

NM OIL CONSERVATION
 ARTESIA DISTRICT

DEC 22 2015

Form C-141
 Revised August 8, 2011

District I
 1625 N. French Dr., Hobbs, NM 88240;
 District II
 811 S. First St., Artesia, NM 88210
 District III
 1000 Rio Brazos Road, Aztec, NM 87410
 District IV
 1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
 Energy Minerals and Natural Resources

Oil Conservation Division
 1220 South St. Francis Dr.
 Santa Fe, NM 87505

RECEIVED
 Submit 1 Copy to appropriate District Office in
 accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

NAB1535754357 OPERATOR Initial Report Final Report

Name of Company: BOPCO, L.P. <u>1100737</u>	Contact: Amy Ruth
Address: 522 W. Mermod, Suite 704 Carlsbad, N.M. 88220	Telephone No. 575-887-7329
Facility Name: James Ranch Unit #10 Battery	Facility Type: Exploration and Production
Surface Owner: Federal	Mineral Owner: Federal
API No. 30-015-23075	

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
H	1	23S	30E	1980	North	660	East	Eddy

Latitude 32.335560° Longitude -103.827584°

NATURE OF RELEASE

Type of Release	Produced Water	Volume of Release	81 bbls	Volume Recovered	40 bbls
Source of Release	Tank Overflow	Date and Hour of Occurrence	12/14/2015 time unknown	Date and Hour of Discovery	12/14/2015 11:15 am
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Mike Bratcher/Heather Patterson (NMOCD), Jim Amos (BLM)		
By Whom?	Amy Ruth	Date and Hour	12/14/2015 4:52 pm		
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	N/A		
If a Watercourse was Impacted, Describe Fully.* N/A					
Describe Cause of Problem and Remedial Action Taken.* Coupling on water transfer pump failed and pump shut down. Produced water tank filled and overflowed into the battery earthen containment. The pump was repaired.					
Describe Area Affected and Cleanup Action Taken.* The leak affected 1550 ft ² of well pad within the tank containment and standing fluids were recovered.					
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.					

Signature:		OIL CONSERVATION DIVISION	
Printed Name: Amy C. Ruth		Approved by Environmental Specialist:	
Title: Remediation Specialist		Approval Date: 12/23/15	Expiration Date: N/A
E-mail Address: AC.Ruth@basspet.com		Conditions of Approval: Remediation per O.C.D. Rules & Guidelines <input type="checkbox"/>	
Date: 12/22/2015 Phone: 432-661-0571		SUBMIT REMEDIATION PROPOSAL NO	

* Attach Additional Sheets If Necessary

LATER THAN: 1/24/16

2RP-3464

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	
District RP	2RP-3464
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party: XTO Energy, Inc	OGRID: 5380
Contact Name: Kyle Littrell	Contact Telephone: (432)-221-7331
Contact email: Kyle_Littrell@xtoenergy.com	Incident #: 2RP-3464
Contact mailing address 522 W. Mermod, Suite 704 Carlsbad, NM 88220	

Location of Release Source

Latitude 32.335560 Longitude -103.827584
(NAD 83 in decimal degrees to 5 decimal places)

Site Name James Ranch Unit #10 Battery	Site Type Exploration and Production
Date Release Discovered 12/14/15	API# (if applicable) 30-015-23075

Unit Letter	Section	Township	Range	County
H	1	23S	30E	Eddy

Surface Owner: State Federal Tribal Private (Name: BLM)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 81	Volume Recovered (bbls) 40
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

Coupling on water transfer pump failed and pump shut down. Produced water tank filled and overflowed into the battery earthen containment. The pump was repaired. The leak affected 1550 ft² of well pad within the tank containment and standing fluids were recovered. Fluids remained within the containment with exception of the southwest corner, though what little escaped remained on the well pad.

Form C-141

State of New Mexico
Oil Conservation Division

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Incident ID	
District RP	2RP-3464
Facility ID	
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Was this a major release as defined by 19.15.29.7(A) NMAC? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? The release was greater than 25 bbls.
---	---

If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?
 Yes, immediate notice was given by Amy Ruth to Mike Bratcher/ Heather Patterson (NMOCD), and Jim Amos (BLM) on 12/14/15.

Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
--

If all the actions described above have not been undertaken, explain why:

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

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.

Printed Name: Kyle Littrell Title: SH&E Coordinator
 Signature:  Date: 4/12/2019
 email: Kyle.Littrell@xtoenergy.com Telephone: 432-221-7331

OCD Only
 Received by: _____ Date: _____

Incident ID	
District RP	2RP-3464
Facility ID	
Application ID	

Site Assessment/Characterization

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?	<u>>150</u> (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: *Each of the following items must be included in the report.*

- Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- Field data
- Data table of soil contaminant concentration data
- Depth to water determination
- Determination of water sources and significant watercourses within 1/2-mile of the lateral extents of the release
- Boring or excavation logs
- Photographs including date and GIS information
- Topographic/Aerial maps
- Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

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District RP	2RP-3464
Facility ID	
Application ID	

Remediation Plan

Remediation Plan Checklist: Each of the following items must be included in the plan.

- Detailed description of proposed remediation technique
- Scaled sitemap with GPS coordinates showing delineation points
- Estimated volume of material to be remediated
- Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: Each of the following items must be confirmed as part of any request for deferral of remediation.

- Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- Extents of contamination must be fully delineated.
- Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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.

Printed Name: Kyle Littrell Title: SH&E Supervisor

Signature:  Date: 10/30/2019

email: Kyle_Littrell@xtoenergy.com Telephone: (432)-221-7331

OCD Only

Received by: _____ Date: _____

- Approved Approved with Attached Conditions of Approval Denied Deferral Approved

Signature: _____ Date: _____



LT Environmental, Inc.

3300 North "A" Street
Building 1, Unit 103
Midland, Texas 79705
432.704.5178

October 30, 2019

Mr. Mike Bratcher
New Mexico Oil Conservation Division
811 South First Street
Artesia, New Mexico 88210

**RE: Revised Remediation Work Plan – SVE System
James Ranch Unit #10 Battery
Remediation Permit Numbers 2RP-3179, 2RP-3464, and 2RP-5243
Eddy County, New Mexico**

Dear Mr. Bratcher:

LT Environmental, Inc. (LTE), on behalf of XTO Energy, Inc. (XTO), is pleased to present the New Mexico Oil Conservation Division (NMOCD) with this Revised Remediation Work Plan (Work Plan) for the James Ranch Unit #10 Battery (Site). The Site is located in Unit H, Section 1, Township 23 South, Range 30 East, in Eddy County, New Mexico (Figure 1).

This Work Plan summarizes the release history, assessment, and remediation activities completed to date and the proposed remedial actions, specifically the installation and operation of a soil vapor extraction (SVE) system, to address residual subsurface soil impacts at the Site. The Work Plan is submitted to comply with Title 19, Chapter 15, Part 29 (19.15.29) of the New Mexico Administrative Code (NMAC) as amended on August 14, 2018 and Bureau of Land Management (BLM) requirements for no further actions related to these releases. The Work Plan addresses comments from the NMOCD to conduct active remediation of subsurface hydrocarbon impacts.

BACKGROUND

Of the three open Remediation Permits (RPs) at the Site, two of the RPs (2RP-3179 and 2RP-3464) occurred while the facility was operated by the previous operator; however, XTO is the current operator and is committed to addressing any releases that remain unresolved. The releases were reported to NMOCD on a Release Notification and Corrective Action Form C-141 (Form C-141) and were assigned RP Numbers, which are included as Attachment 1.

Since the three releases occurred in the tank battery containment area, excavation and sampling activities were completed to address the three releases concurrently. RP Numbers 2RP-3179 and 2RP-3464 are included in the Compliance Agreement for Remediation for Historical Releases (Compliance Agreement) between XTO and NMOCD, effective November 13, 2018. The purpose of the Compliance Agreement is to ensure reportable releases that occurred prior to August 14, 2018, where XTO is responsible for the corrective action, comply with 19.15.29 NMAC. The





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releases are categorized as a Tier III sites in the Compliance Agreement, meaning remediation of the releases began prior to August 14, 2018, the effective date of 19.15.29 NMAC; however, remediation was ongoing.

Spill response activities at the Site included excavation of impacted soil from February through April of 2019. Following initial excavation activities, LTE drilled into the subsurface with a hollow stem auger drilling rig to depths ranging from approximately 10 feet to 80 feet below ground surface (bgs) to vertically delineate subsurface soil impacts. Based on results from the drilling event, a production tank was relocated, and additional excavation was conducted. A liner was proposed in a Proposed Remediation Work Plan, dated April 12, 2019, and subsequently installed to address impacts to soil not removed by excavation. The Proposed Remediation Work Plan was denied with comments from NMOCD and BLM concerning depth to groundwater, additional delineation, and active remediation of mobile petroleum hydrocarbons in the subsurface. As a result, LTE submitted a Revised Remediation Work Plan, dated June 28, 2019. The Revised Remediation Work Plan summarized additional delineation by sonic drill rig, confirmation of depth to groundwater as greater than 150 feet bgs, and an analysis of exposure pathways to nearby receptors.

The additional drilling data allowed for revision of Closure Criteria presented in earlier reports. The following NMOCD Table 1 Closure Criteria were determined for the Site:

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

The Revised Remediation Work Plan supported excavation and liner installation, relocation of the tank battery, and continued natural attenuation of residual subsurface soil impacts beneath the liner.

NMOCD denied the Revised Remediation Work Plan on July 25, 2019, and required a method for mitigating the deeper impacts, specifically, the light end hydrocarbons at depth. In response, LTE has evaluated remediation alternatives for the Site and conducted pilot testing for an SVE system. The result of these efforts is presented in the subsequent sections of this report and were used to design an active remedial approach to address petroleum hydrocarbons that exist deeper than is practical to excavate.





Completed Remediation Activities

As outlined in the Revised Remediation Action Plan submitted on June 28, 2019, XTO has performed the following remedial actions to address the releases associated with RP Numbers 2RP-3179, 2RP-3464, and 2RP-5243:

- Free standing crude oil and produced water were vacuumed off the well pad to minimize saturation into surficial soil and future vertical migration;
- Excavation and disposal of produced water and crude oil impacted soil from the top 4 feet. Surficial soil impacts have been remediated to 4 feet bgs as determined by field screening and laboratory analytical results for confirmation sidewall soil samples and delineation soil samples. Approximately 1,740 cubic yards of impacted soil were excavated and disposed of between February and April 2019; and
- A 30-mil poly liner was installed at the base of the excavation on April 12, 2019 to address any elevated subsurface chloride concentrations. The liner covered a surface area of approximately 11,230 square feet and extended up the sidewalls approximately 2 to 3 feet;
- To minimize the potential of future releases in the vicinity of these three open RPs, XTO constructed their tank battery in a different location within the Site. In addition, XTO evaluated the integrity of all equipment and components utilized in the construction of the tank battery to reduce the likelihood of future releases due to faulty and/or worn equipment and/or components.

SOIL VAPOR EXTRACTION PILOT TEST

LTE conducted an SVE pilot test to assess the viability of SVE to reduce and remediate residual petroleum hydrocarbon impacts as an alternative remediation approach. The petroleum hydrocarbon impacts are generally volatile (relatively high Henry's Constant) and amenable to microbial degradation processes. SVE has been an industry standard, cost effective technology for *in-situ* remediation of petroleum hydrocarbons. The objective of the SVE pilot test was to evaluate the effectiveness of the remedial technology to achieve site remediation cleanup goals. SVE pilot testing results assist in determining the required flow rate and applied vacuum to influence the subsurface and cause volatilization of petroleum hydrocarbons adsorbed to subsurface soil and to determine site-specific design radius of influence (ROI). The pilot testing program was designed based on previously observed geologic conditions, surface conditions, and current lateral and vertical extents of petroleum hydrocarbon impacts. Two SVE screen depths were tested (25 feet to 45 feet bgs and 15 feet to 30 feet bgs) to encourage uniform flow throughout the highest impacted interval (20 feet to 45 feet bgs).





