



September 12, 2025

New Mexico Oil Conservation Division

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

**Re: Deferral Request
PLU Big Sinks 03 25 31 Battery
Incident Number nAPP2516632826
Eddy County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of XTO Energy, Inc (XTO), has prepared this *Deferral Request* to document the findings of a liner integrity inspection and delineation activities conducted at the PLU Big Sinks 03 25 31 Battery (Site) following a release of produced water within a lined containment. Based on field observations and soil sample laboratory analytical results, XTO is submitting this *Deferral Request*, describing site assessment and delineation activities that have occurred and requesting deferral of final remediation for Incident Number nAPP2516632826 until the Site is reconstructed, and/or the well pad is abandoned.

SITE DESCRIPTION AND RELEASE SUMMARY

The Site is located in Unit I, Section 04, Township 25 South, Range 31 East, in Eddy County, New Mexico (32.16463°, -103.77721°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM).

On June 14, 2025, the seal on a produced water pump failed, resulting in the release of approximately 30 barrels (bbls) of produced water into a lined containment. A vacuum truck was dispatched to the Site to recover free-standing fluids and all fluids were recovered. The lined containment was cleaned of all debris and power washed to remove any residual fluids. XTO reported the release to the New Mexico Oil Conservation Division (NMOCD) via a Notification of Release (NOR) on June 15, 2025, and subsequently submitted an Initial C-141 Application (C-141) on June 17, 2025. The release was assigned Incident Number nAPP2516632826.

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 the nearest groundwater well data. The closest permitted groundwater well with depth to groundwater data is a New Mexico Office of the State Engineer (OSE) permitted well (C-4762), located approximately 0.36 miles southeast of the Site. The soil boring was advanced on August 9, 2023, to a

XTO Energy, Inc
Deferral Request
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total depth of 110 feet bgs. No groundwater was encountered during drilling activities. The well was properly plugged with drill cuttings and hydrated bentonite. All wells used for depth to groundwater determination are presented on Figure 1. The Well Record and Log is included in Appendix A.

The closest continuously flowing or significant watercourse to the Site is a freshwater emergent wetland located approximately 1.5 miles south 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 potentially unstable geology (low potential karst designation area).

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

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

LINER INTEGRITY INSPECTION ACTIVITIES

A 48-hour advanced notice of the liner inspection was submitted to the NMOCD on August 21, 2025. On August 26, 2025, Ensolum personnel visited the Site to conduct an inspection of the lined containment. Inspection results indicated that the lined containment contained a small tear on the liner floor. Based on the inspection results, delineation soil sampling activities were warranted.

DELINEATION SOIL SAMPLING ACTIVITIES

On September 5, 2025, Ensolum personnel were at the Site to conduct delineation activities. Four delineation soil samples, SS01 through SS04, were collected around the lined containment at a depth of 0.5 feet bgs to confirm the release remained within the lined containment walls. One borehole, BH01, was advanced via hand auger to a terminal depth of 2 feet bgs in the location of the tear identified during the liner inspection. Discrete delineation soil samples were collected from the borehole at depths ranging from 0.5 feet to 2 feet bgs. The delineation soil samples were field screened for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID) and chloride utilizing Hach® chloride QuanTab® test strips. Field screening results and observations of the soil samples collected from the borehole were logged on a lithologic/soil sampling log, which is included in Appendix B. The delineation soil sample locations were mapped utilizing a handheld Global Positioning System (GPS) unit and are depicted on Figure 2. Following delineation activities, the liner was patched in the area of where BH01 was advanced. Photographic documentation is included in Appendix C.

The soil samples were placed directly into pre-cleaned glass jars, labeled with the Site location, date, time, sampler name, method of analysis, and immediately placed on ice. The soil samples were transported under strict chain-of-custody procedures to Cardinal Laboratories (Cardinal) in Hobbs, New Mexico, for analysis of the following contaminants of concern (COCs): BTEX following United States

XTO Energy, Inc
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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 Method SM4500.

LABORATORY ANALYTICAL RESULTS

Delineation soil samples, SS01 through SS04, indicated all COCs were in compliance with Closure Criteria, successfully defining the lateral extent of the release. Laboratory analytical results for delineation soil sample BH01, collected at a depth of 0.5 feet bgs, indicated TPH concentrations exceeded Closure Criteria. Laboratory analytical results for BH01A, collected from a depth of 2 feet bgs, indicated all COCs were in compliance with Closure Criteria, successfully defining the vertical extent of the release. Laboratory analytical results are summarized in Table 1 and the laboratory analytical reports are included in Appendix D.

DEFERRAL REQUEST

XTO is requesting deferral of final remediation due to the presence of active production equipment located within a lined containment. The impacted soil is limited to the area directly below the lined containment, where remediation would require a major facility deconstruction. The impacted soil remaining in place is delineated vertically by delineation soil sample BH01A, collected at 2 feet bgs. Analytical results for delineation soil samples SS01 through SS04 collected outside the lined containment indicated COC concentrations were below Closure Criteria, confirming lateral definition of the release. A maximum of 476 cubic yards of TPH impacted soil remains in place below the 6,430 square-foot containment area.

