

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
☒ 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

Legacy BGT1

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: NAVAJO 26 1
API Number: 30-045-30099 OCD Permit Number: Legacy BGT 1
U/L or Qtr/Qtr L Section 26 Township 29N Range 14W County: San Juan
Center of Proposed Design: Latitude 36.693799 Longitude -108.284011 NAD83
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.

Variations 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
☒ 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.

- 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: Jeffrey S Harrison Approval Date: 11/13/2024

Title: Environmental Scientist A OCD Permit Number: Legacy 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: 6/25/2024

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): Priscilla Shorty Title: Operations/Regulatory Technician – Sr

Signature: Priscilla Shorty Date: 11/5/2024

e-mail address: pshorty@hilcorp.com Telephone: (505) 324-5188

Hilcorp Energy Company
BGT Modification

Hilcorp Energy Company is requesting to modify the below-grade tank permit for Navajo 26 1 (30.045.30099) as follows:

- Hilcorp Energy would like to base the BGT permit/registration on the current 19.15.17 NMAC rule. The closure plan includes an updated confirmation sampling limits, Table I attached.
- Hilcorp Energy requests approval to use the 8015D method and add together DRO, MRO and GRP for TPH result.

Table I Closure Criteria for Soils Beneath Below-Grade Tanks, Drying Pads Associated with Closed-Loop Systems and Pits where Contents are Removed			
Depth below bottom of pit to groundwater less than 10,000 mg/l TDS	Constituent	Method*	Limit**
≤50 feet	Chloride	EPA 300.0	600 mg/kg
	TPH	EPA SW-846 Method 418.1	100 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg
51 feet-100 feet	Chloride	EPA 300.0	10,000 mg/kg
	TPH	EPA SW-846 Method 418.1	2,500 mg/kg
	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg
> 100 feet	Chloride	EPA 300.0	20,000 mg/kg
	TPH	EPA SW-846 Method 418.1	2,500 mg/kg
	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg

*Or other test methods approved by the division

**Numerical limits or natural background level, whichever is greater

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

Lease Name: NAVAJO 26 1
API No.: 30-045-30099

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).

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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.

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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)**

Revised 10/14/2015

Priscilla Shorty

From: Priscilla Shorty
Sent: Wednesday, June 19, 2024 6:50 AM
To: Chad Perkins; Dale Crawford; Mitch Killough; Brandon Sinclair; Ben Mitchell; Ramon Hancock; Lisa Jones; Abiodun Adeloye; bertha.spencer@bia.gov; laverna.jaquez@bia.gov; Victoria Venegas (Victoria.Venegas@emnrd.nm.gov); Farmington Regulatory Techs; Samantha Grabert; Kate Kaufman; Alex Rios; Christopher Bramwell; Priscilla Shorty; Ray Shelby; Tammy Jones
Subject: 72 Hour BGT Closure Notification – NAVAJO 26 1 (30.045.30099)
Attachments: 30045300990000_NAVAJO 26 1_BGT PERMIT_OCD APPVD.pdf

Subject: 72 Hour BGT Closure Notification

Anticipated Start Date: **Tuesday, June 25, 2024 at 1:00 PM**

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

Well Name: NAVAJO 26 1

API#: 30-045-30099

Location: Unit L (NW/SW), Section 26, T29N, R14W

Footages: 1415' FSL & 1150' FWL

Operator: Hilcorp Energy **Surface Owner:** TRIBAL

Reason: Well was P&A'd

****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,

Priscilla Shorty

Operations Regulatory Technician

Hilcorp Energy Company

505-324-5188

pshorty@hilcorp.com



DIRECTION
263 deg(T)

36.69395°N
108.28388°W

ACCURACY 5 m
DATUM WGS84



Navajo 26 #001

Before Removal

2024-06-25

12:11:43-06:00

DIRECTION
291 deg(T)

36.69387°N
108.28386°W

ACCURACY 4 m
DATUM WGS84



Navajo 26 #001

Tank Bottom

2024-06-25
12:15:09-06:00

DIRECTION
308 deg(T)

36.69391°N
108.28392°W

ACCURACY 4 m
DATUM WGS84



Navajo 26 #001

After Removal
with Composite
Sample Points

2024-06-25
12:21:27-06:00

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 Party Hilcorp Energy Company	OGRID 372171
Contact Name Mitch Killough	Contact Telephone 713-757-5247
Contact email mkillough@hilcorp.com	Incident #
Contact mailing address 1111 Travis Street, Houston, Texas 77002	

Location of Release Source

Latitude 36.693987 Longitude -108.283391
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Navajo 26 1	Site Type Well
Date Release Discovered: N/A	API# 30-045-30099

Unit Letter	Section	Township	Range	County
L	26	29N	14W	San Juan

Surface Owner: ☐ State ☐ Federal ☒ Tribal ☐ Private

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 type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)


