



December 17, 2024

New Mexico Oil Conservation Division

1220 South St. Francis Street
Santa Fe, New Mexico 87505

**Re: Closure Request
PLU 42 Battery
Incident Number nAPP2426427757
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 and delineation completed at the PLU 42 Battery (Site) following a release of produced water within a lined containment. Based on the liner integrity inspection and delineation activities, XTO is submitting this *Closure Request*, describing liner integrity inspection and delineation activities that have occurred and requesting no further action for Incident Number nAPP2426427757.

SITE DESCRIPTION AND RELEASE SUMMARY

The Site is located in Unit G, Section 10, Township 25 South, Range 30 East in Eddy County, New Mexico (32.1469°, -103.86666°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM).

On September 19, 2024, failure of a transfer pump seal resulted in the release of 10 barrels (bbls) of produced water into a lined containment. A vacuum truck was dispatched to the Site to recover free-standing fluid, and all released fluid was recovered. The pump was repaired and returned to service. XTO reported the release to the New Mexico Oil Conservation Division (NMOCD) on a Notification of Release (NOR) and an Initial C-141 Application (C-141) on September 20, 2024. The release was assigned Incident Number nAPP2426427757.

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 greater than 100 feet below ground surface (bgs) based on a recent soil boring drilled for determination of regional groundwater depth. On August 2, 2023, a soil boring (C-4757) was drilled 0.41 miles north of the Site utilizing air rotary. Soil boring C-4757 was drilled to a depth of 119 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

XTO Energy, Inc.
Closure Request
PLU 42 Battery

was confirmed that groundwater beneath the Site is greater than 119 feet bgs. The borehole was properly abandoned with drill cuttings and hydrated bentonite chips. The Well Record and Log is included in Appendix A.

The closest continuously flowing or significant watercourse is greater than 300 feet from 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).

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 diesel range organics (DRO): 1,000 mg/kg
- TPH: 2,500 mg/kg
- Chloride: 20,000 mg/kg

LINER INTEGRITY INSPECTION ACTIVITIES

After a review of the C-141, internal documents, and initial release photographs, it was confirmed the release occurred within the lined containment. The lined containment was cleaned of all debris, power washed and a 48-hour advance notice of the liner inspection was submitted to the NMOCD on October 9, 2024. On October 17, 2024, the lined containment was inspected by Ensolum personnel and was determined to contain a small tear. Delineation to determine the extent of the release was warranted. A site map of the lined containment is included in Figure 2. Photographic documentation of the inspection is included in Appendix B.

DELINEATION SOIL SAMPLING ACTIVITIES

On October 31, 2024, Ensolum personnel were at the Site to oversee delineation activities. Four delineation soil samples (SS01 through SS04) were collected around the lined containment from a depth of approximately 0.5 feet bgs to assess the lateral extent of the release. Borehole, BH01, was advanced via hand auger to a terminal depth of 2-foot bgs in the location of the tear in the liner. The delineation soil samples were field screened for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID) and chloride utilizing Hach® chloride QuanTab® test strips. Field screening results and observations of the soil samples from the borehole were logged on a lithologic/soil sampling log, which is included in Appendix C. The delineation soil sample locations were mapped utilizing a handheld Global Positioning System (GPS) unit and are depicted on Figure 2. Photographic documentation is included in Appendix B.

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 contaminants of concern (COCs): BTEX following United States Environmental Protection Agency (EPA) Method 8021B; TPH-GRO, TPH-DRO, and TPH-oil range organics (ORO) following EPA Method 8015M/D; and chloride following Standard Method SM4500.

XTO Energy, Inc.
Closure Request
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LABORATORY ANALYTICAL RESULTS

Laboratory analytical results for delineation soil samples SS01 through SS04 indicated all COCs were in compliance with Site Closure Criteria, confirming the release remained within the lined containment. Delineation soil samples from borehole BH01 indicated all COCs were in compliance with Site Closure Criteria. Laboratory analytical results are summarized in Table 1 and the laboratory analytical reports are included in Appendix D.

CLOSURE REQUEST

Liner integrity inspection and delineation activities were conducted at the Site to address the September 29, 2024, release of produced water. Laboratory analytical results for the delineation soil samples, collected in the liner tear, indicated that all COC concentrations were compliant with the Site Closure Criteria. Based on the soil sample analytical results, no impacted soil was identified, and no further remediation was required. XTO has patched the tear in the liner following completion of delineation activities.