XTO does not believe deferment will result in imminent risk to human health, the environment, or groundwater. Depth to groundwater was determined to be greater than 100 feet bgs and the impacted soil remaining in place is limited in areal and vertical extent.

Based on the presence of active production equipment located within the lined containment and the complete lateral and vertical delineation of impacted soil remaining in place, XTO requests deferral of final remediation for Incident Number nAPP2516632826 until final reclamation of the well pad or major construction, whichever comes first.

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

Sincerely,
Ensolum, LLC



Kim Thomason
Senior Technician



Benjamin J. Belill
Senior Geologist

Cc: Colton Brown, XTO
Kaylan Dirkx, XTO
BLM



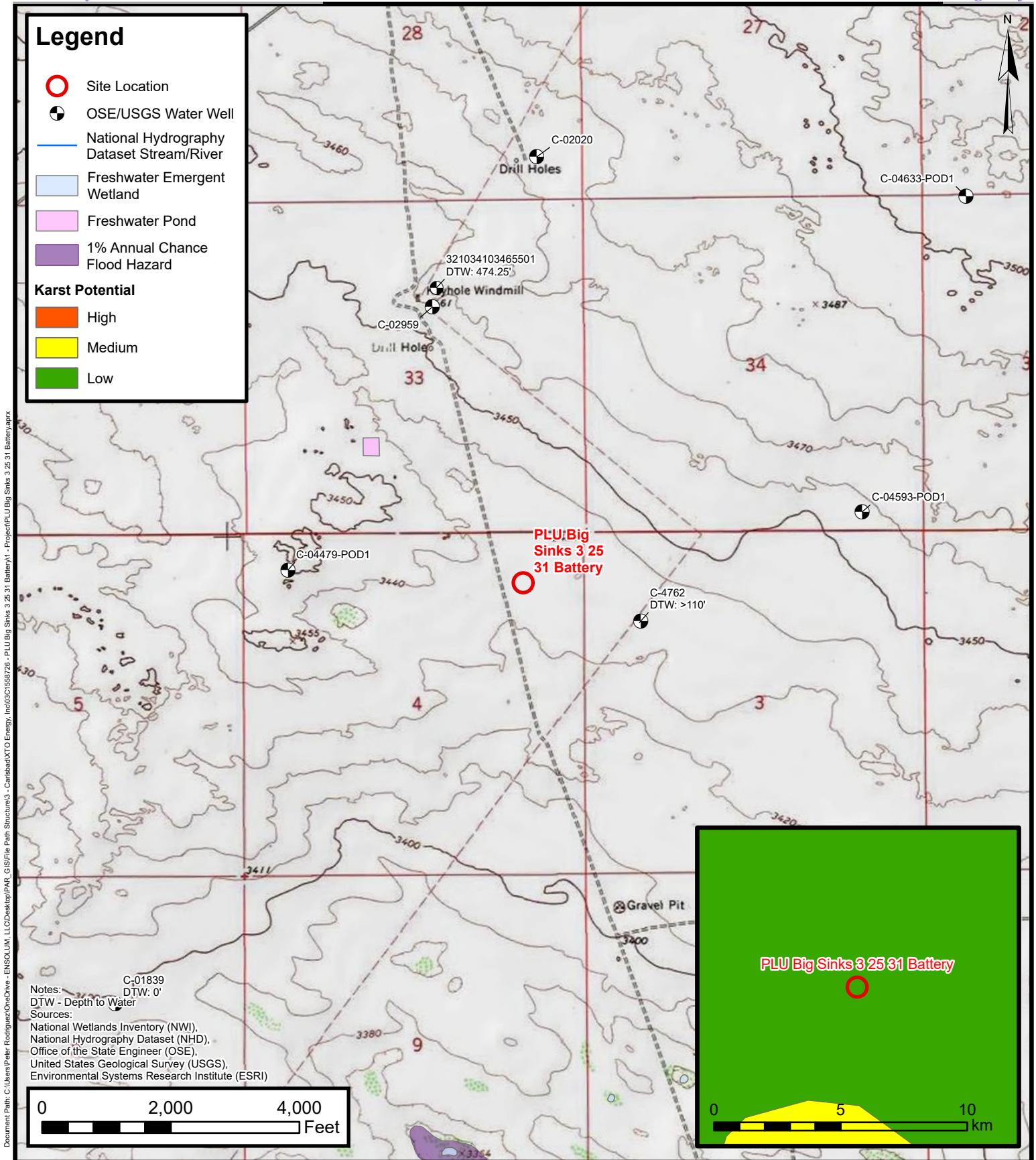
XTO Energy, Inc
Deferral Request
PLU Big Sinks 03 25 31 Battery

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	Lithologic / Soil Sampling Log
Appendix C	Photographic Log
Appendix D	Laboratory Analytical Reports & Chain-of-Custody Documentation



FIGURES



Site Receptor Map

XTO Energy, Inc

PLU Big Sinks 3 25 31 Battery

Incident Number: nAPP2516632826

Unit I, Sec 4, T 25S, R 31E

Eddy County, New Mexico

FIGURE

1



Legend

- Delineation Soil Sample
Compliant with Closure Criteria
- Delineation Soil Sample with
Some Concentrations Exceeding
Site Closure Criteria
- Lined Containment Area



Note:
Sample ID @ Depth Below Ground Surface
Concentrations in **bold** exceed the NMOCDC Table I Closure Criteria
or reclamation requirement where applicable.

