

Released Volume Calculation – State BT N #1

Length	50 feet
Width	30 feet
Thickness	0.5 feet

750 gal = 18 Est. Total Bbls Released

Volume = $L \times W \times T$

Total Released Volume = 750 gallons (US, dry)

18 Bbls



Site Characterization Report and Remediation Workplan

April 28, 2025

**State BT N #001
Historical Release
API # 30-025-01012
Incident #nAPP2427382332
Lease No. E0-0026-13**

Prepared For:

BXP Operating, LLC
1515 Calle Sur, Suite 174
Hobbs, New Mexico 88240

Prepared By:

Crain Environmental
2925 East 17th Street
Odessa, Texas 79761

A handwritten signature in blue ink that reads 'Cynthia K. Crain'. Below the signature is a horizontal line.

Cynthia K. Crain, P.G.



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1.0 Introduction

Crain Environmental (CE), on behalf of BXP Operating, LLC (BXP), has prepared this Site Characterization Report and Remediation Workplan for the historical release at the State BT N #1 (Site), located in Unit Letter P, Section 34, Township 11 South, Range 33 East, Lea County, New Mexico. The global positioning system (GPS) coordinates for the Site are 33.316781, -103.594265. The property surface rights are owned by the State of New Mexico (Lease No. E0-0026-13). The location of the Site is depicted on Figure 1.

2.0 Background

On September 2, 2021, BXP received a letter from the New Mexico State Land Office (SLO) that identified bare ground indicating a potential past spill, and that the fence around the battery was down. The fence was repaired in September of 2021. On February 3, 2023, a barren area was observed north of the battery that measured approximately 50' x 30' and covered a total area of approximately 1,500 square feet (ft²). An area of stained soil was also observed around the heater treater (40' x 17') within the battery. The areas of remediation are shown on Figure 2.

A *Remediation Report and Closure Request* was submitted to the SLO on March 11, 2023. On July 1, 2024, BXP received notice from the SLO Environmental Compliance Office (ECO) that the report had been reviewed, and a sampling plan was requested.

On September 29, 2024, a Notification of Release (NOR) was submitted to the New Mexico Oil Conservation Division (NMOCD), and Incident #nAPP2427382332 was assigned.

In a conference call on April 17, 2025, the NMOCD stated that a sampling plan would not be approved.

This Site Characterization Report and Remediation Workplan has been prepared in accordance with 19.15.29.11 New Mexico Administrative Code (NMAC).

3.0 NMOCD Closure Criteria

Cleanup standards for spills are provided in 19.15.29 NMAC. The cleanup standards (described in the rule as "Closure Criteria") are based primarily on depth to groundwater but are also based on other criteria. Three different Closure Criteria are provided in the rule. The most stringent apply to sites where groundwater is found within 50 feet of the ground surface or if the release occurred within one of the following areas:

- Within 300 feet of any continuously flowing watercourse or any other significant watercourse.
- Within 200 feet of any lakebed, sinkhole or playa lake (measured from the ordinary highwater mark).
- Within 300 feet from an occupied permanent residence, school, hospital, institution or church.
- Within 500 feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes.
- Within 1,000 feet of any fresh water well or spring.
- Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to Section 3-27-3 NMSA 1978 as amended.
- Within 300 feet of a wetland.



- Within the area overlying a subsurface mine.
- Within an unstable area such as a karst formation.
- Within a 100-year floodplain.

CE reviewed available information to determine the Closure Criteria for the Site. The findings of this evaluation are summarized below.

3.1 Groundwater Evaluation

A review of the New Mexico Office of the State Engineer (NMOSE) records indicated there four water wells within a 0.5-mile radius of the Site; however, none of the wells were installed within the last 25 years. On March 28, 2025, CE measured a depth to groundwater of 43.1' below ground surface (bgs) in well L-01327 (located approximately 983' east of the Site). Based on the depth to groundwater in well L-01327, the most stringent NMOCD Closure Criteria will apply to the Site. Figure 3 provides a wellhead protection area map that shows the location of water wells within a 0.5-mile radius of the Site, as recorded with NMOSE. NMOSE water well records are provided in Appendix A.

Nearby Water Wells

Well ID	Location from Site	Year Installed	Use	Well Depth and Depth to Water (feet bgs)
L 09545	Approx. 1,332' to the northwest	1984	N/A	154 / 70
L 01327	Approx. 983' to the east	1951	N/A	115 / 55
L 01396	Approx. 2,568' to the southeast	1952	N/A	126 / 45
L 02165	Approx. 1,655' to the southeast	1950	N/A	114 / Not provided

3.2 Surface Features and Other Development

CE reviewed recent aerial photographs, topographic maps, the NMOSE Point of Discharge (POD) GIS website, and information available from the Lea County, New Mexico Central Appraisal District website. As shown on Figure 1, the Site is **not** located:

- Within 300 feet of any continuously flowing watercourse or any other significant watercourse.
 - No continuously flowing watercourses (rivers, streams, arroyos, etc.) are apparent within 300 feet of the Site in the aerial map (Figure 3).
- Within 200 feet of any lakebed, sinkhole or playa lake (measured from the ordinary highwater mark).
 - The aerial map (Figure 3) indicates there is not a lakebed, sinkhole or playa lake located within 200 feet of the Site.
- Within 300 feet from an occupied permanent residence, school, hospital, institution or church.
 - The Site Location Map (Figure 1) and information available from the Lea County, New Mexico Central Appraisal District do not show or list any permanent residence, school, hospital, institution, or church located within 300 feet of the Site.



- Within 500 feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes.
 - No wells or springs located within 500 feet of the Site appear in any of the NMOSE records reviewed by CE.
- Within 1,000 feet of any fresh water well or spring.
 - No freshwater wells or springs located within 1,000 feet of the Site appear in any of the records reviewed by CE.
- Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to Section 3-27-3 NMSA 1978 as amended.
 - Based on the property and other records review by CE, the Site is not located in incorporated municipal boundaries or within a defined municipal fresh water well field.
- Within the area overlying a subsurface mine
 - Based on the property and other records reviewed by CE, the Site is not located within an area overlying a subsurface mine.

3.3 Wetlands, Floodplain, and Karst Geology

A review of the United States Fish and Wildlife Service (USFWS) wetlands map indicated the Site is not located within 300 feet of a wetland. The New Mexico Bureau of Land Management (BLM) karst potential map indicates the Site is located within a “low karst potential” area. Finally, review of the Federal Emergency Management Act (FEMA) floodplain map indicates the release at the Site is located outside of a 100-year floodplain. Figures 4, 5, and 6 depict the USFWS map, the FEMA floodplain map, and the karst potential map, respectively.

3.4 Closure Criteria Applicable to the Site

The Closure Criteria applicable to the Site will be based on the depth to groundwater, which dictates the regulatory guidelines typically associated with groundwater depths less than 50’ feet bgs since a depth to groundwater measurement of 43.1’ bgs was obtained from well L-01327 on March 28, 2025. A summary of the Closure Criteria is provided in the table below and in Table 1.

NMOCD Closure Criteria

Constituent of Concern		Closure Criteria Based on Depth to Groundwater (mg/kg)		
		≤ 50 feet bgs	51 feet to 100 feet bgs	> 100 feet bgs
Chloride (EPA 300)		600	10,000	20,000
TPH (EPA 8015M)	GRO + DRO + MRO	100	2,500	2,500
	GRO + DRO	NA	1,000	1,000
Total BTEX (EPA 8021 or 8260)		50	50	50
Benzene (EPA 8021 or 8260)		10	10	10

Notes: NA = not applicable



bgs = below ground surface
mg/kg = milligrams per kilogram
GRO = gasoline range organics
DRO = diesel range organics
MRO = motor oil range organics
TPH = total petroleum hydrocarbons
BTEX = benzene, toluene, ethylbenzene, and total xylenes
Green highlighted cells denote applicable Closure Criteria.

