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-144 Revised April 3, 2017

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.

For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application RCVD 8/1/19
Type of action: Below grade tank registration Permit of a pit or proposed alternative method Closure of a pit, below-grade tank, or proposed alternative method Modification to an existing permit/or registration Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method
Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request lease be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the avironment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.
1. Operator: Hilcorp Energy Company OGRID #: 372171 Address: 382 Road 3100 Aztec, NM 87410 Facility or well name: HOWELL COM J 301 API Number: 30-045-26896 OCD Permit Number: U/L or Qtr/Qtr A Section 11 Township 30N Range 08W County: San Juan Center of Proposed Design: Latitude 36.830277 °N Longitude -107.639582 °W NAD83
Surface Owner: Federal State Private Tribal Trust or Indian Allotment Pit: Subsection F, G or J of 19.15.17.11 NMAC Temporary: Drilling Workover
Below-grade tank: Subsection I of 19.15.17.11 NMAC Volume: 120
. Alternative Method: Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.
Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks) Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, hospital, institution or church) Four foot height, four strands of barbed wire evenly spaced between one and four feet Alternate. Please specify

6. Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)	•
☐ Screen ☐ Netting ☐ Other	
Monthly inspections (If netting or screening is not physically feasible)	
Signs: Subsection C of 19.15.17.11 NMAC	
12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers	
Signed in compliance with 19.15.16.8 NMAC	
☐ Signed in compnance with 19.13.10.8 NMAC	
8. Variances and Exceptions:	
Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.	
Please check a box if one or more of the following is requested, if not leave blank: Uariance(s): Requests must be submitted to the appropriate division district for consideration of approval.	
Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.	
9.	
Siting Criteria (regarding permitting): 19.15.17.10 NMAC Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acce,	ntahla sauvaa
material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	puote source
General siting	
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit. NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
MM Office of the State Engineer - TWATERS database search, OSGS, Data obtained from hearby wens	_
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	☐ Yes ☐ No
adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (Does not apply to below grade tanks) - Written confirmation or verification from the municipality; Written approval obtained from the municipality	
Within the area overlying a subsurface mine. (Does not apply to below grade tanks) - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
Within an unstable area. (Does not apply to below grade tanks) - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological	☐ Yes ☐ No
Society; Topographic map	
Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map	Yes No
Below Grade Tanks	
NV(d.) 100 C + C - of one of the first of th	
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).	☐ Yes ⊠ No
- Topographic map; Visual inspection (certification) of the proposed site	
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;	☐ Yes ☑ No
- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	definitions et alimines et
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)	
Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole,	D V D N
or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.) - Topographic map; Visual inspection (certification) of the proposed site	Yes No
Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial	☐ Yes ☐ No
application.	
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock	
watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	Yes No

Within 100 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit Non-low chloride drilling fluid	
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
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, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Permanent Pit or Multi-Well Fluid Management Pit	
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
10. Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 N	INAAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the do	
attached. Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19. and 19.15.17.13 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number:	15.17.9 NMAC
11.	
Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the do attached. Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC A List of wells with approved application for permit to drill associated with the pit. Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19 and 19.15.17.13 NMAC Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC	
Previously Approved Design (attach copy of design) API Number: or Permit Number:	

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the	documents are
attached. Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Climatological Factors Assessment Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC Quality Control/Quality Assurance Construction and Installation Plan Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Nuisance or Hazardous Odors, including H ₂ S, Prevention Plan Emergency Response Plan Oil Field Waste Stream Characterization Monitoring and Inspection Plan Erosion Control Plan Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC	
Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.	
Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-well F Alternative Proposed Closure Method: Waste Excavation and Removal Waste Removal (Closed-loop systems only) On-site Closure Method (Only for temporary pits and closed-loop systems) In-place Burial On-site Trench Burial Alternative Closure Method	luid Management Pit
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be closure plan. Please indicate, by a check mark in the box, that the documents are attached. ☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC ☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC ☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings) ☐ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC ☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	
15.	
Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. I 19.15.17.10 NMAC for guidance.	
Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	

