

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  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

## NM OIL CONSERVATION

ARTESIA DISTRICT

Form C-141

Revised August 8, 2011

MAR 19 2015

Submit 1 Copy to appropriate District Office in  
accordance with 19.15.29 NMAC.

RECEIVED

## Release Notification and Corrective Action

**OPERATOR** ☒ Initial Report ☐ Final Report

Name of Company: BOPCO, L.P. **260737** Contact: Tony Savoie  
Address: 522 W. Mermod, Suite 704 Carlsbad, N.M. 88220 Telephone No. 575-887-7329  
Facility Name: PLU-301H Facility Type: Exploration and Production

Surface Owner: Federal Mineral Owner: Federal API No. 30-015-36924

## LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
F	27	24S	30E	2460	North	2310	West	Eddy

Latitude N 32.189307 Longitude W 103.870133

## NATURE OF RELEASE

Type of Release: Crude oil and produced water	Volume of Release: 13 Bbls crude oil and 13 Bbls PW	Volume Recovered: 3 Bbls crude oil and 2 Bbls PW
Source of Release: Stuffing box	Date and Hour of Occurrence: 3/16/15 time unknown	Date and Hour of Discovery: 3/16/15 at approximately 4:00 p.m.
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? NMOCD and BLM	
By Whom? Brad Blevins	Date and Hour: 3/16/15 at approx. 5:00 p.m.	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	
If a Watercourse was Impacted, Describe Fully.*		
Describe Cause of Problem and Remedial Action Taken.* The stuffing box packing failed, the E-pot designed to shut down the well and control fluids failed to operate properly. The well was shut in. Repair crews re-aligned the well and replaced the stuffing box on 3/17/15.		
Describe Area Affected and Cleanup Action Taken.* The release impacted approximately 9,537 of caliche well pad with standing puddles and flow paths. It also misted approximately 15,000 sq.ft. of pad and approximately 9,000 sq.ft. of pasture area with a light mist. Crews washed down the rig and all of the free standing fluid was recovered. EPI remediation crew responded on 3/17/15. The saturated soil was scraped up, 20 cubic yards of soil was hauled to Lea Lands		
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.		

Signature: <u>Tony Savoie</u>		<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Tony Savoie		Approved by Environmental Specialist <u>Signed By: [Signature]</u>	
Title: Waste Management and Remediation Specialist		Approval Date: <u>3/20/15</u>	Expiration Date: <u>N/A</u>
E-mail Address: tasavoie@basspet.com		Conditions of Approval:	
Date: <u>3/19/15</u>	Phone: 432-556-8730	Attached <input type="checkbox"/>	

Remediation per O.C.D. Rules & Guidelines  
SUBMIT REMEDIATION PROPOSAL NO  
LATER THAN: 4/20/15

\* Attach Additional Sheets If Necessary

2RP.2900

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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	nAB1507941546
District RP	2RP-2900
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party: XTO Energy, Inc	OGRID: 5380
Contact Name: Kyle Littrell	Contact Telephone: (432)-221-7331
Contact email: Kyle_Littrell@xtoenergy.com	Incident #: 2RP-2900
Contact mailing address: 522 W. Mermod, Suite 704 Carlsbad, NM 88220	

### Location of Release Source

Latitude N 32.189307 Longitude W 103.870133  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: PLU 301H	Site Type: Production Well Facility
Date Release Discovered: 3/16/2015	API# (if applicable): 30-015-36924

Unit Letter	Section	Township	Range	County
F	27	24S	30E	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)

<input checked="" type="checkbox"/> Crude Oil	Volume Released (bbls): 13	Volume Recovered (bbls): 3
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls): 13	Volume Recovered (bbls): 2
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

#### Cause of Release

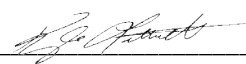
The stuffing box packing failed, the E-pot designed to shut down the well and control fluids failed to operate properly. The release impacted approximately 9,537 of caliche well pad and misted approximately 15,000 sq.ft. of pad and approximately 9,000 sq.ft. of pasture area with a light mist. The saturated soil was scraped up, 20 cubic yards of soil was hauled to Lea Lands.

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Was this a major release as defined by 19.15.29.7(A) NMAC?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? Release greater than 25 bbls
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? By Brad Blevins to NMOCD and BLM on 3-16-2015.	

### Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> 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: <u>Kyle Littrell</u>	Title: <u>SH&amp;E Supervisor</u>
Signature: 	Date: <u>10/15/2019</u>
email: <u>Kyle_Littrell@xtoenergy.com</u>	Telephone: <u>432-221-7331</u>
<b><u>OCD Only</u></b>  Received by: _____ Date: _____	

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## 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>&gt;100</u> (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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

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Printed Name: Garrett Green Title: SSHE CoordinatorSignature:  Date: 6/28/2023email: garrett.green@exxonmobil.com Telephone: (575)-200-0729**OCD Only**Received by: Shelly Wells Date: 6/29/2023

