

Incident ID	NDHR1912859321
District RP	1RP-5464
Facility ID	fDHR1912858946
Application ID	pDHR1912859076

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, BG7

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

**RE: LINER INSPECTION REPORT
GRAMA 8817 JV-P TANK BATTERY (1RP-5464)**

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 Grama 8817 JV-P Tank Battery release. The site is located in Section 16, T22S, R34E (N32.38615/W-103.48183) Lea County, New Mexico, on State land.

Site Characterization

On April 26, 2019, a crude oil tank overflowed causing 6.25 bbls of oil to be released into 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 6 bbls of crude oil. The tanks and containment were then pressure washed and the residual oil recovered.

Based upon New Mexico Office of the State Engineer (NMOSE) well data, depth to groundwater in the area is estimated to be between 606 and 630 feet below grade surface (bgs). There are no known water sources within ½-mile of the location, according to the NMOSE online water well database (Appendix C). The nearest significant watercourse is an unnamed intermittent stream, located approximately 3,260 feet to the northeast.

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 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.

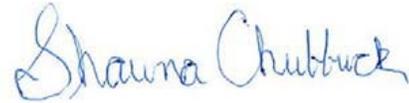
SMA recommends no further action for this release.

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

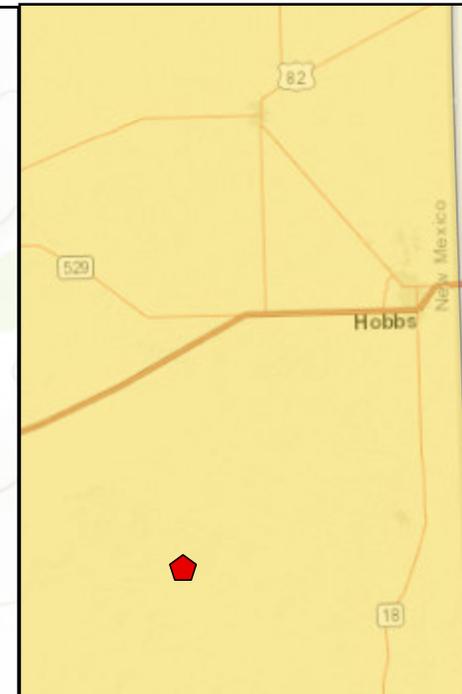
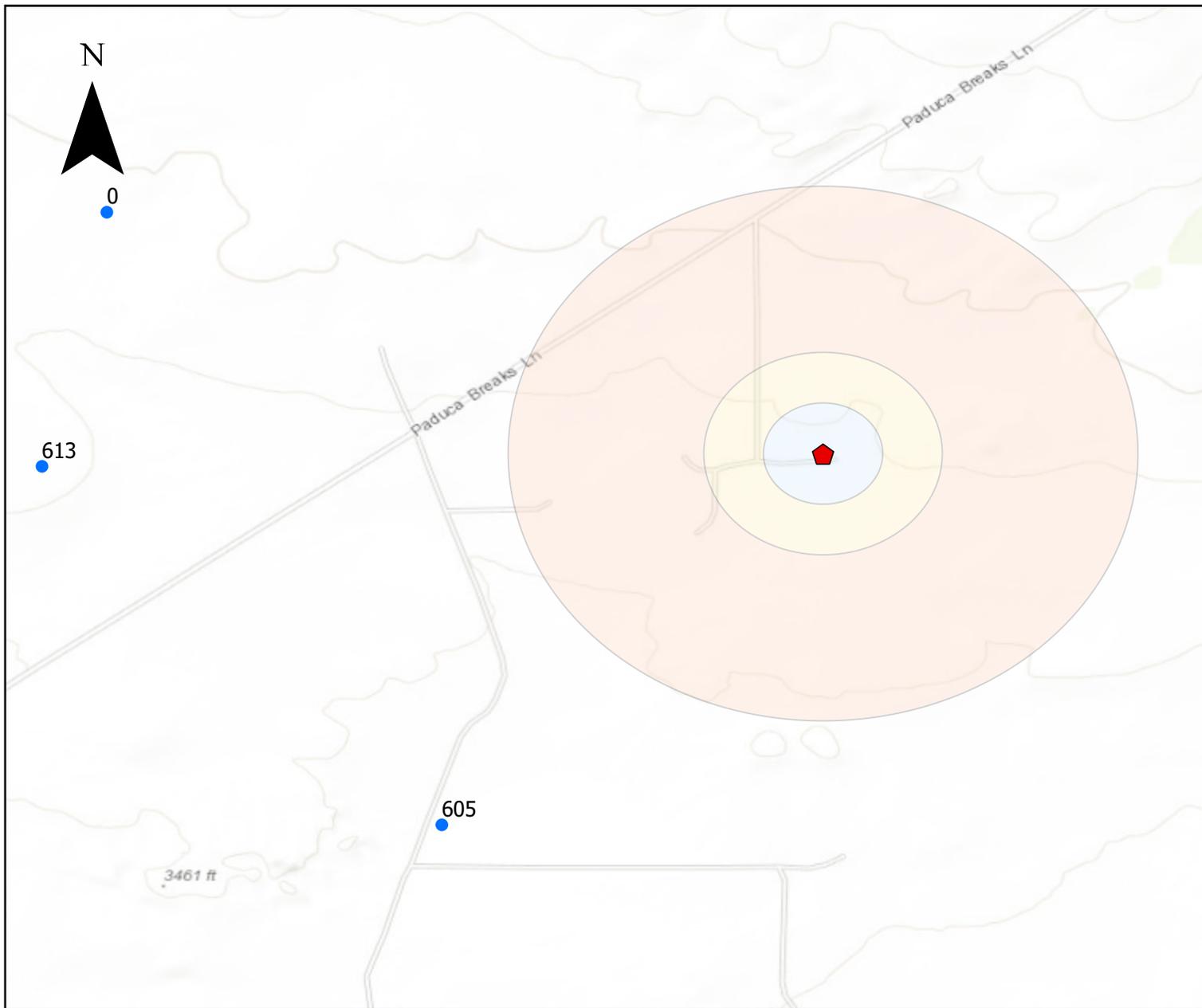
Appendices

