



December 9, 2024

New Mexico Oil Conservation Division

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

**Re: Closure Request
PLU Phantom Banks 20-25-31 USA Battery
Incident Numbers nAPP2330047859 and nAPP2425735479
Eddy County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of XTO Energy, Inc (XTO), has prepared this *Closure Request* to document the findings of a liner integrity inspection conducted at the PLU Phantom Banks 20-25-31 USA Battery (Site) following two releases of produced water within a lined containment. Based on the liner integrity inspection activities, XTO is submitting this *Closure Request*, describing assessment activities that have occurred and requesting no further action and closure for Incident Numbers nAPP2330047859 and nAPP2425735479.

SITE DESCRIPTION AND RELEASE SUMMARY

The Site is located in Unit D, Section 20, Township 25 South, Range 31 East, in Eddy County, New Mexico (32.12309°, -103.80629°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM).

On October 13, 2023, equipment failure on a pump resulted in the release of approximately 10 barrels (bbls) of produced water into a lined containment. A vacuum truck was dispatched to the Site to recover free-standing fluid, and all released fluid was recovered. Following the release, the pump was repaired. XTO reported the release to the New Mexico Oil Conservation Division (NMOCD) via a Notification of Release (NOR) and an Initial Release C-141 Form (C-141) on October 27, 2023. The release was assigned Incident Number nAPP2330047859.

On October 27, 2023, XTO submitted a *Closure Request* to the NMOCD for Incident Number nAPP2330047859. The NMOCD denied the *Closure Request* March 1, 2024, for the following reasons:

The closure report is denied. Before the liner inspection is conducted, the liner should be power washed. All dried mud, trash, chloride remnants, hydrocarbons, and brush should be removed so that the surface of the liner can be inspected. Please make sure this is accomplished before any liner inspection is submitted in the future.

On September 11, 2024, corrosion on a flowline resulted in the release of approximately 15 bbls of produced water into the same lined containment. A vacuum truck was dispatched to the Site to recover free-standing fluid, and all released fluid was recovered. Following the release, the flowline was repaired. XTO reported the release to the NMOCD via a NOR and a C-141 submitted on September 13, 2024. The release was assigned Incident Number nAPP2425735479.

XTO Energy, Inc
Closure Request
PLU Phantom Banks 20-25-31 USA Battery

SITE CHARACTERIZATION AND CLOSURE CRITERIA

The Site was characterized to assess the applicability of Table I Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29 (19.15.29) of the New Mexico Administrative Code (NMAC). Results from the characterization desktop review are presented below and potential Site receptors are identified on Figure 1.

Depth to groundwater at the Site is greater than 100 feet below ground surface (bgs) based on a recent soil boring drilled for determination of regional groundwater depth. On June 22, 2022, a soil boring (C-4624) was drilled approximately 1.6 miles southwest of the Site utilizing air rotary. Soil boring C-4624 was drilled to a depth of 120 feet bgs. A field geologist logged and described soils continuously. No moisture or groundwater was encountered during drilling activities. The borehole was left open for over 72 hours to allow for potential slow infill of groundwater. After the 72-hour waiting period without observing groundwater, it was confirmed that groundwater beneath the Site is greater than 120 feet bgs. The borehole was properly abandoned with drill cuttings and hydrated bentonite chips. The Well Record and Log is included in Appendix A.

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

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

LINER INTEGRITY INSPECTION ACTIVITIES

A 48-hour advance notice of the liner inspection was submitted to NMOCD for both Incidents. Prior to September 26, 2024, the lined containment was cleaned of all debris and power washed. On September 26, 2024, the liner was re-inspected by Ensolum personnel and was determined to be operating as designed. Upon inspection, no rips, tears, holes, or damage were observed. The liner was determined to be sufficient, and all released fluids were recovered. A Site Map is included in Figure 2. Photographic documentation of the inspection is included in Appendix B. The October 2023 *Closure Request* is provided in Appendix C.

CLOSURE REQUEST

Liner integrity inspection activities were conducted following two releases of produced water within a lined containment at the Site. Following removal of all fluids and debris, a liner integrity inspection was conducted by Ensolum personnel on September 26, 2024. Upon inspection, no rips, tears, holes, or damage were observed, and the liner was determined to be operating as designed. The release was contained laterally by the lined containment walls. Based on initial response efforts and the liner operating as designed, XTO respectfully requests closure for Incident Numbers nAPP2330047859 and nAPP2425735479.

