



June 6, 2023

New Mexico Oil Conservation Division

New Mexico Energy, Minerals, and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**Re: Remediation Work Plan
Rojo AE 7811 JV-P Fed 001H
Incident Number NCH1836251271
Lea County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of BTA Oil Producers, LLC (BTA), has prepared the following *Remediation Work Plan (Work Plan)* to document remedial activities completed to date at the Rojo AE 7811 JV-P Fed 001H (Site) and propose additional remedial actions based on deficiencies documented by the New Mexico Oil Conservation Division (NMOCD) in their denial email dated March 3, 2020. The following *Work Plan* proposes to collect the appropriate number of confirmation floor and sidewall soil samples that were not completed in December 2018 as well as collect lateral delineation soil samples to verify the lateral extent of the release.

SITE DESCRIPTION AND RELEASE SUMMARY

The Site is located in Unit D, Section 27, Township 25 South, Range 33 East, in Lea County, New Mexico (32.107610°, -103.56410°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM).

On December 2, 2018, a dump valve froze into a closed position on a separator, causing the vessel to pressurize. The high-pressure relief valve opened, as designed, to prevent rupture of the vessel and incoming flow lines, resulting in the release of approximately 350 barrels (bbls) of crude oil and 35 bbls of produced water onto the well pad and eastern pasture. A vacuum truck was dispatched to the Site to recover free-standing fluids; approximately 200 bbls of crude oil and 20 bbls of produced water were recovered. BTA reported the release immediately to the NMOCD via email on December 2, 2018, and submitted a Release Notification Form C-141 (Form C-141) on December 4, 2018. The release was assigned Incident Number NCH1836251271.

On December 2, 2018, Cajun Energy was retained to remediate the Site, which included the excavation of 5,430 cubic yard of stained soil and soil with elevated field screening results. Following excavation activities, Cajun Energy collected 10 discrete soil samples (SP1 through SP10) at depths ranging from 2 feet to 3 feet below ground surface (bgs). The excavation extent and soil sample locations are depicted on Figure 2. A Site Activities & Backfill Request report was submitted to the NMOCD on March 4, 2019, describing remedial actions and requesting closure of Incident Number NCH1836251271. The report is included as Appendix A.

BTA Oil Producers, LLC
Remediation Work Plan
Rojo AE 7811 JV-P Fed 001H

The NMOCD denied closure on March 3, 2020, via email based on the following deficiencies:

- *Soil samples were collected from only 10 points within the excavation spanning an area of more than 75,000 square feet. Please see 19.15.29.12 D. Closure Requirements. Each samples should not represent more than 200 square feet unless a sampling plan has already been submitted to and approved by the division.*
- *Sidewall samples were not collected to confirm the horizontal extents of the release were addressed.*
- *Depth to groundwater is not adequately identified. When nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, and data should be no more than 25 years old, and well construction information should be provided. If evidence of ground water within a ½ mile radius of the site cannot be provided, impacted soils will need to meet Table 1 Closure Criteria for ground water at a depth of 50 feet or less.*
- *The Closure page for the C-141 was not included with the report.*

The following sections will address the deficiencies described above in order to comply with Title 19, Chapter 15, Part 29 (19.15.29) of the New Mexico Administrative Code (NMAC).

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 19.15.29 NMAC. Results from the characterization desktop review are presented on 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 between 50 feet to 100 feet below ground surface (bgs) based on the closest groundwater well data. The closest groundwater well with depth to groundwater data is New Mexico Office of the State Engineer (NM OSE) well number C-4698-POD 1, located approximately 579 feet west of the Site. On January 3, 2023, a field geologist logged and described soils continuously to a total depth of 60 feet bgs due to drilling refusal. The borehole was left open for over 72 hours to allow for potential slow infill of groundwater. After the 72-hour waiting period without observing groundwater, it was confirmed that groundwater beneath the Site is greater than 60 feet bgs. The borehole was properly abandoned using drill cuttings and hydrated bentonite chips. Based on the soil boring, depth to groundwater at the Site is confirmed to be between 50 feet and 100 feet bgs. All wells used for depth to water determination are depicted on Figure 1 and the referenced well records are included in Appendix B.

The closest continuously flowing or significant watercourse to the Site is an irrigation canal, located approximately 6,792 feet southeast 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 (high potential karst designation area). Site receptors are identified on Figure 1.

Based on the results of the Site Characterization, the following NMOCD Table I Closure Criteria (Closure Criteria) apply for the following chemicals of concern (COCs):

- 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

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- Total TPH: 2,500 mg/kg
- Chloride: 10,000 mg/kg

A reclamation requirement of 600 mg/kg chloride and 100 mg/kg TPH will be applied to the top 4 feet of the pasture area per 19.15.29.13.D (1) NMAC for the top 4 feet of areas that will be immediately reclaimed following remediation.

PROPOSED REMEDIAL ACTIONS

Based on the NMOCD's 2020 denial, Ensolum proposes the following remedial actions to address the deficiencies:

- Ensolum proposes to evaluate the lateral release extent based on information provided on the Form C-141 and document release extent. Ensolum will collect soil samples at 0.5 feet bgs outside of the release extent to confirm the lateral definition of the release. Tentative delineation soil sample locations are presented on Figure 2. The actual locations of the soil samples will be dependent on Site observations and may be adjusted once onsite.
- All soil samples will be field screened for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID) and chloride using Hach® chloride QuanTab® test strips. Field screening results and observations were logged on lithologic/soil sampling logs. The soil sample locations will be mapped utilizing a handheld Global Positioning System (GPS) unit. Photographic documentation will be completed during the Site visit.
- Soil samples will be 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 will be transported under strict chain-of-custody procedures to Cardinal Laboratories (Cardinal) in Hobbs, New Mexico, for analysis of the following 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.
- Ensolum will collect 5-point composite confirmation soil samples from the floor of the excavation per 19.15.29.12.D NMAC with the following variance request: based on the overall aerial extent of the release and subsequent excavation (greater than 75,000 square feet), Ensolum is requesting a variance in sample frequency from every 200 square feet to every 700 square feet. This would reduce the sample quantity from approximately 627 floor soil samples to 179 samples. Ensolum believes this frequency will adequately confirm the presence or absence of soil impacts and/or waste-containing soil (soil in off-pad areas that does not meet the reclamation requirements).
- Based on information provided by Cajun Energy, the excavation was completed to approximately 1-foot bgs in the vicinity of soil samples SP1 and SP2 and to 2 feet bgs in the rest of the excavation. As such, confirmation soil samples will be collected at those depths as shown on Figure 2.
- Ensolum will collect 5-point composite confirmation soil samples from the sidewalls of the excavation per 19.15.29.12.D NMAC at a frequency of one every 200 square feet. Based on the final depths of the excavation (between 1-foot and 2 feet bgs), approximately 11 sidewall soil samples will be collected.
- The 5-point composite samples will be collected by placing five equivalent aliquots of soil into a 1-gallon, resealable plastic bag and homogenizing the samples by thoroughly mixing. The

BTA Oil Producers, LLC
Remediation Work Plan
Rojo AE 7811 JV-P Fed 001H

confirmation floor and sidewall soil samples will be handled and analyzed following the same procedures as described above.

- Depth to water has been adequately assessed as noted in the Site Characterization section and as such, the appropriate Closure Criteria has been determined and will be used for confirmation sampling comparisons on pad and the reclamation requirements will be utilized off pad in the top 4 feet.
- The Form C-141 for remediation plans has been included in Appendix C of this *Work Plan*.

BTA will complete the delineation and confirmation soil sampling activities described above within 90 days of the date of approval of this *Work Plan* by the NMOCD. If laboratory analytical results indicate concentrations of all COCs are in compliance with the Closure Criteria and/or the reclamation requirement and it is determined that impacted soil was satisfactorily removed, a *Closure Request* will be prepared and submitted to the NMOCD for concurrence. If laboratory analytical results do indicate the presence of impacted soil and/or waste-containing soil, BTA will submit a *Revised Remediation Work Plan (RRWP)* to outline additional remedial actions to addressed impacts.

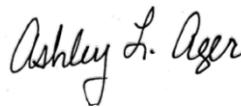
BTA believes the scope of work described above will meet requirements set forth in 19.15.29.12 NMAC and are protective of human health, the environment, and groundwater. As such, BTA respectfully requests approval of this *Work Plan* from the NMOCD.

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



Ashley Ager, M.S., PG
Principal

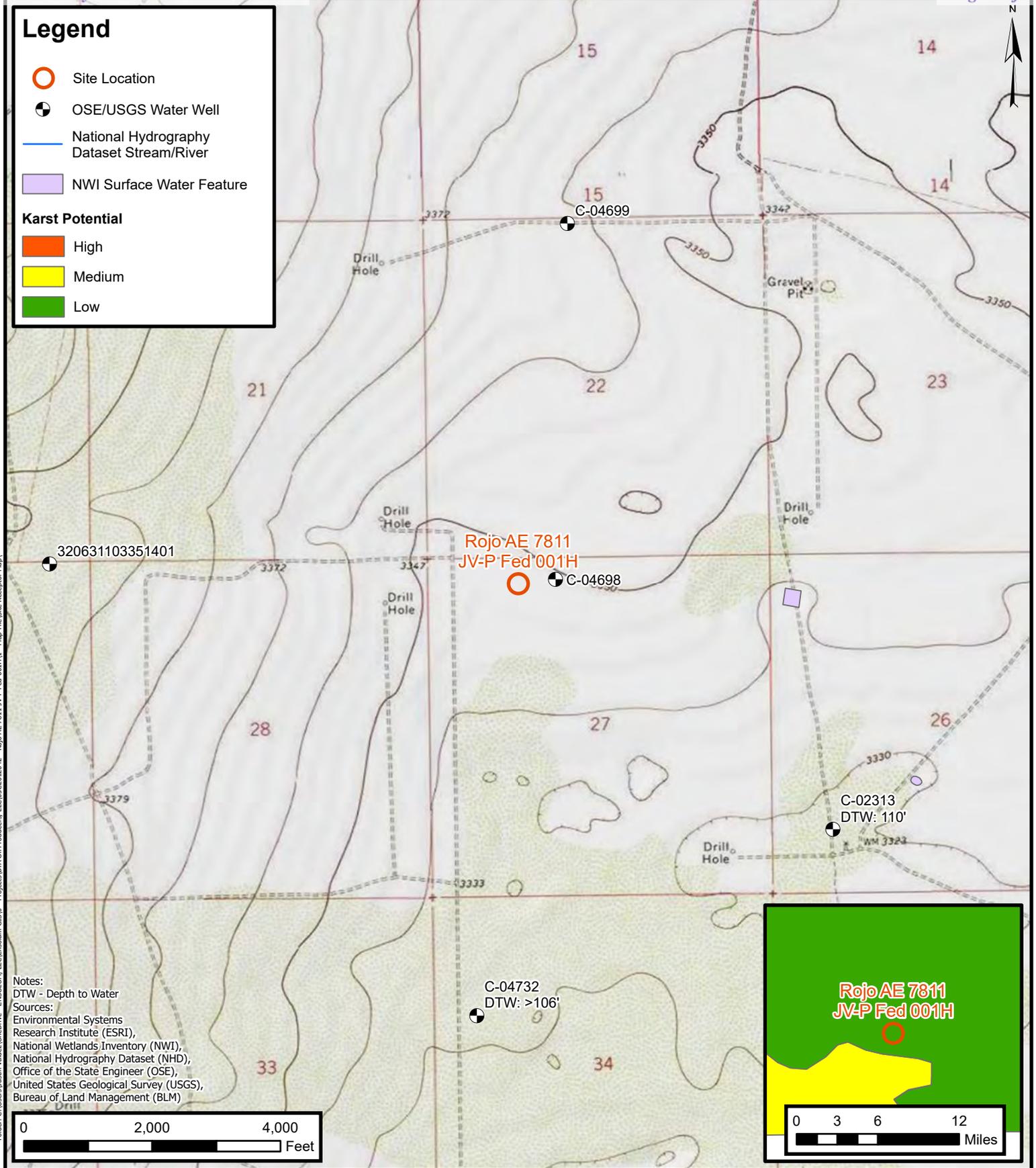
cc: Kelton Beard, BTA
Nathan Sirgo, BTA
Bureau of Land Management

