

Santa Fe Main Office
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State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

For State Use Only:
Registration #

Form C-137 EZ
Revised October 11, 2022

File via OCD Permitting

REGISTRATION/ FINAL CLOSURE REPORT FOR SMALL LANDFARM

Section 7 of 19.15.36 NMAC defines a small landfarm as a centralized landfarm of two acres or less that has a total capacity of 2000 cubic yards or less in a single lift of eight inches or less, remains active for a maximum of three years from the date of its registration and that receives only petroleum hydrocarbon-contaminated soils (excluding drill cuttings) that are exempt or non-hazardous waste. The operator shall operate only one active small landfarm per governmental section at any time.

GENERAL INFORMATION

1. ☒ Small Landfarm Registration ☐ Small Landfarm Final Closure Report*
(*Must be submitted within three years from the registration date)

2. Operator: Hilcorp Energy Company

Address: 1111 Travis Street, Houston, TX 77002

Contact Person: Mitch Killough

Phone: 713-757-5247

3. Location: SW /4 SE /4 Section 25 Township 32N Range 12W

REGISTRATION

1. As operator, are you the surface estate owner of the proposed site? ☐ Yes ☒ No If no, please attach a certification statement that demonstrates a written agreement is established with the surface estate owner authorizing the use of the site for the proposed small landfarm.

2. Will the proposed small landfarm comply with the siting requirements of Subsections A and B of 19.15.36.13 NMAC?
☒ Yes ☐ No

A. Depth to ground water.

- No small landfarm shall be located where ground water is less than 50 feet below the lowest elevation at which the operator will place oil field waste.

B. No surface waste management facility shall be located:

- within 200 feet of a watercourse, lakebed, sinkhole or playa lake;
- within an existing wellhead protection area or 100-year floodplain;
- within, or within 500 feet of, a wetland;
- within the area overlying a subsurface mine;
- within 500 feet from the nearest permanent residence, school, hospital, institution or church in existence at the time of initial application; or
- within an unstable area, unless the operator demonstrates that engineering measures have been incorporated into the surface waste management facility design to ensure that the surface waste management facility's integrity will not be compromised.

3. Attach a plat and topographic map showing the small landfarm's location in relation to governmental surveys (quarter-quarter section, township and range); highways or roads giving access to the small landfarm site; watercourses; fresh water sources, including wells and springs; oil and gas wells or other production facilities; and inhabited buildings within one mile of the site's perimeter.

Based on the information provided with this submittal, registration of a small landfarm can only be granted if the operator complies with the following understandings and conditions:

- The operator shall operate only one active small landfarm per governmental section at any time. No small landfarm shall be located more than one mile from the operator's nearest oil or gas well or other production facility.
- The operator shall accept only exempt or non-hazardous wastes consisting of soils (excluding drill cuttings) generated as a result of accidental releases from production operations, that are predominantly contaminated by petroleum hydrocarbons, do not contain free liquids, would pass the paint filter test and where testing shows chloride concentrations are 500 mg/kg or below.
- The operator shall berm the landfarm to prevent rainwater run-on and run-off.
- The operator shall post a sign at the site readable from a distance of 50 feet and listing the operator's name; small landfarm registration number; location by unit letter, section, township and range; expiration date; and an emergency contact telephone number.
- The operator shall spread and disk contaminated soils in a single eight inch or less lift within 72 hours of receipt. The operator shall conduct treatment zone monitoring to ensure that the TPH concentration, as determined by EPA SW-846 method

8015M or EPA method 418.1 or other EPA method approved by the division, does not exceed 2500 mg/kg; and that the chloride concentration, as determined by EPA method 300.1, does not exceed 500 mg/kg. The operator shall treat soils by disking at least once a month and by watering and adding bioremediation enhancing materials when needed.

- The operator shall maintain records reflecting the generator, the location of origin, the volume and type of oil field waste, the date of acceptance and the hauling company for each load of oil field waste received. The division shall post on its website each small landfarm's location, operator and registration date. In addition, the operator shall maintain records of the small landfarm's remediation activities in a form readily accessible for division inspection. The operator shall maintain all records for five years following the small landfarm's closure.

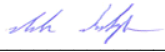
- The operator shall submit a final closure report on a form C-137 EZ, together with photographs of the closed site, to the environmental bureau in the division's Santa Fe office.

CERTIFICATION

I hereby certify that the information submitted with this registration is true, accurate and complete to the best of my knowledge and belief and agree to the understandings and conditions of this registration.

Name: **Mitch Killough**

Title: **Environmental Specialist**

Signature: 

Date: **1/2/2025**

E-mail Address: **mkillough@hilcorp.com**

OCD REGISTRATION: ☐ Approved. Date : _____ ☐ Denied. Date: _____

Comments: _____

OCD Representative Signature: _____

Title: _____ **OCD Registration Number:** _____

FINAL CLOSURE REPORT

Were the landfarmed soils able to achieve the closure performance standards, listed below, within three years from the registration date? ☐ Yes ☐ No (Please provide laboratory analytical results)

- benzene, as determined by EPA SW-846 method 8021 B or 8260B, shall not exceed 0.2 mg/kg;
- Total BTEX, as determined by EPA SW-846 method 8021 B or 8260B, shall not exceed 50 mg/kg;
- TPH, as determined by EPA SW-846 method 418.1 or other EPA method approved by the division, shall not exceed 2500 mg/kg; the GRO and DRO combined fraction, as determined by EPA SW-846 method 8015M, shall not exceed 500 mg/kg; and
- chlorides, as determined by EPA method 300.1, shall not exceed 500 mg/kg.

If yes, were the additional closure requirements listed below satisfied? ☐ Yes ☐ No (Please provide photos)

- The operator shall re-vegetate soils remediated to the closure performance standards if left in place in accordance with Paragraph (6) of Subsection A of 19.15.36.18 NMAC.
- If the operator returns remediated soils to the original site, or with division permission, recycles them, re-vegetate the cell filled in with native soil to the standards in Paragraph (6) of Subsection A of 19.15.36.18 NMAC;
- The operator shall remove berms on the small landfarm and buildings, fences, roads and equipment; and
- The operator shall clean up the site and collect one vadose zone soil sample from three to five feet below the middle of the treatment zone, or in an area where liquids may have collected due to rainfall events; the vadose zone soil sample shall be collected and analyzed using the methods specified above for TPH, BTEX and chlorides.

If no, were the landfarmed soils that have not or cannot be remediated to the closure performance standards within three years removed to a division-approved surface waste management facility, and the cell filled in with native soil to the standards in Paragraph (6) of Subsection A of 19.15.36.18 NMAC and re-vegetated? ☐ Yes ☐ No (Please provide photos)

CERTIFICATION

I hereby certify that the information submitted with this final closure report is true, accurate and complete to the best of my knowledge and belief.

Name: _____

Title: _____

Signature: _____

Date: _____

E-mail Address: _____

OCD CLOSURE REVIEW: ☐ Closure Approved. Date : _____ ☐ Closure Denied. Date: _____

Comments: _____

OCD Representative Signature: _____

Title: _____ **OCD Registration Number:** _____



January 16, 2025

Hilcorp Energy Company

1111 Travis Street
Houston, Texas 77002

Re: Small Landfarm Work Plan
Moore LS 6B
San Juan County, New Mexico
Hilcorp Energy Company

To Whom it May Concern:

Ensolum, LLC (Ensolum), on behalf of Hilcorp Energy Company (Hilcorp), presents this *Small Landfarm Work Plan* summarizing the proposed activities to be performed at the Moore LS 6B (API # 30-045-30564) well pad (Site). The Site is located on private surface in Unit O, Section 25, Township 32 North, Range 12 West, rural San Juan County, New Mexico (Figure 1). Landowner approval for the small landfarm is attached as Appendix A.

As defined in Title 19, Chapter 15, Part 36, Section 7 (19.15.36.7) of the New Mexico Administrative Code (NMAC), a small landfarm cannot exceed 2 acres in size and has a total capacity of 2,000 cubic yards or less of soil. Hilcorp has identified the Site to have sufficient space to construct a small landfarm. A plat map of the landfarm is attached as Appendix B. The proposed small landfarm will be used to treat petroleum-hydrocarbon impacted soil originating from Hilcorp-operated facilities that are classified as exempt or non-hazardous waste by the New Mexico Oil Conservation Division (NMOCD).

