



February 14, 2023

New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**Re: Closure Request
Rojo 22-25 Tank Battery
Incident Numbers nAPP2206753386 and nAPP2209076202
Lea County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of BTA Oil Producers, LLC (BTA), has prepared this *Closure Request* to document assessment, excavation, and soil sampling activities performed at the Rojo 22-25 Tank Battery (Site). The purpose of the Site assessment, excavation, and soil sampling activities was to address impacts to soil following two release events at the Site. Based on the excavation activities completed and laboratory analytical results from the soil sampling events, BTA is submitting this *Closure Request*, describing remediation that has occurred and requesting closure for Incident Numbers nAPP2206753386 and nAPP2209076202.

SITE DESCRIPTION AND RELEASE SUMMARY

The Site is located in Unit N, Section 22, Township 25 South, Range 33 East, in Lea County, New Mexico (32.11186°, -103.56366°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM).

nAPP2206753386

On March 7, 2022, a fitting failed on the separator, resulting in the release of approximately 7 barrels (bbls) of produced water and 5 bbls of crude oil onto the well pad. A vacuum truck was dispatched to the Site to recover free-standing fluids; approximately 6 bbls of produced water and 4 bbls of crude oil were recovered. BTA reported the release to the New Mexico Oil and Conservation Division (NMOCD) on March 8, 2022 and submitted a Release Notification Form C-141 (Form C-141). The release was assigned Incident Number nAPP2206753386.

nAPP2209076202

On March 17, 2022, a valve failed on the separator, resulting in the release of approximately 10 bbls of crude oil onto the well pad. A vacuum truck was dispatched to the Site to recover free-standing fluids; approximately 3 bbls of crude oil were recovered. BTA reported the release to the NMOCD on March 31, 2022 and submitted a Form C-141. The release was assigned Incident Number nAPP2209076202.

BTA Oil Producers, LLC
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SITE CHARACTERIZATION AND CLOSURE CRITERIA

The Site was characterized to assess the applicability of Table I, Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29 (19.15.29) of the New Mexico Administrative Code (NMAC). Results from the characterization desktop review are presented on page 3 of the Form C-141, Site Assessment/Characterization. Potential Site receptors are identified on Figure 1.

Depth to groundwater at the Site is estimated to be between 51 feet and 100 feet below ground surface (bgs) based on a recent boring drilled for determination of regional groundwater depth. On January 3, 2023, a borehole (BH01) was advanced to a depth of 60 feet bgs via air rotary drill rig. The borehole was located approximately 0.25 miles southeast of the Site and is depicted on Figure 1. A field geologist logged and described soils continuously. The borehole lithologic/soil sampling log is included in Appendix A. The borehole was left open for over 72 hours to allow for potential slow infill of groundwater. After the 72-hour waiting period without observing groundwater, it was confirmed that groundwater beneath the Site is between 51 feet and 100 feet bgs. The borehole was properly abandoned using drill cuttings and hydrated bentonite chips. All wells used for depth to groundwater determination are depicted on Figure 1 and the referenced well records are included in Appendix A.

The closest continuously flowing or significant watercourse to the Site is a stream, located approximately 10,980 feet north of the Site. The Site is greater than 200 feet from a lakebed, sinkhole, or playa lake and greater than 300 feet from an occupied residence, school, hospital, institution, church, or wetland. The Site is greater than 1,000 feet to a freshwater well or spring and is not within a 100-year floodplain or overlying a subsurface mine. The Site is not underlain by unstable geology (low potential karst designation area). Site receptors are identified on Figure 1.

Based on the results of the Site Characterization, the following NMOCD Table I Closure Criteria (Closure Criteria) apply:

- Benzene: 10 milligrams per kilogram (mg/kg)
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg
- Total petroleum hydrocarbons (TPH) -gasoline range organics (GRO) and TPH-diesel range organics (DRO): 1,000 mg/kg
- TPH: 2,500 mg/kg
- Chloride: 10,000 mg/kg

SITE ASSESSMENT ACTIVITIES AND ANALYTICAL RESULTS

On October 17, 2022, Ensolum personnel were at the Site to evaluate the releases based on information provided on the Form C-141s and visual observations. The releases overlapped so a single release extent was mapped utilizing a handheld Global Positioning System (GPS) unit. In addition, six assessment soil samples (SS01 through SS06) were collected within and around the release extents at a depth of approximately 0.5 feet bgs to assess shallow soil for the presence or absence of impacts from the two releases. The soil samples were field screened for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID) and chloride utilizing Hach® chloride QuanTab® test strips. The soil sample locations were mapped utilizing a GPS unit and are depicted on Figure 2. Photographic documentation was completed during the Site visit and a photographic log is included in Appendix B.

The soil samples were placed directly into pre-cleaned glass jars, labeled with the location, date, time, sampler name, method of analysis, and immediately placed on ice. The soil samples were transported under strict chain-of-custody procedures to Cardinal Laboratories (Cardinal) in Hobbs, New Mexico, for

BTA Oil Producers, LLC
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analysis of the following chemicals of concern (COCs): BTEX following United States Environmental Protection Agency (EPA) Method 8021B; TPH-GRO, TPH-DRO, and TPH-oil range organics (ORO) following EPA Method 8015M/D; and chloride following EPA Method SM4500.

