BURNETT OIL CO., INC.

September 20, 2019

Mike Bratcher
New Mexico Energy, Minerals & Natural Resources Oil Conservation Division,
Environmental Bureau - District 2
811 S. First St.
Artesia, NM 882L0

RE: Closure Report
Burnett Oil Co., Inc. – Water Flood Injection Station
UL/K sec. 13 T17S R30E

Mr. Bratcher

The above location is located approximately 2 miles northeast of Loco Hills, New Mexico at UL/K sec. 13 T17S R30E (API# 30-015-32441). The site is located in an area of no known groundwater.

On February 4, 2017, a release was discovered of 83 barrels of total fluid. The release occurred when a ¼" nipple on an H pump corroded and released fluid. The area impacted a 40'x75' area on the pad and a 470'x1' area on the East side of the lease road, and 720'x 5-20' area in the pasture. The BLM and the NMOCD were both notified of the release on February 4, 2017 with the initial C-141 being filed later that same day.

Corrective Action Plan

On March 2, 2017 Burnett Oil Co., Inc. sampled the impacted area, and took the samples to an accredited lab for analytical analysis. To remediate the impacted soil, Burnett Oil Co., Inc. enlisted the services of Aspen Grow LLC. to apply Probiotic compounds to the impacted area. Due to the size of the release, we broke the remediation into two stages. On June 4th the probiotics were applied to the areas of SB-1, SB-2, and SB-3 with fresh water to the impacted area once a week for twelve weeks. In that time the probiotics and the fresh water were able

BURNETT OIL CO., INC.

September 20, 2019

to begin remediating the hydrocarbons in the impacted area. The impacted area was sampled on 8/29/18. On November 5, 2018 the probiotics were applied to the areas of SB-4, SB-5, SB-6, SB-7, SB-8, SB-9, and SB-10. The analytical collected on 2/27/19 shows that the areas of SB-8 and SB-10 showed elevated chloride levels. The areas of SB-8 and SB-10 both had additional applications of the probiotics for 24 weeks. During that time, samples were collected on 5/18/19 and again on 9/13/19. The analytical shows that the release area has been remediated below regulatory standards. There is a discrepancy on the analytical that was collected on 9/13/19. The samples that were collected from SP-10, was inadvertently labeled SP-11.

At this time, Burnett Oil Co., Inc. requests the closure of this remediation. Upon approval, BOCI will submit all proper closure documentation to the NMOCD and the BLM in accordance to the State and Federal Guidelines set forth.

Please feel free to contact me with any questions concerning this remediation plan request.

Sincerely,

Johnny Titsworth
HSE Coordinator
Burnett Oil Co., Inc.
P.O. Box 188 / CR 220 North
Loco Hills, NM 88255
(432)-425-2891
Email: jtitsworth@burnettoil.com

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	2RP-4117
Facility ID	
Application ID	

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: Johnny Titsworth Title: HSE Coordinator

Signature: Date: 9/20/19

email: jtitsworth@burnettoil.com Telephone: (432) 425-2891

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:

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

X Initial Report Final Report

Name of Company: Burnett Oil Co., Inc.	Contact: Johnny Titsworth
Address: Burnett Plaza-Ste 1500, 801 Cherry St-Unit 9, Fort Worth, TX 76102	Telephone No. (432) 425-2891
Facility Name: Water Flood Injection Station	Facility Type: facility

Surface Owner: BLM	Mineral Owner: BLM	API No. 30-015-32441

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
K	13	17S	30E	1650	FSL	2310	FEL	Eddy

Latitude: 32.83169 **Longitude:** -103.92791

NATURE OF RELEASE

Type of Release: oil & pw	Volume of Release: 3/80	Volume Recovered 0/0
Source of Release: H pump	Date and Hour of Occurrence: 2/4/17 9:00 am	Date and Hour of Discovery 2/4/17 11:30 am
Was Immediate Notice Given? X Yes ☐ No ☐ Not Required	If YES, To Whom? OCD – M. Bratcher BLM – S. Tucker	
By Whom? Johnny Titsworth	Date and Hour:	
Was a Watercourse Reached? ☐ Yes X No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

N/A

Describe Cause of Problem and Remedial Action Taken.*
1/4" nipple on H pump corroded out and release fluid onto ground inside Inj. Station, running across the pad, down the lease road, and into the pasture. The impacted area will be sampled and remediated to regulatory standards

Describe Area Affected and Cleanup Action Taken.*
the release ran out the south side of the Inj. Station and traveled approx. 510' along the lease road, and then ran approx. 720' West into the pasture.

