



Re: [EXTERNAL] XTO - Sampling Plan - Highlander Compressor Station - nAPP2606139393

From Minnix, Sharon, EMNRD <Sharon.Minnix@emnrn.nm.gov>

Date Mon 6/8/2026 2:38 PM

To Tracy Hillard <thillard@ensolum.com>; Hall, Brittany, EMNRD <Brittany.Hall@emnrn.nm.gov>

Cc Rodgers, Scott, EMNRD <Scott.Rodgers@emnrn.nm.gov>; Enviro, OCD, EMNRD <OCD.Enviro@emnrn.nm.gov>; Tacoma Morrissey <tmorrissey@ensolum.com>; Ben Belill <bbelill@ensolum.com>; Jeremy Reich <jreich@ensolum.com>; robert.d.woodall@exxonmobil.com <robert.d.woodall@exxonmobil.com>; richard.kotzur@exxonmobil.com <richard.kotzur@exxonmobil.com>; Romero, Rosa, EMNRD <RosaM.Romero@emnrn.nm.gov>; Bratcher, Michael, EMNRD <mike.bratcher@emnrn.nm.gov>

Hi Tracy,

At this time the sampling plan and variance is approved with the following conditions:

- The responsible party must collect at surface (0ft), 1ft, 2ft, 3ft, and 4ft.
- Additional samples must be collected as described above from any wet or discolored areas.
- A C-141N must be submitted two business days prior to collecting samples per 10.15.29.12.D.1.A.
- If any impacts are found during these activities, delineation must be completed and a remediation plan must be submitted through the OCD Permitting website.
- Site photographs of the sampling points.
- The acceptance of this alternative sampling plan 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; or if the location fails to revegetate properly. In addition, OCD approval does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations. If the applicable land managing agency does not agree and requires a more stringent sampling plan, the more stringent requirements must be met regardless of OCD's approval. Include a copy of the correspondence with any other regulatory agencies in the next C-141 submittal.
- Submit a complete and accurate report through the OCD Permitting website by 8/24/2026.

Please let me know if you have any questions.

Thank you,



**New Mexico Energy Minerals and Natural Resources Department
Oil Conservation Division**

Sharon Minnix • Senior Environmental Scientist
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505.645.5282

Sharon.minnix@emnrn.nm.gov
[OCD Home - Oil Conservation](#)

Effective 05/27/2026: C-141N and C-141L Notice. This notice can be found at: [OCD - Operator Guidance - Oil Conservation](#) under "RELEASES AND REMEDIATION".

Effective 12/1/2024: OCD has updated guidance on karst potential occurrence zones. This notice can be found at: <https://www.emnrd.nm.gov/ocd/ocd-announcements-and-notifications/> under "2024 OCD ANNOUNCEMENTS AND NOTIFICATIONS".

The Digital C-141 guidance documents can be found at <https://www.emnrd.nm.gov/ocd/ocd-announcements-and-notifications/> or <https://www.emnrd.nm.gov/ocd/ocd-forms/>.

From: Tracy Hillard <thillard@ensolum.com>

Sent: Wednesday, June 3, 2026 11:29 AM

To: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>

Cc: Rodgers, Scott, EMNRD <Scott.Rodgers@emnrd.nm.gov>; Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>; Tacoma Morrissey <tmorrissey@ensolum.com>; Ben Belill <bbelill@ensolum.com>; Jeremy Reich <jreich@ensolum.com>; robert.d.woodall@exxonmobil.com <robert.d.woodall@exxonmobil.com>; richard.kotzur@exxonmobil.com <richard.kotzur@exxonmobil.com>; Romero, Rosa, EMNRD <RosaM.Romero@emnrd.nm.gov>; Minnix, Sharon, EMNRD <Sharon.Minnix@emnrd.nm.gov>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>

Subject: RE: [EXTERNAL] XTO - Sampling Plan - Highlander Compressor Station - nAPP2606139393

Ms. Hall-

Thank you for your review of the characterization of the wetland and your clarification of sampling notification guidelines. As previously stated, we do not anticipate impacts to be identified due to the lack of fluids released. See modified variance below.

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): 100 mg/kg
- Chloride: 600 mg/kg

A Site Receptor Map is included in Figure 1.

XTO is submitting this variance request to utilize delineation soil samples as confirmation soil samples in the final report. On February 25, 2026, a flare malfunction resulted in a flare fire which ignited the adjacent pasture grass and the fire spread due to high winds. No fluids were released. Eddy County Fire Department responded and extinguished the fire. Approximately 1,357,910 square feet of pasture grasses were burned by the fire. XTO submitted a Notification of Release (NOR) and an Initial C-141 Application (C-141) on March 2, 2026, to the New Mexico Oil Conservation Division (NMOCD) and NMOCD assigned Incident Number nAPP2606139393. To assess the scorched area, even though no fluids were released, XTO will collect 42 delineation soil borings (BH01 through BH42). Discrete soil samples will be collected at surface and 0.5 feet bgs to confirm the absence of impacts. In addition, XTO will collect 32 lateral delineation soil samples (SS01 through SS32) to confirm the lateral extent. The proposed delineation soil sample locations are presented on Figure 2. The soil samples will be field screened for volatile organic compounds (VOCs) and chlorides and submitted to an approved laboratory for the analysis of benzene, BTEX, TPH, and chloride.

