R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266-0745

August 16, 2013

Mr. Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, New Mexico 88210

RE: NMOCD 2RP-1674 - XTO Nash Unit 29 Modular Impoundment Spill Report and Remediation Plan

Dear Mike:

We sampled a background location per C-141/Part 29 approval conditions/stipulations for release event 2RP-1674. Attached is a map (Plate 1) showing the location and results of the Background Sample collected on June 24, 2013. Results are shown in the white box with red outline. Included is the laboratory Certificate of Analysis.

The Background Sample shows an average chloride concentration of 2,773 mg/kg between 1.5 and 4.5 feet below ground surface (bgs). Below 4.5 feet chloride concentration is less than 2,000 mg/kg. The Trench Sample shows a higher chloride concentration of approximately 520 mg/kg between 1.5 and 2-feet bgs.

Comparing the Trench Sample to the Background Sample, the average chloride concentration in the Trench Sample between 4 and 6 feet bgs is lower.

- average concentration of chloride between 4 and 6 feet bgs in the Trench Sample is 2,060 mg/kg.
- average concentration of chloride between 4.5 and 6 feet bgs in the Background Sample is 2,400 mg/kg.

Removing the upper 2-feet of soil within the remediation area as shown on Plate 2 will remediate the observed higher chlorides.

For your convenience, we reproduced a portion of our remediation plan as presented in our March 15 spill report, below:

> *XTO Energy proposes to excavate and dispose of the western third (30%) of the caliche pad that was in contact with the modular impoundment. The 30% area includes the release area and out beyond to the edge of the caliche pad. Plate 2 identifies the area proposed for remediation. The excavated material will be transported to R360 or equivalent for proper disposal.*
>
> *The remediated area will be contoured and seeded using BLM Seed Mixture Type 4 with Giant Sacaton seed added to the mixture.*

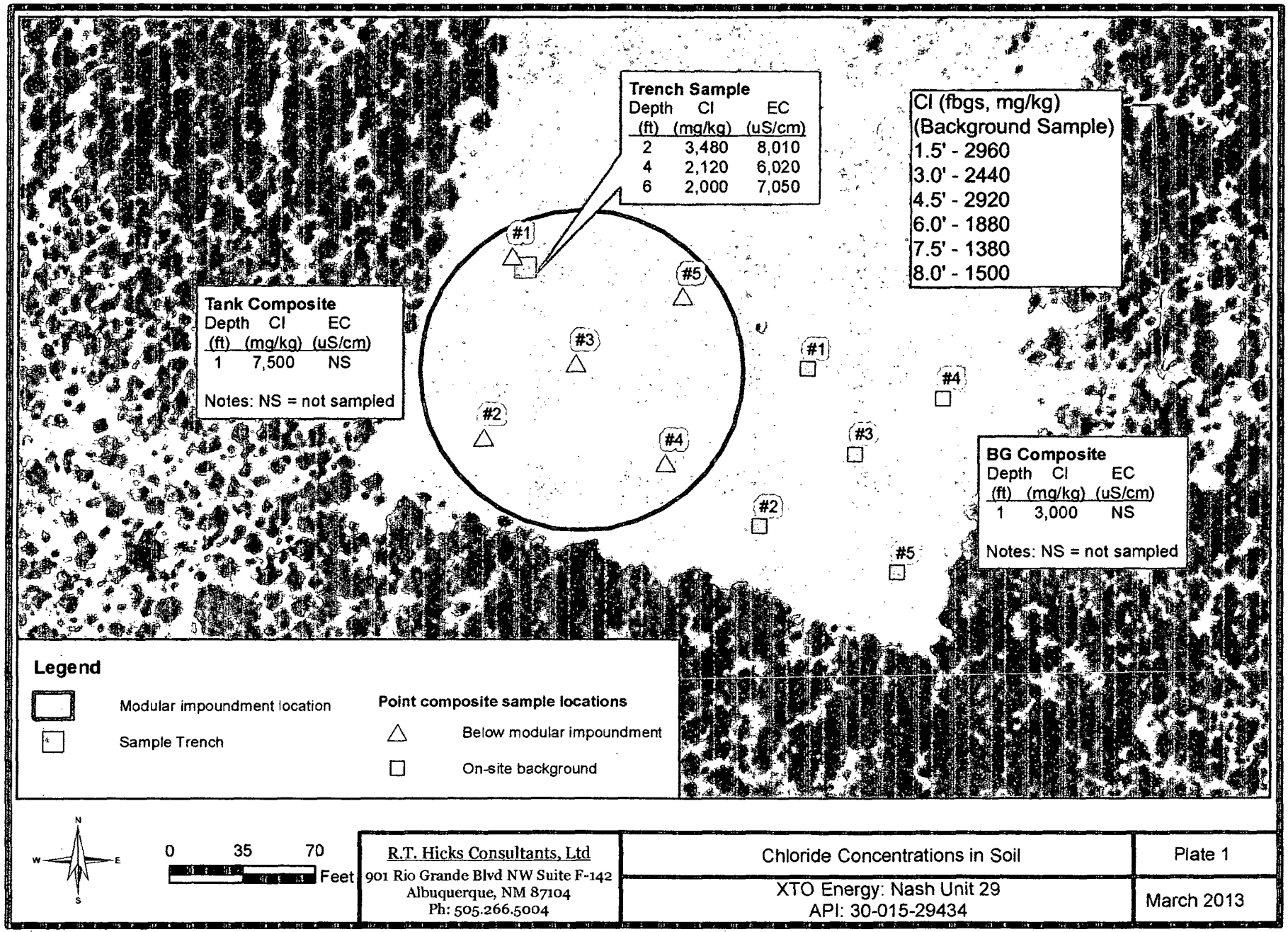
We anticipate starting remedial activities within the next few weeks. We will notify NMOCD 48-hours prior to remedial activities.

