



August 22, 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: Closure Request  
Vaca Draw 9418 JV-P 001  
Incident Number nCH1835540209  
Lea County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of BTA Oil Producers, LLC (BTA), has prepared this *Closure Request* to document delineation and soil sampling activities performed at the Vaca Draw 9418 JV-P 001 (Site, Figure 1), in response to the denial of the *Remediation Work Plan (Work Plan)*, submitted June 9, 2023. In the denial, the New Mexico Oil Conservation Division (NMOCD) expressed concern that depth to groundwater was not adequately determined. Based on delineation activities completed and laboratory analytical results from the oil sampling events in accordance with the *Work Plan*, BTA is submitting this *Closure Request*, describing remediation that has occurred and requesting closure for Incident Number nCH1835540209.

Details regarding the release, Site characterization, and proposed remediation activities can be referenced in the original *Work Plan* submitted on June 9, 2023. The original *Work Plan* is included as Appendix A. On July 3, 2023, the NMOCD denied the *Work Plan* for the following reason:

*The report does not meet the requirements of 19.15.29.1 NMAC. The depth to groundwater has not been adequately determined. When nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, and data should be no more than 25 years old, and well construction information should be provided in the submission. The responsible party may choose to remediate to the most stringent levels listed in Table 1 of 19.15.29 NMAC in lieu of drilling to determine the depth to groundwater. The soil boring used to determine depth to ground water is approximately 50 feet higher in elevation than the site. Depth to groundwater will need to be confirmed prior to remediation or the site will need to be closed to the most stringent standard of Table 1. 1RP-5288 closed. Refer to incident #nCH1835540209 in all future communication. Submit a complete report through the OCD Permitting website by October 3, 2023.*

It should be noted the original *Work Plan* proposed additional evaluation of the regional depth to groundwater via installation of a soil boring if delineation soil sample analytical results were compliant with the Site Closure Criteria but exceeded the most stringent Table I Closure Criteria.

BTA Oil Producers, LLC  
Closure Request  
Vaca Draw 9418 JV-P 001

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## BACKGROUND

The Site is located in Unit K, Section 10, Township 25 South, Range 33 East, in Lea County, New Mexico (32.14325°, -103.56234°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM).

On November 25, 2018, an oil hauler pulled oil from the wrong tank and attempted to put it back into a tank that was out of service. The oil released from the man hatch on the backside of the out of service tank. Approximately 25 barrels (bbls) of crude oil were released within the storage tank containment berm. No released fluids were recovered. BTA reported the release to the NMOCD on a Release Notification Form C-141 (Form C-141) on November 27, 2018. The release was assigned Incident Number NCH1835540209.

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 (19.15.29) of the New Mexico Administrative Code (NMAC). Based on the results of the Site Characterization reported in the June 2023 *Work Plan*, 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

## DELINEATION ACTIVITIES AND ANALYTICAL RESULTS

On August 10, 2023, Ensolum personnel were at the Site to evaluate the release extent based on information provided on the Form C-141 and visual observations. No visible indications of the historical release were observed during the Site visit. Four delineation soil samples (SS01 through SS04) were collected around the earthen containment at a depth of 0.5 feet below ground surface (bgs) to assess for the presence or absence of impacted soil resulting from the crude oil release. Boreholes (BH01 and BH02) were advanced via hand auger within the earthen berm to assess the vertical extent of the release. The boreholes were advanced to a depth of 2 feet bgs, upon hand auger refusal. Discrete delineation soil samples BH01/BH01A and BH02/BH02A were collected from the boreholes at depths of 1-foot and 2 feet bgs. Field screening results and observations were logged on lithologic/soil sampling logs, which are included in Appendix B. The delineation soil samples were field screened for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID) and chloride using Hach® chloride QuanTab® test strips. The soil sample locations were mapped utilizing a handheld Global Positioning System (GPS) unit and are depicted on Figure 2. Photographic documentation was completed during the Site visit and a photographic log is included as Appendix C.

The soil samples were placed directly into pre-cleaned glass jars, labeled with the location, date, time, sampler name, method of analysis, and immediately placed on ice. The soil samples were transported under strict chain-of-custody procedures to Cardinal Laboratories (Cardinal) in Hobbs, New Mexico, for analysis of the following chemicals of concern (COCs): 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 SM4500.

Laboratory analytical results for delineation soil samples SS01 through SS04, BH01/BH01A, and BH02/BH02A, collected within and around the inferred release extent, indicated all COC concentrations

BTA Oil Producers, LLC  
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were compliant with the most stringent Table I Closure Criteria and confirmed the absence of impacted soil within and around the inferred release area. Laboratory analytical results are summarized in Table 1 and the complete analytical reports are included as Appendix D.

## CLOSURE REQUEST

Site assessment and delineation activities were conducted at the Site to assess for the presence or absence of impacted soil resulting from the November 2018 release of crude oil. Laboratory analytical results for the delineation soil samples indicated all COC concentrations were compliant with the most stringent Table I Closure Criteria. Based on laboratory analytical results, no impacted soil was identified, and no further remediation is required.

No visible indications of the release were observed. Initial response efforts and natural attenuation appear to have mitigated impacts at this Site. BTA believes these remedial actions are protective of human health, the environment, and groundwater. As such, BTA respectfully requests closure for Incident Number nCH1835540209. Notifications submitted to the NMOCD are included in Appendix E and the final Form C-141 is included as Appendix F.