XTO is requesting a variance from 19.15.29.12 NMAC D. (1)(c) and requests approval to utilize the above-mentioned delineation soil samples as final closure samples, in-lieu of confirmation soil samples collected every 200-square foot. Sampling notifications will be submitted at least 48 hours in advance of all delineation soil sampling that will occur in order for the delineation

soil samples to be potentially utilized as confirmation soil samples in the *Closure Request*. If any impacted soil is identified, appropriate remediation activities will be completed accordingly.

XTO is providing (1) a detailed statement: No fluids were released as a result of the flare fire. The 1,357,910 square feet of pasture that was affected was burned, not affected by fluids, as such confirmation soil sampling should not be required. In this instance we would request that the delineation soil samples- assuming analytical results are compliant with the Closure Criteria- provide sufficient documentation of absence of impacts resulting from the brush fire. Following a review of the analytical results of the delineation soil samples and assuming no impacts are identified, the area will be reseeded with the Bureau of Land Management (BLM) seed mix #2 or alternatively requested seed mix from the BLM; and (2) demonstration that the variance is equally protective of freshwater, public health, and the environment: Confirmation soil sampling in accordance with the rule would require collection of over 6,790 composite soil samples across this area, significantly increasing site traffic, soil disturbance, soil compaction, and further impact to relatively undisturbed areas, beyond the fire. Additionally, fire can be a natural and beneficial process in grassland ecosystems, often promoting nutrient cycling, reducing invasive species, and stimulating new vegetation growth. Rather than introducing additional disturbance through extensive sampling, reseeded is a typical best practice following fires and would better support natural recovery and restoration of the pasture. The proposed delineation soil sampling will adequately confirm the absence of impacts while minimizing unnecessary environmental disturbance.

XTO will initiate delineation activities within 2 weeks of approval of the variance. The delineation soil sampling is anticipated to take approximately 3 to 5 days. XTO will submit a *Remediation Work Plan* or *Closure Request* within 30 days of final receipt of the laboratory analytical data. XTO respectfully requests approval of the variance request and asks that any additional conditions to grant approval from OCD be included in the response.



Tracy Hillard

Project Engineer

575-937-3906

Ensolum, LLC

in f X

From: Hall, Brittany, EMNRD <Brittany.Hall@emnr.d.nm.gov>

Sent: Tuesday, June 2, 2026 3:58 PM

To: Tracy Hillard <thillard@ensolum.com>

Cc: Rodgers, Scott, EMNRD <Scott.Rodgers@emnr.d.nm.gov>; Enviro, OCD, EMNRD <OCD.Enviro@emnr.d.nm.gov>; Tacoma Morrissey <tmorrissey@ensolum.com>; Ben Belill <bbelill@ensolum.com>; Jeremy Reich <jreich@ensolum.com>; robert.d.woodall@exxonmobil.com; richard.kotzur@exxonmobil.com; Romero, Rosa, EMNRD <RosaM.Romero@emnr.d.nm.gov>; Minnix, Sharon, EMNRD <Sharon.Minnix@emnr.d.nm.gov>; Bratcher, Michael, EMNRD <mike.bratcher@emnr.d.nm.gov>

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[**EXTERNAL EMAIL**]

Tracy,

If XTO plans to utilize delineation samples as final/confirmation samples, a variance request must be submitted and approved by the OCD prior to the samples being collected. Variance requests must include a detailed statement explaining the need for a variance; and a detailed written demonstration that the variance will provide equal or better protection of fresh water, public health and the environment pursuant to 19.15.29.14 A. (1) and (2) NMAC>

If the variance request is approved, sampling notifications must be submitted at least two business days prior to conducting final sampling.

Thank you,
Brittany Hall • Environmental Field Compliance Supervisor
Environmental Field Compliance Group
EMNRD - Oil Conservation Division
1000 Rio Brazos Road | Aztec, NM 87410
505.517.5333 | Brittany.Hall@emnrd.nm.gov
<http://www.emnrd.nm.gov/ocd/>

Effective 12/1/2024: OCD has updated guidance on karst potential occurrence zones. This notice can be found at: <https://www.emnrd.nm.gov/ocd/ocd-announcements-and-notifications/> under "2024 OCD ANNOUNCEMENTS AND NOTIFICATIONS".