Appendix A: Photo Log & Field Notes

Appendix B: C141

Appendix C: Water Well Data

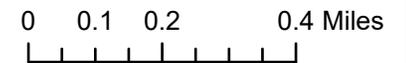
FIGURES



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

Karst Potential

- Low



*Regional Vicinity & Wellhead Protection Map
Grama Tank Battery - BTA Oil Producers, LLC
Lea County, New Mexico*

Figure 1

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

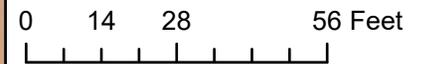
MRS	
Drawn	_____
Date	<u>7/16/2019</u>
Checked	_____
Approved	_____



201 South Halaguena Street
Carlsbad, New Mexico 88221
(575) 689-7040
Serving the Southwest & Rocky Mountains



- Point of Release
- Lined Containment



Site and Sample Locations
 Grama Tank Battery - 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 _____



201 South Halaguena Street
 Carlsbad, New Mexico 88221
 (575) 689-7040
 Serving the Southwest & Rocky Mountains

Appendix A
PHOTO LOG & FIELD NOTES







Souder, Miller & Associates
Liner Inspection Form



Project Name: Grama 8817 TB Inspection Date: 7/11/19
Client Name: BTA
Client Representative(s): Bob Hall on Site
SMA Inspector(s): MRS & JT
Project Location: M 16 22 S 34 E Latitude: 32.38615 Longitude: -103.48183

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: 7/8/19

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 N/A
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

M. Janjar
Date: 7/11/19

CLIENT REPRESENTATIVE

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	NDHR1912859321
District RP	1RP-5464
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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 # (assigned by OCD) NDHR1912859321
Contact mailing address: 104 S. Pecos St., Midland, TX 79701	

Location of Release Source

Latitude: 32.38615° Longitude: -103.48183°

(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Grama 8817 JV-P Tank Battery	Site Type: Tank Battery
Date Release Discovered: 4/26/2019	API# (if applicable) Nearest well: Grama C 8817 JV-P #1 API #30-025-34628 (P&A'd 7/9/2018)

Unit Letter	Section	Township	Range	County
M	16	22S	34E	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) 6.25 BBL (Based on volume recovered from lined containment.)	Volume Recovered (bbls) 6 BBL – Lined Containment
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	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

An oil tank overflowed into the lined secondary containment of the tank battery. The volume released is based on the amount of oil recovered via vacuum truck and adding an estimated quantity for a coat of residual oil that was manually cleaned from the tank battery equipment and liner surfaces.

State of New Mexico
Oil Conservation Division

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Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

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:
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: 4/29/2019 email: bhall@btaoil.com Telephone: 432-682-3753
<u>OCD Only</u> Received by: <u><i>Dylan Rose-Coss</i></u> Date: <u>05/08/2019</u>

**APPENDIX C
WATER 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	Code	POD Sub-basin	County	Q 64	Q 16	Q 4	Sec	Tw	Rng	X	Y	Distance	DepthWell	DepthWater	Water Column
CP 00865 POD1		CP	LE	2	2	3	20	22S	34E	641845	3583118	1483	885	605	280
CP 01722 POD1		CP	LE	4	4	2	18	22S	34E	640964	3584949	1966	1122	785	337
CP 01362 POD1		CP	LE	3	4	4	18	22S	34E	640809	3584182	1994	1032	613	419
Average Depth to Water:														667 feet	
Minimum Depth:														605 feet	
Maximum Depth:														785 feet	

Record Count: 3

UTMNAD83 Radius Search (in meters):

Easting (X): 642802

Northing (Y): 3584252

Radius: 2000

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 10:20 AM

WATER COLUMN/ AVERAGE DEPTH TO WATER