Appendices:

- Figure 1 Site Receptor Map
- Figure 2 Proposed Soil Sample Locations
- Appendix A Previous Closure Report
- Appendix B Referenced Well Records
- Appendix C Form C-141



FIGURES



Legend

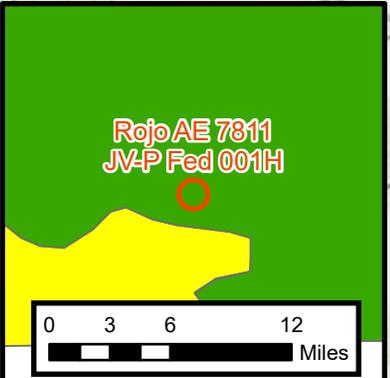
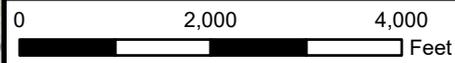
- Site Location
- OSE/USGS Water Well
- National Hydrography Dataset Stream/River
- NWI Surface Water Feature

Karst Potential

- High
- Medium
- Low

Notes:
DTW - Depth to Water

Sources:
Environmental Systems Research Institute (ESRI),
National Wetlands Inventory (NWI),
National Hydrography Dataset (NHD),
Office of the State Engineer (OSE),
United States Geological Survey (USGS),
Bureau of Land Management (BLM)

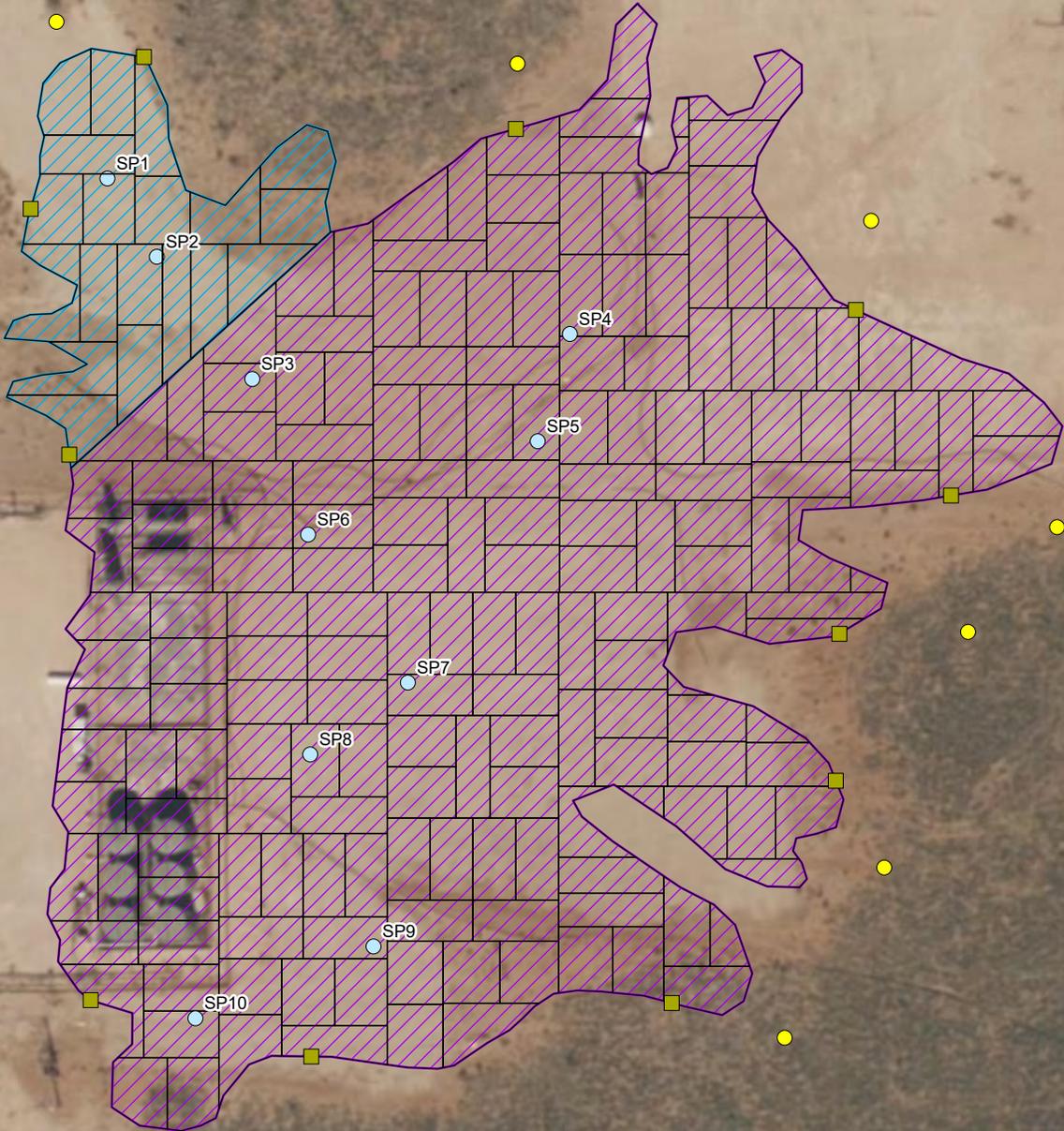


Site Receptor Map
 BTA Oil Producers, LLC
 Rojo AE 7811 JV-P Fed 001H
 Incident Number: nCH1836251271
 Unit D, S27, T25S, R33E
 Lea County, New Mexico

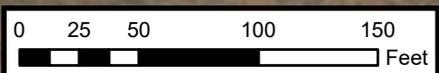
FIGURE
1

Legend

- Proposed Lateral Delineation Soil Sample Location
- Existing Soil Sample Location
- Proposed 5-Point Composite Sidewall Sampling Area
- Proposed 5-Point Composite Sampling Area at 1-foot bgs
- Proposed 5-Point Composite Sampling Area at 2-feet bgs
- 700-square foot Grid



Notes:
bgs = below ground surface



Sources: Environmental Systems Research Institute (ESRI)

ENSOLUM
Environmental, Engineering and
Hydrogeologic Consultants

Proposed Soil Sample Locations

BTA Oil Producers, LLC
Rojo AE 7811 JV-P Fed 001H
Incident Number: nCH1836251271
Unit D, S27, T25S, R33E
Lea County, New Mexico

FIGURE 2



APPENDIX A

Previous Closure Report

From: [Eads, Cristina, EMNRD](#)
To: ["BGrimes@btaoil.com"](mailto:BGrimes@btaoil.com)
Cc: [Mike EMNRD Bratcher \(mike.bratcher@state.nm.us\)](mailto:mike.bratcher@state.nm.us); [Robert EMNRD Hamlet \(Robert.Hamlet@state.nm.us\)](mailto:Robert.Hamlet@state.nm.us); [Victoria EMNRD Venegas \(Victoria.Venegas@state.nm.us\)](mailto:Victoria.Venegas@state.nm.us)
Subject: Closure Denial - Incident nCH183625127
Date: Tuesday, March 3, 2020 3:00:00 PM

Ben,

The OCD has denied the submitted Closure Report C-141 for incident # NCH1836251271 for the following reasons:

- Soil samples were collected from only 10 points within the excavation spanning an area of more than 75,000 square feet. Please see **19.15.29.12 D. Closure Requirements**. Each samples should not represent more than 200 square feet unless a sampling plan has already been submitted to and approved by the division.
- Sidewall samples were not collected to confirm the horizontal extents of the release were addressed.
- Depth to groundwater is not adequately identified. When nearby wells are used to determine depth to groundwater, **the wells should be no further than ½ mile away from the site, and data should be no more than 25 years old**, and well construction information should be provided. If evidence of ground water within a ½ mile radius of the site cannot be provided, impacted soils will need to meet Table 1 Closure Criteria for ground water at a depth of 50 feet or less.
- The Closure page for the C-141 was not included with the report.

Please review and make the required corrections prior to resubmitting through the fee portal.

Thanks,

Cristina Eads

Environmental Bureau

EMNRD – Oil Conservation Division

1220 South St. Francis Drive

Santa Fe, New Mexico 87505

505.476.3084

email: Cristina.Eads@state.nm.us

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Bob Hall

From: Bob Hall
Sent: Thursday, March 07, 2019 1:08 PM
To: 'jamos@blm.gov'; Weaver, Crystal; 'emnrd-ocd-district1spills@state.nm.us'
Cc: 'Michael Alves'
Subject: 1RP-5295 Site Activities Report and Request for Backfilling
Attachments: 1RP-5295.pdf; FINAL_Rojo AE Backfill Request.pdf

Please find attached a site activities report and a request for backfilling the subject site that was prepared by Michael Alves with Cajun Energy.

