



October 15, 2024

District Supervisor
Oil Conservation Division, District 2
811 S. First St.
Artesia, New Mexico 88210

**Re: Liner Inspection and Closure Request
BTA Oil Producers, LLC
Vacuum SWD H #35 Release
Unit H, Section 35, Township 17 South, Range 35 East
Lea County, New Mexico
Incident ID# nAPP2426446424**

Sir or Madam:

BTA Oil Producers, LLC (BTA) contracted Tetra Tech, Inc. (Tetra Tech) to assess and evaluate a release that occurred due to a suction hose being inadvertently removed from a produced water tank. The release footprint is located within Public Land Survey System (PLSS) Unit Letter H, Section 35, Township 17 South, Range 35 East, in Lea County, New Mexico (Site). The approximate release point occurred at coordinates 32.792493°, -103.422879°, as shown on Figure 1 and Figure 2. This release is located on State Trust Lands managed by the NMSLO.

BACKGROUND

On September 18, 2024, a release was discovered at the Vacuum SWD H #35 Tank Battery. The cause of the release is indicated in the NOR as due to a suction hose being removed from a produced water tank. Photographs provided by BTA indicate that the release footprint was limited to the lined containment area, as presented in Figure 3. The release was reported as approximately 26.7 barrels (bbls) of produced water, of which all fluids were recovered. A Notification of Release (NOR) was submitted to the New Mexico Oil Conservation Division (NMOCD) online portal system. Following the NOR submittal the release was assigned the Incident ID nAPP2426446424. The NMOCD initial C-141 Initial Report was duly submitted via the NMOCD online portal system within the required timeframe. A copy of the NMOCD initial C-141 and NOR are included in Appendix A.

SITE CHARACTERIZATION

A site characterization was performed in accordance with 19.15.29.11 New Mexico State Administrative Code (NMAC) and the guidance document Process Updates re: Submissions of Form C-141 Release Notification and Corrective Actions (12/01/2023).

A summary of the site characterization is presented below:

Shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (feet bgs)	> 50 feet bgs
Method used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water?	No

Tetra Tech

901 West Wall St., Suite 100, Midland, TX 79701

Tel 432.682.4559

Fax 432.682.3946

www.tetratech.com

Liner Inspection and Closure Request
October 15, 2024

BTA Oil Producers, LLC

<u>The minimum distance between the closest lateral extents of the release and the following surface areas:</u>	
A continuously flowing watercourse or any other significant watercourse	0.08 miles
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	0.63 miles
An occupied permanent residence, school, hospital, institution, or church	> 5 miles
A spring or private domestic fresh water well used by less than five households for domestic or stock watering purposes	0.44 miles
Any other fresh water well or spring	0.74 miles
Incorporated municipal boundaries or a defined municipal fresh water well field	> 5 miles
A wetland	0.02 miles
A subsurface mine	> 5 miles
A (non-karst) unstable area	>5 miles
Categorized risk of this well / site being in a karst geology	Low
A 100-year floodplain	>5 miles
Did the release impact areas not on an exploration, development, production, or storage site?	No

According to the New Mexico Office of the State Engineers (NMOSE) reporting system, there are no groundwater well records within ½ mile (800 meters) of the Site. The site characterization data are presented in Appendix B.

REGULATORY FRAMEWORK

The regulatory framework is based upon the release footprint as contained completely within a lined secondary containment structure and in accordance with Subsection A(5)(a) of 19.15.29.11 NMAC. If the release occurred within a lined containment area, the responsible party must demonstrate liner integrity after the affected material is removed, expose the affected area of the liner, and provide the following:

- Certification on Form C-141 that the responsible party has visually inspected the liner where the release occurred, and the liner remains intact and had the ability to contain the leak in question; and
- Notification to the appropriate division district office at least two business days before conducting the liner inspection.

LINER INTEGRITY

Prior to the liner inspection, the facility was power washed, thus, the integrity of the liner could be inspected and confirmed clean. In accordance with 19.15.29.11(A)(5)(a) NMAC, notification of a liner inspection at the Vacuum SWD H #35 was submitted via the NMOC portal on September 24, 2024. The liner inspection notification email is included in Appendix C.

On September 27, 2024, Tetra Tech personnel performed an inspection of the liner within the containment area of the Vacuum SWD H #35 Battery. This work was completed to verify the integrity of the liner. The liner was observed to underlie the entirety of the tank battery containment area. The liner was intact with no visible rips or tears and encompassed by an approximately 2-foot-tall muscle wall. The liner was

Liner Inspection and Closure Request
October 15, 2024

BTA Oil Producers, LLC

anchored on the interior. At the time of the inspection, the liner was intact and had the ability to contain the documented release. Photographic documentation of the liner inspection is included in Appendix D.

CONCLUSION

Based on the results of the liner inspection, BTA respectfully requests closure of the subject line incident. The release occurred within a lined containment area. The liner integrity demonstration is complete. The affected area of the liner has been visually inspected where the release occurred, and the liner remains intact and had the ability to contain the leak in question. Two business days' notice (C-141N) was provided to the appropriate division district office before conducting the liner inspection.

The final C-141 forms are enclosed in Appendix A. If you have any questions concerning the liner inspection for the Site, please call me at (512) 560-9064 or Christian at (512) 338-2861.

Sincerely,

Tetra Tech, Inc.



Nicholas M. Poole, G.I.T.
Project Manager



Christian M. Llull, P.G.
Program Manager

cc:

