

\*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.

14485

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

OIL CONS. DIV DIST. 3

- 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

MAY 16 2016

**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, New Mexico 87410  
Facility or well name: Little Stinker # 1  
API Number: 30-045-25532 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr J Section 11 Township 30N Range 12W County: San Juan  
Center of Proposed Design: Latitude 36.823549 Longitude -108.065345 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: 21 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 Visible sidewalls, vaulted, automatic high-level shut off  
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: \_\_\_\_\_

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6. **Netting:** Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)

Screen  Netting  Other: Expanded metal or solid vaulted top

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

7. **Signs:** Subsection C of 19.15.17.11 NMAC

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

Signed in compliance with 19.15.16.8 NMAC

8. **Variations and Exceptions:**  
Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

**Please check a box if one or more of the following is requested, if not leave blank:**

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.

9. **Siting Criteria (regarding permitting):** 19.15.17.10 NMAC

**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.**

### General siting

**Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.**

-  NM Office of the State Engineer - iWATERS database search;  USGS;  Data obtained from nearby wells

Yes  No  
 NA

**Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.**  
NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

Yes  No  
 NA

Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (**Does not apply to below grade tanks**)

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

Yes  No

Within the area overlying a subsurface mine. (**Does not apply to below grade tanks**)

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

Yes  No

Within an unstable area. (**Does not apply to below grade tanks**)

- 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. (**Does not apply to below grade tanks**)

- FEMA map

Yes  No

### Below Grade Tanks

Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

Yes  No

Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

Yes  No

**Temporary Pit using Low Chloride Drilling Fluid** (maximum chloride content 15,000 mg/liter)

Within 100 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). (Applies to low chloride temporary pits.)

- Topographic map; Visual inspection (certification) of the proposed site

Yes  No

Within 300 feet from a occupied 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 200 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 300feet of any other fresh water well or spring, in 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 100 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

Yes  No

**Temporary Pit Non-low chloride drilling fluid**

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

**Permanent Pit or Multi-Well Fluid Management Pit**

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 H<sub>2</sub>S, 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.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Ground water is between 25-50 feet below the bottom of the buried waste<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Ground water is more than 100 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells  | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> 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).<br>- Topographic map; Visual inspection (certification) of the proposed site                        | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image  | <input type="checkbox"/> Yes <input type="checkbox"/> 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.<br>- NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Written confirmation or verification from the municipality; Written approval obtained from the municipality   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 300 feet of a wetland.<br>US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance   | <input type="checkbox"/> Yes <input type="checkbox"/> 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.

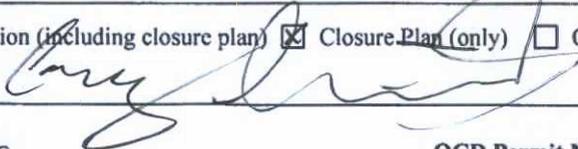
Name (Print): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

e-mail address: \_\_\_\_\_ Telephone: \_\_\_\_\_

18.

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

OCD Representative Signature:  Approval Date: 6/6/16

Title: Environmental Spec 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: 4-26-2016

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

**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): Kurt Hoekstra Title: EHS Coordinator

Signature:  Date: 4-26-2016

e-mail address: Kurt\_Hoekstra@xtocenergy.com Telephone: 505-333-3100

District I  
1625 N. French Dr., Hobbs, NM 88240  
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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

Form C-141  
Revised August 8, 2011

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

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: Kurt Hoekstra
Address: 382 Road 3100, Aztec, New Mexico 87410	Telephone No.: (505) 333-3100
Facility Name: Little Stinker # 1	Facility Type: Gas Well (Basin Dakota)

Surface Owner: Federal	Mineral Owner	API No. 30-045-25532
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**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
J	11	30N	12W	11560	FSL	1850	FEL	San Juan

Latitude: 36.823549 Longitude: -108.065345

**NATURE OF RELEASE**

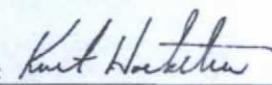
Type of Release: N/A	Volume of Release: N/A	Volume Recovered: N/A
Source of Release: N/A	Date and Hour of Occurrence N/A	Date and Hour of Discovery: N/A
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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 removed at the Little Stinker # 1 well site due to P & A of the well site. The BGT cellar beneath the BGT was sampled for TPH via USEPA Method 8015M C6-C36, for BTEX via USEPA Method 8021, and for total chlorides. The sample returned results below the 'pit rule' standards of 100 ppm TPH, 0.2 ppm benzene, 50 ppm total BTEX, and 250 ppm chlorides, confirming that a release has not occurred at this location.

