ENSOLUM

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.

SITE CHARACTERIZATION AND CLOSURE CRITERIA

The Site was characterized to assess the applicablity 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 personel 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

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 appeeared 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.

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

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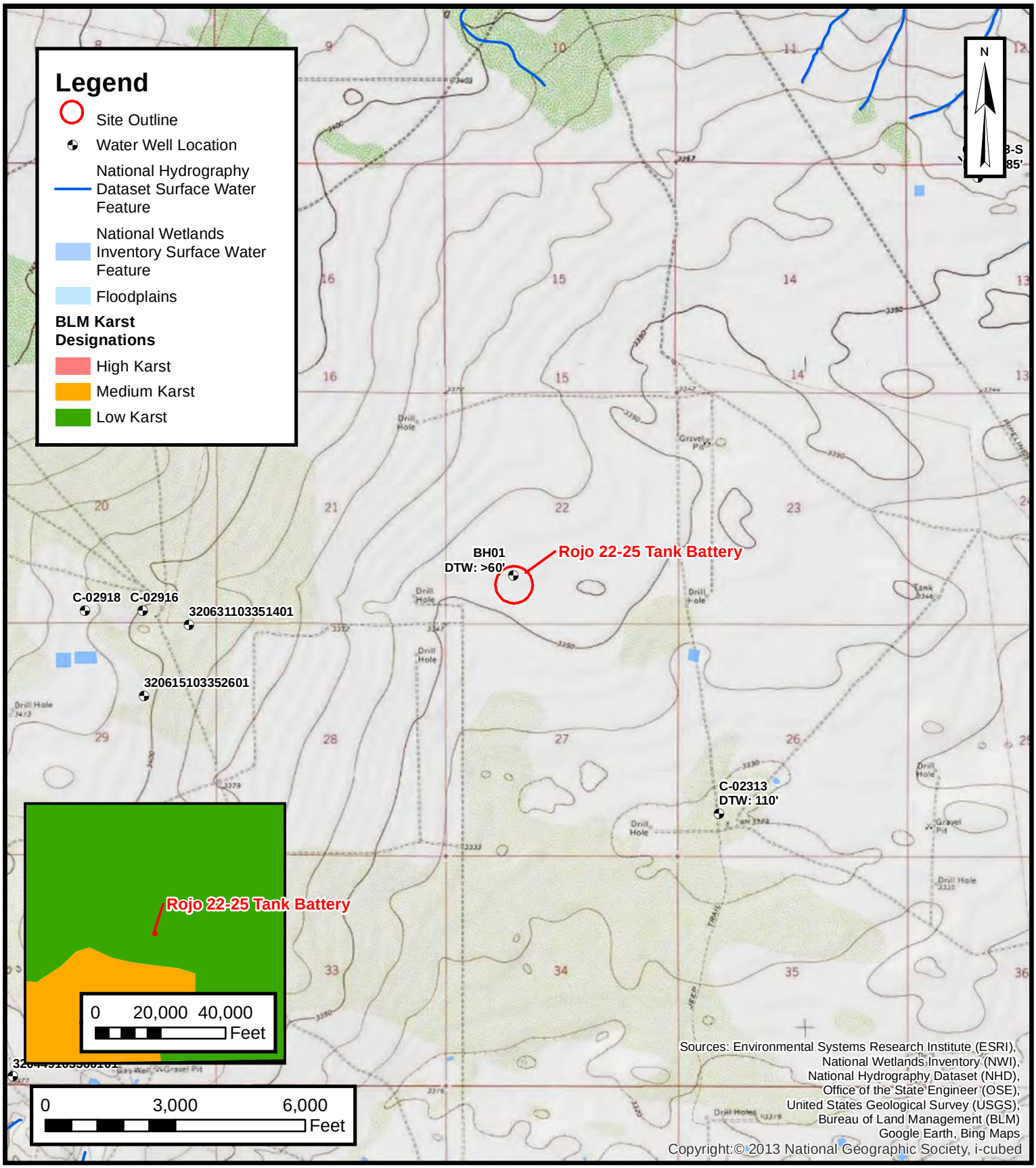
FIGURES