NMOCD SMALL LANDFARM SITING CRITERIA

In accordance with 19.15.36.16 NMAC, the following siting requirements presented in Subsections A and B of 19.15.36.13 apply to the small landfarm location at the Site:

- No small landfarm shall be located:
 - where groundwater is less than 50 feet below ground surface (bgs) of the lowest elevation of the proposed small landfarm;
 - within 200 feet of a watercourse, lakebed, sinkhole, or playa lake;
 - within an existing wellhead protection area or 100-year floodplain;
 - within 500 feet of a wetland;
 - within the area overlying a subsurface mine;
 - within 500 feet from the nearest permanent residence, school, hospital, institution or church in existence at the time of initial application; or
 - within an unstable area.

Based on the siting for the proposed small landfarm, the proposed location meets the applicable siting requirements of the regulation. Figures 1 through 9 present siting information and applicable receptors in the vicinity of the Site as required by Subsections A and B of 19.15.36.13 NMAC.

SMALL LANDFARM CONSTRUCTION AND OPERATIONAL REQUIREMENTS

As specified in Subsections B, C, and D of 19.15.36.16 NMAC, the following construction and operational requirements will be followed at the Site:

- The landfarm cannot exceed a maximum size of 2 acres;
- The landfarm can remain active for a maximum period of three years from the date of its registration and can only receive petroleum hydrocarbon contaminated soils (excluding drill cuttings) that are exempt or non-hazardous waste;
- Berms must be constructed around the landfarm perimeter to prevent the run-on and run-off of rainwater.
- A sign must be posted within 50 feet of the landfarm that includes the operator's name, landfarm registration number, location by unit letter, township and range, permit expiration date, and emergency contact telephone number;
- Soil must be placed in a single lift of 8 inches or less, not to exceed 2,000 cubic yards of soil;
- No small landfarm can accept soil with chloride concentrations greater than 500 milligrams per kilogram (mg/kg);
- Soil must not contain free liquids;
- The operator must spread and disk contaminated soil within 72 hours of receipt;
- The operator must treat soil by disking at least once a month and by watering and adding bioremediation enhancing materials when needed;
- The operator must maintain records reflecting the generator, location of soil origin, volume and type of oilfield waste, date of acceptance, and hauling company for each load of oilfield waste received;
- The operator must maintain records of the small landfarm's remediation activities in a form readily accessible for division inspection and must maintain records for five years following the landfarm's closure.

SMALL LANDFARM CLOSURE

As specified in Subsection E of 19.15.36.16 NMAC, the closure performance standards for the Site will be as follows:

- **Benzene** as determined by Environmental Protection Agency (EPA) Methods 8021B or 8260B: 0.2 mg/kg.
- **Total benzene, toluene, ethylbenzene, and xylenes (BTEX)** as determined by EPA Methods 8021B or 8260B: 50 mg/kg.
- **Total Petroleum Hydrocarbons (TPH)**, as determined by EPA Method 418.1 or the sum of gasoline range organics (GRO), diesel range organics (DRO), and motor oil range organics (MRO) as determined by EPA Method 8015M: 2,500 mg/kg.

- **TPH-GRO and DRO** combined fraction as determined by EPA Method 8015M: 500 mg/kg.
- **Chloride** as determined by EPA Method 300.1: 500 mg/kg.

In order to achieve closure, treated soil will be assessed by collecting one composite soil sample, consisting of four discrete samples from the small landfarm, for laboratory analysis. If the analytical results indicate the treated soil is compliant with the above closure performance standards, the operator may return the soil to the original generation site, leave the treated soil in place at the small landfarm, or with prior NMOCD approval, dispose or reuse the treated soil in an alternative manner. If soil cannot be remediated to the above standards within three years after the registration date, the operator must remove contaminated soil from the landfarm and properly dispose of it at a permitted landfill, unless the division authorizes a specific alternative disposition.

Upon closure, any berms, buildings, fences, roads, and equipment associated with the small landfarm must be removed. Once cleared, the operator must collect one vadose zone soil sample from 3 feet to 5 feet below the middle of the treatment zone, or in an area where liquids may have collected due to rainfall events, to be analyzed for TPH, BTEX, and chloride by the methods described above. Additionally, the landfarm area must be revegetated in accordance with Paragraph 6, Subsection A of 19.15.36.18 NMAC. If soil is removed, the landfarm area must be filled in with native soil prior to revegetation activities. Lastly, Hilcorp will submit a final closure report on NMOCD Form C-137 EZ, together with photographs of the closed Site, to the NMOCD.

We appreciate the opportunity to provide this work plan to Hilcorp. If you should have any questions or comments regarding this document, please contact the undersigned.

Sincerely,

Ensolum, LLC



Stuart Hyde
Senior Managing Geologist
(970) 903-1607
shyde@ensolum.com

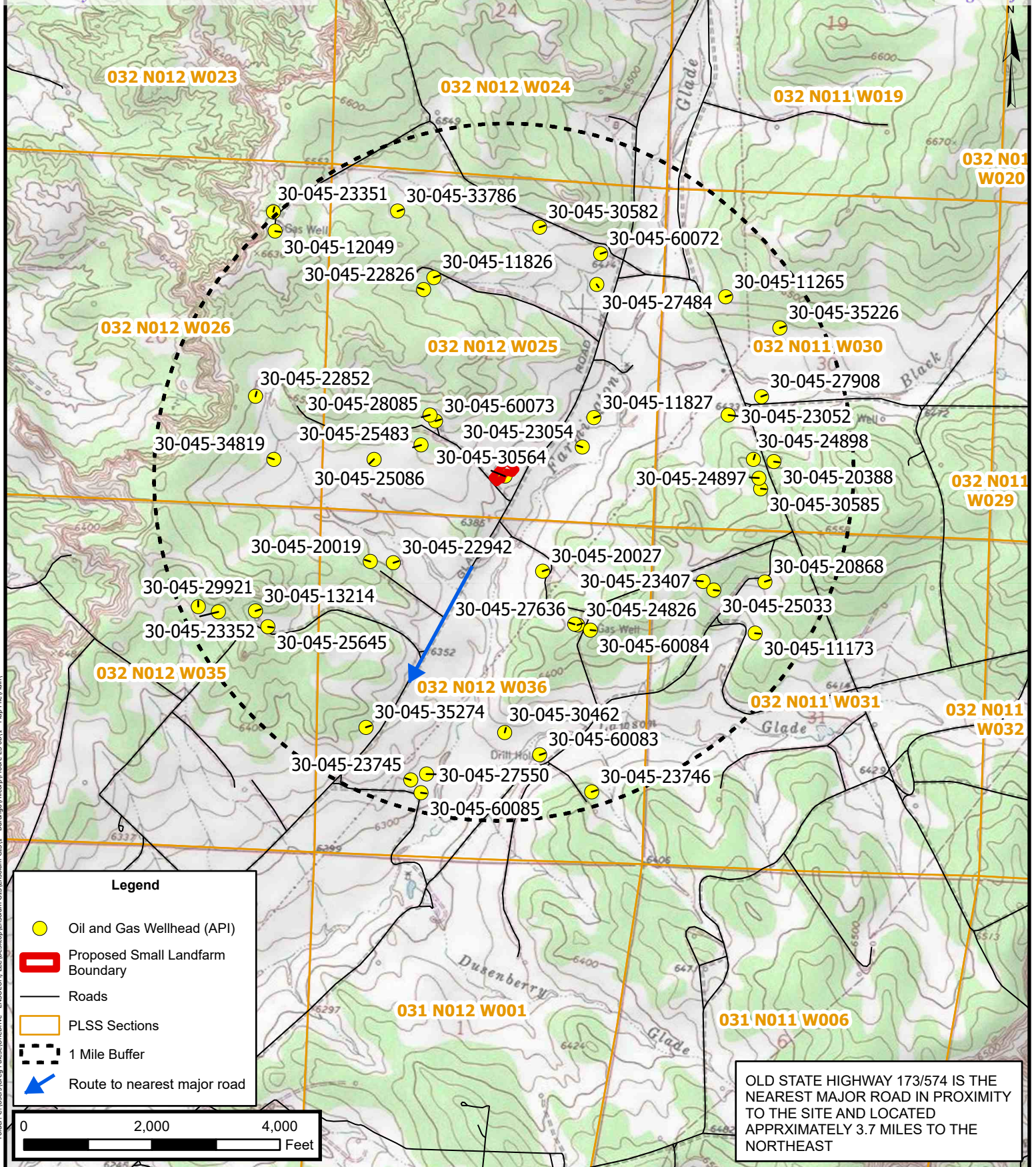
Attachments:

- Figure 1: Site Map
- Figure 2: Proximity to Watercourse, Lakebed, Sinkhole, or Playa Lake
- Figure 3: Proximity to 100-Year Floodplain
- Figure 4: Proximity to Wetlands
- Figure 5: Proximity to Subsurface Mine
- Figure 6: Proximity to Permanent Residence, School, Hospital, Institution or Church
- Figure 7: Proximity to Unstable Area
- Figure 7A: Proximity to Unstable Area – Seismic
- Figure 7B: Proximity to Unstable Area – Faults
- Figure 8: Proximity to Wellhead Protection Area
- Figure 9: Local Depth to Water

- Appendix A: Landowner Approval
- Appendix B: Plat Map



FIGURES



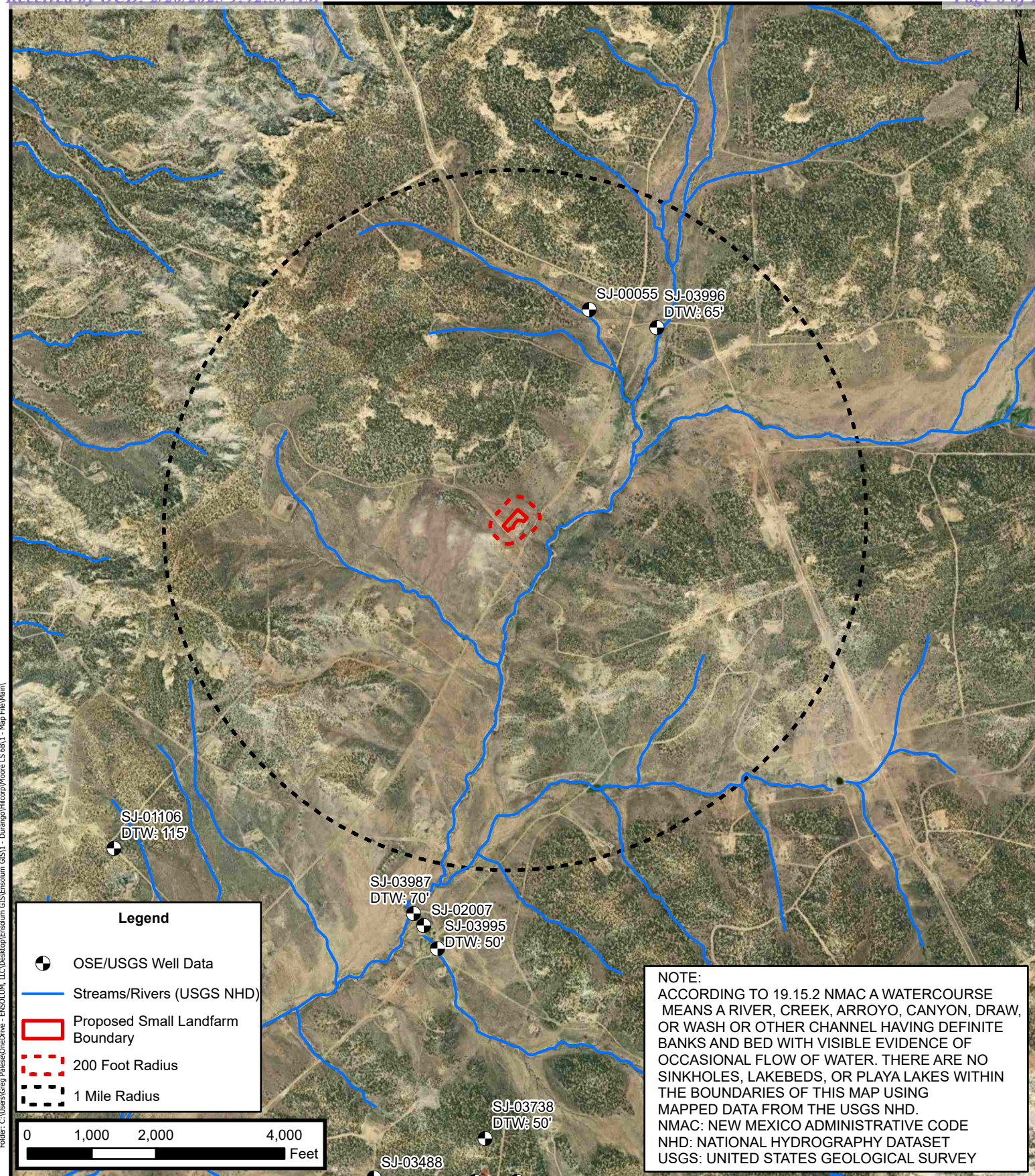
Site Map

Hilcorp Energy Company
Moore LS 6B

Unit O, Sec 25, T32N, R12W
San Juan County, New Mexico

FIGURE

1



Proximity to Watercourse, Lakebed, Sinkhole, or Playa Lake

Hilcorp Energy Company
Moore LS 6B

Unit O, Sec 25, T32N, R12W
San Juan County, New Mexico

FIGURE
2



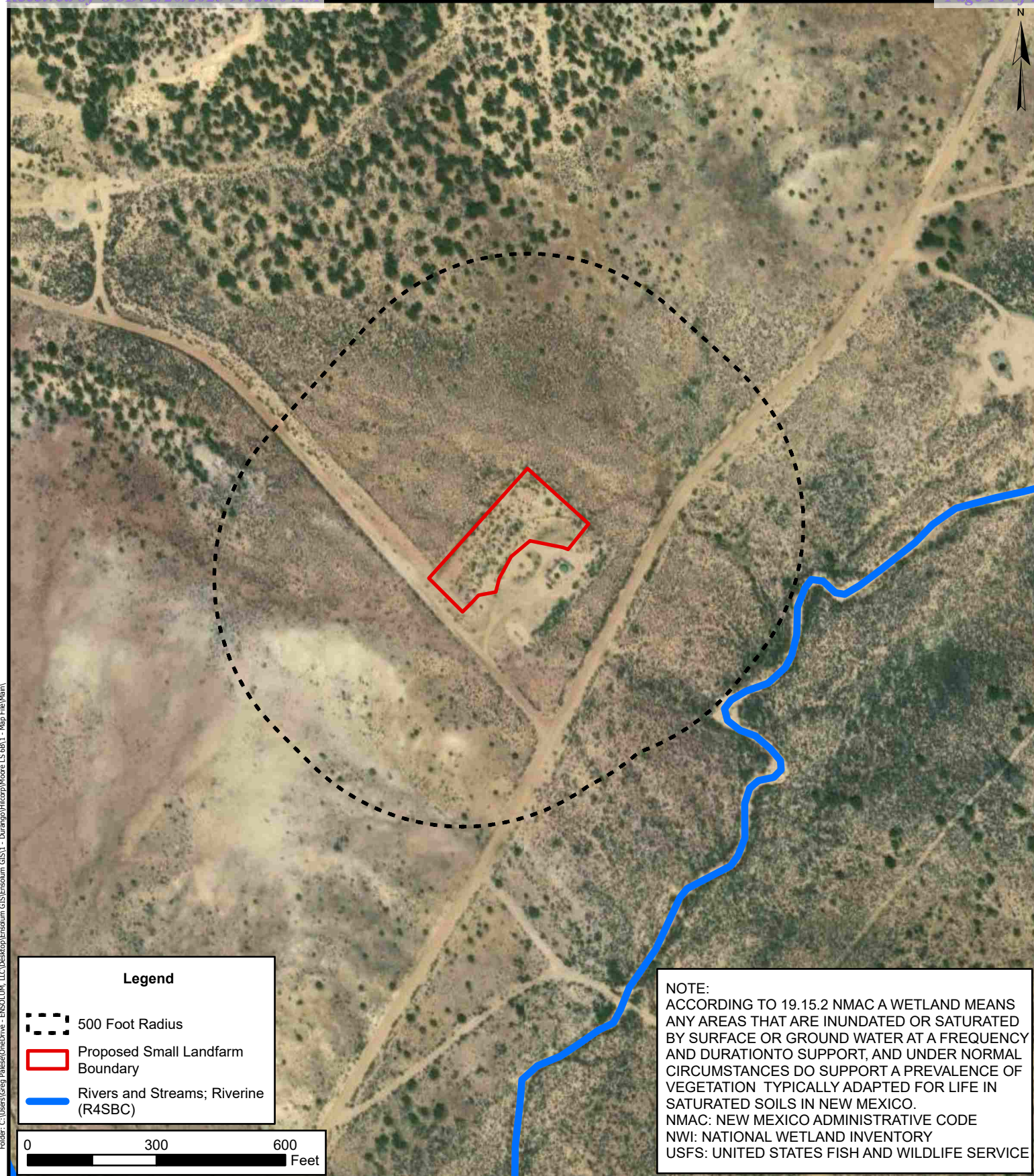
Proximity to 100-Year Floodplain

Hilcorp Energy Company
Moore LS 6B

Unit O, Sec 25, T32N, R12W
San Juan County, New Mexico

FIGURE

3



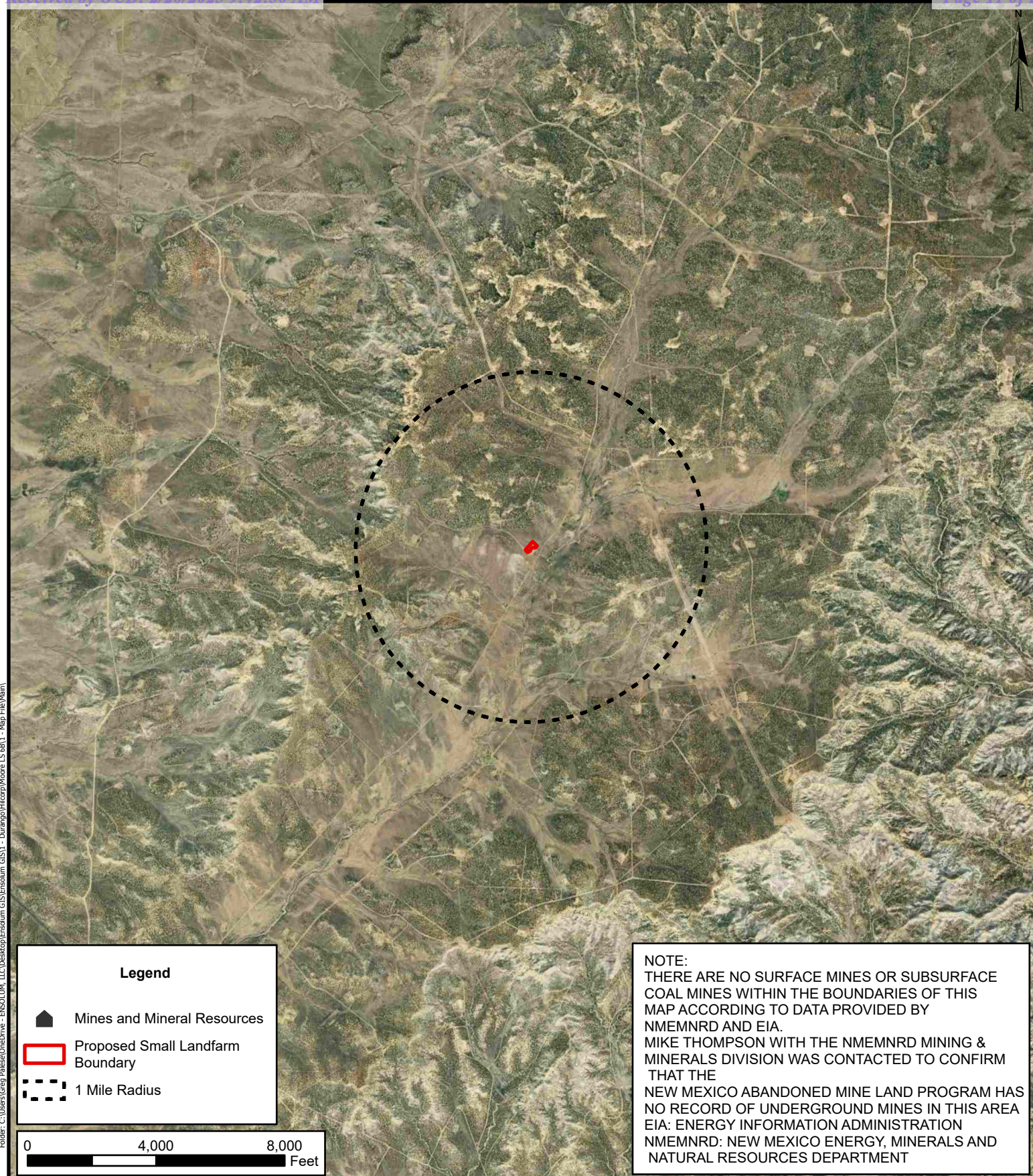
Proximity to Wetlands

Hilcorp Energy Company
 Moore LS 6B

Unit O, Sec 25, T32N, R12W
 San Juan County, New Mexico

FIGURE

4



Proximity to Subsurface Mine

Hilcorp Energy Company
Moore LS 6B

Unit O, Sec 25, T32N, R12W