Laboratory analytical results for soil sample SS01, collected within the release extent, indicated TPH concentrations exceeded the Closure Criteria. Laboratory analytical results for soil samples SS02 through SS06 indicated all COC concentrations were compliant with the Closure Criteria. The laboratory analytical results are summarized on Table 1 and the complete laboratory analytical reports are included as Appendix C.

Based on visible staining in the release areas and elevated field screening results, excavation activities appeared to be warranted.

EXCAVATION ACTIVITIES AND ANALYTICAL RESULTS

On December 15, 2022, Ensolum personnel were at the Site to oversee excavation activities. Impacted soil was excavated as indicated by visible staining, field screenings and laboratory analytical results. Excavation activities were performed via hand shoveling and a hydrovac truck. To direct excavation activities, soil was screened for VOCs and chloride. The excavation was completed to a depth of 1-foot bgs.

Following the excavation activities, 5-point composite samples were collected from the floor and sidewalls of the excavation. The 5-point composite samples were collected by placing five equivalent aliquots of soil into a 1-gallon, resealable plastic bag and homogenizing the samples by thoroughly mixing. Composite soil samples FS01 and FS02 were collected from the floor of the excavation at a depth of 1-foot bgs. Composite soil sample SW01 was collected from the sidewall of the excavation. Due to the shallow nature of the excavation, one sidewall sample was collected for the full parameter, which also included a portion of the floor based on the sloped sidewall configuration. The soil samples were collected, handled, and analyzed following the same procedures as described above. The excavation extent and excavation soil sample locations were mapped utilizing a handheld GPS unit and are depicted on Figure 3. A photographic log of the excavation is included as Appendix B.

Laboratory analytical results for excavation soil samples FS01, FS02, and SW01, collected from the final excavation extent, indicated all COC concentrations were compliant with the Site Closure Criteria. The laboratory analytical results are summarized on Table 1 and the complete laboratory analytical reports are included as Appendix C.

The excavation measured approximately 415 square feet in areal extent. A total of approximately 15 cubic yards of impacted soil was removed during the excavation activities. The impacted soil was transported and properly disposed of at the R360 Disposal Facility located in Hobbs, New Mexico. After completion of confirmation sampling, the excavation was secured with fencing.

CLOSURE REQUEST


Site assessment and excavation activities were conducted at the Site to address impacted soil resulting from two release events at the Site. Laboratory analytical results for the excavation soil samples indicated all COC concentrations were compliant with the Site Closure Criteria. In addition, laboratory analytical results for lateral delineation soil samples SS04 through SS06 indicated all COC concentrations were compliant with the strictest Table I Closure Criteria and successfully defined the release extent. Based on the soil sample analytical results, no further remediation appears to be required with the exception of properly backfilling and contouring the excavated area on pad.

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Depth to groundwater is estimated to be between 51 feet and 100 feet bgs and no other sensitive receptors were identified near the Site. BTA believes these remedial actions are protective of human health, the environment, and groundwater. As such, BTA respectfully requests closure for Incident Numbers nAPP2206753386 and nAPP2209076202. The Form C-141 is included as Appendix E.

If you have any questions or comments, please contact Ms. Tacoma Morrissey at (337) 257-8307 or tmorrissey@ensolum.com.

