TETRA TECH

January 15, 2025

District Supervisor
Oil Conservation Division, District 2
506 W. Texas
Artesia, New Mexico 88210

Re: Closure Request
JR Oil, Ltd. Co.
Eaton B AC 1#001
Unit Letter G, Section 12, Township 25 South, Range 37 East
Lea County, New Mexico
Incident ID# NOY1704032211
1RP-4591

Sir or Madam,

Tetra Tech, Inc. (Tetra Tech) was contacted by JR Oil, Ltd. Co. (JR Oil) to evaluate a historical release and subsequent remedial actions performed at the Eaton B AC 1 #001 Tank Battery release site (API No. 30-025-11549). The release footprint is located in Public Land Survey System (PLSS) Unit Letter G, Section 12, Township 25 South, Range 37 East, in Lea County, New Mexico (Site). The C-141 does not list geographic coordinates. Based on language in the C-141 the approximate geographic coordinates of the release point are 32.147477°, -103.115228°. The approximate location of the release is shown on Figures 1 and 2.

BACKGROUND

According to the NMOCD C-141 Initial Report, the release was discovered on January 15, 2017. The release was a result of a fire caused by a lightning strike on the tank battery facility. The release consisted of 202 barrels of crude oil and 43 barrels of produced water, of which no volume was recovered. According to the C-141, the oil was burned up in the fire and the oil tank was blown into the pasture. The fire resulted in a burned section of approximately 100 yards.

The NMOCD approved the initial C-141 on February 9, 2017, and subsequently assigned the release the Incident ID NOY1704032211 and the Remediation Permit (RP) number 1RP-4591. The initial C-141 form is included in Appendix A.

2017 TRINITY ASSESSMENT AND REMEDIATION PLAN

Following the C-141 notification, Trinity Oilfield Services & Rentals, LLC (Trinity) performed an investigation of the reported release extent as shown on Figure 3. A copy of the Environmental Site Summary & Spill Remediation Plan prepared by Trinity and dated August 25, 2017 (Trinity Work Plan), is available in the NMOCD online imaging files for 1RP-4591.

On February 24, 2017, Trinity was onsite to install six (6) trenches (SP-1 through SP-6) within the release extent to a maximum depth of 8 feet below ground surface (bgs) to assess the vertical impact of the incident. A total of twenty-one (21) soil samples were collected from the six (6) trenches and sent to Cardinal Laboratories in Hobbs, New Mexico (Cardinal) to be analyzed for BTEX via EPA Method 8021B, TPH via

Tetra Tech
901 West Wall St., Suite 100, Midland, TX 79701
Tel 432.682.4559 Fax 432.682.3946 www.tetratech.com

EPA Method 8015M, and chlorides via Standard Method 4500Cl-B. Table 1 provides a summary of the analytical results from the assessment. Sample locations from the initial assessment are depicted in Figure 3.

Analytical results associated with soil samples collected during the February 2017 assessment activities were elevated for chloride content in trenches SP-1, SP-2, and SP-4 through SP-6. Additionally, elevated TPH levels were detected in soils associated with locations SP-1, SP2, SP-4, and SP-5. Elevated BTEX levels were detected in samples associated with locations SP-1 and SP-4.

On April 17 and 19, 2017, Trinity returned to the Site to complete vertical delineation in the areas represented by trenches SP-1 through SP-6. A mechanical auger was used to re-enter the trenches and advance borehole locations SP-1 and SP-3 through SP-6 to 11 feet bgs each, and SP-2 to 13 feet bgs. Additional boreholes were installed at locations SP-7 through SP-9 to a maximum depth of 11 feet bgs. Additional borehole locations are depicted in Figure 3. A total of twenty-four (24) soil samples were collected from the six trenches and sent to Cardinal to be analyzed for BTEX via EPA Method 8021B, TPH via EPA Method 8015M, and chlorides via Standard Method 4500Cl-B. Analytical results associated with soil samples collected during the April 2017 assessment activities were elevated for chloride in SP-1, SP-2, SP-4, and SP-9 and for TPH in SP-8.

According to the Trinity Work Plan, NMOCD requested additional sampling between sample locations SP-1 and SP-2 in the primary area of the release to complete vertical delineation of the release. No record of this correspondence is located on the NMOCD imaging website. On June 16, 2017, Trinity was onsite to install SB-1 utilizing a mechanical auger to a maximum depth of 35 feet bgs. A Background boring was installed during the same mobilization. A total of eight (8) soil samples were collected from the two boreholes and submitted to Cardinal to be analyzed for chlorides via Standard Method 4500Cl-B and select samples analyzed for BTEX via EPA Method 8021B and TPH via EPA Method 8015M as well. Elevated chloride levels were associated with samples from SB-1. No elevated chloride levels were associated with samples from the Background location.

The Trinity Work Plan proposed excavation of the areas represented by sample locations SP-3, SP-6 through SP-8, and SB-1 to 1-foot bgs. The areas represented by sample locations SP-4 and SP-5 would be excavated to 2-feet bgs. The areas represented by sample locations SP-1, SP-2, and SP-9 would be excavated to 4-feet bgs. Due to the presence of on-site storage tanks, excavation of impacted soils around said tanks would be limited in order to preserve the structural integrity. Soil samples were proposed for collection on 50-foot horizontal intervals from sidewalls. Prior to backfilling, a 20-mil, impermeable, plastic liner would be installed on the floor of the areas represented by sample locations SP-1, SP-2, SP-4, SP-5, SP-9, and SB-1.

The Trinity Work Plan also included Site Soil Remediation Levels and a NMOCD Ranking Score, previously utilized by the NMOCD to determine recommended remedial action levels (RRALs). The depth-to-groundwater was noted as being 90 feet below ground surface. The distance to surface water body indicated as greater than 1,000 feet. The release area was not located closer than 1,000 feet from a Water Source or less than 200 feet from a Domestic Water Source. The Site was given a NMOCD Ranking Score of zero (0). Soil Remediation Levels were determined to be 10 mg/kg for Benzene, 50 mg/kg for BTEX, 1,000 mg/kg for TPH, and 500 mg/kg for Chlorides.

NMOCD online imaging records indicate that the Trinity Work Plan was sent to Olivia Yu of the NMOCD on September 6, 2017. Following several iterations of correspondence between Olivia Yu and Ben Arguijo (Trinity), Olivia Yu approved the Remediation Plan on October 6, 2017. Copies of the regulatory correspondence can be found in Appendix B.

INITIAL CLOSURE REPORT

Based on the remedial activities described in a preliminary closure report included in the OCD online imaging files, JR Oil began executing the approved Remediation Plan between February 2-22, 2018. Soils were excavated with a backhoe down to 1.5 to 2 feet below surrounding grade until a hard caliche layer

was encountered. Soils were stockpiled onsite, atop a liner. On February 27, 2018 Joe Tippy of JR Oil met with Olivia Yu of the NMOCD to discuss remedial progress and additional work. Per the NMOCD imaging website, Olivia Yu provided clarification on key items including:

> *"1. Excavate 4 ft. with minimal 20 mil liner in the area North of the pad (area represented by SP1, SP2, SP9).*
> *2. Confirmation sidewall samples for chlorides in 50 ft. intervals.*
> *3. Bottom samples needed only for areas not lined. Areas, which require confirmation bottom samples tested for BTEX and/or TPH extended, are based on tabulated data in the approved delineation plan.*
> *4. In the remediation plan, provide an appropriately scaled map with 1) GPS coordinates of the bottom and sidewall confirmation samples (can be tabulated); 2) lined areas outlined and dimensions of the excavated area that is redrawn; and 4) annotate depth(s) of excavation.*
> *5. If a site visit is requested, provide 48 hours advance notice."*

Following the meeting and correspondence, JR Oil continued executing the remediation per NMOCD guidance. Between March 5-10, 2018, the excavation was completed across all areas utilizing a dozer and loader machine equipment. Between March 15 and April 27, 2018, confirmation soil samples were collected at three (3) floor locations (Floor #1 through Floor #3) and twelve (12) sidewall locations (SP-1 through SP-12), including excavation expansions associated with SP-9 (at SP 9-2, SP 9-3, SP-5) and SP-10 (at SP 10-2). A total of nineteen (19) confirmation soil samples were collected and sent to Xenco Laboratories in Midland, TX (Xenco) for analysis. Soil samples associated with locations Foor #1 through Floor #3 were analyzed for BTEX via EPA Method 8021B. Soil samples associated with sidewall locations SP-1 through SP-12 were analyzed for chlorides via EPA Method 300. The initial confirmation sampling results are summarized in Table 2.

ON June 1, 2018, Maren Latimer of Lynx Petroleum Consultants, Inc. (Lynx) submitted the preliminary closure report via email to Olivia Yu of the NMOCD. Oliva Yu responded on June 21 with the following comments:

> *"Please address following concerns regarding the remediation report for 1RP-4591.*
> *1. There may have been some miscommunication during the meeting on February 27, 2018. Please be advised that generally, confirmation sidewall samples are required for each area with a different excavation depth. For example, sidewall/edge samples were expected at the border between the 4 ft. (red) and 2 ft. (blue) areas and the border between the 4 ft. and 1 ft. (green) area. Do you have field tests to represent the change in excavation depth with permissible levels of BTEX, chlorides, and TPH extended demonstrated?*
> *2. Were confirmation samples taken from the edge of the 1 ft. excavation (green)?*
> *3. Does delineation sample location SP-9 fall within the 4 ft. or 2 ft. excavation area?*
> *4. A bottom confirmation sample will be required at 2 ft. bgs for the area represented by delineation sample location SP-5. Laboratory analyses of TPH extended and chlorides are required.*
> *5. What is the pile South of SP-9 area? Is this stockpiled soil?*
> *6. Was impacted soil removed and area lined before the reestablishment of the battery? It is situated over delineation sample point SP-4, which had elevated BTEX and TPH extended up to a 1 ft. in depth and above permissible chloride levels at 11 ft. bgs. If not, this would explain the above permissible chloride levels for sidewall samples SP-10 and SP-12. Were confirmation bottom and sidewall samples taken for this area around the bermed tank battery?"*

Joe Tippy responded, requesting a meeting in order to discuss concerns in the June 21, 2018 correspondence. A meeting was held on the morning of June 29, 2018 with Olivia Yu who subsequently summarized the discussion of the meeting in an email correspondence. Comments were as follows:

"- As the areas represented by SP-12 will be lined, a confirmation bottom sample is not required.
- The areas represented by SP-10 and SP-12 will be lined and welded to the liner currently in place under the tank battery. No additional confirmation samples are required for this area.
- The area for the tank battery had a 4 ft. excavation and lined with minimal 20 mil liner before filling with pea gravel.

These additional confirmation samples will be taken in the 1 ft. excavation area. See attachment. Please review.
Several sampling locations may be missing from the annotated map.
1. Confirmation sidewall sample to represent SP-4 delineation sample location will be analyzed for BTEX, TPH, and chlorides.
2. Confirmation sidewall samples will be taken for chloride analyses at the East border and North and South of the pasture area.
3. A bottom confirmation sample will be taken for chloride analyses in the vicinity of the Floor 1 area.
3. Confirmation sidewall sample for TPH extended analyses will be taken in the area represented by the SP-8 delineation sample location."

Joe Tippy responded on June 29, via email, agreeing with the notes provided by Olivia Yu. Copies of the regulatory correspondence are included in Appendix B.

UPDATED CLOSURE REPORT

On July 2, 2018, seven (7) additional confirmation soil samples were collected (7-2 #1 through 7-2 #7) from the 1-foot excavation area to comply with the NMOCD directives and sent to Xenco to be analyzed for BTEX via EPA Method 8021B, TPH via EPA Method 8015M, and chloride via EPA Method 300. Figure 4 depicts the additional confirmation sample locations.

The analytical results from the additional confirmation sampling event are summarized in Table 3. All analytical results associated with the additional confirmation samples were below Site RRALs. The analytical results, sampling map, and a short statement requesting approval to line, backfill, and complete remediation activities at the Site were compiled in an updated closure report and submitted to the NMOCD. Maren Latimer of Lynx submitted the report via email to Oliva Yu of the NMOCD on July 18, 2018. Oliva Yu approved the activities completed thus far at the Site and provided subsequent approval for liner placement and backfill. A copy of the approved updated closure report is included in Appendix C. Copies of the regulatory correspondence are included in Appendix B.

