



October 14, 2025

New Mexico Oil Conservation Division

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

**Re: Closure Request
PLU Big Sinks 19-24-31 USA Battery
Incident Numbers nAPP2430551104 & nAPP2434134681
Eddy County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of XTO Energy, Inc (XTO), has prepared this *Closure Request* to document the findings of a liner integrity inspection conducted at the PLU Big Sinks 19-24-31 USA Battery (Site) following two releases of produced water within a lined containment. Based on the liner integrity inspection activities and laboratory analytical results, XTO is submitting this *Closure Request*, describing the inspection results and requesting closure for Incident Numbers nAPP2430551104 and nAPP2434134681.

SITE DESCRIPTION AND RELEASE SUMMARY

The release location was initially reported to the NMOCD in Unit C of Section 19, Township 24 South, Range 31 East, but after review of release location coordinates and photographs provided by XTO, it was confirmed that the release occurred in both Unit C, section 19 and Unit N, section 18, Township 24 South, Range 31 East in Eddy County, New Mexico (32.31004°, -103.81949°), and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM).

On October 31, 2024, failure of a pump resulted in the release of approximately 70 barrels (bbls) of produced water onto 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 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) and submitted an Initial C-141 Application (C-141) on October 31, 2024. The release was assigned Incident Number nAPP2430551104.

On December 5, 2024, seal failure of a pump resulted in a release of approximately 5 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 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) and submitted an Initial C-141 Application (C-141) on December 6, 2024. The release was assigned Incident Number nAPP2434134681.

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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 (NMOSE) permitted well (C-4759), located approximately 0.14 miles southeast of the Site. The soil boring was advanced on August 11, 2023, to a total depth of 110 feet bgs. The well was properly plugged and abandoned using hydrated bentonite chips and drill cuttings. All wells used for depth to groundwater determination are presented on Figure 1. The Well Record and Log for C-4759 is included in Appendix A.

The closest continuously flowing or significant watercourse to the Site is a riverine located approximately 6,343 feet northeast 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): 2,500 mg/kg
- Chloride: 20,000 mg/kg

LINER INTEGRITY INSPECTION ACTIVITIES

The lined containment was cleaned of all debris and power washed, and a liner integrity inspection was conducted by Ensolum personnel on August 19, 2025. The lined containment was inspected, and it was determined to contain a small hole. Delineation to determine the extent of the release was warranted. A site map of the lined containment is included in Figure 2. Photographic documentation of the inspection is included in Appendix B.

DELINEATION SOIL SAMPLING ACTIVITIES

On August 27, 2025, Ensolum personnel were at the Site to oversee delineation activities. Five delineation soil samples (SS01 through SS05) were collected around the lined containment from ground surface to assess the lateral extent of the release. One borehole (BH01) was advanced via hand auger to a terminal depth of 1-foot bgs in the location of the liner hole. Discrete soil samples were collected from the borehole at depths ranging from 0.5 feet bgs to 1-foot bgs. All 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 from the borehole were logged on a lithologic/soil sampling log, which is included in

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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-GRO, TPH-DRO, and TPH-oil range organics (ORO) following EPA Method 8015M/D; and chloride following Standard Method SM4500.

LABORATORY ANALYTICAL RESULTS

Laboratory analytical results for delineation soil samples SS01 through SS05 indicated all COCs were in compliance with Site Closure Criteria and reclamation standards, confirming the lateral extent of the release. Delineation soil samples from borehole BH01 at 0.5 feet bgs and 1-foot bgs indicated all COCs were in compliance with Site Closure Criteria. 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 October 2024 and December 2024 releases of produced water. Laboratory analytical results for the soil samples collected indicated that all COC concentrations were compliant with the Site Closure Criteria and/or reclamation standards where applicable. Based on the soil sample analytical results, no impacted soil was identified, and no further remediation was required. XTO patched all holes and tears in the liner following completion of delineation activities.

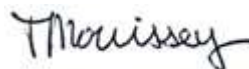
Delineation of potential impacts at this Site determined that no soil that exceeded Site Closure Criteria was located below the lined containment. Depth to groundwater has been estimated to be greater than 100 feet bgs and no other sensitive receptors were identified near the Site. XTO believes these remedial actions are protective of human health, the environment, and groundwater. As such, XTO respectfully requests closure for both Incident Numbers nAPP2430551104 and nAPP2434134681.