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

Sincerely,  
**Ensolum, LLC**



Hadlie Green  
Project Geologist



Daniel R. Moir, PG  
Senior Managing Geologist

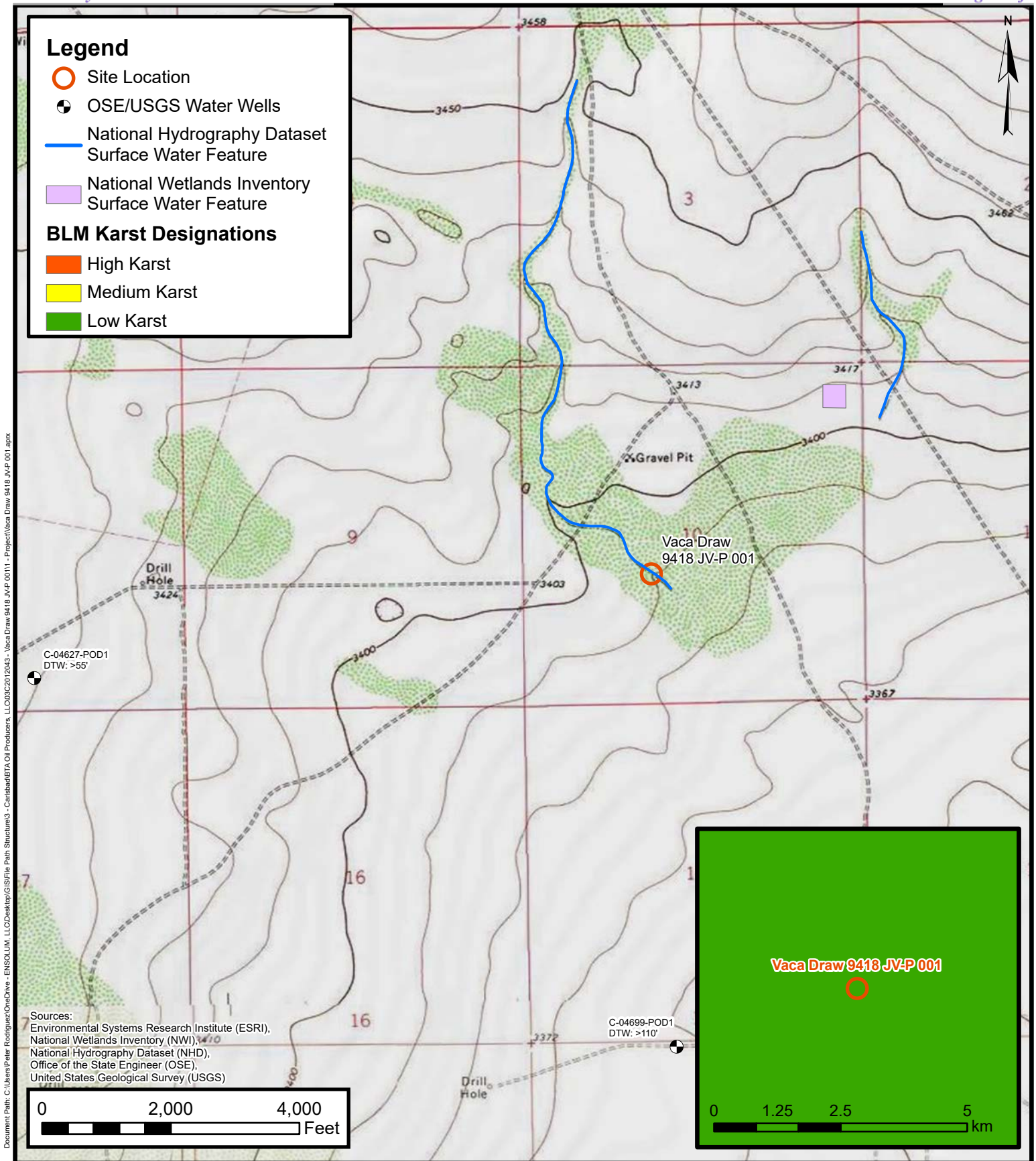
cc: Kelton Beaird, BTA  
Bureau of Land Management

### Appendices:

Figure 1	Site Receptor Map
Figure 2	Delineation Soil Sample Locations
Table 1	Soil Sample Analytical Results
Appendix A	Original Remediation Work Plan
Appendix B	Lithologic Soil Sampling Logs
Appendix C	Photographic Log
Appendix D	Laboratory Analytical Reports & Chain-of-Custody Documentation
Appendix E	NMOCD Notifications
Appendix F	Final C-141



FIGURES



## Site Receptor Map

BTA Oil Producers, LLC

Vaca Draw 9418 JV-P 001

Incident Number: NCH1835540209

Unit K, Sec. 10, T25S, R33E

Lea County, New Mexico

FIGURE

1





**Legend**

- Delineation Soil Sample in Compliance with Closure Criteria
- Earthen Containment Berm



0 25 50  
Feet

Source:  
Environmental Systems Research Institute (ESRI)

**Delineation Soil Sample Locations**

BTA Oil Producers, LLC  
Vaca Draw 9418 JV-P 001  
Incident Number: NCH1835540209  
Unit K, Sec. 10, T25S, R33E  
Lea County, New Mexico

**FIGURE**  
**2**



TABLES



**TABLE 1**  
**SOIL SAMPLE ANALYTICAL RESULTS**  
 Vaca Draw 9418 JV-P 001  
 BTA Oil Producers, LLC  
 Eddy 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 I Closure Criteria (NMAC 19.15.29)			10	50	NE	NE	NE	1,000	2,500	10,000
Delineation Soil Samples										
SS01	08/10/2023	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	32.0
SS02	08/10/2023	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	32.0
SS03	08/10/2023	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	64.0
SS04	08/10/2023	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	96.0
BH01	08/10/2023	1	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	48.0
BH01A	08/10/2023	2	<0.050	<0.300	<10.0	57.6	<10.0	57.6	57.6	32.0
BH02	08/10/2023	1	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	176
BH02A	08/10/2023	2	<0.050	1.65	18.4	104	<10.0	122	122	80.0

## Notes:

bgs: below ground surface

mg/kg: milligrams per kilogram

NMOCD: New Mexico Oil Conservation Division

NMAC: New Mexico Administrative Code

BTEX: Benzene, Toluene, Ethylbenzene, and Xylenes

Concentrations in **bold** exceed the NMOCD Table I Closure Criteria or reclamation standard where applicable.

