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

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

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party	OGRID
Contact Name	Contact Telephone
Contact email	Incident # *(assigned by OCD)*
Contact mailing address	

Location of Release Source

Latitude _____ Longitude _____
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Site Type
Date Release Discovered	API# *(if applicable)*

Unit Letter	Section	Township	Range	County

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)	Volume Recovered (bbls)
☐ Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of total dissolved solids (TDS) in the produced water >10,000 mg/l?	☐ Yes ☐ No
☐ 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)
Cause of Release		

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? ☐ Yes ☐ No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

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.
☐ 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:

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: _____ Title: _____

Signature: Adrian Bates Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

Location:	Ross Draw 25-31 Battery	
Spill Date:	3/15/2021	
Area 1		
Approximate Area =	123.52	cu.ft.
VOLUME OF LEAK		
Total Crude Oil =	22.00	bbls
TOTAL VOLUME OF LEAK		
Total Crude Oil =	**22.00**	**bbls**
TOTAL VOLUME RECOVERED		
Total Crude Oil =	**22.00**	**bbls**

State of New Mexico
Oil Conservation Division

Incident ID	nAPP2108858520
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?	50-100 ft(bgs)
Did this release impact groundwater or surface water?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ☒ No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☒ No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ☒ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☒ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☒ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☒ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☒ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☒ No
Did the release impact areas **not** on an exploration, development, production, or storage site?	☐ Yes ☒ No

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

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

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

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

State of New Mexico
Oil Conservation Division

Incident ID	nAPP2108858520
District RP	
Facility ID	
Application ID	

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

Printed Name: Kyle Littrell Title: Environmental Manager

Signature: Date: 05/17/2021

email: Kyle.Littrell@exxonmobil.com Telephone: (432)-221-7331

OCD Only

Received by: Date:

Incident ID	nAPP2108858520
District RP	
Facility ID	
Application ID	

Closure

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

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

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

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

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

☒ Description of remediation activities

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

Printed Name: Kyle Littrell Title: Environmental Manager

Signature: Date: 05/17/2021

email: Kyle.Littrell@exxonmobil.com Telephone: 432-221-7331

OCD Only

Received by: Date:

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

Closure Approved by: Date:

Printed Name: Title:

Form C-141
Page 4

State of New Mexico
Oil Conservation Division

Incident ID	nAPP2108858520
District RP	
Facility ID	
Application ID	

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Printed Name: Kyle Littrell Title: Environmental Manager

Signature: Date: 05/17/2021

email: Kyle.Littrell@exxonmobil.com Telephone: (432)-221-7331

OCD Only

Received by: Date:

State of New Mexico
Oil Conservation Division

Incident ID	nAPP2108858520
District RP	
Facility ID	
Application ID	

Closure

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☒ Description of remediation activities

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

Printed Name: Kyle Littrell Title: Environmental Manager

Signature: Date: 05/17/2021

email: Kyle.Littrell@exxonmobil.com Telephone: 432-221-7331

OCD Only

Received by: Robert Hamlet Date: 7/28/2021

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

Closure Approved by: Robert Hamlet Date: 7/28/2021

Printed Name: Robert Hamlet Title: Environmental Specialist - Advanced

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

May 18, 2021

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

Re: Closure Request
Ross Draw 25-31
Incident Number nAPP2108858520
Eddy County, New Mexico

To Whom It May Concern:

WSP USA Inc. (WSP) on behalf of XTO Energy, Inc. (XTO), presents the following Closure Request detailing site assessment and soil sampling activities at the Ross Draw 25-31 (Site) located in Unit D, Section 25, Township 26 South, Range 29 East, in Eddy County, New Mexico (Figure 1). The purpose of the site assessment and soil sampling activities was to assess for the presence or absence of impacts to soil following the release of crude oil within lined containment at the Site. Based on field observations, field screening activities, and soil sample laboratory analytical results, XTO is submitting this Closure Request and requesting no further action (NFA) for Incident Number nAPP2108858520.

RELEASE BACKGROUND

On March 15, 2021, a level switch malfunctioned, resulting in the release of approximately 22 barrels (bbls) of crude oil into the lined tank battery containment. A vacuum truck was immediately dispatched to the Site to recover freestanding fluids; all 22 bbls of the released crude oil were recovered from within the lined containment. A 48-hour advance notice of liner inspection was provided via email to New Mexico Oil Conservation Division (NMOCD) District II office. A liner integrity inspection was conducted by XTO personnel following the fluid recovery and upon inspection, the liner was determined to be insufficient. XTO submitted a Release Notification Form C-141 (Form C-141) on March 29, 2021. The release was assigned Incident Number nAPP2108858520.

SITE CHARACTERIZATION

WSP characterized the Site 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). Depth to groundwater at the Site is estimated to be between 50-100 feet below ground surface (bgs) based on the nearest groundwater well data. The closest permitted groundwater well with depth to groundwater data is United States Geological Survey (USGS) well

320154103562301, located approximately 0.86 miles northeast of the Site. The groundwater well has a reported depth to groundwater of 66 feet bgs and a total depth of 200 feet bgs. All wells used for depth to groundwater determination are depicted on Figure 1 and referenced well records are provided in Attachment 1.

The closest continuously flowing water or significant watercourse to the Site is an intermittent riverine, located approximately 0.2 miles southeast of the Site. The Site is greater than 200 feet from a lakebed, sinkhole, or playa lake and greater than 300 feet from an occupied residence, school, hospital, institution, church, or wetland. The Site is greater than 1,000 feet to a freshwater well or spring and is not within a 100-year floodplain or overlying a subsurface mine. The Site is not underlain by unstable geology (medium potential karst designation area). Site receptors are identified on Figure 1.

CLOSURE CRITERIA

Based on the results of the Site Characterization, the following NMOCD Table 1 Closure Criteria (Closure Criteria) apply:

- 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
- TPH: 2,500 mg/kg
- Chloride: 10,000 mg/kg

SITE ASSESSMENT ACTIVITIES AND ANALYTICAL RESULTS

On April 27, 2021, WSP personnel were at the Site to evaluate the release extent based on information provided on the Form C-141 and visual observations. WSP personnel advanced one borehole (BH01) via hand-auger at the location of the tear in the liner identified during the liner integrity inspection. Two soil samples were collected from borehole BH01 at depths of approximately 0.5 feet and 1-foot bgs. Soil from the borehole was field screened for volatile aromatic hydrocarbons and chloride utilizing a calibrated photo-ionization detector (PID) and Hach® chloride QuanTab® test strips, respectively. Field screening results and observations from the borehole were documented on a lithologic/soil sampling log which is included as Attachment 2. The borehole was backfilled with the soil removed and XTO repaired the tear in the liner. The borehole delineation soil sample location is depicted on Figure 2. Photographic documentation was conducted during the Site visit. The photographic log is included in Attachment 3.

The soil samples were placed directly into pre-cleaned glass jars, labeled with the location, date, time, sampler name, method of analysis, and immediately placed on ice. The soil samples were

transported at or below 4 degrees Celsius (°C) under strict chain-of-custody (COC) procedures to Eurofins Laboratories (Eurofins) in Carlsbad, New Mexico, for analysis of BTEX following United States Environmental Protection Agency (EPA) Method 8021B; TPH-gasoline range organics (GRO), TPH-diesel range organics (DRO), and TPH-oil range organics (ORO) following EPA Method 8015M/D; and chloride following EPA Method 300.0.

