

Released Volume Calculation

Length 50 feet

Width 50 feet

Thickness 0.55 in

1,375 gal = 33 Est. Total Bbls Released

Volume = $L \times W \times T$

Total Released Volume = 1,375 gallons (US, dry)

33 Bbls



Revised Liner Inspection Report and Closure Request

August 8, 2025

**Hale State #001
(Hale State Battery)
API 30-025-02154
Produced Water Release
Incident No. nTO1427352689
Lea County, New Mexico**

Prepared For:

BXP Operating, LLC
11757 Katy Freeway, Suite 475
Houston, Texas 77079

Prepared By:

Crain Environmental
2925 East 17th Street
Odessa, Texas 79761

A handwritten signature in blue ink that reads 'Cynthia K. Crain'.

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 Revised Liner Inspection Report and Closure Request for the produced water release at Hale State Battery (Site). The Site is located in Unit Letter E, Section 31, Township 17 South, Range 34 East, Lea County, New Mexico, at Global Positioning Coordinates (GPS) 32.793671, -103.606855 and is approximately 530 feet north of the Hale State #001 well. The property surface rights are owned by the State of New Mexico.

The Hale State Battery is located approximately 18 miles southwest of Lovington, New Mexico, in an area of oil and gas activity. The Site can be accessed by traveling west from Hobbs, New Mexico on Highway 62/180 for approximately 12 miles to Highway 529. Continue west and northwest on Highway 529 for 14.5 miles to Querecho Road. Turn north and continue 2.87 miles to a lease road. Turn west for 0.35 mi to the Hale State Battery on the north side of the road. There are no locked gates or other access issues. The attached Figure 1 shows the well location.

2.0 Background

While being operated by Linn Operating, LLC (Linn), On September 23, 2014, a release was discovered at the heater treater of the Hale State Battery on September 23, 2014. On September 30, 2014, Linn submitted a Release Notification and Corrective Action Form (C-141) to the New Mexico Oil Conservation Division (NMOCD), and Incident #1RP-3362 (nTO1427352689) was assigned. The initial C-141 states that 33 barrels (bbls) of produced water was released from the heater treater into the lined containment area (approximately 50' x 50'), and 33 bbls of produced water were recovered by vacuum truck. The attached Figure 2 provides a Site map. A copy of the initial C-141 is provided in Appendix A.

A *Liner Inspection Report and Closure Request* was submitted to the NMOCD on June 3, 2025, and was rejected on June 9, 2025, for the following reasons:

- A liner inspection must demonstrate liner integrity with all affected material removed, exposing the full liner to confirm the integrity is intact. The photos provided in Appendix C do not clearly display the bottom of the liner. This requires removal of all debris, sand, mud or gravel with pictures clearly showing the bottom of the liner from all sides.
- Please resubmit the full exposure and demonstrate integrity of the liner within 60 days from 06/09/2025, making the new due date 08/08/2025.

This Revised Liner Inspection Report and Closure Request has been prepared in accordance with 19.15.29.11.5a New Mexico Administrative Code (NMAC), and is being submitted on August 8, 2025.

3.0 NMOCD Closure Criteria

Cleanup standards for produced water 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

According to the New Mexico Office of the State Engineer (NMOSE) records, depth to groundwater at the Site is greater than 100 feet below ground surface (bgs). Figure 3 provides a 0.5-mile radius around the Site and shows the locations of the NMOSE water wells. NMOSE Point of Diversion Summaries with depth to groundwater listed are provided in Appendix B.

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 maps (Figures 3 and 4).
- Within 200 feet of any lakebed, sinkhole or playa lake (measured from the ordinary highwater mark).
 - The aerial maps (Figures 3 and 4) indicate there is not a lakebed, sinkhole or playa lake located within 200 feet of the Site. Freshwater emergent wetlands are located approximately 0.4 miles east and northeast 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 Currently Assumed Applicable to the Site

According to the New Mexico Office of the State Engineer (NMOSE) records, depth to groundwater at the Site is greater than 100 feet below ground surface (bgs). Figure 3 provides a 0.5-mile radius around the Site and shows the locations of the NMOSE water wells. NMOSE Point of Diversion Summaries with depth to groundwater listed are provided in Appendix B.

