

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-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	NAB1901038306
District RP	2RP-5169
Facility ID	fAB1901038066
Application ID	pAB1901037748

Release Notification

Responsible Party

Responsible Party XTO Energy, Inc.	OGRID 5380
Contact Name Kyle Littrell	Contact Telephone 432-221-7331
Contact email kyle_littrell@xtoenergy.com	Incident # (assigned by OCD) NAB1901038306
Contact mailing address 522 W. Mermod, Suite 704, Carlsbad, NM	

Location of Release Source

Latitude 32.287 Longitude -103.959
(NAD 83 in decimal degrees to 5 decimal places)

Site Name PCA 53	Site Type
Date Release Discovered 11/27/18	API# (if applicable)

Unit Letter	Section	Township	Range	County
K	23	23S	29E	Eddy

Surface Owner: ☐ State ☒ Federal ☐ Tribal ☐ Private (Name: _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input checked="" type="checkbox"/> Crude Oil	Volume Released (bbls) 2,022	Volume Recovered (bbls) 0
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 6,066	Volume Recovered (bbls) 0
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

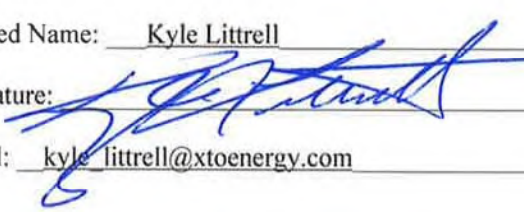
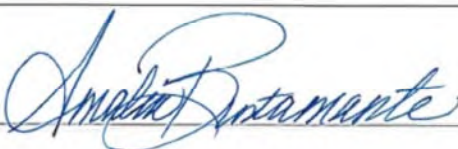
On November 27th, the BLM notified XTO that fluids had been discovered on surface through an existing corehole associated with a nearby potash mine. In October, XTO experienced a pressure loss while drilling the Remuda South 25 State 101H and an unknown volume of flowback fluids were released into the subsurface. BLM has associated the loss of flowback fluids into the subsurface to the November 27th event. Inspection of the site was performed by an environmental contractor and review of the data is in progress.

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Was this a major release as defined by 19.15.29.7(A) NMAC? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? The release exceeded 25 bbls of produced water and oil.
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? Release was reported by a member of the public to the BLM on 11/27/18. BLM notified XTO and XTO provided notice to Mike Bratcher, Maria Pruett, Jim Griswold at NMOCD and Jim Amos and Shelly Tucker at BLM on 11/29/18. Notification was provided by email by Bryan Foust.	

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

<input checked="" type="checkbox"/> The source of the release has been stopped.	
<input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment.	
<input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.	
<input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.	
Printed Name: <u>Kyle Littrell</u>	Title: <u>SH&E Coordinator</u>
Signature: 	Date: <u>12/11/18</u>
email: <u>kyle.littrell@xtoenergy.com</u>	Telephone: <u>432-221-7331</u>
OCD Only	
Received by: 	Date: <u>1/10/2019</u>

Incident ID	NAB1901038306
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Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	< 50 (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

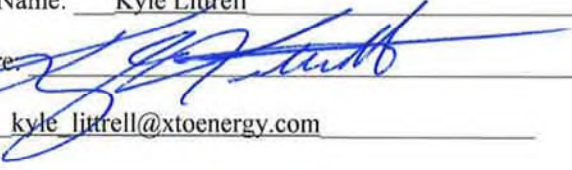
Characterization Report Checklist: *Each of the following items must be included in the report.*

- ☐ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☐ Field data
- ☐ Data table of soil contaminant concentration data
- ☐ Depth to water determination
- ☐ Determination of water sources and significant watercourses within 1/2-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☐ Photographs including date and GIS information
- ☐ Topographic/Aerial maps
- ☐ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

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I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.

Printed Name: Kyle Littrell Title: SH&E Coordinator
Signature:  Date: 12/11/18
email: kyle_littrell@xtoenergy.com Telephone: 432-221-7331

OCD Only

Received by:  Date: 1/10/2019

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Remediation Plan

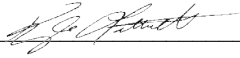
Remediation Plan Checklist: *Each of the following items must be included in the plan.*

- ☒ Detailed description of proposed remediation technique
- ☒ Scaled sitemap with GPS coordinates showing delineation points
- ☒ Estimated volume of material to be remediated
- ☒ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☒ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.

Printed Name: Kyle Littrell Title: SH&E Manager Supervisor
Signature:  Date: 10/2/2020
email: kyle_littrell@xtoenergy.com Telephone: 432-221-7331

OCD Only

Received by: _____ Date: _____

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: _____ Date: _____



LT Environmental, Inc.

3300 North "A" Street
Building 1, Unit 222
Midland, Texas 79705
432.704.5178

October 2, 2020

New Mexico Oil Conservation Division
District 2
811 South First Street
Artesia, New Mexico 88210

**RE: Supplemental Remediation Work Plan
PCA 53
Remediation Permit Number 2RP-5169
Eddy County, New Mexico**

To Whom It May Concern:

LT Environmental, Inc. (LTE), on behalf of XTO Energy, Inc. (XTO), is pleased to present the New Mexico Oil Conservation Division (NMOCD) with this Supplemental Remediation Work Plan (SRWP) for the PCA 53 site (Site). The Site is located in Unit K, Section 23, Township 23 South, Range 29 East, in Eddy County, New Mexico (Figure 1).

On November 27, 2018, the Bureau of Land Management (BLM) observed fluids in a pasture, which appeared to have emanated from an existing core hole associated with a neighboring potash mine. The fluid migrated along the ground surface to the north of the core hole and encompassed an area of approximately 189,230 square feet. XTO submitted a Release Notification Form C-141 (Form C-141) to NMOCD and the Site was assigned Release Permit (RP) Number 2RP-5169.

This SRWP summarizes remedial actions completed since March 20, 2020, following the submittal of the Remedial Investigation (RI) Report, dated March 20, 2020. NMOCD approved the RI Report on August 4, 2020. This SRWP also develops a framework to describe proposed remedial actions to address soil and groundwater conditions as they relate to residual subsurface impacts at the Site in order to comply with applicable New Mexico Administrative Codes (NMACs).

POST MARCH 20, 2020 REMEDIAL ACTIONS

A summary of remedial actions that have been conducted subsequent to the submittal of the RI Report on March 20, 2020 are described below.

Subsurface Soil

As proposed in the RI Report and subsequently approved by NMOCD, XTO continued with excavation of residual contaminated soil to the maximum extent practicable (MEP), which



concluded on May 11, 2020. In total, approximately 78,000 cubic yards of soil have been removed and disposed of offsite at an approved and permitted land farm. Excavation floor and sidewall samples were collected at an approved variance frequency of one composite sample for every 1,000 square feet and 500 square feet, respectively, as stipulated in NMOCD's October 23, 2019 Conditions of Approval (COA).

Composite confirmation soil samples were collected by depositing five aliquots of soil into a 1-gallon, resealable plastic bag and homogenizing the samples by thoroughly mixing. The mixture was divided into two resealable bags; one for field screening and the other for laboratory analysis.

Soil samples were placed into pre-cleaned glass jars, labeled with the location, date, time, sampler name, method of analysis, and immediately placed on ice. The soil samples were shipped at or below 4 degrees Celsius (°C) under strict chain-of-custody (COC) procedures to Xenco Laboratories (Xenco) in Carlsbad, New Mexico, for analysis of benzene, toluene, ethylbenzene, and total xylenes (BTEX) following United States Environmental Protection Agency (EPA) Method 8021B; total petroleum hydrocarbons – gasoline range organics (TPH-GRO), TPH – diesel range organics (DRO), and TPH – oil range organics (ORO) following EPA Method 8015M/D; and chloride following EPA Method 300.0.

Figure 2 depicts the location and analytical results of the excavation floor confirmation samples. Figure 3 depicts the analytical results and location of the excavation sidewall confirmation samples. Table 1 provides a summary of all soil confirmation analytical results. Laboratory analytical reports for the excavation soil samples collected after March 20, 2020 are included in Attachment 1; all other confirmation excavation soil samples were reported in the March 20, 2020 RI Report.

Attempts to effectively and efficiently remove residual soil impacts included mechanical and microbial means. Between January 22 and January 24, 2020, utilization of a jack hammer attachment to a track-hoe was made to excavate caliche, which resulted in a slow and ineffective method of breaking up the well-cemented/indurated caliche.

Alternatively, utilization of the microbial amendment Micro-Blaze® in soil with residual petroleum hydrocarbon concentrations exceeding the Closure Criteria was applied at the remaining areas containing elevated petroleum hydrocarbon concentrations. Below is a summary of Micro-Blaze® applications (6 to 8 percent [%] solution) that occurred within the excavation in areas not compliant with the Table 1 Closure Criteria for TPH:



Micro-Blaze® Application Summary

Date	Micro-Blaze® and Water Volume	Application Area
May 14, 2020	30 gallons	VFS16, VFS31, VFS96
May 18, 2020	30 gallons	VFS16, VFS31, VFS96
May 20, 2020	45 gallons	VFS155, VSW102, VSW103
May 26, 2020	45 gallons	VFS16, VFS31, VFS96
May 28, 2020	45 gallons	VSW155, VSW102, VSW103
June 3, 2020	50 gallons	VFS16, VFS31, VFS96
June 5, 2020	50 gallons	VSW155, VSW102, VSW103
September 2, 2020	45 gallons	VFS16, VFS31, VSW102, VSW103
September 4, 2020	45 gallons	VFS16, VFS31, VSW102, VSW103
September 10, 2020	45 gallons	VSW102 and VSW103

Following the application of Micro-Blaze®, soil in the failing 1,000 square foot grid were resampled. Based on laboratory analytical results, excavation floor and sidewall confirmation samples for BTEX and TPH are all compliant with the Table 1 Closure Criteria.

Of the 183 excavation floor samples collected (156 floor locations plus 27 resamples), contaminant concentrations are below the NMOCD Table 1 Closure Criteria in all samples with the exception of variance floor samples VFS69, VFS86, VFS147, VFS148, and VFS150, all located between 8 feet and 20 feet below ground surface (bgs). These areas with remaining elevated chloride concentrations exist within dolomite and/or caliche that prevented the excavator from effectively removing impacted material or are deeper than 20 feet bgs.

Of the 112 excavation sidewall soil samples collected (103 floor locations plus 9 resamples), contaminant concentrations are below the NMOCD Table 1 Closure Criteria in all samples with the exception of variance sidewall samples VSW102 (north side of release point) and VSW103 (south side of release point), which exceed for chloride. Both samples and subsequent samples exceed the Table 1 Closure Criteria for chloride and variance sidewall sample VSW103(B) exceeds for the TPH reclamation requirement; however, Micro-Blaze® application events have reduced the total TPH concentration by 85.3%. These two sidewall samples are located directly adjacent to the point of release and removal of any additional soil could compromise the integrity of the core hole and as a result, the sidewall excavations were completed to the MEP.

Following the completion of excavation activities on May 6, 2020, commencement of backfilling the excavation began with non-waste containing caliche to approximately 4 feet bgs and topsoil to the ground surface. Figure 4 depicts the Site's backfill progress to-date. Backfilling is currently ongoing with a majority of the excavation (approximately 85%) backfilled to 4 feet bgs or to the ground surface.



Shallow Groundwater Monitoring / Product Recovery

As described in the March 20, 2020 RI Report, due to the presence of phase separated hydrocarbon (PSH) in several shallow monitoring wells, remedial efforts to remove PSH to the MEP have been conducted weekly. Prior to commencing PSH recovery, depth to water and depth to PSH measurements were collected in known PSH-containing monitoring wells and periodically in the rest of the monitoring wells to verify PSH had not migrated beneath the Site. Depth to water measurements were collected utilizing an oil-water interface probe capable of measuring product and water to 0.01-feet, which were then converted to elevations using the surveyed top-of-casing data for each monitoring well. When PSH was present in the monitoring well, a density correction of 0.8 was used to calculate the water elevations.

As described in the RI Report, shallow groundwater is present within fractures and voids of the lower portion of the dolomite strata. The fractures are variable and often times are disconnected and as a result, groundwater elevations vary beneath the Site and do not represent a continuous shallow groundwater aquifer, but more like a semi-connected “bathtub”. Figure 5 illustrates the general location of groundwater related to the Site and lists shallow groundwater elevations and product thicknesses measured on August 17, 2020. Depth to water and PSH thickness measurements are presented on Table 2.

PSH is present in monitoring wells BH14, BH27, BH37, and BH51 (historically monitoring well BH26 contained PSH, but currently does not). In general, the product thickness in all monitoring wells has decreased between November 2019 and present due to product and fluid recovery efforts implemented once PSH was initially detected in shallow monitoring well BH14.

Initial PSH recovery efforts included the evacuation of approximately 43,401 gallons (1,033 barrels) of fluid/PSH from the shallow water-bearing zone through hand bailing, mechanical pumping, and hydro-vacuuming events. Due to the large discrepancy of water-to-PSH recovery, recovery of PSH utilizing a hydro-vac truck did not appear to be the correct method of product recovery. As a result, beginning in February 2020, hydro-vacuuming activities ceased and PSH recovery was performed manually using disposable bailers. PSH recovery initially was performed three days per week, which has since decreased to two days and then one day per week, based on PSH thickness and volume recoveries. In addition to hand bailing, the use of adsorbent socks to recover additional PSH was implemented between March 16 and June 29, 2020. The use of the adsorbent socks ceased based on the limited recovery of PSH. Heavy rain events were observed in August 2020 and a slight increase in product thicknesses appeared to correspond during that timeframe. In response, XTO increased the frequency of product recovery events; however, recovered volumes were similar in magnitude. As of September 1, 2020, approximately 65.78 gallons of PSH has been recovered from shallow non-protectable groundwater beneath the Site.



Attached Graph 1 shows product thickness over time and displays trendlines for each well. Table 3 summarizes PSH recovery volumes.

Deep Groundwater Monitoring

Deep groundwater continues to be monitored on a quarterly basis through sampling monitoring wells MW01 through MW03. Following the February 2020 sampling event summarized in the RI Report, LTE conducted sampling events on May 18, 2020 and August 19, 2020.

During each sampling event and prior to purging/sampling, depth to water was measured with an oil-water interface probe. Sampling was conducted using standard collection procedures through the use of disposable bailers to minimize cross contamination. Each monitoring well was purged prior to sample collection by removing three casing volumes of water or purging until the monitoring well ran dry.

During purging activities, LTE recorded water-quality parameters of pH, electrical conductivity (EC), temperature, dissolved oxygen (DO), and oxidation-reduction potential (ORP) of the fluid/water with a YSI 556 handheld multi-parameter probe or an equivalent instrument. Samples were submitted under strict COC protocol to Xenco for analysis of BTEX.

BTEX concentrations in groundwater were not detected above the laboratory reporting limits during the May and August 2020 sampling events, which is consistent with past sampling events. BTEX has not been detected in deep groundwater beneath the Site.

Deep groundwater elevations and interpreted isocontours for the May 2020 and August monitoring events have been plotted on Figures 6 and 7, respectively. Deep groundwater analytical results for the May 2020 and August 2020 monitoring events are depicted on Figure 8. Table 4 summarizes of analytical results for groundwater sampling events. Attachment 1 includes the May 2020 and August 2020 laboratory analytical reports.

Stock Well Monitoring

According to the USGS database, stock well 321717103561001 is the nearest accessible water well to the Site and is located approximately 6,820 feet east of the release location (Latitude 32°17'17" N, Longitude 103°56'10" W NAD27). LTE attempted the collection of a water sample from the stock tank fed by the stock well on March 12, June 16, and August 11, 2020 for laboratory analysis of BTEX, TPH-GRO, TPH-DRO, TPH-ORO, and chloride. The stock tank was inaccessible during the June 2020 sampling event due to the presence of bees and as a result, no water sample was collected for that sampling event.

