



December 26, 2025

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

**Re: Remediation Work Plan**  
**PLU 18 TWR West Battery**  
**Incident Number nAPP2510144301**  
**Eddy County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum) on behalf of XTO Energy, Inc. (XTO), has prepared this *Remediation Work Plan (Work Plan)* to document the findings of a liner integrity inspection, delineation, excavation, and soil sampling activities conducted at the PLU 18 TWR West Battery (Site) following a release of crude oil within a 574 square foot steel, lined containment. The containment contains production equipment and piping, a lease automatic custody transfer (LACT) unit, and pumps. The following *Work Plan* describes remediation and soil sampling activities completed and proposes additional delineation.

## **SITE DESCRIPTION AND RELEASE SUMMARY**

The release was originally reported in Unit A, Section 19, Township 24 South, Range 31 East. After review of internal documentation and a Site visit, the release was confirmed to be located in Unit D, Section 19, Township 24 South, Range 31 East in Eddy County, New Mexico (32.20664°, -103.82335°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM).

On April 9, 2025, a valve on a pump was inadvertently left open resulting in the release of 11 barrels (bbls) of crude oil into a lined containment; approximately 8 gallons sprayed east of the lined containment, onto the surface of the pad. A vacuum truck was dispatched to the Site to recover free-standing fluid, 10 bbls of released fluids were recovered. XTO reported the release to the New Mexico Oil Conservation Division (NMOCD) via a Notification of Release (NOR) on and an Initial C-141 Application (C-141) on April 11, 2025. The release was assigned Incident Number nAPP2510144301.

## **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 soil boring drilled for determination of regional groundwater depth. In August 2023, a soil

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boring permitted by New Mexico Office of the State Engineer (C-4759) was completed approximately 0.37 miles northeast of the Site utilizing air rotary drilling method. Soil boring C-4759 was drilled to a depth of 110 feet bgs. A field geologist logged and described soils continuously. No moisture or groundwater was encountered during drilling activities. The temporary well was left open for over 72 hours to allow for potential slow infill of groundwater. After the 72-hour waiting period, without observing groundwater, it was confirmed that groundwater beneath the Site is greater than 110 feet bgs. The borehole was properly abandoned with drill cuttings and hydrated bentonite chips. The Well Record & Log is included in Appendix A.

The closest continuously flowing or significant watercourse to the Site is a seasonal dry wash, located approximately 8,135 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 not underlain by unstable geology (low potential karst designation area).

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

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

## SURFACE SCRAPING AND DELINEATION SOIL SAMPLING ACTIVITIES

On April 10, 2025, Ensolum personnel visited the Site to evaluate the release extent based on information provided on the C-141 and visual observations. The lined containment area and release extent were mapped utilizing a handheld Global Positioning System (GPS) unit and is depicted on Figure 2. Photographic documentation is included in Appendix B.

On May 1, 2025, Ensolum personnel returned to the Site to oversee surface scraping and delineation soil sampling activities. One delineation borehole was advanced via hand auger within the release extent to a terminal depth of 3 feet bgs within the release extent. Discrete delineation soil samples were collected from the borehole at depths ranging from 0.5 feet to 3 feet bgs. The release extent was surface scraped via hand shovels. One 5-point composite confirmation soil sample, CS01, was collected to assess for the presence or absence of impacted soil. On June 24, 2025, Ensolum personnel returned to the Site to collect additional delineation soil samples SS01 through SS04 from ground surface to define the lateral extent of the release. All soil samples collected 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 for the borehole were logged on a lithologic/soil sampling log, which is included in Appendix C. The delineation soil sample locations are depicted on Figure 2.

The delineation and confirmation 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)

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in Hobbs, New Mexico, for analysis of the following contaminants of concern (COCs): BTEX following United States Environmental Protection Agency (EPA) Method 8021B; TPH-GRO, TPH-DRO, and TPH-oil range organics (ORO) following EPA Method 8015M/D; and chloride following Standard Methods SM4500.

Laboratory analytical results for the delineation soil sample BH01, collected from 0.5 feet bgs, indicated Benzene, BTEX, and TPH concentrations exceeded Closure Criteria but soil sample BH01C was in compliance with Closure Criteria at 3 feet bgs. Laboratory analytical results for the confirmation soil sample, CS01, indicated BTEX and TPH concentrations exceeded Closure Criteria at 0.5 feet bgs, indicating additional remediation was needed. Delineation soil samples SS01 through SS04 indicated all COCs were in compliance with reclamation requirements, successfully defining the lateral extent of the release.

## EXCAVATION AND SOIL SAMPLING ACTIVITIES

On June 23, 2025, Ensolum personnel oversaw excavation activities utilizing a backhoe and transport vehicle. The entire overspray area was excavated to approximately 2 feet bgs. Ensolum personnel collected 5-point composite soil samples representing no more than 200 square feet from the floor and sidewall of the excavated area. 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 sample FS01 was collected from the floor of the excavation from a depth of 2 feet bgs. Confirmation soil sample SW01 was collected from the sidewall of the excavation at depths ranging from ground surface to 2 feet bgs. The soil samples were collected, handled, and submitted for the same COCs mentioned above, and were delivered to Cardinal. Photographic documentation of all Site activities is included in Appendix B. The excavation extent and confirmation soil sample locations are depicted in Figure 3.

The final excavation extent measured an estimated 150 square feet. A total of 11 cubic yards of impacted soil were removed during the excavation activities. The impacted soil was transported and properly disposed of at the R360 Disposal Facility in Hobbs, New Mexico. The excavation was backfilled on September 30, 2025, with locally purchased caliche material and recontoured to existing grade.

## LABORATORY ANALYTICAL RESULTS

Laboratory analytical results for confirmation soil samples FS01 and SW01 indicated all COCs were in compliance with Closure Criteria, successfully removing impacted soil identified in delineation soil sample BH01 and confirmation soil sample CS01. Laboratory analytical results are summarized in Table 1, and all laboratory analytical reports are included in Appendix D.

## LINER INTEGRITY INSPECTION ACTIVITIES

After a review of the C-141 and release photographs it was confirmed the release occurred within a lined containment. The lined containment was cleaned of all debris, power washed, and a 48-hour advance notice of the liner inspection was submitted on August 26, 2025. On August 28, 2025, the lined containment was inspected by Ensolum personnel and was determined to contain one tear on the floor of the liner, and a few areas of where the superficial liner material is peeling. Delineation of the release that occurred within the lined containment in the areas of where the liner is breached is warranted. Photographic documentation of the inspection is included in Appendix B.

