

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, 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
220 South St. Francis Dr.
Santa Fe, NM 87505

For temporary pits, closed-loop systems, and below-grade tanks, submit to the appropriate NMOCD District Office.
For permanent pits and exceptions submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

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Pit, Closed-Loop System, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application

- Type of action: Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method
 Existing BGT Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method
 Modification to an existing permit
 Closure plan only submitted for an existing permitted or non-permitted pit, closed-loop system, below-grade tank, or proposed alternative method

Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, below-grade tank or alternative request

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.
 Operator: XTO Energy, Inc. OGRID #: 5380
 Address: #382 County Road 3100, Aztec, NM 87410
 Facility or well name: Ropco 16 #1
 API Number: 30-045-30942 OCD Permit Number: _____
 U/L or Qtr/Qtr B Section 16 Township 29N Range 14W County: San Juan
 Center of Proposed Design: Latitude 36.731233 Longitude 108.311363 NAD: 1927 1983
 Surface Owner: Federal State Private Tribal Trust or Indian Allotment

2.
 Pit: Subsection F or G of 19.15.17.11 NMAC
 Temporary: Drilling Workover
 Permanent Emergency Cavitation P&A
 Lined Unlined Liner type: Thickness _____ mil LLDPE HDPE PVC Other _____
 String-Reinforced
 Liner Seams: Welded Factory Other _____ Volume: _____ bbl Dimensions: L _____ x W _____ x D _____

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OIL CONS. DIV.
DIST. 3

3.
 Closed-loop System: Subsection H of 19.15.17.11 NMAC
 Type of Operation: P&A Drilling a new well Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent)
 Drying Pad Above Ground Steel Tanks Haul-off Bins Other _____
 Lined Unlined Liner type: Thickness _____ mil LLDPE HDPE PVC Other _____
 Liner Seams: Welded Factory Other _____

4.
 Below-grade tank: Subsection I of 19.15.17.11 NMAC
 Volume: 21 bbl Type of fluid: Produced Water
 Tank Construction material: Steel
 Secondary containment with leak detection Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
 Visible sidewalls and liner Visible sidewalls only Other Visible sidewalls, vaulted, automatic high-level shut off, no liner
 Liner type: Thickness _____ mil HDPE PVC Other _____

5.
 Alternative Method:
 Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

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6. **Fencing:** Subsection D of 19.15.17.11 NMAC (*Applies to permanent pits, temporary pits, and below-grade tanks*)

Chain link, six feet in height, two strands of barbed wire at top (*Required if located within 1000 feet of a permanent residence, school, hospital, institution or church*)

Four foot height, four strands of barbed wire evenly spaced between one and four feet

Alternate. Please specify Four foot height, steel mesh field fence (hogwire) with pipe top railing

7. **Netting:** Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)

Screen Netting Other Expanded metal or solid vaulted top

Monthly inspections (If netting or screening is not physically feasible)

8. **Signs:** Subsection C of 19.15.17.11 NMAC

12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers

Signed in compliance with 19.15.3.103 NMAC

9. **Administrative Approvals and Exceptions:**
 Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.
Please check a box if one or more of the following is requested, if not leave blank:

Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau office for consideration of approval.

Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

10. **Siting Criteria (regarding permitting):** 19.15.17.10 NMAC
Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to drying pads or above-grade tanks associated with a closed-loop system.

Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (Applies to temporary, emergency, or cavitation pits and below-grade tanks) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (Applies to permanent pits) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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11. **Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
 - Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
 - Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
 - Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
 - Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
 - Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
- Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____

12. **Closed-loop Systems Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9
 - Siting Criteria Compliance Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19.15.17.10 NMAC
 - Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
 - Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
 - Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
- Previously Approved Design (attach copy of design) API Number: _____
- Previously Approved Operating and Maintenance Plan API Number: _____ (Applies only to closed-loop system that use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)

13. **Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- Climatological Factors Assessment
- Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- Quality Control/Quality Assurance Construction and Installation Plan
- Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- Nuisance or Hazardous Odors, including H₂S, Prevention Plan
- Emergency Response Plan
- Oil Field Waste Stream Characterization
- Monitoring and Inspection Plan
- Erosion Control Plan
- Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

14. **Proposed Closure:** 19.15.17.13 NMAC
Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

- Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Closed-loop System
 Alternative
- Proposed Closure Method: Waste Excavation and Removal
 Waste Removal (Closed-loop systems only)
 On-site Closure Method (Only for temporary pits and closed-loop systems)
 In-place Burial On-site Trench Burial
 Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

15. **Waste Excavation and Removal Closure Plan Checklist:** (19.15.17.13 NMAC) *Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.*

- Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
- Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)
- Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

16.

Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only: (19.15.17.13.D NMAC)

Instructions: Please indentify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Will any of the proposed closed-loop system operations and associated activities occur on or in areas that *will not* be used for future service and operations?

Yes (If yes, please provide the information below) No

Required for impacted areas which will not be used for future service and operations:

- Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

17.

Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC

Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.

- | | |
|---|---|
| Ground water is less than 50 feet below the bottom of the buried waste.
- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | <input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> NA |
| Ground water is between 50 and 100 feet below the bottom of the buried waste
- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | <input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> NA |
| Ground water is more than 100 feet below the bottom of the buried waste.
- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | <input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> NA |
| Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).
- Topographic map; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.
- NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended.
- Written confirmation or verification from the municipality; Written approval obtained from the municipality | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within 500 feet of a wetland.
- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within the area overlying a subsurface mine.
- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within an unstable area.
- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within a 100-year floodplain.
- FEMA map | <input type="checkbox"/> Yes <input type="checkbox"/> No |

18.

On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
- Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of 19.15.17.11 NMAC
- Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
- Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
- Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
- Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
- Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

19.

Operator Application Certification:

I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): Kim Champlin Title: Environmental Representative

Signature: Kim Champlin Date: 11-26-08

e-mail address: kim_champlin@xtoenergy.com Telephone: (505) 333-3100

20.

OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)

OCD Representative Signature: [Signature] Approval Date: 6/3/13

Title: Senior Hydrologist Compliance Officer
OCD Permit Number: _____

21.

Closure Report (required within 60 days of closure completion): Subsection K of 19.15.17.13 NMAC

Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.

Closure Completion Date: 5/10/13

22.

Closure Method:

- Waste Excavation and Removal On-Site Closure Method Alternative Closure Method Waste Removal (Closed-loop systems only)
- If different from approved plan, please explain.

23.

Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:

Instructions: Please identify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Were the closed-loop system operations and associated activities performed on or in areas that will not be used for future service and operations?

- Yes (If yes, please demonstrate compliance to the items below) No

Required for impacted areas which will not be used for future service and operations:

- Site Reclamation (Photo Documentation)
- Soil Backfilling and Cover Installation
- Re-vegetation Application Rates and Seeding Technique

24.

Closure Report Attachment Checklist: *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

- Proof of Closure Notice (surface owner and division)
- Proof of Deed Notice (required for on-site closure)
- Plot Plan (for on-site closures and temporary pits)
- Confirmation Sampling Analytical Results (if applicable)
- Waste Material Sampling Analytical Results (required for on-site closure)
- Disposal Facility Name and Permit Number
- Soil Backfilling and Cover Installation
- Re-vegetation Application Rates and Seeding Technique
- Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude _____ Longitude _____ NAD: 1927 1983

25.

Operator Closure Certification:

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): James McDaniel, CHMM #15676 Title: EHS Supervisor

Signature: [Signature] Date: 6/10/13

e-mail address: James_McDaniel@xtoenergy.com Telephone: 505-333-3701



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State of New Mexico
Energy Minerals and Natural Resources

Form C-141
Revised October 10, 2003

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

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company: XTO Energy, Inc.	Contact: James McDaniel
Address: 382 Road 3100, Aztec, New Mexico 87410	Telephone No.: (505) 333-3202
Facility Name: ROPCO 16 #1 (30-045-30942)	Facility Type: Gas Well

Surface Owner: State	Mineral Owner:	Lease No.:
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
B	16	29N	14W	997	FNL	1563	FEL	San Juan

Latitude: 36.731233 Longitude: -108.311363

NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: Unknown	Volume Recovered: None
Source of Release: Below Grade Tank	Date and Hour of Occurrence: Unknown	Date and Hour of Discovery: 5/3/2013
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

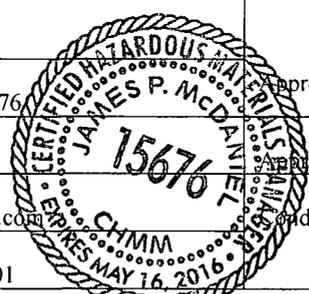
If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.
The below grade tank was removed at the ROPCO 16 #1 well site due to maintenance upgrades at this facility. The BGT cellar was sampled for TPH via USEPA Method 8015 and 418.1, for BTEX via USEPA Method 8021, and for total chlorides. The sample returned results below the 'Pit Rule' spill confirmation standards for TPH, total BTEX and chlorides, but above the 250 ppm chloride standard at 480 ppm, confirming that a release has occurred at this location. The site was then ranked according to the NMOCD Guidelines for the Remediation of Leaks, Spills and Releases. The site was ranked a 40 due to an estimated depth to groundwater of less than 50 feet and a distance to surface water of less than 200 feet. This set the closure standard to 100 ppm TPH, 10 ppm benzene, and 50 ppm total BTEX.

Describe Area Affected and Cleanup Action Taken.
A release has been confirmed for this location.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.

