



March 31, 2025

New Mexico Oil Conservation Division

506 W. Texas Ave
Artesia, NM 88210

RE: **Black Marlin CTB - Closure Request Report**

Incident Number: nAPP2503639050

GPS: 32.136416°, -103.300244°

Lea County, New Mexico

Project No. 2838

To Whom It May Concern:

Earth Systems Response and Restoration (ESRR), presents the following Closure Request Report (CRR) to document the findings during a recent liner inspection conducted at the Black Marlin CTB (Site) following an inadvertent release of a hydrogen sulfide chemical within a lined secondary containment (LSC). Based on initial release response and liner inspection activities, Civitas Resources (Civitas) is requesting No Further Action (NFA) at the Site.

Site Location

The Site is located in Unit B, Section 18, Township 25 South, Range 36 East, in Lea County, New Mexico (32.136416°, -103.300244°) and is associated with oil and gas exploration and production operations on Private Land (**Figure 1**).

Incident Description & Background

On February 4, 2025, a faulty drain valve on an H₂S scavenger tote failed, releasing approximately 2,800 gallons of a hydrogen sulfide chemical within a LSC (**Figure 2**). The release was fully contained within the LSC with no fluids escaping to the production pad or adjacent native soils. A vacuum truck was immediately dispatched to the Site recovering the 2,800 gallons of fluids.

Immediate notice was given to the New Mexico Oil Conservation Division (NMOCD) on February 5, 2025, by Notification of Release (NOR) and subsequently assigned Incident Number nAPP2503639050. A Corrective Action Form C-141 (Form C-141) was submitted and accepted by the NMOCD on February 17, 2025.

On February 10, 2025, Civitas coordinated the LSC to be power washed, clearing all debris and residual fluids for an accurate inspection of the LSC. A 48-hour Notification of Liner Inspection (Form C-141 L) was submitted for February 13, 2025.

Due to miscommunication, the wrong containment was inspected on February 13, 2025. A subsequent liner inspection was scheduled, and a Form C-141 L was resubmitted for March 7, 2025.

Black Marlin CTB - Closure Request Report
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Site Characterization

ESRR characterized the Site according to Table I, Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29, Section 12 (19.15.29.12) of the New Mexico Administrative Code (NMAC). The following proximities were estimated:

- Between 1 and 5 miles of any continuously flowing watercourse or any other significant watercourse;
- Between ½ and 1 mile of any lakebed, sinkhole or playa lake (measured from the ordinary high-water mark);
- Greater than 5 miles of any occupied permanent residence, school, hospital, institution or church;
- Between 1 and 5 miles of any spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes;
- Between 1 and 5 miles of any other freshwater well or spring;
- Greater than 5 miles of any incorporated municipal boundary or a defined municipal fresh water well field covered under a municipal ordinance;
- Between 1,000 feet and 1/2 mile of any wetland;
- Greater than 5 miles of any subsurface mine;
- Greater than 5 miles of any unstable area (i.e. high karst potential); and
- Greater than 5 miles of a 100-year floodplain.

Receptor details used to determine the Site characterization are included in **Figure 3** and **Figure 4**. **Referenced Well Records** for the closest depth to water well are attached.

Based on the results from the desktop review and no depth to water well within 0.5 miles of the Site with data no greater than 25 years old, the following Closure Criteria was applied:

Constituents of Concern (COCs)	Closure Criteria [‡]
Chloride	600 milligram per kilogram (mg/kg)
Total Petroleum Hydrocarbon (TPH)	100 mg/kg
Benzene	10 mg/kg
Benzene, Toluene, Ethylbenzene, Total Xylenes (BTEX)	50 mg/kg

[‡]The reclamation concentration requirements of 600 mg/kg Chloride and 100 mg/kg TPH apply to the top 4 feet of areas to be immediately reclaimed following remediation pursuant to NMAC 19.15.17.13.

TPH= Gasoline Range Organics + Diesel Range Organics + Oil Range Organics

Laboratory Analytical Methods used: Environmental Protection Agency (EPA) 300.0, EPA 8015 NM, EPA 8021 B

Liner Inspection

On March 7, 2025, ESRR conducted a thorough visual inspection of the LSC and found no tears, cracks, cuts, breaks, or other signs of damage, confirming no evidence of a breach to the LSC. The liner appears to be in good condition and is performing as designed. **Photographic Documentation** of liner inspection activities is attached.

Closure Request

Based on initial release response and liner inspection activities, Civitas believes the completed remedial actions meet the requirements set forth in NMAC 19.15.29.13 regulations in order to be protective of human health, the environment, and groundwater. Civitas believes NFA is warranted at the Site and respectfully requests Closure for Incident Number nAPP2503639050.

Black Marlin CTB - Closure Request Report
Incident Number: nAPP2503639050
Lea County, New Mexico
Project No. 2838



If you have any questions or comments, please do not hesitate to contact Gilbert Moreno at (832) 541-7719 or gmoreno@earthsys.net. NMOCD Documentation of correspondence are attached.

Sincerely,

EARTH SYSTEMS RESPONSE & RESTORATION

A handwritten signature in black ink, appearing to read "Gilbert Moreno".