adopted pursuant to NMSA 1978, Section 3-27-3, as amended.					
- Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No				
Within the area overlying a subsurface mine Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No				
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map					
Within a 100-year floodplain.	Yes No				
- FEMA map	Yes No				
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached. Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.13 NMAC Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved) Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC					
Operator Application Certification:					
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and believe to the best of my knowledge and my knowledge and believe to the best of my knowledge and believe to the best of my knowledge and believe to the best of my knowledge and	ief.				
Name (Print): Title:					
Signature: Date:					
Signature: Date:					
Signature: Date: e-mail address: Telephone:					
e-mail address: Telephone:					
e-mail address: Telephone:					
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e-mail address:	19 g the closure report. t complete this				
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e-mail address: Telephone:	the closure report. t complete this				

22.						
Operator Closure Certification:						
I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and						
belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.						
Name (Print): Priscilla Shorty	Title: Operations/Regulatory Technician – Sr					
Signature: Susilla Shorty	Date: 8/1/2019					
e-mail address: pshorty@hilcorp.com Telepho	ne:(505) 324-5188					

Hilcorp Energy Company San Juan Basin Below Grade Tank Closure Report

Lease Name: Howell Com J 301

API No.: 30-045-26896

In accordance with Rule 19.15.17.13 NMAC the following information describes the closure of the below-grade tank referenced above. All proper documentation regarding closure activities is being included with the C-144.

General Plan:

1. HILCORP shall close a below-grade tank within 60 days of cessation of operations per Subsection G.4 of 19.15.17.13 NMAC. This will include a) below-grade tanks that do not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC; b) an earlier date that the division requires because of imminent danger to fresh water, public health or the environment. For any closure, HILCORP will file the C144 Closure Report as required.

The below-grade tank referenced above was permitted and closed within 60 days of cessation of the below-grade tanks operation.

2. HILCORP shall remove liquids and sludge from a below-grade tank prior to implementing a closure method and shall dispose of the liquids and sludge in a division-approved facility. The facilities to be used will be Basin Disposal (Permit #NM-01-005), JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B) and Envirotech Land Farm (Permit #NM-01-011). The liner after being cleaned well (Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC) will be disposed of at the San Juan County Regional Landfill located on CR 3100.

All recovered liquids were disposed of at Basin Disposal (Permit #NM-01-005) and any sludge or soil required to be removed to facilitate closure was hauled to Envirotech Land Farm (Permit #NM-01-011) and JFJ Landfarm % IEI (Permit #NM-01-0010B). The liner was cleaned per Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC was disposed of at the San Juan County Regional Landfill located on CR 3100.

3. HILCORP will receive prior approval to remove the below-grade tank and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves.

The below-grade tank was disposed of in a division-approved manner.

4. If there is any on-site equipment associated with a below-grade tank, then HILCORP shall remove the equipment, unless the equipment is required for some other purpose.

All on-site equipment associated with the below-grade tank was removed.

5. HILCORP will test the soils beneath the below-grade tank to determine whether a release has occurred. HILCORP shall collect, at a minimum, a five point, composite sample; collect individual grab samples from any area that is wet, discolored or showing other evidence of a release; and analyzed for the constituents listed in Table I of 19.15.17.13 NMAC. Hilcorp shall notify the division of its results on form C-141.

A five point composite sample was taken of the below-grade tank using sampling tools and all samples tested per Subsection B of 19.15.17.1 3(B)(1)(b). (Sample results attached). Form C-141 is attached.

Components	Tests Method	Limit (mg/kg)
Benzene	EPA SW-846 8021B or 8260B	0.2
BTEX	EPA SW-846 8021B or 8260B	50
TPH	EPA SW-846 418.1	100
Chlorides	EPA 300.0	250

6. If HILCORP or the division determines that a release has occurred, then HILCORP shall comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC, as appropriate.

A release was not determined for the above referenced well.

7. If the sampling program demonstrates that a release has not occurred or that any release does not exceed the concentrations specified in Table I of 19.15.17.13 NMAC, then HILCORP shall backfill the excavation with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover; recontour and revegetate the site.

The below-grade tank area passed all requirements of Paragraph (4) of Subsection E of 19.15.17.13 NMAC and was backfilled with compacted, non-waste containing, earthen material.

