



December 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: Closure Request  
Rojo 10-13 Tank Battery  
Incident Number NRM2022745673  
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 Rojo 10-13 Tank Battery (Site). The purpose of the Site assessment, delineation, and soil sampling activities was to assess for the presence or absence of impacts to soil following a release of produced water. Based on field observations, delineation activities, and soil sample laboratory analytical results, BTA is submitting this *Closure Request*, describing Site assessment and delineation activities that have occurred and requesting no further action and closure for Incident Number NRM2022745673.

**SITE DESCRIPTION AND RELEASE SUMMARY**

The Site is located in Unit A, Section 27, Township 25 South, Range 33 East, in Lea County, New Mexico (32.10846°, -103.55289°) and is associated with oil and gas exploration and production operations on private land owned by KAML Limited.

On August 12, 2020, a hammer union on the water transfer line failed, resulting in the release of approximately 40 barrels (bbls) of produced water; no fluids were recovered. BTA reported the release to the New Mexico Oil Conservation Division (NMOCD) via a Release Notification Form C-141 (Form C-141) on August 13, 2020. The release was assigned Incident Number NRM2022745673.

**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 a 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 feet to 100 feet below ground surface (bgs) based on the closest groundwater well data. The closest groundwater well with depth to groundwater data is New Mexico Office of the State Engineer (NM OSE) well number C-04698-POD 1, located approximately 0.5 miles west of the Site. On January 3, 2023, a field geologist logged and described soils continuously to a total depth of 60 feet bgs. The borehole was left open for over 72 hours to allow for potential slow infill of groundwater. After the 72-hour waiting period without observing

BTA Oil Producers, LLC  
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groundwater, it was confirmed that groundwater beneath the Site is greater than 60 feet bgs. The borehole was properly abandoned using drill cuttings and hydrated bentonite chips. Based on the soil boring, depth to groundwater at the Site is confirmed to be between 51 feet and 100 feet bgs. All wells used for depth to groundwater determination are depicted on Figure 1 and the referenced well record is included in Appendix A.

The closest continuously flowing or significant watercourse to the Site is an irrigation canal, located approximately 4,246 feet southeast 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
- Total TPH: 2,500 mg/kg
- Chloride: 10,000 mg/kg

## DELINEATION ACTIVITIES AND LABORATORY ANALYTICAL RESULTS

On August 1 and August 2, 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. Seven delineation soil samples (SS01 through SS07) were collected around the release extent at a depth of 0.5 feet below ground surface (bgs) to confirm the lateral extent of the release. Five boreholes (BH01 through BH05) were advanced via hand auger within the release extent to assess for the presence or absence of impacted soil resulting from the release. The boreholes were advanced to depths ranging from 1-foot to 4 feet bgs. Discrete delineation soil samples were collected from the boreholes at depths ranging from 0.5 feet to 4 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 constituents 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 Standard Method SM4500.

Laboratory analytical results for delineation soil samples SS01 through SS07, collected around the release extent, and the delineation samples from boreholes BH01 through BH05, collected within the release extent, indicated all COC concentrations were compliant with the most stringent Table I Closure Criteria and confirmed the absence of impacted soil within and around the release area. Laboratory

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analytical results are summarized in Table 1 and the complete analytical reports are included as Appendix D.

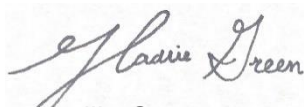
## CLOSURE REQUEST

Site assessment and delineation activities were conducted at the Site to assess for the presence or absence of impacted soil resulting from the August 12, 2020, release of produced water. Laboratory analytical results for the delineation soil samples, collected within and around the release extent, 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 have mitigated impacts at this Site. BTA believes the remedial actions completed are protective of human health, the environment, and groundwater. As such, BTA respectfully requests closure for Incident Number NRM2022745673. 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



Aimee Cole  
Senior Managing Scientist

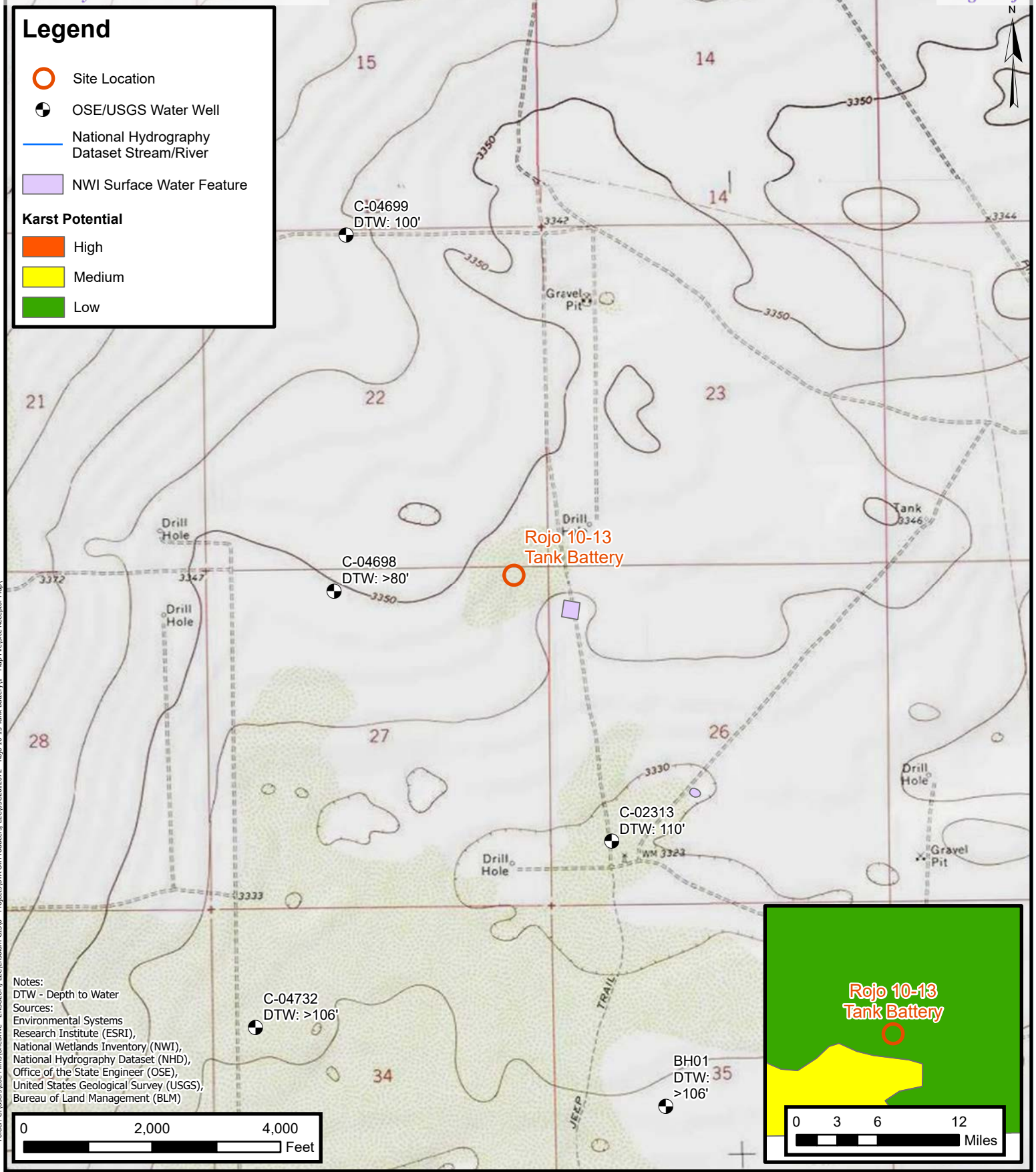
cc: Kelton Beaird, BTA  
KAML Limited

### Appendices:

Figure 1	Site Receptor Map
Figure 2	Delineation Soil Sample Locations
Table 1	Soil Sample Analytical Results
Appendix A	Referenced Well Records
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





**ENSOLUM**  
Environmental, Engineering and  
Hydrogeologic Consultants

# Site Receptor Map

BTA Oil Producers, LLC  
Rojo 10-13 Tank Battery  
Incident Number: NRM2022745673  
Unit A, Sec 27, T25S, R33E  
Lea County, New Mexico

# FIGURE

# 1



**Legend**

- Delineation Soil Sample in Compliance with NMOCD Closure Criteria
- ▲ Point of Release (POR)
- Release Extent



Notes:  
 Sample ID @ Depth Below Ground Surface.  
 NMOCD: New Mexico Oil Conservation Division

0 25 50 100  
 Feet

Sources: Environmental Systems Research Institute (ESRI)



## Delineation Soil Sample Locations

BTA Oil Producers, LLC  
 Rojo 10-13 Tank Battery  
 Incident Number: NRM2022745673  
 Unit A, Sec 27, T25S, R33E  
 Lea County, New Mexico