Gilbert Moreno
Carlsbad Operations Manager-Project Geologist

cc: Luke Kelly, Civitas Resources
Mason Jones, Civitas Resources

Attachments:

- Figure 1 - Site Map
- Figure 2 - Release Extent
- Figure 3 - Ground Water
- Figure 4 - Karst Potential
- Referenced Well Records
- Photographic Documentation
- NMOCD Documentation & Correspondence

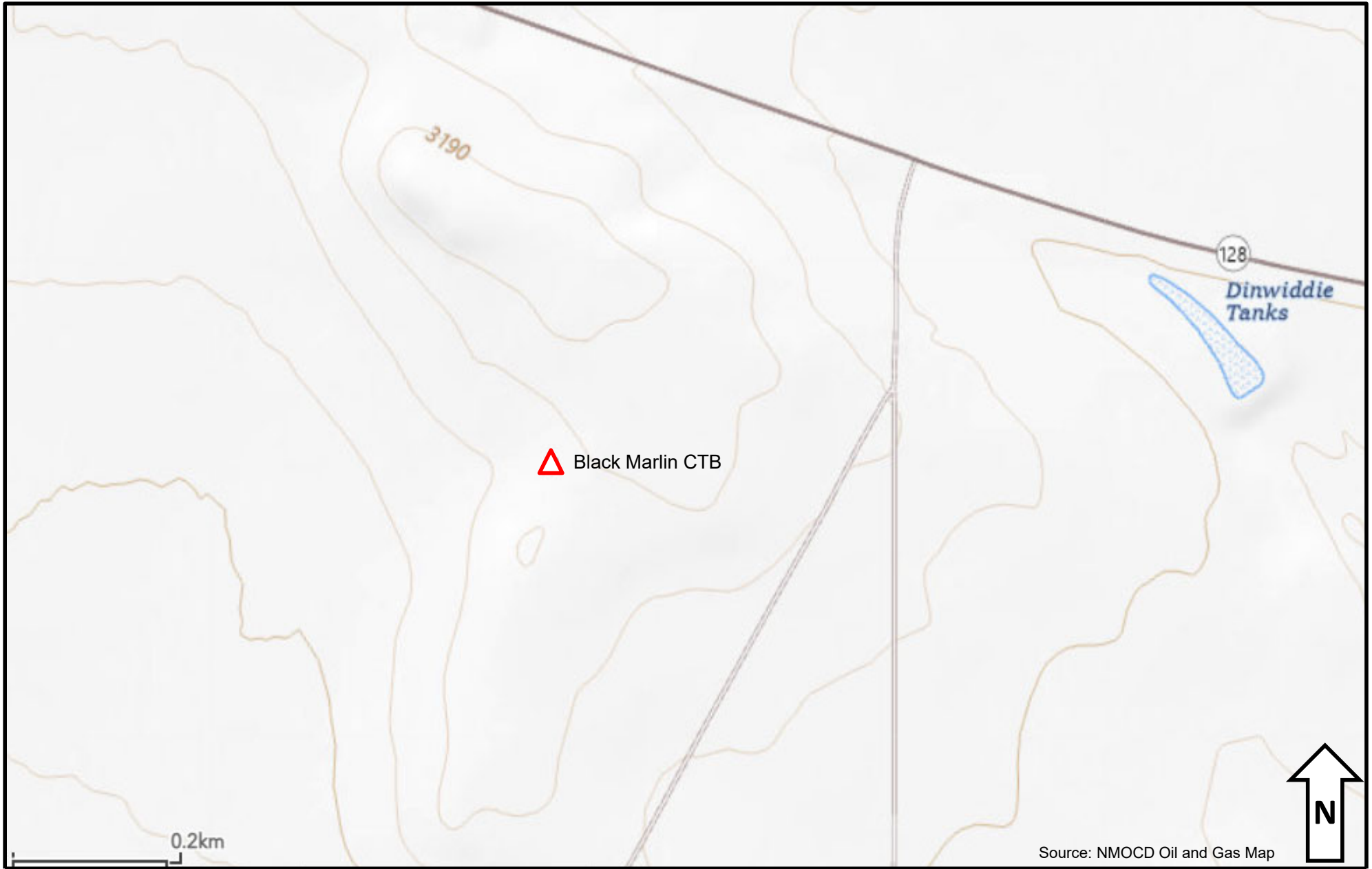


Figure 1 – Site Map

Civitas Resources – Black Marlin CTB
GPS: 32.136416°, -103.300244°
Lea County, New Mexico



Figure 2 – Release Extent

Civitas Resources – Black Marlin CTB
GPS: 32.136416°, -103.300244°
Lea County, New Mexico

