SITE REMEDIATION AND CLOSURE REPORT

REPORTABLE RELEASE

Strata Production Company

Forty Niner Ridge Unit #13 GPS: Latitude 32.31320 Longitude -103.86937 Eddy County, NM Incident ID No. NAPP2116666048

Prepared by:



Pima Environmental Services, LLC 1601 N. Turner Ste 500 Hobbs, NM 88240 575-964-7740

General Information

This report was prepared by Pima Environmental Services, LLC in response to the release for Strata Production Company at the Forty Niner Ridge Unit #13.

Site Coordinates: Latitude 32.31320 Longitude -103.86937

API #: 30-015-38562

Release Description and Assessment

The New Mexico Oil Conservation Division (NMOCD) conducted an on-site inspection on May 5, 2021. Upon the inspection found areas where obvious releases had occurred. Strata indicated that they were minor non-recordable releases. Strata has retained Pima Environmental to work with the NMOCD to get this NOR closed out by getting the stained areas cleaned up.

Date of Spill: 05/15/2021

Type of Spill: \square Crude Oil \square Produced Water \square Condensate \square Other (Specify):

Comments: Non-Reportable release

Remediation Activity Summary

Pima mobilized personnel and equipment to the site. Remediation activities were completed via in-situ bioremediation utilizing our Remediate Ground. Our chemicals were applied with our applicator trailer and utilizing hand tillers the chemicals were worked into the soil. The Remediate Ground encapsulates the hydrocarbons rendering them non-toxic and non-detectable under sampling events. In most cases it removes the staining from the soil. Before and after photos can be found in Appendix C.

Closure Request

After careful review, Pima requests that this NOR be closed. Strata Production Company has complied with the applicable closure requirements.

Should you have any questions or need additional information, please feel free to contact Chris Jones at 575-964-7740

or chris@pimaoil.com.

Respectfully,

Chris Jones Environmental Professional Pima Environmental Services, LLC

Appendix A- C-141 Appendix B- Site Map Appendix C- Photographic Documentation



Appendix A

C-141

District I 1625 N. French Dr., Hobbs, NM 88240 District II 811 S. First St., Artesia, NM 88210 District III 1000 Rio Brazos Road, Aztec, NM 87410 District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505 State of New Mexico Energy Minerals and Natural Resources Department

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Form C-141 Revised August 24, 2018 Submit to appropriate OCD District office

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Page 4 of 14

Incident ID	NAPP2116666048
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party: Strata Production Company	OGRID: 21712
Contact Name: Matt Murphy	Contact Telephone: 720-468-3646
Contact email: matt@stratanm.com	Incident # (assigned by OCD)
Contact mailing address: PO Box 1030, Roswell, NM 88202	

Location of Release Source

Latitude <u>32.31320</u>

Longitude <u>-103.86937</u>

(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Forty Niner Ridge Unit #13	Site Type:
Date Release Discovered:	API# (<i>if applicable</i>) 30-015-38562

Unit Letter	Section	Township	Range	County
Ν	15	23S	30E	Eddy

Surface Owner: State Federal Tribal Private (Name: _

Nature and Volume of Release

Material	(s) Released (Select all that apply and attach calculations or specific	justification for the volumes provided below)	
Crude Oil	Volume Released (bbls) De minimis	Volume Recovered (bbls) 0	
Produced Water	Volume Released (bbls) De minimis	Volume Recovered (bbls) 0	
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	Yes No	
Condensate	Volume Released (bbls)	Volume Recovered (bbls)	
Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)	
Other (describe) Volume/Weight Released (provide units)		Volume/Weight Recovered (provide units)	
Cause of Release :			

	Page 5 of	14
Incident ID	NAPP2116666048	
District RP		
Facility ID		
Application ID		

Was this a major release as defined by 19.15.29.7(A) NMAC?	If YES, for what reason(s) does the responsible party consider this a major release?
🗌 Yes 🖾 No	
If YES, was immediate no N/A	otice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

 \square The source of the release has been stopped.

The impacted area has been secured to protect human health and the environment.

Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.

All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have <u>not</u> been undertaken, explain why: 6/1/21

This C-141 is being filed as directed by NMOCD letter and attachments dated May 20, 2021. In general, Strata disputes the allegations, findings, and conclusions. Upon initial review and investigation, Strata disputes that any single event or accumulation of events resulted in a stain, leak or "release" which was of Minor or Major nature. We also dispute that any release was improperly "characterized" or "covered". Strata's personnel determined that the release was below the reporting thresholds. The allegation of "covering" is not accurate as Strata personnel used nearby soil or sand to absorb and stabilize non-reportable amounts of liquid. This facility has undergone upgrade, repairs, and remediation many times. This site either has been or will be addressed in the near term during routine maintenance and clean up or, as a result of scheduled remedial, recompletion or plugging and abandonment operations on this well or area wells.

Initial comments regarding pictures:

Page 30, Pic 1, 2, 3, & 4 – Light staining around wellhead and production equipment located within containment area. Require additional NMOCD clarification.

Page 30, Pic 5 & 6 and Page 31, Pic 1 – These all depict light staining in a lined containment area. Require additional NMOCD clarification.

Page 31, Pic 2 – Light staining around production facility located in containment area. Require additional NMOCD clarification.

Page 31, Pic 3 – Light staining located in lined containment area. Require additional NMOCD clarification.

Page 31, Pic 4 – Depicts area not located at this site. See discussion on API # 30-015-25454, FNRU #3.

Strata looks forward to additional clarification and discussion with NMOCD and remains committed to a prompt resolution of all legitimate concerns.

