

May 19, 2025

New Mexico Oil Conservation Division

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

Re: Closure Request

Handle Compressor Station

Incident Number nAPP2504932560

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 Handle Compressor Station (Site) following a release of produced water within a lined containment. Based on the liner integrity inspection activities, XTO is submitting this *Closure Request*, describing the inspection results and requesting closure for Incident Number nAPP2504932560.

SITE DESCRIPTION AND RELEASE SUMMARY

The Site is located in Unit K, Section 07, Township 23 South, Range 31 East, in Eddy County, New Mexico (32.31632°, -103.81695°) and is associated with oil and gas exploration and production operations on federal land managed by the Bureau of Land Management (BLM).

On February 17, 2025, human error resulted in the release of approximately 33 barrels (bbls) of lube oil into a lined containment constructed on top of an elevated concrete pad. Operators found oil on the skids of units 2 and 3. After investigating, they found the "quick fill" valves for each compressor frame in the open position which allowed a continual feed of oil from the day tank to push into the compressor frames. When this happened, it overfilled each frame and pushed oil out the top vents onto the skid. Once on the skid, the oil drained to the skid drain sump. All oil was contained to each compressor skid and the sumps. A vacuum truck and wash crew were dispatched to pump out the sump and to wash each skid. The quick fill valves were confirmed closed, and locks were installed on each unit. All 33 bbls of oil were recovered. XTO reported the release to the New Mexico Oil Conservation Division (NMOCD) via a Notification of Release (NOR) and subsequently submitted an Initial Release C-141 Form (C-141) on February 18, 2025. The release was assigned Incident Number nAPP2504932560.

SITE CHARACTERIZATION AND CLOSURE CRITERIA

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

Depth to groundwater at the Site is estimated to be between 51 to 100 feet below ground surface (bgs) based on nearby depth to groundwater data. The closest permitted groundwater well with depth to

Ensolum, LLC | Environmental, Engineering & Hydrogeologic Consultants 3122 National Parks Highway | Carlsbad, NM 88220 | ensolum.com XTO Energy, Inc Closure Request Handle Compressor Station

groundwater data is United States Geological Survey (USGS) well 321918103484302, located approximately 0.46 miles northeast of the Site. The groundwater well has a reported depth to groundwater of 61 feet bgs. The Well Record is included in Appendix A.

The closest continuously flowing or significant watercourse to the Site is a seasonal dry wash located approximately 2,473 feet northwest of the Site. The Site is greater than 200 feet from a lakebed, sinkhole, or playa lake and greater than 300 feet from an occupied residence, school, hospital, institution, church, or wetland. The Site is greater than 1,000 feet to a freshwater well or spring and is not within a 100-year floodplain or overlying a subsurface mine. The Site is underlain by unstable geology (medium potential karst designation area).

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

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

LINER INTEGRITY INSPECTION ACTIVITIES

A 48-hour advance notice of the liner inspection was submitted to the NMOCD on February 19, 2025. A liner integrity inspection was conducted by Ensolum personnel on February 24, 2025. The lined containment was inspected and the inspection results determined that the liner was operating as designed. Upon inspection, no rips, tears, holes, or damage was observed. Photographic documentation of the inspection is included in Appendix B.

CLOSURE REQUEST

Liner integrity inspection activities were completed following the release of lube oil within a lined containment at the Site. A liner integrity inspection was conducted by Ensolum personnel on February 24, 2025. Upon inspection, no rips, tears, holes, or damage was observed, and the liner was 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 Number nAPP2504932560.

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

Sincerely, **Ensolum, LLC**

Jeremy Reich

Tacoma Morrissey, M.S.

Moursey



XTO Energy, Inc Closure Request Handle Compressor Station

Project Geologist

Assistant Principal

Cc: Colton Brown, XTO

Kaylan Dirkx, XTO

BLM

Appendices:

Figure 1 Site Receptor Map

Figure 2 Site Map

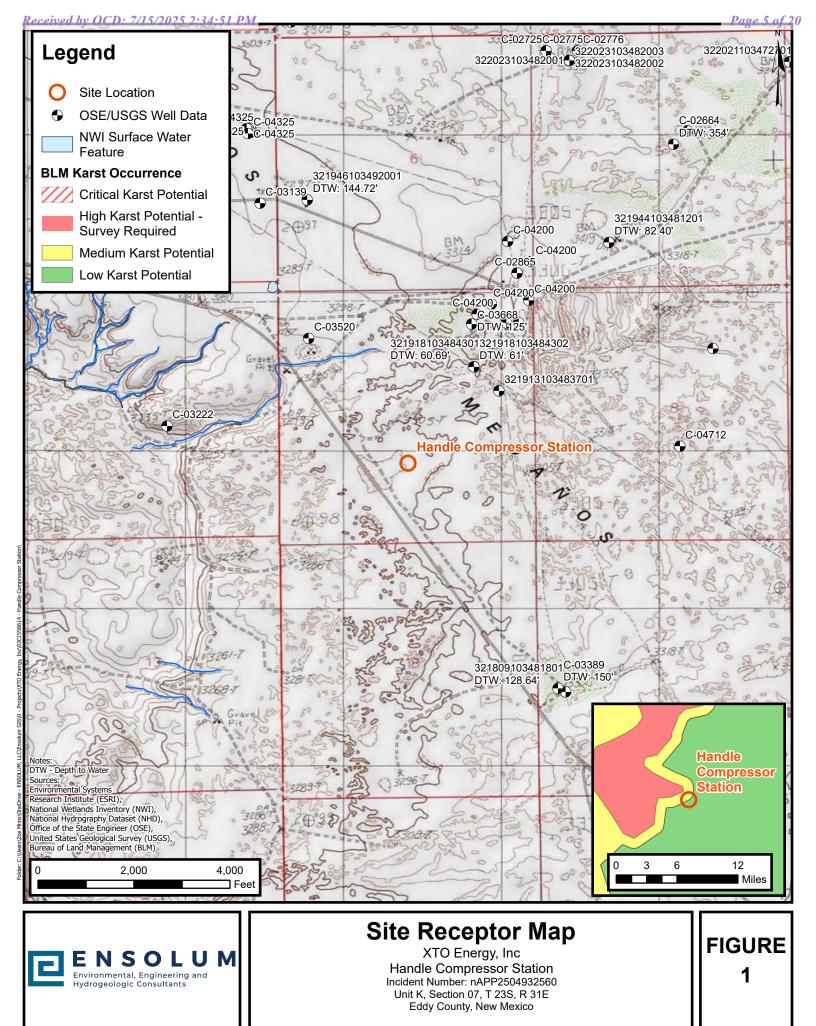
Appendix A Referenced Well Records

Appendix B Photographic Log





FIGURES



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Site Map

XTO Energy, Inc Handle Compressor Station Incident Number: nAPP2504932560 Unit K, Section 07, T 23S, R 31E Eddy County, New Mexico FIGURE 2



APPENDIX A

Referenced Well Records



USGS Home **Contact USGS** Search USGS

National Water Information System: Web Interface

USGS Water Resources



Click to hideNews Bulletins

• Explore the NEW <u>USGS National Water Dashboard</u> interactive map to access real-time water data from over 13,500 stations nationwide.

Groundwater levels for the Nation

Important: Next Generation Monitoring Location Page

Search Results -- 1 sites found

Agency code = usgs site_no list =

• 321918103484302

Minimum number of levels = 1

Save file of selected sites to local disk for future upload

USGS 321918103484302 23S.31E.07.21424 A

Eddy County, New Mexico

Latitude 32°19'18", Longitude 103°48'43" NAD27

Land-surface elevation 3,303 feet above NAVD88

This well is completed in the Other aquifers (N9999OTHER) national aquifer.

This well is completed in the Chinle Formation (231CHNL) local aquifer.

	Output formats					
Table of data						
Tab-separated	Tab-separated data					
Graph of data	Graph of data					
Reselect period	Reselect period					
	?	Water	Water			

Date	Time	? Water-level date-time accuracy	? Parameter code	Water level, feet below land surface	Water level, feet above specific vertical datum	Referenced vertical datum	? Status	? Method of measurement	? Measuring agency	? Source measur
1972-09-20		D	62610		3239.10	NGVD29	1	Z		
1972-09-20		D	62611		3240.73	NAVD88	1	Z		
1972-09-20		D	72019	62.27	32.0173		1	Z		
1976-12-04		D	62610		3238.78	NGVD29	Р	Z		
1976-12-04		D	62611		3240.41	NAVD88	Р	Z		
1976-12-04		D	72019	62.59			Р	Z		
1992-11-16		D	62610		3240.68	NGVD29	1	S		
1992-11-16		D	62611		3242.31	NAVD88	1	S		
1992-11-16		D	72019	60.69			1	S		