Describe Area Affected and Cleanup Action Taken.\*No release has been confirmed at this location and no further action is required.

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: 	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Kurt Hoekstra	Approved by Environmental Specialist:	
Title: EHS Coordinator	Approval Date:	Expiration Date:
E-mail Address: Kurt.Hoekstra@xtoenergy.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 4-26-2016 Phone: 505-333-3100		

\* Attach Additional Sheets If Necessary

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

**Lease Name:** Little Stinker # 1

**API No.:** 30-045-25532

**Description:** Unit J, Section 11, 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 close below-grade tanks within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the division requires because of imminent danger to fresh water, public health or the environment.  
**Closure Date is April 26<sup>th</sup>, 2016**
  
2. XTO will close a below-grade tank that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years after June 16, 2008, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC.  
**Closure Date is April 26<sup>th</sup>, 2016**
  
3. XTO will close a permitted below-grade tank within 60 days of cessation of the below-grade tank's operation or as required by the transitional provisions of Subsection B of 19.15.17.17 NMAC in accordance with a closure plan that the appropriate division district office approves. The closure report will be filed on form C-144.  
**Required C-144 Form is attached to this document.**
  
4. 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:
  - Envirotech Permit No. NM01-0011 and IEI Permit No. NM 01-0010B
    - Soil contaminated by exempt petroleum hydrocarbons
    - Produced sand, pit sludge and contaminated bottoms from storage of exempt wastes
  - Basin Disposal Permit No. NM01-005
    - Produced water**All liquids and sludge were removed from the tank prior to closure activities.**
  
5. 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.  
**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.**

6. XTO will remove any on-site equipment associated with a below-grade tank unless the equipment is required for some other purpose.

**The below grade tank has been removed due to P & A of the Little Stinker # 1 well site.**

7. XTO will test the soils beneath the below-grade tank to determine whether a release has occurred. At a minimum 5 point composite sample will be collected along with individual grab samples from any area that is wet, discolored or showing other evidence of a release. Samples will be analyzed for BTEX, TPH and chlorides to demonstrate that the benzene concentration, as determined by EPA SW-846 methods 8021B or 8260B or EPA method that the division approves, does not exceed 0.2 mg/kg; total BTEX concentration, as determined by EPA SW-846 methods 8021B or 8260B or other EPA method that the division approves, does not exceed 50 mg/kg; the TPH concentration, as determined by EPA method 418.1 or other EPA method that the division approves, does not exceed 100mg/kg; and the chloride concentration, as determined by EPA method 300.1 or other EPA method that the division approves, does not exceed 250 mg/kg, or the background concentration, whichever is greater. XTO will notify the division of its results on form C-141.

**A composite sample was taken of the pit using sampling tools and all samples tested per Subsection B of 19.15.17.1 3(B)( 1 )(b). (Sample results attached).**

Components	Test Method	Limit (mg/Kg)	Results (mg/Kg)
Benzene	EPA SW-846 8021B or 8260B	0.2	< 0.047mg/kg
BTEX	EPA SW-846 8021B or 8260B	50	< 0.234 mg/kg
TPH	EPA 8015M	100	62.2 mg/kg
Chloride	Method 300.0	250	120 mg/kg

