



April 30, 2025

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

**Re: Stage 2 Abatement Plan (AP) for the Former Reverse Osmosis (RO) Reject Discharge Fields at the HF Sinclair Navajo Refining LLC (HFNSR)  
Quarterly Status Report #3 – January to March 2025  
Incident #nRM2022559242, GW-028**

Dear Mr. Razatos:

HF Sinclair Navajo Refining LLC (HFSNR) is submitting this third quarterly status report for 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 (Refinery) located in Artesia, New Mexico (**Figure 1**). The Oil Conservation Division (OCD) approved the Stage 2 AP on July 11, 2024. The former RO Fields are located within the northern portion of the active Refinery (**Figure 2**).

This quarterly status covers the period of January through March 2025.

**Work Performed During January through March 2025**

**January 2025:**

- January 28: Stage 2 AP Quarterly Progress Report #2 was submitted to OCD.
- January 30: City of Artesia water reuse line was located. Communication with city personnel indicated the line is shown south of the North RO field; however, it would be best to confirm the location. The location was confirmed by city maintenance personnel to be south of the N RO field.
- Irrigation system options were reviewed throughout the month of January.
- No field work was performed due to winter weather conditions.

**February:**

- Irrigation system options were reviewed throughout February and cost estimates were obtained.
- No field work was performed due to winter weather conditions.

HF Sinclair Navajo Refining LLC  
501 East Main, Artesia, NM 88210  
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#### March 2025:

- Irrigation system option was selected in early March and cost estimate was finalized.
- March 17: Pre-field work planning meeting was conducted with contractors and field work start date was finalized.
- March 24: Kickoff meeting was conducted on-site with contractors, equipment was mobilized to the site, and field preparation began.
- March 25 to 31: Field preparation continued, including ripping the soil to a depth of 2 feet and removal of existing vegetation. **Attachment A** contains photographs of the field preparation activities.

#### Work Planned for April through June 2025

##### April 2025:

- Soil ripping will be completed.
- Irrigation piping and equipment installation will begin.
- The fields will be smoothed using a “floater” so that future harvesting equipment can be used without damage.

##### May 2025:

- Irrigation piping and equipment installation will be completed.
- Water meter will be installed on the discharge line from water well, before the distribution piping to RO fields. While this meter is not required for reporting water usage to the Office of the State Engineer (OSE), it will be used to record the volume of water applied to the RO fields.
- Both fields will be seeded using a disc seeder.
- Irrigation will be initiated.
- Monitoring of the vegetation will begin.

June 2025: Monitoring of vegetation growth will continue.

#### OCD Correspondence

HFSNR submitted a letter to OCD on September 25, 2024 requesting an extension to the Stage 2 AP implementation schedule, specifically to delay the field preparation and planting phase to begin in March 2025. The two primary reasons for the extension were the need to positively locate numerous subsurface pipelines within the fields and a planned installation of a new natural gas pipeline through the North RO field by the New Mexico Gas Company (NMGC). The positive location of subsurface utilities was completed as described in the second quarterly Stage 2 AP progress report submitted to OCD on January 28, 2025.

The new NMGC pipeline was initially planned to be installed during the first quarter of 2025. In November 2024, NMGC notified HFSNR that the pipeline project had been delayed, potentially to 2026. HFSNR notified OCD of this change in schedule via email on November 26, 2024. Mike Buchanan of OCD



replied to Mike Holder of HFSNR via email and requested that a copy of the email correspondence be included as part of the next report submission for record. That email was not included in the January 28, 2025 quarterly report but is included as **Attachment B** to this report. The email from HFSNR included a bullet list of tasks to be completed prior to the field preparation and seeding. The tasks listed and the current status of those tasks include:

- Coordinate with the City of Artesia on locating its water re-use line that may bisect the RO fields.
  - On January 30, 2025, as stated in this report, city personnel visited the refinery and confirmed the location of the city re-use line is south of the North RO field.
- Update the figures with “no plow” zones for NMGC and HEP Midstream. This is where we have multiple product/gas lines in place and they are asking we not perform subsurface disturbance work in these areas – this is something we’ll need to discuss with you. We are already asking if we can alter the plowing depth to a few inches as opposed to 2 feet and will keep you posted. We may have to broadcast seed w/out bed preparation but we’ll see.
  - An updated figure with “no plow” zones was provided in the second Stage 2 AP quarterly status report on January 28, 2025. **Figure 3** of this report also shows those zones.
  - NMGC and HEP Midstream have been contacted to confirm seeding methods that will be allowed within the “no plow” zones before seeding begins in April 2025.
- Get irrigation source water rights permitted by the OSE (modifying one of the Refinery’s water rights for this).
  - HFSNR applied for a temporary permit to use an existing artesian well RA-602 for industrial and irrigation purposes. The OSE granted that request on February 27, 2025, which allows the use of existing well RA-602 for irrigation of the RO fields.
  - The temporary permit is effective until November 1, 2029. During the period that the temporary permit is in effect, HFSNR will continue to work with OSE to ensure adequate water is available for irrigation of the RO fields for the duration of the phytoremediation project.
- Install water meters and distribution infrastructure.
  - Installation of irrigation distribution piping will begin in April 2025. The planned layout of the distribution piping is shown in **Figure 3** of this report. An updated figure will be provided in the quarterly status report following completion of installation.
  - As discussed in this report, a water meter will be installed on the discharge line from water well, before the distribution piping to RO fields to record the volume of water applied to the RO fields. This work is expected to be completed in May 2025.
- Determine potential irrigation systems (water trucks, mobile spray guns, more permanent system with either above or below grade piping) and select best approach.
  - A rolling irrigation system has been selected.
  - The South RO field will have two sections: one to cover the eastern portion of the field and one to cover the western portion of the field. Each of the two systems will be placed



so that they roll in a north-south direction and will obtain irrigation water from the north-south section of the distribution piping.

- The North RO field will have three sections: one to cover the eastern portion of the field and two to cover the western portion of the field. All of the systems will be placed so that they roll in a north-south direction and will obtain irrigation water from the north-south section of the distribution piping. The systems on the western portion of the field will travel from the north to the northern line of large overhead power poles (towers) and from the south to the southern line of large overhead power poles.

If you have any questions, please feel free to contact Jace Ragland at 802-557-8904 or Mike Holder at 575-308-1115.

Sincerely,

Case Hinkins  
Environmental Manager  
HF Sinclair Navajo Refining LLC

c:      OCD: M. Buchanan HFSNR: M. Holder, T. Alba, J. Ragland

**Figures**

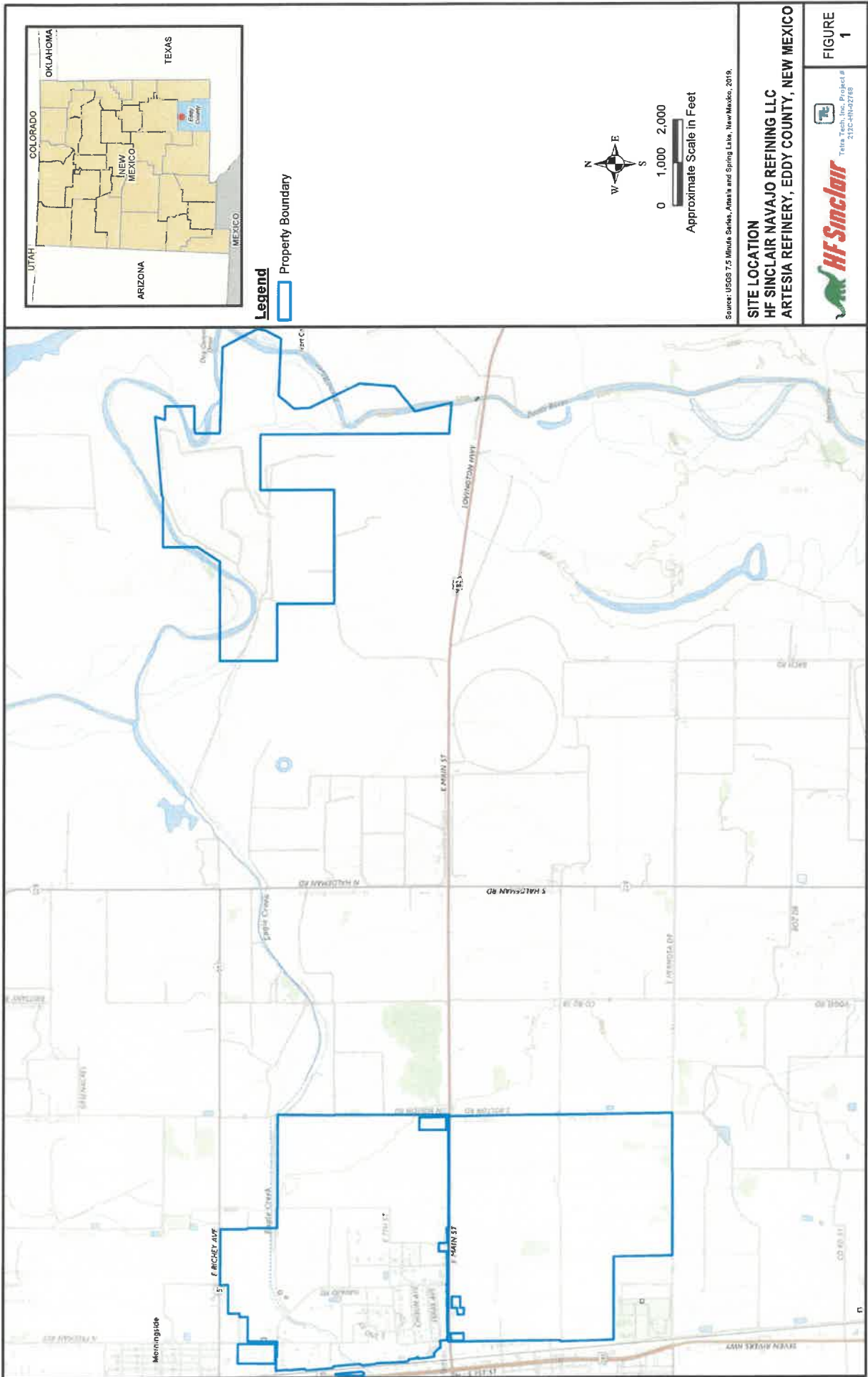
- 1 – Site Location
- 2 – Location of Former RO Reject Discharge Fields
- 3 – Irrigation System Layout