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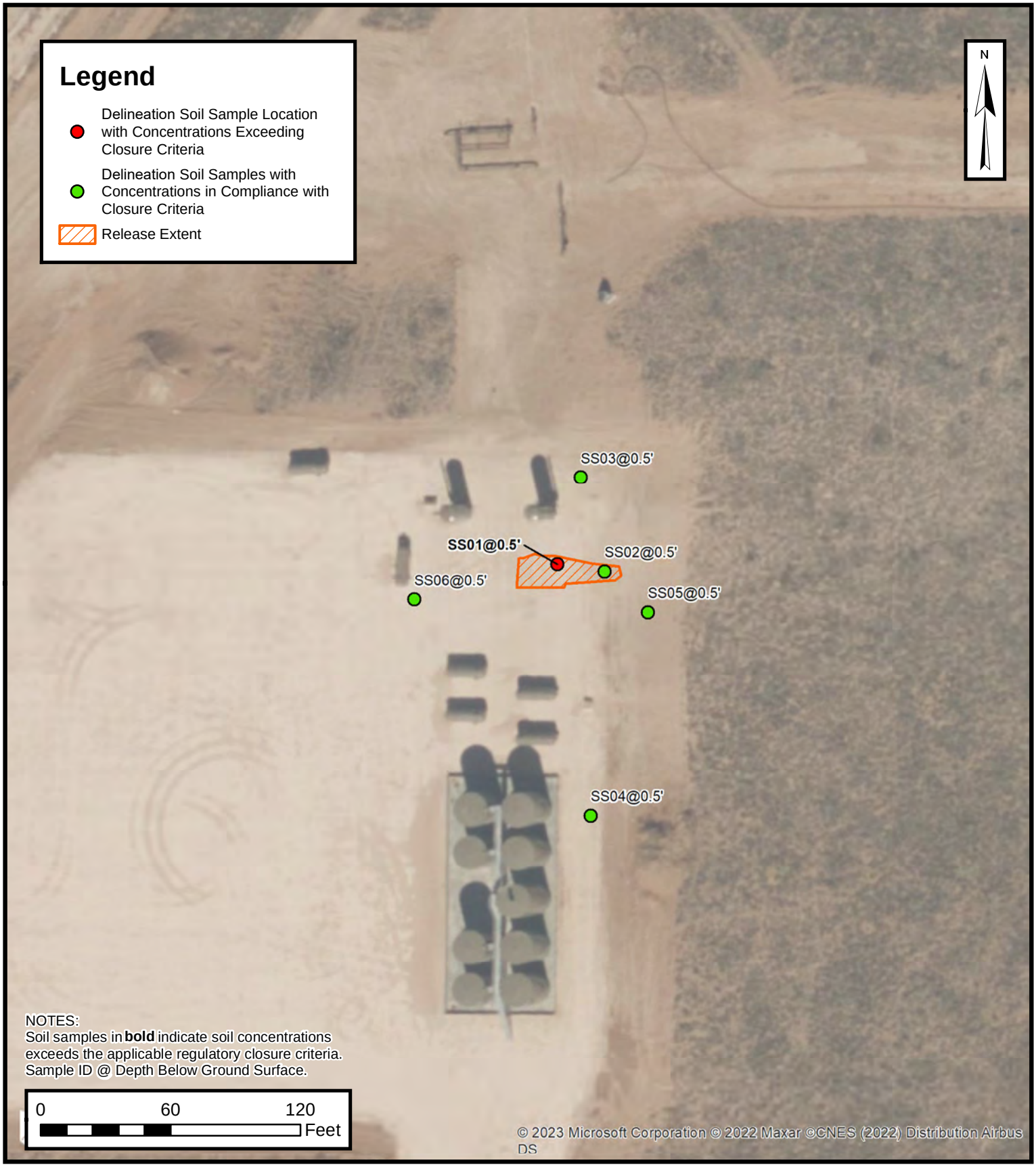
Environmental, Engineering and Hydrogeologic Consultants

