



May 28, 2025

**New Mexico Oil Conservation Division**

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

**Re: Closure Request  
Ross Draw 25 #31 Battery  
Incident Number nAPP2433036643  
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 assessment, delineation, and soil sampling activities at the *Ross Draw 25 #31 Battery* (Site). The purpose of the site assessment and soil sampling activities was to assess for the presence or absence of impacts to soil following a release of produced water within a lined containment. Based on field observations, field screening activities, and soil sample laboratory analytical results, XTO is submitting this *Closure Request*, describing site assessment and delineation activities that have occurred and requesting no further action for Incident Number nAPP2433036643.

**SITE DESCRIPTION AND RELEASE SUMMARY**

The Site is located in Unit D, Section 25, Township 26 South, Range 29 East in Eddy County, New Mexico (32.019437°, -103.941858°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM).

On November 24, 2024, corrosion of a dump line resulted in the release of 35 barrels (bbls) of produced water into a lined containment. 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) and an Initial C-141 Application (C-141) on November 25, 2024. The release was assigned Incident Number nAPP2433036643.

**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 2021, a soil boring permitted by New Mexico Office of the State Engineer (C-4561) was completed approximately 0.1 miles northeast of the Site utilizing hollow stem auger method. Soil boring C-4561 was drilled to a depth of 105 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

XTO Energy, Inc.  
Closure Request  
Ross Draw 25 #31 Battery

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 105 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 dry wash, located approximately 791 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 potentially underlain by unstable geology (medium potential karst designation area).

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

- Benzene: 10 milligrams per kilogram (mg/kg)
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg
- Total petroleum hydrocarbons (TPH): 100 mg/kg
- Chloride: 600 mg/kg

## LINER INTEGRITY INSPECTION ACTIVITIES

After a review of the C-141, internal documents, and initial release photographs, it was confirmed the release occurred within the 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 March 12, 2025. On March 17, 2025, the lined containment was inspected by Ensolum personnel and inspection results indicated the presence of a few liner holes in one general area. Photographic documentation of the liner inspection is included in Appendix B.

## DELINEATION SOIL SAMPLING ACTIVITIES

On March 21, 2025, Ensolum personnel returned to the Site to complete delineation activities. Four delineation soil samples, SS01 through SS04, were collected outside the lined containment from a depth of 0.5 feet bgs to ensure the release did not overflow from the containment walls. One borehole, BH01, was advanced via hand auger in the location of the largest hole in the liner identified in the inspection. The borehole was advanced to a terminal depth of 1-foot bgs and delineation soil samples were collected from the borehole at 0.5 and 1-foot bgs. The delineation soil samples were field screened for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID) and chloride utilizing Hach® chloride QuanTab® test strips. Field screening results and observations were logged on a lithologic/soil sampling log, which is included in Appendix C. The delineation soil sample locations were mapped utilizing a handheld Global Positioning System (GPS) unit and are depicted on Figure 2. Photographic documentation is included in Appendix B.

The soil samples were placed directly into pre-cleaned glass jars, labeled with the location, date, time, sampler name, method of analysis, and immediately placed on ice. The soil samples were transported under strict chain-of-custody procedures to Cardinal Laboratories (Cardinal) in Hobbs, New Mexico, for analysis of the following contaminants of concern (COCs): BTEX following United States Environmental Protection Agency (EPA) Method 8021B; TPH-gasoline range organics (GRO), TPH-diesel range organics (DRO), and TPH-oil range organics (ORO) following EPA Method 8015M/D; and chloride following Standard Method SM4500.

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## LABORATORY ANALYTICAL RESULTS

Delineation soil samples, SS01 through SS04, collected from a depth of 0.5 feet bgs, indicated all COCs were in compliance with the Site Closure Criteria, confirming the release remained in the lined containment. Laboratory analytical results for delineation soil samples BH01 and BH01A, collected at depths of 0.5 feet and 1-foot bgs, indicated all COCs were in compliance with Site Closure Criteria, indicating no impacted soil exists beneath the liner. Laboratory analytical results are summarized in Table 1 and the laboratory analytical reports are included in Appendix D.

## CLOSURE REQUEST

Liner integrity inspection and delineation activities were conducted at the Site to address the November 24, 2024, release of produced water within a lined containment at the Site. Laboratory analytical results for all delineation soil samples indicated that all COC concentrations were compliant with the Site Closure Criteria. Based on the soil sample analytical results, no impacted soil was identified, and no further remediation was required. XTO has patched the liner following completion of delineation activities and documentation is included in the photographic log in Appendix B.

Delineation soil sampling activities determined that no impacted soil exists beneath the lined containment. XTO believes these remedial actions are protective of human health, the environment, and groundwater. As such, XTO respectfully requests closure for Incident Number nAPP2433036643.

