

# ***ENVIRONMENTAL PLUS, INC.***

2100 AVE. 'O'  
P.O. BOX 1558  
EUNICE, NM 88231  
[ddominguezepi@gmail.com](mailto:ddominguezepi@gmail.com)  
Office: (575)394-3481 Fax: (575)394-2601



## **CLOSURE REPORT**

**BOPCO, L.P.**  
**PLU #423H Lact Unit**  
**Eddy County, New Mexico**  
**Unit Letter "I", Section 19, Township 25 South, Range 30 East**  
**Latitude 32.113042 North, Longitude 103.914955 West**  
**NMOCD Reference #2RP-3049**

Prepared For:

**BOPCO, L.P.**  
522 W. Mermod, Suite 704  
Carlsbad, New Mexico 88220

Prepared By:

Environmental Plus Inc.  
2100 Ave. 'O'  
Eunice, NM 88231

**October 2015**

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Daniel Dominguez  
Project Manager



29 October 2015

Mr. Mike Bratcher  
Environmental Specialist  
NMOCD  
811 S. First St.  
Artesia, New Mexico 88210

RE: Final Closure Report  
Bopco – PLU #423H Lact Unit  
UL-I, Section 19, Township 25 South, Range 30 East  
Eddy County, New Mexico  
NMOCD Reference # 2RP 3049

Mr. Bratcher:

The following *Final Closure Report* serves as a condensed update on closure activities for the above referenced Site.

**Background Information:**

Air eliminator on battery LACT unit failed and oil was released. Standing fluids were recovered and the air eliminator was repaired. The leak affected approximately 480 square feet of well pad.

**Remediation Activities:**

EPI personnel mobilized on the site on July 14, 2015 to collect soil samples via hand auger to determine the vertical extent of contamination. A total of seven (7) soil samples were collected from three (3) sample locations, SP1 – SP3. Three (3) representative samples were sent to Cardinal Labs in Hobbs, New Mexico, for testing.

Laboratory analytical results indicate the release area to be void of Benzene, BTEX, TPH and Chloride concentrations in excess of NMOCD Recommended Remedial Action Levels (RRALs) of 10 mg/Kg, 50 mg/Kg, 5,000 mg/Kg, and 1,000 mg/Kg, respectively (reference *Figure 3* and *Table 2*).

On September 21, 2015 the release area around SP1 was excavated to a depth of one (1) foot bgs; the remainder of the release area was surface scraped, with approximately 5 cubic yards of contaminated material excavated and transported to a state approved disposal facility.

**Closure Activities:**

On September 21, 2015 the excavation was backfilled with approximately 5 cubic yards of clean soil and contoured to blend with existing pad area to protect against wind/water erosion.



Should you have any questions or concerns please feel free to contact me at (575) 394-3481 or via e-mail at [ddominguezepi@gmail.com](mailto:ddominguezepi@gmail.com) or Mr. Brad Blevins at (432) 214-3704 or via e-mail at [bblevins@basspet.com](mailto:bblevins@basspet.com). All official communication should be addressed to:

Mr. Brad Blevins  
Bopco, L.P.  
522 W. Mermond, Suite 704  
Carlsbad, NM 88220

Sincerely,

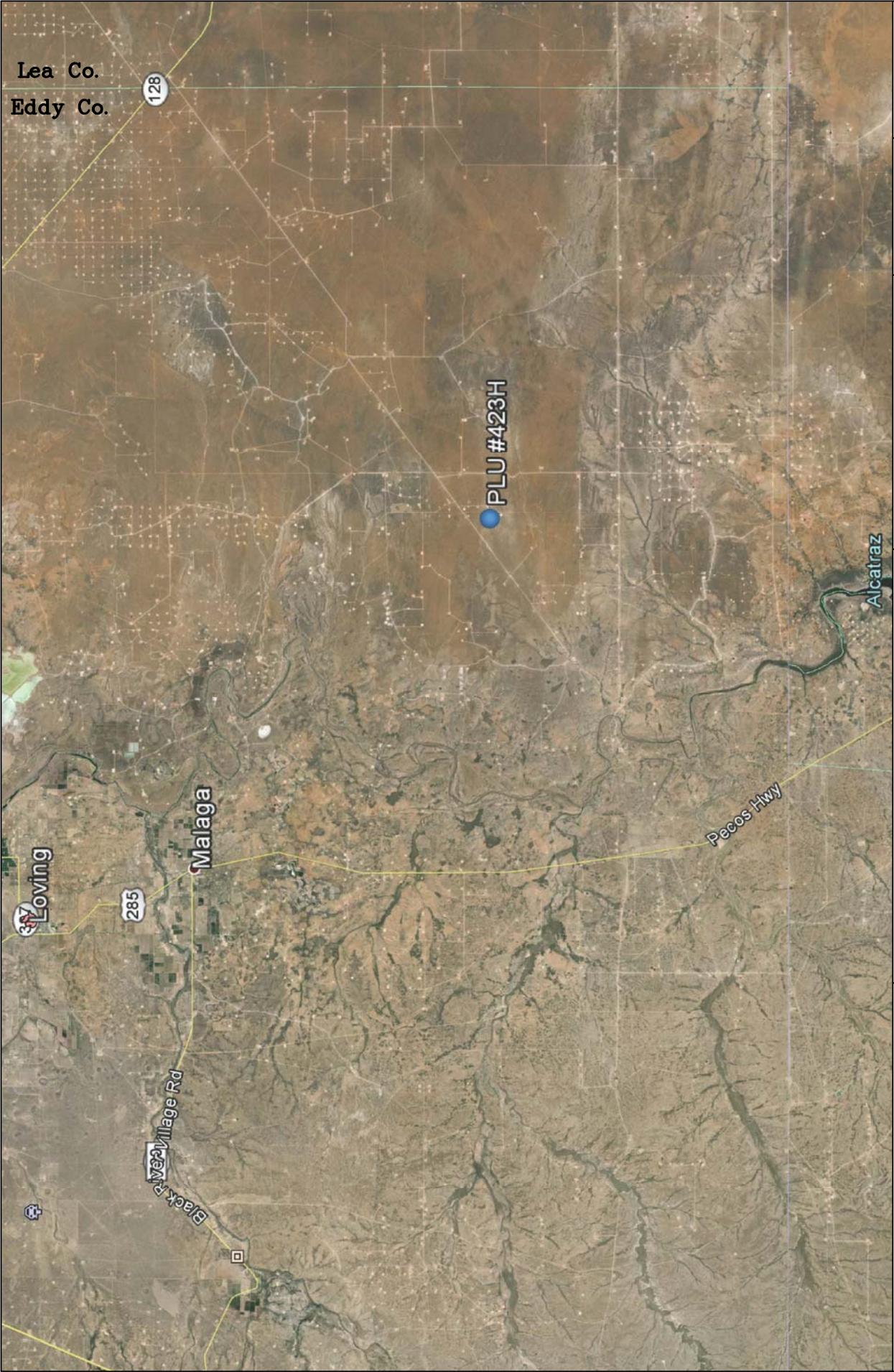
ENVIRONMENTAL PLUS, INC.

Daniel Dominguez  
Environmental Consultant

cc: Brad Blevins, EHS Asst. Remediation Foreman – Bopco, L.P.  
Tony Savoie, Remediation Foreman – Bopco, L.P. 1(432)556-8730  
File

Encl.: Figure 1 – Area Map  
Figure 2 – Site Location Map  
Figure 3 – Site/Sample Map  
Table 2 – Summary of Soil Sample Field Testing and Laboratory Analytical Results  
Attachment I – Photographs  
Attachment II – Laboratory Analytical Results  
Attachment III – Copy of Initial NMOCD Form C-141, Final C-141

## **FIGURES**



Lea Co.  
Eddy Co.

128

PLU #423H

Loving

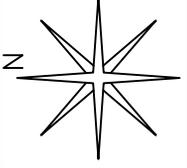
285

Black River Village Rd

Malaga

Pecos Hwy

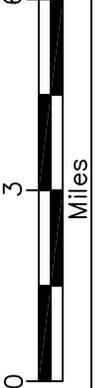
Alcatraz



REVISED:

DWG By: D Dominguez  
October 2015

6  
SHEET  
1 of 1



Eddy County, New Mexico  
NE 1/4 of SE 1/4, Sec. 19, T25S, R30E  
N 32° 6' 46.97" W 103° 54' 53.69"  
Elevation: 3,183 feet amsl

