



October 6, 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: Deferral Request  
BEU DI 29 Pad  
Incident Number nAPP2434828618  
Lea County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of XTO Energy, Inc. (XTO), has prepared the following *Deferral Request* for the BEU DI 29 Pad (Site). This *Deferral Request* includes the additional information requested in a denial by the New Mexico Oil Conservation Division (NMOCD) of a previously submitted Deferral Request, submitted on March 10, 2025. In the denial, NMOCD expressed concern that the potential medium potential karst designation of the Site posed an imminent risk to groundwater. As such, NMOCD requested a karst survey and an evaluation of the soil type and review of safe excavation distances. XTO is providing the additional information requested by NMOCD and, after evaluation of that information, requesting no further action for Incident Number nAPP2434828618.

**BACKGROUND**

The Site is located in Unit D, Section 21, Township 20 South, Range 32 East, in Lea County, New Mexico (32.564955°, -103.778164°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management. It was originally reported as being associated with State Land managed by the New Mexico State Land Office (SLO) but after further review of available land access maps, it was confirmed to be located on Federal Land.

On December 10, 2024, failure of a dump valve resulted in the release of 8 barrels (bbls) of produced water and 1 bbl of crude oil into a lined containment and released overspray on and between active production structures, engineered facility equipment, and onto the surface of the well pad. A vacuum truck was immediately dispatched to the Site to recover free-standing fluids; 8 bbls of produced water were recovered. XTO reported the release to the New Mexico Oil Conservation Division (NMOCD) via Notification of Release (NOR) on December 13, 2024 and subsequently submitted an Initial C-141 Application (C-141) on December 17, 2024. The release was assigned Incident Number nAPP2434828618.

As documented in the March 10, 2025 Deferral Request report, impacted soil was surface scraped from the release area as indicated by visibly stained soil. A total of approximately 16 cubic yards of impacted soil was removed during the excavation activities. The impacted soil was transported and properly disposed of at the R360 Halfway Disposal and Landfill in Hobbs, New Mexico. Following removal of impacted soil to the maximum extent practicable (MEP), Ensolum personnel collected 5-point composite

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soil samples representing no more than 200 square feet from the accessible areas from the release. Eight confirmation soil samples, CS01 through CS08, were collected from a depth of 0.5 feet below ground surface (bgs) from within the release extent. Laboratory analytical results for confirmation soil samples CS01 through CS03, and CS06 indicated all contaminants of concern (COCs) were in compliance with Closure Criteria. Confirmation soil samples CS04, CS05, CS07, and CS08 indicated Total Petroleum Hydrocarbons (TPH) and/or chloride concentrations exceeded Closure Criteria. Lateral delineation of the residual impacted soil was defined by delineation soil samples SS01 through SS07. Vertical delineation of residual impacted soil was defined by delineation soil samples BH01 and BH02 at 1-foot bgs. An estimated area of impacted soil left in place immediately adjacent to or below active production equipment measured approximately 1,640 square feet and a total of approximately 61 cubic yards of impacted soil remained in place.

On April 7, 2025, NMOCD denied the March 10, 2025, Deferral Request report for the following reasons:

*This site is located in a medium karst potential occurrence zone and OCD has recently reevaluated karst potential zones and will not approve deferrals in these areas as medium karst may cause an imminent risk to groundwater. The operator may choose to have karst surveys performed, by a BLM approved karst/cave contractor, in order to determine if karst features are present at the site. A desktop survey, aerial/pedestrian survey, AND a geophysical survey must be performed. If no karst features are located during any of the surveys AND the geophysical survey shows no other indications of unstable ground, the closure criteria can be based on Table I Closure criteria found in 19.15.29 NMAC. Sites located on BLM or State Land Office (SLO) owned surface will need surface owner approval.*

*In addition, a certified civil engineer will need to evaluate the soil type and provide the minimum distance the excavation(s) needs to be from the equipment and how deep the excavation(s) can be prior to requesting a deferral. This document must be stamped by the engineer.*

*The deferral area needs to be vertically delineated within the area where the highest contamination remains prior to a deferral approval.*

*Under the Site Characterization portion of the C-141 application, update the minimum distance to any other significant watercourse—it should be ½-1 mile (west).*

*Remediation summary and Figure 2 call it BH02 whereas Table 1 and Laboratory report calls it BH03. Update everything to reflect the correct name.*

*A remediation closure report or updated deferral request is due to the OCD by 7/7/25*

Based on NMOCDs response, an engineering review, a karst survey coordination, and additional remediation activities were warranted.

## ENGINEERING REVIEW

The Site was assessed by a person trained in Occupational Safety and Health Administration (OSHA) excavation and trench safety (Competent Person) under the consultation of a Registered Professional Engineer (RPE) licensed in the State of New Mexico. Soil type B was observed in the inaccessible area, a 66-foot by 36-foot section directly adjacent to and beneath active production equipment. Immediately adjacent to the deferred soil is an engineered lined containment and an engineered pipe rack.

Based on the Site conditions and following OSHA Excavation Standards, the RPE recommendation indicates excavation should not be completed within 2 feet of the edge of the lined containment, within

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15.5 feet from the edge of the tanks within the lined containment, within 30 feet from the center of the 6-foot pipe rack footing, or within 20 feet from the center of the 4-foot pipe rack footing. As such, the surface scrape extent completed to date, originally presented in the March 2025 Deferral Request, based on the engineering calculations, the excavation should not be extended closer to the equipment or made deeper while maintaining the safety of all onsite personnel and the structural integrity of the active production equipment as determined by the RPE.

A detailed description of the review and calculations is included in the *Excavation Guidance Document* in Appendix A. The *Excavation Guidance Document* is stamped by an RPE licensed in the state of New Mexico.

## KARST SURVEY RESULTS

Southwest Geophysical Consulting, a BLM-approved third-party cave/karst contractor, conducted a desktop survey, aerial survey, and geophysical survey of the Site. In summary, no surface karst features within the 200-foot survey area surrounding the release extent were identified in the desktop or surface karst surveys. Results of the geophysical study indicated stable ground with no anomalies in the data, that would be consistent with air-filled subsurface voids or a pathway to groundwater.

The detailed Karst Survey report provided by Southwest Geophysical Consulting is included in Appendix B.

## ADDITIONAL DELINEATION ACTIVITIES

On October 2, 2025, Ensolum personnel returned to the Site to conduct delineation activities. One additional borehole, BH03, was advanced via hand auger to a terminal depth of 2 feet bgs in the vicinity of confirmation soil sample CS05. Discrete delineation soil samples were collected from the borehole at depths of 0.5 feet, 1-foot, and 2 feet bgs. The delineation soil samples were field screened for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID) and chloride utilizing Hach® chloride QuanTab® test strips. Field screening results and observations of the soil samples collected from the borehole were logged on a lithologic/soil sampling log, which is included in Appendix C. The delineation soil sample locations were mapped utilizing a handheld Global Positioning System (GPS) unit and are depicted on Figure 1. Photographic documentation of all site activities are included in Appendix D.

The soil samples were placed directly into pre-cleaned glass jars, labeled with the Site location, date, time, sampler name, method of analysis, and immediately placed on ice. The soil samples were transported under strict chain-of-custody procedures to Cardinal Laboratories (Cardinal) in Hobbs, New Mexico, or Eurofins Laboratory (Eurofins) in Carlsbad, New Mexico, for analysis of the following COCs: 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 Standard Method SM4500 or EPA Method 300.0.

## LABORATORY ANALYTICAL RESULTS

Laboratory analytical results for the delineation soil samples collected in BH03 indicated all COCs were in compliance with the Site Closure Criteria, successfully confirming the vertical extent of the requested area of deferral. Laboratory analytical results are summarized in Table 1. Laboratory analytical reports for BH03 and the updated laboratory analytical report needed for samples collected in BH02 are included in Appendix E.

XTO Energy, Inc  
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## DEFERRAL REQUEST

Following the NMOCDs comments from the March 2025 Deferral Report denial, further investigation at the Site was conducted that included an engineering review, a karst survey, and additional delineation activities. The March 2025 Deferral Request report is provided in Appendix F.

XTO has removed soil to the MEP, with further progress restricted by challenging soil conditions that are prone to collapse and nearby active production equipment. The recommendations in the *Excavation Guidance Document* restrict further ground disturbance near production equipment, and XTO believes it is unsafe to remove any further impacted soil without a major facility reconstruction.

The results of the karst survey confirm there is no imminent risk to groundwater at the Site based on the absence of any visible karst features through desktop and pedestrian surveys, and the absence of any anomalies through the geophysical survey that would otherwise indicate potential subsurface voids. The absence of karst features beneath the Site indicates the subsurface is stable and there is no imminent threat to human health, the environment, or groundwater, which eliminates the sensitive receptor as it relates to the Site.

Laboratory analytical results for the delineation soil samples collected in BH03 indicated all COCs were in compliance with the strictest Table I Closure Criteria, successfully confirming the vertical extent of the requested area of deferral. As such, based on removal of impacted soil to the MEP, and full delineation of the release to the Site Closure Criteria, XTO requests deferral of final remediation for Incident Number nAPP2434828618 until final reclamation of the well pad or major construction, whichever comes first.

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 Manager



Benjamin J. Belill  
Senior Geologist

cc: Robert Woodall, XTO  
Richard Kotzur, XTO  
BLM

### Appendices:

Figure 1	Requested Area of Deferral
Table 1	Soil Sample Analytical Results
Appendix A	Excavation Guidance Document
Appendix B	Environmental Karst Study Report
Appendix C	Lithologic Soil Sampling Logs

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BEU DI 29 Pad

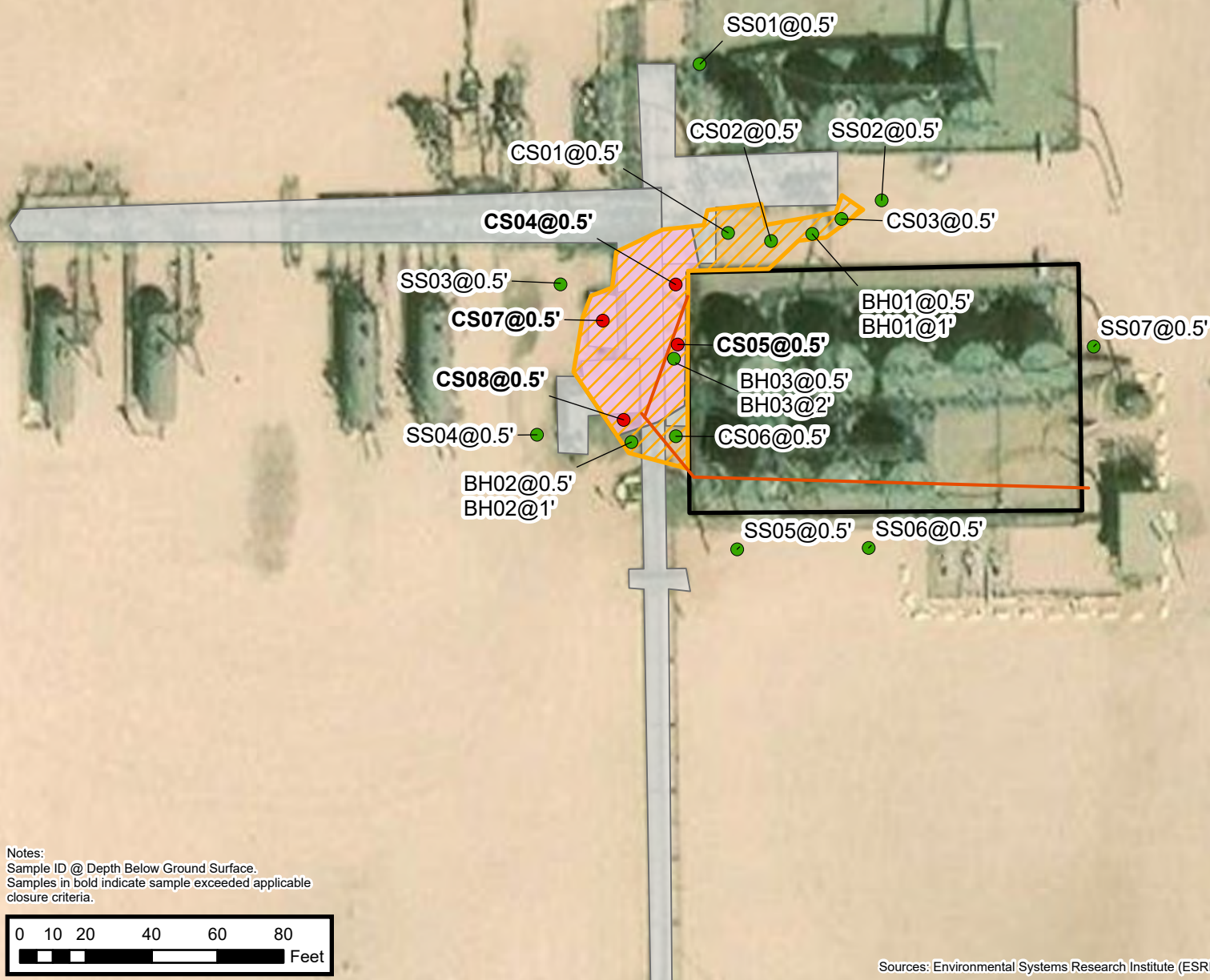
Appendix D Photographic Log  
Appendix E Laboratory Analytical Reports & Chain-of-Custody Documentation  
Appendix F March 10, 2025 Deferral Request Report



FIGURES

**Legend**

- Soil Samples in Compliance with Closure Criteria
- Confirmation Soil Samples Not in Compliance with Closure Criteria
- Electric Utility Line
- ▨ Release Extent
- ▭ Liner Containment Area
- ▭ Requested Area of Deferral
- ▭ Production Equipment

**Requested Area of Deferral**

XTO Energy, Inc  
 BEU DI 29 Pad  
 Incident Number: nAPP2434828618  
 Unit D, Section 21, T 20S, R 32E  
 Lea County, New Mexico

**FIGURE**  
**1**



TABLES

**TABLE 1**  
**SOIL SAMPLE ANALYTICAL RESULTS**  
**BEU DI 29 PAD**  
**XTO Energy, Inc**  
**Lea County, New Mexico**

Sample I.D.	Sample Date	Sample Depth (feet bgs)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)	TPH ORO (mg/kg)	GRO+DRO (mg/kg)	Total TPH (mg/kg)	Chloride (mg/kg)
NMOCD Table I Closure Criteria (NMAC 19.15.29)			10	50	NE	NE	NE	NE	100	600
<b>Delineation Soil Samples</b>										
SS01	02/27/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	336
SS02	02/27/2025	0.5	<0.050	<0.300	<10.0	12.7	<10.0	12.7	12.7	64.0
SS03	02/27/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	96.0
SS04	02/27/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	96.0
SS05	02/27/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	80.0
SS06	02/27/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	96.0
SS07	02/27/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	224
BH01	02/26/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	112
BH01	02/26/2025	1	<0.050	<0.300	<10.0	13.5	<10.0	13.5	13.5	96.0
BH02	02/26/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	160
BH02	02/26/2025	1	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	160
BH03	10/02/2025	0.5	<0.00200	<0.00399	<50.0	<50.0	<50.0	<50.0	<50.0	386
BH03	10/02/2025	2	<0.00201	<0.00402	<49.8	<49.8	<49.8	<49.8	<49.8	214
<b>Confirmation Soil Samples</b>										
CS01	02/26/2025	0.5	<0.050	<0.300	<10.0	22.8	<10.0	22.8	22.8	80.0
CS02	02/26/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	64.0
CS03	02/27/2025	0.5	<0.050	<0.300	<10.0	300	52.7	<10.0	<10.0	128
CS04	02/27/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	<b>5,040</b>
CS05	02/27/2025	0.5	<0.050	16.6	441	3,440	476	3,881	<b>4,357</b>	<b>992</b>
CS06	02/27/2025	0.5	<0.050	<0.300	<10.0	41.8	<10.0	41.8	41.8	208
CS07	02/27/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	<b>2,040</b>
CS08	02/27/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	<b>6,100</b>

## Notes:

bgs: below ground surface

mg/kg: milligrams per kilogram

NMOCD: New Mexico Oil Conservation Division

BTEX: Benzene, Toluene, Ethylbenzene, and Xylenes

Concentrations in **bold** exceed the NMOCD Table I Closure Criteria or reclamation requirement where applicable.

GRO: Gasoline Range Organics

DRO: Diesel Range Organics

ORO: Oil Range Organics

TPH: Total Petroleum Hydrocarbon

NMAC: New Mexico Administrative Code

Grey text indicates soil sample removed during excavation activities





## APPENDIX A

### Excavation Guidance Document

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October 3, 2025

**New Mexico Oil Conservation Division**

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

**Re: Excavation Guidance Document  
BEU DI 29 Pad  
Incident Number nAPP2434828618  
Lea County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum) has prepared this document on behalf of XTO Energy, Inc (XTO), to provide guidance on safety precautions related to the proposed excavation near existing production equipment. This guidance applies to the proposed excavation and applies only to the BEU DI 29 Pad (Site), for which a Site Map is attached as Figure 1.

This document has been prepared in accordance with the Occupational Safety and Health Administration (OSHA) Excavation Standard 29 Code of Federal Regulations (CFR) Part 1926 Sub-part P Section 1926.652(i) and 1926.652(j) and under the consultation of a Registered Professional Engineer (RPE). The document includes a review of the stability of adjacent structures and protection of employees from loose rocks, soil, and equipment and analysis of the following parameters:

- Soil types and conditions leading to cave-ins;
- Stability of engineered facility equipment with requested excavation;
- Protection of employees from materials and equipment that could fall or roll into an excavation; and
- Other hazardous conditions, including confined spaces.

This guidance document must be reviewed before starting any proposed excavation activities and kept on site if excavation activities are occurring. In addition, a copy of the OSHA Excavation Standard 29 CFR Part 1926 Sub-part P will be kept on site.

Review of OSHA Excavation Standards indicates the following guidance for general excavation activities:

- The walls of any excavated areas must be sloped to a maximum 1 horizontal to 1 vertical for Type B soils.
- OSHA Excavation Standard 29 CFR Part 1926 Sub-part P indicates the following:
  - Excavation below the level of the base or footing of any foundation or retaining wall poses a reasonable hazard to employees and should not be conducted without the removal of equipment adjacent to the proposed excavation and/or installation of physical safety measures such as shoring or other protective structures to prevent structural failure of the equipment foundation and to ensure safety to employees working near the proposed excavation.

XTO Energy, Inc  
Excavation Guidance Document  
BEU DI 29 Pad

- Employees shall be protected from excavated or other materials or equipment that could pose a hazard by falling or rolling into any excavation. Protection shall be provided by placing and keeping such materials or equipment at least two feet (.61 m) from the edge of excavations, or by the use of retaining devices that are sufficient to prevent materials or equipment from falling or rolling into excavations, or by a combination of both if necessary.
- When surcharge loads from stored material or equipment, operating equipment, or traffic are present, a Competent Person shall determine the degree to which the actual slope must be reduced below the maximum allowable slope and shall assure that such a reduction is achieved. Surcharge loads from adjacent structures shall be evaluated in accordance with § 1926.651(i).

## EXCAVATION ANALYSIS PARAMETERS

The following findings were observed at the Site:

- Soil type B was observed in the Site visit. Type B soil will be utilized for the recommendation. In the event of excavation activities, a competent person will inspect the site daily and note any changes in soil type. If type A or C soil is identified the excavation slope will be modified to account for this change.
- The area in question entails a polygon with maximum dimensions of 66 feet by 36 feet directly adjacent to and beneath production equipment as shown on Figure 2.
- Directly through the proposed excavation area are two engineered pipe racks containing multiple pipelines and electrical conduits measuring 6 feet wide by an undetermined length exceeding 10 times the width and 4 feet wide by an undetermined length exceeding 10 times the width. The pipe rack is supported by multiple C-channel footers.
- To the east of the proposed excavation area is an engineered lined containment containing multiple pipelines and large holding tanks. The lined containment measures 75 feet wide by 115 feet in length. The lined containment lays directly onto the pad surface. Eight large cylindrical tanks measuring 15.5 feet in diameter and 30 feet in height reside within the lined containment.
- On the western portion of the proposed excavation area are multiple electrical panels and controllers supported by two 3-inch square tubing extending into the subsurface at an unknown depth.
- To the north of the proposed excavation area is a staircase with a concrete base measuring 3 feet wide by 6 feet in length.

## ENGINEER RECOMMENDATIONS

Review of the above-mentioned parameters, OSHA regulations, and Site conditions observed during Site visits were completed and the following RPE recommendations were reached:

- Stress to the soil below the pipe rack structures can be estimated by the Boussinesq solution for infinitely long footing strip foundations assuming the underlain soil is homogenous and isotropic. Pictorials illustrating the Boussinesq solution lateral pressures and isobars are included in Appendix A. The maximum slope of 30 degrees and the beginning of the slope should be limited to beginning no less than 30 feet from the center of the 6-foot pipe rack footing and 20 feet from the center of the 4-foot pipe rack footing to prevent disruption of the stability of underlain soil.
- Stress to the soil below the lined containment structure can be estimated by the 2:1 Stress Distribution Model in the proposed excavation area in the areas adjacent to the lined containment. The beginning of the slope should be limited to beginning no less than 2 feet from the edge of the lined containment footing per above stated OSHA guidelines. No soil closer than

XTO Energy, Inc  
Excavation Guidance Document  
BEU DI 29 Pad

15.5 feet from the edge of the tanks should be disturbed based on Boussinesq stress isobars for circular footings.

- Due to the presence of production equipment and lined containment, excavation directly below any of the current lined containment area is not recommended and would require substantial deconstruction and/or additional support for equipment.
- Stress to the soil below the electrical panel structure can be estimated by the 2:1 Stress Distribution Model in the proposed excavation area. The beginning of the slope should be limited to beginning no less than 2 feet from the edge 4 inch square tubing footing per above stated OSHA guidelines.

## CONCLUSIONS

Based on the dimensions of the requested excavation and presence of adjacent structures, there is inadequate structure support to conduct excavation of the identified impacted soil in a manner that both protects personnel health and equipment stability.

Sincerely,

**Ensolum, LLC**

Brian Sulzberger, PE  
Senior Engineer



10/03/2025



cc: Colton Brown, XTO  
Kaylan Dirkx, XTO  
New Mexico State Land Office

Appendices:




Figure 1 Site Map  
Figure 2 Area of Interest Diagram  
Appendix A Engineering Models

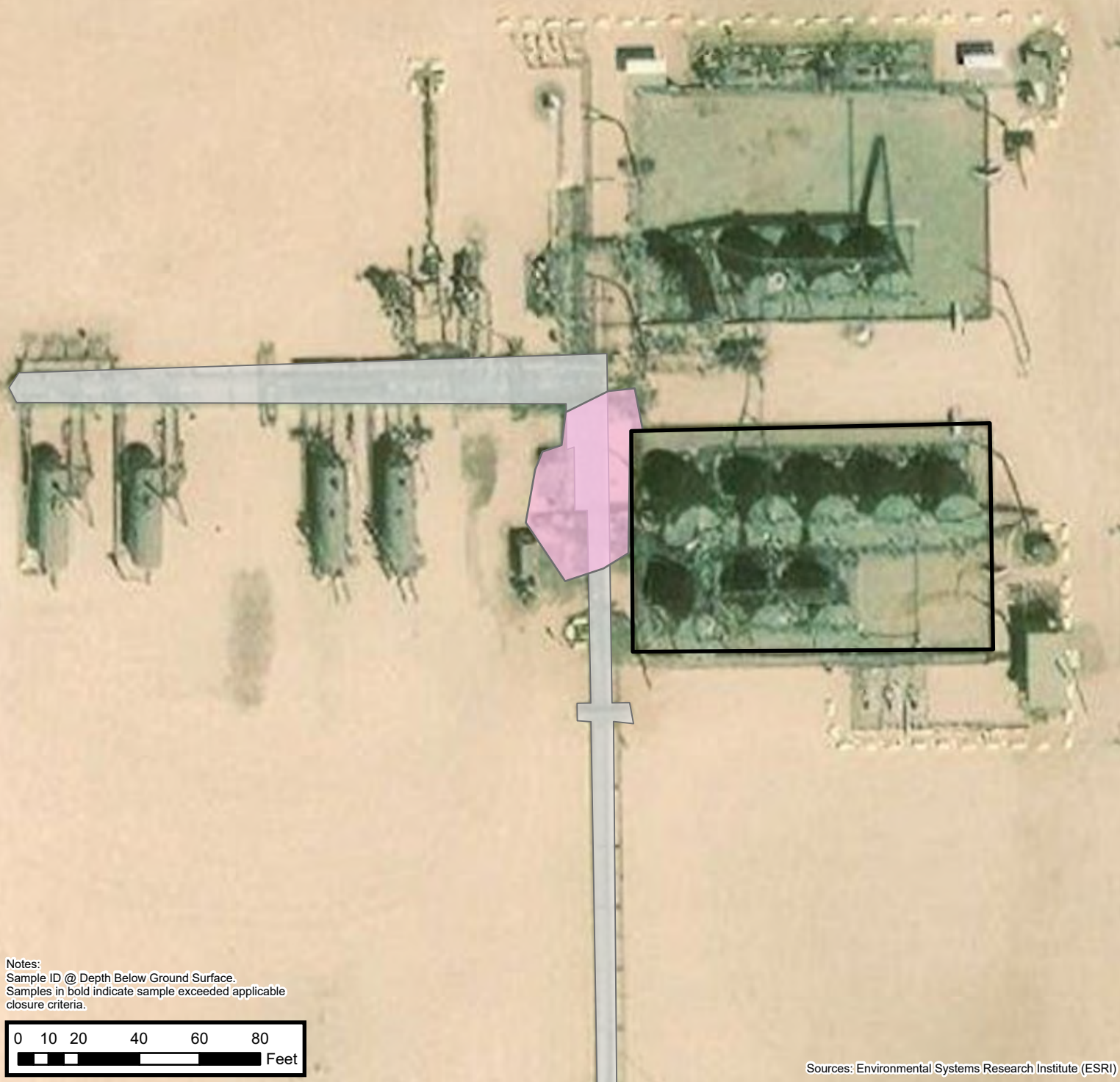


FIGURES



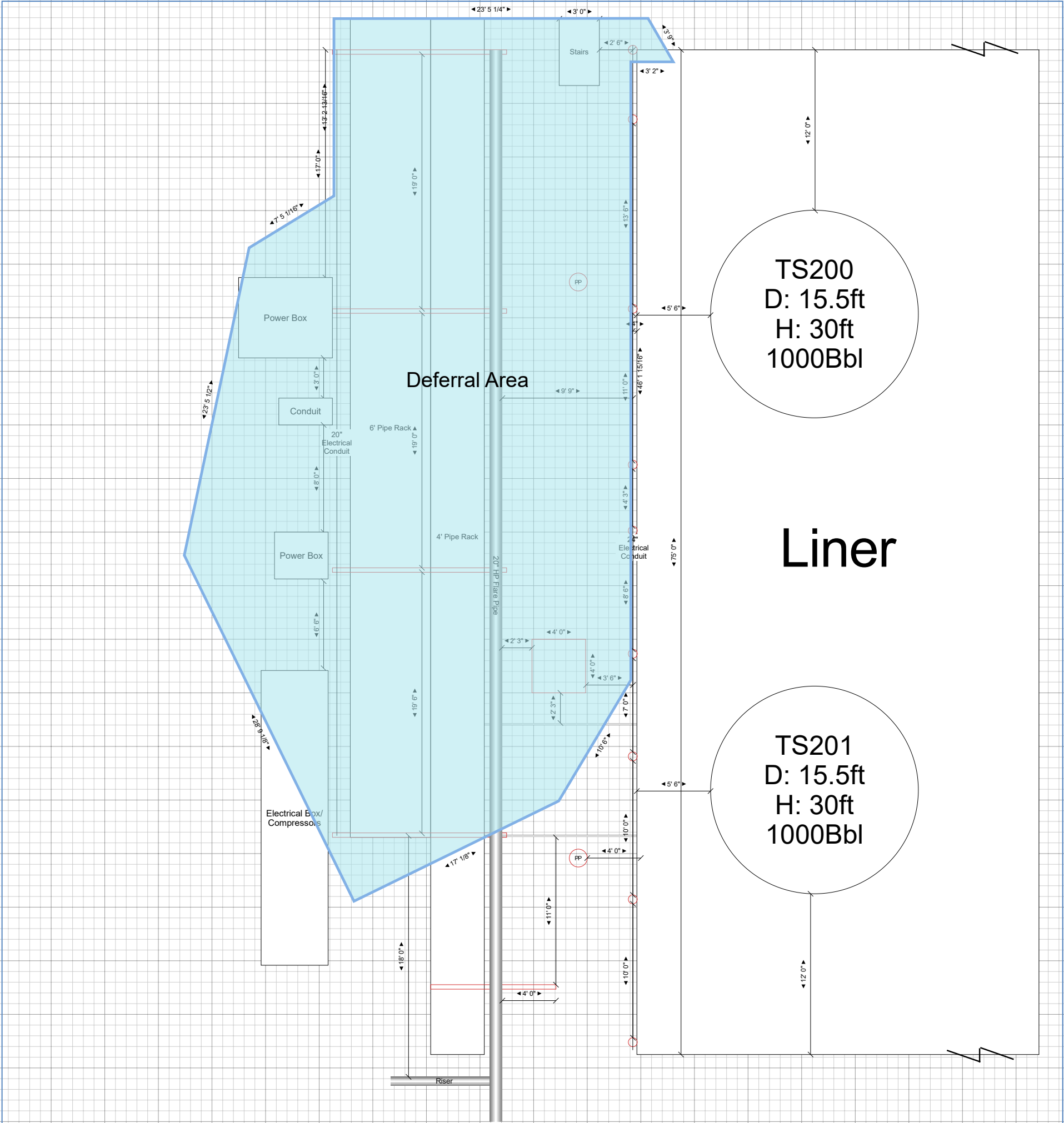
**Legend**

-  Liner Containment Area
-  Requested Area of Deferral
-  Production Equipment

**Site Map**

XTO Energy, Inc  
BEU DI 29 Pad  
Incident Number: nAPP2434828618  
Unit D, Section 21, T 20S, R 32E  
Lea County, New Mexico

