


C&M Services, LLC. Natural Resources Department

MAILING: P.O. BOX 3470 HOBBS, NM 88241
 HOBBS OFFICE: 2607 W. MARLAND BLVD. HOBBS, NM 88240
 CARLSBAD OFFICE: 312 N. CANAL ST STE C, CARLSBAD NM, 88220

10/17/19

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

RE: Remediation Closure Report for the Rojo 7811 Fee Com 10-13 Tank Battery Release (1RP-5699), Lea County, New Mexico

To whom it concerns:

On behalf of BTA Oil Producers, LLC (BTA), C&M Services, LLC. (C&M) has prepared this Liner Inspection/Closure Report that describes the liner inspection related to the release of liquids related to oil and gas production activities at the Rojo 7811 Fee Com 10-13 Tank Battery site. The release site is in Unit A, Section 27, Township 25S, Range 33E, Lea County, New Mexico, on Private land.

Release History

On September 9, 2019, a release was discovered at the Rojo 7811 Fee Com 10-13 Tank Battery site due to a loss of power that disabled the high tank alarm. Initial response activities were conducted by BTA and included source elimination and site security; containment; and site stabilization activities, which recovered approximately 90 barrels of fluid. Map 1 illustrates the vicinity and site location. The initial C-141 form is included in Appendix A.

Release Location Information

Table 1: Release Information			
API Number	30-025-44459	Source of Release	A produced water tank overflowed due to power failure disabling high tank alarm.
Remediation Permit Number	1RP-5699	Released Material	Produced Water
Estimated Date of Release	9/9/19	Released Volume	90 bbls
NMOCD Report Date	9/9/19	Recovered Volume	90 bbls
NMOCD Closure Criteria	>100 feet to groundwater	Net Release	0 bbls

The Rojo 7811 Fee Com 10-13 Tank Battery is located approximately 21 miles west of Jal, New Mexico on privately-owned land at an elevation of approximately 3,344 feet above mean sea level (amsl).

There are no known water sources within ½-mile of the location, according to the New Mexico Office of the State Engineer (NMOSE) online water well database. Depth to groundwater in the area is estimated to be approximately 130 feet below grade surface (bgs). The nearest significant watercourse is the Pecos River, located approximately 26 miles to the southwest. Map 2



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illustrates the site with 100, 200, and 300-foot radii to indicate that it does not lie within a sensitive area as described in 19.15.29.12.C(4) NMAC.

Liner Inspection and Documentation

On Oct.15, 2019 a full visual inspection of the liner was conducted by C&M personnel. The liner was found to be completely intact. Please see attached Photo log (Appendix C).

Conclusion

Based on the recovery of all the released liquids and the integrity of the liner being intact, BTA requests closure of this spill. The final C-141 is enclosed in Appendix A. If you have any questions or comments concerning this report, please call Jacqui Harris at 575-496-0780.

Submitted by:
C&M Services, LLC, Natural Resource Department

A handwritten signature in black ink that reads 'Jacqui Harris'.

