

Kristen Houston
Regulatory Analyst
XTO Permian Operating, LLC
6401 Holiday Hill Road, Bldg 5



May 20, 2025

Victoria Venegas
ENMRD-Oil Conservation Division
Environmental Bureau -
506 W. Texas Ave.
Artesia, NM 88210

Re: Administrative Order 2RF-125
JRU Legg Recycling Facility
Facility ID (FAB1805930906)

Victoria,

XTO Permian Operating, LLC. Respectfully requests a one-year extension to the existing C-147 permit for the JRU Legg Recycling Facility. The annual extension requests of the Permit 2RF-125 JRU Legg recycling Facility ID (fab1805930906) from February 26, 2025, to February 25, 2026.

If you have any questions or need any additional information, please feel free to contact me at (432)894-1588.

Sincerely,

A handwritten signature in black ink that reads 'Kristen Houston'.

Kristen Houston
Regulatory Analyst

State of New Mexico
Energy Minerals and Natural Resources
Department Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505
<https://www.emnrd.nm.gov/ocd/ocd-e-permitting/>

Form C-147
Revised October 11, 2022

Recycling Facility and/or Recycling Containment

Type of Facility: ☒ Recycling Facility ☒ Recycling Containment*
Type of action: ☒ Permit ☐ Registration
☐ Modification ☒ Extension
☐ Closure ☐ Other (explain) _____

*** At the time C-147 is submitted to the division for a Recycling Containment, a copy shall be provided to the surface owner.**

Be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.
 Operator: XTO Permian Operating LLC (For multiple operators attach page with information) OGRID #: 373075
 Address: 6401 Holiday Hill Rd Bldg 5 Midland Tx 79707
 Facility or well name (include API# if associated with a well): JRU Legg Recycling Facility
 OCD Permit Number: 2RF-125/fAB1805930906 (For new facilities the permit number will be assigned by the district office)
 U/L or Qtr/Qtr F/G/J Section 27 Township 22S Range 30E County: Eddy
 Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

2.
☒ **Recycling Facility:**
 Location of recycling facility (if applicable): Latitude 32.36587 Longitude -103.88046 NAD83
 Proposed Use: ☒ Drilling* ☒ Completion* ☒ Production* ☒ Plugging*
**The re-use of produced water may NOT be used until fresh water zones are cased and cemented*
☐ Other, *requires permit for other uses. Describe use, process, testing, volume of produced water and ensure there will be no adverse impact on groundwater or surface water.*
☒ Fluid Storage
☐ Above ground tanks ☒ Recycling containment ☐ Activity permitted under 19.15.17 NMAC explain type _____
☐ Activity permitted under 19.15.36 NMAC explain type: _____ ☐ Other explain _____
☐ For multiple or additional recycling containments, attach design and location information of each containment
☐ **Closure Report (required within 60 days of closure completion):** ☐ Recycling Facility Closure Completion Date: _____

3.
☒ **Recycling Containment:**
☒ Annual Extension after initial 5 years (attach summary of monthly leak detection inspections for previous year)
 Center of Recycling Containment (if applicable): Latitude 32.36498 Longitude -103.86900 NAD83
☐ For multiple or additional recycling containments, attach design and location information of each containment
☒ Lined ☐ Liner type: Thickness _____ mil ☒ LLDPE ☒ HDPE ☐ PVC ☐ Other _____
☐ String-Reinforced
 Liner Seams: ☒ Welded ☐ Factory ☐ Other _____ Volume: 500,000 x 2 bbl Dimensions: L 1450' x W 800' x D 12'
☐ Recycling Containment Closure Completion Date: _____

4.

Bonding:

- ☒ Covered under bonding pursuant to 19.15.8 NMAC per 19.15.34.15(A)(2) NMAC (These containments are limited to only the wells owned or operated by the owners of the containment.)
- ☐ Bonding in accordance with 19.15.34.15(A)(1). Amount of bond \$ _____ (work on these facilities cannot commence until bonding amounts are approved)
- ☐ Attach closure cost estimate and documentation on how the closure cost was calculated.

