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

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.

								_
			Below-G					
BGT 2	Proposed Alternative Method Permit or Closure Plan Application							
		Below grade tank r						
		Permit of a pit or pr Closure of a pit, be				ernative method		
	ļ	Modification to an				ciliative illetilou		
	ĺ	Closure plan only s				ted or non-permit	ted pit, below-grade tank,	
	or proposed alterna	ative method						
		submit one application		_	-	-	<u>-</u>	
							surface water, ground water or the athority's rules, regulations or ordinances	3.
1. Operator:	Hilcorp Energy Co	mpany		(OGRID) #:	372171	
-								
		AN 28-6 UNIT NP 457 –					_	
							RIO ARRIBA	
		36.651696°N						
•	_	Private Tribal Trust				10,1100120 11	1.1200	
								_
2. Pit. Subsecti	ion F, G or J of 19.1:	5 17 11 NMAC						
	rilling Workover							
	_		ti Wall Eluid M	Ionocomont		Law Chlarida I	Orilling Fluid ☐ yes ☐ no	
				-			*	
		nicknessmii] нрье 🗀	PVC			
String-Reinfor				*** 1		111 5'		
Liner Seams:	Welded Factory	Uther		Volume:		bbl Dimensions	s: L x W x D	
3.								_
Below-grade t	tank: Subsection I	of 19.15.17.11 NMAC						
Volume:	<u>40</u> bbl	Type of fluid:	Produced Wat	ter		 		
Tank Construction	n material:	<u>Fiberglass</u>						
☐ Secondary con	ntainment with leak of	letection Visible sid	lewalls, liner, 6-	inch lift and	automa	atic overflow shut-o	off	
☐ Visible sidew	alls and liner 🛛 Vi	sible sidewalls only	Other					
		mil						
71				_	•			
4. Alternative M	lethod:							
		uired. Exceptions must	t be submitted to	o the Santa F	e Envir	ronmental Bureau o	ffice for consideration of approval.	
Successful of the Ca	ecoption request is rec	panea. Exceptions mast	. oe suomitteu t		C EHVH	- Dareau C	moe for constactation of approvan	
5. Fencing: Subsect	tion D of 19 15 17 11	NMAC (Applies to perm	nanent nits tem	norary nits	and hel	low-grade tanks)		
			•			,	nt residence, school, hospital,	
institution or chur	-	rands of barbed wife at t	ор (печиней ў	iocuica willi	<i>iii</i> 1000	r jeer of a permaner	и гезменсе, зеноон, ногрнин,	
☐ Four foot heigh	ht, four strands of bar	bed wire evenly spaced l	between one an	d four feet				
Alternate. Plea	ase 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	
8. <u>Variances and Exceptions:</u> 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.	
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.	☐ Yes ☐ No
- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	⊠ NA
Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.	☐ Yes ☐ No
NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	⊠ NA
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	☐ Yes ☐ No
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	
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)	☐ Yes ☐ No
 Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map 	
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;.	☐ Yes ⊠ No
- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	
Temporary Pit using Low Chloride Drilling Fluid (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,	☐ Yes ☐ No
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	
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	
within 200 norizontal feet of a spring or a private, domestic fresh water well used by less than five nouseholds 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 Naturations: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the do 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 19.15.17.9 Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.12 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 Number:	O NMAC 15.17.9 NMAC
II.	
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 do attached. 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 19 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	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 Wester Street Characterization	
☐ 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 F Alternative Proposed Closure Method: Waste Excavation and Removal	luid Management Pit
Waste Removal (Closed-loop systems only) On-site Closure Method (Only for temporary pits and closed-loop systems) In-place Burial On-site Trench Burial Alternative Closure Method	
14.	
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be closure plan. Please indicate, by a check mark in the box, that the documents are attached. □ 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 sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. F 19.15.17.10 NMAC for guidance.	
Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, 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 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
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; W	Vritten approval obtained from t	he municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine Written confirmation or verification or map from the NM EM	INRD-Mining and Mineral Div	ision	☐ Yes ☐ No
Within an unstable area. - Engineering measures incorporated into the design; NM Bure Society; Topographic map	eau of Geology & Mineral Reso	urces; USGS; NM Geological	
Within a 100-year floodplain.			Yes No
- FEMA map			☐ Yes ☐ No
16. 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 re □ Construction/Design Plan of Burial Trench (if applicable) bass □ Construction/Design Plan of Temporary Pit (for in-place burial □ Protocols and Procedures - based upon the appropriate requirer □ Confirmation Sampling Plan (if applicable) - based upon the appropriate rec □ Disposal Facility Name and Permit Number (for liquids, drillir □ Soil Cover Design - based upon the appropriate requirements of □ Re-vegetation Plan - based upon the appropriate requirements of □ Site Reclamation Plan - based upon the appropriate requirements of	ppropriate requirements of 19.1 equirements of Subsection E of ed upon the appropriate required of a drying pad) - based upon ments of 19.15.17.13 NMAC ppropriate requirements of 19.15.17.13 NMAC purisements of 19.15.17.13 NMAC ppropriate requirements of 19.15.17.13 NMAC purisements of	5.17.10 NMAC 19.15.17.13 NMAC ments of Subsection K of 19.15.17. the appropriate requirements of 19. 5.17.13 NMAC AC case on-site closure standards cann NMAC NMAC	11 NMAC 15.17.11 NMAC
17. Operator Application Certification:			
I hereby certify that the information submitted with this application i	is true, accurate and complete to	the best of my knowledge and beli	ef.
Name (Print):	Title:		
Signature:	Date:		
e-mail address:	Telephone:		
18. OCD Approval: Permit Application (including closure plan)	Closure P lan (only)	CD Conditions (see attachment)	
OCD Representative Signature:		Approval Date: 1/22//2	021
Title: Environmental Specialist	OCD Permit Nu		
19. Closure Report (required within 60 days of closure completion): Instructions: Operators are required to obtain an approved closure The closure report is required to be submitted to the division within section of the form until an approved closure plan has been obtaine	19.15.17.13 NMAC To plan prior to implementing an 60 days of the completion of the day and the closure activities have	y closure activities and submitting ne closure activities. Please do not	
20. Closure Method: ⊠ Waste Excavation and Removal □ On-Site Closure Method □ If different from approved plan, please explain.	Alternative Closure Metho	od Waste Removal (Closed-lo	oop systems only)
21. Closure Report Attachment Checklist: Instructions: Each of the mark in the box, that the documents are attached. □ Proof of Closure Notice (surface owner and division) □ Proof of Deed Notice (required for on-site closure for private language of the proof of Deed Notice (required for on-site closure for private language of the proof of Deed Notice (required for on-site closures and temporary pits) □ Confirmation Sampling Analytical Results (if applicable) □ Waste Material Sampling Analytical Results (required for on-site closures and Permit Number) □ Disposal Facility Name and Permit Number □ Soil Backfilling and Cover Installation	and only)	ed to the closure report. Please in	dicate, by a check
Re-vegetation Application Rates and Seeding Technique Site Reclamation (Photo Documentation) On-site Closure Location: Latitude	Longitude	NAD: □1927	7 □ 1082