Mr. Ray Ramos, BTA Oil Producers, LLC
ECO, c/o Tami Knight, NMSLO

Liner Inspection and Closure Request
October 15, 2024

BTA Oil Producers, LLC

LIST OF ATTACHMENTS

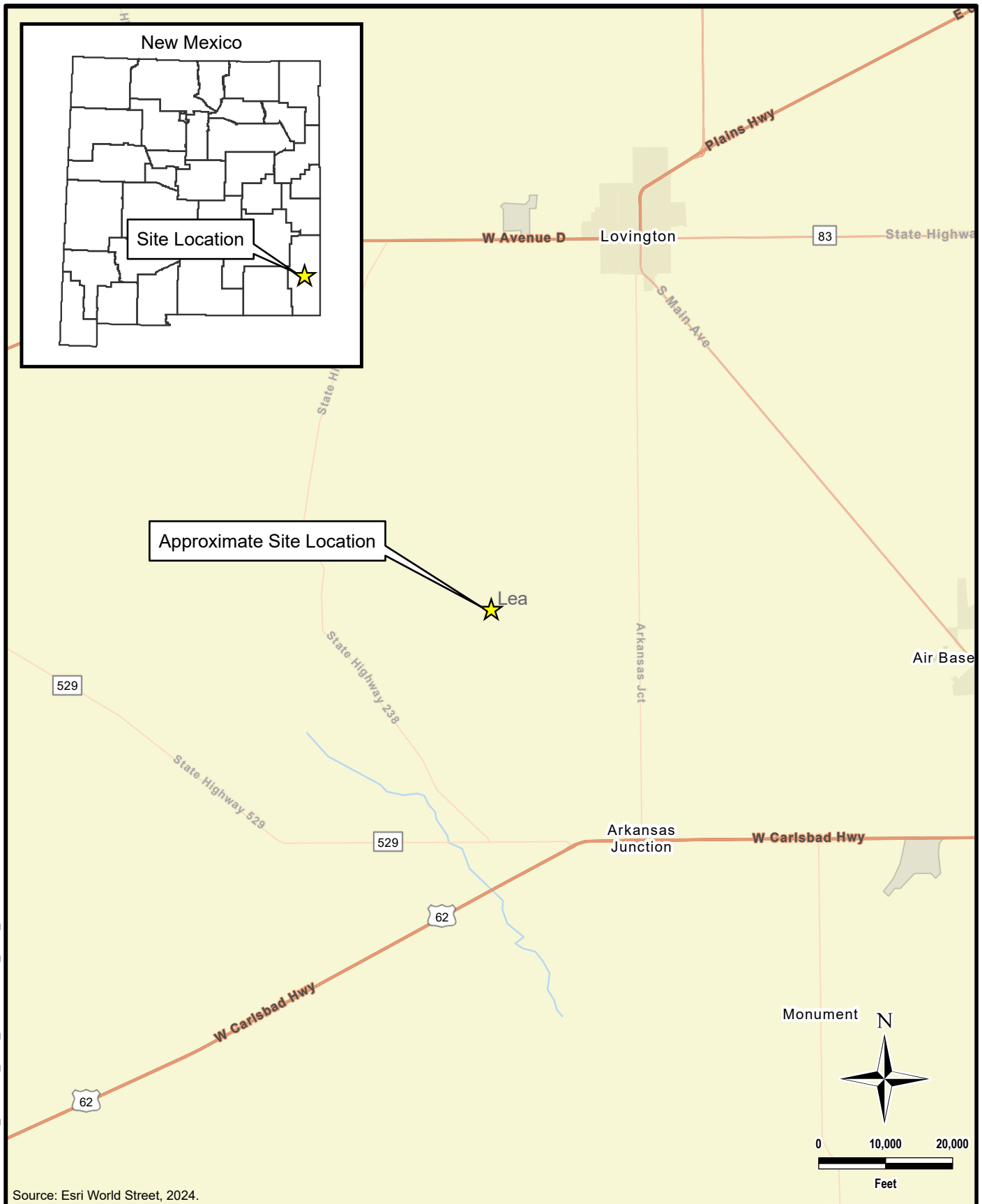
Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Approximate Release Extent and Liner Inspection

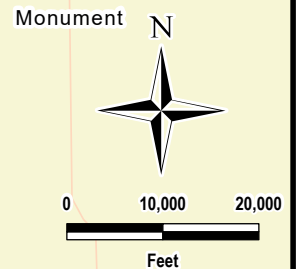
Appendices:

- Appendix A – C-141 Forms
- Appendix B – Site Characterization Data
- Appendix C – Regulatory Correspondence
- Appendix D – Photographic Documentation

FIGURES



Source: Esri World Street, 2024.



TETRA TECH

www.tetrattech.com

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Midland, Texas 79701
Phone: (432) 682-4559
Fax: (432) 682-3946

BTA OIL PRODUCERS, LLC

NAPP2426446424
(32.792408°, -103.422927°)
LEA COUNTY, NEW MEXICO

**VACUUM SWD H #35
OVERVIEW MAP**

PROJECT NO.: 212C-MD-03641

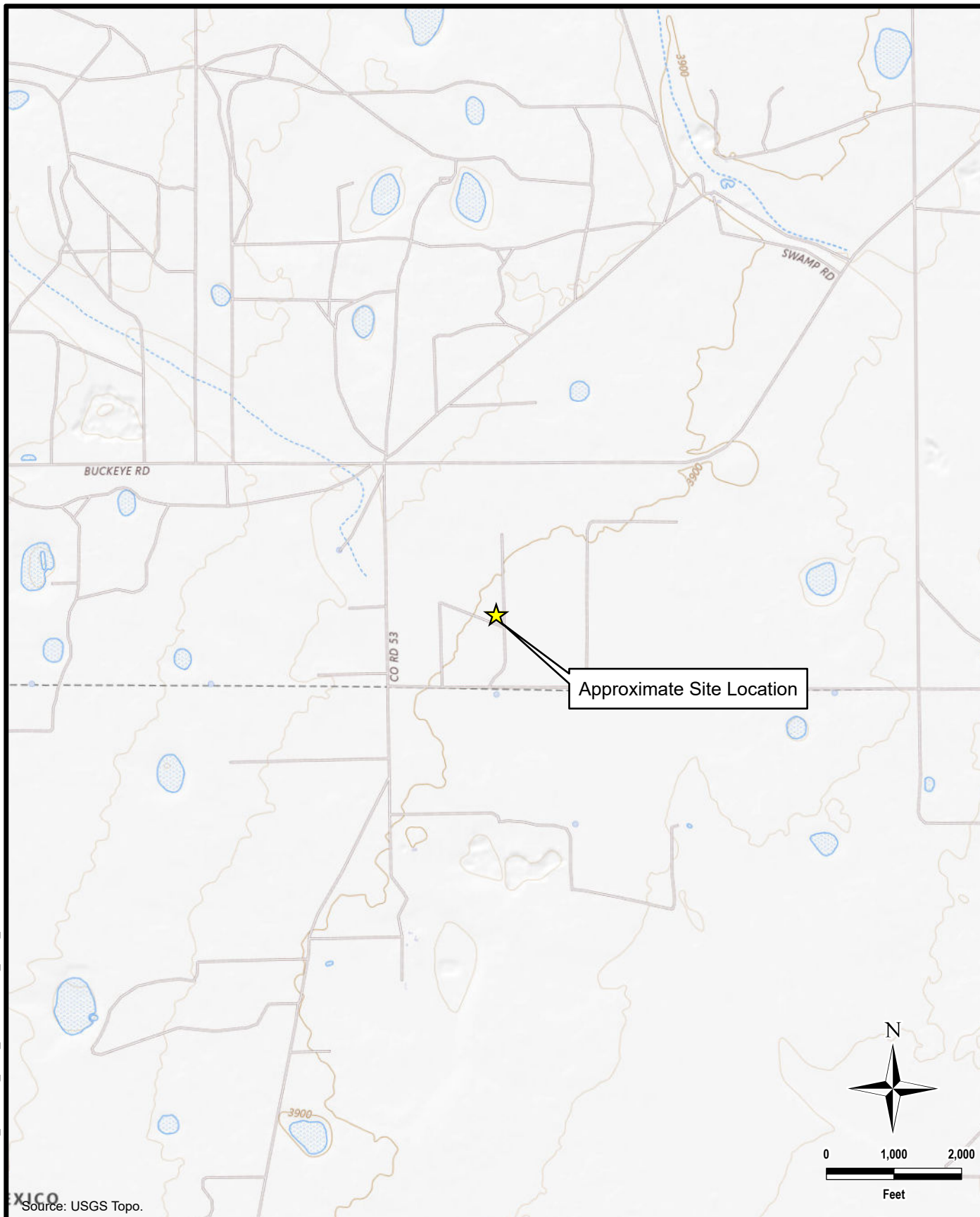
DATE: OCTOBER 03, 2024

DESIGNED BY: LMV


Figure No.

