ENSOLUM

December 30, 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
PLU 20 BD West Battery
Incident Number NAPP2429845171
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 site assessment and soil sampling activities performed at the PLU 20 BD West Battery (Site). The purpose of the site assessment and soil sampling activities was to assess for the presence or absence of impacts to soil resulting from a small surface fire due to equipment malfunction at the Site. Based on the field observations, field screening activities, and soil sample laboratory analytical results, XTO is submitting this *Closure Request* describing site assessment and composite soil sampling activities that have occurred and requesting no further action for Incident Number NAPP2429845171.

SITE DESCRIPTION AND RELEASE SUMMARY

The Site is located in Unit N, Section 20, Township 25 South, Range 30 East, in Eddy County, New Mexico (32.11149°, -103.90729°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM).

On October 23, 2024, a malfunction of the low pressure flare resulted in a small fire. Operations were stopped, and the fire was immediately extinguished. No fluids were released. XTO immediately reported the incident to the New Mexico Oil Conservation Division (NMOCD) via Notification of Release (NOR) and an Initial C-141 Application (C-141) on October 24, 2024, and the incident was assigned Incident Number NAPP2429845171.

SITE CHARACTERIZATION AND CLOSURE CRITERIA

The Site was characterized to assess 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 greater than 100 feet below ground surface (bgs) based on a recent soil boring drilled for determination of regional groundwater depth. On February 4, 2020, a soil boring (C-4394) was drilled 0.49 miles west of the Site utilizing sonic drilling method. Soil boring C-4394 was drilled to a depth of 110 feet bgs. A field geologist logged and described soils continuously. No moisture or groundwater was encountered during drilling activites. The borehole was left open for over 72 hours to allow for potential slow infill of groundwater. After the 72-hour waiting period without observing

groundwater, it was confirmed that groundwater was greater than 110 feet bgs. The borehole was properly abandoned with drill cuttings and hydrated bentonite chips. The referenced well records are included in Appendix A.

The closest continuously flowing or significant watercourse to the Site is a seasonal dry wash, located approximately 467 feet southwest of the Site. The Site is greater than 200 feet from a lakebed, sinkhole, or playa lake and greater than 300 feet from an occupied residence, school, hospital, institution, church, or wetland. The Site is greater than 1,000 feet to a freshwater well or spring and is not within a 100-year floodplain or overlying a subsurface mine. The Site is not underlain by unstable geology (low potential 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)-gasoline range organics (GRO) and TPH-diesel range organics (DRO): 1,000 mg/kg
- TPH: 2,500 mg/kg
- Chloride: 20,000 mg/kg

SITE ASSESSMENT ACTIVITIES

On November 12, 2024, Ensolum personnel visited the Site to assess for the presence or absence of impacts to soil based on information provided on the C-141, internal reports, and visual observations. Composite sampling of the ground surface within the scorched area was performed. Three composite confirmation soil samples (CS01 through CS03) were collected at 0.5 feet bgs to assess for the presence or absence of impacted soil. The 5-point composite samples were collected by placing five equivalent aliquots of soil into a 1-gallon, resealable plastic bag and homogenizing the sample by thoroughly mixing. The confirmation soil samples were field screened for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID) and chloride utilizing Hach® chloride QuanTab® test strips. The location of the scorched soil, resulting from the fire, and the confirmation soil samples were mapped utilizing a handheld Global Positioning System (GPS) unit and are depicted on Figure 2. Photographic documentation was completed during the Site visit and a photographic log is included in Appendix B. The scorched soil was removed with hand shovels.

The composite confirmation soil samples were placed directly into pre-cleaned glass jars, labeled with the location, date, time, sampler name, method of analysis, and immediately placed on ice. The soil samples were transported under strict chain-of-custody procedures to Cardinal Laboratories (Cardinal) in Carlsbad, New Mexico, for analysis of the following contaminants of concern (COC): BTEX following United States Environmental Protection Agency (EPA) Method 8021B; TPH- GRO, TPH- DRO, and TPH-oil range organics (ORO) following EPA Method 8015M/D; and chloride following Standards Method SM4500.

LABORATORY ANALYTICAL RESULTS

Laboratory analytical results for confirmation soil samples CS01 through CS03 indicated that all COC concentrations were compliant with the Site Closure Criteria. Laboratory analytical results are summarized in Table 1 and the complete laboratory analytical reports are included in Appendix C.

