



August 29, 2025

**New Mexico Oil Conservation Division**

New Mexico Energy, Minerals, and Natural Resources Department  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

**Re: Closure Request  
PLU ROW 2 West Recycle Facility  
Incident Numbers nAPP2515449981 & nAPP2520944364  
Eddy County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of XTO Energy, Inc (XTO), has prepared this *Closure Request* to document the findings of a liner integrity inspection conducted at the PLU ROW 2 West Recycle Facility (Site) following a release of produced water within a lined containment. Based on the liner integrity inspection activities, XTO is submitting this *Closure Request*, describing the inspection results and requesting closure for Incident Numbers nAPP2515449981 & nAPP2520944364.

**SITE DESCRIPTION AND RELEASE SUMMARY**

The Site is located in Unit P, Section 17, Township 24 South, Range 30 East, in Eddy County, New Mexico (32.2115986°, -103.8967596°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM).

On June 2, 2025, failure of a valve resulted in the release of approximately 21 barrels (bbls) of produced water into a lined containment. A vacuum truck was dispatched to the Site to recover free-standing fluids and all fluids were recovered. The lined containment was power washed to remove any residual fluids. XTO reported the release to the New Mexico Oil Conservation Division (NMOCD) via a Notification of Release (NOR) and submitted an Initial C-141 Application (C-141) on June 3, 2025. The release was assigned Incident Number nAPP2515449981.

On July 25, 2025, failure of a level sensor resulted in the release of approximately 98 bbls of produced water into a lined containment. A vacuum truck was dispatched to the Site to recover free-standing fluids and all fluids were recovered. The lined containment was power washed to remove any residual fluids. XTO reported the release to the NMOCD via a NOR on July 28, 2025, and subsequently submitted a C-141 on August 21, 2025. The release was assigned Incident Number nAPP2520944364.

**SITE CHARACTERIZATION AND CLOSURE CRITERIA**

The Site was characterized to assess the applicability of Table I Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29 (19.15.29) of the New Mexico Administrative Code (NMAC).

XTO Energy, Inc  
Closure Request  
PLU ROW 2 West Recycle Facility

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Results from the characterization desktop review are presented below and potential Site receptors are identified on Figure 1.

Depth to groundwater at the Site is estimated to be greater than 100 feet below ground surface (bgs) based on a recent cathodic protection well. In August 2015, a cathodic well permitted by New Mexico Office of the State Engineer (C-3893) was completed approximately 0.74 miles southeast of the Site utilizing mud rotary drilling method. The well was drilled to a total depth of 600 feet bgs, and no groundwater was recorded. All wells used for depth to groundwater determination are presented on Figure 1. The Well Record and Log is included in Appendix A.

The closest continuously flowing or significant watercourse to the Site is a seasonal dry wash located approximately 2,000 feet southwest 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 (low potential karst designation area).

Based on the results of the Site Characterization, the following NMOCD Table I 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): 100 mg/kg
- Chloride: 600 mg/kg

## **LINER INTEGRITY INSPECTION ACTIVITIES**

A 48-hour advanced notice of the liner inspection was submitted to the NMOCD on August 25, 2025. The lined containment was cleaned of all debris and power washed and a liner integrity inspection was conducted by Ensolum personnel on August 27, 2025. The lined containment was inspected, and it was determined that the liner was operating as designed. The lined containment is stained and contained orange sandbags as weights but was properly cleaned prior to inspection allowing full view of the floor and walls. Upon inspection, no rips, tears, holes, or damage was observed. The liner was determined to be operating sufficiently, and all released fluids were recovered. Photographic documentation of the inspection is included in Appendix B.

## **CLOSURE REQUEST**

Liner integrity inspection activities were completed following the June 2025 and July 2025, releases of produced water within a lined containment at the Site. A liner integrity inspection was conducted on behalf of XTO, by Ensolum personnel on August 27, 2025. The results of the inspection indicated that the liner was operating as designed and the release was contained laterally by the lined containment walls. Based on initial response efforts and the liner operating as designed, XTO respectfully requests closure for Incident Numbers nAPP2515449981 & nAPP2520944364.

