

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-144
Revised June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.
For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Below-Grade Tank, or
Proposed Alternative Method Permit or Closure Plan Application

Type of action: ☐ Below grade tank registration
☐ Permit of a pit or proposed alternative method
☒ Closure of a pit, below-grade tank, or proposed alternative method
☐ Modification to an existing permit/or registration
☐ Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

OIL CONS. DIV DIST. 3

NOV 10 2014

Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.
Operator: XTO Energy, Inc OGRID #: 5380
Address: 382 Road 3100 Aztec, NM 87410
Facility or well name: Rowland Gas Com A 1
API Number: 30-045-29706 OCD Permit Number: _____
U/L or Qtr/Qtr A Section 25 Township 30N Range 12W County: San Juan
Center of Proposed Design: Latitude 36.78735 Longitude -108.04523 NAD: ☒ 1927 ☐ 1983
Surface Owner: ☐ Federal ☐ State ☒ Private ☐ Tribal Trust or Indian Allotment

2.
☐ **Pit:** Subsection F, G or J of 19.15.17.11 NMAC
Temporary: ☐ Drilling ☐ Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management Low Chloride Drilling Fluid ☐ yes ☐ no
☐ Lined ☐ Unlined Liner type: Thickness _____ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other _____
☐ String-Reinforced
Liner Seams: ☐ Welded ☐ Factory ☐ Other _____ Volume: _____ bbl Dimensions: L _____ x W _____ x D _____

3.
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC
Volume: 120 bbl Type of fluid: Produced Water
Tank Construction material: Steel
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other _____
Liner type: Thickness _____ mil ☐ HDPE ☐ PVC ☐ Other _____

4.
☐ **Alternative Method:**
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5.
Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)
☐ Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, hospital, institution or church)
☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet
☐ Alternate. Please specify _____

☐ Screen ☐ Netting ☐ Other _____

☐ Monthly inspections (If netting or screening is not physically feasible)

☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers

☐ Signed in compliance with 19.15.16.8 NMAC

☐ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.

☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.

☐ Yes ☐ No

Within 100 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
<u>Temporary Pit Non-low chloride drilling fluid</u>	
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
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, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
<u>Permanent Pit or Multi-Well Fluid Management Pit</u>	
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No

10.

Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC

Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

☐ Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
☐ Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

☐ Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____

11.

Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC

Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
☐ A List of wells with approved application for permit to drill associated with the pit.
☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

☐ Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____

12.

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC

Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
☐ Climatological Factors Assessment
☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Quality Control/Quality Assurance Construction and Installation Plan
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Nuisance or Hazardous Odors, including H₂S, Prevention Plan
☐ Emergency Response Plan
☐ Oil Field Waste Stream Characterization
☐ Monitoring and Inspection Plan
☐ Erosion Control Plan
☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

13.

Proposed Closure: 19.15.17.13 NMAC

Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

- Type: ☐ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☐ Permanent Pit ☐ Below-grade Tank ☐ Multi-well Fluid Management Pit
☐ Alternative
- Proposed Closure Method: ☐ Waste Excavation and Removal
☐ Waste Removal (Closed-loop systems only)
☐ On-site Closure Method (Only for temporary pits and closed-loop systems)
☐ In-place Burial ☐ On-site Trench Burial
☐ Alternative Closure Method

14.

Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

- ☒ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
☒ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC
☒ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)
☒ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☒ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☒ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

15.

Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC

Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	☐ Yes ☐ No

adopted pursuant to NMSA 1978, Section 3-27-3, as amended.

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☐ No

Within the area overlying a subsurface mine.

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ No

Within an unstable area.

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ No

Within a 100-year floodplain.

- FEMA map

☐ Yes ☐ No

16.

On-Site Closure Plan Checklist: (19.15.17.13 NMAC) *Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.*

- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
☐ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC
☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC
☐ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC
☐ Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC
☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
☐ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17.

Operator Application Certification:

I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): Logan Hixon

Title: EHS Coordinator

Signature: Logan Hixon

Date: August 22, 2014

e-mail address: Logan_Hixon@xtoenergy.com

Telephone: (505) 333-3100

18.

OCD Approval: ☐ Permit Application (including closure plan) ☒ Closure Plan (only) ☐ OCD Conditions (see attachment)

OCD Representative Signature: Jonathan D. Kelly

Approval Date: 11/10/2014

Title: Compliance Officer

OCD Permit Number: _____

19.

Closure Report (required within 60 days of closure completion): 19.15.17.13 NMAC

Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.

☒ Closure Completion Date: 10/1/14

20.

Closure Method:

- ☒ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)
☐ If different from approved plan, please explain.

21.

Closure Report Attachment Checklist: *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

- ☒ Proof of Closure Notice (surface owner and division)
☐ Proof of Deed Notice (required for on-site closure for private land only)
☐ Plot Plan (for on-site closures and temporary pits)
☒ Confirmation Sampling Analytical Results (if applicable)
☐ Waste Material Sampling Analytical Results (required for on-site closure)
☒ Disposal Facility Name and Permit Number
☒ Soil Backfilling and Cover Installation
☒ Re-vegetation Application Rates and Seeding Technique
☒ Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude _____ Longitude _____ NAD: ☐ 1927 ☐ 1983

22.

Operator Closure Certification:

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): Logan Hixon Title: EHS Coordinator

Signature: Logan Hixon Date: 10/10/14

e-mail address: Logan_Hixon@XTOEnergy.com Telephone: (505) 333-3100

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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

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: XTO Energy, Inc.	Contact: Logan Hixon	
Address: 382 Road 3100, Aztec, New Mexico 87410	Telephone No.: (505) 333-3683	
Facility Name: Rowland Gas Com A 1	Facility Type: Gas Well	
Surface Owner: Federal Land	Mineral Owner	API No. 30-045-29706

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
A	25	30 N	12W	1185	FNL	1270	FEL	San Juan

Latitude: N36*.78735 Longitude: W-108*.04523

NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: Unknown	Volume Recovered: Unknown
Source of Release: BGT	Date and Hour of Occurrence: Unknown	Date and Hour of Discovery: August 1, 2014
Was Immediate Notice Given? ☐ Yes ☐ No ☒ Not Required	If YES, To Whom? N/A	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

The below grade tank was taken out of service at the Rowland Gas Com A 1 well site due to the P&A'ing of this well site. The site was then ranked based on depth to groundwater less than 10,000 mg/l TDS according to the NMOCD Closure Criteria for Soils Beneath Below Grade Tanks. The site was placed in the most stringent standards due to an estimated depth to groundwater less than 50 feet. This set the closure standard to 100 ppm TPH via USEPA Method 418.1, 10 ppm benzene, 50 ppm total BTEX, and 600 ppm total chlorides. A composite sample was collected beneath the location of the on-site BGT, and submitted for laboratory analysis for TPH via USEPA Method 418.1 and 8015, Benzene and BTEX via USEPA Method 8021, and for total chlorides. The sample returned results below the 'Pit Rule' spill confirmation standards for Benzene, Total BTEX and the total chlorides, but above the 'pit rule' standards for TPH, confirming that a release has occurred at this location. The site was then ranked according to the NMOCD Guidelines for the Remediation of Leaks, Spills and Releases. The site was ranked a 60 due to an estimated depth to groundwater less than 50 feet, distance to water well less than 200 feet, and distance to surface water less than 200 feet. This set the closure standard to 100 ppm TPH via USEPA Method 8015, 10 ppm benzene, and 50 ppm total BTEX via USEPA Method 8021.

