

Incident ID	NCH1903264560
District RP	1RP-5310
Facility ID	
Application ID	pCH1903264781

## 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.*

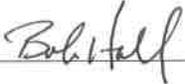
- A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- Laboratory analyses of final sampling (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: **Bob Hall**

Title: **Environmental Manager**

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



Date: **10/22/2019**

email: **bhall@btaoil.com**

Telephone: **432-682-3753**

**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: \_\_\_\_\_



July 22, 2019

SMA #5E28395, BG3

NMOCD District 1  
1625 N. French Drive  
Hobbs, New Mexico 88240

**RE: LINER INSPECTION REPORT  
MESA 8105 JV-P #11H CENTRAL TANK BATTERY (1RP-5310)**

To Whom it May Concern:

Souder, Miller & Associates (SMA) is pleased to submit this letter report on behalf of BTA Oil Producers, LLC (BTA) summarizing the liner inspection that occurred due to the Mesa 8105 JV-P #11H Central Tank Battery release. The site is located in Section 1, T26S, R32E (N32.06587/W-103.62999) Lea County, New Mexico, on BLM land.

**Site Characterization**

On December 14, 2018, there was a failure of communication between the water pumps and the water tanks at the Mesa 8105 JV-P #11H Central Tank Battery location. This caused the tanks to overflow, and resulted in the release of 544 bbls of produced water and 6 bbls of crude oil inside the lined secondary containment of the tank battery. Initial response activities were conducted by the operator and included source elimination and site stabilization, which recovered approximately 544 bbls of produced water and 6 bbls of crude oil. The tanks and containment were then pressure washed.

Based upon New Mexico Office of the State Engineer (NMOSE) and United States Geological Survey (USGS) well data, depth to groundwater in the area is estimated to be between 135 and 158 feet below grade surface (bgs). There are no water sources within ½-mile of the location, according to the NMOSE and USGS water well databases (Appendix C). The nearest significant watercourse is an unnamed intermittent stream, located approximately 970 feet to the north.

Based on the information presented herein, the applicable NMOCD Closure Criteria for this site is for a groundwater depth of >100 feet bgs.

**Liner Integrity**

At the request of BTA, SMA conducted a liner integrity inspection per the requirements of 19.15.29.11.A(5)(a) NMAC. NMOCD was notified on July 8, 2019 that the liner inspection was to occur, and SMA conducted the inspection on July 11, 2019. After a thorough visual inspection of the liner within the tank battery containment, the liner appeared to be intact and had the ability to contain the leak in question. The tank from which the release occurred was identified, and SMA verified that the release did not occur outside of the lined containment. A photo log and field notes of the inspection is included in Appendix A.

SMA recommends no further action for this release.

Souder, Miller and Associates appreciates the opportunity to provide environmental services to you. If you have any questions or comments concerning this report, please feel free to call Melodie R. Sanjari at 574-370-9782.

