



April 20, 2026

New Mexico Oil Conservation Division

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

**Re: Closure Request
PLU 158
Incident Number nRM2028042882
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 confirmation soil sampling activities at the PLU 158 (Site). The purpose of the Site assessment and soil sampling activities was to identify the location of a lease automatic custody transfer (LACT) unit pump, which was the location of a mechanical fire in September 2020, and determine the presence or absence of impacted soil. Based on a review of original documents, field observations, historical satellite imagery, photographic evidence and soil sample analytical results, XTO is submitting this *Closure Request*, describing the remedial activities that have occurred at the Site and requesting no further action for Incident Number nRM2028042882.

INCIDENT BACKGROUND

The Site is located in Unit A, Section 07, Township 24 South, Range 30 East, in Eddy County, New Mexico (32.23733°, -103.91408°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM).

On September 22, 2020, a fire occurred on the electric motor of a LACT unit pump. The onsite XTO lease operator immediately shut off power to the LACT unit and used an extinguisher to put out the fire. No fluids were released in association with the mechanical fire. Though no fluids were released, XTO reported the event to the New Mexico Oil Conservation Division (NMOCD) via email on September 23, 2020, and submitted an Initial/Final C-141 Application (C-141) on October 6, 2020. The incident was assigned Incident Number nRM2028042882. Since no fluids were released from the fire, XTO simultaneously requested closure of the incident in the "Cause of Release" section of the C-141. The C-141 was accepted by the NMOCD but the incident status on the NMOCD web portal indicated "*Remediation Closure Report Received, Pending OCD Review*". However, at the time of the submittal, additional documentation for these types of Incidents- mechanical fires with no fluids released- did not typically require additional documentation, such as photos or site maps.

On September 30, 2025, XTO requested cancellation of the incident via email to the NMOCD because documentation on the OCD portal, via acceptance of the C-141, which requested closure of the incident, potentially indicated approval of the C-141 and *Closure Request*.

XTO Energy, Inc
PLU 158
Closure Request

On November 13, 2025, NMOCD provided clarification and rejected the cancellation request with the following response:

“Cancellation request denied. If there is an existing closure report related to the fire incident, please submit. If no closure report exists, a work plan and/or closure report will be required to be submitted for this incident.”

Based on NMOCD’s denial response, additional activities to develop a *Closure Request* were warranted.

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. Potential Site receptors are identified on Figure 1.

Depth to groundwater at the Site is estimated to be greater than 100 feet below ground surface (bgs) based on a soil boring drilled for determination of regional groundwater depth. On May 14, 2021, a New Mexico Office of the State Engineer (NMOSE) soil boring C-04526 was drilled 0.56 miles northwest of the Site. The boring was drilled to a total depth of 105 feet bgs. The borehole was properly abandoned with drill cuttings and hydrated bentonite chips. The well log is included in Appendix A.

The closest continuously flowing or significant watercourse to the Site is a seasonal dry wash, located approximately 3,692 feet southeast 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 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, and NMOCD preference of groundwater data within 0.5 miles of the Site, 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

SITE ASSESSMENT ACTIVITIES

On December 18, 2025, Ensolum personnel visited the Site to evaluate the incident based on information provided on the C-141 and visual observations. The LACT unit was identified utilizing the GPS coordinates provided on the “Location of Release Source” section of the C-141 and general on-site observations. The LACT unit identified during the site assessment was located in the vicinity of the reported GPS coordinates and appeared to be older in age, indicating that it likely existed at the time of the 2020 Incident.

Photographs of the LACT unit and the surrounding area were collected and are presented in a Photographic Log, provided in Appendix B. No surficial staining was observed around the LACT unit, further supporting that fluids were not released as a result of the 2020 Incident.

XTO Energy, Inc
PLU 158
Closure Request

Furthermore, satellite imagery was used to help identify the location of the LACT unit as well as review any potential staining observed near the LACT unit after the Incident occurred. Satellite imagery from 2019, before the fire occurred, is presented on Figure 1. Satellite imagery from 2022, after the fire occurred, is presented on Figure 2. The satellite imagery presented in Figure 1 and Figure 2 confirms the LACT unit hasn't moved since the time of the Incident and, imagery presented in Figure 2 indicates that there was no observed staining in the vicinity of the LACT unit following the fire.