At depths greater than 4' bgs, the Closure Criteria applicable to the Site will be based on estimated depth to groundwater, which dictates the least stringent Closure Criteria typically associated with groundwater depths greater than 100 feet bgs. From the surface to a depth of 4' bgs, the most stringent Closure Criteria will apply. A summary of the Closure Criteria is provided in the table below.

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
GRO + DRO + MRO		100	2,500	2,500



TPH (EPA 8015M)	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 Liner Inspection Activities

On April 27, 2025, a liner inspection notification was submitted to the NMOCD for the inspection on May 6, 2025. In compliance with NMAC 19.15.29.11.5a, the liner at the Hale State Battery heater treater containment was visually inspected and found to be intact, with no signs of tearing or deterioration. Photographic documentation is provided in Appendix C.

As the Battery is located in a previously disturbed area, compliance with the Cultural Properties Protection (CPP) rule does not apply. A biological desktop review was conducted, and no critical habitats were found in proximity to the subject Site. A copy of the U.S. Fish & Wildlife Service database review is included as Appendix D.

Following NMOCD rejection of the initial Liner Inspection Report and Closure Request, all pea gravel was removed from the containment area. On July 22, 2025, a liner inspection notification was submitted to the NMOCD for the inspection of July 24, 2025. In compliance with NMAC 19.15.29.11.5a, the liner at the Hale State Battery heater treater containment was visually inspected and found to be intact, with no signs of tearing or deterioration. Photographic documentation is provided in Appendix C.

5.0 Closure Request

Given the complete recovery of the released fluids and the absence of any evidence indicating a potential release from the containment, BXP respectfully requests closure of Incident #nTO1427352689.

