ENSOLUM

January 31, 2025

New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Remediation Work Plan
Nimitz MDP1 12 Federal 002H
API# 30-015-44498
Incident Number: nAPP2431326565
32.225552°N, 103.821365°W
Eddy County, New Mexico

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of Oxy USA, Inc. (Oxy), has prepared the following *Remediation Work Plan* (*Work Plan*) to document the site assessment activities completed to date and propose a work plan to address impacted soil identified at the Nimitz MDP1 12 Federal 002H (Site). The purpose of the site assessment activities was to delineate the vertical and lateral extent of impacted soil resulting from a release of crude oil and produced water at the Site. The following Work Plan proposes to excavate impacted soil within the top 1 foot below ground surfce (bgs) of the release extent.

SITE DESCRIPTION AND RELEASE SUMMARY

The Site is located in Unit M, Section 07, Township 24 South, Range 31 East, in Eddy County, New Mexico (32.225552°N, 103.821365°W) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM).

On November 4, 2024, a flowline malfunctioned resulting in the release of approximately 15 barrels (bbls) of crude oil and 15 bbls of produced water onto the ground surface, with approximately 10 bbls of crude oil and 10 bbls of produced water subsequently recovered utilizing a vacuum trucks. Oxy reported the release to the New Mexico Oil Conservation Division (NMOCD) on November 8, 2024 and the release was assigned Incident Number NAPP2431326565.

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 on NMOCD Portal of the Form C-141, Site Assessment/Characterization submitted on November 18, 2024. Potential site receptors are identified on **Figure 1** in **Appendix A**.

Depth to groundwater at the Site is greater than 50 feet bgs based on the nearest groundwater well data. On June 14, 1961, a United States Geological Survey (USGS) permited well (USGS 321334103494901) was advanced to a depth of 500 feet bgs. Groundwater was encoutered at 367 feet bgs. On January 17, 2013, a USGS permited well (USGS 321310103482101) was remeasered and measured groundwater to be at a depth of 74 feet bgs. Both wells are depicted on **Figure 1** in **Appendix A**. The Well Records are included in **Appendix B**.

The closest continuously flowing or significant watercourse to the Site is a freshwater emergent wetland located approximately 146 feet southeast 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 karst designation area).

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

SITE ASSESSMENT AND DELINEATION ACTIVITIES

Between November 18, 2024 and January 27, 2025, Ensolum personnel conducted multiple Site visits to evaluate the release extent based on information provided on the C-141 and visual observations. Ensolum personnel collected eight initial soil samples at four locations (SS01 through SS04) within the release extent from a depth 0.25 feet bgs and one foot bgs, four pothole soil samples (PH01 through PH04) within the release extent from a depth of 1 foot before refusal was encountered, and five delineation soil samples (DS01 through DS05) outside the relase extent from a depth of 0.25 feet bgs. The soil samples were field screened for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID), and chloride using Hach® chloride QuanTab® test strips. The delineation soil samples were submitted for laboratory analysis of BTEX, TPH, and chloride. The release extent and soil sample locations were mapped utilizing a handheld Global Positioning System (GPS) unit and are depicted on **Figure 2** (**Appendix A**). Photographic documentation was completed during the Site visit and a Photographic Log is included in **Appendix C**.

FIELD SCREENING RESULTS

Laboratory analytical results for the lateral delineation soil samples (DS01 through DS05) indicated that BTEX, TPH, and chloride concentrations were below the Closure Criteria.

Field screening results for the initial soil samples (SS01 through SS04) and vertical delineation soil samples (PH01 through PH04) indicated that VOCs, TPH, and/or chloride concentrations are above the Closure Criteria at depths of 0.25 feet and one foot bgs at each soil sample location. The terminal depth sample (1 foot bgs) collected from each delineation pothole (PH01 through PH04) indicated concentrations of all COCs were not compliant with the Closure Criteria and did not successfully defined the vertical extent of impacted soil before encountering refusal.

Once excavation activities are completed based off the data from the pothole samples, official excavation composite floor and sidewall soil samples will be collected every 200 square feet. Samples will be placed in pre-cleaned glass jars labeled with the location, date, time, sampler name, method of analysis, and immediately placed on ice. The samples will be transported under strict chain-of-custody procedures to Cardinal Laboratories (Cardinal) in Hobbs, New Mexico, for analysis of BTEX, following United States Environmental Protection Agency (EPA) Method 8021B; TPH-gasoline range organics (GRO), TPH-diesel range organics (DRO), and TPH-oil range organics (ORO) following EPA Method 8015M/D; and chloride following Standard Method SM-4500 Cl-B.