Laboratory analytical results for the March and August 2020 sampling events indicated BTEX, TPH-GRO, TPH-DRO, and TPH-ORO, chloride and TDS were consistent with prior sampling event



results. Stock well results are summarized in Table 5, with laboratory analytical reports included in Attachment 1.

NMOCD RESPONSE TO RI REPORT

XTO received the following email correspondence from NMOCD on August 4, 2020:

"To whom it may concern: The OCD accepts the data provided in the remedial investigation report and will accept the report in the fee application system. However, the division believes additional investigation must take place to determine the protectability of all shallow groundwaters at this site. At this time, there is not enough evidence to support the claim that the groundwater encountered at this site is not protectable. The division supports XTO's efforts to continue to investigate the exposure pathways of this release and other releases related to the Remuda South 25 101 H fracking event. With what we currently understand of this release, the Division is considering the need to evaluate these incidents under 19.15.30 NMAC. Please let me know if you have any questions. Thanks, Cristina Eads | 505-670-5601 "

If you are concerned about receiving this email or have any other questions,

please feel free to contact our Santa Fe OCD office.

*New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505*

EXPOSURE PATHWAYS

Based on the nature and extent of contamination, site receptors, and Closure Criteria described in the RI Report and additional data collected since March 2020, the exposure pathways at the Site are described below.

Groundwater Ingestion

Naturally occurring water within the shallow water-bearing zone contains naturally high TDS concentrations greater than 10,000 mg/L, excluding its use for human consumption or agricultural/irrigation uses and therefore not protectable under 20.6.2 NMAC. Additionally, the gypsum/clay units present beneath the dolomite (water-bearing zone) act as confining units between the shallow and deep water-bearing zones, preventing the shallow groundwater impacts from vertically migrating into the deeper freshwater aquifer. Because of this, the groundwater-ingestion pathway at the Site does not appear to be complete as it relates to human and/or ecological receptors.



Surficial Soil/Root Zone

Accessible impacted soil within 4 feet of ground surface has been removed with the remedial excavation, mitigating risk and direct contact, ingestion, and inhalation exposure pathways to human and ecological receptors at the Site. Limited residual TPH and chloride are present directly adjacent to the core hole, which accounts for approximately 283 cubic yards of soil in the top 4 feet; however, the removal of this impacted soil could compromise the integrity of the core hole. Limited TPH in soil will continue to naturally attenuate with the addition of residual Micro-Blaze® amendment, naturally occurring microbes, volatilization, and oxidation. Limited residual chloride containing soil surrounding the core hole represents a low risk to vegetation health over time as the chloride will eventually migrate downward below the root zone and vegetation regrowth will occur over time. As such, the surficial soil/root zone pathway does not appear to be complete as it relates to human and/or ecological receptors.

Subsurface Soil Leaching to Groundwater

Limited areas of subsurface impacted soil/rock remain at the Site as depicted on Figure 2. It is possible for contaminants in these shallow areas to vertically migrate through leaching; however, there is over 20 feet of soil overburden between the bottom of the shallow-zone soil impacts and the closest water-bearing zone at the Site, limiting the potential for migration to the shallow water-bearing zone. Additionally, shallow water at the Site is not protectable due to naturally high TDS concentrations. Approximately 35 feet of high-plastic clay and gypsum/anhydrite are present below the shallow groundwater, preventing any further migration of contaminants to the deeper groundwater aquifer. Because of these factors, the leaching-to-groundwater pathway does not appear to be complete as it relates to human and/or ecological receptors.

PROPOSED REMEDIAL ACTIONS

Based on the conceptual site model (CSM) described in the RI Report, incomplete exposure pathways described above, and NMOCD's response to the RI Report, proposed additional actions for the Site are outlined below.

Subsurface Soil

Based on limited success removing residual soil impacts utilizing a jack hammer attachment to the track hoe within dolomite and/or indurated caliche or at depths greater than 20 feet bgs, excavation of residual subsurface soil has been completed to the MEP. Final applications of Micro-Blaze® have been completed on September 10, 2020. This approach was previously proposed in the RI Report which was approved by NMOCD. Following the last Micro-Blaze® application, the entire excavation is being backfilled to the ground surface. Once the excavation and surrounding impacted area is recontoured, reseeded will commence, likely in October or November 2020 when temperatures are cooler and fall precipitation will aid in the growth of new



vegetation. The Site will be inspected in Spring 2021 to determine if a second round of seeding is necessary to provide at least 70% regrowth of vegetation to match the Site's surroundings.

Shallow Groundwater Monitoring / Product Recovery

NMOCD indicated in their August 3, 2020 response to the RI Report that additional shallow groundwater assessment needs to be completed to confirm non-protectable status. As a result, additional assessment activities to confirm the non-protectable status of shallow groundwater beneath the Site has been initiated in September 2020. XTO anticipates the completion of assessment activities by December 31, 2020.

While product recovery is limited due to the semi-disconnected nature of dolomite fractures where fluid has been observed, XTO is committed to reducing the residual PSH to the MEP. Based on current product thicknesses in four monitoring wells and low recovery, XTO proposes to continue product recover via disposal bailers on a frequency of once per week, unless Site conditions warrant an increase in frequency, through the end of 2020, at which time product recovery will be re-evaluated in conjunction with additional site assessment data.

Deep Groundwater Monitoring

A total of five sampling events have been completed to assess the deep groundwater aquifer beneath the Site. BTEX analytical results for the three monitoring wells (MW01 through MW03) indicate petroleum hydrocarbon impacts at the Site have not adversely affected the deep groundwater. XTO proposes conducting a 4th quarter 2020 sampling event, tentatively scheduled for November 2020. Groundwater samples will be analyzed for BTEX and laboratory analytical results will be compared to the previous five sampling events.

Stock Well Monitoring

The nearby stock well has been sampled seven times since December 2018. Laboratory analytical results have remained consistent for chloride and TDS and have not detected BTEX in water over those seven sampling events. XTO proposes to conduct a 4th quarter 2020 sampling event, tentatively scheduled for November 2020, to verify groundwater concentrations remain consistent and not impacted by the Site.

A summary report describing the above remedial actions will be submitted to NMOCD by February 2, 2021. Should NMOCD require more than 30 days to review and respond to this report, XTO reserves the right to modify the proposed schedule.



NMOCD District 2
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LTE, on behalf of XTO, requests approval of this Work Plan for RP Number 2RP-5169. If you have any questions or comments, please do not hesitate to contact Mr. Kyle Littrell with XTO at (970) 317-1867.

Sincerely,

LT ENVIRONMENTAL, INC.

A handwritten signature in black ink, appearing to read "Daniel R. Moir".

Daniel R. Moir, P.G.
Senior Geologist

A handwritten signature in black ink, appearing to read "Ashley L. Ager".

Ashley Ager, P.G.
Senior Geologist

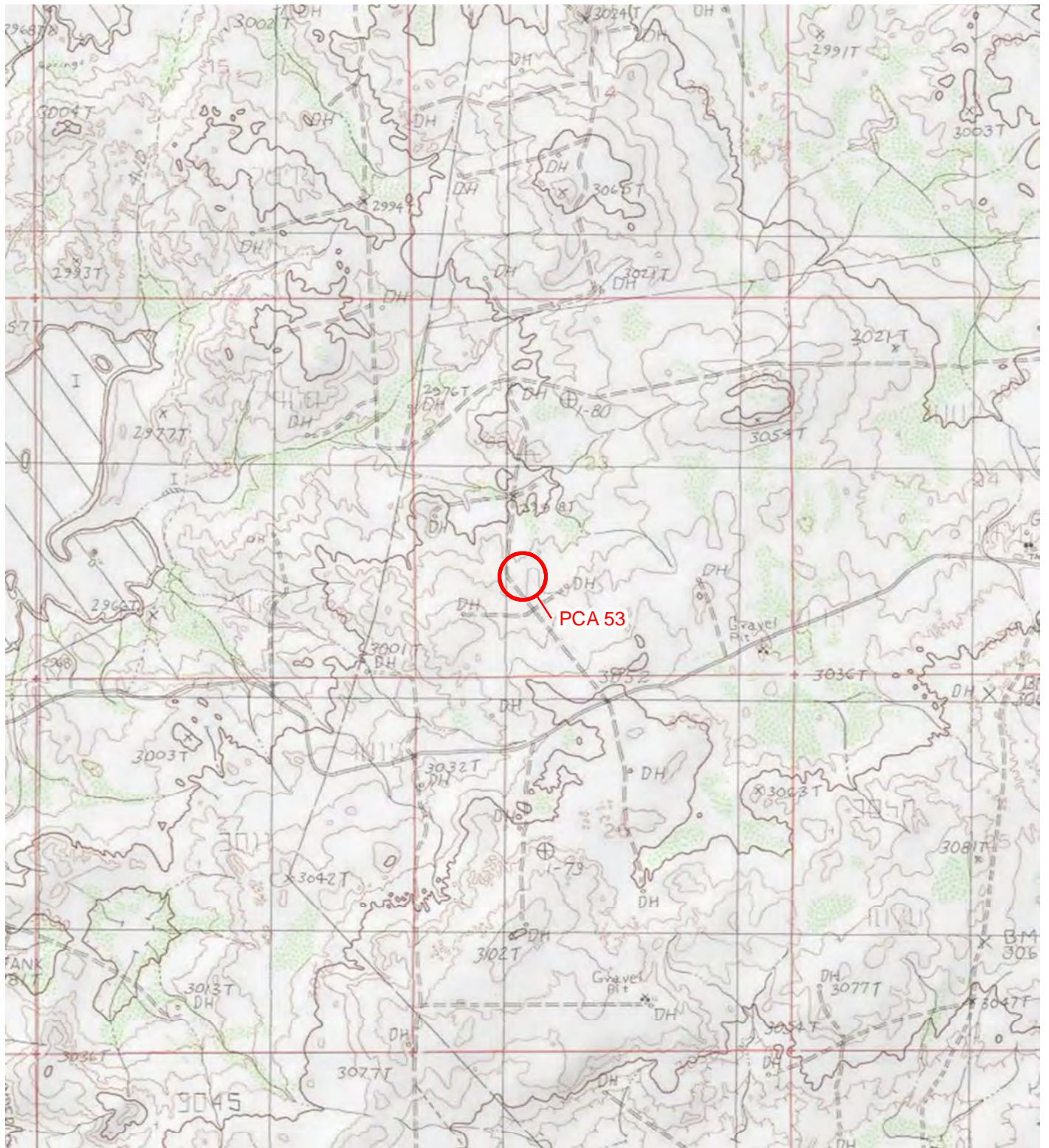
cc: Kyle Littrell, XTO
Bradford Billings, NMOCD
Robert Hamlet, NMOCD
Jim Amos, BLM

Attachments:

Figure 1	Site Location Map
Figure 2	Confirmation Soil Sampling – Excavation Floor
Figure 3	Confirmation Soil Sampling – Excavation Sidewall
Figure 4	Backfill Progress
Figure 5	Shallow Groundwater Elevation and Product Thickness Map
Figure 6	Deep Groundwater Potentiometric Map – May 18, 2020
Figure 7	Deep Groundwater Potentiometric Map – August 19, 2020
Figure 8	Deep Groundwater Analytical Results
Table 1	Excavation Confirmation Soil Sampling Analytical Results
Table 2	Groundwater Elevations and Thickness of Phase-Separated Hydrocarbons
Table 3	Product Recovery Estimates
Table 4	Shallow and Deep Water Analytical Results
Table 5	Stock Tank Water Analytical Results
Graph 1	Product Thickness
Attachment 1	Laboratory Analytical Reports

