

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

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

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

| | |
|----------------|----------|
| Incident ID | 2RP-5629 |
| District RP | |
| Facility ID | |
| Application ID | |

Release Notification

Responsible Party

| | |
|-----------------------------------------------------------|--------------------------------|
| Responsible Party XTO Energy | OGRID 5380 |
| Contact Name Kyle Littrell | Contact Telephone 432-221-7331 |
| Contact email Kyle_Littrell@xtoenergy.com | Incident # (assigned by OCD) |
| Contact mailing address 522 W. Mermod, Carlsbad, NM 88220 | |

Location of Release Source

Latitude 32.123045 Longitude -103.806318
(NAD 83 in decimal degrees to 5 decimal places)

| | |
|--------------------------------------------------|-------------------------------------------------------------|
| Site Name PLU Phantom Banks 20-25-31 USA Battery | Site Type Bulk Storage and Separation Facility |
| Date Release Discovered 8/20/2019 | API# (if applicable) 30-015-40764 (Poker Lake CVX JV PB 6H) |

| Unit Letter | Section | Township | Range | County |
|-------------|---------|----------|-------|--------|
| D | 20 | 25S | 31E | Eddy |

Surface Owner: State Federal Tribal Private (Name: BLM)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

| | | |
|----------------------------------------------------|------------------------------------------------------------------------------------------|----------------------------------------------------------|
| <input type="checkbox"/> Crude Oil | Volume Released (bbls) | Volume Recovered (bbls) |
| <input checked="" type="checkbox"/> Produced Water | Volume Released (bbls) 10 | Volume Recovered (bbls) 10 |
| | Is the concentration of total dissolved solids (TDS) in the produced water >10,000 mg/l? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <input type="checkbox"/> Condensate | Volume Released (bbls) | Volume Recovered (bbls) |
| <input type="checkbox"/> Natural Gas | Volume Released (Mcf) | Volume Recovered (Mcf) |
| <input type="checkbox"/> Other (describe) | Volume/Weight Released (provide units) | Volume/Weight Recovered (provide units) |

Cause of Release
A seal on a produced water transfer pump leaked fluid into tank battery containment. The pump was isolated until it can be repaired. Vacuum truck returned all free fluid to tank. No fluids were seen outside/around containment area. A 48-hour advance notice of liner inspection was provided by email to NMOCD District 2. The liner was visually inspected and determined to be inadequate. Liner is scheduled for repair and returned to impervious condition. XTO requests deferral of potential impacts under liner until facility upgrades or is abandoned. It is XTO safety policy to restrict subsurface disturbance to within 3 ft of equipment. The containment is congested by lines, tanks, and equipment making it impossible to access for vertical delineation via heavy equipment or drill rig.

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Oil Conservation Division

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|----------------|--|
| Incident ID | |
| District RP | |
| Facility ID | |
| Application ID | |

| | |
|---------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|
| Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | If YES, for what reason(s) does the responsible party consider this a major release? N/A |
| If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? N/A | |

Initial Response

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

| |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately. |
| If all the actions described above have <u>not</u> been undertaken, explain why: N/A |
| Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation. |
| 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: <u>Kyle Littrell</u> Title: <u>SH&E Supervisor</u> Signature: <u></u> Date: <u>9/4/2019</u> email: <u>Kyle_Littrell@xtoenergy.com</u> Telephone: <u>432-221-7331</u> |
| <u>OCD Only</u> Received by: _____ Date: _____ |

| | |
|----------------|----------|
| Incident ID | |
| District RP | 2RP-5629 |
| 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? | _>100_ (ft bgs) |
| Did this release impact groundwater or surface water? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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)? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 1000 feet of any other fresh water well or spring? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 300 feet of a wetland? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release overlying a subsurface mine? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release overlying an unstable area such as karst geology? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within a 100-year floodplain? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Did the release impact areas not on an exploration, development, production, or storage site? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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.

| |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Characterization Report Checklist: <i>Each of the following items must be included in the report.</i></p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells. <input checked="" type="checkbox"/> Field data <input checked="" type="checkbox"/> Data table of soil contaminant concentration data <input checked="" type="checkbox"/> Depth to water determination <input checked="" type="checkbox"/> Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release <input checked="" type="checkbox"/> Boring or excavation logs <input checked="" type="checkbox"/> Photographs including date and GIS information <input checked="" type="checkbox"/> Topographic/Aerial maps <input checked="" type="checkbox"/> 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.

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Oil Conservation Division

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|----------------|----------|
| Incident ID | |
| District RP | 2RP-5629 |
| Facility ID | |
| Application ID | |

Closure

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

Closure Report Attachment Checklist: *Each of the following items must be included in the closure report.*

- A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Kyle Littrell Title: SH&E Supervisor
 Signature:  Date: 12/06/2019
 email: Kyle_Littrell@xtoenergy.com Telephone: 432-221-7331

OCD Only

Received by: _____ Date: _____

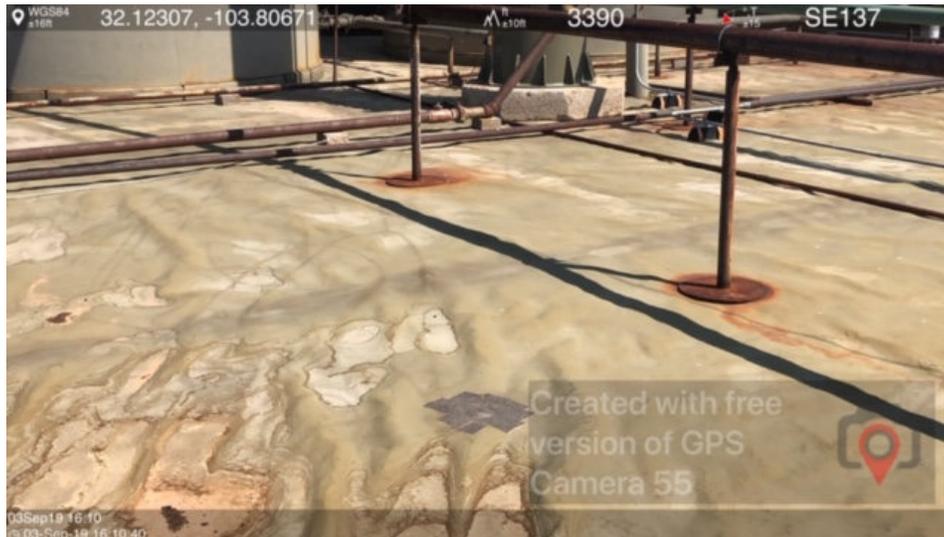
Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____

PLU Phantom Banks 20-25-31 USA Battery (30-015-40764 Poker Lake CVX JV PB
6H)

Spill Date: 8/20/2019



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

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|-----------------------|--|
| <u>Incident ID</u> | |
| <u>District RP</u> | |
| <u>Facility ID</u> | |
| <u>Application ID</u> | |

Release Notification

Responsible Party

| | |
|-----------------------------------------------------------|--------------------------------|
| Responsible Party XTO Energy | OGRID 5380 |
| Contact Name Kyle Littrell | Contact Telephone 432-221-7331 |
| Contact email Kyle_Littrell@xtoenergy.com | Incident # (assigned by OCD) |
| Contact mailing address 522 W. Mermod, Carlsbad, NM 88220 | |

Location of Release Source

Latitude 32.122709 Longitude -103.806492
(NAD 83 in decimal degrees to 5 decimal places)

| | |
|----------------------------------------------|----------------------------------------------------------------|
| Site Name PLU Phantom Banks 20-25-31 Battery | Site Type Well Location |
| Date Release Discovered 11/16/2019 | API# (if applicable) 30-015-40764 (Poker Lake CVS JV PB #006H) |

| Unit Letter | Section | Township | Range | County |
|-------------|---------|----------|-------|--------|
| D | 20 | 25S | 31E | EDDY |

Surface Owner: State Federal Tribal Private (Name: _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

| | | |
|----------------------------------------------------|--------------------------------------------------------------------------------|----------------------------------------------------------|
| <input type="checkbox"/> Crude Oil | Volume Released (bbls) 0.0 | Volume Recovered (bbls) 0.0 |
| <input checked="" type="checkbox"/> Produced Water | Volume Released (bbls) 10.0 | Volume Recovered (bbls) 10.0 |
| | Is the concentration of dissolved chloride in the produced water >10,000 mg/l? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <input type="checkbox"/> Condensate | Volume Released (bbls) | Volume Recovered (bbls) |
| <input type="checkbox"/> Natural Gas | Volume Released (Mcf) | Volume Recovered (Mcf) |
| <input type="checkbox"/> Other (describe) | Volume/Weight Released (provide units) | Volume/Weight Recovered (provide units) |

Cause of Release: The seal on the South pump went out and released 10 bbls of produced water into containment, a vacuum truck recovered 10 bbls. A 48-hour advance notice of liner inspection was provided by email to NMOCD District 2. The liner visually inspected and inspector determined the liner has a hole, delineation for deferral will be conducted by a third party contractor.