XTO Energy, Inc  
Closure Request  
PLU ROW 2 West Recycle Facility

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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**



Tracy Hillard  
Project Engineer



Tacoma Morrissey, M.S.  
Associate Principal

Cc: Colton Brown, XTO  
Kaylan Dirkx, XTO  
BLM

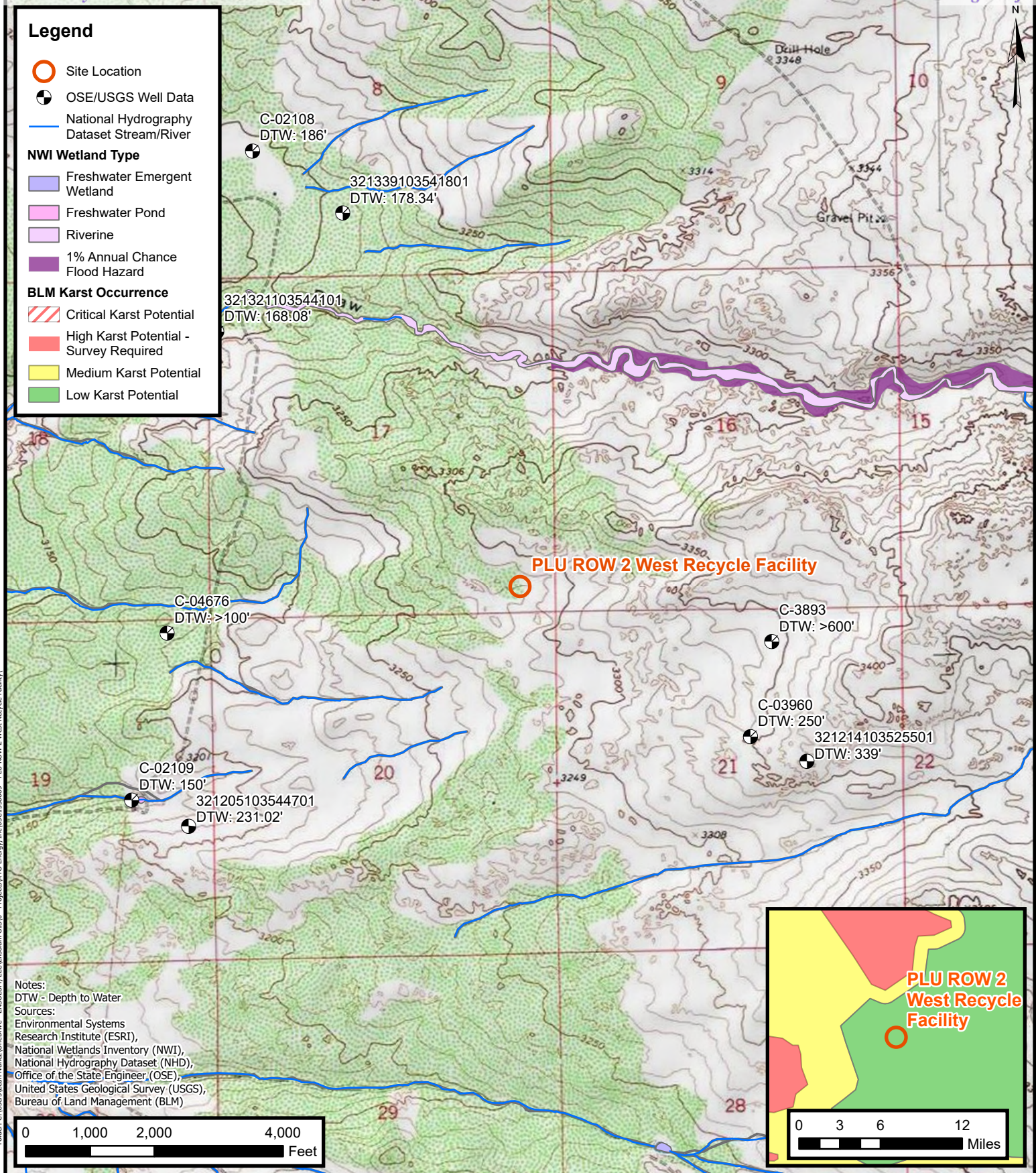
Appendices:

Figure 1	Site Receptor Map
Figure 2	Site Map
Appendix A	Well Record and Log
Appendix B	Photographic Log



FIGURES





## Site Receptor Map

XTO Energy, Inc  
 PLU ROW 2 West Recycle Facility  
 Incident Numbers: nAPP2515449981 and nAPP2520944364  
 Unit P, Section 17, T 24S, R 30E  
 Eddy County, New Mexico

FIGURE

1





## Site Map

XTO Energy, Inc  
PLU ROW 2 West Recycle Facility  
Incident Numbers: nAPP2515449981 and nAPP2520944364  
Unit P, Section 17, T 24S, R 30E  
Eddy County, New Mexico

**FIGURE**  
**2**



## APPENDIX A

### Referenced Well Records

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# WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

[www.ose.state.nm.us](http://www.ose.state.nm.us)

1. GENERAL AND WELL LOCATION	OSE POD NUMBER (WELL NUMBER) PLU Lease CP Bed				OSE FILE NUMBER(S) C-3893			
	WELL OWNER NAME(S) BOPCO, L.P.				PHONE (OPTIONAL)			
	WELL OWNER MAILING ADDRESS 201 MAIN STREET				CITY FORT WORTH		STATE TX	
					ZIP 76102			
	WELL LOCATION (FROM GPS)	DEGREES LATITUDE 32	MINUTES 12	SECONDS 32.88	N	* ACCURACY REQUIRED: ONE TENTH OF A SECOND		
	LONGITUDE 103	53	2.88	W	* DATUM REQUIRED: WGS 84			
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS - PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE SE 1/4 OF NW 1/4 OF NW 1/4 OF NE 1/4 OF SECTION 21, TOWNSHIP 24S, RANGE 30E								
2. DRILLING & CASING INFORMATION	LICENSE NUMBER WD-1261		NAME OF LICENSED DRILLER R. DARRELL CRASS			NAME OF WELL DRILLING COMPANY DARRELL CRASS DRILLING COMPANY		
	DRILLING STARTED 8/19/15		DRILLING ENDED 8/26/15		DEPTH OF COMPLETED WELL (FT) 600		BORE HOLE DEPTH (FT) 600	
							DEPTH WATER FIRST ENCOUNTERED (FT) N/A	
	COMPLETED WELL IS:		<input type="radio"/> ARTESIAN		<input checked="" type="radio"/> DRY HOLE		<input type="radio"/> SHALLOW (UNCONFINED)	
	DRILLING FLUID:		<input type="radio"/> AIR		<input checked="" type="radio"/> MUD		ADDITIVES - SPECIFY: SUPER GEL X	
	DRILLING METHOD:		<input checked="" type="radio"/> ROTARY		<input type="radio"/> HAMMER		<input type="radio"/> CABLE TOOL	
							OTHER - SPECIFY:	
	DEPTH (feet bgl)		BORE HOLE DIAM (inches)		CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)		CASING CONNECTION TYPE	
	FROM	TO						
	0	40	8"		SCH 40 PVC BLANK		GLUE, SCREWS	
3. ANNULAR MATERIAL	DEPTH (feet bgl)		BORE HOLE DIAM. (inches)		LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL		AMOUNT (cubic feet)	
	FROM	TO						
	10	425	8"		BENTONITE HOLE PLUG		145 CUBIC FEET	
	0	10	8"		PORTLAND CEMENT		7 CUBIC FEET	