Cause of Release:
Per the email guidance attached (dated 8/16/2024), NMOCD has confirmed that no release needs to be reported. Hilcorp determined that chlorides exceeded the BGT closure criteria thresholds shown in Condition 7 of the closure plan. Thus, indicating that a potential release occurred. However, chlorides did not exceed the Closure Criteria for Soils Beneath Below-Grade Tanks listed in current Table I of 19.15.17.13 NMAC for groundwater depths (>100 ft). In light of this, Hilcorp respectfully requests 1) a modification to the current BGT permit/registration allowing Hilcorp to compare the laboratory analytical to the current 19.15.17 NMAC rule and 2) approval to use EPA Method 8015D for TPH analysis. Hilcorp has also attached the Exception/Variance Request (dated 8/15/2024).

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? N/A
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped.	
<input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment.	
<input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.	
<input checked="" 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: Not Required	
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>Mitch Killough</u> Title: <u>Environmental Specialist</u>	
Signature: <u></u> Date: <u>09/16/2024</u>	
email: <u>mkillough@hilcorp.com</u> Telephone: <u>713-757-5247</u>	
<u>OCD Only</u>	
Received by: _____ Date: _____	

Mitch Killough

From: Kennedy, Joseph, EMNRD <Joseph.Kennedy@emnrd.nm.gov>
Sent: Friday, August 16, 2024 11:55 AM
To: Mitch Killough
Subject: [EXTERNAL] Hilcorp - Legacy BGT Closures - 19.15.17.13 NMAC Guidance API: 30-045-30099 Navajo 26-1
Attachments: C-141 Filing (exception_variance request) - Navajo 26 1- 08152024.pdf

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

Dear Mr. Killough,

OCD has reviewed the email dated 8/15/2024, submitted to my supervisor, Leigh Barr, from Hilcorp Energy Company (HEC) and found that the 5 point composite sample taken below the BGT associated with API: 30-045-30099 Navajo 26-1 has results for chloride of 1,700 mg/kg, which exceeds the limit of the permit/registration of 12/10/08. This BGT was permitted/registered under the older 19.15.17 NMAC rule which states a maximum chloride limit of 250 mg/kg or background, whichever is greater. These limits were also included in the approved closure plan.

OCD has also found that the depth to groundwater determination in the aforementioned permit/registration, approved by the OCD, is greater than 100' feet. The OCD understands that the current 19.15.17 NMAC rule has a less stringent chloride limit, and that HEC did not exceed the chloride limit in the current rule, based on this depth to groundwater. Therefore, HEC can request a modification to their existing permit/registration **utilizing the C-144 Form**. The modification request should state that HEC wants their BGT permit/registration to be based on the current 19.15.17 NMAC rule. HEC also needs to include an update to the closure plan's confirmation sampling limits. No release needs to be reported.

Please note that even though HEC's sampling resulted non-detects for DRO, MRO and GRO, Table 1 of 19.15.17.13 NMAC specifies that TPH be analyzed using EPA SW-846 Method 418.1. The lab report HEC submitted to OCD on 8/15/2024 shows the analysis for TPH used method 8015D for DRO, GRO and MRO. HEC should request approval to use these methods and add together DRO, MRO and GRO for TPH result, and include this in your modification request.

For simplicity, HEC can combine theses modification requests in conjunction with the final closure report.

The OCD is granting approval for HEC to backfill the area and then to proceed with revegetation. Once closure is completed, HEC must submit a final closure report that addresses all components in the approved closure plan (e.g., waste disposal methods/disposal site name,

proof surface owner was notified, etc.). HEC must submit the final closure report, utilizing the C-144 Form, to the OCD within 60-days of closure completion. In this C-144 application, HEC also needs to ask for the modification request and check the Type of action “Modification to an existing permit/or registration” in conjunction with the “Closure of a pit, below-grade tank, or proposed alternative method.” All applicable sections for the closure report need to be filled out and section 16 needs to be checked for “Confirmational Sampling Plan.” HEC needs to include the updated closure plan’s confirmation sampling limits.

Please do not hesitate to contact me if you have any questions.

Respectfully,

Joe Kennedy • Environmental Scientist Specialist - Advanced
Environmental Bureau
EMNRD - Oil Conservation Division
1220 S. Saint Francis Drive | Santa Fe, New Mexico 87505
(505) 549-5583 | joseph.kennedy@emnrd.nm.gov
www.emnrd.nm.gov

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 Party Hilcorp Energy Company	OGRID 372171
Contact Name Mitch Killough	Contact Telephone 713-757-5247
Contact email mkillough@hilcorp.com	Incident #
Contact mailing address 1111 Travis Street, Houston, Texas 77002	

Location of Release Source

Latitude 36.693987 Longitude -108.283391
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Navajo 26 1	Site Type Well
Date Release Discovered: 7/10/2024 @ 04:21 pm (MT) – Date/Time Eurofins laboratory report received	API# 30-045-30099

Unit Letter	Section	Township	Range	County
L	26	29N	14W	San Juan

Surface Owner: ☐ State ☐ Federal ☒ Tribal ☐ Private

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 checked="" type="checkbox"/> Produced Water	Volume Released (bbls) Unknown	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 type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release:

Historical release discovered during the permanent removal of a below-grade tank (BGT). Refer to attached memo (dated 8/15/2024) for additional information.