Describe Area Affected and Cleanup Action Taken.*

Based on TPH results of 196 ppm via USEPA Method 418.1, a release has been confirmed at this location.

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: <u>Logan Hixon</u>	OIL CONSERVATION DIVISION		
Printed Name: Logan Hixon	Approved by Environmental Specialist:		
Title: EHS Coordinator	Approval Date:	Expiration Date:	
E-mail Address: Logan_Hixon@xtoenergy.com	Conditions of Approval:		Attached ☐
Date: <u>October 10, 2014</u> Phone: 505-333-3683			

* Attach Additional Sheets If Necessary

XTO Energy Inc. San Juan Basin Below Grade Tank Closure Report

Lease Name: Rowland Gas Com A 1

API No.: 30-045-29706

Description: Unit A, Section 25, Township 30N, Range 12W, San Juan County

In accordance with Rule 19.15.17.13 NMAC the following information describes the closure requirements of below-grade tanks on XTO Energy Inc. (XTO) locations. This is XTO's standard procedure for all below-grade tanks. A separate plan will be submitted for any below-grade tank which does not conform to this plan.

General Plan

1. XTO will obtain approval of this closure plan prior to commencing closure of the below grade tank at this location pursuant to 19.15.17.13.C (1) NMAC
Closure Approval Date: September 11, 2014
2. XTO will notify the surface owner by certified mail, return receipt requested, that the operator plans closure operations at least 72 hours, but no more than one week, prior to any closure operation. Notice will include:
Surface Owner Notification Date: August 22, 2014 (Attached)
3. XTO will notify the NMOCD Aztec Office by email that the operator plans closure operations at least 72 hours, but no more than one week, prior to any closure operation. Notice will include:
NMOCD Notification Date: August 22, 2014 (Attached)
4. Within 60 days of cessation of operations, XTO will remove liquids and sludge from below-grade tanks prior to implementing a closure method and will dispose of the liquids and sludge in a division-approved facility. Approved facilities and waste streams include:
 - a. Soils, tank bottoms, produced sand, pit sludge and other exempt wastes impacted by petroleum hydrocarbons will be disposed of at:
Envirotech: Permit #NM01-0011 and IEI: Permit # NM01-0010B
 - b. Produced Water will be disposed of at:
Basin Disposal: Permit # NM01-005 and XTO owned salt water Disposal Facilities

All liquids and sludge were removed from the below grade tank prior to closure activities.

5. Within six (6) months of cessation of operations, XTO will remove the below-grade tank and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves. If there is any equipment associated with a below-grade tank, then the operator shall remove the equipment, unless the equipment is required for some other purpose.

XTO has removed the below grade tank, and will dispose of it at a division approved facility, or recycle, reclaim or reuse it in a manner that is approved by the division.

All equipment has been removed due to the plugging and abandoning of the Rowland Gas Com A 1 well site.

6. XTO will collect a closure sample of the soil beneath the location of the below grade tank that is being closed. The closure sample will consist of a five-point composite sample to include any obvious stained or wet soils, or other evidence of contamination. The closure sample will be analyzed for the constituents listed in Table I of 19.15.17.13 NMAC.

A five point composite sample was taken of the pit using sampling tools and all samples tested per 19.15.17.1 3. (Sample results attached).

TABLE I				
Depth Below bottom of pit to groundwater less than 10,000 mg/l TDS	Constituent	Method	Limit	Results
≤ 50 Feet	Chloride	EPA 9056	600 mg/kg	570.0 mg/kg
	TPH	Method 418.1	100 mg/kg	196.0 mg/kg
	BTEX	Method 8021B	50 mg/kg	0.0449 mg/kg
	Benzene	Method 8021B	10 mg/kg	0.0030 mg/kg
51 feet - 100 feet	Chloride	EPA 9056	10,000 mg/kg	
	TPH	Method 418.1	2,500 mg/kg	
	GRO + DRO	Method 8015	1,000 mg/kg	
	BTEX	Method 8021B	50 mg/kg	
	Benzene	Method 8021B	10 mg/kg	
> 100 feet	Chloride	EPA 9056	20,000 mg/kg	
	TPH	EPA 418.1	2,500 mg/kg	
	GRO + DRO	Method 8015	1,000 mg/kg	
	BTEX	Method 8021B	50 mg/kg	
	Benzene	Method 8021B	10 mg/kg	

7. If any contaminant concentration is higher than the parameters listed in Table I of 19.15.17.13 NMAC, the division may require additional delineation upon review of the results and the operator must receive approval before proceeding with closure. If all contaminant concentrations are less than or equal to the parameters listed in Table I of 19.15.17.13 NMAC, then the operator can proceed to backfill the pit, pad, or excavation with non-waste containing, uncontaminated, earthen material.

Due to TPH results via USEPA Method 418.1, a release has been confirmed for this location. A C-141 Release Notification form will be sent outlining any remediation activities regarding this release.

8. After closure has occurred, XTO will reclaim the former BGT area, if it is no longer being used for extraction of oil and gas, by substantially restoring the impacted surface area to the condition that existed prior to oil and gas operations. XTO will construct the soil cover to the site's existing grade and prevent ponding of water and erosion of the cover materials. The soil cover shall consist of the background thickness of topsoil, or one foot of suitable materials to establish vegetation at the site, whichever is greater. All areas will be reclaimed as early as practicable, and as close to their original condition or land use as possible. They shall be maintained in a way as to control dust and minimize erosion.

The pit cellar was backfilled using compacted, non-waste containing earthen material to prevent ponding of water and erosion of the cover materials, with a division prescribed soil cover.