0 50 100
Feet

Sources
Azure Maps



Delineation Soil Sample Locations

XTO Energy, Inc
PLU Big Sinks 3 25 31 Battery
Incident Number: nAPP2516632826
Unit I, Sec 4, T 25S, R 31E
Eddy County, New Mexico

FIGURE

2



TABLES



TABLE 1
SOIL SAMPLE ANALYTICAL RESULTS
PLU Big Sinks 03-25-31 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	1,000	2,500	20,000
Delineation Soil Samples										
SS01	09/05/2025	0.5	<0.050	<0.300	<10.0	44.2	<10.0	44.2	44.2	16.0
SS02	09/05/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	80.0
SS03	09/05/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	144
SS04	09/05/2025	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	32.0
BH01	09/05/2025	0.5	<0.100	21.8	979	4,330	545	5,309	5,854	7,200
BH01A	09/05/2025	2	<0.050	<0.300	<10.0	93.6	<10.0	93.6	93.6	272

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



WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

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-4762			
	WELL OWNER NAME(S) XTO Energy, Inc.				PHONE (OPTIONAL)			
	WELL OWNER MAILING ADDRESS 3401 E, Greene Street				CITY Carlsbad	STATE NM	ZIP 88220	
	WELL LOCATION (FROM GPS)	DEGREES 32	MINUTES 9	SECONDS 46.76	N	* ACCURACY REQUIRED: ONE TENTH OF A SECOND		
		LONGITUDE -103	46	18.78	W	* DATUM REQUIRED: WGS 84		
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS – PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE Unit F, Section 3, Township 25 South, Range 31 East								
2. DRILLING & CASING INFORMATION	LICENSE NO. WD-1188		NAME OF LICENSED DRILLER Scott Scarborough			NAME OF WELL DRILLING COMPANY Scarborough Drilling Inc.		
	DRILLING STARTED 8/9/2023		DRILLING ENDED 8/9/2023		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	TO						
	0	75	6	Temporary SCH 40 PVC	-	2	-	-
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 04/30/19)

FILE NO.

POD NO.

TRN NO.


LOCATION

WELL TAG ID NO.

PAGE 1 OF 2

4. HYDROGEOLOGIC LOG OF WELL	DEPTH (feet bgl)		THICKNESS (feet)	COLOR AND TYPE OF MATERIAL ENCOUNTERED - INCLUDE WATER-BEARING CAVITIES OR FRACTURE ZONES (attach supplemental sheets to fully describe all units)	WATER BEARING? (YES / NO)	ESTIMATED YIELD FOR WATER- BEARING ZONES (gpm)
	FROM	TO				
	0	20	20	Tan Caliche	Y ✓ N	
	20	30	10	Red-Brown Sand	Y ✓ N	
	30	110	80	Red-Orange Sand	Y ✓ N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
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					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 casing removed and soil bore was backfilled using drill cuttings to a depth of 10 feet below ground surface, remaining 10 feet backfilled using hydrated bentonite chips.	
	PRINT NAME(S) OF DRILL RIG SUPERVISOR(S) THAT PROVIDED ONSITE SUPERVISION OF WELL CONSTRUCTION OTHER THAN LICENSEE: Mariaha O'Dell, Sarah Welvang	

6. SIGNATURE	BY SIGNING BELOW, I CERTIFY THAT TO THE BEST OF MY KNOWLEDGE AND BELIEF, THE FOREGOING IS A TRUE AND CORRECT RECORD OF THE ABOVE DESCRIBED WELL. I ALSO CERTIFY THAT THE WELL TAG, IF REQUIRED, HAS BEEN INSTALLED AND THAT THIS WELL RECORD WILL ALSO BE FILED WITH THE PERMIT HOLDER WITHIN 30 DAYS AFTER THE COMPLETION OF WELL DRILLING.	
	 _____ SIGNATURE OF DRILLER / PRINT SIGNEE NAME	2/25/2025 _____ DATE

