

August 15, 2025

New Mexico Oil Conservation Division

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

Re: Sampling Plan

James Ranch Unit #10 Battery

Incident Numbers NAB1521257588, NAB1535754357, and NAB1904653072

Eddy County, New Mexico

To Whom it May Concern:

Ensolum, LLC (Ensolum), on behalf of XTO Energy, Inc. (XTO), presents this *Sampling Plan* proposing confirmation soil sampling activities following the utilization of a solar soil vapor extraction (SVE) system at the James Ranch Unit #10 Battery (Site). The SVE system has been in operation since May 27, 2022, to remediate residual subsurface hydrocarbon impacts to soil at the Site. The following *Sampling Plan* proposes to complete confirmation soil sampling activities via drilling rig.

SITE DESCRIPTION AND BACKGROUND

The Site is located in Unit H, Section 1, Township 23 South, Range 30 East, in Eddy County, New Mexico at (32.33554°, -103.827553°) (Figure 1) and is associated with oil and gas exploration and production operations on Federal land managed by the Bureau of Land Management (BLM).

A VariSun Direct Solar SVE system was installed at the Site in accordance with an approved Revised Remediation Work Plan – SVE System (Revised Remediation Work Plan) prepared by LT Environmental, Inc. (LTE, dated October 30, 2019). The Revised Remediation Work Plan proposed the installation of an SVE system to address residual subsurface hydrocarbon impacted soil at the Site. The SVE system was installed following investigation of impacts to soil in regard to three releases that occurred in July 2015 (Incident Number NAB1521257588), December 2015 (Incident Number NAB1535754357), and January 2019 (Incident Number NAB1904653072). All three releases occurred within a tank battery containment area. Remedial activities prior to the installation of the SVE system included excavation of impacted soil, delineation activities via drilling rig, and installation of a 30-mil poly liner at a depth of 4 feet below ground surface (bgs) to address chloride impacts to soil not removed by excavation.

As documented in the approved *Revised Remediation Work Plan*, 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
- Total TPH: 2,500 mg/kg

Ensolum, LLC | Environmental, Engineering & Hydrogeologic Consultants 3122 National Parks Highway | Carlsbad, NM 88220 | ensolum.com

Chloride: 20,000 mg/kg

The NMOCD approved the *Revised Remediation Work Plan* report on July 12, 2021, and the report is provided in Appendix A.

SVE SYSTEM SPECIFICATIONS

The VariSun Direct Solar SVE system installed at the Site consisted of a 6.2 horsepower (HP) Pentair SST65 high efficiency regenerative blower capable of producing 250 cubic feet per minute (cfm) flow and a vacuum of 110 inches of water column (IWC). The system is powered by 12, 415-watt solar modules capable of producing 5 kilowatts (KW) of electricity. A motor controller automatically starts the system as soon as sunlight is available and increases the electrical output to the blower as solar power increases throughout the day.

Ten SVE wells (SVE01 through SVE06 and SVE-PT-01 through SVE-PT-04) are currently installed at the Site, as depicted on Figure 2. In order to target TPH and BTEX soil impacts at different depth intervals, the screened intervals of the SVE wells were installed in shallow, medium, and deep zones. Specifically, SVE wells SVE01, SVE02, SVE03, and SVE04 target shallow zone impacts and are screened at depths between 5 feet and 20 feet bgs. SVE wells SVE-PT-02, SVE-PT-03, and SVE-PT-04 target medium zone impacts and are screened between 15 feet and 30 feet bgs. SVE wells SVE05, SVE06, and SVE-PT-01 target deep zone impacts and are screened at depths between 25 feet and 65 feet bgs.

SECOND QUARTER 2025 SVE OPERATIONS AND EVENTS

As stated in the most recently submitted SVE update report, Second Quarter 2025 – Solar SVE System Update report (dated July 15, 2025), an operation and maintenance (O&M) technician was driving by the Site on June 16, 2025 and observed the SVE system disconnected from the anchors and flipped upside down, landing on the faces of the solar panels, likely due to recent high wind events. Upon further inspection, it was determined the existing system would no longer be operational without significant repairs and/or modifications to prevent similar incidents from occurring in the future. The SVE system was removed from the Site for storage at a nearby XTO yard. The most recent field documentation from the O&M Site visits, photographs of the SVE system post-wind event, and vapor sampling results were provided in the Second Quarter 2025 – Solar SVE System Update report, submitted to the NMOCD on July 21, 2025. The Second Quarter 2025 – Solar SVE System Update report is included in Appendix B.

PROPOSED CONFIRMATION SOIL SAMPLING PLAN

Due to the recent wind event in June 2025 that damaged the solar-powered SVE system beyond immediate repair, as well as a continuous decrease in total volatile petroleum hydrocarbons (TVPH) in vapor sampling results since the system was installed, XTO proposes to conduct confirmation soil sampling by use of drilling rig to assess the efficacy of the system and for potential Site closure. The proposed confirmation sampling activities are in accordance with the approved *Revised Remediation Work Plan*.

Four soil borings (DBH01, DBH07, DBH08, and DPH01 shown on Figure 2) will be advanced to terminal depths ranging from 25 feet to 80 feet bgs for confirmation soil sampling. Boreholes DBH01, DBH07, DBH08, and DPH01 will be advanced in the vicinity of boreholes BH01, BH07, BH08, and pothole PH01, respectively. Soil will be field screened in each borehole at 5-foot intervals utilizing a calibrated PID. Discrete soil samples will be collected in each borehole at depths that previously indicated TPH and BTEX concentrations exceeding Closure Criteria. In order to compare the proposed soil boring locations to the tank battery containment area of where



James Ranch Unit #10 Battery

the releases occurred, satellite imagery presented on Figure 2 is from 2017. Anticipated sampling depths at a minimum in each borehole include:

- DBH01 at 35 feet, and 80 feet bgs
- DBH07 at 5 feet, 30 feet, and 35 feet bgs
- DBH08 at 5 feet, 25 feet, 30 feet, 55 feet, and 74 feet bgs
- DPH01 at 6 feet, and 25 feet bgs.

In addition to the anticipated soil sampling depths listed above, if not covered by the proposed depths above, one soil sample at the depth interval with the highest PID field screening measurement, and/or one sample at the terminus of each boring will be collected and submitted for laboratory analysis. Drilling methods to complete the confirmation soil sampling activities will be via sonic or hollow stem auger with split spoon soil sampling. The confirmation soil samples will be submitted to a New Mexico approved laboratory for the following constituents of concern (COCs): BTEX following United States Environmental Protection Agency (EPA) Method 8021B and TPH-GRO, TPH-DRO, and TPH-oil range organics (ORO) following EPA Method 8015M/D.

XTO believes this *Sampling Plan* is protective of human health, the environment, and groundwater. As such, XTO requests approval of this *Sampling Plan* by NMOCD. Drilling activities will be scheduled within 30 days of the date of approval of the *Sampling Plan* by the NMOCD. A *Remediation Work Plan* or *Closure Request* will be submitted within 30 days following final receipt of laboratory analytical data.

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

Sincerely, **Ensolum**, **LLC**

Benjamin J. Belill Senior Geologist (989) 854-0852 bbelill@ensolum.com

cc: Colton Brown, XTO Toby Shultz, XTO Kaylan Dirkx, XTO

Dr.J. Delill

BLM

Attachments:

Figure 1 Site Location Map

Figure 2 Confirmation Soil Sampling Locations

Appendix A Revised Remediation Work Plan – SVE System, dated October 30, 2019 Appendix B Second Quarter 2025 – Solar SVE System Update, dated July 15, 2025

Daniel R. Moir, PG (Licensed in WY & TX)

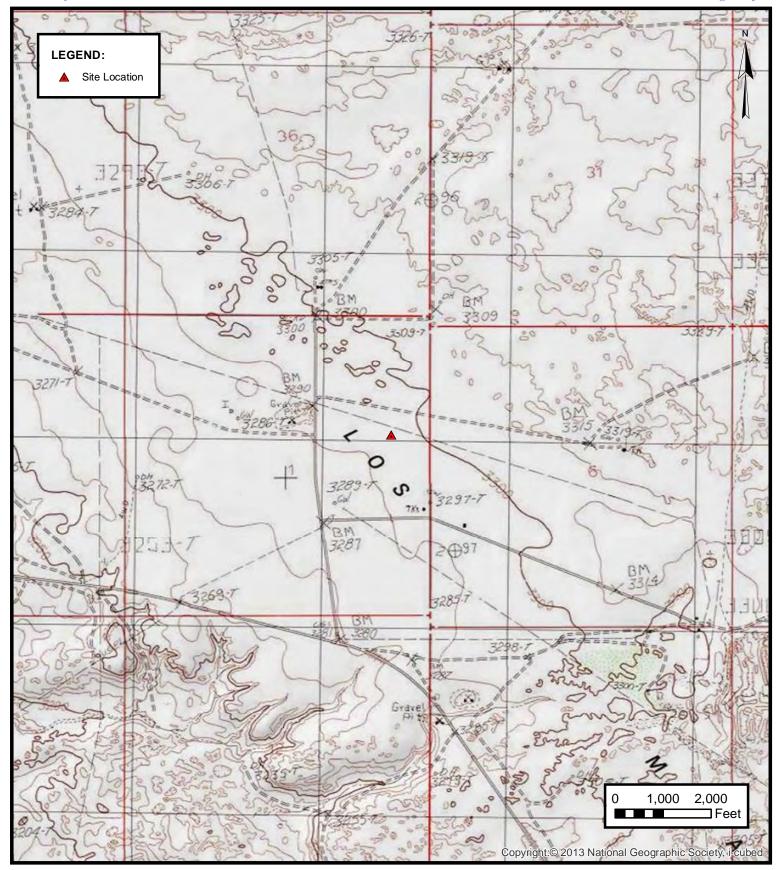
Senior Managing Geologist

(303) 887-2946

dmoir@ensolum.com



FIGURES

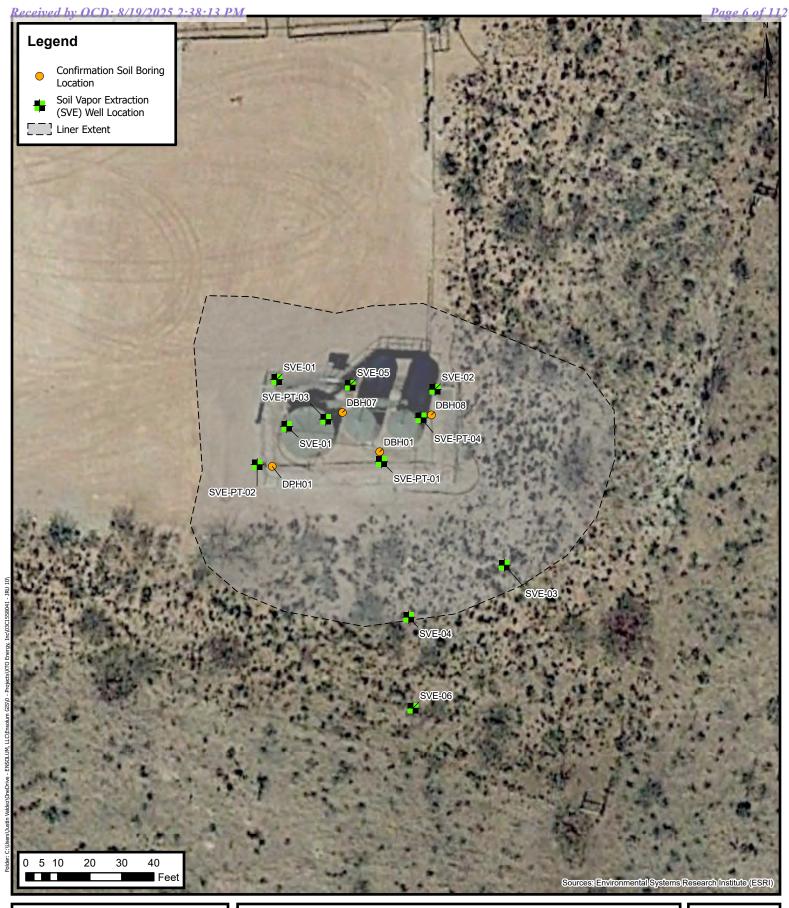




Site Location Map

XTO Energy, Inc JRU 10 Incident Number: NAB1521257588 ,NAB1535754357, & NAB1904653072 Unit H, Section 01, T 23S, R 30E Eddy County, New Mexico **FIGURE**

1





Confirmation Soil Sample Location

XTO Energy, Inc JRU 10 Incident Number: NAB1521257588 ,NAB1535754357, & NAB1904653072 Unit H, Section 01, T 23S, R 30E Eddy County, New Mexico FIGURE 2



APPENDIX A

Revised Remediation Work Plan – SVE System dated October 30, 2019

NM OIL CONSERVATION

ARTESIA DISTRICT

Form C-141 Revised August 8, 2011 Submit Copy to appropriate District Office in accordance with 19.15,29 NMAC.

DEC 2 2 2015

District | 1625 N. French Dr., Hobbs, NM 88240; District II B11 S. First St., Artesia, NM 88210 District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources

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

Release Notification and Corrective Action

NABI	535	154-35	7			OPERA	OR		⊠ Initia	al Report		Final Report
Name of Co	ompany: B	OPCO, L.P.	0	100737		Contact: An						A
				bad, N.M. 88220			lo. 575-887-73					
Facility Nat	me: Jame	s Ranch Uni	#10 Bal	tery		Facility Typ	e: Exploration	and Pro	duction			
Surface Owner: Federal Mineral Owner						Federal			API No	. 30-015-2	3075	
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tr. Mr.						N/A						
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Signature:						OIL CONSERVATION DIVISION Approved by Environmental Specialist:						
Printed Name	e: A	my & Ruth				Chbrosen ga	ENAME OF STREET	-	11	70	<u></u>	_
Title: Ren	nediation-S	pecialist				Approval Da	e: 12 23	3115	Expiration	Date: N	A	
E-mail Address: ACRuth@basspet.com Date: 12/22/2015 Phone: 432-661-0571						Conditions of Approval: Remediation per O.C.D. Rules & Guidelinesed						
Attach Addi	itional She	ets If Necess				LATER TH	IAN:	4114			2RI	P.3464

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources Department

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Form C-141 Revised August 24, 2018 Submit to appropriate OCD District office

Incident ID	DESCRIPTION AND
District RP	2RP-3464
Facility ID	Manager St.
Application ID	

Release Notification

Responsible Party

	Responsible Party: XTO Energy, Inc				OGRID: 5380		
Contact Name: Kyle Littrell				Contact Telephone: (432)-221-7331			
Contact email: Kyle_Littrell@xtoenergy.com				Incident #: 2RP-3464			
Contact mail NM 88220	Contact mailing address 522 W. Mermod, Suite 704 Carlsbad, NM 88220						
			Location	of Release S	Source		
atitude 32.3	35560		Marie Val	Longitude	-103.827584		
			(NAD 83 in deci	mal degrees to 5 dec	cimal places)		
Site Name Ja	mes Ranch	Unit #10 Battery	1 191-29	Site Type	Exploration and Production		
Datc Release	Discovered	12/14/15		API# (if a	pplicable) 30-015-23075		
Unit Letter	Section	Township	Dange	C	unty		
H	1	23S	Range 30E		ldy		
			Nature and	Volume of	Release		
			that apply and attach o	(6 - 7) -2/	fic justification for the volumes provided below)		
☐ Crude Oil		l(s) Released (Select all Volume Released	that apply and attach o	(6 - 7) -2/			
			that apply and attach of (bbls)	(6 - 7) -2/	fic justification for the volumes provided below)		
		Volume Released Volume Released Is the concentration	that apply and attach of (bbls) I (bbls) 81 on of dissolved ch	calculations or specif	Volume Recovered (bbls)		
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Form C-141 Page 2

State of New Mexico Oil Conservation Division

Incident ID	
District RP	2RP-3464
Facility ID	Burney and the
Application ID	

release as defined by	If YES, for what reason(s) does	
19.15.29.7(A) NMAC?	The release was greater than 25	bbls.
Yes No		
		n? To whom? When and by what means (phone, email, etc)? atcher/ Heather Patterson (NMOCD), and Jim Amos (BLM) on 12/14/15.
	In	itial 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 rel	ease has been stopped.	
The impacted area ha	as been secured to protect human h	nealth and the environment.
Released materials h	ave been contained via the use of b	perms or dikes, absorbent pads, or other containment devices.
		moved and managed appropriately
All free liquids and r If all the actions describe	ed above have <u>not</u> been undertaken	
If all the actions describe Per 19.15.29.8 B. (4) NN has begun, please attach	AAC the responsible party may con a narrative of actions to date. If	, explain why: mmence remediation immediately after discovery of a release. If remediation
Per 19.15.29.8 B. (4) NM has begun, please attach within a lined containme I hereby certify that the inforegulations all operators are public health or the environ failed to adequately investig	MAC the responsible party may con a narrative of actions to date. If ant area (see 19.15.29.11(A)(5)(a) is prequired to report and/or file certain rement. The acceptance of a C-141 report and remediate contamination that	mmence remediation immediately after discovery of a release. If remediation remedial efforts have been successfully completed or if the release occurred
Per 19.15.29.8 B. (4) NN has begun, please attach within a lined containme I hereby certify that the inforegulations all operators are public health or the environ failed to adequately investigaddition, OCD acceptance cand/or regulations.	MAC the responsible party may con a narrative of actions to date. If ant area (see 19.15.29.11(A)(5)(a) is prequired to report and/or file certain rement. The acceptance of a C-141 report and remediate contamination that	mmence remediation immediately after discovery of a release. If remediation remedial efforts have been successfully completed or if the release occurred NMAC), please attach all information needed for closure evaluation. Lete to the best of my knowledge and understand that pursuant to OCD rules and elease notifications and perform corrective actions for releases which may endanger but by the OCD does not relieve the operator of liability should their operations have pose a threat to groundwater, surface water, human health or the environment. In
Per 19.15.29.8 B. (4) NN has begun, please attach within a lined containme I hereby certify that the inforegulations all operators are public health or the environ failed to adequately investig addition, OCD acceptance cand/or regulations.	MAC the responsible party may con a narrative of actions to date. If ant area (see 19.15.29.11(A)(5)(a) is prequired to report and/or file certain runent. The acceptance of a C-141 report and remediate contamination that of a C-141 report does not relieve the of	mmence remediation immediately after discovery of a release. If remediation remedial efforts have been successfully completed or if the release occurred NMAC), please attach all information needed for closure evaluation. Lete to the best of my knowledge and understand that pursuant to OCD rules and clease notifications and perform corrective actions for releases which may endanger but by the OCD does not relieve the operator of liability should their operations have pose a threat to groundwater, surface water, human health or the environment. In operator of responsibility for compliance with any other federal, state, or local laws
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Per 19.15.29.8 B. (4) NN has begun, please attach within a lined containme I hereby certify that the inforegulations all operators are public health or the environ failed to adequately investig addition, OCD acceptance of and/or regulations. Printer Name: Kyl	MAC the responsible party may con a narrative of actions to date. If ont area (see 19.15.29.11(A)(5)(a) is permation given above is true and compete required to report and/or file certain rement. The acceptance of a C-141 report and remediate contamination that of a C-141 report does not relieve the of a C-141 report does not re	mmence remediation immediately after discovery of a release. If remediation remedial efforts have been successfully completed or if the release occurred NMAC), please attach all information needed for closure evaluation. Lete to the best of my knowledge and understand that pursuant to OCD rules and elease notifications and perform corrective actions for releases which may endanger both the OCD does not relieve the operator of liability should their operations have pose a threat to groundwater, surface water, human health or the environment. In operator of responsibility for compliance with any other federal, state, or local laws Title: SH&E Coordinator Date: 4/12/2019

ate of New Mexico Page 11 of 112

Incident ID	[CTTANKTANK
District RP	2RP-3464
Facility ID	
Application ID	

Site Assessment/Characterization

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?	>150 (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ⊠ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ⊠ No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ⊠ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ⊠ No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ⊠ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ⊠ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☑ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ⊠ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ⊠ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	Yes X No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ⊠ No
Did the release impact areas not on an exploration, development, production, or storage site?	☐ Yes ⊠ No
Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and ver contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.	rtical extents of soil
Characterization Report Checklist: Each of the following items must be included in the report.	
 Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring well Field data Data table of soil contaminant concentration data Depth to water determination Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release Boring or excavation logs Photographs including date and GIS information 	ls.