VARIANCE REQUESTS

Groundwater Variance

Based on a desktop review of the surrounding area, there are two USGS permitted wells (USGS 321334103494901 and USGS 321310103482101) with depths to groundwater greater than 50 feet bgs as shown in **Figure 1**. The Well Records for both wells can be found as Supporting Documentation in **Appendix A**. However, USGS well 321334103494901 was completed in 1961, therefore its data is greater than 25 years of age and is approximately 0.55 miles away from site. As well, USGS well 321310103482101 is approximately 0.9 miles away from the Site, which is outside the permissible 0.5-mile radius.

Ensolum, on behalf of Oxy, would like to request a depth to groundwater Closure Criteria Variance for the Site based on the information provided above and included as Supporting Documentation in **Appendix A** to reflect groundwater greater than 50 feet as shown in Table I of 19.15.29.12 NMAC for any pasture remediation greater than 4 feet bgs.

Wetland Variance

Additionally, although the National Wetlands Inventory website depicts a “Freshwater Emergent Wetland” to the southeast of the Site, the USGS National Water Dashboard does not define this area as a “Freshwater Emergent Wetland” and has no symbology present for any type of continuously flowing watercourse or significant watercourse. A screenshot of the Site on the USGS National Water Dashboard is Included in **Appendix A**.

As defined in NMAC 19.15.17.7:

“Significant Watercourse” means a watercourse with a defined bed and bank either named or identified by a dashed blue line on a USGS 7.5 minute quadrangle map or the next lower tributary with a defined bed and bank of such watercourse.

Based on the above statements regarding DTW at the Site being greater than 50 feet bgs, and that the USGS National Water Dashboard does not recognize the area to the southeast of the Site having a “Freshwater Emergent Wetland” channel, continuously flowing watercourse, or a significant watercourse as defined in NMAC 19.15.17.7, Ensolum requests a Closure Criteria Variance to reflect groundwater >50 feet as shown in Table 1 of 19.15.29.12 NMAC for any off-pad remediation greater than 4 feet bgs.

PROPOSED REMEDIATION WORK PLAN

The delineation soil sampling results indicate soils containing elevated VOCs, TPH and/or chloride concentrations exist across an approximate 1,688 square foot area and extends to a maximum depth of approximately one foot bgs. Oxy proposes to complete the following remediation activities:

- Excavation of impacted soil to depths of one foot bgs based on the pothole delineation field screening soil sample results. Excavation will proceed vertically and laterally until the excavation floor and sidewall samples confirm benzene, total BTEX, TPH, and chloride concentrations are compliant with the applicable Closure Criteria or until refusal is encountered.
- An estimated 62.5 cubic yards of impacted soil will be excavated. The excavated soil will be transferred to a New Mexico approved landfill facility for disposal.
- The excavation will be backfilled and recontoured to match pre-existing conditions

Oxy will proceed with the excavation and soil sampling activities and will submit a Closure Report within 90 days of the date of approval of this Work Plan by the NMOCD. If you have any questions or comments, please contact Ms. Samantha MacKenzie at (703) 357-3545 or smackenzie@ensolum.com.

Sincerely,
Ensolum, LLC

Samantha MacKenzie
Staff Geologist

Beaux Jennings
Associate Principal

cc: Wade Dittrich, Oxy USA, Inc.
Tyson Pierce, Oxy USA, Inc.
New Mexico Bureau of Land Management

Appendices:

Appendix A Figures
Appendix B Supporting Documentation
Appendix C Photographic Log
Appendix D Tables
Appendix E Laboratory Analytical Reports & Chain-of-Custody Documentation

