

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 NMOC District Office.
For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOC District Office.

Pit, Below-Grade Tank, or
Proposed Alternative Method Permit or Closure Plan Application

Type of action: ☐ Below grade tank registration
☐ Permit of a pit or proposed alternative method
BGT1 ☒ 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

Please 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 environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.
Operator: Hilcorp Energy Company OGRID #: 372171
Address: 382 Road 3100 Aztec, NM 87410
Facility or well name: Rhodes C 102
API Number: 30-045-28944 OCD Permit Number: _____
U/L or Qtr/Qtr B Section 31 Township 28N Range 11W County: San Juan
Center of Proposed Design: Latitude 36.62376 Longitude -108.04226 NAD27
Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

2.
☐ **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: Thickness _____ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other _____
☐ String-Reinforced
Liner Seams: ☐ Welded ☐ Factory ☐ Other _____ Volume: _____ bbl Dimensions: L _____ x W _____ x D _____

3.
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC
Volume: 120 bbl Type of fluid: Produced Water
Tank Construction material: Metal
☐ Secondary containment with leak detection ☒ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other _____
Liner type: Thickness _____ mil ☐ HDPE ☐ PVC ☒ Other Unspecified

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.

5.
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)

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.

Variances 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.

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 acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.*****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**Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.**

NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No☒ NAWithin 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 ☐ NoWithin 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 ☐ NoWithin 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 ☐ NoWithin 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 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☐ Yes ☒ No**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☐ Yes ☐ No

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 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 (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 NMAC
- ☐ 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
- ☐ 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 19.15.17.9 NMAC and 19.15.17.13 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 documents are 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 19.15.17.9 NMAC 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: _____

12.
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 H₂S, 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 Fluid Management Pit
☐ Alternative
- Proposed Closure Method: ☒ 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 attached to the 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 source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> 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; Written approval obtained from the municipality

☐ Yes ☐ No

Within the area overlying a subsurface mine.

- Written confirmation or verification or map from the NM EMNRD-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

16.

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 19.15.17.11 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
- ☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
- ☐ Soil 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

17.

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) ☒ Closure Plan (only) ☐ OCD Conditions (see attachment)

OCD Representative Signature: Jaclyn Burdine Approval Date: 03/24/2023

Title: Environmental Specialist-A OCD Permit Number: BGT1

19.

Closure Report (required within 60 days of closure completion): 19.15.17.13 NMAC

Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.

☒ **Closure Completion Date:** 12/20/2022

20.

Closure Method:

- ☒ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)
- ☐ If different from approved plan, please explain.

21.

Closure Report Attachment Checklist: *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check 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 only)
- ☐ Plot Plan (for on-site closures and temporary pits)
- ☒ Confirmation Sampling Analytical Results (if applicable)
- ☐ Waste Material Sampling Analytical Results (required for on-site closure)
- ☐ Disposal Facility Name and Permit Number
- ☒ Soil Backfilling and Cover Installation
- ☒ Re-vegetation Application Rates and Seeding Technique
- ☒ Site Reclamation (Photo Documentation)


On-site Closure Location: Latitude _____ Longitude _____ NAD: ☐ 1927 ☐ 1983

22.

Operator Closure Certification:

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): Amanda Walker Title: Operations/Regulatory Technician – Sr

Signature:  Date: 3/23/2023

e-mail address: mwalker@hilcorp.com Telephone: 346-237-2177

**Hilcorp Energy Company
San Juan Basin
Below Grade Tank Closure Report**

Lease Name: Rhodes C 102

API No.: 30-045-28944

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:

1. HILCORP shall close a below-grade tank within 60 days of cessation of operations per Subsection G.4 of 19.15.17.13 NMAC. This will include a) below-grade tanks that do not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC; b) an earlier date that the division requires because of imminent danger to fresh water, public health or the environment. For any closure, HILCORP will file the C144 Closure Report as required.

The below-grade tank referenced above was permitted and closed within 60 days of cessation of the below-grade tanks operation.