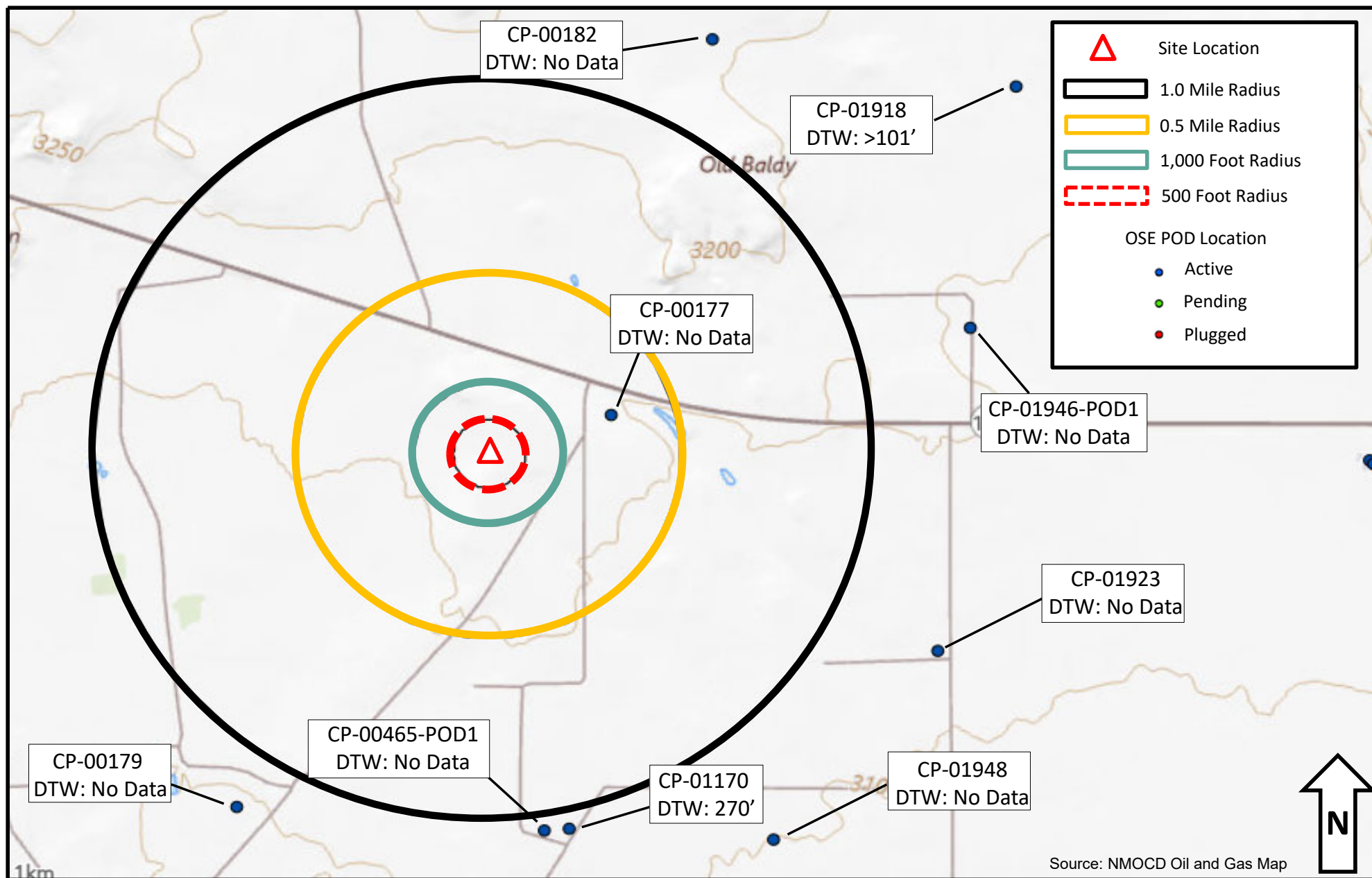


Figure 3 – Ground Water

Civitas Resources – Black Marlin CTB
 GPS: 32.136416°, -103.300244°
 Lea County, New Mexico