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

Page 2

Received by OCI Form C-141 Page 3	D: 9/23/2021 3:47:00 PM State of New Mexic Oil Conservation Divi		Incident ID District RP Facility ID Application ID	Page 6 of 14 NAPP2116666048
regulations all public health of failed to adequa	that the information given above is true and complet operators are required to report and/or file certain rele r the environment. The acceptance of a C-141 report ately investigate and remediate contamination that po acceptance of a C-141 report does not relieve the ope ons.	ease notifications and perform co by the OCD does not relieve the see a threat to groundwater, surfa	prrective actions for rele e operator of liability sh ace water, human health	eases which may endanger ould their operations have or the environment. In
Printed Name	: _Matt Murphy	Title: <u>Operations Manag</u>	er	
Signature:	Matt Murphy	Date: <u>06/01/2021</u>		
email: <u>matt@</u>	stratanm.com	Telephone: <u>720-468-3646</u>		
OCD Only				
Received by:		Date:		

Page 7

Oil Conservation Division

	Page 7 of	14
Incident ID	NAPP2116666048	
District RP		
Facility ID		
Application ID		

Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

<u>Closure Report Attachment Checklist</u>: Each of the following item	as must be included in the closure report.
x A scaled site and sampling diagram as described in 19.15.29.11	MAC
\mathbf{x} Photographs of the remediated site prior to backfill or photos of must be notified 2 days prior to liner inspection)	the liner integrity if applicable (Note: appropriate OCD District office
Laboratory analyses of final sampling (Note: appropriate ODC D	istrict office must be notified 2 days prior to final sampling)
Description of remediation activities NOTE: The above items (if required) will be provided after recla	mation process is completed.
and regulations all operators are required to report and/or file certain re- may endanger public health or the environment. The acceptance of a C should their operations have failed to adequately investigate and remec human health or the environment. In addition, OCD acceptance of a C compliance with any other federal, state, or local laws and/or regulatio restore, reclaim, and re-vegetate the impacted surface area to the condi accordance with 19.15.29.13 NMAC including notification to the OCE Printed Name: <u>Shammy Dennis</u>	C-141 report by the OCD does not relieve the operator of liability liate contamination that pose a threat to groundwater, surface water, -141 report does not relieve the operator of responsibility for ns. The responsible party acknowledges they must substantially tions that existed prior to the release or their final land use in 0 when reclamation and re-vegetation are complete. Title: <u>_Administrative Support</u>
Signature: <u>Shammy Dennís</u>	_ Date: <u>6/1/2021</u>
email: <u>sdennis@stratanm.com</u>	Telephone: <u>575-622-1127 ext. 13</u>
OCD Only	
Received by: Chad Hensley	Date:09/24/2021
remediate contamination that poses a threat to groundwater, surface wat party of compliance with any other federal, state, or local laws and/or n	
Closure Approved by:	Date: 09/24/2021
Printed Name: Chad Hensley	Title:Environmental Specialist Advanced

Released to Imaging: 9/24/2021 8:05:15 AM

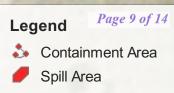


Appendix B

Site Map



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Appendix C

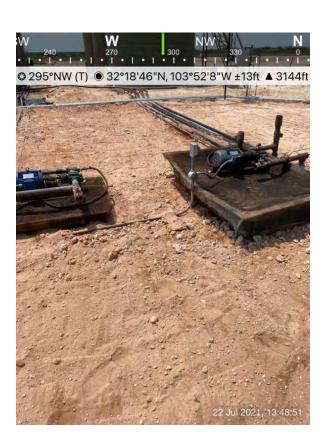
Photographic Documentation

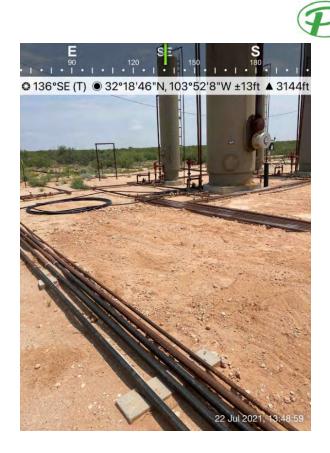


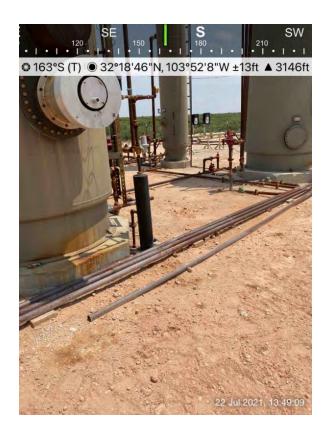
SITE PHOTOGRAPHS STRATA PRODUCTION COMPANY FORTY NINER RIDGE UNIT #13

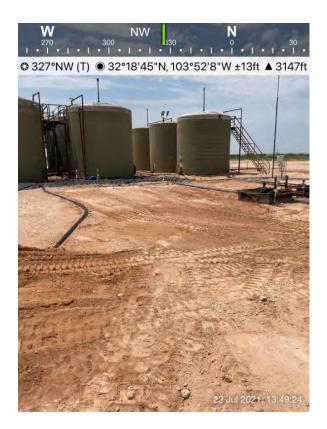
























District I 1625 N. French Dr., Hobbs, NM 88240 Phone:(575) 393-6161 Fax:(575) 393-0720 District II

811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

District III

1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

District IV

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone: (505) 476-3470 Fax: (505) 476-3462

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

CONDITIONS

Operator:	OGRID:
Pima Environmental Services, LLC	329999
1601 N. Turner	Action Number:
Hobbs, NM 88240	51648
	Action Type:
	[C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
chensley	None	9/24/2021

CONDITIONS

Page 14 of 14

Action 51648