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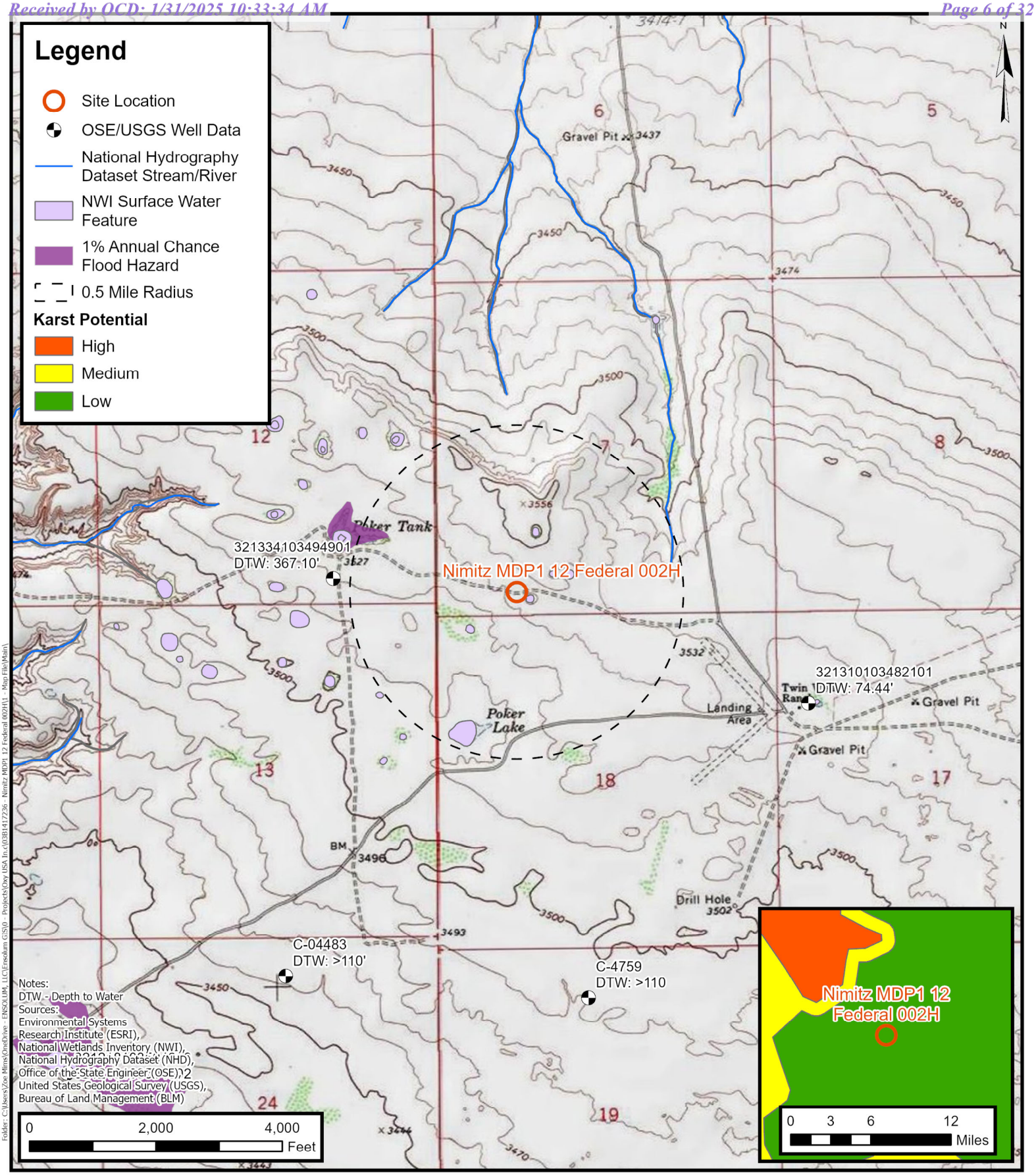
APPENDIX A

Figures



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Environmental, Engineering and Hydrogeologic Consultants

Site Receptor Map

Oxy USA, Inc.
Nimitz MDP1 12 Federal 002H
Incident Number: nAPP2431326565
32.225552, -103.821365
Eddy County, New Mexico

FIGURE 1

Folder: C:\Users\Zoe Mims\OneDrive - ENSOLUM, LLC\Ensolum GIS\0 - Projects\Oxy USA Inc.\03B141726 - Nimitz MDP1 12 Federal 002H\1 - Map File\Main\

ENSOLUM
Environmental, Engineering and Hydrogeologic Consultants

Delineation Soil Sample Locations

Oxy USA, Inc.
Nimitz MDP1 12 Federal 002H
Incident Number: nAPP2431326565
32.225552, -103.821365
Eddy County, New Mexico

FIGURE 2

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APPENDIX B

Supporting Documentation

USGS 321334103494901 24S.30E.12.432344

Eddy County, New Mexico
Latitude 32°13'34", Longitude 103°49'49" NAD27
Land-surface elevation 3,522 feet above NAVD88
The depth of the well is 500 feet below land surface.
This well is completed in the Other aquifers (N9999OTHER) national aquifer.
This well is completed in the Rustler Formation (312RSLR) local aquifer.

