

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-144
Revised June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.
For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

12694
45-06695
Pit, Below-Grade Tank, or
Proposed Alternative Method Permit or Closure Plan Application

Type of action: ☐ Below grade tank registration
☐ Permit of a pit or proposed alternative method
☒ Closure of a pit, below-grade tank, or proposed alternative method
☐ Modification to an existing permit/or registration
☐ Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

Instructions: Please submit one application (Form C-144) per individual pit, 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: PO Pipkin # 1
API Number: 30-045-06695 OCD Permit Number: _____
U/L or Qtr/Qtr H Section 8 Township 27N Range 10W County: San Juan
Center of Proposed Design: Latitude 36.592220 Longitude -107.912789 NAD: ☐ 1927 ☒ 1983
Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

2.
☐ **Pit:** Subsection F, G or J of 19.15.17.11 NMAC
Temporary: ☐ Drilling ☐ Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management Low Chloride Drilling Fluid ☐ yes ☐ no
☐ 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 _____

3.
☒ **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 _____
Liner type: Thickness _____ mil ☐ HDPE ☐ PVC ☐ Other _____

4.
☐ **Alternative Method:**
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5.
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. _____

6.

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

- ☐ Screen ☐ Netting ☐ Other _____
- ☐ Monthly inspections (If netting or screening is not physically feasible)

7.

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 19.15.16.8 NMAC

8.

Variances 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:

- ☐ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.
- ☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

9.

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. Siting criteria does not apply to drying pads or above-grade tanks.

General siting

Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.

- ☒ NM Office of the State Engineer - iWATERS database search; ☐ USGS; ☐ Data obtained from nearby wells

☐ Yes ☐ No
☐ NA

Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.

NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No
☐ NA

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. (**Does not apply to below grade tanks**)

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☐ No

Within the area overlying a subsurface mine. (**Does not apply to below grade tanks**)

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ No

Within an unstable area. (**Does not apply to below grade tanks**)

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ No

Within a 100-year floodplain. (**Does not apply to below grade tanks**)

- FEMA map

☐ Yes ☐ No

Below Grade Tanks

Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)

Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a occupied 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

☐ Yes ☐ No

Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.

NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 100 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Temporary Pit Non-low chloride drilling fluid

Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ 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

☐ Yes ☐ No

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, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Permanent Pit or Multi-Well Fluid Management Pit

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

☐ Yes ☐ No

Within 1000 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

☐ Yes ☐ No

Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 500 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

10.

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: _____

11.

Multi-Well Fluid Management Pit 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.

- ☐ 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
- ☐ A List of wells with approved application for permit to drill associated with the pit.
- ☐ 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
- ☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

☐ Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____

12.

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

13.

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 ☐ Multi-well Fluid Management Pit
☐ 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

14.

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 C 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 H of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

15.

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 require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 25 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 25-50 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 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 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, 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 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, 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
Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 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 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

☐ Yes ☐ No

Within the area overlying a subsurface mine.

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ No

Within an unstable area.

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ No

Within a 100-year floodplain.

- FEMA map

☐ Yes ☐ No

16.

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 E of 19.15.17.13 NMAC
☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K 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 19.15.17.13 NMAC
☐ Waste Material Sampling Plan - based upon the appropriate requirements 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 H of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17.

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): Kurt Hoekstra Title: EHS Coordinator

Signature: Kurt Hoekstra Date: January 5, 2015

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

18.

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

OCD Representative Signature: Jonathan D. Kelly Approval Date: 3/24/2015

Title: Compliance Officer OCD Permit Number: _____

19.

Closure Report (required within 60 days of closure completion): 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: 2-4-15

20.

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.

21.

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 for private land only)
☐ 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

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): Kurt Hoekstra Title: EHS Coordinator

Signature:  Date: 2-16-15

e-mail address: Kurt_Hoekstra@xtoenergy.com Telephone: 505-333-3100

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

State of New Mexico
Energy Minerals and Natural Resources

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

Form C-141
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in
accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☒ Final Report

Name of Company: XTO Energy, Inc.	Contact: Kurt Hoekstra	
Address: 382 Road 3100, Aztec, New Mexico 87410	Telephone No.: (505) 333-3100	
Facility Name: PO Pipkin # 1	Facility Type: Gas Well (Basin Dakota)	
Surface Owner: Federal	Mineral Owner	API No. 30-045-06695

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
H	8	27N	10W	1650	FNL	790	FEL	San Juan

Latitude: 36.592220 Longitude: -107.912789

NATURE OF RELEASE

Type of Release: N/A	Volume of Release: N/A	Volume Recovered: N/A
Source of Release: N/A	Date and Hour of Occurrence N/A	Date and Hour of Discovery: N/A
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 PO Pipkin # 1 well site due to facility upgrades at the well site. The BGT cellar beneath the BGT 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' standards of 100 ppm TPH, 0.2 ppm benzene, 50 ppm total BTEX, and 250 ppm chlorides, confirming that a release has not occurred at this location.