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State of New Mexico
Oil Conservation Division

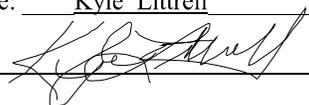
Page 2

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|----------------|--|
| Incident ID | |
| District RP | |
| Facility ID | |
| Application ID | |

| | |
|---------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | If YES, for what reason(s) does the responsible party consider this a major release? N/A |
| If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? N/A | |

Initial Response

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

| |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately. |
| If all the actions described above have <u>not</u> been undertaken, explain why: N/A |
| Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation. |
| 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: <u> Kyle Littrell </u> Title: <u> SH&E Supervisor </u> Signature: <u> </u> Date: <u> 11/25/2019 </u> email: <u> Kyle_Littrell@xtoenergy.com </u> Telephone: _____ |
| <u>OCD Only</u> Received by: _____ Date: _____ |

| | | | |
|------------------------------------------|-----------------------------------|---------|--|
| Location: | PLU Phantom Banks 20-25-31 | | |
| Spill Date: | 11/16/2019 | | |
| Approximate Area = | 170.12 | sq. ft. | |
| Average Saturation (or depth) of spill = | 3.96 | inches | |

| | | | |
|------------------------------|--------------|-------------|--|
| TOTAL VOLUME OF LEAK | | | |
| Total Treated Water = | 10.00 | bbls | |
| VOLUME RECOVERED | | | |
| Total Treated Water = | 10.00 | bbls | |

| | |
|----------------|--------------|
| Incident ID | |
| District RP | NOT ASSIGNED |
| 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? | _>100_ (ft bgs) |
| Did this release impact groundwater or surface water? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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)? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 1000 feet of any other fresh water well or spring? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 300 feet of a wetland? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release overlying a subsurface mine? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release overlying an unstable area such as karst geology? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within a 100-year floodplain? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Did the release impact areas not on an exploration, development, production, or storage site? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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.

| |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Characterization Report Checklist: <i>Each of the following items must be included in the report.</i></p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells. <input checked="" type="checkbox"/> Field data <input checked="" type="checkbox"/> Data table of soil contaminant concentration data <input checked="" type="checkbox"/> Depth to water determination <input checked="" type="checkbox"/> Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release <input checked="" type="checkbox"/> Boring or excavation logs <input checked="" type="checkbox"/> Photographs including date and GIS information <input checked="" type="checkbox"/> Topographic/Aerial maps <input checked="" type="checkbox"/> 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.

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Oil Conservation Division

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|----------------|--------------|
| Incident ID | |
| District RP | NOT ASSIGNED |
| Facility ID | |
| Application ID | |

Closure

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

Closure Report Attachment Checklist: *Each of the following items must be included in the closure report.*

- A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Kyle Littrell Title: SH&E Supervisor
Signature: , Date: 12/06/2019
email: Kyle.Littrell@xtoenergy.com Telephone: 432-221-7331

OCD Only

Received by: _____ Date: _____

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____



LT Environmental, Inc.

3300 North "A" Street
Building 1, Unit 222
Midland, Texas 79705
432.704.5178

December 6, 2019

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

**RE: Closure Request
Poker Lake Unit Phantom Banks 20-25-31 Battery
Remediation Permit Number 2RP-5629 and RP Not Assigned (PO Number LG0HR-191126-C-1410) NCE2002749344
Eddy County, New Mexico**

Dear Mr. Bratcher:

LT Environmental, Inc. (LTE), on behalf of XTO Energy, Inc. (XTO), presents the following report detailing site assessment and soil sampling activities at the Poker Lake Unit Phantom Banks 20-25-31 Battery (Site) in Unit D, Section 20, Township 25 South, Range 31 East, in Eddy County, New Mexico (Figure 1). The purpose of the site assessment and soil sampling activities was to confirm the presence or absence of impacts to soil following two separate releases of produced water at the Site. Based on field observations, field screening, and laboratory analytical results from soil sampling activities, XTO is submitting this Closure Report and requesting no further action for Remediation Permit (RP) Numbers 2RP-5629 and a subsequent second event that has yet to be assigned an RP Number. The Purchase Order (PO) Number for the initial Release Notification and Corrective Action Form C-141 (Form C-141) submitted to the New Mexico Oil Conservation Division (NMOCD) on November 25, 2019, for the second release event is LG0HR-191126-C-1410.

RELEASE BACKGROUND

On August 20, 2019, a seal on a produced water transfer pump failed, resulting in the release 10 barrels (bbls) of produced water into the lined tank battery containment. The pump was isolated until repairs could be made. A vacuum truck was dispatched to the Site to recover free-standing fluids; approximately 10 bbls of produced water was recovered. A liner integrity inspection was conducted. A 48-hour notification was provided to the NMOCD via email prior to the liner inspection. The liner was determined to have a hole. XTO reported the release to the NMOCD on a Form C-141 on September 4, 2019, and was assigned RP Number 2RP-5629 (Attachment 1). Based on the presence of active production equipment, XTO requested deferral of delineation and remediation on the C141. The NMOCD denied XTO's deferral request on November 8, 2019 and required XTO to obtain delineation soil samples beneath the liner.





Bratcher, M.
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On November 16, 2019, a seal on a pump failed, resulting in the release 10 barrels (bbls) of produced water into the same lined tank battery containment. A vacuum truck was dispatched to the Site to recover free-standing fluids; approximately 10 bbls of produced water was recovered. A liner integrity inspection was conducted. A 48-hour notification was provided to the NMOCD via email prior to the liner inspection, but the same liner hole was present. XTO reported the release to the NMOCD on a Form C-141 on November 25, 2019, and the RP number has not been assigned (Attachment 1). The PO Number for the initial Form C-141 submission for this release event is LG0HR-191126-C-1410.

SITE CHARACTERIZATION

LTE characterized the Site according to Table 1, *Closure Criteria for Soils Impacted by a Release*, of Title 19, Chapter 15, Part 29, Section 12 (19.15.29.12) of the New Mexico Administrative Code (NMAC). Depth to groundwater at the Site is estimated to be greater than 100 feet below ground surface (bgs) based on the nearest water well data. The closest permitted water well with depth to water data is United States Geological Survey (USGS) well 320643103465002, located approximately 1.58 miles southeast of the Site. The water well has a depth to groundwater of approximately 318 feet bgs and a total depth of 400 feet bgs. The closest continuously flowing water or significant watercourse to the Site is an intermittent dry wash, located approximately 3,823 feet southwest of the Site. The Site is greater than 200 feet from a lakebed, sinkhole, or playa lake and greater than 300 feet from an occupied residence, school, hospital, institution, church, or wetland. The Site is greater than 1,000 feet to a freshwater well or spring and is not within a 100-year floodplain or overlying a subsurface mine. The Site is located in a low potential karst area.

CLOSURE CRITERIA

Based on the results of the Site Characterization, the following NMOCD Table 1 Closure Criteria (Closure Criteria) apply:

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





Bratcher, M.
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SITE ASSESSMENT AND SOIL SAMPLING ACTIVITIES

On November 18, 2019, LTE evaluated the release extent based on information provided on the Form C-141s and visual observations. LTE personnel advanced a borehole via hand-auger at one location within the lined tank battery containment on the northern edge of the caliche well pad. Site assessment activities and vertical delineation soil sampling was completed at the location of the hole found during the liner integrity inspection conducted by XTO. Two soil samples were collected at depths of 1 foot and 2 feet bgs (BH01 and BH01A). No soil staining was observed during the site visit. Soil from the borehole was field screened for volatile aromatic hydrocarbons and chloride utilizing a calibrated photo-ionization detector (PID) and Hach® chloride QuanTab® test strips, respectively. Field screening results and observations for each sample were documented on a lithologic/soil sample log and are included as Attachment 2. The borehole was backfilled with the soil removed and XTO repaired the liner. The borehole and delineation soil sample locations are depicted on Figure 2.

The soil samples from were placed directly into pre-cleaned glass jars, labeled with the location, date, time, sampler name, method of analysis, and immediately placed on ice. The soil samples were shipped at or below 4 degrees Celsius (°C) under strict chain-of-custody (COC) procedures to Xenco Laboratories (Xenco) in Midland, Texas, for analysis of BTEX following United States Environmental Protection Agency (EPA) Method 8021B; TPH-GRO, TPH-DRO, and TPH-oil range organics (ORO) following USEPA Method 8015M/D; and chloride following EPA Method 300.0. Photographic documentation was conducted during the Site visit. Photographs are included in Attachment 3.

ANALYTICAL RESULTS

Laboratory analytical results indicated benzene, BTEX, GRO and DRO, TPH, and chloride concentrations were compliant with the Closure Criteria in soil samples BH01 and BH01A at depths of approximately 1 foot and 2 feet bgs, respectively. Laboratory analytical results are presented on Figure 2, and summarized in Table 1. The complete laboratory analytical reports are included as Attachment 4.

