



August 22, 2024

Solaris Water Midstream LLC
3305 Boyd Dr
Carlsbad, NM 88220

Attn: New Mexico Oil Conservation District
1220 S. St. Francis Drive
Santa Fe, NM 87505

Re: Notice of Liner Inspection
Lobo 285 SWD #1
NMCOD Incident Number: nAPP2420535238
32.12179 °, -104.07259°
Eddy County, New Mexico
Terracon Project No. KH247044

To Whom it May Concern:

On August 13, 2024, Terracon was contracted by Solaris Water Midstream LLC (Solaris) to conduct a Liner Inspection following the release of a reportable quantity of produced water within the lined secondary containment at the Lobo 285 SWD #1 (nAPP2420535238) site. The New Mexico Oil Conservation District (NMOCD) was notified of the release on a C-141 form submitted on July 19, 2024. Terracon personnel were informed that a reportable release of 15 barrels (bbls) of produced water within secondary containment had taken place at the site, and that Solaris had recovered a total of 15 bbls. Surface ownership is held by private owners.

Regulatory Criteria

The nearest groundwater elevation data obtained from the New Mexico Office of the State Engineer (NMOSE) website indicated that the depth to groundwater was measured to be 106 feet below grade surface (bgs) at a well located on the Lobo 285 SWD #1 site. A review of geospatial data obtained from the Bureau of Land Management (BLM) Carlsbad Field Office (CFO) website indicated that the site is within an area of medium risk for karst formations. Per New Mexico Administrative Code (NMAC) 19.15.29.12, remediation and closure criteria for a depth to groundwater of 51-100 feet were utilized for this release.

Liner Inspection Report

Lobo 285 SWD #1

Liner Inspection ■ Eddy County, New Mexico

August 22, 2024 ■ Terracon Project No. KH247044

**Remedial Activities**

On July 19, 2024, Solaris conducted recovery activities and were able to recover 15 bbls of the 15 bbls released. Terracon mobilized to the site on August 13, 2024, to conduct an initial broad-scope visual assessment and Liner Inspection.

Conclusion

In accordance with NMOCD 19.15.29.11.5a, the integrity of the battery containment liner was visually observed to be intact with no tears. Based on the volume of recovered fluids, lack of evidence of the release exiting the containment, and the observed integrity of the liner based on visual inspection, Solaris requests the concurrence of closure of the Lobo 285 SWD #1 – incident number nAPP2420535238.

Should you have any questions, please contact the undersigned at (806) 507-7057.

Sincerely,

Terracon

Prepared by:

A handwritten signature in blue ink, appearing to read 'Travis Casey', is written over a light blue rectangular background.

Travis Casey

Senior Staff Scientist

Reviewed by:

A handwritten signature in blue ink, appearing to read 'John Grams', is written over a light blue rectangular background.

John Grams

Environmental Department
Manager - Lubbock**Attachments****Appendix A – Exhibits**

Exhibit 1 – Site Map

Exhibit 2 – NMOSE POD Location Map

Exhibit 3 – Cave Karst Public UCP Map

Exhibit 4 – Photographic Log

Responsive ■ Resourceful ■ Reliable

APPENDIX A – EXHIBITS




DATA SOURCES: Bing 100 50 0 100 Feet



 Site Boundary

Project No.:
KH247044
Date:
Aug 13 2024
Drawn By:
JWL
Reviewed By:
JRG



4526 W Pierce St
Carlsbad, NM

PH. 806-300-0140 terracon.com



Site Location Map

Lobo 285 (Liner)
32.12180, -104.0718
Malaga, Eddy County, New Mexico

Exhibit

1




-  Site Boundary
-  NMOSE POD Location

Project No.:
KH247044

Date:
Aug 13 2024

Drawn By:
JWL

Reviewed By:
JRG



4526 W Pierce St
Carlsbad, NM

PH. 806-300-0140 terracon.com




NMOSE POD Location Map

Lobo 285 (Liner)
32.12180, -104.0718
Malaga, Eddy County, New Mexico


Exhibit

2



-  Site Boundary
- Karst Potential
 -  Low
 -  Medium
 -  High

Project No.:
KH247044
Date:
Aug 13 2024
Drawn By:
JWL
Reviewed By:
JRG



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Carlsbad, NM
PH. 806-300-0140 terracon.com

Cave Karst Public UCP Map

Lobo 285 (Liner)
32.12180, -104.0718
Malaga, Eddy County, New Mexico

Exhibit

3

Lobo 285 SWD #1 ■ Eddy County, New Mexico
August 13, 2024 ■ NMOCD ID: nAPP2420535238



PHOTO 1: NW Corner facing East



PHOTO 2: NE corner facing West, and the release area

Responsive ■ Resourceful ■ Reliable

Lobo 285 SWD #1 ■ Eddy County, New Mexico
August 13, 2024 ■ NMOCD ID: nAPP2420535238