Describe Area Affected and Cleanup Action Taken.*No release has been confirmed at this location and no further action is required.

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.

OIL CONSERVATION DIVISION

Signature: 	Approved by Environmental Specialist:		
Printed Name: Kurt Hoekstra			
Title: EHS Coordinator	Approval Date:	Expiration Date:	
E-mail Address: Kurt_Hoekstra@xtoenergy.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 2-16-15 Phone: 505-333-3100			

* Attach Additional Sheets If Necessary



12065 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-5859
Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

Kurt Hoekstra
XTO Energy - San Juan Division
382 County Road 3100
Aztec, NM 87410

Report Summary

Thursday January 29, 2015

Report Number: L745104

Samples Received: 01/23/15

Client Project:

Description: PO Popkin 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, EPA - TN002

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

This report may not be reproduced, except in full, without written approval from ESC Lab Sciences. Where applicable, sampling conducted by ESC is performed per guidance provided in laboratory standard operating procedures: 060302, 060303, and 060304.



YOUR LAB OF CHOICE

12065 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-5859
Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

January 29, 2015

Kurt Hoekstra
XTO Energy - San Juan Division
382 County Road 3100
Aztec, NM 87410

Date Received : January 23, 2015
Description : PO Popkin 1
Sample ID : FARKH-012215-1110
Collected By : Kurt
Collection Date : 01/22/15 11:10

ESC Sample # : L745104-01

Site ID :

Project # :

Parameter	Dry Result	Det. Limit	Units	Method	Date	Dil.
Chloride	210	11.	mg/kg	9056MOD	01/28/15	1
Total Solids	87.2		%	2540 G-2011	01/28/15	1
Benzene	BDL	0.0029	mg/kg	8021	01/24/15	5
Toluene	BDL	0.029	mg/kg	8021	01/24/15	5
Ethylbenzene	BDL	0.0029	mg/kg	8021	01/24/15	5
Total Xylene	BDL	0.0086	mg/kg	8021	01/24/15	5
TPH (GC/FID) Low Fraction	BDL	0.57	mg/kg	8015	01/24/15	5
Surrogate Recovery-%						
a,a,a-Trifluorotoluene (FID)	96.4		% Rec.	8015	01/24/15	5
a,a,a-Trifluorotoluene (PID)	103.		% Rec.	8021	01/24/15	5
TPH (GC/FID) High Fraction	BDL	4.6	mg/kg	3546/DRO	01/28/15	1
Surrogate recovery(%)						
o-Terphenyl	66.8		% Rec.	3546/DRO	01/28/15	1

Results listed are dry weight basis.

BDL - Below Detection Limit

Det. Limit - Practical Quantitation Limit (PQL)

Note:

This report shall not be reproduced, except in full, without the written approval from ESC.

The reported analytical results relate only to the sample submitted

Reported: 01/29/15 12:17 Printed: 01/29/15 12:17



YOUR LAB OF CHOICE

XTO Energy - San Juan Division
Kurt Hoekstra
382 County Road 3100

Aztec, NM 87410

Quality Assurance Report
Level II

L745104

12065 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-5859
Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

January 29, 2015

Analyte	Result	Laboratory Blank		Limit	Batch	Date Analyzed
		Units	% Rec			
Benzene	< .0005	mg/kg			WG766477	01/24/15 10:04
Ethylbenzene	< .0005	mg/kg			WG766477	01/24/15 10:04
Toluene	< .005	mg/kg			WG766477	01/24/15 10:04
TPH (GC/FID) Low Fraction	< .1	mg/kg			WG766477	01/24/15 10:04
Total Xylene	< .0015	mg/kg			WG766477	01/24/15 10:04
a,a,a-Trifluorotoluene (FID)		% Rec.	97.10	59-128	WG766477	01/24/15 10:04
a,a,a-Trifluorotoluene (PID)		% Rec.	104.0	54-144	WG766477	01/24/15 10:04
Total Solids	< .1	%			WG766816	01/28/15 07:49
TPH (GC/FID) High Fraction	< 4	mg/kg			WG766210	01/28/15 12:51
o-Terphenyl		% Rec.	81.00	50-150	WG766210	01/28/15 12:51
Chloride	< 10	mg/kg			WG766841	01/28/15 12:02

Analyte	Units	Duplicate		RPD	Limit	Ref Samp	Batch
		Result	Duplicate				
Total Solids	%	84.2	85.0	0.941	5	L745111-02	WG766816
Chloride	mg/kg	610.	584.	5.00	20	L745277-03	WG766841
Chloride	mg/kg	110.	115.	3.00	20	L745020-26	WG766841