If you have questions or concerns, Michael and I are available at any time that is convenient for you.

Thanks,
Bob.

Bob Hall
BTA Oil Producers, LLC
104 S. Pecos Street
Midland, TX 79701

Closure Denied - CE
03/03/2020

bhall@btaoil.com
(432) 682-3753 (office)
(432) 312-2203 (cell)



From: Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>
Sent: Friday, December 28, 2018 4:09 PM
To: Bob Hall <BHall@btaoil.com>; stucker@blm.gov
Cc: Michael Alves <mike@cajun-energy.com>; Ben Grimes <BGrimes@btaoil.com>
Subject: RE: Rojo AE Battery_Signed Release Notification Form C-141 for Dec 2 2018 Release

***** EXTERNAL EMAIL - Please use caution and **DO NOT** open attachments or click links from unknown or unexpected emails. *****

Ms. Hall:

Notes

1. Dated, geo-referenced photo documentation for verification that the initial response activities have been employed to contain the release is requested.
2. 19.15.29.13 NMAC, regulations of corresponding agencies supersede NMOCD's.

The 1RP for this incident is

| | | | | | | | |
|------|------------|---|---------|----------------------------|--------------|-------------|----|
| 5295 | 12/28/2018 | A | BTA oil | Rojo AE 7811 JV-p Fed 001H | 30-025-43476 | 25S-33E-27D | 12 |
|------|------------|---|---------|----------------------------|--------------|-------------|----|

Please remember to include this 1RP identifier to all communications. Delineate and remediate per regulation NMAC 19.15.29 available at <http://164.64.110.134/parts/title19/19.015.0029.html>. Mind the timelines for submittal of requisite information.

Please be advised that NMOCD recommends a completed site characterization/delineation report be reviewed or approved by NMOCD BEFORE any significant remediation work towards closure.

Thanks,
 Christina Hernandez
 EMNRD-OCD
 Environmental Specialist
 1625 N. French Drive
 Hobbs, NM 88240
 575-393-6161 x111
Christina.Hernandez@state.nm.us

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Bob Hall <BBHall@btaoil.com>
Sent: Tuesday, December 4, 2018 3:54 PM
To: stucker@blm.gov; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>
Cc: Michael Alves <mike@cajun-energy.com>; Ben Grimes <BGrimes@btaoil.com>
Subject: [EXT] Rojo AE Battery_Signed Release Notification Form C-141 for Dec 2 2018 Release

Please find attached a scan of the signed Release Notification for the Rojo AE 7811 JV-P Federal 001H (closest well) Tank Battery spill that took place on 12/2/2018.

BTA will continue to work with Mike at Cajun Energy to execute the Site Assessment, Remediation and Closure activities at this spill site.

If you have any questions or concerns, please call me anytime.

Bob.

Bob Hall
BTA Oil Producers, LLC
104 S. Pecos Street
Midland, TX 79701

(432) 682-3753 (office)
(432) 312-2203 (cell)

BTA OIL PRODUCERS

03/04/2019



Site Activities

&

Backfill Request

1RP-5295

Rojo AE 7811 JV-P Federal 001H (Closest Well)

UL-D, Sec. 27-T25S-R33E

API # 30-025-43476

Prepared by:
Michael Alves
Environmental Department
Cajun Energy
831 East Highland
Hobbs, NM 88240
Phone: (575) 631-4310
mike@cajun-energy.com

BTA OIL PRODUCERS

03/04/2019

BTA Oil Producers has retained Cajun Energy to address environmental issues for the site detailed herein.

The Rojo AE 7811 JV-P Federal 001H (API # 30-025-43476) is the closest well to this Production Facility and Tank Battery located west of Jal, Lea County, NM. According to the New Mexico Office of the State Engineer, the Minimum Depth to Water is 214 feet. (Appendix II).

As written in the C-141 filed on December 4, 2018 with the BLM/NMOCD, the release was caused by a frozen dump valve resulting in a vessel pressuring up and blowing oil and produced water out of the "pop off". (Appendix I) An estimated 350 BBL of oil and 35 BBL of produced water was released, of those volumes, 200 BBL of oil and 20 BBL of produced water were recovered. Since the spill volume was greater than 25 BBL, this spill is classified as a major release in accordance with NMOCD Rules. Subsequently, the release was assigned Incident #NCH1836251271 and District RP #1RP-5295.

On December 2, 2018, the day of the release, Cajun Energy was called to the location to perform emergency spill response activities. Cajun Energy made an emergency "One Call" dig alert and started spill remediation. Starting on December 2, 2018, the immediate remediation of the site commenced by excavating visibly soaked soil and stockpiling the soil onto a 6ml plastic liner. This timely effort stopped the downward migration of oil.

Excavation, stockpiling and disposal activities were performed through mid-December. From mid-December to mid-January, the primary activity was removal of the remaining impacted soil for disposal. A total of 5,430 cubic yards of soil were sent for disposal at Sundance Services, Inc. in Eunice, NM.

During excavation activities, samples for field testing were taken from 10 locations (SP1 through SP10) at points from surface down to 2' BGS (below ground surface). (Appendix III) Field testing on the samples used a titration process to estimate total chloride concentration and a PID meter was used to indicate the presence of volatile hydrocarbons in soil (inferring a concentration of TPH).

The excavation activity began with an initial scraping of up to 1' of obvious oil-soaked soil in the area of sample locations SP1 through SP10. Following the initial scraping, soil near sample locations SP1 and SP2 was left as is, due to field screening results and as confirmed with lab results. Using field screening and visual cues, an additional 1' of obviously impacted oil-soaked soil was removed in the vicinity of sample locations SP3 through SP10, resulting in a total of 2' BGS depth excavated from those portions of the spill area. (Appendix V)

When a soil sample at a location was field tested and indicated the presence of contaminant concentrations at a level below clean-up requirements, an additional soil

BTA OIL PRODUCERS

03/04/2019

sample was taken at the same location at a point that was one foot deeper as confirmation. The second "deeper" sample was then taken to Cardinal Labs for lab analysis. Sample locations SP1 and SP2 were below clean-up requirements at their respective points located between surface and 1' BGS. All samples taken from sample locations SP3 through SP10 were below clean-up requirements at each point located between 1' and 2' BGS. (Appendix VI).

Inside of the lined secondary containment area, the tanks and equipment were washed as was the interior of the secondary containment. All waste water was taken to a BTA SWD for proper disposal.

At the completion of the emergency response activity at the present site, all impacted soil containing concentrations of TPH and Chlorides above the regulatory action levels has been removed. Field testing of bottom soil samples defined the limits of the impacted area and those limits are confirmed with lab analyses of additional soil samples at points located generally 1' deeper.

On behalf of BTA Oil Producers, Cajun Energy respectfully requests approval to backfill the site herein. The proposed work to be conducted by Cajun Energy will be to backfill and compact the site using clean imported soil and caliche. The surrounding area will be contoured to the excavation and then seeded with a native blend of seed, which in this case is LPC. The seed blend will be free of noxious weeds.

A site map is included in the Appendices and pictures (Appendix IV) have been included to provide additional information about the release and the scope of the emergency response activities. A closure report will be submitted to BLM/NMOCD along with all supporting documentation to provide closure to this release.

If you have any questions or concerns, please feel free to contact me.

Respectfully,



Michael Anthony Alves
Cajun Energy – General Manager
575-631-4310
mike@cajun-energy.com

| | |
|--------------|--------------------|
| Appendix I | C-141 |
| Appendix II | Groundwater Search |
| Appendix III | Site Map |
| Appendix IV | Site Photos |
| Appendix V | Sample Table |
| Appendix VI | Lab Data |

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03/04/2019

Appendix I

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 | NCH1836251271 |
| District RP | 1RP-5295 |
| Facility ID | |
| Application ID | pCH1836251636 |

Release Notification

Responsible Party

| | | | |
|-------------------------|-------------------------------------|-------------------|--|
| Responsible Party | BTA Oil Producers | OGRID | 260297 |
| Contact Name | Ben Grimes | Contact Telephone | (432) 682-3753 |
| Contact email | bgrimes@btaoil.com | Incident # | NCH1836251271 ROJO AE 7811 JV-P FED 001H @ 30-025-43476 |
| Contact mailing address | 104 S. Pecos St., Midland, TX 79701 | | |

Location of Release Source

Latitude 32.107610 Longitude -103.56410
(NAD 83 in decimal degrees to 5 decimal places)

| | | | |
|-------------------------|---|----------------------|--------------|
| Site Name | Rojo AE 7811 JV-P Fed 001H (closest well) | Site Type | Tank Battery |
| Date Release Discovered | 12/02/2018 | API# (if applicable) | 30-025-43476 |

| Unit Letter | Section | Township | Range | County |
|-------------|---------|----------|-------|--------|
| D | 27 | 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) | 350 BBL | Volume Recovered (bbls) | 200 BBL |
| <input checked="" type="checkbox"/> Produced Water | Volume Released (bbls) | 35 BBL | Volume Recovered (bbls) | 20 BBL |
| | Is the concentration of dissolved chloride in the produced water >10,000 mg/l? | | <input type="checkbox"/> Yes <input checked="" 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

A dump valve froze into a closed position on the separator, causing the vessel to pressure up and the high pressure relief valve (pop-off) to open to prevent rupture of the vessel and the incoming lines.