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



Tacoma Morrissey
Associate Principal

Cc: Robert Woodall, XTO
Richard Kotzur, XTO
BLM

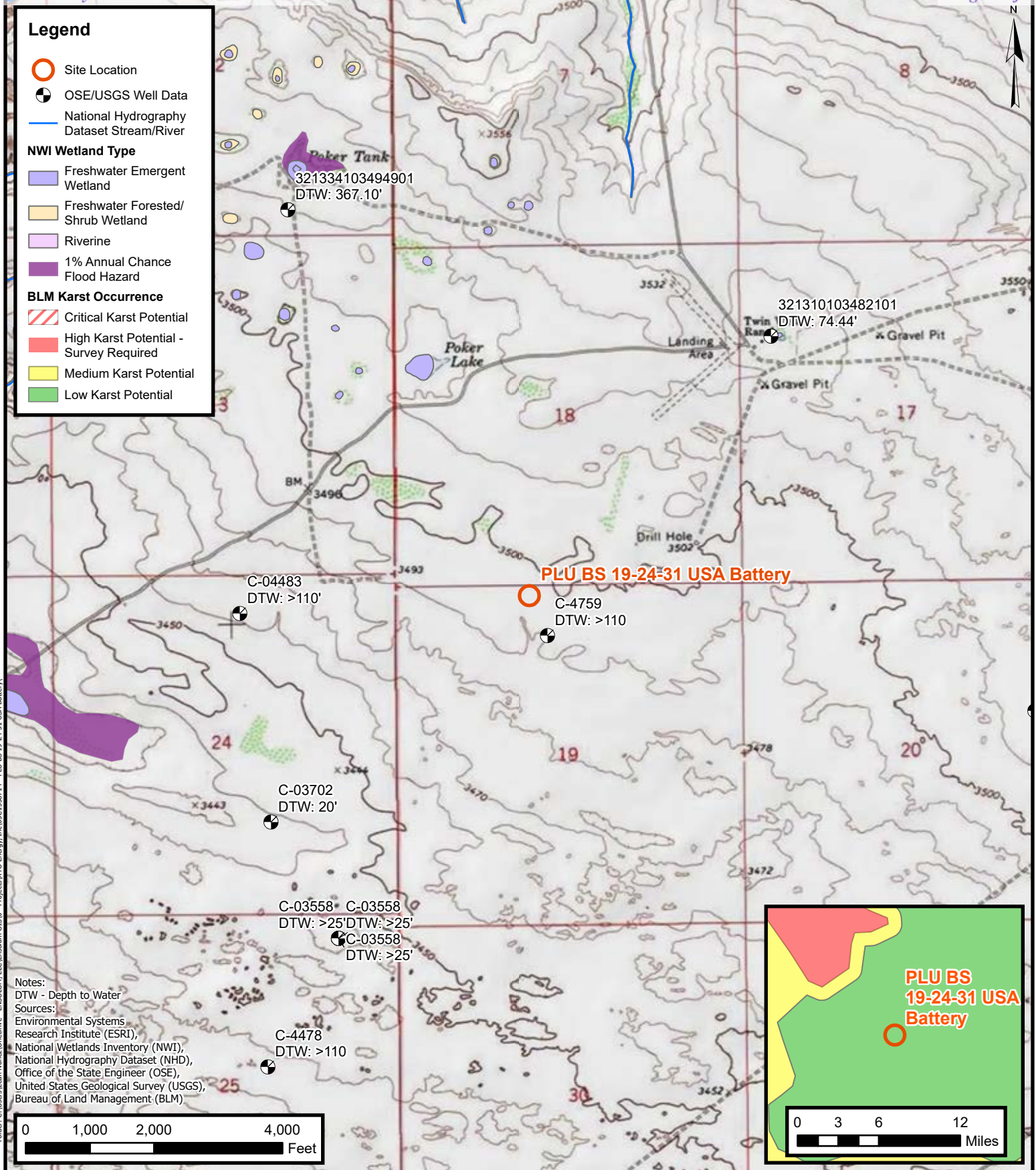
XTO Energy, Inc
Closure Request
PLU Big Sinks 19-24-31 USA Battery

Appendices:

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



FIGURES



Site Receptor Map

XTO Energy, Inc
PLU BS 19-24-31 USA Battery
Incident Numbers: nAPP2430551104 & nAPP2434134681
Unit C, Section 19/ Unit N, Section 18, T 24S, R 31E
Eddy County, New Mexico

FIGURE

1

Legend

- Delineation Soil Sample in Compliance with Closure Criteria
- Oil and Gas Utility Line
- Electric Line
- Water Utility Line
- Lined Containment



Notes:
Sample ID @ Depth Below Ground Surface.

Sources: Environmental Systems Research Institute (ESRI)



Delineation Soil Sample Locations

XTO Energy, Inc
PLU BS 19-24-31 USA Battery
Incident Numbers: nAPP2430551104 & nAPP2434134681
Unit C, Section 19/ Unit N, Section 18, T 24S, R 31E
Eddy County, New Mexico

FIGURE

2



TABLES



TABLE 1
SOIL SAMPLE ANALYTICAL RESULTS
PLU Big Sinks 19-24-31 USA Battery
XTO Energy, Inc
nAPP2430551104 & nAPP2434134681

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	08/27/25	SURFACE	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	<16.0
SS02	08/27/25	SURFACE	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	<16.0
SS03	08/27/25	SURFACE	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	32.0
SS04	08/27/25	SURFACE	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	64.0
SS05	08/27/25	SURFACE	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	<16.0
BH01	08/27/25	0.5	<0.050	<0.300	<10.0	231	151	231	382	848
BH01A	08/27/25	1	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	320

Notes:

bgs: below ground surface

mg/kg: milligrams per kilogram

NMOCD: New Mexico Oil Conservation Division

BTEX: Benzene, Toluene, Ethylbenzene, and Xylenes

Concentrations in **bold** exceed the NMOCD Table I Closure Criteria or reclamation requirement where applicable.

