

**From:** [Hall, Brittany, EMNRD](#)  
**To:** [thillard@ensolum.com](mailto:thillard@ensolum.com)  
**Cc:** [Rodgers, Scott, EMNRD](#); [Enviro, OCD, EMNRD](#); [Tacoma Morrissey](#); [bbeill@ensolum.com](mailto:bbeill@ensolum.com); [jreich@ensolum.com](mailto:jreich@ensolum.com); [robert.d.woodall@exxonmobil.com](mailto:robert.d.woodall@exxonmobil.com); [richard.kotzur@exxonmobil.com](mailto:richard.kotzur@exxonmobil.com); [Romero, Rosa, EMNRD](#); [Minnix, Sharon, EMNRD](#); [Bratcher, Michael, EMNRD](#)  
**Subject:** RE: [EXTERNAL] XTO - Sampling Plan - Highlander Compressor Station - nAPP2606139393  
**Date:** Wednesday, April 29, 2026 9:42:00 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[XTO\\_Sampling\\_Plan\\_Appendicies\\_Highlander\\_CS\\_nAPP2606139393.pdf](#)

---

Tracy,

At this time, the alternative sampling plan is denied. OCD will not approve alternative sampling plans that have pending site characterization work (pedestrian watercourse survey). An alternative sampling plan can be submitted once all site characterization work is completed and a definitive Table I release closure criteria can be determined. Please be advised that the presence of lease roads and pads interrupting or disrupting the flow of any watercourse does not exclude these features from being defined as a watercourse. Pursuant to 19.15.29.13 A. "The responsible party must substantially restore the impacted surface areas to the condition that existed prior to the release or their final land use. Restoration of the site must include the replacement of removed material and must be replaced to the near original relative positions and contoured to achieve erosion control, long term stability and preservation of surface water flow patterns" and 19.15.29.13 D. NMAC, "Reclamation of areas no longer in use. The responsible party shall reclaim all areas disturbed by the remediation and closure, except areas reasonably needed for production operations or for subsequent drilling operations, as early and as nearly as practical to their original condition or their final land use and maintain those areas to control dust and minimize erosion to the extent practical."

Additionally, the variance to utilize the delineation soil samples as confirmation soil samples is denied. Pursuant to 19.15.29.14 A. NMAC, "A responsible party may file a written request for a variance from any requirement of 19.15.29 NMAC with the appropriate division district office. The variance request must include: (1) a detailed statement explaining the need for a variance; and (2) a detailed written demonstration that the variance will provide equal or better protection of fresh water, public health and the environment." The variance request as written, does not include a detailed statement explaining the need for a variance or a detailed written demonstration that the variance will provide equal or better protection of fresh water, public health, and the environment

A complete and accurate remediation plan or remediation closure report must be

submitted through the OCD Permitting website by May 26, 2026.

Thank you,

**Brittany Hall** ● Environmental Field Compliance Supervisor  
Environmental Field Compliance Group  
EMNRD - Oil Conservation Division  
1000 Rio Brazos Road | Aztec, NM 87410  
505.517.5333 | [Brittany.Hall@emnrd.nm.gov](mailto:Brittany.Hall@emnrd.nm.gov)  
<http://www.emnrd.nm.gov/oecd/>

Effective 12/1/2024: OCD has updated guidance on karst potential occurrence zones. This notice can be found at: <https://www.emnrd.nm.gov/oecd/oecd-announcements-and-notifications/> under “2024 OCD ANNOUNCEMENTS AND NOTIFICATIONS”.

The Digital C-141 guidance documents can be found at <https://www.emnrd.nm.gov/oecd/oecd-announcements-and-notifications/> or <https://www.emnrd.nm.gov/oecd/oecd-forms/>.

