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Oklahoma City, Oklahoma 73142
Tel. 832.374.0004
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January 15, 2025

Mike Bratcher
District Supervisor
Oil Conservation District
811 S. First Street
Artesia, New Mexico 88210

**Re: Incident Closure Report
Caza Operating, LLC
Eagle Claw Federal Com #001H
Unit D, Section 05, Township 20S, Range 35E
Site Coordinates: 32.609062, -103.486555
Lea County, New Mexico
Incident ID: nOY1809349107**

Introduction

NTG Environmental, LLC (NTGE), on behalf of Caza Operating, LLC (Caza), submits this Incident Closure Report to the New Mexico Oil Conservation Division (NMOCD). This report provides documentation of liner inspection activities conducted to date in the affected areas at the Eagle Claw Federal Com #001H (Site). The Site is in Unit Letter D, Section 05, of Township 20 South and Range 35 East in Lea County, New Mexico. The GPS coordinates for the release site are 32.609062° N Latitude and -103.486555° W Longitude. The Site location with respect to the nearest town is shown on Figure 1 and the topography of the area is shown on Figure 2.

Background

Based on the initial C-141 submitted by Caza and obtained by the New Mexico Oil Conservation District (NMOCD), the release was discovered on March 20, 2018. The release was the result of an equipment failure (treating tower), resulting in the release of twenty (20) barrels (bbls) of crude oil, of which nineteen (19) bbls were recovered for a net loss of one (1) bbls of crude oil. Upon discovery the well was shut-in, and the area was secured. The liner area is shown on Figure 3.

Groundwater and Site Characterization

Based on a review of the New Mexico Office of State Engineers and USGS databases, there are no known water sources within a ½-mile radius of the Site. No other receptors (playas, wetlands, waterways, lakebeds, or ordinance boundaries) are located within each specific boundary or distance from the Site. According to the Karst Potential Map, the Site is located within a Low

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Karst area. The Site characterization documentation (Points of Diversion, Karst Potential, Significant Watercourse Map, Wetlands Map, and FEMA Map) is attached to the report.

NTGE characterized the Site according to Table I, Closure Criteria for Soils Impacted by a Release, from the New Mexico Administrative Code (NMCA) Title 19, Chapter 15, Part 29, Section 12 (NMAC 19.15.29.12).

General Site Characterization and Groundwater:

Site Characterization	Average Groundwater Depth (ft)
Low Karst	Unknown

Table 3.1 Closure Criteria for Soils Impacted by a Release (NMAC 19.15.29.12 & 19.15.29.13)

Regulatory Standard	Chloride	TPH (GRO+DRO+MRO)	TPH (GRO+MRO)	BTEX	Benzene
19.15.29.12 NMAC Table I Closure Criteria for Soils Impacted by a Release	600 mg/kg	100 mg/kg	---	50 mg/kg	10 mg/kg
Notes: --- = not defined					

Liner Inspection Activities

On January 14, 2025, NTGE conducted a liner inspection to assess the integrity and state of the tank battery's secondary containment liner. Upon inspection it was noted that the liner was intact with no visible holes or breaches, and free of any standing fluids. A photographic log documenting the condition of the liner at the time of the inspection is attached.

Closure Request

Based on the liner inspection, the Site is compliant with NMOCD's regulatory requirements, and no further actions are required at the Site. Caza formally requests closure for the Site (**nOY1809349107**). If you have any questions regarding this report or need additional information, please contact us on (832) 374-0004.

