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.

Proposed Alternative Method Permit or Closure Plan Application

1 Toposou Titternative Wiethou Territor of Closure Tital Tippinearion
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 avironment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.
I. OCRID#. 272171
Operator: Hilcorp Energy Company OGRID #: 372171
Address: 382 Road 3100 Aztec, NM 87410
Facility or well name: SAN JUAN 28-7 UNIT 259 BGT #2
API Number: OCD Permit Number:
U/L or Qtr/Qtr L Section 24 Township 28N Range 7W County: Rio Arriba
Center of Proposed Design: Latitude 36.643749 Longitude -107.531395 NAD83
Surface Owner: ☐ Federal ☐ 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 ☐ HDPE ☐ PVC ☐ Other ☐ String-Reinforced Liner Seams: ☐ Welded ☐ Factory ☐ Other Volume:bbl Dimensions: Lx Wx D
Below-grade tank: Subsection I of 19.15.17.11 NMAC
Volume:bbl Type of fluid:Produced Water
Tank Construction material: Metal 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: Thickness45mil
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.
s. 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)
☐ 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,

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.	
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 acceptance are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	otable source
General siting	
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank. - 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 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	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.	☐ Yes ☐ No
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No

 Within 100 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site 	☐ Yes ☐ No
Temporary Pit Non-low chloride drilling fluid	
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Permanent Pit or Multi-Well Fluid Management Pit	
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa	
lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.	
- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	Yes No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.97. Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the do attached. 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. Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19 and 19.15.17.13 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number:	9 NMAC 1.15.17.9 NMAC
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 do attached. Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC A List of wells with approved application for permit to drill associated with the pit. Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19 and 19.15.17.13 NMAC Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC	
Previously Approved Design (attach copy of design) API Number: or Permit Number:	

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the 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 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	documents are
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 Files.	luid 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	
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	attached to the
15. <u>Siting Criteria (regarding on-site closure methods only)</u> : 19.15.17.10 NMAC <u>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.</u>	
Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	Yes No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	

adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Wr	ritten approval obtained from the	municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine Written confirmation or verification or map from the NM EMN	NRD-Mining and Mineral Division	on	☐ Yes ☐ No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau Society; Topographic map	u of Geology & Mineral Resour	ces; USGS; NM Geological	
Within a 100-year floodplain.			Yes No
- FEMA map			☐ Yes ☐ No
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: by a check mark in the box, that the documents are attached. Siting Criteria Compliance Demonstrations - based upon the app Proof of Surface Owner Notice - based upon the appropriate requ Construction/Design Plan of Burial Trench (if applicable) based Construction/Design Plan of Temporary Pit (for in-place burial of Protocols and Procedures - based upon the appropriate requiremed Confirmation Sampling Plan (if applicable) - based upon the appropriate requiremed Disposal Facility Name and Permit Number (for liquids, drilling Soil Cover Design - based upon the appropriate requirements of Re-vegetation Plan - based upon the appropriate requirements of Site Reclamation Plan - based upon the appropriate requirements	propriate requirements of 19.15.1 uirements of Subsection E of 19.1 upon the appropriate requirements of a drying pad) - based upon the ents of 19.15.17.13 NMAC propriate requirements of 19.15.1 uirements of 19.15.17.13 NMAC gluids and drill cuttings or in cast Subsection H of 19.15.17.13 NM f Subsection H of 19.15.17.13 NM	7.10 NMAC .15.17.13 NMAC .nts of Subsection K of 19.15.17 .appropriate requirements of 19 .7.13 NMAC .se on-site closure standards cannual MAC MAC	.11 NMAC .15.17.11 NMAC
17. Operator Application Certification:			
I hereby certify that the information submitted with this application is	-	-	
Name (Print):	Title:		
Signature:	Date:		
e-mail address:	Telephone:		
18. OCD Approval: ☐ Permit Application (including closure plan) 🗓	Closure Mad (bhl/h) OCD	Conditions (see attachment)	
OCD Representative Signature: Victoria Venegas	· · · · · · · · · · · · · · · · · · ·	Approval Date:01/1	0/2024
Title: Environmental Specialist	OCD Permit Numl	ber: BGT1	
19. Closure Report (required within 60 days of closure completion): 19. Instructions: Operators are required to obtain an approved closure p The closure report is required to be submitted to the division within 6 section of the form until an approved closure plan has been obtained	plan prior to implementing any of the following the completion of the land the closure activities have be	closure activities. Please do no	
20. Closure Method: Waste Excavation and Removal ☐ On-Site Closure Method ☐ If different from approved plan, please explain.	☐ Alternative Closure Method	☐ Waste Removal (Closed-l	oop systems only)
21. Closure Report Attachment Checklist: Instructions: Each of the formark 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		to the closure report. Please in	ndicate, by a check
☐ Plot Plan (for on-site closures and temporary pits) ☐ Confirmation Sampling Analytical Results (if applicable) ☐ Waste Material Sampling Analytical Results (required for on-site ☐ 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		NAD: □192	7 □ 1092

