



November 13, 2025

District Supervisor
Oil Conservation Division, District 1
1625 N. French Drive
Hobbs, New Mexico 88240

**Re: Liner Inspection Report
3R Operating, LLC
EagleClaw 5-8 Federal 1H-2H Production Facility Release
Unit Letter D, Section 5, Township 20 South, Range 35 East
Lea County, New Mexico
Incident ID# nAPP2526942638**

Sir or Madam:

3R Operating LLC (3R Operating) contracted Tetra Tech, Inc. (Tetra Tech) to evaluate a release that occurred at the EagleClaw 5-8 Federal 1H-2H Production Facility (fAPP2428847412). The release footprint is located within Public Land Survey System (PLSS) Unit Letter D, Section 5, Township 20 South, Range 35 East, in Lea County, New Mexico (Site). The approximate release point occurred at coordinates 32.608962°, -103.487170°, as shown on Figures 1 and 2. This release is located on private land.

BACKGROUND

On September 25, 2025, a release was discovered at the EagleClaw 5-8 Federal 1H-2H Production Facility. The cause of the release is due to a valve equipment failure. Approximately 300 barrels (bbls) of crude oil were released, and all fluids were reported recovered. According to information provided by 3R Operating the release footprint was limited to the lined containment area, as presented in Figure 3. A Notification of Release (NOR) was submitted to the New Mexico Oil Conservation Division (NMOCD) online portal system. Following the approval of the NOR submittal, the release was assigned the Incident ID nAPP2526942638. The NMOCD initial C-141 Initial Report was duly submitted via the NMOCD online portal system.

The NMOCD incident details erroneously identify the incident coordinates as 32.6087783°, -104.4860527° in Eddy County, which is approximately 58 miles west of the actual release Site. The listed Public Land Survey System project location is correct. The error is due to a one digit difference in the longitude. The EagleClaw 5-8 Federal 1H-2H Production Facility shares a pad with the Eagle Claw Federal Com #001H well (API # 30-025-42988).

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)	Between 50 and 100 (ft.)
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.tetrattech.com

Liner Inspection Report
November 13, 2025

3R Operating, 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	Greater than 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or 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 1 and 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
A (non-karst) unstable area	Greater than 5 (mi.)
Categorized 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

According to the New Mexico Office of the State Engineers (NMOSE) reporting system, there are no groundwater wells within ½ mile (800 meters) of the Site. The nearest identified well is located approximately 1 mile southeast of the Site. Well L04158 was drilled in 1959 and had a depth to water of 64 feet below surface. The site characterization data are presented in Appendix A.

REGULATORY FRAMEWORK

Based upon the release footprint and in accordance with Subsection E of 19.15.29.12 NMAC, per 19.15.29.11 NMAC, the site characterization data was used to determine recommended remedial action levels (RRALs) for benzene, toluene, ethylbenzene, and xylene (collectively referred to as BTEX), total petroleum hydrocarbons (TPH), and chlorides in soil.

Based on the lack of available groundwater information within 0.5 miles of the Site, the strictest Table I closure criteria will be applied to this release incident. Thus, based on the site characterization, and in accordance with Table I of 19.15.29.12 NMAC, the RRALs for the Site are as follows:

Constituent	Site RRAL
Chloride	600 mg/kg
TPH (GRO+DRO+ORO)	100 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

Based upon the release footprint (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 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

Liner Inspection Report
November 13, 2025

3R Operating, LLC

- Notification to the appropriate division district office provided 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 EagleClaw 5-8 Federal 1H-2H Production Facility was submitted via the NMOCD portal on October 13, 2025. The liner inspection notification is included in Appendix B.

On October 16, 2025, Tetra Tech personnel were on site to perform an inspection of the liner within the containment area of the EagleClaw 5-8 Federal 1H-2H Production Facility. 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 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 C.

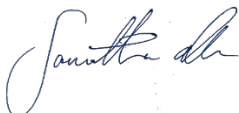
CONCLUSION

Based on the results of the liner inspection, 3R Operating 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-141L) was provided to the appropriate division district office before conducting the liner inspection.

If you have any questions concerning the liner inspection for the Site, please call me at (512) 788-2948.

Sincerely,

Tetra Tech, Inc.



Samantha Allen
Project Manager
Tetra Tech, Inc.



Lisbeth Chavira
Project Manager
Tetra Tech, Inc.

cc: Austin Tramell, 3R Operating, LLC

Liner Inspection Report
November 13, 2025

3R Operating, LLC

LIST OF ATTACHMENTS

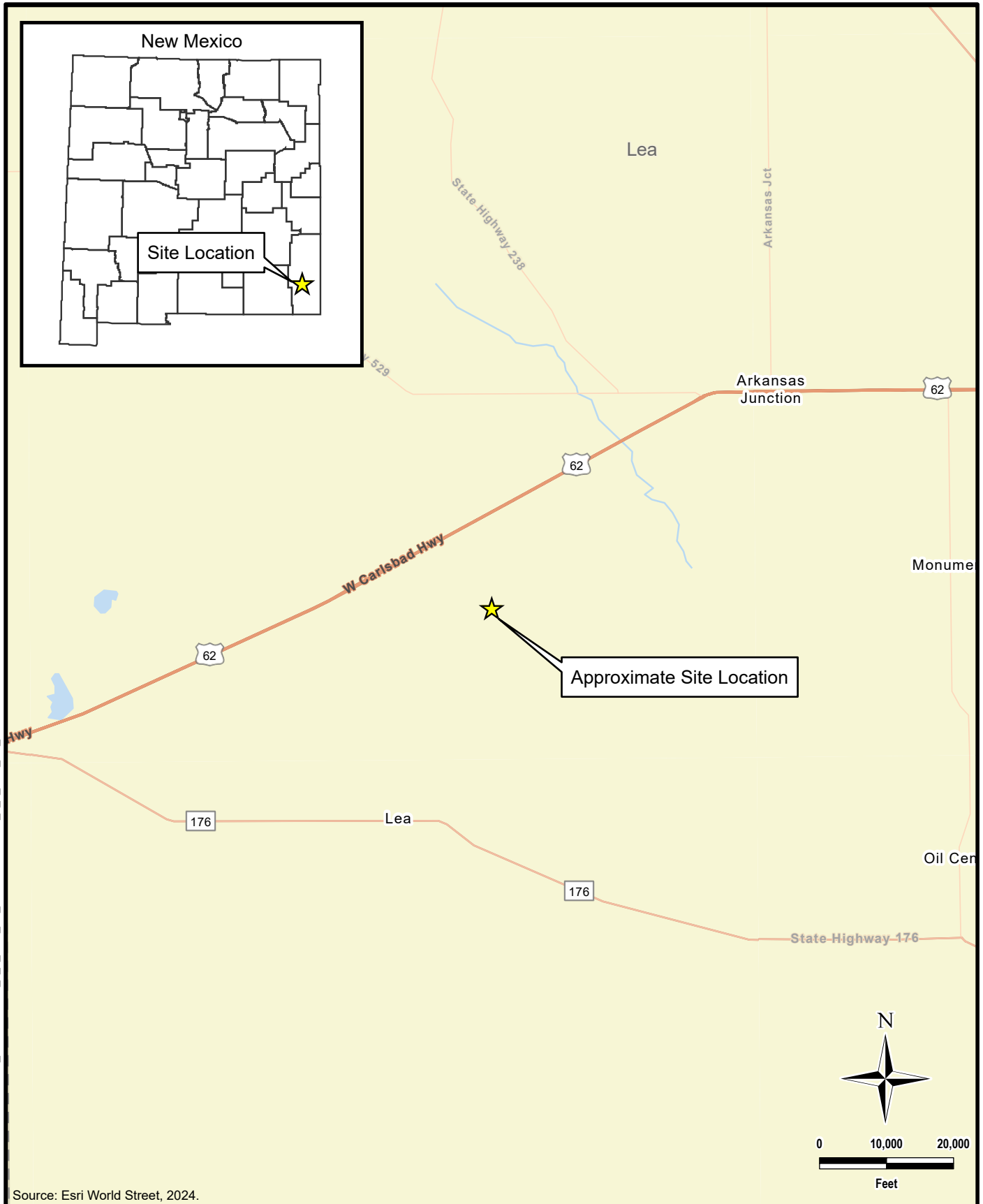
Figures:

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

Appendices:

- Appendix A – Site Characterization Data
- Appendix B – Liner Inspection Notification
- Appendix C – Photographic Documentation

FIGURES



TETRA TECH

www.tetrattech.com

901 West Wall Street, Suite 100
Midland, Texas 79701
Phone: (432) 682-4559
Fax: (432) 682-3946

3R OPERATING, LLC

NAPP2526942638
(32.608962° -103.487170°)
UNIT LETTER D, SECTION 5, TOWNSHIP 20 SOUTH, RANGE 35 EAST
LEA COUNTY, NEW MEXICO

**EAGLECLAW 5-8 FEDERAL 1H-2H PRODUCTION FACILITY RELEASE
OVERVIEW MAP**

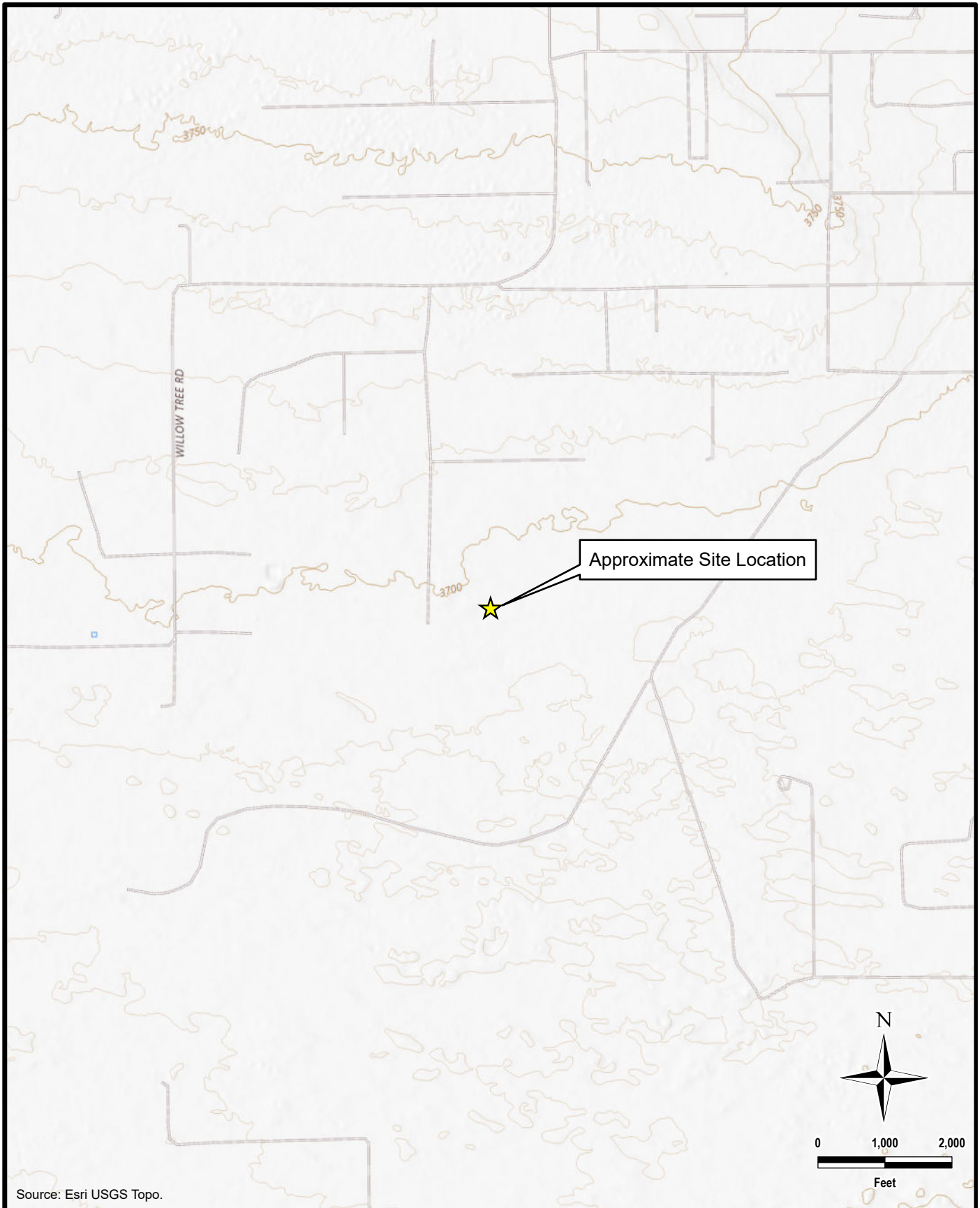
PROJECT NO.: 212C-MD-03593

DATE: NOVEMBER 11, 2025

DESIGNED BY: LMV

Figure No.

1



Source: Esri USGS Topo.



TETRA TECH

www.tetrattech.com

901 West Wall Street, Suite 100
Midland, Texas 79701
Phone: (432) 682-4559
Fax: (432) 682-3946

3R OPERATING, LLC

NAPP2526942638
(32.608962° - 103.487170°)
UNIT LETTER D, SECTION 5, TOWNSHIP 20 SOUTH, RANGE 35 EAST
LEA COUNTY, NEW MEXICO