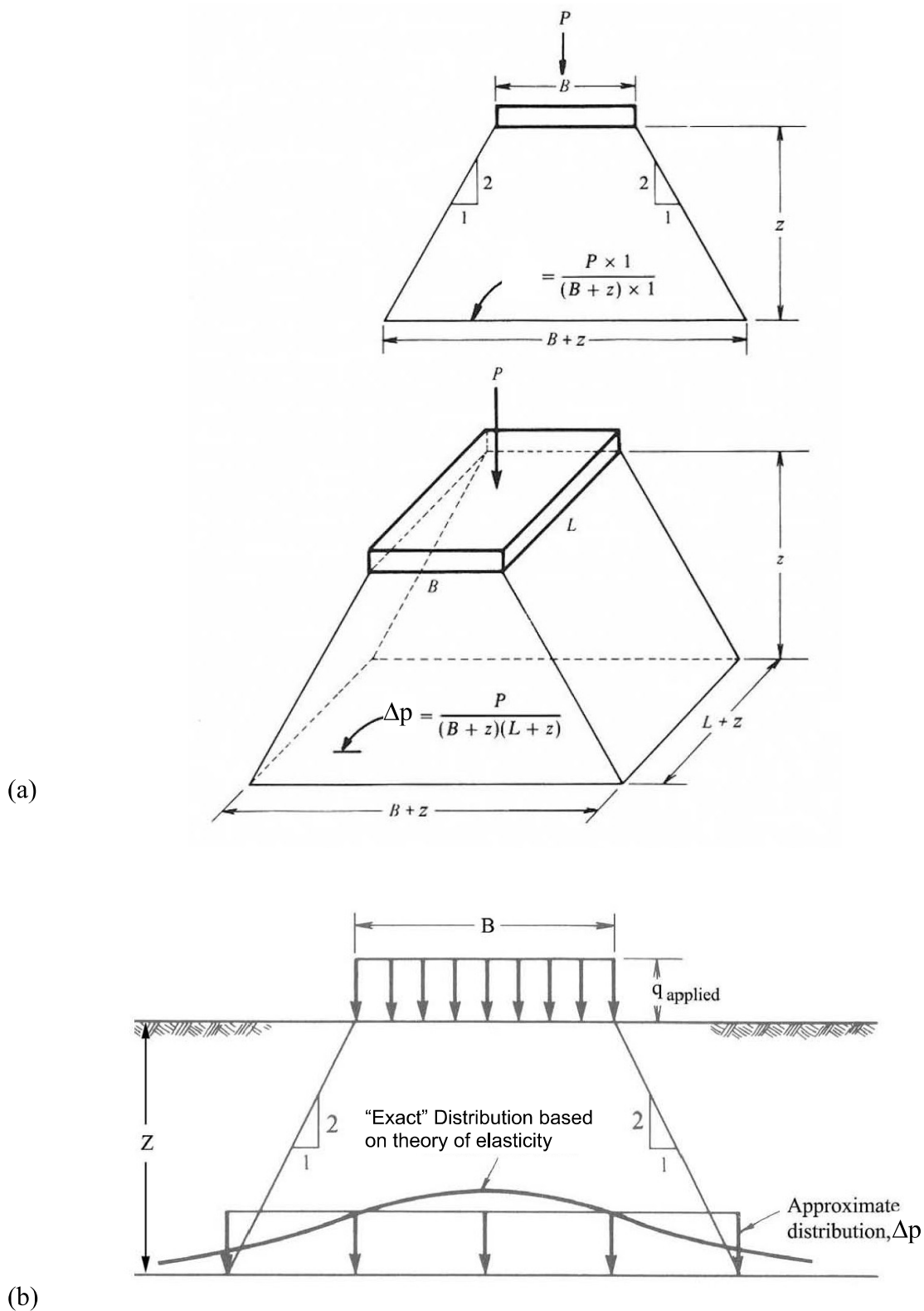
**FIGURE**  
**1**



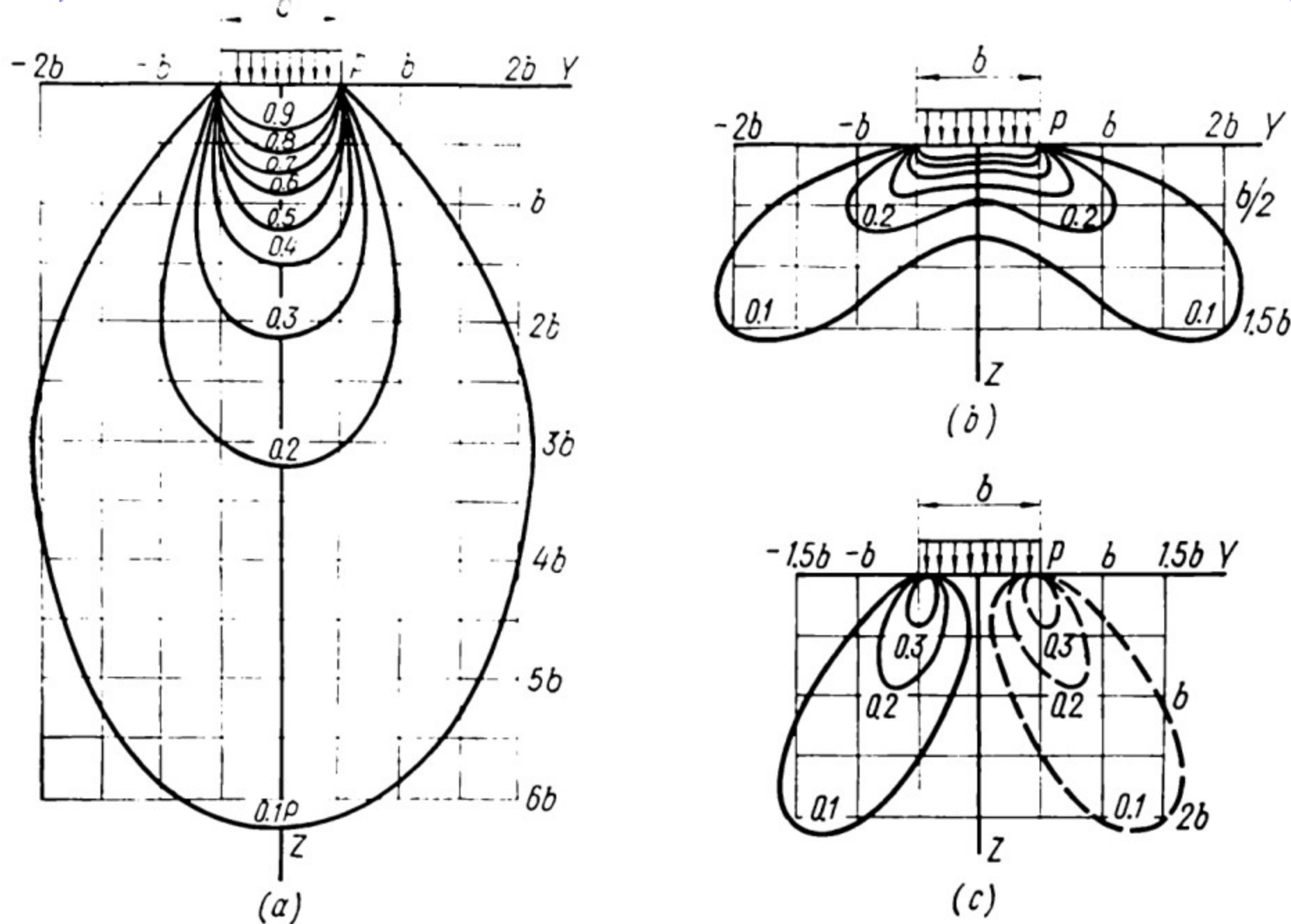
Site:	BEU DI 29 Rad	Drawing:	801506	Project:	03C1558655	Drawn:	Tracy Hillard	Notes:	Ensolum, LLC 3122 National Parks Hwy Carlsbad, NM 88220
Title:	Engineering Site Schematic	Scale:	1/4"=1'0"	Date:	07/9/2025	Rev:	A		



## Appendix A Engineering Models



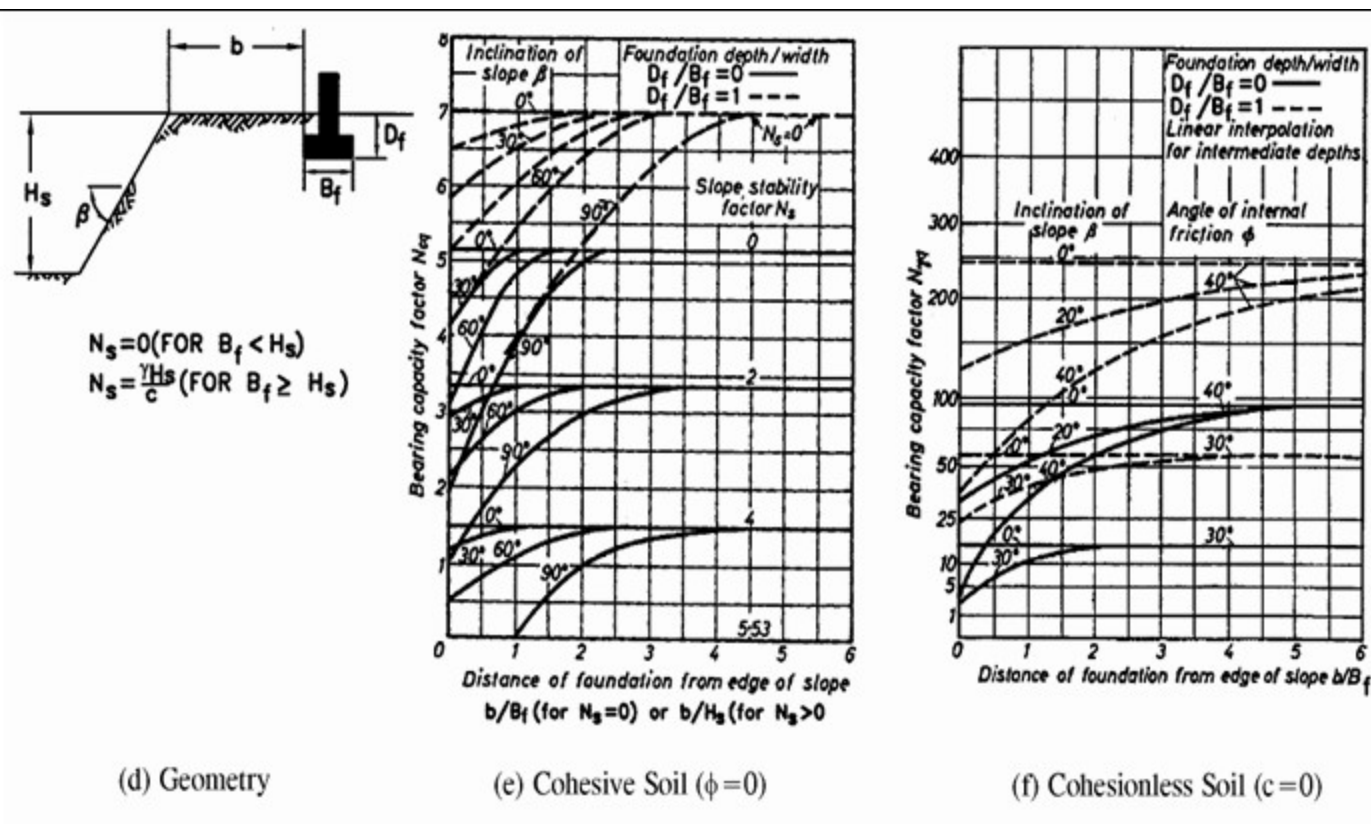
**Figure 2-10. Distribution of vertical stress by the 2:1 method (after Perloff and Baron, 1976).**



**Fig. 49. Lines of equal stresses in a linearly deformable massif for the planar problem**

(a) isobars  $\sigma_z$ ; (b) lateral pressure  $\sigma_y$ ; (c) shears  $\tau_{z,x}$





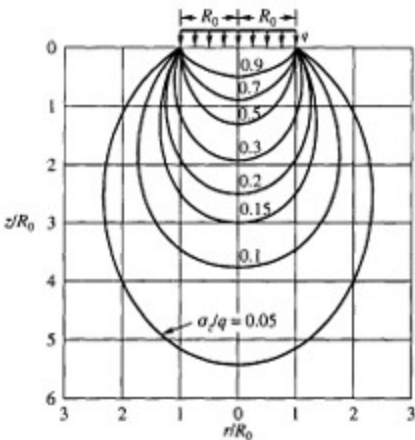


Figure 6.22 Pressure isobars based on Boussinesq equation for uniformly loaded circular footings

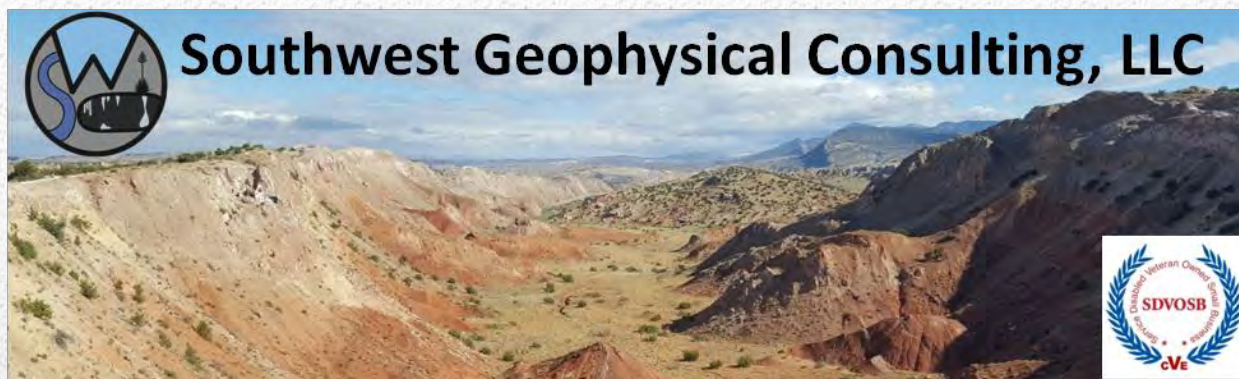


## APPENDIX B

### Environmental Karst Study Report

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# **Environmental Karst Study Report XTO Big Eddy Unit DI 29 Pad Lea County, New Mexico**

**Prepared For:  
Ensolum, LLC  
3122 National Parks Highway  
Carlsbad, NM 88220**

- ☐ Positive within 200 feet of spill delineation boundary
- ☒ Negative within 200 feet of spill delineation boundary
- ☒ Stable ☐ Unstable Ground
- ☐ Karst Monitor Recommended

**August 20, 2025**

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**MMXXV**



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## 1.0 INTRODUCTION

This report was commissioned by Ensolum, LLC (hereinafter referred to as "the client"), on June 9, 2025, for the purpose of conducting an environmental karst study within an area encompassing the XTO Big Eddy Unit DI 29 Pad project site (hereinafter termed "XB29") centered at N 32.565007° W 103.778515°.

### 1.1 Goals of this Study

The goals of this study are to conduct a surface karst inventory and provide the client with the location and description of any surface karst features located within 200 feet (61 meters) of the spill delineation boundary (as defined by 19.15.29.12 NMAC<sup>[1]</sup>), and to determine whether stable ground exists (as defined by 19.15.2 NMAC Definitions<sup>[2]</sup>) within the spill boundary of the XTO Big Eddy Unit DI 29 Pad project as provided by the client via e-mail (**XTO BEU DI 29 Pad.kmz**) on June 19, 2025, using electrical resistivity imaging<sup>[3]</sup>.

### 1.2 Summary of Findings

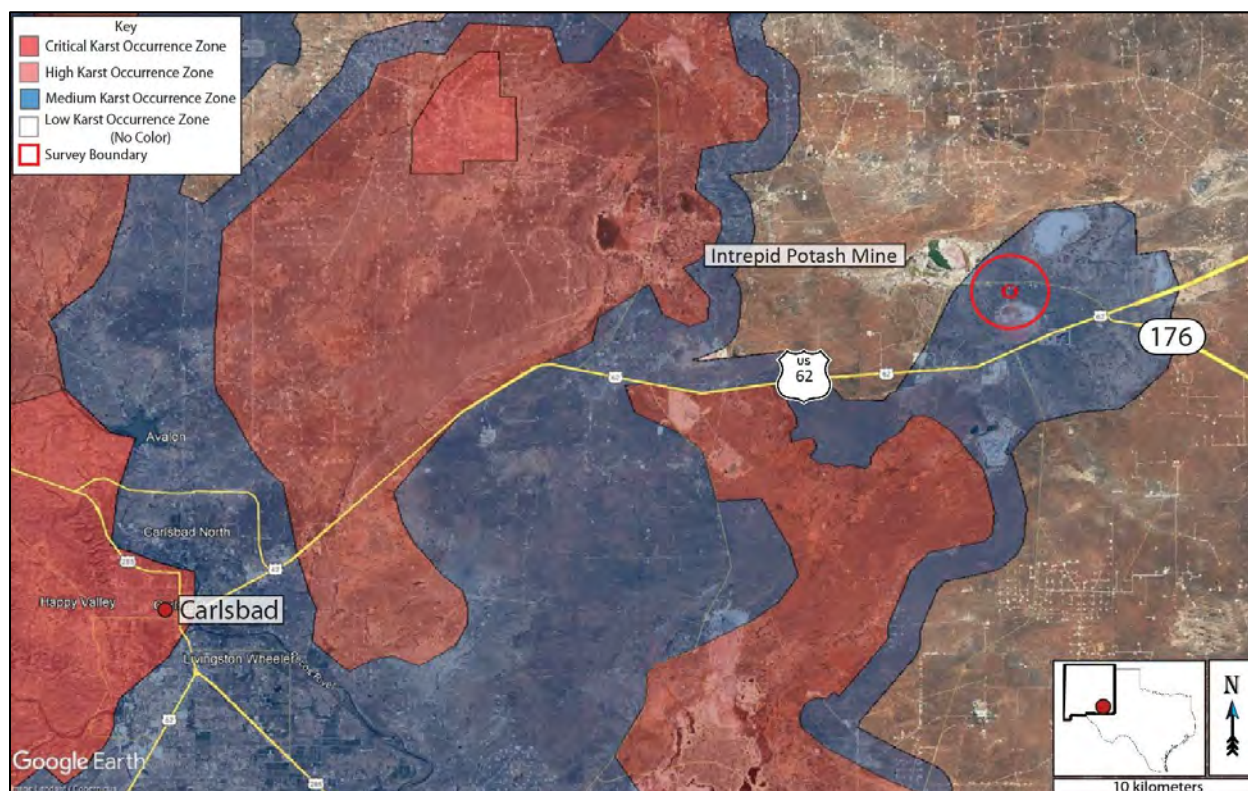
- **No surface karst features exist within the 200-foot (61-meter) perimeter of the spill delineation boundary.**
- **No anomalies consistent with subsurface air-filled voids were found within the XB29 resistivity survey area.**
- **Flat-lying stratigraphy is interpreted to exist beneath the area where the geophysical survey was conducted, indicating stable ground.**

### 1.3 Affected Environment

The XB29 project site is located in evaporite karst terrain, a landform that is characterized by underground drainage through solutionally enlarged conduits. Evaporite karst terrain may contain sinkholes, sinking streams, caves, and springs. Sinkholes leading to underground drainages and voids are common. These karst features, as well as occasional fissures and discontinuities in the bedrock, provide the primary sources for rapid recharge of the groundwater aquifers of the region. Additionally, karst may develop by hypogene processes involving dissolution by upwelling fluids from depth independent of recharge from the overlying or immediately adjacent surface. Hypogene karst systems may not be connected to the surface and can remain undiscovered unless encountered during drilling or excavation.

Karst features are delicate resources that are often of geological, hydrological, biological, and archeological importance, and should be protected. The four primary concerns in these types of terrain are environmental issues, worker safety, equipment damage, and infrastructure integrity.

The Bureau of Land Management (BLM) categorizes all areas within the Carlsbad Field Office (CFO) zone of responsibility as having either low, medium, high, or critical cave potential based on geology, occurrence of known caves, density of karst features, and potential impacts to freshwater aquifers<sup>[4]</sup>. These designations are also recognized by the New Mexico State Land Office (NMSLO). This project occurs within a **MEDIUM** karst occurrence zone (MKOZ)<sup>[5]</sup> (**Figure 1**).



**Figure 1: Karst occurrence zone overview.** Background image credit: Google Earth. Image date: April 2, 2023. Image datum: WGS-84.

A medium karst occurrence zone is defined as an area in known soluble rock types that may have a shallow insoluble overburden. These areas may contain isolated karst features such as caves and sinkholes. Groundwater recharge may not be wholly dependent on karst features, but the karst features still provide the most rapid aquifer recharge in response to surface runoff<sup>[4]</sup>.

**Due to the rapidity with which evaporite karst develops, each location within a BLM-CFO designated karst occurrence zone must be assessed on an individual basis to determine the existence of surface karst features and the possibility of sub-surface karst development each time a release occurs.**

### **1.4 Limitations of Report**

This report should be read in full. No responsibility is accepted for the use of any part of this report in any other context or for any other purpose or by third parties. This report does not purport to give legal advice. Legal advice can only be given by qualified legal practitioners.

This report has been prepared for the use of Ensolum, LLC, in accordance with generally accepted consulting practices. Every effort has been made to ensure the information in this report is accurate as of the time of its writing. This report has not been prepared for use by parties other than the client, their contracting party, and their respective consulting advisors. It may not contain sufficient information for the purposes of other parties or for other uses.

This report was prepared upon completion of the associated fieldwork using a standard template prepared by Southwest Geophysical Consulting and is based on information collected prior to fieldwork, conditions encountered on site, and data collected during the fieldwork and reviewed at the time of preparation. Southwest Geophysical Consulting disclaims responsibility for any changes that might have occurred at the site after this time. The interpreted results, locations, and depths noted in this report (if applicable) should be taken as an interpretation only and no decision should be based solely on this information. Physical verification of aerial imagery analysis results in the field should be conducted prior to using this information for remediation planning. Physical verification of geophysical results using geotechnical methods should be conducted.

To the best of our knowledge, the information contained in this report is accurate at the date of issue. Due to the nature of karst terrain, the information in this report shall not be used beyond two years past the date of the field work provided in section **2.3 Description of Survey**. Large weather events can shorten this time period as areas subject to karst development can rapidly form new features subsequent to these events.



## 2.0 LOCATION AND DESCRIPTION OF STUDY AREA

### 2.1 Description of Site

The site is located in Lea County, 45.3 kilometers (28.1 miles) east of Carlsbad, New Mexico, north of U.S. Highway 62 and south of County Road 243. The release site is located within the northwest  $\frac{1}{4}$  section 21, NM T20S R32E<sup>[6]</sup> (**Figure 1** and **Figure 2**). The region has flat-lying terrain with karstification occurring in the gypsite soils and underlying gypsum and dolomite bedrock<sup>[7]</sup> (see section **2.2 Local Geology Summary** for further information). The climate in this area of southeast New Mexico is semi-arid with an average annual precipitation of approximately 13 inches, of which about two-thirds falls as rain during summer thunderstorms from June to October. Summers are hot and sunny while winters are generally mild, with an average maximum temperature of 96°F in July and an average minimum temperature of 28°F in January<sup>[8]</sup>. This area is within the Chihuahuan Desert Thornscrub as defined by the Southwestern Regional ReGAP Vegetation map<sup>[9]</sup> and the vegetation consists mostly of areas of blue grama, nine-awned pappus grass, burro grass and low scrub including yucca. The spill delineation boundary is located within an MKOZ<sup>[5]</sup> (**Figure 1**) and within BLM-CFO managed land<sup>[10]</sup> (**Figure 2**).