SVE Well Installation

Four SVE wells (SVE-PT-01 through SVE-PT-04) were installed prior to testing in the locations presented on Figure 2. During the advancement of each SVE well, continuous soil sampling was conducted, which included describing the lithology based on the Unified Soil Classification System (USCS) as specified in American Society for Testing and Materials (ASTM) D2488, observations of staining and odors, and field screening of volatile aromatic hydrocarbons and chloride utilizing a calibrated photo-ionization detector (PID) and Hach® chloride QuanTab® test strips, respectively. Soil boring logs were completed at the time of drilling and are provided with the construction diagrams of the SVE wells as Attachment 2.

Soil samples from the four SVE wells were not submitted for laboratory analysis due to their proximity of previously drilled and sampled boreholes. Based on the soil boring logs and observations made during all subsurface investigations, lithology in the vicinity of the three releases was generally characterized as the following:

- 5 feet to 20 feet bgs was a mix of poorly graded to well graded sand, and
- 20 feet to approximately 50 feet bgs was classified as sandstone and claystone.

Soil boring SVE-PT-01 was completed to a depth of approximately 45 feet bgs, while SVE-PT-02, SVE-PT-03, and SVE-PT-04 were completed to a depth of approximately 30 feet bgs. The SVE wells were constructed with 2-inch polyvinyl chloride (PVC) casing. A 10-foot section of 0.010-inch slotted PVC screen was installed at the base of SVE wells SVE-PT-02 and SVE-PT-03. A 20-foot and 15-foot section of 0.010-inch slotted PVC screens were installed at the base of SVE wells SVE-PT-01 and SVE-PT-04, respectively. A 10-20 size silica sand pack was used to fill the annular space from the bottom of the screen to approximately 1 foot above the top of screen. Two feet of hydrated bentonite chips was placed on top of the sand pack. The well was then grouted from the top of the bentonite chips to the ground surface. The PVC casing for the SVE wells extended beyond the ground surface approximately 3 feet and protected with steel well protector monuments.

Pilot Testing Procedure

Vacuum was applied to two of the SVE wells (SVE-PT-01 and SVE-PT-04), while the other two SVE wells were utilized as observation wells (SVE-PT-02 and SVE-PT-03). SVE wells SVE-PT-02 and SVE-PT-03 will ultimately be utilized for full-scale SVE design. The SVE wells were screened across different lithologies observed in the subsurface to test applied vacuum responses and influence within those lithologies.

A vacuum was applied to the SVE wells via a vacuum truck and through a manifold designed to measure applied vacuum, flowrate, and vapor concentrations. The first test was conducted by applying a vacuum at SVE well SVE-PT-01. The same procedure was repeated for the pilot test on





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SVE well SVE-PT-04. Pilot test monitoring data (applied vacuum, air flow rate, and volatile aromatic hydrocarbons stack measurements) were recorded at the test well, while (vacuum response) was measured at surrounding SVE wells during performance of the test. The following procedures were followed when conducting the SVE pilot test:

1. Measured the distances from the test SVE well to each observation well;
2. Collected background volatile organic compound measurements using a calibrated PID at the test SVE and observation wells;
3. Connected the vacuum truck to the test SVE well via a flexible hose and manifold then slowly opened the valve and monitored the vacuum and flow rate;
4. Applied a vacuum ranging from approximately 10 inches of water column (wc) to 50 inches wc at the designated SVE well for each test;
5. Measured at least two events of stabilized vacuum/flow rate. Measured the vacuum at the observation wells and PID measurements from the test SVE well. Collected readings 15 minutes apart;
6. After the test SVE well vacuum readings stabilized, the applied vacuum was increased by reducing the amount of blower bypass air and collected the above measurements at the higher vacuum/flow rate;
7. Closed the valve to eliminate the vacuum pressure and collected stabilization readings from each observation well;
8. At the conclusion of the testing period, the blower was turned off, the system was allowed to equilibrate, and a final round of vacuum readings was collected from the observation wells; and
9. Collected air emission samples from SVE well SVE-PT-04 in laboratory-prepared containers and delivered under strict chain of custody (COC) protocol to Xenco Laboratories located in Midland, Texas (Xenco) for analysis of BTEX and total volatile petroleum hydrocarbons (TVPH).

The resulting field measurements were reviewed, and vacuum measurements were plotted versus distance from the appropriate SVE well. Diagrams were generated for each of the different vacuum/flowrates tested. All test forms and diagrams are provided as Attachment 3. The laboratory analytical report for the air emission sample is provided in Attachment 4.

SVE Pilot Test Results

Pilot test data appears to indicate SVE is a viable technology to remediate petroleum hydrocarbons at the Site. The introduction of a vacuum into the subsurface enhanced





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volatilization of petroleum hydrocarbons throughout the tested impacted soil column. SVE vacuum influences were observed in all SVE wells during each test.

An effective SVE ROI of approximately 30 feet to 40 feet was graphically estimated from a plot of the observed vacuum response versus the distance from the applied vacuum. Influence of greater than 0.1 inches wc was observed during testing of SVE well SVE-PT-01 via vacuum and flow rates ranging from 10 inches wc at 4 actual cubic feet per minute (acfm) to 50 inches wc at 14 acfm. Influence of greater than 2.5 inches wc was observed during testing of SVE well SVE-PT-04 via vacuum and flow rates ranging from 10 inches wc at 60 acfm to 35 inches wc at 124 acfm. LTE believes a lower flow rate during testing of SVE well SVE-PT-04 would produce similar results. Full-scale design is based on 20 acfm per well at 30 inches wc.

The air emission sample collected during testing of SVE well SVE-PT-04 indicated recovery of total petroleum hydrocarbons – gasoline range organics (TPH-GRO) and BTEX. In the air stream, TPH-GRO was detected at a concentration of 20.2 milligrams per liter (mg/L) and total BTEX was detected at 0.957 mg/L. The air emission sample results are included as Table 1. At a full-scale design flow rate of 200 acfm, it is estimated the initial petroleum hydrocarbon removal rate would be as high as 360 pounds TPH per day and 17 pounds BTEX per day. As the system remediates subsurface soil, the removal rate is anticipated to decline via first order decline rate. The petroleum hydrocarbon concentration detected in the SVE pilot test emissions further demonstrates the technology is a viable remedial approach for the deeper subsurface soil impacts. Air emission samples will be collected during full scale system operation to track remediation progress and to model anticipated shutdown dates.

PROPOSED SVE SYSTEM DESIGN

An additional six SVE wells are recommended to influence the hydrocarbon impacted area in both the horizontal and vertical extents, for a total of 10 SVE wells. A well layout plan is included as Figure 3. Figures 4, 5, and 6 illustrate the SVE wells influencing different intervals at depths, 5 feet to 20 feet bgs, 15 feet to 30 feet bgs, and 25 feet to 65 feet bgs (shallow, medium, and deep), respectively. The well screened intervals are included as Table 2.

For the full-scale system, it is recommended that the vacuum blower be capable of at least 200 acfm at 50 inches wc. This would allow the system to operate 20 acfm per well at a vacuum of at least 30 inches wc. The SVE system will be powered with an electrical drop that will operate a regenerative or rotary lobe blower. The full-scale system will include a manifold with vacuum gauges to adjust system operations as necessary. Measurements of volatile organic compounds with a PID will be collected per zone or well to determine the area of the site to focus operations. Upon approval of this Work Plan, the remediation system equipment and parts will be sourced.

LTE anticipates the system will operate for a one to two-year period to remediate the residual subsurface impacts. An estimated timeline breakdown includes:





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- Equipment sourcing, manufacturing, and delivery is expected to take 3 months and will be completed by January 31, 2020;
- Well installation is anticipated to take one week;
- System installation and startup is expected to take two weeks and will be completed by February 28, 2020;
- Operation and Maintenance (O&M) will be performed weekly for the first month after initial startup;
- Monthly O&M checks on the system will be performed over the lifecycle of the system;
- Air emission samples will be collected at startup, two weeks, one month, two months, three months, then quarterly for the lifecycle of the system;
- Quarterly reports documenting runtime, air emission sampling results, and O&M data with any system changes or recommendations will be provided to NMOCD;
- Once air monitoring results indicate a TPH concentration of below 1 mg/L and the system has operated for at least a one-year period, confirmation soil samples will be collected. If the stack emissions do not drop below 1 mg/L TPH then confirmation sampling will occur following two years of system operation; and
- Confirmation soil samples will be collected in the vicinity of boreholes BH01, BH07, and BH08 and pothole PH01. Continuous sampling will be conducted via field screenings with a PID. Samples will be collected from similar intervals exceeding the Closure Criteria and submitted for laboratory analysis of BTEX and TPH.

Should NMOCD require more than 30 days to review and respond to this report, XTO reserves the right to modify the proposed schedule.

LTE, on behalf of XTO, requests approval of this Work Plan and implementation of the SVE system. If you have any questions or comments, please do not hesitate to contact Mr. Robert Rebel at (303) 548-5097 or Ms. Ashley Ager at (970) 946-1093.

Sincerely,

LT ENVIRONMENTAL, INC.

A handwritten signature in blue ink that reads "Robert T. Rebel". The signature is written in a cursive, flowing style.

Robert Rebel, P.E.
Senior Engineer

A handwritten signature in blue ink that reads "Ashley L. Ager". The signature is written in a cursive, flowing style.

Ashley L. Ager, P.G.
Senior Geologist





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cc: Kyle Littrell, XTO
Bradford Billings, NMOCD
Robert Hamlet, NMOCD
Jim Amos, U.S. Bureau of Land Management

Attachments:

Figure 1 Site Location Map
Figure 2 FULL-SCALE SVE Pilot Test Layout
Figure 3 Proposed SVE System Layout
Figure 4 Shallow SVE Well Layout (5-20 feet bgs)
Figure 5 Medium SVE Well Layout (15-30 feet bgs)
Figure 6 Deep SVE Well Layout (25-65 feet bgs)

Table 1 Air Analytical Results
Table 2 SVE Well Completions

Attachment 1 Initial / Final NMOCD Form C-141s (2RP-3179, 2RP-3463, and 2RP-5243)
Attachment 2 Lithologic/Soil Sampling Logs
Attachment 3 Pilot Test Data
Attachment 4 Laboratory Analytical Report



