



June 8, 2023

New Mexico Oil Conservation Division

New Mexico Energy, Minerals, and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**Re: Remediation Work Plan
Mesa 8105-JV-P 004H
Incident Number nOY1831160155
Lea County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of BTA Oil Producers, LLC (BTA), has prepared the following *Remediation Work Plan (Work Plan)* for the October 23, 2018, crude oil and produced water release at the Mesa 8105-JV-P 004H (Site). The following *Work Plan* proposes to complete Site assessment and delineation activities to assess for the presence or absence of impacts to soil resulting from the historical release at the Site.

SITE DESCRIPTION AND RELEASE SUMMARY

The Site is located in Unit C, Section 11, Township 26 South, Range 32 East, in Lea County, New Mexico (32.065054°, -103.64362°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM).

On October 23, 2018, a water transfer line was cut in half during pipeline construction operations and resulted in the release of approximately 60 barrels (bbls) of produced water and 15 bbls of crude oil into the surrounding pasture area. A vacuum truck was dispatched to the Site to recover free-standing fluids; approximately 50 bbls of produced water and 8 bbls of crude oil were recovered. The release impacted an approximate 9,688 square foot area on the south side of the lease road. BTA reported the release immediately via email to the New Mexico Oil Conservation Division (NMOCD) and submitted a *Release Notification Form C-141* (Form C-141) on November 7, 2018. The release was assigned Incident Number nOY1831160155.

SITE CHARACTERIZATION AND CLOSURE CRITERIA

The Site was characterized to assess the applicability of Table I, Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29 (19.15.29) of the New Mexico Administrative Code (NMAC). Results from the characterization desktop review are presented on page 3 of the Form C-141, Site Assessment/Characterization. Potential Site receptors are identified on Figure 1.

Depth to groundwater at the Site is estimated to be greater than 100 feet below ground surface (bgs) based on the nearest groundwater well data. The closest permitted groundwater well with depth to groundwater data is New Mexico Office of the State Engineer (NMOSE) well C-04549, located

BTA Oil Producers, LLC
Remediation Work Plan
Mesa 8105-JV-P 004H

approximately 0.5 miles west of the Site. The soil boring was drilled during July 2021 to a total depth of 103 feet bgs, and no groundwater was encountered. All wells used for depth to groundwater determination are presented on Figure 1. The associated well records are included in Appendix A.

The closest continuously flowing or significant watercourse to the Site is a dry wash, located approximately 900 feet east of the Site. The Site is greater than 200 feet from a lakebed, sinkhole, or playa lake and greater than 300 feet from an occupied residence, school, hospital, institution, church, or wetland. The Site is greater than 1,000 feet to a freshwater well or spring and is not within a 100-year floodplain or overlying a subsurface mine. The Site is not underlain by unstable geology (medium potential karst designation area). Site receptors are identified on Figure 1.

Based on the results of the Site Characterization, the following NMOCD Table I Closure Criteria (Closure Criteria) apply:

- Benzene: 10 milligrams per kilogram (mg/kg)
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg
- Total petroleum hydrocarbons (TPH)-gasoline range organics (GRO) and TPH-diesel range organics (DRO): 1,000 mg/kg
- TPH: 2,500 mg/kg
- Chloride: 20,000 mg/kg

A reclamation requirement of 600 mg/kg chloride and 100 mg/kg TPH was applied to the top 4 feet of the pasture area that was impacted by the release, per 19.15.29.13.D (1) NMAC for the top 4 feet of areas that will be immediately reclaimed following remediation.