Figure 1  
Area Map  
Bopco, L.P.  
PLU #423H Lact Unit



<p>DWG By: D Dominguez October 2015</p>	<p>REVISED:</p>	
<p>0 2,000 4,000 Feet</p>	<p>4,000 SHEET 1 of 1</p>	
<p>Eddy County, New Mexico NE 1/4 of SE 1/4, Sec. 19, T25S, R30E N 32° 6' 46.97" W 103° 54' 53.69" Elevation: 3,183 feet amsl</p>		
<p>Figure 2 Site Location Map Bopco, L.P. PLU #423H Lact Unit</p>		



LEGEND

XSP1 Sample Point

REVISED:

40 SHEET 1 of 1

0 20 40 Feet

N

DWG By: D Dominguez  
October 2015

Eddy County, New Mexico  
NE 1/4 of SE 1/4, Sec. 19, T25S, R30E  
N 32° 6' 46.97" W 103° 54' 53.69"  
Elevation: 3,183 feet amsl

Figure 3  
Site/Sample Map  
Bopco, L.P.  
PLU #423H Lact Unit

## **TABLES**

**TABLE 2**  
**Summary of Soil Sample Field Testing and Laboratory Analytical Results**  
**Bopco, L. P.**  
**PLU #423H Lact Unit**

Lab Sample ID	Depth (feet)	Soil Status	Sample Date	PID Reading (ppm)	Field Chloride (mg/Kg)	Benzene (mg/Kg)	Toluene (mg/Kg)	Ethylbenzene (mg/Kg)	Total Xylenes (mg/Kg)	Total BTEX (mg/Kg)	GRO C6-C10 (mg/Kg)	DRO C10-C28 (mg/Kg)	EXT DRO C28-C35 (mg/Kg)	Total TPH (mg/Kg)	Chloride (mg/Kg)
SP1	Surface	Excavated	14-Jul-15	259	120	--	--	--	--	--	--	--	--	--	--
	1	In Situ	14-Jul-15	255	120	--	--	--	--	--	--	--	--	--	--
	2	In Situ	14-Jul-15	9.0	160	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<30.0	<16.0
SP2	Surface	Excavated	14-Jul-15	70	80	--	--	--	--	--	--	--	--	--	--
	1	In Situ	14-Jul-15	7.1	80	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<30.0	<16.0
SP3	Surface	Excavated	14-Jul-15	290	120	--	--	--	--	--	--	--	--	--	--
	1	In Situ	14-Jul-15	10.6	80	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<30.0	<16.0
NMOCD Recommended Remedial Action Levels				100		10				50				5,000	1,000

-- = Not Analyzed  
**Bold** values are in excess of NMOCD Recommended Remedial Action Levels  
*Shaded values indicates soil has been excavated*

## **ATTACHMENTS**

**ATTACHMENT I**  
**Photographs**



Photograph #1 – Lease sign



Photograph #2 – Looking across release area



Photograph #3 – Excavated area



Photograph #4 – Excavated area



Photograph #5 – Backfilled area



Photograph #6 – Backfilled area

**ATTACHMENT II**  
**Laboratory Analytical Results**



July 21, 2015

Daniel Dominguez  
Environmental Plus, Inc.  
P.O. Box 1558  
Eunice, NM 88231

RE: PLU # 423H LACT UNIT

Enclosed are the results of analyses for samples received by the laboratory on 07/15/15 15:32.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. 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](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

Cardinal Laboratories is accredited 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,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style.

Celey D. Keene  
Lab Director/Quality Manager

**Analytical Results For:**

 Environmental Plus, Inc.  
 Daniel Dominguez  
 P.O. Box 1558  
 Eunice NM, 88231  
 Fax To: (505) 394-2601

Received:	07/15/2015	Sampling Date:	07/14/2015
Reported:	07/21/2015	Sampling Type:	Soil
Project Name:	PLU # 423H LACT UNIT	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Judy Garcia
Project Location:	UL-I SEC. 19, T25S, R30E		

**Sample ID: SP1 (2') (H501815-01)**

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	07/20/2015	ND	2.04	102	2.00	2.59		
Toluene*	<0.050	0.050	07/20/2015	ND	2.06	103	2.00	4.16		
Ethylbenzene*	<0.050	0.050	07/20/2015	ND	2.25	113	2.00	3.74		
Total Xylenes*	<0.150	0.150	07/20/2015	ND	5.91	98.4	6.00	3.95		
Total BTEX	<0.300	0.300	07/20/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 114 % 85.6-137