Jacqui Harris
Environmental Compliance Manager



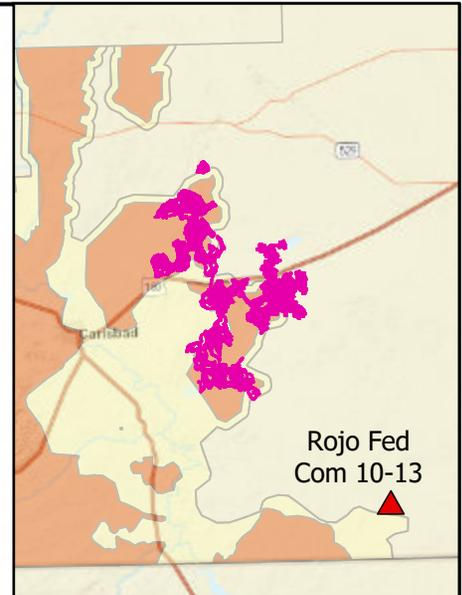
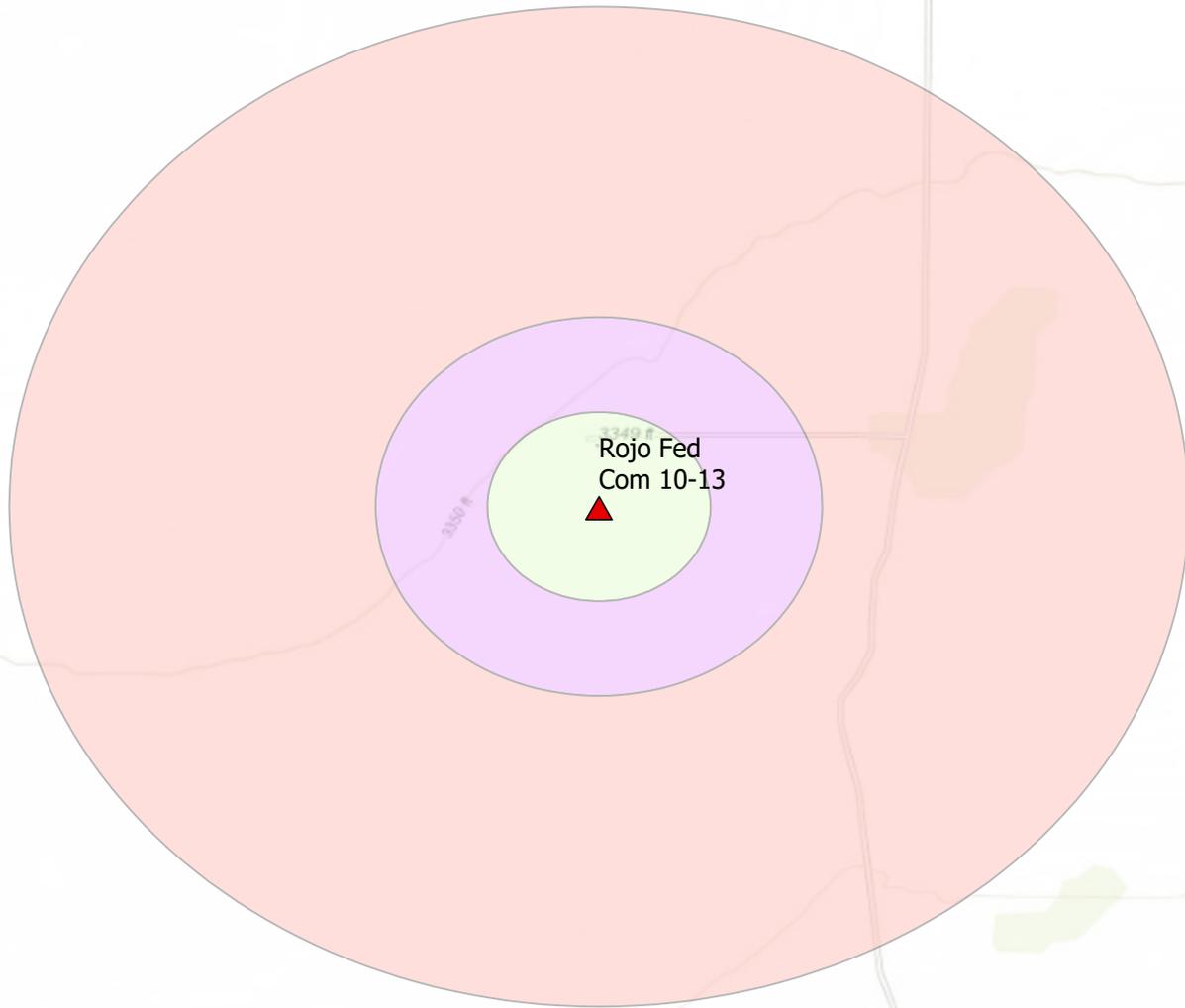
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Map 1