Form C-141

State of New Mexico
Oil Conservation Division

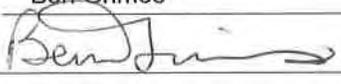
Page 2

| | |
|----------------|--|
| Incident ID | |
| District RP | |
| Facility ID | |
| Application ID | |

| | |
|--|--|
| 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 greater than 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)? Email sent to Shelly Tucker, BLM, and Christina Hernandez, NMOCD, by Michael Alves, Cajun Energy, on 12/2/2018 at 9:02 PM. | |

Initial Response

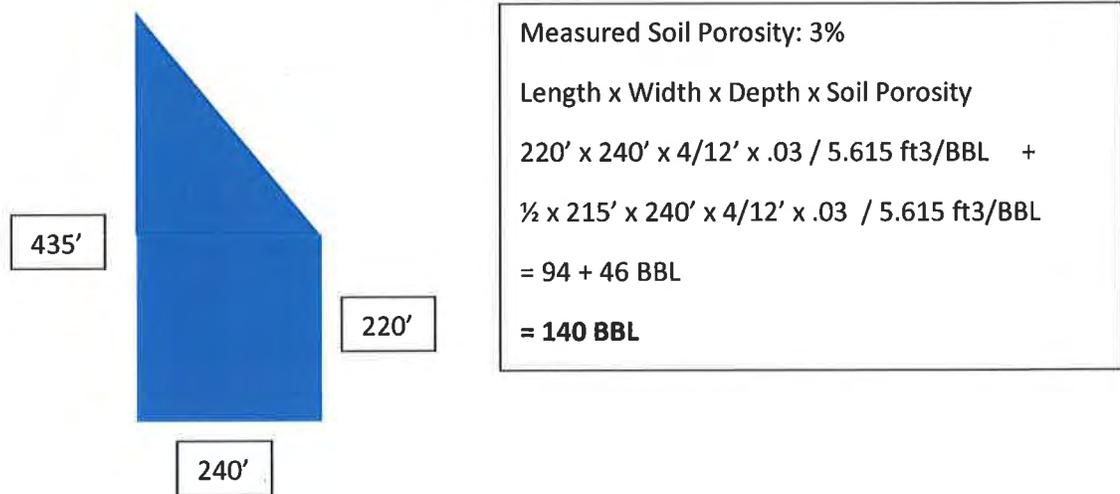
The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

| | |
|--|----------------------------------|
| <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: <u>Ben Grimes</u> | Title: <u>Production Manager</u> |
| Signature: <u></u> | Date: <u>12/4/18</u> |
| email: <u>bgrimes@btaoil.com</u> | Telephone: <u>(432) 682-3753</u> |
| <u>OCD Only</u> | |
| Received by: _____ | Date: _____ |

Release Notification for 12/2/2018 Incident

Calculations for Rojo AE 7811 JV-P Federal 001H (nearest well)

- The impacted area outside of the tank battery containment was calculated as follows:



- Plus: 220 BBL was contained and recovered from the tank battery secondary containment area.
- Plus: Estimated 25 BBL fluid remains inside secondary containment spread across the top of the tanks, vessels and piping.

Total volume reported: 385 BBL

At 10% Water Cut, Volumes in this Release Notification estimate are:

Crude Oil: 350 BBL

Produced Water: 35 BBL

BTA OIL PRODUCERS

03/04/2019

Appendix II

Groundwater Search



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced, O=orphaned, C=the file is closed)

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

(NAD83 UTM in meters)

(In feet)

| POD Number | POD Sub-Code | basin | County | Q 64 | Q 16 | Q 4 | Sec | Tws | Rng | X | Y | Distance | Depth Well | Depth Water | Water Column |
|-----------------------------------|--------------|-------|--------|------|------|-----|-----|-----|-----|--------|----------|----------|------------|-------------|--------------|
| J 00005 POD1 | J | LE | | 2 | 2 | 2 | 13 | 26S | 35E | 659200 | 3547174* | 23510 | 601 | 230 | 371 |
| J 00001 | J | LE | | 1 | 1 | 3 | 18 | 26S | 36E | 659416 | 3546374* | 23939 | 550 | 253 | 297 |
| J 00002 X3 | J | LE | | | 3 | 1 | 19 | 26S | 36E | 659536 | 3545067* | 24463 | 710 | 216 | 494 |
| J 00002 X2 | J | LE | | | 4 | 3 | 18 | 26S | 36E | 659929 | 3545879* | 24575 | 650 | 214 | 436 |
| J 00001 X | J | LE | | 2 | 4 | 1 | 19 | 26S | 36E | 660042 | 3545173* | 24905 | 640 | 250 | 390 |
| J 00027 POD1 | J | LE | | 1 | 2 | 2 | 30 | 26S | 36E | 660612 | 3543961 | 25858 | 571 | 285 | 286 |
| J 00033 POD1 | J | LE | | 2 | 4 | 2 | 30 | 26S | 36E | 660767 | 3543426 | 26200 | 551 | 250 | 301 |
| J 00034 POD1 | J | LE | | 2 | 4 | 2 | 30 | 26S | 36E | 660869 | 3543643 | 26214 | 506 | 250 | 256 |
| J 00035 POD1 | J | LE | | 2 | 4 | 2 | 30 | 26S | 36E | 660923 | 3543521 | 26309 | 506 | 250 | 256 |
| J 00004 POD1 | J | LE | | 4 | 1 | 3 | 29 | 26S | 36E | 661366 | 3542970 | 26928 | 604 | 270 | 334 |
| J 00004 CLW458813 | O | J | LE | | | 3 | 29 | 26S | 36E | 661392 | 3542882* | 26986 | 604 | 270 | 334 |
| J 00009 POD1 | J | LE | | | 4 | 4 | 09 | 26S | 36E | 663924 | 3547554* | 28016 | 175 | | |
| J 00008 POD1 | J | LE | | | 3 | 3 | 10 | 26S | 36E | 664327 | 3547560* | 28409 | 175 | | |
| J 00025 POD2 | J | LE | | 3 | 4 | 4 | 21 | 26S | 36E | 663984 | 3544155 | 28965 | 800 | | |

Average Depth to Water: **248 feet**
 Minimum Depth: **214 feet**
 Maximum Depth: **285 feet**

Record Count: 14

Basin/County Search:

Basin: Jal

UTMNAD83 Radius Search (in meters):

Easting (X): 636508.6

Northing (Y): 3553326

Radius: 30000

*UTM location was derived from PLSS - see Help

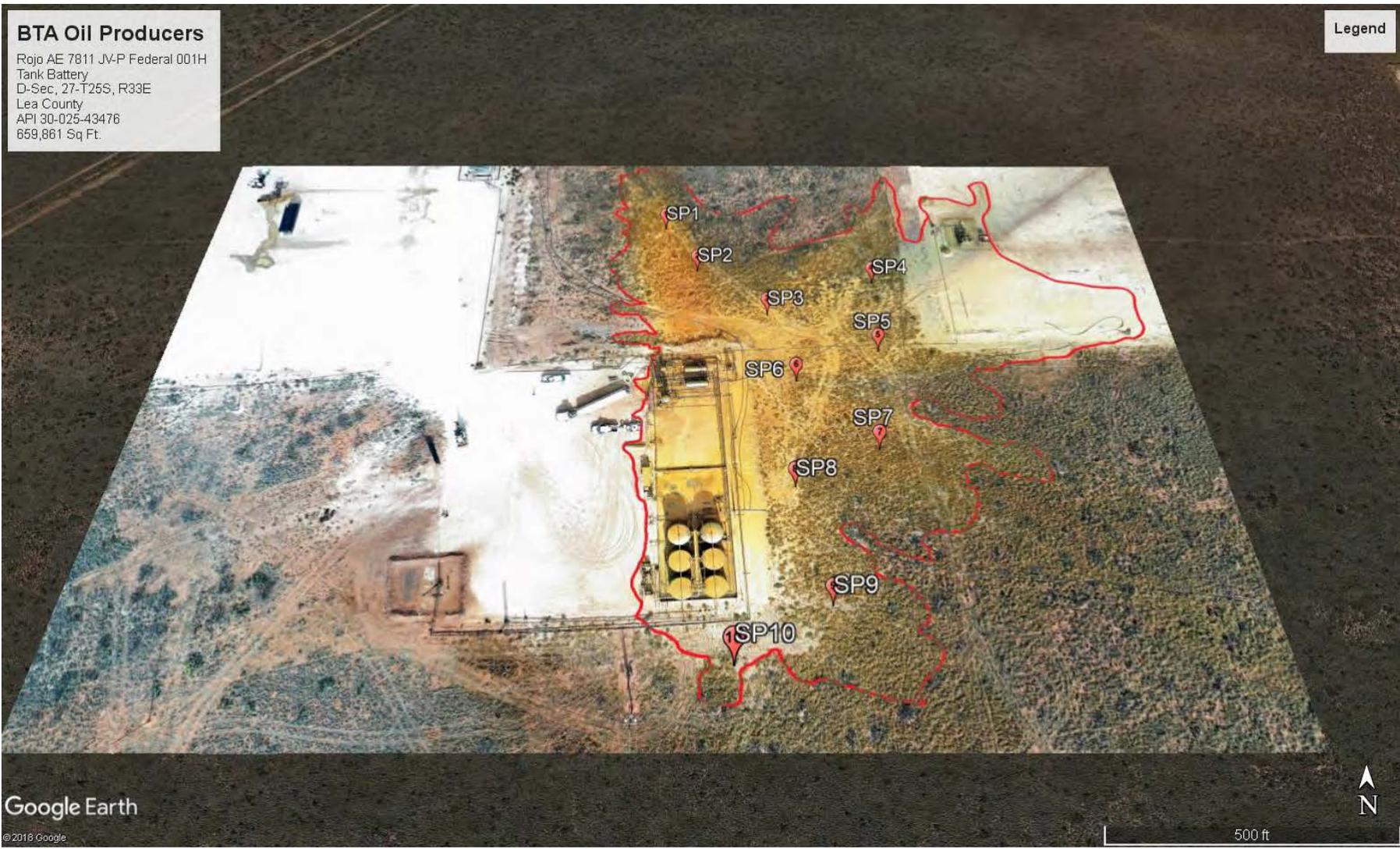
The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