FOR OSE INTERNAL USE


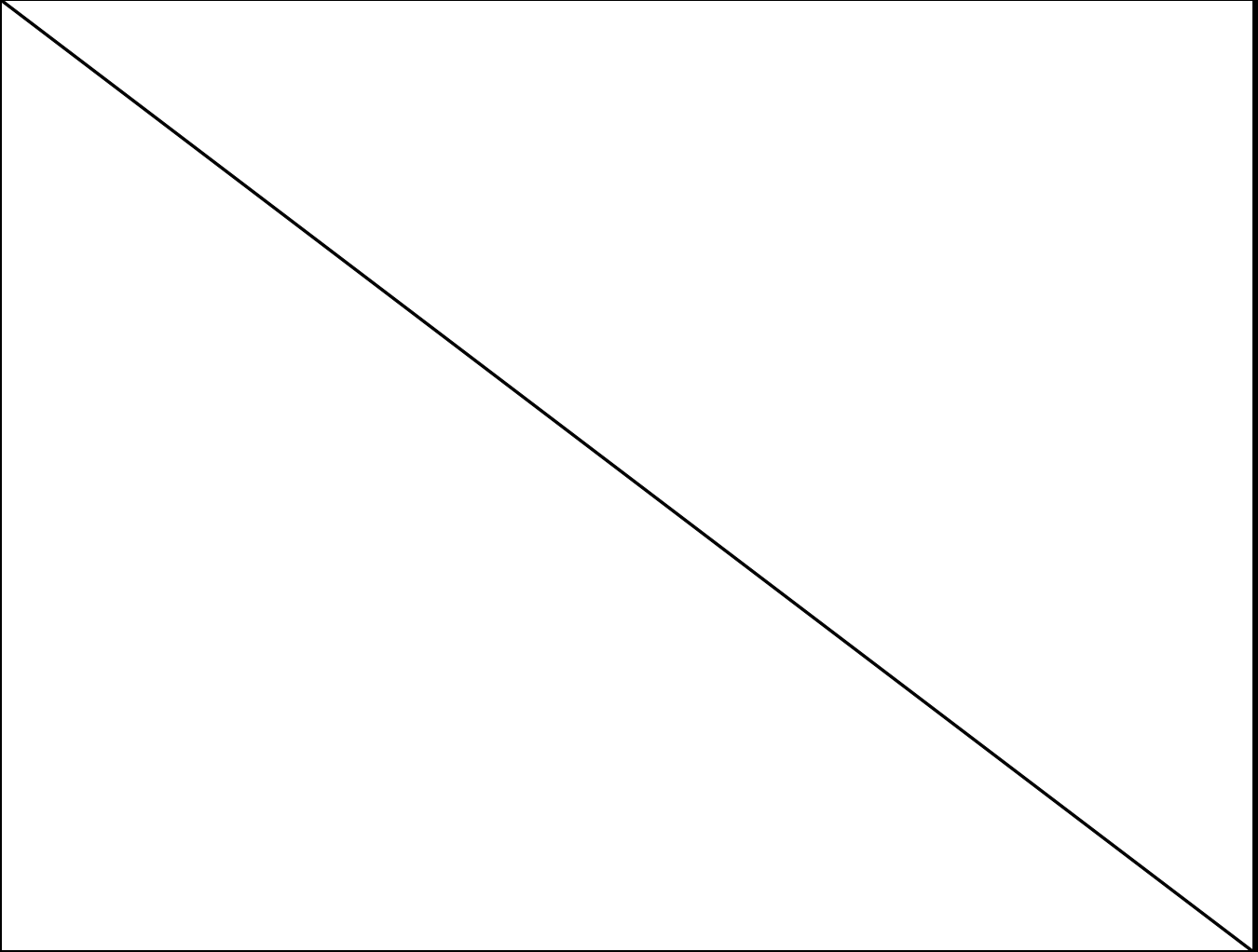
WR-20 WELL RECORD & LOG (Version 04/30/2019)

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



APPENDIX B

Lithologic Soil Sampling Logs

								Sample Name: BH01		Date: 9/5/2025	
								Site Name: PLU Big Sinks 3 25 31 Battery			
								Incident Number: nAPP2516632826			
								Job Number: 03C1558762			
LITHOLOGIC / SOIL SAMPLING LOG								Logged By: CFW		Method: Hand Auger	
Coordinates: 32.164582, -103.777116								Hole Diameter: 3.5 in		Total Depth: 2 feet	
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	3,343	610	N	BH01	0.5	0	SW	(0-1') SAND, light brown, fine to med, little gravel, odor, well graded			
Dry	10,052	78.4	N		1	1	SP	(1-2') SAND, red to dark brown, fine, poor graded			
Dry	5,309	78.0	N	BH01A	2	2	SW	(2') SAND, red, coarse to fine, well graded			
Total Depth @ 2 feet bgs											
											



APPENDIX C

Photographic Log



Photographic Log

XTO Energy, Inc
PLU Big Sinks 3 25 31 Battery
nAPP2516632826

Date & Time: Tue, Aug 26, 2025 at 10:06:08 MDT
Position: 032.164575° N / 103.777126° W (-2.7m)
Altitude: 3562ft (+19.6m)
Datum: WGS-84
Azimuth/Bearing: 095° S/E 1456mils True (+11°)
Elevation Angle: -23.0°
Horizon Angle: +00.0°
Zoom: 1.0X