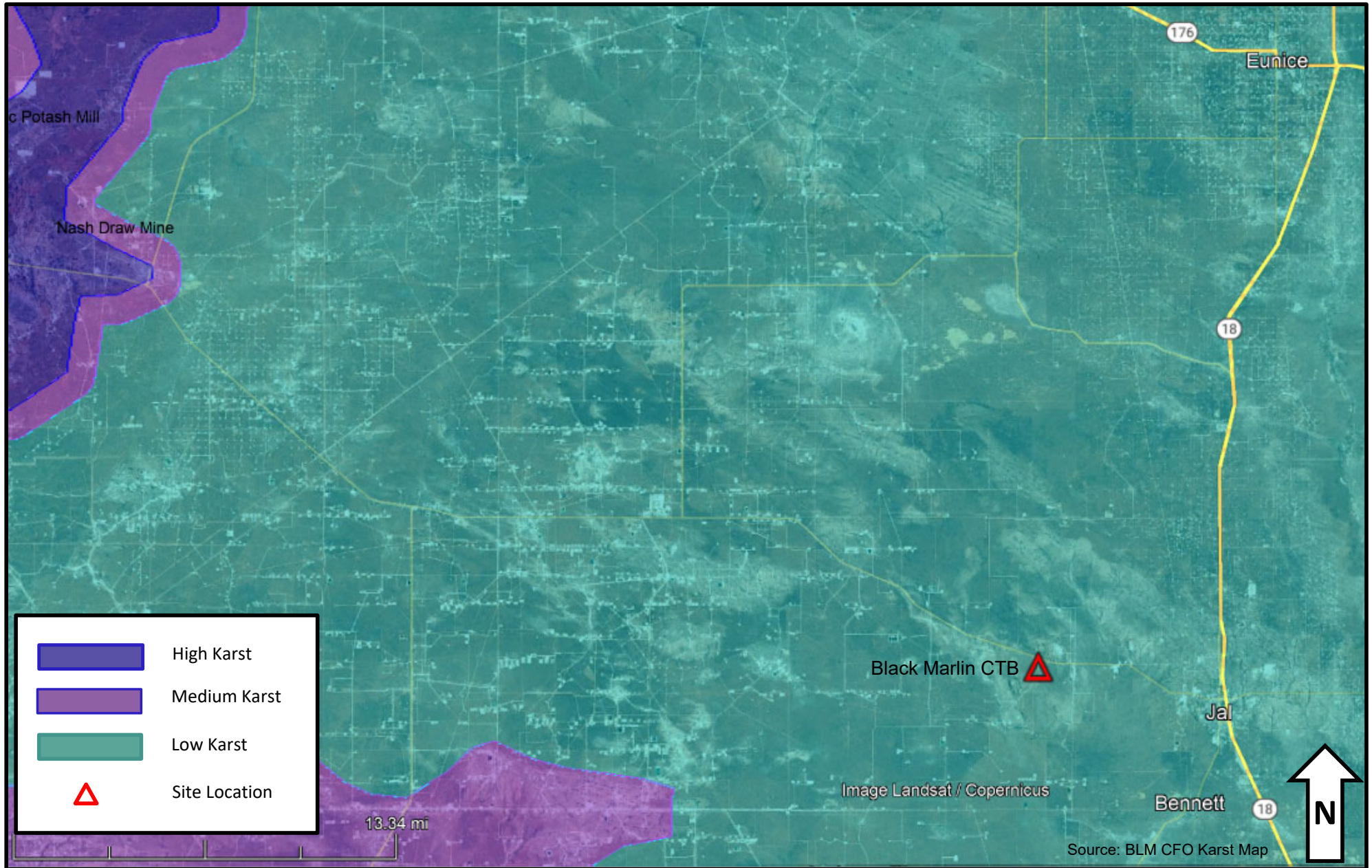


Figure 4 – Karst Potential

Civitas Resources – Black Marlin CTB
GPS: 32.136416°, -103.300244°
Lea County, New Mexico



WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

www.ose.state.nm.us

1. GENERAL AND WELL LOCATION	OSE POD NUMBER (WELL NUMBER) 5				OSE FILE NUMBER(S) CP-1170				
	WELL OWNER NAME(S) Beckham Ranch Inc.				PHONE (OPTIONAL) 706-5659				
	WELL OWNER MAILING ADDRESS 3904 Jesse James Ct				CITY Carlsbad		STATE NM		
					ZIP 88220				
	WELL LOCATION (FROM GPS)	DEGREES		MINUTES		SECONDS		* ACCURACY REQUIRED: ONE TENTH OF A SECOND * DATUM REQUIRED: WGS 84	
		LATITUDE	32	07	16	N	LONGITUDE		103
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS - PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE SE1/4, NE1/4, NE1/4, SECTION19, TOWNSHIP25S, RANGE36E									
2. DRILLING & CASING INFORMATION	LICENSE NUMBER WD-1607		NAME OF LICENSED DRILLER LUIS A. (TONY) DURAN				NAME OF WELL DRILLING COMPANY DURAN DRILLING		
	DRILLING STARTED 10-28-14		DRILLING ENDED 11-04-14		DEPTH OF COMPLETED WELL (FT) 506		BORE HOLE DEPTH (FT) 505		
					DEPTH WATER FIRST ENCOUNTERED (FT) 270				
	COMPLETED WELL IS:		<input type="radio"/> ARTESIAN		<input type="radio"/> DRY HOLE		<input checked="" type="radio"/> SHALLOW (UNCONFINED)		
	DRILLING FLUID:		<input type="radio"/> AIR		<input type="radio"/> MUD		ADDITIVES - SPECIFY: DRILLING MUD		
	DRILLING METHOD:		<input checked="" type="radio"/> ROTARY		<input type="radio"/> HAMMER		<input type="radio"/> CABLE TOOL		
							OTHER - SPECIFY:		
	DEPTH (feet bgl)		BORE HOLE DIAM (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)	CASING CONNECTION TYPE	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)	SLOT SIZE (inches)	
	FROM	TO							
	0	200	12	STEEL	STEEL PERF	8	1/4	-	
200	505	12	STEEL PERF	STEEL	8	1/4	1/8		
3. ANNULAR MATERIAL	DEPTH (feet bgl)		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL	AMOUNT (cubic feet)	METHOD OF PLACEMENT			
	FROM	TO							
	0	20	12	20 BGS 80 LBS CEMENT		MIXER			
	20	505	12	32 YARDS 1/4 GRAVEL					

FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 06/08/2012)