Please contact me at 970-570-9535 if you have any questions or comments.

Sincerely,
R.T. Hicks Consultants
Durango Field Office

Andrew Parker

Cc: David Luna, XTO Energy, via email



R.T. Hicks Consultants, Ltd 901 Rio Grande Blvd NW Suite F-142 Albuquerque, NM 87104 Ph: 505.266.5004	Chloride Concentrations in Soil	Plate 1
	XTO Energy: Nash Unit 29 API: 30-015-29434	March 2013

CARDINAL Laboratories

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name:	R.T. Hicks Consultants	**BILL TO**	
Project Manager:	Kristin Pope	P.O. #:	
Address:		Company:	RT Hicks
City:	State: Zip:	Attn:	
Phone #:	Fax #:	Address:	
Project #:	Project Owner: XTO	City:	
Project Name:	XTO Nash Draw 29	State: Zip:	
Project Location:	Eddy County	Phone #:	
Sampler Name:	K. Pope	Fax #:	

FOR LAB USE ONLY				MATRIX							PRESERV.			SAMPLING		ANALYSIS REQUEST
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :	DATE	TIME	Cl-
H301491															
1	Background @ 1.5'	G	1			(							062413		
2	" 3'	)	1			)							"		
3	" 4.5'	)	1			)							"		
4	" 6'	)	1			)							"		
5	" 7.5'	)	1			)							"		
6	" 8'	)	1			)							"		

Relinquished By: Kristin Pope	Date: 062613 Time: 0700	Received By: Douglas Page	Phone Result: ☐ Yes ☐ No Add'l Phone #:
Relinquished By:	Date: Time:	Received By: Jodi Henson	Fax Result: ☐ Yes ☐ No Add'l Fax #:
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	Sample Condition Cool: ☐ Yes ☐ No Intact: ☑ Yes ☐ No	CHECKED BY: (Initials)	REMARKS: Email to andrew@rthicksconsult.com and kristin @ "

5°C

† Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326

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