BTA OIL PRODUCERS 01/27/2020

Site Activities

&

Closure Request

1RP-5295

Rojo AE 7811 JV-P Federal 001H (Closest Well)

UL-D, Sec. 27-T25S-R33E

API # 30-025-43476

Prepared by:
Michael Alves/Katherine Beldon
Environmental Department
Expert Environmental
831 East Highland
Hobbs, NM 88240
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Mikealvest82126@gmail.com

BTA Oil Producers has retained Cajun Energy and Expert Environmental to address environmental issues for the site detailed herein.

The Rojo AE 7811 JV-P Federal 001H (API # 30-025-43476) is the closest well to this Production Facility and Tank Battery located West of Jal, in Lea County, NM. According to the New Mexico Office of the State Engineer, there is no known groundwater beneath this site (Appendix I).

On December 2, 2018, Cajun Energy was called to the present location to perform spill response activities. According to the C-141 filed with the BLM/NMOCD, the release was caused by a frozen dump valve resulting in a vessel pressuring up and blowing oil and produced water out of the "pop off". An estimated 350 BBL of oil and 35 BBL of produced water was released, of those volumes, 200 BBL of oil and 20 BBL of produced water were recovered. Since the spill volume was greater than 25 BBL, this spill is classified as a major release in accordance with NMOCD Rules. Subsequently, the release was assigned Incident #NCH1836251271 and District RP #1RP-5295.

Immediately following the release, Cajun Energy made an emergency "One Call" dig alert and started spill remediation. All visibly impacted soil was stockpiled onto a 6ml plastic liner to prevent further spread of contamination.

Samples were taken from 10 locations at points from surface down to 2' BGS (below ground surface). Field testing for Chlorides and TPH was performed on the samples. In most locations, the sampling was conducted after the initial scraping of up to 1' of visibly obvious impacted soil – not warranting lab analyses to prove the existence of contaminants - so some sample locations start with actual samples taken from an interval of 1' to 2' BGS even though they are labeled "Surface to 2' ". When a soil sample at a location was field tested and indicated the presence of contaminant concentrations at a level below clean-up requirements, an additional soil sample was taken at the same location at a point that was one foot deeper as confirmation. Both samples were then taken to Cardinal Labs for lab analysis. All samples taken from sample locations 3 - 10 were below clean-up requirements at each point located between 1' and 2' BGS. Sample locations 1 and 2 were below clean-up requirements at their respective points located between surface and 1' BGS (Appendix II).

After the initial scaping of 1' of obviously impacted soil in the vicinity of sample locations 3 – 10, the soil was excavated another 1' for a total of 2' BGS depth excavated from those portions of the spill area. Sample locations 1 & 2 were left as is, due to field results and confirmed with lab analysis. The tanks were washed as was the interior of the secondary containment. All waste water was taken to a BTA SWD for proper disposal. All impacted soil

was taken to Sundance Services, an approved disposal facility located outside Eunice, NM. Disposal manifests are available, if needed. A total of 5,430 cubic yards of soil were excavated and sent to disposal from the spill area.

At the completion of the emergency response activity at the present site, all impacted soil containing concentrations of TPH and Chlorides above the regulatory action levels have been removed. Lab analyses of bottom and sidewall soil samples have defined the limits of the impacted area and those limits have been confirmed with lab analyses of additional soil samples at points located generally 1' deeper.

The activities described above were documented and a request to backfill the site was written in a report titled, "Site Activities & Backfill Request" dated March 4, 2019. The report was filed with the oversight agencies on March 7, 2019. After waiting on response from regulatory agencies, the site was backfilled with clean imported topsoil and caliche during nineteen days of work conducted between June 24, 2019 and August 24, 2019. Seeding is scheduled for the end of February 2020 when the site has the best chance for revegetation. The seed blend will be free of noxious weeds including love grass.

Expert Environmental, on behalf of BTA Oil Producers, respectfully request acceptance of this closure report on the release detailed herein. A site map is attached before the Appendices and pictures have been included to provide additional information about the release and the scope of the emergency response activities and backfill.