FILE NUMBER

CP-1170

POD NUMBER

5

TRN NUMBER

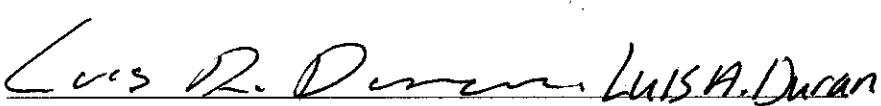
525599

255.36E.19.2.2.4

Commercial

4. HYDROGEOLOGIC LOG OF WELL	DEPTH (feet bgl)		THICKNESS (feet)	COLOR AND TYPE OF MATERIAL ENCOUNTERED - INCLUDE WATER-BEARING CAVITIES OR FRACTURE ZONES (attach supplemental sheets to fully describe all units)	WATER BEARING? (YES / NO)	ESTIMATED YIELD FOR WATER- BEARING ZONES (gpm)
	FROM	TO				
	0	1	1	TOP SOIL	<input type="radio"/> Y <input checked="" type="radio"/> N	
	1	2	1	CALICHE	<input type="radio"/> Y <input checked="" type="radio"/> N	
	2	36	34	CLAY & ROCK MIX	<input type="radio"/> Y <input checked="" type="radio"/> N	
	36	305	269	SAND	<input type="radio"/> Y <input checked="" type="radio"/> N	
	305	320	15	CLAY	<input type="radio"/> Y <input checked="" type="radio"/> N	
	320	335	15	ROCK & SAND MIX	<input checked="" type="radio"/> Y <input type="radio"/> N	17
	335	365	30	ROCK & CLAY	<input type="radio"/> Y <input checked="" type="radio"/> N	
	365	420	55	ROCK SAND MIX	<input checked="" type="radio"/> Y <input type="radio"/> N	8
	420	454	34	CLAY	<input type="radio"/> Y <input checked="" type="radio"/> N	
	454	463	9	SAND	<input checked="" type="radio"/> Y <input type="radio"/> N	10
	463	502	39	CLAY	<input type="radio"/> Y <input checked="" type="radio"/> N	
	502	505	3	RED BED	<input type="radio"/> Y <input checked="" type="radio"/> N	
					<input type="radio"/> Y <input type="radio"/> N	
					<input type="radio"/> Y <input type="radio"/> N	
					<input type="radio"/> Y <input type="radio"/> N	
					<input type="radio"/> Y <input type="radio"/> N	
					<input type="radio"/> Y <input type="radio"/> N	
					<input type="radio"/> Y <input type="radio"/> N	
					<input type="radio"/> Y <input type="radio"/> N	
					<input type="radio"/> Y <input type="radio"/> N	
					<input type="radio"/> Y <input type="radio"/> N	
METHOD USED TO ESTIMATE YIELD OF WATER-BEARING STRATA: <input type="radio"/> PUMP					TOTAL ESTIMATED	
<input type="radio"/> AIR LIFT <input checked="" type="radio"/> BAILER <input type="radio"/> OTHER - SPECIFY:					WELL YIELD (gpm): 35	

5. TEST; RIG SUPERVISION	WELL TEST	TEST RESULTS - ATTACH A COPY OF DATA COLLECTED DURING WELL TESTING, INCLUDING DISCHARGE METHOD, START TIME, END TIME, AND A TABLE SHOWING DISCHARGE AND DRAWDOWN OVER THE TESTING PERIOD.
		MISCELLANEOUS INFORMATION:
	PRINT NAME(S) OF DRILL RIG SUPERVISOR(S) THAT PROVIDED ONSITE SUPERVISION OF WELL CONSTRUCTION OTHER THAN LICENSEE: LUIS A. (TONY) DURAN	

6. SIGNATURE	THE UNDERSIGNED HEREBY CERTIFIES THAT, TO THE BEST OF HIS OR HER KNOWLEDGE AND BELIEF, THE FOREGOING IS A TRUE AND CORRECT RECORD OF THE ABOVE DESCRIBED HOLE AND THAT HE OR SHE WILL FILE THIS WELL RECORD WITH THE STATE ENGINEER AND THE PERMIT HOLDER WITHIN 20 DAYS AFTER COMPLETION OF WELL DRILLING:	
	 SIGNATURE OF DRILLER / PRINT SIGNEE NAME	11/04/14 DATE

FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 06/08/2012)

FILE NUMBER

CP-1170

POD NUMBER

5

TRN NUMBER

525599

25S.36E.19.22.4



WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

www.ose.state.nm.us

1. GENERAL AND WELL LOCATION	OSE POD NO. (WELL NO.) POD-1		WELL TAG ID NO. n/a		OSE FILE NO(S). CP-1918			
	WELL OWNER NAME(S) Ameredev Operating, LLC				PHONE (OPTIONAL) 737-300-4700			
	WELL OWNER MAILING ADDRESS 2901 Via Fortuna Suite 600				CITY Austin	STATE TX	ZIP 78746	
	WELL LOCATION (FROM GPS)	DEGREES 32	MINUTES 9	SECONDS 3.94	N	* ACCURACY REQUIRED: ONE TENTH OF A SECOND		
		LONGITUDE 103	16	35.73	W	* DATUM REQUIRED: WGS 84		
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS – PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE NW NW NW Sec.9 T25S R36S NMPM								
2. DRILLING & CASING INFORMATION	LICENSE NO. 1249		NAME OF LICENSED DRILLER Jackie D. Atkins			NAME OF WELL DRILLING COMPANY Atkins Engineering Associates, Inc.		
	DRILLING STARTED 9/19/2022	DRILLING ENDED 9/19/2022	DEPTH OF COMPLETED WELL (FT) temporary well material		BORE HOLE DEPTH (FT) ±101	DEPTH WATER FIRST ENCOUNTERED (FT) n/a		
	COMPLETED WELL IS: <input type="checkbox"/> ARTESIAN <input checked="" type="checkbox"/> DRY HOLE <input type="checkbox"/> SHALLOW (UNCONFINED)				STATIC WATER LEVEL IN COMPLETED WELL (FT) n/a	DATE STATIC MEASURED 9/26/2022		
	DRILLING FLUID: <input type="checkbox"/> AIR <input type="checkbox"/> MUD ADDITIVES – SPECIFY:							
	DRILLING METHOD: <input type="checkbox"/> ROTARY <input type="checkbox"/> HAMMER <input type="checkbox"/> CABLE TOOL <input checked="" type="checkbox"/> OTHER – SPECIFY: Hollow Stem Auger					CHECK HERE IF PITLESS ADAPTER IS INSTALLED <input type="checkbox"/>		
	DEPTH (feet bgl)		BORE HOLE DIAM. (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)	CASING CONNECTION TYPE (add coupling diameter)	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)	SLOT SIZE (inches)
	FROM	TO						
	0	101	±6.25"	Boring-HSA	--	--	--	--
3. ANNULAR MATERIAL	DEPTH (feet bgl)		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL	AMOUNT (cubic feet)	METHOD OF PLACEMENT		
	FROM	TO						


FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 01/28/2022)

FILE NO. CP-1918	POD NO. 1	TRN NO. 733734
LOCATION 25S. 36E. 09 111	WELL TAG ID NO.	PAGE 1 OF 2

4. HYDROGEOLOGIC LOG OF WELL	DEPTH (feet bgl)		THICKNESS (feet)	COLOR AND TYPE OF MATERIAL ENCOUNTERED - INCLUDE WATER-BEARING CAVITIES OR FRACTURE ZONES (attach supplemental sheets to fully describe all units)	WATER BEARING? (YES / NO)	ESTIMATED YIELD FOR WATER- BEARING ZONES (gpm)
	FROM	TO				
	0	9	9	Caliche and fine-grained sand, Brown	Y ✓ N	
	9	90	81	Sand, fine-grained, poorly graded, with caliche, Pinkish Tan	Y ✓ N	
	90	100	10	Sand, fine-grained, poorly graded, Brown	Y ✓ N	
	100	101	1	Sand, fine-grained, poorly graded, Reddish Brown	Y ✓ N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
METHOD USED TO ESTIMATE YIELD OF WATER-BEARING STRATA: <input type="checkbox"/> PUMP <input type="checkbox"/> AIR LIFT <input type="checkbox"/> BAILER <input type="checkbox"/> OTHER - SPECIFY:					TOTAL ESTIMATED WELL YIELD (gpm): 0.00	

5. TEST; RIG SUPERVISION	WELL TEST	TEST RESULTS - ATTACH A COPY OF DATA COLLECTED DURING WELL TESTING, INCLUDING DISCHARGE METHOD, START TIME, END TIME, AND A TABLE SHOWING DISCHARGE AND DRAWDOWN OVER THE TESTING PERIOD.
	MISCELLANEOUS INFORMATION: Temporary well material removed and soil boring backfilled using drill cuttings from total depth to ten feet below ground surface(bgs), then hydrated bentonite chips ten feet bgs to surface. DTW-04 <div style="text-align: right;">OSE 011 SEP 30 2022 PM 1:28</div>	
	PRINT NAME(S) OF DRILL RIG SUPERVISOR(S) THAT PROVIDED ONSITE SUPERVISION OF WELL CONSTRUCTION OTHER THAN LICENSEE: Shane Eldridge, Cameron Pruitt	

6. SIGNATURE	THE UNDERSIGNED HEREBY CERTIFIES THAT, TO THE BEST OF HIS OR HER KNOWLEDGE AND BELIEF, THE FOREGOING IS A TRUE AND CORRECT RECORD OF THE ABOVE DESCRIBED HOLE AND THAT HE OR SHE WILL FILE THIS WELL RECORD WITH THE STATE ENGINEER AND THE PERMIT HOLDER WITHIN 30 DAYS AFTER COMPLETION OF WELL DRILLING:	
	 Jackie D. Atkins _____ SIGNATURE OF DRILLER / PRINT SIGNEE NAME	9/29/2022 _____ DATE

FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 01/28/2022)

FILE NO. CP-1918	POD NO. 1	TRN NO. 733734
LOCATION 255.36E. 09 111	WELL TAG ID NO.	PAGE 2 OF 2

Mike A. Hamman, P.E.
State Engineer



Roswell Office
1900 WEST SECOND STREET
ROSWELL, NM 88201

STATE OF NEW MEXICO
OFFICE OF THE STATE ENGINEER

Trn Nbr: 733734
File Nbr: CP 01918
Well File Nbr: CP 01918 POD1

Oct. 04, 2022

ANDREW PARKER
AMEREDEV OPERATING LLC
2901 VIA FORTUNA SUITE 600
AUSTIN, TX 78746

Greetings:

The above numbered permit was issued in your name on 09/12/2022.

The Well Record was received in this office on 09/30/2022, stating that it had been completed on 09/19/2022, and was a dry well. The well is to be plugged according to 19.27.4.30 NMAC.

Please note that another well can be drilled under this permit if the well is completed and the well log filed on or before 09/12/2023.

If you have any questions, please feel free to contact us.

Sincerely,

A handwritten signature in cursive script that reads "Vanessa Clements".