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	07/20/2015	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	07/17/2015	ND	183	91.3	200	5.04		
DRO >C10-C28	<10.0	10.0	07/17/2015	ND	189	94.6	200	7.58		
EXT DRO >C28-C35	<10.0	10.0	07/17/2015	ND						

Surrogate: 1-Chlorooctane 80.0 % 47.2-157

Surrogate: 1-Chlorooctadecane 86.3 % 52.1-176

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Analytical Results For:**

 Environmental Plus, Inc.  
 Daniel Dominguez  
 P.O. Box 1558  
 Eunice NM, 88231  
 Fax To: (505) 394-2601

 Received: 07/15/2015  
 Reported: 07/21/2015  
 Project Name: PLU # 423H LACT UNIT  
 Project Number: NONE GIVEN  
 Project Location: UL-I SEC. 19, T25S, R30E

 Sampling Date: 07/14/2015  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Judy Garcia

**Sample ID: SP2 (1') (H501815-02)**

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	07/20/2015	ND	2.04	102	2.00	2.59		
Toluene*	<0.050	0.050	07/20/2015	ND	2.06	103	2.00	4.16		
Ethylbenzene*	<0.050	0.050	07/20/2015	ND	2.25	113	2.00	3.74		
Total Xylenes*	<0.150	0.150	07/20/2015	ND	5.91	98.4	6.00	3.95		
Total BTEX	<0.300	0.300	07/20/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 114 % 85.6-137

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	07/20/2015	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	07/17/2015	ND	183	91.3	200	5.04		
DRO >C10-C28	<10.0	10.0	07/17/2015	ND	189	94.6	200	7.58		
EXT DRO >C28-C35	<10.0	10.0	07/17/2015	ND						

Surrogate: 1-Chlorooctane 74.4 % 47.2-157

Surrogate: 1-Chlorooctadecane 61.5 % 52.1-176

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Analytical Results For:**

 Environmental Plus, Inc.  
 Daniel Dominguez  
 P.O. Box 1558  
 Eunice NM, 88231  
 Fax To: (505) 394-2601

 Received: 07/15/2015  
 Reported: 07/21/2015  
 Project Name: PLU # 423H LACT UNIT  
 Project Number: NONE GIVEN  
 Project Location: UL-I SEC. 19, T25S, R30E

 Sampling Date: 07/14/2015  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Judy Garcia

**Sample ID: SP3 (1') (H501815-03)**

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	07/20/2015	ND	2.04	102	2.00	2.59		
Toluene*	<0.050	0.050	07/20/2015	ND	2.06	103	2.00	4.16		
Ethylbenzene*	<0.050	0.050	07/20/2015	ND	2.25	113	2.00	3.74		
Total Xylenes*	<0.150	0.150	07/20/2015	ND	5.91	98.4	6.00	3.95		
Total BTEX	<0.300	0.300	07/20/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 113 % 85.6-137

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	07/20/2015	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	07/17/2015	ND	183	91.3	200	5.04		
DRO >C10-C28	<10.0	10.0	07/17/2015	ND	189	94.6	200	7.58		
EXT DRO >C28-C35	<10.0	10.0	07/17/2015	ND						

Surrogate: 1-Chlorooctane 78.9 % 47.2-157

Surrogate: 1-Chlorooctadecane 81.7 % 52.1-176

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



Celey D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

- QM-4X The spike recovery was outside of QC acceptance limits for the MS and/or MSD due to analyte concentration at 4 times or greater the spike concentration. The QC batch was accepted based on LCS and/or LCSD recoveries within the acceptance limits.
- 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





**ATTACHMENT III**  
**Copy of Initial NMOCD Form C-141**  
**Final C-141**

# NM OIL CONSERVATION

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

ARTESIA DISTRICT  
JUN 12 2015

RECEIVED

State of New Mexico  
Energy Minerals and Natural Resources

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

Form C-141  
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

## Release Notification and Corrective Action

*NAB1516732273*

### OPERATOR

Initial Report  Final Report

Name of Company: BOPCO, L.P. <i>2100737</i>	Contact: Amy Ruth
Address: 522 W. Mermod, Suite 704 Carlsbad, N.M. 88220	Telephone No. 575-887-7329
Facility Name: Poker Lake Unit 423H Tank Battery	Facility Type: Exploration and Production