1

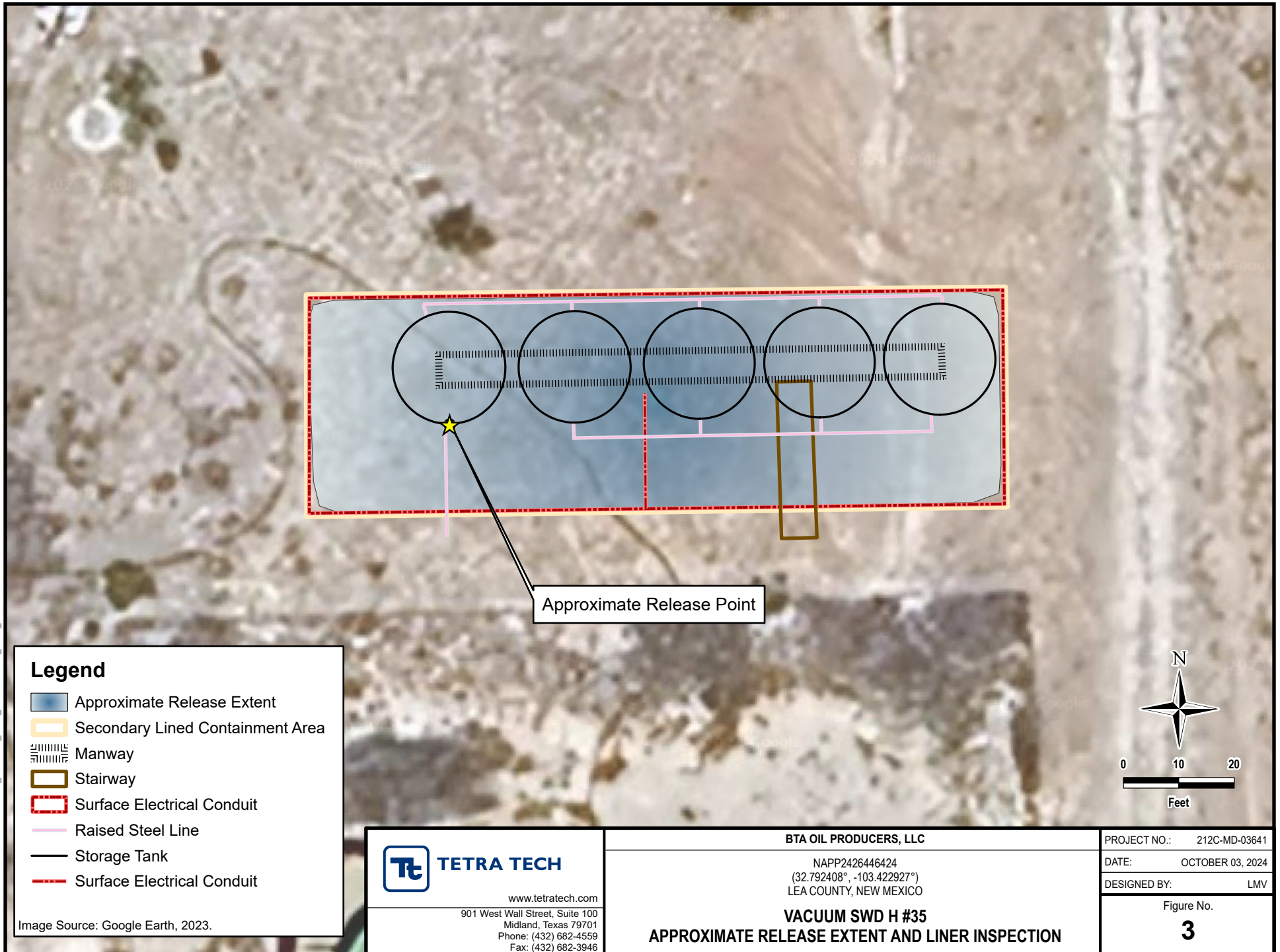
DOCUMENT PATH: Y:\BTA\212C-MD-03641_VACUUM_SWD_H35\VACUUM_SWD_H35.APRX



DOCUMENT PATH: Y:\BTA\212C-MD-03641_VACUUM_SW_D_H35\VACUUM_SW_D_H35.APRX

 TETRA TECH www.tetrattech.com 901 West Wall Street, Suite 100 Midland, Texas 79701 Phone: (432) 682-4559 Fax: (432) 682-3946	BTA OIL PRODUCERS, LLC NAPP2426446424 (32.792408°, -103.422927°) LEA COUNTY, NEW MEXICO VACUUM SWD H #35 TOPOGRAPHIC MAP	PROJECT NO.: 212C-MD-03641 DATE: OCTOBER 03, 2024 DESIGNED BY: LMV Figure No. 2
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DOCUMENT PATH: Y:\BTA\212C-MD-03641_VACUUM_SWD_H35\VACUUM_SWD_H35\APRX



APPENDIX A C-141 Forms

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

Action 385428

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 385428
	Action Type: [NOTIFY] Notification Of Release (NOR)

QUESTIONS

Location of Release Source	
Please answer all the questions in this group.	
Site Name	Vacuum SWD H #35
Date Release Discovered	09/18/2024
Surface Owner	State

Incident Details	
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

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	Not answered.
Produced Water Released (bbls) Details	Cause: Equipment Failure Tank (Any) Produced Water Released: 27 BBL Recovered: 27 BBL Lost: 0 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)	On September 18, 2024 at approximately 8:10 MDT, a 4" suction hose was ripped off a produced water tank resulting in the release of approximately 26.7 bbls of produced water. the release was full contained within the secondary lined containment area. 26.7 bbls of produced water were recovered during initial response. the lined containment area will be pressure washed and cleaned. a C-141L and liner inspection will be completed.

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QUESTIONS, Page 2

Action 385428

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 385428
	Action Type: [NOTIFY] Notification Of Release (NOR)

QUESTIONS

Nature and Volume of Release (continued)	
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 19.15.29.11(A)(5)(a) NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.	

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ACKNOWLEDGMENTS

Action 385428

ACKNOWLEDGMENTS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 385428
	Action Type: [NOTIFY] Notification Of Release (NOR)

ACKNOWLEDGMENTS

<input checked="" type="checkbox"/>	I acknowledge that I am authorized to submit notification of a release on behalf of my operator.
<input checked="" type="checkbox"/>	I acknowledge that upon submitting this application, I will be creating a new incident file (assigned to my operator) to track the notification(s) and corrective action(s) for a release, pursuant to NMAC 19.15.29.
<input checked="" type="checkbox"/>	I acknowledge that creating a new incident file will require my operator to file subsequent submission(s) of form "C-141, Application for administrative approval of a release notification and corrective action", pursuant to NMAC 19.15.29.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	I acknowledge the fact that 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.
<input checked="" type="checkbox"/>	I acknowledge the fact that, 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.

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CONDITIONS

Action 385428

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 385428
	Action Type: [NOTIFY] Notification Of Release (NOR)

CONDITIONS

Created By	Condition	Condition Date
nicholas poole	When submitting future reports regarding this release, please submit the calculations used or specific justification for the volumes reported on the initial C-141.	9/20/2024

***** LIQUID SPILLS - VOLUME CALCULATIONS *****

Release Location Name: Vacuum SWD H #35 Date of Release: 9/18/2024

If the leak/spill is associated with production equipment, i.e. - wellhead, stuffing box, flowline, tank battery, production vessel, transfer pump, or storage tank place an "X" here: ☒

Input Data:

If spill volumes from measurement, i.e. metering, tank volumes, etc. are known enter the volumes here:

OIL:

0.0000 BBL

WATER:

26.7000 BBL

If "known" spill volumes are given, input data for the following "Area Calculations" is optional. The above will override the calculated volumes.