8. If XTO or the division determines that a release has occurred, XTO will comply with 19.15.3.116 NMAC and 19.15.1.19NMAC as appropriate.  
**No release has been confirmed for this location.**
9. If the sampling program demonstrates that a release has not occurred or that any release does not exceed the concentrations specified in Paragraph (4) of Subsection E of 19.15.17.13 NMAC, XTO will backfill the excavation with compacted, non-waste containing, earthen material; construct a division prescribed soil cover; recontour and re-vegetate the site.  
**The pit cellar excavation was backfilled using compacted, non-waste containing earthen material, with a division prescribed soil cover.**
10. Notice of Closure operations will be given to the Aztec Division District III office between 72 hours and one week prior to the start of closure activities via email or verbally.  
The notification will include the following:
- i. Operator's name
  - ii. Well Name and API Number
  - iii. Location by Unit Letter, Section, Township, and Range
- Notification was provided to Mr. Cory Smith with the Aztec office of the OCD via email on December 1<sup>st</sup>, 2015; see attached email printout.**

The surface owner shall be notified of XTO's proposal to close the BGT as per the approved closure plan using certified mail, return receipt requested.

**The surface owner was notified on December 1<sup>st</sup>, Email has been approved as a means of surface owner notification to the BLM by Brandon Powell, NMOCD Aztec Office.**

11. Re-contouring of location will match fit, shape, line, form and texture of the surrounding area. Re-shaping will include drainage control, prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be placed in areas where needed to prevent erosion on a large scale. Final re-contour shall have a uniform appearance with smooth surface, fitting the natural landscape.  
**The location has been recontoured to match the above specifications after the well was P & A'd.**
12. A minimum of 4 feet of cover shall be achieved and the cover shall include 1 foot of suitable material to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.  
**The site has been backfilled to match these specifications.**
13. XTO will seed the disturbed areas the first growing season after the operator closes the pit. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved methods. BLM or Forest Service stipulated seed mixes will be used on federal lands. Vegetative cover will equal 70% of the native perennial vegetative cover (un-impacted) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintain that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs.  
**The location has been reclaimed pursuant to BLM/OCD specifications**
14. All closure activities will include proper documentation and be available for review upon request and will be submitted in closure report form to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on form C-144 and incorporate the following:
  - i. Proof of closure notice to division and surface owner; **attached**
  - ii. Details on capping and covering, where applicable;  
**per BLM/OCD Specifications**
  - iii. Inspection reports; **attached**
  - iv. Confirmation sampling analytical results; **attached**
  - v. Disposal facility name(s) and permit number(s); **see above**
  - vi. Soil backfilling and cover installation; **per BLM/OCD Specifications**
  - vii. Re-vegetation application rates and seeding techniques, (or approved alternative to re-vegetation requirements if applicable); **per BLM/OCD specifications**
  - viii. Photo documentation of the site reclamation. **attached**



Hall Environmental Analysis Laboratory  
4901 Hawkins NE  
Albuquerque, NM 87109  
TEL: 505-345-3975 FAX: 505-345-4107  
Website: [www.hallenvironmental.com](http://www.hallenvironmental.com)

March 22, 2016

James McDaniel  
XTO Energy  
382 County Road 3100  
Aztec, NM 87410  
TEL: (505) 787-0519  
FAX (505) 333-3280

RE: Little Stinker #1

OrderNo.: 1512349

Dear James McDaniel:

Hall Environmental Analysis Laboratory received 1 sample(s) on 12/8/2015 for the analyses presented in the following report.

This report is a revised report and it replaces the original report issued December 15, 2015.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to [www.hallenvironmental.com](http://www.hallenvironmental.com) or the state specific web sites. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. All samples are reported as received unless otherwise indicated.

Please don't hesitate to contact HEAL for any additional information or clarifications.

Sincerely,

A handwritten signature in black ink, appearing to read 'Andy Freeman', is written over a light blue horizontal line.