08.13.2024 10:50 AM
32.1214, -104.07171
US Hwy 285, Malaga, NMA

PHOTO 3: SE corner facing West



08.13.2024 10:52 AM
32.12139, -104.07208
US Hwy 285, Malaga, NMA

PHOTO 4: SW corner facing East

Responsive ■ Resourceful ■ Reliable

Lobo 285 SWD #1 ■ Eddy County, New Mexico
August 13, 2024 ■ NMOCD ID: nAPP2420535238



PHOTO 5: Release area between the two Dissolved Air Filtration tanks (DAF) facing South



PHOTO 6: Release area South of DAF's

Responsive ■ Resourceful ■ Reliable

Lobo 285 SWD #1 ■ Eddy County, New Mexico
August 13, 2024 ■ NMOCD ID: nAPP2420535238



PHOTO 7: West of the two DAFs, and release area



PHOTO 8: East side of containment facing South

Responsive ■ Resourceful ■ Reliable

Lobo 285 SWD #1 ■ Eddy County, New Mexico
August 13, 2024 ■ NMOCD ID: nAPP2420535238



PHOTO 9: West side of containment facing North

Responsive ■ Resourceful ■ Reliable

Julian Romero

From: Rob Kirk
Sent: Thursday, August 8, 2024 8:56 AM
To: Smith, Chuck F; Guesnier, Joseph R
Cc: Julian Romero
Subject: FW: The Oil Conservation Division (OCD) has accepted the application, Application ID: 371760

Liner inspection response.

Rob Kirk
469-978-5620



From: OCDOnline@state.nm.us <OCDOnline@state.nm.us>
Date: Thursday, August 8, 2024 at 9:41 AM
To: Rob Kirk <rob.kirk@ariswater.com>
Subject: The Oil Conservation Division (OCD) has accepted the application, Application ID: 371760

Caution: This email originated from outside of the organization. Please take care when clicking links or opening attachments. When in doubt, contact IT

To whom it may concern (c/o Rob Kirk for SOLARIS WATER MIDSTREAM, LLC),

The OCD has received the submitted *Notification for Liner Inspection for a Release* (C-141L), for incident ID (n#) nAPP2420535238.

The liner inspection is expected to take place:

When: 08/13/2024 @ 10:00
Where: B-22-25S-28E 200 FNL 150 FEL (32.1218,-104.0718)

Additional Information: Nothing additional

Additional Instructions: Lobo 285 facility off of 285 south of Carlsbad just off of roadway, 32.12162, -104.07182

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, liner inspection pursuant to 19.15.29.11.A(5)(a) NMAC is required. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

- **Failure to notify the OCD of liner inspections including any changes in date/time per the requirements of 19.15.29.11.A(5)(a)(ii) NMAC, may result in the inspection not being accepted.**

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

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

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

QUESTIONS

Action 378288

QUESTIONS

Operator: SOLARIS WATER MIDSTREAM, LLC 9651 Katy Fwy Houston, TX 77024	OGRID: 371643
	Action Number: 378288
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2420535238
Incident Name	NAPP2420535238 LOBO 285 WATER REUSE FACILITY @ 0
Incident Type	Produced Water Release
Incident Status	Initial C-141 Approved

Location of Release Source	
Please answer all the questions in this group.	
Site Name	Lobo 285 Water Reuse Facility
Date Release Discovered	07/19/2024
Surface Owner	State

Incident Details	
Please answer all the questions in this group.	
Incident Type	Produced Water Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Equipment Failure Tank (Any) Produced Water Released: 15 BBL Recovered: 15 BBL Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	All captured and recovered in secondary containment.

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QUESTIONS, Page 2

Action 378288

QUESTIONS (continued)

Operator: SOLARIS WATER MIDSTREAM, LLC 9651 Katy Fwy Houston, TX 77024	OGRID: 371643
	Action Number: 378288
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	No
Reasons why this would be considered a submission for a notification of a major release	Unavailable.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

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	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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.

I hereby agree and sign off to the above statement	Name: Julian Romero Title: Environmental Advisor Email: julian.romero@ariswater.com Date: 07/24/2024
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QUESTIONS, Page 3

Action 378288

QUESTIONS (continued)

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	Action Number: 378288
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS**Site Characterization**

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). 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 in feet below ground surface (ft bgs)	Not answered.
What method was used to determine the depth to ground water	Not answered.
Did this release impact groundwater or surface water	Not answered.
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Not answered.
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Not answered.
An occupied permanent residence, school, hospital, institution, or church	Not answered.
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Not answered.
Any other fresh water well or spring	Not answered.
Incorporated municipal boundaries or a defined municipal fresh water well field	Not answered.
A wetland	Not answered.
A subsurface mine	Not answered.
An (non-karst) unstable area	Not answered.
Categorize the risk of this well / site being in a karst geology	Not answered.
A 100-year floodplain	Not answered.
Did the release impact areas not on an exploration, development, production, or storage site	Not answered.

Remediation Plan

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

Requesting a remediation plan approval with this submission	No
The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.	

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CONDITIONS

Action 378288

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Operator: SOLARIS WATER MIDSTREAM, LLC 9651 Katy Fwy Houston, TX 77024	OGRID: 371643
	Action Number: 378288
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	None	8/28/2024