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:	OIL CONSERVATION DIVISION	
Printed Name: Johnny Titsworth	Approved by Environmental Specialist:	
Title: HSE Coordinator	Approval Date:	Expiration Date:
E-mail Address: jtitsworth@burnettoil.com	Conditions of Approval:	Attached ☐
Date: 2/10/17 Phone: (432) 425-2891		

* Attach Additional Sheets If Necessary

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

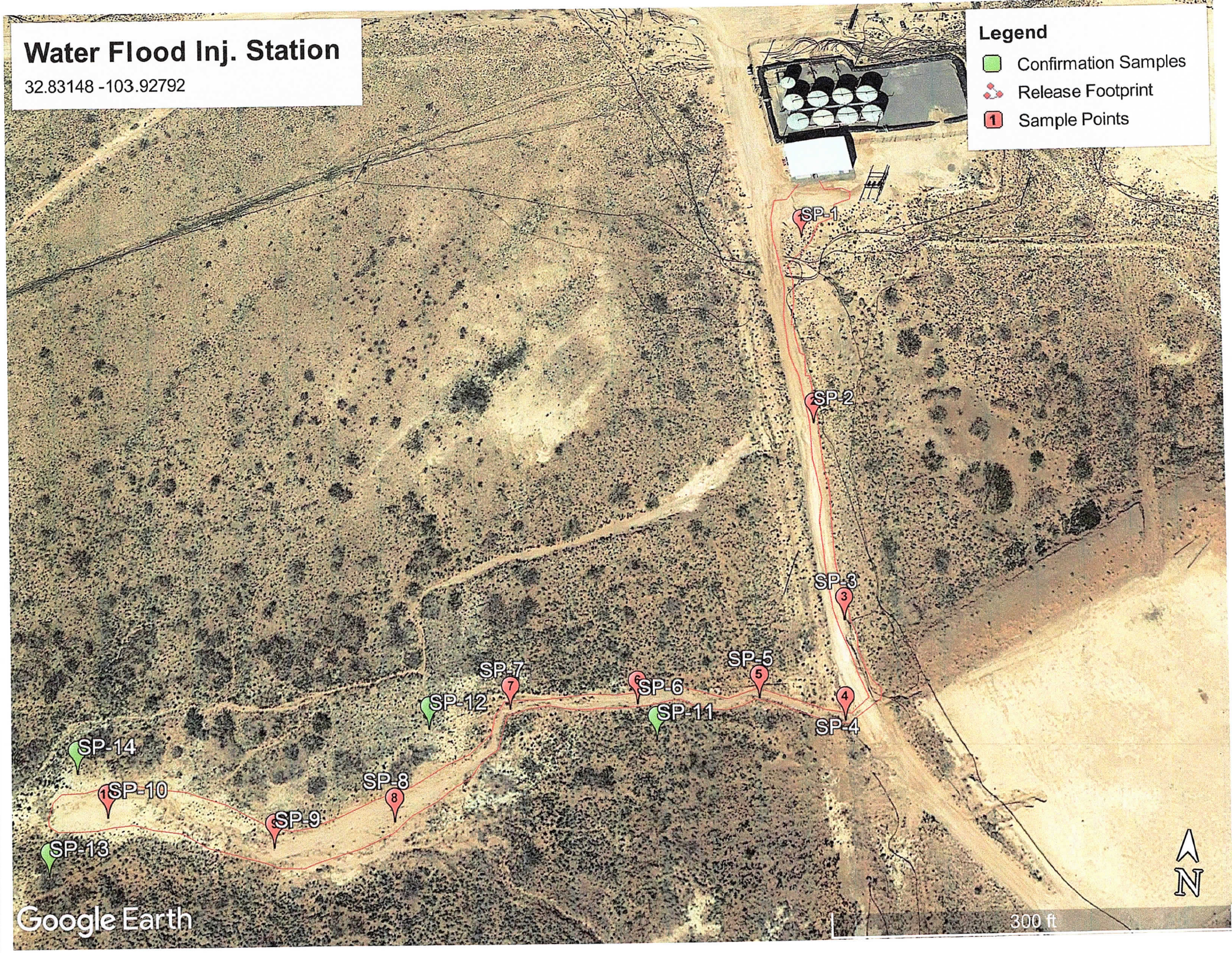
No records found.