VARIANCE REQUEST AND CONFIRMATION SOIL SAMPLING

On March 10, 2026, XTO submitted a soil sampling variance to the NMOCD requesting to use discrete soil sampling for confirmation soil samples. The request proposed to collect one discrete soil sample at 0.5 feet bgs, immediately adjacent to the LACT unit pump, where the fire occurred. The variance was approved by NMOCD on the same day the request was submitted. The email correspondence regarding the variance request is provided in Appendix C

On March 18, 2026, Ensolum returned to the Site to complete confirmation soil sampling as described in the approved variance request. One discrete soil sample (CS01) was collected immediately adjacent to the LACT unit pump at a depth of 0.5 feet bgs. The confirmation soil sample was field screened for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID) and chloride utilizing Hach® chloride QuanTab® test strips. The LACT unit location and the confirmation soil sample were mapped utilizing a handheld Global Positioning System (GPS) unit and are depicted on Figure 4. Photographic documentation was collected from the sampling event and is included in Appendix B.

The confirmation soil sample was placed directly into a pre-cleaned glass jar, labeled with the location, date, time, sampler name, method of analysis, and immediately placed on ice. The soil sample was 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-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 SM4500.

Laboratory analytical results for CS01 indicated all COC concentrations were in compliance with the Closure Criteria standards, confirming no fluids were released as a result of the fire, and no impacted soil exists beneath the LACT unit. Laboratory analytical results are summarized in Table 1, and the complete laboratory analytical report is included as Appendix D.

CLOSURE REQUEST

Site assessment and confirmation soil sampling activities were completed to assess the September 2020 fire incident that occurred at the Site. The site assessment assisted in identifying the location of the fire, the LACT unit and LACT unit pump, which was also in the vicinity of GPS coordinates provided on the C-141. Confirmation soil sample CS01 collected immediately adjacent to the LACT unit pump indicated analytical results were compliant with Site Closure Criteria. Satellite imagery provided in Figure 2 and Figure 3 presents historical imagery from before and after the incident occurred, showing the absence of surficial staining near the LACT unit, and that the LACT unit has been in the same location since 2019 (before the fire occurred), which confirms the correct LACT unit was identified during site assessment activities.

Based on the remedial activities completed, laboratory analytical results, and information provided on the C-141, no fluids were released as a result of the LACT unit pump fire. Depth to groundwater has been estimated to be greater than 100 feet bgs, based on data just beyond the NMOCD preference of 0.5 miles from the Site, and no other potential Site receptors were identified near the Site. XTO believes

XTO Energy, Inc
PLU 158
Closure Request

these remedial actions are protective of human health, the environment, and groundwater. As such, XTO respectfully requests closure for Incident Number nRM2028042882.

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

Sincerely,
Ensolum, LLC



Benjamin J. Belill
Senior Geologist



Tacoma Morrissey, P.G. (licensed in TX)
Associate Principal

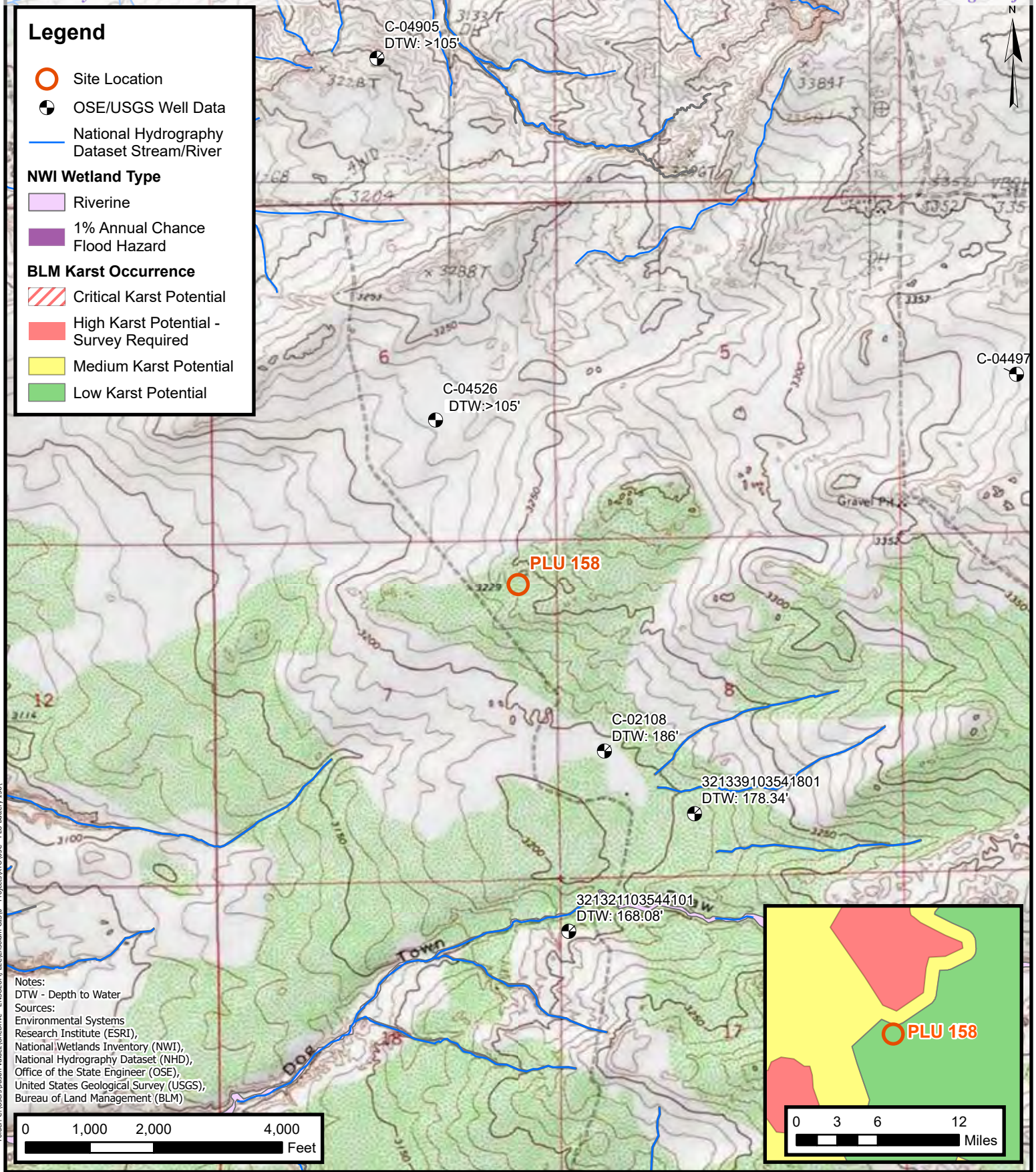
cc: Robert Woodall, XTO
Richard Kotzur, XTO
BLM