## FIGURE

## 2



TABLES



**TABLE 1**  
**SOIL SAMPLE ANALYTICAL RESULTS**  
 Rojo 10-13 Tank Battery  
 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 I Closure Criteria (NMAC 19.15.29)			10	50	NE	NE	NE	1,000	2,500	10,000
Delineation Soil Samples										
SS01	08/02/2023	0.5	<0.025	<0.275	<25.0	<25.0	<25.0	<25.0	<25.0	16.0
SS02	08/02/2023	0.5	<0.025	<0.275	<25.0	<25.0	<25.0	<25.0	<25.0	16.0
SS03	08/02/2023	0.5	<0.025	<0.275	<25.0	<25.0	<25.0	<25.0	<25.0	16.0
SS04	08/02/2023	0.5	<0.025	<0.275	<25.0	<25.0	<25.0	<25.0	<25.0	16.0
SS05	08/02/2023	0.5	<0.025	<0.275	<25.0	<25.0	<25.0	<25.0	<25.0	16.0
SS06	08/02/2023	0.5	<0.025	<0.275	<25.0	<25.0	<25.0	<25.0	<25.0	<16.0
SS07	08/02/2023	0.5	<0.025	<0.275	<25.0	<25.0	<25.0	<25.0	<25.0	<16.0
BH01A	08/01/2023	1	<0.025	<0.275	<25.0	<25.0	<25.0	<25.0	<25.0	16.0
BH01C	08/01/2023	3	<0.025	<0.275	<25.0	<25.0	<25.0	<25.0	<25.0	48.0
BH02A	08/01/2023	1	<0.025	<0.275	<25.0	<25.0	<25.0	<25.0	<25.0	128
BH02D	08/01/2023	4	<0.025	<0.275	<25.0	<25.0	<25.0	<25.0	<25.0	320
BH03	08/02/2023	0.5	<0.025	<0.275	<25.0	<25.0	<25.0	<25.0	<25.0	32.0
BH03A	08/02/2023	1	<0.025	<0.275	<25.0	<25.0	<25.0	<25.0	<25.0	48.0
BH04	08/02/2023	0.5	<0.025	<0.275	<25.0	<25.0	<25.0	<25.0	<25.0	96.0
BH04C	08/02/2023	3	<0.025	<0.275	<25.0	<25.0	<25.0	<25.0	<25.0	48.0
BH05	08/02/2023	0.5	<0.025	<0.275	<25.0	<25.0	<25.0	<25.0	<25.0	16.0
BH05A	08/02/2023	1	<0.025	<0.275	<25.0	<25.0	<25.0	<25.0	<25.0	16.0

## 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

### Referenced Well Records

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								Sample Name: BH01 / C-04698		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 PLUGGING PLAN OF OPERATIONS



**NOTE:** A Well Plugging Plan of Operations shall be filed with and accepted by the Office of the State Engineer prior to plugging. This form may be used to plug a single well, or if you are plugging multiple monitoring wells on the same site using the same plugging methodology.

Alert! Your well may be eligible to participate in the Aquifer Mapping Program (AMP)-NM Bureau of Geology [geoinfo.nmt.edu/resources/water/cgmn/](http://geoinfo.nmt.edu/resources/water/cgmn/) if within an area of interest and meets the minimum construction requirements, such as there is still water in your well, and the well construction reflected in a well record and log is not compromised, contact AMP at 575-835-5038 or -6951, or by email [anbg-waterlevels@nmt.edu](mailto:anbg-waterlevels@nmt.edu), prior to completing this prior form. Showing proof to the OSE that your well was accepted in this program, may delay the plugging of your well until a later date.

**I. FILING FEE:** There is no filing fee for this form.

**II. GENERAL / WELL OWNERSHIP:** ☐ Check here if proposing one plan for multiple monitoring wells on the same site and attaching WD-08m

Existing Office of the State Engineer POD Number (Well Number) for well to be plugged: BH01 C-4698-POD1  
 Name of well owner: BTA Oil Producers, LLC  
 Mailing address: 104 S. Pecos Street County: \_\_\_\_\_  
 City: Midland State: TX Zip code: 79701  
 Phone number: 432-682-3753 E-mail: bhall@btaoil.com

### III. WELL DRILLER INFORMATION:

Well Driller contracted to provide plugging services: West Texas Drilling Services  
 New Mexico Well Driller License No.: WD #1184 Expiration Date: 10/31/2023

**IV. WELL INFORMATION:** ☐ Check here if this plan describes method for plugging multiple monitoring wells on the same site and attach supplemental form WD-08m and skip to #2 in this section.

Note: A copy of the existing Well Record for the well(s) to be plugged should be attached to this plan.

1) GPS Well Location: Latitude: 32 deg, 6 min, 28.0224 sec  
 Longitude: 103 deg, 33 min, 44.046 sec, NAD 83

2) Reason(s) for plugging well(s):

Soil boring

3) Was well used for any type of monitoring program? No If yes, please use section VII of this form to detail what hydrogeologic parameters were monitored. If the well was used to monitor contaminated or poor quality water, authorization from the New Mexico Environment Department may be required prior to plugging.

4) Does the well tap brackish, saline, or otherwise poor quality water? NA If yes, provide additional detail, including analytical results and/or laboratory report(s): \_\_\_\_\_

5) Static water level: >100 feet below land surface / feet above land surface (circle one)

6) Depth of the well: 110 feet

- 7) Inside diameter of innermost casing: 2 inches.
- 8) Casing material: Temporary PVC SCF 40
- 9) The well was constructed with:  
☐ an open-hole production interval, state the open interval: NA  
☐ a well screen or perforated pipe, state the screened interval(s): NA
- 10) What annular interval surrounding the artesian casing of this well is cement-grouted? NA
- 11) Was the well built with surface casing? No If yes, is the annulus surrounding the surface casing grouted or otherwise sealed?                      If yes, please describe:
- 12) Has all pumping equipment and associated piping been removed from the well?                      If not, describe remaining equipment and intentions to remove prior to plugging in Section VII of this form.

**V. DESCRIPTION OF PLANNED WELL PLUGGING:** ☐ If plugging method differs between multiple wells on same site, a separate form must be completed for each method.

Note: If this plan proposes to plug an artesian well in a way other than with cement grout, placed bottom to top with a tremie pipe, a detailed diagram of the well showing proposed final plugged configuration shall be attached, as well as any additional technical information, such as geophysical logs, that are necessary to adequately describe the proposal. Attach a copy of any signed OSE variance to this plugging plan.

Also, if this planned plugging plan requires a variance to 19.27.4 NMAC, attach a detailed variance request signed by the applicant.

- 1) Describe the method by which cement grout shall be placed in the well, or describe requested plugging methodology proposed for the well:

The temporary 2" we;; material will be removed. If no water is encountered, drill cuttings will be used to ten feet below ground surface (bgs) and plugged using hydrated bentonite. If groundwater is encountered the boring will be plugged, tremie from bottom to a slurry of Portland Type I/II Neat cement in lifts.

- 2) Will well head be cut-off below land surface after plugging? NA

**VI. PLUGGING AND SEALING MATERIALS:**

Note: The plugging of a well that taps poor quality water may require the use of a specialty cement or specialty sealant. Attach a copy of the batch mix recipe from the cement company and/or product description for specialty cement mixes or any sealant that deviates from the list of OSE approved sealants.

- 1) For plugging intervals that employ cement grout, complete and attach Table A.
- 2) For plugging intervals that will employ approved non-cement based sealant(s), complete and attach Table B.
- 3) Theoretical volume of grout required to plug the well to land surface: 287
- 4) Type of Cement proposed: Type I/II
- 5) Proposed cement grout mix: <6.0 gallons of water per 94 pound sack of Portland cement.
- 6) Will the grout be:            batch-mixed and delivered to the site  
X mixed on site

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- 7) Grout additives requested, and percent by dry weight relative to cement:

NA

- 8) Additional notes and calculations:

NA

**VII. ADDITIONAL INFORMATION:** List additional information below, or on separate sheet(s):

NA

**VIII. SIGNATURE:**

I, BOB HALL, say that I have carefully read the foregoing Well Plugging Plan of Operations and any attachments, which are a part hereof; that I am familiar with the rules and regulations of the State Engineer pertaining to the plugging of wells and will comply with them, and that each and all of the statements in the Well Plugging Plan of Operations and attachments are true to the best of my knowledge and belief.

Bob Hall

Signature of Applicant

01/08/2023

Date

**IX. ACTION OF THE STATE ENGINEER:**

This Well Plugging Plan of Operations is:

☒

Approved subject to the attached conditions.

☐

Not approved for the reasons provided on the attached letter.