GRO: Gasoline Range Organics

DRO: Diesel Range Organics

ORO: Oil Range Organics

TPH: Total Petroleum Hydrocarbon





## APPENDIX A

### Original Remediation Work Plan

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June 9, 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: Remediation Work Plan  
Vaca Draw 9418 JV-P 001  
Incident Number NCH1835540209  
Lea County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of BTA Oil Producers, LLC (BTA), has prepared the following *Remediation Work Plan (Work Plan)* for the November 25, 2018, crude oil release at the Vaca Draw 9418 JV-P 001 (Site). The following *Work Plan* proposes to complete Site assessment and delineation activities to assess for the presence or absence of impacted soil resulting from the historical crude oil release at the Site.

**SITE DESCRIPTION AND RELEASE SUMMARY**

The Site is located in Unit K, Section 10, Township 25 South, Range 33 East, in Lea County, New Mexico (32.14325°, -103.56234°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM).

On November 25, 2018, an oil hauler pulled oil from the wrong tank and attempted to put it back into a tank that was out of service. The oil released from the man hatch on the backside of the out of service tank. Approximately 25 barrels (bbls) of crude oil were released within the storage tank containment berm. No released fluids were recovered. BTA reported the release to the New Mexico Oil Conservation Division (NMOCD) on a Release Notification Form C-141 (Form C-141) on November 27, 2018. The release was assigned Incident Number NCH1835540209.

**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 (19.15.29) 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-04699, located approximately 1.4 miles south of the Site. The well was drilled to a depth of 60 feet during January 2023.

BTA Oil Producers, LLC  
Remediation Work Plan  
Vaca Draw 9418 JV-P 001

and no groundwater was encountered. The referenced well records are included in Appendix A. All wells used for depth to groundwater determination are depicted on Figure 1.

A disconnected dry wash is located adjacent to the Site. The closest continuously flowing or significant watercourse to the Site is a wetland located approximately 1.6 miles northeast 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 (low 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

## PROPOSED REMEDIATION WORKPLAN

Based on the unrecovered volume of crude oil, age of the release, and unknown remediation status, BTA proposes to complete Site assessment and delineation activities within and around the release area to assess for the presence or absence of impacted soil resulting from the November 25, 2018, crude oil release within the storage tank containment berm. BTA requests approval to complete the following remediation activities:

- Soil samples will be collected around the storage tank containment berm from a depth of 0.5 feet bgs to assess the lateral extent of the release and confirm that the release did not breach the containment berm.
- Boreholes will be advanced via hand auger within the containment berm to assess the vertical extent of impacted soil or determine if remediation activities have been previously completed.
- The proposed soil sample and borehole locations are shown on the attached Figure 2. The 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 absence of elevated field screening results, the boreholes will be advanced to a minimum depth of 2 feet bgs.

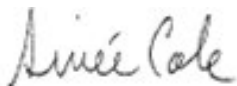
BTA Oil Producers, LLC  
Remediation Work Plan  
Vaca Draw 9418 JV-P 001

- 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 4500.0.
- Upon completion of the lateral and vertical delineation activities and receipt 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.
  - If soil sample analytical results are compliant with the Site Closure Criteria but exceed the most stringent Table I Closure Criteria, a soil boring may be installed to a minimum depth of 51 feet bgs within 0.5 miles of the Site to determine regional depth to groundwater and confirm the Site Closure Criteria. Additionally, a watercourse survey will be completed to confirm that the disconnected dry wash adjacent to the Site does not meet the definition of a continuously flowing watercourse or significant watercourse as defined in Subsection P of 19.15.17.7 NMAC.

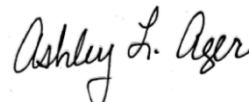
BTA will complete the delineation activities within 90 days of the date of approval of this *Work Plan* by the NMOCD. BTA believes the scope of work described above meets the requirements set forth in 19.15.29.13 NMAC and is protective of human health, the environment, and groundwater. As such, BTA respectfully requests approval of this *Work Plan* for Incident Number NCH1835540209.

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

Sincerely,  
**Ensolum, LLC**



Aimee Cole  
Senior Managing Scientist



Ashley Ager, M.S., PG  
Principal

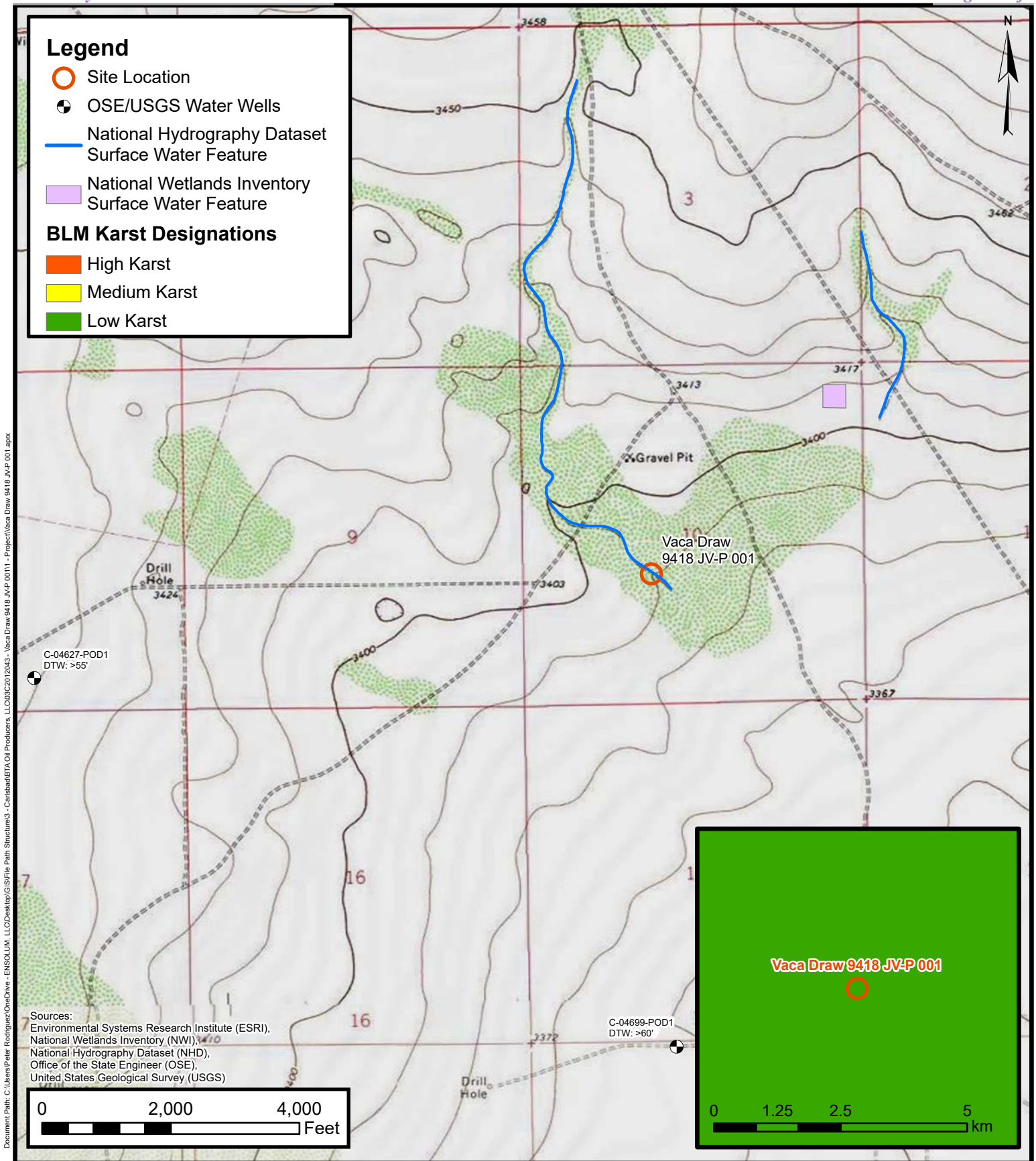
cc: Kelton Beaird, BTA  
Nathan Sirgo, BTA  
Bureau of Land Management

