



November 15, 2023

New Mexico Oil Conservation Division

New Mexico Energy, Minerals, and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**Re: Revised Deferral Request
Ogden Dump Valve Release
Incident Number nAPP2216725109
Eddy County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of BTA Oil Producers, LLC (BTA), has prepared this *Revised Deferral Request* to document the considerable amount of active production equipment within the lined containment berm at the Ogden Dump Valve Release (Site), in response to the New Mexico Oil Conservation Division (NMOCD) denial of the original *Deferral Request*, submitted on September 15, 2022.

On December 13, 2022, the NMOCD denied the original *Deferral Request* for the following reason:

Request for deferral is denied. Only sample points that require a major facility deconstruction will be deferred. In the photographs provided it appears that the area where the release breached the liner is free of equipment and would allow further delineation of the impacts of the release. Please resubmit a closure report with all the required documentation and completed C-141 forms within 90 days or by 03/13/2023.

Based on follow-up correspondence with NMOCD regarding the denial and additional photographs documenting the active production equipment in the deferral area, BTA is submitting this *Revised Deferral Request*, requesting deferral of final remediation for Incident Number nAPP2216725109 until the Site is reconstructed, and/or the well pad is abandoned. The NMOCD correspondence is included in Appendix A and an updated photographic log is included in Appendix B.

Details regarding the release, Site characterization, and delineation activities can be referenced in the original September 15, 2022, *Deferral Request*, which is included as Appendix C.

ADDITIONAL SITE DOCUMENTATION

On October 6, 2023, Ensolum personnel returned to the Site to collect additional photographic documentation of the active production equipment with lined containment. The photographs show the considerable amount of active production and pipelines within the deferral request area and provide additional documentation that remediation within the lined containment would require a major facility deconstruction.

BTA Oil Producers, LLC
Revised Deferral Request
Ogden Dump Valve Release

Page 2

DEFERRAL REQUEST

BTA is requesting deferral of final remediation due to the presence of active production equipment and surface pipelines within the lined containment. The impacted soil is limited to the area immediately beneath the lined containment and active production equipment, where remediation would require a major facility deconstruction.

The impacted soil remaining in place beneath the liner is delineated vertically by delineation soil samples BH01A and BH01B collected at 3 feet and 4 feet bgs and laterally by delineation soil samples SS01 through SS04. A maximum of 1,250 cubic yards of TPH and chloride impacted soil remains in place beneath the liner assuming a maximum 3-foot depth based on the delineation soil samples listed above, that were compliant with the Closure Criteria.

BTA does not believe deferment will result in imminent risk to human health, the environment, or groundwater. Depth to groundwater was determined to be between 51 feet bgs and 100 feet bgs, the release was contained laterally by the lined containment, and the impacted soil remaining in place is limited to the area immediately beneath the liner. The liner has been repaired by BTA which will restrict future vertical migration of residual impacts.

Based on the presence of active production equipment within the release area and the complete lateral and vertical delineation of impacted soil remaining in place, BTA requests deferral of final remediation for Incident Number NAPP2216725109 until final reclamation of the well pad or major construction, whichever comes first.

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
Project Geologist



Aimee Cole
Senior Managing Scientist

cc: Kelton Beaird, BTA
New Mexico State Land Office

Appendices:

Appendix A NMOCD Correspondence
Appendix B Photographic Log
Appendix C Deferral Request, September 15, 2022
Appendix D Form C-141



APPENDIX A

NMOCD Correspondence

From: [Harimon, Jocelyn, EMNRD](#)
To: [Tacoma Morrissey](#); [Enviro, OCD, EMNRD](#)
Cc: [Kelton Beaird](#); [Nathan Sirgo](#); [Hadlie Green](#)
Subject: RE: [EXTERNAL] RE: BTA- Ogden Dump Valve Release- Incident Number NAPP2216725109
Date: Wednesday, July 19, 2023 4:13:36 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

[**EXTERNAL EMAIL**]

Good afternoon Tacoma,

Please submit this revised deferral request through the OCD permitting portal for review.

Jocelyn Harimon

Jocelyn Harimon • Environmental Specialist
Environmental Bureau
EMNRD - Oil Conservation Division
1220 South St. Francis Drive | Santa Fe, NM 87505
(505)469-2821 | Jocelyn.Harimon@emnrd.nm.gov
[http:// www.emnrd.nm.gov](http://www.emnrd.nm.gov)



From: Tacoma Morrissey <tmorrissey@ensolum.com>
Sent: Wednesday, July 19, 2023 3:06 PM
To: Harimon, Jocelyn, EMNRD <Jocelyn.Harimon@emnrd.nm.gov>; Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>
Cc: Kelton Beaird <KBeaird@btaoil.com>; Nathan Sirgo <nsirgo@btaoil.com>; Hadlie Green <hgreen@ensolum.com>
Subject: [EXTERNAL] RE: BTA- Ogden Dump Valve Release- Incident Number NAPP2216725109

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Hi Jocelyn,

Please see the response below, per our discussion.

Thanks,

|

**Tacoma Morrissey**

Senior Geologist

337-257-8307

Ensolum, LLC

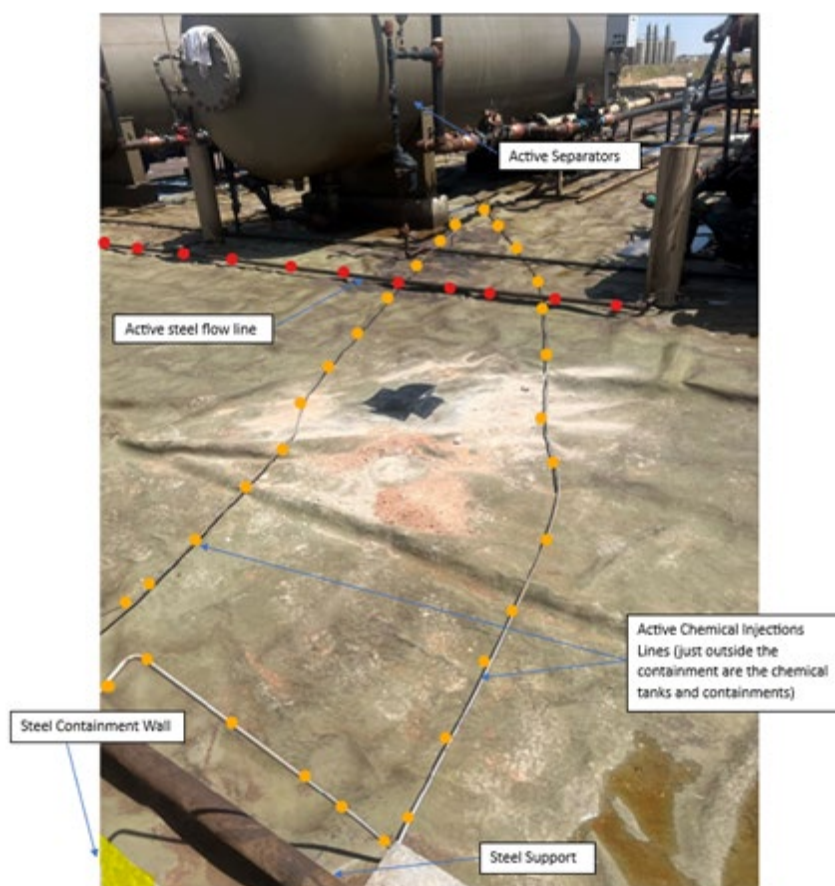
in f 

From: Tacoma Morrissey**Sent:** Friday, May 26, 2023 9:30 AM**To:** Harimon, Jocelyn, EMNRD <Jocelyn.Harimon@emnrd.nm.gov>; ocd.enviro (<ocd.enviro@emnrd.nm.gov>) <ocd.enviro@emnrd.nm.gov>**Cc:** Kelton Beard <KBeard@btaoil.com>; Nathan Sirgo <nsirgo@btaoil.com>; Hadlie Green <hgreen@ensolum.com>**Subject:** BTA- Ogden Dump Valve Release- Incident Number NAPP2216725109

Dear Ms. Harimon,

We appreciate your review and response to the subject Deferral Request. Following a review of the comments listed on the OCD Portal we would like to provide the following clarifications and request that you reconsider approval of the deferral request.

