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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
Senior Project Manager
+1 832 380-7665
Valerie.Phipps@GHD.com

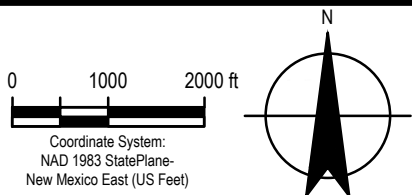
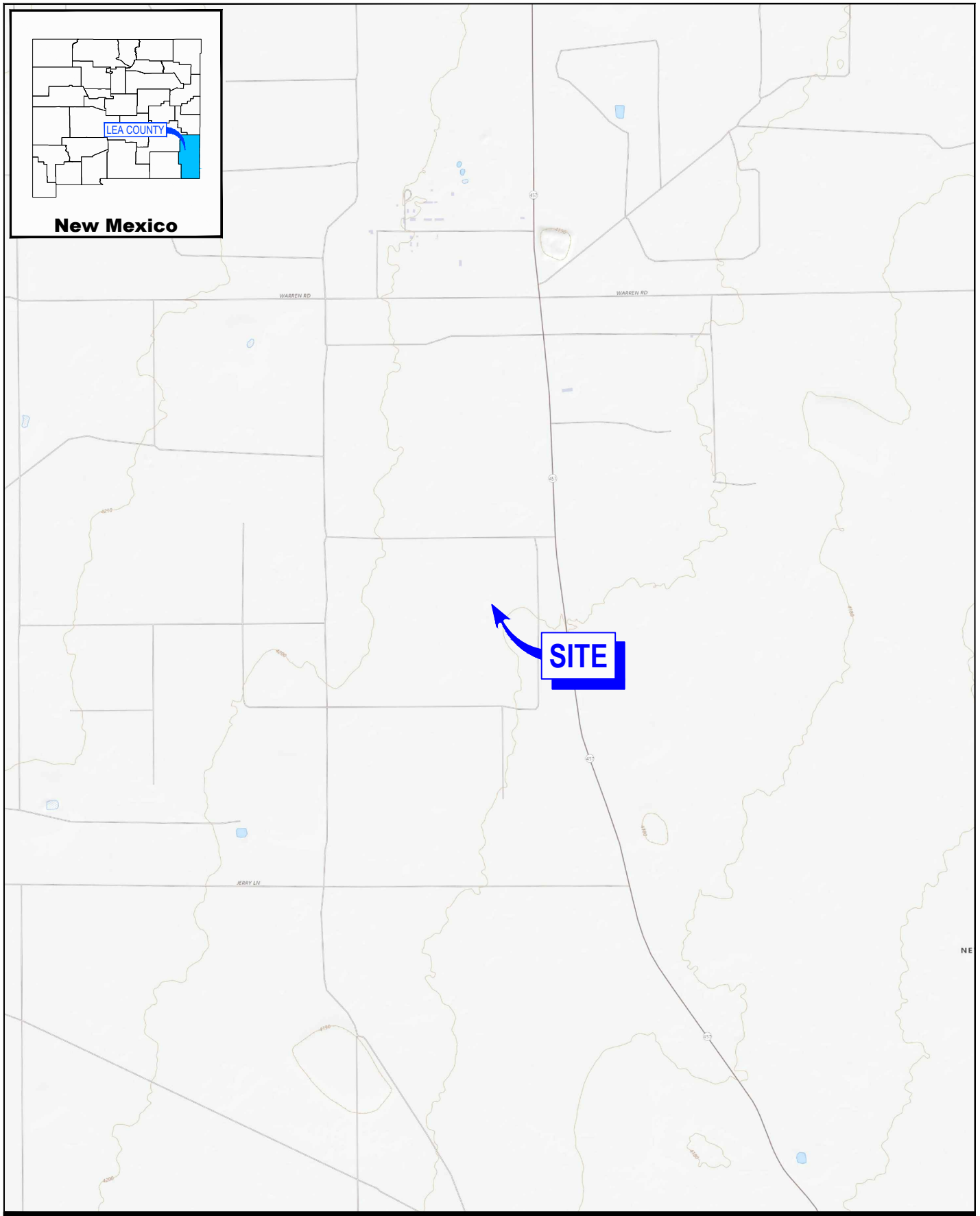


