



August 22, 2024

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

**Re: Closure Request**  
**PLU 21 Brushy Draw West CTB**  
**Incident Number NAPP2415552477**  
**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 site assessment and soil sampling activities performed at the PLU 21 Brushy Draw West CTB (Site). The purpose of the site assessment and soil sampling activities was to assess for the presence or absence of impacts to soil resulting from a rental trash trailer/porta-potty combo catching fire at the Site. Based on field observations, field screening activities, and soil sample laboratory analytical results, XTO is submitting this *Closure Request*, describing soil sampling activities that have occurred and requesting no further action for Incident Number NAPP2415552477.

## **SITE DESCRIPTION AND SUMMARY**

The Site is located in Unit K, Section 21, Township 25 South, Range 30 East, in Eddy County, New Mexico (32.112240°, -103.88917°) and is associated with oil and gas exploration and production operations on private land owned by Janey Paschal.

On May 27, 2024, a rental trash trailer/porta-potty combo caught fire from an unknown source. No release was associated from the incident and the fire was extinguished upon discovery. XTO reported the fire to the New Mexico Oil Conservation Division (NMOCD) and submitted an Initial C-141 Application (C-141) on June 3, 2024, and the fire incident was assigned Incident Number NAPP2415552477.

## **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.

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 United States Geological Survey (USGS) well (USGS 320629103533002), located approximately 0.33 miles southwest of the Site. The USGS 320629103533002 well has a reported depth to groundwater of 265 feet bgs and a total depth of 280 feet bgs as of November 6, 1992. The referenced well records are included in Appendix A.

The closest continuously flowing or significant watercourse to the Site is a dry wash, located approximately 872 feet south 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 (low potential karst designation area). Potential Site receptors are identified on Figure 1.

Based on the most recent well data from groundwater well USGS 320629103533002 exceeding 25 years in age, a guideline preferred by the NMOCD, 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): 100 mg/kg
- Chloride: 600 mg/kg

## INITIAL SITE ASSESSMENT ACTIVITIES AND ANALYTICAL RESULTS

On June 19, 2024, Site assessment activities were conducted to evaluate the area of concern based on information provided on the C-141 and visual observations. Four delineation soil samples (SS01 through SS04) were collected around the area of concern from a depth of 0.5 feet bgs to assess for the presence or absence of impacted soil. The delineation soil samples were field screened for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID) and chloride using Hach® chloride QuanTab® test strips. The area of concern and soil sample locations were mapped utilizing a handheld Global Positioning System (GPS) unit and are depicted on Figure 2.

The soil samples were placed directly 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 transported under strict chain-of-custody procedures to Cardinal Laboratories (Cardinal) in Hobbs, New Mexico, for analysis of the following constituents of concern (COC): BTEX following United States Environmental Protection Agency (EPA) Method 8021B; TPH-gasoline range organics (GRO), TPH-diesel range organics (DRO), and TPH-oil range organics (ORO) following EPA Method 8015M/D; and chloride following Standards Method 4500.

Laboratory analytical results for delineation soil samples SS01 through SS04 indicated that all COC concentrations were compliant with Closure Criteria. Based on laboratory analytical results from SS01 through SS04, the lateral extent of the area of concern is successfully defined. Photographic documentation was conducted during the Site visit and is presented in a Photographic Log included in Appendix B.

## DELINEATION AND SURFACE SCRAPE ACTIVITIES

On July 3, 2024, Ensolum personnel returned to the Site to oversee delineation and surface scraping activities. One pothole (BH01) was advanced via backhoe to a depth of 1-foot bgs within the area of concern. Two discrete soil samples, BH01 and BH01A, were collected from the pothole at depths of 0.5 and 1-foot bgs, respectively. The delineation soil samples were field screened and handled as described above. Field screening results and observations for BH01 were documented on a lithologic/soil sampling log and is included in Appendix C. The delineation soil sample locations are depicted on Figure 2.

The charred surface area resulting from the fire was scraped using a backhoe. Following the surface scraping, Ensolum personnel collected 5-point composite soil samples representing no more than 200

XTO Energy, Inc  
Closure Request  
PLU 21 Brushy Draw West CTB



square feet from the scraped area. The 5-point composite soil samples were collected by placing five equivalent aliquots of soil into a 1-gallon, resealable plastic bag and homogenizing the samples by thoroughly mixing. Three confirmation soil samples (CS01 through CS03) were collected within the scraped area at a depth of 0.3 feet bgs. Soil from the delineation and confirmation soil samples were field screened utilizing the same method mentioned above. The confirmation soil samples were handled and analyzed for the same analytes described above. The confirmation soil sample locations are depicted on Figure 3.

The final surface scrape area was approximately 560 square feet. A total of approximately 10 cubic yards of soil was removed during the surface scraping activities. The soil was transported and properly disposed of at the OWL Landfill Services, LLC disposal facility located in Jal, New Mexico.

## LABORATORY ANALYTICAL RESULTS

Laboratory analytical results for all delineation and confirmation soil samples collected indicate that all COC concentrations were compliant with the most stringent Table I Closure Criteria. Laboratory analytical results are summarized in Table 1 and the complete laboratory analytical reports are included as Appendix D.

## CLOSURE REQUEST

Site assessment activities were conducted at the Site to assess for the presence or absence of impacted soil resulting from the May 27, 2024, fire. Laboratory analytical results for soil samples collected within and around the area of concern indicated that all COC concentrations were compliant with the Site Closure Criteria and the most stringent Table I Closure Criteria, confirming no fluids were released to the surface of the well pad.

Based on initial response efforts and soil sample laboratory analytical results compliant with the most stringent Table I Closure Criteria, no further remediation was required. XTO believes these remedial actions are protective of human health, the environment, and groundwater and respectfully requests closure for Incident Number NAPP2415552477.