XTO Energy, Inc
Closure Request
PLU Phantom Banks 20-25-31 USA Battery

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

Sincerely,
Ensolum, LLC

Kim Thomason

Kim Thomason
Senior Technician

T Morrissey

Tacoma Morrissey
Associate Principal

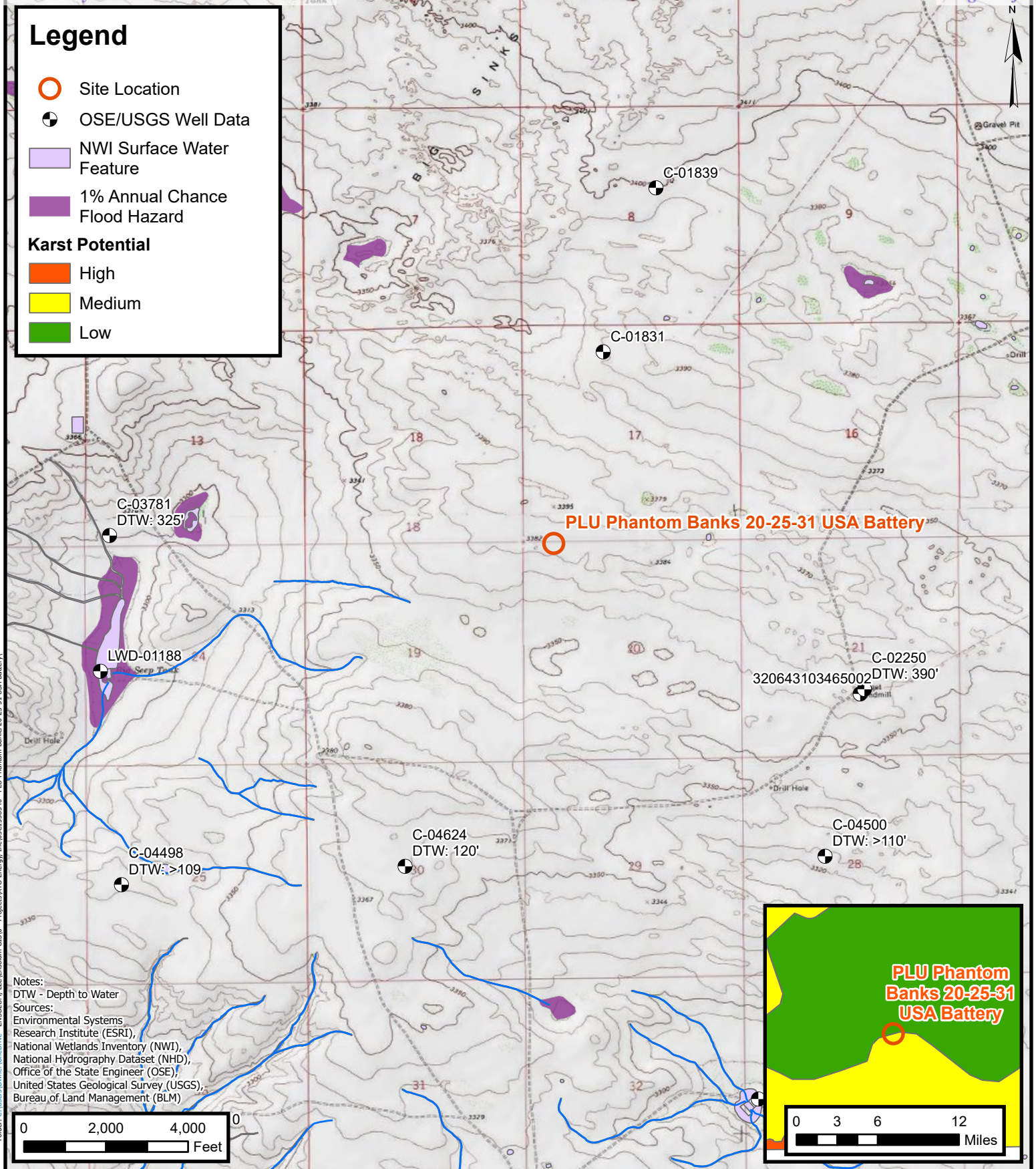
Cc: Colton Brown, XTO
Kaylan Dirkx, XTO
BLM