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From: Tracy Hillard <thillard@ensolum.com>
Sent: Tuesday, June 2, 2026 2:54 PM
To: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>
Cc: Rodgers, Scott, EMNRD <Scott.Rodgers@emnrd.nm.gov>; Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>; Tacoma Morrissey <tmorrissey@ensolum.com>; Ben Belill <bbelill@ensolum.com>; Jeremy Reich <reich@ensolum.com>; robert.d.woodall@exxonmobil.com; richard.kotzur@exxonmobil.com; Romero, Rosa, EMNRD <RosaM.Romero@emnrd.nm.gov>; Minnix, Sharon, EMNRD <Sharon.Minnix@emnrd.nm.gov>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>
Subject: RE: [EXTERNAL] XTO - Sampling Plan - Highlander Compressor Station - nAPP2606139393

Good afternoon-

We are anticipating on beginning delineation at the Highlander CS fire next week. Are sample notifications required for the delineation data if we intend to utilize it in a Closure Request?

We appreciate the clarification,



Tracy Hillard
Project Engineer
575-937-3906
Ensolum, LLC
in f X

From: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>
Sent: Monday, June 1, 2026 2:32 PM
To: Tracy Hillard <thillard@ensolum.com>
Cc: Rodgers, Scott, EMNRD <Scott.Rodgers@emnrd.nm.gov>; Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>;

Tacoma Morrissey <tmorrissey@ensolum.com>; Ben Belill <bbelill@ensolum.com>; Jeremy Reich <jreich@ensolum.com>; robert.d.woodall@exxonmobil.com; richard.kotzur@exxonmobil.com; Romero, Rosa, EMNRD <RosaM.Romero@emnrd.nm.gov>; Minnix, Sharon, EMNRD <Sharon.Minnix@emnrd.nm.gov>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>

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[**EXTERNAL EMAIL**]

Tracy,

If there is no deviation from the most stringent closure criteria found on Table I of 19.15.29 NMAC, delineation soil sampling can be completed, and a Remediation Work Plan can be submitted once the results are received.

If there will be any deviation away from the most stringent closure criteria, a wetland delineation must be performed by a certified professional wetland scientist.

The 90-day extension request is approved. The new due date is August 24, 2026.

Thank you,

Brittany Hall • Environmental Field Compliance Supervisor
Environmental Field Compliance Group
EMNRD - Oil Conservation Division
1000 Rio Brazos Road | Aztec, NM 87410
505.517.5333 | Brittany.Hall@emnrd.nm.gov
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Effective 12/1/2024: OCD has updated guidance on karst potential occurrence zones. This notice can be found at: <https://www.emnrd.nm.gov/ocd/ocd-announcements-and-notifications/> under "2024 OCD ANNOUNCEMENTS AND NOTIFICATIONS".

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From: Tracy Hillard <thillard@ensolum.com>

Sent: Monday, June 1, 2026 12:45 PM

To: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>

Cc: Rodgers, Scott, EMNRD <Scott.Rodgers@emnrd.nm.gov>; Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>; Tacoma Morrissey <tmorrissey@ensolum.com>; Ben Belill <bbelill@ensolum.com>; Jeremy Reich <jreich@ensolum.com>; robert.d.woodall@exxonmobil.com; richard.kotzur@exxonmobil.com; Romero, Rosa, EMNRD <RosaM.Romero@emnrd.nm.gov>; Minnix, Sharon, EMNRD <Sharon.Minnix@emnrd.nm.gov>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>

Subject: RE: [EXTERNAL] XTO - Sampling Plan - Highlander Compressor Station - nAPP2606139393

Ms. Hall-

Thank you for your review of the wetland characterization and for the clarification provided.

As previously stated, we do not anticipate impacts due to the lack of fluid release at the site. Based on this understanding, if the strictest Table I standards are applied, can we proceed with delineation soil sampling and submit a Remediation Work Plan to present the analytical results and proposed next steps without conducting a wetland survey? Alternatively, please confirm if completion of a wetland survey is required regardless of applied Closure Criteria.

XTO intends to submit a Remediation Work Plan within 30 days of receipt of the final laboratory analytical data resulting from delineation activities. To accommodate this schedule, XTO respectfully requests a 90-day extension of the current May 26, 2026, deadline.

**Tracy Hillard**

Project Engineer

575-937-3906

Ensolum, LLC

in f X

From: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>**Sent:** Thursday, May 28, 2026 11:39 AM**To:** Tracy Hillard <thillard@ensolum.com>**Cc:** Rodgers, Scott, EMNRD <Scott.Rodgers@emnrd.nm.gov>; Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>; Tacoma Morrissey <tmorrissey@ensolum.com>; Ben Belill <bbelill@ensolum.com>; Jeremy Reich <jreich@ensolum.com>; robert.d.woodall@exxonmobil.com; richard.kotzur@exxonmobil.com; Romero, Rosa, EMNRD <RosaM.Romero@emnrd.nm.gov>; Minnix, Sharon, EMNRD <Sharon.Minnix@emnrd.nm.gov>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>**Subject:** RE: [EXTERNAL] XTO - Sampling Plan - Highlander Compressor Station - nAPP2606139393

[**EXTERNAL EMAIL**]

Tracy,

The OCD will require the mapped riverine to be evaluated by a certified wetland scientist prior to approving the sampling plan. The responsible party must utilize a Professional Wetland Scientist (PWS) to conduct a Wetland Delineation Survey following the Corps of Engineers Wetlands Delineation Manual. The PWS is required to perform the review and sign off on all conducted surveys, using the Army Corps of Engineers Wetland Determination Data Sheets, Arid West Region. All parts of the wetland within 300 feet of any part of the release must be evaluated in the survey. A Wetland Delineation report is required to be included which should contain an executive summary of the survey including a description of the site location, sampling points, a scaled sampling diagram, captioned photographs of each sample point, completed Wetland Determination Data Sheets, conclusions/findings and a Curriculum Vitae from the PWS, to include their PWS Certificate Number.