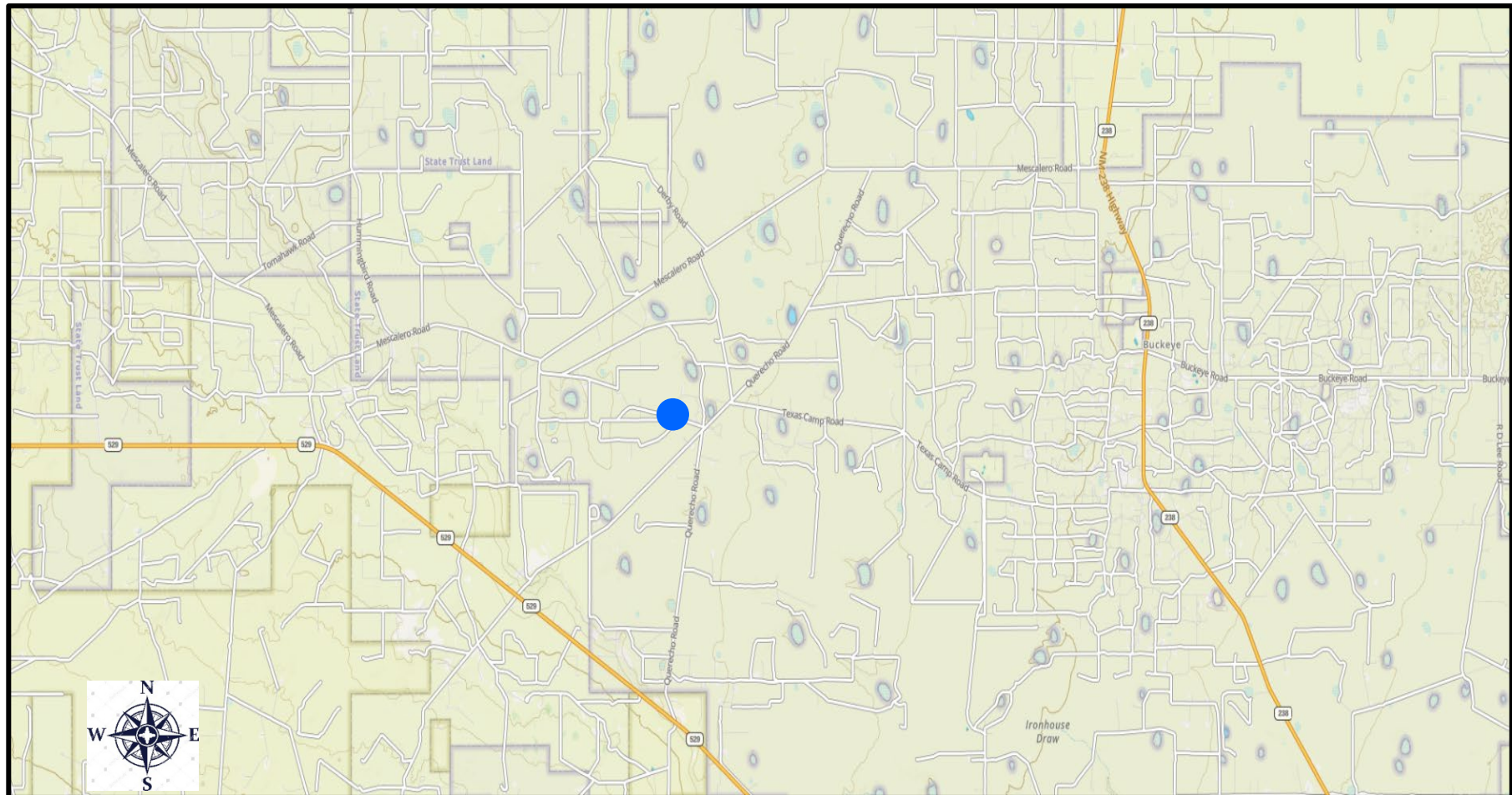
6.0 Distribution


Copy 1: Mike Bratcher
 New Mexico Energy, Minerals, and Natural Resources Department
 Oil Conservation Division, District 2