Appendices:

| | |
|------------|---------------------------------------|
| Figure 1 | Site Receptor Map |
| Figure 2 | Lined Containment Area |
| Appendix A | Referenced Well Records |
| Appendix B | Photographic Log |
| Appendix C | October 2023 - <i>Closure Request</i> |



FIGURES



Site Receptor Map

XTO Energy, Inc.
PLU Phantom Banks 20-25-31 USA Battery
Incident Number: nAPP2330047859 and nAPP2425735479
Unit D, Sec 20, T25W, R31N
Eddy County, New Mexico

FIGURE

1



Lined Containment Area
XTO Energy, Inc.
PLU Phantom Banks 20-25-31 USA Battery
Incident Number: nAPP2330047859 and nAPP2425735479
Unit D, Sec 20, T25W, R31N
Eddy County, New Mexico

FIGURE
2



APPENDIX A

Referenced Well Records



WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

www.ose.state.nm.us

| | | | | | | | | |
|--|---|----------------------------|---|---|---|--|--------------------------------------|--------------------------|
| 1. GENERAL AND WELL LOCATION | OSE POD NO. (WELL NO.) C-4624 POD 1 | | WELL TAG ID NO. | | OSE FILE NO(S). C-4624 | | | |
| | WELL OWNER NAME(S) XTO ENERGY INC | | | | PHONE (OPTIONAL) 432-236-3808 | | | |
| | WELL OWNER MAILING ADDRESS 6401 HOLIDAY HILL ROAD | | | | CITY MIDLAND | STATE TX | ZIP 79707 | |
| | WELL LOCATION (FROM GPS) | DEGREES LATITUDE 32 | MINUTES 6 | SECONDS 5.66 N | * ACCURACY REQUIRED: ONE TENTH OF A SECOND | | | |
| | | LONGITUDE -103 | 49 | 5.79 W | * DATUM REQUIRED: WGS 84 | | | |
| DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS - PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE ON POKER LAKE UNIT 30 BS # 103H PAD | | | | | | | | |
| 2. DRILLING & CASING INFORMATION | LICENSE NO. WD-1184 | | NAME OF LICENSED DRILLER RUSSELL SOUTHERLAND | | | NAME OF WELL DRILLING COMPANY WEST TEXAS WATER WELL SERVICE | | |
| | DRILLING STARTED 06/22/22 | DRILLING ENDED 06/22/22 | DEPTH OF COMPLETED WELL (FT) 120 | BORE HOLE DEPTH (FT) | DEPTH WATER FIRST ENCOUNTERED (FT) | | | |
| | COMPLETED WELL IS: <input type="checkbox"/> ARTESIAN <input checked="" type="checkbox"/> DRY HOLE <input type="checkbox"/> SHALLOW (UNCONFINED) | | | | STATIC WATER LEVEL IN COMPLETED WELL (FT) N/A | | | |
| | DRILLING FLUID: <input checked="" type="checkbox"/> AIR <input type="checkbox"/> MUD ADDITIVES - SPECIFY: | | | | | | | |
| | DRILLING METHOD: <input checked="" type="checkbox"/> ROTARY <input type="checkbox"/> HAMMER <input type="checkbox"/> CABLE TOOL <input type="checkbox"/> OTHER - SPECIFY: | | | | | | | |
| | DEPTH (feet bgl) FROM TO | | BORE HOLE DIAM. (inches) | CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen) | CASING CONNECTION TYPE (add coupling diameter) | CASING INSIDE DIAM. (inches) | CASING WALL THICKNESS (inches) | SLOT SIZE (inches) |
| | | | | NO CASING IN HOLE | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| 3. ANNULAR MATERIAL | DEPTH (feet bgl) FROM TO | | BORE HOLE DIAM. (inches) | LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL | AMOUNT (cubic feet) | METHOD OF PLACEMENT | | |
| | | | | N/A | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

