

Location:	PLU 30 Big Sinks CTB	
Spill Date:	1/14/2024	
Area 1		
Approximate Area =	61.76	cu.ft.
VOLUME OF LEAK		
Total Crude Oil =	0.00	bbls
Total Produced Water =	11.00	bbls
TOTAL VOLUME OF LEAK		
Total Crude Oil =	0.00	bbls
Total Produced Water =	11.00	bbls
TOTAL VOLUME RECOVERED		
Total Crude Oil =	0.00	bbls
Total Produced Water =	11.00	bbls



August 29, 2024

New Mexico Oil Conservation Division

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

**Re: Closure Request Addendum
PLU 30 Big Sinks Battery
Incident Number nAPP2402531902
Eddy County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of XTO Energy, Inc (XTO), has prepared this *Closure Request* to document the findings of a liner integrity inspection conducted at the PLU 30 Big Sinks Battery (Site) following a release of produced water within a lined containment. Based on the liner integrity inspection activities, XTO is submitting this *Closure Request Addendum*, describing assessment activities that have occurred and requesting no further action and closure for Incident Number nAPP2402531902.

SITE DESCRIPTION AND RELEASE SUMMARY

The Site is located in Unit F Section 30, Township 25 South, Range 31 East, in Eddy County, New Mexico (32.10418°, -103.82158°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM).

On January 14, 2024, equipment failure of a pump resulted in the release of approximately 11 barrels (bbls) of produced water into a lined containment. A vacuum truck was dispatched to the Site to recover free-standing fluids, and all released fluids were recovered. XTO reported the release to the New Mexico Oil Conservation Division (NMOCD) via a Notification of Release (NOR) on January 25, 2024. The release was assigned Incident Number nAPP2402531902.

A 48-hour liner inspection notification was submitted and on January 29, 2024 the liner was inspected. Photographic documentation of the liner inspection and supporting documents were submitted to the NMOCD on January 29, 2024. However, on April 4, 2024 NMOCD denied the *Closure Request* and requested a second liner inspection following removal of debris obstructing the view of the liner.

SITE CHARACTERIZATION AND CLOSURE CRITERIA

The Site was characterized to assess the applicability of Table 1, Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29 (19.15.29) of the New Mexico Administrative Code (NMAC). Results from the characterization desktop review are presented below and potential Site receptors are identified on Figure 1.

Depth to groundwater at the Site is greater than 100 feet below ground surface (bgs) based on the nearest groundwater well data. The closest permitted groundwater well with depth to groundwater data is a soil boring drilled for regional depth to water determination. In June 2022, New Mexico Office of the

XTO Energy, Inc
Closure Request
PLU 30 Big Sinks Battery

State Engineer (NMOSE) permitted soil boring C-4624 was drilled approximately 1,301 feet to the southeast of the Site. Soil boring C-4624 was drilled to a depth of 120 feet bgs. A field geologist logged and described soils continuously. No moisture or groundwater was encountered during drilling activities. The borehole was left open for over 72 hours to allow for potential slow infill of groundwater. After the 72-hour waiting period without observing groundwater, it was confirmed that groundwater was greater than 120 feet bgs. All wells used for depth to groundwater determination are presented on Figure 1. The Well Record and Log for soil boring C-4624 is included in Appendix A.

The closest continuously flowing or significant watercourse to the Site is a riverine, located approximately 1,003 feet west of the Site. The Site is greater than 200 feet from a lakebed, sinkhole, or playa lake and greater than 300 feet from an occupied residence, school, hospital, institution, church, or wetland. The Site is greater than 1,000 feet to a freshwater well or spring and is not within a 100-year floodplain or overlying a subsurface mine. The Site is not underlain by unstable geology (medium potential karst designation area). Site receptors are identified on Figure 1.

Based on the results of the Site Characterization, the following NMOCD Table I Closure Criteria (Closure Criteria) apply:

- Benzene: 10 milligrams per kilogram (mg/kg)
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg
- Total petroleum hydrocarbons (TPH)-gasoline range organics (GRO) and TPH-diesel range organics (DRO): 1,000 mg/kg
- TPH: 2,500 mg/kg
- Chloride: 20,000 mg/kg

LINER INTEGRITY INSPECTION ACTIVITIES

A 48-hour advance notice of the liner inspection was submitted to the NMOCD on August 13, 2024. A liner integrity inspection was conducted by Ensolum personnel on August 20, 2024. The lined containment was cleaned of all debris and power washed to remove dried mud and soil blown into the containment. Upon inspection, no rips, tears, holes, or damage were observed and the liner was determined to be operating as designed. The liner was determined to be sufficient. Photographic documentation of the inspection is included in Appendix B.

