



September 5, 2024

New Mexico Oil Conservation Division

New Mexico Energy, Minerals, and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**Re: Reclamation Report
Harroun East Tank Battery
Incident Number NAPP2204151142
Lea County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of BTA Oil Producers, LLC (BTA), has prepared the following *Reclamation Report* for the Harroun East Tank Battery (Site). This *Reclamation Report* documents the Site history and reclamation activities completed to date.

BACKGROUND

The Site is located in Unit O, Section 20, Township 23 South, Range 29 East, in Eddy County, New Mexico (32.28584°, -104.00593°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM).

On February 9, 2022, an equipment malfunction caused approximately 1 barrel (bbl) of crude oil to be sent to the flare. The crude oil ignited and the soot from the burned oil fell in the vicinity of the flare stack. BTA reported the release immediately to the New Mexico Oil Conservation Division (NMOCD) via email and submitted a Release Notification Form C-141 (Form C-141) on February 21, 2022. The release was assigned Incident Number NAPP2204151142.

Delineation and excavation of impacted soil was completed at the Site between May 2023 and October 2023. Based on the delineation and excavation soil sample analytical results, a *Closure Request* was submitted to the NMOCD on December 20, 2023. The NMOCD approved the *Closure Request* on February 21, 2024. Additional details regarding the release, Site Characterization, delineation and excavation activities, and soil sample analytical results can be referenced in the approved *Closure Request*. Remediation of the release was completed in accordance with Title 19, Chapter 15, Part 29, (19.15.29) of the New Mexico Administrative Code (NMAC).

RECLAMATION ACTIVITIES

The excavation area measured approximately 770 square feet. A total of 40 cubic yards of impacted and waste-containing soil were removed during excavation activities. Upon completion of excavation activities and receipt of final laboratory analytical results, the excavation was backfilled and restored to its original condition. The excavation was backfilled with caliche. Following backfill activities, the disturbed area was graded and contoured to match the surrounding topography. Since the release remained on the active well pad, revegetation is not required at this time. Removal of pad caliche, reseeding, and revegetation activities will be completed during pad abandonment. The excavation extent

BTA Oil Producers, LLC
Reclamation Report
Harroun East Tank Battery

and reclamation area are shown on the attached Figure 1. Photographic documentation is included in Appendix A.

One representative 5-point composite sample (BF01) was collected from the backfilled material on June 10, 2024. The backfill soil sample was transported under strict chain-of-custody procedures to Cardinal Laboratories in Carlsbad, New Mexico, for analysis of the following constituents of concern (COCs): benzene, toluene, ethylbenzene, and total xylenes (BTEX) following United States Environmental Protection Agency (EPA) Method 8021B; total petroleum hydrocarbons (TPH)—gasoline range organics (GRO), TPH-diesel range organics (DRO), and TPH-oil range organics (ORO) following EPA Method 8015M/D; and chloride following EPA Method 4500.

Laboratory analytical results for the backfill soil sample confirmed compliance with NMOCD requirements for the reclaimed area to contain non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 milligrams per kilogram (mg/kg) and TPH concentrations less than 100 mg/kg. The laboratory analytical results are summarized in the attached Table 1 and the complete laboratory analytical report is included as Appendix B.

RECLAMATION APPROVAL REQUEST

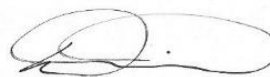
Based on the reclamation activities completed to date, BTA respectfully requests approval of this *Reclamation Report* and a status update to *Incident Closure Approved* for Incident NAPP2204151142.

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

Sincerely,
Ensolum, LLC



Hadlie Green
Project Geologist



Daniel R. Moir, PG (licensed in WY & TX)
Senior Managing Geologist

cc: Ray Ramos, BTA
Bureau of Land Management

Appendices:

Figure 1	Excavation Extent / Reclamation Area
Table 1	Backfill Soil Sample Analytical Results
Appendix A	Photographic Log
Appendix B	Laboratory Analytical Report & Chain of Custody Documentation



FIGURES

Document Path: C:\Users\Peter.Rodriguez\OneDrive - ENSOLUM, LLC\Desktop\PAR_GIS\File Path Structure3 - Carlsbad\BTA Oil Producers, LLC\03C2012036 - Harroun East Tank Battery - Flare.aprx



Excavation Extent / Reclamation Area

BTA Oil Producers, LLC
Harroun East Tank Battery
Incident Number: nAPP2204151142
Unit O, Section 34, T23S, Range 29E
Eddy County, New Mexico