- *Request for deferral is denied. Only sample points that require a major facility deconstruction will be deferred.*
 - BTA recognizes deferral can only be granted for samples located near active production equipment. While it appears there is space within the lined containment there is not room to safely complete excavation of impacted soil without shutting down active equipment or possibly removing equipment, lines, or containment walls, and destroying the liner.
- *In the photographs provided it appears that the area where the release breached the liner is free of equipment and would allow for further delineation of the impacts of the release.*
 - The area is not free of equipment, please see the photo, included in the photolog in the report, below marked with the active equipment and noting the proximity of the steel containment wall. In addition, a second photo below shows equipment just outside this location, which would have to be shut down and possibly removed in order to reach the location of the impacted soil. Note that the second photo was taken just prior to completing the delineation, the black x marks the approximate location of BH01.
 - Further delineation is not required, the sample analytical results provide vertical delineation to the Closure Criteria and horizontal delineation samples collected around the tank containment confirm the release did not exit the containment sides. The liner, now repaired, will prevent migration of impacts to deeper soils and the impacted soil will be removed during any major facility reconstruction or pad abandonment.
- *Please resubmit a closure report with all the required documentation and completed C-141 forms.*
 - Based on the clarifications provided above and the additional photos provided below, BTA request reconsideration of approval for the deferral request, submitted as is.





On behalf of BTA, we appreciate your time and respectfully requests you reconsider and grant approval of the Deferral Request.

Thanks,



Tacoma Morrissey

Senior Geologist

337-257-8307

Ensolum, LLC

in f 

From: [Tacoma Morrissey](#)
To: [Enviro, OCD, EMNRD](#)
Cc: [Bob Hall](#)
Subject: BTA - 48 Hour Liner Inspection- OGDEN DUMP VALVE RELEASE / NAPP2216725109
Date: Tuesday, June 21, 2022 9:08:00 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good afternoon,

This is sent as a 48-hour notification, BTA is scheduled to inspect the lined containment at Ogden Dump Valve Release (Incident Number NAPP2216725109) on Thursday, June 23, 2022, at 9 am MST for a release that occurred at the facility (Facility ID fAB1904636949) on Wednesday, June 15, 2022. A 24-hour release notification was sent Thursday, June 16, 2022 because the release was greater than 25 barrels in volume. Please call us with any questions or concerns.

GPS Coordinates: (32.26208,-104.117478)

Thank you,



Tacoma Morrissey

Senior Geologist

337-257-8307

Ensolum, LLC

in f 



APPENDIX B

Photographic Log

**Photographic Log**

BTA Oil Producers, LLC
Ogden Dump Valve Release
Incident Number NAPP2212458439



Photograph 1 Date: October 6, 2023
Description: Patched liner at BH01 location, facing southwest



Photograph 2 Date: October 6, 2023
Description: Patched liner at BH01 location, facing west



Photograph 3 Date: October 6, 2023
Description: Patched liner at BH01 location, facing southeast



Photograph 4 Date: October 30, 2023
Description: Active equipment inside of lined containment, facing northwest



APPENDIX C

Deferral Request, September 15, 2022



August 18, 2022

District II
New Mexico Oil Conservation Division
811 South First Street
Artesia, New Mexico 88210

**Re: Deferral Request
Ogden Dump Valve Release
Incident Number NAPP2216725109
Eddy County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of BTA Oil Producers, LLC (BTA), has prepared this Deferral Request to document site assessment and soil sampling activities at the Ogden Dump Valve Release (Site). The purpose of the site assessment and soil sampling activities was to assess for the presence or absence of impacts to soil following a release of produced water and crude oil within lined containment at the Site. Based on field observations, field screening activities, and soil sample laboratory analytical results, BTA is submitting this Deferral Request, describing site assessment and delineation activities that have occurred and requesting deferral of final remediation for Incident Number NAPP2216725109 until the Site is reconstructed, and/or the well pad is abandoned.

SITE DESCRIPTION AND RELEASE SUMMARY

The Site is located in Unit E, Section 32, Township 23 South, Range 28 East, in Eddy County, New Mexico (32.261866° N, 104.117304°W) and is associated with oil and gas exploration and production operations on New Mexico State Land.

On June 15, 2022, a dump valve malfunctioned, resulting in the release of approximately 72 barrels (bbls) of produced water and 6 bbls of crude oil into the lined tank battery containment. A vacuum truck was immediately dispatched to the Site to recover free-standing fluids; 70 bbls of released produced water and 5 bbls of crude oil were recovered from within the lined containment. BTA reported the release to the New Mexico Oil Conservation Division (NMOCD) via email on June 16, 2022 and submitted a Release Notification Form C-141 (Form C-141) on June 16, 2022. The release was assigned Incident Number NAPP2216725109.

SITE CHARACTERIZATION AND CLOSURE CRITERIA

The Site was characterized according to Table 1, Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29, Section 12 (19.15.29.12) 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 between 50 feet to 100 feet below ground surface (bgs) based on the nearest groundwater well data. The closest permitted groundwater well with depth to groundwater data is United States Geological Survey (USGS) well 321552104071601, located approximately 0.3 miles northwest of the Site. The groundwater well has a reported depth to groundwater of 57 feet bgs and a total depth of 93 feet bgs. Ground surface elevation at the groundwater well location is 3,138 feet above mean sea level (amsl), which is approximately 25 feet higher in elevation than the Site. All wells used for depth to groundwater determination are presented on Figure 1. The referenced well records are included in Appendix A.

The closest continuously flowing or significant watercourse to the Site is a dry wash, located approximately 2,240 feet southeast 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 underlain by unstable geology (high potential karst designation area). Site receptors are identified on Figure 1.

Based on the results of the Site Characterization, the following NMOCD Table 1 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): 100 mg/kg
- Chloride: 600 mg/kg

SITE ASSESSMENT ACTIVITIES

A 48-hour advance notice of liner inspection was provided via email on June 21, 2022, to the NMOCD District II office. A liner integrity inspection was conducted by Ensolum personnel on June 23, 2022. Upon inspection, the liner was determined to be insufficient. On June 24, 2022 and July 19, 2022, Ensolum personnel visited the Site to evaluate the release extent and conduct site assessment activities. One borehole (BH01) was advanced via hand auger near the location of the tear in the liner to assess the vertical extent of impacted soil. Three discrete delineation soil samples were collected from the borehole (BH01/BH01A/BH01B) at depths ranging from 0.5 feet to 4 feet bgs. Additionally, four delineation soil samples SS01 through SS04 were collected around the lined containment at 0.5 feet bgs to confirm the lateral extent of the release. Soil from the borehole and lateral delineation soil samples was field screened for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID) and chloride using Hach® chloride QuanTab® test strips. Field screening results and observations from the borehole were documented on a lithologic/soil sampling log, which is included as Appendix B. The borehole was backfilled with the soil removed and BTA repaired the tear in the liner. The delineation soil sample locations are depicted on Figure 2. Photographic documentation was conducted at the Site. A photographic log is included in Appendix C.