---

**From:** Tracy Hillard <[thillard@ensolum.com](mailto:thillard@ensolum.com)>  
**Sent:** Wednesday, April 22, 2026 8:52 AM  
**To:** Enviro, OCD, EMNRD <[OCD.Enviro@emnrd.nm.gov](mailto:OCD.Enviro@emnrd.nm.gov)>  
**Cc:** Tacoma Morrissey <[tmorrissey@ensolum.com](mailto:tmorrissey@ensolum.com)>; Ben Belill <[bbelill@ensolum.com](mailto:bbelill@ensolum.com)>; Jeremy Reich <[jreich@ensolum.com](mailto:jreich@ensolum.com)>; Woodall, Robert D <[robert.d.woodall@exxonmobil.com](mailto:robert.d.woodall@exxonmobil.com)>; Kotzur, Richard <[richard.kotzur@exxonmobil.com](mailto:richard.kotzur@exxonmobil.com)>  
**Subject:** [EXTERNAL] XTO - Sampling Plan - Highlander Compressor Station - nAPP2606139393

You don't often get email from [thillard@ensolum.com](mailto:thillard@ensolum.com). [Learn why this is important](#)

**CAUTION:** This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Good morning-

Ensolum, LLC (Ensolum), on behalf of XTO Energy, Inc. (XTO), has prepared this Sampling Plan to confirm sampling locations at the Highlander Compressor Station (Site).

The incident was initially reported in Unit F, Section 22, Township 24 South, Range 30 East, but after review of incident location and photographs taken during the Site assessment, it was confirmed that the affected area extended into Units F through J, Section 22, Township 24 South, Range 30 East, in Eddy County, New Mexico (32.205257°, -103.869405°) and is associated with oil and gas exploration and production operations on Federal land managed by the Bureau of Land Management (BLM).

On February 25, 2026, a flare malfunction resulted in a flare fire which ignited the adjacent pasture grass and the fire spread due to high winds. No fluids were released. Eddy County Fire Department responded and extinguished the fire. Approximately 1,357,910 square feet of pasture grasses were burned by the fire. XTO submitted a Notification of Release (NOR) and an Initial C-141 Application (C-141) on March 2, 2026, to the New Mexico Oil Conservation Division (NMOCD) and NMOCD assigned Incident Number nAPP2606139393.

The Site was characterized to determine the applicable Closure Criteria and assess for the presence of sensitive receptors. Depth to groundwater at the Site is estimated to be greater than 100 feet below ground surface (bgs) based on the nearest groundwater well data. On January 16, 2025, a New Mexico Office of the State Engineer (NMOSE) permitted well (C-4911) was advanced to a depth of 105 feet bgs approximately 0.28 miles north of the Site. No groundwater or moisture was encountered during drilling operations. The well was properly plugged and abandoned with drill cuttings and hydrated bentonite chips. The Well Record & Log is included in Appendix A of the attached document.

The closest continuously flowing or significant watercourse to the Site is an intermittently flooded discontinuous riverine located within the Site. Based on a review of aerial imagery, it appears the discontinuous riverine no longer is present due to the presence of lease roads and pads. A pedestrian watercourse survey will be conducted to confirm the presence or absence of the mapped feature. The second closest continuously flowing or significant watercourse to the Site is an intermittently flooded continuous riverine located 3,544 feet north of the Site. The Site is greater than 200 feet from a lakebed, sinkhole, or playa lake and greater than 300 feet from an occupied residence, school, hospital, institution, church, or wetland. The Site is greater than 1,000 feet to a freshwater well or spring and is not within a 100-year floodplain or overlying a subsurface mine. The Site is not underlain by unstable geology (low potential karst designation area). Potential Site receptors are identified on Figure 1.

Based on the results of the Site Characterization prior to confirmation of the watercourse, the following NMOCD Table I Closure Criteria (Closure Criteria) apply:

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

A reclamation requirement of 600 mg/kg chloride and 100 mg/kg TPH applies to the top 4 feet of the off-pad area that was impacted by the incident, per 19.15.29.13.D (1) NMAC for the top 4 feet of areas that will be reclaimed following remediation regardless of the results of the pedestrian watercourse survey.