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Witness my hand and official seal this 20<sup>th</sup> day of January, 2023



Mike A. Namphong P.E., New Mexico State Engineer

By: K. Parekh

KASHYAP PAREKH  
W. R. M. I.

WD-08 Well Plugging Plan  
Version: July 31, 2019  
Page 3 of 5



**TABLE A - For plugging intervals that employ cement grout. Start with deepest interval.**

	Interval 1 – deepest	Interval 2	Interval 3 – most shallow
			Note: if the well is non-artesian and breaches only one aquifer, use only this column.
Top of proposed interval of grout placement (ft bgl)	NA	NA	0
Bottom of proposed interval of grout placement (ft bgl)	NA	NA	100
Theoretical volume of grout required per interval (gallons)	NA	NA	287
Proposed cement grout mix gallons of water per 94-lb. sack of Portland cement	NA	NA	<6.0
Mixed on-site or batch-mixed and delivered?	NA	NA	onsite
Grout additive 1 requested	NA	NA	NA
Additive 1 percent by dry weight relative to cement	NA	NA	NA
Grout additive 2 requested	NA	NA	NA
Additive 2 percent by dry weight relative to cement	NA	NA	NA

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**TABLE B - For plugging intervals that will employ approved non-cement based sealant(s). Start with deepest interval.**

	Interval 1 – deepest	Interval 2	Interval 3 – most shallow
			Note: if the well is non-artesian and breaches only one aquifer, use only this column.
Top of proposed interval of sealant placement (ft bgl)	NA	NA	0
Bottom of proposed sealant of grout placement (ft bgl)	NA	NA	10
Theoretical volume of sealant required per interval (gallons)	NA	NA	26
Proposed abandonment sealant (manufacturer and trade name)	NA	NA	Bariod Hole Plug

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**STATE OF NEW MEXICO**  
**OFFICE OF THE STATE ENGINEER**  
**ROSWELL**

1900 West Second St.  
 Roswell, New Mexico 88201  
 Phone: (575) 622-6521  
 Fax: (575) 623- 8559

Applicant has identified wells, listed below, to be plugged. West Texas Drilling Services (WD-1184) will perform the plugging.

Permittee: BTA Oil Producers, LLC  
 NMOSE Permit Number: C-4698-POD1

NMOSE File	Casing diameter (inches)	Well depth (feet bgl)	Approximate static water level (feet bgl)	Latitude	Longitude
C-4698-POD1	2.0 (Soil Boring)	110	100	32° 6' 28.0224"	103° 33' 44.046"

**Specific Plugging Conditions of Approval for Well located in Lea County, New Mexico.**

1. Water well drilling and well drilling activities, including well plugging, are regulated under 19.27.4 NMAC, which requires any person engaged in the business of well drilling within New Mexico to obtain a Well Driller License issued by the New Mexico Office of the State Engineer (NMOSE). Therefore, the firm of a New Mexico licensed Well Driller shall perform the well plugging.

**2. Ground Water encountered:** The total Theoretical volume of sealant required for abandonment of soil boring well is approximately 17.94 gallons. Total minimum volume of necessary sealant shall be calculated upon sounding the actual pluggable depth of well, which is estimated at 110 feet.

**3. Dry Hole:** The total Theoretical volume of sealant required for abandonment of soil boring well is approximately 1.63 gallons. Total minimum volume of necessary sealant shall be calculated upon sounding the actual pluggable depth of well, which is estimated at 10 feet.

**4. Ground Water encountered:** Type I/II Portland cement mixed with 5.2 to 6.0 gallons of fresh water per 94-lb sack of cement is approved for the plugging the well.

**5. Dry Hole:** (a) Drill cuttings up to ten feet of land surface. (b) 10 feet to 0 feet – Hydrated bentonite. The bentonite shall be hydrated separately with its required increments of water prior to being mixed into the cement slurry.

6. Sealant shall be placed by pumping through a tremie pipe extended to near well bottom and kept below top of the slurry column as the well is plugged from bottom-upwards in a manner that displaces the standing water column upwards from below. Tremie pipe may be pulled as necessary to retain minimal submergence in the advancing column of sealant.
7. Should cement "shrinks-back" occur in the well, use of a tremie for topping off is required for cement placement deeper than 20 feet below land surface or if water is present in the casing. The approved sealant for topping off is identified in condition 3. and 4. of these Specific Conditions of Approval.
8. Any open annulus encountered surrounding the casing shall also be sealed by the placement of the approved sealant. When plugging shallow wells with no construction or environmental concerns, and if the well record on a well to be plugged shows a proper 20-foot annular seal, a plugging plan can propose the use of clean fill material to a nominal 30 feet bgs, then placing an OSE approved sealant to surface. Lacking that information, we would require an excavation of at least 2-feet which shall then be filled in its entirety with sealant to surface.
9. Should the NMED, or another regulatory agency sharing jurisdiction of the project authorize, or by regulation require a more stringent well plugging procedure than herein acknowledged, the more-stringent procedure should be followed. This, in part, includes provisions regarding pre-authorization to proceed, contaminant remediation, inspection, pulling/perforating of casing, or prohibition of free discharge of any fluid from the borehole during or related to the plugging process.
10. NMOSE witnessing of the plugging of the soil boring will not be required.
11. Any deviation from this plan must obtain an approved variance from this office prior to implementation.
12. A Well Plugging Record itemizing actual abandonment process and materials used shall be filed with the State Engineer within 30 days after completion of well plugging. For the plugging record, please resurvey coordinate location for well and note coordinate system for GPS unit. Please attach a copy of these plugging conditions.

The NMOSE Well Plugging Plan of Operations is hereby approved with the aforesaid conditions applied.

Witness my hand and seal this 20<sup>th</sup> day of January 2023

Mike A. Hamman, P.E. State Engineer



By: \_\_\_\_\_

*K. Parekh*

Kashyap Parekh  
Water Resources Manager I





**STATE OF NEW MEXICO**  
OFFICE OF THE STATE ENGINEER  
ROSWELL

**Mike A. Hamman, P.E.**  
State Engineer

**DISTRICT II**  
1900 West Second St.  
Roswell, New Mexico 88201  
Phone: (575) 622-6521  
Fax: (575) 623-8559

January 20, 2023

BTA Oil Producers, LLC  
104 S. Pecos Street  
Midland, TX 79701

RE: Well Plugging Plan of Operations for well no. C-4698-POD1

Greetings:

Enclosed is your copy of the Well Plugging Plan of Operations for the above referenced well subject to the attached Conditions of Approval. The proposed method of operation is found to be acceptable and in accordance with the Rules and Regulations Governing Well Driller Licensing; Construction, Repair and Plugging of Wells 19.27.4 NMAC adopted June 30, 2017 by the State Engineer. subject to the attached Conditions of Approval.

Well Plugging Plan of Operations form (WD-08) has been updated. Current form can be found on the OSE website at the following link <https://www.ose.state.nm.us/Statewide/wdForms.php>.

Within 30 days after the well is plugged, the well driller is required to file a complete plugging record with the OSE and the permit holder.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Parekh".

Kashyap Parekh  
Water Resources Manager I








## APPENDIX B


### Lithologic Soil Sampling Logs

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 <b>ENSOLUM</b>		Sample Name: BH01		Date: 8/1/23				
		Site Name: Rojo 10-13 Tank Battery						
		Incident Number: NRM2022745673						
		Job Number: 03C2012072						
<b>LITHOLOGIC / SOIL SAMPLING LOG</b>								
Coordinates: 32.108463, -103.553357			Logged By: Tabitha Guadin		Method: Handauger			
Hole Diameter: 2in			Total Depth: 3 ft bgs					
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 factor included.								
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions
Dry	257	0.9	N	BH01		0		
Dry	132.6	244.7	N	BH01A	1	0.5	SP	SAND, brown, poorly sorted, no odor, no staining
Dry	102.5	347.8	N	BH01B		1	SP	SAND, red, brown, poorly sorted, no odor, no staining
Dry	207.7	417.3	N	BH01C	3	2	SP	SAA
						3	SP	SAA
Refusal @ 3 feet bgs TD at 3 ft bgs								

 <b>ENSOLUM</b>						Sample Name: BH02		Date: 8/1/23	
						Site Name: Rojo 10-13 Tank Battery			
						Incident Number: NRM2022745673			
						Job Number: 03C2012072			
<b>LITHOLOGIC / SOIL SAMPLING LOG</b>						Logged By: Tabitha Guadin		Method: Handauger	
Coordinates: 32.108472, -103.553105						Hole Diameter: 2in		Total Depth: 4 ft bgs	
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 factor included.									
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions	
Dry	429.5	0.4	N	BH02		0			
						0.5	CCHE	Caliche, sand, gray, brown, no staining, no odor	
Moist	461.5	201.3	N	BH02A	1	1	SW	SAND, reddish brown, well sorted, no staining, no odor	
Moist	428.2	273.8	N	BH02B		2	SP	SAND, reddish brown, poorly sorted, no staining, no odor	
Moist	572.4	142.2	N	BH02C		3	SP	SAA	
Moist	875	108.7	N	BH02D	4	4	SW	Caliche, sand, white, gray, brown, well sorted, no staining, no odor	
TD at 4 ft bgs									