Sincerely,
Ensolum, LLC



Hadlie Green
Staff Geologist



Tacoma Morrissey
Senior Geologist

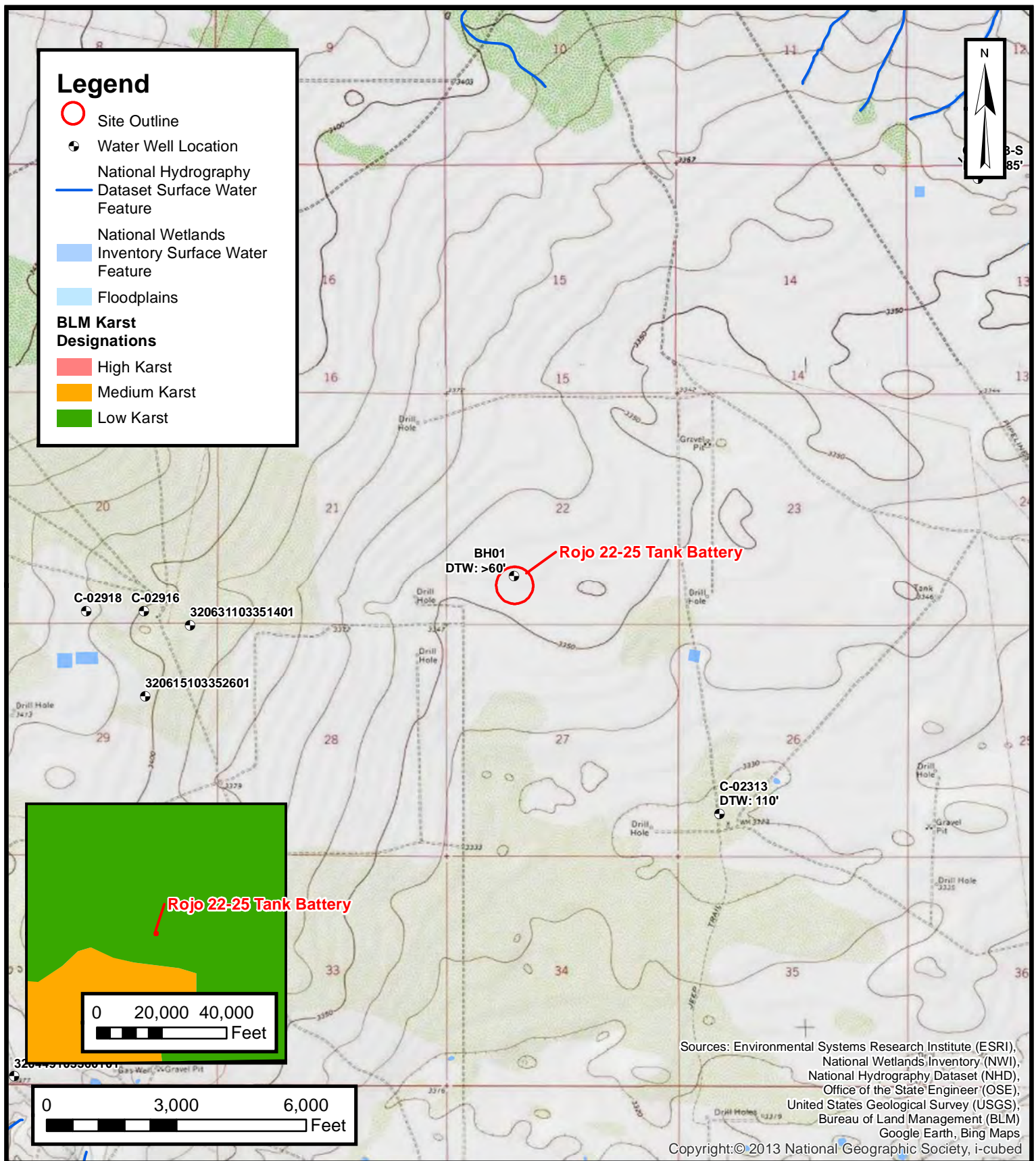
cc: Bob Hall, BTA Oil Producers, LLC
Bureau of Land Management

Appendices:

Figure 1	Site Location Map
Figure 2	Delineation Soil Sample Locations
Figure 3	Excavation Soil Sample Locations
Table 1	Soil Sample Analytical Results
Appendix A	Referenced Well Records
Appendix B	Photographic Log
Appendix C	Laboratory Analytical Reports & Chain-of-Custody Documentation
Appendix D	Final C-141



FIGURES



ENSOLUM
Environmental, Engineering and
Hydrogeologic Consultants

Site Receptor Map

BTA Oil Producers, LLC
Rojo 22-25 Tank Battery
nAPP2206753386 & nAPP2209076202
Unit Letter N, Sec 22, T25S, R33E
Lea County, New Mexico

FIGURE
1



Delineation Soil Sample Sample Locations

BTA Oil Producers, LLC
Rojo 22-25 Tank Battery
nAPP2206753386 & nAPP2209076202
Unit Letter N, Sec 22, T25S, R33E
Lea County, New Mexico

FIGURE
2



Excavation Soil Sample Locations

BTA Oil Producers, LLC
Rojo 22-25 Tank Battery
nAPP2206753386 & nAPP2209076202
Unit Letter N, Sec 22, T25S, R33E
Lea County, New Mexico

FIGURE
3



TABLES



TABLE 1
SOIL SAMPLE ANALYTICAL RESULTS
 Rojo 22-25 Tank Battery
 BTA Oil Producers, LLC
 Lea County, New Mexico

Sample I.D.	Sample Date	Sample Depth (feet bgs)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)	TPH ORO (mg/kg)	GRO+DRO (mg/kg)	Total TPH (mg/kg)	Chloride (mg/kg)
NMOCD Table I Closure Criteria (NMAC 19.15.29)			10	50	NE	NE	NE	1,000	2,500	10,000
Delineation Soil Samples										
SS01	10/17/2022	0.5	<0.050	<0.300	<10.0	2,330	395	2,330	2,725	6,880
SS02	10/17/2022	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	96.0
SS03	10/17/2022	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	16.0
SS04	10/17/2022	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	<16.0
SS05	10/17/2022	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	<16.0
SS06	10/17/2022	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	16.0
Excavation Soil Samples										
FS01	12/15/2022	1	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	896
FS02	12/15/2022	1	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	48.0
SW01	12/15/2022	0-1	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	80.0

Notes:

bgs: below ground surface

mg/kg: milligrams per kilogram

NMOCD: New Mexico Oil Conservation Division

BTEX: Benzene, Toluene, Ethylbenzene, and Xylenes

Concentrations in bold exceed the NMOCD Table I Closure Criteria or reclamation standard where applicable.