Andy Freeman  
Laboratory Manager  
4901 Hawkins NE  
Albuquerque, NM 87109

**Hall Environmental Analysis Laboratory, Inc.**

CLIENT: XTO Energy

Client Sample ID: Little Stinker #1

Project: Little Stinker #1

Collection Date: 12/7/2015 9:30:00 AM

Lab ID: 1512349-001

Matrix: SOIL

Received Date: 12/8/2015 8:00:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: LGT
Chloride	120	30		mg/Kg	20	12/14/2015 10:55:27 AM	22792
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>							Analyst: KJH
Diesel Range Organics (DRO)	ND	9.5		mg/Kg	1	12/10/2015 4:10:53 PM	22675
Motor Oil Range Organics (MRO)	ND	48		mg/Kg	1	12/10/2015 4:10:53 PM	22675
Surr: DNOP	95.2	70-130		%Rec	1	12/10/2015 4:10:53 PM	22675
<b>EPA METHOD 8015D: GASOLINE RANGE</b>							Analyst: NSB
Gasoline Range Organics (GRO)	ND	4.7		mg/Kg	1	12/9/2015 5:55:14 PM	22678
Surr: BFB	97.2	66.2-112		%Rec	1	12/9/2015 5:55:14 PM	22678
<b>EPA METHOD 8021B: VOLATILES</b>							Analyst: NSB
Benzene	ND	0.047		mg/Kg	1	12/9/2015 5:55:14 PM	22678
Toluene	ND	0.047		mg/Kg	1	12/9/2015 5:55:14 PM	22678
Ethylbenzene	ND	0.047		mg/Kg	1	12/9/2015 5:55:14 PM	22678
Xylenes, Total	ND	0.093		mg/Kg	1	12/9/2015 5:55:14 PM	22678
Surr: 4-Bromofluorobenzene	122	80-120	S	%Rec	1	12/9/2015 5:55:14 PM	22678

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:			
*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
D	Sample Diluted Due to Matrix	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1512349

22-Mar-16

Client: XTO Energy  
Project: Little Stinker #1

Sample ID	MB-22792	SampType:	MBLK	TestCode:	EPA Method 300.0: Anions					
Client ID:	PBS	Batch ID:	22792	RunNo:	30847					
Prep Date:	12/14/2015	Analysis Date:	12/14/2015	SeqNo:	942483	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-22792	SampType:	LCS	TestCode:	EPA Method 300.0: Anions					
Client ID:	LCSS	Batch ID:	22792	RunNo:	30847					
Prep Date:	12/14/2015	Analysis Date:	12/14/2015	SeqNo:	942484	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	92.6	90	110			

**Qualifiers:**

- \* Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- JD Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

**QC SUMMARY REPORT**  
**Hall Environmental Analysis Laboratory, Inc.**

WO#: 1512349

22-Mar-16

**Client:** XTO Energy  
**Project:** Little Stinker #1

Sample ID	MB-22675	SampType:	MBLK	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	PBS	Batch ID:	22675	RunNo:	30744					
Prep Date:	12/9/2015	Analysis Date:	12/10/2015	SeqNo:	939460	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Motor Oil Range Organics (MRO)	ND	50								
Surr: DNOP	11		10.00		109	70	130			

Sample ID	LCS-22675	SampType:	LCS	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	LCSS	Batch ID:	22675	RunNo:	30744					
Prep Date:	12/9/2015	Analysis Date:	12/10/2015	SeqNo:	939461	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	54	10	50.00	0	109	57.4	139			
Surr: DNOP	5.6		5.000		112	70	130			

**Qualifiers:**

- \* Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

**QC SUMMARY REPORT**  
**Hall Environmental Analysis Laboratory, Inc.**

WO#: 1512349

22-Mar-16

**Client:** XTO Energy  
**Project:** Little Stinker #1

Sample ID	MB-22678	SampType:	MBLK	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	PBS	Batch ID:	22678	RunNo:	30727					
Prep Date:	12/8/2015	Analysis Date:	12/9/2015	SeqNo:	938888	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	870		1000		87.4	66.2	112			

Sample ID	LCS-22678	SampType:	LCS	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	LCSS	Batch ID:	22678	RunNo:	30727					
Prep Date:	12/8/2015	Analysis Date:	12/9/2015	SeqNo:	938889	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	21	5.0	25.00	0	83.6	79.6	122			
Surr: BFB	1100		1000		107	66.2	112			

**Qualifiers:**

- \* Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ID Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1512349

22-Mar-16

**Client:** XTO Energy  
**Project:** Little Stinker #1

Sample ID	MB-22678	SampType:	MBLK	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	PBS	Batch ID:	22678	RunNo:	30727					
Prep Date:	12/8/2015	Analysis Date:	12/9/2015	SeqNo:	938921	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.050								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	1.1		1.000		114	80	120			