Delineation of potential impacts at this Site determined no soil that exceeded Site Closure Criteria was located below the lined containment. Depth to groundwater has been estimated to be greater than 100 feet bgs and no other sensitive receptors were identified near the Site. XTO believes these remedial actions are protective of human health, the environment, and groundwater. As such, XTO respectfully requests closure for Incident Number nAPP2426427757.

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
Project Engineer



Tacoma Morrissey
Associate Principal

cc: Colton Brown, XTO
Kaylan Dirkx, XTO
BLM

Appendices:

Figure 1	Site Receptor Map
Figure 2	Site Map
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



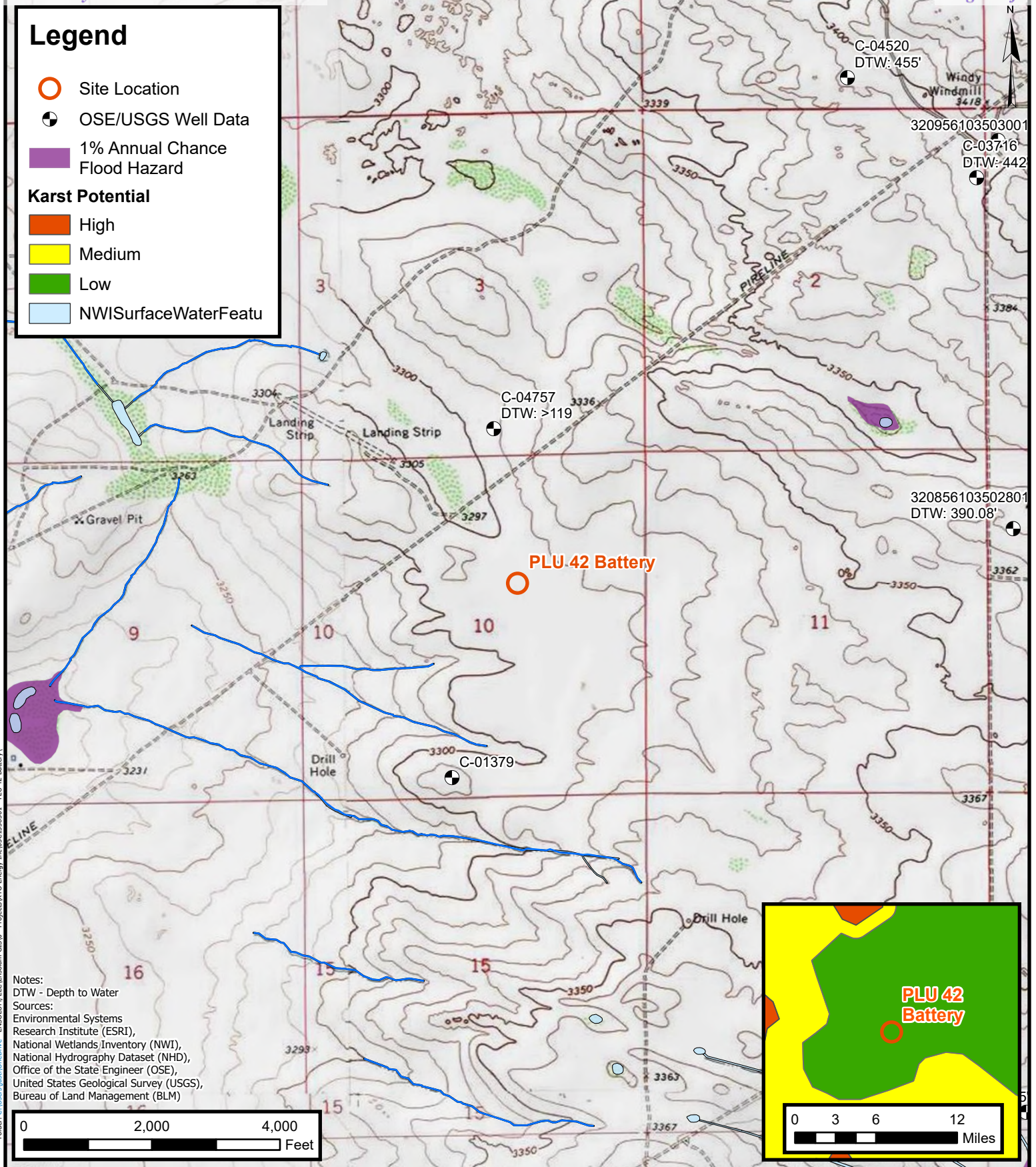
FIGURES

Legend

- Site Location
- OSE/USGS Well Data
- 1% Annual Chance Flood Hazard

Karst Potential

- High
- Medium
- Low
- NWISurfaceWaterFeatu



Site Receptor Map

XTO Energy Inc.
PLU 42 Battery
Incident Number: NAPP2426427757
Unit G, Sec 10, T25S, R30E
Eddy County, New Mexico

FIGURE

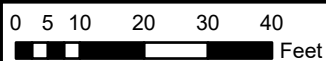
1

Legend

- Delineation Soil Sample in Compliance with Closure Criteria
- Delineation Soil Sample with Concentrations Previously Exceeding Closure Criteria
- Liner Containment Area



Notes:
Sample ID @ Depth Below Ground Surface.



Sources: Environmental Systems Research Institute (ESRI)



Delineation Soil Sample Locations

XTO Energy Inc.
PLU 42 Battery
Incident Number: NAPP2426427757
Unit G, Sec 10, T25S, R30E
Eddy County, New Mexico

FIGURE
2



TABLES



TABLE 1
SOIL SAMPLE ANALYTICAL RESULTS
PLU 42 Battery
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)
NMOCD Table I Closure Criteria (NMAC 19.15.29)			10	50	NE	NE	NE	1,000	2,500	20,000
Assessment Soil Samples										
SS01	10/31/2024	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	96.0
SS02	10/31/2024	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	64.0
SS03	10/31/2024	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	32.0