Output formats

- Table of data
- Tab-separated data
- Graph of data
- Reselect period

Date	Time	Water-level date-time accuracy	Parameter code	Water level, feet below land surface	Water level, feet above specific vertical datum	Referenced vertical datum	Status	Method of measurement	Measuring agency	Source of measurement	Water-level approval status
1961-06-14		D	62610		3153.16	NGVD29	1	Z			A
1961-06-14		D	62611		3154.90	NAVD88	1	Z			A
1961-06-14		D	72019	367.10			1	Z			A

USGS 321310103482101 24S.31E.17.13120

Eddy County, New Mexico
Latitude 32°13'14.1", Longitude 103°48'23.4" NAD83
Land-surface elevation 3,530.00 feet above NGVD29
This well is completed in the Other aquifers (N9999OTHER) national aquifer.
This well is completed in the Alluvium, Bolson Deposits and Other Surface Deposits (110AVMB) local aquifer.

Output formats

- Table of data
- Tab-separated data
- Graph of data
- Reselect period

Date	Time	Water-level date-time accuracy	Parameter code	Water level, feet below land surface	Water level, feet above specific vertical datum	Referenced vertical datum	Status	Method of measurement	Measuring agency	Source of measurement	Water-level approval status
1959-02-03		D	62610		3459.50	NGVD29	P	Z			A
1959-02-03		D	62611		3461.24	NAVD88	P	Z			A
1959-02-03		D	72019	70.50			P	Z			A
1959-03-25		D	62610		3462.33	NGVD29	1	Z			A
1959-03-25		D	62611		3464.07	NAVD88	1	Z			A
1959-03-25		D	72019	67.67			1	Z			A
1976-12-02		D	62610		3463.98	NGVD29	1	Z			A
1976-12-02		D	62611		3465.72	NAVD88	1	Z			A
1976-12-02		D	72019	66.02			1	Z			A
2013-01-17	21:00 UTC	m	62610		3455.56	NGVD29	1	S	USGS	S	A
2013-01-17	21:00 UTC	m	62611		3457.30	NAVD88	1	S	USGS	S	A
2013-01-17	21:00 UTC	m	72019	74.44			1	S	USGS	S	A

32.225552°N, 103.821365°W

Site

Close

Legend

Watersheds

Watershed boundary

Comments: Watershed boundaries are determined by hydrologic units. Zooming the map out shows more generalized (regional) watersheds while zooming the map in shows more detailed (local) watersheds.

Source: USGS National Map

Service: ArcGIS MapServer

Aquifers

Blues	Unconsolidated and semiconsolidated sand and gravel aquifers
Yellow	Coastal Plain aquifer systems in semiconsolidated sand
Greens	Sandstone aquifers
Purples	Sandstone and carbonate-rock aquifers
Browns	Carbonate-rock aquifers
Reds	Igneous and metamorphic-rock aquifers
White	Other

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APPENDIX C

Photographic Log

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Photographic Log
Oxy USA Inc.
Nimitz MDP1 12 Federal 002H
Incident Number nAPP2431326565

Photograph: 1 Date: 11/18/2024
Description: Release footprint
View: West

Photograph: 2 Date: 1/7/2025
Description: Initial Sampling
View: Northeast

Photograph: 3 Date: 1/27/2025
Description: Pothole Sampling
View: Northeast

Photograph: 4 Date: 1/27/2025
Description: Pothole Sampling
View: Southwest

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APPENDIX D

Table

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TABLE 1
FIELD SCREENING SOIL SAMPLE RESULTS
Nimitz MDP1 12 Federal 002H
Oxy USA, Inc.
Eddy County, New Mexico
Ensolum Project No. 03B1417236

Sample Designation	Date	Depth (feet bgs)	PID Field Screening Results (ppm)	Chloride Strips Field Screening Results (mg/kg)
New Mexico Oil Conservation Division Closure Criteria for Soils Impacted by a Release			**NA**	**Chloride 600 mg/kg**
Inital Soil Sample Analytical Results				
SS01	01/07/2025	0.25	**847**	**1,820**
	01/07/2025	1	**954**	**>3355**
SS02	01/07/2025	0.25	**589**	**750.4**
	01/07/2025	1	**1,115**	**1,820**
SS03	01/07/2025	0.25	**1,484**	**>3355**
	01/07/2025	1	**1,600**	**>3355**
SS04	01/07/2025	0.25	**792**	**>3355**
	01/07/2025	1	**812**	**>3355**
Pothole Soil Sample Analytical Results				
PH01	01/27/2025	1	**2,811**	**>3,600**
PH02	01/27/2025	1	**2,869**	**1,909**
PH03	01/27/2025	1	**2,872**	**3,102**
PH04	01/27/2025	1	**2,961**	**>3,600**
Delineation Soil Sample Analytical Results				
DS01	01/07/2025	0.25	0.1	ND
DS02	01/07/2025	0.25	0.3	ND
DS03	01/07/2025	0.25	0.1	ND
DS04	01/07/2025	0.25	0.1	ND
DS05	01/07/2025	0.25	0.0	ND

