



**SPORT ENVIRONMENTAL SERVICES, LLC**

**502 N. Big Spring Street, Midland, Texas 79701**

**Business: 432.683.1100 Fax: 888.500.0622**

May 21, 2020

Ms. Victoria Venegas

EMNRD

NMOCD – District II (Artesia, NM)

*Submitted via email: Victoria.Venegas@state.nm.us*

Re: **XTO Energy, Inc. - EMSU B Tank Battery (1RP-5446) (Incident #: NDHR1912143128)**  
**Request for Deferral Denial - Response**  
**Full delineation completed and contaminated soil from HDP2 disposed of appropriately**

Dear Ms. Venegas:

At the request of XTO Energy, Inc. (XTO), Sport Environmental Services, LLC is responding to New Mexico Oil Conservation Division (NMOCD) denial of the deferral request associated with a release of crude oil at the Eunice Monument South Unit (EMSU) B Tank Battery which was assigned the 1RP-5446 identifier. In the denial, NMOCD stated that the deferral may be granted if the contamination is fully delineated and does not cause an imminent risk to human health, the environment or groundwater. The following three bullet points and brief description of the necessary steps to be taken for further deferral consideration were provided in the denial on October 24, 2019 and are excerpted below:

**Excerpt from “EMSU B Tank Battery 1RP-5446\_XTO” Email Sent by NMOCD (October 24, 2019)**

- The release has not been fully delineated. By Rule NMAC 19.15.29.12.: *“The DEFERRAL may be granted so long as the contamination is fully delineated and does not cause an imminent risk to human health, the environment or ground water”*.
- This site is subject to the most stringent closure levels in Table 1. The Depth to groundwater is 46 feet bgs. The TPH concentration at HDP2 @6”bgs is approximately 10 000 mg/kg, which is an unacceptably high value. By rule, the sample point HDP2 must be delineated to 100 mg/kg for TPH.
- Further delineation is required @SB1.

More remediation effort should be made on this site (at least, scrape the area to remove the shallow impacted soil above the TPH regulatory limit). OCD requests this site to be fully delineated to <50’ closure standards in Table I of 19.15.29. The samples must be under the limit to verify the spill has been vertically delineated before we can approve a deferral.

Based on the additional delineation sampling that was performed following the denial, Sport Environmental Services, LLC (*Sport Environmental*) has successfully delineated the site in accordance with NMOCD's instructions. Specifically, the total petroleum hydrocarbon (TPH) concentrations that were present at the hard, caliche well pad surface of HDP2 were addressed. The affected soil at HDP2 was removed and sent to an approved facility for disposal. Additional delineation sampling at this point confirmed that the new excavation floor at this point contained TPH concentrations of approximately 33 mg/kg -- far less than the 100 mg/kg limit as demonstrated in the attached Full Analytical Report in **Attachment A**. In addition, this attachment shows that the requested further delineation of SB1 was successful and that a depth of 13.5 feet below ground surface was achieved. The TPH concentration at this depth was less than 15 mg/kg and well below the 100 mg/kg limit.

Sport Environmental, on behalf of XTO, has successfully accomplished the items detailed in NMOCD's response to the original deferral request. Sport Environmental thanks NMOCD for providing the additional guidance regarding the agency's request for additional sampling. Both samples were grab soil samples and collected at the location of their original sample points. The samples were properly collected, preserved, and delivered to Xenco Laboratories, a National Environmental Laboratory Accreditation Program (NELAP) Certified lab, for analysis.

Should NMOCD have any additional questions or comments regarding this request for deferral, please do not hesitate to contact us at (432) 683-1100.