Appendices:

Figure 1	Site Receptor Map
Figure 2	Proposed Delineation Soil Sample Locations
Appendix A	Referenced Well Records
Appendix B	Final C-141



FIGURES



## Site Receptor Map

BTA Oil Producers, LLC

Vaca Draw 9418 JV-P 001

Incident Number: NCH1835540209

Unit K, Sec. 10, T25S, R33E

Lea County, New Mexico

FIGURE

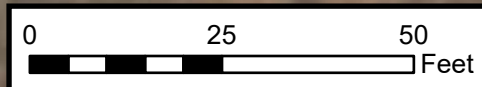
1





**Legend**

- Proposed Soil Sample Location
- Proposed Soil Boring Location
- Earthen Containment Berm



Source:  
Environmental Systems Research Institute (ESRI)

**Proposed Delineation Soil Sample Locations**

BTA Oil Producers, LLC  
Vaca Draw 9418 JV-P 001  
Incident Number: NCH1835540209  
Unit K, Sec. 10, T25S, R33E  
Lea County, New Mexico

**FIGURE**  
**2**



## APPENDIX A

### Referenced Well Records

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# New Mexico Office of the State Engineer

## Water Right Summary



[get image list](#)

**WR File Number:** C 04699      **Subbasin:** CUB      **Cross Reference:** -  
**Primary Purpose:** MON    MONITORING WELL  
**Primary Status:** PMT    PERMIT  
**Total Acres:**      **Subfile:** -      **Header:** -  
**Total Diversion:** 0      **Cause/Case:** -  
**Agent:** BTA OIL PRODUCERS LLC  
**Contact:** BOB HALL  
**Agent:** ENSOLUM, LLC  
**Contact:** TACOMA MORRISSEY

### Documents on File

Trn #	Doc	File/Act	Status		Transaction Desc.	From/	Acres	Diversion	Consumptive
			1	2		To			
<a href="#">get images</a>	<a href="#">740773</a>	<a href="#">EXPL 2023-01-20</a>	PMT	APR	C 04699 POD1	T	0	0	


### Current Points of Diversion

(NAD83 UTM in meters)										
POD Number	Well Tag	Source	Q					X	Y	Other Location Desc
			64	Q16	Q4	Sec	Tw			
<a href="#">C 04699 POD1</a>	NA		2	1	4	22	25S 33E	635709	3554978	 BH01

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

6/7/23 9:35 AM

WATER RIGHT SUMMARY

								Sample Name: BH01/C-04699		Date: 1/3/2023	
								Site Name: Rojo 26 Oil Dump Valve Failure			
								Incident Number: nAPP2224256412			
								Job Number: 03C2012006			
<b>LITHOLOGIC / SOIL SAMPLING LOG</b>								Logged By: CS / MR		Method: Air Rotary	
Coordinates: 32.107784, -103.562235								Hole Diameter: 6"		Total Depth: 60'	
Comments: Soil boring was advanced to a total depth of 60' bgs. No water was observed within the soil boring after at least 72 hours. On 1/16/2023 the soil boring was plugged and abandoned using hydrated bentonite chips.											
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions			
						0	CCHE	(0-30'), CALICHE, coarse grain, well graded, white to tan, dry, no stain or odor.			
Dry	-	-	N	-	-	10					
Dry	-	-	N	-	-	20		@20' color change to pink/tan			
Dry	-	-	N	-	-	30	SP-SM	(30-78'), SAND, medium to fine grain, poorly graded with trace caliche nodules, red to orange, dry, no stain, no odor.			
Dry	-	-	N	-	-	40					
Dry	-	-	N	-	-	50		@50', slightly cohesive with trace clay			
Dry	-	-	N	-	-	60		NOTE: refusal @ 60' using air rotary drill rig due to abundant sand.			
Total Depth @ 60 feet bgs											



# WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

[www.ose.state.nm.us](http://www.ose.state.nm.us)