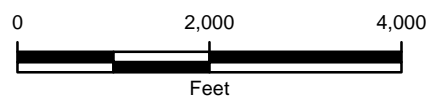
FIGURES



**LEGEND**

 SITE LOCATION

IMAGE COURTESY OF ESRI/USGS

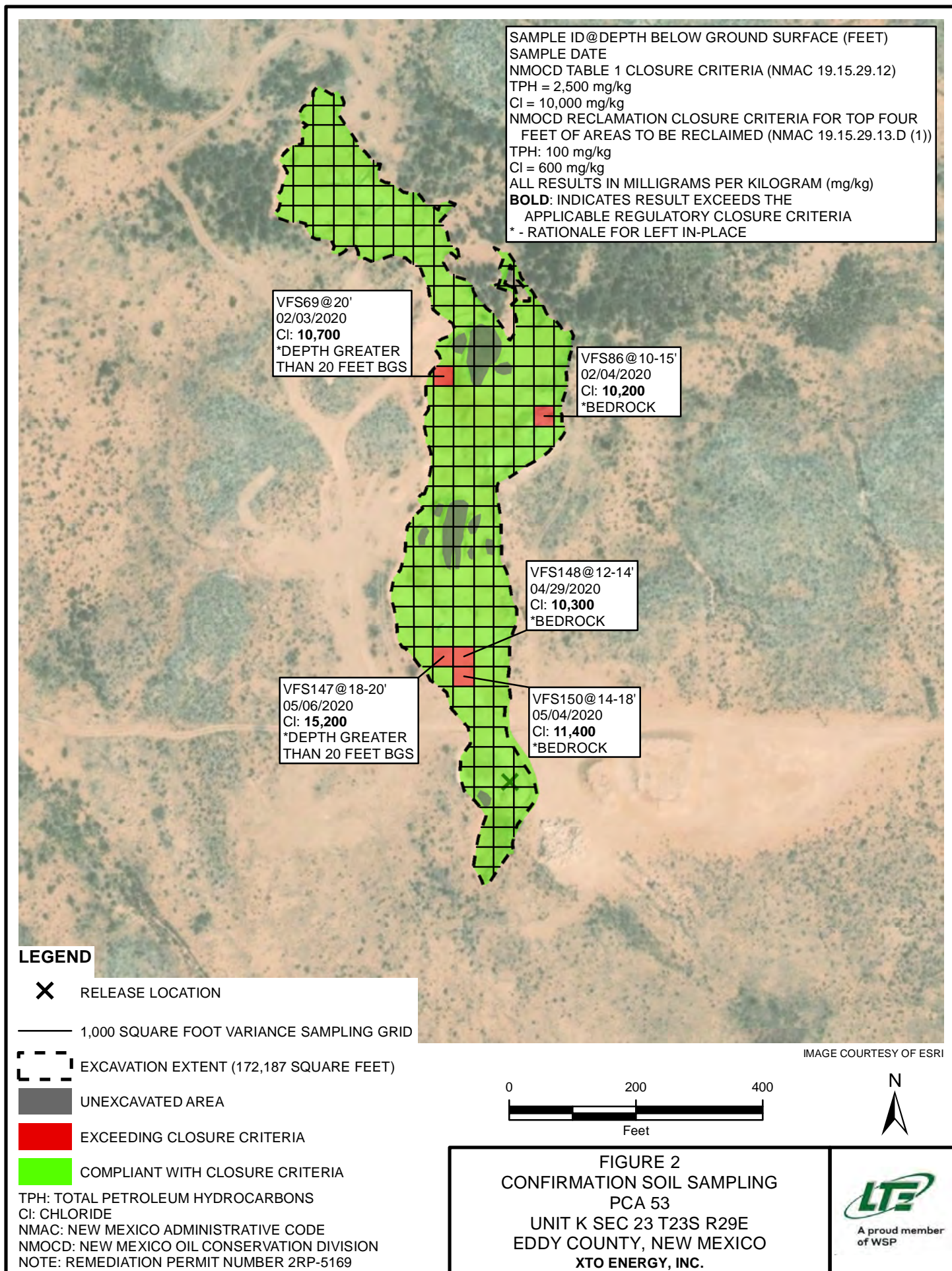


NOTE: REMEDIATION PERMIT
NUMBER 2RP-5169

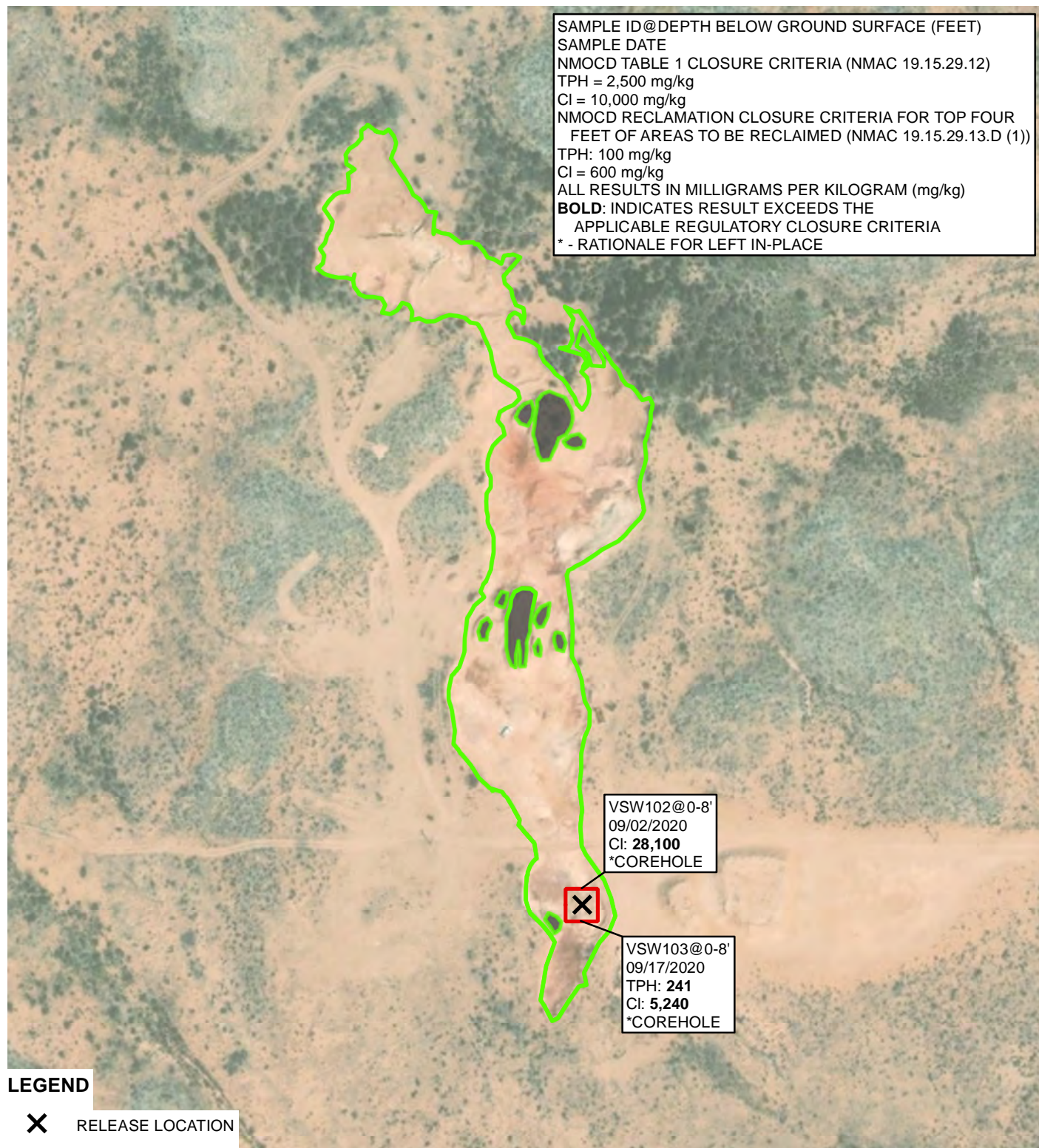
FIGURE 1
SITE LOCATION MAP
PCA 53
UNIT K SEC 23 T23S R29E
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.



P:\XTO Energy\GIS\MXD\012918187_PCA 53\012918187_FIG01_SL_MAP_5169.mxd



SAMPLE ID@DEPTH BELOW GROUND SURFACE (FEET)
 SAMPLE DATE
 NMOCD TABLE 1 CLOSURE CRITERIA (NMAC 19.15.29.12)
 TPH = 2,500 mg/kg
 Cl = 10,000 mg/kg
 NMOCD RECLAMATION CLOSURE CRITERIA FOR TOP FOUR
 FEET OF AREAS TO BE RECLAIMED (NMAC 19.15.29.13.D (1))
 TPH: 100 mg/kg
 Cl = 600 mg/kg
 ALL RESULTS IN MILLIGRAMS PER KILOGRAM (mg/kg)
BOLD: INDICATES RESULT EXCEEDS THE
 APPLICABLE REGULATORY CLOSURE CRITERIA
 * - RATIONALE FOR LEFT IN-PLACE



LEGEND



RELEASE LOCATION

CONFIRMATION SIDEWALL SAMPLES WITH
 CONCENTRATIONS EXCEEDING APPLICABLE
 CLOSURE CRITERIA

CONFIRMATION SIDEWALL SAMPLES IN
 COMPLIANCE WITH APPLICABLE
 CLOSURE CRITERIA

UNEXCAVATED AREA

TPH: TOTAL PETROLEUM HYDROCARBONS

Cl: CHLORIDE

NMAC: NEW MEXICO ADMINISTRATIVE CODE

NMOCD: NEW MEXICO OIL CONSERVATION DIVISION

NOTE: REMEDIATION PERMIT NUMBER 2RP-5169

IMAGE COURTESY OF ESRI

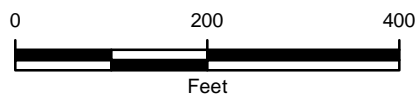
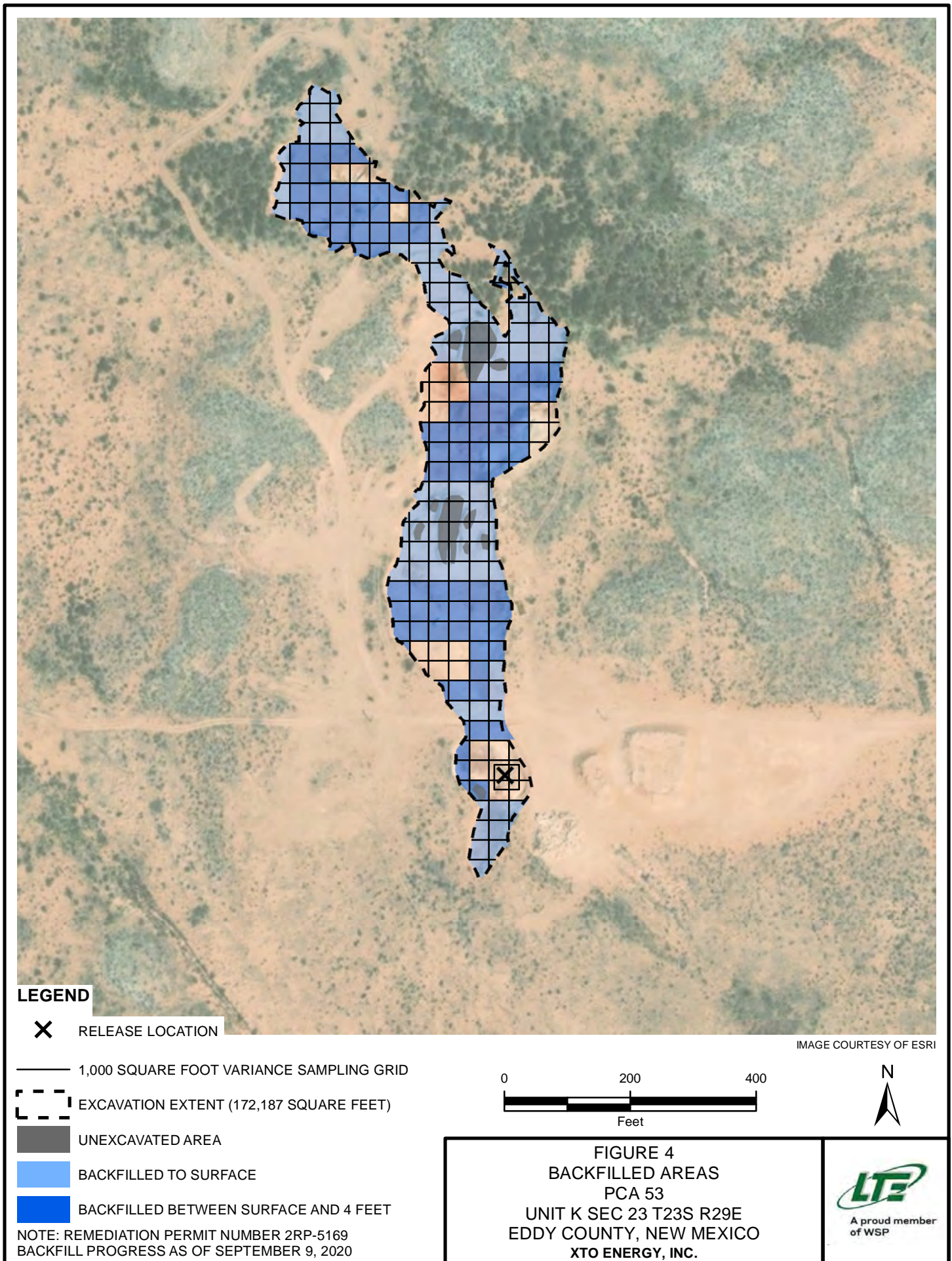
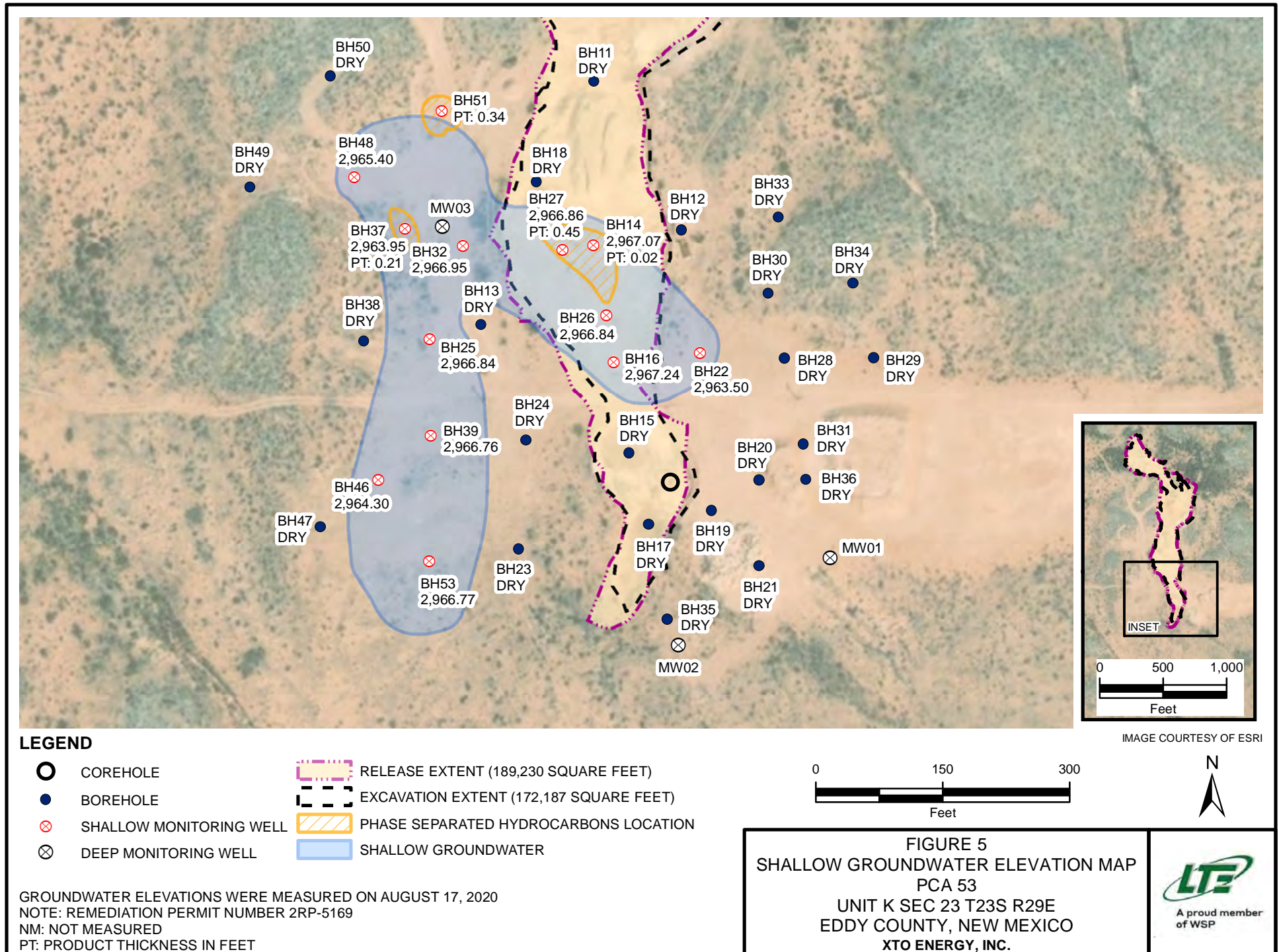


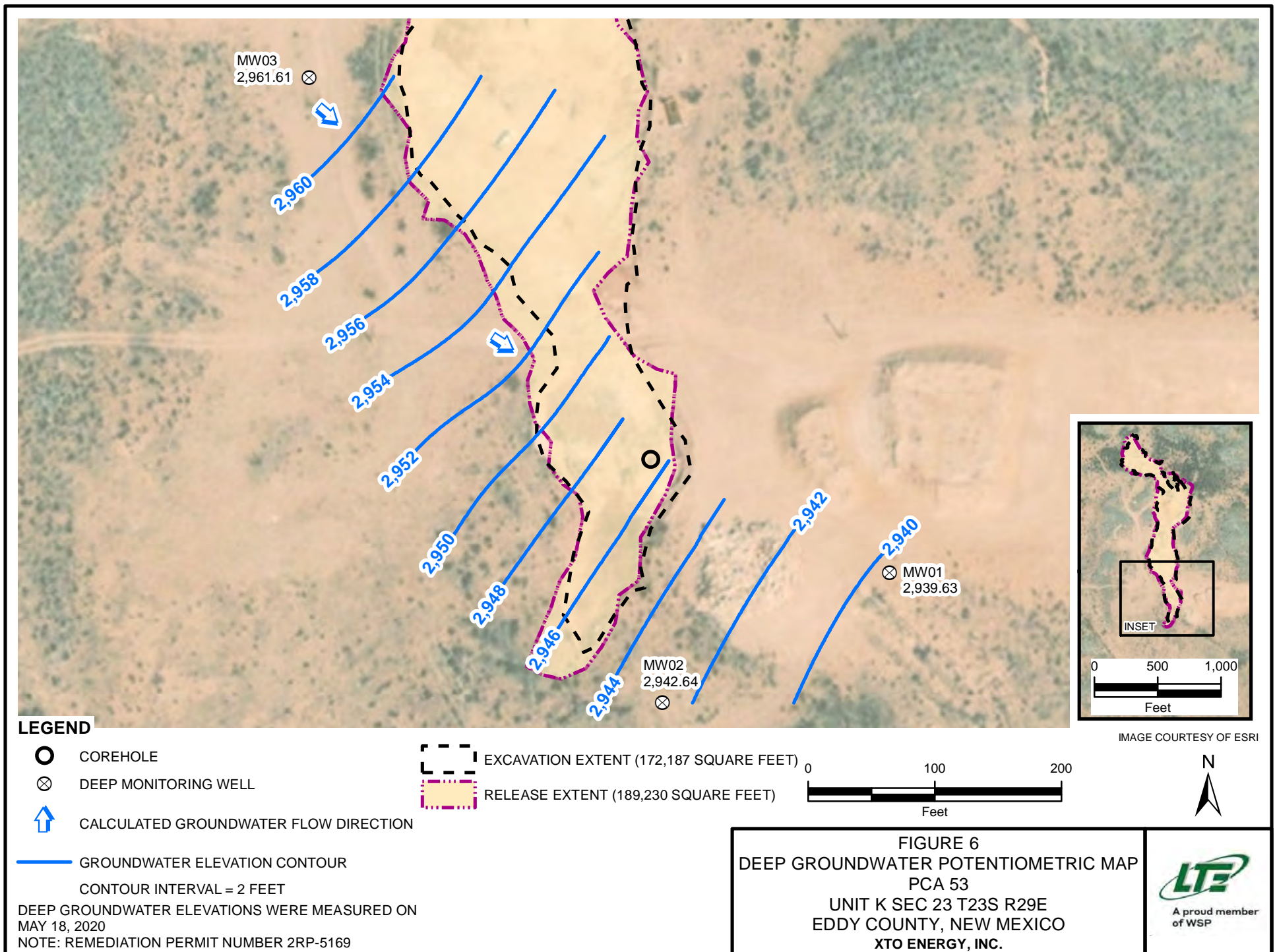
FIGURE 3
 CONFIRMATION SOIL SAMPLING
 PCA 53
 UNIT K SEC 23 T23S R29E
 EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.