								Sample Name: BH03		Date: 8/2/23	
								Site Name: Rojo 10-13 Tank Battery			
								Incident Number: NRM2022745673			
								Job Number: 03C2012072			
<b>LITHOLOGIC / SOIL SAMPLING LOG</b>								Logged By: Tabitha Guadin		Method: Handauger	
Coordinates: 32.108533, -103.553112								Hole Diameter: 2in		Total Depth: 1 ft bg	
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 factor included.											
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions			
Dry	118.6	116.5	N	BH03	0.5	0	CCHE	CALICHE, white, tan, well-sorted, no staining, no odor SAA (Same as above)  Refusal at 1 ft bgs TD at 1 ft bg			
Dry	134.6	442.2	N	BH03A	1	1	SAA				

								Sample Name: BH04		Date: 8/2/23	
								Site Name: Rojo 10-13 Tank Battery			
								Incident Number: NRM2022745673			
								Job Number: 03C2012072			
<b>LITHOLOGIC / SOIL SAMPLING LOG</b>								Logged By: Tabitha Guadin		Method: Handauger	
Coordinates: 32.108467, -103.552885								Hole Diameter: 2in		Total Depth: 4 ft bgs	
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 factor included.											
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions			
Moist	312.8	272.3	N	BH04	0.5	0	SW	SAND, brown, well sorted, no staining, no odor			
Moist	298.1	241	N	BH04A		1	SAA	SAA no staining			
Moist	232	285.2	N	BH04B		2	SW	SAND, reddish-brown, white, well-sorted, no staining, no odor			
Moist	322.5	432.4	N	BH04C	3	3	SW	SAND, caliche, well sorted, no staining, no odor, brown, white			
Refusal at 3 ft bgs TD at 3 ft bgs											



								Sample Name: BH05		Date: 8/2/23	
								Site Name: Rojo 10-13 Tank Battery			
								Incident Number: NRM2022745673			
								Job Number: 03C2012072			
<b>LITHOLOGIC / SOIL SAMPLING LOG</b>								Logged By: Tabitha Guadin		Method: Handauger	
Coordinates: 32.108493, -103.552700								Hole Diameter: 2in		Total Depth: 1 ft bg	
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 factor included.											
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions			
Dry	79.5	19.4	N	BH05	0.5	0	SP	SAND, light brown, poorly sorted, no staining, no odor			
Dry	109	35.3	N	BH05A	1	1	SW	SAND, light brown, rocky, well sorted, no staining, no odor Refusal @ 1 ft bgs TD at 1 ft bg			



## APPENDIX C

### Photographic Log

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**Photographic Log**

BTA Oil Producers

Rojo 10-13 Tank Battery

Incident Number NRM2022745673

Date & Time: Tue, Aug 01, 2023 at 11:43:03 MDT  
Position: 032.108460°N / 103.553406°W (±15.1ft)  
Altitude: 3377ft (±11.6ft)  
Datum: WGS-84  
Azimuth/Bearing: 060° N60E 1067mils True (±10°)  
Elevation Angle: -11.5°  
Horizon Angle: -00.6°  
Zoom: 0.5X



Photograph 1

Date: August 1, 2023

Description: View of release extent during delineation activities, facing east.

Date & Time: Tue, Aug 01, 2023 at 11:43:38 MDT  
Position: 032.108473°N / 103.553141°W (±15.5ft)  
Altitude: 3363ft (±11.1ft)  
Datum: WGS-84  
Azimuth/Bearing: 216° S36W 3840mils True (±10°)  
Elevation Angle: -15.5°  
Horizon Angle: -00.9°  
Zoom: 0.5X



Photograph 1

Date: August 1, 2023

Description: View of release extent during delineation activities, facing west.



## 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 09, 2023

HADLIE GREEN

ENSOLUM, LLC

705 W WADLEY AVE.

MIDLAND, TX 79705

RE: ROJO 7811 27 FEDERAL COM 13H

Enclosed are the results of analyses for samples received by the laboratory on 08/02/23 15:25.

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:	08/02/2023	Sampling Date:	08/01/2023
Reported:	08/09/2023	Sampling Type:	Soil
Project Name:	ROJO 7811 27 FEDERAL COM 13H	Sampling Condition:	Cool & Intact
Project Number:	03C2012045	Sample Received By:	Tamara Oldaker
Project Location:	BTA		

**Sample ID: BH 01 A 1' (H234093-01)**

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.025	0.025	08/08/2023	ND	2.08	104	2.00	2.45	
Toluene*	<0.050	0.050	08/08/2023	ND	1.99	99.7	2.00	2.50	
Ethylbenzene*	<0.050	0.050	08/08/2023	ND	2.02	101	2.00	1.57	
Total Xylenes*	<0.150	0.150	08/08/2023	ND	6.06	101	6.00	1.70	
Total BTEX	<0.275	0.275	08/08/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 104 % 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	16.0	16.0	08/07/2023	ND	432	108	400	0.00	

TPH TX1005		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C12	<25.0	25.0	08/07/2023	ND	165	82.4	200	5.29	
DRO >C12-C28	<25.0	25.0	08/07/2023	ND	151	75.5	200	6.43	
DRO >C28-C35	<25.0	25.0	08/07/2023	ND					
Total TPH C6-C35*	<25.0	25.0	08/07/2023	ND	317	79.2	400	5.80	

Surrogate: 1-Chlorooctane 83.8 % 44.9-134

Surrogate: 1-Chlorooctadecane 84.8 % 41.4-161

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:	08/02/2023	Sampling Date:	08/01/2023
Reported:	08/09/2023	Sampling Type:	Soil
Project Name:	ROJO 7811 27 FEDERAL COM 13H	Sampling Condition:	Cool & Intact
Project Number:	03C2012045	Sample Received By:	Tamara Oldaker
Project Location:	BTA		

**Sample ID: BH 01 C 3' (H234093-02)**

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.025	0.025	08/08/2023	ND	2.08	104	2.00	2.45	
Toluene*	<0.050	0.050	08/08/2023	ND	1.99	99.7	2.00	2.50	
Ethylbenzene*	<0.050	0.050	08/08/2023	ND	2.02	101	2.00	1.57	
Total Xylenes*	<0.150	0.150	08/08/2023	ND	6.06	101	6.00	1.70	
Total BTEX	<0.275	0.275	08/08/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 104 % 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	08/07/2023	ND	432	108	400	0.00	

TPH TX1005		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C12	<25.0	25.0	08/07/2023	ND	154	77.2	200	1.31	
DRO >C12-C28	<25.0	25.0	08/07/2023	ND	174	87.1	200	2.17	
DRO >C28-C35	<25.0	25.0	08/07/2023	ND					
Total TPH C6-C35*	<25.0	25.0	08/07/2023	ND	331	82.8	400	1.74	

Surrogate: 1-Chlorooctane 95.0 % 44.9-134

Surrogate: 1-Chlorooctadecane 104 % 41.4-161

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:	08/02/2023	Sampling Date:	08/01/2023
Reported:	08/09/2023	Sampling Type:	Soil
Project Name:	ROJO 7811 27 FEDERAL COM 13H	Sampling Condition:	Cool & Intact
Project Number:	03C2012045	Sample Received By:	Tamara Oldaker
Project Location:	BTA		

**Sample ID: BH 02 A 1' (H234093-03)**

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.025	0.025	08/08/2023	ND	2.08	104	2.00	2.45	
Toluene*	<0.050	0.050	08/08/2023	ND	1.99	99.7	2.00	2.50	
Ethylbenzene*	<0.050	0.050	08/08/2023	ND	2.02	101	2.00	1.57	
Total Xylenes*	<0.150	0.150	08/08/2023	ND	6.06	101	6.00	1.70	
Total BTEX	<0.275	0.275	08/08/2023	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	128	16.0	08/07/2023	ND	432	108	400	0.00		

TPH TX1005		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C12	<25.0	25.0	08/07/2023	ND	154	77.2	200	1.31	
DRO >C12-C28	<25.0	25.0	08/07/2023	ND	174	87.1	200	2.17	
DRO >C28-C35	<25.0	25.0	08/07/2023	ND					
Total TPH C6-C35*	<25.0	25.0	08/07/2023	ND	331	82.8	400	1.74	