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

Topographic/Aerial maps

□ Laboratory data including chain of custody

Received by OCD: 8/19/2025 2:38:13 PM1 Form C-141 State of New Mexico Page 4 Oil Conservation Division Incident ID
District RP
Facility ID
Application ID

I hereby certify that the information given above is true and complete to the regulations all operators are required to report and/or file certain release no public health or the environment. The acceptance of a C-141 report by the failed to adequately investigate and remediate contamination that pose a threaddition, OCD acceptance of a C-141 report does not relieve the operator of and/or regulations.	tifications and perform corrective actions for releases which may endanger OCD does not relieve the operator of liability should their operations have reat to groundwater, surface water, human health or the environment. In
Printed Name:Kyle Littrell_	Title: SH&E Supervisor
Signature:	Date: _10/30/2019
email:Kyle_Littrell@xtoenergy.com	Telephone:(432)-221-7331
OCD Only	
Received by:	Date:

Received by OCD: 8/19/2025 2:38:13 PM1 Form C-141 State of New Mexico Page 5 Oil Conservation Division

Remediation Plan Checklist: Each of the following items must be included in the plan.

Incident ID nAB1535754357

District RP 2RP-3464

Facility ID Application ID

Remediation Plan

Detailed description of proposed remediation technique Scaled sitemap with GPS coordinates showing delineation points Estimated volume of material to be remediated Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)								
Deferral Requests Only: Each of the following items must be con	afirmed as part of any request for deferral of remediation.							
	roduction equipment where remediation could cause a major facility							
Extents of contamination must be fully delineated.								
Contamination does not cause an imminent risk to human health	n, the environment, or groundwater.							
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.								
Printed Name:Kyle Littrell	Title:SH&E Supervisor							
Signature:	Date:10/30/2019							
email:Kyle_Littrell@xtoenergy.com Telephone:(432)-221-7331								
OCD Only								
Received by:	Date:							
Approved	Approval Denied Deferral Approved							
Signature:	<u>Date:</u>							



LT Environmental, Inc.

3300 North "A" Street

Building 1, Unit 103

Midland, Texas 79705

432.704.5178

October 30, 2019

Mr. Mike Bratcher New Mexico Oil Conservation Division 811 South First Street Artesia, New Mexico 88210

RE: Revised Remediation Work Plan – SVE System

James Ranch Unit #10 Battery

Remediation Permit Numbers 2RP-3179, 2RP-3464, and 2RP-5243

Eddy County, New Mexico

Dear Mr. Bratcher:

LT Environmental, Inc. (LTE), on behalf of XTO Energy, Inc. (XTO), is pleased to present the New Mexico Oil Conservation Division (NMOCD) with this Revised Remediation Work Plan (Work Plan) for the James Ranch Unit #10 Battery (Site). The Site is located in Unit H, Section 1, Township 23 South, Range 30 East, in Eddy County, New Mexico (Figure 1).

This Work Plan summarizes the release history, assessment, and remediation activities completed to date and the proposed remedial actions, specifically the installation and operation of a soil vapor extraction (SVE) system, to address residual subsurface soil impacts at the Site. The Work Plan is submitted to comply with Title 19, Chapter 15, Part 29 (19.15.29) of the New Mexico Administrative Code (NMAC) as amended on August 14, 2018 and Bureau of Land Management (BLM) requirements for no further actions related to these releases. The Work Plan addresses comments from the NMOCD to conduct active remediation of subsurface hydrocarbon impacts.

BACKGROUND

Of the three open Remediation Permits (RPs) at the Site, two of the RPs (2RP-3179 and 2RP-3464) occurred while the facility was operated by the previous operator; however, XTO is the current operator and is committed to addressing any releases that remain unresolved. The releases were reported to NMOCD on a Release Notification and Corrective Action Form C-141 (Form C-141) and were assigned RP Numbers, which are included as Attachment 1.

Since the three releases occurred in the tank battery containment area, excavation and sampling activities were completed to address the three releases concurrently. RP Numbers 2RP-3179 and 2RP-3464 are included in the Compliance Agreement for Remediation for Historical Releases (Compliance Agreement) between XTO and NMOCD, effective November 13, 2018. The purpose of the Compliance Agreement is to ensure reportable releases that occurred prior to August 14, 2018, where XTO is responsible for the corrective action, comply with 19.15.29 NMAC. The



releases are categorized as a Tier III sites in the Compliance Agreement, meaning remediation of the releases began prior to August 14, 2018, the effective date of 19.15.29 NMAC; however, remediation was ongoing.

Spill response activities at the Site included excavation of impacted soil from February through April of 2019. Following initial excavation activities, LTE drilled into the subsurface with a hollow stem auger drilling rig to depths ranging from approximately 10 feet to 80 feet below ground surface (bgs) to vertically delineate subsurface soil impacts. Based on results from the drilling event, a production tank was relocated, and additional excavation was conducted. A liner was proposed in a Proposed Remediation Work Plan, dated April 12, 2019, and subsequently installed to address impacts to soil not removed by excavation. The Proposed Remediation Work Plan was denied with comments from NMOCD and BLM concerning depth to groundwater, additional delineation, and active remediation of mobile petroleum hydrocarbons in the subsurface. As a result, LTE submitted a Revised Remediation Work Plan, dated June 28, 2019. The Revised Remediation Work Plan summarized additional delineation by sonic drill rig, confirmation of depth to groundwater as greater than 150 feet bgs, and an analysis of exposure pathways to nearby receptors.

The additional drilling data allowed for revision of Closure Criteria presented in earlier reports. The following NMOCD Table 1 Closure Criteria were determined for the Site:

- Benzene: 10 milligrams per kilogram (mg/kg);
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg;
- <u>Total petroleum hydrocarbons gasoline range organics (TPH-GRO) and total</u> petroleum hydrocarbons diesel range organics (TPH-DRO): 1,000 mg/kg
- Total TPH: 2,500 mg/kg; and
- Chloride: 20,000 mg/kg.

The Revised Remediation Work Plan supported excavation and liner installation, relocation of the tank battery, and continued natural attenuation of residual subsurface soil impacts beneath the liner.

NMOCD denied the Revised Remediation Work Plan on July 25, 2019, and required a method for mitigating the deeper impacts, specifically, the light end hydrocarbons at depth. In response, LTE has evaluated remediation alternatives for the Site and conducted pilot testing for an SVE system. The result of these efforts is presented in the subsequent sections of this report and were used to design an active remedial approach to address petroleum hydrocarbons that exist deeper than is practical to excavate.





Completed Remediation Activities

As outlined in the Revised Remediation Action Plan submitted on June 28, 2019, XTO has performed the following remedial actions to address the releases associated with RP Numbers 2RP-3179, 2RP-3464, and 2RP-5243:

- Free standing crude oil and produced water were vacuumed off the well pad to minimize saturation into surficial soil and future vertical migration;
- Excavation and disposal of produced water and crude oil impacted soil from the top 4
 feet. Surficial soil impacts have been remediated to 4 feet bgs as determined by field
 screening and laboratory analytical results for confirmation sidewall soil samples and
 delineation soil samples. Approximately 1,740 cubic yards of impacted soil were
 excavated and disposed of between February and April 2019; and
- A 30-mil poly liner was installed at the base of the excavation on April 12, 2019 to address any elevated subsurface chloride concentrations. The liner covered a surface area of approximately 11,230 square feet and extended up the sidewalls approximately 2 to 3 feet;
- To minimize the potential of future releases in the vicinity of these three open RPs, XTO constructed their tank battery in a different location within the Site. In addition, XTO evaluated the integrity of all equipment and components utilized in the construction of the tank battery to reduce the likelihood of future releases due to faulty and/or worn equipment and/or components.

SOIL VAPOR EXTRACTION PILOT TEST

LTE conducted an SVE pilot test to assess the viability of SVE to reduce and remediate residual petroleum hydrocarbon impacts as an alternative remediation approach. The petroleum hydrocarbon impacts are generally volatile (relatively high Henry's Constant) and amenable to microbial degradation processes. SVE has been an industry standard, cost effective technology for *in-situ* remediation of petroleum hydrocarbons. The objective of the SVE pilot test was to evaluate the effectiveness of the remedial technology to achieve site remediation cleanup goals. SVE pilot testing results assist in determining the required flow rate and applied vacuum to influence the subsurface and cause volatilization of petroleum hydrocarbons adsorbed to subsurface soil and to determine site-specific design radius of influence (ROI). The pilot testing program was designed based on previously observed geologic conditions, surface conditions, and current lateral and vertical extents of petroleum hydrocarbon impacts. Two SVE screen depths were tested (25 feet to 45 feet bgs and 15 feet to 30 feet bgs) to encourage uniform flow throughout the highest impacted interval (20 feet to 45 feet bgs).





SVE Well Installation

Four SVE wells (SVE-PT-01 through SVE-PT-04) were installed prior to testing in the locations presented on Figure 2. During the advancement of each SVE well, continuous soil sampling was conducted, which included describing the lithology based on the Unified Soil Classification System (USCS) as specified in American Society for Testing and Materials (ASTM) D2488, observations of staining and odors, and field screening of volatile aromatic hydrocarbons and chloride utilizing a calibrated photo-ionization detector (PID) and Hach® chloride QuanTab® test strips, respectively. Soil boring logs were completed at the time of drilling and are provided with the construction diagrams of the SVE wells as Attachment 2.

Soil samples from the four SVE wells were not submitted for laboratory analysis due to their proximity of previously drilled and sampled boreholes. Based on the soil boring logs and observations made during all subsurface investigations, lithology in the vicinity of the three releases was generally characterized as the following:

- 5 feet to 20 feet bgs was a mix of poorly graded to well graded sand, and
- 20 feet to approximately 50 feet bgs was classified as sandstone and claystone.

Soil boring SVE-PT-01 was completed to a depth of approximately 45 feet bgs, while SVE-PT-02, SVE-PT-03, and SVE-PT-04 were completed to a depth of approximately 30 feet bgs. The SVE wells were constructed with 2-inch polyvinyl chloride (PVC) casing. A 10-foot section of 0.010-inch slotted PVC screen was installed at the base of SVE wells SVE-PT-02 and SVE-PT-03. A 20-foot and 15-foot section of 0.010-inch slotted PVC screens were installed at the base of SVE wells SVE-PT-01 and SVE-PT-04, respectively. A 10-20 size silica sand pack was used to fill the annular space from the bottom of the screen to approximately 1 foot above the top of screen. Two feet of hydrated bentonite chips was placed on top of the sand pack. The well was then grouted from the top of the bentonite chips to the ground surface. The PVC casing for the SVE wells extended beyond the ground surface approximately 3 feet and protected with steel well protector monuments.

Pilot Testing Procedure

Vacuum was applied to two of the SVE wells (SVE-PT-01 and SVE-PT-04), while the other two SVE wells were utilized as observation wells (SVE-PT-02 and SVE-PT-03). SVE wells SVE-PT-02 and SVE-PT-03 will ultimately be utilized for full-scale SVE design. The SVE wells were screened across different lithologies observed in the subsurface to test applied vacuum responses and influence within those lithologies.

A vacuum was applied to the SVE wells via a vacuum truck and through a manifold designed to measure applied vacuum, flowrate, and vapor concentrations. The first test was conducted by applying a vacuum at SVE well SVE-PT-01. The same procedure was repeated for the pilot test on





SVE well SVE-PT-04. Pilot test monitoring data (applied vacuum, air flow rate, and volatile aromatic hydrocarbons stack measurements) were recorded at the test well, while (vacuum response) was measured at surrounding SVE wells during performance of the test. The following procedures were followed when conducting the SVE pilot test:

- 1. Measured the distances from the test SVE well to each observation well;
- 2. Collected background volatile organic compound measurements using a calibrated PID at the test SVE and observation wells;
- 3. Connected the vacuum truck to the test SVE well via a flexible hose and manifold then slowly opened the valve and monitored the vacuum and flow rate;
- 4. Applied a vacuum ranging from approximately 10 inches of water column (wc) to 50 inches wc at the designated SVE well for each test;
- Measured at least two events of stabilized vacuum/flow rate. Measured the vacuum at the observation wells and PID measurements from the test SVE well. Collected readings 15 minutes apart;
- After the test SVE well vacuum readings stabilized, the applied vacuum was increased by reducing the amount of blower bypass air and collected the above measurements at the higher vacuum/flow rate;
- 7. Closed the valve to eliminate the vacuum pressure and collected stabilization readings from each observation well;
- 8. At the conclusion of the testing period, the blower was turned off, the system was allowed to equilibrate, and a final round of vacuum readings was collected from the observation wells; and
- Collected air emission samples from SVE well SVE-PT-04 in laboratory-prepared containers and delivered under strict chain of custody (COC) protocol to Xenco Laboratories located in Midland, Texas (Xenco) for analysis of BTEX and total volatile petroleum hydrocarbons (TVPH).

The resulting field measurements were reviewed, and vacuum measurements were plotted versus distance from the appropriate SVE well. Diagrams were generated for each of the different vacuum/flowrates tested. All test forms and diagrams are provided as Attachment 3. The laboratory analytical report for the air emission sample is provided in Attachment 4.

SVE Pilot Test Results

Pilot test data appears to indicate SVE is a viable technology to remediate petroleum hydrocarbons at the Site. The introduction of a vacuum into the subsurface enhanced



volatilization of petroleum hydrocarbons throughout the tested impacted soil column. SVE vacuum influences were observed in all SVE wells during each test.

An effective SVE ROI of approximately 30 feet to 40 feet was graphically estimated from a plot of the observed vacuum response versus the distance from the applied vacuum. Influence of greater than 0.1 inches wc was observed during testing of SVE well SVE-PT-01 via vacuum and flow rates ranging from 10 inches wc at 4 actual cubic feet per minute (acfm) to 50 inches wc at 14 acfm. Influence of greater than 2.5 inches wc was observed during testing of SVE well SVE-PT-04 via vacuum and flow rates ranging from 10 inches wc at 60 acfm to 35 inches wc at 124 acfm. LTE believes a lower flow rate during testing of SVE well SVE-PT-04 would produce similar results. Full-scale design is based on 20 acfm per well at 30 inches wc.

The air emission sample collected during testing of SVE well SVE-PT-04 indicated recovery of total petroleum hydrocarbons – gasoline range organics (TPH-GRO) and BTEX. In the air stream, TPH-GRO was detected at a concentration of 20.2 milligrams per liter (mg/L) and total BTEX was detected at 0.957 mg/L. The air emission sample results are included as Table 1. At a full-scale design flow rate of 200 acfm, it is estimated the initial petroleum hydrocarbon removal rate would be as high as 360 pounds TPH per day and 17 pounds BTEX per day. As the system remediates subsurface soil, the removal rate is anticipated to decline via first order decline rate. The petroleum hydrocarbon concentration detected in the SVE pilot test emissions further demonstrates the technology is a viable remedial approach for the deeper subsurface soil impacts. Air emission samples will be collected during full scale system operation to track remediation progress and to model anticipated shutdown dates.

PROPOSED SVE SYSTEM DESIGN

An additional six SVE wells are recommended to influence the hydrocarbon impacted area in both the horizontal and vertical extents, for a total of 10 SVE wells. A well layout plan is included as Figure 3. Figures 4, 5, and 6 illustrate the SVE wells influencing different intervals at depths, 5 feet to 20 feet bgs, 15 feet to 30 feet bgs, and 25 feet to 65 feet bgs (shallow, medium, and deep), respectively. The well screened intervals are included as Table 2.

For the full-scale system, it is recommended that the vacuum blower be capable of at least 200 acfm at 50 inches wc. This would allow the system to operate 20 acfm per well at a vacuum of at least 30 inches wc. The SVE system will be powered with an electrical drop that will operate a regenerative or rotary lobe blower. The full-scale system will include a manifold with vacuum gauges to adjust system operations as necessary. Measurements of volatile organic compounds with a PID will be collected per zone or well to determine the area of the site to focus operations. Upon approval of this Work Plan, the remediation system equipment and parts will be sourced.

LTE anticipates the system will operate for a one to two-year period to remediate the residual subsurface impacts. An estimated timeline breakdown includes:





- Equipment sourcing, manufacturing, and delivery is expected to take 3 months and will be completed by January 31, 2020;
- Well installation is anticipated to take one week;
- System installation and startup is expected to take two weeks and will be completed by February 28, 2020;
- Operation and Maintenance (O&M) will be performed weekly for the first month after initial startup;
- Monthly O&M checks on the system will be performed over the lifecycle of the system;
- Air emission samples will be collected at startup, two weeks, one month, two months, three months, then quarterly for the lifecycle of the system;
- Quarterly reports documenting runtime, air emission sampling results, and O&M data with any system changes or recommendations will be provided to NMOCD;
- Once air monitoring results indicate a TPH concentration of below 1 mg/L and the system has operated for at least a one-year period, confirmation soil samples will be collected. If the stack emissions do not drop below 1 mg/L TPH then confirmation sampling will occur following two years of system operation; and
- Confirmation soil samples will be collected in the vicinity of boreholes BH01, BH07, and BH08 and pothole PH01. Continuous sampling will be conducted via field screenings with a PID. Samples will be collected from similar intervals exceeding the Closure Criteria and submitted for laboratory analysis of BTEX and TPH.

