

# **SITE REMEDIATION AND CLOSURE REPORT**

## **REPORTABLE RELEASE**

### **Strata Production Company**

Cuervo Federal #2

GPS: Latitude 32.31065 Longitude -103.64864

Lea County, NM

Incident ID No. NAPP2116660414

Prepared by:



Pima Environmental Services, LLC

1601 N. Turner Ste 500

Hobbs, NM 88240

575-964-7740

**General Information**

This report was prepared by Pima Environmental Services, LLC in response to the release for Strata Production Company at the Cuervo Federal #2.

**Site Coordinates:** Latitude 32.31065 Longitude -103.64864

**API #:** 30-025-31434

**Release Description and Assessment**

The New Mexico Oil Conservation Division (NMOCD) conducted an on-site inspection on May 5, 2021. Upon the inspection found areas where obvious releases had occurred. Strata indicated that they were minor non-recordable releases. Strata has retained Pima Environmental to work with the NMOCD to get this NOR closed out by getting the stained areas cleaned up.

**Date of Spill:** 05/15/2021

**Type of Spill:** ☒Crude Oil ☒Produced Water ☐Condensate ☐Other (Specify):

**Comments:** Non-Reportable release

**Remediation Activity Summary**

Pima mobilized personnel and equipment to the site. Remediation activities were completed via in-situ bioremediation utilizing our Remediate Ground. Our chemicals were applied with our applicator trailer and utilizing hand tillers the chemicals were worked into the soil. The Remediate Ground encapsulates the hydrocarbons rendering them non-toxic and non-detectable under sampling events. In most cases it removes the staining from the soil. Before and after photos can be found in Appendix C.

**Closure Request**

After careful review, Pima requests that this NOR be closed. Strata Production Company has complied with the applicable closure requirements.

Should you have any questions or need additional information, please feel free to contact Chris Jones at 575-964-7740 or [chris@pimaoil.com](mailto:chris@pimaoil.com).

Respectfully,



Chris Jones  
Environmental Professional  
Pima Environmental Services, LLC

Appendix A- C-141  
Appendix B- Site Map  
Appendix C- Photographic Documentation



Pima Environmental Services

**Appendix A**

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	NAPP2116660414
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party: Strata Production Company	OGRID: 21712
Contact Name: Matt Murphy	Contact Telephone: 720-468-3646
Contact email: matt@stratanm.com	Incident # (assigned by OCD)
Contact mailing address: PO Box 1030, Roswell, NM 88202	

### Location of Release Source

Latitude 32.31065 Longitude -103.64864  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Cuervo Federal #2	Site Type:
Date Release Discovered:	API# (if applicable) 30-025-31434

Unit Letter	Section	Township	Range	County
C	14	23S	32E	Lea

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

### Nature and Volume of Release

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

<input checked="" type="checkbox"/> Crude Oil	Volume Released (bbls) De minimis	Volume Recovered (bbls) 0
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) De minimis	Volume Recovered (bbls) 0
	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 :

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

## 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: <b>6/1/21</b> <b>This C-141 is being filed as directed by NMOCD letter and attachments dated May 20, 2021. In general, Strata disputes the allegations, findings, and conclusions. Upon initial review and investigation, Strata disputes that any single event or accumulation of events resulted in a stain, leak or "release" which was of Minor or Major nature. We also dispute that any release was improperly "characterized" or "covered". Strata's personnel determined that the release was below the reporting thresholds. The allegation of "covering" is not accurate as Strata personnel used nearby soil or sand to absorb and stabilize non-reportable amounts of liquid. This facility has undergone upgrade, repairs, and remediation many times. This site either has been or will be addressed in the near term during routine maintenance and clean up or, as a result of scheduled remedial, recompletion or plugging and abandonment operations on this well or area wells.</b> <b>Initial comments regarding pictures:</b> <b>Page 3, Pic 1-5 – Stained areas have been stabilized with absorbent material. Require additional NMOCD clarification.</b> <b>Page 3, Pic 6 – This is a "Skirted Tank." The "duct tape" type material has been used to cover a vent for the void under the tank frequented by wasps, bees and snakes which present a danger. Require additional NMOCD clarification.</b> <b>Page 4, Pic 1, 2, 3, 4 – Stain near wellhead noted. Require additional NMOCD clarification.</b> <b>Strata looks forward to additional clarification and discussion with NMOCD and remains committed to a prompt resolution of all legitimate concerns.</b>
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>Matt Murphy</u> Title: <u>Operations Manager</u>  Signature: <u>Matt Murphy</u> Date: <u>06/01/2021</u>  email: <u>matt@stratanm.com</u> Telephone: <u>720-468-3646</u>

