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 emporary pits, below-grade tanks, and

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.

Proposed Alternative Method Permit or Closure Plan Application

	Type of acti		ow grade tank regist					
	☐ Permit of a pit or proposed alternative method BGT1 Closure ☐ Closure of a pit, below-grade tank, or proposed alternative method							
	Report 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							
			s not relieve the operato or of its responsibility t					
1.		— — — — — — — — — — — — — — — — — — —	or or its responsionity t	o compry with they out	TOT WPPING	euore go verimiente	a addressing a raises, reg.	
Operator:	Hilcorp Ene	rgy Company			OGRI	D #:	372171	
Address:	382 Road 3	100 Aztec.	NM 87410					
Facility or well n	ame: Da	avidson Gas C	om F 1E					
API Number:	30-045-241	13		OCD Permit Numb	er:			
U/L or Qtr/Qtr _	F S	ection 28	Township 28N	Range_	10W	County:	San Juan	
Center of Propos	ed Design: Lat	titude <u>36.636</u>	33	Longitud	le	-107.90429	NAD83	
Surface Owner:	Ederal .	State 🗌 Priva	e 🔲 Tribal Trust or Ir	ndian Allotment				
2.								
Pit: Subsec	tion F, G or J	of 19.15.17.11	NMAC					
Temporary: 🔲 l	Drilling Wo	orkover						
Permanent	Emergency [☐ Cavitation	☐ P&A ☐ Multi-We	ell Fluid Managemen	t	Low Chlorie	de Drilling Fluid 🗌	yes 🗌 no
☐ Lined ☐ Uı	nlined Liner t	ype: Thicknes	smil 🔲	LLDPE HDPE	☐ PVC	Other		
☐ String-Reinfo	rced							
-		actory Oth	er	Volume:		bbl Dimens	ions: L x W	x D
3. ⊠ Below-grade	tank. Subse	ction Lof 19.1	5 17 11 NMAC					
			of fluid:Pr	oduced Water				
			<u> 11</u>				_	
			n 🛛 Visible sidewal		nd auton	natic overflow ch	ut off	
•			dewalls only \(\square\) Othe					
			nil					
Linei type. Tinc.	KIIESS	I		Other	Ullspec	<u>meu</u>		
4. Alternative N	Nothod:							
•		at is magninad	Exceptions must be s	uhmittad to the Conta	. Eo Env	rimonmontal Dumos	ov office for consider	ention of annuoval
Submittal of all e	xception reque	st is required.	Exceptions must be s	uonnitied to the Santa	i re Eliv	monnentai Burea	du office foi considera	ation of approval.
5.	tion D of 10 1	5 17 11 NIM A	7 (Amplias to name su or		a and b	alam anada tanka)	
			C (Applies to permaner			_		1.1
institution or chu	_	, two strands o	f barbed wire at top (R	хедиігеа іј іосатед жі	ının 100	ю <i>јее</i> т ој а регта	тені restaence, schoo	эі, поѕриаі,
☐ Four foot heig	ght, four strand	s of barbed wi	e evenly spaced between	een one and four feet				
Alternate. Ple	ease specify							