FOR OSE INTERNAL USE

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

FILE NUMBER	C-3893	POD NUMBER	1	TRN NUMBER	571438
LOCATION	2-1-1 24S-20E-21				PAGE 1 OF 2



[illegible]

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

PAGE 2 OF 2



## APPENDIX B

### Photographic Log

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# Photographic Log

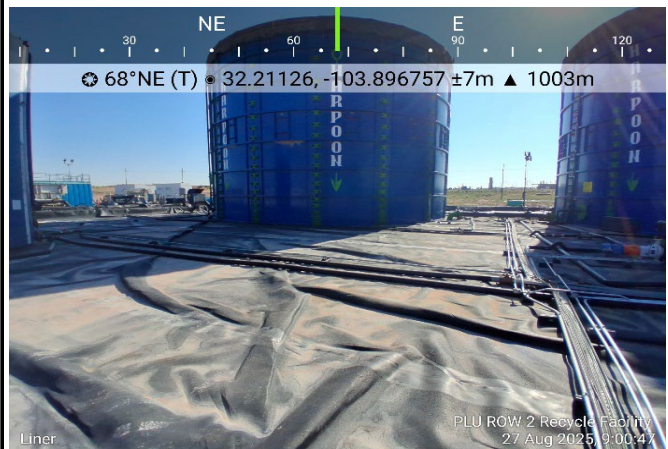
XTO Energy, Inc

PLU ROW 2 West Recycle Facility

nAPP2515449981 & nAPP2520944364



Photograph: 1 Date: 8/27/2025  
Description: Liner inspection activities  
View: Southeast



Photograph: 2 Date: 8/27/2025  
Description: Liner inspection activities  
View: East



Photograph: 3 Date: 8/27/2025  
Description: Liner inspection activities; bag weights  
View: North



Photograph: 4 Date: 8/27/2025  
Description: Liner inspection activities; bag weights  
View: Northeast





# Photographic Log

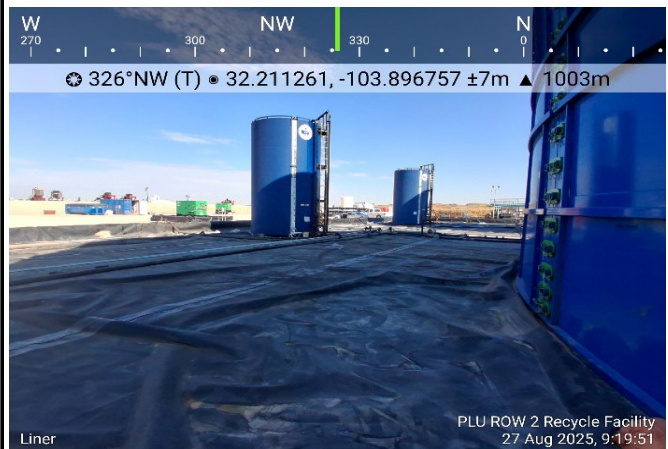
XTO Energy, Inc

PLU ROW 2 West Recycle Facility

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Photograph: 5 Date: 8/27/2025  
Description: Liner inspection activities  
View: East



Photograph: 6 Date: 8/27/2025  
Description: Liner inspection activities  
View: Northwest



Photograph: 7 Date: 8/27/2025  
Description: Liner inspection activities  
View: Southeast



Photograph: 8 Date: 8/27/2025  
Description: Liner inspection activities  
View: North



# Photographic Log

XTO Energy, Inc

PLU ROW 2 West Recycle Facility  
nAPP2515449981 & nAPP2520944364



Photograph: 9 Date: 8/27/2025  
Description: Liner inspection activities  
View: Northeast



Photograph: 10 Date: 8/27/2025  
Description: Liner inspection activities  
View: North



Photograph: 11 Date: 8/27/2025  
Description: Liner inspection activities  
View: Northeast



Photograph: 12 Date: 8/27/2025  
Description: Liner inspection activities  
View: South

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

General Information  
Phone: (505) 629-6116

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

QUESTIONS

Action 500881

**QUESTIONS**

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 500881
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Prerequisites</b>	
Incident ID (n#)	nAPP2515449981
Incident Name	NAPP2515449981 PLU ROW 2 WEST STATION @ FVV2507951055
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Facility	[FVV2507951055] PLU ROW 2 WEST FRAC POND

**Location of Release Source**

Please answer all the questions in this group.