- 8. Notice of Closure will be given prior to closure to the Aztec Division office between 72 hours and one week via email or verbally. The notification of closure will include the following:
 - i. Operator's name
 - ii. Location by Unit Letter, Section, Township, and Range. Well name and API number.

Notification is attached.

9. The surface owner shall be notified of HILCORP's closing of the below-grade tank 72 hours, but not more than one week, prior to closure as per the approved closure plan via certified mail, return receipt requested.

The closure process notification to the landowner was sent via email. (See Attached) (Well located on Federal Land, certified mail is not required for Federal Land per BLM/OCD MOU.)

10. Re-contouring of location will match fit, shape, line, form and texture of the surrounding. Re-shaping will include drainage control, prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be place in areas where needed to prevent erosion on a large scale. Final re-contour shall have a uniform appearance with smooth surface, fitting the natural landscape.

The below-grade tank area was re-contoured to match fit, shape, line, form and texture of the surrounding area. Re-shaping including drainage control, to prevent ponding and erosion. Natural drainages were unimpeded and water bars and/or silt traps were placed in areas where needed to prevent erosion on a large scale. Final recontour has a uniform appearance with smooth surface, fitting the natural landscape.

11. HILCORP shall seed the disturbed areas the first favorable growing season following closure of a below-grade tank. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved methods. BLM stipulated seed mixes will be used on federally regulated lands and division-approved seed mixtures (administratively approved if required) will be utilized on all State or private lands. A uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre- disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds. If alternate seed mix is required by the state, private owner or tribe, it will be implemented with administrative approval if needed. Hilcorp will repeat seeding or planting will be continued until successful vegetative growth occurs.

Provision 13 was accomplished through complying with BLM seeding requirements as allowed by the BLM/OCD MOU.

12. A minimum of four feet of cover shall be achieved and the cover shall include one foot of suitable material, with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.

The below-grade tank area was backfilled and more than four feet of cover was achieved and the cover included one foot of suitable material to establish vegetation at the site.

- 13. All closure activities will include proper documentation and be available for review upon request and will be submitted to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on C-144 and incorporate the following:
 - Soil Backfilling and Cover Installation (See Report)
 - Re-vegetation application rates and seeding techniques (See Report)
 - Photo documentation of the site reclamation (Included as an attachment)
 - Confirmation Sampling Results (Included as an attachment)
 - Proof of closure notice (Included as an attachment)

Priscilla Shorty

From:

Priscilla Shorty

Sent:

Monday, June 24, 2019 12:03 PM

To:

Mandi Walker; 'Smith, Cory, EMNRD'; 'Powell, Brandon, EMNRD'; 'aadeloye@blm.gov'; '11thomas@blm.gov'

Cc:

Jennifer Deal; Ben Mitchell; Chad Perkins

Subject:

Howell Com J 301 (30-045-26896) - 72 hour BGT notification

Attachments:

Howell Com J 301 BGT.pdf

Subject: 72 Hour BGT Notification

Anticipated Start Date: Thursday June 27, 2019 @ 9:00 AM.

The subject well was P&A'd and has a <u>120 BBL BGT</u> that will be permanently removed. The BGT permit is attached.

