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.

Sunta 1 6, 1111 67302 to the appropriate 1111002 21state office.
BGT 1 Proposed Alternative Method Permit or Closure Plan Application
Type of action: Below grade tank registration Permit of a pit or proposed alternative method Closure of a pit, below-grade tank, or proposed alternative method Modification to an existing permit/or registration Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method
Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request
lease be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the nvironment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.
Operator: Hilcorp Energy Company OGRID #: 372171
Address: _382 Road 3100
Facility or well name: Huerfano Unit Com 518
API Number: 30-045-29175 OCD Permit Number: #13251
U/L or Qtr/Qtr N Section 16 Township 26N Range 09W County: San Juan
Center of Proposed Design: Latitude 36.483272 Longitude 107.797547 NAD83
Surface Owner: Federal X State Private Tribal Trust or Indian Allotment
Pit: Subsection F, G or J of 19.15.17.11 NMAC Temporary: □ Drilling □ Workover □ Permanent □ Emergency □ Cavitation □ P&A □ Multi-Well Fluid Management □ Low Chloride Drilling Fluid □ yes □ no □ Lined □ Unlined □ Liner type: Thicknessmil □ LLDPE □ PVC □ Other □ String-Reinforced Liner Seams: □ Welded □ Factory □ Other Volume:bbl Dimensions: L x W x D
Liner Seams:
Below-grade tank: Subsection I of 19.15.17.11 NMAC Volume:
4. Alternative Method: Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.
Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks) Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, hospital, institution or church) Four foot height, four strands of barbed wire evenly spaced between one and four feet

☐ Alternate. Please specify

6			
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)			
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			
Nariances and Exceptions: Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance. Please check a box if one or more of the following is requested, if not leave blank: □ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval. □ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.			
9. <u>Siting Criteria (regarding permitting)</u> : 19.15.17.10 NMAC <i>Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of accept material are provided below.</i> Siting criteria does not apply to drying pads or above-grade tanks.	otable source		
General siting			
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☒ NA		
<u>Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.</u> NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No 図 NA		
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (Does not apply to below grade tanks) - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No		
Within the area overlying a subsurface mine. (Does not apply to below grade tanks) - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No		
 Within an unstable area. (Does not apply to below grade tanks) Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map 	☐ Yes ☐ No		
Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map			
Below Grade Tanks			
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes 🏻 No		
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site			
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, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.) - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No		
Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.			
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image			
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No		

Within 100 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit Non-low chloride drilling fluid	
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Permanent Pit or Multi-Well Fluid Management Pit	
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa	
lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.	
- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
10. Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 N	IMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doc 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 19.15.17.11 NMAC	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	15.17.9 NMAC
Previously Approved Design (attach copy of design) API Number: or Permit Number:	
11. Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC	
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doc attached.	cuments are
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	.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 attached.	documents are		
☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC			
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC ☐ Climatological Factors Assessment			
Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC			
☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC ☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC			
Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC			
 Quality Control/Quality Assurance Construction and Installation Plan Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC 			
☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC ☐ Nuisance or Hazardous Odors, including H ₂ S, Prevention Plan			
☐ Emergency Response Plan			
☐ Oil Field Waste Stream Characterization ☐ Monitoring and Inspection Plan			
☐ Erosion Control Plan			
Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC			
13. Proposed Closure: 19.15.17.13 NMAC			
Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.			
Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-well Fl	uid Management Pit		
Proposed Closure Method: X Waste Excavation and Removal			
☐ Waste Removal (Closed-loop systems only)☐ On-site Closure Method (Only for temporary pits and closed-loop systems)			
☐ In-place Burial ☐ 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 a 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. P. 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			
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			
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			
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			
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 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			
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; Written	n approval obtained from the municipality	☐ Yes ☐ No			
Within the area overlying a subsurface mine Written confirmation or verification or map from the NM EMNRD	D-Mining and Mineral Division	☐ Yes ☐ No			
Within an unstable area Engineering measures incorporated into the design; NM Bureau of	Geology & Mineral Resources; USGS; NM Geological				
Society; Topographic map		☐ Yes ☐ No			
Within a 100-year floodplain FEMA map		☐ Yes ☐ No			
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached. Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.13 NMAC 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 19.15.17.13 NMAC Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC Sicil Cover Design - 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					
Operator Application Certification: I hereby certify that the information submitted with this application is true,	, accurate and complete to the best of my knowledge and	belief.			
Name (Print):	Title:				
Signature:	Date:				
e-mail address:	Telephone:				
18. OCD Approval: ☐ Permit Application (including closure plan) X Clo	sure Plan (only) OCD Conditions (see attachment)				
OCD Representative Signature:	Approval Date: <u>3/3</u>	80/2021			
Title: Environmental Specialist	OCD Permit Number: BGT 1				
19. Closure Report (required within 60 days of closure completion): 19.15 Instructions: Operators are required to obtain an approved closure plan The closure report is required to be submitted to the division within 60 days section of the form until an approved closure plan has been obtained and	prior to implementing any closure activities and submi sys of the completion of the closure activities. Please do	not complete this			
20. Closure Method: Waste Excavation and Removal □ On-Site Closure Method □ A If different from approved plan, please explain.	Alternative Closure Method Waste Removal (Close	ed-loop systems only)			
21. Closure Report Attachment Checklist: Instructions: Each of the follow 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 land or ☐ Plot Plan (for on-site closures and temporary pits) ☐ Confirmation Sampling Analytical Results (if applicable) ☐ Waste Material Sampling Analytical Results (required for on-site closures)		se indicate, by a check			