Should NMOCD require more than 30 days to review and respond to this report, XTO reserves the right to modify the proposed schedule.

LTE, on behalf of XTO, requests approval of this Work Plan and implementation of the SVE system. If you have any questions or comments, please do not hesitate to contact Mr. Robert Rebel at (303) 548-5097 or Ms. Ashley Ager at (970) 946-1093.

Sincerely,

LT ENVIRONMENTAL, INC.

Robert T Rebel

Robert Rebel, P.E. Senior Engineer Ashley L. Ager, P.G. Senior Geologist





cc: Kyle Littrell, XTO

Bradford Billings, NMOCD Robert Hamlet, NMOCD

Jim Amos, U.S. Bureau of Land Management

Attachments:

Figure 1	Site Location Map
Figure 2	FULL-SCALE SVE Pilot Test Layout
Figure 3	Proposed SVE System Layout
Figure 4	Shallow SVE Well Layout (5-20 feet bgs)
Figure 5	Medium SVE Well Layout (15-30 feet bgs)
Figure 6	Deep SVE Well Layout (25-65 feet bgs)

Table 1 Air Analytical Results
Table 2 SVE Well Completions

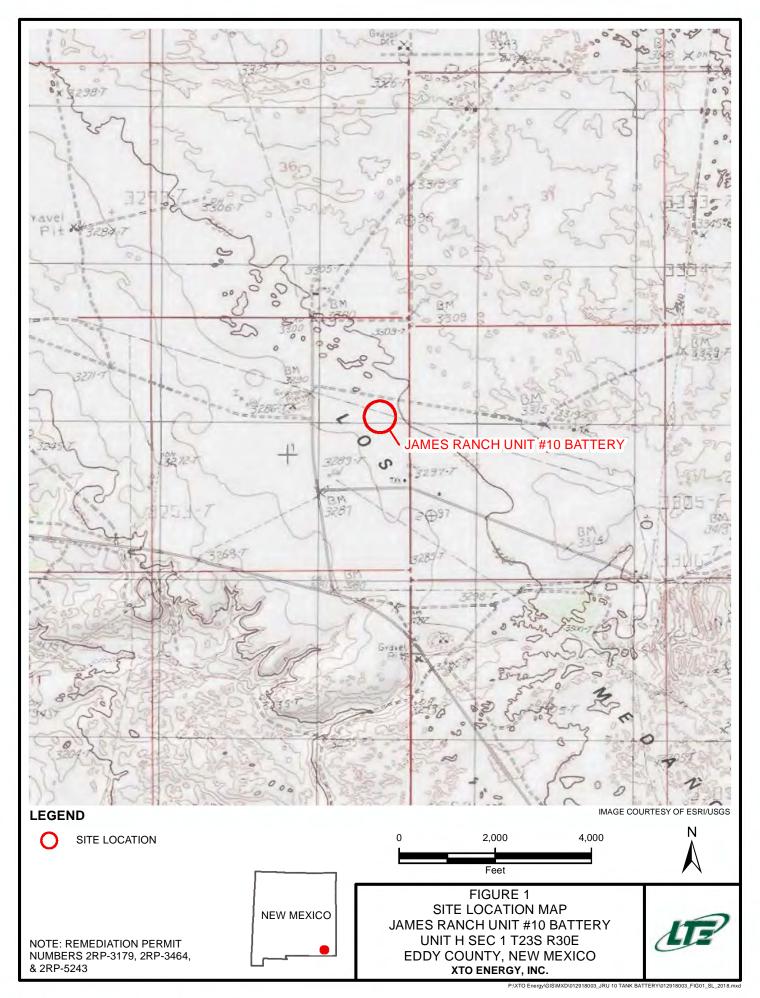
Attachment 1 Initial / Final NMOCD Form C-141s (2RP-3179, 2RP-3463, and 2RP-5243)

Attachment 2 Lithologic/Soil Sampling Logs

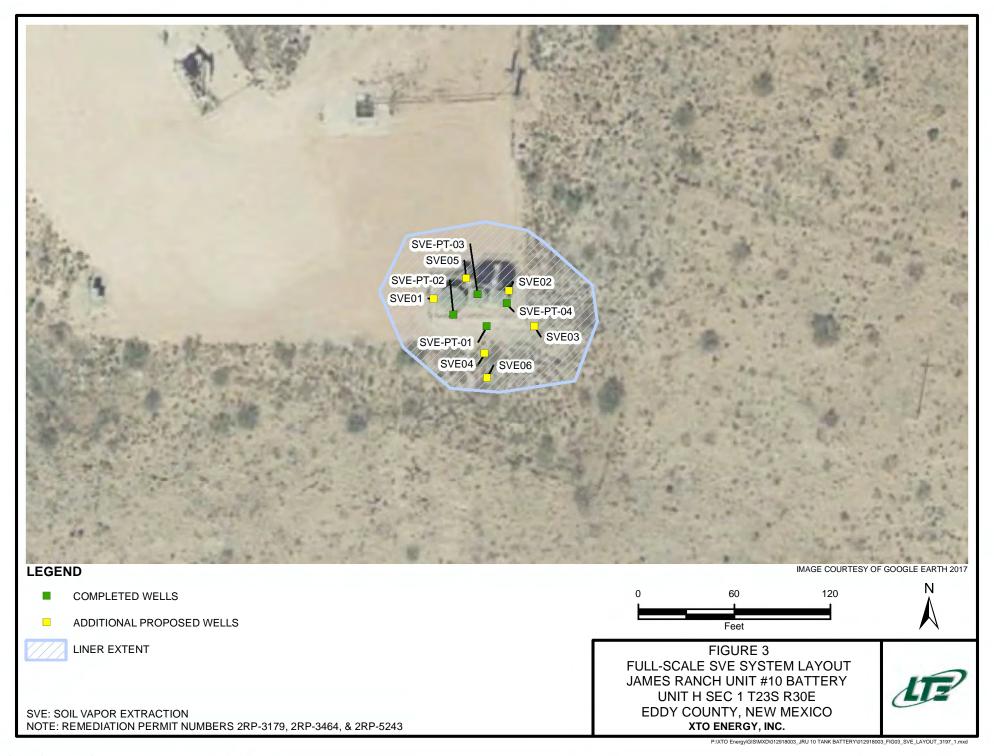
Attachment 3 Pilot Test Data

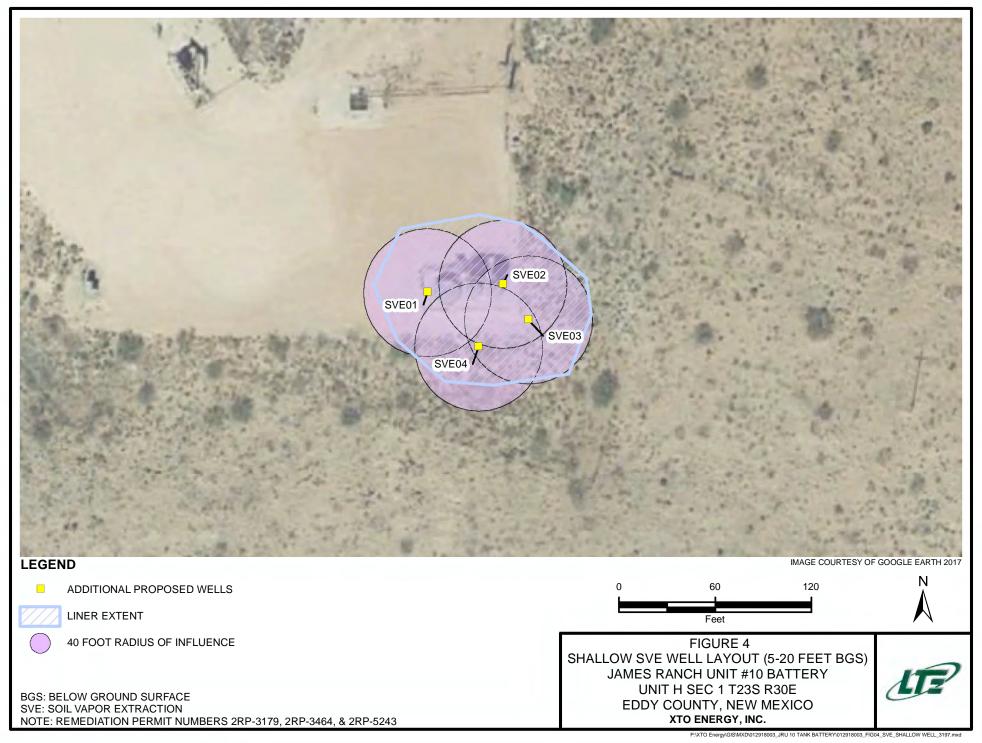
Attachment 4 Laboratory Analytical Report

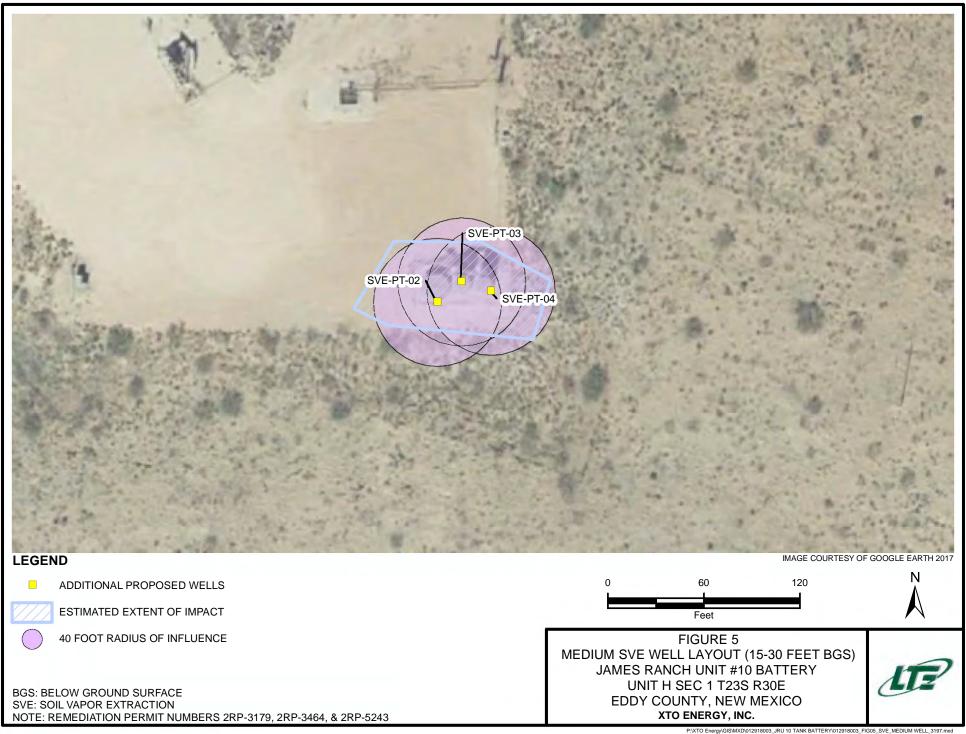












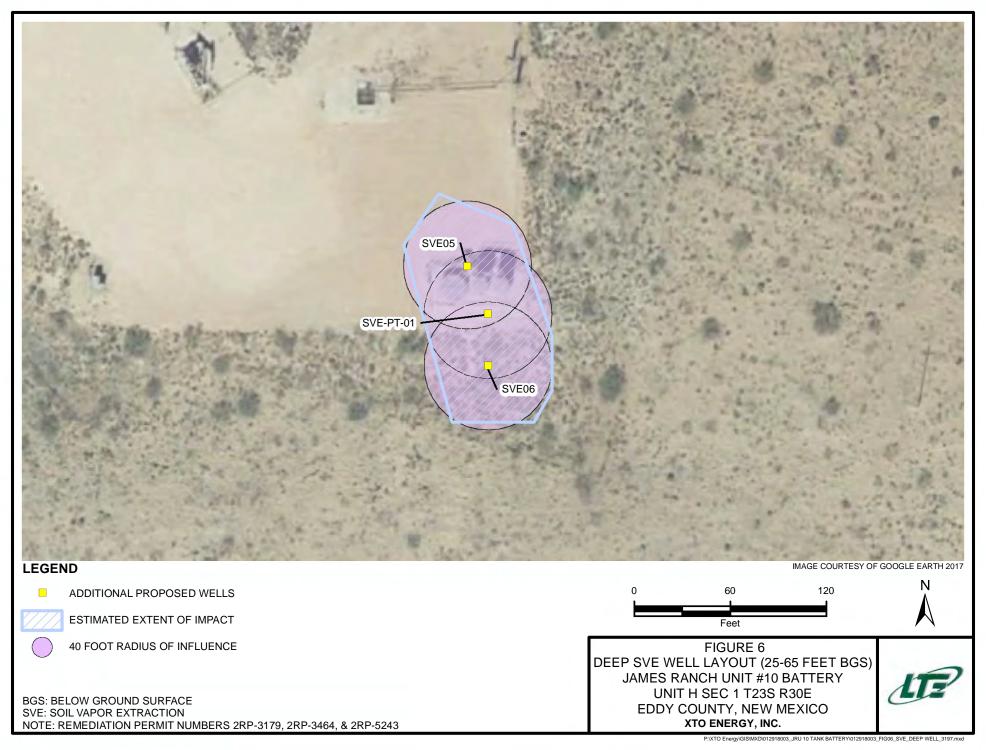


TABLE 1 AIR ANALYTICAL RESULTS

REVISED REMEDIATION WORK PLAN JAMES RANCH UNIT #10 BATTERY REMEDIATION PERMIT NUMBERS 2RP-3179, 2RP-3464, and 2RP-5243 EDDY COUNTY, NEW MEXICO XTO ENERGY, INC.

Sample Name	Sample Date	Benzene (mg/L)	Toluene (mg/L)	Ethyl-benzene (mg/L)	Total Xylenes (mg/L)	Total BTEX (mg/L)	TPH-GRO (mg/L)
SVE-PT-04	10/01/2019	0.0722	0.370	0.0208	0.494	0.957	20.2

Notes:

BTEX - benzene, toluene, ethylbenzene, and total xylenes

GRO - gasoline range organics

mg/L - milligrams per Liter

TPH - total petroleum hydrocarbons



JRU #10 - Soil Results Page 1 of 1

TABLE 2 SOIL VAPOR EXTRACTION (SVE) WELL COMPLETIONS

JAMES RANCH UNIT #10 BATTERY REMEDIATION PERMIT NUMBERS 2RP-3179, 2RP-3464, and 2RP-5243 EDDY COUNTY, NEW MEXICO XTO ENERGY, INC.

SOIL VAPOR EXTRACTION WELL	TOTAL DEPTH (FEET)	BENTONITE WELL SEAL (FEET)	SAND PACK (FEET)	CASING (FEET)	WELL SCREEN (FEET)
SVE-PT-01	45	28	17	25	20
SVE-PT-02	30	18	12	20	10
SVE-PT-03	30	18	12	20	10
SVE-PT-04	30	18	12	15	15
SVE-01	20	10	10	10	10
SVE-02	15	5	10	5	10
SVE-03	20	10	10	10	10
SVE-04	20	10	10	10	10
SVE-05	60	40	20	45	15
SVE-06	65	45	20	50	15

Notes:

Drill with auger rig

0.010 slot screen

SVE-PT wells were installed on September 18, 2019 for the pilot test

District I 1625 N. French Dr., Hahbs. NM 88240 District II 811 S. First St., Artesia. NM 88240 District III 1000 Rto Brazos Road, Aztec, NM 87410 District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources

Form C-141 Revised August 8, 2011

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

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1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources Department

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Form C-141 Revised August 24, 2018 Submit to appropriate OCD District office

Incident ID	
District RP	2RP-3179
Facility ID	
Application ID	

Release Notification

Responsible Party

Contact Name: Kyle			O Grab.	5380	
Comact Name: Kyle	ittrell		Contact	Telephone: (432)-221-7331	
Contact email: Kyle_	ittrell@xtoenergy.co	om	Incident #: 2RP-3179		
Contact mailing addre NM 88220	ss 522 W. Mermod, S	Suite 704 Carlsbad,			
		Location	of Release	Source	
atitude 32.335568		(NAD 83 in deci	Longitude mal degrees to 5 de	e -103.827592	
Site Name JRU-10	-		Site Type	e Exploration and Production	
Date Release Discover	ed 07/29/15		API# (if a	applicable) 30-015-23075	
Unit Letter Section	Township	Range	Co	unty	
Unit Letter Section H 1 urface Owner: Sta	238	Range 30E ibal Private (N	Eame: BLM	ddy Release	
H 1 urface Owner: Sta	23S e ⊠ Federal □ Tr	30E ibal Private (N Nature and	Ediame: BLM	Release fic justification for the volumes provided below)	
H 1 urface Owner: Sta	23S e ⊠ Federal □ Tr rial(s) Released (Select all Volume Release	30E ibal Private (N Nature and that apply and attach c d (bbls)	Ediame: BLM	Release fic justification for the volumes provided below) Volume Recovered (bbls)	
H 1 urface Owner: Sta	23S e ⊠ Federal □ Tr rial(s) Released (Select all Volume Released Volume Released	30E ibal Private (N Nature and that apply and attach of (bbls) d (bbls) 50	ame: BLM Volume of alculations or specifications.	Release fic justification for the volumes provided below) Volume Recovered (bbls) Volume Recovered (bbls) 13	
H 1 urface Owner: Sta	23S e ⊠ Federal □ Tr rial(s) Released (Select all Volume Released Volume Released	ibal Private (N Nature and that apply and attach of (bbls) d (bbls) 50 ion of dissolved ch	ame: BLM Volume of alculations or specifications.	Release fic justification for the volumes provided below) Volume Recovered (bbls)	
H 1 urface Owner: Sta Mate Crude Oil Produced Water	e Federal Tr	ibal Private (Notation of dissolved chibal) Atture and that apply and attach of d (bbls) d (bbls) 50 ion of dissolved chibal of dissolved chiba	ame: BLM Volume of alculations or specifications.	Release fic justification for the volumes provided below) Volume Recovered (bbls) Volume Recovered (bbls) 13	
H 1 urface Owner: Sta	23S e Federal Tr Trial(s) Released (Select all Volume Released Volume Released Is the concentrate produced water >	ibal Private (Notation of dissolved check of the poly and attached of the poly attac	ame: BLM Volume of alculations or specifications.	Release fic justification for the volumes provided below) Volume Recovered (bbls) Volume Recovered (bbls) 13 Yes No	