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## PROPOSED REMEDIATION WORK PLAN

The excavation activities have successfully addressed the impacts related to the release extent located outside the lined containment but delineation within the lined containment is warranted. As such, XTO proposes completing the following remediation activities:

- Delineation boreholes will be advanced within the lined containment, in the vicinity of the tear located on the floor of the liner, and in any areas where the liner is fully breached from peeling. The delineation boreholes will be advanced until discrete soil samples confirm all COC concentrations are compliant with the Closure Criteria.
- Lateral delineation soil samples, SS01 and SS02, will be advanced to an equivalent depth of the deepest impacts identified within the lined containment area, to confirm lateral delineation of any potential impacts identified if the impacts exceed 1-foot bgs.
- All delineation soil samples will be field screened, collected, and submitted for analysis of the same COCs mentioned above and submitted to a New Mexico approved laboratory. Following delineation activities, all confirmed liner breaches will be patched.

XTO believes this *Work Plan* is protective of human health, the environment, and groundwater. As such, XTO requests approval of this *Work Plan* by NMOCD. XTO will complete the delineation and soil sampling activities within 90 days of the date of approval of this *Work Plan* by the NMOCD.

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

Sincerely,  
**Ensolum, LLC**



Tracy Hillard  
Project Engineer



Benjamin J. Belill  
Senior Geologist

cc: Robert Woodall, XTO  
Richard Kotzur, XTO  
BLM

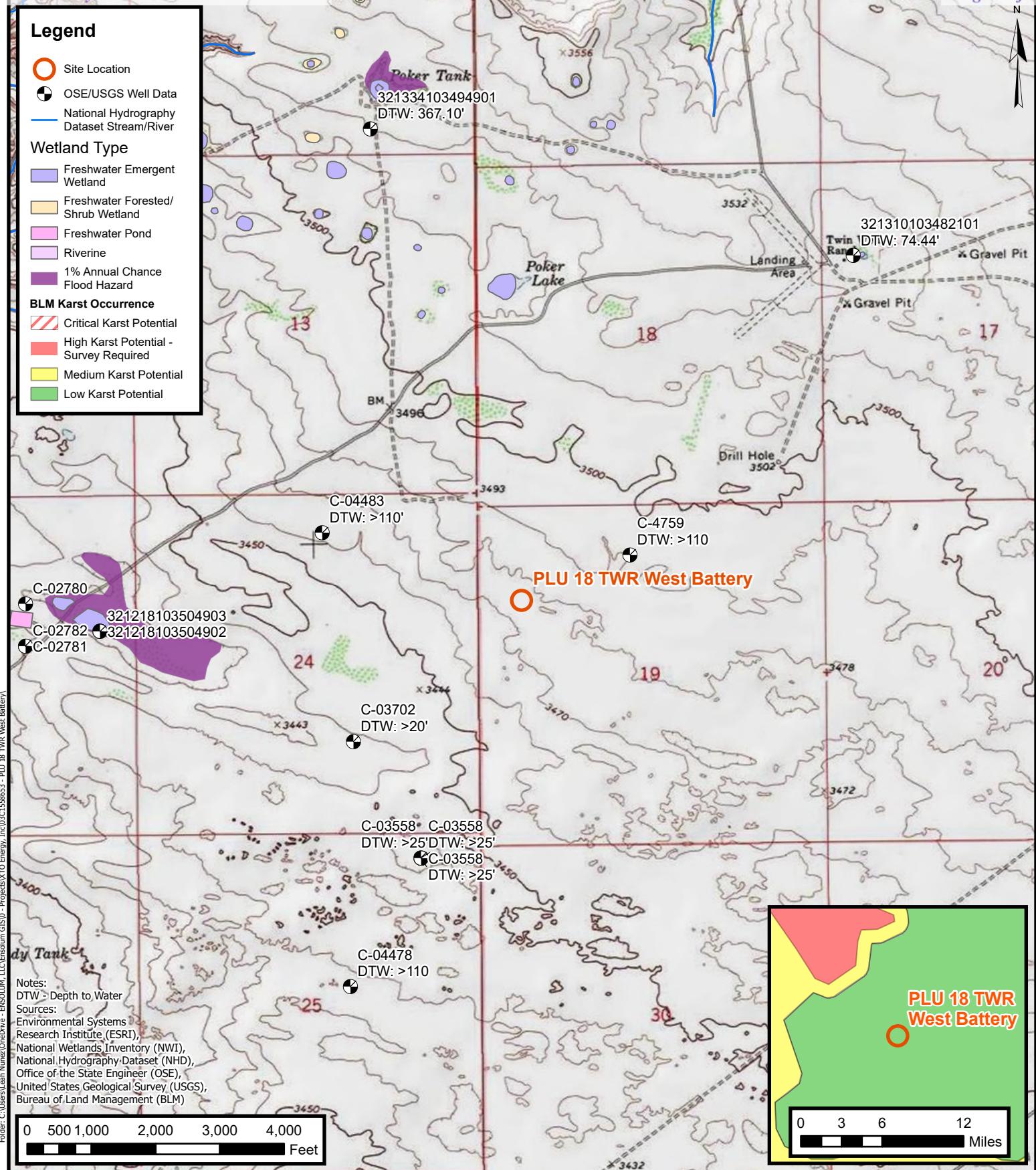
### Appendices:

Figure 1	Site Receptor Map
Figure 2	Delineation Soil Sample Locations
Figure 3	Confirmation Soil Sample Locations
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
Appendix E	Spill Volume Calculation



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## FIGURES





## Legend

- Delineation Soil Sample in Compliance with Closure Criteria
- Delineation Soil Sample with Concentrations Previously Exceeding Closure Criteria
- Oil and Gas Utility Line
- Liner
- Release Extent



## Delineation Soil Sample Locations

XTO Energy, Inc  
 PLU 18 TWR West Battery  
 Incident Number: nAPP2510144301  
 Unit D, Section 19, T 24S, R 31E  
 Eddy County, New Mexico

**FIGURE  
2**



## Legend

- Confirmation Floor  
Sample in Compliance with Closure Criteria
- ▲ Confirmation Sidewall  
Sample in Compliance with Closure Criteria
- Confirmation Floor  
Sample with Concentrations Exceeding Closure Criteria
- Oil and Gas Utility Line
- Liner
- Excavation Extent



Notes:  
Sample ID @ Depth Below Ground Surface.  
Samples in bold indicate sample exceeded applicable Closure Criteria.  
Grey text indicate soil sample was removed during excavation activities.