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)	
7.	
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	
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: Variance(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 accept material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	otable 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 ☑ NA
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 ☐ NA
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. (Does not apply to below grade tanks) - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
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 Society; Topographic map 	☐ Yes ☐ No
Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map	☐ Yes ☐ No
Below Grade Tanks	
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured	☐ Yes ⊠ No
from the ordinary high-water mark). - 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; NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site 	☐ Yes ⊠ No
<u>Temporary Pit using Low Chloride Drilling Fluid</u> (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, 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 application.	☐ Yes ☐ No
- 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
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the 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 19.15.17.10 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	ocuments are 9 NMAC 9.15.17.9 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 dattached. □ 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 1 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 description is the subsection of the following items must be attached to the application.	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				
Proposed Closure: 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 Fl	uid Management Pit			
Alternative	ara management r			
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				
Alternative Closure Method				
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be a closure plan. Please indicate, by a check mark in the box, that the documents are attached.	attached to the			
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 source material are				
provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. P	lease refer to			
19.15.17.10 NMAC for guidance.				
Ground water is less than 25 feet below the bottom of the buried waste.	Yes No			
- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	□ NA			
Ground water is between 25-50 feet below the bottom of the buried waste	☐ Yes ☐ No			
- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	□ NA			
Ground water is more than 100 feet below the bottom of the buried waste.	Yes No			
- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	□ NA			
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa	☐ Yes ☐ No			
lake (measured from the ordinary high-water mark).	103 110			
- Topographic map; Visual inspection (certification) of the proposed site				
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.	☐ Yes ☐ No			
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image				
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence	☐ Yes ☐ No			
at the time of initial application.				
- NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site				
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:	y; Written approval obtained from the municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine Written confirmation or verification or map from the NM I	EMNRD-Mining and Mineral Division	☐ Yes ☐ No
Within an unstable area. - Engineering measures incorporated into the design; NM Bu Society; Topographic map	Bureau of Geology & Mineral Resources; USGS; NM Geolog	
Within a 100-year floodplain.		Yes No
- FEMA map		☐ Yes ☐ No
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instruction by a check mark in the box, that the documents are attached. □ Siting Criteria Compliance Demonstrations - based upon the appropriate □ Construction/Design Plan of Burial Trench (if applicable) b □ Construction/Design Plan of Temporary Pit (for in-place bur □ Protocols and Procedures - based upon the appropriate required □ Confirmation Sampling Plan (if applicable) - based upon the □ Waste Material Sampling Plan - based upon the appropriate □ Disposal Facility Name and Permit Number (for liquids, dril □ Soil Cover Design - based upon the appropriate requirement □ Re-vegetation Plan - based upon the appropriate requirement □ Site Reclamation Plan - based upon the appropriate requirement □ Site Reclamation Plan - based upon the appropriate requirement □ Site Reclamation Plan - based upon the appropriate requirement □ Site Reclamation Plan - based upon the appropriate requirement □ Site Reclamation Plan - based upon the appropriate requirement □ Site Reclamation Plan - based upon the appropriate requirement □ Site Reclamation Plan - based upon the appropriate requirement □ Site Reclamation Plan - based upon the appropriate requirement □ Site Reclamation Plan - based upon the appropriate requirement □ Site Reclamation Plan - based upon the appropriate requirement □ Site Reclamation Plan - based upon the appropriate requirement □ Site Reclamation Plan - based upon the appropriate requirement □ Site Reclamation Plan - based upon the appropriate requirement □ Site Reclamation Plan - based upon the appropriate requirement □ Site Reclamation Plan - based upon the appropriate Plan - Site Reclamation Plan - based upon the appropriate Plan - Site Reclamation Plan - based upon the appropriate Plan - Site Reclamation Plan - S	e appropriate requirements of 19.15.17.10 NMAC erequirements of Subsection E of 19.15.17.13 NMAC based upon the appropriate requirements of Subsection K of Farial of a drying pad) - based upon the appropriate requirement irements of 19.15.17.13 NMAC expression appropriate requirements of 19.15.17.13 NMAC requirements of 19.15.17.13 NMAC elling fluids and drill cuttings or in case on-site closure standarts of Subsection H of 19.15.17.13 NMAC hts of Subsection H of 19.15.17.13 NMAC	19.15.17.11 NMAC nts of 19.15.17.11 NMAC
17. Operator Application Certification:		
I hereby certify that the information submitted with this application	•	
Name (Print):	Title:	
Signature:	Date:	
e-mail address:	Telephone:	
18. OCD Approval: Permit Application (including closure plan)	Report Closure Plan (only) OCD Conditions (see attachn	nent)
OCD Representative Signature: Jaclyn Burdine	Approval Date:	07/28/2022
Title: Environmental Specialist-A	OCD Permit Number: BGT1	
19. Closure Report (required within 60 days of closure completion) Instructions: Operators are required to obtain an approved closu The closure report is required to be submitted to the division with section of the form until an approved closure plan has been obtain	ure plan prior to implementing any closure activities and su hin 60 days of the completion of the closure activities. Plea	se do not complete this
20.		
Closure Method: ☐ Waste Excavation and Removal ☐ On-Site Closure Method ☐ If different from approved plan, please explain.	d	Closed-loop systems only)

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.