Signature: 	OIL CONSERVATION DIVISION	
Printed Name: James McDaniel, CHMM #15676	Approved by District Supervisor:	
Title: EH&S Supervisor	Approval Date:	Expiration Date:
E-mail Address: James_McDaniel@xtoenergy.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 6/10/2013	Phone: 505-333-3701	



XTO Energy Inc. San Juan Basin Below Grade Tank Closure Report

Lease Name: ROPCO 16 #1

API No.: 30-045-30942

Description: Unit B, Section 16, Township 29N, Range 14W, San Juan County

In accordance with Rule 19.15.17.13 NMAC the following information describes the closure requirements of below-grade tanks on XTO Energy Inc. (XTO) locations. This is XTO's standard procedure for all below-grade tanks. A separate plan will be submitted for any below-grade tank which does not conform to this plan.

General Plan

1. XTO will close below-grade tanks within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the division requires because of imminent danger to fresh water, public health or the environment.
Closure Date is May 10, 2013
2. XTO will close a below-grade tank that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years after June 16, 2008, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC.
Closure Date is March 10, 2013
3. XTO will close a permitted below-grade tank within 60 days of cessation of the below-grade tank's operation or as required by the transitional provisions of Subsection B of 19.15.17.17 NMAC in accordance with a closure plan that the appropriate division district office approves. The closure report will be filed on form C-144.
Required C-144 Form is attached to this document.
4. XTO will remove liquids and sludge from below-grade tanks prior to implementing a closure method and will dispose of the liquids and sludge in a division-approved facility. Approved facilities and waste streams include:
 - Envirotech Permit No. NM01-0011 and IEI Permit No. NM 01-0010B
 - Soil contaminated by exempt petroleum hydrocarbons
 - Produced sand, pit sludge and contaminated bottoms from storage of exempt wastes
 - Basin Disposal Permit No. NM01-005
 - Produced water**All liquids and sludge were removed from the tank prior to closure activities.**
5. XTO will remove the below-grade tank and dispose of it in a division approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves.
XTO has removed the below grade tank, and will dispose of it at a division approved facility, or recycle, reclaim or reuse it in a manner that is approved by the division.

6. XTO will remove any on-site equipment associated with a below-grade tank unless the equipment is required for some other purpose.

All equipment will remain on-site for the continued production of oil and gas.

7. XTO will test the soils beneath the below-grade tank to determine whether a release has occurred. At a minimum 5 point composite sample will be collected along with individual grab samples from any area that is wet, discolored or showing other evidence of a release. Samples will be analyzed for BTEX, TPH and chlorides to demonstrate that the benzene concentration, as determined by EPA SW-846 methods 8021B or 8260B or EPA method that the division approves, does not exceed 0.2 mg/kg; total BTEX concentration, as determined by EPA SW-846 methods 8021B or 8260B or other EPA method that the division approves, does not exceed 50 mg/kg; the TPH concentration, as determined by EPA method 418.1 or other EPA method that the division approves, does not exceed 100mg/kg; and the chloride concentration, as determined by EPA method 300.1 or other EPA method that the division approves, does not exceed 250 mg/kg, or the background concentration, whichever is greater. XTO will notify the division of its results on form C-141.

A composite sample was taken of the pit using sampling tools and all samples tested per Subsection B of 19.15.17.1 3(B)(1)(b). (Sample results attached).

Components	Test Method	Limit (mg/Kg)	Results (mg/Kg)
Benzene	EPA SW-846 8021B or 8260B	0.2	< 0.0027 mg/kg
BTEX	EPA SW-846 8021B or 8260B	50	< 0.0406 mg/kg
TPH	EPA SW-846 418.1	100	26.7 mg/kg
Chlorides	EPA 300.1	250 or background	480 mg/kg
TPH (Spill Rule)	EPA Method 8015 Modified	100	< 4.95 mg/kg

8. If XTO or the division determines that a release has occurred, XTO will comply with 19.15.3.116 NMAC and 19.15.1.19NMAC as appropriate.

Due to chloride levels of 480 ppm, a release has been confirmed for this location. A C-141 Release Notification form will be sent outlining any remediation activities taken regarding this release.

9. If the sampling program demonstrates that a release has not occurred or that any release does not exceed the concentrations specified in Paragraph (4) of Subsection E of 19.15.17.13 NMAC, XTO will backfill the excavation with compacted, non-waste containing, earthen material; construct a division prescribed soil cover; recontour and re-vegetate the site.

The pit cellar was backfilled using compacted, non-waste containing earthen material, with a division prescribed soil cover.

10. Notice of Closure operations will be given to the Aztec Division District III office between 72 hours and one week prior to the start of closure activities via email or verbally.

The notification will include the following:

- i. Operator's name
- ii. Well Name and API Number
- iii. Location by Unit Letter, Section, Township, and Range

Notification was provided to Mr. Brandon Powell with the Aztec office of the OCD via email on May 3, 2013; see attached email printout.

The surface owner shall be notified of XTO's proposal to close the BGT as per the approved closure plan using certified mail, return receipt requested.

The surface owner was notified on May 3, 2013 via email. See the attached email printout.