Total Area Calculations						Standing Liquid Calculations							
Total Surface Area	width	length	wet soil depth	oil (%)	Standing Liquid Area	width	length	liquid depth	oil (%)				
Rectangle Area #1	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #1	20.00 ft	X	30.00 ft	X	3.00 in	0.00%
Rectangle Area #2	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #2	0.00 ft	X	0.00 ft	X	0.00 in	0.00%
Rectangle Area #3	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #3	0.00 ft	X	0.00 ft	X	0.00 in	0.00%
Rectangle Area #4	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #4	0.00 ft	X	0.00 ft	X	0.00 in	0.00%
Rectangle Area #5	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #5	0.00 ft	X	0.00 ft	X	0.00 in	0.00%
Rectangle Area #6	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #6	0.00 ft	X	0.00 ft	X	0.00 in	0.00%
Rectangle Area #7	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #7	0.00 ft	X	0.00 ft	X	0.00 in	0.00%
Rectangle Area #8	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #8	0.00 ft	X	0.00 ft	X	0.00 in	0.00%

ERROR - Standing Liquid Area larger than Total Area, Review Data Input

production system leak - DAILY PRODUCTION DATA REQUIRED

Average Daily Production:

Oil

_____ BBL

Water

_____ BBL

Did leak occur before the separator?: ☐ YES ☒ N/A (place an "X")

Amount of Free Liquid Recovered:

27 BBL

okay

Percentage of Oil in Free Liquid Recovered:

0.00%

(percentage)

Liquid holding factor *:

0.14 gal per gal

Use the following when the spill wets the grains of the soil.

* sand = .08 gallon liquid per gallon volume of soil.

* gravelly (caliche) loam = .14 gallon liquid per gallon volume of soil.

* sandy clay loam soil = .14 gallon liquid per gallon volume of soil.

* clay loam = .16 gallon liquid per gallon volume of soil.

Use the following when the liquid completely fills the pore space of the soil:

Occurs when the spill soaked soil is contained by barriers, natural (or not).

* gravelly (caliche) loam = .25 gallon liquid per gallon volume of soil.

* sandy loam = .5 gallon liquid per gallon volume of soil.

Saturated Soil Volume Calculations:				Free Liquid Volume Calculations:			
Total Solid/Liquid Volume:	sq. ft.	H2O cu. ft.	OIL cu. ft.	Total Free Liquid Volume:	600 sq. ft.	H2O 150 cu. ft.	OIL cu. ft.
<u>Estimated Volumes Spilled</u>				<u>Estimated Production Volumes Lost</u>			
Liquid in Soil:		0.0 BBL	0.0 BBL	Estimated Production Spilled:		26.7 BBL	0.0 BBL
Free Liquid:		26.7 BBL	0.0 BBL	<u>Estimated Surface Damage</u>			
Totals:		26.7 BBL	0.0 BBL	Surface Area:	600 sq. ft.		
				Surface Area:	.0138 acre		
<u>Recovered Volumes</u>				<u>Estimated Weights, and Volumes</u>			
Estimated oil recovered:	0.0 BBL	check - okay		Saturated Soil =	lbs	cu. ft.	cu. yds.
Estimated water recovered:	26.7 BBL	check - okay		Total Liquid =	27 BBL	1,121 gallon	9,330 lbs

Released to Imaging: 10/31/2024 1:41:13 PM

Spill Calculator - Vacuum SWD H 35.xlsx

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QUESTIONS

Action 385432

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 385432
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2426446424
Incident Name	NAPP2426446424 VACUUM SWD H #35 @ 0
Incident Type	Produced Water Release
Incident Status	Initial C-141 Received

Location of Release Source	
Please answer all the questions in this group.	
Site Name	Vacuum SWD H #35
Date Release Discovered	09/18/2024
Surface Owner	State

Incident Details	
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

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	Not answered.
Produced Water Released (bbls) Details	Cause: Equipment Failure Tank (Any) Produced Water Released: 27 BBL Recovered: 27 BBL Lost: 0 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)	On September 18, 2024 at approximately 8:10 MDT, a 4" suction hose was ripped off a produced water tank resulting in the release of approximately 26.7 bbls of produced water. the release was full contained within the secondary lined containment area. 26.7 bbls of produced water were recovered during initial response. the lined containment area will be pressure washed and cleaned. a C-141L and liner inspection will be completed.

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QUESTIONS, Page 2

Action 385432

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 385432
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Nature and Volume of Release (continued)	
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: Nicholas Poole Title: with Tetrattech Email: nicholas.poole@tetrattech.com Date: 09/20/2024
--	--

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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 3

Action 385432

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 385432
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Site Characterization	
<i>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.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 26 and 50 (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	Greater than 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 5 (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	Greater than 5 (mi.)
Any other fresh water well or spring	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 300 and 500 (ft.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 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	
<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>	
Requesting a remediation plan approval with this submission	No
<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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Santa Fe, NM 87505

CONDITIONS

Action 385432

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 385432
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

CONDITIONS

Created By	Condition	Condition Date
nvelez	None	9/23/2024

Incident ID	
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?	_____ (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input 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 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 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 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 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 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 type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input 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	
District RP	
Facility ID	
Application ID	

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

Printed Name: _____ Title: _____

Signature:  _____ Date: __10/8/24__

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

Incident ID	
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: _____ Title: _____

Signature:  _____ Date: _____

email: _____ Telephone: _____

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.

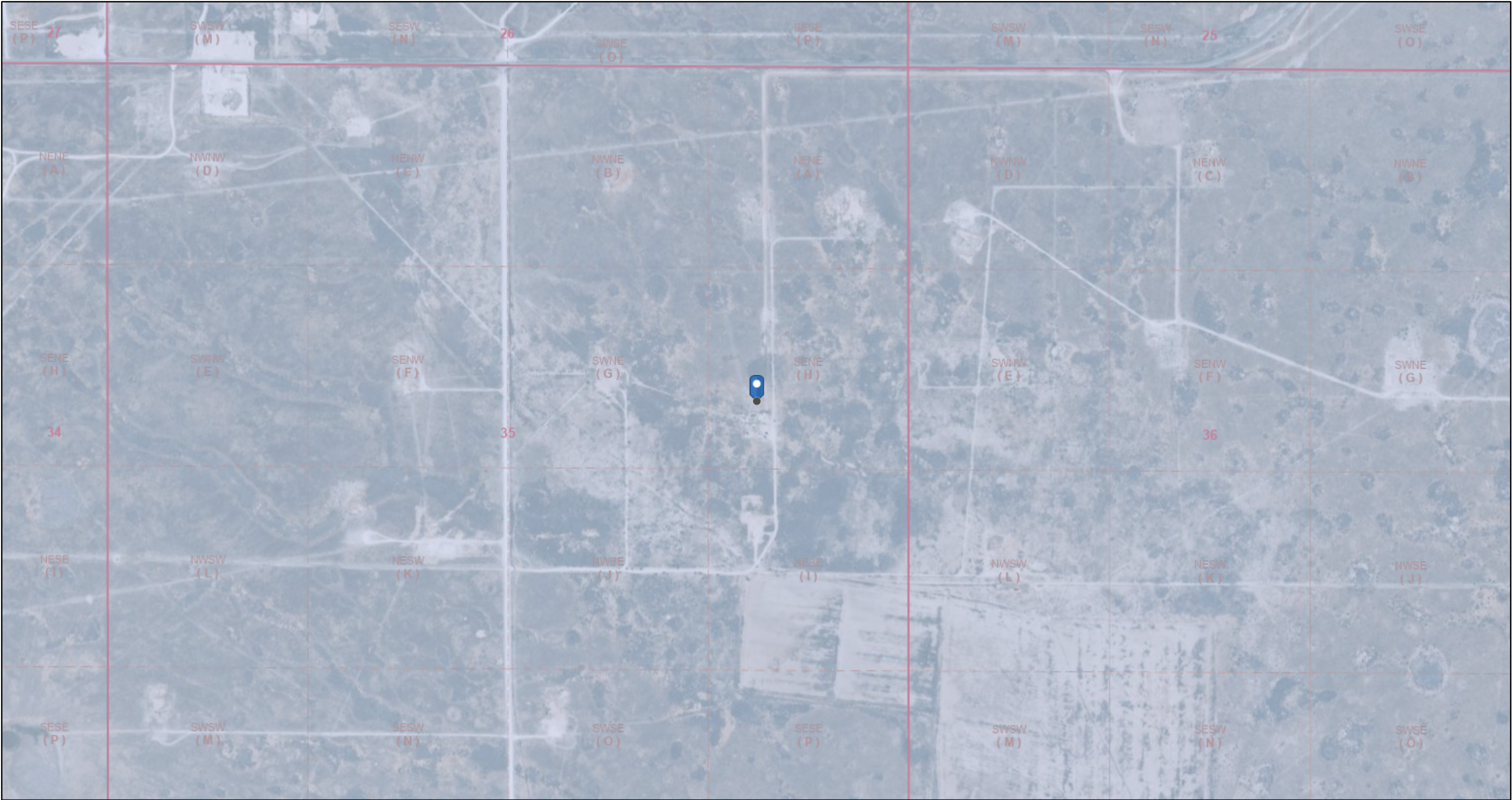
Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____