 811 S. First Street
 Artesia, New Mexico 88210

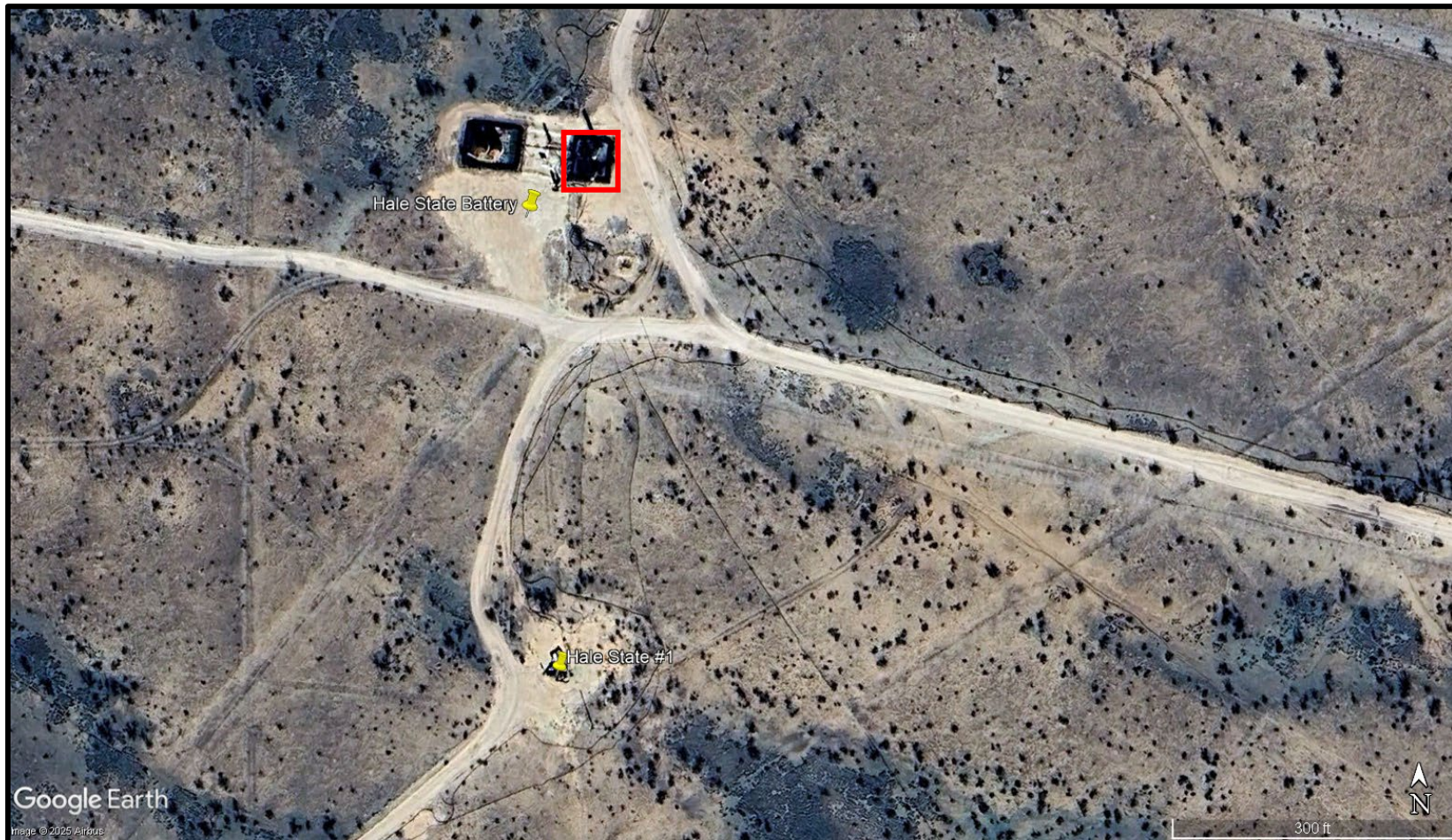
Copy 2: Environmental Compliance Office
 ECO@nmslo.gov