Per the memo attached, Hilcorp determined that chlorides exceeded the BGT closure criteria thresholds shown in Condition 7 of the closure plan. Thus, indicating that a potential release occurred. However, chlorides did not exceed the Closure Criteria for Soils Beneath Below-Grade Tanks listed in Table I of 19.15.17.13 NMAC for groundwater depths (>100 ft).


State of New Mexico
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)?	

Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped.	
<input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment.	
<input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.	
<input checked="" 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:	
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>Mitch Killough</u>	Title: <u>Environmental Specialist</u>
Signature: 	Date: <u>08/15/2024</u>
email: <u>mkillough@hilcorp.com</u>	Telephone: <u>713-757-5247</u>
<u>OCD Only</u>	
Received by: _____	Date: _____



Memorandum

To: Energy, Minerals, and Natural Resources Department (EMNRD) – Permitting Program

From: Mitch Killough, Hilcorp Energy Company (Hilcorp)

Date: 8/15/2024

Subject: Navajo 26 1 – Permanent Closure of a Below-Grade Tank (BGT) – Exception/Variance Request

On 6/19/2024, Hilcorp submitted a 72-hour notice prior to the permanent closure of a BGT at the Navajo 26 1, San Juan County, New Mexico. As required by Condition 7 (*found in the enclosed Closure Plan, received by the NMOCD on 12/12/2008*), Hilcorp personnel proceeded to collect a 5-pt composite soil sample on 6/25/2024 to determine if any contaminant concentrations exceeded the BGT closure criteria thresholds, per Condition 7. Upon receiving analytical results on 7/10/2024, Hilcorp determined that chlorides exceeded the BGT closure criteria thresholds shown in Condition 7 of the closure plan. Thus, indicating that a potential release occurred (refer to table below). However, chlorides did not exceed the Closure Criteria for Soils Beneath Below-Grade Tanks listed in Table I of 19.15.17.13 NMAC for groundwater depths (>100 ft bgs).

Soil Sample Identification	Sample Date	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Total Xylenes (mg/kg)	Total BTEX (mg/kg)	Chlorides (mg/kg)	GRO (mg/kg)	DRO (mg/kg)	MRO (mg/kg)	GRO+DRO (mg/kg)	TPH (mg/kg)
Bottom Comp	6/25/2024	<0.024	<0.049	<0.049	<0.098	<0.220	1700	<4.9	<9.7	<49	<14.6	<63.6
NMOCD BGT Closure Criteria		0.2	NE	NE	NE	50	250	NE	NE	NE	NE	100
Table I of 19.15.17.13 NMAC		10	NE	NE	NE	50	10,000	NE	NE	NE	1,000	2,500

In accordance with 19.15.17.13(C)(3)(c) NMAC, all contaminant concentrations are less than the parameters listed in Table I of 19.15.17.13 NMAC for groundwater depths (>100 ft). Based on this determination and the date of the BGT registration, Hilcorp respectfully requests an exception/variance approval per 19.15.17.13(E)(5) NMAC (effective 6/16/2008; amended 7/16/2009) to proceed with final backfilling/re-contouring since all laboratory analytes in the 5-point composite soil sample are below closure thresholds listed in Table I of 19.15.29.12 NMAC for groundwater depths (>100 ft) and would be deemed non-reportable to the NMOCD. A Site Characterization performed by Ensolum, LLC is also being provided to further support Hilcorp's determination that this site falls in the least stringent Table 1 closure criteria for both 19.15.17.13 NMAC and 19.15.29.12 NMAC.

If any additional information is needed for this exception/variance request, please let me know.

Enclosures: Eurofins Lab Report (dated 7/10/2024)
Pit, Closed-Loop System, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application (received by the NMOCD on 12/12/2008)
Site Characterization (provided by Ensolum, LLC)

Hilcorp Energy Company
1111 Travis Street, Houston, Texas 77002
T 713.209.2400 F 713.289.2750



Environment Testing

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11

ANALYTICAL REPORT

PREPARED FOR

Attn: Mitch Killough
Hilcorp Energy
PO BOX 4700
Farmington, New Mexico 87499

Generated 7/10/2024 4:16:07 PM

JOB DESCRIPTION

Navajo 26 #001

JOB NUMBER

885-6995-1

Eurofins Albuquerque
4901 Hawkins NE
Albuquerque NM 87109

Eurofins Albuquerque

Job Notes

The test results in this report relate only to the samples as received by the laboratory and will meet all requirements of the methodology, with any exceptions noted. This report shall not be reproduced except in full, without the express written approval of the laboratory. All questions should be directed to the Eurofins Environment Testing South Central, LLC Project Manager.

