



February 13, 2023

New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**Re: Remediation Work Plan
Rojo 18 ELL and Rojo 18/19 & 38/39 Tank Battery
Incident Numbers nAPP2222753156 and nAPP2123047003
Lea County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of BTA Oil Producers, LLC (BTA), has prepared this *Remediation Work Plan (Work Plan)* to document assessment and soil sampling activities performed at the Rojo 18 ELL and Rojo 18/19 & 38/39 Tank Battery (collectively referred to as the Site) and to detail remedial actions proposed for the Site. The purpose of the Site assessment and soil sampling activities was to address impacts to soil following two overlapping release events at the Site. Based on laboratory analytical results from the soil sampling events, BTA is submitting this *Work Plan*, describing remediation that has occurred and requesting to complete a soil boring to confirm depth to groundwater data as well as complete necessary excavation and proper disposal of impacted soil.

SITE DESCRIPTION AND RELEASE SUMMARY

The Site is located in Unit F, Section 34, Township 25 South, Range 33 East, in Lea County, New Mexico (32.08958°, -103.56642°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM).

nAPP2222753156

On August 14, 2022, a fitting failed on the separator resulting in the release of approximately 43 barrels (bbls) of produced water onto the well pad. A vacuum truck was immediately dispatched to the Site to recover free-standing fluids; approximately 35 bbls of produced water were recovered. BTA reported the release immediately to the New Mexico Oil Conservation Division (NMOCD) on August 14, 2022 and submitted a Release Notification Form C-141 (Form C-141) on August 15, 2022. The release was assigned Incident Number nAPP2222753156.

nAPP2123047003

On August 17, 2022, a piping tee, located under the separator, washed out, resulting in the release of approximately 17 bbls of produced water and 8 bbls of crude oil onto the well pad. A vacuum truck was immediately dispatched to the Site to recover free-standing fluids; approximately 14 bbls of produced water and 6 bbls of crude oil were recovered. BTA reported the release immediately to the NMOCD on August 17, 2022 and submitted a Form C-141 on August 18, 2022. The release was assigned Incident Number nAPP2123047003.

BTA Oil Producers, LLC
Remediation Work Plan
Rojo 18 ELL and Rojo 18/19 & 38/39 Tank Battery

SITE CHARACTERIZATION AND CLOSURE CRITERIA

The Site was characterized to assess the applicability of Table I, Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29 (19.15.29) of the New Mexico Administrative Code (NMAC). Results from the characterization desktop review are presented on page 3 of the Form C-141, Site Assessment/Characterization. Potential site receptors are identified on Figure 1.

Depth to groundwater at the Site is estimated to be greater than 100 feet below ground surface (bgs) based on regional groundwater well data. The closest permitted groundwater well with depth to groundwater data is New Mexico Office of the State Engineer (NMOSE) well C-02313, located approximately 1.15 miles northeast of the Site. The groundwater well has a reported depth to groundwater of 110 feet bgs and a total depth of 150 feet bgs. The reference well log is included in Appendix A.

The closest continuously flowing or significant watercourse to the Site is an intermittent riverine, located approximately 12,438 feet southwest of the Site. The Site is greater than 200 feet from a lakebed, sinkhole, or playa lake and greater than 300 feet from an occupied residence, school, hospital, institution, church, or wetland. The Site is greater than 1,000 feet to a freshwater well or spring and is not within a 100-year floodplain or overlying a subsurface mine. The Site is not underlain by unstable geology (low potential karst designation area). Site receptors are identified on Figure 1.

Conservatively based on the results of the Site Characterization, the following NMOCD Table I Closure Criteria (Closure Criteria) apply:

- Benzene: 10 milligrams per kilogram (mg/kg)
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg
- Total petroleum hydrocarbons (TPH) - gasoline range organics (GRO) and TPH-diesel range organics (DRO): 1,000 mg/kg
- TPH: 2,500 mg/kg
- Chloride: 20,000 mg/kg

SITE ASSESSMENT ACTIVITIES AND ANALYTICAL RESULTS

On October 24, 2022, Ensolum personnel were at the Site to evaluate the overlapping release extents based on information provided on the Form C-141s and visual observations. Six delineation soil samples (SS01 through SS06) were collected within and around the release extent at a depth of approximately 0.5 feet bgs to assess surficial soil associated with the releases. The soil samples were field screened for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID) and chloride utilizing Hach® chloride QuanTab® test strips. The soil sample locations were mapped utilizing a handheld Global Positioning System (GPS) unit and are depicted on Figure 2. Photographic documentation was completed during the Site visit and a photographic log is included in Appendix B.

The soil samples were placed directly into pre-cleaned glass jars, labeled with the location, date, time, sampler name, method of analysis, and immediately placed on ice. The soil samples were transported under strict chain-of-custody procedures to Cardinal Laboratories (Cardinal) in Hobbs, New Mexico, for analysis of the following chemicals of concern (COCs): BTEX following United States Environmental Protection Agency (EPA) Method 8021B; TPH-GRO, TPH-DRO, and TPH-oil range organics (ORO) following EPA Method 8015M/D; and chloride following EPA Method SM4500.

