ENSOLUM

June 6, 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 Remediation Work Plan
Mesa B #2 SWD
Incident Number NOY1826826475
Lea County, New Mexico

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of BTA Oil Producers, LLC (BTA), has prepared the following *Revised Remediation Work Plan* (*Revised Work Plan*) as a follow up to the original *Remediation Work Plan* (*Work Plan*) dated October 18, 2018. This *Revised Work Plan* proposes to complete additional delineation activities at the Mesa B #2 Salt Water Disposal (SWD) facility (Site) in response to the November 9, 2018, correspondence from the New Mexico Oil Conservation Division (NMOCD) indicating that delineation of the release was incomplete. The following *Revised Work Plan* proposes full lateral and vertical delineation of the September 11, 2018, produced water release.

SITE DESCRIPTION AND RELEASE SUMMARY

The Site is located in Unit P, Section 7, Township 26 South, Range 33 East, in Lea County, New Mexico (32.05356°, -103.60563°) and is associated with oil and gas exploration and production operations on Private Land.

On September 11, 2018, internal corrosion in the pump vibration dampener caused the release of approximately 66 barrels (bbls) of produced water. The released fluids affected approximately 9,143 square feet of the well pad and flowed off-pad to the south along a dry drainage for approximately 300 feet. A vacuum truck was dispatched to the Site to recover free-standing fluids; approximately 30 bbls of produced water were recovered. BTA reported the release to the NMOCD on a Release Notification Form C-141 (Form C-141) on September 20, 2018 and October 1, 2018 (revised). The release was assigned Remediation Permit Number (RP) Number 1RP-5202 and Incident Number NOY1826826475.

SITE CHARACTERIZATION AND CLOSURE CRITERIA

The Site was characterized to assess the applicability of Table I, 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 estimated to be between 51 and 100 feet below ground surface (bgs) based on the nearest groundwater well data. The closest permitted groundwater well with depth to

groundwater data is New Mexico Office of the State Engineer (NMOSE) well C-04547, located at the Site. The well was drilled to a depth of 112 feet during July 2021 and groundwater was encountered at a depth of 89.5 feet bgs. Following determination of depth to groundwater, the well was plugged and abandoned pursuant to NMOSE standards. The referenced well records are included in Appendix A. All wells used for depth to groundwater determination are depicted on Figure 1.

The closest continuously flowing or significant watercourse to the Site is a dry wash, located approximately 635 feet east of the Site. The Site is greater than 200 feet from a lakebed, sinkhole, or playa lake and greater than 300 feet from an occupied residence, school, hospital, institution, church, or wetland. The Site is greater than 1,000 feet to a freshwater well or spring and is not within a 100-year floodplain or overlying a subsurface mine. The Site is not underlain by unstable geology (medium potential karst designation area). Site receptors are identified on Figure 1.

Based on the results of the Site Characterization, the following NMOCD Table I Closure Criteria (Closure Criteria) apply:

- Benzene: 10 milligrams per kilogram (mg/kg)
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg
- Total petroleum hydrocarbons (TPH)-gasoline range organics (GRO) and TPH-diesel range organics (DRO): 1,000 mg/kg
- TPH: 2,500 mg/kg
- Chloride: 10,000 mg/kg

A reclamation requirement of 600 mg/kg chloride and 100 mg/kg TPH applies to the top 4 feet of the pasture area that was impacted by the release, per NMAC 19.15.29.13.D (1) for the top 4 feet of areas that will be reclaimed following remediation.

BACKGROUND

On September 25, 2018, soil sampling activities were conducted at the Site to assess the impacted soil resulting from the September 11, 2018, produced water release onto the well pad and along a dry drainage south of the well pad. Soil samples were collected within the release extent at depths ranging from the ground surface to 1-foot bgs and were submitted for laboratory analysis of chloride. The release extent and soil sample locations are presented on the attached Figure 2. The soil sample laboratory analytical results are summarized in the attached Table 1. A *Work Plan* was submitted to NMOCD on October 18, 2018, proposing to excavate the release extent in 6-inch to 1-foot intervals until confirmation samples indicated that the impacted soil had been removed or to a maximum of 4 feet bgs. If soil impacts exceeded 4 feet bgs, a 20 mil impermeable liner would be installed in the base of the 4-foot excavation prior to backfilling. Additional details can be referenced in the original *Work Plan,* submitted to NMOCD on October 18, 2018.

On November 9, 2018, NMOCD reviewed the *Work Plan* for Incident Number NOY1826826475 and made the following comments via email:

- *In order to facilitate assessments of reports, maps submitted must have north arrow and scale.*
- *Please be advised that utilization of liners now necessitates a variance submission that must include justification and/or demonstrations that the proposed variance will afford reasonable protection against contamination of fresh water, human health and the environment.*
- *The delineation submitted for 1RP-5202 is incomplete. Due to the status of this site being high priority and the significant lateral extent of this spill, NMOCD strongly requests completion of delineation before commencing remediation.*

PROPOSED REMEDIATION WORKPLAN

Upon review of the October 18, 2018, *Work Plan* and NMOCD correspondence regarding Incident Number NOY1826826475, it was unclear if the excavation activities were completed as outlined in the *Work Plan* or if additional delineation was completed per the NMOCD November 9, 2018, correspondence. As such, BTA requests approval to complete the following remediation activities:

- Complete Site assessment activities within and around the documented release extent to assess for the presence or absence of impacted soil resulting from the September 11, 2018, produced water release.
    - Soil samples will be collected outside of the historical release extent from a depth of 0.5 feet bgs to confirm the lateral extent of the surface release.
    - Boreholes will be advanced via hand auger within the historical release extent to assess the vertical extent of impacted soil or determine if remediation activities were previously completed as proposed in the October 18, 2018, *Work Plan.*
    - The proposed borehole and soil sample locations are shown on the attached Figure 3. Borehole locations may need to be adjusted slightly during field activities based on the location of underground utilities.
    - Soil from the boreholes will be field screened at 1-foot intervals for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID) and chloride using Hach® chloride QuanTab® test strips. Field screening results and observations will be logged on lithologic/soil sampling logs. Two delineation samples from each borehole will be submitted for laboratory analysis; the sample with the highest field screening result and the sample from the final borehole depth.
        - Final depth of the boreholes will be determined by field screening results indicating compliance with the Site Closure Criteria in the on-pad release extent and the reclamation requirement for the top four feet of the off-pad release extent. In the absence of elevated field screening results, the boreholes will be advanced to a depth of 4 feet bgs.
    - The soil samples will be analyzed for BTEX following United States Environmental Protection Agency (EPA) Method 8021B; TPH-GRO, TPH-DRO, and TPH-oil range organics (ORO) following EPA Method 8015M/D; and chloride following EPA Method 300.0.
- Upon completion of the lateral and vertical delineation activities and review of the laboratory analytical results, BTA will prepare a follow-up *Remediation Work Plan* proposing additional remediation activities, if warranted, or a *Closure Request* if no impacted soil is identified.

