

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

State of New Mexico
Energy Minerals and Natural
Resources Department

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

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	NAPP2121626624
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party	Strata Production Co	OGRID	21712
Contact Name	Mitch Krakauskas	Contact Telephone	
Contact email		Incident # (assigned by OCD)	NAPP2121626624
Contact mailing address	P.O. Box 1030 Roswell, NM 88202-1030		

Location of Release Source

Latitude N 32.6974678 Longitude W -103.716568
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Paloma St #1	Site Type	Tank Battery
Date Release Discovered	3/15/2021	API# (if applicable)	30-025-31153

Unit Letter	Section	Township	Range	County
O	36	18S	32E	LEA COUNTY, NM

Surface Owner: State Federal Tribal Private (Name: _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) Unknown	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

Sometime before 3/15/21, a leak of produced fluids occurred in the tank battery of the Paloma St #1. All fluids were contained by the lined berm containment and were not observed to have been released outside of the containment.

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State of New Mexico
Oil Conservation Division

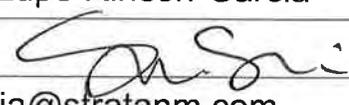
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Was this a major release as defined by 19.15.29.7(A) NMAC? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? The exact volume of the release is unknown, this warrants the major release classification.
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? Yes, NMOCD documented the remnants of the release on 3/15/21.	

Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
If all the actions described above have <u>not</u> been undertaken, explain why: All fluid and residue has been removed from the area and disposed of at an NMOCD approved facility. A liner inspection has been performed and the results will be provided at a later date.
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.
Printed Name: <u>Lupe Rincon-Garcia</u> Title: _____ Signature: <u></u> Date: <u>08/24/2021</u> email: <u>lrgarcia@stratanm.com</u> Telephone: <u>575-622-1127</u>
OCD Only Received by: _____ Date: _____

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Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	_____ (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: Each of the following items must be included in the report.

- Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- Field data
- Data table of soil contaminant concentration data
- Depth to water determination
- Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- Boring or excavation logs
- Photographs including date and GIS information
- Topographic/Aerial maps
- Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

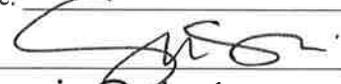
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Printed Name: Lupe Rincon-Garcia Title: _____
 Signature:  Date: 08-24-2021
 email: lrgarcia@stratanm.com Telephone: 575-622-1127

OCD Only

Received by: _____ Date: _____

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Remediation Plan

Remediation Plan Checklist: *Each of the following items must be included in the plan.*

- Detailed description of proposed remediation technique
- Scaled sitemap with GPS coordinates showing delineation points
- Estimated volume of material to be remediated
- Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- Extents of contamination must be fully delineated.
- Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

- Approved Approved with Attached Conditions of Approval Denied Deferral Approved

Signature: _____ Date: _____

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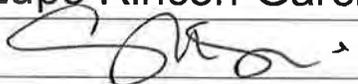
Closure

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.

Closure Report Attachment Checklist: Each of the following items must be included in the closure report.

- A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- Description of remediation activities

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.

Printed Name: Lupe Rincon-Garcia Title: _____
 Signature:  Date: 8/24/2021
 email: lrgarcia@stratanm.com Telephone: 575-622-1127

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Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____



Photographic Documentation



**Strata Production Company
Paloma St #1**

**Closure Report
UL O, Section 36, T18S, R32E
Lea County, New Mexico**

NAPP2121626624

August 24, 2021



Prepared for:

**Strata Production Company
P.O. Box 1030
Roswell, New Mexico 88202**

By:

**Safety & Environmental Solutions, Inc.
703 East Clinton Street
Hobbs, New Mexico 88240**

Company Contacts

Representative	Company	Telephone	E-mail
Mitch Krakauskas	Strata Production Co	575-622-1127	mkrakauskas@stratanm.com
Bob Allen	SESI	575-397-0510	ballen@sesi-nm.com

Background

Safety and Environmental Solutions, Inc., hereinafter referred to as (SESI) was engaged by Devon Energy to perform a site assessment at the Paloma State #1 concerning an unknown release inside containment. In response to an observation made by the NMOCD, photo evidence of a historic release was documented. This site is situated in Lea County, Section 36, Township 18S, and Range 32E.

SESI personnel performed an assessment of the site in July of 2021. SESI personnel mapped the leak.

Surface and Ground Water

Based on the NMOCD Oil and Gas map included in this report, surface water is not present within 3,000 feet of this release. The New Mexico Office of the State Engineer records indicates the average depth to groundwater for the area to be between 80' and 120' bgs.

