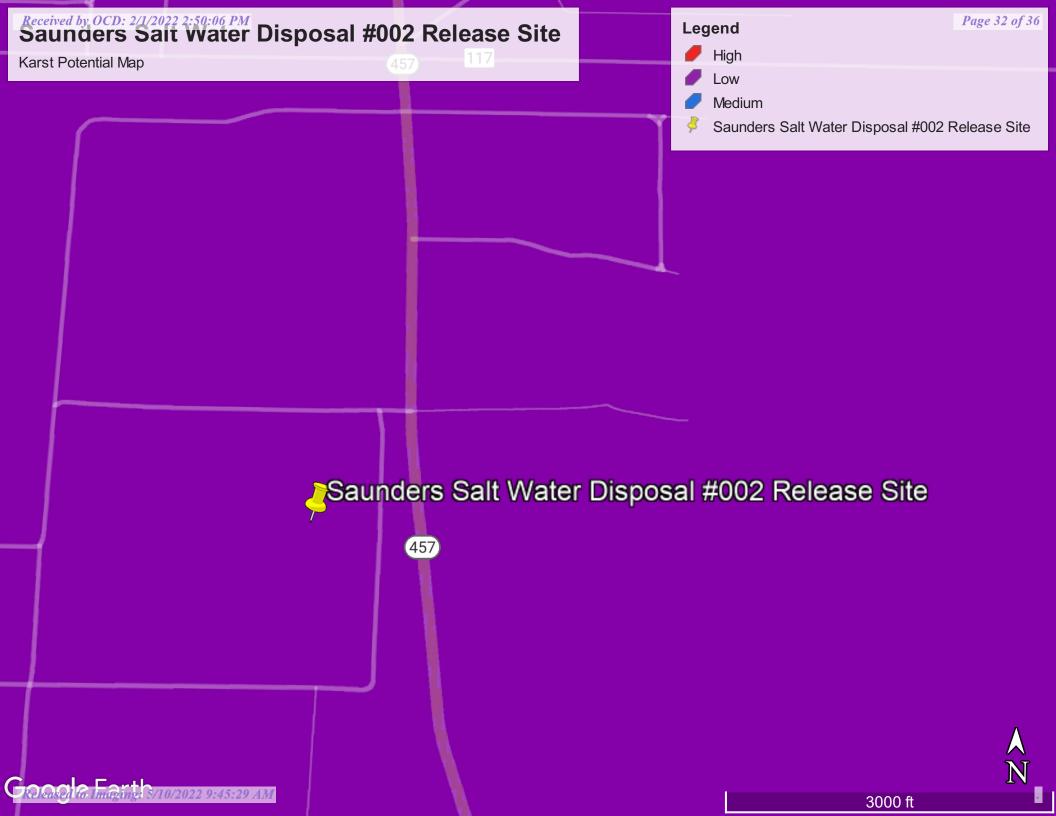
The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 1/18/2022 at 10:41 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by 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.