Sincerely,

NTG Environmental



Kellan Smith
Project Manager

NTGE Project No: 248977

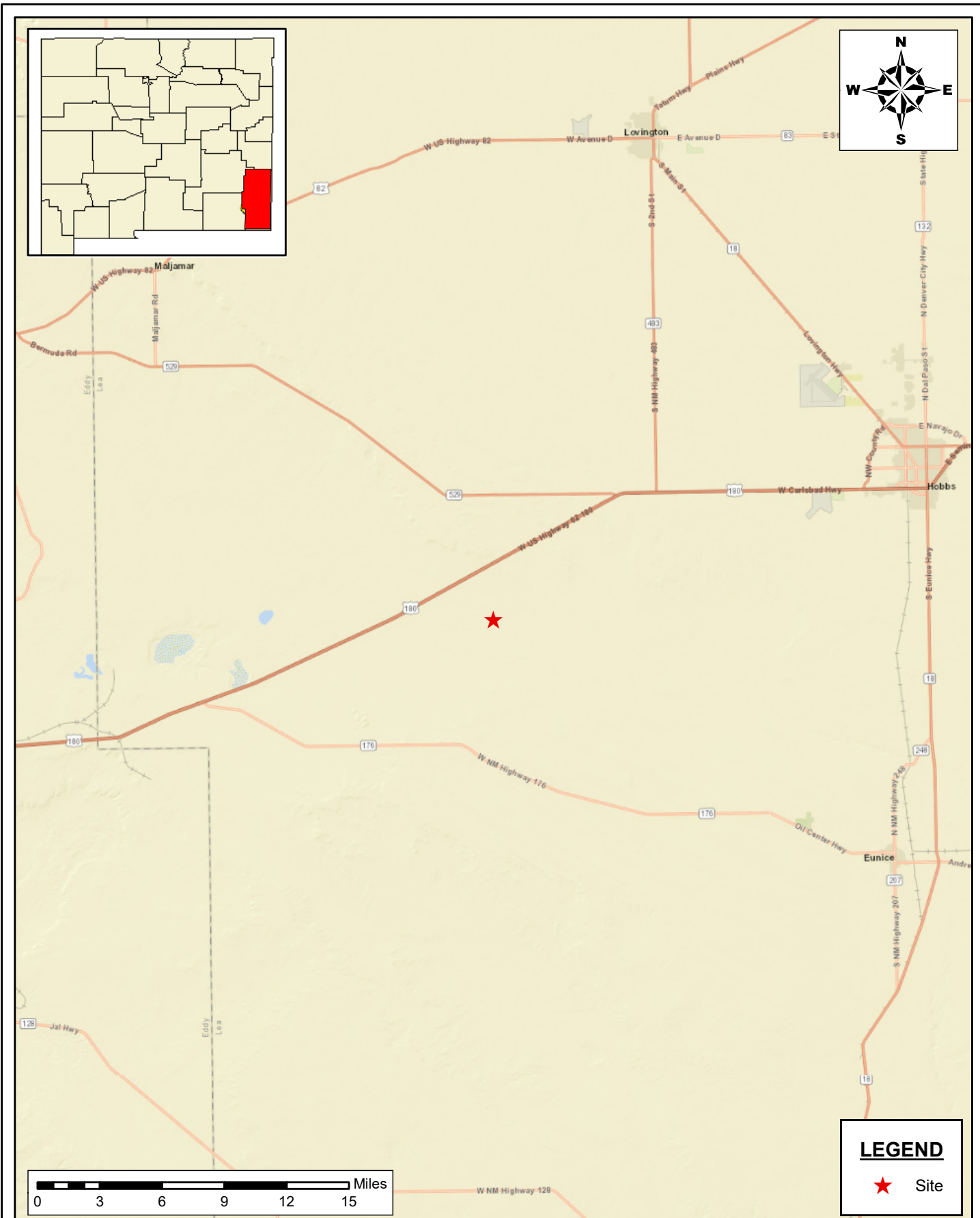


Attachments:

Figures
Site Characterization
Photographic Log

Figures

Document Path: C:\Users\ntg\gis\New Tech Global\NTGE - Projects\2024 PROJECTS\CAZARSC\248967 - Eagle Claw Federal Com #001H7 - Figures\GIS\Figure_1_SL.mxd



**SITE LOCATION MAP
INCIDENT CLOSURE REPORT
CAZA OPERATING, LLC
EAGLE CLAW FEDERAL COM #001H
LEA COUNTY, NEW MEXICO**



New Tech Global Environmental, LLC
911 Regional Park Drive
Houston, Texas 77060
T - 281.872.9300
F - 281.872.4521
Web: www.ntgenviroinmental.com

NOTES:

1. Base Image: ESRI Maps & Data 2013
2. Map Projection: NAD 1983

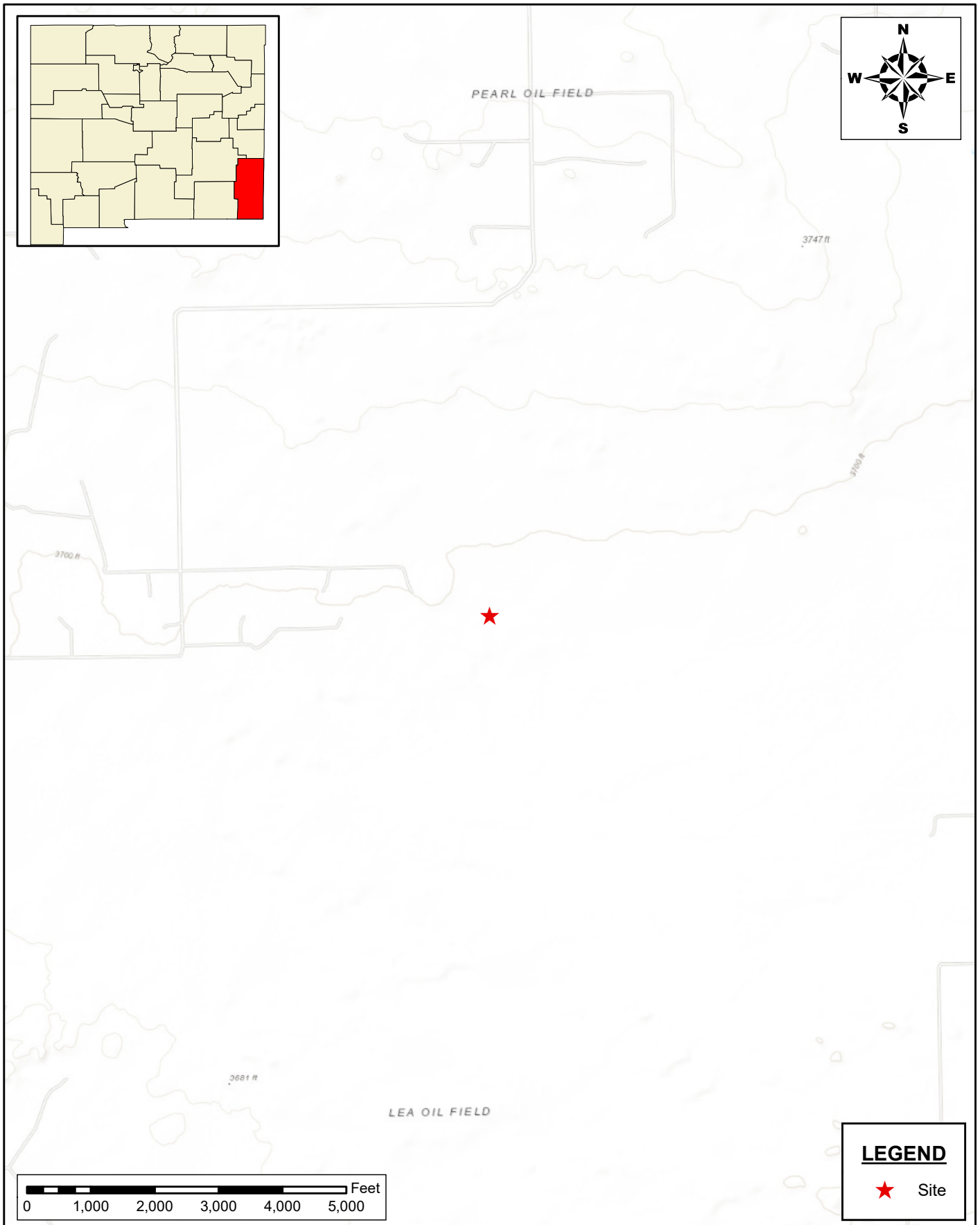
DRAWING NUMBER:

FIGURE 1

SHEET NUMBER:

1 of 1

Document Path: C:\Users\ntg\gis\New Tech Global\NTGE - Documents\NTGE - Projects\2024 PROJECTS\CAZA\RSC\248967 - Eagle Claw Federal Com #001H7 - Figures\GIS\Figure_2_TM.mxd



**TOPOGRAPHIC MAP
INCIDENT CLOSURE REPORT
CAZA OPERATING, LLC
EAGLE CLAW FEDERAL COM #001H
LEA COUNTY, NEW MEXICO**

SCALE: As Shown Date: 11/4/2024 PROJECT #: 248967



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NOTES:

1. Base Image: ESRI Maps & Data 2013
2. Map Projection: NAD 1983

DRAWING NUMBER:

FIGURE 2

SHEET NUMBER:

1 of 1

Document Path: C:\Users\ntgegis\New Tech Global\NTGE - Documents\NTGE - Projects\2024 PROJECTS\CAZA\CAZA\RSC\248980 - Sioux 25-36 CTB\7 - Figures\GIS\Figure_3_SC.mxd



**SECONDARY CONTAINMENT MAP
INCIDENT CLOSURE REPORT**
CAZA OPERATING, LLC
EAGLE CLAW FEDERAL COM #001H
LEA COUNTY, NEW MEXICO

SCALE: As Shown Date: 1/15/2025 PROJECT #: 248967



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NOTES:

1. Base Image: ESRI Maps & Data 2013
2. Map Projection: NAD 1983

DRAWING NUMBER:

FIGURE 3

SHEET NUMBER:

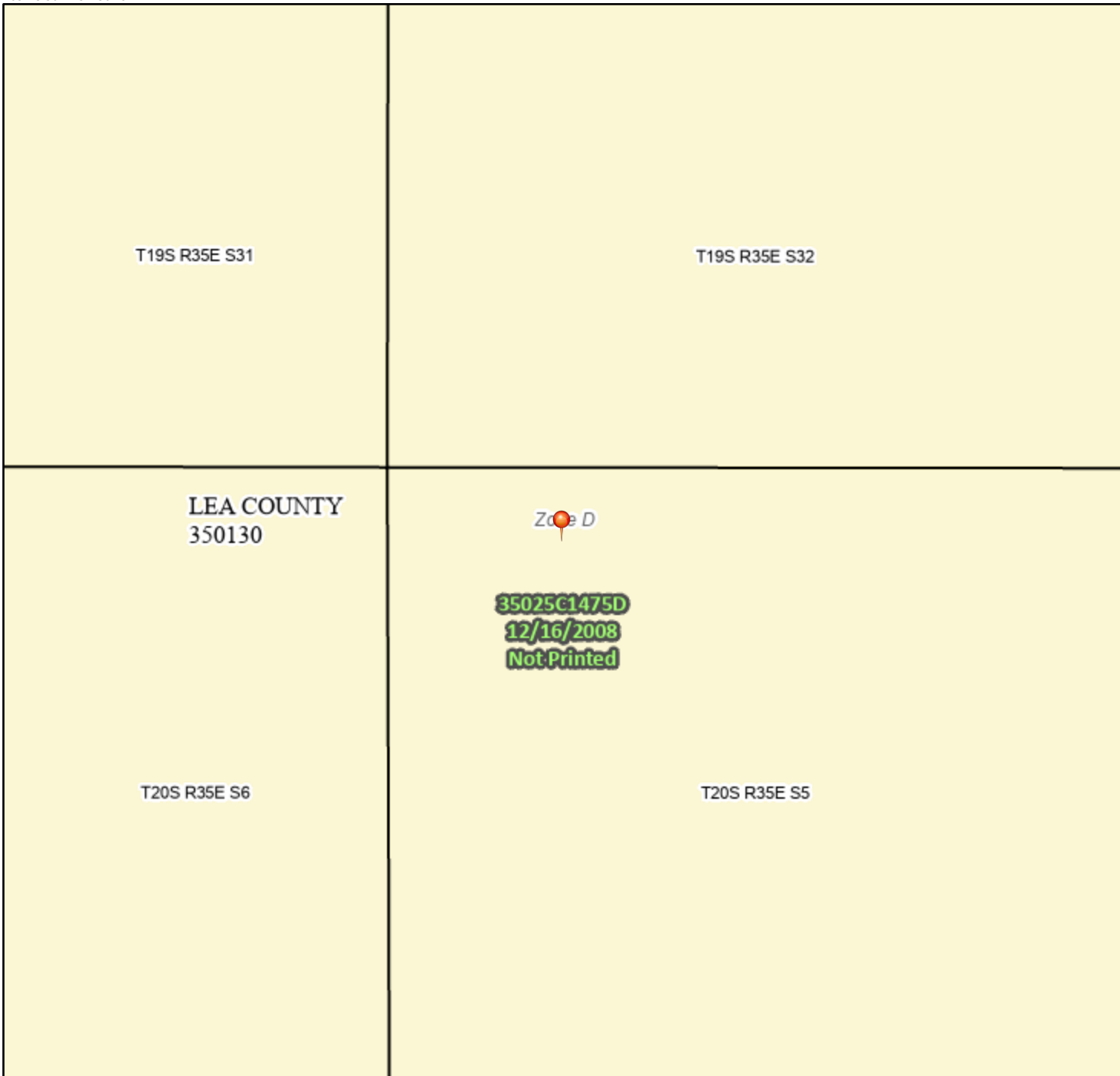
1 of 1

Site Characterization

National Flood Hazard Layer FIRMMette



103°29'30"W 32°36'48"N



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
OTHER AREAS OF FLOOD HAZARD		Regulatory Floodway
		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
OTHER AREAS		Area with Flood Risk due to Levee Zone D
		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
GENERAL STRUCTURES		Area of Undetermined Flood Hazard Zone D
		Channel, Culvert, or Storm Sewer
OTHER FEATURES		Levee, Dike, or Floodwall
		Cross Sections with 1% Annual Chance Water Surface Elevation
MAP PANELS		Coastal Transect
		Base Flood Elevation Line (BFE)
MAP PANELS		Limit of Study
		Jurisdiction Boundary
MAP PANELS		Coastal Transect Baseline
		Profile Baseline
MAP PANELS		Hydrographic Feature
		Digital Data Available
MAP PANELS		No Digital Data Available
		Unmapped