GRO: Gasoline Range Organics

DRO: Diesel Range Organics

ORO: Oil Range Organics

TPH: Total Petroleum Hydrocarbon

NMAC: New Mexico Administrative Code

Grey text indicates soil sample removed during excavation activities



APPENDIX A

Referenced Well Records



WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

www.ose.state.nm.us

1. GENERAL AND WELL LOCATION	OSE POD NO. (WELL NO.) Pod 1(BH01)		WELL TAG ID NO. n/a		OSE FILE NO(S) C-4759			
	WELL OWNER NAME(S) XTO Energy, Inc.				PHONE (OPTIONAL)			
	WELL OWNER MAILING ADDRESS 3401 Greene Street				CITY STATE ZIP Carlsbad NM 88220			
	WELL LOCATION (FROM GPS)	DEGREES	MINUTES	SECONDS	N	* ACCURACY REQUIRED: ONE TENTH OF A SECOND * DATUM REQUIRED: WGS 84		
		LATITUDE	32	12				28.26
	LONGITUDE	-103	49	2.70	W			
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS - PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE Unit C, Section 19, Township 24 South, Range 31 East								
2. DRILLING & CASING INFORMATION	LICENSE NO. WD-1188		NAME OF LICENSED DRILLER Scott Scarborough			NAME OF WELL DRILLING COMPANY Scarborough Drilling Inc.		
	DRILLING STARTED 8/7/2023		DRILLING ENDED 8/7/2023		DEPTH OF COMPLETED WELL (FT) Temp casing only	BORE HOLE DEPTH (FT) 110	DEPTH WATER FIRST ENCOUNTERED (FT) N/A	
	COMPLETED WELL IS: ☐ ARTESIAN ☒ DRY HOLE ☐ SHALLOW (UNCONFINED)					STATIC WATER LEVEL IN COMPLETED WELL (FT) N/A		
	DRILLING FLUID: ☒ AIR ☐ MUD ADDITIVES - SPECIFY:							
	DRILLING METHOD: ☒ ROTARY ☐ HAMMER ☐ CABLE TOOL ☐ 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	110	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						
				N/A				

FOR OSE INTERNAL USE

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

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

OSE DIT RUSWELL NW
2 APR '25 14:06

4. HYDROGEOLOGIC LOG OF WELL

FOR OSE INTERNAL USE



APPENDIX B

Photographic Log



Photographic Log

XTO Energy, Inc.

PLU Big Sinks 19-24-31 USA Battery

nAPP2430551104 & nAPP2434134681



Photograph: 1 Date: 8/19/2025
Description: Hole in Liner before cleaning activities
View: Northeast



Photograph: 2 Date: 8/19/2025
Description: Liner before cleaning and repairs
View: Northwest



Photograph: 3 Date: 8/27/2025
Description: Delineation activities near BH01
View: Northeast