Well Name: Howell Com J 301

API#: 30-045-26896

Location: A, 11 30N, 08W

Footages: 595' FNL & 1085' FEL

Surface Owner: Federal Reason: Plug and Abandon

Please let me know if you have any questions or concerns,

Priscilla A. Shorty

San Juan North Regulatory Technician Hilcorp Energy Company 505-324-5188

pshorty@hilcorp.com

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

Responsible Party

Contact Name

Hilcorp Energy Company

Priscilla Shorty

State of New Mexico Energy Minerals and Natural Resources Department

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

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

OGRID

372171

Contact Telephone (505) 324-5188

Contact ema	Contact email pshorty@hilcorp.com		Incident #	(assigned by OCL))		
Contact mail	ing address	382 Road 3100	Aztec NM 87	410			
			Location	ı of R	Release S	ource	
Latitude	36.830277	7 °N	(NAD 83 in d	lecimal de	Longitude _ egrees to 5 decir	-107,63958 nal places)	2 °W
Site Name H	owell Com .	J 301			Site Type	Gas Well	
Date Release	Discovered	N/A			API# (if app	olicable) 30-045	-26896
Unit Letter	Section	Township	Range		Cour	nty	
A	11	30N	08W	Sa	n Juan		
Surface Owner	Materia	Federal Tr	Nature an	d Vo	lume of l	justification for th	ne volumes provided below) overed (bbls)
Produced		Volume Release					overed (bbls)
Is the concentration of dissolved chlori produced water >10,000 mg/l?			chlorid	e in the	Yes 1	` '	
Condensa	ite	Volume Release				Volume Rec	overed (bbls)
☐ Natural Gas Volume Released (Mcf)					Volume Rec	overed (Mcf)	
Other (describe) Volume/Weight Released (provide unit			de units)	Volume/Wei	ight Recovered (provide units)	
Cause of Rel-	ease						
No release wa	s encountere	d during the BGT (Closure.				

Form C-141 Page 2

State of New Mexico Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by	If YES, for what reason(s) does the responsible party consider this a major release?
19.15.29.7(A) NMAC?	
☐ Yes ⊠ No	N/A
If YES, was immediate no	otice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?
Not Required	
	Initial Response
The responsible p	party must undertake the following actions immediately unless they could create a safety hazard that would result in injury
☐ The source of the rele	ease has been stopped.
☐ The impacted area ha	s been secured to protect human health and the environment.
Released materials ha	we been contained via the use of berms or dikes, absorbent pads, or other containment devices.
All free liquids and re	coverable materials have been removed and managed appropriately.
If all the actions described	d above have <u>not</u> been undertaken, explain why:
N/A	
Per 19.15.29.8 B. (4) NM	AC the responsible party may commence remediation immediately after discovery of a release. If remediation
has begun, please attach a	a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred at area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.
	, , , , , , , , , , , , , , , , , , , ,
	mation given above is true and complete to the best of my knowledge and understand that pursupant to OCD rules and required to report and/or file certain release notifications and perform corrective actions for releases which may endanger
	nent. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have attended at each and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In
addition, OCD acceptance of	f 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:	Priscilla Shorty Title: Operations/Regulatory Technician – Sr.
Signature:	Bulla Norty Date: 8/1/2019
email: pshorty	@hilcorp.com
OCD Only	
Received by:	Date:



ANALYTICAL REPORT

July 11, 2019





Ss

Cn

Sr

Qc

GI

HilCorp-Farmington, NM

Sample Delivery Group:

L1114342

Samples Received:

06/29/2019

Project Number:

HOWELL COM J #301

Description:

HOWELL COM J #301

Site:

HOWELL COM J #301

Report To:

Jennifer Deal

382 Road 3100

Aztec, NM 87401

Entire Report Reviewed By: Washne R Richards

Daphne Richards Project Manager Results relate only to the items tested or calibrated and are reported as rounded values. This test report shall not be reproduced, except in full, without written approval of the laboratory. Where applicable, sampling conducted by Pace National is performed per guidance provided in laboratory standard operating procedures: 060302, 060303, and 060304.



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SAMPLE SUMMARY

ONE LAB. NATIONWIDE,



BGT BASE L1114342-01 Solid			Collected by Chad Perkins	Collected date/time 06/27/19 09:53	Received da 06/29/19 08	324.315.015
Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Wet Chemistry by Method 9056A	WG1305724	1	07/07/19 21:15	07/07/19 23:09	ST	Mt. Juliet, TN
Volatile Organic Compounds (GC) by Method 8015/8021	WG1308218	1	07/06/19 09:17	07/09/19 13:18	BMB	Mt. Juliet, TN
Semi-Volatile Organic Compounds (GC) by Method 8015	WG1308619	1	07/10/19 10:20	07/11/19 01:51	KME	Mt. Juliet, TN























All sample aliquots were received at the correct temperature, in the proper containers, with the appropriate preservatives, and within method specified holding times, unless qualified or notated within the report. Where applicable, all MDL (LOD) and RDL (LOQ) values reported for environmental samples have been corrected for the dilution factor used in the analysis. All Method and Batch Quality Control are within established criteria except where addressed in this case narrative, a non-conformance form or properly qualified within the sample results. By my digital signature below, I affirm to the best of my knowledge, all problems/anomalies observed by the laboratory as having the potential to affect the quality of the data have been identified by the laboratory, and no information or data have been knowingly withheld that would affect the quality of the data.

