**EAGLECLAW 5-8 FEDERAL 1H-2H PRODUCTION FACILITY RELEASE
TOPOGRAPHIC MAP**

PROJECT NO.: 212C-MD-03593

DATE: NOVEMBER 11, 2025

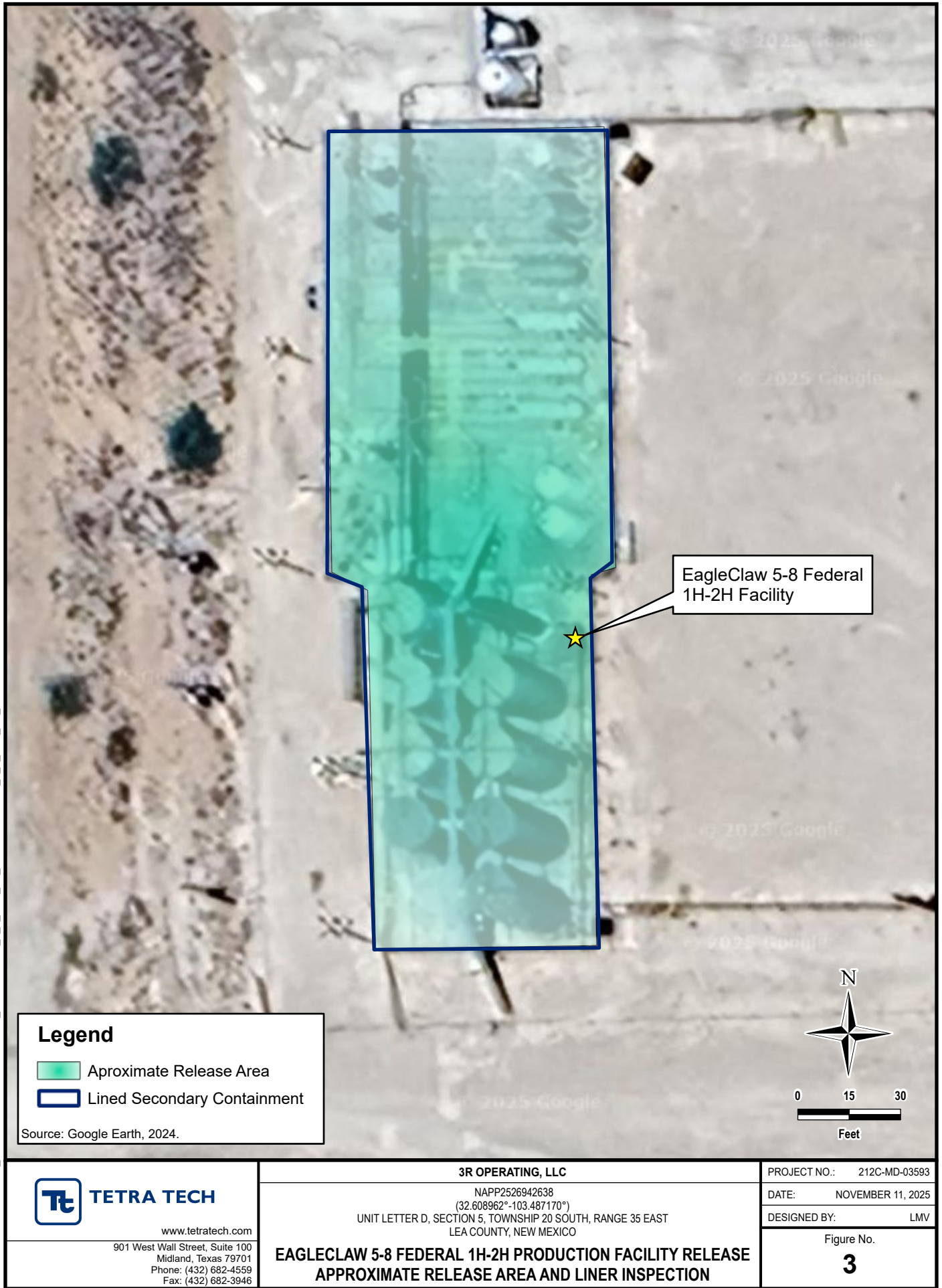
DESIGNED BY: LMV

Figure No.

2

DOCUMENT PATH: Y:\3R_OPERATING\212C-HN-03593_EAGLECLAW_5_8_FED_1H_2H\APRX

DOCUMENT PATH: Y:\3R_OPERATING\212C-HN-03593_EAGLECLAW_5_8_FED_1H_2H\EAGLECLAW_5_8_FED_1H_2H.APRX



APPENDIX A

Site Characterization Data

Surface Ownership



10/30/2025, 5:03:44 PM

Points



Override 2

Wells - Large Scale

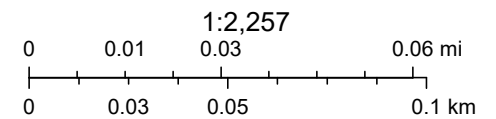
- Oil, Active
- Oil, Cancelled
- Oil, New

Mineral Ownership

- A-All minerals are owned by U.S.
- N-No minerals are owned by the U.S.