22.			
Operator Closure	e Certification:		
I hereby certify the	at the information and attachments submitted with th	is closure report	is true, accurate and complete to the best of my knowledge and
belief. I also certi	fy that the closure complies with all applicable closu	re requirements a	and conditions specified in the approved closure plan.
Name (Print):	Tammy Jones	Title:	Operations/Regulatory Technician – Sr
Signature:	Tammy Jones		Date: <u>8/11/2020</u>
e-mail address:	tajones@hilcorp.com	Telephone:	(505) 324-5185

Hilcorp Energy Company San Juan Basin: New Mexico Assets Below Grade Tank Closure Report

Lease Name: SAN JUAN 28-6 UNIT NP 457 - BGT 2

API No.: 30-039-24997

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 Requirements:

1. Prior to initiating any BGT closure, except in the case of an emergency, HILCORP will notify the surface owner of the intent to close the BGT by certified mail no later than 72 hours or one week before closure and a copy of this notification will be included in the closure report. In the case of an emergency, the surface owner will be notified as soon as practical.

The surface owner was notified by email of the closure process and the notification is attached.

- 2. Notice of closure will be given to the District Division office between 72 hours and one week of the scheduled closure via email or phone. The notification of closure will include the following:
 - a. Operators Name
 - b. Well Name and API Number
 - c. Location

Notification is attached.

3. All liquids will be removed from the BGT following cessation of operation. Produced water will be disposed of at one of HILCORP's approved Salt Water Disposal facilities or at a District Division approved facility.

All recovered liquids were disposed of at an approved SWD facility or an approved District Division facility within 60 days of cessation of operation.

 Solids and sludge's will be shoveled and/or vacuumed out for disposal at one of the District Division approved facilities, depending on the proximity of the BGT site: Envirotech Land Farm (Permit #NM-01-011), JFJ Land Farm % Industrial Ecosystems Inc. (Permit #NM-01-0010B), and Basin Disposal (Permit #NM-01-005).