Form C-141

State of New Mexico  
Oil Conservation Division

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## Remediation Plan

**Remediation Plan Checklist:** *Each of the following items must be included in the plan.*

- ☒ Detailed description of proposed remediation technique
- ☒ Scaled sitemap with GPS coordinates showing delineation points
- ☒ Estimated volume of material to be remediated
- ☒ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☒ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

**Deferral Requests Only:** *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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: Garrett GreenTitle: SSHE CoordinatorSignature: Date: 6-28-2023email: garrett.green@exxonmobil.comTelephone: 575-200-0729**OCD Only**Received by: Shelly WellsDate: 6/29/2023

☒ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: Date: 6/30/2023



June 28, 2023

New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

**Re: Remediation Work Plan  
Poker Lake Unit 301H  
Incident Number nAB1507941546  
Eddy County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of XTO Energy, Inc. (XTO), has prepared the following *Remediation Work Plan (Work Plan)* as a follow up to the *Closure Request* dated October 16, 2019. This *Work Plan* proposes to complete additional depth to groundwater determination activities at the Poker Lake Unit 301H (Site) in response to the New Mexico Oil Conservation Division (NMOCD) denial of the October 16, 2019, *Closure Request*. In the denial, NMOCD expressed concern that depth to groundwater was not adequately determined. The following *Work Plan* proposes to install a soil boring within 0.5 miles of the Site to investigate depth to groundwater and confirm the Closure Criteria at the Site.

#### **SITE DESCRIPTION AND RELEASE SUMMARY**

The Site is located in Unit F, Section 27, Township 24 South, Range 30 East, in Eddy County, New Mexico (32.189307°, -103.870133°) and is associated with oil and gas exploration and production operations on Federal land managed by the Bureau of Land Management (BLM).

On March 16, 2015, the stuffing box packing failed, and the E-pot designed to shut down the well and control the fluids failed to properly operate. As a result, approximately 13 barrels (bbls) of crude oil and 13 bbls of produced water were released. The release impacted approximately 9,537 square feet of caliche well pad and misted approximately 15,000 square feet of well pad and 9,000 square feet of pasture north of the pad. A vacuum truck recovered approximately 3 bbls of crude oil and 2 bbls of produced water and the saturated surface soil was scraped and removed for disposal. The former operator reported the release to the NMOCD on a Release Notification and Corrective Action Form C-141 (Form C-141) on March 19, 2015. The release was assigned Remediation Permit (RP) Number 2RP-2900 and Incident Number nAB1507941546.

The release was included in the Compliance Agreement for Remediation for Historical Releases (Compliance Agreement) between XTO and the NMOCD effective November 13, 2018. The purpose of the Compliance Agreement was to ensure that reportable releases that occurred prior to August 14, 2018, where XTO is responsible for the corrective action, comply with Title 19, Chapter 15, Part 29 (19.15.29) of the New Mexico Administrative Code (NMAC) as amended on August 14, 2018.



XTO Energy, Inc  
Remediation Work Plan  
Poker Lake Unit 301H

## BACKGROUND

The October 16, 2019, Closure Request detailed site characterization according to Table I, Closure Criteria for Soils Impacted by a Release, of 19.15.29 NMAC. Results from the characterization desktop review are presented on page 3 of the Form C-141, Site Assessment/Characterization. Potential Site receptors are identified on Figure 1.

Based on the results of the Site Characterization, the following NMOCD Table I Closure Criteria (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
- TPH: 2,500 mg/kg
- Chloride: 20,000 mg/kg

Between April 2018 and June 2019, delineation and excavation activities were conducted at the Site to address the impacted soil resulting from the March 16, 2015, crude oil and produced water release. Closure was requested on October 16, 2019, based on laboratory analytical results for the excavation and delineation soil samples indicating benzene, BTEX, GRO/DRO, TPH, and chloride concentrations were compliant with the Site Closure Criteria. Additional details regarding the delineation and excavation activities can be referenced in the October 16, 2019, *Closure Request*.

On March 23, 2023, NMOCD denied the *Closure Request* for Incident Number nAB1507941546 for following reason:

- *The depth to groundwater has not been adequately determined. 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 in the submission. The responsible party may choose to remediate to the most stringent levels listed in Table 1 of 19.15.29 NMAC in lieu of drilling to determine the depth to groundwater.*

## PROPOSED REMEDIATION WORKPLAN

In order to confirm depth to groundwater is greater than 100 feet bgs at the Site, XTO proposes to advance a soil boring to a depth of 105 feet bgs within 0.5 miles of the Site. A field geologist will log and describe soils continuously. The soil boring will be left open for over 72 hours to allow for equilibration of groundwater levels within the temporary boring casing. After the 72-hour waiting period, depth to groundwater will be assessed and the soil boring will be backfilled following New Mexico Office of the State Engineer (NMOSE) approved procedures. A well record or soil boring log will be included in the follow up Closure Report.

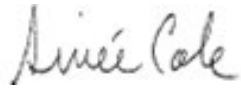
XTO will complete the soil boring within 90 days of the date of approval of this *Work Plan* by the NMOCD and submit a *Closure Request Addendum* within 30 days of completing the soil boring. XTO believes this *Work Plan* is protective of human health, the environment, and groundwater and respectfully requests approval of this *Work Plan* for Incident Number nAB1507941546.