ame (Print): Amanda Walker Title: Operations/Regulatory Technician – Sr

Signature: _______ Date: <u>7/27/2022</u>

e-mail address: <u>mwalker@hilcorp.com</u> <u>Telephone: (346) 237-2177</u>

Hilcorp Energy Company San Juan Basin Below Grade Tank Closure Report

Lease Name: Davidson Gas Com F 1E

API No.: 30-045-24113

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)

Mandi Walker

From: Mandi Walker

Sent: Thursday, June 2, 2022 10:49 AM

To: Abiodun Adeloye; Brandon Sinclair; Clara Cardoza; Eufracio Trujillo; Kandis Roland;

Kate Kaufman; Keri Hutchins; I1thomas@blm.gov; Mandi Walker; Ryan Joyner; Victoria

Venegas

Cc: Kelly Davidson; Shad Brown

Subject: 72 hr BGT Closure Notice - Davidson Gas Com F 1E (3004524113)

Attachments: Davidson Gas Com F 1E BGT Approved.pdf

Follow Up Flag: Follow up

Due By: Thursday, July 7, 2022 3:00 PM

Flag Status: Flagged

The subject well has a below-grade tank that will be permanently removed. The BGT Permit is attached. Please contact me at any time if you have any questions or concerns.

Well Name: Davidson Gas Com F 1E

API#: 30-045-24113 Location: F, 28, 28N, 10W

Footages: 1520' FNL & 1520' FWL

Operator: HEC Surface Owner: BLM

Scheduled Date & Time of Start: Tuesday June 7th @ 11:30 am

Please Note Required Photos for Closure

Well site placard

Photos of the BGT prior to closure

The sample location or, more preferred, photos of actual sample collection

Final state of the area after closure.

Photos will require captioning including direction of photo, date and time of photo and a description of the image contents.

Mandi Walker

San Juan North/South (6,7) Regulatory Technician Hilcorp Energy 346.237.2177 mwalker@hilcorp.com



















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1625 N. French Dr., Hobbs, NM 88240
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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

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible	Party Hi	lcorp Energy Com	pany		OGRID	372171		
Contact Nam	ne Aman	da Walker			Contact Telephone (346) 237-2177			
Contact email mwalker@hilcorp.com					Incident #	(assigned by OCD)		
Contact mail	ing address	382 Road 3100	Aztec NM 8741	10				
			Location	of R	elease So	ource		
Latitude <u>36</u>	6.63633		Longitud		-107.904 grees to 5 decim			
Site Name D	avidson Gas	s Com F 1E			Site Type	Gas Well		
Date Release	Discovered	N/A			API# (if app	plicable) 30-045-24113		
Unit Letter	Section	Township	Range		Coun	nty		
F	28	28N	10W	San Jua		<u> </u>		
	Materia	ıl(s) Released (Select al	Nature and			Release c justification for the volumes provided below)		
Crude Oil	1	Volume Release	d (bbls)			Volume Recovered (bbls)		
Produced	Water	Volume Release	d (bbls)			Volume Recovered (bbls)		
		Is the concentrate produced water	ion of dissolved cl >10,000 mg/l?	hloride	in the	Yes No		
Condensa	nte	Volume Release				Volume Recovered (bbls)		
☐ Natural G	Gas	Volume Release	d (Mcf)			Volume Recovered (Mcf)		
Other (describe) Volume/Weight Released (provide unit		e units)	ts) Volume/Weight Recovered (provide units)					
Cause of Rele No release wa		ed during the BGT	Closure.			<u> </u>		

Received by OCD: 7/27/2022 7:23:20 AM Form C-141 State of New Mexico Page 2 Oil Conservation Division

	Page 13 of 2	4
Incident ID		
District RP		
Facility ID		
Amuliantian ID		

Was this a major release as defined by 19.15.29.7(A) NMAC?	If YES, for what reason(s) does the responsible party consider this a major release?					
☐ 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.					
	we been contained via the use of berms or dikes, absorbent pads, or other containment devices.					
	ecoverable materials have been removed and managed appropriately.					
If all the actions described	d above have <u>not</u> been undertaken, explain why:					
has begun, please attach a	IAC the responsible party may commence remediation immediately after discovery of a release. If remediation 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.					
regulations all operators are public health or the environment failed to adequately investigations.	rmation given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and required to report and/or file certain release notifications and perform corrective actions for releases which may endanger ment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have at and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In f a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws					
Printed Name: Amanda	a Walker Title: Operations/Regulatory Technician – Sr.					
Signature:	Date: <u>7/27/2022</u>					
Email mwalker@hilcorp.o	<u>Com</u> Telephone: (346) 237-2177					
OCD Only						
	Date:					
Received by:	Date:					



Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87109 TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

June 15, 2022

Fasho Trujillo HILCORP ENERGY PO Box 4700 Farmington, NM 87499

TEL: (505) 564-0733

FAX:

RE: Davidson Gas Com F 1E BGT Closure OrderNo.: 2206447

Dear Fasho Trujillo:

Hall Environmental Analysis Laboratory received 1 sample(s) on 6/8/2022 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results, it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0901

Sincerely,

Andy Freeman

Laboratory Manager

Indes

4901 Hawkins NE

Albuquerque, NM 87109

CLIENT: HILCORP ENERGY

Analytical Report

Lab Order **2206447**Date Reported: **6/15/2022**

Hall Environmental Analysis Laboratory, Inc.

Client Sample ID: BGT 5 Point

Project: Davidson Gas Com F 1E BGT Closure Collection Date: 6/7/2022 11:40:00 AM

Lab ID: 2206447-001 Matrix: SOIL Received Date: 6/8/2022 7:20:00 AM

Analyses	Result	RL Qu	al Units	DF	Date Analyzed
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS					Analyst: JME
Diesel Range Organics (DRO)	ND	14	mg/Kg	1	6/10/2022 7:48:24 PM
Motor Oil Range Organics (MRO)	ND	48	mg/Kg	1	6/10/2022 7:48:24 PM
Surr: DNOP	96.3	51.1-141	%Rec	1	6/10/2022 7:48:24 PM
EPA METHOD 8015D: GASOLINE RANGE					Analyst: BRM
Gasoline Range Organics (GRO)	ND	4.7	mg/Kg	1	6/10/2022 8:42:51 AM
Surr: BFB	89.5	37.7-212	%Rec	1	6/10/2022 8:42:51 AM
EPA METHOD 8021B: VOLATILES					Analyst: BRM
Benzene	ND	0.024	mg/Kg	1	6/10/2022 8:42:51 AM
Toluene	ND	0.047	mg/Kg	1	6/10/2022 8:42:51 AM
Ethylbenzene	ND	0.047	mg/Kg	1	6/10/2022 8:42:51 AM
Xylenes, Total	ND	0.095	mg/Kg	1	6/10/2022 8:42:51 AM
Surr: 4-Bromofluorobenzene	89.3	70-130	%Rec	1	6/10/2022 8:42:51 AM
EPA METHOD 300.0: ANIONS					Analyst: JMT
Chloride	ND	60	mg/Kg	20	6/14/2022 12:52:11 AM

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- S % Recovery outside of range due to dilution or matrix interference
- B Analyte detected in the associated Method Blank
- E Estimated value
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Limit

Page 1 of 5

Hall Environmental Analysis Laboratory, Inc.

WO#: **2206447 15-Jun-22**

Client: HILCORP ENERGY

Project: Davidson Gas Com F 1E BGT Closure

Sample ID: MB-68083 SampType: mblk TestCode: EPA Method 300.0: Anions

Client ID: PBS Batch ID: 68083 RunNo: 88683

Prep Date: 6/13/2022 Analysis Date: 6/13/2022 SeqNo: 3148927 Units: mg/Kg

Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual

Chloride ND 1.5

Sample ID: LCS-68083 SampType: Ics TestCode: EPA Method 300.0: Anions

Client ID: LCSS Batch ID: 68083 RunNo: 88683

Prep Date: 6/13/2022 Analysis Date: 6/13/2022 SeqNo: 3148928 Units: mg/Kg

Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual

Chloride 15 1.5 15.00 0 99.9 90 110

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- S % Recovery outside of range due to dilution or matrix interference
- B Analyte detected in the associated Method Blank
- E Estimated value
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Limit

Page 2 of 5

Hall Environmental Analysis Laboratory, Inc.