1. GENERAL AND WELL LOCATION	OSE POD NO. (WELL NO.) POD 1 (TW-1)		WELL TAG ID NO. N/A		OSE FILE NO(S). C-4627		
	WELL OWNER NAME(S) Devon Energy				PHONE (OPTIONAL) 575-748-1838		
	WELL OWNER MAILING ADDRESS 6488 7 Rivers Hwy				CITY Artesia	STATE NM	ZIP 88210
	WELL LOCATION (FROM GPS)	DEGREES LATITUDE 32	MINUTES 8	SECONDS 20.92 N	* ACCURACY REQUIRED: ONE TENTH OF A SECOND		
		LONGITUDE 103	35	36.25 W	* DATUM REQUIRED: WGS 84		
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS - PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE SW SW SE Sec.8 T25S R33S NMPM							
2. DRILLING & CASING INFORMATION	LICENSE NO. 1249		NAME OF LICENSED DRILLER Jackie D. Atkins			NAME OF WELL DRILLING COMPANY Atkins Engineering Associates, Inc.	
	DRILLING STARTED 6/7/2022		DRILLING ENDED 6/7/2022		DEPTH OF COMPLETED WELL (FT) Temporary Well	BORE HOLE DEPTH (FT) ±55	DEPTH WATER FIRST ENCOUNTERED (FT) N/A
	COMPLETED WELL IS: <input type="checkbox"/> ARTESIAN <input checked="" type="checkbox"/> DRY HOLE <input type="checkbox"/> SHALLOW (UNCONFINED)					STATIC WATER LEVEL IN COMPLETED WELL (FT) N/A	DATE STATIC MEASURED 6/13/2022
	DRILLING FLUID: <input type="checkbox"/> AIR <input type="checkbox"/> MUD ADDITIVES - SPECIFY:						
	DRILLING METHOD: <input type="checkbox"/> ROTARY <input type="checkbox"/> HAMMER <input type="checkbox"/> CABLE TOOL <input checked="" type="checkbox"/> OTHER - SPECIFY: Hollow Stem Auger						CHECK HERE IF PITLESS ADAPTER IS INSTALLED <input type="checkbox"/>
	DEPTH (feet bgl) FROM 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)
	0 55		±6.5	Boring-HSA	--	--	--
3. ANNULAR MATERIAL	DEPTH (feet bgl) FROM 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 01/28/2022)

FILE NO. C-4627-POD 1	POD NO. 1	TRN NO. 726174
LOCATION 25.33.08.334	WELL TAG ID NO.	PAGE 1 OF 2



#### 4. HYDROGEOLOGIC LOG OF WELL

### 5. TEST: RIG SUPERVISION

## 5. SIGNATURE

FOR OSE INTERNAL USE		WR-20 WELL RECORD & LOG (Version 01/28/2022)	
FILE NO.	C-4627-POD 1	POD NO.	1
LOCATION		TRN NO.	726174
25 23 08.334		WELL TAG ID NO.	—
		PAGE 2 OF 2	





APPENDIX B

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	nCH1835540209
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party BTA Oil	OGRID 5380
Contact Name Kelton Beaird	Contact Telephone 432-312-2203
Contact email kbeaird@btaoil.com	Incident # (assigned by OCD)
Contact mailing address 104 S. Pecos St. Midland, TX 79701	

### Location of Release Source

Latitude 32.14325 \_\_\_\_\_ Longitude -103.56234 \_\_\_\_\_  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Vaca Draw 9418 JV-P 001	Site Type: Oil & Gas Production
Date Release Discovered 11/25/2018	API# (if applicable)

Unit Letter	Section	Township	Range	County
K	10	25S	33E	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) 25.0	Volume Recovered (bbls) 0.0
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	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 Oil hauler pulled oil from wrong tank. Oil hauler tried to put back into tank that was out of service, resulting in fluid dispensing out of man hatch in the backside of tank.

## Oil Conservation Division

Incident ID	nCH1835540209
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?  Release greater than 25.0 bbl
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: N/A	
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: _____	Date: _____
email: <u>kbeaird@btaoil.com</u>	Telephone: <u>432-321-2203</u>
<b><u>OCD Only</u></b>  Received by: _____ Date: _____	

Incident ID	nCH1835540209
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?	<u>&gt;60</u> (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

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

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

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


Form C-141

State of New Mexico  
Oil Conservation Division

Page 4

Incident ID	nCH1835540209
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: Kelton BeairdTitle: Environmental ManagerSignature: Date: 6-9-23email: kbeaird@btaoil.comTelephone: 432-312-2203**OCD Only**

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

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

Form C-141

Page 5

State of New Mexico  
Oil Conservation Division

Incident ID	nCH1835540209
District RP	
Facility ID	
Application ID	

## Remediation Plan

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

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

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

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

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

Printed Name: Kelton BeairdTitle: Environmental ManagerSignature: Date: 6-9-23email: kbeaird@btaoil.comTelephone: 432-312-2203**OCD Only**

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

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

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

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







## APPENDIX B

### Lithologic Soil Sampling Logs

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								Sample Name: BH01		Date: 8/10/2023	
								Site Name: Vaca Draw 9418 JV-P 001			
								Incident Number: nCH1835540209			
								Job Number: 03C2012043			
<b>LITHOLOGIC / SOIL SAMPLING LOG</b>								Logged By: CH, SW		Method: Hand Auger	
Coordinates: 32.1428929, -103.5627805								Hole Diameter: 4"		Total Depth: 2'	
Comments: Field screening conducted with HACH Chloride Test Strips and PID for chloride and vapor, respectively. Chloride test performed with 1:4 dilution factor of soil to distilled water. 40% correction factors included. ND: Non Detect											
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions			
Dry	ND	0.0	N	BH01	1'	1'	CCHE	Primarily, poorly-sorted, light tan caliche varying in grain size from fine to large gravel, non-plastic, non-cohesive			
Moist	ND	0.0	N	BH01	2'	2'	CCHE	Even mix of light tan to grey caliche and red sand with trace amounts of clay, poorly-sorted with most grains being fine to medium sand up to large gravel, non- to low palsticity and somewhat cohesive due to clay content.			
Note: Hand auger refusal @ 2 feet bgs											
TD @ 2 feet bgs											