Daphne Richards

Dapline R Richards

BGT BASE

SAMPLE RESULTS - 01

ONE LAB. NATIONWIDE.



Collected date/time: 06/27/19 09:53

Wet Chemistry by Method 9056A

	Result	Qualifier	RDL	Dilution	Analysis	<u>Batch</u>	
Analyte	mg/kg		mg/kg		date / time		
Chloride	14.4	В	10.0	1	07/07/2019 23:09	WG1305724	



Volatile Organic Compounds (GC) by Method 8015/8021

	Result	Qualifier	RDL	Dilution	Analysis	Batch	
Analyte	mg/kg		mg/kg		date / time		
Benzene	0.00163		0.000500	1	07/09/2019 13:18	WG1308218	
Toluene	ND		0.00500	1	07/09/2019 13:18	WG1308218	
Ethylbenzene	0.000502		0.000500	1	07/09/2019 13:18	WG1308218	
Total Xylene	0.00216	<u>B</u>	0.00150	1	07/09/2019 13:18	WG1308218	
TPH (GC/FID) Low Fraction	0.107	В	0.100	1	07/09/2019 13:18	WG1308218	
(S) a,a,a-Trifluorotoluene(FID)	103		77.0-120		07/09/2019 13:18	WG1308218	
(S) a,a,a-Trifluorotoluene(PID)	92.4		72.0-128		07/09/2019 13:18	WG1308218	



Semi-Volatile Organic Compounds (GC) by Method 8015

	Result	Qualifier	RDL	Dilution	Analysis	Batch	
Analyte	mg/kg		mg/kg		date / time		
C10-C28 Diesel Range	ND		4.00	1	07/11/2019 01:51	WG1308619	
C28-C40 Oil Range	ND		4.00	1	07/11/2019 01:51	WG1308619	
(S) o-Terphenyl	80.4		18.0-148		07/11/2019 01:51	WG1308619	



GI

QUALITY CONTROL SUMMARY



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	MB RDL	mg/kg	10.0
	MB MDL	mg/kg	0.795
	MB Qualifier		ار
7/07/19 22:30	MB Result	mg/kg	2.64
(MB) R3428756-1 07/07/19 22:30		Analyte	Chloride

L1114359-01 Original Sample (OS) • Duplicate (DUP)

	DUP Qualifier Limits	%	15
07/19 23:25	Dilution DUP RPD	%	10 6.36
) R3428756-3 07/	Original Result DUP Result (dry)	mg/kg	2370
7/07/19 23:17 • (DUP,	Original Resu (dry)	mg/kg	2220
(OS) L1114359-01 07/07/19 23:17 • (DUP) R3428756-3 07/07/19 23:25		Analyte	Chloride

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L1114374-03 Original Sample (OS) • Duplicate (DUP)

(OS) L1114374-03 07/08/19 02:50 • (DUP) R3428756-6 07/08/19 02:58	19 02:50 · (DUI	P) R3428756-6	61/80//0	02:58		
	Original Resu (dry)	Original Result DUP Result (dry)	Dilution	Dilution DUP RPD	DUP Qualifier	DUP RPD Limits
Analyte	mg/kg	mg/kg		%		%
Chloride	13100	14000	20	6.81		

Sc

Laboratory Control Sample (LCS)

(LCS) K34Z8/56-2 U//U//19 22:39	00.77						
	Spike Amount	t LCS Result	LCS Rec.	Rec. Limits	LCS Qualifier		
Analyte	mg/kg	mg/kg	%	%			
Chloride	200	196	98.2	80.0-120			

