District I
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 April 3, 2017

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.

16297

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 Road 3100 Aztec, New Mexico 87410
Facility or well name: Florance D # 10B
API Number: 30-045-31086 OCD Permit Number:
U/L or Qtr/Qtr A Section 17 Township 27N Range 8W County: San Juan
Center of Proposed Design: Latitude 36.58083 Longitude -107.69806 NAD: 83
Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

NMOCD
MAR 14 2018
DISTRICT III

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
* Release Confirmed Additional C-141 Required.
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 Visable 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 high, steel mesh field fence (hogwire) with pipe top rail

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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.
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 H_2S, 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	☐ Yes ☐ No ☐ 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	☐ Yes ☐ No ☐ 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	☐ Yes ☐ No ☐ 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	☐ 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 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	☐ Yes ☐ No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ 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
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): _____ 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:** 3/29/18

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:** 12-27-2017

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: Kurt Hoekstra Date: 3-7-2018

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

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

Lease Name: Florance D # 10B
API No.: 30-045-31086
Description: Unit A, Section 17, Township 27N, Range 8W, 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: February 26, 2018

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: February 26,2018

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 an integrity failure of the pit tank.

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	10	**< 100 ug/kg**
BTEX	EPA SW-846 8021B or 8260B	50	**< 500 ug/kg**
TPH	EPA 8015M	5000	**< 95 mg/kg**
Chloride	EPA Method 300	250	**113 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 integrity failure of the pit tank a 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 was sampled and results were below NMOCD standards for this site XTO has Registered the below grade tank that will be installed into the existing cellar.

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 February 19th, 2018; see attached email printout.

The surface owner shall be notified of XTO's proposal to close the BGT as per the approved closure plan.
The surface owner was notified on February 19th, 2018 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 will be backfilled to match these specifications when the registered BGT cellar is closed.

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 per BLM, OCD specifications

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 BLM, OCD specifications**
    iii. Inspection reports; **attached**
    iv. Confirmation sampling analytical results; **attached**
    v. Disposal facility name(s) and permit number(s); **see above**
    vi. Soil backfilling and cover installation; **per BLM, OCD Specifications**
    vii. Re-vegetation application rates and seeding techniques, (or approved alternative to re-vegetation requirements if applicable); **per BLM, OCD specifications**
    viii. Photo documentation of the site reclamation. **attached**

District I
1625 N. French Dr., Hobbs, NM 88240
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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: Florance D # 10B	Facility Type: Gas Well (Blanco Mesaverde, Otero Chacra)

Surface Owner: Federal	Mineral Owner	API No.: 30-045-31086

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
A	17	27N	8W	415	FNL	670	FEL	San Juan

Latitude 36.58083 **Longitude** -107.69806

NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: Unknown	Volume Recovered: None
Source of Release: Pit Tank	Date and Hour of Occurrence: Time: Unknown	Date and Hour of Discovery: 2-14-2018 in the afternoon
Was Immediate Notice Given? ☐ Yes ☒ No ☐ Not Required	If YES, To Whom?	
By Whom? N/A	Date and Hour:	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* On Wednesday, 2-14-2018 an XTO construction foreman found water inside the pit tank cellar on the Florance D # 10B location during maintenance activities . An XTO construction crew washed the pit tank and found that the pit tank had an integrity failure and leaked produced water into the pit tank cellar. The spill was contained within the wood cellar and never left location. The site was then ranked according to the NMOCD Guidelines for the Remediation of Leaks, Spills and Releases. The site was ranked a 0 due to an estimated depth to groundwater of greater than 100 feet, greater than 1000 feet from a water source, and distance to an arroyo greater than1000 feet. This set the closure standard to 5000 ppm TPH, 10 ppm benzene, and 50 ppm total BTEX.

Describe Area Affected and Cleanup Action Taken. *A release has been confirmed based on an integrity failure of the pit tank.