								Sample Name: BH02		Date: 8/10/2023	
								Site Name: Vaca Draw 9418 JV-P 001			
								Incident Number: nCH1835540209			
								Job Number: 03C2012043			
<b>LITHOLOGIC / SOIL SAMPLING LOG</b>								Logged By: CS, SW		Method: Hand Auger	
Coordinates: 32.1428929, -103.5626898								Hole Diameter: 4"		Total Depth: 2'	
Comments: Field screening conducted with HACH Chloride Test Strips and PID for chloride and vapor, respectively. Chloride test performed with 1:4 dilution factor of soil to distilled water. 40% correction factors included. ND: Non Detect											
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions			
Dry	ND	0.0	N	BH02	1'	1'	CCHE	Primarily, poorly-sorted, light tan caliche varying in grain size from fine to large gravel, non-plastic, non-cohesive			
Moist	ND	0.0	N	BH02	2'	2'	CCHE	Mostly poorly-sorted caliche, ranging from fine sand to large gravel, with few to trace amounts of red sand intermixed with trace amounts of clay, non-plastic, non-cohesive.			
Note: Hand auger refusal @ 2 feet bgs											
TD @ 2 feet bgs											



## APPENDIX C

### Photographic Log

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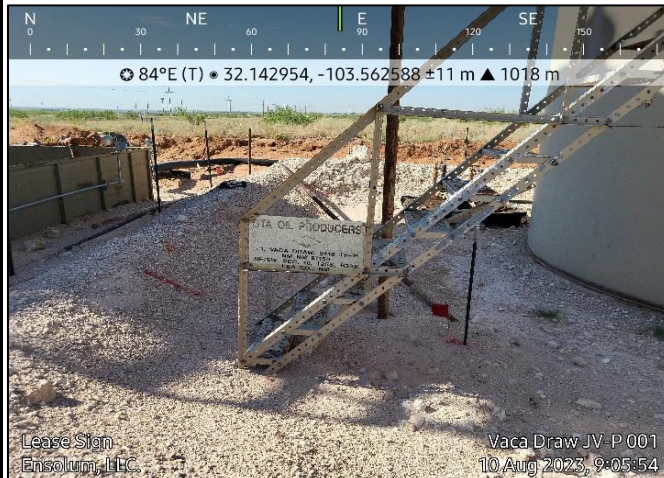


# Photographic Log

BTA Oil Producers, LLC

Vaca Draw 9418 JV-P 001

Incident Number nCH1835540209



Photograph: 1 Date: 8/10/2023  
Description: Well location sign  
View: East



Photograph: 2 Date: 8/10/2023  
Description: Lateral delineation activities, SS03  
View: Northeast



Photograph: 3 Date: 8/10/2023  
Description: Vertical delineation activities, BH01  
View: North



Photograph: 4 Date: 8/10/2023  
Description: Vertical delineation activities, BH02  
View: North



## APPENDIX D

### Laboratory Analytical Reports & Chain of Custody Documentation

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

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August 16, 2023

HADLIE GREEN

ENSOLUM, LLC

705 W WADLEY AVE.

MIDLAND, TX 79705

RE: VACA DRAW 9418 JV-P 001

Enclosed are the results of analyses for samples received by the laboratory on 08/10/23 14:53.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

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

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

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

ENSOLUM, LLC  
 HADLIE GREEN  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 08/10/2023  
 Reported: 08/16/2023  
 Project Name: VACA DRAW 9418 JV-P 001  
 Project Number: 03C2024043  
 Project Location: BTA 32.14325,-103.56234

Sampling Date: 08/10/2023  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Shari Cisneros

**Sample ID: SS 01 0.5' (H234323-01)**

BTX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/15/2023	ND	2.15	108	2.00	2.06		
Toluene*	<0.050	0.050	08/15/2023	ND	2.07	104	2.00	1.27		
Ethylbenzene*	<0.050	0.050	08/15/2023	ND	2.00	100	2.00	1.47		
Total Xylenes*	<0.150	0.150	08/15/2023	ND	6.07	101	6.00	2.32		
Total BTX	<0.300	0.300	08/15/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 94.9 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	08/14/2023	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/14/2023	ND	159	79.5	200	0.686	
DRO >C10-C28*	<10.0	10.0	08/14/2023	ND	173	86.3	200	1.33	
EXT DRO >C28-C36	<10.0	10.0	08/14/2023	ND					

Surrogate: 1-Chlorooctane 101 % 48.2-134

Surrogate: 1-Chlorooctadecane 109 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

ENSOLUM, LLC  
 HADLIE GREEN  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 08/10/2023  
 Reported: 08/16/2023  
 Project Name: VACA DRAW 9418 JV-P 001  
 Project Number: 03C2024043  
 Project Location: BTA 32.14325,-103.56234

Sampling Date: 08/10/2023  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Shari Cisneros

**Sample ID: SS 02 0.5' (H234323-02)**

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/15/2023	ND	2.15	108	2.00	2.06		
Toluene*	<0.050	0.050	08/15/2023	ND	2.07	104	2.00	1.27		
Ethylbenzene*	<0.050	0.050	08/15/2023	ND	2.00	100	2.00	1.47		
Total Xylenes*	<0.150	0.150	08/15/2023	ND	6.07	101	6.00	2.32		
Total BTEx	<0.300	0.300	08/15/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 96.6 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	08/14/2023	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/14/2023	ND	159	79.5	200	0.686	
DRO >C10-C28*	<10.0	10.0	08/14/2023	ND	173	86.3	200	1.33	
EXT DRO >C28-C36	<10.0	10.0	08/14/2023	ND					

Surrogate: 1-Chlorooctane 97.8 % 48.2-134

Surrogate: 1-Chlorooctadecane 106 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

ENSOLUM, LLC  
 HADLIE GREEN  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 08/10/2023  
 Reported: 08/16/2023  
 Project Name: VACA DRAW 9418 JV-P 001  
 Project Number: 03C2024043  
 Project Location: BTA 32.14325,-103.56234

Sampling Date: 08/10/2023  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Shari Cisneros