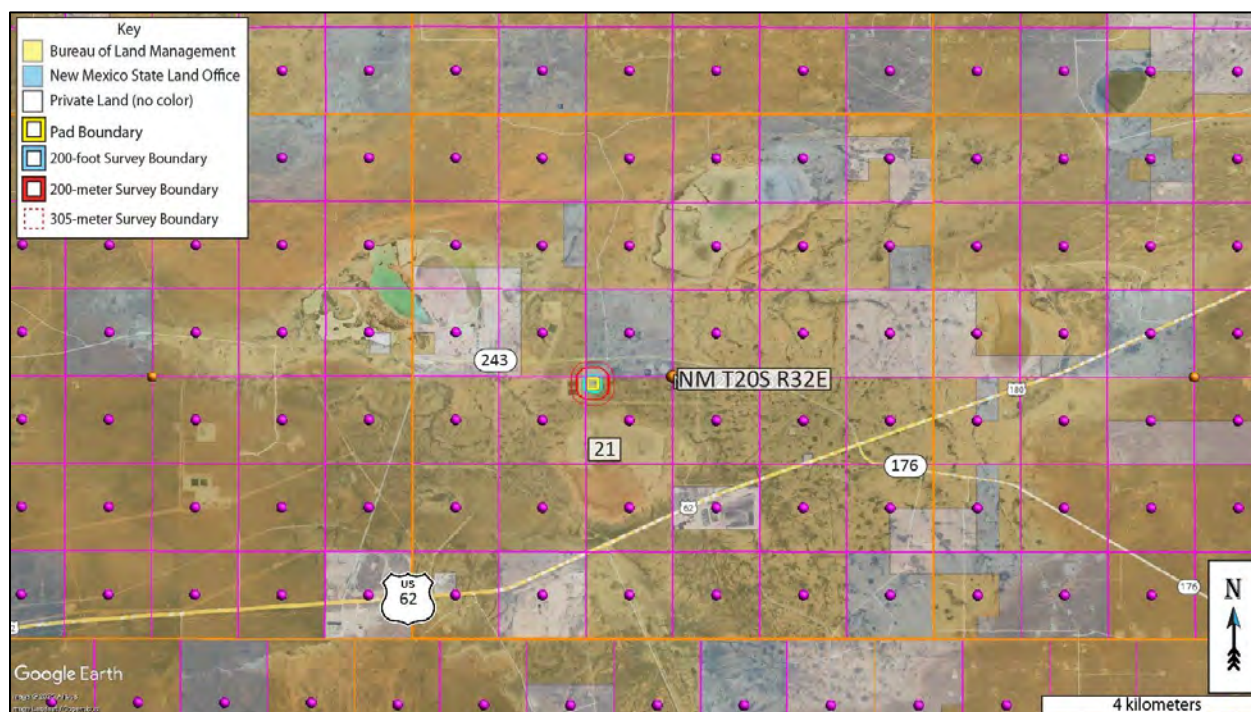


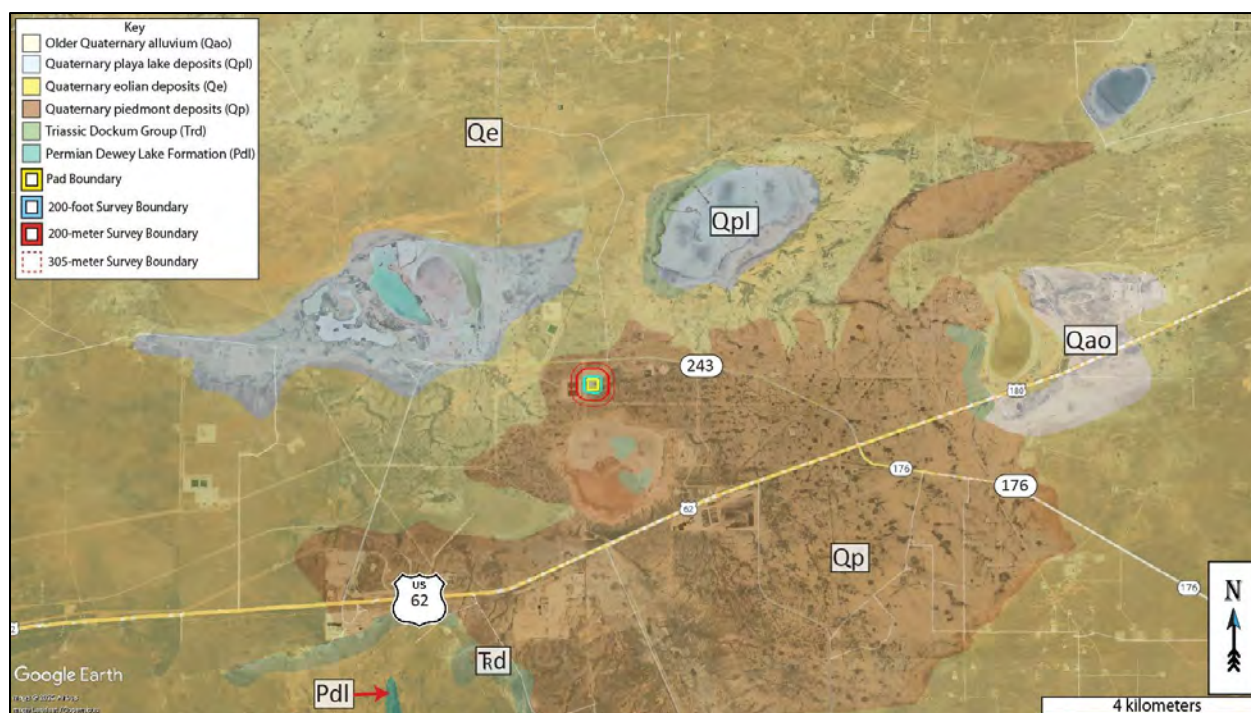
Figure 2: Land ownership and PLSS overview. Background image credit: Google Earth. Image date: April 2, 2023. Image datum: WGS-84.

## 2.2 Local Geology Summary

The site for the XB29 survey is located at an elevation of 1,073 meters (3,520 feet),  $\pm$  2 meters (6.6 feet), and is located within a region underlain by the Triassic Dockum Formation (Trd). The area is mantled by thin gypsiferous soils (gypsite), Quaternary lacustrine and playa lake deposits (Qpl), piedmont alluvial gravels (Qp), and eolian deposits (Qe)<sup>[11]</sup> up to 5 meters in depth (**Figure 3**).

The Dockum Formation (also called the Chinle Formation (Trc) on some maps) is a fossiliferous, variegated mudstone that can also include conglomerate, coarse sandstone, and shale lenses. The mudstones are generally dark reddish-brown to greyish-green and contain conspicuous cross-laminations<sup>[12]</sup>. The Dockum is not known to form karst features.

The survey area is covered by the easily accessible Geologic Map of New Mexico (2003) at 1:500,000 scale<sup>[13]</sup> and the Digital Geologic Map of New Mexico in ARC/INFO Format<sup>[11]</sup>.



**Figure 3: Geology overview.** Geology map credit: The Digital Geologic Map of New Mexico in ARC/INFO Format. Background image credit: Google Earth. Image date: April 2, 2023. Image datum: WGS-84.



## 2.3 Description of Survey

### 2.3.1 Surface Karst Survey

Southwest Geophysical Consulting, in partnership with SWCA Environmental Consultants, provides surface karst surveys using small, uncrewed aerial systems (sUAS) that are flown by qualified, FAA licensed drone pilots and that meet the stringent Bureau of Land Management – Carlsbad Field Office requirements for both pedestrian and aerial karst surveys.

The surface karst survey includes a desk study prior to the flight which allows us to provide client feedback in the event of any previously known karst features in the area. The desk study is performed out to 305 meters (1,000 feet) from the spill delineation boundary per New Mexico Oil Conservation Division guidance<sup>[1]</sup> (**Figure 4**). The study was performed using satellite and aerial imagery from Google Earth Pro dated April 2, 2023 (please note features less than one meter in diameter are generally not visible using this method); the Southwest Geophysical Cave and Karst Database dated August 1, 2025<sup>[14]</sup>; the Clayton Basin, NM, 1:62,500 quad, 1942, USGS topographic map; and the latest lidar imagery from CalTopo.com. Please note that we use older topographic maps because newer maps have had caves removed from them. These searches and queries returned no surface karst features within the 305-meter survey boundary.

Surface karst surveys are conducted by sUAS at low elevation within 200 meters of the spill delineation boundary<sup>[3]</sup> (**Figure 4**) following a preplanned raster pattern flightpath designed for the purpose of generating at least 75% imagery overlap. The collected high-resolution, georeferenced imagery is stitched together to develop orthomosaic imagery which is further developed into a digital elevation model (DEM); the DEM is then processed into a local relief model (LRM) (**Figure 6**). This LRM is color coded to enhance differences in elevation of as little as five centimeters. The orthoimagery, DEM, and LRM are uploaded to a server where they are analyzed by an experienced karst geologist. Finally, the data is reviewed by a senior karst geologist for quality assurance and downloaded into a table for inclusion in a written report<sup>[15]</sup>.

The resolution of the orthoimagery is clear enough that features as small as 10 centimeters can be positively identified in most circumstances. Occasionally there are ambiguous features identified during an aerial survey that will need to be checked in the field if they are impacted by the proposed remediation efforts. Specifically, it is difficult to tell the difference between solution tubes, abandoned uncased well bores, and some burrows in drone imagery. If an ambiguous feature is located during imagery analysis, it is marked with a yellow dot in **Figure 6**. If a feature of any likelihood is subsequently verified in the field prior to publication of the report, the dot will be changed to a red triangle if confirmed as a karst feature or deleted if not.



Figure 4: Surface survey overview. Background image credit: Google Earth. Image date: April 2, 2023. Datum: WGS-84.

The imagery for this study was collected via aerial survey by Pat Lagodney of SWCA on July 8, 2025. Surface karst features may have developed after this date and will not be noted in this report. Imagery analysis was completed by Kat Knight of Southwest Geophysical Consulting on July 24, 2025.



### 2.3.2 Geophysical Survey

For this survey, an ABEM Terrameter LS 2 and a 56-electrode array of 40-centimeter-long electrodes were used to image the subsurface. This survey consisted of three resistivity lines in a dipole-dipole configuration: line XB2901 was laid out west to east, lines XB2902 and XB2903 were laid out south to north. Line XB2902 consisted of 42 electrodes at 5-meter spacing resulting in a 205-meter-long array. Lines XB2901 and XB2903 consisted of 56 electrodes at 5-meter spacing resulting in 275-meter long arrays (**Figure 5, Table 1**). A preconfigured command file was used to run the data collection (DipoleDipole4X14). The 56-electrode configuration provided a depth of investigation of 55 meters (180 feet) with a resolution of 2.5 to 3.0 meters (8.2 to 9.8 feet). The 42-electrode configuration provided a depth of investigation of 41 meters (135 feet) with a resolution of 2.5 to 3.0 meters (8.2 to 9.8 feet) within the first 5 to 8 meters (16 to 26 feet) from the surface. A Leica GS18 GPS was used to record electrode locations and elevations.

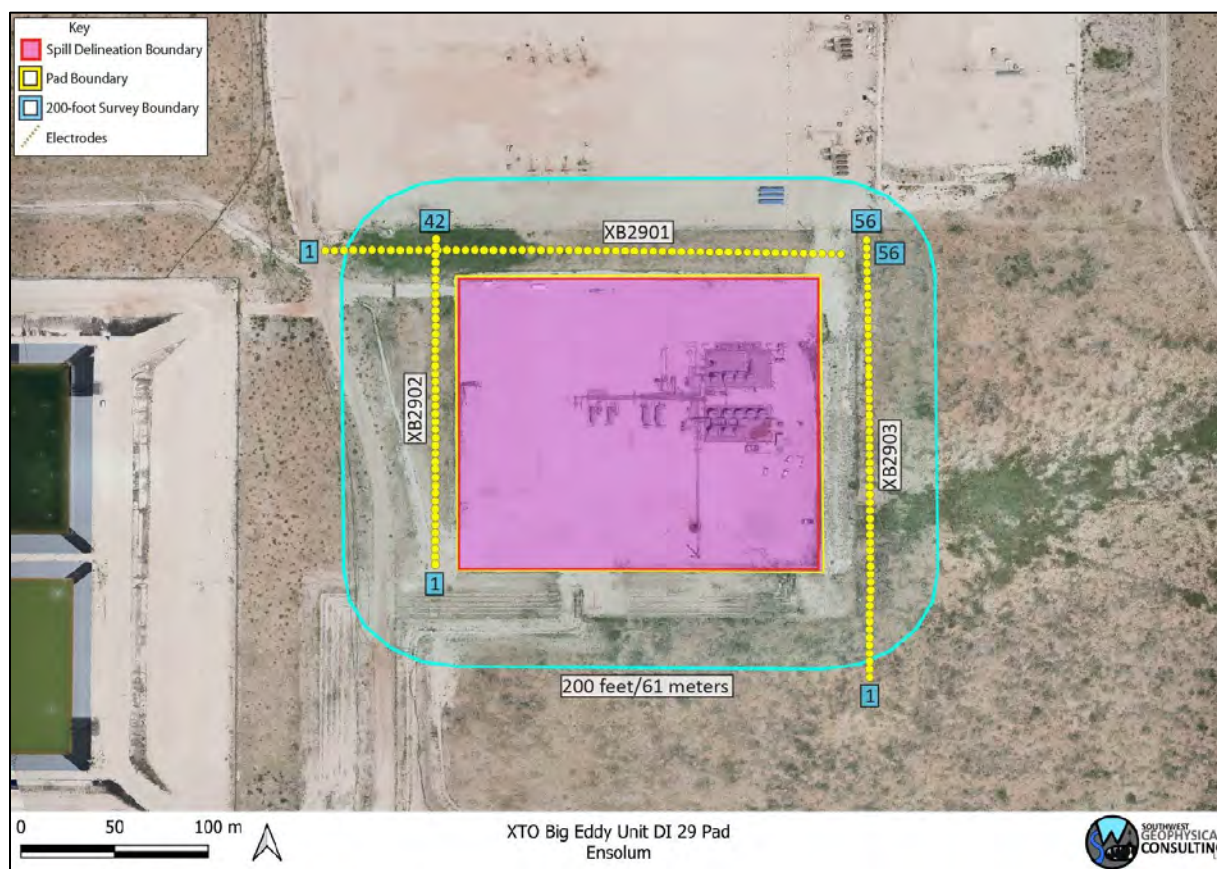


Figure 5: Geophysical survey overview. XB2902 was conducted with 42 electrodes at 5-meter spacing, and XB2901 and XB2903 were conducted with 56 electrodes at 5-meter spacing (yellow dots denoted with blue numbers). Background image credit: Google Earth. Image date: April 2, 2023. Image datum: WGS-84.

**Table 1** provides basic line data. Detailed information for each line including electrode number, location in latitude/longitude (decimal degree format), and elevation in meters can be found in the accompanying data files.

**Table 1: Survey Line Data Table.** The XB29\_ERI\_Points.kmz file contains all the points for the survey line listed in the file name. These data are available in the accompanying files XB29\_ERI\_Points.xlsx and ENS-019-20250609\_XB29\_Data\_Files.kmz.

File Name:	Completed By:	Date:
XB2901.kmz	Steven Kesler – Field Geologist Kat Knight – Field Geologist Michael Jones – Field Geologist	7/16/2025
XB2902.kmz		
XB2903.kmz		

EarthImager™ 2D software was used to download and process the data and to provide the model used to make our interpretations. The design of the survey and the orientation of each of the lines provides the information necessary to make the determination of “stable” or “unstable” ground at this site.

A typical starting model was used for the data processing due to the two-layer model of the geology in the area; specifically, generally high-resistivity gypsum and dolomite at the surface and low-resistivity saturated gypsum and dolomite bedrock at depth. The starting model used was “average apparent resistivity” and a default inversion setting of “surface,” with a minimum apparent resistivity set to 0.1 Ohm-meters (Ohm-m or  $\Omega$ -m) and a max apparent resistivity set to 100,000  $\Omega$ -m (**Table 2**).

**Table 2: Software Information and Settings**

Software Name:	EarthImager™ 2D
Version:	2.4.4.649
Starting Model:	Average Apparent Resistivity
Default Inversion Settings:	Surface
Changes to Default Inversion Settings:	Max Apparent Resistivity = 100 k $\Omega$ -m Min Apparent Resistivity = 0.1 $\Omega$ -m

**Note:** Raw data files (.stg files for EarthImager™ 2D) and processed data (.trn files, terrain files for surface correction in EarthImager™ 2D and .out files, the processed .stg files) are available upon request.

All field work, including setup, stow, and travel, was completed by Steven Kesler, Kat Knight, and Michael Jones on July 16, 2025.

### 3.0 RESULTS

#### 3.1 Surface Karst Survey

The desk study and surface karst survey located no surface karst features within the 200-foot (61-meter)<sup>[1]</sup> survey boundary (Figure 6).

No surface karst features exist within the **200-meter** survey boundary, and no springs exist within the 305-meter (1,000 foot) survey boundary<sup>[1]</sup>.

The lack of surface karst features does not mean the area is not karstified and the survey area may still contain buried karst features. Caution should be exercised while clearing brush and during any excavation, trenching, or construction operations. Employing a Bureau of Land Management approved karst monitor on site during these operations should be considered.

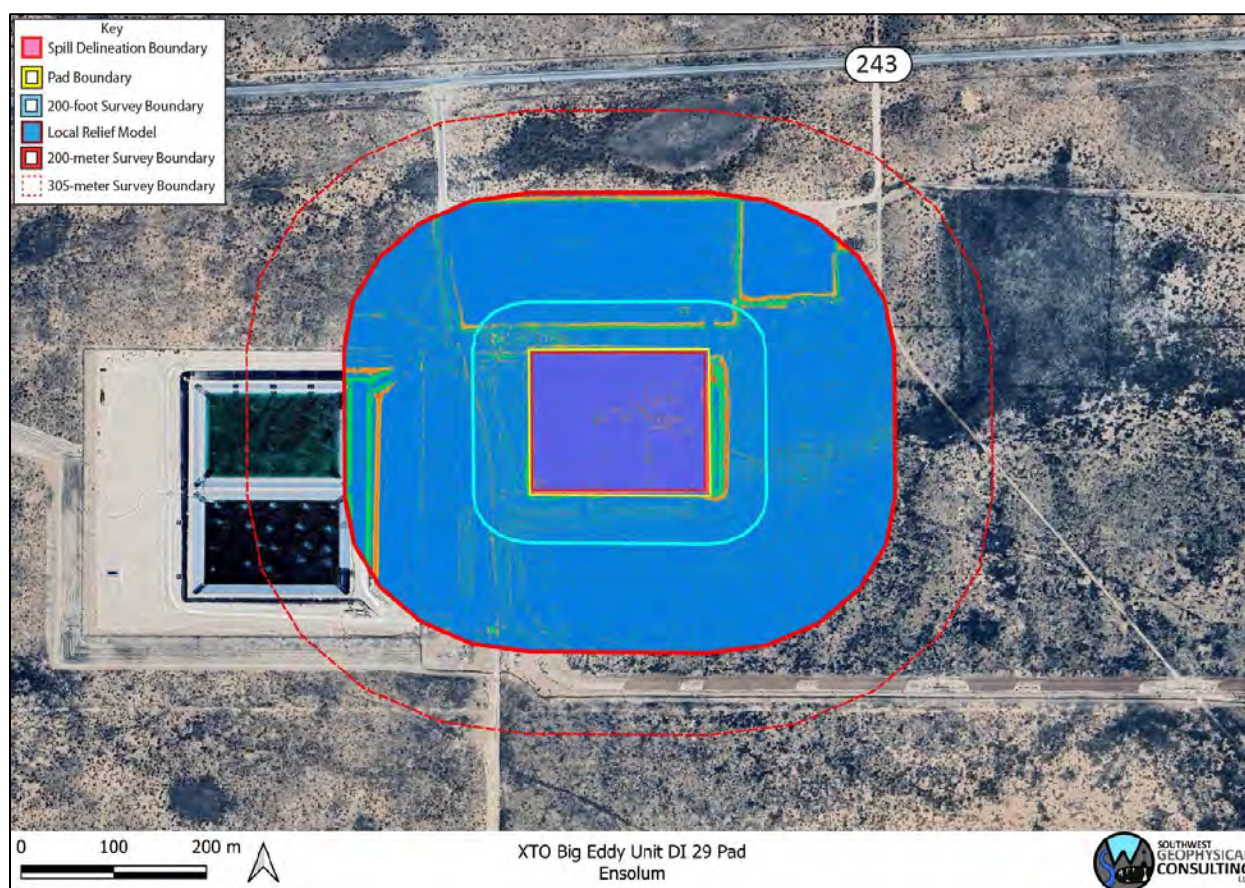


Figure 6: Surface karst survey results. Background image credit: Google Earth. Image date: April 2, 2023. Image datum: WGS-84.

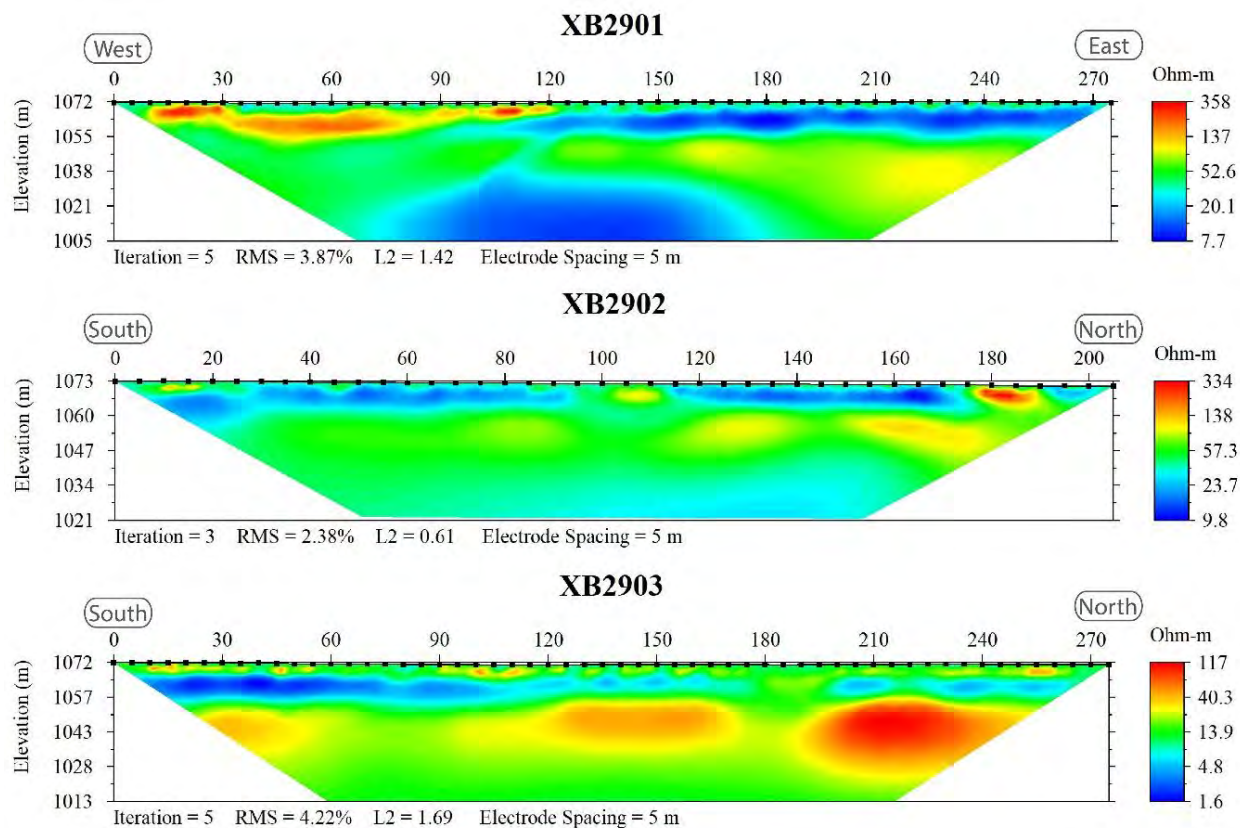


### 3.2 Geophysical Survey

Electrical resistivity tomography forms images of the subsurface by causing a current to flow through the rock and soil and then measuring the resistance of these materials as the current flows through them. This measurement is taken many times and the resulting data, once processed, is used to produce a model of the subsurface (**Figure 7**). This model is produced using "non-unique" solutions, which means that there are many models and interpretations which will satisfy the data. Using experience and knowledge of the local geology, a high-confidence model can be established and used to develop an accurate understanding of what lies below the surface. This survey was conducted with the express purpose of locating subsurface voids and does not purport to find paleokarst (old, non-active karst features that have been filled in with sand and sediment) or nascent karst features below the resolution limit of the survey.

The results of this study indicate a stable geologic system with resistivities between 1.6 and 358 Ohm-m (**Figure 7**). **No anomalies interpreted as underground voids were found in the XB29 survey area.** Please keep in mind when viewing the 2D inverted resistivity sections that color maps can be widely different for each view. Always check the color map located on the right side of the image when viewing the 2D images to ensure you understand the range of resistivities presented. Distances along the top and depths along the left side are in meters. The color map along the right side is in Ohm-m. Due to the nature of the survey, shallower zones have higher resolution between electrodes than deeper zones; therefore, small features at depth will not be visible.





**Figure 7: 2D inverted resistivity sections. Reds and oranges indicate higher resistivity values. Yellows and greens are medium-resistivity values. Blues are low-resistivity values. Please note that the color scale is relative.**

## 4.0 DISCUSSION

No surface karst exists and no anomalies interpreted as large near-surface voids are located within the study area. Due to the resolution limit of the survey, small voids at or near the resolution limit (2.5 – 3.0 meters) cannot be ruled out. Moderately high resistivity areas located less than 20 meters beneath the surface are interpreted as dry caliche or a more resistant sandstone; due to their low-resistivity values when compared with significant subsurface voids, these features should not be a concern for construction of any well pad infrastructure. Areas of moderate resistivity (yellows and greens) near the surface are interpreted as dry caliche soils and sandstone of the Dockum Formation. Very low-resistivity areas between 1.6 – 10 Ohm-m may either represent fluid from the brine release, surface-to-subsurface hydrologic pathways, or a layer of either clays and shale lenses or moist or saturated layers within the Dockum Formation (**Figure 7**).

Resistivity of the survey area drops below 50  $\Omega$ -m at approximately 13 - 17 meters (42.7 – 55.8 feet) depth and generally increases to greater than 100  $\Omega$ -m below these depths throughout the survey area, indicating a change from saturated caliche/gypsite soils to the bedrock of the Dockum Formation.

Please remember that these are interpretations made from knowledge of the local subsurface materials and experience. **They remain interpretations until verified by geotechnical methods.**

Within karst terrains like the project site, small air- or sediment-filled voids and/or brecciated zones and solutionally enlarged fractures that are below the resolution limit of the survey may exist; these may be encountered during excavation and if so, should be evaluated by a karst specialist prior to continuation of the excavation. Employing a BLM-CFO approved karst monitor on site during excavation in this area should be considered.

Fracture sets within the subsurface can act as hydrologic pathways to the water table. Rapid dissolution of gypsum can occur along these pathways creating solution-enlarged fractures, and in some cases, voids within months to years. For this reason, this survey is valid only for this remediation event.

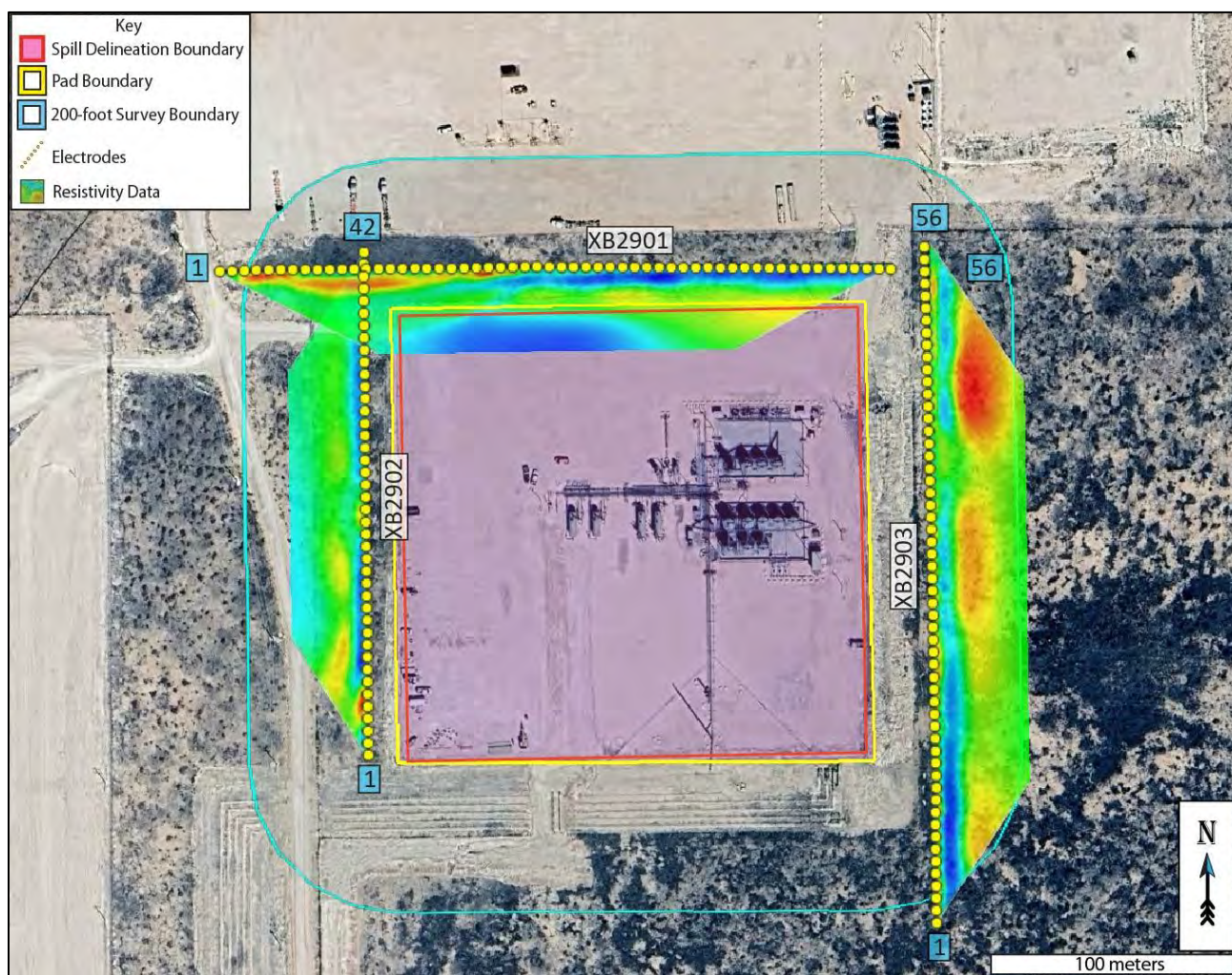


Figure 8: Data overlay. Colored trapezoids are 2D inverted resistivity lines. Background image credit: Google Earth. Image date: April 2, 2023.