REMEDIAL COMPLETION

Further correspondence between the NMOCD and JR Oil or any associated representative cannot be located at this time. Documentation of the approved backfill and liner placement activities are not available in the NMOCD online imaging files. A review of historical aerial imagery was performed to review Site history and to identify evidence of the completed remediation. Initial response actions were observed in aerial imagery of the Site from late 2017 and early 2018. The backfilled excavations and evidence of a new liner placed on the berm of the new tank battery were observed in the next available aerial imagery from 2019. By all indications, the approved liner was placed at the base of the excavations and backfill completed per NMOCD approved plans. Documentation of the final remedial actions, in all likelihood, was transmitted to the NMOCD by way of email, but lost during a transitional period to the NMOCD portal submittal.

CONCLUSION

Release assessment and remediation activities completed at the Incident ID NOY1704032211 Site, as well as consistent communication records between JR Oil and the NMOCD, are well documented in the NMOCD online imaging files associated with 1RP-4591. A review of historical aerial imagery indicates that the

approved liner placement and backfilling activities were successfully completed following NMOCD approval. Considering the good faith effort made by JR Oil through the many correspondences, continuing updates throughout the remedial activities, and evidence of finalized remedial action through aerial imagery, JR Oil requests closure for this release incident.

The completed C-141 forms are enclosed in Appendix A. If you have any questions concerning the remedial activities conducted at the Site, please call me at (509) 768-2191.

Sincerely,
Tetra Tech, Inc.

Sam Chama, P.G.
Staff Geologist

Christian M, Llull, P.G.
Program Manager

LIST OF ATTACHMENTS

Figures:

Figure 1 – Overview Map
Figure 2 – Topographic Map
Figure 3 – Approximate Release Extent and Assessment Locations
Figure 4 – Approximate Remediation Extent

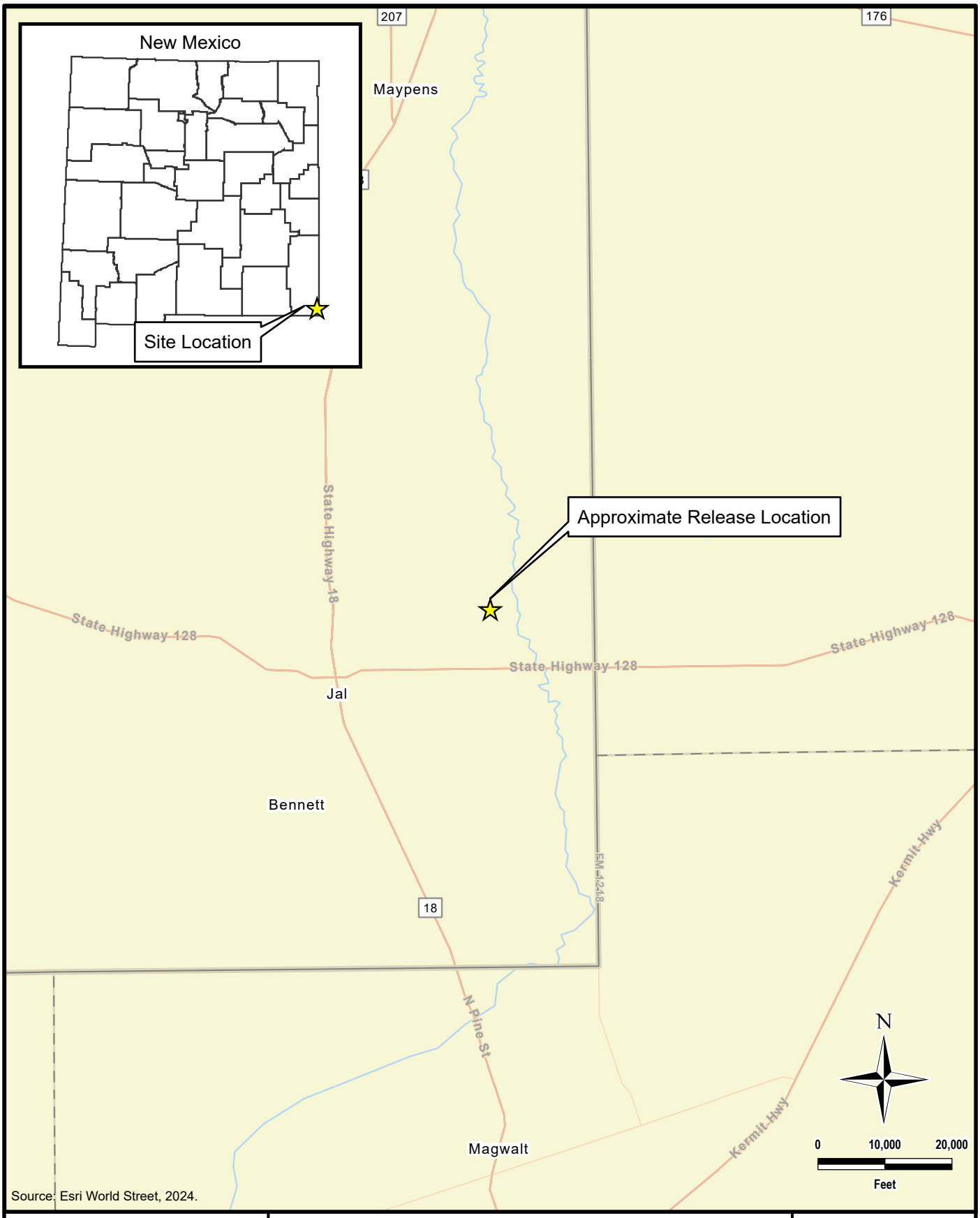
Tables:

Table 1 – Summary of Analytical Results – Trinity Soil Assessment
Table 2 – Summary of Analytical Results – Initial Confirmation Samples
Table 3 – Summary of Analytical Results – Final Confirmation Samples

Appendices:

Appendix A – C-141 Forms
Appendix B – Regulatory Correspondence
Appendix C – Updated Closure Report

FIGURES



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TETRA TECH
www.tetratech.com
901 West Wall Street, Suite 100
Midland, Texas 79701
Phone: (432) 682-4559
Fax: (432) 682-3946