Figures



LEGEND: ● Site Location Base Map from GAIA GPS	Figure 1 Site Location Map BXP Operating, LLC Hale State Battery Lea County, New Mexico		
		Drafted by: CC Checked by: CC	
		Draft: June 2, 2025	
		GPS: 32.793671° -103.606855°	

**LEGEND:**

-  Site Location
-  Heater Treater Containment

Base Map from Google Earth Pro

Figure 2

Site Map
BXP Operating, LLC
Hale State Battery
Lea County, New Mexico




Drafted by: CC | Checked by: CC

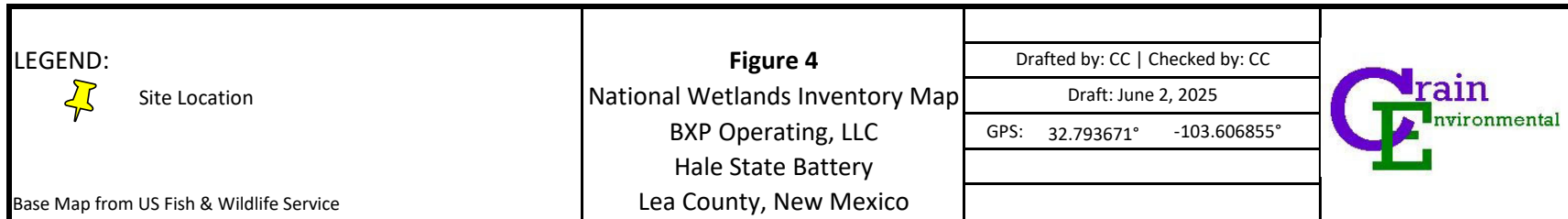
Draft: June 2, 2025

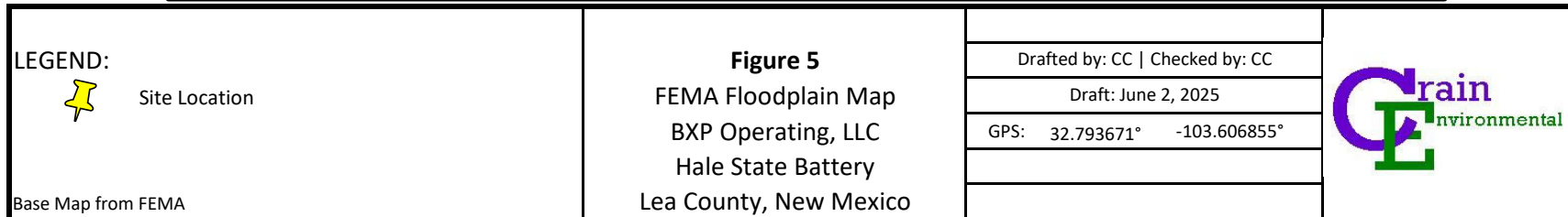
GPS: 32.793671° -103.606855°

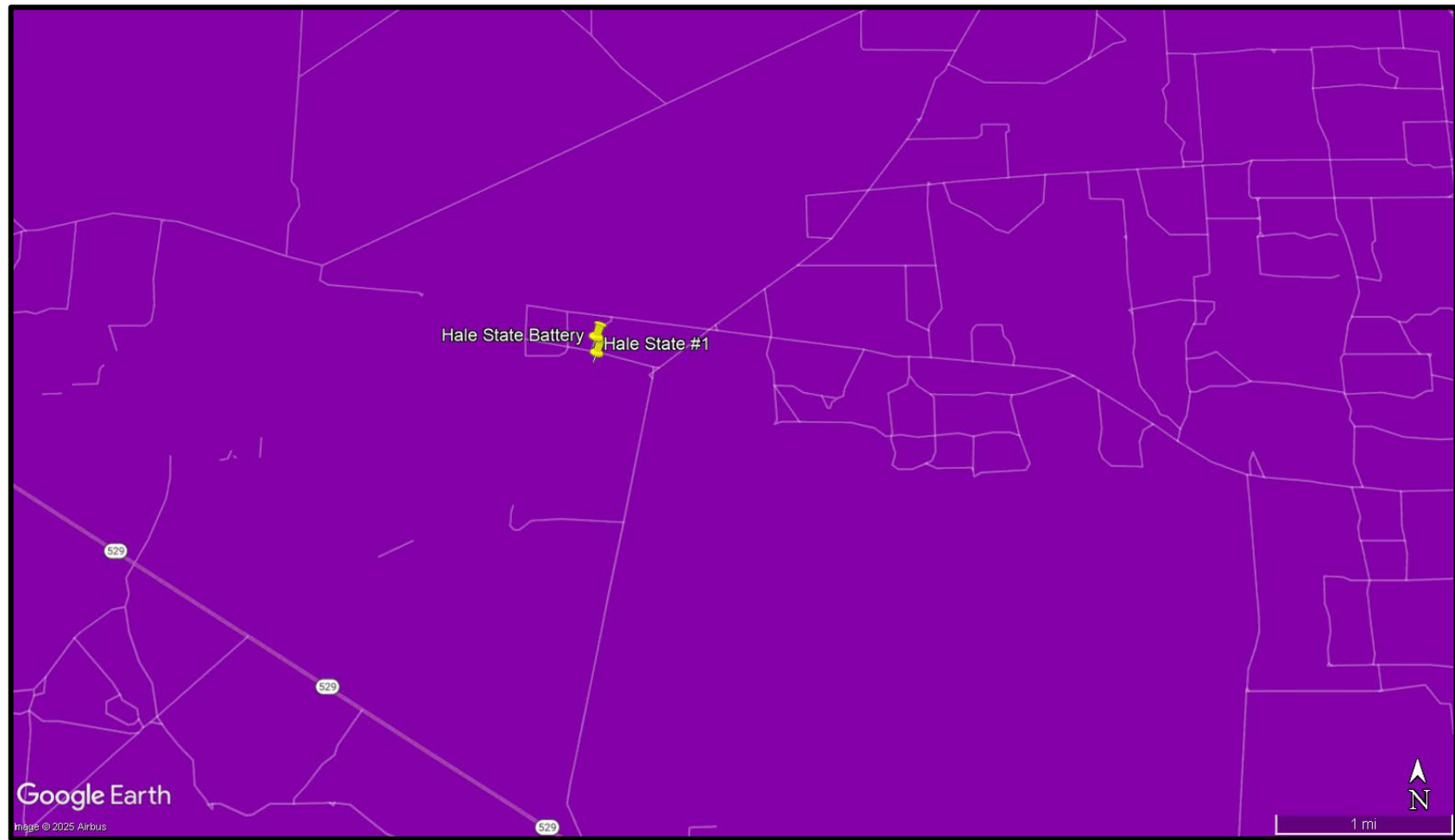





LEGEND:  Site and Water Well Locations  0.5-Mile Radius Base Map from Google Earth Pro	Figure 3 Wellhead Protection Area Map BXP Operating, LLC Hale State Battery Lea County, New Mexico		
		Drafted by: CC Checked by: CC	
		Draft: June 2, 2025	
		GPS: 32.793671° -103.606855°	







LEGEND: <div><div>Low Karst Potential</div><div>Medium Karst Potential</div><div>High Karst Potential</div></div> Base Map from Google Earth Pro and BLM	Figure 6 Karst Potential Map BXP Operating, LLC Hale State Battery Lea County, New Mexico		
		Drafted by: CC Checked by: CC	
		Draft: June 2, 2025	
		GPS: 32.793671° -103.606855°	



Appendix A: Initial C-141

HOBBS OCD

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

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

SEP 30 2014

Form C-141
Revised August 8, 2011

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

RECEIVED

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company	Linn Operating Inc.	Contact	Brian Wall
Address	2130 W Bender Blvd Hobbs, NM 88240	Telephone No.	575-738-1739
Facility Name	Hale State Battery closest well (Hale State # 1)	Facility Type	Battery
Surface Owner	State	Mineral Owner	
		API No.(closest well)	30-025-02154

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