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 "Initial 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: Kurt Hoekstra	OIL CONSERVATION DIVISION 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 ☐
Date: 3-7-2018 Phone: 505-333-3100		

* Attach Additional Sheets If Necessary

#NRCS 1808841899 2

Hoekstra, Kurt

From: Hoekstra, Kurt
Sent: Monday, February 19, 2018 9:17 AM
To: Smith, Cory, EMNRD; Fields, Vanessa, EMNRD (Vanessa.Fields@state.nm.us); Whitney Thomas (l1thomas@blm.gov)
Cc: Mulnix, John; Trujillo, Marcos; Dawes, Thomas; Woolley, Jeff; Weaver, John; Hixon, Logan; Christianson, Bruce; Rensink, Ryan; Barnhill, Matthew; Karlin, Michael; Martin Nee (Martin_Nee@xtoenergy.com)
Subject: 72 hour notice for BGT's at the Florance D # 10B and Bolack C LS # 7

Mr. Smith, Ms. Fields and Ms. Thomas ,
Please accept this email as the required 72 hour notification for BGT closure activities at the following two(2) well sites:
Florance D # 10B well site API # (30-045-31086) located in Section 17A, Township 27N, Range 8W, San Juan County, New Mexico.
Bolack C LS # 7 well site API # (30-045-06143) located in Section 33E, Township 27N, Range 8W, San Juan County, New Mexico
During maintenance activities holes were discovered in these below grade tanks.
Work is tentatively scheduled for Thursday February 22nd , 2018 at approximately 10:00 am.
The approved closure plan only, has been received from Santa Fe.

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**

XTO ENERGY a subsidiary of ExxonMobil

Report generated on 3/7/2018 12:27:26 PM

Division: Denver

Dates: 6/1/2008-3/6/2018

Type: RouteStop

Type Value: FLORANCE D 010B

Well Below Grade Tank Inspection

Route Name	StopName	Pumper	Foreman	Well Name	API Well Number	Section	Range	Towns				
DEN NM Run 41	FLORANCE D 010B	Bryan, Thomas	Mulnix, John	FLORANCE D 10B	3004531086	17	8W	27N				

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
PETER SCHMIDT	7/22/2008	10:19	No	No	No	Yes	Yes	No	5			PRODUCTION PIT
SHAWN ERRETT	8/19/2008	10:15	No	No	No	Yes	Yes	No	5			PRODUCTION PIT
SHAWN ERRETT	9/2/2008	09:53	No	No	No	Yes	Yes	No	5			PRODUCTION PIT
JC	10/14/2008	11:40	No	No	No	Yes	Yes	No	5	Well Water Pit	Below Ground	PRODUCTION PIT
KEN ALLEN	11/14/2008	10:57	No	No	No	Yes	Yes	No	2	Well Water Pit	Below Ground	PRODUCTION PIT
SE	12/10/2008	13:20	No	No	No	Yes	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
KA	1/7/2009	09:18	No	No	No	Yes	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
ES	2/26/2009	12:10	No	No	No	Yes	Yes	No	5	Well Water Pit	Below Ground	PRODUCTION PIT
ES	3/24/2009	10:35	No	No	No	Yes	Yes	No	4	Well Water Pit	Below Ground	PRODUCTION PIT
ES	4/28/2009	10:55	No	No	No	Yes	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
ES	5/19/2009	12:10	No	No	No	Yes	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
ES	6/23/2009	09:35	No	No	No	Yes	Yes	No	4	Well Water Pit	Below Ground	PRODUCTION PIT
VM	7/22/2009	01:19	No	No	No	Yes	Yes	No	2	Well Water Pit	Below Ground	PRODUCTION PIT
ES	8/21/2009	12:55	No	No	No	Yes	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
ES	9/28/2009	10:15	No	No	No	Yes	Yes	No	2	Well Water Pit	Below Ground	PRODUCTION PIT
ES	10/27/2009	00:00	No	No	No	Yes	Yes	No	4	Well Water Pit	Below Ground	PRODUCTION PIT
ES	11/24/2009	10:30	No	No	No	Yes	Yes	No	5	Well Water Pit	Below Ground	PRODUCTION PIT