SS04	10/31/2024	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	320
Delineation Soil Samples										
BH01	10/31/2024	0.5	<0.050	<0.300	<10.0	57.4	23.8	57.4	81.2	3,280
BH01A	10/31/2024	1	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	2,000
BH01B	10/31/2024	2	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	80.0

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



APPENDIX A

Referenced Well Records

								Sample Name: C-4757 (BH01)		Date: 8/2/2023	
								Site Name: PLU CVX JV BS #016H			
								Incident Number: NAB1519556419			
								Job Number: 03C1558238			
LITHOLOGIC / SOIL SAMPLING LOG								Logged By: MR		Method: Air Rotary	
Coordinates: 32.152842, -103.866772								Hole Diameter: NA		Total Depth: 119' bgs	
Comments: No field screenings.											
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions			
						0	CCHE	0'-20' CALICHE GRAVEL, light brown/white, coarse grained, poorly sorted with sub-angular to sub-rounded grains, dry.			
						10					
						20	SP	20'-70' SAND with trace caliche, medium brown, medium grained with small grained caliche, poorly sorted, sub-rounded.			
						30		Injected water and foaming agent @ 25'.			
						40					
						50					
						60					
						70	GM	70'-90' GRAVEL conglomerate with sand, small gravel w medium grained sand, grains include quartzite and chert, poorly sorted, sub-angular grains, ~30% sand.			
						80		20% sand.			
						90	SP	90'-115' SAND, medium brown/orange, medium grained, poorly sorted.			
						100					
						110					
							SP-SM	115' SAND with silt, red, medium to fine grained, poorly sorted.			
						120					
						TD		Total Depth @ 119' bgs.			



APPENDIX B

Photographic Log

**Photographic Log**

XTO Energy, Inc.

PLU 42 Battery

nAPP2426427757



Photograph: 1 Date: 10/17/2024
Description: Liner inspection activities
View: West



Photograph: 2 Date: 10/17/2024
Description: Liner inspection activities
View: West