SOIL ANALYTICAL RESULTS

Laboratory analytical results for delineation soil samples BH01 and BH01A, collected at depths of approximately 0.5 feet and 1-foot bgs, indicated that benzene, BTEX, TPH-GRO/TPH-DRO, TPH, and chloride concentrations were compliant with the Closure Criteria. Laboratory analytical results are summarized in Table 1 and the complete laboratory analytical report is included as Attachment 4.

CLOSURE REQUEST

Following the failed liner integrity inspection at the Site, WSP personnel advanced one borehole (BH01) at the location of the tear in the liner to assess for the presence or absence of soil impacts resulting from the March 15, 2021 crude oil release within lined containment. Two delineation soil samples were collected from borehole BH01 at depths of approximately 0.5 feet and 1-foot bgs. Laboratory analytical results indicated that benzene, BTEX, TPH-GRO/TPH-DRO, TPH, and chloride concentrations were compliant with the Closure Criteria. Additionally, field screening of soil from the borehole indicated no elevated volatile aromatic hydrocarbons or chloride concentrations beneath the tear in the liner. The release was contained laterally by the lined containment and all released fluids were recovered during initial response activities. The tear in the liner was subsequently repaired.

Based on initial response efforts, absence of elevated field screening results, and soil sample laboratory analytical results compliant with the Closure Criteria directly below the tear in the liner, XTO respectfully requests NFA for Incident Number nAPP2108858520.

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

Sincerely,

WSP USA Inc.

Kalei Jennings

Ashley L. Ager, P.G.

Associate Consultant

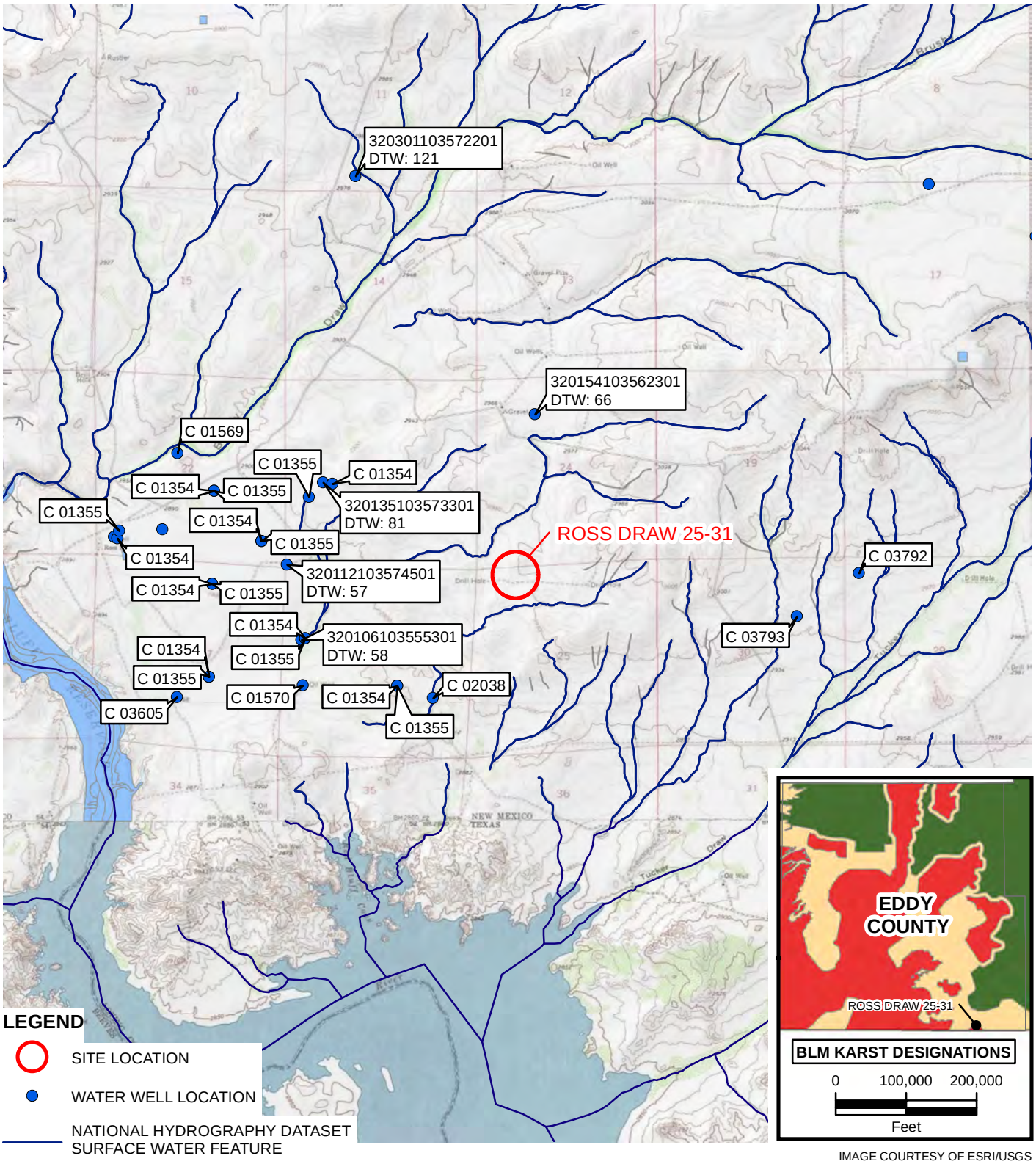
Managing Director, Geologist

cc: Kyle Littrell, XTO
Bureau of Land Management

Attachments:

Figure 1	Site Location Map
Figure 2	Delineation Soil Sample Locations
Table 1	Soil Analytical Results
Attachment 1	Referenced Well Records
Attachment 2	Lithologic/Sampling Logs
Attachment 3	Photographic Log
Attachment 4	Laboratory Analytical Reports

FIGURES



LEGEND

- SITE LOCATION
- WATER WELL LOCATION
- NATIONAL HYDROGRAPHY DATASET SURFACE WATER FEATURE
- NATIONAL WETLANDS INVENTORY SURFACE WATER FEATURE
- LOW KARST
- MEDIUM KARST
- HIGH KARST

DTW: DEPTH TO WATER IN FEET
BLM: BUREAU OF LAND MANAGEMENT
TD: TOTAL DEPTH IN FEET
NOTE: INCIDENT NUMBER nAPP2108858520

FIGURE 1
SITE LOCATION MAP
ROSS DRAW 25-31
UNIT D SEC 25 T26S R29E
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC

P:\XTO Energy\GIS\MXD\012921043_ROSS DRAW 25 BATTERY\012921043_FIG01_SL_RECEPTOR_2021.mxd

IMAGE COURTESY OF ESRI

0 50 100
Feet

N

LEGEND

DELINEATION SOIL SAMPLE IN COMPLIANCE WITH APPLICABLE CLOSURE CRITERIA

INFRASTRUCTURE

NOTE: INCIDENT NUMBER nAPP2108858520
SAMPLE ID@DEPTH BELOW GROUND SURFACE (FEET)

FIGURE 2
DELINEATION SOIL SAMPLE LOCATIONS
ROSS DRAW 25-31
UNIT D SEC 25 T26S R29E
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.