Sample ID	LCS-22678	SampType:	LCS	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	LCSS	Batch ID:	22678	RunNo:	30727					
Prep Date:	12/8/2015	Analysis Date:	12/9/2015	SeqNo:	938922	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.88	0.050	1.000	0	87.8	80	120			
Toluene	0.88	0.050	1.000	0	88.5	80	120			
Ethylbenzene	0.95	0.050	1.000	0	95.1	80	120			
Xylenes, Total	2.7	0.10	3.000	0	91.2	80	120			
Surr: 4-Bromofluorobenzene	1.3		1.000		134	80	120			S

**Qualifiers:**

- \* Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

**Sample Log-In Check List**

Client Name: XTO Energy

Work Order Number: 1512349

RcptNo: 1

Received by/date: JA 12/08/15

Logged By: Anne Thorne 12/8/2015 8:00:00 AM

*Anne Thorne*

Completed By: Anne Thorne 12/8/2015

*Anne Thorne*

Reviewed By: IO 12/08/15

**Chain of Custody**

- 1. Custody seals intact on sample bottles? Yes  No  Not Present
- 2. Is Chain of Custody complete? Yes  No  Not Present
- 3. How was the sample delivered? Courier

**Log In**

- 4. Was an attempt made to cool the samples? Yes  No  NA
- 5. Were all samples received at a temperature of >0° C to 6.0°C Yes  No  NA
- 6. Sample(s) in proper container(s)? Yes  No
- 7. Sufficient sample volume for indicated test(s)? Yes  No
- 8. Are samples (except VOA and ONG) properly preserved? Yes  No
- 9. Was preservative added to bottles? Yes  No  NA
- 10. VOA vials have zero headspace? Yes  No  No VOA Vials
- 11. Were any sample containers received broken? Yes  No
- 12. Does paperwork match bottle labels? Yes  No   
(Note discrepancies on chain of custody)
- 13. Are matrices correctly identified on Chain of Custody? Yes  No
- 14. Is it clear what analyses were requested? Yes  No
- 15. Were all holding times able to be met? Yes  No   
(If no, notify customer for authorization.)

# of preserved bottles checked for pH: \_\_\_\_\_  
 (<2 or >12 unless noted)  
 Adjusted? \_\_\_\_\_  
 Checked by: \_\_\_\_\_

**Special Handling (if applicable)**

- 16. Was client notified of all discrepancies with this order? Yes  No  NA

Person Notified:	_____	Date:	_____
By Whom:	_____	Via:	<input type="checkbox"/> eMail <input type="checkbox"/> Phone <input type="checkbox"/> Fax <input type="checkbox"/> In Person
Regarding:	_____		
Client Instructions:	_____		

17. Additional remarks:

**18. Cooler Information**

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	1.0	Good	Yes			



## Hoekstra, Kurt

---

**From:** Hoekstra, Kurt  
**Sent:** Tuesday, December 01, 2015 7:50 AM  
**To:** Katherina Diemer (kdiemer@blm.gov)  
**Subject:** FW: BGT Closure Little Stinker # 1

---

**From:** Hoekstra, Kurt  
**Sent:** Tuesday, December 01, 2015 7:44 AM  
**To:** Smith, Cory, EMNRD; Mark Kelly ([mkelly@blm.gov](mailto:mkelly@blm.gov))  
**Cc:** McDaniel, James ([James\\_McDaniel@xtoenergy.com](mailto:James_McDaniel@xtoenergy.com)); Hixon, Logan; Farnsworth, Rex; Naegele, Otto; Clement, Jeff; Dawes, Thomas; Trujillo, Marcos  
**Subject:** BGT Closure Little Stinker # 1

Mr. Smith and Ms. Diemer ,

Please accept this email as the required 72 hour notification for BGT closure activities at the Little Stinker # 1 well site (30-045-25532) located in Section 11, Township 30N, Range 12W, San Juan County, New Mexico. This BGT is being closed due to the P & A of this location. Work is tentatively scheduled for Monday December 7, 2015 at approximately 9:00 am.

Thank you for your time in regards to this matter.