Surface Owner: Federal	Mineral Owner: Federal	API No. 30-015- <del>70710</del> <i>40710</i>
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### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
I	19	25S	30E	1750	South	880	East	Eddy

Latitude 32.113042° Longitude -103.914955°

### NATURE OF RELEASE

Type of Release Crude Oil	Volume of Release 6 bbls	Volume Recovered 1 bbl
Source of Release LACT unit	Date and Hour of Occurrence 6/3/2015 Time unknown	Date and Hour of Discovery 6/3/2015 approx. 4 pm
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom? N/A	
By Whom? N/A	Date and Hour N/A	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. N/A	
If a Watercourse was Impacted, Describe Fully.* N/A		

Describe Cause of Problem and Remedial Action Taken.\*  
Air eliminator on battery LACT unit failed and oil was released. Standing fluids were recovered. Air eliminator was repaired.

Describe Area Affected and Cleanup Action Taken.\*  
Leak affected approximately 480 square feet of well pad. Impacted area will be delineated and addressed.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.

Signature: <i>[Signature]</i>	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Amy Ruth	Signed By: <i>[Signature]</i> Approved by Environmental Specialist:	
Title: Assistant Remediation Foreman	Approval Date: <i>6/10/15</i>	Expiration Date: <i>N/A</i>
E-mail Address: ACRuth@basspet.com	Conditions of Approval: <b>Remediation per O.C.D. Rules &amp; Guidelines</b> Attached <input type="checkbox"/>	
Date: 6/10/2015 Phone: 432-661-0571	<b>SUBMIT REMEDIATION PROPOSAL NO</b>	

LATER THAN: *7/17/15*

*2RP 3049*

\* Attach Additional Sheets If Necessary

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

Form C-141  
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

**Release Notification and Corrective Action**

**OPERATOR**

Initial Report  Final Report

Name of Company: BOPCO, L.P.	Contact: Bradley Blevins
Address: 522 W. Mermod, Suite 704 Carlsbad, N.M. 88220	Telephone No. 575-887-7329
Facility Name: PLU #423H Lact Unit; 2RP# 3049	Facility Type: Exploration and Production
Surface Owner: Federal	Mineral Owner: Federal
API No. 30-015-40710	

**LOCATION OF RELEASE**

Unit Letter I	Section 19	Township 25S	Range 30E	Feet from the 1750	North/South Line South	Feet from the 880	East/West Line East	County Eddy
------------------	---------------	-----------------	--------------	-----------------------	---------------------------	----------------------	------------------------	----------------

Latitude: N 32.113042° Longitude: W 103.914955°

**NATURE OF RELEASE**

Type of Release: crude oil	Volume of Release: 6 bbls	Volume Recovered: 1 bbl
Source of Release: Lact Unit	Date and Hour of Occurrence: 6/3/15 @ unknown	Date and Hour of Discovery: 6/3/15 @ 4 pm
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom? N/A	
By Whom? N/A	Date and Hour: N/A	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse: Not Applicable	
If a Watercourse was Impacted, Describe Fully.* Not Applicable		
Describe Cause of Problem and Remedial Action Taken.* Air eliminator on battery LACT unit failed and oil was released. Standing fluids were recovered. Air eliminator was repaired.		
Describe Area Affected and Cleanup Action Taken.* Leak affected approximately 480 square feet of well pad. Samples were collected and sent to Cardinal Labs to be tested. Based on analytical data and NMOCD approval the contaminated soil has been excavated and hauled to a state approved disposal facility, and the excavation backfilled with clean soil.		
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.		

**OIL CONSERVATION DIVISION**

Signature: 	Approved by Environmental Specialist:	
Printed Name: Bradley Blevins	Approval Date:	Expiration Date:
Title: Assistant Remediation Foreman	Conditions of Approval:	
E-mail Address: bblevins@basspet.com	Attached <input type="checkbox"/>	
Date: <u>11-2-15</u> Phone: 432-214-3704		

\* Attach Additional Sheets If Necessary