GRO: Gasoline Range Organics

DRO: Diesel Range Organics


ORO: Oil Range Organics

TPH: Total Petroleum Hydrocarbon



APPENDIX A

Referenced Well Records

								Sample Name: BH01		Date: 1/3/2023	
								Site Name: Rojo 22-25 Tank Battery			
								Incident Number: nAPP2206753386 & nAPP2209076202			
								Job Number: 03C2012008			
LITHOLOGIC / SOIL SAMPLING LOG								Logged By: CS / MR		Method: Air Rotary	
Coordinates: 32.107784, -103.562235								Hole Diameter: 6"		Total Depth: 60'	
Comments: Soil boring was advanced to a total depth of 60' bgs. No water was observed within the soil boring after at least 72 hours. On 1/16/2023 the soil boring was plugged and abandoned using hydrated bentonite chips.											
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions			
						0	CCHE	(0-30'), CALICHE, coarse grain, well graded, white to tan, dry, no stain or odor.			
Dry	-	-	N	-	-	10					
Dry	-	-	N	-	-	20		@20' color change to pink/tan			
Dry	-	-	N	-	-	30	SP-SM	(30-78'), SAND, medium to fine grain, poorly graded with trace caliche nodules, red to orange, dry, no stain, no odor.			
Dry	-	-	N	-	-	40					
Dry	-	-	N	-	-	50		@50', slightly cohesive with trace clay			
Dry	-	-	N	-	-	60		NOTE: refusal @ 60' using air rotary drill rig due to abundant sand.			
Total Depth @ 60 feet bgs											



APPENDIX B

Photographic Log

**Photographic Log**

BTA Oil Producers, LLC

Rojo 22-25 Tank Battery

Incident Numbers nAPP2206753386 & nAPP2209076202



Photograph: 1 Date: 3/7/2022
Description: Release footprint
View: West



Photograph: 2 Date: 10/17/2022
Description: Initial assessment activities
View: Northwest



Photograph: 3 Date: 12/15/2022
Description: Excavation activities
View: West



Photograph: 4 Date: 12/15/2022
Description: Excavation activities
View: Southeast



APPENDIX C

Laboratory Analytical Reports & Chain of Custody Documentation



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

October 24, 2022

HADLIE GREEN

ENSOLUM, LLC

705 W WADLEY AVE.

MIDLAND, TX 79705

RE: ROJO 22-25 TANK BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 10/18/22 14:33.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

ENSOLUM, LLC
 HADLIE GREEN
 705 W WADLEY AVE.
 MIDLAND TX, 79705
 Fax To:

Received:	10/18/2022	Sampling Date:	10/17/2022
Reported:	10/24/2022	Sampling Type:	Soil
Project Name:	ROJO 22-25 TANK BATTERY	Sampling Condition:	Cool & Intact
Project Number:	03C2012008	Sample Received By:	Tamara Oldaker
Project Location:	BTA		

Sample ID: SS01 .5' (H224889-01)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/20/2022	ND	1.92	96.1	2.00	2.27	
Toluene*	<0.050	0.050	10/20/2022	ND	2.10	105	2.00	0.197	
Ethylbenzene*	<0.050	0.050	10/20/2022	ND	1.96	98.0	2.00	1.79	
Total Xylenes*	<0.150	0.150	10/20/2022	ND	5.91	98.4	6.00	1.83	
Total BTEX	<0.300	0.300	10/20/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 97.9 % 69.9-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	6880	16.0	10/19/2022	ND	432	108	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/19/2022	ND	209	105	200	5.87	
DRO >C10-C28*	2330	10.0	10/19/2022	ND	210	105	200	5.25	
EXT DRO >C28-C36	395	10.0	10/19/2022	ND					

Surrogate: 1-Chlorooctane 96.2 % 45.3-161

Surrogate: 1-Chlorooctadecane 112 % 46.3-178

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

ENSOLUM, LLC
 HADLIE GREEN
 705 W WADLEY AVE.
 MIDLAND TX, 79705
 Fax To:

Received: 10/18/2022
 Reported: 10/24/2022
 Project Name: ROJO 22-25 TANK BATTERY
 Project Number: 03C2012008
 Project Location: BTA

Sampling Date: 10/17/2022
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: SS02 .5' (H224889-02)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	10/20/2022	ND	1.92	96.1	2.00	2.27		
Toluene*	<0.050	0.050	10/20/2022	ND	2.10	105	2.00	0.197		
Ethylbenzene*	<0.050	0.050	10/20/2022	ND	1.96	98.0	2.00	1.79		
Total Xylenes*	<0.150	0.150	10/20/2022	ND	5.91	98.4	6.00	1.83		
Total BTEX	<0.300	0.300	10/20/2022	ND						

