



McNabb Partners, LLC
Hobbs • Carlsbad • Midland
575.397.0050
www.mcnabbpartnersllc.com

November 19, 2024

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

RE: Closure Report
Incident ID: nAPP2427649926
Kizer SWD #001
Project ID: riley-permian-Kizer-SWD

NMOCD:

McNabb Partners submits this closure request on behalf of Riley Permian Operating Company, LLC. This document describes the liner inspection activities on for Hawk 9 Battery (Site)

The release was discovered on September 29, 2024, due to the corrosion in a nipple of a disposal pump. The release fully contained within a lined containment. The release consisted of approximately 50 bbls of produced water of which all 50 bbls were recovered.

1. Characterization

The following sections address items as described in 19.15.29.11.A, paragraphs 1- 4. Please refer to the characterization table below for additional criteria and Plat 02 for verification.

1.1. Site Location

Plat 01 shows the topographical location of the Site. The source of the release is located within the lined containment at 33.614915, -103.479723 (Lat, Long; NAD83). The release extent covered an area of approximately 6,700 sq. ft. The release extent is shown in Plat 03.



Site Characterization	
What is the shallowest depth to groundwater (ft bgs)	Unknown (less than 25 ft bgs)
What measure was used to determine this?	NM OSE iWaters Database Search
Did this release impact ground or surface water?	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
<ul style="list-style-type: none"> • A continuously flowing watercourse or any other significant watercourse 	Between 1 mi and 5 mi
<ul style="list-style-type: none"> • Any lakebed, sinkhole or playa lake (measured from the ordinary high-water mark) 	Between 1 mi and 5 mi
<ul style="list-style-type: none"> • An occupied permanent residence, school, hospital, institution or church 	Between 1 mi and 5 mi
<ul style="list-style-type: none"> • A spring or private domestic fresh water well used by less than five households for domestic or stock watering purposes 	Between 1 mi and 5 mi
<ul style="list-style-type: none"> • Any other fresh water well or spring 	Between 1 mi and 5 mi
<ul style="list-style-type: none"> • Incorporated municipal boundaries or a defined municipal fresh water well field 	Between 1 mi and 5 mi
<ul style="list-style-type: none"> • A wetland 	Between 1 mi and 5 mi
<ul style="list-style-type: none"> • A subsurface mine 	Between 1 mi and 5 mi
<ul style="list-style-type: none"> • A (non-karst) unstable area 	Between 1 mi and 5 mi
<ul style="list-style-type: none"> • Categorize the risk of this well/site being in a karst geology 	Unknown (Low)
<ul style="list-style-type: none"> • A 100-year floodplain 	Between 1 mi and 5 mi
<ul style="list-style-type: none"> • Did the release impact areas not on an exploration, development, production, or storage site? 	No



1.2. Site Characterization

Based on a review of the USGS and NMOSE groundwater databases, there are no known groundwater sources within 1/2-mile of the Site. The Site is located more than 200 feet from a lakebed, sinkhole, or playa lake, and over 300 feet from any occupied residence, school, hospital, institution, church, or wetland. Site is over 1,000 feet from a freshwater well or spring and is not within a 100-year floodplain or above a subsurface mine. The Karst potential for Roosevelt County, NM is undetermined. Complete site characterization map is shown in Plat 02

Closure Criteria as listed in Table 1 of 19.15.29 NMAC, where the depth-to-water is undetermined is defined as:

DTW - Unknown	Chloride (mg/kg)	GRO+DRO (mg/kg)	TPH Ext. (mg/kg)	Benzene (mg/kg)	BTEX (mg/kg)
0 - 4 feet & "not in-use"	600	--	100	10	50
> 4 ft or "in-use"	600	--	100	10	50

2. Initial Site Assessment - Liner Inspection

Prior to the liner inspection, all released fluids were vacuumed and removed, and the liner was pressure-washed. On October 30, 2024, McNabb Partners were on site to perform a site assessment to evaluate the condition and integrity of the tank battery's secondary containment liner. The inspection revealed that the liner is intact and in a good condition, showing no signs of damage, such as holes, stressed areas or breaches, and was clear of any standing produced water or crude oil. All liquids visible in the photographs (Figures 1 through 6) were the result of a pressure washing. The inspected liner is shown on Plat 03.