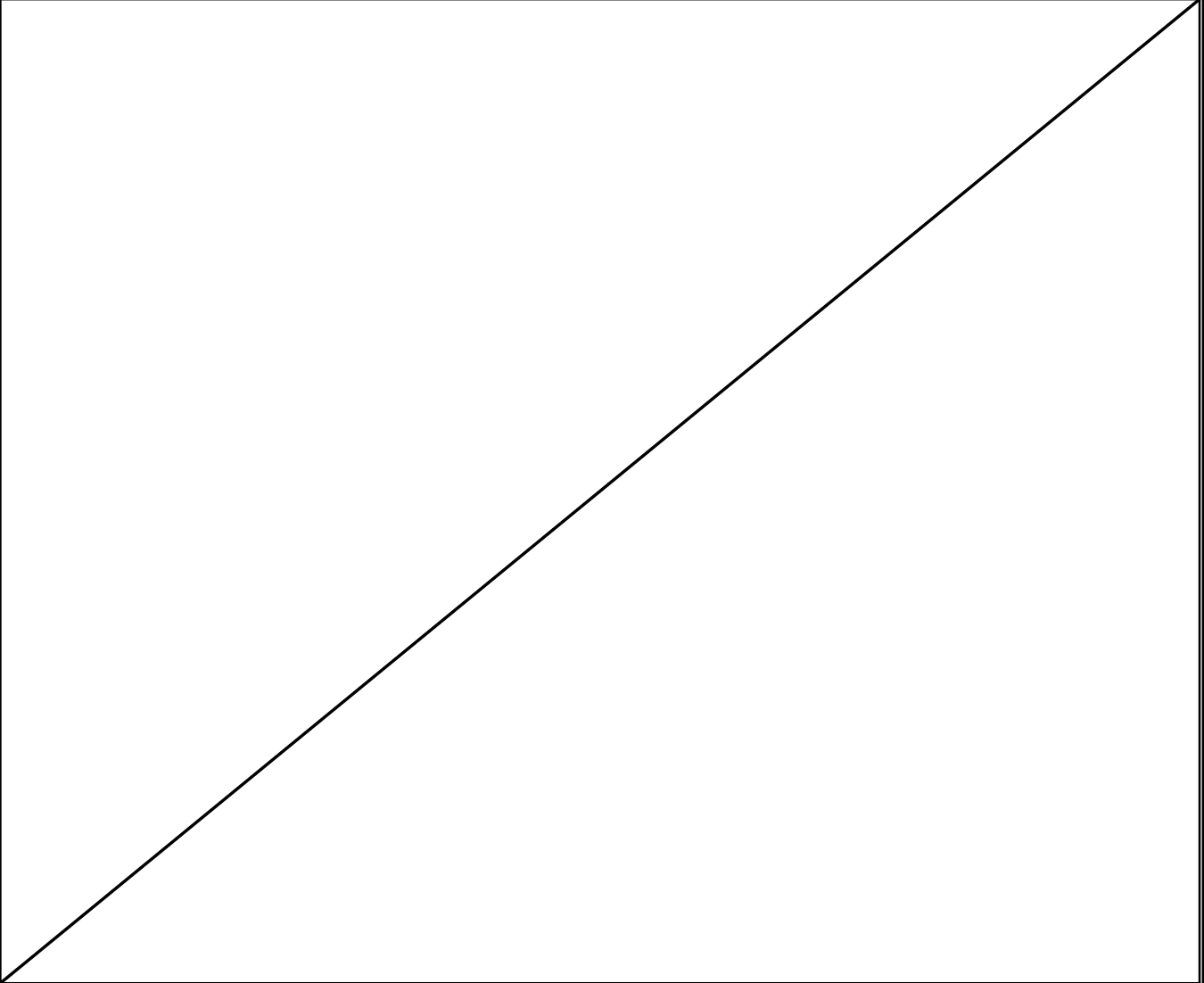


Photograph: 4 Date: 9/8/2025
Description: Liner Patch near BH01
View: West



APPENDIX C

Lithologic Soil Sampling Logs

								Sample Name: BH 01		Date: 08/27/2025	
								Site Name: PLU BS 19-24-31 USA Battery			
								Incident Number: nAPP2430551104, nAPP2434134681			
								Job Number: 03C1558728			
LITHOLOGIC / SOIL SAMPLING LOG								Logged By: Trevor Wargo		Method: Hand Auger	
Coordinates: 32.2100353, -103.8192457								Hole Diameter: 4"		Total Depth: 1'	
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. No correction factors included.											
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions			
			Y		0	0	CCHE	Caliche, pad material			
Dry	848	0.8	N	BH01	0.5		CCHE	Caliche, pad material			
Dry	320	1.2	N	BH01A	1	1	CCHE	Caliche, pad material			
Final Depth @ 1'											
											



APPENDIX D

Laboratory Analytical Reports & Chain of Custody Documentation



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

September 04, 2025

TRACY HILLARD

ENSOLUM

3122 NATIONAL PARKS HWY

CARLSBAD, NM 88220

RE: PLU BS 19 - 24 - 31 BATTERY - SPILLS

Enclosed are the results of analyses for samples received by the laboratory on 08/28/25 14:30.

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, flowing style.

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:	08/28/2025	Sampling Date:	08/27/2025
Reported:	09/04/2025	Sampling Type:	Soil
Project Name:	PLU BS 19 - 24 - 31 BATTERY - SPILLS	Sampling Condition:	Cool & Intact
Project Number:	03C1558714,03C1558728	Sample Received By:	Tamara Oldaker
Project Location:	XTO 32.210051-103.819324		

Sample ID: BH01 0.5' (H255377-01)

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	08/29/2025	ND	1.69	84.4	2.00	3.12		
Toluene*	<0.050	0.050	08/29/2025	ND	1.83	91.4	2.00	4.41		
Ethylbenzene*	<0.050	0.050	08/29/2025	ND	1.94	96.9	2.00	4.09		
Total Xylenes*	<0.150	0.150	08/29/2025	ND	6.03	101	6.00	3.83		
Total BTX	<0.300	0.300	08/29/2025	ND						

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

Chloride, SM4500Cl-B		mg/kg		Analyzed By: KH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	848	16.0	08/29/2025	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	08/29/2025	ND	183	91.5	200	0.513	
DRO >C10-C28*	231	10.0	08/29/2025	ND	182	90.9	200	0.134	
EXT DRO >C28-C36	151	10.0	08/29/2025	ND					

Surrogate: 1-Chlorooctane 107 % 44.4-145

Surrogate: 1-Chlorooctadecane 113 % 40.6-153

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

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

Received: 08/28/2025
Reported: 09/04/2025
Project Name: PLU BS 19 - 24 - 31 BATTERY - SPILLS
Project Number: 03C1558714, 03C1558728
Project Location: XTO 32.210051-103.819324

Sampling Date: 08/27/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: BH01A 1' (H255377-02)

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	08/29/2025	ND	1.69	84.4	2.00	3.12		
Toluene*	<0.050	0.050	08/29/2025	ND	1.83	91.4	2.00	4.41		
Ethylbenzene*	<0.050	0.050	08/29/2025	ND	1.94	96.9	2.00	4.09		
Total Xylenes*	<0.150	0.150	08/29/2025	ND	6.03	101	6.00	3.83		
Total BTEX	<0.300	0.300	08/29/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 111 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: KH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	320	16.0	08/29/2025	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	08/29/2025	ND	183	91.5	200	0.513	
DRO >C10-C28*	<10.0	10.0	08/29/2025	ND	182	90.9	200	0.134	
EXT DRO >C28-C36	<10.0	10.0	08/29/2025	ND					

Surrogate: 1-Chlorooctane 88.1 % 44.4-145

Surrogate: 1-Chlorooctadecane 83.1 % 40.6-153

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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

Notes and Definitions

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

*=Accredited Analyte

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A handwritten signature in black ink, appearing to read "Celey D. Keene", is written over a horizontal line.