CONCLUSIONS

Delineation soil samples BH01 and BH01A collected from within the lined tank battery containment from depths of 1 foot and 2 feet bgs to assess for the presence or absence of soil impacts as a result of the August 20 and November 16, 2019, produced water releases. A vacuum truck recovered all free-standing fluid. Laboratory analytical results for the soil samples indicated benzene, BTEX, GRO and DRO, TPH, and chloride concentrations were compliant with the Closure Criteria. Additionally, field screening of soil indicated volatile aromatic hydrocarbons and chloride concentrations were not elevated and soil staining and petroleum hydrocarbon odors were not identified within the release extent.





Bratcher, M.
Page 4

Based on initial response efforts, absence of elevated field screening results, and soil sample laboratory analytical results compliant with the Closure Criteria, no impacted soil was identified beneath the liner and no soil was impacted as a result of the produced water releases. XTO requests no further action for RP Numbers 2RP-5629 and the subsequent November 16, 2019 release. Updated Form C-141s are included as Attachment 1.

If you have any questions or comments, please do not hesitate to contact Ashley Ager at (970) 385-1096.

Sincerely,

LT ENVIRONMENTAL, INC.

A handwritten signature in black ink, reading "Carol Ann Whaley".

Carol Ann Whaley
Staff Geologist

A handwritten signature in black ink, reading "Ashley L. Ager".

Ashley L. Ager, P.G.
Senior Geologist

cc: Kyle Littrell, XTO
United States Bureau of Land Management – New Mexico
Robert Hamlet, NMOCD
Victoria Venegas, NMOCD

Appendices:

- Figure 1 Site Location Map
- Figure 2 Delineation Soil Sample Locations
- Table 1 Soil Analytical Results
- Attachment 1 Initial/Final NMOCD Form C-141 (2RP-5629 and RP not assigned)
- Attachment 2 Lithologic / Soil Sampling Logs
- Attachment 3 Photographic Log
- Attachment 4 Laboratory Analytical Reports



FIGURES



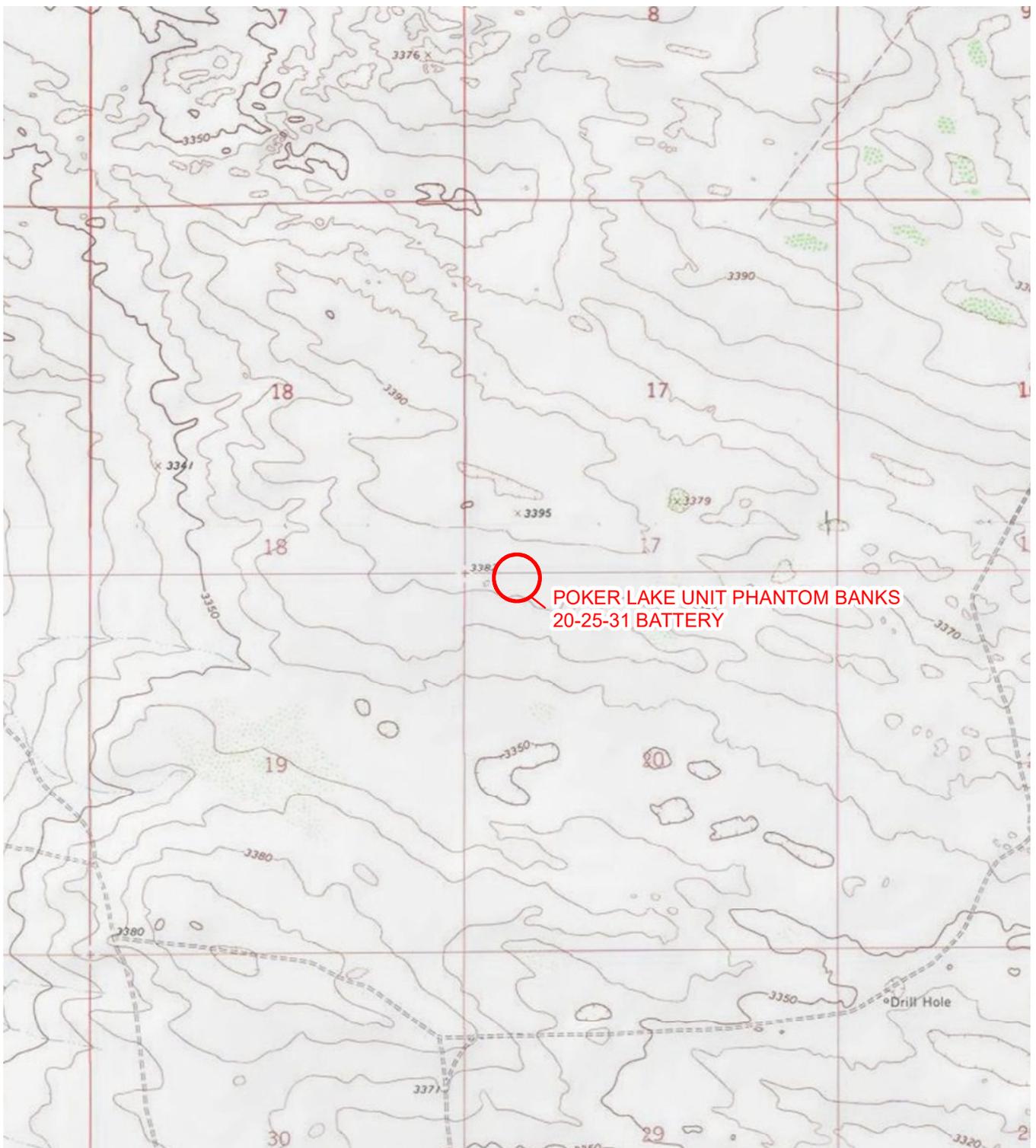
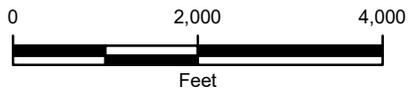


IMAGE COURTESY OF ESRI/USGS

LEGEND

○ SITE LOCATION



NOTE: REMEDIATION PERMIT NUMBER 2RP-5629 & RP NOT ASSIGNED

FIGURE 1
SITE LOCATION MAP
POKER LAKE UNIT PHANTOM
BANKS 20-25-31 BATTERY
UNIT D SEC 20 T25S R31E
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.



SAMPLE ID@DEPTH BELOW GROUND SURFACE (FEET)
 SAMPLE DATE
 NMOCD TABLE 1 CLOSURE CRITERIA (NMAC 19.15.29.12)
 B = 10 mg/kg
 BTEX = 50 mg/kg
 GRO+DRO = 1,000 mg/kg
 TPH = 2,500 mg/kg
 Cl = 20,000 mg/kg
 ALL RESULTS IN MILLIGRAMS PER KILOGRAM (mg/kg)
 <: INDICATES RESULT IS LESS THAN THE
 LABORATORY REPORTING LIMIT

BH01@1'
 11/18/2019
 B: <0.00200
 BTEX: <0.00200
 GRO+DRO: <50.2
 TPH: <50.2
 Cl: 257

BH01A@2'
 11/18/2019
 B: <0.00200
 BTEX: <0.00200
 GRO+DRO: <50.3
 TPH: <50.3
 Cl: 490

LEGEND

- X** RELEASE LOCATION
- DELINEATION SOIL SAMPLE IN COMPLIANCE WITH APPLICABLE CLOSURE CRITERIA

▭ RELEASE EXTENT

B: BENZENE
 BTEX: TOTAL BENZENE, TOLUENE, ETHYLBENZENE,
 AND TOTAL XYLENES
 GRO: GASOLINE RANGE ORGANICS
 DRO: DIESEL RANGE ORGANICS
 TPH: TOTAL PETROLEUM HYDROCARBONS
 Cl: CHLORIDE
 NMAC: NEW MEXICO ADMINISTRATIVE CODE
 NMOCD: NEW MEXICO OIL CONSERVATION DIVISION
 NOTE: REMEDIATION PERMIT NUMBER
 2RP-5629 & RP NOT ASSIGNED

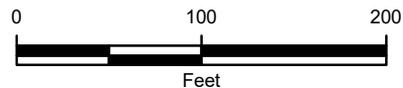


IMAGE COURTESY OF ESRI

FIGURE 2
 DELINEATION SOIL SAMPLE LOCATIONS
 POKER LAKE UNIT PHANTOM
 BANKS 20-25-31 BATTERY
 UNIT D SEC 20 T25S R31E
 EDDY COUNTY, NEW MEXICO
 XTO ENERGY, INC.