Sincerely,  
Souder, Miller & Associates



Melodie R. Sanjari  
Project Scientist



Shawna Chubbuck  
Senior Scientist

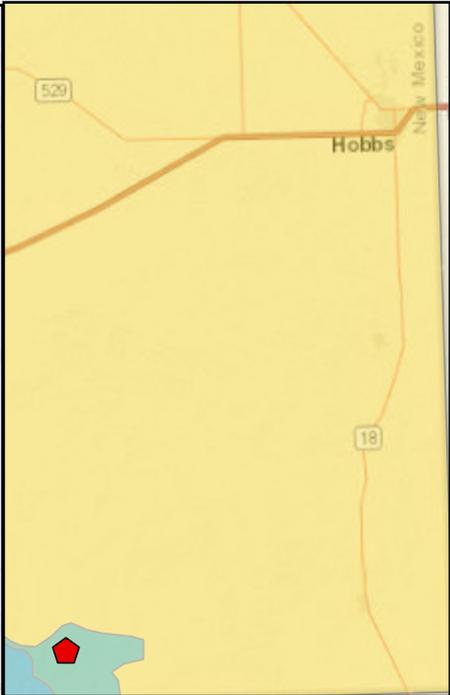
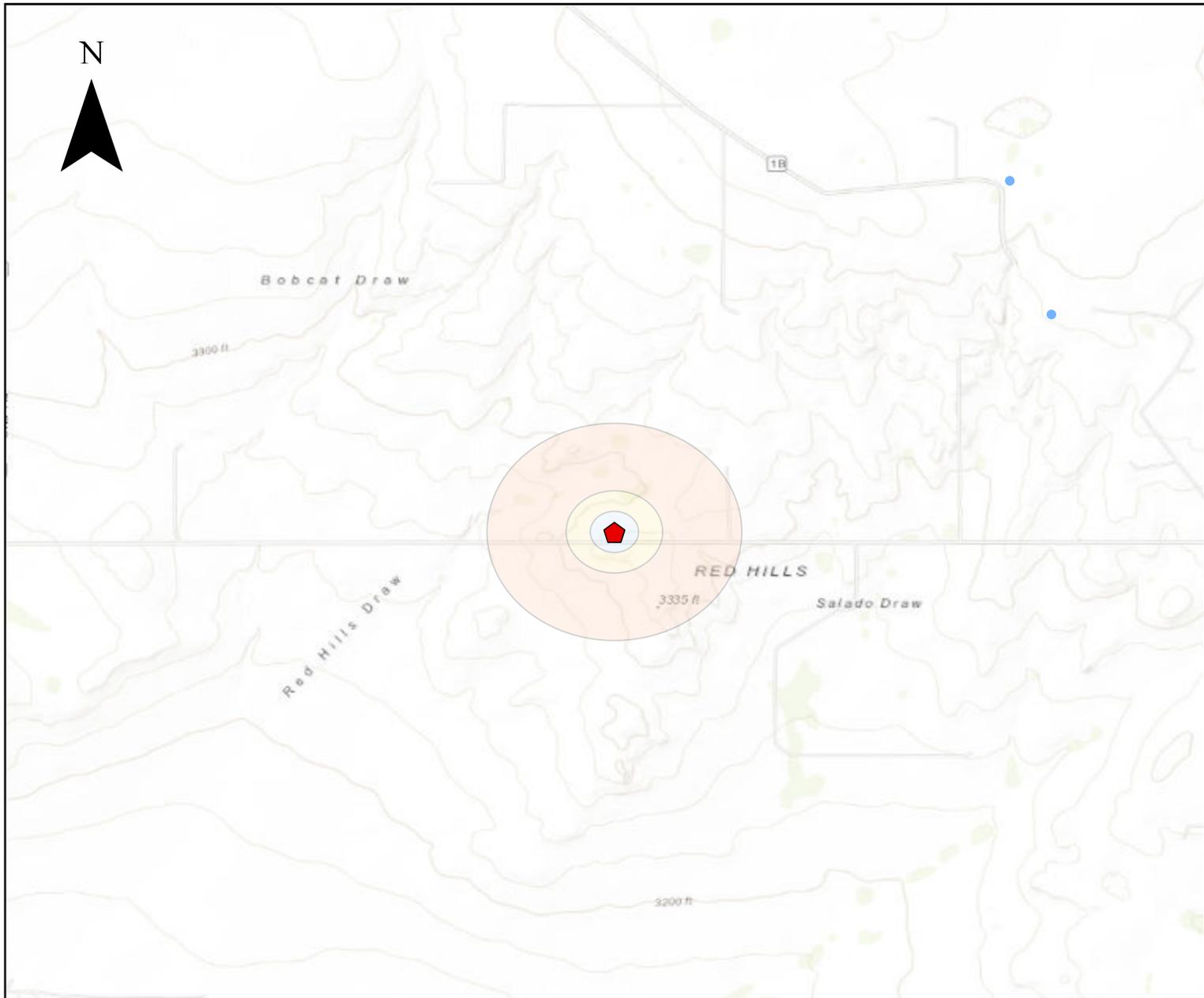
## **Appendices**

Appendix A: Photo Log & Field Notes

Appendix B: C141

Appendix C: Water Well Data

## FIGURES



**Legend**

- Point of Release
- OSE Waterwells
- USGS Waterwells
- .5 Mile
- 1000 Feet
- 500 Feet