FOR OSE INTERNAL USE

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

| | | |
|---------------------------|-------------------|----------------|
| FILE NO. C-4624-POD1 | POD NO. POD1 | TRN NO. 726169 |
| LOCATION 25S.31E.30.4.4.1 | WELL TAG ID NO. — | PAGE 1 OF 2 |

4. HYDROGEOLOGIC LOG OF WELL

FOR OSE INTERNAL USE



APPENDIX B

Photographic Log



Photographic Log

XTO Energy, Inc

PLU Phantom Banks 20-25-31 USA Battery

Incident Numbers: nAPP2330047859 & nAPP2425735479



Photograph: 1
Description: Well Sign
View: Southeast

Date: 9/26/2024



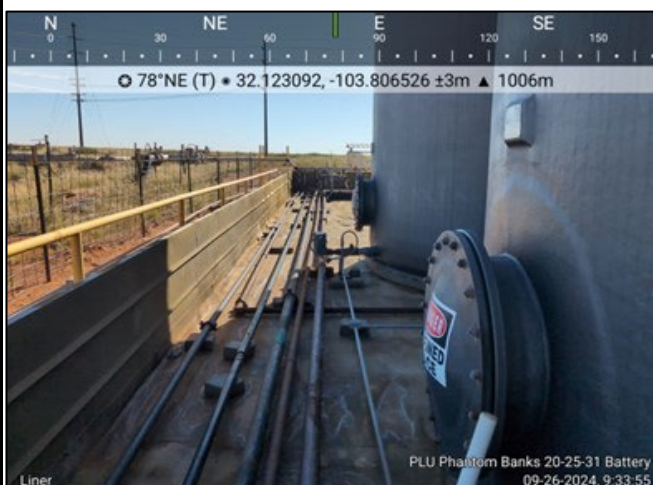
Photograph: 2
Description: Liner inspection activities
View: West

Date: 9/26/2024



Photograph: 3
Description: Liner inspection activities
View: South

Date: 9/26/2024



Photograph: 4
Description: Liner inspection activities
View: East

Date: 9/26/2024



APPENDIX C

October 2023 - Closure Request

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 | nAPP2330047859 |
| District RP | |
| Facility ID | |
| Application ID | |

Release Notification

Responsible Party

| | | | |
|-------------------------|--|-------------------|-------------------|
| Responsible Party | XTO Energy | OGRID | 5380 |
| Contact Name | Garrett Green | Contact Telephone | 575-200-0729 |
| Contact email | garrett.green@exxonmobil.com | Incident # | (assigned by OCD) |
| Contact mailing address | 3104 E. Greene Street, Carlsbad, New Mexico, 88220 | | |

Location of Release Source

Latitude32.12309Longitude-103.80629

(NAD 83 in decimal degrees to 5 decimal places)

| | | | |
|-------------------------|-------------------------------|-----------|----------------------|
| Site Name | PLU Phantom Bank 20-25-31 CTB | Site Type | Central Tank Battery |
| Date Release Discovered | 10/13/2023 | API# | (if applicable) |

| | | | | |
|-------------|---------|----------|-------|--------|
| Unit Letter | Section | Township | Range | County |
| D | 20 | 25S | 31E | Eddy |

Surface Owner: ☐ State ☒ Federal ☐ Tribal ☐ Private (Name:)

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) 10.00 | Volume Recovered (bbls) 10.00 |
| | Is the concentration of total dissolved solids (TDS) in the produced water >10,000 mg/l? | <input checked="" 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 ReleaseA seal failure on the SWD pump caused fluids to release to impermeable containment. All fluids were recovered. A 48-hour advance liner inspection notice was sent to NMOCD District 2. Liner was inspection and determined to be operating as designed. XTO requests closure of this incident.

| | |
|----------------|----------------|
| Incident ID | nAPP2330047859 |
| District RP | |
| 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? N/A |
| If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? N/A | |