L1114365-01 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

OS) L1114365-01 07/0	L1114365-01 07/08/19 00:33 • (MS) R3428756-4 07/08/19 00:42 • (MSD) R34:	3428756-4 07,	/08/19 00:42 • ((MSD) R342875	.26-5 07/08/	19 00:50						
	Spike Amount (dry)	Spike Amount Original Result MS Result (dry) MSD Result (dry) (dry)	MS Result (dry)	MSD Result (dry)	MS Rec.	MSD Rec.	Dilution	Rec. Limits	MS Qualifier	MSD Qualifier	RPD	RPD Limits
Analyte	mg/kg	mg/kg	mg/kg	mg/kg	%	%		%			%	%
hloride	538	803	1270	1340	87.4	9.66		80.0-120	ш	ш	5.03	15

L1114342 SDG:

DATE/TIME: 07/11/19 12:24

WG1308218 Volatile Organic Compounds (GC) by Method 8015/8021	09) spunodu	c) by Method 8	.015/8021	g	QUALITY CONTROL	ONTROL SU	SUMMARY		ONELA	ONE LAB. NATIONWIDE.	*
Method Blank (MB)	3)										_
(MB) R3429025-3 07/09/1912:24	9/19 12:24 MB Result	MB Qualifier	MB MDI	MB RDI							3
Analyte	mg/kg		mg/kg	mg/kg							² Tc
Benzene	ם		0.000120	0.000500							
loluene	0.000318	-) I	0.0000150	0.00500							Ss
Total Xvlene	ם ב		0.000110	0.000500							
TPH (GC/FID) Low Fraction	0.0380	ור	0.0217	0.100			1				⁴ C
(S) a,a,a-Trifluorotoluene(FID)	115			77.0-120							ıc
(S) a,a,a-Trifluorotoluene(PID)	106			72.0-128							, s
Laboratory Control Sample (LCS)	ol Sample	(LCS)									တ္တ
(LCS) R3429025-1 07/09/19 11:10	9/19 11:10										្ច
7	Spike Amount	ınt LCS Result	LCS Rec.	Rec. Limits	LCS Qualifier						
Analyte	mg/kg	mg/kg	%	%	3						8
Benzene	0.0500	0.0541	108	76.0-121							ŧ
Toluene	0.0500	0.0508	102	80.0-120							(g
Ethylbenzene	0.0500	0.0483	2.96	80.0-124							ာ ပ
Total Xylene	0.150	0.141	94.3	37.0-160							
(S) a,a,a-Trifluorotoluene(FID)			911	77.0-120							
(S) a,a,a-Trifluorotoluene(PID)			116	72.0-128							
Laboratory Control Sample (LCS)	ol Sample	(LCS)									
(LCS) R3429025-2 07/09/19 11:43	19/19 11:43									e n.	
Analyte	Spike Amou mg/kg	Spike Amount LCS Result mg/kg	LCS Rec. %	Rec. Limits %	LCS Qualifier						
TPH (GC/FID) Low Fraction	5.50	5.77	105	72.0-127							
(S) a,a,a-Trifluorotoluene(FID)			011	77.0-120							
(S) a,a,a-Trifluorotoluene(PID)			125	72.0-128							
HilCon	ACCOUNT: HilCorp-Farmington, NM	M		PRO HOWELL	PROJECT: HOWELL COM J #301	IS CLUM	SDG: L1114342	DATE/TIME: 07/11/19 12:24		PAGE: 7 of 11	

WG1308619

Method Blank (MB)

Semi-Volatile Organic Compounds (GC) by Method 8015

QUALITY CONTROL SUMMARY

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ONE LAB. NATIONWIDE.



	MB RDL	mg/kg	4.00	4.00	148
	MB MDL	mg/kg	1.61	0.274	
	MB Qualifier			ור	
19 22:31	MB Result	mg/kg	Э	0.516	54.2
(MB) R3429521-1 07/10/19 22:31		Analyte	C10-C28 Diesel Range	C28-C40 Oil Range	(S) o-Terphenyl

Laboratory Control Sample (LCS)

(LCS) R3429521-2 07/11/19 01:13	1/19 01:13				
	Spike Amount LCS Result		LCS Rec.	Rec. Limits	LCS Qualifier
Analyte	mg/kg	mg/kg	%	%	
C10-C28 Diesel Range	50.0	46.9	93.8	50.0-150	
(S) o-Terphenyl			74.6	18.0-148	





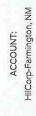
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GLOSSARY OF TERMS



Guide to Reading and Understanding Your Laboratory Report

The information below is designed to better explain the various terms used in your report of analytical results from the Laboratory. This is not intended as a comprehensive explanation, and if you have additional questions please contact your project representative.