3. Closure Request

On behalf of Riley Permian Operating Company, we respectfully request a closure for the incident ID: nAPP2417651378. Following the initial assessment and remedial activities, the Site is in full compliance, and no further actions are required.

Please contact me with any questions at 917-497-6890.

Sincerely,

Dimitry Nikanorov
Environmental Manager
McNabb Partners
(917) 497-6890



Copy: Spence Laird, Riley Permian Operating Company, LLC



Figure 1. View of the Inspected Liner.



Figure 2. View of the Inspected Liner.



Figure 3. View of the Inspected Liner.

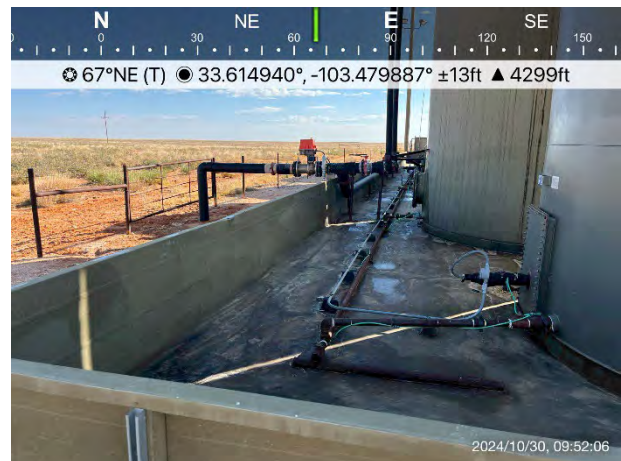


Figure 4. View of the Inspected Liner.



Figure 5. View of the Inspected Liner.

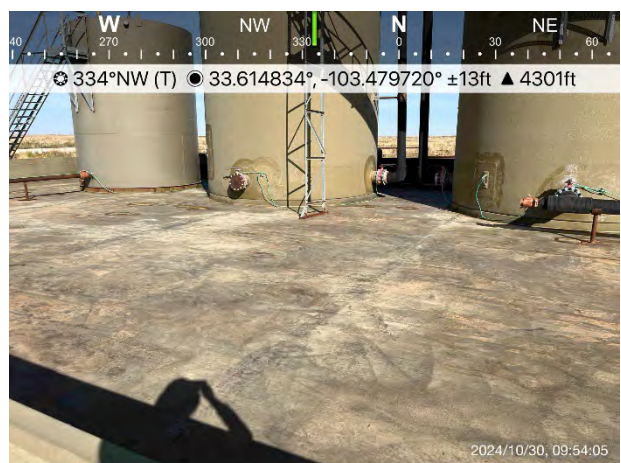
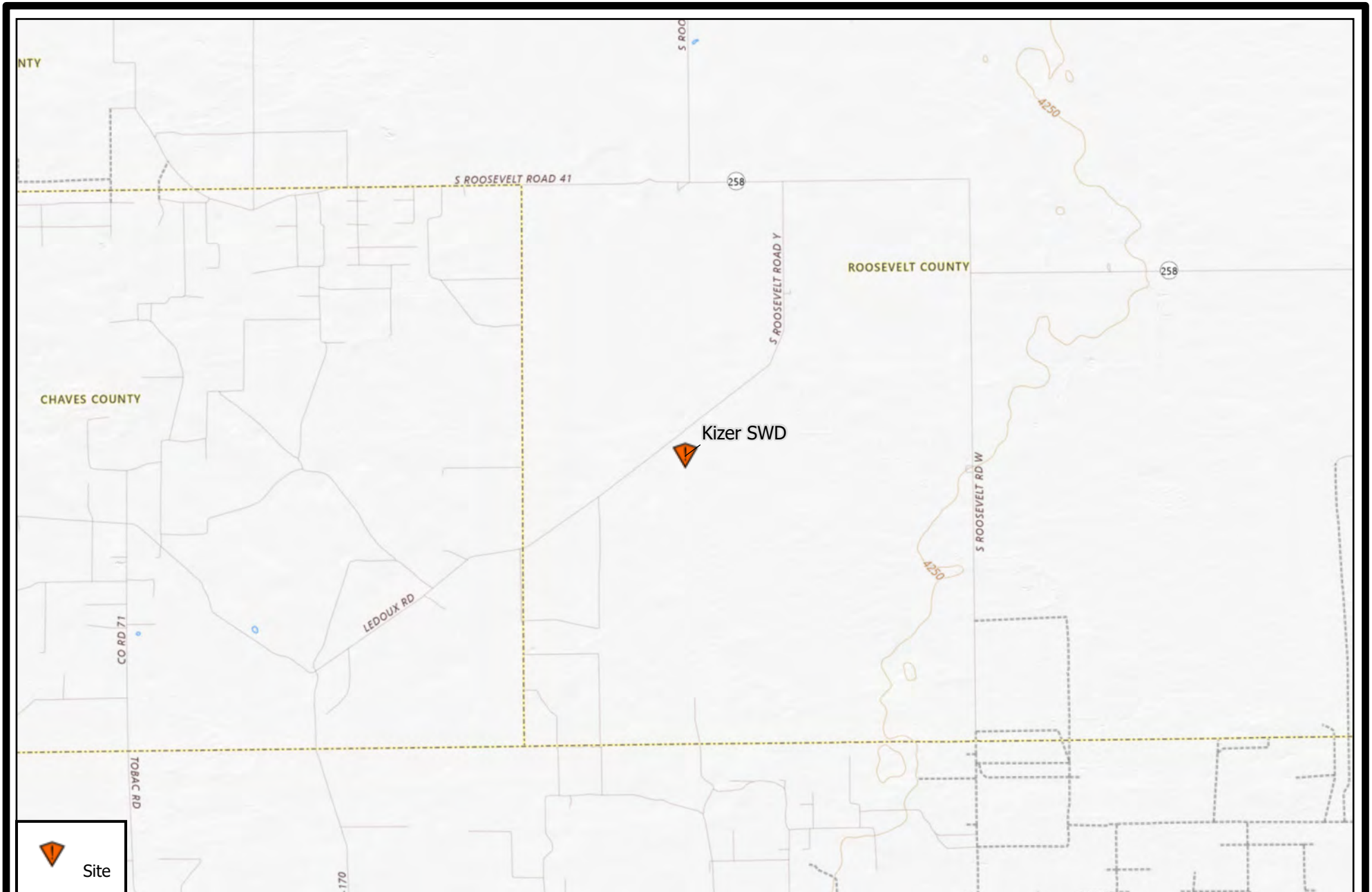