**Karst Potential**

- Low
- High
- Medium

0 0.25 0.49 0.99 Miles

*Regional Vicinity & Wellhead Protection Map  
Mesa 8105 JV-P #11H CTB - BTA Oil Producers, LLC  
Lea County, New Mexico*

*Figure 1*

Revisions		
By: _____	Date: _____	Descr: _____
By: _____	Date: _____	Descr: _____

Drawn	MRS
Date	7/16/2019
Checked	_____
Approved	_____



201 South Halaguena Street  
Carlsbad, New Mexico 88221  
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- Point of Release
- Lined Containment



Site and Sample Locations  
 Mesa JV-P #11H CTB - BTA Oil Producer, LLC  
 Lea County, New Mexico

Figure 2

Revisions

By: \_\_\_\_\_ Date: \_\_\_\_\_ Descr: \_\_\_\_\_  
 By: \_\_\_\_\_ Date: \_\_\_\_\_ Descr: \_\_\_\_\_

Drawn MRS  
 Date 7/16/2019  
 Checked \_\_\_\_\_  
 Approved \_\_\_\_\_



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 Carlsbad, New Mexico 88221  
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**Appendix A**  
**PHOTO LOG & FIELD NOTES**







**Souder, Miller & Associates  
Liner Inspection Form**



Project Name: Mesa 8105 JV-P #11 Inspection Date: 7/11/19  
Client Name: BTA  
Client Representative(s): Bob Hall  
SMA Inspector(s): MRS JJI  
Project Location: NI 265 32E Lea Latitude: 32.06587 Longitude: -103.62999

**Inspection Parameters as Outlined in 19.15.29.11.A(5) NMAC**

**PRIOR TO INSPECTION:**

Two (2) Business Day Notification of Inspection to Appropriate Division Office (Y/N): Y  
Date of Notice: 7/8

Material Covering Liner Removed by Client (Y/N): Y

Affected Areas Exposed by Client (Y/N): Y

**INSPECTION:**

Liner Thoroughly Inspected for Damage (Y/N): Y

All Damaged Areas Observed Marked in **White Paint** on Liner  
Photos and Field Notes Detailing Failures Attached to This Form

**To Be Completed by Client Representative:**

Can Responsible Party Demonstrate:  
Liner Integrity Was Maintained (per SMA Inspection) (Y/N): Y  
Release Was Contained to Lined Containment Area (Y/N): Y  
Liner Was Able to Contain the Leak (Y/N): Y

**If YES:**

Certify on Form C-141 That Liner Remains Intact

**If NO to Any of Above:**

Responsible Party Must Delineate Horizontal & Vertical Extent

Depending on Release:

See Table 1 19.15.29.12 NMAC

See Subparagraph (e) Paragraph (5) of Subsection A 19.15.29.11 NMAC

**Additional Comments:**

See field notes

**SMA INSPECTOR SIGNATURE**

**CLIENT REPRESENTATIVE**

Date: 7/11/19

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

**APPENDIX B**  
**C141**

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Form C-141  
Revised August 24, 2018  
Submit to appropriate OCD District office

Incident ID	NCH1903264560
District RP	1RP-5310
Facility ID	
Application ID	pCH1903264781

## Release Notification

### Responsible Party

Responsible Party: BTA Oil Producers, LLC	OGRID: 260297
Contact Name: Bob Hall	Contact Telephone: 432-682-3753
Contact email: bhall@btaoil.com	Incident # NCH1903264560 MESA 8105 JV_P #11H CENTRAL TANK BATTERY @ 30-025-42847
Contact mailing address: 104 S. Pecos St., Midland, TX 79701	

### Location of Release Source

Latitude: 32.06587° Longitude: -103.62999°

(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Mesa 8105 JV-P #11H Central Tank Battery	Site Type: Tank Battery
Date Release Discovered: 12/14/2018	API# (if applicable) Nearest well: Mesa #11H API #30-025-42847

Unit Letter	Section	Township	Range	County
N	1	26S	32E	Lea

Surface Owner:  State  Federal  Tribal  Private (Name: \_\_\_\_\_)

### Nature and Volume of Release

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

<input checked="" type="checkbox"/> Crude Oil	Volume Released (bbls) 6 BBL	Volume Recovered (bbls) 6 BBL
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 544 BBL	Volume Recovered (bbls) 544 BBL
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

#### Cause of Release

Failure of communication to PLC between water pumps and tanks caused the tanks to overflow into the lined secondary containment.