Photograph: 3 Date: 10/31/2024
Description: Delineation activities
View: North


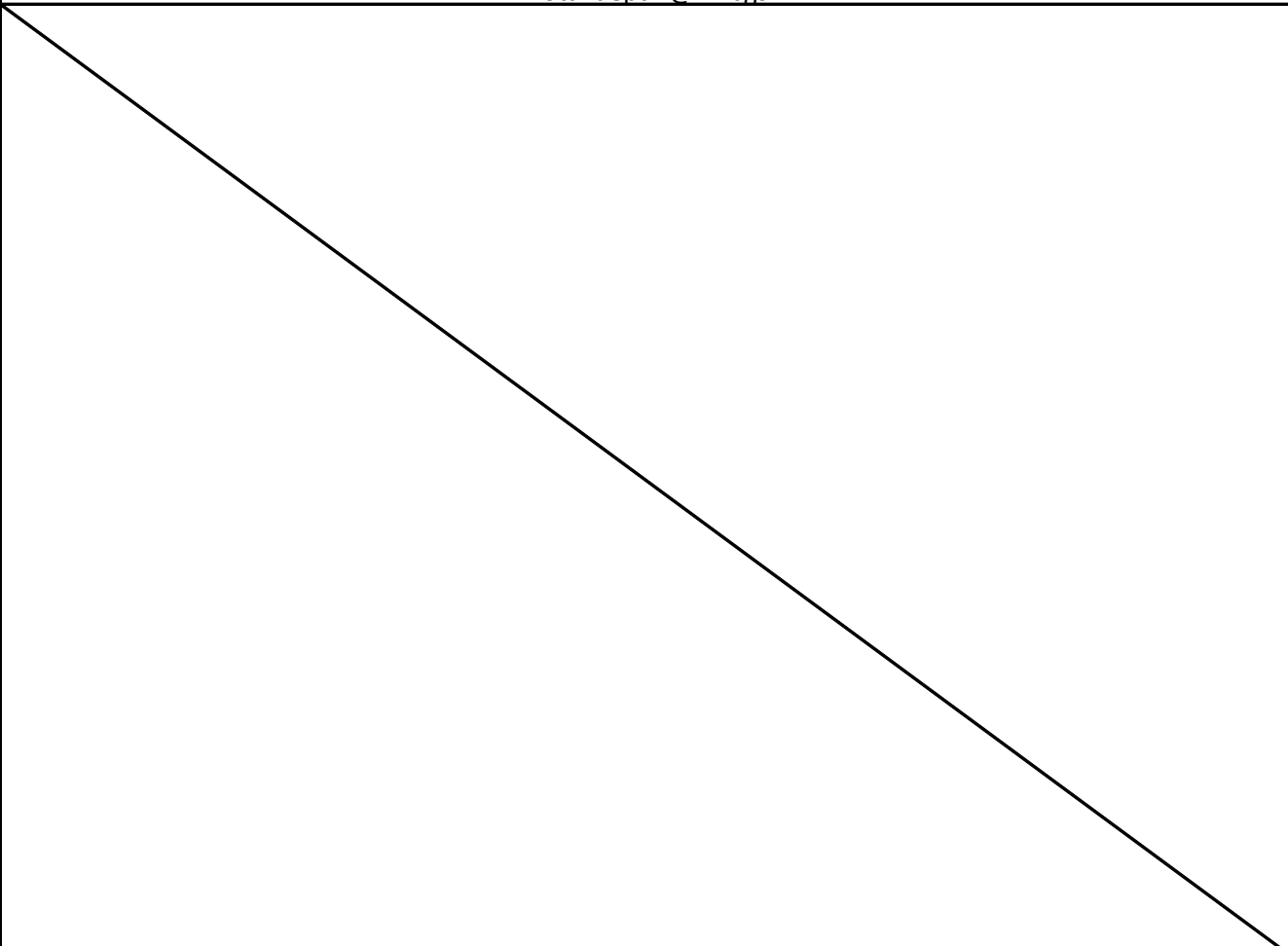


Photograph: 4 Date: 12/10/2024
Description: Patched liner tear
View: South



APPENDIX C

Lithologic Soil Sampling Logs

								Sample Name: BH01		Date: 10/31/2024	
								Site Name: PLU 42 Battery			
								Incident Number: nAPP2426427757			
								Job Number: 03C1558561			
LITHOLOGIC / SOIL SAMPLING LOG								Logged By: Jesse Dorman		Method: Hand auger	
Coordinates: 32.146759, -103.867288								Hole Diameter: 3"		Total Depth: 2'	
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. A 40% correction factor is included.											
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions			
D	4,469	0.0	N	BH01	0.5	0	CCHE	CALICHE, tan, well-graded, abundant rocks. Staining, no odor.			
D	2,240	0.0	N	BH01A	1	1	SP	SAND, redish/brown, very fine, poorly-graded. Staining, no odor.			
D	<162	0.0	N	BH01B	2	2	CCHE	CALICHE, tan, with silt. No stain, no odor.			
Total depth @ 2' bgs.											
											



