Received by OCD: 10/31/2019 10:09:29 AM Received by OCD: 1/27/2021 1:35:07 PM

> 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

State of New Mexico Energy Minerals and Natural Resources Department

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Page 1 of 17

Form C-141 Revised August 24, 2018 Submit to appropriate OCD District office

Incident ID	NRM1935354566
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

TJK88-191031-C-1410

Responsible Party XTO Energy	OGRID 5380	
Contact Name Kyle Littrell	Contact Telephone 432-221-7331	
Contact email Kyle_Littrell@xtoenergy.com	Incident # (assigned by OCD)	
Contact mailing address 522 W. Mermod, Carlsbad, NM 88220		

Location of Release Source

Latitude 32.211013

NAD 83 in decimal degrees to 5 decimal places)

Site Name PLU 15 Twin Wells Ranch 905H	Site Type Well Location
Date Release Discovered 10/16/2019	API# (if applicable) 30-015-45061 (PLU 15 – Twins Wells Ranch #905H)

Unit Letter	Section	Township	Range	County
N	15	248	31E	EDDY

Surface Owner: State Federal Tribal Private (Name:

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)			
Crude Oil	Volume Released (bbls) 0	Volume Recovered (bbls) 0	
Produced Water	Volume Released (bbls) 0	Volume Recovered (bbls) 0	
	Is the concentration of dissolved chloride in the	Yes No	
	produced water >10,000 mg/l?		
Condensate	Volume Released (bbls)	Volume Recovered (bbls)	
🔲 Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)	
Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)	
50/50 blend FRAC fluid	70 bbls	50 bbls	

Cause of Release: Contract trainee employee allowed hydration unit tank to overflow to pad surface. Additional third party resources have been retained to assist in the remediation.

Form C-141

Oil Conservation Division

Incident ID	NRM1935354566
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Was this a major	If YES, for what reason(s) does the responsible party consider this a major release?	
release as defined by		
10.15.20.7(A) NIM (AC2	VES An unputherized release of fluid over 25 herrole	
19.15.29.7(A) NMAC?	r ES – An unautionized release of fluid over 25 barrels	
\bowtie Yes \square No		
If XES was immediate notice given to the OCD? By whom? To whom? When and by what means (nhone, email, etc)?		
YES, by Amy Ruth : to Rob Hamlet; Victoria Venegas; "Griswold, Jim, EMNRD"; <u>blm_nm_cfo_spill@blm.gov</u> on 10-17-19 at		

8:38am.

Initial Response

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

 \square The source of the release has been stopped.

The impacted area has been secured to protect human health and the environment.

Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.

All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not been undertaken, explain why:

N/A

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

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: Kyle Littrell	Title: <u>SH&E Supervisor</u>
Signature Sutter	Date:10/31/2019
email: _Kyle Littrell@xtoenergy.com	Telephone:
OCD Only	
Received by: <u>Ramona Marcus</u>	Date: 12/19/2019

Oil Conservation Division

	Page 3 of .	17
Incident ID	NRM1935354566	
District RP		
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?	<u>>100</u> (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
- \square 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.

Received by OCD: 1/27/2021	1:35:07 PM			Page 4 of 12
ronn C-141			Incident ID	NRM1935354566
Page 4	Oil Conservation Division	Oil Conservation Division		
			Facility ID	
			Application ID	
regulations all operators are republic health or the environme failed to adequately investigate addition, OCD acceptance of a and/or regulations. Printed Name:	Action given above is true and complete to the quired to report and/or file certain release no ent. The acceptance of a C-141 report by the e and remediate contamination that pose a the a C-141 report does not relieve the operator of <u>Kyle Littrell</u>	te best of my knowledge a stifications and perform c c OCD does not relieve th areat to groundwater, surf of responsibility for comp 	Ind understand that purs orrective actions for rele e operator of liability shace water, human health liance with any other fea Supervisor	uant to OCD rules and eases which may endanger ould their operations have or the environment. In deral, state, or local laws
OCD Only Received by:		Date:		