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: NA | |
| 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: Garrett Green | Title: Environmental Coordinator |
| Signature:  | Date: 10/27/2023 |
| email: garrett.green@exxonmobil.com | Telephone: 575-200-0729 |
| <u>OCD Only</u> | |
| Received by: Shelly Wells | Date: 10/27/2023 |

| | |
|----------------|----------------|
| Incident ID | nAPP2330047859 |
| District RP | |
| 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? | >100 _____ (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 | nAPP2330047859 |
| District RP | |
| 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: Garrett GreenTitle: Environmental CoordinatorSignature: Date: 10/27/2023email: garrett.green@exxonmobil.comTelephone: 575-200-0729**OCD Only**Received by: Shelly WellsDate: 10/27/2023

| | |
|----------------|----------------|
| Incident ID | nAPP2330047859 |
| District RP | |
| Facility ID | |
| Application ID | |


Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

Closure Report Attachment Checklist: *Each of the following items must be included in the closure report.*

- ☐ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☒ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☐ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☐ Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Garrett Green Title: Environmental Coordinator
Signature:  Date: 10/27/2023
email: garrett.green@exxonmobil.com Telephone: 575-200-0729

OCD Only

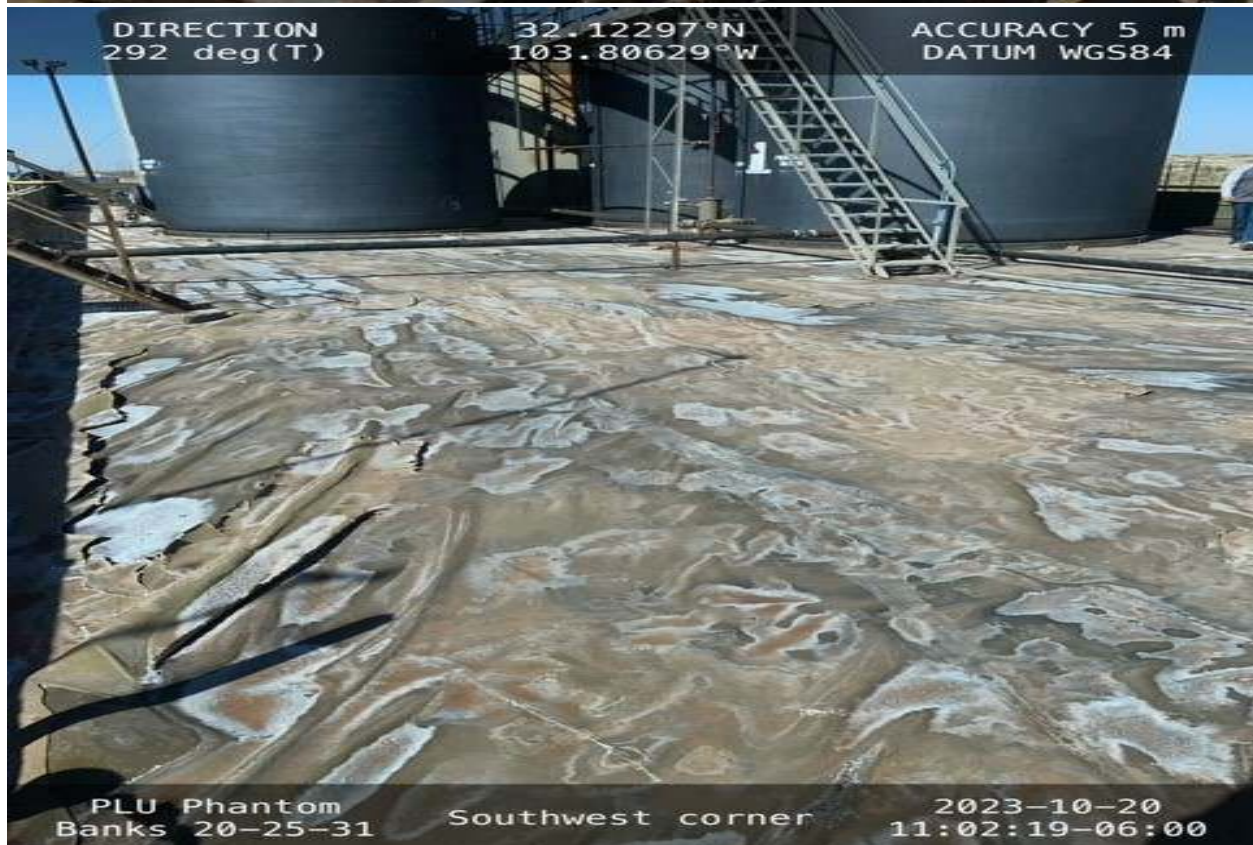
Received by: Shelly Wells Date: 10/27/2023