If you have any questions or concerns, please feel free to contact me.

Respectfully,

Michael Alves

Michael Anthony Alves
Expert Environmental
575-631-4310
michael@expertenviroservices.com

Appendix

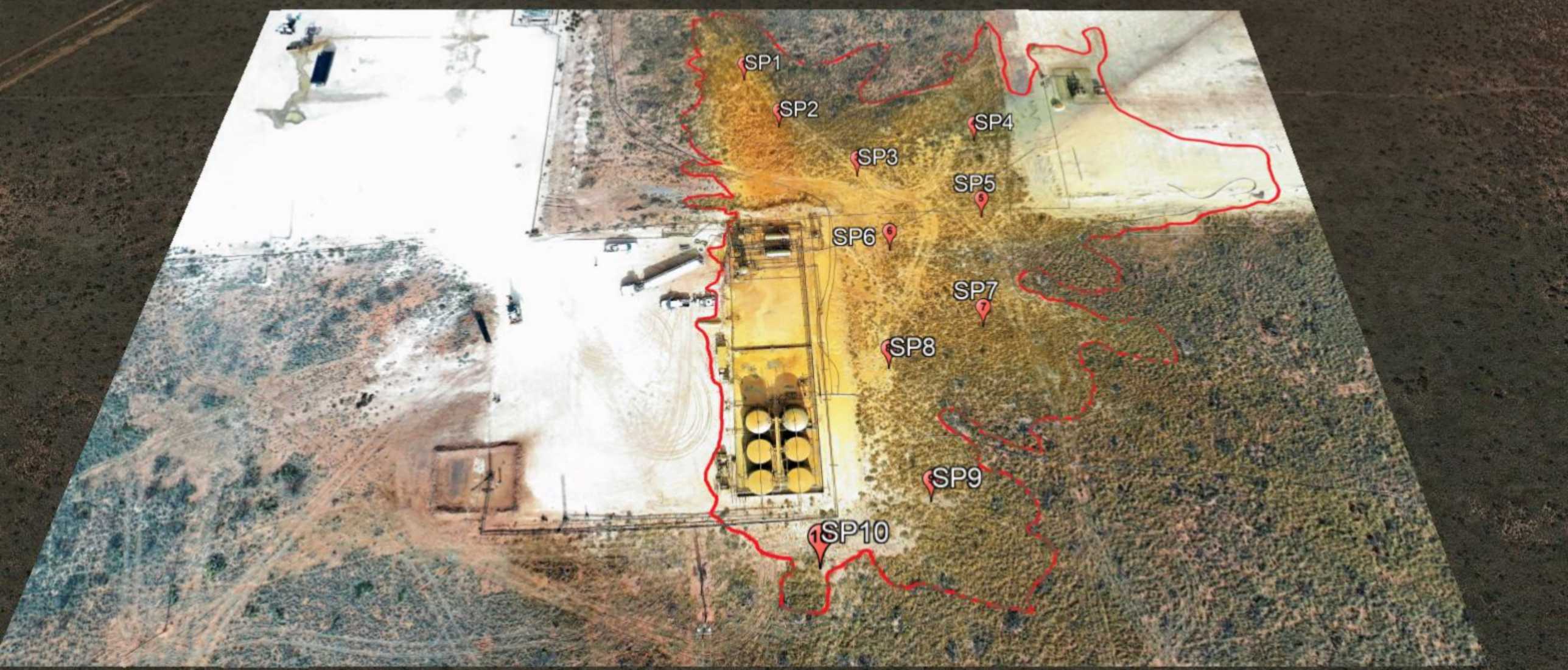
1. Site Map
2. Groundwater Study
3. Sampling and lab data
4. Site photos
5. Final C-141

Appendix I -Site Map

BTA Oil Producers

Rojo AE 7811 JV-P Federal 001H
Tank Battery
D-Sec, 27-T25S, R33E
Lea County
API 30-025-43476
659,861 Sq Ft.

Legend



Appendix II-Groundwater Study

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

No records found.

Basin/County Search:

Basin: Jal

PLSS Search:

Section(s): 27 **Township:** 25S **Range:** 33E

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.

