

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Department  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-144  
Revised June 6, 2013

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

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

OIL CONS. DIV DIST. 3

FEB 15 2019

- 16255
- 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

**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: Martin Gas Com B 1F

API Number: 30-045-34091 OCD Permit Number: \_\_\_\_\_

U/L or Qtr/Qtr H Section 31 Township 28N Range 10W County: San Juan

Center of Proposed Design: Latitude 36.621128 Longitude -107.932 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 \_\_\_\_\_ 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: Four foot height, steel mesh field fence (hogwire) with pipe top railing

6. r

**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

<p>Within 100 feet of a wetland.</p> <ul style="list-style-type: none"> <li>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><b><u>Temporary Pit Non-low chloride drilling fluid</u></b></p>	
<p>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).</p> <ul style="list-style-type: none"> <li>- Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <ul style="list-style-type: none"> <li>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>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;</p> <ul style="list-style-type: none"> <li>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 300 feet of a wetland.</p> <ul style="list-style-type: none"> <li>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><b><u>Permanent Pit or Multi-Well Fluid Management Pit</u></b></p>	
<p>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).</p> <ul style="list-style-type: none"> <li>- Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <ul style="list-style-type: none"> <li>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>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.</p> <ul style="list-style-type: none"> <li>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 500 feet of a wetland.</p> <ul style="list-style-type: none"> <li>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> 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:**

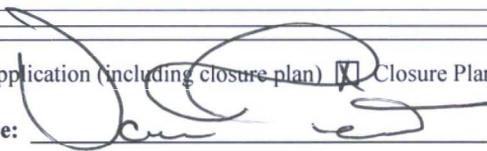
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

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: 2/23/2018

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: 1/5/18

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): Logan Hixon Title: EHS Coordinator

Signature:  Date: 2/12/18

e-mail address: [Logan.Hixon@xtoenergy.com](mailto:Logan.Hixon@xtoenergy.com) Telephone: 505-333-3100

District I  
1625 N. French Dr., Hobbs, NM 88240  
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1301 W. Grand Avenue, Artesia, NM 88210  
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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

For temporary pits, closed-loop systems, and below-grade tanks, submit to the appropriate NMOCD District Office.  
For permanent pits and exceptions submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

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### Pit, Closed-Loop System, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application

- Type of action:  Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method  
 Existing BGT  Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method  
 Modification to an existing permit  
 Closure plan only submitted for an existing permitted or non-permitted pit, closed-loop system, below-grade tank, or proposed alternative method

Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, 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 County Road 3100, Aztec, NM 87410  
 Facility or well name: MARTIN GAS COM # 1F  
 API Number: 30-045-34091 OCD Permit Number: \_\_\_\_\_  
 U/L or Qtr/Qtr H Section 31 Township 28N Range 10W County: San Juan  
 Center of Proposed Design: Latitude 36.621128 Longitude 107.932 NAD:  1927  1983  
 Surface Owner:  Federal  State  Private  Tribal Trust or Indian Allotment

2.  Pit: Subsection F or G of 19.15.17.11 NMAC  
 Temporary:  Drilling  Workover  
 Permanent  Emergency  Cavitation  P&A  
 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.  Closed-loop System: Subsection H of 19.15.17.11 NMAC  
 Type of Operation:  P&A  Drilling a new well  Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent)  
 Drying Pad  Above Ground Steel Tanks  Haul-off Bins  Other \_\_\_\_\_  
 Lined  Unlined Liner type: Thickness \_\_\_\_\_ mil  LLDPE  HDPE  PVC  Other \_\_\_\_\_  
 Liner Seams:  Welded  Factory  Other \_\_\_\_\_

4.  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, no liner  
 Liner type: Thickness \_\_\_\_\_ mil  HDPE  PVC  Other \_\_\_\_\_

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

6. **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 railing

7. **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)

8. **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 19.15.3.103 NMAC

9. **Administrative Approvals 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:

Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau office for consideration of approval.

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

10. **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. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to drying pads or above-grade tanks associated with a closed-loop system.*

Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. ( <i>Applies to temporary, emergency, or cavitation pits and below-grade tanks</i> ) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. ( <i>Applies to permanent pits</i> ) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 500 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 checked="" type="checkbox"/> No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

11.

**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: \_\_\_\_\_

12.

**Closed-loop Systems 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.

- Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9
- Siting Criteria Compliance Demonstrations (only for on-site closure) - 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: \_\_\_\_\_

Previously Approved Operating and Maintenance Plan API Number: \_\_\_\_\_ (Applies only to closed-loop system that use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)

13.

**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

14.

**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  Closed-loop System  
 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 (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

15.

**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 F 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 I of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

16.

**Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only: (19.15.17.13.D NMAC)**

*Instructions: Please identify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.*

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Will any of the proposed closed-loop system operations and associated activities occur on or in areas that *will not* be used for future service and operations?

Yes (If yes, please provide the information below)  No

*Required for impacted areas which will not be used for future service and operations:*

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 I of 19.15.17.13 NMAC

Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

17.

**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 may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.*

Ground water is less than 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 between 50 and 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
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 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	<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 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, 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
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. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 500 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 the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> No

18.

**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 F of 19.15.17.13 NMAC
- Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements 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 Subsection F of 19.15.17.13 NMAC
- Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F 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 I of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

19.

**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): Kim Champlin Title: Environmental Representative  
Signature: Kim Champlin Date: 11/21/08  
e-mail address: kim\_champlin@xtoenergy.com Telephone: (505) 333-3100

20.

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

OCD Representative Signature: Randee Ferguson Approval Date: 21Dec17  
Title: Hydrologist OCD Permit Number: na

21.

**Closure Report (required within 60 days of closure completion):** Subsection K of 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: \_\_\_\_\_

22.

**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.

23.

**Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:**

*Instructions: Please identify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.*

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Were the closed-loop system operations and associated activities performed on or in areas that will not be used for future service and operations?

Yes (If yes, please demonstrate compliance to the items below)  No

Required for impacted areas which will not be used for future service and operations:

- Site Reclamation (Photo Documentation)
- Soil Backfilling and Cover Installation
- Re-vegetation Application Rates and Seeding Technique

24.

**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)
- 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

25.

**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): \_\_\_\_\_ Title: \_\_\_\_\_  
Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
e-mail address: \_\_\_\_\_ Telephone: \_\_\_\_\_

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

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: Martin Gas Com B 1F	Facility Type: Gas Well

Surface Owner: Federal	Mineral Owner	API No.: 30-045-34091
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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
H	31	28N	10W	1740	FNL	1190	FEL	San Juan

**Latitude 36.83153 Longitude -108.10083**

**NATURE OF RELEASE**

Type of Release: Produced Water	Volume of Release: 52 BBL's	Volume Recovered: 20 BBL's
Source of Release: Pit Tank	Date and Hour of Occurrence: Time: Unknown	Date and Hour of Discovery: 12/21/2017 @1300
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Cory Smith/Vanessa Fields/Leigh Thomas (BLM), Brandon Powell (NMOCD)	
By Whom? Logan Hixon	Date and Hour: 12/22/2017-0809	
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.\* On December 21, 2017 an XTO lease operator noticed fluid in the cellar of the BGT. Approximately 52 bbls of produced water was released into the pit cellar. Of the approximate 52 bbls released, 20 bbls were recovered. It was found that the pit tank had an integrity failure and leaked produced water into the pit tank cellar. The site was then ranked according to the NMOCD Guidelines for the Remediation of Leaks, Spills and Releases. The site was ranked a 20 due to a distance to a drainage of less than 200'. This set the closure standard to 100 ppm TPH, 10 ppm benzene, and 50 ppm total BTEX. NMOCD/BLM were notified on 12/22/2017, and follow up actions proceeded.