22.				
Operator Closu	re Certification:			
	hat the information and attachments submitted with this closure repo			
belief. I also cer	tify that the closure complies with all applicable closure requirement	s and condi	itions s _I	pecified in the approved closure plan.
Name (Print):	Cherylene Weston	Title:	Oper	ations/Regulatory Technician-Sr.
Signature:	Cherylene Weston	Date	e:	08/19/2020
e-mail address:_	cweston@hilcorp.com	Telepho	ne:	505-564-0779

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

Lease Name: Huerfano Unit Com 518

API No.: 30-045-29175

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)

Cheryl Weston

From: Cheryl Weston

Sent: Wednesday, July 1, 2020 9:43 AM

To: 'Smith, Cory, EMNRD'; 'dvstrang@slo.state.nm.us'

Cc: Kandis Roland; Kurt Hoekstra; Curtis House; Clara Cardoza; Cary Green **Subject:** 72 Hour notification - Huerfano Unit Com 518 (API 30-045-29175)

Subject: 72 Hour BGT Closure Notification

Anticipated Start Date: Monday, July 6, 2020 at approximately 11:00 a.m.

The subject well has <u>one</u> 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: Huerfano Unit Com 518

API#: 30-045-29175

Location: Unit N (SESW), Section 16, T26N, R09W

Footages: 890' FSL & 1545' FWL

Operator: Hilcorp Energy Surface Owner: State (Lease B-9320-10)

Reason: Fiberglass tank was permitted as 120 bbl metal by previous operator; OCD requested closure.

Thanks,

Cheryl Weston
San Juan South Regulatory
505-564-0779
cweston@hilcorp.com



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-141 Revised August 24, 2018 Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

			Kesp	onsible I alt	y		
Responsible Party Hilcorp Energy Company			pany	OGRID	OGRID 372171		
Contact Name Cherylene Weston				Contact Te	Contact Telephone (505) 564-0779		
Contact email	l cwesto	on@hilcorp.com		Incident #	(assigned by OCD)		
Contact maili	ng address	382 Road 3100	Aztec NM 8741	0			
			Location	of Release So	ource		
Latitude	36.48327	2		Longitude _	-107.797547		
			(NAD 83 in dec	imal degrees to 5 decin	nal places)		
Site Name Hu	uerfano Un	it Com #518		Site Type	Gas Well		
Date Release I	Discovered	N/A		API# (if app	olicable) 30-045-29175		
Unit Letter	Section	Township	Range	Coun	ntv		
N	16	26N	9W	SAN JU	-		
Surface Owner			Nature and	Volume of I	Release justification for the volumes provided below)		
Crude Oil		Volume Release	ed (bbls)		Volume Recovered (bbls)		
Produced	Produced Water Volume Released (bbls)			Volume Recovered (bbls)			
Is the concentration of dissolved chlorid produced water >10,000 mg/l?		nloride in the	☐ Yes ☐ No				
Condensat	te	Volume Release	ed (bbls)		Volume Recovered (bbls)		
Natural Gas Volume Released (Mcf)			Volume Recovered (Mcf)				
Other (describe) Volume/Weight Released (provide units		units)	Volume/Weight Recovered (provide units)				
Cause of Rele	ase				<u></u>		
No release was	s encountere	d during the BGT	Closure.				