Surrogate: 1-Chlorooctane 101 % 44.9-134

Surrogate: 1-Chlorooctadecane 110 % 41.4-161

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:	08/02/2023	Sampling Date:	08/01/2023
Reported:	08/09/2023	Sampling Type:	Soil
Project Name:	ROJO 7811 27 FEDERAL COM 13H	Sampling Condition:	Cool & Intact
Project Number:	03C2012045	Sample Received By:	Tamara Oldaker
Project Location:	BTA		

**Sample ID: BH 02 D 4' (H234093-04)**

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.025	0.025	08/08/2023	ND	2.08	104	2.00	2.45	
Toluene*	<0.050	0.050	08/08/2023	ND	1.99	99.7	2.00	2.50	
Ethylbenzene*	<0.050	0.050	08/08/2023	ND	2.02	101	2.00	1.57	
Total Xylenes*	<0.150	0.150	08/08/2023	ND	6.06	101	6.00	1.70	
Total BTEX	<0.275	0.275	08/08/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 101 % 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	320	16.0	08/07/2023	ND	432	108	400	0.00		

TPH TX1005		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C12	<25.0	25.0	08/07/2023	ND	154	77.2	200	1.31	
DRO >C12-C28	<25.0	25.0	08/07/2023	ND	174	87.1	200	2.17	
DRO >C28-C35	<25.0	25.0	08/07/2023	ND					
Total TPH C6-C35*	<25.0	25.0	08/07/2023	ND	331	82.8	400	1.74	

Surrogate: 1-Chlorooctane 94.1 % 44.9-134

Surrogate: 1-Chlorooctadecane 99.9 % 41.4-161

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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:	08/02/2023	Sampling Date:	08/02/2023
Reported:	08/09/2023	Sampling Type:	Soil
Project Name:	ROJO 7811 27 FEDERAL COM 13H	Sampling Condition:	Cool & Intact
Project Number:	03C2012045	Sample Received By:	Tamara Oldaker
Project Location:	BTA		

**Sample ID: BH 03 .5' (H234093-05)**

BTEx 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.025	0.025	08/08/2023	ND	2.08	104	2.00	2.45	
Toluene*	<0.050	0.050	08/08/2023	ND	1.99	99.7	2.00	2.50	
Ethylbenzene*	<0.050	0.050	08/08/2023	ND	2.02	101	2.00	1.57	
Total Xylenes*	<0.150	0.150	08/08/2023	ND	6.06	101	6.00	1.70	
Total BTEX	<0.275	0.275	08/08/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 99.5 % 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	08/07/2023	ND	432	108	400	0.00		

TPH TX1005		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C12	<25.0	25.0	08/07/2023	ND	154	77.2	200	1.31	
DRO >C12-C28	<25.0	25.0	08/07/2023	ND	174	87.1	200	2.17	
DRO >C28-C35	<25.0	25.0	08/07/2023	ND					
Total TPH C6-C35*	<25.0	25.0	08/07/2023	ND	331	82.8	400	1.74	

Surrogate: 1-Chlorooctane 96.8 % 44.9-134

Surrogate: 1-Chlorooctadecane 105 % 41.4-161

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:	08/02/2023	Sampling Date:	08/02/2023
Reported:	08/09/2023	Sampling Type:	Soil
Project Name:	ROJO 7811 27 FEDERAL COM 13H	Sampling Condition:	Cool & Intact
Project Number:	03C2012045	Sample Received By:	Tamara Oldaker
Project Location:	BTA		

**Sample ID: BH 03 A 1' (H234093-06)**

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.025	0.025	08/08/2023	ND	2.08	104	2.00	2.45	
Toluene*	<0.050	0.050	08/08/2023	ND	1.99	99.7	2.00	2.50	
Ethylbenzene*	<0.050	0.050	08/08/2023	ND	2.02	101	2.00	1.57	
Total Xylenes*	<0.150	0.150	08/08/2023	ND	6.06	101	6.00	1.70	
Total BTEX	<0.275	0.275	08/08/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 106 % 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	08/07/2023	ND	432	108	400	0.00	

TPH TX1005		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C12	<25.0	25.0	08/07/2023	ND	154	77.2	200	1.31	
DRO >C12-C28	<25.0	25.0	08/07/2023	ND	174	87.1	200	2.17	
DRO >C28-C35	<25.0	25.0	08/07/2023	ND					
Total TPH C6-C35*	<25.0	25.0	08/07/2023	ND	331	82.8	400	1.74	

Surrogate: 1-Chlorooctane 91.1 % 44.9-134

Surrogate: 1-Chlorooctadecane 101 % 41.4-161

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:	08/02/2023	Sampling Date:	08/02/2023
Reported:	08/09/2023	Sampling Type:	Soil
Project Name:	ROJO 7811 27 FEDERAL COM 13H	Sampling Condition:	Cool & Intact
Project Number:	03C2012045	Sample Received By:	Tamara Oldaker
Project Location:	BTA		

**Sample ID: BH 04 .5' (H234093-07)**

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.025	0.025	08/08/2023	ND	2.08	104	2.00	2.45	
Toluene*	<0.050	0.050	08/08/2023	ND	1.99	99.7	2.00	2.50	
Ethylbenzene*	<0.050	0.050	08/08/2023	ND	2.02	101	2.00	1.57	
Total Xylenes*	<0.150	0.150	08/08/2023	ND	6.06	101	6.00	1.70	
Total BTEX	<0.275	0.275	08/08/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 101 % 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	08/07/2023	ND	432	108	400	0.00	

TPH TX1005		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C12	<25.0	25.0	08/07/2023	ND	154	77.2	200	1.31	
DRO >C12-C28	<25.0	25.0	08/07/2023	ND	174	87.1	200	2.17	
DRO >C28-C35	<25.0	25.0	08/07/2023	ND					
Total TPH C6-C35*	<25.0	25.0	08/07/2023	ND	331	82.8	400	1.74	

Surrogate: 1-Chlorooctane 89.3 % 44.9-134

Surrogate: 1-Chlorooctadecane 95.5 % 41.4-161

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:	08/02/2023	Sampling Date:	08/02/2023
Reported:	08/09/2023	Sampling Type:	Soil
Project Name:	ROJO 7811 27 FEDERAL COM 13H	Sampling Condition:	Cool & Intact
Project Number:	03C2012045	Sample Received By:	Tamara Oldaker
Project Location:	BTA		

**Sample ID: BH 04 C 3' (H234093-08)**

BTEx 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.025	0.025	08/08/2023	ND	2.08	104	2.00	2.45	
Toluene*	<0.050	0.050	08/08/2023	ND	1.99	99.7	2.00	2.50	
Ethylbenzene*	<0.050	0.050	08/08/2023	ND	2.02	101	2.00	1.57	
Total Xylenes*	<0.150	0.150	08/08/2023	ND	6.06	101	6.00	1.70	
Total BTEX	<0.275	0.275	08/08/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 103 % 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	48.0	16.0	08/07/2023	ND	432	108	400	0.00	

TPH TX1005		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C12	<25.0	25.0	08/07/2023	ND	154	77.2	200	1.31	
DRO >C12-C28	<25.0	25.0	08/07/2023	ND	174	87.1	200	2.17	
DRO >C28-C35	<25.0	25.0	08/07/2023	ND					
Total TPH C6-C35*	<25.0	25.0	08/07/2023	ND	331	82.8	400	1.74	

Surrogate: 1-Chlorooctane 98.6 % 44.9-134

Surrogate: 1-Chlorooctadecane 106 % 41.4-161

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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:	08/02/2023	Sampling Date:	08/02/2023
Reported:	08/09/2023	Sampling Type:	Soil
Project Name:	ROJO 7811 27 FEDERAL COM 13H	Sampling Condition:	Cool & Intact
Project Number:	03C2012045	Sample Received By:	Tamara Oldaker
Project Location:	BTA		

**Sample ID: BH 05 .5' (H234093-09)**

BTEX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.025	0.025	08/08/2023	ND	2.08	104	2.00	2.45		
Toluene*	<0.050	0.050	08/08/2023	ND	1.99	99.7	2.00	2.50		
Ethylbenzene*	<0.050	0.050	08/08/2023	ND	2.02	101	2.00	1.57		
Total Xylenes*	<0.150	0.150	08/08/2023	ND	6.06	101	6.00	1.70		
Total BTEX	<0.275	0.275	08/08/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 102 % 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	16.0	16.0	08/07/2023	ND	432	108	400	0.00		

TPH TX1005		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C12	<25.0	25.0	08/07/2023	ND	154	77.2	200	1.31	
DRO >C12-C28	<25.0	25.0	08/07/2023	ND	174	87.1	200	2.17	
DRO >C28-C35	<25.0	25.0	08/07/2023	ND					
Total TPH C6-C35*	<25.0	25.0	08/07/2023	ND	331	82.8	400	1.74	