BTA Oil Producers, LLC
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Rojo 18 ELL and Rojo 18/19 & 38/39 Tank Battery

Laboratory analytical results for delineation soil sample SS02, collected within the release extents, indicated TPH concentrations exceeded the Closure Criteria. Laboratory analytical results for delineation soil samples SS01, collected within the release extent, indicated all COC concentrations were compliant with the Closure Criteria. Delineation soil samples SS03 through SS06, collected around the release extent, indicated all COC concentrations were compliant with the Closure Criteria and the strictest Closure Criteria, successfully defining the lateral extent of the release. Soil analytical results are summarized on Table 1. The laboratory analytical report and chain of custody documentation is presented in Appendix C.

Based on visible staining in the release areas and laboratory analytical results of soil sample SS02, additional delineation and excavation activities appear to be warranted.

REMEDIATION WORK PLAN

Site assessment activities were conducted at the Site to address impacted soil resulting from two overlapping release events at the Site. Delineation soil samples collected around the release area met the strictest Closure Criteria, indicating the release area did not extend to the pasture. Based on the soil sample laboratory analytical results, BTA proposes the following remediation activities:

- BTA proposes to further evaluate depth to groundwater at the Site to verify the Site characterization. Depth to groundwater has been estimated to be greater than 100 feet bgs and no other sensitive receptors were identified near the release extent; however, accessible depth to groundwater data is neither current (data collected within the last 25 years) nor within 0.5 miles as preferred by the NMOCD. To confirm depth to groundwater is greater than 100 feet bgs in the vicinity of the Site, BTA will prepare and submit a Permit to Drill a Well with No Water Right (WR-07) to the NMOSE to advance a soil boring to a depth of at least 105 feet bgs and within 0.5 mile of the Site. The lithology and soil conditions for evidence of a water-bearing zone will be observed and documented throughout drilling activities. The boring will be allowed to stabilize for at least 72 hours post drilling activities and then checked for the presence or absence of water.
- Following confirmation of the depth to groundwater, BTA proposes to collect additional delineation within the release extent, at the location of SS01 and to the east of SS01, again within the release extent, to confirm the vertical extent soil impacts.
- Additionally, BTA proposes to excavate the impacted soil identified by soil sample SS02 at 0.5 feet bgs.


BTA believes the work completed and additional scope of work described above will meet requirements set forth in NMAC 19.15.29.13 and be protective of human health, the environment, and groundwater. As such, BTA respectfully requests approval of this *Work Plan* from NMOCD.

BTA will submit a *Closure Request* or *Remediation Work Plan* 90 days following receipt of final analytical laboratory reports or completion of the depth to water soil boring.


BTA Oil Producers, LLC
Remediation Work Plan
Rojo 18 ELL and Rojo 18/19 & 38/39 Tank Battery

If you have any questions or comments, please contact Ms. Tacoma Morrissey at (337) 257-8307 or tmorrissey@ensolum.com.

Sincerely,
Ensolum, LLC



Hadlie Green
Staff Geologist



Tacoma Morrissey
Senior Geologist

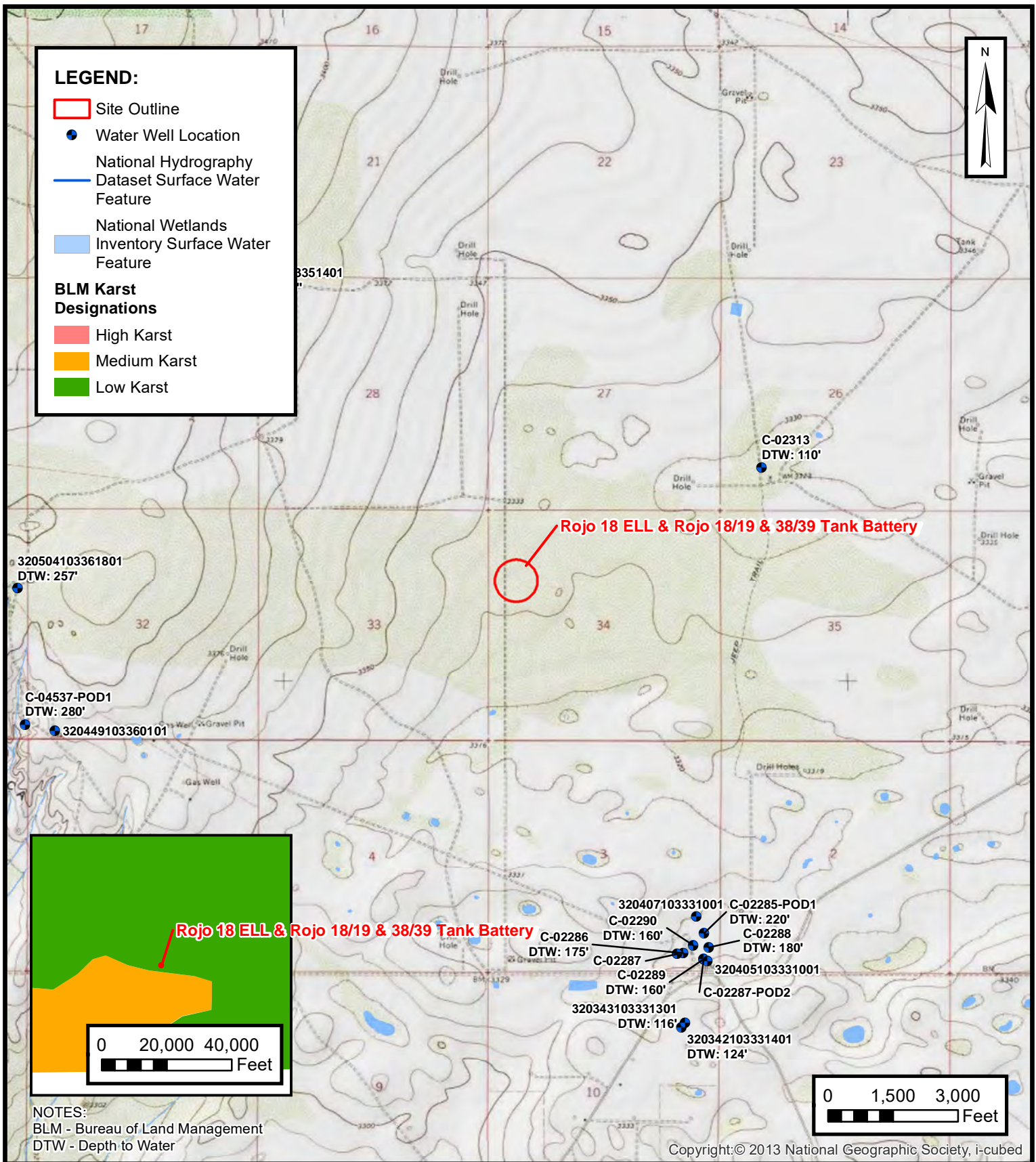
cc: Bob Hall, BTA Oil Producers, LLC
Bureau of Land Management