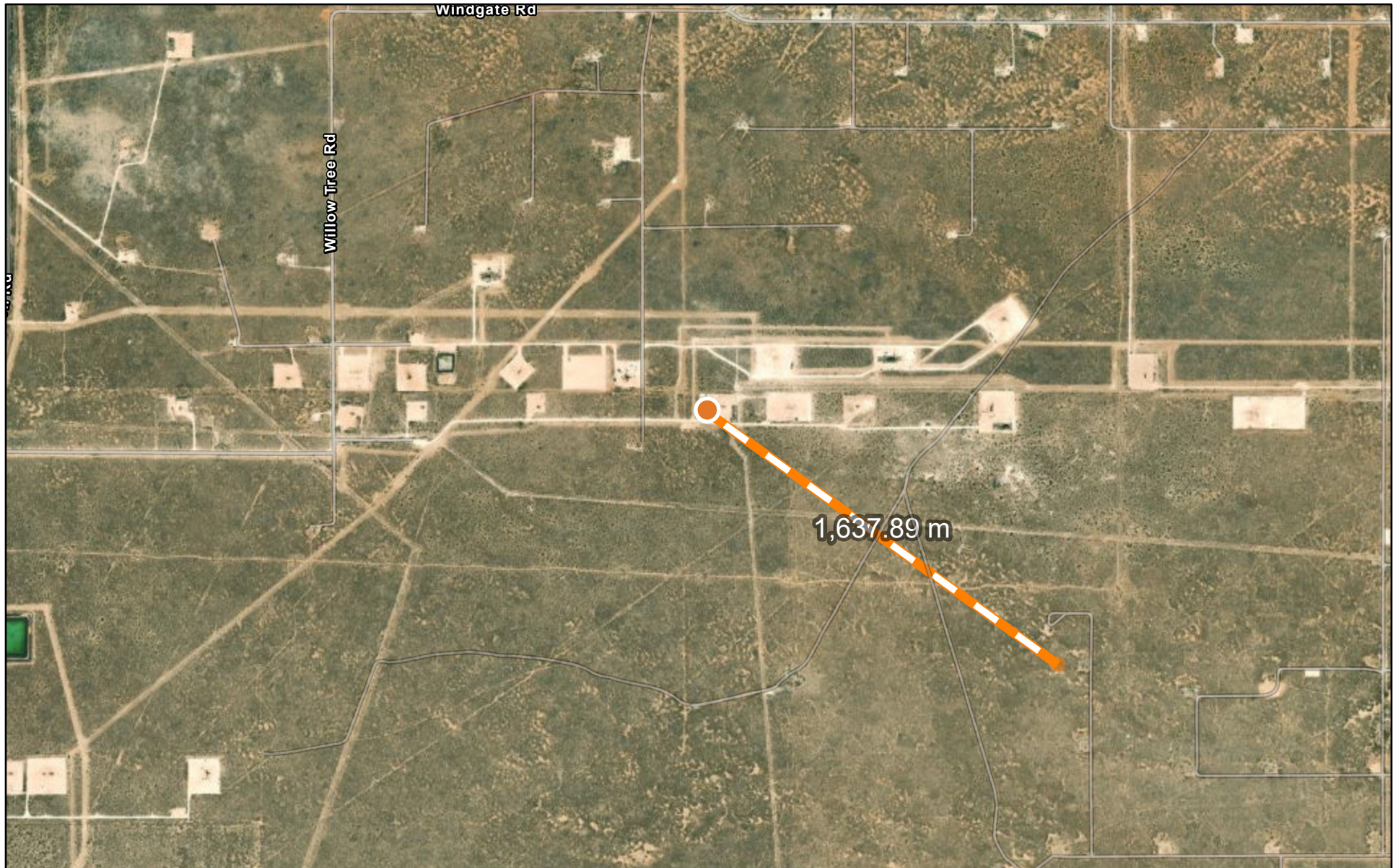
Land Ownership

- BLM
- P
- S



U.S. BLM, Microsoft, Vantor, OCD

OSE POD Locations Map



10/31/2025, 10:23:59 AM

World Imagery

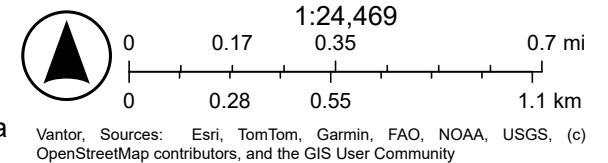
Low Resolution 15m Imagery

High Resolution 60cm Imagery

High Resolution 30cm Imagery

Citations

4.8m Resolution Metadata





New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(A
CLW#####
in the POD
suffix
indicates
the POD has
been
replaced
& no longer
serves a
water right
file.)

(R=POD has
been
replaced,
O=orphaned,
C=the file is
closed)

(quarters are
smallest to
largest)

												(meters)		(In feet)		
POD Number	Code	Sub basin	County	Q64	Q16	Q4	Sec	Tws	Range	X	Y	Map	Distance	Well Depth	Depth Water	Water Column
L 04158		L	LE		NE	SE	05	20S	35E	643290.0	3608008.0 *		1636	70	64	6

Average Depth to Water: **64 feet**

Minimum Depth: **64 feet**

Maximum Depth: **64 feet**

Record Count: 1

Basin/County Search:

County: LE

UTM Filters (in meters):

Easting: 641950.21

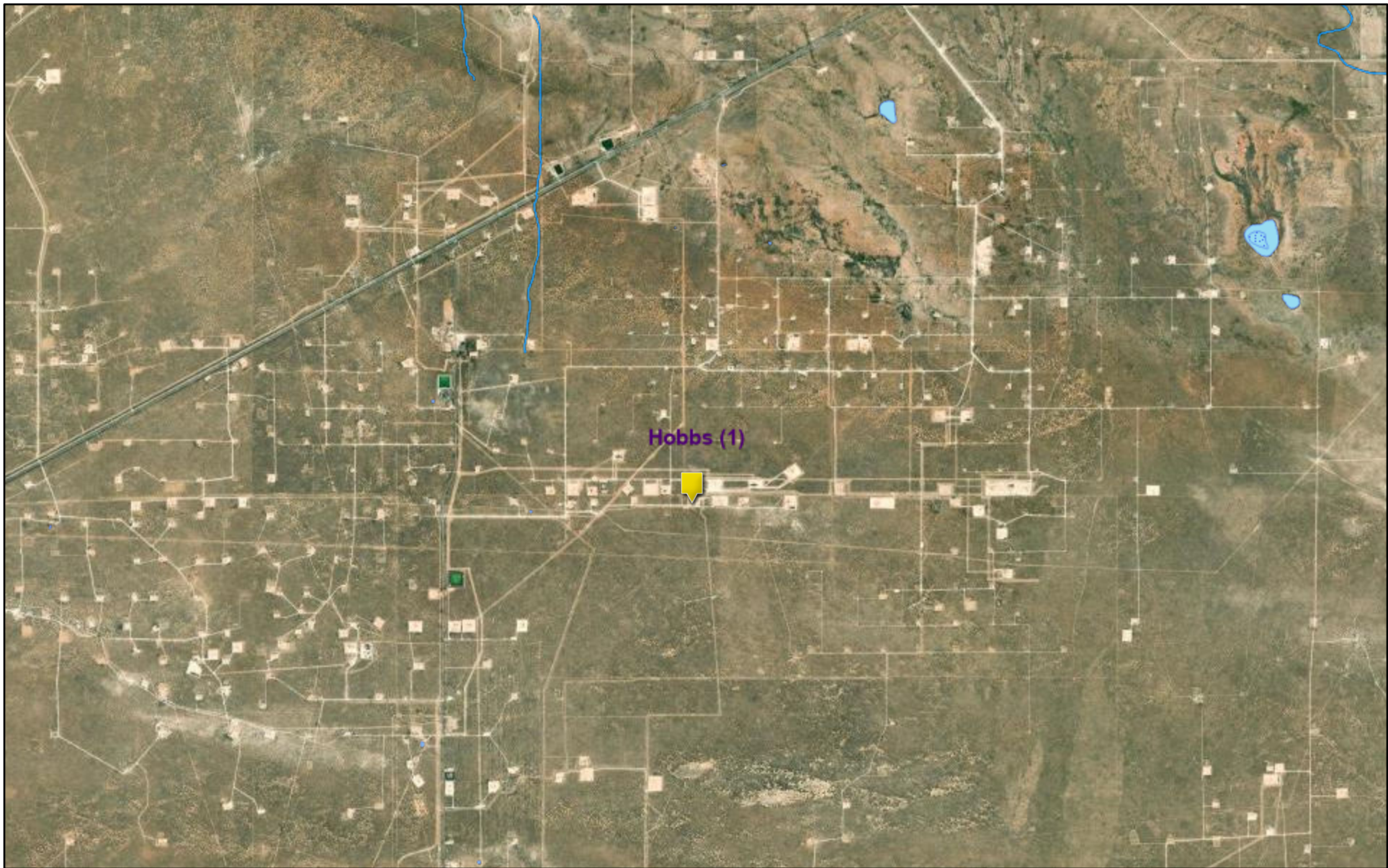
Northing: 3608947.25

Radius: 1650

* UTM location was derived from PLSS - see Help

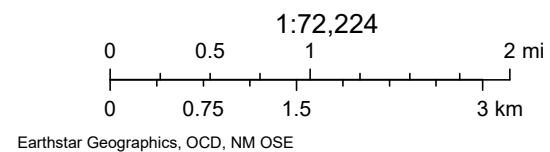
The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

OSE Water Bodies



10/30/2025, 5:11:27 PM

Points
Override 2
OSW Water Bodys
OSE Probable Playas
OSE Streams
OCD Districts



National Flood Hazard Layer FIRMette



103°29'33"W 32°36'47"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		Profile Baseline
		Hydrographic Feature
		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 10/30/2025 at 10:18 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.