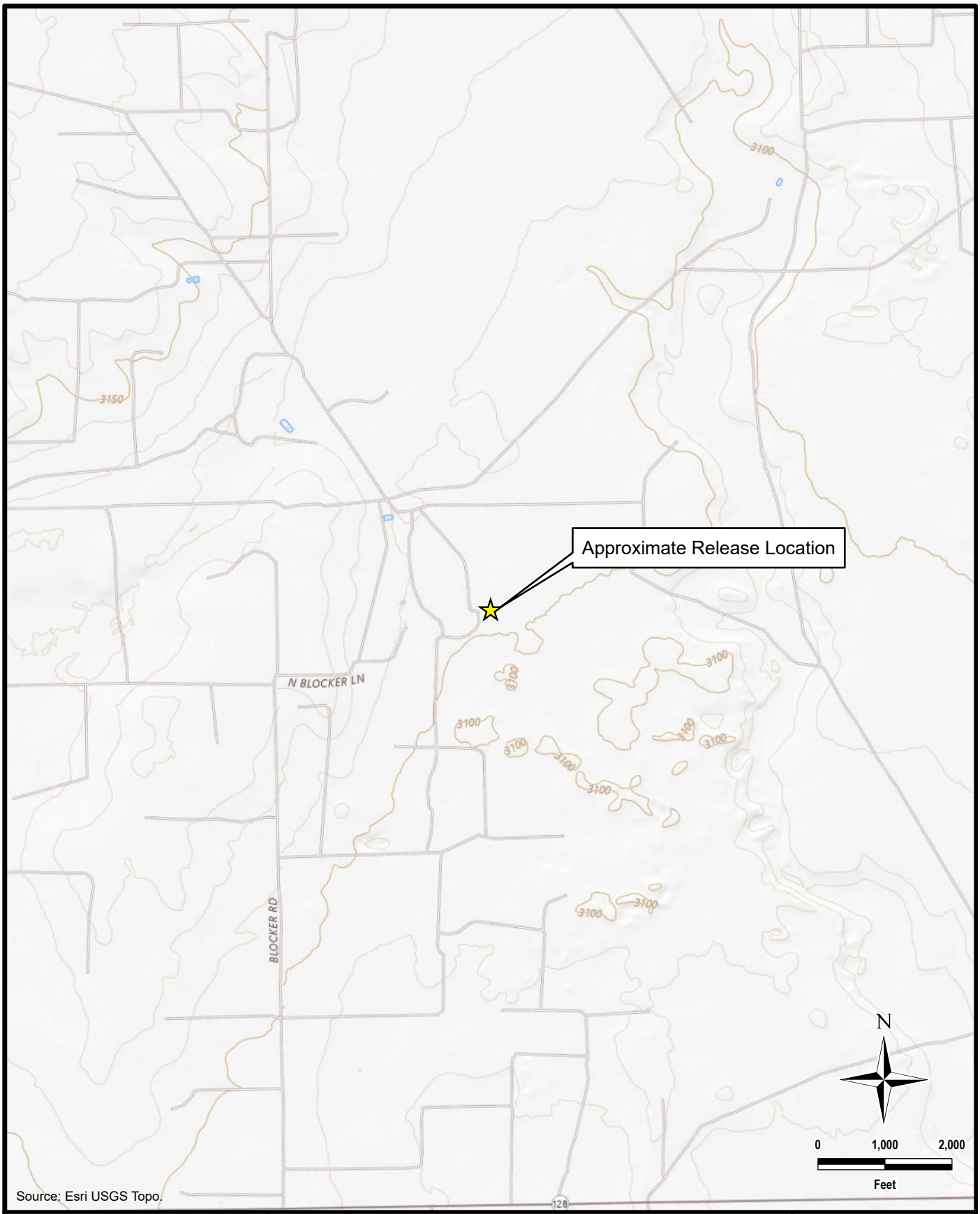
JR OIL, LTD. CO

NOY1704032211
(32.147477°, -103.115228°)
LEA COUNTY, NEW MEXICO

EATON B AC 1 #001
OVERVIEW MAP

PROJECT NO.:	212C-MD-0XXX
DATE:	NOVEMBER 20, 2024
DESIGNED BY:	LMV

Figure No.
1



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TETRA TECH

www.tetratech.com

901 West Wall Street, Suite 100
Midland, Texas 79701
Phone: (432) 682-4559
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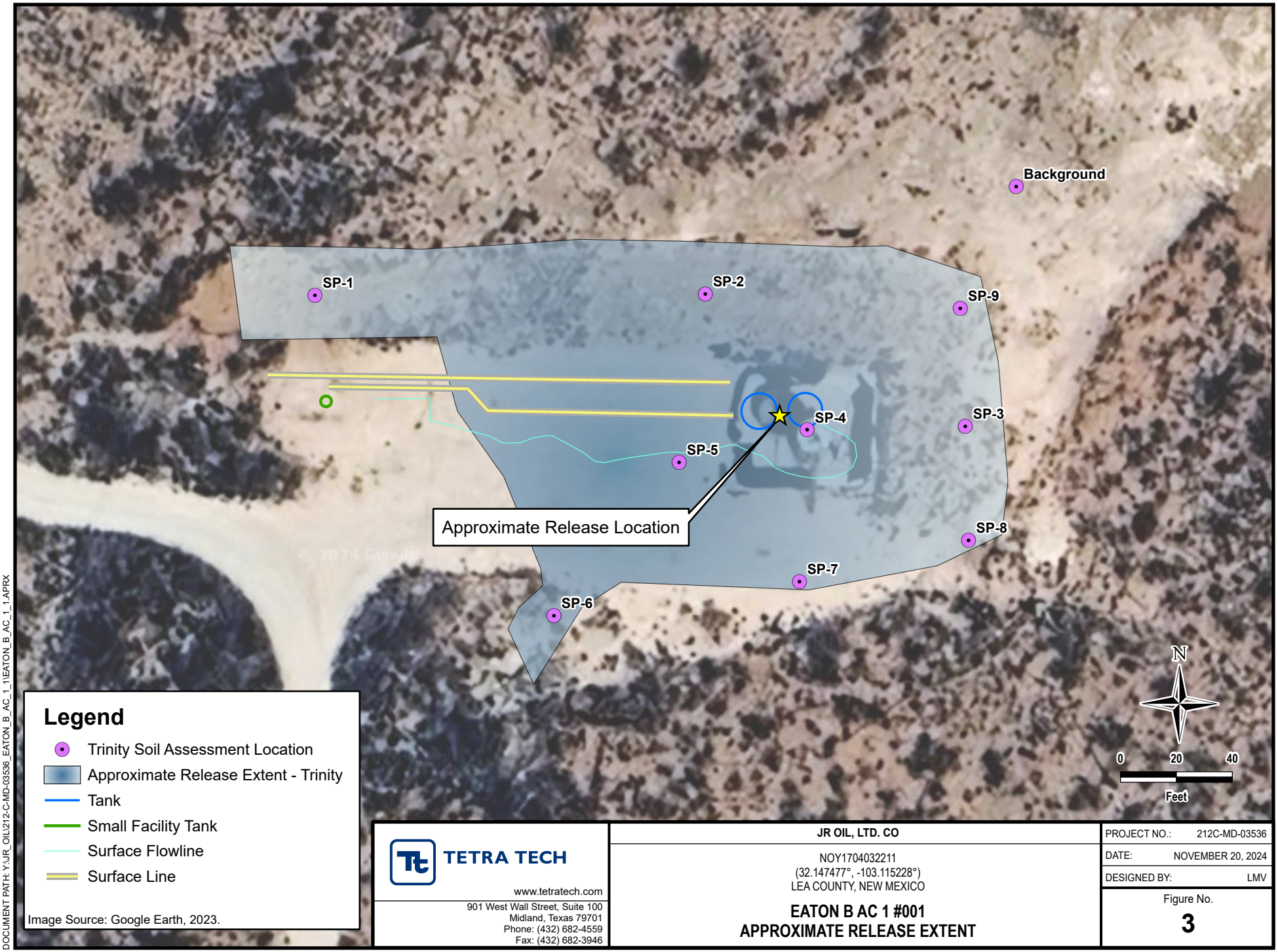
JR OIL, LTD. CO

NOY1704032211
(32.147477°, -103.115228°)
LEA COUNTY, NEW MEXICO

EATON B AC 1 #001
TOPOGRAPHIC MAP

PROJECT NO.:	212C-MD-03536
DATE:	NOVEMBER 20, 2024
DESIGNED BY:	LMV

Figure No.
2



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TETRA TECH

www.tetratech.com

901 West Wall Street, Suite 100
Midland, Texas 79701
Phone: (432) 682-4559
Fax: (432) 682-3946

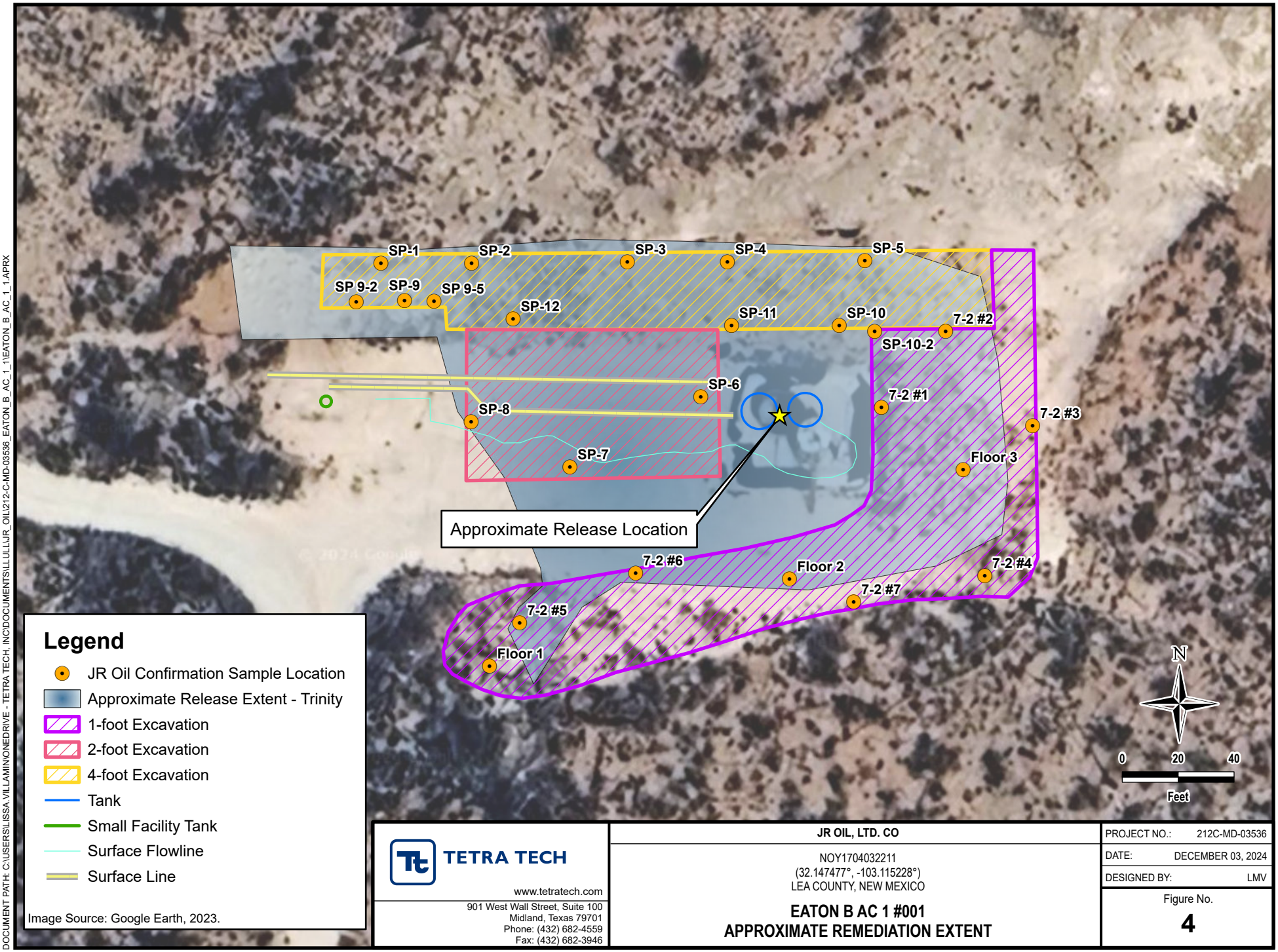
JR OIL, LTD. CO

NOY1704032211
(32.147477°, -103.115228°)
LEA COUNTY, NEW MEXICO

EATON B AC 1 #001
APPROXIMATE RELEASE EXTENT

PROJECT NO.:	212C-MD-03536
DATE:	NOVEMBER 20, 2024
DESIGNED BY:	LMV

Figure No.
3



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TETRA TECH

www.tetratech.com

901 West Wall Street, Suite 100
Midland, Texas 79701
Phone: (432) 682-4559
Fax: (432) 682-3946

JR OIL, LTD. CO

NOY1704032211
(32.147477°, -103.115228°)
LEA COUNTY, NEW MEXICO

EATON B AC 1 #001
APPROXIMATE REMEDIATION EXTENT

PROJECT NO.:	212C-MD-03536
DATE:	DECEMBER 03, 2024
DESIGNED BY:	LMV

Figure No.
4

TABLES

TABLE 1
SUMMARY OF ANALYTICAL RESULTS
2017 TRINITY SOIL ASSESSMENT - NOY1704032211/1RP-4591
JR OIL LTD. CO.
EATON B AC 1 #001 RELEASE
LEA COUNTY, NM

Sample ID	Sample Date	Sample Depth	Chloride[1]		BTEX[2]										TPH[3]							
					Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		EXT DRO		Total TPH
															C_6 - C_{10}		> C_{10} - C_{28}		> C_{28} - C_{36}		(GRO+DRO+EXT DRO)
		ft. bgs	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg
SP1-0	2/24/2017	Surface	**848**		10.5		95.8		77.7		181		**365**		3,630		29,500		14,200		**47,330**
SP1-1	2/24/2017	1'	-		<0.050		0.167		0.237		1.11		1.52		11.7		98.0		56.5		166
SP1-3	2/24/2017	3'	-		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		19.6		<10.0		19.6
SP1-4	2/24/2017	4'	-		<0.050		0.282		0.736		2.36		3.38		27.5		377		133		538
SP1-11	4/19/2017	11'	**848**		<0.050		0.105		0.075		0.293		0.473		<10.0		236		77.9		314
SP2-0	2/24/2017	Surface	**1,090**		<0.050		0.244		0.112		0.255		0.611		<50.0		2,470		1100		**3,570**
SP2-1	2/24/2017	1'	-		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0
SP2-3	2/24/2017	3'	-		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0
SP2-4	2/24/2017	4'	-		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0
SP2-6	4/19/2017	6'	**1260**		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0
SP2-10	4/19/2017	10'	**1040**		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0
SP2-13	4/19/2017	13'	**800**		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0
SP3-0	2/24/2017	Surface	80.0		<0.050		0.096		<0.050		<0.150		0.096		<10.0		311		178		489
SP3-1	2/24/2017	1'	-		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		12.0		12.0
SP3-2	2/24/2017	2'	-		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		18.1		18.5		36.6
SP3-11	4/19/2017	11'	192		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0
SP4-0	2/24/2017	Surface	**3840**		**30.3**		262		220		549		**1,060**		9,750		37,500		7,150		**54,400**
SP4-1	2/24/2017	1'	-		<0.050		0.078		0.056		0.24		0.374		<10.0		<10.0		<10.0		<10.0
SP4-2	2/24/2017	3'	-		<0.050		0.123		0.291		0.966		1.38		<10.0		102		56.9		159
SP4-3	2/24/2017	5'	-		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0
SP4-4	2/24/2017	8'	-		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		100		49.7		150
SP4-5	4/17/2017	11'	**1,200**		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0
SP5-0	2/24/2017	Surface	**1380**		0.082		0.986		0.69		1.72		3.48		<100		23,900		17,900		**41,800**
SP5-1	2/24/2017	1'	-		<0.050		0.08		0.563		2.01		2.65		94.1		1,200		903		**2,197**
SP5-3	2/24/2017	3'	-		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		99.9		93.5		193
SP5-11	4/17/2017	11'	304		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0
SP6-0	2/24/2017	Surface	**4320**		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		174		43.2		217
SP6-1	2/24/2017	1'	-		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0
SP6-11	4/17/2017	11'	352		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0
SP7-0	4/17/2017	Surface	64.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		261		258		519
SP7-1	4/17/2017	1'	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0
SP7-3	4/17/2017	3'	64.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0
SP7-4	4/17/2017	4'	64.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0
SP7-5	4/17/2017	5'	32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0
SP7-11	4/17/2017	11'	64.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0

Bold and italicized values indicate exceedance of approved Remediation Levels

NOTES:

ft. Feet

bgs Below ground surface

mg/kg Milligrams per kilogram

TPH Total Petroleum Hydrocarbons

GRO Gasoline range organics

DRO Diesel range organics

1 Method EPA 300 & SM4500Cl-B

2 Method EPA SW 846-, 50308021B

3 Method 8015M

QUALIFIERS:

TABLE 2
SUMMARY OF ANALYTICAL RESULTS
2018 INITIAL CONFIRMATION SAMPLES - NOY1704032211/1RP-4591
JR OIL LTD. CO.
EATON B AC 1 #001 RELEASE
LEA COUNTY, NM

