



November 26, 2025

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

Re: Closure Request
PLU 28 BS West Battery
Incident Number nAPP2530133416
Eddy County, New Mexico

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of XTO Energy, Inc (XTO), has prepared this *Closure Request* to document the findings of a liner integrity inspection conducted at the PLU 28 BS West Battery (Site) following a release of crude oil within a steel lined containment measuring approximately 9,398 square feet. Based on the liner integrity inspection activities, XTO is submitting this *Closure Request*, describing assessment activities that have occurred and requesting no further action and closure for Incident Number nAPP2530133416.

SITE DESCRIPTION AND RELEASE SUMMARY

The Site is located in Unit F, Section 28, Township 25 South, Range 31 East, in Eddy County, New Mexico (32.104438°, -103.786942°) and is associated with oil and gas exploration and production operations on Federal land managed by the Bureau of Land Management (BLM).

On October 25, 2025, an equipment malfunction resulted in the release of approximately 20 barrels (bbls) of crude oil into a lined steel containment measuring approximately 9,398 square feet housing eight crude oil process tanks. A vacuum truck was dispatched to the Site to recover free-standing fluids and all released fluids were recovered. XTO reported the release to the New Mexico Oil Conservation Division (NMOCD) via a Notification of Release (NOR) submitted on October 28, 2025 and subsequently submitted an Initial Release C-141 Form (C-141) on October 29, 2025. The release was assigned Incident Number nAPP2530133416.

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 and potential Site receptors are identified on Figure 1.

Depth to groundwater at the Site is estimated to be greater than 100 feet below ground surface (bgs) based on a recent soil boring drilled for determination of regional groundwater depth. The New Mexico Office of the State Engineer (OSE) soil boring C-4500 POD 1 was drilled 1,055 feet southeast of the Site to a depth of 110 feet bgs March 24, 2025. No groundwater was observed. The OSE Well Record and Log is included in Appendix A.

XTO Energy, Inc
Closure Request
PLU 28 BS West Battery

The closest continuously flowing or significant watercourse to the Site is a seasonal dry wash located approximately 5,551 feet southwest of the Site, the second closest significant watercourse is a continuous seasonal dry wash located 11,656 feet southwest of the Site. The Site is greater than 200 feet from a lakebed, sinkhole, or playa lake and greater than 300 feet from an occupied residence, school, hospital, institution, church, or wetland. The Site is greater than 500 feet to a freshwater well or spring and is not within a 100-year floodplain or overlying a subsurface mine. The Site is not underlain by potentially unstable geology (low potential karst designation area).

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

- Benzene: 10 milligrams per kilogram (mg/kg)
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg
- Total petroleum hydrocarbons (TPH)-gasoline range organics (GRO) and TPH-diesel range organics (DRO): 1,000 mg/kg
- TPH: 2,500 mg/kg
- Chloride: 20,000 mg/kg

LINER INTEGRITY INSPECTION ACTIVITIES

A 48-hour advance notice of the liner inspection was submitted to the NMOCD on October 30, 2025. A liner integrity inspection was conducted by Ensolum personnel on November 1, 2025. The lined containment was cleaned of all debris, power washed, inspected and was determined to be operating as designed. Upon inspection, no rips, tears, holes, or damage was observed. The liner was determined to be sufficient, and all released fluids were recovered. All fluids documented within the photographic log are residual fresh water as the inspection was conducted immediately following cleaning activities. The floor and walls of the lined containment were visible during inspection to determine competency. Photographic documentation of the inspection is included in Appendix B.

CLOSURE REQUEST

Liner integrity inspection activities were conducted following a release of crude oil within a lined containment at the Site. A liner integrity inspection was conducted by Ensolum personnel on November 1, 2025. Upon inspection, no rips, tears, holes, or damage was observed, and the liner was determined to be sufficient. The release was contained laterally and vertically by the steel walls of the lined containment, and the liner was performing as designed. Based on initial response efforts and the liner operating as designed, XTO respectfully requests closure for Incident Number nAPP2530133416.