5.

Fencing:

- ☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet
- ☒ Alternate. Please specify 8' game fence w/ 3 strands barbed wire

6.

Signs:

- ☒ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers
- ☐ Signed in compliance with 19.15.16.8 NMAC

7.

Variances:

Justifications and/or demonstrations that the proposed variance will afford reasonable protection against contamination of fresh water, human health, and the environment.

Check the below box only if a variance is requested:

☒ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval. If a Variance is requested, include the variance information on a separate page and attach it to the C-147 as part of the application.

If a Variance is requested, it must be approved prior to implementation.

8.

Siting Criteria for Recycling Containment

Instructions: The applicant must provide attachments that demonstrate compliance for each siting criteria below as part of the application. Potential examples of the siting attachment source material are provided below under each criteria.

General siting**Ground water is less than 50 feet below the bottom of the Recycling Containment.**

NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☒ No
☐ NA

Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended.

☐ Yes ☒ No
☐ NA

- Written confirmation or verification from the municipality; written approval obtained from the municipality

Within the area overlying a subsurface mine.

☐ Yes ☒ No

- Written confirmation or verification or map from the NM EMNRD-Mining and Minerals Division

Within an unstable area.

☐ Yes ☒ No

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; topographic map

Within a 100-year floodplain. FEMA map

☐ Yes ☒ No

Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

☐ Yes ☒ No

- Topographic map; visual inspection (certification) of the proposed site

Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

☐ Yes ☒ No

- Visual inspection (certification) of the proposed site; aerial photo; satellite image

Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.

☐ Yes ☒ No

- NM Office of the State Engineer - iWATERS database search; visual inspection (certification) of the proposed site

Within 500 feet of a wetland.

☐ Yes ☒ No

- US Fish and Wildlife Wetland Identification map; topographic map; visual inspection (certification) of the proposed site

9.

Recycling Facility and/or Containment Checklist:

Instructions: Each of the following items must be attached to the application. Indicate, by a check mark in the box, that the documents are attached.

- ☐ Design Plan - based upon the appropriate requirements.
☐ Operating and Maintenance Plan - based upon the appropriate requirements.
☐ Closure Plan - based upon the appropriate requirements.
☐ Site Specific Groundwater Data -
☐ Siting Criteria Compliance Demonstrations –
☒ Certify that notice of the C-147 (only) has been sent to the surface owner(s)

10.

Operator Application Certification:

I hereby certify that the information and attachments submitted with this application are true, accurate and complete to the best of my knowledge and belief.

Name (Print): Kristen Houston Title: Regulatory Advisor
Signature: Kristen Houston Date: 5/20/25
e-mail address: _____ Telephone: _____

11.

OCD Representative Signature: Victoria Venegas Approval Date: 06/12/2025

Title: Environmental Specialist OCD Permit Number: 2RF-125

- ☒ OCD Conditions _____
☒ Additional OCD Conditions on Attachment _____

JRU LEGG FRAC PIT

LEAK DETECTION DATA

Procedure for Performing Monthly Leak Detection Test for NCFR(Non-commercial fluid recycling) Pits

- 1) Drain sump to establish a zero baseline and note time
- 2) After 24 hours, drain sump and note volume of water recovered