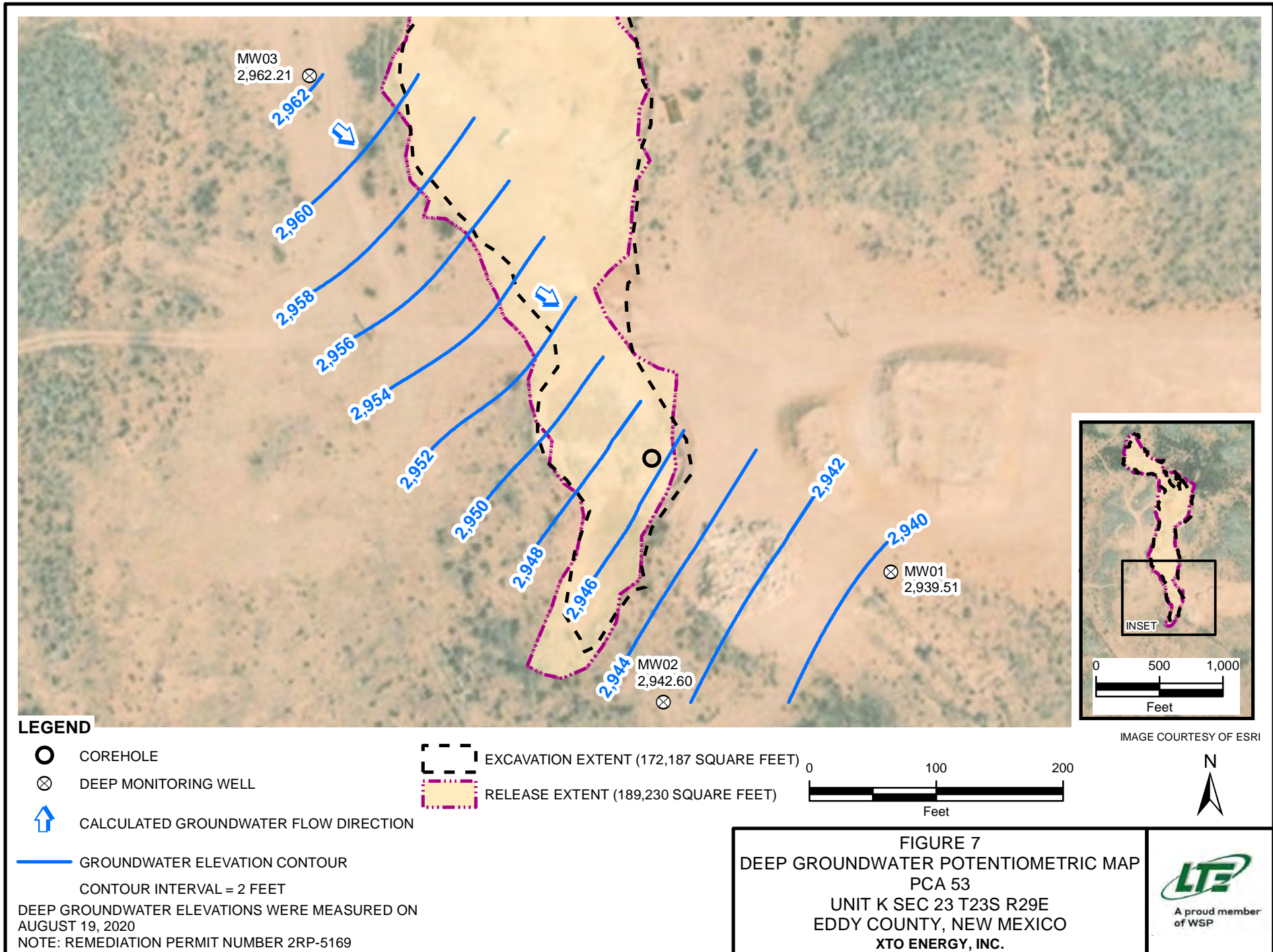


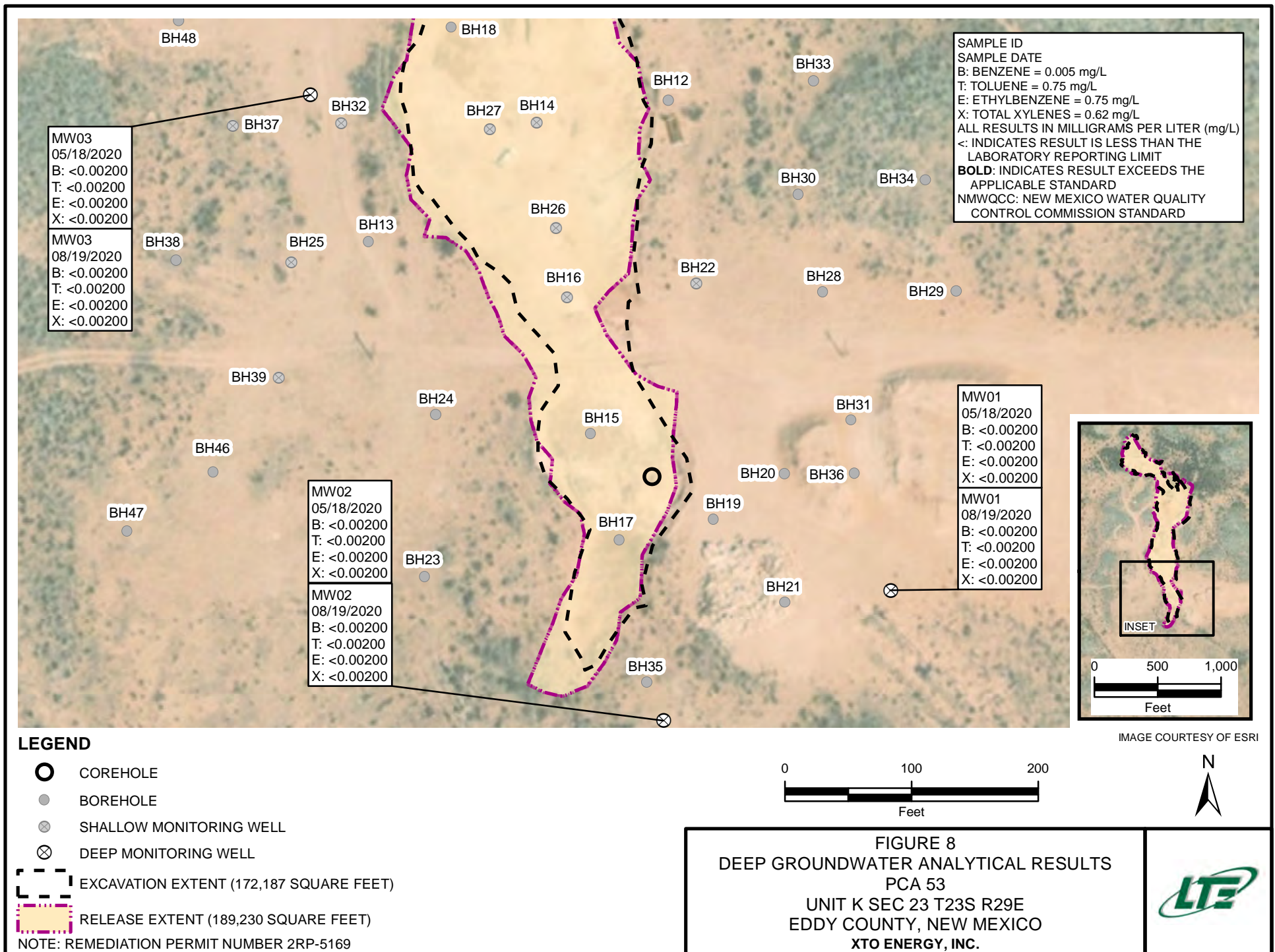


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TABLES



TABLE 2
EXCAVATION CONFIRMATION SOIL ANALYTICAL RESULTS

PCA 53
REMEDATION PERMIT NUMBER 2RP-5169
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.

Sample Name	Sample Depth (feet bgs)	Sample Date	PID Screening (ppm)	Chloride Screening (ppm)	Benzene (mg/kg)	Total BTEX (mg/kg)	GRO (mg/kg)	DRO (mg/kg)	ORO (mg/kg)	Total GRO+DRO (mg/kg)	TPH (mg/kg)	Chloride (mg/kg)
CONFIRMATION FLOOR SAMPLES												
VFS01	2	11/8/2019	0.1	<120	<0.00101	<0.00101	<49.9	<49.9	<49.9	<49.9	<49.9	82.2
VFS02	2 - 4	11/8/2019	0.1	<120	<0.00100	<0.00100	<50.0	<50.0	<50.0	<50.0	<50.0	108.0
VFS03	4	11/8/2019	0.4	<120	<0.000996	<0.000996	<50.2	<50.2	<50.2	<50.2	<50.2	99.4
VFS04	2 - 4	11/8/2019	0.1	<120	<0.00101	<0.00101	<49.8	<49.8	<49.8	<49.8	<49.8	180.0
VFS05	4	11/8/2019	0.1	<120	<0.00101	<0.00101	<50.3	<50.3	<50.3	<50.3	<50.3	162.0
VFS06	4	11/8/2019	0.1	<120	<0.00101	<0.00101	<50.2	<50.2	<50.2	<50.2	<50.2	112.0
VFS07	8	11/8/2019	0.7	<120	<0.00101	<0.00101	<50.0	<50.0	<50.0	<50.0	<50.0	37.1
VFS08	8	11/8/2019	0.1	<120	<0.00101	<0.00101	<49.9	<49.9	<49.9	<49.9	<49.9	41.6
VFS09	8 - 9	11/12/2019	2.5	<120	<0.000992	<0.000992	<50.1	<50.1	<50.1	<50.1	<50.1	44.6
VFS10	8	11/8/2019	8.9	<120	<0.00101	<0.00101	<50.2	<50.2	<50.2	<50.2	<50.2	51.3
VFS11	8	11/8/2019	1.0	<120	<0.00101	<0.00101	<50.2	<50.2	<50.2	<50.2	<50.2	77.2
VFS12	8	11/8/2019	0.2	<120	<0.00100	<0.00100	<50.2	<50.2	<50.2	<50.2	<50.2	22.8
VFS13	8	11/8/2019	0.1	<120	<0.000998	<0.000998	<49.9	<49.9	<49.9	<49.9	<49.9	56.4
VFS13A	10 - 13	4/7/2020	49.5	436	<0.00200	<0.00200	<50.1	<50.1	<50.1	<50.1	<50.1	754
VFS14	8	11/8/2019	70.4	<120	<0.00100	<0.00100	<50.3	189.0	<50.3	189.0	189.0	73.3
VFS14A	10	11/15/2019	0.7	<120	<0.00100	<0.00100	<50.0	<50.0	<50.0	<50.0	<50.0	15.3
VFS15	12	11/13/2019	546.5	<120	0.00215	0.920	202	1,520.0	124.0	1,720.0	1,850.0	230.0
VFS15A	20	2/3/2020	2.1	<120	<0.00200	<0.00200	<49.9	<49.9	<49.9	<49.9	<49.9	59.0
VFS16	12	11/13/2019	529.0	<120	0.00122	1.05	255	1,940.0	152.0	2,200.0	2,350.0	801.0
VFS16A	20	2/3/2020	235.8	235	<0.00200	0.118	51.0	1,050.0	91.2	1,100.0	1,190.0	224.0
VFS16B	20	6/10/2020	5.2	<120	<0.00200	<0.00200	<50.1	1,750.0	187	1,750.0	1,940.0	41.4
VFS16C	20	9/2/2020	1.6	<120	<0.00199	<0.00199	<49.9	484	67.9	484	552	30.7
VFS17	8	11/8/2019	24.1	<120	<0.000998	<0.000998	<50.2	<50.2	<50.2	<50.2	<50.2	56.0
VFS18	8	11/8/2019	2.1	<120	<0.00101	<0.00101	<50.2	<50.2	<50.2	<50.2	<50.2	74.1
VFS19	8	11/8/2019	7.1	<120	<0.00100	<0.00100	<50.1	<50.1	<50.1	<50.1	<50.1	105.0
VFS20	10 - 12	11/12/2019	8.1	196	<0.000998	<0.000998	<50.2	<50.2	<50.2	<50.2	<50.2	191.0
VFS21	9 - 12	11/8/2019	71.2	492	<0.000988	<0.000988	<49.8	424.0	<49.8	424.0	424.0	748.0
VFS22	4 - 10	11/13/2019	9.8	<120	<0.00101	<0.00101	<50.2	<50.2	<50.2	<50.2	<50.2	40.2
VFS23	8	11/8/2019	36.7	<120	<0.00100	<0.00100	<50.0	262.0	<50.0	262.0	262.0	93.3
VFS24	8	11/8/2019	2.6	<120	<0.00100	<0.00100	<50.2	<50.2	<50.2	<50.2	<50.2	117.0
VFS25	6	11/8/2019	1.8	<120	<0.00100	<0.00100	<49.8	<49.8	<49.8	<49.8	<49.8	45.5
VFS26	6	11/8/2019	1.0	<120	<0.00101	<0.00101	<49.8	<49.8	<49.8	<49.8	<49.8	37.9
VFS27	7	11/13/2019	185.0	<120	<0.000988	0.0835	<49.9	549.0	61.7	549.0	611.0	68.4
VFS27A	10 - 15	11/21/2019	2.6	<120	<0.00198	<0.00198	<49.8	147.0	<49.8	147.0	147.0	107.0
VFS27B	10 - 18	1/8/2020	0.6	<120	<0.00200	<0.00200	<50.0	<50.0	<50.0	<50.0	<50.0	31.4
VFS28	7	11/13/2019	58.0	560	<0.000992	0.0147	<49.8	421.0	<49.8	421.0	421.0	49.4
VFS28A	8 - 10	11/21/2019	2.3	436	<0.00200	<0.00200	<49.9	<49.9	<49.9	<49.9	<49.9	494.0
VFS28B	10 - 12	1/8/2020	1.4	<120	<0.00200	<0.00200	<50.0	<50.0	<50.0	<50.0	<50.0	22.9



TABLE 2
EXCAVATION CONFIRMATION SOIL ANALYTICAL RESULTS

PCA 53
REMEDIATION PERMIT NUMBER 2RP-5169
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.