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**



Kim Thomason  
Senior Technician



Tacoma Morrissey  
Associate Principal

cc: Robert Woodall, XTO  
Kaylan Dirkx, XTO  
BLM

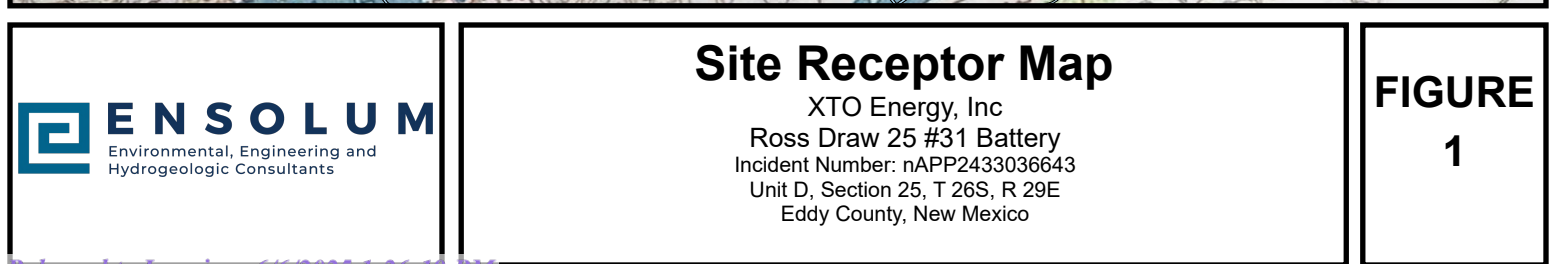
### Appendices:

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



FIGURES









## Delineation Soil Sample Locations

XTO Energy, Inc  
Ross Draw 25 #31 Battery  
Incident Number: nAPP2433036643  
Unit D, Section 25, T 26S, R 29E  
Eddy County, New Mexico

**FIGURE**  
**2**



TABLES



**TABLE 1**  
**SOIL SAMPLE ANALYTICAL RESULTS**  
 Ross Draw 25 #31 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	NE	100	600
Delineation Soil Samples										
SS01	03/21/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	240
SS02	03/21/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	64.0
SS03	03/21/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	32.0
SS04	03/21/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	320
BH01	03/21/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	464
BH01A	03/21/2025	1	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	304

## 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





## APPENDIX A

### Referenced Well Records

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# WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

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

OSE DJT AUG 17 2021 PM 3:11

1. GENERAL AND WELL LOCATION	OSE POD NO. (WELL NO.) POD1 (BH-01)		WELL TAG ID NO. n/a		OSE FILE NO(S). C-4561			
	WELL OWNER NAME(S) XTO Energy (Kyle Littrell)				PHONE (OPTIONAL)			
	WELL OWNER MAILING ADDRESS 6401 Holiday Hill Dr.				CITY Midland	STATE TX	ZIP 79707	
	WELL LOCATION (FROM GPS)	DEGREES LATITUDE 32	MINUTES 1	SECONDS 14.17	N	* ACCURACY REQUIRED: ONE TENTH OF A SECOND		
		LONGITUDE 103	56	30.83	W	* DATUM REQUIRED: WGS 84		
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS - PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE SE SW Sec. 31T23S R33E								
2. DRILLING & CASING INFORMATION	LICENSE NO. 1249		NAME OF LICENSED DRILLER Jackie D. Atkins			NAME OF WELL DRILLING COMPANY Atkins Engineering Associates, Inc.		
	DRILLING STARTED 07/28/2021		DRILLING ENDED 07/28/2021		DEPTH OF COMPLETED WELL (FT) temporary well material	BORE HOLE DEPTH (FT) 105	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 type="checkbox"/> AIR <input type="checkbox"/> MUD ADDITIVES - SPECIFY:							
	DRILLING METHOD: <input type="checkbox"/> ROTARY <input type="checkbox"/> HAMMER <input type="checkbox"/> CABLE TOOL <input checked="" type="checkbox"/> OTHER - SPECIFY: Hollow Stem Auger							
	DEPTH (feet bgl)		BORE HOLE DIAM (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)	CASING CONNECTION TYPE (add coupling diameter)	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)	SLOT SIZE (inches)
	FROM	TO						
	0	105	±6.5	Boring- HSA	--	--	--	--
3. ANNULAR MATERIAL	DEPTH (feet bgl)		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL	AMOUNT (cubic feet)	METHOD OF PLACEMENT		
	FROM	TO						