APPENDIX D

Laboratory Analytical Reports & Chain of Custody Documentation



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

November 05, 2024

TRACY HILLARD

ENSOLUM

3122 NATIONAL PARKS HWY

CARLSBAD, NM 88220

RE: PLU 42 BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 11/01/24 12:00.

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.

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,

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

ENSOLUM
TRACY HILLARD
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220
Fax To:

Received: 11/01/2024
Reported: 11/05/2024
Project Name: PLU 42 BATTERY
Project Number: 03C1558561
Project Location: XTO 32.14690-103.86666

Sampling Date: 10/31/2024
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: BH 01 .5' (H246678-01)

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	11/02/2024	ND	2.05	103	2.00	1.09	
Toluene*	<0.050	0.050	11/02/2024	ND	2.18	109	2.00	5.34	
Ethylbenzene*	<0.050	0.050	11/02/2024	ND	2.27	114	2.00	7.31	
Total Xylenes*	<0.150	0.150	11/02/2024	ND	6.68	111	6.00	6.78	
Total BTEX	<0.300	0.300	11/02/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 103 % 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	3280	16.0	11/03/2024	ND	416	104	400	3.77	

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	11/02/2024	ND	212	106	200	3.53	
DRO >C10-C28*	57.4	10.0	11/02/2024	ND	228	114	200	1.45	
EXT DRO >C28-C36	23.8	10.0	11/02/2024	ND					

Surrogate: 1-Chlorooctane 117 % 48.2-134

Surrogate: 1-Chlorooctadecane 126 % 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
TRACY HILLARD
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220
Fax To:

Received: 11/01/2024
Reported: 11/05/2024
Project Name: PLU 42 BATTERY
Project Number: 03C1558561
Project Location: XTO 32.14690-103.86666

Sampling Date: 10/31/2024
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: BH 01A 1' (H246678-02)

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	11/02/2024	ND	2.05	103	2.00	1.09	
Toluene*	<0.050	0.050	11/02/2024	ND	2.18	109	2.00	5.34	
Ethylbenzene*	<0.050	0.050	11/02/2024	ND	2.27	114	2.00	7.31	
Total Xylenes*	<0.150	0.150	11/02/2024	ND	6.68	111	6.00	6.78	
Total BTEx	<0.300	0.300	11/02/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 105 % 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	2000	16.0	11/03/2024	ND	416	104	400	3.77		

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	11/02/2024	ND	212	106	200	3.53	
DRO >C10-C28*	<10.0	10.0	11/02/2024	ND	228	114	200	1.45	
EXT DRO >C28-C36	<10.0	10.0	11/02/2024	ND					

Surrogate: 1-Chlorooctane 121 % 48.2-134

Surrogate: 1-Chlorooctadecane 128 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

ENSOLUM
TRACY HILLARD
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220
Fax To:

Received: 11/01/2024
Reported: 11/05/2024
Project Name: PLU 42 BATTERY
Project Number: 03C1558561
Project Location: XTO 32.14690-103.86666

Sampling Date: 10/31/2024
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: BH 01B 2' (H246678-03)

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	11/02/2024	ND	2.05	103	2.00	1.09		
Toluene*	<0.050	0.050	11/02/2024	ND	2.18	109	2.00	5.34		
Ethylbenzene*	<0.050	0.050	11/02/2024	ND	2.27	114	2.00	7.31		
Total Xylenes*	<0.150	0.150	11/02/2024	ND	6.68	111	6.00	6.78		
Total BTEX	<0.300	0.300	11/02/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 100 % 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	11/03/2024	ND	416	104	400	3.77		

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	11/02/2024	ND	212	106	200	3.53	
DRO >C10-C28*	<10.0	10.0	11/02/2024	ND	228	114	200	1.45	
EXT DRO >C28-C36	<10.0	10.0	11/02/2024	ND					

Surrogate: 1-Chlorooctane 124 % 48.2-134

Surrogate: 1-Chlorooctadecane 131 % 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
TRACY HILLARD
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220
Fax To:

Received: 11/01/2024
Reported: 11/05/2024
Project Name: PLU 42 BATTERY
Project Number: 03C1558561
Project Location: XTO 32.14690-103.86666