CLOSURE REQUEST

Site assessment activities were conducted to assess for the presence or absence of impacted soil resulting from the October 23, 2024, surface fire. Laboratory analytical results for the soil samples collected at the location of the fire indicated that all COC concentrations were compliant with the Site Closure Criteria and confirmed no impacts to soil exist due to the incident. Based on the soil samples analytical results further remediation is not required. XTO respectfully requests closure and no further action for Incident Number NAPP2429845171.

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, M.S.
Associate Principal

Cc: Colton Brown, XTO
Kaylan Dirkx, XTO
BLM

Appendices:

Figure 1	Site Receptor Map
Figure 2	Confirmation Soil Sample Locations
Table 1	Soil Sample Analytical Results
Appendix A	Referenced Well Records
Appendix B	Photographic Log
Appendix C	Laboratory Analytical Reports & Chain-of-Custody Documentation

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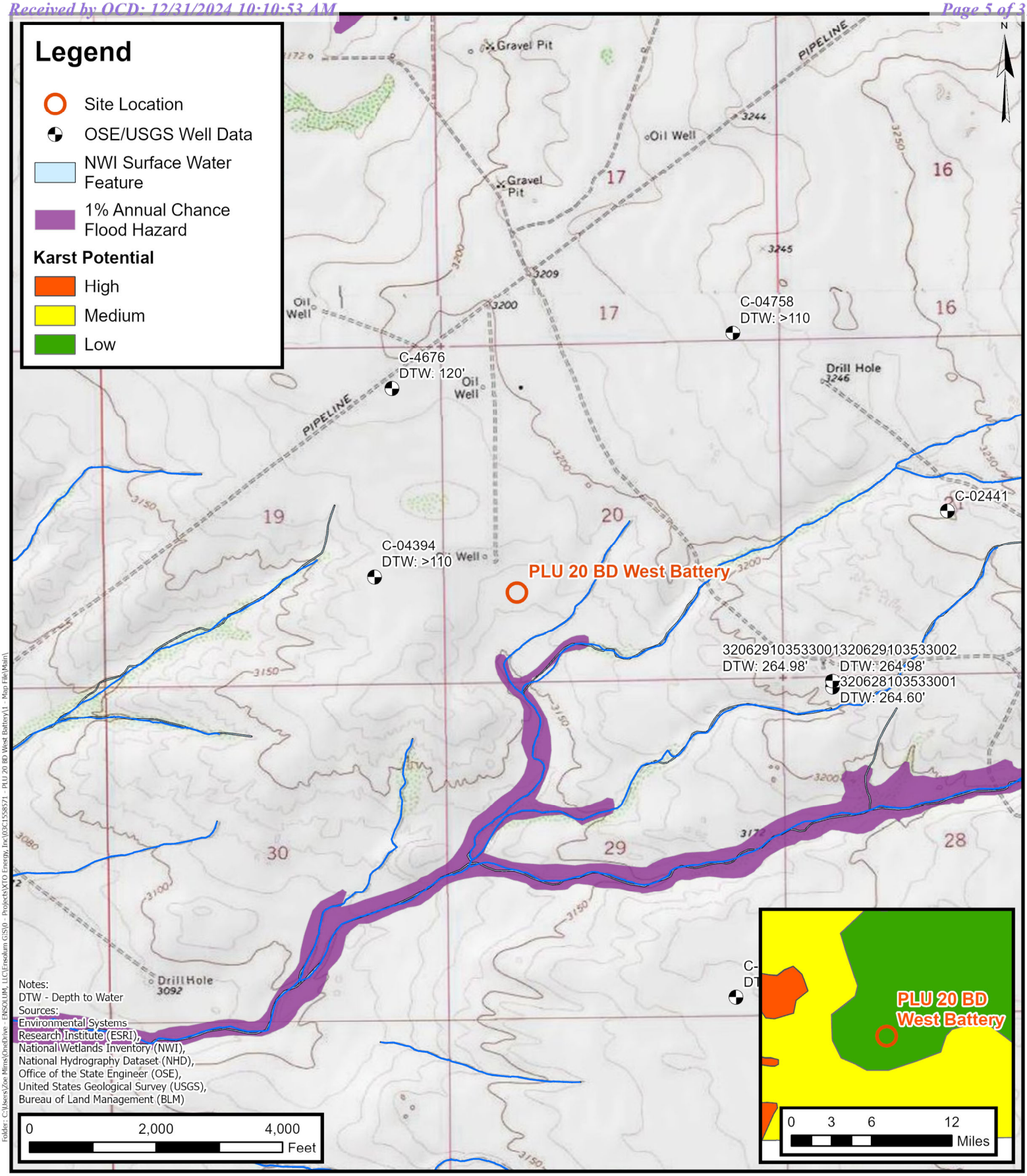
FIGURES