Form C-141 Page 2

State of New Mexico Oil Conservation Division

Incident ID		
District RP	2RP-3179	
Facility ID		
Application ID		

The responsible party must undertake the foldown of the release has been stopped. The impacted area has been secured to protect Released materials have been contained via All free liquids and recoverable materials has lift all the actions described above have not been within a lined containment area (see 19.15.29.1 I hereby certify that the information given above is tregulations all operators are required to report and/or public health or the environment. The acceptance of failed to adequately investigate and remediate contains.	on(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCT. Yes, by Tony Savoie to Mike Bratcher/Heather. The responsible party must undertake the fol The source of the release has been stopped. The impacted area has been secured to prote. Released materials have been contained via. All free liquids and recoverable materials have been described above have not been secured to prote as begun, please attach a narrative of actions within a lined containment area (see 19.15.29.1). Thereby certify that the information given above is tregulations all operators are required to report and/or public health or the environment. The acceptance of failed to adequately investigate and remediate contain addition, OCD acceptance of a C-141 report does not and/or regulations. Printed Name: Kyle Littrell Signature: Kyle Littrell	er than 25 bbls.
The responsible party must undertake the foldown of the release has been stopped. The impacted area has been secured to protect the impacted area has been contained via Released materials have been contained via All free liquids and recoverable materials has lift all the actions described above have not been within a lined containment area (see 19.15.29.1 I hereby certify that the information given above is tregulations all operators are required to report and/or public health or the environment. The acceptance of failed to adequately investigate and remediate contain addition, OCD acceptance of a C-141 report does not and/or regulations. Printed Name: Kyle Littrell Signature:	
The responsible party must undertake the foldown of the release has been stopped. The impacted area has been secured to protect Released materials have been contained via All free liquids and recoverable materials has lifted actions described above have not been within a lined containment area (see 19.15.29.1). I hereby certify that the information given above is tregulations all operators are required to report and/or public health or the environment. The acceptance of failed to adequately investigate and remediate contain addition, OCD acceptance of a C-141 report does not and/or regulations. Printed Name: Kyle Littrell Signature:	? By whom? To whom? When and by what means (phone, email, etc)?
☑ The source of the release has been stopped. ☑ The impacted area has been secured to prote ☑ Released materials have been contained via ☑ All free liquids and recoverable materials had If all the actions described above have not been Per 19.15.29.8 B. (4) NMAC the responsible particle has begun, please attach a narrative of actions within a lined containment area (see 19.15.29.1] I hereby certify that the information given above is tregulations all operators are required to report and/or public health or the environment. The acceptance of failed to adequately investigate and remediate contain addition, OCD acceptance of a C-141 report does not and/or regulations. Printed Name: Kyle Littrell Signature:	Patterson (NMOCD), and Jim Amos (BLM) on 7/29/2015.
☑ The source of the release has been stopped. ☑ The impacted area has been secured to prote ☑ Released materials have been contained via ☑ All free liquids and recoverable materials had If all the actions described above have not been Per 19.15.29.8 B. (4) NMAC the responsible particle has begun, please attach a narrative of actions within a lined containment area (see 19.15.29.1] I hereby certify that the information given above is tregulations all operators are required to report and/or public health or the environment. The acceptance of failed to adequately investigate and remediate contain addition, OCD acceptance of a C-141 report does not and/or regulations. Printed Name: Kyle Littrell Signature:	Initial Response
Released materials have been contained via Released materials have been contained via All free liquids and recoverable materials had lifted liquids and recoverable materials had lifted actions described above have not been have been been been lifted light li	owing actions immediately unless they could create a safety hazard that would result in injury
Released materials have been contained via All free liquids and recoverable materials had all the actions described above have not been been been been been been been bee	
Per 19,15,29.8 B. (4) NMAC the responsible partials has begun, please attach a narrative of actions within a lined containment area (see 19.15,29.1 I hereby certify that the information given above is tregulations all operators are required to report and/or public health or the environment. The acceptance of failed to adequately investigate and remediate contain addition, OCD acceptance of a C-141 report does not and/or regulations. Printed Name: Kyle Littrell Signature:	ct human health and the environment.
Per 19.15.29.8 B. (4) NMAC the responsible partial has begun, please attach a narrative of actions within a lined containment area (see 19.15.29.1 I hereby certify that the information given above is transplaced in the environment. The acceptance of failed to adequately investigate and remediate contain addition, OCD acceptance of a C-141 report does not and/or regulations. Printed Name: Kyle Littrell Signature:	the use of berms or dikes, absorbent pads, or other containment devices.
Per 19.15.29.8 B. (4) NMAC the responsible partial has begun, please attach a narrative of actions within a lined containment area (see 19.15.29.1). I hereby certify that the information given above is transferred to report and/or public health or the environment. The acceptance of failed to adequately investigate and remediate contain addition, OCD acceptance of a C-141 report does not and/or regulations. Printed Name: Kyle Littrell Signature:	ve been removed and managed appropriately.
I hereby certify that the information given above is tregulations all operators are required to report and/or public health or the environment. The acceptance of failed to adequately investigate and remediate contan addition, OCD acceptance of a C-141 report does not and/or regulations. Printed Name: Kyle Littrell Signature:	ty may commence remediation immediately after discovery of a release. If remediation date. If remedial efforts have been successfully completed or if the release occurred (A)(5)(a) NMAC), places attach all information needed for closure avaluation.
Signature: Signature:	the and complete to the best of my knowledge and understand that pursuant to OCD rules and file certain release notifications and perform corrective actions for releases which may endanger C-141 report by the OCD does not relieve the operator of liability should their operations have ination that pose a threat to groundwater, surface water, human health or the environment. In relieve the operator of responsibility for compliance with any other federal, state, or local laws
	Title: SH&E Coordinator
email: Kyle Littrell@xtoenergy.com	Date: 4/12/2019
Control of the contro	Telephone:432-221-7331
OCD Only	
Received by:	Date:

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Incident ID	2
District RP	2RP-3179
Facility ID	
Application ID	

Site Assessment/Characterization

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?	<u>>150</u> (ft bgs)			
Did this release impact groundwater or surface water?	☐ Yes ⊠ No			
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ⊠ No			
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ⊠ No			
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ⊠ No			
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ⊠ No			
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☒ No			
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ⊠ No			
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ⊠ No			
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ⊠ No			
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes 🏻 No			
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ⊠ No			
Did the release impact areas not on an exploration, development, production, or storage site?	☐ Yes ⊠ No			
Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.				
Change standard on Demont Charleton, Early of the fall and in it was account to in the district of the manner				

Char	acterization Report Checklist: Each of the following items must be included in the report.
Fi D D D D B P P T	caled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells. Field data Detata table of soil contaminant concentration data Depth to water determination Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release storing or excavation logs Chotographs including date and GIS information Copographic/Aerial maps Caboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

Received by OCD: 8/19/2025/2538613 PM State of New Mexico
Page 4 Oil Conservation Division

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.

Printed Name: Kyle Littrell Title: SH&E Supervisor

Signature: Date: 10/30/2019

email: Kyle Littrell@xtoenergy.com Telephone: (432)-221-7331

OCD Only

Received by: Date: _______

Page 38 lof 112

Incident ID	nAB1521257588
District RP	2RP-3179
Facility ID	
Application ID	

Remediation Plan

Remediation Plan Checklist: Each of the following items must be included in the plan.				
 Detailed description of proposed remediation technique Scaled sitemap with GPS coordinates showing delineation points Estimated volume of material to be remediated Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required) 				
Deferral Requests Only: Each of the following items must be confirmed as part of any request for deferral of remediation.				
Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.				
Extents of contamination must be fully delineated.				
Contamination does not cause an imminent risk to human health, the environment, or groundwater.				
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.				
Printed Name:Kyle Littrell_ Title:SH&E Supervisor				
Signature: Date: <u>10/30/2019</u>				
email:Kyle_Littrell@xtoenergy.com_ Telephone:(432)-221-7331				
OCD Only				
Received by: Date:				
Approved				
Signature: Bradford Billings Date: 07/12/2021				

District | 1625 N. French Dr., Hobbs, NM 88240; District II 811 S. First St., Artesia, NM 88210

NM OIL CONSERVATION

ARTESIA DISTRICT

DEC 2 2 2015

Form C-141 Revised August 8, 2011

Submit Copy to appropriate District Office in accordance with 19.15,29 NMAC.

State of New Mexico Energy Minerals and Natural Resources District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505

Oil Conservation Division 1220 South St. Francis Dr.

Santa Fe, NM 87505

	37	Contact: An	ny Ruth					
	4 00220							
willing blowns. Towner Banch Hale #10 Dates.	Address: 522 W. Mermod, Suite 704 Carlsbad, N.M. 88220			Telephone No. 575-887-7329				
Facility Name: James Ranch Unit #10 Battery			Facility Type: Exploration and Production					
Surface Owner: Federal Mineral Owner:				APIN	5. 30-015-23075			
	LOCATIO	N OF RE	LEASE					
nit Letter Section Township Range Feet from 30E 1980	om the North North	/South Line	Feet from the 660	East/West Line East	County Eddy			
Letitude_	32,335560°	CONTRACTOR OF THE	-103.827584	•	1			
Dadoud Water	NATURE	OF REL		LWahana	December 40 bbls			
ype of Release Produced Water purce of Release Tank Overflow		Date and I	Release 81 bbls four of Occurrent time unknown	ce Date and	Recovered 40 bbls Hour of Discovery 15 11:15 am			
as Immediate Notice Given?	Not Required	If YES, To	Whom?	erson (NMOCD),				
y Whom? Amy Ruth		Date and I	lour 12/14/201	5 4:52 pm				
as a Watercourse Reached?				the Watercourse.				
a Watercourse was Impacted, Describe Fully.*	-							
/A								
oupling on water transfer pump failed and pump shut do as repaired. escribe Area Affected and Cleanup Action Taken.* to leak affected 1550 ft ² of well pad within the tank cor								
nereby certify that the information given above is true a gulations all operators are required to report and/or file ablic health or the environment. The acceptance of a Could their operations have failed to adequately investig the environment. In addition, NMOCD acceptance of deral, state, or local laws and/orregulations.	certain release -141 report by to ate and remedia	notifications a he NMOCD or the contaminat	nd perform corre arked as "Final Fion that pose a the	ctive actions for re teport" does not re rest to ground water	leases which may endanger lieve the operator of liability er, surface water, human health			
gnature: New Yard		Annual L		SERVATION	DIVISION			
inted Name: Amy C Ruth		Approved by	Environmental 5	opeciansi: //h	you			
itle: Remediation-Specialist		Approval Da	te: 12 23	Expiration	Date: NA			
mail Address: ACRuth@basspet.com). Rules & Gu				
ate: 12/22/2015 Phone: 432-66		Remediat	ion per O.C.	N PROPOSAL	INO IDANIMONEG			

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources Department

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Form C-141 Revised August 24, 2018 Submit to appropriate OCD District office

Incident ID	New York Street
District RP	2RP-3464
Facility ID	BE THE WAR STORY
Application ID	CELEBRATE WAY

Release Notification

Responsible Party

	Responsible Party: XTO Energy, Inc			OGRID: 5380	
Contact Name: Kyle Littrell				Contact Telephone: (432)-221-7331	
Contact email: Kyle_Littrell@xtoenergy.com			m	Incident #: 2RP-3464	
Contact mail NM 88220	ing address	522 W. Mermod, S	uite 704 Carlsbad.		
			Location	of Release S	Source
atitude 32.3	35560		Mary View	Longitude	-103.827584
			(NAD 83 in deci	imal degrees to 5 dec	cimal places)
Site Name Ja	mes Ranch	Unit #10 Battery	1 1 1 1 2 1	Site Type	Exploration and Production
Date Release	Discovered	12/14/15		API# (if a	pplicable) 30-015-23075
II-ia I -44	Cartia	TL'a	D		
Unit Letter H	Section	Township 23S	Range 30E		unty day
			Nature and	Volume of	Release
			that apply and attach o	11-4	fic justification for the volumes provided below)
Crude Oil		Volume Released	that apply and attach of (bbls)	11-4	Volume Recovered (bbls)
			that apply and attach of (bbls)	11-4	fic justification for the volumes provided below)
		Volume Released Volume Released Is the concentration	that apply and attach of (bbls) I (bbls) 81 on of dissolved ch	calculations or specif	Volume Recovered (bbls)
	Water	Volume Released	that apply and attach of (bbls) I (bbls) 81 on of dissolved ch 10,000 mg/l?	calculations or specif	Volume Recovered (bbls) Volume Recovered (bbls)
☐ Produced	Water	Volume Released Volume Released Is the concentration produced water >	that apply and attach of (bbls) I (bbls) 81 on of dissolved ch. 10,000 mg/l? I (bbls)	calculations or specif	Volume Recovered (bbls) Volume Recovered (bbls) Volume Recovered (bbls) 40 Yes No
☑ Produced☑ Condensa	Water	Volume Released Volume Released Is the concentrati produced water > Volume Released Volume Released	that apply and attach of (bbls) I (bbls) 81 on of dissolved ch. 10,000 mg/l? I (bbls)	alculations or specif	Volume Recovered (bbls) Volume Recovered (bbls) Volume Recovered (bbls) 40 Yes No Volume Recovered (bbls)

Form C-141 Page 2

State of New Mexico Oil Conservation Division

Incident ID	
District RP	2RP-3464
Facility ID	Burney and the
Application ID	

release as defined by 19.15.29.7(A) NMAC?		
	The release was greater than 25 bbls.	
Yes No		
		To whom? When and by what means (phone, email, etc)? Etc./ Heather Patterson (NMOCD), and Jim Amos (BLM) on 12/14/15.
	Initia	l Response
The responsible	party must undertake the following actions imme	ediately unless they could create a safety hazard that would result in injury
☐ The source of the rele	ease has been stopped.	
■ The impacted area has	s been secured to protect human health	and the environment.
Released materials h	ave been contained via the use of berm	s or dikes, absorbent pads, or other containment devices.
All free liquids and r	ecoverable materials have been remove	ed and managed appropriately.
has begun, please attach	a narrative of actions to date. If reme	ence remediation immediately after discovery of a release. If remediation edial efforts have been successfully completed or if the release occurred AC), please attach all information needed for closure evaluation.
has begun, please attach within a lined containment. I hereby certify that the inforcegulations all operators are public health or the environ- failed to adequately investig	a narrative of actions to date. If rement area (see 19.15.29.11(A)(5)(a) NMA remation given above is true and complete to required to report and/or file certain releasement. The acceptance of a C-141 report by the pate and remediate contamination that pose	ence remediation immediately after discovery of a release. If remediation edial efforts have been successfully completed or if the release occurred AC), please attach all information needed for closure evaluation. To the best of my knowledge and understand that pursuant to OCD rules and the notifications and perform corrective actions for releases which may endanger the OCD does not relieve the operator of liability should their operations have a threat to groundwater, surface water, human health or the environment. In tor of responsibility for compliance with any other federal, state, or local laws
has begun, please attach within a lined containment of the property of the pro	a narrative of actions to date. If rement area (see 19.15.29.11(A)(5)(a) NMA remation given above is true and complete to required to report and/or file certain releasement. The acceptance of a C-141 report by the pate and remediate contamination that pose	edial efforts have been successfully completed or if the release occurred AC), please attach all information needed for closure evaluation. To the best of my knowledge and understand that pursuant to OCD rules and the notifications and perform corrective actions for releases which may endanger the OCD does not relieve the operator of liability should their operations have a threat to groundwater, surface water, human health or the environment. In
has begun, please attach within a lined containment of the property of the pro	a narrative of actions to date. If rement area (see 19.15.29.11(A)(5)(a) NMA remation given above is true and complete to required to report and/or file certain releasement. The acceptance of a C-141 report by the pate and remediate contamination that pose of a C-141 report does not relieve the operation.	edial efforts have been successfully completed or if the release occurred AC), please attach all information needed for closure evaluation. To the best of my knowledge and understand that pursuant to OCD rules and the notifications and perform corrective actions for releases which may endanger to the OCD does not relieve the operator of liability should their operations have a threat to groundwater, surface water, human health or the environment. In tor of responsibility for compliance with any other federal, state, or local laws
has begun, please attach within a lined containment within a lined containment. I hereby certify that the inforcegulations all operators are public health or the environg failed to adequately investig addition, OCD acceptance of and/or regulations. Printed Name: Kyf	a narrative of actions to date. If rement area (see 19.15.29.11(A)(5)(a) NMA remains given above is true and complete to required to report and/or file certain releasment. The acceptance of a C-141 report by the and remediate contamination that pose if a C-141 report does not relieve the operate Littreff	edial efforts have been successfully completed or if the release occurred AC), please attach all information needed for closure evaluation. To the best of my knowledge and understand that pursuant to OCD rules and the notifications and perform corrective actions for releases which may endanger the OCD does not relieve the operator of liability should their operations have a threat to groundwater, surface water, human health or the environment. In the tor of responsibility for compliance with any other federal, state, or local laws Title: SH&E Coordinator
has begun, please attach within a lined containment of the property of the pro	a narrative of actions to date. If rement area (see 19.15.29.11(A)(5)(a) NMA remains given above is true and complete to required to report and/or file certain releasment. The acceptance of a C-141 report by the and remediate contamination that pose if a C-141 report does not relieve the operate Littreff	edial efforts have been successfully completed or if the release occurred AC), please attach all information needed for closure evaluation. To the best of my knowledge and understand that pursuant to OCD rules and e notifications and perform corrective actions for releases which may endanger the OCD does not relieve the operator of liability should their operations have a threat to groundwater, surface water, human health or the environment. In tor of responsibility for compliance with any other federal, state, or local laws Title: SH&E Coordinator Date: 4/12/2019

	ruggazweit
ident ID	
strict RP	2RP-3464

Inc Dis Facility ID Application ID

Site Assessment/Characterization

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?	>150 (ft bgs)		
Did this release impact groundwater or surface water?	☐ Yes ⊠ No		
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ⊠ No		
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ⊠ No		
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ⊠ No		
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ⊠ No		
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ⊠ No		
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ⊠ No		
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ⊠ No		
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ⊠ No		
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes 🛛 No		
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ⊠ No		
Did the release impact areas not on an exploration, development, production, or storage site?	☐ Yes ⊠ No		
Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.			
Characterization Report Checklist: Each of the following items must be included in the report.			
 Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells. Field data Data table of soil contaminant concentration data 			

•
Characterization Report Checklist: Each of the following items must be included in the report.
Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
☐ Field data
□ Data table of soil contaminant concentration data
Depth to water determination
Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
Boring or excavation logs
Photographs including date and GIS information
Topographic/Aerial maps
Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

Received by OCD: 8/19/2025 2:38:13 PM1 Form C-141 State of New Mexico Page 43 of 112

Oil Conservation Division Page 4

Incident ID District RP

2RP-3464

Facility ID Application ID

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.