Any sludge or soil required to be removed to facilitate closure was transported to Envirotech Land Farm (Permit # NM-01-011) and/or JFJ Landfarm % IEI (Permit# NM-01-0010B).

Revised 10/14/2015

5. HILCORP will obtain prior approval from District Division to dispose, recycle, reuse, or reclaim the BGT and provide documentation of the disposition of the BGT in the closure report. Steel materials will be recycled or reused as approved by the District Division. Fiberglass tanks will be empty, cut up or shredded, and EPA cleaned for disposal as solid waste. Liner materials will be cleaned without soils or contaminated material for disposal as solid waste. Fiberglass tanks and liner materials will meet the conditions of 19.15.35 NMAC. Disposal will be at a licensed disposal facility, presently San Juan County Landfill operated by Waste Management under NMED Permit SWM-052426.

The below-grade tank was disposed of in a division-approved manner. The liner was cleaned per 19.15.35.8.C(1)(m) NMAC and disposed of at the San Juan County Regional Landfill located on CR 3100.

6. Any equipment associated with the BGT that is no longer required for some other purpose, following the closure, will be removed.

All on-site equipment associated with the below-grade tank was removed.

- 7. Following removal of the tank and any liner material, HILCORP will test the soils beneath the BGT as follows:
 - a. At a minimum, a five-point composite sample will be taken to include any obvious stained or wet soils or any other evidence of contamination.
 - b. The laboratory sample shall be analyzed for the constituents listed in Table I of 19.15.17.13.

A five point composite sample was taken of the below-grade tank using sampling tools and all samples tested per Table I of 19.15.17.13 and the results are attached.

8. If the District Division and/or HILCORP determine there is a release, HILCORP will comply with 19.15.17.13.C.3b.

A release was not determined for the above referenced well.

9. Upon completion of the tank removal, pursuant to 19.15.17.13.C.3c, if all contaminant concentrations are less than or equal to the parameters listed in Table I of 19.15.17.13 NMAC, the excavation will be backfilled with non-waste earthen material compacted and covered with a minimum of one foot top soil or background thickness whichever is greater and to existing grade. The surface will be re-contoured to match the native grade and to prevent ponding.

The tank removal area passed all requirements of Table I of 19.15.17.13 NMAC and was backfilled with compacted, non-waste containing, earthen material which included at least one foot of suitable material to establish vegetation at the site.

Revised 10/14/2015

10. For those portions of the former BGT area no longer required for production activities, HILCORP will seed the disturbed area the first favorable growing season after the BGT is covered. Seeding will be accomplished via drilling on the contour whenever practical, or by other District Division-approved methods. HILCORP will notify the District Division when reclamation and re-vegetation is complete.

Reclamation of the BGT shall be considered complete when:

- Vegetative cover reflects a life form ratio of +/- 50% of pre disturbance levels.
- Total percent plant cover of at least 70% of pre-disturbance levels (Excluding noxious weeds) OR
- Pursuant to 19.15.17.13.H.5d HILCORP will comply with obligations imposed by other applicable federal or tribal agencies in which there re-vegetation and reclamation requirements provide equal or better protection of fresh water, human health and the environment.

Provision 10 will be accomplished pursuant to 19.15.17.H.5d and notification will be submitted upon completion.

11. For those portions of the former BGT area required for production activities, reseeding will be done at well abandonment, and following the procedure noted above.

The former BGT area is required for production activities and reseeding will be completed upon plug and abandonment, per the procedure noted above.

Closure Report:

All closure activities will include proper documentation and will be submitted to OCD within 60 days of the BGT closure on a Closure Report using District Division Form C-144. The Report will include the following:

- Proof of Closure Notice (surface owner and District Division) (Attached)
- Backfilling & cover installation (See Report)
- Confirmation Sampling Analytical Results (Attached)
- Application Rate & Seeding techniques (See Report)
- Photo Documentation of Reclamation (Attached)

Tammy Jones

From: Tammy Jones

Sent: Thursday, July 23, 2020 3:12 PM

To: 'Smith, Cory, EMNRD'; 'Whitney Thomas - BLM (I1thomas@blm.gov)'; 'Adeloye,

Abiodun'; Durham, John, EMNRD; Kelly, Jonathan, EMNRD

Cc: Lisa Jones; Juanita Farrell; Trevor Coleman; Lindsay Dumas; Etta Trujillo; Sasha Khalaf;

Kurt Hoekstra; Kalan Dibble

Subject: 72 Hour BGT Closure Notification - San Juan 28-6 Unit NP 457

Follow Up Flag: Follow up Flag Status: Flagged

Subject: 72 Hour BGT Closure Notification

Anticipated Start Date: Tuesday, July 28th at approximately 9:00 a.m.

