

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

OIL CONS. DIV DIST. 3

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

16087

**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: LC Kelley #2E  
API Number: 30-045-25350 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr I Section 05 Township 30N Range 12W County: San Juan  
Center of Proposed Design Latitude 36.83888 Longitude 108.11476 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 Visible sidewalls, vaulted, automatic high-level shut off  
Liner type: Thickness \_\_\_\_\_  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: Four foot height, steel mesh field fence (hogwire) with pipe top rail.

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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 an 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 300 feet 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. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <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). - 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. - 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. - 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. 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: Vanessa [Signature] Approval Date: 11/7/2017

Title: Environmental Specialist 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: August, 29 2017

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): Otto G. Naegele Jr. Title: EHS Technician

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

e-mail address: otto\_naegele@xtoenergy.com Telephone: 505-333-3100

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1625 N. French Dr., Hobbs, NM 88240  
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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: Otto Naegele
Address: 382 Road 3100, Aztec, New Mexico 87410	Telephone No.: (505) 333-3100
Facility Name: LC Kelley #2E	Facility Type: Gas Well
Surface Owner: Federal	Mineral Owner
API No.: 30-045-25350	

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
I	05	30N	12W	1660	FSL	790	FEL	San Juan

**Latitude 36.83888 Longitude 108.11476**

**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? N/A	
By Whom?	Date and Hour:	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

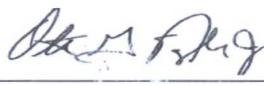
If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\* The below grade tank was removed at the LC Kelley #2E well site due to facility upgrades at the well site. The BGT cellar beneath the BGT was sampled for TPH via USEPA Method 8015, 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.

OIL CONSERVATION DIVISION

Signature: 	Approved by Environmental Specialist:	
Printed Name: Otto G. Naegele Jr.		
Title: EHS Technician	Approval Date:	Expiration Date:
E-mail Address: otto_naegele@xtoenergy.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: Phone: 505-333-3100		

\* Attach Additional Sheets If Necessary

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

**Lease Name:** LC Kelley #2E

**API No.:** 30-045- 25350

**Description:** Unit I, Section 05, 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 08/29/2017**
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 08/29/2017**
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.

**All equipment will stay on site due to facility upgrade of the LC Kelley #2E 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 five point 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
Benzene	EPA SW-846 8021B or 8260B	0.2	<0.10 mg/kg
BTEX	EPA SW-846 8021B or 8260B	50	<0.40 mg/kg
TPH	8015	100	< 170mg/kg
Chlorides	EPA 300.1	250 or background	<20.0 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 at 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 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 August 17, 2017; 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 August 17,2017 via email. Email has been approved as a means of surface owner notification to the BLM by Cory Smith, 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.**
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.  
**Site will be reclaimed at time of P&A per BLM MOU.**
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 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 OCD Specifications**
  - vii. Re-vegetation application rates and seeding techniques, (or approved alternative to re-vegetation requirements if applicable); **Per BLM MOU.**
  - viii. Photo documentation of the site reclamation. **attached**



## Analytical Report

### Report Summary

Client: XTO Energy Inc.

Chain Of Custody Number:

Samples Received: 8/22/2017 1:20:00PM

Job Number: 98031-0528

Work Order: P708063

Project Name/Location: LC Kelly 2E

Report Reviewed By:

Date: 8/24/17

Walter Hinchman, Laboratory Director

Date: 8/24/17

Tim Cain, Quality Assurance Officer

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.	Project Name:	LC Kelly 2E	Reported: 24-Aug-17 12:40
382 CR 3100	Project Number:	98031-0528	
Aztec NM, 87410	Project Manager:	James McDaniel	

### Analytical Report for Samples

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
Bgt Composite	P708063-01A	Soil	08/22/17	08/22/17	Glass Jar, 4 oz.