Folder: C:\Users\Zoe Mims\OneDrive - ENSOLUM, LLC\Ensolum GIS\0 - Projects\XTO Energy, Inc\03C1558571 - PLU 20 BD West Battery\1 - Map Files\Main\

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Environmental, Engineering and Hydrogeologic Consultants

Site Receptor Map

XTO Energy, Inc.
PLU 20 BD West Battery
Incident Number: nAPP2429845171
Unit L, Sec 20, T 25S, R 30E
Eddy County, New Mexico

FIGURE 1

Folder: C:\Users\Zoe Mims\OneDrive - ENSOLUM, LLC\Ensolum GIS\0 - Projects\XTO Energy, Inc\03C1558571 - PLU 20 BD West Battery\1 - Map Files\Main\

ENSOLUM
Environmental, Engineering and Hydrogeologic Consultants

Confirmation Soil Sample Location

XTO Energy, Inc.
PLU 20 BD West Battery
Incident Number: nAPP2429845171
Unit L, Sec 20, T 25S, R 30E
Eddy County, New Mexico

FIGURE 2

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TABLES

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TABLE 1
SOIL SAMPLE ANALYTICAL RESULTS
PLU 20 BD West Battery
XTO Energy, Inc
Eddy County, New Mexico

Sample I.D.	Sample Date	Sample Depth (feet bgs)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)	TPH ORO (mg/kg)	GRO+DRO (mg/kg)	Total TPH (mg/kg)	Chloride (mg/kg)
NMOCD Table I Closure Criteria (NMAC 19.15.29)			**10**	**50**	**NE**	**NE**	**NE**	**1,000**	**2,500**	**20,000**
Assessment Soil Samples										
CS01	11/12/2024	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	32.0
CS02	11/12/2024	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	32.0
CS03	11/12/2024	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	32.0

Notes:

bgs: below ground surface
mg/kg: milligrams per kilogram
NMOCD: New Mexico Oil Conservation Division
BTEX: Benzene, Toluene, Ethylbenzene, and Xylenes
Concentrations in **bold** exceed the NMOCD Table I Closure Criteria or reclamation requirement where applicable.
GRO: Gasoline Range Organics
DRO: Diesel Range Organics
ORO: Oil Range Organics
TPH: Total Petroleum Hydrocarbon
NMAC: New Mexico Administrative Code
~~Grey~~ text indicates soil sample removed during excavation activities

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APPENDIX A

Referenced Well Records

LT Environmental, Inc.
508 West Stevens Street
Carlsbad, New Mexico 88220
Compliance · Engineering · Remediation

Identifier:	Date:
MW0 C 4394	2/5/2020
Project Name:	**RP Number:**
PLU 423	2RP-3790

LITHOLOGIC / SOIL SAMPLING LOG

Logged By:	Method:
BP	Sonic

Lat/Long:	Field Screening: CHLORIDES, PID.	Hole Diameter:	Total Depth:
		6"/4"	110'

Comments:

Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Depth (ft. bgs.)	Sample Depth	Soil/Rock Type	Lithology/Remarks
D			N		101		CH	
D			N		102		SP-S	101'- 105' SANDSTONE, tan - light brown, dry, moderately consolidated, calcareous cemented, poorly graded, no stain, no odor.
D			N		103			
D			N		104			
M			N		105			
D			N		106		CH	105'- 110' CLAY, moist, dark brown - brown, high plasticity, cohesive, trace tan sand laminations, no stain, no odor.
D			N		107			
M			N		108			107'- 109' tan - light brown well consolidated fine grain sandstone stringer.
					109			
					110			
					111		TD@110	TD @ 110'
					112			
					113			
					114			
					115			
					116			
					117			
					118			
					119			
					120			
					121			
					122			
					123			
					124			
					125			

LT Environmental, Inc.
508 West Stevens Street
Carlsbad, New Mexico 88220
Compliance · Engineering · Remediation