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____

| | | |
|-------------------------------|---------------------------------------|--------|
| Location: | PLU Phantom Banks 20-25-31 CTB | |
| Spill Date: | 10/13/2023 | |
| Area 1 | | |
| Approximate Area = | 56.14 | cu.ft. |
| VOLUME OF LEAK | | |
| Total Crude Oil = | 0.00 | bbls |
| Total Produced Water = | 10.00 | bbls |
| TOTAL VOLUME OF LEAK | | |
| Total Crude Oil = | 0.00 | bbls |
| Total Produced Water = | 10.00 | bbls |
| TOTAL VOLUME RECOVERED | | |
| Total Crude Oil = | 0.00 | bbls |
| Total Produced Water = | 10.00 | bbls |





Collins, Melanie

From: Collins, Melanie
Sent: Monday, October 16, 2023 3:03 PM
To: ocd.enviro (ocd.enviro@emnrd.nm.gov)
Cc: Green, Garrett J; DelawareSpills /SM; Lambert, Tommee L
Subject: XTO Energy 48-Hour liner inspection notice PLU PB 20-25-31 10/20/2023

All,

This is a 48-hour advance notice that XTO Energy plans to inspect the lined containment at PLU Phantom Banks 20-25-31 Battery on October 20, 2023, at 11 a.m. MDT near the coordinates listed below.

GPS 32.12298, -103.80673

Please reach out with questions or concerns.

Thank you,

Melanie Collins



Environmental Technician

melanie.collins@exxonmobil.com

432-556-3756

USGS 320643103465002 25S.31E.21.413314A

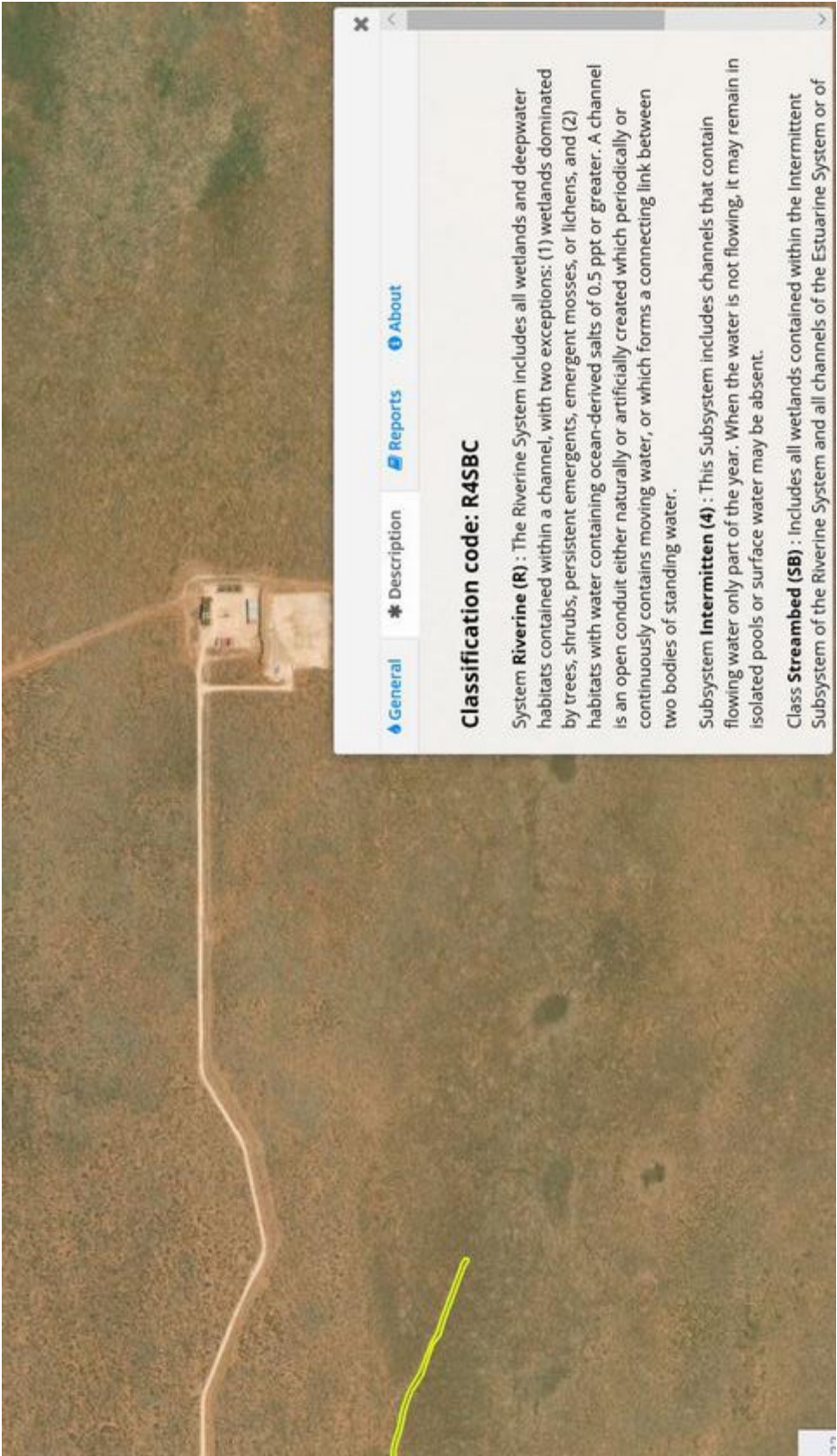
Eddy County, New Mexico
Latitude 32°06'46.0" Longitude 103°46'56.3" NAD83
Land-surface elevation 3,374.00 feet above NGVD29
The depth of the well is 400 feet below land surface.
This well is completed in the Alluvium, Bolson Deposits and Other Surface Deposits
(110AVMB) local aquifer.