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XTO Energy Inc. 382 CR 3100 Aztec NM, 87410	Project Name: LC Kelly 2E Project Number: 98031-0528 Project Manager: James McDaniel	Reported: 24-Aug-17 12:40
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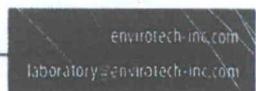
**Bgt Composite  
P708063-01 (Solid)**

Analyte	Result	Reporting							Notes	
		Limit	Units	Dilution	Batch	Prepared	Analyzed	Method		
<b><u>Volatile Organics by EPA 8021</u></b>										
Benzene	ND	0.10	mg/kg	1	1734014	08/22/17	08/23/17	EPA 8021B		
Toluene	ND	0.10	mg/kg	1	1734014	08/22/17	08/23/17	EPA 8021B		
Ethylbenzene	ND	0.10	mg/kg	1	1734014	08/22/17	08/23/17	EPA 8021B		
p,m-Xylene	ND	0.20	mg/kg	1	1734014	08/22/17	08/23/17	EPA 8021B		
o-Xylene	ND	0.10	mg/kg	1	1734014	08/22/17	08/23/17	EPA 8021B		
Total Xylenes	ND	0.10	mg/kg	1	1734014	08/22/17	08/23/17	EPA 8021B		
Total BTEX	ND	0.10	mg/kg	1	1734014	08/22/17	08/23/17	EPA 8021B		
<i>Surrogate: 4-Bromochlorobenzene-PID</i>		96.3 %		50-150	1734014	08/22/17	08/23/17	EPA 8021B		
<b><u>Nonhalogenated Organics by 8015</u></b>										
Gasoline Range Organics (C6-C10)	ND	20.0	mg/kg	1	1734014	08/22/17	08/23/17	EPA 8015D		
Diesel Range Organics (C10-C28)	ND	50.0	mg/kg	2	1734015	08/22/17	08/22/17	EPA 8015D		
Oil Range Organics (C28-C40+)	ND	100	mg/kg	2	1734015	08/22/17	08/22/17	EPA 8015D		
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>		97.3 %		50-150	1734014	08/22/17	08/23/17	EPA 8015D		
<i>Surrogate: n-Nonane</i>		87.2 %		50-200	1734015	08/22/17	08/22/17	EPA 8015D		
<b><u>Anions by 300.0</u></b>										
Chloride	ND	20.0	mg/kg	1	1734009	08/22/17	08/22/17	EPA 300.0		

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XTO Energy Inc. 382 CR 3100 Aztec NM, 87410	Project Name: LC Kelly 2E Project Number: 98031-0528 Project Manager: James McDaniel	Reported: 24-Aug-17 12:40
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**Volatile Organics by EPA 8021 - Quality Control**  
**Envirotech Analytical Laboratory**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 1734014 - Purge and Trap EPA 5030A**

Blank (1734014-BLK1) Prepared: 22-Aug-17 Analyzed: 23-Aug-17										
Benzene	ND	0.10	mg/kg							
Toluene	ND	0.10	"							
Ethylbenzene	ND	0.10	"							
p,m-Xylene	ND	0.20	"							
o-Xylene	ND	0.10	"							
Total Xylenes	ND	0.10	"							
Total BTEX	ND	0.10	"							
Surrogate: 4-Bromochlorobenzene-PID	7.68		"	8.00		96.1	50-150			

LCS (1734014-BS1) Prepared: 22-Aug-17 Analyzed: 23-Aug-17										
Benzene	4.49	0.10	mg/kg	5.00		89.9	70-130			
Toluene	4.53	0.10	"	5.00		90.7	70-130			
Ethylbenzene	4.57	0.10	"	5.00		91.5	70-130			
p,m-Xylene	9.10	0.20	"	10.0		91.0	70-130			
o-Xylene	4.46	0.10	"	5.00		89.3	70-130			
Total Xylenes	13.6	0.10	"	15.0		90.5	70-130			
Surrogate: 4-Bromochlorobenzene-PID	7.75		"	8.00		96.9	50-150			

Matrix Spike (1734014-MS1) Source: P708063-01 Prepared: 22-Aug-17 Analyzed: 23-Aug-17										
Benzene	4.53	0.10	mg/kg	5.00	ND	90.6	54.3-133			
Toluene	4.58	0.10	"	5.00	ND	91.6	61.4-130			
Ethylbenzene	4.62	0.10	"	5.00	ND	92.5	61.4-133			
p,m-Xylene	9.27	0.20	"	10.0	ND	92.7	63.3-131			
o-Xylene	4.51	0.10	"	5.00	ND	90.3	63.3-131			
Total Xylenes	13.8	0.10	"	15.0	ND	91.9	63.3-131			
Surrogate: 4-Bromochlorobenzene-PID	7.73		"	8.00		96.6	50-150			