Sincerely,

*Cianna J. Logie*

Cianna Logie, MS, REP, CESCO, RSO  
**Environmental & Regulatory Project Manager**  
**Sport Environmental Services, LLC**

#### **Attachment**

- A Full Analytical Report – Xenco Laboratories  
(Additional delineation sampling performed on January 14, 2020)**

Attachment A

Full Analytical Report – Xenco Laboratories  
(Additional delineation sampling performed on January 14, 2020)



# Certificate of Analysis Summary 649088

## Sport Environmental Services, LLC, Midland, TX

**Project Name: XTO Energy-EMSU B Tank Battery (1RP-5446)**

**Project Id:** 8015  
**Contact:** Debi Moore  
**Project Location:**

**Date Received in Lab:** Wed 01.15.2020 10:15  
**Report Date:** 01.23.2020 14:21  
**Project Manager:** John Builes

<i>Analysis Requested</i>	<i>Lab Id:</i>	649088-001	649088-002			
	<i>Field Id:</i>	SB1-S002 (Grab)	HDP2-S002 (Grab)			
	<i>Depth:</i>	13.5- ft	2- ft			
	<i>Matrix:</i>	SOIL	SOIL			
	<i>Sampled:</i>	01.14.2020 12:45	01.14.2020 13:00			
<b>Total Petroleum Hydrocarbons by Texas 1005</b>	<i>Extracted:</i>	01.21.2020 14:00	01.18.2020 10:00			
	<i>Analyzed:</i>	01.21.2020 23:35	01.19.2020 12:46			
	<i>Units/RL:</i>	mg/kg RL	mg/kg RL			
C6-C12 Gasoline Range Hydrocarbons		<15.0 24.9	<15.0 25.0			
>C12-C28 Diesel Range Hydrocarbons		<15.0 24.9	33.3 25.0			
>C28-C35 Oil Range Hydrocarbons		<15.0 24.9	<15.0 25.0			
Total TPH 1005		<15.0 24.9	33.3 25.0			

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

John Builes  
Project Manager



# Analytical Report 649088

for

**Sport Environmental Services, LLC**

**Project Manager: Debi Moore**

**XTO Energy-EMSU B Tank Battery (1RP-5446)**

**8015**

**01.23.2020**

Collected By: Client



**1211 W. Florida Ave  
Midland TX 79701**

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)



01.23.2020

Project Manager: **Debi Moore**  
**Sport Environmental Services, LLC**  
502 North Big Spring Street  
Midland, TX 79701

Reference: XENCO Report No(s): **649088**  
**XTO Energy-EMSU B Tank Battery (1RP-5446)**  
Project Address:

**Debi Moore:**

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) 649088. 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. 649088 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, appearing to read 'JB', is written over a light blue rectangular background.

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**John Builes**  
Project Manager

*A Small Business and Minority Company*

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



## Sample Cross Reference 649088

**Sport Environmental Services, LLC, Midland, TX**

XTO Energy-EMSU B Tank Battery (1RP-5446)

<b>Sample Id</b>	<b>Matrix</b>	<b>Date Collected</b>	<b>Sample Depth</b>	<b>Lab Sample Id</b>
SB1-S002 (Grab)	S	01.14.2020 12:45	13.5 ft	649088-001
HDP2-S002 (Grab)	S	01.14.2020 13:00	2 ft	649088-002



## CASE NARRATIVE

*Client Name: Sport Environmental Services, LLC*

*Project Name: XTO Energy-EMSU B Tank Battery (IRP-5446)*

Project ID: 8015  
Work Order Number(s): 649088

Report Date: 01.23.2020  
Date Received: 01.15.2020

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This laboratory is NELAC accredited under the Texas Laboratory Accreditation Program for all the methods, analytes, and matrices reported in this data package except as noted. The data have been reviewed and are technically compliant with the requirements of the methods used, except where noted by the laboratory.

**Sample receipt non conformances and comments:**

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**Sample receipt non conformances and comments per sample:**

None



## Certificate of Analytical Results 649088

### Sport Environmental Services, LLC, Midland, TX

XTO Energy-EMSU B Tank Battery (1RP-5446)

Sample Id: <b>SB1-S002 (Grab)</b>	Matrix: Soil	Date Received: 01.15.2020 10:15
Lab Sample Id: 649088-001	Date Collected: 01.14.2020 12:45	Sample Depth: 13.5 ft
Analytical Method: Total Petroleum Hydrocarbons by Texas 1005		Prep Method: TX1005P
Tech: DVM		% Moisture:
Analyst: ARM	Date Prep: 01.21.2020 14:00	Basis: Wet Weight
Seq Number: 3114055		