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 at or below 4 degrees Celsius (°C) under strict chain-of-custody (COC) procedures to Cardinal Laboratories (Cardinal) in Hobbs, New Mexico, for analysis of BTEX following United States Environmental Protection Agency (EPA) Method 8021B; TPH-gasoline range organics (GRO), TPH-diesel range organics (DRO), and TPH-oil range organics (ORO) following EPA Method 8015M/D; and chloride following EPA Method SM4500.

LABORATORY ANALYTICAL RESULTS

Laboratory analytical results for delineation soil sample BH01, collected at 0.5 feet bgs directly below the tear in the liner, indicated TPH and chloride concentrations exceeded the Closure Criteria. Subsequent delineation samples BH01A and BH01B, collected at 3 feet and 4 feet bgs, indicated benzene, BTEX, TPH, and chloride concentrations were compliant with the Closure Criteria.

Laboratory analytical results for the delineation soil samples SS01 through SS04, collected around the lined containment, indicated benzene, BTEX, TPH, and chloride concentrations were compliant with the Closure Criteria and successfully define the lateral extent of the release. Laboratory analytical results are summarized in Table 1 and the complete laboratory analytical reports are included as Appendix D.

DEFERRAL REQUEST

BTA is requesting deferral of final remediation due to the presence of active production equipment and surface pipelines within the lined containment. The impacted soil is limited to the area immediately beneath the lined containment and active production equipment, where remediation would require a major facility deconstruction.

The impacted soil remaining in place beneath the liner is delineated vertically by delineation soil samples BH01A and BH01B collected at 3 feet and 4 feet bgs and laterally by delineation soil samples SS01 through SS04. A maximum of 1,250 cubic yards of TPH and chloride impacted soil remains in place beneath the liner assuming a maximum 3-foot depth based on the delineation soil samples listed above, that were compliant with the Closure Criteria.

BTA does not believe deferment will result in imminent risk to human health, the environment, or groundwater. Depth to groundwater was determined to be between 50 feet bgs and 100 feet bgs, the release was contained laterally by the lined containment, and the impacted soil remaining in place is limited to the area immediately beneath the liner. The liner has been repaired by BTA which will restrict future vertical migration of residual impacts.

Based on the presence of active production equipment within the release area and the complete lateral and vertical delineation of impacted soil remaining in place, BTA requests deferral of final remediation for Incident Number NAPP2216725109 until final reclamation of the well pad or major construction, whichever comes first.

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 Scientist



Tacoma Morrissey
Senior Geologist

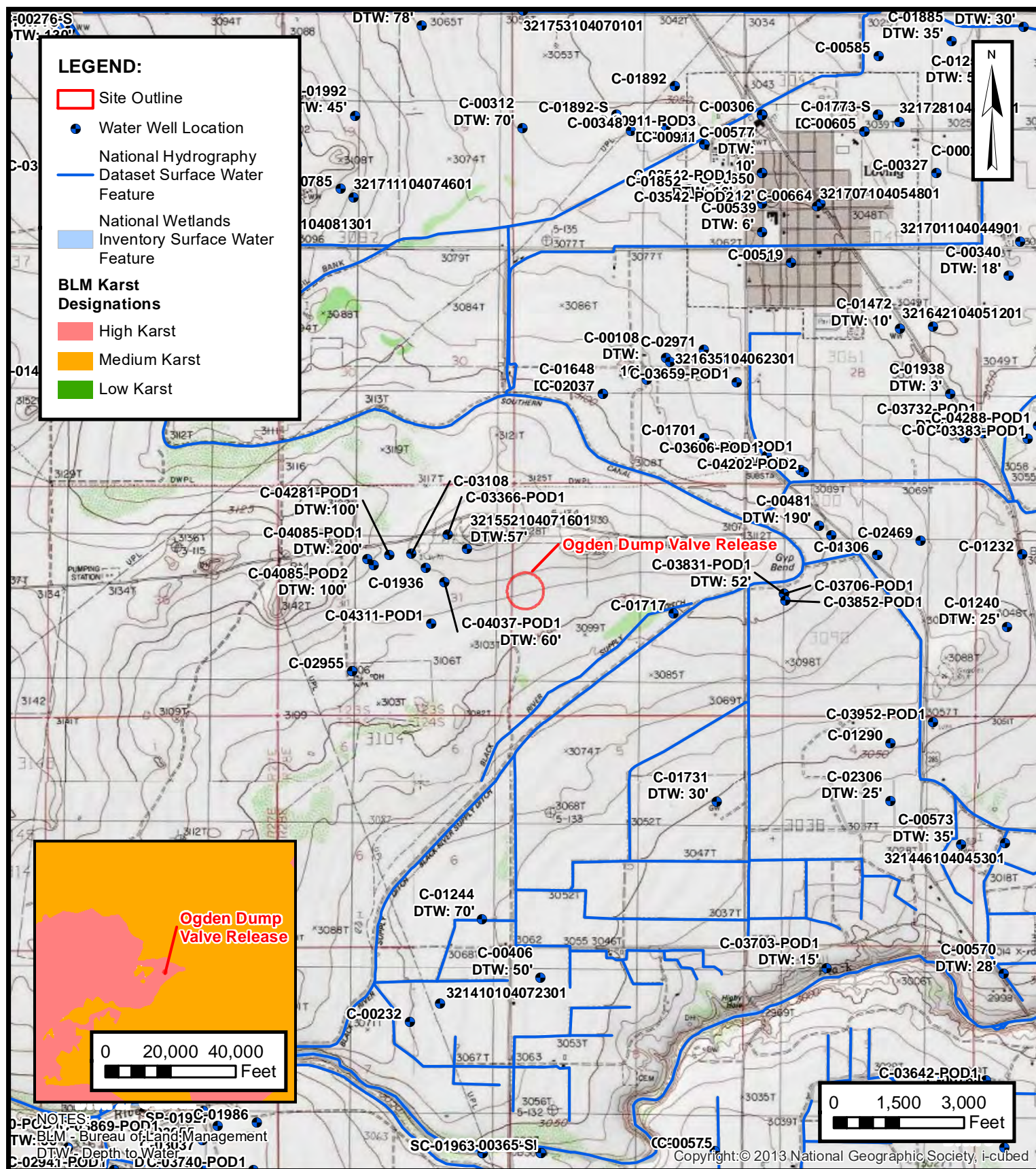
cc: Bob Hall, BTA
New Mexico State Land Office

Appendices:

Figure 1	Site Receptor Map
Figure 2	Delineation Soil Sample Locations
Table 1	Soil Sample Analytical Results
Appendix A	Referenced Well Records
Appendix B	Lithologic / Soil Sampling Logs
Appendix C	Photographic Log
Appendix D	Laboratory Analytical Reports & Chain-of-Custody Documentation
Appendix E	NMOCD Notifications