Appendix III-sampling and labs

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

December 26, 2018

MICHAEL ALVES

BTA Oil Producers

103 South Pecos

Midland, TX 79701

RE: ROJO AE #001

Enclosed are the results of analyses for samples received by the laboratory on 12/21/18 10:07.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-18-11. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Celey D. Keene

Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

BTA Oil Producers
MICHAEL ALVES
103 South Pecos
Midland TX, 79701
Fax To: (432) 683-0312

Received:	12/21/2018	Sampling Date:	12/16/2018
Reported:	12/26/2018	Sampling Type:	Soil
Project Name:	ROJO AE #001	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: SP 3 @ 3' (H803756-01)

BTEX 8021B mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/21/2018	ND	1.81	90.5	2.00	4.56	
Toluene*	<0.050	0.050	12/21/2018	ND	1.80	90.0	2.00	3.92	
Ethylbenzene*	<0.050	0.050	12/21/2018	ND	1.78	88.8	2.00	4.27	
Total Xylenes*	<0.150	0.150	12/21/2018	ND	5.23	87.2	6.00	3.64	
Total BTEX	<0.300	0.300	12/21/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID *102 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**48.0**	16.0	12/21/2018	ND	416	104	400	3.77	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	12/21/2018	ND	199	99.4	200	1.11	
DRO >C10-C28*	<10.0	10.0	12/21/2018	ND	221	111	200	2.44	
EXT DRO >C28-C36	<10.0	10.0	12/21/2018	ND					

Surrogate: 1-Chlorooctane *108 %* *41-142*

Surrogate: 1-Chlorooctadecane *110 %* *37.6-147*

Cardinal Laboratories *=Accredited Analyte

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Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

BTA Oil Producers
MICHAEL ALVES
103 South Pecos
Midland TX, 79701
Fax To: (432) 683-0312

Received:	12/21/2018	Sampling Date:	12/16/2018
Reported:	12/26/2018	Sampling Type:	Soil
Project Name:	ROJO AE #001	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: SP 4 @ 3' (H803756-02)

BTEX 8021B mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/21/2018	ND	1.81	90.5	2.00	4.56	
Toluene*	<0.050	0.050	12/21/2018	ND	1.80	90.0	2.00	3.92	
Ethylbenzene*	<0.050	0.050	12/21/2018	ND	1.78	88.8	2.00	4.27	
Total Xylenes*	<0.150	0.150	12/21/2018	ND	5.23	87.2	6.00	3.64	
Total BTEX	<0.300	0.300	12/21/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID *105 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**16.0**	16.0	12/21/2018	ND	416	104	400	3.77	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	12/21/2018	ND	199	99.4	200	1.11	
DRO >C10-C28*	<10.0	10.0	12/21/2018	ND	221	111	200	2.44	
EXT DRO >C28-C36	<10.0	10.0	12/21/2018	ND					

Surrogate: 1-Chlorooctane *106 %* *41-142*

Surrogate: 1-Chlorooctadecane *109 %* *37.6-147*

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Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

BTA Oil Producers
MICHAEL ALVES
103 South Pecos
Midland TX, 79701
Fax To: (432) 683-0312

Received:	12/21/2018	Sampling Date:	12/16/2018
Reported:	12/26/2018	Sampling Type:	Soil
Project Name:	ROJO AE #001	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: SP 5 @ 3' (H803756-03)

BTEX 8021B mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/21/2018	ND	1.81	90.5	2.00	4.56	
Toluene*	<0.050	0.050	12/21/2018	ND	1.80	90.0	2.00	3.92	
Ethylbenzene*	<0.050	0.050	12/21/2018	ND	1.78	88.8	2.00	4.27	
Total Xylenes*	<0.150	0.150	12/21/2018	ND	5.23	87.2	6.00	3.64	
Total BTEX	<0.300	0.300	12/21/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID *96.2 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**32.0**	16.0	12/21/2018	ND	416	104	400	3.77	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	12/21/2018	ND	199	99.4	200	1.11	
DRO >C10-C28*	<10.0	10.0	12/21/2018	ND	221	111	200	2.44	
EXT DRO >C28-C36	<10.0	10.0	12/21/2018	ND					