Basin/County Search:

County: Eddy

PLSS Search:

Section(s): 13 **Township:** 17S **Range:** 30E

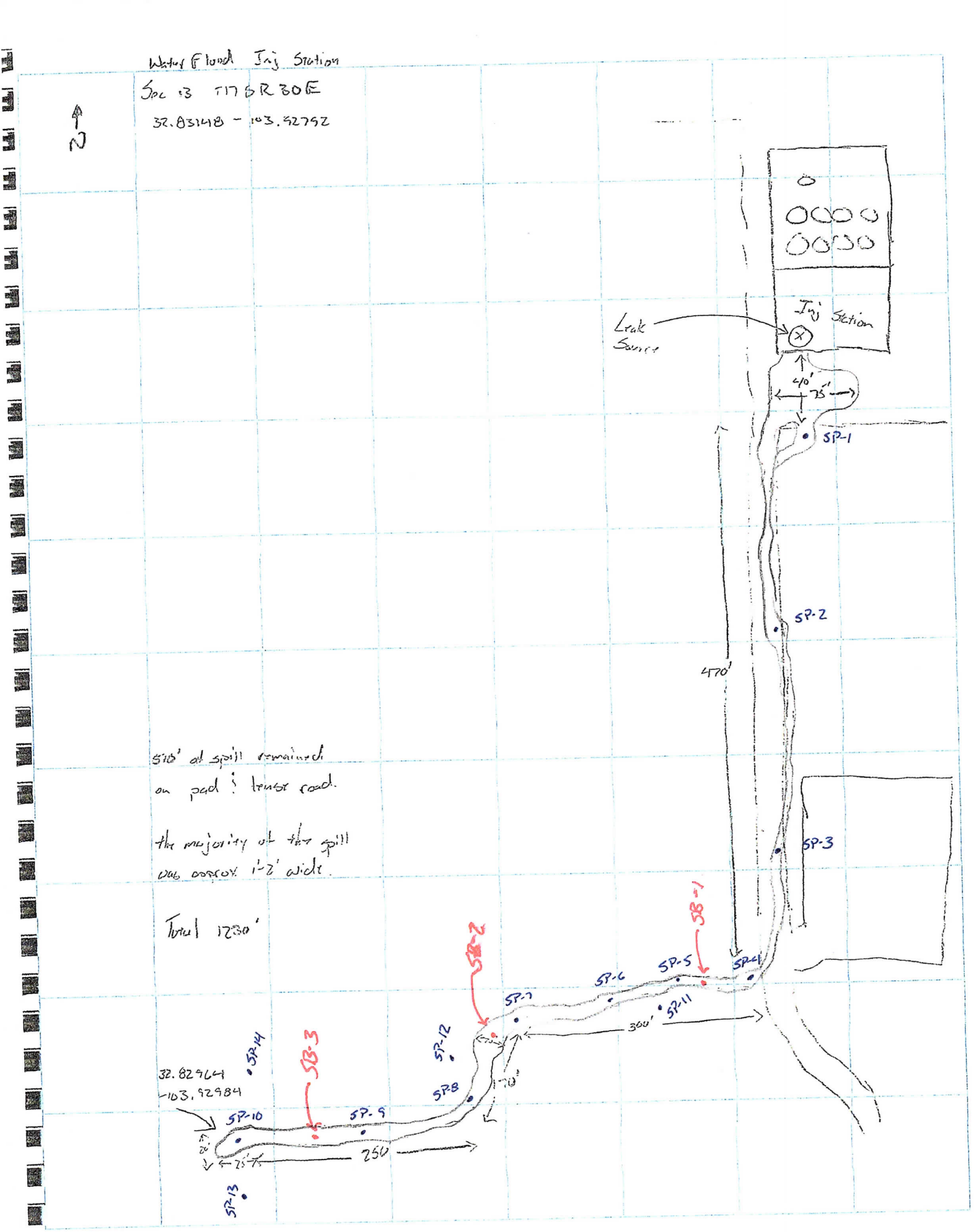

Water Flood Inj. Station
32.83148 -103.92792
Legend
Confirmation Samples
Release Footprint
Sample Points
SP-1
SP-2
SP-3
SP-4
SP-5
SP-6
SP-7
SP-8
SP-9
SP-10
SP-11
SP-12
SP-13
SP-14
Google Earth
300 ft
N

Water Flood Inj Station

Sec 13 T17S R30E

32.83148 - 103.92752

N



518' of spill remained on pad & lease road.

the majority of the spill was approx 1-2' wide.

Total 1230'

BURNETT OIL CO., INC.

Location: Water Injection Station

Table 1 - Analytical Results

Date	Sample ID	Depth	Chloride	TPH - GRO	TPH - DRO	TPH-Total	Benzene	Toluene	Ethylbenzene	Xylene	BTEX
3/2/2017	SP-1	0-1'	5450								
3/2/2017	SP-1	1'-2'	2530								
3/2/2017	SP-1	2'-3'	330								
3/2/2017	SP-1	3'-4'	233								
3/2/2017	SP-1	4'-5'	218								
3/2/2017	SP-2	0'--1'	11200								
3/2/2017	SP-2	1'-2'	1330								
3/2/2017	SP-2	2'-3'	378								
3/2/2017	SP-3	0-1'	6030								
3/2/2017	SP-3	1'-2'	23100								
3/2/2017	SP-3	2'-3'	15200								
3/2/2017	SP-3	3'-4'	5060								

BURNETT OIL CO., INC.

Location: Water Injection Station

