

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.

16045
Pit, Below-Grade Tank, or
Proposed Alternative Method Permit or Closure Plan Application

OIL CONS. DIV DIST. 3
SEP 12 2017

- 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 Road 3100, Aztec, New Mexico 87410
Facility or well name: Butte # 2
API Number: 30-045-33889 OCD Permit Number: _____
U/L or Qtr/Qtr C Section 18 Township 30N Range 13W County: San Juan
Center of Proposed Design: Latitude 36.817913 Longitude -108.248916 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: 120 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
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. Please specify: Four foot height, steel mesh field fence (hogwire) with pipe top railing

6. **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)

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. **Variations 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	<input type="checkbox"/> Yes <input type="checkbox"/> No

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 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

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

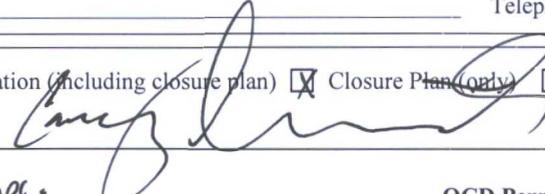
17.
Operator Application Certification:
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

18.
OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)

OCD Representative Signature:  Approval Date: 9/22/17

Title: Environmental Spec. 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: 8-17-2017

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

22.

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: 8-18-2017

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

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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: Butte # 2	Facility Type: Gas Well, Basin Fruitland Coal
Surface Owner: Federal	Mineral Owner
API No. 30-045-33889	

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
C	18	30N	13W	1085	FNL	1225	FWL	San Juan

Latitude: 36.817913 Longitude: -108.248916

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 Butte # 2 well site due to the plugging and abandoning of the location. The BGT cellar beneath the BGT was sampled for TPH via USEPA Method 8015M C6-C40, 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.

Signature: 	OIL CONSERVATION DIVISION	
Printed Name: Kurt Hoekstra	Approved by Environmental Specialist:	
Title: EHS Coordinator	Approval Date:	Expiration Date:
E-mail Address: Kurt_Hoekstra@xtoenergy.com	Conditions of Approval:	
Date: 8-18-2017 Phone: 505-333-3100	Attached <input type="checkbox"/>	

* Attach Additional Sheets If Necessary

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

Lease Name: Butte # 2

API No.: 30-045-33889

Description: Unit C, Section 18, Township 30N, Range 13W, 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: August 17th, 2017
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: August 17th, 2017
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.

The below grade tank has been removed due to the P&A of this well site.

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	<0.000522 mg/kg
BTEX	EPA SW-846 8021B or 8260B	50	< 0.007834 mg/kg
TPH	EPA 8015M	100	< 8.464 mg/kg
Chloride	EPA Method 300	250	43.4 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 the sample results no release has been confirmed for this location.
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 excavation was backfilled using compacted, non-waste containing earthen material..
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. Cory Smith, and Ms. Vanessa Fields with the Aztec office of the OCD via email on July 20th, 2017; 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 June 20th, 2017 Email has been approved as a means of surface owner notification to the BLM by Brandon Powell, NMOCD Aztec Office.

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 when the well is P & A'd.
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 OCD/BLM specifications upon P&A
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/BLM 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/BLM Specifications**
 - vii. Re-vegetation application rates and seeding techniques, (or approved alternative to re-vegetation requirements if applicable); **per OCD/BLM specifications**
 - viii. Photo documentation of the site reclamation. **attached**

XTO Energy - San Juan Division

Sample Delivery Group: L924965
Samples Received: 07/26/2017
Project Number:
Description:
Site: BUTTE #2
Report To: Kurt Hoekstra
382 County Road 3100
Aztec, NM 87410

Entire Report Reviewed By:



Daphne Richards
Technical Service Representative

Results relate only to the items tested or calibrated and are reported as rounded values. This test report shall not be reproduced, except in full, without written approval of the laboratory. Where applicable, sampling conducted by ESC is performed per guidance provided in laboratory standard operating procedures: 060302, 060303, and 060304.