Appendices:

- Figure 1 Site Receptor Map
- Figure 2 2019 Satellite Imagery – Before Incident Occurred
- Figure 3 2022 Satellite Imagery – After Incident Occurred
- Figure 4 Confirmation Soil Sample Location
- Table 1 Soil Sample Analytical Results
- Appendix A Referenced Well Records
- Appendix B Photographic Log
- Appendix C NMOCD Correspondence
- Appendix D Laboratory Analytical Reports & Chain-of-Custody Documentation



FIGURES



Folder: C:\Users\Justin.Velazquez\OneDrive - ENSOLUM, LLC\Ensolium GIS\0 - Projects\XTO\03C - PLU Battery 158

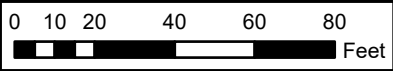


Site Receptor Map
 XTO Energy, Inc.
 PLU 158
 Incident Number: nRM2028042882
 Unit A, Section 07, T 24S, R 30E
 Eddy County, New Mexico

FIGURE
1

Legend

★ LACT Unit



Sources: Environmental Systems Research Institute (ESRI)



2019 Satellite Imagery- Before Incident Occurred

XTO Energy, Inc
PLU 158
Incident Number: nRM2028042882
Unit A, Section 07, T 24S, R 30E
Eddy County, New Mexico

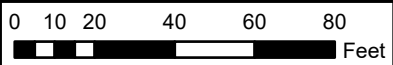
**FIGURE
2**

Legend

★ LACT Unit



Folder: C:\Users\Aveer\Hqar\OneDrive - ENSOLUM, LLC\Ensolum GIS\0 - Projects\XTO Energy, Inc\0361589993 - PLU 158



Sources: Environmental Systems Research Institute (ESRI)

2022 Satellite Imagery- After Incident Occurred



XTO Energy, Inc
PLU 158
Incident Number: nRM2028042882
Unit A, Section 07, T 24S, R 30E
Eddy County, New Mexico

FIGURE

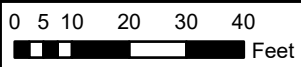
3

Legend

- Confirmation Soil Sample in Compliance with Closure Criteria
- ★ LACT Unit Location



Notes:
Sample ID @ Depth Below Ground Surface.



Sources: Environmental Systems Research Institute (ESRI)



Confirmation Soil Sample Location

XTO Energy, Inc
 PLU 158
 Incident Number: nRM2028042882
 Unit A, Section 07, T 24S, R 30E
 Eddy County, New Mexico

FIGURE

4



TABLE

**TABLE 1
SOIL SAMPLE ANALYTICAL RESULTS
PLU 158
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	NE	100	600
Confirmation Soil Sample										
CS01	03/18/2026	0.5	<0.050	<0.300	<10.0	61.0	16.1	61.0	77.1	64.0