Surrogate: 1-Chlorooctane *108 %* *41-142*

Surrogate: 1-Chlorooctadecane *109 %* *37.6-147*

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Analytical Results For:

BTA Oil Producers
MICHAEL ALVES
103 South Pecos
Midland TX, 79701
Fax To: (432) 683-0312

Received:	12/21/2018	Sampling Date:	12/16/2018
Reported:	12/26/2018	Sampling Type:	Soil
Project Name:	ROJO AE #001	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: SP 6 @ 3' (H803756-04)

BTEX 8021B mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/21/2018	ND	1.81	90.5	2.00	4.56	
Toluene*	<0.050	0.050	12/21/2018	ND	1.80	90.0	2.00	3.92	
Ethylbenzene*	<0.050	0.050	12/21/2018	ND	1.78	88.8	2.00	4.27	
Total Xylenes*	<0.150	0.150	12/21/2018	ND	5.23	87.2	6.00	3.64	
Total BTEX	<0.300	0.300	12/21/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID *97.3 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**32.0**	16.0	12/21/2018	ND	416	104	400	3.77	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	12/21/2018	ND	199	99.4	200	1.11	
DRO >C10-C28*	<10.0	10.0	12/21/2018	ND	221	111	200	2.44	
EXT DRO >C28-C36	<10.0	10.0	12/21/2018	ND					

Surrogate: 1-Chlorooctane *104 %* *41-142*

Surrogate: 1-Chlorooctadecane *103 %* *37.6-147*

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Celey D. Keene, Lab Director/Quality Manager

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Analytical Results For:

BTA Oil Producers
MICHAEL ALVES
103 South Pecos
Midland TX, 79701
Fax To: (432) 683-0312

Received:	12/21/2018	Sampling Date:	12/16/2018
Reported:	12/26/2018	Sampling Type:	Soil
Project Name:	ROJO AE #001	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: SP 7 @ 3' (H803756-05)

BTEX 8021B mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/21/2018	ND	1.81	90.5	2.00	4.56	
Toluene*	<0.050	0.050	12/21/2018	ND	1.80	90.0	2.00	3.92	
Ethylbenzene*	<0.050	0.050	12/21/2018	ND	1.78	88.8	2.00	4.27	
Total Xylenes*	<0.150	0.150	12/21/2018	ND	5.23	87.2	6.00	3.64	
Total BTEX	<0.300	0.300	12/21/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID *95.0 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**320**	16.0	12/21/2018	ND	416	104	400	3.77	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	12/21/2018	ND	199	99.4	200	1.11	
DRO >C10-C28*	<10.0	10.0	12/21/2018	ND	221	111	200	2.44	
EXT DRO >C28-C36	<10.0	10.0	12/21/2018	ND					

Surrogate: 1-Chlorooctane *97.3 %* *41-142*

Surrogate: 1-Chlorooctadecane *96.8 %* *37.6-147*

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Celey D. Keene, Lab Director/Quality Manager

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Analytical Results For:

BTA Oil Producers
MICHAEL ALVES
103 South Pecos
Midland TX, 79701
Fax To: (432) 683-0312

Received:	12/21/2018	Sampling Date:	12/16/2018
Reported:	12/26/2018	Sampling Type:	Soil
Project Name:	ROJO AE #001	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: SP 8 @ 3' (H803756-06)

BTEX 8021B mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/21/2018	ND	1.81	90.5	2.00	4.56	
Toluene*	<0.050	0.050	12/21/2018	ND	1.80	90.0	2.00	3.92	
Ethylbenzene*	<0.050	0.050	12/21/2018	ND	1.78	88.8	2.00	4.27	
Total Xylenes*	<0.150	0.150	12/21/2018	ND	5.23	87.2	6.00	3.64	
Total BTEX	<0.300	0.300	12/21/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID *97.8 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	12/21/2018	ND	416	104	400	3.77	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	12/21/2018	ND	199	99.4	200	1.11	
DRO >C10-C28*	<10.0	10.0	12/21/2018	ND	221	111	200	2.44	
EXT DRO >C28-C36	<10.0	10.0	12/21/2018	ND					