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
ES	12/29/2009	10:45	No	No	No	Yes	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
ES	1/28/2010	10:20	No	No	No	Yes	Yes	No	4	Well Water Pit	Below Ground	PRODUCTION PIT
ES	3/27/2010	10:00	No	No	No	Yes	Yes	No	2	Well Water Pit	Below Ground	PRODUCTION PIT
ds	4/16/2010	10:00	No	No	No	No	Yes	No	1	Well Water Pit	Below Ground	PRODUCTION PIT
es	5/14/2010	10:00	No	No	No	No	Yes	No	2	Well Water Pit	Below Ground	PRODUCTION PIT
es	6/10/2010	10:00	No	No	No	No	Yes	No	4	Well Water Pit	Below Ground	PRODUCTION PIT
es	7/15/2010	10:00	No	No	No	No	Yes	No	2	Well Water Pit	Below Ground	PRODUCTION PIT
es	8/12/2010	10:00	No	No	No	No	Yes	No	4	Well Water Pit	Below Ground	PRODUCTION PIT
es	9/14/2010	10:00	No	No	No	No	Yes	No	5	Well Water Pit	Below Ground	PRODUCTION PIT
es	10/13/2010	10:00	No	No	No	No	Yes	No	2	Well Water Pit	Below Ground	PRODUCTION PIT
es	11/8/2010	10:00	No	No	No	No	Yes	No	1	Well Water Pit	Below Ground	PRODUCTION PIT
es	12/16/2010	10:00	No	No	No	No	Yes	No	2	Well Water Pit	Below Ground	PRODUCTION PIT
es	1/12/2011	10:00	No	No	No	No	Yes	No	5	Well Water Pit	Below Ground	PRODUCTION PIT
es	2/10/2011	10:00	No	No	No	No	Yes	No	2	Well Water Pit	Below Ground	PRODUCTION PIT
es	3/16/2011	10:00	No	No	No	No	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
twt	1/26/2012	10:00	No	No	No	No	Yes	No	2	Well Water Pit	Below Ground	PRODUCTION PIT
twt	2/22/2012	11:00	No	No	No	No	Yes	No	2	Well Water Pit	Below Ground	PRODUCTION PIT
twt	3/8/2012	11:53	No	No	No	No	Yes	No	5	Well Water Pit	Below Ground	PRODUCTION PIT
twt	4/23/2012	12:48	No	No	No	No	Yes	No	5	Well Water Pit	Below Ground	PRODUCTION PIT
twt	5/17/2012	10:27	No	No	No	No	Yes	No	4	Well Water Pit	Below Ground	PRODUCTION PIT
twt	6/18/2012	10:21	No	No	No	No	Yes	No	1	Well Water Pit	Below Ground	PRODUCTION PIT
twt	7/4/2012	12:10	No	No	No	No	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
twt	8/9/2012	11:23	No	No	No	No	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
twt	9/18/2012	10:12	No	No	No	No	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
twt	10/12/2012	09:30	No	No	No	No	Yes	No	4	Well Water Pit	Below Ground	PRODUCTION PIT
twt	11/26/2012	01:13	No	No	No	No	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
twt	12/7/2012	02:50	No	No	No	No	Yes	No	2	Well Water Pit	Below Ground	PRODUCTION PIT
twt	1/22/2013	12:19	No	No	No	No	Yes	No	2	Well Water Pit	Below Ground	PRODUCTION PIT
twt	2/6/2013	01:28	No	No	No	No	Yes	No	2	Well Water Pit	Below Ground	PRODUCTION PIT
twt	3/27/2013	02:20	No	No	No	No	Yes	No	4	Well Water Pit	Below Ground	PRODUCTION PIT
twt	4/24/2013	02:20	No	No	No	No	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
twt	5/14/2013	02:20	No	No	No	No	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
twt	6/18/2013	11:13	No	No	No	No	Yes	No	2	Well Water Pit	Below Ground	PRODUCTION PIT
twt	7/31/2013	10:16	No	No	No	No	Yes	No	4	Well Water Pit	Below Ground	PRODUCTION PIT