CLOSURE REQUEST

Liner integrity inspection activities were conducted following a release of produced water within a lined containment at the Site. Following removal of all fluids, a liner integrity inspection was conducted by Ensolum personnel on August 20, 2024. Upon inspection, no rips, tears, holes, or damage were observed, and the liner was determined to be sufficient. The release was contained laterally by the lined containment and the liner is performing as designed. Based on initial response efforts and the liner operating as designed, XTO respectfully requests closure for Incident Number nAPP2402531902.

If you have any questions or comments, please contact Ms. Tacoma Morrissey at (337) 257-8307 or tmorrissey@ensolum.com.



XTO Energy, Inc
Closure Request
PLU 30 Big Sinks Battery

Sincerely,
Ensolum, LLC



Tracy Hillard
Staff Engineer



Tacoma Morrissey
Associate Principal

Cc: Kaylan Dirkx, XTO
Amanda Garcia, XTO
BLM

Appendices:

Figure 1	Site Receptor Map
Appendix A	Referenced Well Records
Appendix B	Photographic Log



FIGURES



APPENDIX A

Referenced Well Records



WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

www.ose.state.nm.us

1. GENERAL AND WELL LOCATION	OSE POD NO. (WELL NO.) C-4624 POD 1		WELL TAG ID NO.		OSE FILE NO(S). C-4624			
	WELL OWNER NAME(S) XTO ENERGY INC				PHONE (OPTIONAL) 432-236-3808			
	WELL OWNER MAILING ADDRESS 6401 HOLIDAY HILL ROAD				CITY MIDLAND			
					STATE TX			
					ZIP 79707			
WELL LOCATION (FROM GPS)	DEGREES LATITUDE 32		MINUTES 6		SECONDS 5.66		* ACCURACY REQUIRED: ONE TENTH OF A SECOND * DATUM REQUIRED: WGS 84	
	LONGITUDE -103		49		5.79			
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS - PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE ON POKER LAKE UNIT 30 BS # 103H PAD								
2. DRILLING & CASING INFORMATION	LICENSE NO. WD-1184		NAME OF LICENSED DRILLER RUSSELL SOUTHERLAND			NAME OF WELL DRILLING COMPANY WEST TEXAS WATER WELL SERVICE		
	DRILLING STARTED 06/22/22		DRILLING ENDED 06/22/22		DEPTH OF COMPLETED WELL (FT) 120		BORE HOLE DEPTH (FT)	
	COMPLETED WELL IS:		<input type="checkbox"/> ARTESIAN <input checked="" type="checkbox"/> DRY HOLE <input type="checkbox"/> SHALLOW (UNCONFINED)				DEPTH WATER FIRST ENCOUNTERED (FT)	
	DRILLING FLUID:		<input checked="" type="checkbox"/> AIR <input type="checkbox"/> MUD ADDITIVES - SPECIFY:				STATIC WATER LEVEL IN COMPLETED WELL (FT) N/A	
	DRILLING METHOD:		<input checked="" type="checkbox"/> ROTARY <input type="checkbox"/> HAMMER <input type="checkbox"/> CABLE TOOL <input type="checkbox"/> OTHER - SPECIFY:					
	DEPTH (feet bgl)		BORE HOLE DIAM (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)	CASING CONNECTION TYPE (add coupling diameter)	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)	SLOT SIZE (inches)
	FROM	TO						
				NO CASING IN HOLE				
3. ANNULAR MATERIAL	DEPTH (feet bgl)		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL	AMOUNT (cubic feet)	METHOD OF PLACEMENT		
	FROM	TO						
				N/A				

FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 04/30/19)