Due to the high level of confidence that no fluids impacted the scorched area, XTO is proposing collection of delineation soil samples collected in 42 locations (BH01 through BH42). The soil samples will be collected at surface and 0.5 feet bgs to confirm the absence of impacts. In addition, XTO proposes collecting 32 lateral delineation samples (SS01 through SS32) to confirm the lateral extent. The proposed delineation soil sample locations are presented on Figure 2. The soil samples will be field screened for volatile organic compounds (VOCs) and chlorides and submitted to an approved laboratory for the analysis of benzene, BTEX, TPH, and chloride.

Following a review of the laboratory analytical results, if no impacted or waste-containing soil is identified, XTO requests a variance to utilize the delineation soil samples as confirmation soil samples. Soil sampling notifications will be submitted at least 48 hours in advance of the delineation soil sampling activities.

XTO requests approval of this Sampling Plan and communication of any additional sampling requests for Incident Number nAPP2606139393.

Thank you,

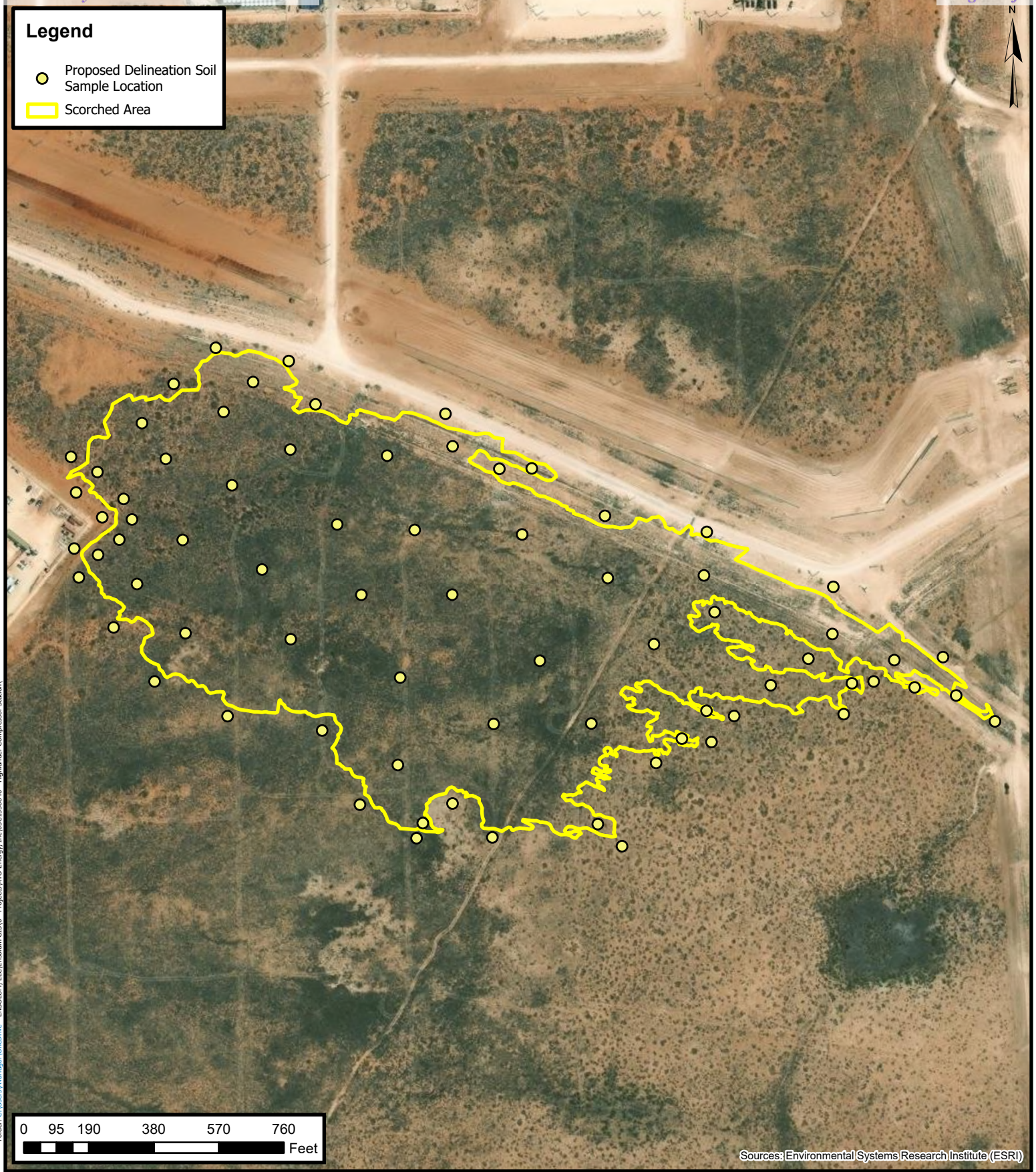


**Tracy Hillard**  
Project Engineer  
575-937-3906  
**Ensolum, LLC**  
in f X



FIGURES





**Proposed Sampling Locations**  
 XTO Energy, Inc  
 Highlander Compressor Station  
 Incident Number: nAPP2606139393  
 Unit F, Section 22, T 24S, R 30E  
 Eddy County, New Mexico

**FIGURE 2**



## APPENDIX A

### Referenced Well Records

---



# WELL RECORD & LOG

## OFFICE OF THE STATE ENGINEER

[www.ose.state.nm.us](http://www.ose.state.nm.us)

1. GENERAL AND WELL LOCATION	OSE POD NO. (WELL NO.) POD 1 (TW-1)		WELL TAG ID NO. N/A		OSE FILE NO(S). C-4911			
	WELL OWNER NAME(S) XTO Energy, Inc.				PHONE (OPTIONAL)			
	WELL OWNER MAILING ADDRESS 3104 E. Greene St.				CITY Carlsbad	STATE NM	ZIP 88220	
	WELL LOCATION (FROM GPS)	DEGREES 32		MINUTES 12	SECONDS 32.23	* ACCURACY REQUIRED: ONE TENTH OF A SECOND * DATUM REQUIRED: WGS 84		