2. HILCORP shall remove liquids and sludge from a below-grade tank prior to implementing a closure method and shall dispose of the liquids and sludge in a division-approved facility. The facilities to be used will be Basin Disposal (Permit #NM-01-005), JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B) and Envirotech Land Farm (Permit #NM-01-011). The liner after being cleaned well (Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC) will be disposed of at the San Juan County Regional Landfill located on CR 3100.

All recovered liquids were disposed of at Basin Disposal (Permit #NM-01-005) and any sludge or soil required to be removed to facilitate closure was hauled to Envirotech Land Farm (Permit #NM-01-011) and JFJ Landfarm % IEI (Permit #NM-01-0010B). The liner was cleaned per Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC was disposed of at the San Juan County Regional Landfill located on CR 3100.

3. HILCORP will receive prior approval to remove the below-grade tank and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves.

The below-grade tank was disposed of in a division-approved manner.

4. If there is any on-site equipment associated with a below-grade tank, then HILCORP shall remove the equipment, unless the equipment is required for some other purpose.

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

5. HILCORP will test the soils beneath the below-grade tank to determine whether a release has occurred. HILCORP shall collect, at a minimum, a five point, composite sample; collect individual grab samples from any area that is wet, discolored or showing other evidence of a release; and analyzed for the constituents listed in Table I of 19.15.17.13 NMAC. Hilcorp shall notify the division of its results on form C-141.

3/23/2023

A five point composite sample was taken of the below-grade tank using sampling tools and all samples tested per Subsection B of 19.15.17.1 3(B)(1)(b). (Sample results attached). Form C-141 is attached.

Components	Tests Method	Limit (mg/kg)
Benzene	EPA SW-846 8021B or 8260B	0.2
BTEX	EPA SW-846 8021B or 8260B	50
TPH	EPA SW-846 418.1	100
Chlorides	EPA 300.0	250

6. If HILCORP or the division determines that a release has occurred, then HILCORP shall comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC, as appropriate.

A release **was** determined for the above referenced well.

7. If the sampling program demonstrates that a release has not occurred or that any release does not exceed the concentrations specified in Table I of 19.15.17.13 NMAC, then HILCORP shall backfill the excavation with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover; recontour and re-vegetate the site.

The below-grade tank area passed all requirements of Paragraph (4) of Subsection E of 19.15.17.13 NMAC and was backfilled with compacted, non-waste containing, earthen material.

8. Notice of Closure will be given prior to closure to the Aztec Division office between 72 hours and one week via email or verbally. The notification of closure will include the following:
- Operator's name
 - Location by Unit Letter, Section, Township, and Range. Well name and API number.

Notification is attached.

9. The surface owner shall be notified of HILCORP's closing of the below-grade tank 72 hours, but not more than one week, prior to closure as per the approved closure plan via certified mail, return receipt requested.

The closure process notification to the landowner was sent via email (See Attached) (Well located on Federal Land, certified mail is not required for Federal Land per BLM/OCD MOU.)

10. Re-contouring of location will match fit, shape, line, form and texture of the surrounding. Re-shaping will include drainage control, prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be place in areas where needed to prevent erosion on a large scale. Final re-contour shall have a uniform appearance with smooth surface, fitting the natural landscape.

The below-grade tank area was re-contoured to match fit, shape, line, form and texture of the surrounding area. Re-shaping including drainage control, to prevent ponding and erosion. Natural drainages were unimpeded and water bars and/or silt traps were placed in areas where needed to prevent erosion on a large scale. Final recontour has a uniform appearance with smooth surface, fitting the natural landscape.

11. HILCORP shall seed the disturbed areas the first favorable growing season following closure of a below-grade tank. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved methods. BLM stipulated seed mixes will be used on federally regulated lands and division-approved seed mixtures (administratively approved if required) will be utilized on all State or private lands. A uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre-disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds. If alternate seed mix is required by the state, private owner or tribe, it will be implemented with administrative approval if needed. Hilcorp will repeat seeding or planting will be continued until successful vegetative growth occurs.