Sample Name	Sample Depth (feet bgs)	Sample Date	PID Screening (ppm)	Chloride Screening (ppm)	Benzene (mg/kg)	Total BTEX (mg/kg)	GRO (mg/kg)	DRO (mg/kg)	ORO (mg/kg)	Total GRO+DRO (mg/kg)	TPH (mg/kg)	Chloride (mg/kg)
VFS29	7 - 15	11/8/2019	55.7	761	<0.000992	<0.000992	<50.3	<50.3	<50.3	<50.3	<50.3	161.0
VFS30	5	11/8/2019	6.1	<120	<0.00101	<0.00101	<50.1	<50.1	<50.1	<50.1	<50.1	356.0
VFS31	5	11/13/2019	785.0	<120	0.01	1.62	1,120	4,190.0	298.0	5,310.0	5,610.0	1,190.0
VFS31A	8	2/3/2020	149.6	1,187	<0.0143	0.673	83.6	2,450.0	223.0	2,530.0	2,760.0	1,230.0
VFS31B	8	6/10/2020	15.4	<3111	<0.0105	<0.0105	<50.2	2,000.0	239	2,000.0	2,240.0	671
VFS31C	8	9/2/2020	16.0	1,000	<0.00198	<0.00198	<50.0	540	81.4	540	621	1,400
VFS32	1 - 4	11/13/2019	0.8	694	<0.00101	<0.00101	<49.8	<49.8	<49.8	<49.8	<49.8	255.0
VFS33	1	11/8/2019	2.1	<120	<0.00100	<0.00100	<49.9	<49.9	<49.9	<49.9	<49.9	67.0
VFS34	4 - 7	11/8/2019	132.6	<120	<0.00100	<0.00100	<50.1	387.0	<50.1	387.0	387.0	68.9
VFS34A	5 - 10	11/21/2019	2.1	<120	<0.00201	<0.00201	<49.9	<49.9	<49.9	<49.9	<49.9	36.0
VFS34B	5 - 12	1/8/2020	0.5	<120	<0.00201	<0.00201	<49.8	<49.8	<49.8	<49.8	<49.8	35.1
VFS35	4 - 7	11/13/2019	30.7	<120	<0.000992	0.0173	<50.0	266.0	53.1	266.0	319.0	1,570.0
VFS35A	10 - 12	11/21/2019	1.2	<120	<0.00199	<0.00199	<49.8	<49.8	<49.8	<49.8	<49.8	22.5
VFS36	4 - 5	11/8/2019	17.9	<120	<0.000994	<0.000994	<50.3	<50.3	<50.3	<50.3	<50.3	300.0
VFS37	4 - 5	11/8/2019	14.1	<120	<0.00101	<0.00101	<49.8	<49.8	<49.8	<49.8	<49.8	215.0
VFS38	4	11/8/2019	12.8	<120	<0.00101	<0.00101	<49.8	<49.8	<49.8	<49.8	<49.8	71.8
VFS39	1 - 4	11/8/2019	2.6	<120	<0.000990	<0.000990	<50.0	<50.0	<50.0	<50.0	<50.0	45.2
VFS40	1 - 3	11/8/2019	2.1	<120	<0.000990	<0.000990	<50.1	<50.1	<50.1	<50.1	<50.1	147.0
VFS41	3 - 4	11/8/2019	1.1	<120	<0.00101	<0.00101	<50.2	<50.2	<50.2	<50.2	<50.2	324.0
VFS42	4	11/8/2019	2.1	<120	<0.00101	<0.00101	<49.9	<49.9	<49.9	<49.9	<49.9	44.8
VFS43	4	11/8/2019	1.1	<120	<0.00101	<0.00101	<50.0	<50.0	<50.0	<50.0	<50.0	270.0
VFS44	4	11/8/2019	1.1	436	<0.00101	<0.00101	<49.9	<49.9	<49.9	<49.9	<49.9	304.0
VFS45	1 - 4	11/8/2019	1.0	<120	<0.00100	<0.00100	<50.2	<50.2	<50.2	<50.2	<50.2	58.6
VFS46	7	11/13/2019	0.9	<120	<0.00100	<0.00100	<50.3	<50.3	<50.3	<50.3	<50.3	73.4
VFS47	7	11/13/2019	0.9	<120	<0.000998	<0.000998	<50.3	<50.3	<50.3	<50.3	<50.3	120.0
VFS48	7	11/13/2019	60.3	196	<0.000992	0.00445	<49.9	406.0	<49.9	406.0	406.0	426.0
VFS48A	7 - 10	11/20/2019	3.5	1,080	<0.00199	<0.00199	<50.0	<50.0	<50.0	<50.0	<50.0	1,200.0
VFS48B	6 - 12	12/3/2019	0.8	<120	<0.00198	<0.00198	<50.1	<50.1	<50.1	<50.1	<50.1	387.0
VFS49	7	11/13/2019	10.0	<120	<0.000996	<0.000996	<50.3	70.4	<50.3	70.4	70.4	41.2
VFS50	7	11/13/2019	1.5	<120	<0.000998	<0.000998	<50.2	<50.2	<50.2	<50.2	<50.2	87.7
VFS51	7	11/13/2019	0.9	<120	<0.00100	<0.00100	<50.1	<50.1	<50.1	<50.1	<50.1	59.4
VFS52	5	11/20/2019	0.9	<120	<0.00202	<0.00202	<50.0	<50.0	<50.0	<50.0	<50.0	33.7
VFS53	5	11/20/2019	0.5	<120	<0.00198	<0.00198	<49.9	<49.9	<49.9	<49.9	<49.9	161.0
VFS54	4	11/20/2019	0.9	<120	<0.00202	<0.00202	<49.8	<49.8	<49.8	<49.8	<49.8	61.9
VFS55	6	11/20/2019	0.7	<120	<0.00199	<0.00199	<50.0	<50.0	<50.0	<50.0	<50.0	10.6
VFS56	3	11/20/2019	0.9	<120	<0.00200	<0.00200	<49.8	<49.8	<49.8	<49.8	<49.8	57.4
VFS59	5	12/3/2019	0.9	<120	<0.00201	<0.00201	<50.0	<50.0	<50.0	<50.0	<50.0	119.0
VFS60	2	11/20/2019	1.0	492	<0.00199	<0.00199	<49.9	<49.9	<49.9	<49.9	<49.9	765.0
VFS60A	4	12/3/2019	0.1	436	<0.00198	<0.00198	<50.2	<50.2	<50.2	<50.2	<50.2	50.3
VFS61	8 - 10	11/20/2019	0.9	<120	<0.00201	<0.00201	<50.0	70.8	<50.0	70.8	70.8	25.2



TABLE 2
EXCAVATION CONFIRMATION SOIL ANALYTICAL RESULTS

PCA 53
REMEDATION PERMIT NUMBER 2RP-5169
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.

Sample Name	Sample Depth (feet bgs)	Sample Date	PID Screening (ppm)	Chloride Screening (ppm)	Benzene (mg/kg)	Total BTEX (mg/kg)	GRO (mg/kg)	DRO (mg/kg)	ORO (mg/kg)	Total GRO+DRO (mg/kg)	TPH (mg/kg)	Chloride (mg/kg)
VFS62	8	11/20/2019	6.0	196	<0.00200	<0.00200	<49.9	107.0	<49.9	107.0	107.0	209.0
VFS62A	15 - 18	1/9/2020	0.6	<120	<0.00200	<0.00200	<49.9	<49.9	<49.9	<49.9	<49.9	233.0
VFS63	8	11/20/2019	1.8	<120	<0.00199	<0.00199	<49.8	<49.8	<49.8	<49.8	<49.8	45.3
VFS64	8	11/20/2019	2.3	<120	<0.00201	<0.00201	<49.8	50.8	<49.8	50.8	50.8	28.1
VFS65	8	11/20/2019	1.5	<120	<0.00202	<0.00202	<50.0	<50.0	<50.0	<50.0	<50.0	147.0
VFS66	7	11/20/2019	2.5	<120	<0.00200	<0.00200	<49.9	<49.9	<49.9	<49.9	<49.9	35.1
VFS67	7	11/20/2019	1.4	<120	<0.00201	<0.00201	<49.9	<49.9	<49.9	<49.9	<49.9	58.7
VFS68	9 - 10	11/21/2019	1.5	1,080	<0.00200	<0.00200	<50.0	<50.0	<50.0	<50.0	<50.0	113.0
VFS69	20	2/3/2020	12.4	14,694	<0.0167	<0.0167	<50.2	325.0	<50.2	325.0	325.0	10,700 (b)
VFS70	20	2/3/2020	86.6	4,580	<0.0143	0.110	<50.1	565.0	<50.1	565.0	565.0	4,370.0
VFS71	8	11/20/2019	1.2	235	<0.00198	<0.00198	<49.9	96.0	<49.9	96.0	96.0	294.0
VFS72	8	11/20/2019	0.5	<120	<0.00200	<0.00200	<50.0	147.0	<50.0	147.0	147.0	114.0
VFS72A	10	12/3/2019	0.4	<120	<0.00200	<0.00200	<50.1	<50.1	<50.1	<50.1	<50.1	<50.1
VFS73	7 - 11	11/21/2019	3.4	492	<0.00199	<0.00199	<50.0	86.2	<50.0	86.2	86.2	835.0
VFS73A	20	1/9/2020	5.3	436	<0.00200	<0.00200	<49.9	<49.9	<49.9	<49.9	<49.9	675.0
VFS73B	20	2/4/2020	0.7	1,601	<0.00200	<0.00200	<50.2	<50.2	<50.2	<50.2	<50.2	1,490.0
VFS74	15 - 17	1/9/2020	0.8	330	<0.00201	<0.00201	<50.0	56.1	<50.0	56.1	56.1	381.0
VFS75	20	2/3/2020	155.0	574	<0.00200	0.0117	<50.3	109.0	<50.3	109.0	109.0	450.0
VFS76	20	2/3/2020	18.0	929	<0.00199	<0.00199	<50.3	<50.3	<50.3	<50.3	<50.3	1,130.0
VFS77	10	11/25/2019	6.7	492	<0.00200	<0.00200	<50.3	<50.3	<50.3	<50.3	<50.3	492.0
VFS78	10	11/25/2019	3.3	492	<0.00202	<0.00202	<49.9	<49.9	<49.9	<49.9	<49.9	542.0
VFS79	6 - 10	11/25/2019	5.5	560	<0.00200	<0.00200	<50.0	<50.0	<50.0	<50.0	<50.0	540.0
VFS80	8	11/25/2019	3.2	<120	<0.00201	<0.00201	<50.1	<50.1	<50.1	<50.1	<50.1	149.0
VFS81	20	2/3/2020	19.7	3,556	<0.00199	0.0196	<49.8	158.0	<49.8	158.0	158.0	551.0
VFS82	20	2/3/2020	29.7	711	<0.00198	0.0489	<50.0	142.0	<50.0	142.0	142.0	2,410.0
VFS83	7	11/26/2019	6.2	<120	<0.00198	<0.00198	<50.2	<50.2	<50.2	<50.2	<50.2	30.7
VFS84	7	11/26/2019	1.8	492	<0.00197	<0.00197	<50.2	<50.2	<50.2	<50.2	<50.2	585.0
VFS85	7 - 9	11/26/2019	6.8	235	<0.00201	<0.00201	<50.0	<50.0	<50.0	<50.0	<50.0	388.0
VFS86	10 - 15'	2/4/2020	1.2	10,348	<0.00200	<0.00200	<50.1	<50.1	<50.1	<50.1	<50.1	10,200 (b)
VFS87	20	2/3/2020	61.7	3,253	<0.00198	0.143	<50.2	456.0	<50.2	456.0	456.0	3,990.0
VFS88	20	2/3/2020	20.8	1,601	<0.00200	0.0472	<49.8	362.0	<49.8	362.0	362.0	1,290.0
VFS89	12 - 15	2/6/2020	0.2	778	<0.00200	<0.00200	<49.8	50.2	<49.8	50.2	50.2	261.0
VFS90	10	12/3/2019	2.6	<120	<0.00200	<0.00200	<50.0	<50.0	<50.0	<50.0	<50.0	82.7
VFS91	10 - 12	12/3/2019	1.9	280	<0.00199	<0.00199	<50.0	<50.0	<50.0	<50.0	<50.0	295.0
VFS92	8 - 18'	2/4/2020	3.1	4,216	<0.00198	<0.00198	<50.0	362.0	<50.0	362.0	362.0	4,800.0
VFS93	8	12/5/2019	2.0	436	<0.00198	<0.00198	<50.2	<50.2	<50.2	<50.2	<50.2	535.0
VFS94	10 - 12	2/6/2020	2.0	436	<0.00198	<0.00198	<50.2	<50.2	<50.2	<50.2	<50.2	535.0
VFS95	10 - 12	2/6/2020	12.1	2,441	<0.00199	<0.00199	<49.9	204.0	<49.9	204.0	204.0	7,450.0
VFS96	12	2/6/2020	38.8	487	<0.00199	0.149	54.9	1,280.0	93.2	1,330.0	1,430.0	3,250.0
VFS96A	12	6/10/2020	7.5	3,449	<0.00202	<0.00202	<49.8	239	50.4	239	289	5,650.0



TABLE 2
EXCAVATION CONFIRMATION SOIL ANALYTICAL RESULTS

PCA 53
REMEDATION PERMIT NUMBER 2RP-5169
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.