## Oil Conservation Division

Incident ID	NAPP2116660414
District RP	
Facility ID	
Application ID	

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.

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: Shammy Dennis Title: Administrative Support

Signature: Shammy Dennis Date: 6/1/2021

email: sdennis@stratanm.com Telephone: 575-622-1127 ext. 13

**OCD Only**

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

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## 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

**NOTE: The above items (if required) will be provided after reclamation process is completed.**

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: Shammy Dennis Title: Administrative Support

Signature: Shammy Dennis Date: 6/1/2021

email: sdennis@stratanm.com Telephone: 575-622-1127 ext. 13

### OCD Only

Received by: Chad Hensley Date: 09/24/2021

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: Chad Hensley Date: 09/24/2021

Printed Name: Chad Hensley Title: Environmental Specialist Advanced



Pima Environmental Services

## **Appendix B**


Site Map



**Cuervo Federal #2**

(32.31065,-103.64864)

**Legend**

 Treated Area

Cuervo Fedral #2 (32.31065, -103.64864)



100 ft





Pima Environmental Services

## **Appendix C**

Photographic Documentation



**SITE PHOTOGRAPHS**  
**STRATA PRODUCTION COMPANY**  
**CUERVO FED #2**

**Pre-Treatment**



Crude oil tank with leak on manhole cover.



Release by heater treater covered with sand.



Release by heater treater, scraped top layer by previous slide to show extent of release.



Release by sales line.





Full view of tank battery.



Repair to crude oil tank with duct tape. Release by repair.



First minor scuffing just outside of guard rails of wellhead.



More extensive scuffing of top layer by well-head.





Further scraping to show depth of release.



Full view of wellhead. Scrapings show extent of release.