Table 1 - Analytical Results

Date	Sample ID	Depth	Chloride	TPH - GRO	TPH - DRO	TPH-Total	Benzene	Toluene	Ethylbenzene	Xylene	BTEX
3/2/2017	SP-3	4'-5'	3420								
3/2/2017	SP-4	0-1'	2110								
3/2/2017	SP-4	1'-2'	745								
3/2/2017	SP-4	2'-3'	4390								
3/2/2017	SP-4	3'-4'	1690								
3/2/2017	SP-4	4'-5'	1770								
3/2/2017	SP-5	0-1'	5400								
3/2/2017	SP-5	1'-2'	4670								
3/2/2017	SP-5	2'-3'	2480								
3/2/2017	SP-5	3'-4'	441								
3/2/2017	SP-5	4'-5'	1800								
3/2/2017	SP-6	0-1'	5160								

BURNETT OIL CO., INC.

Location: Water Injection Station

Table 1 - Analytical Results

Date	Sample ID	Depth	Chloride	TPH - GRO	TPH - DRO	TPH-Total	Benzene	Toluene	Ethylbenzene	Xylene	BTEX
3/2/2017	SP-6	1'-2'	7550								
3/2/2017	SP-6	2'-3'	8230								
3/2/2017	SP-6	3'-4'	7760								
3/2/2017	SP-6	4'-5'	8660								
3/2/2017	SP-7	0-1'	4650	33	227	260	ND	ND	ND	ND	ND
3/2/2017	SP-7	1'-2'	4350								
3/2/2017	SP-7	2'-3'	1030								
3/2/2017	SP-7	3'-4'	762								
3/2/2017	SP-7	4'-5'	653								
3/2/2017	SP-8	0-1'	11200	35	ND	35	ND	ND	ND	ND	ND
3/2/2017	SP-8	1'-2'	6560								
3/2/2017	SP-8	2'-3'	8600								

BURNETT OIL CO., INC.