Appendices:

Figure 1	Site Receptor Map
Figure 2	Delineation Soil Sample Locations
Table 1	Soil Sample Analytical Results
Appendix A	Referenced Well Records
Appendix B	Photographic Log
Appendix C	Laboratory Analytical Reports & Chain-of-Custody Documentation
Appendix D	NMOCD Notifications
Appendix E	Form C-141



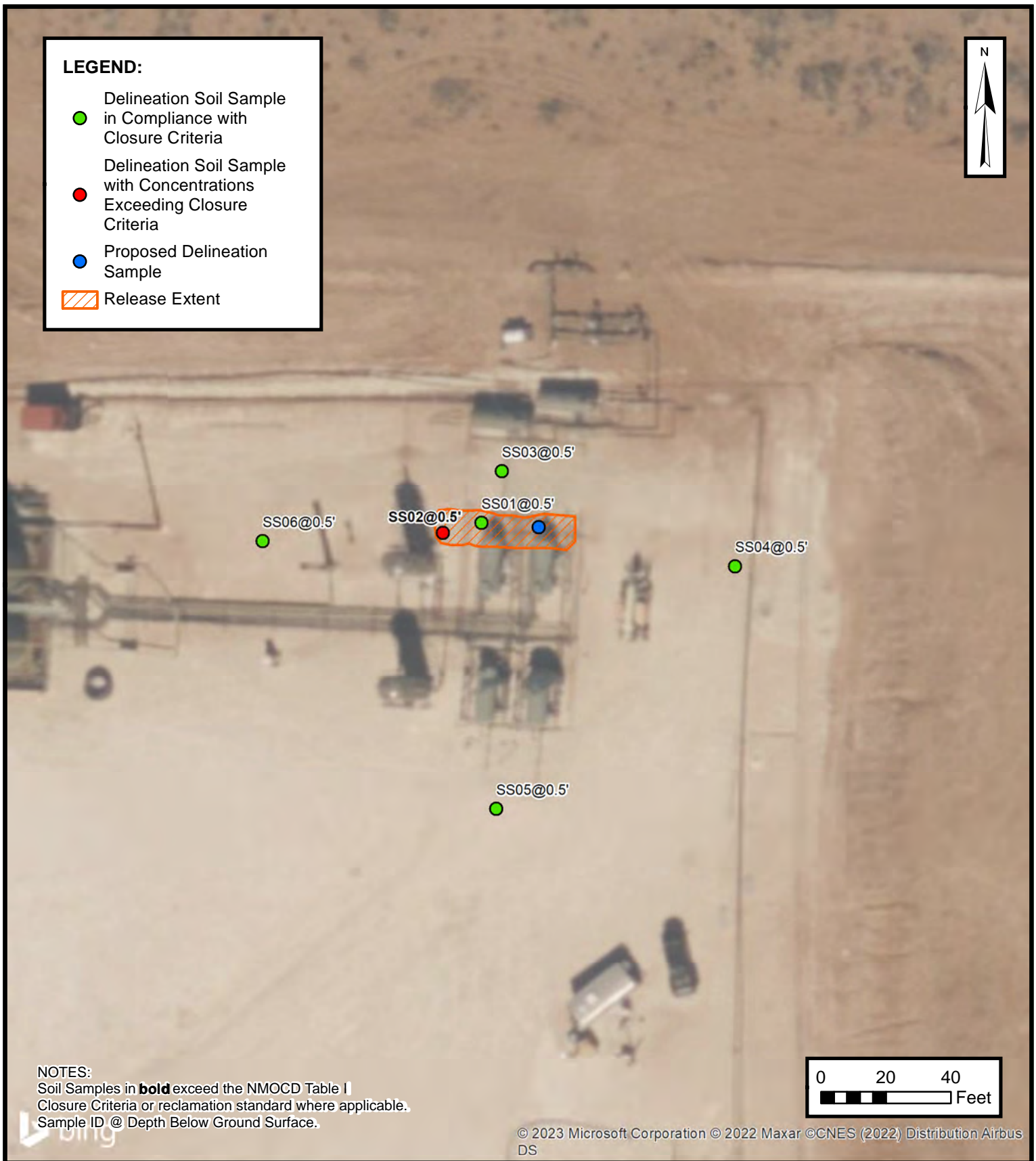
FIGURES



SITE RECEPTOR MAP

BTA OIL PRODUCERS, LLC
ROJO 18 ELL & ROJO 18/19 & 38/39 TANK BATTERY
 Incident Numbers: nAPP222753156 & nAPP2123047003
 Unit F Sec 34 T25S R33E
 Lea County, New Mexico