Printed Name:Kyle Littrell	Title:SH&E Supervisor
Signature:	Date: _10/30/2019
email: Kyle_Littrell@xtoenergy.com	Telephone:(432)-221-7331
OCD Only	
Received by:	Date:

Page 44 of 112

Incident ID
District RP
Facility ID
Application ID

nAB1535754357 2RP-3464

Remediation Plan

Remediation Plan Checklist: Each of the following items must be included in the plan.

Detailed description of proposed remediation technique
Scaled sitemap with GPS coordinates showing delineation points
Estimated volume of material to be remediated
Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: Each of the following items must be confirmed as part of any request for deferral of remediation.

Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.

Extents of contamination must be fully delineated.

Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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.

Signature:		Date:10/30/2019			
email:	Kyle_Littrell@xtoenergy.com	Telephone:	(432)-221-7331_		
OCD Only					
Received by: _		Date:			
Approved	Approved with Attached Conditions of	Approval	Denied	Deferral Approved	
Signature:	Bradford Billings	Date: 07/12/202	1		

Printed Name: _____Kyle Littrell_____ Title: ___SH&E Supervisor_____

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources Department

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	NAB1904653072
District RP	2RP-5243
Facility ID	a distribution of the
Application ID	pAB1904652533

Release Notification

Responsible Party

	KTO Energy, Inc		OGRID: 5380				
Contact Name: Kyle	Littrell	energy were	Contact T	elephone: (432)-221-7331			
Contact email: Kyle	Littrell@xtoenergy.co	om	Incident #: 2RP-5243				
Contact mailing addi NM 88220	ress 522 W. Mermod, S	Suite 704 Carlsbad					
		Location	of Release S	ource			
atitude 32.335540		(NAD 83 in deci	Longitude	-103.827513 mal places)			
Site Name James Ra	nch Unit #10 Battery	viview donder	Site Type	Bulk Storage and Separation Fac	ility		
Date Release Discove	ered 01/29/19	via esmua	API# (if ap	plicable) 30-015-23075	at me all large		
Unit Letter Section	on Township	Range	Cou	ntv			
H 1	238	30E	Ed				
urface Owner: 🔲 St	ate ⊠ Federal 🗌 Tr	ibal Private (Na		Release			
M	sterial(s) Released (Select all	Nature and	Volume of	c justification for the volumes provided be	low)		
M: ☑ Crude Oil	sterial(s) Released (Select all Volume Release	Nature and that apply and attach of (bbls) 9.8	Volume of	Volume Recovered (bbls) 7	low)		
	sterial(s) Released (Select all	Nature and that apply and attach of (bbls) 9.8	Volume of	c justification for the volumes provided be	low)		
M: ☑ Crude Oil	Volume Released Volume Released Volume Released	Nature and that apply and attach of d (bbls) 9.8 d (bbls) ion of dissolved ch	Volume of	Volume Recovered (bbls) 7	low)		
M: ⊠ Crude Oil	volume Released Volume Released Volume Released	Nature and that apply and attach of d (bbls) 9.8 d (bbls) ion of dissolved ch >10,000 mg/l?	Volume of	Volume Recovered (bbls) 7 Volume Recovered (bbls)	low)		
Maximus Maxim	Volume Released Volume Released Volume Released Is the concentrate produced water	Nature and that apply and attach of d (bbls) 9.8 d (bbls) tion of dissolved che >10,000 mg/l? d (bbls)	Volume of	Volume Recovered (bbls) 7 Volume Recovered (bbls) Yes No	low)		
Maximum Maxim	Volume Released Volume Released Volume Released Is the concentrate produced water > Volume Released	Nature and that apply and attach of d (bbls) 9.8 d (bbls) tion of dissolved che >10,000 mg/l? d (bbls)	Volume of	Volume Recovered (bbls)			
Mai ☐ Crude Oil ☐ Produced Water ☐ Condensate ☐ Natural Gas	Volume Released Volume Released Volume Released Is the concentrate produced water > Volume Released	Nature and that apply and attach of d (bbls) 9.8 d (bbls) ion of dissolved ch >10,000 mg/l? d (bbls) d (Mcf)	Volume of	Volume Recovered (bbls) Volume Recovered (Mcf)			
Maximum Maxim	Volume Released Volume Released Volume Released Is the concentrate produced water > Volume Released Volume Released Volume Released Volume/Weight	Nature and that apply and attach of d (bbls) 9.8 d (bbls) tion of dissolved ch >10,000 mg/l? d (bbls) d (Mcf) Released (provide	Volume of calculations or specifical control of the calculations of the	Volume Recovered (bbls) Volume Recovered (Mcf) Volume/Weight Recovered (pr	ovide units)		
Mai Crude Oil Produced Water Condensate Natural Gas Other (describe) Cause of Release Just prior to unloading	Volume Released Volume Released Volume Released Is the concentrate produced water and volume Released Volume Released Volume Released Volume/Weight	Nature and that apply and attach of d (bbls) 9.8 d (bbls) ion of dissolved ch >10,000 mg/l? d (bbls) d (Mcf) Released (provide ers, an overload of	Volume of calculations or specifical control of the calculations of th	Volume Recovered (bbls) Volume Recovered (Mcf) Volume/Weight Recovered (precipitation of the covered (precipitatio	ovide units) o the earthen berm		
Mai Crude Oil Produced Water Condensate Natural Gas Other (describe) Cause of Release Just prior to unloading This was due to increase	Volume Released Volume Released Volume Released Is the concentrate produced water > Volume Released Volume Released Volume Released Volume/Weight g the tanks by oil hauleased production efficient	Nature and that apply and attach of d (bbls) 9.8 d (bbls) ion of dissolved ch >10,000 mg/l? d (bbls) d (Mcf) Released (provide ers, an overload of ency by the lease o	Volume of calculations or specifical conditions or specifical conditions on specifical condition	Volume Recovered (bbls) Volume Recovered (Mcf) Volume/Weight Recovered (pr	ovide units) o the earthen berm		

Form C-141 Page 2

State of New Mexico Oil Conservation Division

Incident ID	DE SEGUESA CO	Autoritan
District RP	2RP-5243	LANGE B
Facility ID	HANGE STEEL	2000
Application ID	TAX SEE SHORE	NEW CANA

Was this a major release as defined by	If YES, for what reason(s)	does the responsible party consider this a major release?
19.15.29.7(A) NMAC?		
☐ Yes ⊠ No		
If YES, was immediate n	otice given to the OCD? By	whom? To whom? When and by what means (phone, email, etc)?
		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 rel	ease has been stopped.	
The impacted area ha	as been secured to protect hur	man health and the environment.
Released materials h	ave been contained via the us	se of berms or dikes, absorbent pads, or other containment devices.
All free liquids and r	ecoverable materials have be	en removed and managed appropriately.
has begun, please attach	a narrative of actions to date	ay commence remediation immediately after discovery of a release. If remediation e. If remedial efforts have been successfully completed or if the release occurred i)(a) NMAC), please attach all information needed for closure evaluation.
regulations all operators are public health or the environ failed to adequately investig	required to report and/or file cer ment. The acceptance of a C-14 tate and remediate contamination	complete to the best of my knowledge and understand that pursuant to OCD rules and rtain release notifications and perform corrective actions for releases which may endanger I report by the OCD does not relieve the operator of liability should their operations have in that pose a threat to groundwater, surface water, human health or the environment. In the operator of responsibility for compliance with any other federal, state, or local laws
Printed Name: Kyl	Littrell	Title: SH&E Coordinator
Signature.	What	Date: 4/12/2019
email: _Kyle Littrell@xto	energy.com	Telephone:432-221-7331
OCD Only		
Received by:		Date:

		Page 47 of 112
Incident ID		
District RP	2RP-5243	
Facility ID		

Application ID

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 20 days after the release discovery date.	
What is the shallowest depth to groundwater beneath the area affected by the release?	<u>>150</u> (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ⊠ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ⊠ No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ⊠ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ⊠ No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ⊠ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ⊠ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ⊠ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ⊠ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ⊠ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes 🏿 No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ⊠ No
Did the release impact areas not on an exploration, development, production, or storage site?	☐ Yes ⊠ No
Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and ver contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.	tical extents of soil

Characterization Report Checklist: Each of the following items must be included in the report.
 Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells. Field data Data table of soil contaminant concentration data Depth to water determination Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release Boring or excavation logs Photographs including date and GIS information Topographic/Aerial maps Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

Received by OCD: 8/19/20252:38:13 PM Form C-141 State of New Mexico Page 4 Oil Conservation Division

Incident ID
District RP
Page 48 of 112

District RP
2RP-5243
Facility ID
Application ID

ate of New Mexico

Incident ID	nAB1904653072
District RP	2RP-5243
Facility ID	
Application ID	

Remediation Plan

Remediation Plan Checklist: Each of the following items must be included in the plan.
 Detailed description of proposed remediation technique Scaled sitemap with GPS coordinates showing delineation points Estimated volume of material to be remediated Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)
Deferral Requests Only: Each of the following items must be confirmed as part of any request for deferral of remediation.
Deterral Requests Only: Each of the following tiems must be confirmed as part of any request for deferral of remediation.
Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
Extents of contamination must be fully delineated.
Contamination does not cause an imminent risk to human health, the environment, or groundwater.
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.
Printed Name:Kyle Littrell Title:SH&E Supervisor
Signature: Date: <u>10/30/2019</u>
email:Kyle_Littrell@xtoenergy.com Telephone:(432)-221-7331
OCD Only
Received by: Date:
Approved
Signature: Bradford Billings Date: 07/12/2021

IT ETEN			5	08 Wes	ronment t Stevens lew Mexi)	Identifier: SVE - PTO Project Name:	Date: 9 /18/19 RP Number 2/1-7/12/1,	
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		LITHO	LOGIC			LING LO		Logged By: WM	Method: 5-9:2 Total Depth:	
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at/Long:		LITHO	LOGIC	/ SO	L SAMP		OG ORIDES, PI	D.	Logged By: UNA	Method: Sonie	
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		LITHO	LOGIC	C /SOI	L SAMP				Logged By: WM	Method: Sorie	
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SOIL VAPOR EXTRACTION PILOT TEST FIELD MEASUREMENTS XTO ENERGY REMEDIATION PROJECT JRU 10 TANK BATTERY

Site: JRU 10	Personnel:	Lynda Laumbach	Test Start Time:	9:50
	Date:	10/1/2019	Test End Time:	12:20
SVE Well DTI	P/DTW Before Test:		SVE Well DTP/DTW After:	

1		Monitoring Points				-01	/ell Name: SVE-PT	Test Extraction W		
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									n Change:	Maximu

Notes:

cfm - cubic feet per minute ppm - parts per million DTW - Depth To Water IWC - inches water column SVE - soil vapor extraction DTP - Depth to Product



SOIL VAPOR EXTRACTION PILOT TEST FIELD MEASUREMENTS XTO ENERGY REMEDIATION PROJECT JRU 10 TANK BATTERY

Site: JRU 10	Personnel: L	Lynda Laumbach	Test Start Time:	13:00
	Date:	10/1/2019	Test End Time:	15:15
SVE Well DTF	P/DTW Before Test:		SVE Well DTP/DTW After:	

		Test Extraction W	Vell Name: SVE-PT	-04				Monitoring Points		1
SVE	SVE	SVE	VOC			Time	SVE-PT-01	SVE-PT-03	SVE-PT-02	1
Vacuum	Velocity	Flowrate	Stack	Tempera	ature (°F)	(minutes)		nce From Test Well]
(IWC)	(fm)	(cfm)	(ppm)		F - F		18	33 Vacuum (IWC)	56.5	A: C 1 C 11 4 19
				wamioic	Ambient					Air Sample Collected?
Static						0		0	0	
10	2733	60	1478	79.6	84.5	15	4.5	6	2.5	
10	2765	60	1556	80.2	85.9	30	4.5	6	2.5	
20	5687	124	1380	77.5	83.6	45	9	11.5	5	
20	5683	124	1321	78.7	85	60	9	11.5	5	Yes, 14:50
35	Е	Е	1629	77.8	85.0	85	10.5	13	5.5	
35	Е	Е	1584	77.5	84.8	100	10.5	13	5.5	
Post (Static) Test						120	0	0	0	
	m Change:									

Notes:

cfm - cubic feet per minute

IWC - inches water column

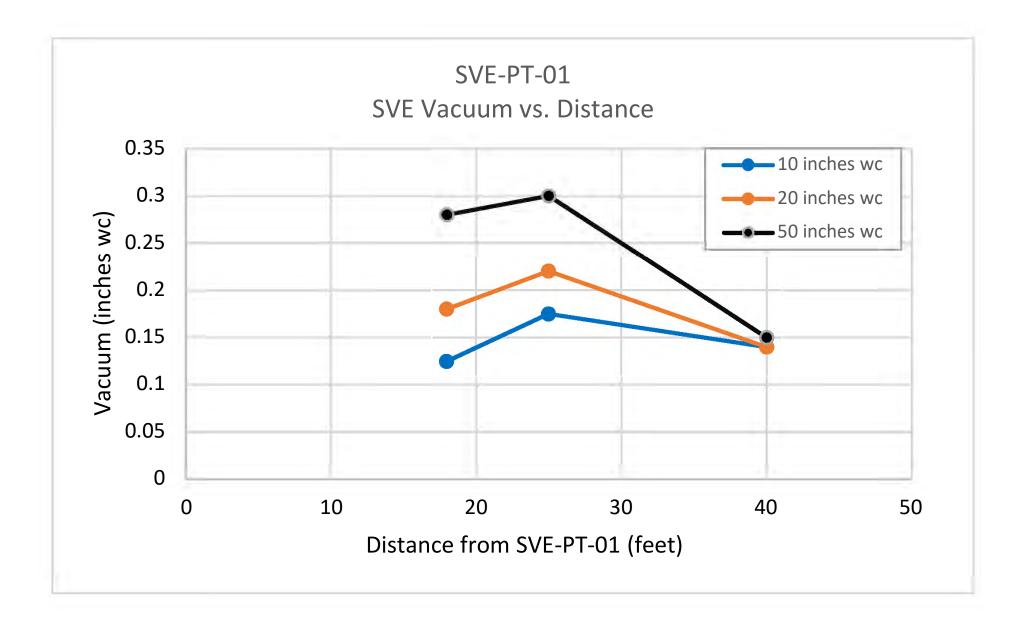
ppm - parts per million

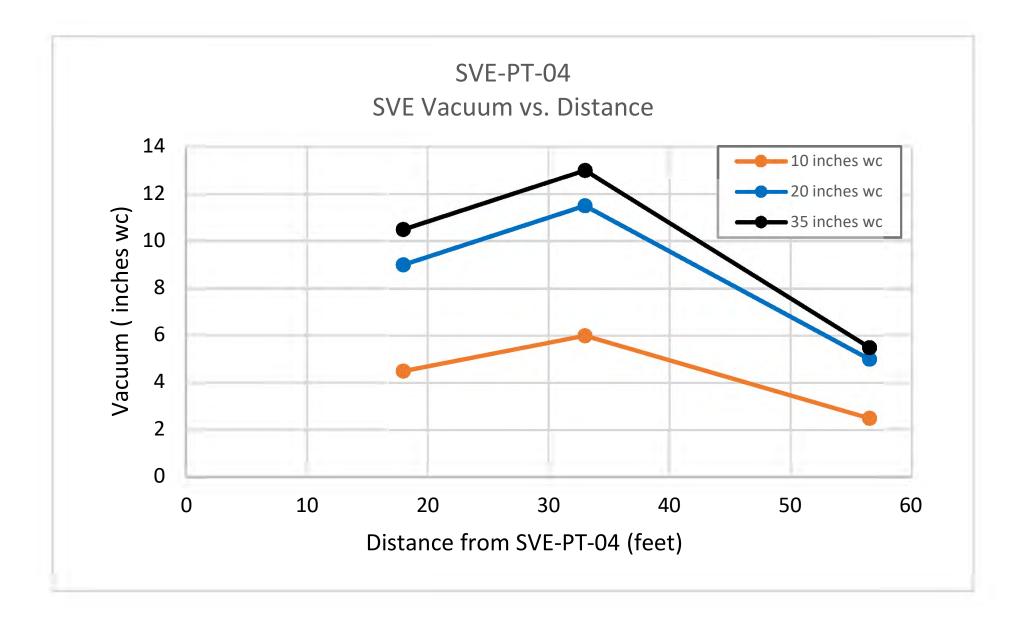
DTW - Depth To Water

SVE - soil vapor extraction DTP - Depth to Product

E - Exceeds anenomenter range: 15,000 fm







Analytical Report 638711

for

LT Environmental, Inc.

Project Manager: Dan Moir JRU 10 Tank Battery 012918003 07-OCT-19

Collected By: Client



1089 N Canal Street Carlsbad, NM 88220

Xenco-Houston (EPA Lab Code: TX00122): Texas (T104704215-19-30), Arizona (AZ0765), Florida (E871002-24), Louisiana (03054) Oklahoma (2017-142), North Carolina (681)

> Xenco-Dallas (EPA Lab Code: TX01468): Texas (TX104704295-19-22), Arizona (AZ0809), Arkansas (17-063-0)

Xenco-El Paso (EPA Lab Code: TX00127): Texas (T104704221-19-16) Xenco-Lubbock (EPA Lab Code: TX00139): Texas (T104704219-19-21) Xenco-Midland (EPA Lab Code: TX00158): Texas (T104704400-19-19) Xenco-San Antonio (EPA Lab Code: TNI02385): Texas (T104704534-19-5) Xenco Phoenix (EPA Lab Code: AZ00901): Arizona (AZ0757) Xenco-Tampa: Florida (E87429), North Carolina (483)



07-OCT-19

Project Manager: **Dan Moir LT Environmental, Inc.**4600 W. 60th Avenue
Arvada, CO 80003

Reference: XENCO Report No(s): 638711

JRU 10 Tank Battery

Project Address: Rural Eddy County

Dan Moir:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number(s) 638711. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. The uncertainty of measurement associated with the results of analysis reported is available upon request. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 638711 will be filed for 45 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

Jessica Kramer

Jessica Kramer

Project Assistant

Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.