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

Sincerely,  
**Ensolum, LLC**

A handwritten signature in black ink, appearing to read "D.A. McInnis".

David A. McInnis  
Project Geologist

A handwritten signature in black ink, appearing to read "T Morrissey".

Tacoma Morrissey  
Associate Principal

cc: Amy Ruth, XTO  
Kaylan Dirkx, XTO  
Janey Paschal

XTO Energy, Inc  
Closure Request  
PLU 21 Brushy Draw West CTB



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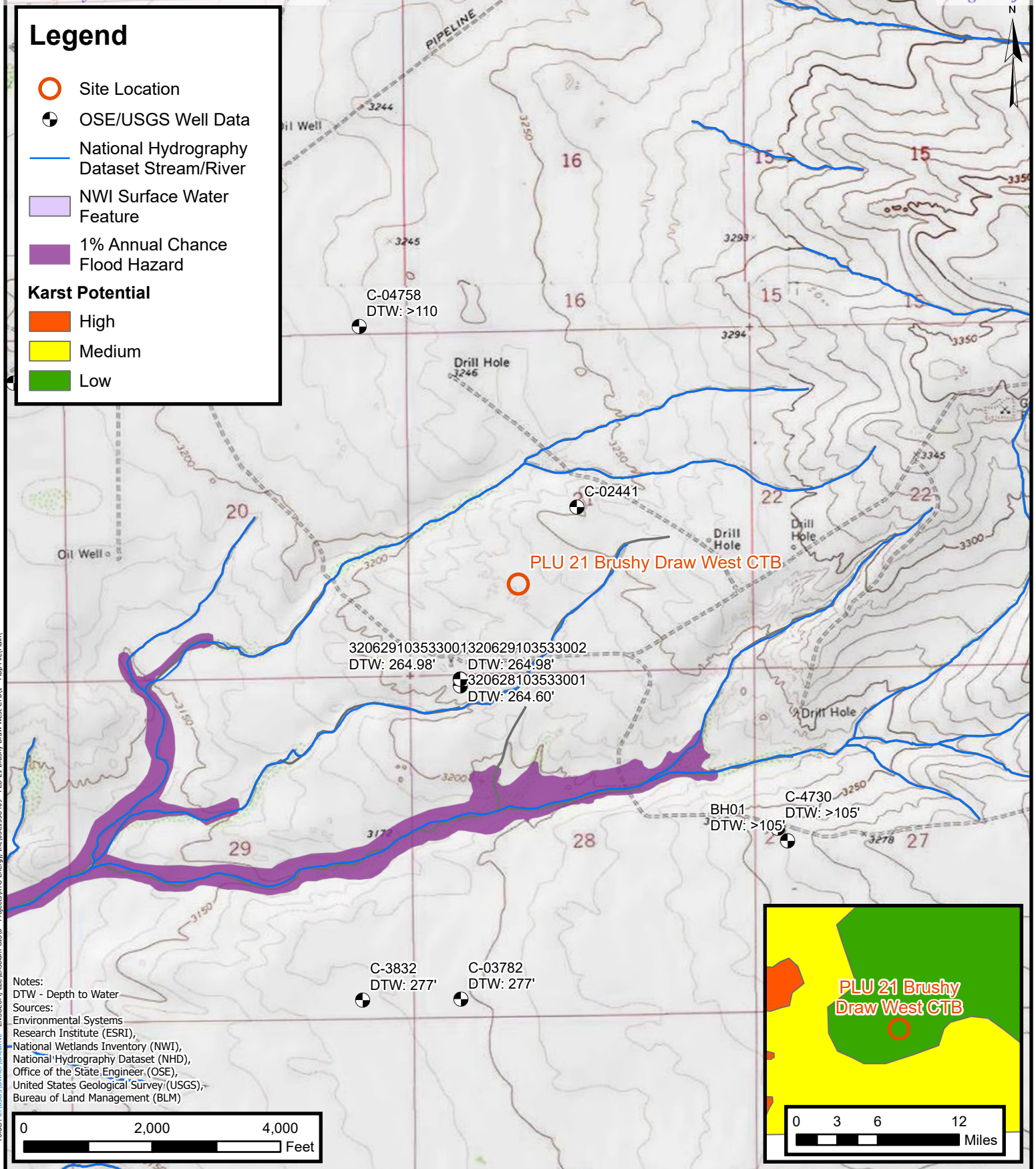
Appendices:

Figure 1	Site Receptor Map
Figure 2	Delineation Soil Sample Locations
Figure 3	Confirmation Soil Sample Locations
Table 1	Soil Sample Analytical Results
Appendix A	Referenced Well Records
Appendix B	Photographic Log
Appendix C	Lithologic Soil Sampling Logs
Appendix D	Laboratory Analytical Reports & Chain-of-Custody Documentation



FIGURES





## Site Receptor Map

XTO Energy, Inc  
PLU 21 Brushy Draw West CTB  
Incident Number: NAPP2415552477  
Unit K, Sec 21, T 25S, R 30E  
Eddy County, New Mexico

FIGURE

1

**Legend**

- Assessment Soil Sample in Compliance with Closure Criteria
- Trailer Location
- ▨ Area of Concern



BH01@0.5'  
BH01A@1'

SS02@0.5'

SS01@0.5'

SS03@0.5'

SS04@0.5'

Notes:  
Sample ID @ Depth Below Ground Surface.