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
twt	8/19/2013	10:16	No	No	No	No	Yes	No	4	Well Water Pit	Below Ground	PRODUCTION PIT
twt	9/18/2013	10:30	No	No	No	No	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
twt	10/14/2013	10:00	No	No	No	No	Yes	No	4	Well Water Pit	Below Ground	PRODUCTION PIT
twt	11/13/2013	12:00	No	No	No	No	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
twt	12/2/2013	09:00	No	No	No	No	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
twt	1/31/2014	12:19	No	No	No	No	Yes	No	4	Well Water Pit	Below Ground	PRODUCTION PIT
twt	2/28/2014	12:19	No	No	No	No	Yes	No	4	Well Water Pit	Below Ground	PRODUCTION PIT
twt	3/11/2014	12:19	No	No	No	No	Yes	No	4	Well Water Pit	Below Ground	PRODUCTION PIT
twt	4/15/2014	12:19	No	No	No	No	Yes	No	4	Well Water Pit	Below Ground	PRODUCTION PIT
twt	5/9/2014	02:00	No	No	No	No	Yes	No	4	Well Water Pit	Below Ground	PRODUCTION PIT
twt	8/29/2014	10:45	No	No	No	No	Yes	No	4	Well Water Pit	Below Ground	PRODUCTION PIT
twt	9/19/2014	13:32	No	No	No	No	Yes	No	1	Well Water Pit	Below Ground	PRODUCTION PIT
twt	10/7/2014	13:34	No	No	No	No	Yes	No	4	Well Water Pit	Below Ground	PRODUCTION PIT
DY	4/11/2016	13:34	No	No	No	No	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
DY	5/17/2016	13:34	No	No	No	No	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
DY	7/19/2016	13:34	No	No	No	No	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
DY	8/16/2016	13:34	No	No	No	No	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
DY	9/13/2016	13:34	No	No	No	No	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
	3/4/2017	13:34	No	No	No	No	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT
	4/3/2017	13:34	No	No	No	No	Yes	No	3	Well Water Pit	Below Ground	PRODUCTION PIT

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Analytical Laboratory

Analytical Report

Report Summary

Client: XTO Energy Inc.

Chain Of Custody Number:

Samples Received: 2/22/2018 2:00:00PM

Job Number: 98031-0528

Work Order: P802041

Project Name/Location: Florance D # 10B

Report Reviewed By: _____ Date: 2/26/18

Walter Hinchman, Laboratory Director

_____ Date: 2/26/18

Tim Cain, Quality Assurance Officer

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

5796 US Highway 64, Farmington, NM 87401 Ph (505) 632-0615 Fx (505) 632-1865
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laboratory@envirotech-inc.com

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Analytical Laboratory

XTO Energy Inc.	Project Name:	Florance D # 10B	
382 CR 3100	Project Number:	98031-0528	**Reported:**
Aztec NM, 87410	Project Manager:	Kurt Hoekstra	26-Feb-18 16:10

Analyical Report for Samples

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
BGT Closure	P802041-01A	Solid	02/22/18	02/22/18	Glass Jar, 4 oz.

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XTO Energy Inc.	Project Name:	Florance D # 10B	
382 CR 3100	Project Number:	98031-0528	**Reported:**
Aztec NM, 87410	Project Manager:	Kurt Hoekstra	26-Feb-18 16:10