South PIT: Brackish Water						
Month	Action	Date	Pump Time	Volume Recovered from Sump (gal)	Meter Start/Stop	NOTES:
Jan-24	INITIAL Pond Drain	01/05/24			-	
	24 HR Leak Detection		24hr	268	268.00	
	INITIAL Pond Drain	01/11/24			-	
	24 HR Leak Detection		24hr	432	432.00	
	INITIAL Pond Drain	01/19/24			-	
	24 HR Leak Detection		24hr	356	356.00	
Feb-24	INITIAL Pond Drain	01/30/24			-	
	24 HR Leak Detection		24hr	892	892.00	
	INITIAL Pond Drain	02/09/24			-	
	24 HR Leak Detection		24hr	120	120.00	
	INITIAL Pond Drain	02/15/24			-	
	24 HR Leak Detection		24hr	236	236.00	
Mar-24	INITIAL Pond Drain	02/19/24			-	
	24 HR Leak Detection		24hr	658	658.00	
	INITIAL Pond Drain	02/28/24			-	
	24 HR Leak Detection		24hr	119	119.00	
	INITIAL Pond Drain	03/05/24			-	
	24 HR Leak Detection		24hr	135	135.00	
Apr-24	INITIAL Pond Drain	03/12/24			-	
	24 HR Leak Detection		24hr	333	333.00	
	INITIAL Pond Drain	03/17/24			-	
	24 HR Leak Detection		24hr	720	720.00	
	INITIAL Pond Drain	03/24/24			-	
	24 HR Leak Detection		24 Hr	670	670.00	
	INITIAL Pond Drain		24HR		-	
	24 HR Leak Detection			75	75.00	
	INITIAL Pond Drain	04/06/24			-	
	24 HR Leak Detection		24hr	80	80.00	
	INITIAL Pond Drain	04/14/24			-	
	24 HR Leak Detection		24hr	674	674.00	
	INITIAL Pond Drain	04/19/24			-	
	24 HR Leak Detection		24 hr	453	453.00	

May-24	INITIAL Pond Drain	05/04/24			330	-	-
	24 HR Leak Detection		24hr			330.00	
	INITIAL Pond Drain	05/11/24			319	-	-
	24 HR Leak Detection		24hr			319.40	
	INITIAL Pond Drain	05/17/24			749	-	-
	24 HR Leak Detection		24hr			749.00	
Jun-24	INITIAL Pond Drain	05/26/24			1,334	-	-
	24 HR Leak Detection		24hr			1,334.00	
	INITIAL Pond Drain	06/03/24			788	-	-
	24 HR Leak Detection		24hr			788.00	
	INITIAL Pond Drain	06/11/24			115	-	-
	24 HR Leak Detection		24hr			115.00	
Jul-24	INITIAL Pond Drain	06/16/24			1,900	-	-
	24 HR Leak Detection		24hr			1,900.00	
	INITIAL Pond Drain	06/30/24			300	-	-
	24 HR Leak Detection		24hr			300.00	
	INITIAL Pond Drain	07/07/24			5,035	-	-
	24 HR Leak Detection		24hr			5,035.00	
Aug-24	INITIAL Pond Drain	07/14/24			320	-	-
	24 HR Leak Detection		24hr			320.00	
	INITIAL Pond Drain	07/22/24			1,423	-	-
	24 HR Leak Detection		24hr			1,423.00	
	INITIAL Pond Drain	07/28/24			16	-	-
	24 HR Leak Detection		24hr			16.00	
Aug-24	INITIAL Pond Drain	08/05/24			34	-	-
	24 HR Leak Detection		24hr			34.00	
	INITIAL Pond Drain	08/11/24			160	-	-
	24 HR Leak Detection		24hr			160.00	
	INITIAL Pond Drain	08/21/24			54	-	-
	24 HR Leak Detection		24hr			54.00	
Sep-24	INITIAL Pond Drain	08/25/24			120	-	-
	24 HR Leak Detection		24hr			120.00	
	INITIAL Pond Drain	09/02/24			439	-	-
	24 HR Leak Detection		24hr			439.00	
	INITIAL Pond Drain	09/10/24			120	-	-
	24 HR Leak Detection		24hr			120.00	
Sep-24	INITIAL Pond Drain	09/14/24			49	-	-
	24 HR Leak Detection		24hr			49.00	
	INITIAL Pond Drain	09/27/24			86	-	-
	24 HR Leak Detection		24hr			86.00	
	INITIAL Pond Drain	10/04/24			240	-	-
	24 HR Leak Detection		24hr			240.00	
Oct-24	INITIAL Pond Drain	10/11/24			115	-	-
	24 HR Leak Detection		24hr			115.00	
	INITIAL Pond Drain	10/17/24			500	-	-
	24 HR Leak Detection		24hr			500.00	
	INITIAL Pond Drain	10/24/24			٣٣٤	-	-
	24 HR Leak Detection		24hr				