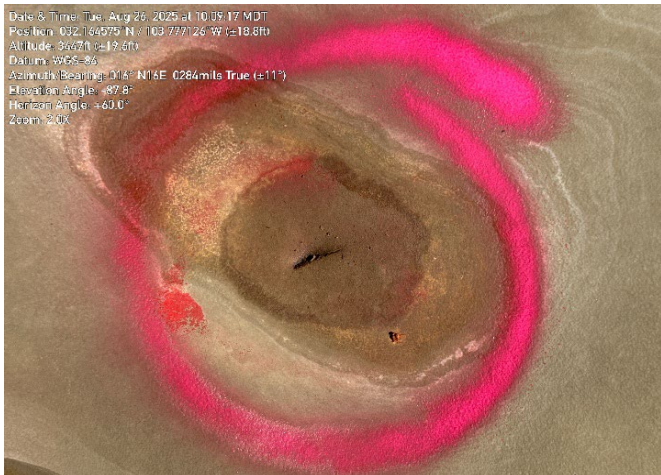
Photograph: 1 Date: 8/26/2025
Description: Liner inspection activities
View: East

Date & Time: Tue, Aug 26, 2025 at 10:07:08 MDT
Position: 032.164575° N / 103.777126° W (-2.7m)
Altitude: 3562ft (+19.6m)
Datum: WGS-84
Azimuth/Bearing: 221° S/W 3924mils True (+11°)
Elevation Angle: -23.0°
Horizon Angle: +02.5°
Zoom: 1.0X



Photograph: 2 Date: 8/26/2025
Description: Liner inspection activities
View: South

Date & Time: Tue, Aug 26, 2025 at 10:09:17 MDT
Position: 032.164575° N / 103.777126° W (-2.7m)
Altitude: 3562ft (+19.6m)
Datum: WGS-84
Azimuth/Bearing: 014° N/E 6284mils True (+11°)
Elevation Angle: -87.6°
Horizon Angle: +60.0°
Zoom: 2.0X



Photograph: 3 Date: 8/26/2025
Description: Liner inspection; tear in liner
View: Direct

Date & Time: Fri, Sep 05, 2025 at 11:12:33 MDT
Position: 032.164575° N / 103.777120° W (-2.7m)
Altitude: 3560m (+19.0m)
Datum: WGS-84
Azimuth/Bearing: 358° N/W 6364mils True (+12°)
Elevation Angle: -29.7°
Horizon Angle: +05.7°
Zoom: 1.0X



Photograph: 4 Date: 9/5/2025
Description: Delineation activities; near BH01
View: Direct

**Photographic Log**

XTO Energy, Inc
 PLU Big Sinks 3 25 31 Battery
 nAPP2516632826



Photograph: 5 Date: 9/5/2025
 Description: Patching of tear; near BH01
 View: Direct



Photograph: 6 Date: 9/5/2025
 Description: Delineation activities; near SS01
 View: North



Photograph: 7 Date: 9/5/2025
 Description: Delineation activities; near SS02
 View: West



Photograph: 8 Date: 9/5/2025
 Description: Delineation activities; near SS04
 View: East



APPENDIX D

Laboratory Analytical Reports & Chain of Custody Documentation



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

September 10, 2025

TRACY HILLARD

ENSOLUM

3122 NATIONAL PARKS HWY

CARLSBAD, NM 88220

RE: PLU BIG SINKS 3-25-31

Enclosed are the results of analyses for samples received by the laboratory on 09/08/25 12:45.

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.

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' at the beginning.

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

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

Received: 09/08/2025
Reported: 09/10/2025
Project Name: PLU BIG SINKS 3-25-31
Project Number: 03C1558726
Project Location: XTO 32.16463, -103.77721

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: BH 01 0.5 (H255580-01)

BTEx 8021B		mg/kg	Analyzed By: JH					S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.100	0.100	09/09/2025	ND	1.85	92.6	2.00	1.75	
Toluene*	<0.100	0.100	09/09/2025	ND	1.90	94.8	2.00	1.79	GC-NC
Ethylbenzene*	2.33	0.100	09/09/2025	ND	1.87	93.6	2.00	1.73	GC-NC1
Total Xylenes*	19.5	0.300	09/09/2025	ND	5.52	92.0	6.00	1.79	
Total BTEx	21.8	0.600	09/09/2025	ND					GC-NC1

Surrogate: 4-Bromofluorobenzene (PID) 216 % 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	7200	16.0	09/09/2025	ND	416	104	400	3.77	

TPH 8015M		mg/kg	Analyzed By: MS					S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	979	10.0	09/09/2025	ND	176	88.2	200	2.91	
DRO >C10-C28*	4330	10.0	09/09/2025	ND	161	80.7	200	1.97	
EXT DRO >C28-C36	545	10.0	09/09/2025	ND					

Surrogate: 1-Chlorooctane 291 % 44.4-145

Surrogate: 1-Chlorooctadecane 220 % 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
TRACY HILLARD
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220
Fax To:

Received: 09/08/2025
Reported: 09/10/2025
Project Name: PLU BIG SINKS 3-25-31
Project Number: 03C1558726
Project Location: XTO 32.16463, -103.77721

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: BH 01A 2 (H255580-02)