9. XTO will complete reclamation of all disturbed areas no longer in use when the ground disturbance activities at the site have been completed. The reseeding shall take place during the first favorable growing season after closure. Reclamation activities will be considered completed when a uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre-disturbance levels, and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds.

The site will be reclaimed pursuant to landowner specifications.

A follow up email will be submitted at the time of the below grade tank cover meeting the total plant cover of at least seventy percent (70%) of pre disturbance levels, excluding noxious weeds.

10. Within 60 days of closure, XTO will submit a closure report to the Aztec office of the NMOCD, filed on Form C-144. The report will include the following:

- a. Proof of closure notice to NMOCD and surface owner
Attached
- b. Confirmation sampling analytical results
Attached
- c. Soil backfill and cover installation information
Per OCD Specifications
- d. Photo documentation of site reclamation
Attached



12065 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-5859
Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

Logan Hixon
XTO Energy - San Juan Division
382 County Road 3100
Aztec, NM 87410

Report Summary

Friday August 01, 2014

Report Number: L712958

Samples Received: 07/31/14

Client Project:

Description: Rowland GAs Com A1

The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.

Entire Report Reviewed By:

Daphne Richards , ESC Representative

Laboratory Certification Numbers

A2LA - 1461-01, AIHA - 100789, AL - 40660, CA - 01157CA, CT - PH-0197,
FL - E87487, GA - 923, IN - C-TN-01, KY - 90010, KYUST - 0016,
NC - ENV375/DW21704/BIO041, ND - R-140. NJ - TN002, NJ NELAP - TN002,
SC - 84004, TN - 2006, VA - 460132, WV - 233, AZ - 0612,
MN - 047-999-395, NY - 11742, WI - 998093910, NV - TN000032011-1,
TX - T104704245-11-3, OK - 9915, PA - 68-02979, IA Lab #364, EPA - TN002

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Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

Logan Hixon
XTO Energy - San Juan Division
382 County Road 3100
Aztec, NM 87410

August 01, 2014

Date Received : July 31, 2014
Description : Rowland GAS Com A1

ESC Sample # : L712958-01

Sample ID : FARLH-072914-0945

Site ID :

Collected By : Logan Hixon
Collection Date : 07/29/14 09:45

Project # :

Parameter	Dry Result	Det. Limit	Units	Method	Date	Dil.
Chloride	570	12.	mg/kg	9056MOD	07/31/14	1
Total Solids	84.6		%	2540 G-2011	08/01/14	1
Benzene	BDL	0.0030	mg/kg	8021/8015	07/31/14	5
Toluene	BDL	0.030	mg/kg	8021/8015	07/31/14	5
Ethylbenzene	BDL	0.0030	mg/kg	8021/8015	07/31/14	5
Total Xylene	BDL	0.0089	mg/kg	8021/8015	07/31/14	5
TPH (GC/FID) Low Fraction	BDL	0.59	mg/kg	GRO	07/31/14	5
Surrogate Recovery-%						
a,a,a-Trifluorotoluene(FID)	95.9		% Rec.	8021/8015	07/31/14	5
a,a,a-Trifluorotoluene(PID)	100.		% Rec.	8021/8015	07/31/14	5
TPH (GC/FID) High Fraction	7.2	4.7	mg/kg	3546/DRO	08/01/14	1
Surrogate recovery(%)						
o-Terphenyl	66.4		% Rec.	3546/DRO	08/01/14	1

Results listed are dry weight basis.

BDL - Below Detection Limit

Det. Limit - Practical Quantitation Limit(PQL)

Note:

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The reported analytical results relate only to the sample submitted

Reported: 08/01/14 14:37 Printed: 08/01/14 14:37

Summary of Remarks For Samples Printed
08/01/14 at 14:37:59

TSR Signing Reports: 288
R2 - Rush: Next Day

Domestic Water Well Sampling-see L609759 Lobato for tests EDD's on ALL projects email James,
Kurt and Logan all reports

Sample: L712958-01 Account: XTORNM Received: 07/31/14 09:00 Due Date: 08/01/14 00:00 RPT Date: 08/01/14 14:37



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XTO Energy - San Juan Division
Logan Hixon
382 County Road 3100

Aztec, NM 87410

Quality Assurance Report
Level II

L712958

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August 01, 2014

Analyte	Result	Laboratory Blank Units % Rec	Limit	Batch	Date Analyzed
Chloride	< 10	mg/kg		WG734750	07/31/14 14:29
Total Solids	< .1	%		WG734729	08/01/14 07:14
Benzene	< .0005	mg/kg		WG734783	07/31/14 21:25
Ethylbenzene	< .0005	mg/kg		WG734783	07/31/14 21:25
Toluene	< .005	mg/kg		WG734783	07/31/14 21:25
TPH (GC/FID) Low Fraction	< .1	mg/kg		WG734783	07/31/14 21:25
Total Xylene	< .0015	mg/kg		WG734783	07/31/14 21:25
a,a,a-Trifluorotoluene (FID)		% Rec. 97.20	59-128	WG734783	07/31/14 21:25
a,a,a-Trifluorotoluene (PID)		% Rec. 102.0	54-144	WG734783	07/31/14 21:25
TPH (GC/FID) High Fraction	< 4	mg/kg		WG734829	08/01/14 01:02
o-Terphenyl		% Rec. 72.10	50-150	WG734829	08/01/14 01:02

Analyte	Units	Result	Duplicate	RPD	Limit	Ref Samp	Batch
Chloride	mg/kg	410.	344.	17.0	20	L712988-01	WG734750
Total Solids	%	73.4	73.9	0.603	5	L712953-02	WG734729

Analyte	Units	Laboratory Control Sample Known Val Result	% Rec	Limit	Batch
Chloride	mg/kg	200 198.	99.0	80-120	WG734750
Total Solids	%	50 50.0	100.	85-115	WG734729
Benzene	mg/kg	.05 0.0473	94.6	70-130	WG734783
Ethylbenzene	mg/kg	.05 0.0478	95.5	70-130	WG734783
Toluene	mg/kg	.05 0.0477	95.5	70-130	WG734783
Total Xylene	mg/kg	.15 0.145	96.9	70-130	WG734783
a,a,a-Trifluorotoluene (FID)			97.60	59-128	WG734783
a,a,a-Trifluorotoluene (PID)			101.0	54-144	WG734783
TPH (GC/FID) Low Fraction	mg/kg	5.5 5.33	97.0	63.5-137	WG734783
a,a,a-Trifluorotoluene (FID)			99.20	59-128	WG734783
a,a,a-Trifluorotoluene (PID)			111.0	54-144	WG734783
TPH (GC/FID) High Fraction	mg/kg	60 52.1	86.9	50-150	WG734829
o-Terphenyl			83.80	50-150	WG734829

Analyte	Units	Laboratory Control Sample Duplicate Result Ref %Rec	Limit	RPD	Limit	Batch
Chloride	mg/kg	196. 198. 98.0	80-120	1.00	20	WG734750
Benzene	mg/kg	0.0464 0.0473 93.0	70-130	2.02	20	WG734783
Ethylbenzene	mg/kg	0.0464 0.0478 93.0	70-130	2.96	20	WG734783
Toluene	mg/kg	0.0462 0.0477 92.0	70-130	3.26	20	WG734783
Total Xylene	mg/kg	0.141 0.145 94.0	70-130	3.20	20	WG734783

* Performance of this Analyte is outside of established criteria.