11. Re-contouring of location will match fit, shape, line, form and texture of the surrounding area. Re-shaping will include drainage control, prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be placed in areas where needed to prevent erosion on a large scale. Final re-contour shall have a uniform appearance with smooth surface, fitting the natural landscape.
The location will be recontoured to match the above specifications upon the plugging and abandoning of this well location.
12. A minimum of 4 feet of cover shall be achieved and the cover shall include 1 foot of suitable material to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.
The site has been backfilled to match these specifications.
13. XTO will seed the disturbed areas the first growing season after the operator closes the pit. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved methods. BLM or Forest Service stipulated seed mixes will be used on federal lands. Vegetative cover will equal 70% of the native perennial vegetative cover (un-impacted) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintain that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs.
The location will be reclaimed pursuant to landowner specifications upon the plugging and abandoning of this well location.
14. All closure activities will include proper documentation and be available for review upon request and will be submitted in closure report form to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on form C-144 and incorporate the following:
 - i. Proof of closure notice to division and surface owner; **attached**
 - ii. Details on capping and covering, where applicable; **per OCD Specifications**
 - iii. Inspection reports; **attached**
 - iv. Confirmation sampling analytical results; **attached**
 - v. Disposal facility name(s) and permit number(s); **see above**
 - vi. Soil backfilling and cover installation; **per OCD Specifications**
 - vii. Re-vegetation application rates and seeding techniques, (or approved alternative to re-vegetation requirements if applicable); **NA**
 - viii. Photo documentation of the site reclamation. **attached**



Analytical Report

Report Summary

Client: XTO Energy Inc.

Chain Of Custody Number: XTO 001

Samples Received: 5/2/2013 2:45:00PM

Job Number: 98031-0528

Work Order: P305006

Project Name/Location: Ropco 16 #1

Entire Report Reviewed By:

A handwritten signature in black ink, appearing to read "Tim Cain", is written over a horizontal line.

Date: 5/6/13

Tim Cain, Laboratory Manager

The results in this report apply to the samples submitted to Envirotech's Analytical Laboratory and were analyzed in accordance with the chain of custody document supplied by you, the client, and as such are for your exclusive use only. The results in this report are based on the sample as received unless otherwise noted. Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech, Inc. If you have any questions regarding this analytical report, please don't hesitate to contact Envirotech's Laboratory Staff.

XTO Energy Inc. 382 CR 3100 Aztec NM, 87410	Project Name: Ropco 16 #1 Project Number: 98031-0528 Project Manager: James McDaniel	Reported: 06-May-13 10:06
---	--	-------------------------------------

Analytical Report for Samples

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
BGT Closure	P305006-01A	Soil	05/02/13	05/02/13	Glass Jar, 4 oz.

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XTO Energy Inc.	Project Name:	Ropco 16 #1	Reported: 06-May-13 10:06
382 CR 3100	Project Number:	98031-0528	
Aztec NM, 87410	Project Manager:	James McDaniel	

BGT Closure
P305006-01 (Solid)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Total Petroleum Hydrocarbons by 418.1									
Total Petroleum Hydrocarbons	26.7	20.0	mg/kg	1	1318038	03-May-13	03-May-13	EPA 418.1	

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XTO Energy Inc. 382 CR 3100 Aztec NM, 87410	Project Name: Ropco 16 #1 Project Number: 98031-0528 Project Manager: James McDaniel	Reported: 06-May-13 10:06
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Total Petroleum Hydrocarbons by 418.1 - Quality Control
Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1318038 - 418 Freon Extraction										
Blank (1318038-BLK1) Prepared & Analyzed: 03-May-13										
Total Petroleum Hydrocarbons	ND	20.0	mg/kg							
Duplicate (1318038-DUP1) Source: P305006-01 Prepared & Analyzed: 03-May-13										
Total Petroleum Hydrocarbons	22.7	20.0	mg/kg		26.7			16.3	30	
Matrix Spike (1318038-MS1) Source: P305006-01 Prepared & Analyzed: 03-May-13										
Total Petroleum Hydrocarbons	1730	20.0	mg/kg	2000	26.7	85.4	80-120			

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5796 US Highway 64, Farmington, NM 87401

Ph (505) 632-0615 Fx (505) 632-1865

Three Springs - 65 Mercado Street, Suite 115, Durango, CO 81301

Ph (970) 259-0615 Fr (800) 362-1879



XTO Energy Inc. 382 CR 3100 Aztec NM, 87410	Project Name: Ropco 16 #1 Project Number: 98031-0528 Project Manager: James McDaniel	Reported: 06-May-13 10:06
---	--	-------------------------------------

Notes and Definitions

- DET Analyte DETECTED
- ND Analyte NOT DETECTED at or above the reporting limit
- NR Not Reported
- dry Sample results reported on a dry weight basis
- RPD Relative Percent Difference

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James McDaniel
XTO Energy - San Juan Division
382 County Road 3100
Aztec, NM 87410

Report Summary

Tuesday May 07, 2013

Report Number: L633745

Samples Received: 05/03/13

Client Project:

Description: Ropco 16 1

The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.