## 5.0 SUMMARY

- The XB29 survey contains no surface karst features within 200 feet (61 meters) of the spill delineation boundary.
- The XB29 survey contains no subsurface anomalies which are interpreted as karst-related features within 200 feet (61 meters) of the spill delineation boundary.
- Flat-lying stratigraphy is interpreted to exist beneath the area where the geophysical survey was conducted, indicating stable ground.
- Employing a BLM-CFO approved karst monitor during excavation at this site should be considered.

## 6.0 DISCLOSURE STATEMENT

Karst occurrence zones are prone to rapid karst formation and warrant careful planning and engineering to mitigate karst-forming processes that could be accelerated by removal of surface cover or the vibrations associated with heavy equipment used in the remediation process.

Mitigation measures for any karst features revealed during excavation shall be approved by the Bureau of Land Management – Carlsbad Field Office and follow the Natural Resources Conservation Service Conservation Practice Standard for Karst Sinkhole Treatment, Code 527, or the Bureau of Land Management Cave and Karst Management Handbook, H-8380-1.

Vigilance during remediation activities is paramount. If voids are encountered during excavation, contact the Bureau of Land Management Karst Division at (575) 234-5972, the New Mexico State Land Office Surface Resources Division at (505) 827-5768, or a BLM-CFO approved karst contractor and request an on-site investigation from a karst expert if one is not already on site. A karst consultant can generally be available in Eddy County within five hours.

Approved karst monitors should have karst feature identification training, at least two years of supervised experience identifying karst features, wilderness first aid training, SRT training, confined space training, gas monitor training, and a minimum of SPAR cave rescue training through NCRC. They should have with them the proper gear and be prepared both physically and mentally to enter a collapse feature within minutes to perform a rescue if needed.

Monitoring services with qualified karst monitors, as well as cave surveys and geophysical surveys, are available from Southwest Geophysical Consulting.



Under no circumstances should an untrained, inexperienced person enter a cave, pit, sinkhole, or collapse feature. All field employees of Southwest Geophysical Consulting have extensive caving experience and the ability to determine whether entry into a karst feature is safe or presents a hazard. In the event it is necessary to enter a karst feature, Southwest Geophysical Consulting can provide these services on request.

Cave and karst resource inventory reports, karst feature investigations, and geophysical reports commissioned at the request of the land manager should be submitted to the BLM-CFO at [blm\\_nm\\_karst@blm.gov](mailto:blm_nm_karst@blm.gov).

Cave and karst resource inventory reports for the NMSLO should be submitted to the respective project manager.

Environmental karst reports should be submitted to the appropriate project manager at the New Mexico Oil Conservation Division.

## 7.0 REFERENCES

- 1 Division, O. C. *Title 19, Chapter 15, Part 29* (Oil Conservation Division, 2018).
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- 7 Decker, D. D., Land, L. & Luke, B. Characterization of Playa Lakes in the Gypsum Karst of Southeastern New Mexico and West Texas, USA. *Oklahoma Geological Survey Circular 113 113* (2021).
- 8 W.R.C.C. *National Climate Data Center 1981-2010 Normal Climate Summary for Carlsbad, New Mexico (291469)*, 2010).
- 9 Whitehead, W. & Flynn, C. *Plant Utilization in Southeastern New Mexico: Botany, Ethnobotany, and Archaeology*. (Bureau of Land Management, Carlsbad Field Office, 2017).
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- 12 McGowen, J. H., Granata, G. E. & Seni, S. J. Depositional Setting of the Triassic Dockum Group, Texas Panhandle - Eastern New Mexico. 57 (Bureau of Economic Geology, The University of Texas at Austin, Austin, TX, 1982).
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- 15 Whitehead, W., Bandy, M. & Decker, D. Protocol for Using UAV Photography for Rapid Assessment of Karst Features in Southeast New Mexico. *Proceedings of the 2022 Cave and Karst Management Symposium* (2022).



**8.0 GLOSSARY OF TERMS**

AGI	Advanced Geosciences Inc.
BLM-CFO	Bureau of Land Management - Carlsbad Field Office
brecciated	Fractured rock caused by faulting or collapse.
caprock-collapse sinkhole	Collapse of roof-spanning rock into a cave or void.
cave	Natural opening at the surface large enough for a person to enter.
cover-collapse sinkhole	Collapse of roof-spanning soil or clay ground cover into a subsurface void.
ERI	Electrical Resistivity Imaging
GPS	Global Positioning System
grike	A solutionally enlarged, vertical, or sub-vertical joint or fracture.
(H)	High confidence modifier for a PKF. This is typically reserved for a feature that is definitely karst but has not been confirmed in the field.
HKOZ	High Karst Occurrence Zone
karst	A landscape containing solutional features such as caves, sinkholes, swallets, and springs.
(L)	Low confidence modifier for a PKF. This is typically a feature that cannot be ruled out as karst but is most likely NOT karst related. This modifier may also be used for pseudokarst features.
(M)	Medium confidence modifier for PKF. This is an ambiguous feature that can't be positively identified as karst without a field visit (e.g., burrows, abandoned unlined wells, solution tubes, pseudokarst).
MKOZ	Medium Karst Occurrence Zone
NCRC	National Cave Rescue Commission
NKF	Non-karst feature. Used for features originally identified as PKF that have been subsequently identified in the field as non-karst related. This term may also be used for pseudokarst features.
NMSLO	New Mexico State Land Office
Ohm-m	Ohm-meter, a unit of measurement for resistivity. Sometimes abbreviated $\Omega$ -m.
paleokarst	Previously formed karst features that have been filled in by erosion and/or deposition of minerals.
Pat	Permian Artesia Group
Pc	Permian Capitan Formation
Pcs	Permian Castile Formation

PdI	Permian Dewey Lake Formation
PKF	Possible karst feature. This term is reserved for features identified in satellite or aerial imagery that have NOT been visited in the field. Further modifiers include (H) for high confidence, (M) for medium confidence, and (L) for low confidence. These confidence levels are based on field experience.
PLSS	Public Land Survey System
Pqg	Permian Queen/Greyburg Formation
Pru	Permian Rustler Formation
pseudokarst	Karst-like features (sinkholes, conduits, voids etc.) that are not formed by dissolution. These types of features include soil piping, lava tubes, and some cover-collapse and suffosion sinkholes.
Psl	Permian Salado Formation
Psr	Permian Seven Rivers Formation
Pt	Permian Tansill Formation
Py	Permian Yates Formation
Qal	Quaternary alluvium
Qe	Quaternary eolian deposits
Qp	Quaternary piedmont deposits
Qpl	Quaternary playa lake deposits
RKF	Recognized karst feature. This term is reserved for karst features that have been physically verified in the field.
SPAR	Small Party Assisted Rescue
sUAS	Small, uncrewed aerial system
suffosion sinkhole	Raveling of soil into a pre-existing void or fracture.
swallet	A natural opening in the surface, too small for a person, that drains water to an aquifer. Some are "open," meaning a void can be seen below; some are "closed," meaning they are full of sediment.
SWG	Southwest Geophysical Consulting, LLC
UTM	Universal Transverse Mercator (projected coordinates)
(V)	Field verified modifier for a RKF. This indicates that the feature has been visited by a qualified karst professional in the field and fully identified
WGS	World Geodetic System (geographic coordinates)

## 9.0 ATTESTATION

### David D. Decker, PhD, PG, CPG

Chief Executive Officer, Principal Geologist

Southwest Geophysical Consulting, LLC

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Albuquerque, NM 87114

[dave@swgeophys.com](mailto:dave@swgeophys.com)

(505) 585-2550

## CERTIFICATE OF AUTHOR

I, David D. Decker, a Licensed Professional Geologist and a Certified Professional Geologist, do certify that:

- I am currently employed as a consulting geologist in the specialty of caves and karst with an office address of 5117 Fairfax Dr. NW, Albuquerque, NM, USA, 87114.
- I graduated with a Master of Science in Applied Physics with a specialization in Sensor Systems from the Naval Post Graduate School in Monterey, California, in 2003, and a Doctor of Philosophy in Earth and Planetary Sciences from the University of New Mexico, Albuquerque, New Mexico, in 2018.
- I am a Licensed Professional Geologist in the State of Texas, USA (PG-15242) and have been since 2021. I am a Certified Professional Geologist through the American Institute of Professional Geologists (CPG-12123) and have been since 2021.
- I have been employed as a geologist continuously since 2016. I was previously employed as a Fire Controlman, Naval Flight Officer, and Aerospace Engineering Duty Officer in the U.S. Navy and operated, maintained, and installed various sensor systems including magnetic, electromagnetic, radar, communications, and acoustic systems in various capacities from 1986 through 2010.
- I have been involved in various aspects of cave and karst studies continuously since 1985, including exploration, mapping, and scientific studies.
- I have read the definition of “qualified karst professional” set out in the ASTM Standard Practice for Preliminary Karst Terrain Assessment for Site Development (ASTM E-1527). I meet the definition of “qualified professional” for the purposes of this standard.
- I am responsible for the content, compilation, and editing of all sections of report number ENS-019-20250609 entitled, “Environmental Karst Study Report, XTO Big Eddy Unit DI 29 Pad, Lea County, New Mexico.” I or a duly authorized and qualified representative of Southwest Geophysical Consulting, LLC, have personally visited this site and/or reviewed the aerial imagery on the date or dates mentioned in section **2.3 Description of Survey**.

- I have no prior involvement nor monetary interest in the described property or project, save for my fee for conducting this investigation and providing the report.

Dated in Albuquerque, New Mexico, August 27, 2025.



David D. Decker  
PhD, CPG-12123


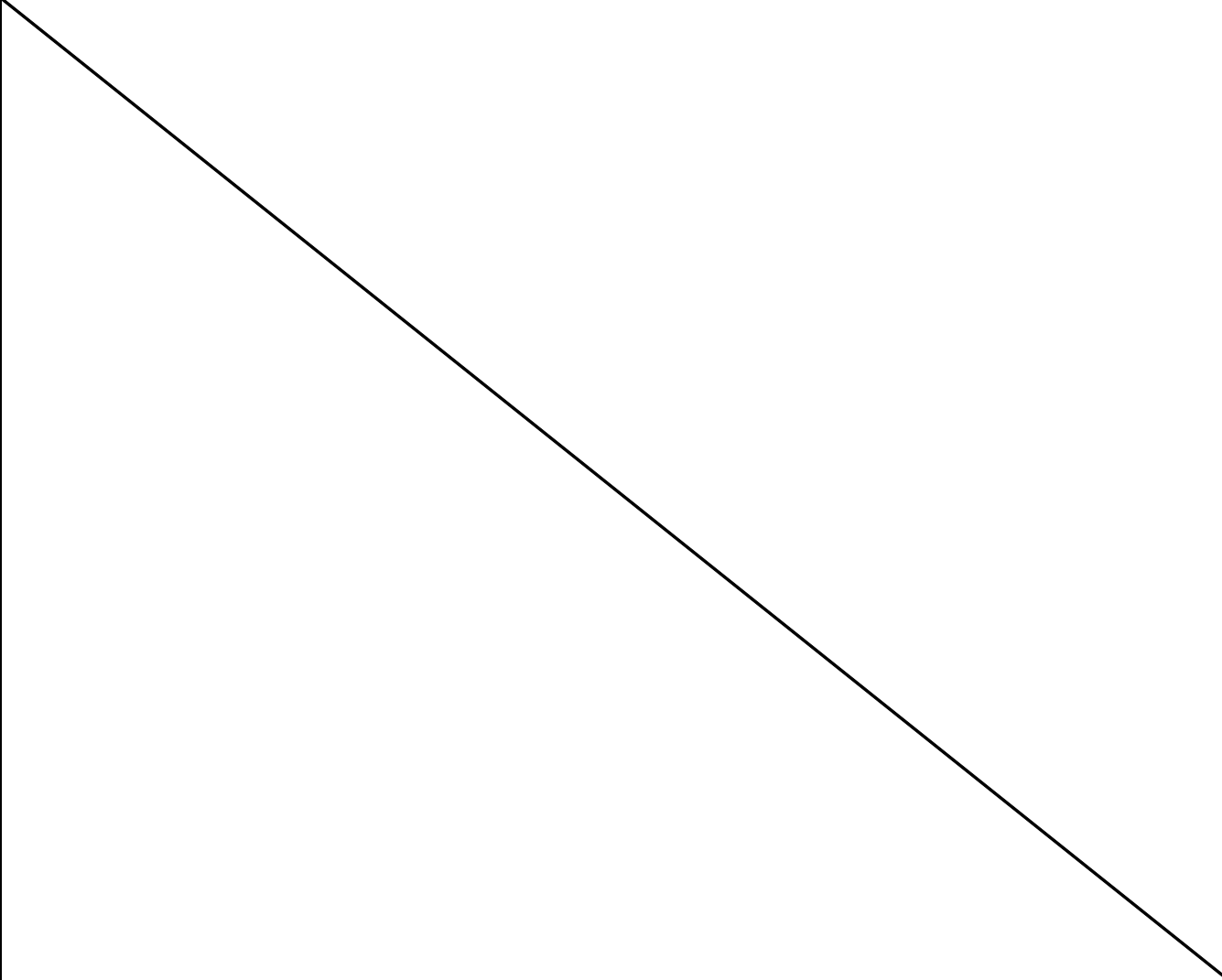





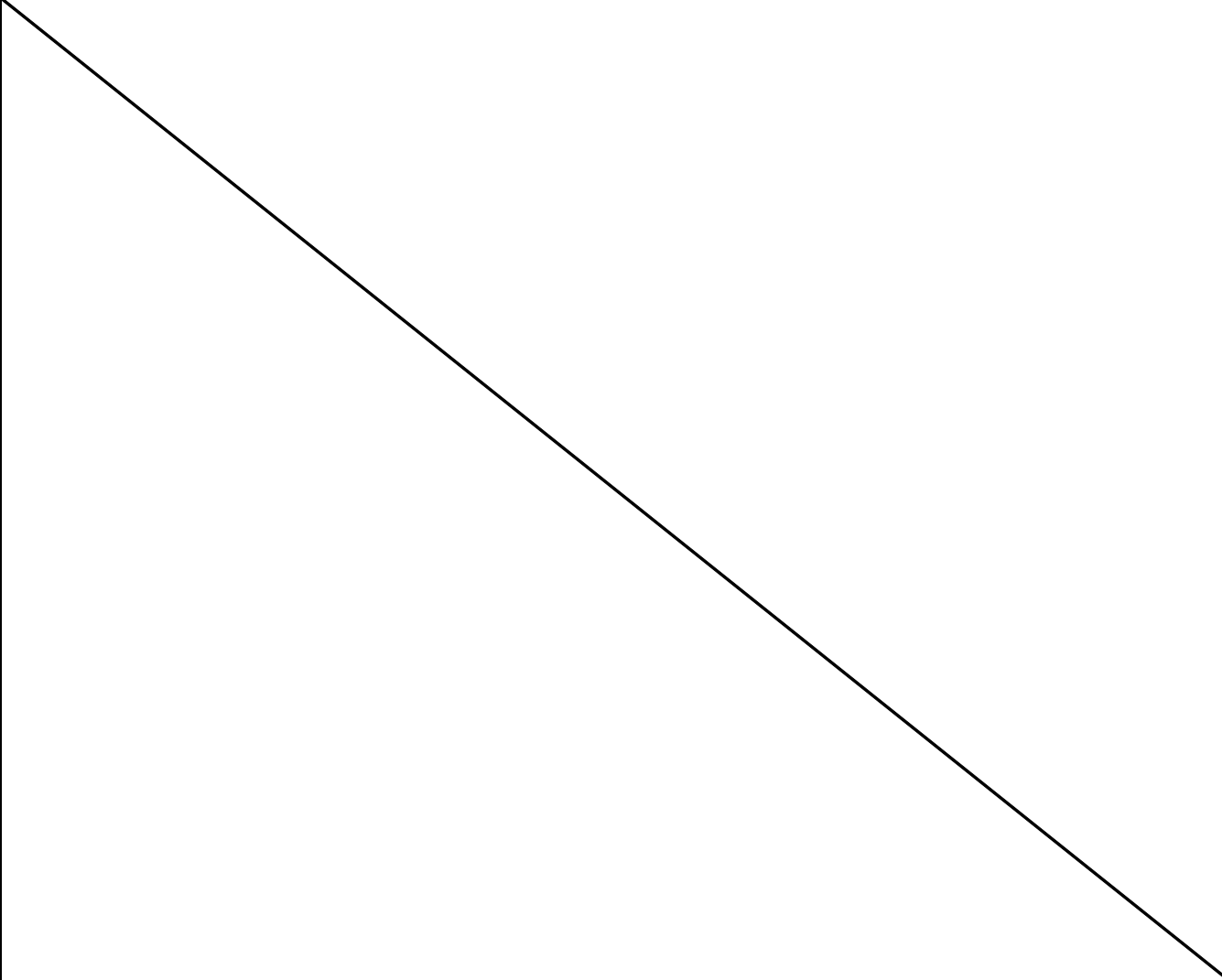
## APPENDIX C


### Lithologic Soil Sampling Logs

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					Sample Name: BH01		Date: 02/26/2025	
					Site Name: BEU DI 29 Pad			
					Incident Number: nAPP2434828618			
					Job Number: 03C1558585			
<b>LITHOLOGIC / SOIL SAMPLING LOG</b>					Logged By: Evan Roe		Method: Hand Auger	
Coordinates: 32.565023, -103.778007					Hole Diameter: 3.5 inch		Total Depth: 1-foot	
Comments: Field screening conducted with HACH Chloride Test Strips and PID for chloride and vapor, respectively. Chloride test performed with 1:4 dilution factor of soil to distilled water. A 40% Correction Factor for chloride is included								
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions
Dry	<162	0.6	N	BH01	0.5	0	CCHE	(0-1') CALICHE, light brown and tan, fine grained, uniform, no staining, no odor
Dry	<162	0.1	N	BH01	1	1		
Total Depth @ 1-foot								
								



								Sample Name: BH02		Date: 02/26/2025	
								Site Name: BEU DI 29 Pad			
								Incident Number: nAPP2434828618			
								Job Number: 03C1558585			
<b>LITHOLOGIC / SOIL SAMPLING LOG</b>								Logged By: Evan Roe		Method: Hand Auger	
Coordinates: 32.564851, -103.778187								Hole Diameter: 3.5 inch		Total Depth: 1-foot	
Comments: Field screening conducted with HACH Chloride Test Strips and PID for chloride and vapor, respectively. Chloride test performed with 1:4 dilution factor of soil to distilled water. A 40% Correction Factor for chloride is included											
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions			
Dry	196	0.5	N	BH02	0.5	0	SP-SM	(0-0.5') SILTY SAND, brown, fine, uniform, trace caliche, no odor			
Dry	162	0.0	N	BH02	1	1	CCHE	(0.5-1') CALICHE , tan, fine, uniform, no odor			
Total Depth @ 1-foot											
											

 <b>ENSOLUM</b>		Sample Name: BH03		Date: 10/02/2025				
		Site Name: BEU DI 29 Pad						
		Incident Number: nAPP2434828618						
		Job Number: 03C1558655						
<b>LITHOLOGIC / SOIL SAMPLING LOG</b>								
Coordinates: 32.5649327, -103.7781413			Logged By: ER		Method: Hand Auger			
			Hole Diameter: 3.5 Inch		Total Depth: 2-foot			
Comments: Field screening conducted with HACH Chloride Test Strips and PID for chloride and vapor, respectively. Chloride test performed with 1:4 dilution factor of soil to distilled water. No correction factors included.								
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions
D	229	1.4	Y	BH03	0.5	0	SP-SM	(0-0.5) SILTY SAND, brown, fine, uniform, trace caliche, faint odor, staining.
D	196	0.9	N			1	CCHE	(0.5-2) CALICHE, light brown and tan, fine grained w/ pebble-sized inclusions, no stain, no odor.
D	<150	0.1	N	BH03	2	2	CCHE	
Total Depth @ 2'								
<div style="position: absolute; top: 0; right: 0; width: 100%; height: 100%; border-left: 1px solid black; border-bottom: 1px solid black;"></div>								



## APPENDIX D

### Photographic Log

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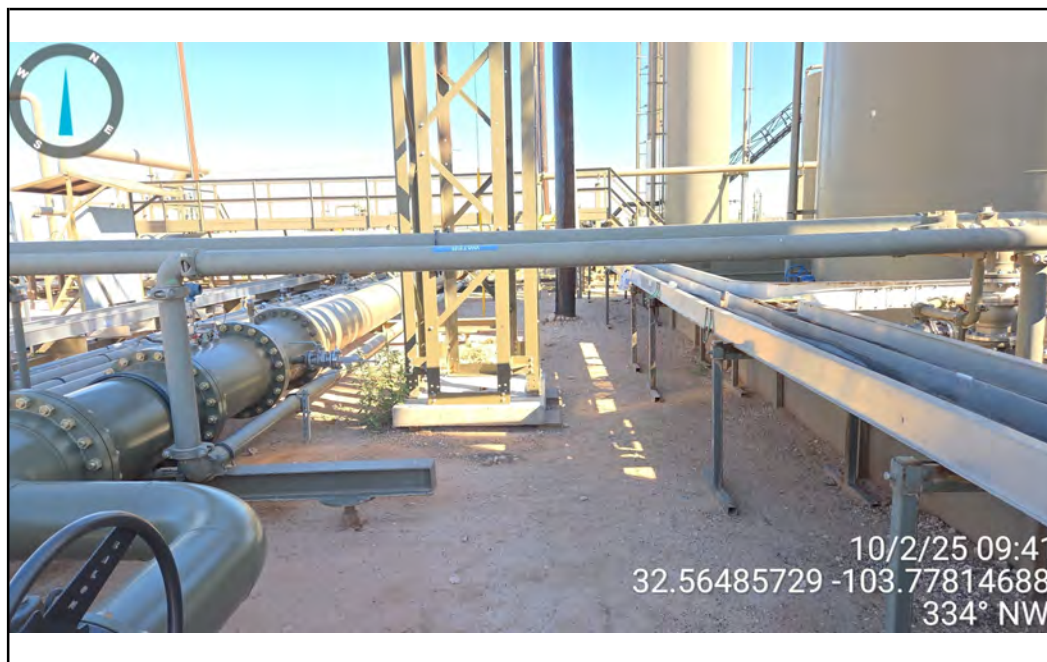


**Photographic Log**

XTO Energy, Inc.

BEU DI 29 Pad

nAPP2434828618



Photograph 1

Date: 10/02/2025

View: North

Description: Delineation activities near BH03



Photograph 2

Date: February 23, 2024

View: South

Description: Delineation activities near BH03



## APPENDIX E

### Laboratory Analytical Reports & Chain of Custody Documentation

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PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

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March 12, 2025

TRACY HILLARD

ENSOLUM, LLC

705 W WADLEY AVE.

MIDLAND, TX 79705

RE: BEU DI 29 PCA

Enclosed are the results of analyses for samples received by the laboratory on 02/27/25 14:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at

[www.tceq.texas.gov/field/ga/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/ga/lab_accred_certif.html).

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Total Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Cardinal Laboratories is accredited through the State of New Mexico Environment Department for:

Method SM 9223-B	Total Coliform and E. coli (Colilert MMO-MUG)
Method EPA 524.2	Regulated VOCs and Total Trihalomethanes (TTHM)
Method EPA 552.2	Total Haloacetic Acids (HAA-5)

Accreditation applies to public drinking water matrices for State of Colorado and New Mexico.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Lab Director/Quality Manager





PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**ENSOLUM, LLC  
705 W WADLEY AVE.  
MIDLAND TX, 79705Project: BEU DI 29 PCA  
Project Number: 03C1558585  
Project Manager: TRACY HILLARD  
Fax To:Reported:  
12-Mar-25 08:39

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
BH 02 .5	H251170-01	Soil	26-Feb-25 10:25	27-Feb-25 14:00
BH 02 1	H251170-02	Soil	26-Feb-25 10:39	27-Feb-25 14:00
BH 01 .5	H251170-03	Soil	26-Feb-25 12:25	27-Feb-25 14:00
BH 01 1	H251170-04	Soil	26-Feb-25 12:32	27-Feb-25 14:00
CS 01 .5	H251170-05	Soil	26-Feb-25 14:12	27-Feb-25 14:00
CS 02 .5	H251170-06	Soil	26-Feb-25 14:30	27-Feb-25 14:00

03/12/25 - Client changed the sample ID on -01 and -02 (see COC). This is the revised report and will replace the one sent on 02/28/25.