BTA will complete the delineation activities within 90 days of the date of approval of this *Revised Work Plan* by the NMOCD. BTA believes the scope of work described above meets the requirements set forth in 19.15.29.13 NMAC and is protective of human health, the environment, and groundwater. As such, BTA respectfully requests approval of this *Revised Work Plan* for Incident Number NOY1826826475.

If you have any questions or comments, please contact Ms. Tacoma Morrissey at (337) 257-8307 or tmorrissey@ensolum.com.

Sincerely,
Ensolum, LLC

Aimee Cole
Senior Managing Scientist

Ashley Ager, M.S., PG
Principal

cc: Bob Hall, BTA Oil Producers, LLC
Bureau of Land Management

Appendices:

Figure 1	Site Location Map (2023)
Figure 2	Release Extent and Delineation Soil Sample Locations (2018)
Figure 3	Proposed Delineation Soil Sample Locations (2023)
Table 1	Soil Sample Analytical Results (2018)
Appendix A	Referenced Well Records
Appendix B	Laboratory Analytical Reports & Chain-of-Custody Documentation (2018)
Appendix C	Final C-141

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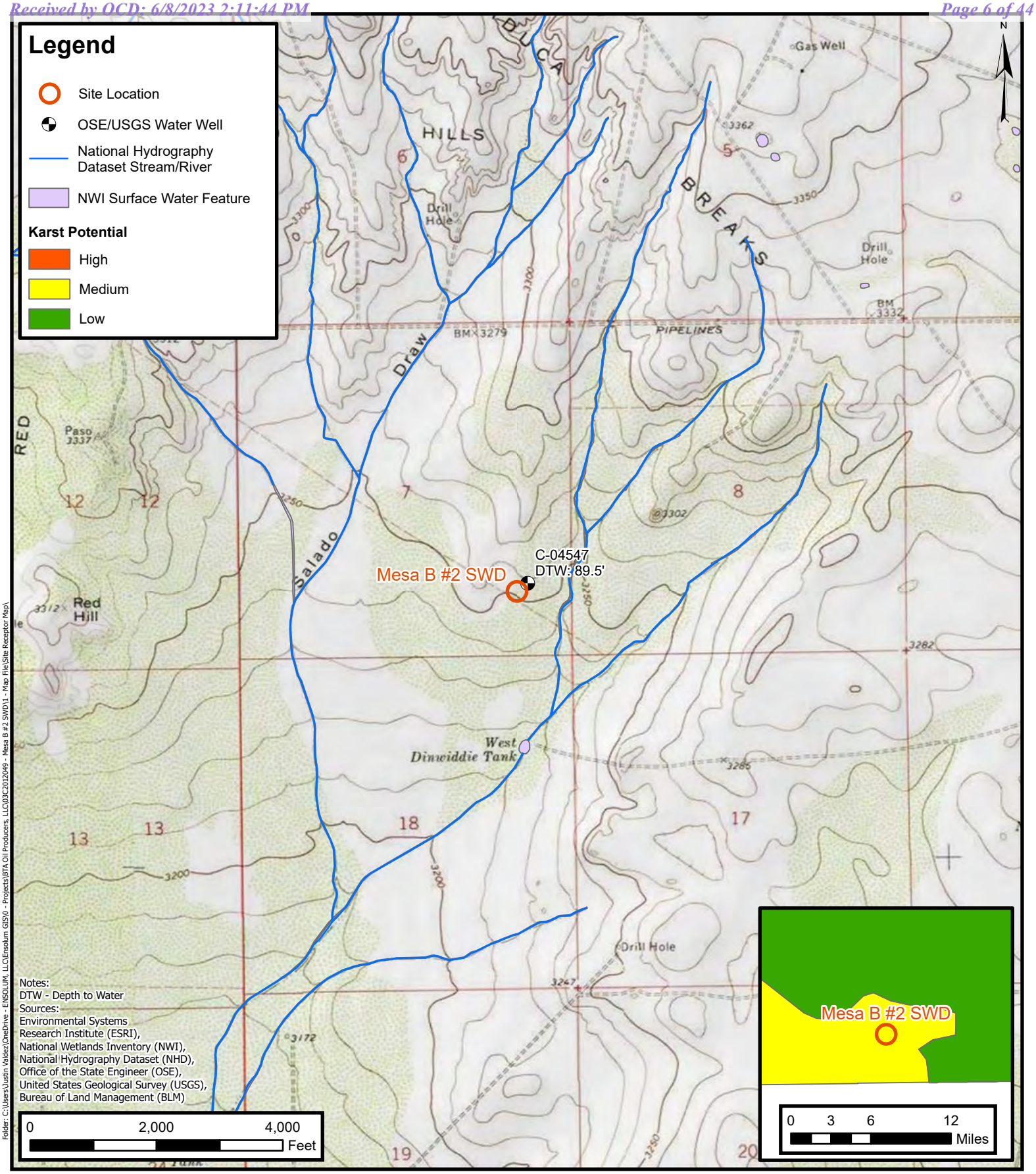
FIGURES



Folder: C:\Users\Justin Valdez\OneDrive - ENSOLUM, LLC\Ensolum GIS\0 - Projects\BTA Oil Producers, LLC\03C2012049 - Mesa B #2 SWD\1 - Map File\Site Receptor Map\