Describe Area Affected and Cleanup Action Taken.\* A release has been confirmed at this site.

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 "Initial 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: Logan Hixon	Approved by Environmental Specialist: 	
Title: EHS Coordinator	Approval Date: 2/3/2018	Expiration Date:
E-mail Address: Logan_Hixon@xtoenergy.com	Conditions of Approval: _____	Attached <input type="checkbox"/>
Date: 2/5/2018 Phone: 505-333-3100		

\* Attach Additional Sheets If Necessary

NCS 1803042916

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

**Lease Name: Martin Gas Com B 1F**

**API No.: 30-045-34091**

**Description: Unit H, Section 31, Township 28N, Range 10W, 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 February 5, 2018**
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 February 5, 2018**
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 an integrity failure of the pit tank.**

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	< 0.0143 mg/kg
BTEX	EPA SW-846 8021B or 8260B	50	4.982 mg/kg
TPH	EPA 8015M	100	340.20 mg/kg
Chloride	EPA Method 300	250	568 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.  
**Due to the integrity failure of the pit tank a 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..**
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, and Ms. Vanessa Fields with the Aztec office of the OCD via email on December 22, 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 December 22, 2017.**

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 will be recontoured to match the above specifications when the well is 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 will be reclaimed pursuant to per landowner 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 landowner 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 landowner Specifications**
- vii. Re-vegetation application rates and seeding techniques, (or approved alternative to re-vegetation requirements if applicable); **per landowner specifications**
- viii. Photo documentation of the site reclamation. **attached**

## XTO Energy - San Juan Division

Sample Delivery Group: L961514  
Samples Received: 01/06/2018  
Project Number: 30-045-34091  
Description: Martin GC B#1F

Report To: Kurt Hoekstra  
382 County Road 3100  
Aztec, NM 87410

Entire Report Reviewed By:



Daphne Richards  
Technical Service Representative

Results relate only to the items tested or calibrated and are reported as rounded values. This test report shall not be reproduced, except in full, without written approval of the laboratory. Where applicable, sampling conducted by ESC is performed per guidance provided in laboratory standard operating procedures: 060302, 060303, and 060304.

# TABLE OF CONTENTS

ONE LAB. NATIONWIDE.



<b>Cp: Cover Page</b>	1	<sup>1</sup> Cp
<b>Tc: Table of Contents</b>	2	
<b>Ss: Sample Summary</b>	3	<sup>2</sup> Tc
<b>Cn: Case Narrative</b>	4	
<b>Sr: Sample Results</b>	5	<sup>3</sup> Ss
<b>MARTIN GC B#1F L961514-01</b>	5	
<b>Qc: Quality Control Summary</b>	6	<sup>4</sup> Cn
<b>Total Solids by Method 2540 G-2011</b>	6	<sup>5</sup> Sr
<b>Wet Chemistry by Method 9056A</b>	7	
<b>Volatile Organic Compounds (GC) by Method 8015/8021</b>	8	<sup>6</sup> Qc
<b>Semi-Volatile Organic Compounds (GC) by Method 8015</b>	10	
<b>Gl: Glossary of Terms</b>	11	<sup>7</sup> Gl
<b>Al: Accreditations &amp; Locations</b>	12	<sup>8</sup> Al
<b>Sc: Sample Chain of Custody</b>	13	<sup>9</sup> Sc

# SAMPLE SUMMARY

ONE LAB. NATIONWIDE.



**MARTIN GC B#1F L961514-01 Solid**

Collected by  
Kurt

Collected date/time  
01/05/18 11:00

Received date/time  
01/06/18 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst
Total Solids by Method 2540 G-2011	WG1060778	1	01/10/18 12:40	01/10/18 12:43	KDW
Wet Chemistry by Method 9056A	WG1060407	1	01/07/18 11:31	01/07/18 23:36	DR
Volatile Organic Compounds (GC) by Method 8015/8021	WG1060512	25	01/06/18 17:00	01/08/18 15:47	BMB
Semi-Volatile Organic Compounds (GC) by Method 8015	WG1060454	1	01/08/18 06:01	01/09/18 10:31	ACM

<sup>1</sup> Cp

<sup>2</sup> Tc

<sup>3</sup> Ss

<sup>4</sup> Cn

<sup>5</sup> Sr

<sup>6</sup> Qc

<sup>7</sup> Gl

<sup>8</sup> Al

<sup>9</sup> Sc



All sample aliquots were received at the correct temperature, in the proper containers, with the appropriate preservatives, and within method specified holding times, unless qualified or notated within the report. Where applicable, all MDL (LOD) and RDL (LOQ) values reported for environmental samples have been corrected for the dilution factor used in the analysis. All radiochemical sample results for solids are reported on a dry weight basis with the exception of tritium, carbon-14 and radon, unless wet weight was requested by the client. All Method and Batch Quality Control are within established criteria except where addressed in this case narrative, a non-conformance form or properly qualified within the sample results. By my digital signature below, I affirm to the best of my knowledge, all problems/anomalies observed by the laboratory as having the potential to affect the quality of the data have been identified by the laboratory, and no information or data have been knowingly withheld that would affect the quality of the data.

Daphne Richards  
Technical Service Representative

1 Cp

2 Tc

3 Ss

4 Cn

5 Sr

6 Qc

7 GI

8 AI

9 Sc



Total Solids by Method 2540 G-2011

Analyte	Result	Qualifier	Dilution	Analysis date / time	Batch
Total Solids	87.6		1	01/10/2018 12:43	<a href="#">WG1060778</a>

1 Cp

2 Tc

Wet Chemistry by Method 9056A

Analyte	Result (dry)	Qualifier	RDL (dry)	Dilution	Analysis date / time	Batch
Chloride	403		11.4	1	01/07/2018 23:36	<a href="#">WG1060407</a>

3 Ss

4 Cn

Volatile Organic Compounds (GC) by Method 8015/8021

Analyte	Result (dry)	Qualifier	RDL (dry)	Dilution	Analysis date / time	Batch
Benzene	ND		0.0143	25	01/08/2018 15:47	<a href="#">WG1060512</a>
Toluene	ND		0.143	25	01/08/2018 15:47	<a href="#">WG1060512</a>
Ethylbenzene	0.942		0.0143	25	01/08/2018 15:47	<a href="#">WG1060512</a>
Total Xylene	4.04		0.0428	25	01/08/2018 15:47	<a href="#">WG1060512</a>
TPH (GC/FID) Low Fraction	209		2.85	25	01/08/2018 15:47	<a href="#">WG1060512</a>
(S) <i>a,a,a</i> -Trifluorotoluene(FID)	91.4		77.0-120		01/08/2018 15:47	<a href="#">WG1060512</a>
(S) <i>a,a,a</i> -Trifluorotoluene(PID)	94.6		75.0-128		01/08/2018 15:47	<a href="#">WG1060512</a>