Certified and approved by numerous States and Agencies.

A Small Business and Minority Status Company that delivers SERVICE and QUALITY

Houston - Dallas - Midland - San Antonio - Phoenix - Oklahoma - Latin America



Sample Cross Reference 638711

LT Environmental, Inc., Arvada, CO

JRU 10 Tank Battery

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
SVE-PT-04	A	10-01-19 14:50		638711-001

CASE NARRATIVE

Client Name: LT Environmental, Inc. Project Name: JRU 10 Tank Battery

 Project ID:
 012918003
 Report Date:
 07-OCT-19

 Work Order Number(s):
 638711
 Date Received:
 10/02/2019

Sample receipt non conformances and comments:

None

Sample receipt non conformances and comments per sample:

None

Certificate of Analysis Summary 638711

LT Environmental, Inc., Arvada, CO Project Name: JRU 10 Tank Battery

Project Id: 012918003 Contact: Dan Moir

Project Location:

Rural Eddy County

Date Received in Lab: Wed Oct-02-19 08:35 am

Report Date: 07-OCT-19 **Project Manager:** Jessica Kramer

	Lab Id:	638711-0	01		1	
Analysis Requested	Field Id:	SVE-PT-0	04			
mutysis Requesicu	Depth:					
	Matrix:	AIR				
	Sampled:	Oct-01-19 1	4:50			
BTEX by EPA 8021B	Extracted:	Oct-04-19 1	1:00			
SUB: T104704295-19-22	Analyzed:	Oct-04-19 1	4:00			
	Units/RL:	ppmv	RL			
Benzene		22.6 +	3.13			
Toluene		98.3 +	2.65			
Ethylbenzene		4.79 +	2.30			
m,p-Xylenes		98.2 +	4.61			
o-Xylene		15.6 +	2.30			
Total Xylenes		114 +	2.30			
Total BTEX		239 +	2.30			
TPH GRO by EPA 8015 Mod.	Extracted:	Oct-04-19 1	1:00			
SUB: T104704295-19-22	Analyzed:	Oct-04-19 1	4:00			
	Units/RL:	ppmv	RL			
TPH-GRO	1	5170 +	128			

This analytical report, and the entire data package it represents, has been made for your exclusive and confidential use. The interpretations and results expressed throughout this analytical report represent the best judgment of XENCO Laboratories. XENCO Laboratories assumes no responsibility and makes no warranty to the end use of the data hereby presented. Our liability is limited to the amount invoiced for this work order unless otherwise agreed to in writing.

Houston - Dallas - Midland - Tampa - Phoenix - Lubbock - San Antonio - El Paso - Atlanta - New Mexico

Jessica Kramer Project Assistant



Certificate of Analytical Results 638711

LT Environmental, Inc., Arvada, CO

JRU 10 Tank Battery

SVE-PT-04 Sample Id:

Matrix:

Air

Date Received:10.02.19 08.35

Lab Sample Id: 638711-001

Date Collected:

Date Prep:

10.01.19 14.50

Analytical Method:

BTEX by EPA 8021B

Prep Method: % Moisture:

SW5030B

Tech:

AKC

AKC

10.04.19 11.00

Analyst:

Seq Number:

3103365

SUB: T104704295-19-22

Parameter	Cas Number	Result mg/m3	RL mg/m3	Result ppmv	RL ppmv	Analysis Date	Flag	Dil
Benzene	71-43-2	72.2	10.0	22.6	3.13	10.04.19 14.00	+	10
Toluene	108-88-3	370	9.98	98.3	2.65	10.04.19 14.00	+	10
Ethylbenzene	100-41-4	20.8	9.98	4.79	2.30	10.04.19 14.00	+	10
m,p-Xylenes	179601-23-1	426	20.0	98.2	4.61	10.04.19 14.00	+	10
o-Xylene	95-47-6	67.7	9.98	15.6	2.30	10.04.19 14.00	+	10
Total Xylenes	1330-20-7	494	9.98	114	2.30	10.04.19 14.00	+	10
Total BTEX		957	9.98	239	2.30	10.04.19 14.00	+	10
S				%	T T - *4	The term of the te		

Surrogate Units Limits **Analysis Date** Flag Recovery 4-Bromofluorobenzene 95 % 70-135 10.04.19 14.00

Analytical Method:

TPH GRO by EPA 8015 Mod.

Prep Method: % Moisture:

SW5030B

Tech:

AKC

Analyst:

AKC

Date Prep:

10.04.19 11.00

Seq Number:

3103363

SUB: T104704295-19-22

Parameter	Cas Number	Result mg/m3	RL mg/m3	Result ppmv	RL ppmv		Analysis Date Fla		Flag	lag Dil	
TPH-GRO	8006-61-9	20200	501	5170	128		10.04.19	14.00	+	10	
				%							
Surrogate				Recovery	Units	Limits	Analysis Date	Flag			
4-Bromofluorobenzene				95	%	60-140	10.04.19 14.00				



Flagging Criteria

- X In our quality control review of the data a QC deficiency was observed and flagged as noted. MS/MSD recoveries were found to be outside of the laboratory control limits due to possible matrix /chemical interference, or a concentration of target analyte high enough to affect the recovery of the spike concentration. This condition could also affect the relative percent difference in the MS/MSD.
- **B** A target analyte or common laboratory contaminant was identified in the method blank. Its presence indicates possible field or laboratory contamination.
- **D** The sample(s) were diluted due to targets detected over the highest point of the calibration curve, or due to matrix interference. Dilution factors are included in the final results. The result is from a diluted sample.
- E The data exceeds the upper calibration limit; therefore, the concentration is reported as estimated.
- F RPD exceeded lab control limits.
- J The target analyte was positively identified below the quantitation limit and above the detection limit.
- U Analyte was not detected.
- L The LCS data for this analytical batch was reported below the laboratory control limits for this analyte. The department supervisor and QA Director reviewed data. The samples were either reanalyzed or flagged as estimated concentrations.
- **H** The LCS data for this analytical batch was reported above the laboratory control limits. Supporting QC Data were reviewed by the Department Supervisor and QA Director. Data were determined to be valid for reporting.
- **K** Sample analyzed outside of recommended hold time.
- **JN** A combination of the "N" and the "J" qualifier. The analysis indicates that the analyte is "tentatively identified" and the associated numerical value may not be consistent with the amount actually present in the environmental sample.

BRL Below Reporting Limit.

RL Reporting Limit

MDL Method Detection Limit SDL Sample Detection Limit LOD Limit of Detection

PQL Practical Quantitation Limit MQL Method Quantitation Limit LOQ Limit of Quantitation

DL Method Detection Limit

NC Non-Calculable

SMP Client Sample BLK Method Blank

BKS/LCS Blank Spike/Laboratory Control Sample BKSD/LCSD Blank Spike Duplicate/Laboratory Control Sample Duplicate

MD/SD Method Duplicate/Sample Duplicate MS Matrix Spike MSD: Matrix Spike Duplicate

- + NELAC certification not offered for this compound.
- * (Next to analyte name or method description) = Outside XENCO's scope of NELAC accreditation

^{**} Surrogate recovered outside laboratory control limit.



QC Summary 638711

LT Environmental, Inc.

JRU 10 Tank Battery

Analytical Method: BTEX by EPA 8021B SW5030B Prep Method: Seq Number: 3103365 Matrix: Air Date Prep: 10.04.19

LCS Sample Id: 7687502-1-BKS MB Sample Id: 7687502-1-BLK

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec		Limits		Units	Analysis Date	Flag
Benzene	< 0.313	31.3	29.2	93		70-125		ppmv	10.04.19 11:57	
Toluene	< 0.133	26.5	22.8	86		70-125		ppmv	10.04.19 11:57	
Ethylbenzene	< 0.115	23.0	19.7	86		70-125		ppmv	10.04.19 11:57	
m,p-Xylenes	< 0.230	46.1	40.4	88		70-125		ppmv	10.04.19 11:57	
o-Xylene	< 0.115	23.0	19.2	83		70-125		ppmv	10.04.19 11:57	
Surrogate	MB %Rec	MB Flag		CS Rec	LCS Flag		Limits	Units	Analysis Date	
4-Bromofluorobenzene	100		1	04			70-135	%	10.04.19 11:57	

Analytical Method: BTEX by EPA 8021B

Prep Method: SW5030B Seq Number: 3103365 Matrix: Air Date Prep: 10.04.19

MD Sample Id: 638711-001 D Parent Sample Id: 638711-001

Parameter	Parent Result	MD Result	%RPD	RPD Limit	Units	Analysis Date	Flag
Benzene	22.6	27.2	18	35	ppmv	10.04.19 14:13	
Toluene	98.3	117	17	35	ppmv	10.04.19 14:13	
Ethylbenzene	4.79	5.37	11	35	ppmv	10.04.19 14:13	
m,p-Xylenes	98.2	119	19	35	ppmv	10.04.19 14:13	
o-Xylene	15.6	19.5	22	35	ppmv	10.04.19 14:13	
Total Xylenes	114	139	NC	35	ppmv	10.04.19 14:13	
Total BTEX	239	288	NC	35	ppmv	10.04.19 14:13	

Analytical Method: TPH GRO by EPA 8015 Mod. SW5030B Prep Method: Seq Number: 3103363 Date Prep: 10.04.19 Matrix: Air

LCS Sample Id: 7687498-1-BKS MB Sample Id: 7687498-1-BLK

100

MBLCS LCS Limits Units Spike Analysis Flag **Parameter** Result Amount Result %Rec Date TPH-GRO 179 168 65-115 10.04.19 11:57 < 6.39 ppmv LCS MB LCS Limits MB Units Analysis **Surrogate** %Rec Flag %Rec Flag Date

Analytical Method: TPH GRO by EPA 8015 Mod. SW5030B Prep Method: 3103363 10.04.19

Matrix: Air

104

Parent Sample Id: 638711-001 MD Sample Id: 638711-001 D

MD %RPD RPD Limit Units **Parent** Analysis Flag **Parameter** Result Result Date TPH-GRO 5170 5570 10.04.19 14:13 7 35

ppmv MS/MSD Percent Recovery [D] = 100*(C-A) / BLCS = Laboratory Control Sample

Relative Percent Difference RPD = 200* | (C-E) / (C+E) |A = Parent Result LCS/LCSD Recovery [D] = 100 * (C) / [B]Log Difference Log Diff. = Log(Sample Duplicate) - Log(Original Sample)

= MS/LCS Result E = MSD/LCSD Result MS = Matrix SpikeB = Spike Added D = MSD/LCSD % Rec

10.04.19 11:57

4-Bromofluorobenzene

Seq Number:

60-140

Date Prep:

%



AIR SAMPLING CHAIN OF CUSTODY

(2387() Xenco Job#: -(2387(0

Stafford, Texas (281-240-4200)

San Antonio, Texas (210-509-3334)

Phoenix, Arizona (480-355-0900)

Dallas, Texas (214-902-0300)

Lubbock, TX (806-794-1296)

Midland, TX (432-704-5251)

El Paso, TX (915-585-3443)

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		Contact: Kyle L		nail: klittrell@xtd	penergy.com	TYPE			0	P							
	ct Contact: Dan Moir	Company: LT E				Vapor			fie	fie					1		
Email:	: dmoir@ltenv.com		Ph.No.: (43	2) 238-4292		- Sa		0	ein	e in	a q			-			
rojec	t Name & No.: JRU 10 Tank I	Battery , 012918	003			Soil		=	Sur	sur	iste) L						
Site L	ocation: Rural Eddy County,	NM				SV = Soi Ambient		late	res	res	Canister "Hg) Lab						
.O. N	o.: Task#002					. 11	100	nge	tart	r P top	ng (×	Hd			11	
Sampl	er(s): Lynda Laumbach					= Indoor	iste	Flow Regulator ID	iste 3) S	iste 3) S	ssu	BTEX	7			9-6	
ab#	Field ID/Point of Collection	Start Date	Start Time	Stop Date	Stop Time	<u> </u>	Canister ID	Flo	Canister Pressure in field ("Hg) Start	Canister Pressure in field ("Hg) Stop	Incoming Canister Pressure ("Hg) Lab	8	1			Remar	ks
1	SVE-PT-64	10/01/2019	14:40	10/01/219	14:50	SV			/	/	/	X	X				
-		10/01/0-11		1.57007 0.11	11.0							-	,				
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0.34 7-16																	
Relin	nquished By:	Date/Time/		(1) Received By:	0			Re	quest	ad TA	T			Shir	pping l	nformation	
7	Masalh	10/2/2019	08:35	Call	YOU		X Contra		3 D	ay	Sa	me Da	ay	FedEx	Othe	er:	
Relin	quished By:	Date/Time		(2) Received By:	9		7 Day 5 Day		2 D		Need By	y:	-	UPS	Trackin	ng No.:	
Relin	quished By:	Date/Time		(3) Received By:			Special Req	uests/Inst		-	-	-		1200	-		h.
elin	quished By:	Date/Time		(4) Received By:													

Inter-Office Shipment

Page 1 of 1

IOS Number 49169

Date/Time: 10/02/19 11:52

Please send report to: Jessica Kramer Created by: Elizabeth Mcclellan

Lab# From: Carlsbad

Delivery Priority:

Address: 1089 N Canal Street

Lab# To: Dallas

Air Bill No.:

E-Mail: jessica.kramer@xenco.com

Sample Id	Matrix Client Sample Id	Sample Collection	Method	Method Name	Lab Due	HT Due	PM	Analytes	Sign
638711-001	A SVE-PT-04	10/01/19 14:50	SW8015GRO	TPH GRO by EPA 8015 Mod.	10/08/19	10/04/19 14:50	JKR	PHCG	
638711-001	A SVE-PT-04	10/01/19 14:50	SW8021B	BTEX by EPA 8021B	10/08/19	10/15/19	JKR	BR4FBZ BZ BZME EBZ X	

Inter Office Shipment or Sample Comments:

Relinquished By:

Elizabeth McClellan

Date Relinquished: 10/02/2019

Received By:

Whitney Capps

Date Received: 10/03/2019 09:23

Cooler Temperature: 22.8

Received by OCD: 8/19/20252:38:13 PMI

XENCO Laboratories

Inter Office Report- Sample Receipt Checklist

Sent To: Dallas **IOS #:** 49169

Acceptable Temperature Range: 0 - 6 degC Air and Metal samples Acceptable Range: Ambient Temperature Measuring device used: XDA

Sent By:Elizabeth McClellanDate Sent:10/02/2019 11:52 AMReceived By:Whitney CappsDate Received:10/03/2019 09:23 AM

Received By: Whitney Capps	Date Received: 10/03/2019 09	:23 AM	
	Sample Receipt Checklis	st	Comments
#1 *Temperature of cooler(s)?		22.8	
#2 *Shipping container in good conditi	on?	Yes	
#3 *Samples received with appropriate	e temperature?	Yes	
#4 *Custody Seals intact on shipping of	container/ cooler?	No	
#5 *Custody Seals Signed and dated f	or Containers/coolers	N/A	
#6 *IOS present?		Yes	
#7 Any missing/extra samples?		No	
#8 IOS agrees with sample label(s)/ma	atrix?	Yes	
#9 Sample matrix/ properties agree wi	th IOS?	Yes	
#10 Samples in proper container/ bottl	e?	Yes	
#11 Samples properly preserved?		Yes	
#12 Sample container(s) intact?		Yes	
#13 Sufficient sample amount for indic	eated test(s)?	Yes	
#14 All samples received within hold to	me?	Yes	
* Must be completed for after-hours d	elivery of samples prior to placi	ng in the refrigerator	
NonConformance:			
Corrective Action Taken:			
	Nonconformance Docume	entation	
Contact:	Contacted by :	Date:	
Checklist reviewed by:			
	Whitney Capps	Date: 10/03/2019	



XENCO Laboratories Prelogin/Nonconformance Report- Sample Log-In



Client: LT Environmental, Inc.

Date/ Time Received: 10/02/2019 08:35:00 AM

Acceptable Temperature Range: 0 - 6 degC Air and Metal samples Acceptable Range: Ambient

Work Order #: 638711 Temperature Measuring device used : T-NM-007

	Sample Receipt Checklist		Comments
#1 *Temperature of cooler(s)?		20	
#2 *Shipping container in good condition?		Yes	
#3 *Samples received on ice?		Yes	
#4 *Custody Seals intact on shipping conta	iner/ cooler?	Yes	
#5 Custody Seals intact on sample bottles?		Yes	
#6*Custody Seals Signed and dated?		Yes	
#7 *Chain of Custody present?		Yes	
#8 Any missing/extra samples?		No	
#9 Chain of Custody signed when relinquis	hed/ received?	Yes	
#10 Chain of Custody agrees with sample I	abels/matrix?	Yes	
#11 Container label(s) legible and intact?		Yes	
#12 Samples in proper container/ bottle?		Yes	
#13 Samples properly preserved?		Yes	
#14 Sample container(s) intact?		Yes	
#15 Sufficient sample amount for indicated	test(s)?	Yes	
#16 All samples received within hold time?		Yes	
#17 Subcontract of sample(s)?		Yes	Subbed to Dallas
#18 Water VOC samples have zero headsp	pace?	N/A	

Must be	completed for after-hours de	elivery of samples prior to placi	ng in the refrigerator	
Analyst:		PH Device/Lot#:		
	Checklist completed by:	Elizabeth McClellan	Date: 10/02/2019	
	Checklist reviewed by:	Jessica Warner Jessica Kramer	Date: 10/04/2019	

District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720

District II 811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

District III 1000 Rio Brazos Rd., Aztec, NM 87410

Phone:(505) 334-6178 Fax:(505) 334-6170 1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. **Santa Fe, NM 87505**

CONDITIONS

Action 2175

CONDITIONS

Operator:	OGRID:
XTO ENERGY, INC	5380
6401 Holiday Hill Road	Action Number:
Midland, TX 79707	2175
	Action Type:
	[C-141] Release Corrective Action (C-141)

CONDITIONS

Created	Condition	Condition
Ву		Date
bbillings	SVE approach is approved. In future, each individual incident number must be attached to separate report on portal, although the report can be identical to the other associated	7/12/2021
	incidents at this location	



APPENDIX B

Second Quarter 2025 – Solar SVE System Update dated July 15, 2025



July 15, 2025

New Mexico Oil Conservation Division

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

Re: Second Quarter 2025 – Solar SVE System Update

James Ranch Unit #10 Battery
Eddy County, New Mexico
XTO Energy, Inc.
NMOCD Incident Numbers NAB1535754357, NAB1521257588, and NAB1904653072

To Whom it May Concern:

Ensolum, LLC (Ensolum), on behalf of XTO Energy, Inc. (XTO), presents this *Second Quarter 2025 - Solar SVE System Update* report summarizing the solar soil vapor extraction (SVE) system performance at the James Ranch Unit #10 Battery (Site), located in Unit H, Section 1, Township 23 South, Range 30 East in Eddy County, New Mexico (Figure 1). The SVE system has operated since May 27, 2022, to remediate residual subsurface soil impacts at the Site. This report summarizes Site activities performed in April, May, and June of 2025 for the New Mexico Oil Conservation Division (NMOCD).