Sample ID	Sample Date	Sample Depth	Chloride[1]		BTEX[2]									
					Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX	
		ft. bgs	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q
Floor #1	3/22/2018	1'	-		<.00201		<.00201		<.00201		<.00201		<.00201	
Floor #2	3/22/2018	1'	-		<.00199		<.00199		<.00199		<.00200		<.00199	
Floor #3	3/22/2018	1'	-		<.00200		<.00200		<.00200		<.00200		<.00200	
Sidewall #1	3/20/2018	4'	10.3		-		-		-		-		-	
Sidewall #2	3/20/2018	4'	<4.99		-		-		-		-		-	
Sidewall #3	3/27/2018	4'	31.6		-		-		-		-		-	
Sidewall #4	3/27/2018	4'	13.7		-		-		-		-		-	
Sidewall #5	3/27/2018	4'	<4.99		-		-		-		-		-	
Sidewall #6	3/27/2018	2'	1570		-		-		-		-		-	
Sidewall #7	3/27/2018	2'	133		-		-		-		-		-	
Sidewall #8	3/27/2018	2'	42.S		-		-		-		-		-	
Sidewall #9	3/27/2018	4'	926		-		-		-		-		-	
Sidewall #10	3/27/2018	4'	557		-		-		-		-		-	
Sidewall #11	3/27/2018	4'	2170		-		-		-		-		-	
Sidewall #12	3/27/2018	4'	1900		-		-		-		-		-	
Sidewall #9-2	4/9/2018	4'	244		-		-		-		-		-	
Sidewall #9-3	4/9/2018	4'	508		-		-		-		-		-	
Sidewall #10-2	4/9/2018	4'	<4.98		-		-		-		-		-	
Sidewall SP #9-5	4/27/2018	4'	104		-		-		-		-		-	

1 Method EPA 300
2 Method 8021B

TABLE 3
SUMMARY OF ANALYTICAL RESULTS
2018 ADDITIONAL CONFIRMATION SAMPLES - NOY1704032211/1RP-4591

Sample ID	Sample Date	Sample Depth	Chloride[1]		BTEX[2]										TPH[3]							
					Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		EXT DRO		Total TPH	
															C_6 - C_{10}		> C_{10} - C_{28}		> C_{28} - C_{36}		(GRO+DRO+EXT DRO)	
		ft. bgs	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	
7-2 #1	7/2/2018	1'	<4.91		<.0100		<.0100		<.0100		<.0100		<.0100		16.4		57.1		<15.0		73.5	
7-2 #2	7/2/2018	1'	55		-		-	-	-		-		-		-		-		-		-	
7-2 #3	7/2/2018	1'	<4.97		-		-	-	-		-		-		-		-		-		-	
7-2 #4	7/2/2018	1'	<4.99		-		-	-	-		-		-		16.3		<15.0		<15.0		16.3	
7-2 #5	7/2/2018	1'	<4.94		-		-	-	-		-		-		-		-		-		-	
7-2 #6	7/2/2018	1'	<4.91		-		-	-	-		-		-		-		-		-		-	
7-2 #7	7/2/2018	1'	<4.95		-		-	-	-		-		-		-		-		-		-	

1 Method EPA 300
2 Method 8021B
3 Method 8015M

APPENDIX A
C-141 Forms

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

HOBBS OCD
JAN 19 2017
RECEIVED

State of New Mexico
Energy Minerals and Natural Resources

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

Form C-141
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company J R Oil Co. Ltd. Co.	Contact Joe Tippy
Address P.O. Box 2975, Hobbs, NM 88241	Telephone No. 575-390-1380
Facility Name Eaton B AC #1	Facility Type Tank Battery
Surface Owner Blocker Ranch	Mineral Owner Various private owners
	API No. 30-025-11549

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
G	12	25S	37E	1980	North	2310	East	Lea

Latitude _____ Longitude _____

NATURE OF RELEASE

Type of Release Oil and Water Spill	Volume of Release 202 BO / 43 BW	Volume Recovered Zero
Source of Release Tank	Date and Hour of Occurrence 1/15/17 5:00 a.m.	Date and Hour of Discovery 1/15/17 11:00 a.m.
Was Immediate Notice Given? ☒ Yes ☐ No ☐ Not Required	If YES, To Whom? Mark Whitaker	
By Whom? Joe Tippy	Date and Hour 1/16/17 11:00 a.m.	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

RECEIVED
By Olivia Yu at 8:55 am, Feb 09, 2017

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

Lightning struck the tank battery which resulted in a fire. Fire destroyed the tank battery. The fire department put out any remaining fire.

Describe Area Affected and Cleanup Action Taken.*

The oil was burned up in the fire; the oil tank was blown into the pasture. The fire resulted in a burned area of approximately 100 yards. Clean up is ongoing. Any contaminated soil will be removed and hauled to Sundance's facility. Once the cleanup is complete, a final report will be submitted with the details.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.

Signature: Debbie McKelvey	OIL CONSERVATION DIVISION
Printed Name: Debbie McKelvey	Approved by Environmental Specialist:
Title: Agent	Approval Date: 2/9/2017 Expiration Date:
E-mail Address: debmckelvey@earthlink.net	Conditions of Approval: see attached directive Attached ☑
Date: 1/17/17 Phone: 575-392-3575	

1RP-4591 nOY1704032211 pOY1704032535

Form C-141
Page 3

State of New Mexico
Oil Conservation Division

Incident ID	nOY1704032211
District RP	1RP-4591
Facility ID	
Application ID	

Site Assessment/Characterization

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

What is the shallowest depth to groundwater beneath the area affected by the release?	90 (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ☑ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ☑ 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)?	☐ Yes ☑ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☑ 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?	☐ Yes ☑ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☑ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☑ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☑ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☑ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☑ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☑ No
Did the release impact areas **not** on an exploration, development, production, or storage site?	☐ Yes ☑ No

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

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

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

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

Form C-141
Page 4

State of New Mexico
Oil Conservation Division

Incident ID	nOY1704032211
District RP	1RP-4591
Facility ID	
Application ID	

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

Printed Name: Joe Tippy Title: President

Signature: Joe Tippy Date: 12/18/24

email: joetippy@valornet.com Telephone: 575-390-1380

OCD Only

Received by: _____ Date: _____

Form C-141
Page 6

State of New Mexico
Oil Conservation Division

Incident ID	nOY1704032211
District RP	1RP-4591
Facility ID	
Application ID	

Closure

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

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

☑ A scaled site and sampling diagram as described in 19.15.29.11 NMAC

☑ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)

☑ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)

☑ Description of remediation activities

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

Printed Name: Joe N. Tippy Title: President

Signature: [signature] Date: 12/18/2024

email: joetippy@valornet.com Telephone: 575-390-1380

OCD Only

Received by: _____ Date: _____

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

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____

APPENDIX B
Regulatory Correspondence

From: Yu, Olivia, EMNRD
To: "Ben J. Arguijo"
Cc: Trinity
Subject: RE: Spill Remediation Plan - Eaton B AC #1 (1RP-4591)
Date: Friday, October 6, 2017 8:54:00 AM
Attachments: approved_1RP4591_Eaton_SpillRemediationPlan.pdf

Mr. Arguijo:

Thank you for your prompt response. NMOCD approves of the proposed remediation plan for 1RP-4591. Please see the attachment for your records.

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

From: Ben J. Arguijo [mailto:ben@trinityoilfieldservices.com]
Sent: Friday, October 6, 2017 8:48 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Trinity <todd@trinityoilfieldservices.com>
Subject: Re: Spill Remediation Plan - Eaton B AC #1 (1RP-4591)

Good morning, Olivia.

Yes, the liner sections will be chemically welded together.

Yes, the sampling will be conducted in stages. We will request permission from the NMOCD before installing each liner and backfilling each section of the excavation. Photo documentation, laboratory analytical reports, etc., will be provided with each of those requests, as well as with the final closure report.

I will provide a proposed timeline at a later date. I will need to confer with the client beforehand.

Thanks.

Ben

Ben J. Arguijo
Environmental Project Manager
Trinity Oilfield Services
P.O. Box 2587
Hobbs, NM 88241
(575)390-7208
ben@trinityoilfieldservices.com

On Fri, Oct 6, 2017 at 7:39 AM, Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

> Good morning Mr. Arguijo:
>
> NMOCD will approve of the delineation as completed for 1RP-4591.
>
> For the remediation plan, please clarify what is meant by stitching the various pieces of the liner together. Do you mean welding? Provide a timeline of proposed work and sufficient photo documentation, demonstrating that the liners are properly aligned and seamless along the edges. Will confirmation bottom and sidewalls be taken in stages, in conjunction with the excavation and placement of the 20 mil liner for each area?
>
> Thanks,
> Olivia
>
> **From:** Ben J. Arguijo [mailto:ben@trinityoilfieldservices.com]
> **Sent:** Tuesday, October 3, 2017 12:39 PM
> **To:** Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
> **Cc:** Trinity <todd@trinityoilfieldservices.com>
> **Subject:** Re: Spill Remediation Plan - Eaton B AC #1 (1RP-4591)
>
> Olivia,
>
> 1. That was a typo. The area of SB-1 will be excavated to a depth of 4' bgs, along with boreholes SP-1, SP-2, and SP-9. I apologize for the confusion.
> 2.
>   - As we discussed during our meeting on 9/6, the proposed remediation activities will be conducted in phases, and there will be different liner depths. However, the edges of the individual liners will ultimately be stitched together to form one continuous surface. As far as size, the horizontal dimensions of each section of liner will be determined by the final dimensions of each section of the excavation(s). The liners will all be 20 mils in thickness.
>   - I will send the requested map under separate cover at a later date. Please note that the actual dimensions of the installed liners may vary somewhat from those depicted in the map.
> 3. The on-site storage tanks are presently in the area represented by borehole SP-4.
> 4. Yes, the tank battery will be lined independently of the excavation(s).
>
> Thanks.
>
> Ben
>
> Ben J. Arguijo

Environmental Project Manager
Trinity Oilfield Services
P.O. Box 2587
Hobbs, NM 88241
(575)390-7208
ben@trinityoilfieldservices.com

On Wed, Sep 27, 2017 at 1:49 PM, Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

> Mr. Arguijo:
>
> Please address these concerns regarding 1RP-4591.
>
> 1. What is the rationale for 1 ft. excavation for the area represented by SB1.
> 2. Provide a scaled map with these items demarcated:
>
> - Areas with different proposed depths of excavation,
> - Outlines of the locations and dimensions of the proposed liners. As written, due to the differing proposed depths of excavation, will there will be various liner sizes and depths in order of the liner to be properly keyed?
>
> 3. Where are the onsite storage tanks located?
> 4. Will the tank battery be lined?
>
> Please be advised that soil temperature and holding time for samples taken on April 19 and delivered to Cardinal Laboratories on April 25, 2017 are not optimal.
>
> Thanks,
> Olivia
>
> **From:** Ben J. Arguijo [mailto:ben@trinityoilfieldservices.com]
> **Sent:** Wednesday, September 6, 2017 2:40 PM
> **To:** Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
> **Cc:** Trinity <todd@trinityoilfieldservices.com>
> **Subject:** Spill Remediation Plan - Eaton B AC #1 (1RP-4591)
>
> Olivia,
>
> Per our meeting earlier this afternoon, attached please find the *Environmental Site Summary & Spill Remediation Plan* for the Eaton B AC #1 release site (1RP-4591). Trinity is prepared to begin the proposed remediation activities upon your review and approval.
>
> If you should have any questions, comments, or concerns, please do not hesitate to contact me.
>
> Thank you for your time and consideration.
>
> Ben

Ben J. Arguijo
Environmental Project Manager
Trinity Oilfield Services
P.O. Box 2587
Hobbs, NM 88241
(575)390-7208
ben@trinityoilfieldservices.com

From: joetippy@valornet.com
To: Yu, Olivia, EMNRD
Subject: Re: Labs for chloride testing
Date: Tuesday, February 27, 2018 5:46:04 PM

Olivia,
I appreciate your time and the information this morning. I will keep you informed on the progress

Thanks, Joe

From: "Olivia.yu@state.nm.us" <Olivia.Yu@state.nm.us>
To: joetippy@valornet.com
Sent: Tuesday, February 27, 2018 11:34:33 AM
Subject: Labs for chloride testing

Mr. Tippy:

Nice to see you again this morning for a discussion on course of action for 1RP-4591. A short summary of our discussion:

1. Excavate 4 ft. with minimal 20 mil liner in the area North of the pad (area represented by SP1, SP2, SP9).
2. Confirmation sidewall samples for chlorides in 50 ft. intervals.
3. Bottom samples needed only for areas not lined. Areas, which require confirmation bottom samples tested for BTEX and/or TPH extended, are based on tabulated data in the approved delineation plan.
4. In the remediation plan, provide an appropriately scaled map with 1) GPS coordinates of the bottom and sidewall confirmation samples (can be tabulated); 2) lined areas outlined and dimensions of the excavated area that is redrawn; and 4) annotate depth(s) of excavation.
5. If a site visit is requested, provide 48 hours advance notice.

If there are missing or miscommunicated information, please inform or provide clarification.

///
As requested, a list of labs that routinely test chlorides using EPA 300. Standard turnaround time is about 5 days except for Cardinal.