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	09/09/2025	ND	1.85	92.6	2.00	1.75		
Toluene*	<0.050	0.050	09/09/2025	ND	1.90	94.8	2.00	1.79		
Ethylbenzene*	<0.050	0.050	09/09/2025	ND	1.87	93.6	2.00	1.73		
Total Xylenes*	0.246	0.150	09/09/2025	ND	5.52	92.0	6.00	1.79		
Total BTEX	<0.300	0.300	09/09/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 95.7 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	272	16.0	09/09/2025	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/09/2025	ND	176	88.2	200	2.91	
DRO >C10-C28*	93.6	10.0	09/09/2025	ND	161	80.7	200	1.97	
EXT DRO >C28-C36	<10.0	10.0	09/09/2025	ND					

Surrogate: 1-Chlorooctane 82.7 % 44.4-145

Surrogate: 1-Chlorooctadecane 85.3 % 40.6-153

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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

Notes and Definitions

S-04	The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
GC-NC1	8260 confirmation analysis was performed; initial GC results were not supported by GC/MS analysis and are biased high with interfering compounds.
GC-NC	8260 confirmation analysis was performed; initial GC results were not supported by GC/MS analysis and are reported as ND.
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



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name: Ensolum, LLC		BILL TO		ANALYSIS REQUEST	
Project Manager: Tracy Hilda		P.O. #:			
Address: 3122 National Parks Hwy		Company: XTO Energy, Inc			
City: Carlsbad		Attn: Dalton Brown			
State: NM Zip: 88220		Address: 3104 E. QUEEN ST			
Phone #: 575.937.3906 Fax #:		City: Carlsbad			
Project #: 0301558726		State: NM Zip: 88220			
Project Name: PLU Bldg Sinks 3-25-31		Phone #:			
Project Location: 32.16463, -103.77721		Fax #:			
Sampler Name: Chris McHART					

Lab I.D.	Sample I.D.	Sample Depth (feet)	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						DATE	TIME	BTEX	TPH	CHLORIDE
					GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :					
H255580	BH01	0.5		1			✓				9/5/25	1120	✓	✓	✓
	BH01A	2		1			✓				9/5/25	1210	✓	✓	✓

Relinquished By: <i>CM</i>		Received By: <i>Tracy Hilda</i>	
Date: 9-8-25	Time: 1:34 PM	Date:	Time:
Delivered By: (Circle One)		Observed Temp. °C: 0.2	
Sampler - UPS - Bus - Other:		Corrected Temp. °C: 0.5	
Sample Condition: <input checked="" type="checkbox"/> Intact <input type="checkbox"/> Cool <input type="checkbox"/> No		CHECKED BY: <i>Tracy Hilda</i>	
Turnaround Time: Standard <input checked="" type="checkbox"/> Rush <input type="checkbox"/>		Thermometer ID: #13	
Correction Factor: -0.5°C		Bacteria (only) <input type="checkbox"/> Sample Condition <input type="checkbox"/>	
		Cool Intact <input type="checkbox"/> Observed Temp. °C	
		Corrected Temp. °C	

REMARKS: All Results are emailed. Please provide Email address: *tracy.hilda@ensolum.com*

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

Cost Level: 1081021001

GPEN: 48605000-5PUS

Notes: nH2516632826

Cardinal Laboratories



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

September 10, 2025

TRACY HILLARD

ENSOLUM

3122 NATIONAL PARKS HWY

CARLSBAD, NM 88220

RE: PLU BIG SINKS 3-25-31

Enclosed are the results of analyses for samples received by the laboratory on 09/08/25 12:45.

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.

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

Received: 09/08/2025
Reported: 09/10/2025
Project Name: PLU BIG SINKS 3-25-31
Project Number: 03C1558726
Project Location: XTO 32.16463, -103.77721

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: SS 01 0.5 (H255582-01)

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	09/09/2025	ND	1.85	92.6	2.00	1.75	
Toluene*	<0.050	0.050	09/09/2025	ND	1.90	94.8	2.00	1.79	
Ethylbenzene*	<0.050	0.050	09/09/2025	ND	1.87	93.6	2.00	1.73	
Total Xylenes*	<0.150	0.150	09/09/2025	ND	5.52	92.0	6.00	1.79	
Total BTX	<0.300	0.300	09/09/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 90.9 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	16.0	16.0	09/09/2025	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/09/2025	ND	176	88.2	200	2.91	
DRO >C10-C28*	44.2	10.0	09/09/2025	ND	161	80.7	200	1.97	
EXT DRO >C28-C36	<10.0	10.0	09/09/2025	ND					

Surrogate: 1-Chlorooctane 85.4 % 44.4-145

Surrogate: 1-Chlorooctadecane 88.7 % 40.6-153

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

Received: 09/08/2025
Reported: 09/10/2025
Project Name: PLU BIG SINKS 3-25-31
Project Number: 03C1558726
Project Location: XTO 32.16463, -103.77721

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: SS 02 0.5 (H255582-02)