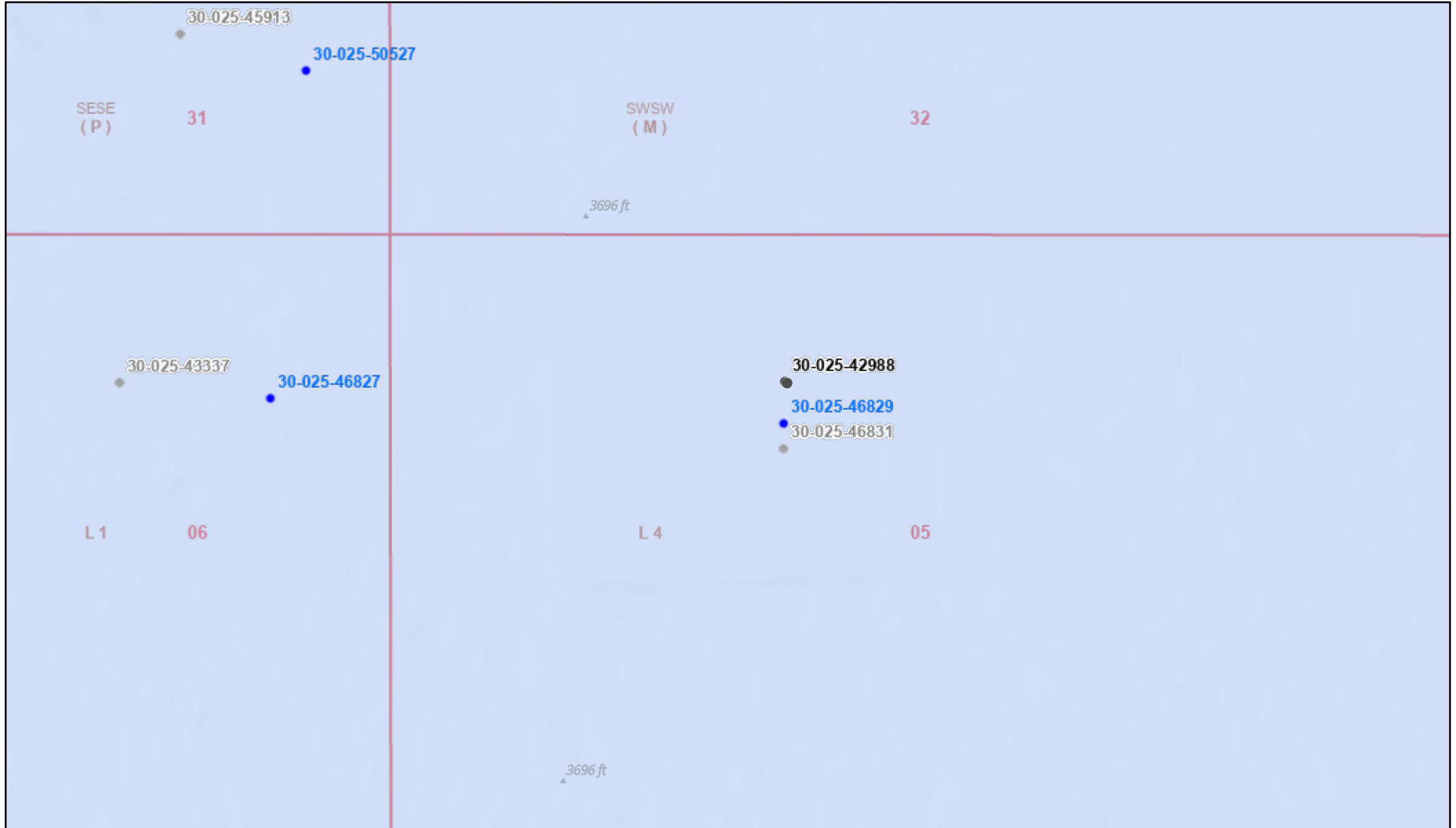
The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 7/30/2024 at 1:57 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