FIGURE
1



TABLES



TABLE 1 BACKFILL SOIL SAMPLE ANALYTICAL RESULTS Harroun East Tank Battery BTA Oil Producers, LLC Eddy County, New Mexico										
Sample I.D.	Sample Date	Sample Depth (feet bgs)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)	TPH ORO (mg/kg)	GRO+DRO (mg/kg)	Total TPH (mg/kg)	Chloride (mg/kg)
NMOCD Table I Closure Criteria (NMAC 19.15.29)			10	50	NE	NE	NE	NE	100	600
Backfill Soil Sample										
BF01	07/15/2024	N/A	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	432

Notes:

bgs: below ground surface

mg/kg: milligrams per kilogram

NMOCD: New Mexico Oil Conservation Division

NMAC: New Mexico Administrative Code

NE: Not Established

N/A: Not Applicable

BTEX: Benzene, Toluene, Ethylbenzene, and Xylenes

GRO: Gasoline Range Organics

DRO: Diesel Range Organics

ORO: Oil Range Organics

TPH: Total Petroleum Hydrocarbon



APPENDIX A

Photographic Log

**Photographic Log**

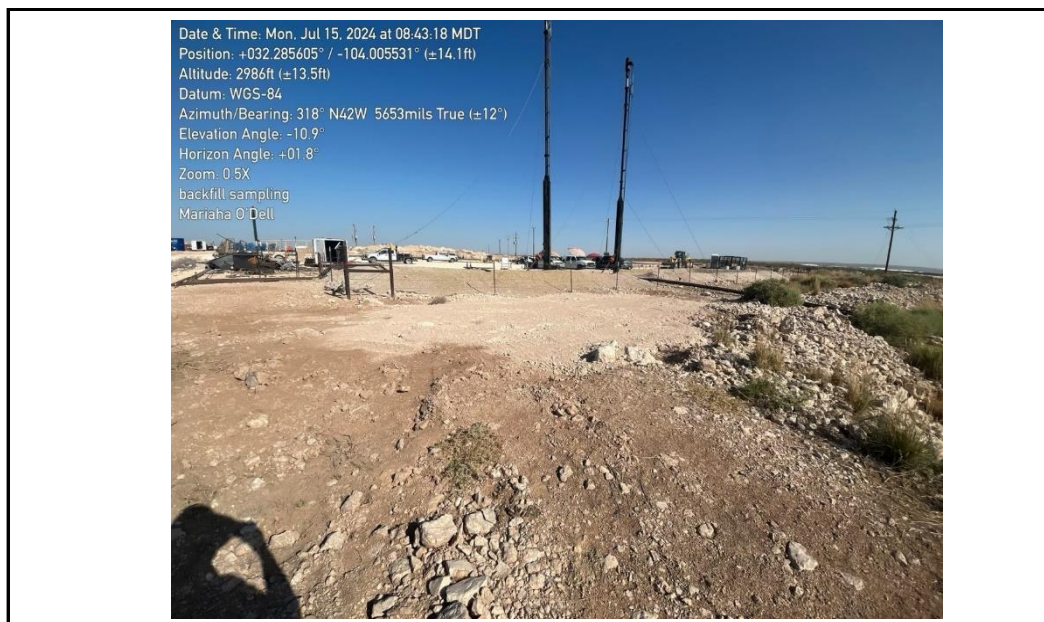
BTA Oil Producers, LLC
Harroun East Tank Battery
Incident Number NAPP2204151142



Photograph 1

Date: July 15, 2024

Description: View of backfilled excavation, facing northwest.



Photograph 2

Date: July 15, 2024

Description: View of backfilled excavation, facing northwest.



APPENDIX B

Laboratory Analytical Report & Chain of Custody Documentation



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

July 18, 2024

HADLIE GREEN

ENSOLUM, LLC

705 W WADLEY AVE.

MIDLAND, TX 79705

RE: HARROUN EAST TANK BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 07/15/24 14:27.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. 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.