FOR OSE INTERNAL USE

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

FILE NO.	C-4561	POD NO.	POD1	TRN NO.	701043
LOCATION	24S-29E-24 433			WELL TAG ID NO.	PAGE 1 OF 2

DSE DTI AUG 17 2021 PM3:11

4. HYDROGEOLOGIC LOG OF WELL	DEPTH (feet bgl)		THICKNESS (feet)	COLOR AND TYPE OF MATERIAL ENCOUNTERED - INCLUDE WATER-BEARING CAVITIES OR FRACTURE ZONES (attach supplemental sheets to fully describe all units)	WATER BEARING? (YES / NO)	ESTIMATED YIELD FOR WATER-BEARING ZONES (gpm)
	FROM	TO				
	0	5	5	Caliche, poor- moderate consolidation, Off white-tan	Y    ✓ N	
	5	10	5	Sand, fine grained, poorly graded, with caliche gravel, Reddish Brown	Y    ✓ N	
	10	25	15	Clayey Sand, fine grained, poorly graded, Reddish Brown	Y    ✓ N	
	25	30	5	Silty Sand, fine grained, poorly graded, Reddish Brown , Dry	Y    ✓ N	
	30	45	15	Gravelly Silty, some gypsum, graded, Reddish Brown , Dry	Y    ✓ N	
	45	60	15	Siltstone, poorly cemented, Reddish Brown, Dry	Y    ✓ N	
	60	105	45	Claystone, Low plasticity,cohesive, some gypsum, Reddish Brown-Dark , moist	Y    ✓ N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
METHOD USED TO ESTIMATE YIELD OF WATER-BEARING STRATA: <input type="checkbox"/> PUMP <input type="checkbox"/> AIR LIFT <input type="checkbox"/> BAILER <input type="checkbox"/> OTHER – SPECIFY:					TOTAL ESTIMATED WELL YIELD (gpm):                      0.00	

5. TEST; RIG SUPERVISION	WELL TEST	TEST RESULTS - ATTACH A COPY OF DATA COLLECTED DURING WELL TESTING, INCLUDING DISCHARGE METHOD, START TIME, END TIME, AND A TABLE SHOWING DISCHARGE AND DRAWDOWN OVER THE TESTING PERIOD.
	MISCELLANEOUS INFORMATION: Temporary well materials removed and the soil boring backfilled using drill cuttings from total depth to ten feet below ground surface, then hydrated bentonite chips from ten feet below ground surface to surface. Logs adapted from WSP on-site geologist.	
	PRINT NAME(S) OF DRILL RIG SUPERVISOR(S) THAT PROVIDED ONSITE SUPERVISION OF WELL CONSTRUCTION OTHER THAN LICENSEE: Shane Eldridge, Carmelo Trevino, Cameron Pruitt	

6. SIGNATURE	THE UNDERSIGNED HEREBY CERTIFIES THAT, TO THE BEST OF HIS OR HER KNOWLEDGE AND BELIEF, THE FOREGOING IS A TRUE AND CORRECT RECORD OF THE ABOVE DESCRIBED HOLE AND THAT HE OR SHE WILL FILE THIS WELL RECORD WITH THE STATE ENGINEER AND THE PERMIT HOLDER WITHIN 30 DAYS AFTER COMPLETION OF WELL DRILLING:	
	 Jackie D. Atkins	08/16/2021
	SIGNATURE OF DRILLER / PRINT SIGNED NAME	DATE

FOR OSE INTERNAL USE		WR-20 WELL RECORD & LOG (Version 06/30/2017)	
FILE NO.	C-456	POD NO.	POD 1
LOCATION	24S-29E-74433	TRN NO.	701043
		WELL TAG ID NO.	PAGE 2 OF 2



# PLUGGING RECORD



**NOTE: A Well Plugging Plan of Operations shall be approved by the State Engineer prior to plugging - 19.27.4 NMAC**

## I. GENERAL / WELL OWNERSHIP:

State Engineer Well Number: C-4561- POD1

Well owner: XTO ENERGY (Kyle Littrell)

Phone No.: 432.682.8873

Mailing address: 6401 Holiday Hill Dr.

City: Midland

State: Texas

Zip code: 79707

## II. WELL PLUGGING INFORMATION:

1) Name of well drilling company that plugged well: Jackie D. Atkins (Atkins Engineering Associates Inc.)

2) New Mexico Well Driller License No.: 1249 Expiration Date: 04/30/23

3) Well plugging activities were supervised by the following well driller(s)/rig supervisor(s): Shane Eldridge, Cameron Pruitt, Carmelo Trevino

4) Date well plugging began: 07/27/2021 8/12/2021 Date well plugging concluded: 07/27/2021 8/12/2021 *Per Chris Cortez*

5) GPS Well Location: Latitude: 32 deg, 1 min, 14.17 sec  
Longitude: 103 deg, 56 min, 30.83 sec, WGS 84

6) Depth of well confirmed at initiation of plugging as: 105 ft below ground level (bgl),  
by the following manner: weighted tape

7) Static water level measured at initiation of plugging: n/a ft bgl

8) Date well plugging plan of operations was approved by the State Engineer: 07/20/2021

9) Were all plugging activities consistent with an approved plugging plan? Yes If not, please describe differences between the approved plugging plan and the well as it was plugged (attach additional pages as needed):



10) **Log of Plugging Activities** - Label vertical scale with depths, and indicate separate plugging intervals with horizontal lines as necessary to illustrate material or methodology changes. Attach additional pages if necessary.