5 Sr

6 Qc

7 GI

8 AI

9 Sc

Semi-Volatile Organic Compounds (GC) by Method 8015

Analyte	Result (dry)	Qualifier	RDL (dry)	Dilution	Analysis date / time	Batch
C10-C28 Diesel Range	154		4.56	1	01/09/2018 10:31	<a href="#">WG1060454</a>
C28-C40 Oil Range	205		4.56	1	01/09/2018 10:31	<a href="#">WG1060454</a>
(S) <i>o</i> -Terphenyl	48.9		18.0-148		01/09/2018 10:31	<a href="#">WG1060454</a>



Total Solids by Method 2540 G-2011

L961514-01

Method Blank (MB)

(MB) R3278697-1 01/10/18 12:43

Analyte	MB Result	MB Qualifier	MB MDL	MB RDL
	%		%	%
Total Solids	0.001			

1 Cp

2 Tc

3 Ss

L961506-01 Original Sample (OS) • Duplicate (DUP)

(OS) L961506-01 01/10/18 12:43 • (DUP) R3278697-3 01/10/18 12:43

Analyte	Original Result	DUP Result	Dilution	DUP RPD	DUP Qualifier	DUP RPD Limits
	%	%		%		%
Total Solids	77.4	80.0	1	3		5

4 Cn

5 Sr

Laboratory Control Sample (LCS)

(LCS) R3278697-2 01/10/18 12:43

Analyte	Spike Amount	LCS Result	LCS Rec.	Rec. Limits	LCS Qualifier
	%	%	%	%	
Total Solids	50.0	50.0	100	85-115	

6 Qc

7 GI

8 AI

9 Sc

WG1060407

Wet Chemistry by Method 9056A

QUALITY CONTROL SUMMARY

L961514-01

ONE LAB. NATIONWIDE.



Method Blank (MB)

(MB) R3278066-2 01/07/18 16:27

Analyte	MB Result mg/kg	MB Qualifier	MB MDL mg/kg	MB RDL mg/kg
Chloride	2.85	J	0.795	10.0

L960973-01 Original Sample (OS) • Duplicate (DUP)

(OS) L960973-01 01/07/18 18:30 • (DUP) R3278066-5 01/07/18 18:50

Analyte	Original Result (dry) mg/kg	DUP Result (dry) mg/kg	Dilution	DUP RPD %	DUP Qualifier	DUP RPD Limits %
Chloride	1660	1410	1	16.4	J3	15

L961467-03 Original Sample (OS) • Duplicate (DUP)

(OS) L961467-03 01/07/18 22:55 • (DUP) R3278066-8 01/07/18 23:16

Analyte	Original Result mg/kg	DUP Result mg/kg	Dilution	DUP RPD %	DUP Qualifier	DUP RPD Limits %
Chloride	106	105	1	0.619		15

Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) R3278066-3 01/07/18 16:47 • (LCSD) R3278066-4 01/07/18 17:08

Analyte	Spike Amount mg/kg	LCS Result mg/kg	LCSD Result mg/kg	LCS Rec. %	LCSD Rec. %	Rec. Limits %	LCS Qualifier	LCSD Qualifier	RPD %	RPD Limits %
Chloride	200	201	198	101	99	80-120			1.65	15

L961400-01 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L961400-01 01/07/18 19:51 • (MS) R3278066-6 01/07/18 20:12 • (MSD) R3278066-7 01/07/18 20:32

Analyte	Spike Amount mg/kg	Original Result mg/kg	MS Result mg/kg	MSD Result mg/kg	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	RPD %	RPD Limits %
Chloride	500	56.4	570	557	103	100	1	80-120			2.43	15

- 1 Cp
- 2 Tc
- 3 Ss
- 4 Cn
- 5 Sr
- 6 Qc
- 7 Gl
- 8 Al
- 9 Sc

Method Blank (MB)

(MB) R3278105-5 01/08/18 11:32

Analyte	MB Result mg/kg	MB Qualifier	MB MDL mg/kg	MB RDL mg/kg
Benzene	U		0.000120	0.000500
Toluene	0.000207	J	0.000150	0.00500
Ethylbenzene	0.000113	J	0.000110	0.000500
Total Xylene	U		0.000460	0.00150
TPH (GC/FID) Low Fraction	U		0.0217	0.100
(S) a,a,a-Trifluorotoluene(FID)	92.4			77.0-120
(S) a,a,a-Trifluorotoluene(PID)	96.3			75.0-128

Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) R3278105-1 01/08/18 09:46 • (LCSD) R3278105-2 01/08/18 10:07

Analyte	Spike Amount mg/kg	LCS Result mg/kg	LCSD Result mg/kg	LCS Rec. %	LCSD Rec. %	Rec. Limits %	LCS Qualifier	LCSD Qualifier	RPD %	RPD Limits %
Benzene	0.0500	0.0448	0.0450	89.7	90.1	71.0-121			0.456	20
Toluene	0.0500	0.0473	0.0471	94.7	94.2	72.0-120			0.484	20
Ethylbenzene	0.0500	0.0486	0.0485	97.2	96.9	76.0-121			0.247	20
Total Xylene	0.150	0.146	0.147	97.6	97.7	75.0-124			0.0683	20
(S) a,a,a-Trifluorotoluene(FID)				89.8	89.6	77.0-120				
(S) a,a,a-Trifluorotoluene(PID)				93.0	92.4	75.0-128				

Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) R3278105-3 01/08/18 10:29 • (LCSD) R3278105-4 01/08/18 10:50

Analyte	Spike Amount mg/kg	LCS Result mg/kg	LCSD Result mg/kg	LCS Rec. %	LCSD Rec. %	Rec. Limits %	LCS Qualifier	LCSD Qualifier	RPD %	RPD Limits %
TPH (GC/FID) Low Fraction	5.50	4.88	4.76	88.7	86.5	70.0-136			2.47	20
(S) a,a,a-Trifluorotoluene(FID)				87.7	85.9	77.0-120				
(S) a,a,a-Trifluorotoluene(PID)				104	103	75.0-128				

- 1 Cp
- 2 Tc
- 3 Ss
- 4 Cn
- 5 Sr
- 6 Qc
- 7 Gl
- 8 Al
- 9 Sc



Volatile Organic Compounds (GC) by Method 8015/8021

L961514-01

L961532-07 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L961532-07 01/08/18 18:16 • (MS) R3278105-6 01/08/18 19:20 • (MSD) R3278105-7 01/08/18 19:41

Analyte	Spike Amount mg/kg	Original Result mg/kg	MS Result mg/kg	MSD Result mg/kg	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	RPD %	RPD Limits %
Benzene	0.0500	ND	0.0218	0.0256	43.5	51.2	1	10.0-146			16.2	29
Toluene	0.0500	ND	0.0160	0.0222	31.6	44.1	1	10.0-143		J3	32.7	30
Ethylbenzene	0.0500	ND	0.00986	0.0168	19.5	33.5	1	10.0-147		J3	52.3	31
Total Xylene	0.150	ND	0.0288	0.0500	19.2	33.3	1	10.0-149	J6	J3 J6	53.8	30
(S) a,a,a-Trifluorotoluene(FID)					89.0	88.9		77.0-120				
(S) a,a,a-Trifluorotoluene(PID)					92.2	91.7		75.0-128				