APPENDIX B




Site Characterization Data

NM OCD - Permian Basin Karst Areas

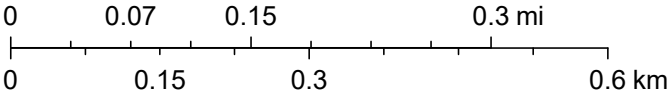


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Karst Occurrence Potential

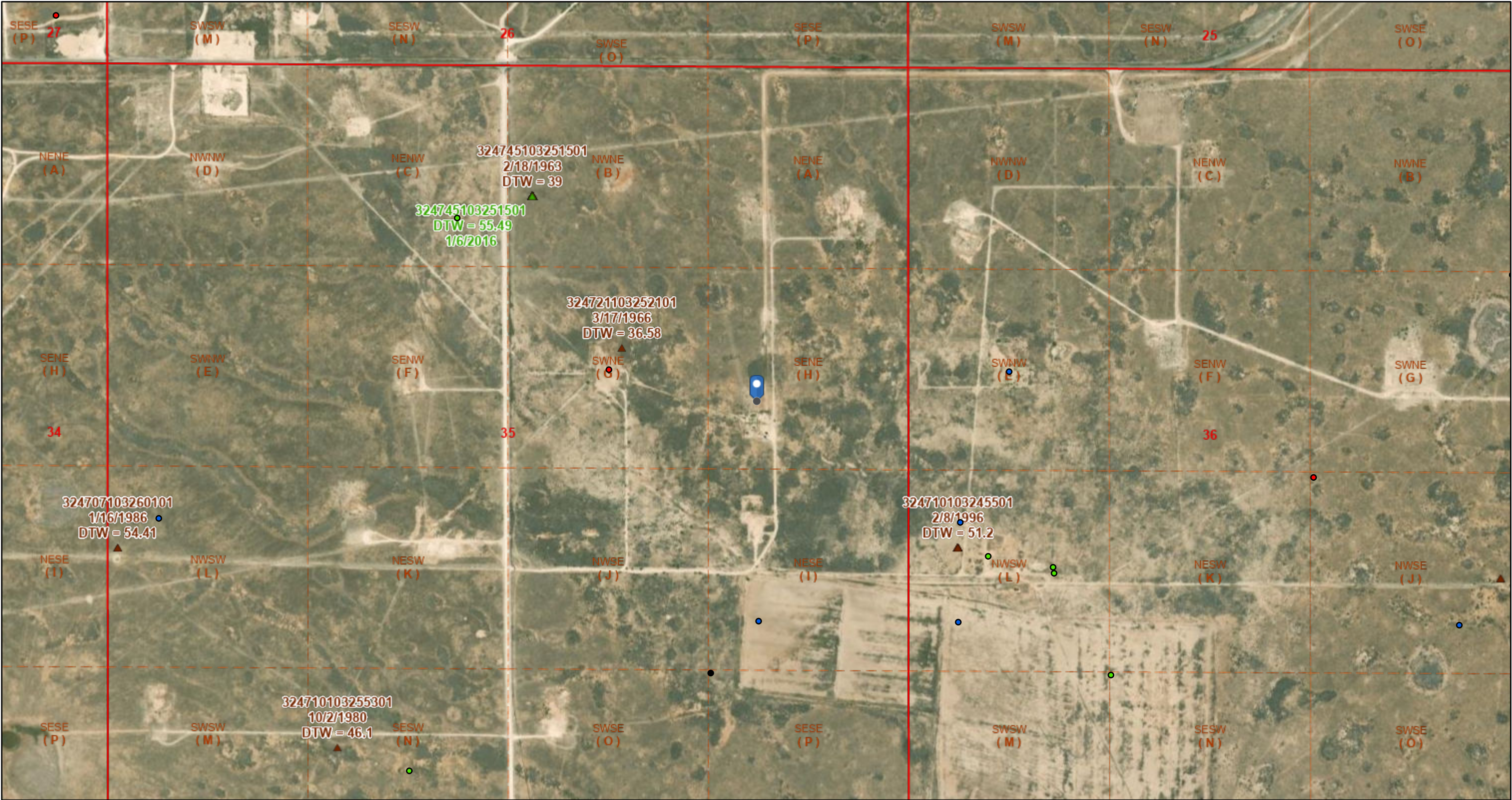
-  Low
-  PLSS Second Division
-  PLSS First Division

1:9,028



BLM, OCD, New Mexico Tech, Esri, HERE, Garmin, iPC, Maxar, BLM

OSE Water Pods & USGS Groundwater Wells



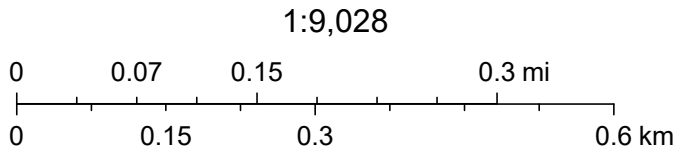
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OSE Water PODs