4.0 Site Assessment/Characterization Results

As per 19.15.29.11 NMAC, a Site Characterization Report will have the components described in Sections 4.1 through 4.5 of this document.

4.1 Site Map

As required by 19.15.29.11 NMAC, a scaled diagram showing significant Site infrastructure, sample point locations, and known subsurface features such as utilities is provided as Figure 2.

4.2 Depth to Groundwater

As discussed in Section 3.1, the depth to groundwater was recorded at 43.1' bgs in well L-01327 (located 983' east of the Site) on March 28, 2025.

4.3 Wellhead Protection Area

The 0.5-mile wellhead protection area is shown on Figure 3. As listed in the NMOSE database, there are four water wells within a 0.5-mile radius of the Site. There were no water sources, springs, or other sources of freshwater extraction identified within 0.5-mile of the Site.

4.4 Distance to Nearest Significant Watercourse

The horizontal distance to the nearest significant watercourse as defined in Subsection P of 19.15.17.7 NMAC is greater than 0.5-mile from the Site.

4.5 Summary of Remediation Activities

From February 3 through February 7, 2023, Elite Environmental Services, LLC (Elite) conducted remediation of soil in the barren area north of the tank battery, and the area of stained soil around the heater treater within the tank battery.

To promote porosity of the soil, the areas north of the tank battery and around the heater treater were tilled with a high-speed tiller to depths between 6 and 10 inches and a 10 percent solution of hydrogen peroxide (H_2O_2) was applied. Following application of H_2O_2 the soil was tilled again, a reagent called Bio-Regen SA1000 was applied, and the soils were tilled again to ensure that all soil particles were introduced to the H_2O_2 and Bio-Regen SA 1000 products.

The Bio-Regen SA 1000 product is manufactured by 3Tier Technologies. The reagent is an advanced treatment product that combines two Polyelectrolyte Enhanced Organic Bio-Polymers (PEB) with bio-available calcium. PEB naturally binds, adsorbs, and coordinates sodium cations and chlorine anions. Any sodium/chloride residue creates a new mineral formation resulting in sodium, chloride, cation and anion



conversion into a physically and mechanically bound status, thus eliminating salt toxicity and resulting in desalination and chloride/salt toxicity reduction/elimination. This process also improves the growing profile by reversing negative osmotic pressure, reducing electrical conductivity, and increasing soluble organic matter, allowing proper nutrient and moisture retention, percolation, and uptake. As a result, new plants are allowed to establish and regenerate soil back to a healthy and productive state.

On February 8, 2023, Elite collected five-point composite samples 1A, 2A, and 3A from the treated area north of the battery, and a five-point composite sample 4A from the treated area around the heater treater. All samples were collected at a depth of 0 to 6 inches (") bgs.

All soil samples were placed in laboratory prepared containers, properly labeled, immediately placed on ice, and hand delivered to Cardinal Laboratories (Cardinal) in Hobbs, New Mexico for analysis of total petroleum hydrocarbons (TPH) by Environmental Protection Agency (EPA) SW-846 Method 8015 Modified, for benzene, toluene, ethylbenzene and xylenes (collectively referred to as BTEX) by EPA SW-846 Method 8021B, and for chlorides by Method SM4500Cl-B.

Table 1 provides a summary of the laboratory results, and sample locations with concentrations are provided on Figure 2. Appendix B provides a copy of the laboratory report and chain-of-custody documentation. Photographic documentation is provided in Appendix C.

Referring to Table 1, concentrations of TPH, BTEX, and chlorides were reported below the Closure Criteria in all samples.

5.0 Proposed Remediation Workplan

In compliance with the Cultural Properties Protection (CPP) Rule, a Cultural Survey was conducted at the BT N #1 site, and no cultural sites were identified. Appendix D provides a copy of the NMSLO Cultural Resources Cover Sheet for NMCRIS #156729.

A biological desktop review was conducted, and no critical habitats were found in proximity to the Site. A copy of the USFWS database review is included as Appendix E.

BXP proposes to remove all treated soil from the 50' x 30' area north of the battery, and from the 40' x 17' area around the heater treater and collect five-point composite confirmation samples from the bottom (at a depth of 2' bgs) and sidewalls of the excavations at a rate of one sample per 200 square feet.

Treated soil will be stockpiled adjacent to the excavation, and two soil samples from each excavation, representative of backfill in 1-foot lifts will be collected.

All samples from the excavation and the treated soil will be delivered to Eurofins Environment Testing (Eurofins) in Midland, Texas for analysis of TPH, BTEX, and chlorides.

Upon laboratory confirmation that all TPH, BTEX, and chloride concentrations from the bottom and sidewalls of the excavation, and from the treated soil are below the Closure Criteria, the treated soil (defined as non-waste containing material in 19.15.29.13 NMAC) will be used to backfill the excavation. If confirmation samples from the treated soil report any concentrations above the Closure Criteria, the treated soil will be hauled to an NMOCD approved disposal facility, and the excavations will be backfilled with clean soil obtained from a nearby pit.

Pursuant to 19.15.29.13 NMAC, the impacted surface areas will be restored to pre-release conditions. Surface grading will be performed to near original conditions and contoured to prevent erosion and



ponding, promote stability, and preserve storm water flow patterns. The area north of the battery will be seeded by seed drill method during the next favorable growing season using the NMSLO Coarse Seed Mix (planted in the amount specified in the pounds live seed (PSL) per acre), and fresh water will be applied for two consecutive weeks following seeding.

BXP respectfully requests a schedule of 90 days from the date of ECO approval of this Remediation Workplan to complete the proposed remediation activities and submit a Remediation Summary and Closure Report for NMOCD and ECO approval.

6.0 Distribution

- Copy 1: M. Y. Merchant
BXP Operating, LLC
1515 Calle Sur, Suite 174
Hobbs, New Mexico 88240
- Copy 2: C. Douglas Brown
BXP Operating, LLC
11757 Katy Freeway, Suite 475
Houston, Texas 77079
- Copy 3: New Mexico State Land Office
Environmental Compliance Office
ECO@nmslo.gov



TABLE

TABLE 1
SUMMARY OF SOIL SAMPLE ANALYTICAL RESULTS FROM EXCAVATION
BXP OPERATING, LLC
STATE BT N #001
LEASE NO. E0-0026-13