Karst Potential



10/30/2025, 5:07:18 PM

Points



Override 2

Wells - Large Scale



Oil, Active



Oil, Cancelled

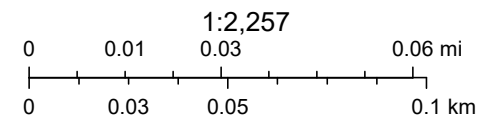


Oil, New

Karst Occurrence Potential



Low



BLM, OCD, New Mexico Tech, Microsoft, Vantor, OCD

New Mexico Oil Conservation Division

APPENDIX B

Liner Inspection Notification

OCD Permitting

Home Operator Data Action Status Action Search Results Action Status Item Details

[NOTIFY] Notification Of Liner Inspection (C-141L) Application

Submission Information

Submission ID:	514568	Districts:	Artesia, Hobbs
Operator:	[331569] 3R Operating, LLC	Counties:	Eddy, Lea
Description:	3R Operating, LLC [331569] , EagleClaw 5-8 Federal 1H-2H Production Facility , nAPP2526942638		
Status:	Approved		
Status Date:	10/13/2025		
References (0):			

Forms

This application type does not have attachments.

Questions

Prerequisites

Incident ID (n#)	nAPP2526942638
Incident Name	NAPP2526942638 EAGLECLAW 5-8 FEDERAL 1H-2H PRODUCTION FACILITY @ FAPP2428847412
Incident Type	Oil Release
Incident Status	Notification Accepted

Date Release Discovered	09/25/2025
Surface Owner	Federal

Liner Inspection Event Information

Please answer all the questions in this group.

What is the liner inspection surface area in square feet

13,987

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

10/16/2025

Time liner inspection will commence

09:00 AM

Warning: Notification can not be less than two business days prior to conducting liner inspection.

Please provide any information necessary for observers to liner inspection

on September 25, 2025, approximately 300 barrels (bbls) of crude oil were released, of which 300 bbls were recovered. The release was fully contained within the walls of the secondary-lined containment. The cause of the release is due to equipment failure.

Please provide any information necessary for navigation to liner inspection site

Facility Location: 32.608962°, -103.487170°.

Acknowledgments

This submission type does not have acknowledgments, at this time.

Comments

No comments found for this submission.

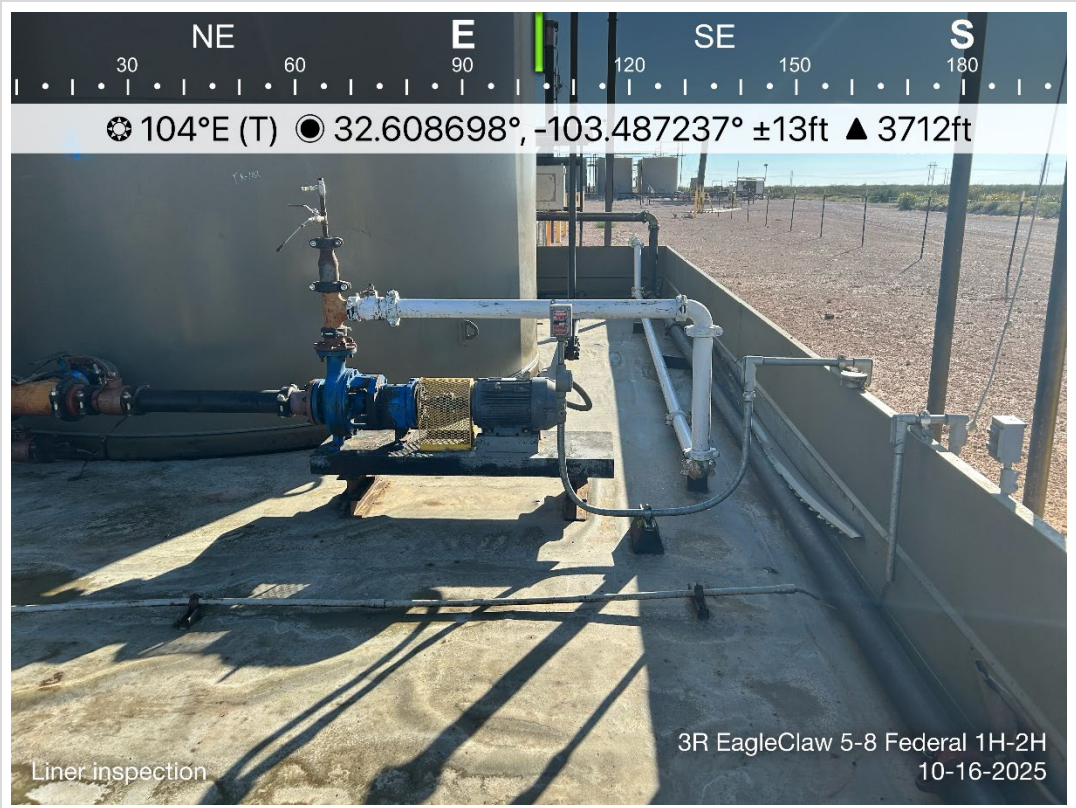
Reasons

No reasons found for this submission.

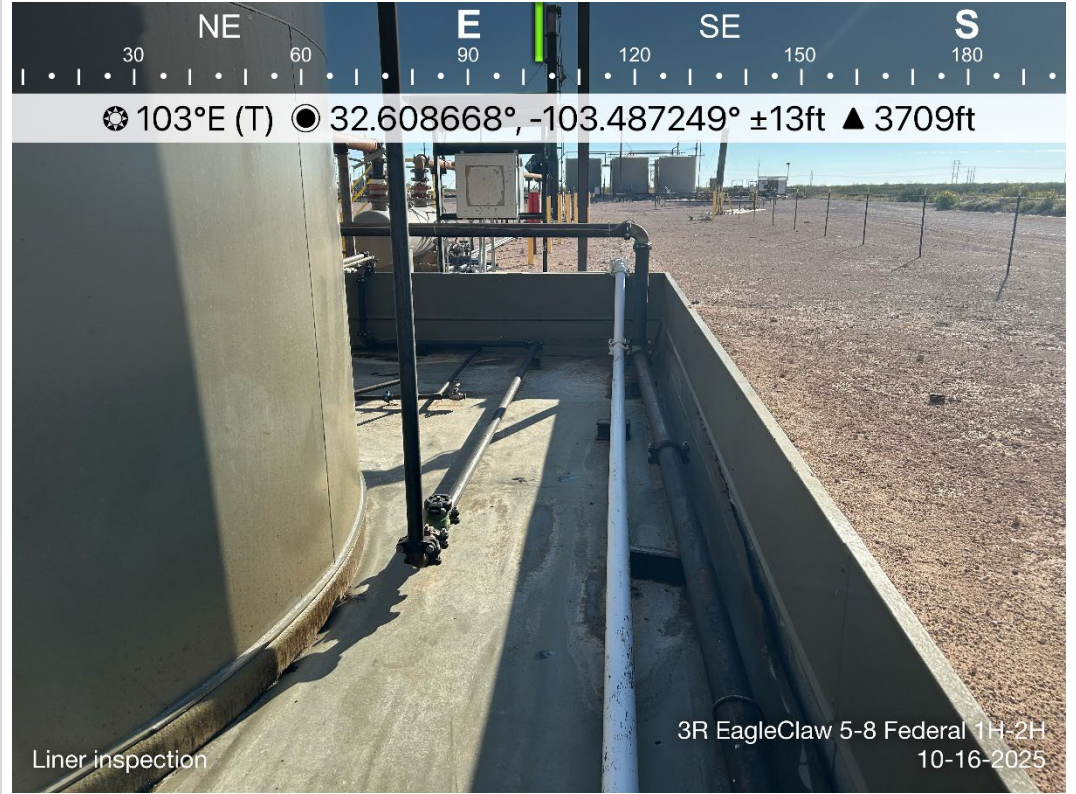
[Go Back](#)