- Inactive
- Active
- Pending

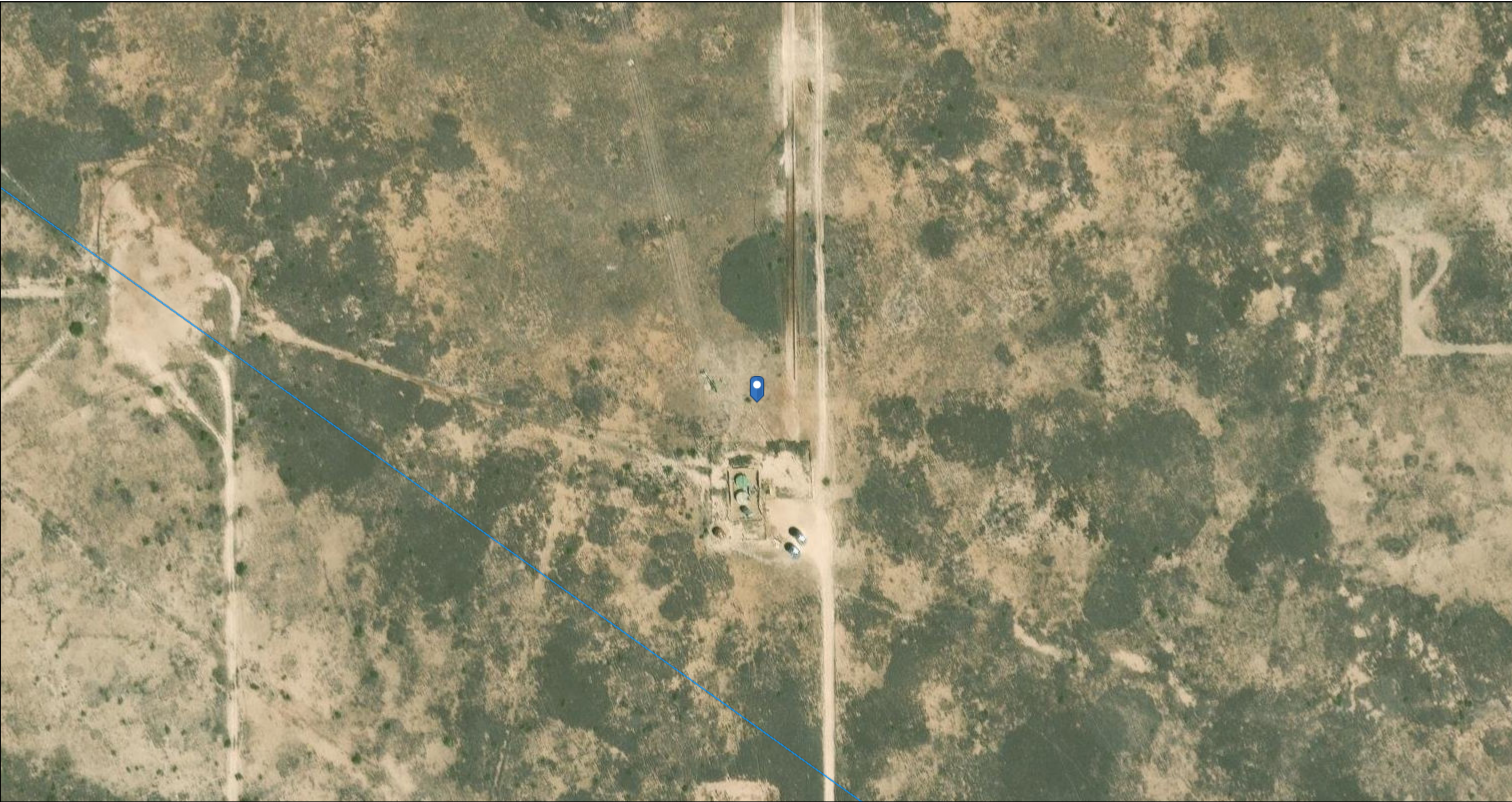
- Plugged
- ▲ USGS Historical GW Wells

- ▲ USGS Active Monitoring GW Wells
- PLSS Second Division
- PLSS First Division



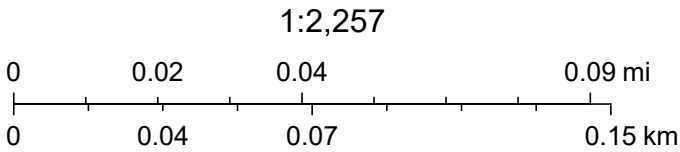
USGS, Esri, HERE, Garmin, iPC, Maxar, BLM

NM OCD - Hydrology



9/20/2024, 1:37:47 PM

— OSE Streams



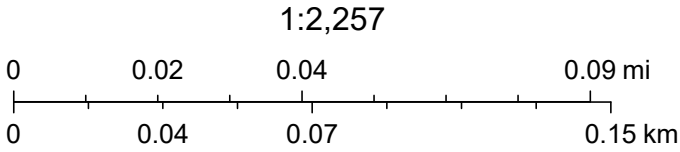
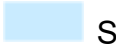
Maxar, Microsoft, Esri, HERE, Garmin, IPC, NM OSE

NM OCD - Surface Ownership



9/20/2024, 1:38:37 PM

Land Ownership



U.S. BLM, Maxar, Microsoft, Esri, HERE, Garmin, iPC

National Flood Hazard Layer FIRMMette



103°25'41"W 32°47'48"N



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped



The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

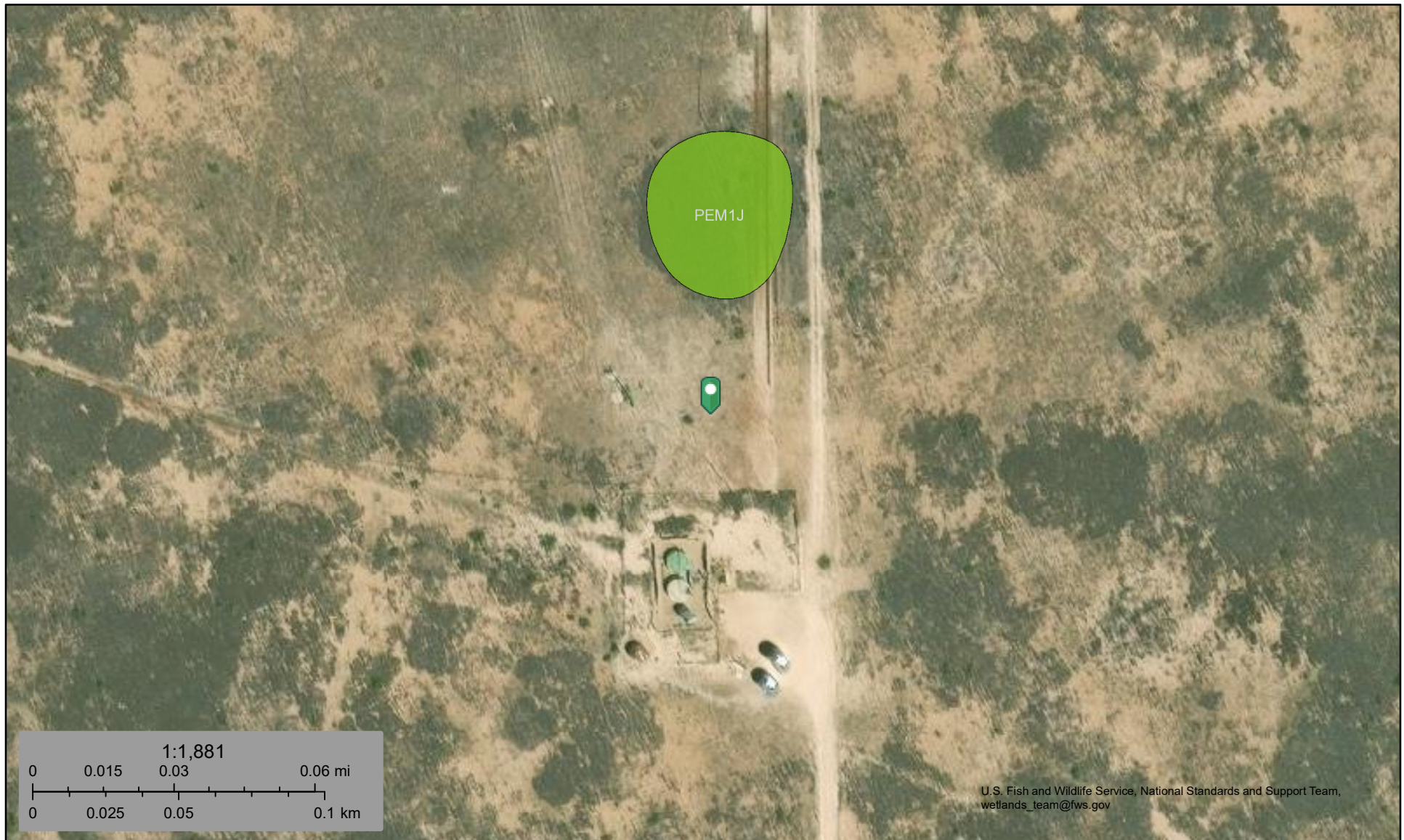
This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 9/20/2024 at 2:39 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.



