

**APPROVED**

September 25, 2024

Mr. Gerry Razaros, Director (Acting)  
Oil Conservation Division  
New Mexico Energy, Minerals and Natural Resources Department  
1220 S. Saint Francis Drive  
Santa Fe, New Mexico 87505

**Re: Request for Extension to Implementation of the Stage 2 Abatement Plan for the Reverse Osmosis (RO) Reject Discharge Fields, HF Sinclair Navajo Refining Incident #nRM2022559242, GW-028**

Review of the Request for Extension is approved and Mike Holder has been notified via email. In the interest of safety and well being of staff, HF Sinclair may postpone its seeding plan until the growing season of 2025. Please upload the permit(s) from the OSE for use of the water supply well.

Dear Mr. Razaros:

HF Sinclair Navajo Refining LLC (HFSNR) is submitting this request for an extension to implement the phytoremediation phase of the Stage 2 Abatement Plan (AP) for the Former Reverse Osmosis (RO) Reject Discharge Fields (RO Fields) at the HF Sinclair Navajo Refining LLC (HFSNR) Refinery located in Artesia, New Mexico. The Oil Conservation Division (OCD) approved the Stage 2 AP in July 2024.

The first phase of the Stage 2 AP was to install additional monitoring wells and moisture probes, and to collect soil samples for agronomic characterization. In addition, samples were collected from the water supply well that is expected to be used for irrigation purposes. HFSNR has completed this phase and will provide maps depicting the locations along with a summary of the soil and water supply well data in the first Quarterly Status Report to be submitted no later than October 30, 2024.

The next phase of the Stage 2 AP would be to prepare the fields and plant the proposed grasses for the phytoremediation pilot study. Prior to preparing the fields, HFSNR began subsurface utility clearance. **Figure 1** shows the locations of the subsurface pipelines identified during this process. As seen, there are two subsurface natural gas pipelines owned by the New Mexico Gas Company (NMGC) located in the North RO field and at least five subsurface liquid petroleum products pipelines owned by HFS Midstream in the South RO field. Both NMGC and HFS Midstream have requested that HFSNR excavate (or "pothole") to confirm the actual locations, depths, and diameters of the pipelines. This work is expected to begin by the end of September. In addition, the City of Artesia's sanitary sewer line bisects the North RO field, as does the Refinery's sanitary sewer tie in. The City of Artesia confirmed that the primary line is believed to be at least 20 feet below ground, but the depth of the Refinery tie-in needs to be confirmed, or at least confirmed to be deeper than the natural gas line.

The NMGC is also in the process of replacing one of the gas pipelines in its current easement and anticipates that the work will occur in the first quarter of 2025. As shown on the attached figure, a significant portion of the North RO field will be disturbed by the replacement. Any remediation work done in the area would likely need to be redone following construction activities. In addition, there are significant safety issues (i.e., the HFS Midstream lines and the NMGC lines) associated with performing the work. Seed bed preparation and seeding is expected to require approximately one month and rushing to complete it prior to the first anticipated freeze could result in safety issues due to incomplete

HF Sinclair Navajo Refining LLC  
501 East Main, Artesia, NM 88210  
575-748-3311 | HFSinclair.com



utility/line location. Based on these reasons, HFSNR believes it would be best to delay the field preparation and planting to the spring of 2025.

During this delay, HFSNR will proceed with evaluation of irrigation systems and with updating the water supply well permit with the New Mexico Office of the State Engineer (OSE) to allow use of that well for irrigation purposes. HFSNR will also continue with submittal of Quarterly Progress Reports and will notify the OCD when field preparation and planting is scheduled to occur.

If you have any questions, please feel free to contact Teresa Alba at 575-746-5391 or Mike Holder at 575-308-1115.