Authorization



Generated
7/10/2024 4:16:07 PM

Authorized for release by
Michelle Garcia, Project Manager
michelle.garcia@et.eurofinsus.com
(505)345-3975

Client: Hilcorp Energy
Project/Site: Navajo 26 #001

Laboratory Job ID: 885-6995-1

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Definitions/Glossary

Client: Hilcorp Energy
Project/Site: Navajo 26 #001

Job ID: 885-6995-1

Qualifiers

GC VOA

Qualifier	Qualifier Description
S1+	Surrogate recovery exceeds control limits, high biased.

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
α	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
QC	Quality Control
RER	Relative Error Ratio (Radiochemistry)
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)
TNTC	Too Numerous To Count

Case Narrative

Client: Hilcorp Energy
Project: Navajo 26 #001

Job ID: 885-6995-1

Job ID: 885-6995-1

Eurofins Albuquerque

Job Narrative 885-6995-1

Analytical test results meet all requirements of the associated regulatory program listed on the Accreditation/Certification Summary Page unless otherwise noted under the individual analysis. Data qualifiers are applied to indicate exceptions. Noncompliant quality control (QC) is further explained in narrative comments.

- Matrix QC may not be reported if insufficient sample or site-specific QC samples were not submitted. In these situations, to demonstrate precision and accuracy at a batch level, a LCS/LCSD may be performed, unless otherwise specified in the method.
- Surrogate and/or isotope dilution analyte recoveries (if applicable) which are outside of the QC window are confirmed unless attributed to a dilution or otherwise noted in the narrative.

Regulated compliance samples (e.g. SDWA, NPDES) must comply with the associated agency requirements/permits.

Receipt

The sample was received on 6/27/2024 7:00 AM. Unless otherwise noted below, the sample arrived in good condition, and, where required, properly preserved and on ice. The temperature of the cooler at receipt time was 4.9°C.

Gasoline Range Organics

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

GC VOA

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Diesel Range Organics

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

HPLC/IC

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Eurofins Albuquerque

Client Sample Results

Client: Hilcorp Energy
Project/Site: Navajo 26 #001

Job ID: 885-6995-1

Client Sample ID: Bottom Comp

Lab Sample ID: 885-6995-1

Date Collected: 06/25/24 12:20

Matrix: Solid

Date Received: 06/27/24 07:00

Method: SW846 8015M/D - Gasoline Range Organics (GRO) (GC)									
Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac	
Gasoline Range Organics [C6 - C10]	ND		4.9	mg/Kg		06/27/24 13:48	07/04/24 06:13	1	
Method: SW846 8015M/D - Gasoline Range Organics (GRO) (GC)									
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac	
4-Bromofluorobenzene (Surr)	94		35 - 166			06/27/24 13:48	07/04/24 06:13	1	
Method: SW846 8021B - Volatile Organic Compounds (GC)									
Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac	
Benzene	ND		0.024	mg/Kg		06/27/24 13:48	07/04/24 06:13	1	
Ethylbenzene	ND		0.049	mg/Kg		06/27/24 13:48	07/04/24 06:13	1	
Toluene	ND		0.049	mg/Kg		06/27/24 13:48	07/04/24 06:13	1	
Xylenes, Total	ND		0.098	mg/Kg		06/27/24 13:48	07/04/24 06:13	1	
Method: SW846 8021B - Volatile Organic Compounds (GC)									
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac	
4-Bromofluorobenzene (Surr)	88		48 - 145			06/27/24 13:48	07/04/24 06:13	1	
Method: SW846 8015M/D - Diesel Range Organics (DRO) (GC)									
Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac	
Diesel Range Organics [C10-C28]	ND		9.7	mg/Kg		07/01/24 08:38	07/01/24 10:58	1	
Motor Oil Range Organics [C28-C40]	ND		49	mg/Kg		07/01/24 08:38	07/01/24 10:58	1	
Method: SW846 8015M/D - Diesel Range Organics (DRO) (GC)									
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac	
Di-n-octyl phthalate (Surr)	103		62 - 134			07/01/24 08:38	07/01/24 10:58	1	
Method: EPA 300.0 - Anions, Ion Chromatography									
Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac	
Chloride	1700		60	mg/Kg		06/28/24 09:56	06/28/24 20:43	20	

QC Sample Results

Client: Hilcorp Energy
Project/Site: Navajo 26 #001

Job ID: 885-6995-1

Method: 8015M/D - Gasoline Range Organics (GRO) (GC)