*Concentrations in **bold** and yellow exceed the New Mexico Oil Conservation Division Closure Criteria for Soils Impacted by a Release (≤ 50 feet)*

bgs: below ground surface
mg/kg: milligrams per kilogram
ppm: parts per million
ND: Non Detect
NA: Not Applicable

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TABLE 2
SOIL SAMPLE ANALYTICAL RESULTS
Nimitz MDP1 12 Federal 002H
Oxy USA, Inc.
Eddy County, New Mexico
Ensolum Project No. 03B1417236

Sample Designation	Date	Depth (feet bgs)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Total Xylenes (mg/kg)	Total BTEX (mg/kg)	TPH GRO C_6-C_{12} (mg/kg)	TPH DRO >C_{12}-C_{28} (mg/kg)	TPH MRO >C_{28}-C_{35} (mg/kg)	TPH Total C_6-C_{35} (mg/kg)	Chloride (mg/kg)
New Mexico Oil Conservation Division Closure Criteria for Soils Impacted by a Release			**10**	**NE**	**NE**	**NE**	**50**	**NE**	**NE**	**NE**	**100**	**600**
Delineation Soil Sample Analytical Results												
DS01	01/07/2025	0.25	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<16.0
DS02	01/07/2025	0.25	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<16.0
DS03	01/07/2025	0.25	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<16.0
DS04	01/07/2025	0.25	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<16.0
DS05	01/07/2025	0.25	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<16.0

*Concentrations in **bold** and yellow exceed the New Mexico Oil Conservation Division Closure Criteria for Soils Impacted by a Release*

represents samples that have been excavated

bgs: below ground surface

NE: Not Established

mg/kg: milligrams per kilogram

BTEX: Benzene, Toluene, Ethylbenzene, and Xylenes

GRO: Gasoline Range Organics

DRO: Diesel Range Organics

MRO: Motor Oil/Lube Oil Range Organics

GRO: Gasoline Range Organics

DRO: Diesel Range Organics

TPH: Total Petroleum Hydrocarbons

Texas Commission on Envrionmental Quality Texas Risk Reduction Program Tier 1 Commerical/Industrial Soil Protective Concentration Limits $^{GW}Soil_{Ing}$

Railroad Commission of Texas Constituents of Concern Guidelines for Substance Released, Version 12; dated April 13, 2017

Texas Commission on Environmental Quality Texas-Specific Soil Background Concentrations

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APPENDIX E

Laboratory Analytical Reports &

Chain-of-Custody Documentation

CARDINAL Laboratories

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

January 13, 2025

SAMANTHA MACKENZIE

ENSOLUM, LLC

705 W WADLEY AVE.

MIDLAND, TX 79705

RE: NIMITZ MDPI 12 FEDERAL 002H

Enclosed are the results of analyses for samples received by the laboratory on 01/07/25 16:03.

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, LLC
SAMANTHA MACKENZIE
705 W WADLEY AVE.
MIDLAND TX, 79705
Fax To:

Received:	01/07/2025	Sampling Date:	01/07/2025
Reported:	01/13/2025	Sampling Type:	Soil
Project Name:	NIMITZ MDPI 12 FEDERAL 002H	Sampling Condition:	Cool & Intact
Project Number:	03B1417236	Sample Received By:	Alyssa Parras
Project Location:	OXY - EDDY CO NM		

Sample ID: DS 01 0.25' (H250066-01)

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	01/09/2025	ND	1.91	95.3	2.00	2.44	
Toluene*	<0.050	0.050	01/09/2025	ND	1.87	93.7	2.00	4.26	
Ethylbenzene*	<0.050	0.050	01/09/2025	ND	2.00	100	2.00	5.90	
Total Xylenes*	<0.150	0.150	01/09/2025	ND	6.04	101	6.00	5.76	
Total BTEX	<0.300	0.300	01/09/2025	ND					