San Juan County, New Mexico

FIGURE
5

From: [Tompson, Mike, EMNRD](#)
To: [Stuart Hyde](#)
Cc: [Wes Weichert](#)
Subject: RE: Abandoned Mine Question for Small Landfarm Permit
Date: Monday, May 6, 2024 1:19:21 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

[**EXTERNAL EMAIL**]

Hi Stuart,

The New Mexico Abandoned Mine Land Program does not know of any abandoned mines at those two locations.

Please let me know if you have any follow up questions.

Mike Tompson

Manager - New Mexico Abandoned Mine Land Program
Energy, Minerals and Natural Resources Department
Mining and Minerals Division
1220 South St. Francis Drive, Santa Fe, NM 87505
Cell: (505) 690-8063
Mike.Tompson@emnrd.nm.gov

From: Stuart Hyde <shyde@ensolum.com>
Sent: Monday, May 6, 2024 1:07 PM
To: Tompson, Mike, EMNRD <Mike.Tompson@emnrd.nm.gov>
Cc: Wes Weichert <wweichert@ensolum.com>
Subject: [EXTERNAL] Abandoned Mine Question for Small Landfarm Permit

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Mike,

I am currently working on siting criteria for two proposed small landfarm facilities for a client and we need to confirm that there are no abandoned mines at the proposed locations. One location is the Grenier 001B gas well pad located at coordinates 36.929933, -108.023772. The other is the Moore LS 6B well pad located at coordinates 36.951031, -108.045980.