Sample Name	Sample Depth (feet bgs)	Sample Date	PID Screening (ppm)	Chloride Screening (ppm)	Benzene (mg/kg)	Total BTEX (mg/kg)	GRO (mg/kg)	DRO (mg/kg)	ORO (mg/kg)	Total GRO+DRO (mg/kg)	TPH (mg/kg)	Chloride (mg/kg)
VFS97	12	2/6/2020	1.3	2,128	<0.00200	<0.00200	<50.0	177.0	<50.0	177.0	177.0	6,750.0
VFS98	10	2/6/2020	6.8	436	<0.00202	0.0117	<50.3	161.0	<50.3	161.0	161.0	5,240.0
VFS99	10	2/6/2020	5.9	1,982	<0.00199	<0.00199	<50.1	<50.1	<50.1	<50.1	<50.1	2,150.0
VFS100	10	2/6/2020	1.9	10,348	<0.00202	<0.00202	<50.2	184.0	<50.2	184.0	184.0	5,690.0
VFS101	10 - 15	2/6/2020	2.5	2,620	<0.00202	<0.00202	<49.8	108.0	<49.8	108.0	108.0	4,000.0
VFS102	10	2/6/2020	0.8	2,279	<0.00200	<0.00200	<50.0	<50.0	<50.0	<50.0	<50.0	2,270.0
VFS103	10	2/6/2020	0.9	8,075	<0.00200	<0.00200	<50.2	86.3	<50.2	86.3	86.3	6,060.0
VFS104	7 - 8	2/6/2020	0.3	463	<0.00201	<0.00201	<50.2	<50.2	<50.2	<50.2	<50.2	583.0
VFS105	7 - 8	2/6/2020	0.1	<120	<0.00200	<0.00200	<50.0	<50.0	<50.0	<50.0	<50.0	538.0
VFS106	8	2/6/2020	0.2	711	<0.00199	<0.00199	<50.2	50.4	<50.2	50.4	50.4	8,540.0
VFS107	7	2/6/2020	1.1	<120	<0.00201	<0.00201	<50.2	<50.2	<50.2	<50.2	<50.2	625.0
VFS108	7	2/6/2020	9.2	1,008	<0.00200	0.00681	<50.2	214.0	<50.2	214.0	214.0	8,610.0
VFS109	7	2/6/2020	0.6	7,442	<0.00199	<0.00199	<50.1	<50.1	<50.1	<50.1	<50.1	2,750.0
VFS110	8	2/6/2020	0.4	6,865	<0.00200	<0.00200	<50.0	<50.0	<50.0	<50.0	<50.0	3,940.0
VFS111	7	2/6/2020	0.5	1,383	<0.00199	<0.00199	<50.3	<50.3	<50.3	<50.3	<50.3	1,170.0
VFS112	8	2/6/2020	10.1	851	<0.00200	<0.00200	<50.3	<50.3	<50.3	<50.3	<50.3	463.0
VFS113	8	2/6/2020	112.0	851	0.0086	0.946	150	1,400.0	98.7	1,550.0	1,650.0	641.0
VFS113A	10 - 13	4/7/2020	49.5	436	<0.00200	<0.00200	<50.1	<50.1	<50.1	<50.1	<50.1	754
VFS114	8	2/6/2020	0.2	11,257	<0.00200	<0.00200	<49.8	<49.8	<49.8	<49.8	<49.8	9,890.0
VFS115	8	2/6/2020	115.6	5,846	<0.00200	<0.00200	<50.2	<50.2	<50.2	<50.2	<50.2	4,500.0
VFS116	8	2/6/2020	0.3	5,392	<0.00201	<0.00201	<50.1	<50.1	<50.1	<50.1	<50.1	5,870.0
VFS117	6	2/18/2020	1.8	9,906	<0.00199	<0.00199	<50.3	52.2	<50.3	52.2	52.2	8,060.0
VFS118	6	2/18/2020	0.2	<1,184	<0.00200	<0.00200	<50.3	<50.3	<50.3	<50.3	<50.3	1,360.0
VFS119	8	2/18/2020	0.4	3,505	<0.00200	<0.00200	<50.2	<50.2	<50.2	<50.2	<50.2	5,050.0
VFS120	8	2/18/2020	224.5	5,364	<0.00201	0.209	<50.1	1,140.0	91.0	1,140.0	1,230.0	6,000.0
VFS120A	8	9/15/2020	0.2	229	<0.00201	<0.00201	<49.8	<49.8	<49.8	<49.8	<49.8	147.0
VFS121	8	2/18/2020	1	6,787	<0.00200	<0.00200	<50.1	<50.1	<50.1	<50.1	<50.1	6,500.0
VFS122	8	2/18/2020	0.5	<1,184	<0.00199	<0.00199	<50.2	<50.2	<50.2	<50.2	<50.2	<50.2
VFS123	8	2/18/2020	0.8	7,324	<0.00200	<0.00200	<50.2	<50.2	<50.2	<50.2	<50.2	9,650.0
VFS124	8	2/18/2020	0.5	<1,184	<0.00199	<0.00199	<50.2	<50.2	<50.2	<50.2	<50.2	1,110.0
VFS125	8	2/18/2020	0.4	<1,184	<0.00200	<0.00200	<50.1	<50.1	<50.1	<50.1	<50.1	101.0
VFS126	8	2/18/2020	0.4	<1,184	<0.00199	<0.00199	<50.3	<50.3	<50.3	<50.3	<50.3	2,300.0
VFS127	6	2/18/2020	0.4	<1,184	<0.00200	<0.00200	<50.1	<50.1	<50.1	<50.1	<50.1	333.0
VFS128	6	2/18/2020	0.2	<1,184	<0.00199	<0.00199	<50.0	<50.0	<50.0	<50.0	<50.0	173.0
VFS129	5	2/18/2020	0.2	<1,184	<0.00199	<0.00199	<50.0	<50.0	<50.0	<50.0	<50.0	265.0
VFS130	5	2/18/2020	0.2	<1,184	<0.00200	<0.00200	<50.1	<50.1	<50.1	<50.1	<50.1	195.0
VFS131	12 - 16	4/9/2020	9.4	207	<0.00199	<0.00199	<49.9	<49.9	<49.9	<49.9	<49.9	223
VFS132	10 - 14	4/9/2020	22.9	5,958	<0.00201	<0.00201	<49.8	<49.8	<49.8	<49.8	<49.8	6,530.0
VFS133	10 - 12	4/9/2020	72.1	1,568	<0.00199	<0.00199	<49.8	<49.8	<49.8	<49.8	<49.8	4,510.0



TABLE 2
EXCAVATION CONFIRMATION SOIL ANALYTICAL RESULTS

PCA 53
REMEDATION PERMIT NUMBER 2RP-5169
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.

Sample Name	Sample Depth (feet bgs)	Sample Date	PID Screening (ppm)	Chloride Screening (ppm)	Benzene (mg/kg)	Total BTEX (mg/kg)	GRO (mg/kg)	DRO (mg/kg)	ORO (mg/kg)	Total GRO+DRO (mg/kg)	TPH (mg/kg)	Chloride (mg/kg)
VFS134	10 - 12	4/9/2020	71.9	5,040	<0.0161	<0.0161	<49.9	161	<49.9	161	161	7,920.0
VFS135	11	4/9/2020	64.5	7,588	<0.0200	<0.0200	<50.2	<50.2	<50.2	<50.2	<50.2	8,240.0
VFS136	8 - 10	4/9/2020	3.9	3,516	<0.00200	<0.00200	<50.3	<50.3	<50.3	<50.3	<50.3	7,190.0
VFS137	18 - 20	4/17/2020	144.9	2,111	<0.00202	<0.00202	<49.8	495	<49.8	495	495	2,530.0
VFS138	12 - 16	4/17/2020	155.6	5,488	<0.00201	0.0528	<49.9	241	<49.9	241	241	5,070.0
VFS139	12	4/17/2020	13.0	2,111	<0.00202	<0.00202	<50.2	63.5	<50.2	63.5	63.5	3,630.0
VFS140	12	4/17/2020	46.4	9,620	<0.00202	<0.00202	<50.1	64.5	<50.1	64.5	64.5	9,290.0
VFS141	10	4/17/2020	1.5	9,620	<0.00199	<0.00199	<50.1	<50.1	<50.1	<50.1	<50.1	9,710.0
VFS142	16 - 20	4/21/2020	55.4	4,620	<0.00198	<0.00198	<50.0	<50.0	<50.0	<50.0	<50.0	6,400.0
VFS143	10 - 12	4/21/2020	26.0	5,488	<0.00200	<0.00200	<50.3	77.2	<50.3	77.2	77.2	5,390.0
VFS144	12	4/21/2020	30.2	3,516	<0.00201	<0.00201	<50.2	<50.2	<50.2	<50.2	<50.2	6,010.0
VFS145	9 - 10	4/21/2020	87.2	7,005	<0.00201	<0.00201	<50.1	319	<50.1	319	319	8,460.0
VFS146	8 - 9	4/21/2020	10.5	8,215	<0.00201	<0.00201	<50.3	165	<50.3	165	165	8,440.0
VFS147	18 - 20	5/6/2020	88	10416	<0.00201	<0.00201	<50.3	448	<50.3	448	448	15200 (b)
VFS148	12 - 14	4/29/2020	25.6	7845	<0.00202	<0.00202	<50.2	<50.2	<50.2	<50.2	<50.2	10300 (b)
VFS149	10 - 14	4/21/2020	79.4	7,588	<0.00202	<0.00202	<49.9	296	<49.9	296	296	8,880.0
VFS150	14 - 18	5/4/2020	13.6	7845	<0.00202	<0.00202	<50.1	153	<50.1	153	153	11400 (b)
VFS151	13 - 15	5/4/2020	13.3	3729	<0.00202	<0.00202	<50.1	<50.1	<50.1	<50.1	<50.1	5,580.0
VFS152	14	5/5/2020	86.4	7845	<0.00200	0.0711	<50.0	<50.0	<50.0	<50.0	<50.0	8,880.0
VFS153	12 - 14	5/5/2020	4.6	3729	<0.00200	<0.00200	<50.0	<50.0	<50.0	<50.0	<50.0	5,130.0
VFS154	8 - 10	5/6/2020	1.8	5040	<0.00200	<0.00200	<50.0	<50.0	<50.0	<50.0	<50.0	7,910.0
VFS155	8	5/6/2020	0.3	7588	<0.00201	<0.00201	<50.2	109	<50.2	109	109	12,500 (b)
VFS155A	8	6/10/2020	2.9	<3449	<0.00200	<0.00200	<50.2	65.5	<50.2	65.5	65.5	5,060.0
VFS156	8	6/10/2020	1.9	<3449	<0.00202	<0.00202	<50.2	76.4	<50.2	76.4	76.4	9,920.0
CONFIRMATION SIDEWALL SAMPLES												
VSW01	0 - 4	2/6/2020	0.8	<120	<0.00100	<0.00100	<49.9	<49.9	<49.9	<49.9	<49.9	90.9
VSW02	0 - 4	11/15/2019	0.7	196	<0.000994	<0.000994	<50.2	<50.2	<50.2	<50.2	<50.2	124.0
VSW03	0 - 8	11/15/2019	0.6	<120	<0.000994	<0.000994	<49.9	<49.9	<49.9	<49.9	<49.9	147.0
VSW04	0 - 8	11/15/2019	1.2	<120	<0.000990	<0.000990	<49.8	<49.8	<49.8	<49.8	<49.8	91.5
VSW05	0 - 8	11/15/2019	1.1	<120	<0.00100	<0.00100	<49.8	<49.8	<49.8	<49.8	<49.8	59.6
VSW06	0 - 6	11/15/2019	0.8	<120	<0.00101	<0.00101	<50.1	<50.1	<50.1	<50.1	<50.1	92.4
VSW07	0 - 15	11/25/2019	2.6	<120	<0.00202	<0.00202	<50.1	117.0	<50.1	117.0	117.0	128.0
VSW07A	0 - 12	1/8/2020	1	<120	<0.00200	<0.00200	<49.9	<49.9	<49.9	<49.9	<49.9	39.4
VSW08	0 - 4	11/25/2019	1.4	<120	<0.00198	<0.00198	<50.2	<50.2	<50.2	<50.2	<50.2	217.0
VSW09	0 - 7	11/25/2019	1.2	<120	<0.00200	<0.00200	<50.3	<50.3	<50.3	<50.3	<50.3	181.0
VSW10	0 - 7	11/25/2019	3.5	120	<0.00200	<0.00201	<50.2	<50.2	<50.2	<50.2	<50.2	280.0
VSW11	0 - 5	11/25/2019	1.8	120	<0.00200	<0.00200	<50.3	<50.3	<50.3	<50.3	<50.3	315.0
VSW12	0 - 5	11/25/2019	1	<120	<0.00201	<0.00201	<50.0	<50.0	<50.0	<50.0	<50.0	125.0
VSW13	0 - 15	11/25/2019	1.6	380	<0.00200	<0.00200	<50.0	<50.0	<50.0	<50.0	<50.0	375.0



TABLE 2
EXCAVATION CONFIRMATION SOIL ANALYTICAL RESULTS

PCA 53
REMEDATION PERMIT NUMBER 2RP-5169
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.

Sample Name	Sample Depth (feet bgs)	Sample Date	PID Screening (ppm)	Chloride Screening (ppm)	Benzene (mg/kg)	Total BTEX (mg/kg)	GRO (mg/kg)	DRO (mg/kg)	ORO (mg/kg)	Total GRO+DRO (mg/kg)	TPH (mg/kg)	Chloride (mg/kg)
VSW14	0 - 15	11/25/2019	1.7	235	<0.00202	<0.00202	<50.3	<50.3	<50.3	<50.3	<50.3	240.0
VSW15	0 - 4	11/25/2019	2	<120	<0.00199	<0.00199	<50.2	<50.2	<50.2	<50.2	<50.2	43.6
VSW16	0 - 6	11/25/2019	1.2	<120	<0.00198	<0.00198	<49.9	<49.9	<49.9	<49.9	<49.9	59.9
VSW17	0 - 10	11/25/2019	3.5	235	<0.00202	<0.00202	<50.3	<50.3	<50.3	<50.3	<50.3	383.0
VSW18	0 - 6	11/25/2019	1.2	<120	<0.00202	<0.00202	<50.2	<50.2	<50.2	<50.2	<50.2	56.7
VSW19	0 - 8	11/26/2019	1.4	380	<0.00198	<0.00198	<50.2	<50.2	<50.2	<50.2	<50.2	326.0
VSW20	0 - 4	2/3/2020	2.6	<120	<0.00200	<0.00200	<50.1	<50.1	<50.1	<50.1	<50.1	50.5
VSW21	0 - 20	2/3/2020	3.1	274	<0.00200	<0.00200	<50.0	77.5	<50.0	77.5	77.5	177.0
VSW22	0 - 8	12/5/2019	2	436	<0.00200	<0.00200	<50.1	<50.1	<50.1	<50.1	<50.1	128.0
VSW23	0 - 4	12/5/2019	0.5	<120	<0.00200	<0.00200	<50.2	<50.2	<50.2	<50.2	<50.2	75.4
VSW25	0 - 6	12/5/2019	0.5	280	<0.00198	<0.00198	<50.0	<50.0	<50.0	<50.0	<50.0	346.0
VSW26	0 - 8	12/5/2019	0.5	120	<0.00197	<0.00197	<49.8	<49.8	<49.8	<49.8	<49.8	114.0
VSW27	0 - 15	12/5/2019	3	120	<0.00198	<0.00198	<50.2	<50.2	<50.2	<50.2	<50.2	295.0
VSW28	0 - 5	12/5/2019	1	<120	<0.00197	<0.00197	<50.3	<50.3	<50.3	<50.3	<50.3	26.9
VSW29	0 - 4	12/5/2019	1.5	<120	<0.00199	<0.00199	<50.2	<50.2	<50.2	<50.2	<50.2	128.0
VSW30	0 - 5	12/5/2019	1.7	<120	<0.00199	<0.00199	<50.2	<50.2	<50.2	<50.2	<50.2	109.0
VSW31	0 - 4	12/5/2019	3.1	<120	<0.00198	<0.00198	<50.1	<50.1	<50.1	<50.1	<50.1	61.2
VSW32	0 - 8	12/5/2019	2.3	<120	<0.00198	<0.00198	<50.3	<50.3	<50.3	<50.3	<50.3	109.0
VSW33	0 - 4	2/13/2020	0.2	280	<0.00200	<0.00200	<49.8	<49.8	<49.8	<49.8	<49.8	224.0
VSW34	0 - 4	2/13/2020	0.4	<120	<0.00201	<0.00201	<50.2	<50.2	<50.2	<50.2	<50.2	24.9
VSW35	0 - 4	2/13/2020	0.3	<120	<0.00199	<0.00199	<50.3	<50.3	<50.3	<50.3	<50.3	127.0
VSW36	0 - 4	2/13/2020	0.3	330	<0.00201	<0.00201	<50.0	<50.0	<50.0	<50.0	<50.0	505.0
VSW37	0 - 4	2/13/2020	0.1	<120	<0.00199	<0.00199	<50.1	<50.1	<50.1	<50.1	<50.1	45.4
VSW38	4 - 17	2/13/2020	0.2	1,184	<0.00200	<0.00200	<50.1	<50.1	<50.1	<50.1	<50.1	511.0
VSW39	4 - 17	2/13/2020	3	1,184	<0.00201	<0.00201	<50.2	<50.2	<50.2	<50.2	<50.2	114.0
VSW40	4 - 10	2/13/2020	6.9	184	<0.00202	<0.00202	<50.2	162.0	<50.2	162.0	162.0	967.0
VSW41	4 - 12	2/13/2020	3	3,830	<0.00199	<0.00199	<50.0	72.4	<50.0	72.4	72.4	5,910.0
VSW42	4 - 10	2/13/2020	2.5	6,787	<0.00198	<0.00198	<50.3	<50.3	<50.3	<50.3	<50.3	7,040.0
VSW43	4 - 9	2/13/2020	1.2	3,830	<0.00200	<0.00200	<50.1	<50.1	<50.1	<50.1	<50.1	5,720.0
VSW44	0 - 4	2/13/2020	0.1	<120	<0.00201	<0.00201	<50.3	<50.3	<50.3	<50.3	<50.3	119.0
VSW45	0 - 4	2/13/2020	0.1	<120	<0.00201	<0.00201	<50.1	<50.1	<50.1	<50.1	<50.1	79.3
VSW46	0 - 4	2/13/2020	0.2	330	<0.00202	<0.00202	<50.1	<50.1	<50.1	<50.1	<50.1	527.0
VSW47	0 - 4	2/13/2020	0.2	<120	<0.00201	<0.00201	<50.0	<50.0	<50.0	<50.0	<50.0	26.0
VSW48	0 - 4	2/13/2020	0.2	<120	<0.00201	<0.00201	<50.2	<50.2	<50.2	<50.2	<50.2	71.7
VSW49	4 - 20	2/14/2020	2.5	2,357	<0.00200	<0.00200	<50.1	90.7	<50.1	90.7	90.7	4,160.0
VSW50	4 - 20	2/14/2020	1.8	13,192	<0.00200	<0.00200	<50.0	84.7	<50.0	84.7	84.7	3,780.0
VSW51	4 - 20	2/14/2020	35.6	<1,184	<0.00200	0.00354	<50.1	256.0	<50.1	256.0	256.0	835.0
VSW52	4 - 20	2/14/2020	7.6	2,357	<0.00200	<0.00200	<49.9	217.0	<49.9	217.0	217.0	3,640.0
VSW53	4 - 20	2/14/2020	5.1	2,895	<0.00201	<0.00201	<49.9	105.0	<49.9	105.0	105.0	3,930.0
VSW54	4 - 10	2/14/2020	10.2	1,876	<0.00199	<0.00199	<50.1	75.3	<50.1	75.3	75.3	2,680.0



TABLE 2
EXCAVATION CONFIRMATION SOIL ANALYTICAL RESULTS

PCA 53
REMEDATION PERMIT NUMBER 2RP-5169
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.