TABLE



**TABLE 1
SOIL ANALYTICAL RESULTS**

**POKER LAKE UNIT PHANTOM BANKS 20-25-31 BATTERY
REMEDIATION PERMIT NUMBERS 2RP-5629 & NOT ASSIGNED
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.**

| Sample Name | Sample Depth (feet bgs) | Sample Date | Benzene (mg/kg) | Toluene (mg/kg) | Ethyl-benzene (mg/kg) | Total Xylenes (mg/kg) | Total BTEX (mg/kg) | GRO (mg/kg) | DRO (mg/kg) | ORO (mg/kg) | Total GRO+DRO (mg/kg) | TPH (mg/kg) | Chloride (mg/kg) |
|---------------------------------------|-------------------------|-------------|-----------------|-----------------|-----------------------|-----------------------|--------------------|-------------|-------------|-------------|-----------------------|--------------|------------------|
| BH01 | 1 | 11/18/2019 | <0.00200 | <0.00200 | <0.00200 | <0.00200 | <0.00200 | <50.2 | <50.2 | <50.2 | <50.2 | <50.2 | 257 |
| BH01A | 2 | 11/18/2019 | <0.00200 | <0.00200 | <0.00200 | <0.00200 | <0.00200 | <50.3 | <50.3 | <50.3 | <50.3 | <50.3 | 490 |
| NMOCD Table 1 Closure Criteria | | | 10 | NE | NE | NE | 50 | NE | NE | NE | 1,000 | 2,500 | 20,000 |

Notes:

bgs - below ground surface

BTEX - benzene, toluene, ethylbenzene, and total xylenes

DRO - diesel range organics

GRO - gasoline range organics

mg/kg - milligrams per kilogram

MRO - motor oil range organics

NMAC - New Mexico Administrative Code

NMOCD - New Mexico Oil Conservation Division

NE - not established

TPH - total petroleum hydrocarbons

< - indicates result is below laboratory reporting limits

Table 1 - closure criteria for soils impacted by a release per NMAC 19.15.29 August 2018





ATTACHMENT 1: INITIAL/FINAL NMOCD FORM C-141 (2RP-5629 and RP NOT ASSIGNED)

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

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

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

| | |
|----------------|----------|
| Incident ID | 2RP-5629 |
| District RP | |
| Facility ID | |
| Application ID | |

Release Notification

Responsible Party

| | |
|-----------------------------------------------------------|--------------------------------|
| Responsible Party XTO Energy | OGRID 5380 |
| Contact Name Kyle Littrell | Contact Telephone 432-221-7331 |
| Contact email Kyle_Littrell@xtoenergy.com | Incident # (assigned by OCD) |
| Contact mailing address 522 W. Mermod, Carlsbad, NM 88220 | |

Location of Release Source

Latitude 32.123045 Longitude -103.806318
(NAD 83 in decimal degrees to 5 decimal places)

| | |
|--------------------------------------------------|-------------------------------------------------------------|
| Site Name PLU Phantom Banks 20-25-31 USA Battery | Site Type Bulk Storage and Separation Facility |
| Date Release Discovered 8/20/2019 | API# (if applicable) 30-015-40764 (Poker Lake CVX JV PB 6H) |

| Unit Letter | Section | Township | Range | County |
|-------------|---------|----------|-------|--------|
| D | 20 | 25S | 31E | Eddy |

Surface Owner: State Federal Tribal Private (Name: BLM)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

| | | |
|----------------------------------------------------|------------------------------------------------------------------------------------------|----------------------------------------------------------|
| <input type="checkbox"/> Crude Oil | Volume Released (bbls) | Volume Recovered (bbls) |
| <input checked="" type="checkbox"/> Produced Water | Volume Released (bbls) 10 | Volume Recovered (bbls) 10 |
| | Is the concentration of total dissolved solids (TDS) in the produced water >10,000 mg/l? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <input type="checkbox"/> Condensate | Volume Released (bbls) | Volume Recovered (bbls) |
| <input type="checkbox"/> Natural Gas | Volume Released (Mcf) | Volume Recovered (Mcf) |
| <input type="checkbox"/> Other (describe) | Volume/Weight Released (provide units) | Volume/Weight Recovered (provide units) |

Cause of Release
A seal on a produced water transfer pump leaked fluid into tank battery containment. The pump was isolated until it can be repaired. Vacuum truck returned all free fluid to tank. No fluids were seen outside/around containment area. A 48-hour advance notice of liner inspection was provided by email to NMOCD District 2. The liner was visually inspected and determined to be inadequate. Liner is scheduled for repair and returned to impervious condition. XTO requests deferral of potential impacts under liner until facility upgrades or is abandoned. It is XTO safety policy to restrict subsurface disturbance to within 3 ft of equipment. The containment is congested by lines, tanks, and equipment making it impossible to access for vertical delineation via heavy equipment or drill rig.

Form C-141

State of New Mexico
Oil Conservation Division

Page 2

| | |
|----------------|--|
| Incident ID | |
| District RP | |
| Facility ID | |
| Application ID | |

| | |
|---------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|
| Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | If YES, for what reason(s) does the responsible party consider this a major release? N/A |
| If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? N/A | |

Initial Response

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

| |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately. |
| If all the actions described above have <u>not</u> been undertaken, explain why: N/A |
| Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation. |
| 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: <u>Kyle Littrell</u> Title: <u>SH&E Supervisor</u> Signature: <u></u> Date: <u>9/4/2019</u> email: <u>Kyle_Littrell@xtoenergy.com</u> Telephone: <u>432-221-7331</u> |
| <u>OCD Only</u> Received by: _____ Date: _____ |

Form C-141

State of New Mexico
Oil Conservation Division

Page 3

| | |
|----------------|----------|
| Incident ID | |
| District RP | 2RP-5629 |
| 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? | _>100_ (ft bgs) |
| Did this release impact groundwater or surface water? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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)? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 1000 feet of any other fresh water well or spring? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 300 feet of a wetland? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release overlying a subsurface mine? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release overlying an unstable area such as karst geology? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within a 100-year floodplain? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Did the release impact areas not on an exploration, development, production, or storage site? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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.

| |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Characterization Report Checklist: <i>Each of the following items must be included in the report.</i></p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells. <input checked="" type="checkbox"/> Field data <input checked="" type="checkbox"/> Data table of soil contaminant concentration data <input checked="" type="checkbox"/> Depth to water determination <input checked="" type="checkbox"/> Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release <input checked="" type="checkbox"/> Boring or excavation logs <input checked="" type="checkbox"/> Photographs including date and GIS information <input checked="" type="checkbox"/> Topographic/Aerial maps <input checked="" type="checkbox"/> 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.

Form C-141

State of New Mexico
Oil Conservation Division

Page 6

| | |
|----------------|----------|
| Incident ID | |
| District RP | 2RP-5629 |
| Facility ID | |
| Application ID | |

Closure

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

Closure Report Attachment Checklist: *Each of the following items must be included in the closure report.*

- A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Kyle Littrell Title: SH&E Supervisor
Signature: , Date: 12/06/2019
email: Kyle.Littrell@xtoenergy.com Telephone: 432-221-7331

OCD Only

Received by: _____ Date: _____

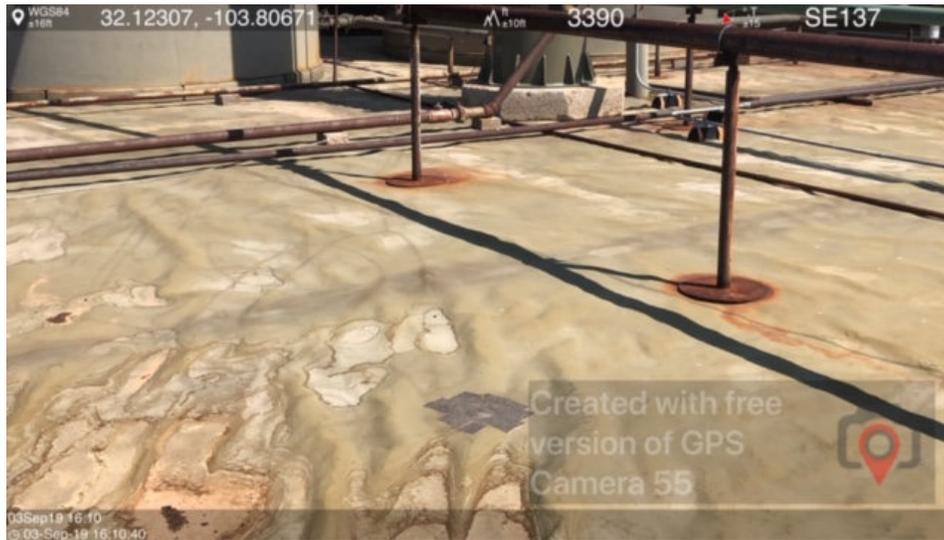
Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____

PLU Phantom Banks 20-25-31 USA Battery (30-015-40764 Poker Lake CVX JV PB
6H)

Spill Date: 8/20/2019



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

| | |
|-----------------------|--|
| <u>Incident ID</u> | |
| <u>District RP</u> | |
| <u>Facility ID</u> | |
| <u>Application ID</u> | |

Release Notification

Responsible Party

| | |
|-----------------------------------------------------------|--------------------------------|
| Responsible Party XTO Energy | OGRID 5380 |
| Contact Name Kyle Littrell | Contact Telephone 432-221-7331 |
| Contact email Kyle_Littrell@xtoenergy.com | Incident # (assigned by OCD) |
| Contact mailing address 522 W. Mermod, Carlsbad, NM 88220 | |