State of New Mexico  
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?  The spill volume was greater than 25 BBL, which the NMOCD Rules define as a major release.
---	--

If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?  
 On the morning of 12/16/2018, I received a text notification that was the initial notification of the release from the field. A text message was prepared and sent via cellphone to Shelly Tucker, BLM, and Christina Hernandez, NMOCD, by Bob Hall, BTA Oil, on 12/16/2018 at 12:04pm and 12:12pm, respectively.

### 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.
- The impacted area has been secured to protect human health and the environment.
- Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.
- All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not been undertaken, explain why:  
  
**Additional Initial Response Details (also provided in referenced text notifications, above):** The entire volume of fluid was recovered and returned to the tanks to be pumped away. Horsepower Electric corrected the PLC issue on 12/14/2018. On 12/15/2018, the containment was power washed by Do'Er Rite.

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

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

Printed Name: Bob Hall Title: Environmental Manager

Signature: Bob Hall Date: 12/18/2018

email: bhall@btaoil.com Telephone: 432-682-3753

**OCD Only**

Received by: **RECEIVED**  
 By **CHernandez at 5:52 pm, Feb 01, 2019** Date: \_\_\_\_\_

**APPENDIX C  
WATER WELL DATA**



---

*New Mexico Office of the State Engineer*  
**Water Column/Average Depth to Water**

---

(quarters are 1=NW 2=NE 3=SW 4=SE)  
(quarters are smallest to largest) (NAD83 UTM in meters)

No records found.

**UTMNAD83 Radius Search (in meters):**

**Easting (X):** 629318

**Northing (Y):** 3548558

**Radius:** 5000

---

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.

---

7/16/19 2:24 PM

WATER COLUMN/ AVERAGE  
DEPTH TO WATER



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Groundwater

Geographic Area:

United States

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Groundwater levels for the Nation

### Search Results -- 1 sites found

site\_no list =

- 320449103360101

Minimum number of levels = 1

[Save file of selected sites](#) to local disk for future upload

### USGS 320449103360101 25S.33E.31.44424

Available data for this site

Groundwater: Field measurements

GO

Lea County, New Mexico

Hydrologic Unit Code --

Latitude 32°04'49", Longitude 103°36'01" NAD27

Land-surface elevation 3,383 feet above NAVD88

This well is completed in the Chinle Formation (231CHNL) local aquifer.

#### Output formats

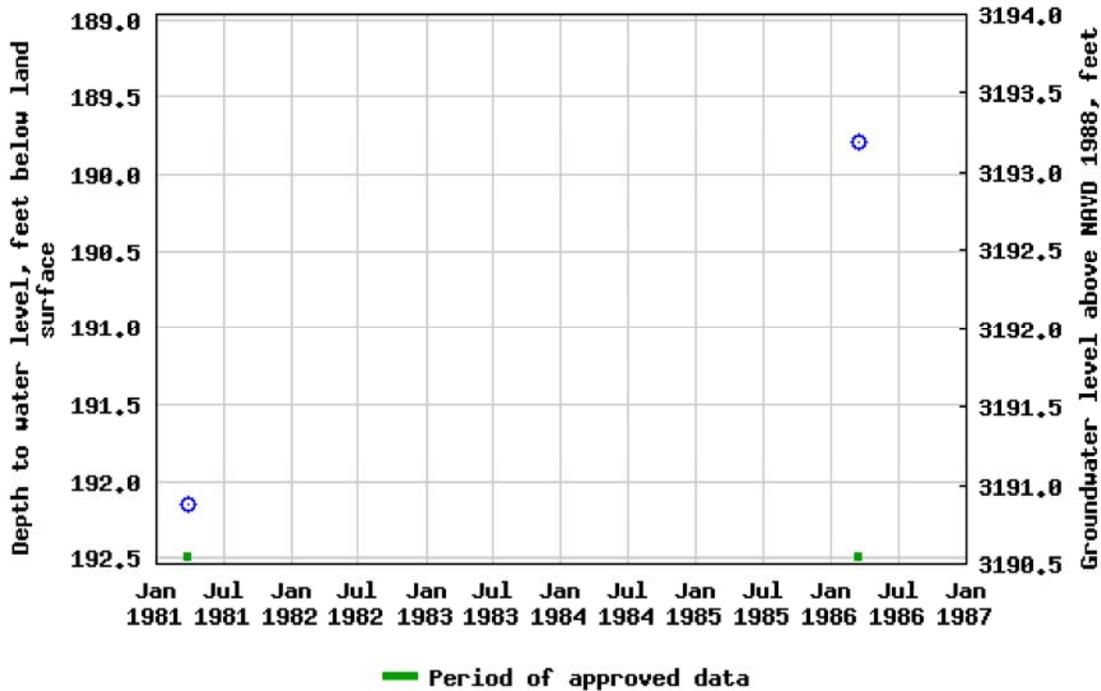
[Table of data](#)