Explanation

Section	Code	Description
Water-level date-time accuracy	D	Date is accurate to the Day
Parameter code	62610	Groundwater level above NGVD 1929, feet
Parameter code	62611	Groundwater level above NAVD 1988, feet
Parameter code	72019	Depth to water level, feet below land surface

Section	Code	Description
Referenced vertical datum	NAVD88	North American Vertical Datum of 1988
Referenced vertical datum	NGVD29	National Geodetic Vertical Datum of 1929
Status	1	Static
Status	Р	Pumping
Method of measurement	S	Steel-tape measurement.
Method of measurement	Z	Other.
Measuring agency		Not determined
Source of measurement		Not determined
Water-level approval status	Α	Approved for publication Processing and review completed.

<u>Questions or Comments</u> <u>Help</u> Data Tips Explanation of terms Subscribe for system changes

Accessibility FOIA Privacy Policies and Notices

U.S. Department of the Interior | U.S. Geological Survey

Title: Groundwater for USA: Water Levels

URL: https://nwis.waterdata.usgs.gov/nwis/gwlevels?

Page Contact Information: <u>USGS Water Data Support Team</u> Page Last Modified: 2025-04-07 13:53:44 EDT

0.3 0.22 nadww02





APPENDIX B

Photographic Log

ENSOLUM

Photographic Log

XTO Energy, Inc. Handle Compressor Station nAPP2504932560



Photograph 1

Date: 2/17/2025

Description: Initial release in elevated lined containment



Photograph 2

Date: 2/24/2025

Description: Compressor and elevated liner to be inspected

ENSOLUM

Photographic Log

XTO Energy, Inc. Handle Compressor Station nAPP2504932560



Photograph 5

Description: Facility sign



Photograph 6 Date: 2/24/2025

Description: View of elevated liner



Photographic Log

XTO Energy, Inc. Handle Compressor Station nAPP2504932560



Photograph 3 Date: 2/24/2025

Description: View of elevated liner



Photograph 4 Date: 2/24/2025

Description: View of elevated liner



Photographic Log

XTO Energy, Inc. Handle Compressor Station nAPP2504932560



Photograph 5 Date: 2/24/2025

Description: View of elevated liner



Photograph 6 Date: 2/24/2025

Description: View of elevated liner

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 485114

QUESTIONS

ı	Operator:	OGRID:
ı	XTO ENERGY, INC	5380
ı	6401 Holiday Hill Road	Action Number:
ı	Midland, TX 79707	485114
ı		Action Type:
ı		[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites		
Incident ID (n#)	nAPP2504932560	
Incident Name	NAPP2504932560 HANDLE COMPRESSOR STATION @ 0	
Incident Type	Release Other	
Incident Status	Remediation Closure Report Received	

Location of Release Source				
Please answer all the questions in this group.				
Site Name	HANDLE COMPRESSOR STATION			
Date Release Discovered	02/17/2025			
Surface Owner	Federal			

Incident Details				
Please answer all the questions in this group.				
Incident Type	Release Other			
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	Not answered.			
Is the concentration of chloride in the produced water >10,000 mg/l	No			
Condensate Released (bbls) Details	Not answered.			
Natural Gas Vented (Mcf) Details	Not answered.			
Natural Gas Flared (Mcf) Details	Not answered.			
Other Released Details	Cause: Human Error Other (Specify) Lube Oil Released: 33 BBL Recovered: 33 BBL Lost: 0 BBL.			
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	over fill of the compressor frames			

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QUESTIONS, Page 2

Action 485114

QUESTI	IONS (continued)
Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:
QUESTIONS	
Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.	e. gas only) are to be submitted on the C-129 form.
Initial Response	
The responsible party must undertake the following actions immediately unless they could create a s	safety hazard that would result in injury. I
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.
	I lation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative ted or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of evaluation in the follow-up C-141 submission.
to report and/or file certain release notifications and perform corrective actions for releathe OCD does not relieve the operator of liability should their operations have failed to	knowledge and understand that pursuant to OCD rules and regulations all operators are required asses which may endanger public health or the environment. The acceptance of a C-141 report by adequately investigate and remediate contamination that pose a threat to groundwater, surface t does not relieve the operator of responsibility for compliance with any other federal, state, or
I hereby agree and sign off to the above statement	Name: Colton Brown Title: Environmental Advisor Email: colton.s.brown@exxonmobil.com Date: 02/19/2025