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

1-1

Company Name: Ensolum, LLC				BILL TO				ANALYSIS REQUEST																																																																						
Project Manager: Tracy Hillard				P.O. #:				TPH 8015 BTEX 8021 Chloride 4500																																																																						
Address: 601 N Mariefeld Street, Suite 400				Company: XTO Energy, Inc																																																																										
City: Midland State: TX Zip: 79701				Attn: Colton Brown																																																																										
Phone #: (575) 937-3906 Fax #:				Address: 3104 E Greene St																																																																										
Project #: 03C1558714, 08C1558728				City: Carlsbad																																																																										
Project Name: PLU BS 19-24-31 Battery - SPILLS				State: NM Zip: 88220																																																																										
Project Location: 32.210051, -103.819324				Phone #:																																																																										
Sampler Name: Trevor Wargo				Fax #:																																																																										
<table border="1"> <thead> <tr> <th rowspan="2">Lab I.D.</th> <th rowspan="2">Sample I.D.</th> <th rowspan="2">Depth (feet)</th> <th rowspan="2">(G)RAB OR (C)OMP.</th> <th rowspan="2"># CONTAINERS</th> <th colspan="6">MATRIX</th> <th colspan="3">PRESERV.</th> <th colspan="2">SAMPLING</th> <th rowspan="2">DATE</th> <th rowspan="2">TIME</th> </tr> <tr> <th>GROUNDWATER</th> <th>WASTEWATER</th> <th>SOIL</th> <th>OIL</th> <th>SLUDGE</th> <th>OTHER</th> <th>ACID/BASE</th> <th>ICE / COOL</th> <th>OTHER</th> </tr> </thead> <tbody> <tr> <td>H255377</td> <td>BH01</td> <td>0.5</td> <td>G</td> <td>2</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>08/27/25</td> <td>12:46</td> </tr> <tr> <td>1/2</td> <td>BH01A</td> <td>1</td> <td>↓</td> <td>↓</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>↓</td> <td>13:06</td> </tr> </tbody> </table>																Lab I.D.	Sample I.D.	Depth (feet)	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						PRESERV.			SAMPLING		DATE	TIME	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER	ACID/BASE	ICE / COOL	OTHER	H255377	BH01	0.5	G	2												08/27/25	12:46	1/2	BH01A	1	↓	↓												↓	13:06
Lab I.D.	Sample I.D.	Depth (feet)	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						PRESERV.			SAMPLING							DATE	TIME																																																								
					GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER	ACID/BASE	ICE / COOL	OTHER																																																																	
H255377	BH01	0.5	G	2												08/27/25	12:46																																																													
1/2	BH01A	1	↓	↓												↓	13:06																																																													

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Relinquished By: Trevor Wargo		Date: 8-28-25	Received By: [Signature]		Verbal Result: ☐ Yes ☒ No Add'l Phone #:	
Relinquished By:		Date:	Received By:		All Results are emailed. Please provide Email address: twargo@ensolum.com	
Time: 1430					BBelill@ensolum.com, TMorrissey@ensolum.com, THillard@ensolum.com, KThomason@ensolum.com	
Time:					REMARKS: Incident Number: APP2430551104, nAPP2434134081	
Delivered By: (Circle One)		Observed Temp. °C 0.1	Sample Condition		Turnaround Time: Standard ☒ Rush ☐	
Sampler - UPS - Bus - Other:		Corrected Temp. °C 0.4	Cool Intact ☒ Yes ☐ No ☐ Yes ☐ No ☐		Thermometer ID #13 #140	
			CHECKED BY: (Initials)		Correction Factor: -0.5°C +0.3°C	
					Bacteria (only) Sample Condition	
					Cool Intact ☐ Yes ☐ No ☐	
					Observed Temp. °C	
					Corrected Temp. °C	

† Cardinal cannot accept verbal changes. Please email changes to celey.keene@cardinallabsnm.com



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

September 04, 2025

TRACY HILLARD

ENSOLUM

3122 NATIONAL PARKS HWY

CARLSBAD, NM 88220

RE: PLU BS 19 - 24 - 31 BATTERY - SPILLS

Enclosed are the results of analyses for samples received by the laboratory on 08/28/25 14:30.

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, flowing style.

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:	08/28/2025	Sampling Date:	08/27/2025
Reported:	09/04/2025	Sampling Type:	Soil
Project Name:	PLU BS 19 - 24 - 31 BATTERY - SPILLS	Sampling Condition:	Cool & Intact
Project Number:	03C1558714,03C1558728	Sample Received By:	Tamara Oldaker
Project Location:	XTO 32.210051-103.819324		

Sample ID: SS01 SURFACE (H255381-01)

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	08/29/2025	ND	1.69	84.4	2.00	3.12		
Toluene*	<0.050	0.050	08/29/2025	ND	1.83	91.4	2.00	4.41		
Ethylbenzene*	<0.050	0.050	08/29/2025	ND	1.94	96.9	2.00	4.09		
Total Xylenes*	<0.150	0.150	08/29/2025	ND	6.03	101	6.00	3.83		
Total BTEX	<0.300	0.300	08/29/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 114 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: KH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	08/29/2025	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	08/29/2025	ND	183	91.5	200	0.513	
DRO >C10-C28*	<10.0	10.0	08/29/2025	ND	182	90.9	200	0.134	
EXT DRO >C28-C36	<10.0	10.0	08/29/2025	ND					