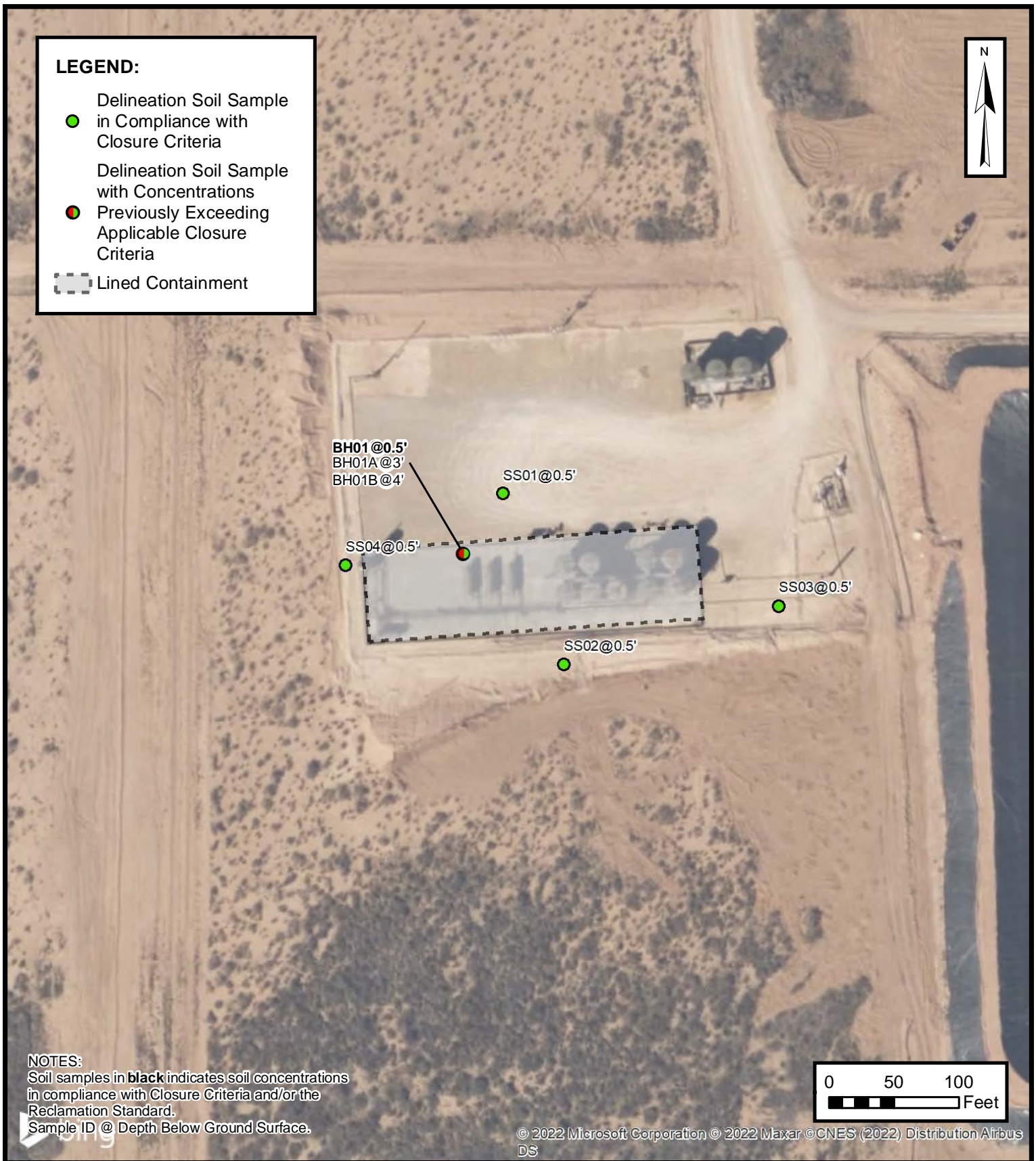
FIGURES



SITE RECEPTOR MAP

BTA OIL PRODUCERS, LLC
OGDEN DUMP VALVE RELEASE
NAPP2212458439
Sec 32 T23S R28E
Eddy County, New Mexico

FIGURE
1



DELINEATION SOIL SAMPLE LOCATIONS

BTA OIL PRODUCERS, LLC
 OGDEN DUMP VALVE RELEASE
 Incident Number NAPP2216725109
 Unit E Sec 32 T23S R28E
 Eddy County, New Mexico

FIGURE
2



TABLES



TABLE 1
SOIL SAMPLE ANALYTICAL RESULTS
Ogden Dump Valve Release
BTA Oil Producers, LLC
Incident Number NAPP2216725109
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 1 Closure Criteria (NMAC 19.15.29)			NE	NE	NE	NE	NE	NE	100	600
Delineation Soil Samples										
BH01	6/24/2022	0.5	<0.0500	<0.300	<10.0	408	76.9	408	485	2,200
BH01A	6/24/2022	3	<0.0500	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	160
BH01B	6/24/2022	4	<0.0500	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	400
SS01	7/19/2022	0.5	<0.0500	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	80.0
SS02	7/19/2022	0.5	<0.0500	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	64.0
SS03	7/19/2022	0.5	<0.0500	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	224
SS04	7/19/2022	0.5	<0.0500	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	32.0

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 1 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



[USGS Home](#)
[Contact USGS](#)
[Search USGS](#)

National Water Information System: Web Interface

USGS Water Resources

Data Category:

Groundwater

Geographic Area:

United States

GO

Click to hide News Bulletins

- Explore the *NEW* [USGS National Water Dashboard](#) interactive map to access real-time water data from over 13,500 stations nationwide.
- [Full News](#) 

Groundwater levels for the Nation

 Important: [Next Generation Monitoring Location Page](#)

Search Results -- 1 sites found

Agency code = usgs

site_no list =

- 321552104071601

Minimum number of levels = 1

[Save file of selected sites](#) to local disk for future upload

USGS 321552104071601 23S.28E.31.23142

Available data for this site

Groundwater: Field measurements

GO

Eddy County, New Mexico

Hydrologic Unit Code 13060011

Latitude 32°15'52", Longitude 104°07'16" NAD27

Land-surface elevation 3,139 feet above NAVD88

The depth of the well is 93 feet below land surface.

This well is completed in the Other aquifers (N9999OTHER) national aquifer.

This well is completed in the Alluvium, Bolson Deposits and Other Surface Deposits (110AVMB) local aquifer.