Surrogate: 1-Chlorooctane *98.1 %* *41-142*

Surrogate: 1-Chlorooctadecane *95.8 %* *37.6-147*

Cardinal Laboratories *=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

BTA Oil Producers
MICHAEL ALVES
103 South Pecos
Midland TX, 79701
Fax To: (432) 683-0312

Received:	12/21/2018	Sampling Date:	12/16/2018
Reported:	12/26/2018	Sampling Type:	Soil
Project Name:	ROJO AE #001	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: SP 9 @ 3' (H803756-07)

BTEX 8021B mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/21/2018	ND	1.81	90.5	2.00	4.56	
Toluene*	<0.050	0.050	12/21/2018	ND	1.80	90.0	2.00	3.92	
Ethylbenzene*	<0.050	0.050	12/21/2018	ND	1.78	88.8	2.00	4.27	
Total Xylenes*	<0.150	0.150	12/21/2018	ND	5.23	87.2	6.00	3.64	
Total BTEX	<0.300	0.300	12/21/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID *98.2 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**32.0**	16.0	12/21/2018	ND	416	104	400	3.92	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	12/21/2018	ND	199	99.4	200	1.11	
DRO >C10-C28*	<10.0	10.0	12/21/2018	ND	221	111	200	2.44	
EXT DRO >C28-C36	<10.0	10.0	12/21/2018	ND					

Surrogate: 1-Chlorooctane *92.6 %* *41-142*

Surrogate: 1-Chlorooctadecane *91.6 %* *37.6-147*

Cardinal Laboratories *=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

BTA Oil Producers
MICHAEL ALVES
103 South Pecos
Midland TX, 79701
Fax To: (432) 683-0312

Received:	12/21/2018	Sampling Date:	12/16/2018
Reported:	12/26/2018	Sampling Type:	Soil
Project Name:	ROJO AE #001	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: SP 10 @ 3' (H803756-08)

BTEX 8021B mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/21/2018	ND	1.81	90.5	2.00	4.56	
Toluene*	<0.050	0.050	12/21/2018	ND	1.80	90.0	2.00	3.92	
Ethylbenzene*	<0.050	0.050	12/21/2018	ND	1.78	88.8	2.00	4.27	
Total Xylenes*	<0.150	0.150	12/21/2018	ND	5.23	87.2	6.00	3.64	
Total BTEX	<0.300	0.300	12/21/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID *98.8 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**32.0**	16.0	12/21/2018	ND	416	104	400	3.92	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	12/21/2018	ND	199	99.4	200	1.11	
DRO >C10-C28*	<10.0	10.0	12/21/2018	ND	221	111	200	2.44	
EXT DRO >C28-C36	<10.0	10.0	12/21/2018	ND					

Surrogate: 1-Chlorooctane *98.2 %* *41-142*

Surrogate: 1-Chlorooctadecane *96.3 %* *37.6-147*

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Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C
	Samples reported on an as received basis (wet) unless otherwise noted on report

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Page 19 of 37

CARDINAL Laboratories

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

Company Name:	BTA Oil Producers
Project Manager:	Michael Alves
Address:	
City:	State: Zip:
Phone #:	Fax #:
Project #:	Project Owner:
Project Name:	
Project Location:	ROJO AF .001
Sampler Name:	Michael Alves

BILL TO

P.O. #:	
Company:	BTA
Attn:	Bryan Davis
Address:	
City:	
State:	Zip:
Phone #:	
Fax #:	

ANALYSIS REQUEST

FOR LAB USE ONLY Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX: GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	PRESERV.: ACID/BASE	ICE / COOL	OTHER :	SAMPLING: DATE	TIME	CL	TPH	BTEX
H803756																	
1	SP. 3 @ 3'	G				X					X		12/16	10:25	X	X	X
2	SP. 4 @ 3'	C				X					X		12/16	10:39	X	X	X
3	SP. 5 @ 3'	G				X					X		12/16	10:49	X	X	X
4	SP. 6 @ 3'	G				X					X		12/16	11:10	X	X	X
5	SP. 7 @ 3'	G				X					X		12/16	11:28	X	X	X
6	SP. 8 @ 3'	G				X					X		12/16	11:38	X	X	X
7	SP. 9 @ 3'	G				X					X		12/16	11:48	X	X	X
8	SP. 10 @ 3'	G				X					X		12/16	12:00	X	X	X