Sample Name	Sample Depth (feet bgs)	Sample Date	PID Screening (ppm)	Chloride Screening (ppm)	Benzene (mg/kg)	Total BTEX (mg/kg)	GRO (mg/kg)	DRO (mg/kg)	ORO (mg/kg)	Total GRO+DRO (mg/kg)	TPH (mg/kg)	Chloride (mg/kg)
VSW55	4 - 15	2/14/2020	29.2	1,876	<0.00200	0.00378	<50.3	923.0	86.4	923.0	1,010.0	7,150.0
VSW56	4 - 8	2/14/2020	2.2	1,184	<0.00199	<0.00199	<50.0	<50.0	<50.0	<50.0	<50.0	227.0
VSW57	4 - 9	2/14/2020	76.2	1,184	<0.00200	0.00491	<49.9	641.0	61.1	641.0	702.0	243.0
VSW58	4 - 9	2/14/2020	0.7	1,876	<0.00200	<0.00200	<49.8	<49.8	<49.8	<49.8	<49.8	4,470.0
VSW59	0 - 4	2/14/2020	1.3	<120	<0.00200	<0.00200	<50.2	64.4	<50.2	64.4	64.4	31.3
VSW60	0 - 4	2/14/2020	0.4	<120	<0.00200	<0.00200	<50.2	<50.2	<50.2	<50.2	<50.2	113.0
VSW61	0 - 4	2/14/2020	0.4	<120	<0.00202	<0.00202	<50.1	<50.1	<50.1	<50.1	<50.1	82.2
VSW62	0 - 4	2/14/2020	0.4	<120	<0.00202	<0.00202	<50.3	<50.3	<50.3	<50.3	<50.3	20.3
VSW63	0 - 4	2/14/2020	0.5	<120	<0.00200	<0.00200	<50.2	<50.2	<50.2	<50.2	<50.2	26.8
VSW64	0 - 4	2/14/2020	0.4	235	<0.00201	<0.00201	<50.1	<50.1	<50.1	<50.1	<50.1	306.0
VSW65	0 - 4	2/14/2020	0.3	280	<0.00202	<0.00202	<50.0	<50.0	<50.0	<50.0	<50.0	407.0
VSW66	0 - 4	2/14/2020	0.3	436	<0.00202	<0.00202	<50.1	<50.1	<50.1	<50.1	<50.1	506.0
VSW67	4 - 8	2/18/2020	30.8	8,517	<0.00201	<0.00201	<50.2	536.0	<50.2	536.0	536.0	11,400 (b)
VSW67A	4 - 8	5/5/2020	12.9	3,729	<0.00200	<0.00200	<49.9	<49.9	<49.9	<49.9	<49.9	3,640.0
VSW68	4-8	2/19/2020	0.8	1,601	<0.00201	<0.00201	<50.1	<50.1	<50.1	<50.1	<50.1	1,510.0
VSW69	4-8	2/18/2020	0.4	<1,184	<0.00199	<0.00199	<49.9	<49.9	<49.9	<49.9	<49.9	43.4
VSW70	4-6	2/19/2020	0.4	<174	<0.00202	<0.00202	<50.2	<50.2	<50.2	<50.2	<50.2	24.8
VSW71	4-8	2/19/2020	0.3	538	<0.00199	<0.00199	<49.9	<49.9	<49.9	<49.9	<49.9	526.0
VSW72	4-8	2/19/2020	0.2	1,187	<0.00202	<0.00202	<50.1	<50.1	<50.1	<50.1	<50.1	1,080.0
VSW73	4 - 8	2/18/2020	11.2	<1,184	<0.00199	<0.00199	<50.1	299.0	<50.1	299.0	299.0	1,980.0
VSW74	0 - 4	2/19/2020	0.2	207	<0.00200	<0.00200	<50.1	<50.1	<50.1	<50.1	<50.1	179.0
VSW75	4 - 8	2/18/2020	0.7	2,111	<0.00202	<0.00202	<50.1	<50.1	<50.1	<50.1	<50.1	3,640.0
VSW76	0 - 4	2/18/2020	0.9	380	<0.00199	<0.00199	<50.0	<50.0	<50.0	<50.0	<50.0	474 X
VSW77	4 - 8	2/18/2020	0.5	3,192	<0.00200	<0.00200	<49.8	<49.8	<49.8	<49.8	<49.8	2,840.0
VSW78	0 - 4	2/19/2020	0.2	274	<0.00202	<0.00202	<49.8	<49.8	<49.8	<49.8	<49.8	221.0
VSW79	4 - 15	2/19/2020	0.6	1,490	<0.00201	<0.00201	<50.2	<50.2	<50.2	<50.2	<50.2	1,630.0
VSW80	0 - 4	2/18/2020	0.5	<120	<0.00200	<0.00200	<50.0	<50.0	<50.0	<50.0	<50.0	95.4
VSW81	0 - 4	2/19/2020	6.4	1,383	<0.00201	<0.00201	<49.9	129.0	<49.9	129.0	129.0	885 (a)
VSW81A	0 - 4	4/7/2020	0.8	<120	<0.00200	<0.00200	<50.0	<50.0	<50.0	<50.0	<50.0	109
VSW82	0 - 4	2/18/2020	0.8	<120	<0.00201	<0.00201	<50.2	<50.2	<50.2	<50.2	<50.2	36.5
VSW83	4 - 8	2/19/2020	0.5	5,392	<0.00200	<0.00200	<50.0	<50.0	<50.0	<50.0	<50.0	4,410.0
VSW84	4 - 10	2/18/2020	0.8	<1,184	<0.00202	<0.00202	<50.3	<50.3	<50.3	<50.3	<50.3	1,950.0
VSW85	4 - 8	2/18/2020	0.4	<1,184	<0.00202	<0.00202	<50.1	<50.1	<50.1	<50.1	<50.1	173.0
VSW86	0 - 4	2/19/2020	0.2	1,982	<0.00200	<0.00200	<50.1	<50.1	<50.1	<50.1	<50.1	451.0
VSW87	4 - 8	2/18/2020	0.9	5,807	<0.00201	<0.00201	<50.3	52.8	<50.3	52.8	52.8	11,800 (b)
VSW87A	4 - 8	4/7/2020	1.0	<120	<0.00200	<0.00200	<50.2	<50.2	<50.2	<50.2	<50.2	43.8
VSW88	0 - 4	2/19/2020	0.3	778	<0.00200	<0.00200	<49.8	<49.8	<49.8	<49.8	<49.8	1,130 (a)
VSW88A	0 - 4	4/7/2020	0.3	308	<0.00198	<0.00198	<50.3	<50.3	<50.3	<50.3	<50.3	151
VSW89	4 - 8	2/19/2020	1.7	16,128	<0.00200	<0.00200	<49.9	119.0	<49.9	119.0	119.0	13,200 (b)
VSW89A	4 - 8	4/7/2020	0.2	1,601	<0.00202	<0.00202	<50.1	<50.1	<50.1	<50.1	<50.1	2,080.0



TABLE 2
EXCAVATION CONFIRMATION SOIL ANALYTICAL RESULTS

PCA 53
REMEDIATION PERMIT NUMBER 2RP-5169
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.

Sample Name	Sample Depth (feet bgs)	Sample Date	PID Screening (ppm)	Chloride Screening (ppm)	Benzene (mg/kg)	Total BTEX (mg/kg)	GRO (mg/kg)	DRO (mg/kg)	ORO (mg/kg)	Total GRO+DRO (mg/kg)	TPH (mg/kg)	Chloride (mg/kg)
VSW90	0 - 4	2/19/2020	0.7	<174	<0.00200	<0.00200	<49.8	<49.8	<49.8	<49.8	<49.8	210.0
VSW91	4 - 8	2/19/2020	0.4	2,279	<0.00200	<0.00200	<50.0	<50.0	<50.0	<50.0	<50.0	952.0
VSW92	8 - 20	4/17/2020	86.4	<1,184	<0.00201	<0.00201	<50.3	54.9	<50.3	54.9	54.9	88.3
VSW93	8 - 20	4/21/2020	188.5	<2,111	<0.00200	<0.00200	<49.8	<49.8	<49.8	<49.8	<49.8	458
VSW94	9 - 20	4/29/2020	1,175.0	1,182	<0.00201	<0.00201	<50.2	77.5	<50.2	77.5	77.5	5,960.0
VSW95	9 - 18	5/5/2020	109.5	5,258	<0.00200	<0.00200	<50.3	<50.3	<50.3	<50.3	<50.3	7,150.0
VSW96	8 - 14	5/5/2020	82.8	5,258	<0.00200	<0.00200	<49.8	72.6	<49.8	72.6	72.6	7,030.0
VSW97	8 - 14	5/5/2020	9.3	2,004	<0.00200	<0.00200	<50.2	<50.2	<50.2	<50.2	<50.2	3,530.0
VSW102	0 - 8	6/10/2020	193.0	<3449	<0.0105	<0.0105	<50.3	1,090.0	140.0	1,090.0	1,230.0	13,600 (a,b)
VSW102A	0 - 8	9/2/2020	7.7	21,873	<0.00201	<0.00201	<49.9	89.5	<49.9	89.5	89.5	28,100 (a,b)
VSW103	0 - 8	6/10/2020	108.3	<3449	<0.0102	<0.0102	<50.0	1,490.0	154.0	1,490.0	1,640.0	21,000 (a,b)
VSW103A	0 - 8	9/2/2020	48.5	12,751	<0.00200	<0.00200	<49.9	1,070	205.0	1,360	1,570	11,400 (a,b)
VSW103B	0 - 8	9/17/2020	24.6	6,250	<0.00199	<0.00199	<50.2	241	<50.2	241	241	5,240
NMOCD Table 1 Closure Criteria			NE	NE	10	50	NE	NE	NE	1,000	2,500	600(a)/10,000(b)

Notes:

(a) - closure criteria for soil 0 - 4 ft bgs

(b) - closure criteria for soil greater than 4 feet bgs

bgs - below ground surface

BTEX - benzene, toluene, ethylbenzene, and total xylenes

CCHE - caliche

CL - clay

DOL - dolomite

DRO - diesel range organics

GRO - gasoline range organics

GYP - gypsum

mg/kg - milligrams per kilogram

ML - silt

NMOCD - New Mexico Oil Conservation Division

NE - not established

ORO - motor oil range organics

PID - Photoionization Detector

ppm - parts per million

SC - clayey sand

SP/SM - poorly graded sand / silty sand

SW - well graded sand

TPH - total petroleum hydrocarbons

X - in quality control of data a QC deficiency was observed and flagged as noted in the laboratory report

Bold - indicates result exceeds the applicable Closure Criteria

< - indicates result is below laboratory reporting limits

Gray text indicates that sample location was excavated and/or resampled and the following sample with letter suffix indicates what is current



TABLE 4
GROUNDWATER ELEVATIONS AND THICKNESS OF PHASE-SEPARATED HYDROCARBONS

PCA 53
REMEDIATION PERMIT NUMBER 2RP-5169
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC

Well ID	Wellhead Elevation, TOC (feet AMSL)	Wellhead Elevation, Ground Surface (feet AMSL)	Sample Date	Depth to Water (feet BTOC)	Depth to Product (feet BTOC)	PSH Thickness (feet)	Adjusted GWEL (feet)
Shallow Wells							
BH14	3,015.56	3,013.05	11/25/2019	47.88	47.42	0.46	2,968.05
			01/07/2020	48.74	48.45	0.29	2,967.05
			02/19/2020	49.28	49.15	0.13	2,966.38
			08/17/2020	48.51	48.49	0.02	2,967.07
BH16	3,015.56	3,015.09	11/25/2019	48.16	---	---	2,967.40
			01/07/2020	47.54	---	---	2,968.02
			02/19/2020	47.62	---	---	2,967.94
			08/17/2020	47.28	---	---	2,968.28
BH22	3,023.59	3,020.71	11/25/2019	---	---	---	Dry
			01/07/2020	---	---	---	Dry
			02/19/2020	---	---	---	Dry
			08/17/2020	60.08	---	---	2,963.51
BH25	3,022.86	3,019.83	11/25/2019	55.00	---	---	2,967.86
			01/07/2020	55.99	---	---	2,966.87
			02/18/2020	56.55	---	---	2,966.31
			08/17/2020	56.14	---	---	2,966.72
BH26	3,015.12	3,011.93	11/25/2019	47.25	47.10	0.15	2,967.99
			01/07/2020	48.53	48.34	0.19	2,966.74
			02/19/2020	48.84	48.81	0.03	2,966.30
			08/17/2020	48.28	---	---	2,966.84
BH27	3,011.77	3,008.79	11/25/2019	44.55	43.62	0.93	2,967.96
			01/07/2020	45.36	44.89	0.47	2,966.79
			02/19/2020	45.85	45.42	0.43	2,966.26
			08/17/2020	45.27	44.82	0.45	2,966.86
BH32	3,020.98	3,018.01	11/25/2019	53.21	---	---	2,967.77
			01/07/2020	54.25	---	---	2,966.73
			02/19/2020	54.79	---	---	2,966.19
			08/17/2020	54.25	---	---	2,966.73
BH37	3,021.10	3,018.18	01/07/2020	54.30	---	---	2,966.80
			02/19/2020	55.30	54.85	0.45	2,966.16
			08/17/2020	57.32	57.11	0.21	2,963.95
BH39	3,024.53	3,021.49	01/07/2020	57.71	---	---	2,966.82
			02/18/2020	58.31	---	---	2,966.22
			08/17/2020	57.89	---	---	2,966.64
BH46	3,023.28	3,020.22	01/07/2020	58.90	---	---	2,964.38
			02/18/2020	59.50	---	---	2,963.78
			08/17/2020	59.11	---	---	2,964.17
BH48	3,020.97	3,017.77	01/28/2020	54.42	---	---	2,968.86
			02/19/2020	54.72	---	---	2,968.56
			08/17/2020	55.82	---	---	2,967.46
BH51	3,019.46	3,016.55	02/06/2020	---	54.55	0.60	2,964.91
			02/19/2020	---	54.62	0.53	2,964.84
			08/17/2020	---	55.04	0.34	2,964.42
BH53	3,027.13	3,023.97	02/06/2020	60.16	---	---	2,966.97
			02/18/2020	60.84	---	---	2,966.29
			08/17/2020	60.51	---	---	2,966.62



TABLE 4
GROUNDWATER ELEVATIONS AND THICKNESS OF PHASE-SEPARATED HYDROCARBONS

PCA 53
REMEDATION PERMIT NUMBER 2RP-5169
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC

Well ID	Wellhead Elevation, TOC (feet AMSL)	Wellhead Elevation, Ground Surface (feet AMSL)	Sample Date	Depth to Water (feet BTOC)	Depth to Product (feet BTOC)	PSH Thickness (feet)	Adjusted GWEL (feet)
Deep Wells							
MW01	3,031.74	3,028.90	10/28/2019	99.81	---	---	2,931.93
			12/27/2019	92.29	---	---	2,939.45
			02/19/2020	92.46	---	---	2,939.28
			05/18/2020	92.11	---	---	2,939.63
			08/19/2020	92.23	---	---	2,939.51
MW02	3,030.80	3,028.00	10/28/2019	89.41	---	---	2,941.39
			12/27/2019	88.48	---	---	2,942.32
			02/19/2020	88.71	---	---	2,942.09
			05/18/2020	88.16	---	---	2,942.64
			08/19/2020	88.20	---	---	2,942.60
MW03	3,020.77	3,017.87	10/28/2019	62.93	---	---	2,957.84
			12/27/2019	63.35	---	---	2,957.42
			02/19/2020	59.25	---	---	2,961.52
			05/18/2020	59.16	---	---	2,961.61
			08/19/2020	58.56	---	---	2,962.21

Notes:
BTOC - below top of casing
GWEL - groundwater elevation
PSH - phase-separated hydrocarbon
TOC - top of casing
- indicates no GWEL or PSH measured
When PSH is detected, the GWEL is corrected using an estimated density correction factor of 0.88.