Cardinal lab: uses Green Analytical laboratories in Durango, Colorado.
Hall Environmental Analysis lab: Albuquerque
Permian Basin Environmental lab: Midland
Xenco: service center in Hobbs, nearest labs in Midland/Odessa, and Lubbock.

Thanks,

Olivia Yu

Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

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: Yu, Olivia, EMNRD
To: "Maren Latimer"; "joetippy@valornet.com"
Subject: RE: JR Oil Co. Eaton BAC Remediation
Date: Thursday, June 21, 2018 3:00:00 PM

Mr. Tippy:

Please address following concerns regarding the remediation report for 1RP-4591.

1. There may have been some miscommunication during the meeting on February 27, 2018. Please be advised that generally, confirmation sidewall samples are required for each area with a different excavation depth. For example, sidewall/edge samples were expected at the border between the 4 ft. (red) and 2 ft. (blue) areas and the border between the 4 ft. and 1 ft. (green) area. Do you have field tests to represent the change in excavation depth with permissible levels of BTEX, chlorides, and TPH extended demonstrated?
2. Were confirmation samples taken from the edge of the 1 ft. excavation (green)?
3. Does delineation sample location SP-9 fall within the 4 ft. or 2 ft. excavation area?
4. A bottom confirmation sample will be required at 2 ft. bgs for the area represented by delineation sample location SP-5. Laboratory analyses of TPH extended and chlorides are required.
5. What is the pile South of SP-9 area? Is this stockpiled soil?
6. Was impacted soil removed and area lined before the reestablishment of the battery? It is situated over delineation sample point SP-4, which had elevated BTEX and TPH extended up to a 1 ft. in depth and above permissible chloride levels at 11 ft. bgs. If not, this would explain the above permissible chloride levels for sidewall samples SP-10 and SP-12. Were confirmation bottom and sidewall samples taken for this area around the bermed tank battery?

Thanks,
Olivia

From: Maren Latimer <Maren.Latimer@nmoilpatch.com>
Sent: Friday, June 1, 2018 8:20 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: JR Oil Co. Eaton BAC Remediation

Good Morning,
Per the request of Joe Tippy of JR Oil Co., I have attached a copy of the remediation plan subsequent to the initial report filed. Please don't hesitate to call/email me if you have any questions or need anything further.

Thank you,

Maren Latimer
Petroleum Asset Management
Oil Patch Accounting

(575) 392-8252

Lynx Petroleum Consultants, Inc.

(575) 392-6950

From: joetippy@valornet.com
To: Yu, Olivia, EMNRD
Subject: RE: JR Oil Co. Eaton BAC Remediation
Date: Friday, June 29, 2018 5:49:40 PM

Ms. Yu,
This looks to be just what we concluded this morning, I will provide updates on each process. Thanks for your help.
Joe
----- Original Message -----
From: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
To: joetippy@valornet.com
Cc: Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>
Sent: Fri, 29 Jun 2018 18:22:20 -0400 (EDT)
Subject: RE: JR Oil Co. Eaton BAC Remediation

Mr. Tippy:

A pleasure to see you this morning at 10:30 am MST regarding 1RP-4591. Please inform if the below information was miscommunicated or if there are missing information.

- As the areas represented by SP-12 will be lined, a confirmation bottom sample is not required.
- The areas represented by SP-10 and SP-12 will be lined and welded to the liner currently in place under the tank battery. No additional confirmation samples are required for this area.
- The area for the tank battery had a 4 ft. excavation and lined with minimal 20 mil liner before filling with pea gravel.

These additional confirmation samples will be taken in the 1 ft. excavation area. See attachment. Please review. Several sampling locations may be missing from the annotated map.
1. Confirmation sidewall sample to represent SP-4 delineation sample location will be analyzed for BTEX, TPH, and chlorides.
2. Confirmation sidewall samples will be taken for chloride analyses at the East border and North and South of the pasture area.
3. A bottom confirmation sample will be taken for chloride analyses in the vicinity of the Floor 1 area.
3. Confirmation sidewall sample for TPH extended analyses will be taken in the area represented by the SP-8 delineation sample location.

In the closure report, please include these items:
1. Scaled map with confirmation sample locations marked in relation to initial confirmation and delineation sample locations.
2. Laboratory analyses with chain of custody. Please remember to maintain proper soil sampling conditions and temperatures.
3. Dated photo documentation of the remediation process, including the proper emplacement of the liners.
4. A short summary of the remediation conducted with dimensions of areas impacted and tabulated GPS coordinates of confirmation sample locations.
5. Signed final C-141.

NMOCD advises that the second set of confirmation sample data be submitted for review before backfilling. Please inform if clarification is required.

Thanks,
Olivia

-----Original Message-----
From: joetippy@valornet.com <joetippy@valornet.com>

Sent: Wednesday, June 27, 2018 12:40 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: RE: JR Oil Co. Eaton BAC Remediation

Ms. Yu,
Yes ma'am Friday 6/29 at 10:30am will work.
I will see you then.
Thanks, Joe

----- Original Message -----
From: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
To: joetippy@valornet.com
Cc: Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>
Sent: Wed, 27 Jun 2018 12:39:56 -0400 (EDT)
Subject: RE: JR Oil Co. Eaton BAC Remediation

Good morning Mr. Tippy:

Pardon for missing your call and delayed response. Are you available at 10:30 am MST this Friday, June 29, 2018? If not, please propose alternative times and dates.

Thanks,
Olivia

-----Original Message-----
From: joetippy@valornet.com <joetippy@valornet.com>
Sent: Tuesday, June 26, 2018 10:30 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: RE: JR Oil Co. Eaton BAC Remediation

Ms. Yu
Can we set a time this week for me to come meet with you on the concerns you have.
I would like to leave with a list of things to complete so we can finish this remediation.
Anytime you are available I will try to make.
Thanks, Joe 575-390-1380

----- Original Message -----
From: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
To: Maren Latimer <Maren.Latimer@nmoilpatch.com>, joetippy@valornet.com
Sent: Thu, 21 Jun 2018 17:01:00 -0400 (EDT)
Subject: RE: JR Oil Co. Eaton BAC Remediation

Mr. Tippy:

Please address following concerns regarding the remediation report for 1RP-4591.

1. There may have been some miscommunication during the meeting on February 27, 2018. Please be advised that generally, confirmation sidewall samples are required for each area with a different excavation depth. For example, sidewall/edge samples were expected at the border between the 4 ft. (red) and 2 ft. (blue) areas and the border between the 4 ft. and 1 ft. (green) area. Do you have field tests to represent the change in excavation depth with permissible levels of BTEX, chlorides, and TPH extended demonstrated?
2. Were confirmation samples taken from the edge of the 1 ft. excavation (green)?
3. Does delineation sample location SP-9 fall within the 4 ft. or 2 ft. excavation area?
4. A bottom confirmation sample will be required at 2 ft. bgs for the area represented by delineation sample location SP-5. Laboratory analyses of TPH extended and chlorides are required.
5. What is the pile South of SP-9 area? Is this stockpiled soil?
6. Was impacted soil removed and area lined before the reestablishment of the battery? It is situated over

delineation sample point SP-4, which had elevated BTEX and TPH extended up to a 1 ft. in depth and above permissible chloride levels at 11 ft. bgs. If not, this would explain the above permissible chloride levels for sidewall samples SP-10 and SP-12. Were confirmation bottom and sidewall samples taken for this area around the bermed tank battery?

Thanks,
Olivia

From: Maren Latimer <Maren.Latimer@nmoilpatch.com>
Sent: Friday, June 1, 2018 8:20 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: JR Oil Co. Eaton BAC Remediation

Good Morning,
Per the request of Joe Tippy of JR Oil Co., I have attached a copy of the remediation plan subsequent to the initial report filed. Please don't hesitate to call/email me if you have any questions or need anything further.

Thank you,

Maren Latimer
Petroleum Asset Management
Oil Patch Accounting
(575) 392-8252
Lynx Petroleum Consultants, Inc.
(575) 392-6950

Figure 1 Sample Location Map

From: Yu, Olivia, EMNRD
To: Maren Latimer; joetippy@valornet.com
Cc: Hernandez, Christina, EMNRD
Subject: RE: JR Oil Eaton BAC
Date: Tuesday, July 31, 2018 12:30:00 PM
Attachments: approved_1RP4591_Updated JR BAC Project.pdf

Mr. Tippy:

Thank you for your patience and compliance. NMOCD approves of the remediation thus far completed for 1RP-4591. Backfill approval and liner emplacement approved.

Please remember to submit dated photo documentation along with the final C-141 and short remediation/closure summary.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

From: Maren Latimer <Maren.Latimer@nmoilpatch.com>
Sent: Wednesday, July 18, 2018 9:57 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: JR Oil Eaton BAC

Good Morning,
Per the request of Joe Tippy of JR Oil Co., I have attached a copy of the updated remediation plan/ sample test results requested at your meeting with him on June 29th. Please don't hesitate to call/email me if you have any questions or need anything further.

Maren Latimer
Petroleum Asset Management
Oil Patch Accounting
(575) 392-8252

Lynx Petroleum Consultants, Inc.
(575) 392-6950

APPENDIX C
Updated Closure Report

JR OIL LTD. CO.
ENVIRONMENTAL SITE SUMMARY & SPILL REMEDIATION PLAN

Company: JR Oil Ltd. Co. **Address:** P.O. Box 2975 Hobbs, NM 88241 **Telephone #:** (575) 390-1380

Site Name: Eaton B AC #1 **NM OCD Reference #:** 1RP-4591

Surface Owner: Private **Mineral Owner:** Private

Unit Letter: "G" (SW/NE) **Section**: 12 **Township**: 25S **Range**: 37E **County**: Lea

GPS Coordinates: 32.147477 **N** -103.115228 **W** **Depth to Ground Water:** 90'

NM OCD Ranking Score: 0 **Soil Remediation Levels (mg/kg) Benzene:** 10 **BTEX:** 50 **Chloride:** 250

Date/Time of Release: 1/15/2017, 5:00 AM **Type of Release:** Produced water & crude oil

Approximate Volume of Release: See below

Background Information:

On January 15, 2017, JR Oil, Ltd. Co. (JR Oil), discovered a release at the Eaton B AC #1 tank battery. Lightning struck the tank battery, which resulted in a fire and the release of approximately 202 barrels (bbls) of crude oil and 43 bbls of produced water. The release impacted an area of the tank battery pad and adjacent pasture measuring approximately 100 yards. The majority of the crude oil was consumed by the fire.

The release was reported to the New Mexico Oil Conservation Division's (NMOCD) Hobbs District office on January 16, 2017. The NMOCD "Release Notification & Corrective Action" (Form C-141) is provided as Appendix A. General photographs of the release site are provided in Attachment B. A "Sample Location Map" is provided as Figure 1.

Summary of Field Activities:

This summary is a subsequent account of activities performed after the June 29, 2018 meeting with Olivia Yu at the OCD office.

On July 2, 2018, per the meeting with Olivia Yu, the additional requested samples were taken and the results are shown in the updated lab report and map.

Proposed Activities:

After the findings of the subsequent samples, JR Oil requests approval from the NM OCD to line, cover, and complete remediation as was discussed in the June 29, 2018 meeting with Olivia Yu at the NM OCD office.

Enclosures:

Figure 1: Updated Sample Location Map and list of coordinates
Table 1: Concentrations of BTEX, Chloride and TPH in soil
Appendix A: Laboratory Analytical Results

APPROVED
By Olivia Yu at 12:26 pm, Jul 31, 2018

NMOCD approves of the remediation completed for 1RP-4591. Backfill approval and liner placement granted.