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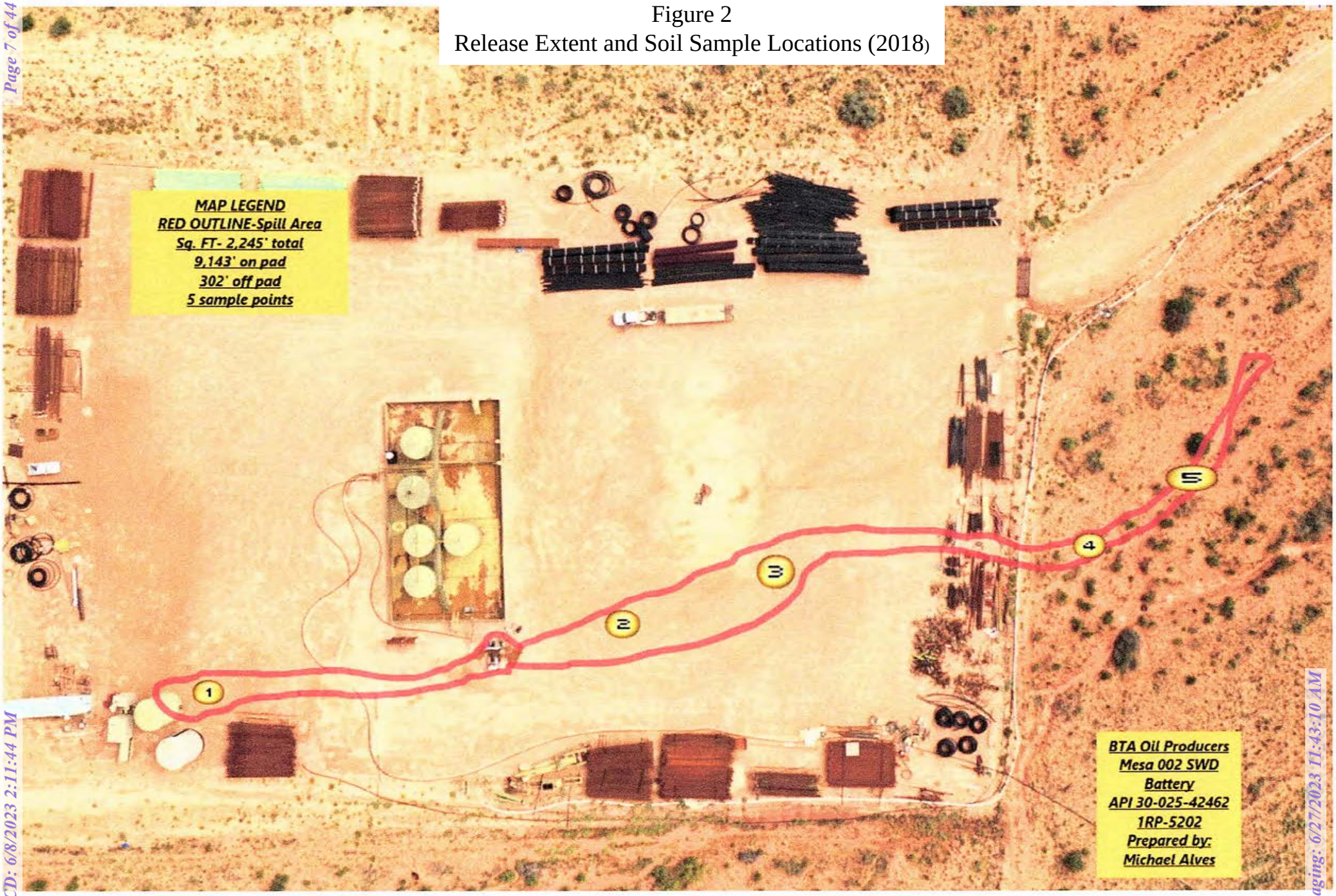
Environmental, Engineering and Hydrogeologic Consultants

Site Receptor Map

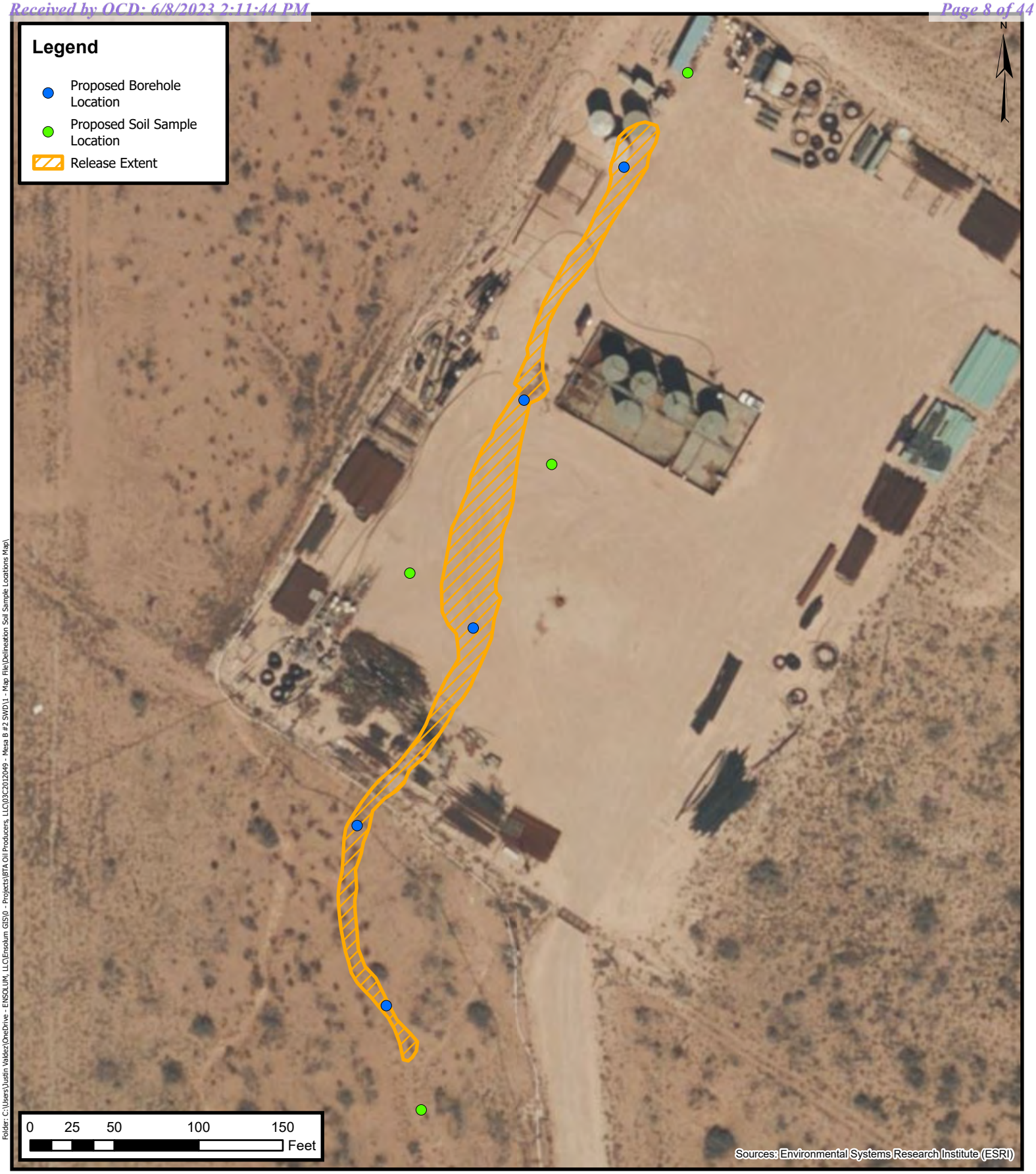
BTA Oil Producers, LLC
Mesa B #2 SWD
Incident Number: NOY1826826475
Unit P, Section 7, Township 26 South, Range 33 East
Lea County, New Mexico

FIGURE 1

Figure 2
Release Extent and Soil Sample Locations (2018)



Received by OCD: 6/8/2023 2:11:44 PM
Released to Imaging: 6/27/2023 11:43:10 AM



Folder: C:\Users\Justin Valdez\OneDrive - ENSOLUM, LLC\Ensolum GIS\0 - Projects\BTA Oil Producers, LLC\03C2012049 - Mesa B #2 SWD\1 - Map File\Delineation Soil Sample Locations Map\

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Environmental, Engineering and Hydrogeologic Consultants

Proposed Delineation Soil Sample Locations

BTA Oil Producers, LLC
Mesa B #2 SWD
Incident Number: NOY1826826475
Unit P, Section 7, Township 26 South, Range 33 East
Lea County, New Mexico

FIGURE 3

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TABLES

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TABLE 1
SOIL SAMPLE ANALYTICAL RESULTS (2018)
Mesa B #2 SWD
BTA Oil Producers, LLC
Lea County, New Mexico