BTA OIL PRODUCERS

03/04/2019

Appendix III

Site Map



BTA OIL PRODUCERS

03/04/2019

Appendix IV

Site Photos



Aerial View of spill



Spill Looking South



Spill Northeast View



Spill Looking Southeast



Spill Looking west



Spill looking southeast



Spill Looking west



Looking Northeast

BTA OIL PRODUCERS

03/04/2019



Clean-up



Clean-up



Clean-up



Clean-up



Clean-up

BTA OIL PRODUCERS

03/04/2019

Appendix V

Sample Table

Rojo AE Tank Battery Release - December 2, 2018
 OCD Tracking #: 1RP-5295

| Location | GPS Coordinates | Sample Date | Sample Depth (feet BGS) | Field Screening | | Laboratory Results | | | | | | | | | | |
|----------|-----------------|-------------|-------------------------|------------------|--------------------------|--------------------|-------------------|-----------------------|--------------|-----------------|-----------------|-----------------------|-----------------------|-----------------|-----------------|---------------------|
| | | | | PID Result (PPM) | Titration Result (mg/kg) | Chloride (mg/kg) | Total TPH (mg/kg) | TPH GRO + DRO (mg/kg) | BTEX (mg/kg) | Benzene (mg/kg) | Toluene (mg/kg) | Ethyl-benzene (mg/kg) | Total Xylenes (mg/kg) | TPH GRO (mg/kg) | TPH DRO (mg/kg) | TPH Ext DRO (mg/kg) |
| SP1 | | 12/6/18 | Surface | 30.0 | 224 | | | | | | | | | | | |
| SP1 | | 12/6/18 | 1 | 0 | 174 | | | | | | | | | | | |
| SP1 | | 12/6/18 | 2 | | | 64.0 | ND | ND | ND | ND | ND | ND | ND | ND | ND | ND |
| SP2 | | 12/6/18 | Surface | 30.9 | 274 | | | | | | | | | | | |
| SP2 | | 12/6/18 | 1 | 2.1 | 199 | | | | | | | | | | | |
| SP2 | | 12/6/18 | 2 | 0 | 249 | 48.0 | ND | ND | ND | ND | ND | ND | ND | ND | ND | ND |
| SP3 | | 12/6/18 | Surface | 0 | 224 | | | | | | | | | | | |
| SP3 | | 12/6/18 | 1 | 25.5 | 124 | | | | | | | | | | | |
| SP3 | | 12/6/18 | 2 | 0 | 399 | | | | | | | | | | | |
| SP3 | | 12/6/18 | 3 | 0 | 174 | 48.0 | ND | ND | ND | ND | ND | ND | ND | ND | ND | ND |
| SP4 | | 12/6/18 | Surface | 90.5 | 3,473 | | | | | | | | | | | |
| SP4 | | 12/6/18 | 1 | 104.5 | 499 | | | | | | | | | | | |
| SP4 | | 12/6/18 | 2 | 0 | 274 | | | | | | | | | | | |
| SP4 | | 12/6/18 | 3 | 0 | 199 | 16.0 | ND | ND | ND | ND | ND | ND | ND | ND | ND | ND |
| SP5 | | 12/6/18 | Surface | 99.5 | 449 | | | | | | | | | | | |
| SP5 | | 12/6/18 | 1 | 63.9 | 374 | | | | | | | | | | | |
| SP5 | | 12/6/18 | 2 | 0 | 299 | | | | | | | | | | | |
| SP5 | | 12/6/18 | 3 | 0 | 249 | 32.0 | ND | ND | ND | ND | ND | ND | ND | ND | ND | ND |
| SP6 | | 12/6/18 | Surface | 49.2 | 549 | | | | | | | | | | | |
| SP6 | | 12/6/18 | 1 | 78.2 | 474 | | | | | | | | | | | |
| SP6 | | 12/6/18 | 2 | 0 | 249 | | | | | | | | | | | |
| SP6 | | 12/6/18 | 3 | 0 | 199 | 32 | ND | ND | ND | ND | ND | ND | ND | ND | ND | ND |
| SP7 | | 12/6/18 | Surface | 1345 | 4,273 | | | | | | | | | | | |
| SP7 | | 12/6/18 | 1 | 434.9 | 624 | | | | | | | | | | | |
| SP7 | | 12/6/18 | 2 | 0 | 999 | | | | | | | | | | | |
| SP7 | | 12/6/18 | 3 | 0 | 624 | 320 | ND | ND | ND | ND | ND | ND | ND | ND | ND | ND |
| SP8 | | 12/6/18 | Surface | 227.5 | 2,824 | | | | | | | | | | | |
| SP8 | | 12/6/18 | 1 | 50.8 | 249 | | | | | | | | | | | |
| SP8 | | 12/6/18 | 2 | 3.4 | 224 | | | | | | | | | | | |
| SP8 | | 12/6/18 | 3 | 0 | 174 | ND | ND | ND | ND | ND | ND | ND | ND | ND | ND | ND |
| SP9 | | 12/6/18 | Surface | 361.8 | 249 | | | | | | | | | | | |
| SP9 | | 12/6/18 | 1 | 21.6 | 199 | | | | | | | | | | | |
| SP9 | | 12/6/18 | 2 | 0 | 174 | | | | | | | | | | | |
| SP9 | | 12/6/18 | 3 | 0 | 124 | 32.0 | ND | ND | ND | ND | ND | ND | ND | ND | ND | ND |

Rojo AE Tank Battery Release - December 2, 2018
 OCD Tracking #: 1RP-5295

| Location | GPS Coordinates | Sample Date | Sample Depth (feet BGS) | Field Screening | | Laboratory Results | | | | | | | | | | |
|----------|-----------------|-------------|-------------------------|------------------|--------------------------|--------------------|-------------------|-----------------------|--------------|-----------------|-----------------|----------------------|-----------------------|-----------------|-----------------|---------------------|
| | | | | PID Result (PPM) | Titration Result (mg/kg) | Chloride (mg/kg) | Total TPH (mg/kg) | TPH GRO + DRO (mg/kg) | BTEX (mg/kg) | Benzene (mg/kg) | Toluene (mg/kg) | Ethylbenzene (mg/kg) | Total Xylenes (mg/kg) | TPH GRO (mg/kg) | TPH DRO (mg/kg) | TPH Ext DRO (mg/kg) |
| SP10 | | 12/6/18 | Surface | 114.6 | 574 | | | | | | | | | | | |
| SP10 | | 12/6/18 | 1 | 13.9 | 424 | | | | | | | | | | | |
| SP10 | | 12/6/18 | 2 | 0 | 249 | | | | | | | | | | | |
| SP10 | | 12/6/18 | 3 | 0 | 199 | 32.0 | ND | ND | ND | ND | ND | ND | ND | ND | ND | ND |

NMOCD Table 1 - Closure Criteria for Soils Impacted by a Release (19.15.29.12)

Minimum Depth to GW less than 10,000 mg/l TDS

| | | | | | |
|------------|--------|-------|-------|----|----|
| <= 50' | 600 | 100 | - | 50 | 10 |
| 51' - 100' | 10,000 | 2,500 | 1,000 | 50 | 10 |
| >100' | 20,000 | 2,500 | 1,000 | 50 | 10 |

Reporting Limits:

Chlorides: 16.0 mg/kg

Benzene, Toluene, Ethylbenzene: 0.050 mg/kg for each analyte

Total Xylenes: 0.150 mg/kg

Total BTEX: 0.300 mg/kg

GRO (C6 - C10), DRO (>C10 - C28), Ext DRO (>C28 - C36): 10.0 mg/kg for each analyte

BTA OIL PRODUCERS

03/04/2019

Appendix VI

Lab Data

SP-1+Z



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

January 22, 2019

BOB HALL

BTA Oil Producers

103 South Pecos

Midland, TX 79701

RE: ROJO AE #001

Enclosed are the results of analyses for samples received by the laboratory on 01/17/19 13:40.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-18-11. 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,

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

BTA Oil Producers
 BOB HALL
 103 South Pecos
 Midland TX, 79701
 Fax To: (432) 683-0312

Received: 01/17/2019
 Reported: 01/22/2019
 Project Name: ROJO AE #001
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 01/17/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: SP 1 @ 2' (H900165-01)

| BTEX 8021B | | mg/kg | | Analyzed By: MS | | | | | |
|----------------|--------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Benzene* | <0.050 | 0.050 | 01/21/2019 | ND | 2.15 | 108 | 2.00 | 2.09 | |
| Toluene* | <0.050 | 0.050 | 01/21/2019 | ND | 2.24 | 112 | 2.00 | 3.71 | |
| Ethylbenzene* | <0.050 | 0.050 | 01/21/2019 | ND | 2.29 | 115 | 2.00 | 9.35 | |
| Total Xylenes* | <0.150 | 0.150 | 01/21/2019 | ND | 6.64 | 111 | 6.00 | 6.56 | |
| Total BTEX | <0.300 | 0.300 | 01/21/2019 | ND | | | | | |

Surrogate: 4-Bromofluorobenzene (PIE) 97.7 % 73.3-129

| Chloride, SM4500Cl-B | | mg/kg | | Analyzed By: AC | | | | | |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 64.0 | 16.0 | 01/21/2019 | ND | 432 | 108 | 400 | 3.77 | |

| 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 | 01/18/2019 | ND | 240 | 120 | 200 | 0.290 | |
| DRO >C10-C28* | <10.0 | 10.0 | 01/18/2019 | ND | 231 | 116 | 200 | 0.112 | |
| EXT DRO >C28-C36 | <10.0 | 10.0 | 01/18/2019 | ND | | | | | |

Surrogate: 1-Chlorooctane 92.8 % 41-142

Surrogate: 1-Chlorooctadecane 92.9 % 37.6-147

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:

BTA Oil Producers
 BOB HALL
 103 South Pecos
 Midland TX, 79701
 Fax To: (432) 683-0312

Received: 01/17/2019
 Reported: 01/22/2019
 Project Name: ROJO AE #001
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 01/17/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: SP 2 @ 2' (H900165-02)

| BTEX 8021B | | mg/kg | | Analyzed By: MS | | | | | | |
|----------------|--------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| Benzene* | <0.050 | 0.050 | 01/21/2019 | ND | 2.15 | 108 | 2.00 | 2.09 | | |
| Toluene* | <0.050 | 0.050 | 01/21/2019 | ND | 2.24 | 112 | 2.00 | 3.71 | | |
| Ethylbenzene* | <0.050 | 0.050 | 01/21/2019 | ND | 2.29 | 115 | 2.00 | 9.35 | | |
| Total Xylenes* | <0.150 | 0.150 | 01/21/2019 | ND | 6.64 | 111 | 6.00 | 6.56 | | |
| Total BTEX | <0.300 | 0.300 | 01/21/2019 | ND | | | | | | |

Surrogate: 4-Bromofluorobenzene (PID) 104 % 73.3-129

| 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 | 01/21/2019 | ND | 432 | 108 | 400 | 3.77 | | |

| 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 | 01/18/2019 | ND | 240 | 120 | 200 | 0.290 | | |
| DRO >C10-C28* | <10.0 | 10.0 | 01/18/2019 | ND | 231 | 116 | 200 | 0.112 | | |
| EXT DRO >C28-C36 | <10.0 | 10.0 | 01/18/2019 | ND | | | | | | |

Surrogate: 1-Chlorooctane 94.4 % 41-142

Surrogate: 1-Chlorooctadecane 92.9 % 37.6-147

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 reprinted 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