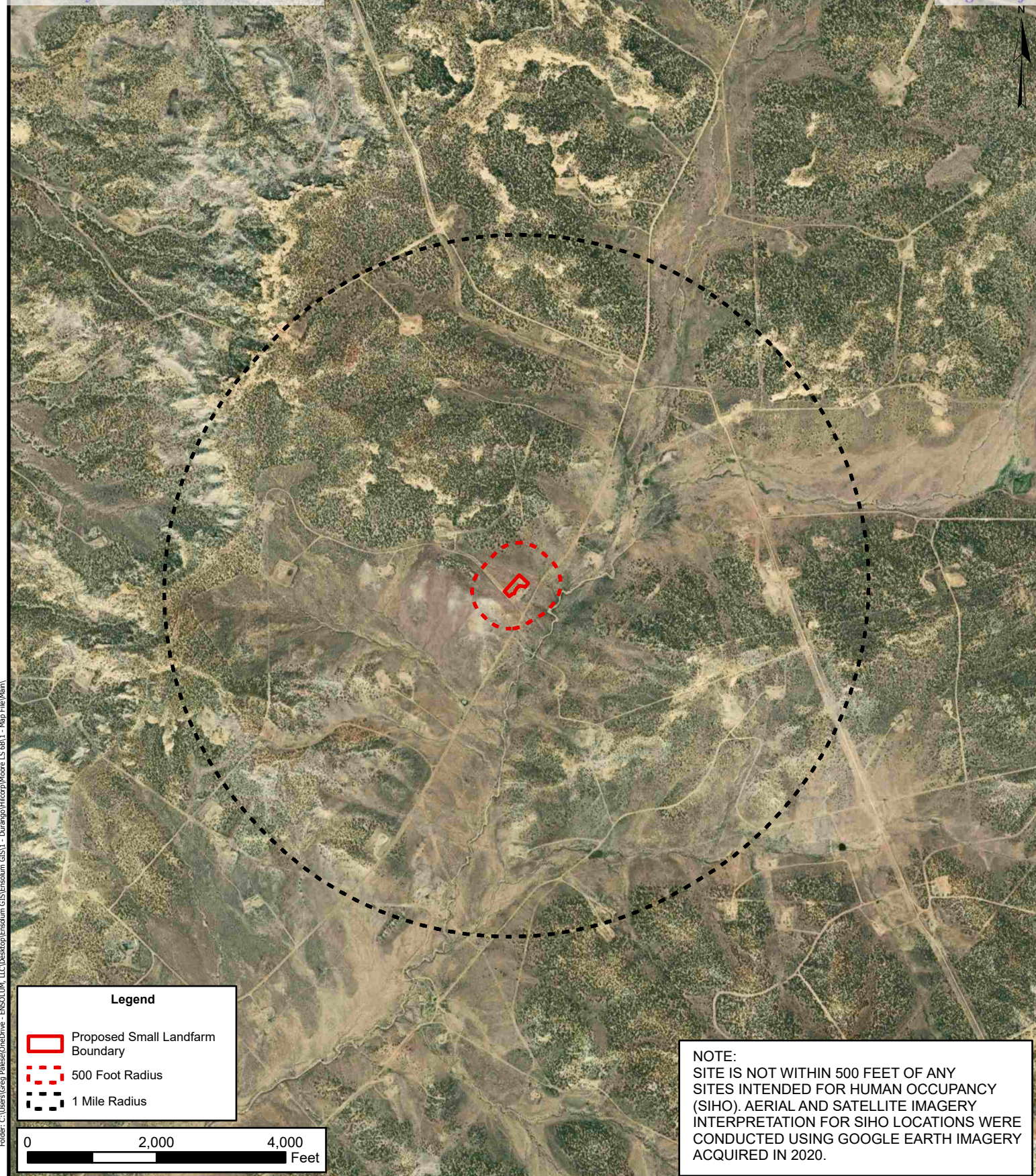
Can you please respond and confirm that there are no abandoned mines at these locations? Thank you, your help is much appreciated.

| **Stuart Hyde, PG**



(Licensed in WA/TX)
Senior Managing Geologist
970-903-1607
[Ensolum, LLC](#)
in f X

"If you want to go fast, go alone. If you want to go far, go together." – African Proverb