22.			
Operator Closu	re Certification:		
I hereby certify t	hat the information and attachments submitted with this closure	report is	true, accurate and complete to the best of my knowledge and
	tify that the closure complies with all applicable closure require		
Name (Print):	Tammy Jones	Title:	Operations/Regulatory Technician – Sr
	Tammy lance		
Signature:	Tammy Jones		Date: 1/8/2024
	toionog@hil		(505) 224 5195
e-mail address:_	tajones@hilcorp.com Teleph	one:	(505) 324-5185

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

Lease Name: San Juan 28-7 Unit 259

API No.: 30-039-21690

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.

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

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

Revised 10/14/2015

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

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

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

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

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

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

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

A release was not determined for the above referenced well.

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

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

Revised 10/14/2015

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

Reclamation of the BGT shall be considered complete when:

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

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

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

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

Closure Report:

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

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

Tammy Jones

From: Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>

Sent: Tuesday, October 24, 2023 8:58 AM

To: Tammy Jones; Abiodun Adeloye; Brandon Sinclair; Clara Cardoza; Eufracio Trujillo; Chad Perkins;

Dale Crawford; Kate Kaufman; Ben Mitchell; Ramon Hancock; Lisa Jones; Venegas, Victoria,

EMNRD; Ryan Frost; Matthew Esz; Farmington Regulatory Techs

Subject: RE: [EXTERNAL] 72 hour BGT Closure Notice - SAN JUAN 28-7 UNIT 259 (API# 30-039-21690)

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

Hi Tammy,

Your notice has been received and updated in e-permitting.

Thank you,

Shelly

Shelly Wells * Environmental Specialist-Advanced Environmental Bureau EMNRD-Oil Conservation Division 1220 S. St. Francis Drive | Santa Fe, NM 87505 (505)469-7520 | Shelly. Wells@emnrd.nm.gov http://www.emnrd.state.nm.us/OCD/

From: Tammy Jones <tajones@hilcorp.com> Sent: Tuesday, October 24, 2023 8:52 AM

To: Abiodun Adeloye <aadeloye@blm.gov>; Brandon Sinclair <Brandon.Sinclair@hilcorp.com>; Clara Cardoza <ccardoza@hilcorp.com>; Eufracio Trujillo <etrujillo@hilcorp.com>; Chad Perkins <cperkins@hilcorp.com>; Dale Crawford <dcrawford@hilcorp.com>; Kate Kaufman <kkaufman@hilcorp.com>; Ben Mitchell <bemitchell@hilcorp.com>; Ramon Hancock <Ramon.Hancock@hilcorp.com>; Lisa Jones ljones@hilcorp.com>; Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>; Venegas, Victoria, EMNRD <Victoria.Venegas@emnrd.nm.gov>; Ryan Frost <rfrost@hilcorp.com>; Matthew Esz <mathematical Matthew.Esz@hilcorp.com>; Farmington Regulatory Techs <FarmingtonRegulatoryTechs@hilcorp.com>
Subject: [EXTERNAL] 72 hour BGT Closure Notice - SAN JUAN 28-7 UNIT 259 (API# 30-039-21690)

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

Subject: 72 Hour BGT Closure Notification

Anticipated Start Date: Friday, 10/27/2023 at 10:30 AM MST

The subject well has a below-grade tank that will be permanently removed. The (BGT 2) permit is attached. Please contact me if you have any questions or concerns.