PROPOSED REMEDIATION WORK PLAN

Based on the unrecovered volume of crude oil and produced water and the age of the release, BTA proposes to complete Site assessment and delineation activities within and around the documented release extent to assess for the presence or absence of impacted soil resulting from the historical release at the Site. The documented release extent from October 2018 is depicted on the attached Figure 2. BTA requests approval to complete the following remediation activities:

- Soil samples will be collected outside of the documented release extent from a depth of 0.5 feet bgs to confirm the lateral extent of the surface release.
- Boreholes will be advanced via hand auger within the documented release extent to assess the vertical extent of impacted soil or determine if remediation activities have been previously completed.
- The proposed borehole and soil sample locations are shown on the attached Figure 3. Borehole locations may need to be adjusted slightly during field activities based on the location of underground utilities.
- Soil from the boreholes will be field screened at 1-foot intervals for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID) and chloride using Hach® chloride QuanTab® test strips. Field screening results and observations will be logged on lithologic/soil sampling logs. Two delineation samples from each borehole will be submitted for laboratory analysis; the sample with the highest field screening result and the sample from the final borehole depth.

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- Final depth of the boreholes will be determined by field screening results indicating compliance with the reclamation requirement in the top four feet or the Site Closure Criteria at depths greater than 4 feet. In the absence of elevated field screening results, the boreholes will be advanced to a depth of 4 feet bgs.
- The soil samples will be placed directly into pre-cleaned glass jars, labeled with the location, date, time, sampler name, method of analysis, and immediately placed on ice. The soil samples will be transported under strict chain-of-custody procedures to Cardinal Laboratories (Cardinal) in Hobbs, New Mexico, for analysis of the following COCs: BTEX following United States Environmental Protection Agency (EPA) Method 8021B; TPH-GRO, TPH-DRO, and TPH-oil range organics (ORO) following EPA Method 8015M/D; and chloride following EPA Method SM4500.
- Upon completion of the lateral and vertical delineation activities and review of the laboratory analytical results, BTA will prepare a follow-up *Remediation Work Plan* proposing additional remediation activities, if warranted, or a *Closure Request* if no impacted soil is identified.

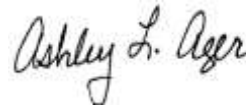
BTA will complete the delineation activities within 90 days of the date of approval of this *Work Plan* by the NMOCD. BTA believes the scope of work described above meets requirements set forth in 19.15.29.13 NMAC and is protective of human health, the environment, and groundwater. As such, BTA respectfully requests approval of this *Work Plan* for Incident Number nOY1831160155.

If you have any questions or comments, please contact Ms. Tacoma Morrissey at (337) 257-8307 or tmorrissey@ensolum.com.

Sincerely,
Ensolum, LLC



Hadlie Green
Project Geologist



Ashley Ager, M.S., PG
Principal

cc: Kelton Beaird, BTA
Nathan Sirgo, BTA
Bureau of Land Management

Appendices:

Figure 1	Site Receptor Map (2023)
Figure 2	Documented Release Extent (2018)
Figure 3	Proposed Delineation Soil Sample Locations (2023)
Appendix A	Referenced Well Records
Appendix B	Final C-141