Oil Conservation Division

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Incident ID	NRM1935354566
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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.
\times A scaled site and sampling diagram as described in 19.15.29.	11 NMAC
Photographs of the remediated site prior to backfill or photos must be notified 2 days prior to liner inspection)	of the liner integrity if applicable (Note: appropriate OCD District office
Laboratory analyses of final sampling (Note: appropriate OD	C District office must be notified 2 days prior to final sampling)
Description of remediation activities	
and regulations all operators are required to report and/or file certain may endanger public health or the environment. The acceptance of should their operations have failed to adequately investigate and rem human health or the environment. In addition, OCD acceptance of compliance with any other federal, state, or local laws and/or regular restore, reclaim, and re-vegetate the impacted surface area to the co- accordance with 19.15.29.13 NMAC including notification to the O	The responsible party acknowledges they must substantially modifies the existed prior to the release or their final land use in DCD when reclamation and re-vegetation are complete.
Printed Name: Kyle Littrell	Title: <u>SH&E Supervisor</u>
Signature:	Date:01/21/2021
email: <u>Kyle_Littrell@xtoenergy.com</u>	Telephone: <u>432-221-7331</u>
OCD Only	
Received by: Chad Hensley	Date: 03/25/2021
Closure approval by the OCD does not relieve the responsible party remediate contamination that poses a threat to groundwater, surface party of compliance with any other federal, state, or local laws and/	of liability should their operations have failed to adequately investigate and water, human health, or the environment nor does not relieve the responsible for regulations.
Closure Approved by:	Date:03/25/2021
Printed Name: Chad Hensley	Title: Environmental Specialist Advanced

Page 6

WSP USA

3300 North "A" Street Building 1, Unit 222 Midland, Texas 79705 432.704.5178

January 21, 2021

District II New Mexico Oil Conservation Division 811 South First Street Artesia, New Mexico 88210

RE: Closure Request Addendum PLU 15 Twin Wells Ranch 905H Incident Number NRM1935354566 Eddy County, New Mexico

To Whom it May Concern:

WSP USA Inc. (WSP) (formerly LT Environmental, Inc.), on behalf of XTO Energy, Inc. (XTO), presents the following addendum to a Closure Request submitted March 13, 2020. This Addendum provides an update to the depth to groundwater determination activities at the PLU Twin Wells Ranch 905H (Site), located in Unit N, Section 15, Township 24 South, Range 31 East, in Eddy County, New Mexico (Figure 1), in response to the denial of the Closure Request by the New Mexico Oil Conservation Division (NMOCD). In the denial, NMOCD expressed concern that the depth to groundwater assessment may not be sufficient. Based on the additional depth to groundwater determination activities described below, XTO is requesting no further action (NFA) for Incident Number NRM1935354566.

BACKGROUND

On March 13, 2020, WSP submitted a Closure Request to the NMOCD for the October 16, 2019 hydration unit tank overflow release of 70 barrels (bbls) of hydraulic fracturing fluid onto the caliche well pad. A vacuum truck was dispatched to the Site to recover freestanding fluid. Approximately 50 bbls of free-standing fluids were recovered. XTO reported the release to NMOCD on a Release Notification and Corrective Action Form C-141 (Form C-141) on October 31, 2019 and was subsequently issued Incident Number NRM1935354566.

The Closure Request detailed site characterization according to Table 1, 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). Based on the site characterization, the following Closure Criteria were applied:

- Benzene: 10 milligrams per kilogram (mg/kg)
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg
- Total petroleum hydrocarbons (TPH)-gasoline range organics (GRO) and TPH-diesel range organics (DRO): 1,000 mg/kg

wsp

District II Page 2

- TPH: 2,500 mg/kg
- Chloride: 20,000 mg/kg

Closure was requested based on laboratory analytical results for the delineation soil samples indicating that benzene, BTEX, TPH-GRO/TPH-DRO, TPH, and chloride concentrations were compliant with the Closure Criteria and no excavation was required.

On April 21, 2020, NMOCD denied the submitted Closure Request for Incident Number NRM1935354566 for the following reason:

• The depth to groundwater has been incorrectly assessed. When nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, and data should be no more than 25 years old, and well construction information should be provided. If XTO believes that groundwater is > 100', a borehole will need to be drilled onsite and a copy of the driller's log must be provided.

ADDITIONAL SITE ACTIVITIES

In an effort to confirm the depth to groundwater determination, WSP oversaw installation a soil boring at the Site utilizing a truck-mounted hollow-stem auger rig. The soil boring (BH01) was advanced to a depth of 110 feet bgs. A WSP geologist logged and described soils continuously. No moisture or groundwater was encountered during drilling activities. The borehole lithologic/soil sampling log is included in Attachment 1. The location of the borehole is approximately 275 feet north-northeast of the Site and is depicted on Figure 1. The borehole was left open for over 72 hours to allow for potential slow infill of groundwater. After the 72-hour waiting period without observing groundwater, it was confirmed that groundwater beneath the Site is greater than 110 feet bgs. The borehole was properly abandoned with drill cuttings and hydrated bentonite chips. Based on the confirmed depth to water greater than 110 feet bgs, the Table 1 Closure Criteria identified in the original Closure Request are applicable and appropriate for protection of groundwater at this Site.

CLOSURE REQUEST

Site assessment and delineation activities were completed at the Site to assess for the presence or absence of impacted soil resulting from the October 16, 2019 release of hydraulic fracturing fluid. Laboratory analytical results for the delineation soil samples indicated that benzene, BTEX, TPH-GRO/TPH-DRO, TPH, and chloride concentrations were compliant with the Closure Criteria and no further remediation was required.