FIGURE 1
Updated Sample Location Map and List of Coordinates

Figure 1-Sample Location Map

Updated To Reflect Required action from 6-29/2018 meeting

GPS COORDINATES OF SAMPLE POINTS FROM FIGURE 1

7-2 #1	32° 08.845'N	-103° 06.876'W
7-2 #2	32° 08.851'N	-103° 06.869' W
7-2 #3	32° 08.845'N	-103° 06.863' W
7-2 #4	32° 08.837'N	-103° 06.868' W
7-2 #5	32° 08.834'N	-103° 06.899' W
7-2 #6	32° 08.837'N	-103° 06.880' W
7-2 #7	32° 08.835'N	-103° 06.891' W

TABLE 1

Updated Sample Table

TABLE 1
CONCENTRATION OF BTEX, CHLORIDE & TPH IN SOIL

JR OIL LTD. CO.
EATON B AC #1
LEA COUNTY, NEW MEXICO
NMOCD REF. #: 1RP-4591

SAMPLE LOCATION	SAMPLE DEPTH (BGS)	SAMPLE DATE	METHOD: EPA 8021B					METHOD: EPA 300	METHOD: SW8015 MOD			
			BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYLBENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)	TOTAL BTEX (mg/Kg)	CHLORIDE (mg/Kg)	GRO (mg/Kg)	DRO (mg/Kg)	ORO (mg/Kg)	TOTAL TPH (mg/Kg)
7-2 #1	1'	7/2/2018	<.0100	<.0100	<.0100	<.0100	<.0100	<4.91	16.4	57.1	<15.0	73.5
7-2 #2	1'	7/2/2018						55.4				
7-2 #3	1'	7/2/2018						<4.97				
7-2 #4	1'	7/2/2018						<4.99	16.3	<15	<15	16.3
7-2 #5	1'	7/2/2018						<4.94				
7-2 #6	1'	7/2/2018						<4.91				
7-2 #7	1'	7/2/2018						<4.95				

APPENDIX A
LABORATORY ANALYTICAL REPORTS

Certificate of Analysis Summary 591180

J R Oil Ltd., Hobbs, NM

Project Name: Eaton B AC

Project Id:

Contact: Joe Tippy

Project Location:

Date Received in Lab: Tue Jul-03-18 10:52 am

Report Date: 13-JUL-18

Project Manager: Holly Taylor

Analysis Requested													
	Lab Id:	591180-001		591180-002		591180-003		591180-004		591180-005		591180-006	
	Field Id:	7-2-#1 "Rsf Sp-4"		7-2-#2		7-2-#3		7-2-#4 "Rsf Sp-8"		7-2-#5 "Rsf floor #1"		7-2-#6 "Rsf Sp-7"	
	Depth:	1- ft		1- ft		1- ft		1- ft		1- ft		1- ft	
	Matrix:	SOIL		SOIL		SOIL		SOIL		SOIL		SOIL	
	Sampled:	Jul-02-18 11:45		Jul-02-18 11:50		Jul-02-18 11:50		Jul-02-18 11:50		Jul-02-18 11:55		Jul-02-18 12:20	
BTEX by EPA 8021B	***Extracted:***	Jul-09-18 07:40											
	Analyzed:	Jul-10-18 07:32											
	Units/RL:	mg/kg	RL										
Benzene		<0.0100	0.0100										
Toluene		<0.0100	0.0100										
Ethylbenzene		<0.0100	0.0100										
m,p-Xylenes		<0.0200	0.0200										
o-Xylene		<0.0100	0.0100										
Total Xylenes		<0.0100	0.0100										
Total BTEX		<0.0100	0.0100										
Chloride by EPA 300	***Extracted:***	Jul-11-18 10:45		Jul-11-18 10:45		Jul-11-18 10:45		Jul-11-18 10:45		Jul-11-18 10:45		Jul-11-18 10:45	
	Analyzed:	Jul-11-18 11:34		Jul-11-18 11:50		Jul-11-18 11:56		Jul-11-18 12:01		Jul-11-18 12:06		Jul-11-18 12:23	
	Units/RL:	mg/kg	RL	mg/kg	RL	mg/kg	RL	mg/kg	RL	mg/kg	RL	mg/kg	RL
Chloride		<4.91	4.91	55.4	4.98	<4.97	4.97	<4.99	4.99	<4.94	4.94	<4.91	4.91
TPH By SW8015 Mod	***Extracted:***	Jul-09-18 07:00						Jul-09-18 07:00					
	Analyzed:	Jul-09-18 12:03						Jul-09-18 12:23					
	Units/RL:	mg/kg	RL					mg/kg	RL				
Gasoline Range Hydrocarbons (GRO)		16.4	15.0					16.3	15.0				
Diesel Range Organics (DRO)		57.1	15.0					<15.0	15.0				
Oil Range Hydrocarbons (ORO)		<15.0	15.0					<15.0	15.0				
Total TPH		73.5	15.0					16.3	15.0				

Houston - Dallas - San Antonio - Atlanta - Tampa - Boca Raton - Latin America - Odessa - Corpus Christi

Holly Taylor
Project Manager

Final 1.000

Certificate of Analysis Summary 591180

J R Oil Ltd., Hobbs, NM

Project Name: Eaton B AC

Project Id:

Contact: Joe Tippy

Project Location:

Date Received in Lab: Tue Jul-03-18 10:52 am

Report Date: 13-JUL-18

Project Manager: Holly Taylor

Analysis Requested							
	Lab Id:	591180-007					
	Field Id:	7-2-#7					
	Depth:	1- ft					
	Matrix:	SOIL					
	Sampled:	Jul-02-18 12:20					
Chloride by EPA 300	***Extracted:***	Jul-11-18 10:45					
	Analyzed:	Jul-11-18 12:28					
	Units/RL:	mg/kg RL					
Chloride		<4.95 4.95					

Holly Taylor
Project Manager

Analytical Report 591180

for

J R Oil Ltd.

Project Manager: Joe Tippy

Eaton B AC

13-JUL-18

Collected By: Client

1211 W. Florida Ave, Midland TX 79701

Xenco-Houston (EPA Lab Code: TX00122):
Texas (T104704215-18-26), Arizona (AZ0765), Florida (E871002-24), Louisiana (03054)
Oklahoma (2017-142)

Xenco-Dallas (EPA Lab Code: TX01468):
Texas (T104704295-17-16), Arizona (AZ0809), Arkansas (17-063-0)

Xenco-El Paso (EPA Lab Code: TX00127): Texas (T104704221-17-12)
Xenco-Lubbock (EPA Lab Code: TX00139): Texas (T104704219-17-16)
Xenco-Odessa (EPA Lab Code: TX00158): Texas (T104704400-18-15)
Xenco-San Antonio (EPA Lab Code: TNI02385): Texas (T104704534-17-3)
Xenco Phoenix (EPA Lab Code: AZ00901): Arizona (AZ0757)
Xenco-Phoenix Mobile (EPA Lab Code: AZ00901): Arizona (AZM757)
Xenco-Atlanta (LELAP Lab ID #04176)
Xenco-Tampa: Florida (E87429)
Xenco-Lakeland: Florida (E84098)

XENCO LABORATORIES

13-JUL-18

Project Manager: **Joe Tippy**
J R Oil Ltd.
PO Box 2975
Hobbs, NM 88241

Reference: XENCO Report No(s): **591180**
Eaton B AC
Project Address:

Joe Tippy:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number(s) 591180. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. The uncertainty of measurement associated with the results of analysis reported is available upon request. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 591180 will be filed for 45 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

Holly Taylor
Project Manager

Sample Cross Reference 591180

J R Oil Ltd., Hobbs, NM

Eaton B AC

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
7-2-#1 "Rsf Sp-4"	S	07-02-18 11:45	1 ft	591180-001
7-2-#2	S	07-02-18 11:50	1 ft	591180-002
7-2-#3	S	07-02-18 11:50	1 ft	591180-003
7-2-#4 "Rsf Sp-8"	S	07-02-18 11:50	1 ft	591180-004
7-2-#5 "Rsf floor #1"	S	07-02-18 11:55	1 ft	591180-005
7-2-#6 "Rsf Sp-7"	S	07-02-18 12:20	1 ft	591180-006
7-2-#7	S	07-02-18 12:20	1 ft	591180-007

CASE NARRATIVE

Client Name: J R Oil Ltd.
Project Name: Eaton B AC

Project ID:
Work Order Number(s): *591180*

Report Date: *13-JUL-18*
Date Received: *07/03/2018*

Sample receipt non conformances and comments:

None

Sample receipt non conformances and comments per sample:

None

Analytical non conformances and comments:

Batch: LBA-3056046 BTEX by EPA 8021B
Soil samples were not received in Terracore kits and therefore were prepared by method 5030.

XENCO LABORATORIES

Certificate of Analytical Results 591180

J R Oil Ltd., Hobbs, NM

Eaton B AC

Sample Id:	**7-2-#1 "Rsf Sp-4"**	Matrix:	Soil	Date Received:	07.03.18 10.52
Lab Sample Id:	591180-001	Date Collected:	07.02.18 11.45	Sample Depth:	1 ft

Analytical Method:	Chloride by EPA 300			Prep Method:	E300P
Tech:	SCM			% Moisture:	
Analyst:	SCM	Date Prep:	07.11.18 10.45	Basis:	Wet Weight
Seq Number:	3056218				

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	<4.91	4.91	mg/kg	07.11.18 11.34	U	1

Analytical Method:	TPH By SW8015 Mod			Prep Method:	TX1005P
Tech:	ARM			% Moisture:	
Analyst:	ARM	Date Prep:	07.09.18 07.00	Basis:	Wet Weight
Seq Number:	3055934				

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons (GRO)	PHC610	**16.4**	15.0	mg/kg	07.09.18 12.03		1
Diesel Range Organics (DRO)	C10C28DRO	**57.1**	15.0	mg/kg	07.09.18 12.03		1
Oil Range Hydrocarbons (ORO)	PHCG2835	<15.0	15.0	mg/kg	07.09.18 12.03	U	1
Total TPH	PHC635	**73.5**	15.0	mg/kg	07.09.18 12.03		1

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
1-Chlorooctane	111-85-3	92	%	70-135	07.09.18 12.03	
o-Terphenyl	84-15-1	91	%	70-135	07.09.18 12.03	

Certificate of Analytical Results 591180

J R Oil Ltd., Hobbs, NM

Eaton B AC

Sample Id:	**7-2-#1 "Rsf Sp-4"**	Matrix:	Soil	Date Received:	07.03.18 10.52
Lab Sample Id:	591180-001	Date Collected:	07.02.18 11.45	Sample Depth:	1 ft
Analytical Method:	BTEX by EPA 8021B			Prep Method:	SW5030B
Tech:	ALJ			% Moisture:	
Analyst:	ALJ	Date Prep:	07.09.18 07.40	Basis:	Wet Weight
Seq Number:	3056046				

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Benzene	71-43-2	<0.0100	0.0100	mg/kg	07.10.18 07.32	U	1
Toluene	108-88-3	<0.0100	0.0100	mg/kg	07.10.18 07.32	U	1
Ethylbenzene	100-41-4	<0.0100	0.0100	mg/kg	07.10.18 07.32	U	1
m,p-Xylenes	179601-23-1	<0.0200	0.0200	mg/kg	07.10.18 07.32	U	1
o-Xylene	95-47-6	<0.0100	0.0100	mg/kg	07.10.18 07.32	U	1
Total Xylenes	1330-20-7	<0.0100	0.0100	mg/kg	07.10.18 07.32	U	1
Total BTEX		<0.0100	0.0100	mg/kg	07.10.18 07.32	U	1

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
4-Bromofluorobenzene	460-00-4	98	%	70-130	07.10.18 07.32	
1,4-Difluorobenzene	540-36-3	128	%	70-130	07.10.18 07.32	

XENCO LABORATORIES

Certificate of Analytical Results 591180

J R Oil Ltd., Hobbs, NM

Eaton B AC

Sample Id:	**7-2-#2**	Matrix:	Soil	Date Received:	07.03.18 10.52
Lab Sample Id:	591180-002	Date Collected:	07.02.18 11.50	Sample Depth:	1 ft
Analytical Method:	Chloride by EPA 300			Prep Method:	E300P
Tech:	SCM			% Moisture:	
Analyst:	SCM	Date Prep:	07.11.18 10.45	Basis:	Wet Weight
Seq Number:	3056218				

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	**55.4**	4.98	mg/kg	07.11.18 11.50		1

Certificate of Analytical Results 591180

J R Oil Ltd., Hobbs, NM

Eaton B AC

Sample Id:	7-2-#3	Matrix:	Soil	Date Received:	07.03.18 10.52
Lab Sample Id:	591180-003	Date Collected:	07.02.18 11.50	Sample Depth:	1 ft
Analytical Method:	Chloride by EPA 300			Prep Method:	E300P
Tech:	SCM			% Moisture:	
Analyst:	SCM	Date Prep:	07.11.18 10.45	Basis:	Wet Weight
Seq Number:	3056218				