Sampling Date: 10/31/2024
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: SS 01 .5' (H246678-04)

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	11/02/2024	ND	2.05	103	2.00	1.09		
Toluene*	<0.050	0.050	11/02/2024	ND	2.18	109	2.00	5.34		
Ethylbenzene*	<0.050	0.050	11/02/2024	ND	2.27	114	2.00	7.31		
Total Xylenes*	<0.150	0.150	11/02/2024	ND	6.68	111	6.00	6.78		
Total BTEX	<0.300	0.300	11/02/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 104 % 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	96.0	16.0	11/03/2024	ND	416	104	400	3.77		

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	11/02/2024	ND	212	106	200	3.53	
DRO >C10-C28*	<10.0	10.0	11/02/2024	ND	228	114	200	1.45	
EXT DRO >C28-C36	<10.0	10.0	11/02/2024	ND					

Surrogate: 1-Chlorooctane 121 % 48.2-134

Surrogate: 1-Chlorooctadecane 126 % 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
TRACY HILLARD
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220
Fax To:

Received: 11/01/2024
Reported: 11/05/2024
Project Name: PLU 42 BATTERY
Project Number: 03C1558561
Project Location: XTO 32.14690-103.86666

Sampling Date: 10/31/2024
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: SS 02 .5' (H246678-05)

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	11/02/2024	ND	2.05	103	2.00	1.09		
Toluene*	<0.050	0.050	11/02/2024	ND	2.18	109	2.00	5.34		
Ethylbenzene*	<0.050	0.050	11/02/2024	ND	2.27	114	2.00	7.31		
Total Xylenes*	<0.150	0.150	11/02/2024	ND	6.68	111	6.00	6.78		
Total BTEX	<0.300	0.300	11/02/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 99.4 % 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	64.0	16.0	11/03/2024	ND	416	104	400	3.77		

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	11/02/2024	ND	212	106	200	3.53	
DRO >C10-C28*	<10.0	10.0	11/02/2024	ND	228	114	200	1.45	
EXT DRO >C28-C36	<10.0	10.0	11/02/2024	ND					

Surrogate: 1-Chlorooctane 120 % 48.2-134

Surrogate: 1-Chlorooctadecane 125 % 49.1-148

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Analytical Results For:

ENSOLUM
TRACY HILLARD
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220
Fax To:

Received: 11/01/2024
Reported: 11/05/2024
Project Name: PLU 42 BATTERY
Project Number: 03C1558561
Project Location: XTO 32.14690-103.86666

Sampling Date: 10/31/2024
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: SS 03 .5' (H246678-06)

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	11/02/2024	ND	2.05	103	2.00	1.09		
Toluene*	<0.050	0.050	11/02/2024	ND	2.18	109	2.00	5.34		
Ethylbenzene*	<0.050	0.050	11/02/2024	ND	2.27	114	2.00	7.31		
Total Xylenes*	<0.150	0.150	11/02/2024	ND	6.68	111	6.00	6.78		
Total BTEX	<0.300	0.300	11/02/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 104 % 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	11/03/2024	ND	416	104	400	3.77		

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	11/02/2024	ND	212	106	200	3.53	
DRO >C10-C28*	<10.0	10.0	11/02/2024	ND	228	114	200	1.45	
EXT DRO >C28-C36	<10.0	10.0	11/02/2024	ND					

Surrogate: 1-Chlorooctane 112 % 48.2-134

Surrogate: 1-Chlorooctadecane 115 % 49.1-148

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Analytical Results For:

ENSOLUM
TRACY HILLARD
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220
Fax To:

Received: 11/01/2024
Reported: 11/05/2024
Project Name: PLU 42 BATTERY
Project Number: 03C1558561
Project Location: XTO 32.14690-103.86666

Sampling Date: 10/31/2024
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: SS 04 .5' (H246678-07)

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	11/02/2024	ND	2.05	103	2.00	1.09		
Toluene*	<0.050	0.050	11/02/2024	ND	2.18	109	2.00	5.34		
Ethylbenzene*	<0.050	0.050	11/02/2024	ND	2.27	114	2.00	7.31		
Total Xylenes*	<0.150	0.150	11/02/2024	ND	6.68	111	6.00	6.78		
Total BTEX	<0.300	0.300	11/02/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 99.6 % 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	320	16.0	11/03/2024	ND	416	104	400	3.77		