Surrogate: 4-Bromofluorobenzene (PID) 97.5 % 69.9-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	96.0	16.0	10/19/2022	ND	432	108	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/21/2022	ND	209	105	200	5.87	
DRO >C10-C28*	<10.0	10.0	10/21/2022	ND	210	105	200	5.25	
EXT DRO >C28-C36	<10.0	10.0	10/21/2022	ND					

Surrogate: 1-Chlorooctane 79.4 % 45.3-161

Surrogate: 1-Chlorooctadecane 94.2 % 46.3-178

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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 HADLIE GREEN
 705 W WADLEY AVE.
 MIDLAND TX, 79705
 Fax To:

Received: 10/18/2022
 Reported: 10/24/2022
 Project Name: ROJO 22-25 TANK BATTERY
 Project Number: 03C2012008
 Project Location: BTA

Sampling Date: 10/17/2022
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: SS03 .5' (H224889-03)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	10/20/2022	ND	1.92	96.1	2.00	2.27		
Toluene*	<0.050	0.050	10/20/2022	ND	2.10	105	2.00	0.197		
Ethylbenzene*	<0.050	0.050	10/20/2022	ND	1.96	98.0	2.00	1.79		
Total Xylenes*	<0.150	0.150	10/20/2022	ND	5.91	98.4	6.00	1.83		
Total BTEX	<0.300	0.300	10/20/2022	ND						

Surrogate: 4-Bromofluorobenzene (PID) 97.1 % 69.9-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	10/19/2022	ND	432	108	400	3.77	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/19/2022	ND	209	105	200	5.87	
DRO >C10-C28*	<10.0	10.0	10/19/2022	ND	210	105	200	5.25	
EXT DRO >C28-C36	<10.0	10.0	10/19/2022	ND					

Surrogate: 1-Chlorooctane 103 % 45.3-161

Surrogate: 1-Chlorooctadecane 111 % 46.3-178

Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

ENSOLUM, LLC
 HADLIE GREEN
 705 W WADLEY AVE.
 MIDLAND TX, 79705
 Fax To:

Received: 10/18/2022
 Reported: 10/24/2022
 Project Name: ROJO 22-25 TANK BATTERY
 Project Number: 03C2012008
 Project Location: BTA

Sampling Date: 10/17/2022
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: SS04 .5' (H224889-04)

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/20/2022	ND	1.92	96.1	2.00	2.27	
Toluene*	<0.050	0.050	10/20/2022	ND	2.10	105	2.00	0.197	
Ethylbenzene*	<0.050	0.050	10/20/2022	ND	1.96	98.0	2.00	1.79	
Total Xylenes*	<0.150	0.150	10/20/2022	ND	5.91	98.4	6.00	1.83	
Total BTEX	<0.300	0.300	10/20/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 98.2 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	10/19/2022	ND	432	108	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/19/2022	ND	209	105	200	5.87	
DRO >C10-C28*	<10.0	10.0	10/19/2022	ND	210	105	200	5.25	
EXT DRO >C28-C36	<10.0	10.0	10/19/2022	ND					

Surrogate: 1-Chlorooctane 96.3 % 45.3-161

Surrogate: 1-Chlorooctadecane 103 % 46.3-178

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

ENSOLUM, LLC
 HADLIE GREEN
 705 W WADLEY AVE.
 MIDLAND TX, 79705
 Fax To:

Received: 10/18/2022
 Reported: 10/24/2022
 Project Name: ROJO 22-25 TANK BATTERY
 Project Number: 03C2012008
 Project Location: BTA

Sampling Date: 10/17/2022
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: SS05 .5' (H224889-05)

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	10/20/2022	ND	1.92	96.1	2.00	2.27		
Toluene*	<0.050	0.050	10/20/2022	ND	2.10	105	2.00	0.197		
Ethylbenzene*	<0.050	0.050	10/20/2022	ND	1.96	98.0	2.00	1.79		
Total Xylenes*	<0.150	0.150	10/20/2022	ND	5.91	98.4	6.00	1.83		
Total BTEX	<0.300	0.300	10/20/2022	ND						

Surrogate: 4-Bromofluorobenzene (PID) 98.0 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	10/19/2022	ND	432	108	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/19/2022	ND	209	105	200	5.87	
DRO >C10-C28*	<10.0	10.0	10/19/2022	ND	210	105	200	5.25	
EXT DRO >C28-C36	<10.0	10.0	10/19/2022	ND					

Surrogate: 1-Chlorooctane 92.2 % 45.3-161

Surrogate: 1-Chlorooctadecane 99.4 % 46.3-178

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

ENSOLUM, LLC
 HADLIE GREEN
 705 W WADLEY AVE.
 MIDLAND TX, 79705
 Fax To:

Received: 10/18/2022
 Reported: 10/24/2022
 Project Name: ROJO 22-25 TANK BATTERY
 Project Number: 03C2012008
 Project Location: BTA

Sampling Date: 10/17/2022
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: SS06 .5' (H224889-06)