- QR-02 The RPD result exceeded the QC control limits; however, both percent recoveries were acceptable. Sample results for the QC batch were accepted based on percent recoveries and completeness of QC data.
- 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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Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

| | | | | | | | | | | | | | | | | |
|--|----------------|-------------------------------|-----------------------|------------|------|-------------------------|----------|--------|------------|------------|--------|---------|-------|----|-----|------|
| Company Name: BTA oil Producers | | BILL TO | | | | ANALYSIS REQUEST | | | | | | | | | | |
| Project Manager: Bob Hall | | P.O. #: | | | | | | | | | | | | | | |
| Address: | | Company: BTA | | | | | | | | | | | | | | |
| City: | State: | Zip: | Attn: Bob Hall | | | | | | | | | | | | | |
| Phone #: | Fax #: | | Address: | | | | | | | | | | | | | |
| Project #: | Project Owner: | | City: | | | | | | | | | | | | | |
| Project Name: | | State: | | Zip: | | | | | | | | | | | | |
| Project Location: ROJO AE #001 | | Phone #: | | | | | | | | | | | | | | |
| Sampler Name: Michael Ales | | Fax #: | | | | | | | | | | | | | | |
| FOR LAB USE ONLY | | | | | | | | | | | | | | | | |
| Lab I.D. | Sample I.D. | (GRAB OR (C)OMP. # CONTAINERS | MATRIX | | | PRESERV. | SAMPLING | | | | | | | | | |
| | | | GROUNDWATER | WASTEWATER | SOIL | OIL | SLUDGE | OTHER: | ACID/BASE: | ICE / COOL | OTHER: | DATE | TIME | CL | TAT | STEX |
| H900165 | | | | | | | | | | | | | | | | |
| 1 | SP1 @ Z1 | 1 | | | X | | | | | | | 1/17/19 | 10:00 | X | X | X |
| 2 | SP2 @ Z1 | 1 | | | X | | | | | | | 1/17/19 | 10:15 | X | X | X |

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 the client for the 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 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 services rendered by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

| | | | | |
|---|--|--------------|--|----------------|
| Relinquished By: | Date: 1/17/19 | Received By: | Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No | Add'l Phone #: |
| | Time: 11:00a | | Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No | Add'l Fax #: |
| Relinquished By: | Date: | Received By: | REMARKS: | |
| | Time: | | Mike @ cajon - energy . com | |
| Delivered By: (Circle One) | Sample Condition | CHECKED BY: | | |
| Sampler - UPS - Bus - Other: -11.7°c/#97 | Cool Intact <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No | | | |

† Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326



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

December 26, 2018

MICHAEL ALVES
BTA Oil Producers
103 South Pecos
Midland, TX 79701

RE: ROJO AE #001

Enclosed are the results of analyses for samples received by the laboratory on 12/21/18 10:07.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-18-11. 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,

Celey D. Keene
Lab Director/Quality Manager



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

Analytical Results For:

BTA Oil Producers
 MICHAEL ALVES
 103 South Pecos
 Midland TX, 79701
 Fax To: (432) 683-0312

| | | | |
|-------------------|--------------|---------------------|---------------|
| Received: | 12/21/2018 | Sampling Date: | 12/16/2018 |
| Reported: | 12/26/2018 | Sampling Type: | Soil |
| Project Name: | ROJO AE #001 | Sampling Condition: | Cool & Intact |
| Project Number: | NONE GIVEN | Sample Received By: | Jodi Henson |
| Project Location: | NOT GIVEN | | |

Sample ID: SP 3 @ 3' (H803756-01)

| BTEX 8021B | | mg/kg | | Analyzed By: MS | | | | | |
|----------------|--------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Benzene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.81 | 90.5 | 2.00 | 4.56 | |
| Toluene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.80 | 90.0 | 2.00 | 3.92 | |
| Ethylbenzene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.78 | 88.8 | 2.00 | 4.27 | |
| Total Xylenes* | <0.150 | 0.150 | 12/21/2018 | ND | 5.23 | 87.2 | 6.00 | 3.64 | |
| Total BTEX | <0.300 | 0.300 | 12/21/2018 | ND | | | | | |

Surrogate: 4-Bromofluorobenzene (PIL) 102 % 73 3-129

| 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 | 12/21/2018 | ND | 416 | 104 | 400 | 3.77 | |

| 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 | 12/21/2018 | ND | 199 | 99.4 | 200 | 1.11 | |
| DRO >C10-C28* | <10.0 | 10.0 | 12/21/2018 | ND | 221 | 111 | 200 | 2.44 | |
| EXT DRO >C28-C36 | <10.0 | 10.0 | 12/21/2018 | ND | | | | | |

Surrogate: 1-Chlorooctane 108 % 41-142

Surrogate: 1-Chlorooctadecane 110 % 37.6-147

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Analytical Results For:

BTA Oil Producers
 MICHAEL ALVES
 103 South Pecos
 Midland TX, 79701
 Fax To: (432) 683-0312

| | | | |
|-------------------|--------------|---------------------|---------------|
| Received: | 12/21/2018 | Sampling Date: | 12/16/2018 |
| Reported: | 12/26/2018 | Sampling Type: | Soil |
| Project Name: | ROJO AE #001 | Sampling Condition: | Cool & Intact |
| Project Number: | NONE GIVEN | Sample Received By: | Jodi Henson |
| Project Location: | NOT GIVEN | | |

Sample ID: SP 4 @ 3' (H803756-02)

| BTEX 8021B | | mg/kg | | Analyzed By: MS | | | | | | |
|----------------|--------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| Benzene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.81 | 90.5 | 2.00 | 4.56 | | |
| Toluene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.80 | 90.0 | 2.00 | 3.92 | | |
| Ethylbenzene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.78 | 88.8 | 2.00 | 4.27 | | |
| Total Xylenes* | <0.150 | 0.150 | 12/21/2018 | ND | 5.23 | 87.2 | 6.00 | 3.64 | | |
| Total BTEX | <0.300 | 0.300 | 12/21/2018 | ND | | | | | | |

Surrogate: 4-Bromofluorobenzene (PIL) 105 % 73.3-129

| Chloride, SM4500Cl-B | | mg/kg | | Analyzed By: AC | | | | | | |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| Chloride | 16.0 | 16.0 | 12/21/2018 | ND | 416 | 104 | 400 | 3.77 | | |

| 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 | 12/21/2018 | ND | 199 | 99.4 | 200 | 1.11 | | |
| DRO >C10-C28* | <10.0 | 10.0 | 12/21/2018 | ND | 221 | 111 | 200 | 2.44 | | |
| EXT DRO >C28-C36 | <10.0 | 10.0 | 12/21/2018 | ND | | | | | | |

Surrogate: 1-Chlorooctane 106 % 41-142

Surrogate: 1-Chlorooctadecane 109 % 37.6-147

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Analytical Results For:

BTA Oil Producers
 MICHAEL ALVES
 103 South Pecos
 Midland TX, 79701
 Fax To: (432) 683-0312

| | | | |
|-------------------|--------------|---------------------|---------------|
| Received: | 12/21/2018 | Sampling Date: | 12/16/2018 |
| Reported: | 12/26/2018 | Sampling Type: | Soil |
| Project Name: | ROJO AE #001 | Sampling Condition: | Cool & Intact |
| Project Number: | NONE GIVEN | Sample Received By: | Jodi Henson |
| Project Location: | NOT GIVEN | | |

Sample ID: SP 5 @ 3' (H803756-03)

| BTEX 8021B | | mg/kg | | Analyzed By: MS | | | | | | |
|----------------|--------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| Benzene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.81 | 90.5 | 2.00 | 4.56 | | |
| Toluene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.80 | 90.0 | 2.00 | 3.92 | | |
| Ethylbenzene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.78 | 88.8 | 2.00 | 4.27 | | |
| Total Xylenes* | <0.150 | 0.150 | 12/21/2018 | ND | 5.23 | 87.2 | 6.00 | 3.64 | | |
| Total BTEX | <0.300 | 0.300 | 12/21/2018 | ND | | | | | | |

Surrogate: 4-Bromofluorobenzene (PID) 96.2 % 73.3-129

| 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 | 12/21/2018 | ND | 416 | 104 | 400 | 3.77 | | |

| 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 | 12/21/2018 | ND | 199 | 99.4 | 200 | 1.11 | | |
| DRO >C10-C28* | <10.0 | 10.0 | 12/21/2018 | ND | 221 | 111 | 200 | 2.44 | | |
| EXT DRO >C28-C36 | <10.0 | 10.0 | 12/21/2018 | ND | | | | | | |

Surrogate: 1-Chlorooctane 108 % 41-142

Surrogate: 1-Chlorooctadecane 109 % 37.6-147

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Analytical Results For:

BTA Oil Producers
 MICHAEL ALVES
 103 South Pecos
 Midland TX, 79701
 Fax To: (432) 683-0312

| | | | |
|-------------------|--------------|---------------------|---------------|
| Received: | 12/21/2018 | Sampling Date: | 12/16/2018 |
| Reported: | 12/26/2018 | Sampling Type: | Soil |
| Project Name: | ROJO AE #001 | Sampling Condition: | Cool & Intact |
| Project Number: | NONE GIVEN | Sample Received By: | Jodi Henson |
| Project Location: | NOT GIVEN | | |

Sample ID: SP 6 @ 3' (H803756-04)

| BTEX 8021B | | mg/kg | | Analyzed By: MS | | | | | | |
|----------------|--------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| Benzene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.81 | 90.5 | 2.00 | 4.56 | | |
| Toluene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.80 | 90.0 | 2.00 | 3.92 | | |
| Ethylbenzene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.78 | 88.8 | 2.00 | 4.27 | | |
| Total Xylenes* | <0.150 | 0.150 | 12/21/2018 | ND | 5.23 | 87.2 | 6.00 | 3.64 | | |
| Total BTEX | <0.300 | 0.300 | 12/21/2018 | ND | | | | | | |

Surrogate: 4-Bromofluorobenzene (PID) 97.3 % 73.3-129

| Chloride, SM4500CI-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 | 12/21/2018 | ND | 416 | 104 | 400 | 3.77 | | |

| 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 | 12/21/2018 | ND | 199 | 99.4 | 200 | 1.11 | | |
| DRO >C10-C28* | <10.0 | 10.0 | 12/21/2018 | ND | 221 | 111 | 200 | 2.44 | | |
| EXT DRO >C28-C36 | <10.0 | 10.0 | 12/21/2018 | ND | | | | | | |

Surrogate: 1-Chlorooctane 104 % 41-142

Surrogate: 1-Chlorooctadecane 103 % 37.6-147

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Analytical Results For:

BTA Oil Producers
 MICHAEL ALVES
 103 South Pecos
 Midland TX, 79701
 Fax To: (432) 683-0312

| | | | |
|-------------------|--------------|---------------------|---------------|
| Received: | 12/21/2018 | Sampling Date: | 12/16/2018 |
| Reported: | 12/26/2018 | Sampling Type: | Soil |
| Project Name: | ROJO AE #001 | Sampling Condition: | Cool & Intact |
| Project Number: | NONE GIVEN | Sample Received By: | Jodi Henson |
| Project Location: | NOT GIVEN | | |

Sample ID: SP 7 @ 3' (H803756-05)

| BTEX 8021B | | mg/kg | | Analyzed By: MS | | | | | | |
|----------------|--------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| Benzene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.81 | 90.5 | 2.00 | 4.56 | | |
| Toluene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.80 | 90.0 | 2.00 | 3.92 | | |
| Ethylbenzene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.78 | 88.8 | 2.00 | 4.27 | | |
| Total Xylenes* | <0.150 | 0.150 | 12/21/2018 | ND | 5.23 | 87.2 | 6.00 | 3.64 | | |
| Total BTEX | <0.300 | 0.300 | 12/21/2018 | ND | | | | | | |

Surrogate: 4-Bromofluorobenzene (PID) 95.0 % 73.3-129

| Chloride, SM4500Cl-B | | mg/kg | | Analyzed By: AC | | | | | | |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| Chloride | 320 | 16.0 | 12/21/2018 | ND | 416 | 104 | 400 | 3.77 | | |

| 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 | 12/21/2018 | ND | 199 | 99.4 | 200 | 1.11 | | |
| DRO >C10-C28* | <10.0 | 10.0 | 12/21/2018 | ND | 221 | 111 | 200 | 2.44 | | |
| EXT DRO >C28-C36 | <10.0 | 10.0 | 12/21/2018 | ND | | | | | | |

Surrogate: 1-Chlorooctane 97.3 % 41-142

Surrogate: 1-Chlorooctadecane 96.8 % 37.6-147

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Analytical Results For:

BTA Oil Producers
 MICHAEL ALVES
 103 South Pecos
 Midland TX, 79701
 Fax To: (432) 683-0312

Received: 12/21/2018
 Reported: 12/26/2018
 Project Name: ROJO AE #001
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 12/16/2018
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: SP 8 @ 3' (H803756-06)

| BTEX 8021B | | mg/kg | | Analyzed By: MS | | | | | | |
|----------------|--------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| Benzene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.81 | 90.5 | 2.00 | 4.56 | | |
| Toluene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.80 | 90.0 | 2.00 | 3.92 | | |
| Ethylbenzene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.78 | 88.8 | 2.00 | 4.27 | | |
| Total Xylenes* | <0.150 | 0.150 | 12/21/2018 | ND | 5.23 | 87.2 | 6.00 | 3.64 | | |
| Total BTEX | <0.300 | 0.300 | 12/21/2018 | ND | | | | | | |

Surrogate: 4-Bromofluorobenzene (PID) 97.8 % 73.3-129

| Chloride, SM4500Cl-B | | mg/kg | | Analyzed By: AC | | | | | | |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| Chloride | <16.0 | 16.0 | 12/21/2018 | ND | 416 | 104 | 400 | 3.77 | | |

| 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 | 12/21/2018 | ND | 199 | 99.4 | 200 | 1.11 | | |
| DRO >C10-C28* | <10.0 | 10.0 | 12/21/2018 | ND | 221 | 111 | 200 | 2.44 | | |
| EXT DRO >C28-C36 | <10.0 | 10.0 | 12/21/2018 | ND | | | | | | |

Surrogate: 1-Chlorooctane 98.1 % 41-142

Surrogate: 1-Chlorooctadecane 95.8 % 37.6-147

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Analytical Results For:

BTA Oil Producers
 MICHAEL ALVES
 103 South Pecos
 Midland TX, 79701
 Fax To: (432) 683-0312

| | | | |
|-------------------|--------------|---------------------|---------------|
| Received: | 12/21/2018 | Sampling Date: | 12/16/2018 |
| Reported: | 12/26/2018 | Sampling Type: | Soil |
| Project Name: | ROJO AE #001 | Sampling Condition: | Cool & Intact |
| Project Number: | NONE GIVEN | Sample Received By: | Jodi Henson |
| Project Location: | NOT GIVEN | | |

Sample ID: SP 9 @ 3' (H803756-07)

| BTEX 8021B | | mg/kg | | Analyzed By: MS | | | | | | |
|----------------|--------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| Benzene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.81 | 90.5 | 2.00 | 4.56 | | |
| Toluene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.80 | 90.0 | 2.00 | 3.92 | | |
| Ethylbenzene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.78 | 88.8 | 2.00 | 4.27 | | |
| Total Xylenes* | <0.150 | 0.150 | 12/21/2018 | ND | 5.23 | 87.2 | 6.00 | 3.64 | | |
| Total BTEX | <0.300 | 0.300 | 12/21/2018 | ND | | | | | | |

Surrogate: 4-Bromofluorobenzene (PID) 98.2 % 73.3-129

| 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 | 12/21/2018 | ND | 416 | 104 | 400 | 3.92 | | |

| 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 | 12/21/2018 | ND | 199 | 99.4 | 200 | 1.11 | | |
| DRO >C10-C28* | <10.0 | 10.0 | 12/21/2018 | ND | 221 | 111 | 200 | 2.44 | | |
| EXT DRO >C28-C36 | <10.0 | 10.0 | 12/21/2018 | ND | | | | | | |

Surrogate: 1-Chlorooctane 92.6 % 41-142

Surrogate: 1-Chlorooctadecane 91.6 % 37.6-147

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Analytical Results For:

BTA Oil Producers
 MICHAEL ALVES
 103 South Pecos
 Midland TX, 79701
 Fax To: (432) 683-0312

| | | | |
|-------------------|--------------|---------------------|---------------|
| Received: | 12/21/2018 | Sampling Date: | 12/16/2018 |
| Reported: | 12/26/2018 | Sampling Type: | Soil |
| Project Name: | ROJO AE #001 | Sampling Condition: | Cool & Intact |
| Project Number: | NONE GIVEN | Sample Received By: | Jodi Henson |
| Project Location: | NOT GIVEN | | |

Sample ID: SP 10 @ 3' (H803756-08)

| BTEX 8021B | | mg/kg | | Analyzed By: MS | | | | | | |
|----------------|--------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| Benzene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.81 | 90.5 | 2.00 | 4.56 | | |
| Toluene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.80 | 90.0 | 2.00 | 3.92 | | |
| Ethylbenzene* | <0.050 | 0.050 | 12/21/2018 | ND | 1.78 | 88.8 | 2.00 | 4.27 | | |
| Total Xylenes* | <0.150 | 0.150 | 12/21/2018 | ND | 5.23 | 87.2 | 6.00 | 3.64 | | |
| Total BTEX | <0.300 | 0.300 | 12/21/2018 | ND | | | | | | |

Surrogate: 4-Bromofluorobenzene (PIE) 98.8 % 73.3-129

| 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 | 12/21/2018 | ND | 416 | 104 | 400 | 3.92 | | |

| 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 | 12/21/2018 | ND | 199 | 99.4 | 200 | 1.11 | | |
| DRO >C10-C28* | <10.0 | 10.0 | 12/21/2018 | ND | 221 | 111 | 200 | 2.44 | | |
| EXT DRO >C28-C36 | <10.0 | 10.0 | 12/21/2018 | ND | | | | | | |

Surrogate: 1-Chlorooctane 98.2 % 41-142

Surrogate: 1-Chloroadecane 96.3 % 37.6-147

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

- 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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Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

| | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----------------|---------------------|--------------------------|-------------------------|------------|------|-----|--------|-------|-----------|------------|-------|-------|--------|---|---|---|--|----------|----------|--|--|--|--|--|--|--|
| Company Name: BTA Oil Producers | | BILL TO | | ANALYSIS REQUEST | | | | | | | | | | | | | | | | | | | | | | | |
| Project Manager: Michael Alves | | P.O. #: | | | | | | | | | | | | | | | | | | | | | | | | | |
| Address: | | Company: BTA | | | | | | | | | | | | | | | | | | | | | | | | | |
| City: | State: | Zip: | Attn: Bryan Davis | | | | | | | | | | | | | | | | | | | | | | | | |
| Phone #: | Fax #: | | Address: | | | | | | | | | | | | | | | | | | | | | | | | |
| Project #: | Project Owner: | | City: | | | | | | | | | | | | | | | | | | | | | | | | |
| Project Name: | | State: Zip: | | | | | | | | | | | | | | | | | | | | | | | | | |
| Project Location: Rojo AE .001 | | Phone #: | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sampler Name: Michael Alves | | Fax #: | | | | | | | | | | | | | | | | | | | | | | | | | |
| FOR LAB USE ONLY | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Lab I.D. | Sample I.D. | # GRAB OR (C)OMP | # CONTAINERS | | | | | | | | | | | MATRIX | | | | | PRESERV. | SAMPLING | | | | | | | |
| | | | | GROUNDWATER | WASTEWATER | SOIL | OIL | SLUDGE | OTHER | ACID/BASE | ICE / COOL | OTHER | DATE | TIME | | | | | | | | | | | | | |
| H803756 | | | | | | X | | | | X | | | 12/16 | 10:25 | X | X | X | | | | | | | | | | |
| 1 | SP. 3 @ 3' | 6 | | | | X | | | | X | | | 12/16 | 10:39 | X | X | X | | | | | | | | | | |
| 2 | SP. 4 @ 3' | 6 | | | | X | | | | X | | | 12/16 | 0:49 | X | X | X | | | | | | | | | | |
| 3 | SP. 5 @ 3' | 6 | | | | X | | | | X | | | 12/16 | 11:10 | X | X | X | | | | | | | | | | |
| 4 | SP. 6 @ 3' | 6 | | | | X | | | | X | | | 12/16 | 11:23 | X | X | X | | | | | | | | | | |
| 5 | SP. 7 @ 3' | 6 | | | | X | | | | X | | | 12/16 | 11:38 | X | X | X | | | | | | | | | | |
| 6 | SP. 8 @ 3' | 6 | | | | X | | | | X | | | 12/16 | 11:48 | X | X | X | | | | | | | | | | |
| 7 | SP. 9 @ 3' | 6 | | | | X | | | | X | | | 12/16 | 12:00 | X | X | X | | | | | | | | | | |
| 8 | SP. 10 @ 3' | 6 | | | | X | | | | X | | | 12/16 | 12:00 | X | X | X | | | | | | | | | | |