0 10 20  
Feet

Sources: Environmental Systems Research Institute (ESRI)



Environmental, Engineering and Hydrogeologic Consultants

## Confirmation Soil Sample Locations

XTO Energy, Inc  
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Unit D, Section 19, T 24S, R 31E  
Eddy County, New Mexico

**FIGURE  
3**



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## TABLES



TABLE 1  
**SOIL SAMPLE ANALYTICAL RESULTS**  
**PLU 18 TWR West Battery**  
**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	1,000	2,500	20,000
<b>Delineation Soil Samples</b>										
SS01	06/24/2025	Surface	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	<16.0
SS02	06/24/2025	Surface	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	<16.0
SS03	06/24/2025	Surface	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	16.0
SS04	06/24/2025	Surface	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	32.0
BH01	05/01/2025	0.5	<b>14.0</b>	<b>606</b>	9,690	25,100	4,250	<b>34,790</b>	<b>39,040</b>	112
BH01C	05/01/2025	3	<0.050	0.605	13.9	290	26.8	304	331	32.0
<b>Confirmation Soil Samples</b>										
CS01	05/01/2025	0.5	0.574	<b>212</b>	2,890	14,800	2,460	<b>17,690</b>	<b>20,150</b>	112
FS01	06/23/2025	2	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	16.0
SW01	06/23/2025	0-2	<0.050	<0.300	<10.0	29.9	<10.0	29.9	29.9	32.0

## 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.) Pod 1(BH01)			WELL TAG ID NO. n/a	OSE FILE NO(S). C-4759			
	WELL OWNER NAME(S) XTO Energy, Inc.			PHONE (OPTIONAL)				
	WELL OWNER MAILING ADDRESS 3401 Greene Street			CITY Carlsbad		STATE NM	ZIP 88220	
	WELL LOCATION (FROM GPS)	DEGREES LATITUDE	32	MINUTES 12	SECONDS 28.26	N	* ACCURACY REQUIRED: ONE TENTH OF A SECOND	
		LONGITUDE	-103	49	2.70	W	* DATUM REQUIRED: WGS 84	
	DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS – PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE Unit C, Section 19, Township 24 South, Range 31 East							
	LICENSE NO. WD-1188	NAME OF LICENSED DRILLER Scott Scarborough				NAME OF WELL DRILLING COMPANY Scarborough Drilling Inc.		
	DRILLING STARTED 8/7/2023	DRILLING ENDED 8/7/2023	DEPTH OF COMPLETED WELL (FT) Temp casing only	BORE HOLE DEPTH (FT) 110		DEPTH WATER FIRST ENCOUNTERED (FT) N/A		
	COMPLETED WELL IS: <input type="checkbox"/> ARTESIAN <input checked="" type="checkbox"/> DRY HOLE <input type="checkbox"/> SHALLOW (UNCONFINED)					STATIC WATER LEVEL IN COMPLETED WELL (FT) N/A		
	DRILLING FLUID: <input checked="" type="checkbox"/> AIR <input type="checkbox"/> MUD ADDITIVES – SPECIFY:							
DRILLING METHOD: <input checked="" type="checkbox"/> ROTARY <input type="checkbox"/> HAMMER <input type="checkbox"/> CABLE TOOL <input type="checkbox"/> OTHER – SPECIFY:								
DEPTH (feet bgl)	BORE HOLE DIAM (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)		CASING CONNECTION TYPE (add coupling diameter)	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)	SLOT SIZE (inches)	
FROM 0	TO 110	6		Temporary SCH 40 PVC	-	2	-	
2. DRILLING & CASING INFORMATION								
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	N/A					
OSE DRILL RUSSELL NM 2 APR '25 PM3:08								

FOR OSE INTERNAL USE

WR-20 WELL RECORD &amp; LOG (Version 04/30/19)

FILE NO. <b>C-4759</b>	POD NO. <b>1</b>	TRN NO. <b>749156</b>
LOCATION <b>24S.31E.19</b>	<b>421</b>	WELL TAG ID NO. <b>NA</b>
		PAGE 1 OF 2

FOR OSE INTERNAL USE

FILE NO. C-4759

LOCATION 745

LOCATION 245.

WR-20 WELL RECORD & LOG (Version 04/30/2019)

FOR USE INTERNAL USE  
FILE NO. C-4759 POD NO. 1 TRN NO. 749156  
LOCATION 245-31E-19 421 WELL TAG ID NO. N/14 PAGE 2 OF 2

TRN NO.	749156
WELL TAG ID NO.	N/17



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## APPENDIX B

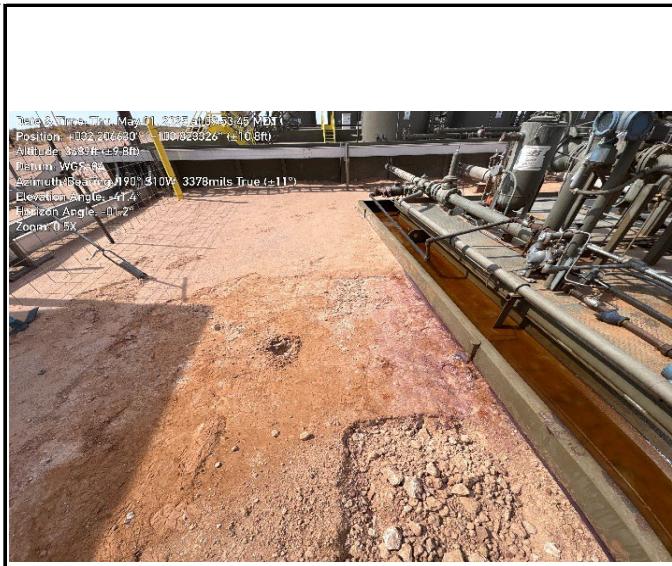
### Photographic Log

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### Photographic Log

XTO Energy, Inc  
PLU 18 TWR West Battery  
nAPP2510144301



Photograph: 1 Date: 4/10/2025  
Description: Initial release staining  
View: South

Photograph: 2 Date: 5/1/2025  
Description: Delineation activities; near BH01  
View: South