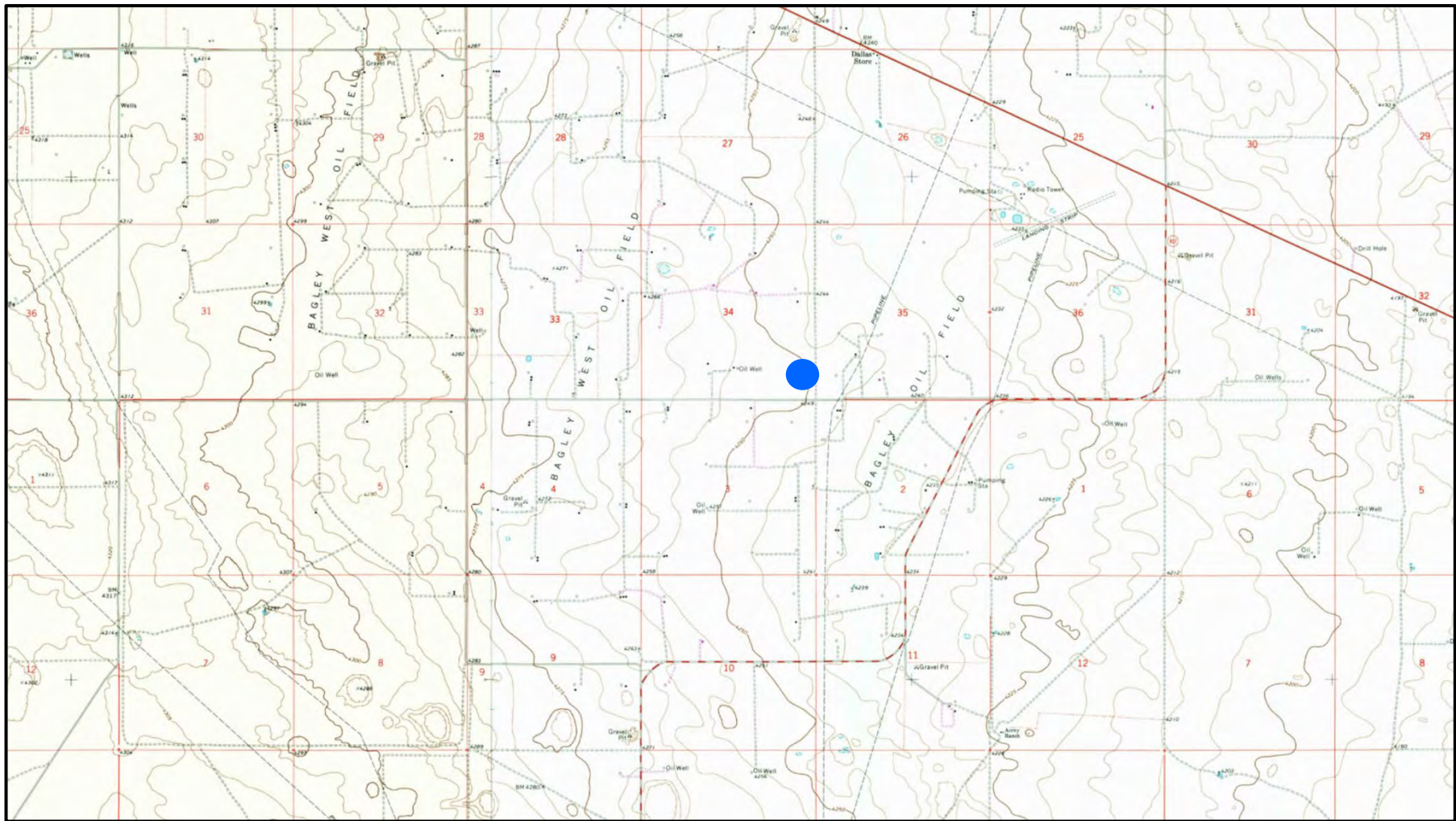
Sample ID	Sample Date	Sample Depth (feet bgs)	Soil Status	TPH (GRO)	TPH (DRO)	TPH (MRO)	Total TPH	Benzene	Toluene	Ethylbenzene	Total Xylenes	Total BTEX	Chloride
				milligrams per kilogram (mg/kg)									
NMOCD Closure Criteria				-	-	-	100	10	-	-	-	50	600
1A	02/08/23	0-6"	In Situ	<10.0	<10.0	<10.0	<10.0	<0.050	<0.050	<0.050	<0.150	<0.300	80.0
2A	02/08/23	0-6"	In Situ	<10.0	<10.0	<10.0	<10.0	<0.050	<0.050	<0.050	<0.150	<0.300	160
3A	02/08/23	0-6"	In Situ	<10.0	<10.0	<10.0	<10.0	<0.050	<0.050	<0.050	<0.150	<0.300	96.0
4A	02/08/23	0-6"	In Situ	<10.0	<10.0	<10.0	<10.0	<0.050	<0.050	<0.050	<0.150	<0.300	144




Notes:

1. GRO: Gasoline Range Organics
2. DRO: Diesel Range Organics
3. MRO: Motor Oil Range Organics
4. bgs: below ground surface
5. Bold and highlighting indicates the COC was detected above the NMOCD Closure Criteria.
6. < indicates the COC was below the appropriate laboratory method/sample detection limit