Lab Sample ID: MB 885-7510/1-A

Matrix: Solid

Analysis Batch: 7896

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 7510

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Gasoline Range Organics [C6 - C10]	ND		5.0	mg/Kg		06/27/24 13:48	07/04/24 02:42	1
Surrogate	MB %Recovery	MB Qualifier	Limits			Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	95		35 - 166			06/27/24 13:48	07/04/24 02:42	1

Lab Sample ID: LCS 885-7510/2-A

Matrix: Solid

Analysis Batch: 7896

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 7510

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Gasoline Range Organics [C6 - C10]	25.0	24.6		mg/Kg		98	70 - 130
Surrogate	LCS %Recovery	LCS Qualifier	Limits				
4-Bromofluorobenzene (Surr)	207	S1+	35 - 166				

Method: 8021B - Volatile Organic Compounds (GC)

Lab Sample ID: MB 885-7510/1-A

Matrix: Solid

Analysis Batch: 7897

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 7510

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	ND		0.025	mg/Kg		06/27/24 13:48	07/04/24 02:42	1
Ethylbenzene	ND		0.050	mg/Kg		06/27/24 13:48	07/04/24 02:42	1
Toluene	ND		0.050	mg/Kg		06/27/24 13:48	07/04/24 02:42	1
Xylenes, Total	ND		0.10	mg/Kg		06/27/24 13:48	07/04/24 02:42	1
Surrogate	MB %Recovery	MB Qualifier	Limits			Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	87		48 - 145			06/27/24 13:48	07/04/24 02:42	1

Lab Sample ID: LCS 885-7510/3-A

Matrix: Solid

Analysis Batch: 7897

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 7510

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Benzene	1.00	0.872		mg/Kg		87	70 - 130
Ethylbenzene	1.00	0.837		mg/Kg		84	70 - 130
m&p-Xylene	2.00	1.69		mg/Kg		84	70 - 130
o-Xylene	1.00	0.825		mg/Kg		83	70 - 130
Toluene	1.00	0.817		mg/Kg		82	70 - 130
Surrogate	LCS %Recovery	LCS Qualifier	Limits				
4-Bromofluorobenzene (Surr)	91		48 - 145				

Eurofins Albuquerque

QC Sample Results

Client: Hilcorp Energy
Project/Site: Navajo 26 #001

Job ID: 885-6995-1

Method: 8015M/D - Diesel Range Organics (DRO) (GC)

Lab Sample ID: MB 885-7664/1-A

Matrix: Solid

Analysis Batch: 7694

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 7664

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Diesel Range Organics [C10-C28]	ND		10	mg/Kg		07/01/24 08:38	07/01/24 10:07	1
Motor Oil Range Organics [C28-C40]	ND		50	mg/Kg		07/01/24 08:38	07/01/24 10:07	1
Surrogate	MB %Recovery	MB Qualifier	Limits			Prepared	Analyzed	Dil Fac
Di-n-octyl phthalate (Surr)	100		62 - 134			07/01/24 08:38	07/01/24 10:07	1

Lab Sample ID: LCS 885-7664/2-A

Matrix: Solid

Analysis Batch: 7694

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 7664

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Diesel Range Organics [C10-C28]	50.0	54.9		mg/Kg		110	60 - 135
Surrogate	LCS %Recovery	LCS Qualifier	Limits				
Di-n-octyl phthalate (Surr)	113		62 - 134				

Method: 300.0 - Anions, Ion Chromatography

Lab Sample ID: MB 885-7593/1-A

Matrix: Solid

Analysis Batch: 7597

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 7593

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Chloride	ND		3.0	mg/Kg		06/28/24 09:56	06/28/24 16:59	1
Surrogate	LCS %Recovery	LCS Qualifier	Limits					
Chloride	30.0		27.9	mg/Kg		93	90 - 110	

Eurofins Albuquerque

QC Association Summary

Client: Hilcorp Energy
Project/Site: Navajo 26 #001

Job ID: 885-6995-1

GC VOA

Prep Batch: 7510

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
885-6995-1	Bottom Comp	Total/NA	Solid	5030C	
MB 885-7510/1-A	Method Blank	Total/NA	Solid	5030C	
LCS 885-7510/2-A	Lab Control Sample	Total/NA	Solid	5030C	
LCS 885-7510/3-A	Lab Control Sample	Total/NA	Solid	5030C	

Analysis Batch: 7896

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
885-6995-1	Bottom Comp	Total/NA	Solid	8015M/D	7510
MB 885-7510/1-A	Method Blank	Total/NA	Solid	8015M/D	7510
LCS 885-7510/2-A	Lab Control Sample	Total/NA	Solid	8015M/D	7510

Analysis Batch: 7897

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
885-6995-1	Bottom Comp	Total/NA	Solid	8021B	7510
MB 885-7510/1-A	Method Blank	Total/NA	Solid	8021B	7510
LCS 885-7510/3-A	Lab Control Sample	Total/NA	Solid	8021B	7510