BGT Closure
P802041-01 (Solid)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Volatile Organics by EPA 8021									
Benzene	ND	100	ug/kg	1	1808020	02/22/18	02/22/18	EPA 8021B	
Toluene	ND	100	ug/kg	1	1808020	02/22/18	02/22/18	EPA 8021B	
Ethylbenzene	ND	100	ug/kg	1	1808020	02/22/18	02/22/18	EPA 8021B	
p,m-Xylene	ND	200	ug/kg	1	1808020	02/22/18	02/22/18	EPA 8021B	
o-Xylene	ND	100	ug/kg	1	1808020	02/22/18	02/22/18	EPA 8021B	
Total Xylenes	ND	100	ug/kg	1	1808020	02/22/18	02/22/18	EPA 8021B	
Total BTEX	ND	100	ug/kg	1	1808020	02/22/18	02/22/18	EPA 8021B	
Surrogate: 4-Bromochlorobenzene-PID		*97.2 %*		*50-150*	*1808020*	*02/22/18*	*02/22/18*	*EPA 8021B*	
Nonhalogenated Organics by 8015									
Gasoline Range Organics (C6-C10)	ND	20.0	mg/kg	1	1808020	02/22/18	02/22/18	EPA 8015D	
Diesel Range Organics (C10-C28)	ND	25.0	mg/kg	1	1808022	02/23/18	02/23/18	EPA 8015D	
Oil Range Organics (C28-C40+)	ND	50.0	mg/kg	1	1808022	02/23/18	02/23/18	EPA 8015D	
Surrogate: 1-Chloro-4-fluorobenzene-FID		*98.0 %*		*50-150*	*1808020*	*02/22/18*	*02/22/18*	*EPA 8015D*	
Surrogate: n-Nonane		*85.5 %*		*50-200*	*1808022*	*02/23/18*	*02/23/18*	*EPA 8015D*	
Anions by 300.0									
Chloride	113	20.0	mg/kg	1	1808023	02/23/18	02/23/18	EPA 300.0	

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XTO Energy Inc.	Project Name:	Florance D # 10B	
382 CR 3100	Project Number:	98031-0528	**Reported:**
Aztec NM, 87410	Project Manager:	Kurt Hockstra	26-Feb-18 16:10

Volatile Organics by EPA 8021 - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1808020 - Purge and Trap EPA 5030A										
Blank (1808020-BLK1)				Prepared & Analyzed: 22-Feb-18						
Benzene	ND	100	ug/kg							
Toluene	ND	100	"							
Ethylbenzene	ND	100	"							
p,m-Xylene	ND	200	"							
o-Xylene	ND	100	"							
Total Xylenes	ND	100	"							
Total BTEX	ND	100	"							
Surrogate: 4-Bromochlorobenzene-PID	*7740*		"	*8000*		*96.8*	*50-150*			
LCS (1808020-BS1)				Prepared & Analyzed: 22-Feb-18						
Benzene	4830	100	ug/kg	5000		96.6	70-130			
Toluene	4770	100	"	5000		95.4	70-130			
Ethylbenzene	4800	100	"	5000		96.0	70-130			
p,m-Xylene	9590	200	"	10000		95.9	70-130			
o-Xylene	4720	100	"	5000		94.4	70-130			
Total Xylenes	14300	100	"	15000		95.4	70-130			
Surrogate: 4-Bromochlorobenzene-PID	*7860*		"	*8000*		*98.2*	*50-150*			
Matrix Spike (1808020-MS1)		**Source: P802041-01**		Prepared & Analyzed: 22-Feb-18						
Benzene	4960	100	ug/kg	5000	ND	99.2	54.3-133			
Toluene	4900	100	"	5000	ND	98.0	61.4-130			
Ethylbenzene	4930	100	"	5000	ND	98.6	61.4-133			
p,m-Xylene	9850	200	"	10000	ND	98.5	63.3-131			
o-Xylene	4850	100	"	5000	ND	97.0	63.3-131			
Total Xylenes	14700	100	"	15000	ND	98.0	63.3-131			
Surrogate: 4-Bromochlorobenzene-PID	*7870*		"	*8000*		*98.3*	*50-150*			
Matrix Spike Dup (1808020-MSD1)		**Source: P802041-01**		Prepared & Analyzed: 22-Feb-18						
Benzene	4630	100	ug/kg	5000	ND	92.6	54.3-133	6.81	20	
Toluene	4570	100	"	5000	ND	91.5	61.4-130	6.89	20	
Ethylbenzene	4600	100	"	5000	ND	92.0	61.4-133	6.87	20	
p,m-Xylene	9190	200	"	10000	ND	91.9	63.3-131	6.91	20	
o-Xylene	4540	100	"	5000	ND	90.9	63.3-131	6.49	20	
Total Xylenes	13700	100	"	15000	ND	91.6	63.3-131	6.77	20	
Surrogate: 4-Bromochlorobenzene-PID	*7920*		"	*8000*		*99.0*	*50-150*			