Location: Water Injection Station

Table 1 - Analytical Results

Date	Sample ID	Depth	Chloride	TPH - GRO	TPH - DRO	TPH-Total	Benzene	Toluene	Ethylbenzene	Xylene	BTEX
3/2/2017	SP-8	3'-4'	9110								
3/2/2017	SP-8	4'-5'	6640								
3/2/2017	SP-9	0-1'	13000	ND	28	ND	ND	ND	ND	ND	ND
3/2/2017	SP-10	1'-2'	3750								
3/2/2017	SP-10	2'-3'	6530								
3/2/2017	SP-10	3'-4'	4410								
3/2/2017	SP-10	4'-5'	2850								
3/2/2017	SP-10	0-1'	22200	34	ND	34	0.00258	0.00246	ND	0.00307	0.00811
3/2/2017	SP-10	1'-2'	3570								
3/2/2017	SP-10	2'-3'	4950								
3/2/2017	SP-10	3'-4'	6130								
3/2/2017	SP-10	4'-5'	5250								

BURNETT OIL CO., INC.

Location: Water Injection Station

Table 1 - Analytical Results

Date	Sample ID	Depth	Chloride	TPH - GRO	TPH - DRO	TPH-Total	Benzene	Toluene	Ethylbenzene	Xylene	BTEX
3/9/2017	SP-11	0-1'	ND								
		1'-2'	ND								
		2'-3'	ND								
		3'-4'	ND								
		4'-5'	ND								
	SP-12	0-1'	ND								
		1'-2'	ND								
		2'-3'	7.91								
		3'-4'	13.3								
		4'-5'	21.6								
	SP-13	0-1'	ND								
		1'-2'	18.2								

BURNETT OIL CO., INC.

Location: Water Injection Station

Table 1 - Analytical Results

Date	Sample ID	Depth	Chloride	TPH - GRO	TPH - DRO	TPH-Total	Benzene	Toluene	Ethylbenzene	Xylene	BTEX
	SP-13	2'-3'	338								
		3'-4'	1480								
		4'-5'	1610								
	SP-14	0-1'	ND								
		1'-2'	228								
		2'-3'	4580								
		3'-4'	3220								
		4'-5'	1690								

BURNETT OIL CO., INC.

Location: Water Injection Station

Table 1 - Analytical Results

Date	Sample ID	Depth	Chloride	TPH - GRO	TPH - DRO	TPH-Total	Benzene	Toluene	Ethylbenzene	Xylene	BTEX
4/4/2017	SB-1	5'	919								
4/4/2017	SB-1	10'	NA	too silty, unable to collect sample for field screen							
4/4/2017	SB-1	15'	1007								
4/4/2017	SB-1	20'	714								
4/4/2017	SB-1	25'	727								
4/4/2017	SB-1	30'	740								
4/4/2017	SB-1	35'	960								
3/31/2017	SB-2	5'	1425								
3/31/2017	SB-2	10'	1769								
3/31/2017	SB-2	15'	980								
3/31/2017	SB-2	20'	1844								
3/31/2017	SB-2	25'	1655								

BURNETT OIL CO., INC.

Location: Water Injection Station

Table 1 - Analytical Results

Date	Sample ID	Depth	Chloride	TPH - GRO	TPH - DRO	TPH-Total	Benzene	Toluene	Ethylbenzene	Xylene	BTEX
3/31/2017	SB-2	30'	750								
3/31/2017	SB-2	35'	1330								
3/30/2017	SB-3	5'	3431								
3/30/2017	SB-3	10'	3940								
3/30/2017	SB-3	15'	6414								
3/30/2017	SB-3	20'	1610								
3/30/2017	SB-3	25'	1377								
3/30/2017	SB-3	30'	1545								

BURNETT OIL CO., INC.