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Relinquished By:	Date: 12-21-2020	Received By: Jodi Henson	
Relinquished By:	Time: 10:07	Received By:	
	Date:		
	Time:		

Delivered By: (Circle One)
Sampler - UPS - Bus - Other: 2.1c/#97

Sample Condition: Cool ☑ Yes ☐ No; Intact ☑ Yes ☐ No

CHECKED BY: (Initials)

Phone Result: ☐ Yes ☐ No Add'l Phone #:
Fax Result: ☐ Yes ☐ No Add'l Fax #:
REMARKS:

Mike@cajun-energy.com

RUSH!!

† Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326

Received by OCD: 1/28/2020 4:21:58 PM

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

January 22, 2019

BOB HALL

BTA Oil Producers

103 South Pecos

Midland, TX 79701

RE: ROJO AE #001

Enclosed are the results of analyses for samples received by the laboratory on 01/17/19 13:40.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-18-11. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Celey D. Keene

Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

BTA Oil Producers
BOB HALL
103 South Pecos
Midland TX, 79701
Fax To: (432) 683-0312

Received:	01/17/2019	Sampling Date:	01/17/2019
Reported:	01/22/2019	Sampling Type:	Soil
Project Name:	ROJO AE #001	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: SP 1 @ 2' (H900165-01)

BTEX 8021B mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	01/21/2019	ND	2.15	108	2.00	2.09	
Toluene*	<0.050	0.050	01/21/2019	ND	2.24	112	2.00	3.71	
Ethylbenzene*	<0.050	0.050	01/21/2019	ND	2.29	115	2.00	9.35	
Total Xylenes*	<0.150	0.150	01/21/2019	ND	6.64	111	6.00	6.56	
Total BTEX	<0.300	0.300	01/21/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID *97.7 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**64.0**	16.0	01/21/2019	ND	432	108	400	3.77	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	01/18/2019	ND	240	120	200	0.290	
DRO >C10-C28*	<10.0	10.0	01/18/2019	ND	231	116	200	0.112	
EXT DRO >C28-C36	<10.0	10.0	01/18/2019	ND					

Surrogate: 1-Chlorooctane *92.8 %* *41-142*

Surrogate: 1-Chlorooctadecane *92.9 %* *37.6-147*

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Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

BTA Oil Producers
BOB HALL
103 South Pecos
Midland TX, 79701
Fax To: (432) 683-0312

Received:	01/17/2019	Sampling Date:	01/17/2019
Reported:	01/22/2019	Sampling Type:	Soil
Project Name:	ROJO AE #001	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: SP 2 @ 2' (H900165-02)

BTEX 8021B mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	01/21/2019	ND	2.15	108	2.00	2.09	
Toluene*	<0.050	0.050	01/21/2019	ND	2.24	112	2.00	3.71	
Ethylbenzene*	<0.050	0.050	01/21/2019	ND	2.29	115	2.00	9.35	
Total Xylenes*	<0.150	0.150	01/21/2019	ND	6.64	111	6.00	6.56	
Total BTEX	<0.300	0.300	01/21/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID *104 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**48.0**	16.0	01/21/2019	ND	432	108	400	3.77	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	01/18/2019	ND	240	120	200	0.290	
DRO >C10-C28*	<10.0	10.0	01/18/2019	ND	231	116	200	0.112	
EXT DRO >C28-C36	<10.0	10.0	01/18/2019	ND					

Surrogate: 1-Chlorooctane *94.4 %* *41-142*

Surrogate: 1-Chlorooctadecane *92.9 %* *37.6-147*

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Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Notes and Definitions