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Analytical Laboratory

XTO Energy Inc.	Project Name:	Florance D # 10B	
382 CR 3100	Project Number:	98031-0528	**Reported:**
Aztec NM, 87410	Project Manager:	Kurt Hoekstra	26-Feb-18 16:10

Nonhalogenated Organics by 8015 - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1808020 - Purge and Trap EPA 5030A										
Blank (1808020-BLK1)				Prepared & Analyzed: 22-Feb-18						
Gasoline Range Organics (C6-C10)	ND	20.0	mg/kg							
Surrogate: 1-Chloro-4-fluorobenzene-FID	*7.73*		"	*8.00*		*96.7*	*50-150*			
LCS (1808020-BS2)				Prepared & Analyzed: 22-Feb-18						
Gasoline Range Organics (C6-C10)	49.5	20.0	mg/kg	50.0		99.1	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	*8.12*		"	*8.00*		*102*	*50-150*			
Matrix Spike (1808020-MS2)		**Source: P802041-01**		Prepared & Analyzed: 22-Feb-18						
Gasoline Range Organics (C6-C10)	48.7	20.0	mg/kg	50.0	ND	97.4	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	*7.98*		"	*8.00*		*99.8*	*50-150*			
Matrix Spike Dup (1808020-MSD2)		**Source: P802041-01**		Prepared & Analyzed: 22-Feb-18						
Gasoline Range Organics (C6-C10)	48.7	20.0	mg/kg	50.0	ND	97.5	70-130	0.0919	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	*7.96*		"	*8.00*		*99.5*	*50-150*			

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Analytical Laboratory

XTO Energy Inc.	Project Name:	Florance D # 10B	
382 CR 3100	Project Number:	98031-0528	**Reported:**
Aztec NM, 87410	Project Manager:	Kurt Hoekstra	26-Feb-18 16:10

Nonhalogenated Organics by 8015 - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1808022 - DRO Extraction EPA 3570										
Blank (1808022-BLK1)				Prepared & Analyzed: 23-Feb-18						
Diesel Range Organics (C10-C28)	ND	25.0	mg/kg							
Oil Range Organics (C28-C40+)	ND	50.0	"							
Surrogate: n-Nonane	*46.8*		"	*50.0*		*93.5*	*50-200*			
LCS (1808022-BS1)				Prepared & Analyzed: 23-Feb-18						
Diesel Range Organics (C10-C28)	515	25.0	mg/kg	500		103	38-132			
Surrogate: n-Nonane	*45.2*		"	*50.0*		*90.3*	*50-200*			
Matrix Spike (1808022-MS1)	**Source: P802041-01**			Prepared & Analyzed: 23-Feb-18						
Diesel Range Organics (C10-C28)	519	25.0	mg/kg	500	ND	104	38-132			
Surrogate: n-Nonane	*43.7*		"	*50.0*		*87.4*	*50-200*			
Matrix Spike Dup (1808022-MSD1)	**Source: P802041-01**			Prepared & Analyzed: 23-Feb-18						
Diesel Range Organics (C10-C28)	526	25.0	mg/kg	500	ND	105	38-132	1.41	20	
Surrogate: n-Nonane	*44.2*		"	*50.0*		*88.3*	*50-200*			