FIGURE
1



DELINEATION SOIL SAMPLE LOCATIONS

BTA OIL PRODUCERS, LLC
 ROJO 18 ELL & ROJO 18/19 & 38/39 TANK BATTERY
 Incident Numbers: nAPP2222753156 & nAPP2123047003
 Unit F Sec 34 T25S R33E
 Lea County, New Mexico

FIGURE

2





TABLES



TABLE 1
SOIL SAMPLE ANALYTICAL RESULTS
 Rojo 18 ELL and Rojo 18/19 & 38/39
 BTA Oil Producers, LLC
 Lea County, New Mexico

Sample I.D.	Sample Date	Sample Depth (feet bgs)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)	TPH ORO (mg/kg)	GRO+DRO (mg/kg)	Total TPH (mg/kg)	Chloride (mg/kg)
NMOCD Table I Closure Criteria (NMAC 19.15.29)			10	50	NE	NE	NE	1,000	2,500	20,000
Delineation Soil Samples										
SS01	10/24/2022	0.5	<0.050	<0.300	<10.0	46.0	13.8	46.0	46.0	480
SS02	10/24/2022	0.5	<0.050	<0.300	71.9	2,690	573	2,690	2,690	7,200
SS03	10/24/2022	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	80.0
SS04	10/24/2022	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	32.0
SS05	10/24/2022	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	48.0
SS06	10/24/2022	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	48.0

Notes:

bgs: below ground surface

mg/kg: milligrams per kilogram

NMOCD: New Mexico Oil Conservation Division

BTEX: Benzene, Toluene, Ethylbenzene, and Xylenes

Concentrations in **bold** exceed the NMOCD Table I Closure Criteria or reclamation standard where applicable.

GRO: Gasoline Range Organics

DRO: Diesel Range Organics

ORO: Oil Range Organics

TPH: Total Petroleum Hydrocarbon




APPENDIX A

Referenced Well Records



New Mexico Office of the State Engineer

Point of Diversion Summary

Well Tag	POD Number	(quarters are 1=NW 2=NE 3=SW 4=SE) (quarters are smallest to largest)						(NAD83 UTM in meters)	
		Q64	Q16	Q4	Sec	Tw	Rng	X	Y
	C 02313	2	3	3	26	25S	33E	636971	3552098* 
<hr/>									
Driller License:					Driller Company:				
Driller Name: UNKNOWN									
Drill Start Date: 01/01/1925			Drill Finish Date: 06/30/1925			Plug Date:			
Log File Date:			PCW Rev Date:			Source:			
Pump Type:			Pipe Discharge Size:			Estimated Yield: 60 GPM			
Casing Size: 6.88			Depth Well: 150 feet			Depth Water: 110 feet			

*UTM location was derived from PLSS - see Help

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.

2/6/23 10:42 AM

POINT OF DIVERSION SUMMARY



APPENDIX B

Photographic Log



Photographic Log

BTA Oil Producers, LLC

Rojo 18 ELL and Rojo 18/19 & 38/39 Tank Battery
nAPP2222753156 & nAPP2123047003



Photograph: 1 Date: 8/14/2022
Description: Soil staining in release footprint
View: Northwest



Photograph: 2 Date: 8/17/2022
Description: Soil staining in release footprint
View: East



Photograph: 3 Date: 10/20/2022
Description: Initial Assessment Activities
View: Northwest



Photograph: 4 Date: 10/20/2022
Description: Initial Assessment Activities
View: Southeast



APPENDIX C

Laboratory Analytical Reports & Chain of Custody Documentation



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

October 31, 2022

HADLIE GREEN

ENSOLUM, LLC

705 W WADLEY AVE.

MIDLAND, TX 79705

RE: ROJO 18 ELL

Enclosed are the results of analyses for samples received by the laboratory on 10/24/22 14:22.

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".

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

ENSOLUM, LLC
 HADLIE GREEN
 705 W WADLEY AVE.
 MIDLAND TX, 79705
 Fax To:

Received: 10/24/2022
 Reported: 10/31/2022
 Project Name: ROJO 18 ELL
 Project Number: 03C2012007
 Project Location: BTA

Sampling Date: 10/20/2022
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Shalyn Rodriguez

Sample ID: SS 01 .5' (H224991-01)

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	10/30/2022	ND	1.95	97.7	2.00	11.3	
Toluene*	<0.050	0.050	10/30/2022	ND	2.12	106	2.00	11.9	
Ethylbenzene*	<0.050	0.050	10/30/2022	ND	2.10	105	2.00	12.5	
Total Xylenes*	<0.150	0.150	10/30/2022	ND	6.28	105	6.00	12.4	
Total BTEX	<0.300	0.300	10/30/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 90.8 % 69.9-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	480	16.0	10/27/2022	ND	400	100	400	11.3	