Site Name	PLU ROW 2 WEST STATION
Date Release Discovered	06/02/2025
Surface Owner	Federal

**Incident Details**

Please answer all the questions in this group.

Incident Type	Produced Water Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

**Nature and Volume of Release**

Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.

Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Equipment Failure   Valve   Produced Water   Released: 21 BBL   Recovered: 21 BBL   Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.



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Action 500881

**QUESTIONS (continued)**

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**QUESTIONS**

<b>Nature and Volume of Release (continued)</b>	
Is this a gas only submission (i.e. only significant Mcf values reported)	<b>No, according to supplied volumes this does not appear to be a "gas only" report.</b>
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	<b>No</b>
Reasons why this would be considered a submission for a notification of a major release	<i>Unavailable.</i>
<i>With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.</i>	

**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	<b>True</b>
The impacted area has been secured to protect human health and the environment	<b>True</b>
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	<b>True</b>
All free liquids and recoverable materials have been removed and managed appropriately	<b>True</b>
If all the actions described above have not been undertaken, explain why	<i>Not answered.</i>

*Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.*

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

I hereby agree and sign off to the above statement	Name: Colton Brown Title: Environmental Advisor Email: colton.s.brown@exxonmobil.com Date: 06/03/2025
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QUESTIONS, Page 3

Action 500881

**QUESTIONS (continued)**

Operator:  XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:
	5380
	Action Number:
	500881
Action Type:	
[C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

**QUESTIONS**

<b>Site Characterization</b>	
<i>Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Between 1000 (ft.) and ½ (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between ½ and 1 (mi.)
Any other fresh water well or spring	Between ½ and 1 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1000 (ft.) and ½ (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Between 1 and 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Between ½ and 1 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

<b>Remediation Plan</b>	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	06/02/2025
On what date will (or did) the final sampling or liner inspection occur	08/27/2025
On what date will (or was) the remediation complete(d)	08/27/2025
What is the estimated surface area (in square feet) that will be remediated	18998
What is the estimated volume (in cubic yards) that will be remediated	0
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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Action 500881

**QUESTIONS (continued)**

Operator:  XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 500881
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Remediation Plan (continued)</b>	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
<b>This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:</b>	
<i>(Select all answers below that apply.)</i>	
Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	No
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
I hereby agree and sign off to the above statement	Name: Ashley McAfee Email: <a href="mailto:ashley.a.mcafee@exxonmobil.com">ashley.a.mcafee@exxonmobil.com</a> Date: 09/01/2025
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	



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Action 500881

**QUESTIONS (continued)**

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 500881
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	498725
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	08/27/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	18998

**Remediation Closure Request**

*Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.*

Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	18998
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	Liner integrity inspection activities were completed following the June 2025 and July 2025, releases of produced water within a lined containment at the Site. A liner integrity inspection was conducted on behalf of XTO, by Ensolum personnel on August 27, 2025. The results of the inspection indicated that the liner was operating as designed and the release was contained laterally by the lined containment walls. Based on initial response efforts and the liner operating as designed, XTO respectfully requests closure for Incident Numbers nAPP2515449981 & nAPP2520944364.

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

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

I hereby agree and sign off to the above statement	Name: Ashley McAfee Email: <a href="mailto:ashley.a.mcafee@exxonmobil.com">ashley.a.mcafee@exxonmobil.com</a> Date: 09/01/2025
--	--

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CONDITIONS

Action 500881

CONDITIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 500881
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
scwells	None	9/5/2025