



August 20, 2024

District Supervisor  
Oil Conservation Division, District 1  
1625 North French Drive  
Hobbs, New Mexico 88240

**Re: Liner Inspection Report and Closure Request  
BTA Oil Producers, LLC  
Hades Tank Battery Release  
Unit Letter A, Section 2, Township 23 South, Range 28 East  
Eddy County, New Mexico  
Incident ID# nAPP2328520901**

Sir or Madam:

BTA Oil Producers, LLC (BTA) contracted Tetra Tech, Inc. (Tetra Tech) to assess a release that occurred at the Hades Tank Battery. The release footprint is located within Public Land Survey System (PLSS) Unit Letter A, Section 2, Township 23 South, Range 28 East, in Eddy County, New Mexico (Site). The approximate release point occurred at coordinates 32.340477°, -104.053425°, as shown on Figure 1 and Figure 2. This release is located on State Trust land managed by the New Mexico State Land Office (NMSLO).

## BACKGROUND

On October 11, 2023, a release was discovered at the Hades Tank Battery. The cause of the release is indicated in the NOR as a hole that formed on the Y strainer on a line to the water transfer pump. Photographs provided by BTA indicate that the release footprint was limited to the lined containment area, as presented in Figure 3. The release was reported as approximately 480 bbls of produced water, of which 480 bbls of produced water were recovered and collected in an isolated tank for measurement.

A Notification of Release (NOR) was submitted to the New Mexico Oil Conservation Division (NMOCD) online portal system on October 12, 2023. Following the NOR submittal, the release was assigned the Incident ID nAPP2328520901. The NMOCD initial C-141 Initial Report was duly submitted via the NMOCD online portal system within the required timeframe. A copy of the NMOCD initial C-141 and NOR are included in Appendix A.

## SITE CHARACTERIZATION

A site characterization was performed in accordance with 19.15.29.11 New Mexico State Administrative Code (NMAC) and the guidance document Process Updates re: Submissions of Form C-141 Release Notification and Corrective Actions (12/01/2023).

A summary of the site characterization is presented below:

<b>Shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (feet bgs)</b>	<b>&lt; 50 feet bgs</b>
<b>Method used to determine the depth to ground water</b>	NM OSE iWaters Database Search
<b>Did this release impact groundwater or surface water?</b>	No

Tetra Tech

901 West Wall St., Suite 100, Midland, TX 79701

Tel 432.682.4559 Fax 432.682.3946 [www.tetrattech.com](http://www.tetrattech.com)

Liner Inspection Report and Closure Request  
August 20, 2024

BTA Oil Producers, LLC

<b><u>The minimum distance between the closest lateral extents of the release and the following surface areas:</u></b>	
<b>A continuously flowing watercourse or any other significant watercourse</b>	0.77 miles
<b>Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)</b>	2.73 miles
<b>An occupied permanent residence, school, hospital, institution, or church</b>	1.58 miles
<b>A spring or private domestic fresh water well used by less than five households for domestic or stock watering purposes</b>	1.2 miles
<b>Any other fresh water well or spring</b>	1.2 miles
<b>Incorporated municipal boundaries or a defined municipal fresh water well field</b>	3.76 miles
<b>A wetland</b>	0.15 miles
<b>A subsurface mine</b>	> 5 miles
<b>A (non-karst) unstable area</b>	>5 miles
<b>Categorized risk of this well / site being in a karst geology</b>	Medium
<b>A 100-year floodplain</b>	> 5 miles
<b>Did the release impact areas not on an exploration, development, production, or storage site?</b>	No

According to the New Mexico Office of the State Engineers (NMOSE) reporting system, there are two (2) ground water well records within ½ mile (800 meters) of the Site located approximately 700 to 750 meters east of the release location. No depth to water is included in the NMOSE reports. The site characterization data are presented in Appendix B.

## REGULATORY FRAMEWORK

Based upon the release footprint as contained completely within a lined secondary containment structure and in accordance with Subsection A(5)(a) of 19.15.29.11 NMAC, if the release occurred within a lined containment area, the responsible party must demonstrate liner integrity after affected material is removed and the affected area of the liner is exposed and provide the following:

- Certification on Form C-141 that the responsible party has visually inspected the liner where the release occurred, and the liner remains intact and had the ability to contain the leak in question; and
- The appropriate division district office is provided notification at least two business days before conducting the liner inspection.

## PREVIOUS WORK

Previous work was completed at the site by Hungry Horse, LLC. On January 24, 2024, Hungry Horse LLC notified NMOCDD that a liner inspection would be conducted on January 29, 2024. On January 29, 2024, Hungry Horse personnel inspected the liner. The liner and metal containment were thoroughly inspected from edge to edge, as well as around the tanks and process equipment installed on the liner itself. The liner was found to be in place, intact, with no visible, breaks, or tears. There was no evidence of the release escaping the metal containment area. Hungry Horse prepared a Liner Inspection and Closure Request on behalf of BTA. A completed Liner Inspection Form was included as a portion of the Hungry Horse reporting.

Liner Inspection Report and Closure Request  
August 20, 2024

BTA Oil Producers, LLC

## NMOCD REJECTION

The Hungry Horse Liner Inspection and Closure Request was rejected via email by the NMOCD on April 10, 2024, with the following reasoning:

- *"The Remediation Closure Report is denied. A liner Inspection should include facility/well name, date, and incident number. The liner doesn't appear to have been power washed (Example: Photo 13). The integrity of the liner can only be confirmed if the liner is clean, and the surface is viewable. (All dried mud, trash, salt remnants, and brush should be removed so that the surface of the liner can be inspected. A short checklist should include responsible party inspected liner, gravel was removed, liner was power washed, liner was able to contain the leak in question (no rips, tears, or holes), and remained intact. Also, photographs of clean intact liner illustrating liner integrity should be included, as well as a picture of the well location sign (name, location, emergency contact, etc.). Include the two business days' notice given to the OCD to conduct liner inspection on site. Form C-141 pages 1,2, and 6 should be signed/dated and included in the updated liner inspection report."*

## LINER INTEGRITY

Prior to the Tetra Tech liner inspection, the facility was power washed, thus, the integrity of the liner could be inspected and confirmed clean. In accordance with 19.15.29.11(A)(5)(a) NMAC, notification of a liner inspection at the Hades Tank Battery was submitted via the NMOCD portal on August 6, 2024. The liner inspection notification email is included in Appendix C.

On August 9, 2024, Tetra Tech personnel performed an inspection of the liner within the containment area of the Hades Tank Battery. This work was completed to verify the integrity of the liner. The liner was observed to underlie the entirety of the tank battery containment area. The liner was intact with no visible rips or tears and encompassed by an approximately 2-foot-tall muscle wall. The liner was anchored on the interior. At the time of the inspection, the liner was intact and had the ability to contain the documented release. Photographic documentation of the liner inspection is included in Appendix D.

## CONCLUSION

Based on the results of the liner inspection, BTA respectfully requests closure of the subject line incident. The release occurred within a lined containment area. The liner integrity demonstration is complete. The affected area of the liner has been visually inspected where the release occurred, and the liner remains intact and had the ability to contain the leak in question. Two business days' notice (C-141L) was provided to the appropriate division district office before conducting the liner inspection.

The final C-141 forms are enclosed in Appendix A. If you have any questions concerning the liner inspection for the Site, please call me at (512) 560-9064 or Christian at (512) 338-2861.