National Wetlands Inventory



September 20, 2024

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond

- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

***** LIQUID SPILLS - VOLUME CALCULATIONS *****

Release Location Name: Vacuum SWD H #35

Date of Release: 9/18/2024

If the leak/spill is associated with production equipment, i.e. - wellhead, stuffing box,
flowline, tank battery, production vessel, transfer pump, or storage tank place an "X" here: ☒

Input Data:

If spill volumes from measurement, i.e. metering, tank volumes, etc. are known enter the volumes here: OIL: 0.0000 BBL WATER: 26.7000 BBL

If "known" spill volumes are given, input data for the following "Area Calculations" is optional. The above will override the calculated volumes.

Total Area Calculations						Standing Liquid Calculations								
Total Surface Area		width	length	wet soil depth	oil (%)	Standing Liquid Area		width	length	liquid depth	oil (%)			
	Rectangle Area #1	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #1	20.00 ft	X	30.00 ft	X	3.00 in	0.00%
	Rectangle Area #2	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #2	0.00 ft	X	0.00 ft	X	0.00 in	0.00%
	Rectangle Area #3	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #3	0.00 ft	X	0.00 ft	X	0.00 in	0.00%
	Rectangle Area #4	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #4	0.00 ft	X	0.00 ft	X	0.00 in	0.00%
	Rectangle Area #5	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #5	0.00 ft	X	0.00 ft	X	0.00 in	0.00%
	Rectangle Area #6	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #6	0.00 ft	X	0.00 ft	X	0.00 in	0.00%
	Rectangle Area #7	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #7	0.00 ft	X	0.00 ft	X	0.00 in	0.00%
	Rectangle Area #8	0.00 ft	X	0.00 ft	X	0.00 in	0.00%	Rectangle Area #8	0.00 ft	X	0.00 ft	X	0.00 in	0.00%

ERROR - Standing Liquid Area larger than Total Area, Review Data Input
production system leak - DAILY PRODUCTION DATA REQUIRED

Average Daily Production: Oil _____ BBL Water _____ BBL

Did leak occur before the separator?: ☐ YES ☒ N/A (place an "X")

Amount of Free Liquid Recovered: 27 BBL okay

Percentage of Oil in Free Liquid Recovered: 0.00% (percentage)

Liquid holding factor *: 0.14 gal per gal

Use the following when the spill wets the grains of the soil.

* sand = .08 gallon liquid per gallon volume of soil.

* gravelly (caliche) loam = .14 gallon liquid per gallon volume of soil.

* sandy clay loam soil = .14 gallon liquid per gallon volume of soil.

* clay loam = .16 gallon liquid per gallon volume of soil.

Use the following when the liquid completely fills the pore space of the soil:

Occurs when the spill soaked soil is contained by barriers, natural (or not).

* gravelly (caliche) loam = .25 gallon liquid per gallon volume of soil.

* sandy loam = .5 gallon liquid per gallon volume of soil.

Saturated Soil Volume Calculations:

Total Solid/Liquid Volume: sq. ft. H2O cu. ft. OIL cu. ft.

Estimated Volumes Spilled

Liquid in Soil: 0.0 BBL 0.0 BBL
Free Liquid: 26.7 BBL 0.0 BBL
Totals: 26.7 BBL 0.0 BBL

Total Spill Liquid: 26.7 BBL 0.0 BBL

Recovered Volumes

Estimated oil recovered: 0.0 BBL check - okay
Estimated water recovered: 26.7 BBL check - okay

Free Liquid Volume Calculations:

Total Free Liquid Volume: 600 sq. ft. H2O 150 cu. ft. OIL cu. ft.

Estimated Production Volumes Lost

Estimated Production Spilled: H2O 26.7 BBL OIL 0.0 BBL

Estimated Surface Damage

Surface Area: 600 sq. ft.
Surface Area: .0138 acre

Estimated Weights, and Volumes

Saturated Soil = lbs cu. ft. cu. yds.
Total Liquid = 27 BBL 1,121 gallon 9,330 lbs

APPENDIX C

Regulatory Correspondence

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

QUESTIONS

Action 386170

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 386170
	Action Type: [NOTIFY] Notification Of Liner Inspection (C-141L)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2426446424
Incident Name	NAPP2426446424 VACUUM SWD H #35 @ 0
Incident Type	Produced Water Release
Incident Status	Initial C-141 Approved

Location of Release Source	
Site Name	Vacuum SWD H #35
Date Release Discovered	09/18/2024
Surface Owner	State

Liner Inspection Event Information	
Please answer all the questions in this group.	
What is the liner inspection surface area in square feet	600
Have all the impacted materials been removed from the liner	Yes
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	09/27/2024
Time liner inspection will commence	08:00 AM
Please provide any information necessary for observers to liner inspection	On September 18, 2024 at approximately 8:10 MDT, a 4" suction hose was ripped off a produced water tank resulting in the release of approximately 26.7 bbls of produced water. the release was fully contained within the secondary lined containment area. 26.7 bbls of produced water were recovered during initial response. The facility is not shown in current aerial imagery. the gps coordinate of the facility is 32.792386, -103.422741
Please provide any information necessary for navigation to liner inspection site	The facility is not shown on current aerial imagery. the facility is located at GPS 32.792386, -103.422741

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State of New Mexico
Energy, Minerals and Natural Resources
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CONDITIONS

Action 386170

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 386170
	Action Type: [NOTIFY] Notification Of Liner Inspection (C-141L)

CONDITIONS

Created By	Condition	Condition Date
nicholas poole	Failure to notify the OCD of liner inspections including any changes in date/time per the requirements of 19.15.29.11.A(5)(a)(ii) NMAC, may result in the inspection not being accepted.	9/24/2024

APPENDIX D

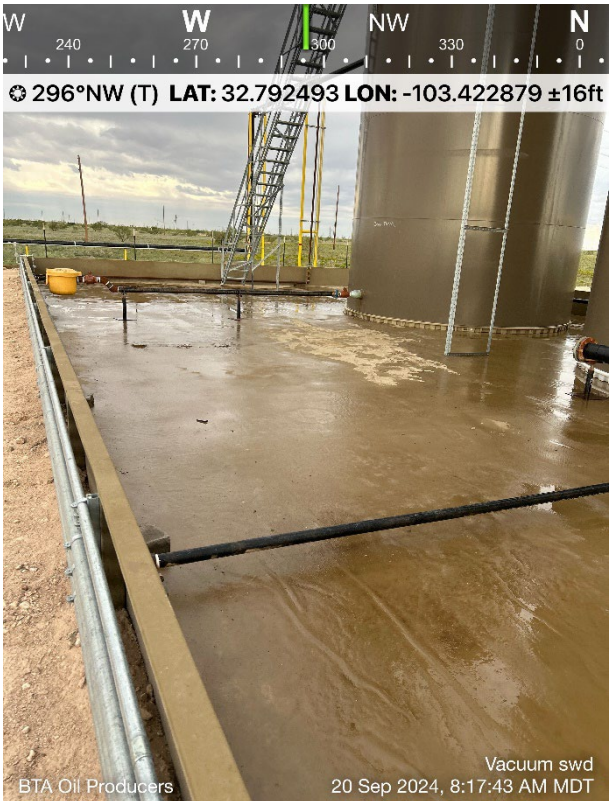
Photographic Documentation



TETRA TECH, INC. PROJECT NO. 212C-MD-03641	DESCRIPTION	View northeast of approximate release extent in secondary containment berm.	1
	SITE NAME	Vacuum SWD H #35 Release	9/20/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03641	DESCRIPTION	View east-northeast of approximate release extent in secondary containment berm.	2
	SITE NAME	Vacuum SWD H #35 Release	9/20/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03641	DESCRIPTION	View west-northwest of approximate release extent in secondary containment berm.	3
	SITE NAME	Vacuum SWD H #35 Release	9/20/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03641	DESCRIPTION	View of approximate release extent in secondary containment berm.	4
	SITE NAME	Vacuum SWD H #35 Release	N/A