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/20/2022	ND	1.92	96.1	2.00	2.27	
Toluene*	<0.050	0.050	10/20/2022	ND	2.10	105	2.00	0.197	
Ethylbenzene*	<0.050	0.050	10/20/2022	ND	1.96	98.0	2.00	1.79	
Total Xylenes*	<0.150	0.150	10/20/2022	ND	5.91	98.4	6.00	1.83	
Total BTEX	<0.300	0.300	10/20/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 98.4 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	16.0	16.0	10/19/2022	ND	432	108	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/19/2022	ND	209	105	200	5.87	
DRO >C10-C28*	<10.0	10.0	10/19/2022	ND	210	105	200	5.25	
EXT DRO >C28-C36	<10.0	10.0	10/19/2022	ND					

Surrogate: 1-Chlorooctane 95.6 % 45.3-161

Surrogate: 1-Chlorooctadecane 104 % 46.3-178

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Celey D. Keene, Lab Director/Quality Manager

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Notes and Definitions

QR-03	The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to matrix interference. QC batch accepted based on LCS and/or LCSD recovery and/or RPD values.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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

Celey D. Keene, Lab Director/Quality Manager



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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: Ensolum, LLC	BILL TO		ANALYSIS REQUEST	
----------------------------	---------	--	------------------	--

Project Manager: Holly Green	P.O. #:
Address: 601 N. Marland St. STE 400	Company: BTA ON
City: Midland	Attn: Bob Hall
State: TX Zip: 79701	Address: 104 S Pecan St.
Phone #: 505 796 2608	City: Midland
Fax #: 505 557 8995	State: TX Zip: 79701
Project #: 03C2012008	Project Owner: BTA
Project Name: Rojo 22-25 Tank Battery	Phone #: 432-312-2203
Project Location:	Fax #:
Sampler Name: Connor Whitman	

FOR LAB USE ONLY		Lab I.D.	Sample I.D.	Sample Depth (feet)	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						PRESERV.	DATE	TIME																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							
							GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :				ACID/BASE:	ICE / COOL	OTHER :																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
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PLEASE NOTE: Liability and Damages. Cardinal's liability and clients exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By: <i>Colleen</i>	Date: 10/17/22	Received By: <i>twor</i>	Verbal Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
---------------------------------	----------------	--------------------------	---	----------------

Relinquished By: <i>Colleen</i>	Date: 10/18-22	Received By: <i>twor</i>	All Results are emailed. Please provide Email address: <i>hgreene@ensolum.com</i>
---------------------------------	----------------	--------------------------	---

Delivered By: (Circle One) <i>DMO</i>	Observed Temp. °C: 5.4	Sample Condition: <input checked="" type="checkbox"/> Cool <input type="checkbox"/> Intact	CHECKED BY: (Initials) <i>twor</i>
---------------------------------------	------------------------	--	------------------------------------

Sampler - UPS - Bus - Other: <i>DMO</i>	Corrected Temp. °C: 4.8	Turnaround Time: <i>10/18/22</i>	Standard: <input checked="" type="checkbox"/> <i>Rush</i>	Bacteria (only) Sample Condition: <input type="checkbox"/> Cool <input type="checkbox"/> Intact
---	-------------------------	----------------------------------	---	---

Thermometer ID #113	Correction Factor: -0.6°C	Temperature: 10/18/22	Yes <input type="checkbox"/> No <input type="checkbox"/>	Observed Temp. °C
---------------------	---------------------------	-----------------------	--	-------------------

Corrected Temp. °C	Yes <input type="checkbox"/> No <input type="checkbox"/>	Corrected Temp. °C	Yes <input type="checkbox"/> No <input type="checkbox"/>
--------------------	--	--------------------	--

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



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

December 22, 2022

HADLIE GREEN

ENSOLUM

3122 NATIONAL PARKS HWY

CARLSBAD, NM 88220

RE: ROJO 22-25 TANK BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 12/19/22 14:19.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

ENSOLUM
HADLIE GREEN
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220
Fax To:

Received: 12/19/2022
Reported: 12/22/2022
Project Name: ROJO 22-25 TANK BATTERY
Project Number: 03C2012008
Project Location: BTA - 32.11186, -103.96366

Sampling Date: 12/15/2022
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Shalyn Rodriguez

Sample ID: FS 01 @ 1' (H225989-01)

BTEX 8021B		mg/kg		Analyzed By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/21/2022	ND	2.09	104	2.00	1.57	
Toluene*	<0.050	0.050	12/21/2022	ND	2.17	108	2.00	0.717	
Ethylbenzene*	<0.050	0.050	12/21/2022	ND	2.09	105	2.00	2.16	
Total Xylenes*	<0.150	0.150	12/21/2022	ND	6.50	108	6.00	0.518	
Total BTEX	<0.300	0.300	12/21/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 105 % 69.9-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	896	16.0	12/21/2022	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	12/21/2022	ND	208	104	200	10.7	
DRO >C10-C28*	<10.0	10.0	12/21/2022	ND	221	111	200	10.5	
EXT DRO >C28-C36	<10.0	10.0	12/21/2022	ND					