Sincerely,

**Tetra Tech, Inc.**



Nicholas M. Poole, G.I.T.  
Project Manager



Christian M. Llull, P.G.  
Program Manager

cc:

Mr. Ray Ramos, BTA Oil Producers, LLC

Liner Inspection Report and Closure Request  
August 20, 2024

BTA Oil Producers, LLC

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## LIST OF ATTACHMENTS

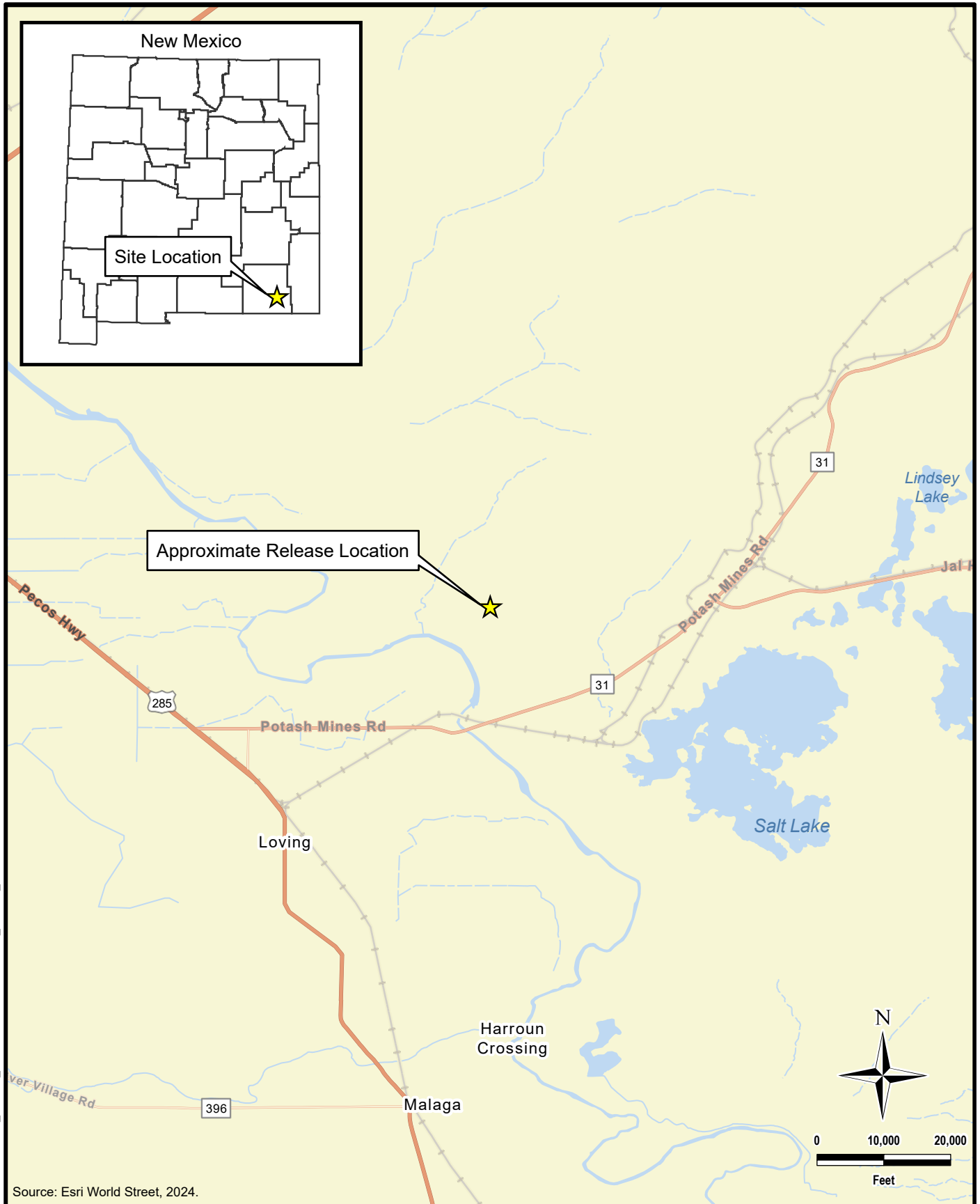
### Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Approximate Release Extent and Liner Inspection

### Appendices:

- Appendix A – C-141 Forms
- Appendix B – Site Characterization Data
- Appendix C – Regulatory Correspondence
- Appendix D – Photographic Documentation

## **FIGURES**



**TETRA TECH**

[www.tetrattech.com](http://www.tetrattech.com)

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Phone: (432) 682-4559  
Fax: (432) 682-3946

**BTA OIL PRODUCERS, LLC**

NAPP2328520901  
(32.340477°, -104.053425°)  
LEA COUNTY, NEW MEXICO

**HADES BATTERY RELEASE LINER INSPECTION  
OVERVIEW MAP**

PROJECT NO.: 212C-MD-3557

DATE: JULY 18, 2024

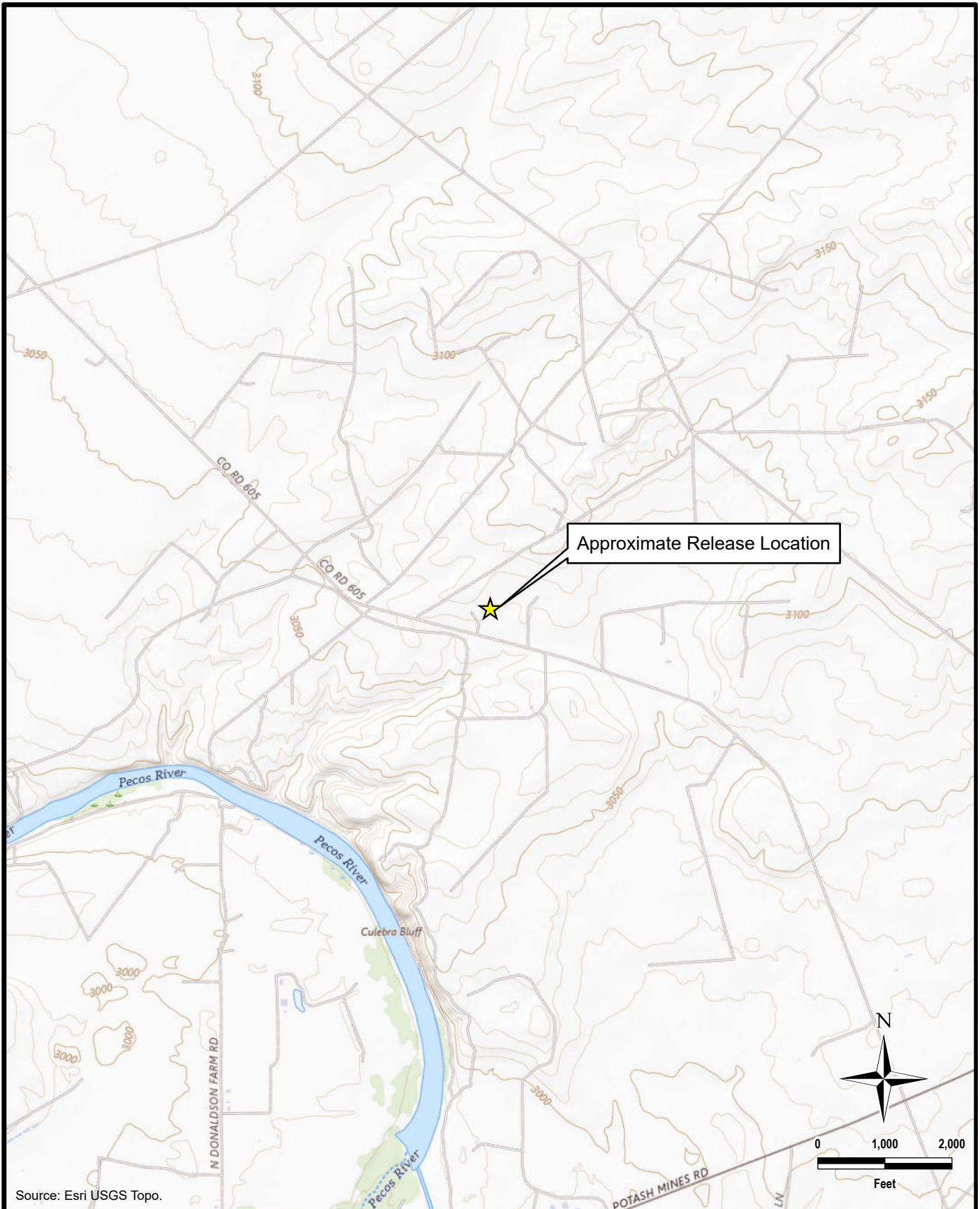
DESIGNED BY: LMV

Figure No.