**Sample ID: SS 03 0.5' (H234323-03)**

BTEX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/15/2023	ND	2.15	108	2.00	2.06		
Toluene*	<0.050	0.050	08/15/2023	ND	2.07	104	2.00	1.27		
Ethylbenzene*	<0.050	0.050	08/15/2023	ND	2.00	100	2.00	1.47		
Total Xylenes*	<0.150	0.150	08/15/2023	ND	6.07	101	6.00	2.32		
Total BTEX	<0.300	0.300	08/15/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 95.9 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	08/14/2023	ND	416	104	400	3.77	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/14/2023	ND	159	79.5	200	0.686	
DRO >C10-C28*	<10.0	10.0	08/14/2023	ND	173	86.3	200	1.33	
EXT DRO >C28-C36	<10.0	10.0	08/14/2023	ND					

Surrogate: 1-Chlorooctane 96.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 104 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

ENSOLUM, LLC  
 HADLIE GREEN  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 08/10/2023  
 Reported: 08/16/2023  
 Project Name: VACA DRAW 9418 JV-P 001  
 Project Number: 03C2024043  
 Project Location: BTA 32.14325,-103.56234

Sampling Date: 08/10/2023  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Shari Cisneros

**Sample ID: SS 04 0.5' (H234323-04)**

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/15/2023	ND	2.04	102	2.00	1.76		
Toluene*	<0.050	0.050	08/15/2023	ND	1.97	98.6	2.00	0.763		
Ethylbenzene*	<0.050	0.050	08/15/2023	ND	1.97	98.6	2.00	3.06		
Total Xylenes*	<0.150	0.150	08/15/2023	ND	5.91	98.5	6.00	3.75		
Total BTEx	<0.300	0.300	08/15/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 103 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	96.0	16.0	08/14/2023	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/14/2023	ND	159	79.5	200	0.686	
DRO >C10-C28*	<10.0	10.0	08/14/2023	ND	173	86.3	200	1.33	
EXT DRO >C28-C36	<10.0	10.0	08/14/2023	ND					

Surrogate: 1-Chlorooctane 99.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 108 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

ENSOLUM, LLC  
 HADLIE GREEN  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 08/10/2023  
 Reported: 08/16/2023  
 Project Name: VACA DRAW 9418 JV-P 001  
 Project Number: 03C2024043  
 Project Location: BTA 32.14325,-103.56234

Sampling Date: 08/10/2023  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Shari Cisneros

**Sample ID: BH 01 1' (H234323-05)**

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/15/2023	ND	2.04	102	2.00	1.76		
Toluene*	<0.050	0.050	08/15/2023	ND	1.97	98.6	2.00	0.763		
Ethylbenzene*	<0.050	0.050	08/15/2023	ND	1.97	98.6	2.00	3.06		
Total Xylenes*	<0.150	0.150	08/15/2023	ND	5.91	98.5	6.00	3.75		
Total BTEx	<0.300	0.300	08/15/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 102 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	08/14/2023	ND	416	104	400	3.77	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/14/2023	ND	159	79.5	200	0.686	
DRO >C10-C28*	<10.0	10.0	08/14/2023	ND	173	86.3	200	1.33	
EXT DRO >C28-C36	<10.0	10.0	08/14/2023	ND					

Surrogate: 1-Chlorooctane 90.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 96.7 % 49.1-148

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager





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

**Analytical Results For:**

ENSOLUM, LLC  
 HADLIE GREEN  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 08/10/2023  
 Reported: 08/16/2023  
 Project Name: VACA DRAW 9418 JV-P 001  
 Project Number: 03C2024043  
 Project Location: BTA 32.14325,-103.56234

Sampling Date: 08/10/2023  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Shari Cisneros

**Sample ID: BH 01 2' (H234323-06)**

BTEX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/15/2023	ND	2.04	102	2.00	1.76		
Toluene*	<0.050	0.050	08/15/2023	ND	1.97	98.6	2.00	0.763		
Ethylbenzene*	<0.050	0.050	08/15/2023	ND	1.97	98.6	2.00	3.06		
Total Xylenes*	<0.150	0.150	08/15/2023	ND	5.91	98.5	6.00	3.75		
Total BTEX	<0.300	0.300	08/15/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 101 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	08/14/2023	ND	432	108	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/14/2023	ND	159	79.5	200	0.686	
DRO >C10-C28*	<10.0	10.0	08/14/2023	ND	173	86.3	200	1.33	
EXT DRO >C28-C36	<10.0	10.0	08/14/2023	ND					

Surrogate: 1-Chlorooctane 98.1 % 48.2-134

Surrogate: 1-Chlorooctadecane 107 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

ENSOLUM, LLC  
 HADLIE GREEN  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 08/10/2023  
 Reported: 08/16/2023  
 Project Name: VACA DRAW 9418 JV-P 001  
 Project Number: 03C2024043  
 Project Location: BTA 32.14325,-103.56234

Sampling Date: 08/10/2023  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Shari Cisneros

**Sample ID: BH 02 1' (H234323-07)**

BTEx 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/15/2023	ND	2.04	102	2.00	1.76	
Toluene*	<0.050	0.050	08/15/2023	ND	1.97	98.6	2.00	0.763	
Ethylbenzene*	<0.050	0.050	08/15/2023	ND	1.97	98.6	2.00	3.06	
Total Xylenes*	<0.150	0.150	08/15/2023	ND	5.91	98.5	6.00	3.75	
Total BTEx	<0.300	0.300	08/15/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 99.4 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	08/14/2023	ND	432	108	400	3.77	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/14/2023	ND	159	79.5	200	0.686	
DRO >C10-C28*	<10.0	10.0	08/14/2023	ND	173	86.3	200	1.33	
EXT DRO >C28-C36	<10.0	10.0	08/14/2023	ND					

Surrogate: 1-Chlorooctane 86.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 94.9 % 49.1-148

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

ENSOLUM, LLC  
 HADLIE GREEN  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 08/10/2023  
 Reported: 08/16/2023  
 Project Name: VACA DRAW 9418 JV-P 001  
 Project Number: 03C2024043  
 Project Location: BTA 32.14325,-103.56234

Sampling Date: 08/10/2023  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Shari Cisneros