Output formats

| |
|--------------------|
| Table of data |
| Tab-separated data |
| Graph of data |
| Reselect period |

| | | | | | | | | | | | |
|------------|-----------|--------------------------------|--------------------------------------|---|---------------------------|----------------------|--------|-----------------------|------------------|-----------------------|-----------------------------|
| Date | Time | Water-level date-time accuracy | Water level, feet below land surface | Water level, feet above specific vertical datum | Referenced vertical datum | Water-level accuracy | Status | Method of measurement | Measuring agency | Source of measurement | Water-level approval status |
| 1959-02-17 | | | | | | | | | | | |
| 2013-01-17 | 12:40 MST | D | m | 318.02 | | 2 | P | U | USGS | U | A |





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

General Information
Phone: (505) 629-6116

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

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

QUESTIONS

Action 410409

QUESTIONS

| | |
|---|---|
| Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707 | OGRID: 5380 |
| | Action Number: 410409 |
| | Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

QUESTIONS

| | |
|------------------|---|
| Prerequisites | |
| Incident ID (n#) | nAPP2425735479 |
| Incident Name | NAPP2425735479 PLU PHANTOM BANKS 20 25 31 USA BATTERY @ 0 |
| Incident Type | Produced Water Release |
| Incident Status | Remediation Closure Report Received |

| | |
|--|--|
| Location of Release Source | |
| Please answer all the questions in this group. | |
| Site Name | PLU Phantom Banks 20 25 31 USA Battery |
| Date Release Discovered | 09/11/2024 |
| Surface Owner | Federal |

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

| | |
|--|--|
| Nature and Volume of Release | |
| Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission. | |
| Crude Oil Released (bbls) Details | Not answered. |
| Produced Water Released (bbls) Details | Cause: Corrosion Flow Line - Production Produced Water Released: 15 BBL Recovered: 15 BBL Lost: 0 BBL. |
| Is the concentration of chloride in the produced water >10,000 mg/l | Yes |
| Condensate Released (bbls) Details | Not answered. |
| Natural Gas Vented (Mcf) Details | Not answered. |
| Natural Gas Flared (Mcf) Details | Not answered. |
| Other Released Details | Not answered. |
| Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts) | Not answered. |

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Energy, Minerals and Natural Resources
Oil Conservation Division
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QUESTIONS, Page 2

Action 410409

QUESTIONS (continued)

| | |
|---|---|
| Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707 | OGRID: 5380 |
| | Action Number: 410409 |
| | Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