		LATITUDE		103	51			54.46
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS - PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE NE NW NE Sec. 22, T 24S R30E								
2. DRILLING & CASING INFORMATION	LICENSE NO. 1249		NAME OF LICENSED DRILLER Jackie D. Atkins			NAME OF WELL DRILLING COMPANY Atkins Engineering Associates, Inc.		
	DRILLING STARTED 01/16/2025	DRILLING ENDED 01/16/2025	DEPTH OF COMPLETED WELL (FT) Temporary Well Material		BORE HOLE DEPTH (FT) ±105	DEPTH WATER FIRST ENCOUNTERED (FT) N/A		
	COMPLETED WELL IS: <input type="checkbox"/> ARTESIAN *add Centralizer info below <input checked="" type="checkbox"/> DRY HOLE <input type="checkbox"/> SHALLOW (UNCONFINED)				STATIC WATER LEVEL IN COMPLETED WELL (FT) N/A	DATE STATIC MEASURED 1/16/25, 1/24/25		
	DRILLING FLUID: <input type="checkbox"/> AIR <input type="checkbox"/> MUD ADDITIVES - SPECIFY:							
	DRILLING METHOD: <input type="checkbox"/> ROTARY <input type="checkbox"/> HAMMER <input type="checkbox"/> CABLE TOOL <input checked="" type="checkbox"/> OTHER - SPECIFY: Hollow Stem Auger					CHECK HERE IF PITLESS ADAPTER IS INSTALLED <input type="checkbox"/>		
	DEPTH (feet bgl)		BORE HOLE DIAM (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)	CASING CONNECTION TYPE (add coupling diameter)	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)	SLOT SIZE (inches)
	FROM	TO						
	0	104	±6.25	Soil Boring	--	--	--	--
3. ANNULAR MATERIAL	DEPTH (feet bgl)		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL <i>*(if using Centralizers for Artesian wells- indicate the spacing below)</i>	AMOUNT (cubic feet)	METHOD OF PLACEMENT		
	FROM	TO						
				N/A				

OSE DII ROSWELL NM  
10 FEB 25 PM 1:43

FOR OSE INTERNAL USE			WR-20 WELL RECORD & LOG (Version 09/22/2022)		
FILE NO. <b>C-4911</b>	POD NO. <b>1</b>	TRN NO. <b>771442</b>			
LOCATION <b>24S. 30E. 22 212</b>	WELL TAG ID NO. <b>NA</b>	PAGE 1 OF 2			