XTO Energy, Inc
Closure Request
PLU 28 BS West Battery

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

Sincerely,
Ensolum, LLC



Christopher Wright
Associate Geologist



Tacoma Morrissey
Associate Principal

Cc: Robert Woodall, XTO
 Richard Kotzur, XTO
 BLM

Appendices:

- Figure 1 Site Receptor Map
- Figure 2 Site Map
- Appendix A Referenced Well Records
- Appendix B Photographic Log
- Appendix C Spill Volume Calculations



FIGURES

Legend

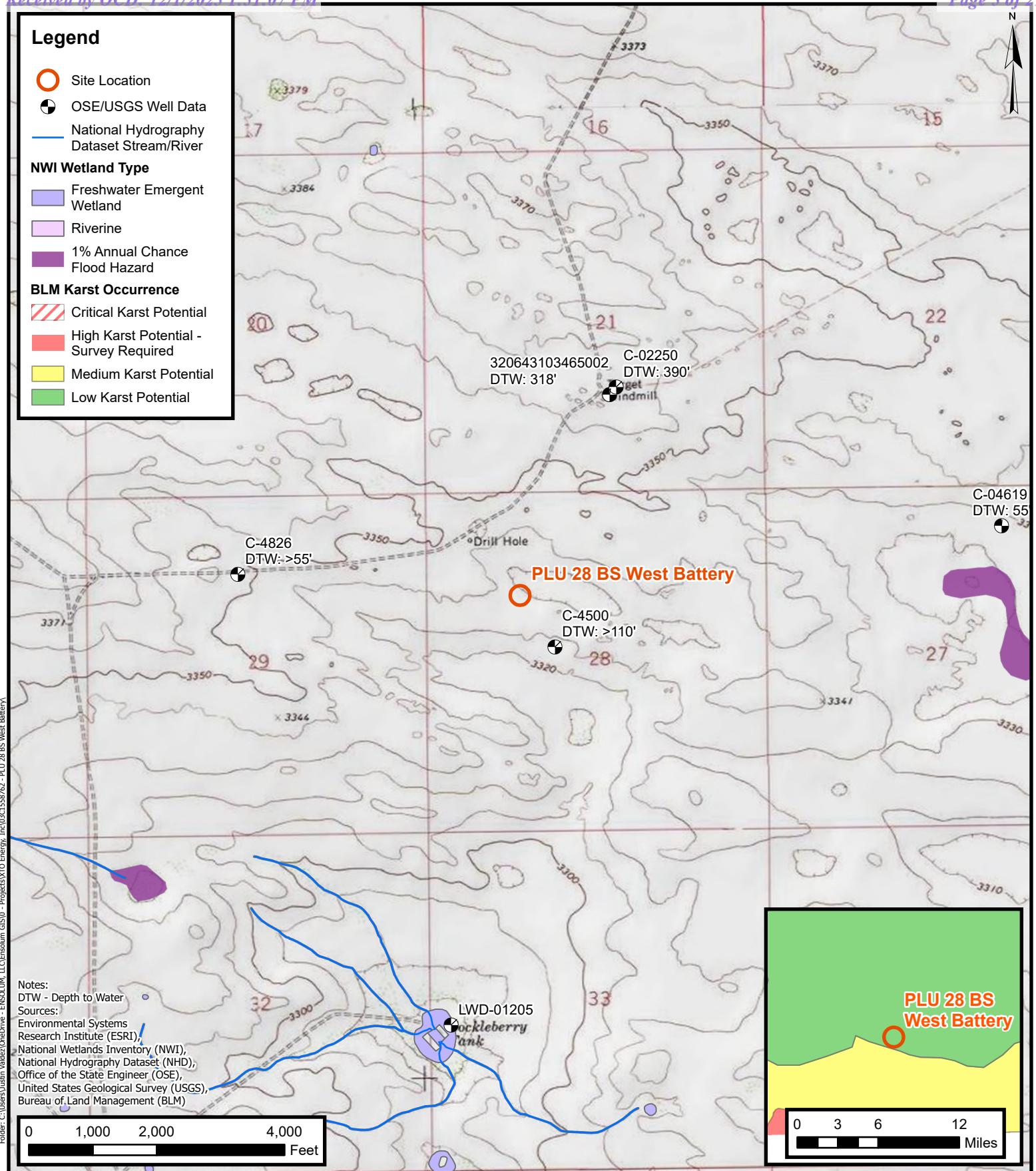
- Site Location
- OSE/USGS Well Data
- National Hydrography Dataset Stream/River

NWI Wetland Type

- Freshwater Emergent Wetland
- Riverine
- 1% Annual Chance Flood Hazard

BLM Karst Occurrence

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

**Site Receptor Map**

XTO Energy, Inc
 PLU 28 BS West Battery
 Incident Number: nAPP2530133416
 Unit F, Sec 28, T25S, R31E
 Eddy County, New Mexico



Environmental, Engineering and
 Hydrogeologic Consultants

FIGURE
1

N

Legend
 Lined Containment


Environmental, Engineering and
Hydrogeologic Consultants

Site Map
XTO Energy, Inc
PLU 28 BS West Battery
Incident Number: nAPP2530133416
Unit F, Sec 28, T25S, R31E
Eddy County, New Mexico

Sources: Environmental Systems Research Institute (ESRI)