The subject well has a below-grade tank that will begin the closure process between 72 hours and one week from this notification. Please contact me at any time if you have any questions or concerns.

Well Name: San Juan 28-6 Unit NP 457

API#: 3003924997

Location: Unit B (NWNE), Section 20, T28N, R06W

Footages: 820' FNL & 1520' FEL

Operator: Hilcorp Surface Owner: FEDERAL (Lease #NMSF079193)

Reason: Unused BGT removal – (Lat: 36.651696 N, Long: -107.486155 W - NAD83)

Thank you,

Tammy Jones | **HILCORP ENERGY COMPANY** | San Juan East Regulatory | 505.324.5185 | tajones@hilcorp.com

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1625 N. French Dr., Hobbs, NM 88240
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811 S. First St., Artesia, NM 88210
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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

D "11 D				OCRIP	272171		
Responsible Pa		corp Energy Comp	oany	OGRID	372171		
Contact Name	•				Telephone (505) 324-5185		
Contact email	tajones	a@hilcorp.com		Incident #	[‡] (assigned by OCD)		
Contact mailin	g address	382 Road 3100	Aztec NM 8741	0			
			Location	of Release S	ource		
Latitude			Longitude (NAD 83 in deci	mal degrees to 5 deci	imal places)		
Site Name SA	N JUAN 2	8-6 UNIT NP 457	- BGT 2	Site Type	Gas Well		
Date Release D	iscovered	N/A		API# (if ap	plicable) 3003924997		
Unit Letter	Section	Township	Range	Cou	nty		
В	20	28N	6W	RIO AF	•		
	Material	l(s) Released (Select al	Nature and I that apply and attach c		Kelease c justification for the volumes prov	ided below)	
Crude Oil	Materia	Volume Release		alculations of specifi	Volume Recovered (bbls		
Produced V	Vater	Volume Release	d (bbls)		Volume Recovered (bbls)	
		Is the concentrat	ion of dissolved ch >10,000 mg/l?	loride in the	Yes No		
Condensate	:	Volume Release			Volume Recovered (bbls)		
Natural Gas	S	Volume Release	d (Mcf)		Volume Recovered (Mcf)		
Other (desc	eribe)	Volume/Weight	Released (provide	units)	Volume/Weight Recover	ed (provide units)	
Cause of Relea	ıse	<u> </u>					
		d during the BGT (Closure.				

Received by OCD: 8/11/2020 1:38:04 PM State of New Mexico
Page 2 Oil Conservation Division

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Page	12	m	- 21	
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Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by	If YES, for what reason(s) does th	ne responsible party consider this a major release?
19.15.29.7(A) NMAC?		
☐ 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		
	Init	tial Response
The responsible p	party must undertake the following actions in	mmediately 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 hea	alth and the environment.
Released materials ha	we been contained via the use of be	erms or dikes, absorbent pads, or other containment devices.
☐ All free liquids and re	ecoverable materials have been remo	oved and managed appropriately.
If all the actions described	d above have <u>not</u> been undertaken, e	explain why:
		mence remediation immediately after discovery of a release. If remediation
		emedial efforts have been successfully completed or if the release occurred MAC), please attach all information needed for closure evaluation.
		te to the best of my knowledge and understand that pursuant to OCD rules and
public health or the environr	nent. The acceptance of a C-141 report	ease notifications and perform corrective actions for releases which may endanger to by the OCD does not relieve the operator of liability should their operations have
failed to adequately investige addition, OCD acceptance of	ate and remediate contamination that po f a C-141 report does not relieve the ope	ose a threat to groundwater, surface water, human health or the environment. In erator of responsibility for compliance with any other federal, state, or local laws
and/or regulations.		
Printed Name: Tammy	Jones	Title: Operations/Regulatory Technician – Sr.
Signature:	uny Jones	Date: <u>8/11/2020</u>
email:	tajones@hilcorp.com	Telephone:(505)324-5185
	-	
OCD Only		
-		Deter
keceived by:		Date:



ANALYTICAL REPORT

August 05, 2020

HilCorp-Farmington, NM

Sample Delivery Group: L1245031 Samples Received: 07/30/2020

Project Number:

Description: San Juan 28-6 Unit NP 457

Site: SJ 28-6 UNIT NP 457

Report To: Lindsay Dumas

382 Road 3100

Aztec, NM 87401

¹Cp

²Tc















Entire Report Reviewed By:

He sults relate only to the items tested or calibrated and are reported as rounded values. This test report shall not be reproduced, except in full, without written approval of the laboratory. Where applicable, sampling conducted by Proc. P

Cp: Cover Page	1
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Collected by

Collected date/time Received date/time

BGT PIT L1245031-01 Solid			K Hoekstra	07/28/20 09:05	07/30/20 09	:00
Method	Batch	Dilution	Preparation	Analysis	Analyst	Location
			date/time	date/time		
Wet Chemistry by Method 300.0	WG1518249	1	08/01/20 10:00	08/02/20 00:13	MCG	Mt. Juliet, TN
Volatile Organic Compounds (GC) by Method 8015/8021	WG1519076	1	07/31/20 18:33	08/02/20 14:08	JHH	Mt. Juliet, TN
Semi-Volatile Organic Compounds (GC) by Method 8015	WG1519555	1	08/04/20 10:14	08/04/20 18:45	FM	Mt. Juliet. TN



















All sample aliquots were received at the correct temperature, in the proper containers, with the appropriate preservatives, and within method specified holding times, unless qualified or notated within the report. Where applicable, all MDL (LOD) and RDL (LOQ) values reported for environmental samples have been corrected for the dilution factor used in the analysis. All Method and Batch Quality Control are within established criteria except where addressed in this case narrative, a non-conformance form or properly qualified within the sample results. By my digital signature below, I affirm to the best of my knowledge, all problems/anomalies observed by the laboratory as having the potential to affect the quality of the data have been identified by the laboratory, and no information or data have been knowingly withheld that would affect the quality of the data.

















ONE LAB. NAT Page 17 of 27 SAMPLE RESULTS - 01

Collected date/time: 07/28/20 09:05

Wet Chemistry by Method 300.0

	<u>'</u>				
	Result	Qualifier RDL	Dilution	Analysis	Batch
Analyte	mg/kg	mg/kg		date / time	
Chloride	ND	20.0	1	08/02/2020 00:13	WG1518249



	Result	Qualifier	RDL	Dilution	Analysis	Batch
Analyte	mg/kg		mg/kg		date / time	
Benzene	ND		0.000500	1	08/02/2020 14:08	WG1519076
Toluene	ND		0.00500	1	08/02/2020 14:08	WG1519076
Ethylbenzene	ND		0.000500	1	08/02/2020 14:08	WG1519076
Total Xylene	ND		0.00150	1	08/02/2020 14:08	WG1519076
TPH (GC/FID) Low Fraction	ND		0.100	1	08/02/2020 14:08	WG1519076
(S) a,a,a-Trifluorotoluene(FID)	90.4		77.0-120		08/02/2020 14:08	WG1519076
(S) a,a,a-Trifluorotoluene(PID)	99.3		72.0-128		08/02/2020 14:08	WG1519076



Cn

СQс

GI

Semi-Volatile Organic Compounds (GC) by Method 8015

	Result	Qualifier	RDL	Dilution	Analysis	<u>Batch</u>
Analyte	mg/kg		mg/kg		date / time	
C10-C28 Diesel Range	7.00		4.00	1	08/04/2020 18:45	WG1519555
C28-C40 Oil Range	29.2		4.00	1	08/04/2020 18:45	WG1519555
(S) o-Terphenyl	80.4		18.0-148		08/04/2020 18:45	WG1519555





QUALITY CONTROL SUMMARY

ONE LAB. NAT Page 18 of 27

Wet Chemistry by Method 300.0

L1245031-01

Method Blank (MB)

(MB) R3555550-1 08/01/2	20 12:46			
	MB Result	MB Qualifier	MB MDL	MB RDL
Analyte	mg/kg		mg/kg	mg/kg
Chloride	U		9.20	20.0





L1244955-01 Original Sample (OS) • Duplicate (DUP)

(OC) 112440FF 01	00/01/20 10:07	/DI 1D	DOLLECTO	00/01/20 10/20
(OS) L1244955-01	00/01/20 10.07 •	(DUP)) K3333330-3	06/01/20 16.30

	Original Result	DUP Result	Dilution	DUP RPD	DUP Qualifier	DUP RPD Limits
Analyte	mg/kg	mg/kg		%		%
Chloride	ND	ND	1	0.000		20





Original Sample (OS) • Duplicate (DUP)

(OS) • (DUP) R3555550-6 08/01/20 23:50

	Original Result	DUP Result	Dilution	DUP RPD	DUP Qualifier	DUP RPD Limits
Analyte		mg/kg		%		%
Chloride		180	1	7.50		20