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

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

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	01/08/2025	ND	416	104	400	3.77	

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	01/08/2025	ND	210	105	200	2.90	
DRO >C10-C28*	<10.0	10.0	01/08/2025	ND	205	103	200	2.67	
EXT DRO >C28-C36	<10.0	10.0	01/08/2025	ND					

Surrogate: 1-Chlorooctane *93.5 %* *48.2-134*

Surrogate: 1-Chlorooctadecane *96.9 %* *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, LLC
SAMANTHA MACKENZIE
705 W WADLEY AVE.
MIDLAND TX, 79705
Fax To:

Received:	01/07/2025	Sampling Date:	01/07/2025
Reported:	01/13/2025	Sampling Type:	Soil
Project Name:	NIMITZ MDPI 12 FEDERAL 002H	Sampling Condition:	Cool & Intact
Project Number:	03B1417236	Sample Received By:	Alyssa Parras
Project Location:	OXY - EDDY CO NM		

Sample ID: DS 02 0.25' (H250066-02)

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	01/09/2025	ND	1.91	95.3	2.00	2.44	
Toluene*	<0.050	0.050	01/09/2025	ND	1.87	93.7	2.00	4.26	
Ethylbenzene*	<0.050	0.050	01/09/2025	ND	2.00	100	2.00	5.90	
Total Xylenes*	<0.150	0.150	01/09/2025	ND	6.04	101	6.00	5.76	
Total BTEX	<0.300	0.300	01/09/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID *106 %* *71.5-134*

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

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	01/08/2025	ND	416	104	400	3.77	

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	01/09/2025	ND	210	105	200	2.90	
DRO >C10-C28*	<10.0	10.0	01/09/2025	ND	205	103	200	2.67	
EXT DRO >C28-C36	<10.0	10.0	01/09/2025	ND					

Surrogate: 1-Chlorooctane *100 %* *48.2-134*

Surrogate: 1-Chlorooctadecane *106 %* *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, LLC
SAMANTHA MACKENZIE
705 W WADLEY AVE.
MIDLAND TX, 79705
Fax To:

Received:	01/07/2025	Sampling Date:	01/07/2025
Reported:	01/13/2025	Sampling Type:	Soil
Project Name:	NIMITZ MDPI 12 FEDERAL 002H	Sampling Condition:	Cool & Intact
Project Number:	03B1417236	Sample Received By:	Alyssa Parras
Project Location:	OXY - EDDY CO NM		

Sample ID: DS 03 0.25' (H250066-03)

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	01/09/2025	ND	1.91	95.3	2.00	2.44	
Toluene*	<0.050	0.050	01/09/2025	ND	1.87	93.7	2.00	4.26	
Ethylbenzene*	<0.050	0.050	01/09/2025	ND	2.00	100	2.00	5.90	
Total Xylenes*	<0.150	0.150	01/09/2025	ND	6.04	101	6.00	5.76	
Total BTEX	<0.300	0.300	01/09/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID *113 %* *71.5-134*

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

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	01/08/2025	ND	416	104	400	3.77	

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	01/09/2025	ND	210	105	200	2.90	
DRO >C10-C28*	<10.0	10.0	01/09/2025	ND	205	103	200	2.67	
EXT DRO >C28-C36	<10.0	10.0	01/09/2025	ND					

Surrogate: 1-Chlorooctane *94.7 %* *48.2-134*

Surrogate: 1-Chlorooctadecane *97.4 %* *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, LLC
SAMANTHA MACKENZIE
705 W WADLEY AVE.
MIDLAND TX, 79705
Fax To:

Received:	01/07/2025	Sampling Date:	01/07/2025
Reported:	01/13/2025	Sampling Type:	Soil
Project Name:	NIMITZ MDPI 12 FEDERAL 002H	Sampling Condition:	Cool & Intact
Project Number:	03B1417236	Sample Received By:	Alyssa Parras
Project Location:	OXY - EDDY CO NM		

Sample ID: DS 04 0.25' (H250066-04)

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	01/08/2025	ND	1.66	83.2	2.00	3.27	
Toluene*	<0.050	0.050	01/08/2025	ND	1.78	88.9	2.00	2.42	
Ethylbenzene*	<0.050	0.050	01/08/2025	ND	1.71	85.3	2.00	2.07	
Total Xylenes*	<0.150	0.150	01/08/2025	ND	4.98	83.0	6.00	1.93	
Total BTEX	<0.300	0.300	01/08/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID *95.2 %* *71.5-134*