Identifier:	Date:
MW01 C 4394	2/4/2020
Project Name:	**RP Number:**
PLU 423	2RP-3790
LITHOLOGIC / SOIL SAMPLING LOG	Logged By: FS / Method: SONIC
Lat/Long:	Field Screening: ~~CHLORIDES, PID.~~ / Hole Diameter: 4"/6" / Total Depth: 110'

Comments: No sampling, lithology remarks only

Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Depth (ft. bgs.)	Sample Depth	Soil/Rock Type	Lithology/Remarks
					1			hydrovac excavated (refusal @ 1')
					2			2.5' SAND, dry, well graded, coarse-fine grand, light brwn-tan, no stain, no odor
D			N		3		SW-S	
					4			5' few silty sand pockets, reddish brwn, no plas, non cohesive
D			N		5			
					6			
					7		SP	6' SAND, dry, poorly graded, light brwn-brwn, fine-very fine 2.5-4 9-12
D			N		8			
					9			7.5' some mod consol ss light brwn-brwn, sub rounded
D			N		10		SW-S	
					11			10' abundant ss 10-11' color change
					12			12' ss gravel? absent tan-off white
					13		SP	16' abundant ss gravel (mod consol) 13' back to light brwn-brwn
					14			19' abundant - some
D			N		15			
					16			21.5' sandstone, light, abundant well brwn-tan, dry, mod consolidated
D			N		17		SW-S	
					18			23' sandstone chunks absent
D			N		19			
					20			
					21			
D			N		22			
					23			
					24			
D			N		25			

LT Environmental, Inc.
508 West Stevens Street
Carlsbad, New Mexico 88220
Compliance · Engineering · Remediation

Identifier:	Date:
MW01 C 4394	2/4/2020
Project Name:	**RP Number:**
PLU 423	~~2RP-2674~~ 2RP-3790
LITHOLOGIC / SOIL SAMPLING LOG	Logged By: FS / Method: SONIC
Lat/Long:	Field Screening: ~~CHLORIDES, PID.~~ / Hole Diameter: 4"/6" / Total Depth: 110'

Comments:

Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Depth (ft. bgs.)	Sample Depth	Soil/Rock Type	Lithology/Remarks
					26			27.5' SAND, dry, light brwn - tan, poorly graded, fine-very fine
D			N		27			
					28		SP	30' trace light ~~brwn - tan~~ grey - grey caliche pebbles (gravel), rounded
D			N		29			
					30			31' caliche pebbles absent
D			N		31			
					32			31.5' color change light brwn - reddish brwn
M			N		33			33-34' abundant ss chunks, mod consol
					34			
					35			35' ss chunks absent
M			N		36			
					37		SW-SM	36' some clay pockets, reddish brwn, few pebbles, rounded - subrounded, grey - light grey, few laminations w/ clay, caliche, dolomite?
M			N		38			
					39			
					40			
M			N		41			42.5' clay laminations, trace, reddish brwn
					42			
M			N		43			44' color change, light brwn - tan, SILTY sand
					44			
M			N		45		SP-SM	44.5' some SILTY sand, predomin light brwn - tan, no plasticity, non cohesive, trace high plas clay nodules, reddish brwn
					46			
D			N		47			48.5' low plas clay band, orange (35-40 mm)
					48			
					49			49.5' faint yellow band, (15-20 mm)
D			N		50			

rig adding water

LT Environmental, Inc.
508 West Stevens Street
Carlsbad, New Mexico 88220
Compliance · Engineering · Remediation

Identifier:	Date:
MW01 C 4394	2/4/2020
Project Name:	**RP Number:**
PLU 423	2RP-3790
LITHOLOGIC / SOIL SAMPLING LOG	Logged By: FS / Method: sonic
Lat/Long:	Field Screening: ~~CHLORIDES, PID~~ / Hole Diameter: 4"/6" / Total Depth: 110'

Comments:

Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Depth (ft. bgs.)	Sample Depth	Soil/Rock Type	Lithology/Remarks
					51		SP	51.5' trace, high plas clay nodules
D			N		52			
					53			53-54' some silty ss, poorly consolidated
D			N		54			
					55			55.5' color change tan-grey band (30mm)
M			N		56			
					57	X		59.5' SILTY sand, light brwn-brwn, moist, no plas, non cohesive, no stain
M			N		58			
					59			
M			N		60		SM	62' more consolidated
					61			
					62			64' dark brwn color change, silty clay nodules
D			N		63		SM-S	
					64			66' pockets of silty clay brwn-green
M			N		65			
					66			68' low plas clay pockets some, few low plas clay laminations
M			N		67			
					68			71' SILTY sand, dry, no plas, non cohesive, light brwn-tan
M			N		69			
					70			74' trace caliche pebbles, light grey-grey
D			N		71		SM	
					72			
					73			
					74			
D			N		75			