QUESTIONS

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

Initial Response

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

| | |
|--|---------------|
| The source of the release has been stopped | True |
| The impacted area has been secured to protect human health and the environment | True |
| Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices | True |
| All free liquids and recoverable materials have been removed and managed appropriately | True |
| If all the actions described above have not been undertaken, explain why | Not answered. |

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

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

| | |
|--|--|
| I hereby agree and sign off to the above statement | Name: Colton Brown Title: Environmental Advisor Email: colton.s.brown@exxonmobil.com Date: 09/13/2024 |
|--|--|

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QUESTIONS, Page 3

Action 410409

QUESTIONS (continued)

| | |
|---|----------------|
| Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707 | OGRID: |
| | 5380 |
| | Action Number: |
| | 410409 |
| Action Type: | |
| [C-141] Remediation Closure Request C-141 (C-141-v-Closure) | |

QUESTIONS

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

| | |
|---|------------|
| Remediation Plan | |
| <i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i> | |
| Requesting a remediation plan approval with this submission | Yes |
| <i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i> | |
| Have the lateral and vertical extents of contamination been fully delineated | Yes |
| Was this release entirely contained within a lined containment area | Yes |
| <i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i> | |
| On what estimated date will the remediation commence | 09/11/2024 |
| On what date will (or did) the final sampling or liner inspection occur | 09/26/2024 |
| On what date will (or was) the remediation complete(d) | 09/26/2024 |
| What is the estimated surface area (in square feet) that will be remediated | 7100 |
| What is the estimated volume (in cubic yards) that will be remediated | 0 |
| <i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i> | |
| <i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i> | |

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QUESTIONS, Page 4

Action 410409

QUESTIONS (continued)

| | |
|---|---|
| Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707 | OGRID: 5380 |
| | Action Number: 410409 |
| | Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

QUESTIONS

| | |
|--|--|
| Remediation Plan (continued) | |
| <i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i> | |
| This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants: | |
| (Select all answers below that apply.) | |
| Is (or was) there affected material present needing to be removed | No |
| Is (or was) there a power wash of the lined containment area (to be) performed | Yes |
| OTHER (Non-listed remedial process) | No |
| <i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i> | |
| I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. | |
| I hereby agree and sign off to the above statement | Name: Kailee Smith Title: Regulatory Analyst Email: kailee.smith@exxonmobil.com Date: 12/10/2024 |
| <i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i> | |

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QUESTIONS, Page 6

Action 410409

QUESTIONS (continued)

| | |
|---|---|
| Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707 | OGRID: 5380 |
| | Action Number: 410409 |
| | Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

QUESTIONS

| Liner Inspection Information | |
|---|-------------------|
| Last liner inspection notification (C-141L) recorded | 384154 |
| Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC | 09/26/2024 |
| Was all the impacted materials removed from the liner | Yes |
| What was the liner inspection surface area in square feet | 7100 |

Remediation Closure Request

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

| | |
|---|--|
| Requesting a remediation closure approval with this submission | Yes |
| Have the lateral and vertical extents of contamination been fully delineated | Yes |
| Was this release entirely contained within a lined containment area | Yes |
| What was the total surface area (in square feet) remediated | 7100 |
| What was the total volume (cubic yards) remediated | 0 |
| Summarize any additional remediation activities not included by answers (above) | Liner integrity inspection activities were conducted following a release of produced water within a lined containment at the Site. Following removal of all fluids and debris, a liner integrity inspection was conducted by Ensolum personnel on September 26, 2024. Upon inspection, no rips, tears, holes, or damage were observed, and the liner was determined to be operating as designed. The release was contained laterally by the lined containment walls. |

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (in .pdf format) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

| | |
|--|---|
| I hereby agree and sign off to the above statement | Name: Kailee Smith Title: Regulatory Analyst Email: kailee.smith@exxonmobil.com Date: 12/10/2024 |
|--|---|

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CONDITIONS

Action 410409

CONDITIONS

| | |
|---|---|
| Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707 | OGRID: 5380 |
| | Action Number: 410409 |
| | Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

CONDITIONS

| Created By | Condition | Condition Date |
|------------|-----------|----------------|
| jburdine | None | 12/16/2024 |