



September 13, 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
PLU Pierce Canyon 20-24-30
Incident Number nAPP2417077386
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 Pierce Canyon 20-24-30 (Site) following a release of produced water within a lined containment. Based on the liner integrity inspection activities, XTO is submitting this *Closure Request*, describing assessment activities that have occurred and requesting no further action and closure for Incident Number nAPP2417077386.

SITE DESCRIPTION AND RELEASE SUMMARY

The Site is located in Unit O, Section 17, Township 24 South, Range 30 East, in Eddy County, New Mexico (32.21062°, -103.90027°) and is associated with oil and gas exploration and production operations on Federal land managed by the Bureau of Land Management (BLM).

On June 15, 2024, equipment corrosion resulted in the release of approximately 5 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) submitted on June 18, 2024 and subsequently submitted an Initial Release C-141 Application (C-141) on August 13, 2024. The release was assigned Incident Number nAPP2417077386.

SITE CHARACTERIZATION AND CLOSURE CRITERIA

The Site was characterized to assess the applicability of Table I 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 estimated to be greater than 100 feet below ground surface (bgs) based on a recent soil boring drilled for determination of regional groundwater depth. Soil boring C-04676 POD 1 was drilled 0.84 miles west of the Site to a depth of 120 feet bgs. No groundwater was observed. The Well Record and Log is included in Appendix A.

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

XTO Energy, Inc
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- Benzene: 10 milligrams per kilogram (mg/kg)
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg
- Total petroleum hydrocarbons (TPH): 100 mg/kg
- Chloride: 600 mg/kg

LINER INTEGRITY INSPECTION ACTIVITIES

A 48-hour advance notice of the liner inspection was submitted to the NMOCD on June 24, 2024. A liner integrity inspection was conducted by Ensolum personnel on June 26, 2024. The lined containment was cleaned of all debris, power washed and inspected and was determined to be operating as designed. Upon inspection, no rips, tears, holes, or damage was observed. The liner was determined to be sufficient, and all released fluids were recovered. 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. A liner integrity inspection was conducted by Ensolum personnel on June 26, 2024. Upon inspection, no rips, tears, holes, or damage was 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 nAPP2417077386.