Kurt Hoekstra  
EHS Coordinator  
XTO Energy  
505-333-3202 Office  
505-486-9543 Cell  
[Kurt\\_Hoekstra@xtoenergy.com](mailto:Kurt_Hoekstra@xtoenergy.com)  
An ExxonMobil Subsidiary

## Hoekstra, Kurt

---

**From:** Hoekstra, Kurt  
**Sent:** Tuesday, December 01, 2015 7:44 AM  
**To:** Smith, Cory, EMNRD; Mark Kelly (mkelly@blm.gov)  
**Cc:** McDaniel, James (James\_McDaniel@xtoenergy.com); Hixon, Logan; Farnsworth, Rex; Naegele, Otto; Clement, Jeff; Dawes, Thomas; Trujillo, Marcos  
**Subject:** BGT Closure Little Stinker # 1

Mr. Smith and Mr. Kelly ,

Please accept this email as the required 72 hour notification for BGT closure activities at the Little Stinker # 1 well site (30-045-25532) located in Section 11, Township 30N, Range 12W, San Juan County, New Mexico. This BGT is being closed due to the P & A of this location. Work is tentatively scheduled for Monday December 7, 2015 at approximately 9:00 am.

Thank you for your time in regards to this matter.

Kurt Hoekstra  
EHS Coordinator  
XTO Energy  
505-333-3202 Office  
505-486-9543 Cell  
[Kurt\\_Hoekstra@xtoenergy.com](mailto:Kurt_Hoekstra@xtoenergy.com)  
An **ExxonMobil** Subsidiary



WELLBORE LEAK INSPECTION REPORT

Division Denver  
 Dates 06/01/2008 - 12/01/2015  
 Type Route Stop  
 Type Value L