Based on the confirmed depth to water greater than 110 feet bgs as presented in this addendum and laboratory analytical results below the Closure Criteria in the delineation soil samples, XTO respectfully requests no further action for Incident Number NRM1935354566.

wsp

District II Page 3

If you have any questions or comments, please do not hesitate to contact Ms. Ashley Ager at (970) 385-1096 or Ashely.Ager@wsp.com.

Sincerely,

WSP USA, INC.

pen 1_

Spencer Lo Assistant Geologist

Ashley L. ager

Ashley L. Ager, P.G. Managing Director, Geologist

cc: Kyle Littrell, XTO United States Bureau of Land Management – New Mexico

Attachments:

Figure 1Site Location MapAttachment 1Lithologic / Soil Sample Log

FIGUR

Released to Imaging: 3/25/2021 7:09:56 AM



Released to Imaging: 3/25/2021 7:09:56 AM

LITHOLOGIC / S Lat/Long: 32.211550,-103.765359 Comments: No field screnning: only lithol	WSP USA 508 West Stevens Street Carlsbad, New Mexico 88220 SOIL SAMPLING LOG Field Screening Chloride, PID NO FIELD SC	BH or PH BH01 Site Name RP or Inci LTE Job N Logged By CREENING 8.25"	Name: e: dent Number: lumber: / W.M./L.A.D. neter:	Date: 12/29/2020 PLU TWR 905H TE012919257 Method: Hollow Stem Auger, Air Rotary Total Depth: 111.8' bgs
Moisture Moisture Content Chloride (ppm) Yapor (ppm) Staining	Sample Depth (ft bgs)	0-14': SAND, i little clai light-bro dry. 5': Trace ca 14-15': SAND, f some ca light-bro dry. 15-25': CALICH silty, son off-white 24': Reduce 25': Color ch	Lithology/F	Remarks , poorly graded, ,25mm), stain, no odor, ly graded, n-9mm), stain, no odor nsolidated, (1mm-9mm) odor dry. m-5mm). colate brown.

WSP USA								BH or PH Name: BH01	Date:	
				5		Stevens 9	Street		Site Name	PLUTWR 905H
				Car	Isbad, Ne	w Mexico	88220		RP or Incident Number:	1 20 1 1 1 30311
									LTE Job Number:	TE012919257
LITHOLOGIC / SOIL SAMPLING LOG									Logged By W.M./L.A.D.	Method: Hollow Stem Auger, Air Rotary
Lat/Long: Field Screening									Hole Diameter:	Total Depth:
32.211550,-103.765359 Chloride, PID NO FIELD SCREENING									8.25"	111.8' bgs
Comm	ients: No fi	iela scren	ning: o	niy lithologic	analysis a	na remarks	5.			
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	45.05%	Lithology/F	Remarks
					1	20	ML-S	15-25 :	silty some caliche gravel	(1mm-9mm)
					-	27	IVIL-0		off-white-tan, no stain, no	odor, dry.
					-	28		24':	Reduced gravel size (1m	m-5mm).
					-	29		25':	Color change to milk choo	colate brown.
					-	30		26-46':	SILTSTONE, moderately	consolidated,
					-	31			red-brown, no stain, no oc	dor, dry.
					-	32		39':	Few sand, gravel absent.	
					-	33		46-64':	CLAYSTONE, moderately	/ consolidated,
					-	34			red-brown, no stain, no oc	dor, dry.
					-	35		48':	Resistance increaed, high	nly consolidated.
					-	36				
					-	37				
					-	38				
					-	39				
					-	40				
					-	41				
					-	42				
					-	43				
					-	44				
					-	45				
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					-	48				
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					-	50				

unit regression Depuise Barmele Bergession Depuise Bergession Depuisesinsin an output	WSP USA 508 West Stevens Street Carlsbad, New Mexico 88220 LITHOLOGIC / SOIL SAMPLING LOG Lat/Long: 32.211550,-103.765359 Comments: No field screnning: only lithologic analysis and remarks.									BH or PH Name: BH01 Site Name: RP or Incident Number: LTE Job Number: Logged By W.M./L.A.D. Hole Diameter: 8.25"	Date: 12/29/2020 PLU TWR 905H TE012919257 Method: Hollow Stem Auger, Air Ro Total Depth: 111.8' bgs	otary
	Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Sample Depth (ft bgs)	Depth (ft bgs) 51 52 53 54 55 56 57 58 59 60 61 62 63 61 62 63 64 63 64 65 63 64 65 67 68 69 70 71 72 73 74 75	CL-S CL-S CL-S	46-64': 48': 54': 64-69': 69-72': 72-90: 72': 74-90':	Litholo CLAYSTONE, modera cohesive, medium pla red-brown, no stain, no Resistance increaed, Switched to air rotary. SANDSTONE, highly medium-grain, well gr brown, no stain, no oc CLAYSTONE and SA stringers, low confider (1ft.) due to pulverized rotary. SANDSTONE, highly medium-grain, well gr brown, no stain, no oc CLAYSTONE, highly cohesive, medium pla red-brown, no stain, no Faint yellow-tan sedin SANDSTONE stringe intermittently. Aprox. a	ately consolidated, isticity, few sand, o odor, dry. highly consolidated. consolidated, aded white-light- dor, dry, sharp trans. NDSTONE nce in stringer width d material from air consolidated, aded white-light- dor, dry. consolidated, isticity, few sand, io odor, dry. nent powder rs appear at 1 ft. intervals.	