P:\XTO Energy\GIS\MXD\012921043_ROSS DRAW 25 BATTERY\012921043_FIG02_DELINEATION_2021.mxd

TABLES

Table 1

Soil Analytical Results
Ross Draw 25-31
Incident Number NAPP2108858520
Eddy County, New Mexico

Sample ID	Sample Date	Sample Depth (ft bgs)	Benzene (mg/kg)	BTEX (mg/kg)	TPH-GRO (mg/kg)	TPH-DRO (mg/kg)	TPH-ORO (mg/kg)	Total GRO+DRO (mg/kg)	TPH (mg/kg)	Chloride (mg/kg)
NMOCD Table 1 Closure Criteria (NMAC 19.15.29)			**10**	**50**	NE	NE	NE	**1,000**	**2,500**	**10,000**
Delineation Samples										
BH01	4/27/2021	0.5	<0.00200	<0.00401	<49.9	<49.9	<49.9	<50.0	<49.9	118
BH01A	4/27/2021	1	<0.00199	<0.00398	<49.9	<49.9	<49.9	<50.0	<49.9	59.8

ft - feet/foot

mg/kg - milligrams per kilograms

BTEX - benzene, toluene, ethylbenzene, and total xylenes

TPH - total petroleum hydrocarbons

DRO - diesel range organics

GRO - gasoline range organics

ORO - motor oil range organics

NMOCD - New Mexico Oil Conservation Division

NMAC - New Mexico Administrative Code

< - indicates result is less than the stated laboratory method practical quantitation limit

NE - Not Established

BOLD - indicates results exceed the higher of the background sample result or applicable regulatory standard

ATTACHMENT 1: REFERENCED WELL RECORDS

National Water Information System: Web Interface

USGS Water Resources

Data Category: Site Information | Geographic Area: United States | GO

Click to hideNews Bulletins

- Introducing The Next Generation of USGS Water Data for the Nation
- Full News

USGS 320154103562301 26S.29E.22.23341

Available data for this site SUMMARY OF ALL AVAILABLE DATA | GO

Well Site

DESCRIPTION:

Latitude 32°01'54", Longitude 103°56'23" NAD27
Eddy County, New Mexico , Hydrologic Unit 13070001
Well depth: 200 feet
Land surface altitude: 2,974 feet above NAVD88.
Well completed in "Rustler Formation" (312RSLR) local aquifer

AVAILABLE DATA:

Data Type	Begin Date	End Date	Count
Field groundwater-level measurements	1975-12-09	1998-01-22	8
Revisions	Unavailable (site:0) (timeseries:0)		

OPERATION:

Record for this site is maintained by the USGS New Mexico Water Science Center
Email questions about this site to New Mexico Water Science Center Water-Data Inquiries

---

Questions about sites/data?
Feedback on this web site
Automated retrievals
Help
Data Tips
Explanation of terms
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U.S. Department of the Interior | U.S. Geological Survey

Title: NWIS Site Information for USA: Site Inventory
URL: https://nwis.waterdata.usgs.gov/nwis/inventory/?site_no=320154103562301&agency_cd=USGS

Page Contact Information: New Mexico Water Data Support Team
Page Last Modified: 2021-01-06 18:02:13 EST
0.27 0.27 nadww01

National Water Information System: Web Interface

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- Full News

Groundwater levels for the Nation

Search Results -- 1 sites found

Agency code = usgs
site_no list =
- 320154103562301

Minimum number of levels = 1

Save file of selected sites to local disk for future upload

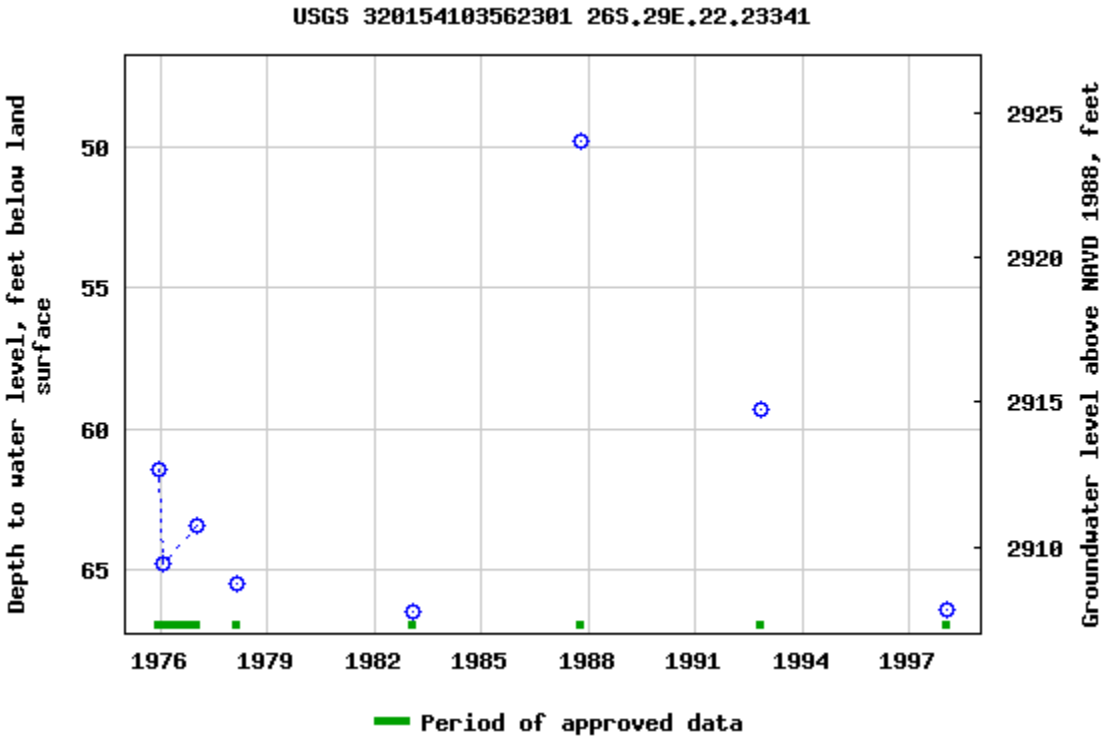
USGS 320154103562301 26S.29E.22.23341

Available data for this site Groundwater: Field measurements GO

Eddy County, New Mexico
Hydrologic Unit Code 13070001
Latitude 32°01'54", Longitude 103°56'23" NAD27
Land-surface elevation 2,974 feet above NAVD88
The depth of the well is 200 feet below land surface.
This well is completed in the Rustler Formation (312RSLR) local aquifer.

Output formats

Table of data
Tab-separated data
Graph of data
Reselect period



Breaks in the plot represent a gap of at least one year between field measurements.
Download a presentation-quality graph

Questions about sites/data?
Feedback on this web site
Automated retrievals
Help
Data Tips
Explanation of terms

Subscribe for system changes
News

Accessibility FOIA Privacy Policies and Notices

U.S. Department of the Interior | U.S. Geological Survey
Title: Groundwater for USA: Water Levels
URL: https://nwis.waterdata.usgs.gov/nwis/gwlevels?

Page Contact Information: USGS Water Data Support Team
Page Last Modified: 2021-01-06 18:04:56 EST
0.65 0.58 nadww01

ATTACHMENT 2: LITHOLOGIC/SAMPLING LOG

WSP USA

508 West Stevens Street
Carlsbad, New Mexico 88220

BH or PH Name:	Date:
BH01	4/27/2021

Site Name Ross Draw 25-31 Battery

RP or Incident Number: nAPP2108858520

LTE Job Number: TE012921043

LITHOLOGIC / SOIL SAMPLING LOG

Logged By EN	Method: Hand Auger

Lat/Long:	Field Screening:	Hole Diameter:	Total Depth:
32.01942, -103.94191	Chloride, PID	4"	4'

Comments:
Advanced via hand auger till refusal, sampling took place at 0.5', 1', and 4' bgs

Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithology/Remarks
M	<184	0	N	BH01	0.5	1	CCHE	0'-0.5' : poorly consolidated, sandy, tan/brown, no staining, odor, moist
M	<184	0	N	BH01A	1	2	SP-SC	0.5' - 4' : SAND, fine grain, poorly graded, red/brown, no staining, odor, moist
						3		
						4		4' : CALICHE, highly consolidated, some sand, tan, no staining, odor, moist
						5	CCHE	Refusal at 4' Total depth: 4'
						6		
						7		
						8		
						9		
						10		
						11		
						12		
						13		
						14		
						15		
						16		
						17		
						18		
						19		
						20		
						21		
						22		
						23		
						24		
						25		

ATTACHMENT 3: PHOTOGRAPHIC LOG

PHOTOGRAPHIC LOG		
XTO Energy, Inc.	Ross Draw 25-31 Eddy County, New Mexico	TE012921043

Photo No.	Date	
1	April 19, 2020	
View of the liner breach near the western edge of the liner.		