For additional information, please see Attachment A 'List of Analytes with QC Qualifiers.'



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Logan Hixon
382 County Road 3100

Aztec, NM 87410

Quality Assurance Report
Level II

L712958

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August 01, 2014

Analyte	Units	Laboratory Result	Control Ref	Sample %Rec	Duplicate	Limit	RPD	Limit	Batch
a,a,a-Trifluorotoluene(FID)				97.40		59-128			
a,a,a-Trifluorotoluene(PID)				101.0		54-144			
TPH (GC/FID) Low Fraction	mg/kg	5.47	5.33	99.0		63.5-137	2.51	20	WG734783
a,a,a-Trifluorotoluene(FID)				99.00		59-128			WG734783
a,a,a-Trifluorotoluene(PID)				111.0		54-144			WG734783
TPH (GC/FID) High Fraction	mg/kg	51.2	52.1	85.0		50-150	1.86	20	WG734829
o-Terphenyl				83.20		50-150			WG734829

Analyte	Units	MS Res	Matrix Ref Res	Spike TV	% Rec	Limit	Ref Samp	Batch
Chloride	mg/kg	1040	655.	500	77.0*	80-120	L712988-02	WG734750
Benzene	mg/kg	0.250	0.000445	.05	100.	49.7-127	L713117-01	WG734783
Ethylbenzene	mg/kg	0.249	0.000395	.05	100.	40.8-141	L713117-01	WG734783
Toluene	mg/kg	0.251	0.000924	.05	100.	49.8-132	L713117-01	WG734783
Total Xylene	mg/kg	0.758	0.00163	.15	100.	41.2-140	L713117-01	WG734783
a,a,a-Trifluorotoluene(FID)					96.70	59-128		WG734783
a,a,a-Trifluorotoluene(PID)					100.0	54-144		WG734783
TPH (GC/FID) Low Fraction	mg/kg	27.8	0.110	5.5	100.	28.5-138	L713117-01	WG734783
a,a,a-Trifluorotoluene(FID)					98.80	59-128		WG734783
a,a,a-Trifluorotoluene(PID)					110.0	54-144		WG734783
TPH (GC/FID) High Fraction	mg/kg	51.4	0.853	60	84.0	50-150	L711598-05	WG734829
o-Terphenyl					84.10	50-150		WG734829

Analyte	Units	MSD	Matrix Ref	Spike %Rec	Duplicate	Limit	RPD	Limit	Ref Samp	Batch
Chloride	mg/kg	1020	1040	72.5*		80-120	2.00	20	L712988-02	WG734750
Benzene	mg/kg	0.264	0.250	105.		49.7-127	5.50	23.5	L713117-01	WG734783
Ethylbenzene	mg/kg	0.261	0.249	104.		40.8-141	4.55	23.8	L713117-01	WG734783
Toluene	mg/kg	0.262	0.251	104.		49.8-132	4.16	23.5	L713117-01	WG734783
Total Xylene	mg/kg	0.790	0.758	105.		41.2-140	4.12	23.7	L713117-01	WG734783
a,a,a-Trifluorotoluene(FID)				96.50		59-128				WG734783
a,a,a-Trifluorotoluene(PID)				100.0		54-144				WG734783
TPH (GC/FID) Low Fraction	mg/kg	28.1	27.8	102.		28.5-138	1.11	23.6	L713117-01	WG734783
a,a,a-Trifluorotoluene(FID)				99.10		59-128				WG734783
a,a,a-Trifluorotoluene(PID)				110.0		54-144				WG734783
TPH (GC/FID) High Fraction	mg/kg	51.5	51.4	84.4		50-150	0.200	20	L711598-05	WG734829
o-Terphenyl				83.50		50-150				WG734829

Batch number / Run number / Sample number cross reference

WG734750: R2970538: L712958-01
WG734729: R2970644: L712958-01
WG734783: R2970765: L712958-01
WG734829: R2970811: L712958-01

* * Calculations are performed prior to rounding of reported values.

* Performance of this Analyte is outside of established criteria.

For additional information, please see Attachment A 'List of Analytes with QC Qualifiers.'



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XTO Energy - San Juan Division
Logan Hixon
382 County Road 3100

Aztec, NM 87410

Quality Assurance Report
Level II

L712958

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1-800-767-5859
Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

August 01, 2014

The data package includes a summary of the analytic results of the quality control samples required by the SW-846 or CWA methods. The quality control samples include a method blank, a laboratory control sample, and the matrix spike/matrix spike duplicate analysis. If a target parameter is outside the method limits, every sample that is effected is flagged with the appropriate qualifier in Appendix B of the analytic report.

Method Blank - an aliquot of reagent water carried through the entire analytic process. The method blank results indicate if any possible contamination exposure during the sample handling, digestion or extraction process, and analysis. Concentrations of target analytes above the reporting limit in the method blank are qualified with the "B" qualifier.

Laboratory Control Sample - is a sample of known concentration that is carried through the digestion/extraction and analysis process. The percent recovery, expressed as a percentage of the theoretical concentration, has statistical control limits indicating that the analytic process is "in control". If a target analyte is outside the control limits for the laboratory control sample or any other control sample, the parameter is flagged with a "J4" qualifier for all effected samples.

Matrix Spike and Matrix Spike Duplicate - is two aliquots of an environmental sample that is spiked with known concentrations of target analytes. The percent recovery of the target analytes also has statistical control limits. If any recoveries that are outside the method control limits, the sample that was selected for matrix spike/matrix spike duplicate analysis is flagged with either a "J5" or a "J6". The relative percent difference (%RPD) between the matrix spike and the matrix spike duplicate recoveries is all calculated. If the RPD is above the method limit, the effected samples are flagged with a "J3" qualifier.