APPENDIX C

Photographic Documentation



TETRA TECH, INC. PROJECT NO. 212C-AU-00695	DESCRIPTION	View east. Current lined containment conditions: no rips, holes, or tears observed.	1
	SITE NAME	EagleClaw 5-8 Federal 1H-2H Production Facility	10/16/2025



TETRA TECH, INC. PROJECT NO. 212C-AU-00695	DESCRIPTION	View east. Current lined containment conditions: no rips, holes, or tears observed.	2
	SITE NAME	EagleClaw 5-8 Federal 1H-2H Production Facility	10/16/2025



TETRA TECH, INC. PROJECT NO. 212C-AU-00695	DESCRIPTION	View east. Current lined containment conditions: no rips, holes, or tears observed.	3
	SITE NAME	EagleClaw 5-8 Federal 1H-2H Production Facility	10/16/2025



TETRA TECH, INC. PROJECT NO. 212C-AU-00695	DESCRIPTION	View south. Current lined containment conditions: no rips, holes, or tears observed.	4
	SITE NAME	EagleClaw 5-8 Federal 1H-2H Production Facility	10/16/2025



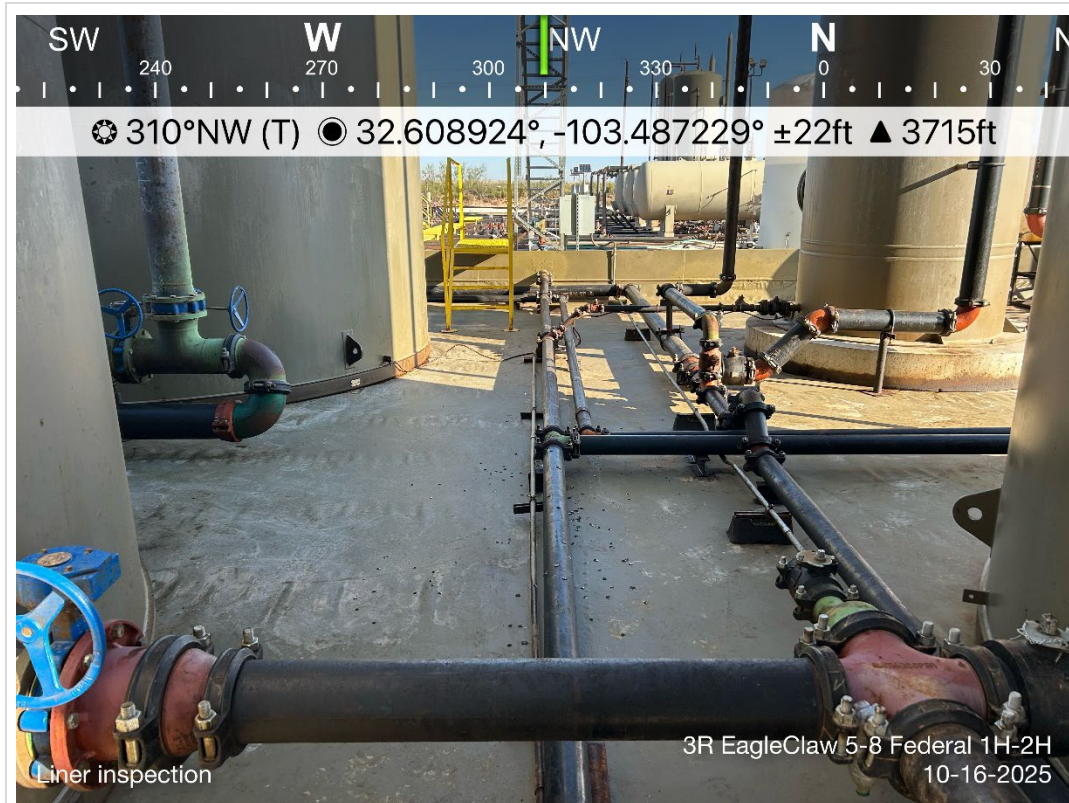
TETRA TECH, INC. PROJECT NO. 212C-AU-00695	DESCRIPTION	View northwest. Current lined containment conditions: no rips, holes, or tears observed.	5
	SITE NAME	EagleClaw 5-8 Federal 1H-2H Production Facility	10/16/2025



TETRA TECH, INC. PROJECT NO. 212C-AU-00695	DESCRIPTION	View south. Current lined containment conditions: no rips, holes, or tears observed.	6
	SITE NAME	EagleClaw 5-8 Federal 1H-2H Production Facility	10/16/2025



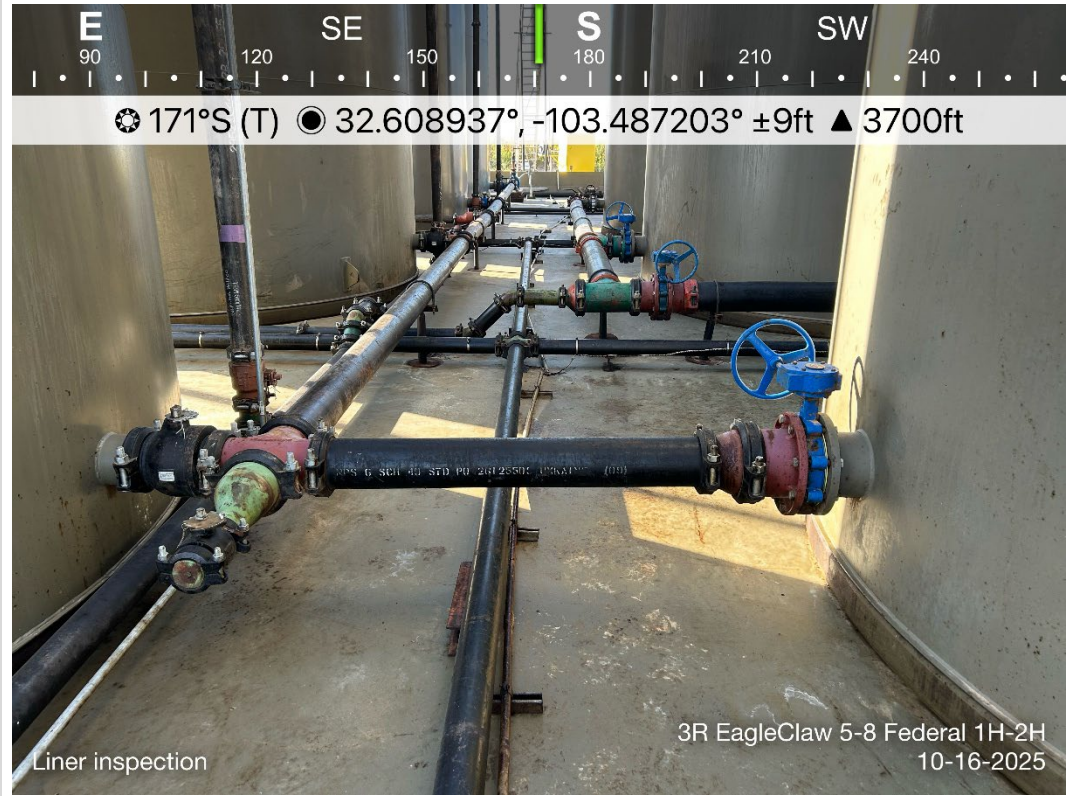
TETRA TECH, INC. PROJECT NO. 212C-AU-00695	DESCRIPTION	View south. Current lined containment conditions: no rips, holes, or tears observed.	7
	SITE NAME	EagleClaw 5-8 Federal 1H-2H Production Facility	10/16/2025