Location of Release Source

Latitude 32.122709 Longitude -103.806492
(NAD 83 in decimal degrees to 5 decimal places)

| | |
|----------------------------------------------|----------------------------------------------------------------|
| Site Name PLU Phantom Banks 20-25-31 Battery | Site Type Well Location |
| Date Release Discovered 11/16/2019 | API# (if applicable) 30-015-40764 (Poker Lake CVS JV PB #006H) |

| Unit Letter | Section | Township | Range | County |
|-------------|---------|----------|-------|--------|
| D | 20 | 25S | 31E | EDDY |

Surface Owner: State Federal Tribal Private (Name: _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

| | | |
|----------------------------------------------------|--------------------------------------------------------------------------------|----------------------------------------------------------|
| <input type="checkbox"/> Crude Oil | Volume Released (bbls) 0.0 | Volume Recovered (bbls) 0.0 |
| <input checked="" type="checkbox"/> Produced Water | Volume Released (bbls) 10.0 | Volume Recovered (bbls) 10.0 |
| | Is the concentration of dissolved chloride in the produced water >10,000 mg/l? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <input type="checkbox"/> Condensate | Volume Released (bbls) | Volume Recovered (bbls) |
| <input type="checkbox"/> Natural Gas | Volume Released (Mcf) | Volume Recovered (Mcf) |
| <input type="checkbox"/> Other (describe) | Volume/Weight Released (provide units) | Volume/Weight Recovered (provide units) |

Cause of Release: The seal on the South pump went out and released 10 bbls of produced water into containment, a vacuum truck recovered 10 bbls. A 48-hour advance notice of liner inspection was provided by email to NMOCD District 2. The liner visually inspected and inspector determined the liner has a hole, delineation for deferral will be conducted by a third party contractor.

Form C-141

State of New Mexico
Oil Conservation Division

Page 2

| | |
|----------------|--|
| Incident ID | |
| District RP | |
| Facility ID | |
| Application ID | |

| | |
|---------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | If YES, for what reason(s) does the responsible party consider this a major release? N/A |
| If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? N/A | |

Initial Response

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

| |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately. |
| If all the actions described above have <u>not</u> been undertaken, explain why: N/A |
| Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation. |
| 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: <u>Kyle Littrell</u> Title: <u>SH&E Supervisor</u> Signature:  Date: <u>11/25/2019</u> email: <u>Kyle_Littrell@xtoenergy.com</u> Telephone: _____ |
| <u>OCD Only</u> Received by: _____ Date: _____ |

| | | | |
|------------------------------------------|-----------------------------------|---------|--|
| Location: | PLU Phantom Banks 20-25-31 | | |
| Spill Date: | 11/16/2019 | | |
| Approximate Area = | 170.12 | sq. ft. | |
| Average Saturation (or depth) of spill = | 3.96 | inches | |

| | | | |
|------------------------------|--------------|-------------|--|
| TOTAL VOLUME OF LEAK | | | |
| Total Treated Water = | 10.00 | bbls | |
| VOLUME RECOVERED | | | |
| Total Treated Water = | 10.00 | bbls | |

| | |
|----------------|--------------|
| Incident ID | |
| District RP | NOT ASSIGNED |
| 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? | _>100_ (ft bgs) |
| Did this release impact groundwater or surface water? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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)? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 1000 feet of any other fresh water well or spring? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within 300 feet of a wetland? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release overlying a subsurface mine? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release overlying an unstable area such as karst geology? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Are the lateral extents of the release within a 100-year floodplain? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Did the release impact areas not on an exploration, development, production, or storage site? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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.

| |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Characterization Report Checklist: <i>Each of the following items must be included in the report.</i></p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells. <input checked="" type="checkbox"/> Field data <input checked="" type="checkbox"/> Data table of soil contaminant concentration data <input checked="" type="checkbox"/> Depth to water determination <input checked="" type="checkbox"/> Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release <input checked="" type="checkbox"/> Boring or excavation logs <input checked="" type="checkbox"/> Photographs including date and GIS information <input checked="" type="checkbox"/> Topographic/Aerial maps <input checked="" type="checkbox"/> 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.

Form C-141

State of New Mexico
Oil Conservation Division

Page 6

| | |
|----------------|--------------|
| Incident ID | |
| District RP | NOT ASSIGNED |
| Facility ID | |
| Application ID | |

Closure

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

Closure Report Attachment Checklist: *Each of the following items must be included in the closure report.*

- A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Kyle Littrell Title: SH&E Supervisor
Signature: , Date: 12/06/2019
email: Kyle.Littrell@xtoenergy.com Telephone: 432-221-7331

OCD Only

Received by: _____ Date: _____

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____

ATTACHMENT 2: LITHOLOGIC / SOIL SAMPLING LOGS





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

Identifier: **BH01**
 Project Name: **PLU Phantom Banks 20-25-31**

Date: **11/18/19**
 RP Number:
 Method: **Hand Auger**
 Total Depth: **28'**

LITHOLOGIC / SOIL SAMPLING LOG

Lat/Long: _____ Field Screening: _____

Logged By: **Ellie**
 Hole Diameter: _____

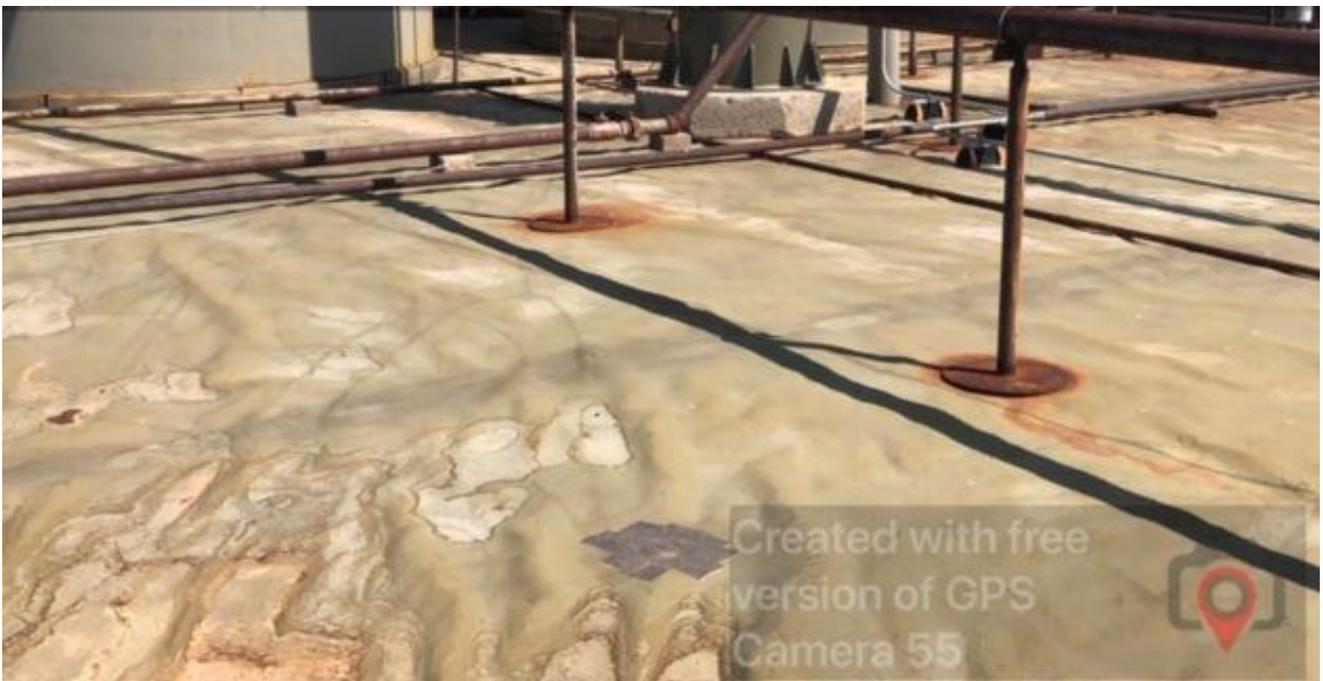
Comments:

1035
1057

| Moisture Content | Chloride (ppm) | Vapor (ppm) | Staining | Sample # | Depth (ft. bgs.) | Sample Depth | Soil/Rock Type | Lithology/Remarks |
|------------------|----------------|-------------|----------|----------|------------------|--------------|----------------|-------------------------------------------|
| | | | | | 0 | | | |
| D | 243 | 6.7 | N | | 18' | | S | light brown, calciche to coarse sand ↓ |
| D | 534 | 0.0 | N | | 28' | | S | |
| | | | | | 4 | | | |
| | | | | | 6 | | | |
| | | | | | 8 | | | |
| | | | | | 10 | | | |
| | | | | | 12 | | | |
| | | | | | 14 | | | |
| | | | | | 16 | | | |
| | | | | | 18 | | | |
| | | | | | 20 | | | |
| | | | | | 22 | | | |
| | | | | | 24 | | | |

ATTACHMENT 3: PHOTOGRAPHIC LOG





Southeastern view of lined tank battery containment and liner hole during soil sampling activities.

| | | |
|--------------------|--------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|
| Project: 012919270 | XTO Energy, Inc. Poker Lake Unit Phantom Banks 20-25-31 Battery |  <i>Advancing Opportunity</i> |
| November 18, 2019 | Photographic Log | |



Southeastern view of lined tank battery containment and liner hole during soil sampling activities.

| | | |
|--------------------|--------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|
| Project: 012919270 | XTO Energy, Inc. Poker Lake Unit Phantom Banks 20-25-31 Battery |  <i>Advancing Opportunity</i> |
| November 18, 2019 | Photographic Log | |

ATTACHMENT 4: LABORATORY ANALYTICAL REPORTS



Analytical Report 643717

for
LT Environmental, Inc.