Appendix B  
Photographic Log

---





## Photographic Log

XTO Energy, Inc

Highlander Compressor Station



nAPP2606139393

<p><u>Photograph</u> 1</p>	<p><u>Date</u> 3/3/2026</p>	<p>Date &amp; Time: Tue, Mar 03, 2026 at 08:53:23 MST            Position: +032.204108° / -103.869128° (±5.0m)            Altitude: 1033m (±9.5m)            Datum: WGS-84            Azimuth/Bearing: 082° N82E 1458mils True (±68°)            Elevation Angle: -03.0°            Horizon Angle: -00.2°            Zoom: 1.0X</p> 
<p><u>Description</u> Scorching in pasture</p>		
<p><u>View</u> East</p>		
<p><u>Photograph</u> 2</p>	<p><u>Date</u> 3/3/2026</p>	<p>Date &amp; Time: Tue, Mar 03, 2026 at 08:53:24 MST            Position: +032.204108° / -103.869129° (±5.0m)            Altitude: 1033m (±9.5m)            Datum: WGS-84            Azimuth/Bearing: 043° N43E 0764mils True (±35°)            Elevation Angle: -03.1°            Horizon Angle: +00.6°            Zoom: 1.0X</p> 
<p><u>Description</u> Scorching in pasture</p>		
<p><u>View</u> Northeast</p>		



## Photographic Log

XTO Energy, Inc  
 Highlander Compressor Station  
 nAPP2606139393

<p><u>Photograph</u> 3</p>	<p><u>Date</u> 3/3/2026</p>	<p>Date &amp; Time: Tue, Mar 03, 2026 at 08:53:26 MST                  Position: +032.204108° / -103.869130° (±5.0m)                  Altitude: 1034m (±9.5m)                  Datum: WGS-84                  Azimuth/Bearing: 352° N08W 6258mils True (±29°)                  Elevation Angle: -04.4°                  Horizon Angle: +00.2°                  Zoom: 1.0X</p> 
<p><u>Description</u> Scorching in pasture near flare</p>		
<p><u>View</u> North</p>		
<p><u>Photograph</u> 4</p>	<p><u>Date</u> 3/3/2026</p>	<p>Date &amp; Time: Tue, Mar 03, 2026 at 08:53:27 MST                  Position: +032.204108° / -103.869130° (±5.0m)                  Altitude: 1034m (±9.5m)                  Datum: WGS-84                  Azimuth/Bearing: 323° N37W 5742mils True (±27°)                  Elevation Angle: -03.5°                  Horizon Angle: +00.6°                  Zoom: 1.0X</p> 
<p><u>Description</u> Scorching in pasture near flare</p>		
<p><u>View</u> Northwest</p>		