RouteName	StopName	Pumper	Foreman	WellName	APNWellNumber	Section	Range	Township	InspectorName	Inspection Date	Inspection Time	Visible Liner Tears	Visible Tank Leak Overflow	Collection Oil Surface Run	Visible Layer Oil	Visible Leak	Freeboard Est FT	Pit Location	Pit Type	Notes
DEN NM Run 57	LITTLE STINKER 001	Serrano, Bryan	Morrow, Pete	LITTLE STINKER 01	3004525532	11	12W	30N												
									mb	06/27/2008	02:30	No	No	No	No	No	5			
									mb	09/19/2008	11:15	No	No	No	No	No	5			
									mb	10/25/2008	11:00	No	No	No	No	No	5	Well Water Pit	Below Ground	
									sd	11/15/2008	09:10	No	No	No	No	No	5	Well Water Pit	Above Ground	
									sd	12/13/2008	12:50	No	No	No	No	No	5	Well Water Pit	Above Ground	
									sd	01/29/2009	08:30	No	No	No	No	No	5	Well Water Pit	Above Ground	
									sd	02/07/2009	14:50	No	No	No	No	No	5	Well Water Pit	Above Ground	
									sd	03/10/2009	12:10	No	No	No	No	No	5	Well Water Pit	Above Ground	
									sd	05/25/2009	13:00	No	No	No	No	No	5	Well Water Pit	Above Ground	
									sd	06/13/2009	11:25	No	No	No	No	No	5	Well Water Pit	Above Ground	
									sd	03/29/2010	11:00	No	No	No	No	No	5	Well Water Pit	Above Ground	
									SCOTT JOHNSON	04/28/2010	11:00	No	No	No	No	No	5	Well Water Pit	Above Ground	
									SCOTT JOHNSON	10/28/2010	11:00	No	No	No	No	No	5	Well Water Pit	Above Ground	
									SCOTT JOHNSON	11/19/2010	11:00	No	No	No	No	No	5	Well Water Pit	Above Ground	
									SCOTT JOHNSON	05/08/2012	14:10	No	No	No	No	No	15	Well Water Pit	Above Ground	
									MTH	06/04/2012	11:32	No	No	No	No	No	17	Well Water Pit	Above Ground	
									MTH	07/03/2012	12:37	No	No	No	No	No	15	Well Water Pit	Above Ground	
									MTH	08/08/2012	11:19	No	No	No	No	No	17	Well Water Pit	Above Ground	
									MTH	09/05/2012	9:54	No	No	No	Yes	No	12	Well Water Pit	Above Ground	
									MTH	10/04/2012	10:32	No	No	No	Yes	No	10	Well Water Pit	Above Ground	
									B.S.	11/15/2012	14:11	No	No	No	Yes	No	10	Well Water Pit	Above Ground	
									B.S.	12/31/2012	14:11	No	No	No	Yes	No	10	Well Water Pit	Above Ground	
									B.S.	02/26/2013	10:49	No	No	No	Yes	No	2	Well Water Pit	Above Ground	
									B.S.	03/29/2013	11:02	No	No	No	Yes	No	10	Well Water Pit	Above Ground	
									B.S.	04/04/2013	11:36	No	No	No	Yes	No	10	Well Water Pit	Above Ground	
									B.S.	05/01/2013	15:43	No	No	No	Yes	No	9	Well Water Pit	Above Ground	
									B.S.	06/03/2013	15:21	No	No	No	Yes	No	10	Well Water Pit	Above Ground	
									B.S.	07/02/2013	15:21	No	No	No	Yes	No	9	Well Water Pit	Above Ground	
									B.S.	08/01/2013	8:21	No	No	No	Yes	No	10	Well Water Pit	Above Ground	
									B.S.	09/03/2013	10:21	No	No	No	Yes	No	15	Well Water Pit	Above Ground	
									B.S.	11/01/2013	9:02	No	No	No	Yes	No	15	Well Water Pit	Above Ground	
									B.S.	12/02/2013	8:12	No	No	No	Yes	No	14	Well Water Pit	Above Ground	
									B.S.	01/02/2014	12:45	No	No	No	Yes	No	12	Well Water Pit	Above Ground	
									B.S.	02/03/2014	7:45	No	No	No	Yes	No	15	Well Water Pit	Above Ground	
									B.S.	03/03/2014	8:25	No	No	No	Yes	No	15	Well Water Pit	Above Ground	
									B.S.	04/01/2014	1:47	No	No	No	Yes	No	10	Well Water Pit	Above Ground	
									B.S.	05/01/2014	9:47	No	No	No	Yes	No	14	Well Water Pit	Above Ground	
									B.S.	06/02/2014	8:35	No	No	No	Yes	No	14	Well Water Pit	Above Ground	
									B.S.	07/01/2014	8:35	No	No	No	Yes	No	12	Well Water Pit	Above Ground	
									B.S.	08/01/2014	11:35	No	No	No	Yes	No	10	Well Water Pit	Above Ground	
									B.S.	09/08/2014	8:39	No	No	No	Yes	No	15	Well Water Pit	Above Ground	
									B.S.	11/01/2015	10:45	No	No	No	Yes	No	15	Well Water Pit	Above Ground	

January 27, 2015

Mr. Cory Smith  
Oil Conservation Division  
1000 Rio Brazos Rd.  
Aztec, New Mexico 87410