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

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



WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

www.ose.state.nm.us

1. GENERAL AND WELL LOCATION	OSE POD NO. (WELL NO.) POD1 (MW-1)		WELL TAG ID NO. n/a		OSE FILE NO(S). C-4526			
	WELL OWNER NAME(S) XTO Energy (Kyle Littrell)				PHONE (OPTIONAL)			
	WELL OWNER MAILING ADDRESS 6401 Holiday Hill Dr.				CITY Midland	STATE TX	ZIP 79707	
	WELL LOCATION (FROM GPS)	LATITUDE	DEGREES 32°	MINUTES 14'	SECONDS 42.15"	* ACCURACY REQUIRED: ONE TENTH OF A SECOND		
		LONGITUDE	103°	55'	6.20"	* DATUM REQUIRED: WGS 84		
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS - PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE NW NE Sec. 06 T24S R30E								
2. DRILLING & CASING INFORMATION	LICENSE NO. 1249		NAME OF LICENSED DRILLER Jackie D. Atkins			NAME OF WELL DRILLING COMPANY Atkins Engineering Associates, Inc.		
	DRILLING STARTED 05/14/2021		DRILLING ENDED 05/14/2021	DEPTH OF COMPLETED WELL (FT) temporary well material		BORE HOLE DEPTH (FT) 105	DEPTH WATER FIRST ENCOUNTERED (FT) n/a	
	COMPLETED WELL IS: <input type="checkbox"/> ARTESIAN <input checked="" type="checkbox"/> DRY HOLE <input type="checkbox"/> SHALLOW (UNCONFINED)					STATIC WATER LEVEL IN COMPLETED WELL (FT) n/a		
	DRILLING FLUID: <input checked="" type="checkbox"/> AIR <input type="checkbox"/> MUD ADDITIVES - SPECIFY:							
	DRILLING METHOD: <input type="checkbox"/> ROTARY <input type="checkbox"/> HAMMER <input type="checkbox"/> CABLE TOOL <input checked="" type="checkbox"/> OTHER - SPECIFY: Hollow Stem Auger							
	DEPTH (feet bgl)		BORE HOLE DIAM (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)	CASING CONNECTION TYPE (add coupling diameter)	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)	SLOT SIZE (inches)
	FROM	TO						
	0	105	±6.5	Boring- HSA	--	--	--	--
3. ANNULAR MATERIAL	DEPTH (feet bgl)		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL	AMOUNT (cubic feet)	METHOD OF PLACEMENT		
	FROM	TO						

FOR OSE INTERNAL USE				WR-20 WELL RECORD & LOG (Version 06/30/17)			
FILE NO.	C-4526	POD NO.	1	TRN NO.	692109		
LOCATION	Expl	24S.30E.6.414	WELL TAG ID NO.	0210010200	PAGE 1 OF 2		



APPENDIX B

Photographic Log



Photographic Log

XTO Energy, Inc

PLU 158

nRM2028042882

<p><u>Photograph</u> 1</p>	<p><u>Date</u> 12/18/2025</p>	
<p><u>Description</u> PLU 158 facility sign</p>		
<p><u>View</u> Direct</p>		
<p><u>Photograph</u> 2</p>	<p><u>Date</u> 12/18/2025</p>	
<p><u>Description</u> LACT Unit that caused fire incident</p>		
<p><u>View</u> South</p>		



ENSOLUM

Photographic Log

XTO Energy, Inc

PLU 158

nRM2028042882

<p><u>Photograph</u> 3</p>	<p><u>Date</u> 12/18/2025</p>	
<p><u>Description</u> Posterior view of LACT Unit</p>		
<p><u>View</u> East</p>		
<p><u>Photograph</u> 4</p>	<p><u>Date</u> 3/18/2026</p>	
<p><u>Description</u> CS01 location collected adjacent to the LACT unit pump</p>		
<p><u>View</u> West</p>		



APPENDIX C

NMOCD Correspondence

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural
Resources Department

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

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

Incident ID	NRM2028042882
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party XTO Energy	OGRID 5380
Contact Name Kyle Littrell	Contact Telephone 432-221-7331
Contact email Kyle_Littrell@xtoenergy.com	Incident # (assigned by OCD)
Contact mailing address 522 W. Mermod, Carlsbad, NM 88220	

Location of Release Source

Latitude 32.23733 Longitude -103.91408
(NAD 83 in decimal degrees to 5 decimal places)

Site Name PLU 158	Site Type Tank Battery
Date Release Discovered 9/22/2020	API# (if applicable)

Unit Letter	Section	Township	Range	County
A	07	24S	30E	Eddy

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

Nature and Volume of Release

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

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

Cause of Release A fire occurred on the electric motor on the LACT pump. LO extinguished the fire and shut off power to the LACT. No fluids were released from this event, therefore XTO requests closure of this incident.