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

ENSOLUM, LLC  
705 W WADLEY AVE.  
MIDLAND TX, 79705

Project: BEU DI 29 PCA  
Project Number: 03C1558585  
Project Manager: TRACY HILLARD  
Fax To:

Reported:  
12-Mar-25 08:39

**BH 02 .5**  
**H251170-01 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

<b>Chloride</b>	<b>160</b>		16.0	mg/kg	4	5022825	HM	28-Feb-25	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5022711	JH	27-Feb-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID) 107 % 71.5-134 5022711 JH 27-Feb-25 8021B

**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	5022743	MS	27-Feb-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5022743	MS	27-Feb-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5022743	MS	27-Feb-25	8015B	

Surrogate: 1-Chlorooctane 99.4 % 48.2-134 5022743 MS 27-Feb-25 8015B

Surrogate: 1-Chlorooctadecane 104 % 49.1-148 5022743 MS 27-Feb-25 8015B

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM, LLC  
705 W WADLEY AVE.  
MIDLAND TX, 79705

Project: BEU DI 29 PCA  
Project Number: 03C1558585  
Project Manager: TRACY HILLARD  
Fax To:

Reported:  
12-Mar-25 08:39

**BH 02 1**  
**H251170-02 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

<b>Chloride</b>	<b>160</b>		16.0	mg/kg	4	5022825	HM	28-Feb-25	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5022711	JH	27-Feb-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID)			108 %	71.5-134		5022711	JH	27-Feb-25	8021B	
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**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	5022743	MS	27-Feb-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5022743	MS	27-Feb-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5022743	MS	27-Feb-25	8015B	

Surrogate: 1-Chlorooctane			107 %	48.2-134		5022743	MS	27-Feb-25	8015B	
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Surrogate: 1-Chlorooctadecane			112 %	49.1-148		5022743	MS	27-Feb-25	8015B	
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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM, LLC  
705 W WADLEY AVE.  
MIDLAND TX, 79705

Project: BEU DI 29 PCA  
Project Number: 03C1558585  
Project Manager: TRACY HILLARD  
Fax To:

Reported:  
12-Mar-25 08:39

**BH 01 .5**  
**H251170-03 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

<b>Chloride</b>	<b>112</b>		16.0	mg/kg	4	5022825	HM	28-Feb-25	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5022711	JH	27-Feb-25	8021B	

<i>Surrogate: 4-Bromofluorobenzene (PID)</i>			108 %	71.5-134		5022711	JH	27-Feb-25	8021B	
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**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	5022743	MS	27-Feb-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5022743	MS	27-Feb-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5022743	MS	27-Feb-25	8015B	

<i>Surrogate: 1-Chlorooctane</i>			98.2 %	48.2-134		5022743	MS	27-Feb-25	8015B	
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<i>Surrogate: 1-Chlorooctadecane</i>			101 %	49.1-148		5022743	MS	27-Feb-25	8015B	
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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM, LLC  
705 W WADLEY AVE.  
MIDLAND TX, 79705

Project: BEU DI 29 PCA  
Project Number: 03C1558585  
Project Manager: TRACY HILLARD  
Fax To:

Reported:  
12-Mar-25 08:39

**BH 01 1**  
**H251170-04 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

<b>Chloride</b>	<b>96.0</b>		16.0	mg/kg	4	5022825	HM	28-Feb-25	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5022711	JH	27-Feb-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID)			109 %	71.5-134		5022711	JH	27-Feb-25	8021B	
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**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	5022743	MS	28-Feb-25	8015B	
<b>DRO &gt;C10-C28*</b>	<b>13.5</b>		10.0	mg/kg	1	5022743	MS	28-Feb-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5022743	MS	28-Feb-25	8015B	

Surrogate: 1-Chlorooctane			95.2 %	48.2-134		5022743	MS	28-Feb-25	8015B	
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Surrogate: 1-Chlorooctadecane			98.6 %	49.1-148		5022743	MS	28-Feb-25	8015B	
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Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager





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**Analytical Results For:**

ENSOLUM, LLC  
705 W WADLEY AVE.  
MIDLAND TX, 79705

Project: BEU DI 29 PCA  
Project Number: 03C1558585  
Project Manager: TRACY HILLARD  
Fax To:

Reported:  
12-Mar-25 08:39

**CS 01 .5**  
**H251170-05 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

<b>Chloride</b>	<b>80.0</b>		16.0	mg/kg	4	5022810	AC	28-Feb-25	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5022711	JH	27-Feb-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID)			107 %	71.5-134		5022711	JH	27-Feb-25	8021B	
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**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	5022743	MS	28-Feb-25	8015B	
<b>DRO &gt;C10-C28*</b>	<b>22.8</b>		10.0	mg/kg	1	5022743	MS	28-Feb-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5022743	MS	28-Feb-25	8015B	

Surrogate: 1-Chlorooctane			99.6 %	48.2-134		5022743	MS	28-Feb-25	8015B	
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Surrogate: 1-Chlorooctadecane			102 %	49.1-148		5022743	MS	28-Feb-25	8015B	
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Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM, LLC  
705 W WADLEY AVE.  
MIDLAND TX, 79705

Project: BEU DI 29 PCA  
Project Number: 03C1558585  
Project Manager: TRACY HILLARD  
Fax To:

Reported:  
12-Mar-25 08:39

**CS 02 .5**  
**H251170-06 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

<b>Chloride</b>	<b>64.0</b>		16.0	mg/kg	4	5022810	AC	28-Feb-25	4500-Cl-B	
-----------------	-------------	--	------	-------	---	---------	----	-----------	-----------	--

**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5022711	JH	27-Feb-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5022711	JH	27-Feb-25	8021B	

<i>Surrogate: 4-Bromofluorobenzene (PID)</i>			107 %	71.5-134		5022711	JH	27-Feb-25	8021B	
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**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	5022743	MS	28-Feb-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5022743	MS	28-Feb-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5022743	MS	28-Feb-25	8015B	

<i>Surrogate: 1-Chlorooctane</i>			105 %	48.2-134		5022743	MS	28-Feb-25	8015B	
----------------------------------	--	--	-------	----------	--	---------	----	-----------	-------	--

<i>Surrogate: 1-Chlorooctadecane</i>			108 %	49.1-148		5022743	MS	28-Feb-25	8015B	
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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM, LLC  
705 W WADLEY AVE.  
MIDLAND TX, 79705

Project: BEU DI 29 PCA  
Project Number: 03C1558585  
Project Manager: TRACY HILLARD  
Fax To:

Reported:  
12-Mar-25 08:39

**Inorganic Compounds - Quality Control****Cardinal Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 5022810 - 1:4 DI Water****Blank (5022810-BLK1)**

Prepared &amp; Analyzed: 28-Feb-25

Chloride	ND	16.0	mg/kg							
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**LCS (5022810-BS1)**

Prepared &amp; Analyzed: 28-Feb-25

Chloride	432	16.0	mg/kg	400		108	80-120			
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**LCS Dup (5022810-BSD1)**

Prepared &amp; Analyzed: 28-Feb-25

Chloride	432	16.0	mg/kg	400		108	80-120	0.00	20	
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**Batch 5022825 - 1:4 DI Water****Blank (5022825-BLK1)**

Prepared &amp; Analyzed: 28-Feb-25

Chloride	ND	16.0	mg/kg							
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**LCS (5022825-BS1)**

Prepared &amp; Analyzed: 28-Feb-25

Chloride	416	16.0	mg/kg	400		104	80-120			
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**LCS Dup (5022825-BSD1)**

Prepared &amp; Analyzed: 28-Feb-25

Chloride	432	16.0	mg/kg	400		108	80-120	3.77	20	
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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

ENSOLUM, LLC  
705 W WADLEY AVE.  
MIDLAND TX, 79705

Project: BEU DI 29 PCA  
Project Number: 03C1558585  
Project Manager: TRACY HILLARD  
Fax To:

Reported:  
12-Mar-25 08:39

**Volatile Organic Compounds by EPA Method 8021 - Quality Control****Cardinal Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 5022711 - Volatiles****Blank (5022711-BLK1)**

Prepared &amp; Analyzed: 27-Feb-25

Benzene	ND	0.050	mg/kg							
Toluene	ND	0.050	mg/kg							
Ethylbenzene	ND	0.050	mg/kg							
Total Xylenes	ND	0.150	mg/kg							
Total BTEX	ND	0.300	mg/kg							
Surrogate: 4-Bromofluorobenzene (PID)	0.0540		mg/kg	0.0500		108	71.5-134			

**LCS (5022711-BS1)**

Prepared &amp; Analyzed: 27-Feb-25

Benzene	1.94	0.050	mg/kg	2.00		97.0	82.8-130			
Toluene	2.01	0.050	mg/kg	2.00		100	86-128			
Ethylbenzene	2.01	0.050	mg/kg	2.00		100	85.9-128			
m,p-Xylene	4.19	0.100	mg/kg	4.00		105	89-129			
o-Xylene	1.97	0.050	mg/kg	2.00		98.3	86.1-125			
Total Xylenes	6.16	0.150	mg/kg	6.00		103	88.2-128			
Surrogate: 4-Bromofluorobenzene (PID)	0.0520		mg/kg	0.0500		104	71.5-134			

**LCS Dup (5022711-BSD1)**

Prepared &amp; Analyzed: 27-Feb-25

Benzene	1.98	0.050	mg/kg	2.00		99.2	82.8-130	2.25	15.8	
Toluene	2.03	0.050	mg/kg	2.00		102	86-128	1.32	15.9	
Ethylbenzene	2.02	0.050	mg/kg	2.00		101	85.9-128	0.732	16	
m,p-Xylene	4.24	0.100	mg/kg	4.00		106	89-129	1.16	16.2	
o-Xylene	1.99	0.050	mg/kg	2.00		99.4	86.1-125	1.10	16.7	
Total Xylenes	6.23	0.150	mg/kg	6.00		104	88.2-128	1.14	16.3	
Surrogate: 4-Bromofluorobenzene (PID)	0.0501		mg/kg	0.0500		100	71.5-134			

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

ENSOLUM, LLC  
705 W WADLEY AVE.  
MIDLAND TX, 79705

Project: BEU DI 29 PCA  
Project Number: 03C1558585  
Project Manager: TRACY HILLARD  
Fax To:

Reported:  
12-Mar-25 08:39

**Petroleum Hydrocarbons by GC FID - Quality Control****Cardinal Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 5022743 - General Prep - Organics****Blank (5022743-BLK1)**

Prepared &amp; Analyzed: 27-Feb-25

GRO C6-C10	ND	10.0	mg/kg							
DRO >C10-C28	ND	10.0	mg/kg							
EXT DRO >C28-C36	ND	10.0	mg/kg							
Surrogate: 1-Chlorooctane	57.2		mg/kg	50.0		114	48.2-134			
Surrogate: 1-Chlorooctadecane	58.8		mg/kg	50.0		118	49.1-148			

**LCS (5022743-BS1)**

Prepared &amp; Analyzed: 27-Feb-25

GRO C6-C10	199	10.0	mg/kg	200		99.5	81.5-123			
DRO >C10-C28	196	10.0	mg/kg	200		98.1	77.7-122			
Total TPH C6-C28	395	10.0	mg/kg	400		98.8	80.9-121			
Surrogate: 1-Chlorooctane	63.0		mg/kg	50.0		126	48.2-134			
Surrogate: 1-Chlorooctadecane	66.8		mg/kg	50.0		134	49.1-148			

**LCS Dup (5022743-BS1)**

Prepared &amp; Analyzed: 27-Feb-25

GRO C6-C10	198	10.0	mg/kg	200		99.1	81.5-123	0.357	13	
DRO >C10-C28	193	10.0	mg/kg	200		96.5	77.7-122	1.71	15.6	
Total TPH C6-C28	391	10.0	mg/kg	400		97.8	80.9-121	1.03	18.5	
Surrogate: 1-Chlorooctane	58.5		mg/kg	50.0		117	48.2-134			
Surrogate: 1-Chlorooctadecane	61.4		mg/kg	50.0		123	49.1-148			

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Celey D. Keene, Lab Director/Quality Manager





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### Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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A handwritten signature in cursive script, appearing to read "Celey D. Keene", written in black ink.

---

Celey D. Keene, Lab Director/Quality Manager



101 East Marland, Hobbs, NM 88240  
(575) 393-2326 FAX (575) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: Ensolum, LLC

BILL TO

ANALYSIS REQUEST

Project Manager: Tracy Hillard

P.O. #:

Address: 601 N Marientfield Street, Suite 400

Company: XTO Energy, Inc

City: Midland

State: TX Zip: 79701

Attn: Colton Brown

Phone #: 575-937-3906

Fax #:

Address: 3104 E Greene St

Project #: 036 558585

Project Owner: XTO Energy

City: Carlsbad

Project Name: BEU D1 29 PEA

State: NM Zip: 88220

Project Location: 32.56474, -103.77799

Phone #:

Sample Name: Even Rae

Fax #:

FOR LAB USE ONLY

FOR LAB USE ONLY		Lab I.D.	Sample I.D.	Depth (feet)	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						PRESERV.	SAMPLING																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
GROUNDWATER	WASTEWATER						SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :	DATE	TIME																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																
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Relinquished By:

Date: 8-27-25 Received By: [Signature]

Verbal Result: ☐ Yes ☐ No Add'l Phone #:

Relinquished By:

Date: 8-27-25 Received By: [Signature]

REMARKS: \*Customer requested ID changes to 3/7/25

Delivered By: (Circle One)

Observed Temp.: 31 Corrected Temp.: 34

Turnaround Time: #140 Rush Standard ☒ Bacteria (only) Sample Condition Cool Intact ☐ Yes ☐ No Corrected Temp.: 34

Sampler - UPS - Bus - Other:

Observed Temp.: 31 Corrected Temp.: 34

Turnaround Time: #140 Rush Standard ☒ Bacteria (only) Sample Condition Cool Intact ☐ Yes ☐ No Corrected Temp.: 34

TURN-008 R 3.2 10/07/21

† Cardinal cannot accept verbal changes. Please email changes to celey.keene@cardinallabsnm.com



Environment Testing

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# ANALYTICAL REPORT

## PREPARED FOR

Attn: Tracy Hillard

Ensolum

601 N. Marienfeld St.

Suite 400

Midland, Texas 79701

Generated 10/6/2025 11:07:55 AM

## JOB DESCRIPTION

BEU DI 29 Pad

03C1558585

## JOB NUMBER

890-8906-1

Eurofins Carlsbad  
1089 N Canal St.  
Carlsbad NM 88220

# Eurofins Carlsbad

## Job Notes

This report may not be reproduced except in full, and with written approval from the laboratory. The results relate only to the samples tested. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

Analytical test results meet all requirements of the associated regulatory program (i.e., NELAC (TNI), DoD, and ISO 17025) unless otherwise noted under the individual analysis.

## Authorization



Generated  
10/6/2025 11:07:55 AM

Authorized for release by  
Jessica Kramer, Project Manager  
[Jessica.Kramer@et.eurofinsus.com](mailto:Jessica.Kramer@et.eurofinsus.com)  
(432)704-5440

Client: Ensolum  
Project/Site: BEU DI 29 Pad

Laboratory Job ID: 890-8906-1  
SDG: 03C1558585

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Definitions/Glossary

Client: Ensolum  
Project/Site: BEU DI 29 Pad

Job ID: 890-8906-1  
SDG: 03C1558585

Qualifiers

GC VOA

Qualifier	Qualifier Description
F1	MS and/or MSD recovery exceeds control limits.
U	Indicates the analyte was analyzed for but not detected.

GC Semi VOA

Qualifier	Qualifier Description
*1	LCS/LCSD RPD exceeds control limits.
U	Indicates the analyte was analyzed for but not detected.

HPLC/IC

Qualifier	Qualifier Description
4	MS, MSD: The analyte present in the original sample is greater than 4 times the matrix spike concentration; therefore, control limits are not applicable.
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: Ensolum  
Project: BEU DI 29 Pad

Job ID: 890-8906-1

**Job ID: 890-8906-1**

**Eurofins Carlsbad**

### Job Narrative 890-8906-1

The analytical test results presented in this report meet all requirements of the associated regulatory program listed on the Accreditation/Certification Summary Page, unless otherwise noted. Data qualifiers and/or narrative comments are included to explain any exceptions, if applicable. Regulated compliance samples (e.g. SDWA, NPDES) must comply with associated agency requirements/permits.

- Matrix-specific batch QC (e.g., MS, MSD, SD) may not be reported when insufficient sample volume is available or when site-specific QC samples are not submitted. In such cases, a Laboratory Control Sample Duplicate (LCSD) may be analyzed to provide precision data for the batch.
- For samples analyzed using surrogate and/or isotope dilution analytes, any recoveries falling outside of established acceptance criteria are re-prepared and/or re-analyzed to confirm results, unless the deviation is due to sample dilution or otherwise explained in the case narrative.

### Receipt

The samples were received on 10/2/2025 2:59 PM. 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 2.8°C.

### Receipt Exceptions

The following samples were received and analyzed from an unpreserved bulk soil jar: BH03 (890-8906-1) and BH03 (890-8906-2).

### GC VOA

Method 8021B: The matrix spike duplicate (MSD) recoveries for preparation batch 880-120457 and analytical batch 880-120472 were outside control limits. Non-homogeneity is suspected because the associated laboratory control sample (LCS) recovery was within acceptance limits.

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

### Diesel Range Organics

Method 8015MOD\_NM: The RPD of the laboratory control sample (LCS) and laboratory control sample duplicate (LCSD) for preparation batch 880-120404 and analytical batch 880-120510 recovered outside control limits for the following analytes: Diesel Range Organics (Over C10-C28).

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

### HPLC/IC

Method 300\_ORGFM\_28D - Soluble: The matrix spike / matrix spike duplicate (MS/MSD) recoveries for preparation batch 880-120489 and analytical batch 880-120491 were outside control limits for one or more analytes. See QC Sample Results for detail. Sample matrix interference and/or non-homogeneity are suspected because the associated laboratory control sample (LCS) recovery is within acceptance limits.

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

Eurofins Carlsbad

## Client Sample Results

Client: Ensolum  
Project/Site: BEU DI 29 Pad

Job ID: 890-8906-1  
SDG: 03C1558585

Client Sample ID: BH03

Lab Sample ID: 890-8906-1

Date Collected: 10/02/25 09:06

Matrix: Solid

Date Received: 10/02/25 14:59

Sample Depth: 0.5

## Method: SW846 8021B - Volatile Organic Compounds (GC)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	<0.00200	U F1	0.00200	mg/Kg		10/03/25 11:48	10/03/25 17:58	1
Toluene	<0.00200	U F1	0.00200	mg/Kg		10/03/25 11:48	10/03/25 17:58	1
Ethylbenzene	<0.00200	U	0.00200	mg/Kg		10/03/25 11:48	10/03/25 17:58	1
m-Xylene & p-Xylene	<0.00399	U	0.00399	mg/Kg		10/03/25 11:48	10/03/25 17:58	1
o-Xylene	<0.00200	U	0.00200	mg/Kg		10/03/25 11:48	10/03/25 17:58	1
Xylenes, Total	<0.00399	U	0.00399	mg/Kg		10/03/25 11:48	10/03/25 17:58	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	122		70 - 130	10/03/25 11:48	10/03/25 17:58	1
1,4-Difluorobenzene (Surr)	104		70 - 130	10/03/25 11:48	10/03/25 17:58	1

## Method: TAL SOP Total BTEX - Total BTEX Calculation

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Total BTEX	<0.00399	U	0.00399	mg/Kg			10/03/25 17:58	1

## Method: SW846 8015 NM - Diesel Range Organics (DRO) (GC)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Total TPH	<50.0	U	50.0	mg/Kg			10/06/25 11:23	1

## Method: SW846 8015B NM - Diesel Range Organics (DRO) (GC)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Gasoline Range Organics (GRO)-C6-C10	<50.0	U	50.0	mg/Kg		10/03/25 08:21	10/06/25 11:23	1
Diesel Range Organics (Over C10-C28)	<50.0	U *1	50.0	mg/Kg		10/03/25 08:21	10/06/25 11:23	1
Oil Range Organics (Over C28-C36)	<50.0	U	50.0	mg/Kg		10/03/25 08:21	10/06/25 11:23	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
1-Chlorooctane	85		70 - 130	10/03/25 08:21	10/06/25 11:23	1
o-Terphenyl	86		70 - 130	10/03/25 08:21	10/06/25 11:23	1

## Method: EPA 300.0 - Anions, Ion Chromatography - Soluble

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Chloride	386		10.0	mg/Kg			10/04/25 18:56	1

Client Sample ID: BH03

Lab Sample ID: 890-8906-2

Date Collected: 10/02/25 09:30

Matrix: Solid

Date Received: 10/02/25 14:59

Sample Depth: 2

## Method: SW846 8021B - Volatile Organic Compounds (GC)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	<0.00201	U	0.00201	mg/Kg		10/03/25 11:48	10/03/25 18:19	1
Toluene	<0.00201	U	0.00201	mg/Kg		10/03/25 11:48	10/03/25 18:19	1
Ethylbenzene	<0.00201	U	0.00201	mg/Kg		10/03/25 11:48	10/03/25 18:19	1
m-Xylene & p-Xylene	<0.00402	U	0.00402	mg/Kg		10/03/25 11:48	10/03/25 18:19	1
o-Xylene	<0.00201	U	0.00201	mg/Kg		10/03/25 11:48	10/03/25 18:19	1
Xylenes, Total	<0.00402	U	0.00402	mg/Kg		10/03/25 11:48	10/03/25 18:19	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	90		70 - 130	10/03/25 11:48	10/03/25 18:19	1

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## Client Sample Results

Client: Ensolum  
Project/Site: BEU DI 29 Pad

Job ID: 890-8906-1  
SDG: 03C1558585

Client Sample ID: BH03

Lab Sample ID: 890-8906-2

Date Collected: 10/02/25 09:30

Matrix: Solid

Date Received: 10/02/25 14:59

Sample Depth: 2

## Method: SW846 8021B - Volatile Organic Compounds (GC) (Continued)

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
1,4-Difluorobenzene (Surr)	121		70 - 130	10/03/25 11:48	10/03/25 18:19	1

## Method: TAL SOP Total BTEX - Total BTEX Calculation

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Total BTEX	<0.00402	U	0.00402	mg/Kg			10/03/25 18:19	1

## Method: SW846 8015 NM - Diesel Range Organics (DRO) (GC)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Total TPH	<49.8	U	49.8	mg/Kg			10/06/25 11:38	1

## Method: SW846 8015B NM - Diesel Range Organics (DRO) (GC)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Gasoline Range Organics (GRO)-C6-C10	<49.8	U	49.8	mg/Kg		10/03/25 08:21	10/06/25 11:38	1
Diesel Range Organics (Over C10-C28)	<49.8	U *1	49.8	mg/Kg		10/03/25 08:21	10/06/25 11:38	1
Oil Range Organics (Over C28-C36)	<49.8	U	49.8	mg/Kg		10/03/25 08:21	10/06/25 11:38	1
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
1-Chlorooctane	82		70 - 130			10/03/25 08:21	10/06/25 11:38	1
o-Terphenyl	83		70 - 130			10/03/25 08:21	10/06/25 11:38	1

## Method: EPA 300.0 - Anions, Ion Chromatography - Soluble

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Chloride	214		10.1	mg/Kg			10/04/25 19:14	1

## Surrogate Summary

Client: Ensolum  
Project/Site: BEU DI 29 Pad

Job ID: 890-8906-1  
SDG: 03C1558585

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

Matrix: Solid

Prep Type: Total/NA

		Percent Surrogate Recovery (Acceptance Limits)	
Lab Sample ID	Client Sample ID	BFB1 (70-130)	DFBZ1 (70-130)
890-8906-1	BH03	122	104
890-8906-1 MS	BH03	93	91
890-8906-1 MSD	BH03	106	93
890-8906-2	BH03	90	121
LCS 880-120457/1-A	Lab Control Sample	89	105
LCSD 880-120457/2-A	Lab Control Sample Dup	90	92
MB 880-120457/5-A	Method Blank	103	85
<b>Surrogate Legend</b>			
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)	
Lab Sample ID	Client Sample ID	1CO1 (70-130)	OTPH1 (70-130)
880-63341-A-57-D MS	Matrix Spike	98	90
880-63341-A-57-E MSD	Matrix Spike Duplicate	80	89
890-8906-1	BH03	85	86
890-8906-2	BH03	82	83
LCS 880-120404/2-A	Lab Control Sample	93	87
LCSD 880-120404/3-A	Lab Control Sample Dup	90	101
MB 880-120404/1-A	Method Blank	74	77
<b>Surrogate Legend</b>			
1CO = 1-Chlorooctane			
OTPH = o-Terphenyl			

## QC Sample Results

Client: Ensolum  
Project/Site: BEU DI 29 Pad

Job ID: 890-8906-1  
SDG: 03C1558585

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

Lab Sample ID: MB 880-120457/5-A

Matrix: Solid

Analysis Batch: 120472

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 120457

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	<0.00200	U	0.00200	mg/Kg		10/03/25 11:48	10/03/25 17:37	1
Toluene	<0.00200	U	0.00200	mg/Kg		10/03/25 11:48	10/03/25 17:37	1
Ethylbenzene	<0.00200	U	0.00200	mg/Kg		10/03/25 11:48	10/03/25 17:37	1
m-Xylene & p-Xylene	<0.00400	U	0.00400	mg/Kg		10/03/25 11:48	10/03/25 17:37	1
o-Xylene	<0.00200	U	0.00200	mg/Kg		10/03/25 11:48	10/03/25 17:37	1
Xylenes, Total	<0.00400	U	0.00400	mg/Kg		10/03/25 11:48	10/03/25 17:37	1

Surrogate	MB %Recovery	MB Qualifier	Limits	Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	103		70 - 130	10/03/25 11:48	10/03/25 17:37	1
1,4-Difluorobenzene (Surr)	85		70 - 130	10/03/25 11:48	10/03/25 17:37	1

Lab Sample ID: LCS 880-120457/1-A

Matrix: Solid

Analysis Batch: 120472

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 120457

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Benzene	0.100	0.08408		mg/Kg		84	70 - 130
Toluene	0.100	0.08329		mg/Kg		83	70 - 130
Ethylbenzene	0.100	0.08694		mg/Kg		87	70 - 130
m-Xylene & p-Xylene	0.200	0.1789		mg/Kg		89	70 - 130
o-Xylene	0.100	0.09086		mg/Kg		91	70 - 130

Surrogate	LCS %Recovery	LCS Qualifier	Limits
4-Bromofluorobenzene (Surr)	89		70 - 130
1,4-Difluorobenzene (Surr)	105		70 - 130

Lab Sample ID: LCSD 880-120457/2-A

Matrix: Solid

Analysis Batch: 120472

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Prep Batch: 120457

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Benzene	0.100	0.08574		mg/Kg		86	70 - 130	2	35
Toluene	0.100	0.08492		mg/Kg		85	70 - 130	2	35
Ethylbenzene	0.100	0.08894		mg/Kg		89	70 - 130	2	35
m-Xylene & p-Xylene	0.200	0.1834		mg/Kg		92	70 - 130	2	35
o-Xylene	0.100	0.09234		mg/Kg		92	70 - 130	2	35

Surrogate	LCSD %Recovery	LCSD Qualifier	Limits
4-Bromofluorobenzene (Surr)	90		70 - 130
1,4-Difluorobenzene (Surr)	92		70 - 130

Lab Sample ID: 890-8906-1 MS

Matrix: Solid

Analysis Batch: 120472

Client Sample ID: BH03

Prep Type: Total/NA

Prep Batch: 120457

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec Limits
Benzene	<0.00200	U F1	0.100	0.07199		mg/Kg		72	70 - 130
Toluene	<0.00200	U F1	0.100	0.07388		mg/Kg		74	70 - 130

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## QC Sample Results

Client: Ensolum  
Project/Site: BEU DI 29 Pad

Job ID: 890-8906-1  
SDG: 03C1558585

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

Lab Sample ID: 890-8906-1 MS

Matrix: Solid

Analysis Batch: 120472

Client Sample ID: BH03

Prep Type: Total/NA

Prep Batch: 120457

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec Limits
Ethylbenzene	<0.00200	U	0.100	0.07726		mg/Kg		77	70 - 130
m-Xylene & p-Xylene	<0.00399	U	0.200	0.1586		mg/Kg		79	70 - 130
o-Xylene	<0.00200	U	0.100	0.07932		mg/Kg		79	70 - 130

Surrogate	MS %Recovery	MS Qualifier	Limits
4-Bromofluorobenzene (Surr)	93		70 - 130
1,4-Difluorobenzene (Surr)	91		70 - 130

Lab Sample ID: 890-8906-1 MSD

Matrix: Solid

Analysis Batch: 120472

Client Sample ID: BH03

Prep Type: Total/NA

Prep Batch: 120457

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Benzene	<0.00200	U F1	0.100	0.06652	F1	mg/Kg		67	70 - 130	8	35
Toluene	<0.00200	U F1	0.100	0.06950	F1	mg/Kg		69	70 - 130	6	35
Ethylbenzene	<0.00200	U	0.100	0.07233		mg/Kg		72	70 - 130	7	35
m-Xylene & p-Xylene	<0.00399	U	0.200	0.1529		mg/Kg		76	70 - 130	4	35
o-Xylene	<0.00200	U	0.100	0.07554		mg/Kg		76	70 - 130	5	35

Surrogate	MSD %Recovery	MSD Qualifier	Limits
4-Bromofluorobenzene (Surr)	106		70 - 130
1,4-Difluorobenzene (Surr)	93		70 - 130

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

Lab Sample ID: MB 880-120404/1-A

Matrix: Solid

Analysis Batch: 120510

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 120404

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		10/03/25 08:21	10/06/25 08:36	1
Diesel Range Organics (Over C10-C28)	<50.0	U	50.0	mg/Kg		10/03/25 08:21	10/06/25 08:36	1
Oil Range Organics (Over C28-C36)	<50.0	U	50.0	mg/Kg		10/03/25 08:21	10/06/25 08:36	1

Surrogate	MB %Recovery	MB Qualifier	Limits	Prepared	Analyzed	Dil Fac
1-Chlorooctane	74		70 - 130	10/03/25 08:21	10/06/25 08:36	1
o-Terphenyl	77		70 - 130	10/03/25 08:21	10/06/25 08:36	1

Lab Sample ID: LCS 880-120404/2-A

Matrix: Solid

Analysis Batch: 120510

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 120404

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Gasoline Range Organics (GRO)-C6-C10	1000	891.3		mg/Kg		89	70 - 130
Diesel Range Organics (Over C10-C28)	1000	773.5		mg/Kg		77	70 - 130

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## QC Sample Results

Client: Ensolum  
Project/Site: BEU DI 29 Pad

Job ID: 890-8906-1  
SDG: 03C1558585

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

Lab Sample ID: LCS 880-120404/2-A

Matrix: Solid

Analysis Batch: 120510

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 120404

	LCS	LCS	
Surrogate	%Recovery	Qualifier	Limits
1-Chlorooctane	93		70 - 130
o-Terphenyl	87		70 - 130

Lab Sample ID: LCSD 880-120404/3-A

Matrix: Solid

Analysis Batch: 120510

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Prep Batch: 120404

			Spike	LCSD	LCSD				%Rec			
Analyte			Added	Result	Qualifier	Unit	D	%Rec	Limits	RPD	Limit	
Gasoline Range Organics (GRO)-C6-C10			1000	1056		mg/Kg		106	70 - 130	17	20	
Diesel Range Organics (Over C10-C28)			1000	968.4	*1	mg/Kg		97	70 - 130	22	20	
	LCSD	LCSD										
Surrogate	%Recovery	Qualifier	Limits									
1-Chlorooctane	90		70 - 130									
o-Terphenyl	101		70 - 130									

Lab Sample ID: 880-63341-A-57-D MS

Matrix: Solid

Analysis Batch: 120510

Client Sample ID: Matrix Spike

Prep Type: Total/NA

Prep Batch: 120404

	Sample	Sample	Spike	MS	MS				%Rec			
Analyte	Result	Qualifier	Added	Result	Qualifier	Unit	D	%Rec	Limits	RPD	Limit	
Gasoline Range Organics (GRO)-C6-C10	<50.0	U	1000	946.8		mg/Kg		93	70 - 130			
Diesel Range Organics (Over C10-C28)	<50.0	U *1	1000	808.0		mg/Kg		79	70 - 130			
	MS	MS										
Surrogate	%Recovery	Qualifier	Limits									
1-Chlorooctane	98		70 - 130									
o-Terphenyl	90		70 - 130									