1 Cp

2 Tc

3 Ss

4 Cn

5 Sr

6 Qc

L961532-07 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L961532-07 01/08/18 18:16 • (MS) R3278105-8 01/08/18 20:02 • (MSD) R3278105-9 01/08/18 20:24

Analyte	Spike Amount mg/kg	Original Result mg/kg	MS Result mg/kg	MSD Result mg/kg	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	RPD %	RPD Limits %
TPH (GC/FID) Low Fraction	5.50	ND	3.86	1.10	70.1	20.0	1	10.0-147		J3	111	30
(S) a,a,a-Trifluorotoluene(FID)					86.2	88.9		77.0-120				
(S) a,a,a-Trifluorotoluene(PID)					96.4	92.8		75.0-128				

7 Gl

8 Al

9 Sc



Semi-Volatile Organic Compounds (GC) by Method 8015

L961514-01

Method Blank (MB)

(MB) R3278324-1 01/09/18 09:01

Analyte	MB Result	MB Qualifier	MB MDL	MB RDL
	mg/kg		mg/kg	mg/kg
C10-C28 Diesel Range	U		1.61	4.00
C28-C40 Oil Range	U		0.274	4.00
<i>(S) o-Terphenyl</i>	66.0			18.0-148

1 Cp

2 Tc

3 Ss

4 Cn

Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) R3278324-2 01/09/18 09:15 • (LCSD) R3278324-3 01/09/18 09:30

Analyte	Spike Amount	LCS Result	LCSD Result	LCS Rec.	LCSD Rec.	Rec. Limits	LCS Qualifier	LCSD Qualifier	RPD	RPD Limits
	mg/kg	mg/kg	mg/kg	%	%	%			%	%
C10-C28 Diesel Range	60.0	33.2	35.5	55.3	59.1	50.0-150			6.66	20
<i>(S) o-Terphenyl</i>				61.9	62.9	18.0-148				

5 Sr

6 Qc

7 Gl

8 Al

9 Sc



Guide to Reading and Understanding Your Laboratory Report

The information below is designed to better explain the various terms used in your report of analytical results from the Laboratory. This is not intended as a comprehensive explanation, and if you have additional questions please contact your project representative.

Abbreviations and Definitions

(dry)	Results are reported based on the dry weight of the sample. [this will only be present on a dry report basis for soils].
MDL	Method Detection Limit.
ND	Not detected at the Reporting Limit (or MDL where applicable).
RDL	Reported Detection Limit.
RDL (dry)	Reported Detection Limit.
Rec.	Recovery.
RPD	Relative Percent Difference.
SDG	Sample Delivery Group.
(S)	Surrogate (Surrogate Standard) - Analytes added to every blank, sample, Laboratory Control Sample/Duplicate and Matrix Spike/Duplicate; used to evaluate analytical efficiency by measuring recovery. Surrogates are not expected to be detected in all environmental media.
U	Not detected at the Reporting Limit (or MDL where applicable).
Analyte	The name of the particular compound or analysis performed. Some Analyses and Methods will have multiple analytes reported.
Dilution	If the sample matrix contains an interfering material, or if concentrations of analytes in the sample are higher than the highest limit of concentration that the laboratory can accurately report, the sample may be diluted for analysis. If a value different than 1 is used in this field, the result reported has already been corrected for this factor.
Limits	These are the target % recovery ranges or % difference value that the laboratory has historically determined as normal for the method and analyte being reported. Successful QC Sample analysis will target all analytes recovered or duplicated within these ranges.
Original Sample	The non-spiked sample in the prep batch used to determine the Relative Percent Difference (RPD) from a quality control sample. The Original Sample may not be included within the reported SDG.
Qualifier	This column provides a letter and/or number designation that corresponds to additional information concerning the result reported. If a Qualifier is present, a definition per Qualifier is provided within the Glossary and Definitions page and potentially a discussion of possible implications of the Qualifier in the Case Narrative if applicable.
Result	The actual analytical final result (corrected for any sample specific characteristics) reported for your sample. If there was no measurable result returned for a specific analyte, the result in this column may state "ND" (Not Detected) or "BDL" (Below Detectable Levels). The information in the results column should always be accompanied by either an MDL (Method Detection Limit) or RDL (Reporting Detection Limit) that defines the lowest value that the laboratory could detect or report for this analyte.
Case Narrative (Cn)	A brief discussion about the included sample results, including a discussion of any non-conformances to protocol observed either at sample receipt by the laboratory from the field or during the analytical process. If present, there will be a section in the Case Narrative to discuss the meaning of any data qualifiers used in the report.
Quality Control Summary (Qc)	This section of the report includes the results of the laboratory quality control analyses required by procedure or analytical methods to assist in evaluating the validity of the results reported for your samples. These analyses are not being performed on your samples typically, but on laboratory generated material.
Sample Chain of Custody (Sc)	This is the document created in the field when your samples were initially collected. This is used to verify the time and date of collection, the person collecting the samples, and the analyses that the laboratory is requested to perform. This chain of custody also documents all persons (excluding commercial shippers) that have had control or possession of the samples from the time of collection until delivery to the laboratory for analysis.
Sample Results (Sr)	This section of your report will provide the results of all testing performed on your samples. These results are provided by sample ID and are separated by the analyses performed on each sample. The header line of each analysis section for each sample will provide the name and method number for the analysis reported.
Sample Summary (Ss)	This section of the Analytical Report defines the specific analyses performed for each sample ID, including the dates and times of preparation and/or analysis.

<sup>1</sup> Cp

<sup>2</sup> Tc

<sup>3</sup> Ss

<sup>4</sup> Cn

<sup>5</sup> Sr

<sup>6</sup> Qc

<sup>7</sup> G

<sup>8</sup> Al

<sup>9</sup> Sc

Qualifier	Description
J	The identification of the analyte is acceptable; the reported value is an estimate.
J3	The associated batch QC was outside the established quality control range for precision.
J6	The sample matrix interfered with the ability to make any accurate determination; spike value is low.

# ACCREDITATIONS & LOCATIONS

ONE LAB. NATIONWIDE.



ESC Lab Sciences is the only environmental laboratory accredited/certified to support your work nationwide from one location. One phone call, one point of contact, one laboratory. No other lab is as accessible or prepared to handle your needs throughout the country. Our capacity and capability from our single location laboratory is comparable to the collective totals of the network laboratories in our industry. The most significant benefit to our "one location" design is the design of our laboratory campus. The model is conducive to accelerated productivity, decreasing turn-around time, and preventing cross contamination, thus protecting sample integrity. Our focus on premium quality and prompt service allows us to be **YOUR LAB OF CHOICE**.  
 \* Not all certifications held by the laboratory are applicable to the results reported in the attached report.