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	11/02/2024	ND	212	106	200	3.53	
DRO >C10-C28*	<10.0	10.0	11/02/2024	ND	228	114	200	1.45	
EXT DRO >C28-C36	<10.0	10.0	11/02/2024	ND					

Surrogate: 1-Chlorooctane 117 % 48.2-134

Surrogate: 1-Chlorooctadecane 120 % 49.1-148

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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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A handwritten signature in black ink, appearing to read "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]

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Relinquished By: 		Date: 11-1-24	Received By: 	Verbal Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Add'l Phone #:
		Time: 1200		All Results are emailed. Please provide Email address:
Relinquished By:		Date:	Received By:	BBeilll@ensulum.com TMorrissey@ensulum.com kthomason@ensulum.com
		Time:		REMARKS: costcenter; Pending Incident ID: nAPP2426427757
Delivered By: (Circle One)	Observed Temp. °C 5.7	Sample Condition Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/>	CHECKED BY: (Initials) 	Turnaround Time: #140 Standard Rush <input checked="" type="checkbox"/> Bacteria (only) Sample Condition
Sampler - UPS - Bus - Other:	Corrected Temp. °C 5.1	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Thermometer ID 1143 Correction Factor -0.5°C Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Cool Intact Observed Temp. °C
				Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Corrected Temp. °C

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

QUESTIONS

Action 413111

QUESTIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 413111
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2426427757
Incident Name	NAPP2426427757 POKER LAKE UNIT 42 BATT @ 0
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2126357762] POKER LAKE UNIT 42 BATT

Location of Release Source	
Please answer all the questions in this group.	
Site Name	POKER LAKE UNIT 42 BATT
Date Release Discovered	09/19/2024
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: Normal Operations Pump Produced Water Released: 10 BBL Recovered: 10 BBL Lost: 0 BBL.
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	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)	Pump seal leaking

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QUESTIONS, Page 2

Action 413111

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 413111
	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)	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	<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: 12/17/2024
--	--

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QUESTIONS, Page 3

Action 413111

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 413111
	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 1 and 5 (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	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between ½ and 1 (mi.)
Any other fresh water well or spring	Between ½ and 1 (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 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	No

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

Chloride (EPA 300.0 or SM4500 Cl B)	3280
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	81.2
GRO+DRO (EPA SW-846 Method 8015M)	57.4
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	09/19/2024
On what date will (or did) the final sampling or liner inspection occur	10/31/2024
On what date will (or was) the remediation complete(d)	10/31/2024
What is the estimated surface area (in square feet) that will be reclaimed	4375
What is the estimated volume (in cubic yards) that will be reclaimed	0
What is the estimated surface area (in square feet) that will be remediated	4375
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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QUESTIONS, Page 4

Action 413111

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 413111
	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:	
(Select all answers below that apply.)	
(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc.)	No
(Ex Situ) Excavation and on-site 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)	Yes
Other Non-listed Remedial Process. Please specify	No impacted soil identified
<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: 12/17/2024
<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 5

Action 413111

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 413111
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

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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Energy, Minerals and Natural Resources
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QUESTIONS, Page 6

Action 413111

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 413111
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	395702
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	10/31/2024
What was the (estimated) number of samples that were to be gathered	10
What was the sampling surface area in square feet	200

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	4375
What was the total volume (cubic yards) remediated	0
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	4375
What was the total volume (in cubic yards) reclaimed	0
Summarize any additional remediation activities not included by answers (above)	Liner integrity inspection and delineation activities were conducted at the Site to address the September 29, 2024, release of produced water. Laboratory analytical results for the delineation soil samples, collected in the liner tear, indicated that all COC concentrations were compliant with the Site Closure Criteria. Based on the soil sample analytical results, no impacted soil was identified, and no further remediation was required. XTO has patched the tear in the liner following completion of delineation activities.
<i>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>	
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: 12/17/2024

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS, Page 7

Action 413111

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 413111
	Action Type: [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 413111

CONDITIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 413111
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
nvez	Remediation has met 19.15.29 NMAC requirements. Soil impacts exceeding the reclamation standards have been left in place and are required to meet 19.15.29.13D (1) NMAC once the site is no longer reasonably needed for production or subsequent drilling ops.	3/18/2025