3/23/2023

Provision 13 was accomplished through complying with BLM seeding requirements as allowed by the BLM/OCD MOU.

12. A minimum of four feet of cover shall be achieved and the cover shall include one foot of suitable material, with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.

The below-grade tank area was backfilled and more than four feet of cover was achieved and the cover included one foot of suitable material to establish vegetation at the site.

13. All closure activities will include proper documentation and be available for review upon request and will be submitted to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on C-144 and incorporate the following:
 - Soil Backfilling and Cover Installation **(See Report)**
 - Re-vegetation application rates and seeding techniques **(See Report)**
 - Photo documentation of the site reclamation **(Included as an attachment)**
 - Confirmation Sampling Results **(Included as an attachment)**
 - Proof of closure notice **(Included as an attachment)**

3/23/2023

Mandi Walker

From: Mandi Walker
Sent: Thursday, December 15, 2022 8:14 AM
To: Abiodun Adeloye; Brandon Sinclair; Burdine, Jaclyn, EMNRD; Clara Cardoza; Eufracio Trujillo; Kandis Roland; Kate Kaufman; Keri Hutchins; l1thomas@blm.gov; Mandi Walker
Subject: 72 hr BGT Closure Notice - RHODES C 102 (3004528944) (Area 6)
Attachments: 30045289440000_Rhodes C 102_BGT Permit_OCD Appvd.pdf

Follow Up Flag: Follow up
Due By: Monday, March 13, 2023 3:00 PM
Flag Status: Flagged

The subject well has a below-grade tank that will be permanently removed. The BGT Permit is attached. Please contact me at any time if you have any questions or concerns.

Well Name: RHODES C 102
API#: 30-045-28944
Location: B-31-28N-11W
Footages: 790 FNL 1950 FEL
Operator: HEC
Surface Owner: BLM
Reason for Removal: Well P&A'd
Scheduled Date & Time of Start: December 20th @ 10:30 am

****Please Note Required Photos for Closure****

Well site placard

Photos of the BGT prior to closure

The sample location or, more preferred, photos of actual sample collection

Final state of the area after closure.

Photos will require captioning including direction of photo, date and time of photo and a description of the image contents.

Mandi Walker

San Juan North/South (6,7) Regulatory Technician

Hilcorp Energy

346.237.2177

mwalker@hilcorp.com

PRE CLOSURE PHOTOS





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	

I Release Notification

Responsible Party

Responsible Party Hilcorp Energy	OGRID 372171
Contact Name: Kate Kaufman	Contact Telephone: 346-237-2275
Contact email: kkaufman@hilcorp.com	Incident # (assigned by OCD)
Contact mailing address: 1111 Travis St. Houston, TX 77471	

Location of Release Source

Latitude 36.62376 _____ Longitude -108.04226 _____
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Rhodes C #102	Site Type: Well Site
Date Release Discovered: 12/20/2022	API# (if applicable) 30-056-28944

Unit Letter	Section	Township	Range	County
B	31	28N	011W	San Juan

Surface Owner: ☐ State ☐ Federal ☒ Tribal ☐ Private (Name: _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input checked="" type="checkbox"/> Other (describe) Historic Hydrocarbon	Volume/Weight Released (provide units) Unknown	Volume/Weight Recovered (provide units)

Cause of Release

Historic contamination was discovered during BGT permit closure operations. See attached notes for additional details.


Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? N/A	

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

<input type="checkbox"/> The source of the release has been stopped. <input type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
If all the actions described above have <u>not</u> been undertaken, explain why: This is a historic release and there was no active source at the time of discovery.
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. Printed Name: <u>Kate Kaufman</u> Title: <u>Environmental Specialist</u> Signature: <u></u> Date: <u>1/20/2023</u> email: <u>kk Kaufman@hilcorp.com</u> Telephone: <u>346-237-2275</u>
<u>OCD Only</u> Received by: _____ Date: _____

Mandi Walker

From: Burdine, Jaclyn, EMNRD <Jaclyn.Burdine1@emnrd.nm.gov>
Sent: Friday, January 20, 2023 5:27 PM
To: Kate Kaufman
Cc: Mandi Walker; Kandis Roland; Eufracio Trujillo
Subject: RE: [EXTERNAL] FW: 72 hr BGT Closure Notice - RHODES C 102 (3004528944) (Area 6)

CAUTION: External sender. DO NOT open links or attachments from UNKNOWN senders.

Hi Kate, thank you for the heads up, this looks great, please proceed with the closure and then the request for the variance in the closure report.

Jackie Burdine • Environmental Specialist-Advanced – Administrative Permitting Program
EMNRD - Oil Conservation Division
1220 S. St. Francis Drive | Santa Fe, NM 87505
505.469.6769 Jaclyn.Burdine1@emnrd.nm.gov
<http://www.emnrd.nm.gov/ocd>

From: Kate Kaufman <kkaufman@hilcorp.com>
Sent: Friday, January 20, 2023 11:51 AM
To: Burdine, Jaclyn, EMNRD <Jaclyn.Burdine1@emnrd.nm.gov>
Cc: Mandi Walker <mwalker@hilcorp.com>; Kandis Roland <kroland@hilcorp.com>; Eufracio Trujillo <etrujillo@hilcorp.com>
Subject: [EXTERNAL] FW: 72 hr BGT Closure Notice - RHODES C 102 (3004528944) (Area 6)

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

Good afternoon Jaclyn,

We collected a sample for the BGT closure referenced below, and the results came back above the BGT permit closure criteria, but well below the closure criteria noted in NMAC 19.15.25 Table 1. Per the guidance you provided for this situation, I have compiled the necessary siting criteria and will request a waiver from the BGT closure standards. I would like to get your approval of this waiver before we proceed with backfill and final pit closure.

Please see attached and let me know if you have any questions or require additional information.

Thank you!
Kate

From: Mandi Walker <mwalker@hilcorp.com>
Sent: Thursday, December 15, 2022 8:14 AM
To: Abiodun Adeloye <aadeloye@blm.gov>; Brandon Sinclair <Brandon.Sinclair@hilcorp.com>; Burdine, Jaclyn, EMNRD <Jaclyn.Burdine1@emnrd.nm.gov>; Clara Cardoza <ccardoza@hilcorp.com>; Eufracio Trujillo <etrujillo@hilcorp.com>; Kandis Roland <kroland@hilcorp.com>; Kate Kaufman <kkaufman@hilcorp.com>; Keri Hutchins <khutchins@hilcorp.com>; l1thomas@blm.gov; Mandi Walker <mwalker@hilcorp.com>
Subject: 72 hr BGT Closure Notice - RHODES C 102 (3004528944) (Area 6)

The subject well has a below-grade tank that will be permanently removed. The BGT Permit is attached. Please contact me at any time if you have any questions or concerns.

Well Name: RHODES C 102
API#: 30-045-28944
Location: B-31-28N-11W
Footages: 790 FNL 1950 FEL
Operator: HEC
Surface Owner: BLM
Reason for Removal: Well P&A'd
Scheduled Date & Time of Start: December 20th @ 10:30 am

****Please Note Required Photos for Closure****

Well site placard

Photos of the BGT prior to closure

The sample location or, more preferred, photos of actual sample collection

Final state of the area after closure.

Photos will require captioning including direction of photo, date and time of photo and a description of the image contents.

Mandi Walker

San Juan North/South (6,7) Regulatory Technician

Hilcorp Energy

346.237.2177

mwalker@hilcorp.com

The information contained in this email message is confidential and may be legally privileged and is intended only for the use of the individual or entity named above. If you are not an intended recipient or if you have received this message in error, you are hereby notified that any dissemination, distribution, or copy of this email is strictly prohibited. If you have received this email in error, please immediately notify us by return email or telephone if the sender's phone number is listed above, then promptly and permanently delete this message.