PHOTOGRAPHIC LOG		
XTO Energy, Inc.	Ross Draw 25-31 Eddy County, New Mexico	TE012921043

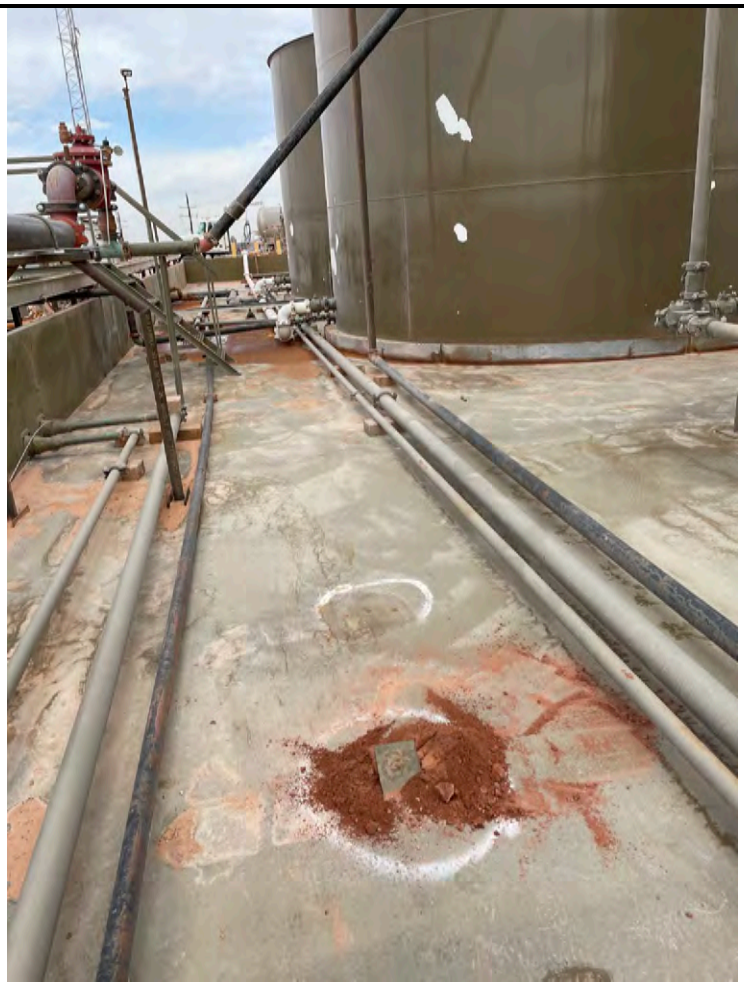
Photo No.	Date
2	April 27, 2021

View of liner breach and soil near western edge of the liner prior to delineation.

PHOTOGRAPHIC LOG		
XTO Energy, Inc.	Ross Draw 25-31 Eddy County, New Mexico	TE012921043

Photo No.	Date
3	April 27, 2021

View of liner breach and soil near western edge of the liner after delineation.



ATTACHMENT 4: LABORATORY ANALYTICAL RESULTS

eurofins | Environment Testing America

ANALYTICAL REPORT

Eurofins Xenco, Carlsbad
1089 N Canal St.
Carlsbad, NM 88220
Tel: (575)988-3199

Laboratory Job ID: 890-579-1
Laboratory Sample Delivery Group: TE012921043
Client Project/Site: Ross Draw 25-31

For:
WSP USA Inc.
2777 N. Stemmons Freeway
Suite 1600
Dallas, Texas 75207

Attn: Dan Moir

JKramer

Authorized for release by:
5/4/2021 3:27:24 PM

Jessica Kramer, Project Manager
(432)704-5440
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This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

Results relate only to the items tested and the sample(s) as received by the laboratory.

Client: WSP USA Inc.
Project/Site: Ross Draw 25-31

Laboratory Job ID: 890-579-1
SDG: TE012921043

Table of Contents

Definitions/Glossary

Client: WSP USA Inc. Job ID: 890-579-1
Project/Site: Ross Draw 25-31 SDG: TE012921043

Qualifiers

GC VOA

Qualifier	Qualifier Description
S1+	Surrogate recovery exceeds control limits, high biased.
U	Indicates the analyte was analyzed for but not detected.

GC Semi VOA

Qualifier	Qualifier Description
U	Indicates the analyte was analyzed for but not detected.

HPLC/IC

Qualifier	Qualifier Description
U	Indicates the analyte was analyzed for but not detected.

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
¤	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
QC	Quality Control
RER	Relative Error Ratio (Radiochemistry)
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)
TNTC	Too Numerous To Count

Case Narrative

Client: WSP USA Inc.
Project/Site: Ross Draw 25-31

Job ID: 890-579-1
SDG: TE012921043

Job ID: 890-579-1

Laboratory: Eurofins Xenco, Carlsbad

Narrative

Job Narrative
890-579-1

Receipt
The samples were received on 4/27/2021 11:15 AM. Unless otherwise noted below, the samples arrived in good condition, and, where required, properly preserved and on ice. The temperature of the cooler at receipt time was 5.4°C

Receipt Exceptions
The following samples analyzed for method BTEX 8021 were received and analyzed from an unpreserved bulk soil jar: BH01 (890-579-1) and BH01A (890-579-2).

GC VOA
Method 8021B: Surrogate recovery for the following sample was outside control limits: BH01A (890-579-2). Evidence of matrix interference is present; therefore, re-extraction and/or re-analysis was not performed.

Method 8021B: Internal standard responses were outside of acceptance limits for the following sample: BH01A (890-579-2). The sample(s) shows evidence of matrix interference.

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

GC Semi VOA
No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

HPLC/IC
No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Client Sample Results

Client: WSP USA Inc.
Project/Site: Ross Draw 25-31

Job ID: 890-579-1
SDG: TE012921043

Client Sample ID: BH01

Lab Sample ID: 890-579-1
Matrix: Solid
Date Collected: 04/27/21 08:55
Date Received: 04/27/21 11:15
Sample Depth: - 0.5

Method: 8021B - Volatile Organic Compounds (GC)

Analyte	Result	Qualifier	RL		Unit	D	Prepared	Analyzed	Dil Fac
Benzene	<0.00200	U	0.00200		mg/Kg		04/29/21 11:00	04/30/21 06:51	1
Toluene	<0.00200	U	0.00200		mg/Kg		04/29/21 11:00	04/30/21 06:51	1
Ethylbenzene	<0.00200	U	0.00200		mg/Kg		04/29/21 11:00	04/30/21 06:51	1
m-Xylene & p-Xylene	<0.00401	U	0.00401		mg/Kg		04/29/21 11:00	04/30/21 06:51	1
o-Xylene	<0.00200	U	0.00200		mg/Kg		04/29/21 11:00	04/30/21 06:51	1
Xylenes, Total	<0.00401	U	0.00401		mg/Kg		04/29/21 11:00	04/30/21 06:51	1
Total BTEX	<0.00401	U	0.00401		mg/Kg		04/29/21 11:00	04/30/21 06:51	1