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	10/28/2022	ND	191	95.5	200	1.86	
DRO >C10-C28*	46.0	10.0	10/28/2022	ND	192	96.1	200	2.07	
EXT DRO >C28-C36	13.8	10.0	10/28/2022	ND					

Surrogate: 1-Chlorooctane 87.5 % 45.3-161

Surrogate: 1-Chlorooctadecane 89.2 % 46.3-178

Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

ENSOLUM, LLC
 HADLIE GREEN
 705 W WADLEY AVE.
 MIDLAND TX, 79705
 Fax To:

Received: 10/24/2022
 Reported: 10/31/2022
 Project Name: ROJO 18 ELL
 Project Number: 03C2012007
 Project Location: BTA

Sampling Date: 10/20/2022
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Shalyn Rodriguez

Sample ID: SS 02 .5' (H224991-02)

BTX 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	10/30/2022	ND	1.95	97.7	2.00	11.3		
Toluene*	<0.050	0.050	10/30/2022	ND	2.12	106	2.00	11.9		
Ethylbenzene*	<0.050	0.050	10/30/2022	ND	2.10	105	2.00	12.5		
Total Xylenes*	<0.150	0.150	10/30/2022	ND	6.28	105	6.00	12.4		
Total BTX	<0.300	0.300	10/30/2022	ND						

Surrogate: 4-Bromofluorobenzene (PID) 108 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	7200	16.0	10/27/2022	ND	400	100	400	11.3		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	71.9	10.0	10/28/2022	ND	191	95.5	200	1.86	
DRO >C10-C28*	2690	10.0	10/28/2022	ND	192	96.1	200	2.07	
EXT DRO >C28-C36	573	10.0	10/28/2022	ND					

Surrogate: 1-Chlorooctane 114 % 45.3-161

Surrogate: 1-Chlorooctadecane 101 % 46.3-178

Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager

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

Notes and Definitions

S-06	The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
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

Cardinal Laboratories

*=Accredited Analyte

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A handwritten signature in black ink, appearing to read "Celey D. Keene", is written over a horizontal line.

Celey D. Keene, Lab Director/Quality Manager



ANALYSIS REQUEST

[illegible]



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

November 04, 2022

HADLIE GREEN

ENSOLUM, LLC

705 W WADLEY AVE.

MIDLAND, TX 79705

RE: ROJO 18 ELL

Enclosed are the results of analyses for samples received by the laboratory on 10/24/22 14:22.

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.

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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 "Mike Snyder". The signature is fluid and cursive, with the first name "Mike" and last name "Snyder" clearly distinguishable.

Mike Snyder For Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

ENSOLUM, LLC
 HADLIE GREEN
 705 W WADLEY AVE.
 MIDLAND TX, 79705
 Fax To:

Received: 10/24/2022
 Reported: 11/04/2022
 Project Name: ROJO 18 ELL
 Project Number: 03C2012007
 Project Location: BTA

Sampling Date: 10/20/2022
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Shalyn Rodriguez

Sample ID: SS 03 .5' (H224992-01)

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	10/30/2022	ND	1.95	97.7	2.00	11.3		
Toluene*	<0.050	0.050	10/30/2022	ND	2.12	106	2.00	11.9		
Ethylbenzene*	<0.050	0.050	10/30/2022	ND	2.10	105	2.00	12.5		
Total Xylenes*	<0.150	0.150	10/30/2022	ND	6.28	105	6.00	12.4		
Total BTEX	<0.300	0.300	10/30/2022	ND						

Surrogate: 4-Bromofluorobenzene (PID) 90.7 % 69.9-140

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	10/27/2022	ND	400	100	400	11.3		

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	10/31/2022	ND	191	95.5	200	1.86	
DRO >C10-C28*	<10.0	10.0	10/31/2022	ND	192	96.1	200	2.07	
EXT DRO >C28-C36	<10.0	10.0	10/31/2022	ND					

Surrogate: 1-Chlorooctane 86.4 % 45.3-161

Surrogate: 1-Chlorooctadecane 105 % 46.3-178

Cardinal Laboratories

*=Accredited Analyte

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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 HADLIE GREEN
 705 W WADLEY AVE.
 MIDLAND TX, 79705
 Fax To:

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 Project Name: ROJO 18 ELL
 Project Number: 03C2012007
 Project Location: BTA

Sampling Date: 10/20/2022
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Shalyn Rodriguez

Sample ID: SS 04 .5' (H224992-02)

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	10/30/2022	ND	1.95	97.7	2.00	11.3		
Toluene*	<0.050	0.050	10/30/2022	ND	2.12	106	2.00	11.9		
Ethylbenzene*	<0.050	0.050	10/30/2022	ND	2.10	105	2.00	12.5		
Total Xylenes*	<0.150	0.150	10/30/2022	ND	6.28	105	6.00	12.4		
Total BTEX	<0.300	0.300	10/30/2022	ND						

Surrogate: 4-Bromofluorobenzene (PID) 92.8 % 69.9-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	10/27/2022	ND	400	100	400	11.3	

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	10/28/2022	ND	191	95.5	200	1.86	
DRO >C10-C28*	<10.0	10.0	10/28/2022	ND	192	96.1	200	2.07	
EXT DRO >C28-C36	<10.0	10.0	10/28/2022	ND					