E	31	17S	34E	990	North	660	West	Lea

Latitude 32.795795315483 Longitude -103.605900841618

NATURE OF RELEASE

Type of Release	Oil / Produced Water	Volume of Release	16 bbls / 17 bbls	Volume Recovered	16bbls / 17 bbls
Source of Release	heater (fire tube)	Date and Hour of Occurrence	09/23/2014	Date and Hour of Discovery	09/23/2014 8:30am
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Jeff Robertson- BLM Thomas Oberding - NM OCD		
By Whom?	Brian Wall	Date and Hour	09/25/2014 0700		
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.			
If a Watercourse was Impacted, Describe Fully.*					
Describe Cause of Problem and Remedial Action Taken.* While pumping the route I drove up to Hale St Battery and noticed a Heater leak. Upon further investigation fluid was coming out of Heater (fire tube) due to possible failure in equipment Directions to site: West on 162/180 go to 529. Straight on 529, turn right on 125. Go down 2.5 miles to curve and take caliche road to left go .6 miles to battery on the right.					
Describe Area Affected and Cleanup Action Taken.* Affected area 30L x 50W liner containment unit. vacuum up all fluids out of containment and sprayed down containment unit					
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.					

OIL CONSERVATION DIVISION

Signature:

Printed Name: Brian Wall

Title: Construction Foreman II

E-mail Address: bwall@linnenergy.com

Date: 09/30/2014

Phone: 806-367-0645

Approved by Environmental Specialist:

Approval Date: 9-30-14

Expiration Date: 11-30-14

Conditions of Approval:

Site specific report
Delivered & complete area
upon NMOCD guidance.
Submit final C-141 by
11-30-14

Attached ☐

1RP-3362

* Attach Additional Sheets If Necessary

09/14 269324

11/14 27 352689

11/14 27 352845

SEP 30 2014




Appendix B: NMOSE Water Well Records

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 02687		NE	NE	36	17S	33E	630137.0	3629598.0 *	