LEGEND

- LEA_USGS WATERWELLS
- OSE WATERWELLS
- ▲ POINT_OF_RELEASE

BUFFER_DISTANCE

- 500 FEET
- 1000 FEET
- 2640 FEET

CAVE KARST POTENTIAL

- HIGH
- MEDIUM
- LOW

MINE WORKINGS

1,000 Feet

Regional Vicinity & Wellhead Protection Map

Map 1

BTA- ROJO FED COM 10-13 TANK BATTERY



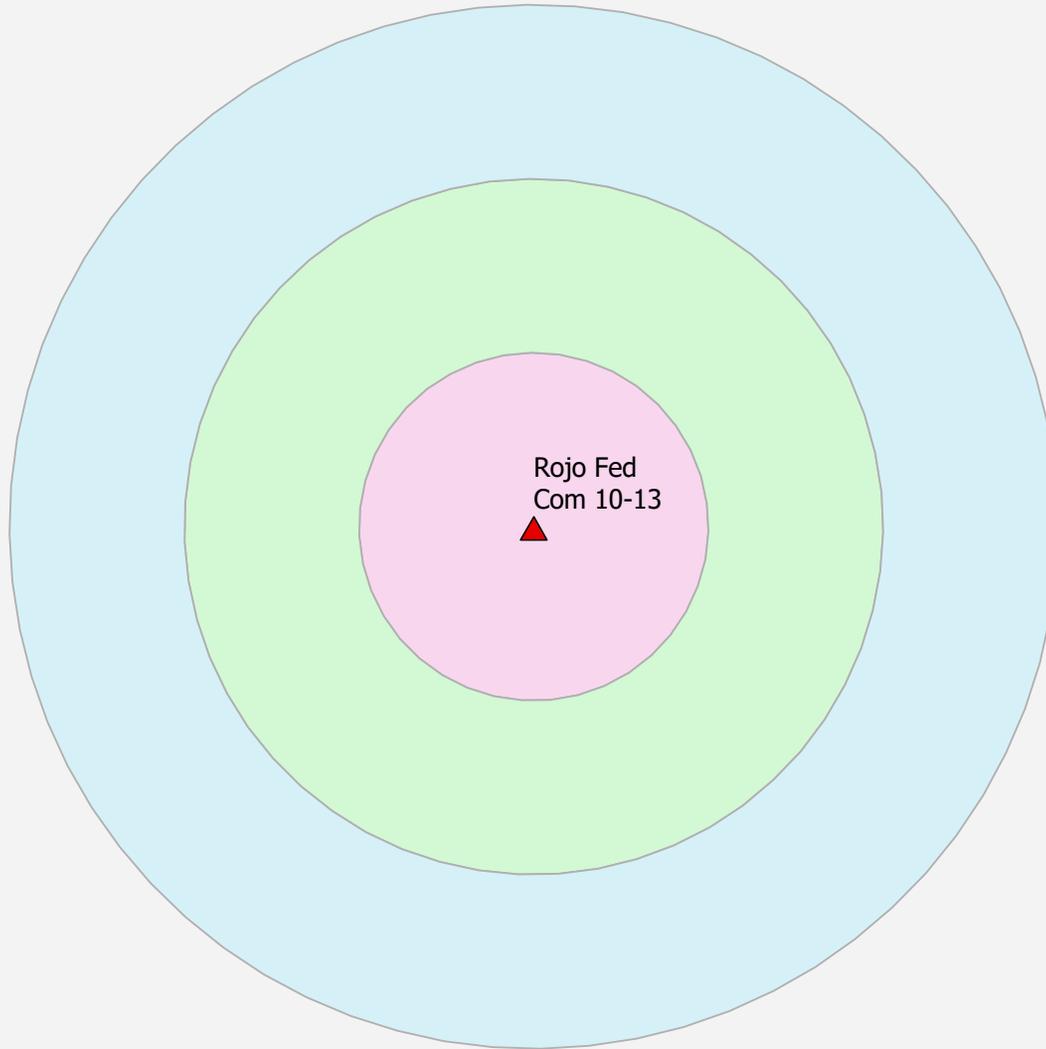
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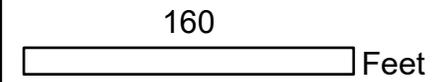
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Map 2



LEGEND

- SPRINGS SEEPS
 - STREAMS CANALS
 - RIVERS
 - - - FLOWLINES SENM
 - LAKES PLAYAS
 - ▨ FEMA FLOOD ZONES 2011
 - ▲ POINT_OF_RELEASE
- BUFFER_DISTANCE**
- 100 FEET
 - 200 FEET
 - 300 FEET



Surface Water Protection Map

Map 2

BTA - ROJO FED COM 10-13 TANK BATTERY

SEW Author
10/3/2019 Date





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Appendix A

Initial & Closure

C-141

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

State of New Mexico
Energy Minerals and Natural
Resources Department

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

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

Incident ID	NRM1927035828
District RP	1RP-5699
Facility ID	
Application ID	pRM1927035391

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 # <i>(assigned by OCD)</i>
Contact mailing address: 104 S. Pecos St., Midland, TX 79701	

Location of Release Source

Latitude: **32.10838°** Longitude: **-103.55314°**

(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Rojo 7811 Fee Com 10-13 Tank Battery	Site Type: Tank Battery
Date Release Discovered: 9/9/2019	API# <i>(if applicable)</i> Nearest well: Rojo 7811 Fee Com #11H API #30-025-44459

Unit Letter	Section	Township	Range	County
A	27	25S	33E	Lea

Surface Owner: State Federal Tribal Private *(Name: CAML Ltd, PO Box 3157, San Angelo, TX 76902)*

Nature and Volume of Release

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

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 90 BBL	Volume Recovered (bbls) 90 BBL
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

Power was lost on the PLC, so no high tank alarm was sent out until power was restored to the PLC on the morning of 9/9/2019. A water tank overflowed 90 BBL of produced water into the lined containment of the tank battery. The produced water was completely recovered with a vacuum truck from the lined containment and returned to the tank, ready to be pumped to disposal.

