

From: [Lindsay Dumas](#)
To: [Kelly, Jonathan, EMNRD](#); [Smith, Cory, EMNRD](#)
Cc: [Tammy Jones](#)
Subject: [EXT] Response to SAN JUAN 28-6 UNIT 93 - INC
Date: Monday, January 11, 2021 7:35:30 AM
Attachments: [3-16-2016.png](#)
[5-2-2013.png](#)
[5-8-2009.png](#)
[6-30-2005.png](#)
[8-2-2011.png](#)

Good Morning Cory & Jonathan –

Under the 2008 Pit Rule, thousands of BGT permits were submitted by the previous operator. It is known that there were clerical errors made and some locations were permitted to have a BGT when they in deed did not have a BGT onsite. It is also known that some locations were not permitted to have a BGT and indeed do have BGT's. We remedy these when found by submitting a permit for the BGT when it is discovered.

In this specific case, there was a BGT permitted but no BGT is onsite currently or historically. Prior OCD inspections did not indicate the presence of a BGT as stated by Jonathan Kelly (NMOCD). This location currently has an open top steel AGT. HEC has reviewed our records and have discovered no BGT at this location. A review of Google Earth Maps history of this location (attached) does not show a BGT either.

HEC would like to request Closure of INC# 20210105.JK.2 and BGT Permit based on the fact that a BGT never existed at this location and the permit was submitted by clerical error.

Please let me know if you would like any further information from Hilcorp.

Kind regards,

Lindsay Dumas
Environmental Specialist
Hilcorp Energy – L48 West
Office: 832-839-4585
Mobile: 281-794-9159

From: Tammy Jones
Sent: Wednesday, January 06, 2021 8:13 AM
To: Lindsay Dumas <ldumas@hilcorp.com>; Kurt Hoekstra <khoekstra@hilcorp.com>
Cc: Clayton Hamilton <clhamilton@hilcorp.com>; Kalan Dibble <kdibble@hilcorp.com>; Trevor Coleman <tc Coleman@hilcorp.com>; Etta Trujillo <ettrujillo@hilcorp.com>
Subject: SAN JUAN 28-6 UNIT 93 - INC
Importance: High

Today's Date:	1/6/2021					
Well Name:	SAN JUAN 28-6 UNIT 93	Location:	Sec: 36	TwN: 028N	Rng: 006W	UL: M
API Number:	30.039.07227	Footage:	990' FSL & 1090' FWL			
Operator:	Hilcorp Energy Company	Area/Run/MSO:	13	1301	Ben Olguin	
Meter #:	7257201		Pipeline:	HAR		
INC Number:	20210105.JK.2	Agency:	OCD	Inspector:	Jonathan Kelly	
Type of INC:	Verbal	Photos Required:	Yes	Due Date:	4/5/2021	
Issue of Concern:	C-144 below grade tank registration in well file, no below grade tank on location, will review and send to operator to determine path forward. Location has an open top steel AGT.					

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