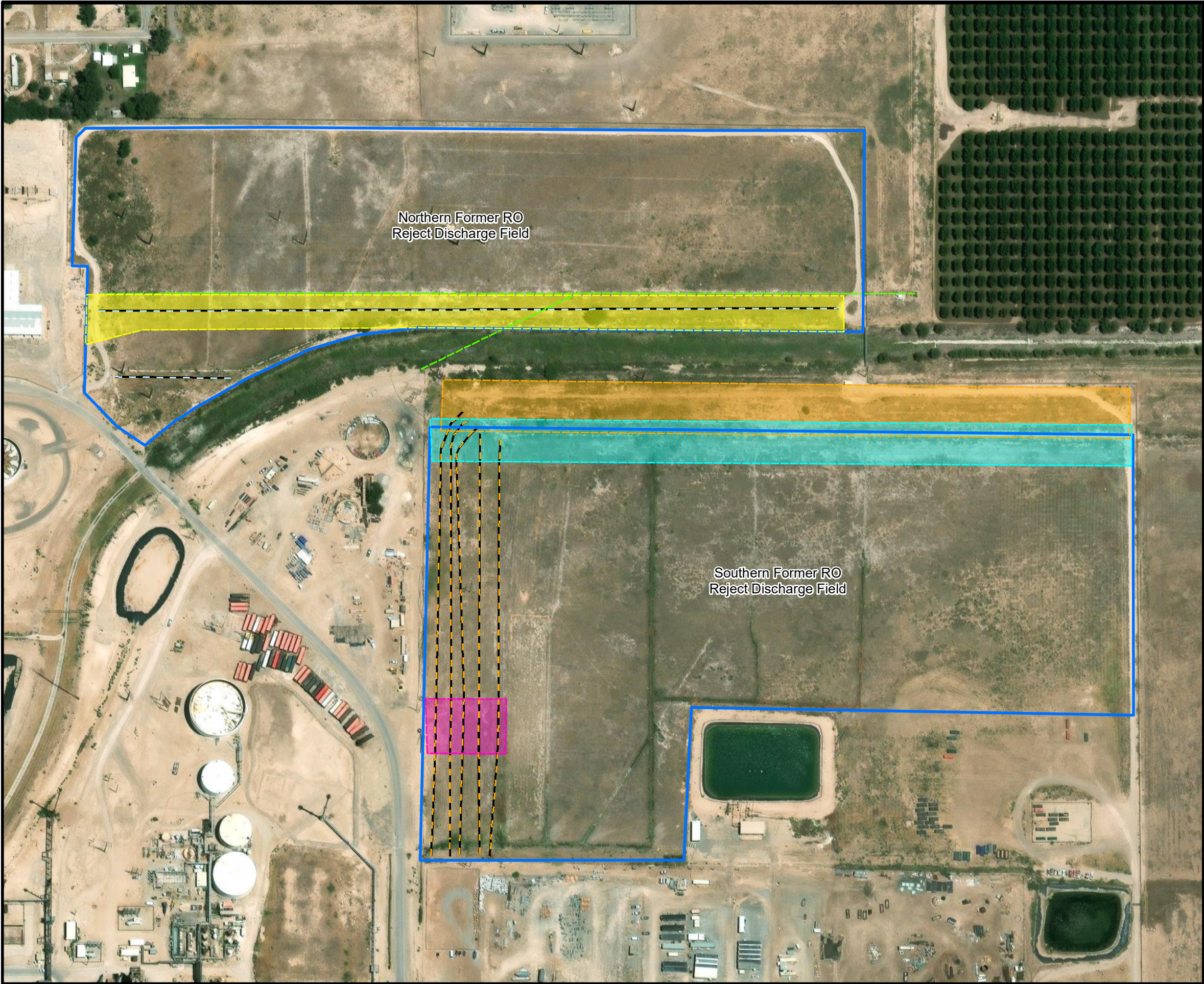
Sincerely,

A handwritten signature in blue ink, appearing to read 'Case Hinkins'. The signature is fluid and cursive.

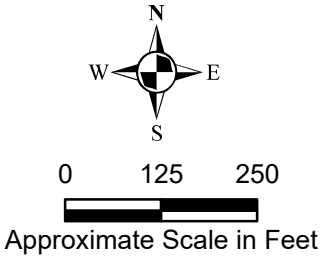
Case Hinkins  
Environmental Manager  
HF Sinclair Navajo Refining LLC

c:      OCD: M. Buchanan  
         NMED: L. Tsinnajinnie, N. Dhawan  
         HFSNR: M. Holder, T. Alba





- Legend**
- RO Fields Boundaries
  - Unidentified Pipeline Segment (To Be Confirmed)
  - Liquid Petroleum Pipelines Corridor (Pipeline Locations Not Confirmed)
  - Potential Fiberglass Pipelines (To Be Confirmed)
  - Planned Natural Gas Pipeline Replacement Work Zone
  - Subsurface Sanitary Sewer
  - Natural Gas Pipelines
  - Subsurface Liquid Petroleum Pipelines



LOCATION OF SUBSURFACE UTILITIES WITHIN  
FORMER RO REJECT DISCHARGE FIELDS  
HF SINCLAIR NAVAJO REFINING LLC  
ARTESIA REFINERY, EDDY COUNTY, NEW MEXICO



FIGURE  
1



**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  
**District IV**  
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 386762

**CONDITIONS**

Operator: HF Sinclair Navajo Refining LLC ATTN: GENERAL COUNSEL Dallas, TX 75201	OGRID:
	15694
	Action Number:
	386762
Action Type:	
[UF-GWA] Ground Water Abatement (GROUND WATER ABATEMENT)	

**CONDITIONS**

Created By	Condition	Condition Date
michael.buchanan	Review of the Request for Extension is approved with notification given to HF Sinclair via email on 10/02/2024. In the interest of safety and well being of staff, HF Sinclair may postpone its seeding plan for the ST2 AP at the RO discharge fields until the growing season of 2025. Please upload the permit(s) from the OSE for use of the water supply well.	10/16/2024