Well Name: SAN JUAN 28-7 UNIT 259

API#: 30-039-21690

Location: Unit L (NWSW), Section 24, T28N, R7W

Footages: 1450' FSL & 790' FWL

Operator: Hilcorp Energy Surface Owner: FEDERAL

Reason: Equipment Removal.

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.

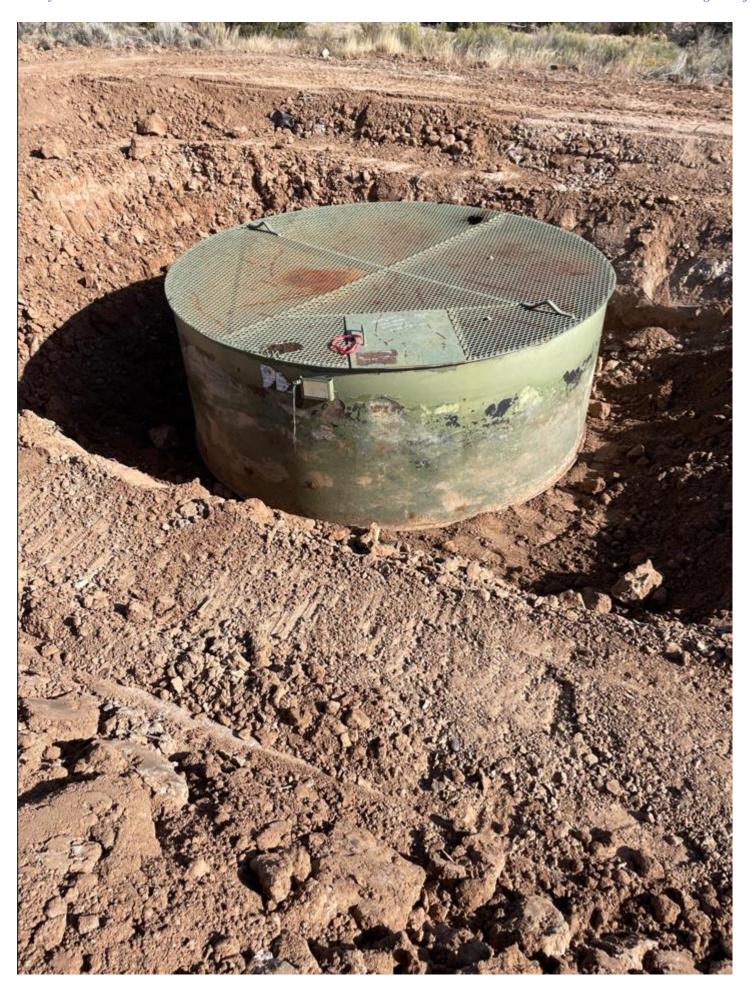
Thanks,

Tammy Jones | HILCORP ENERGY COMPANY | San Juan Regulatory | 505.324.5185 | tajones@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.









SAN JUAN 28.7 259 BGT CLOSURE SAMPLING 10-27-2023 PICS TAKEN FROM THIS SIDE PIC#1 - 10:11 AM FACING WEST PIC*2 - 10:34AM FAGNE NORTH PIC#3 - 10:39 AM FACING NORTH PIC+4 - 10:42 AM FACING NORTH