Laboratory Control Sample (LCS)

(LCS) R3555550-2	08/01/20	13:09
------------------	----------	-------

,	Spike Amount	LCS Result	LCS Rec.	Rec. Limits	LCS Qualifier
Analyte	mg/kg	mg/kg	%	%	
Chloride	200	198	98.9	90.0-110	

L1244096-01 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1244096-01 08/01/20 14:40	• (MS) R3555550-3 08/01/20 15:03 •	(MSD) R3555550-4 08/01/20 15:26
---------------------------------	------------------------------------	---------------------------------

(03) 1244030 01 ((03) E1244030 01 00/01/20 14.40 1 (M3) 10333330 0 00/01/20 13.03 1 (M32) 10333330 4 00/01/20 13.20												
	Spike Amount	Original Result	MS Result	MSD Result	MS Rec.	MSD Rec.	Dilution	Rec. Limits	MS Qualifier	MSD Qualifier	RPD	RPD Limits	
Analyte	mg/kg	mg/kg	mg/kg	mg/kg	%	%		%			%	%	
Chloride	500	78.2	553	552	95.0	94.7	1	80.0-120			0.277	20	

Volatile Organic Compounds (GC) by Method 8015/8021

QUALITY CONTROL SUMMARY

ONE LAB. NAT Page 19 of 27

L1245031-01

Method Blank (MB)

(MB) R3555645-3 08/02	2/20 09:13			
	MB Result	MB Qualifier	MB MDL	MB RDL
Analyte	mg/kg		mg/kg	mg/kg
Benzene	U		0.000120	0.000500
Toluene	U		0.000150	0.00500
Ethylbenzene	U		0.000110	0.000500
Total Xylene	U		0.000460	0.00150
TPH (GC/FID) Low Fraction	U		0.0217	0.100
(S) a,a,a-Trifluorotoluene(FID)	94.0			77.0-120
(S) a,a,a-Trifluorotoluene(PID)	106			72.0-128

Laboratory Control Sample (LCS)

(LCS) R3555645-1 08/02	2/20 08:11					
	Spike Amount	LCS Result	LCS Rec.	Rec. Limits	LCS Qualifier	
Analyte	mg/kg	mg/kg	%	%		
Benzene	0.0500	0.0502	100	76.0-121		
Toluene	0.0500	0.0512	102	80.0-120		
Ethylbenzene	0.0500	0.0455	91.0	80.0-124		
Total Xylene	0.150	0.128	85.3	37.0-160		
(S) a,a,a-Trifluorotoluene(FID)			92.1	77.0-120		
(S) a,a,a-Trifluorotoluene(PID)			98.2	72.0-128		

Laboratory Control Sample (LCS)

(LCS) R3555645-2 08/02/20 08:32								
	Spike Amount	LCS Result	LCS Rec.	Rec. Limits	LCS Qualifier			
Analyte	mg/kg	mg/kg	%	%				
TPH (GC/FID) Low Fraction	5.50	4.93	89.6	72.0-127				
(S) a,a,a-Trifluorotoluene(FID)			107	77.0-120				
(S) a,a,a-Trifluorotoluene(PID)			105	72.0-128				





QUALITY CONTROL SUMMARY

ONE LAB. NATI Page 20 of 27

L1245031-01

Semi-Volatile Organic Compounds (GC) by Method 8015

Method Blank (MB)

(MB) R3556328-1 08/04/20 17:41					
	MB Result	MB Qualifier	MB MDL	MB RDL	
Analyte	mg/kg		mg/kg	mg/kg	
C10-C28 Diesel Range	U		1.61	4.00	
C28-C40 Oil Range	U		0.274	4.00	
(S) o-Terphenyl	80.9			18.0-148	





Laboratory Control Sample (LCS)

(LCS) R3556328-2 08/04	(LCS) R3556328-2 08/04/20 17:53							
	Spike Amount	LCS Result	LCS Rec.	Rec. Limits	LCS Qualifier			
Analyte	mg/kg	mg/kg	%	%				
C10-C28 Diesel Range	50.0	40.9	81.8	50.0-150				
(S) o-Terphenyl			93.2	18.0-148				











Guide to Reading and Understanding Your Laboratory Report

The information below is designed to better explain the various terms used in your report of analytical results from the Laboratory. This is not intended as a comprehensive explanation, and if you have additional questions please contact your project representative.

Results Disclaimer - Information that may be provided by the customer, and contained within this report, include Permit Limits, Project Name, Sample ID, Sample Matrix, Sample Preservation, Field Blanks, Field Spikes, Field Duplicates, On-Site Data, Sampling Collection Dates/Times, and Sampling Location. Results relate to the accuracy of this information provided, and as the samples are received.