**Attachments:**

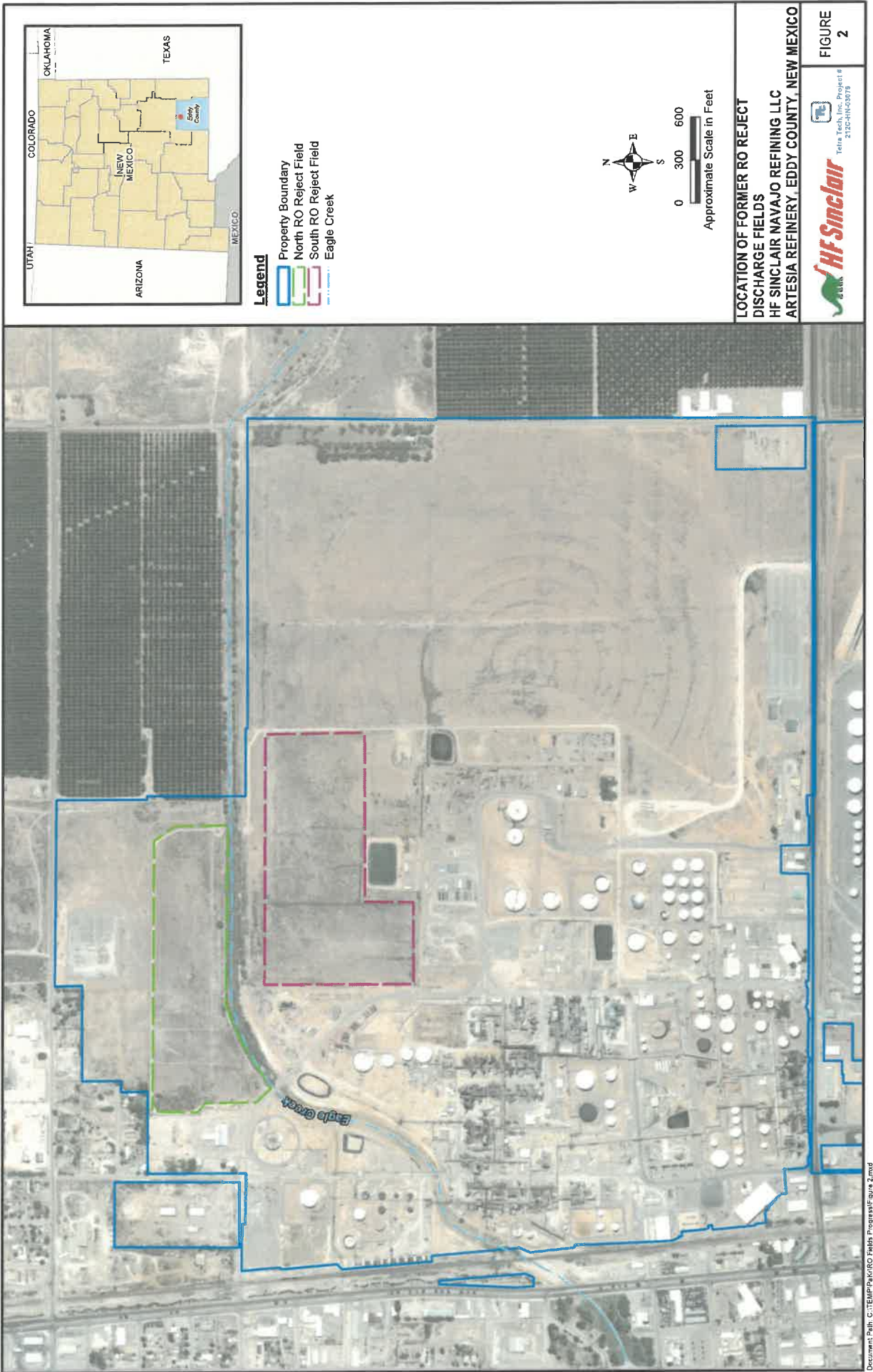
- A – Field Preparation Photologs
- B – November 26, 2024 email