Project Manager: Dan Moir

PLU Phantom Banks

012919270

26-NOV-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 (2019-058), North Carolina (681), Arkansas (19-037-0)

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-Carlsbad (LELAP): Louisiana (05092)
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)



26-NOV-19

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

Reference: XENCO Report No(s): **643717**
PLU Phantom Banks
Project Address: 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) 643717. 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. 643717 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,

A handwritten signature in black ink that reads 'Jessica Kramer'. The signature is written in a cursive, slightly slanted style.

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 643717

LT Environmental, Inc., Arvada, CO

PLU Phantom Banks

| Sample Id | Matrix | Date Collected | Sample Depth | Lab Sample Id |
|-----------|--------|----------------|--------------|---------------|
| SS01A | S | 11-18-19 10:35 | 1 ft | 643717-001 |
| BH01A | S | 11-18-19 10:55 | 2 ft | 643717-002 |



CASE NARRATIVE

Client Name: LT Environmental, Inc.

Project Name: PLU Phantom Banks

Project ID: 012919270
Work Order Number(s): 643717

Report Date: 26-NOV-19
Date Received: 11/19/2019

Sample receipt non conformances and comments:

Corrected sample names per client email. See below. NEW VERSION GENERATED. JK 11/26/19

SS01 --> SS01A

BH01 --> BH01A

Sample receipt non conformances and comments per sample:

None

Analytical non conformances and comments:

Batch: LBA-3108004 BTEX by EPA 8021B

Soil samples were not received in Terracore kits and therefore were prepared by method 5030.



Certificate of Analysis Summary 643717

LT Environmental, Inc., Arvada, CO

Project Name: PLU Phantom Banks

Project Id: 012919270
Contact: Dan Moir
Project Location: Eddy County

Date Received in Lab: Tue Nov-19-19 03:15 pm
Report Date: 26-NOV-19
Project Manager: Jessica Kramer

| <i>Analysis Requested</i> | <i>Lab Id:</i> | 643717-001 | 643717-002 | | | | |
|------------------------------------|-------------------|------------------|------------------|--|--|--|--|
| | <i>Field Id:</i> | SS01A | BH01A | | | | |
| | <i>Depth:</i> | 1- ft | 2- ft | | | | |
| | <i>Matrix:</i> | SOIL | SOIL | | | | |
| | <i>Sampled:</i> | Nov-18-19 10:35 | Nov-18-19 10:55 | | | | |
| BTEX by EPA 8021B | <i>Extracted:</i> | Nov-19-19 17:11 | Nov-19-19 17:11 | | | | |
| | <i>Analyzed:</i> | Nov-19-19 23:58 | Nov-20-19 00:17 | | | | |
| | <i>Units/RL:</i> | mg/kg RL | mg/kg RL | | | | |
| Benzene | | <0.00200 0.00200 | <0.00200 0.00200 | | | | |
| Toluene | | <0.00200 0.00200 | <0.00200 0.00200 | | | | |
| Ethylbenzene | | <0.00200 0.00200 | <0.00200 0.00200 | | | | |
| m,p-Xylenes | | <0.00200 0.00200 | <0.00200 0.00200 | | | | |
| o-Xylene | | <0.00200 0.00200 | <0.00200 0.00200 | | | | |
| Total Xylenes | | <0.00200 0.00200 | <0.00200 0.00200 | | | | |
| Total BTEX | | <0.00200 0.00200 | <0.00200 0.00200 | | | | |
| Chloride by EPA 300 | <i>Extracted:</i> | Nov-19-19 18:11 | Nov-19-19 18:11 | | | | |
| | <i>Analyzed:</i> | Nov-19-19 19:52 | Nov-19-19 20:10 | | | | |
| | <i>Units/RL:</i> | mg/kg RL | mg/kg RL | | | | |
| Chloride | | 257 9.92 | 490 9.88 | | | | |
| TPH by SW8015 Mod | <i>Extracted:</i> | Nov-19-19 16:30 | Nov-19-19 16:30 | | | | |
| | <i>Analyzed:</i> | Nov-20-19 00:30 | Nov-20-19 00:50 | | | | |
| | <i>Units/RL:</i> | mg/kg RL | mg/kg RL | | | | |
| Gasoline Range Hydrocarbons (GRO) | | <50.2 50.2 | <50.3 50.3 | | | | |
| Diesel Range Organics (DRO) | | <50.2 50.2 | <50.3 50.3 | | | | |
| Motor Oil Range Hydrocarbons (MRO) | | <50.2 50.2 | <50.3 50.3 | | | | |
| Total GRO-DRO | | <50.2 50.2 | <50.3 50.3 | | | | |
| Total TPH | | <50.2 50.2 | <50.3 50.3 | | | | |

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

Version: 1.0%

Jessica Kramer
Project Assistant



Certificate of Analytical Results 643717

LT Environmental, Inc., Arvada, CO

PLU Phantom Banks

| | | |
|----------------------------------------|--------------------------------|-------------------------------|
| Sample Id: SS01A | Matrix: Soil | Date Received: 11.19.19 15.15 |
| Lab Sample Id: 643717-001 | Date Collected: 11.18.19 10.35 | Sample Depth: 1 ft |
| Analytical Method: Chloride by EPA 300 | | Prep Method: E300P |
| Tech: MAB | | % Moisture: |
| Analyst: MAB | Date Prep: 11.19.19 18.11 | Basis: Wet Weight |
| Seq Number: 3108003 | | |

| Parameter | Cas Number | Result | RL | Units | Analysis Date | Flag | Dil |
|-----------|------------|--------|------|-------|----------------|------|-----|
| Chloride | 16887-00-6 | 257 | 9.92 | mg/kg | 11.19.19 19.52 | | 1 |

| | | |
|--------------------------------------|---------------------------|----------------------|
| Analytical Method: TPH by SW8015 Mod | | Prep Method: SW8015P |
| Tech: DTH | | % Moisture: |
| Analyst: DTH | Date Prep: 11.19.19 16.30 | Basis: Wet Weight |
| Seq Number: 3108033 | | |

| Parameter | Cas Number | Result | RL | Units | Analysis Date | Flag | Dil |
|------------------------------------|------------|--------|------|-------|----------------|------|-----|
| Gasoline Range Hydrocarbons (GRO) | PHC610 | <50.2 | 50.2 | mg/kg | 11.20.19 00.30 | U | 1 |
| Diesel Range Organics (DRO) | C10C28DRO | <50.2 | 50.2 | mg/kg | 11.20.19 00.30 | U | 1 |
| Motor Oil Range Hydrocarbons (MRO) | PHCG2835 | <50.2 | 50.2 | mg/kg | 11.20.19 00.30 | U | 1 |
| Total GRO-DRO | PHC628 | <50.2 | 50.2 | mg/kg | 11.20.19 00.30 | U | 1 |
| Total TPH | PHC635 | <50.2 | 50.2 | mg/kg | 11.20.19 00.30 | U | 1 |

| Surrogate | Cas Number | % Recovery | Units | Limits | Analysis Date | Flag |
|----------------|------------|------------|-------|--------|----------------|------|
| 1-Chlorooctane | 111-85-3 | 71 | % | 70-135 | 11.20.19 00.30 | |
| o-Terphenyl | 84-15-1 | 77 | % | 70-135 | 11.20.19 00.30 | |