Abbreviations and Definitions

Appleviations and	d Definitions
MDL	Method Detection Limit.
ND	Not detected at the Reporting Limit (or MDL where applicable).
RDL	Reported Detection Limit.
Rec.	Recovery.
RPD	Relative Percent Difference.
SDG	Sample Delivery Group.
(S)	Surrogate (Surrogate Standard) - Analytes added to every blank, sample, Laboratory Control Sample/Duplicate and Matrix Spike/Duplicate; used to evaluate analytical efficiency by measuring recovery. Surrogates are not expected to be detected in all environmental media.
U	Not detected at the Reporting Limit (or MDL where applicable).
Analyte	The name of the particular compound or analysis performed. Some Analyses and Methods will have multiple analytes reported.
Dilution	If the sample matrix contains an interfering material, the sample preparation volume or weight values differ from the standard, or if concentrations of analytes in the sample are higher than the highest limit of concentration that the laboratory can accurately report, the sample may be diluted for analysis. If a value different than 1 is used in this field, the result reported has already been corrected for this factor.
Limits	These are the target % recovery ranges or % difference value that the laboratory has historically determined as normal for the method and analyte being reported. Successful QC Sample analysis will target all analytes recovered or duplicated within these ranges.
Original Sample	The non-spiked sample in the prep batch used to determine the Relative Percent Difference (RPD) from a quality control sample. The Original Sample may not be included within the reported SDG.
Qualifier	This column provides a letter and/or number designation that corresponds to additional information concerning the result reported. If a Qualifier is present, a definition per Qualifier is provided within the Glossary and Definitions page and potentially a discussion of possible implications of the Qualifier in the Case Narrative if applicable.
Result	The actual analytical final result (corrected for any sample specific characteristics) reported for your sample. If there was no measurable result returned for a specific analyte, the result in this column may state "ND" (Not Detected) or "BDL" (Below Detectable Levels). The information in the results column should always be accompanied by either an MDL (Method Detection Limit) or RDL (Reporting Detection Limit) that defines the lowest value that the laboratory could detect or report for this analyte.
Uncertainty (Radiochemistry)	Confidence level of 2 sigma.
Case Narrative (Cn)	A brief discussion about the included sample results, including a discussion of any non-conformances to protocol observed either at sample receipt by the laboratory from the field or during the analytical process. If present, there will be a section in the Case Narrative to discuss the meaning of any data qualifiers used in the report.
Quality Control Summary (Qc)	This section of the report includes the results of the laboratory quality control analyses required by procedure or analytical methods to assist in evaluating the validity of the results reported for your samples. These analyses are not being performed on your samples typically, but on laboratory generated material.
Sample Chain of Custody (Sc)	This is the document created in the field when your samples were initially collected. This is used to verify the time and date of collection, the person collecting the samples, and the analyses that the laboratory is requested to perform. This chain of custody also documents all persons (excluding commercial shippers) that have had control or possession of the samples from the time of collection until delivery to the laboratory for analysis.
Sample Results (Sr)	This section of your report will provide the results of all testing performed on your samples. These results are provided by sample ID and are separated by the analyses performed on each sample. The header line of each analysis section for each sample will provide the name and method number for the analysis reported.
Sample Summary (Ss)	This section of the Analytical Report defines the specific analyses performed for each sample ID, including the dates and times of preparation and/or analysis.

Qualifier Description

The remainder of this page intentionally left blank, there are no qualifiers applied to this SDG.

















Pace National is the only environmental laboratory accredited/certified to support your work nationwide from one location. One phone call, one point of contact, one laboratory. No other lab is as accessible or prepared to handle your needs throughout the country. Our capacity and capability from our single location laboratory is comparable to the collective totals of the network laboratories in our industry. The most significant benefit to our one location design is the design of our laboratory campus. The model is conducive to accelerated productivity, decreasing turn-around time, and preventing cross contamination, thus protecting sample integrity. Our focus on premium quality and prompt service allows us to be YOUR LAB OF CHOICE.

* Not all certifications held by the laboratory are applicable to the results reported in the attached report.

* Accreditation is only applicable to the test methods specified on each scope of accreditation held by Pace National.