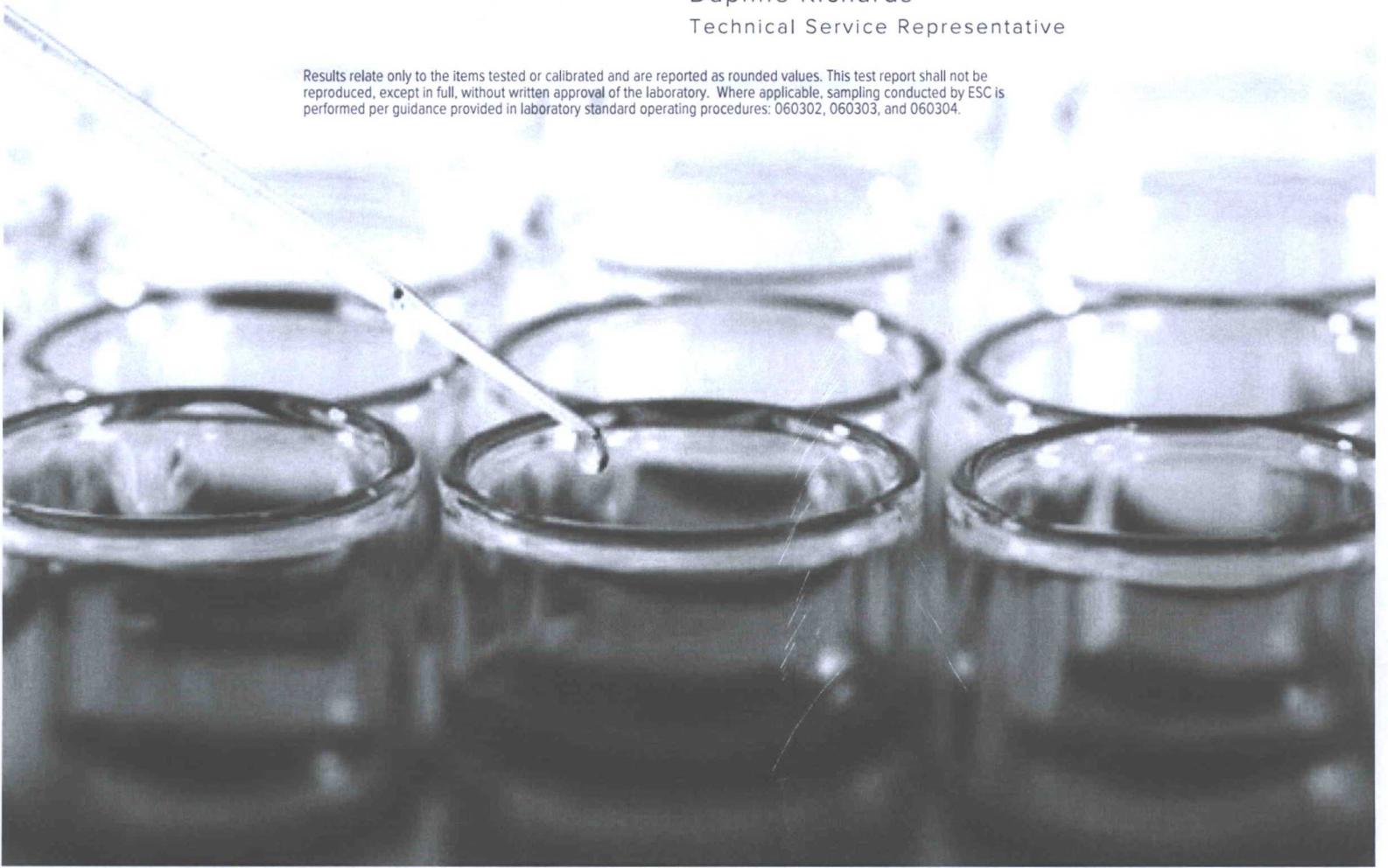


TABLE OF CONTENTS



Cp: Cover Page	1
Tc: Table of Contents	2
Ss: Sample Summary	3
Cn: Case Narrative	4
Sr: Sample Results	5
BUTTE #2 L924965-01	5
Qc: Quality Control Summary	6
Total Solids by Method 2540 G-2011	6
Wet Chemistry by Method 9056A	7
Volatile Organic Compounds (GC) by Method 8015/8021	8
Semi-Volatile Organic Compounds (GC) by Method 8015	10
Gl: Glossary of Terms	11
Al: Accreditations & Locations	12
Sc: Chain of Custody	13



SAMPLE SUMMARY

ONE LAB. NATIONWIDE.



BUTTE #2 L924965-01 Solid

Collected by
Kurt

Collected date/time
07/25/17 10:20

Received date/time
07/26/17 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst
Total Solids by Method 2540 G-2011	WG1003014	1	07/27/17 08:45	07/27/17 08:54	MLW
Wet Chemistry by Method 9056A	WG1003210	1	07/27/17 12:15	07/27/17 15:15	DR
Volatile Organic Compounds (GC) by Method 8015/8021	WG1003354	1	07/27/17 11:06	07/28/17 06:31	JAH
Semi-Volatile Organic Compounds (GC) by Method 8015	WG1004541	1	08/02/17 07:27	08/02/17 11:25	ACM

Cp

²Tc

³Ss

⁴Cn

⁵Sr

⁶Qc

⁷Gl

⁸Al

⁹Sc



All sample aliquots were received at the correct temperature, in the proper containers, with the appropriate preservatives, and within method specified holding times. All MDL (LOD) and RDL (LOQ) values reported for environmental samples have been corrected for the dilution factor used in the analysis. All Method and Batch Quality Control are within established criteria except where addressed in this case narrative, a non-conformance form or properly qualified within the sample results. By