Thank you,

Brittany Hall • Environmental Field Compliance Supervisor

Environmental Field Compliance Group

EMNRD - Oil Conservation Division

1000 Rio Brazos Road | Aztec, NM 87410

505.517.5333 | Brittany.Hall@emnrd.nm.gov<http://www.emnrd.nm.gov/ocd/>

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From: Tracy Hillard <thillard@ensolum.com>**Sent:** Friday, May 22, 2026 12:40 PM**To:** Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>**Cc:** Rodgers, Scott, EMNRD <Scott.Rodgers@emnrd.nm.gov>; Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>

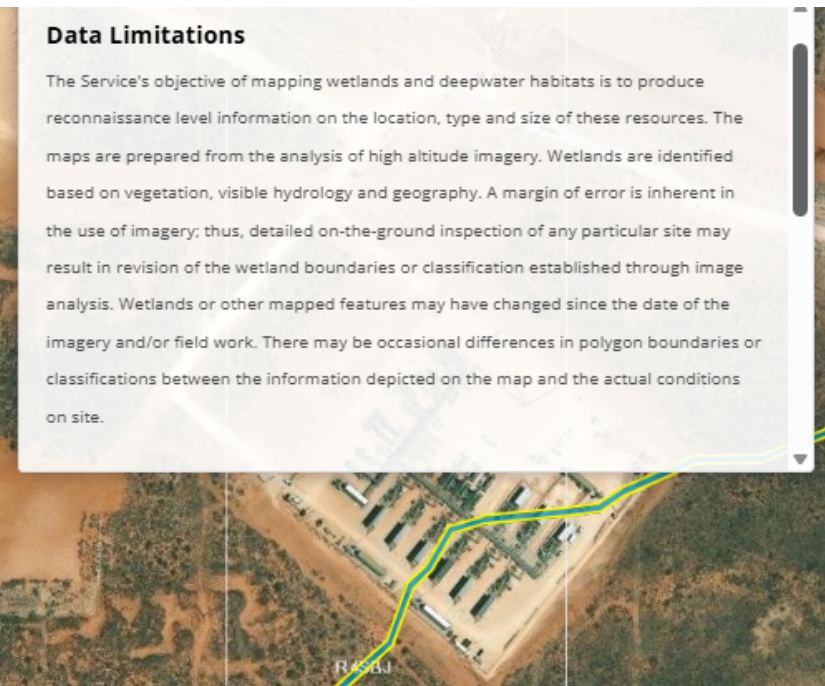
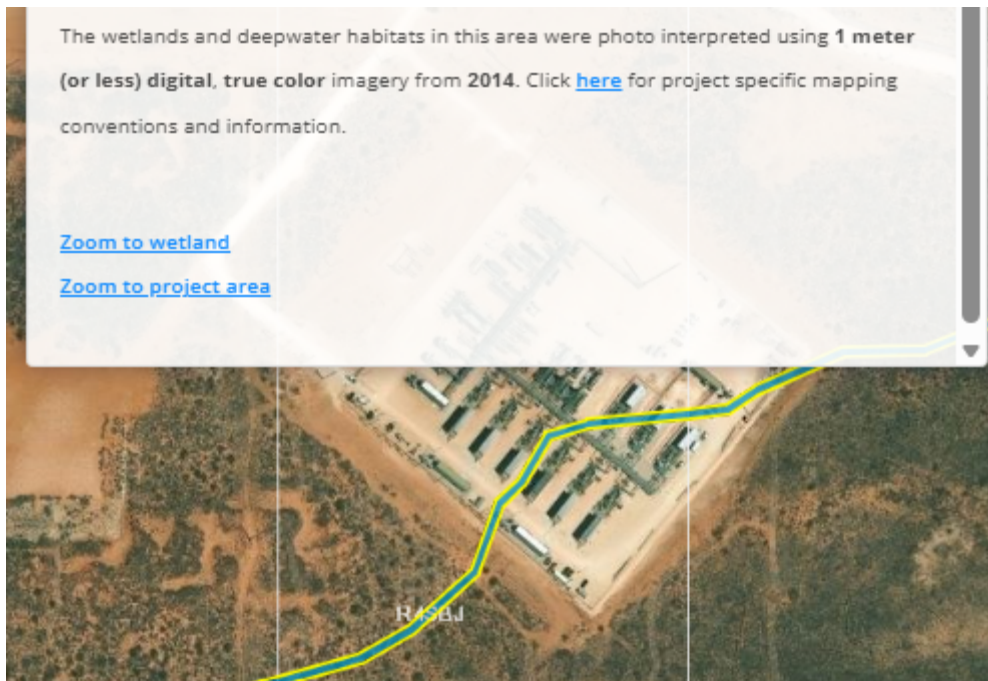
Tacoma Morrissey <tmorrissey@ensolum.com>; Ben Belill <bbelill@ensolum.com>; Jeremy Reich <jreich@ensolum.com>; robert.d.woodall@exxonmobil.com; richard.kotzur@exxonmobil.com; Romero, Rosa, EMNRD <RosaM.Romero@emnrd.nm.gov>; Minnix, Sharon, EMNRD <Sharon.Minnix@emnrd.nm.gov>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>