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
4-Bromofluorobenzene (Surr)	*106*		*70 - 130*	*04/29/21 11:00*	*04/30/21 06:51*	*1*
1,4-Difluorobenzene (Surr)	*105*		*70 - 130*	*04/29/21 11:00*	*04/30/21 06:51*	*1*

Method: 8015B NM - Diesel Range Organics (DRO) (GC)

Analyte	Result	Qualifier	RL		Unit	D	Prepared	Analyzed	Dil Fac
Gasoline Range Organics (GRO)-C6-C10	<49.9	U	49.9		mg/Kg		04/28/21 13:56	04/29/21 02:25	1
Diesel Range Organics (Over C10-C28)	<49.9	U	49.9		mg/Kg		04/28/21 13:56	04/29/21 02:25	1
Oil Range Organics (Over C28-C36)	<49.9	U	49.9		mg/Kg		04/28/21 13:56	04/29/21 02:25	1
Total TPH	<49.9	U	49.9		mg/Kg		04/28/21 13:56	04/29/21 02:25	1

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1-Chlorooctane	*104*		*70 - 130*	*04/28/21 13:56*	*04/29/21 02:25*	*1*
o-Terphenyl	*98*		*70 - 130*	*04/28/21 13:56*	*04/29/21 02:25*	*1*

Method: 300.0 - Anions, Ion Chromatography - Soluble

Analyte	Result	Qualifier	RL		Unit	D	Prepared	Analyzed	Dil Fac
Chloride	**118**		4.98		mg/Kg			05/04/21 06:42	1

Client Sample ID: BH01A

Lab Sample ID: 890-579-2
Matrix: Solid
Date Collected: 04/27/21 09:05
Date Received: 04/27/21 11:15
Sample Depth: - 1

Method: 8021B - Volatile Organic Compounds (GC)

Analyte	Result	Qualifier	RL		Unit	D	Prepared	Analyzed	Dil Fac
Benzene	<0.00199	U	0.00199		mg/Kg		04/29/21 11:00	04/30/21 07:11	1
Toluene	<0.00199	U	0.00199		mg/Kg		04/29/21 11:00	04/30/21 07:11	1
Ethylbenzene	<0.00199	U	0.00199		mg/Kg		04/29/21 11:00	04/30/21 07:11	1
m-Xylene & p-Xylene	<0.00398	U	0.00398		mg/Kg		04/29/21 11:00	04/30/21 07:11	1
o-Xylene	<0.00199	U	0.00199		mg/Kg		04/29/21 11:00	04/30/21 07:11	1
Xylenes, Total	<0.00398	U	0.00398		mg/Kg		04/29/21 11:00	04/30/21 07:11	1
Total BTEX	<0.00398	U	0.00398		mg/Kg		04/29/21 11:00	04/30/21 07:11	1

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
4-Bromofluorobenzene (Surr)	*132*	*S1+*	*70 - 130*	*04/29/21 11:00*	*04/30/21 07:11*	*1*
1,4-Difluorobenzene (Surr)	*95*		*70 - 130*	*04/29/21 11:00*	*04/30/21 07:11*	*1*

Client Sample Results

Client: WSP USA Inc.
Project/Site: Ross Draw 25-31

Job ID: 890-579-1
SDG: TE012921043

Client Sample ID: BH01A

Date Collected: 04/27/21 09:05
Date Received: 04/27/21 11:15
Sample Depth: - 1

Lab Sample ID: 890-579-2

Matrix: Solid

Method: 8015B NM - Diesel Range Organics (DRO) (GC)

Analyte	Result	Qualifier	RL		Unit	D	Prepared	Analyzed	Dil Fac
Gasoline Range Organics (GRO)-C6-C10	<49.9	U	49.9		mg/Kg		04/28/21 13:56	04/29/21 02:47	1
Diesel Range Organics (Over C10-C28)	<49.9	U	49.9		mg/Kg		04/28/21 13:56	04/29/21 02:47	1
Oil Range Organics (Over C28-C36)	<49.9	U	49.9		mg/Kg		04/28/21 13:56	04/29/21 02:47	1
Total TPH	<49.9	U	49.9		mg/Kg		04/28/21 13:56	04/29/21 02:47	1

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1-Chlorooctane	*109*		*70 - 130*	*04/28/21 13:56*	*04/29/21 02:47*	*1*
o-Terphenyl	*101*		*70 - 130*	*04/28/21 13:56*	*04/29/21 02:47*	*1*

Method: 300.0 - Anions, Ion Chromatography - Soluble

Analyte	Result	Qualifier	RL		Unit	D	Prepared	Analyzed	Dil Fac
Chloride	**59.8**		5.00		mg/Kg			05/04/21 06:47	1

Surrogate Summary

Client: WSP USA Inc.
Project/Site: Ross Draw 25-31

Job ID: 890-579-1
SDG: TE012921043

Method: 8021B - Volatile Organic Compounds (GC)

Matrix: Solid **Prep Type: Total/NA**

		Percent Surrogate Recovery (Acceptance Limits)	
		BFB1	DFBZ1
Lab Sample ID	Client Sample ID	(70-130)	(70-130)
890-579-1	BH01	106	105
890-579-2	BH01A	132 S1+	95
LCS 880-2388/1-A	Lab Control Sample	99	106
LCSD 880-2388/2-A	Lab Control Sample Dup	101	107
MB 880-2388/5-A	Method Blank	100	101
MB 880-2471/8	Method Blank	100	101

Surrogate Legend

BFB = 4-Bromofluorobenzene (Surr)
DFBZ = 1,4-Difluorobenzene (Surr)

Method: 8015B NM - Diesel Range Organics (DRO) (GC)

Matrix: Solid **Prep Type: Total/NA**

		Percent Surrogate Recovery (Acceptance Limits)	
		1CO1	OTPH1
Lab Sample ID	Client Sample ID	(70-130)	(70-130)
890-579-1	BH01	104	98
890-579-2	BH01A	109	101
LCS 880-2454/2-A	Lab Control Sample	106	95
LCSD 880-2454/3-A	Lab Control Sample Dup	107	96
MB 880-2454/1-A	Method Blank	100	98

Surrogate Legend

1CO = 1-Chlorooctane
OTPH = o-Terphenyl

QC Sample Results

Client: WSP USA Inc.
Project/Site: Ross Draw 25-31

Job ID: 890-579-1
SDG: TE012921043

Method: 8021B - Volatile Organic Compounds (GC)

Lab Sample ID: MB 880-2388/5-A
Matrix: Solid
Analysis Batch: 2471

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 2388

Analyte	MB Result	MB Qualifier	RL		Unit	D	Prepared	Analyzed	Dil Fac
Benzene	<0.00200	U	0.00200		mg/Kg		04/29/21 11:00	04/29/21 23:26	1
Toluene	<0.00200	U	0.00200		mg/Kg		04/29/21 11:00	04/29/21 23:26	1
Ethylbenzene	<0.00200	U	0.00200		mg/Kg		04/29/21 11:00	04/29/21 23:26	1
m-Xylene & p-Xylene	<0.00400	U	0.00400		mg/Kg		04/29/21 11:00	04/29/21 23:26	1
o-Xylene	<0.00200	U	0.00200		mg/Kg		04/29/21 11:00	04/29/21 23:26	1
Xylenes, Total	<0.00400	U	0.00400		mg/Kg		04/29/21 11:00	04/29/21 23:26	1
Total BTEX	<0.00400	U	0.00400		mg/Kg		04/29/21 11:00	04/29/21 23:26	1