Matrix Spike Dup (1734014-MSD1) Source: P708063-01 Prepared: 22-Aug-17 Analyzed: 23-Aug-17										
Benzene	4.38	0.10	mg/kg	5.00	ND	87.7	54.3-133	3.19	20	
Toluene	4.46	0.10	"	5.00	ND	89.3	61.4-130	2.59	20	
Ethylbenzene	4.52	0.10	"	5.00	ND	90.4	61.4-133	2.34	20	
p,m-Xylene	9.03	0.20	"	10.0	ND	90.4	63.3-131	2.58	20	
o-Xylene	4.41	0.10	"	5.00	ND	88.3	63.3-131	2.24	20	
Total Xylenes	13.4	0.10	"	15.0	ND	89.7	63.3-131	2.47	20	
Surrogate: 4-Bromochlorobenzene-PID	7.78		"	8.00		97.2	50-150			

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XTO Energy Inc. 382 CR 3100 Aztec NM, 87410	Project Name: LC Kelly 2E Project Number: 98031-0528 Project Manager: James McDaniel	Reported: 24-Aug-17 12:40
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**Nonhalogenated Organics by 8015 - Quality Control**  
**Envirotech Analytical Laboratory**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 1734014 - Purge and Trap EPA 5030A**

<b>Blank (1734014-BLK1)</b>		Prepared: 22-Aug-17 Analyzed: 23-Aug-17								
Gasoline Range Organics (C6-C10)	ND	20.0	mg/kg							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.80		"	8.00		97.5	50-150			
<b>LCS (1734014-BS1)</b>		Prepared: 22-Aug-17 Analyzed: 23-Aug-17								
Gasoline Range Organics (C6-C10)	54.1	20.0	mg/kg	60.9	ND	88.9	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.92		"	8.00		99.0	50-150			
<b>Matrix Spike (1734014-MS1)</b>		Source: P708063-01		Prepared: 22-Aug-17 Analyzed: 23-Aug-17						
Gasoline Range Organics (C6-C10)	54.6	20.0	mg/kg	60.9	ND	89.6	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.84		"	8.00		98.0	50-150			
<b>Matrix Spike Dup (1734014-MSD1)</b>		Source: P708063-01		Prepared: 22-Aug-17 Analyzed: 23-Aug-17						
Gasoline Range Organics (C6-C10)	54.5	20.0	mg/kg	60.9	ND	89.5	70-130	0.183	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	8.04		"	8.00		100	50-150			

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XTO Energy Inc. 382 CR 3100 Aztec NM, 87410	Project Name: LC Kelly 2E Project Number: 98031-0528 Project Manager: James McDaniel	Reported: 24-Aug-17 12:40
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**Nonhalogenated Organics by 8015 - Quality Control**  
**Envirotech Analytical Laboratory**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 1734015 - DRO Extraction EPA 3570**

<b>Blank (1734015-BLK1)</b>										
										Prepared & Analyzed: 22-Aug-17
Diesel Range Organics (C10-C28)	ND	25.0	mg/kg							
Oil Range Organics (C28-C40+)	ND	50.0	"							
Surrogate: n-Nonane	52.2		"	50.0		104	50-200			
<b>LCS (1734015-BS1)</b>										
										Prepared & Analyzed: 22-Aug-17
Diesel Range Organics (C10-C28)	453	25.0	mg/kg	500		90.6	38-132			
Surrogate: n-Nonane	51.1		"	50.0		102	50-200			
<b>Matrix Spike (1734015-MS1)</b>										
										Source: P708063-01 Prepared & Analyzed: 22-Aug-17
Diesel Range Organics (C10-C28)	477	50.0	mg/kg	500	ND	95.4	38-132			
Surrogate: n-Nonane	42.7		"	50.0		85.5	50-200			
<b>Matrix Spike Dup (1734015-MSD1)</b>										
										Source: P708063-01 Prepared & Analyzed: 22-Aug-17
Diesel Range Organics (C10-C28)	500	50.0	mg/kg	500	ND	100	38-132	4.76	20	
Surrogate: n-Nonane	45.1		"	50.0		90.2	50-200			