Analyte	Units	Laboratory Control Sample		% Rec	Limit	Batch
		Known Val	Result			
Benzene	mg/kg	.05	0.0495	98.9	70-130	WG766477
Ethylbenzene	mg/kg	.05	0.0515	103.	70-130	WG766477
Toluene	mg/kg	.05	0.0508	102.	70-130	WG766477
Total Xylene	mg/kg	.15	0.156	104.	70-130	WG766477
a,a,a-Trifluorotoluene (PID)				103.0	54-144	WG766477
TPH (GC/FID) Low Fraction	mg/kg	5.5	5.33	96.8	63.5-137	WG766477
a,a,a-Trifluorotoluene (FID)				104.0	59-128	WG766477
Total Solids	%	50	50.0	100.	85-115	WG766816
TPH (GC/FID) High Fraction	mg/kg	60	48.6	81.0	50-150	WG766210
o-Terphenyl				76.90	50-150	WG766210
Chloride	mg/kg	200	212.	106.	80-120	WG766841

Analyte	Units	Laboratory Control		Sample Duplicate	Limit	RPD	Limit	Batch
		Result	Ref	%Rec				
Benzene	mg/kg	0.0491	0.0495	98.0	70-130	0.740	20	WG766477
Ethylbenzene	mg/kg	0.0514	0.0515	103.	70-130	0.170	20	WG766477
Toluene	mg/kg	0.0502	0.0508	100.	70-130	1.06	20	WG766477
Total Xylene	mg/kg	0.156	0.156	104.	70-130	0.320	20	WG766477
a,a,a-Trifluorotoluene(PID)				103.0	54-144			WG766477
TPH (GC/FID) Low Fraction	mg/kg	5.30	5.33	96.0	63.5-137	0.560	20	WG766477
a,a,a-Trifluorotoluene(FID)				104.0	59-128			WG766477

* Performance of this Analyte is outside of established criteria.

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



12065 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-5859
Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

XTO Energy - San Juan Division
Kurt Hoekstra
382 County Road 3100

Quality Assurance Report
Level II

Aztec, NM 87410

L745104

January 29, 2015

Analyte	Units	Laboratory Control		Sample Duplicate		Limit	RPD	Limit	Batch
		Result	Ref	%Rec					
TPH (GC/FID) High Fraction	mg/kg	52.7	48.6	88.0	50-150	8.01	20	WG766210	
o-Terphenyl				80.10	50-150			WG766210	
Chloride	mg/kg	215.	212.	108.	80-120	2.00	20	WG766841	

Analyte	Units	Matrix Spike				Limit	Ref Samp	Batch
		MS Res	Ref Res	TV	% Rec			
Benzene	mg/kg	0.245	0.000574	.05	98.0	49.7-127	L745104-01	WG766477
Ethylbenzene	mg/kg	0.254	0.000528	.05	100.	40.8-141	L745104-01	WG766477
Toluene	mg/kg	0.253	0.00154	.05	100.	49.8-132	L745104-01	WG766477
Total Xylene	mg/kg	0.767	0.00267	.15	100.	41.2-140	L745104-01	WG766477
a,a,a-Trifluorotoluene (PID)					103.0	54-144		WG766477
TPH (GC/FID) Low Fraction	mg/kg	21.2	0.0	5.5	77.0	28.5-138	L745104-01	WG766477
a,a,a-Trifluorotoluene (FID)					102.0	59-128		WG766477
TPH (GC/FID) High Fraction	mg/kg	45.7	2.70	60	72.0	50-150	L745078-01	WG766210
o-Terphenyl					65.20	50-150		WG766210
Chloride	mg/kg	602.	146.	500	91.0	80-120	L745248-01	WG766841

Analyte	Units	Matrix Spike Duplicate				Limit	RPD	Limit	Ref Samp	Batch
		MSD	Ref	%Rec						
Benzene	mg/kg	0.299	0.245	120.	49.7-127	19.9	23.5	L745104-01	WG766477	
Ethylbenzene	mg/kg	0.309	0.254	123.	40.8-141	19.5	23.8	L745104-01	WG766477	
Toluene	mg/kg	0.303	0.253	121.	49.8-132	18.0	23.5	L745104-01	WG766477	
Total Xylene	mg/kg	0.931	0.767	124.	41.2-140	19.4	23.7	L745104-01	WG766477	
a,a,a-Trifluorotoluene (PID)				99.40	54-144				WG766477	
TPH (GC/FID) Low Fraction	mg/kg	23.9	21.2	86.9	28.5-138	12.1	23.6	L745104-01	WG766477	
a,a,a-Trifluorotoluene (FID)				102.0	59-128				WG766477	
TPH (GC/FID) High Fraction	mg/kg	47.9	45.7	75.4	50-150	4.81	20	L745078-01	WG766210	
o-Terphenyl				69.20	50-150				WG766210	
Chloride	mg/kg	573.	602.	85.4	80-120	5.00	20	L745248-01	WG766841	

Batch number / Run number / Sample number cross reference

WG766477: R3016608: L745104-01
WG766816: R3016731: L745104-01
WG766210: R3016926: L745104-01
WG766841: R3017013: L745104-01

* * 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.'



YOUR LAB OF CHOICE

XTO Energy - San Juan Division
Kurt Hoekstra
382 County Road 3100

Aztec, NM 87410

Quality Assurance Report
Level II

L745104

12065 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-5859
Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

January 29, 2015

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.