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[Graph of data](#)

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1.27 1.19 nadww01



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- 320504103361801

Minimum number of levels = 1

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### USGS 320504103361801 25S.33E.31.24232

Available data for this site

Groundwater: Field measurements

GO

Lea County, New Mexico

Hydrologic Unit Code 13070001

Latitude 32°05'21.6", Longitude 103°36'12.7" NAD83

Land-surface elevation 3,403.00 feet above NGVD29

The depth of the well is 320 feet below land surface.

This well is completed in the Ogallala Formation (121OGLL) local aquifer.

#### Output formats

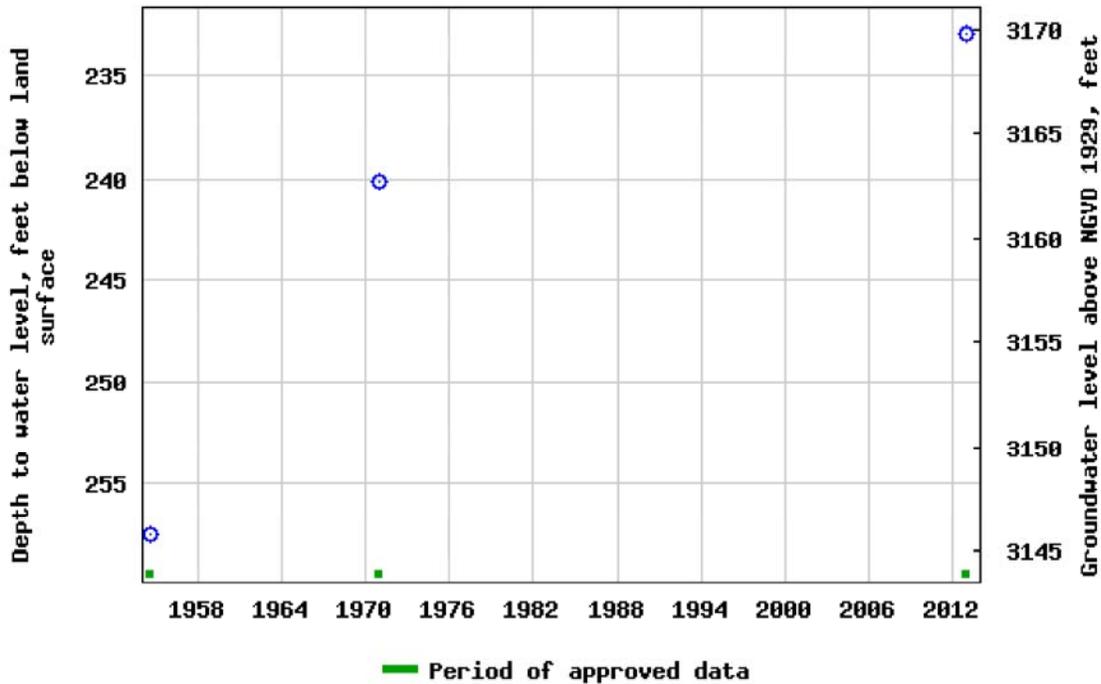
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