Sample I.D.	Sample Date	Sample Depth (feet bgs)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)	TPH ORO (mg/kg)	GRO+DRO (mg/kg)	Total TPH (mg/kg)	Chloride (mg/kg)
NMOCD Table 1 Closure Criteria (NMAC 19.15.29)			10	50	NE	NE	NE	1,000	2,500	10,000
Asessment Soil Samples										
#1	09/25/2018	0.0	NA	NA	NA	NA	NA	NA	NA	1,150
#1	09/25/2018	0.5	NA	NA	NA	NA	NA	NA	NA	5,310
#2	09/25/2018	0.0	NA	NA	NA	NA	NA	NA	NA	4,630
#2	09/25/2018	0.5	NA	NA	NA	NA	NA	NA	NA	4,420
#3	09/25/2018	0.0	NA	NA	NA	NA	NA	NA	NA	**20,400**
#3	09/25/2018	0.5	NA	NA	NA	NA	NA	NA	NA	4,050
#4	09/25/2018	0.0	NA	NA	NA	NA	NA	NA	NA	25.8*
#4	09/25/2018	1.0	NA	NA	NA	NA	NA	NA	NA	**728***
#5	09/25/2018	0.0	NA	NA	NA	NA	NA	NA	NA	51.6*
#5	09/25/2018	1.0	NA	NA	NA	NA	NA	NA	NA	**1,830***

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
NA: Not Analyzed
* Indicates soil sample was collected in an area to be reclaimed following remediation.

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APPENDIX A

Referenced Well Records

WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

www.ose.state.nm.us

OSE DIT AUG 2 2021 PM4:44

1. GENERAL AND WELL LOCATION

OSE POD NO. (WELL NO.)	WELL TAG ID NO.	OSE FILE NO(S).
POD1 (MW-1)	n/a	C-4547

WELL OWNER NAME(S)	PHONE (OPTIONAL)
BTA Oil Producers	

WELL OWNER MAILING ADDRESS	CITY	STATE	ZIP
104 S. Pecos St.	Midland	TX	79701

WELL LOCATION (FROM GPS)		DEGREES	MINUTES	SECONDS	
	LATITUDE	32	3	14.34	N
	LONGITUDE	103	36	16.96	W

* ACCURACY REQUIRED: ONE TENTH OF A SECOND
* DATUM REQUIRED: WGS 84

DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS – PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE

NE SE SE Sec. 07 T26S R33E

2. DRILLING & CASING INFORMATION

LICENSE NO.	NAME OF LICENSED DRILLER	NAME OF WELL DRILLING COMPANY
1249	Jackie D. Atkins	Atkins Engineering Associates, Inc.

DRILLING STARTED	DRILLING ENDED	DEPTH OF COMPLETED WELL (FT)	BORE HOLE DEPTH (FT)	DEPTH WATER FIRST ENCOUNTERED (FT)
07/15/2021	07/15/2021	temporary well material	112	unknown

COMPLETED WELL IS: ☐ ARTESIAN ☐ DRY HOLE ☑ SHALLOW (UNCONFINED)

STATIC WATER LEVEL IN COMPLETED WELL (FT): 89.5

DRILLING FLUID: ☑ AIR ☐ MUD ADDITIVES – SPECIFY:

DRILLING METHOD: ☐ ROTARY ☐ HAMMER ☐ CABLE TOOL ☑ OTHER – SPECIFY: Hollow Stem Auger

DEPTH (feet bgl) FROM	DEPTH (feet bgl) TO	BORE HOLE DIAM (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)	CASING CONNECTION TYPE (add coupling diameter)	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)	SLOT SIZE (inches)
0	21	±8.5	Boring- HSA	--	--	--	--
21	112	±3.5	Boring- Air Rotary	--	--	--	--

3. ANNULAR MATERIAL

DEPTH (feet bgl) FROM	DEPTH (feet bgl) TO	BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL	AMOUNT (cubic feet)	METHOD OF PLACEMENT

FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 06/30/17)

FILE NO. C-4547	POD NO. 1	TRN NO. 698291	
LOCATION 26S-33E-07 4-4-2		WELL TAG ID NO. NA	PAGE 1 OF 2

OSE DIT AUG 2 2021 PM4:44

4. HYDROGEOLOGIC LOG OF WELL

DEPTH (feet bgl) FROM	DEPTH (feet bgl) TO	THICKNESS (feet)	COLOR AND TYPE OF MATERIAL ENCOUNTERED - INCLUDE WATER-BEARING CAVITIES OR FRACTURE ZONES (attach supplemental sheets to fully describe all units)	WATER BEARING? (YES / NO)	ESTIMATED YIELD FOR WATER-BEARING ZONES (gpm)
0	4	4	Caliche, Consolidated , White	Y ✓N	
4	44	40	Sand, Fine-grained, poorly graded, with caliche gravel, Redish Brown	Y ✓N	
44	51	7	Clay, Stiff, Dark Brown,	Y ✓N	
51	103	52	Sandstone, Fine-grained, poorly graded, Tan Brown	✓Y N	
				Y N	
				Y N	
				Y N	
				Y N	
				Y N	
				Y N	
				Y N	
				Y N	
				Y N	
				Y N	
				Y N	
				Y N	
				Y N	
				Y N	
				Y N	
				Y N	

METHOD USED TO ESTIMATE YIELD OF WATER-BEARING STRATA:

☐ PUMP ☐ AIR LIFT ☐ BAILER ☐ OTHER – SPECIFY:

TOTAL ESTIMATED WELL YIELD (gpm): 0.00

5. TEST; RIG SUPERVISION

WELL TEST: TEST RESULTS - ATTACH A COPY OF DATA COLLECTED DURING WELL TESTING, INCLUDING DISCHARGE METHOD, START TIME, END TIME, AND A TABLE SHOWING DISCHARGE AND DRAWDOWN OVER THE TESTING PERIOD.

MISCELLANEOUS INFORMATION: Temporary well materials removed and the soil boring plugged using tremie pipe to total depth and landed cement slurry of <6.0 gallons of water per 94 lbs sack of Portland TYPE I/II Neat Cement. See attached Plugging Record

PRINT NAME(S) OF DRILL RIG SUPERVISOR(S) THAT PROVIDED ONSITE SUPERVISION OF WELL CONSTRUCTION OTHER THAN LICENSEE:

Shane Eldridge, Cameron Pruitt, Carmelo Trevino

6. SIGNATURE

THE UNDERSIGNED HEREBY CERTIFIES THAT, TO THE BEST OF HIS OR HER KNOWLEDGE AND BELIEF, THE FOREGOING IS A TRUE AND CORRECT RECORD OF THE ABOVE DESCRIBED HOLE AND THAT HE OR SHE WILL FILE THIS WELL RECORD WITH THE STATE ENGINEER AND THE PERMIT HOLDER WITHIN 30 DAYS AFTER COMPLETION OF WELL DRILLING:

Jack Atkins — Jackie D. Atkins — 07/29/2021

SIGNATURE OF DRILLER / PRINT SIGNEE NAME — DATE

FOR OSE INTERNAL USE — WR-20 WELL RECORD & LOG (Version 06/30/2017)