FIGURE
2



APPENDIX A

Referenced Well Records



WELL RECORD & LOG
OFFICE OF THE STATE ENGINEER
www.ose.state.nm.us

FOR OSE INTERNAL USE		WR-20 WELL RECORD & LOG (Version 06/30/17)		
FILE NO.	C-4500	POD NO.	1	TRN NO.
LOCATION	Exp 255.31E.28.144	WELL TAG ID NO.	—	PAGE 1 OF 2

FOR OSE INTERNAL USE WR-20 WELL RECORD & LOG (Version 06/30/2017)
FILE NO. C-4500 POD NO. 1 TRN NO. 682534
LOCATION WELL TAG ID NO. PAGE 2 OF 2



APPENDIX B

Photographic Log



Photographic Log

XTO Energy, Inc
PLU 28 BS West Battery
nAPP2530133416



Photograph: 1

Date: 10/25/2025

Description: Initial release

View: East



Photograph: 2

Date: 10/25/2025

Description: Initial release

View: South



Photograph: 3

Date: 10/31/2025

Description: Liner cleaning activities

View: Southeast



Photograph: 4

Date: 11/01/2025

Description: Liner inspection activities

View: East



Photographic Log

XTO Energy, Inc

PLU 28 BS West Battery

Incident ID: nAPP2530133416



Photograph: 5

Date: 11/01/2025

Description: Liner inspection activities

View: Southwest

Photograph: 6

Date: 11/01/2025

Description: Liner inspection activities

View: South



Photograph: 7

Date: 11/01/2025

Description: Liner inspection activities

View: East

Photograph: 8

Date: 11/01/2025

Description: Liner inspection activities

View: West

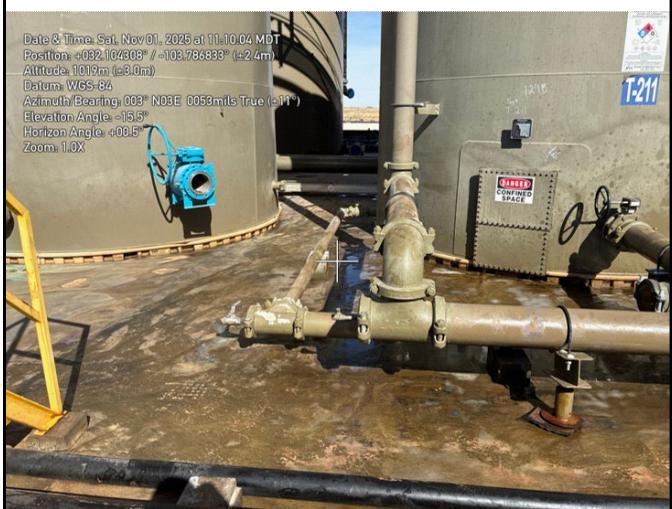
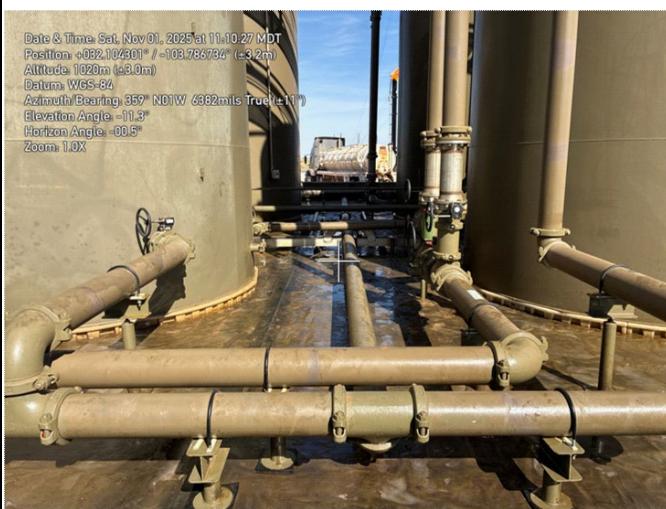