0 5 10 20 30 40  
Feet

Sources: Environmental Systems Research Institute (ESRI)



## Delineation Soil Sample Locations

XTO Energy, Inc  
PLU 21 Brushy Draw West CTB  
Incident Number: NAPP2415552477  
Unit K, Sec 21, T 25S, R 30E  
Eddy County, New Mexico

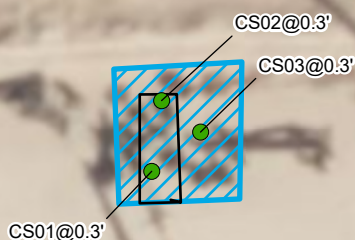
## FIGURE

## 2

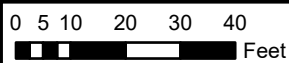


## Legend

- Confirmation Soil Sample in Compliance with Closure Criteria
- Trailer Location
- Surface Scrape Area



Notes:  
Sample ID @ Depth Below Ground Surface.



Sources: Environmental Systems Research Institute (ESRI)



## Confirmation Soil Sample Locations

XTO Energy, Inc  
PLU 21 Brushy Draw West CTB  
Incident Number: NAPP2415552477  
Unit K, Sec 21, T 25S, R 30E  
Eddy County, New Mexico

FIGURE

3





TABLES



**TABLE 1**  
**SOIL SAMPLE ANALYTICAL RESULTS**  
**PLU 21 Brushy Draw West CTB**  
**XTO Energy, Inc**  
**Eddy County, New Mexico**

Sample I.D.	Sample Date	Sample Depth (feet bgs)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)	TPH ORO (mg/kg)	GRO+DRO (mg/kg)	Total TPH (mg/kg)	Chloride (mg/kg)
<b>NMOCD Table I Closure Criteria (NMAC 19.15.29)</b>			<b>10</b>	<b>50</b>	<b>NE</b>	<b>NE</b>	<b>NE</b>	<b>NE</b>	<b>100</b>	<b>600</b>
<b>Delineation Soil Samples</b>										
SS01	06/19/2024	0.5	<0.050	<0.300	<0.010	<0.010	<0.010	<0.010	<0.010	48.0
SS02	06/19/2024	0.5	<0.050	<0.300	<0.010	<0.010	<0.010	<0.010	<0.010	32.0
SS03	06/19/2024	0.5	<0.050	<0.300	<0.010	<0.010	<0.010	<0.010	<0.010	128
SS04	06/19/2024	0.5	<0.050	<0.300	<0.010	<0.010	<0.010	<0.010	<0.010	48.0
BH01	07/03/2024	0.5	<0.050	<0.300	<0.010	<0.010	<0.010	<0.010	<0.010	80.0
BH01A	07/03/2024	1	<0.050	<0.300	<0.010	<0.010	<0.010	<0.010	<0.010	112
<b>Confirmation Soil Samples</b>										
CS01	07/03/2024	0.3	<0.050	<0.300	<0.010	<0.010	<0.010	<0.010	<0.010	80.0
CS02	07/03/2024	0.3	<0.050	<0.300	<0.010	<0.010	<0.010	<0.010	<0.010	32.0
CS03	07/03/2024	0.3	<0.050	<0.300	<0.010	<0.010	<0.010	<0.010	<0.010	48.0

## Notes:

bgs: below ground surface

mg/kg: milligrams per kilogram

NMOCD: New Mexico Oil Conservation Division

BTEX: Benzene, Toluene, Ethylbenzene, and Xylenes

Concentrations in **bold** exceed the NMOCD Table I Closure Criteria or reclamation requirement where applicable.

GRO: Gasoline Range Organics

DRO: Diesel Range Organics

ORO: Oil Range Organics

TPH: Total Petroleum Hydrocarbon

NMAC: New Mexico Administrative Code

Grey text indicates soil sample removed during excavation activities



## APPENDIX A

### Referenced Well Records

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National Water Information System: Web Interface

USGS Water Resources

Data Category:

Groundwater

Geographic Area:

New Mexico

GO

Click to hideNews Bulletins

- Explore the NEW [USGS National Water Dashboard](#) interactive map to access real-time water data from over 13,500 stations nationwide.

Groundwater levels for New Mexico

Click to hide state-specific text

 Important: [Next Generation Monitoring Location Page](#)

Search Results -- 1 sites found

Agency code = usgs

site\_no list =

- 320629103533002

Minimum number of levels = 1  
[Save file of selected sites](#) to local disk for future upload

USGS 320629103533002 25S.30E.21.33342 A

Eddy County, New Mexico  
Latitude 32°06'29", Longitude 103°53'30" NAD27  
Land-surface elevation 3,209 feet above NAVD88  
The depth of the well is 280 feet below land surface.  
This well is completed in the Pecos River Basin alluvial aquifer (N100PCSRVR) national aquifer.  
This well is completed in the Alluvium, Bolson Deposits and Other Surface Deposits (110AVMB) local aquifer.

Output formats

[Table of data](#)

[Tab-separated data](#)

[Graph of data](#)

[Reselect period](#)

Date	Time	? Water-level date-time accuracy	? Parameter code	Water level, feet below land surface	Water level, feet above specific vertical datum	Referenced vertical datum	? Status	? Method of measurement	? Measuring agency	? Source of measurement
1949-03-10			D	62610	2939.36	NGVD29	P		Z	
1949-03-10			D	62611	2941.00	NAVD88	P		Z	
1949-03-10			D	72019	268.00		P		Z	
1992-11-06			D	62610	2942.38	NGVD29	P		S	
1992-11-06			D	62611	2944.02	NAVD88	P		S	
1992-11-06			D	72019	264.98		P		S	

Explanation

Section	Code	Description
Water-level date-time accuracy	D	Date is accurate to the Day
Parameter code	62610	Groundwater level above NGVD 1929, feet
Parameter code	62611	Groundwater level above NAVD 1988, feet
Parameter code	72019	Depth to water level, feet below land surface



Section	Code	Description
Referenced vertical datum	NAVD88	North American Vertical Datum of 1988
Referenced vertical datum	NGVD29	National Geodetic Vertical Datum of 1929
Status	P	Pumping
Method of measurement	S	Steel-tape measurement.
Method of measurement	Z	Other.
Measuring agency		Not determined
Source of measurement		Not determined
Water-level approval status	A	Approved for publication -- Processing and review completed.