Phillip Cole
Environmental Scientist
+1 409 548-3479
Phillip.Cole@GHD.com

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



SABINAL ENERGY OPERATING LLC
LEA COUNTY, NEW MEXICO
SAUNDERS SALT WATER DISPOSAL #002
RELEASE SITE

Project No. 12571917
Date January 2022

SITE LOCATION MAP

FIGURE 1



Attachment 1

**C 141 (nSAP0335031519 and
nSAP0335640026)**

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

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-21396
Surface Owner: State of New Mexico	Mineral Owner: State of New Mexico
Lease No. SWD-14	

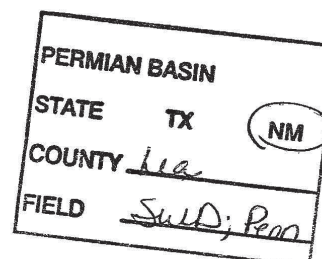
LOCATION OF RELEASE

Unit Letter L,K,M,N	Section: 3	Township: 15-S	Range 33-E	Feet from the 810'	North/South Line FSL	Feet from the 1980'	East/West Line FWL	County: LEA
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NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 110 barrels	Volume Recovered: 112 barrels
Source of Release: Lost packing gland on SWD pump	Date and Hour of Occurrence: 01/27/03 @ 6:00 AM	Date and Hour of Discovery: 1/27/03 @ 10:30 AM
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Hobbs OCD office voice mail	
By Whom? Andy Cobb, Energen Resources	Date and Hour 1/27/03 @ 4:10 PM	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	
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.		
Signature: <u>Andrew Cobb</u>		OIL CONSERVATION DIVISION
Printed Name: <u>Andrew Cobb</u>		Approved by District Supervisor:
Title: <u>HSE Coordinator</u>	Approval Date:	Expiration Date:
Date: <u>1-27-03</u> Phone: <u>915 687-1155</u>	Conditions of Approval:	Attached <input type="checkbox"/>

* 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: 162928
Contact Name:	Contact Telephone:
Contact email:	Incident # nSAP0230839785
Contact mailing address:	

Location of Release Source

Latitude 33.0407677 Longitude -103.6044464
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: SAUNDERS SALT WATER DISPOSAL #002	Site Type: Produced Water Release
Date Release Discovered: 9/18/2002	API# 30-025-01218

Unit Letter	Section	Township	Range	County
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)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 1235	Volume Recovered (bbls) 1210
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input 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: 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.

State of New Mexico
Oil Conservation Division

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Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? It is considered a major release because of the 1235 (bbls) released of produced water.
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? Yes, by Industry Rep, when and means unknown.	

Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why: 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.	
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: <u>Kyle Sanders</u>	Title: <u>Manager – Environmental, Health, and Safety</u>
Signature: <u>Kyle Sanders</u>	Date: <u>02/01/2022</u>
email: <u>kyles@sabinalenergy.com</u>	Telephone: <u>346-224-9343</u>
<u>OCD Only</u> Received by: _____ Date: _____	

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

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

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

- ☐ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☐ Field data
- ☐ Data table of soil contaminant concentration data
- ☐ Depth to water determination
- ☐ Determination of water sources and significant watercourses within 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.

State of New Mexico
Oil Conservation Division

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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: _____

Incident ID	
District RP	
Facility ID	
Application ID	

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: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

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

Signature: _____ Date: _____

Incident ID	
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 ODC District office must be notified 2 days prior to final sampling)
- ☐ Description of remediation activities

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

Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

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

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____

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	
District RP	
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Application ID	

Release Notification

Responsible Party

Responsible Party: Energen Resources Group	OGRID: 162928
Contact Name:	Contact Telephone:
Contact email:	Incident # nSAP0230537114
Contact mailing address	

Location of Release Source

Latitude: 33.0407677 Longitude: -103.6044464
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: SAUNDERS SALT WATER DISPOSAL #002	Site Type: Salt Water Disposal
Date Release Discovered: 10/25/2002	API# 30-025-01218

Unit Letter	Section	Township	Range	County
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)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 80	Volume Recovered (bbls) 123
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input 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:

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.