Figure 6. View of the Inspected Liner.

Plats

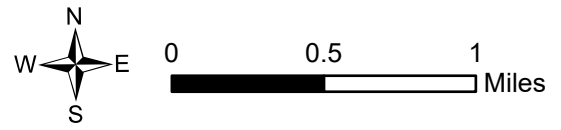
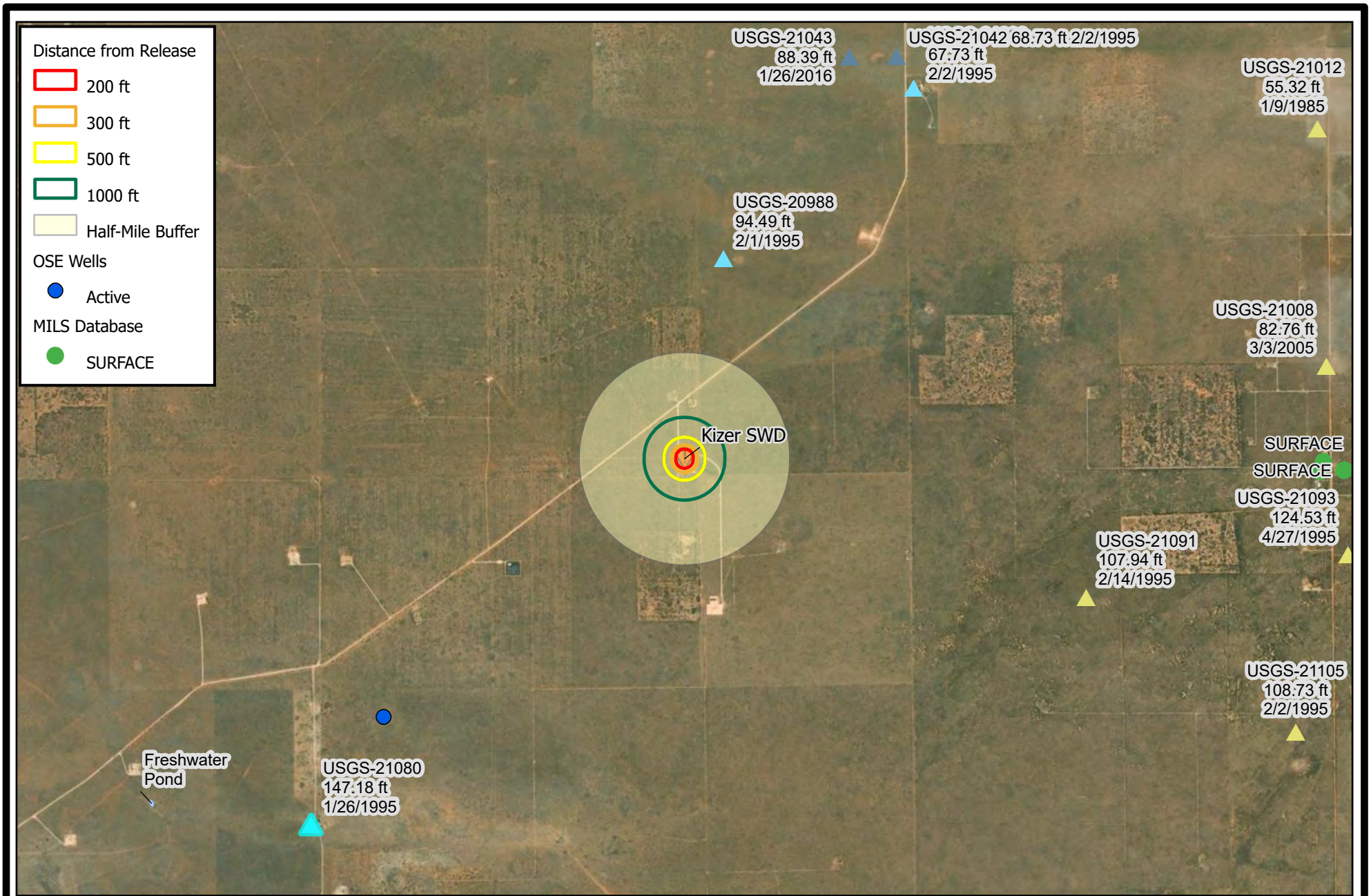


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Site Location Map Kizer SWD #001 nAPP2427649926 riley-permian-Kizer-SWD
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Plat 01 11/15/2024

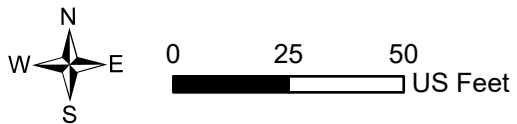


Site Characterization Map
Kizer SWD #001
nAPP2427649926
riley-permian-Kizer-SWD

Plat 02
11/15/2024



 Lined Containment



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Site Assessment Map Kizer SWD #001
nAPP2427649926 riley-permian-Kizer-SWD

Plat 03
11/15/2024

Appendix A

Communications



McNabb Partners, LLC
Hobbs • Carlsbad • Midland

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

QUESTIONS
 Action 396118

QUESTIONS

Operator: RILEY PERMIAN OPERATING COMPANY, LLC 29 E Reno Avenue, Suite 500 Oklahoma City, OK 73104	OGRID: 372290
	Action Number: 396118
	Action Type: [NOTIFY] Notification Of Liner Inspection (C-141L)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2427649926
Incident Name	NAPP2427649926 KIZER SWD #001 @ 30-041-20968
Incident Type	Produced Water Release
Incident Status	Initial C-141 Approved
Incident Well	[30-041-20968] KIZER SWD #001

Location of Release Source	
Site Name	KIZER SWD #001
Date Release Discovered	09/29/2024
Surface Owner	Private

Liner Inspection Event Information	
<i>Please answer all the questions in this group.</i>	
What is the liner inspection surface area in square feet	6,700
Have all the impacted materials been removed from the liner	Yes
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	10/30/2024
Time liner inspection will commence	09:00 AM
Please provide any information necessary for observers to liner inspection	Please contact dimitry@mcnabbpartners or at 917-497-6890
Please provide any information necessary for navigation to liner inspection site	GPS coordinates: 33.614493,-103.479174

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CONDITIONS
 Action 396118

CONDITIONS

Operator: RILEY PERMIAN OPERATING COMPANY, LLC 29 E Reno Avenue, Suite 500 Oklahoma City, OK 73104	OGRID: 372290
	Action Number: 396118
	Action Type: [NOTIFY] Notification Of Liner Inspection (C-141L)