[Questions or Comments](#)  
[Help](#)  
[Data Tips](#)  
[Explanation of terms](#)  
[Subscribe for system changes](#)

[Accessibility](#)   [FOIA](#)   [Privacy](#)   [Policies and Notices](#)  
[U.S. Department of the Interior](#) | [U.S. Geological Survey](#)  
**Title: Groundwater for New Mexico: Water Levels**  
**URL: <https://nwis.waterdata.usgs.gov/nm/nwis/gwlevels?>**



Page Contact Information: [New Mexico Water Data Maintainer](#)  
Page Last Modified: 2024-08-13 14:26:47 EDT  
0.25 0.23 nadww02



## APPENDIX B

### Photographic Log

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## Photographic Log

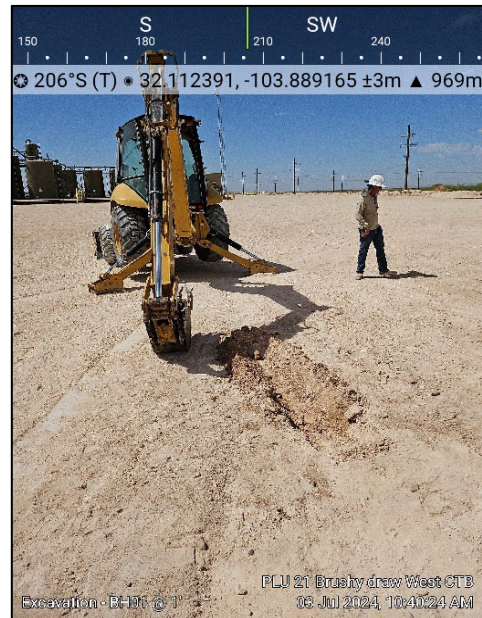
XTO Energy, LLC

PLU 21 Brushy Draw West CTB

Incident Number: nAPP2415552477



Photograph: 1 Date: 06/19/2024  
Description: Surface charring in area of concern  
View: West



Photograph: 2 Date: 07/03/2024  
Description: Delineation activities  
View: South



Photograph: 3 Date: 07/03/2024  
Description: Final surface scrape  
View: North



Photograph: 4 Date: 07/03/2024  
Description: Final surface scrape  
View: Southwest