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: 07/15/2024
 Reported: 07/18/2024
 Project Name: HARROUN EAST TANK BATTERY
 Project Number: 03C2012036
 Project Location: BTA 32.285675,-104.005592

Sampling Date: 07/15/2024
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: BF 01 (H244203-01)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/16/2024	ND	2.00	99.8	2.00	0.859	
Toluene*	<0.050	0.050	07/16/2024	ND	1.89	94.7	2.00	0.688	
Ethylbenzene*	<0.050	0.050	07/16/2024	ND	1.90	94.9	2.00	2.14	
Total Xylenes*	<0.150	0.150	07/16/2024	ND	5.61	93.4	6.00	2.51	
Total BTEX	<0.300	0.300	07/16/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 110 % 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	432	16.0	07/16/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	07/16/2024	ND	205	102	200	4.76	
DRO >C10-C28*	<10.0	10.0	07/16/2024	ND	196	98.2	200	2.44	
EXT DRO >C28-C36	<10.0	10.0	07/16/2024	ND					

Surrogate: 1-Chlorooctane 87.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 94.3 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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

Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
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

Cardinal Laboratories

*=Accredited Analyte

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A handwritten signature in black ink, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager



101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: Ensolum, LLC

Project Manager: Hadlie Green

Address: 1001 N Marientfeld St #400

City: Midland

State: TX Zip: 79701

Phone #: 432-557-8895 Fax #:

Project #: 03C2012030 Project Owner:

Project Name: Haroun East Tank Battery

Project Location: 32.285075, -104.005592

Sampler Name:

BILL TO

ANALYSIS REQUEST

P.O. #:

Company: BTA Oil Producers

Attn: Ray Ramos

Address: 104 S Pecos St

City: Midland

State: TX Zip: 79701

Phone #:

Fax #:

FOR LAB USE ONLY

Lab I.D.

Sample I.D.

Depth
(feet)

BF01

(G)RAB OR (C)OMP.

CONTAINERS

GROUNDWATER

WASTEWATER

SOIL

OIL

SLUDGE

OTHER :

ACID/BASE:

ICE / COOL

OTHER :

DATE

TIME

Chlorides

BTEX

TPH

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Relinquished By:

Date: 7/14/24

Received By:

Verbal Result: ☐ Yes ☒ No

Add'l Phone #:

All Results are emailed. Please provide Email address:

Relinquished By:

Date: 7/14/24

Received By:

Remarks: Incident # : NAD0220451142

Delivered By: (Circle One)

Sampler - UPS - Bus - Other:

Onserved Temp. °C: 29

Sample Condition: ☒ Cool ☐ Intact

CHECKED BY: (Initials)

Turnaround Time: 5 days

Standard Rush

Bacteria (only) Sample Condition

Cool Inlet

Observed Temp. °C

Corrected Temp. °C

† Cardinal cannot accept verbal changes. Please email changes to caley.tee@cardinallabsnm.com

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
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1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 380900

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 380900
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2204151142
Incident Name	NAPP2204151142 HARROUN RANCH EAST TANK BATTERY @ 0
Incident Type	Oil Release
Incident Status	Reclamation Report Received
Incident Facility	[fAPP2129830694] Harroun Ranch East

Location of Release Source	
Please answer all the questions in this group.	
Site Name	HARROUN RANCH EAST TANK BATTERY
Date Release Discovered	02/09/2022
Surface Owner	Federal

Incident Details	
Please answer all the questions in this group.	
Incident Type	Oil Release
Did this release result in a fire or is the result of a fire	Yes
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

Nature and Volume of Release	
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	Cause: Overflow - Tank, Pit, Etc. Separator Crude Oil Released: 1 BBL Recovered: 1 BBL Lost: 0 BBL.
Produced Water Released (bbls) Details	Not answered.
Is the concentration of chloride in the produced water >10,000 mg/l	No
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)	Malfunction of supply gas line to pneumatic controller caused oil dump to malfunction, pushing oil out of the separator and to the flare line where the oil ignited and burned up at the flare stack. The soot from the burned oil fell in the vicinity of the flare stack.

District I

1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720

District II

811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720

District III

1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170

District IV

1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS, Page 2

Action 380900

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:	260297
	Action Number:	380900
	Action Type:	[C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	More info needed to determine if this will be treated as 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: (2) an unauthorized release of a volume that: (a) results in a fire or is the result of a fire.
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: 12/20/2023
--	--

District I

1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720

District II

811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720

District III

1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170

District IV

1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS, Page 3

Action 380900

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:
	260297
	Action Number:
	380900
Action Type:	
[C-141] Reclamation Report C-141 (C-141-v-Reclamation)	

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)	Less than or equal 25 (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
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
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 500 and 1000 (ft.)
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	Between 1 and 5 (mi.)
An (non-karst) unstable area	Between 1 and 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Medium
A 100-year floodplain	Between 1000 (ft.) and ½ (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)	5600
TPH (GRO+DRO+MRO)	(EPA SW-846 Method 8015M)	27770
GRO+DRO	(EPA SW-846 Method 8015M)	22900
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	05/08/2023
On what date will (or did) the final sampling or liner inspection occur	12/01/2023
On what date will (or was) the remediation complete(d)	12/01/2023
What is the estimated surface area (in square feet) that will be reclaimed	770
What is the estimated volume (in cubic yards) that will be reclaimed	40
What is the estimated surface area (in square feet) that will be remediated	770
What is the estimated volume (in cubic yards) that will be remediated	40

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.