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	<4.97	4.97	mg/kg	07.11.18 11.56	U	1

XENCO LABORATORIES

Certificate of Analytical Results 591180

J R Oil Ltd., Hobbs, NM

Eaton B AC

Sample Id:	**7-2-#4 "Rsf Sp-8"**	Matrix:	Soil	Date Received:	07.03.18 10.52
Lab Sample Id:	591180-004	Date Collected:	07.02.18 11.50	Sample Depth:	1 ft

Analytical Method:	Chloride by EPA 300			Prep Method:	E300P
Tech:	SCM			% Moisture:	
Analyst:	SCM	Date Prep:	07.11.18 10.45	Basis:	Wet Weight
Seq Number:	3056218				

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	<4.99	4.99	mg/kg	07.11.18 12.01	U	1

Analytical Method:	TPH By SW8015 Mod			Prep Method:	TX1005P
Tech:	ARM			% Moisture:	
Analyst:	ARM	Date Prep:	07.09.18 07.00	Basis:	Wet Weight
Seq Number:	3055934				

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons (GRO)	PHC610	**16.3**	15.0	mg/kg	07.09.18 12.23		1
Diesel Range Organics (DRO)	C10C28DRO	<15.0	15.0	mg/kg	07.09.18 12.23	U	1
Oil Range Hydrocarbons (ORO)	PHCG2835	<15.0	15.0	mg/kg	07.09.18 12.23	U	1
Total TPH	PHC635	**16.3**	15.0	mg/kg	07.09.18 12.23		1

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
1-Chlorooctane	111-85-3	91	%	70-135	07.09.18 12.23	
o-Terphenyl	84-15-1	87	%	70-135	07.09.18 12.23	

XENCO LABORATORIES

Certificate of Analytical Results 591180

J R Oil Ltd., Hobbs, NM

Eaton B AC

Sample Id:	**7-2-#5 "Rsf floor #1"**	Matrix:	Soil	Date Received:	07.03.18 10.52
Lab Sample Id:	591180-005	Date Collected:	07.02.18 11.55	Sample Depth:	1 ft
Analytical Method:	Chloride by EPA 300			Prep Method:	E300P
Tech:	SCM			% Moisture:	
Analyst:	SCM	Date Prep:	07.11.18 10.45	Basis:	Wet Weight
Seq Number:	3056218				

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	<4.94	4.94	mg/kg	07.11.18 12.06	U	1

Certificate of Analytical Results 591180

J R Oil Ltd., Hobbs, NM

Eaton B AC

Sample Id:	**7-2-#6 "Rsf Sp-7"**	Matrix:	Soil	Date Received:	07.03.18 10.52
Lab Sample Id:	591180-006	Date Collected:	07.02.18 12.20	Sample Depth:	1 ft
Analytical Method:	Chloride by EPA 300			Prep Method:	E300P
Tech:	SCM			% Moisture:	
Analyst:	SCM	Date Prep:	07.11.18 10.45	Basis:	Wet Weight
Seq Number:	3056218				

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	<4.91	4.91	mg/kg	07.11.18 12.23	U	1

XENCO LABORATORIES

Certificate of Analytical Results 591180

J R Oil Ltd., Hobbs, NM

Eaton B AC

Sample Id:	7-2-#7	Matrix:	Soil	Date Received:	07.03.18 10.52
Lab Sample Id:	591180-007	Date Collected:	07.02.18 12.20	Sample Depth:	1 ft
Analytical Method:	Chloride by EPA 300			Prep Method:	E300P
Tech:	SCM			% Moisture:	
Analyst:	SCM	Date Prep:	07.11.18 10.45	Basis:	Wet Weight
Seq Number:	3056218				

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	<4.95	4.95	mg/kg	07.11.18 12.28	U	1

XENCO LABORATORIES

Flagging Criteria

X In our quality control review of the data a QC deficiency was observed and flagged as noted. MS/MSD recoveries were found to be outside of the laboratory control limits due to possible matrix /chemical interference, or a concentration of target analyte high enough to affect the recovery of the spike concentration. This condition could also affect the relative percent difference in the MS/MSD.

B A target analyte or common laboratory contaminant was identified in the method blank. Its presence indicates possible field or laboratory contamination.

D The sample(s) were diluted due to targets detected over the highest point of the calibration curve, or due to matrix interference. Dilution factors are included in the final results. The result is from a diluted sample.

E The data exceeds the upper calibration limit; therefore, the concentration is reported as estimated.

F RPD exceeded lab control limits.

J The target analyte was positively identified below the quantitation limit and above the detection limit.

U Analyte was not detected.

L The LCS data for this analytical batch was reported below the laboratory control limits for this analyte. The department supervisor and QA Director reviewed data. The samples were either reanalyzed or flagged as estimated concentrations.

H The LCS data for this analytical batch was reported above the laboratory control limits. Supporting QC Data were reviewed by the Department Supervisor and QA Director. Data were determined to be valid for reporting.

K Sample analyzed outside of recommended hold time.

JN A combination of the "N" and the "J" qualifier. The analysis indicates that the analyte is "tentatively identified" and the associated numerical value may not be consistent with the amount actually present in the environmental sample.

** Surrogate recovered outside laboratory control limit.

BRL Below Reporting Limit.

RL Reporting Limit

MDL Method Detection Limit **SDL** Sample Detection Limit **LOD** Limit of Detection

PQL Practical Quantitation Limit **MQL** Method Quantitation Limit **LOQ** Limit of Quantitation

DL Method Detection Limit

NC Non-Calculable

SMP Client Sample **BLK** Method Blank

BKS/LCS Blank Spike/Laboratory Control Sample **BKSD/LCSD** Blank Spike Duplicate/Laboratory Control Sample Duplicate

MD/SD Method Duplicate/Sample Duplicate **MS** Matrix Spike **MSD:** Matrix Spike Duplicate

+ NELAC certification not offered for this compound.

* (Next to analyte name or method description) = Outside XENCO's scope of NELAC accreditation

XENCO LABORATORIES

QC Summary 591180

J R Oil Ltd.

Eaton B AC

Analytical Method: Chloride by EPA 300 — Prep Method: E300P
Seq Number: 3056218 — Matrix: Solid — Date Prep: 07.11.18
MB Sample Id: 7658208-1-BLK — LCS Sample Id: 7658208-1-BKS — LCSD Sample Id: 7658208-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	<5.00	250	257	103	270	108	90-110	5	20	mg/kg	07.11.18 11:23	

Analytical Method: Chloride by EPA 300 — Prep Method: E300P
Seq Number: 3056218 — Matrix: Soil — Date Prep: 07.11.18
Parent Sample Id: 591180-001 — MS Sample Id: 591180-001 S — MSD Sample Id: 591180-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	<4.91	246	247	100	257	104	90-110	4	20	mg/kg	07.11.18 11:39	

Analytical Method: Chloride by EPA 300 — Prep Method: E300P
Seq Number: 3056218 — Matrix: Soil — Date Prep: 07.11.18
Parent Sample Id: 591241-003 — MS Sample Id: 591241-003 S — MSD Sample Id: 591241-003 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	5.91	249	255	100	257	101	90-110	1	20	mg/kg	07.11.18 12:55	

Analytical Method: TPH By SW8015 Mod — Prep Method: TX1005P
Seq Number: 3055934 — Matrix: Solid — Date Prep: 07.09.18
MB Sample Id: 7658090-1-BLK — LCS Sample Id: 7658090-1-BKS — LCSD Sample Id: 7658090-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Gasoline Range Hydrocarbons (GRO)	<15.0	1000	970	97	961	96	70-135	1	20	mg/kg	07.09.18 08:29	
Diesel Range Organics (DRO)	<15.0	1000	989	99	979	98	70-135	1	20	mg/kg	07.09.18 08:29	

Surrogate	MB %Rec	MB Flag	LCS %Rec	LCS Flag	LCSD %Rec	LCSD Flag	Limits	Units	Analysis Date
1-Chlorooctane	100		127		122		70-135	%	07.09.18 08:29
o-Terphenyl	104		116		112		70-135	%	07.09.18 08:29

MS/MSD Percent Recovery [D] = 100*(C-A) / B
Relative Percent Difference RPD = 200* | (C-E) / (C+E) |
LCS/LCSD Recovery [D] = 100 * (C) / [B]
Log Difference Log Diff. = Log(Sample Duplicate) - Log(Original Sample)

LCS = Laboratory Control Sample
A = Parent Result
C = MS/LCS Result
E = MSD/LCSD Result

MS = Matrix Spike
B = Spike Added
D = MSD/LCSD % Rec

QC Summary 591180

J R Oil Ltd.

Eaton B AC

Analytical Method: TPH By SW8015 Mod
Prep Method: TX1005P
Seq Number: 3055934
Matrix: Soil
Date Prep: 07.09.18
Parent Sample Id: 591176-001
MS Sample Id: 591176-001 S
MSD Sample Id: 591176-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Gasoline Range Hydrocarbons (GRO)	<15.0	999	966	97	963	96	70-135	0	20	mg/kg	07.09.18 09:27	
Diesel Range Organics (DRO)	<15.0	999	985	99	998	100	70-135	1	20	mg/kg	07.09.18 09:27	

Surrogate	MS %Rec	MS Flag	MSD %Rec	MSD Flag	Limits	Units	Analysis Date
1-Chlorooctane	121		120		70-135	%	07.09.18 09:27
o-Terphenyl	107		103		70-135	%	07.09.18 09:27

Analytical Method: BTEX by EPA 8021B
Prep Method: SW5030B
Seq Number: 3056046
Matrix: Solid
Date Prep: 07.09.18
MB Sample Id: 7658167-1-BLK
LCS Sample Id: 7658167-1-BKS
LCSD Sample Id: 7658167-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Benzene	<0.0100	0.500	0.459	92	0.484	97	70-130	5	35	mg/kg	07.10.18 05:08	
Toluene	<0.0100	0.500	0.499	100	0.497	99	70-130	0	35	mg/kg	07.10.18 05:08	
Ethylbenzene	<0.0100	0.500	0.462	92	0.502	100	70-130	8	35	mg/kg	07.10.18 05:08	
m,p-Xylenes	<0.0200	1.00	0.950	95	1.05	105	70-130	10	35	mg/kg	07.10.18 05:08	
o-Xylene	<0.0100	0.500	0.451	90	0.486	97	70-130	7	35	mg/kg	07.10.18 05:08	

Surrogate	MB %Rec	MB Flag	LCS %Rec	LCS Flag	LCSD %Rec	LCSD Flag	Limits	Units	Analysis Date
1,4-Difluorobenzene	94		95		98		70-130	%	07.10.18 05:08
4-Bromofluorobenzene	95		92		91		70-130	%	07.10.18 05:08

Analytical Method: BTEX by EPA 8021B
Prep Method: SW5030B
Seq Number: 3056046
Matrix: Soil
Date Prep: 07.09.18
Parent Sample Id: 591451-001
MS Sample Id: 591451-001 S
MSD Sample Id: 591451-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Benzene	<0.0100	0.500	0.291	58	0.354	71	70-130	20	35	mg/kg	07.10.18 05:44	X
Toluene	<0.0100	0.500	0.229	46	0.330	66	70-130	36	35	mg/kg	07.10.18 05:44	XF
Ethylbenzene	<0.0100	0.500	0.167	33	0.287	57	70-130	53	35	mg/kg	07.10.18 05:44	XF
m,p-Xylenes	<0.0200	1.00	0.331	33	0.560	56	70-130	51	35	mg/kg	07.10.18 05:44	XF
o-Xylene	<0.0100	0.500	0.157	31	0.287	57	70-130	59	35	mg/kg	07.10.18 05:44	XF

Surrogate	MS %Rec	MS Flag	MSD %Rec	MSD Flag	Limits	Units	Analysis Date
1,4-Difluorobenzene	124		99		70-130	%	07.10.18 05:44
4-Bromofluorobenzene	88		91		70-130	%	07.10.18 05:44

MS/MSD Percent Recovery [D] = 100*(C-A) / B
Relative Percent Difference RPD = 200* | (C-E) / (C+E) |
LCS/LCSD Recovery [D] = 100 * (C) / [B]
Log Difference Log Diff. = Log(Sample Duplicate) - Log(Original Sample)