Karst Potential Map



7/30/2024, 11:58:58 AM

Wells - Large Scale

Oil, New

PLSS Second Division

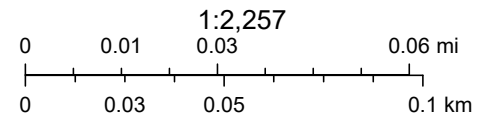
Oil, Active

Karst Occurrence Potential

PLSS First Division

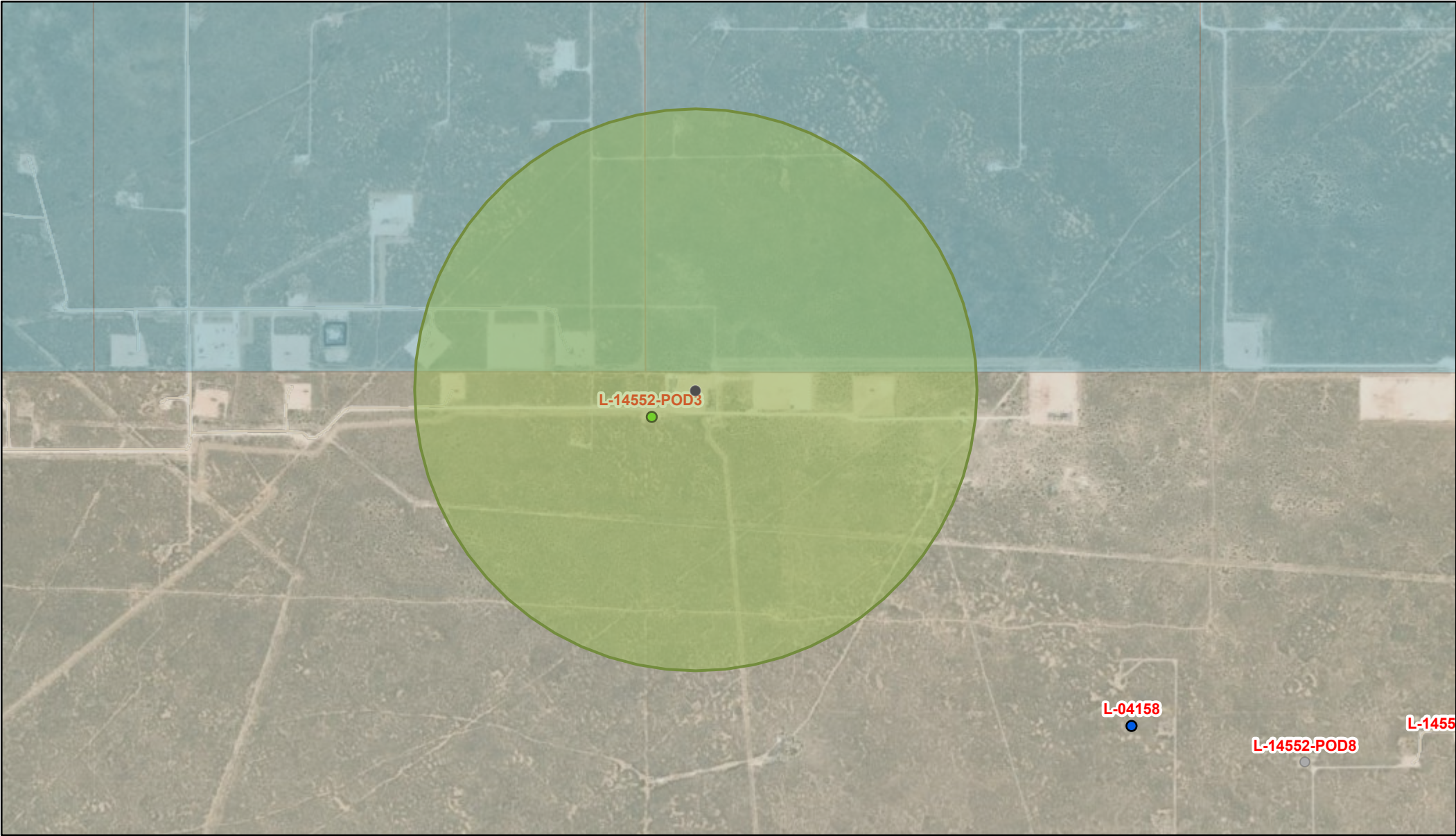
Oil, Cancelled

Low



BLM, OCD, New Mexico Tech, Oil Conservation Division of the New Mexico Energy, Minerals and Natural Resources Department., Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS

OSE POD Location Map



7/30/2024, 11:49:26 AM

- Override 1

GIS WATERS PODs

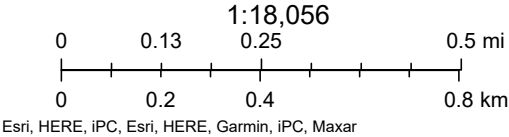
Active
- Pending

OSE District Boundary
- Water Right Regulations

Closure Area

Artesian Planning Area
- New Mexico State Trust Lands




Both Estates

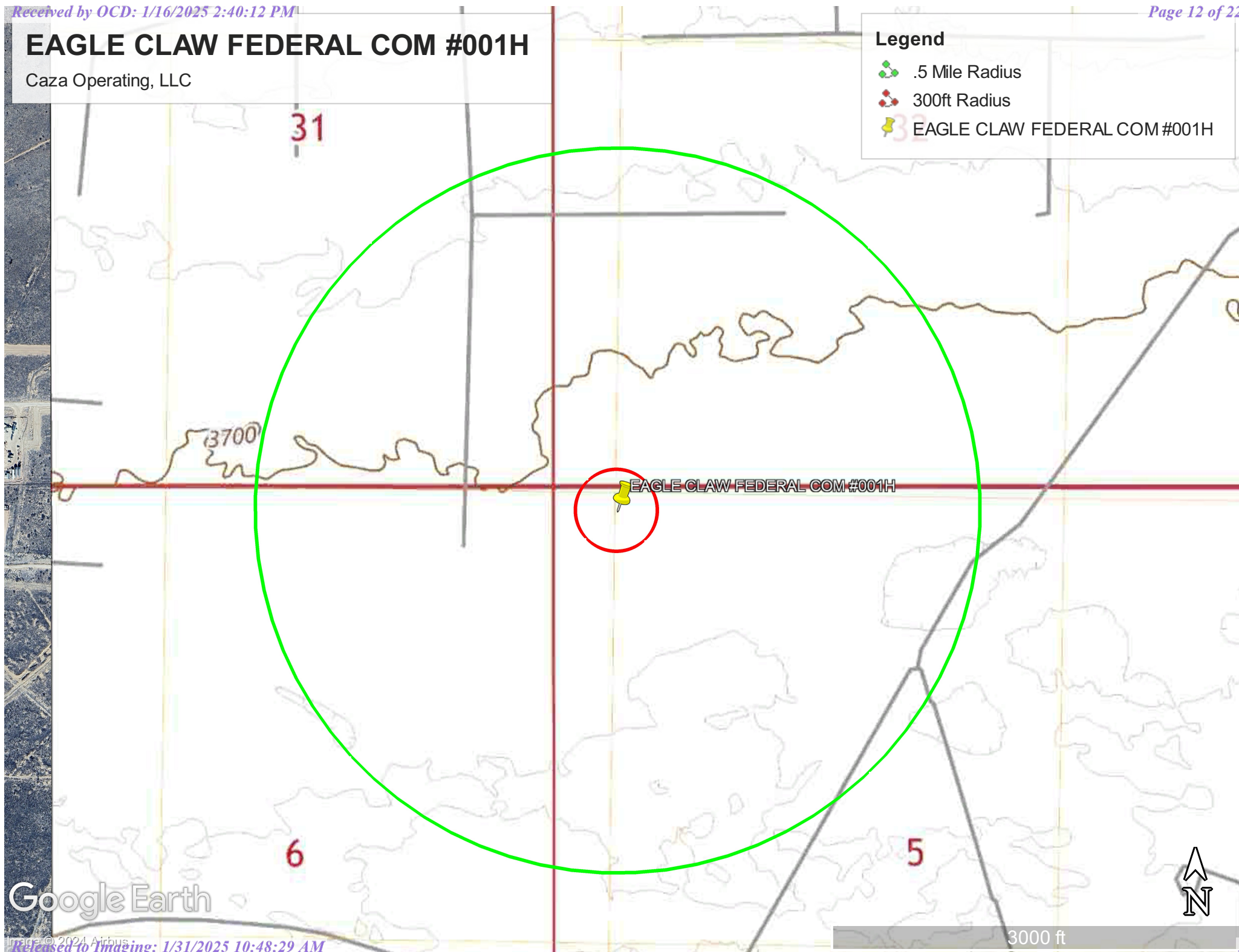


EAGLE CLAW FEDERAL COM #001H

Caza Operating, LLC

Legend

-  .5 Mile Radius
-  300ft Radius
-  EAGLE CLAW FEDERAL COM #001H



Google Earth



Wetlands



September 4, 2024

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond

- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

Photographic Log

PHOTOGRAPHIC LOG

Caza Operating, LLC.