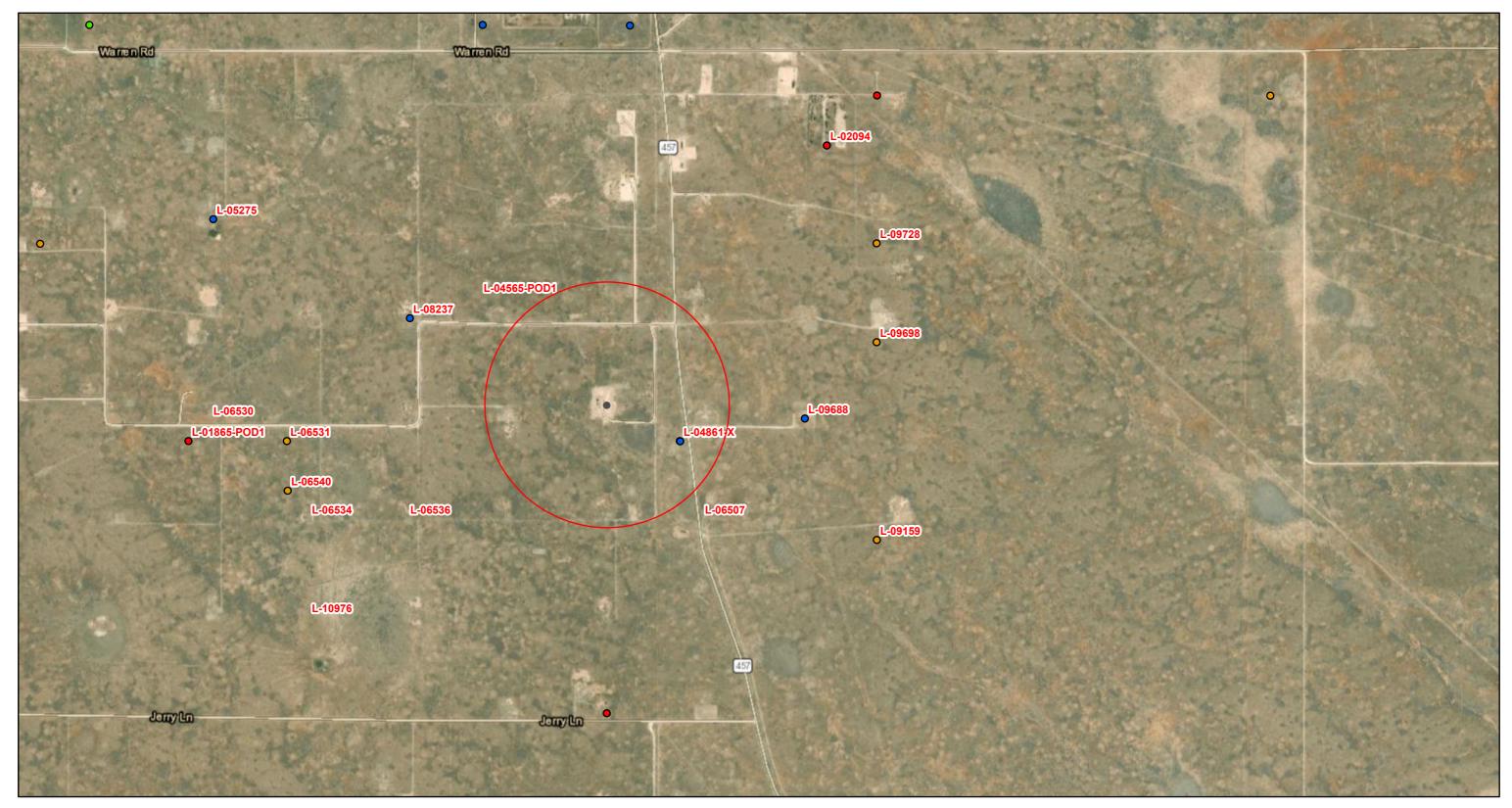


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Saunders Salt Water Disposal #002 Site Release

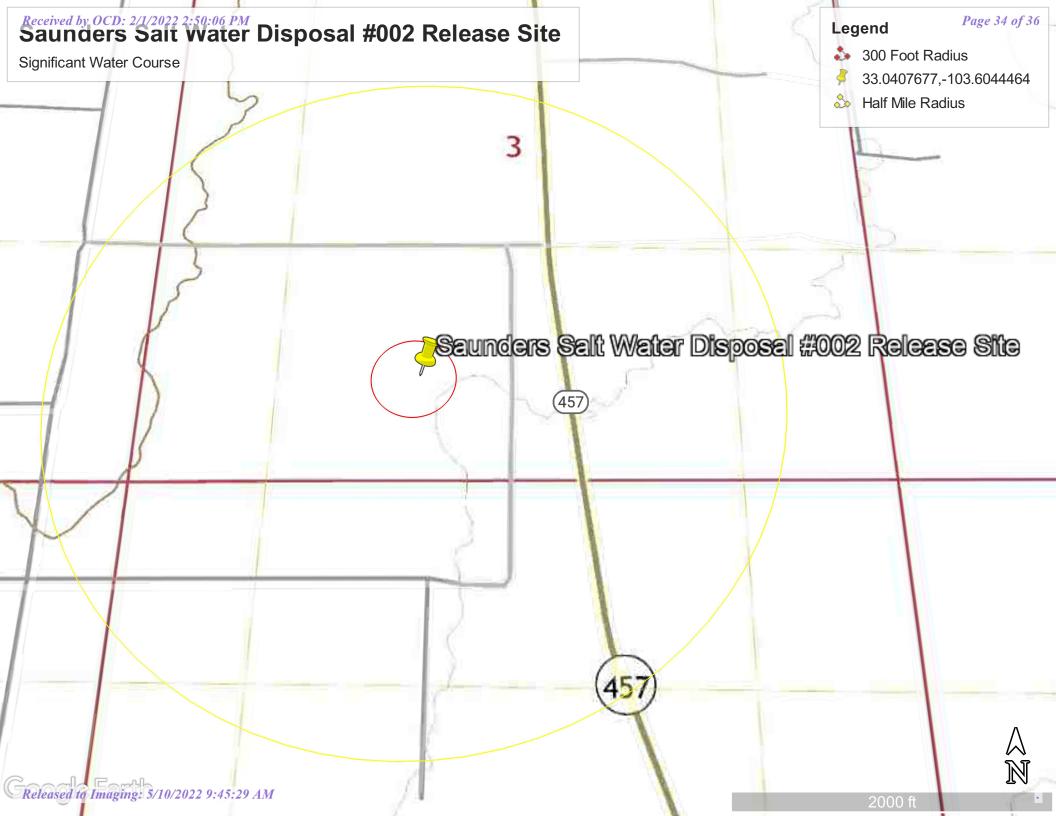


1/18/2022, 9:12:55 PM

GIS WATERS PODs • Pending • Plugged

ActiveCappedSiteBoundaries

Esri, HERE, iPC, U.S. Department of Energy Office of Legacy Management, Esri, HERE, Garmin, iPC, Maxar





Saunders Salt Water Disposal #002 Release Site



January 20, 2022

Wetlands

Estuarine and Marine Deepwater

Estuarine and Marine Wetland

Freshwater Emergent Wetland

Freshwater Pond

Lak

Lake Other

Freshwater Forested/Shrub Wetland

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.

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

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 77376

CONDITIONS

Operator:	OGRID:
Sabinal Energy Operating, LLC	328992
1780 HUGHES LANDING BLVD, STE	Action Number:
THE WOODLANDS, TX 77380	77376
	Action Type:
	[C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
jharimon	When submitting future reports regarding this release, please submit the calculations used or specific justification for the volumes reported on the initial C-141	5/10/2022