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	09/09/2025	ND	1.85	92.6	2.00	1.75		
Toluene*	<0.050	0.050	09/09/2025	ND	1.90	94.8	2.00	1.79		
Ethylbenzene*	<0.050	0.050	09/09/2025	ND	1.87	93.6	2.00	1.73		
Total Xylenes*	<0.150	0.150	09/09/2025	ND	5.52	92.0	6.00	1.79		
Total BTX	<0.300	0.300	09/09/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 89.9 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	09/09/2025	ND	416	104	400	3.77	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/09/2025	ND	176	88.2	200	2.91	
DRO >C10-C28*	<10.0	10.0	09/09/2025	ND	161	80.7	200	1.97	
EXT DRO >C28-C36	<10.0	10.0	09/09/2025	ND					

Surrogate: 1-Chlorooctane 78.1 % 44.4-145

Surrogate: 1-Chlorooctadecane 78.6 % 40.6-153

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

Received: 09/08/2025
Reported: 09/10/2025
Project Name: PLU BIG SINKS 3-25-31
Project Number: 03C1558726
Project Location: XTO 32.16463, -103.77721

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: SS 03 0.5 (H255582-03)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/09/2025	ND	1.85	92.6	2.00	1.75		
Toluene*	<0.050	0.050	09/09/2025	ND	1.90	94.8	2.00	1.79		
Ethylbenzene*	<0.050	0.050	09/09/2025	ND	1.87	93.6	2.00	1.73		
Total Xylenes*	<0.150	0.150	09/09/2025	ND	5.52	92.0	6.00	1.79		
Total BTEX	<0.300	0.300	09/09/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 90.7 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	144	16.0	09/09/2025	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/09/2025	ND	176	88.2	200	2.91	
DRO >C10-C28*	<10.0	10.0	09/09/2025	ND	161	80.7	200	1.97	
EXT DRO >C28-C36	<10.0	10.0	09/09/2025	ND					

Surrogate: 1-Chlorooctane 77.2 % 44.4-145

Surrogate: 1-Chlorooctadecane 77.2 % 40.6-153

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Analytical Results For:

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

Received: 09/08/2025
Reported: 09/10/2025
Project Name: PLU BIG SINKS 3-25-31
Project Number: 03C1558726
Project Location: XTO 32.16463, -103.77721

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: SS 04 0.5 (H255582-04)

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	09/09/2025	ND	1.85	92.6	2.00	1.75		
Toluene*	<0.050	0.050	09/09/2025	ND	1.90	94.8	2.00	1.79		
Ethylbenzene*	<0.050	0.050	09/09/2025	ND	1.87	93.6	2.00	1.73		
Total Xylenes*	<0.150	0.150	09/09/2025	ND	5.52	92.0	6.00	1.79		
Total BTX	<0.300	0.300	09/09/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 90.1 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	09/09/2025	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/09/2025	ND	176	88.2	200	2.91	
DRO >C10-C28*	<10.0	10.0	09/09/2025	ND	161	80.7	200	1.97	
EXT DRO >C28-C36	<10.0	10.0	09/09/2025	ND					

Surrogate: 1-Chlorooctane 85.7 % 44.4-145

Surrogate: 1-Chlorooctadecane 85.8 % 40.6-153

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Celey D. Keene, Lab Director/Quality Manager

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

Notes and Definitions

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

Cardinal Laboratories

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

Celey D. Keene, Lab Director/Quality Manager

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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: Ensolum, LLC

Project Manager: Tracy Hillard

Address: 3122 National Parks Hwy

City: Carlsbad

Phone #: 575.937.3906

Project #: 0301558726

Project Name: Fluoride Sinks 3-25-31

Project Location: 32.16463, -103.77721

Sampler Name: Chris Wright

FOR LAB USE ONLY

P.O. #:

Company: XTO Energy, Inc

Attn: Lotion Brown

Address: 3104 E Green St

City: Carlsbad

State: NIM

Zip: 88220

Phone #:

Fax #:

State: NIM

Zip: 88220

City: Carlsbad

Project Owner: XTO Energy, Inc

State: NIM

Zip: 88220

City: Carlsbad

Project Name: Fluoride Sinks 3-25-31

Project Location: 32.16463, -103.77721

Sampler Name: Chris Wright

Lab I.D.	Sample I.D.	Sample Depth (feet)	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						DATE	TIME	PRESERV			SAMPLING		
					GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :			ACID/BASE:	ICE / COOL	OTHER :	BTEX	TPH	CHLORIDE
455582	5501	6.5	1	1	✓						9/5/25	1350	✓	✓	✓			
	5502	6.5	1	1	✓						9/5/25	1355	✓	✓	✓			
	5503	6.5	1	1	✓						9/5/25	1402	✓	✓	✓			
	5504	6.5	1	1	✓						9/5/25	1438	✓	✓	✓			

Relinquished By: [Signature]

Relinquished Date: 9-8-25

Received By: [Signature]

Received Date: 9-8-25

Remarks:

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

All Results are emailed. Please provide Email address:

Turnaround Time: 48 hrs **Standard** ☐ **Rush** ☒

Thermometer ID: #13 **Correction Factor:** -0.3°C

Bacteria (only) Sample Condition: ☐ Cool ☐ Intact ☐ Yes ☐ No **Observed Temp. °C:**