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Analytical Laboratory

XTO Energy Inc.	Project Name:	Florance D # 10B	
382 CR 3100	Project Number:	98031-0528	**Reported:**
Aztec NM, 87410	Project Manager:	Kurt Hoekstra	26-Feb-18 16:10

Anions by 300.0 - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1808023 - Anion Extraction EPA 300.0/9056A										
Blank (1808023-BLK1)				Prepared & Analyzed: 23-Feb-18						
Chloride	ND	20.0	mg/kg							
LCS (1808023-BS1)				Prepared & Analyzed: 23-Feb-18						
Chloride	249	20.0	mg/kg	250		99.6	90-110			
Matrix Spike (1808023-MS1)		Source: P802041-01		Prepared & Analyzed: 23-Feb-18						
Chloride	377	20.0	mg/kg	250	113	106	80-120			
Matrix Spike Dup (1808023-MSD1)		Source: P802041-01		Prepared & Analyzed: 23-Feb-18						
Chloride	383	20.0	mg/kg	250	113	108	80-120	1.72	20	

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envirotech
Analytical Laboratory

XTO Energy Inc.	Project Name:	Florance D # 10B	
382 CR 3100	Project Number:	98031-0528	**Reported:**
Aztec NM, 87410	Project Manager:	Kurt Hoekstra	26-Feb-18 16:10

Notes and Definitions

DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
RPD	Relative Percent Difference

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RUSH

1092

XTO ENERGY
Western Division

Quote Number	Page 1 of 1	
XTO Contact: Kurt	XTO Contact Phone #: 505-486-9543	
Email Results to: Kurt, Logan		
Well Site/Location: Florance D# 10B	API Number: 30-045-31086	Saturday Delivery (Y / (N))
Collected By: Kurt	Samples on Ice: (Y) N	Turnaround: ___ Standard; X Next Day; ___ Two Day; ___ Three Day; ___ Same Day; Date Needed ___
Company: XTO	Test Reason: BGT Closure	
Signature: Kurt Hackler	Gray Areas for Lab Use Only!	

Analysis/Container: TPH 8015 - DRO - GRO - ORO; BTEX 8021; Chloride

Lab Information: P802041; WO 98031-0528

Office Abbreviations: Farmington = FAR; Durango = DUR; Bakken = BAK; Raton = RAT; Piceance = PC; Roosevelt = RSV; La Barge = LB; Orangeville = OV

Sample ID	Sample Name	Media	Date	Time	Preservative	No. of Conts.	TPH 8015	BTEX 8021	Chloride	Sample Number
Florance D#10B	BGT Cellar	S	2/22	11:00	On Ice	(1) Jar	X	X	X	1

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

Relinquished By: (Signature) Kurt Hackler	Date: 2-22-18	Time: 2:00	Received By: (Signature) Johanna Chee 2/22/18 2:00pm	Number of Bottles: 1	Sample Condition
Relinquished By: (Signature)	Date:	Time:		Temperature: 4.0°C	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

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.