FIGURES



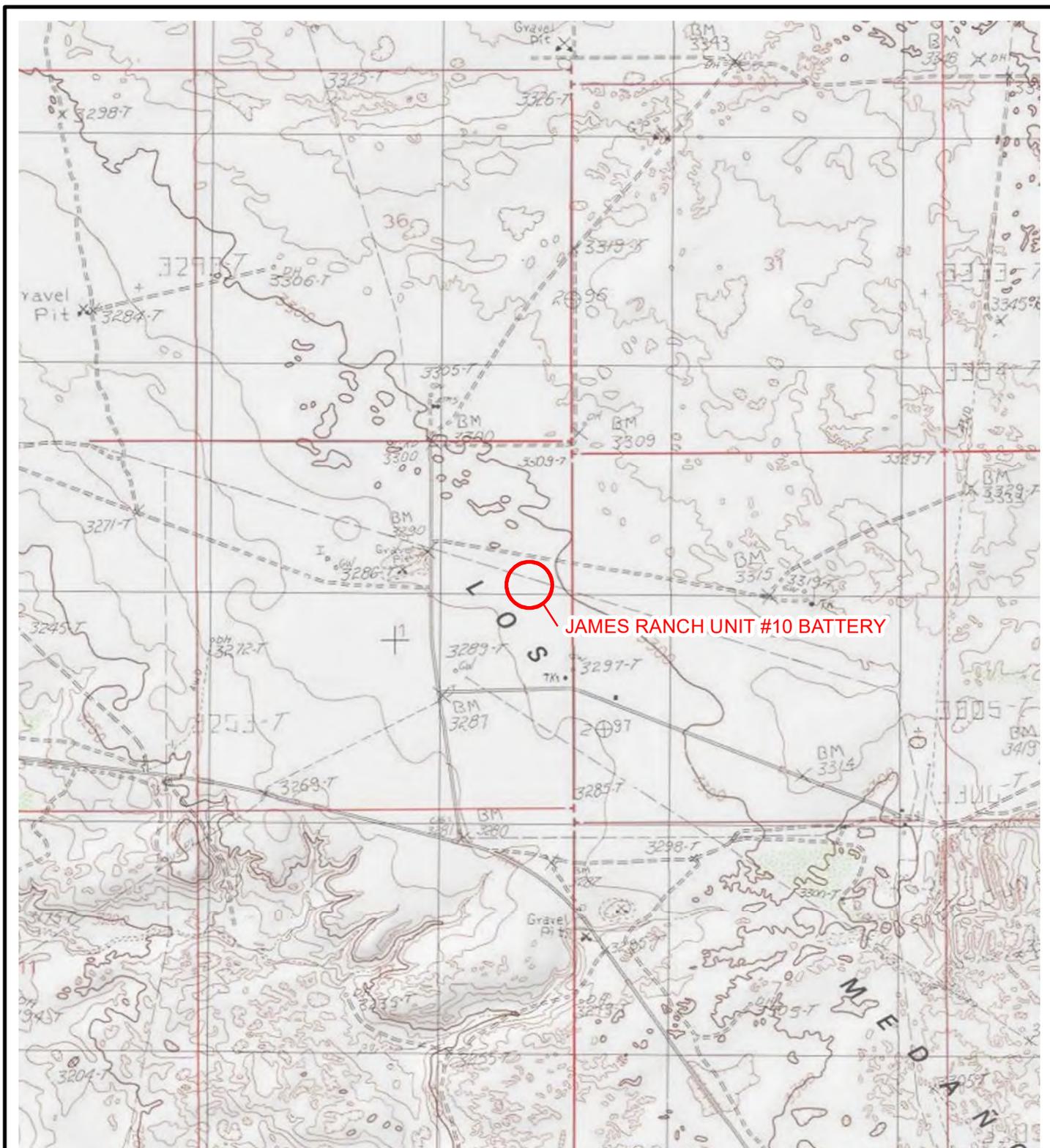
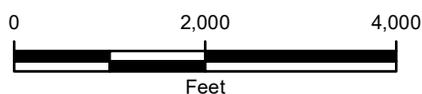


IMAGE COURTESY OF ESRI/USGS

LEGEND

 SITE LOCATION



NOTE: REMEDIATION PERMIT NUMBERS 2RP-3179, 2RP-3464, & 2RP-5243

FIGURE 1
SITE LOCATION MAP
JAMES RANCH UNIT #10 BATTERY
UNIT H SEC 1 T23S R30E
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.





IMAGE COURTESY OF GOOGLE EARTH 2017

LEGEND

■ PROPOSED SOIL VAPOR EXTRACTION WELL

□ ESTIMATED AREA OF IMPACTS, LINED

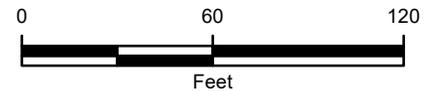


FIGURE 2
SVE PILOT TEST LAYOUT
JAMES RANCH UNIT #10 BATTERY
UNIT H SEC 1 T23S R30E
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.



NOTE: REMEDIATION PERMIT NUMBERS 2RP-3179, 2RP-3464, & 2RP-5243

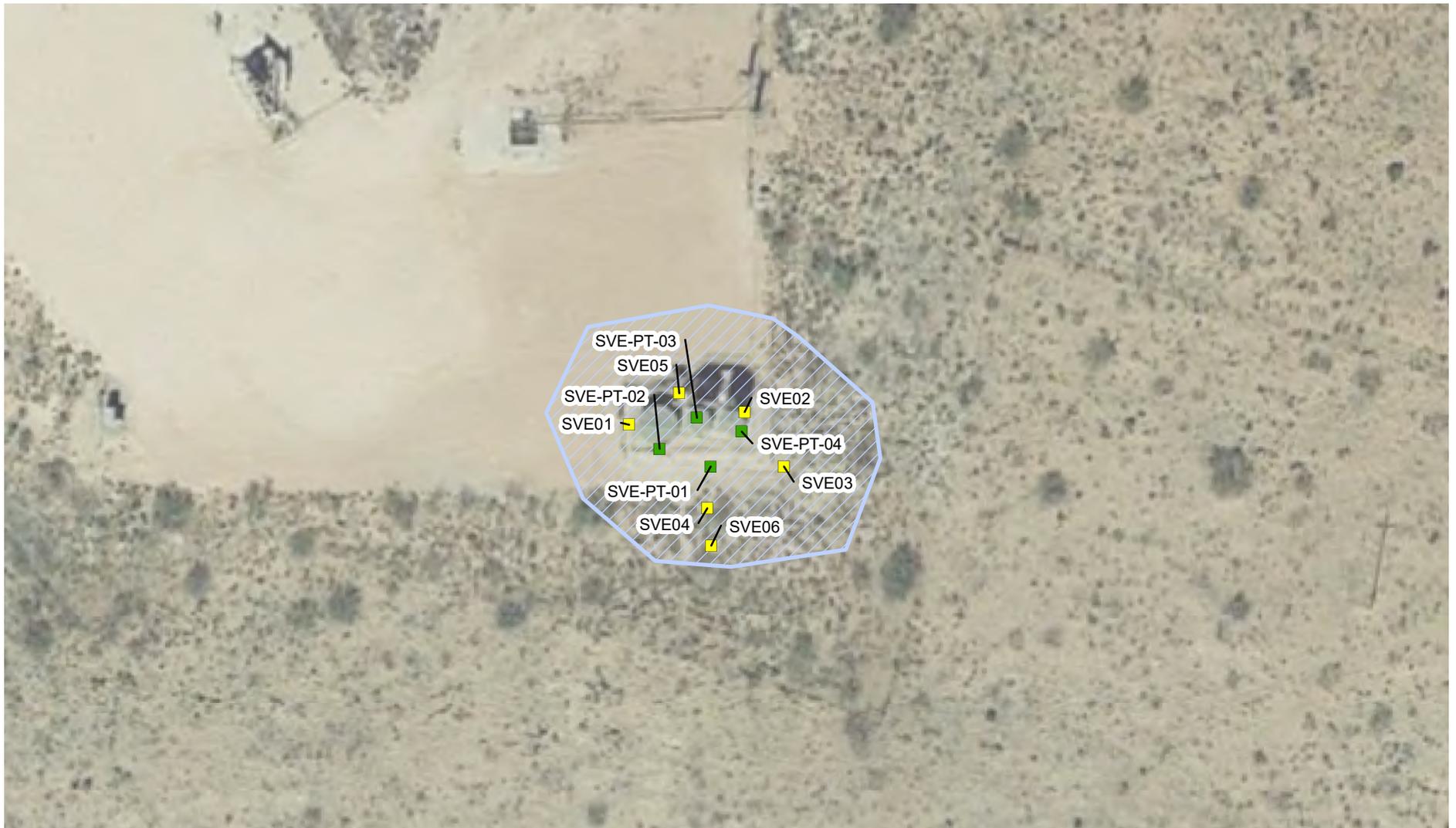
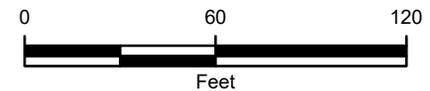


IMAGE COURTESY OF GOOGLE EARTH 2017

LEGEND

- COMPLETED WELLS
- ADDITIONAL PROPOSED WELLS
- LINER EXTENT



SVE: SOIL VAPOR EXTRACTION
 NOTE: REMEDIATION PERMIT NUMBERS 2RP-3179, 2RP-3464, & 2RP-5243

FIGURE 3
 FULL-SCALE SVE SYSTEM LAYOUT
 JAMES RANCH UNIT #10 BATTERY
 UNIT H SEC 1 T23S R30E
 EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.



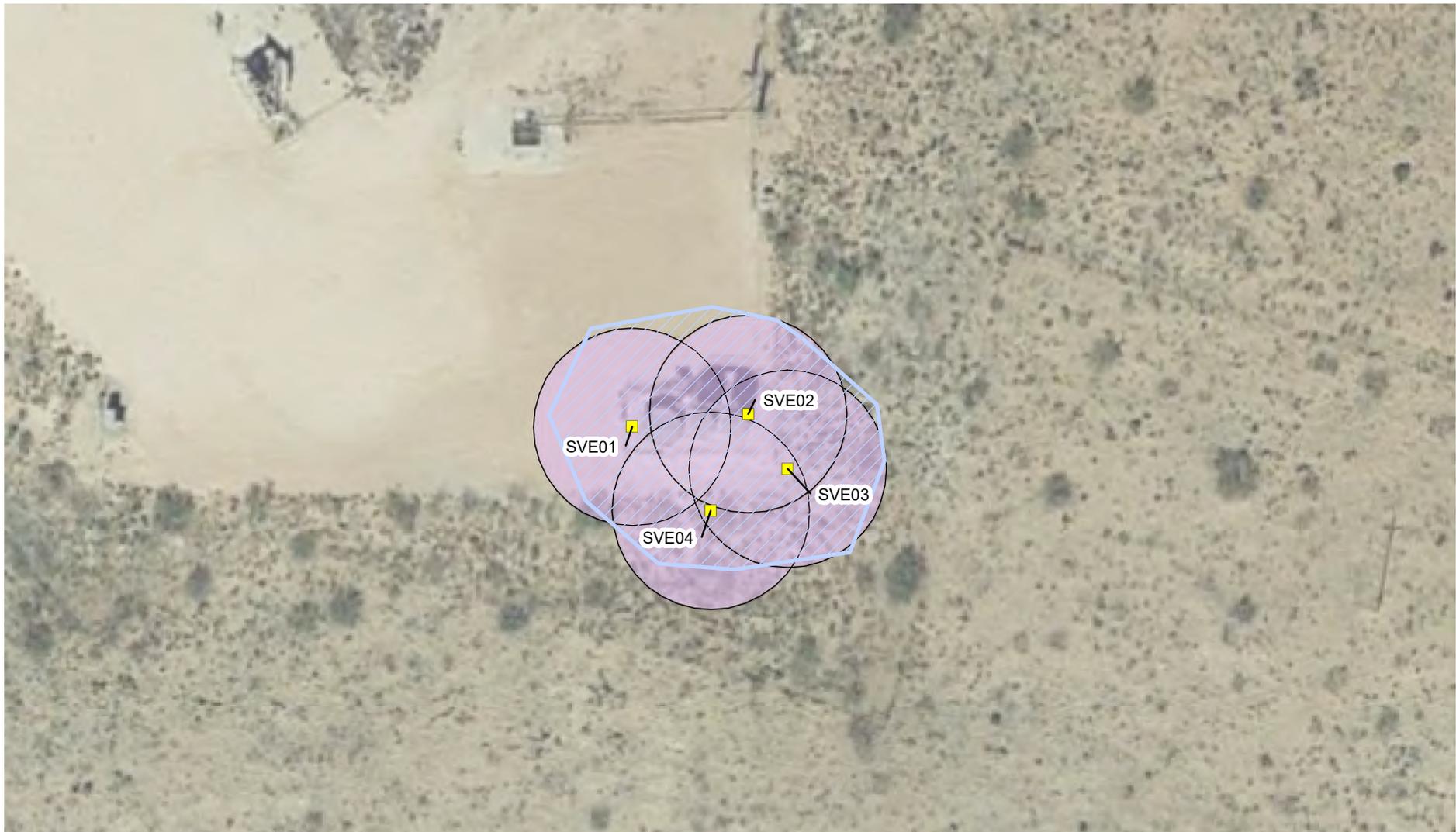


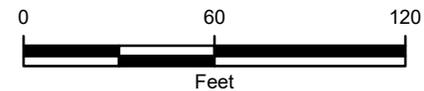
IMAGE COURTESY OF GOOGLE EARTH 2017

LEGEND

■ ADDITIONAL PROPOSED WELLS

▨ LINER EXTENT

○ 40 FOOT RADIUS OF INFLUENCE



BGS: BELOW GROUND SURFACE
 SVE: SOIL VAPOR EXTRACTION
 NOTE: REMEDIATION PERMIT NUMBERS 2RP-3179, 2RP-3464, & 2RP-5243

FIGURE 4
 SHALLOW SVE WELL LAYOUT (5-20 FEET BGS)
 JAMES RANCH UNIT #10 BATTERY
 UNIT H SEC 1 T23S R30E
 EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.