Lab Sample ID: 880-63341-A-57-E MSD

Matrix: Solid

Analysis Batch: 120510

Client Sample ID: Matrix Spike Duplicate

Prep Type: Total/NA

Prep Batch: 120404

	Sample	Sample	Spike	MSD	MSD				%Rec			
Analyte	Result	Qualifier	Added	Result	Qualifier	Unit	D	%Rec	Limits	RPD	Limit	
Gasoline Range Organics (GRO)-C6-C10	<50.0	U	1000	971.1		mg/Kg		95	70 - 130	3	20	
Diesel Range Organics (Over C10-C28)	<50.0	U *1	1000	868.9		mg/Kg		85	70 - 130	7	20	
	MSD	MSD										
Surrogate	%Recovery	Qualifier	Limits									
1-Chlorooctane	80		70 - 130									
o-Terphenyl	89		70 - 130									

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## QC Sample Results

Client: Ensolum  
Project/Site: BEU DI 29 Pad

Job ID: 890-8906-1  
SDG: 03C1558585

## Method: 300.0 - Anions, Ion Chromatography

Lab Sample ID: MB 880-120489/1-A

Matrix: Solid

Analysis Batch: 120491

Client Sample ID: Method Blank

Prep Type: Soluble

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Chloride	<10.0	U	10.0	mg/Kg			10/04/25 16:53	1

Lab Sample ID: LCS 880-120489/2-A

Matrix: Solid

Analysis Batch: 120491

Client Sample ID: Lab Control Sample

Prep Type: Soluble

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Chloride	250	253.6		mg/Kg		101	90 - 110

Lab Sample ID: LCSD 880-120489/3-A

Matrix: Solid

Analysis Batch: 120491

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	255.9		mg/Kg		102	90 - 110	1	20

Lab Sample ID: 880-63422-A-11-B MS

Matrix: Solid

Analysis Batch: 120491

Client Sample ID: Matrix Spike

Prep Type: Soluble

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec Limits
Chloride	1250		250	1426	4	mg/Kg		69	90 - 110

Lab Sample ID: 880-63422-A-11-C MSD

Matrix: Solid

Analysis Batch: 120491

Client Sample ID: Matrix Spike Duplicate

Prep Type: Soluble

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Chloride	1250		250	1427	4	mg/Kg		69	90 - 110	0	20

QC Association Summary

Client: Ensolum  
Project/Site: BEU DI 29 Pad

Job ID: 890-8906-1  
SDG: 03C1558585

GC VOA

Prep Batch: 120457

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
890-8906-1	BH03	Total/NA	Solid	5035	
890-8906-2	BH03	Total/NA	Solid	5035	
MB 880-120457/5-A	Method Blank	Total/NA	Solid	5035	
LCS 880-120457/1-A	Lab Control Sample	Total/NA	Solid	5035	
LCSD 880-120457/2-A	Lab Control Sample Dup	Total/NA	Solid	5035	
890-8906-1 MS	BH03	Total/NA	Solid	5035	
890-8906-1 MSD	BH03	Total/NA	Solid	5035	

Analysis Batch: 120472

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
890-8906-1	BH03	Total/NA	Solid	8021B	120457
890-8906-2	BH03	Total/NA	Solid	8021B	120457
MB 880-120457/5-A	Method Blank	Total/NA	Solid	8021B	120457
LCS 880-120457/1-A	Lab Control Sample	Total/NA	Solid	8021B	120457
LCSD 880-120457/2-A	Lab Control Sample Dup	Total/NA	Solid	8021B	120457
890-8906-1 MS	BH03	Total/NA	Solid	8021B	120457
890-8906-1 MSD	BH03	Total/NA	Solid	8021B	120457

Analysis Batch: 120536

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
890-8906-1	BH03	Total/NA	Solid	Total BTEX	
890-8906-2	BH03	Total/NA	Solid	Total BTEX	

GC Semi VOA

Prep Batch: 120404

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
890-8906-1	BH03	Total/NA	Solid	8015NM Prep	
890-8906-2	BH03	Total/NA	Solid	8015NM Prep	
MB 880-120404/1-A	Method Blank	Total/NA	Solid	8015NM Prep	
LCS 880-120404/2-A	Lab Control Sample	Total/NA	Solid	8015NM Prep	
LCSD 880-120404/3-A	Lab Control Sample Dup	Total/NA	Solid	8015NM Prep	
880-63341-A-57-D MS	Matrix Spike	Total/NA	Solid	8015NM Prep	
880-63341-A-57-E MSD	Matrix Spike Duplicate	Total/NA	Solid	8015NM Prep	

Analysis Batch: 120510

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
890-8906-1	BH03	Total/NA	Solid	8015B NM	120404
890-8906-2	BH03	Total/NA	Solid	8015B NM	120404
MB 880-120404/1-A	Method Blank	Total/NA	Solid	8015B NM	120404
LCS 880-120404/2-A	Lab Control Sample	Total/NA	Solid	8015B NM	120404
LCSD 880-120404/3-A	Lab Control Sample Dup	Total/NA	Solid	8015B NM	120404
880-63341-A-57-D MS	Matrix Spike	Total/NA	Solid	8015B NM	120404
880-63341-A-57-E MSD	Matrix Spike Duplicate	Total/NA	Solid	8015B NM	120404

Analysis Batch: 120557

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
890-8906-1	BH03	Total/NA	Solid	8015 NM	
890-8906-2	BH03	Total/NA	Solid	8015 NM	

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QC Association Summary

Client: Ensolum  
Project/Site: BEU DI 29 Pad

Job ID: 890-8906-1  
SDG: 03C1558585

HPLC/IC

Leach Batch: 120489

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
890-8906-1	BH03	Soluble	Solid	DI Leach	
890-8906-2	BH03	Soluble	Solid	DI Leach	
MB 880-120489/1-A	Method Blank	Soluble	Solid	DI Leach	
LCS 880-120489/2-A	Lab Control Sample	Soluble	Solid	DI Leach	
LCSD 880-120489/3-A	Lab Control Sample Dup	Soluble	Solid	DI Leach	
880-63422-A-11-B MS	Matrix Spike	Soluble	Solid	DI Leach	
880-63422-A-11-C MSD	Matrix Spike Duplicate	Soluble	Solid	DI Leach	

Analysis Batch: 120491

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
890-8906-1	BH03	Soluble	Solid	300.0	120489
890-8906-2	BH03	Soluble	Solid	300.0	120489
MB 880-120489/1-A	Method Blank	Soluble	Solid	300.0	120489
LCS 880-120489/2-A	Lab Control Sample	Soluble	Solid	300.0	120489
LCSD 880-120489/3-A	Lab Control Sample Dup	Soluble	Solid	300.0	120489
880-63422-A-11-B MS	Matrix Spike	Soluble	Solid	300.0	120489
880-63422-A-11-C MSD	Matrix Spike Duplicate	Soluble	Solid	300.0	120489

Lab Chronicle

Client: Ensolum  
Project/Site: BEU DI 29 Pad

Job ID: 890-8906-1  
SDG: 03C1558585

Client Sample ID: BH03  
Date Collected: 10/02/25 09:06  
Date Received: 10/02/25 14:59

Lab Sample ID: 890-8906-1  
Matrix: Solid

Prep Type	Batch Type	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	5035			5.01 g	5 mL	120457	10/03/25 11:48	AA	EET MID
Total/NA	Analysis	8021B		1	5 mL	5 mL	120472	10/03/25 17:58	MNR	EET MID
Total/NA	Analysis	Total BTEX		1			120536	10/03/25 17:58	SA	EET MID
Total/NA	Analysis	8015 NM		1			120557	10/06/25 11:23	AJ	EET MID
Total/NA	Prep	8015NM Prep			10.01 g	10 mL	120404	10/03/25 08:21	EL	EET MID
Total/NA	Analysis	8015B NM		1	1 uL	1 uL	120510	10/06/25 11:23	AJ	EET MID
Soluble	Leach	DI Leach			4.98 g	50 mL	120489	10/04/25 14:56	SMC	EET MID
Soluble	Analysis	300.0		1	50 mL	50 mL	120491	10/04/25 18:56	CS	EET MID

Client Sample ID: BH03  
Date Collected: 10/02/25 09:30  
Date Received: 10/02/25 14:59

Lab Sample ID: 890-8906-2  
Matrix: Solid

Prep Type	Batch Type	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	5035			4.98 g	5 mL	120457	10/03/25 11:48	AA	EET MID
Total/NA	Analysis	8021B		1	5 mL	5 mL	120472	10/03/25 18:19	MNR	EET MID
Total/NA	Analysis	Total BTEX		1			120536	10/03/25 18:19	SA	EET MID
Total/NA	Analysis	8015 NM		1			120557	10/06/25 11:38	AJ	EET MID
Total/NA	Prep	8015NM Prep			10.04 g	10 mL	120404	10/03/25 08:21	EL	EET MID
Total/NA	Analysis	8015B NM		1	1 uL	1 uL	120510	10/06/25 11:38	AJ	EET MID
Soluble	Leach	DI Leach			4.97 g	50 mL	120489	10/04/25 14:56	SMC	EET MID
Soluble	Analysis	300.0		1	50 mL	50 mL	120491	10/04/25 19:14	CS	EET MID

Laboratory References:  
EET MID = Eurofins Midland, 1211 W. Florida Ave, Midland, TX 79701, TEL (432)704-5440



Accreditation/Certification Summary

Client: Ensolum  
Project/Site: BEU DI 29 Pad

Job ID: 890-8906-1  
SDG: 03C1558585

Laboratory: Eurofins 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	06-30-26
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
8015 NM		Solid	Total TPH
Total BTEX		Solid	Total BTEX

Method Summary

Client: Ensolum  
Project/Site: BEU DI 29 Pad

Job ID: 890-8906-1  
SDG: 03C1558585

Method	Method Description	Protocol	Laboratory
8021B	Volatile Organic Compounds (GC)	SW846	EET MID
Total BTEX	Total BTEX Calculation	TAL SOP	EET MID
8015 NM	Diesel Range Organics (DRO) (GC)	SW846	EET MID
8015B NM	Diesel Range Organics (DRO) (GC)	SW846	EET MID
300.0	Anions, Ion Chromatography	EPA	EET MID
5035	Closed System Purge and Trap	SW846	EET MID
8015NM Prep	Microextraction	SW846	EET MID
DI Leach	Deionized Water Leaching Procedure	ASTM	EET MID

Protocol References:

- ASTM = ASTM International
- EPA = US Environmental Protection Agency
- SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.
- TAL SOP = TestAmerica Laboratories, Standard Operating Procedure

Laboratory References:

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

Sample Summary

Client: Ensolum  
Project/Site: BEU DI 29 Pad

Job ID: 890-8906-1  
SDG: 03C1558585

Lab Sample ID	Client Sample ID	Matrix	Collected	Received	Depth
890-8906-1	BH03	Solid	10/02/25 09:06	10/02/25 14:59	0.5
890-8906-2	BH03	Solid	10/02/25 09:30	10/02/25 14:59	2

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14



Environment Testing  
Xenco

Houston, TX (281) 240-4200, Dallas, TX (214) 902-0300  
Midland, TX (432) 704-5440, San Antonio, TX (210) 509-3334  
El Paso, TX (915) 585-3443, Lubbock, TX (806) 794-1296  
Hobbs, NM (575) 392-7550, Carlsbad, NM (575) 988-3199

## Chain of Custody

Project Manager:	Tracy Hilliard	Bill to: (if different)	Colton Brown
Company Name:	Ensolum	Company Name:	XTO Energy, Inc
Address:	3122 National Parks Hwy	Address:	3104 E Greene St
City, State ZIP:	Carlsbad, NM 88220	City, State ZIP:	Carlsbad, NM 88220
Phone:	<del>402-296-6622</del> 575-137-3446	Email:	kthomas@.Timorisseey, Thiliard, Jreich, Bbeall@ensolum.com

Program: UST/PST ☐ RP ☐ rownfields ☐ RC ☐ perfund ☐  
 State of Project:  
 Reporting: Level II ☐ Level III ☐ PST/UST ☐ TRRP ☐ Level IV ☐  
 Deliverables: EDD ☐ ADaPT ☐ Other:



890-8906 Chain of Custody

[illegible]

<del>Total: 200.7+6040</del>	<del>200.8+10020:</del>	6RCRA	13PPM	Texas	1	Al	Sb	As	Ba	Be	B	Cd	Ca	Cr	Co	Cu	Fe	Pb	Mg	Mn	Mo	Ni	K	Se	Ag	SiO <sub>2</sub>	Na	Sr	Ti	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	Ti	U	Hg: 1631 / 245.1 / 7470 / 7471											

Notice: Signature of this document and relinquishment of samples constitutes a valid purchase order from client company to Eurofins Xenco, its affiliates and subcontractors. It assigns standard terms and conditions of service. Eurofins 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 Eurofins Xenco. A minimum charge of \$85.00 will be applied to each project and a charge of \$5 for each sample submitted to Eurofins 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 <i>Ann Orr</i>	<i>deed</i>	2:59 PM			
3		4			
5		6			

## Eurofins Carlsbad

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

## Chain of Custody Record



### Environment Testing

[illegible]

## Login Sample Receipt Checklist

Client: Ensolum

Job Number: 890-8906-1

SDG Number: 03C1558585

Login Number: 8906

List Number: 1

Creator: Lopez, Abraham

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.	N/A	Refer to Job Narrative for details.
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: Ensolum

Job Number: 890-8906-1

SDG Number: 03C1558585

Login Number: 8906

List Number: 2

Creator: Laing, Edmundo

List Source: Eurofins Midland

List Creation: 10/03/25 09:52 AM

Question	Answer	Comment
The cooler's custody seal, if present, is intact.	N/A	
Sample custody seals, if present, are intact.	N/A	
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	



## APPENDIX F

### March 10, 2025 Deferral Request

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March 10, 2025

**New Mexico Oil Conservation Division**

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

**Re: Deferral Request  
BEU DI 29 Pad  
Incident Numbers nAPP2434828618  
Lea County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of XTO Energy, Inc. (XTO), has prepared this *Deferral Request* to document assessment, delineation, and soil sampling activities at the BEU DI 29 Pad (Site). The purpose of the assessment and soil sampling activities was to assess for the presence or absence of impacts to soil following a produced water and crude oil release on the pad surface due to dump valve failure. Based on field observations, field screening activities, and soil sample laboratory analytical results, XTO is submitting this *Deferral Request*, describing Site assessment and delineation activities that have occurred and requesting deferral of final remediation for Incident Number nAPP2434828618 until the Site is reconstructed, and/or the well pad is abandoned.

**SITE DESCRIPTION AND RELEASE SUMMARY**

The Site is located in Unit D, Section 21, Township 20 South, Range 32 East, in Lea County, New Mexico (32.564955°, -103.778164°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management. It was originally reported as being associated with State Land managed by the New Mexico State Land Office (SLO) but after further review of available land access maps, it was confirmed to be located on Federal Land.

On December 10, 2024, failure of a dump valve resulted in the release of 8 barrels (bbls) of produced water and 1 bbl of crude oil into a lined containment and released overspray on and between active production structures, engineered facility equipment, and onto the surface of the well pad. A vacuum truck was immediately dispatched to the Site to recover free-standing fluids; 8 bbls of produced water were recovered. XTO reported the release to the New Mexico Oil Conservation Division (NMOCD) via Notification of Release (NOR) on December 13, 2024 and subsequently submitted an Initial C-141 Application (C-141) on December 17, 2024. The release was assigned Incident Number nAPP2434828618.

**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). Results from the characterization desktop review are presented below. Potential Site receptors are identified on Figure 1.

Depth to groundwater at the Site is estimated to be less than 50 feet below ground surface (bgs) based on nearest groundwater well data. The closest permitted well with depth to groundwater data is a New Mexico Office of State Engineer (OSE) permitted well CP-01891 POD 1, located approximately 0.13 miles northwest of the Site. CP-01891 POD 1 was drilled utilizing hollow stem auger method for determination of regional depth to groundwater on October 26, 2021. The well has a reported depth to groundwater of 33.2 feet bgs and a total depth of 55 feet bgs. The soil boring was plugged following the OSE approved plugging plan. The referenced well record and log is included in Appendix A.

The closest continuously flowing or significant watercourse to the Site is an emergent wetland, located approximately 524 feet northwest 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 underlain by unstable geology (medium 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

## **SITE ASSESSMENT AND LINER INSPECTION ACTIVITIES**

On December 20, 2024, Ensolum personnel visited the Site to evaluate the release extent based on information provided on the C-141 and visual observations of the release. The release extent was mapped utilizing a handheld Global Positioning System (GPS) unit. The lined containment was cleaned of all debris, power washed and a 48-hour advance notice of the liner inspection was submitted on December 18, 2024. On December 20, 2024, the lined containment was inspected by Ensolum personnel and was determined to be operating as designed. Upon inspection, no rips, tears, holes, or damage were observed. The liner was determined to be sufficient, and all released fluids within the lined containment had been recovered. A site map of the liner is included in Figure 2. Photographic documentation of the inspection is included in Appendix B.

## **SURFACE SCRAPING AND DELINEATION SOIL SAMPLING ACTIVITIES**

On February 26 and February 27, 2025, Ensolum personnel returned to the site to oversee surface scraping and conducted delineation activities. Surface scraping of visibly stained soil was conducted in the release area to the maximum extent possible. Seven delineation soil samples, SS01 through SS07, were collected from a depth of approximately 0.5 feet bgs around the release to assess the lateral extent. Additionally, two boreholes, BH01 and BH02, were advanced via hand auger within the release extent. Surface scraping activities were performed utilizing hand tools, as no mechanical equipment could access the impacted soil due to active production structures, surface pipelines, and engineered facility equipment. Following surface scraping activities, Ensolum personnel collected 5-point composite soil samples representing no more than 200 square feet from the accessible areas of the release. The 5-point composite soil samples were collected by placing five equivalent aliquots of soil into a 1-gallon, resealable plastic bag and homogenizing the samples by thoroughly mixing. Confirmation soil samples CS01 through CS08 were collected from the pad surface from a depth of 0.5 feet bgs. The soil samples

XTO Energy, Inc  
Deferral Request  
BEU DI 29 Pad



were field screened for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID) and chloride utilizing Hach® chloride QuanTab® test strips. Photographic documentation is included in Appendix B. Field screening results and observations for the boreholes were logged on lithologic/soil sampling logs, which are included in Appendix C. The release extent, delineation soil sample, and confirmation soil sample locations are depicted in Figure 2.

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 under strict chain-of-custody procedures to Cardinal Laboratories (Cardinal) in Hobbs, New Mexico, for analysis of the following contaminants of concern (COCs): 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 Standard Methods SM4500.

## LABORATORY ANALYTICAL RESULTS

Laboratory analytical results for delineation soil samples, SS01 through SS07, collected around the release extent from a depth of 0.5 feet bgs indicated all COCs were in compliance with Site Closure Criteria, successfully defining the lateral extent of the release. Laboratory analytical results for delineation soil samples BH01 and BH02, collected at depths ranging from 0.5 feet to 1-foot bgs, indicated all COCs were in compliance with Site Closure Criteria. Laboratory analytical results for confirmation soil samples CS01 through CS03, and CS06 indicated all COCs were in compliance with Closure Criteria. Confirmation soil samples CS04, CS05, CS07, and CS08 indicated TPH and/or chloride concentrations that exceeded Closure Criteria. Laboratory analytical results are summarized in Table 1 and the complete laboratory analytical reports are included as Appendix D.

## DEFERRAL REQUEST

XTO is requesting deferral of final remediation due to the presence of active production structures, surface pipelines, and engineered facility equipment preventing excavation of impacted soil in the vicinity of CS03, CS04, CS07, and CS08. The impacted soil is limited to the area below active production equipment, where remediation would require a major facility deconstruction. The impacted soil remaining in place is delineated vertically by delineation soil samples BH01 and BH02, collected at 1-foot bgs. The soil is laterally defined by delineation soil samples SS01 through SS07. The estimated area of impacted soil left in place immediately adjacent to active production equipment measures approximately 1,640 square feet and a total of approximately 61 cubic yards of impacted soil remains in place.

XTO does not believe deferral will result in imminent risk to human health, the environment, or groundwater. Depth to groundwater was determined to be less than 50 feet but the impacts are estimated to be greater than 30 feet above groundwater. Gross impacts were removed during surface scraping activities and the impacted soil remaining in place is limited in areal and vertical extent.

Based on the presence of active production equipment within the release area and the complete lateral and vertical delineation of impacted soil remaining in place, XTO requests deferral of final remediation for Incident Number nAPP2434828618 until final reclamation of the well pad or major construction, whichever comes first.

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

XTO Energy, Inc  
Deferral Request  
BEU DI 29 Pad



Sincerely,  
**Ensolum, LLC**

A handwritten signature in black ink, appearing to read "Tracy Hillard".

Tracy Hillard  
Project Engineer

A handwritten signature in black ink, appearing to read "Tacoma Morrissey".

Tacoma Morrissey  
Associate Principal

cc: Robert Woodall, XTO  
Kaylan Dirkx, XTO  
BLM  
SLO

Appendices:

Figure 1	Site Receptor Map
Figure 2	Soil Sample Locations
Figure 3	Area of Requested Deferral
Table 1	Soil Sample Analytical Results
Appendix A	Referenced Well Records
Appendix B	Photographic Log
Appendix C	Lithologic Soil Sampling Logs
Appendix D	Laboratory Analytical Reports & Chain-of-Custody Documentation





FIGURES

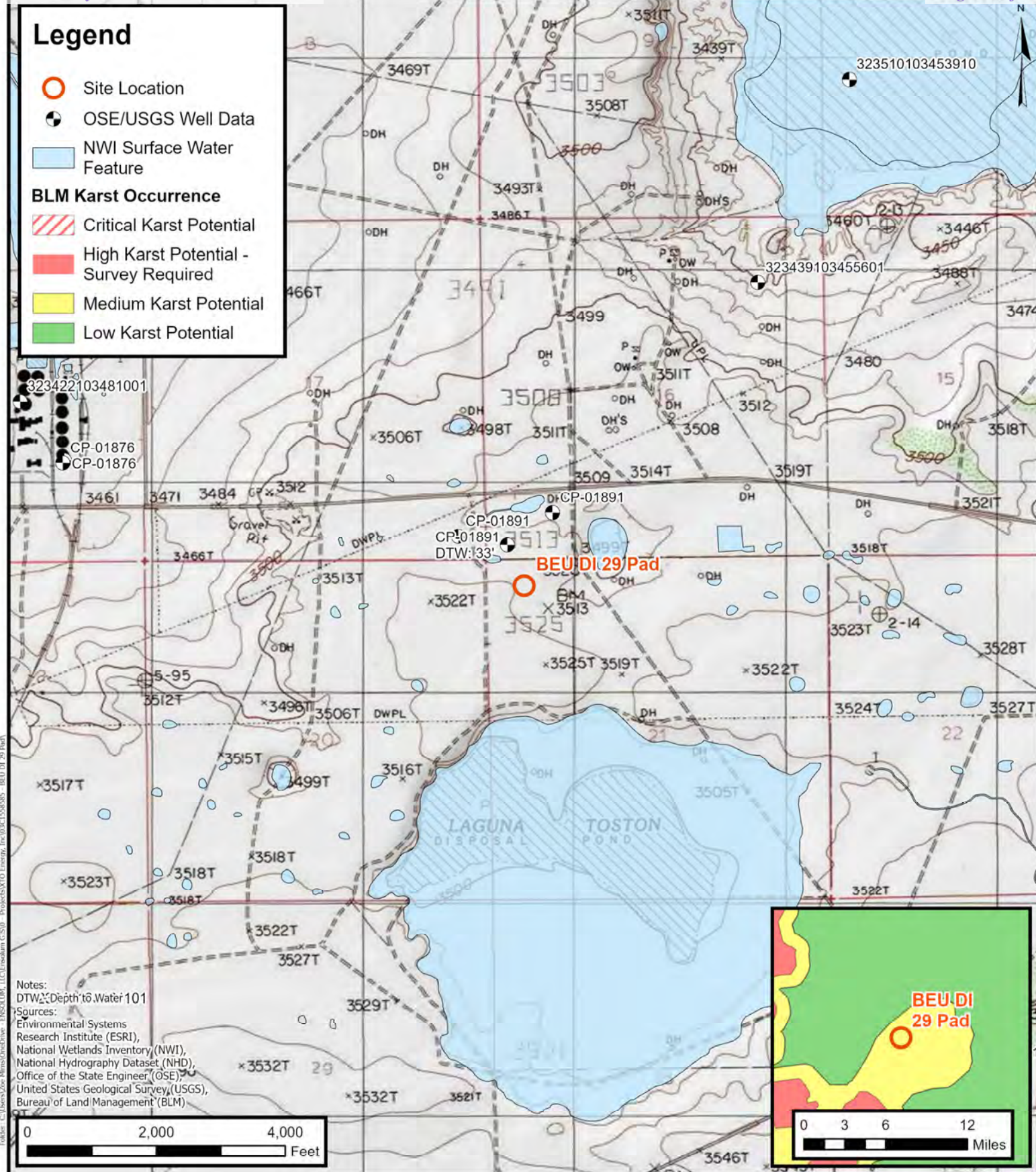
# Legend

- Site Location
- OSE/USGS Well Data

■ NWI Surface Water Feature

## BLM Karst Occurrence

- ▨ Critical Karst Potential
- High Karst Potential - Survey Required
- Medium Karst Potential
- Low Karst Potential



## Site Receptor Map

XTO Energy, Inc  
BEU DI 29 Pad  
Incident Number: nAPP2434828618  
Unit D, Section 21, T 20S, R 32E  
Lea County, New Mexico

FIGURE

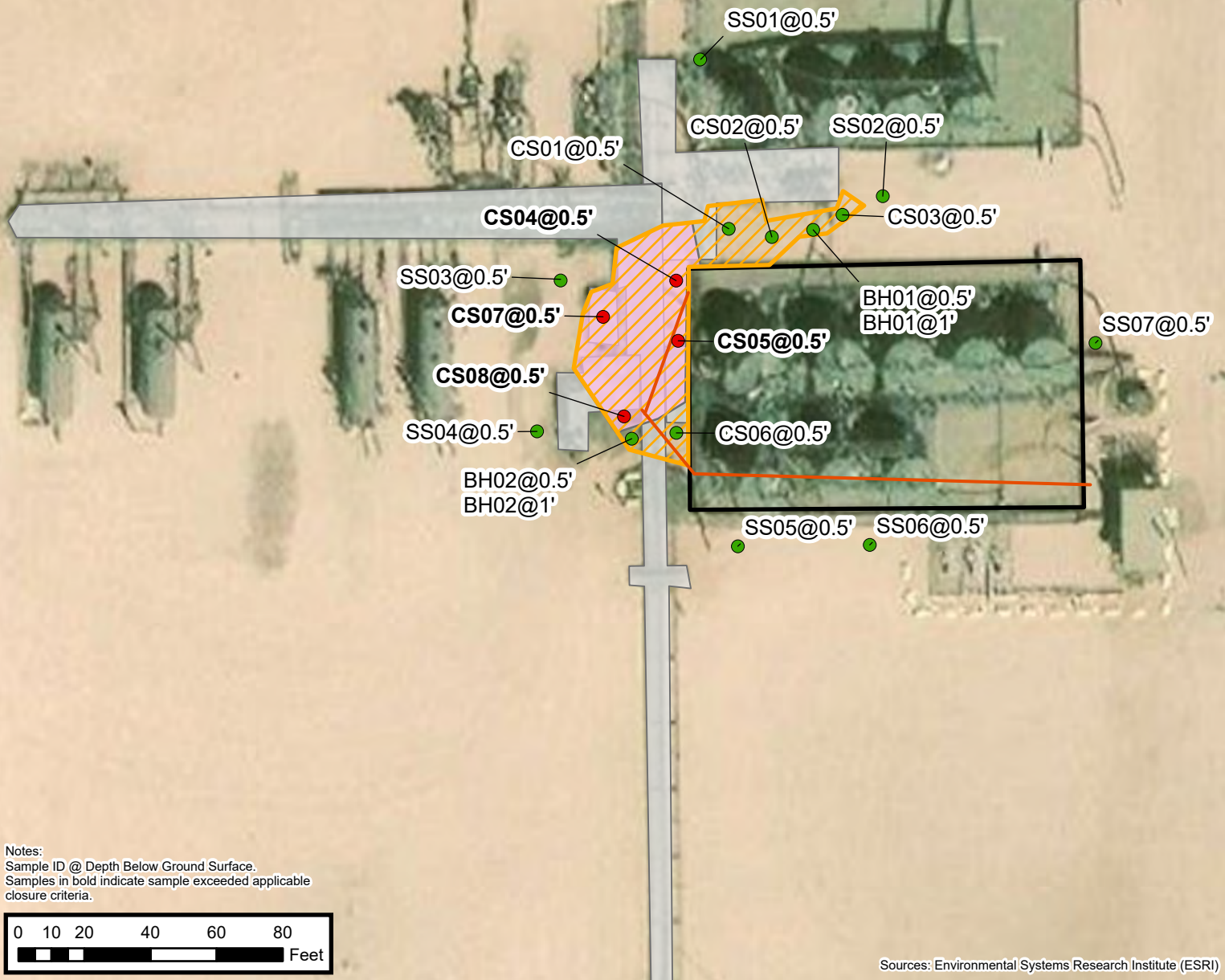
1





**Legend**

- Soil Samples in Compliance with Closure Criteria
- Confirmation Soil Samples Not in Compliance with Closure Criteria
- Electric Utility Line
- ▨ Release Extent
- ▭ Liner Containment Area
- ▭ Requested Area of Deferral
- ▭ Production Equipment

**Soil Sample Locations**

XTO Energy, Inc  
 BEU DI 29 Pad  
 Incident Number: nAPP2434828618  
 Unit D, Section 21, T 20S, R 32E  
 Lea County, New Mexico

**FIGURE****2**



TABLES



**TABLE 1**  
**SOIL SAMPLE ANALYTICAL RESULTS**  
**BEU DI 29 PAD**  
**XTO Energy, Inc**  
**Eddy County, New Mexico**

Sample I.D.	Sample Date	Sample Depth (feet bgs)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)	TPH ORO (mg/kg)	GRO+DRO (mg/kg)	Total TPH (mg/kg)	Chloride (mg/kg)
NMOCD Table I Closure Criteria (NMAC 19.15.29)			10	50	NE	NE	NE	NE	100	600
<b>Delineation Soil Samples</b>										
SS01	02/27/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	336
SS02	02/27/2025	0.5	<0.050	<0.300	<10.0	12.7	<10.0	12.7	12.7	64.0
SS03	02/27/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	96.0
SS04	02/27/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	96.0
SS05	02/27/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	80.0
SS06	02/27/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	96.0
SS07	02/27/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	224
BH01	02/26/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	112
BH01	02/26/2025	1	<0.050	<0.300	<10.0	13.5	<10.0	13.5	13.5	96.0
BH03	02/26/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	160
BH03	02/26/2025	1	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	160
<b>Confirmation Soil Samples</b>										
CS01	02/26/2025	0.5	<0.050	<0.300	<10.0	22.8	<10.0	22.8	22.8	80.0
CS02	02/26/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	64.0
CS03	02/27/2025	0.5	<0.050	<0.300	<10.0	300	52.7	<10.0	<10.0	128
CS04	02/27/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	<b>5,040</b>
CS05	02/27/2025	0.5	<0.050	16.6	441	3,440	476	3,881	<b>4,357</b>	<b>992</b>
CS06	02/27/2025	0.5	<0.050	<0.300	<10.0	41.8	<10.0	41.8	41.8	208
CS07	02/27/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	<b>2,040</b>
CS08	02/27/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	<b>6,100</b>

## Notes:

bgs: below ground surface

mg/kg: milligrams per kilogram

NMOCD: New Mexico Oil Conservation Division

BTEX: Benzene, Toluene, Ethylbenzene, and Xylenes

Concentrations in **bold** exceed the NMOCD Table I Closure Criteria or reclamation requirement where applicable.