<u>Depth</u> (ft bgl)	<u>Plugging Material Used</u> (include any additives used)	<u>Volume of Material Placed</u> (gallons)	<u>Theoretical Volume of Borehole/ Casing</u> (gallons)	<u>Placement Method</u> (tremie pipe, other)	<u>Comments</u> ("casing perforated first", "open annular space also plugged", etc.)
	0-10' Hydrated Bentonite	Approx. 16 gallons	16 gallons	Augers	
	10'-105' Drill Cuttings	Approx. 175 gallons	175 gallons	Boring	

MULTIPLY		BY	AND OBTAIN
cubic feet	x	7.4805	= gallons
cubic yards	x	201.97	= gallons

I, Jackie D. Atkins, say that I am familiar with the rules of the Office of the State Engineer pertaining to the plugging of wells and that each and all of the statements in this Plugging Record and attachments are true to the best of my knowledge and belief.

Jack Atkins

08/16/2021

Date \_\_\_\_\_



## APPENDIX B

### Photographic Log

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**Photographic Log**

XTO Energy, Inc.  
Ross Draw 25 #31 Battery  
nAPP2433036643



Photograph: 1                      Date: 3/21/2025  
Description: Well Location Sign  
View: Direct



Photograph: 2                      Date: 3/21/2025  
Description: Liner Inspection Activities  
View: Northwest



Photograph: 3                      Date: 3/21/2025  
Description: Liner Inspection Activities  
View: North



Photograph: 4                      Date: 3/21/2025  
Description: Delineation and Patching Activities  
View: West