SVE SYSTEM SPECIFICATIONS

A VariSun Direct Solar SVE system is installed at the Site and consists of a 6.2 horsepower (HP) Pentair SST65 high efficiency regenerative blower capable of producing 250 cubic feet per minute (cfm) flow and a vacuum of 110 inches of water column (IWC). The system is powered by 12, 415-watt solar modules capable of producing 5 kilowatts (KW) of electricity. A motor controller automatically starts the system as soon as sunlight is available and increases the electrical output to the blower as solar power increases throughout the day.

Ten SVE wells (SVE01 through SVE06 and SVE-PT-01 through SVE-PT-04) are currently installed at the Site, as depicted on Figure 2. In order to target total petroleum hydrocarbons (TPH) and benzene, toluene, ethylbenzene, and total xylenes (BTEX) soil impacts at different depth intervals, the screened intervals of the SVE wells were installed in shallow, medium, and deep zones. Specifically, SVE wells SVE01, SVE02, SVE03, and SVE04 target shallow zone impacts and are screened at depths between 5 feet and 20 feet below ground surface (bgs). SVE wells SVE-PT-02, SVE-PT-03, and SVE-PT-04 target medium zone impacts and are screened between 15 feet and 30 feet bgs. SVE wells SVE05, SVE06, and SVE-PT-01 target deep zone impacts and are screened at depths between 25 feet and 65 feet bgs.

Page 2

SUMMARY OF SVE OPERATIONS

During the second quarter of 2025, Ensolum personnel performed routine operation and maintenance (O&M) visits to verify that the system was operating as designed and to perform any required maintenance. In accordance with the approved *Revised Remediation Work Plan – SVE System* prepared by LT Environmental, Inc. (LTE, dated October 30, 2019), O&M inspections were performed monthly this time period. Field notes taken during O&M visits are included as Appendix A.

On June 16, 2025, an O&M technician was driving by the Site and observed the SVE system disconnected from the anchors and flipped upside down, landing on the faces of the solar panels, likely due to recent high wind events. Upon further inspection, it was determined the existing system would no longer be operational without significant repairs and/or modifications to prevent similar incidents from occurring in the future. The SVE system was removed from the Site for storage at a nearby XTO yard. Photographs of the SVE system post-wind event are provided as Appendix B.

During April 2025, vapor extraction was applied to all SVE wells except for SVE03 and SVE06 (as recommended in the *Second Quarter 2023 - Solar SVE System Update*) to remove hydrocarbon impacts from the impacted zones at the Site. In May 2025, extraction well SVE02 was taken offline due to low photoionization detector (PID) readings at that location during recent O&M events.

Between March 12 and June 13, 2025, approximately 1,141 total hours of nominal daylight were available for the solar SVE system to operate. Available nominal daylight hours are based on estimates by the National Oceanic and Atmospheric Administration's (NOAA's) National Weather Service (NWS) for the Site location. Between these dates, the recorded runtime for the system based on the hour meter reading was 1,125.4 hours, equating to a runtime efficiency of 98.6 percent (%). All downtime was the result of system damage following the June storm event. Table 1 presents the SVE system runtime compared to nominal available daylight hours per month.

VAPOR SAMPLING RESULTS

A second quarter 2025 vapor sample was collected on June 13, 2025. The vapor sample was collected from a sample port located between the SVE piping manifold and the SVE blower using a high vacuum air sampler. Prior to collection, the vapor sample was field screened with a PID for organic vapor monitoring (OVM). The vapor sample was collected directly into two 1-Liter Tedlar® bags and submitted to Eurofins Laboratories (Eurofins) in Carlsbad, New Mexico for analysis of total volatile petroleum hydrocarbons (TVPH – also known as TPH – gasoline range organics (GRO)) and BTEX following Environmental Protection Agency (EPA) Method 8260C.

TVPH concentrations account for the majority contaminant mass and system emissions, with a result of 718 micrograms per liter (μ g/L). In comparison, individual BTEX constituent concentrations ranged from below the laboratory reporting limits up to 38.8 μ g/L in the second quarter of 2025. Table 2 presents a summary of TVPH and BTEX analytical data collected during the sampling events, with the full laboratory analytical reports included in Appendix B.

Vapor sample data and measured stack flow rates are used to estimate total mass recovered and total emissions generated by the SVE system (Table 2). Based on these estimates, approximately 19,600 pounds (9.80 tons) of TVPH have been removed by the system to date.



Page 3

SYSTEM ADJUSTMENTS AND RECOMMENDATIONS

Due to the recent wind event in June 2025 that damaged the solar-powered SVE system beyond immediate repair, XTO is considering potential actions to be taken at the Site including, but not limited to, conducting confirmation soil sampling to assess the efficacy of the system and for potential Site closure, reinstallation of a solar-powered SVE system with additional anchoring systems to prevent future damage, or an assessment of alternative techniques to remediate remaining Site impacts. XTO will update the NMOCD in the third quarter 2025 report of any actions taken between July and September 2025. Additionally, an *Updated Remediation Work Plan* will be submitted to the NMOCD for review and approval if an alternate remedial technology is proposed for the Site.

We appreciate the opportunity to provide this report to the NMOCD. If you should have any questions or comments regarding this report, please contact the undersigned.

Sincerely, **Ensolum**, **LLC**

Stuart Hyde, PG (Licensed in WY, TX & WA) Senior Managing Geologist (970) 903-1607

shyde@ensolum.com

Daniel R. Moir, PG (Licensed in WY & TX)
Senior Managing Geologist
(303) 887-2946
dmoir@ensolum.com

Attachments:

Figure 1 Site Location Map

Figure 2 SVE System Configuration

Table 1 Soil Vapor Extraction System Runtime Calculations

Table 2 Soil Vapor Extraction System Mass Removal and Emissions

Appendix A Field Notes

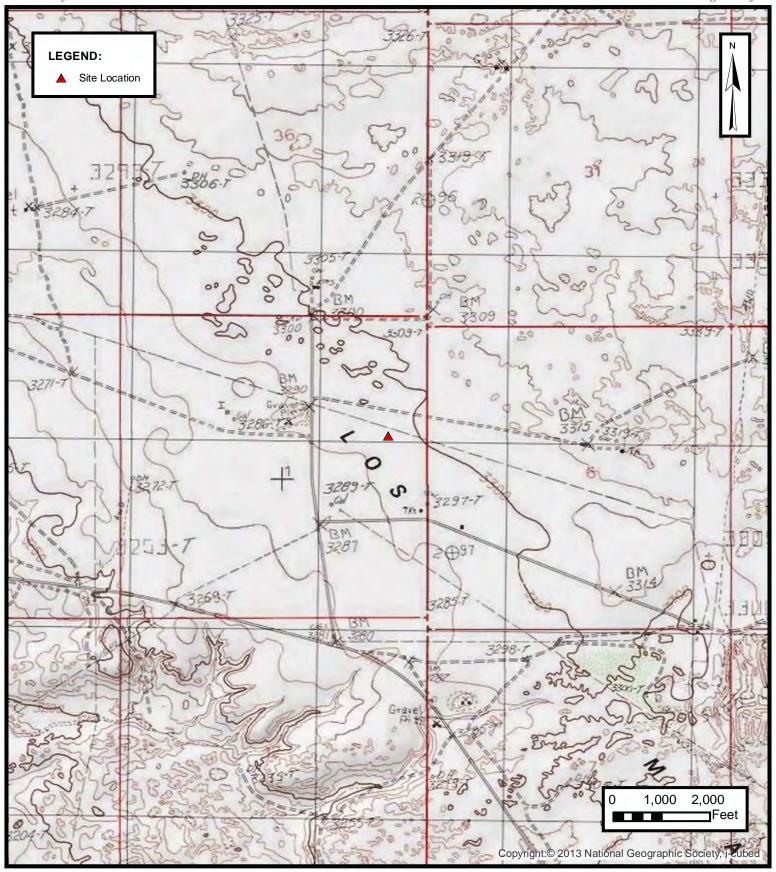
Appendix B Project Photographs

Appendix C Laboratory Analytical Reports & Chain-of-Custody Documentation





FIGURES





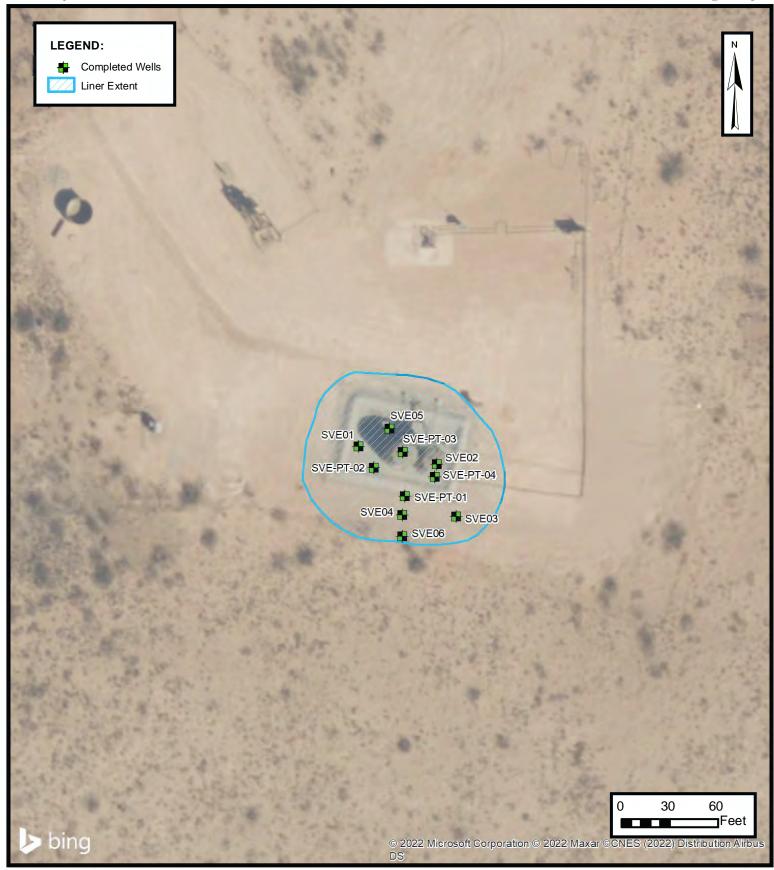
SITE LOCATION MAP

XTO ENERGY, INC
JAMES RANCH UNIT #10 BATTERY
Unit H, Sec 1, T23S, R30E
Eddy County, New Mexico

FIGURE

1

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SVE SYSTEM CONFIGURATION

XTO ENERGY, INC JAMES RANCH UNIT #10 BATTERY Unit H, Sec 1, T23S, R30E Eddy County, New Mexico **FIGURE**



TABLES



TABLE 1 SOIL VAPOR EXTRACTION SYSTEM RUNTIME CALCULATIONS

James Ranch Unit #10 Battery XTO Energy Eddy County, New Mexico

Date	Runtime Meter Hours	Delta Hours		
3/12/2025	10,110.6			
6/13/2025	11,236.0	1,125.4		

Time Period	March 12 through March 31, 2025	April 1 through April 30, 2025	May 1 through May 30, 2025	June 1 through June 13, 2025
Days	19	30	30	13
Avg. Nominal Daylight Hours	11	12	13	14
Available Runtime Hours	209	360	390	182

Quarterly Available Daylight Runtime Hours 1,141
Quarterly Runtime Hours 1,125.4

Quarterly % Runtime 98.6%

Month	Days	Nominal Daylight Hours	Total Month Hours
January	31	9	279
February	28	10	280
March	31	11	341
April	30	12	360
May	31	13	403
June	30	14	420
July	31	14	434
August	31	13	403
September	30	12	360
October	31	11	341
November	30	10	300
December	31	9	279

Ensolum 1 of 1



TABLE 2 SOIL VAPOR EXTRACTION SYSTEM MASS REMOVAL AND EMISSIONS James Ranch Unit #10 Battery XTO Energy Eddy County, New Mexico

Laborator	v Analytica	I Results

	Laboratory Arialytical Nestins									
Date	PID (ppm)	Benzene (μg/L)	Toluene (μg/L)	Ethylbenzene (μg/L)	Total Xylenes (μg/L)	TVPH (μg/L)				
5/27/2022*	679	12.6	40.5	10.0	34.6	12,500				
6/8/2022*	901	21.0	210	9.90	434	35,000				
6/20/2022*	960	21.2	199	10	225	20,200				
7/18/2022*	535	17.1	138	11.1	252	14,400				
8/15/2022*	987	50.0	135	50.0	227	12,300				
9/19/2022	380	10.0	54.9	10.0	110	4,830				
12/19/2022	337	10.0	27.7	10.0	47.1	3,030				
3/15/2023	245	10.0	25.2	10.0	29.4	1,630				
6/14/2023	323	10.0	29.2	10.0	54.9	2,180				
9/20/2023	611	10.0	43.4	10.0	106	5,210				
12/14/2023	278	10.0	30.3	10.0	78.4	3,820				
3/13/2024	358	10.0	29.0	10.0	80.8	2,900				
7/2/2024	260	10.0	16.9	10.0	29.5	870				
9/12/2024	391	10.0	17.4	10.0	36.7	841				
12/11/2024	168	10.0	11.6	10.0	24.4	455				
3/12/2025	235	10.0	10.0	10.0	23.0	378				
6/13/2025	233	10.0	13.1	10.0	36.8	718				
Average	464	14.2	61	12.4	108	7,133				

Flow and Vapor Extraction Summary

Date	Flow Rate (cfm) ⁽¹⁾	Total System Flow (cf)	Delta Flow (cf)	Benzene (lb/hr)	Toluene (lb/hr)	Ethylbenzene (lb/hr)	Total Xylenes (lb/hr)	TVPH (lb/hr)
5/27/2022	140	0	-					
6/8/2022	113	1,046,154	1,046,154	0.00710	0.0529	0.00421	0.0990	10.0
6/20/2022	105	2,047,854	1,001,700	0.00829	0.0803	0.00391	0.129	10.8
7/18/2022	70	3,572,454	1,524,600	0.00501	0.0441	0.00276	0.0624	4.53
8/15/2022	98	5,656,098	2,083,644	0.0123	0.0501	0.0112	0.0879	4.90
9/19/2022	138	8,742,054	3,085,956	0.0155	0.0490	0.0155	0.0870	4.42
12/19/2022	150	15,449,754	6,707,700	0.00561	0.0232	0.00561	0.0441	2.20
3/15/2023	141	21,230,472	5,780,718	0.00527	0.0139	0.00527	0.0202	1.23
6/14/2023	132	29,220,168	7,989,696	0.00494	0.0134	0.00494	0.0208	0.940
9/20/2023	132	38,728,920	9,508,752	0.00494	0.0179	0.00494	0.0397	1.82
12/14/2023	149	45,377,598	6,648,678	0.00557	0.0205	0.00557	0.0514	2.52
3/13/2024(2)	133	50,950,830	5,573,232	0.00497	0.0147	0.00497	0.0396	1.67
7/2/2024	146	62,898,594	11,947,764	0.00546	0.0125	0.00546	0.0301	1.03
9/12/2024	149	70,953,534	8,054,940	0.00557	0.0096	0.00557	0.0184	0.48
12/11/2024	162	78,914,214	7,960,680	0.00606	0.0088	0.00606	0.0185	0.39
3/12/2025	145	83,643,534	4,729,320	0.00542	0.0059	0.00542	0.0129	0.23
6/13/2025	158	94,312,326	10,668,792	0.00591	0.0068	0.00591	0.0177	0.32
			Average	0.00675	0.0265	0.00608	0.0487	2.97

Mass Removal and Emissions Summary

Date	Total SVE System Hours	Delta Hours	Benzene (pounds)	Toluene (pounds)	Ethylbenzene (pounds)	Total Xylenes (pounds)	TVPH (pounds)	TVPH (tons)
5/27/2022	0	0	-					
6/8/2022	154	154	1.10	8.17	0.649	15.3	1,549	0.774
6/20/2022	313	159	1.32	12.8	0.621	20.6	1,723	0.862
7/18/2022	676	363	1.82	16.0	1.00	22.7	1,644	0.822
8/15/2022	1,030	354	4.36	17.7	3.97	31.1	1,734	0.867
9/19/2022	1,403	373	5.77	18.3	5.77	32.4	1,648	0.824
12/19/2022	2,148	745	4.18	17.3	4.18	32.8	1,643	0.822
3/15/2023	2,832	683	3.60	9.5	3.60	13.8	840	0.420
6/14/2023	3,840	1,009	4.98	13.5	4.98	21.0	949	0.474
9/20/2023	5,041	1,201	5.93	21.5	5.93	47.7	2,190	1.10
12/14/2023	5,785	744	4.14	15.3	4.14	38.2	1,871	0.936
3/13/2024	6,483	698	3.47	10.3	3.47	27.7	1,167	0.584
7/2/2024	7,847	1,364	7.45	17.1	7.45	41.1	1,404	0.702
9/12/2024	8,748	901	5.02	8.6	5.02	16.6	430	0.215
12/11/2024	9,567	819	4.96	7.2	4.96	15.2	322	0.161
3/12/2025	10,111	544	2.95	3.2	2.95	7.0	123	0.061
6/13/2025	11,236	1,125	6.65	7.7	6.65	19.9	364	0.182
-	Total Ma	ss Recovery to Date	67.7	204.1	65.4	403	19,600	9.80

(1): average flow calculated from telemetry data beginning 9/21/2023

(2): flow rate for 3/13/2024 calcs based on January and February telemetry plus March site visit due to telemetry issues

cf: cubic feet

cfm: cubic feet per minute

μg/L: micrograms per liter lb/hr: pounds per hour

--: not sampled

PID: photoionization detector

ppm: parts per million

SVE: soil vapor extraction TVPH: total volatile petroleum hydrocarbons

gray: laboratory reporting limit used for calculating emissions

*: analytical results differ from those reported in the August 23, 2022 "Solar SVE System Update" due to unit conversion errors



APPENDIX A

Field Notes

Crage 89 of 112 Received by 0000 8/19/2020 2:38:18 PM 4-16-25 18:00 onsome Sunny John wind 95°F Main Vac 30 into Runtine 10,536 hr Flow 121.4 Cfm (in H20) Wells: 02 24 PTOH 20 101 NA volvo closed 037 24 21 23 OS PTO3 01 23 04 N/A volve closed 06 25 PT02 16:30 offste Released to Imaging: 8/29/2025 7:55:12 AM

Date 5-16-25 Received by OCD: 8/19/2025 2:38:13 PM

Location RV CO SV E 9:30 on sta + JSA, closing SVEOZ 10:00 collect readings Rixtim 10,89 % (L) Main Vac 40 (in 420) Flow 131.8 (of m) (in He0 VillaW closed Ø2_ VJA PTOY PTOI MA close) 30 PT03 29 30 30 06 N/A close PTOZ 32 10:30 offsite Released to Imaging: 8/29/2025 7:55:12 AM

419 328 Pta 3 26 113 01 77.9 27 04 Valvo closed 06 30 72.9 PT02

12:15 photographed damps to solor pomals 12:30 offsite to turn in somition to everofine.