Surrogate: 1-Chlorooctane 93.3 % 44.9-134

Surrogate: 1-Chlorooctadecane 99.4 % 41.4-161

Cardinal Laboratories

\*=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:	08/02/2023	Sampling Date:	08/02/2023
Reported:	08/09/2023	Sampling Type:	Soil
Project Name:	ROJO 7811 27 FEDERAL COM 13H	Sampling Condition:	Cool & Intact
Project Number:	03C2012045	Sample Received By:	Tamara Oldaker
Project Location:	BTA		

**Sample ID: BH 05 A 1' (H234093-10)**

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.025	0.025	08/08/2023	ND	2.08	104	2.00	2.45	
Toluene*	<0.050	0.050	08/08/2023	ND	1.99	99.7	2.00	2.50	
Ethylbenzene*	<0.050	0.050	08/08/2023	ND	2.02	101	2.00	1.57	
Total Xylenes*	<0.150	0.150	08/08/2023	ND	6.06	101	6.00	1.70	
Total BTEX	<0.275	0.275	08/08/2023	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	16.0	16.0	08/07/2023	ND	432	108	400	0.00	

TPH TX1005		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C12	<25.0	25.0	08/07/2023	ND	154	77.2	200	1.31	
DRO >C12-C28	<25.0	25.0	08/07/2023	ND	174	87.1	200	2.17	
DRO >C28-C35	<25.0	25.0	08/07/2023	ND					
Total TPH C6-C35*	<25.0	25.0	08/07/2023	ND	331	82.8	400	1.74	

Surrogate: 1-Chlorooctane 101 % 44.9-134

Surrogate: 1-Chlorooctadecane 108 % 41.4-161

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Celey D. Keene, Lab Director/Quality Manager



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### Notes and Definitions

BS-3	Blank spike recovery outside of lab established statistical limits, but still within method limits. Data is not adversely affected.
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 "Celey D. Keene".

---

Celey D. Keene, Lab Director/Quality Manager







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August 09, 2023

HADLIE GREEN

ENSOLUM, LLC

705 W WADLEY AVE.

MIDLAND, TX 79705

RE: ROJO 7811 27 FEDERAL COM 13H

Enclosed are the results of analyses for samples received by the laboratory on 08/02/23 15:25.

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".

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:	08/02/2023	Sampling Date:	08/02/2023
Reported:	08/09/2023	Sampling Type:	Soil
Project Name:	ROJO 7811 27 FEDERAL COM 13H	Sampling Condition:	Cool & Intact
Project Number:	03C2012045	Sample Received By:	Tamara Oldaker
Project Location:	BTA		

**Sample ID: SS 01 .5' (H234094-01)**

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.025	0.025	08/08/2023	ND	2.08	104	2.00	2.45	
Toluene*	<0.050	0.050	08/08/2023	ND	1.99	99.7	2.00	2.50	
Ethylbenzene*	<0.050	0.050	08/08/2023	ND	2.02	101	2.00	1.57	
Total Xylenes*	<0.150	0.150	08/08/2023	ND	6.06	101	6.00	1.70	
Total BTX	<0.275	0.275	08/08/2023	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	16.0	16.0	08/07/2023	ND	432	108	400	0.00	

TPH TX1005		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C12	<25.0	25.0	08/08/2023	ND	154	77.2	200	1.31	
DRO >C12-C28	<25.0	25.0	08/08/2023	ND	174	87.1	200	2.17	
DRO >C28-C35	<25.0	25.0	08/08/2023	ND					
Total TPH C6-C35*	<25.0	25.0	08/08/2023	ND	331	82.8	400	1.74	

Surrogate: 1-Chlorooctane 109 % 44.9-134

Surrogate: 1-Chlorooctadecane 117 % 41.4-161

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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:	08/02/2023	Sampling Date:	08/02/2023
Reported:	08/09/2023	Sampling Type:	Soil
Project Name:	ROJO 7811 27 FEDERAL COM 13H	Sampling Condition:	Cool & Intact
Project Number:	03C2012045	Sample Received By:	Tamara Oldaker
Project Location:	BTA		

**Sample ID: SS 02 .5' (H234094-02)**

BTEX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.025	0.025	08/08/2023	ND	2.08	104	2.00	2.45		
Toluene*	<0.050	0.050	08/08/2023	ND	1.99	99.7	2.00	2.50		
Ethylbenzene*	<0.050	0.050	08/08/2023	ND	2.02	101	2.00	1.57		
Total Xylenes*	<0.150	0.150	08/08/2023	ND	6.06	101	6.00	1.70		
Total BTEX	<0.275	0.275	08/08/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 104 % 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	16.0	16.0	08/07/2023	ND	432	108	400	0.00		

TPH TX1005		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C12	<25.0	25.0	08/08/2023	ND	154	77.2	200	1.31	
DRO >C12-C28	<25.0	25.0	08/08/2023	ND	174	87.1	200	2.17	
DRO >C28-C35	<25.0	25.0	08/08/2023	ND					
Total TPH C6-C35*	<25.0	25.0	08/08/2023	ND	331	82.8	400	1.74	

Surrogate: 1-Chlorooctane 99.2 % 44.9-134

Surrogate: 1-Chlorooctadecane 105 % 41.4-161

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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:	08/02/2023	Sampling Date:	08/02/2023
Reported:	08/09/2023	Sampling Type:	Soil
Project Name:	ROJO 7811 27 FEDERAL COM 13H	Sampling Condition:	Cool & Intact
Project Number:	03C2012045	Sample Received By:	Tamara Oldaker
Project Location:	BTA		

**Sample ID: SS 03 .5' (H234094-03)**

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.025	0.025	08/08/2023	ND	2.08	104	2.00	2.45	
Toluene*	<0.050	0.050	08/08/2023	ND	1.99	99.7	2.00	2.50	
Ethylbenzene*	<0.050	0.050	08/08/2023	ND	2.02	101	2.00	1.57	
Total Xylenes*	<0.150	0.150	08/08/2023	ND	6.06	101	6.00	1.70	
Total BTEX	<0.275	0.275	08/08/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 102 % 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	16.0	16.0	08/07/2023	ND	432	108	400	0.00	

TPH TX1005		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C12	<25.0	25.0	08/08/2023	ND	154	77.2	200	1.31	
DRO >C12-C28	<25.0	25.0	08/08/2023	ND	174	87.1	200	2.17	
DRO >C28-C35	<25.0	25.0	08/08/2023	ND					
Total TPH C6-C35*	<25.0	25.0	08/08/2023	ND	331	82.8	400	1.74	

Surrogate: 1-Chlorooctane 97.9 % 44.9-134

Surrogate: 1-Chlorooctadecane 106 % 41.4-161

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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:	08/02/2023	Sampling Date:	08/02/2023
Reported:	08/09/2023	Sampling Type:	Soil
Project Name:	ROJO 7811 27 FEDERAL COM 13H	Sampling Condition:	Cool & Intact
Project Number:	03C2012045	Sample Received By:	Tamara Oldaker
Project Location:	BTA		

**Sample ID: SS 04 .5' (H234094-04)**

BTEX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.025	0.025	08/08/2023	ND	2.08	104	2.00	2.45		
Toluene*	<0.050	0.050	08/08/2023	ND	1.99	99.7	2.00	2.50		
Ethylbenzene*	<0.050	0.050	08/08/2023	ND	2.02	101	2.00	1.57		
Total Xylenes*	<0.150	0.150	08/08/2023	ND	6.06	101	6.00	1.70		
Total BTEX	<0.275	0.275	08/08/2023	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	16.0	16.0	08/08/2023	ND	432	108	400	0.00		

TPH TX1005		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C12	<25.0	25.0	08/08/2023	ND	154	77.2	200	1.31	
DRO >C12-C28	<25.0	25.0	08/08/2023	ND	174	87.1	200	2.17	
DRO >C28-C35	<25.0	25.0	08/08/2023	ND					
Total TPH C6-C35*	<25.0	25.0	08/08/2023	ND	331	82.8	400	1.74	

Surrogate: 1-Chlorooctane 103 % 44.9-134

Surrogate: 1-Chlorooctadecane 112 % 41.4-161

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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:	08/02/2023	Sampling Date:	08/02/2023
Reported:	08/09/2023	Sampling Type:	Soil
Project Name:	ROJO 7811 27 FEDERAL COM 13H	Sampling Condition:	Cool & Intact
Project Number:	03C2012045	Sample Received By:	Tamara Oldaker
Project Location:	BTA		

**Sample ID: SS 05 .5' (H234094-05)**

BTEX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.025	0.025	08/08/2023	ND	2.20	110	2.00	1.05		
Toluene*	<0.050	0.050	08/08/2023	ND	2.10	105	2.00	1.54		
Ethylbenzene*	<0.050	0.050	08/08/2023	ND	1.98	99.2	2.00	1.76		
Total Xylenes*	<0.150	0.150	08/08/2023	ND	5.94	99.0	6.00	2.36		
Total BTEX	<0.275	0.275	08/08/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 93.0 % 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	16.0	16.0	08/08/2023	ND	432	108	400	0.00		