Abbreviations and Definitions

Tibel C Vidio 11 a in	a Deminions
(dry)	Results are reported based on the dry weight of the sample. [this will only be present on a dry report basis for soils].
MDL	Method Detection Limit.
ND	Not detected at the Reporting Limit (or MDL where applicable).
RDL	Reported Detection Limit.
Rec.	Recovery.
RPD	Relative Percent Difference.
SDG	Sample Delivery Group.
(S)	Surrogate (Surrogate Standard) - Analytes added to every blank, sample, Laboratory Control Sample/Duplicate and Matrix Spike/Duplicate; used to evaluate analytical efficiency by measuring recovery. Surrogates are not expected to be detected in all environmental media.
U	Not detected at the Reporting Limit (or MDL where applicable).
Analyte	The name of the particular compound or analysis performed. Some Analyses and Methods will have multiple analytes reported.
Dilution	If the sample matrix contains an interfering material, the sample preparation volume or weight values differ from the standard, or if concentrations of analytes in the sample are higher than the highest limit of concentration that the laboratory can accurately report, the sample may be diluted for analysis. If a value different than 1 is used in this field, the result reported has already been corrected for this factor.
Limits	These are the target % recovery ranges or % difference value that the laboratory has historically determined as normal for the method and analyte being reported. Successful QC Sample analysis will target all analytes recovered or duplicated within these ranges.
Original Sample	The non-spiked sample in the prep batch used to determine the Relative Percent Difference (RPD) from a quality control sample. The Original Sample may not be included within the reported SDG.
Qualifier	This column provides a letter and/or number designation that corresponds to additional information concerning the result reported. If a Qualifier is present, a definition per Qualifier is provided within the Glossary and Definitions page and potentially a discussion of possible implications of the Qualifier in the Case Narrative if applicable.
Result	The actual analytical final result (corrected for any sample specific characteristics) reported for your sample. If there was no measurable result returned for a specific analyte, the result in this column may state "ND" (Not Detected) or "BDL" (Below Detectable Levels). The information in the results column should always be accompanied by either an MDL (Method Detection Limit) or RDL (Reporting Detection Limit) that defines the lowest value that the laboratory could detect or report for this analyte.
Uncertainty (Radiochemistry)	Confidence level of 2 sigma.
Case Narrative (Cn)	A brief discussion about the included sample results, including a discussion of any non-conformances to protocol observed either at sample receipt by the laboratory from the field or during the analytical process. If present, there will be a section in the Case Narrative to discuss the meaning of any data qualifiers used in the report.
Quality Control Summary (Qc)	This section of the report includes the results of the laboratory quality control analyses required by procedure or analytical methods to assist in evaluating the validity of the results reported for your samples. These analyses are not being performed on your samples typically, but on laboratory generated material.
Sample Chain of Custody (Sc)	This is the document created in the field when your samples were initially collected. This is used to verify the time and date of collection, the person collecting the samples, and the analyses that the laboratory is requested to perform. This chain of custody also documents all persons (excluding commercial shippers) that have had control or possession of the samples from the time of collection until delivery to the laboratory for analysis.
Sample Results (Sr)	This section of your report will provide the results of all testing performed on your samples. These results are provided by sample ID and are separated by the analyses performed on each sample. The header line of each analysis section for each sample will provide the name and method number for the analysis reported.
Sample Summary (Ss)	This section of the Analytical Report defines the specific analyses performed for each sample ID, including the dates and times of preparation and/or analysis.

Qualifier	Description
В	The same analyte is found in the associated blank.
E	The analyte concentration exceeds the upper limit of the calibration range of the instrument established by the initial calibration (ICAL).
J	The identification of the analyte is acceptable; the reported value is an estimate.