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XTO Energy Inc. 382 CR 3100 Aztec NM, 87410	Project Name: LC Kelly 2E Project Number: 98031-0528 Project Manager: James McDaniel	Reported: 24-Aug-17 12:40
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**Anions by 300.0 - Quality Control**  
**Envirotech Analytical Laboratory**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
<b>Batch 1734009 - Anion Extraction EPA 300.0</b>										
<b>Blank (1734009-BLK1)</b>				Prepared & Analyzed: 22-Aug-17						
Chloride	ND	20.0	mg/kg							
<b>LCS (1734009-BS1)</b>				Prepared & Analyzed: 22-Aug-17						
Chloride	257	20.0	mg/kg	250		103	90-110			
<b>Matrix Spike (1734009-MS1)</b>				Source: P708049-01		Prepared & Analyzed: 22-Aug-17				
Chloride	313	20.0	mg/kg	250	45.9	107	80-120			
<b>Matrix Spike Dup (1734009-MSD1)</b>				Source: P708049-01		Prepared & Analyzed: 22-Aug-17				
Chloride	311	20.0	mg/kg	250	45.9	106	80-120	0.693	20	

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XTO Energy Inc. 382 CR 3100 Aztec NM, 87410	Project Name: LC Kelly 2E Project Number: 98031-0528 Project Manager: James McDaniel	Reported: 24-Aug-17 12:40
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**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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## Hixon, Logan

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**From:** Hixon, Logan  
**Sent:** Thursday, August 17, 2017 5:50 PM  
**To:** Smith, Cory, EMNRD; Thomas, Leigh (l1thomas@blm.gov); Fields, Vanessa, EMNRD; BRANDON POWELL (brandon.powell@state.nm.us)  
**Cc:** McDaniel, James (James\_McDaniel@xtoenergy.com); Hoekstra, Kurt; Dawes, Thomas (Thomas\_Dawes@xtoenergy.com); Weaver, John (John\_Weaver@xtoenergy.com); Logan, Michael (Michael\_Logan@xtoenergy.com); Morrow, Pete (Pete\_Morrow@xtoenergy.com)  
**Subject:** 2017-8-17, 72 Hour BGT Closure Notification, 2017/8/20-2017/8/27, LC Kelly 2E (API: 30-045-25350)

All,

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

*-LC Kelly 2E (API 30-045-25350) located in Section 5 (I), Township 30N, Range 12W, and San Juan County, New Mexico.*

This BGT is being closed due to facility upgrades being made to this site.

The closure plan was approved on October 29, 2009.

Work is tentatively scheduled for Tuesday August 22, 2017 at approximately 1000 MST.

If there is any unforeseen delays in closure activities with this BGT and it will not be initiated within a week's time (August 27, 2017), a follow up email notification will be made for the change.

Thank you and have a good day

*If you have any questions do not hesitate to contact us.*

**Thank You!**

**EHS Coordinator**

Logan Hixon | 382 CR 3100 | Aztec, NM 87410 | ph: 505-333-3100 | Cell: 505-386 8018 |

Home: 505-320-6133 | [Logan\\_Hixon@xtoenergy.com](mailto:Logan_Hixon@xtoenergy.com)

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**XTO Energy Inc.  
San Juan Basin  
Below Grade Tank  
Variance Page**

In accordance with Rule 19.15.17.15 NMAC, the following outlines all variances that are being requested for below grade tanks at XTO facilities. All variances requested provide equal or better protection of fresh water, public health and the environment.

**Closure Requirements**

XTO requests a variance on rule 19.15.17.13.C(3)(a) NMAC which requires operators to analyze closure samples for the constituents listed in Table I of 19.15.17.13 NMAC. XTO instead requests to replace the USEPA analytical method 300.0 for total chloride to USEPA Method 9056. The SW846 9056 method Determination of Inorganic Anions By Ion Chromatography, from *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods*, which also contains methods for the analysis of groundwater, is customarily used to comply with RCRA regulations. EPA Method 300.0 Determination of Inorganic Anions by Ion Chromatography is taken from *Methods for Chemical Analysis of Waters and Wastes*, and includes test procedures that are approved for monitoring under the Safe Drinking Water Act (SDWA) and the National Pollutant Discharge Elimination System (NPDES). The Scope of Application for each method is the same, and both methods utilize ion chromatograph instrumentation. Following either procedure, steps for instrument calibration and data calculation are equivalent. Sample preservation, holding time, handling and storage is identical between the two methods. It is expected that data produced from either method should be consistent.

