

From: [Smith, Cory, ENMRO](#)
To: [Smith, Kelly, Jonathan, ENMRO](#)
Cc: [Cheryl Weston](#)
Subject: RE: [EXTERNAL] HEC locations with C-144 issues from 9/14/2020
Date: Tuesday, February 18, 2021 11:33:00 AM

Kandis,

Per your request below to close the BGT's due to filing error and that no BGT was on this location. OCD Reviewed inspections and inspection photos, and Aerial images OCD agrees that with the data provided that there is/was no BGT at the below locations and the BGT registrations are hereby considered closed with no further sampling etc needed.

If new information shows that there was a BGT on location HEC may be required to perform sampling etc. Please keep this for your records as a Handcopy will not be sent to you.

Thanks,

Cory Smith • Environmental Specialist
Environmental Bureau
ENMRO - Oil Conservation Division
1000 Rio Brazos | Actec, NM 87410
505.334.6178 x115 | Cory.Smith@state.nm.us
<http://www.enmro.state.nm.us/OC/OCD>

From: Kandis Roland <kroland@hilcorp.com>
Sent: Tuesday, January 12, 2021 2:57 PM
To: Kelly, Jonathan, ENMRO <Jonathan.Kelly@state.nm.us>; Smith, Cory, ENMRO <Cory.Smith@state.nm.us>
Cc: Kandis Roland <kroland@hilcorp.com>; Cheryl Weston <cweston@hilcorp.com>
Subject: [EXT] RE: [EXTERNAL] HEC locations with C-144 issues from 9/14/2020

Cory/Jonathan,

BGT permit was filed for the wells listed below by ConocoPhillips in 2008 but no BGT is onsite currently or historically. Prior OCD inspection did not indicate the presence of a BGT as found by Jonathan Kelly.

HEC would like to request C-144 BGT permits be closed has they were submitted by clerical error.

| Well Name | API |
|------------------------|------------|
| San Juan 29-7 Unit 32 | 3003907480 |
| San Juan 29-7 Unit 167 | 3003926061 |
| San Juan 29-7 Unit 32A | 3003922064 |

Thanks,

Kandis Roland
HILCORP ENERGY
San Juan South Regulatory
505.324.5149
kroland@hilcorp.com

From: Kelly, Jonathan, ENMRO [<mailto:Jonathan.Kelly@state.nm.us>]
Sent: Monday, January 11, 2021 10:59 AM
To: Farmington Regulatory Techs <FarmingtonRegulatoryTechs@hilcorp.com>
Cc: Smith, Cory, ENMRO <Cory.Smith@state.nm.us>
Subject: [EXTERNAL] HEC locations with C-144 issues from 9/14/2020

Good afternoon,

I have been performing C-144 reviews while filing inspection photos and closing older compliance issues, which will mean I will be filtering those over to you as time passes and the reviews are done. Please note that any time frame for required action will be from the date submitted and not the noted date of inspection. Except for the reviews performed with the older compliance closures, I will try to clump these by original inspection date.

| Location | Inspection Date | Notes |
|--|-----------------|--|
| [30-039-22209] SAN JUAN 28 7 UNIT #008A and [30-039-30204] SAN JUAN 28 7 UNIT #248F share location | 9/14/2020 | Location has shared below grade tank. C-144 below grade tank registrations in both well files, modification needed for both wells to tie single tank to both wells for existing permits. |
| [30-039-22281] SAN JUAN 28 7 UNIT #030A | 9/14/2020 | Location has 2 below grade tanks, only 1 C-144 below grade tank registration in well file. |
| [30-039-07431] SAN JUAN 28 7 UNIT #008 | 9/14/2020 | Location has 2 below grade tanks, only 1 C-144 below grade tank registration in well file. |
| [30-039-27047] SAN JUAN 28 7 UNIT #246M | 9/14/2020 | No C-144 below grade tank registration in well file. |
| [30-039-01440] SAN JUAN 28 7 UNIT #020 | 9/14/2020 | Location has 2 below grade tanks, only 1 C-144 below grade tank registration in well file. |
| [30-039-07480] SAN JUAN 29 7 UNIT #032 | 9/14/2020 | 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 |
| [30-039-26061] SAN JUAN 29 7 UNIT #167 | 9/14/2020 | 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 |
| [30-039-22411] SAN JUAN 29 7 UNIT #032E | 9/14/2020 | Well file review for BGT Registration found C-141 Final Report indicating that BGT closure sample results were above regulatory standards indicating a release occurred. Only 1 C-144 BGT Permit in well file with no C-144 BGT Closure Report from this indicated BGT closure. Please review and determine what actions HEC will need to take to clean up records in regards to this indicated closure and the missing C-144 Closure. Location has an active BGT. |
| [30-039-22064] SAN JUAN 29 7 UNIT #032A | 9/14/2020 | 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 |

Thank you,

Jonathan D. Kelly
Compliance Officer
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Actec, NM 87410
(505) 320-0701
jonathan.kelly@state.nm.us

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