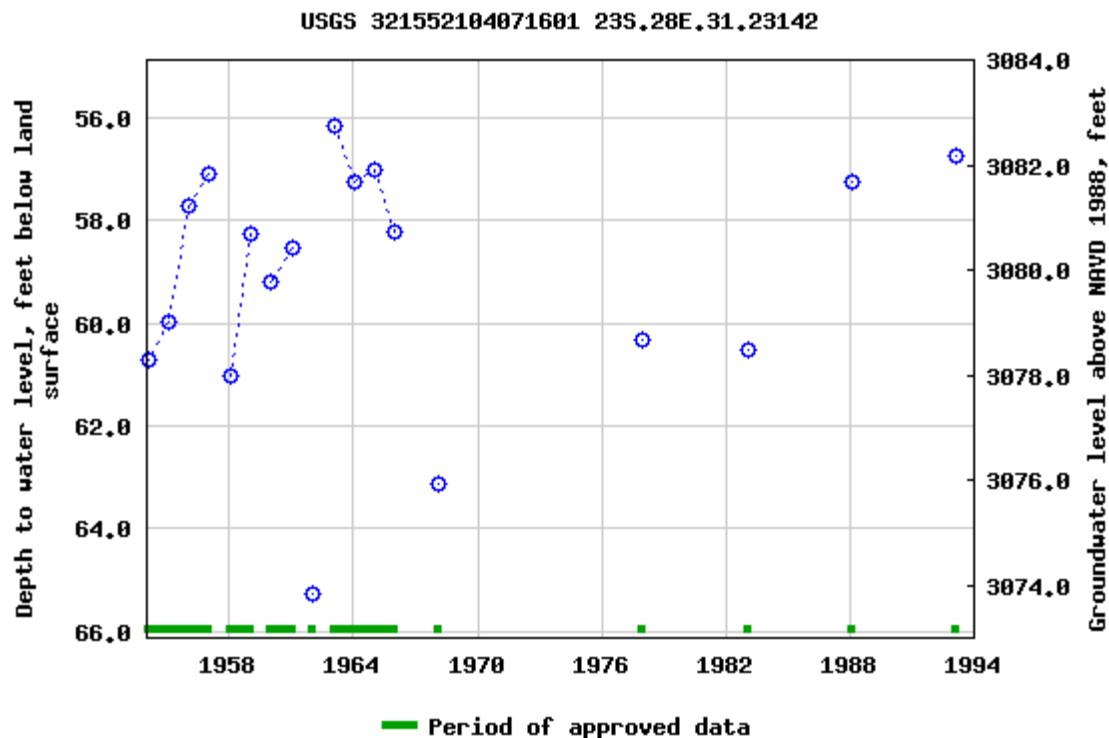
Output formats

[Table of data](#)

[Tab-separated data](#)

[Graph of data](#)

[Reselect period](#)



Breaks in the plot represent a gap of at least one year between field measurements.
[Download a presentation-quality graph](#)

[Questions about sites/data?](#)
[Feedback on this web site](#)
[Automated retrievals](#)
[Help](#)
[Data Tips](#)
[Explanation of terms](#)
[Subscribe for system changes](#)
[News](#)

[Accessibility](#) [FOIA](#) [Privacy](#) [Policies and Notices](#)

[U.S. Department of the Interior](#) | [U.S. Geological Survey](#)

Title: Groundwater for USA: Water Levels

URL: <https://nwis.waterdata.usgs.gov/nwis/gwlevels?>

Page Contact Information: [USGS Water Data Support Team](#)

Page Last Modified: 2022-06-23 17:05:23 EDT


0.59 0.5 nadww02





New Mexico Office of the State Engineer

Point of Diversion Summary

		(quarters are 1=NW 2=NE 3=SW 4=SE)							
		(quarters are smallest to largest)				(NAD83 UTM in meters)			
Well Tag	POD Number	Q64	Q16	Q4	Sec	Tws	Rng	X	Y
C	04037 POD1	4	3	2	31	23S	28E	582576	3569872 

Driller License: 1348 **Driller Company:** TAYLOR WATER WELL SERVICE

Driller Name: TAYLOR, CLINTON E.

Drill Start Date: 07/17/2017 **Drill Finish Date:** 07/18/2017 **Plug Date:**

Log File Date: 08/28/2017 **PCW Rev Date:** **Source:** Shallow

Pump Type: **Pipe Discharge Size:** **Estimated Yield:** 8 GPM

Casing Size: 4.50 **Depth Well:** 99 feet **Depth Water:** 60 feet

Water Bearing Stratifications:	Top	Bottom	Description
	60	82	Shale/Mudstone/Siltstone
	82	99	Shale/Mudstone/Siltstone

Casing Perforations:	Top	Bottom
	59	99

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.


6/23/22 3:00 PM

POINT OF DIVERSION SUMMARY



APPENDIX B

Lithologic Soil Sampling Logs

								Sample Name: BH01		Date: 6-24-2022	
								Site Name: Ogden Dump Valve Release			
								Incident Number: NAPP2216725109			
								Job Number: 03C22012003			
LITHOLOGIC / SOIL SAMPLING LOG								Logged By: CB		Method: Hand Auger	
Coordinates: 32.2620932, -104.1175805								Hole Diameter: 4"		Total Depth: 4 feet	
Comments: Field screening conducted with HACH Chloride Test Strips and PID for chloride and vapor, respectively. Chloride test performed with 1:4 dilution factor of soil to distilled water. No correction factors included.											
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions			
						0					
D	2,436	79.3	Y	BH01	0.5	0.5	CCHE	CALICHE, brown to red, large gravel clasts, poorly sorted, poorly graded, sand and silt, HC odor, staining.			
D	2,273.6	85.9	N			1	CCHE	SAA			
D	190.4	8.2	N			2	CCHE	SAA, more sand and silt, no odor, no staining.			
D	190.4	3.2	N	BH01A	3	3	CCHE	SAA			
D	520.8	3.3	N	BH01B	4	4	CCHE	SAA			
TD @ 4 feet bgs											



APPENDIX C

Photographic Log

**Photographic Log**

BTA Oil Producers, LLC

Ogden Dump Valve Release

Incident Number NAPP2216725109



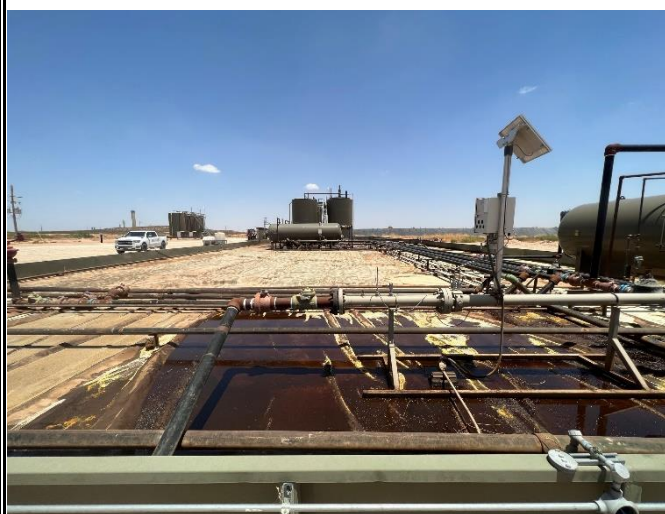
Photograph 1 Date: June 23, 2022

Description: Photo of release extent taken during Liner Inspection activities, facing southwest.



Photograph 2 Date: June 23, 2022

Description: Photo of release extent confined in secondary containment, facing southeast.



Photograph 3 Date: June 23, 2022

Description: Photo of release extent confined in secondary containment, facing east.



Photograph 4 Date: June 24, 2022

Description: Photo of BH01 location taken during delineation activities, facing south.



APPENDIX D

Laboratory Analytical Reports & Chain of Custody Documentation



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

June 29, 2022

TACOMA MORRISSEY

ENSOLUM

3122 NATIONAL PARKS HWY

CARLSBAD, NM 88220

RE: OGDEN 5H / 6H

Enclosed are the results of analyses for samples received by the laboratory on 06/27/22 11:19.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-21-14. 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
TACOMA MORRISSEY
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220
Fax To:

Received:	06/27/2022	Sampling Date:	06/24/2022
Reported:	06/29/2022	Sampling Type:	Soil
Project Name:	OGDEN 5H / 6H	Sampling Condition:	Cool & Intact
Project Number:	03C21012003 - 32.261866-104.177304	Sample Received By:	Tamara Oldaker
Project Location:	BTA - EDDY CO NM		

Sample ID: OGDEN SS .5' (H222729-01)