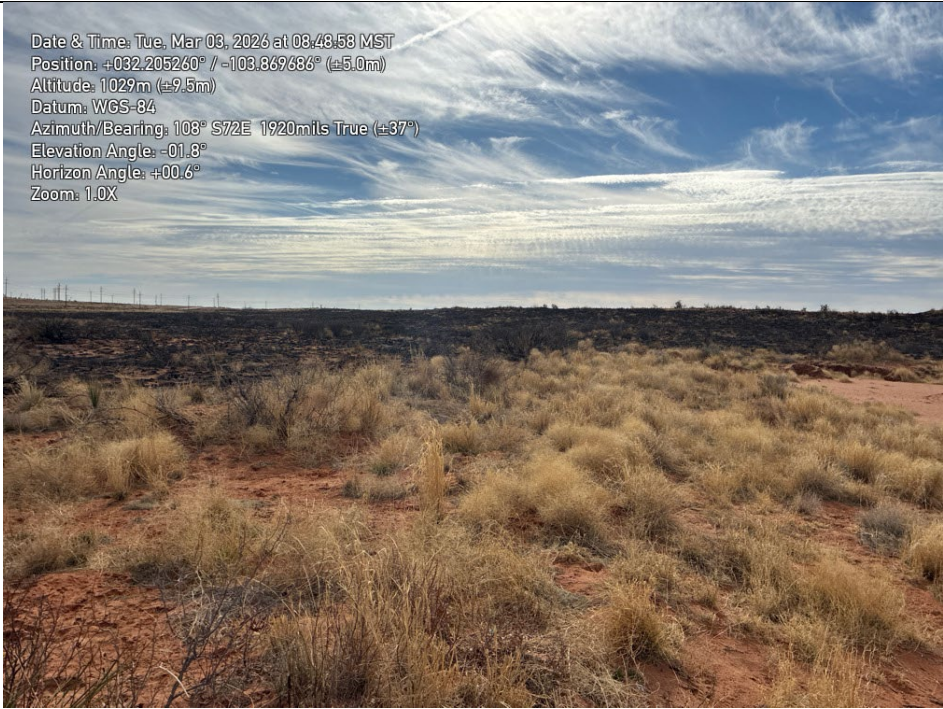



## Photographic Log

XTO Energy, Inc

Highlander Compressor Station



nAPP2606139393

<p><b>Photograph</b> 5</p>	<p><b>Date</b> 3/3/2026</p>	<p>Date &amp; Time: Tue, Mar 03, 2026 at 08:48:58 MST          Position: +032.205260° / -103.869686° (±5.0m)          Altitude: 1029m (±9.5m)          Datum: WGS-84          Azimuth/Bearing: 108° S72E 1920mils True (±37°)          Elevation Angle: -01.8°          Horizon Angle: +00.6°          Zoom: 1.0X</p> 
<p><b>Description</b> Scorching in pasture</p>		
<p><b>View</b> Southeast</p>		
<p><b>Photograph</b> 6</p>	<p><b>Date</b> 3/3/2026</p>	<p>Date &amp; Time: Tue, Mar 03, 2026 at 07:54:12 MST          Position: +032.204743° / -103.863400° (±2.0m)          Altitude: 1039m (±3.0m)          Datum: WGS-84          Azimuth/Bearing: 292° N68W 5191mils True (±10°)          Elevation Angle: -03.0°          Horizon Angle: +00.8°          Zoom: 1.0X</p> 
<p><b>Description</b> Scorching in pasture</p>		
<p><b>View</b> Northwest</p>		



## Photographic Log

XTO Energy, Inc  
 Highlander Compressor Station  
 nAPP2606139393

<p><b>Photograph</b> 7</p>	<p><b>Date</b> 3/3/2026</p>	<p>Date &amp; Time: Tue, Mar 03, 2026 at 08:43:44 MST                  Position: +032.205227° / -103.867635° (±5.0m)                  Altitude: 1028m (±9.5m)                  Datum: WGS-84                  Azimuth/Bearing: 238° N72W 5120mils True (±31°)                  Elevation Angle: -02.2°                  Horizon Angle: +01.3°                  Zoom: 1.0X</p>
<p><b>Description</b> Scorching in pasture</p>		
<p><b>View</b> Northwest</p>		
<p><b>Photograph</b> 8</p>	<p><b>Date</b> 3/3/2026</p>	<p>Date &amp; Time: Tue, Mar 03, 2026 at 08:48:57 MST                  Position: +032.205259° / -103.869686° (±5.0m)                  Altitude: 1029m (±9.5m)                  Datum: WGS-84                  Azimuth/Bearing: 083° N83E 1476mils True (±44°)                  Elevation Angle: -05.9°                  Horizon Angle: +01.2°                  Zoom: 1.0X</p>
<p><b>Description</b> Scorching in pasture</p>		
<p><b>View</b> Northeast</p>		

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 580162

**CONDITIONS**

Operator: XTO ENERGY, INC 3617 North Big Spring Street Midland, TX 79705	OGRID: 5380
	Action Number: 580162
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

**CONDITIONS**

Created By	Condition	Condition Date
bhall	Upload of email correspondence of denied alternative sampling plan and variance request.	4/29/2026