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2206447 15-Jun-22

WO#:

Client: HILCORP ENERGY

Project: Davidson Gas Com F 1E BGT Closure

Sample ID: MB-68018	SampT	ype: MB	LK	TestCode: EPA Method 8015M/D: Diesel Range Organics								
Client ID: PBS	Batch	1D: 680	18	F	RunNo: 88	3655						
Prep Date: 6/9/2022	Analysis D	ate: 6/ 1	10/2022	9	SeqNo: 31	146644	Units: mg/Kg					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual		
Diesel Range Organics (DRO)	ND	15										
Motor Oil Range Organics (MRO)	ND	50										
Surr: DNOP	9.9		10.00		99.2	51.1	141					

Sample ID: LCS-68018 SampType: LCS TestCode: EPA Method 8015M/D: Diesel Range Organics Client ID: LCSS Batch ID: 68018 RunNo: 88655 Prep Date: 6/9/2022 Analysis Date: 6/10/2022 SeqNo: 3146647 Units: mg/Kg SPK value SPK Ref Val %REC %RPD Analyte PQL LowLimit HighLimit **RPDLimit** Qual Diesel Range Organics (DRO) 15 0 90.2 45 50.00 64.4 127

84.5

51.1

141

5.000

Oua	lifi	ers	:

Surr: DNOP

Value exceeds Maximum Contaminant Level.

D Sample Diluted Due to Matrix

H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

PQL Practical Quantitative Limit

S % Recovery outside of range due to dilution or matrix interference

B Analyte detected in the associated Method Blank

E Estimated value

J Analyte detected below quantitation limits

P Sample pH Not In Range

RL Reporting Limit

Page 3 of 5

Hall Environmental Analysis Laboratory, Inc.

WO#: 2206447 15-Jun-22

Client: HILCORP ENERGY

Project: Davidson Gas Com F 1E BGT Closure

Sample ID: Ics-67997 SampType: LCS TestCode: EPA Method 8015D: Gasoline Range Client ID: LCSS Batch ID: 67997 RunNo: 88620 Units: mg/Kg Prep Date: 6/8/2022 Analysis Date: 6/9/2022 SeqNo: 3145323 PQL SPK value SPK Ref Val %REC HighLimit %RPD **RPDLimit** Analyte Result LowLimit Qual Gasoline Range Organics (GRO) 26 5.0 25.00 0 103 72.3 137 Surr: BFB 2000 1000 203 37.7 212

Sample ID: mb-67997 SampType: MBLK TestCode: EPA Method 8015D: Gasoline Range Client ID: PBS Batch ID: 67997 RunNo: 88620 Prep Date: Analysis Date: 6/9/2022 SeqNo: 3145325 6/8/2022 Units: mg/Kg Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD **RPDLimit** Qual ND

Gasoline Range Organics (GRO) Surr: BFB

5.0 940

1000

94.2

37.7

212

Qualifiers:

Value exceeds Maximum Contaminant Level

D Sample Diluted Due to Matrix

Н Holding times for preparation or analysis exceeded

Not Detected at the Reporting Limit

PQL Practical Quanitative Limit

% Recovery outside of range due to dilution or matrix interference

Analyte detected in the associated Method Blank

Estimated value

Analyte detected below quantitation limits

Sample pH Not In Range

RLReporting Limit Page 4 of 5

Hall Environmental Analysis Laboratory, Inc.

WO#: **2206447**

15-Jun-22

Client: HILCORP ENERGY

Project: Davidson Gas Com F 1E BGT Closure

Sample ID: LCS-67997	Samp	Гуре: LC	s	TestCode: EPA Method 8021B: Volatiles								
Client ID: LCSS	Batcl	h ID: 67 9	997	F	RunNo: 88	3620						
Prep Date: 6/8/2022	Analysis [Date: 6/ 9	9/2022	9	SeqNo: 31	145367	Units: mg/K	g				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual		
Benzene	0.83	0.025	1.000	0	82.5	80	120					
Toluene	0.86	0.050	1.000	0	86.0	80	120					
Ethylbenzene	0.87	0.050	1.000	0	87.0	80	120					
Xylenes, Total	2.6 0.10 3.00		3.000	0 87.2		80	120					
Surr: 4-Bromofluorobenzene	0.95		1.000	94.7 70			130					