**TABLE 3
ESTIMATED PRODUCT RECOVERY**

**PCA 53
REMEDATION PERMIT 2RP-5169
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.**

Date	Product Recovered (gal), Bailer	Product Recovered (gal), Socks (assumes 17 oz per sock per event)
11/25/2019 to 1/31/2020	35.0	---
2/11/20	0.35	---
2/12/20	0.60	---
2/13/20	0.60	---
2/24/20	1.57	---
2/25/20	0.95	---
2/26/20	0.85	---
3/2/20	1.30	---
3/3/20	0.85	---
3/10/20	0.55	---
3/11/20	0.13	---
3/16/20	0.04	0.66
3/17/20	0.75	0.66
3/18/20	0.00	0.66
3/23/20	0.25	0.66
3/24/20	0.10	0.66
3/27/20	0.00	0.66
3/31/20	0.00	0.66
4/1/20	0.00	0.66
4/2/20	0.00	0.66
4/7/20	0.00	0.66
4/8/20	0.00	0.66
4/9/20	0.00	0.66
4/16/20	0.00	0.66
4/20/20	0.25	0.53
4/21/20	0.10	0.53
4/22/20	0.15	0.40
4/29/20	0.10	0.40
4/30/20	0.00	0.40
5/4/20	0.00	0.40
5/5/20	0.00	0.40
5/11/20	0.30	0.00
5/12/20	0.00	0.00
5/13/20	0.00	0.30
5/18/20	0.25	0.30
5/19/20	0.25	0.30
5/20/20	0.10	0.30
5/26/20	0.10	0.30
5/27/20	0.10	0.30
6/1/20	0.00	0.40



**TABLE 3
ESTIMATED PRODUCT RECOVERY**

**PCA 53
REMEDATION PERMIT 2RP-5169
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.**

Date	Product Recovered (gal), Bailer	Product Recovered (gal), Socks (assumes 17 oz per sock per event)
6/3/20	0.00	0.20
6/8/20	0.00	0.30
6/10/20	0.00	0.30
6/11/20	0.00	0.30
6/15/20	0.00	0.30
6/17/20	0.00	0.30
6/23/20	0.00	0.30
6/29/20	0.00	0.20
7/6/20	0.25	0.00
7/15/20	0.25	0.00
7/20/20	0.25	0.00
7/27/20	0.25	0.00
8/3/20	0.25	0.00
8/11/20	0.50	0.00
8/12/20	0.30	0.00
8/13/20	0.30	0.00
8/17/20	0.30	0.00
8/18/20	0.30	0.00
8/19/20	0.30	0.00
8/20/20	0.30	0.00
8/25/20	0.30	0.00
9/1/20	0.30	0.00
Subtotal	49.74	16.04
Total Product Recovered (gallons)		65.78

Notes:

gal - gallon

oz - ounce



**TABLE 6
SHALLOW AND DEEP WATER ANALYTICAL RESULTS**

**PCA 53
REMEDIATION PERMIT NUMBER 2RP-5169
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.**

Sample Name	Sample Date	Benzene (mg/L)	Toluene (mg/L)	Ethyl-benzene (mg/L)	Total Xylenes (mg/L)	Chloride (mg/L)	TDS (mg/L)
Shallow Wells							
BH14	10/25/2019	1.15	3.64	0.104	8.20	27,000	43,900
BH14	12/27/2019	269	7,110	5,310	9,740	30,900	40,300
BH14	02/21/2020	0.542	1.34	0.0470	1.02	26,400	40,010
BH16	10/25/2019	0.799	2.03	0.0458	0.644	54,900	106,000
BH16	12/27/2019	0.478	0.550	0.0207	0.285	83,100	102,000
BH16	02/21/2020	0.929	1.34	0.0273	0.481	57,000	94,100
BH22	10/25/2019	DRY					
BH22	12/27/2019	DRY					
BH22	02/21/2020	DRY					
BH25	10/25/2019	0.0156	<0.00200	<0.00200	<0.00200	10,800	24,500
BH25	12/27/2019	<0.00200	<0.00200	<0.00200	<0.00200	12,600	21,600
BH25	02/21/2020	<0.00200	<0.00200	<0.00200	<0.00200	18,500	29,900
BH26	10/25/2019	13.5	21.8	14.6	37.4	26,500	46,800
BH26	12/27/2019	0.503	0.866	0.0392	0.525	38,800	58,600
BH26	02/21/2020	0.192	0.466	<0.100	0.558	39,100	59,800
BH27	10/25/2019	49.5	306	79.0	1,130	24,900	48,900
BH27	12/27/2019	144	1,020	299	6,810	23,000	37,600
BH27	02/21/2020	0.171	0.98	0.102	2.32	34,900	57,200
BH32	10/25/2019	0.00552	0.012	<0.00200	0.00729	27,600	52,100
BH32	12/27/2019	0.00525	0.0129	<0.00200	0.0104	27,100	40,000
BH32	02/21/2020	0.00283	0.00702	<0.00200	0.0114	25,600	41,400
BH37	12/27/2019	0.0174	0.0718	0.00900	0.0324	19,400	32,200
BH37	02/21/2020	0.253	1.25	0.10500	2.89	19,300	34,800
BH39	12/27/2019	<0.00200	<0.00200	<0.00200	<0.00200	26,400	42,100
BH39	02/21/2020	<0.00200	<0.00200	<0.00200	<0.00200	22,200	38,700
BH46	12/27/2019	<0.00200	<0.00200	<0.00200	<0.00200	25,800	41,100
BH46	02/21/2020	<0.00200	<0.00200	<0.00200	<0.00200	21,600	38,900
BH48	01/28/2020	<0.00200	<0.00200	<0.00200	<0.00200	13,900	33,000
BH48	02/21/2020	<0.00200	<0.00200	<0.00200	<0.00200	12,900	26,700
BH51	02/06/2020	Not Sampled, PSH Present in Well, Water Not Present					
BH53	02/06/2020	<0.00200	<0.00200	<0.00200	<0.00200	11,400	21,100
BH53	02/21/2020	<0.00200	<0.00200	<0.00200	<0.00200	11,500	21,600
Deep Wells							
MW01	10/28/2019	<0.00200	<0.00200	<0.00200	<0.00200	410	3,370
MW01	12/27/2019	<0.00200	<0.00200	<0.00200	<0.00200	526	3,150
MW01	02/21/2020	<0.00200	<0.00200	<0.00200	<0.00200	551	4,580
MW01	05/18/2020	<0.00200	<0.00200	<0.00200	<0.00200	NS	NS
MW01	08/19/2020	<0.00200	<0.00200	<0.00200	<0.00200	NS	NS
MW02	10/28/2019	<0.00200	<0.00200	<0.00200	<0.00200	1,110	5,950
MW02	12/27/2019	<0.00200	<0.00200	<0.00200	<0.00200	1,120	5,680
MW02	02/21/2020	<0.00200	<0.00200	<0.00200	<0.00200	1,150	5,640
MW02	05/18/2020	<0.00200	<0.00200	<0.00200	<0.00200	NS	NS
MW02	08/19/2020	<0.00200	<0.00200	<0.00200	<0.00200	NS	NS
MW03	10/28/2019	<0.00200	<0.00200	<0.00200	<0.00200	443	3,960
MW03	12/27/2019	<0.00200	<0.00200	<0.00200	<0.00200	408	3,740
MW03	02/21/2020	<0.00200	<0.00200	<0.00200	<0.00200	422	4,220
MW03	05/18/2020	<0.00200	<0.00200	<0.00200	<0.00200	NS	NS
MW03	08/19/2020	<0.00200	<0.00200	<0.00200	<0.00200	NS	NS
NMWQCC Standard		0.005	1.00	0.700	0.62	250	1,000 (a)/10,000 (b)

Notes:

mg/L - milligrams per liter

NMWQCC - New Mexico Water Quality Control Commission

TDS - total dissolved solids

Bold - indicates result exceeds the applicable regulatory standard

< - indicates result is below laboratory reporting limits

(a) - standard for domestic water supply

(b) - standard for agricultural water supply



TABLE 8
STOCK TANK WATER ANALYTICAL RESULTS

PCA 53
REMEDIATION PERMIT NUMBER 2RP-5169
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.

Sample Name	Sample Date	Benzene (mg/L)	Toluene (mg/L)	Ethyl-benzene (mg/L)	Total Xylenes (mg/L)	BTEX (mg/kg)	Chloride (mg/L)
NMWQCC Standard		0.005	1.00	0.70	0.62	NE	250
Stock Tank	12/05/2018	<0.00200	<0.00200	<0.00200	<0.00200	N/A	143
Stock Tank	03/27/2019	<0.00200	<0.00200	<0.00200	<0.00200	N/A	172
Stock Tank	06/27/2019	<0.00200	<0.00200	<0.00200	<0.00200	N/A	126
Stock Tank	09/30/2019	<0.00200	<0.00200	<0.00200	<0.00200	N/A	160
Stock Tank	12/23/2019	N/A	N/A	N/A	N/A	N/A	N/A
Stock Tank	02/12/2020	N/A	N/A	N/A	N/A	N/A	N/A
Stock Tank	03/12/2020	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	190
Stock Tank	03/24/2020	<0.00100	<0.00100	<0.00100	<0.00100	<0.00100	181
Stock Tank	06/16/2020	N/A	N/A	N/A	N/A	N/A	N/A
Stock Well	08/11/2020	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	233

Notes:

mg/L - milligrams per liter

NMWQCC - New Mexico Water Quality Control Commission

Bold - indicates result exceeds the applicable regulatory standard

< - indicates result is below laboratory reporting limits

N/A - not analyzed

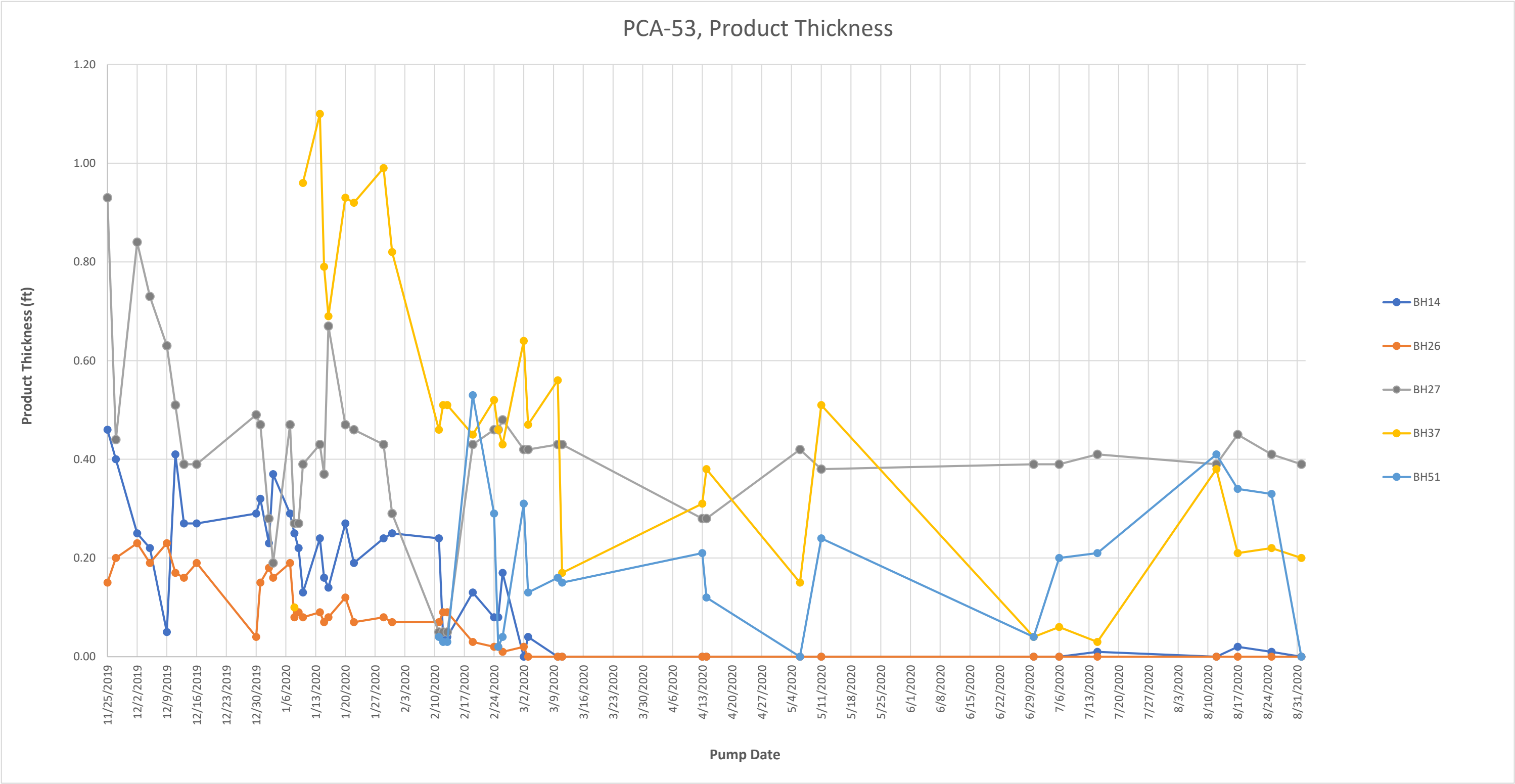
NE -not established



GRAPH



PCA-53, Product Thickness



ATTACHMENT 1: LABORATORY ANALYTICAL REPORTS

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 10472

CONDITIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 10472
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	Please review "Incident Events" on the NAB1901038306 PCA 53 Incident Details page for additional conditions.	5/26/2022