Surrogate: 1-Chlorooctane 94.3 % 44.4-145

Surrogate: 1-Chlorooctadecane 89.5 % 40.6-153

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received: 08/28/2025
Reported: 09/04/2025
Project Name: PLU BS 19 - 24 - 31 BATTERY - SPILLS
Project Number: 03C1558714, 03C1558728
Project Location: XTO 32.210051-103.819324

Sampling Date: 08/27/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: SS02 SURFACE (H255381-02)

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	08/29/2025	ND	1.69	84.4	2.00	3.12		
Toluene*	<0.050	0.050	08/29/2025	ND	1.83	91.4	2.00	4.41		
Ethylbenzene*	<0.050	0.050	08/29/2025	ND	1.94	96.9	2.00	4.09		
Total Xylenes*	<0.150	0.150	08/29/2025	ND	6.03	101	6.00	3.83		
Total BTEX	<0.300	0.300	08/29/2025	ND						

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

Chloride, SM4500Cl-B		mg/kg		Analyzed By: KH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	08/29/2025	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	08/29/2025	ND	183	91.5	200	0.513	
DRO >C10-C28*	<10.0	10.0	08/29/2025	ND	182	90.9	200	0.134	
EXT DRO >C28-C36	<10.0	10.0	08/29/2025	ND					

Surrogate: 1-Chlorooctane 90.9 % 44.4-145

Surrogate: 1-Chlorooctadecane 89.4 % 40.6-153

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received: 08/28/2025
Reported: 09/04/2025
Project Name: PLU BS 19 - 24 - 31 BATTERY - SPILLS
Project Number: 03C1558714, 03C1558728
Project Location: XTO 32.210051-103.819324

Sampling Date: 08/27/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: SS03 SURFACE (H255381-03)

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	08/29/2025	ND	1.69	84.4	2.00	3.12		
Toluene*	<0.050	0.050	08/29/2025	ND	1.83	91.4	2.00	4.41		
Ethylbenzene*	<0.050	0.050	08/29/2025	ND	1.94	96.9	2.00	4.09		
Total Xylenes*	<0.150	0.150	08/29/2025	ND	6.03	101	6.00	3.83		
Total BTEX	<0.300	0.300	08/29/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 115 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	08/29/2025	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	08/29/2025	ND	187	93.4	200	0.108	
DRO >C10-C28*	<10.0	10.0	08/29/2025	ND	183	91.3	200	2.62	
EXT DRO >C28-C36	<10.0	10.0	08/29/2025	ND					

Surrogate: 1-Chlorooctane 92.0 % 44.4-145

Surrogate: 1-Chlorooctadecane 92.6 % 40.6-153

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received: 08/28/2025
Reported: 09/04/2025
Project Name: PLU BS 19 - 24 - 31 BATTERY - SPILLS
Project Number: 03C1558714, 03C1558728
Project Location: XTO 32.210051-103.819324

Sampling Date: 08/27/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: SS04 SURFACE (H255381-04)

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	08/29/2025	ND	1.69	84.4	2.00	3.12		
Toluene*	<0.050	0.050	08/29/2025	ND	1.83	91.4	2.00	4.41		
Ethylbenzene*	<0.050	0.050	08/29/2025	ND	1.94	96.9	2.00	4.09		
Total Xylenes*	<0.150	0.150	08/29/2025	ND	6.03	101	6.00	3.83		
Total BTEX	<0.300	0.300	08/29/2025	ND						

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	08/29/2025	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	08/29/2025	ND	187	93.4	200	0.108	
DRO >C10-C28*	<10.0	10.0	08/29/2025	ND	183	91.3	200	2.62	
EXT DRO >C28-C36	<10.0	10.0	08/29/2025	ND					

Surrogate: 1-Chlorooctane 88.5 % 44.4-145

Surrogate: 1-Chlorooctadecane 84.7 % 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: 08/28/2025
Reported: 09/04/2025
Project Name: PLU BS 19 - 24 - 31 BATTERY - SPILLS
Project Number: 03C1558714, 03C1558728
Project Location: XTO 32.210051-103.819324

Sampling Date: 08/27/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: SS05 SURFACE (H255381-05)

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	08/29/2025	ND	1.69	84.4	2.00	3.12		
Toluene*	<0.050	0.050	08/29/2025	ND	1.83	91.4	2.00	4.41		
Ethylbenzene*	<0.050	0.050	08/29/2025	ND	1.94	96.9	2.00	4.09		
Total Xylenes*	<0.150	0.150	08/29/2025	ND	6.03	101	6.00	3.83		
Total BTEX	<0.300	0.300	08/29/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 115 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	08/29/2025	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	08/29/2025	ND	187	93.4	200	0.108	
DRO >C10-C28*	<10.0	10.0	08/29/2025	ND	183	91.3	200	2.62	
EXT DRO >C28-C36	<10.0	10.0	08/29/2025	ND					