LT Environmental, Inc.
508 West Stevens Street
Carlsbad, New Mexico 88220
Compliance · Engineering · Remediation

Identifier:	Date:
MW01 C 4394	2/4/2020
Project Name:	**RP Number:**
PLU 423	2RP-3790
Logged By: FS, BB	**Method:** sonic
Lat/Long:	**Field Screening:** ~~CHLORIDES, PID~~
Hole Diameter: 6"/4"	**Total Depth:** 110'

LITHOLOGIC / SOIL SAMPLING LOG

Comments:

Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Depth (ft. bgs.)	Sample Depth	Soil/Rock Type	Lithology/Remarks
						76	SM	76.5' trace low plas clay nodules, reddish brwn
D			N			77		
						78		82' CLAYSTONE, moist, brwn-greenish grey, low plasticity, cohesive, no stain, no odor mod consolidated
D			N			79		
						80		
D			N			81		85' SILTY sand, dry, light brwn - brwn, no plas, non cohesive, no stain, no odor
						82	CL-S	
M			N			83		
						84		
						85	SM	87' color change tan - off white
D			N			86		88' light brwn - brwn
						87	SM-S	
D			N			88		87' SILTSTONE, dry, w/ clay pockets, low plas
						89		
D			N			90		
						91		91' abundant clay pockets
						92		94.5' band yellow low plas clay
D			N			93		
						94	SM	
D			N			95	CH	end@95' 2/4/2020
						96		2/5/20
M			N			97		95'-101 CLAY, moist, brown - dark brown, high plasticity, cohesive, some tan clay laminations, no stain, no odor.
M			N			98		
D			N			99		98'-99' tan fine grain sandstone stringer.
M			N			100		

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APPENDIX B

Photographic Log

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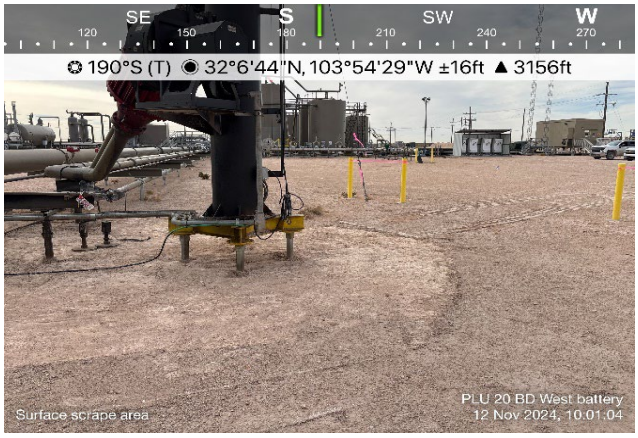
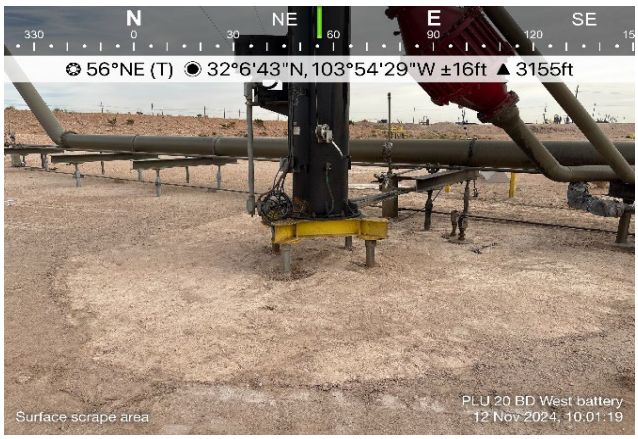
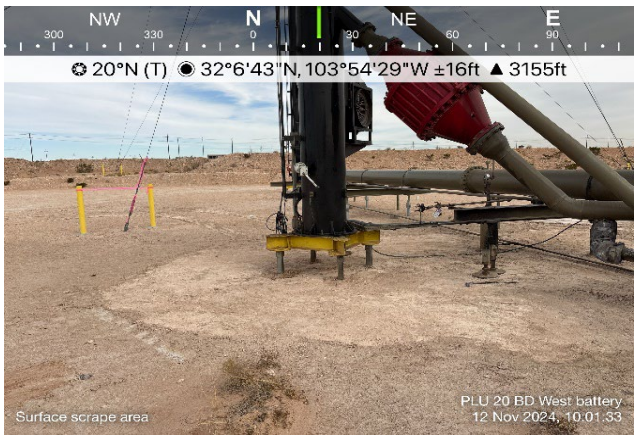
Photographic Log
XTO Energy, Inc.
PLU 20 BD West Battery
nAPP2429845171