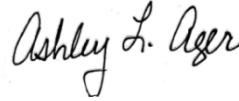
XTO Energy, Inc  
Remediation Work Plan  
Poker Lake Unit 301H

If you have any questions or comments, please contact Ms. Tacoma Morrissey at (337) 257-8307 or [tmorrissey@ensolum.com](mailto:tmorrissey@ensolum.com).

Sincerely,  
**Ensolum, LLC**



Aimee Cole  
Senior Managing Scientist



Ashley Ager, P.G.  
Program Director

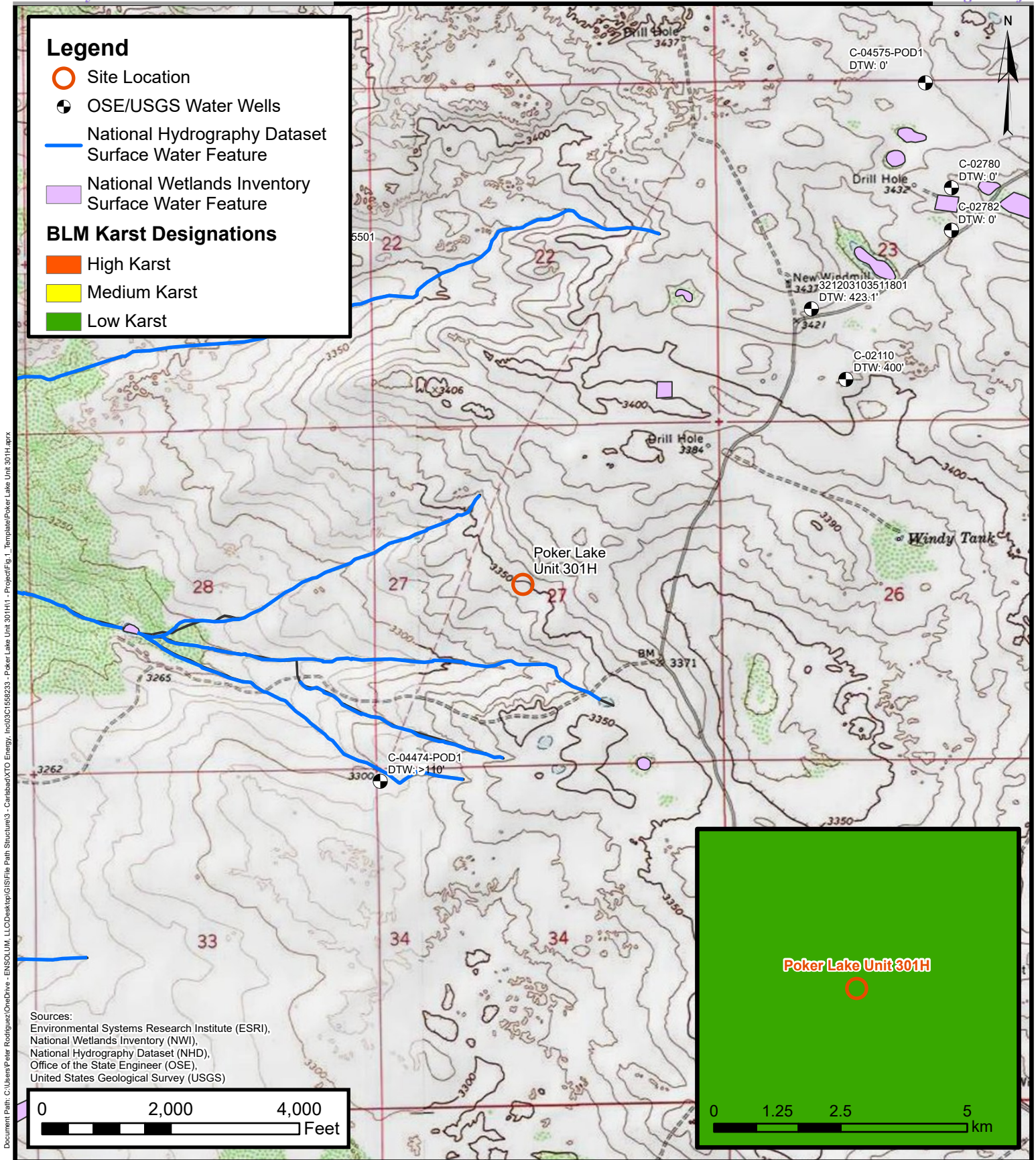
cc: Garrett Green, XTO  
Shelby Pennington, XTO  
Bureau of Land Management

Appendices:

Figure 1 Site Receptor Map



FIGURES



## Site Receptor Map

XTO Energy, Inc  
 Poker Lake Unit 301H  
 Incident Number: NAB1507941546  
 Unit F, Section 27, T24S, R30E  
 Eddy County, New Mexico

FIGURE  
 1

**ENSOLUM**  
 Environmental, Engineering and  
 Hydrogeologic Consultants

**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 234382

CONDITIONS

Operator:  XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:  5380
	Action Number:  234382
	Action Type:  [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	None	6/30/2023