* Sample ID will be the office and sampler-date-military time FARJM-MMDDYY-1200



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

January 28, 2015

Kurt Hoekstra
XTO Energy
382 County Road 3100
Aztec, NM 87410
TEL: (505) 333-3100
FAX (555) 333-3280

RE: PO Pipkin #1

OrderNo.: 1501813

Dear Kurt Hoekstra:

Hall Environmental Analysis Laboratory received 1 sample(s) on 1/23/2015 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Analytical ReportLab Order **1501813**

Date Reported: 1/28/2015

Hall Environmental Analysis Laboratory, Inc.**CLIENT:** XTO Energy**Client Sample ID:** FARKH-012215-1110/BGT CE**Project:** PO Pipkin #1**Collection Date:** 1/22/2015 11:10:00 AM**Lab ID:** 1501813-001**Matrix:** SOIL**Received Date:** 1/23/2015 6:50:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 418.1: TPH						Analyst: JME	
Petroleum Hydrocarbons, TR	48	20		mg/Kg	1	1/28/2015 12:00:00 PM	17398

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank	Page 1 of 2
	E	Value above quantitation range	H	Holding times for preparation or analysis exceeded	
	J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit	
	O	RSD is greater than RSDlimit	P	Sample pH greater than 2.	
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit	
	S	Spike Recovery outside accepted recovery limits			

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1501813

28-Jan-15

Client: XTO Energy

Project: PO Pipkin #1

Sample ID	MB-17398	SampType:	MBLK	TestCode:	EPA Method 418.1: TPH					
Client ID:	PBS	Batch ID:	17398	RunNo:	23944					
Prep Date:	1/26/2015	Analysis Date:	1/28/2015	SeqNo:	706280	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	ND	20								

Sample ID	LCSD-17398	SampType:	LCSD	TestCode:	EPA Method 418.1: TPH					
Client ID:	LCSS02	Batch ID:	17398	RunNo:	23944					
Prep Date:	1/26/2015	Analysis Date:	1/28/2015	SeqNo:	706282	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	94	20	100.0	0	93.8	86.7	126	0	20	

Sample ID	LCS-17398	SampType:	LCS	TestCode:	EPA Method 418.1: TPH					
Client ID:	LCSS	Batch ID:	17398	RunNo:	23944					
Prep Date:	1/26/2015	Analysis Date:	1/28/2015	SeqNo:	706285	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	94	20	100.0	0	93.8	86.7	126			

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2.
- RL Reporting Detection Limit



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: XTO Energy

Work Order Number: 1501813

RcptNo: 1

Received by/date: AT 01/23/15

Logged By: Anne Thorne

1/23/2015 8:50:00 AM

Anne Thorne

Completed By: Anne Thorne

1/23/2015

Anne Thorne

Reviewed By: AT 01/23/15

Chain of Custody

1. Custody seals intact on sample bottles? Yes ☐ No ☐ Not Present ☒
2. Is Chain of Custody complete? Yes ☒ No ☐ Not Present ☐
3. How was the sample delivered? Courier

Log In

4. Was an attempt made to cool the samples? Yes ☒ No ☐ NA ☐
5. Were all samples received at a temperature of $>0^{\circ}\text{C}$ to 6.0°C ? Yes ☒ No ☐ NA ☐
6. Sample(s) in proper container(s)? Yes ☒ No ☐
7. Sufficient sample volume for indicated test(s)? Yes ☒ No ☐
8. Are samples (except VOA and ONG) properly preserved? Yes ☒ No ☐
9. Was preservative added to bottles? Yes ☐ No ☒ NA ☐
10. VOA vials have zero headspace? Yes ☐ No ☐ No VOA Vials ☒
11. Were any sample containers received broken? Yes ☐ No ☒
12. Does paperwork match bottle labels?
(Note discrepancies on chain of custody) Yes ☒ No ☐
13. Are matrices correctly identified on Chain of Custody? Yes ☒ No ☐
14. Is it clear what analyses were requested? Yes ☒ No ☐
15. Were all holding times able to be met?
(If no, notify customer for authorization.) Yes ☒ No ☐

of preserved
bottles checked
for pH: _____
(<2 or >12 unless noted)
Adjusted? _____
Checked by: _____

Special Handling (if applicable)

16. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☒

Person Notified: _____

Date: _____

By Whom: _____

Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person

Regarding: _____

Client Instructions: _____

17. Additional remarks:

18. Cooler Information

Cooler No.	Temp. $^{\circ}\text{C}$	Condition	Seal Intact	Seal No.	Seal Date	Signed By
1	1.0	Good	Yes			



Quote Number

Page ___ of ___

XTO Contact

KURT

XTO Contact Phone #

505-486-9543

Email Results to:

JAMES, KURT, LOGAN

Well Site/Location

P.O. PICKIN #1

Collected By

KURT

Company

XTO

API Number

30-045-06695

Samples on Ice

(Y/N)

QA/QC Requested

Y

Test Reason

BGT CLOSURE

Turnaround

X Standard

Next Day

Two Day

Three Day

Std. 5 Bus. Days (by contract)

Date Needed

Gray Areas for Lab Use Only!