General Information Phone: (505) 629-6116

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QUESTIONS, Page 3

Action 485114

QUESTIONS (continued)

Operator:	OGRID:
XTO ENERGY, INC	5380
6401 Holiday Hill Road	Action Number:
Midland, TX 79707	485114
	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Site Characterization				
Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.				
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 51 and 75 (ft.)			
What method was used to determine the depth to ground water	NM OSE iWaters Database Search			
Did this release impact groundwater or surface water	No			
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:				
A continuously flowing watercourse or any other significant watercourse	Between 1 and 5 (mi.)			
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 5 (mi.)			
An occupied permanent residence, school, hospital, institution, or church	Between ½ and 1 (mi.)			
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between ½ and 1 (mi.)			
Any other fresh water well or spring	Between ½ and 1 (mi.)			
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)			
A wetland	Between ½ and 1 (mi.)			
A subsurface mine	Between 1 and 5 (mi.)			
An (non-karst) unstable area	Zero feet, overlying, or within area			
Categorize the risk of this well / site being in a karst geology	Medium			
A 100-year floodplain	Greater than 5 (mi.)			
Did the release impact areas not on an exploration, development, production, or storage site	No			

Remediation Plan	
Please answer all the questions that apply or are indicated. This information must be provided t	to the appropriate district office no later than 90 days after the release discovery date.
Requesting a remediation plan approval with this submission	Yes
Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination	on associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes complete which includes the anticipated timelines for beginning and completing the remediation.	ed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC,
On what estimated date will the remediation commence	02/24/2025
On what date will (or did) the final sampling or liner inspection occur	02/24/2025
On what date will (or was) the remediation complete(d)	02/24/2025
What is the estimated surface area (in square feet) that will be remediated	0
What is the estimated volume (in cubic yards) that will be remediated	0
These estimated dates and measurements are recognized to be the best guess or calculation at t	the time of submission and may (be) change(d) over time as more remediation efforts are completed.

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to

significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 4

Action 485114

QUESTIONS (continued)

Operator:	OGRID:
XTO ENERGY, INC	5380
6401 Holiday Hill Road	Action Number:
Midland, TX 79707	485114
	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)			
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.			
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	Yes		
Is (or was) there a power wash of the lined containment area (to be) performed	Yes		
OTHER (Non-listed remedial process)	Not answered.		
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,			

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

I hereby agree and sign off to the above statement

Name: Robert Woodall Title: Environmental Analyst

Email: robert.d.woodall@exxonmobil.com

Date: 07/15/2025

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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

QUESTIONS, Page 6

Action 485114

Santa Fe, NM 87505					
QUESTI	ONS (continued)				
Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380 Action Number: 485114				
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)				
QUESTIONS					
Liner Inspection Information					
Last liner inspection notification (C-141L) recorded	433662				
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	02/24/2025				
Was all the impacted materials removed from the liner	Yes				
What was the liner inspection surface area in square feet	500				
Remediation Closure Request Only answer the questions in this group if seeking remediation closure for this release because all re	emediation 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	0				
What was the total volume (cubic yards) remediated	0				
Summarize any additional remediation activities not included by answers (above)	Liner integrity inspection activities were completed following a release of produced water within a temporary lined containment at the Site. A liner integrity inspection was conducted on February 24, 2025, and results of the inspection indicated that the liner was operating as designed and the release was contained laterally by the lined containment walls.				
	Licksure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents				
to report and/or file certain release notifications and perform corrective actions for releat the OCD does not relieve the operator of liability should their operations have failed to water, human health or the environment. In addition, OCD acceptance of a C-141 repor	knowledge and understand that pursuant to OCD rules and regulations all operators are required isses which may endanger public health or the environment. The acceptance of a C-141 report by adequately investigate and remediate contamination that pose a threat to groundwater, surface t does not relieve the operator of responsibility for compliance with any other federal, state, or ially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed no notification to the OCD when reclamation and re-vegetation are complete.				
I hereby agree and sign off to the above statement	Name: Robert Woodall Title: Environmental Analyst				

Email: robert.d.woodall@exxonmobil.com

General Information Phone: (505) 629-6116

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CONDITIONS

Action 485114

CONDITIONS

Operator:	OGRID:
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6401 Holiday Hill Road	Action Number:
Midland, TX 79707	485114
	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By		Condition Date	ĺ
michael.buchanan	The liner inspection closure request is approved for the Handle Compressor Station.	7/21/2025	