FILE NO. C-4547	POD NO. 1	TRN NO.	
LOCATION 26S-33E-07 4.4.2		WELL TAG ID NO. NA	PAGE 2 OF 2

2021-07-28_C-4547_POD1_OSE_Well Record and Log_mesa1-for sign

Final Audit Report 2021-07-29

Created:	2021-07-29
By:	Lucas Middleton (lucas@atkinseng.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA3aQOFUKeCXoHbozKpK1XeoMdI53lwclm

OSE DIT AUG 2 2021 PM4:44

"2021-07-28_C-4547_POD1_OSE_Well Record and Log_mesa1-for sign" History

Document created by Lucas Middleton (lucas@atkinseng.com)
2021-07-29 - 8:40:54 PM GMT- IP address: 69.21.248.123

Document emailed to Jack Atkins (jack@atkinseng.com) for signature
2021-07-29 - 8:41:43 PM GMT

Email viewed by Jack Atkins (jack@atkinseng.com)
2021-07-29 - 8:43:29 PM GMT- IP address: 64.90.153.232

Document e-signed by Jack Atkins (jack@atkinseng.com)
Signature Date: 2021-07-29 - 8:44:00 PM GMT - Time Source: server- IP address: 64.90.153.232

Agreement completed.
2021-07-29 - 8:44:00 PM GMT

Adobe Sign

National Water Information System: Web Interface

USGS Water Resources

Data Category: Groundwater | Geographic Area: United States | GO

Click to hideNews 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

site_no list =

- 320245103335901

Minimum number of levels = 1

Save file of selected sites to local disk for future upload

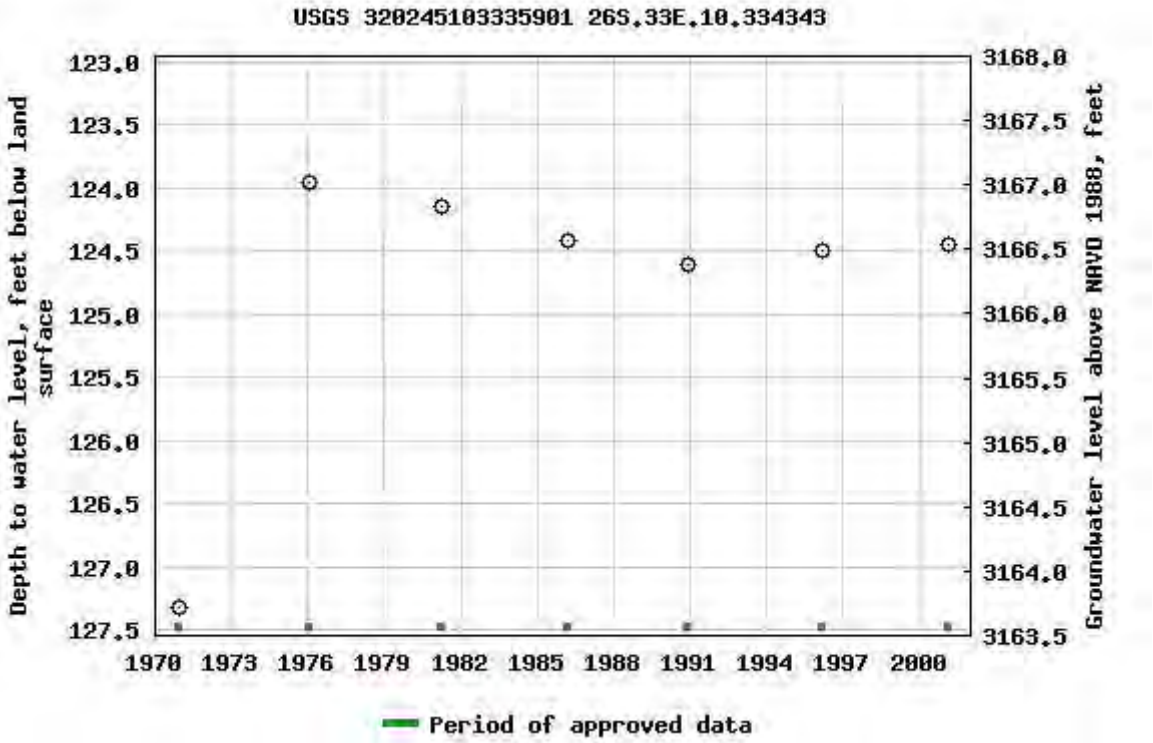
USGS 320245103335901 26S.33E.10.334343

Available data for this site | Groundwater: Field measurements | GO

Lea County, New Mexico
Hydrologic Unit Code 13070001
Latitude 32°02'45", Longitude 103°33'59" NAD27
Land-surface elevation 3,291 feet above NAVD88
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
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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: 2023-05-25 14:49:55 EDT
0.59 0.49 nadww02

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APPENDIX B

Laboratory Analytical Reports & Chain of Custody Documentation

Analytical Report 600280

for

BTA Oil Producers, LLC .3

Project Manager: John Allen

Mesa B 2 SWD

01-OCT-18

Collected By: Client

1211 W. Florida Ave, Midland TX 79701

Xenco-Houston (EPA Lab Code: TX00122):
Texas (T104704215-18-27), Arizona (AZ0765), Florida (E871002-24), Louisiana (03054)
Oklahoma (2017-142)

Xenco-Dallas (EPA Lab Code: TX01468):
Texas (T104704295-18-17), Arizona (AZ0809), Arkansas (17-063-0)

Xenco-El Paso (EPA Lab Code: TX00127): Texas (T104704221-18-13)
Xenco-Lubbock (EPA Lab Code: TX00139): Texas (T104704219-18-17)
Xenco-Midland (EPA Lab Code: TX00158): Texas (T104704400-18-16)
Xenco-San Antonio (EPA Lab Code: TNI02385): Texas (T104704534-18-4)
Xenco Phoenix (EPA Lab Code: AZ00901): Arizona (AZ0757)
Xenco-Phoenix Mobile (EPA Lab Code: AZ00901): Arizona (AZM757)
Xenco-Atlanta (LELAP Lab ID #04176)
Xenco-Tampa: Florida (E87429)
Xenco-Lakeland: Florida (E84098)

01-OCT-18

Project Manager: **John Allen**
BTA Oil Producers, LLC .3
104 S. Pecos St.
Midland, TX 79701

Reference: XENCO Report No(s): **600280**
Mesa B 2 SWD
Project Address:

John Allen:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number(s) 600280. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. The uncertainty of measurement associated with the results of analysis reported is available upon request. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 600280 will be filed for 45 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

Kelsey Brooks
Project Manager

Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.
Certified and approved by numerous States and Agencies.
A Small Business and Minority Status Company that delivers SERVICE and QUALITY