WA



APPENDIX B

Project Photographs

PROJECT PHOTOGRAPHS

James Ranch Unit #10 Battery Eddy County, New Mexico Hilcorp Energy Company

Photograph 1

SVE System Post-Storm June 16, 2025 at 9:56 AM



Photograph 2

SVE System Post-Storm June 16, 2025 at 9:54 AM





APPENDIX C

Laboratory Analytical Reports & Chain-of-Custody Documentation

Environment Testing

ANALYTICAL REPORT

PREPARED FOR

Attn: Stuart Hyde Ensolum

601 N. Marienfeld St.

Suite 400

Midland, Texas 79701

Generated 6/16/2025 7:28:25 PM

JOB DESCRIPTION

James Ranch Unit #10 03C1558041 Rural Eddy, NM

JOB NUMBER

890-8291-1

Eurofins Carlsbad 1089 N Canal St. Carlsbad NM 88220

Eurofins Carlsbad

Job Notes

This report may not be reproduced except in full, and with written approval from the laboratory. The results relate only to the samples tested. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

Analytical test results meet all requirements of the associated regulatory program (i.e., NELAC (TNI), DoD, and ISO 17025) unless otherwise noted under the individual analysis.

Authorization

Generated 6/16/2025 7:28:25 PM

Authorized for release by Jessica Kramer, Project Manager <u>Jessica.Kramer@et.eurofinsus.com</u> (432)704-5440

Eurofins Carlsbad is a laboratory within Eurofins Environment Testing South Central, LLC, a company within Eurofins Environment Testing Group of Companies

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Client: Ensolum Project/Site: James Ranch Unit #10 03C1558041 Laboratory Job ID: 890-8291-1 SDG: Rural Eddy, NM

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Definitions/Glossary

Client: Ensolum Job ID: 890-8291-1 Project/Site: James Ranch Unit #10 03C1558041 SDG: Rural Eddy, NM

Qualifiers

GC/MS VOA

NEG

POS

PQL

QC

RER

RL RPD

TEF

TEQ

TNTC

PRES

Qualifier **Qualifier Description**

Indicates the analyte was analyzed for but not detected.

Glossary	
Abbreviation	These commonly used abbreviations may or may not be present in this report.
	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)

Eurofins Carlsbad

Negative / Absent

Positive / Present

Presumptive

Quality Control

Practical Quantitation Limit

Relative Error Ratio (Radiochemistry)

Toxicity Equivalent Factor (Dioxin)

Too Numerous To Count

Toxicity Equivalent Quotient (Dioxin)

Reporting Limit or Requested Limit (Radiochemistry)

Relative Percent Difference, a measure of the relative difference between two points

Case Narrative

Client: Ensolum Job ID: 890-8291-1

Project: James Ranch Unit #10 03C1558041

Job ID: 890-8291-1 Eurofins Carlsbad

Job Narrative 890-8291-1

Analytical test results meet all requirements of the associated regulatory program listed on the Accreditation/Certification Summary Page unless otherwise noted under the individual analysis. Data qualifiers and/or narrative comments are included to explain any exceptions, if applicable.

- Matrix QC may not be reported if insufficient sample is provided or site-specific QC samples were not submitted. In these
 situations, to demonstrate precision and accuracy at a batch level, a LCS/LCSD may be performed, unless otherwise
 specified in the method.
- Surrogate and/or isotope dilution analyte recoveries (if applicable) which are outside of the QC window are confirmed unless attributed to a dilution or otherwise noted in the narrative.

Regulated compliance samples (e.g. SDWA, NPDES) must comply with the associated agency requirements/permits.

Receipt

The sample was received on 6/13/2025 1:02 PM. Unless otherwise noted below, the sample arrived in good condition, and, where required, properly preserved and on ice.

Gasoline Range Organics

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

GC/MS VOA

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Eurofins Carlsbad

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Client Sample Results

Client: Ensolum

Project/Site: James Ranch Unit #10 03C1558041

SDG: Rural Eddy, NM

Client Sample ID: INFLUENT ALL WELLS

Date Collected: 06/13/25 11:55

Date Received: 06/13/25 13:02 Sample Container: Tedlar Bag 1L Lab Sample ID: 890-8291-1

Matrix: Air

ix: Air

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Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Gasoline Range Organics	716000		50000	ug/m3			06/14/25 16:16	1
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	104		60 - 140		-		06/14/25 16:16	1
- Method: SW846 8260C - Volat	ile Organic Comp	ounds (GC	MS)					
Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	<10000	U	10000	ug/m3			06/14/25 15:27	1
Toluene	13100		10000	ug/m3			06/14/25 15:27	1
Ethylbenzene	<10000	U	10000	ug/m3			06/14/25 15:27	1
m,p-Xylenes	35600		20000	ug/m3			06/14/25 15:27	1
o-Xylene	<10000	U	10000	ug/m3			06/14/25 15:27	1
Xylenes, Total	35600		20000	ug/m3			06/14/25 15:27	1
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	102		70 - 135		-		06/14/25 15:27	

Surrogate Summary

Client: Ensolum Job ID: 890-8291-1
Project/Site: James Ranch Unit #10 03C1558041 SDG: Rural Eddy, NM

Method: 8260C - Volatile Organic Compounds (GCMS)

Matrix: Air Prep Type: Total/NA

			Percent Surrogate Recovery (Acceptance Limits)
		BFB	
Lab Sample ID	Client Sample ID	(70-135)	
890-8291-1	INFLUENT ALL WELLS	102	
LCS 860-242513/3	Lab Control Sample	99	
LCSD 860-242513/4	Lab Control Sample Dup	99	
MB 860-242513/6	Method Blank	95	
Surrogate Legend			
BFB = 4-Bromofluorobe	enzene (Surr)		

Method: 8260C GRO - Volatile Organic Compounds (GC/MS)

Matrix: Air Prep Type: Total/NA

			Percent Surrogate Recovery (Acceptance Limits)
		BFB	
Lab Sample ID	Client Sample ID	(60-140)	
890-8291-1	INFLUENT ALL WELLS	104	
LCS 860-242493/1010	Lab Control Sample	102	
LCSD 860-242493/11	Lab Control Sample Dup	101	
MB 860-242493/13	Method Blank	98	
Surrogate Legend			

BFB = 4-Bromofluorobenzene (Surr)

Eurofins Carlsbad

QC Sample Results

Job ID: 890-8291-1 Client: Ensolum Project/Site: James Ranch Unit #10 03C1558041 SDG: Rural Eddy, NM

Method: 8260C - Volatile Organic Compounds (GCMS)

Lab Sample ID: MB 860-242513/6

Matrix: Air

Analysis Batch: 242513

Client Sample ID: Method Blank

Prep Type: Total/NA

MB MB Analyte Result Qualifier RLUnit D Prepared Analyzed Dil Fac Benzene <10000 U 10000 ug/m3 06/14/25 15:03 Toluene <10000 U 10000 ug/m3 06/14/25 15:03 Ethylbenzene <10000 U 10000 ug/m3 06/14/25 15:03 m,p-Xylenes <20000 20000 ug/m3 06/14/25 15:03 o-Xylene <10000 U 10000 ug/m3 06/14/25 15:03 <20000 U 06/14/25 15:03 Xylenes, Total 20000 ug/m3

MB MB

%Recovery Qualifier Limits Dil Fac Surrogate Prepared Analyzed 70 - 135 4-Bromofluorobenzene (Surr) 06/14/25 15:03 95

Lab Sample ID: LCS 860-242513/3 Client Sample ID: Lab Control Sample Matrix: Air Prep Type: Total/NA

Analysis Batch: 242513

LCS LCS %Rec Spike Analyte Added Result Qualifier Unit D %Rec Limits Benzene 50000 41060 ug/m3 82 70 - 125 Toluene 50000 49090 ug/m3 98 70 - 125 Ethylbenzene 50000 51300 ug/m3 103 70 - 125 52300 50000 ug/m3 105 70 - 125 m,p-Xylenes 50000 52280 o-Xylene ug/m3 105 70 - 125

LCS LCS

Qualifier Limits Surrogate %Recovery 4-Bromofluorobenzene (Surr) 99 70 - 135

Lab Sample ID: LCSD 860-242513/4

Matrix: Air

Analysis Batch: 242513

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

LCSD LCSD Spike %Rec RPD Analyte Added Result Qualifier Unit D %Rec Limits **RPD** Limit 50000 42120 84 70 - 125 35 Benzene ug/m3 3 Toluene 50000 50150 ug/m3 100 70 - 125 2 35 Ethylbenzene 50000 52580 ug/m3 105 70 - 125 35 m,p-Xylenes 50000 52810 ug/m3 106 70 - 125 35 50000 52700 ug/m3 105 70 - 125 35 o-Xylene

LCSD LCSD

%Recovery Qualifier Surrogate Limits 4-Bromofluorobenzene (Surr) 99 70 - 135

Method: 8260C GRO - Volatile Organic Compounds (GC/MS)

Lab Sample ID: MB 860-242493/13

Matrix: Air

Analysis Batch: 242493

Client Sample ID: Method Blank Prep Type: Total/NA

мв мв Analyte Result Qualifier RI Unit D Prepared Analyzed Dil Fac Gasoline Range Organics <50000 50000 ug/m3 06/14/25 15:53

Eurofins Carlsbad

QC Sample Results

Job ID: 890-8291-1 Client: Ensolum Project/Site: James Ranch Unit #10 03C1558041 SDG: Rural Eddy, NM

Method: 8260C GRO - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: MB 860-242493/13

Client Sample ID: Method Blank Matrix: Air Prep Type: Total/NA

Analysis Batch: 242493

MB MB Surrogate %Recovery Qualifier Limits Prepared Analyzed Dil Fac 4-Bromofluorobenzene (Surr) 98 60 - 140 06/14/25 15:53

Lab Sample ID: LCS 860-242493/1010 Client Sample ID: Lab Control Sample Matrix: Air Prep Type: Total/NA

Analysis Batch: 242493 Spike LCS LCS

%Rec Analyte Added Result Qualifier Unit %Rec Limits Gasoline Range Organics 500000 523700 ug/m3 105 57 - 134

LCS LCS Surrogate %Recovery Qualifier Limits 4-Bromofluorobenzene (Surr) 102 60 - 140

Lab Sample ID: LCSD 860-242493/11 Client Sample ID: Lab Control Sample Dup Matrix: Air Prep Type: Total/NA

Analysis Batch: 242493

Spike LCSD LCSD %Rec RPD Analyte Added Result Qualifier Limits RPD Limit Unit D %Rec Gasoline Range Organics 500000 552800 ug/m3 111 57 - 134 5 35

%Recovery Qualifier Limits Surrogate 4-Bromofluorobenzene (Surr) 101 60 - 140

LCSD LCSD

Eurofins Carlsbad

QC Association Summary

Client: Ensolum

Project/Site: James Ranch Unit #10 03C1558041

SDG: Rural Eddy, NM

GC/MS VOA

Analysis Batch: 242493

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
890-8291-1	INFLUENT ALL WELLS	Total/NA	Air	8260C GRO	
MB 860-242493/13	Method Blank	Total/NA	Air	8260C GRO	
LCS 860-242493/1010	Lab Control Sample	Total/NA	Air	8260C GRO	
LCSD 860-242493/11	Lab Control Sample Dup	Total/NA	Air	8260C GRO	

Analysis Batch: 242513

ı	Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
8	890-8291-1	INFLUENT ALL WELLS	Total/NA	Air	8260C	
ı	MB 860-242513/6	Method Blank	Total/NA	Air	8260C	
ı	LCS 860-242513/3	Lab Control Sample	Total/NA	Air	8260C	
ı	LCSD 860-242513/4	Lab Control Sample Dup	Total/NA	Air	8260C	

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Lab Chronicle

Client: Ensolum Job ID: 890-8291-1
Project/Site: James Ranch Unit #10 03C1558041 SDG: Rural Eddy, NM

Client Sample ID: INFLUENT ALL WELLS

Lab Sample ID: 890-8291-1

Date Collected: 06/13/25 11:55 Matrix: Air

Date Received: 06/13/25 13:02

	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	5 mL	5 mL	242513	06/14/25 15:27	KLV	EET HOU
Total/NA	Analysis	8260C GRO		1	5 mL	5 mL	242493	06/14/25 16:16	KLV	EET HOU

Laboratory References:

EET HOU = Eurofins Houston, 4145 Greenbriar Dr, Stafford, TX 77477, TEL (281)240-4200

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Accreditation/Certification Summary

Client: Ensolum

Job ID: 890-8291-1

Project/Site: James Ranch Unit #10 03C1558041

SDG: Rural Eddy, NM

Laboratory: Eurofins Houston

Unless otherwise noted, all analytes for this laboratory were covered under each accreditation/certification below.

Authority	Progra	am	Identification Number	Expiration Date
Texas	NELA	Р	T104704215	06-30-25
,	are included in this report, bu	ut the laboratory is not certif	ied by the governing authority. This lis	t may include analyte
Analysis Method	Prep Method	Matrix	Analyte	
8260C		Air	Benzene	
8260C		Air	Ethylbenzene	
8260C		Air	m,p-Xylenes	
8260C		Air	o-Xylene	
8260C		Air	Toluene	
8260C		Air	Xylenes, Total	
8260C GRO		Air	Gasoline Range Organics	

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Method Summary

Client: Ensolum

Project/Site: James Ranch Unit #10 03C1558041

Job ID: 890-8291-1

SDG: Rural Eddy, NM

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Method	Method Description	Protocol	Laboratory
8260C	Volatile Organic Compounds (GCMS)	SW846	EET HOU
8260C GRO	Volatile Organic Compounds (GC/MS)	SW846	EET HOU
5030C	Collection/Prep Tedlar Bag (P&T)	SW846	EET HOU

Protocol References:

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

Laboratory References:

EET HOU = Eurofins Houston, 4145 Greenbriar Dr, Stafford, TX 77477, TEL (281)240-4200

Sample Summary

Client: Ensolum

Project/Site: James Ranch Unit #10 03C1558041

Job ID: 890-8291-1

SDG: Rural Eddy, NM

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
890-8291-1	INFLUENT ALL WELLS	Air	06/13/25 11:55	06/13/25 13:02



AIR SAMPLING CHAIN OF CUSTODY

Xenco Job #:	X	e	n	C	0	J	0	b	#:	
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Stafford, Texas (281-240-4200)

San Antonio, Texas (210-509-3334)

Phoenix, Arizona (480-355-0900)

Dallas, Texas (214-902-0300)

Lubbock, TX (806-794-1296)

Midland, TX (432-704-5251)

El Paso, TX (915-585-3443)

Setting the Standard since 1990

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	Contact: Stuart Hyde		- -	,					fiel	fiel							
Email: shyde@ensolum.com Ph.No.: 337-257-8307				Soil		_	Ë	<u>=</u> .	م ا								
	Name & No.: James Ranch Unit #10, 03C1558041				= S nbie		든	ure	nre	ste La							
	e Location: Rural Eddy, NM																
							9	lng	Canister Pressure in field ("Hg) Start Canister Pressure in field ("Hg) Stop Incoming Canister Pressure ("Hg) Lab TVPH(8015) BTEX(8021)								
Cost Center: 1135831001 AFE: EW.2019.03368.EXP.01			I = Indoor Vapor A	Canister ID	& &	stel St	Canister Programme ("'Hg) Stop	Incoming Pressure	(8)	8							
Sample						= = =	anii	- NO	ani Hg	anis Hg)	COL	호	印				
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3) Relin	quished By:	Date/Time	ate/Time		(3) Received By:		Special Requests/Instructions: Collected 2-1 Liter Tedlar bags. Bill to: Amy Ruth, XTO Energy, Inc., Address: 3104 E. Green St. Carlsbad, NM										
(4) Relinquished By: Date/Time (4) Received By:											_						











Login Sample Receipt Checklist

Client: Ensolum Job Number: 890-8291-1 SDG Number: Rural Eddy, NM

List Source: Eurofins Carlsbad

Login Number: 8291 List Number: 1

Creator: Bruns, Shannon

Question	Answer	Comment
The cooler's custody seal, if present, is intact.	True	
Sample custody seals, if present, are intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	N/A	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	N/A	Refer to Job Narrative for details.
Sample bottles are completely filled.	True	
Sample Preservation Verified.	N/A	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	N/A	

Page 16 of 17

6/16/2025

Login Sample Receipt Checklist

Client: Ensolum

Job Number: 890-8291-1

SDG Number: Rural Eddy, NM

List Source: Eurofins Houston

List Creation: 06/14/25 10:37 AM

Login Number: 8291 List Number: 2

Creator: Grandits, Corey

Question	Answer	Comment
The cooler's custody seal, if present, is intact.	N/A	
Sample custody seals, if present, are intact.	N/A	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	True	

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

General Information Phone: (505) 629-6116

Online Phone Directory https://www.emnrd.nm.gov/ocd/contact-us

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

CONDITIONS

Action 497328

CONDITIONS

Operator:	OGRID:		
XTO ENERGY, INC	5380		
6401 Holiday Hill Road	Action Number:		
Midland, TX 79707	497328		
	Action Type:		
	[REPORT] Alternative Remediation Report (C-141AR)		

CONDITIONS

Create By	d Condition	Condition Date
nvel	None None	8/29/2025