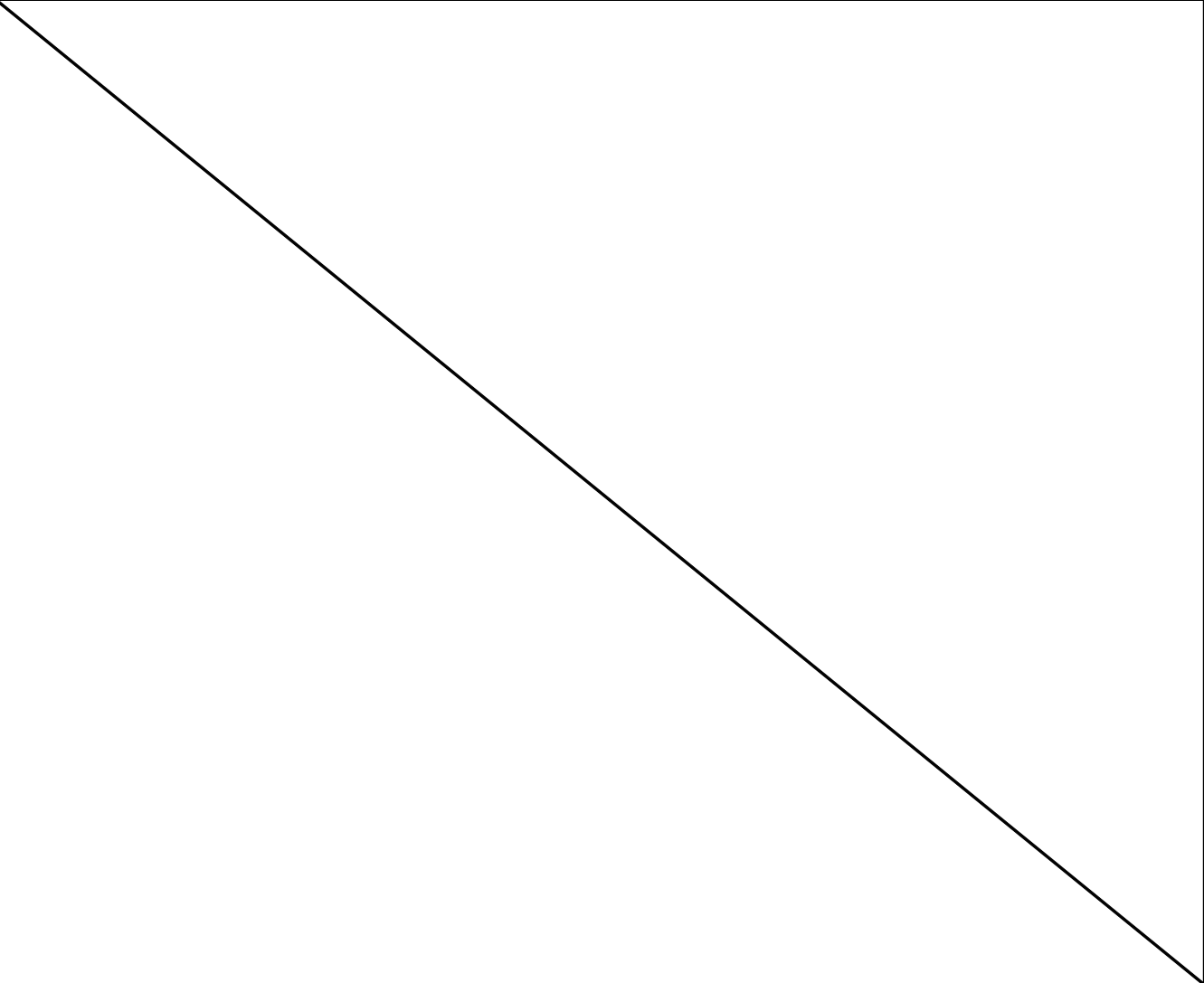


## APPENDIX C

### Lithologic / Soil Sampling Logs

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 <b>ENSOLUM</b>		Sample Name: BH01		Date: 3/21/2025				
		Site Name: Ross Draw 25 #31 Battery						
		Incident Number: nAPP2433036643						
		Job Number: 03C1558581						
<b>LITHOLOGIC / SOIL SAMPLING LOG</b>								
Coordinates: 32.019431, -103.941817			Logged By: ER		Method: Hand Auger			
			Hole Diameter: 4"		Total Depth: 1-foot			
Comments: Field screening conducted with HACH Chloride Test Strips and PID for chloride and vapor, respectively. Chloride test performed with 1:4 dilution factor of soil to distilled water. A 40% 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
						0	SP	(0-1') SAND, red brown, with silt
D	515	0.4	N	BH01	0.5			
D	235	0.5	N	BH01A	1	1		
Total Depth @ 1-foot bgs								
								



## APPENDIX D

### Laboratory Analytical Reports & Chain of Custody Documentation

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

March 28, 2025

TRACY HILLARD

ENSOLUM, LLC

705 W WADLEY AVE.

MIDLAND, TX 79705

RE: ROSS DRAW 25 #31 BATTERY ( 581 )

Enclosed are the results of analyses for samples received by the laboratory on 03/24/25 12:15.

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

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

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

Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received: 03/24/2025  
 Reported: 03/28/2025  
 Project Name: ROSS DRAW 25 #31 BATTERY ( 581 )  
 Project Number: 03C1558581  
 Project Location: XTO 32.019243-103.94169

Sampling Date: 03/21/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: BH 01 .5 (H251701-01)**

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	03/25/2025	ND	1.92	95.9	2.00	4.60	
Toluene*	<0.050	0.050	03/25/2025	ND	2.00	100	2.00	0.738	
Ethylbenzene*	<0.050	0.050	03/25/2025	ND	1.98	99.0	2.00	3.51	
Total Xylenes*	<0.150	0.150	03/25/2025	ND	6.13	102	6.00	1.89	
Total BTX	<0.300	0.300	03/25/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 110 % 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
Chloride	464	16.0	03/25/2025	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/25/2025	ND	202	101	200	1.37	
DRO >C10-C28*	<10.0	10.0	03/25/2025	ND	188	93.8	200	1.89	
EXT DRO >C28-C36	<10.0	10.0	03/25/2025	ND					

Surrogate: 1-Chlorooctane 86.9 % 44.4-145

Surrogate: 1-Chlorooctadecane 81.0 % 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:**

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

Received: 03/24/2025  
 Reported: 03/28/2025  
 Project Name: ROSS DRAW 25 #31 BATTERY ( 581 )  
 Project Number: 03C1558581  
 Project Location: XTO 32.019243-103.94169

Sampling Date: 03/21/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: BH 01A 1 (H251701-02)**

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	03/25/2025	ND	1.92	95.9	2.00	4.60		
Toluene*	<0.050	0.050	03/25/2025	ND	2.00	100	2.00	0.738		
Ethylbenzene*	<0.050	0.050	03/25/2025	ND	1.98	99.0	2.00	3.51		
Total Xylenes*	<0.150	0.150	03/25/2025	ND	6.13	102	6.00	1.89		
Total BTEX	<0.300	0.300	03/25/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 116 % 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	
Chloride	304	16.0	03/25/2025	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/25/2025	ND	202	101	200	1.37	
DRO >C10-C28*	<10.0	10.0	03/25/2025	ND	188	93.8	200	1.89	
EXT DRO >C28-C36	<10.0	10.0	03/25/2025	ND					

Surrogate: 1-Chlorooctane 86.6 % 44.4-145

Surrogate: 1-Chlorooctadecane 82.4 % 40.6-153

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



---

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---

### Notes and Definitions

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

---

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

---

Celey D. Keene, Lab Director/Quality Manager



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

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]



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

March 28, 2025

TRACY HILLARD

ENSOLUM, LLC

705 W WADLEY AVE.

MIDLAND, TX 79705

RE: ROSS DRAW 25 #31 BATTERY ( 581 )

Enclosed are the results of analyses for samples received by the laboratory on 03/24/25 12:15.