Subject: RE: [EXTERNAL] XTO - Sampling Plan - Highlander Compressor Station - nAPP2606139393

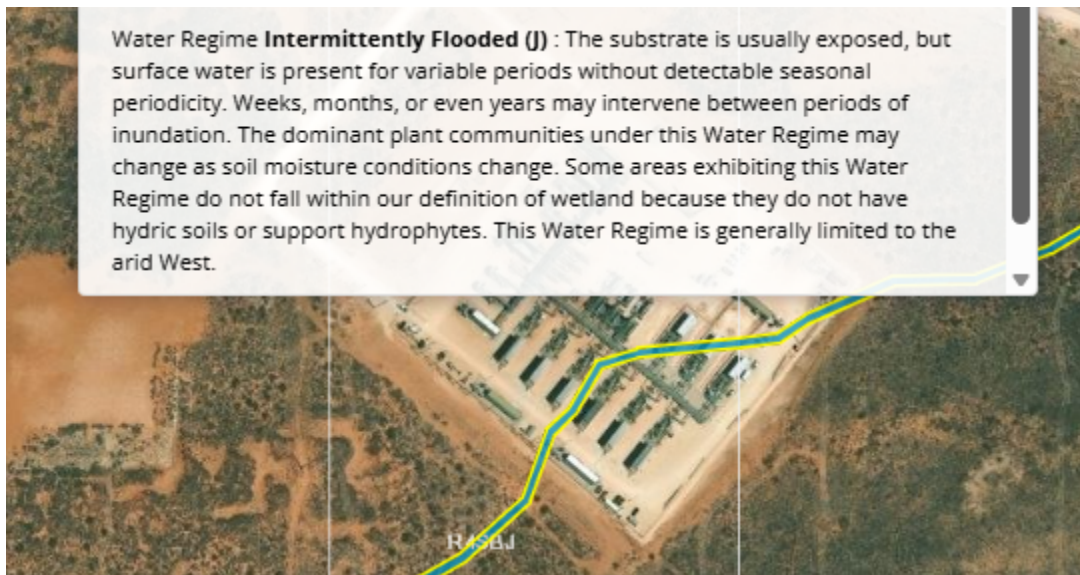
Hi Brittany,

Thank you for your reply and consideration. A formal wetland delineation was not conducted at the site by a certified wetland scientist. However, a review of available mapping resources and field observations was completed to assess the potential presence of wetlands.

The National Wetlands Inventory (NWI) indicates that mapped features are based on interpretation of surface waters and wetlands using 1-meter (or finer) digital true-color imagery from 2014. As such, the presence of a feature on the U.S. Fish and Wildlife Service Wetlands Mapper is not, in itself, a confirmation that the area meets the regulatory definition of a jurisdictional wetland.



The mapped feature is classified with the water regime Intermittently Flooded (J). Under this classification, the substrate is typically exposed, with surface water present only for variable and irregular periods. The NWI further notes that areas exhibiting this regime may not qualify as wetlands if they lack hydric soils and do not support hydrophytic vegetation—conditions that were not observed during site reconnaissance and are very typical of this region (arid west). Based on field observations and application of the appropriate classification criteria (R4SBJ), the area was not identified as a wetland, but considered as a potential watercourse (Riverine, intermittent streambed) which determined to be absent during the pedestrian survey.



Notwithstanding this determination, and as a conservative measure to ensure compliance with applicable Reclamation Requirements, the most stringent standards are being applied to the upper four feet of the fire-affected area. This depth encompasses the interpreted extent of the mapped feature, despite the absence of wetland indicators in the field. Additionally, no fluids were released at the site. The only disturbance observed resulted from a brush fire, and impacted soils are not expected to be encountered during assessment activities.

Given these conditions, completion of a formal wetland delineation by a certified wetland scientist is not expected to alter the proposed approach or the resulting protective measures. Accordingly, the proposed Sampling Plan and variance request remain protective of groundwater, human health, and the environment and XTO respectfully requests approval of the Sampling Plan and variance request and asks that any additional conditions from OCD be included in the response.