FIGURES

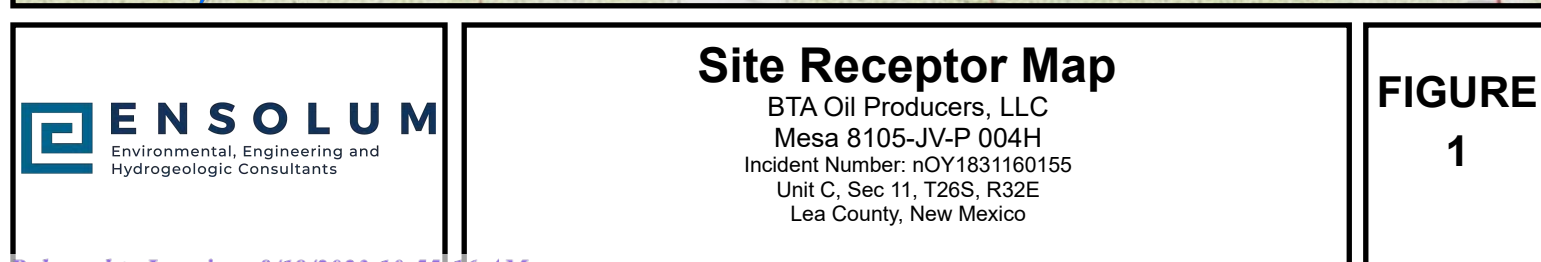