Surrogate: 1-Chlorooctane 68.0 % 45.3-161

Surrogate: 1-Chlorooctadecane 75.7 % 46.3-178

Cardinal Laboratories

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

ENSOLUM
HADLIE GREEN
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220
Fax To:

Received: 12/19/2022
Reported: 12/22/2022
Project Name: ROJO 22-25 TANK BATTERY
Project Number: 03C2012008
Project Location: BTA - 32.11186, -103.96366

Sampling Date: 12/15/2022
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Shalyn Rodriguez

Sample ID: FS 02 @ 1' (H225989-02)

BTEx 8021B		mg/kg		Analyzed By: JH/						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	12/21/2022	ND	2.09	104	2.00	1.57		
Toluene*	<0.050	0.050	12/21/2022	ND	2.17	108	2.00	0.717		
Ethylbenzene*	<0.050	0.050	12/21/2022	ND	2.09	105	2.00	2.16		
Total Xylenes*	<0.150	0.150	12/21/2022	ND	6.50	108	6.00	0.518		
Total BTEx	<0.300	0.300	12/21/2022	ND						

Surrogate: 4-Bromofluorobenzene (PID) 106 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	12/21/2022	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	12/21/2022	ND	208	104	200	10.7	
DRO >C10-C28*	<10.0	10.0	12/21/2022	ND	221	111	200	10.5	
EXT DRO >C28-C36	<10.0	10.0	12/21/2022	ND					

Surrogate: 1-Chlorooctane 87.8 % 45.3-161

Surrogate: 1-Chlorooctadecane 95.9 % 46.3-178

Cardinal Laboratories

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

ENSOLUM
HADLIE GREEN
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220
Fax To:

Received: 12/19/2022
Reported: 12/22/2022
Project Name: ROJO 22-25 TANK BATTERY
Project Number: 03C2012008
Project Location: BTA - 32.11186, -103.96366

Sampling Date: 12/15/2022
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Shalyn Rodriguez

Sample ID: SW 01 @ 0'-1' (H225989-03)

BTX 8021B		mg/kg		Analyzed By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/21/2022	ND	2.09	104	2.00	1.57	
Toluene*	<0.050	0.050	12/21/2022	ND	2.17	108	2.00	0.717	
Ethylbenzene*	<0.050	0.050	12/21/2022	ND	2.09	105	2.00	2.16	
Total Xylenes*	<0.150	0.150	12/21/2022	ND	6.50	108	6.00	0.518	
Total BTX	<0.300	0.300	12/21/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 107 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	80.0	16.0	12/21/2022	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	12/20/2022	ND	222	111	200	1.68	
DRO >C10-C28*	<10.0	10.0	12/20/2022	ND	195	97.3	200	5.06	
EXT DRO >C28-C36	<10.0	10.0	12/20/2022	ND					

Surrogate: 1-Chlorooctane 95.2 % 45.3-161

Surrogate: 1-Chlorooctadecane 95.8 % 46.3-178

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Celey D. Keene, Lab Director/Quality Manager



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

Notes and Definitions

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

Cardinal Laboratories

*=Accredited Analyte

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

Celey D. Keene, Lab Director/Quality Manager



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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]



APPENDIX D

Final C-141s

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	nAPP2206753386
District RP	
Facility ID	fAPP2130123342
Application ID	

Release Notification

Responsible Party

Responsible Party: BTA Oil Producers, LLC	OGRID: 260297
Contact Name: Bob Hall	Contact Telephone: 432-682-3753
Contact email: bhall@btaoil.com	Incident # (assigned by OCD) nAPP2206753386
Contact mailing address: 104 S. Pecos St., Midland, TX 79701	

Location of Release Source

Latitude: 32.11186 Longitude: -103.56366

(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Rojo 22-25 Tank Battery	Site Type: Production Equipment at Tank Battery
Date Release Discovered: 3/7/2022	API# (if applicable) Nearest well:

Unit Letter	Section	Township	Range	County
N	22	25S	33E	Lea

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

Nature and Volume of Release

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

<input checked="" type="checkbox"/> Crude Oil	Volume Released (bbls) 5 BBL	Volume Recovered (bbls) 4 BBL
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 7 BBL	Volume Recovered (bbls) 6 BBL
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

Dump Valve Failure.

Fluid cut a hole in the body of the water dump on the Rojo 31H separator. Release of oil/water mix under the vessel and onto the surrounding caliche pad and road. Fluid soaked where it sprayed toward the ground near the dump valve. Cold weather prevented fluid from soaking as it spread. Recovered 4 BO + 6 BW.