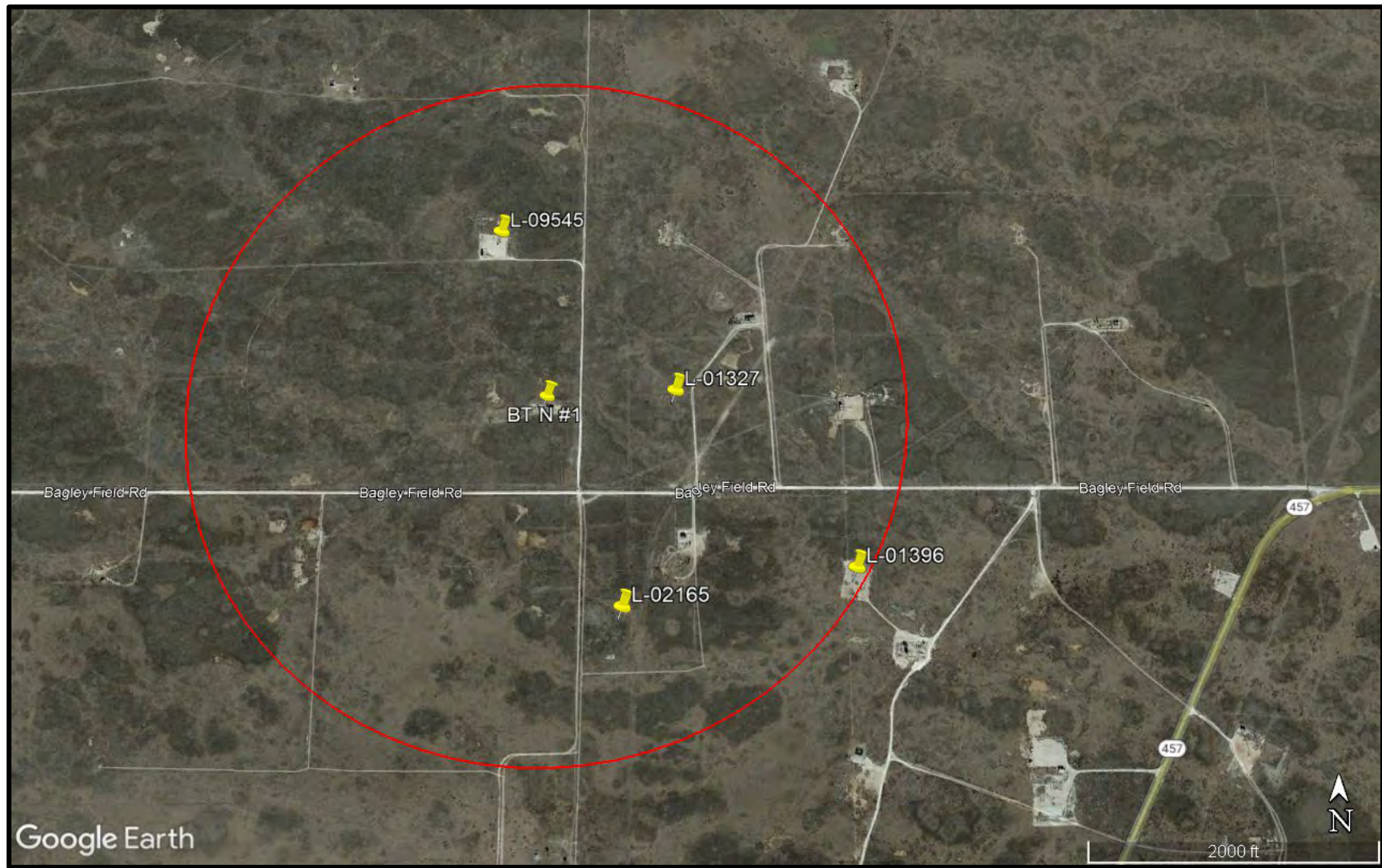
FIGURES



LEGEND:  Site Location Base Map from GAIA GPS		Figure 1 Site Location Map BXP Operating, LLC State BT N #001 Lea County, New Mexico		
			Drafted by: CC Checked by: CC	
			Draft: April 28, 2025	
			GPS: 33.316781° -103.594265°	



LEGEND:		Figure 2 Sample Location Map BXP Operating, LLC State BT N #001 Lea County, New Mexico		
	Treatment Boundary		Drafted by: CC Checked by: CC	
	Sample Location With Concentrations (mg/kg) and Depth (bgs)		Draft: April 28, 2025	
bgs:	Below ground surface		GPS: 33.316781° -103.594265°	



LEGEND:



Site and Water Well Locations



0.5 Mile Radius

Base Map from Google Earth

Figure 3

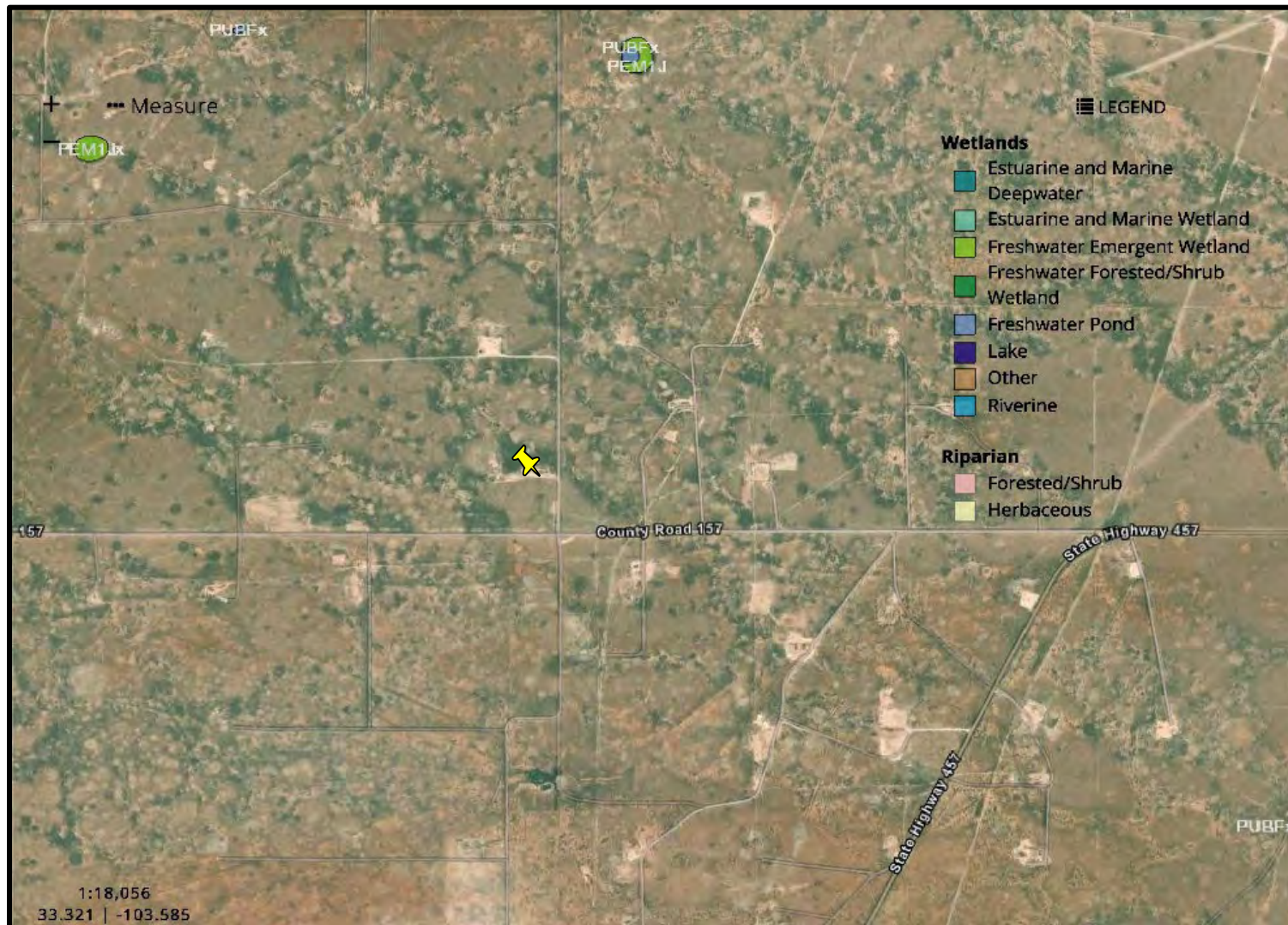
Wellhead Protection Area Map
BXP Operating, LLC
State BT N #001
Lea County, New Mexico