- 1 Cp
- 2 Tc
- 3 Ss
- 4 Cn
- 5 Sr
- 6 Qc
- 7 Gl
- 8 Al
- 9 Sc

## State Accreditations

Alabama	40660	Nevada	TN-03-2002-34
Alaska	UST-080	New Hampshire	2975
Arizona	AZ0612	New Jersey-NELAP	TN002
Arkansas	88-0469	New Mexico	TN00003
California	01157CA	New York	11742
Colorado	TN00003	North Carolina	Env375
Connecticut	PH-0197	North Carolina <sup>1</sup>	DW21704
Florida	E87487	North Carolina <sup>2</sup>	41
Georgia	NELAP	North Dakota	R-140
Georgia <sup>1</sup>	923	Ohio-VAP	CL0069
Idaho	TN00003	Oklahoma	9915
Illinois	200008	Oregon	TN200002
Indiana	C-TN-01	Pennsylvania	68-02979
Iowa	364	Rhode Island	221
Kansas	E-10277	South Carolina	84004
Kentucky <sup>1</sup>	90010	South Dakota	n/a
Kentucky <sup>2</sup>	16	Tennessee <sup>14</sup>	2006
Louisiana	AI30792	Texas	T 104704245-07-TX
Maine	TN0002	Texas <sup>5</sup>	LAB0152
Maryland	324	Utah	6157585858
Massachusetts	M-TN003	Vermont	VT2006
Michigan	9958	Virginia	109
Minnesota	047-999-395	Washington	C1915
Mississippi	TN00003	West Virginia	233
Missouri	340	Wisconsin	9980939910
Montana	CERT0086	Wyoming	A2LA
Nebraska	NE-OS-15-05		

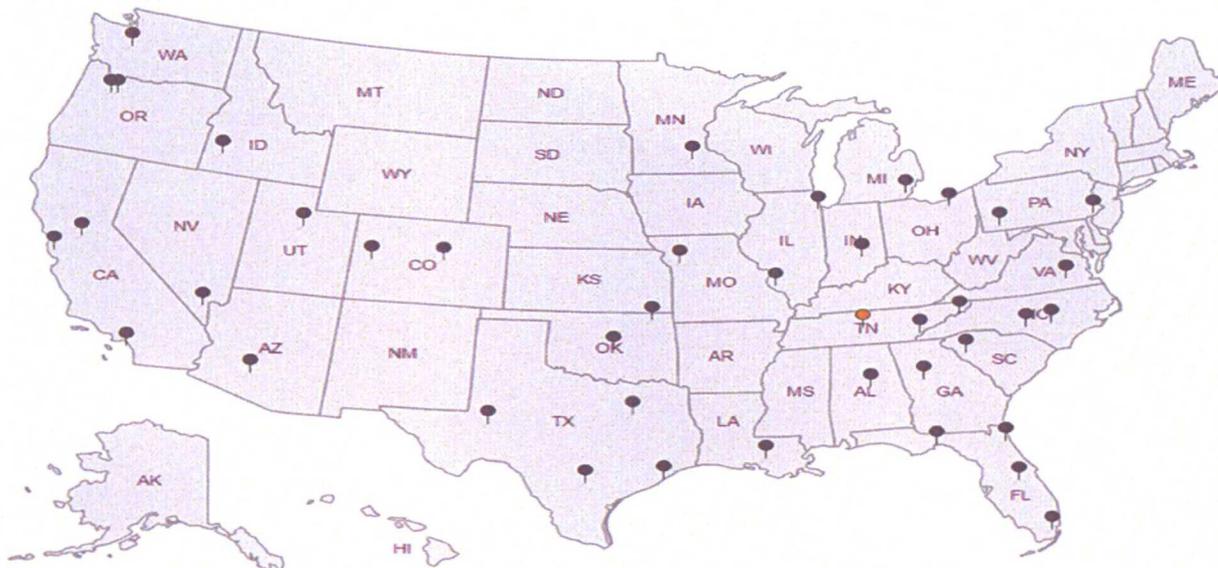
## Third Party & Federal Accreditations

A2LA – ISO 17025	1461.01	AIHA-LAP,LLC	100789
A2LA – ISO 17025 <sup>5</sup>	1461.02	DOD	1461.01
Canada	1461.01	USDA	S-67674
EPA-Crypto	TN00003		

<sup>1</sup> Drinking Water <sup>2</sup> Underground Storage Tanks <sup>3</sup> Aquatic Toxicity <sup>4</sup> Chemical/Microbiological <sup>5</sup> Mold <sup>n/a</sup> Accreditation not applicable

## Our Locations

ESC Lab Sciences has sixty-four client support centers that provide sample pickup and/or the delivery of sampling supplies. If you would like assistance from one of our support offices, please contact our main office. **ESC Lab Sciences performs all testing at our central laboratory.**



ACCOUNT:  
XTO Energy - San Juan Division

PROJECT:  
30-045-34091

SDG:  
L961514

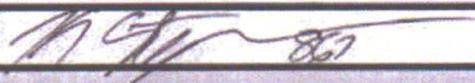
DATE/TIME:  
01/12/18 10:04

PAGE:  
12 of 14

	Quote Number		Page ___ of ___		Analysis/Container				Lab Information			
	XTO Contact <i>KURT</i>		XTO Contact Phone # <i>505-486-9543</i>									
	Well Site/Location <i>MARTIN GC B#1F</i>		API Number <i>30-045-34091</i>		Saturday Delivery (Y/N) <input checked="" type="checkbox"/>		TPH 8015 DRO/ORO BTEX 8021 CHLORIDE				<b>Office Abbreviations</b> Farmington = FAR Durango = DUR Bahken = BAK Raton = RAT Piceance = PC Roosevelt = RSV La Barge = LB Orangeville = OV	
Collected By <i>KURT</i>		Samples on Ice <input checked="" type="checkbox"/>		Turnaround								
Company <i>XTO</i>		Test Reason <i>BGT CLOSURE</i>		<input checked="" type="checkbox"/> Standard <input type="checkbox"/> Next Day <input type="checkbox"/> Two Day <input type="checkbox"/> Three Day <input type="checkbox"/> Same Day								
Signature <i>Kurt Logan</i>		Gray Areas for Lab Use Only!		Date Needed								
Sample ID	Sample Name	Media	Date	Time	Preservative	No. of Conts.					Sample Number	
<i>MARTIN GC B#1F</i>	<i>BGT CELLAR</i>	<i>S</i>	<i>1-5</i>	<i>11:00</i>	<i>ON ICE</i>	<i>(1) 4oz</i>	<i>X</i>	<i>X</i>	<i>X</i>			<i>961514-01</i>
Media: Filter = F Soil = S Wastewater = WW Groundwater = GW Drinking Water = DW Sludge = SG Surface Water = SW Air = A Drill Mud = DM Other = OT												
Relinquished By: (Signature) <i>Kurt Logan</i>			Date: <i>1-5-18</i>		Time: <i>12:15</i>		Received By: (Signature)			Number of Bottles		Sample Condition
Relinquished By: (Signature)			Date:		Time:					Temperature: <i>4.56</i>		Other Information
Relinquished By: (Signature)			Date:		Time:		Received for Lab by: (Signature) <i>Kurt Logan 867</i>			Date: <i>1/6/18</i> Time: <i>545</i>		
Comments <i>7305 8947 4908</i>												

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

## ESC LAB SCIENCES Cooler Receipt Form

Client: <u>X-Tollman</u>	SDG#	<u>96/514</u>		
Cooler Received/Opened On: <u>01/6/18</u>	Temperature:	<u>4.5</u>	<u>°C</u>	
Received by ; Kelsey Stephenson				
Signature: 				
Receipt Check List		NP	Yes	No
COC Seal Present / Intact?		/		
COC Signed / Accurate?			/	
Bottles arrive intact?			/	
Correct bottles used?			/	
Sufficient volume sent?			/	
If Applicable				
VOA Zero headspace?				
Preservation Correct / Checked?				