Corrected Temp. °C:

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 505724

QUESTIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 505724
	Action Type: [C-141] Deferral Request C-141 (C-141-v-Deferral)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2516632826
Incident Name	NAPP2516632826 PLU BIG SINKS 3 25 31 BATTERY @ I-04-25S-31E
Incident Type	Produced Water Release
Incident Status	Deferral Request Received

Location of Release Source	
Please answer all the questions in this group.	
Site Name	PLU BIG SINKS 3 25 31 BATTERY
Date Release Discovered	06/14/2025
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: Equipment Failure Pump Produced Water Released: 30 BBL Recovered: 30 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)	pump seal failed

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

General Information
Phone: (505) 629-6116

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

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

QUESTIONS, Page 2

Action 505724

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 505724
	Action Type: [C-141] Deferral Request C-141 (C-141-v-Deferral)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	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: Robert Woodall Title: Environmental Analyst Email: robert.d.woodall@exxonmobil.com Date: 09/12/2025
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Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS, Page 3

Action 505724

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:
	5380
	Action Number: 505724
	Action Type: [C-141] Deferral Request C-141 (C-141-v-Deferral)

QUESTIONS

Site Characterization	
<i>Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 1 and 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between ½ and 1 (mi.)
Any other fresh water well or spring	Between ½ and 1 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1 and 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Between 1 and 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Between 1 and 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No
Soil Contamination Sampling: (Provide the highest observable value for each, in milligrams per kilograms.)	
Chloride (EPA 300.0 or SM4500 Cl B)	7200
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	5854
GRO+DRO (EPA SW-846 Method 8015M)	5309
BTEX (EPA SW-846 Method 8021B or 8260B)	21.8
Benzene (EPA SW-846 Method 8021B or 8260B)	0
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	08/26/2025
On what date will (or did) the final sampling or liner inspection occur	09/05/2025
On what date will (or was) the remediation complete(d)	09/05/2025
What is the estimated surface area (in square feet) that will be reclaimed	6430
What is the estimated volume (in cubic yards) that will be reclaimed	476
What is the estimated surface area (in square feet) that will be remediated	6430
What is the estimated volume (in cubic yards) that will be remediated	476
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 4

Action 505724

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 505724
	Action Type: [C-141] Deferral Request C-141 (C-141-v-Deferral)

QUESTIONS

Remediation Plan (continued)	
<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>	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
<i>(Select all answers below that apply.)</i>	
(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc.)	No
(Ex Situ) Excavation and on-site 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)	Yes
Other Non-listed Remedial Process. Please specify	No impacts removed
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
I hereby agree and sign off to the above statement	Name: Robert Woodall Title: Environmental Analyst Email: robert.d.woodall@exxonmobil.com Date: 09/12/2025
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 5

Action 505724

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 505724
	Action Type: [C-141] Deferral Request C-141 (C-141-v-Deferral)

QUESTIONS

Deferral Requests Only	
<i>Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.</i>	
Requesting a deferral of the remediation closure due date with the approval of this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Is the remaining contamination in areas immediately under or around production equipment where remediation could cause a major facility deconstruction	Yes
Please list or describe the production equipment and how (re)moving the equipment would cause major facility deconstruction	Lined containment, production tanks, pipelines
What is the remaining surface area (in square feet) that will still need to be remediated if a deferral is granted	6430
What is the remaining volume (in cubic yards) that will still need to be remediated if a deferral is granted	476
<i>Per Paragraph (2) of Subsection C of 19.15.29.12 NMAC if contamination is located in areas immediately under or around production equipment such as production tanks, wellheads and pipelines where remediation could cause a major facility deconstruction, the remediation, restoration and reclamation may be deferred with division written approval until the equipment is removed during other operations, or when the well or facility is plugged or abandoned, whichever comes first.</i>	
Enter the facility ID (f#) on which this deferral should be granted	fAPP2126356522 PLU BIG SINKS 3 25 31 BATT
Enter the well API (30-) on which this deferral should be granted	Not answered.
Contamination does not cause an imminent risk to human health, the environment, or groundwater	True
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
I hereby agree and sign off to the above statement	Name: Robert Woodall Title: Environmental Analyst Email: robert.d.woodall@exxonmobil.com Date: 09/12/2025

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QUESTIONS, Page 6

Action 505724

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 505724
	Action Type: [C-141] Deferral Request C-141 (C-141-v-Deferral)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	499871
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	09/05/2025
What was the (estimated) number of samples that were to be gathered	20
What was the sampling surface area in square feet	4000

Remediation Closure Request

Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.

Requesting a remediation closure approval with this submission	No
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CONDITIONS

Action 505724

CONDITIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 505724
	Action Type: [C-141] Deferral Request C-141 (C-141-v-Deferral)

CONDITIONS

Created By	Condition	Condition Date
michael.buchanan	Deferral approved. Deferral underneath lined containment and BH-01 is approved until plugging and abandonment or a major facility deconstruction, whichever comes first. A complete and accurate remediation report and/or reclamation report must be submitted at that time.	9/23/2025