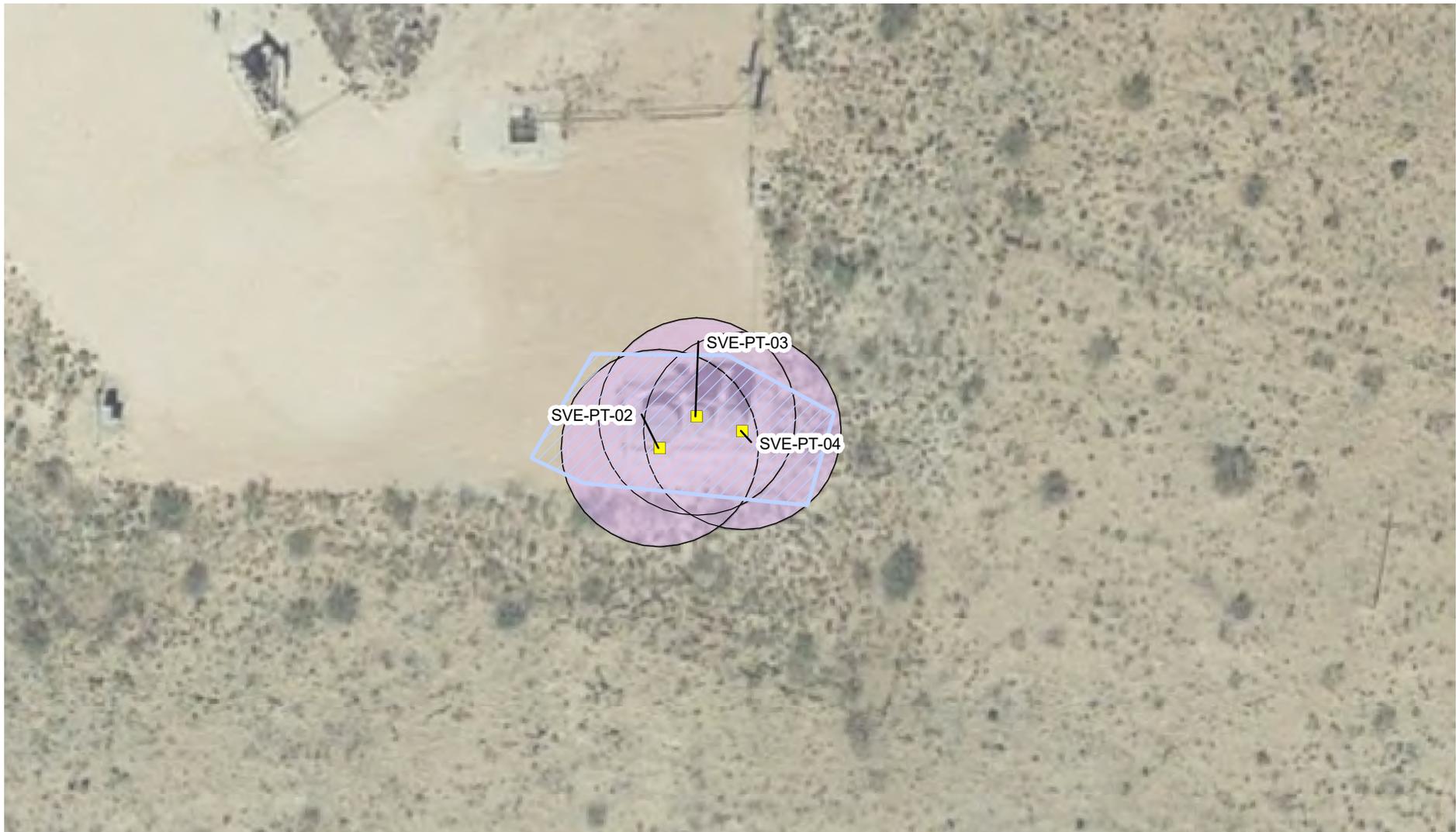


IMAGE COURTESY OF GOOGLE EARTH 2017

LEGEND

- ADDITIONAL PROPOSED WELLS
- ESTIMATED EXTENT OF IMPACT
- 40 FOOT RADIUS OF INFLUENCE

BGS: BELOW GROUND SURFACE
 SVE: SOIL VAPOR EXTRACTION
 NOTE: REMEDIATION PERMIT NUMBERS 2RP-3179, 2RP-3464, & 2RP-5243

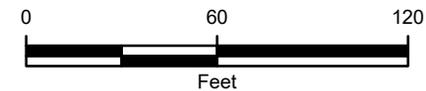


FIGURE 5
 MEDIUM SVE WELL LAYOUT (15-30 FEET BGS)
 JAMES RANCH UNIT #10 BATTERY
 UNIT H SEC 1 T23S R30E
 EDDY COUNTY, NEW MEXICO
 XTO ENERGY, INC.



P:\XTO Energy\GIS\MXD\012918003_JRU 10 TANK BATTERY\012918003_FIG05_SVE_MEDIUM WELL_3197.mxd

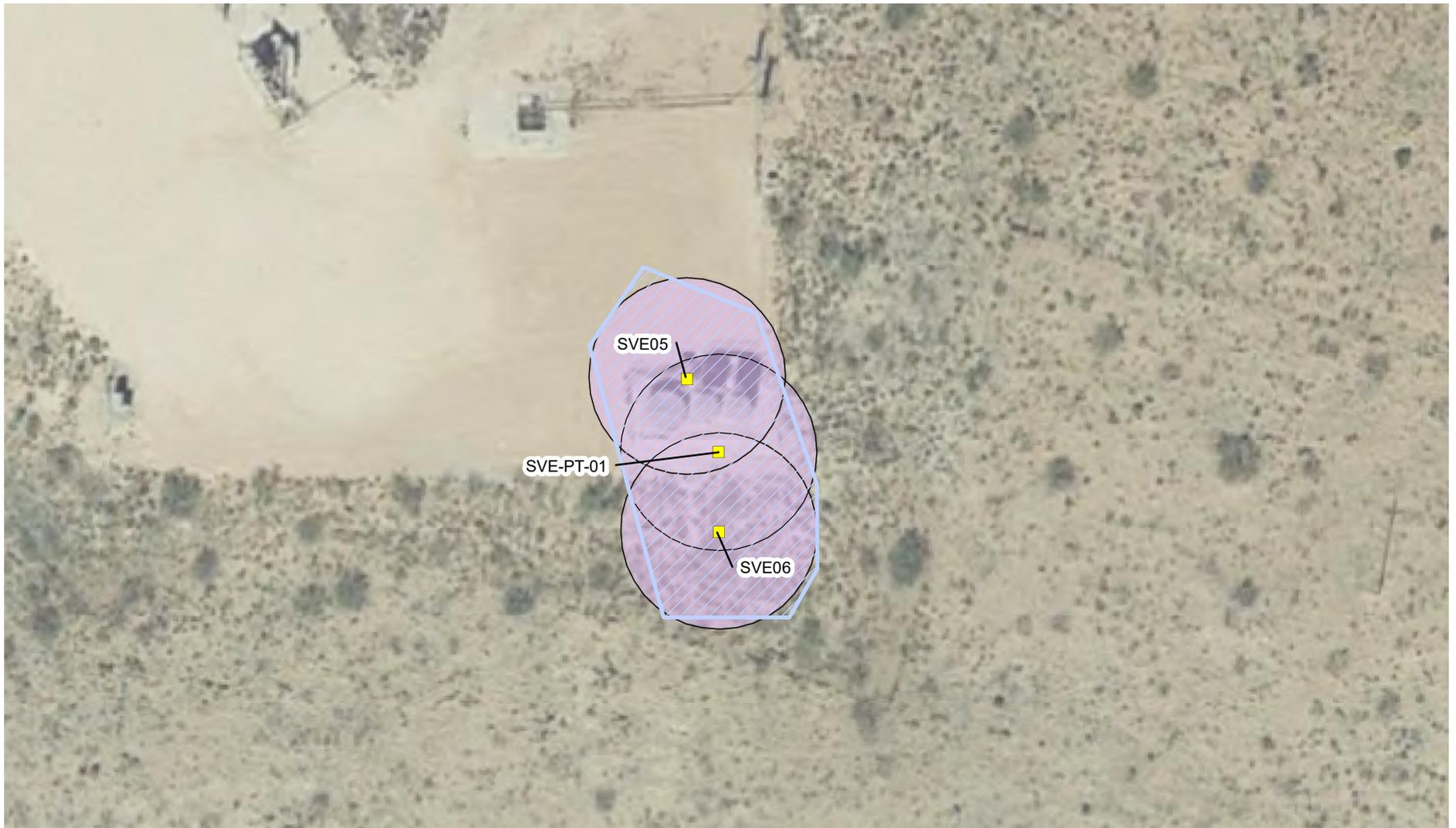


IMAGE COURTESY OF GOOGLE EARTH 2017

LEGEND

- ADDITIONAL PROPOSED WELLS
- ESTIMATED EXTENT OF IMPACT
- 40 FOOT RADIUS OF INFLUENCE

BGS: BELOW GROUND SURFACE
 SVE: SOIL VAPOR EXTRACTION
 NOTE: REMEDIATION PERMIT NUMBERS 2RP-3179, 2RP-3464, & 2RP-5243

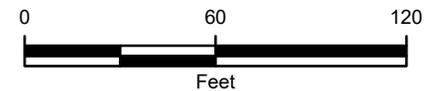


FIGURE 6
 DEEP SVE WELL LAYOUT (25-65 FEET BGS)
 JAMES RANCH UNIT #10 BATTERY
 UNIT H SEC 1 T23S R30E
 EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.



TABLES



TABLE 1
AIR ANALYTICAL RESULTS
REVISED REMEDIATION WORK PLAN
JAMES RANCH UNIT #10 BATTERY
REMEDIATION PERMIT NUMBERS 2RP-3179, 2RP-3464, and 2RP-5243
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.