Certificate of Analytical Results 643717

LT Environmental, Inc., Arvada, CO

PLU Phantom Banks

| | | |
|--------------------------------------|--------------------------------|-------------------------------|
| Sample Id: SS01A | Matrix: Soil | Date Received: 11.19.19 15.15 |
| Lab Sample Id: 643717-001 | Date Collected: 11.18.19 10.35 | Sample Depth: 1 ft |
| Analytical Method: BTEX by EPA 8021B | | Prep Method: SW5030B |
| Tech: MAB | | % Moisture: |
| Analyst: MAB | Date Prep: 11.19.19 17.11 | Basis: Wet Weight |
| Seq Number: 3108004 | | |

| Parameter | Cas Number | Result | RL | Units | Analysis Date | Flag | Dil |
|----------------------|-------------------|-------------------|--------------|---------------|----------------------|-------------|-----|
| Benzene | 71-43-2 | <0.00200 | 0.00200 | mg/kg | 11.19.19 23.58 | U | 1 |
| Toluene | 108-88-3 | <0.00200 | 0.00200 | mg/kg | 11.19.19 23.58 | U | 1 |
| Ethylbenzene | 100-41-4 | <0.00200 | 0.00200 | mg/kg | 11.19.19 23.58 | U | 1 |
| m,p-Xylenes | 179601-23-1 | <0.00200 | 0.00200 | mg/kg | 11.19.19 23.58 | U | 1 |
| o-Xylene | 95-47-6 | <0.00200 | 0.00200 | mg/kg | 11.19.19 23.58 | U | 1 |
| Total Xylenes | 1330-20-7 | <0.00200 | 0.00200 | mg/kg | 11.19.19 23.58 | U | 1 |
| Total BTEX | | <0.00200 | 0.00200 | mg/kg | 11.19.19 23.58 | U | 1 |
| Surrogate | Cas Number | % Recovery | Units | Limits | Analysis Date | Flag | |
| 4-Bromofluorobenzene | 460-00-4 | 125 | % | 70-130 | 11.19.19 23.58 | | |
| 1,4-Difluorobenzene | 540-36-3 | 104 | % | 70-130 | 11.19.19 23.58 | | |



Certificate of Analytical Results 643717

LT Environmental, Inc., Arvada, CO

PLU Phantom Banks

| | | |
|----------------------------------------|--------------------------------|-------------------------------|
| Sample Id: BH01A | Matrix: Soil | Date Received: 11.19.19 15.15 |
| Lab Sample Id: 643717-002 | Date Collected: 11.18.19 10.55 | Sample Depth: 2 ft |
| Analytical Method: Chloride by EPA 300 | | Prep Method: E300P |
| Tech: MAB | | % Moisture: |
| Analyst: MAB | Date Prep: 11.19.19 18.11 | Basis: Wet Weight |
| Seq Number: 3108003 | | |

| Parameter | Cas Number | Result | RL | Units | Analysis Date | Flag | Dil |
|-----------|------------|--------|------|-------|----------------|------|-----|
| Chloride | 16887-00-6 | 490 | 9.88 | mg/kg | 11.19.19 20.10 | | 1 |

| | | |
|--------------------------------------|---------------------------|----------------------|
| Analytical Method: TPH by SW8015 Mod | | Prep Method: SW8015P |
| Tech: DTH | | % Moisture: |
| Analyst: DTH | Date Prep: 11.19.19 16.30 | Basis: Wet Weight |
| Seq Number: 3108033 | | |

| Parameter | Cas Number | Result | RL | Units | Analysis Date | Flag | Dil |
|------------------------------------|------------|--------|------|-------|----------------|------|-----|
| Gasoline Range Hydrocarbons (GRO) | PHC610 | <50.3 | 50.3 | mg/kg | 11.20.19 00.50 | U | 1 |
| Diesel Range Organics (DRO) | C10C28DRO | <50.3 | 50.3 | mg/kg | 11.20.19 00.50 | U | 1 |
| Motor Oil Range Hydrocarbons (MRO) | PHCG2835 | <50.3 | 50.3 | mg/kg | 11.20.19 00.50 | U | 1 |
| Total GRO-DRO | PHC628 | <50.3 | 50.3 | mg/kg | 11.20.19 00.50 | U | 1 |
| Total TPH | PHC635 | <50.3 | 50.3 | mg/kg | 11.20.19 00.50 | U | 1 |

| Surrogate | Cas Number | % Recovery | Units | Limits | Analysis Date | Flag |
|----------------|------------|------------|-------|--------|----------------|------|
| 1-Chlorooctane | 111-85-3 | 90 | % | 70-135 | 11.20.19 00.50 | |
| o-Terphenyl | 84-15-1 | 84 | % | 70-135 | 11.20.19 00.50 | |



Certificate of Analytical Results 643717

LT Environmental, Inc., Arvada, CO

PLU Phantom Banks

| | | |
|--------------------------------------|--------------------------------|-------------------------------|
| Sample Id: BH01A | Matrix: Soil | Date Received: 11.19.19 15.15 |
| Lab Sample Id: 643717-002 | Date Collected: 11.18.19 10.55 | Sample Depth: 2 ft |
| Analytical Method: BTEX by EPA 8021B | | Prep Method: SW5030B |
| Tech: MAB | | % Moisture: |
| Analyst: MAB | Date Prep: 11.19.19 17.11 | Basis: Wet Weight |
| Seq Number: 3108004 | | |

| Parameter | Cas Number | Result | RL | Units | Analysis Date | Flag | Dil |
|----------------------|-------------------|-------------------|--------------|---------------|----------------------|-------------|-----|
| Benzene | 71-43-2 | <0.00200 | 0.00200 | mg/kg | 11.20.19 00.17 | U | 1 |
| Toluene | 108-88-3 | <0.00200 | 0.00200 | mg/kg | 11.20.19 00.17 | U | 1 |
| Ethylbenzene | 100-41-4 | <0.00200 | 0.00200 | mg/kg | 11.20.19 00.17 | U | 1 |
| m,p-Xylenes | 179601-23-1 | <0.00200 | 0.00200 | mg/kg | 11.20.19 00.17 | U | 1 |
| o-Xylene | 95-47-6 | <0.00200 | 0.00200 | mg/kg | 11.20.19 00.17 | U | 1 |
| Total Xylenes | 1330-20-7 | <0.00200 | 0.00200 | mg/kg | 11.20.19 00.17 | U | 1 |
| Total BTEX | | <0.00200 | 0.00200 | mg/kg | 11.20.19 00.17 | U | 1 |
| Surrogate | Cas Number | % Recovery | Units | Limits | Analysis Date | Flag | |
| 4-Bromofluorobenzene | 460-00-4 | 121 | % | 70-130 | 11.20.19 00.17 | | |
| 1,4-Difluorobenzene | 540-36-3 | 104 | % | 70-130 | 11.20.19 00.17 | | |



QC Summary 643717

LT Environmental, Inc.
PLU Phantom Banks

Analytical Method: Chloride by EPA 300

Seq Number: 3108003
MB Sample Id: 7690696-1-BLK

Matrix: Solid
LCS Sample Id: 7690696-1-BKS

Prep Method: E300P
Date Prep: 11.19.19
LCSD Sample Id: 7690696-1-BSD

| Parameter | MB Result | Spike Amount | LCS Result | LCS %Rec | LCSD Result | LCSD %Rec | Limits | %RPD | RPD Limit | Units | Analysis Date | Flag |
|-----------|-----------|--------------|------------|----------|-------------|-----------|--------|------|-----------|-------|----------------|------|
| Chloride | <10.0 | 250 | 254 | 102 | 253 | 101 | 90-110 | 0 | 20 | mg/kg | 11.19.19 17:55 | |

Analytical Method: Chloride by EPA 300

Seq Number: 3108003
Parent Sample Id: 643713-001

Matrix: Soil
MS Sample Id: 643713-001 S

Prep Method: E300P
Date Prep: 11.19.19
MSD Sample Id: 643713-001 SD

| Parameter | Parent Result | Spike Amount | MS Result | MS %Rec | MSD Result | MSD %Rec | Limits | %RPD | RPD Limit | Units | Analysis Date | Flag |
|-----------|---------------|--------------|-----------|---------|------------|----------|--------|------|-----------|-------|----------------|------|
| Chloride | 300 | 198 | 508 | 105 | 509 | 106 | 90-110 | 0 | 20 | mg/kg | 11.19.19 18:12 | |

Analytical Method: Chloride by EPA 300

Seq Number: 3108003
Parent Sample Id: 643716-001

Matrix: Soil
MS Sample Id: 643716-001 S

Prep Method: E300P
Date Prep: 11.19.19
MSD Sample Id: 643716-001 SD

| Parameter | Parent Result | Spike Amount | MS Result | MS %Rec | MSD Result | MSD %Rec | Limits | %RPD | RPD Limit | Units | Analysis Date | Flag |
|-----------|---------------|--------------|-----------|---------|------------|----------|--------|------|-----------|-------|----------------|------|
| Chloride | 1080 | 200 | 1270 | 95 | 1280 | 101 | 90-110 | 1 | 20 | mg/kg | 11.19.19 19:35 | |