GC Semi VOA

Prep Batch: 7664

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
885-6995-1	Bottom Comp	Total/NA	Solid	SHAKE	
MB 885-7664/1-A	Method Blank	Total/NA	Solid	SHAKE	
LCS 885-7664/2-A	Lab Control Sample	Total/NA	Solid	SHAKE	

Analysis Batch: 7694

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
885-6995-1	Bottom Comp	Total/NA	Solid	8015M/D	7664
MB 885-7664/1-A	Method Blank	Total/NA	Solid	8015M/D	7664
LCS 885-7664/2-A	Lab Control Sample	Total/NA	Solid	8015M/D	7664

HPLC/IC

Prep Batch: 7593

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
885-6995-1	Bottom Comp	Total/NA	Solid	300_Prep	
MB 885-7593/1-A	Method Blank	Total/NA	Solid	300_Prep	
LCS 885-7593/2-A	Lab Control Sample	Total/NA	Solid	300_Prep	

Analysis Batch: 7597

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
885-6995-1	Bottom Comp	Total/NA	Solid	300.0	7593
MB 885-7593/1-A	Method Blank	Total/NA	Solid	300.0	7593
LCS 885-7593/2-A	Lab Control Sample	Total/NA	Solid	300.0	7593

Lab Chronicle

Client: Hilcorp Energy
Project/Site: Navajo 26 #001

Job ID: 885-6995-1

Client Sample ID: Bottom Comp
Date Collected: 06/25/24 12:20
Date Received: 06/27/24 07:00

Lab Sample ID: 885-6995-1
Matrix: Solid

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Prep	5030C			7510	AT	EET ALB	06/27/24 13:48
Total/NA	Analysis	8015M/D		1	7896	JP	EET ALB	07/04/24 06:13
Total/NA	Prep	5030C			7510	AT	EET ALB	06/27/24 13:48
Total/NA	Analysis	8021B		1	7897	JP	EET ALB	07/04/24 06:13
Total/NA	Prep	SHAKE			7664	KR	EET ALB	07/01/24 08:38
Total/NA	Analysis	8015M/D		1	7694	DH	EET ALB	07/01/24 10:58
Total/NA	Prep	300_Prep			7593	RC	EET ALB	06/28/24 09:56
Total/NA	Analysis	300.0		20	7597	RC	EET ALB	06/28/24 20:43

Laboratory References:
EET ALB = Eurofins Albuquerque, 4901 Hawkins NE, Albuquerque, NM 87109, TEL (505)345-3975

Accreditation/Certification Summary

Client: Hilcorp Energy
Project/Site: Navajo 26 #001

Job ID: 885-6995-1

Laboratory: Eurofins Albuquerque

Unless otherwise noted, all analytes for this laboratory were covered under each accreditation/certification below.

Authority	Program	Identification Number	Expiration Date
New Mexico	State	NM9425, NM0901	02-26-25
The following analytes are included in this report, but the laboratory is not certified by the governing authority. This list may include analytes for which the agency does not offer certification.			
Analysis Method	Prep Method	Matrix	Analyte
300.0	300_Prep	Solid	Chloride
8015M/D	5030C	Solid	Gasoline Range Organics [C6 - C10]
8015M/D	SHAKE	Solid	Diesel Range Organics [C10-C28]
8015M/D	SHAKE	Solid	Motor Oil Range Organics [C28-C40]
8021B	5030C	Solid	Benzene
8021B	5030C	Solid	Ethylbenzene
8021B	5030C	Solid	Toluene
8021B	5030C	Solid	Xylenes, Total
Oregon	NELAP	NM100001	02-26-25

HALL ENVIRONMENTAL ANALYSIS LABORATORY

www.hallenvironmental.com

4901 Hawkins NE - Albuquerque, NM 8710885-6995 Coc

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

Analysis Request

[illegible]

Login Sample Receipt Checklist

Client: Hilcorp Energy

Job Number: 885-6995-1

Login Number: 6995

List Source: Eurofins Albuquerque

List Number: 1

Creator: Casarrubias, Tracy

Question	Answer	Comment
Radioactivity wasn't checked or is </= background as measured by a survey meter.	True	
The cooler's custody seal, if present, is intact.	True	
Sample custody seals, if present, are intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	N/A	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, 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

For temporary pits, closed-loop systems, and below-grade tanks, submit to the appropriate NMOCD District Office.
For permanent pits and exceptions submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

**Pit, Closed-Loop System, Below-Grade Tank, or
Proposed Alternative Method Permit or Closure Plan Application**

Type of action: ☒ Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method
Existing BGT ☐ Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method
Legacy BGT1 ☐ Modification to an existing permit
☐ Closure plan only submitted for an existing permitted or non-permitted pit, closed-loop system, below-grade tank, or proposed alternative method

Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, 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: XTO Energy, Inc. OGRID #: 5380
Address: #382 County Road 3100, Aztec, NM 87410
Facility or well name: Navajo 26 #1
API Number: 30-045-30099 OCD Permit Number: _____
U/L or Qtr/Qtr I Section 26 Township 29N Range 14W County: San Juan
Center of Proposed Design: Latitude 36.693799 Longitude 108.284011 NAD: ☐ 1927 ☒ 1983
Surface Owner: ☐ Federal ☐ State ☐ Private ☒ Tribal Trust or Indian Allotment

2. ☐ **Pit:** Subsection F or G of 19.15.17.11 NMAC
Temporary: ☐ Drilling ☐ Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A
☐ 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. ☐ **Closed-loop System:** Subsection H of 19.15.17.11 NMAC
Type of Operation: ☐ P&A ☐ Drilling a new well ☐ Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent)
☐ Drying Pad ☐ Above Ground Steel Tanks ☐ Haul-off Bins ☐ Other _____
☐ Lined ☐ Unlined Liner type: Thickness _____ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other _____
Liner Seams: ☐ Welded ☐ Factory ☐ Other _____

4. ☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC
Volume: 21 bbl Type of fluid: Produced Water
Tank Construction material: Steel
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☒ Other Visible sidewalls, vaulted, automatic high-level shut off, no liner
Liner type: Thickness _____ mil ☐ HDPE ☐ PVC ☐ Other _____

5. ☐ **Alternative Method:**
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

6.

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 Four foot height, steel mesh field fence (hogwire) with pipe top railing

7.

Netting: Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)

- ☐ Screen ☐ Netting ☒ Other Expanded metal or solid vaulted top
- ☐ Monthly inspections (If netting or screening is not physically feasible)

8.

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 19.15.3.103 NMAC

9.

Administrative Approvals 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:

- ☐ Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau office for consideration of approval.
- ☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

10.

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. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to drying pads or above-grade tanks associated with a closed-loop system.*

Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (Applies to temporary, emergency, or cavitation pits and below-grade tanks) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (Applies to permanent pits) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	<input checked="" 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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 500 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 checked="" type="checkbox"/> No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

11.

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: _____

12.

Closed-loop Systems 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.

- ☐ Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9
☐ Siting Criteria Compliance Demonstrations (only for on-site closure) - 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: _____
☐ Previously Approved Operating and Maintenance Plan API Number: _____ (Applies only to closed-loop system that use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)

13.

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

14.

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 ☐ Closed-loop System
☐ 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 (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

15.

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 F 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 I of 19.15.17.13 NMAC
☒ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

16.

Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only: (19.15.17.13.D NMAC)

Instructions: Please identify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Will any of the proposed closed-loop system operations and associated activities occur on or in areas that *will not* be used for future service and operations?

☐ Yes (If yes, please provide the information below) ☐ No

Required for impacted areas which will not be used for future service and operations:

- ☐ 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 I of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

17.

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 may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 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 between 50 and 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

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 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 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 private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, 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

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 500 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ 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

18.

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 F of 19.15.17.13 NMAC
☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements 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 Subsection F of 19.15.17.13 NMAC
☐ Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F 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 I of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

19.

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): Kim Champlin Title: Environmental Representative
 Signature: Kim Champlin Date: 12-10-08
 e-mail address: kim_champlin@xtoenergy.com Telephone: (505) 333-3100

20.

OCD Approval: ☒ Permit Application (including closure plan) ☐ Closure Plan (only) ☐ OCD Conditions (see attachment)

OCD Representative Signature: Shelly Wells Approval Date: 08/22/2022

Title: Environmental Specialist-A OCD Permit Number: Legacy BGT1

21.

Closure Report (required within 60 days of closure completion): Subsection K of 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: _____

22.

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.

23.

Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:

Instructions: Please identify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Were the closed-loop system operations and associated activities performed on or in areas that *will not* be used for future service and operations?

☐ Yes (If yes, please demonstrate compliance to the items below) ☐ No

Required for impacted areas which will not be used for future service and operations:

- ☐ Site Reclamation (Photo Documentation)
☐ Soil Backfilling and Cover Installation
☐ Re-vegetation Application Rates and Seeding Technique

24.

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)
☐ 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

25.