Analysis

Lab Information

Office Abbreviations

Farmington = FAR

Durango = DUR

Bakken = BAK

Raton = RAT

Piceance = PC

Roosevelt = RSV

La Barge = LB

Orangeville = OV

Signature

Kurt Hukker

Sample ID

Sample Name

Media

Date

Time

Preservative

No. of
Conts.

FARJH-012215-1110

BGT CLOSURE

S

1-22

1610

ON ICE

1

TPH 418.1

Sample Number

1501813-001

Media : Filter = F Soil = S Wastewater = WW Groundwater = GW Drinking Water = DW Sludge = SG Surface Water = SW Air = A Drill Mud = DM Other = OT

Relinquished By: (Signature)

Date:

1-22-15

Time:

1:00

Received By: (Signature)

Christie Wagner

Number of Bottles

Sample Condition

Relinquished By: (Signature)

Date:

1/22/15

Time:

1744

Received By: (Signature)

Christie Wagner 01/23/15

Temperature:

10

Other Information

Relinquished By: (Signature)

Date:

Time:

Received for Lab by: (Signature)

Date:

Time:

Comments

* Sample ID will be the office and sampler-date-military time FARJM-MMDDYY-1200

0130

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

Lease Name: PO Pipkin # 1

API No.: 30-045-06695

Description: Unit H, Section 8, Township 27N, Range 10W, 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 obtain approval of this closure plan prior to commencing closure of the below grade tank at this location pursuant to 19.15.17.13.C (1) NMAC

Approval date of this closure plan was January 14th, 2015

2. XTO will notify the surface owner by certified mail, return receipt requested, that the operator plans closure operations at least 72 hours, but no more than one week, prior to any closure operation. Notice will include:

- a. Well Name
- b. API #
- c. Well Location

The surface owner was notified on January 15th, 2015 via email. Email has been approved as a means of surface owner notification to the BLM by Brandon Powell, NMOCD Aztec Office.

3. XTO will notify the NMOCD Aztec Office by email that the operator plans closure operations at least 72 hours, but no more than one week, prior to any closure operation. Notice will include:

- a. Well Name
- b. API #
- c. Well Location

Notification was provided to Mr. Brandon Powell with the Aztec office of the OCD via email on January 15th, 2015; see attached email printout.

4. Within 60 days of cessation of operations, 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:

- a. Soils, tank bottoms, produced sand, pit sludge and other exempt wastes impacted by petroleum hydrocarbons will be disposed of at:

Envirotech: Permit #NM01-0011 and IEI: Permit # NM01-0010B

- b. Produced Water will be disposed of at:

Basin Disposal: Permit # NM01-005 and XTO owned salt water Disposal Facilities

All liquids and sludge were removed from the tank prior to closure activities.

5. Within six (6) months of cessation of operations, 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. If there is any equipment associated with a below-grade tank, then the operator shall remove the equipment, unless the equipment is required for some other purpose.

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.

All equipment has been removed due to the plugging and abandoning of the PO Pipkin #1 well site.

6. XTO will collect a closure sample of the soil beneath the location of the below grade tank that is being closed. The closure sample will consist of a five-point composite sample to include any obvious stained or wet soils, or other evidence of contamination. The closure sample will be analyzed for all constituents listed in Table I below, including DRO+GRO, Chlorides, TPH, benzene and BTEX.

A five point composite sample was taken of the pit using sampling tools and all samples tested per 19.15.17.1.3. (Sample results attached)

TABLE I			
Depth Below bottom of pit to groundwater less than 10,000 mg/l TDS	Constituent	Method	Limit
≤ 50 Feet	Chloride	EPA 9056	600 mg/kg
	TPH	Method 418.1	100 mg/kg
	BTEX	Method 8021B	50 mg/kg
	Benzene	Method 8021B	10 mg/kg
51 feet - 100 feet	Chloride	EPA 9056	10,000 mg/kg
	TPH	Method 418.1	2,500 mg/kg
	GRO + DRO	Method 8015	1,000 mg/kg
	BTEX	Method 8021B	50 mg/kg
	Benzene	Method 8021B	10 mg/kg
> 100 feet	Chloride	EPA 9056	20,000 mg/kg
	TPH	EPA 418.1	2,500 mg/kg
	GRO + DRO	Method 8015	1,000 mg/kg
	BTEX	Method 8021B	50 mg/kg
	Benzene	Method 8021B	10 g/kg

Components	Test Method	Limit (mg/Kg)	Results (mg/Kg)
Benzene	EPA 8021B	0.2	< 0.0029 mg/kg
BTEX	EPA 8021B	50	0.0434 mg/kg
TPH	EPA 418.1	100	48 mg/kg
Chlorides	EPA 9056	250 or background	210 mg/kg
TPH	EPA 8015	1,000 mg/kg	<4.63 mg/kg

7. XTO will meet the limits for <50' to groundwater detailed in table I.
- In accordance with Rule 19.15.17.13.C(3)(b) if contaminant concentrations exceed the proposed limit and groundwater is found to be deeper than 50', XTO may elect to submit additional groundwater information to the Division and request a higher closure limit. XTO will submit the additional groundwater data via email documenting the depth to groundwater at the location. XTO will wait for approval of the groundwater data by the NMOCD, prior to completing closure activities at the site.

