



December 12, 2024

New Mexico Oil Conservation Division

New Mexico Energy, Minerals, and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**Re: Closure Request
Nash Draw 8 Federal 001H SWD
Incident Number nAPP2426027074
Eddy County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of XTO Energy, Inc (XTO), has prepared this *Closure Request* to document the findings of a liner integrity inspection conducted at the Nash Draw 8 Federal 001H SWD (Site) following a release of produced water within a lined containment. Based on the liner integrity inspection activities, XTO is submitting this *Closure Request*, describing assessment activities that have occurred and requesting no further action and closure for Incident Number nAPP2426027074.

SITE DESCRIPTION AND RELEASE SUMMARY

The Site is located in Unit L, Section 08, Township 24 South, Range 30 East, in Eddy County, New Mexico (32.23145°, -103.90967°) and is associated with oil and gas exploration and production operations on Federal land managed by the Bureau of Land Management (BLM).

On September 14, 2024, a valve on a produced water surface pipeline failed resulting in the release of approximately 20 barrels (bbls) of produced water into a lined containment. A vacuum truck was immediately dispatched to the Site to recover free-standing fluid, and all released fluid was recovered. Following the release, the valve was replaced. XTO reported the release to the New Mexico Oil Conservation Division (NMOCD) via a Notification of Release (NOR) and submitted an Initial Release C-141 Application (C-141) on September 16, 2024. The release was assigned Incident Number nAPP2426027074.

SITE CHARACTERIZATION AND CLOSURE CRITERIA

The Site was characterized to determine the applicability of Table I Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29 (19.15.29) of the New Mexico Administrative Code (NMAC). Results from the characterization desktop review are presented below and potential Site receptors are identified on Figure 1.

Depth to groundwater at the Site is estimated to be greater than 100 feet below ground surface (bgs) based on a well drilled for the purpose of livestock watering. On December 31, 1963, a well permitted by New Mexico Office of the State Engineer (NMOSE) (C-2108), located approximately 420 feet south of the Site was drilled to a depth of 200 feet bgs, encountering groundwater at 186 feet bgs. All wells used to determine depth to groundwater are depicted on Figure 1. The Well Record and Log is included in Appendix A.

XTO Energy, Inc
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Based on the results of the Site Characterization, the following NMOCD Table I Closure Criteria (Closure Criteria) apply:

- Benzene: 10 milligrams per kilogram (mg/kg)
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg
- Total petroleum hydrocarbons (TPH): 100 mg/kg
- Chloride: 600 mg/kg

LINER INTEGRITY INSPECTION ACTIVITIES

A 48-hour advance notice of the liner inspection was submitted on September 19, 2024. On September 23, 2024, the lined containment was cleaned of all debris, power washed and inspected by Ensolum personnel and was determined to be operating as designed. Upon inspection, no rips, tears, holes, or damage were observed. The liner was determined to be sufficient, and all released fluids were recovered. A Site map showing the lined containment area is included in Figure 2. Photographic documentation of the inspection is included in Appendix B.

CLOSURE REQUEST

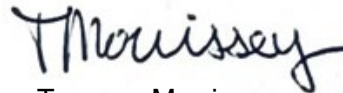
Liner integrity inspection activities were conducted following the release of 20 bbls of produced water within a lined containment at the Site. Following removal of all fluids and debris by cleaning the liner via power washer, a liner integrity inspection was conducted by Ensolum personnel on September 23, 2024. Upon inspection, no rips, tears, holes, or damage were observed, and the liner was determined to be operating as designed. The release was contained laterally by the lined containment walls. Based on initial response efforts and the liner operating as designed, XTO respectfully requests closure for Incident Number nAPP2426027074.

If you have any questions or comments, please contact Ms. Tacoma Morrissey at (337) 257-8307 or tmorrissey@ensolum.com.

Sincerely,
Ensolum, LLC



Kim Thomason
Senior Technician



Tacoma Morrissey
Assistant Principal

Cc: Colton Brown, XTO
Kaylan Dirkx, XTO
BLM



XTO Energy, Inc
Closure Request
Nash Draw 8 Federal 001H SWD

Appendices:

Figure 1	Site Receptor Map
Figure 2	Site Map
Appendix A	Referenced Well Records
Appendix B	Photographic Log



FIGURES

Site Receptor Map

XTO Energy, Inc.
Nash Draw 8 Federal 001H SWD
Incident Number: NAPP2426027074
Unit L, Sec 08, T24S, R30E
Eddy County, New Mexico

FIGURE

1

Legend

--- Lined Containment Area



0 15 30 60
Feet

Sources: Environmental Systems Research Institute (ESRI)



Site Map

XTO Energy, Inc.
Nash Draw 8 Federal 001H SWD
Incident Number: NAPP2426027074
Unit L, Sec 08, T24W, R30N
Eddy County, New Mexico