Entire Report Reviewed By:

Daphne Richards , ESC Representative

Laboratory Certification Numbers

A2LA - 1461-01, AIHA - 100789, AL - 40660, CA - 01157CA, CT - PH-0197,
FL - E87487, GA - 923, IN - C-TN-01, KY - 90010, KYUST - 0016,
NC - ENV375/DW21704/BIO041, ND - R-140. NJ - TN002, NJ NELAP - TN002,
SC - 84004, TN - 2006, VA - 460132, WV - 233, AZ - 0612,
MN - 047-999-395, NY - 11742, WI - 998093910, NV - TN000032011-1,
TX - T104704245-11-3, OK - 9915, PA - 68-02979, IA Lab #364

Accreditation is only applicable to the test methods specified on each scope of accreditation held by ESC Lab Sciences.

Note: The use of the preparatory EPA Method 3511 is not approved or endorsed by the CA ELAP.

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REPORT OF ANALYSIS

James McDaniel
 XTO Energy - San Juan Division
 382 County Road 3100
 Aztec, NM 87410

May 07, 2013

Date Received : May 03, 2013
 Description : Ropco 16 1
 Sample ID : FAR LH-050213
 Collected By : Logan Hixon
 Collection Date : 05/02/13 11:30

ESC Sample # : L633745-01

Site ID :

Project # :

Parameter	Dry Result	Det. Limit	Units	Method	Date	Dil.
Chloride	480	11.	mg/kg	9056	05/06/13	1
Total Solids	91.2	0.100	%	2540 G-2011	05/07/13	1
Benzene	BDL	0.0027	mg/kg	8021/8015	05/05/13	5
Toluene	BDL	0.027	mg/kg	8021/8015	05/05/13	5
Ethylbenzene	BDL	0.0027	mg/kg	8021/8015	05/05/13	5
Total Xylene	BDL	0.0082	mg/kg	8021/8015	05/05/13	5
TPH (GC/FID) Low Fraction	BDL	0.55	mg/kg	GRO	05/05/13	5
Surrogate Recovery-%						
a,a,a-Trifluorotoluene (FID)	101.		% Rec.	8021/8015	05/05/13	5
a,a,a-Trifluorotoluene (PID)	100.		% Rec.	8021/8015	05/05/13	5
TPH (GC/FID) High Fraction	BDL	4.4	mg/kg	3546/DRO	05/06/13	1
Surrogate recovery(%)						
o-Terphenyl	66.6		% Rec.	3546/DRO	05/06/13	1

Results listed are dry weight basis.
 BDL - Below Detection Limit
 Det. Limit - Practical Quantitation Limit (PQL)
 Note:

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 The reported analytical results relate only to the sample submitted
 Reported: 05/07/13 14:30 Printed: 05/07/13 15:05



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 James McDaniel
 382 County Road 3100

Quality Assurance Report
 Level II

Aztec, NM 87410

L633745

May 07, 2013

Analyte	Result	Laboratory Blank		Limit	Batch	Date Analyzed
		Units	% Rec			
Benzene	< .0005	mg/kg			WG659650	05/05/13 00:52
Ethylbenzene	< .0005	mg/kg			WG659650	05/05/13 00:52
Toluene	< .005	mg/kg			WG659650	05/05/13 00:52
TPH (GC/FID) Low Fraction	< .1	mg/kg			WG659650	05/05/13 00:52
Total Xylene	< .0015	mg/kg			WG659650	05/05/13 00:52
a,a,a-Trifluorotoluene (FID)		% Rec.	101.4	59-128	WG659650	05/05/13 00:52
a,a,a-Trifluorotoluene (PID)		% Rec.	100.5	54-144	WG659650	05/05/13 00:52
TPH (GC/FID) High Fraction	< 4	mg/kg			WG659647	05/06/13 08:21
o-Terphenyl		% Rec.	75.70	50-150	WG659647	05/06/13 08:21
Total Solids	< .1	%			WG659621	05/07/13 09:21
Chloride	< 10	mg/kg			WG659670	05/06/13 13:07

Analyte	Units	Result	Duplicate		Limit	Ref Samp	Batch
			Duplicate	RPD			
Total Solids	%	93.0	91.2	1.64	5	L633745-01	WG659621
Chloride	mg/kg	260.	270.	3.77	20	L633551-01	WG659670
Chloride	mg/kg	440.	440.	0	20	L633745-01	WG659670