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

Responsible		lcorp Energy Comp	pany	OGRID	372171
	Contact Name Tammy Jones Contact T			Contact Te	Telephone: (505) 324-5185
Contact emai	il tajone	s@hilcorp.com		Incident #	# (assigned by OCD)
Contact mail:	ing address	382 Road 3100	Aztec NM 8741	0	
			Location	of Release So	Source
Latitude	36.64374	.9	(NAD 83 in dec	Longitude _ imal degrees to 5 decin	-107.531395 imal places)
Site Name Sa	an Juan 28-7	7 Unit 259 BGT#2	2	Site Type	Gas Well
Date Release	Discovered	N/A		API# (if app	oplicable) 30-039-21690
Unit Letter	Section	Township	Range	Cour	inty
L	24	28N	7W	Rio Aı	•
Surface Owner	r: State	⊠ Federal □ Tr	ibal	lame:)
			Nature and	Volume of 1	Release
_				calculations or specific	c justification for the volumes provided below)
Crude Oil		Volume Release	d (bbls)		Volume Recovered (bbls)
Produced	Water	Volume Release	d (bbls)		Volume Recovered (bbls)
		Is the concentrat produced water >	ion of dissolved ch >10,000 mg/l?	nloride in the	☐ Yes ☐ No
Condensa	te	Volume Release	d (bbls)		Volume Recovered (bbls)
Natural Gas Volume Released (Mcf)			Volume Recovered (Mcf)		
Other (describe) Volume/Weight Released (provide units) Volume/Weight Recovered (provide units)					
Cause of Rele	ease	<u> </u>			
No release wa	s encountere	ed during the BGT (Closure.		

Received by OCD: 1/9/2024 11:23:57 AM Form C-141 State of New Mexico Page

Page	18	of	29
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om e i ii	State of frew Mexico	Incident ID	
Page 2	Oil Conservation Division	District RP	
		Facility ID	
		Application ID	
Was this a major	If YES, for what reason(s) does the responsible par	ty consider this a major release?	
release as defined by			

release as defined by 19.15.29.7(A) NMAC?	,	1 1 7	J
☐ Yes ⊠ No	N/A		
	1771		
If YES, was immediate no	otice given to the OCD? By who	om? To whom? When and b	by what means (phone, email, etc)?
Not Required			
	Ir	nitial Response	
The responsible	party must undertake the following action	ns immediately unless they could cre	eate 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	health and the environment.	
Released materials ha	we been contained via the use of	berms or dikes, absorbent pa	ads, or other containment devices.
All free liquids and re	ecoverable materials have been re	emoved and managed approp	oriately.
If all the actions described	d above have <u>not</u> been undertaken	n, explain why:	
has begun, please attach	a narrative of actions to date. If	f remedial efforts have been	diately after discovery of a release. If remediation successfully completed or if the release occurred formation needed for closure evaluation.
regulations all operators are public health or the environr failed to adequately investig	required to report and/or file certain ment. The acceptance of a C-141 rep ate and remediate contamination that	release notifications and perform out by the OCD does not relieve t pose a threat to groundwater, s	ge and understand that pursuant to OCD rules and m corrective actions for releases which may endanger e the operator of liability should their operations have surface water, human health or the environment. In ompliance with any other federal, state, or local laws
Printed Name:	Tammy Jones	Title:	Operations/Regulatory Technician – Sr.
Signature: Tammy	y Jones	Date: <u>1/8/2024</u>	
email:	tajones@hilcorp.com	Telephone:	(505) 324-5185
OCD Only			
Received by:		Date:	



Eurofins Environment Testing South Central, LLC 4901 Hawkins NE Albuquerque, NM 87109 TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

November 09, 2023

Fasho Trujillo
HILCORP ENERGY
PO Box 4700
Farmington, NM 87499

TEL: (505) 564-0733

FAX:

RE: San Juan 28 7 Unit 259 BGT Closure OrderNo.: 2310D48

Dear Fasho Trujillo:

Eurofins Environment Testing South Central, LLC received 1 sample(s) on 10/28/2023 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 do not hesitate to contact Eurofins Albuquerque for any additional information or clarifications.

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

Sincerely,

Andy Freeman

Laboratory Manager

andy

4901 Hawkins NE

Albuquerque, NM 87109

Analytical ReportLab Order **2310D48**

Date Reported: 11/9/2023

Hall Environmental Analysis Laboratory, Inc.