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

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

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: 03/24/2025  
 Reported: 03/28/2025  
 Project Name: ROSS DRAW 25 #31 BATTERY ( 581 )  
 Project Number: 03C1558581  
 Project Location: XTO 32.019243-103.94169

Sampling Date: 03/21/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: SS 01 .5 (H251703-01)**

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	03/25/2025	ND	1.92	95.9	2.00	4.60	
Toluene*	<0.050	0.050	03/25/2025	ND	2.00	100	2.00	0.738	
Ethylbenzene*	<0.050	0.050	03/25/2025	ND	1.98	99.0	2.00	3.51	
Total Xylenes*	<0.150	0.150	03/25/2025	ND	6.13	102	6.00	1.89	
Total BTEX	<0.300	0.300	03/25/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 110 % 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	
Chloride	240	16.0	03/25/2025	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/25/2025	ND	202	101	200	1.37	
DRO >C10-C28*	<10.0	10.0	03/25/2025	ND	188	93.8	200	1.89	
EXT DRO >C28-C36	<10.0	10.0	03/25/2025	ND					

Surrogate: 1-Chlorooctane 85.4 % 44.4-145

Surrogate: 1-Chlorooctadecane 81.0 % 40.6-153

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\*=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: 03/24/2025  
 Reported: 03/28/2025  
 Project Name: ROSS DRAW 25 #31 BATTERY ( 581 )  
 Project Number: 03C1558581  
 Project Location: XTO 32.019243-103.94169

Sampling Date: 03/21/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: SS 02 .5 (H251703-02)**

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	03/25/2025	ND	1.92	95.9	2.00	4.60		
Toluene*	<0.050	0.050	03/25/2025	ND	2.00	100	2.00	0.738		
Ethylbenzene*	<0.050	0.050	03/25/2025	ND	1.98	99.0	2.00	3.51		
Total Xylenes*	<0.150	0.150	03/25/2025	ND	6.13	102	6.00	1.89		
Total BTEX	<0.300	0.300	03/25/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 113 % 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	
Chloride	64.0	16.0	03/25/2025	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/25/2025	ND	202	101	200	1.37	
DRO >C10-C28*	<10.0	10.0	03/25/2025	ND	188	93.8	200	1.89	
EXT DRO >C28-C36	<10.0	10.0	03/25/2025	ND					

Surrogate: 1-Chlorooctane 90.8 % 44.4-145

Surrogate: 1-Chlorooctadecane 85.9 % 40.6-153

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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: 03/24/2025  
 Reported: 03/28/2025  
 Project Name: ROSS DRAW 25 #31 BATTERY ( 581 )  
 Project Number: 03C1558581  
 Project Location: XTO 32.019243-103.94169

Sampling Date: 03/21/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: SS 03 .5 (H251703-03)**

BTX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	03/25/2025	ND	1.92	95.9	2.00	4.60		
Toluene*	<0.050	0.050	03/25/2025	ND	2.00	100	2.00	0.738		
Ethylbenzene*	<0.050	0.050	03/25/2025	ND	1.98	99.0	2.00	3.51		
Total Xylenes*	<0.150	0.150	03/25/2025	ND	6.13	102	6.00	1.89		
Total BTX	<0.300	0.300	03/25/2025	ND						

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: KV						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	03/25/2025	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/25/2025	ND	202	101	200	1.37	
DRO >C10-C28*	<10.0	10.0	03/25/2025	ND	188	93.8	200	1.89	
EXT DRO >C28-C36	<10.0	10.0	03/25/2025	ND					

Surrogate: 1-Chlorooctane 82.2 % 44.4-145

Surrogate: 1-Chlorooctadecane 78.3 % 40.6-153

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\*=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: 03/24/2025  
 Reported: 03/28/2025  
 Project Name: ROSS DRAW 25 #31 BATTERY ( 581 )  
 Project Number: 03C1558581  
 Project Location: XTO 32.019243-103.94169