**1**

DOCUMENT PATH: Y:\BTA\212C-MD-03557\_HADES\_BATTERY\212C-MD-03557\_HADES\_BATTERY.APRX





Source: Esri USGS Topo.



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LEA COUNTY, NEW MEXICO

**HADES BATTERY RELEASE LINER INSPECTION  
TOPOGRAPHIC MAP**

PROJECT NO.: 212C-MD-03557

DATE: JULY 18, 2024

DESIGNED BY: LMV

Figure No.

**2**

DOCUMENT PATH: Y:\BTA\212C-MD-03557\_HADES\_BATTERY\212C-MD-03557\_HADES\_BATTERY.APRX



DOCUMENT PATH: Y:\BTA\212C-MD-03557\_HADES\_BATTERY\212C-MD-03557\_HADES\_BATTERY.APRX



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NAPP2328520901  
(32.340477°, -104.053425°)  
LEA COUNTY, NEW MEXICO

**HADES BATTERY RELEASE LINER INSPECTION  
APPROXIMATE RELEASE EXTENT AND LINER INSPECTION**

PROJECT NO.: 212C-MD-03557

DATE: JULY 18, 2024

DESIGNED BY: LMV

Figure No.

**3**



## **APPENDIX A C-141 Forms**

**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

QUESTIONS

Action 274887

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 274887
	Action Type: [NOTIFY] Notification Of Release (NOR)

QUESTIONS

<b>Location of Release Source</b> <i>Please answer all the questions in this group.</i>	
Site Name	Hades Battery
Date Release Discovered	10/11/2023
Surface Owner	State

<b>Incident Details</b> <i>Please answer all the questions in this group.</i>	
Incident Type	Produced Water Release
Did this release result in a fire or is the result of a fire	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

<b>Nature and Volume of Release</b> <i>Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.</i>	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Corrosion   Flow Line - Injection   Produced Water   Released: 480 BBL   Recovered: 480 BBL   Lost: 0 BBL.
Is the concentration of dissolved chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	A hole formed on the Y strainer on the line to the water transfer pump causing fluid to release inside of the lined secondary containment. All released fluid was recovered via vac truck.

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State of New Mexico  
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QUESTIONS, Page 2  
Action 274887

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 274887
	Action Type: [NOTIFY] Notification Of Release (NOR)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by 19.15.29.7(A) NMAC	Yes, major release.
Reasons why this would be considered a submission for a notification of a major release	<ul style="list-style-type: none"><li>Unauthorized release of a volume, excluding gases, of 25 barrels or more</li></ul>
If YES, was immediate notice given to the OCD, by whom	Kelton Beaird
If YES, was immediate notice given to the OCD, to whom	OCD Enviro, Mike Bratcher, Robert Hamlet
If YES, was immediate notice given to the OCD, when	10/12/2023
If YES, was immediate notice given to the OCD, by what means (phone, email, etc.)	Email
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

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	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.
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 prepare and attach a narrative of actions to date in the follow-up C-141 submission. 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 prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.	

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ACKNOWLEDGMENTS  
  
Action 274887

ACKNOWLEDGMENTS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 274887
	Action Type: [NOTIFY] Notification Of Release (NOR)

ACKNOWLEDGMENTS

<input checked="" type="checkbox"/>	I acknowledge that I am authorized to submit notification of a releases on behalf of my operator.
<input checked="" type="checkbox"/>	I acknowledge that upon submitting this application, I will be creating a new incident file (assigned to my operator) to track the notification(s) and corrective action(s) for a release, pursuant to NMAC 19.15.29.
<input checked="" type="checkbox"/>	I acknowledge that creating a new incident file will require my operator to file subsequent submission(s) of form "C-141, Application for administrative approval of a release notification and corrective action", pursuant to NMAC 19.15.29.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	I acknowledge the fact that 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.
<input checked="" type="checkbox"/>	I acknowledge the fact that, 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.

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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 274887

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 274887
	Action Type: [NOTIFY] Notification Of Release (NOR)

CONDITIONS

Created By	Condition	Condition Date
kelton beaird	When submitting future reports regarding this release, please submit the calculations used or specific justification for the volumes reported on the initial C-141.	10/12/2023



District I  
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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	nAPP2328520901
District RP	
Facility ID	fAPP2129830547
Application ID	

Release Notification

Responsible Party

Responsible Party: BTA Oil Producers	OGRID: 260297
Contact Name: Kelton Beaird	Contact Telephone: 432-312-2203
Contact email: <a href="mailto:kbeaird@btaoil.com">kbeaird@btaoil.com</a>	Incident # (assigned by OCD) nAPP2328520901
Contact mailing address: 104 S. Pecos, Midland, TX, 79701	

Location of Release Source

Latitude 32.340477 \_\_\_\_\_ Longitude -104.053425 \_\_\_\_\_  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Hades Battery	Site Type: Tank Battery
Date Release Discovered: 10-11-2023	API# (if applicable)

Unit Letter	Section	Township	Range	County
A	02	23S	28E	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 type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 480	Volume Recovered (bbls) 480
	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: A hole formed on the Y strainer on the line to the water transfer pump causing fluid to release inside of the lined secondary containment. All released fluid was recovered via vac truck.

Method for volume:  
All recovered fluid was placed in an isolated tank and gauged to determine the amount released.

Incident ID	NAPP2328520901
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? 25 barrels or greater
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? Yes, by Kelton Beaird, to OCD Enviro, Mike Bratcher, and Robert Hamlet on 10-12-2023 by email.	

### 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: <u>Kelton Beaird</u>	Title: <u>Environmental Manager</u>
Signature: <u></u>	Date: <u>10-12-23</u>
email: <u>kbeaird@btaoil.com</u>	Telephone: <u>432-312-2203</u>
<b><u>OCD Only</u></b>	
Received by: <u>Shelly Wells</u>	Date: <u>10/13/2023</u>

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State of New Mexico  
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Oil Conservation Division  
1220 S. St Francis Dr.  
Santa Fe, NM 87505

CONDITIONS  
  
Action 274888

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 274888
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	None	2/21/2024

Incident ID	
District RP	
Facility ID	
Application ID	

## Site Assessment/Characterization

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

What is the shallowest depth to groundwater beneath the area affected by the release?	_____ (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input 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 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 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 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 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 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 type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

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

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

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

State of New Mexico  
Oil Conservation Division

Page 4

Incident ID	
District RP	
Facility ID	
Application ID	

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

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

email: \_\_\_\_\_ Telephone: \_\_\_\_\_

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_



Incident ID	
District RP	
Facility ID	
Application ID	

## Closure

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

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

- ☐ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☐ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☐ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☐ Description of remediation activities

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

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

Signature:  \_\_\_\_\_ Date: \_\_\_\_\_

email: \_\_\_\_\_ Telephone: \_\_\_\_\_

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

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

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

## **APPENDIX B**

### **Site Characterization Data**



# New Mexico Office of the State Engineer

## Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced,  
O=orphaned,  
C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)  
(quarters are smallest to largest)      (NAD83 UTM in meters)      (In feet)

POD Number	Code	POD Sub-basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Distance	DepthWell	DepthWater	Water Column
<a href="#">C 04417 POD1</a>		CUB	ED	4	3	3	36	22S	28E	589736	3578874	723	55		
<a href="#">C 04609 POD1</a>		CUB	ED	2	1	1	01	23S	28E	589816	3578589	736	51		
Average Depth to Water:															--
Minimum Depth:															--
Maximum Depth:															--

Record Count: 2

UTMNAD83 Radius Search (in meters):


Easting (X): 589079.715      Northing (Y): 3578569      Radius: 800

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.