Characterization

In July 2021, SESI personnel performed a liner inspection to establish the extent of release. During the initial site visit, there was no evidence to conclude that any fluids left the lined containment area. Upon further inspection of the liner, no holes, rips, tears, or other malfunctions were observed in the liner. It was then determined that no soil samples would be taken, as there was no soil impacted.

Remediation

As a result of the site visit and visual inspection of the liner, there was no further action needed at this time. No remediation occurred as there was no evidence of impacted soils.

Closure Request

SESI believes the release area to be properly remediated according to the closure criteria set forth in Table I of the Spill Rule 19.15.29 NMAC. Therefore, SESI, on behalf of Strata Production Company respectfully requests closure of this release. Supplemental information has been included in this report to support our closure request.

Supplemental Documentation for Closure

Map of Release with sample locations
Photos of release and remediation
NMOCD Oil and Gas Map
C-141

Strata Prod Co

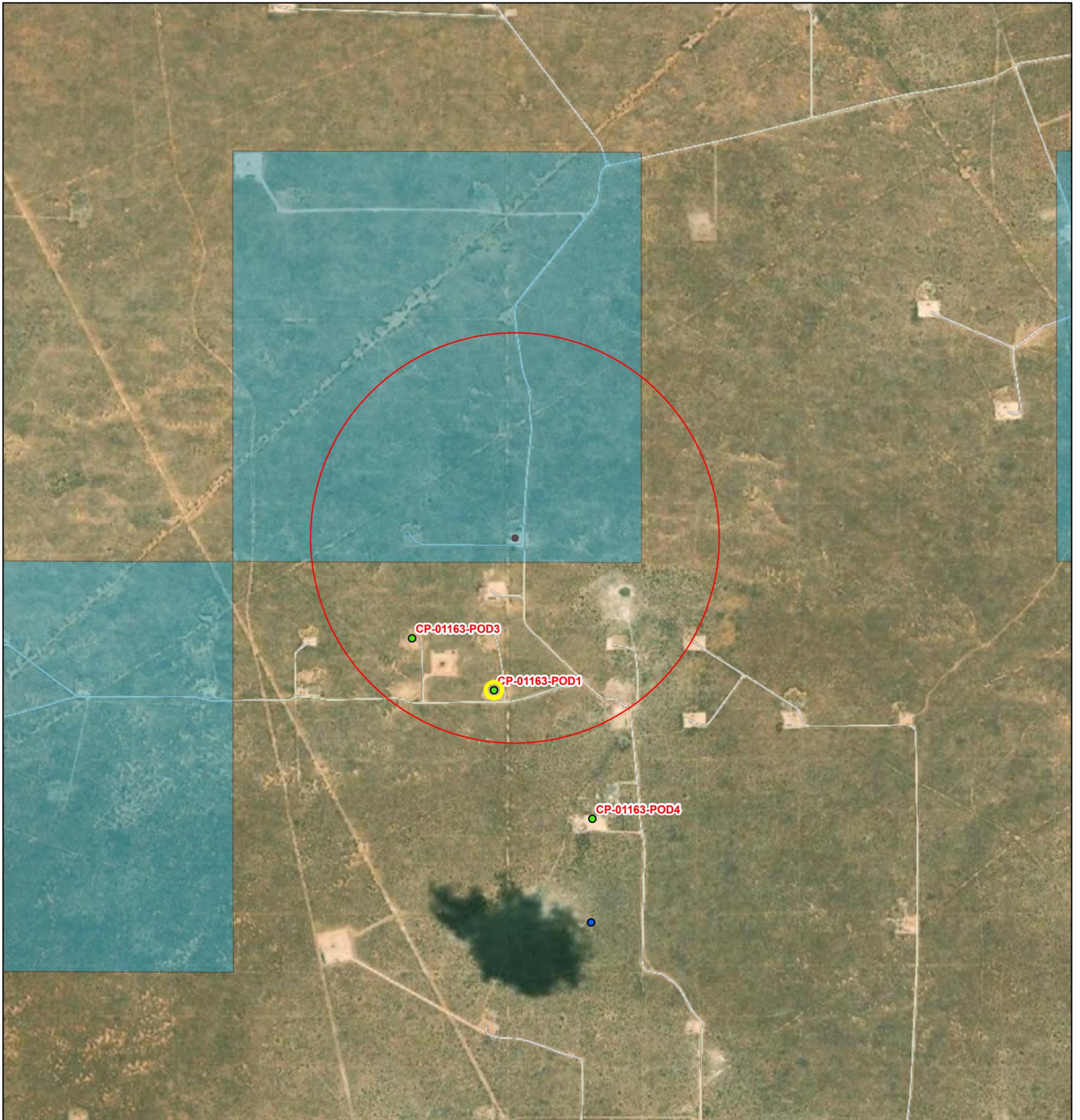
Paloma #1
O-36-T18S-R32E
NAPP2121626624

Legend

 Spill Area



OSE PUBLIC PRINT



8/24/2021, 8:34:08 AM

1:18,056

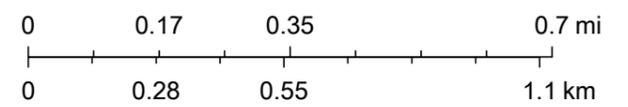
GIS WATERS PODs

- Active
- Pending

OSE District Boundary

New Mexico State Trust Lands

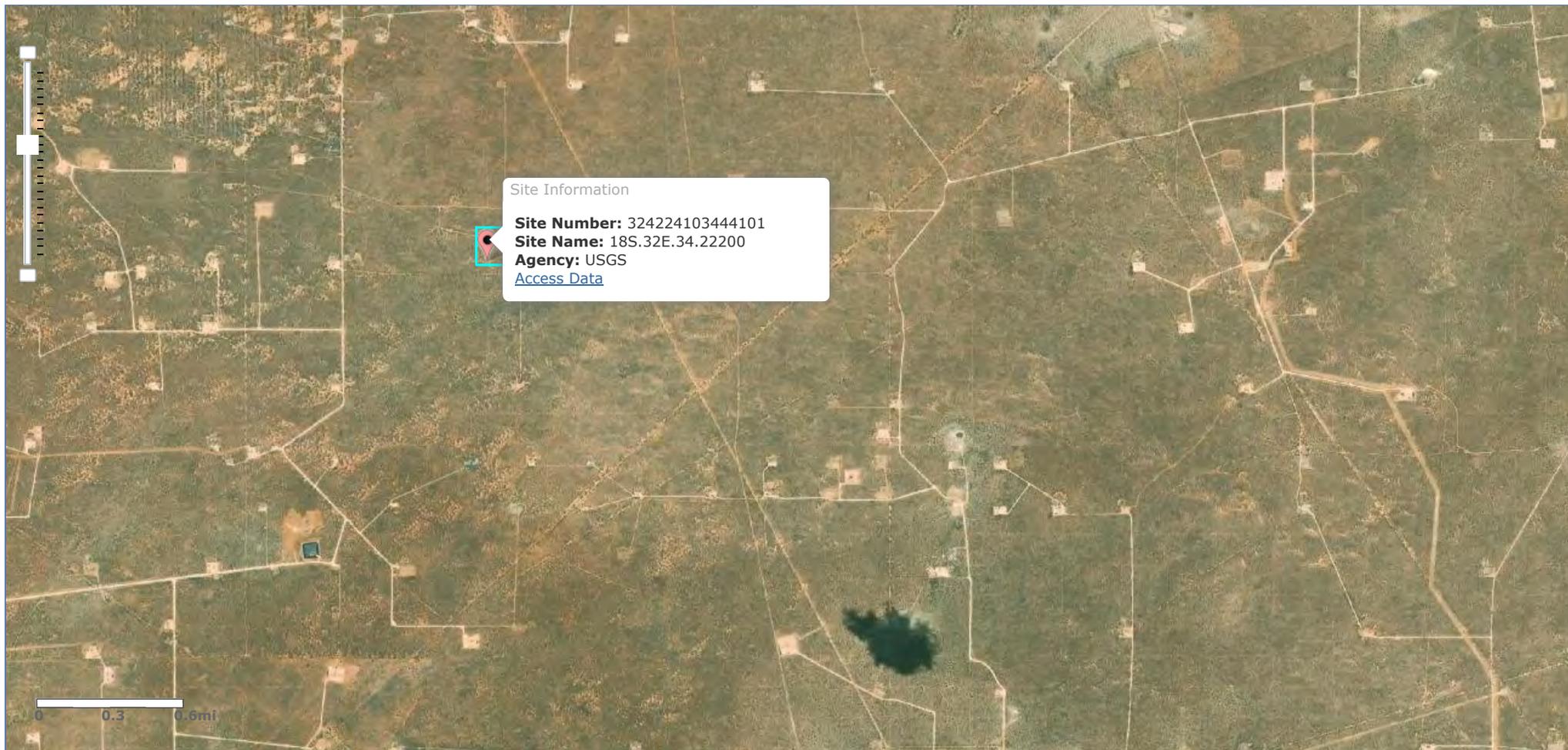
- Both Estates
- SiteBoundaries



Esri, HERE, iPC, U.S. Department of Energy Office of Legacy Management, Esri, HERE, Garmin, iPC, Maxar



National Water Information System: Map View



Site Information
Site Number: 324224103444101
Site Name: 18S.32E.34.22200
Agency: USGS
[Access Data](#)

0 0.3 0.6mi

Strata Inspections March 2021

Strata Paloma State #1 API 30-025-31153





Staining around wellhead.