Surrogate: 1-Chlorooctane 90.2 % 44.4-145

Surrogate: 1-Chlorooctadecane 85.4 % 40.6-153

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Notes and Definitions

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

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

Caley 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

1-1

Company Name: Ensolum, LLC				BILL TO				ANALYSIS REQUEST																			
Project Manager: Tracy Hillard				P.O. #:																							
Address: 601 N Marienfeld Street, Suite 400				Company: XTO Energy, Inc																							
City: Midland State: TX Zip: 79701				Attn: Colton Brown																							
Phone #: (575) 937-3906 Fax #:				Address: 3104 E Greene St																							
Project #: 03C1558-14 03C1558-228				City: Carlsbad																							
Project Owner: XTO Energy				State: NM Zip: 88220																							
Project Name: PLU 85 19-24-31 Battery - SPILLS				Phone #:																							
Project Location: 32.210052, -103.819324				Fax #:																							
Sampler Name: Trevor Wargo																											
FOR LAB USE ONLY																											
Lab I.D.	Sample I.D.	Depth (feet)	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX					PRESERV.		SAMPLING															
					GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE / COOL	OTHER:	DATE	TIME												
H255381																											
1	5501	Surface	G	1										08/27/25	13:56												
2	5502													14:10													
3	5503													14:12													
4	5504													14:16													
5	5505													14:28													
																TBW											

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Relinquished By: Trevor Wargo	Date: 8-28-25	Received By: [Signature]	Verbal Result: ☐ Yes ☒ No	Add'l Phone #:
Time: 1430			All Results are emailed. Please provide Email address: twargo@ensolum.com	
Relinquished By:	Date:	Received By:	BBeili@ensolum.com, TMorrissey@ensolum.com, THillard@ensolum.com, KThomason@ensolum.com	
Time:			REMARKS: Incident Number: NAPP 2430551104, NAPP 2434134681	
Delivered By: (Circle One)	Observed Temp. °C: 0.1	Sample Condition: Cool ☒ Intact ☒	Cost Center: 1081301001	
Sampler - UPS - Bus - Other:	Corrected Temp. °C: 0.4	Yes ☐ No ☐	GFCM: 48605000	
		Checked By: [Signature]	Turnaround Time: Standard ☒ Rush ☐	
			Thermometer ID: #13 #140	
			Correction Factor: -0.5C +0.3C	
			Bacteria (only) Sample Condition: Cool ☐ Intact ☐	
			Observed Temp. °C: ☐ Yes ☐ No ☐	
			Corrected Temp. °C: ☐ Yes ☐ No ☐	

† Cardinal cannot accept verbal changes. Please email changes to coley.keene@cardinalabshnm.com



APPENDIX E

Spill Calculation nAPP2430551104

Location:	PLU BS 19-24-31 USA Battery	
Spill Date:	10/31/2024	
Area 1		
Approximate Area =	3698.00	sq. ft.
Average Saturation (or depth) of spill =	1.00	inches
Average Porosity Factor =	0.25	
VOLUME OF LEAK		
Total Crude Oil =		bbls
Total Produced Water =	70.00	bbls
TOTAL VOLUME OF LEAK		
Total Crude Oil =	0.00	bbls
Total Produced Water =	70.00	bbls
TOTAL VOLUME RECOVERED		
Total Crude Oil =		bbls
Total Produced Water =	70.00	bbls

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Oil Conservation Division
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QUESTIONS

Action 398005

QUESTIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 398005
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2430551104
Incident Name	NAPP2430551104 PLU BS 19-24-31 USA BATTERY @ 0
Incident Type	Produced Water Release
Incident Status	Initial C-141 Received

Location of Release Source

Please answer all the questions in this group.

Site Name	PLU BS 19-24-31 USA Battery
Date Release Discovered	10/31/2024
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: Normal Operations Pump Produced Water Released: 70 BBL Recovered: 70 BBL Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	No
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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QUESTIONS, Page 2

Action 398005

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 398005
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

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: Colton Brown Title: Environmental Advisor Email: colton.s.brown@exxonmobil.com Date: 10/31/2024
--	--

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QUESTIONS, Page 3

Action 398005

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 398005
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

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)	Not answered.
What method was used to determine the depth to ground water	Not answered.
Did this release impact groundwater or surface water	Not answered.
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	Not answered.
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Not answered.
An occupied permanent residence, school, hospital, institution, or church	Not answered.
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Not answered.
Any other fresh water well or spring	Not answered.
Incorporated municipal boundaries or a defined municipal fresh water well field	Not answered.
A wetland	Not answered.
A subsurface mine	Not answered.
An (non-karst) unstable area	Not answered.
Categorize the risk of this well / site being in a karst geology	Not answered.
A 100-year floodplain	Not answered.
Did the release impact areas not on an exploration, development, production, or storage site	Not answered.