Photograph: 1 Date: 11/12/2024
Description: Surface scrape activities
View: South



Photograph: 2 Date: 11/12/2024
Description: Surface scrape activities
View: Northeast



Photograph: 3 Date: 11/12/2024
Description: Surface scrape activities
View: North

Photograph: 4 Date: 11/12/2024
Description: Surface scrape activities
View: Southeast

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APPENDIX C

Laboratory Analytical Reports & Chain of Custody Documentation

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

November 15, 2024

TRACY HILLARD

ENSOLUM

3122 NATIONAL PARKS HWY

CARLSBAD, NM 88220

RE: PLU 20 BRUSHY DRAW WEST BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 11/14/24 13:55.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Celey D. Keene

Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

ENSOLUM
TRACY HILLARD
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220
Fax To:

Received:	11/14/2024	Sampling Date:	11/12/2024
Reported:	11/15/2024	Sampling Type:	Soil
Project Name:	PLU 20 BRUSHY DRAW WEST BATTERY	Sampling Condition:	Cool & Intact
Project Number:	03C1558571	Sample Received By:	Alyssa Parras
Project Location:	XTO 32.11165-103.90780		

Sample ID: CS 01 (H246959-01)

BTEX 8021B mg/kg Analyzed By: JH

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	11/14/2024	ND	1.97	98.4	2.00	8.56	
Toluene*	<0.050	0.050	11/14/2024	ND	1.99	99.3	2.00	9.64	
Ethylbenzene*	<0.050	0.050	11/14/2024	ND	2.15	107	2.00	7.04	
Total Xylenes*	<0.150	0.150	11/14/2024	ND	6.42	107	6.00	7.43	
Total BTEX	<0.300	0.300	11/14/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID *107 %* *71.5-134*

Chloride, SM4500Cl-B mg/kg Analyzed By: CT

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**32.0**	16.0	11/15/2024	ND	448	112	400	3.64	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	11/14/2024	ND	214	107	200	2.95	
DRO >C10-C28*	<10.0	10.0	11/14/2024	ND	215	107	200	6.91	
EXT DRO >C28-C36	<10.0	10.0	11/14/2024	ND					

Surrogate: 1-Chlorooctane *93.4 %* *48.2-134*

Surrogate: 1-Chlorooctadecane *96.5 %* *49.1-148*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

ENSOLUM
TRACY HILLARD
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220
Fax To:

Received:	11/14/2024	Sampling Date:	11/12/2024
Reported:	11/15/2024	Sampling Type:	Soil
Project Name:	PLU 20 BRUSHY DRAW WEST BATTERY	Sampling Condition:	Cool & Intact
Project Number:	03C1558571	Sample Received By:	Alyssa Parras
Project Location:	XTO 32.11165-103.90780		

Sample ID: CS 02 (H246959-02)

BTEX 8021B mg/kg Analyzed By: JH

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	11/14/2024	ND	1.97	98.4	2.00	8.56	
Toluene*	<0.050	0.050	11/14/2024	ND	1.99	99.3	2.00	9.64	
Ethylbenzene*	<0.050	0.050	11/14/2024	ND	2.15	107	2.00	7.04	
Total Xylenes*	<0.150	0.150	11/14/2024	ND	6.42	107	6.00	7.43	
Total BTEX	<0.300	0.300	11/14/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID *117 %* *71.5-134*

Chloride, SM4500Cl-B mg/kg Analyzed By: CT

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**32.0**	16.0	11/15/2024	ND	448	112	400	3.64	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	11/15/2024	ND	214	107	200	2.95	
DRO >C10-C28*	<10.0	10.0	11/15/2024	ND	215	107	200	6.91	
EXT DRO >C28-C36	<10.0	10.0	11/15/2024	ND					