Release with high concentrations of chloride evident.

Strata Production Company Paloma State #1 Remediation



Strata Production Company Paloma State #1 Remediation



Strata Production Company Paloma State #1 Remediation



Liner Integrity Inspection Report

Name of Site: Stretz Pelona Project #: SIR-21-007

Inspection Tech: Sosa, Jerry Date of Inspection: 07/12/21 Time: 0830AM

Visual Inspection

Type of Secondary Containment:

- Earthen
- Clay
- Supported, Coated Fabrics and Laminates
- Unsupported Geomembranes
- Steel
- Cement

Status:

- Free Fluid in Secondary Containment
- Intermittent Pooling
- Sump has Fluid
- Dry
- Release or leak traces inside containment
- Release or leak traces outside containment

Observations

Environmental Damage:

- Damage from animals or vegetation compromising liner integrity
- Discoloration, erosion, or chemical degradation of the liner
- Degradation of the liner system from storm water flow or erosion of the secondary containment system

Comments:

NONE FOUND

NONE FOUND

NONE FOUND

Physical Damage:

- Cracks, bulges, stains, chips, seepages in the liner system
- Improper or deferred maintenance of the liner system
- Dike wall, foundation, or embankment movement, settlement, or deterioration compromising the integrity of the liner system
- Degradation of the liner system at penetrations (piping, supports, wells, foundations, pads, etc.)
- Damage to the liner system from equipment, vehicles, foot traffic, frost heave, etc.
- Evidence of foundation movement, settlement, or deterioration

Comments:

- NONE FOUND, LINER IS IN GREAT CONDITION.
- NONE FOUND

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Responsible Party

Responsible Party	Strata Production Co	OGRID	21712
Contact Name	Mitch Krakauskas	Contact Telephone	
Contact email		Incident # (assigned by OCD)	NAPP2121626624
Contact mailing address	P.O. Box 1030 Roswell, NM 88202-1030		

Location of Release Source

Latitude N 32.6974678 Longitude W -103.716568
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Paloma St #1	Site Type	Tank Battery
Date Release Discovered	3/15/2021	API# (if applicable)	30-025-31153

Unit Letter	Section	Township	Range	County
O	36	18S	32E	LEA COUNTY, NM

Surface Owner: State Federal Tribal Private (Name: _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) Unknown	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

Sometime before 3/15/21, a leak of produced fluids occurred in the tank battery of the Paloma St #1. All fluids were contained by the lined berm containment and were not observed to have been released outside of the containment.

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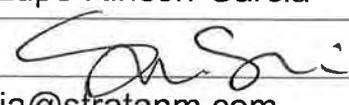
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Was this a major release as defined by 19.15.29.7(A) NMAC? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? The exact volume of the release is unknown, this warrants the major release classification.
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? Yes, NMOCD documented the remnants of the release on 3/15/21.	

Initial Response

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<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
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Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input type="checkbox"/> No
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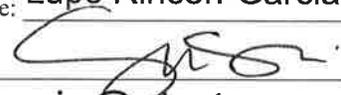
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 email: lrgarcia@stratanm.com Telephone: 575-622-1127

OCD Only

Received by: _____ Date: _____

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Remediation Plan

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- Extents of contamination must be fully delineated.
- Contamination does not cause an imminent risk to human health, the environment, or groundwater.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

- Approved Approved with Attached Conditions of Approval Denied Deferral Approved

Signature: _____ Date: _____

Form C-141

State of New Mexico

Page 6

Oil Conservation Division

Incident ID	NAPP2121626624
District RP	
Facility ID	
Application ID	

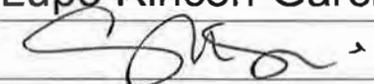
Closure

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.

Closure Report Attachment Checklist: Each of the following items must be included in the closure report.

- A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- Description of remediation activities

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.

Printed Name: Lupe Rincon-Garcia Title: _____
 Signature:  Date: 8/24/2021
 email: lrgarcia@stratanm.com Telephone: 575-622-1127

OCD Only

Received by: _____ Date: _____

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: Jennifer Nobui Date: 09/15/2022
 Printed Name: Jennifer Nobui Title: Environmental Specialist A

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

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

CONDITIONS

Action 143675

CONDITIONS

Operator: STRATA PRODUCTION CO P.O. Box 1030 Roswell, NM 882021030	OGRID: 21712
	Action Number: 143675
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
jnobui	Closure Approved.	9/15/2022