Page 1 of 1

XTO Contact Phone #
509 386-8016

Logan, James, Kurt

Well site/Location
Rowland Gas Com A 1

Collected By,
Logan Hixon

50

Fog H

30-045-29706

(K/N)

BAT closure

Standard

Next Day

1953 PAY

Std. 5 Bus. Days (by contract)

Date Needed _____

Gray Areas for Lab Use Only!

Office Abbreviations
 Farmington = FAR
 Durango = DUR
 Bakken = BAK
 Raton = RAT
 Piceance = PC
 Roosevelt = RSV
 La Barge = LB
 Orangeville = OV

Sample Number

1712958-01

Sample ID	Sample Name	Media	Date	Time	Preservative	Conts.
FARLH-072414-0945	BAT COMP	S	7-29	0945	C Coi	1-402

X	8615000 + 6601
X	80211 RFX1
X	Chlorides

Media: Filter = F Soil = S Wastewater = WW Groundwater = GW Drinking Water = DW Sludge = SG Surface Water = SW Air = A Drill Mud = DM Other = OT

Relinquished By: (Signature)

Date:

7-29-121

Time:

1600

Received By: (Signature)

Relinquished By: (Signature)

Date:

Time:

Received By: (Signature)

1 (402)

[illegible]

Temperature:

Relinquished By: (Signature)

Date:

Time:

Received for Lab by: (Signature)

Date: 7/34/1

Time: 09:54

Sample Condition

Other Information:

Comments

* Sample ID will be the office and sampler-date-military time FARUM-MMDDYY-1200

2.4

0076



Analytical Report

Report Summary

Client: XTO Energy Inc.

Chain Of Custody Number: 0077

Samples Received: 7/29/2014 3:49:00PM

Job Number: 98031-0528

Work Order: P407110

Project Name/Location: Rowland Gas Com A 1

Entire Report Reviewed By:

A handwritten signature in black ink, appearing to read "Tim Cain", is written over a horizontal line.

Date: 7/31/14

Tim Cain, Laboratory Manager

The results in this report apply to the samples submitted to Envirotech's Analytical Laboratory and were analyzed in accordance with the chain of custody document supplied by you, the client, and as such are for your exclusive use only. The results in this report are based on the sample as received unless otherwise noted. Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech, Inc. If you have any questions regarding this analytical report, please don't hesitate to contact Envirotech's Laboratory Staff.



XTO Energy Inc.
382 CR 3100
Aztec NM, 87410

Project Name: Rowland Gas Com A 1
Project Number: 98031-0528
Project Manager: Logan Hixon

Reported:
31-Jul-14 12:04

Analytical Report for Samples

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
BGT Comp	P407110-01A	Soil	07/29/14	07/29/14	Glass Jar, 4 oz.

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Ph (970) 259-0615 Fr (800) 362-1879

envirotech-inc.com
laboratory@envirotech-inc.com



XTO Energy Inc.	Project Name:	Rowland Gas Com A 1	
382 CR 3100	Project Number:	98031-0528	Reported:
Aztec NM, 87410	Project Manager:	Logan Hixon	31-Jul-14 12:04

BGT Comp
P407110-01 (Solid)

Analyte	Result	Reporting		Dilution	Batch	Prepared	Analyzed	Method	Notes
		Limit	Units						

Total Petroleum Hydrocarbons by 418.1

Total Petroleum Hydrocarbons	196	34.9	mg/kg	1	1431013	07/30/14	07/30/14	EPA 418.1	
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XTO Energy Inc.	Project Name:	Rowland Gas Com A 1	Reported: 31-Jul-14 12:04
382 CR 3100	Project Number:	98031-0528	
Aztec NM, 87410	Project Manager:	Logan Hixon	

Total Petroleum Hydrocarbons by 418.1 - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1431013 - 418 Freon Extraction										
Blank (1431013-BLK1)				Prepared & Analyzed: 30-Jul-14						
Total Petroleum Hydrocarbons	ND	34.9	mg/kg							
Duplicate (1431013-DUP1)				Source: P407109-01 Prepared & Analyzed: 30-Jul-14						
Total Petroleum Hydrocarbons	ND	35.0	mg/kg		ND				30	
Matrix Spike (1431013-MS1)				Source: P407109-01 Prepared & Analyzed: 30-Jul-14						
Total Petroleum Hydrocarbons	1930	34.9	mg/kg	2020	ND	95.4	80-120			

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XTO Energy Inc.
382 CR 3100
Aztec NM, 87410

Project Name: Rowland Gas Com A 1
Project Number: 98031-0528
Project Manager: Logan Hixon

Reported:
31-Jul-14 12:04

Notes and Definitions

DET Analyte DETECTED
ND Analyte NOT DETECTED at or above the reporting limit
NR Not Reported
dry Sample results reported on a dry weight basis
RPD Relative Percent Difference

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laboratory@envirotech-inc.com

Hixon, Logan

From: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Sent: Friday, August 15, 2014 3:58 PM
To: Hixon, Logan; Powell, Brandon, EMNRD
Cc: McDaniel, James; Hoekstra, Kurt
Subject: RE: Rowland Gas Com A 1 (BGT Closure)

Mr. Hixon

Since XTO and NMOCD cannot provide a Permit/Registration for the Rowland Gas Com A 1. NMOCD is requesting that XTO submit a closure plan following the current 19.15.17.13 NMAC regulations no later than August 29, 2014.

The OCD has reviewed the Analytical data that you have submitted for the Rowland Gas Com A 1, and has determined that the contaminate concentrations are Greater than the parameters listed in Table I of 19.15.17.13. However pursuant to 19.15.17.13.C.3(b) -

If any contaminant concentration is higher than the parameters listed in Table I of 19.15.17.13 NMAC, **the division may require** additional delineation upon review of the results and the operator must receive approval before proceeding with closure.

OCD has determined that no additional delineation is required and XTO has approval to finish closure activities in regards to the BGT so long as XTO follows all applicable rules and regulations set forth in 19.15.17 NMAC.

During the review Aztec OCD will use the "Guidelines for Remediation of Leaks Spills and Releases (Aug 13, 1999) " on a site by site basis to help determine if additional delineation is needed for the protection of fresh water, public health and the environment.

If you have any questions please contact me and the numbers listed below.