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*). 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.

XTO requests a variance on rule 19.15.17.13.E(2) requiring that operators notify the appropriate division office verbally AND in writing at least 72 hours prior to any closure operation. XTO instead requests that the verbal notification be waived, as suggested by the local division office. XTO will provide written notification to the division office in the form of an email at least 72 hours prior to beginning closure activities.

**Carbon Ranges of Typical Hydrocarbons**

<b>Hydrocarbon</b>	<b>Carbon Range</b>
Condensate	C2-C12
Aromatics	C5-C7
Gasoline	C7-C11
Kerosene	C6-C16
Diesel Fuel	C8-C21
Fuel Oil #1	C9-C16
Fuel Oil #2	C11-C20
Heating Oil	C14-C20
Lube Oil	C28-C35



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Route Name DENN Main St

StopName KELLY LC 002E

Pumper Samiro Bryan

Foreman Morrow, Pease

Well Name LC KELLY 002E

API Well Number 300625350

Section 5

Range 12W

Township 30N

Inspector Name	Record Date	Inspection Time	Visible Liner Tests	Visible Liner Tests	Visible Tank Leak Overflow	Collection Of Surface Run	Visible Oil	Visible Layer	Visible Leak	Feedback EST	Pit Location	Pit Type	Notes
dr	9/14/2008	01:48	No	No	No	No	Yes	No	No	2			
dr	9/9/2008	12:12	No	No	No	No	Yes	No	No	2			
dr	10/9/2008	09:30	No	No	No	No	Yes	No	No	3			oil to be skimmed
dr	11/11/2008	10:00	No	No	No	No	Yes	No	No	3			Well Water Pit Below Ground
dr	12/10/2008	10:28	No	No	No	No	Yes	No	No	4			oil to be skimmed
dr	1/5/2009	10:00	No	No	No	No	Yes	No	No	4			oil to be skimmed
ng	2/22/2009	12:36	No	No	No	No	Yes	No	No	4			Well Water Pit Below Ground
ng	3/6/2009	12:00	No	No	No	No	Yes	No	No	4			oil to be skimmed
ng	4/29/2009	02:58	No	No	No	No	Yes	No	No	4			oil to be skimmed
ng	5/16/2009	02:00	No	No	No	No	Yes	No	No	4			oil to be skimmed
ng	6/10/2009	10:46	No	No	No	No	Yes	No	No	4			oil to be skimmed
ng	7/22/2009	10:00	No	No	No	No	Yes	No	No	3			oil to be skimmed
ng	8/9/2009	10:00	No	No	No	No	Yes	No	No	4			oil to be skimmed
ng	9/9/2009	10:23	No	No	No	No	Yes	No	No	4			oil to be skimmed
ng	9/17/2009	10:00	No	No	No	No	Yes	No	No	4			oil to be skimmed
am	10/16/2009	09:00	No	No	No	No	Yes	No	No	4			oil to be skimmed
am	11/6/2009	03:20	No	No	No	No	No	No	No	3			water ran
am	12/11/2009	12:00	No	No	No	No	No	Yes	Yes	5			water ran
am	1/15/2010	11:25	No	No	No	No	No	Yes	Yes	3			water ran
am	2/13/2010	10:00	No	No	No	No	Yes	No	No	4			snow/water collection in
am	3/17/2010	11:15	No	No	No	No	Yes	No	No	4			cellar
ng	4/16/2010	11:00	No	No	No	No	Yes	No	No	4			snow/water collection in
ng	5/7/2010	11:00	No	No	No	No	Yes	No	No	3			cellar
ng	6/11/2010	02:30	No	No	No	No	Yes	No	No	4			Below Ground
ng	7/14/2010	02:30	No	No	No	No	Yes	No	No	4			Below Ground