Drafted by: CC | Checked by: CC

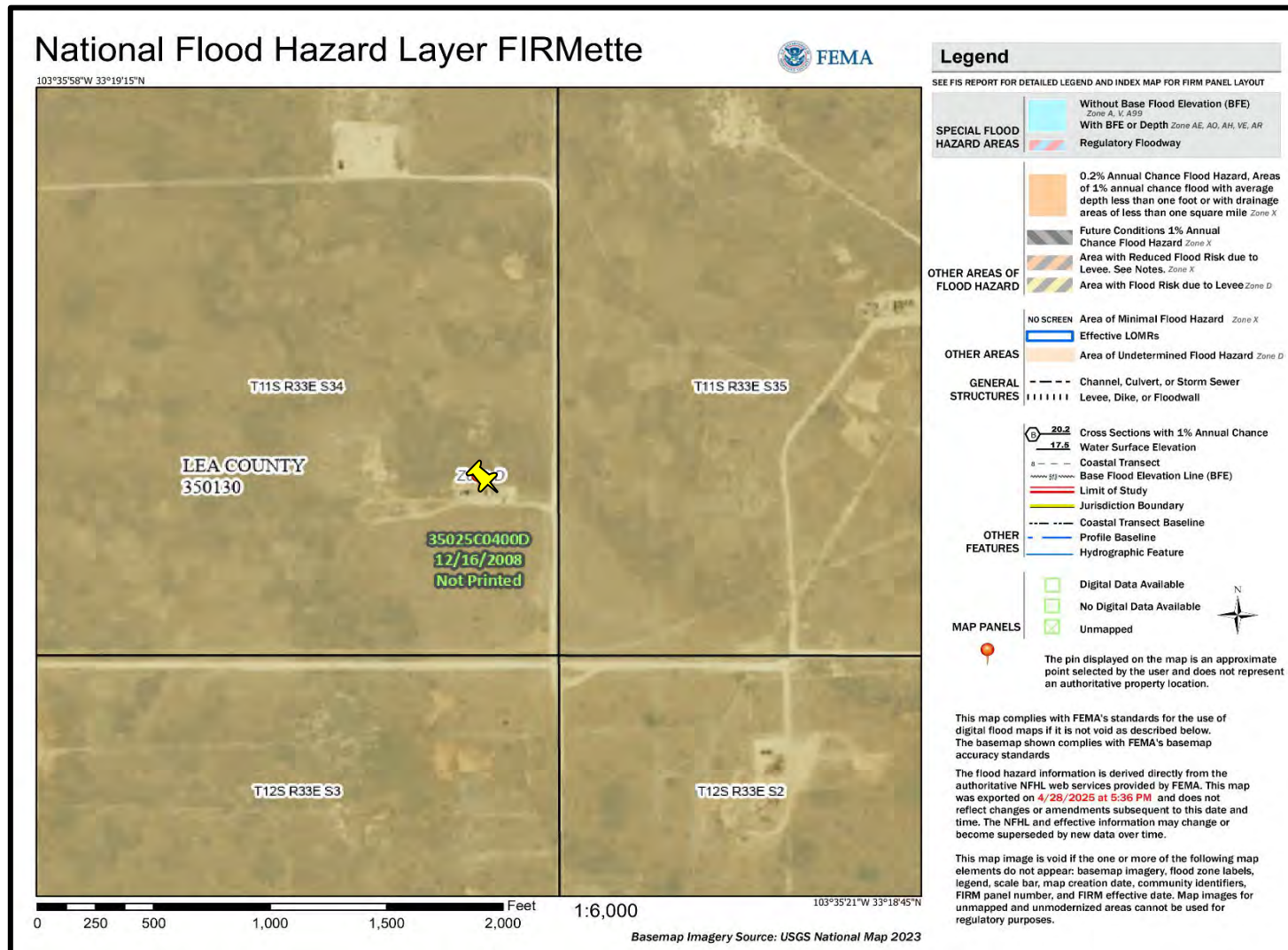
Draft: April 28, 2025

GPS: 33.316781° -103.594265°





<div>LEGEND:</div> <div> Site Location</div> <div>Base Map from USFWS</div>	<div>Figure 4</div> <div>National Wetlands Inventory Map</div> <div>BXP Operating, LLC</div> <div>State BT N #001</div> <div>Lea County, New Mexico</div>		
		Drafted by: CC Checked by: CC	
		Draft: April 28, 2025	
		GPS: 33.316781° -103.594265°	



LEGEND:



Site Location

Base Map from Google Earth and FEMA StayDry

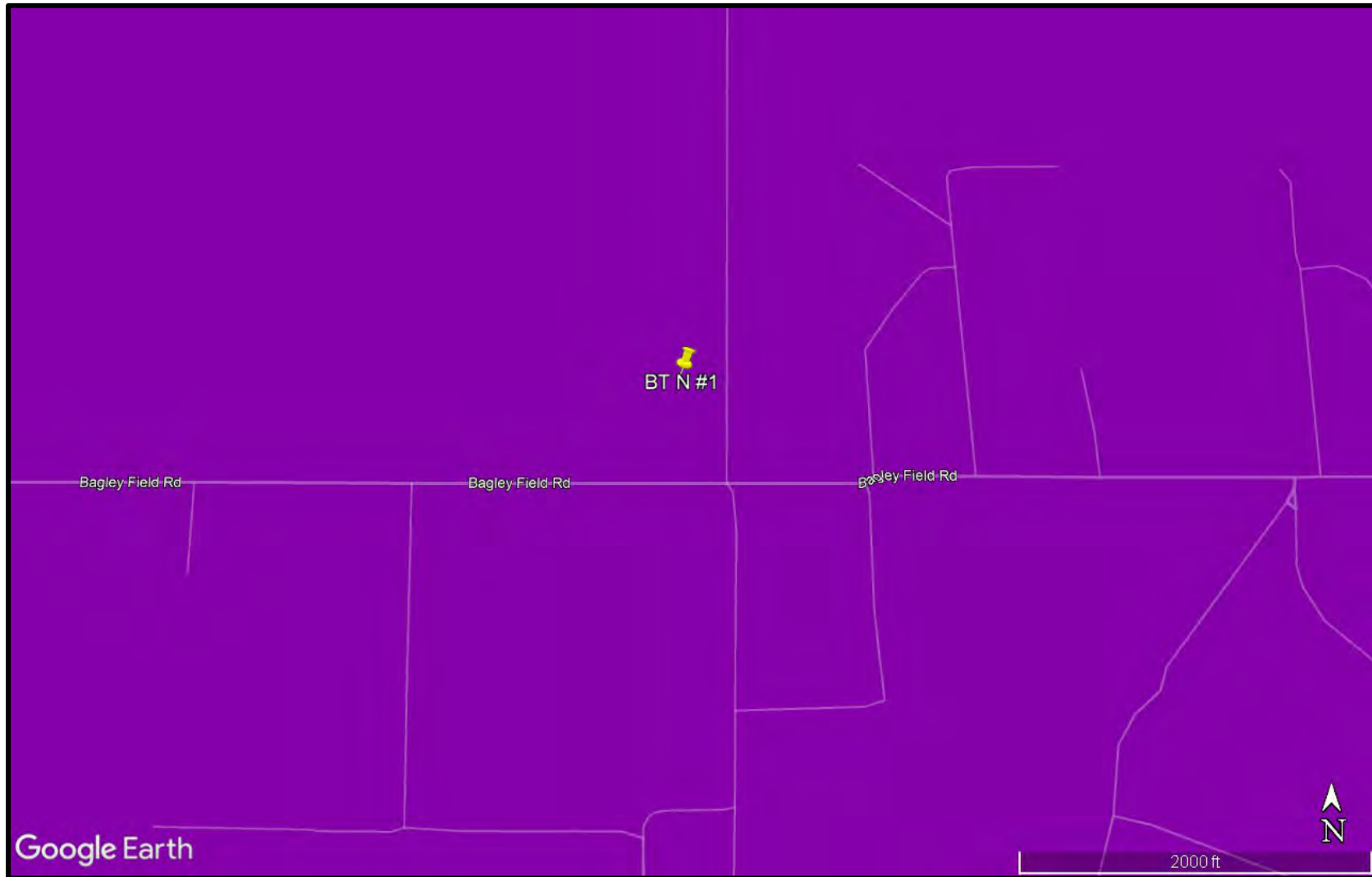
Figure 5
FEMA Floodplain Map
 BXP Operating, LLC
 State BT N #001
 Lea County, New Mexico

Drafted by: CC | Checked by: CC

Draft: April 28, 2025

GPS: 33.316781° -103.594265°





<div><div>LEGEND:</div><div><div><div></div><div>Low Karst Potential</div></div><div><div></div><div>Medium Karst Potential</div></div><div><div></div><div>High Karst Potential</div></div></div><div><div>Base Map from Google Earth Pro and BLM</div></div></div>	<div><div>Figure 6</div><div>Karst Potential Map</div><div>BXP Operating, LLC</div><div>State BT N #001</div><div>Lea County, New Mexico</div></div>	<div><div><div></div><div>Drafted by: CC Checked by: CC</div><div></div><div>Draft: April 28, 2025</div><div><div>GPS:</div><div>33.316781°</div><div>-103.594265°</div></div><div></div></div></div> <div><div><div></div><div>Crain</div><div>Environmental</div></div></div>
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Appendix A: NMOSE Water Well Logs