LCS = Laboratory Control Sample
A = Parent Result
C = MS/LCS Result
E = MSD/LCSD Result

MS = Matrix Spike
B = Spike Added
D = MSD/LCSD % Rec

5 lbs 10x8x8 Tracking # 6660639173537

ANALYSIS REQUEST & CHAIN OF CUSTODY RECORD

XENCO Laboratories

☐ 4143 Greenbriar Drive, Stafford, TX 77477 **281-240-4200**
☐ 5332, Blackberry Drive, San Antonio, TX 78238 **210-509-3334**
☐ 9701 Harry Hines Blvd., Dallas, TX 75220 **214-902-0300**
☐ 12600 West I-20 East, Odessa, TX 79765 **432-563-1800**

Serial #: 330880 Page of

Company-City JR Oil Ltd Hobbs N.M. **Phone** 575-390-1380	**Lab Only:** 591180
Project Name-Location Eaton B A C ☒ Previously done at XENCO **Project ID**	**TAT:** ASAP 5h 12h 24h 48h 3d 5d 7d 10d 21d Standard TAT is project specific. It is typically 5-7 Working Days for level II and 10+ Working days for level III and IV data.
Proj. State: TX, AL, FL, GA, LA, MS, NC, NJ, PA, SC, TN, UT Other **Proj. Manager (PM)** Joe Tippy	
E-mail Results to ☐ PM and joetippy@valornet.com **Fax No:**	
Invoice to ☐ Accounting ☐ Inc. Invoice with Final Report ☐ Invoice must have a P.O. Bill to: Pay w Card	
Quote/Pricing: **P.O. No:** ☐ Call for P.O.	
Reg Program: UST DRY-CLEAN Land-Fill Waste-Disp NPDES DW **TRRP** QAPP Per-Contract CLP AGCEE NAVY DOE DOD USACE OTHER:	
Special DLs (GW DW QAPP MDLs RLs See Lab PM Included Call PM)	
Sampler Name Joe Tippy **Signature**	

	Sample ID	Sampling Date	Time	Depth ft' in" m	Matrix	Composite	Grab	# Containers	Container Size	Container Type	Preservatives	VOA: Full-List BTEX-MTBE EtOH Oxyg VOHs VOAs	VOA: PP TCL DW Appdx-1 Appdx-2 CALL Other:	PAHs SIM 8310 8270	TX-1005 DRO GRO MA EPH MA VPH	SVOCs: Full-List DW BN&AE TCLP PP Appdx-2 CALL	OC Pesticides PCBs Herbicides OP Pesticides	Metals: RCRA-8 RCRA-4 Pb 13PP 23TAL Appdx 1 Appdx2	SPLP - TCLP (Metals VOCs SVOCs Pest. Herb. PCBs)	EDB / DBCP	BTEX, TPH, Chlorides	Chlorides	TPH, Chlorides	TAT ASAP 5h 12h 24h 48h 3d 5d 7d 10d 21d	Addn: PAH above mg/L W, mg/Kg S Highest Hit	Hold Samples (Surcharges will apply and are pre-approved)	Remarks: Sample Clean-ups are pre-approved as needed	Addn: Date Rcv. by: From:	
1	7-2 #1 "Ref SP-4"	7/2/18	11:45 AM	1'				-													X								1
2	7-2 #2	7/2/18	11:50 AM	1'																		X							2
3	7-2 #3	7/2/18	11:50 AM	1'																		X							3
4	7-2 #4 "Ref SP-8"	7/2/18	11:50 AM	1'																			X						4
5	7-2 #5 "Ref Floor #1"	7/2/18	11:55 AM	1'																		X							5
6	7-2 #6 "Ref SP-7"	7/2/18	12:20 PM	1'																		X							6
7	7-2 #7	7/2/18	12:20 PM	1'																		X							7
8																													8
9																													9
10																													10

	Relinquished by (Initials and Sign)	Date & Time	Relinquished to (Initials and Sign)	Date & Time
1	1) JT	7/2/18 4:44 PM	2) Sheaves	7/2/18 4:47
2	3)		4) Rentel	7/3/18 1052
3	5)		6)	

Total Containers per COC: Cooler Temp: 4.3 °C

Otherwise agreed on writing. Reports are the Intellectual Property of XENCO until paid. Samples will be held 30 days after final report is e-mailed unless hereby requested. Rush Charges and Collection Fees are pre-approved if needed.

Preservatives: Various (**V**), HCl pH<2 (**H**), H2SO4 pH<2 (**S**), HNO3 pH<2 (**N**), Asbc Acid&NaOH (**A**), ZnAc&NaOH (**Z**), (Cool, <4C) (**C**), None (**NA**),See Label (**L**), Other (**O**) _____
Cont. Size: 4oz (**4**), 8oz (**8**), 32oz (**32**), 40ml VOA (**40**), 1L (**1**), 500ml (**5**), Tedlar Bag (**B**), Various (**V**), Other _____ **Cont. Type:** Glass Amb (**A**), Glass Clear (**C**), Plastic (**P**), Various (**V**)

Matrix: Air (**A**), Product (**P**), Solid (**S**), Water (**W**), Liquid (**L**)

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Final 1.000

XENCO Laboratories

Prelogin/Nonconformance Report- Sample Log-In

Client: J R Oil Ltd.

Date/ Time Received: 07/03/2018 10:52:00 AM

Work Order #: 591180

Acceptable Temperature Range: 0 - 6 degC
Air and Metal samples Acceptable Range: Ambient

Temperature Measuring device used : R8

Sample Receipt Checklist	Comments
#1 *Temperature of cooler(s)?	4.3
#2 *Shipping container in good condition?	Yes
#3 *Samples received on ice?	Yes
#4 *Custody Seals intact on shipping container/ cooler?	N/A
#5 Custody Seals intact on sample bottles?	N/A
#6*Custody Seals Signed and dated?	N/A
#7 *Chain of Custody present?	Yes
#8 Any missing/extra samples?	No
#9 Chain of Custody signed when relinquished/ received?	Yes
#10 Chain of Custody agrees with sample labels/matrix?	Yes
#11 Container label(s) legible and intact?	Yes
#12 Samples in proper container/ bottle?	Yes
#13 Samples properly preserved?	Yes
#14 Sample container(s) intact?	Yes
#15 Sufficient sample amount for indicated test(s)?	Yes
#16 All samples received within hold time?	Yes
#17 Subcontract of sample(s)?	N/A
#18 Water VOC samples have zero headspace?	N/A

*** Must be completed for after-hours delivery of samples prior to placing in the refrigerator**

Analyst:

PH Device/Lot#:

Checklist completed by: Brianna Teel Date: 07/03/2018
Brianna Teel

Checklist reviewed by: Holly Taylor Date: 07/03/2018
Holly Taylor

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

General Information
Phone: (505) 629-6116

Online Phone Directory
https://www.emnrd.nm.gov/ocd/contact-us

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

QUESTIONS

Action 421059

QUESTIONS

Operator: J R OIL, LTD. CO. P.O. Box 53657 Lubbock, TX 79453	OGRID: 256073
	Action Number: 421059
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	**nOY1704032211**
Incident Name	**NOY1704032211 EATON B AC 1 #001 @ 30-025-11549**
Incident Type	**Oil Release**
Incident Status	**Remediation Closure Report Received**
Incident Well	**[30-025-11549] EATON B AC 1 #001**

Location of Release Source	
Please answer all the questions in this group.	
Site Name	Eaton B AC 1 #001
Date Release Discovered	01/15/2017
Surface Owner	Private

Incident Details	
Please answer all the questions in this group.	
Incident Type	Oil 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	
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.	
Crude Oil Released (bbls) Details	Cause: Lightning | Tank (Any) | Crude Oil | Released: 202 BBL | Recovered: 0 BBL | Lost: 202 BBL.
Produced Water Released (bbls) Details	Cause: Lightning | Tank (Any) | Produced Water | Released: 43 BBL | Recovered: 0 BBL | Lost: 43 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)	*Not answered.*

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QUESTIONS (continued)

Operator: J R OIL, LTD. CO. P.O. Box 53657 Lubbock, TX 79453	OGRID: 256073
	Action Number: 421059
	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.**
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.	

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	No additional comments.
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: Brittany Long Title: Consultant Email: brittany.long@tetratech.com Date: 01/15/2025

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QUESTIONS (continued)

Operator: J R OIL, LTD. CO. P.O. Box 53657 Lubbock, TX 79453	OGRID: 256073
	Action Number: 421059
	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)	Between 75 and 100 (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 ½ and 1 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Greater than 5 (mi.)
Any other fresh water well or spring	Greater than 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	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Between ½ and 1 (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
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.	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No
Soil Contamination Sampling: (Provide the highest observable value for each, in milligrams per kilograms.)	
Chloride (EPA 300.0 or SM4500 Cl B)	4320
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	54400
GRO+DRO (EPA SW-846 Method 8015M)	49250
BTEX (EPA SW-846 Method 8021B or 8260B)	1060
Benzene (EPA SW-846 Method 8021B or 8260B)	30.3
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.	
On what estimated date will the remediation commence	03/05/2018
On what date will (or did) the final sampling or liner inspection occur	07/02/2018
On what date will (or was) the remediation complete(d)	07/18/2018
What is the estimated surface area (in square feet) that will be reclaimed	0
What is the estimated volume (in cubic yards) that will be reclaimed	0
What is the estimated surface area (in square feet) that will be remediated	22193
What is the estimated volume (in cubic yards) that will be remediated	1691
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 (continued)

Operator: J R OIL, LTD. CO. P.O. Box 53657 Lubbock, TX 79453	OGRID: 256073
	Action Number: 421059
	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.)	
(Ex Situ) Excavation and **off-site** disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for **off-site** disposal	OWL LANDFILL JAL [fJEG1635837366]
OR which OCD approved well (API) will be used for **off-site** disposal	*Not answered.*
OR is the **off-site** disposal site, to be used, out-of-state	*Not answered.*
OR is the **off-site** disposal site, to be used, an NMED facility	*Not answered.*
(Ex Situ) Excavation and **on-site** remediation (i.e. On-Site Land Farms)	No
(In Situ) Soil Vapor Extraction	No
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	No
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	No
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	No
Ground Water Abatement pursuant to 19.15.30 NMAC	No
OTHER (Non-listed remedial process)	No
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: Brittany Long Title: Consultant Email: brittany.long@tetratech.com Date: 01/15/2025
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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Santa Fe, NM 87505

QUESTIONS (continued)

Operator: J R OIL, LTD. CO. P.O. Box 53657 Lubbock, TX 79453	OGRID: 256073
	Action Number: 421059
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Deferral Requests Only *Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.*	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

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

General Information
Phone: (505) 629-6116

Online Phone Directory
https://www.emnrd.nm.gov/ocd/contact-us

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

QUESTIONS (continued)

Operator: J R OIL, LTD. CO. P.O. Box 53657 Lubbock, TX 79453	OGRID: 256073
	Action Number: 421059
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	**421158**
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	**07/02/2018**
What was the (estimated) number of samples that were to be gathered	**7**
What was the sampling surface area in square feet	**22193**

Remediation Closure Request	
Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.	
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	**No**
All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion	Yes
What was the total surface area (in square feet) remediated	22193
What was the total volume (cubic yards) remediated	1691
All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX, and 10 mg/kg Benzene	Yes
What was the total surface area (in square feet) reclaimed	22193
What was the total volume (in cubic yards) reclaimed	1691
Summarize any additional remediation activities not included by answers (above)	Liner was placed in bottom of excavations per NMOCD approved plans.

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: Brittany Long Title: Consultant Email: brittany.long@tetratech.com Date: 01/15/2025

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QUESTIONS (continued)

Operator:	OGRID:
J R OIL, LTD. CO. P.O. Box 53657 Lubbock, TX 79453	256073
	Action Number: 421059
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Reclamation Report	
Only answer the questions in this group if all reclamation steps have been completed.	
Requesting a reclamation approval with this submission	No

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CONDITIONS

Operator: J R OIL, LTD. CO. P.O. Box 53657 Lubbock, TX 79453	OGRID: 256073
	Action Number: 421059
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	We have received your Remediation Closure Report for Incident #NOY1704032211 EATON B AC 1 #001, thank you. This Remediation Closure Report is approved.	1/28/2025