Received by OCD: 8/20/2020 12:22:55 PM State of New Mexico Page 2 Oil Conservation Division

D	12		200
rage	12	o_{I}	20

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by	If YES, for what reason(s) does	the responsible par	ty consider this a major release?
19.15.29.7(A) NMAC?			
☐ Yes ⊠ No	N/A		
707772			
If YES, was immediate no	otice given to the OCD? By whor	n? To whom? Wh	en and by what means (phone, email, etc)?
Not Required			
	In	itial Respons	e
The responsible p	party must undertake the following actions	immediately unless the	y 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 h	ealth and the envir	onment.
Released materials ha	we been contained via the use of b	erms or dikes, abso	orbent pads, or other containment devices.
All free liquids and re	ecoverable materials have been rer	noved and manage	d appropriately.
If all the actions described	d above have <u>not</u> been undertaken,	, explain why:	
Per 19 15 29 8 B (4) NM	AC the responsible party may cor	nmence remediatio	n immediately after discovery of a release. If remediation
has begun, please attach a	a narrative of actions to date. If	remedial efforts ha	ve been successfully completed or if the release occurred ch all information needed for closure evaluation.
			knowledge and understand that pursuant to OCD rules and
			nd perform corrective actions for releases which may endanger not relieve the operator of liability should their operations have
failed to adequately investiga	ate and remediate contamination that p	pose a threat to grour	dwater, surface water, human health or the environment. In lity for compliance with any other federal, state, or local laws
and/or regulations.	r a C-141 report does not reneve the o	perator of responsion	inty for compniance with any other federal, state, or local laws
Printed Name:	Cherylene Weston	Title:	Operations/Regulatory Technician – Sr.
Signature: Cheryle	ne Weston	Date:	<u>08/19/2020</u> .
email: cwestor	n@hilcorp.com	Telephone:	(505) 564-0779
OCD Only			
Received by:		Date: _	



ANALYTICAL REPORT

July 14, 2020









Huerfano Unit Com 518 API# 30-045-29175











HilCorp-Farmington, NM

Sample Delivery Group:

L1237010

07/07/2020

Project Number:

Samples Received:

Description: **BGT Samples MULTIPLE** Site:

Report To: Clara Cardoza

382 Road 3100

Aztec, NM 87410

Entire Report Reviewed By:

Olivia Studebaker

Project Manager Results 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 Pace Analytical National is performed per guidance provided in laboratory standard operating procedures ENV-SOP-MTJL-0067 and ENV-SOP-MTJL-0068. Where sampling conducted by the customer, results relate to the accuracy of the information provided, and as the samples are received.

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Collected by

Collected date/time Received date/time

HUEFRANO UNIT COM 518 L1237010-01 Solid			C. Cardoza	07/06/20 11:25	07/07/20 08:4	15
Method	Batch	Dilution	Preparation	Analysis	Analyst	Location
			date/time	date/time		
Wet Chemistry by Method 300.0	WG1505529	1	07/09/20 16:09	07/10/20 04:02	MSP	Mt. Juliet, TN
Volatile Organic Compounds (GC) by Method 8015/8021	WG1507239	1	07/08/20 09:51	07/10/20 21:40	ADM	Mt. Juliet, TN
Semi-Volatile Organic Compounds (GC) by Method 8015	WG1506144	1	07/09/20 06:46	07/10/20 03:28	JN	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.



