CLIENT: HILCORP ENERGY Client Sample ID: BGT 5 Point

 Project:
 San Juan 28 7 Unit 259 BGT Closure
 Collection Date: 10/27/2023 10:35:00 AM

 Lab ID:
 2310D48-001
 Matrix: SOIL
 Received Date: 10/28/2023 7:50:00 AM

Analyses	Result	RL Qu	al Units	DF	Date Analyzed
EPA METHOD 8015M/D: DIESEL RANGE OR	RGANICS				Analyst: PRD
Diesel Range Organics (DRO)	ND	9.7	mg/Kg	1	11/1/2023 11:42:00 PM
Motor Oil Range Organics (MRO)	ND	49	mg/Kg	1	11/1/2023 11:42:00 PM
Surr: DNOP	132	69-147	%Rec	1	11/1/2023 11:42:00 PM
EPA METHOD 8015D: GASOLINE RANGE					Analyst: JJP
Gasoline Range Organics (GRO)	ND	5.0	mg/Kg	1	11/3/2023 2:48:20 AM
Surr: BFB	94.5	15-244	%Rec	1	11/3/2023 2:48:20 AM
EPA METHOD 8021B: VOLATILES					Analyst: JJP
Benzene	ND	0.025	mg/Kg	1	11/3/2023 2:48:20 AM
Toluene	ND	0.050	mg/Kg	1	11/3/2023 2:48:20 AM
Ethylbenzene	ND	0.050	mg/Kg	1	11/3/2023 2:48:20 AM
Xylenes, Total	ND	0.099	mg/Kg	1	11/3/2023 2:48:20 AM
Surr: 4-Bromofluorobenzene	94.2	39.1-146	%Rec	1	11/3/2023 2:48:20 AM
EPA METHOD 300.0: ANIONS					Analyst: KCB
Chloride	ND	60	mg/Kg	20	11/1/2023 10:15:25 PM

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

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 Quanitative 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

Page 1 of 5

Hall Environmental Analysis Laboratory, Inc.

2310D48 09-Nov-23

WO#:

Client: HILCORP ENERGY

Project: San Juan 28 7 Unit 259 BGT Closure

Sample ID: MB-78503 SampType: mblk TestCode: EPA Method 300.0: Anions

Client ID: PBS Batch ID: 78503 RunNo: 100902

Prep Date: 11/1/2023 Analysis Date: 11/1/2023 SeqNo: 3702714 Units: mg/Kg

Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual

Chloride ND 1.5

Sample ID: LCS-78503 SampType: Ics TestCode: EPA Method 300.0: Anions

Client ID: **LCSS** Batch ID: **78503** RunNo: **100902**

Prep Date: 11/1/2023 Analysis Date: 11/1/2023 SeqNo: 3702715 Units: mg/Kg

Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual

Chloride 14 1.5 15.00 0 90.7 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 Quanitative 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

Page 2 of 5

Hall Environmental Analysis Laboratory, Inc.

2310D48 09-Nov-23

WO#:

Client: HILCORP ENERGY

Project: San Juan 28 7 Unit 259 BGT Closure

Sample ID: LCS-78476	SampT	ype: LC	S	Tes	tCode: EF	PA Method	8015M/D: Die	sel Range	Organics	
Client ID: LCSS	Batch	1D: 78 4	176	F	RunNo: 10	00868				
Prep Date: 10/31/2023	Analysis D	ate: 11	/1/2023	9	SeqNo: 37	701935	Units: mg/K	g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	48	10	50.00	0	96.8	61.9	130			
Surr: DNOP	6.0		5.000		120	69	147			

Sample ID: MB-78476	SampT	уре: МЕ	BLK	Tes	tCode: EF	PA Method	8015M/D: Die	sel Range	Organics	
Client ID: PBS	Batch	n ID: 78 4	176	F	RunNo: 10	00868				
Prep Date: 10/31/2023	Analysis D)ate: 11	/1/2023	5	SeqNo: 37	701938	Units: mg/K	g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Motor Oil Range Organics (MRO)	ND	50								
Surr: DNOP	12		10.00		119	69	147			

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- Н Holding times for preparation or analysis exceeded
- Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- % Recovery outside of standard limits. If undiluted results may be estimated.
- Analyte detected in the associated Method Blank
- Above Quantitation Range/Estimated Value
- Analyte detected below quantitation limits
- Sample pH Not In Range
- Reporting Limit

Page 3 of 5

Hall Environmental Analysis Laboratory, Inc.