Analyte	Units	Laboratory Control Sample		% Rec	Limit	Batch
		Known Val	Result			
Benzene	mg/kg	.05	0.0430	86.0	76-113	WG659650
Ethylbenzene	mg/kg	.05	0.0452	90.4	78-115	WG659650
Toluene	mg/kg	.05	0.0437	87.4	76-114	WG659650
Total Xylene	mg/kg	.15	0.138	92.2	81-118	WG659650
a,a,a-Trifluorotoluene (PID)				99.74	54-144	WG659650
TPH (GC/FID) Low Fraction	mg/kg	5.5	5.89	107.	67-135	WG659650
a,a,a-Trifluorotoluene (FID)				102.1	59-128	WG659650
TPH (GC/FID) High Fraction	mg/kg	60	39.2	65.4	50-150	WG659647
o-Terphenyl				70.70	50-150	WG659647
Total Solids	%	50	50.0	100.	85-115	WG659621
Chloride	mg/kg	200	195.	97.5	80-120	WG659670

Analyte	Units	Result	Laboratory Control Sample Duplicate		Limit	RPD	Limit	Batch
			Ref	%Rec				
Benzene	mg/kg	0.0479	0.0430	96.0	76-113	10.7	20	WG659650
Ethylbenzene	mg/kg	0.0503	0.0452	101.	78-115	10.8	20	WG659650
Toluene	mg/kg	0.0487	0.0437	97.0	76-114	10.8	20	WG659650
Total Xylene	mg/kg	0.155	0.138	103.	81-118	11.1	20	WG659650
a,a,a-Trifluorotoluene (PID)				100.2	54-144			WG659650
TPH (GC/FID) Low Fraction	mg/kg	6.03	5.89	110.	67-135	2.49	20	WG659650
a,a,a-Trifluorotoluene (FID)				102.4	59-128			WG659650

* Performance of this Analyte is outside of established criteria.

For additional information, please see Attachment A 'List of Analytes with QC Qualifiers.'



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Aztec, NM 87410

May 07, 2013

L633745

Analyte	Laboratory Control Sample Duplicate				Limit	RPD	Limit	Batch
	Units	Result	Ref	%Rec				
TPH (GC/FID) High Fraction o-Terphenyl	mg/kg	40.6	39.2	68.0 71.80	50-150 50-150	3.51	20	WG659647 WG659647
Chloride	mg/kg	195.	195.	98.0	80-120	0	20	WG659670

Analyte	Units	MS Res	Matrix Spike			Limit	Ref Samp	Batch
			Ref Res	TV	% Rec			
Benzene	mg/kg	0.218	0	.05	87.1	32-137	L633745-01	WG659650
Ethylbenzene	mg/kg	0.231	0	.05	92.2	10-150	L633745-01	WG659650
Toluene	mg/kg	0.226	0	.05	90.3	20-142	L633745-01	WG659650
Total Xylene	mg/kg	0.705	0	.15	94.0	16-141	L633745-01	WG659650
a,a,a-Trifluorotoluene (PID)					100.3	54-144		WG659650
TPH (GC/FID) Low Fraction a,a,a-Trifluorotoluene (FID)	mg/kg	22.4	0.0566	5.5	81.4 100.3	55-109 59-128	L633745-01	WG659650 WG659650
TPH (GC/FID) High Fraction o-Terphenyl	mg/kg	34.5	0	60	57.6 55.60	50-150 50-150	L633684-14	WG659647 WG659647

Analyte	Units	MSD	Matrix Spike Duplicate		Limit	RPD	Limit	Ref Samp	Batch
			Ref	%Rec					
Benzene	mg/kg	0.287	0.218	115.	32-137	27.5	39	L633745-01	WG659650
Ethylbenzene	mg/kg	0.295	0.231	118.	10-150	24.4	44	L633745-01	WG659650
Toluene	mg/kg	0.289	0.226	116.	20-142	24.7	42	L633745-01	WG659650
Total Xylene	mg/kg	0.901	0.705	120.	16-141	24.4	46	L633745-01	WG659650
a,a,a-Trifluorotoluene (PID)				90.39	54-144				WG659650
TPH (GC/FID) Low Fraction a,a,a-Trifluorotoluene (FID)	mg/kg	25.4	22.4	92.3 99.47	55-109 59-128	12.6	20	L633745-01	WG659650 WG659650
TPH (GC/FID) High Fraction o-Terphenyl	mg/kg	37.3	34.5	62.2 60.20	50-150 50-150	7.81	20	L633684-14	WG659647 WG659647

Batch number / Run number / Sample number cross reference

WG659650: R2652800: L633745-01
 WG659647: R2653140: L633745-01
 WG659621: R2655220: L633745-01
 WG659670: R2656180: L633745-01

* * Calculations are performed prior to rounding of reported values.
 * Performance of this Analyte is outside of established criteria.
 For additional information, please see Attachment A 'List of Analytes with QC Qualifiers.'



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Quality Assurance Report
Level II

Aztec, NM 87410

L633745

May 07, 2013

The data package includes a summary of the analytic results of the quality control samples required by the SW-846 or CWA methods. The quality control samples include a method blank, a laboratory control sample, and the matrix spike/matrix spike duplicate analysis. If a target parameter is outside the method limits, every sample that is effected is flagged with the appropriate qualifier in Appendix B of the analytic report.