Sampling Date: 03/21/2025  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: SS 04 .5 (H251703-04)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	03/25/2025	ND	1.92	95.9	2.00	4.60		
Toluene*	<0.050	0.050	03/25/2025	ND	2.00	100	2.00	0.738		
Ethylbenzene*	<0.050	0.050	03/25/2025	ND	1.98	99.0	2.00	3.51		
Total Xylenes*	<0.150	0.150	03/25/2025	ND	6.13	102	6.00	1.89		
Total BTEX	<0.300	0.300	03/25/2025	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	
Chloride	320	16.0	03/25/2025	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/25/2025	ND	203	102	200	1.94	
DRO >C10-C28*	<10.0	10.0	03/25/2025	ND	195	97.4	200	1.12	
EXT DRO >C28-C36	<10.0	10.0	03/25/2025	ND					

Surrogate: 1-Chlorooctane 68.3 % 44.4-145

Surrogate: 1-Chlorooctadecane 61.4 % 40.6-153

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Celey D. Keene, Lab Director/Quality Manager



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### Notes and Definitions

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

---

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\*=Accredited Analyte

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

---

Celey D. Keene, Lab Director/Quality Manager



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

### CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]



**From:** [Tacoma Morrissey](#)  
**To:** [Wells, Shelly, EMNRD](#)  
**Subject:** [EXTERNAL] Re: NAPP2433036643 ROSS DRAW 25 #31 BATTERY  
**Date:** Friday, June 6, 2025 12:19:46 PM  
**Attachments:** [Outlook-co5m0mke.png](#)  
[Outlook-wpuw2u2u.png](#)  
[Outlook-1j1kklpj.png](#)  
[Outlook-g2hyvj0c](#)  
[Photolog ROSS DRAW 25 #31 BATTERY\\_nAPP2433036643.pdf](#)

**CAUTION:** This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Hi Shelly,

Hope you are having a good Friday. Thank you for reviewing the report and reaching out for additional information. There were three tears in the liner within a few feet of each other, which is where the delineation occurred and where historically we would focus the report in these instances. Photo 4 in the photolog in the report shows the three new patches where the tears were located and where the delineation occurred. I have attached additional photos from the overall liner inspection that help illustrate the liner condition in the rest of the containment. I've discussed with our PMs and we'll include more liner inspection photos for Sites where delineation occurs going forward. Please let me know if you need any additional information. I appreciate the feedback!

Thanks,



**Tacoma Morrissey**

Associate Principal  
337-257-8307

**Ensolum, LLC**

**in f X**

---

**From:** Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>  
**Sent:** Friday, June 6, 2025 10:33 AM  
**To:** Tacoma Morrissey <tmorrissey@ensolum.com>  
**Subject:** NAPP2433036643 ROSS DRAW 25 #31 BATTERY

[ \*\*EXTERNAL EMAIL\*\* ]

Good morning Tacoma,

I am reviewing the remediation closure report submitted for the following release NAPP2433036643 ROSS DRAW 25 #31 BATTERY and have questions for you. In the remediation summary it says: "the lined containment was inspected by Ensolum personnel and inspection results indicated the presence of a few liner holes in one general area." Can you be more specific regarding how many holes were found? As this

closure centers around the liner inspection, can you please provide more photos of the inspected battery? Two photos focus on the holes and one on the sign so there is a lack of photos for the liner inspection.

Thank you,

Shelly

Shelly Wells \* Environmental Specialist-Advanced  
Environmental Bureau  
EMNRD-Oil Conservation Division  
1220 S. St. Francis Drive|Santa Fe, NM 87505  
(505)469-7520 [Shelly.Wells@emnrd.nm.gov](mailto:Shelly.Wells@emnrd.nm.gov)  
<http://www.emnrd.state.nm.us/OCD/>



**Photographic Log**  
XTO Energy, Inc.  
Ross Draw 25 #31 Battery  
nAPP2433036643

119°SE (T) LAT: 32.019355 LON: -103.941892 ±13ft ▲ 2953ft



Photograph: 1 Date: 3/17/2025  
Description: Liner Inspection Activities  
View: Southeast

350°N (T) LAT: 32.019367 LON: -103.941903 ±13ft ▲ 2954ft



Photograph: 2 Date: 3/17/2025  
Description: Liner Inspection Activities  
View: North

85°E (T) LAT: 32.019361 LON: -103.941911 ±13ft ▲ 2954ft



Photograph: 3 Date: 3/17/2025  
Description: Liner Inspection Activities  
View: East

2°N (T) LAT: 32.019433 LON: -103.941999 ±9ft ▲ 2956ft



Photograph: 4 Date: 3/17/2025  
Description: Liner Inspection Activities  
View: North

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 468316

**QUESTIONS**

Operator:  XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:  5380
	Action Number:  468316
	Action Type:  [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

Prerequisites	
Incident ID (n#)	nAPP2433036643
Incident Name	NAPP2433036643 ROSS DRAW 25 #31 BATTERY @ 0
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received

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

Site Name	ROSS DRAW 25 #31 BATTERY
Date Release Discovered	11/24/2024
Surface Owner	Federal

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

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

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

Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Corrosion   Dump Line   Produced Water   Released: 35 BBL   Recovered: 35 BBL   Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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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 468316

**QUESTIONS (continued)**

Operator:  XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:
	5380
	Action Number:
	468316
Action Type:	
[C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

**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	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
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**

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury.