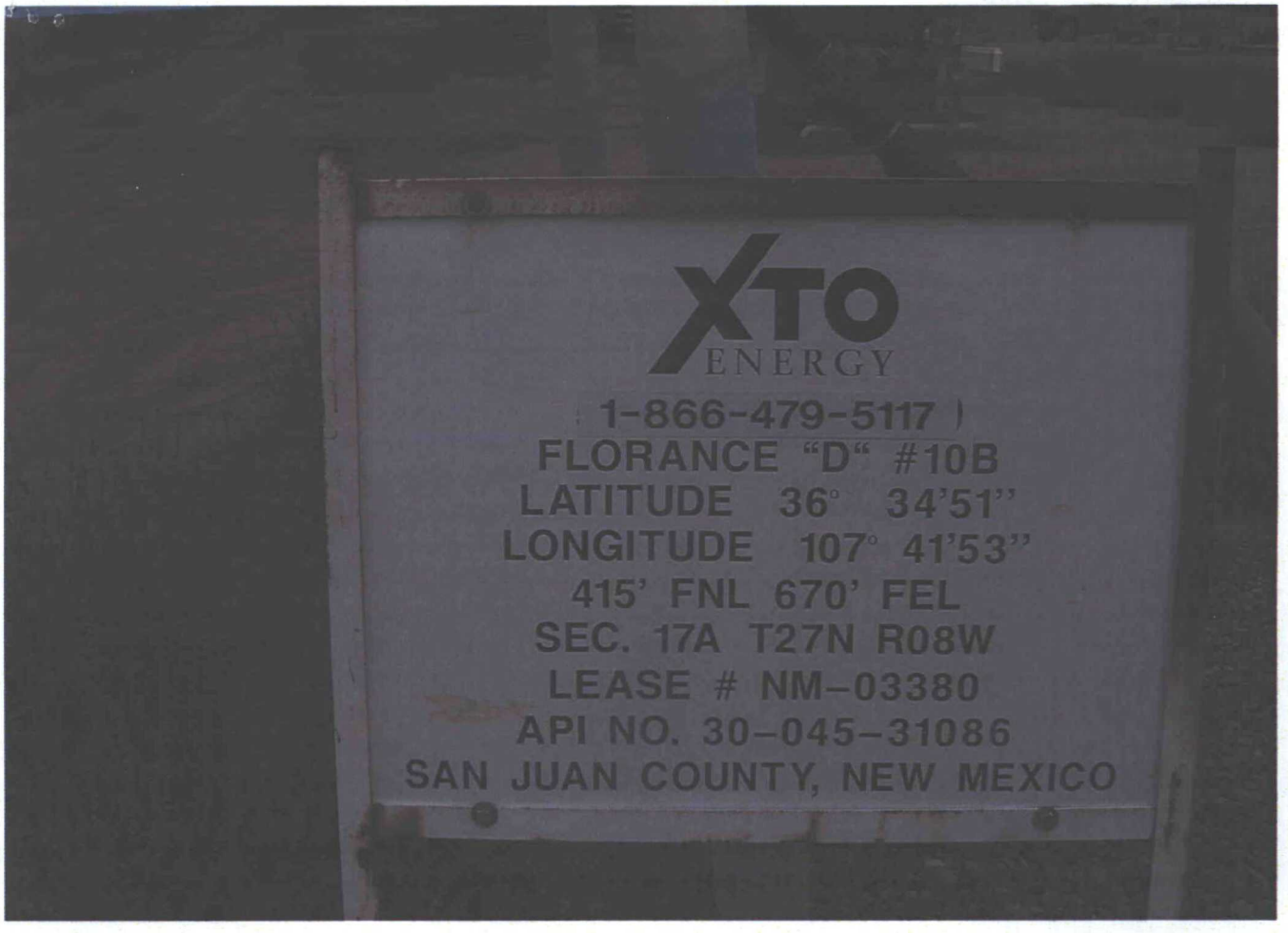
XTO Energy is requesting this variance on the grounds that USEPA Method 418.1 is an outdated analytical method that reports a full range of hydrocarbons from C_8 through C_{40}. (*Reference: American Petroleum Institute*). The attached table demonstrates the carbon ranges, and the typical hydrocarbon products that can be found in those ranges. As you can see, lube oil ranges from C_{28}-C_{35}. Analytical Method USEPA 418.1 extends past lube oils from C_{35} through C_{40}. 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 C_6-C_{10} for GRO, C_{10}-C_{28} for DRO, and C_{28}-C_{36} for extended analysis. This information was provided by Environmental Science Corporation Laboratories. As the information demonstrates, the 8015M analytical method reports as low as C_6, 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, C_{36}-C_{40}, 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


XTO
ENERGY
1-866-479-5117
FLORANCE "D" #10B
LATITUDE 36° 34'51"
LONGITUDE 107° 41'53"
415' FNL 670' FEL
SEC. 17A T27N R08W
LEASE # NM-03380
API NO. 30-045-31086
SAN JUAN COUNTY, NEW MEXICO