**Sample ID: BH 02 2' (H234323-08)**

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/15/2023	ND	2.04	102	2.00	1.76		
Toluene*	<0.050	0.050	08/15/2023	ND	1.97	98.6	2.00	0.763		
Ethylbenzene*	<0.050	0.050	08/15/2023	ND	1.97	98.6	2.00	3.06		
Total Xylenes*	<0.150	0.150	08/15/2023	ND	5.91	98.5	6.00	3.75		
Total BTEx	<0.300	0.300	08/15/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 99.3 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	80.0	16.0	08/14/2023	ND	432	108	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/14/2023	ND	159	79.5	200	0.686	
DRO >C10-C28*	<10.0	10.0	08/14/2023	ND	173	86.3	200	1.33	
EXT DRO >C28-C36	<10.0	10.0	08/14/2023	ND					

Surrogate: 1-Chlorooctane 92.8 % 48.2-134

Surrogate: 1-Chlorooctadecane 103 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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### Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

---

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A handwritten signature in black ink, appearing to read "C. D. Keene", written over a horizontal line.

---

Celey D. Keene, Lab Director/Quality Manager



## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]



## APPENDIX E

### NMOCD Notifications

---



**From:** [Wells, Shelly, EMNRD](#)  
**To:** [Hadlie Green](#)  
**Cc:** [Bratcher, Michael, EMNRD](#); [Maxwell, Ashley, EMNRD](#); [Hamlet, Robert, EMNRD](#); [Hall, Brittany, EMNRD](#); [Harimon, Jocelyn, EMNRD](#)  
**Subject:** RE: [EXTERNAL] BTA - Sampling Notification - Week of 08/07/2023  
**Date:** Thursday, August 3, 2023 2:47:10 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

---

[ \*\*EXTERNAL EMAIL\*\* ]

Hi Hadlie,

Notification requirements are **two business days**, per rule. You may proceed on your schedule. This, and all correspondence, should be included in the closure report to ensure inclusion in the project file.

Thank you,

Shelly

[Shelly Wells](#) \* Environmental Specialist-Advanced  
Administrative Permitting Program  
EMNRD-Oil Conservation Division  
1220 S. St. Francis Drive | Santa Fe, NM 87505  
(505)469-7520 | [Shelly.Wells@emnrd.nm.gov](mailto:Shelly.Wells@emnrd.nm.gov)  
<http://www.emnrd.state.nm.us/OCD/>

---

**From:** Hadlie Green <[hgreen@ensolum.com](mailto:hgreen@ensolum.com)>  
**Sent:** Thursday, August 3, 2023 1:36 PM  
**To:** Enviro, OCD, EMNRD <[OCD.Enviro@emnrd.nm.gov](mailto:OCD.Enviro@emnrd.nm.gov)>  
**Cc:** Kelton Beaird <[KBeaird@btaoil.com](mailto:KBeaird@btaoil.com)>  
**Subject:** [EXTERNAL] BTA - Sampling Notification - Week of 08/07/2023

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

All,

BTA anticipates collecting confirmation samples at the following locations the week of August 7, 2023.

- Mesa B #2 SWD / NOY1826826475
  - Sampling Date: 8/7-8/2023 @ 9:00 AM MST

- Mesa #2H Tank Battery / NRM2026945362
  - Sampling Date: 8/8/2023 @ 9:00 AM MST
- Vaca Draw 9418 JV-P 001 / nCH1835540209
  - Sampling Date: 8/10-11/2023 @ 9:00 AM MST
- Gem 4, 5, 7, 10 Battery, 8705 JV-P / NCH1903263128
  - Sampling Date: 8/10-11/2023 @ 9:00 AM MST
- Mesa 8105 JVP #006H / nOY1814228433
  - Sampling Date: 8/11/2023 @ 9:00 AM MST

Thank you,



**Hadlie Green**

Project Geologist

432-557-8895

[hgreen@ensolum.com](mailto:hgreen@ensolum.com)

**Ensolum, LLC**





APPENDIX F

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	nCH1835540209
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party BTA Oil	OGRID 5380
Contact Name Kelton Beaird	Contact Telephone 432-312-2203
Contact email kbeaird@btaoil.com	Incident # (assigned by OCD)
Contact mailing address 104 S. Pecos St. Midland, TX 79701	

### Location of Release Source

Latitude 32.14325 Longitude -103.56234  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Vaca Draw 9418 JV-P 001	Site Type: Oil & Gas Production
Date Release Discovered 11/25/2018	API# (if applicable)

Unit Letter	Section	Township	Range	County
K	10	25S	33E	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) 25.0	Volume Recovered (bbls) 0.0
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	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 Oil hauler pulled oil from wrong tank. Oil hauler tried to put back into tank that was out of service, resulting in fluid dispensing out of man hatch in the backside of tank.

## Oil Conservation Division

Incident ID	nCH1835540209
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?  Release greater than 25.0 bbl
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: N/A	
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: _____	Date: _____
email: <u>kbeaird@btaoil.com</u>	Telephone: <u>432-321-2203</u>
<b><u>OCD Only</u></b>	
Received by: _____	Date: _____

Incident ID	nCH1835540209
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?	<u>&gt;60</u> (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

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

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

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



Incident ID	nCH1835540209
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?	<u>&gt;100</u> (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

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

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

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

State of New Mexico  
Oil Conservation Division

Page 4

Incident ID	nCH1835540209
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: Kelton Beaird Title: Environmental ManagerSignature:  Date: 8/22/2023email: KBeaird@btaoil.com Telephone: 432-312-2203**OCD Only**Received by: Shelly Wells Date: 8/28/2023

Incident ID	nCH1835540209
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: Kelton Beard Title: Environmental Manager  
Signature:  Date: 8/22/2023  
email: KBeard@btaoil.com Telephone: 432-312-2203

### OCD Only

Received by: Shelly Wells Date: 8/28/2023

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: 9/13/2023  
Printed Name: Brittany Hall Title: Environmental Specialist

**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 258151

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 258151
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
bhall	Closure approved. Site will need to meet the requirements of 19.15.29.13 NMAC at time of facility deconstruction or plugging and abandonment.whichever comes first.	9/13/2023