Surrogate: 1-Chlorooctane *110 %* *48.2-134*

Surrogate: 1-Chlorooctadecane *113 %* *49.1-148*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

ENSOLUM
TRACY HILLARD
3122 NATIONAL PARKS HWY
CARLSBAD NM, 88220
Fax To:

Received:	11/14/2024	Sampling Date:	11/12/2024
Reported:	11/15/2024	Sampling Type:	Soil
Project Name:	PLU 20 BRUSHY DRAW WEST BATTERY	Sampling Condition:	Cool & Intact
Project Number:	03C1558571	Sample Received By:	Alyssa Parras
Project Location:	XTO 32.11165-103.90780		

Sample ID: CS 03 (H246959-03)

BTEX 8021B mg/kg Analyzed By: JH

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	11/15/2024	ND	1.97	98.4	2.00	8.56	
Toluene*	<0.050	0.050	11/15/2024	ND	1.99	99.3	2.00	9.64	
Ethylbenzene*	<0.050	0.050	11/15/2024	ND	2.15	107	2.00	7.04	
Total Xylenes*	<0.150	0.150	11/15/2024	ND	6.42	107	6.00	7.43	
Total BTEX	<0.300	0.300	11/15/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID *103 %* *71.5-134*

Chloride, SM4500Cl-B mg/kg Analyzed By: CT

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**32.0**	16.0	11/15/2024	ND	448	112	400	3.64	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	11/15/2024	ND	214	107	200	2.95	
DRO >C10-C28*	<10.0	10.0	11/15/2024	ND	215	107	200	6.91	
EXT DRO >C28-C36	<10.0	10.0	11/15/2024	ND					

Surrogate: 1-Chlorooctane *110 %* *48.2-134*

Surrogate: 1-Chlorooctadecane *112 %* *49.1-148*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C
	Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

Company Name: Ensolum	**BILL TO**
Project manager: Tracy Hillard	P.O. #:
Address: 3122 National Parks Hwy	Company: XTO Energy
City: Carlsbad State: NM ZIP: 88220	Attn: Colton Brown
Phone #: 575-937-3906	Address: 3104 E Greene st.
Project #: 03C1558571	City: Carlsbad
Project Name: PLU 20 BD West Battery	State: NM Zip: 88220
Project Location: 32.11165, -103.90780	Phone #:
Sampler Name: Uriel Santillana	Fax #:

FOR LAB USE ONLY Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX: GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	PRESERV.: ACID/BASE:	ICE / COOL	OTHER :	SAMPLING: DATE	TIME	ANALYSIS REQUEST: CHLORIDES	TPH	BTEX
H24169 59	CS01	C	1			X					X		11/12/24	1120	X	X	X
2	CS02	↓	↓			↓					↓		↓	1100	X	X	X
3	CS03													1040	X	X	X

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequental damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By: U Santillana	Date: 11-14-24 Time: 1355	Received By:	Verbal Result: ☐ Yes ☐ No Add'l Phone #: thillard@ensolum.com tmorrissey@ensolum.com kthomason@ensolum.com usantillana@ensolum.com
Relinquished By:	Date: Time:	Received By:	REMARKS: Cost center: 2147581001 Incident ID: nAPP2429845171 API: fAPP2126355870

Delivered By: (Circle One) Sampler - UPS - Bus - Other:	Observed Temp. °C 6.4 Corrected Temp. °C 5.8	Sample Condition Cool: ☐ Yes ☑ Yes ☐ No ☐ No Intact: ☐ Yes ☐ Yes ☐ No ☐ No	CHECKED BY: (Initials) PD	Turnaround Time: Standard ☐ Bacteria (only) Sample Condition Rush: 24 hr ☒ Cool ☐ Intact ☐ Observed Temp. °C Thermometer ID #140 Correction Factor 0.6 ☐ Yes ☐ Yes ☐ No ☐ No Corrected Temp. °C

FORM-006 R 3.2 10/07/21

† Cardinal cannot accept verbal changes. Please email changes to celey.keene@cardinallabsnm.com

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

QUESTIONS

Action 416071

QUESTIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 416071
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	**nAPP2429845171**
Incident Name	**NAPP2429845171 PLU 20 BD WEST BATTERY @ 0**
Incident Type	**Fire**
Incident Status	**Remediation Closure Report Received**
Incident Facility	**[fAPP2126355870] PLU 20 BRUSHY DRAW WEST BTY**