Surrogate: 1-Chlorooctane 78.5 % 45.3-161

Surrogate: 1-Chlorooctadecane 80.3 % 46.3-178

Cardinal Laboratories

*=Accredited Analyte

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

ENSOLUM, LLC
 HADLIE GREEN
 705 W WADLEY AVE.
 MIDLAND TX, 79705
 Fax To:

Received: 10/24/2022
 Reported: 11/04/2022
 Project Name: ROJO 18 ELL
 Project Number: 03C2012007
 Project Location: BTA

Sampling Date: 10/20/2022
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Shalyn Rodriguez

Sample ID: SS 05 .5' (H224992-03)

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	10/30/2022	ND	1.95	97.7	2.00	11.3		
Toluene*	<0.050	0.050	10/30/2022	ND	2.12	106	2.00	11.9		
Ethylbenzene*	<0.050	0.050	10/30/2022	ND	2.10	105	2.00	12.5		
Total Xylenes*	<0.150	0.150	10/30/2022	ND	6.28	105	6.00	12.4		
Total BTEX	<0.300	0.300	10/30/2022	ND						

Surrogate: 4-Bromofluorobenzene (PID) 90.8 % 69.9-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	10/27/2022	ND	400	100	400	11.3	

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	10/28/2022	ND	191	95.5	200	1.86	
DRO >C10-C28*	<10.0	10.0	10/28/2022	ND	192	96.1	200	2.07	
EXT DRO >C28-C36	<10.0	10.0	10/28/2022	ND					

Surrogate: 1-Chlorooctane 88.1 % 45.3-161

Surrogate: 1-Chlorooctadecane 86.6 % 46.3-178

Cardinal Laboratories

*=Accredited Analyte

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

ENSOLUM, LLC
 HADLIE GREEN
 705 W WADLEY AVE.
 MIDLAND TX, 79705
 Fax To:

Received: 10/24/2022
 Reported: 11/04/2022
 Project Name: ROJO 18 ELL
 Project Number: 03C2012007
 Project Location: BTA

Sampling Date: 10/20/2022
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Shalyn Rodriguez

Sample ID: SS 06 .5' (H224992-04)

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	10/30/2022	ND	1.95	97.7	2.00	11.3		
Toluene*	<0.050	0.050	10/30/2022	ND	2.12	106	2.00	11.9		
Ethylbenzene*	<0.050	0.050	10/30/2022	ND	2.10	105	2.00	12.5		
Total Xylenes*	<0.150	0.150	10/30/2022	ND	6.28	105	6.00	12.4		
Total BTEX	<0.300	0.300	10/30/2022	ND						

Surrogate: 4-Bromofluorobenzene (PID) 90.3 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	10/27/2022	ND	400	100	400	11.3		

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	10/28/2022	ND	191	95.5	200	1.86	
DRO >C10-C28*	<10.0	10.0	10/28/2022	ND	192	96.1	200	2.07	
EXT DRO >C28-C36	<10.0	10.0	10/28/2022	ND					

Surrogate: 1-Chlorooctane 80.7 % 45.3-161

Surrogate: 1-Chlorooctadecane 79.9 % 46.3-178

Cardinal Laboratories

*=Accredited Analyte

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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

Notes and Definitions

S-06	The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
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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*=Accredited Analyte

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A handwritten signature in black ink, appearing to read "Mike Snyder", is written over a horizontal line.

Mike Snyder For 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: Ensolum, LLC

Project Manager: Hadlie Green

Address: 601 N. Mainfield St. STE 400

City: Midland State: TX Zip: 79701

Phone #: 432-557-8895 Fax #: 805-705-2608

Project #: 03C2012007 Project Owner: BTA 011

Project Name: Rojo 18 ELL

Project Location:

Sampler Name: Conner Whifren

P.O. #:

Company: BTA 011

Address: 104 S. Pecos St.

City: Midland

State: TX Zip: 79701

Phone #: 432-312-2203

Fax #:

ANALYSIS REQUEST

Lab I.D.	Sample I.D.	Sample Depth (feet)	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX							DATE	TIME	BTEx	TPH	Chloride
					GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:					
H224992	55043	5'	G 1	1								10/20/22	11:30	/	/	/
	55044	5'	G 1	1								11:35	11:40	/	/	/
	55045	5'	G 1	1								11:45	11:45	/	/	/
	55046	5'	G 1	1										/	/	/

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Relinquished By:

Date: 10/24/22 Received By: [Signature]

Verbal Result: ☐ Yes ☐ No Add'l Phone #:

Remarks: [Signature]

Relinquished By:

Date: 10/24/22 Received By: [Signature]

Remarks: [Signature]

Delivered By: (Circle One)

Observed Temp. °C 1.2

Sample Condition: ☒ Intact ☐ Cool ☐ Yes ☐ No

CHECKED BY: [Signature]

Turnaround Time: Standard ☒ Rush ☐

Thermometer ID #113

Correction Factor: -0.5°C

Bacteria (only) Sample Condition: ☐ Cool ☐ Intact ☐ Yes ☐ No

Observed Temp. °C

Corrected Temp. °C

Sampler - UPS - Bus - Other:

Corrected Temp. °C 0.6

☐ Yes ☐ No

[Signature]

Thermometer ID #113

Correction Factor: -0.5°C

Bacteria (only) Sample Condition: ☐ Cool ☐ Intact ☐ Yes ☐ No

Observed Temp. °C

Corrected Temp. °C

FORM 0000 R-0.2 10/07/21

† Cardinal cannot accept verbal changes. Please email changes to celey.keene@cardinallabsnm.com