* UTM location was derived from PLSS - see Help

Driller License:	134	Driller Company:	STONE DRILLING CO.		
Driller Name:					
Drill Start Date:	1954-11-30	Drill Finish Date:	1954-11-30	Plug Date:	1956-11-23
Log File Date:	1955-11-10	PCW Rcv Date:	1955-11-10	Source:	Shallow
Pump Type:		Pipe Discharge Size:		Estimated Yield:	
Casing Size:	7.00	Depth Well:		Depth Water:	

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 01695	POD2	SW	SW	NW	30	17S	34E	630346.5	3630669.3	

* UTM location was derived from PLSS - see Help

Driller License:	1509	Driller Company:	BMS DRILLING COMPANY
Driller Name:	JOE ROYBAL		
Drill Start Date:	2013-08-10	Drill Finish Date:	2013-08-23
Log File Date:	2013-12-23	PCW Rcv Date:	
Pump Type:		Pipe Discharge Size:	
Casing Size:	12.00	Depth Well:	240
		Depth Water:	156

Meter Information

Meter Number:	19968	Meter Make:	FOXBORO
Meter Serial Number:	19371230	Meter Multiplier:	1.0000
Number of Dials:	9	Meter Type:	Diversion
Unit of Measure:	Gallons	Reading Frequency:	Monthly

Meter Readings (in Acre-Feet)

Read Date	Year	Mtr Reading	Flag	Rdr	Comment	Mtr Amount	Online
2019-03-31	2019	0.000	A	dd		0.000	
2019-12-31	2019	552790.000	A	dd		1.696	
2020-10-01	2020	22409000.000	A	dd		67.074	
2020-12-31	2020	31351000.000	A	dd		27.442	
2021-03-31	2021	42342000.000	A	dd		33.730	
2021-07-01	2021	52836000.000	A	dd		32.205	
2021-10-01	2021	60971000.000	A	dd		24.965	
2021-12-31	2021	72429000.000	A	dd		35.163	
2022-03-31	2022	84448000.000	A	dd		36.885	

Read Date	Year	Mtr Reading	Flag	Rdr	Comment	Mtr Amount	Online
2022-06-01	2022	89693000.000	A	dd		16.096	
2022-07-01	2022	89693000.000	A	dd		0.000	
2022-09-29	2022	95744000.000	A	dd		18.570	
2022-12-31	2022	103814000.000	A	dd		24.766	

YTD Meter Amounts:

Year	Amount
2019	1.696
2020	94.516
2021	126.063
2022	96.317

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 C: Photographic Documentation

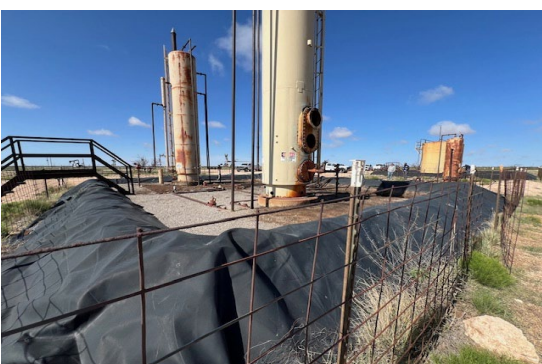
APPENDIX C
PHOTOGRAPHIC DOCUMENTATION
HALE STATE BATTERY



View of Battery sign (5/6/25).



View to SE of Battery containment (5/6/25).



View to SW of Battery containment (5/6/25).



View to NW of Battery containment (5/6/25).



View to NE of Battery containment (5/6/25).



View to N of E side of containment (7/24/25).



View to N of W side of containment (7/24/25).



View to E of S side of containment (7/24/25).

APPENDIX C
PHOTOGRAPHIC DOCUMENTATION
HALE STATE BATTERY



View to S of W side of containment (7/24/25).



View to W of N side of containment (7/24/25).



View to W of containment (7/24/25).



View of S side of containment (7/24/25).



View of central portion of containment (7/24/25).



View of N portion of containment (7/24/25).



View of N portion of containment (7/24/25).



View of S portion of containment (7/24/25).