Location of Release Source	
Please answer all the questions in this group.	
Site Name	PLU 20 BD WEST BATTERY
Date Release Discovered	10/23/2024
Surface Owner	Federal

Incident Details	
Please answer all the questions in this group.	
Incident Type	Fire
Did this release result in a fire or is the result of a fire	Yes
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	Cause: Fire | Other (Specify) | Crude Oil | Released: 0 BBL | Recovered: 0 BBL | Lost: 0 BBL.
Produced Water Released (bbls) Details	*Not answered.*
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)	fire at flare

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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

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	**More info needed to determine if this will be treated as a "gas only" report.**
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	**Yes**
Reasons why this would be considered a submission for a notification of a major release	**From paragraph A. "Major release" determine using:** **(2) an unauthorized release of a volume that:** **(a) results in a fire or is the result of a fire.**
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: Colton Brown Title: Environmental Advisor Email: colton.s.brown@exxonmobil.com Date: 12/31/2024

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QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 416071
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Site Characterization	
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.	
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	Greater than 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 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 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
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	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Between 500 and 1000 (ft.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan	
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.	
Requesting a remediation plan approval with this submission	Yes
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.	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No
Soil Contamination Sampling: (Provide the highest observable value for each, in milligrams per kilograms.)	
Chloride (EPA 300.0 or SM4500 Cl B)	0
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	0
GRO+DRO (EPA SW-846 Method 8015M)	0
BTEX (EPA SW-846 Method 8021B or 8260B)	0
Benzene (EPA SW-846 Method 8021B or 8260B)	0
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.	
On what estimated date will the remediation commence	10/23/2024
On what date will (or did) the final sampling or liner inspection occur	11/11/2024
On what date will (or was) the remediation complete(d)	11/15/2024
What is the estimated surface area (in square feet) that will be reclaimed	0
What is the estimated volume (in cubic yards) that will be reclaimed	0
What is the estimated surface area (in square feet) that will be remediated	1000
What is the estimated volume (in cubic yards) that will be remediated	0
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.	
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.	

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QUESTIONS (continued)

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 416071
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)	
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.	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
(Select all answers below that apply.)	
(Ex Situ) Excavation and **off-site** disposal (i.e. dig and haul, hydrovac, etc.)	No
(Ex Situ) Excavation and **on-site** remediation (i.e. On-Site Land Farms)	*Not answered.*
(In Situ) Soil Vapor Extraction	*Not answered.*
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	*Not answered.*
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	*Not answered.*
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	*Not answered.*
Ground Water Abatement pursuant to 19.15.30 NMAC	*Not answered.*
OTHER (Non-listed remedial process)	Yes
Other Non-listed Remedial Process. Please specify	Inspection activities were conducted following a small fire due to equipment malfunction at the Site. No fluids were released, and photographic documentation of the surface scraping extent was obtained on November 12, 2024. The fire was immediately extinguished and following repairs, the pump truck was returned to service.
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 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: Colton Brown Title: Environmental Advisor Email: colton.s.brown@exxonmobil.com Date: 12/31/2024
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.	

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QUESTIONS (continued)

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	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Deferral Requests Only *Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.*	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

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QUESTIONS (continued)

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	Action Number: 416071
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	**400201**
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	**11/15/2024**
What was the (estimated) number of samples that were to be gathered	**5**
What was the sampling surface area in square feet	**1000**

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	**No**
All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion	Yes
What was the total surface area (in square feet) remediated	1000
What was the total volume (cubic yards) remediated	0
All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX, and 10 mg/kg Benzene	Yes
What was the total surface area (in square feet) reclaimed	0
What was the total volume (in cubic yards) reclaimed	0
Summarize any additional remediation activities not included by answers (above)	Inspection activities were conducted following a small fire due to equipment malfunction at the Site. No fluids were released, and photographic documentation of the surface scraping extent was obtained on November 12, 2024. The fire was immediately extinguished and following repairs, the pump truck was returned to service.

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: Colton Brown Title: Environmental Advisor Email: colton.s.brown@exxonmobil.com Date: 12/31/2024

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QUESTIONS (continued)

Operator:	OGRID:
XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	5380
	Action Number: 416071
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Reclamation Report	
Only answer the questions in this group if all reclamation steps have been completed.	
Requesting a reclamation approval with this submission	No

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CONDITIONS

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	Action Number: 416071
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	None	1/29/2025