# New Mexico Office of the State Engineer

## Point of Diversion Summary

		(quarters are 1=NW 2=NE 3=SW 4=SE)				(NAD83 UTM in meters)					
Well Tag	POD Number	Q64	Q16	Q4	Sec	Tws	Rng	X	Y		
NA	C 04417 POD1	4	3	3	36	22S	28E	589736	3578874 		
x											
<b>Driller License:</b>		1789		<b>Driller Company:</b>		HRL COMPLIANCE SOLUTIONS, INC					
<b>Driller Name:</b>		MARK MUMBY									
<b>Drill Start Date:</b>		03/31/2020		<b>Drill Finish Date:</b>		03/31/2020		<b>Plug Date:</b>			
<b>Log File Date:</b>		05/26/2020		<b>PCW Rev Date:</b>		<b>Source:</b>					
<b>Pump Type:</b>				<b>Pipe Discharge Size:</b>		<b>Estimated Yield:</b>					
<b>Casing Size:</b>				<b>Depth Well:</b>		55 feet		<b>Depth Water:</b>			
x											
<b>Casing Perforations:</b>				<b>Top</b>	<b>Bottom</b>						
				45	55						
x											

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.


7/16/24 3:23 PM

POINT OF DIVERSION SUMMARY



# 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		
NA	C 04609 POD1	2	1	1	01	23S	28E	589816	3578589		
<hr/>											
<b>Driller License:</b> 1757		<b>Driller Company:</b>				ENVIROTECH DRILLING SERVICES LLC					
<b>Driller Name:</b>		DAVID DRAYBUCK									
<b>Drill Start Date:</b> 04/26/2022		<b>Drill Finish Date:</b>				04/26/2022		<b>Plug Date:</b>		04/26/2022	
<b>Log File Date:</b> 05/26/2022		<b>PCW Rcv Date:</b>				<b>Source:</b>					
<b>Pump Type:</b>		<b>Pipe Discharge Size:</b>				<b>Estimated Yield:</b>					
<b>Casing Size:</b>		<b>Depth Well:</b>				51 feet		<b>Depth Water:</b>			
<hr/>											

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.

7/16/24 3:23 PM

POINT OF DIVERSION SUMMARY



# NM OCD - Permian Basin Karst Areas Map

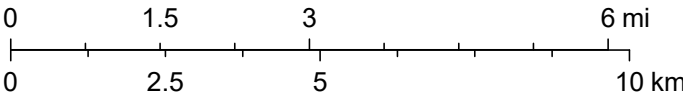


7/29/2024, 1:43:13 PM

1:144,448

Karst Occurrence Potential

- High
- Medium
- Low
- Critical Karst Resource Area



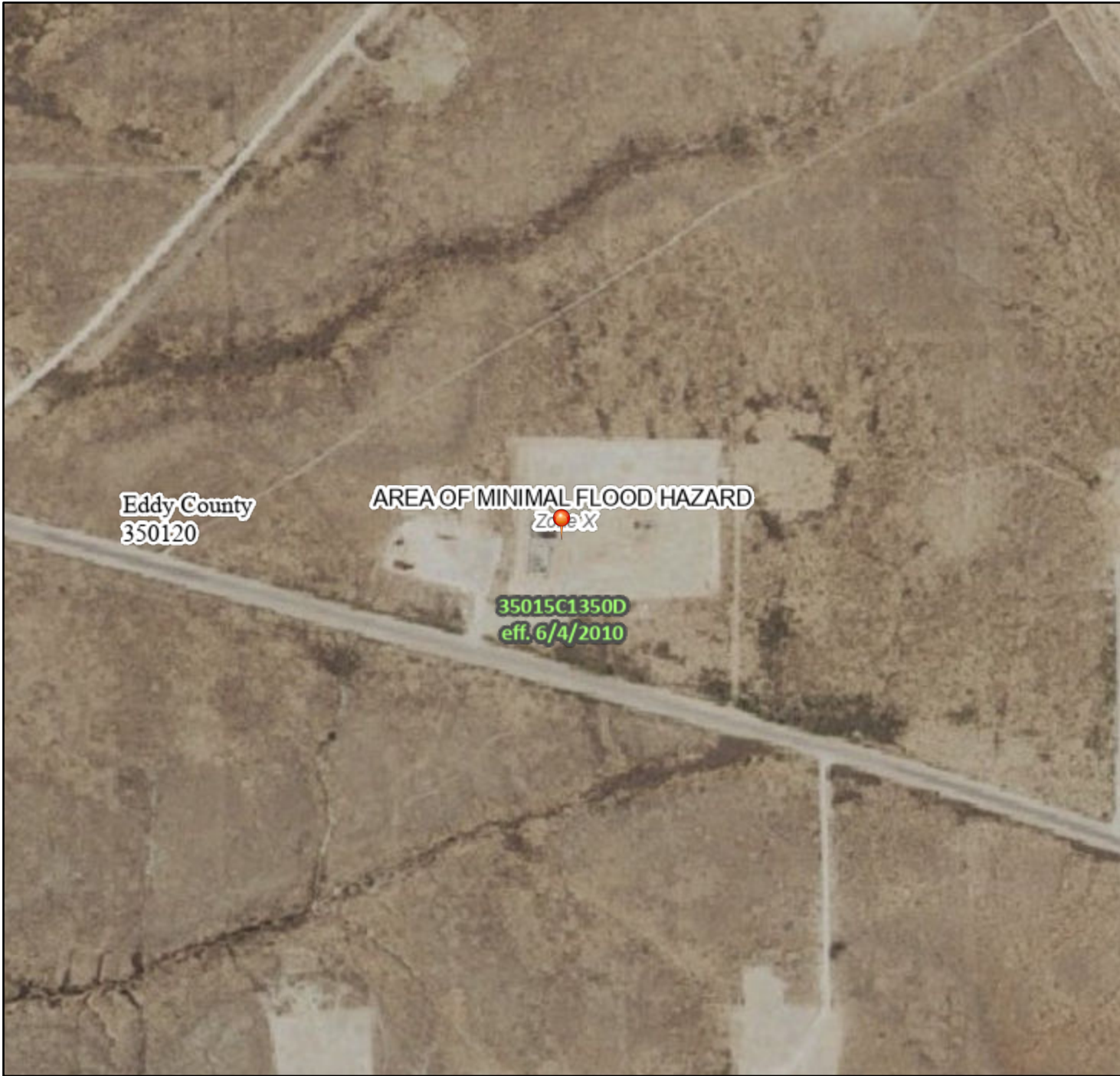
BLM, OCD, New Mexico Tech, Esri, HERE, Garmin, Earthstar Geographics



# National Flood Hazard Layer FIRMMette



104°3'31"W 32°20'41"N



1:6,000

104°2'54"W 32°20'11"N

Basemap Imagery Source: USGS National Map 2023

## Legend

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

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
		Profile Baseline
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped



The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

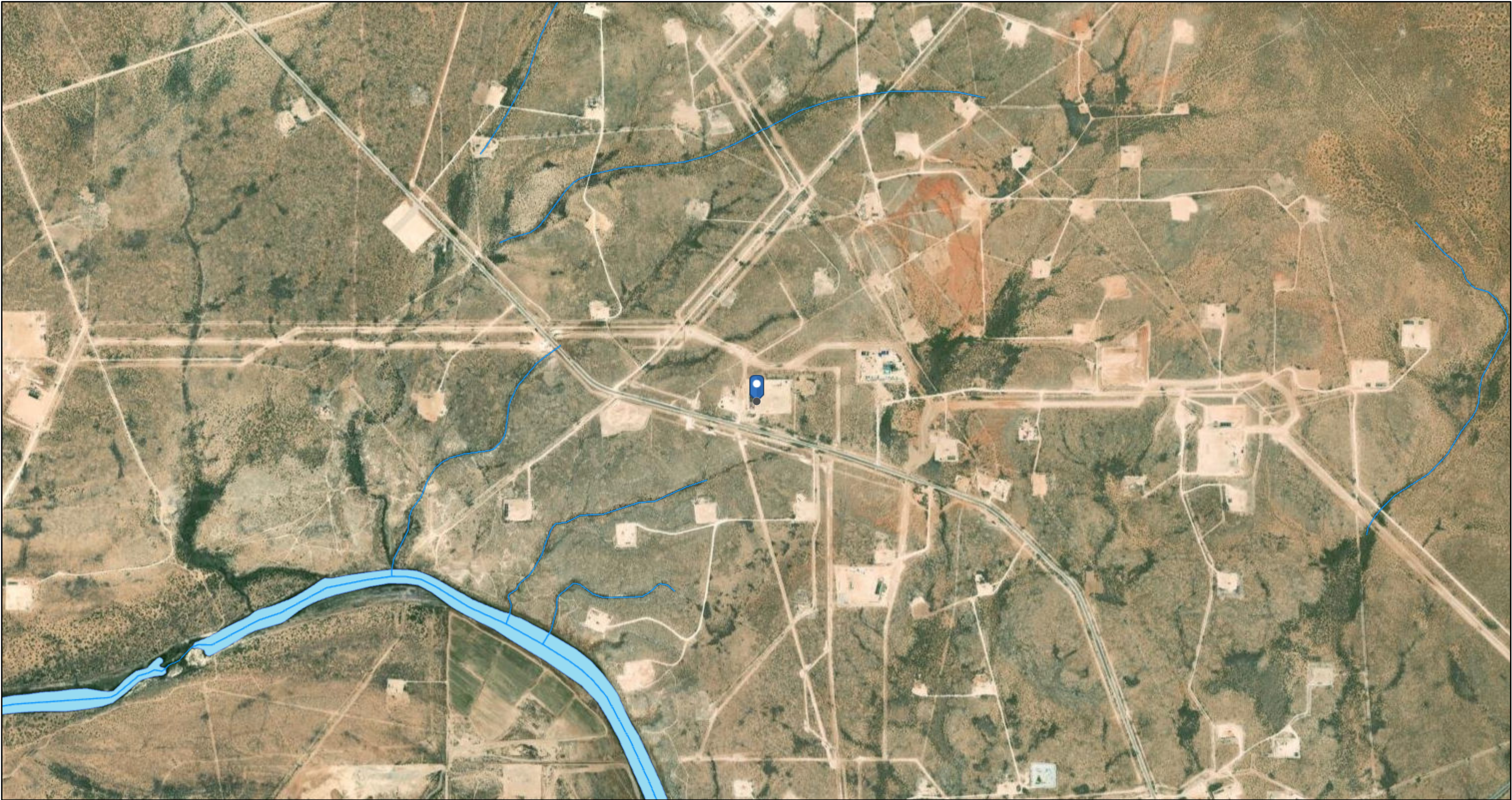
This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 7/29/2024 at 3:18 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

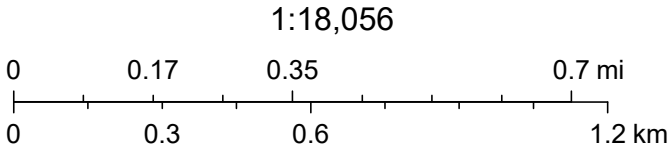


# NM OCD - Waterbodies Map



7/29/2024, 2:06:12 PM

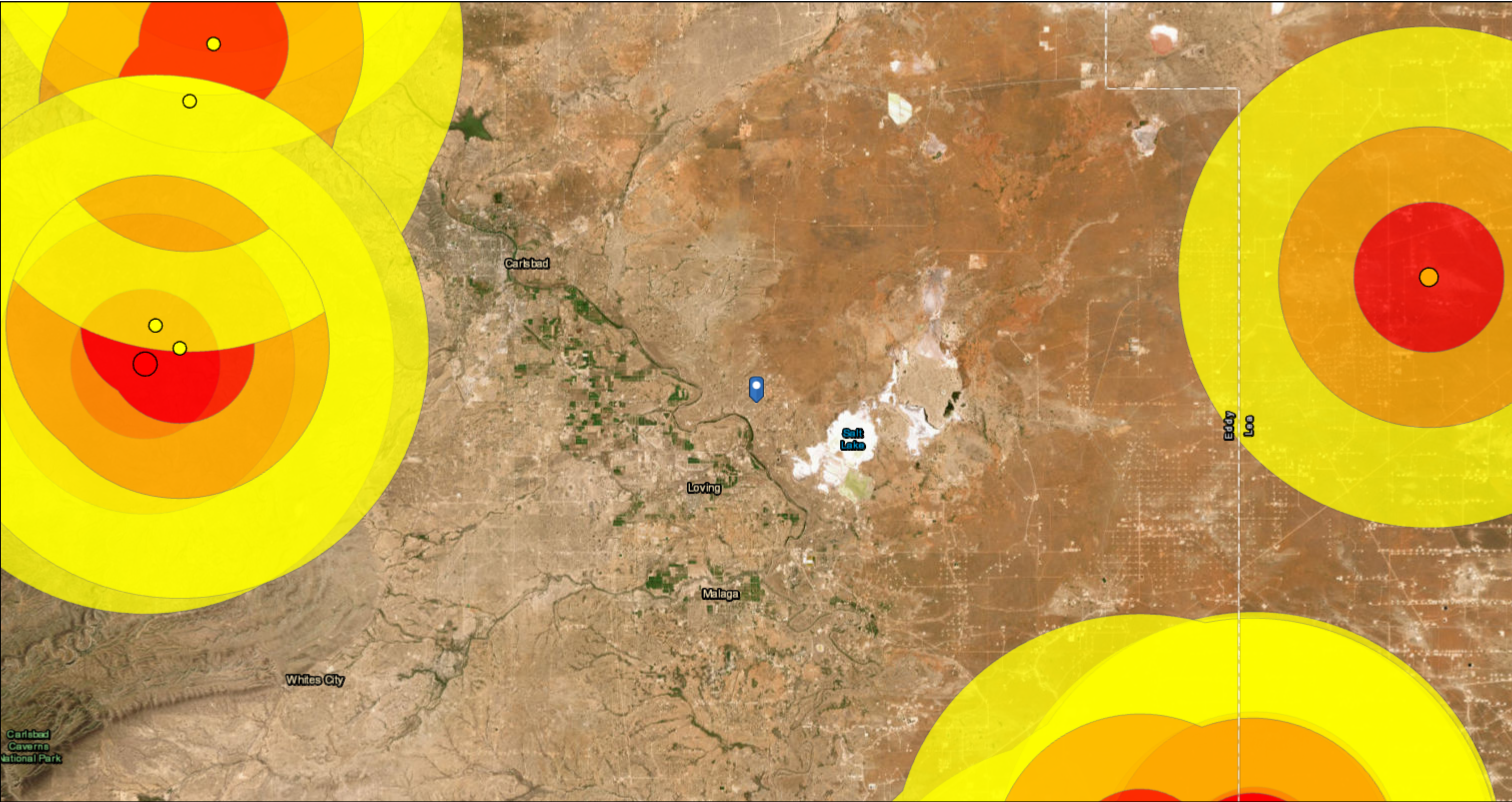
- OSW Water Bodys
- OSE Streams



Esri, HERE, Garmin, iPC, Maxar, NM OSE

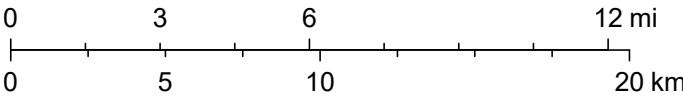
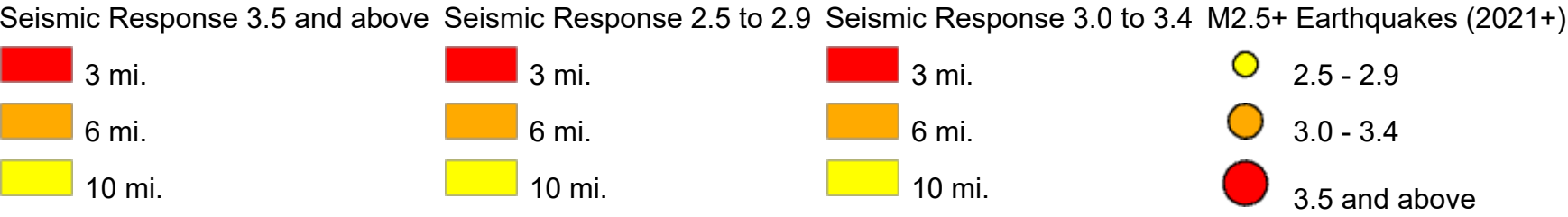