Point of Diversion Summary

quarters are 1=NW 2=NE 3=SW 4=SE
quarters are smallest to largest

NAD83 UTM in meters

Well Tag	POD Nbr	Q64	Q16	Q4	Sec	Tws	Rng	X	Y	Map
	L 01327		SW	SW	35	11S	33E	631143.0	3687301.0 *	

* UTM location was derived from PLSS - see Help

Driller License:	33	Driller Company:	TATUM CLAUDE E.		
Driller Name:	TATUM, CLAUDE E.				
Drill Start Date:	1951-12-17	Drill Finish Date:	1951-12-18	Plug Date:	1954-07-10
Log File Date:	1952-02-18	PCW Rcv Date:	1953-02-20	Source:	Shallow
Pump Type:		Pipe Discharge Size:		Estimated Yield:	
Casing Size:	7.00	Depth Well:	115	Depth Water:	55

Water Bearing Stratifications:


Top	Bottom	Description
55	115	Sandstone/Gravel/Conglomerate

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.

Point of Diversion Summary

quarters are 1=NW 2=NE 3=SW 4=SE
quarters are smallest to largest

NAD83 UTM in meters

Well Tag	POD Nbr	Q64	Q16	Q4	Sec	Tws	Rng	X	Y	Map
	L 01396		NE	NW	02	12S	33E	631552.0	3686905.0 *	

* UTM location was derived from PLSS - see [Help](#)

Driller License:	33	Driller Company:	TATUM CLAUDE E.		
Driller Name:	TATUM, CLAUDE E.				
Drill Start Date:	1952-03-05	Drill Finish Date:	1952-03-06	Plug Date:	1952-11-13
Log File Date:	1952-04-03	PCW Rcv Date:	1953-10-22	Source:	Shallow
Pump Type:		Pipe Discharge Size:		Estimated Yield:	
Casing Size:	6.00	Depth Well:	126	Depth Water:	45

Water Bearing Stratifications:

Top	Bottom	Description
45	126	Sandstone/Gravel/Conglomerate

Casing Perforations:


Top	Bottom
100	126

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Point of Diversion Summary

quarters are 1=NW 2=NE 3=SW 4=SE
quarters are smallest to largest

NAD83 UTM in meters

Well Tag	POD Nbr	Q64	Q16	Q4	Sec	Tws	Rng	X	Y	Map
	L 02165	SW	NW	NW	02	12S	33E	631049.0	3686799.0 *	

* UTM location was derived from PLSS - see Help

Driller License:		Driller Company:	
Driller Name:		W.H. HOWARD	
Drill Start Date:	1950-07-25	Drill Finish Date:	1950-07-26
Plug Date:			
Log File Date:	1953-06-30	PCW Rcv Date:	1953-06-30
Source:		Shallow	
Pump Type:		Pipe Discharge Size:	
Estimated Yield:			
Casing Size:		Depth Well:	114
Depth Water:			

Water Bearing Stratifications:

Top	Bottom	Description
48	113	Sandstone/Gravel/Conglomerate

Casing Perforations:

Top	Bottom
70	110

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.

Point of Diversion Summary

quarters are 1=NW 2=NE 3=SW 4=SE
quarters are smallest to largest

NAD83 UTM in meters

Well Tag	POD Nbr	Q64	Q16	Q4	Sec	Tw	Rng	X	Y	Map
	L 09545		NE	SE	34	11S	33E	630735.0	3687698.0 *	

* UTM location was derived from PLSS - see Help

Driller License:	421	Driller Company:	GLENN'S WATER WELL SERVICE		
Driller Name:	GLENN, CLARK A."CORKY" (LD)				
Drill Start Date:	1984-08-24	Drill Finish Date:	1984-08-24	Plug Date:	1984-11-06
Log File Date:	1984-09-05	PCW Rcv Date:		Source:	Shallow
Pump Type:		Pipe Discharge Size:		Estimated Yield:	25
Casing Size:	6.63	Depth Well:	154	Depth Water:	70

Water Bearing Stratifications:

Top	Bottom	Description
70	150	Other/Unknown

Casing Perforations:

Top	Bottom
125	154

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 B: Laboratory Report and Chain-of-Custody Documentation



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

February 13, 2023

MIKE HOLDER

ELITE ENVIRONMENTAL SERVICES

P.O. BOX 735

GAINSVILLE, TX 76241

RE: STATE BT - N #001

Enclosed are the results of analyses for samples received by the laboratory on 02/09/23 10:58.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. 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 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 fluid and cursive, with the first name "Celey" and last name "Keene" clearly distinguishable.

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

ELITE ENVIRONMENTAL SERVICES
 MIKE HOLDER
 P.O. BOX 735
 GAINSVILLE TX, 76241
 Fax To:

Received: 02/09/2023
 Reported: 02/13/2023
 Project Name: STATE BT - N #001
 Project Number: BXP
 Project Location: WEST OF TATUM NM

Sampling Date: 02/08/2023
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: 1A - 0" - 6" (H230601-01)

BTEX 8021B		mg/kg		Analyzed By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/10/2023	ND	2.00	100	2.00	4.37	
Toluene*	<0.050	0.050	02/10/2023	ND	2.04	102	2.00	5.01	
Ethylbenzene*	<0.050	0.050	02/10/2023	ND	2.01	101	2.00	3.54	
Total Xylenes*	<0.150	0.150	02/10/2023	ND	6.19	103	6.00	4.27	
Total BTEX	<0.300	0.300	02/10/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 112 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	80.0	16.0	02/10/2023	ND	432	108	400	3.64		

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	02/09/2023	ND	172	85.8	200	1.87	
DRO >C10-C28*	<10.0	10.0	02/09/2023	ND	171	85.7	200	0.167	
EXT DRO >C28-C36	<10.0	10.0	02/09/2023	ND					

Surrogate: 1-Chlorooctane 84.6 % 48.2-134

Surrogate: 1-Chlorooctadecane 92.1 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

ELITE ENVIRONMENTAL SERVICES
 MIKE HOLDER
 P.O. BOX 735
 GAINSVILLE TX, 76241
 Fax To:

Received: 02/09/2023
 Reported: 02/13/2023
 Project Name: STATE BT - N #001
 Project Number: BXP
 Project Location: WEST OF TATUM NM

Sampling Date: 02/08/2023
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: 2A - 0" - 6" (H230601-02)

BTEx 8021B			mg/kg							
			Analyzed By: JH/							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	02/09/2023	ND	1.89	94.3	2.00	11.0		
Toluene*	<0.050	0.050	02/09/2023	ND	1.92	96.1	2.00	13.0		
Ethylbenzene*	<0.050	0.050	02/09/2023	ND	1.90	94.9	2.00	11.0		
Total Xylenes*	<0.150	0.150	02/09/2023	ND	5.86	97.6	6.00	10.8		
Total BTEX	<0.300	0.300	02/09/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 108 % 71.5-134

Chloride, SM4500Cl-B			mg/kg							
			Analyzed By: AC							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	160	16.0	02/10/2023	ND	432	108	400	3.64		

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	02/09/2023	ND	172	85.8	200	1.87		
DRO >C10-C28*	<10.0	10.0	02/09/2023	ND	171	85.7	200	0.167		
EXT DRO >C28-C36	<10.0	10.0	02/09/2023	ND						

Surrogate: 1-Chlorooctane 82.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 90.7 % 49.1-148