Sample Name	Sample Date	Benzene (mg/L)	Toluene (mg/L)	Ethyl-benzene (mg/L)	Total Xylenes (mg/L)	Total BTEX (mg/L)	TPH-GRO (mg/L)
SVE-PT-04	10/01/2019	0.0722	0.370	0.0208	0.494	0.957	20.2

Notes:

BTEX - benzene, toluene, ethylbenzene, and total xylenes

GRO - gasoline range organics

mg/L - milligrams per Liter

TPH - total petroleum hydrocarbons

**TABLE 2
SOIL VAPOR EXTRACTION (SVE) WELL COMPLETIONS**

**JAMES RANCH UNIT #10 BATTERY
REMEDIATION PERMIT NUMBERS 2RP-3179, 2RP-3464, and 2RP-5243
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.**

SOIL VAPOR EXTRACTION WELL	TOTAL DEPTH (FEET)	BENTONITE WELL SEAL (FEET)	SAND PACK (FEET)	CASING (FEET)	WELL SCREEN (FEET)
SVE-PT-01	45	28	17	25	20
SVE-PT-02	30	18	12	20	10
SVE-PT-03	30	18	12	20	10
SVE-PT-04	30	18	12	15	15
SVE-01	20	10	10	10	10
SVE-02	15	5	10	5	10
SVE-03	20	10	10	10	10
SVE-04	20	10	10	10	10
SVE-05	60	40	20	45	15
SVE-06	65	45	20	50	15

Notes:

Drill with auger rig

0.010 slot screen

SVE-PT wells were installed on September 18, 2019 for the pilot test

ATTACHMENT 1: INITIAL/FINAL NMOCD FORM C-141 (2RP-3179, 2RP-3464, and 2RP-5243)



District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Form C-141
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

NAB1521257588

OPERATOR

Initial Report Final Report

Name of Company: BOPCO, L.P. <i>2100137</i>	Contact: Tony Savoie
Address: 522 W. Mermod, Suite 704 Carlsbad, N.M. 88220	Telephone No. 575-887-7329
Facility Name: JRU-10	Facility Type: Exploration and Production

Surface Owner: Federal	Mineral Owner: Federal	API No. 30-015-23075
------------------------	------------------------	----------------------

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
H	1	23S	30E	1980	North	660	East	Eddy

Latitude N 32.335568° Longitude W 103.827592°

NATURE OF RELEASE

Type of Release: Produced water and condensate	Volume of Release: 50 bbls. PW and 5 bbls. condensate	Volume Recovered: 13 bbls. PW and 2 bbls. condensate
Source of Release: Produced water tank	Date and Hour of Occurrence: 7/29/15, time unknown	Date and Hour of Discovery: 7/29/15 at approximately 8:30 a.m.
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Mike Bratcher, Heather Patterson, and Jim Amos	
By Whom? Tony Savoie	Date and Hour 7/29/15, first attempt at 1:51 p.m. confirmed at 6:14 p.m.	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

NM OIL CONSERVATION
ARTESIA DISTRICT
JUL 30 2015

RECEIVED

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*
A coupling on the water transfer pump failed causing the tank to overflow. The coupling was replaced the day of the release.

Describe Area Affected and Cleanup Action Taken.*
The spill impacted about 1000 sq.ft. inside the earthen containment around the Oil and PW tanks. All of the free standing fluid was recovered with a vacuum truck.
The spill area will be cleaned up in accordance to the NMOC and BLM remediation guidelines.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOC 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 NMOC marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOC 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.

Signature: <i>Tony Savoie</i>	OIL CONSERVATION DIVISION	
Printed Name: Tony Savoie	Approved by Environmental Specialist: <i>[Signature]</i>	
Title: Waste Management and Remediation Specialist	Approval Date: <i>7/31/15</i>	Expiration Date: <i>N/A</i>
E-mail Address: <i>tasavoie@busspet.com</i>	Conditions of Approval: Remediation per O.C.D. Rules & Guidelines	
Date: <i>7/30/15</i> Phone: 432-556-8730	Attached <input type="checkbox"/>	

* Attach Additional Sheets If Necessary

MIT REMEDIATION PROPOSAL NO
ATER THAN: 9/31/15

2RP-3179

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural
Resources Department

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Incident ID	
District RP	2RP-3179
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party: XTO Energy, Inc	OGRID: 5380
Contact Name: Kyle Littrell	Contact Telephone: (432)-221-7331
Contact email: Kyle_Littrell@xtoenergy.com	Incident #: 2RP-3179
Contact mailing address 522 W. Mermod, Suite 704 Carlsbad, NM 88220	

Location of Release Source

Latitude 32.335568 _____ Longitude -103.827592 _____
(NAD 83 in decimal degrees to 5 decimal places)

Site Name JRU-10	Site Type Exploration and Production
Date Release Discovered 07/29/15	API# (if applicable) 30-015-23075

Unit Letter	Section	Township	Range	County
H	1	23S	30E	Eddy

Surface Owner: State Federal Tribal Private (Name: BLM _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 50	Volume Recovered (bbls) 13
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input checked="" type="checkbox"/> Condensate	Volume Released (bbls) 5	Volume Recovered (bbls) 2
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

A coupling on the water transfer pump failed causing the tank to overflow. The coupling was replaced the day of the release. The spill impacted about 1000 sq.ft. inside the earthen containment around the Oil and produced water tanks. All of the free standing fluid was recovered with a vacuum truck.

Form C-141

State of New Mexico
Oil Conservation Division

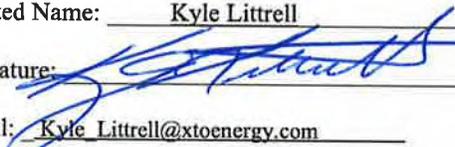
Page 2

Incident ID	
District RP	2RP-3179
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? The release was greater than 25 bbls.
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? Yes, by Tony Savoie to Mike Bratcher/Heather Patterson (NMOCD), and Jim Amos (BLM) on 7/29/2015.	

Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
If all the actions described above have <u>not</u> been undertaken, explain why: _____ _____ _____
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.
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.
Printed Name: <u>Kyle Littrell</u> Title: <u>SH&E Coordinator</u> Signature:  Date: <u>4/12/2019</u> email: <u>Kyle.Littrell@xtoenergy.com</u> Telephone: <u>432-221-7331</u>
OCD Only Received by: _____ Date: _____

Incident ID	
District RP	2RP-3179
Facility ID	
Application ID	

Site Assessment/Characterization

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?	>150 (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: *Each of the following items must be included in the report.*

- Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- Field data
- Data table of soil contaminant concentration data
- Depth to water determination
- Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- Boring or excavation logs
- Photographs including date and GIS information
- Topographic/Aerial maps
- Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

State of New Mexico
Oil Conservation Division

Page 4

Incident ID	
District RP	2RP-3179
Facility ID	
Application ID	

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.

Printed Name: Kyle Littrell Title: SH&E Supervisor

Signature:  Date: 10/30/2019

email: Kyle_Littrell@xtoenergy.com Telephone: (432)-221-7331

OCD Only

Received by: _____ Date: _____

Incident ID	nAB1521257588
District RP	2RP-3179
Facility ID	
Application ID	

Remediation Plan

Remediation Plan Checklist: Each of the following items must be included in the plan.

- Detailed description of proposed remediation technique
- Scaled sitemap with GPS coordinates showing delineation points
- Estimated volume of material to be remediated
- Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: Each of the following items must be confirmed as part of any request for deferral of remediation.

- Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- Extents of contamination must be fully delineated.
- Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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.

Printed Name: Kyle Littrell Title: SH&E Supervisor

Signature:  Date: 10/30/2019

email: Kyle_Littrell@xtoenergy.com Telephone: (432)-221-7331

OCD Only

Received by: _____ Date: _____

- Approved Approved with Attached Conditions of Approval Denied Deferral Approved

Signature:  Date: 07/12/2021

NM OIL CONSERVATION
ARTESIA DISTRICT

DEC 22 2015

Form C-141
Revised August 8, 2011

District I
1625 N. French Dr., Hobbs, NM 88240;
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

RECEIVED
Submit 1 Copy to appropriate District Office in
accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

NAB1535754357 OPERATOR Initial Report Final Report

Name of Company: BOPCO, L.P. <i>1100737</i>	Contact: Amy Ruth
Address: 522 W. Mermod, Suite 704 Carlsbad, N.M. 88220	Telephone No. 575-887-7329
Facility Name: James Ranch Unit #10 Battery	Facility Type: Exploration and Production
Surface Owner: Federal	Mineral Owner: Federal
API No. 30-015-23075	

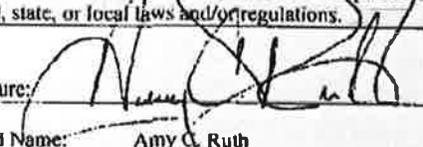
LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
H	1	23S	30E	1980	North	660	East	Eddy

Latitude 32.335560° Longitude -103.827584°

NATURE OF RELEASE

Type of Release	Produced Water	Volume of Release	81 bbls	Volume Recovered	40 bbls
Source of Release	Tank Overflow	Date and Hour of Occurrence	12/14/2015 time unknown	Date and Hour of Discovery	12/14/2015 11:15 am
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Mike Bratcher/Heather Patterson (NMOCD), Jim Amos (BLM)		
By Whom?	Amy Ruth	Date and Hour	12/14/2015 4:52 pm		
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	N/A		
If a Watercourse was Impacted, Describe Fully.* N/A					
Describe Cause of Problem and Remedial Action Taken.* Coupling on water transfer pump failed and pump shut down. Produced water tank filled and overflowed into the battery earthen containment. The pump was repaired.					
Describe Area Affected and Cleanup Action Taken.* The leak affected 1550 ft ² of well pad within the tank containment and standing fluids were recovered.					
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.					

Signature: 	OIL CONSERVATION DIVISION	
Printed Name: Amy C. Ruth	Approved by Environmental Specialist: 	
Title: Remediation Specialist	Approval Date: 12/23/15	Expiration Date: N/A
E-mail Address: AC.Ruth@basspet.com	Conditions of Approval: Remediation per O.C.D. Rules & Guidelines <input type="checkbox"/>	
Date: 12/22/2015 Phone: 432-661-0571	SUBMIT REMEDIATION PROPOSAL NO	

* Attach Additional Sheets If Necessary

LATER THAN: 1/24/16

2RP-3464

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural
Resources Department

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Incident ID	
District RP	2RP-3464
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party: XTO Energy, Inc	OGRID: 5380
Contact Name: Kyle Littrell	Contact Telephone: (432)-221-7331
Contact email: Kyle_Littrell@xtoenergy.com	Incident #: 2RP-3464
Contact mailing address 522 W. Mermod, Suite 704 Carlsbad, NM 88220	

Location of Release Source

Latitude 32.335560 Longitude -103.827584
(NAD 83 in decimal degrees to 5 decimal places)

Site Name James Ranch Unit #10 Battery	Site Type Exploration and Production
Date Release Discovered 12/14/15	API# (if applicable) 30-015-23075

Unit Letter	Section	Township	Range	County
H	1	23S	30E	Eddy

Surface Owner: State Federal Tribal Private (Name: BLM)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 81	Volume Recovered (bbls) 40
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

Coupling on water transfer pump failed and pump shut down. Produced water tank filled and overflowed into the battery earthen containment. The pump was repaired. The leak affected 1550 ft² of well pad within the tank containment and standing fluids were recovered. Fluids remained within the containment with exception of the southwest corner, though what little escaped remained on the well pad.

Form C-141

State of New Mexico
Oil Conservation Division

Page 2

Incident ID	
District RP	2RP-3464
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? The release was greater than 25 bbls.
---	---

If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?
 Yes, immediate notice was given by Amy Ruth to Mike Bratcher/ Heather Patterson (NMOCD), and Jim Amos (BLM) on 12/14/15.

Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
--

If all the actions described above have not been undertaken, explain why:

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

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.

Printed Name: Kyle Littrell Title: SH&E Coordinator
 Signature:  Date: 4/12/2019
 email: Kyle.Littrell@xtoenergy.com Telephone: 432-221-7331

OCD Only
 Received by: _____ Date: _____

Incident ID	
District RP	2RP-3464
Facility ID	
Application ID	

Site Assessment/Characterization

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?	>150 (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: *Each of the following items must be included in the report.*

- Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- Field data
- Data table of soil contaminant concentration data
- Depth to water determination
- Determination of water sources and significant watercourses within 1/2-mile of the lateral extents of the release
- Boring or excavation logs
- Photographs including date and GIS information
- Topographic/Aerial maps
- Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

State of New Mexico
Oil Conservation Division

Page 4

Incident ID	
District RP	2RP-3464
Facility ID	
Application ID	

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.

Printed Name: Kyle Littrell Title: SH&E Supervisor

Signature:  Date: 10/30/2019

email: Kyle_Littrell@xtoenergy.com Telephone: (432)-221-7331

OCD Only

Received by: _____ Date: _____

Incident ID	nAB1535754357
District RP	2RP-3464
Facility ID	
Application ID	

Remediation Plan

Remediation Plan Checklist: Each of the following items must be included in the plan.

- Detailed description of proposed remediation technique
- Scaled sitemap with GPS coordinates showing delineation points
- Estimated volume of material to be remediated
- Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: Each of the following items must be confirmed as part of any request for deferral of remediation.

- Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- Extents of contamination must be fully delineated.
- Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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.

Printed Name: Kyle Littrell Title: SH&E Supervisor

Signature:  Date: 10/30/2019

email: Kyle_Littrell@xtoenergy.com Telephone: (432)-221-7331

OCD Only

Received by: _____ Date: _____

- Approved Approved with Attached Conditions of Approval Denied Deferral Approved

Signature:  Date: 07/12/2021

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	NAB1904653072
District RP	2RP-5243
Facility ID	
Application ID	pAB1904652533

Release Notification

Responsible Party

Responsible Party: XTO Energy, Inc	OGRID: 5380
Contact Name: Kyle Littrell	Contact Telephone: (432)-221-7331
Contact email: Kyle_Littrell@xtoenergy.com	Incident #: 2RP-5243
Contact mailing address 522 W. Mermod, Suite 704 Carlsbad, NM 88220	

Location of Release Source

Latitude 32.335540 Longitude -103.827513
(NAD 83 in decimal degrees to 5 decimal places)

Site Name James Ranch Unit #10 Battery	Site Type Bulk Storage and Separation Facility
Date Release Discovered 01/29/19	API# (if applicable) 30-015-23075

Unit Letter	Section	Township	Range	County
H	1	23S	30E	Eddy

Surface Owner: State Federal Tribal Private (Name: BLM)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input checked="" type="checkbox"/> Crude Oil	Volume Released (bbls) 9.8	Volume Recovered (bbls) 7
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

Just prior to unloading the tanks by oil haulers, an overload of fluids enter the facility and overran the oil tank into the earthen berm. This was due to increased production efficiency by the lease operator and the subsequent unloading of the well into the facility. A vaccum truck recovered free standing fluids and the battery is being evaluated for upgrades. An environmental contractor has been retained to assist with remediation efforts.

Form C-141

State of New Mexico
Oil Conservation Division

Page 2

Incident ID	
District RP	2RP-5243
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
If all the actions described above have <u>not</u> been undertaken, explain why:
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.
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.
Printed Name: <u>Kyle Littrell</u> Title: <u>SH&E Coordinator</u> Signature:  Date: <u>4/12/2019</u> email: <u>Kyle.Littrell@xtoenergy.com</u> Telephone: <u>432-221-7331</u>
<p><u>OCD Only</u></p> Received by: _____ Date: _____

Incident ID	
District RP	2RP-5243
Facility ID	
Application ID	

Site Assessment/Characterization

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?	>150 (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: *Each of the following items must be included in the report.*

- Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- Field data
- Data table of soil contaminant concentration data
- Depth to water determination
- Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- Boring or excavation logs
- Photographs including date and GIS information
- Topographic/Aerial maps
- Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

Incident ID	nAB1904653072
District RP	2RP-5243
Facility ID	
Application ID	

Remediation Plan

Remediation Plan Checklist: Each of the following items must be included in the plan.

- Detailed description of proposed remediation technique
- Scaled sitemap with GPS coordinates showing delineation points
- Estimated volume of material to be remediated
- Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: Each of the following items must be confirmed as part of any request for deferral of remediation.

- Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- Extents of contamination must be fully delineated.
- Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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.

Printed Name: Kyle Littrell Title: SH&E Supervisor

Signature:  Date: 10/30/2019

email: Kyle_Littrell@xtoenergy.com Telephone: (432)-221-7331

OCD Only

Received by: _____ Date: _____

- Approved Approved with Attached Conditions of Approval Denied Deferral Approved

Signature:  Date: 07/12/2021

ATTACHMENT 2: LITHOLOGIC / SOIL SAMPLING LOGS



 LT Environmental, Inc. 508 West Stevens Street Carlsbad, New Mexico 88220 Compliance · Engineering · Remediation		Identifier: <i>SVE-PT01 (2019)</i>	Date: <i>9/18/19</i>					
		Project Name: <i>JRU10</i>	RP Number: <i>ZAP-3104</i> <i>ZAP-3179, ZAP-3104</i>					
LITHOLOGIC / SOIL SAMPLING LOG								
Lat/Long:		Field Screening: CHLORIDES, PID.	Logged By: <i>MM</i>					
		Hole Diameter: <i>6"</i>	Method: <i>Soil</i>					
			Total Depth: <i>45'</i>					
Comments:								
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Depth (ft. bgs.)	Sample Depth	Soil/Rock Type	Lithology/Remarks
<i>Moist</i>			<i>~</i>		26		SP-S	<p style="text-align: right;">well completely</p> <p>- Clasts size increase from 3mm - 2cm.</p> <p>30-45' CLAYSTONE, red-brown, dry, highly fractured, low plasticity, non-cohesive, no stain, w/ odor, well cemented.</p> <p>- TPC @ 45'</p>
		<i>5000</i>			27			
		<i>768</i>	<i>4566</i>		28			
					29			
		<i>5000</i>			30			
		<i>352</i>	<i>5000</i>		31		CL-S	
					32			
		<i>5000</i>			33			
					34			
		<i>5000</i>			35			
					36			
		<i>5000</i>			37			
					38			
		<i>5000</i>			39			
		<i>1278</i>	<i>5000</i>		40			
					41			
		<i>5000</i>			42			
					43			
		<i>1278</i>	<i>162.7</i>	<i>✓</i>	44			
					45			
					46		TD@45'	
					47			
					48			
					49			
					50			



LT Environmental, Inc.
 508 West Stevens Street
 Carlsbad, New Mexico 88220

Compliance · Engineering · Remediation

Identifier: **SVE-PT02**

Date: **8/18/19**

Project Name: **JRU 10**

RP Number: **2RP-3404, 2RP-3179, 2RP-3164**

LITHOLOGIC / SOIL SAMPLING LOG

Logged By: **WJA**

Method: **Soil.c**

Lat/Long:

Field Screening: CHLORIDES, PID.

Hole Diameter: **6"**

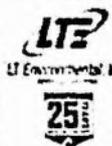
Total Depth: **30'**

Comments:

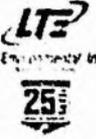
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Depth (ft. bgs.)	Sample Depth	Soil/Rock Type	Lithology/Remarks
dry	128	202	None		26		CL-S	28' - odor, broken drill pipe.
					27			
					28			
					29			
					30			
					31		TD @ 30'	
					32			
					33			
					34			
					35			
					36			
					37			
					38			
					39			
					40			
					41			
					42			
					43			
					44			
					45			
					46			
					47			
					48			
					49			
					50			

well completions

TP@ 30'

		LT Environmental, Inc. 508 West Stevens Street Carlsbad, New Mexico 88220 Compliance · Engineering · Remediation		Identifier: SUE-PT03 Date: 9/18/19				
Project Name: JRU-10		RP Number: 2RP-3179		Method: Soic				
Logged By: WM		Hole Diameter: 6in		Total Depth: 30ft				
LITHOLOGIC / SOIL SAMPLING LOG			Field Screening: PID, CI					
Comments: 10ft of screen								
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Depth (ft. bgs.)	Sample Depth	Soil/Rock Type	Lithology/Remarks
RCY			None		1		SW	0-4.5 Fine SAND, some gravel, trace clay
					2			Light B/Tan, dry, no stain, no odor
					3			- low Plasticity
					4			- non-cohesive
	980	1740			5			
					6			
					7			
		1747			8			- moist, darker color
					9			7.5-14.5 cobbles, increased gravel content
					10			(some to few)
	980	1531			11			
					12			
		3247			13			
					14			
	180	3783			15		SP	4.5-17 Fine Sand, red/brown, dry, no stain, no odor
					16			15-17 increasing cobbles & gravel (some to few)
					17			
					18		CL-S	17.5-30 Claystone, highly fractured, blocky, Rd/Br
		688.3			19			dry, no stain, odor
					20			- low Plasticity
	180	5000			21			- Non-cohesive
					22			
		4,178			23			
					24			
Y	129	5,000			25			

well completions stickup

 <p style="text-align: center;">LT Environmental, Inc. 508 West Stevens Street Carlsbad, New Mexico 88220 <i>Compliance · Engineering · Remediation</i></p>		Identifier: SVE-P103	Date: 9/18/19					
		Project Name: JRV-10	RP Number: 2RP-3179					
LITHOLOGIC / SOIL SAMPLING LOG								
Lat/Long:		Field Screening: PID, CI	Logged By: LM					
		Hole Diameter: 6in	Method: Sonic					
			Total Depth: 30ft					
Comments:								
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Depth (ft. bgs.)	Sample Depth	Soil/Rock Type	Lithology/Remarks
dry ↓		3832	NONE ↓		26			<div style="text-align: right; margin-bottom: 5px;"><i>well completions</i></div> 
	128	3872			27			
					28			
					29		CL-5	
					30			
					31			
					32			
					33			
					34			
					35			
					36			
					37			
					38			
					39			
					40			
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					47			
					48			
					49			
					50			

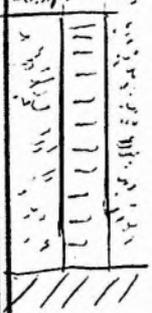
 LT Environmental, Inc. 508 West Stevens Street Carlsbad, New Mexico 88220 Compliance · Engineering · Remediation		Identifier: 'SUE-PT04	Date: 9/12/19					
		Project Name: JRU #10	RP Number: 2RP-3179					
LITHOLOGIC / SOIL SAMPLING LOG								
Logged By: <i>JE</i>		Method: <i>Sonic</i>						
Field Screening: PID / Chloride Strips		Hole Diameter: 6"						
Total Depth: 30'								
Comments: Set well with 2" PVC, 15' screen, sand 1' over screen, bentonite to surface								
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Depth (ft. bgs.)	Sample Depth	Soil/Rock Type	Lithology/Remarks
					1			0-4' Hand auger, not logged
					2			
					3			
					4			
Dry	<128	170.4	None		5		SW	4-19 Fine to medium sand with gravel, some cobbles, light brown, dry, no stain, odor - 6" of stain at 8.5' - Stain from 15' - 19'
					6			
					7			
					8			
					9			
					10			
					11			
					12			
					13			
					14			
					15		SW	19-25 Clayey fine to medium grained sand with gravel, some cobbles, dark brown, moist, non cohesive, low plasticity, odor, no stain - Dry at 22.5
					16			
					17			
					18			
					19			
					20			
					21			
					22			
					23			
					24			
					25			