# NM OCD - Induced Seismicity Map



7/29/2024, 2:09:07 PM

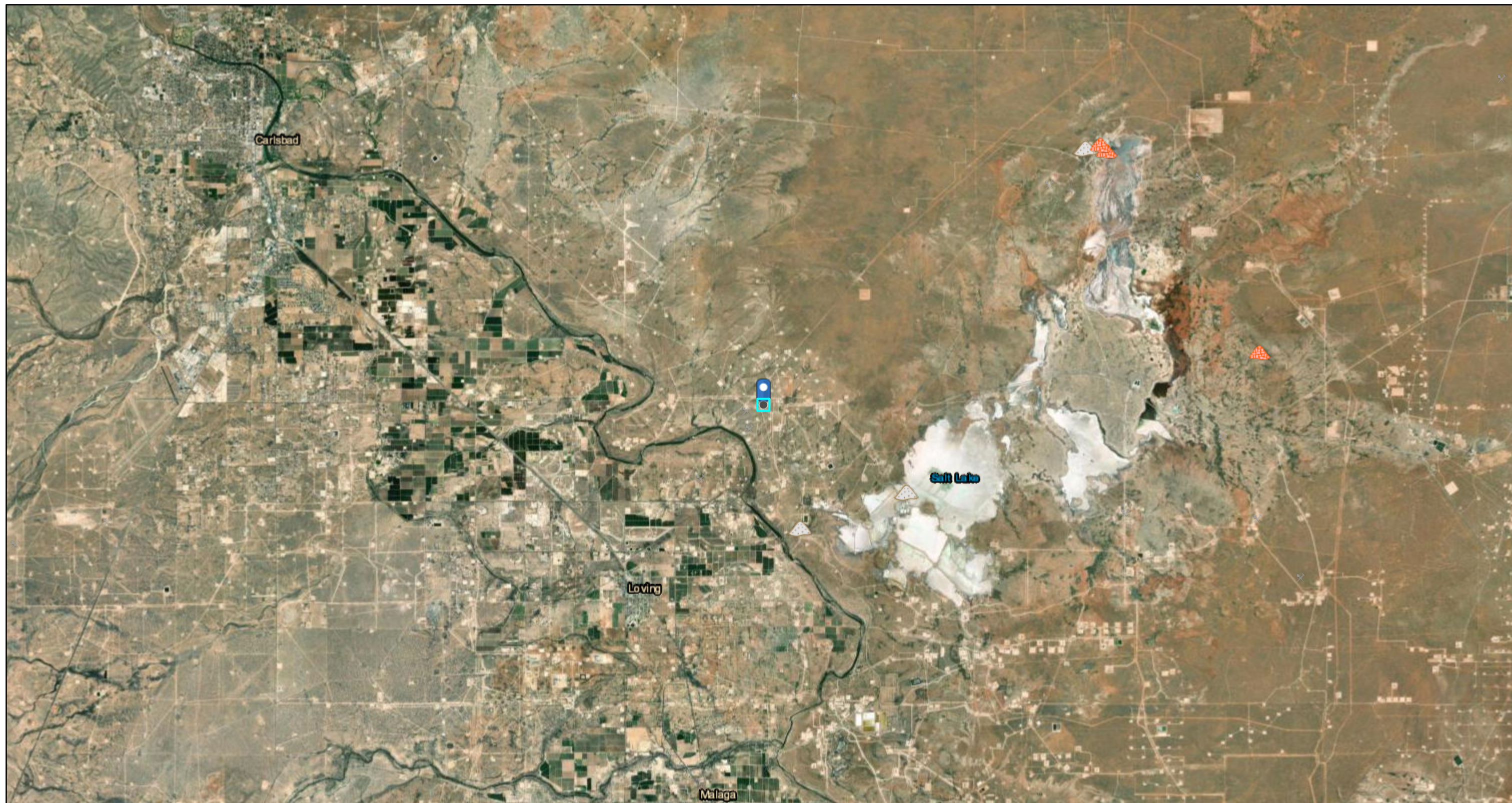
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Oil Conservation Division (OCD), Energy, Minerals and Natural Resources Department (EMNRD), Esri, HERE, Garmin, Earthstar Geographics



# Active Mines in New Mexico



7/29/2024, 2:20:26 PM

Registered Mines

✕

Aggregate, Stone etc.



Potash



Aggregate, Stone etc.

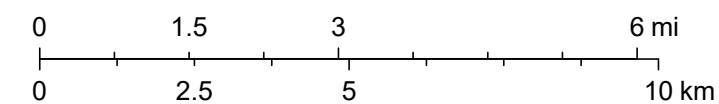


Aggregate, Stone etc.



Salt

1:144,448






Esri, HERE, Garmin, Earthstar Geographics

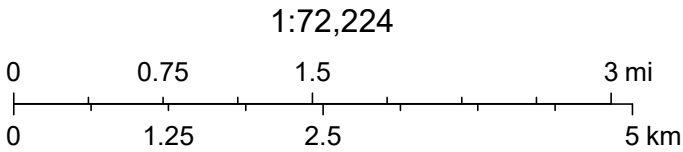


# Municipal Boundaries Map



7/29/2024, 2:44:20 PM

-  New Mexico Towns
-  NMDOT GPS ROADS
-  NMDOT Railroads



US Census Bureau, NMDOT, Esri, HERE, Garmin, Earthstar Geographics



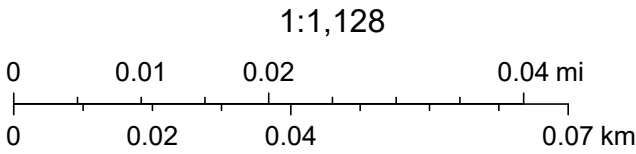
# NM OCD - Land Ownership Map



7/29/2024, 1:41:15 PM

Land Ownership

S



U.S. BLM, Maxar, Microsoft, Esri, HERE, Garmin, iPC

## **APPENDIX C**

### **Regulatory Correspondence**

**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**

QUESTIONS  
  
Action 370762

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 370762
	Action Type: [NOTIFY] Notification Of Liner Inspection (C-141L)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2328520901
Incident Name	NAPP2328520901 HADES BATTERY @ 0
Incident Type	Produced Water Release
Incident Status	Initial C-141 Approved
Incident Facility	[fAPP2129830547] Hades

Location of Release Source	
Site Name	HADES BATTERY
Date Release Discovered	10/11/2023
Surface Owner	State

Liner Inspection Event Information	
Please answer all the questions in this group.	
What is the liner inspection surface area in square feet	12,300
Have all the impacted materials been removed from the liner	Yes
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	08/09/2024
Time liner inspection will commence	09:00 AM
Please provide any information necessary for observers to liner inspection	Please contact Nicholas Poole at Nicholas.Poole@tetrattech.com to coordinate for the liner inspection
Please provide any information necessary for navigation to liner inspection site	The site is on the North side of U.S. Refinery Road approximately 1.93 miles north of Potash Mines Road, northeast of Lovington New Mexico, at 32.340477, -104.053425.