State of New Mexico
Oil Conservation Division

Incident ID	NRM2028042882
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? A fire occurred at facility.
----------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------

If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?
 Yes, by Kyle Littrell to 'Bratcher, Mike, EMNRD'; 'Hamlet, Robert, EMNRD'; 'Venegas, Victoria, EMNRD'; 'Griswold, Jim, EMNRD'; 'BLM_NM_CFO_Spill@blm.gov'; 'Morgan, Crisha A' on Wednesday, September 23, 2020 10:32 AM.

Initial Response


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

<input type="checkbox"/> The source of the release has been stopped. <input type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not been undertaken, explain why:
 No fluids were released from this incident.

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

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: <u>Kyle Littrell</u>	Title: <u>SH&E Supervisor</u>
Signature: <u></u>	Date: <u>10-6-20</u>
email: <u>Kyle_Littrell@xtoenergy.com</u>	Telephone: <u>432-221-7331</u>

OCD Only

Received by: Ramona Marcus Date: 10/06/2020

Incident ID	NRM2028042882
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

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

What is the shallowest depth to groundwater beneath the area affected by the release?	>100 _____ (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

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

- Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- Field data
- Data table of soil contaminant concentration data
- Depth to water determination
- Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- Boring or excavation logs
- Photographs including date and GIS information
- Topographic/Aerial maps
- Laboratory data including chain of custody


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

State of New Mexico
Oil Conservation Division

Page 4

Incident ID	v
District RP	
Facility ID	
Application ID	

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: Kyle Littrell Title: SH&E Supervisor
 Signature:  Date: 10-6-20
 email: Kyle_Littrell@xtoenergy.com Telephone: 432-221-7331

OCD Only

Received by: Ramona Marcus Date: 10/6/2020

Incident ID	NRM2028042882
District RP	
Facility ID	
Application ID	


Closure

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 (electronic submittals in .pdf format are preferred) 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.

Closure Report Attachment Checklist: *Each of the following items must be included in the closure report.*

- A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- Description of remediation activities

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.

Printed Name: Kyle Littrell Title: SH&E Supervisor
 Signature:  Date: 10-6-20
 email: Kyle_Littrell@xtoenergy.com Telephone: 432-221-7331

OCD Only

Received by: Ramona Marcus Date: 10/6/2020

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____

From: OCDOnline@state.nm.us <OCDOnline@state.nm.us>
Sent: Thursday, November 13, 2025 11:12 AM
To: Woodall, Robert D <robert.d.woodall@exxonmobil.com>
Subject: The Oil Conservation Division (OCD) has rejected the application, Application ID: 510633

To whom it may concern (c/o Robert Woodall for XTO ENERGY, INC),

The OCD has rejected the submitted *Request to Cancel the Notification of a Release (C-141C)*, for incident ID (n#) nRM2028042882, for the following reasons:

- **Cancellation request denied. If there is an existing closure report related to the fire incident, please submit. If no closure report exists, a work plan and/or closure report will be required to be submitted for this incident.**

The rejected C-141C can be found in the OCD Online: Permitting - Action Status, under the Application ID: 510633.

Please review and make the required correction(s) prior to resubmitting.

If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional C-141C.

Thank you,
Michael Buchanan
Environmental Specialist
505-490-0798
Michael.Buchanan@emnrd.nm.gov

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

Ben Belill

From: Buchanan, Michael, EMNRD <Michael.Buchanan@emnrd.nm.gov>
Sent: Tuesday, March 10, 2026 5:49 PM
To: Ben Belill
Cc: Bratcher, Michael, EMNRD; Hall, Brittany, EMNRD; Tacoma Morrissey; Woodall, Robert D; Kotzur, Richard; Kim Thomason; Tracy Hillard; Jeremy Reich
Subject: RE: [EXTERNAL] Variance Request - PLU 158 - Incident Number nRM2028042882

[**EXTERNAL EMAIL**]

Good afternoon, Mr. Belill

The request for a variance to allow for collection of one (1) discrete soil sample at 0.5’ below ground surface immediately adjacent to the LACT unit pump where the fire occurred is approved. Please include this correspondence with the next report submission.