well completions sketch



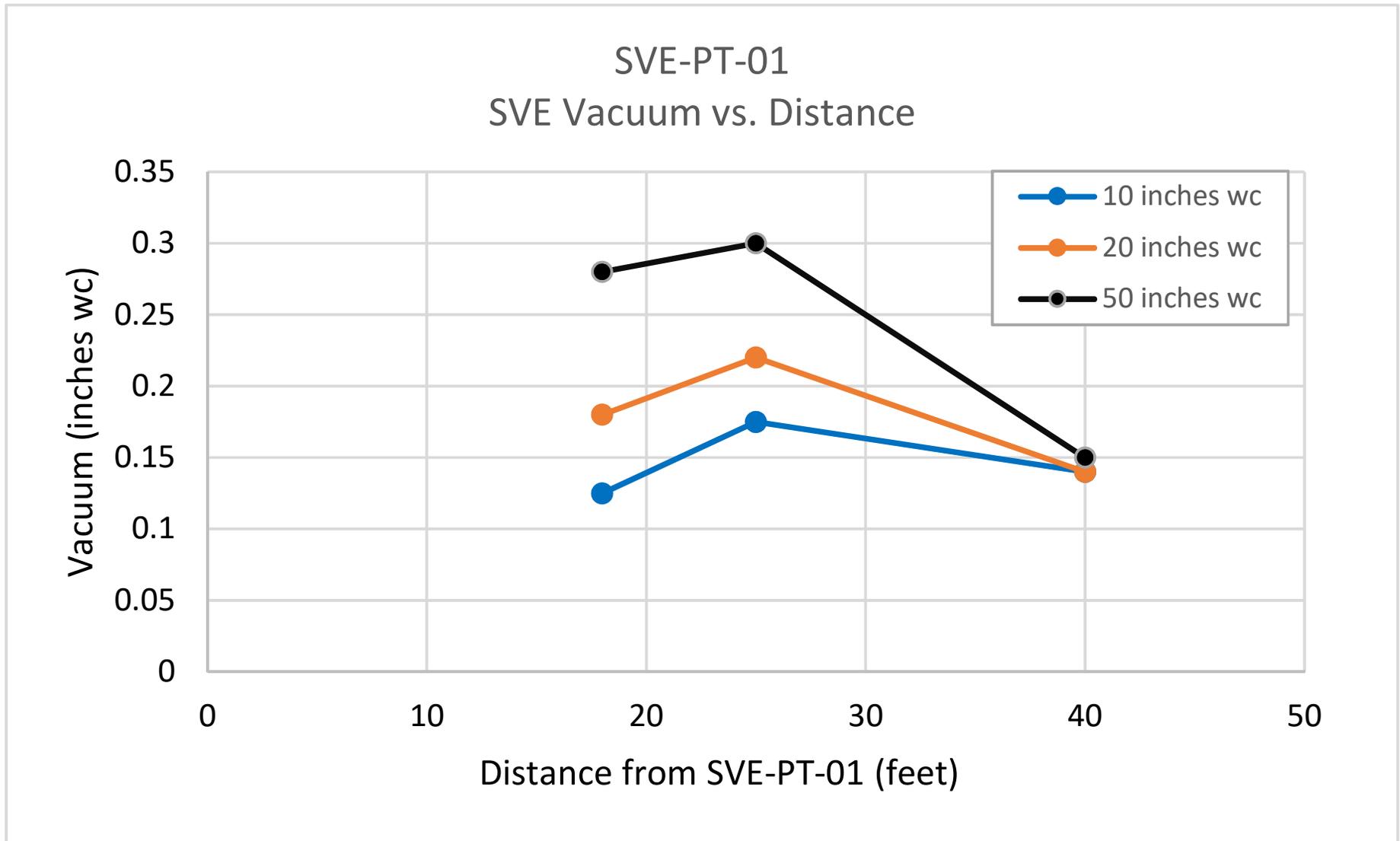
 <p style="text-align: center;">LT Environmental, Inc. 508 West Stevens Street Carlsbad, New Mexico 88220 Compliance · Engineering · Remediation</p>		Identifier: SUE-PT04	Date: 9/18/19					
		Project Name: JRU #10	RP Number: 2RP-3179					
LITHOLOGIC / SOIL SAMPLING LOG								
Lat/Long:		Field Screening: PID/Chloride Strip	Logged By: JE					
		Hole Diameter: 6"	Method: Series					
			Total Depth: 30'					
Comments:								
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Depth (ft. bgs.)	Sample Depth	Soil/Rock Type	Lithology/Remarks
Dry			N/C		26		CLS	25-30 Claystone, highly fractured, blocky, red/brown, dry, low plasticity, non cohesive
					27			
		500			28			
					29			
	818	500			30			
					31			
					32			
					33			
					34			
					35			
					36			
					37			
					38			
					39			
					40			
					41			
					42			
					43			
					44			
					45			
					46			
					47			
					48			
					49			
					50			

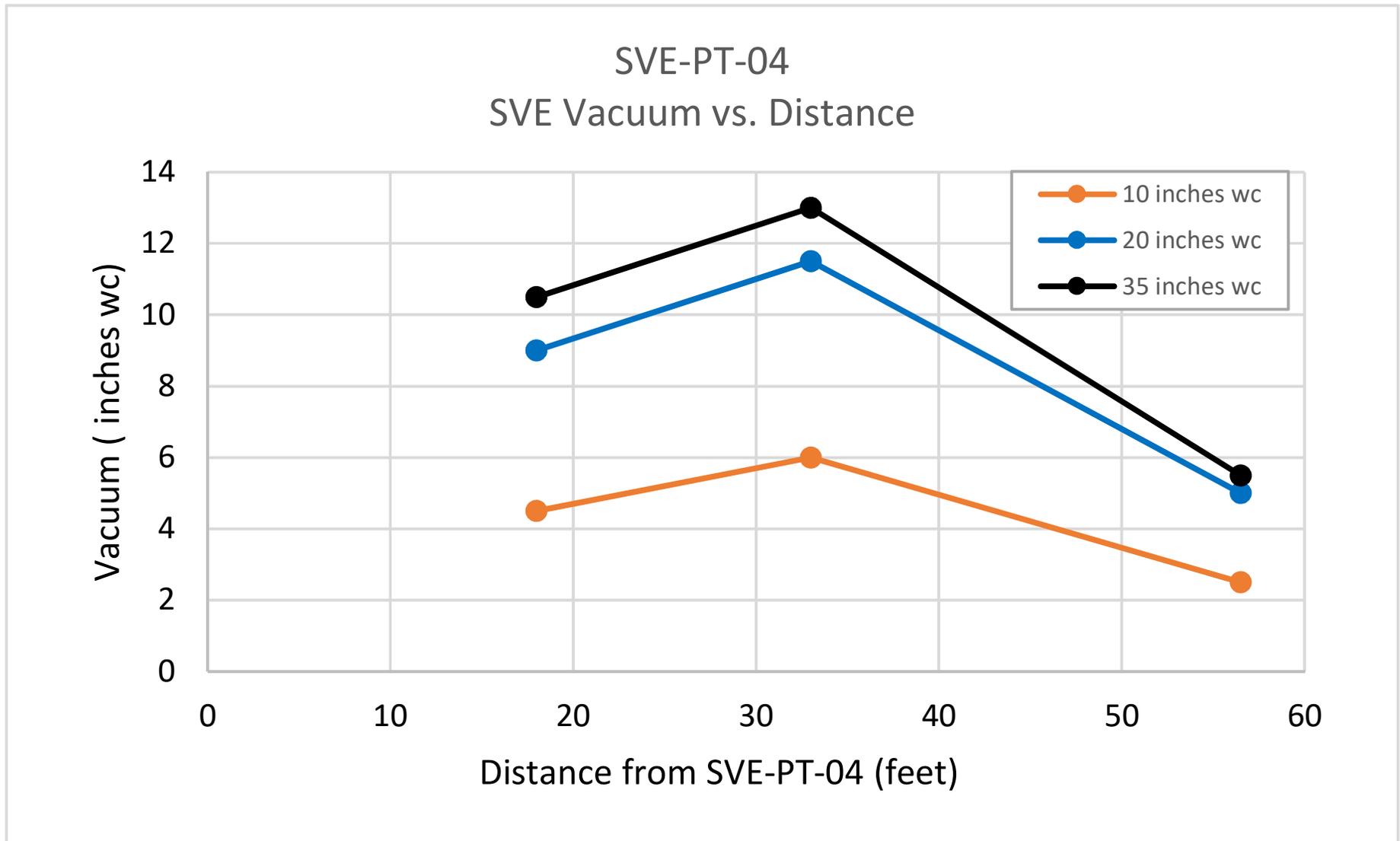
Well Completions



ATTACHMENT 3: PILOT TEST DATA







ATTACHMENT 4: LABORATORY ANALYTICAL REPORT



Analytical Report 638711

for
LT Environmental, Inc.

Project Manager: Dan Moir

JRU 10 Tank Battery

012918003

07-OCT-19

Collected By: Client



**1089 N Canal Street
Carlsbad, NM 88220**

Xenco-Houston (EPA Lab Code: TX00122):
Texas (T104704215-19-30), Arizona (AZ0765), Florida (E871002-24), Louisiana (03054)
Oklahoma (2017-142), North Carolina (681)

Xenco-Dallas (EPA Lab Code: TX01468):
Texas (TX104704295-19-22), Arizona (AZ0809), Arkansas (17-063-0)

Xenco-El Paso (EPA Lab Code: TX00127): Texas (T104704221-19-16)
Xenco-Lubbock (EPA Lab Code: TX00139): Texas (T104704219-19-21)
Xenco-Midland (EPA Lab Code: TX00158): Texas (T104704400-19-19)
Xenco-San Antonio (EPA Lab Code: TNI02385): Texas (T104704534-19-5)
Xenco Phoenix (EPA Lab Code: AZ00901): Arizona (AZ0757)
Xenco-Tampa: Florida (E87429), North Carolina (483)



07-OCT-19

Project Manager: **Dan Moir**

LT Environmental, Inc.

4600 W. 60th Avenue

Arvada, CO 80003

Reference: XENCO Report No(s): **638711**

JRU 10 Tank Battery

Project Address: Rural Eddy County

Dan Moir:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number(s) 638711. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. The uncertainty of measurement associated with the results of analysis reported is available upon request. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 638711 will be filed for 45 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

A handwritten signature in black ink that reads 'Jessica Kramer'.

Jessica Kramer

Project Assistant

Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.

Certified and approved by numerous States and Agencies.

A Small Business and Minority Status Company that delivers SERVICE and QUALITY

Houston - Dallas - Midland - San Antonio - Phoenix - Oklahoma - Latin America



Sample Cross Reference 638711

LT Environmental, Inc., Arvada, CO

JRU 10 Tank Battery

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
SVE-PT-04	A	10-01-19 14:50		638711-001



CASE NARRATIVE

Client Name: LT Environmental, Inc.

Project Name: JRU 10 Tank Battery

Project ID: 012918003
Work Order Number(s): 638711

Report Date: 07-OCT-19
Date Received: 10/02/2019

Sample receipt non conformances and comments:

None

Sample receipt non conformances and comments per sample:

None



Certificate of Analysis Summary 638711

LT Environmental, Inc., Arvada, CO

Project Name: JRU 10 Tank Battery

Project Id: 012918003
Contact: Dan Moir
Project Location: Rural Eddy County

Date Received in Lab: Wed Oct-02-19 08:35 am
Report Date: 07-OCT-19
Project Manager: Jessica Kramer

Analysis Requested	Lab Id:	638711-001				
	Field Id:	SVE-PT-04				
	Depth:					
	Matrix:	AIR				
	Sampled:	Oct-01-19 14:50				
BTEX by EPA 8021B SUB: T104704295-19-22	Extracted:	Oct-04-19 11:00				
	Analyzed:	Oct-04-19 14:00				
	Units/RL:	ppmv RL				
	Benzene	22.6 + 3.13				
	Toluene	98.3 + 2.65				
	Ethylbenzene	4.79 + 2.30				
	m,p-Xylenes	98.2 + 4.61				
o-Xylene	15.6 + 2.30					
Total Xylenes	114 + 2.30					
Total BTEX	239 + 2.30					
TPH GRO by EPA 8015 Mod. SUB: T104704295-19-22	Extracted:	Oct-04-19 11:00				
	Analyzed:	Oct-04-19 14:00				
	Units/RL:	ppmv RL				
TPH-GRO	5170 + 128					

This analytical report, and the entire data package it represents, has been made for your exclusive and confidential use. The interpretations and results expressed throughout this analytical report represent the best judgment of XENCO Laboratories. XENCO Laboratories assumes no responsibility and makes no warranty to the end use of the data hereby presented. Our liability is limited to the amount invoiced for this work order unless otherwise agreed to in writing.