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	06/28/2022	ND	2.20	110	2.00	1.46	
Toluene*	<0.050	0.050	06/28/2022	ND	2.19	110	2.00	1.85	
Ethylbenzene*	<0.050	0.050	06/28/2022	ND	2.19	110	2.00	1.32	
Total Xylenes*	0.245	0.150	06/28/2022	ND	6.67	111	6.00	0.865	
Total BTX	<0.300	0.300	06/28/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 116 % 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	2200	16.0	06/28/2022	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	06/28/2022	ND	179	89.3	200	2.09	
DRO >C10-C28*	408	10.0	06/28/2022	ND	169	84.7	200	3.06	
EXT DRO >C28-C36	76.9	10.0	06/28/2022	ND					

Surrogate: 1-Chlorooctane 72.4 % 43-149

Surrogate: 1-Chlorooctadecane 105 % 42.5-161

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
TACOMA MORRISSEY
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220
Fax To:

Received: 06/27/2022
Reported: 06/29/2022
Project Name: OGDEN 5H / 6H
Project Number: 03C21012003 - 32.261866-104.177304
Project Location: BTA - EDDY CO NM

Sampling Date: 06/24/2022
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: OGDEN SS 3.0' (H222729-02)

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	06/28/2022	ND	2.20	110	2.00	1.46		
Toluene*	<0.050	0.050	06/28/2022	ND	2.19	110	2.00	1.85		
Ethylbenzene*	<0.050	0.050	06/28/2022	ND	2.19	110	2.00	1.32		
Total Xylenes*	<0.150	0.150	06/28/2022	ND	6.67	111	6.00	0.865		
Total BTEX	<0.300	0.300	06/28/2022	ND						

Surrogate: 4-Bromofluorobenzene (PID) 111 % 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	160	16.0	06/28/2022	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	06/28/2022	ND	179	89.3	200	2.09	
DRO >C10-C28*	<10.0	10.0	06/28/2022	ND	169	84.7	200	3.06	
EXT DRO >C28-C36	<10.0	10.0	06/28/2022	ND					

Surrogate: 1-Chlorooctane 70.0 % 43-149

Surrogate: 1-Chlorooctadecane 73.5 % 42.5-161

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
TACOMA MORRISSEY
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220
Fax To:

Received: 06/27/2022
Reported: 06/29/2022
Project Name: OGDEN 5H / 6H
Project Number: 03C21012003 - 32.261866-104.177304
Project Location: BTA - EDDY CO NM

Sampling Date: 06/24/2022
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: OGDEN SS 4.0' (H222729-03)

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	06/28/2022	ND	2.20	110	2.00	1.46		
Toluene*	<0.050	0.050	06/28/2022	ND	2.19	110	2.00	1.85		
Ethylbenzene*	<0.050	0.050	06/28/2022	ND	2.19	110	2.00	1.32		
Total Xylenes*	<0.150	0.150	06/28/2022	ND	6.67	111	6.00	0.865		
Total BTEX	<0.300	0.300	06/28/2022	ND						

Surrogate: 4-Bromofluorobenzene (PID) 112 % 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	400	16.0	06/28/2022	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	06/28/2022	ND	179	89.3	200	2.09	
DRO >C10-C28*	<10.0	10.0	06/28/2022	ND	169	84.7	200	3.06	
EXT DRO >C28-C36	<10.0	10.0	06/28/2022	ND					

Surrogate: 1-Chlorooctane 75.8 % 43-149

Surrogate: 1-Chlorooctadecane 81.1 % 42.5-161

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

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

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.

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]

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

July 28, 2022

TACOMA MORRISSEY

ENSOLUM

3122 NATIONAL PARKS HWY

CARLSBAD, NM 88220

RE: OGDEN DUMP VALVE RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 07/25/22 11:21.

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/ga/lab_accred_certif.html.

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

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

Cardinal Laboratories is accredited through the State of New Mexico Environment Department for:

Method SM 9223-B	Total Coliform and E. coli (Colilert MMO-MUG)
Method EPA 524.2	Regulated VOCs and Total Trihalomethanes (TTHM)
Method EPA 552.2	Total Haloacetic Acids (HAA-5)

Accreditation applies to public drinking water matrices for State of Colorado and New Mexico.

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

Lab Director/Quality Manager



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

Analytical Results For:ENSOLUM
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220Project: OGDEN DUMP VALVE RELEASE
Project Number: 03C2012003
Project Manager: TACOMA MORRISSEY
Fax To:Reported:
28-Jul-22 16:29

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
SS01	H223248-01	Soil	19-Jul-22 08:45	25-Jul-22 11:21
SS02	H223248-02	Soil	19-Jul-22 08:50	25-Jul-22 11:21
SS03	H223248-03	Soil	19-Jul-22 08:55	25-Jul-22 11:21
SS04	H223248-04	Soil	19-Jul-22 09:00	25-Jul-22 11:21

07/28/22 - Client changed the sample IDs (see COC). This is the revised report and will replace the one sent earlier 07/28/22.

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 or 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 damage 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.

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

Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

ENSOLUM
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220

Project: OGDEN DUMP VALVE RELEASE
Project Number: 03C2012003
Project Manager: TACOMA MORRISSEY
Fax To:

Reported:
28-Jul-22 16:29

SS01
H223248-01 (Soil)

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
---------	--------	-----	-----------------	-------	----------	-------	---------	----------	--------	-------

Cardinal Laboratories**Inorganic Compounds**

Chloride	80.0		16.0	mg/kg	4	2072802	GM	28-Jul-22	4500-Cl-B	
----------	------	--	------	-------	---	---------	----	-----------	-----------	--

Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050		0.050	mg/kg	50	2072602	JH	26-Jul-22	8021B	
Toluene*	<0.050		0.050	mg/kg	50	2072602	JH	26-Jul-22	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	2072602	JH	26-Jul-22	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	2072602	JH	26-Jul-22	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	2072602	JH	26-Jul-22	8021B	

Surrogate: 4-Bromofluorobenzene (PID) 120 % 69.9-140 2072602 JH 26-Jul-22 8021B

Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0		10.0	mg/kg	1	2072616	MS	26-Jul-22	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	2072616	MS	26-Jul-22	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	2072616	MS	26-Jul-22	8015B	

Surrogate: 1-Chlorooctane 66.8 % 43-149 2072616 MS 26-Jul-22 8015B

Surrogate: 1-Chlorooctadecane 77.6 % 42.5-161 2072616 MS 26-Jul-22 8015B

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 or 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 damage 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
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220

Project: OGDEN DUMP VALVE RELEASE
Project Number: 03C2012003
Project Manager: TACOMA MORRISSEY
Fax To:

Reported:
28-Jul-22 16:29

SS02**H223248-02 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
---------	--------	-----	-----------------	-------	----------	-------	---------	----------	--------	-------

Cardinal Laboratories**Inorganic Compounds**

Chloride	64.0		16.0	mg/kg	4	2072802	GM	28-Jul-22	4500-Cl-B	
----------	------	--	------	-------	---	---------	----	-----------	-----------	--

Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050		0.050	mg/kg	50	2072602	JH	27-Jul-22	8021B	
Toluene*	<0.050		0.050	mg/kg	50	2072602	JH	27-Jul-22	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	2072602	JH	27-Jul-22	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	2072602	JH	27-Jul-22	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	2072602	JH	27-Jul-22	8021B	

Surrogate: 4-Bromofluorobenzene (PID) 119 % 69.9-140 2072602 JH 27-Jul-22 8021B

Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0		10.0	mg/kg	1	2072616	MS	26-Jul-22	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	2072616	MS	26-Jul-22	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	2072616	MS	26-Jul-22	8015B	

Surrogate: 1-Chlorooctane 71.3 % 43-149 2072616 MS 26-Jul-22 8015B

Surrogate: 1-Chlorooctadecane 79.8 % 42.5-161 2072616 MS 26-Jul-22 8015B

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 or 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 damage 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
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220