TETRA TECH, INC. PROJECT NO. 212C-AU-00695	DESCRIPTION	View northwest. Current lined containment conditions: no rips, holes, or tears observed.	8
	SITE NAME	EagleClaw 5-8 Federal 1H-2H Production Facility	10/16/2025



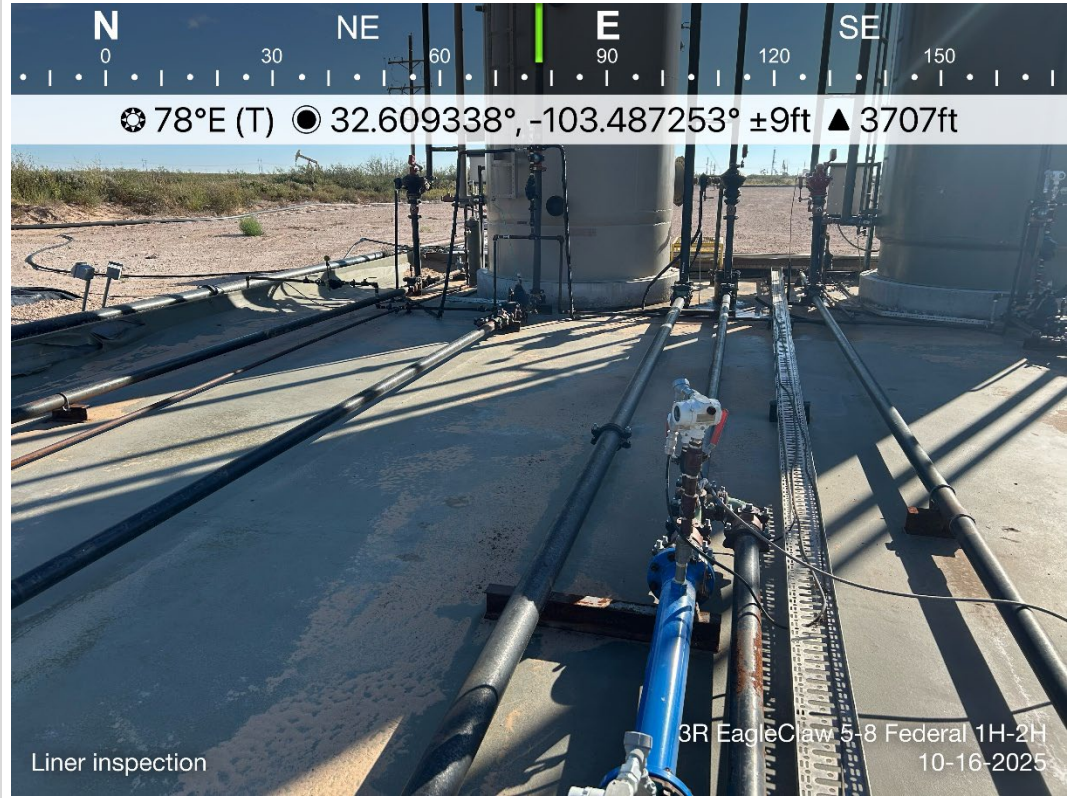
TETRA TECH, INC. PROJECT NO. 212C-AU-00695	DESCRIPTION	View south. Current lined containment conditions: no rips, holes, or tears observed.	9
	SITE NAME	EagleClaw 5-8 Federal 1H-2H Production Facility	10/16/2025



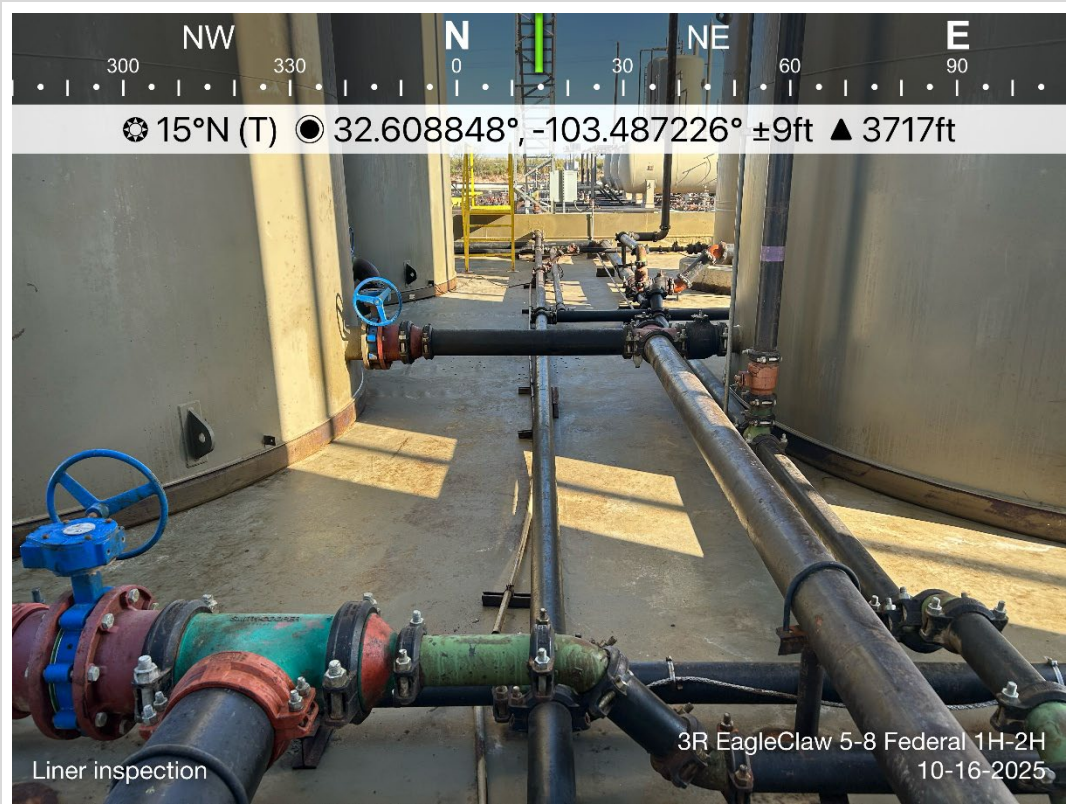
TETRA TECH, INC. PROJECT NO. 212C-AU-00695	DESCRIPTION	View south. Current lined containment conditions: no rips, holes, or tears observed.	10
	SITE NAME	EagleClaw 5-8 Federal 1H-2H Production Facility	10/16/2025