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

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	01/08/2025	ND	416	104	400	3.77	

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	01/09/2025	ND	171	85.7	200	7.39	
DRO >C10-C28*	<10.0	10.0	01/09/2025	ND	165	82.3	200	10.5	
EXT DRO >C28-C36	<10.0	10.0	01/09/2025	ND					

Surrogate: 1-Chlorooctane *82.7 %* *48.2-134*

Surrogate: 1-Chlorooctadecane *73.6 %* *49.1-148*

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Analytical Results For:

ENSOLUM, LLC
SAMANTHA MACKENZIE
705 W WADLEY AVE.
MIDLAND TX, 79705
Fax To:

Received:	01/07/2025	Sampling Date:	01/07/2025
Reported:	01/13/2025	Sampling Type:	Soil
Project Name:	NIMITZ MDPI 12 FEDERAL 002H	Sampling Condition:	Cool & Intact
Project Number:	03B1417236	Sample Received By:	Alyssa Parras
Project Location:	OXY - EDDY CO NM		

Sample ID: DS 05 0.25' (H250066-05)

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	01/08/2025	ND	1.66	83.2	2.00	3.27	QR-03
Toluene*	<0.050	0.050	01/08/2025	ND	1.78	88.9	2.00	2.42	QR-03
Ethylbenzene*	<0.050	0.050	01/08/2025	ND	1.71	85.3	2.00	2.07	QR-03
Total Xylenes*	<0.150	0.150	01/08/2025	ND	4.98	83.0	6.00	1.93	QR-03
Total BTEX	<0.300	0.300	01/08/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID *94.4 %* *71.5-134*

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

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	01/08/2025	ND	416	104	400	3.77	

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	01/09/2025	ND	171	85.7	200	7.39	
DRO >C10-C28*	<10.0	10.0	01/09/2025	ND	165	82.3	200	10.5	
EXT DRO >C28-C36	<10.0	10.0	01/09/2025	ND					

Surrogate: 1-Chlorooctane *84.5 %* *48.2-134*

Surrogate: 1-Chlorooctadecane *74.7 %* *49.1-148*

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Notes and Definitions

QR-03	The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to matrix interference. QC batch accepted based on LCS and/or LCSD recovery and/or RPD values.
BS-3	Blank spike recovery outside of lab established statistical limits, but still within method limits. Data is not adversely affected.
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

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Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name:	Ensolum, LLC
Project Manager:	Samantha Mackenzie
Address:	601 N Marienfeld Street, Suite 400
City:	Midland **State:** TX **Zip:** 79701
Phone #:	703-357-3545 **Fax #:**
Project #:	03B1417236 **Project Owner:**
Project Name:	Nimitz MDPI 12 Federal 002H
Project Location:	Eddy County, NM
Sampler Name:	Noah Duker

BILL TO

P.O. #:	
Attn: Wade Dittrich	
Address:	
City:	
State:	**Zip:**
Phone #	
Fax #:	

ANALYSIS REQUEST

FOR LAB USE ONLY Lab I.D.	Sample I.D.	Depth (feet)	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX: GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	PRESERV.: ACID/BASE:	ICE / COOL	OTHER :	SAMPLING: DATE	TIME	BTEX 8021	TPH 8015	Chloride 4500
H250006																		
1	DS01	0.25'	G	1			X					X		1/7/25	1121	X	X	X
2	DS02	0.25'	G	1			X					X		1/7/25	1122	X	X	X
3	DS03	0.25'	G	1			X					X		1/7/25	1123	X	X	X
4	DS04	0.25'	G	1			X					X		1/7/25	1124	X	X	X
5	DS05	0.25'	G	1			X					X		1/7/25	1125	X	X	X
	NFE NM	1/7/25																

Relinquished By:	**Date:** 1-7-25	**Received By:**	**Verbal Result:** ☐ Yes ☐ No **Add'l Phone #:**
	Time: 1603		**All Results are emailed. Please provide Email address:**
Relinquished By:	**Date:**	**Received By:**	**REMARKS:**
	Time:		