Kind regards,


From: Ben Belill <bbelill@ensolum.com>
Sent: Tuesday, March 10, 2026 2:42 PM
To: Buchanan, Michael, EMNRD <Michael.Buchanan@emnrd.nm.gov>
Cc: Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>; Tacoma Morrissey <tmorrissey@ensolum.com>; Woodall, Robert D <robert.d.woodall@exxonmobil.com>; Kotzur, Richard <richard.kotzur@exxonmobil.com>; Kim Thomason <kthomason@ensolum.com>; Tracy Hillard <thillard@ensolum.com>; Jeremy Reich <jreich@ensolum.com>
Subject: RE: [EXTERNAL] Variance Request - PLU 158 - Incident Number nRM2028042882

Thank you, Mr. Buchanan

Based on your response to the previously requested variance, we would like to request a variance of the 5-point composite soil sampling requirement for the fire incident at the PLU 158 (Incident Number nRM2028042882). XTO proposes to collect one grab sample at 0.5 feet below ground surface (bgs) immediately adjacent to the LACT unit pump, where the fire occurred. If the discrete delineation soil sample indicates all contaminants of concern (COCs) are compliant with the Closure Criteria, XTO requests a variance to utilize the delineation data as supporting documentation for Closure. Additional documentation will be collected at the time of the sampling event including photographic documentation to observe any surficial staining in the area of the LACT unit and satellite imagery from before and after the fire incident occurred to identify any potential release in the area of the LACT unit that may have been caused by the fire. The discrete soil sample will be submitted to an approved New Mexico laboratory for analysis of the following contaminants of COCs: Benzene, toluene, ethylbenzene, and total xylenes (BTEX) following United States Environmental Protection Agency (EPA) Method 8021B; Total petroleum hydrocarbons (TPH)-gasoline range organics, TPH-diesel range organics, and TPH-oil range organics following EPA Method 8015M/D; and chloride following EPA Method 300.0 or Standard Method SM4500. If COC concentrations exceed the strictest Table 1 Closure Criteria of 19.15.29 NMAC for the discrete soil sample, additional delineation soil samples will be collected vertically and laterally to fully define identified impacts. Based on the NMOCD’s response to the previously requested variance and the proposed soil sampling activities presented above, XTO believes these activities provide equal or better protection of fresh water, public health and

the environment. Following approval of this variance request, a C-141N will be submitted via NMOCD web portal at least 48-hours prior to the proposed discrete sampling as recommended by the NMOCD.

Thank you,



Benjamin Belill
 Senior Geologist
 989-854-0852
 Ensolum, LLC
 in f t

From: Buchanan, Michael, EMNRD <Michael.Buchanan@emnrd.nm.gov>
Sent: Monday, March 9, 2026 5:56 PM
To: Ben Belill <bbelill@ensolum.com>
Cc: Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>; Tacoma Morrissey <tmorrissey@ensolum.com>; Woodall, Robert D <robert.d.woodall@exxonmobil.com>; Kotzur, Richard <richard.kotzur@exxonmobil.com>; Kim Thomason <kthomason@ensolum.com>; Tracy Hillard <thillard@ensolum.com>; Jeremy Reich <jreich@ensolum.com>
Subject: RE: [EXTERNAL] Variance Request - PLU 158 - Incident Number nRM2028042882

[**EXTERNAL EMAIL**]

Good afternoon, Mr. Belill

Given the lapse in time to submit for closure, uncertainty about the conditions of the site and fire that occurred, and the lack of documentation provided for the duration of this open incident (since 09/22/2020), the variance request at this time is denied. Photo documentation must be submitted and provided for the incident as well as at least one grab sample at 6 inches bgs where the fire occurred. A variance may be considered once the lab analytical demonstrates below the most stringent criteria for all constituents in Table 1 of 19.15.29 NMAC. Please upload all information into permitting online for the incident.

Thank you,

You don't often get email from bbelill@ensolum.com. [Learn why this is important](#)

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Good afternoon,

Ensolum, LLC (Ensolum), on behalf of XTO Energy, Inc. (XTO), is requesting a variance of the requirement of providing soil sample laboratory analytical results for a fire incident that occurred at the PLU 158 (Incident Number nRM2028042882). On September 22, 2020, a fire occurred on the electric motor of a LACT unit pump. The onsite

XTO lease operator immediately shut off power to the LACT unit and immediately extinguished the fire. No fluids were released in association with the mechanical fire. Though no fluids were released, XTO reported the event to the New Mexico Oil Conservation Division (NMOCD) via email on September 23, 2020, and submitted an Initial/Final C-141 Application (C-141) on October 6, 2020. The incident was assigned Incident Number nRM2028042882. Since no fluids were released from the fire, XTO simultaneously requested closure of the incident in the "Cause of Release" section of the C-141. The C-141 was accepted by the NMOCD but the incident status on the NMOCD web portal indicated "Remediation Closure Report Received, Pending OCD Review". However, at the time of the submittal, additional documentation for these types of Incidents- mechanical fires with no fluids released- did not typically require additional documentation, such as photos or site maps. Since there were no fluids released at the time of the fire incident, standard supporting documentation is not applicable for this Site. Therefore, XTO respectfully requests approval of a variance from providing a soil sampling diagram and laboratory analytical results. Since fluids were not released at the time of the incident, soil sampling is not needed or required and demonstrates that the variance will provide equal or better protection of fresh water, public health and the environment. If NMOCD approves the variance, a C-141N will be submitted with no soil sampling completed, so a *Closure Request* report can be submitted on the NMOCD Web Portal to document the location of the fire. The approved variance correspondence will be included in the *Closure Request*.