Cory Smith
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 115
cory.smith@state.nm.us

From: Hixon, Logan [mailto:Logan_Hixon@xtoenergy.com]
Sent: Friday, August 08, 2014 8:37 AM
To: Powell, Brandon, EMNRD; Smith, Cory, EMNRD
Cc: McDaniel, James; Hoekstra, Kurt
Subject: Rowland Gas Com A 1 (BGT Closure)
Importance: High

Good Afternoon,

Attached are the documents we discussed yesterday in our meeting in regards to the Rowland Gas Com A 1 BGT Closure. The sample results returned values of BDL for GRO & BTEX. This site

Hixon, Logan

From: Hixon, Logan
Sent: Friday, August 22, 2014 3:23 PM
To: 'Smith, Cory, EMNRD'
Cc: McDaniel, James; Hoekstra, Kurt
Subject: RE: Rowland Gas Com A 1 (BGT Closure)

Cory,

Per our conversation in regards to the Rowland Gas Com A 1 below grade tank closure and sampling of material beneath the below grade tank for chloride levels below 600 mg/kg.

Rule 19.15.17.13 (H) (2) - States that: Soil cover designs for drying pads associated with closed-loop systems and below-grade tanks. The soil cover for closures after site contouring, where the operator has removed the below-grade tank or drying pad contents and liner, and if necessary remediated the soil beneath the below-grade tank or drying pad liner to chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, shall consist of the background thickness of topsoil or one foot of suitable material, whichever is greater.

XTO recognizes that this site was ranked pursuant to the most stringent Table 1 closure standards and proposes that the soil cover for the closure after site contouring will consist of the background thickness of topsoil or one foot of suitable material, whichever is greater.

After review of 19.15.17.13 (H) (2), XTO believes that sampling of backfill material is not required in the (H) (2) standard, but the soil beneath the below grade tank is required to meet the chloride standard of (H) (2) set forth for the most stringent Table 1 standards where required.

With your approval XTO will continue the closure activities at Rowland Gas Com A 1 well site.

Thank you for your time and efforts in regards to this site.

If you have any questions or concerns do not hesitate to contact me at anytime. Thank you and have a good day!

Thank You!

XTO ENERGY INC., an ExxonMobil subsidiary

Logan Hixon | 72 Suttle Street, Suite J | Durango, CO 81303 | ph: 970-247-7708 | Cell: 505-386-8018

Logan Hixon | 382 CR 3100 | Aztec, NM 87410 | ph: 505-333-3100 | Logan_Hixon@xtoenergy.com

From: [Smith, Cory, EMNRD](#)
To: [Hixon, Logan](#)
Cc: [Powell, Brandon, EMNRD](#)
Subject: RE: Rowland Gas Com A 1 (BGT Closure)
Date: Friday, August 22, 2014 3:51:08 PM

Mr. Hixon

NMOCD agrees with your assessment for the Rowland Gas Com A1, and grants approval to continue closure activities.

Please keep in mind that the backfill needs to consist of the background thickness of topsoil or one foot of suitable material that provides erosion control, long term stability and preservation of surface water flow patterns as described in 19.15.17.13.H.5(b)

Thank you,

Cory Smith
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 115
cory.smith@state.nm.us

From: Hixon, Logan [mailto:Logan_Hixon@xtoenergy.com]
Sent: Friday, August 22, 2014 3:23 PM
To: Smith, Cory, EMNRD
Cc: McDaniel, James; Hoekstra, Kurt
Subject: RE: Rowland Gas Com A 1 (BGT Closure)

Cory,

Per our conversation in regards to the Rowland Gas Com A 1 below grade tank closure and sampling of material beneath the below grade tank for chloride levels below 600 mg/kg.

Rule 19.15.17.13 (H) (2) - States that: Soil cover designs for drying pads associated with closed-loop systems and below-grade tanks. The soil cover for closures after site contouring, where the operator has removed the below-grade tank or drying pad contents and liner, and if necessary remediated the soil beneath the below-grade tank or drying pad liner to chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, shall consist of the background thickness of topsoil or one foot of suitable material, whichever is

From: Hixon, Logan
To: "Smith, Cory, EMNRD"
Cc: McDaniel, James; Hoekstra, Kurt
Subject: RE: Rowland Gas Com A 1-8/22/14 (BGT Closure plan only request)
Date: Friday, August 22, 2014 4:10:00 PM
Attachments: 8-22-14 Submitted Closure Plan.pdf

Mr. Smith,

We are requesting an approved BGT closure plan only for the following site.

***-Rowland Gas Com A 1 (API 30-045-29706) located in Section 25 (A),
Township 30N, Range 12W, San Juan County, New Mexico.***

Attached is closure plan only for the above stated site.

A hard copy will be sent to your office as well.

This BGT is being closed due to the P&A'ing of this well site

***If you have any questions or concerns do not hesitate to contact me at
anytime. Thank you and have a good day!***

Thank You!

XTO ENERGY INC., an ExxonMobil subsidiary

Logan Hixon | 72 Suttle Street, Suite J | Durango, CO 81303 | ph: 970-247-7708 | Cell: 505-386-8018

Logan Hixon | 382 CR 3100 | Aztec, NM 87410 | ph: 505-333-3100 | Logan_Hixon@xtoenergy.com

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From: Hixon, Logan
Sent: Friday, August 22, 2014 3:23 PM
To: 'Smith, Cory, EMNRD'
Cc: McDaniel, James; Hoekstra, Kurt
Subject: RE: Rowland Gas Com A 1 (BGT Closure)

Cory,

Per our conversation in regards to the Rowland Gas Com A 1 below grade tank closure and sampling of material beneath the below grade tank for chloride levels below 600 mg/kg.

Rule 19.15.17.13 (H) (2) - States that: Soil cover designs for drying pads associated with closed-loop systems and below-grade tanks. The soil cover for

Hixon, Logan

From: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Sent: Wednesday, September 10, 2014 3:21 PM
To: Hixon, Logan
Cc: Powell, Brandon, EMNRD
Subject: RE: 72 Hour BGT Closure Notification 8/22/14- 8/29/14- Rowland Gas Com A 1 (30-045-29706)

Logan,

The Closure plan for the Rowland Gas Com A1 has been approved, with the following Conditions of Approval

- XTO will notify the Division when Revegetation is complete pursuant to 19.15.17.13.H.5(e)

Please add this requirement to your closure plan for future use.

Cory Smith
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 115
cory.smith@state.nm.us

From: Smith, Cory, EMNRD
Sent: Monday, August 25, 2014 7:26 AM
To: 'Hixon, Logan'
Cc: McDaniel, James; Hoekstra, Kurt; Powell, Brandon, EMNRD
Subject: RE: 72 Hour BGT Closure Notification 8/22/14- 8/29/14- Rowland Gas Com A 1 (30-045-29706)

Mr. Hixon,

See the below email that I sent on 8-15-14 in regards to the Rowland gas Com

"

Mr. Hixon

Since XTO and NMOCD cannot provide a Permit/Registration for the Rowland Gas Com A 1. NMOCD is requesting that XTO submit a closure plan following the current 19.15.17.13 NMAC regulations no later than August 29, 2014.