QR-02	The RPD result exceeded the QC control limits; however, both percent recoveries were acceptable. Sample results for the QC batch were accepted based on percent recoveries and completeness of QC data.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C
	Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories *=Accredited Analyte

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Page 24 of 37

CARDINAL Laboratories

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

Company Name:	BTA oil Producers	**BILL TO**	
Project Manager:	Bob Hall	P.O. #:	
Address:		Company:	BTA
City:	State: Zip:	Attn:	Bob Hall
Phone #:	Fax #:	Address:	
Project #:	Project Owner:	City:	
Project Name:		State: Zip:	
Project Location:	ROJO AE #001	Phone #:	
Sampler Name:	Michael Akes	Fax #:	

FOR LAB USE ONLY				MATRIX						PRESERV.			SAMPLING		ANALYSIS REQUEST		
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :	DATE	TIME	CL	TPH	BTEX
H900165																	
1	SP1@2'	G	1			X					X		1/17/19	10:00	X	X	X
2	SP2@2'	G	1			X					X		1/17/19	10:15	X	X	X

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Relinquished By:	Date: 1/17/19	Received By:	Phone Result: ☐ Yes ☐ No Add'l Phone #:
	Time: 1:40pm		Fax Result: ☐ Yes ☐ No Add'l Fax #:
Relinquished By:	Date:	Received By:	REMARKS:
	Time:		Mike@cajon-energy.com
Delivered By: (Circle One)		Sample Condition	CHECKED BY:
Sampler - UPS - Bus - Other:	-11.7°c/#97	Cool: ☑ Yes ☐ No Intact: ☑ Yes ☐ No	(Initials)

† Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326

Received by OCD: 1/28/2020 4:21:58 PM

Appendix IV-site photos

Ariel Image of entire spill

Northwest

Southwest

West

North

East

Excavating 2’BGS

Excavating around lines

Excavating 2’BGS

Continuing to excavate around lines

Site excavated

Hydro-vac around gas lines at battery

BTA OIL PRODUCERS 01/27/2020

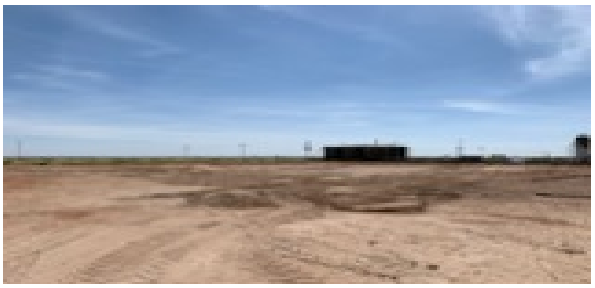
Backfilling location

Backfilling location

Hauling in topsoil

Hauling in topsoil

Continuing to backfill



Site backfilled

Site backfilled

Site backfilled

Site backfilled

Site backfilled

Site backfilled

Site backfilled

Site backfilled

Site backfilled

Site backfilled

Site backfilled

Appendix V-final 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	NCH1836251271
District RP	1RP-5295
Facility ID	
Application ID	pCH1836251636

Release Notification

Responsible Party

Responsible Party	BTA Oil Producers	OGRID	260297
Contact Name	Ben Grimes	Contact Telephone	(432) 682-3753
Contact email	bgrimes@btaoil.com	Incident #	NCH1836251271 ROJO AE 7811 JV-P FED 001H @ 30-025-43476
Contact mailing address	104 S. Pecos St., Midland, TX 79701		

Location of Release Source

Latitude 32.107610 Longitude -103.56410
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Rojo AE 7811 JV-P Fed 001H (closest well)	Site Type	Tank Battery
Date Release Discovered	12/02/2018	API# *(if applicable)*	30-025-43476

Unit Letter	Section	Township	Range	County
D	27	25S	33E	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)

☑ Crude Oil	Volume Released (bbls) 350 BBL	Volume Recovered (bbls) 200 BBL
☑ Produced Water	Volume Released (bbls) 35 BBL	Volume Recovered (bbls) 20 BBL
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	☐ Yes ☑ No
☐ Condensate	Volume Released (bbls)	Volume Recovered (bbls)
☐ Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
☐ Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

A dump valve froze into a closed position on the separator, causing the vessel to pressure up and the high pressure relief valve (pop-off) to open to prevent rupture of the vessel and the incoming lines.