GRO: Gasoline Range Organics

DRO: Diesel Range Organics

ORO: Oil Range Organics

TPH: Total Petroleum Hydrocarbon

NMAC: New Mexico Administrative Code

Grey text indicates soil sample removed during excavation activities



## APPENDIX A

### Referenced Well Records

---





# 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 NO. (WELL NO.) POD1 (BH-01)		WELL TAG ID NO. n/a		OSE FILE NO(S). CP-1891			
	WELL OWNER NAME(S) XTO Energy (Adrian Baker)				PHONE (OPTIONAL)			
	WELL OWNER MAILING ADDRESS 6401 Holiday Hill Dr.				CITY Midland	STATE TX	ZIP 79707	
	WELL LOCATION (FROM GPS)	DEGREES 32		MINUTES 33	SECONDS 59.48	N		
		LONGITUDE 103		46	41.34	W		
* ACCURACY REQUIRED: ONE TENTH OF A SECOND * DATUM REQUIRED: WGS 84								
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS - PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE SE SE Unit M Sec16 T20S R32E, NMPM								
2. DRILLING & CASING INFORMATION	LICENSE NO. 1249		NAME OF LICENSED DRILLER Jackie D. Atkins			NAME OF WELL DRILLING COMPANY Atkins Engineering Associates, Inc.		
	DRILLING STARTED 10/26/2021		DRILLING ENDED 10/26/2021		DEPTH OF COMPLETED WELL (FT) temporary well material	BORE HOLE DEPTH (FT) 55	DEPTH WATER FIRST ENCOUNTERED (FT) ±33	
	COMPLETED WELL IS: <input type="checkbox"/> ARTESIAN <input type="checkbox"/> DRY HOLE <input checked="" type="checkbox"/> SHALLOW (UNCONFINED)					STATIC WATER LEVEL IN COMPLETED WELL (FT) 33.20		
	DRILLING FLUID: <input type="checkbox"/> AIR <input type="checkbox"/> MUD ADDITIVES - SPECIFY:							
	DRILLING METHOD: <input type="checkbox"/> ROTARY <input type="checkbox"/> HAMMER <input type="checkbox"/> CABLE TOOL <input checked="" type="checkbox"/> OTHER - SPECIFY: Hollow Stem Auger							
	DEPTH (feet bgl)		BORE HOLE DIAM. (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)	CASING CONNECTION TYPE (add coupling diameter)	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)	SLOT SIZE (inches)
	FROM	TO						
	0	55	±8.5	Boring- HSA	--	--	--	--
3. ANNULAR MATERIAL	DEPTH (feet bgl)		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL	AMOUNT (cubic feet)	METHOD OF PLACEMENT		
	FROM	TO						

FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 06/30/17)

FILE NO. <b>CP-1891</b>	POD NO. <b>1</b>	TRN NO. <b>709444</b>
LOCATION <b>20S.32E.14.333</b>	WELL TAG ID NO. <b>---</b>	PAGE 1 OF 2

4. HYDROGEOLOGIC LOG OF WELL	DEPTH (feet bgl)		THICKNESS (feet)	COLOR AND TYPE OF MATERIAL ENCOUNTERED - INCLUDE WATER-BEARING CAVITIES OR FRACTURE ZONES (attach supplemental sheets to fully describe all units)	WATER BEARING? (YES / NO)	ESTIMATED YIELD FOR WATER- BEARING ZONES (gpm)
	FROM	TO				
	0	4	4	Caliche, Mod. Consolidated, Tan, Dry	Y    ✓ N	
	4	8	4	Sand, fine-very grained, poorly graded, Brown, moist	Y    ✓ N	
	8	16	8	Sand, fine-very grained, poorly graded, with gravel Pinkish Brown, moist	Y    ✓ N	
	16	20	4	Sand, fine-very grained, poorly graded, with clayey gravel, Light Brown, moist	Y    ✓ N	
	20	26	6	Clayey Sand, very fine grained, poorly graded, caliche gravel, Tan , moist	Y    ✓ N	
	26	36	10	Clayey Sand, med-fine grained, poorly graded, caliche gravel, Brown , moist	✓ Y    N	
	36	49	13	Sandstone, mod consolidated, with increasing clay Reddish Brown, Moist	✓ Y    N	
	49	55	6	Claystone, low plasticity, cohesive, Dark Brown, moist	✓ Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
METHOD USED TO ESTIMATE YIELD OF WATER-BEARING STRATA:					TOTAL ESTIMATED WELL YIELD (gpm):	
<input type="checkbox"/> PUMP <input type="checkbox"/> AIR LIFT <input type="checkbox"/> BAILER <input type="checkbox"/> OTHER - SPECIFY:					0.00	

5. TEST; RIG SUPERVISION	WELL TEST	TEST RESULTS - ATTACH A COPY OF DATA COLLECTED DURING WELL TESTING, INCLUDING DISCHARGE METHOD, START TIME, END TIME, AND A TABLE SHOWING DISCHARGE AND DRAWDOWN OVER THE TESTING PERIOD.
	MISCELLANEOUS INFORMATION: Temporary well materials removed and the soil boring plugged using Type I/II neat cement from total depth to surface with augers as tremie. Logs adapted from WSP on-site geologist.	
	PRINT NAME(S) OF DRILL RIG SUPERVISOR(S) THAT PROVIDED ONSITE SUPERVISION OF WELL CONSTRUCTION OTHER THAN LICENSEE: Shane Eldridge	

6. SIGNATURE	THE UNDERSIGNED HEREBY CERTIFIES THAT, TO THE BEST OF HIS OR HER KNOWLEDGE AND BELIEF, THE FOREGOING IS A TRUE AND CORRECT RECORD OF THE ABOVE DESCRIBED HOLE AND THAT HE OR SHE WILL FILE THIS WELL RECORD WITH THE STATE ENGINEER AND THE PERMIT HOLDER WITHIN 30 DAYS AFTER COMPLETION OF WELL DRILLING:	
	 SIGNATURE OF DRILLER / PRINT SIGNEE NAME	Jackie D. Atkins DATE

FOR OSE INTERNAL USE

WR-20 WELL RECORD &amp; LOG (Version 06/30/2017)

FILE NO.	POD NO.	TRN NO.
LOCATION	WELL TAG ID NO.	PAGE 2 OF 2



## APPENDIX B

### Photographic Log

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**Photographic Log**

XTO Energy, Inc

BEU DI 29 Pad

nAPP2434828618



Photograph: 1  
Description: Well sign  
View: East

Date: 12/20/2024



Photograph: 2  
Description: Liner inspection activities  
View: East

Date: 12/20/2024



Photograph: 3  
Description: Liner inspection activities  
View: West

Date: 12/20/2024



Photograph: 4  
Description: Overspray area  
View: East

Date: 12/20/2024

**Photographic Log**

XTO Energy, Inc

BEU DI 29 Pad

nAPP2434828618



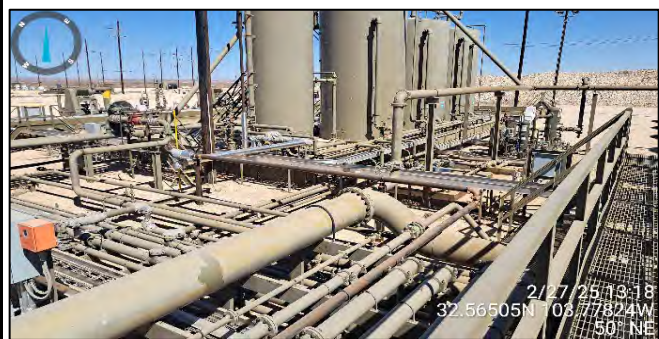
Photograph: 5                      Date: 2/26/2025  
Description: Surface scrape and delineation activities  
View: South



Photograph: 6                      Date: 2/26/2025  
Description: Surface scrape and delineation activities  
View: Southeast



Photograph: 7                      Date: 2/27/2025  
Description: Surface scrape and delineation activities  
View: East



Photograph: 8                      Date: 2/27/2025  
Description: Surface scrape and delineation activities  
View: Northeast


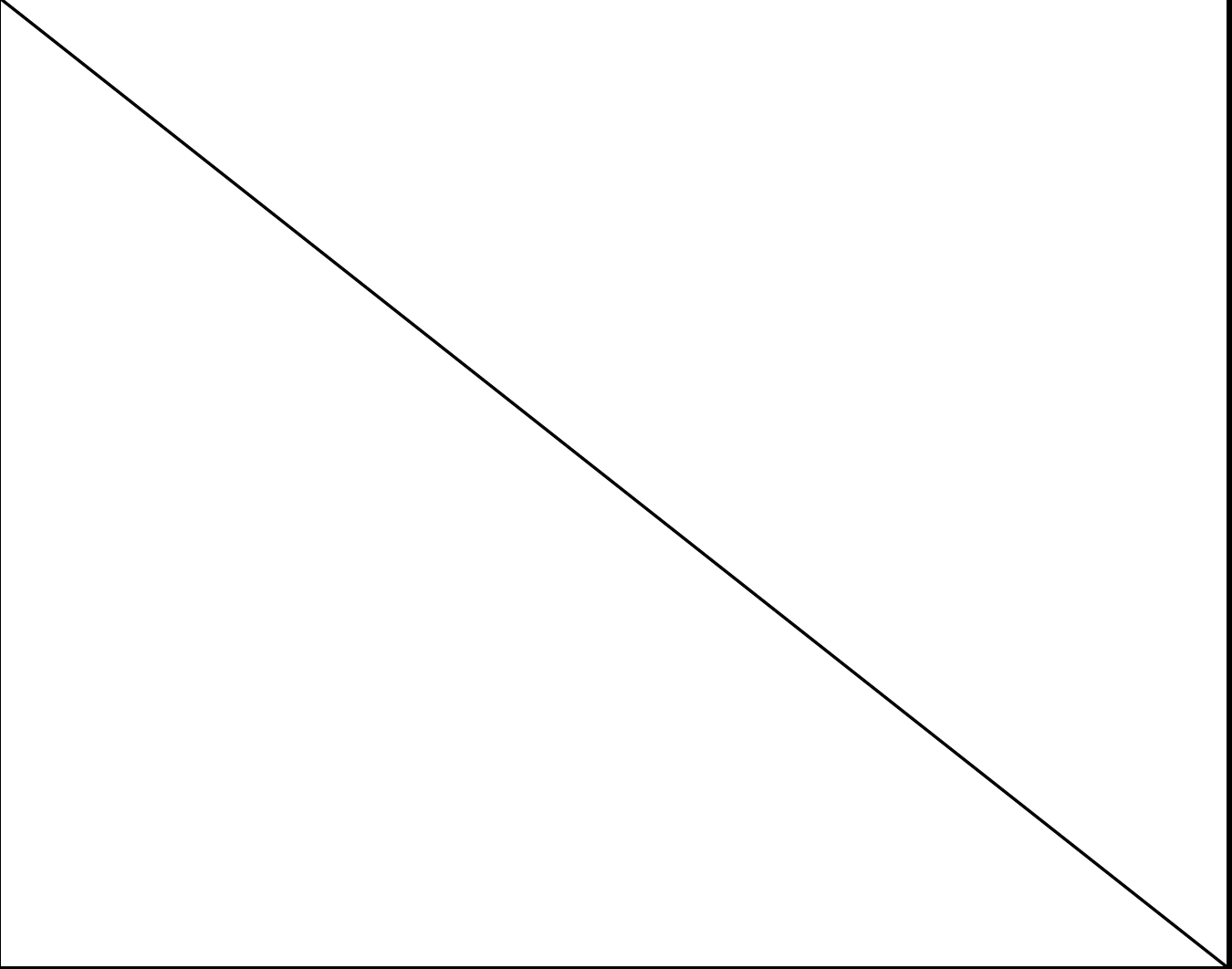



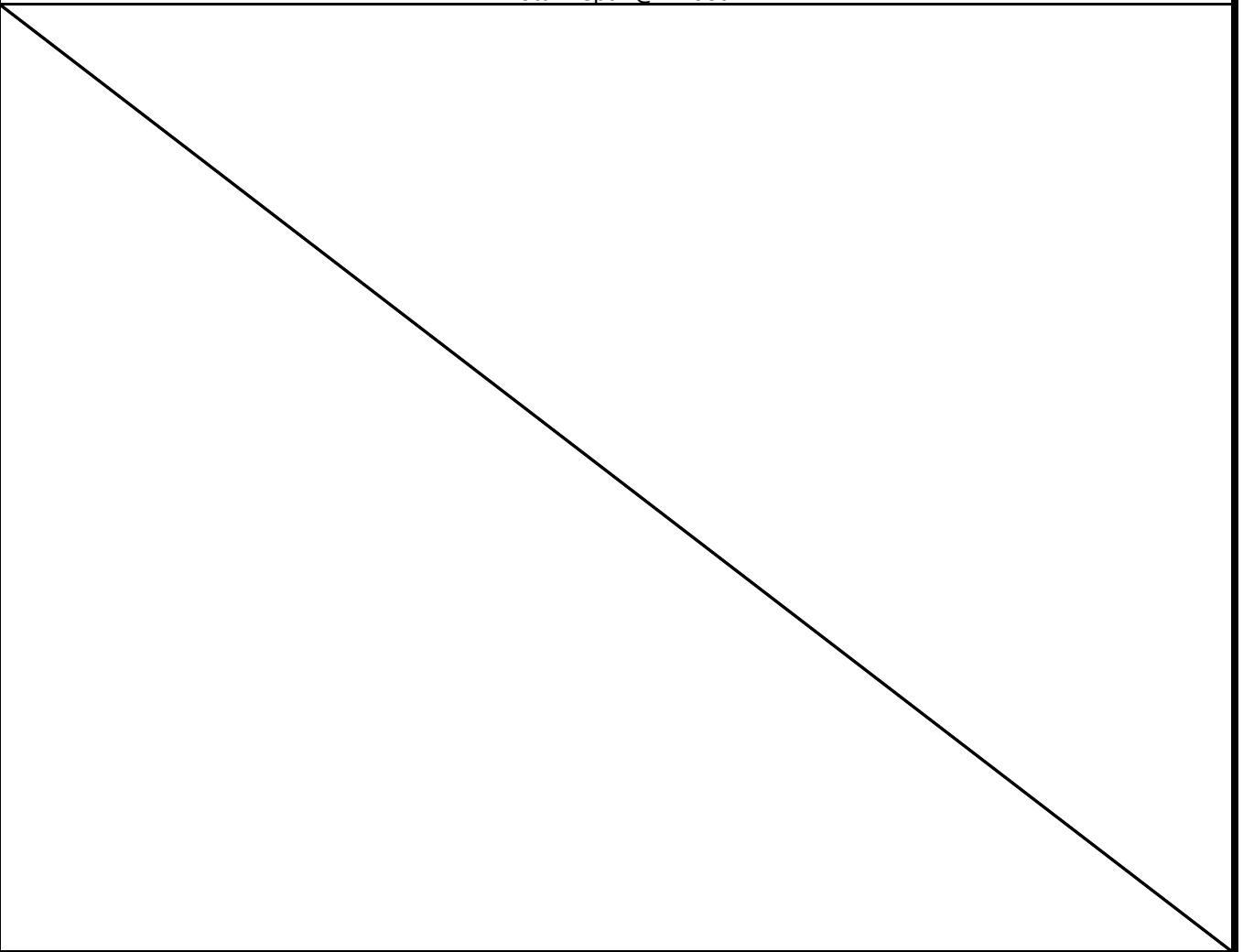
## APPENDIX C

### Lithologic Soil Sampling Logs

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								Sample Name: BH01		Date: 02/26/2025			
								Site Name: BEU DI 29 Pad					
								Incident Number: nAPP2434828618					
								Job Number: 03C1558585					
<b>LITHOLOGIC / SOIL SAMPLING LOG</b>								Logged By: Evan Roe		Method: Hand Auger			
Coordinates: 32.565023, -103.778007								Hole Diameter: 3.5 inch		Total Depth: 1-foot			
Comments: Field screening conducted with HACH Chloride Test Strips and PID for chloride and vapor, respectively. Chloride test performed with 1:4 dilution factor of soil to distilled water. A 40% Correction Factor for chloride is included													
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions					
Dry	<162	0.6	N	BH01	0.5	0	CCHE	(0-1') CALICHE, light brown and tan, fine grained, uniform, no staining, no odor					
Dry	<162	0.1	N	BH01A	1	1							
Total Depth @ 1-foot													
													

								Sample Name: BH02		Date: 02/26/2025	
								Site Name: BEU DI 29 Pad			
								Incident Number: nAPP2434828618			
								Job Number: 03C1558585			
<b>LITHOLOGIC / SOIL SAMPLING LOG</b>								Logged By: Evan Roe		Method: Hand Auger	
Coordinates: 32.564851, -103.778187								Hole Diameter: 3.5 inch		Total Depth: 1-foot	
Comments: Field screening conducted with HACH Chloride Test Strips and PID for chloride and vapor, respectively. Chloride test performed with 1:4 dilution factor of soil to distilled water. A 40% Correction Factor for chloride is included											
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions			
Dry	196	0.5	N	BH02	0.5	0	SP-SM	(0-0.5') SILTY SAND, brown, fine, uniform, trace caliche, no odor			
Dry	162	0.0	N	BH02A	1	1	CCHE	(0.5-1') CALICHE, tan, fine, uniform, no odor			
Total Depth @ 1-foot											
											



## APPENDIX D

### Laboratory Analytical Reports & Chain of Custody Documentation

---



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

---

February 28, 2025

TRACY HILLARD

ENSOLUM, LLC

705 W WADLEY AVE.

MIDLAND, TX 79705

RE: BEU DI 29 PCA

Enclosed are the results of analyses for samples received by the laboratory on 02/27/25 14:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM, LLC  
 TRACY HILLARD  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 02/27/2025  
 Reported: 02/28/2025  
 Project Name: BEU DI 29 PCA  
 Project Number: 03C1558585  
 Project Location: XTO 32.56479, -103.77798

Sampling Date: 02/26/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: BH 03 .5 (H251170-01)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/27/2025	ND	1.94	97.0	2.00	2.25	
Toluene*	<0.050	0.050	02/27/2025	ND	2.01	100	2.00	1.32	
Ethylbenzene*	<0.050	0.050	02/27/2025	ND	2.01	100	2.00	0.732	
Total Xylenes*	<0.150	0.150	02/27/2025	ND	6.16	103	6.00	1.14	
Total BTEX	<0.300	0.300	02/27/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 107 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	160	16.0	02/28/2025	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/27/2025	ND	199	99.5	200	0.357	
DRO >C10-C28*	<10.0	10.0	02/27/2025	ND	196	98.1	200	1.71	
EXT DRO >C28-C36	<10.0	10.0	02/27/2025	ND					

Surrogate: 1-Chlorooctane 99.4 % 48.2-134

Surrogate: 1-Chlorooctadecane 104 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM, LLC  
 TRACY HILLARD  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 02/27/2025  
 Reported: 02/28/2025  
 Project Name: BEU DI 29 PCA  
 Project Number: 03C1558585  
 Project Location: XTO 32.56479, -103.77798

Sampling Date: 02/26/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: BH 03 1 (H251170-02)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	02/27/2025	ND	1.94	97.0	2.00	2.25		
Toluene*	<0.050	0.050	02/27/2025	ND	2.01	100	2.00	1.32		
Ethylbenzene*	<0.050	0.050	02/27/2025	ND	2.01	100	2.00	0.732		
Total Xylenes*	<0.150	0.150	02/27/2025	ND	6.16	103	6.00	1.14		
Total BTEx	<0.300	0.300	02/27/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 108 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	160	16.0	02/28/2025	ND	416	104	400	3.77	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/27/2025	ND	199	99.5	200	0.357	
DRO >C10-C28*	<10.0	10.0	02/27/2025	ND	196	98.1	200	1.71	
EXT DRO >C28-C36	<10.0	10.0	02/27/2025	ND					

Surrogate: 1-Chlorooctane 107 % 48.2-134

Surrogate: 1-Chlorooctadecane 112 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager





PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM, LLC  
 TRACY HILLARD  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 02/27/2025  
 Reported: 02/28/2025  
 Project Name: BEU DI 29 PCA  
 Project Number: 03C1558585  
 Project Location: XTO 32.56479, -103.77798

Sampling Date: 02/26/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: BH 01 .5 (H251170-03)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	02/27/2025	ND	1.94	97.0	2.00	2.25		
Toluene*	<0.050	0.050	02/27/2025	ND	2.01	100	2.00	1.32		
Ethylbenzene*	<0.050	0.050	02/27/2025	ND	2.01	100	2.00	0.732		
Total Xylenes*	<0.150	0.150	02/27/2025	ND	6.16	103	6.00	1.14		
Total BTEX	<0.300	0.300	02/27/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 108 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	02/28/2025	ND	416	104	400	3.77	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/27/2025	ND	199	99.5	200	0.357	
DRO >C10-C28*	<10.0	10.0	02/27/2025	ND	196	98.1	200	1.71	
EXT DRO >C28-C36	<10.0	10.0	02/27/2025	ND					

Surrogate: 1-Chlorooctane 98.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 101 % 49.1-148

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM, LLC  
 TRACY HILLARD  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 02/27/2025  
 Reported: 02/28/2025  
 Project Name: BEU DI 29 PCA  
 Project Number: 03C1558585  
 Project Location: XTO 32.56479, -103.77798

Sampling Date: 02/26/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: BH 01 1 (H251170-04)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/27/2025	ND	1.94	97.0	2.00	2.25	
Toluene*	<0.050	0.050	02/27/2025	ND	2.01	100	2.00	1.32	
Ethylbenzene*	<0.050	0.050	02/27/2025	ND	2.01	100	2.00	0.732	
Total Xylenes*	<0.150	0.150	02/27/2025	ND	6.16	103	6.00	1.14	
Total BTEX	<0.300	0.300	02/27/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 109 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	02/28/2025	ND	416	104	400	3.77	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/28/2025	ND	199	99.5	200	0.357	
DRO >C10-C28*	13.5	10.0	02/28/2025	ND	196	98.1	200	1.71	
EXT DRO >C28-C36	<10.0	10.0	02/28/2025	ND					

Surrogate: 1-Chlorooctane 95.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 98.6 % 49.1-148

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM, LLC  
 TRACY HILLARD  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 02/27/2025  
 Reported: 02/28/2025  
 Project Name: BEU DI 29 PCA  
 Project Number: 03C1558585  
 Project Location: XTO 32.56479, -103.77798

Sampling Date: 02/26/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: CS 01 .5 (H251170-05)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	02/27/2025	ND	1.94	97.0	2.00	2.25		
Toluene*	<0.050	0.050	02/27/2025	ND	2.01	100	2.00	1.32		
Ethylbenzene*	<0.050	0.050	02/27/2025	ND	2.01	100	2.00	0.732		
Total Xylenes*	<0.150	0.150	02/27/2025	ND	6.16	103	6.00	1.14		
Total BTEX	<0.300	0.300	02/27/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 107 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	80.0	16.0	02/28/2025	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/28/2025	ND	199	99.5	200	0.357	
DRO >C10-C28*	22.8	10.0	02/28/2025	ND	196	98.1	200	1.71	
EXT DRO >C28-C36	<10.0	10.0	02/28/2025	ND					

Surrogate: 1-Chlorooctane 99.6 % 48.2-134

Surrogate: 1-Chlorooctadecane 102 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM, LLC  
 TRACY HILLARD  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 02/27/2025  
 Reported: 02/28/2025  
 Project Name: BEU DI 29 PCA  
 Project Number: 03C1558585  
 Project Location: XTO 32.56479, -103.77798

Sampling Date: 02/26/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: CS 02 .5 (H251170-06)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	02/27/2025	ND	1.94	97.0	2.00	2.25		
Toluene*	<0.050	0.050	02/27/2025	ND	2.01	100	2.00	1.32		
Ethylbenzene*	<0.050	0.050	02/27/2025	ND	2.01	100	2.00	0.732		
Total Xylenes*	<0.150	0.150	02/27/2025	ND	6.16	103	6.00	1.14		
Total BTEX	<0.300	0.300	02/27/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 107 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	02/28/2025	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/28/2025	ND	199	99.5	200	0.357	
DRO >C10-C28*	<10.0	10.0	02/28/2025	ND	196	98.1	200	1.71	
EXT DRO >C28-C36	<10.0	10.0	02/28/2025	ND					

Surrogate: 1-Chlorooctane 105 % 48.2-134

Surrogate: 1-Chlorooctadecane 108 % 49.1-148

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



---

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---

### Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

---

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A handwritten signature in black ink, appearing to read "C. D. Keene", is written over a horizontal line.