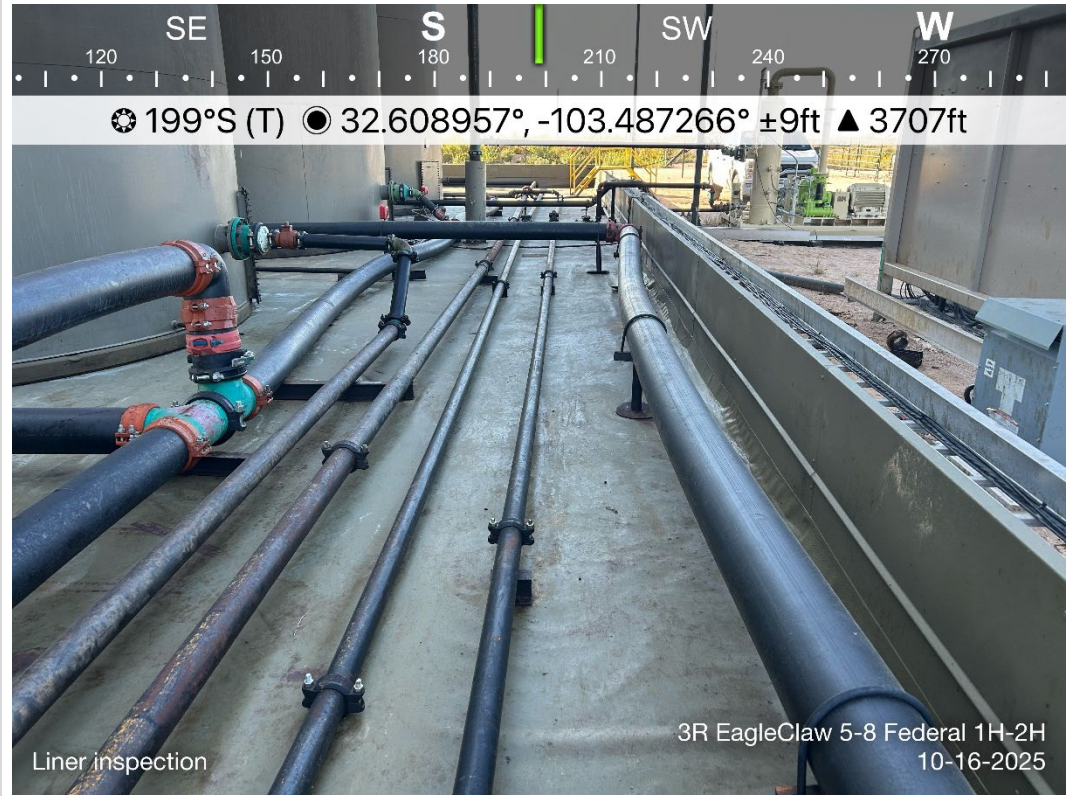
TETRA TECH, INC. PROJECT NO. 212C-AU-00695	DESCRIPTION	View south. Current lined containment conditions: no rips, holes, or tears observed.	11
	SITE NAME	EagleClaw 5-8 Federal 1H-2H Production Facility	10/16/2025



TETRA TECH, INC. PROJECT NO. 212C-AU-00695	DESCRIPTION	View east. Current lined containment conditions: no rips, holes, or tears observed.	12
	SITE NAME	EagleClaw 5-8 Federal 1H-2H Production Facility	10/16/2025



TETRA TECH, INC. PROJECT NO. 212C-AU-00695	DESCRIPTION	View north. Current lined containment conditions: no rips, holes, or tears observed.	13
	SITE NAME	EagleClaw 5-8 Federal 1H-2H Production Facility	10/16/2025



TETRA TECH, INC. PROJECT NO. 212C-AU-00695	DESCRIPTION	View south. Current lined containment conditions: no rips, holes, or tears observed.	14
	SITE NAME	EagleClaw 5-8 Federal 1H-2H Production Facility	10/16/2025

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS

Action 526311

QUESTIONS

Operator: 3R Operating, LLC 20405 State Highway 249 Houston, TX 77070	OGRID: 331569
	Action Number: 526311
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2526942638
Incident Name	NAPP2526942638 EAGLECLAW 5-8 FEDERAL 1H-2H PRODUCTION FACILITY @ FAPP2428847412
Incident Type	Oil Release
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2428847412] EAGLECLAW 5-8 FEDERAL 1H-2H PRODUCTION FACILITY

Location of Release Source

Please answer all the questions in this group.

Site Name	EagleClaw 5-8 Federal 1H-2H Production Facility
Date Release Discovered	09/25/2025
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	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	Cause: Equipment Failure Valve Crude Oil Released: 300 BBL Recovered: 300 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)	All fluid contained within lined containment

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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 526311

QUESTIONS (continued)

Operator: 3R Operating, LLC 20405 State Highway 249 Houston, TX 77070	OGRID: 331569
	Action Number: 526311
	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: Samantha Allen Title: Tetrattech Email: Samantha.allen@tetrattech.com Date: 11/13/2025
--	---

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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 526311

QUESTIONS (continued)

Operator: 3R Operating, LLC 20405 State Highway 249 Houston, TX 77070	OGRID:
	331569
	Action Number:
	526311
Action Type:	
[C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

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 51 and 75 (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 1 and 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 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 1 and 5 (mi.)
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	Yes
<i>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.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<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>	
On what estimated date will the remediation commence	10/16/2025
On what date will (or did) the final sampling or liner inspection occur	10/16/2025
On what date will (or was) the remediation complete(d)	10/16/2025
What is the estimated surface area (in square feet) that will be remediated	17727
What is the estimated volume (in cubic yards) that will be remediated	0
<i>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.</i>	
<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>	

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS, Page 4

Action 526311

QUESTIONS (continued)

Operator: 3R Operating, LLC 20405 State Highway 249 Houston, TX 77070	OGRID: 331569
	Action Number: 526311
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

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>	
Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
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: Samantha Allen Title: Tetrattech Email: Samantha.allen@tetrattech.com Date: 11/13/2025
<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>	

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS, Page 6

Action 526311

QUESTIONS (continued)

Operator: 3R Operating, LLC 20405 State Highway 249 Houston, TX 77070	OGRID: 331569
	Action Number: 526311
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	514568
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	10/16/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	13987

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	17727
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	On October 16, 2025, Tetra Tech personnel were on site to perform an inspection of the liner within the containment area of the EagleClaw 5-8 Federal 1H-2H Production Facility. 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 anchored on the interior. At the time of the inspection, the liner was intact and had the ability to contain the documented release.

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: Samantha Allen Title: Tetrattech Email: Samantha.allen@tetrattech.com Date: 11/13/2025
--	---

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

CONDITIONS

Action 526311

CONDITIONS

Operator: 3R Operating, LLC 20405 State Highway 249 Houston, TX 77070	OGRID: 331569
	Action Number: 526311
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	We have received your Remediation Closure Report for Incident #nAPP2526942638 Eagle Claw 5-8 Federal 1H-2H Production Facility, thank you. This Remediation Closure Report is approved.	12/8/2025