Surrogate	*MB %Recovery*	*MB Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
4-Bromofluorobenzene (Surr)	*100*		*70 - 130*	*04/29/21 11:00*	*04/29/21 23:26*	*1*
1,4-Difluorobenzene (Surr)	*101*		*70 - 130*	*04/29/21 11:00*	*04/29/21 23:26*	*1*

Lab Sample ID: LCS 880-2388/1-A
Matrix: Solid
Analysis Batch: 2471

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 2388

Analyte			Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits		
Benzene			0.100	0.1030		mg/Kg		103	70 - 130		
Toluene			0.100	0.1040		mg/Kg		104	70 - 130		
Ethylbenzene			0.100	0.1066		mg/Kg		107	70 - 130		
m-Xylene & p-Xylene			0.200	0.2180		mg/Kg		109	70 - 130		
o-Xylene			0.100	0.1047		mg/Kg		105	70 - 130		

Surrogate	*LCS %Recovery*	*LCS Qualifier*	*Limits*
4-Bromofluorobenzene (Surr)	*99*		*70 - 130*
1,4-Difluorobenzene (Surr)	*106*		*70 - 130*

Lab Sample ID: LCSD 880-2388/2-A
Matrix: Solid
Analysis Batch: 2471

Client Sample ID: Lab Control Sample Dup
Prep Type: Total/NA
Prep Batch: 2388

Analyte			Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	RPD Limit
Benzene			0.100	0.1059		mg/Kg		106	70 - 130	3	35
Toluene			0.100	0.1072		mg/Kg		107	70 - 130	3	35
Ethylbenzene			0.100	0.1097		mg/Kg		110	70 - 130	3	35
m-Xylene & p-Xylene			0.200	0.2246		mg/Kg		112	70 - 130	3	35
o-Xylene			0.100	0.1091		mg/Kg		109	70 - 130	4	35

Surrogate	*LCSD %Recovery*	*LCSD Qualifier*	*Limits*
4-Bromofluorobenzene (Surr)	*101*		*70 - 130*
1,4-Difluorobenzene (Surr)	*107*		*70 - 130*

Lab Sample ID: MB 880-2471/8
Matrix: Solid
Analysis Batch: 2471

Client Sample ID: Method Blank
Prep Type: Total/NA

Analyte	MB Result	MB Qualifier	RL		Unit	D	Prepared	Analyzed	Dil Fac
Benzene	<0.00200	U	0.00200		mg/Kg			04/29/21 11:51	1

QC Sample Results

Client: WSP USA Inc.
Project/Site: Ross Draw 25-31

Job ID: 890-579-1
SDG: TE012921043

Method: 8021B - Volatile Organic Compounds (GC) (Continued)

Lab Sample ID: MB 880-2471/8
Matrix: Solid
Analysis Batch: 2471

Client Sample ID: Method Blank
Prep Type: Total/NA

Analyte	MB Result	MB Qualifier	RL		Unit	D	Prepared	Analyzed	Dil Fac
Toluene	<0.00200	U	0.00200		mg/Kg			04/29/21 11:51	1
Ethylbenzene	<0.00200	U	0.00200		mg/Kg			04/29/21 11:51	1
m-Xylene & p-Xylene	<0.00400	U	0.00400		mg/Kg			04/29/21 11:51	1
o-Xylene	<0.00200	U	0.00200		mg/Kg			04/29/21 11:51	1
Xylenes, Total	<0.00400	U	0.00400		mg/Kg			04/29/21 11:51	1
Total BTEX	<0.00400	U	0.00400		mg/Kg			04/29/21 11:51	1

Surrogate	*MB %Recovery*	*MB Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
4-Bromofluorobenzene (Surr)	*100*		*70 - 130*		*04/29/21 11:51*	*1*
1,4-Difluorobenzene (Surr)	*101*		*70 - 130*		*04/29/21 11:51*	*1*

Method: 8015B NM - Diesel Range Organics (DRO) (GC)

Lab Sample ID: MB 880-2454/1-A
Matrix: Solid
Analysis Batch: 2421

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 2454

Analyte	MB Result	MB Qualifier	RL		Unit	D	Prepared	Analyzed	Dil Fac
Gasoline Range Organics (GRO)-C6-C10	<50.0	U	50.0		mg/Kg		04/28/21 13:56	04/28/21 22:08	1
Diesel Range Organics (Over C10-C28)	<50.0	U	50.0		mg/Kg		04/28/21 13:56	04/28/21 22:08	1
OII Range Organics (Over C28-C36)	68.05		50.0		mg/Kg		04/28/21 13:56	04/28/21 22:08	1
Total TPH	68.05		50.0		mg/Kg		04/28/21 13:56	04/28/21 22:08	1

Surrogate	*MB %Recovery*	*MB Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1-Chlorooctane	*100*		*70 - 130*	*04/28/21 13:56*	*04/28/21 22:08*	*1*
o-Terphenyl	*98*		*70 - 130*	*04/28/21 13:56*	*04/28/21 22:08*	*1*

Lab Sample ID: LCS 880-2454/2-A
Matrix: Solid
Analysis Batch: 2421

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 2454

Analyte			Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits		
Gasoline Range Organics (GRO)-C6-C10			1000	934.9		mg/Kg		93	70 - 130		
Diesel Range Organics (Over C10-C28)			1000	846.9		mg/Kg		85	70 - 130		

Surrogate	*LCS %Recovery*	*LCS Qualifier*	*Limits*
1-Chlorooctane	*106*		*70 - 130*
o-Terphenyl	*95*		*70 - 130*

QC Sample Results

Client: WSP USA Inc.
Project/Site: Ross Draw 25-31

Job ID: 890-579-1
SDG: TE012921043

Method: 8015B NM - Diesel Range Organics (DRO) (GC) (Continued)

Lab Sample ID: LCSD 880-2454/3-A
Matrix: Solid
Analysis Batch: 2421

Client Sample ID: Lab Control Sample Dup
Prep Type: Total/NA
Prep Batch: 2454

Analyte			Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	RPD Limit
Gasoline Range Organics (GRO)-C6-C10			1000	1012		mg/Kg		101	70 - 130	8	20
Diesel Range Organics (Over C10-C28)			1000	864.4		mg/Kg		86	70 - 130	2	20

Surrogate	*LCSD %Recovery*	*LCSD Qualifier*	*Limits*
1-Chlorooctane	*107*		*70 - 130*
o-Terphenyl	*96*		*70 - 130*

Method: 300.0 - Anions, Ion Chromatography

Lab Sample ID: MB 880-2602/1-A
Matrix: Solid
Analysis Batch: 2647

Client Sample ID: Method Blank
Prep Type: Soluble

Analyte	MB Result	MB Qualifier	RL		Unit	D	Prepared	Analyzed	Dil Fac
Chloride	<5.00	U	5.00		mg/Kg			05/04/21 04:17	1

Lab Sample ID: LCS 880-2602/2-A
Matrix: Solid
Analysis Batch: 2647

Client Sample ID: Lab Control Sample
Prep Type: Soluble

Analyte			Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits		
Chloride			250	247.6		mg/Kg		99	90 - 110		

Lab Sample ID: LCSD 880-2602/3-A
Matrix: Solid
Analysis Batch: 2647

Client Sample ID: Lab Control Sample Dup
Prep Type: Soluble

Analyte			Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	RPD Limit
Chloride			250	254.1		mg/Kg		102	90 - 110	3	20