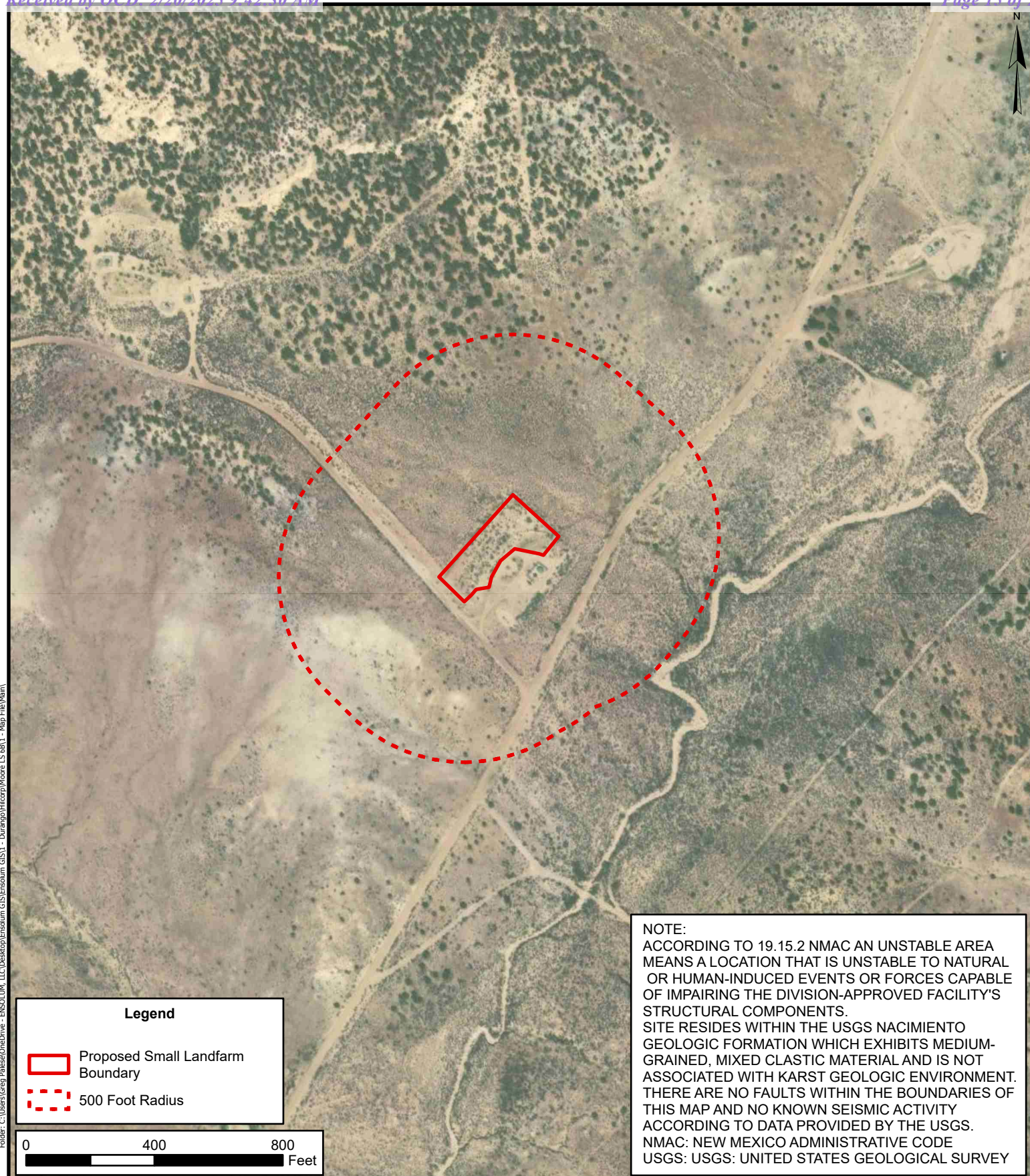


Proximity to Permanent Residence, School, Hospital, Institution or Church

Hilcorp Energy Company
Moore LS 6B

Unit O, Sec 25, T32N, R12W
San Juan County, New Mexico

FIGURE
6



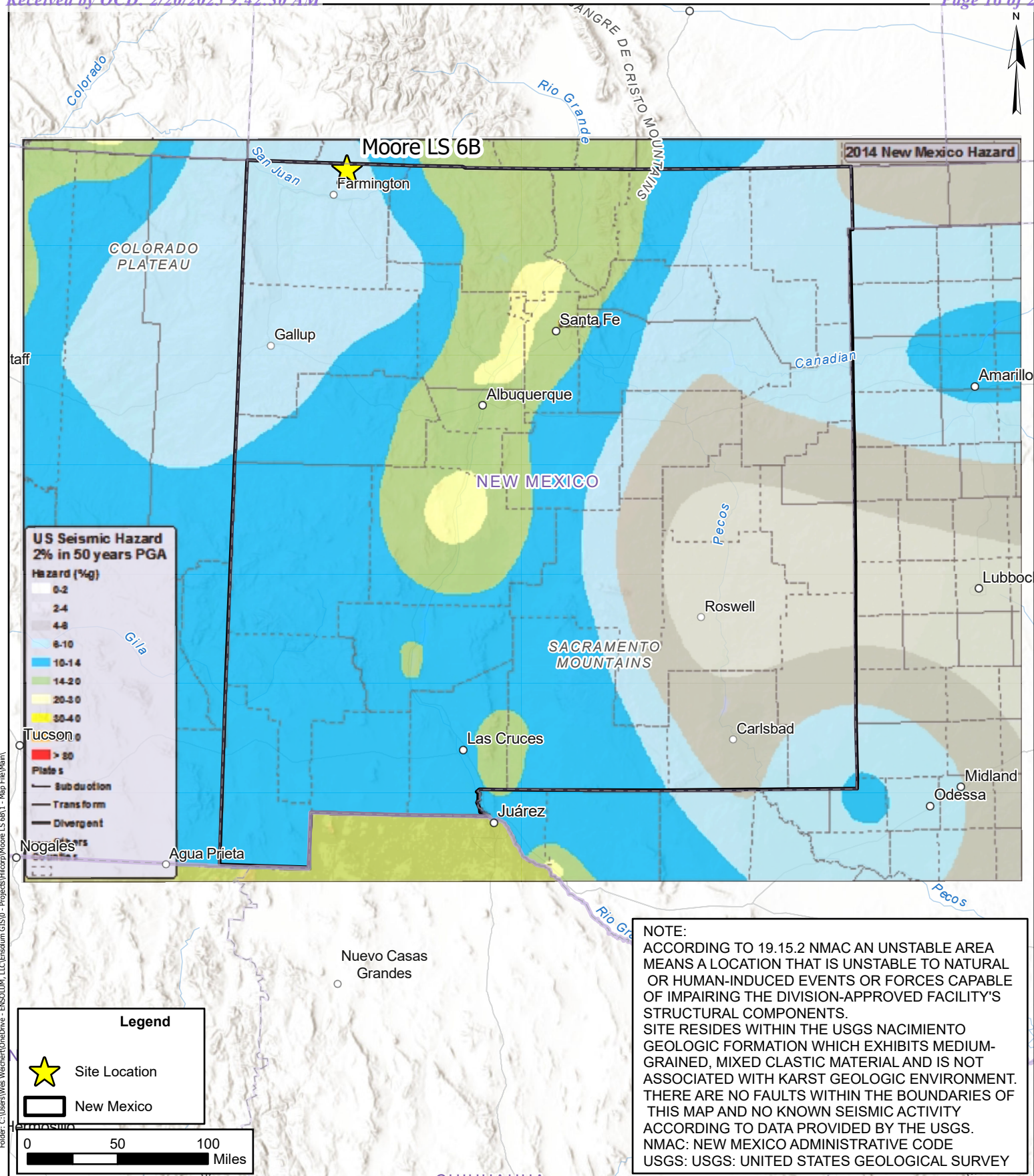
Proximity to Unstable Area

Hilcorp Energy Company
 Moore LS 6B

Unit O, Sec 25, T32N, R12W
 San Juan County, New Mexico

FIGURE

7



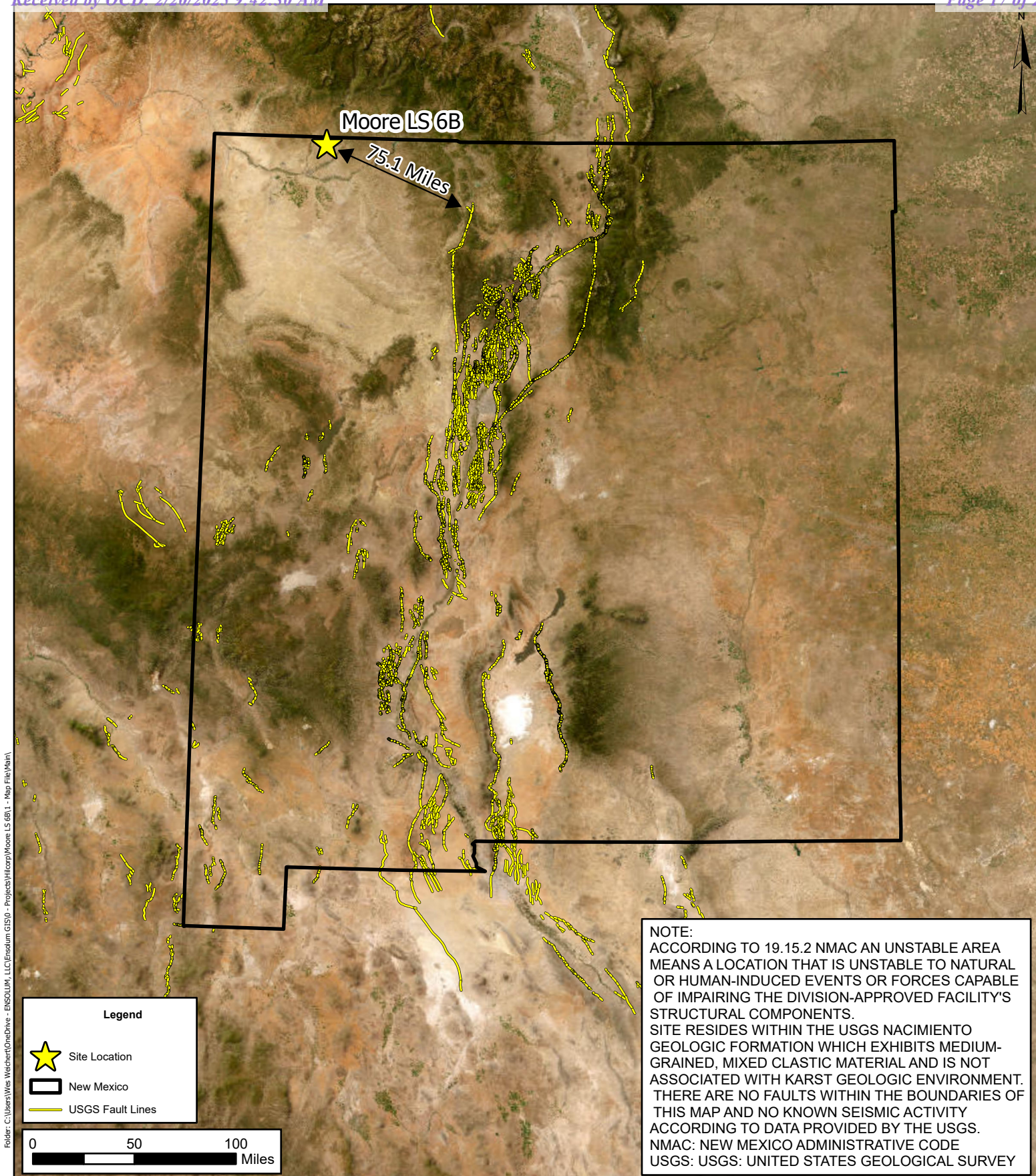
Proximity to Unstable Area - Seismic

Hilcorp Energy Company
Moore LS 6B

Unit O, Sec 25, T32N, R12W
San Juan County, New Mexico

FIGURE
7A



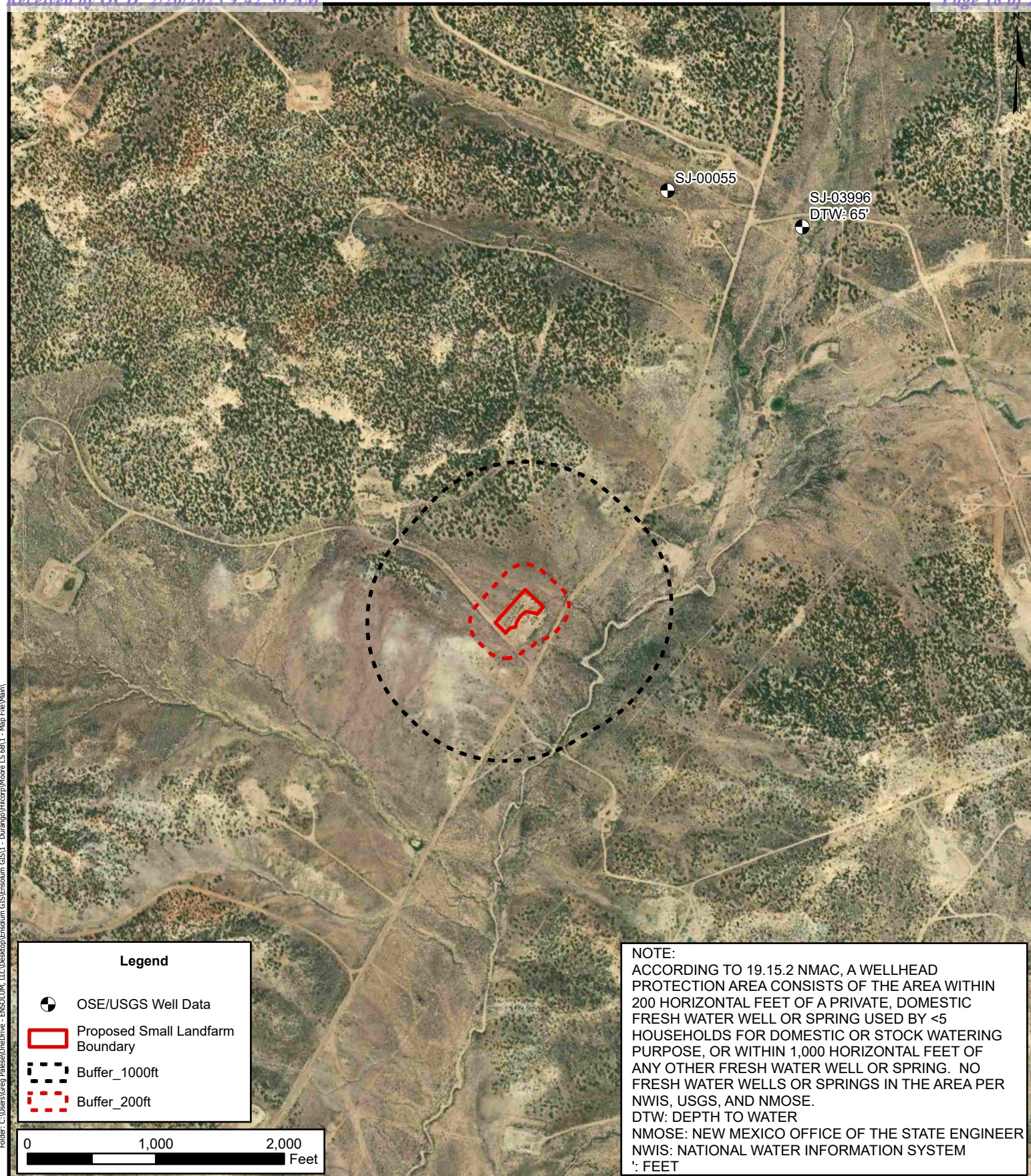


Proximity to Unstable Area - Faults

Hilcorp Energy Company
 Moore LS 6B

Unit O, Sec 25, T32N, R12W
 San Juan County, New Mexico

**FIGURE
 7B**



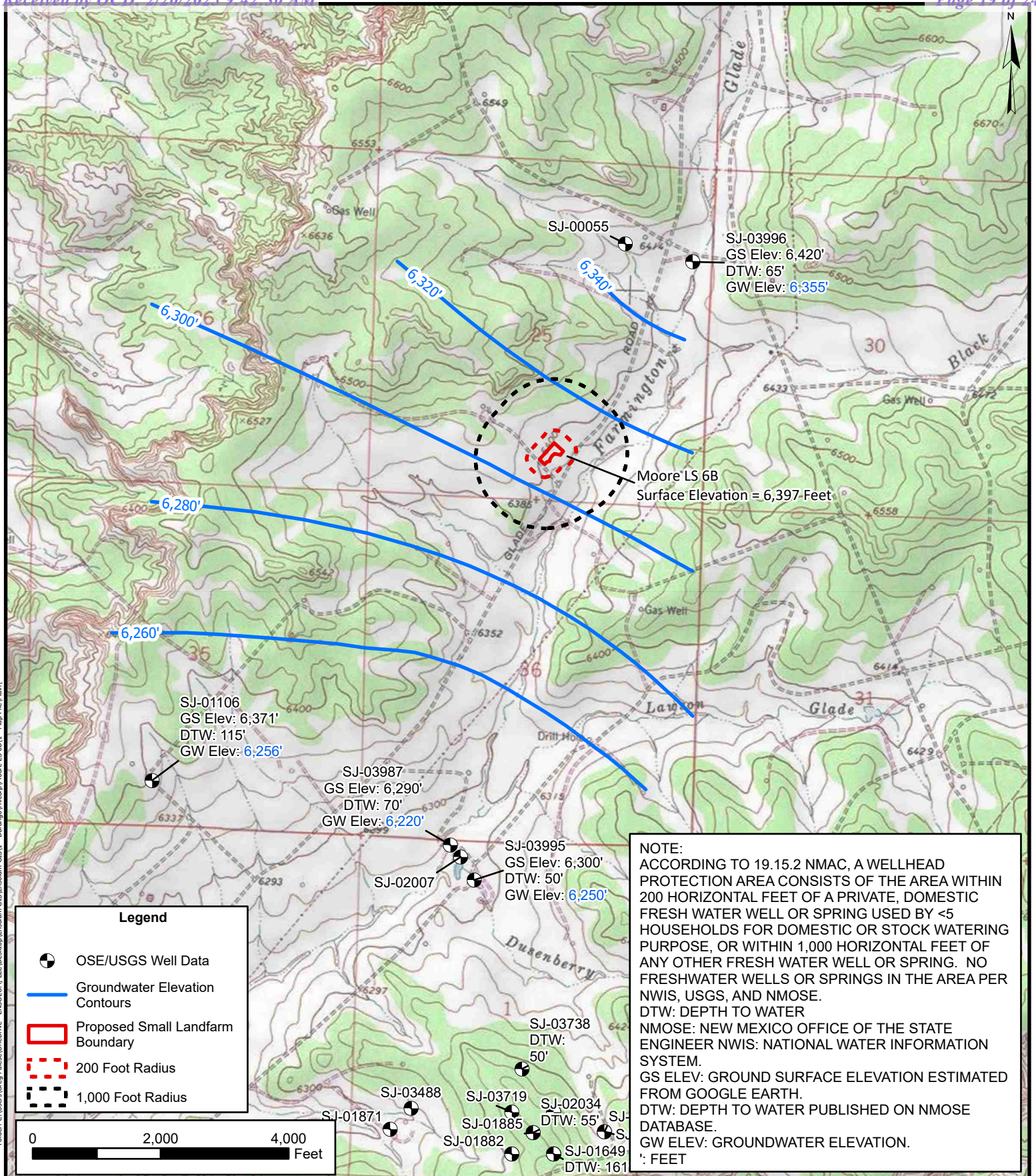
Proximity to Wellhead Protection Area

Hilcorp Energy Company
 Moore LS 6B

Unit O, Sec 25, T32N, R12W
 San Juan County, New Mexico

FIGURE

8





APPENDIX A

Landowner Approval



November 4, 2024

Certified Mail: 7022-2410-0003-1570-5896

Donna R. Marcotte Trust
2024 S. Melrose St.
Casper, Wyoming 82601

Subject: Small Landfarm Work Plan
Moore LS 6B
San Juan County, New Mexico

Donna R. Marcotte Trust:

Hilcorp Energy Company (Hilcorp) has experienced a 42-barrel condensate release on the Moore LS #6B due to vandalism. Bullet holes were found in the condensate tank that were the source of the spill.

Hilcorp has determined that the best way to remediate the contaminated soil is through a small land farm located on the existing Moore LS #6B well pad. Hilcorp proposed plan is to dig the contaminated soil (approximately 500 cubic yards) and utilize two (2) acres of the existing well pad for the land farm. Hilcorp will then on a monthly basis disc the soil to incorporate soil amendments and allow for aeration. I have enclosed the Small Land Farm Work plan for your review.

In order for the New Mexico Oil Conservation Division to approve the Land Farm we are required to get the surface owner approval. If Hilcorp has your approval, please sign below and return in the provided postage paid envelope.

For all general questions, please feel free to contact me. For technical questions please contact Mitch Killough (Sr. Environmental Specialist) at 713-757-5247.

The Donna R. Marcotte Trust hereby grants Hilcorp approval to conduct the above-described Land Farm on the Moore LS #6B well pad.

A handwritten signature in cursive script that reads 'Donna R. Marcotte Trust'.

Donna R. Marcotte Trust

Dated: 11/8/24

Best Regards,

A handwritten signature in cursive script that reads 'Ramon Hancock'.