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State of New Mexico  
Energy, Minerals and Natural Resources  
Oil Conservation Division  
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CONDITIONS  
  
Action 370762

CONDITIONS

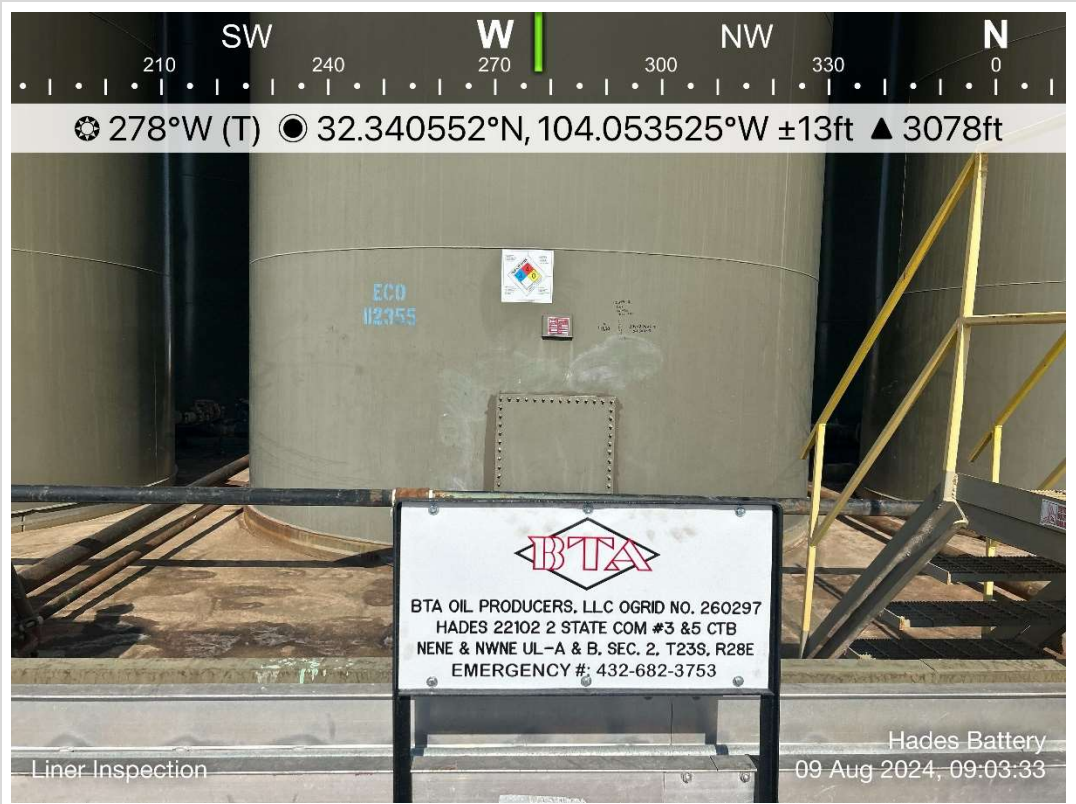
Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 370762
	Action Type: [NOTIFY] Notification Of Liner Inspection (C-141L)

CONDITIONS

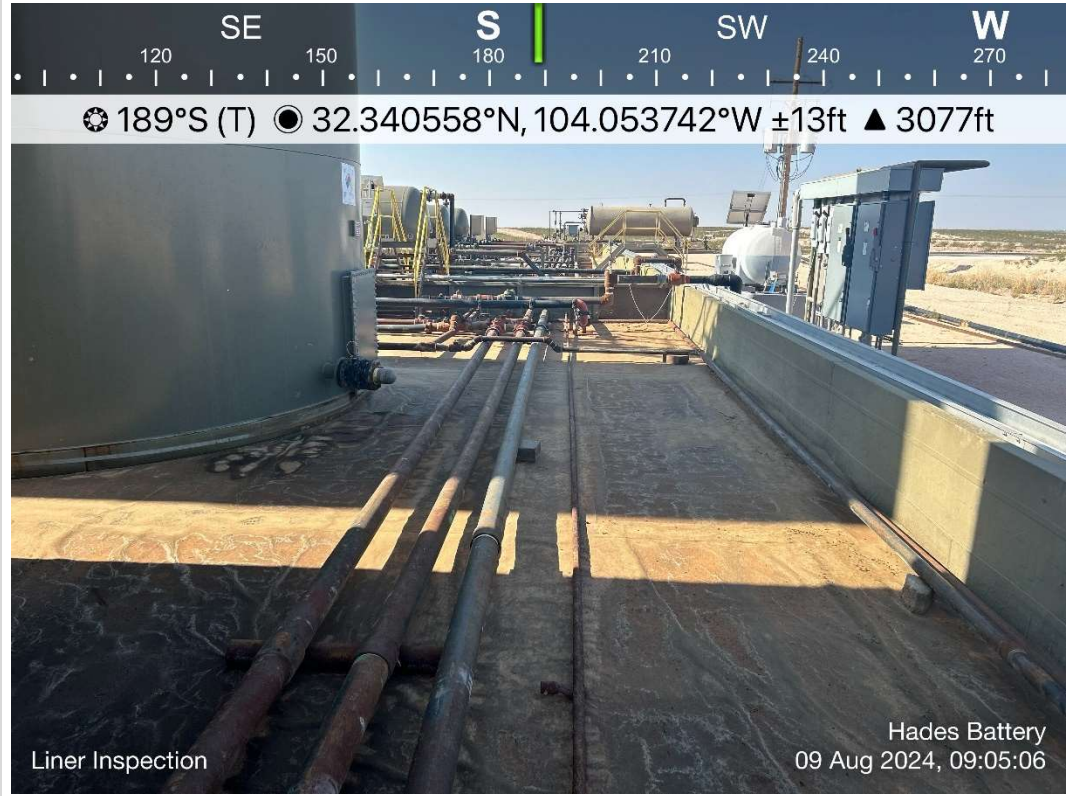
Created By	Condition	Condition Date
cterhune	Failure to notify the OCD of liner inspections including any changes in date/time per the requirements of 19.15.29.11.A(5)(a)(ii) NMAC, may result in the inspection not being accepted.	8/6/2024

## **APPENDIX D**

# **Photographic Documentation**



TETRA TECH, INC. PROJECT NO. 212C-MD-03557	DESCRIPTION	Site signage. Hades 22102 2 State Com #3 & 5 CTB and location information.	1
	SITE NAME	HADES TANK BATTERY	8/9/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03557	DESCRIPTION	View south. Current lined containment area conditions; no rips, holes or tears observed.	2
	SITE NAME	HADES TANK BATTERY	8/9/2024







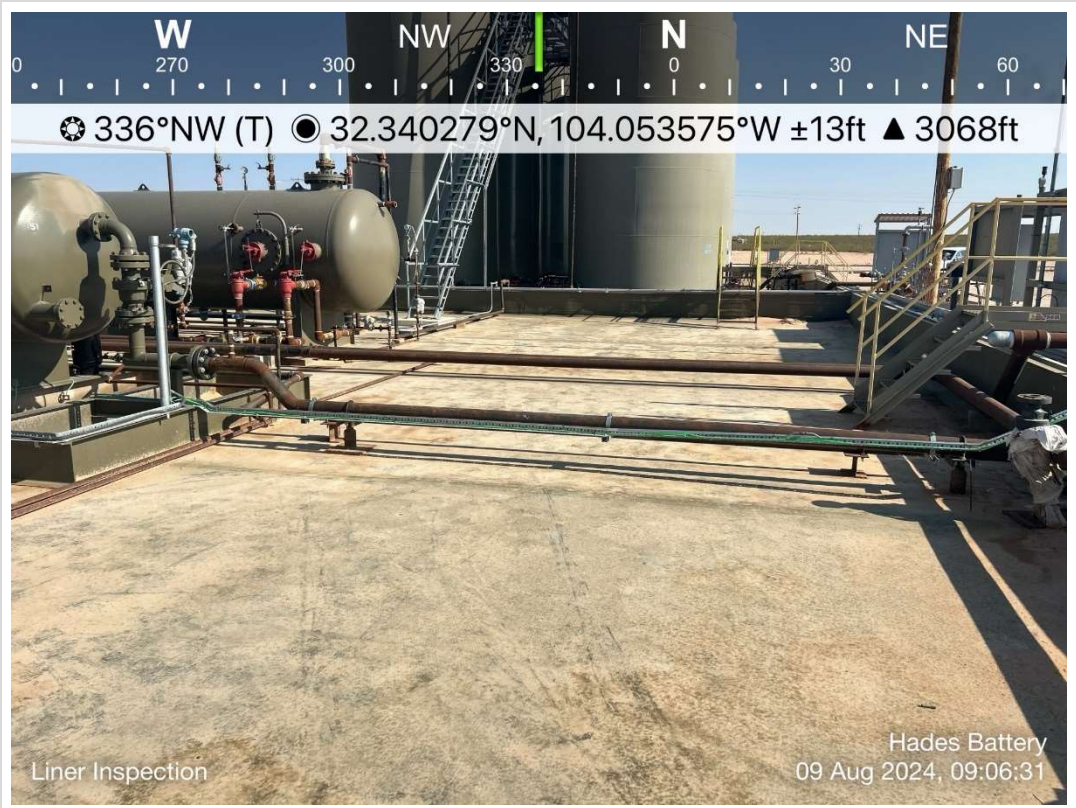


TETRA TECH, INC. PROJECT NO. 212C-MD-03557	DESCRIPTION	View south. Current lined containment area conditions; no rips, holes or tears observed.	5
	SITE NAME	HADES TANK BATTERY	8/9/2024