Route Name  
DEN NEP RUC 58

StopName  
MARTIN GAS COM B

Foreman  
Sandwich, David

Well Name  
MARTIN OC B DTF

API Well Number  
300525201

Section  
31

Range  
12W

Township  
28N

Inspector Name	Record Date	Inspection Time	Visible Liner Yes/No	Visible Liner Yes/No	Visible Tank Yes/No	Collection Of Drifts/No	Visible Layer Yes/No	Freeboard PI Feet	PI Type	Notes
Tap	10/9/2008	11:38	No	No	No	No	No	5	Below Ground	
Tap	11/25/2008	09:20	No	No	No	No	No	3	Below Ground	
Tap	12/7/2008	15:08	No	No	No	No	No	215	Below Ground	
Tap	1/6/2009	11:00	No	No	No	No	No	4	Below Ground	
Tap	2/6/2009	12:20	No	No	No	No	No	4	Below Ground	
Tap	3/6/2009	14:15	No	No	No	No	No	2	Below Ground	
Tap	4/6/2009	12:10	No	No	No	No	No	4	Below Ground	
Tap	5/6/2009	11:50	No	No	No	No	No	4	Below Ground	
Tap	6/6/2009	11:50	No	No	No	No	No	2	Below Ground	
Tap	7/16/2009	15:10	No	No	No	No	No	2	Below Ground	
Tap	8/23/2009	10:55	No	No	No	No	No	4	Below Ground	
Tap	9/22/2009	09:40	No	No	No	No	No	3	Below Ground	
Tap	10/9/2009	14:00	No	No	No	No	No	3	Below Ground	
Tap	11/14/2009	14:30	No	No	No	No	No	3	Below Ground	
Tap	12/1/2009	14:55	No	No	No	No	No	2	Below Ground	
Tap	1/16/2010	15:00	No	No	No	No	No	2	Below Ground	
Tap	2/20/2010	15:00	No	No	No	No	No	2	Below Ground	
Tap	3/17/2010	14:52	No	No	No	No	No	5	Below Ground	
Tap	4/14/2010	14:52	No	No	No	No	No	5	Below Ground	
Tap	5/12/2010	10:20	No	No	No	No	No	4	Below Ground	
Tap	6/10/2010	11:50	No	No	No	No	No	4	Below Ground	
Tap	7/10/2010	14:00	No	No	No	No	No	3	Below Ground	
Tap	8/10/2010	14:00	No	No	No	No	No	2	Below Ground	
Tap	9/7/2010	15:15	No	No	No	No	No	3	Below Ground	
Tap	10/4/2010	10:10	No	No	No	No	No	4	Below Ground	
Tap	11/15/2010	15:20	No	No	No	No	No	4	Below Ground	
Tap	12/15/2010	15:40	No	No	No	No	No	4	Below Ground	
Tap	1/7/2011	12:05	No	No	No	No	No	3	Below Ground	
Tap	2/11/2011	14:15	No	No	No	No	No	3	Below Ground	
Tap	3/4/2011	14:25	No	No	No	No	No	3	Below Ground	
Tap	4/20/2011	12:40	No	No	No	No	No	2	Below Ground	
Tap	5/20/2011	03:25	No	No	No	No	No	3	Below Ground	
Tap	6/30/2011	03:25	No	No	No	No	No	3	Below Ground	
Tap	7/26/2011	03:30	No	No	No	No	No	3	Below Ground	
Tap	8/22/2011	10:30	No	No	No	No	No	3	Below Ground	
Tap	9/7/2011	08:30	No	No	No	No	No	3	Below Ground	
Tap	10/10/2011	08:30	No	No	No	No	No	3	Below Ground	
Tap	11/10/2011	08:24	No	No	No	No	No	2	Below Ground	
Tap	12/5/2011	08:24	No	No	No	No	No	2	Below Ground	
Tap	1/5/2012	08:24	No	No	No	No	No	2	Below Ground	
Tap	2/6/2012	08:27	No	No	No	No	No	3	Below Ground	
Tap	3/16/2012	08:27	No	No	No	No	No	3	Below Ground	
Tap	4/16/2012	03:00	No	No	No	No	No	3	Below Ground	
Tap	5/15/2012	03:12	No	No	No	No	No	3	Below Ground	
Tap	6/7/2012	03:10	No	No	No	No	No	3	Below Ground	
Tap	7/23/2012	03:12	No	No	No	No	No	2	Below Ground	
Tap	8/6/2012	03:11	No	No	No	No	No	3	Below Ground	
Tap	9/3/2012	03:11	No	No	No	No	No	3	Below Ground	
Tap	10/1/2012	03:08	No	No	No	No	No	2	Below Ground	
Tap	11/6/2012	03:08	No	No	No	No	No	3	Below Ground	
Tap	12/20/2012	03:08	No	No	No	No	No	3	Below Ground	
Tap	1/22/2013	03:08	No	No	No	No	No	3	Below Ground	
Tap	2/22/2013	03:08	No	No	No	No	No	3	Below Ground	
Tap	3/14/2013	03:10	No	No	No	No	No	3	Below Ground	
Tap	4/11/2013	03:11	No	No	No	No	No	3	Below Ground	
Tap	5/16/2013	03:10	No	No	No	No	No	3	Below Ground	
Tap	6/26/2013	03:10	No	No	No	No	No	3	Below Ground	
Tap	7/24/2013	03:10	No	No	No	No	No	3	Below Ground	
Tap	8/20/2013	03:10	No	No	No	No	No	3	Below Ground	
Tap	9/10/2013	15:00	No	No	No	No	No	3	Below Ground	
Tap	10/2/2013	12:27	No	No	No	No	No	4	Below Ground	
Tap	11/1/2013	13:15	No	No	No	No	No	4	Below Ground	
Tap	12/11/2013	13:15	No	No	No	No	No	3	Below Ground	
Tap	1/9/2014	14:45	No	No	No	No	No	3	Below Ground	
Tap	2/19/2014	11:58	No	No	No	No	No	2	Below Ground	
Tap	3/19/2014	14:25	No	No	No	No	No	3	Below Ground	
Tap	4/11/2014	11:55	No	No	No	No	No	3	Below Ground	
Tap	5/16/2014	12:30	No	No	No	No	No	3	Below Ground	
Tap	6/26/2014	11:15	No	No	No	No	No	3	Below Ground	
Tap	7/24/2014	11:15	No	No	No	No	No	3	Below Ground	
Tap	8/20/2014	12:40	No	No	No	No	No	4	Below Ground	
Tap	9/10/2014	15:17	No	No	No	No	No	4	Below Ground	
Tap	10/2/2014	13:15	No	No	No	No	No	4	Below Ground	
Tap	11/11/2014	14:45	No	No	No	No	No	3	Below Ground	
Tap	12/11/2014	14:18	No	No	No	No	No	3	Below Ground	
Tap	1/9/2015	14:18	No	No	No	No	No	3	Below Ground	
Tap	2/11/2015	13:45	No	No	No	No	No	2	Below Ground	
Tap	3/26/2015	13:00	No	No	No	No	No	3	Below Ground	
Tap	4/20/2015	10:53	No	No	No	No	No	5	Below Ground	
Tap	5/15/2015	15:45	No	No	No	No	No	2	Below Ground	
Tap	6/25/2015	09:55	No	No	No	No	No	5	Below Ground	
Tap	7/23/2015	11:25	No	No	No	No	No	2	Below Ground	
Tap	8/20/2015	11:25	No	No	No	No	No	2	Below Ground	
Tap	9/22/2015	12:18	No	No	No	No	No	3	Below Ground	
Tap	10/20/2015	14:32	No	No	No	No	No	5	Below Ground	
Tap	11/19/2015	14:32	No	No	No	No	No	2	Below Ground	
Tap	12/30/2015	14:21	No	No	No	No	No	3	Below Ground	
Tap	1/17/2016	14:38	No	No	No	No	No	3	Below Ground	
Tap	2/17/2016	10:14	No	No	No	No	No	4	Below Ground	
Tap	3/10/2016	13:00	No	No	No	No	No	3	Below Ground	
Tap	4/7/2016	10:46	No	No	No	No	No	4	Below Ground	
Tap	5/10/2016	14:19	No	No	No	No	No	2	Below Ground	
Tap	6/10/2016	14:10	No	No	No	No	No	2	Below Ground	
Tap	7/13/2016	14:10	No	No	No	No	No	4	Below Ground	
Tap	8/10/2016	09:28	No	No	No	No	No	4	Below Ground	
Tap	9/20/2016	12:22	No	No	No	No	No	2	Below Ground	
Tap	10/20/2016	14:25	No	No	No	No	No	3	Below Ground	
Tap	11/9/2016	08:55	No	No	No	No	No	2	Below Ground	
Tap	12/1/2016	11:30	No	No	No	No	No	3	Below Ground	
Tap	1/18/2017	13:30	No	No	No	No	No	5	Below Ground	
Tap	2/13/2017	13:30	No	No	No	No	No	2	Below Ground	