Delivered By: (Circle One) Sampler - UPS - Bus - Other:	Observed Temp. °C 3.9 / Corrected Temp. °C 3.3	**Sample Condition** Cool: ☑ Yes ☐ No Intact: ☑ Yes ☐ No	**CHECKED BY: (Initials)** AD	**Turnaround Time:** Standard ☑ Rush ☐ AD 1-7-25 **Thermometer ID** #113 #140 **Correction Factor** -0.5°C -0.6 **Bacteria (only) Sample Condition** Cool: ☐ Yes ☐ No Intact: ☐ Yes ☐ No **Observed Temp. °C** **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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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 427119
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Prerequisites	
Incident ID (n#)	**nAPP2431326565**
Incident Name	**NAPP2431326565 NIMITZ MDP1 12 FEDERAL 002H @ 30-015-46319**
Incident Type	**Release Other**
Incident Status	**Remediation Plan Received**
Incident Well	**[30-015-46319] PALLADIUM MDP1 7 6 FEDERAL COM #172H**

Location of Release Source	
Please answer all the questions in this group.	
Site Name	NIMITZ MDP1 12 FEDERAL 002H
Date Release Discovered	11/04/2024
Surface Owner	Federal

Incident Details	
Please answer all the questions in this group.	
Incident Type	Release Other
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	Cause: Equipment Failure | Flow Line - Production | Crude Oil | Released: 15 BBL | Recovered: 10 BBL | Lost: 5 BBL.
Produced Water Released (bbls) Details	Cause: Equipment Failure | Flow Line - Production | Produced Water | Released: 15 BBL | Recovered: 10 BBL | Lost: 5 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)	produced water and produced oil release from white flex line

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QUESTIONS (continued)

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 427119
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

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	**Yes**
Reasons why this would be considered a submission for a notification of a major release	**From paragraph A. "Major release" determine using:** **(1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.**

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: Wade Dittrich Title: Environmental Coordinator Email: wade_dittrich@oxy.com Date: 01/31/2025

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QUESTIONS (continued)

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 427119
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

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)	Greater than 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between ½ and 1 (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 ½ and 1 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 100 and 200 (ft.)
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 1000 (ft.) and ½ (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	Yes

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	11/18/2024
On what date will (or did) the final sampling or liner inspection occur	01/27/2025
On what date will (or was) the remediation complete(d)	01/27/2025
What is the estimated surface area (in square feet) that will be reclaimed	1687
What is the estimated volume (in cubic yards) that will be reclaimed	63
What is the estimated surface area (in square feet) that will be remediated	1687
What is the estimated volume (in cubic yards) that will be remediated	63
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: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 427119
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

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.)	Yes
Which OCD approved facility will be used for **off-site** disposal	LEA LAND LANDFILL [fEEM0112342028]
OR which OCD approved well (API) will be used for **off-site** disposal	*Not answered.*
OR is the **off-site** disposal site, to be used, out-of-state	*Not answered.*
OR is the **off-site** disposal site, to be used, an NMED facility	*Not answered.*
(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)	*Not answered.*
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: Wade Dittrich Title: Environmental Coordinator Email: wade_dittrich@oxy.com Date: 01/31/2025
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: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 427119
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

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)

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 427119
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	**423401**
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	**01/27/2025**
What was the (estimated) number of samples that were to be gathered	**20**
What was the sampling surface area in square feet	**1687**

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	No

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CONDITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 427119
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

CONDITIONS

Created By	Condition	Condition Date
nvelez	Remediation plan is approved with the following conditions; 1. Variance to allow water well data that exceeds 25 years from the time of release is denied. Variance to forgo the wetland setback is also denied. When nearby wells are used to determine depth to groundwater, the wells should be preferably within ½ mile away from the site, and data should be no more than 25 years old. Additionally, with surface owners permission, you could physically measure the depth the water within the well that's 0.55 miles away if the water well is accessible. You may also request through the US Fish and Wildlife, that they may alter or eliminate the wetland category for your specific incident by demonstrating to them that the wetland isn't listed in the USGS National Water Dashboard and does not define this area as a "Freshwater Emergent Wetland".	2/17/2025
nvelez	2. Given the determination made in bullet #1, the closure standard for this release must meet Table I of 19.15.29.12 NMAC for groundwater < 50 feet unless the operator has taken the necessary action listed in bullet #1 and amends its remedation plan. 3. Prior to backfilling any open excavations per 19.15.29.12D (2) NMAC, the operator must collect a minimum of one (1) 5pcs from the media being used as backfill to verify that it meets non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, or other test methods approved by the division. This is especially important for the material being used within the top four (4) feet from the ground surface. 4. The operator has 90-days (May 19, 2025) to submit to OCD its appropriate or final remediation closure report.	2/17/2025