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? Equipment Failure from the fuel line injection
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? Yes, by Industry Rep, when 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

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why: 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.	
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: <u>Kyle Sanders</u>	Title: <u>Manager – Environmental, Health, and Safety</u>
Signature: <u>Kyle Sanders</u>	Date: <u>02/01/2022</u>
email: <u>kyles@sabinalenergy.com</u>	Telephone: <u>346-224-9343</u>
<u>OCD Only</u> Received by: _____ Date: _____	

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

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

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

- ☐ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☐ Field data
- ☐ Data table of soil contaminant concentration data
- ☐ Depth to water determination
- ☐ Determination of water sources and significant watercourses within 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.

State of New Mexico
Oil Conservation Division

Page 4

Incident ID	
District RP	
Facility ID	
Application ID	

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Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

Incident ID	
District RP	
Facility ID	
Application ID	

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: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

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

Signature: _____ Date: _____

Incident ID	
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 ODC District office must be notified 2 days prior to final sampling)
- ☐ Description of remediation activities

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

Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

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

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____

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	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party: Energen Resource Group	OGRID: 162928
Contact Name:	Contact Telephone:
Contact email:	Incident # nSAP0232539443
Contact mailing address	

Location of Release Source

Latitude: 33.0407677 Longitude: -103.6044464
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Saunders Salt Water Disposal #002	Site Type: Salt Water Disposal
Date Release Discovered: 11/11/2002	API# 30-025-01218

Unit Letter	Section	Township	Range	County
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)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 50	Volume Recovered (bbls) 70
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input 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:

clamp used to repair previous spill failed. Area affected was in low spot, line was shut in and free liquids in area were removed.

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? Yes 50 (bbl) of salt water released
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? Yes, by Industry Rep, when 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

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why: 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.	
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.	
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Printed Name: <u>Kyle Sanders</u>	Title: <u>Manager – Environmental, Health, and Safety</u>
Signature: <u>Kyle Sanders</u>	Date: <u>02/01/2022</u>
email: <u>kyles@sabinalenergy.com</u>	Telephone: <u>346-224-9343</u>
<u>OCD Only</u> Received by: _____ Date: _____	

Incident ID	
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.

<u>What is the shallowest depth to groundwater beneath the area affected by the release?</u>	Unknown (ft bgs) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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<u>Are the lateral extents of the release overlying an unstable area such as karst geology?</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<u>Are the lateral extents of the release within a 100-year floodplain?</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<u>Did the release impact areas not on an exploration, development, production, or storage site?</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

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

- ☐ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
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State of New Mexico
Oil Conservation Division

Page 4

Incident ID	
District RP	
Facility ID	
Application ID	

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Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

Incident ID	
District RP	
Facility ID	
Application ID	

Remediation Plan

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Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

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

Signature: _____ Date: _____

Incident ID	
District RP	
Facility ID	
Application ID	

Closure

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Printed Name: _____ Title: _____

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OCD Only

Received by: _____ Date: _____

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Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____