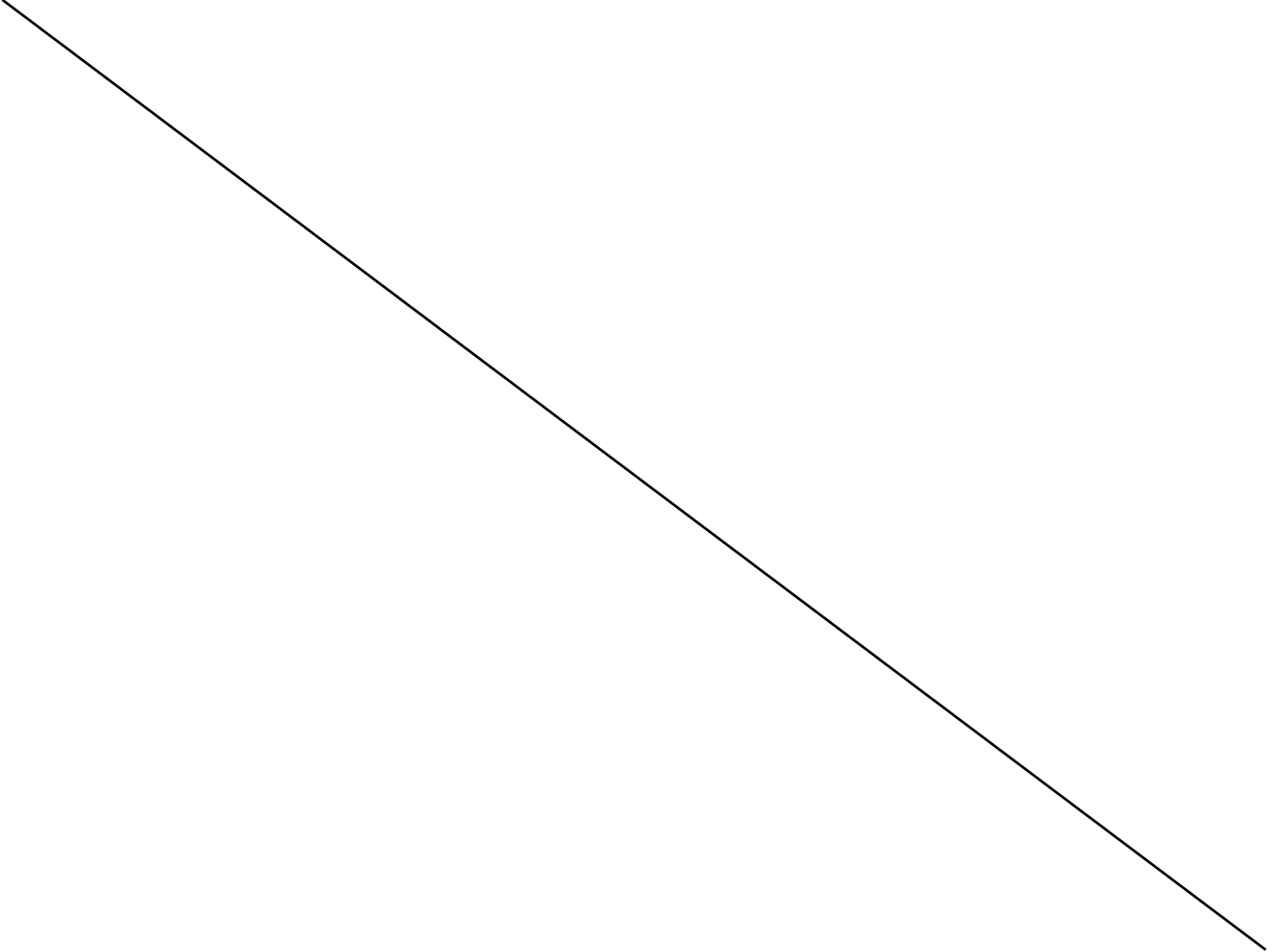


## APPENDIX C

### Lithologic Soil Sampling Logs

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								Sample Name: BH01		Date: 07/03/2024	
								Site Name: PLU 21 Brushy Draw West CTB			
								Incident Number: nAPP2415552477			
								Job Number: 03C1558409			
<b>LITHOLOGIC / SOIL SAMPLING LOG</b>								Logged By: U. Santillana		Method: Backhoe	
Coordinates: 32.112240, -103.88917								Hole Diameter: ~3.5'		Total Depth: 1'	
Comments: Field screening conducted with HACH Chloride Test Strips and PID for chloride and vapor, respectively. Chloride test performed with 1:4 dilution factor of soil to distilled water. All chloride measurements made with a +40% correction factor.											
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions			
M	<164	0.0	N	BH01	0.5	0	SP	Brown sand with silt, poorly graded, no odor, no staining, very fine to fine grained, moist.			
M	<164	0.0	N	BH01A	1	1	SW	Tan sand with silt, well graded, no odor, no staining, very fine to fine grained, moist.			
Total Depth @ 1' bgs.											
											



## APPENDIX D

### Laboratory Analytical Reports & Chain of Custody Documentation

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PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

June 26, 2024

TACOMA MORRISSEY

ENSOLUM

3122 NATIONAL PARKS HWY

CARLSBAD, NM 88220

RE: PLU 21 BRUSHY DRAW CTB WEST

Enclosed are the results of analyses for samples received by the laboratory on 06/20/24 14:18.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style with a large, stylized 'C' at the beginning.

Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM  
TACOMA MORRISSEY  
3122 NATIONAL PARKS HWY  
CARLSBAD NM, 88220  
Fax To:

Received: 06/20/2024  
Reported: 06/26/2024  
Project Name: PLU 21 BRUSHY DRAW CTB WEST  
Project Number: 03C1558409  
Project Location: XTO 32.112240,-103.88917

Sampling Date: 06/19/2024  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Alyssa Parras

**Sample ID: SS 01 0.5' (H243640-01)**

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/24/2024	ND	1.91	95.3	2.00	0.524	
Toluene*	<0.050	0.050	06/24/2024	ND	1.86	93.2	2.00	0.0720	
Ethylbenzene*	<0.050	0.050	06/24/2024	ND	2.01	100	2.00	0.148	
Total Xylenes*	<0.150	0.150	06/24/2024	ND	5.91	98.5	6.00	0.212	
Total BTEX	<0.300	0.300	06/24/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 99.4 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	06/24/2024	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/24/2024	ND	187	93.5	200	1.34	
DRO >C10-C28*	<10.0	10.0	06/24/2024	ND	189	94.5	200	4.77	
EXT DRO >C28-C36	<10.0	10.0	06/24/2024	ND					

Surrogate: 1-Chlorooctane 54.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 53.1 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager





PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM  
TACOMA MORRISSEY  
3122 NATIONAL PARKS HWY  
CARLSBAD NM, 88220  
Fax To:

Received: 06/20/2024  
Reported: 06/26/2024  
Project Name: PLU 21 BRUSHY DRAW CTB WEST  
Project Number: 03C1558409  
Project Location: XTO 32.112240,-103.88917

Sampling Date: 06/19/2024  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Alyssa Parras

**Sample ID: SS 02 0.5' (H243640-02)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/24/2024	ND	1.91	95.3	2.00	0.524	
Toluene*	<0.050	0.050	06/24/2024	ND	1.86	93.2	2.00	0.0720	
Ethylbenzene*	<0.050	0.050	06/24/2024	ND	2.01	100	2.00	0.148	
Total Xylenes*	<0.150	0.150	06/24/2024	ND	5.91	98.5	6.00	0.212	
Total BTEX	<0.300	0.300	06/24/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 99.9 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	06/24/2024	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/24/2024	ND	187	93.5	200	1.34	
DRO >C10-C28*	<10.0	10.0	06/24/2024	ND	189	94.5	200	4.77	
EXT DRO >C28-C36	<10.0	10.0	06/24/2024	ND					

Surrogate: 1-Chlorooctane 63.8 % 48.2-134

Surrogate: 1-Chlorooctadecane 61.5 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM  
TACOMA MORRISSEY  
3122 NATIONAL PARKS HWY  
CARLSBAD NM, 88220  
Fax To:

Received: 06/20/2024  
Reported: 06/26/2024  
Project Name: PLU 21 BRUSHY DRAW CTB WEST  
Project Number: 03C1558409  
Project Location: XTO 32.112240,-103.88917

Sampling Date: 06/19/2024  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Alyssa Parras

**Sample ID: SS 03 0.5' (H243640-03)**

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/24/2024	ND	1.91	95.3	2.00	0.524	
Toluene*	<0.050	0.050	06/24/2024	ND	1.86	93.2	2.00	0.0720	
Ethylbenzene*	<0.050	0.050	06/24/2024	ND	2.01	100	2.00	0.148	
Total Xylenes*	<0.150	0.150	06/24/2024	ND	5.91	98.5	6.00	0.212	
Total BTX	<0.300	0.300	06/24/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 101 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	128	16.0	06/24/2024	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/24/2024	ND	187	93.5	200	1.34	
DRO >C10-C28*	<10.0	10.0	06/24/2024	ND	189	94.5	200	4.77	
EXT DRO >C28-C36	<10.0	10.0	06/24/2024	ND					