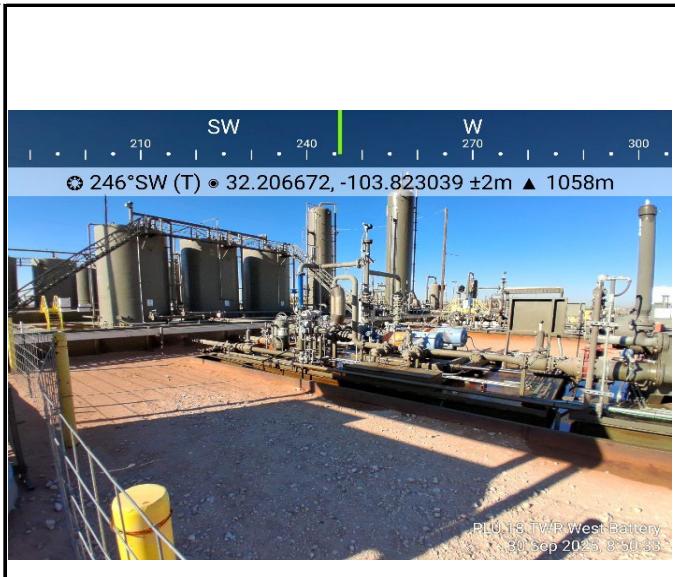
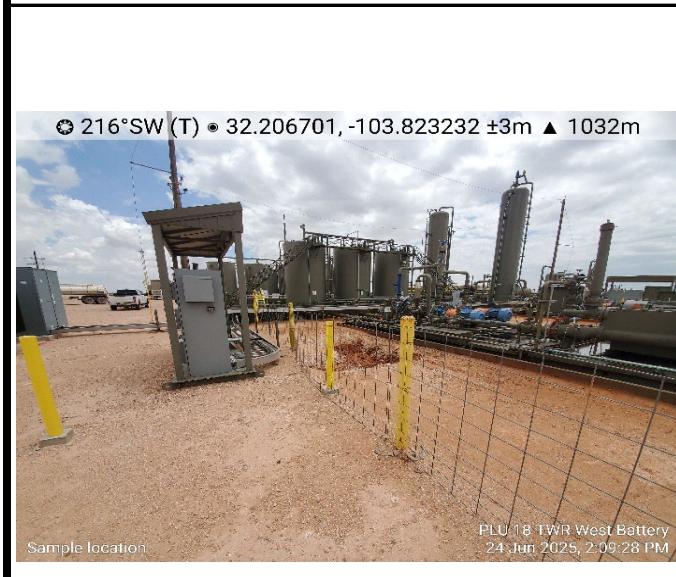
Photograph: 3 Date: 5/1/2025  
Description: Excavation activities  
View: North

Photograph: 4 Date: 6/23/2025  
Description: Excavation activities  
View: Northwest



### Photographic Log

XTO Energy, Inc  
PLU 18 TWR West Battery  
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Photograph: 5 Date: 6/24/2025  
Description: Final excavation extent  
View: Southwest

Photograph: 6 Date: 9/30/2025  
Description: Backfilled excavation extent  
View: Southwest

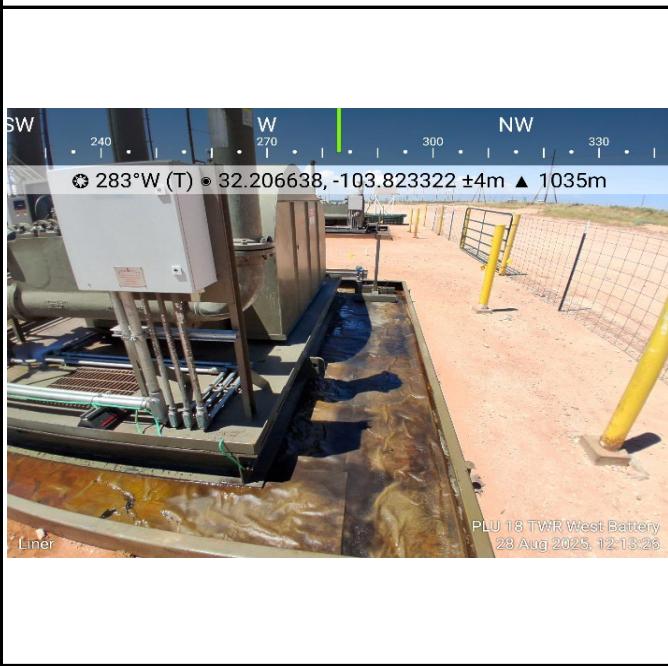


Photograph: 7 Date: 8/28/2025  
Description: Well sign  
View: West

Photograph: 8 Date: 8/28/2025  
Description: Liner inspection activities  
View: West

**Photographic Log**

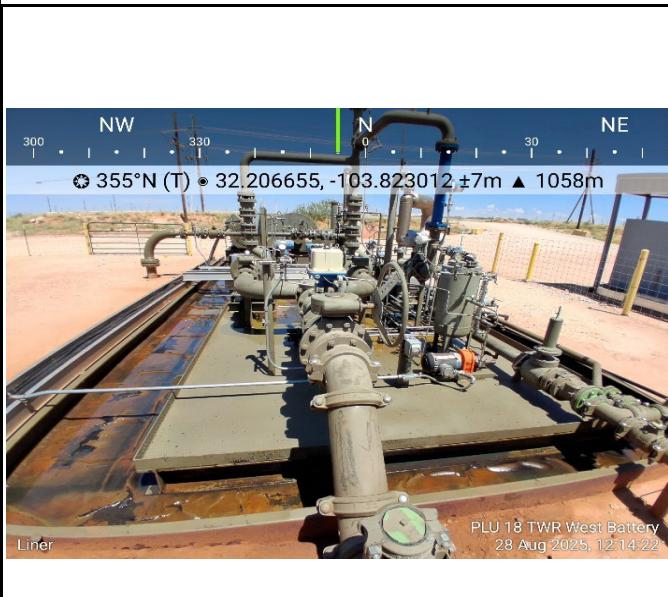
XTO Energy, Inc  
PLU 18 TWR West Battery  
nAPP2510144301



Photograph: 9 Date: 8/28/2025  
Description: Liner inspection activities  
View: West



Photograph: 10 Date: 8/28/2025  
Description: Liner inspection activities  
View: Southeast



Photograph: 11 Date: 8/28/2025  
Description: Liner inspection activities  
View: North