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Analytical Results For:

ELITE ENVIRONMENTAL SERVICES
 MIKE HOLDER
 P.O. BOX 735
 GAINSVILLE TX, 76241
 Fax To:

Received: 02/09/2023
 Reported: 02/13/2023
 Project Name: STATE BT - N #001
 Project Number: BXP
 Project Location: WEST OF TATUM NM

Sampling Date: 02/08/2023
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: 3A - 0" - 6" (H230601-03)

BTEx 8021B			mg/kg							
			Analyzed By: JH/							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	02/09/2023	ND	1.89	94.3	2.00	11.0		
Toluene*	<0.050	0.050	02/09/2023	ND	1.92	96.1	2.00	13.0		
Ethylbenzene*	<0.050	0.050	02/09/2023	ND	1.90	94.9	2.00	11.0		
Total Xylenes*	<0.150	0.150	02/09/2023	ND	5.86	97.6	6.00	10.8		
Total BTEX	<0.300	0.300	02/09/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 112 % 71.5-134

Chloride, SM4500Cl-B			mg/kg							
			Analyzed By: AC							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	96.0	16.0	02/10/2023	ND	432	108	400	3.64		

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	02/09/2023	ND	172	85.8	200	1.87		
DRO >C10-C28*	<10.0	10.0	02/09/2023	ND	171	85.7	200	0.167		
EXT DRO >C28-C36	<10.0	10.0	02/09/2023	ND						

Surrogate: 1-Chlorooctane 93.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 104 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

ELITE ENVIRONMENTAL SERVICES
 MIKE HOLDER
 P.O. BOX 735
 GAINSVILLE TX, 76241
 Fax To:

Received: 02/09/2023
 Reported: 02/13/2023
 Project Name: STATE BT - N #001
 Project Number: BXP
 Project Location: WEST OF TATUM NM

Sampling Date: 02/08/2023
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: 4A - 0" - 6" (H230601-04)

BTEx 8021B		mg/kg		Analyzed By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/09/2023	ND	1.89	94.3	2.00	11.0	
Toluene*	<0.050	0.050	02/09/2023	ND	1.92	96.1	2.00	13.0	
Ethylbenzene*	<0.050	0.050	02/09/2023	ND	1.90	94.9	2.00	11.0	
Total Xylenes*	<0.150	0.150	02/09/2023	ND	5.86	97.6	6.00	10.8	
Total BTEX	<0.300	0.300	02/09/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 110 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	144	16.0	02/10/2023	ND	432	108	400	3.64	

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	02/10/2023	ND	172	85.8	200	1.87	
DRO >C10-C28*	<10.0	10.0	02/10/2023	ND	171	85.7	200	0.167	
EXT DRO >C28-C36	<10.0	10.0	02/10/2023	ND					

Surrogate: 1-Chlorooctane 81.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 89.5 % 49.1-148

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Notes and Definitions

- QR-03 The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to matrix interference. QC batch accepted based on LCS and/or LCSD recovery and/or RPD values.
- 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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A handwritten signature in black ink, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager



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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: Elite Environmental Services Project Manager: Mike Holder Address: P.O. Box 735 City: Gainesville State: TX Zip: 76241 Phone #: 918-746-2766 Fax #: Project #: Project Name: State BT-N #001 Project Location: West of Tatum, WNM Sample Name: Unknown Holder FOR LAB USE ONLY				BILL TO P.O. #: Company: BXP Attn: Nicole Carver Address: City: Houston State: TX Zip: Phone #: 346-207-6175 Fax #:				ANALYSIS REQUEST			
Lab I.D. H230601		Sample I.D. 1A - 0'-6" 2A - 0'-6" 3A - 0'-6" 4A - 0'-6"		(G)RAB OR (C)OMP. # CONTAINERS GROUNDWATER WASTEWATER SOIL OIL SLUDGE OTHER : ACID/BASE: ICE / COOL OTHER :		MATRIX PRESERV. SAMPLING		DATE TIME		BTEX - 8031 B TPH - 8015 mod Chlorides - max 4500	
Delivered By: (Circle One) Sampler - UPS - Bus - Other:		Observed Temp. °C 36 Corrected Temp. °C 3.0		Sample Condition Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		CHECKED BY: (Initials) V-0		Turnaround Time: Standard <input checked="" type="checkbox"/> Rush <input type="checkbox"/> Bacteria (only) <input checked="" type="checkbox"/> Sample Condition <input checked="" type="checkbox"/> Cool Intact <input checked="" type="checkbox"/> Observed Temp. °C Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Corrected Temp. °C		REMARKS: Verbal Result: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Add'l Phone #: All Results are emailed. Please provide Email address: mholder@eliteenv.com Cindy Capen	
Relinquished By: Date: 8-9-23 Time: 10:58 Received By:		Delivered By: (Circle One) Sampler - UPS - Bus - Other:		Observed Temp. °C 36 Corrected Temp. °C 3.0		Sample Condition Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		CHECKED BY: (Initials) V-0		Turnaround Time: Standard <input checked="" type="checkbox"/> Rush <input type="checkbox"/> Bacteria (only) <input checked="" type="checkbox"/> Sample Condition <input checked="" type="checkbox"/> Cool Intact <input checked="" type="checkbox"/> Observed Temp. °C Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Corrected Temp. °C	



Appendix C: Photographic Documentation

Appendix B
BXP Operating, LLC
State BT N #001



View of well sign (9/2/21).



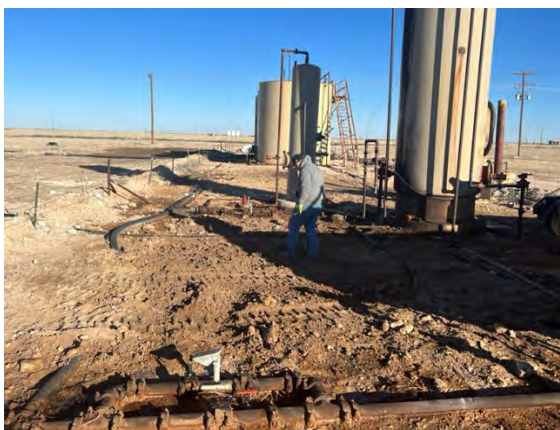
View of barren areas N and E of Tank Battery (9/2/21).



Soil staining around equipment (9/2/21).



View to W of area N and E of TB following treatment (2/8/23).



View of area around equipment following treatment (2/8/23).



View to E of area N and E of TB following treatment (2/8/23).



Appendix D: NMSLO Cultural Resources Cover Sheet



Stephanie Garcia Richard, Commissioner of Public Lands
State of New Mexico

NMSLO Cultural Resources Cover Sheet Exhibit

NMCRIS Activity Number:

(if applicable)

Exhibit Type (select one)

ARMS Inspection/Review - Summarize the results (select one):

- (A) The entire area of potential effect or project area has been previously surveyed to current standards and **no cultural properties** were found within the survey area.
- (B) The entire area of potential effect or project area has been previously surveyed to current standards and **cultural properties were found** within the survey area.
- (C) The entire area of potential effect or project area has **not** been previously surveyed or **has not been surveyed** to current standards. A complete archaeological survey will be conducted and submitted for review.

Archaeological Survey

Findings:

Negative - No further archaeological review is required.