While all reasonable care has been taken to avoid the transmission of viruses, it is the responsibility of the recipient to ensure that the onward transmission, opening, or use of this message and any attachments will not adversely affect its systems or data. No responsibility is accepted by the company in this regard and the recipient should carry out such virus and other checks as it considers appropriate.

Data table of soil contaminant concentrations

Sample Name	Sample Date	Field VOCs by PID (ppm)	Rhodes C #102 Laboratory Results										
			Chloride (mg/kg)	TPH as DRO (mg/kg)	TPH as GRO (mg/kg)	TPH as MRO (mg/kg)	Total TPH (mg/kg)	TPH as GRO + DRO (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Total Xylene (mg/kg)	Total BTEX (mg/kg)
19.15.29 Table 1 Closure Criteria			20,000	-	-	-	2,500	1,000	10	-	-	-	50
BGT Permit Closure Criteria			250	-	-	-	100	-	0.2	-	-	-	50
BGT Closure Sample	12/20/22	-	260	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

Analytical results show chloride levels exceeded BGT permit closure criteria but are below closure criteria noted in NMAC 19.15.29 Table 1.

Hilcorp requests a variance from the BGT permit closure standards, as adherence to current regulatory standards offers equal or better protection of water resources, public health and the environment.

Depth to groundwater determination.

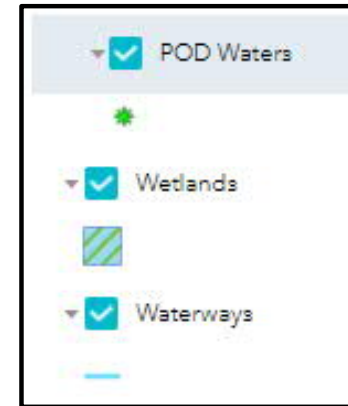
RHODES C 102

Site Specific Hydrogeology

A visual site inspection confirming the information contained herein was performed on the well 'RHODES C 102', which is located at 36.62376 degree, North latitude and 108.04226 degree, West longitude. This location is located on the Gallegos Trading Post 7.5' USGS topographic quadrangle. This location is in section 31 of Township 28 North Range 11 West of the Public Land Survey System (New Mexico Principal Meridian). This location is located in San Juan County, New Mexico. The nearest town is Bloomfield, located 6.7 miles to the northeast. The nearest large town (population greater than 10,000) is Farmington, located 11.8 miles to the northwest (National Atlas). The nearest highway is US Highway 550, located 1.4 miles to the east. The location is on Tribal land and is 488 feet from the edge of the parcel as notated in the BLM land status layer updated January 2008. This location is in the Upper San Juan, Colorado, New Mexico, Sub-basin. This location is located 1850 meters or 6068 feet above sea level and receives 10 inches of rain each year. The vegetation at this location is classified as Colorado Plateau Mixed Bedrock Canyon and Tableland as per the Southwest Regional Gap Analysis Program.

The estimated depth to ground water at this point is 496 feet. This estimation is based on the data published on the New Mexico Engineer's iWaters Database website and water depth data from ConocoPhillips' Cathodic wells. Groundwater data available from the NM State Engineer's iWaters Database for wells near the proposed site are attached. The nearest stream is 1,695 feet to the southeast and is classified by the USGS as an intermittent stream. The nearest perennial stream is 2,650 feet to the south. The nearest water body is 2,617 feet to the south. It is classified by the USGS as an intermittent lake and is 0.3 acres in size. The nearest spring is 20,524 feet to the northeast. All stream, river, water body and spring information was determined as per the USGS Hydrographic Dataset (High Resolution), downloaded 3/2008. The nearest water well is 7,703 feet to the east. There is no wetland data available for this area. The slope at this location is 5 degree, to the east as calculated from USGS 30M National Elevation Dataset. This information is also discerned from the aerial and topographic map included. The surface geology at this location is NACIMIENTO FORMATION--Shale and sandstone with a Shale dominated formations of all ages substrate. The soil at this location is 'Shiprock fine sandy loam, 0 to 2 percent slopes' and is well drained and not hydric with slight erosion potential as taken from the NRCS SSURGO map unit, downloaded January 2008. The nearest underground mine is 12.1 miles to the west as indicated on the Mines, Mills and Quarries Map of New Mexico provided.