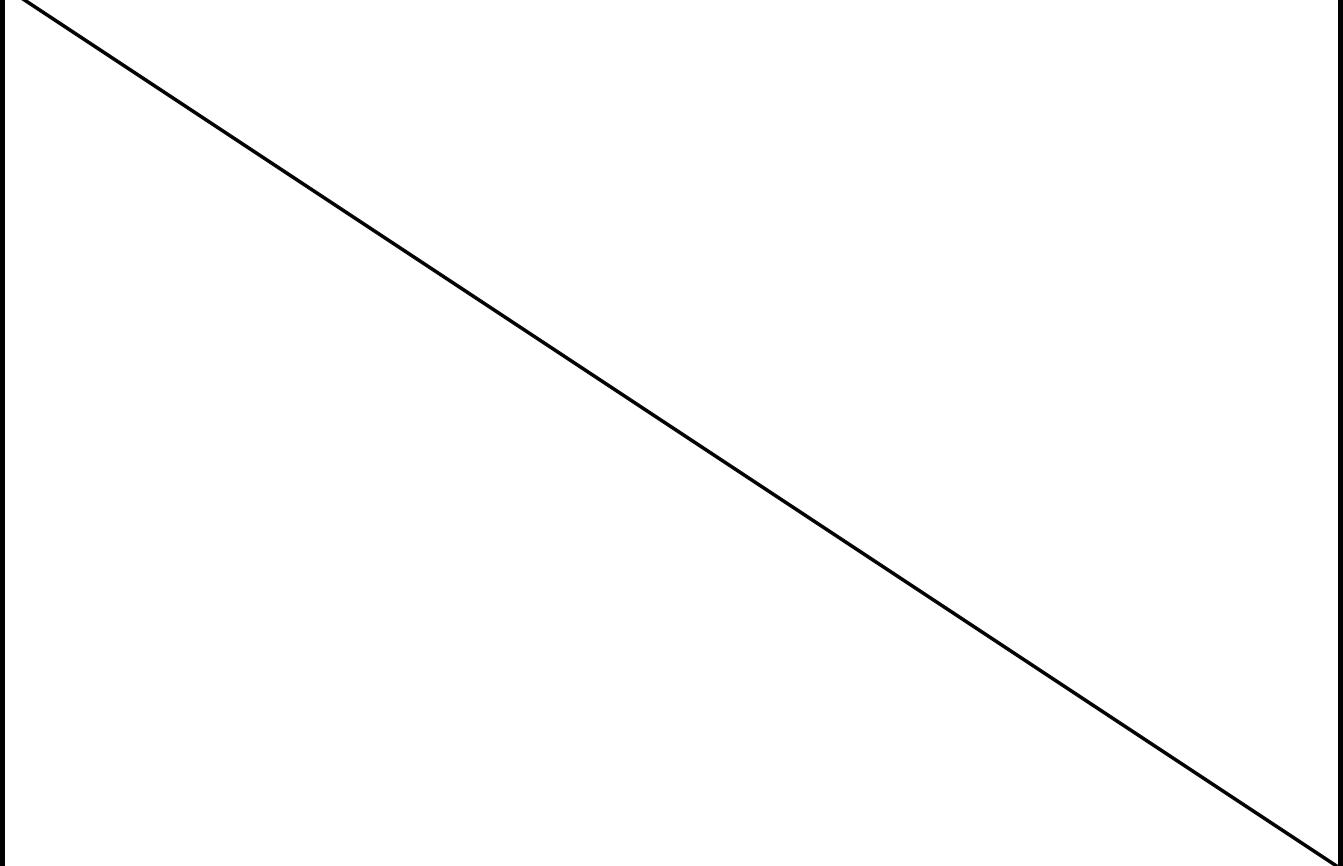


Photograph: 12 Date: 8/28/2025  
Description: Liner inspection activities  
View: North



## APPENDIX C

### Lithologic Soil Sampling Logs

 <b>ENSOLUM</b>								Sample Name: BH01	Date: 5/1/2025
								Site Name: PLU 18 TWR West Battery	
								Incident Number: nAPP2510144301	
								Job Number: 03C1558653	
<b>LITHOLOGIC / SOIL SAMPLING LOG</b>								Logged By: SB	Method: Hand Auger
Coordinates: 32.206629, -103.823307								Hole Diameter: 4"	Total Depth: 3 feet bgs
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% chloride correction factor is included.									
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions	
Dry	<168	4,679	Y	BH01	0.5	0	CCHE	(0-1') CALICHE, coarse grained, well graded with sand, strong odor	
Dry	<168	3,025	Y		1	1	SP	(1-3') SAND, red, poorly graded, with clay, some silt, with odor	
Dry	<168	243	N		2	2		(@2') no odor	
Dry	<168	244	N	BH01C	3	3	CCHE	(@3') CALICHE, tan, with sand, coarse grained	
Total Depth @ 3 feet bgs									
									



## APPENDIX D

### Laboratory Analytical Reports & Chain of Custody Documentation



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

May 08, 2025

TRACY HILLARD

ENSOLUM

3122 NATIONAL PARKS HWY

CARLSBAD, NM 88220

RE: PLU 18 TWR W BATTERY - SPILLS

Enclosed are the results of analyses for samples received by the laboratory on 05/02/25 10:42.

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".

Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

ENSLUM  
 TRACY HILLARD  
 3122 NATIONAL PARKS HWY  
 CARLSBAD NM, 88220  
 Fax To:

Received:	05/02/2025	Sampling Date:	05/01/2025
Reported:	05/08/2025	Sampling Type:	Soil
Project Name:	PLU 18 TWR W BATTERY - SPILLS	Sampling Condition:	Cool & Intact
Project Number:	03C1558653	Sample Received By:	Shalyn Rodriguez
Project Location:	XTO		

**Sample ID: BH 01 0.5' (H252629-01)**

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Benzene*</b>	<b>14.0</b>	5.00	05/05/2025	ND	1.60	80.1	2.00	12.6		
<b>Toluene*</b>	<b>189</b>	5.00	05/05/2025	ND	1.72	86.1	2.00	12.5		
<b>Ethylbenzene*</b>	<b>51.6</b>	5.00	05/05/2025	ND	1.73	86.7	2.00	13.3		
<b>Total Xylenes*</b>	<b>351</b>	15.0	05/05/2025	ND	5.54	92.4	6.00	12.2		
<b>Total BTEX</b>	<b>606</b>	30.0	05/05/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 122 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: KV						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Chloride</b>	<b>112</b>	16.0	05/02/2025	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	
<b>GRO C6-C10*</b>	<b>9690</b>	100	05/05/2025	ND	202	101	200	0.256		
<b>DRO &gt;C10-C28*</b>	<b>25100</b>	100	05/05/2025	ND	197	98.4	200	0.405		
<b>EXT DRO &gt;C28-C36</b>	<b>4250</b>	100	05/05/2025	ND					<b>S-06</b>	

Surrogate: 1-Chlorooctane 1010 % 44.4-145

Surrogate: 1-Chlorooctadecane 740 % 40.6-153

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

ENSLUM  
 TRACY HILLARD  
 3122 NATIONAL PARKS HWY  
 CARLSBAD NM, 88220  
 Fax To:

Received:	05/02/2025	Sampling Date:	05/01/2025
Reported:	05/08/2025	Sampling Type:	Soil
Project Name:	PLU 18 TWR W BATTERY - SPILLS	Sampling Condition:	Cool & Intact
Project Number:	03C1558653	Sample Received By:	Shalyn Rodriguez
Project Location:	XTO		

**Sample ID: BH 01C 3' (H252629-02)**

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	05/02/2025	ND	1.60	80.1	2.00	12.6		
<b>Toluene*</b>	<b>0.109</b>	0.050	05/02/2025	ND	1.72	86.1	2.00	12.5		
<b>Ethylbenzene*</b>	<b>0.057</b>	0.050	05/02/2025	ND	1.73	86.7	2.00	13.3		
<b>Total Xylenes*</b>	<b>0.439</b>	0.150	05/02/2025	ND	5.54	92.4	6.00	12.2		
<b>Total BTEX</b>	<b>0.605</b>	0.300	05/02/2025	ND						