Project: OGDEN DUMP VALVE RELEASE
Project Number: 03C2012003
Project Manager: TACOMA MORRISSEY
Fax To:

Reported:
28-Jul-22 16:29

SS03**H223248-03 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
---------	--------	-----	-----------------	-------	----------	-------	---------	----------	--------	-------

Cardinal Laboratories**Inorganic Compounds**

Chloride	224		16.0	mg/kg	4	2072802	GM	28-Jul-22	4500-Cl-B	
-----------------	------------	--	------	-------	---	---------	----	-----------	-----------	--

Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050	0.050	mg/kg	50	2072602	JH	27-Jul-22	8021B	
Toluene*	<0.050	0.050	mg/kg	50	2072602	JH	27-Jul-22	8021B	
Ethylbenzene*	<0.050	0.050	mg/kg	50	2072602	JH	27-Jul-22	8021B	
Total Xylenes*	<0.150	0.150	mg/kg	50	2072602	JH	27-Jul-22	8021B	
Total BTEX	<0.300	0.300	mg/kg	50	2072602	JH	27-Jul-22	8021B	

Surrogate: 4-Bromofluorobenzene (PID)	118 %	69.9-140			2072602	JH	27-Jul-22	8021B	
---------------------------------------	-------	----------	--	--	---------	----	-----------	-------	--

Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0	10.0	mg/kg	1	2072616	MS	26-Jul-22	8015B	
DRO >C10-C28*	<10.0	10.0	mg/kg	1	2072616	MS	26-Jul-22	8015B	
EXT DRO >C28-C36	<10.0	10.0	mg/kg	1	2072616	MS	26-Jul-22	8015B	

Surrogate: 1-Chlorooctane	75.9 %	43-149			2072616	MS	26-Jul-22	8015B	
---------------------------	--------	--------	--	--	---------	----	-----------	-------	--

Surrogate: 1-Chlorooctadecane	87.5 %	42.5-161			2072616	MS	26-Jul-22	8015B	
-------------------------------	--------	----------	--	--	---------	----	-----------	-------	--

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 or 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 damage 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
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220

Project: OGDEN DUMP VALVE RELEASE
Project Number: 03C2012003
Project Manager: TACOMA MORRISSEY
Fax To:

Reported:
28-Jul-22 16:29

SS04**H223248-04 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
---------	--------	-----	-----------------	-------	----------	-------	---------	----------	--------	-------

Cardinal Laboratories**Inorganic Compounds**

Chloride	32.0		16.0	mg/kg	4	2072802	GM	28-Jul-22	4500-Cl-B	
----------	------	--	------	-------	---	---------	----	-----------	-----------	--

Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050		0.050	mg/kg	50	2072602	JH	27-Jul-22	8021B	
Toluene*	<0.050		0.050	mg/kg	50	2072602	JH	27-Jul-22	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	2072602	JH	27-Jul-22	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	2072602	JH	27-Jul-22	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	2072602	JH	27-Jul-22	8021B	

Surrogate: 4-Bromofluorobenzene (PID)			119 %	69.9-140		2072602	JH	27-Jul-22	8021B	
---------------------------------------	--	--	-------	----------	--	---------	----	-----------	-------	--

Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0		10.0	mg/kg	1	2072616	MS	26-Jul-22	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	2072616	MS	26-Jul-22	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	2072616	MS	26-Jul-22	8015B	

Surrogate: 1-Chlorooctane			63.8 %	43-149		2072616	MS	26-Jul-22	8015B	
---------------------------	--	--	--------	--------	--	---------	----	-----------	-------	--

Surrogate: 1-Chlorooctadecane			72.1 %	42.5-161		2072616	MS	26-Jul-22	8015B	
-------------------------------	--	--	--------	----------	--	---------	----	-----------	-------	--

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 or 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 damage 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
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220

Project: OGDEN DUMP VALVE RELEASE
Project Number: 03C2012003
Project Manager: TACOMA MORRISSEY
Fax To:

Reported:
28-Jul-22 16:29

Inorganic Compounds - Quality Control**Cardinal Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC Limits	RPD	RPD Limit	Notes
Batch 2072802 - 1:4 DI Water									
Blank (2072802-BLK1)					Prepared & Analyzed: 28-Jul-22				
Chloride	ND	16.0	mg/kg						
LCS (2072802-BS1)					Prepared & Analyzed: 28-Jul-22				
Chloride	416	16.0	mg/kg	400	104	80-120			
LCS Dup (2072802-BSD1)					Prepared & Analyzed: 28-Jul-22				
Chloride	416	16.0	mg/kg	400	104	80-120	0.00	20	

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 or 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 damage 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
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220

Project: OGDEN DUMP VALVE RELEASE
Project Number: 03C2012003
Project Manager: TACOMA MORRISSEY
Fax To:

Reported:
28-Jul-22 16:29

Volatile Organic Compounds by EPA Method 8021 - Quality Control**Cardinal Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
---------	--------	-----------------	-------	-------------	---------------	------	-------------	-----	-----------	-------

Batch 2072602 - Volatiles**Blank (2072602-BLK1)**

Prepared & Analyzed: 26-Jul-22

Benzene	ND	0.050	mg/kg							
Toluene	ND	0.050	mg/kg							
Ethylbenzene	ND	0.050	mg/kg							
Total Xylenes	ND	0.150	mg/kg							
Total BTEX	ND	0.300	mg/kg							
Surrogate: 4-Bromofluorobenzene (PID)	0.0588		mg/kg	0.0500		118	69.9-140			

LCS (2072602-BS1)

Prepared & Analyzed: 26-Jul-22

Benzene	2.05	0.050	mg/kg	2.00		103	83.4-122			
Toluene	2.13	0.050	mg/kg	2.00		107	84.2-126			
Ethylbenzene	2.19	0.050	mg/kg	2.00		109	84.2-121			
m,p-Xylene	4.52	0.100	mg/kg	4.00		113	89.9-126			
o-Xylene	2.18	0.050	mg/kg	2.00		109	84.3-123			
Total Xylenes	6.70	0.150	mg/kg	6.00		112	89.1-124			
Surrogate: 4-Bromofluorobenzene (PID)	0.0571		mg/kg	0.0500		114	69.9-140			

LCS Dup (2072602-BSD1)

Prepared & Analyzed: 26-Jul-22

Benzene	2.03	0.050	mg/kg	2.00		102	83.4-122	1.00	12.6	
Toluene	2.12	0.050	mg/kg	2.00		106	84.2-126	0.572	13.3	
Ethylbenzene	2.16	0.050	mg/kg	2.00		108	84.2-121	1.15	13.9	
m,p-Xylene	4.46	0.100	mg/kg	4.00		111	89.9-126	1.49	13.6	
o-Xylene	2.12	0.050	mg/kg	2.00		106	84.3-123	2.63	14.1	
Total Xylenes	6.58	0.150	mg/kg	6.00		110	89.1-124	1.86	13.4	
Surrogate: 4-Bromofluorobenzene (PID)	0.0569		mg/kg	0.0500		114	69.9-140			

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 or 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 damage 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
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220

Project: OGDEN DUMP VALVE RELEASE
Project Number: 03C2012003
Project Manager: TACOMA MORRISSEY
Fax To:

Reported:
28-Jul-22 16:29

Petroleum Hydrocarbons by GC FID - Quality Control**Cardinal Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
---------	--------	--------------------	-------	----------------	------------------	------	----------------	-----	--------------	-------