The source of the release has been stopped	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	Not answered.

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

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

I hereby agree and sign off to the above statement	Name: Colton Brown Title: Environmental Advisor Email: colton.s.brown@exxonmobil.com Date: 11/25/2024
--	--



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Phone: (505) 476-3441

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

QUESTIONS, Page 3

Action 468316

**QUESTIONS (continued)**

Operator:  XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:  5380
	Action Number:  468316
	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
<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 500 and 1000 (ft.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 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 1 and 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Zero feet, overlying, or within area
Categorize the risk of this well / site being in a karst geology	Medium
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	No

**Soil Contamination Sampling:** (Provide the highest observable value for each, in milligrams per kilograms.)

Chloride (EPA 300.0 or SM4500 Cl B)	464
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	0
GRO+DRO (EPA SW-846 Method 8015M)	0
BTEX (EPA SW-846 Method 8021B or 8260B)	0
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	03/17/2025
On what date will (or did) the final sampling or liner inspection occur	03/21/2025
On what date will (or was) the remediation complete(d)	03/21/2025
What is the estimated surface area (in square feet) that will be reclaimed	8342
What is the estimated volume (in cubic yards) that will be reclaimed	0
What is the estimated surface area (in square feet) that will be remediated	8342
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.



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Action 468316

**QUESTIONS (continued)**

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	Action Number:  468316
	Action Type:  [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Remediation Plan (continued)</b>	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
<b>This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:</b>	
<i>(Select all answers below that apply.)</i>	
(Ex Situ) Excavation and <b>off-site</b> disposal (i.e. dig and haul, hydrovac, etc.)	<i>Not answered.</i>
(Ex Situ) Excavation and <b>on-site</b> remediation (i.e. On-Site Land Farms)	<i>Not answered.</i>
(In Situ) Soil Vapor Extraction	<i>Not answered.</i>
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	<i>Not answered.</i>
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	<i>Not answered.</i>
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	<i>Not answered.</i>
Ground Water Abatement pursuant to 19.15.30 NMAC	<i>Not answered.</i>
OTHER (Non-listed remedial process)	<b>Yes</b>
Other Non-listed Remedial Process. Please specify	<b>analytical results were below action levels</b>
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
I hereby agree and sign off to the above statement	Name: Robert Woodall Title: Environmental Analyst Email: <a href="mailto:robert.d.woodall@exxonmobil.com">robert.d.woodall@exxonmobil.com</a> Date: 05/28/2025
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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Action 468316

QUESTIONS (continued)

Operator:  XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:  5380
	Action Number:  468316
	Action Type:  [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

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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Action 468316

**QUESTIONS (continued)**

Operator:  XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:  5380
	Action Number:  468316
	Action Type:  [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

Sampling Event Information	
Last sampling notification (C-141N) recorded	441878
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	03/21/2025
What was the (estimated) number of samples that were to be gathered	10
What was the sampling surface area in square feet	2000

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	No
All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion	Yes
What was the total surface area (in square feet) remediated	8342
What was the total volume (cubic yards) remediated	0
All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX, and 10 mg/kg Benzene	Yes
What was the total surface area (in square feet) reclaimed	8342
What was the total volume (in cubic yards) reclaimed	0
Summarize any additional remediation activities not included by answers (above)	Liner integrity inspection and delineation activities were conducted at the Site to address the November 24, 2024, release of produced water within a lined containment at the Site. Laboratory analytical results for all delineation soil samples indicated that all COC concentrations were compliant with the Site Closure Criteria. Based on the soil sample analytical results, no impacted soil was identified, and no further remediation was required. XTO has patched the tears in the liner following completion of delineation activities. Delineation of potential impacts at the Site determined no soil that exceeded Site Closure Criteria was located below the lined containment. XTO believes these remedial actions are protective of human health, the environment, and groundwater. As such, XTO respectfully requests closure for Incident Number nAPP2433036643.
<i>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>	
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: Robert Woodall Title: Environmental Analyst Email: robert.d.woodall@exxonmobil.com Date: 05/28/2025

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Action 468316

QUESTIONS (continued)

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QUESTIONS

Reclamation Report	
Only answer the questions in this group if all reclamation steps have been completed.	
Requesting a reclamation approval with this submission	No

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CONDITIONS

Action 468316

CONDITIONS

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

Created By	Condition	Condition Date
scwells	None	6/6/2025