Photograph No. 1

Facility: Eagle Claw Federal Com #001H

County: Lea County, New Mexico

Description:
View of Liner



Photograph No. 2

Facility: Eagle Claw Federal Com #001H

County: Lea County, New Mexico

Description:
View of Liner

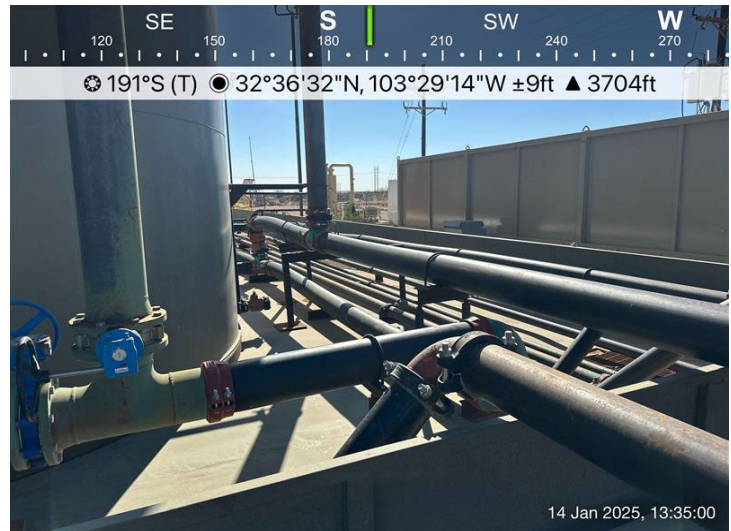


Photograph No. 3

Facility: Eagle Claw Federal Com #001H

County: Lea County, New Mexico

Description:
View of Liner



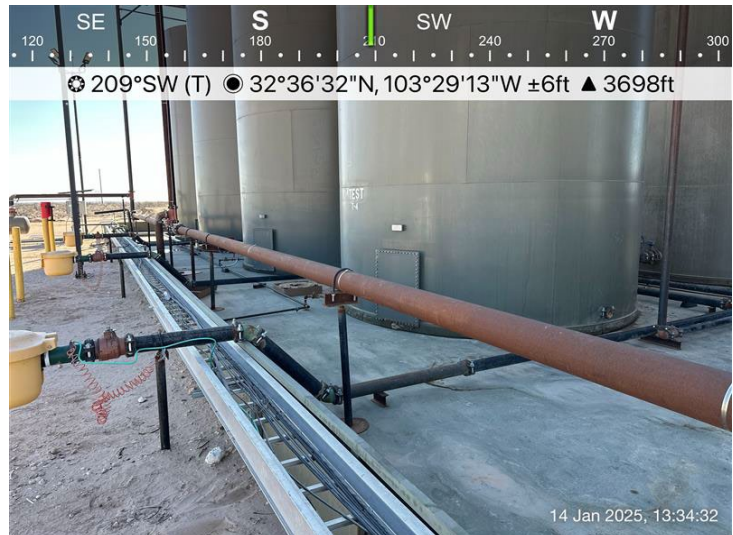
PHOTOGRAPHIC LOG

Caza Operating, LLC.

Photograph No. 4

Facility: Eagle Claw Federal Com #001H

County: Lea County, New Mexico

Description:
View of Liner

Photograph No. 5

Facility: Eagle Claw Federal Com #001H

County: Lea County, New Mexico

Description:
View of Liner

Photograph No. 6

Facility: Eagle Claw Federal Com #001H

County: Lea County, New Mexico

Description:
View of Liner

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 421768

QUESTIONS

Operator: CAZA OPERATING, LLC 200 N Loraine St Midland, TX 79701	OGRID: 249099
	Action Number: 421768
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nOY1809349107
Incident Name	NOY1809349107 EAGLE CLAW FEDERAL COM #001H @ 30-025-42988
Incident Type	Oil Release
Incident Status	Remediation Closure Report Received
Incident Well	[30-025-42988] EAGLE CLAW FEDERAL COM #001H

Location of Release Source

Please answer all the questions in this group.

Site Name	Eagle Claw Federal Com #001H
Date Release Discovered	03/20/2018
Surface Owner	Federal

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: Equipment Failure Treating Tower Crude Oil Released: 20 BBL Recovered: 19 BBL Lost: 1 BBL.
Produced Water Released (bbls) Details	Not answered.
Is the concentration of chloride in the produced water >10,000 mg/l	Not answered.
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, Page 2

Action 421768

QUESTIONS (continued)

Operator: CAZA OPERATING, LLC 200 N Loraine St Midland, TX 79701	OGRID: 249099
	Action Number: 421768
	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	No
Reasons why this would be considered a submission for a notification of a major release	Unavailable.
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	Not answered.

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: Kelly Arrendondo Title: Production Reporting Manager Email: karredondo@ntglobal.com Date: 01/16/2025
--	---

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QUESTIONS, Page 3

Action 421768

QUESTIONS (continued)

Operator: CAZA OPERATING, LLC 200 N Loraine St Midland, TX 79701	OGRID: 249099
	Action Number: 421768
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Site Characterization	
<i>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.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 26 and 50 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 1 and 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Between 1 and 5 (mi.)
A wetland	Between 1 and 5 (mi.)
A subsurface mine	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 1 and 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan	
<i>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.</i>	
Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	01/10/2025
On what date will (or did) the final sampling or liner inspection occur	01/14/2025
On what date will (or was) the remediation complete(d)	01/14/2025
What is the estimated surface area (in square feet) that will be remediated	17000
What is the estimated volume (in cubic yards) that will be remediated	0
<i>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.</i>	
<i>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.</i>	

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QUESTIONS, Page 4

Action 421768

QUESTIONS (continued)

Operator: CAZA OPERATING, LLC 200 N Loraine St Midland, TX 79701	OGRID: 249099
	Action Number: 421768
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)	
<i>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.</i>	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
<i>(Select all answers below that apply.)</i>	
Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	No
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
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: Kelly Arrendondo Title: Production Reporting Manager Email: karredondo@ntglobal.com Date: 01/16/2025
<i>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.</i>	

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QUESTIONS, Page 6

Action 421768

QUESTIONS (continued)

Operator: CAZA OPERATING, LLC 200 N Loraine St Midland, TX 79701	OGRID: 249099
	Action Number: 421768
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	419221
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	01/14/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	17000

Remediation Closure Request	
<i>Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.</i>	
Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	17000
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	n/a
<i>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>	
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: Kelly Arrendondo Title: Production Reporting Manager Email: karredondo@ntglobal.com Date: 01/16/2025

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CONDITIONS

Action 421768

CONDITIONS

Operator: CAZA OPERATING, LLC 200 N Loraine St Midland, TX 79701	OGRID: 249099
	Action Number: 421768
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	Liner inspection approved. Release closed.	1/31/2025