Groundwater at this location is estimated to be greater than 100 feet

- If a higher closure limit is submitted and approved by the Division, XTO will submit a copy of the request, the groundwater information and the received approval in their closure report

A 2500 ppm closure is requested for this location

8. If any contaminant concentration is higher than the parameters listed in Table I of 19.15.17.13 NMAC, the division may require additional delineation upon review of the results and the operator must receive approval before proceeding with closure. If all contaminant concentrations are less than or equal to the parameters listed in Table I of 19.15.17.13 NMAC, then the operator can proceed to backfill the pit, pad, or excavation with non-waste containing, uncontaminated, earthen material.

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

9. After closure has occurred, XTO will reclaim the former BGT area, if it is no longer being used for extraction of oil and gas, by substantially restoring the impacted surface area to the condition that existed prior to oil and gas operations. XTO will construct the soil cover to the site's existing grade and prevent ponding of water and erosion of the cover materials. The soil cover shall consist of the background thickness of topsoil, or one foot of suitable materials to establish vegetation at the site, whichever is greater. All areas will be reclaimed as early as practicable, and as close to their original condition or land use as possible. They shall be maintained in a way as to control dust and minimize erosion.

The site has been backfilled to match these specifications.

10. XTO will complete reclamation of all disturbed areas no longer in use when the ground disturbance activities at the site have been completed. The reseedling shall take place during the first favorable growing season after closure. Reclamation activities will be considered completed when a uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre-disturbance levels, and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds.

The location will be recontoured to match the above specifications after the well has been P & A'd.

*Re-vegetation and reclamation obligations imposed by other applicable federal, state or tribal agencies on lands managed by those agencies shall supersede the above requirements, provided they provide equal or better protection of fresh water, human health and the environment.

11. XTO will notify the Aztec Office of the NMOCD by C-103 when reclamation and closure activities are completed.
12. Within 60 days of closure, XTO will submit a closure report to the Aztec office of the NMOCD, filed on Form C-144. The report will include the following:
 - a. Proof of closure notice to NMOCD and surface owner; **attached**
 - b. Confirmation sampling analytical results; **attached**
 - c. Soil backfill and cover installation information; **per OCD Specifications**
 - d. Photo documentation of site reclamation; **attached**
 - e. Alternative Table I groundwater criteria request, groundwater information and received approval. (If Needed);

Hoekstra, Kurt

From: Hoekstra, Kurt
Sent: Thursday, January 15, 2015 6:42 AM
To: Mark Kelly (Mark_Kelly@blm.gov); 'Cory.Smith@state.nm.us'
Cc: McDaniel, James (James_McDaniel@xtoenergy.com); Hixon, Logan
Subject: BGT Closure Notification PO Pipkin # 1

Mr. Kelly & Mr. Smith,

Please accept this email as the required 72 hour notification for BGT closure activities at the following site:

PO Pipkin # 1 (API 30-045-06695) located in Unit H, Section 8, Township 27N, Range 10W, San Juan County, New Mexico.

This BGT is being closed due to facility upgrades at this well site.

Work is tentatively scheduled for Wednesday January 21st, 2015 at 8:00 am.

Thank You.

Kurt Hoekstra
EHS Coordinator
XTO Energy
505-333-3202 Office
505-486-9543 Cell
Kurt_Hoekstra@xtoenergy.com