CONDITIONS

Created By	Condition	Condition Date
dnikanorov24	Failure to notify the OCD of liner inspections including any changes in date/time per the requirements of 19.15.29.11.A(5)(a)(ii) NMAC, may result in the inspection not being accepted.	10/28/2024

Sante Fe Main Office
Phone: (505) 476-3441

General Information
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QUESTIONS

Action 407702

QUESTIONS

Operator: RILEY PERMIAN OPERATING COMPANY, LLC 29 E Reno Avenue, Suite 500 Oklahoma City, OK 73104	OGRID: 372290
	Action Number: 407702
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2427649926
Incident Name	NAPP2427649926 KIZER SWD #001 @ 30-041-20968
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Well	[30-041-20968] KIZER SWD #001

Location of Release Source	
<i>Please answer all the questions in this group.</i>	
Site Name	KIZER SWD #001
Date Release Discovered	09/29/2024
Surface Owner	Private

Incident Details	
<i>Please answer all the questions in this group.</i>	
Incident Type	Produced Water Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release	
<i>Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.</i>	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Equipment Failure Pump Produced Water Released: 50 BBL Recovered: 50 BBL Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	1/2" nipple on top of disposal pump corroded and 50 bbls produced water was released into the lined containment at Kizer SWD. The pump was isolated, and nipple was replaced to stop the leak. All fluids stayed in the containment.

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QUESTIONS, Page 2

Action 407702

QUESTIONS (continued)

Operator: RILEY PERMIAN OPERATING COMPANY, LLC 29 E Reno Avenue, Suite 500 Oklahoma City, OK 73104	OGRID: 372290
	Action Number: 407702
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
<i>With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.</i>	

Initial Response

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

The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	<i>Not answered.</i>

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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

I hereby agree and sign off to the above statement	Name: Dimitry Nikanorov Email: dimitry@mcnabbpartners.com Date: 12/09/2024
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QUESTIONS, Page 3

Action 407702

QUESTIONS (continued)

Operator: RILEY PERMIAN OPERATING COMPANY, LLC 29 E Reno Avenue, Suite 500 Oklahoma City, OK 73104	OGRID: 372290
	Action Number: 407702
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Site Characterization

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Less than or equal 25 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 1 and 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Between 1 and 5 (mi.)
A wetland	Between 1 and 5 (mi.)
A subsurface mine	Between 1 and 5 (mi.)
An (non-karst) unstable area	Between 1 and 5 (mi.)
Categorize the risk of this well / site being in a karst geology	None
A 100-year floodplain	Between 1 and 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	10/30/2024
On what date will (or did) the final sampling or liner inspection occur	10/30/2024
On what date will (or was) the remediation complete(d)	10/30/2024
What is the estimated surface area (in square feet) that will be remediated	0
What is the estimated volume (in cubic yards) that will be remediated	0

These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed. The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 4

Action 407702

QUESTIONS (continued)

Operator: RILEY PERMIAN OPERATING COMPANY, LLC 29 E Reno Avenue, Suite 500 Oklahoma City, OK 73104	OGRID: 372290
	Action Number: 407702
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:

(Select all answers below that apply.)

Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	Not answered.

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.

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

I hereby agree and sign off to the above statement	Name: Dmitry Nikanorov Email: dimitry@mcnabbpartners.com Date: 12/09/2024
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The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 6

Action 407702

QUESTIONS (continued)

Operator: RILEY PERMIAN OPERATING COMPANY, LLC 29 E Reno Avenue, Suite 500 Oklahoma City, OK 73104	OGRID: 372290
	Action Number: 407702
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	396118
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	10/30/2024
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	6700

Remediation Closure Request	
<i>Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.</i>	
Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	0
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	Liner Inspection

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

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

I hereby agree and sign off to the above statement	Name: Dmitry Nikanorov Email: dimitry@mcnabbpartners.com Date: 12/09/2024
--	---

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CONDITIONS

Action 407702

CONDITIONS

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CONDITIONS

Created By	Condition	Condition Date
rhamlet	We have received your Remediation Closure Report for Incident #NAPP2427649926 KIZER SWD #001, thank you. This Remediation Closure Report is approved.	12/30/2024