Form C-141

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State of New Mexico
Oil Conservation Division

Incident ID	nAPP2206753386
District RP	
Facility ID	fAPP2130123342
Application ID	

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

Initial Response

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

<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:
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: Bob Hall Title: Environmental Manager
Signature: <u></u> Date: 3/8/2022
email: bhall@btaoil.com Telephone: 432-682-3753
<u>OCD Only</u>
Received by: <u>Jocelyn Harimon</u> Date: <u>03/11/2022</u>

Location Rojo 31 Water Dump Cut Out**API #****Spill Date** 3/7/2022**Spill Dimensions****ENTER** - Length of Spill feet**ENTER** - Width of Spill feet**ENTER** - Saturation Depth of Spill inches**ENTER** - Porosity Factor decimal**Oil Cut - Well Test / Vessel Throughput or Contents**

Oil

Water

Calculated Oil Cut

Volume Recovered in Truck / Containment**ENTER** - Recovered Oil BBL**ENTER** - Recovered Water BBL**Calculated Values**

Release of Oil in Soil - Unrecovered

calculated
 BBL

Release of Water in Soil - Unrecovered

 BBL

Unrecovered Total Release

 BBL**Calculated Values**

Total Release of Oil

calculated
 BBL

Total Release of Water

 BBL

Total Release

 BBL

Types of Soil	Porosity Factor
Gravel	0.25
Sand	0.20
Clay/silt/sand Mix	0.15
Clay	0.05
Caliche	0.03
Unknown	0.25

(Length X Width X Depth X 1 ft/12 in) X Porosity5.615 ft³ / BBL

X

Oil Cut
(or Water Cut)

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 88326

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 88326
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
jharimon	None	3/11/2022

Incident ID	nAPP2206753386
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>51-100</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.

Form C-141

State of New Mexico
Oil Conservation Division

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Incident ID	nAPP2206753386
District RP	
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: Bob HallTitle: Environmental ManagerSignature: B. HallDate: 2/16/2023email: bhall@btaoil.comTelephone: 432-682-3753**OCD Only**Received by: Jocelyn HarimonDate: 02/16/2023

Form C-141

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State of New Mexico
Oil Conservation Division

Incident ID	nAPP2206753386
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: Bob Hall Title: Environmental Manager
Signature: B. Hall Date: 2/16/2023
email: bhall@btaoil.com Telephone: 432-682-3753

OCD Only

Received by: Jocelyn Harimon Date: 02/16/2023

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: Jennifer Nobui Date: 02/28/2023
Printed Name: Jennifer Nobui Title: Environmental Specialist A

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	nAPP2209076202
District RP	
Facility ID	fAPP2130123342
Application ID	

Release Notification

Responsible Party

Responsible Party: BTA Oil Producers, LLC	OGRID: 260297
Contact Name: Bob Hall	Contact Telephone: 432-682-3753
Contact email: bhall@btaoil.com	Incident # (assigned by OCD) nAPP2209076202
Contact mailing address: 104 S. Pecos St., Midland, TX 79701	

Location of Release Source

Latitude: 32.11186 Longitude: -103.56366

(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Rojo 22-25 Tank Battery	Site Type: Production Equipment at Tank Battery
Date Release Discovered: 3/17/2022	API# (if applicable) Nearest well:

Unit Letter	Section	Township	Range	County
N	22	25S	33E	Lea

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

Nature and Volume of Release

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

<input checked="" type="checkbox"/> Crude Oil	Volume Released (bbls) 10 BBL	Volume Recovered (bbls) 3 BBL
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	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

Valve Failure.

A leak from a failed gasket of a ball valve on the oil dump line of the Rojo 22 Fed Com 30H separator released an estimated 10 BO. Recovered 3 BO with vacuum truck, the remainder soaked into the sand under the vessel. The spill volume is based on the estimated volume of the drained oil-side of the separator as a rectangular container rather than as a portion of a horizontal cylinder. $(6' \times 15' \times 0.6') / 5.615 = 10 \text{ BBL}$

State of New Mexico
Oil Conservation Division

Incident ID	nAPP2209076202
District RP	
Facility ID	fAPP2130123342
Application ID	

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

Initial Response

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

<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:
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: Bob Hall Title: Environmental Manager Signature: _____/s/ Bob Hall Date: 3/31/2022 email: bhall@btaoil.com Telephone: 432-682-3753
OCD Only Received by: <u>Jocelyn Harimon</u> Date: <u>04/01/2022</u>

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 95124

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 95124
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
jharimon	None	4/1/2022

Incident ID	nAPP2209076202
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>51-100</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.

Form C-141

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State of New Mexico
Oil Conservation Division

Incident ID	nAPP2209076202
District RP	
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: Bob HallTitle: Environmental ManagerSignature: Date: 2/16/2023email: bhall@btaoil.comTelephone: 432-682-3753**OCD Only**

Received by: _____

Date: _____

Form C-141

Page 6

State of New Mexico
Oil Conservation Division

Incident ID	nAPP2209076202
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: Bob HallTitle: Environmental ManagerSignature: B. HallDate: 2/16/2023email: bhall@btaoil.comTelephone: 432-682-3753**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: _____

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 186995

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 186995
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
jnobui	Closure Report Approved. Please implement 19.15.29.13 NMAC when completing P&A.	2/28/2023