Form C-141
Page 2

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? ☑ Yes ☐ 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)?

Email sent to Shelly Tucker, BLM, and Christina Hernandez, NMOCD, by Michael Alves, Cajun Energy, on 12/2/2018 at 9:02 PM.

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:

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: Ben Grimes Title: Production Manager

Signature: Ben Grimes Date: 12/4/18

email: bgrimes@btaoil.com Telephone: (432) 682-3753

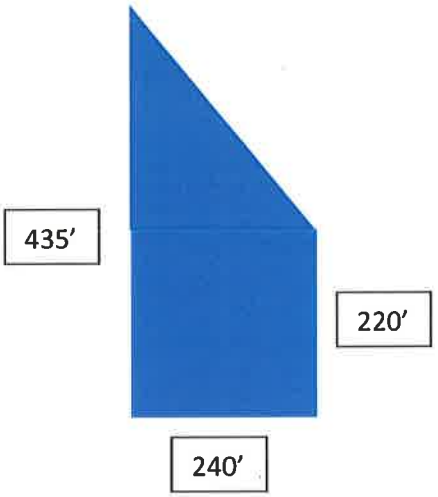
OCD Only

Received by: Date:

Release Notification for 12/2/2018 Incident

Calculations for Rojo AE 7811 JV-P Federal 001H (nearest well)

- **The impacted area outside of the tank battery containment was calculated as follows:**



Measured Soil Porosity: 3%

Length x Width x Depth x Soil Porosity

220' x 240' x 4/12' x .03 / 5.615 ft3/BBL +

½ x 215' x 240' x 4/12' x .03 / 5.615 ft3/BBL

= 94 + 46 BBL

= 140 BBL

- **Plus: 220 BBL was contained and recovered from the tank battery secondary containment area.**
- **Plus: Estimated 25 BBL fluid remains inside secondary containment spread across the top of the tanks, vessels and piping.**

Total volume reported: 385 BBL

At 10% Water Cut, Volumes in this Release Notification estimate are:

Crude Oil: 350 BBL

Produced Water: 35 BBL

State of New Mexico
Oil Conservation Division

Incident ID	NCH1836251271
District RP	1RP-5295
Facility ID	
Application ID	pCH1836251636

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?	**>100** (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ☒ 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)?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☒ 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?	☐ Yes ☒ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☒ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☒ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☒ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☒ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☒ No
Did the release impact areas **not** on an exploration, development, production, or storage site?	☒ Yes ☐ 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.

Form C-141
Page 4

State of New Mexico
Oil Conservation Division

Incident ID	NCH1836251271
District RP	1RP-5295
Facility ID	
Application ID	pCH1836251636

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: **1/28/2020**

email: **bhall@btaoil.com**

Telephone: **432-682-3753**

OCD Only

Received by: Cristina Eads

Date: 03/16/2020

Form C-141
Page 5

State of New Mexico
Oil Conservation Division

Incident ID	NCH1836251271
District RP	1RP-5295
Facility ID	
Application ID	pCH1836251636

Remediation Plan

Remediation Plan Checklist: ***Each of the following items must be included in the plan.***

- ☒ Detailed description of proposed remediation technique
- ☒ Scaled sitemap with GPS coordinates showing delineation points
- ☒ Estimated volume of material to be remediated
- ☒ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☒ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: ***Each of the following items must be confirmed as part of any request for deferral of remediation.***

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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: BHall Date: **1/28/2020**

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

OCD Only

Received by: _____ Date: _____

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: _____ Date: _____

Form C-141
Page 6

State of New Mexico
Oil Conservation Division

Incident ID	NCH1836251271
District RP	1RP-5295
Facility ID	
Application ID	pCH1836251636

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: Bob Hall Date: **1/28/2020**

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

OCD Only

Received by: Cristina Eads Date: 03/16/2020

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: Denied Date: 03/16/2020

Printed Name: Cristina Eads Title: Environmental Specialist