ACCREDITATIONS & LOCATIONS





State Accreditations

Alabama	40660
Alaska	17-026
Arizona	AZ0612
Arkansas	88-0469
California	2932
Colorado	TN00003
Connecticut	PH-0197
Florida	E87487
Georgia	NELAP
Georgia 1	923
ldaho	TN00003
Illinois	200008
Indiana	C-TN-01
lowa	364
Kansas	E-10277
Kentucky 16	90010
Kentucky ²	16
Louisiana	Al30792
Louisiana ¹	LA180010
Maine	TN0002
Maryland	324
Massachusetts	M-TN003
Michigan	9958
Minnesota	047-999-395
Mississippi	TN00003
Missouri	340
Montana	CERT0086

Nebraska	NE-OS-15-05
Nevada	TN-03-2002-34
New Hampshire	2975
New Jersey-NELAP	TN002
New Mexico 1	n/a
New York	11742
North Carolina	Env375
North Carolina 1	DW21704
North Carolina ³	41
North Dakota	R-140
Ohio-VAP	CL0069
Oklahoma	9915
Oregon	TN200002
Pennsylvania	68-02979
Rhode Island	LAO00356
South Carolina	84004
South Dakota	n/a
Tennessee 1 4	2006
Texas	T104704245-18-19
Texas ⁵	LAB0152
Utah	TN00003
Vermont	VT2006
Virginia	460132
Washington	C847
West Virginia	233
Wisconsin	9980939910
Wyoming	A2LA

Third Party Federal Accreditations

A2LA - ISO 17025	1461.01	
A2LA - ISO 17025 5	1461.02	
Canada	1461.01	
EPA-Cryoto	TN00003	

100789
1461.01
P330-15-00234

¹ Drinking Water ² Underground Storage Tanks ³ Aquatic Toxicity ⁴ Chemical/Microbiological ⁵ Mold ⁶ Wastewater n/a Accreditation not applicable

Our Locations

Pace National has sixty-four client support centers that provide sample pickup and/or the delivery of sampling supplies. If you would like assistance from one of our support offices, please contact our main office. Pace National performs all testing at our central laboratory.























reservative Chain of Custody Page of	. Pace Analytical	Metonal Context for Italia & Incomplete	12055 Lebanon Rd 136.2 1	Phone 615-778-5858	11 11 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Te GISI Acctrum:HILCORANM	Template	Prelogin: TSR: Daphne Richards	Shipped Va: Shipped Va: Remarks Sample # fib only	-						np coc Seal Present/Intact: NP I N COC Signed/Accurate: Y N N N N Bottles arraye intact: Y N Coc Signed/Accurate: Y N Coc	וא			
Analysis / Container / Preservative				(0;	3 €79 (208		π <i>ઇ</i>	 × × ×						pH Temp.	ULSans a su	rip Blank Received;	Temp: °C Bottles I) alec
Billing Information:	Po Box 61529 Chk Houston, TX 77208	10 3 2 Lo 10	SEPTIMENTON	City/State Collected:	Lab Project #	P.O.#	Quote#	Date Results Needed Wo.	Date Time Cntrs	1 6:53 1							Tracking#	Received by: (Signature)	e: Received by: (Signature)	e: Received for lab by: (Signature)
		Lkhool	DEAL SCHOOL	7	Client Project #	Sie/Facility ID# P.O.	Rush? (Lab M		Comp/Grab Matrix Depth	Lowo SS					Remarks:	Samples returned via:	UPS FedEx Couner	Date: Firme: 6-28-19 Time:		Date: Time:
HilCorp-Farmington, NM	382 Road 3100 Aztec, NM 87401	Report to:	THEE	Phone From 1	Fax:	Collected by (print): Collected by (signature):	CHAS PERKINS	Immediately Packed on Ice N Y	Sample 10	THE PROPERTY OF THE PERTY OF TH						F - Filter B - Bioassay r	by: (Signature)	CHAD PERKINS Relinquished by : Isignature)	Relinquished by : (Signature)	