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



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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

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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

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TABLES

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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

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APPENDIX A

Referenced Well Records

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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

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APPENDIX B

Photographic Log

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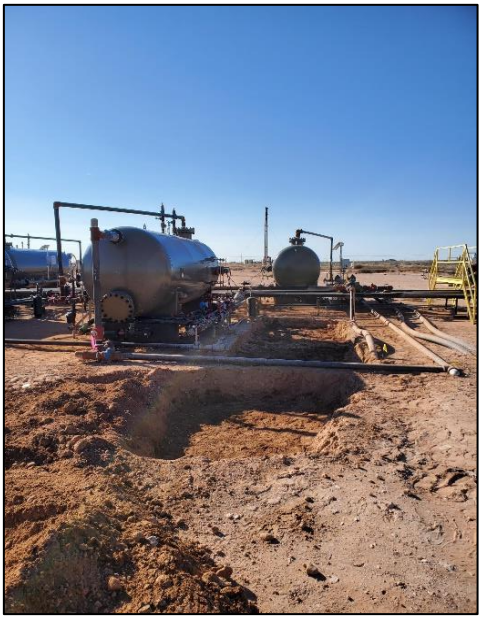
Photographic Log
BTA Oil Producers, LLC
Rojo 22-25 Tank Battery
Incident Numbers nAPP2206753386 & nAPP2209076202

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 activites
View: Southeast

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APPENDIX C

Laboratory Analytical Reports & Chain of Custody Documentation

CARDINAL Laboratories

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 accreditated 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,

Celey D. Keene

Celey D. Keene

Lab Director/Quality Manager

CARDINAL Laboratories

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

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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: 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

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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: 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

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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: 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, 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 *96.3 %* *45.3-161*

Surrogate: 1-Chlorooctadecane *103 %* *46.3-178*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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: 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, 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 *92.2 %* *45.3-161*

Surrogate: 1-Chlorooctadecane *99.4 %* *46.3-178*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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: 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, 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 *95.6 %* *45.3-161*

Surrogate: 1-Chlorooctadecane *104 %* *46.3-178*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

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

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name:	Ensolum, LLC
Project Manager:	Hadlie Green
Address:	601 N. Marienfeld St. STE 400
City:	Midland State: TX Zip: 79701
Phone #:	505 798 2608 432-557-8895 Fax #:
Project #:	03C2012008 Project Owner: BTA
Project Name:	Rojo 22-25 Tank Battery
Project Location:	
Sampler Name:	Conner Wharton

BILL TO

P.O. #:	
Company:	BTA Oil
Attn:	Bob Hall
Address:	104 S Pecos St.
City:	Midland
State:	TX Zip: 79701
Phone #:	432-312-2203
Fax #:	

ANALYSIS REQUEST

FOR LAB USE ONLY Lab I.D.	Sample I.D.	Sample Depth (feet)	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX: GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	PRESERV.: ACID/BASE:	ICE / COOL	OTHER :	SAMPLING: DATE	TIME	Chloride	BTEX	TPH
H224889																		
1	SS01	.5	G	1			✓					✓		10/17/22	1235	✓	✓	✓
2	SS02	.5	G	1			✓					✓		10/17/22	1240	✓	✓	✓
3	SS03	.5	G	1			✓					✓		10/17/22	1250	✓	✓	✓
4	SS04	.5	G	1			✓					✓		10/17/22	1255	✓	✓	✓
5	SS05	.5	G	1			✓					✓		10/17/22	1300	✓	✓	✓
6	SS06	.5	G	1			✓					✓		10/17/22	1305	✓	✓	✓