NMAC 19.15.29 Siting Criteria for Closure Standards



BGT is not shown to be within:

- 300 ft of any continuously flowing watercourse or any other significant water course.
- 200 feet of any lakebed, sinkhole or playa lake
- 300 feet of any occupied permanent residence
- 500 feet of a spring or private, domestic fresh water well.
- 1000 feet of any fresh water well
- 300 feet of a wetland
- Incorporated municipal boundaries
- Overlying a subsurface mine
- An unstable area
- A 100-year floodplain



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

December 29, 2022

Fasho Trujillo
HILCORP ENERGY
PO Box 4700
Farmington, NM 87499
TEL: (505) 564-0733
FAX

RE: BGT Rhodes C 102

OrderNo.: 2212B96

Dear Fasho Trujillo:

Hall Environmental Analysis Laboratory received 1 sample(s) on 12/21/2022 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results, it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0901

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Freeman", is written over a horizontal line.

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Analytical Report

Lab Order 2212B96

Date Reported: 12/29/2022

Hall Environmental Analysis Laboratory, Inc.

CLIENT: HILCORP ENERGY

Client Sample ID: 5 Point Composite

Project: BGT Rhodes C 102

Collection Date: 12/20/2022 10:15:00 AM

Lab ID: 2212B96-001

Matrix: MEOH (SOIL)

Received Date: 12/21/2022 6:30:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS						Analyst: DGH
Diesel Range Organics (DRO)	ND	14		mg/Kg	1	12/22/2022 6:45:14 PM
Motor Oil Range Organics (MRO)	ND	47		mg/Kg	1	12/22/2022 6:45:14 PM
Surr: DNOP	120	21-129		%Rec	1	12/22/2022 6:45:14 PM
EPA METHOD 8015D: GASOLINE RANGE						Analyst: NSB
Gasoline Range Organics (GRO)	ND	3.2		mg/Kg	1	12/22/2022 4:50:31 AM
Surr: BFB	84.6	37.7-212		%Rec	1	12/22/2022 4:50:31 AM
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Benzene	ND	0.016		mg/Kg	1	12/22/2022 4:50:31 AM
Toluene	ND	0.032		mg/Kg	1	12/22/2022 4:50:31 AM
Ethylbenzene	ND	0.032		mg/Kg	1	12/22/2022 4:50:31 AM
Xylenes, Total	ND	0.064		mg/Kg	1	12/22/2022 4:50:31 AM
Surr: 4-Bromofluorobenzene	83.4	70-130		%Rec	1	12/22/2022 4:50:31 AM
EPA METHOD 300.0: ANIONS						Analyst: JMT
Chloride	260	60		mg/Kg	20	12/23/2022 12:46:03 AM

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	D	Sample Diluted Due to Matrix	E	Above Quantitation Range/Estimated Value
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
	PQL	Practical Quantitative Limit	RL	Reporting Limit
	S	% Recovery outside of standard limits. If undiluted results may be estimated.		