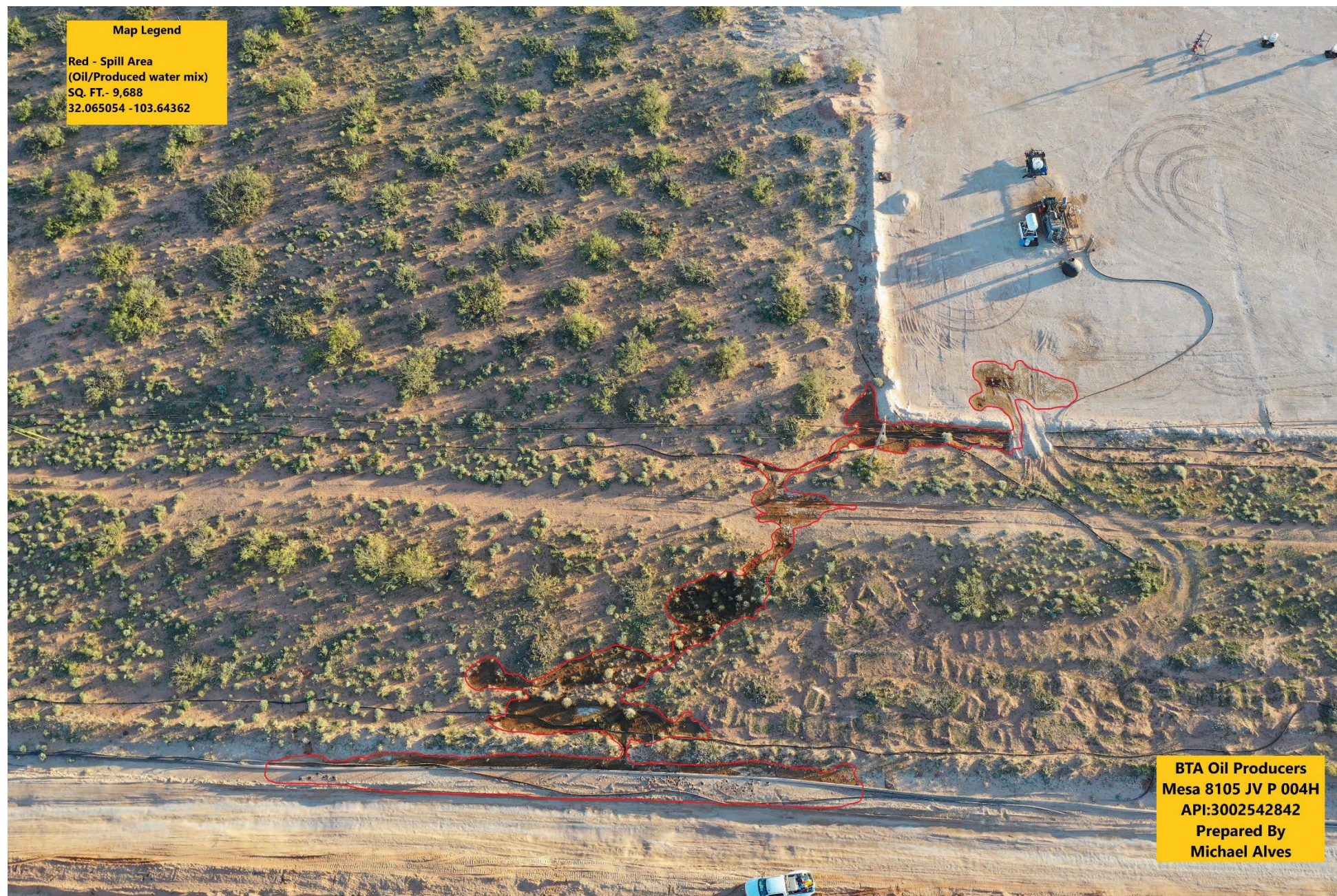
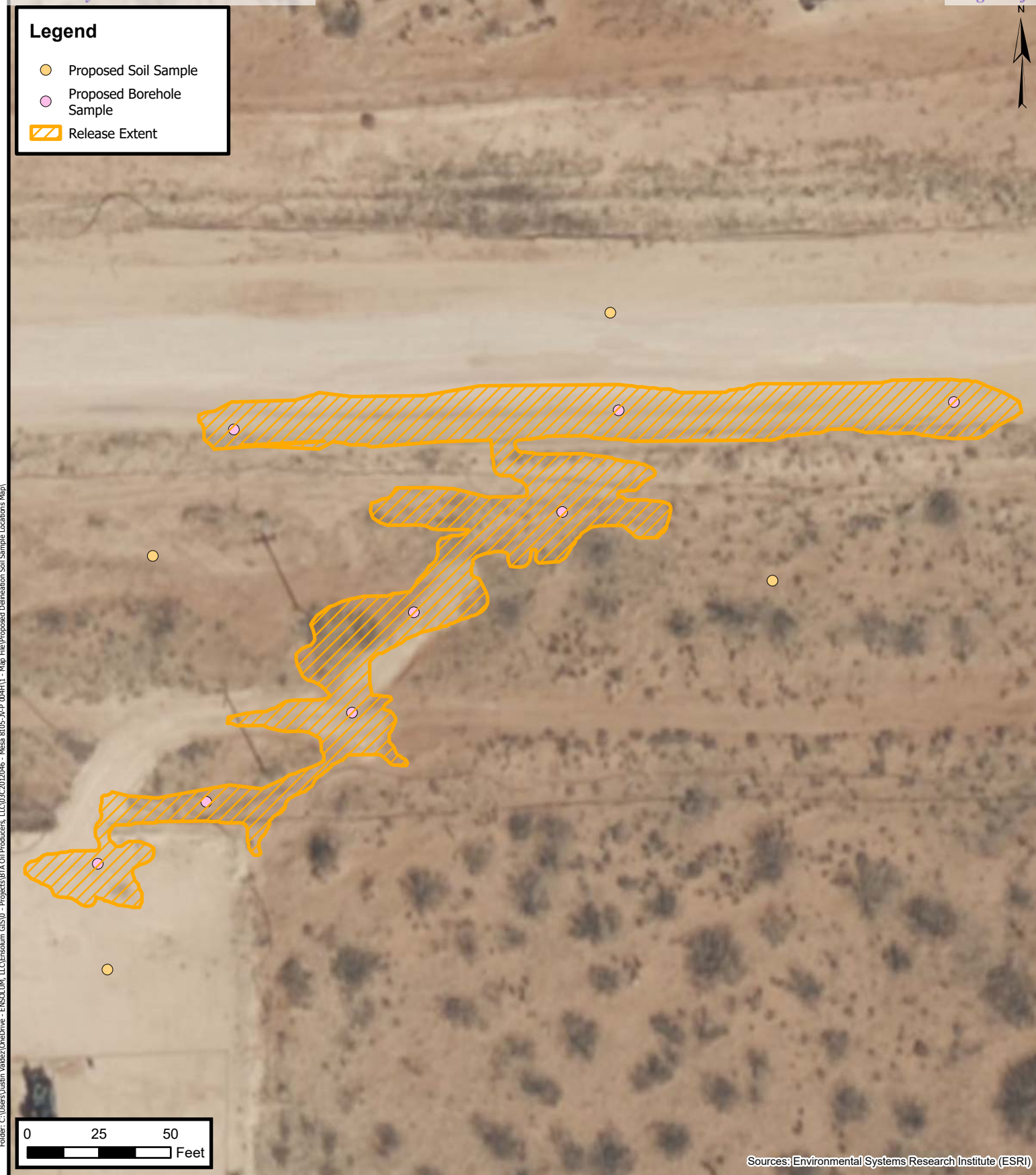


