

UNITED STATES DISTRICT COURT
 for the

AUG 27 2025

District of New Mexico

MITCHELL R. ELFERS
 CLERK OF COURT

United States of America

v.

German Ortiz-Santillano

Case No. **25-MJ-3439**

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 27th, 2025 in the county of Eddy in the
State and District of New Mexico, the defendant(s) violated:

Code Section

Title 18 U.S.C. § 2314
 Title 18 U.S.C. § 2

Offense Description

Transportation of Stolen Goods
 Aiding and Abetting

This criminal complaint is based on these facts:

See attached Probable Cause Statement

☒ Continued on the attached sheet.

**TRENT
 BOONE**

Digitally signed by
 TRENT BOONE
 Date: 2025.08.26
 15:44:04 -06'00'

Complainant's signature

 Trent Boone, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/27/2025

City and state: Roswell, NM



Judge's signature

 Barbara S. Evans, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

1. I am a Special Agent in the Bureau of Land Management (BLM), United States Department of Interior. I have been employed since June 2015. As such, I am a law enforcement officer of the United States within the meaning of 18 U.S.C. § 2507(7) and am empowered by law to conduct investigations and to make arrest for offenses enumerated in 18 U.S.C. § 2516.

2. My experience as a Special Agent includes, but is not limited to, conducting physical surveillance, interviewing witnesses, writing affidavits for and executing search warrants, working with undercover agents and informants, issuance of administrative and federal grand jury subpoenas, analysis of phone toll and financial records, I have become familiar with the manner in which crude oil theft operations are structured, to include how the crude oil is stolen, transported, and sold.

3. I have personally participated in the investigation set forth below. I am familiar with the facts and circumstances of the investigation through my personal participation, from discussions with other agents of the FBI, and from my review of records and reports relating to the investigation. Unless otherwise noted, wherever in this affidavit I assert that a statement was made, the information was provided by another law enforcement officer or witness who may have had either direct or indirect knowledge of that statement and to whom I or others have spoken or whose reports I have read and reviewed. This affidavit does not include every fact known to me but only facts to establish probable cause.

4. On June 18th, 2025, an FBI Special Agent of the Midland, Texas Resident Agency Office was notified by a confidential source of information (CS) that Maxwell Jensen was seeking to orchestrate a scheme in which he would pay off employees of oil production companies for crude oil. The CS explained to FBI that Jensen would be storing the stolen crude oil at 4154 7 Rivers Highway, Carlsbad, New Mexico (Target Location), and that Jensen was seeking a vacuum truck

driver to pick up oil from third party locations, and the Target Location was used to receive approximately 600 barrels of oil every day. At current crude oil prices 600 barrels is valued at \$39,000.

5. After FBI informed me of the scheme, I started doing periodic surveillance of the Target Location. The location has three 500-barrel frac tanks and a white water hauling vacuum truck (Target Vehicle) that was frequently parked there. In my experience, I know that crude oil thieves utilize frac tanks to store stolen crude oil and vacuum trucks to steal millions of dollars' worth of crude oil from a variety of locations, including oil pipelines. The Target Vehicle's US DOT number is 3183291, and it bears the company name M.I.S. LLC in red lettering on its side.

6. On July 22, 2025, I observed the Target Vehicle leaving the location. I followed from a distance as it went out into the oilfield. I observed the Target Vehicle drive up to a Plains All American Pipeline site, located at coordinates 32.62494, -104.10080, a site in New Mexico, and hook up to a portion of the pipeline at the site. I left the area and returned later to photograph the scene. While I was leaving the area after taking photos, I observed that the Target Vehicle had already traveled to another Plains All American Pipeline site, located at coordinates 32.65158, -104.10264, another site in New Mexico, on the same pipeline. A Plains All American company truck was there assisting the Target Vehicle driver, suggesting that a Plains All American employee may be complicit in the scheme to steal the crude oil out of the pipeline.

7. On July 29, 2025, I submitted a tracker warrant for the Target Vehicle suspected of stealing and transporting stolen crude oil, and it was signed by a federal magistrate judge the following day.

8. On July 30, 2025, I coordinated a multi-agency operation, and we observed the suspects stealing crude oil. During the operation, Agents obtained video of the Target Vehicle connected to

the pipeline. Agents again observed the white Plains All American company truck present while the theft was occurring. The driver of the Plains All American company truck was assisting suspects in the Target Vehicle.

9. A review of the tracker data revealed that the Target Vehicle made 15 trips to Plains All American Pipeline sites from July 31, 2025, to August 11, 2025. On August 11, 2025, the tracker appeared to fall off the Target Vehicle. The tracker was located and placed back on the Target Vehicle on August 14, 2025.

10. On August 13, 2025, I went to one of the locations where the vacuum truck made multiple trips to Plains All American Pipeline sites to place a game camera to identify the Plains All American Truck working with the suspects. A picture of the Plains All American company truck was captured with the game camera driving away from the Plains all American facility.

11. The tracker data revealed that from August 15, 2025, to August 18, 2025, the Target Vehicle made four trips to Plains All American Pipeline sites. A total of 23 trips were recorded on the tracking device going to the Plains All American pipeline sites from July 22, 2025, to August 18, 2025. In my experience, I believe each of these trips involved the theft of crude oil.

12. On August 26, 2025, I observed a Plains All American truck parked at a gas station on North Canal Street in Carlsbad, NM. This was the same Plains All American truck that had been present at all the observed thefts. Using a picture I had captured following one of the thefts, I was able to identify it as the same white Chevy 2500 truck by the last four digits of the Texas license plate 8680. The truck was the same make, model, and color. It also had a red Zia symbol located on the top right side of the back window. The black toolbox in the bed of the truck was identical, and the fire extinguisher in the bed was in the same location.

13. I followed the truck north from the gas station on North Canal Street out of Carlsbad, NM. The truck then turned onto Illinois Camp Road and continued north into the area where all the crude oil thefts had occurred. I noticed that the trailer the truck was pulling did not have a license plate. I contacted an ECSO detective sergeant, and a traffic stop was conducted. After the detective finished issuing a written warning to the driver, identified as German Ortiz-Santillano, I approached him. I asked Ortiz-Santillano if he would be willing to step out and speak with me, and he agreed.

14. I asked Ortiz-Santillano how long he had been driving the truck, and he said, "I guess say about a year." I then asked how long he had worked for Plains, and he stated, "Two years." When I asked what area he worked in for Plains, he said from Carlsbad over to Highway 360—the area where all the thefts occurred. I asked him what his job was exactly, and he said, "Uh, my job is pigging, help the other operators, uh, is pigging is help the other operators, uh, same thing, pig or go change valves and install installation kits, go to the LACT units, change valves." The pigging stations are the points on the pipeline where all of the thefts occurred. I asked Ortiz-Santillano if anyone else ever drove his company truck, and he said he was the only one who drove it and took the vehicle home every night.

15. Based on the facts set forth in this affidavit, your affiant has probable cause to believe that German Ortiz-Santillano has committed violations of Title 18 U.S.C. § 2314, and 18 U.S.C. § 2, aiding and abetting.

Respectfully Submitted,

TRENT BOONE Digitally signed by TRENT BOONE
Date: 2025.08.26 15:36:57 -06'00'

Trent Boone
BLM Special Agent

Subscribed and sworn to before me this
27th day of August, 2025.



Barbara S. Evans
United States Magistrate Judge