Appendix D - Biological Desktop Review

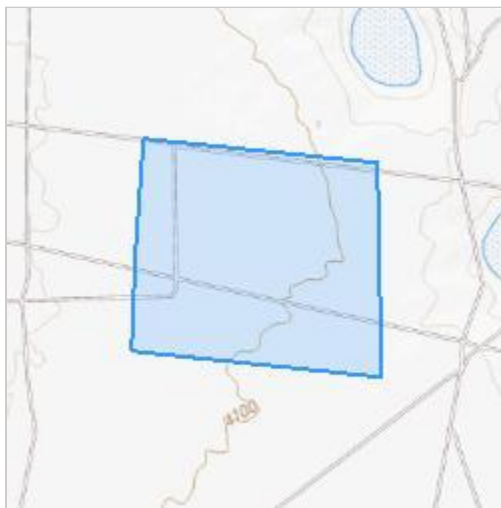
Project code: 2025-0104464

06/03/2025 03:06:50 UTC

PROJECT SUMMARY

Project Code: 2025-0104464
Project Name: Hale State Battery
Project Type: Non-NPL Site Remediation
Project Description: Release in lined containment area
Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@32.792902549999994,-103.6070838822256,14z>



Counties: Lea County, New Mexico

Project code: 2025-0104464

06/03/2025 03:06:50 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 496323

QUESTIONS

Operator: BXP Operating, LLC 11757 KATY FREEWAY HOUSTON, TX 77079	OGRID: 329487
	Action Number: 496323
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nTO1427352689
Incident Name	NT01427352689 HALE STATE #001 @ 30-025-02154
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Well	[30-025-02154] HALE STATE #001

Location of Release Source

Please answer all the questions in this group.

Site Name	HALE STATE #001
Date Release Discovered	09/23/2014
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 Separator Produced Water Released: 33 BBL Recovered: 33 BBL Lost: 0 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)	Not answered.

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 2

Action 496323

QUESTIONS (continued)

Operator: BXP Operating, LLC 11757 KATY FREEWAY HOUSTON, TX 77079	OGRID: 329487
	Action Number: 496323
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

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	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
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: Bianca Guerrero Title: Regulatory manager Email: bguerrero@bxpltd.com Date: 08/15/2025
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Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
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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 3

Action 496323

QUESTIONS (continued)

Operator: BXP Operating, LLC 11757 KATY FREEWAY HOUSTON, TX 77079	OGRID: 329487
	Action Number: 496323
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

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 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
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 1000 (ft.) and ½ (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Greater than 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 1000 (ft.) and ½ (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 1000 (ft.) and ½ (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

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	Yes
<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	07/14/2025
On what date will (or did) the final sampling or liner inspection occur	07/24/2025
On what date will (or was) the remediation complete(d)	07/18/2025
What is the estimated surface area (in square feet) that will be remediated	0
What is the estimated volume (in cubic yards) that will be remediated	0
<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>	

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QUESTIONS, Page 4

Action 496323

QUESTIONS (continued)

Operator: BXP Operating, LLC 11757 KATY FREEWAY HOUSTON, TX 77079	OGRID: 329487
	Action Number: 496323
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

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>	
Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	No
OTHER (Non-listed remedial process)	No
<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: Bianca Guerrero Title: Regulatory manager Email: bguerrero@bxpltd.com Date: 08/15/2025
<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 6

Action 496323

QUESTIONS (continued)

Operator: BXP Operating, LLC 11757 KATY FREEWAY HOUSTON, TX 77079	OGRID: 329487
	Action Number: 496323
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	487735
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	07/24/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	2250

Remediation Closure Request	
<i>Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.</i>	
Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	0
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	All pea gravel was removed from the containment so that the integrity of the liner could be inspected. Soil samples were not collected, as the liner was intact.
<i>The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (in .pdf format) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.</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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.	
I hereby agree and sign off to the above statement	Name: Bianca Guerrero Title: Regulatory manager Email: bguerrero@bxp ltd.com Date: 08/15/2025

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CONDITIONS

Action 496323

CONDITIONS

Operator: BXP Operating, LLC 11757 KATY FREEWAY HOUSTON, TX 77079	OGRID: 329487
	Action Number: 496323
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
michael.buchanan	The liner inspection and remediation closure report is approved.	8/19/2025