## Hixon, Logan

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**From:** Hixon, Logan  
**Sent:** Tuesday, January 02, 2018 7:02 AM  
**To:** Smith, Cory, EMNRD; Fields, Vanessa, EMNRD; Thomas, Leigh (l1thomas@blm.gov); BRANDON POWELL (brandon.powell@state.nm.us)  
**Cc:** Hoekstra, Kurt; Naegele, Otto (Otto\_Naegele@xtoenergy.com); Woolley, Jeff; Harrison, Lyndon; Sanders, David (David\_Sanders@xtoenergy.com); Weaver, John (John\_Weaver@xtoenergy.com); Dawes, Thomas (Thomas\_Dawes@xtoenergy.com); Trujillo, Marcos (Marcos\_Trujillo@xtoenergy.com); Logan, Michael (Michael\_Logan@xtoenergy.com); Marriott, Mike (Mike\_Marriott@xtoenergy.com); Nee, Martin (Martin\_Nee@xtoenergy.com)  
**Subject:** 2018-1-2, 72 Hour BGT Closure Notification, 2018/5/1-2018/5/12, Martin Gas Com B 1F (API: 30-045-34091)

All,

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

-Martin Gas Com B 1F (API 30-045-34091) located in Section 31 (H), Township 28N, Range 10W, and San Juan County, New Mexico.

On December 21, 2017 it was discovered there was a leak in the below grade tank allowing produced water to be contained within the cellar. Approximately (52) fifty-two barrels of produced water was released in to the cellar. The tank was emptied and (20) twenty barrels of fluid were recovered from the cellar. This BGT is being closed and brought above grade, due to not meeting siting criteria for a BGT.

The closure plan was approved on December 21, 2017.

Work is tentatively scheduled for Friday January 5, 2018 at approximately 0800 MST.

If there is any unforeseen delays in closure activities with this BGT and it will not be initiated within a week's time (January 12, 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!***

Logan Hixon | 321 22<sup>nd</sup> Avenue East | Williston, ND 58801 | Cell: 505-386 8018 | Home: 505-320-6133 |

[Logan\\_Hixon@xtoenergy.com](mailto:Logan_Hixon@xtoenergy.com)

**XTO ENERGY INC.**, an ExxonMobil subsidiary

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## Hixon, Logan

---

**From:** Smith, Cory, EMNRD <Cory.Smith@state.nm.us>  
**Sent:** Thursday, February 01, 2018 7:42 AM  
**To:** Hixon, Logan; Powell, Brandon, EMNRD; Fields, Vanessa, EMNRD; Thomas, Leigh (l1thomas@blm.gov)  
**Cc:** Hoekstra, Kurt; Naegele, Otto; Trujillo, Marcos; Weaver, John; Harrison, Lyndon; Sanders, David; Marriott, Mike; Nee, Martin; Barnhill, Matthew  
**Subject:** RE: Martin Gas Com B # 1F  
**Categories:** External Sender

Logan,

OCD approves your request for alternative closure standards.. Remember when submitting your C-144 Closure packet include the initial failing results. In your C-141 final include all of your passing laboratory data and this approval.

Thank you,

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

**From:** Hixon, Logan [mailto:Logan\_Hixon@xtoenergy.com]  
**Sent:** Wednesday, January 31, 2018 4:39 PM  
**To:** Smith, Cory, EMNRD <Cory.Smith@state.nm.us>; Powell, Brandon, EMNRD <Brandon.Powell@state.nm.us>; Fields, Vanessa, EMNRD <Vanessa.Fields@state.nm.us>; Thomas, Leigh (l1thomas@blm.gov) <l1thomas@blm.gov>  
**Cc:** Hoekstra, Kurt <Kurt\_Hoekstra@xtoenergy.com>; Naegele, Otto <Otto\_Naegele@xtoenergy.com>; Trujillo, Marcos <Marcos\_Trujillo@xtoenergy.com>; Weaver, John <John\_Weaver@xtoenergy.com>; Harrison, Lyndon <Lyndon\_Harrison@xtoenergy.com>; Sanders, David <David\_Sanders@xtoenergy.com>; Marriott, Mike <Mike\_Marriott@xtoenergy.com>; Nee, Martin <Martin\_Nee@xtoenergy.com>; Barnhill, Matthew <Matthew\_Barnhill@xtoenergy.com>  
**Subject:** RE: Martin Gas Com B # 1F

Good Evening All,

Attached are the preliminary sample results from the excavation at the Martin Gas Com B 1F. The excavation reached approximately 17 feet East to West, 14 feet North to South, and approximately 9' deep.

The samples returned results below the NMOCD Guidelines for the remediation of leaks, spills and releases on the North Wall, East Wall, West Wall, and the Bottom.

The sample collected from the south wall returned results below the guidelines for Benzene and BTEX at non-detect, but returned results of 290 ppm TPH (All oil range organics).

XTO would like to request that with remaining constituent on the south wall being comprised of oil range organics, that is believed to be non-mobile and with a confining sandstone layer in the bottom that no further action be required for this site.

No further excavation or closure will occur, until approval or denial of the request stated above.

If approved a BGT closure report will be submitted with an initial C-141 and final C-141 outlining the remediation that has occurred at this site.

Thank you for your consideration and if you have any questions do not hesitate to contact us at any time.