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

Sincerely,
Ensolum, LLC



Tracy Hillard
Staff Engineer



Tacoma Morrissey
Assistant Principal

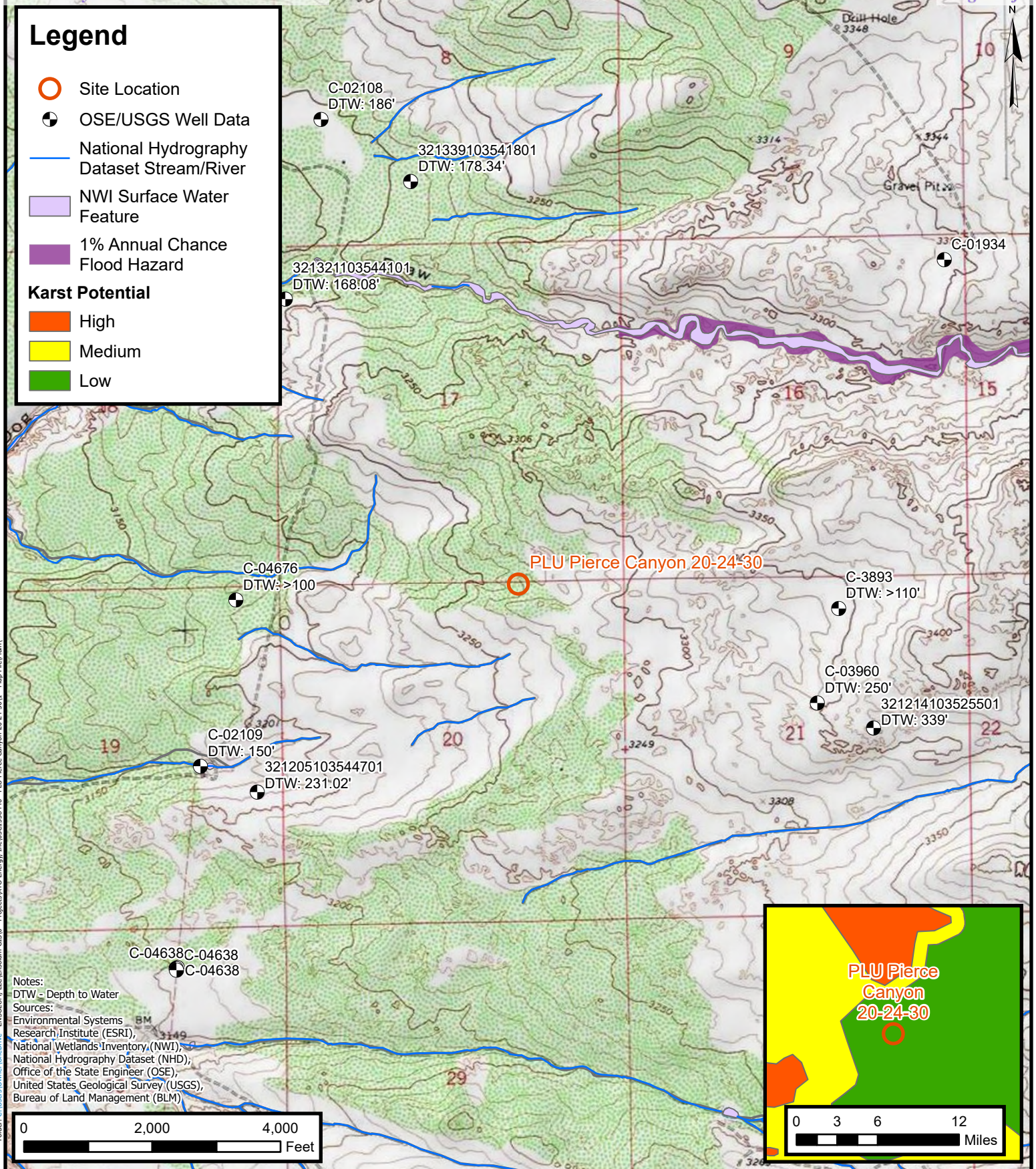
Cc: Amy Ruth, XTO
Amanda Garcia, XTO
BLM

Appendices:

Figure 1	Site Receptor Map
Figure 2	Release Map
Appendix A	Referenced Well Records
Appendix B	Photographic Log



FIGURES



Site Receptor Map

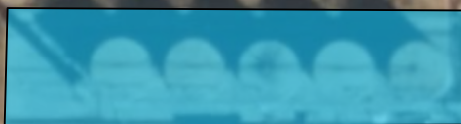
XTO Energy, Inc
PLU Pierce Canyon 20-24-30
Incident Number: nAPP2417077386
Unit O, Section 17, T 24S, R 30E
Eddy County, New Mexico

FIGURE

1

Legend

 Liner Containment Area



0 12.5 25 50 75 100
Feet

Sources: Environmental Systems Research Institute (ESRI)



Lined Containment Area

XTO Energy, Inc
PLU Pierce Canyon 20-24-30
Incident Number: nAPP2417077386
Unit O, Section 17, T 24S, R 30E
Eddy County, New Mexico