Photographic Log

XTO Energy, Inc

PLU 28 BS West Battery

Incident ID: nAPP2530133416



Photograph: 9

Date: 11/01/2025

Description: Liner inspection activities

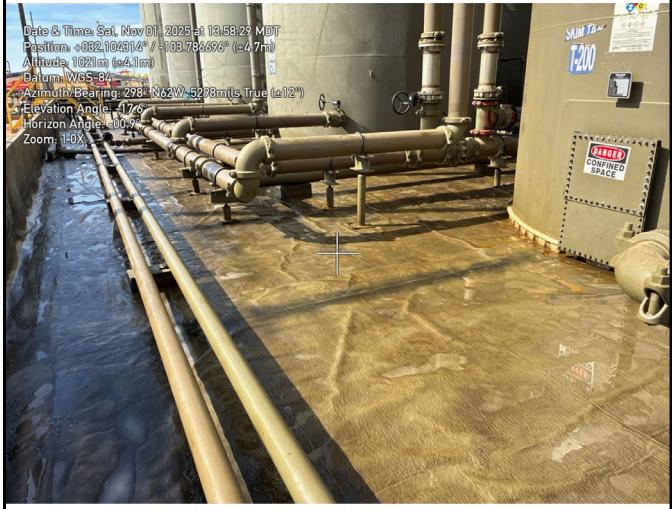
View: North

Photograph: 10

Date: 11/01/2025

Description: Liner inspection activities

View: North



Photograph: 11

Date: 11/01/2025

Description: Liner inspection activities

View: Northeast

Photograph: 12

Date: 11/01/2025

Description: Liner inspection activities

View: Northwest



APPENDIX C

Spill Volume Calculations

Location:	PLU 28 BS West Battery	
Spill Date:	10/25/2025	
Incident #:		
Area 1		
Approximate Area =	9398	sq. ft.
Average Saturation (or depth) of spill =	2.00	inches
Average Porosity Factor =	0.25	
VOLUME OF LEAK		
Total Crude Oil =	20.00	bbls
Total Produced Water =		bbls
Area 2		
Approximate Area =		sq. ft.
Average Saturation (or depth) of spill =		inches
VOLUME OF LEAK		
Total Crude Oil =		bbls
Total Produced Water =		bbls
TOTAL VOLUME OF LEAK		
Total Crude Oil =	20.00	bbls
Total Produced Water =		bbls
TOTAL VOLUME RECOVERED		
Total Crude Oil =	20.00	bbls
Total Produced Water =		bbls

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

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS

Action 530858

QUESTIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 530858
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2530133416
Incident Name	NAPP2530133416 PLU 28 BS WEST BATTERY @ F-28-25S-31E
Incident Type	Oil Release
Incident Status	Remediation Closure Report Received

Location of Release Source*Please answer all the questions in this group.*

Site Name	PLU 28 BS West Battery
Date Release Discovered	10/25/2025
Surface Owner	Federal

Incident Details*Please answer all the questions in this group.*

Incident Type	Oil 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 Line Crude Oil Released: 20 BBL Recovered: 20 BBL Lost: 0 BBL.
Produced Water Released (bbls) Details	Not answered.
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.

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

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS, Page 2

Action 530858

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 530858
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	No
Reasons why this would be considered a submission for a notification of a major release	<i>Unavailable.</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.

Initial Response	
<i>The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury.</i>	
The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
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: Richard Kotzur Title: Senior Project Manager Email: NMEnvNotifications@exxonmobil.com Date: 12/01/2025
--	---

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

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS, Page 3

Action 530858

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 530858
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Site Characterization

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.

What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 1 and 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	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 ½ and 1 (mi.)
Any other fresh water well or spring	Between ½ and 1 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1 and 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Between 1 and 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan

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.

Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	10/25/2025
On what date will (or did) the final sampling or liner inspection occur	11/01/2025
On what date will (or was) the remediation complete(d)	11/01/2025
What is the estimated surface area (in square feet) that will be remediated	9398
What is the estimated volume (in cubic yards) that will be remediated	0

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.

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.

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

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS, Page 4

Action 530858

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 530858
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)

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.

This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:

(Select all answers below that apply.)

Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	Yes
Other Non-listed Remedial Process. Please specify	No impacted soil identified

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 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: Richard Kotzur Title: Senior Project Manager Email: NMEnvNotifications@exxonmobil.com Date: 12/01/2025
--	---

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.

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

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS, Page 6

Action 530858

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 530858
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	521708
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	11/01/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	9398

Remediation Closure Request	
<i>Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.</i>	
Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	9398
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	Liner integrity inspection activities were conducted following a release of produced water and crude oil within a lined containment at the Site. A liner integrity inspection was conducted by Ensolum personnel on November 1, 2025. Upon inspection, no rips, tears, holes, or damage was observed, and the liner was determined to be sufficient. The release was contained laterally and vertically by the lined containment and the liner was performing as designed. Based on initial response efforts and the liner operating as designed, XTO respectfully requests closure for Incident Number nAPP2530133416.

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

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.	
I hereby agree and sign off to the above statement	Name: Richard Kotzur Title: Senior Project Manager Email: NMEnvNotifications@exxonmobil.com Date: 12/01/2025

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

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

CONDITIONS

Action 530858

CONDITIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 530858
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	We have received your Remediation Closure Report for Incident #nAPP2530133416 PLU 28 BS West Battery, thank you. This Remediation Closure Report is approved.	12/29/2025