Houston - Dallas - Midland - San Antonio - Phoenix - Oklahoma - Latin America

Sample Cross Reference 600280

BTA Oil Producers, LLC .3, Midland, TX

Mesa B 2 SWD

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
#1 0"	S	09-25-18 16:00	0	600280-001
#1 6"	S	09-25-18 16:00	6 In	600280-002
#2 0"	S	09-25-18 16:00	0	600280-003
#2 6"	S	09-25-18 16:00	6 In	600280-004
#3 0"	S	09-25-18 16:00	0	600280-005
#3 6"	S	09-25-18 16:00	6 In	600280-006
#4 0"	S	09-25-18 16:00	0	600280-007
#4 1'	S	09-25-18 16:00	12 In	600280-008
#5 0"	S	09-25-18 16:00	0	600280-009
#5 1'	S	09-25-18 16:00	12 In	600280-010

Project ID:
Work Order Number(s): *600280*

Report Date: *01-OCT-18*
Date Received: *09/26/2018*

Sample receipt non conformances and comments:

None

Sample receipt non conformances and comments per sample:

None

Analytical non conformances and comments:

Batch: LBA-3064711 Inorganic Anions by EPA 300
Lab Sample ID 600476-001 was randomly selected for Matrix Spike/Matrix Spike Duplicate (MS/MSD). Chloride recovered below QC limits in the Matrix Spike and Matrix Spike Duplicate. Outlier/s are due to possible matrix interference. Samples in the analytical batch are: 600280-001, -002, -003, -004, -005, -006, -007, -008, -009, -010.
The Laboratory Control Sample for Chloride is within laboratory Control Limits, therefore the data was accepted.

CASE NARRATIVE

Client Name: BTA Oil Producers, LLC .3

Certificate of Analytical Results 600280

BTA Oil Producers, LLC .3, Midland, TX

Mesa B 2 SWD

Sample Id:	**#1 0"**	Matrix:	Soil	Date Received:	09.26.18 10.15
Lab Sample Id:	600280-001	Date Collected:	09.25.18 16.00	Sample Depth:	0
Analytical Method:	Chloride by EPA 300			Prep Method:	E300P
Tech:	SCM			% Moisture:	
Analyst:	CHE	Date Prep:	09.27.18 14.00	Basis:	Wet Weight
Seq Number:	3064711				

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	**1150**	5.03	mg/kg	09.27.18 14.36		1

Certificate of Analytical Results 600280

BTA Oil Producers, LLC .3, Midland, TX

Mesa B 2 SWD

Sample Id:	**#1 6"**	Matrix:	Soil	Date Received:	09.26.18 10.15
Lab Sample Id:	600280-002	Date Collected:	09.25.18 16.00	Sample Depth:	6 In
Analytical Method:	Chloride by EPA 300			Prep Method:	E300P
Tech:	SCM			% Moisture:	
Analyst:	CHE	Date Prep:	09.27.18 14.00	Basis:	Wet Weight
Seq Number:	3064711				

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	**5310**	49.8	mg/kg	09.27.18 15.03		10

XENCO LABORATORIES

Certificate of Analytical Results 600280

BTA Oil Producers, LLC .3, Midland, TX

Mesa B 2 SWD

Sample Id:	**#2 0"**	Matrix:	Soil	Date Received:	09.26.18 10.15
Lab Sample Id:	600280-003	Date Collected:	09.25.18 16.00	Sample Depth:	0
Analytical Method:	Chloride by EPA 300			Prep Method:	E300P
Tech:	SCM			% Moisture:	
Analyst:	CHE	Date Prep:	09.27.18 14.00	Basis:	Wet Weight
Seq Number:	3064711				

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	**4630**	49.6	mg/kg	09.27.18 15.08		10

Certificate of Analytical Results 600280

BTA Oil Producers, LLC .3, Midland, TX

Mesa B 2 SWD

Sample Id:	**#2 6"**	Matrix:	Soil	Date Received:	09.26.18 10.15
Lab Sample Id:	600280-004	Date Collected:	09.25.18 16.00	Sample Depth:	6 In
Analytical Method:	Chloride by EPA 300			Prep Method:	E300P
Tech:	SCM			% Moisture:	
Analyst:	CHE	Date Prep:	09.27.18 14.00	Basis:	Wet Weight
Seq Number:	3064711				

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	**4420**	49.5	mg/kg	09.27.18 15.14		10

Certificate of Analytical Results 600280

BTA Oil Producers, LLC .3, Midland, TX

Mesa B 2 SWD

Sample Id:	**#3 0"**	Matrix:	Soil	Date Received:	09.26.18 10.15
Lab Sample Id:	600280-005	Date Collected:	09.25.18 16.00	Sample Depth:	0
Analytical Method:	Chloride by EPA 300			Prep Method:	E300P
Tech:	SCM			% Moisture:	
Analyst:	CHE	Date Prep:	09.27.18 14.00	Basis:	Wet Weight
Seq Number:	3064711				

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	**20400**	250	mg/kg	09.27.18 15.20		50

Certificate of Analytical Results 600280

BTA Oil Producers, LLC .3, Midland, TX

Mesa B 2 SWD

Sample Id:	**#3 6"**	Matrix:	Soil	Date Received:	09.26.18 10.15
Lab Sample Id:	600280-006	Date Collected:	09.25.18 16.00	Sample Depth:	6 In
Analytical Method:	Chloride by EPA 300			Prep Method:	E300P
Tech:	SCM			% Moisture:	
Analyst:	CHE	Date Prep:	09.27.18 14.00	Basis:	Wet Weight
Seq Number:	3064711				

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	**4050**	49.8	mg/kg	09.27.18 15.37		10

Certificate of Analytical Results 600280

BTA Oil Producers, LLC .3, Midland, TX

Mesa B 2 SWD

Sample Id:	**#4 0"**	Matrix:	Soil	Date Received:	09.26.18 10.15
Lab Sample Id:	600280-007	Date Collected:	09.25.18 16.00	Sample Depth:	0
Analytical Method:	Chloride by EPA 300			Prep Method:	E300P
Tech:	SCM			% Moisture:	
Analyst:	CHE	Date Prep:	09.27.18 14.00	Basis:	Wet Weight
Seq Number:	3064711				

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	**25.8**	5.00	mg/kg	09.27.18 15.42		1

Certificate of Analytical Results 600280

BTA Oil Producers, LLC .3, Midland, TX

Mesa B 2 SWD

Sample Id:	#4 1'	Matrix:	Soil	Date Received:	09.26.18 10.15
Lab Sample Id:	600280-008	Date Collected:	09.25.18 16.00	Sample Depth:	12 In
Analytical Method:	Chloride by EPA 300			Prep Method:	E300P
Tech:	SCM			% Moisture:	
Analyst:	CHE	Date Prep:	09.27.18 14.00	Basis:	Wet Weight
Seq Number:	3064711				

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	**728**	4.97	mg/kg	09.27.18 15.48		1

Certificate of Analytical Results 600280

BTA Oil Producers, LLC .3, Midland, TX

Mesa B 2 SWD

Sample Id:	**#5 0"**	Matrix:	Soil	Date Received:	09.26.18 10.15
Lab Sample Id:	600280-009	Date Collected:	09.25.18 16.00	Sample Depth:	0
Analytical Method:	Chloride by EPA 300			Prep Method:	E300P
Tech:	SCM			% Moisture:	
Analyst:	CHE	Date Prep:	09.27.18 14.00	Basis:	Wet Weight
Seq Number:	3064711				