TPH TX1005		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C12	<25.0	25.0	08/08/2023	ND	154	77.2	200	1.31	
DRO >C12-C28	<25.0	25.0	08/08/2023	ND	174	87.1	200	2.17	
DRO >C28-C35	<25.0	25.0	08/08/2023	ND					
Total TPH C6-C35*	<25.0	25.0	08/08/2023	ND	331	82.8	400	1.74	

Surrogate: 1-Chlorooctane 101 % 44.9-134

Surrogate: 1-Chlorooctadecane 109 % 41.4-161

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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:	08/02/2023	Sampling Date:	08/02/2023
Reported:	08/09/2023	Sampling Type:	Soil
Project Name:	ROJO 7811 27 FEDERAL COM 13H	Sampling Condition:	Cool & Intact
Project Number:	03C2012045	Sample Received By:	Tamara Oldaker
Project Location:	BTA		

**Sample ID: SS 06 .5' (H234094-06)**

BTEX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.025	0.025	08/08/2023	ND	2.20	110	2.00	1.05		
Toluene*	<0.050	0.050	08/08/2023	ND	2.10	105	2.00	1.54		
Ethylbenzene*	<0.050	0.050	08/08/2023	ND	1.98	99.2	2.00	1.76		
Total Xylenes*	<0.150	0.150	08/08/2023	ND	5.94	99.0	6.00	2.36		
Total BTEX	<0.275	0.275	08/08/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 92.4 % 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	<16.0	16.0	08/08/2023	ND	432	108	400	0.00		

TPH TX1005		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C12	<25.0	25.0	08/08/2023	ND	154	77.2	200	1.31	
DRO >C12-C28	<25.0	25.0	08/08/2023	ND	174	87.1	200	2.17	
DRO >C28-C35	<25.0	25.0	08/08/2023	ND					
Total TPH C6-C35*	<25.0	25.0	08/08/2023	ND	331	82.8	400	1.74	

Surrogate: 1-Chlorooctane 107 % 44.9-134

Surrogate: 1-Chlorooctadecane 115 % 41.4-161

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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:	08/02/2023	Sampling Date:	08/02/2023
Reported:	08/09/2023	Sampling Type:	Soil
Project Name:	ROJO 7811 27 FEDERAL COM 13H	Sampling Condition:	Cool & Intact
Project Number:	03C2012045	Sample Received By:	Tamara Oldaker
Project Location:	BTA		

**Sample ID: SS 07 .5' (H234094-07)**

BTEX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.025	0.025	08/08/2023	ND	2.20	110	2.00	1.05		
Toluene*	<0.050	0.050	08/08/2023	ND	2.10	105	2.00	1.54		
Ethylbenzene*	<0.050	0.050	08/08/2023	ND	1.98	99.2	2.00	1.76		
Total Xylenes*	<0.150	0.150	08/08/2023	ND	5.94	99.0	6.00	2.36		
Total BTEX	<0.275	0.275	08/08/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 93.5 % 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	<16.0	16.0	08/08/2023	ND	432	108	400	0.00		

TPH TX1005		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C12	<25.0	25.0	08/08/2023	ND	154	77.2	200	1.31	
DRO >C12-C28	<25.0	25.0	08/08/2023	ND	174	87.1	200	2.17	
DRO >C28-C35	<25.0	25.0	08/08/2023	ND					
Total TPH C6-C35*	<25.0	25.0	08/08/2023	ND	331	82.8	400	1.74	

Surrogate: 1-Chlorooctane 105 % 44.9-134

Surrogate: 1-Chlorooctadecane 113 % 41.4-161

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Celey D. Keene, Lab Director/Quality Manager



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### Notes and Definitions

BS-3	Blank spike recovery outside of lab established statistical limits, but still within method limits. Data is not adversely affected.
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".

---

Celey D. Keene, Lab Director/Quality Manager

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

*Released to Imaging: 2/28/2024 3:59:42 PM*





## APPENDIX E

### NMOCD Notifications

---

**From:** [Velez, Nelson, EMNRD](#)  
**To:** [Hadlie Green](#)  
**Cc:** [Tacoma Morrissey](#); [Aimee Cole](#); [Maxwell, Ashley, EMNRD](#)  
**Subject:** Re: [EXTERNAL] BTA - Sampling Notification Variance - Rojo 10-13 Tank Battery (Incident Number NRM2022745673)  
**Date:** Friday, December 1, 2023 10:02:42 AM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[Outlook-z4szomdc.png](#)

---

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

Hadlie,

After reviewing, I now comprehend and approve your variance request.

Please keep a copy of this communication for inclusion within the appropriate report submittal.

Thanks again and have a safe day!

Regards,

**Nelson Velez** • Environmental Specialist - Adv  
Environmental Bureau | EMNRD - Oil Conservation Division  
1000 Rio Brazos Road | Aztec, NM 87410  
(505) 469-6146 | [nelson.velez@emnrd.nm.gov](mailto:nelson.velez@emnrd.nm.gov)  
<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Hadlie Green <[hgreen@ensolum.com](mailto:hgreen@ensolum.com)>  
**Sent:** Friday, December 1, 2023 8:49 AM  
**To:** Velez, Nelson, EMNRD <[Nelson.Velez@emnrd.nm.gov](mailto:Nelson.Velez@emnrd.nm.gov)>  
**Cc:** Tacoma Morrissey <[tmorrissey@ensolum.com](mailto:tmorrissey@ensolum.com)>; Aimee Cole <[acole@ensolum.com](mailto:acole@ensolum.com)>; Maxwell, Ashley, EMNRD <[Ashley.Maxwell@emnrd.nm.gov](mailto:Ashley.Maxwell@emnrd.nm.gov)>  
**Subject:** RE: [EXTERNAL] BTA - Sampling Notification Variance - Rojo 10-13 Tank Battery (Incident Number NRM2022745673)

Good morning Nelson,

Please see the attached table including the three delineation points within the NRM2022745673 release that occurred in August 2020. Boreholes BH01, BH02, and BH04 are within the release.

Please let me know if you have any questions or need any additional information.

Thank you,



**Hadlie Green**

Project Geologist

432-557-8895

hgreen@ensolum.com

**Ensolum, LLC**

in f t

---

**From:** Velez, Nelson, EMNRD <Nelson.Velez@emnrd.nm.gov>

**Sent:** Friday, December 1, 2023 9:44 AM

**To:** Hadlie Green <hgreen@ensolum.com>

**Cc:** Tacoma Morrissey <tmorrissey@ensolum.com>; Aimee Cole <acole@ensolum.com>; Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>

**Subject:** Re: [EXTERNAL] BTA - Sampling Notification Variance - Rojo 10-13 Tank Battery (Incident Number NRM2022745673)

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

Good morning Hadlie,

Thank you for your request. Please provide the lab analysis for the three (3) samples collected from the most recent release (NRM2022745673). Once verified, OCD will pronounce its determination toward the variance.

Please keep a copy of this communication for inclusion within the appropriate report submittal.

The OCD requires a copy of all correspondence relative to remedial activities be included in all proposals and/or final closure reports. Correspondence required to be included in reports may include, but not limited to, notifications for liner inspections, sample events, spill/release/fire, and request for time extensions or variances.

Regards,

**Nelson Velez** • Environmental Specialist - Adv  
Environmental Bureau | EMNRD - Oil Conservation Division  
1000 Rio Brazos Road | Aztec, NM 87410  
(505) 469-6146 | [nelson.velez@emnrd.nm.gov](mailto:nelson.velez@emnrd.nm.gov)  
<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Hadlie Green <[hgreen@ensolum.com](mailto:hgreen@ensolum.com)>

**Sent:** Thursday, November 30, 2023 4:29 PM

**To:** Velez, Nelson, EMNRD <[Nelson.Velez@emnrd.nm.gov](mailto:Nelson.Velez@emnrd.nm.gov)>

**Cc:** Tacoma Morrissey <[tmorrissey@ensolum.com](mailto:tmorrissey@ensolum.com)>; Aimee Cole <[acole@ensolum.com](mailto:acole@ensolum.com)>

**Subject:** [EXTERNAL] BTA - Sampling Notification Variance - Rojo 10-13 Tank Battery (Incident Number NRM2022745673)

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

Good afternoon Nelson,

I'd like to request a Sampling Notification Variance for a historical incident that occurred on August 12, 2020 at the BTA Oil Producers, LLC (BTA) Rojo 10-13 Tank Battery (Incident Number NRM2022745673: 32.10846, -103.55289). A hammer union on the water transfer line failed, resulting in the release of approximately 40 barrels (bbls) of produced water off pad. There were no free-standing fluids recovered.