**Thank You!**

Logan Hixon | 321 22<sup>nd</sup> Avenue East | Williston, ND 58801 | Cell: 505-386 8018 | Home: 505-320-6133 |

[Logan.Hixon@xtoenergy.com](mailto:Logan.Hixon@xtoenergy.com)

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**From:** Smith, Cory, EMNRD [<mailto:Cory.Smith@state.nm.us>]

**Sent:** Tuesday, January 23, 2018 1:35 PM

**To:** Hoekstra, Kurt <[Kurt.Hoekstra@xtoenergy.com](mailto:Kurt.Hoekstra@xtoenergy.com)>; Hixon, Logan <[Logan.Hixon@xtoenergy.com](mailto:Logan.Hixon@xtoenergy.com)>

**Cc:** Powell, Brandon, EMNRD <[Brandon.Powell@state.nm.us](mailto:Brandon.Powell@state.nm.us)>; Fields, Vanessa, EMNRD <[Vanessa.Fields@state.nm.us](mailto:Vanessa.Fields@state.nm.us)>;

Whitney Thomas ([l1thomas@blm.gov](mailto:l1thomas@blm.gov)) <[l1thomas@blm.gov](mailto:l1thomas@blm.gov)>

**Subject:** RE: Martin Gas Com B # 1F

Kurt,

You read my mind, thanks for the update ill put XTO on the schedule for 1/30/18 @ 10:30. Please let me know if anything changes between now and then.

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

**From:** Hoekstra, Kurt [<mailto:Kurt.Hoekstra@xtoenergy.com>]

**Sent:** Tuesday, January 23, 2018 11:23 AM

**To:** Smith, Cory, EMNRD <[Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)>; Hixon, Logan <[Logan.Hixon@xtoenergy.com](mailto:Logan.Hixon@xtoenergy.com)>

**Cc:** Powell, Brandon, EMNRD <[Brandon.Powell@state.nm.us](mailto:Brandon.Powell@state.nm.us)>; Fields, Vanessa, EMNRD <[Vanessa.Fields@state.nm.us](mailto:Vanessa.Fields@state.nm.us)>;

Whitney Thomas ([l1thomas@blm.gov](mailto:l1thomas@blm.gov)) <[l1thomas@blm.gov](mailto:l1thomas@blm.gov)>

**Subject:** RE: Martin Gas Com B # 1F

Yes Cory that is correct we will probably excavate another 2-3 feet and take another sample hopefully for closure. I know you also want 4 wall samples we will start on Tuesday about 8:00 should be ready to sample by about 10:30 or 11:00 I imagine.

---

**From:** Smith, Cory, EMNRD [<mailto:Cory.Smith@state.nm.us>]

**Sent:** Tuesday, January 23, 2018 9:21 AM

**To:** Hoekstra, Kurt

**Cc:** Powell, Brandon, EMNRD; Fields, Vanessa, EMNRD; Whitney Thomas ([l1thomas@blm.gov](mailto:l1thomas@blm.gov))

**Subject:** RE: Martin Gas Com B # 1F

Kurt,

This is for the site that we met up on two Fridays ago correct? If I recall XTO was going to remove about 1-2' of soil and collect a sample due to suspected release already.

This notification is for continuing to excavate Correct?

Cory Smith

Environmental Specialist

Oil Conservation Division

Energy, Minerals, & Natural Resources

1000 Rio Brazos, Aztec, NM 87410

(505)334-6178 ext 115

[cory.smith@state.nm.us](mailto:cory.smith@state.nm.us)

**From:** Trujillo, Marcos [[mailto:Marcos\\_Trujillo@xtoenergy.com](mailto:Marcos_Trujillo@xtoenergy.com)]

**Sent:** Tuesday, January 23, 2018 8:31 AM

**To:** Hoekstra, Kurt <[Kurt\\_Hoekstra@xtoenergy.com](mailto:Kurt_Hoekstra@xtoenergy.com)>; Smith, Cory, EMNRD <[Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)>; Fields, Vanessa, EMNRD <[Vanessa.Fields@state.nm.us](mailto:Vanessa.Fields@state.nm.us)>; Whitney Thomas ([l1thomas@blm.gov](mailto:l1thomas@blm.gov)) <[l1thomas@blm.gov](mailto:l1thomas@blm.gov)>; Powell, Brandon, EMNRD <[Brandon.Powell@state.nm.us](mailto:Brandon.Powell@state.nm.us)>

**Cc:** Woolley, Jeff <[Jeff\\_Woolley@xtoenergy.com](mailto:Jeff_Woolley@xtoenergy.com)>; Harrison, Lyndon <[Lyndon\\_Harrison@xtoenergy.com](mailto:Lyndon_Harrison@xtoenergy.com)>; Sanders, David <[David\\_Sanders@xtoenergy.com](mailto:David_Sanders@xtoenergy.com)>; Weaver, John <[John\\_Weaver@xtoenergy.com](mailto:John_Weaver@xtoenergy.com)>; Logan, Michael <[Michael\\_Logan@xtoenergy.com](mailto:Michael_Logan@xtoenergy.com)>; Marriott, Mike <[Mike\\_Marriott@xtoenergy.com](mailto:Mike_Marriott@xtoenergy.com)>; Nee, Martin <[Martin\\_Nee@xtoenergy.com](mailto:Martin_Nee@xtoenergy.com)>

**Subject:** RE: Martin Gas Com B # 1F

Kurt,

The one call is in has been made & will be good on Thursday 01/25/2018 thanks.

---

**From:** Hoekstra, Kurt

**Sent:** Tuesday, January 23, 2018 7:43 AM

**To:** Smith, Cory, EMNRD; Fields, Vanessa, EMNRD ([Vanessa.Fields@state.nm.us](mailto:Vanessa.Fields@state.nm.us)); Whitney Thomas ([l1thomas@blm.gov](mailto:l1thomas@blm.gov)); Brandon Powell ([brandon.powell@state.nm.us](mailto:brandon.powell@state.nm.us))

**Cc:** Woolley, Jeff; Harrison, Lyndon; Sanders, David; Weaver, John; Dawes, Thomas; Trujillo, Marcos; Logan, Michael; Marriott, Mike; Nee, Martin

**Subject:** RE: Martin Gas Com B # 1F

Sorry the correct date is Tuesday 1-30-2018.

---

**From:** Hoekstra, Kurt  
**Sent:** Tuesday, January 23, 2018 7:38 AM  
**To:** Smith, Cory, EMNRD; Fields, Vanessa, EMNRD ([Vanessa.Fields@state.nm.us](mailto:Vanessa.Fields@state.nm.us)); Whitney Thomas ([l1thomas@blm.gov](mailto:l1thomas@blm.gov)); Brandon Powell ([brandon.powell@state.nm.us](mailto:brandon.powell@state.nm.us))  
**Cc:** Woolley, Jeff; Harrison, Lyndon; Sanders, David; Weaver, John; Dawes, Thomas; Trujillo, Marcos; Logan, Michael; Marriott, Mike; Martin Nee ([Martin\\_Nee@xtoenergy.com](mailto:Martin_Nee@xtoenergy.com))  
**Subject:** Martin Gas Com B # 1F

Mr. Smith and Ms. Fields

Please accept this email as the required 72 hour notification for BGT closure activities at the Martin Gas Com B # 1F well site API # (30-045-34091) located in Section 29H, Township 28N, Range 10W, San Juan County, New Mexico. The initial sample results for this BGT closure were above standards of TPH 100 ppm for this site. The sample results were GRO 209 ppm, DRO 154 ppm, and ORO 205 ppm . Work is tentatively scheduled for Tuesday 1-29-2018 at 8:00 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

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

**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