4

F

Well Below Tank Inspection Report

PAGE 6

Division Denver
Index 06/01/2008 - 1/01/2015
Type Value P

RouteName	StopName	Pumper	Foreman	WellName	APIWellNumber	Section	Range	Towns			
DEN NM Run 67	PIPKIN PO 001	Willis, Trent	Sanders, David	PO PIPKIN 01	3004506895	8	10W	27N			
InspectorName	Inspection Date	Inspection Time	Visible Liner Tears	Visible Tank Leak Overflow	Collection Of Surface Run	Visible Layer Oil	Visible Leak	Freeboard Est FT	PitLocation	PitType	Notes
mhhia meak	06/29/2008	11:10	Nn	Nn	Nn	Yes	Nn		?		
Trent Willis	06/11/2008	14:40	Nn	Nn	Nn	Yes	Nn		?		
Trent Willis	10/02/2008	08:40	Nn	Nn	Nn	Yes	Nn		4		
Trent Willis	11/03/2008	11:55	Nn	Nn	Nn	Yes	Nn		4 Wall Water Pit	Rainwater Ground	
Trent Willis	02/05/2009	10:23	Nn	Nn	Nn	Yes	Nn		2 Wall Water Pit	Rainwater Ground	
Trent Willis	03/06/2009	13:00	Nn	Nn	Nn	Yes	Nn		2 Wall Water Pit	Rainwater Ground	
GARY WART	04/13/2009	10:51	Nn	Nn	Nn	Yes	Nn		4 Wall Water Pit	Rainwater Ground	
GARY WART	04/06/2009	13:50	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
GARY WART	06/10/2009	13:22	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
GARY WART	07/07/2009	14:36	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
GARY WART	09/12/2009	10:46	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
GARY WART	09/15/2009	12:26	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
GARY WART	10/27/2009	13:43	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
GARY WART	11/10/2009	17:04	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
Trent Willis	12/11/2009	13:55	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
Trent Willis	01/03/2010	14:48	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	No Change
GARY WART	02/25/2010	10:56	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
GARY WART	03/01/2010	12:16	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
GARY WART	04/26/2010	14:44	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
GARY WART	05/06/2010	12:09	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
KIRBY TWIRI	06/03/2010	11:48	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
Trent Willis	07/12/2010	10:03	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
Trent Willis	08/05/2010	11:32	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
GARY WART	09/15/2010	11:58	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
GARY WART	12/05/2010	11:11	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
GARY WART	01/15/2011	12:52	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
GARY WART	02/25/2011	14:12	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
Trent Willis	03/05/2011	16:02	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
GARY WART	04/10/2011	12:25	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
LDR	04/15/2011	09:00	Nn	Nn	Nn	Yes	Nn		2 Compressor Water Pit	Rainwater Ground	Comp oil
LDR	04/21/2011	12:00	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	Comp oil
LDR	05/02/2011	11:38	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	Comp oil
LDR	06/01/2011	09:50	Nn	Nn	Nn	Yes	Nn		2 Compressor Water Pit	Rainwater Ground	Comp oil
LDR	6/1/2011	9:50	No	No	No	Yes	No		2 Compressor Water Pit	Below Ground	Comp oil
LDR	7/7/2011	7:30	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	Comp oil
LDR	8/2/2011	8:36	Nn	Nn	Nn	Yes	Nn		2 Compressor Water Pit	Rainwater Ground	Comp oil
LDR	8/8/2011	12:40	Nn	Nn	Nn	Yes	Nn		4 Wall Water Pit	Rainwater Ground	Comp oil
LDR	10/4/2011	9:15	Nn	Nn	Nn	Yes	Nn		3 Compressor Water Pit	Rainwater Ground	Comp oil
DR	11/2/2011	12:40	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
DR	12/2/2011	12:30	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
DR	1/12/2012	12:43	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
DR	2/2/2012	10:30	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
DR	3/1/2012	10:58	Nn	Nn	Nn	Yes	Nn		4 Wall Water Pit	Rainwater Ground	
DR	4/5/2012	9:38	Nn	Nn	Nn	Yes	Nn		4 Wall Water Pit	Rainwater Ground	
DR	4/7/2012	9:40	Nn	Nn	Nn	Yes	Nn		4 Wall Water Pit	Rainwater Ground	
DR	4/8/2012	7:03	Nn	Nn	Nn	Yes	Nn		4 Wall Water Pit	Rainwater Ground	
DR	7/6/2012	12:56	Nn	Nn	Nn	Yes	Nn		4 Wall Water Pit	Rainwater Ground	
DR	8/3/2012	8:36	Nn	Nn	Nn	Yes	Nn		4 Wall Water Pit	Rainwater Ground	
DR	8/7/2012	8:55	Nn	Nn	Nn	Yes	Nn		4 Wall Water Pit	Rainwater Ground	
DR	10/4/2012	12:02	Nn	Nn	Nn	Yes	Nn		4 Wall Water Pit	Rainwater Ground	
DR	11/6/2012	10:53	Nn	Nn	Nn	Yes	Nn		4 Wall Water Pit	Rainwater Ground	
DR	12/4/2012	1:27	Nn	Nn	Nn	Yes	Nn		4 Wall Water Pit	Rainwater Ground	
DR	1/4/2013	8:41	Nn	Nn	Nn	Yes	Nn		4 Wall Water Pit	Rainwater Ground	
DR	2/8/2013	11:36	Nn	Nn	Nn	Yes	Nn		4 Wall Water Pit	Rainwater Ground	
DR	3/7/2013	9:24	Nn	Nn	Nn	Yes	Nn		4 Wall Water Pit	Rainwater Ground	
DR	4/5/2013	10:38	Nn	Nn	Nn	Yes	Nn		4 Wall Water Pit	Rainwater Ground	
DR	5/8/2013	1:04	Nn	Nn	Nn	Yes	Nn		4 Wall Water Pit	Rainwater Ground	
DR	6/4/2013	1:01	Nn	Nn	Nn	Yes	Nn		4 Wall Water Pit	Rainwater Ground	
DR	7/5/2013	9:40	Nn	Nn	Nn	Yes	Nn		4 Wall Water Pit	Rainwater Ground	
DR	8/9/2013	12:36	Nn	Nn	Nn	Yes	Nn		3 Wall Water Pit	Rainwater Ground	
DR	9/8/2013	11:51	Nn	Nn	Nn	Yes	Nn		5 Wall Water Pit	Rainwater Ground	
DR	10/4/2013	8:53	Nn	Nn	Nn	Yes	Nn		5 Wall Water Pit	Rainwater Ground	
DR	11/7/2013	1:13	Nn	Nn	Nn	Yes	Nn		5 Wall Water Pit	Rainwater Ground	
DR	12/3/2013	9:23	Nn	Nn	Nn	Yes	Nn		5 Wall Water Pit	Rainwater Ground	
DR	1/10/2014	2:44	Nn	Nn	Nn	Yes	Nn		5 Wall Water Pit	Rainwater Ground	
DR	2/7/2014	1:00	Nn	Nn	Nn	Yes	Nn		5 Wall Water Pit	Rainwater Ground	
DR	3/6/2014	1:44	Nn	Nn	Nn	Yes	Nn		5 Wall Water Pit	Rainwater Ground	
DR	4/7/2014	2:51	Nn	Nn	Nn	Yes	Nn		5 Wall Water Pit	Rainwater Ground	
DR	5/6/2014	2:48	Nn	Nn	Nn	Yes	Nn		5 Wall Water Pit	Rainwater Ground	
TRENT WIS I	6/27/2014	15:28	Nn	Nn	Nn	Yes	Nn		5 Wall Water Pit	Rainwater Ground	
TRENT WIS I	7/11/2014	12:40	Nn	Nn	Nn	Yes	Nn		5 Wall Water Pit	Rainwater Ground	
TRENT WIS I	8/26/2014	14:48	Nn	Nn	Nn	Yes	Nn		5 Wall Water Pit	Rainwater Ground	N/A CHANGE
TRENT WIS I	9/11/2014	11:30	Nn	Nn	Nn	Yes	Nn		5 Wall Water Pit	Rainwater Ground	N/A CHANGE
TRENT WIS I	10/10/2014	11:00	Nn	Nn	Nn	Yes	Nn		5 Wall Water Pit	Rainwater Ground	N/A CHANGE
TRENT WIS I	11/20/2014	14:30	Nn	Nn	Nn	Yes	Nn		5 Wall Water Pit	Rainwater Ground	N/A CHANGE
TRENT WIS I	12/30/2014	10:36	Nn	Nn	Nn	Yes	Nn		5 Wall Water Pit	Rainwater Ground	N/A CHANGE