Method Blank - an aliquot of reagent water carried through the entire analytic process. The method blank results indicate if any possible contamination exposure during the sample handling, digestion or extraction process, and analysis. Concentrations of target analytes above the reporting limit in the method blank are qualified with the "B" qualifier.

Laboratory Control Sample - is a sample of known concentration that is carried through the digestion/extraction and analysis process. The percent recovery, expressed as a percentage of the theoretical concentration, has statistical control limits indicating that the analytic process is "in control". If a target analyte is outside the control limits for the laboratory control sample or any other control sample, the parameter is flagged with a "J4" qualifier for all effected samples.

Matrix Spike and Matrix Spike Duplicate - is two aliquots of an environmental sample that is spiked with known concentrations of target analytes. The percent recovery of the target analytes also has statistical control limits. If any recoveries that are outside the method control limits, the sample that was selected for matrix spike/matrix spike duplicate analysis is flagged with either a "J5" or a "J6". The relative percent difference (%RPD) between the matrix spike and the matrix spike duplicate recoveries is all calculated. If the RPD is above the method limit, the effected samples are flagged with a "J3" qualifier.

From: [Hixon, Logan](#)
To: [BRANDON POWELL \(brandon.powell@state.nm.us\)](#); [jtascek@slo.state.nm.us](#)
Cc: [McDaniel, James](#); [Hoekstra, Kurt](#)
Subject: Ropco 16 #1 (30-045-30942) BGT Closure Notification (21 BBL)
Date: Friday, May 03, 2013 5:54:00 AM
Attachments: [image001.png](#)

Brandon & John Taschek,
Please accept this email as the required notification for the BGT closure activities at the following site:

Ropco 16 #1 (30-045-30942) Located in Section 16, Township 29N, Range 14W, San Juan County New Mexico

This below grade tank is being closed due upgrades being made to this site.
Thank you for your time in regards to this matter.



Thank You!
Logan Hixon
Western Division
382 CR 3100
Aztec NM 87410
Office (505)333- 3683
Cell (505) 386-8018
Logan_Hixon@xtoenergy.com



Well Below Tank Inspection Report

DEN NM Run 69		ROPCO 16 001		Griswold, Marcia Morrow, Pete		ROPCO 16 01		3004530942		16 14W 29N	
InspectorName	Inspection Date	Inspection Time	Visible LinerTears	VisibleTankLeak Overflow	Collection OfSurfaceRun	Visible LayerOil	Visible Leak	Freeboard EstFT	PitLocation	PitType	Notes
BJ Perry	08/25/2008	13:00	No	No	No	No	No	6			
BJ Perry	08/25/2008	13:05	No	Yes	No	Yes	No	2			
BJ Perry	09/15/2008	12:00	No	No	No	No	No	6	Well Water Pi	Below Ground	
BJ Perry	10/30/2008	10:30	No	No	No	No	No	6	Well Water Pi	Below Ground	
BJ Perry	02/06/2009	10:00	No	No	No	No	No	5	Well Water Pi	Below Ground	
BJ Perry	02/06/2009	13:00	No	No	No	No	No	5	CDP Water Pi	Above Ground	PIT CHANGED
gene martin	05/29/2009	08:30	No	No	No	No	No	5	Well Water Pi	Below Ground	
gene martin	10/26/2009	03:00	No	No	No	No	No	5	Well Water Pi	Below Ground	
gene martin	01/30/2010	02:00	No	No	No	No	No	5	Well Water Pi	Below Ground	
gene martin	05/04/2010	12:00	No	No	No	No	No	5	Well Water Pi	Below Ground	
gene martin	06/11/2010	11:00	No	No	No	No	No	5	Well Water Pi	Below Ground	
gene martin	08/27/2010	11:00	No	No	No	No	No	5	Well Water Pi	Below Ground	
gene martin	09/20/2010	09:00	No	No	No	No	No	5	Well Water Pi	Below Ground	
gene martin	12/21/2010	11:00	No	No	No	No	No	5	Well Water Pi	Below Ground	
gene martin	8/24/2011	11:00	No	No	No	No	No	5	Well Water Pi	Below Ground	

XTO Energy, Inc.
ROPCO 16 #1
Section 16, Township 29N, Range 14W
Closure Date: 5/10/2013