Vanessa Clements
(575) 622-6521

drywell

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Lea County, New Mexico
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PHOTO 1: Civitas provided image of release extent. 02/04/2025



PHOTO 2: Northeastern view during liner inspection activities. 03/07/2025

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PHOTO 3: Southeastern view during liner inspection activities. 03/07/2025



PHOTO 4: Southwestern view during liner inspection activities. 03/07/2025

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PHOTO 5: Southeastern view during liner inspection activities. 03/07/2025



PHOTO 6: Northwestern view during liner inspection activities. 03/07/2025

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PHOTO 7: Southeastern view during liner inspection activities. 03/07/2025



PHOTO 8: Northeastern view during liner inspection activities. 03/07/2025

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PHOTO 9: Southeastern view during liner inspection activities. 03/07/2025



PHOTO 10: Northeastern view during liner inspection activities. 03/07/2025

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PHOTO 11: Southwestern view during liner inspection activities. 03/07/2025

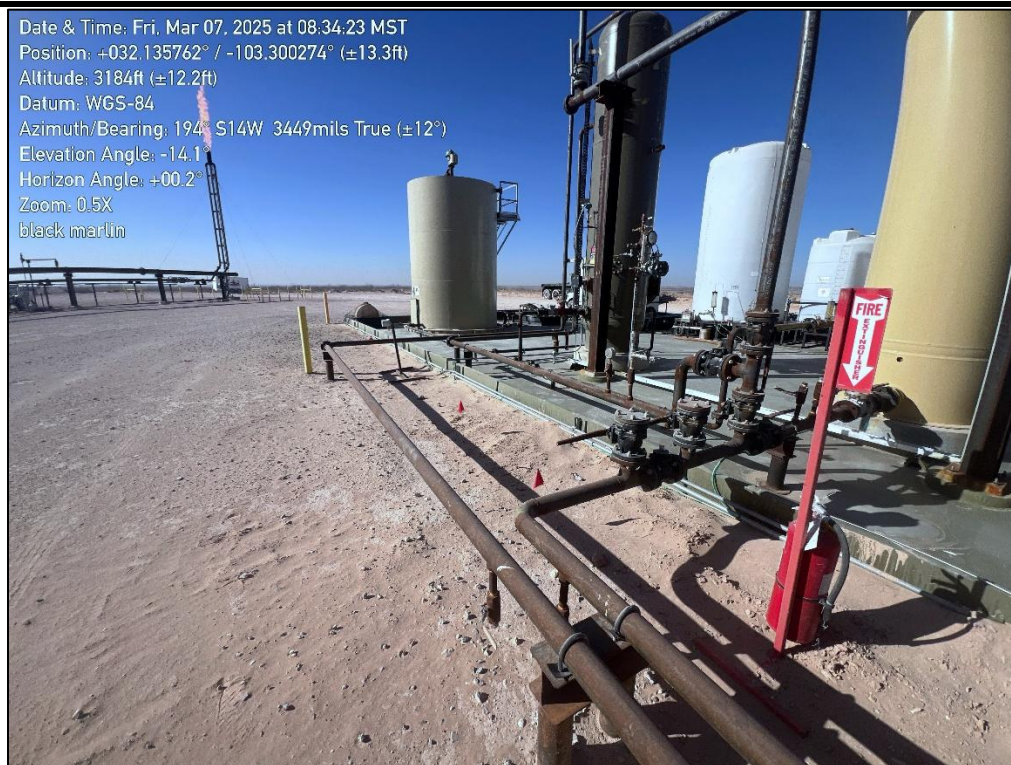


PHOTO 12: Southwestern view during liner inspection activities. 03/07/2025

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PHOTO 13: Northeastern view during liner inspection activities. 03/07/2025



PHOTO 14: Northeastern view during liner inspection activities. 03/07/2025



Outlook

Re: Liner Inspection Notification- Incident Number nAPP2503639050

From Gilbert Moreno <gmoreno@earthsys.net>**Date** Tue 3/4/2025 4:52 PM**To** ocd.enviro@emnrd.nm.gov <ocd.enviro@emnrd.nm.gov>**Cc** Kristopher Williams <kwilliams@earthsys.net>; Luke Kelly <lkelly@civiresources.com>; Mason Jones <mjones@civiresources.com>

Hello,

Earth Systems R & R will be conducting a subsequent liner inspection at the Black Marlin CTB on behalf of Civitas Resources on March 7th, 2025. The previous liner inspection performed on February 13th, 2025, was for the wrong containment on site due to miscommunication on ESRR's behalf. ESRR apologizes for any inconveniences this may have resulted in. This email will be followed up with a Notification of Liner Inspection (C-141L) for the new proposed date.

Site Name:	Black Marlin CTB
Incident Number(s):	nAPP2503639050
Surface Area of Liner:	2,212 sqft
Have impacted Materials been removed?:	Yes
Inspection Date:	3/7/2025
Proposed Time:	0800-1700 MST
Who to Contact:	Gilbert Moreno (832) 541-7719
Navigation to Site:	32.136416, -103.300244

Gilbert Moreno | Carlsbad Operations Manager- Project Geologist
1910 Resource Ct | Carlsbad NM, 88220
O. 575.323.9034 M. (832) 541-7719 | gmoreno@earthsys.net



From: Gilbert Moreno**Sent:** Monday, February 10, 2025 1:45 PM

To: ocd.enviro@emnrd.nm.gov <ocd.enviro@emnrd.nm.gov>

Cc: Kristopher Williams <kwilliams@earthsys.net>; Joel Lujan <jlujan@civiresources.com>; Luke Kelly <lkelly@civiresources.com>

Subject: Liner Inspection Notification- Incident Number nAPP2503639050

Hello,

Earth Systems R & R will be conducting a liner inspection at the Black Marlin CTB on behalf of Civitas Resources on February 13th, 2025. This email will be followed up with a Notification of Liner Inspection (C-141L) for the proposed date.