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 the client for the 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 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 services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

| | | | | |
|--|--|---------------------------------|--|----------------|
| Relinquished By: | Date: 12-21-2018 | Received By: Jodi Henson | Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No | Add'l Phone #: |
| | Time: 10:07 | | Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No | Add'l Fax #: |
| Relinquished By: | Date: | Received By: | REMARKS: Mike@cajun-energy.com | |
| | Time: | | RUSH!! | |
| Delivered By: (Circle One) | Sample Condition | CHECKED BY: | | |
| Sampler - UPS - Bus - Other: 2.12/#97 | Cool Intact <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | | |

† Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326



APPENDIX B

Reference Well Log

|  | | | | | | | | Sample Name: BH01 | | Date: 1/3/2023 | |
|--|----------------|-------------|----------|-----------|-----------------------|----------------|------------------|--|--|--------------------|--|
| | | | | | | | | Site Name: Rojo 26 Oil Dump Valve Failure | | | |
| | | | | | | | | Incident Number: nAPP2224256412 | | | |
| | | | | | | | | Job Number: 03C2012006 | | | |
| LITHOLOGIC / SOIL SAMPLING LOG | | | | | | | | Logged By: CS / MR | | Method: Air Rotary | |
| Coordinates: 32.107784, -103.562235 | | | | | | | | Hole Diameter: 6" | | Total Depth: 60' | |
| Comments: Soil boring was advanced to a total depth of 60' bgs. No water was observed within the soil boring after at least 72 hours. On 1/16/2023 the soil boring was plugged and abandoned using hydrated bentonite chips. | | | | | | | | | | | |
| Moisture Content | Chloride (ppm) | Vapor (ppm) | Staining | Sample ID | Sample Depth (ft bgs) | Depth (ft bgs) | USCS/Rock Symbol | Lithologic Descriptions | | | |
| | | | | | | 0 | CCHE | (0-30'), CALICHE, coarse grain, well graded, white to tan, dry, no stain or odor. | | | |
| Dry | - | - | N | - | - | 10 | | | | | |
| Dry | - | - | N | - | - | 20 | | @20' color change to pink/tan | | | |
| Dry | - | - | N | - | - | 30 | SP-SM | (30-78'), SAND, medium to fine grain, poorly graded with trace caliche nodules, red to orange, dry, no stain, no odor. | | | |
| Dry | - | - | N | - | - | 40 | | | | | |
| Dry | - | - | N | - | - | 50 | | @50', slightly cohesive with trace clay | | | |
| Dry | - | - | N | - | - | 60 | | NOTE: refusal @ 60' using air rotary drill rig due to abundant sand. | | | |
| Total Depth @ 60 feet bgs | | | | | | | | | | | |



APPENDIX C

Form 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 | NCH1836251271 |
| District RP | 1RP-5295 |
| Facility ID | |
| Application ID | pCH1836251636 |

Release Notification

Responsible Party

| | | | |
|-------------------------|-------------------------------------|-------------------|--|
| Responsible Party | BTA Oil Producers | OGRID | 260297 |
| Contact Name | Ben Grimes | Contact Telephone | (432) 682-3753 |
| Contact email | bgrimes@btaoil.com | Incident # | NCH1836251271 ROJO AE 7811 JV-P FED 001H @ 30-025-43476 |
| Contact mailing address | 104 S. Pecos St., Midland, TX 79701 | | |

Location of Release Source

Latitude 32.107610 Longitude -103.56410
(NAD 83 in decimal degrees to 5 decimal places)

| | | | |
|-------------------------|---|----------------------|--------------|
| Site Name | Rojo AE 7811 JV-P Fed 001H (closest well) | Site Type | Tank Battery |
| Date Release Discovered | 12/02/2018 | API# (if applicable) | 30-025-43476 |

| Unit Letter | Section | Township | Range | County |
|-------------|---------|----------|-------|--------|
| D | 27 | 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) | 350 BBL | Volume Recovered (bbls) | 200 BBL |
| <input checked="" type="checkbox"/> Produced Water | Volume Released (bbls) | 35 BBL | Volume Recovered (bbls) | 20 BBL |
| | Is the concentration of dissolved chloride in the produced water >10,000 mg/l? | | <input type="checkbox"/> Yes <input checked="" 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

A dump valve froze into a closed position on the separator, causing the vessel to pressure up and the high pressure relief valve (pop-off) to open to prevent rupture of the vessel and the incoming lines.

Form C-141

State of New Mexico
Oil Conservation Division

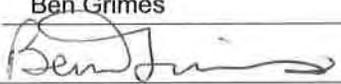
Page 2

| | |
|----------------|--|
| Incident ID | |
| District RP | |
| Facility ID | |
| Application ID | |

| | |
|--|--|
| 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 greater than 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)? Email sent to Shelly Tucker, BLM, and Christina Hernandez, NMOCD, by Michael Alves, Cajun Energy, on 12/2/2018 at 9:02 PM. | |

Initial Response

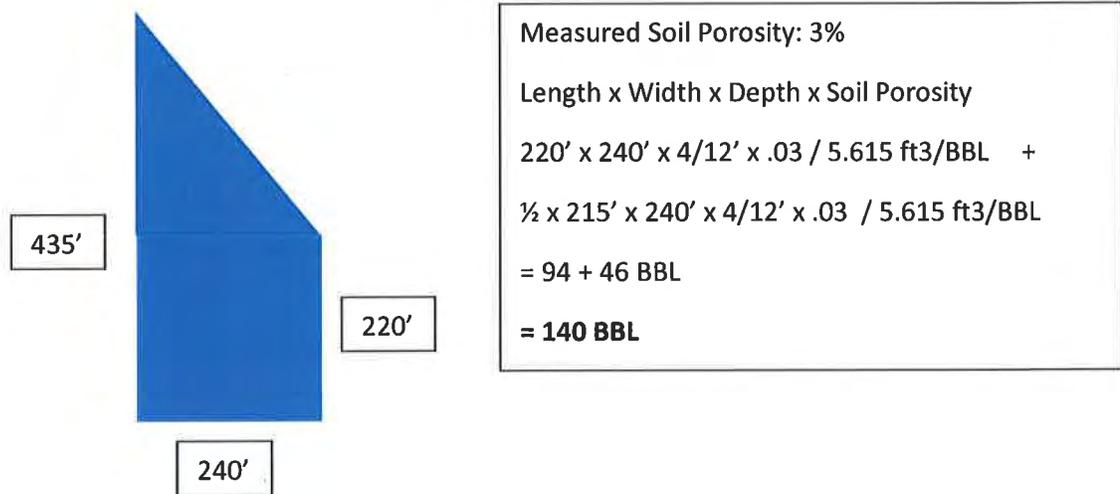
The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

| |
|--|
| <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: <u>Ben Grimes</u> Title: <u>Production Manager</u> Signature: <u></u> Date: <u>12/4/18</u> email: <u>bgrimes@btaoil.com</u> Telephone: <u>(432) 682-3753</u> |
| <u>OCD Only</u> Received by: _____ Date: _____ |

Release Notification for 12/2/2018 Incident

Calculations for Rojo AE 7811 JV-P Federal 001H (nearest well)

- The impacted area outside of the tank battery containment was calculated as follows:



- Plus: 220 BBL was contained and recovered from the tank battery secondary containment area.
- Plus: Estimated 25 BBL fluid remains inside secondary containment spread across the top of the tanks, vessels and piping.

Total volume reported: 385 BBL

At 10% Water Cut, Volumes in this Release Notification estimate are:

Crude Oil: 350 BBL

Produced Water: 35 BBL

| | |
|----------------|---------------|
| Incident ID | NCH1836251271 |
| District RP | 1RP-5295 |
| Facility ID | |
| Application ID | pCH1836251636 |

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? | >60 _____ (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 checked="" 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.

Form C-141

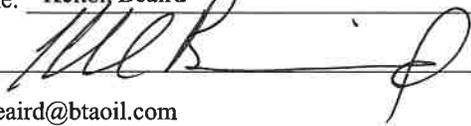
State of New Mexico
Oil Conservation Division

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| | |
|----------------|---------------|
| Incident ID | NCH1836251271 |
| District RP | 1RP-5295 |
| Facility ID | |
| Application ID | pCH1836251636 |

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: Kelton Beard Title: Environmental Manater

Signature:  Date: 6-6-23

email: kbeard@btaoil.com Telephone: 432-312-2203

OCD Only

Received by: Jocelyn Harimon Date: 06/08/2023

Form C-141

State of New Mexico
Oil Conservation Division

Page 5

| | |
|----------------|---------------|
| Incident ID | NCH1836251271 |
| District RP | 1RP-5295 |
| Facility ID | |
| Application ID | pCH1836251636 |

Remediation Plan

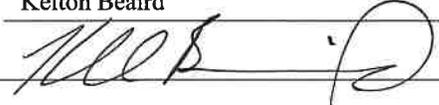
Remediation Plan Checklist: *Each of the following items must be included in the plan.*

- 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: Kelton Beard Title: Environmental Manager
 Signature:  Date: 6.6.23
 email: kbeaird@btaoil.com Telephone: 432-312-2203

OCD Only

Received by: Jocelyn Harimon Date: 06/8/2023

Approved Approved with Attached Conditions of Approval Denied Deferral Approved

Signature:  Date: 06/22/2023

Variance request to sample every 700 square feet is denied. OCD approves a sampling variance of collecting samples every 500 square feet, this includes sidewall and base samples.

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 225618

CONDITIONS

| | |
|---|---|
| Operator: BTA OIL PRODUCERS, LLC 104 S Pecos Midland, TX 79701 | OGRID: 260297 |
| | Action Number: 225618 |
| | Action Type: [C-141] Release Corrective Action (C-141) |

CONDITIONS

| Created By | Condition | Condition Date |
|------------|--|----------------|
| amaxwell | Work plan approved with conditions for sampling. | 6/22/2023 |
| amaxwell | Variance request to sample every 700 square feet is denied. | 6/22/2023 |
| amaxwell | OCD approves a sampling variance of collecting samples every 500 square feet, this includes sidewall and base samples. | 6/22/2023 |
| amaxwell | Submit a closure report via the OCD permitting portal by October 27, 2023. | 6/22/2023 |