APPENDIX D

NMOCD Notifications

From: [Nobui, Jennifer, EMNRD](#)
To: [Tacoma Morrissey](#)
Cc: [Bratcher, Michael, EMNRD](#); [Harimon, Jocelyn, EMNRD](#); [Hamlet, Robert, EMNRD](#)
Subject: FW: [EXTERNAL] BTA - Extension Request - Rojo 18 ELL (Incident Number nAPP2222753156)
Date: Thursday, November 10, 2022 9:27:36 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

[**EXTERNAL EMAIL**]

Tacoma

OCD approves your request for a 90-day extension to February 10, 2023 to submit a remediation plan/closure report to the OCD portal. Please include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

Thanks
Jennifer Nobui

From: Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>
Sent: Thursday, November 10, 2022 8:19 AM
To: Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; Nobui, Jennifer, EMNRD <Jennifer.Nobui@emnrd.nm.gov>
Subject: FW: [EXTERNAL] BTA - Extension Request - Rojo 18 ELL (Incident Number nAPP2222753156)

Jocelyn Harimon • Environmental Specialist
Environmental Bureau
EMNRD - Oil Conservation Division
1220 South St. Francis Drive | Santa Fe, NM 87505
(505)469-2821 | Jocelyn.Harimon@state.nm.us
<http://www.emnrd.nm.gov>



From: Tacoma Morrissey <tmorrissey@ensolum.com>
Sent: Thursday, November 10, 2022 8:12 AM
To: Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>
Cc: Bob Hall <BBHall@btaoil.com>; Hadlie Green <hgreen@ensolum.com>
Subject: [EXTERNAL] BTA - Extension Request - Rojo 18 ELL (Incident Number nAPP2222753156)

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

All,

BTA is requesting an extension for the current deadline of November 12, 2022 for submitting a remediation work plan or closure request required in 19.15.29.12.B.(1) NMAC at the Rojo 18 ELL (Incident Number nAPP2222753156). The release occurred on August 14, 2022. Initial assessment of the release has been completed and remediation is ongoing. In order to complete the remediation activities and submit a remediation work plan or closure request, BTA is requesting a 90-day extension until February 10, 2023.

Thank you,



Tacoma Morrissey

Senior Geologist

337-257-8307

Ensolum, LLC

in f 



APPENDIX E

Final 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

Incident ID	nAPP2222753156
District RP	
Facility ID	fAPP2135653071
Application ID	

Release Notification

Responsible Party

Responsible Party: BTA Oil Producers, LLC	OGRID: 260297
Contact Name: Bob Hall	Contact Telephone: 432-682-3753
Contact email: bhall@btaoil.com	Incident # (assigned by OCD) nAPP2222753156
Contact mailing address: 104 S. Pecos St., Midland, TX 79701	

Location of Release Source

Latitude: 32.08958 Longitude: -103.56642

(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Rojo 18 ELL	Site Type: Tank Battery
Date Release Discovered: 8/14/2022	API# (if applicable) Nearest well:

Unit Letter	Section	Township	Range	County
F	34	25S	33E	Lea

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) 43 BBL	Volume Recovered (bbls) 35 BBL
	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

Fitting Failure. An ell on the bottom of the separator washed out. Produced water released under the vessel into unlined containment area. Recovered 35 BW with vacuum truck. Spill volume calculation is included.

State of New Mexico
Oil Conservation Division

Incident ID	nAPP2222753156
District RP	
Facility ID	fAPP2130022003
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?

☒ Yes ☐ No

If YES, for what reason(s) does the responsible party consider this a major release?

Yes – Release greater than 25 BBL.

If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?

Yes, by filing a Notice of Release (NOR) on the NMOCD Permitting website on 8/15/2022. The Incident ID listed above was assigned after the NOR was acknowledged by the NMOCD.

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.
- ☒ 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 not been undertaken, explain why:

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: **Bob Hall** Title: **Environmental Manager**

Signature: _____

Date: 8/15/2022

email: bhall@btaoil.com

Telephone: 432-682-3753

OCD Only

Received by: Jocelyn Harimon

Date: 08/15/2022

Location Rojo #18 Separator

API #

Spill Date 8/14/2022

Spill Dimensions

ENTER - Length of Spill

 feet

ENTER - Width of Spill

 feet

ENTER - Saturation Depth of Spill

 inches

ENTER - Porosity Factor

 decimal**Oil Cut - Well Test / Vessel Throughput or Contents**

Oil

Water

Calculated Oil Cut

Volume Recovered in Truck / Containment

ENTER - Recovered Oil

 BBL

ENTER - Recovered Water

 BBL**Calculated Values**

Release of Oil in Soil - Unrecovered

calculated
 BBL

Release of Water in Soil - Unrecovered

 BBL

Unrecovered Total Release

 BBL**Calculated Values**

Total Release of Oil

calculated
 BBL

Total Release of Water

 BBL

Total Release

 BBL

Types of Soil	Porosity Factor
Gravel	0.25
Sand	0.20
Clay/silt/sand Mix	0.15
Clay	0.05
Caliche	0.03
Unknown	0.25

(Length X Width X Depth X 1 ft/12 in) X Porosity5.615 ft³ / BBL

X

Oil Cut
(or Water Cut)

Rojo 18 ELL
8/14/2022

Incident #nAPP2222753156



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 134191

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 134191
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
jharimon	None	8/15/2022

Incident ID	nAPP2222753156
District RP	
Facility ID	fAPP2130022003
Application ID	

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?	<u>>100</u> (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" 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.