Parameter	Cas Number	Result	RL	MDL	Units	Analysis Date	Flag	Dil
C6-C12 Gasoline Range Hydrocarbons	PHC612	<15.0	24.9	15.0	mg/kg	01.21.2020 23:35	U	1
>C12-C28 Diesel Range Hydrocarbons	PHCG1228	<15.0	24.9	15.0	mg/kg	01.21.2020 23:35	U	1
>C28-C35 Oil Range Hydrocarbons	PHCG2835	<15.0	24.9	15.0	mg/kg	01.21.2020 23:35	U	1
Total TPH 1005	PHC635	<15.0	24.9	15.0	mg/kg	01.21.2020 23:35	U	1
Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag		
o-Terphenyl	84-15-1	73	%	70-130	01.21.2020 23:35			
1-Chlorooctane	111-85-3	76	%	70-130	01.21.2020 23:35			



## Certificate of Analytical Results 649088

### Sport Environmental Services, LLC, Midland, TX

XTO Energy-EMSU B Tank Battery (1RP-5446)

Sample Id: <b>HDP2-S002 (Grab)</b>	Matrix: Soil	Date Received: 01.15.2020 10:15
Lab Sample Id: 649088-002	Date Collected: 01.14.2020 13:00	Sample Depth: 2 ft
Analytical Method: Total Petroleum Hydrocarbons by Texas 1005		Prep Method: TX1005P
Tech: LRI		% Moisture:
Analyst: ARM	Date Prep: 01.18.2020 10:00	Basis: Wet Weight
Seq Number: 3113810		

Parameter	Cas Number	Result	RL	MDL	Units	Analysis Date	Flag	Dil
C6-C12 Gasoline Range Hydrocarbons	PHC612	<15.0	25.0	15.0	mg/kg	01.19.2020 12:46	U	1
>C12-C28 Diesel Range Hydrocarbons	PHCG1228	<b>33.3</b>	25.0	15.0	mg/kg	01.19.2020 12:46		1
>C28-C35 Oil Range Hydrocarbons	PHCG2835	<15.0	25.0	15.0	mg/kg	01.19.2020 12:46	U	1
<b>Total TPH 1005</b>	PHC635	<b>33.3</b>	25.0	15.0	mg/kg	01.19.2020 12:46		1

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
o-Terphenyl	84-15-1	78	%	70-130	01.19.2020 12:46	
1-Chlorooctane	111-85-3	75	%	70-130	01.19.2020 12:46	





**Sport Environmental Services, LLC**  
XTO Energy-EMSU B Tank Battery (1RP-5446)

**Analytical Method:** Total Petroleum Hydrocarbons by Texas 1005      Prep Method: TX1005P  
 Seq Number: 3113810      Matrix: Solid      Date Prep: 01.18.2020  
 MB Sample Id: 7694736-1-BLK      LCS Sample Id: 7694736-1-BKS      LCSD Sample Id: 7694736-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
C6-C12 Gasoline Range Hydrocarbons	<15.0	1000	1030	103	1000	100	75-125	3	20	mg/kg	01.19.2020 12:07	
>C12-C28 Diesel Range Hydrocarbons	<15.0	1000	982	98	966	97	75-125	2	20	mg/kg	01.19.2020 12:07	

Surrogate	MB %Rec	MB Flag	LCS %Rec	LCS Flag	LCSD %Rec	LCSD Flag	Limits	Units	Analysis Date
o-Terphenyl	83		86		86		70-130	%	01.19.2020 12:07
1-Chlorooctane	79		97		96		70-130	%	01.19.2020 12:07

**Analytical Method:** Total Petroleum Hydrocarbons by Texas 1005      Prep Method: TX1005P  
 Seq Number: 3114055      Matrix: Solid      Date Prep: 01.21.2020  
 MB Sample Id: 7694876-1-BLK      LCS Sample Id: 7694876-1-BKS      LCSD Sample Id: 7694876-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
C6-C12 Gasoline Range Hydrocarbons	<15.0	1000	1000	100	982	98	75-125	2	20	mg/kg	01.21.2020 21:28	
>C12-C28 Diesel Range Hydrocarbons	<15.0	1000	863	86	876	88	75-125	1	20	mg/kg	01.21.2020 21:28	