Analytical Method: TPH by SW8015 Mod

Seq Number: 3108033
MB Sample Id: 7690720-1-BLK

Matrix: Solid
LCS Sample Id: 7690720-1-BKS

Prep Method: SW8015P
Date Prep: 11.19.19
LCSD Sample Id: 7690720-1-BSD

| Parameter | MB Result | Spike Amount | LCS Result | LCS %Rec | LCSD Result | LCSD %Rec | Limits | %RPD | RPD Limit | Units | Analysis Date | Flag |
|-----------------------------------|-----------|--------------|------------|----------|-------------|-----------|--------|------|-----------|-------|----------------|------|
| Gasoline Range Hydrocarbons (GRO) | <50.0 | 1000 | 1140 | 114 | 1090 | 109 | 70-135 | 4 | 35 | mg/kg | 11.19.19 11:27 | |
| Diesel Range Organics (DRO) | <50.0 | 1000 | 1160 | 116 | 1250 | 125 | 70-135 | 7 | 35 | mg/kg | 11.19.19 11:27 | |

| Surrogate | MB %Rec | MB Flag | LCS %Rec | LCS Flag | LCSD %Rec | LCSD Flag | Limits | Units | Analysis Date |
|----------------|---------|---------|----------|----------|-----------|-----------|--------|-------|----------------|
| 1-Chlorooctane | 120 | | 132 | | 129 | | 70-135 | % | 11.19.19 11:27 |
| o-Terphenyl | 118 | | 132 | | 129 | | 70-135 | % | 11.19.19 11:27 |

Analytical Method: TPH by SW8015 Mod

Seq Number: 3108033

Matrix: Solid
MB Sample Id: 7690720-1-BLK

Prep Method: SW8015P
Date Prep: 11.19.19

| Parameter | MB Result | Units | Analysis Date | Flag |
|------------------------------------|-----------|-------|----------------|------|
| Motor Oil Range Hydrocarbons (MRO) | <50.0 | mg/kg | 11.19.19 11:07 | |

MS/MSD Percent Recovery
Relative Percent Difference
LCS/LCSD Recovery
Log Difference

$[D] = 100 * (C-A) / B$
 $RPD = 200 * |(C-E) / (C+E)|$
 $[D] = 100 * (C) / [B]$
 Log Diff. = Log(Sample Duplicate) - Log(Original Sample)

LCS = Laboratory Control Sample
A = Parent Result
C = MS/LCS Result
E = MSD/LCSD Result

MS = Matrix Spike
B = Spike Added
D = MSD/LCSD % Rec



QC Summary 643717

LT Environmental, Inc. PLU Phantom Banks

Analytical Method: TPH by SW8015 Mod

Seq Number: 3108033

Parent Sample Id: 643713-001

Matrix: Soil

MS Sample Id: 643713-001 S

Prep Method: SW8015P

Date Prep: 11.19.19

MSD Sample Id: 643713-001 SD

| Parameter | Parent Result | Spike Amount | MS Result | MS %Rec | MSD Result | MSD %Rec | Limits | %RPD | RPD Limit | Units | Analysis Date | Flag |
|-----------------------------------|---------------|--------------|-----------|---------|------------|----------|--------|------|-----------|-------|----------------|------|
| Gasoline Range Hydrocarbons (GRO) | <50.1 | 1000 | 937 | 94 | 863 | 86 | 70-135 | 8 | 35 | mg/kg | 11.19.19 17:52 | |
| Diesel Range Organics (DRO) | <50.1 | 1000 | 1090 | 109 | 992 | 99 | 70-135 | 9 | 35 | mg/kg | 11.19.19 17:52 | |

| Surrogate | MS %Rec | MS Flag | MSD %Rec | MSD Flag | Limits | Units | Analysis Date |
|----------------|---------|---------|----------|----------|--------|-------|----------------|
| 1-Chlorooctane | 119 | | 110 | | 70-135 | % | 11.19.19 17:52 |
| o-Terphenyl | 120 | | 111 | | 70-135 | % | 11.19.19 17:52 |

Analytical Method: BTEX by EPA 8021B

Seq Number: 3108004

MB Sample Id: 7690695-1-BLK

Matrix: Solid

LCS Sample Id: 7690695-1-BKS

Prep Method: SW5030B

Date Prep: 11.19.19

LCSD Sample Id: 7690695-1-BSD

| Parameter | MB Result | Spike Amount | LCS Result | LCS %Rec | LCSD Result | LCSD %Rec | Limits | %RPD | RPD Limit | Units | Analysis Date | Flag |
|--------------|-----------|--------------|------------|----------|-------------|-----------|--------|------|-----------|-------|----------------|------|
| Benzene | <0.00200 | 0.100 | 0.103 | 103 | 0.101 | 101 | 70-130 | 2 | 35 | mg/kg | 11.19.19 15:03 | |
| Toluene | <0.00200 | 0.100 | 0.101 | 101 | 0.100 | 100 | 70-130 | 1 | 35 | mg/kg | 11.19.19 15:03 | |
| Ethylbenzene | <0.00200 | 0.100 | 0.101 | 101 | 0.0996 | 100 | 71-129 | 1 | 35 | mg/kg | 11.19.19 15:03 | |
| m,p-Xylenes | <0.00200 | 0.200 | 0.213 | 107 | 0.211 | 106 | 70-135 | 1 | 35 | mg/kg | 11.19.19 15:03 | |
| o-Xylene | <0.00200 | 0.100 | 0.106 | 106 | 0.105 | 105 | 71-133 | 1 | 35 | mg/kg | 11.19.19 15:03 | |

| Surrogate | MB %Rec | MB Flag | LCS %Rec | LCS Flag | LCSD %Rec | LCSD Flag | Limits | Units | Analysis Date |
|----------------------|---------|---------|----------|----------|-----------|-----------|--------|-------|----------------|
| 1,4-Difluorobenzene | 102 | | 104 | | 103 | | 70-130 | % | 11.19.19 15:03 |
| 4-Bromofluorobenzene | 104 | | 111 | | 110 | | 70-130 | % | 11.19.19 15:03 |

Analytical Method: BTEX by EPA 8021B

Seq Number: 3108004

Parent Sample Id: 643713-001

Matrix: Soil

MS Sample Id: 643713-001 S

Prep Method: SW5030B

Date Prep: 11.19.19

MSD Sample Id: 643713-001 SD

| Parameter | Parent Result | Spike Amount | MS Result | MS %Rec | MSD Result | MSD %Rec | Limits | %RPD | RPD Limit | Units | Analysis Date | Flag |
|--------------|---------------|--------------|-----------|---------|------------|----------|--------|------|-----------|-------|----------------|------|
| Benzene | <0.00198 | 0.0992 | 0.103 | 104 | 0.0909 | 91 | 70-130 | 12 | 35 | mg/kg | 11.19.19 18:19 | |
| Toluene | <0.00198 | 0.0992 | 0.101 | 102 | 0.0849 | 85 | 70-130 | 17 | 35 | mg/kg | 11.19.19 18:19 | |
| Ethylbenzene | <0.00198 | 0.0992 | 0.0989 | 100 | 0.0758 | 76 | 71-129 | 26 | 35 | mg/kg | 11.19.19 18:19 | |
| m,p-Xylenes | <0.00198 | 0.198 | 0.209 | 106 | 0.159 | 80 | 70-135 | 27 | 35 | mg/kg | 11.19.19 18:19 | |
| o-Xylene | <0.00198 | 0.0992 | 0.105 | 106 | 0.0807 | 81 | 71-133 | 26 | 35 | mg/kg | 11.19.19 18:19 | |

| Surrogate | MS %Rec | MS Flag | MSD %Rec | MSD Flag | Limits | Units | Analysis Date |
|----------------------|---------|---------|----------|----------|--------|-------|----------------|
| 1,4-Difluorobenzene | 106 | | 106 | | 70-130 | % | 11.19.19 18:19 |
| 4-Bromofluorobenzene | 116 | | 118 | | 70-130 | % | 11.19.19 18:19 |

MS/MSD Percent Recovery
Relative Percent Difference
LCS/LCSD Recovery
Log Difference

[D] = 100*(C-A) / B
RPD = 200* | (C-E) / (C+E) |
[D] = 100 * (C) / [B]
Log Diff. = Log(Sample Duplicate) - Log(Original Sample)

LCS = Laboratory Control Sample
A = Parent Result
C = MS/LCS Result
E = MSD/LCSD Result

MS = Matrix Spike
B = Spike Added
D = MSD/LCSD % Rec



XENCO Laboratories

Prelogin/Nonconformance Report- Sample Log-In

Client: LT Environmental, Inc.

Date/ Time Received: 11/19/2019 03:15:00 PM

Work Order #: 643717

Acceptable Temperature Range: 0 - 6 degC
Air and Metal samples Acceptable Range: Ambient
Temperature Measuring device used : T-NM-007

| Sample Receipt Checklist | Comments |
|---------------------------------------------------------|----------|
| #1 *Temperature of cooler(s)? | 2 |
| #2 *Shipping container in good condition? | Yes |
| #3 *Samples received on ice? | Yes |
| #4 *Custody Seals intact on shipping container/ 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 relinquished/ received? | Yes |
| #10 Chain of Custody agrees with sample labels/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)? | No |
| #18 Water VOC samples have zero headspace? | N/A |

*** Must be completed for after-hours delivery of samples prior to placing in the refrigerator**

Analyst:

PH Device/Lot#:

Checklist completed by:

Elizabeth McClellan

Date: 11/19/2019

Checklist reviewed by:

Jessica Kramer

Date: 11/20/2019