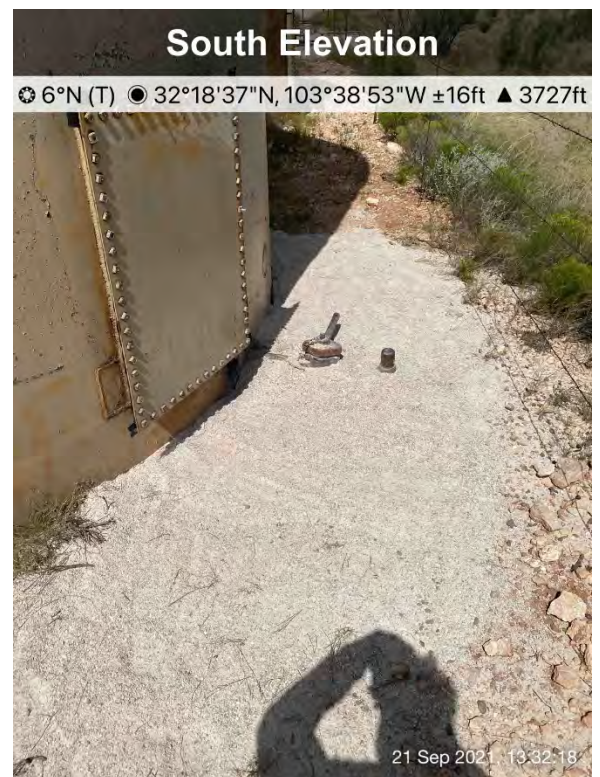
## Post Treatment



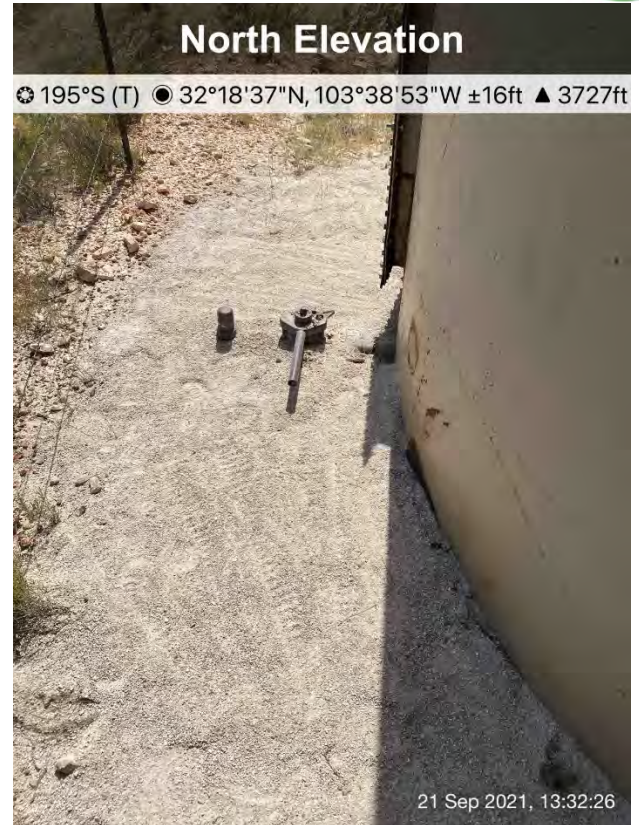
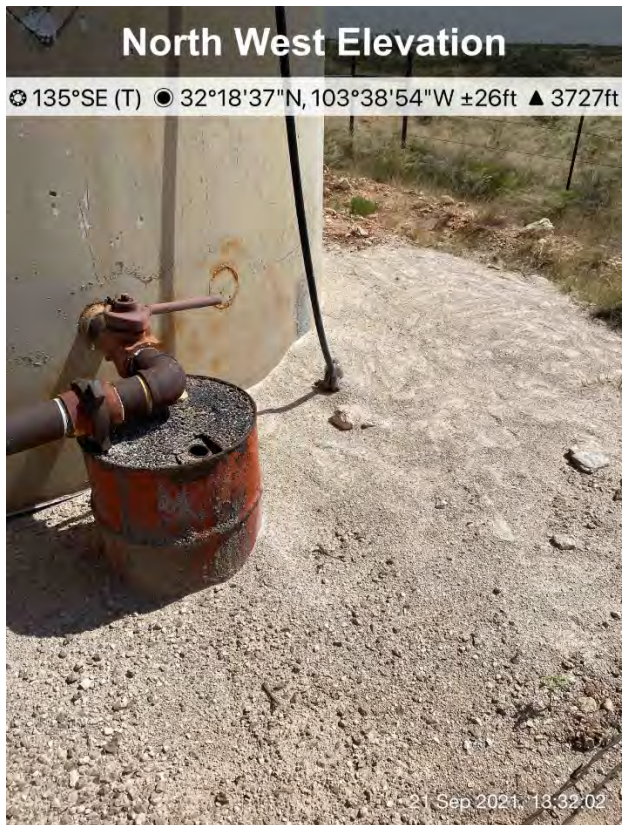














**District I**

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 51761

**CONDITIONS**

Operator: Pima Environmental Services, LLC 1601 N. Turner Hobbs, NM 88240	OGRID: 329999
	Action Number: 51761
	Action Type: [C-141] Release Corrective Action (C-141)

**CONDITIONS**

Created By	Condition	Condition Date
chensley	None	9/24/2021