FIGURE
2




APPENDIX A

Referenced Well Records

Point of Diversion Summary

quarters are 1=NW 2=NE 3=SW 4=SE
quarters are smallest to largest

NAD83 UTM in meters

Well Tag	POD Nbr	Q64	Q16	Q4	Sec	Tws	Rng	X	Y	Map
	C 02108		NW	SW	08	24S	30E	602702.0	3566487.0 *	

* UTM location was derived from PLSS - see [Help](#)

Driller License:		Driller Company:	
Driller Name:	UNKNOWN		
Drill Start Date:	Drill Finish Date:	1963-12-31	Plug Date:
Log File Date:	PCW Rcv Date:		Source:
Pump Type:	Pipe Discharge Size:		Estimated Yield: 16
Casing Size:	7.00	Depth Well: 200	Depth Water: 186

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

10/25/24 8:12 AM MST

Point of Diversion Summary

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APPENDIX B

Photographic Log



Photographic Log

XTO Energy, Inc.

Nash Draw 8 Federal 001H SWD

Incident Number: NAPP2426027074



Photograph: 1 Date: 9/23/2024
Description: Liner Inspection Activities
View: South



Photograph: 2 Date: 9/23/2024
Description: Liner Inspection Activities
View: Southeast



Photograph: 3 Date: 9/23/2024
Description: Liner Inspection Activities
View: East



Photograph: 4 Date: 9/23/2024
Description: Liner Inspection Activities
View: East

**Photographic Log**

XTO Energy, Inc.

Nash Draw 8 Federal 001H SWD

Incident Number: NAPP2426027074



Photograph: 5 Date: 9/23/2024
Description: Liner Inspection Activities
View: East



Photograph: 6 Date: 9/23/2024
Description: Liner Inspection Activities
View: East



Photograph: 7 Date: 9/23/2024
Description: Liner Inspection Activities
View: West



Photograph: 8 Date: 9/23/2024
Description: Liner Inspection Activities
View: Southeast

Sante Fe Main Office
Phone: (505) 476-3441

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Phone: (505) 629-6116

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State of New Mexico

Energy, Minerals and Natural Resources

Oil Conservation Division

1220 S. St Francis Dr.

Santa Fe, NM 87505

QUESTIONS

Action 411735

QUESTIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 411735
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2426027074
Incident Name	NAPP2426027074 NASH DRAW 8 FEDERAL 001H SWD @ 30-015-41351
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Well	[30-015-41351] NASH DRAW 8 FEDERAL #001

Location of Release Source	
Please answer all the questions in this group.	
Site Name	NASH DRAW 8 FEDERAL 001H SWD
Date Release Discovered	09/14/2024
Surface Owner	Federal

Incident Details	
Please answer all the questions in this group.	
Incident Type	Produced Water Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Other Valve Produced Water Released: 20 BBL Recovered: 20 BBL Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	No
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Worn equipment was cause of release

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QUESTIONS (continued)

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Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	No
Reasons why this would be considered a submission for a notification of a major release	Unavailable.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury.

The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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

I hereby agree and sign off to the above statement	Name: Robert Woodall Title: Environmental Analyst Email: robert.d.woodall@exxonmobil.com Date: 12/13/2024
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QUESTIONS, Page 3

Action 411735

QUESTIONS (continued)

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QUESTIONS

Site Characterization	
<i>Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 1000 (ft.) and ½ (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 300 and 500 (ft.)
Any other fresh water well or spring	Between 300 and 500 (ft.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1 and 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Between 1 and 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Between 1 and 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	09/14/2024
On what date will (or did) the final sampling or liner inspection occur	09/23/2024
On what date will (or was) the remediation complete(d)	09/23/2024
What is the estimated surface area (in square feet) that will be remediated	0
What is the estimated volume (in cubic yards) that will be remediated	0
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS (continued)

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QUESTIONS

Remediation Plan (continued)	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
(Select all answers below that apply.)	
Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	No
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.	
I hereby agree and sign off to the above statement	Name: Robert Woodall Title: Environmental Analyst Email: robert.d.woodall@exxonmobil.com Date: 12/13/2024
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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Action 411735

QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
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	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	384980
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	09/23/2024
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	16400

Remediation Closure Request

Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.

Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	0
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	Liner integrity inspection activities were conducted following the release of 20 bbls of produced water within a lined containment at the Site. Following removal of all fluids and debris by cleaning the liner via power washer, a liner integrity inspection was conducted by Ensolum personnel on September 23, 2024. Upon inspection, no rips, tears, holes, or damage were observed, and the liner was determined to be operating as designed. The release was contained laterally by the lined containment walls.

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (in .pdf format) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

I hereby agree and sign off to the above statement	Name: Robert Woodall Title: Environmental Analyst Email: robert.d.woodall@exxonmobil.com Date: 12/13/2024
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CONDITIONS

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CONDITIONS

Created By	Condition	Condition Date
nvez	Liner inspection approved, release resolved.	1/22/2025