Surrogate: 1-Chlorooctane 68.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 66.8 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM  
TACOMA MORRISSEY  
3122 NATIONAL PARKS HWY  
CARLSBAD NM, 88220  
Fax To:

Received: 06/20/2024  
Reported: 06/26/2024  
Project Name: PLU 21 BRUSHY DRAW CTB WEST  
Project Number: 03C1558409  
Project Location: XTO 32.112240,-103.88917

Sampling Date: 06/19/2024  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Alyssa Parras

**Sample ID: SS 04 0.5' (H243640-04)**

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/24/2024	ND	1.91	95.3	2.00	0.524	
Toluene*	<0.050	0.050	06/24/2024	ND	1.86	93.2	2.00	0.0720	
Ethylbenzene*	<0.050	0.050	06/24/2024	ND	2.01	100	2.00	0.148	
Total Xylenes*	<0.150	0.150	06/24/2024	ND	5.91	98.5	6.00	0.212	
Total BTX	<0.300	0.300	06/24/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 101 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	06/24/2024	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/24/2024	ND	211	106	200	1.86	
DRO >C10-C28*	<10.0	10.0	06/24/2024	ND	211	105	200	1.78	
EXT DRO >C28-C36	<10.0	10.0	06/24/2024	ND					

Surrogate: 1-Chlorooctane 87.8 % 48.2-134

Surrogate: 1-Chlorooctadecane 86.4 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- \*\* Samples not received at proper temperature of 6°C or below.
- \*\*\* Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C  
Samples reported on an as received basis (wet) unless otherwise noted on report

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*Celey D. Keene*

Celey D. Keene, Lab Director/Quality Manager





**101 East Marland, Hobbs, NM 88240**  
**(575) 393-2326 FAX (575) 393-2476**

## **CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

[illegible]



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

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July 10, 2024

BEN BELILL

ENSOLUM

3122 NATIONAL PARKS HWY

CARLSBAD, NM 88220

RE: PLU 21 BRUSHY DRAW WEST CTB

Enclosed are the results of analyses for samples received by the laboratory on 07/03/24 14:10.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM  
BEN BELILL  
3122 NATIONAL PARKS HWY  
CARLSBAD NM, 88220  
Fax To:

Received: 07/03/2024  
Reported: 07/10/2024  
Project Name: PLU 21 BRUSHY DRAW WEST CTB  
Project Number: 03C1558409  
Project Location: XTO 32.112240,-103.88917

Sampling Date: 07/03/2024  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Shalyn Rodriguez

**Sample ID: CS 01 0.3 (H244012-01)**

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/09/2024	ND	1.98	99.2	2.00	5.81	
Toluene*	<0.050	0.050	07/09/2024	ND	2.25	113	2.00	0.00	
Ethylbenzene*	<0.050	0.050	07/09/2024	ND	2.67	133	2.00	9.34	
Total Xylenes*	<0.150	0.150	07/09/2024	ND	7.53	125	6.00	0.00	
Total BTEX	<0.300	0.300	07/09/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 121 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	80.0	16.0	07/09/2024	ND	416	104	400	7.41		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	07/09/2024	ND	97.6	97.6	100	8.17	
DRO >C10-C28*	<10.0	10.0	07/09/2024	ND	91.1	91.1	100	8.82	
EXT DRO >C28-C36	<10.0	10.0	07/09/2024	ND					

Surrogate: 1-Chlorooctane 98.3 % 48.2-134

Surrogate: 1-Chlorooctadecane 101 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

ENSOLUM  
BEN BELILL  
3122 NATIONAL PARKS HWY  
CARLSBAD NM, 88220  
Fax To:

Received: 07/03/2024  
Reported: 07/10/2024  
Project Name: PLU 21 BRUSHY DRAW WEST CTB  
Project Number: 03C1558409  
Project Location: XTO 32.112240,-103.88917

Sampling Date: 07/03/2024  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Shalyn Rodriguez

**Sample ID: CS 02 0.3 (H244012-02)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	07/09/2024	ND	1.98	99.2	2.00	5.81		
Toluene*	<0.050	0.050	07/09/2024	ND	2.25	113	2.00	0.00		
Ethylbenzene*	<0.050	0.050	07/09/2024	ND	2.67	133	2.00	9.34		
Total Xylenes*	<0.150	0.150	07/09/2024	ND	7.53	125	6.00	0.00		
Total BTEX	<0.300	0.300	07/09/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 107 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	07/09/2024	ND	416	104	400	7.41		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	07/09/2024	ND	97.6	97.6	100	8.17	
DRO >C10-C28*	<10.0	10.0	07/09/2024	ND	91.1	91.1	100	8.82	
EXT DRO >C28-C36	<10.0	10.0	07/09/2024	ND					

Surrogate: 1-Chlorooctane 96.5 % 48.2-134

Surrogate: 1-Chlorooctadecane 97.2 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

ENSOLUM  
BEN BELILL  
3122 NATIONAL PARKS HWY  
CARLSBAD NM, 88220  
Fax To:

Received: 07/03/2024  
Reported: 07/10/2024  
Project Name: PLU 21 BRUSHY DRAW WEST CTB  
Project Number: 03C1558409  
Project Location: XTO 32.112240,-103.88917

Sampling Date: 07/03/2024  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Shalyn Rodriguez