FIGURE
2



APPENDIX A

Referenced Well Records



WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

www.ose.state.nm.us

OSE 011 DEC 21 2022 PM 3:14

1. GENERAL AND WELL LOCATION	OSE POD NO. (WELL NO.) C-04676 POD 1		WELL TAG ID NO.		OSE FILE NO(S). C-04676		
	WELL OWNER NAME(S) XTO ENERGY INC				PHONE (OPTIONAL) 575-200-0729		
	WELL OWNER MAILING ADDRESS 3104 E GREENE ST				CITY STATE ZIP CARLSBAD NM 88220		
	WELL LOCATION (FROM GPS)	DEGREES LATITUDE 32	MINUTES 12	SECONDS 32.66 N	* ACCURACY REQUIRED: ONE TENTH OF A SECOND * DATUM REQUIRED: WGS 84		
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS – PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE POKER LAKE UNIT # 231							
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 11/22/22		DRILLING ENDED 11/22/22		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) N/A				
	DRILLING FLUID: <input checked="" type="checkbox"/> AIR <input type="checkbox"/> MUD ADDITIVES – SPECIFY:						
	DRILLING METHOD: <input checked="" type="checkbox"/> ROTARY <input type="checkbox"/> HAMMER <input type="checkbox"/> CABLE TOOL <input type="checkbox"/> OTHER – SPECIFY:						
	DEPTH (feet bgl) FROM TO		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)
				NO CASING IN HOLE			
3. ANNULAR MATERIAL	DEPTH (feet bgl) FROM TO		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL		AMOUNT (cubic feet)	METHOD OF PLACEMENT
				N/A			

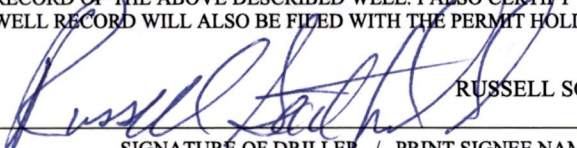
FOR OSE INTERNAL USE

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

FILE NO. C-04676	POD NO. 1	TRN NO. 736286
LOCATION 245.30E.19.1.2.2	WELL TAG ID NO.	PAGE 1 OF 2

4. HYDROGEOLOGIC LOG OF WELL	DEPTH (feet bgl)		THICKNESS (feet)	COLOR AND TYPE OF MATERIAL ENCOUNTERED - INCLUDE WATER-BEARING CAVITIES OR FRACTURE ZONES (attach supplemental sheets to fully describe all units)	WATER BEARING? (YES / NO)	ESTIMATED YIELD FOR WATER- BEARING ZONES (gpm)
	FROM	TO				
	0	1		CALICHIE PAD	Y ✓ N	
	1	120		RED SAND	Y ✓ N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
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					Y N	
					Y N	
					Y N	
METHOD USED TO ESTIMATE YIELD OF WATER-BEARING STRATA:					TOTAL ESTIMATED WELL YIELD (gpm):	
<input type="checkbox"/> PUMP <input type="checkbox"/> AIR LIFT <input type="checkbox"/> BAILER <input checked="" type="checkbox"/> OTHER – SPECIFY: DRY HOLE					0.00	

5. TEST; RIG SUPERVISION	WELL TEST	TEST RESULTS - ATTACH A COPY OF DATA COLLECTED DURING WELL TESTING, INCLUDING DISCHARGE METHOD, START TIME, END TIME, AND A TABLE SHOWING DISCHARGE AND DRAWDOWN OVER THE TESTING PERIOD.
	MISCELLANEOUS INFORMATION:	
	<p style="text-align: right;">OSE 011 DEC 21 2022 PM 3:14</p>	
PRINT NAME(S) OF DRILL RIG SUPERVISOR(S) THAT PROVIDED ONSITE SUPERVISION OF WELL CONSTRUCTION OTHER THAN LICENSEE: RUSSELL SOUTHERLAND		

6. SIGNATURE	BY SIGNING BELOW, I CERTIFY THAT TO THE BEST OF MY KNOWLEDGE AND BELIEF, THE FOREGOING IS A TRUE AND CORRECT RECORD OF THE ABOVE DESCRIBED WELL. I ALSO CERTIFY THAT THE WELL TAG, IF REQUIRED, HAS BEEN INSTALLED AND THAT THIS WELL RECORD WILL ALSO BE FILED WITH THE PERMIT HOLDER WITHIN 30 DAYS AFTER THE COMPLETION OF WELL DRILLING.	
	 _____ SIGNATURE OF DRILLER / PRINT SIGNED NAME	RUSSELL SOUTHERLAND _____ DATE

FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 04/30/2019)