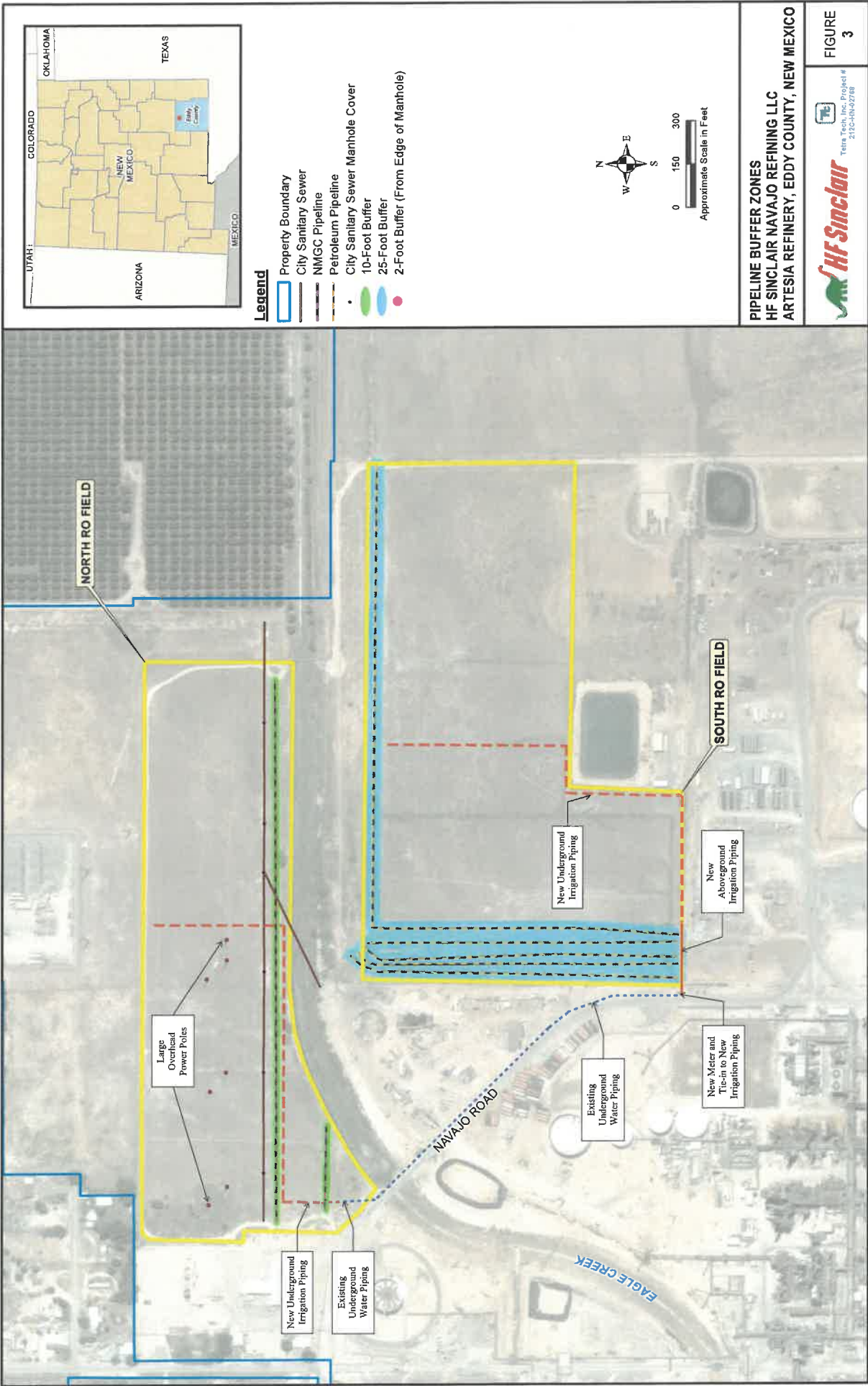


## FIGURES













## **ATTACHMENT A – FIELD PREPARATION PHOTOLOGS**

## Photographic Log

### HF Sinclair Navajo Refining LLC



Photo 1: Overview of soil ripping in S RO field, facing west.