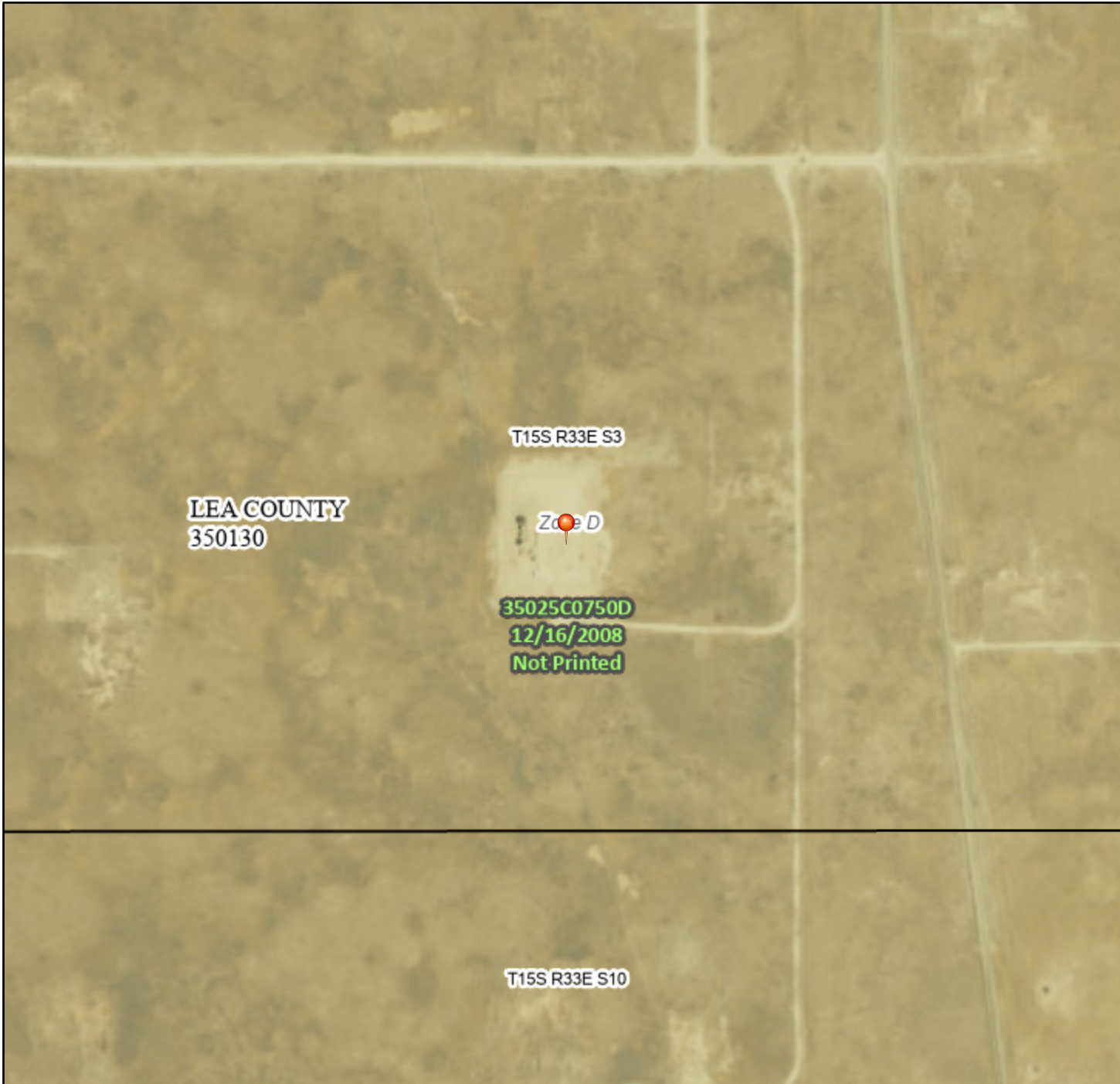
Attachment 5

Site Characterization Documentation

National Flood Hazard Layer FIRMMette



103°36'35"W 33°2'42"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 D
		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		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 **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.