**XTO Energy Inc.
San Juan Basin
Below Grade Tank
Variance Page**

Lease Name: PO Pipkin # 1

API No.: 30-045-06695

Description: Unit H, Section 8, Township 27N, Range 10W, San Juan County

In accordance with Rule 19.15.17.15 NMAC, the following outlines all variances that are being requested for below grade tanks at XTO facilities. All variances requested provide equal or better protection of fresh water, public health and the environment.

Fencing

XTO requests a variance on rule 19.15.17.11.D(3) NMAC which requires fencing around below grade tanks to have at least four (4) strands of barbed wire evenly spaced in the interval between one foot and four feet above ground level. XTO instead requests to utilize hogwire fencing at least four (4) feet high with a top rail for fencing around below grade tanks. This will provide equal protection for livestock from the below grade tank.

Closure Requirements

XTO requests a variance on rule 19.15.17.13.C(3)(a) NMAC which requires operators to analyze closure samples for the constituents listed in Table I of 19.15.17.13 NMAC. XTO instead requests to replace the USEPA analytical method 300.0 for total chloride to USEPA Method 9056. The SW846 9056 method Determination of Inorganic Anions By Ion Chromatography, from *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods*, which also contains methods for the analysis of groundwater, is customarily used to comply with RCRA regulations. EPA Method 300.0 Determination of Inorganic Anions by Ion Chromatography is taken from *Methods for Chemical Analysis of Waters and Wastes*, and includes test procedures that are approved for monitoring under the Safe Drinking Water Act (SDWA) and the National Pollutant Discharge Elimination System (NPDES). The Scope of Application for each method is the same, and both methods utilize ion chromatograph instrumentation. Following either procedure, steps for instrument calibration and data calculation are equivalent. Sample preservation, holding time, handling and storage is identical between the two methods. It is expected that data produced from either method should be consistent.

XTO requests a variance on rule 19.15.17.13.E(2) requiring that operators notify the appropriate division office verbally AND in writing at least 72 hours prior to any closure operation. XTO instead requests that the verbal notification be waived, as suggested by the local division office. XTO will provide written notification to the division office in the form of an email at least 72 hours prior to beginning closure activities.