my digital signature below, I affirm to the best of my knowledge, all problems/anomalies observed by the laboratory as having the potential to affect the quality of the data have been identified by the laboratory, and no information or data have been knowingly withheld that would affect the quality of the data.

Daphne Richards
Technical Service Representative

- Cp
- ²Tc
- ³Ss
- ⁴Cn
- ⁵Sr
- ⁶Qc
- ⁷Gl
- ⁸Al
- ⁹Sc



Total Solids by Method 2540 G-2011

Analyte	Result	Qualifier	Dilution	Analysis date / time	Batch
Total Solids	95.8		1	07/27/2017 08:54	WG1003014

Wet Chemistry by Method 9056A

Analyte	Result (dry)	Qualifier	RDL (dry)	Dilution	Analysis date / time	Batch
Chloride	43.4		10.4	1	07/27/2017 15:15	WG1003210

Volatile Organic Compounds (GC) by Method 8015/8021

Analyte	Result (dry)	Qualifier	RDL (dry)	Dilution	Analysis date / time	Batch
Benzene	ND		0.000522	1	07/28/2017 06:31	WG1003354
Toluene	ND		0.00522	1	07/28/2017 06:31	WG1003354
Ethylbenzene	ND		0.000522	1	07/28/2017 06:31	WG1003354
Total Xylene	ND		0.00157	1	07/28/2017 06:31	WG1003354
TPH (GC/FID) Low Fraction	ND		0.104	1	07/28/2017 06:31	WG1003354
(S) a,a,a-Trifluorotoluene(FID)	91.7		77.0-120		07/28/2017 06:31	WG1003354
(S) a,a,a-Trifluorotoluene(PID)	99.9		75.0-128		07/28/2017 06:31	WG1003354

Semi-Volatile Organic Compounds (GC) by Method 8015

Analyte	Result (dry)	Qualifier	RDL (dry)	Dilution	Analysis date / time	Batch
C10-C28 Diesel Range	ND		4.18	1	08/02/2017 11:25	WG1004541
C28-C40 Oil Range	ND		4.18	1	08/02/2017 11:25	WG1004541
(S) o-Terphenyl	86.8		18.0-148		08/02/2017 11:25	WG1004541