FILE NO. C-4624-POD1	POD NO. POD1	TRN NO. 726169
LOCATION 25S.31E.30.4.4.1	WELL TAG ID NO. —	PAGE 1 OF 2



APPENDIX B

Photographic Log



Photographic Log
XTO Energy, Inc
PLU 30 Big Sinks Battery
nAPP2402531902



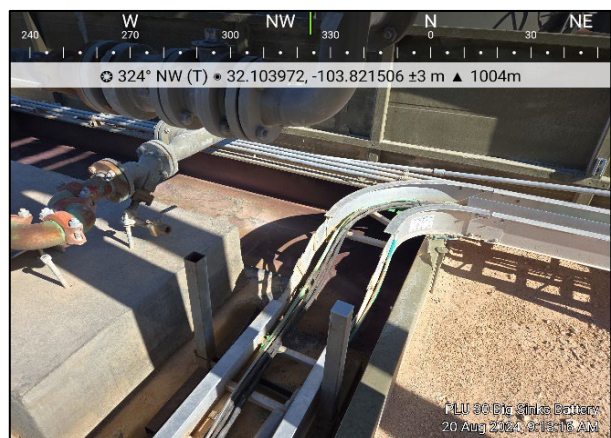
Photograph: 1 Date: 8/20/2024
Description: Sign at entrance of pad
View: East



Photograph: 2 Date: 8/20/2024
Description: Liner integrity inspection
View: East



Photograph: 3 Date: 8/20/2024
Description: Liner integrity inspection
View: Northwest



Photograph: 4 Date: 8/20/2024
Description: Liner integrity inspection
View: Northwest

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Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
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Oil Conservation Division
1220 S. St Francis Dr.
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QUESTIONS

Action 379323

QUESTIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 379323
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2402531902
Incident Name	NAPP2402531902 PLU 30 BIG SINKS BATTERY @ 0
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received

Location of Release Source

Please answer all the questions in this group.

Site Name	PLU 30 Big Sinks Battery
Date Release Discovered	01/14/2024
Surface Owner	Federal

Incident Details

Please answer all the questions in this group.

Incident Type	Produced Water Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release

Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.

Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Equipment Failure Pump Produced Water Released: 11 BBL Recovered: 11 BBL Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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QUESTIONS, Page 2

Action 379323

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:	5380
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QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	No
Reasons why this would be considered a submission for a notification of a major release	Unavailable.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

Initial Response

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

The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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.

I hereby agree and sign off to the above statement	Name: Amy Ruth Title: Coordinator SSHE Environmental Email: amy.ruth@exxonmobil.com Date: 08/29/2024
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QUESTIONS, Page 3

Action 379323

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:	5380
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	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS**Site Characterization**

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). 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 in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 1000 (ft.) and ½ (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between ½ and 1 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Medium
A 100-year floodplain	Between 1 and 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	01/14/2024
On what date will (or did) the final sampling or liner inspection occur	08/20/2024
On what date will (or was) the remediation complete(d)	08/20/2024
What is the estimated surface area (in square feet) that will be remediated	62
What is the estimated volume (in cubic yards) that will be remediated	0
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 4

Action 379323

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 379323
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
<i>(Select all answers below that apply.)</i>	
Is (or was) there affected material present needing to be removed	No
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	Not answered.
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
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.	
I hereby agree and sign off to the above statement	Name: Amy Ruth Title: Coordinator SSHE Environmental Email: amy.ruth@exxonmobil.com Date: 08/29/2024
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 6

Action 379323

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:
	5380
	Action Number:
	379323
Action Type:	
[C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	373411
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	08/20/2024
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	62

Remediation Closure Request

Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.

Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	62
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	Liner integrity inspection activities were conducted following a release of produced water within a lined containment at the Site. Following removal of all fluids, a liner integrity inspection was conducted by Ensolum personnel on August 20, 2024. Upon inspection, no rips, tears, holes, or damage were observed, and the liner was determined to be sufficient. The release was contained laterally by the lined containment and the liner was performing as designed. Based on initial response efforts and the liner operating as designed, XTO respectfully requests closure for Incident Number nAPP2402531902.

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (in .pdf format) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

I hereby agree and sign off to the above statement	Name: Amy Ruth Title: Coordinator SSHE Environmental Email: amy.ruth@exxonmobil.com Date: 08/29/2024
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CONDITIONS

Action 379323

CONDITIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 379323
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	We have received your Remediation Closure Report for Incident #NAPP2402531902 PLU 30 BIG SINKS BATTERY, thank you. This Remediation Closure Report is approved.	9/4/2024