				_	WS	PUSA			BH or PH Name: BH01	Date: 12/29/2020
	Carlsbad, New Mexico 88220							Site Name: RP or Incident Number:	PLU TWR 905H	
									LTE Job Number:	TE012919257
LITHOLOGIC / SOIL SAMPLING LOG								Logged By W.M./L.A.D.	Method: Hollow Stem Auger, Air Rotary	
Lat/Lo	ng:				Field Scre	ening NO	FIELD S	CREENING	Hole Diameter:	Total Depth:
32.211 Comm	1550,-103. ients: No f	765359 field screr	nina. c	only lithologi	Chloride,	PID nd remark	S.		8.25"	111.8' bgs
			g. c					-		
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol		Lithology	/Remarks
					- - - - - -	76 77 78 79		72-90: 74-90': 85' [.]	CLAYSTONE, highly co cohesive, medium plast red-brown, no stain, no SANDSTONE stringers intermittently. Aprox. at SANDSTONE is now pa	nsolidated, icity, few sand, odor, dry. appear 1 ft. intervals. ale vellow- off
					-	80			white color.	
					-	81		90-101':	SANDSTONE, highly co grain, few silt, color vari	onsolidated, fine es- predominately
					-	82			white/offwhite, no stain, Colors include: (Brown-	no odor, dry. red, yellow-white,
					-	83			white-off-white)	
					-	84				
					-	85				
					-	86				
					-	87				
					-	88				
					-	89				
					-	90	SP-S			
					-	91				
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					-	98				
					- -	99 <u>10</u> 0				

WISD LISA								BH or PH Name:	Date:			
					VV5	P USA			BH01	12/29/2020		
				5	08 West	Stevens S	Street		Site Name:	PLU TWR 905H		
				Car	Isbad, Ne	w Mexico	88220		RP or Incident Number:			
									LTE Job Number:	TE012919257		
LITHOLOGIC / SOIL SAMPLING LOG								Logged By W.M./L.A.D.	Method: Hollow Stem Auger, Air Rotary			
Lat/Long: Field Screening NO FIELD SCREENING								SCREENING	Hole Diameter:	Total Depth:		
Comm	nents: No f	field screr	nnina: c	only lithologia	chioride,	nd remark	s.		0.20			
				,								
Moisture Content	Chloride (ppm)	Vapor (ppm) (ppm) (ppm) (tst gample (tst gample (tst gample (tst gample (tst gample) (tst gample							Lithology/Remarks			
						101	SP-S	90-101':	SANDSTONE, highly cons	solidated, fine		
					- - -	102 103	CL-S		grain, few silt, color varies white/offwhite, no stain, no Colors include: (Brown-red white-off-white)	- predominately o odor, dry. d, yellow-white,		
					- - -	104		101-108':	CLAYSTONE, highly cons cohesive, medium-low pla sand, red-brown, no stain.	olidated, sticity, few , no odor ,dry.		
					-	106		101':	Trace gray gravel (4.4-9.4	mm)		
					-	107		103':	SANDSTONE stringer			
					-	108		108-111.8:	SANDSTONE, highly cons grain, few silt, color varies	solidated, fine - predominately		
						109			white/offwhite, no stain, no	o odor, dry.		
					-	110						
						112						
					-	113		TD = 111.8 Water not for	ft. bgs bund upon well setting on 1	2/29/2020		
					-	114		DT W Weas	urement on 1/5/20. N/a Dry	, 		
					-	115						
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					-	121						
					-	122						
					-	123 124						
					-	124						

CONDITIONS

Action 15862

District I 1625 N. French Dr., Hobbs, NM 88240 Phone:(575) 393-6161 Fax:(575) 393-0720 District II

811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

District III 1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

District IV 1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS OF APPROVAL

Operator:	OGRID:	Action Number:	Action Type:
XTO ENERGY, INC 6401 Holiday Hill Road	5380	15862	C-141
Building #5 Midland, TX79707			
OCD Reviewer	Condition		
chensley	None		