**Sample ID: CS 03 0.3 (H244012-03)**

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	07/09/2024	ND	1.98	99.2	2.00	5.81		
Toluene*	<0.050	0.050	07/09/2024	ND	2.25	113	2.00	0.00		
Ethylbenzene*	<0.050	0.050	07/09/2024	ND	2.67	133	2.00	9.34		
Total Xylenes*	<0.150	0.150	07/09/2024	ND	7.53	125	6.00	0.00		
Total BTEX	<0.300	0.300	07/09/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 125 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	07/09/2024	ND	416	104	400	7.41		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	07/09/2024	ND	97.6	97.6	100	8.17	
DRO >C10-C28*	<10.0	10.0	07/09/2024	ND	91.1	91.1	100	8.82	
EXT DRO >C28-C36	<10.0	10.0	07/09/2024	ND					

Surrogate: 1-Chlorooctane 89.3 % 48.2-134

Surrogate: 1-Chlorooctadecane 93.8 % 49.1-148

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

ENSOLUM  
BEN BELILL  
3122 NATIONAL PARKS HWY  
CARLSBAD NM, 88220  
Fax To:

Received: 07/03/2024  
Reported: 07/10/2024  
Project Name: PLU 21 BRUSHY DRAW WEST CTB  
Project Number: 03C1558409  
Project Location: XTO 32.112240,-103.88917

Sampling Date: 07/03/2024  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Shalyn Rodriguez

**Sample ID: BH 01 0.5 (H244012-04)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/09/2024	ND	1.98	99.2	2.00	5.81	
Toluene*	<0.050	0.050	07/09/2024	ND	2.25	113	2.00	0.00	
Ethylbenzene*	<0.050	0.050	07/09/2024	ND	2.67	133	2.00	9.34	
Total Xylenes*	<0.150	0.150	07/09/2024	ND	7.53	125	6.00	0.00	
Total BTEX	<0.300	0.300	07/09/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 106 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	07/09/2024	ND	416	104	400	7.41	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	07/09/2024	ND	97.6	97.6	100	8.17	
DRO >C10-C28*	<10.0	10.0	07/09/2024	ND	91.1	91.1	100	8.82	
EXT DRO >C28-C36	<10.0	10.0	07/09/2024	ND					

Surrogate: 1-Chlorooctane 101 % 48.2-134

Surrogate: 1-Chlorooctadecane 105 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager





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**Analytical Results For:**

ENSOLUM  
BEN BELILL  
3122 NATIONAL PARKS HWY  
CARLSBAD NM, 88220  
Fax To:

Received: 07/03/2024  
Reported: 07/10/2024  
Project Name: PLU 21 BRUSHY DRAW WEST CTB  
Project Number: 03C1558409  
Project Location: XTO 32.112240,-103.88917

Sampling Date: 07/03/2024  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Shalyn Rodriguez

**Sample ID: BH 01A 1 (H244012-05)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/09/2024	ND	1.98	99.2	2.00	5.81	
Toluene*	<0.050	0.050	07/09/2024	ND	2.25	113	2.00	0.00	
Ethylbenzene*	<0.050	0.050	07/09/2024	ND	2.67	133	2.00	9.34	
Total Xylenes*	<0.150	0.150	07/09/2024	ND	7.53	125	6.00	0.00	
Total BTEX	<0.300	0.300	07/09/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 112 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	07/09/2024	ND	416	104	400	7.41	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	07/09/2024	ND	97.6	97.6	100	8.17	
DRO >C10-C28*	<10.0	10.0	07/09/2024	ND	91.1	91.1	100	8.82	
EXT DRO >C28-C36	<10.0	10.0	07/09/2024	ND					

Surrogate: 1-Chlorooctane 104 % 48.2-134

Surrogate: 1-Chlorooctadecane 109 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

- BS1 Blank spike recovery above laboratory acceptance criteria. Results for analyte potentially biased high.
- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- \*\* Samples not received at proper temperature of 6°C or below.
- \*\*\* Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C  
Samples reported on an as received basis (wet) unless otherwise noted on report

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A handwritten signature in black ink, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

<b>Company Name:</b> Ensolum, LLC <b>Project Manager:</b> Ben Bell <b>Address:</b> 3122 National Parks Hwy <b>City:</b> Carlsbad <b>State:</b> NM <b>Zip:</b> 88220 <b>Phone #:</b> 989 854 0852 <b>Fax #:</b> <b>Project #:</b> 989 854 0852 <b>Project Owner:</b> <b>Project Name:</b> PCO 21 Brushy Draw West CTB <b>Project Location:</b> 32.112240, -103.88917 <b>Sampler Name:</b> Daniel Santillana										<b>BILL TO</b> <b>P.O. #:</b> <b>Company:</b> XTO Energy <b>Attn:</b> Amy Ruth <b>Address:</b> 3004 E. Greene St. <b>City:</b> Carlsbad <b>State:</b> NM <b>Zip:</b> 88220 <b>Phone #:</b> <b>Fax #:</b>										<b>ANALYSIS REQUEST</b>																																																																					
<b>PLEASE NOTE:</b> Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analysis. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.																																																																																									
<b>Relinquished By:</b> [Signature] <b>Relinquished By:</b> [Signature] <b>Delivered By:</b> (Circle One) Sampler - UPS - Bus - Other:										<b>Observed Temp. °C</b> <b>Corrected Temp. °C</b>										<b>Sample Condition</b> Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>										<b>CHECKED BY:</b> (Initials)																																																											
<b>Reinforced By:</b> [Signature] <b>Reinforced By:</b> [Signature] <b>Date:</b> 7/3/24 <b>Time:</b> 1410 <b>Received By:</b> [Signature]										<b>Verbal Result:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Add'l Phone #:										<b>All Results are emailed. Please provide Email address:</b> bell11@ensolum.com Usantillana@ensolum.com <b>REMARKS:</b> Cost center: 2191941001 Incident #: 21919415552477 Facility #: 219194153676 <b>Turnaround Time:</b> <input checked="" type="checkbox"/> Standard <input type="checkbox"/> Rush <b>Thermometer ID #:</b> 443-#140 <b>Correction Factor:</b> 0.05°C																																																																					
<b>Lab I.D.</b> H24012										<b>Sample I.D.</b> CS01 CS02 CS03 BH01 BH01A										<b>Depth (feet)</b> 0.3 0.3 0.3 0.5 1										<b>(G)RAB OR (C)OMP.</b> C C C G G										<b># CONTAINERS</b> 1 1 1 1 1										<b>MATRIX</b> GROUNDWATER WASTEWATER SOIL OIL SLUDGE OTHER:										<b>PRESERV.</b> ACID/BASE: ICE / COOL OTHER:										<b>SAMPLING</b> DATE TIME										Chlorides BTEX TPH									