HilCorp-Farmington, NM

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SAMPLE RESULTS - 01

Collected date/time: 07/06/20 11:25

Wet Chemistry by Method 300.0

	Result	Qualifier	RDL	Dilution	Analysis	Batch
Analyte	mg/kg		mg/kg		date / time	
Chloride	ND		20.0	1	07/10/2020 04:02	WG1505529

Volatile Organic Compounds (GC) by Method 8015/8021

	Result	Qualifier	RDL	Dilution	Analysis	<u>Batch</u>
Analyte	mg/kg		mg/kg		date / time	
Benzene	ND		0.000500	1	07/10/2020 21:40	WG1507239
Toluene	ND		0.00500	1	07/10/2020 21:40	WG1507239
Ethylbenzene	ND		0.000500	1	07/10/2020 21:40	WG1507239
Total Xylene	ND		0.00150	1	07/10/2020 21:40	WG1507239
TPH (GC/FID) Low Fraction	ND		0.100	1	07/10/2020 21:40	WG1507239
(S) a,a,a-Trifluorotoluene(FID)	103		77.0-120		07/10/2020 21:40	WG1507239
(S) a,a,a-Trifluorotoluene(PID)	99.1		72.0-128		07/10/2020 21:40	WG1507239



Ss

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	ND		4.00	1	07/10/2020 03:28	WG1506144				
C28-C40 Oil Range	ND		4.00	1	07/10/2020 03:28	WG1506144				
(S) o-Terphenyl	67.4		18.0-148		07/10/2020 03:28	WG1506144				



QUALITY CONTROL SUMMARY

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L1237010-01

Wet Chemistry by Method 300.0 Method Blank (MB)

(MB) R3548287-1 07/09/2	0 17:21			
	MB Result	MB Qualifier	MB MDL	MB RDL
Analyte	mg/kg		mg/kg	mg/kg
Chloride	U		9.20	20.0





Ss

L1236490-01 Original Sample (OS) • Duplicate (DUP)

(OC) 100C 400 01 07/00/20 10:00 (DLID) DOE 40007 0 07/00/20 0		
(OS) L1236490-01 07/09/20 19:38 • (DUP) R3548287-3 07/09/20 2	.U.UI	

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





L1236514-04 Original Sample (OS) • Duplicate (DUP)

(OS) L1236514-04 07/10/20 02:54 • (DLIP) R3548287-6 07/10/20 03:16

,	5) [12303] + 0+ 07/10/20	Original Result			DUP RPD	DUP Qualifier	DUP RPD Limits
Ana	alyte	mg/kg	mg/kg		%		%
Chl	oride	ND	ND	1	0.000		20





Laboratory Control Sample (LCS)

,	Spike Amount	LCS Result	LCS Rec.	Rec. Limits	LCS Qualifier
Analyte	mg/kg	mg/kg	%	%	
Chloride	200	196	98.1	90.0-110	

L1236490-09 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1236490-09 07/09/20 23:50	• (MS) R3548287-4 07/10/20 00:13 •	(MSD) R3548287-5 07/10/20 00:36
---------------------------------	------------------------------------	---------------------------------

	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	122	659	668	107	109	1	80.0-120			1.36	20

QUALITY CONTROL SUMMARY

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L1237010-01

Volatile Organic Compounds (GC) by Method 8015/8021

Method E	Blank (MB)
----------	------------

(MB) R3548500-3 07/10/20 16:22				
	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)	106			77.0-120
(S) a,a,a-Trifluorotoluene(PID)	104			72.0-128

Laboratory Control Sample (LCS)