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	**51.6**	5.02	mg/kg	09.27.18 15.54		1

Certificate of Analytical Results 600280

BTA Oil Producers, LLC .3, Midland, TX

Mesa B 2 SWD

Sample Id:	**#5 1'**	Matrix:	Soil	Date Received:	09.26.18 10.15
Lab Sample Id:	600280-010	Date Collected:	09.25.18 16.00	Sample Depth:	12 In
Analytical Method:	Chloride by EPA 300			Prep Method:	E300P
Tech:	SCM			% Moisture:	
Analyst:	CHE	Date Prep:	09.27.18 14.00	Basis:	Wet Weight
Seq Number:	3064711				

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	**1830**	25.2	mg/kg	09.27.18 15.59		5

Flagging Criteria

X In our quality control review of the data a QC deficiency was observed and flagged as noted. MS/MSD recoveries were found to be outside of the laboratory control limits due to possible matrix /chemical interference, or a concentration of target analyte high enough to affect the recovery of the spike concentration. This condition could also affect the relative percent difference in the MS/MSD.

B A target analyte or common laboratory contaminant was identified in the method blank. Its presence indicates possible field or laboratory contamination.

D The sample(s) were diluted due to targets detected over the highest point of the calibration curve, or due to matrix interference. Dilution factors are included in the final results. The result is from a diluted sample.

E The data exceeds the upper calibration limit; therefore, the concentration is reported as estimated.

F RPD exceeded lab control limits.

J The target analyte was positively identified below the quantitation limit and above the detection limit.

U Analyte was not detected.

L The LCS data for this analytical batch was reported below the laboratory control limits for this analyte. The department supervisor and QA Director reviewed data. The samples were either reanalyzed or flagged as estimated concentrations.

H The LCS data for this analytical batch was reported above the laboratory control limits. Supporting QC Data were reviewed by the Department Supervisor and QA Director. Data were determined to be valid for reporting.

K Sample analyzed outside of recommended hold time.

JN A combination of the "N" and the "J" qualifier. The analysis indicates that the analyte is "tentatively identified" and the associated numerical value may not be consistent with the amount actually present in the environmental sample.

** Surrogate recovered outside laboratory control limit.

BRL Below Reporting Limit.

RL Reporting Limit

MDL Method Detection Limit **SDL** Sample Detection Limit **LOD** Limit of Detection

PQL Practical Quantitation Limit **MQL** Method Quantitation Limit **LOQ** Limit of Quantitation

DL Method Detection Limit

NC Non-Calculable

SMP Client Sample **BLK** Method Blank

BKS/LCS Blank Spike/Laboratory Control Sample **BKSD/LCSD** Blank Spike Duplicate/Laboratory Control Sample Duplicate

MD/SD Method Duplicate/Sample Duplicate **MS** Matrix Spike **MSD:** Matrix Spike Duplicate

+ NELAC certification not offered for this compound.

* (Next to analyte name or method description) = Outside XENCO's scope of NELAC accreditation

QC Summary 600280

BTA Oil Producers, LLC .3

Mesa B 2 SWD

Analytical Method: Chloride by EPA 300 — Prep Method: E300P
Seq Number: 3064711 — Matrix: Solid — Date Prep: 09.27.18
MB Sample Id: 7663113-1-BLK — LCS Sample Id: 7663113-1-BKS — LCSD Sample Id: 7663113-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	<5.00	250	247	99	246	98	90-110	0	20	mg/kg	09.27.18 14:24	

Analytical Method: Chloride by EPA 300 — Prep Method: E300P
Seq Number: 3064711 — Matrix: Soil — Date Prep: 09.27.18
Parent Sample Id: 600280-001 — MS Sample Id: 600280-001 S — MSD Sample Id: 600280-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	1150	252	1370	87	1370	87	90-110	0	20	mg/kg	09.27.18 14:41	X

Analytical Method: Chloride by EPA 300 — Prep Method: E300P
Seq Number: 3064711 — Matrix: Soil — Date Prep: 09.27.18
Parent Sample Id: 600476-001 — MS Sample Id: 600476-001 S — MSD Sample Id: 600476-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	836	250	1060	90	1070	94	90-110	1	20	mg/kg	09.27.18 16:11	

MS/MSD Percent Recovery
Relative Percent Difference
LCS/LCSD Recovery
Log Difference

[D] = 100*(C-A) / B
RPD = 200* | (C-E) / (C+E) |
[D] = 100 * (C) / [B]
Log Diff. = Log(Sample Duplicate) - Log(Original Sample)

LCS = Laboratory Control Sample
A = Parent Result
C = MS/LCS Result
E = MSD/LCSD Result

MS = Matrix Spike
B = Spike Added
D = MSD/LCSD % Rec

Final 1.000

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Chain of Custody

Work Order No: 600780

Houston,TX (281) 240-4200 Dallas,TX (214) 902-0300 San Antonio,TX (210) 509-3334
Midland,TX (432-704-5440) EL Paso,TX (915)585-3443 Lubbock,TX (806)794-1296
Hobbs,NM (575-392-7550) Phoenix,AZ (480-355-0900) Atlanta,GA (770-449-8800) Tampa,FL (813-620-2000)
www.xenco.com Page _____ of _____

Project Manager:	John Allen	Bill to: (if different)	
Company Name:	BTA	Company Name:	
Address:	104 S. Pecos	Address:	
City, State ZIP:	Midland TX 79707	City, State ZIP:	
Phone:	432-701-5808 Email:		jallen@BTAoil.com

Work Order Comments

Program: UST/PST ☐ PRP ☐ Brownfields ☐ RRC ☐ Superfund ☐
State of Project:
Reporting: Level II ☐ Level III ☐ PST/UST ☐ TRRP ☐ Level IV ☐
Deliverables: EDD ☐ ADaPT ☐ Other:

Project Name:	Mesa B 2 SWD	Turn Around	
Project Number:		Routine ☑	
P.O. Number:		Rush:	
Sampler's Name:	John Allen	Due Date:	

SAMPLE RECEIPT			
Temp Blank:	Yes (No)	Wet Ice:	(Yes) No
Temperature (°C):	3.7	Thermometer ID:	168
Received Intact:	(Yes) No		
Cooler Custody Seals:	Yes (No) N/A	Correction Factor:	0.0
Sample Custody Seals:	Yes (No) N/A	Total Containers:	

Sample Identification	Matrix	Date Sampled	Time Sampled	Depth	Number of Containers	Chlorides
#1 0"	Soil	9/25	4:00PM	0	1	X
#1 6"				6"	1	X
#2 0"				0	1	X
#2 6"				6"	1	X
#3 0"				0	1	X
#3 6"				6"	1	X
#4 0"				0	1	X
#4 ~~1'~~				12"	1	X
#5 0"				0	1	X
#5 1'				12"	1	X

ANALYSIS REQUEST

Work Order Notes

TAT starts the day recevied by the lab, if received by 4:30pm

Sample Comments

Total 200.7 / 6010 200.8 / 6020: 8RCRA 13PPM Texas 11 Al Sb As Ba Be B Cd Ca Cr Co Cu Fe Pb Mg Mn Mo Ni K Se Ag SiO2 Na Sr Tl Sn U V Zn
Circle Method(s) and Metal(s) to be analyzed **TCLP / SPLP 6010**: 8RCRA Sb As Ba Be Cd Cr Co Cu Pb Mn Mo Ni Se Ag Tl U **1631 / 245.1 / 7470 / 7471** : Hg

Notice: Signature of this document and relinquishment of samples constitutes a valid purchase order from client company to Xenco, its affiliates and subcontractors. It assigns standard terms and conditions of service. Xenco will be liable only for the cost of samples and shall not assume any responsibility for any losses or expenses incurred by the client if such losses are due to circumstances beyond the control of Xenco. A minimum charge of $75.00 will be applied to each project and a charge of $5 for each sample submitted to Xenco, but not analyzed. These terms will be enforced unless previously negotiated.