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 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 consequental 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:	Date: 10/17/22 Time: 1600	Received By:	Verbal Result: ☐ Yes ☐ No Add'l Phone #:
Relinquished By:	Date: 10-18-22 Time: 1433	Received By:	All Results are emailed. Please provide Email address: BJennings@ensolum.com hgreen@ensolum.com
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	Observed Temp. °C 5.4 Corrected Temp. °C 4.8	Sample Condition: Cool ☑ Yes ☐ No; Intact ☑ Yes ☐ No	CHECKED BY: (Initials) TE

REMARKS:

Turnaround Time: Standard ☑ Rush ☐

Thermometer ID #113 Correction Factor -0.6°C TE. 10/18/22

Bacteria (only) Sample Condition: Cool ☐ Yes ☐ No; Intact ☐ Yes ☐ No; Observed Temp. °C; Corrected Temp. °C

FORM-006 R 3.2 10/07/21

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

CARDINAL Laboratories

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 accreditated 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,

Celey D. Keene

Celey D. Keene

Lab Director/Quality Manager

CARDINAL Laboratories

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	Sampling Date:	12/15/2022
Reported:	12/22/2022	Sampling Type:	Soil
Project Name:	ROJO 22-25 TANK BATTERY	Sampling Condition:	Cool & Intact
Project Number:	03C2012008	Sample Received By:	Shalyn Rodriguez
Project Location:	BTA - 32.11186, -103.96366		

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 *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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	Sampling Date:	12/15/2022
Reported:	12/22/2022	Sampling Type:	Soil
Project Name:	ROJO 22-25 TANK BATTERY	Sampling Condition:	Cool & Intact
Project Number:	03C2012008	Sample Received By:	Shalyn Rodriguez
Project Location:	BTA - 32.11186, -103.96366		

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, SM4500Cl-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 *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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	Sampling Date:	12/15/2022
Reported:	12/22/2022	Sampling Type:	Soil
Project Name:	ROJO 22-25 TANK BATTERY	Sampling Condition:	Cool & Intact
Project Number:	03C2012008	Sample Received By:	Shalyn Rodriguez
Project Location:	BTA - 32.11186, -103.96366		

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

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	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 *107 %* *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	**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*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name:	Ensolum, LLC
Project Manager:	Hadlie Green
Address:	3122 National Parks Hwy
City:	Carlsbad State: NM Zip: 88220
Phone #:	432-557-8895 Fax #:
Project #:	03C2012008 Project Owner:
Project Name:	Rojo 22-25 Tank Battery
Project Location:	32.11186, -103.56366
Sampler Name:	Peter Van Patten

BILL TO

P.O. #:	
Company:	BTA
Attn:	Bob Hall
Address:	104 S Pecos St
City:	Midland
State:	TX Zip: 79701
Phone #:	432-312-2203
Fax #:	

FOR LAB USE ONLY

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX: GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	PRESERV.: ACID/BASE:	ICE / COOL	OTHER:	SAMPLING: DATE	TIME	ANALYSIS REQUEST: Chloride	BTEX	TPH
H225989																	
1	FS01 @ 1'	C	1			✓					✓		12-15	1245	✓	✓	✓
2	FS02 @ 1'	C	1			✓					✓		12-15	1315	✓	✓	✓
3	SW01 @ 0'-1'	C	1			✓					✓		12-15	1320	✓	✓	✓

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 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 consequental 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: Peter Van Patten	Date: 12-19-22 Time: 1419	Received By: S Rodriguez	Verbal Result: ☐ Yes ☑ No Add'l Phone #:
Relinquished By:	Date: Time:	Received By:	All Results are emailed. Please provide Email address: hgreen@ensolum.com, tmorrissey@ensolum.com
			REMARKS:

Delivered By: (Circle One) Sampler - UPS - Bus - Other:	Observed Temp. °C 2.9 Corrected Temp. °C 2.3	Sample Condition: Cool ☑ Yes ☐ No; Intact ☐ Yes ☐ No	CHECKED BY: (Initials) SR	Turnaround Time: Standard ☑ Rush ☐ Thermometer ID #113 Correction Factor -0.5°C

Bacteria (only) Sample Condition: Cool ☐ Yes ☐ No; Intact ☐ Yes ☐ No; Observed Temp. °C; Corrected Temp. °C

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

FORM-006 R 3.2 10/07/21

ENSOLUM

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)

☒ Crude Oil	Volume Released (bbls) 5 BBL	Volume Recovered (bbls) 4 BBL
☒ 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?	☒ Yes ☐ No
☐ Condensate	Volume Released (bbls)	Volume Recovered (bbls)
☐ Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
☐ 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
Page 2

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? ☐ Yes ☒ No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

Initial Response

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

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

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

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

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

Printed Name: Bob Hall Title: Environmental Manager

Signature: Bob Hall Date: 3/8/2022

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

OCD Only

Received by: Jocelyn Harimon Date: 03/11/2022

Location Rojo 31 Water Dump Cut Out
API #
Spill Date 3/7/2022

Spill Dimensions

ENTER - Length of Spill	29	**feet**
ENTER - Width of Spill	29	**feet**
ENTER - Saturation Depth of Spill	6	**inches**
ENTER - Porosity Factor	0.03	**decimal**

Oil Cut - Well Test / Vessel Throughput or Contents

Oil	40
Water	60
Calculated Oil Cut	0.4

Volume Recovered in Truck / Containment

ENTER - Recovered Oil	4	**BBL**
ENTER - Recovered Water	6	**BBL**

	calculated	
Calculated Values		
Release of Oil in Soil - Unrecovered	1	***BBL***
Release of Water in Soil - Unrecovered	1	***BBL***
Unrecovered Total Release	2	***BBL***

	calculated	
Calculated Values		
Total Release of Oil	5	***BBL***
Total Release of Water	7	***BBL***
Total Release	12	***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 Porosity
5.615 ft^3 / 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

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

State of New Mexico
Oil Conservation Division

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?	51-100 (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ☒ No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☒ No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ☒ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☒ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☒ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☒ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☒ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☒ No
Did the release impact areas **not** on an exploration, development, production, or storage site?	☐ Yes ☒ No

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

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

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

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

Form C-141
Page 4

State of New Mexico
Oil Conservation Division

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 Hall Title: Environmental Manager

Signature: Bob Hall Date: 2/16/2023

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

OCD Only

Received by: Date:

Form C-141
Page 6

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: BHall Date: 2/16/2023

email: bhall@btaoil.com Telephone: 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
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)

☒ Crude Oil	Volume Released (bbls) 10 BBL	Volume Recovered (bbls) 3 BBL
☐ Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	☐ Yes ☐ No
☐ Condensate	Volume Released (bbls)	Volume Recovered (bbls)
☐ Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
☐ 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' x 15' x 0.6') / 5.615 = 10 BBL

Form C-141
Page 2

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? ☐ Yes ☒ No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

Initial Response

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

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

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

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

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

Printed Name: 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: Jocelyn Harimon Date: 04/01/2022

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
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District IV
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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

State of New Mexico
Oil Conservation Division

Incident ID	nAPP2209076202
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

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Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☒ No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ☒ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☒ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☒ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☒ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☒ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☒ No
Did the release impact areas **not** on an exploration, development, production, or storage site?	☐ Yes ☒ No

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

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

☒ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
☒ Field data
☒ Data table of soil contaminant concentration data
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☒ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
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☒ Photographs including date and GIS information
☒ Topographic/Aerial maps
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Page 4

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 Hall Title: Environmental Manager

Signature: Bob Hall Date: 2/16/2023

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

OCD Only

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

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 Hall Title: Environmental Manager

Signature: Bob 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
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
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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 186990

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 186990
	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