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

Chloride, SM4500Cl-B		mg/kg		Analyzed By: KV						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Chloride</b>	<b>32.0</b>	16.0	05/02/2025	ND	432	108	400	0.00		
<b>TPH 8015M</b>										

Analyte		Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>GRO C6-C10*</b>	<b>13.9</b>	10.0	05/02/2025	ND	190	94.8	200	1.17		
<b>DRO &gt;C10-C28*</b>	<b>290</b>	10.0	05/02/2025	ND	182	90.8	200	1.58		
<b>EXT DRO &gt;C28-C36</b>	<b>26.8</b>	10.0	05/02/2025	ND						

Surrogate: 1-Chlorooctane 76.4 % 44.4-145

Surrogate: 1-Chlorooctadecane 81.7 % 40.6-153

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:**

ENSLUM  
 TRACY HILLARD  
 3122 NATIONAL PARKS HWY  
 CARLSBAD NM, 88220  
 Fax To:

Received:	05/02/2025	Sampling Date:	05/01/2025
Reported:	05/08/2025	Sampling Type:	Soil
Project Name:	PLU 18 TWR W BATTERY - SPILLS	Sampling Condition:	Cool & Intact
Project Number:	03C1558653	Sample Received By:	Shalyn Rodriguez
Project Location:	XTO		

**Sample ID: CS 01 0.5' (H252629-03)**

BTEX 8021B		mg/kg		Analyzed By: JH					S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Benzene*</b>	<b>0.574</b>	0.500	05/02/2025	ND	1.60	80.1	2.00	12.6		
<b>Toluene*</b>	<b>31.2</b>	0.500	05/02/2025	ND	1.72	86.1	2.00	12.5		
<b>Ethylbenzene*</b>	<b>22.1</b>	0.500	05/02/2025	ND	1.73	86.7	2.00	13.3		
<b>Total Xylenes*</b>	<b>158</b>	1.50	05/02/2025	ND	5.54	92.4	6.00	12.2		
<b>Total BTEX</b>	<b>212</b>	3.00	05/02/2025	ND						

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

Chloride, SM4500Cl-B		mg/kg		Analyzed By: KV					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>112</b>	16.0	05/02/2025	ND	432	108	400	0.00	
<b>TPH 8015M</b>								<b>S-06</b>	

Analyte		Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>GRO C6-C10*</b>		<b>2890</b>	100	05/05/2025	ND	190	94.8	200	1.17	
<b>DRO &gt;C10-C28*</b>		<b>14800</b>	100	05/05/2025	ND	182	90.8	200	1.58	
<b>EXT DRO &gt;C28-C36</b>		<b>2460</b>	100	05/05/2025	ND					

Surrogate: 1-Chlorooctane 458 % 44.4-145

Surrogate: 1-Chlorooctadecane 317 % 40.6-153

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



---

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### Notes and Definitions

S-06 The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.

S-04 The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.

BS-3 Blank spike recovery outside of lab established statistical limits, but still within method limits. Data is not adversely affected.

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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---

Celey D. Keene, Lab Director/Quality Manager



**CARDINAL**  
Laboratories

**CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

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Reinquished By: Date: Received By:

Relinquished By:	<b>John Brum</b>
Time:	0300-05
Date:	04/26
Received By:	<b>R. J. D.</b>
REMARKS:	None

Delivered By: (Circle One)	Observed Temp. °C	Sample Condition	CHECKED BY: (Initials)
Carrier Lips - Bus - Other:	Corrected Temp. °C	Cool Inact Yes	
			Turnaround Time:
			Thermometer ID: #

FORM-006 R 3.2 10/07/21

† Cardinal cannot accept verbal changes. Please email changes to [celley.keeme@cardinallabsnm.com](mailto:celley.keeme@cardinallabsnm.com)



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

June 27, 2025

TRACY HILLARD

ENSOLUM, LLC

705 W WADLEY AVE.

MIDLAND, TX 79705

RE: PLU 18 TWR WEST BATTERY - SPILLS

Enclosed are the results of analyses for samples received by the laboratory on 06/26/25 13:40.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C25-00101. 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".

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:	06/26/2025	Sampling Date:	06/23/2025
Reported:	06/27/2025	Sampling Type:	Soil
Project Name:	PLU 18 TWR WEST BATTERY - SPILLS	Sampling Condition:	Cool & Intact
Project Number:	03C1558653	Sample Received By:	Tamara Oldaker
Project Location:	XTO 32.206629, -103.823315		

**Sample ID: FS 01 2' (H253857-01)**

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	06/26/2025	ND	2.02	101	2.00	2.18	
Toluene*		<0.050	0.050	06/26/2025	ND	2.06	103	2.00	2.11	
Ethylbenzene*		<0.050	0.050	06/26/2025	ND	2.01	100	2.00	2.61	
Total Xylenes*		<0.150	0.150	06/26/2025	ND	5.91	98.5	6.00	2.71	
Total BTEX		<0.300	0.300	06/26/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 96.1 % 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		16.0	16.0	06/27/2025	ND	448	112	400	3.64	

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	06/26/2025	ND	193	96.6	200	0.882	
DRO >C10-C28*		<10.0	10.0	06/26/2025	ND	211	105	200	0.593	
EXT DRO >C28-C36		<10.0	10.0	06/26/2025	ND					

Surrogate: 1-Chlorooctane 79.0 % 44.4-145

Surrogate: 1-Chlorooctadecane 73.4 % 40.6-153

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:	06/26/2025	Sampling Date:	06/23/2025
Reported:	06/27/2025	Sampling Type:	Soil
Project Name:	PLU 18 TWR WEST BATTERY - SPILLS	Sampling Condition:	Cool & Intact
Project Number:	03C1558653	Sample Received By:	Tamara Oldaker
Project Location:	XTO 32.206629, -103.823315		

**Sample ID: SW 01 0-2' (H253857-02)**

<b>BTEX 8021B</b>		<b>mg/kg</b>		<b>Analyzed By: JH</b>						
Analyte		Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*		<0.050	0.050	06/26/2025	ND	2.02	101	2.00	2.18	
Toluene*		<0.050	0.050	06/26/2025	ND	2.06	103	2.00	2.11	
Ethylbenzene*		<0.050	0.050	06/26/2025	ND	2.01	100	2.00	2.61	
Total Xylenes*		<0.150	0.150	06/26/2025	ND	5.91	98.5	6.00	2.71	
Total BTEX		<0.300	0.300	06/26/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 95.0 % 71.5-134