Relinquished by: (Signature)	Received by: (Signature)	Date/Time	Relinquished by: (Signature)	Received by: (Signature)	Date/Time
1		9/26/18 10:15	2		
3			4		
5			6		

Revised Date 051418 Rev. 2018.1

Final 1.000
Page 19 of 20
Received by OCD: 6/8/2023 2:11:44 PM
Released to Imaging: 6/27/2023 11:43:10 AM

XENCO Laboratories

Prelogin/Nonconformance Report- Sample Log-In

Client: BTA Oil Producers, LLC .3

Date/ Time Received: 09/26/2018 10:15:00 AM

Work Order #: 600280

Acceptable Temperature Range: 0 - 6 degC
Air and Metal samples Acceptable Range: Ambient

Temperature Measuring device used : R8

Sample Receipt Checklist	Comments
#1 *Temperature of cooler(s)?	3.5
#2 *Shipping container in good condition?	Yes
#3 *Samples received on ice?	Yes
#4 *Custody Seals intact on shipping container/ cooler?	N/A
#5 Custody Seals intact on sample bottles?	N/A
#6*Custody Seals Signed and dated?	N/A
#7 *Chain of Custody present?	Yes
#8 Any missing/extra samples?	No
#9 Chain of Custody signed when relinquished/ received?	Yes
#10 Chain of Custody agrees with sample labels/matrix?	Yes
#11 Container label(s) legible and intact?	Yes
#12 Samples in proper container/ bottle?	Yes
#13 Samples properly preserved?	Yes
#14 Sample container(s) intact?	Yes
#15 Sufficient sample amount for indicated test(s)?	Yes
#16 All samples received within hold time?	Yes
#17 Subcontract of sample(s)?	N/A
#18 Water VOC samples have zero headspace?	N/A

*** Must be completed for after-hours delivery of samples prior to placing in the refrigerator**

Analyst: PH Device/Lot#:

Checklist completed by: Brianna Teel Date: 09/26/2018

Brianna Teel

Checklist reviewed by: Kelsey Brooks Date: 09/27/2018

Kelsey Brooks

ENSOLUM

APPENDIX C

Final 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	NOY1826826475
District RP	1RP-5202
Facility ID	
Application ID	pOY1826825549

Release Notification

Responsible Party

Responsible Party BTA Oil Producers	OGRID 260297
Contact Name John Allen	Contact Telephone 432-701-5808
Contact email jallen@btaoil.com	Incident # NOY1826826475
Contact mailing address 104 S. Pecos St. Midland, TX 79701	

Location of Release Source

Latitude: 32.053884 Longitude: -103.605645
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Mesa B #2 SWD	Site Type: SWD Battery
Date Release Discovered: 9/11/18	API# *(if applicable)*: 30-025-42462

Unit Letter	Section	Township	Range	County
P	7	26S	33E	Lea

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☒ Private (*Name:* Charlotte W. Schuman Living Trust of October 5, 1988 Karlyn S. Doyle and Charlotte W. Schuman, Co-Trustees, 2121 Yorktown, #305, Tulsa, OK 74114, 918-747-7703)

Nature and Volume of Release

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

☐ Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
☒ Produced Water	Volume Released (bbls): Area of spill on pad (9,143 ft^2)* Average depth of spill (0.25 ft) * Soil porosity (0.15) + Length of spill off pad (302 ft) * Average width of spill off pad (0.6 ft) * Depth of spill off pad (1 ft) * Soil porosity (0.2) = 373.0624 ft^3 = 66.4 bbl	Volume Recovered (bbls): 30
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	☒ Yes ☐ No
☐ Condensate	Volume Released (bbls)	Volume Recovered (bbls)
☐ Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
☐ Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered

Cause of Release:
Internal corrosion in pump vibration dampener caused salt water to spray produced water to spray onto the well pad. Some flowed off-site about 300 feet.

Form C-141
Page 2

State of New Mexico
Oil Conservation Division

Incident ID	NOY1826826475
District RP	1RP-5202
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? ☒ Yes ☐ No	If YES, for what reason(s) does the responsible party consider this a major release? Over 25 bbl
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? No	

Initial Response

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

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

If all the actions described above have not been undertaken, explain why: All free produced water has been removed so there no possibility that human health will be affected or further damage to the environment. Released materials stopped spreading when the pump was shut down and the leak stopped.

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: John Allen Title: Environmental Manager

Signature: _____ Date: 10/1/18

email: jallen@btaoil.com Telephone: 432-701-5808

OCD Only

Received by: _____ Date: _____

Form C-141
Page 3

State of New Mexico
Oil Conservation Division

Incident ID	NOY1826826475
District RP	1RP-5202
Facility ID	
Application ID	

Site Assessment/Characterization

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

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

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

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

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

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

Form C-141
Page 4

State of New Mexico
Oil Conservation Division

Incident ID	NOY1826826475
District RP	1RP-5202
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: Kelton Beaird Title: Environmental Manager

Signature: Date: 6-6-23

email: kbeaird@btaoil.com Telephone: 432-312-2203

OCD Only

Received by: Jocelyn Harimon Date: 06/08/2023

Form C-141
Page 5

State of New Mexico
Oil Conservation Division

Incident ID	NOY1826826475
District RP	1RP-5202
Facility ID	
Application ID	

Remediation Plan

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

- [X] Detailed description of proposed remediation technique
- [X] Scaled sitemap with GPS coordinates showing delineation points
- [X] Estimated volume of material to be remediated
- [X] Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- [X] 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 Beaird Title: Environmental Manager

Signature: Date: 6-6-23

email: kbeaird@btaoil.com Telephone: 432-312-2203

OCD Only

Received by: Jocelyn Harimon Date: 06/08/2023

- [ ] 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 225605

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 225605
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	Approved with the following conditions:	6/27/2023
amaxwell	Continue to horizontally delineate sample points (1-4) to 600 mg/kg for chlorides on the outer edges/periphery and include sample points in your next report. This 600 mg/Kg value is discussed in detail in 19.15.29.13 This would be inclusive of both “on-pad” of “off-pad” release area.	6/27/2023
amaxwell	Submit a report via the OCD permitting portal by September 1, 2023.	6/27/2023