Figure 2
Documented Release Extent (October 2018)





Proposed Delineation Soil Sample Locations

BTA Oil Producers, LLC
Mesa 8105-JV-P 004H
Incident Number: nOY1831160155
Unit C, Sec 11, T26S, R32E
Lea County, New Mexico

FIGURE
3



APPENDIX A

Referenced Well Records



WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER
www.ose.state.nm.us

OSE DJT AUG 2 2021 PM 4:45

1. GENERAL AND WELL LOCATION	OSE POD NO. (WELL NO.) POD1 (MW-1)		WELL TAG ID NO. n/a		OSE FILE NO(S). C-4549			
	WELL OWNER NAME(S) BTA Oil Producers				PHONE (OPTIONAL)			
	WELL OWNER MAILING ADDRESS 104 S. Pecos St.				CITY Midland	STATE TX	ZIP 79701	
	WELL LOCATION (FROM GPS)	DEGREES LATITUDE 32	MINUTES 4	SECONDS 40.92	N	* ACCURACY REQUIRED: ONE TENTH OF A SECOND		
		LONGITUDE 103	37	53.68	W	* DATUM REQUIRED: WGS 84		
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS - PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE NW NW NW Sec. 11 T26S R32E								
2. DRILLING & CASING INFORMATION	LICENSE NO. 1249		NAME OF LICENSED DRILLER Jackie D. Atkins			NAME OF WELL DRILLING COMPANY Atkins Engineering Associates, Inc.		
	DRILLING STARTED 07/14/2021		DRILLING ENDED 07/14/2021		DEPTH OF COMPLETED WELL (FT) temporary well material	BORE HOLE DEPTH (FT) 103	DEPTH WATER FIRST ENCOUNTERED (FT) n/a	
	COMPLETED WELL IS: <input type="checkbox"/> ARTESIAN <input checked="" type="checkbox"/> DRY HOLE <input type="checkbox"/> SHALLOW (UNCONFINED)					STATIC WATER LEVEL IN COMPLETED WELL (FT) n/a		
	DRILLING FLUID: <input checked="" type="checkbox"/> AIR <input type="checkbox"/> MUD ADDITIVES - SPECIFY:							
	DRILLING METHOD: <input type="checkbox"/> ROTARY <input type="checkbox"/> HAMMER <input type="checkbox"/> CABLE TOOL <input checked="" type="checkbox"/> OTHER - SPECIFY: Hollow Stem Auger							
	DEPTH (feet bgl) FROM TO		BORE HOLE DIAM (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)	CASING CONNECTION TYPE (add coupling diameter)	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)	SLOT SIZE (inches)
	0 103		±8.5	Boring- HSA	--	--	--	--
3. ANNULAR MATERIAL	DEPTH (feet bgl) FROM TO		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL	AMOUNT (cubic feet)	METHOD OF PLACEMENT		

FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 06/30/17)


FILE NO. C-4549	POD NO. 1	TRN NO. 698318
LOCATION 26S-32E-11	1.1.1	WELL TAG ID NO. NA -

PAGE 1 OF 2

OSE DTI AUG 2 2021 PM4:45

4. HYDROGEOLOGIC LOG OF WELL	DEPTH (feet bgl)		THICKNESS (feet)	COLOR AND TYPE OF MATERIAL ENCOUNTERED - INCLUDE WATER-BEARING CAVITIES OR FRACTURE ZONES (attach supplemental sheets to fully describe all units)	WATER BEARING? (YES / NO)	ESTIMATED YIELD FOR WATER- BEARING ZONES (gpm)
	FROM	TO				
	0	4	4	Caliche, Consolidated, White	Y ✓ N	
	4	9	5	Caliche, Consolidated, with fine-grained, Tan	Y ✓ N	
	9	14	5	Caliche, Consolidated, White	Y ✓ N	
	14	19	5	Caliche, Consolidated, with fine-grained, Tan	Y ✓ N	
	19	69	50	Sand, Fine-grained poorly graded, with caliche, Tanish Brown	Y ✓ N	
	69	79	103	Clay, Stiff, High Plasticity, Dark Brown,	Y ✓ N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
METHOD USED TO ESTIMATE YIELD OF WATER-BEARING STRATA: <input type="checkbox"/> PUMP <input type="checkbox"/> AIR LIFT <input type="checkbox"/> BAILER <input type="checkbox"/> OTHER - SPECIFY:					TOTAL ESTIMATED WELL YIELD (gpm): 0.00	