- 1 Cp
- 2 Tc
- 3 Ss
- 4 Cn
- 5 Sr
- 6 Qc
- 7 Gl
- 8 Al
- 9 Sc

WG1003014

Total Solids by Method 2540 G-2011

QUALITY CONTROL SUMMARYL924965-01

Method Blank (MB)

(MB) R3236855-1 07/27/17 08:54

Analyte	MB Result %	<u>MB Qualifier</u>	MB MDL %	MB RDL %
Total Solids	0.000400			

L924819-03 Original Sample (OS) • Duplicate (DUP)

(OS) L924819-03 07/27/17 08:54 • (DUP) R3236855-3 07/27/17 08:54

Analyte	Original Result %	DUP Result %	Dilution	DUP RPD %	<u>DUP Qualifier</u>	DUP RPD Limits %
Total Solids	92.9	95.2	1	2.39		5

Laboratory Control Sample (LCS)

(LCS) R3236855-2 07/27/17 08:54

Analyte	Spike Amount %	LCS Result %	LCS Rec. %	Rec. Limits %	<u>LCS Qualifier</u>
Total Solids	50.0	50.0	100	85.0-115	

ACCOUNT:
XTO Energy - San Juan Division

PROJECT:

SDG:
L924965

DATE/TIM
08/03/17 1

WG1003210

Wet Chemistry by Method 9056A

QUALITY CONTROL SUMMARYL924965-01

Method Blank (MB)

(MB) R3236671-1 07/27/17 12:42

Analyte	MB Result mg/kg	MB Qualifier	MB MDL mg/kg	MB RDL mg/kg
Chloride	0.976	J	0.795	10.0

L924912-02 Original Sample (OS) • Duplicate (DUP)

(OS) L924912-02 07/27/17 14:30 • (DUP) R3236671-6 07/27/17 14:39

Analyte	Original Result (dry) mg/kg	DUP Result (dry) mg/kg	Dilution	DUP RPD %	DUP Qualifier	DUP RPD Limits %
Chloride	60.2	55.6	1	8		15

Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) R3236671-2 07/27/17 12:51 • (LCSD) R3236671-3 07/27/17 13:00

Analyte	Spike Amount mg/kg	LCS Result mg/kg	LCSD Result mg/kg	LCS Rec. %	LCSD Rec. %	Rec. Limits %	LCS Qualifier	LCSD Qualifier	RPD %	RPD Limits %
Chloride	200	211	215	105	108	80-120			2	15

L924912-01 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L924912-01 07/27/17 14:03 • (MS) R3236671-4 07/27/17 14:12 • (MSD) R3236671-5 07/27/17 14:21

Analyte	Spike Amount (dry) mg/kg	Original Result (dry) mg/kg	MS Result (dry) mg/kg	MSD Result (dry) mg/kg	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	R %
Chloride	562	52.2	625	638	102	104	1	80-120			2

ACCOUNT:
XTO Energy - San Juan Division

PROJECT:

SDG:
L924965

DATE/TIM
08/03/17 1

Method Blank (MB)

(MB) R3236985-5 07/28/17 01:20

Analyte	MB Result mg/kg	MB Qualifier	MB MDL mg/kg	MB RDL mg/kg
Benzene	U		0.000120	0.000500
Toluene	0.000657	J	0.000150	0.00500
Ethylbenzene	0.000246	J	0.000110	0.000500
Total Xylene	U		0.000460	0.00150
TPH (GC/FID) Low Fraction	U		0.0217	0.100
(S) a,a,a-Trifluorotoluene(FID)	94.3			77.0-120
(S) a,a,a-Trifluorotoluene(PID)	103			75.0-128

Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) R3236985-1 07/27/17 23:06 • (LCSD) R3236985-2 07/27/17 23:29