Thank you,



Benjamin Belill

Senior Geologist

989-854-0852

Ensolum, LLC

in f 



APPENDIX D

Laboratory Analytical Reports & Chain-of-Custody Documentation



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

March 25, 2026

BEN BELILL

ENSOLUM

3122 NATIONAL PARKS HWY

CARLSBAD, NM 88220

RE: POKER LAKE UNIT #158

Enclosed are the results of analyses for samples received by the laboratory on 03/19/26 13:50.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C25-00101. 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,

A handwritten signature in black ink that reads "Celey D. Keene".

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:	03/19/2026	Sampling Date:	03/18/2026
Reported:	03/25/2026	Sampling Type:	Soil
Project Name:	POKER LAKE UNIT #158	Sampling Condition:	Cool & Intact
Project Number:	03C1558793	Sample Received By:	Alyssa Parras
Project Location:	XTO 32.23733-103.91408		

Sample ID: CS01 0.5' (H261532-01)

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	03/20/2026	ND	2.23	112	2.00	3.02	
Toluene*	<0.050	0.050	03/20/2026	ND	2.09	105	2.00	4.81	
Ethylbenzene*	<0.050	0.050	03/20/2026	ND	1.99	99.5	2.00	6.78	
Total Xylenes*	<0.150	0.150	03/20/2026	ND	6.05	101	6.00	8.24	
Total BTEX	<0.300	0.300	03/20/2026	ND					

Surrogate: 4-Bromofluorobenzene (PID) 111 % 70.4-141

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	03/20/2026	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: JF					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/20/2026	ND	194	96.9	200	0.319	
DRO >C10-C28*	61.0	10.0	03/20/2026	ND	206	103	200	0.448	
EXT DRO >C28-C36	16.1	10.0	03/20/2026	ND					

Surrogate: 1-Chlorooctane 64.4 % 52.4-130

Surrogate: 1-Chlorooctadecane 62.7 % 39.9-141

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

Notes and Definitions

- QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
BS-3 Blank spike recovery outside of lab established statistical limits, but still within method limits. Data is not adversely affected.
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

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

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

Page 1 of 1

BILL TO

ANALYSIS REQUEST

Company Name: Ensolum, LLC	P.O. #: XTO Energy
Project Manager: Ben Bellill	Company: XTO Energy
Address: 3122 National Parks Hwy	Attn: Dale Woodall
City: Carlsbad	Address: 3104 E Green St
State: NM Zip 88220	City: Carlsbad
Phone #: 970-210-9803	State: NM Zip: 88220
Fax #: 970-210-9803	Phone #:
Project #: 03C1558793	Project Owner: XTO Energy
Project Name: Poker Lake Unit #158	Project Location: 32.23733, -103.91408
Project Location: 32.23733, -103.91408	Sample Name: Jacob Harrison

Lab I.D.	Sample I.D.	Sample Depth	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX							DATE	TIME	
					GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:			ICE / COOL
1801532	CS01	0.5	G	1			X					X	3/18/20	842

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 the client for the 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 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.

Relinquished By: *BBM* Date: *3/19/20* Time: *1:35p*
 Received By: *APPOUR* Date: _____ Time: _____

Relinquished By: _____ Date: _____ Time: _____
 Received By: _____ Date: _____ Time: _____

Delivered By: (Circle One) Observed Temp. °C *0.95* Sample Condition Cool Intact Yes No
 Corrected Temp. °C *1.02* Sample Condition Cool Intact Yes No

Turnaround Time: Standard Rush Bacteria (only) Sample Condition Cool Intact Yes No
 Thermometer ID #140 Correction Factor +0.3°C *0.1* Observed Temp. °C _____ Corrected Temp. °C _____

Verbal Result: Yes No Add'l Phone #: _____
 All Results are emailed. Please provide Email address: *richard.kotzur@ensolum.com / kthomason@ensolum.com / richard.kotzur@exxonmobil.com / jharrison@ensolum.com / bellill@ensolum.com*
 REMARKS: *TPH BTEX*

nRM2028042882 / CC: 1137581001 / GFCM: 48605000

† Cardinal cannot accept verbal changes. Please email changes to celey.keene@cardinallabsnm.com

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

Action 577299

QUESTIONS

Operator: XTO ENERGY, INC 3617 North Big Spring Street Midland, TX 79705	OGRID: 5380
	Action Number: 577299
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nRM2028042882
Incident Name	NRM2028042882 PLU 158 @ FAPP2126358341
Incident Type	Fire
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2126358341] POKER LAKE UNIT BATT 158

Location of Release Source	
<i>Please answer all the questions in this group.</i>	
Site Name	PLU 158
Date Release Discovered	09/22/2020
Surface Owner	Federal

Incident Details	
<i>Please answer all the questions in this group.</i>	
Incident Type	Fire
Did this release result in a fire or is the result of a fire	Yes
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	
<i>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.</i>	
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	Not answered.
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Cause: Fire Pump Other (Specify) Released: 0 BBL 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)	Not answered.