Incident ID	NRM1927035828
District RP	1RP-5699
Facility ID	
Application ID	pRM1927035391

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 NMOCD Rules define a "major release" as an unauthorized release of a volume greater than 25 BBL of fluid.
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? An e-mail containing this C-141 Report will be sent directly to Jim Griswold and personnel at the Hobbs NMOCD office after completing the online submittal and fee payment.	

Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
If all the actions described above have <u>not</u> been undertaken, explain why: <u>Additional Information:</u> This area is within lined secondary containment. A liner inspection will be required.
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: <u></u> Date: 9/9/2019 email: bhall@btaoil.com Telephone: 432-682-3753
<u>OCD Only</u> Received by: <u>Ramona Marcus</u> Date: <u>9/27/2019</u>

Incident ID	NRM1927035828
District RP	1RP-5699
Facility ID	
Application ID	pRM1927035391

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: 10/17/19

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: _____



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Appendix B

NMBOSE Well

Data



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

(NAD83 UTM in meters)

(In feet)

POD Number	POD Sub-Code	basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Distance	Depth Well	Depth Water	Water Column
C 02313	CUB	LE		2	3	3	26	25S	33E	636971	3552098*	1348	150	110	40
C 02373 CLW317846	O	CUB	LE	2	1	1	13	25S	33E	638518	3556544*	3760	625	185	440
C 02373 S	CUB	LE		1	2	1	13	25S	33E	638721	3556549*	3876	625	185	440
C 02285 POD1	CUB	LE		1	4	4	03	26S	33E	636613	3548855	4511	220	220	0
C 02290	CUB	LE		4	4	4	03	26S	33E	636538	3548770	4594	200	160	40
C 02288	CUB	LE		4	4	4	03	26S	33E	636646	3548758	4608	220	180	40
C 02286	CUB	LE		3	4	4	03	26S	33E	636470	3548714	4650	220	175	45
C 02287	C	LE		3	4	4	03	26S	33E	636427	3548708	4657	220		
C 02289	CUB	LE		4	4	4	03	26S	33E	636612	3548675*	4691	200	160	40

Average Depth to Water: **171 feet**
 Minimum Depth: **110 feet**
 Maximum Depth: **220 feet**

Record Count: 9

UTMNAD83 Radius Search (in meters):

Easting (X): 636509

Northing (Y): 3553365

Radius: 5000

*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.



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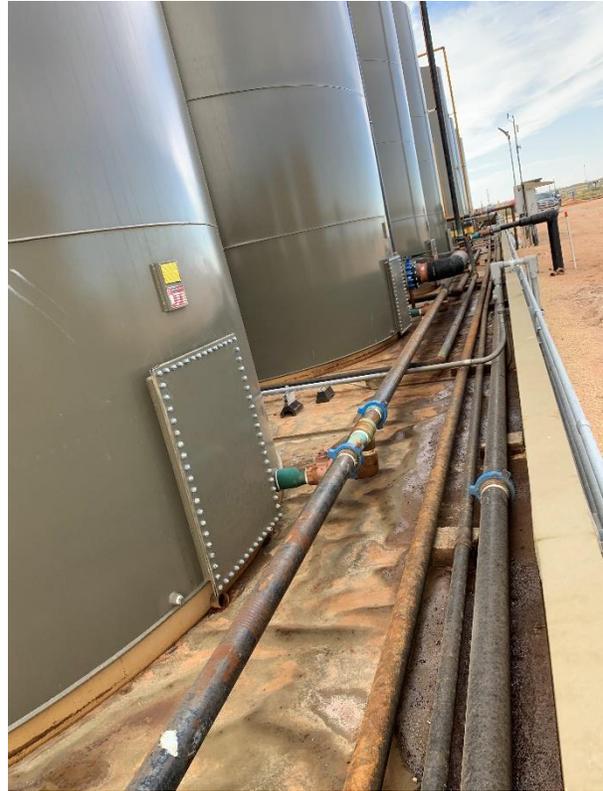
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Appendix C

Photo Log

Rojo 10-13 Tank Battery Liner Inspection Photos



Rojo 10-13 Tank Battery Liner Inspection Photos