FILE NO. C-04676	POD NO. 1	TRN NO. 736286
LOCATION 245.30E.19.1.2.2.	WELL TAG ID NO.	PAGE 2 OF 2



APPENDIX B

Photographic Log



Photographic Log

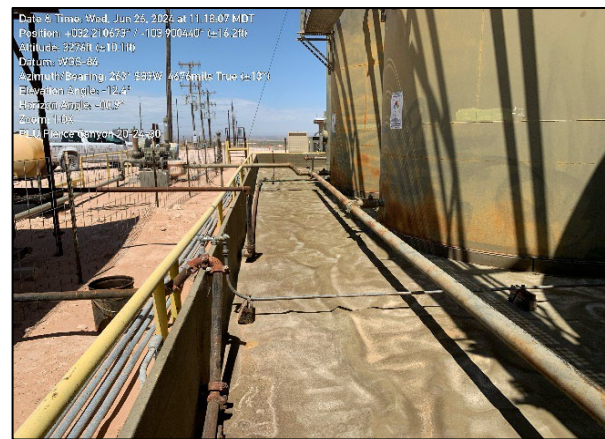
XTO Energy, Inc

PLU Pierce Canyon 20-24-30

NAPP2417077386



Photograph: 1 Date: 06/26/2024
Description: Well sign on pad
View: North



Photograph: 2 Date: 6/26/2024
Description: Liner integrity inspection
View: West



Photograph: 3 Date: 6/26/2024
Description: Liner integrity inspection
View: South



Photograph: 4 Date: 6/26/2024
Description: Liner integrity inspection
View: Northeast

**Photographic Log**

XTO Energy, Inc
 PLU Pierce Canyon 20-24-30
 NAPP2417077386



Photograph: 5 Date: 06/26/2024
 Description: Liner integrity inspection
 View: East



Photograph: 6 Date: 6/26/2024
 Description: Liner integrity inspection
 View: North



Photograph: 7 Date: 6/26/2024
 Description: Liner integrity inspection
 View: Southeast



Photograph: 8 Date: 6/26/2024
 Description: Liner integrity inspection
 View: East

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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
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QUESTIONS

Action 383424

QUESTIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 383424
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2417077386
Incident Name	NAPP2417077386 PLU PIERCE CANYON 20-24-30 @ 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 Pierce Canyon 20-24-30
Date Release Discovered	06/15/2024
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: Corrosion Valve Produced Water Released: 5 BBL Recovered: 5 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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Action 383424

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:	5380
	Action Number:	383424
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	More info needed to determine if this will be treated as 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	<i>Unavailable.</i>
<i>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.</i>	

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	<i>Not answered.</i>

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: Colton Brown Title: Environmental Advisor Email: colton.s.brown@exxonmobil.com Date: 09/13/2024
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QUESTIONS, Page 3

Action 383424

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:
	5380
	Action Number:
	383424
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	OCD Imaging Records Lookup
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)	Between 1 and 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 1000 (ft.) and ½ (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Between 1 and 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Between ½ and 1 (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
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.	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
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.	
On what estimated date will the remediation commence	06/15/2024
On what date will (or did) the final sampling or liner inspection occur	06/26/2024
On what date will (or was) the remediation complete(d)	06/26/2024
What is the estimated surface area (in square feet) that will be remediated	3950
What is the estimated volume (in cubic yards) that will be remediated	0
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.	
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.	

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Action 383424

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 383424
	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	Yes
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: Colton Brown Title: Environmental Advisor Email: colton.s.brown@exxonmobil.com Date: 09/13/2024
<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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Action 383424

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 383424
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	356904
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	06/26/2024
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	3950

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	3950
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. A liner integrity inspection was conducted by Ensolum personnel on June 26, 2024. Upon inspection, no rips, tears, holes, or damage was 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 nAPP2417077386.

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: Colton Brown Title: Environmental Advisor Email: colton.s.brown@exxonmobil.com Date: 09/13/2024
--	--

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CONDITIONS

Action 383424

CONDITIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 383424
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	App ID 383424 Liner Inspection approved	9/19/2024