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 2

Action 577299

QUESTIONS (continued)

Operator: XTO ENERGY, INC 3617 North Big Spring Street Midland, TX 79705	OGRID: 5380
	Action Number: 577299
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	More info needed to determine if this will be treated as a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (2) an unauthorized release of a volume that: (a) results in a fire or is the result of a fire.
<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: Richard Kotzur Title: Senior Project Manager Email: NMEEnvNotifications@exxonmobil.com Date: 04/20/2026
----------------------------------------------------	------------------------------------------------------------------------------------------------------------------------

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 3

Action 577299

QUESTIONS (continued)

Operator: XTO ENERGY, INC 3617 North Big Spring Street Midland, TX 79705	OGRID: 5380
	Action Number: 577299
	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 ½ and 1 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 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 ½ and 1 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Between ½ and 1 (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)	64
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	77.1
GRO+DRO (EPA SW-846 Method 8015M)	61
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	12/18/2025
On what date will (or did) the final sampling or liner inspection occur	03/18/2026
On what date will (or was) the remediation complete(d)	03/18/2026
What is the estimated surface area (in square feet) that will be reclaimed	0
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	0
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.

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 4

Action 577299

QUESTIONS (continued)

Operator: XTO ENERGY, INC 3617 North Big Spring Street Midland, TX 79705	OGRID: 5380
	Action Number: 577299
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)

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.

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

Site assessment and confirmation soil sampling activities were completed to assess the September 2020 fire incident that occurred at the Site. The site assessment helped in identifying the location of the fire, the LACT unit and LACT unit pump, which was also in the vicinity of GPS coordinates provided on the C-141. Confirmation soil sample CS01 collected immediately adjacent to the LACT unit pump indicated analytical results were below Site Closure Criteria. Satellite imagery provided in Figure 2 and Figure 3 presents historical imagery from before and after the incident occurred, showing the absence of surficial staining near the LACT unit, and that the LACT unit has been stationary since 2019 (before the fire occurred), which confirms the correct LACT unit was identified during site assessment activities.

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 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: Richard Kotzur Title: Senior Project Manager Email: NMEnvNotifications@exxonmobil.com Date: 04/20/2026
----------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------

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.

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 5

Action 577299

QUESTIONS (continued)

Operator: XTO ENERGY, INC 3617 North Big Spring Street Midland, TX 79705	OGRID: 5380
	Action Number: 577299
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Deferral Requests Only	
<i>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.</i>	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

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 6

Action 577299

QUESTIONS (continued)

Operator: XTO ENERGY, INC 3617 North Big Spring Street Midland, TX 79705	OGRID: 5380
	Action Number: 577299
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	561907
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	03/18/2026
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	0
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	0
What was the total volume (in cubic yards) reclaimed	0

Summarize any additional remediation activities not included by answers (above)	Site assessment and confirmation soil sampling activities were completed to assess the September 2020 fire incident that occurred at the Site. The site assessment helped in identifying the location of the fire, the LACT unit and LACT unit pump, which was also in the vicinity of GPS coordinates provided on the C-141. Confirmation soil sample CS01 collected immediately adjacent to the LACT unit pump indicated analytical results were below Site Closure Criteria. Satellite imagery provided in Figure 2 and Figure 3 presents historical imagery from before and after the incident occurred, showing the absence of surficial staining near the LACT unit, and that the LACT unit has been stationary since 2019 (before the fire occurred), which confirms the correct LACT unit was identified during site assessment activities.
---------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

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: Richard Kotzur Title: Senior Project Manager Email: NMEnvNotifications@exxonmobil.com Date: 04/20/2026
----------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------

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 577299

QUESTIONS (continued)

Operator: XTO ENERGY, INC 3617 North Big Spring Street Midland, TX 79705	OGRID: 5380
	Action Number: 577299
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

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

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

CONDITIONS

Action 577299

CONDITIONS

Operator: XTO ENERGY, INC 3617 North Big Spring Street Midland, TX 79705	OGRID: 5380
	Action Number: 577299
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
michael.buchanan	Remediation closure is approved.	4/24/2026