Thank you,



Tracy Hillard

Project Engineer

575-937-3906

Ensolum, LLC

in f X

From: Hall, Brittany, EMNRD <Brittany.Hall@emnrn.dnm.gov>

Sent: Friday, May 22, 2026 10:27 AM

To: Tracy Hillard <thillard@ensolum.com>

Cc: Rodgers, Scott, EMNRD <Scott.Rodgers@emnrn.dnm.gov>; Enviro, OCD, EMNRD <OCD.Enviro@emnrn.dnm.gov>;

Tacoma Morrissey <tmorrissey@ensolum.com>; Ben Belill <bbelill@ensolum.com>; Jeremy Reich

<jreich@ensolum.com>; robert.d.woodall@exxonmobil.com; richard.kotzur@exxonmobil.com; Romero, Rosa,

EMNRD <RosaM.Romero@emnrn.dnm.gov>; Minnix, Sharon, EMNRD <Sharon.Minnix@emnrn.dnm.gov>; Bratcher,

Michael, EMNRD <mike.bratcher@emnrn.dnm.gov>

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[**EXTERNAL EMAIL**]

Tracy,

The significant watercourse identified in the site characterization information is also considered a wetland. Was a wetland delineation, performed by a certified wetland scientist, performed at this site?

Thank you,

Brittany Hall • Environmental Field Compliance Supervisor
Environmental Field Compliance Group
EMNRD - Oil Conservation Division
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From: Tracy Hillard <thillard@ensolum.com>

Sent: Thursday, May 14, 2026 6:45 AM

To: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>

Cc: Rodgers, Scott, EMNRD <Scott.Rodgers@emnrd.nm.gov>; Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>; Tacoma Morrissey <tmorrissey@ensolum.com>; Ben Belill <bbelill@ensolum.com>; Jeremy Reich <jreich@ensolum.com>; robert.d.woodall@exxonmobil.com; richard.kotzur@exxonmobil.com; Romero, Rosa, EMNRD <RosaM.Romero@emnrd.nm.gov>; Minnix, Sharon, EMNRD <Sharon.Minnix@emnrd.nm.gov>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>

Subject: RE: [EXTERNAL] XTO - Sampling Plan - Highlander Compressor Station - nAPP2606139393

Good morning Ms. Hall-

Thank you for reviewing the Sampling Plan for the pasture grass fire at the Highlander Compressor Station (Incident Number nAPP2606139393). Attached are the results of the pedestrian watercourse survey that was completed on May 6, 2026, to verify if the feature complies with the definition of a significant watercourse per Subsection P of 19.15.17.7 NMAC. After review of the photographic documentation, no indications of a significant watercourse were identified at any point of the National Hydrography Dataset (NHD) mapped watercourse. The pedestrian watercourse survey path, and photos from the survey are depicted in Figure 1.

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

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

A reclamation requirement of 600 mg/kg chloride and 100 mg/kg TPH applies to the top 4 feet of the off-pad area that was impacted by the incident, per 19.15.29.13.D (1) NMAC for the top 4 feet of areas that will be reclaimed following remediation. A Site Receptor Map is included in Figure 2.

Based on the confirmation of the Closure Criteria, XTO is submitting this Sampling Plan to confirm locations of delineation to assess the presence or absence of impacts related to the Incident. On February 25, 2026, a flare malfunction resulted in a flare fire which ignited the adjacent pasture grass and the fire spread due to high winds. No fluids were released. Eddy

County Fire Department responded and extinguished the fire. Approximately 1,357,910 square feet of pasture grasses were burned by the fire. XTO submitted a Notification of Release (NOR) and an Initial C-141 Application (C-141) on March 2, 2026, to the New Mexico Oil Conservation Division (NMOCD) and NMOCD assigned Incident Number nAPP2606139393. To assess the scorched area, even though no fluids were released, XTO proposes to collect 42 delineation soil borings (BH01 through BH42). Discrete soil samples will be collected at surface and 0.5 feet bgs to confirm the absence of impacts. In addition, XTO proposes to collect 32 lateral delineation soil samples (SS01 through SS32) to confirm the lateral extent. The proposed delineation soil sample locations are presented on Figure 3. The soil samples will be field screened for volatile organic compounds (VOCs) and chlorides and submitted to an approved laboratory for the analysis of benzene, BTEX, TPH, and chloride.