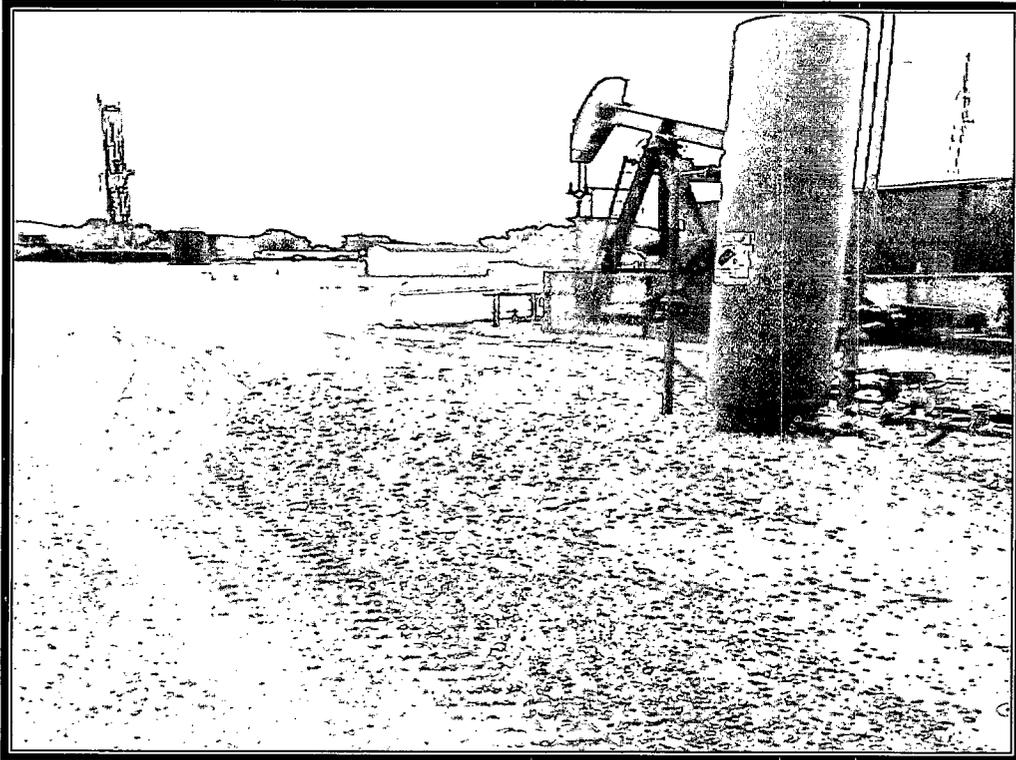


Photo 1: ROPCO 16 #1 after Closure and Backfill

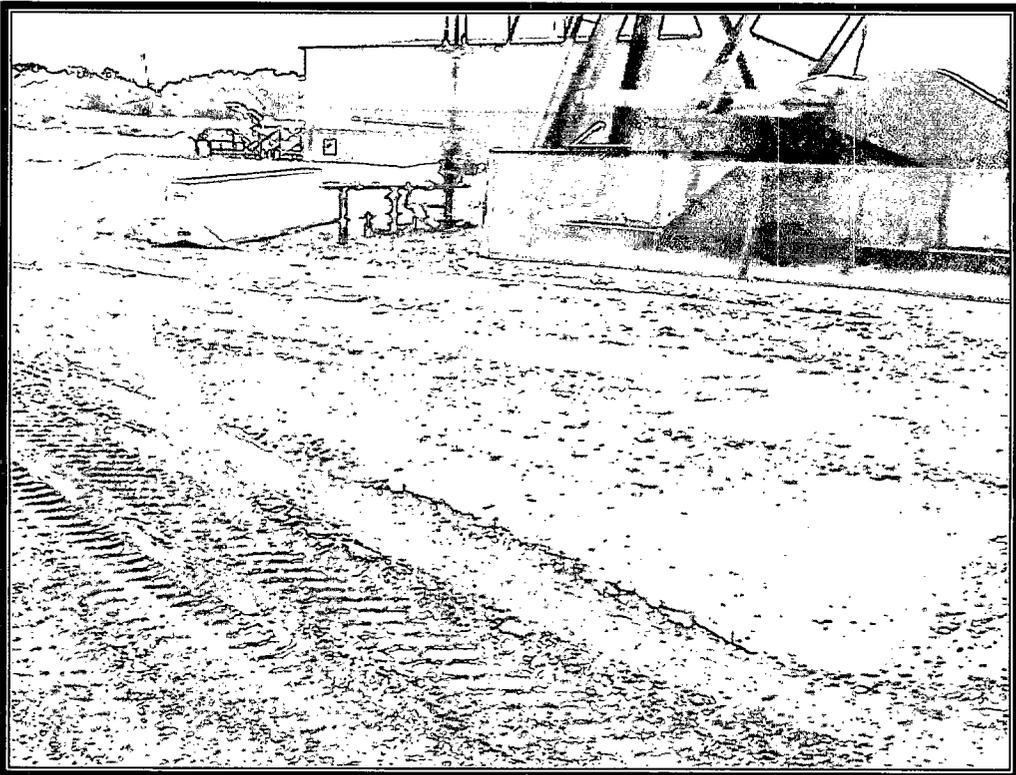


Photo 2: ROPCO 16 #1 after Closure and Backfill