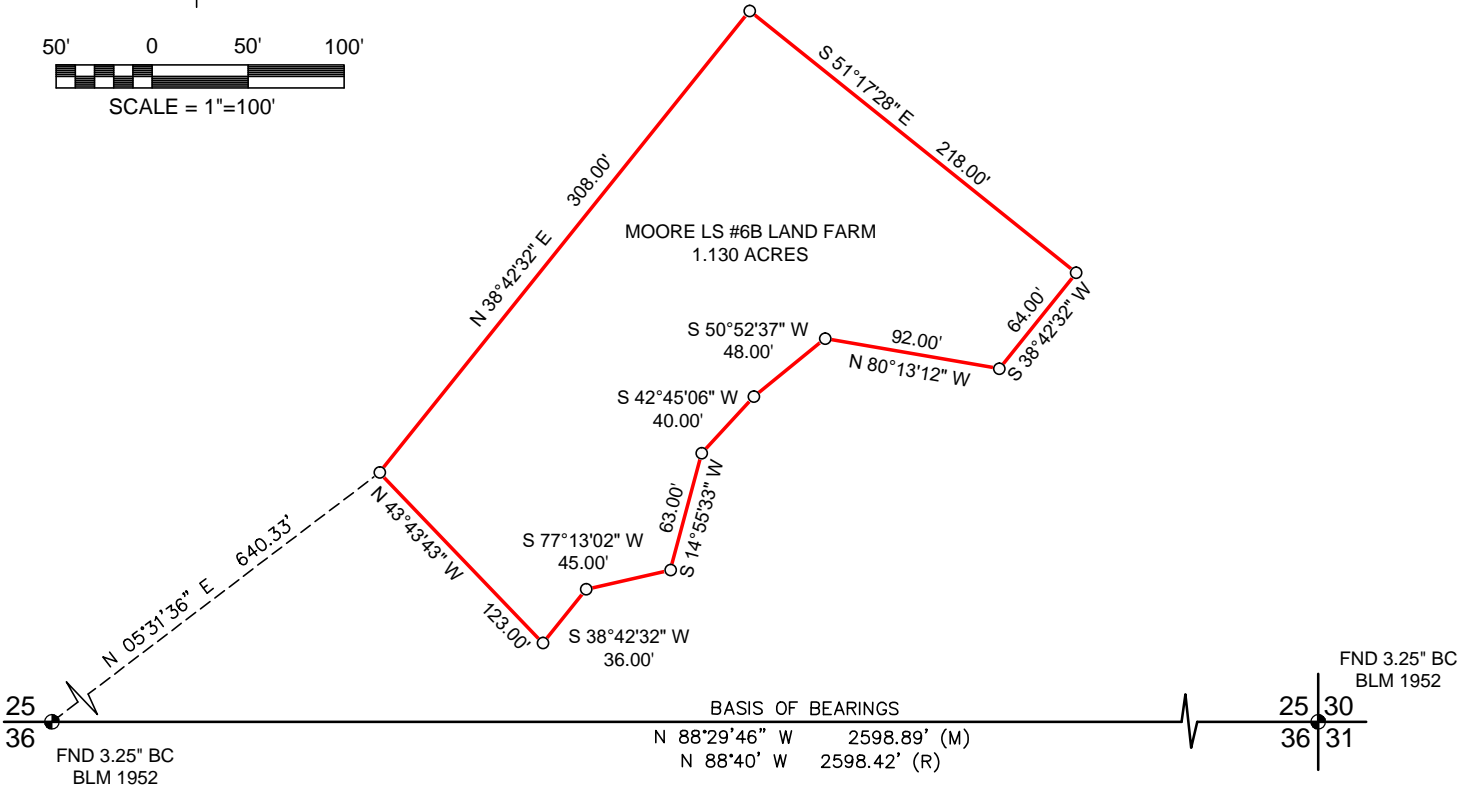
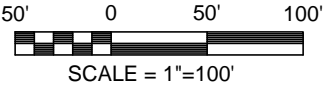
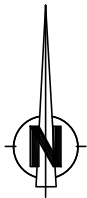
Ramon Hancock
Sr. Landman – San Juan North
Hilcorp San Juan, L.P.
505-324-5140



APPENDIX B

Small Landfarm Plat Map

PROPOSED BOUNDARY FOR
HILCORP ENERGY COMPANY
MOORE LS #6B LAND FARM
LOCATED IN THE SW/SE OF SECTION 25,
T32N, R12W, N.M.P.M.,
SAN JUAN COUNTY, NEW MEXICO
LANDS OF DONNA R. MARCOTTE TRUST



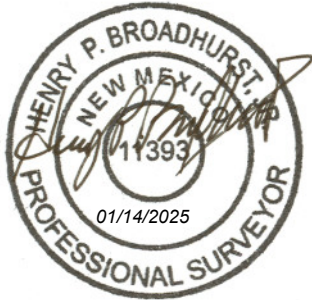
LEGAL DESCRIPTION:

A Parcel of Land within Lands owned by Donna R Marcotte Trust, and within the Southwest Quarter of the Southeast Quarter (SW/SE) of Section Twenty-Five (25), Township Thirty-Two (32) North, Range Twelve (12) West, of the New Mexico Principal Meridian, San Juan County, New Mexico, and said Parcel of Land being more particularly described by Metes and Bounds as follows:

COMMENCING at the Southeast Corner of said Section 25; THENCE, North 88°29'46" West for 2598.89 feet to the South Quarter Corner of said Section 25; THENCE, North 05°31'36" East for 640.33 feet to the Point of Beginning for the herein described Parcel of Land;

THENCE, North 38°42'32" East for 308.00 feet;
THENCE, South 51°17'28" East for 218.00 feet;
THENCE, South 38°42'32" West for 64.00 feet;
THENCE, North 80°13'12" West for 92.00 feet;
THENCE, South 50°52'37" West for 48.00 feet;
THENCE, South 42°45'06" West for 40.00 feet;
THENCE, South 14°55'33" West for 63.00 feet;
THENCE, South 77°13'02" West for 45.00 feet;
THENCE, South 38°42'32" West for 36.00 feet;
THENCE, North 43°43'43" West for 123.00 feet to the Point of Beginning.

The above described Parcel of Land contains 1.130 Acres, more or less.



NOTES

- 1) BASIS OF BEARINGS FOR THIS SURVEY ARE BETWEEN FOUND MONUMENTS AT THE SOUTHEAST CORNER AND THE SOUTH QUARTER CORNER OF SECTION 25, TOWNSHIP 32 NORTH, RANGE 12 WEST, N.M.P.M., SAN JUAN COUNTY, NEW MEXICO
LINE BEARS: N 88°29'46" W 2598.89'
- 2) DATE OF FIELD SURVEY: DECEMBER, 2024.
- 3) THIS EXHIBIT IS NOT A BOUNDARY SURVEY AND SHOULD NOT BE USED AS SUCH.
- 4) THIS EXHIBIT MAY NOT SHOW ALL EXISTING EASEMENTS AND UTILITIES.
- 5) CALL THE NEW MEXICO 811 SYSTEM FOR UTILITY LOCATIONS BEFORE EXCAVATING OR DIGGING.

PREPARED BY:

CCI
CHENAULT CONSULTING INC.

4800 COLLEGE BLVD #105
FARMINGTON, NM 87402

I, HENRY P. BROADHURST, JR., A NEW MEXICO REGISTERED PROFESSIONAL SURVEYOR CERTIFY THAT I CONDUCTED AND AM RESPONSIBLE FOR THIS SURVEY, THAT THIS SURVEY IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT THIS SURVEY AND PLAT MEET THE MINIMUM STANDARDS FOR SURVEYING IN NEW MEXICO.

~ SURFACE OWNERSHIP ~	
DONNA R. MARCOTTE TRUST	
1.130 ACRES	
DATE OF SURVEY	12/20/24 JC

DRAWING: MOORE LAND FARM	
SCALE: 1" = 100'	REV. 0 12/24/2024
DRAFTED BY: GRR	
SHEET: 1 of 1	

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

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

CONDITIONS

Action 433832

CONDITIONS

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 433832
	Action Type: [C-137] Small Landfarm (C-137EZA)

CONDITIONS

Created By	Condition	Condition Date
lbarr	Hilcorp must meet the requirements of Subsections A and B of 19.15.36.13 NMAC and 19.15.36.16 NMAC and the commitments/demonstrations included in the application. Registration expires on 2/27/2028.	2/27/2025