The OCD has reviewed the Analytical data that you have submitted for the Rowland Gas Com A 1, and has determined that the contaminate concentrations are Greater than the parameters listed in Table I of 19.15.17.13. However pursuant to 19.15.17.13.C.3(b) -

If any contaminant concentration is higher than the parameters listed in Table I of 19.15.17.13 NMAC, the division may require additional delineation upon review of the results and the operator must receive approval before proceeding with closure.

OCD has determined that no additional delineation is required and XTO has approval to finish closure activities in regards to the BGT so long as XTO follows all applicable rules and regulations set forth in 19.15.17 NMAC.

During the review Aztec OCD will use the "Guidelines for Remediation of Leaks Spills and Releases (Aug 13, 1999) " on a site by site basis to help determine if additional delineation is needed for the protection of fresh water, public health and the environment.

If you have any questions please contact me and the numbers listed below.

Cory Smith
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 115
cory.smith@state.nm.us
"

As the email indicated XTO is approved to finish closure of the BGT following all applicable rules and regulations.

If you have any questions give me a call

Thank you,

Cory Smith
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 115
cory.smith@state.nm.us

From: Hixon, Logan [mailto:Logan_Hixon@xtoenergy.com]
Sent: Friday, August 22, 2014 4:14 PM
To: Smith, Cory, EMNRD
Cc: McDaniel, James; Hoekstra, Kurt
Subject: 72 Hour BGT Closure Notification 8/22/14- 8/29/14- Rowland Gas Com A 1 (30-045-29706)

Mr. Smith,

Please accept this email as the required 72 hour notification for BGT closure activities at the following site:

-Rowland Gas Com A 1 (API 30-045-29706) located in Section 25 (A), Township 30N, Range 12W, San Juan County, New Mexico.

This BGT is being closed due to the P&A'ing of this well site.

BGT closure activities will not begin until the approved closure plan only submitted on 8/22/14 is received from NMOCD.

If there is any unforeseen delays in closure of this BGT and it will not be closed within a week's time, a follow up email notification will be made for the change.

Thank you and have a good day!

If you have any questions or concerns do not hesitate to contact me at anytime. Thank you and have a good day!

Thank You!

XTO ENERGY INC., an ExxonMobil subsidiary

Logan Hixon | 72 Suttle Street, Suite J | Durango, CO 81303 | ph: 970-247-7708 | Cell: 505-386-8018

Logan Hixon | 382 CR 3100 | Aztec, NM 87410 | ph: 505-333-3100 | Logan_Hixon@xtoenergy.com

This document may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you are not the intended recipient, you are on notice that any unauthorized disclosure, copying, distribution or taking of any action in reliance on the contents of this document is prohibited.

From: Hixon, Logan
To: Smith, Cory, EMNRD
Cc: McDaniel, James (James_McDaniel@xtoenergy.com); Hoekstra, Kurt
Subject: 72 Hour BGT Closure Notification 8/22/14- 8/29/14- Rowland Gas Com A 1 (30-045-29706)
Date: Friday, August 22, 2014 4:13:00 PM

Mr. Smith,

Please accept this email as the required 72 hour notification for BGT closure activities at the following site:

-Rowland Gas Com A 1 (API 30-045-29706) located in Section 25 (A), Township 30N, Range 12W, San Juan County, New Mexico.

This BGT is being closed due to the P&A'ing of this well site.

BGT closure activities will not begin until the approved closure plan only submitted on 8/22/14 is received from NMOCD.

If there is any unforeseen delays in closure of this BGT and it will not be closed within a week's time, a follow up email notification will be made for the change.

Thank you and have a good day!

If you have any questions or concerns do not hesitate to contact me at anytime. Thank you and have a good day!

Thank You!

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Logan Hixon | 72 Suttle Street, Suite J | Durango, CO 81303 | ph: 970-247-7708 | Cell: 505-386-8018

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August 22, 2014

Pamela L. Howlett Trust
117 Road 3100
Aztec, NM 87410

7012 1010 0002 9433 4940

CELEBRATED
(Domestic Mail Only)

For delivery information, visit www.usps.com

AZTEC NM 87410

Postage	\$ 0.49
Certified Fee	\$3.30
Return Receipt Fee (Endorsement Required)	\$2.70
Restricted Delivery Fee (Endorsement Required)	\$0.00
Total Postage & Fees	\$ 6.49

Postmarked
H516
AUG 23 2014
08/25/2014
USPS

Sent To
Pamela L. Howlett Trust
Street, Apt. No.,
or PO Box No. 117 Road 3100
City, State, ZIP+4
Aztec, NM 87410 LH
PS Form 3800, August 2006
See Reverse for Instructions

Re: Rowland Gas Com A 1

Unit A, Section 25, Township 30N, Range 12W, San Juan County, New Mexico

Pamela L. Howlett Trust,

This submittal is pursuant to Rule 19.15.17.13 requiring operators to notify surface owners of the closure of a below grade tank pit. XTO Energy, Inc. (XTO) is hereby providing written documentation of our proposal to close the below grade tank pit associated with the above mentioned well site by excavation and removal.

Should you have questions or require additional information, please feel free to contact me at your convenience at (505) 333-3100. Thank you for your time in regards to this matter.

Respectfully Submitted,

Logan Hixon

Logan Hixon

EHS Coordinator
XTO Energy, Inc.
Western Division

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. - Print your name and address on the reverse so that we can return the card to you. - Attach this card to the back of the mailpiece, or on the front if space permits.		A. Signature <i>[Signature]</i> ☒ Agent ☐ Addressee B. Received by (Printed Name) C. Date of Delivery D. Is delivery address different from item 1? ☐ Yes If YES, enter delivery address below: ☐ No	
1. Article Addressed to: Pamela L. Howlett Trust 117 Road 3100 Aztec, NM 87410 LH		3. Service Type ☒ Certified Mail ☐ Express Mail ☐ Registered ☐ Return Receipt for Merchandise ☐ Insured Mail ☐ C.O.D.	
2. Article Number (Transfer from service label) 7012 1010 0002 9433 4940		4. Restricted Delivery? (Extra Fee) ☐ Yes	