Saunders Salt Water Disposal #002 Release Site

Karst Potential Map

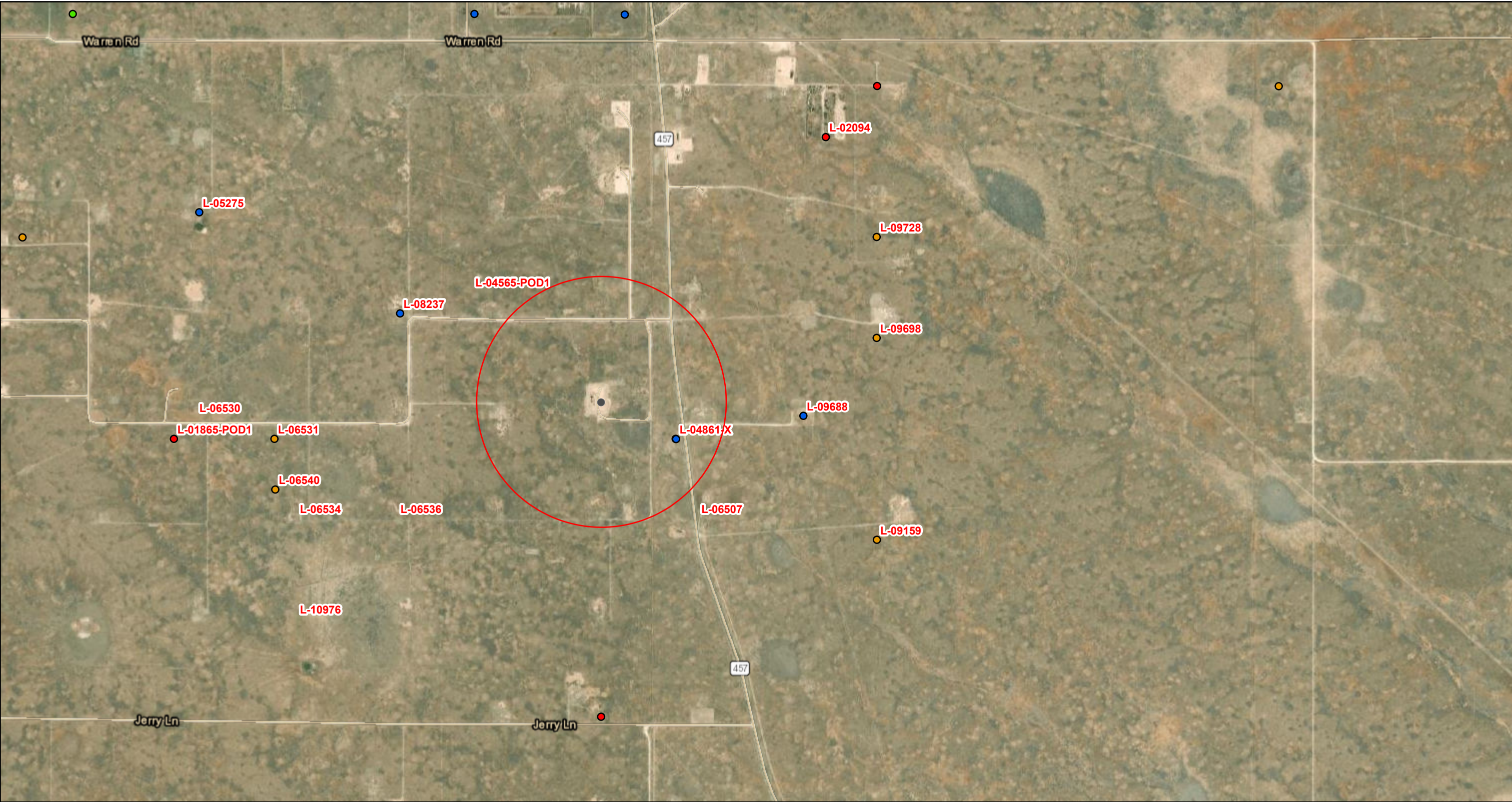
Legend

- High
- Low
- Medium
- Saunders Salt Water Disposal #002 Release Site

Saunders Salt Water Disposal #002 Release Site



Saunders Salt Water Disposal #002 Site Release

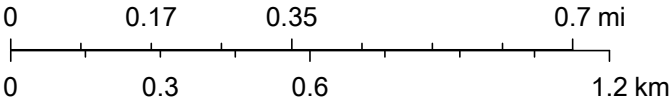


1/18/2022, 9:12:55 PM

GIS WATERS PODs

- Pending
- Plugged
- Active
- Capped
- SiteBoundaries

1:18,056






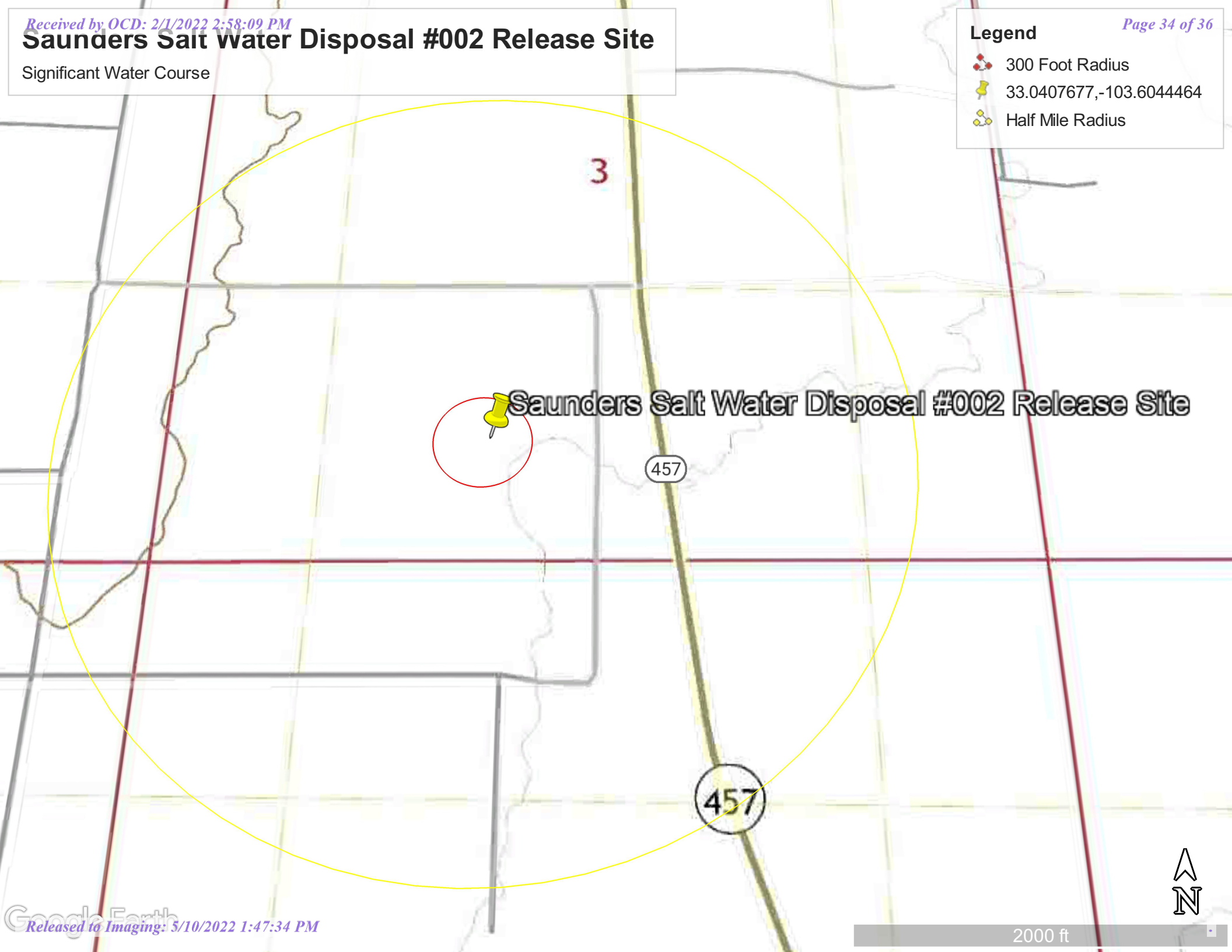
Esri, HERE, iPC, U.S. Department of Energy Office of Legacy Management, Esri, HERE, Garmin, iPC, Maxar

Saunders Salt water Disposal #002 Release Site

Significant Water Course

Legend

-  300 Foot Radius
-  33.0407677,-103.6044464
-  Half Mile Radius





U.S. Fish and Wildlife Service

National Wetlands Inventory

Saunders Salt Water Disposal #002
Release Site

January 20, 2022

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.

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 77385

CONDITIONS

Operator: Sabinal Energy Operating, LLC 1780 HUGHES LANDING BLVD, STE THE WOODLANDS, TX 77380	OGRID: 328992
	Action Number: 77385
	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