Site Name:	Black Marlin CTB
Incident Number(s):	nAPP2503639050
Surface Area of Liner:	9,726 sqft
Have impacted Materials been removed?:	Yes
Inspection Date:	2/13/2025
Proposed Time:	0800-1700 MST
Who to Contact:	Gilbert Moreno (832) 541-7719
Navigation to Site:	32.136416, -103.300244

Gilbert Moreno | Carlsbad Operations Manager- Project Geologist

1910 Resource Ct | Carlsbad NM, 88220

O. 575.323.9034 M. (832) 541-7719 | gmoreno@earthsys.net



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 439014

QUESTIONS

Operator: Civitas Permian Operating, LLC 555 17th Street Denver, CO 80202	OGRID: 332195
	Action Number: 439014
	Action Type: [NOTIFY] Notification Of Liner Inspection (C-141L)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2503639050
Incident Name	NAPP2503639050 BLACK MARLIN CTB @ 0
Incident Type	Release Other
Incident Status	Initial C-141 Approved
Incident Facility	[fAPP2126030240] BLACK MARLIN CTB

Location of Release Source	
Site Name	Black Marlin CTB
Date Release Discovered	02/04/2025
Surface Owner	Private

Liner Inspection Event Information	
<i>Please answer all the questions in this group.</i>	
What is the liner inspection surface area in square feet	2,212
Have all the impacted materials been removed from the liner	Yes
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	03/07/2025
Time liner inspection will commence	08:00 AM
 Warning: Notification can not be less than two business days prior to conducting liner inspection. 	
Please provide any information necessary for observers to liner inspection	Please contact Gilbert Moreno (832) 541-7719
Please provide any information necessary for navigation to liner inspection site	32.136416, -103.300244

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

CONDITIONS

Action 439014

CONDITIONS

Operator: Civitas Permian Operating, LLC 555 17th Street Denver, CO 80202	OGRID: 332195
	Action Number: 439014
	Action Type: [NOTIFY] Notification Of Liner Inspection (C-141L)

CONDITIONS

Created By	Condition	Condition Date
lkelly	Failure to notify the OCD of liner inspections including any changes in date/time per the requirements of 19.15.29.11.A(5)(a)(ii) NMAC, may result in the inspection not being accepted.	3/20/2025

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

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

QUESTIONS

Action 447619

QUESTIONS

Operator: Civitas Permian Operating, LLC 555 17th Street Denver, CO 80202	OGRID: 332195
	Action Number: 447619
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2503639050
Incident Name	NAPP2503639050 BLACK MARLIN CTB @ 0
Incident Type	Release Other
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2126030240] BLACK MARLIN CTB

Location of Release Source	
Please answer all the questions in this group.	
Site Name	Black Marlin CTB
Date Release Discovered	02/04/2025
Surface Owner	Private

Incident Details	
Please answer all the questions in this group.	
Incident Type	Release Other
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	Not answered.
Produced Water Released (bbls) Details	Not answered.
Is the concentration of chloride in the produced water >10,000 mg/l	No
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Cause: Human Error Other (Specify) Other (Specify) Released: 2,800 GAL Recovered: 2,800 GAL Lost: 0 GAL.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	A faulty drain valve on an H2S Scavenger tote resulted in approximately 2,800 gallons of fluid being released inside lined containment. All of the fluid was recovered and put back into a new tote.

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QUESTIONS, Page 2

Action 447619

QUESTIONS (continued)

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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	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: Luke Kelly Title: Manager, Environmental Regulatory Compliance Email: lkelly@civiresources.com Date: 02/17/2025
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QUESTIONS, Page 3

Action 447619

QUESTIONS (continued)

Operator: Civitas Permian Operating, LLC 555 17th Street Denver, CO 80202	OGRID:
	332195
	Action Number:
	447619
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 100 and 500 (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 ½ and 1 (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	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	Greater than 5 (mi.)
A wetland	Between 1000 (ft.) and ½ (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	Greater than 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	03/07/2025
On what date will (or did) the final sampling or liner inspection occur	03/07/2025
On what date will (or was) the remediation complete(d)	03/07/2025
What is the estimated surface area (in square feet) that will be remediated	2212
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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Action 447619

QUESTIONS (continued)

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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	<i>Not answered.</i>
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	<i>Not answered.</i>
<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: Mason Jones Title: c-Environmental Specialist Email: mjones@civiresources.com Date: 04/01/2025
<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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Action 447619

QUESTIONS (continued)

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	Action Number: 447619
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	439014
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	03/07/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	2212

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	Yes
What was the total surface area (in square feet) remediated	2212
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	The release was contained laterally by the lined containment ant the liner was performing as designed.

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: Mason Jones Title: c-Environmental Specialist Email: mjones@civiresources.com Date: 04/01/2025
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CONDITIONS

Action 447619

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CONDITIONS

Created By	Condition	Condition Date
scwells	Liner report approved. Please note that for future releases at this site, under the Site Characterization portion of the C-141 application the minimum distances to the following should be updated: any other significant watercourse is located 1900 feet to the NE and any playa lake is located 2,510 ft to the east. A C-141L notification should be submitted at least two business days prior to liner inspection.	4/2/2025