Analyte	Spike Amount mg/kg	LCS Result mg/kg	LCSD Result mg/kg	LCS Rec. %	LCSD Rec. %	Rec. Limits %	LCS Qualifier	LCSD Qualifier	RPD %	RPD Limits %
Benzene	0.0500	0.0538	0.0538	108	108	71.0-121			0.0500	20
Toluene	0.0500	0.0556	0.0535	111	107	72.0-120			3.91	20
Ethylbenzene	0.0500	0.0536	0.0524	107	105	76.0-121			2.25	20
Total Xylene	0.150	0.159	0.153	106	102	75.0-124			3.72	20
(S) a,a,a-Trifluorotoluene(FID)				93.8	94.4	77.0-120				
(S) a,a,a-Trifluorotoluene(PID)				102	102	75.0-128				

Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) R3236985-3 07/28/17 00:13 • (LCSD) R3236985-4 07/28/17 00:35

Analyte	Spike Amount mg/kg	LCS Result mg/kg	LCSD Result mg/kg	LCS Rec. %	LCSD Rec. %	Rec. Limits %	LCS Qualifier	LCSD Qualifier	RPD %	RPD Limits %
TPH (GC/FID) Low Fraction	5.50	5.41	5.19	98.3	94.3	70.0-136			4.15	20
(S) a,a,a-Trifluorotoluene(FID)				101	100	77.0-120				
(S) a,a,a-Trifluorotoluene(PID)				111	111	75.0-128				

L924551-05 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L924551-05 07/28/17 05:02 • (MS) R3236985-6 07/28/17 05:24 • (MSD) R3236985-7 07/28/17 05:46

Analyte	Spike Amount mg/kg	Original Result mg/kg	MS Result mg/kg	MSD Result mg/kg	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	R %
Benzene	0.0500	ND	1.08	0.992	86.1	79.1	25	10.0-146			8
Toluene	0.0500	ND	1.09	1.00	87.1	79.6	25	10.0-143			8
Ethylbenzene	0.0500	ND	1.17	1.07	93.3	85.2	25	10.0-147			8
Total Xylene	0.150	ND	3.46	3.16	91.8	83.8	25	10.0-149			9
(S) a,a,a-Trifluorotoluene(FID)					95.4	96.4		77.0-120			

ACCOUNT:
XTO Energy - San Juan Division

PROJECT:

SDG:
L924965

DATE/TIM
08/03/17 1

L924551-05 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L924551-05 07/28/17 05:02 • (MS) R3236985-6 07/28/17 05:24 • (MSD) R3236985-7 07/28/17 05:46

Analyte	Spike Amount mg/kg	Original Result mg/kg	MS Result mg/kg	MSD Result mg/kg	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	R %
(S) a,a,a-Trifluorotoluene(PID)					104	104		75.0-128			

L925055-01 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L925055-01 07/28/17 07:37 • (MS) R3236985-8 07/28/17 07:59 • (MSD) R3236985-9 07/28/17 08:21

Analyte	Spike Amount mg/kg	Original Result mg/kg	MS Result mg/kg	MSD Result mg/kg	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	R %
TPH (GC/FID) Low Fraction	5.50	190	545	504	64.5	57.0	100	10.0-147			7
(S) a,a,a-Trifluorotoluene(FID)					97.1	97.5		77.0-120			
(S) a,a,a-Trifluorotoluene(PID)					109	109		75.0-128			

ACCOUNT:
XTO Energy - San Juan Division

PROJECT:

SDG:
L924965

DATE/TIM
08/03/17 1

Method Blank (MB)

(MB) R3237968-1 08/02/17 10:44

Analyte	MB Result mg/kg	MB Qualifier	MB MDL mg/kg	MB RDL mg/kg
C10-C28 Diesel Range	U		1.61	4.00
C28-C40 Oil Range	U		0.274	4.00
(S) o-Terphenyl	91.0			18.0-148

Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) R3237968-2 08/02/17 10:58 • (LCSD) R3237968-3 08/02/17 11:12

Analyte	Spike Amount mg/kg	LCS Result mg/kg	LCSD Result mg/kg	LCS Rec. %	LCSD Rec. %	Rec. Limits %	LCS Qualifier	LCSD Qualifier	RPD %	RPD Limits %
C10-C28 Diesel Range	60.0	45.4	44.7	75.7	74.6	50.0-150			1.48	20
(S) o-Terphenyl				88.7	88.9	18.0-148				

ACCOUNT:

XTO Energy - San Juan Division

PROJECT:

SDG:

L924965

DATE/TIM

08/03/17 1



Abbreviations and Definitions

SDG	Sample Delivery Group.
MDL	Method Detection Limit.
RDL (dry)	Reported Detection Limit.
RDL	Reported Detection Limit.
ND	Not detected at the Reporting Limit (or MDL where applicable).
U	Not detected at the Reporting Limit (or MDL where applicable).
RPD	Relative Percent Difference.
(dry)	Results are reported based on the dry weight of the sample. [this will only be present on a dry report basis for soils].
Original Sample	The non-spiked sample in the prep batch used to determine the Relative Percent Difference (RPD) from a quality control sample. The Original Sample may not be included within the reported SDG.
(S)	Surrogate (Surrogate Standard) - Analytes added to every blank, sample, Laboratory Control Sample/Duplicate and Matrix Spike/Duplicate; used to evaluate analytical efficiency by measuring recovery. Surrogates are not expected to be detected in all environmental media.
Rec.	Recovery.
Qualifier	Description
J	The identification of the analyte is acceptable; the reported value is an estimate.

Cp
² Tc
³ Ss
⁴ Cn
⁵ Sr
⁶ Qc
⁷ Gl
⁸ Al
⁹ Sc

ESC LAB SCIENCES
Cooler Receipt Form

Client:	XTORNM	SDG#	L924
Cooler Received/Opened On:	7/26 /2017	Temperature:	1.9
Received By: Marina Malone			
Signature: <i>Marina Malone</i>			

Receipt Check List	NP	Yes
COC Seal Present / Intact?	✓	
COC Signed / Accurate?		✓
Bottles arrive intact?		✓
Correct bottles used?		✓
Sufficient volume sent?		✓
If Applicable		
VOA Zero headspace?		
Preservation Correct / Checked?		

Hoekstra, Kurt

From: Hoekstra, Kurt
Sent: Thursday, July 20, 2017 9:51 AM
To: Smith, Cory, EMNRD; Fields, Vanessa, EMNRD (Vanessa.Fields@state.nm.us); Whitney Thomas (l1thomas@blm.gov)
Cc: McDaniel, James (James_McDaniel@xtoenergy.com); Hixon, Logan
Subject: 72 hour notification BGT Closure Butte # 2

Mr. Smith, Ms. Fields, Ms. Thomas

Please accept this email as the required 72 hour notification for BGT closure activities at the Butte # 2 well site API # (30-045-33889) located in Section 18, Township 30N, Range 13W, San Juan County, New Mexico. This BGT is being closed due to P&A of this well site . Work is tentatively scheduled for Monday 7-24-2017 at approximately 10:00 am. At that time XTO will collect a closure sample for the BGT cellar.

Thank you for your time in regards to this matter.

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

Hoekstra, Kurt

From: Hoekstra, Kurt
Sent: Thursday, July 20, 2017 10:02 AM
To: Whitney Thomas (l1thomas@blm.gov)
Cc: McDaniel, James (James_McDaniel@xtoenergy.com); Hixon, Logan
Subject: BLM Landowner Notification Butte # 2

Ms. Thomas,

Re: Butte # 2

API # 30-045-33889, Unit C, Section 18, Township 30N, Range 13W, San Juan County, New Mexico

This submittal is pursuant to Rule 19.15.17.13 requiring operators to notify surface owners of the closure of a below grade tank pit. XTO Energy, Inc. (XTO) is hereby providing written documentation of our proposal to close the below grade tank pit associated with the above mentioned well site by excavation and removal.