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 2212B96
29-Dec-22

Client: HILCORP ENERGY
Project: BGT Rhodes C 102

Sample ID: MB-72290		SampType: mblk		TestCode: EPA Method 300.0: Anions						
Client ID: PBS		Batch ID: 72290		RunNo: 93534						
Prep Date: 12/22/2022		Analysis Date: 12/23/2022		SeqNo: 3374330			Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID: LCS-72290		SampType: lcs		TestCode: EPA Method 300.0: Anions						
Client ID: LCSS		Batch ID: 72290		RunNo: 93534						
Prep Date: 12/22/2022		Analysis Date: 12/23/2022		SeqNo: 3374331			Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	95.6	90	110			

Qualifiers:

- *

Value exceeds Maximum Contaminant Level.
- D

Sample Diluted Due to Matrix
- H

Holding times for preparation or analysis exceeded
- ND

Not Detected at the Reporting Limit
- PQL

Practical Quantitative Limit
- S

% Recovery outside of standard limits. If undiluted results may be estimated.
- B

Analyte detected in the associated Method Blank
- E

Above Quantitation Range/Estimated Value
- J

Analyte detected below quantitation limits
- P

Sample pH Not In Range
- RL

Reporting Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 2212B96
29-Dec-22

Client: HILCORP ENERGY
Project: BGT Rhodes C 102

Sample ID: LCS-72271	SampType: LCS	TestCode: EPA Method 8015M/D: Diesel Range Organics								
Client ID: LCSS	Batch ID: 72271	RunNo: 93500								
Prep Date: 12/22/2022	Analysis Date: 12/22/2022	SeqNo: 3374252	Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	41	15	50.00	0	81.4	64.4	127			
Surr: DNOP	5.9		5.000		117	21	129			

Sample ID: MB-72271	SampType: MBLK	TestCode: EPA Method 8015M/D: Diesel Range Organics								
Client ID: PBS	Batch ID: 72271	RunNo: 93500								
Prep Date: 12/22/2022	Analysis Date: 12/22/2022	SeqNo: 3374254	Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	15								
Motor Oil Range Organics (MRO)	ND	50								
Surr: DNOP	11		10.00		111	21	129			

Qualifiers:

- *

Value exceeds Maximum Contaminant Level.
- D

Sample Diluted Due to Matrix
- H

Holding times for preparation or analysis exceeded
- ND

Not Detected at the Reporting Limit
- PQL

Practical Quantitative Limit
- S

% Recovery outside of standard limits. If undiluted results may be estimated.
- B

Analyte detected in the associated Method Blank
- E

Above Quantitation Range/Estimated Value
- J

Analyte detected below quantitation limits
- P

Sample pH Not In Range
- RL

Reporting Limit

QC SUMMARY REPORT**Hall Environmental Analysis Laboratory, Inc.**

WO#: 2212B96

29-Dec-22

Client: HILCORP ENERGY**Project:** BGT Rhodes C 102

Sample ID: mb-II	SampType: MBLK		TestCode: EPA Method 8015D: Gasoline Range							
Client ID: PBS	Batch ID: B93454		RunNo: 93454							
Prep Date:	Analysis Date: 12/21/2022		SeqNo: 3371107		Units: mg/Kg					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	880		1000		88.2	37.7	212			

Sample ID: 2.5ug gro lcs-II	SampType: LCS		TestCode: EPA Method 8015D: Gasoline Range							
Client ID: LCSS	Batch ID: B93454		RunNo: 93454							
Prep Date:	Analysis Date: 12/21/2022		SeqNo: 3371108		Units: mg/Kg					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	23	5.0	25.00	0	91.9	72.3	137			
Surr: BFB	1800		1000		182	37.7	212			

Qualifiers:

* Value exceeds Maximum Contaminant Level.
D Sample Diluted Due to Matrix
H Holding times for preparation or analysis exceeded
ND Not Detected at the Reporting Limit
PQL Practical Quantitative Limit
S % Recovery outside of standard limits. If undiluted results may be estimated.