5. TEST; RIG SUPERVISION	WELL TEST		TEST RESULTS - ATTACH A COPY OF DATA COLLECTED DURING WELL TESTING, INCLUDING DISCHARGE METHOD, START TIME, END TIME, AND A TABLE SHOWING DISCHARGE AND DRAWDOWN OVER THE TESTING PERIOD.
MISCELLANEOUS INFORMATION:			Temporary well materials removed and the soil boring backfilled using drill cuttings from total depth to ten feet below ground surface, then hydrated bentonite chips from ten feet below ground surface to surface.
PRINT NAME(S) OF DRILL RIG SUPERVISOR(S) THAT PROVIDED ONSITE SUPERVISION OF WELL CONSTRUCTION OTHER THAN LICENSEE: Shane Eldridge, Cameron Pruitt, Carmelo Trevino			

6. SIGNATURE	THE UNDERSIGNED HEREBY CERTIFIES THAT, TO THE BEST OF HIS OR HER KNOWLEDGE AND BELIEF, THE FOREGOING IS A TRUE AND CORRECT RECORD OF THE ABOVE DESCRIBED HOLE AND THAT HE OR SHE WILL FILE THIS WELL RECORD WITH THE STATE ENGINEER AND THE PERMIT HOLDER WITHIN 30 DAYS AFTER COMPLETION OF WELL DRILLING:	
 Jackie D. Atkins	07/29/2021	
SIGNATURE OF DRILLER / PRINT SIGNEE NAME		
DATE		

FOR USE INTERNAL USE		WR-20 WELL RECORD & LOG (Version 06/30/2017)	
FILE NO. C-4549	POD NO. 1	TRN NO. 698318	
LOCATION 26S-32E-11	1.1.1	WELL TAG ID NO. NA	PAGE 2 OF 2

Lea County, New Mexico
Latitude 32°01'35.2", Longitude 103°41'01.8" NAD83
Land-surface elevation 3,130 feet above NAVD88
The depth of the well is 405 feet below land surface.
The depth of the hole is 405 feet below land surface.
This well is completed in the Pecos River Basin alluvial aquifer (N100PCSRVR) national aquifer.
This well is completed in the Dockum Group (231DCKM) local aquifer.

Output formats

[Table of data](#)

[Tab-separated data](#)

[Graph of data](#)

[Reselect period](#)

Date	Time	Water-level date-time accuracy	Parameter code	Water level, feet below land surface	Water level, feet above specific vertical datum	Referenced vertical datum	Status	Method of measurement	Measuring agency	Source of measurement	Water-level approval status
1993-06-16		D	62610		2723.41	NGVD29	1	L			A
1993-06-16		D	62611		2725.00	NAVD88	1	L			A
1993-06-16		D	72019	405.00			1	L			A
2013-01-16	19:10 UTC	m	62610		2906.47	NGVD29	P	S	USGS	S	A
2013-01-16	19:10 UTC	m	62611		2908.06	NAVD88	P	S	USGS	S	A
Released to Imaging: 8/18/2023 10:55:16 AM		m	72019	221.94			P	S	USGS	S	A



APPENDIX B

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	pOY1831158528
District RP	1RP-5261
Facility ID	
Application ID	NOY1831160155

Release Notification

Responsible Party

Responsible Party BTA Oil Producers	OGRID NM1195/NMB000849	260297
Contact Name Ben Grimes	Contact Telephone	432-682-3753
Contact email bgrimes@btaoil.com	Incident # (assigned by OCD)	NOY1831160155
Contact mailing address	104 South Pecos St. Midland, TX 79701	