Houston - Dallas - Midland - Tampa - Phoenix - Lubbock - San Antonio - El Paso - Atlanta - New Mexico

Jessica Kramer
Project Assistant



Certificate of Analytical Results 638711

LT Environmental, Inc., Arvada, CO

JRU 10 Tank Battery

Sample Id: **SVE-PT-04** Matrix: Air Date Received: 10.02.19 08.35
 Lab Sample Id: 638711-001 Date Collected: 10.01.19 14.50
 Analytical Method: BTEX by EPA 8021B Prep Method: SW5030B
 Tech: AKC % Moisture:
 Analyst: AKC Date Prep: 10.04.19 11.00
 Seq Number: 3103365 SUB: T104704295-19-22

Parameter	Cas Number	Result mg/m3	RL mg/m3	Result ppmv	RL ppmv	Analysis Date	Flag	Dil
Benzene	71-43-2	72.2	10.0	22.6	3.13	10.04.19 14.00	+	10
Toluene	108-88-3	370	9.98	98.3	2.65	10.04.19 14.00	+	10
Ethylbenzene	100-41-4	20.8	9.98	4.79	2.30	10.04.19 14.00	+	10
m,p-Xylenes	179601-23-1	426	20.0	98.2	4.61	10.04.19 14.00	+	10
o-Xylene	95-47-6	67.7	9.98	15.6	2.30	10.04.19 14.00	+	10
Total Xylenes	1330-20-7	494	9.98	114	2.30	10.04.19 14.00	+	10
Total BTEX		957	9.98	239	2.30	10.04.19 14.00	+	10

Surrogate	% Recovery	Units	Limits	Analysis Date	Flag
4-Bromofluorobenzene	95	%	70-135	10.04.19 14.00	

Analytical Method: TPH GRO by EPA 8015 Mod. Prep Method: SW5030B
 Tech: AKC % Moisture:
 Analyst: AKC Date Prep: 10.04.19 11.00
 Seq Number: 3103363 SUB: T104704295-19-22

Parameter	Cas Number	Result mg/m3	RL mg/m3	Result ppmv	RL ppmv	Analysis Date	Flag	Dil
TPH-GRO	8006-61-9	20200	501	5170	128	10.04.19 14.00	+	10

Surrogate	% Recovery	Units	Limits	Analysis Date	Flag
4-Bromofluorobenzene	95	%	60-140	10.04.19 14.00	



LT Environmental, Inc.

JRU 10 Tank Battery

Analytical Method: BTEX by EPA 8021B

Seq Number: 3103365

MB Sample Id: 7687502-1-BLK

Matrix: Air

LCS Sample Id: 7687502-1-BKS

Prep Method: SW5030B

Date Prep: 10.04.19

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	Limits	Units	Analysis Date	Flag
Benzene	<0.313	31.3	29.2	93	70-125	ppmv	10.04.19 11:57	
Toluene	<0.133	26.5	22.8	86	70-125	ppmv	10.04.19 11:57	
Ethylbenzene	<0.115	23.0	19.7	86	70-125	ppmv	10.04.19 11:57	
m,p-Xylenes	<0.230	46.1	40.4	88	70-125	ppmv	10.04.19 11:57	
o-Xylene	<0.115	23.0	19.2	83	70-125	ppmv	10.04.19 11:57	

Surrogate	MB %Rec	MB Flag	LCS %Rec	LCS Flag	Limits	Units	Analysis Date
4-Bromofluorobenzene	100		104		70-135	%	10.04.19 11:57

Analytical Method: BTEX by EPA 8021B

Seq Number: 3103365

Parent Sample Id: 638711-001

Matrix: Air

MD Sample Id: 638711-001 D

Prep Method: SW5030B

Date Prep: 10.04.19

Parameter	Parent Result	MD Result	%RPD	RPD Limit	Units	Analysis Date	Flag
Benzene	22.6	27.2	18	35	ppmv	10.04.19 14:13	
Toluene	98.3	117	17	35	ppmv	10.04.19 14:13	
Ethylbenzene	4.79	5.37	11	35	ppmv	10.04.19 14:13	
m,p-Xylenes	98.2	119	19	35	ppmv	10.04.19 14:13	
o-Xylene	15.6	19.5	22	35	ppmv	10.04.19 14:13	
Total Xylenes	114	139	NC	35	ppmv	10.04.19 14:13	
Total BTEX	239	288	NC	35	ppmv	10.04.19 14:13	

Analytical Method: TPH GRO by EPA 8015 Mod.

Seq Number: 3103363

MB Sample Id: 7687498-1-BLK

Matrix: Air

LCS Sample Id: 7687498-1-BKS

Prep Method: SW5030B

Date Prep: 10.04.19

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	Limits	Units	Analysis Date	Flag
TPH-GRO	<6.39	179	168	94	65-115	ppmv	10.04.19 11:57	

Surrogate	MB %Rec	MB Flag	LCS %Rec	LCS Flag	Limits	Units	Analysis Date
4-Bromofluorobenzene	100		104		60-140	%	10.04.19 11:57

Analytical Method: TPH GRO by EPA 8015 Mod.

Seq Number: 3103363

Parent Sample Id: 638711-001

Matrix: Air

MD Sample Id: 638711-001 D

Prep Method: SW5030B

Date Prep: 10.04.19

Parameter	Parent Result	MD Result	%RPD	RPD Limit	Units	Analysis Date	Flag
TPH-GRO	5170	5570	7	35	ppmv	10.04.19 14:13	

MS/MSD Percent Recovery
Relative Percent Difference
LCS/LCSD Recovery
Log Difference

[D] = 100*(C-A) / B
RPD = 200* |(C-E) / (C+E)|
[D] = 100 * (C) / [B]
Log Diff. = Log(Sample Duplicate) - Log(Original Sample)

LCS = Laboratory Control Sample
A = Parent Result
C = MS/LCS Result
E = MSD/LCSD Result

MS = Matrix Spike
B = Spike Added
D = MSD/LCSD % Rec



Setting the Standard since 1990

AIR SAMPLING CHAIN OF CUSTODY

Stafford, Texas (281-240-4200)
Dallas, Texas (214-902-0300)

San Antonio, Texas (210-509-3334)
Lubbock, TX (806-794-1296)

Phoenix, Arizona (480-355-0900)
Midland, TX (432-704-5251)

El Paso, TX (915-585-3443)

Xenco Job #: 038710
038711

Client/Project Information

Company Name: XTO Energy Contact: Kyle Littrell Email: klittrell@xtoenergy.com
 Project Contact: Dan Moir Company: LT Environmental, Inc
 Email: dmoir@ltenv.com Ph.No.: (432) 238-4292
 Project Name & No.: JRU 10 Tank Battery , 012918003
 Site Location: Rural Eddy County, NM
 P.O. No.: Task#002
 Sampler(s): Lynda Laumbach

AIR TYPE

I = Indoor SV = Soil Vapor
A = Ambient

Sampling Equipment Information

Canister ID:
 Flow Regulator ID:
 Canister Pressure in field ("Hg) Start:
 Canister Pressure in field ("Hg) Stop:
 Incoming Canister Pressure ("Hg) Lab:
 Analysis Requested: BTEX, TVPH

Page 1 of 1

Lab #	Field ID/Point of Collection	Start Date	Start Time	Stop Date	Stop Time	Remarks
1	SVE-PT-04	10/01/2019	14:40	10/01/2019	14:50	SV

(1) Relinquished By: [Signature] Date/Time: 10/2/2019 08:35
 (2) Relinquished By: [Signature] Date/Time: 10/2/2019 08:35
 (3) Relinquished By: [Signature] Date/Time:
 (4) Relinquished By: [Signature] Date/Time:
 (1) Received By: [Signature] Date/Time:
 (2) Received By: [Signature] Date/Time:
 (3) Received By: [Signature] Date/Time:
 (4) Received By: [Signature] Date/Time:

Requested TAT:
 Contract TAT 3 Day Same Day
 7 Day 2 Day Need By:
 5 Day 1 Day

Shipping Information:
 FedEx Other:
 UPS Tracking No.:
 LSO



Inter-Office Shipment

IOS Number 49169

Date/Time: 10/02/19 11:52

Created by: Elizabeth McClellan

Please send report to: Jessica Kramer

Lab# From: **Carlsbad**

Delivery Priority:

Address: 1089 N Canal Street

Lab# To: **Dallas**

Air Bill No.:

E-Mail: jessica.kramer@xenco.com

Sample Id	Matrix	Client Sample Id	Sample Collection	Method	Method Name	Lab Due	HT Due	PM	Analytes	Sign
638711-001	A	SVE-PT-04	10/01/19 14:50	SW8015GRO	TPH GRO by EPA 8015 Mod.	10/08/19	10/04/19 14:50	JKR	PHCG	
638711-001	A	SVE-PT-04	10/01/19 14:50	SW8021B	BTEX by EPA 8021B	10/08/19	10/15/19	JKR	BR4FBZ BZ BZME EBZ X	

Inter Office Shipment or Sample Comments:

Relinquished By:

Elizabeth McClellan

Date Relinquished: 10/02/2019

Received By:

Whitney Capps

Date Received: 10/03/2019 09:23

Cooler Temperature: 22.8



XENCO Laboratories

Inter Office Report- Sample Receipt Checklist

Sent To: Dallas

IOS #: 49169

Acceptable Temperature Range: 0 - 6 degC
Air and Metal samples Acceptable Range: Ambient
Temperature Measuring device used : XDA

Sent By: Elizabeth McClellan

Date Sent: 10/02/2019 11:52 AM

Received By: Whitney Capps

Date Received: 10/03/2019 09:23 AM

Sample Receipt Checklist

Comments

- #1 *Temperature of cooler(s)? 22.8
- #2 *Shipping container in good condition? Yes
- #3 *Samples received with appropriate temperature? Yes
- #4 *Custody Seals intact on shipping container/ cooler? No
- #5 *Custody Seals Signed and dated for Containers/coolers N/A
- #6 *IOS present? Yes
- #7 Any missing/extra samples? No
- #8 IOS agrees with sample label(s)/matrix? Yes
- #9 Sample matrix/ properties agree with IOS? Yes
- #10 Samples in proper container/ bottle? Yes
- #11 Samples properly preserved? Yes
- #12 Sample container(s) intact? Yes
- #13 Sufficient sample amount for indicated test(s)? Yes
- #14 All samples received within hold time? Yes

* Must be completed for after-hours delivery of samples prior to placing in the refrigerator

NonConformance:

Corrective Action Taken:

Nonconformance Documentation

Contact: _____ Contacted by : _____ Date: _____

Checklist reviewed by:

Whitney Capps
Whitney Capps

Date: 10/03/2019



XENCO Laboratories Prelogin/Nonconformance Report- Sample Log-In

Client: LT Environmental, Inc.

Date/ Time Received: 10/02/2019 08:35:00 AM

Work Order #: 638711

Acceptable Temperature Range: 0 - 6 degC
Air and Metal samples Acceptable Range: Ambient
Temperature Measuring device used : T-NM-007

Sample Receipt Checklist		Comments
#1 *Temperature of cooler(s)?	20	
#2 *Shipping container in good condition?	Yes	
#3 *Samples received on ice?	Yes	
#4 *Custody Seals intact on shipping container/ cooler?	Yes	
#5 Custody Seals intact on sample bottles?	Yes	
#6*Custody Seals Signed and dated?	Yes	
#7 *Chain of Custody present?	Yes	
#8 Any missing/extra samples?	No	
#9 Chain of Custody signed when relinquished/ received?	Yes	
#10 Chain of Custody agrees with sample labels/matrix?	Yes	
#11 Container label(s) legible and intact?	Yes	
#12 Samples in proper container/ bottle?	Yes	
#13 Samples properly preserved?	Yes	
#14 Sample container(s) intact?	Yes	
#15 Sufficient sample amount for indicated test(s)?	Yes	
#16 All samples received within hold time?	Yes	
#17 Subcontract of sample(s)?	Yes	Subbed to Dallas
#18 Water VOC samples have zero headspace?	N/A	

* Must be completed for after-hours delivery of samples prior to placing in the refrigerator

Analyst:

PH Device/Lot#:

Checklist completed by:

Elizabeth McClellan

Date: 10/02/2019

Checklist reviewed by:

Jessica Kramer

Date: 10/04/2019

District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720
District II
 811 S. First St., Artesia, NM 88210
 Phone:(575) 748-1283 Fax:(575) 748-9720
District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
 1220 S. St Francis Dr., Santa Fe, NM 87505
 Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS
 Action 2175

CONDITIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 2175
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
bbillings	SVE approach is approved. In future, each individual incident number must be attached to separate report on portal, although the report can be identical to the other associated incidents at this location	7/12/2021