<b>Chloride, SM4500Cl-B</b>		<b>mg/kg</b>		<b>Analyzed By: HM</b>						
Analyte		Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>		<b>32.0</b>	16.0	06/27/2025	ND	448	112	400	3.64	

<b>TPH 8015M</b>		<b>mg/kg</b>		<b>Analyzed By: MS</b>						
Analyte		Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*		<10.0	10.0	06/26/2025	ND	193	96.6	200	0.882	
<b>DRO &gt;C10-C28*</b>		<b>29.9</b>	10.0	06/26/2025	ND	211	105	200	0.593	
EXT DRO >C28-C36		<10.0	10.0	06/26/2025	ND					

Surrogate: 1-Chlorooctane 86.4 % 44.4-145

Surrogate: 1-Chlorooctadecane 80.7 % 40.6-153

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

---

### 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 that reads "Celey D. Keene".

---

Celey D. Keene, Lab Director/Quality Manager





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

June 27, 2025

TRACY HILLARD

ENSOLUM, LLC

705 W WADLEY AVE.

MIDLAND, TX 79705

RE: PLU 18 TWR WEST BATTERY - SPILLS

Enclosed are the results of analyses for samples received by the laboratory on 06/26/25 13:40.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C25-00101. 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".

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:	06/26/2025	Sampling Date:	06/24/2025
Reported:	06/27/2025	Sampling Type:	Soil
Project Name:	PLU 18 TWR WEST BATTERY - SPILLS	Sampling Condition:	Cool & Intact
Project Number:	03C1558653	Sample Received By:	Tamara Oldaker
Project Location:	XTO 32.206629, -103.823315		

**Sample ID: SS 01 0' (H253859-01)**

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	06/26/2025	ND	2.17	108	2.00	0.203		
Toluene*	<0.050	0.050	06/26/2025	ND	2.12	106	2.00	0.874		
Ethylbenzene*	<0.050	0.050	06/26/2025	ND	2.11	105	2.00	0.293		
Total Xylenes*	<0.150	0.150	06/26/2025	ND	6.17	103	6.00	0.296		
Total BTEX	<0.300	0.300	06/26/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 110 % 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	<16.0	16.0	06/27/2025	ND	432	108	400	3.64		

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	06/26/2025	ND	221	111	200	3.44		
DRO >C10-C28*	<10.0	10.0	06/26/2025	ND	216	108	200	1.97		
EXT DRO >C28-C36	<10.0	10.0	06/26/2025	ND						

Surrogate: 1-Chlorooctane 82.9 % 44.4-145

Surrogate: 1-Chlorooctadecane 78.3 % 40.6-153

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:	06/26/2025	Sampling Date:	06/24/2025
Reported:	06/27/2025	Sampling Type:	Soil
Project Name:	PLU 18 TWR WEST BATTERY - SPILLS	Sampling Condition:	Cool & Intact
Project Number:	03C1558653	Sample Received By:	Tamara Oldaker
Project Location:	XTO 32.206629, -103.823315		

**Sample ID: SS 02 0' (H253859-02)**

<b>BTEX 8021B</b>		<b>mg/kg</b>		<b>Analyzed By: JH</b>						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	06/26/2025	ND	2.17	108	2.00	0.203		
Toluene*	<0.050	0.050	06/26/2025	ND	2.12	106	2.00	0.874		
Ethylbenzene*	<0.050	0.050	06/26/2025	ND	2.11	105	2.00	0.293		
Total Xylenes*	<0.150	0.150	06/26/2025	ND	6.17	103	6.00	0.296		
Total BTEX	<0.300	0.300	06/26/2025	ND						

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

<b>Chloride, SM4500Cl-B</b>		<b>mg/kg</b>		<b>Analyzed By: AC</b>						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	06/27/2025	ND	432	108	400	3.64		

<b>TPH 8015M</b>		<b>mg/kg</b>		<b>Analyzed By: MS</b>						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10*	<10.0	10.0	06/26/2025	ND	221	111	200	3.44		
DRO >C10-C28*	<10.0	10.0	06/26/2025	ND	216	108	200	1.97		
EXT DRO >C28-C36	<10.0	10.0	06/26/2025	ND						

Surrogate: 1-Chlorooctane 82.5 % 44.4-145

Surrogate: 1-Chlorooctadecane 77.8 % 40.6-153

Cardinal Laboratories

\*=Accredited Analyte

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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:	06/26/2025	Sampling Date:	06/24/2025
Reported:	06/27/2025	Sampling Type:	Soil
Project Name:	PLU 18 TWR WEST BATTERY - SPILLS	Sampling Condition:	Cool & Intact
Project Number:	03C1558653	Sample Received By:	Tamara Oldaker
Project Location:	XTO 32.206629, -103.823315		

**Sample ID: SS 03 0' (H253859-03)**

<b>BTEX 8021B</b>		<b>mg/kg</b>		<b>Analyzed By: JH</b>						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	06/26/2025	ND	2.17	108	2.00	0.203		
Toluene*	<0.050	0.050	06/26/2025	ND	2.12	106	2.00	0.874		
Ethylbenzene*	<0.050	0.050	06/26/2025	ND	2.11	105	2.00	0.293		
Total Xylenes*	<0.150	0.150	06/26/2025	ND	6.17	103	6.00	0.296		
Total BTEX	<0.300	0.300	06/26/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 113 % 71.5-134

<b>Chloride, SM4500Cl-B</b>		<b>mg/kg</b>		<b>Analyzed By: AC</b>						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Chloride</b>	<b>16.0</b>	16.0	06/27/2025	ND	432	108	400	3.64		

<b>TPH 8015M</b>		<b>mg/kg</b>		<b>Analyzed By: MS</b>						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10*	<10.0	10.0	06/26/2025	ND	221	111	200	3.44		
DRO >C10-C28*	<10.0	10.0	06/26/2025	ND	216	108	200	1.97		
EXT DRO >C28-C36	<10.0	10.0	06/26/2025	ND						

Surrogate: 1-Chlorooctane 72.6 % 44.4-145

Surrogate: 1-Chlorooctadecane 68.2 % 40.6-153

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\*=Accredited Analyte

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**Analytical Results For:**

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

Received:	06/26/2025	Sampling Date:	06/24/2025
Reported:	06/27/2025	Sampling Type:	Soil
Project Name:	PLU 18 TWR WEST BATTERY - SPILLS	Sampling Condition:	Cool & Intact
Project Number:	03C1558653	Sample Received By:	Tamara Oldaker
Project Location:	XTO 32.206629, -103.823315		