Photo 2: View of dozer ripping soil in north-south direction in S RO field, facing north.



Photo 3: Closeup of dozer ripping soil to 2 feet below ground in S RO field.




Photo 4: View of tree growing in N RO field, to be removed.



Photo 5: View of dozer ripping soil between berm/road on north side of N RO field and line of security lights, facing west.



Photo 6: View of northern portion of N RO field, facing west.

Date Taken	Job No.	Photographs Taken By:	Page No.	Client:	Site Name:	 TETRA TECH
March 2025	212C-HN-03200	Jorge Fernandez Velo	1 of 1	HFSNR	RO Fields	



**ATTACHMENT B – NOVEMBER 26, 2024 EMAIL**

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**From:** Buchanan, Michael, EMNRD <Michael.Buchanan@emnrd.nm.gov>  
**Sent:** Tuesday, November 26, 2024 4:03 PM  
**To:** Holder, Mike <Michael.Holder@HFSinclair.com>  
**Cc:** Alba, Teresa <Teresa.Alba@HFSinclair.com>  
**Subject:** [EXTERNAL] NMGC Line Replacement - Change in Plans

**CAUTION:** This email originated from outside of the HF Sinclair organization. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon, Mike

Thank you for the update on the planned work and items below. Please keep a copy of this email correspondence as part of the next report submission for record. Also, please include a detailed narrative for each of the items below as they are planned and implemented in the reports, include an updated site map where work is to be completed or undisturbed due to infrastructure. Let me know when you would like to meet to discuss the rest of the details for the no disturbance zones. Happy Thanksgiving to you as well!

Thank you for the communication on the site and planned activities,

Mike

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**From:** Holder, Mike <Michael.Holder@HFSinclair.com>  
**Sent:** Tuesday, November 26, 2024 12:27 PM  
**To:** Buchanan, Michael, EMNRD <Michael.Buchanan@emnrd.nm.gov>  
**Cc:** Holder, Mike <Michael.Holder@HFSinclair.com>; Alba, Teresa <Teresa.Alba@HFSinclair.com>  
**Subject:** [EXTERNAL] NMGC Line Replacement - Change in Plans

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

Mike – we just got word that NMGC has postponed its gas line replacement until 2026. Given that whether they proceed in 2026 or delay again, I'm thinking that we go ahead and implement the phytoremediation project, as planned, in March 2025 (or earlier if we can get everything lined up). Tasks we still need to get done prior to plowing & seeding are:

- Coordinate with City of Artesia on locating its water re-use line that may bisect the RO fields
- Update the figures with "no plow" zones for NMGC and HEP Midstream. This is where we have multiple product/gas lines in place and they are asking we not perform subsurface disturbance work in these areas – this is something we'll need to discuss with you. We are already asking if we can alter the plowing depth

to a few inches as opposed to 2 feet and will keep you posted. We may have to broadcast seed w/out bed preparation but we'll see.

- Get irrigation source water rights permitted by the OSE (modifying one of the Refinery's water rights for this)
- Install water meters and distribution infrastructure
- Determine potential irrigation systems (water trucks, mobile spray guns, more permanent system with either above or below grade piping) and select best approach. I know the OSE will mandate that we use the most effective method but at the same time, we need a method that will not be disturbed by maintenance and harvesting techniques.

Thanks for your patience and sorry for the hassle. Let me know if you have any questions and we'll keep you posted on progress. Have a very Happy Thanksgiving!

Mike

**Mike Holder**

Environmental Specialist | Corporate Environmental

M 575-308-1115

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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 457224

CONDITIONS

Operator: HF Sinclair Navajo Refining LLC ATTN: GENERAL COUNSEL Dallas, TX 75201	OGRID: 15694
	Action Number: 457224
	Action Type: [UF-GWA] Ground Water Abatement (GROUND WATER ABATEMENT)

CONDITIONS

Created By	Condition	Condition Date
jburdine	Review of the 3rd Quarterly Status Report for the ST2 AP at the Former RO Discharge Fields at the HF Sinclair Navajo Refining LLC, January to March 2025.: content satisfactory 1. Proceed with plans to conduct semi-annual groundwater monitoring, facility-wide 2. Continue irrigation set up and monitoring 3. Continue preparation of RO fields for vegetation and monitoring of vegetation growth. 4. Submit the next quarterly update as scheduled in July 2025.	6/12/2025