Form C-141

Page 4

State of New Mexico
Oil Conservation Division

Incident ID	nAPP2222753156
District RP	
Facility ID	fAPP2130022003
Application ID	

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: Bob Hall Title: Environmental Manager
Signature:  Date: 2/14/2023
email: bhall@btaoil.com Telephone: 432-312-2203

OCD Only

Received by: _____ Date: _____

Form C-141

State of New Mexico
Oil Conservation Division

Page 5

Incident ID	nAPP2222753156
District RP	
Facility ID	fAPP2130022003
Application ID	

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.

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: Bob Hall Title: Environmental Manager
Signature:  Date: 2/14/2023
email: bhall@btaoil.com Telephone: 432-312-2203

OCD Only

Received by: _____ Date: _____

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: _____ Date: _____

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	nAPP2123047003
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party: BTA Oil Producers, LLC	OGRID: 260297
Contact Name: Bob Hall	Contact Telephone: 432-682-3753
Contact email: bhall@btaoil.com	Incident # (assigned by OCD)
Contact mailing address: 104 S. Pecos St., Midland, TX 79701	

Location of Release Source

Latitude: 32.08975 Longitude: -103.56641

(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Rojo 18/19 & 38/39 Tank Battery	Site Type: Tank Battery
Date Release Discovered: 8/17/2021	API# (if applicable) Nearest well: Rojo 7811 34-27 Federal #019H API #30-025-44298

Unit Letter	Section	Township	Range	County
E	34	25S	33E	Lea

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 checked="" type="checkbox"/> Crude Oil	Volume Released (bbls) 8 BBL	Volume Recovered (bbls) 6 BBL
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 17 BBL	Volume Recovered (bbls) 14 BBL
	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

Piping Failure.


A piping tee connected under the separator for the Rojo 34-27 Federal #019H washed out and allowed a release of oil and water from the separator onto the caliche pad area surrounding the production equipment. A total of 25 BBL fluid (8 BO + 17 BW) was released. A vacuum truck was used to recover a total of 20 BBL fluid (6 BO + 14 BW).
(See attached spill calculation spreadsheet.)

Incident ID	nAPP2123047003
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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 spill volume was at least 25 BBL, which the NMOCD Rules define as a major release.
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? Yes, a Notification of Release was filed via the NMOCD E-Permitting System on 8/18/2021. The release was assigned Incident #	

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:	
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: Bob Hall Title: Environmental Manager	
Signature: 	Date: 8/18/2021
email: bhall@btaoil.com	Telephone: 432-682-3753
<u>OCD Only</u>	
Received by: Ramona Marcus	Date: 8/20/2021

NAPP2123047003

Location Rojo 34-27 Fed Com 18/19 & 38/39 Tank Battery
API # 30-025-44298
Spill Date 8/17/2021

Spill Dimensions

ENTER - Length of Spill feet
ENTER - Width of Spill feet
ENTER - Saturation Depth of Spill inches
ENTER - Porosity Factor decimal

Oil Cut - Well Test / Vessel Throughput or Contents

Oil
 Water
 Calculated Oil Cut

Volume Recovered in Truck / Containment

ENTER - Recovered Oil BBL
ENTER - Recovered Water BBL

Calculated Values

Release of Oil in Soil - Unrecovered BBL
 Release of Water in Soil - Unrecovered BBL
 Unrecovered Total Release BBL

Calculated Values

Total Release of Oil BBL
 Total Release of Water BBL
 Total Release BBL

Types of Soil	Porosity Factor
Gravel	0.25
Sand	0.20
Clay/silt/sand Mix	0.15
Clay	0.05
Caliche	0.03
Unknown	0.25

(Length X Width X Depth X 1 ft/12 in) X Porosity
 5.615 ft³ / BBL

X

Oil Cut
 (or Water Cut)

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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 43000

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 43000
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
marcus	None	8/20/2021

Incident ID	nAPP2123047003
District RP	
Facility ID	
Application ID	

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?	<u>>100</u> (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" 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.


Form C-141

State of New Mexico
Oil Conservation Division

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Incident ID	nAPP2123047003
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Printed Name: Bob Hall Title: Environmental Manager
Signature:  Date: 2/14/2023
email: bhall@btaoil.com Telephone: 432-312-2203

OCD Only

Received by: Jocelyn Harimon Date: 02/14/2023

Form C-141

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State of New Mexico
Oil Conservation Division

Incident ID	nAPP2123047003
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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: Bob Hall Title: Environmental ManagerSignature:  Date: 2/14/2023email: bhall@btaoil.com Telephone: 432-312-2203**OCD Only**Received by: Jocelyn Harimon Date: 02/14/2023☐ Approved ☒ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral ApprovedSignature:  Date: 02/24/2023

District I
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Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 186158

CONDITIONS

Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701	OGRID: 260297
	Action Number: 186158
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
jnobui	Remediation Plan Approved with Conditions. During excavation activities, sidewall samples should be delineated to 600 mg/kg for chlorides and 100 mg/kg for TPH to define the edge of the release, regardless of depth to groundwater.	2/24/2023