**Sample ID: SS 04 0' (H253859-04)**

<b>BTEX 8021B</b>		<b>mg/kg</b>		<b>Analyzed By: JH</b>						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	06/26/2025	ND	2.17	108	2.00	0.203		
Toluene*	<0.050	0.050	06/26/2025	ND	2.12	106	2.00	0.874		
Ethylbenzene*	<0.050	0.050	06/26/2025	ND	2.11	105	2.00	0.293		
Total Xylenes*	<0.150	0.150	06/26/2025	ND	6.17	103	6.00	0.296		
Total BTEX	<0.300	0.300	06/26/2025	ND						

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

<b>Chloride, SM4500Cl-B</b>		<b>mg/kg</b>		<b>Analyzed By: AC</b>						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Chloride</b>	<b>32.0</b>	16.0	06/27/2025	ND	432	108	400	3.64		

<b>TPH 8015M</b>		<b>mg/kg</b>		<b>Analyzed By: MS</b>						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10*	<10.0	10.0	06/26/2025	ND	221	111	200	3.44		
DRO >C10-C28*	<10.0	10.0	06/26/2025	ND	216	108	200	1.97		
EXT DRO >C28-C36	<10.0	10.0	06/26/2025	ND						

Surrogate: 1-Chlorooctane 74.7 % 44.4-145

Surrogate: 1-Chlorooctadecane 69.7 % 40.6-153

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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 that reads "Celey D. Keene".

---

Celey D. Keene, Lab Director/Quality Manager



**CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

101 East Maryland, Hobbs, NM 88240

(575) 393-2326 FAX (575) 393-2476

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RELINQUISHED BY: JOHN H. BROWN

Relinquished By:

111

Delivered By: (Circle One)

Sampler - UPS - Bus - Other

FORM-000 R 3.2 10/01/2011

† Cardinal cannot accept verbal changes. Please email changes to [teley.Keene@cardinalbaltimore.org](mailto:teley.Keene@cardinalbaltimore.org).



## Appendix E

### Spill Volume Calculation

<b>Location:</b>	<b>PLU 18 TWR West Battery</b>	
<b>Spill Date:</b>	<b>4/9/2025</b>	
<b>Incident #:</b>		
<b>Area 1</b>		
Approximate Area =	115	sq. ft.
Average Saturation (or depth) of spill =	0.10	inches
Average Porosity Factor =	0.15	
<b>VOLUME OF LEAK</b>		
Total Crude Oil =	11.00	bbls
Total Produced Water =		bbls
<b>Area 2</b>		
Approximate Area =		sq. ft.
Average Saturation (or depth) of spill =		inches
<b>VOLUME OF LEAK</b>		
Total Crude Oil =		bbls
Total Produced Water =		bbls
<b>TOTAL VOLUME OF LEAK</b>		
Total Crude Oil =	11.00	bbls
Total Produced Water =		bbls
<b>TOTAL VOLUME RECOVERED</b>		
Total Crude Oil =	10.00	bbls
Total Produced Water =		bbls

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

QUESTIONS

Action 537894

**QUESTIONS**

Operator:  XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:  5380
	Action Number:  537894
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

**QUESTIONS**

<b>Prerequisites</b>	
Incident ID (n#)	nAPP2510144301
Incident Name	NAPP2510144301 PLU 18 TWR WEST BATTERY @ A-19-24S-31E
Incident Type	Oil Release
Incident Status	Remediation Plan Received

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

Site Name	PLU 18 TWR WEST BATTERY
Date Release Discovered	04/09/2025
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: Human Error   Pump   Crude Oil   Released: 11 BBL   Recovered: 10 BBL   Lost: 1 BBL.
Produced Water Released (bbls) Details	<i>Not answered.</i>
Is the concentration of chloride in the produced water >10,000 mg/l	No
Condensate Released (bbls) Details	<i>Not answered.</i>
Natural Gas Vented (Mcf) Details	<i>Not answered.</i>
Natural Gas Flared (Mcf) Details	<i>Not answered.</i>
Other Released Details	<i>Not answered.</i>
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	<i>Not answered.</i>

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QUESTIONS, Page 2

Action 537894

**QUESTIONS (continued)**

Operator:  XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:  5380
	Action Number:  537894
	Action Type:  [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

**QUESTIONS**

<b>Nature and Volume of Release (continued)</b>	
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.*

<b>Initial Response</b>	
<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: 12/26/2025
--	---

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QUESTIONS, Page 3

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Action 537894

**QUESTIONS (continued)**

Operator:  XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:  5380
	Action Number:  537894
	Action Type:  [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

**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
<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 1 and 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between $\frac{1}{2}$ and 1 (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 $\frac{1}{2}$ and 1 (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 $\frac{1}{2}$ and 1 (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	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)	32
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	331
GRO+DRO (EPA SW-846 Method 8015M)	304
BTEX (EPA SW-846 Method 8021B or 8260B)	0.6
Benzene (EPA SW-846 Method 8021B or 8260B)	0

*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.*

On what estimated date will the remediation commence	04/10/2025
On what date will (or did) the final sampling or liner inspection occur	03/10/2026
On what date will (or was) the remediation complete(d)	03/10/2026
What is the estimated surface area (in square feet) that will be reclaimed	150
What is the estimated volume (in cubic yards) that will be reclaimed	22
What is the estimated surface area (in square feet) that will be remediated	150
What is the estimated volume (in cubic yards) that will be remediated	11

*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.*

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QUESTIONS, Page 4

Action 537894

**QUESTIONS (continued)**

Operator:  XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:  5380
	Action Number:  537894
	Action Type:  [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

**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.)*

(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
OR which OCD approved well (API) will be used for <b>off-site</b> disposal	Not answered.
OR is the <b>off-site</b> disposal site, to be used, out-of-state	Not answered.
OR 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.

*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: 12/26/2025
--	---

*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.*

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QUESTIONS, Page 5

Action 537894

**QUESTIONS (continued)**

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380  Action Number: 537894  Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)
---	--

**QUESTIONS**

**Deferral Requests Only**

*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.*

Requesting a deferral of the remediation closure due date with the approval of this submission	No
--	----

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QUESTIONS, Page 6

Action 537894

**QUESTIONS (continued)**

Operator:  XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:  5380
	Action Number:  537894
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

**QUESTIONS**

<b>Sampling Event Information</b>	
Last sampling notification (C-141N) recorded	<b>529836</b>
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	<b>12/03/2025</b>
What was the (estimated) number of samples that were to be gathered	<b>5</b>
What was the sampling surface area in square feet	<b>1000</b>

<b>Remediation Closure Request</b>	
<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	<b>No</b>

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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**

CONDITIONS

Action 537894

**CONDITIONS**

Operator:  XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:  5380
	Action Number:  537894
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

**CONDITIONS**

Created By	Condition	Condition Date
rhamlet	The Remediation Plan is Conditionally Approved. An additional sidewall sample will need to be taken where the release area meets the secondary containment wall to ensure contaminants from the overspray area didn't go underneath the containment.	1/9/2026