With this proposed sampling plan, XTO is submitting a written request for a variance from 19.15.29.12 NMAC D. (1)(c) and requesting approval to utilize the above-mentioned delineation soil samples as final closure samples, in-lieu of confirmation soil samples collected every 200-square foot. In support of this variance request, XTO is providing (1) a detailed statement: No fluids were released as a result of the flare fire. The 1,357,910 square feet of pasture that was affected was burned, not affected by fluids, as such confirmation soil sampling should not be required. In this instance we would request that the delineation soil samples- assuming analytical results are compliant with the Closure Criteria and reclamation requirement- provide sufficient documentation of absence of impacts resulting from the brush fire. Following a review of the analytical results of the delineation soil samples and assuming no impacts are identified, the area will be reseeded with the Bureau of Land Management (BLM) seed mix #2 or alternatively requested seed mix from the BLM; and (2) demonstration that the variance is equally protective of freshwater, public health, and the environment: Confirmation soil sampling in accordance with the rule would require collection of over 6,790 composite soil samples across this area, significantly increasing site traffic, soil disturbance, soil compaction, and further impact to relatively undisturbed areas, beyond the fire. Additionally, fire can be a natural and beneficial process in grassland ecosystems, often promoting nutrient cycling, reducing invasive species, and stimulating new vegetation growth. Rather than introducing additional disturbance through extensive sampling, reseeded is a typical best practice following fires and would better support natural recovery and restoration of the pasture. Site characterization has confirmed that no sensitive receptors are present in the area, and the proposed delineation soil sampling will adequately confirm the absence of impacts while minimizing unnecessary environmental disturbance.

XTO will initiate delineation activities within 2 weeks of approval of the Sampling Plan and variance request. The delineation soil sampling is anticipated to take approximately 3 to 5 days. XTO will submit a Closure Request or Remediation Work Plan, if needed, within 30 days of final receipt of the laboratory analytical data. To allow for this schedule, XTO respectfully requests a 90-day extension of the May 26, 2026, deadline.

XTO respectfully requests approval of the Sampling Plan and variance request and asks that any additional conditions from OCD be included in the response.

Thanks,



Tracy Hillard
Project Engineer
575-937-3906
Ensolum, LLC



From: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>
Sent: Wednesday, April 29, 2026 10:42 AM
To: Tracy Hillard <thillard@ensolum.com>
Cc: Rodgers, Scott, EMNRD <Scott.Rodgers@emnrd.nm.gov>; Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>; Tacoma Morrissey <tmorrissey@ensolum.com>; Ben Belill <bbelill@ensolum.com>; Jeremy Reich <reich@ensolum.com>; robert.d.woodall@exxonmobil.com; richard.kotzur@exxonmobil.com; Romero, Rosa, EMNRD <RosaM.Romero@emnrd.nm.gov>; Minnix, Sharon, EMNRD <Sharon.Minnix@emnrd.nm.gov>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>
Subject: RE: [EXTERNAL] XTO - Sampling Plan - Highlander Compressor Station - nAPP2606139393

[**EXTERNAL EMAIL**]

Tracy,

At this time, the alternative sampling plan is denied. OCD will not approve alternative sampling plans that have pending site characterization work (pedestrian watercourse survey). An alternative sampling plan can be submitted once all site characterization work is completed and a definitive Table I release closure criteria can be determined. Please be advised that the presence of lease roads and pads interrupting or disrupting the flow of any watercourse does not exclude these features from being defined as a watercourse. Pursuant to 19.15.29.13 A. "The responsible party must substantially restore the impacted surface areas to the condition that existed prior to the release or their final land use. Restoration of the site must include the replacement of removed material and must be replaced to the near original relative positions and contoured to achieve erosion control, long term stability and preservation of surface water flow patterns" and 19.15.29.13 D. NMAC, "Reclamation of areas no longer in use. The responsible party shall reclaim all areas disturbed by the remediation and closure, except areas reasonably needed for production operations or for subsequent drilling operations, as early and as nearly as practical to their original condition or their final land use and maintain those areas to control dust and minimize erosion to the extent practical."

Additionally, the variance to utilize the delineation soil samples as confirmation soil samples is denied. Pursuant to 19.15.29.14 A. NMAC, "A responsible party may file a written request for a variance from any requirement of 19.15.29 NMAC with the appropriate division district office. The variance request must include: (1) a detailed statement explaining the need for a variance; and (2) a detailed written demonstration that the variance will provide equal or better protection of fresh water, public health and the environment." The variance request as written, does not include a detailed statement explaining the need for a variance or a detailed written demonstration that the variance will provide equal or better protection of fresh water, public health, and the environment

A complete and accurate remediation plan or remediation closure report must be submitted through the OCD Permitting website by May 26, 2026.

Thank you,

Brittany Hall • Environmental Field Compliance Supervisor
Environmental Field Compliance Group
EMNRD - Oil Conservation Division
1000 Rio Brazos Road | Aztec, NM 87410
505.517.5333 | Brittany.Hall@emnrd.nm.gov
<http://www.emnrd.nm.gov/ocd/>

Effective 12/1/2024: OCD has updated guidance on karst potential occurrence zones. This notice can be found at: <https://www.emnrd.nm.gov/ocd/ocd-announcements-and-notifications/> under "2024 OCD ANNOUNCEMENTS AND NOTIFICATIONS".

The Digital C-141 guidance documents can be found at <https://www.emnrd.nm.gov/ocd/ocd-announcements-and-notifications/> or <https://www.emnrd.nm.gov/ocd/ocd-forms/>.