	24 HR Leak Detection		24hr	226.00	226.00	
Nov-24	INITIAL Pond Drain	11/02/24				
	24 HR Leak Detection		24hr	126	126.00	-
	INITIAL Pond Drain	11/09/24				
	24 HR Leak Detection		24hr	266	266.00	-
	INITIAL Pond Drain	11/17/24				
	24 HR Leak Detection		24hr	150	150.00	-
	INITIAL Pond Drain	11/29/24				
	24 HR Leak Detection		24hr	654	654.00	-
Dec-24	INITIAL Pond Drain	12/07/24				
	24 HR Leak Detection		24hr	97	97.00	-
	INITIAL Pond Drain	12/14/24				
	24 HR Leak Detection		24hr	119	119.00	-
	INITIAL Pond Drain	12/22/24				
	24 HR Leak Detection		24hr	111	111.00	-
	INITIAL Pond Drain	12/28/24				
	24 HR Leak Detection		24hr	120	120.00	-

North PIT: Recycled Produced Water

Month	Action	Date	Pump Time	Volume Recovered from Sump (gal)	Meter Start/Stop	NOTES:
Jan-24	INITIAL Pond Drain	01/05/24		0	-	no water
	24 HR Leak Detection		24hr		-	
	INITIAL Pond Drain	01/11/24		0	-	pump don't turn on
	24 HR Leak Detection		24hr		-	
	INITIAL Pond Drain	01/19/24		0	-	
Feb-24	24 HR Leak Detection		24hr		-	
	INITIAL Pond Drain	01/30/24		0	-	
	INITIAL Pond Drain		24hr		-	
	24 HR Leak Detection		24hr		-	
	INITIAL Pond Drain	02/09/24		0	-	no flow meter
Mar-24	24 HR Leak Detection		24hr		-	
	INITIAL Pond Drain	02/15/24		0	-	no flow meter
	24 HR Leak Detection		24hr		-	
	INITIAL Pond Drain	02/19/24		0	-	Liner pump not working. Aeration pumps not working. Work order put in, JD
	24 HR Leak Detection		24hr		-	
	INITIAL Pond Drain	02/28/24		94	93.90	
	24 HR Leak Detection		24hr			
	INITIAL Pond Drain	03/05/24		116	-	
	24 HR Leak Detection		24hr		116.00	
	INITIAL Pond Drain	03/12/24		694	-	
	24 HR Leak Detection		24hr		694.00	
	INITIAL Pond Drain	03/17/24		169	-	
	24 HR Leak Detection		24hr		169.00	
	INITIAL Pond Drain	03/24/24		943	-	
	24 HR Leak Detection		24 Hr		943.00	