District I

1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720

District II

811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720

District III

1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170

District IV

1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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QUESTIONS, Page 4

Action 380900

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:	260297
	Action Number:	380900
	Action Type:	[C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

Remediation Plan (continued)	
<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>	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
<i>(Select all answers below that apply.)</i>	
(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for off-site disposal	LEA LAND LANDFILL [fEEM0112342028]
OR which OCD approved well (API) will be used for off-site disposal	Not answered.
OR is the off-site disposal site, to be used, out-of-state	No
OR is the off-site disposal site, to be used, an NMED facility	No
(Ex Situ) Excavation and on-site 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)	No
<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: 12/20/2023
<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>	

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
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District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS, Page 5

Action 380900

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 380900
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

Deferral Requests Only	
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 380900

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:
	260297
	Action Number:
	380900
Action Type:	
[C-141] Reclamation Report C-141 (C-141-v-Reclamation)	

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	296551
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	12/01/2023
What was the (estimated) number of samples that were to be gathered	5
What was the sampling surface area in square feet	1442

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	770
What was the total volume (cubic yards) remediated	40
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	770
What was the total volume (in cubic yards) reclaimed	40
Summarize any additional remediation activities not included by answers (above)	All impacted soil has been excavated to the most stringent criteria and backfilled with non-waste containing soil

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: 12/20/2023
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QUESTIONS, Page 7

Action 380900

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:	260297
	Action Number:	380900
	Action Type:	[C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

Reclamation Report	
<i>Only answer the questions in this group if all reclamation steps have been completed.</i>	
Requesting a reclamation approval with this submission	Yes
What was the total reclamation surface area (in square feet) for this site	770
What was the total volume of replacement material (in cubic yards) for this site	40
<i>Per Paragraph (1) of Subsection D of 19.15.29.13 NMAC the reclamation must contain a minimum of four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, or other test methods approved by the division. The soil cover must include a top layer, which is either the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater.</i>	
Is the soil top layer complete and is it suitable material to establish vegetation	Yes
On what (estimated) date will (or was) the reseeding commence(d)	07/12/2024
Summarize any additional reclamation activities not included by answers (above)	Following backfill activities, the disturbed area was graded and contoured to match the surrounding topography. Since the release remained on the active well pad, revegetation is not required at this time. Removal of pad caliche, reseeding, and revegetation activities will be completed during pad abandonment.
<i>The responsible party must attach information demonstrating they have complied with all applicable reclamation requirements and any conditions or directives of the OCD. This demonstration should be in the form of attachments (in .pdf format) including a scaled site map, any proposed reseeding plans or relevant field notes, photographs of reclaimed area, and a narrative of the reclamation activities. Refer to 19.15.29.13 NMAC.</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. 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: rramos@btaoil.com Date: 09/05/2024

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QUESTIONS, Page 8

Action 380900

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:
	260297
	Action Number:
	380900
Action Type:	
[C-141] Reclamation Report C-141 (C-141-v-Reclamation)	

QUESTIONS

Revegetation Report	
Only answer the questions in this group if all surface restoration, reclamation and re-vegetation obligations have been satisfied.	
Requesting a restoration complete approval with this submission	No
Per Paragraph (4) of Subsection (D) of 19.15.29.13 NMAC for any major or minor release containing liquids, the responsible party must notify the division when reclamation and re-vegetation are complete.	

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CONDITIONS

Action 380900

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:
	260297
	Action Number:
	380900
Action Type:	
[C-141] Reclamation Report C-141 (C-141-v-Reclamation)	

CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	The reclamation report is approved. All revegetation activities will need to be documented and included in the revegetation report. The revegetation report will need to include: An executive summary of the revegetation activities including: Seed mix, Method of seeding, dates of when the release area was reseeded, information pertinent to inspections, information about any amendments added to the soil, information on how the vegetative cover established meets the life-form ratio of plus or minus fifty percent of pre-disturbance levels and a total percent plant cover of at least seventy percent of pre-disturbance levels, excluding noxious weeds per 19.15.29.13 D.(3) NMAC, and any additional information; a scaled Site Map including area that was revegetated in square feet; and pictures of the revegetated areas during reseeding activities, inspections, and final pictures when revegetation is achieved.	9/16/2024