State Accreditations

Otate / tool caltations	
Alabama	40660
Alaska	17-026
Arizona	AZ0612
Arkansas	88-0469
California	2932
Colorado	TN00003
Connecticut	PH-0197
Florida	E87487
Georgia	NELAP
Georgia ¹	923
Idaho	TN00003
Illinois	200008
Indiana	C-TN-01
lowa	364
Kansas	E-10277
Kentucky 16	90010
Kentucky ²	16
Louisiana	Al30792
Louisiana ¹	LA180010
Maine	TN0002
Maryland	324
Massachusetts	M-TN003
Michigan	9958
Minnesota	047-999-395
Mississippi	TN00003
Missouri	340
Montana	CERT0086

Nebraska	NE-OS-15-05
Nevada	TN-03-2002-34
New Hampshire	2975
New Jersey-NELAP	TN002
New Mexico ¹	n/a
New York	11742
North Carolina	Env375
North Carolina ¹	DW21704
North Carolina ³	41
North Dakota	R-140
Ohio-VAP	CL0069
Oklahoma	9915
Oregon	TN200002
Pennsylvania	68-02979
Rhode Island	LAO00356
South Carolina	84004
South Dakota	n/a
Tennessee 1 4	2006
Texas	T104704245-18-15
Texas ⁵	LAB0152
Utah	TN00003
Vermont	VT2006
Virginia	460132
Washington	C847
West Virginia	233
Wisconsin	9980939910
Wyoming	A2LA

Third Party Federal Accreditations

A2LA – ISO 17025	1461.01
A2LA – ISO 17025 ⁵	1461.02
Canada	1461.01
EPA-Crypto	TN00003

AIHA-LAP,LLC EMLAP	100789
DOD	1461.01
USDA	P330-15-00234

¹ Drinking Water ² Underground Storage Tanks ³ Aquatic Toxicity ⁴ Chemical/Microbiological ⁵ Mold ⁶ Wastewater n/a Accreditation not applicable

Our Locations

Pace National has sixty-four client support centers that provide sample pickup and/or the delivery of sampling supplies. If you would like assistance from one of our support offices, please contact our main office. Pace National performs all testing at our central laboratory.











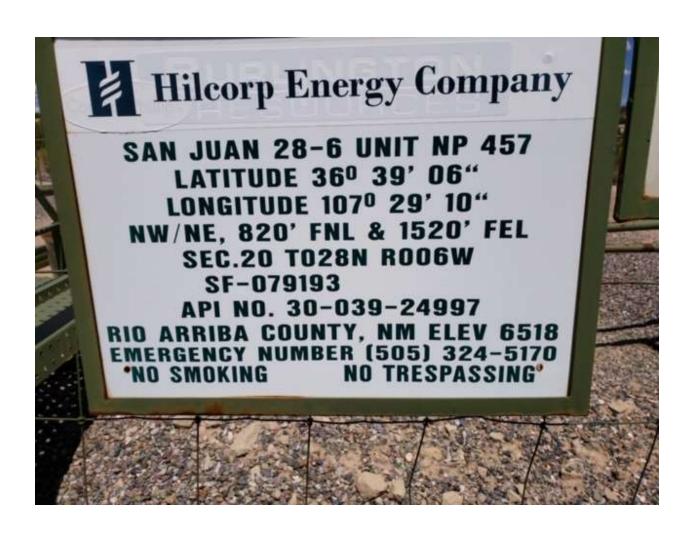








ceived by OCD: 8/11/2020	2.00.07 I II.		Billing Information:					45.4	- 1	Analysis / Container / Preservative					Chain	of Custody	Page 23
			ATTN: L	indsay Dum	as	Pres Chk		7							-/-	Pace A National Cent	nalytical [®] er for Testing & Innovetion
Report to: Lindsay Dumas Project			Email To: Idumas@hilcorp.com; khooketra@hilcorp.com City/State				±								12065 Lebanon Rd Mount Juliet, TN 3712: Phone: 615-758-5858 Phone: 800-767-5859		4 4 4 4 4
escription: San Juan 28-6 Unit	Client Project	#		Collected: Az	tec, NM	4	MRO								P	124	5031
ollected by (print):	Site/Facility ID #			P.O.#			GRO,	GRO,							12700	H169	
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mmediately vacked on Ice N_ Y_X	Same Day 5 Day (Rad Only) Two Day 10 Day (Rad Only) Three Day			Date Results Needed		No.	-8015	BTEX 8021	ride 30						TSR:		
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Relinquished by : (Signature)						ă				1.4-	1= 3						







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

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 9614

CONDITIONS OF APPROVAL

Operator:			OGRID:	Action Number:	Action Type:
HILCORP ENERGY COMPANY	1111 Travis Street	Houston, TX77002	372171	9614	C-144

OCD Reviewer	Condition
csmith	BGT 2 @ 30-039-24997