ng	8/14/2010	09:59	No	No	No	No	Yes	No	No	2			Below Ground
ng	9/15/2010	01:46	No	No	No	No	Yes	No	No	4			Below Ground
nk	10/9/2010	12:45	No	No	No	No	Yes	No	No	3			Below Ground
nk	11/15/2010	12:45	No	No	No	No	Yes	No	No	3			Below Ground
ng	12/19/2010	12:34	No	No	No	No	Yes	No	No	4			Below Ground
ng	1/15/2011	12:45	No	No	No	No	Yes	No	No	4			Below Ground
lc	2/12/2011	12:40	No	No	No	No	Yes	No	No	4			snow/ice in cellar
ng	3/21/2011	12:40	No	No	No	No	Yes	No	No	4			Below Ground
ng	4/29/2011	12:40	No	No	No	No	Yes	No	No	3			Below Ground
ng	5/16/2011	12:40	No	No	No	No	Yes	No	No	4			Below Ground
ng	6/9/2011	11:40	No	No	No	No	Yes	No	No	4			Below Ground
ng	7/11/2011	01:40	No	No	No	No	Yes	No	No	4			Below Ground
ng	8/11/2011	01:40	No	No	No	No	Yes	No	No	3			Below Ground
ng	9/21/2011	01:40	No	No	No	No	Yes	No	No	4			Below Ground
ng	10/12/2011	01:40	No	No	No	No	Yes	No	No	3			Below Ground
ng	11/9/2011	01:40	No	No	No	No	Yes	No	No	4			Below Ground
ng	12/10/2011	12:00	No	No	No	No	Yes	No	No	4			Below Ground
ng	1/16/2012	12:00	No	No	No	No	Yes	No	No	4			Below Ground
ng	2/14/2012	12:00	No	No	No	No	Yes	No	No	4			Below Ground
ng	3/6/2012	12:00	No	No	No	No	Yes	No	No	4			Below Ground
ng	4/11/2012	12:00	No	No	No	No	Yes	No	No	3			Below Ground
dr	5/31/2012	12:15	No	No	No	No	Yes	No	No	4			Below Ground
dr	10/23/2012	10:53	No	No	No	No	Yes	No	No	3			Below Ground
dr	3/4/2013	11:55	No	No	No	No	Yes	No	No	3			Below Ground
dr	3/14/2014	11:15	No	No	No	No	Yes	No	No	3			Below Ground
dr	11/4/2015	13:13	No	No	No	No	Yes	No	No	3			Below Ground
dr	11/4/2015	12:47	No	No	No	No	Yes	No	No	3			Below Ground
dr	12/9/2015	09:29	No	No	No	No	Yes	No	No	3			Below Ground
dr	1/14/2016	16:00	No	No	No	No	Yes	No	No	3			Below Ground
dr	2/6/2016	10:30	No	No	No	No	Yes	No	No	3			Below Ground
dr	3/11/2016	10:00	No	No	No	No	Yes	No	No	3			Below Ground
dr	4/7/2016	13:59	No	No	No	No	Yes	No	No	3			Below Ground
dr	5/24/2016	09:00	No	No	No	No	Yes	No	No	3			Below Ground
dr	6/22/2016	13:30	No	No	No	No	Yes	No	No	3			Below Ground
dr	7/7/2016	13:55	No	No	No	No	Yes	No	No	4			Below Ground
dr	8/22/2016	12:05	No	No	No	No	Yes	No	No	4			Below Ground
dr	9/15/2016	10:05	No	No	No	No	Yes	No	No	4			Below Ground
dr	10/4/2016	11:29	No	No	No	No	Yes	No	No	4			Below Ground
dr	11/11/2016	12:13	No	No	No	No	Yes	No	No	4			Below Ground
dr	1/5/2017	09:22	No	No	No	No	Yes	No	No	4			Below Ground
dr	2/7/2017	11:36	No	No	No	No	Yes	No	No	3			Below Ground
dr	3/20/2017	11:15	No	No	No	No	Yes	No	No	4			Below Ground
dr	4/7/2017	10:27	No	No	No	No	Yes	No	No	4			Below Ground
dr	5/12/2017	13:30	No	No	No	No	Yes	No	No	4			Below Ground
dr	6/6/2017	10:00	No	No	No	No	Yes	No	No	4			Below Ground
dr	7/6/2017	12:24	No	No	No	No	Yes	No	No	3			Below Ground
dr	8/11/2017	09:34	No	No	No	No	Yes	No	No	4			Below Ground