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	No
<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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CONDITIONS

Action 398005

CONDITIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 398005
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	None	11/1/2024



APPENDIX F

Spill Calculation nAPP2434134681

Location:	PLU Big Sinks 19 24 31 USA Battery	
Spill Date:	12/5/2024	
Area 3		
Approximate Area =	3622.60	sq. ft.
Average Saturation (or depth) of spill =	0.01	inches
Average Porosity Factor =	0.25	
VOLUME OF LEAK		
Total Crude Oil =		bbls
Total Produced Water =	5.00	bbls
TOTAL VOLUME OF LEAK		
Total Crude Oil =	0.00	bbls
Total Produced Water =	5.00	bbls
TOTAL VOLUME RECOVERED		
Total Crude Oil =		bbls
Total Produced Water =	5.00	bbls

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QUESTIONS

Action 409529

QUESTIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 409529
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2434134681
Incident Name	NAPP2434134681 PLU BIG SINKS 19 24 31 USA BATTERY @ 0
Incident Type	Produced Water Release
Incident Status	Initial C-141 Received

Location of Release Source	
Please answer all the questions in this group.	
Site Name	PLU Big Sinks 19 24 31 USA Battery
Date Release Discovered	12/05/2024
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: Equipment Failure Pump Produced Water Released: 5 BBL Recovered: 5 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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QUESTIONS, Page 2

Action 409529

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 409529
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	More info needed to determine if this will be treated as a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	No
Reasons why this would be considered a submission for a notification of a major release	Unavailable.
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: Ashley McAfee Email: ashley.a.mcafee@exxonmobil.com Date: 12/06/2024
--	--

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QUESTIONS, Page 3

Action 409529

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 409529
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

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)	Not answered.
What method was used to determine the depth to ground water	Not answered.
Did this release impact groundwater or surface water	Not answered.
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	Not answered.
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Not answered.
An occupied permanent residence, school, hospital, institution, or church	Not answered.
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Not answered.
Any other fresh water well or spring	Not answered.
Incorporated municipal boundaries or a defined municipal fresh water well field	Not answered.
A wetland	Not answered.
A subsurface mine	Not answered.
An (non-karst) unstable area	Not answered.
Categorize the risk of this well / site being in a karst geology	Not answered.
A 100-year floodplain	Not answered.
Did the release impact areas not on an exploration, development, production, or storage site	Not answered.

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	No
<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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CONDITIONS

Action 409529

CONDITIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 409529
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

CONDITIONS

Created By	Condition	Condition Date
nvez	None	12/9/2024

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QUESTIONS

Action 515650

QUESTIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 515650
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2430551104
Incident Name	NAPP2430551104 PLU BS 19-24-31 USA BATTERY @ C-19-24S-31E
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	PLU BS 19-24-31 USA BATTERY
Date Release Discovered	10/31/2024
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: Normal Operations Pump Produced Water Released: 70 BBL Recovered: 70 BBL Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	No
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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QUESTIONS, Page 2

Action 515650

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 515650
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	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.
<i>With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.</i>	

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: Richard Kotzur Title: Senior Project Manager Email: NMEnvNotifications@exxonmobil.com Date: 10/15/2025
--	---

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QUESTIONS, Page 3

Action 515650

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 515650
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

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)	Between ½ and 1 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between ½ and 1 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Between 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)	820
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	382
GRO+DRO (EPA SW-846 Method 8015M)	231
BTEX (EPA SW-846 Method 8021B or 8260B)	0
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	12/05/2024
On what date will (or did) the final sampling or liner inspection occur	08/27/2025
On what date will (or was) the remediation complete(d)	08/19/2025
What is the estimated surface area (in square feet) that will be reclaimed	0
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	0
What is the estimated volume (in cubic yards) that will be remediated	0
<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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Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS, Page 4

Action 515650

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:
	5380
	Action Number:
	515650
	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

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:	
(Select all answers below that apply.)	
(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc.)	Not answered.
(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	The lined containment was cleaned of all debris and power washed, and a liner integrity inspection was conducted by Ensolum personnel on August 19, 2025. The lined containment was inspected, and it was determined to contain a small hole. Delineation to determine the extent of the release was warranted. Liner integrity inspection and delineation activities were conducted at the Site to address the October 2024 and December 2024 releases of produced water. Laboratory analytical results for the soil samples collected indicated that all COC concentrations were compliant with the Site Closure Criteria and/or reclamation standards where applicable. Based on the soil sample analytical results, no impacted soil was identified, and no further remediation was required. XTO patched all holes and tears in the liner following completion of delineation activities. Delineation of potential impacts at this Site determined that no soil that exceeded Site Closure Criteria was located below the lined containment. Depth to groundwater has been estimated to be greater than 100 feet bgs and no other sensitive receptors were identified near the Site.
<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: Richard Kotzur Title: Senior Project Manager Email: NMEnvNotifications@exxonmobil.com Date: 10/15/2025
<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>	

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>

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Action 515650

QUESTIONS (continued)

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	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 515650

QUESTIONS (continued)

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

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	497679
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	08/27/2025
What was the (estimated) number of samples that were to be gathered	25
What was the sampling surface area in square feet	5000

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	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	0
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	0
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 December 2024 release of produced water. Laboratory analytical results for the soil samples collected indicated that all COC concentrations were compliant with the Site Closure Criteria and/or reclamation standards where applicable. Based on the soil sample analytical results, no impacted soil was identified, and no further remediation was required. XTO patched all holes and tears in the liner following completion of delineation activities.
The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (in .pdf format) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.	
I hereby agree and sign off to the above statement	Name: Richard Kotzur Title: Senior Project Manager Email: NMEnvNotifications@exxonmobil.com Date: 10/15/2025

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Action 515650

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 515650

CONDITIONS

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	Action Number: 515650
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
nvez	Remediation has met 19.15.29 NMAC requirements. Soil impacts exceeding the reclamation standards have been left in place and are required to meet 19.15.29.13D (1) NMAC once the site is no longer reasonably needed for production or subsequent drilling ops.	11/13/2025