Apr-24	INITIAL Pond Drain		24hr		126	-
	24 HR Leak Detection					126.00
	INITIAL Pond Drain	04/06/24			0	-
	24 HR Leak Detection		24hr			-
	INITIAL Pond Drain	04/14/24			875	-
	24 HR Leak Detection		24hr			875.00
May-24	INITIAL Pond Drain	04/19/24			302	-
	24 HR Leak Detection		24 hr			302.00
	INITIAL Pond Drain	05/04/24			245	-
	24 HR Leak Detection		24hr			245.00
	INITIAL Pond Drain	05/11/24			298	-
	24 HR Leak Detection		24hr			298.00
Jun-24	INITIAL Pond Drain	05/17/24			1,024	-
	24 HR Leak Detection		24hr			1,024.00
	INITIAL Pond Drain	05/26/24			1,774	-
	24 HR Leak Detection		24hr			1,774.00
	INITIAL Pond Drain	06/03/24			579	-
	24 HR Leak Detection		24hr			579.00
Jul-24	INITIAL Pond Drain	06/11/24			197	-
	24 HR Leak Detection		24hr			197.00
	INITIAL Pond Drain	06/16/24			215	-
	24 HR Leak Detection		24hr			215.00
	INITIAL Pond Drain	06/30/24			280	-
	24 HR Leak Detection		24hr			280.00
Aug-24	INITIAL Pond Drain	07/07/24			9,046	-
	24 HR Leak Detection		24hr			9,046.00
	INITIAL Pond Drain	07/14/24			320	-
	24 HR Leak Detection		24hr			320.00
	INITIAL Pond Drain	07/22/24			94	-
	24 HR Leak Detection		24hr			93.90
Sep-24	INITIAL Pond Drain	07/28/24			150	-
	24 HR Leak Detection		24hr			150.00
	INITIAL Pond Drain	08/05/24			2,091	-
	24 HR Leak Detection		24hr			2,091.00
	INITIAL Pond Drain	08/11/24			160	-
	24 HR Leak Detection		24hr			160.00
Oct-24	INITIAL Pond Drain	08/21/24			959	-
	24 HR Leak Detection		24hr			959.00
	INITIAL Pond Drain	08/25/24			120	-
	24 HR Leak Detection		24hr			120.00
	INITIAL Pond Drain	09/02/24			382	-
	24 HR Leak Detection		24hr			382.00
Nov-24	INITIAL Pond Drain	09/10/24			120	-
	24 HR Leak Detection		24hr			120.00
	INITIAL Pond Drain	09/14/24			177	-
	24 HR Leak Detection		24hr			177.00
	INITIAL Pond Drain	09/27/24			226	-
	24 HR Leak Detection		24hr			226.00

Oct-24	INITIAL Pond Drain	10/04/24			8,790	-	-
	24 HR Leak Detection		24hr			8,790.00	
	INITIAL Pond Drain	10/11/24			215	-	
	24 HR Leak Detection		24hr			215.00	
	INITIAL Pond Drain	10/17/24			750	-	
	24 HR Leak Detection		24hr			750.00	
Nov-24	INITIAL Pond Drain	10/24/24			486	-	
	24 HR Leak Detection		24hr			486.00	
	INITIAL Pond Drain	11/02/24			0	-	
	24 HR Leak Detection		24hr			-	
	INITIAL Pond Drain	11/09/24			397	-	
	24 HR Leak Detection		24hr			397.00	
Dec-24	INITIAL Pond Drain	11/17/24			140	-	
	24 HR Leak Detection		24hr			140.00	
	INITIAL Pond Drain	11/29/24			120	-	
	24 HR Leak Detection		24hr			120.00	
	INITIAL Pond Drain	12/07/24			156	-	
	24 HR Leak Detection		24hr			156.00	
	INITIAL Pond Drain	12/14/24			120	-	
	24 HR Leak Detection		24hr			120.00	
	INITIAL Pond Drain	12/22/24			108	-	
	24 HR Leak Detection		24hr			108.00	
	INITIAL Pond Drain	12/28/24			120	-	
	24 HR Leak Detection		24hr			120.00	

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Thursday, June 12, 2025 1:38 PM
To: Houston, Kristen /C
Subject: 2RF-125 - JRU Legg Recycling FACILITY ID [fAB1805930906]
Attachments: C-147 2RF-125 - JRU LEGG RECYCLING FACILITY [FAB1805930906] 06.12.2025.pdf

2RF-125 - JRU Legg Recycling FACILITY ID [fAB1805930906]

Good morning Ms. Houston,
 NMOCOD has reviewed the annual registration/permit extension request for 2RF-125 - JRU LEGG RECYCLING FACILITY ID [fAB1805930906] received from [373075] XTO PERMIAN OPERATING LLC on 6/11/2025 Application ID **473020**. The registration/permit extension request is approved with the following conditions of approval.