QC Association Summary

Client: WSP USA Inc. Job ID: 890-579-1
Project/Site: Ross Draw 25-31 SDG: TE012921043

GC VOA

Prep Batch: 2388

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
890-579-1	BH01	Total/NA	Solid	5035	
890-579-2	BH01A	Total/NA	Solid	5035	
MB 880-2388/5-A	Method Blank	Total/NA	Solid	5035	
LCS 880-2388/1-A	Lab Control Sample	Total/NA	Solid	5035	
LCSD 880-2388/2-A	Lab Control Sample Dup	Total/NA	Solid	5035	

Analysis Batch: 2471

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
890-579-1	BH01	Total/NA	Solid	8021B	2388
890-579-2	BH01A	Total/NA	Solid	8021B	2388
MB 880-2388/5-A	Method Blank	Total/NA	Solid	8021B	2388
MB 880-2471/8	Method Blank	Total/NA	Solid	8021B	
LCS 880-2388/1-A	Lab Control Sample	Total/NA	Solid	8021B	2388
LCSD 880-2388/2-A	Lab Control Sample Dup	Total/NA	Solid	8021B	2388

GC Semi VOA

Analysis Batch: 2421

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
890-579-1	BH01	Total/NA	Solid	8015B NM	2454
890-579-2	BH01A	Total/NA	Solid	8015B NM	2454
MB 880-2454/1-A	Method Blank	Total/NA	Solid	8015B NM	2454
LCS 880-2454/2-A	Lab Control Sample	Total/NA	Solid	8015B NM	2454
LCSD 880-2454/3-A	Lab Control Sample Dup	Total/NA	Solid	8015B NM	2454

Prep Batch: 2454

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
890-579-1	BH01	Total/NA	Solid	8015NM Prep	
890-579-2	BH01A	Total/NA	Solid	8015NM Prep	
MB 880-2454/1-A	Method Blank	Total/NA	Solid	8015NM Prep	
LCS 880-2454/2-A	Lab Control Sample	Total/NA	Solid	8015NM Prep	
LCSD 880-2454/3-A	Lab Control Sample Dup	Total/NA	Solid	8015NM Prep	

HPLC/IC

Leach Batch: 2602

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
890-579-1	BH01	Soluble	Solid	DI Leach	
890-579-2	BH01A	Soluble	Solid	DI Leach	
MB 880-2602/1-A	Method Blank	Soluble	Solid	DI Leach	
LCS 880-2602/2-A	Lab Control Sample	Soluble	Solid	DI Leach	
LCSD 880-2602/3-A	Lab Control Sample Dup	Soluble	Solid	DI Leach	

Analysis Batch: 2647

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
890-579-1	BH01	Soluble	Solid	300.0	2602
890-579-2	BH01A	Soluble	Solid	300.0	2602
MB 880-2602/1-A	Method Blank	Soluble	Solid	300.0	2602
LCS 880-2602/2-A	Lab Control Sample	Soluble	Solid	300.0	2602
LCSD 880-2602/3-A	Lab Control Sample Dup	Soluble	Solid	300.0	2602

Lab Chronicle

Client: WSP USA Inc.
Project/Site: Ross Draw 25-31

Job ID: 890-579-1
SDG: TE012921043

Client Sample ID: BH01

Date Collected: 04/27/21 08:55
Date Received: 04/27/21 11:15

Lab Sample ID: 890-579-1

Matrix: Solid

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	5035			2388	04/29/21 11:00	KL	XM
Total/NA	Analysis	8021B		1	2471	04/30/21 06:51	MR	XM
Total/NA	Prep	8015NM Prep			2454	04/28/21 13:56	DM	XM
Total/NA	Analysis	8015B NM		1	2421	04/29/21 02:25	AJ	XM
Soluble	Leach	DI Leach			2602	05/03/21 08:47	CH	XM
Soluble	Analysis	300.0		1	2647	05/04/21 06:42	CH	XM

Client Sample ID: BH01A

Date Collected: 04/27/21 09:05
Date Received: 04/27/21 11:15

Lab Sample ID: 890-579-2

Matrix: Solid

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	5035			2388	04/29/21 11:00	KL	XM
Total/NA	Analysis	8021B		1	2471	04/30/21 07:11	MR	XM
Total/NA	Prep	8015NM Prep			2454	04/28/21 13:56	DM	XM
Total/NA	Analysis	8015B NM		1	2421	04/29/21 02:47	AJ	XM
Soluble	Leach	DI Leach			2602	05/03/21 08:47	CH	XM
Soluble	Analysis	300.0		1	2647	05/04/21 06:47	CH	XM

Laboratory References:

XM = Eurofins Xenco, Midland, 1211 W. Florida Ave, Midland, TX 79701, TEL (432)704-5440

Accreditation/Certification Summary

Client: WSP USA Inc.
Project/Site: Ross Draw 25-31

Job ID: 890-579-1
SDG: TE012921043

Laboratory: Eurofins Xenco, Midland

Unless otherwise noted, all analytes for this laboratory were covered under each accreditation/certification below.

Authority	Program	Identification Number	Expiration Date
Texas	NELAP	T104704400-20-21	06-30-21

The following analytes are included in this report, but the laboratory is not certified by the governing authority. This list may include analytes for which the agency does not offer certification.

Analysis Method	Prep Method	Matrix	Analyte
8015B NM	8015NM Prep	Solid	Total TPH
8021B	5035	Solid	Total BTEX

Method Summary

Client: WSP USA Inc.
Project/Site: Ross Draw 25-31

Job ID: 890-579-1
SDG: TE012921043

Method	Method Description	Protocol	Laboratory
8021B	Volatile Organic Compounds (GC)	SW846	XM
8015B NM	Diesel Range Organics (DRO) (GC)	SW846	XM
300.0	Anions, Ion Chromatography	MCAWW	XM
5035	Closed System Purge and Trap	SW846	XM
8015NM Prep	Microextraction	SW846	XM
DI Leach	Deionized Water Leaching Procedure	ASTM	XM

Protocol References:

ASTM = ASTM International

MCAWW = "Methods For Chemical Analysis Of Water And Wastes", EPA-600/4-79-020, March 1983 And Subsequent Revisions.

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

Laboratory References:

XM = Eurofins Xenco, Midland, 1211 W. Florida Ave, Midland, TX 79701, TEL (432)704-5440

Sample Summary

Client: WSP USA Inc.
Project/Site: Ross Draw 25-31

Job ID: 890-579-1
SDG: TE012921043

Lab Sample ID	Client Sample ID	Matrix	Collected	Received	Depth
890-579-1	BH01	Solid	04/27/21 08:55	04/27/21 11:15	- 0.5
890-579-2	BH01A	Solid	04/27/21 09:05	04/27/21 11:15	- 1

Spill Date 03/15/21

Chain of Custody

Work Order No: _____

XENCO LABORATORIES

Houston,TX (281) 240-4200 Dallas,TX (214) 902-0300 San Antonio,TX (210) 509-3334
Midland,TX (432-704-5440) EL Paso,TX (915)585-3443 Lubbock,TX (806)794-1296
Hobbs,NM (575-392-7550) Phoenix,AZ (480-355-0900) Atlanta,GA (770-449-8800) Tampa,FL (813-620-2000)

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Project Manager:	Dan Moir	Bill to: (if different)	Kyle Littrell
Company Name:	WSP USA Inc, Permian office	Company Name:	XTO Energy
Address:	3300 North A Street	Address:	522 West Mermond
City, State ZIP:	Midland, Tx 79705	City, State ZIP:	Carlsbad, NM 88220
Phone:	(432) 236-3849	Email:	elizabeth.naka@wsp.com, dan.moir@wsp.com