2310D48

WO#:

09-Nov-23

Client: HILCORP ENERGY

Project: San Juan 28 7 Unit 259 BGT Closure

Sample ID: Ics-78470	SampT	ype: LC :	S	Tes	tCode: EF	PA Method	8015D: Gaso	line Range	!	
Client ID: LCSS	Batch	n ID: 784	170	F	RunNo: 10	00917				
Prep Date: 10/31/2023	Analysis D	Date: 11	/2/2023	5	SeqNo: 37	703685	Units: mg/K	g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	22	5.0	25.00	0	88.6	70	130			
Surr: BFB	1900		1000		195	15	244			

Sample ID: mb-78470	Sampl	ype: ME	BLK	I es	tCode: E	PA Method	8015D: Gasoli	ine Range		
Client ID: PBS	Batch	1D: 78 4	470	F	RunNo: 1	00917				
Prep Date: 10/31/2023	Analysis D	ate: 11	/2/2023	9	SeqNo: 3	703686	Units: mg/Kg	g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								

Surr: BFB

920

1000

91.8

15

244

Qualifiers: Value exceeds Maximum Contaminant Level.

D Sample Diluted Due to Matrix

Н Holding times for preparation or analysis exceeded

Not Detected at the Reporting Limit

PQL Practical Quanitative Limit

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

Analyte detected in the associated Method Blank

Above Quantitation Range/Estimated Value

Analyte detected below quantitation limits

Sample pH Not In Range

Reporting Limit

Page 4 of 5

Hall Environmental Analysis Laboratory, Inc.

2310D48 09-Nov-23

WO#:

Client: HILCORP ENERGY

Project: San Juan 28 7 Unit 259 BGT Closure

Sample ID: LCS-78470	Samp	Гуре: LC	s	Tes	tCode: EF	PA Method	8021B: Volati	les		
Client ID: LCSS	Batcl	h ID: 78 4	170	F	RunNo: 10	00917				
Prep Date: 10/31/2023	Analysis [Date: 11	/2/2023	5	SeqNo: 37	703716	Units: mg/K	g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.84	0.025	1.000	0	83.7	70	130			
Toluene	0.88	0.050	1.000	0	87.8	70	130			
Ethylbenzene	0.89	0.050	1.000	0	88.7	70	130			
Xylenes, Total	2.7	0.10	3.000	0	89.6	70	130			
Surr: 4-Bromofluorobenzene	1.0		1.000		100	39.1	146			

Sample ID: mb-78470	Samp ¹	Гуре: МЕ	BLK	Tes	tCode: El	PA Method	8021B: Volati	iles		
Client ID: PBS	Batc	h ID: 78 4	470	F	RunNo: 10	00917				
Prep Date: 10/31/2023	Analysis [Date: 11	/2/2023	(SeqNo: 3	703717	Units: mg/K	(g		
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	0.97		1.000		97.3	39.1	146			

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 Quanitative Limit
- 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