- 2RF-125 - JRU LEGG RECYCLING FACILITY ID [FAB1805930906] is approved for one (1) year of operation from the date of the previous registration/permit expiration date of February 27, 2025. The new registration/permit expiration date is February 27, 2026.
- [373075] XTO PERMIAN OPERATING LLC will continue to operate, maintain, and close the for 2RF-125 - JRU LEGG RECYCLING FACILITY ID [FAB1805930906] in compliance with 19.15.34 NMAC, to include but not limited to the performance of weekly inspections regardless of fluid levels in the containment; recording of detailed inspection reports; removal of debris, foreign objects and oil from the containment; and monthly reporting of recycling and reuse of produced water, drilling fluids, and liquid oil field waste via from C-148.
- [373075] XTO PERMIAN OPERATING LLC will maintain a liquid level in the containment that is at least equal to the weight of the liner plus 20%. [373075] XTO PERMIAN OPERATING LLC may maintain a higher liquid level if they choose.
- If less than 20% of the total fluid capacity is utilized every consecutive six months, operation of the facility is considered ceased and a notification of cessation of operations should be sent electronically through OCD Permitting. An extension to extend the cessation of operations, not to exceed six months, may be submitted using a C-147 form through the OCD Online system.
- If after that 6-month extension period, the containment is not utilized at a minimum of 20% fluid capacity, no additional extensions would be granted, and the operator would be directed to remove all fluids and proceed with the closure requirements.
- The recycling containment is bonded pursuant to 19.15.8 NMAC per 19.15.34.15(A)(2) NMAC. Water reuse and recycling from for 2RF-125 - JRU LEGG RECYCLING FACILITY ID [FAB1805930906] is limited to wells owned or operated by [373075] XTO PERMIAN OPERATING LLC.
- A minimum of 3-feet freeboard must be maintained in the recycling containment at all times.
- [373075] XTO PERMIAN OPERATING LLC will comply with 19.15.29 NMAC Releases in the event of any release of produced water or produced water or other oil field wastes at for 2RF-125 - JRU Legg Recycling FACILITY ID [fAB1805930906]. [373075] XTO PERMIAN OPERATING LLC will comply with all other OCD rules.
- [373075] XTO PERMIAN OPERATING LLC must perform weekly inspections of the containment and leak detection system.
- [373075] XTO PERMIAN OPERATING LLC must submit monthly reports of recycling and reuse of produced water, on NMOCOD form C-148 through OCD Online even if there is zero activity.
- If [373075] XTO PERMIAN OPERATING LLC wishes to extend the registration/permit past February 27, 2026, a registration/permit extension request must be submitted to OCD. Extension requests are reviewed on a case-by-case basis and evaluated on their merit. Extensions are considered for a maximum length of one year. Additional requests must be submitted to OCD through OCD Online on a Form C-147 (long form) as an Extension request and should include a formal extension request letter, a summary of the prior

registration/permit period inspection reports, and the copies of the detailed inspection records for the prior permit period. The extension request should be submitted no later than January 27, 2026.

Please let me know if you have any additional questions.

Best regards,

Victoria Venegas ● Environmental Specialist Advanced
EMNRD - Oil Conservation Division
506 W. Texas Ave. Artesia, NM 88210
575.909.0269 | Victoria.Venegas@emnrd.nm.gov

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 473020

CONDITIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 473020
	Action Type: [C-147] Water Recycle Long (C-147L)

CONDITIONS

Created By	Condition	Condition Date
vvenegas	• 2RF-125 - JRU LEGG RECYCLING FACILITY ID [FAB1805930906]is approved for one (1) year of operation from the date of the previous registration/permit expiration date of February 27, 2025. The new registration/permit expiration date is February 27, 2026. • If [373075] XTO PERMIAN OPERATING LLC wishes to extend the registration/permit past February 27, 2026, a registration/permit extension request must be submitted to OCD no later than January 27, 2026.	6/12/2025