Location of Release Source

Latitude 32.065054

Longitude 103.64362
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Mcsa 8105-JV-P 004H (Closest well related)	Site Type flowline/transfer
Date Release Discovered Oct 23 rd , 2018	API# (if applicable) 30-025-42842

Unit Letter	Section	Township	Range	County
C	11	26S	32E	Lea

Federal minerals

Medium cave karst

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	15 bbl. released	Volume Recovered 8 bbl.
<input checked="" type="checkbox"/> Produced Water	Volume Released- 60 bbl.	Volume Recovered 50 bbl.
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No not known at this time
<input type="checkbox"/> Condensate	Volume Released (bbl.)	Volume Recovered (bbl.)
<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; On October 23rd, 2018 at approx. 10am the foreman found a spill on the south side of pipeline road. The water transfer line was cut in half which appeared to be from a piece of equipment most likely used during the pipeline construction currently on the same road. The line was isolated and repaired. A vacuum truck was called and recovered approx. 8 bbl of oil and approx. 50 bbl. of water. The spill area is approx. 9688 square ft. and prob has migrated at least 1 ft, BGS due to rain and sandy soil in spill area. The spill area was calculated by google earths measuring system using GPS points of spill. Environmental consultants will be retained to remediate spill and submit documentation.

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Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? Spill falls under 19.15.29.7 (A) (1) an un authorized release of 25 bbl or more.
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc.)? At 2:59 pm on October 23 rd notice was sent in an email to Maxey G with the NMOCD	

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 type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input 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: <u>Ben Grimes</u>	Title: <u>Production Manager</u>
Signature: <u>Ben Grimes</u>	Date: <u>11/7/2018</u>
email: <u>Bgrimes@BTAOIL.com</u>	Telephone: <u>432-682-3753</u>
OCD Only Received by: RECEIVED By Olivia Yu at 8:18 am, Nov 08, 2018 Date: _____	

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

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: 11/7/2018
email: BGrimes@BTAoil.com Telephone: 432-682-3753

OCD Only

Received by: _____ Date: _____

Incident ID	nOY1831160155
District RP	1RP-5261
Facility ID	
Application ID	

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

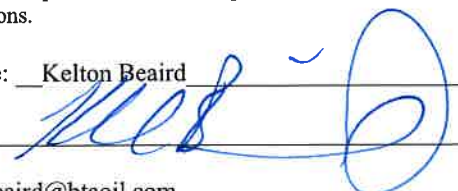
Form C-141

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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: Kelton BeairdTitle: Environmental ManagerSignature: Date: 6/9/2023email: KBeaird@btaoil.comTelephone: 432-312-2203**OCD Only**Received by: Jocelyn HarimonDate: 06/09/2023

Form C-141

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State of New Mexico
Oil Conservation Division

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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: Kelton BeairdTitle: Environmental ManagerSignature: Date: 6/9/2023email: KBeaird@btaoil.comTelephone: 432-312-2203**OCD Only**Received by: Jocelyn Harimon Date: 06/09/2023☐ Approved ☒ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral ApprovedSignature: Date: 8/18/2023

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 225739

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 225739
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
jharimon	Remediation Plan is conditionally approved. Horizontal delineation must meet the requirements of the reclamation standards 19.15.29.13 NMAC (600 mg/kg Cl, 100 mg/kg TPH, 50 mg/kg BTEX, 10 mg/kg benzene) or OCD approved "background" values for the upper 4 feet of the impacted area. Soil standards below 4 feet must be delineated/remediated to Table I Closure Criteria for the approved site-specific depth to groundwater. A surface visual footprint alone is not sufficient when assessing the horizontal extent of the release. Laboratory data must be provided as evidence of delineation efforts. Confirmation soil samples must consist of a five-point composite sample representing a surface area of no more than 200 ft2 unless otherwise approved.	8/18/2023