Location: Water Injection Station

Table 1 - Analytical Results

Date	Sample ID	Depth	Chloride	TPH - GRO	TPH - DRO	TPH-Total	Benzene	Toluene	Ethylbenzene	Xylene	BTEX
8/29/2018	SP-1	0-1'	380								
8/29/2018	SP-1	1'-2'	490								
8/29/2018	SP-1	2'-3'	640								
8/29/2018	SP-1	3'-4'	610								
8/29/2018	SP-1	4'-5'	320								
8/29/2018	SP-1	5'-6'	390								
8/29/2018	SP-1	6'-7'	480								
8/29/2018	SP-1	7'-8'	560								
8/29/2018	SP-1	8'-9'	630								
8/29/2018	SP-1	9'-10'	660								
8/29/2018	SP-2	0-1'	ND								
8/29/2018	SP-2	1'-2'	76								

BURNETT OIL CO., INC.

Location: Water Injection Station

Table 1 - Analytical Results

Date	Sample ID	Depth	Chloride	TPH - GRO	TPH - DRO	TPH-Total	Benzene	Toluene	Ethylbenzene	Xylene	BTEX
8/29/2018	SP-2	2'-3'	ND								
8/29/2018	SP-2	3'-4'	ND								
8/29/2018	SP-2	4'-5'	ND								
8/29/2018	SP-3	0-1'	ND								
8/29/2018	SP-3	1'-2'	100								
8/29/2018	SP-3	2'-3'	210								
8/29/2018	SP-3	3'-4'	180								
8/29/2018	SP-3	4'-5'	150								
8/29/2018	SP-3	5'-6'	95								
8/29/2018	SP-3	6'-7'	75								
8/29/2018	SP-3	7'-8'	66								
8/29/2018	SP-3	8'-9'	72								

BURNETT OIL CO., INC.

Location: Water Injection Station

Table 1 - Analytical Results

Date	Sample ID	Depth	Chloride	TPH - GRO	TPH - DRO	TPH-Total	Benzene	Toluene	Ethylbenzene	Xylene	BTEX
2/27/2019	SP-4	0-1'	ND								
2/27/2019	SP-4	1'-2'	ND								
2/27/2019	SP-4	2'-3'	60								
2/27/2019	SP-4	3'-4'	ND								
2/27/2019	SP-4	4'-5'	62								
2/27/2019	SP-4	5'-6'	ND								
2/27/2019	SP-4	6'-7'	ND								
2/27/2019	SP-4	7'-8'	ND								
2/27/2019	SP-4	8'-9'	ND								
2/27/2019	SP-4	9'-10'	ND								

BURNETT OIL CO., INC.

Location: Water Injection Station

Table 1 - Analytical Results

Date	Sample ID	Depth	Chloride	TPH - GRO	TPH - DRO	TPH-Total	Benzene	Toluene	Ethylbenzene	Xylene	BTEX
2/16/2019	SP-5	0-1'	ND								
2/16/2019	SP-5	1'-2'	ND								
2/16/2019	SP-5	2'-3'	ND								
2/16/2019	SP-5	3'-4'	ND								
2/16/2019	SP-5	4'-5'	ND								
2/16/2019	SP-6	0-1'	ND								
2/16/2019	SP-6	1'-2'	ND								
2/16/2019	SP-6	2'-3'	190								
2/16/2019	SP-6	3'-4'	210								
2/16/2019	SP-6	4'-5'	530								
2/16/2019	SP-7	0-1'	ND								
2/16/2019	SP-7	1'-2'	ND								

BURNETT OIL CO., INC.

Location: Water Injection Station

Table 1 - Analytical Results

Date	Sample ID	Depth	Chloride	TPH - GRO	TPH - DRO	TPH-Total	Benzene	Toluene	Ethylbenzene	Xylene	BTEX
2/16/2019	SP-7	2'-3'	ND								
2/16/2019	SP-7	3'-4'	ND								
2/16/2019	SP-7	4'-5'	ND								
2/16/2019	SP-8	0-1'	99								
2/16/2019	SP-8	1'-2'	280								
2/16/2019	SP-8	2'-3'	760								
2/16/2019	SP-8	3'-4'	990								
2/16/2019	SP-8	4'-5'	1100								
2/16/2019	SP-9	0-1'	220								
2/16/2019	SP-9	1'-2'	160								
2/16/2019	SP-9	2'-3'	410								
2/16/2019	SP-9	3'-4'	630								

BURNETT OIL CO., INC.