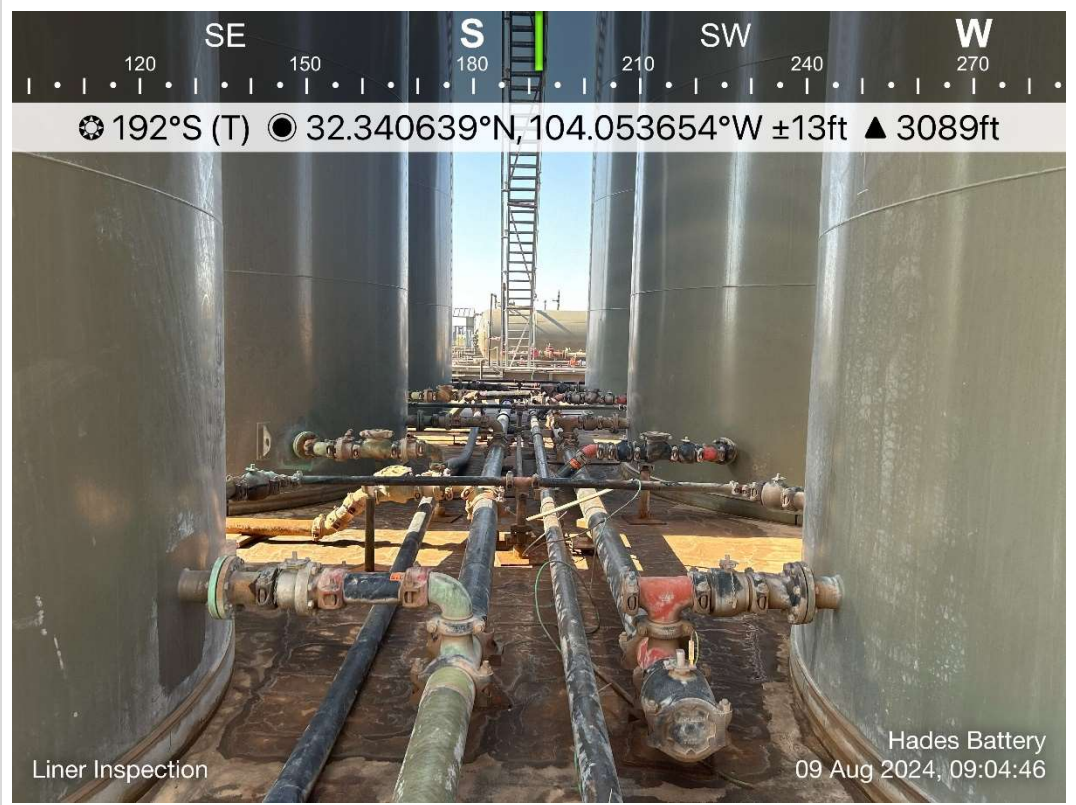


TETRA TECH, INC. PROJECT NO. 212C-MD-03557	DESCRIPTION	View southwest. Current lined containment area conditions; no rips, holes or tears observed.	6
	SITE NAME	HADES TANK BATTERY	8/9/2024





TETRA TECH, INC. PROJECT NO. 212C-MD-03557	DESCRIPTION	View north northwest. Current lined containment area conditions; no rips, holes or tears observed.	7
	SITE NAME	HADES TANK BATTERY	8/9/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03557	DESCRIPTION	View south. Current lined containment area conditions; no rips, holes or tears observed.	8
	SITE NAME	HADES TANK BATTERY	8/9/2024

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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

QUESTIONS  
Action 375677

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:	260297
	Action Number:	375677
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2328520901
Incident Name	NAPP2328520901 HADES BATTERY @ 0
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2129830547] Hades

Location of Release Source	
Please answer all the questions in this group.	
Site Name	HADES BATTERY
Date Release Discovered	10/11/2023
Surface Owner	State

Incident Details	
Please answer all the questions in this group.	
Incident Type	Produced Water Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Corrosion   Flow Line - Injection   Produced Water   Released: 480 BBL   Recovered: 480 BBL   Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	A hole formed on the Y strainer on the line to the water transfer pump causing fluid to release inside of the lined secondary containment. All released fluid was recovered via vac truck.

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Energy, Minerals and Natural Resources  
Oil Conservation Division  
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Santa Fe, NM 87505

QUESTIONS, Page 2

Action 375677

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 375677
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

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	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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.

I hereby agree and sign off to the above statement	Name: Nicholas Poole Title: with Tetrattech Email: nicholas.poole@tetrattech.com Date: 08/20/2024
--	--

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**Santa Fe, NM 87505**

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Action 375677

**QUESTIONS (continued)**

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:
	260297
	Action Number:
	375677
Action Type:	
[C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

**QUESTIONS****Site Characterization**

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). 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 in feet below ground surface (ft bgs)	Between 51 and 75 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Between ½ and 1 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Between 1 and 5 (mi.)
A wetland	Between 1000 (ft.) and ½ (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Medium
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

**Remediation Plan**

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

Requesting a remediation plan approval with this submission	Yes
Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.	
On what estimated date will the remediation commence	08/09/2024
On what date will (or did) the final sampling or liner inspection occur	08/09/2024
On what date will (or was) the remediation complete(d)	08/09/2024
What is the estimated surface area (in square feet) that will be remediated	12329
What is the estimated volume (in cubic yards) that will be remediated	0
These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.	
The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.	



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QUESTIONS, Page 4  
  
Action 375677

**QUESTIONS (continued)**

Operator:  BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:  260297
	Action Number:  375677
	Action Type:  [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Remediation Plan (continued)</b>	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
<b>This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:</b>	
<i>(Select all answers below that apply.)</i>	
Is (or was) there affected material present needing to be removed	No
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	No
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
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.	
I hereby agree and sign off to the above statement	Name: Nicholas Poole Title: with Tetrattech Email: nicholas.poole@tetrattech.com Date: 08/20/2024
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 6

Action 375677

**QUESTIONS (continued)**

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:	260297
	Action Number:	375677
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Liner Inspection Information</b>	
Last liner inspection notification (C-141L) recorded	<b>370762</b>
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	<b>08/09/2024</b>
Was all the impacted materials removed from the liner	<b>Yes</b>
What was the liner inspection surface area in square feet	<b>12300</b>

**Remediation Closure Request**

*Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.*

Requesting a remediation closure approval with this submission	<b>Yes</b>
Have the lateral and vertical extents of contamination been fully delineated	<b>Yes</b>
Was this release entirely contained within a lined containment area	<b>Yes</b>
What was the total surface area (in square feet) remediated	<b>12300</b>
What was the total volume (cubic yards) remediated	<b>0</b>
Summarize any additional remediation activities not included by answers (above)	The liner was observed to underlie the entirety of the tank battery containment area. The liner was intact with no visible rips or tears and encompassed by an approximately 2-foot-tall muscle wall. The liner was anchored on the interior. At the time of the inspection, the liner was intact and had the ability to contain the documented release.

*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 (in .pdf format) 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.*

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.

I hereby agree and sign off to the above statement	Name: Nicholas Poole Title: with Tetrattech Email: <a href="mailto:nicholas.poole@tetrattech.com">nicholas.poole@tetrattech.com</a> Date: 08/20/2024
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CONDITIONS  
  
Action 375677

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:
	260297
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Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

CONDITIONS

Created By	Condition	Condition Date
rhamlet	We have received your Remediation Closure Report for Incident #NAPP2328520901 HADES BATTERY, thank you. This Remediation Closure Report is approved.	8/23/2024