Page 5 of 5

Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87109

TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

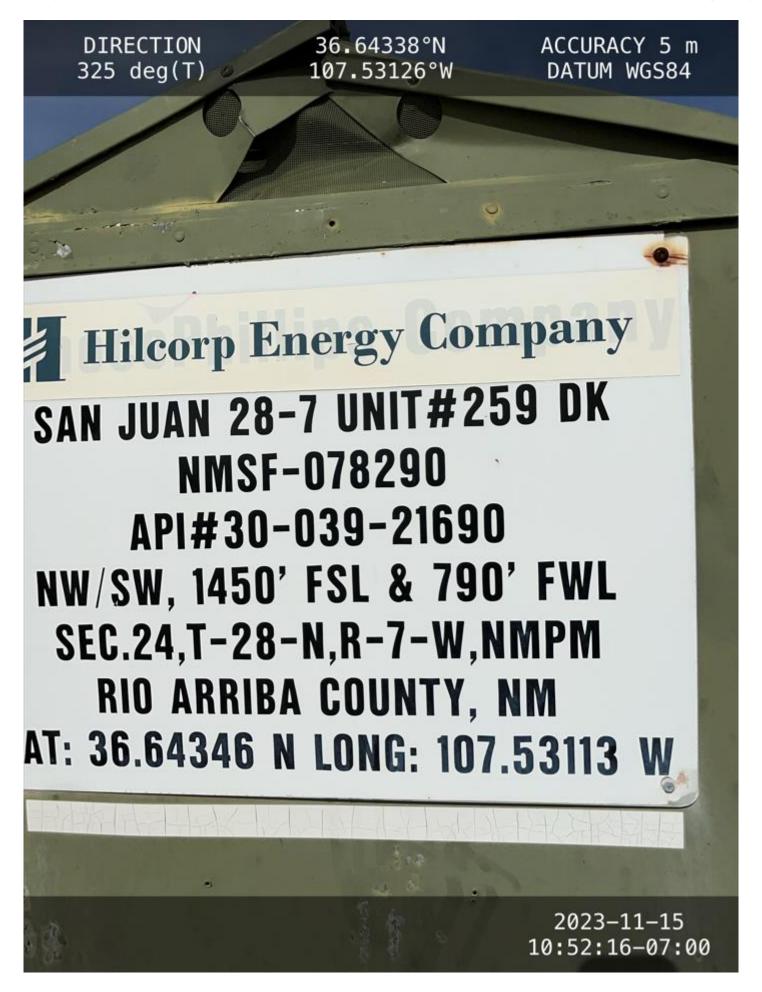
Sample Log-In Check List

Released to Imaging: 1/11/2024 9:19:11 AM

Client Name: HILCORP ENERGY Wor	k Order Number: 2310D48	i e	RcptNo: 1
Received By: Cheyenne Cason 10/28/	2023 7:50:00 AM	Chenl	
Completed By: Cheyenne Cason 10/28/	2023 9:20:28 AM	Chenl	
Reviewed By: 7~10/30/23			
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 🗆
A 1M/222 211 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	24. C 200 V	No 🗌	na 🗀
 Were all samples received at a temperature of >0° (C to 6.0°C Yes ✓	NO 🗀	NA L
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 preser	ved? Yes 🗹	No 🗌	
8. Was preservative added to bottles?	Yes 🗌	No 🗹	NA 🗌
9. Received at least 1 vial with headspace <1/4" for AQ		No 🗌	NA 🗹
(). Were any sample containers received broken?	Yes U	No 🗹	# of preserved bottles checked
1. Does paperwork match bottle labels? (Note discrepancies on chain of custody)	Yes 🗸	No 🗌	for pH: (<2 or >12 unless noted)
Are matrices correctly identified on Chain of Custody	? Yes ✓	No 🗌	Adjusted?
3. Is it clear what analyses were requested?	Yes 🗹	No 🗌	1
4. Were all holding times able to be met? (If no, notify customer for authorization.)	Yes 🗸	No 🗌	Checked by: WC 101
Special Handling (if applicable)			
15. Was client notified of all discrepancies with this order	er? 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 °C Condition Seal Intact 1 4.9 Good Yes	t Seal No Seal Date Yogi	Signed By	
1 4.9 Good Yes	LUUI		

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			Cooler Temp(including cF): 4	9-0	r 4.9		oijse										
Date Time	Matrix	rix Sample Name	Container Type and #	Preservative 23/	HEAL No.	BTEX /	9 r808	EDB (M	RCRA 8	(c) E' B	V) 0828 2) 0728	Total Co					
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District III

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

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 301596

CONDITIONS

Operator:	OGRID:
HILCORP ENERGY COMPANY	372171
1111 Travis Street	Action Number:
Houston, TX 77002	301596
	Action Type:
	[C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created		Condition Date
vveneg	s None	1/11/2024