Location: Water Injection Station

Table 1 - Analytical Results

Date	Sample ID	Depth	Chloride	TPH - GRO	TPH - DRO	TPH-Total	Benzene	Toluene	Ethylbenzene	Xylene	BTEX
2/16/2019	SP-9	4'-5'	620								
2/16/2019	SP-10	0-1'	460								
2/16/2019	SP-10	1'-2'	250								
2/16/2019	SP-10	2'-3'	800								
2/16/2019	SP-10	3'-4'	900								
2/16/2019	SP-10	4'-5'	800								

BURNETT OIL CO., INC.

Location: Water Injection Station

Table 1 - Analytical Results

Date	Sample ID	Depth	Chloride	TPH - GRO	TPH - DRO	TPH-Total	Benzene	Toluene	Ethylbenzene	Xylene	BTEX
2/27/2019	SP-14	0-1'	ND								
2/27/2019	SP-14	1'-2'	ND								
2/27/2019	SP-14	2'-3'	ND								
2/27/2019	SP-14	3'-4'	ND								
2/27/2019	SP-14	4'-5'	ND								
2/27/2019	SP-14	5'-6'	ND								
2/27/2019	SP-14	6'-7'	ND								
2/27/2019	SP-14	7'-8'	ND								
2/27/2019	SP-14	8'-9'	ND								
2/27/2019	SP-14	9'-10'	ND								

BURNETT OIL CO., INC.

Location: Water Injection Station

Table 1 - Analytical Results

Date	Sample ID	Depth	Chloride	TPH - GRO	TPH - DRO	TPH-Total	Benzene	Toluene	Ethylbenzene	Xylene	BTEX
5/18/2019	SP-8	0-1'	ND	ND	ND	ND					
5/18/2019	SP-8	1'-2'	ND								
5/18/2019	SP-8	2'-3'	180								
5/18/2019	SP-8	3'-4'-	3100								
5/18/2019	SP-8	4'-5'	390								
5/18/2019	SP-8	5'-6'	300								
5/18/2019	SP-8	6'-7'	3600								
5/18/2019	SP-8	7'-8'	260								
5/18/2019	SP-10	0-1'	750	ND	ND	ND					
5/18/2019	SP-10	1'-2'	1500								
5/18/2019	SP-10	2'-3'	2000								
5/18/2019	SP-10	3'-4'	640								

BURNETT OIL CO., INC.

Location: Water Injection Station

Table 1 - Analytical Results

Date	Sample ID	Depth	Chloride	TPH - GRO	TPH - DRO	TPH-Total	Benzene	Toluene	Ethylbenzene	Xylene	BTEX
5/18/2019	SP-10	4'-5'	3600								
5/18/2019	SP-10	5'-6'	3100								
5/18/2019	SP-10	6'-7'	330								
5/18/2019	SP-10	7'-8'	4500								

BURNETT OIL CO., INC.

Location: Water Injection Station

Table 1 - Analytical Results

Date	Sample ID	Depth	Chloride	TPH - GRO	TPH - DRO	TPH-Total	Benzene	Toluene	Ethylbenzene	Xylene	BTEX
9/13/2019	SP-8	0-1'	ND								
9/13/2019	SP-8	1'-2'	ND								
9/13/2019	SP-8	2'-3'	ND								
9/13/2019	SP-8	3'-4'	ND								
9/13/2019	SP-8	4'-5'	ND								
9/13/2019	SP-10	0-1'	ND								
9/13/2019	SP-10	1'-2'	ND								
9/13/2019	SP-10	2'-3'	ND								
9/13/2019	SP-10	3'-4'	ND								
9/13/2019	SP-10	4'-5'	ND								