Surrogate	MB %Rec	MB Flag	LCS %Rec	LCS Flag	LCSD %Rec	LCSD Flag	Limits	Units	Analysis Date
o-Terphenyl	89		81		82		70-130	%	01.21.2020 21:28
1-Chlorooctane	89		91		92		70-130	%	01.21.2020 21:28

**Analytical Method:** Total Petroleum Hydrocarbons by Texas 1005      Prep Method: TX1005P  
 Seq Number: 3113810      Matrix: Solid      Date Prep: 01.18.2020  
 MB Sample Id: 7694736-1-BLK

Parameter	MB Result	Units	Analysis Date	Flag
>C28-C35 Oil Range Hydrocarbons	<15.0	mg/kg	01.19.2020 11:48	

**Analytical Method:** Total Petroleum Hydrocarbons by Texas 1005      Prep Method: TX1005P  
 Seq Number: 3114055      Matrix: Solid      Date Prep: 01.21.2020  
 MB Sample Id: 7694876-1-BLK

Parameter	MB Result	Units	Analysis Date	Flag
>C28-C35 Oil Range Hydrocarbons	<15.0	mg/kg	01.21.2020 21:07	

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



**Sport Environmental Services, LLC**  
XTO Energy-EMSU B Tank Battery (1RP-5446)

**Analytical Method: Total Petroleum Hydrocarbons by Texas 1005**

Seq Number: 3113810

Matrix: Soil

Prep Method: TX1005P

Parent Sample Id: 649088-002

MS Sample Id: 649088-002 S

Date Prep: 01.18.2020

MSD Sample Id: 649088-002 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
C6-C12 Gasoline Range Hydrocarbons	<15.0	1000	1000	100	1040	104	75-125	4	30	mg/kg	01.19.2020 13:05	
>C12-C28 Diesel Range Hydrocarbons	33.3	1000	981	95	987	95	75-125	1	30	mg/kg	01.19.2020 13:05	

Surrogate	MS %Rec	MS Flag	MSD %Rec	MSD Flag	Limits	Units	Analysis Date
o-Terphenyl	84		86		70-130	%	01.19.2020 13:05
1-Chlorooctane	108		101		70-130	%	01.19.2020 13:05

**Analytical Method: Total Petroleum Hydrocarbons by Texas 1005**

Seq Number: 3114055

Matrix: Soil

Prep Method: TX1005P

Parent Sample Id: 649174-001

MS Sample Id: 649174-001 S

Date Prep: 01.21.2020

MSD Sample Id: 649174-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
C6-C12 Gasoline Range Hydrocarbons	<15.0	999	882	88	893	90	75-125	1	30	mg/kg	01.21.2020 22:31	
>C12-C28 Diesel Range Hydrocarbons	<15.0	999	889	89	860	86	75-125	3	30	mg/kg	01.21.2020 22:31	

Surrogate	MS %Rec	MS Flag	MSD %Rec	MSD Flag	Limits	Units	Analysis Date
o-Terphenyl	70		71		70-130	%	01.21.2020 22:31
1-Chlorooctane	99		77		70-130	%	01.21.2020 22:31

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:** Sport Environmental Services, LLC

**Date/ Time Received:** 01.15.2020 10.15.00 AM

**Work Order #:** 649088

**Acceptable Temperature Range:** 0 - 6 degC

**Air and Metal samples Acceptable Range:** Ambient

**Temperature Measuring device used :** R8

### Sample Receipt Checklist

### Comments

#1 *Temperature of cooler(s)?	5.9	
#2 *Shipping container in good condition?	Yes	
#3 *Samples received on ice?	Yes	
#4 *Custody Seals intact on shipping container/ cooler?	N/A	
#5 Custody Seals intact on sample bottles?	N/A	
#6*Custody Seals Signed and dated?	N/A	
#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	TPH was in bulk container
#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)?	N/A	
#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:**



Brianna Teel

Date: 01.15.2020

**Checklist reviewed by:**



John Builes

Date: 01.17.2020