Work Order Comments

Program: UST/PST ☐ RP ☐ Brownfields ☐ RC ☐ Superfund ☐
State of Project:
Reporting:Level II ☐ Level III ☐ ST/UST ☐ RP ☐ Level IV ☐
Deliverables: EDD ☐ ADaPT ☐ Other:

Project Name:	Ross Draw 25-31	Turn Around	
Project Number:	TE012921043	Routine	X
P.O. Number:	Eddy County	Rush:	
Sampler's Name:	Elizabeth Naka	Due Date:	

SAMPLE RECEIPT				
Temp Blank:	(Yes) No	Wet Ice:	(Yes) No	
Temperature (°C):	5.6	Thermometer ID		
Received Intact:	(Yes) No	T-NM-007		
Cooler Custody Seals:	Yes (No) N/A	Correction Factor:	6.4	
Sample Custody Seals:	Yes (No) N/A	Total Containers:		

ANALYSIS REQUEST

890-579 Chain of Custody

Work Order Notes

TAT starts the day recevied by the lab, if received by 4:30pm

Sample Identification	Matrix	Date Sampled	Time Sampled	Depth	Number of Containers	TPH (EPA 8015)	BTEX (EPA 8021)	Chloride (EPA 300.0)	Sample Comments
BH01	S	4/27/21	0855	0.5'	1	X	X	X	composite
BH01A	S	4/27/21	0905	1'	1	X	X	X	composite

Total 200.7 / 6010 200.8 / 6020: 8RCRA 13PPM Texas 11 Al Sb As Ba Be B Cd Ca Cr Co Cu Fe Pb Mg Mn Mo Ni K Se Ag SiO2 Na Sr Tl Sn U V Zn

Circle Method(s) and Metal(s) to be analyzed **TCLP / SPLP 6010**: 8RCRA Sb As Ba Be Cd Cr Co Cu Pb Mn Mo Ni Se Ag Tl U **1631 / 245.1 / 7470 / 7471** : Hg

Notice: Signature of this document and relinquishment of samples constitutes a valid purchase order from client company to Xenco, its affiliates and subcontractors. It assigns standard terms and conditions of service. Xenco will be liable only for the cost of samples and shall not assume any responsibility for any losses or expenses incurred by the client if such losses are due to circumstances beyond the control of Xenco. A minimum charge of $75.00 will be applied to each project and a charge of $5 for each sample submitted to Xenco, but not analyzed. These terms will be enforced unless previously negotiated.

Relinquished by: (Signature)	Received by: (Signature)	Date/Time	Relinquished by: (Signature)	Received by: (Signature)	Date/Time
1	Gabby Ordonez	4/27/21 11:15	2		
3			4		
5			6		

Revised Date 051418 Rev. 2018.1

Eurofins Xenco, Carlsbad
1089 N Canal St.
Carlsbad, NM 88220
Phone 575-988-3199 Fax: 575-988-3199

Chain of Custody Record

eurofins | Environment Testing America

Client Information (Sub Contract Lab)	Sampler:	Lab PM: Kramer, Jessica	Carrier Tracking No(s):	COC No: 890-187 1
Client Contact: Shipping/Receiving	Phone:	E-Mail: jessica kramer@eurofinset.com	State of Origin: New Mexico	Page: Page 1 of 1
Company: Eurofins Xenco		Accreditations Required (See note): NELAP - Louisiana NELAP - Texas		Job #: 890-579-1
Address: 1211 W Florida Ave	Due Date Requested: 5/3/2021			
City: Midland	TAT Requested (days):			
State, Zip: TX, 79701				
Phone: 432-704-5440(Tel)	PO #:			
Email:	WO #:			
Project Name: Ross Draw 25-31	Project #: 89000004			
Site:	SSOW#:			

Analysis Requested

Sample Identification - Client ID (Lab ID)	Sample Date	Sample Time	Sample Type (C=Comp, G=grab)	Matrix (W=water S=solid, O=waste/oil, BT=Tissue, A=Air)	Field Filtered Sample (Yes or No)	Perform MS/MSD (Yes or No)	8015MOD_NM/8015NM_S_Prep Full TPH	300_ORGFM_28D/DI_LEACH Chloride	8021B/5035FP_Calc BTEX	Total Number of containers	Special Instructions/Note:
			Preservation Code:		X	X				X	
BH01 (890-579-1)	4/27/21	08 55 Mountain		Solid			X	X	X	1	
BH01A (890-579-2)	4/27/21	09 05 Mountain		Solid			X	X	X	1	

Preservation Codes

A HCL, B NaOH, C Zn Acetate, D Nitric Acid, E NaHSO4, F MeOH, G Amchlor, H Ascorbic Acid, I Ice, J DI Water, K EDTA, L EDA
M Hexane, N - None, O AsNaO2, P - Na2O4S, Q Na2SO3, R Na2S2O3, S - H2SO4, T TSP Dodecahydrate, U Acetone, V MCAA, W pH 4-5, Z other (specify)

Other:

Note: Since laboratory accreditations are subject to change Eurofins Xenco LLC places the ownership of method, analyte & accreditation compliance upon out subcontract laboratories. This sample shipment is forwarded under chain-of-custody If the laboratory does not currently maintain accreditation in the State of Origin listed above for analysis/tests/matrix being analyzed the samples must be shipped back to the Eurofins Xenco LLC laboratory or other instructions will be provided Any changes to accreditation status should be brought to Eurofins Xenco LLC attention immediately If all requested accreditations are current to date return the signed Chain of Custody attesting to said complicance to Eurofins Xenco LLC.

Possible Hazard Identification
Unconfirmed

Deliverable Requested I II III, IV Other (specify) — Primary Deliverable Rank 2

Sample Disposal (A fee may be assessed if samples are retained longer than 1 month)
☐ *Return To Client* ☐ *Disposal By Lab* ☐ *Archive For* ______ *Months*

Special Instructions/QC Requirements.

Empty Kit Relinquished by	Date	Time	Method of Shipment:

Relinquished by	Date/Time	Company	Received by	Date/Time	Company
Relinquished by: [signature]	4-27-21		Received by: [signature]	4-28-21 1:00 PM	
Relinquished by:			Received by:		
Relinquished by:			Received by:		

Custody Seals Intact. Δ Yes Δ No	Custody Seal No	Cooler Temperature(s) °C and Other Remarks.

Ver: 11/01/2020

Login Sample Receipt Checklist

Client: WSP USA Inc.

Job Number: 890-579-1
SDG Number: TE012921043

Login Number: 579
List Number: 1
Creator: Ordonez, Gabby

List Source: Eurofins Carlsbad

Question	Answer	Comment
The cooler's custody seal, if present, is intact.	True	
Sample custody seals, if present, are intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	N/A	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	N/A	

Login Sample Receipt Checklist

Client: WSP USA Inc.

Job Number: 890-579-1
SDG Number: TE012921043

Login Number: 579
List Number: 2
Creator: Copeland, Tatiana

List Source: Eurofins Midland
List Creation: 04/28/21 01:11 PM

Question	Answer	Comment
The cooler's custody seal, if present, is intact.	True	
Sample custody seals, if present, are intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	True	

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

Action 30635

CONDITIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 30635
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	We have received your closure report and final C-141 for Incident #NAPP2108858520 ROSS DRAW 25-31 BATTERY, thank you. This closure is approved.	7/28/2021