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Oil Conservation Division  
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QUESTIONS

Action 378729

QUESTIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 378729
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2415552477
Incident Name	NAPP2415552477 PLU 21 BRUSHY DRAW WEST CTB @ 0
Incident Type	Fire
Incident Status	Remediation Closure Report Received

Location of Release Source	
Please answer all the questions in this group.	
Site Name	PLU 21 Brushy Draw West CTB
Date Release Discovered	05/27/2024
Surface Owner	Private

Incident Details	
Please answer all the questions in this group.	
Incident Type	Fire
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	Not answered.
Is the concentration of chloride in the produced water >10,000 mg/l	No
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Cause: Other   Other (Specify)   Unknown   Released: 0 BBL (Unknown Released Amount)   Recovered: 0 BBL   Lost: 0 BBL.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Lease Operator reported rental trash trailer/porta-potty combo caught fire for an unknown reason. There was no release associated from the incident and the fire was already extinguished upon discovery. Cause of the fire is unknown.

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Action 378729

**QUESTIONS (continued)**

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**QUESTIONS**

<b>Nature and Volume of Release (continued)</b>	
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	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more; (2) an unauthorized release of a volume that: (a) results in a fire or is the result of a fire.
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: Alan Romero Title: Regulatory Analyst Email: alan.romero1@exxonmobil.com Date: 06/03/2024
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Action 378729

**QUESTIONS (continued)**

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**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	U.S. Geological Survey
Did this release impact groundwater or surface water	No
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Between 500 and 1000 (ft.)
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 1000 (ft.) and ½ (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1000 (ft.) and ½ (mi.)
Any other fresh water well or spring	Between 1000 (ft.) and ½ (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1 and 5 (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	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	No

**Soil Contamination Sampling:** (Provide the highest observable value for each, in milligrams per kilograms.)

Chloride (EPA 300.0 or SM4500 Cl B)	128
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	0
GRO+DRO (EPA SW-846 Method 8015M)	0
BTEX (EPA SW-846 Method 8021B or 8260B)	0
Benzene (EPA SW-846 Method 8021B or 8260B)	0

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	06/19/2024
On what date will (or did) the final sampling or liner inspection occur	07/03/2024
On what date will (or was) the remediation complete(d)	07/03/2024
What is the estimated surface area (in square feet) that will be reclaimed	560
What is the estimated volume (in cubic yards) that will be reclaimed	10
What is the estimated surface area (in square feet) that will be remediated	560
What is the estimated volume (in cubic yards) that will be remediated	10

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 378729

QUESTIONS (continued)

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QUESTIONS

<b>Remediation Plan (continued)</b>	
<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>	
<b>This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:</b>	
<i>(Select all answers below that apply.)</i>	
(Ex Situ) Excavation and <b>off-site</b> disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for <b>off-site</b> disposal	OWL LANDFILL JAL [fJEG1635837366]
<b>OR</b> which OCD approved well (API) will be used for <b>off-site</b> disposal	Not answered.
<b>OR</b> is the <b>off-site</b> disposal site, to be used, out-of-state	Not answered.
<b>OR</b> is the <b>off-site</b> disposal site, to be used, an NMED facility	Not answered.
(Ex Situ) Excavation and <b>on-site</b> remediation (i.e. On-Site Land Farms)	Not answered.
(In Situ) Soil Vapor Extraction	Not answered.
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	Not answered.
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	Not answered.
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	Not answered.
Ground Water Abatement pursuant to 19.15.30 NMAC	Not answered.
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: 08/28/2024
<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 378729

QUESTIONS (continued)

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QUESTIONS

Deferral Requests Only	
Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

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Action 378729

**QUESTIONS (continued)**

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	5380
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	378729
Action Type:	
[C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

**QUESTIONS**

<b>Sampling Event Information</b>	
Last sampling notification (C-141N) recorded	357842
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	07/03/2024
What was the (estimated) number of samples that were to be gathered	5
What was the sampling surface area in square feet	1000

**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	No
All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion	Yes
What was the total surface area (in square feet) remediated	560
What was the total volume (cubic yards) remediated	10
All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX, and 10 mg/kg Benzene	Yes
What was the total surface area (in square feet) reclaimed	560
What was the total volume (in cubic yards) reclaimed	10
Summarize any additional remediation activities not included by answers (above)	Site assessment activities were conducted at the Site to assess for the presence or absence of impacted soil resulting from the May 27, 2024, fire. Laboratory analytical results for soil samples collected within and around the area of concern indicated that all COC concentrations were compliant with the Site Closure Criteria and the most stringent Table I Closure Criteria, confirming no fluids were released to the surface of the well pad.

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: 08/28/2024
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Action 378729

QUESTIONS (continued)

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	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

QUESTIONS

Reclamation Report	
Only answer the questions in this group if all reclamation steps have been completed.	
Requesting a reclamation approval with this submission	No

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CONDITIONS  
  
Action 378729

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CONDITIONS

Created By	Condition	Condition Date
rhamlet	We have received your Remediation Closure Report for Incident #NAPP2415552477 PLU 21 BRUSHY DRAW WEST CTB, thank you. This Remediation Closure Report is approved.	9/24/2024