Email: cory.smith@state.nm.us  
Phone (505) 334-6178 Ext 115

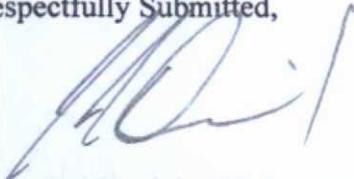
**RE: VARIANCE REQUEST FOR 19.15.17 NMAC TABLE I AND TABLE II**

Mr. Smith,

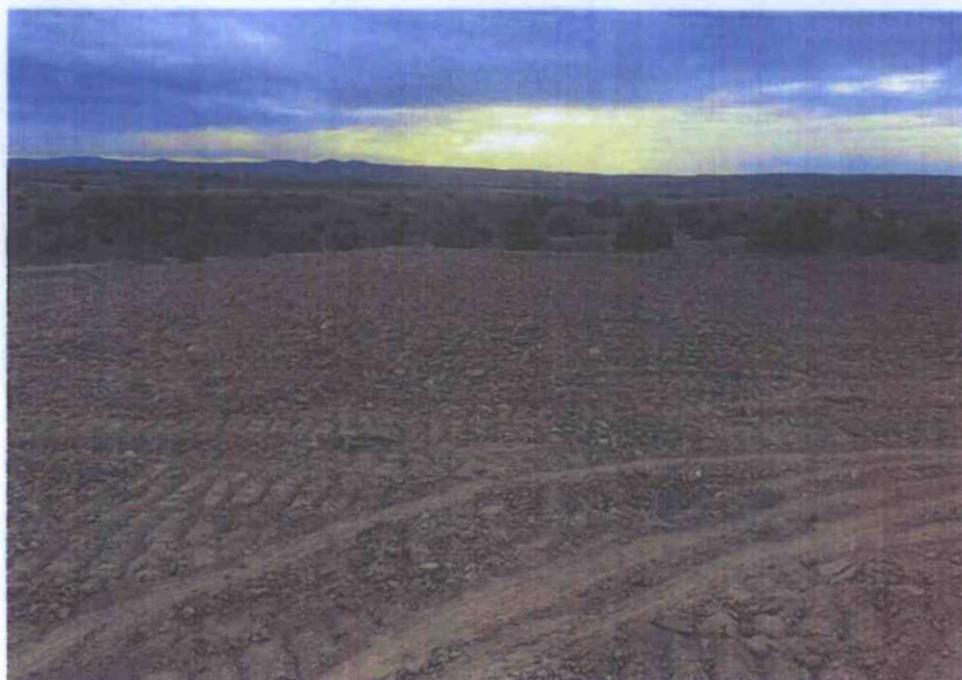
Please accept this letter as a variance request as outlined in 19.15.17.15(A) NMAC. XTO Energy would like to request the replacement of USEPA Method 418.1 for the analysis of Total Petroleum Hydrocarbons (TPH) for USEPA Method 8015M, measuring carbon ranges C6-C36, for all sampling associated with closures and confirmations samples in relation to 19.15.17 NMAC, both in Table I and Table II (2103) and the 'pit rule' passed in 2008.

XTO Energy is requesting this variance on the grounds that USEPA Method 418.1 is an outdated analytical method that reports a full range of hydrocarbons from C<sub>8</sub> through C<sub>40</sub>. (*Reference: American Petroleum Institute*). The attached table demonstrates the carbon ranges, and the typical hydrocarbon products that can be found in those ranges. As you can see, lube oil ranges from C<sub>28</sub>-C<sub>35</sub>. Analytical Method USEPA 418.1 extends past lube oils from C<sub>35</sub> through C<sub>40</sub>. This range of hydrocarbons is above the range that can reasonably be expected to be found in our field in both drilling pits and beneath below grade tanks. USEPA Method 8015M (GRO/DRO + extended analysis) will report hydrocarbons ranging from C<sub>6</sub>-C<sub>10</sub> for GRO, C<sub>10</sub>-C<sub>28</sub> for DRO, and C<sub>28</sub>-C<sub>36</sub> for extended analysis. This information was provided by Environmental Science Corporation Laboratories. As the information demonstrates, the 8015M analytical method reports as low as C<sub>6</sub>, reporting lower than USEPA Method 418.1. Utilizing analytical method 8015M, lighter range hydrocarbons will be reported instead of higher range, heavy hydrocarbons that may not be reasonably expected to be found in our field. Utilization of USEPA Method 8015M will better protect groundwater resources by identifying lighter, more mobile hydrocarbons that USEPA Method 418.1 cannot identify. The heavier range hydrocarbons, C<sub>36</sub>-C<sub>40</sub>, that are not identified by USEPA Method 8015M are not a mobile form of hydrocarbon, and are not a threat to human health and the environment. With your acceptance of this variance request, XTO Energy will begin utilizing USEPA Method 8015M in place of USEPA Method 418.1 for all sampling activities associated with 19.15.17 NMAC, both from the rules passed in 2008 and 2013.

Respectfully Submitted,



James McDaniel, CHMM #15676  
EH&S Supervisor  
XTO Energy, Inc.  
Western Division



**XTO ENERGY INC.**

**LITTLE STINKER #1**

Latitude Longitude  
N36°49.4 W108°03.8

**1560' FSL 1850' FEL  
UNIT J SEC. 11 T030N R012W  
API NO. 30-045-2553200  
SAN JUAN COUNTY, NEW MEXICO**