Should you have questions or require additional information, please feel free to contact me at your convenience at (505) 333-3100. Thank you for your time in regards to this matter.

Respectfully Submitted,

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



Division: Denver
 Dates: 6/1/2008-8/1/2017
 Type: RouteStop
 Type Value: BUTTE 002

Well Below Grade Tank Inspection

Route Name	StopName	Pumper	Foreman	Well Name	API Well Number	Section	Range	Township
DEN NM Run 70	BUTTE 002	Cardenas, Jacinto	Durham, Ken	BUTTE 02	3004533889	18	13W	30N

Inspector Name	Record Date	Inspection Time	Visible Liner Tears	Visible Liner Tears	Visible Tank Leak Overflow	Collection Of Surface Run	Visible Layer Oil	Visible Leak	Freeboard Est FT	Pit Location	Pit Type	Notes
bp	8/7/2008	02:00	No	No	No	No	No	No	4			new no liner
bp	10/7/2008	01:00	No	No	No	No	No	No	4			new no liner
bp	11/10/2008	03:00	No	No	No	No	No	No	4			new no liner
bp	12/17/2008	04:00	No	No	No	No	No	No	4			new no liner
bp	1/19/2009	04:22	No	No	No	No	No	No	4			new no liner
bp	2/2/2009	02:00	No	No	No	No	No	No	4			new no liner
Dustin Jensen	5/3/2009	02:55	No	No	No	No	No	No	6	Compressor	Below Ground	pit ok Dj
Dustin Jensen	6/17/2009	02:00	No	No	No	No	No	No	6	Compressor	Below Ground	pit ok Dj
Dustin Jensen	7/4/2009	11:10	No	No	No	No	No	No	6	Compressor	Below Ground	pit ok Dj
Dustin Jensen	10/16/2009	09:20	No	No	No	No	No	No	6	Compressor	Below Ground	pit ok Dj
Dustin Jensen	11/30/2009	03:00	No	No	No	No	No	No	6	Compressor	Below Ground	pit ok Dj
Dustin Jensen	3/2/2010	10:15	No	No	No	No	No	No	6	Compressor	Below Ground	pit ok Dj
Dustin Jensen	4/29/2010	08:45	No	No	No	No	No	No	6	Compressor	Below Ground	pit ok Dj
Dustin Jensen	6/12/2010	10:45	No	No	No	No	No	No	6	Compressor	Below Ground	pit ok Dj
Dustin Jensen	9/7/2010	08:45	No	No	No	No	No	No	6	Compressor	Below Ground	pit ok Dj
Dustin Jensen	10/6/2010	12:35	No	No	No	No	No	No	6	Compressor	Below Ground	pit ok Dj
Dustin Jensen	11/5/2010	08:30	No	No	No	No	No	No	6	Compressor	Below Ground	pit ok Dj
Dustin Jensen	12/13/2010	01:45	No	No	No	No	No	No	6	Compressor	Below Ground	pit ok Dj
Dustin Jensen	1/30/2011	02:45	No	No	No	No	No	No	6	Compressor	Below Ground	pit ok Dj
Dustin Jensen	2/20/2011	08:30	No	No	No	No	No	No	6	Compressor	Below Ground	pit ok Dj
Dustin Jensen	3/23/2011	10:00	No	No	No	No	No	No	6	Compressor	Below Ground	pit is mt
Dustin Jensen	4/1/2011	11:30	No	No	No	No	No	No	6	Compressor	Below Ground	pit is mt
Dustin Jensen	8/3/2011	09:00	No	No	No	No	No	No	6	Compressor	Below Ground	pit is mt
Dustin Jensen	9/29/2011	02:15	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Dustin Jensen	10/11/2011	09:15	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Dustin Jensen	12/14/2011	09:30	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Dustin Jensen	1/3/2012	09:45	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	10/25/2012	03:30	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	11/23/2012	02:55	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	12/28/2012	03:10	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	1/31/2013	09:30	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	2/22/2013	02:55	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	3/26/2013	01:55	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	4/23/2013	09:50	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	5/22/2013	02:20	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	6/19/2013	12:00	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	7/24/2013	10:00	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	8/22/2013	01:25	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	9/26/2013	02:25	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	10/31/2013	10:45	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	12/17/2013	03:00	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	1/24/2014	11:00	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	3/21/2014	03:15	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	4/25/2014	03:00	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	5/22/2014	02:00	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	6/30/2014	03:00	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	7/21/2014	11:00	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	8/22/2014	03:00	No	No	No	No	No	No	6	Compressor	Below Ground	well ina
Jacinto Cardenas	7/27/2017	08:40	No	No	No	No	Yes	No	4		Below Ground	0

