

SITE REMEDIATION AND CLOSURE REPORT

NON-REPORTABLE RELEASE

Strata Production Company

Urraca Fed #3

GPS: Latitude 32.31734 Longitude -103.65185

Lea County, NM

Incident ID No. NAPP2116668297

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 Urraca Fed #3.

Site Coordinates: Latitude 32.31734 Longitude -103.65185

API #: 30-025-37687

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.

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

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

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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 32.31734 Longitude -103.65185
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Urraca Federal #3	Site Type:
Date Release Discovered:	API# (if applicable) 30-025-37687

Unit Letter	Section	Township	Range	County
L	11	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: 6/1/21 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. Initial comments regarding pictures: Page 10, Pics 1-3 – Areas of staining noted. Area stabilized. Require additional NMOCD clarification. Strata looks forward to additional clarification and discussion with NMOCD and remains committed to a prompt resolution of all legitimate concerns.
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>

OCD Only

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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: 11/09/2021

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: 11/09/2021

Printed Name: Chad Hensley Title: Environmental Specialist Advanced



Pima Environmental Services

Appendix B

Site Map

Urraca Federal #3

Legend

-  Treated Area
-  Urraca Fed #3 (32.31734, -103.65185)

 Urraca Fed #3 (32.31734, -103.65185)





Pima Environmental Services

Appendix C

Photographic Documentation



**SITE PHOTOGRAPHS
STRATA PRODUCTION COMPANY
URRACA FEDERAL #3**

Pre-Treatment



Staining outside of wellhead guard rail.



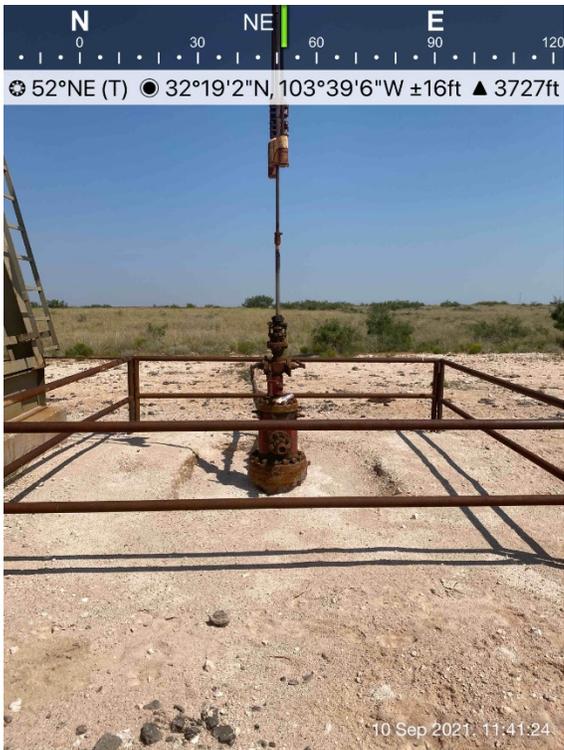
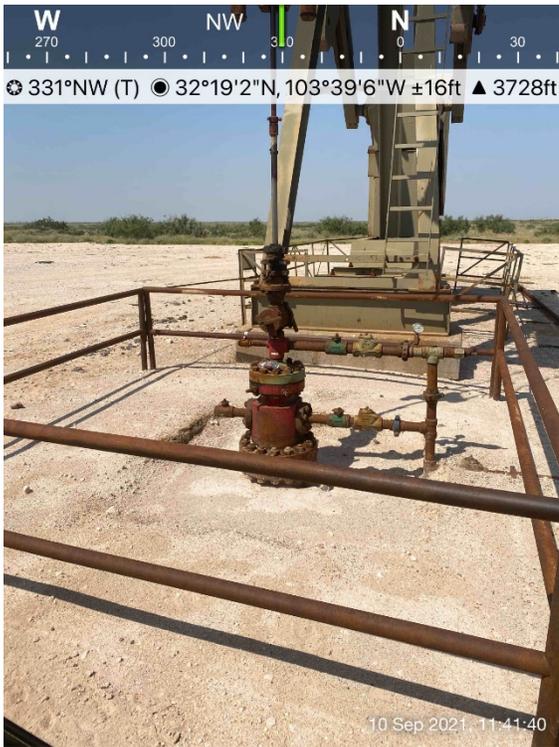
Staining outside of wellhead guard rail. Scraping of top layer.



Picture of wellhead. Signs of release seeping through top layer of soil.



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 59062

CONDITIONS

Operator: Pima Environmental Services, LLC 1601 N. Turner Hobbs, NM 88240	OGRID: 329999
	Action Number: 59062
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
chensley	None	11/9/2021