Positive - Have avoidance and protection measures been devised? Select one:

Comments:

Project Details:

NMSLO Lease Number (if available):

Cultural Resources Consultant:

Project Proponent (Applicant):

Project Title/Description:

Project Location:

County(ies):

PLSS/Section/Township/Range):

For NMSLO Agency Use Only:

NMSLO Lease Number:

Acknowledgment-Only:

Lease Analyst:

Date Exhibit Routed to Cultural Resources Office:

No person may alter the wording of the questions or layout of the cover sheet. The completion of this cover sheet by itself does not authorize anyone to engage in new surface disturbing activity before the review and approvals required by the Cultural Properties Protections Rule.

Form Revised 12 22



Appendix E: Biological Desktop Review

Project code: 2025-0089256

04/28/2025 19:26:43 UTC

PROJECT SUMMARY

Project Code: 2025-0089256

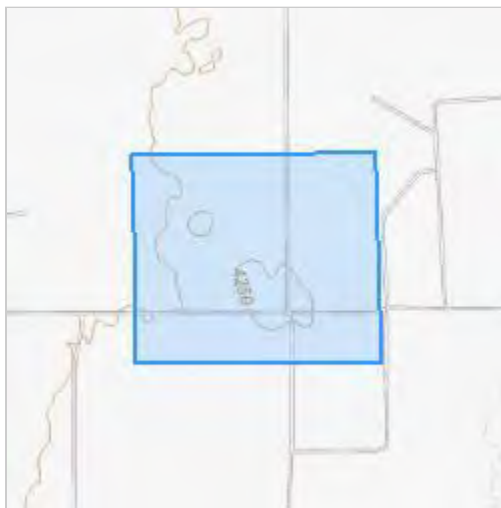
Project Name: State BT N #001

Project Type: General NRDAR/Spill Response/Environmental Contaminants

Project Description: Soil remediation

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@33.317367950000005,-103.5944221019289,14z>



Counties: Lea County, New Mexico

Project code: 2025-0089256

04/28/2025 19:26:43 UTC

BIRDS

NAME	STATUS
Lesser Prairie-chicken <i>Tympanuchus pallidicinctus</i> Population: Southern DPS No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1924	Endangered
Northern Aplomado Falcon <i>Falco femoralis septentrionalis</i> Population: U.S.A (AZ, NM) No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1923	Experimental Population, Non- Essential

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS

Action 456436

QUESTIONS

Operator: BXP Operating, LLC 11757 KATY FREEWAY HOUSTON, TX 77079	OGRID: 329487
	Action Number: 456436
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2427382332
Incident Name	NAPP2427382332 STATE BT N #001 @ 30-025-01012
Incident Type	Produced Water Release
Incident Status	Remediation Plan Received
Incident Well	[30-025-01012] STATE BT N #001

Location of Release Source	
<i>Please answer all the questions in this group.</i>	
Site Name	State BT N #001
Date Release Discovered	02/08/2023
Surface Owner	State

Incident Details	
<i>Please answer all the questions in this group.</i>	
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	
<i>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.</i>	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Corrosion Pipeline (Any) Produced Water Released: 18 BBL Recovered: 0 BBL Lost: 18 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	No
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)	The barren area of this release was investigated upon request from the State Land Office. The Incident Date is reported as the date of initial sample collection, and the volume is calculated by surface dimensions of the area. This is a historical release.

Sante Fe Main Office
Phone: (505) 476-3441

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

QUESTIONS, Page 2

Action 456436

QUESTIONS (continued)

Operator: BXP Operating, LLC 11757 KATY FREEWAY HOUSTON, TX 77079	OGRID: 329487
	Action Number: 456436
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

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	<i>Unavailable.</i>
<i>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.</i>	

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	<i>Not answered.</i>

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: Dillon Salas Title: Operations Engineer Email: aggie@penrocoil.com Date: 04/28/2025
--	--

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS, Page 3

Action 456436

QUESTIONS (continued)

Operator: BXP Operating, LLC 11757 KATY FREEWAY HOUSTON, TX 77079	OGRID: 329487
	Action Number: 456436
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Site Characterization	
<i>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.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 26 and 50 (ft.)
What method was used to determine the depth to ground water	Direct Measurement
Did this release impact groundwater or surface water	No
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	Greater than 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between ½ and 1 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between ½ and 1 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Between ½ and 1 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	Yes

Remediation Plan	
<i>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.</i>	
Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No
Soil Contamination Sampling: (Provide the highest observable value for each, in milligrams per kilograms.)	
Chloride (EPA 300.0 or SM4500 Cl B)	160
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	0
GRO+DRO (EPA SW-846 Method 8015M)	0
BTEX (EPA SW-846 Method 8021B or 8260B)	0
Benzene (EPA SW-846 Method 8021B or 8260B)	0
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	06/02/2025
On what date will (or did) the final sampling or liner inspection occur	06/09/2025
On what date will (or was) the remediation complete(d)	06/20/2025
What is the estimated surface area (in square feet) that will be reclaimed	2180
What is the estimated volume (in cubic yards) that will be reclaimed	162
What is the estimated surface area (in square feet) that will be remediated	2180
What is the estimated volume (in cubic yards) that will be remediated	162
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>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.</i>	

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS, Page 4

Action 456436

QUESTIONS (continued)

Operator: BXP Operating, LLC 11757 KATY FREEWAY HOUSTON, TX 77079	OGRID: 329487
	Action Number: 456436
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Remediation Plan (continued)	
<i>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.</i>	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
<i>(Select all answers below that apply.)</i>	
(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc.)	<i>Not answered.</i>
(Ex Situ) Excavation and on-site remediation (i.e. On-Site Land Farms)	<i>Not answered.</i>
(In Situ) Soil Vapor Extraction	<i>Not answered.</i>
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	Yes
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	<i>Not answered.</i>
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	<i>Not answered.</i>
Ground Water Abatement pursuant to 19.15.30 NMAC	<i>Not answered.</i>
OTHER (Non-listed remedial process)	<i>Not answered.</i>
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
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: Dillon Salas Title: Operations Engineer Email: aggie@penrocoil.com Date: 04/28/2025
<i>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.</i>	

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QUESTIONS, Page 5

Action 456436

QUESTIONS (continued)

Operator: BXP Operating, LLC 11757 KATY FREEWAY HOUSTON, TX 77079	OGRID: 329487
	Action Number: 456436
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Deferral Requests Only	
Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

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QUESTIONS, Page 6

Action 456436

QUESTIONS (continued)

Operator: BXP Operating, LLC 11757 KATY FREEWAY HOUSTON, TX 77079	OGRID: 329487
	Action Number: 456436
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	{Unavailable.}

Remediation Closure Request	
Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.	
Requesting a remediation closure approval with this submission	No

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Santa Fe, NM 87505

CONDITIONS

Action 456436

CONDITIONS

Operator: BXP Operating, LLC 11757 KATY FREEWAY HOUSTON, TX 77079	OGRID: 329487
	Action Number: 456436
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	The remediation plan is conditionally approved. Chemically treated soil is not approved for use on this or any NM site. All previously treated soil must be properly disposed at an OCD approved facility. Include disposal manifests in next report. All samples must be analyzed for all constituents listed in Table I of 19.15.29.12 NMAC. Floor confirmation samples should be delineated/excavated to meet closure criteria standards for site assessment/characterization/proven depth to water determination. Sidewall samples should be delineated/excavated to 600 mg/kg for chlorides and 100 mg/kg for TPH to define the edge of the release. Confirmation samples should be collected every 200 ft ² . All off pad areas must meet reclamation standards set forth in the OCD Spill Rule. The work will need to occur in 90 days after the work plan has been reviewed.	6/27/2025