From: Tracy Hillard <thillard@ensolum.com>

Sent: Wednesday, April 22, 2026 8:52 AM

To: Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>

Cc: Tacoma Morrissey <tmorrissey@ensolum.com>; Ben Belill <bbelill@ensolum.com>; Jeremy Reich <jreich@ensolum.com>; Woodall, Robert D <robert.d.woodall@exxonmobil.com>; Kotzur, Richard <richard.kotzur@exxonmobil.com>

Subject: [EXTERNAL] XTO - Sampling Plan - Highlander Compressor Station - nAPP2606139393

You don't often get email from thillard@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 morning-

Ensolum, LLC (Ensolum), on behalf of XTO Energy, Inc. (XTO), has prepared this Sampling Plan to confirm sampling locations at the Highlander Compressor Station (Site).

The incident was initially reported in Unit F, Section 22, Township 24 South, Range 30 East, but after review of incident location and photographs taken during the Site assessment, it was confirmed that the affected area extended into Units F through J, Section 22, Township 24 South, Range 30 East, in Eddy County, New Mexico (32.205257°, -103.869405°) and is associated with oil and gas exploration and production operations on Federal land managed by the Bureau of Land Management (BLM).

On February 25, 2026, a flare malfunction resulted in a flare fire which ignited the adjacent pasture grass and the fire spread due to high winds. No fluids were released. Eddy County Fire Department responded and extinguished the fire. Approximately 1,357,910 square feet of pasture grasses were burned by the fire. XTO submitted a Notification of Release (NOR) and an Initial C-141 Application (C-141) on March 2, 2026, to the New Mexico Oil Conservation Division (NMOCD) and NMOCD assigned Incident Number nAPP2606139393.

The Site was characterized to determine the applicable Closure Criteria and assess for the presence of sensitive receptors. Depth to groundwater at the Site is estimated to be greater than 100 feet below ground surface (bgs) based on the nearest groundwater well data. On January 16, 2025, a New Mexico Office of the State Engineer (NMOSE) permitted well (C-4911) was advanced to a depth of 105 feet bgs approximately 0.28 miles north of the Site. No groundwater or moisture was encountered during drilling operations. The well was properly plugged and abandoned with drill cuttings and hydrated bentonite chips. The Well Record & Log is included in Appendix A of the attached document.

The closest continuously flowing or significant watercourse to the Site is an intermittently flooded discontinuous riverine located within the Site. Based on a review of aerial imagery, it appears the discontinuous riverine no longer is present due to the presence of lease roads and pads. A pedestrian watercourse survey will be conducted to confirm the presence or absence of the mapped feature. The second closest continuously flowing or significant watercourse to the Site is an intermittently flooded continuous riverine located 3,544 feet north of the Site. The Site is greater than 200 feet from a lakebed, sinkhole, or playa lake and greater than 300 feet from an occupied residence, school, hospital, institution, church, or wetland. The Site is greater than

1,000 feet to a freshwater well or spring and is not within a 100-year floodplain or overlying a subsurface mine. The Site is not underlain by unstable geology (low potential karst designation area). Potential Site receptors are identified on Figure 1.

Based on the results of the Site Characterization prior to confirmation of the watercourse, 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

A reclamation requirement of 600 mg/kg chloride and 100 mg/kg TPH applies to the top 4 feet of the off-pad area that was impacted by the incident, per 19.15.29.13.D (1) NMAC for the top 4 feet of areas that will be reclaimed following remediation regardless of the results of the pedestrian watercourse survey.

Due to the high level of confidence that no fluids impacted the scorched area, XTO is proposing collection of delineation soil samples collected in 42 locations (BH01 through BH42). The soil samples will be collected at surface and 0.5 feet bgs to confirm the absence of impacts. In addition, XTO proposes collecting 32 lateral delineation samples (SS01 through SS32) to confirm the lateral extent. The proposed delineation soil sample locations are presented on Figure 2. The soil samples will be field screened for volatile organic compounds (VOCs) and chlorides and submitted to an approved laboratory for the analysis of benzene, BTEX, TPH, and chloride.

Following a review of the laboratory analytical results, if no impacted or waste-containing soil is identified, XTO requests a variance to utilize the delineation soil samples as confirmation soil samples. Soil sampling notifications will be submitted at least 48 hours in advance of the delineation soil sampling activities.

XTO requests approval of this Sampling Plan and communication of any additional sampling requests for Incident Number nAPP2606139393.

Thank you,



Tracy Hillard

Project Engineer

575-937-3906

Ensolum, LLC

in f X

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 593328

CONDITIONS

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|---|--|
| Operator: XTO ENERGY, INC 3617 North Big Spring Street Midland, TX 79705 | OGRID: 5380 |
| | Action Number: 593328 |
| | Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF) |

CONDITIONS

| Created By | Condition | Condition Date |
|---------------|-----------|----------------|
| sharon.minnix | None | 6/8/2026 |