Celey D. Keene, Lab Director/Quality Manager





101 East Marland, Hobbs, NM 88240  
(575) 393-2326 FAX (575) 393-2476

# CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: Ensolum, LLC		<b>BILL TO</b>		<b>ANALYSIS REQUEST</b>	
Project Manager: Tracy Hillard		P.O. #:			
Address: 601 N Marientfield Street, Suite 400		Company: XTO Energy, Inc			
City: Midland		Attn: Cotton Brown			
Phone #: 575-937-3906		Address: 3104 E Greene St			
State: TX Zip: 79701		City: Carlsbad			
Project #: 036   558585		State: NM Zip: 88220			
Project Name: BETA D1 29 Feb		Phone #:			
Project Location: 32.56474, -103.77748		Fax #:			
Sampler Name: Evan Rae					

Lab I.D.	Sample I.D.	Depth (feet)	MATRIX						PRESERV.		SAMPLING		TPH 8015	BTEX 8021	Chloride 4500		
			(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL				OTHER :	DATE
AB517D	134C3	.5		1									2/24/25	1025			
	13403	.5		1									2/24/25	1035			
	13401	.5		1									2/26/25	1225			
	13401	.5		1									2/26/25	1232			
	13401	.5		1									2/26/25	1240			
	13401	.5		1									2/26/25	1430			

Delivered By: (Circle One)	Observed Temp. °C	Sample Condition	CHECKED BY: (Initials)	Turnaround Time:	Standard	Bacteria (only)	Sample Condition
Sampler - UPS - Bus - Other:	Corrected Temp. °C	Cool Intact <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Thermometer ID	#140 Rush	Cool Intact <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Observed Temp. °C
				Correction Factor	0.5°C		Corrected Temp. °C

REMARKS: All Results are emailed. Please provide Email address: Bhillard@ensolum.com, TMorrissey@ensolum.com, THillard@ensolum.com

Verbal Result: ☐ Yes ☐ No Add'l Phone #:





PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

---

March 03, 2025

TRACY HILLARD

ENSOLUM, LLC

705 W WADLEY AVE.

MIDLAND, TX 79705

RE: BEU DI 29 PAD

Enclosed are the results of analyses for samples received by the laboratory on 02/28/25 9:40.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Mike Snyder". The signature is fluid and cursive, with the first name "Mike" and last name "Snyder" clearly distinguishable.

Mike Snyder For Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM, LLC  
 TRACY HILLARD  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 02/28/2025  
 Reported: 03/03/2025  
 Project Name: BEU DI 29 PAD  
 Project Number: 03C1558585  
 Project Location: XTO - 32.56429-103.77798

Sampling Date: 02/27/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Alyssa Parras

**Sample ID: CS 03 .5' (H251211-01)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/28/2025	ND	1.86	92.9	2.00	0.511	
Toluene*	<0.050	0.050	02/28/2025	ND	1.93	96.7	2.00	0.460	
Ethylbenzene*	<0.050	0.050	02/28/2025	ND	2.01	100	2.00	1.11	
Total Xylenes*	<0.150	0.150	02/28/2025	ND	6.14	102	6.00	1.32	
Total BTEX	<0.300	0.300	02/28/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 110 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	128	16.0	02/28/2025	ND	464	116	400	7.14	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/28/2025	ND	206	103	200	3.50	
DRO >C10-C28*	300	10.0	02/28/2025	ND	205	103	200	2.17	
EXT DRO >C28-C36	52.7	10.0	02/28/2025	ND					

Surrogate: 1-Chlorooctane 92.6 % 71.8-148

Surrogate: 1-Chlorooctadecane 102 % 63.9-155

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\*=Accredited Analyte

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

ENSOLUM, LLC  
 TRACY HILLARD  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 02/28/2025  
 Reported: 03/03/2025  
 Project Name: BEU DI 29 PAD  
 Project Number: 03C1558585  
 Project Location: XTO - 32.56429-103.77798

Sampling Date: 02/27/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Alyssa Parras

**Sample ID: CS 04 .5' (H251211-02)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/28/2025	ND	1.86	92.9	2.00	0.511	
Toluene*	<0.050	0.050	02/28/2025	ND	1.93	96.7	2.00	0.460	
Ethylbenzene*	<0.050	0.050	02/28/2025	ND	2.01	100	2.00	1.11	
Total Xylenes*	<0.150	0.150	02/28/2025	ND	6.14	102	6.00	1.32	
Total BTEX	<0.300	0.300	02/28/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 110 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	5040	16.0	02/28/2025	ND	464	116	400	7.14		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/28/2025	ND	206	103	200	3.50	
DRO >C10-C28*	<10.0	10.0	02/28/2025	ND	205	103	200	2.17	
EXT DRO >C28-C36	<10.0	10.0	02/28/2025	ND					

Surrogate: 1-Chlorooctane 105 % 71.8-148

Surrogate: 1-Chlorooctadecane 106 % 63.9-155

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

ENSOLUM, LLC  
 TRACY HILLARD  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 02/28/2025  
 Reported: 03/03/2025  
 Project Name: BEU DI 29 PAD  
 Project Number: 03C1558585  
 Project Location: XTO - 32.56429-103.77798

Sampling Date: 02/27/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Alyssa Parras

**Sample ID: CS 05 .5' (H251211-03)**

BTEx 8021B		mg/kg	Analyzed By: JH					S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/28/2025	ND	1.86	92.9	2.00	0.511	
Toluene*	1.93	0.050	02/28/2025	ND	1.93	96.7	2.00	0.460	
Ethylbenzene*	3.33	0.050	02/28/2025	ND	2.01	100	2.00	1.11	
Total Xylenes*	11.3	0.150	02/28/2025	ND	6.14	102	6.00	1.32	
Total BTEX	16.6	0.300	02/28/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 145 % 71.5-134

Chloride, SM4500Cl-B		mg/kg	Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	992	16.0	02/28/2025	ND	464	116	400	7.14	

TPH 8015M		mg/kg	Analyzed By: MS					S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	441	10.0	02/28/2025	ND	206	103	200	3.50	
DRO >C10-C28*	3440	10.0	02/28/2025	ND	205	103	200	2.17	
EXT DRO >C28-C36	476	10.0	02/28/2025	ND					

Surrogate: 1-Chlorooctane 137 % 71.8-148

Surrogate: 1-Chlorooctadecane 168 % 63.9-155

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

ENSOLUM, LLC  
 TRACY HILLARD  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 02/28/2025  
 Reported: 03/03/2025  
 Project Name: BEU DI 29 PAD  
 Project Number: 03C1558585  
 Project Location: XTO - 32.56429-103.77798

Sampling Date: 02/27/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Alyssa Parras

**Sample ID: CS 06 .5' (H251211-04)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/28/2025	ND	1.86	92.9	2.00	0.511	
Toluene*	<0.050	0.050	02/28/2025	ND	1.93	96.7	2.00	0.460	
Ethylbenzene*	<0.050	0.050	02/28/2025	ND	2.01	100	2.00	1.11	
Total Xylenes*	<0.150	0.150	02/28/2025	ND	6.14	102	6.00	1.32	
Total BTEX	<0.300	0.300	02/28/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 117 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	208	16.0	02/28/2025	ND	464	116	400	7.14		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/28/2025	ND	206	103	200	3.50	
DRO >C10-C28*	41.8	10.0	02/28/2025	ND	205	103	200	2.17	
EXT DRO >C28-C36	<10.0	10.0	02/28/2025	ND					

Surrogate: 1-Chlorooctane 85.1 % 71.8-148

Surrogate: 1-Chlorooctadecane 86.2 % 63.9-155

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

ENSOLUM, LLC  
 TRACY HILLARD  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 02/28/2025  
 Reported: 03/03/2025  
 Project Name: BEU DI 29 PAD  
 Project Number: 03C1558585  
 Project Location: XTO - 32.56429-103.77798

Sampling Date: 02/27/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Alyssa Parras

**Sample ID: CS 07 .5' (H251211-05)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	02/28/2025	ND	1.86	92.9	2.00	0.511		
Toluene*	<0.050	0.050	02/28/2025	ND	1.93	96.7	2.00	0.460		
Ethylbenzene*	<0.050	0.050	02/28/2025	ND	2.01	100	2.00	1.11		
Total Xylenes*	<0.150	0.150	02/28/2025	ND	6.14	102	6.00	1.32		
Total BTEX	<0.300	0.300	02/28/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 121 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	2040	16.0	02/28/2025	ND	464	116	400	7.14		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/28/2025	ND	206	103	200	3.50	
DRO >C10-C28*	<10.0	10.0	02/28/2025	ND	205	103	200	2.17	
EXT DRO >C28-C36	<10.0	10.0	02/28/2025	ND					

Surrogate: 1-Chlorooctane 99.0 % 71.8-148

Surrogate: 1-Chlorooctadecane 99.3 % 63.9-155

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager





PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM, LLC  
 TRACY HILLARD  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 02/28/2025  
 Reported: 03/03/2025  
 Project Name: BEU DI 29 PAD  
 Project Number: 03C1558585  
 Project Location: XTO - 32.56429-103.77798

Sampling Date: 02/27/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Alyssa Parras

**Sample ID: CS 08 .5' (H251211-06)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/28/2025	ND	1.86	92.9	2.00	0.511	
Toluene*	<0.050	0.050	02/28/2025	ND	1.93	96.7	2.00	0.460	
Ethylbenzene*	<0.050	0.050	02/28/2025	ND	2.01	100	2.00	1.11	
Total Xylenes*	<0.150	0.150	02/28/2025	ND	6.14	102	6.00	1.32	
Total BTEX	<0.300	0.300	02/28/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 112 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	6100	16.0	02/28/2025	ND	464	116	400	7.14		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/28/2025	ND	206	103	200	3.50	
DRO >C10-C28*	<10.0	10.0	02/28/2025	ND	205	103	200	2.17	
EXT DRO >C28-C36	<10.0	10.0	02/28/2025	ND					

Surrogate: 1-Chlorooctane 97.1 % 71.8-148

Surrogate: 1-Chlorooctadecane 97.6 % 63.9-155

Cardinal Laboratories

\*=Accredited Analyte

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

- S-04            The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
- QM-07        The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
- ND            Analyte NOT DETECTED at or above the reporting limit
- RPD          Relative Percent Difference
- \*\*            Samples not received at proper temperature of 6°C or below.
- \*\*\*          Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
- Samples reported on an as received basis (wet) unless otherwise noted on report

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A handwritten signature in black ink, appearing to read "Mike Snyder".

Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



101 East Marland, Hobbs, NM 88240  
(575) 393-2326 FAX (575) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: Ensolum, LLC

Project Manager: Tracy Hillard

Address: 601 N Marientfield Street, Suite 400

City: Midland

Phone #: 575-937-3906

Project #: 031558565

Project Name: BEU D1 2.5 Pcd

Project Location: 32.56428, -103.77798

Sample Name: Even Rec

FOR LAB USE ONLY

Lab I.D.

Sample I.D.

Depth (feet)

1051811

15003

15004

15005

15006

15007

15008

15009

15010

15011

15012

15013

15014

15015

15016

15017

15018

15019

15020

15021

15022

(G)RAB OR (C)OMP.

# CONTAINERS

GROUNDWATER

WASTEWATER

SOIL

OIL

SLUDGE

OTHER :

ACID/BASE:

ICE / COOL

OTHER :

DATE

TIME

TPH 8015

BTEX 8021

Chloride 4500

BILL TO

P.O. #:

Company: XTO Energy, Inc

Attn: Colton Brown

Address: 3104 E Greene St

City: Carlsbad

State: NM Zip: 88220

Phone #:

Fax #:

ANALYSIS REQUEST

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Relinquished By: Even Rec

Date: 02-28-25

Time: 0810

Received By: [Signature]

Date: 02-28-25

Time: 0810

Relinquished By: [Signature]

Date: 02-28-25

Time: 0810

Received By: [Signature]

Date: 02-28-25

Time: 0810

Received By: [Signature]

Date: 02-28-25

Time: 0810

Received By: [Signature]

Date: 02-28-25

Time: 0810

Received By: [Signature]

Date: 02-28-25

Time: 0810

Received By: [Signature]

Date: 02-28-25

Time: 0810

Received By: [Signature]

Date: 02-28-25

Delivered By: (Circle One)

Sample - UPS - Bus - Other:

Observed Temp. °C

Corrected Temp. °C

Sample Condition

Cool Intact

CHECKED BY: [Signature]

Initials

Turnaround Time:

Thermometer ID

Standard

Rush

Bacteria (only)

Cool Intact

Sample Condition

Observed Temp. °C

Corrected Temp. °C

Observed Temp. °C

Corrected Temp. °C

Observed Temp. °C

† Cardinal cannot accept verbal changes. Please email changes to celey.keene@cardinallabsnm.com



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

---

March 03, 2025

TRACY HILLARD

ENSOLUM, LLC

705 W WADLEY AVE.

MIDLAND, TX 79705

RE: BEU DI 29 PAD

Enclosed are the results of analyses for samples received by the laboratory on 02/28/25 9:40.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Mike Snyder". The signature is fluid and cursive, with the first name "Mike" and last name "Snyder" clearly distinguishable.

Mike Snyder For Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM, LLC  
 TRACY HILLARD  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 02/28/2025  
 Reported: 03/03/2025  
 Project Name: BEU DI 29 PAD  
 Project Number: 03C1558585  
 Project Location: XTO - 32.56429-103.77798

Sampling Date: 02/27/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Alyssa Parras

**Sample ID: SS 01 .5 (H251212-01)**

BTX 8021B			mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	02/28/2025	ND	1.86	92.9	2.00	0.511		
Toluene*	<0.050	0.050	02/28/2025	ND	1.93	96.7	2.00	0.460		
Ethylbenzene*	<0.050	0.050	02/28/2025	ND	2.01	100	2.00	1.11		
Total Xylenes*	<0.150	0.150	02/28/2025	ND	6.14	102	6.00	1.32		
Total BTX	<0.300	0.300	02/28/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 120 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	336	16.0	02/28/2025	ND	464	116	400	7.14		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/28/2025	ND	206	103	200	3.50	
DRO >C10-C28*	<10.0	10.0	02/28/2025	ND	205	103	200	2.17	
EXT DRO >C28-C36	<10.0	10.0	02/28/2025	ND					

Surrogate: 1-Chlorooctane 95.3 % 71.8-148

Surrogate: 1-Chlorooctadecane 95.1 % 63.9-155

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\*=Accredited Analyte

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

ENSOLUM, LLC  
 TRACY HILLARD  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 02/28/2025  
 Reported: 03/03/2025  
 Project Name: BEU DI 29 PAD  
 Project Number: 03C1558585  
 Project Location: XTO - 32.56429-103.77798

Sampling Date: 02/27/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Alyssa Parras

**Sample ID: SS 02 .5 (H251212-02)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	02/28/2025	ND	1.86	92.9	2.00	0.511		
Toluene*	<0.050	0.050	02/28/2025	ND	1.93	96.7	2.00	0.460		
Ethylbenzene*	<0.050	0.050	02/28/2025	ND	2.01	100	2.00	1.11		
Total Xylenes*	<0.150	0.150	02/28/2025	ND	6.14	102	6.00	1.32		
Total BTEX	<0.300	0.300	02/28/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 116 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	02/28/2025	ND	432	108	400	7.69	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/28/2025	ND	206	103	200	3.50	
DRO >C10-C28*	12.7	10.0	02/28/2025	ND	205	103	200	2.17	
EXT DRO >C28-C36	<10.0	10.0	02/28/2025	ND					

Surrogate: 1-Chlorooctane 100 % 71.8-148

Surrogate: 1-Chlorooctadecane 102 % 63.9-155

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager





PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM, LLC  
 TRACY HILLARD  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 02/28/2025  
 Reported: 03/03/2025  
 Project Name: BEU DI 29 PAD  
 Project Number: 03C1558585  
 Project Location: XTO - 32.56429-103.77798

Sampling Date: 02/27/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Alyssa Parras

**Sample ID: SS 03 .5 (H251212-03)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	03/01/2025	ND	1.80	89.9	2.00	3.31	
Toluene*	<0.050	0.050	03/01/2025	ND	1.92	96.0	2.00	2.50	
Ethylbenzene*	<0.050	0.050	03/01/2025	ND	1.89	94.7	2.00	2.80	
Total Xylenes*	<0.150	0.150	03/01/2025	ND	5.55	92.5	6.00	2.45	
Total BTEX	<0.300	0.300	03/01/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 94.7 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	02/28/2025	ND	432	108	400	7.69	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/28/2025	ND	214	107	200	5.09	
DRO >C10-C28*	<10.0	10.0	02/28/2025	ND	200	99.8	200	4.75	
EXT DRO >C28-C36	<10.0	10.0	02/28/2025	ND					

Surrogate: 1-Chlorooctane 92.5 % 71.8-148

Surrogate: 1-Chlorooctadecane 88.8 % 63.9-155

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

ENSOLUM, LLC  
 TRACY HILLARD  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 02/28/2025  
 Reported: 03/03/2025  
 Project Name: BEU DI 29 PAD  
 Project Number: 03C1558585  
 Project Location: XTO - 32.56429-103.77798

Sampling Date: 02/27/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Alyssa Parras

**Sample ID: SS 04 .5 (H251212-04)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	03/01/2025	ND	1.80	89.9	2.00	3.31		
Toluene*	<0.050	0.050	03/01/2025	ND	1.92	96.0	2.00	2.50		
Ethylbenzene*	<0.050	0.050	03/01/2025	ND	1.89	94.7	2.00	2.80		
Total Xylenes*	<0.150	0.150	03/01/2025	ND	5.55	92.5	6.00	2.45		
Total BTEX	<0.300	0.300	03/01/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 94.9 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	96.0	16.0	02/28/2025	ND	432	108	400	7.69		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/28/2025	ND	214	107	200	5.09	
DRO >C10-C28*	<10.0	10.0	02/28/2025	ND	200	99.8	200	4.75	
EXT DRO >C28-C36	<10.0	10.0	02/28/2025	ND					

Surrogate: 1-Chlorooctane 89.1 % 71.8-148

Surrogate: 1-Chlorooctadecane 86.2 % 63.9-155

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

ENSOLUM, LLC  
 TRACY HILLARD  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 02/28/2025  
 Reported: 03/03/2025  
 Project Name: BEU DI 29 PAD  
 Project Number: 03C1558585  
 Project Location: XTO - 32.56429-103.77798

Sampling Date: 02/27/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Alyssa Parras

**Sample ID: SS 05 .5 (H251212-05)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	03/01/2025	ND	1.80	89.9	2.00	3.31	
Toluene*	<0.050	0.050	03/01/2025	ND	1.92	96.0	2.00	2.50	
Ethylbenzene*	<0.050	0.050	03/01/2025	ND	1.89	94.7	2.00	2.80	
Total Xylenes*	<0.150	0.150	03/01/2025	ND	5.55	92.5	6.00	2.45	
Total BTEX	<0.300	0.300	03/01/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 96.5 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	02/28/2025	ND	432	108	400	7.69	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/28/2025	ND	214	107	200	5.09	
DRO >C10-C28*	<10.0	10.0	02/28/2025	ND	200	99.8	200	4.75	
EXT DRO >C28-C36	<10.0	10.0	02/28/2025	ND					

Surrogate: 1-Chlorooctane 88.3 % 71.8-148

Surrogate: 1-Chlorooctadecane 84.8 % 63.9-155

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\*=Accredited Analyte

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

ENSOLUM, LLC  
 TRACY HILLARD  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 02/28/2025  
 Reported: 03/03/2025  
 Project Name: BEU DI 29 PAD  
 Project Number: 03C1558585  
 Project Location: XTO - 32.56429-103.77798

Sampling Date: 02/27/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Alyssa Parras

**Sample ID: SS 06 .5 (H251212-06)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	03/01/2025	ND	1.80	89.9	2.00	3.31	
Toluene*	<0.050	0.050	03/01/2025	ND	1.92	96.0	2.00	2.50	
Ethylbenzene*	<0.050	0.050	03/01/2025	ND	1.89	94.7	2.00	2.80	
Total Xylenes*	<0.150	0.150	03/01/2025	ND	5.55	92.5	6.00	2.45	
Total BTEX	<0.300	0.300	03/01/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 94.6 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	96.0	16.0	02/28/2025	ND	432	108	400	7.69		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/28/2025	ND	214	107	200	5.09	
DRO >C10-C28*	<10.0	10.0	02/28/2025	ND	200	99.8	200	4.75	
EXT DRO >C28-C36	<10.0	10.0	02/28/2025	ND					

Surrogate: 1-Chlorooctane 92.6 % 71.8-148

Surrogate: 1-Chlorooctadecane 90.2 % 63.9-155

Cardinal Laboratories

\*=Accredited Analyte

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM, LLC  
 TRACY HILLARD  
 705 W WADLEY AVE.  
 MIDLAND TX, 79705  
 Fax To:

Received: 02/28/2025  
 Reported: 03/03/2025  
 Project Name: BEU DI 29 PAD  
 Project Number: 03C1558585  
 Project Location: XTO - 32.56429-103.77798

Sampling Date: 02/27/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Alyssa Parras

**Sample ID: SS 07 .5 (H251212-07)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	03/01/2025	ND	1.80	89.9	2.00	3.31		
Toluene*	<0.050	0.050	03/01/2025	ND	1.92	96.0	2.00	2.50		
Ethylbenzene*	<0.050	0.050	03/01/2025	ND	1.89	94.7	2.00	2.80		
Total Xylenes*	<0.150	0.150	03/01/2025	ND	5.55	92.5	6.00	2.45		
Total BTEX	<0.300	0.300	03/01/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 95.2 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	224	16.0	02/28/2025	ND	432	108	400	7.69		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/28/2025	ND	214	107	200	5.09	
DRO >C10-C28*	<10.0	10.0	02/28/2025	ND	200	99.8	200	4.75	
EXT DRO >C28-C36	<10.0	10.0	02/28/2025	ND					

Surrogate: 1-Chlorooctane 94.6 % 71.8-148

Surrogate: 1-Chlorooctadecane 92.3 % 63.9-155

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\*=Accredited Analyte

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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### Notes and Definitions

QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

---

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A handwritten signature in black ink, appearing to read "Mike Snyder", is written over a horizontal line.

Mike Snyder For Celey D. Keene, Lab Director/Quality Manager





101 East Marland, Hobbs, NM 88240  
(575) 393-2326 FAX (575) 393-2476

### CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]

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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 512675

QUESTIONS

Operator:  XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:  5380
	Action Number:  512675
	Action Type:  [C-141] Deferral Request C-141 (C-141-v-Deferral)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2434828618
Incident Name	NAPP2434828618 BEU DI 29 PAD @ D-21-20S-32E
Incident Type	Produced Water Release
Incident Status	Deferral Request Received

Location of Release Source	
Please answer all the questions in this group.	
Site Name	BEU DI 29 PAD
Date Release Discovered	12/10/2024
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	Cause: Equipment Failure   Dump Valve   Crude Oil   Released: 1 BBL   Recovered: 0 BBL   Lost: 1 BBL.
Produced Water Released (bbls) Details	Cause: Equipment Failure   Dump Valve   Produced Water   Released: 8 BBL   Recovered: 8 BBL   Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	No
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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QUESTIONS, Page 2

Action 512675

**QUESTIONS (continued)**

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 512675
	Action Type: [C-141] Deferral Request C-141 (C-141-v-Deferral)

**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: Robert Woodall Title: Environmental Analyst Email: <a href="mailto:robert.d.woodall@exxonmobil.com">robert.d.woodall@exxonmobil.com</a> Date: 10/06/2025
--	---

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QUESTIONS, Page 3

Action 512675

**QUESTIONS (continued)**

Operator:  XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:
	5380
	Action Number: 512675
Action Type: [C-141] Deferral Request C-141 (C-141-v-Deferral)	

**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 26 and 50 (ft.)
What method was used to determine the depth to ground water	OCD Imaging Records Lookup
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 ½ and 1 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1000 (ft.) and ½ (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 300 and 500 (ft.)
A subsurface mine	Between 1 and 5 (mi.)
An (non-karst) unstable area	Zero feet, overlying, or within area
Categorize the risk of this well / site being in a karst geology	None
A 100-year floodplain	Greater than 5 (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	No
<b>Soil Contamination Sampling:</b> (Provide the highest observable value for each, in milligrams per kilograms.)	
Chloride (EPA 300.0 or SM4500 Cl B)	6100
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	4357
GRO+DRO (EPA SW-846 Method 8015M)	3881
BTEX (EPA SW-846 Method 8021B or 8260B)	16.6
Benzene (EPA SW-846 Method 8021B or 8260B)	0
<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	12/20/2024
On what date will (or did) the final sampling or liner inspection occur	10/02/2025
On what date will (or was) the remediation complete(d)	10/02/2025
What is the estimated surface area (in square feet) that will be reclaimed	2488
What is the estimated volume (in cubic yards) that will be reclaimed	77
What is the estimated surface area (in square feet) that will be remediated	2488
What is the estimated volume (in cubic yards) that will be remediated	77
<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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QUESTIONS, Page 4

Action 512675

**QUESTIONS (continued)**

Operator:  XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:  5380
	Action Number:  512675
	Action Type:  [C-141] Deferral Request C-141 (C-141-v-Deferral)

**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>	
(Ex Situ) Excavation and <b>off-site</b> disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for <b>off-site</b> disposal	fEEM0112334510 HALFWAY DISPOSAL AND LANDFILL
<b>OR</b> which OCD approved well (API) will be used for <b>off-site</b> disposal	Not answered.
<b>OR</b> is the <b>off-site</b> disposal site, to be used, out-of-state	Not answered.
<b>OR</b> is the <b>off-site</b> disposal site, to be used, an NMED facility	Not answered.
(Ex Situ) Excavation and <b>on-site</b> remediation (i.e. On-Site Land Farms)	Not answered.
(In Situ) Soil Vapor Extraction	Not answered.
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	Not answered.
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	Not answered.
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	Not answered.
Ground Water Abatement pursuant to 19.15.30 NMAC	Not answered.
OTHER (Non-listed remedial process)	Not answered.
<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: Robert Woodall Title: Environmental Analyst Email: robert.d.woodall@exxonmobil.com Date: 10/06/2025
<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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QUESTIONS, Page 5

Action 512675

**QUESTIONS (continued)**

Operator:  XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:  5380
	Action Number:  512675
	Action Type:  [C-141] Deferral Request C-141 (C-141-v-Deferral)

**QUESTIONS**

<b>Deferral Requests Only</b>	
<i>Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.</i>	
Requesting a deferral of the remediation closure due date with the approval of this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Is the remaining contamination in areas immediately under or around production equipment where remediation could cause a major facility deconstruction	Yes
Please list or describe the production equipment and how (re)moving the equipment would cause major facility deconstruction	Surface and subsurface pipelines, power poles, electrical lines, lined containment with tanks
What is the remaining surface area (in square feet) that will still need to be remediated if a deferral is granted	1640
What is the remaining volume (in cubic yards) that will still need to be remediated if a deferral is granted	61
<i>Per Paragraph (2) of Subsection C of 19.15.29.12 NMAC if contamination is located in areas immediately under or around production equipment such as production tanks, wellheads and pipelines where remediation could cause a major facility deconstruction, the remediation, restoration and reclamation may be deferred with division written approval until the equipment is removed during other operations, or when the well or facility is plugged or abandoned, whichever comes first.</i>	
Enter the facility ID (f#) on which this deferral should be granted	fAPP2123046227 BIG EDDY UNIT D129
Enter the well API (30-) on which this deferral should be granted	Not answered.
Contamination does not cause an imminent risk to human health, the environment, or groundwater	True
<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: Robert Woodall Title: Environmental Analyst Email: robert.d.woodall@exxonmobil.com Date: 10/06/2025



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QUESTIONS, Page 6

Action 512675

**QUESTIONS (continued)**

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 512675
	Action Type: [C-141] Deferral Request C-141 (C-141-v-Deferral)

**QUESTIONS**

Sampling Event Information	
Last sampling notification (C-141N) recorded	433815
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	02/28/2025
What was the (estimated) number of samples that were to be gathered	30
What was the sampling surface area in square feet	6000

**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	No
--	----

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CONDITIONS

Action 512675

CONDITIONS

Operator:  XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:  5380
	Action Number:  512675
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CONDITIONS

Created By	Condition	Condition Date
scwells	Deferral approved with the following condition: CS03 is also included in the deferral area as GRO + DRO = 352.7 mg/kg at.5'.	10/9/2025
scwells	Deferral approved. Deferral of CS03 through CS05, CS07 and CS08 is approved until plugging and abandonment or a major facility deconstruction, whichever comes first. A complete and accurate remediation report and/or reclamation report will need to be submitted at that time.	10/9/2025