(LCS) R3548500-1 07/10	/20 15:20					`
	Spike Amount	LCS Result	LCS Rec.	Rec. Limits	LCS Qualifier	<u> </u>
Analyte	mg/kg	mg/kg	%	%		8
Benzene	0.0500	0.0505	101	76.0-121		L
Toluene	0.0500	0.0542	108	80.0-120		9
Ethylbenzene	0.0500	0.0553	111	80.0-124		
Total Xylene	0.150	0.164	109	37.0-160		-
(S) a,a,a-Trifluorotoluene(FID)			107	77.0-120		
(S) a,a,a-Trifluorotoluene(PID)			102	72.0-128		

Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) R3548500-2 07/10/20 15:41 • (LCSD) R3548500-4 07/10/20 17:11											
	Spike Amount	LCS Result	LCSD Result	LCS Rec.	LCSD Rec.	Rec. Limits	LCS Qualifier	LCSD Qualifier	RPD	RPD Limits	
Analyte	mg/kg	mg/kg	mg/kg	%	%	%			%	%	
TPH (GC/FID) Low Fraction	5.50	6.09	5.26	111	95.6	72.0-127			14.6	20	
(S) a,a,a-Trifluorotoluene(FID)				101	98.0	77.0-120					
(S) a,a,a-Trifluorotoluene(PID)				110	107	72.0-128					

(S) a,a,a-Trifluorotoluene(PID)

QUALITY CONTROL SUMMARY

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Volatile Organic Compounds (GC) by Method 8015/8021

L1237010-01

L1236065-04 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1236065-04 07/10	/20 19:36 • (MS)	R3548500-5 (07/11/20 04:14	• (MSD) R3548	500-6 07/11/	20 04:35						
	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	%	%		%			%	%
Benzene	1.31	ND	1.13	1.11	99.8	98.1	25	10.0-155			1.79	32
Toluene	1.31	ND	1.20	1.18	106	104	25	10.0-160			1.68	34
Ethylbenzene	1.31	ND	1.22	1.19	109	106	25	10.0-160			2.49	32
Total Xylene	3.91	ND	3.54	3.46	106	103	25	10.0-160			2.29	32
(S) a,a,a-Trifluorotoluene(FID)					107	106		77.0-120				

72.0-128

100

99.5

















Semi-Volatile Organic Compounds (GC) by Method 8015

QUALITY CONTROL SUMMARY

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L1237010-01

Method Blank (MB)

(MB) R3548075-1 07/10/20 00:06						
	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	0.425	<u>J</u>	0.274	4.00		
(S) o-Terphenyl	73.1			18.0-148		











(LCS) R3548075-2 07/10	0/20 00:20				
	Spike Amount	LCS Result	LCS Rec.	Rec. Limits	LCS Qualifier
Analyte	mg/kg	mg/kg	%	%	
C10-C28 Diesel Range	50.0	34.3	68.6	50.0-150	
(S) o-Terphenyl			70.1	18.0-148	









(OS) L1236971-06 07/10/20 01:13 • (MS) R3548075-3 07/10/20 01:26 • (MSD) R3548075-4	07/10/20 01:40

(00) 21200071 00 07710	/20 01.10 (1110) 1	(00100700007	710720 01.20	(14102) 1100 101	370 1 0771072	20 01.10						
	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	%	%		%			%	%
C10-C28 Diesel Range	50.0	ND	39.3	36.3	74.9	68.9	1	50.0-150			7.94	20
(S) o-Terphenyl					70.4	67.6		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	a Delimitions
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 identification of the analyte is acceptable; the reported value is an estimate.

























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

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.



















Huerfano Unit Com 518 API#: 30-045-29175 Lease: B-9320-10

The above well's fiberglass below grade tank was registered as a metal tank in 2015 by the previous Operator. NMOCD requested closure of the BGT permit. The tank was reset above grade.









<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 9786

CONDITIONS OF APPROVAL

Operator:			OGRID:	Action Number:	Action Type:
HILCORP ENERGY COMPANY	1111 Travis Street	Houston, TX77002	372171	9786	C-144

OCD	Condition
Reviewer	
csmith	Closure Report Approved, Operator reset Fiberglass BGT to be above grade. If the tank is not above grade and meets the requires of a BGT per 19.15.17 NMAC operator maybe required to reregister
	the tank.