Ensolum, on behalf of BTA, completed delineation activities for a separate historical incident that occurred on November 13, 2018 at the BTA Rojo 7811 27 Federal Com 13H (Incident Number NCH1834763224: 32.108100, -103.552960). A diesel transfer pump failed, resulting in the release of approximately 30 bbls of produced water off pad. There were no free-standing fluids recovered. Delineation activities confirmed the absence of impacted soil within the release extent and a Closure Request was submitted to the NMOCD on September 18, 2023 and was approved on September 19, 2023.

Upon further investigation of the Rojo 10-13 Tank Battery (Incident Number NRM2022745673; marked in blue in the below snippet) release, we determined that the release extent overlays the NCH1834763224 release extent previously approved and closed. I'd like to submit a Closure Request for the NRM2022745673 release using the same data collected for Incident NCH1834763224. The NMOCD notifications submitted were for the NCH1834763224 release and I would like to request a variance to use these same confirmation samples and notifications for the NRM2022745673 release.

Please let me know if you have any questions or need any additional information.



Thank you,



**Hadlie Green**

Project Geologist

432-557-8895

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

Ensolum, LLC

in f  



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	NRM2022745673
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party: <b>BTA Oil Producers, LLC</b>	OGRID: <b>260297</b>
Contact Name: <b>Bob Hall</b>	Contact Telephone: <b>432-682-3753</b>
Contact email: <b>bhall@btaoil.com</b>	Incident # (assigned by OCD)
Contact mailing address: <b>104 S. Pecos St., Midland, TX 79701</b>	

### Location of Release Source

Latitude: **32.10846°** Longitude: **-103.55289°**

(NAD 83 in decimal degrees to 5 decimal places)

Site Name: <b>Rojo 10-13 Tank Battery</b>	Site Type: <b>Tank Battery</b>
Date Release Discovered: <b>8/12/2020</b>	API# (if applicable) Nearest well: <b>Rojo 7811 27 Federal Com #13H</b> <b>API #30-025-44296</b>

Unit Letter	Section	Township	Range	County
<b>B A</b>	<b>27</b>	<b>25S</b>	<b>33E</b>	<b>Lea</b>

**NOT ACCEPTED**

Surface Owner: ☒ State ☐ Federal ☐ Tribal ☒ Private (Name: **KAML Limited**)

### Nature and Volume of Release

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

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) <b>40 BBL</b>	Volume Recovered (bbls) <b>0 BBL</b>
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

**A hammer union (located outside of secondary containment) on the water transfer line failed, allowing produced water to be released outside of the secondary containment of the battery. Please note – the field foreman provided an estimate of the volume released as 40 BBL of produced water, no recovery. There has been a delay in getting an aerial photo of the wetted area to use for a calculation as it approaches the end of the 24-hour required notification period. I will make that part of the subsequent report for the assessment and clean-up of the release.**

Incident ID	NRM2022745673
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?  <b>The spill volume was greater than 25 BBL, which the NMOCD Rules define as a major release.</b>
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? <b>Notice is provided within 24 hours of discovery by the filing of this C-141 Report and distribution via email to NMOCD personnel: Mike Bratcher, Robert Hamlet, Victoria Venegas, and Jim Griswold.</b>	

### Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped.	
<input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment.	
<input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.	
<input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:          	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
Printed Name: <b>Bob Hall</b> Title: <b>Environmental Manager</b>	
Signature: 	Date: <b>8/13/2020</b>
email: <b>bhall@btaoil.com</b>	Telephone: <b>432-682-3753</b>
<b>OCD Only</b>	
Received by: <b>Ramona Marcus</b>	Date: <b>8/14/2020</b> <b>NOT ACCEPTED</b>

Incident ID	NRM2022745673
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.

State of New Mexico  
Oil Conservation Division

Page 4

Incident ID	NRM2022745673
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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: 12/6/2023

email: KBeaird@btaoil.com

Telephone: 432-312-2203

**OCD Only**

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

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

Incident ID	NRM2022745673
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 Beaird

Title: Environmental Manager

Signature: 

Date: 12/6/2023

email: KBeaird@btaoil.com

Telephone: 432-312-2203

### OCD Only

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

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

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

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

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

Title: \_\_\_\_\_

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

QUESTIONS

Action 294574

**QUESTIONS**

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:	260297
	Action Number:	294574
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Prerequisites</b>	
Incident ID (n#)	nRM2022745673
Incident Name	NRM2022745673 ROJO 10-13 TANK BATTERY @ 30-025-44296
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Well	[30-025-44296] ROJO 7811 27 FEDERAL COM #013H

<b>Location of Release Source</b>	
Please answer all the questions in this group.	
Site Name	ROJO 10-13 TANK BATTERY
Date Release Discovered	08/12/2020
Surface Owner	State

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

<b>Nature and Volume of Release</b>	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Equipment Failure   Other (Specify)   Produced Water   Released: 40 BBL   Recovered: 0 BBL   Lost: 40 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.



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QUESTIONS, Page 2

Action 294574

**QUESTIONS (continued)**

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:	260297
	Action Number:	294574
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

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

**Initial Response**

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

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

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

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

I hereby agree and sign off to the above statement	Name: BTA ENSOLUM Title: Environmental Manager Email: kbeaird@btaoil.com Date: 12/14/2023
--	--

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QUESTIONS, Page 3

Action 294574

**QUESTIONS (continued)**

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:	260297
	Action Number:	294574
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS****Site Characterization**

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Between 500 and 1000 (ft.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between ½ and 1 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between ½ and 1 (mi.)
Any other fresh water well or spring	Between ½ and 1 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between ½ and 1 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Between 1 and 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

**Remediation Plan**

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

Requesting a remediation plan approval with this submission	Yes
---	-----

Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.

Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No

**Soil Contamination Sampling:** (Provide the highest observable value for each, in milligrams per kilograms.)

Chloride (EPA 300.0 or SM4500 Cl B)	320
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	0
GRO+DRO (EPA SW-846 Method 8015M)	0
BTEX (EPA SW-846 Method 8021B or 8260B)	0
Benzene (EPA SW-846 Method 8021B or 8260B)	0

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.

On what estimated date will the remediation commence	08/01/2023
On what date will (or did) the final sampling or liner inspection occur	08/02/2023
On what date will (or was) the remediation complete(d)	08/02/2023
What is the estimated surface area (in square feet) that will be reclaimed	0
What is the estimated volume (in cubic yards) that will be reclaimed	0
What is the estimated surface area (in square feet) that will be remediated	0
What is the estimated volume (in cubic yards) that will be remediated	0

These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 4

Action 294574

**QUESTIONS (continued)**

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:	260297
	Action Number:	294574
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Remediation Plan (continued)</b>	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
<b>This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:</b>	
<i>(Select all answers below that apply.)</i>	
(Ex Situ) Excavation and <b>off-site</b> disposal (i.e. dig and haul, hydrovac, etc.)	No
(Ex Situ) Excavation and <b>on-site</b> remediation (i.e. On-Site Land Farms)	No
(In Situ) Soil Vapor Extraction	No
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	No
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	No
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	No
Ground Water Abatement pursuant to 19.15.30 NMAC	No
OTHER (Non-listed remedial process)	Yes
Other Non-listed Remedial Process. Please specify	Delineation only, no impacted soil identified
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
I hereby agree and sign off to the above statement	Name: BTA ENSOLUM Title: Environmental Manager Email: kbeaird@btaoil.com Date: 12/14/2023
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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Action 294574

**QUESTIONS (continued)**

Operator:  BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:	260297
	Action Number:	294574
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Deferral Requests Only</b>	
Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

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QUESTIONS, Page 6

Action 294574

**QUESTIONS (continued)**

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:
	260297
	Action Number:
	294574
Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

**QUESTIONS**

Sampling Event Information	
Last sampling notification (C-141N) recorded	294566
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	08/01/2023
What was the (estimated) number of samples that were to be gathered	17
What was the sampling surface area in square feet	2389

**Remediation Closure Request**

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

Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No
All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion	Yes
What was the total surface area (in square feet) remediated	0
What was the total volume (cubic yards) remediated	0
All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX, and 10 mg/kg Benzene	Yes
What was the total surface area (in square feet) reclaimed	0
What was the total volume (in cubic yards) reclaimed	0
Summarize any additional remediation activities not included by answers (above)	delineation only; no impacted soil identified

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

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

I hereby agree and sign off to the above statement	Name: BTA ENSOLUM Title: Environmental Manager Email: kbeaird@btaoil.com Date: 12/14/2023
--	--

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Action 294574

**QUESTIONS (continued)**

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 294574
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Reclamation Report</b>	
<i>Only answer the questions in this group if all reclamation steps have been completed.</i>	
Requesting a reclamation approval with this submission	No



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CONDITIONS  
  
Action 294574

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 294574
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
scwells	None	2/28/2024