Sample ID: mb-67997	Samp ⁻	Гуре: МЕ	BLK	TestCode: EPA Method 8021B: Volatiles									
Client ID: PBS	Batc	h ID: 679	997	F	RunNo: 8								
Prep Date: 6/8/2022	Analysis [Date: 6/ 9	9/2022	9	SeqNo: 3	145369	Units: mg/Kg						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual			
Benzene	ND	0.025											
Toluene	ND	0.050											
Ethylbenzene	ND	0.050											
Xylenes, Total													
Surr: 4-Bromofluorobenzene	0.93		1.000		93.0	70	130						

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
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- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- S % Recovery outside of range due to dilution or matrix interference
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- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Limit

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Hall Environmental Analysis Laboratory 4901 Hawkins NE

Sample Log-In Check List

Albuquerque, NM 87109 TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

Client Name:	HILCORP E	ENERGY	Work	Order Numl	ber: 220	6447			RcptNo	: 1
Received By:	Cheyenne	Cason	6/8/202	2 7:20:00 A	М		Chul	/		
Completed By:	Desiree D	ominguez	6/8/202	2 1:27:26 P	М		D	≥		
Reviewed By:	DAD	6/8/22								
Chain of Cus	stody									
1. Is Chain of C	ustody comp	lete?			Yes	✓	No		Not Present	
2. How was the	sample deliv	ered?			<u>Cou</u>	<u>rier</u>				
<u>Log In</u>						_				
Was an atten	npt made to c	ool the samp	es?		Yes	✓	No	لــا	NA 🗌	
4. Were all sam	ples received	at a tempera	ture of >0°C t	o 6.0°C	Yes	✓	No		NA 🗀	
5. Sample(s) in	proper contai	ner(s)?			Yes	✓	No			
6. Sufficient san	nple volume f	or indicated te	st(s)?		Yes	V	No			
7. Are samples	(except VOA	and ONG) pro	perly preserve	d?	Yes	V	No			
8. Was preserva	ative added to	bottles?			Yes		No	V	NA 🗆	
9. Received at le	east 1 vial wit	h headspace	<1/4" for AQ V	OA?	Yes		No		NA 🗹	~~~
10. Were any sai	mple containe	rs received b	roken?		Yes		No	\checkmark		_(
								_	# of preserved bottles shecked	6/8/27
11. Does paperwo (Note discrep-					Yes	\checkmark	No		for pH:	r >12 unless noted)
12. Are matrices					Yes	✓	No		Adjusted?	1 12 dilicus fiology
13. Is it clear wha					Yes	V	No			
14. Were all holdi					Yes	✓	No		Checked by:	
(If no, notify c	ustomer for a	uthorization.)							L	
Special Handi	ling (if app	licable)								
15. Was client no	otified of all di	screpancies v	vith this order?		Yes		No		NA 🗹	- 1
Person	Notified:			Date:		idia interiorena	COLUMN TO THE PROPERTY OF THE	***************************************		į
By Who	om:			Via:	eM	ail 🗌] Phone [Fax	☐ In Person	
Regard	ling:				**************************************	***********				j I
Client I	nstructions:									
16. Additional re	marks:									
17. Cooler Info		,	•							
Cooler No		Condition	Seal Intact	Seal No	Seal D	ate	Signed E	Зу		
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If necessary, sambles submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.	<i>પીત્ર</i> ા/૧૫૪૫	Time:	1453 1553	Time:												11:40	Time	□ EDD (Type)	AC	QA/QC Package: Chuj illoCh, lcmb.com ☐ Standard ☐ Level 4 (Full Validation)	ır Fax#:			Mailing Address:		Him	Chain-of-Custody Record
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HALL ENVIRONMENTAL ANALYSIS LABORATORY

Released to Imaging: 7/28/2022 4:25:21 PM

TAKES 6-22-22

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District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720 District II

811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720 District III

1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. **Santa Fe, NM 87505**

CONDITIONS

Action 128969

CONDITIONS

Operator:	OGRID:
HILCORP ENERGY COMPANY	372171
1111 Travis Street	Action Number:
Houston, TX 77002	128969
	Action Type:
	[C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By		Condition Date
jburdine	None	7/28/2022