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540



Well Below Tank Inspection Report

RouteName	StopName		Pumper	Foreman	WellName	APIWellNumber	Section	Range	Township		
DEN NM Run 64	ROWLAND GAS COM / Simmons, Doug			Durham, Ken	ROWLAND GC A 01	3004529706	25	12W	30N		
InspectorName	Inspection Date	Inspection Time	Visible LinerTears	VisibleTankLeak Overflow	Collection OfSurfaceRun	Visible LayerOil	Visible Leak	Freeboard EstFT	PitLocation	PitType	Notes
RICK HOVLAND	08/31/2008	08:30	No	No	No	Yes	No	3			
DOUG	09/23/2008	09:40	No	No	No	Yes	No	3			
mg	12/14/2008	09:00	No	No	No	Yes	No	3			
DS	02/19/2009	09:00	No	No	No	Yes	No	3	Well Water	Below Ground	
DS	03/12/2009	09:00	No	No	No	Yes	No	3	Well Water	Below Ground	
DS	04/10/2009	09:00	No	No	No	Yes	No	3	Well Water	Below Ground	
DS	05/13/2009	09:00	No	No	No	Yes	No	3	Well Water	Below Ground	
DS	07/23/2009	09:00	No	No	No	Yes	No	3	Well Water	Below Ground	
DS	05/06/2010	01:00	No	No	No	Yes	No	2	Well Water	Below Ground	
ds	07/08/2010	03:00	No	Yes	No	No	No	4	Well Water	Below Ground	
DS	04/19/2011	01:00	No	No	No	Yes	No	2	Well Water	Below Ground	
DS	10/28/2011	01:00	No	No	No	Yes	No	2	Well Water	Below Ground	
DS	11/21/2011	01:00	No	No	No	Yes	No	2	Well Water	Below Ground	
ds	11/21/2011	03:00	No	Yes	No	No	No	4	Well Water	Below Ground	
DS	12/22/2011	01:00	No	No	No	Yes	No	2	Well Water	Below Ground	
DS	02/17/2012	01:00	No	No	No	Yes	No	2	Well Water	Below Ground	
DS	03/08/2012	01:00	No	No	No	Yes	No	2	Well Water	Below Ground	
DS	08/13/2012	01:00	No	No	No	Yes	No	2	Well Water	Below Ground	
ds	08/13/2012	03:00	No	Yes	No	No	No	2	Well Water	Below Ground	
DS	09/04/2012	01:00	No	No	No	Yes	No	2	Well Water	Below Ground	
ds	09/04/2012	03:00	No	Yes	No	No	No	2	Well Water	Below Ground	
DS	10/05/2012	01:00	No	No	No	Yes	No	2	Well Water	Below Ground	
ds	10/05/2012	03:00	No	Yes	No	No	No	2	Well Water	Below Ground	
DS	11/02/2012	01:00	No	No	No	Yes	No	1	Well Water	Below Ground	
ds	11/02/2012	12:00	No	Yes	No	No	No	1	Well Water	Below Ground	
DS	12/03/2012	01:00	No	No	No	Yes	No	1	Well Water	Below Ground	

XTO Energy, Inc.
Rowland Gas Com A 1 (30-045-29706)
Section 25 (A), Township 30N, Range 12W
Closure Date: October 1, 2014



Photo 1: Rowland Gas Com A 1 after Reclamation.



Photo 2: Rowland Gas Com A 1 after Reclamation.

XTO Energy, Inc.
Rowland Gas Com A 1 (30-045-29706)
Section 25 (A), Township 30N, Range 12W
Closure Date: October 1, 2014



Photo 3: Rowland Gas Com A 1 after Reclamation.

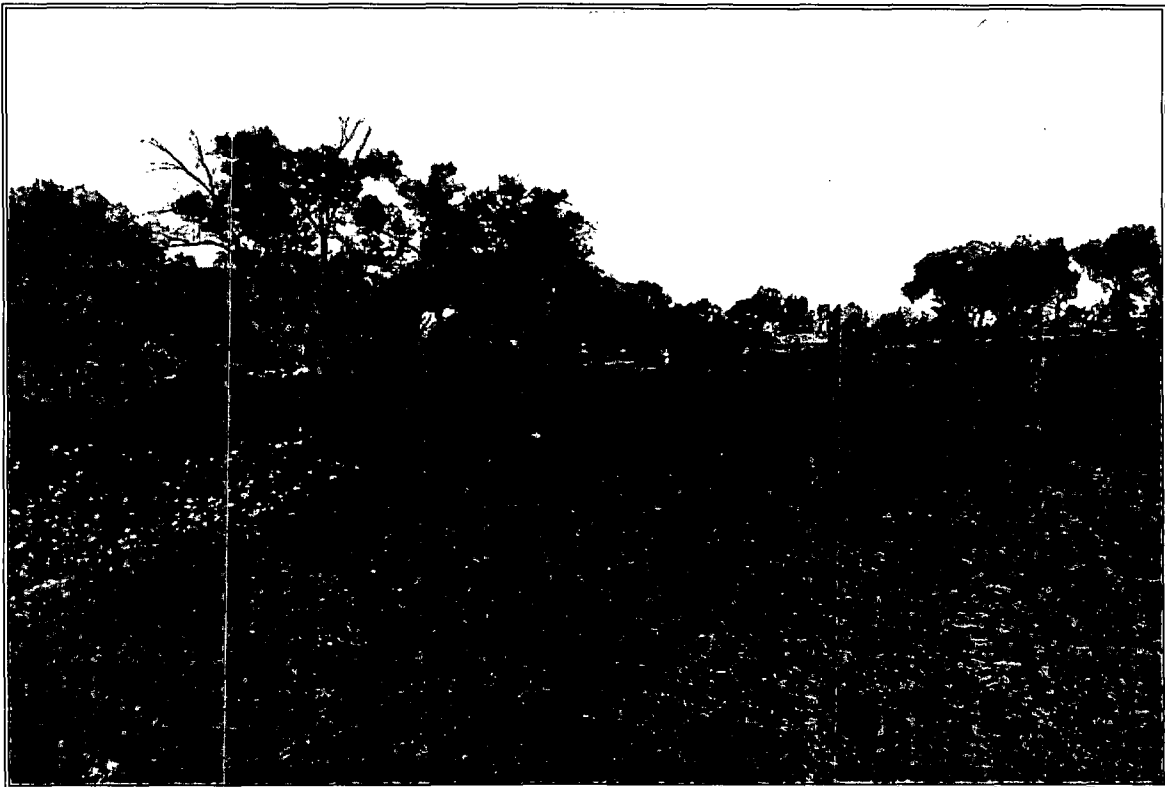


Photo 4: Rowland Gas Com A 1 after Reclamation.