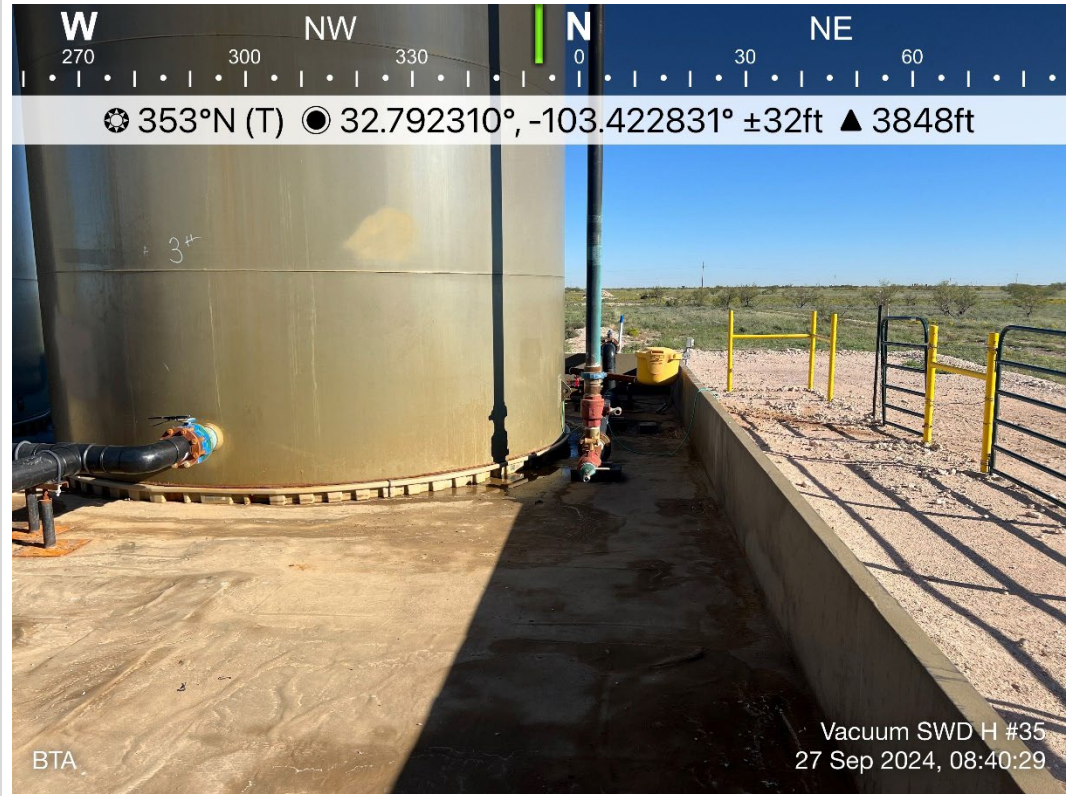
TETRA TECH, INC. PROJECT NO. 212C-MD-03641	DESCRIPTION	View north-northwest of site signage. Vacuum SWD System.	5
	SITE NAME	Vacuum SWD H #35 Release	9/27/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03641	DESCRIPTION	View east. Current lined containment area conditions: no rips, holes, or tears observed.	6
	SITE NAME	Vacuum SWD H #35 Release	9/27/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03641	DESCRIPTION	View east. Current lined containment area conditions: no rips, holes, or tears observed.	7
	SITE NAME	Vacuum SWD H #35 Release	9/27/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03641	DESCRIPTION	View north. Current lined containment area conditions: no rips, holes, or tears observed.	8
	SITE NAME	Vacuum SWD H #35 Release	9/27/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03641	DESCRIPTION	View west-southwest. Current lined containment area conditions: no rips, holes, or tears observed.	9
	SITE NAME	Vacuum SWD H #35 Release	9/27/2024

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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
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Santa Fe, NM 87505

QUESTIONS

Action 393468

QUESTIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:
	260297
	Action Number:
	393468
Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2426446424
Incident Name	NAPP2426446424 VACUUM SWD H #35 @ 0
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received

Location of Release Source

Please answer all the questions in this group.

Site Name	Vacuum SWD H #35
Date Release Discovered	09/18/2024
Surface Owner	State

Incident Details

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

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	Not answered.
Produced Water Released (bbls) Details	Cause: Equipment Failure Tank (Any) Produced Water Released: 27 BBL Recovered: 27 BBL Lost: 0 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)	On September 18, 2024 at approximately 8:10 MDT, a 4" suction hose was ripped off a produced water tank resulting in the release of approximately 26.7 bbls of produced water. the release was full contained within the secondary lined containment area. 26.7 bbls of produced water were recovered during initial response. the lined containment area will be pressure washed and cleaned. a C-141L and liner inspection will be completed.

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QUESTIONS, Page 2

Action 393468

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 393468
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Nature and Volume of Release (continued)	
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: Nicholas Poole Title: with Tetrattech Email: nicholas.poole@tetrattech.com Date: 10/17/2024
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QUESTIONS, Page 3

Action 393468

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 393468
	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 26 and 50 (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	Greater than 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 5 (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	Greater than 5 (mi.)
Any other fresh water well or spring	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 300 and 500 (ft.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 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	Yes
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	09/27/2024
On what date will (or did) the final sampling or liner inspection occur	09/27/2024
On what date will (or was) the remediation complete(d)	09/27/2024
What is the estimated surface area (in square feet) that will be remediated	5000
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 393468

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 393468
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS**Remediation Plan (continued)**

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.

This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:

(Select all answers below that apply.)

Is (or was) there affected material present needing to be removed	No
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	No

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 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: Nicholas Poole Title: with Tetrattech Email: nicholas.poole@tetrattech.com Date: 10/17/2024
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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 6

Action 393468

QUESTIONS (continued)

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID:
	260297
	Action Number:
	393468
Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	386170
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	09/27/2024
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	600

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	Yes
What was the total surface area (in square feet) remediated	5000
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	On September 27, 2024, Tetra Tech personnel performed an inspection of the liner within the containment area of the Vacuum SWD H #35 Battery. This work was completed to verify the integrity of the liner. The liner was observed to underlie the entirety of the tank battery containment area. The liner was intact with no visible rips or tears and encompassed by an approximately 2-foot-tall muscle wall.

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: Nicholas Poole Title: with Tetrattech Email: nicholas.poole@tetrattech.com Date: 10/17/2024
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CONDITIONS

Action 393468

CONDITIONS

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Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

CONDITIONS

Created By	Condition	Condition Date
nvelez	Liner inspection approved, release resolved.	10/31/2024