January 27, 2015

Mr. Cory Smith
Oil Conservation Division
1000 Rio Brazos Rd.
Aztec, New Mexico 87410

Email: cory.smith@state.nm.us
Phone (505) 334-6178 Ext 115

RE: VARIANCE REQUEST FOR 19.15.17 NMAC TABLE I AND TABLE II

Mr. Smith,

Please accept this letter as a variance request as outlined in 19.15.17.15(A) NMAC. XTO Energy would like to request the replacement of USEPA Method 418.1 for the analysis of Total Petroleum Hydrocarbons (TPH) for USEPA Method 8015M, measuring carbon ranges C6-C36, for all sampling associated with closures and confirmations samples in relation to 19.15.17 NMAC, both in Table I and Table II (2103) and the 'pit rule' passed in 2008.

XTO Energy is requesting this variance on the grounds that USEPA Method 418.1 is an outdated analytical method that reports a full range of hydrocarbons from C₈ through C₄₀. (*Reference: American Petroleum Institute*). The attached table demonstrates the carbon ranges, and the typical hydrocarbon products that can be found in those ranges. As you can see, lube oil ranges from C₂₈-C₃₅. Analytical Method USEPA 418.1 extends past lube oils from C₃₅ through C₄₀. This range of hydrocarbons is above the range that can reasonably be expected to be found in our field in both drilling pits and beneath below grade tanks. USEPA Method 8015M (GRO/DRO + extended analysis) will report hydrocarbons ranging from C₆-C₁₀ for GRO, C₁₀-C₂₈ for DRO, and C₂₈-C₃₆ for extended analysis. This information was provided by Environmental Science Corporation Laboratories. As the information demonstrates, the 8015M analytical method reports as low as C₆, reporting lower than USEPA Method 418.1. Utilizing analytical method 8015M, lighter range hydrocarbons will be reported instead of higher range, heavy hydrocarbons that may not be reasonably expected to be found in our field. Utilization of USEPA Method 8015M will better protect groundwater resources by identifying lighter, more mobile hydrocarbons that USEPA Method 418.1 cannot identify. The heavier range hydrocarbons, C₃₆-C₄₀, that are not identified by USEPA Method 8015M are not a mobile form of hydrocarbon, and are not a threat to human health and the environment. With your acceptance of this variance request, XTO Energy will begin utilizing USEPA Method 8015M in place of USEPA Method 418.1 for all sampling activities associated with 19.15.17 NMAC, both from the rules passed in 2008 and 2013.

Respectfully Submitted,

James McDaniel, CHMM #15676
EH&S Supervisor
XTO Energy, Inc.
Western Division

Carbon Ranges of Typical Hydrocarbons

Hydrocarbon	Carbon Range
Condensate	C2-C12
Aromatics	C5-C7
Gasoline	C7-C11
Kerosene	C6-C16
Diesel Fuel	C8-C21
Fuel Oil #1	C9-C16
Fuel Oil #2	C11-C20
Heating Oil	C14-C20
Lube Oil	C28-C35