Batch 2072616 - General Prep - Organics**Blank (2072616-BLK1)**

Prepared & Analyzed: 26-Jul-22

GRO C6-C10	ND	10.0	mg/kg							
DRO >C10-C28	ND	10.0	mg/kg							
EXT DRO >C28-C36	ND	10.0	mg/kg							
Surrogate: 1-Chlorooctane	43.5		mg/kg	50.0		87.1	43-149			
Surrogate: 1-Chlorooctadecane	50.7		mg/kg	50.0		101	42.5-161			

LCS (2072616-BS1)

Prepared & Analyzed: 26-Jul-22

GRO C6-C10	190	10.0	mg/kg	200		94.9	78.5-128			
DRO >C10-C28	206	10.0	mg/kg	200		103	75.8-135			
Total TPH C6-C28	396	10.0	mg/kg	400		99.0	81.5-127			
Surrogate: 1-Chlorooctane	48.8		mg/kg	50.0		97.7	43-149			
Surrogate: 1-Chlorooctadecane	57.6		mg/kg	50.0		115	42.5-161			

LCS Dup (2072616-BS1)

Prepared & Analyzed: 26-Jul-22

GRO C6-C10	198	10.0	mg/kg	200		99.2	78.5-128	4.49	21.4	
DRO >C10-C28	205	10.0	mg/kg	200		103	75.8-135	0.347	17.9	
Total TPH C6-C28	404	10.0	mg/kg	400		101	81.5-127	2.00	17.6	
Surrogate: 1-Chlorooctane	50.8		mg/kg	50.0		102	43-149			
Surrogate: 1-Chlorooctadecane	58.2		mg/kg	50.0		116	42.5-161			

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 or 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 damage 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

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

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 or 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 damage 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.

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

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: <u>Gasolun</u>		BILL TO		ANALYSIS REQUEST																			
Project Manager: <u>Tacoma Morris</u>		P.O. #:																					
Address: <u>7122 National Parks Hwy</u>		Company: <u>BTA Oil</u>																					
City: <u>Carlsbad, NM</u>		Attn: <u>Bob Hall</u>																					
State: <u>NM</u> Zip: <u>88220</u>		Address: <u>1045 Pecos St</u>																					
Phone #:		City: <u>Midland</u>																					
Fax #:		State: <u>TX</u> Zip: <u>79701</u>																					
Project #: <u>0302012003</u>		Project Owner:																					
Project Name: <u>Order Pump Valve Release</u>		State: <u>TX</u> Zip: <u>79701</u>																					
Project Location: <u>Edley Quarry</u>		Phone #:																					
Sampler Name: <u>Chris Brown</u>		Fax #:																					
FOR LAB USE ONLY																							
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX			PRESERV.	SAMPLING															
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :	DATE	TIME	CHL	BTX	TPH						
<u>H223248</u>	<u>5501</u>	<u>G</u>	<u>1</u>			<u>/</u>							<u>7-19</u>	<u>0845</u>	<u>/</u>	<u>/</u>	<u>/</u>						
	<u>5502</u>	<u>G</u>	<u>1</u>			<u>/</u>							<u>7-19</u>	<u>0850</u>	<u>/</u>	<u>/</u>	<u>/</u>						
	<u>5503</u>	<u>G</u>	<u>1</u>			<u>/</u>							<u>7-19</u>	<u>0855</u>	<u>/</u>	<u>/</u>	<u>/</u>						
	<u>5504</u>	<u>G</u>	<u>1</u>			<u>/</u>							<u>7-19</u>	<u>0900</u>	<u>/</u>	<u>/</u>	<u>/</u>						
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 analysis. 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 interruption, 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 rendered by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.																							
Relinquished By: <u>[Signature]</u>		Date: <u>7-8-22</u>		Received By: <u>[Signature]</u>		Date: <u>7/8/22</u>		Time: <u>1030</u>		Time: <u>1121</u>		REMARKS: <u>* Sample IDs changed as per Tacoma. 7/28/22</u>											
Relinquished By: <u>[Signature]</u>		Date: <u>7/8/22</u>		Received By: <u>[Signature]</u>		Date: <u>7/8/22</u>		Time: <u>1030</u>		Time: <u>1121</u>													
Delivered By: (Circle One)		Observed Temp. °C: <u>0.0</u>		Sample Condition		CHECKED BY: <u>[Signature]</u>		Turnaround Time: <u>Standard</u>		Bacteria (only) Sample Condition													
Sampler - UPS - Bus - Other:		Corrected Temp. °C: <u>0.0</u>		<input checked="" type="checkbox"/> Intact <input type="checkbox"/> Cool <input type="checkbox"/> Yes <input type="checkbox"/> No		<input checked="" type="checkbox"/> Intact <input type="checkbox"/> Cool <input type="checkbox"/> Yes <input type="checkbox"/> No		Thermometer ID #113		<input checked="" type="checkbox"/> Rush <input type="checkbox"/> Standard <input type="checkbox"/> Bacteria (only) Sample Condition													
								Correction Factor: <u>-0.0</u>		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No													

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



APPENDIX D

Form C-141

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	nAPP2216725109
District RP	
Facility ID	fAB1904636949
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)	nAPP2216725109
Contact mailing address	104 S Pecos Midland, TX 79701		

Location of Release Source

Latitude 32.261866 Longitude -104.117304
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Ogden Dump Valve Release	Site Type	Battery
Date Release Discovered	06-15-2022	API# (if applicable)	

Unit Letter	Section	Township	Range	County
E	32	23 S	28 E	Eddy

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)	6	Volume Recovered (bbls)	5
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls)	72	Volume Recovered (bbls)	70
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?		<input type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> Condensate	Volume Released (bbls)		Volume Recovered (bbls)	
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)		Volume Recovered (Mcf)	
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)		Volume/Weight Recovered (provide units)	

Cause of Release

Dump valve cut out and released produced fluids into lined secondary containment.


State of New Mexico
Oil Conservation Division

Incident ID	nAPP2216725109
District RP	
Facility ID	fAB1904636949
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? Release greater than 25 bbls
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? Yes, by Bob Hall on 06/16/2022 at 7 AM to the NMOCD via the NOR.	

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: 	Date: 9/15/2022
email: bhall@btaoil.com	Telephone: 432-682-3753
<u>OCD Only</u>	
Received by: Jocelyn Harimon	Date: 09/16/2022

Incident ID	nAPP2216725109
District RP	
Facility ID	fAB1904636949
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?	50-100 (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 checked="" type="checkbox"/> Yes <input 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

Page 4

Incident ID	nAPP2216725109
District RP	
Facility ID	fAB1904636949
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 ManagerSignature:  Date: 8/15/2022email: bhall@btaoil.com Telephone: 432-682-3753**OCD Only**Received by: Jocelyn Harimon Date: 09/16/2022

Incident ID	nAPP2216725109
District RP	
Facility ID	fAB1904636949
Application ID	

Remediation Plan

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

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

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

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

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

Printed Name: Kelton BeairdTitle: Environmental ManagerSignature: Date: 11/15/2023email: kbeaird@btaoil.comTelephone: 432-312-2203**OCD Only**Received by: Shelly Wells Date: 11/15/2023

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

Signature: _____

Date: _____

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 286052

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 286052
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	Deferral approved. Deferral of sample point BH01 is approved until plugging and abandonment or a major facility deconstruction, whichever comes first. A complete and accurate remediation report and/or reclamation report will need to be submitted at that time.	2/22/2024