B Analyte detected in the associated Method Blank
E Above Quantitation Range/Estimated Value
J Analyte detected below quantitation limits
P Sample pH Not In Range
RL Reporting Limit

QC SUMMARY REPORT**Hall Environmental Analysis Laboratory, Inc.**

WO#: 2212B96

29-Dec-22

Client: HILCORP ENERGY**Project:** BGT Rhodes C 102

Sample ID: mb-II	SampType: MBLK	TestCode: EPA Method 8021B: Volatiles								
Client ID: PBS	Batch ID: D93454	RunNo: 93454								
Prep Date:	Analysis Date: 12/21/2022	SeqNo: 3371171	Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.025								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	0.87		1.000		86.8	70	130			

Sample ID: 100ng btex lcs-II	SampType: LCS	TestCode: EPA Method 8021B: Volatiles								
Client ID: LCSS	Batch ID: D93454	RunNo: 93454								
Prep Date:	Analysis Date: 12/21/2022	SeqNo: 3371172	Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.91	0.025	1.000	0	90.6	80	120			
Toluene	0.94	0.050	1.000	0	93.6	80	120			
Ethylbenzene	0.93	0.050	1.000	0	92.8	80	120			
Xylenes, Total	2.8	0.10	3.000	0	92.6	80	120			
Surr: 4-Bromofluorobenzene	0.87		1.000		87.0	70	130			

Qualifiers:

* Value exceeds Maximum Contaminant Level.
D Sample Diluted Due to Matrix
H Holding times for preparation or analysis exceeded
ND Not Detected at the Reporting Limit
PQL Practical Quantitative Limit
S % Recovery outside of standard limits. If undiluted results may be estimated.

B Analyte detected in the associated Method Blank
E Above Quantitation Range/Estimated Value
J Analyte detected below quantitation limits
P Sample pH Not In Range
RL Reporting Limit



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: HILCORP ENERGY

Work Order Number: 2212B96

RcptNo: 1

Received By: Tracy Casarrubias 12/21/2022 6:30:00 AM

Completed By: Tracy Casarrubias 12/21/2022 7:04:10 AM

Reviewed By: *JMC* 12/21/22

Chain of Custody

1. Is Chain of Custody complete? Yes ☒ No ☐ Not Present ☐
2. How was the sample delivered? Courier

Log In

3. Was an attempt made to cool the samples? Yes ☒ No ☐ NA ☐
4. Were all samples received at a temperature of $>0^{\circ}\text{C}$ to 6.0°C ? Yes ☒ No ☐ NA ☐
5. Sample(s) in proper container(s)? Yes ☒ No ☐
6. Sufficient sample volume for indicated test(s)? Yes ☒ No ☐
7. Are samples (except VOA and ONG) properly preserved? Yes ☒ No ☐
8. Was preservative added to bottles? Yes ☐ No ☒ NA ☐
9. Received at least 1 vial with headspace $<1/4$ " for AQ VOA? Yes ☐ No ☐ NA ☒
10. Were any sample containers received broken? Yes ☐ No ☒
11. Does paperwork match bottle labels?
(Note discrepancies on chain of custody) Yes ☒ No ☐
12. Are matrices correctly identified on Chain of Custody? Yes ☒ No ☐
13. Is it clear what analyses were requested? Yes ☒ No ☐
14. Were all holding times able to be met?
(If no, notify customer for authorization.) Yes ☒ No ☐

of preserved
bottles checked
for pH:

(<2 or >12 unless noted)

Adjusted? _____

Checked by: *KAC 12-21-22*

Special Handling (if applicable)

15. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☒

Person Notified: _____

Date: _____

By Whom: _____

Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person

Regarding: _____

Client Instructions: _____

16. Additional remarks:

17. Cooler Information

Cooler No	Temp $^{\circ}\text{C}$	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	1.3	Good	Yes			



HALL ENVIRONMENTAL ANALYSIS LABORATORY

www.hallenvironmental.com

4901 Hawkins NE - Albuquerque, NM 87109

Tel. 505-345-3975 Fax 505-345-4107

[illegible]

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.

Released to Imaging: 3/24/2023 9:57:01 AM

CLOSURE PHOTO



District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 200175

CONDITIONS

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 200175
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By	Condition	Condition Date
jburdine	Closure report shows that release was confirmed. Variance requested as the limits stayed within the 19.15.29 and 19.15.17 NMAC table limits for remediation requirements. Variance granted. All other closure protocols were met BGT Closure report approved.	3/24/2023