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): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

District I

1625 N. French Dr., Hobbs, NM 88240

District II

811 South First, Artesia, NM 88210

District III

1000 Rio Brazos Rd., Aztec, NM 87410

District IV

2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy, Minerals & Natural ResourcesOIL CONSERVATION DIVISION
2040 South Pacheco
Santa Fe, NM 87505

Form C-102

Revised March 17, 1994

Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number 30-045-300 99		² Pool Code 71629 & 79680	³ Pool Name FRUIT. COAL & W. KUTZ PC EX
⁴ Property Code 29191	⁵ Property Name WF Navajo 26		⁶ Well Number 2-1
⁷ OGRIB No. 019219	⁸ Operator Name RICHARDSON OPERATING COMPANY		⁹ Elevation 5870'

¹⁰ Surface Location

U/L or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
L.	26	29 N	14 W		1415'	South	1150'	West	San Juan


¹¹ Bottom Hole Location If Different From Surface

U/L or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County

¹² Dedicated Acres	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ Order No.
320 AC 160 PC			

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A
NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

	¹⁶	¹⁷ OPERATOR CERTIFICATION I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief Signature BRIAN WOOD Printed Name CONSULTANT Title DEC. 31, 1999 Date
	¹⁸ SURVEYOR CERTIFICATION I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief. Date of Survey Signature and Seal of Professional Surveyor Certificate Number	

 Lodestar Services, Inc. PO Box 4465, Durango, CO 81302		Pit Permit Siting Criteria Information Sheet		Client:	XTO Energy				
				Project:	Pit Permits				
				Revised:	10/24/2008				
				Prepared by:	Daniel Newman				
API#:		3004530099		USPLSS:		T29N,R14W,26I			
Name:		NAVAJO 26 #1		Lat/Long:		36.693799 / -108.284011			
Depth to groundwater:		<100'		Geologic formation:		Kirtland and Fruitland Formations			
Distance to closest continuously flowing watercourse:		2.53 miles south of the San Juan River							
Distance to closest significant watercourse, lakebed, playa lake, or sinkhole:		2,052' south of an unnamed arroyo							
Permanent residence, school, hospital, institution or church within 300'		No		Soil Type:				Entisols	
Domestic fresh water well or spring within 500'		No		Annual Precipitation:		8.08 inches average			
Any other fresh water well or spring within 1000'		on the rim of an unnamed arroyo		Precipitation Notes:		no significant precipitation events			
Within incorporated municipal boundaries		No		Attached Documents:					
Within defined municipal fresh water well field		No				Topo map, ground water data map, ariel photo, mines and quarries map			
Wetland within 500'		No		Mining Activity:		No			
Within unstable area		No							
Within 100 year flood plain		No FEMA Data Available							
Additional Notes:									

NAVAJO 26 #1 Below Ground Tank Hydrogeologic Report for Siting Criteria

General Geology and Hydrology

The San Juan Basin is a typical Rocky Mountain basin with a gently dipping southern flank and a steeply dipping northern flank. Asymmetrically layered Tertiary sandstones and shales, along with Quaternary alluvial deposits, dominate surficial geology (Dane and Bachman, 1965). The proposed pit location will be situated in the northwestern Bisti region, atop sandstone outcrops just south of the San Juan River.

The predominant geologic formation is the Fruitland Formation/Kirtland Shale of Late Cretaceous age, which underlies surface soils and is often exposed as broad shaley hills (Dane and Bachman, 1965). Deposits of Quaternary alluvial sands also occur prominently near the surface of the area, especially near streams and washes. The Fruitland Formation consists of interbedded sandy shale, carbonaceous shale, sandstone and coal units. The Kirtland Shale is divided into a lower shale member, a middle sandstone unit and an upper sandy shale member. The two formations are difficult to differentiate and are often treated together. The combined thickness of the Fruitland-Kirtland interval ranges from 100 to 2000 feet (Stone et al., 1983). This particular site sits within the middle sandstone unit.

Cretaceous and Tertiary sandstones, as well as Quaternary alluvial deposits serve as the primary aquifers in the San Juan Basin (Stone et al., 1983). Aquifers within the Fruitland-Kirtland Formations are primarily limited to the Farmington Sandstone Member, which is the middle unit within the Kirtland Shale. Reported discharge from stock wells is about 10 gallons per minute (Stone et al., 1983). The aquifer supplies low yielding stock wells.

The prominent soil type at the proposed site is entisols, which are defined as soils that exhibit little to no profile development (www.emnrd.state.nm.us). Soils are basically unaltered from their parent rock. Miles of arroyos, washes and intermittent streams exist as part of the drainage network towards the San Juan River. These features often cut into soil and other unconsolidated materials, contributing to sedimentation downstream. The sudden influx of water from storm events easily erodes the soils that cover the area and prohibits effective recharge to the underlying aquifers.

Dry and arid weather further prohibit active recharge. The climate of the region is arid, averaging just over 8 inches of rainfall annually. As is typical of the southwestern United States monsoonal weather patterns, most precipitation falls from August through October. The heaviest rainfall occurs in the summer in isolated, intense cloudbursts. November through June is relatively dry. Snow generally falls from December to mid-February and averages less than one-half inch in depth. However, most recharge occurs during the winter months during snowmelt periods from the upper elevations (Western Regional Climate Center www.wrcc.dri.edu).

The predominant vegetation is sagebrush and grasses with a more restricted pinon-juniper association (Dick-Peddie, 1993).

Site Specific Hydrogeology

Depth to groundwater is estimated to be greater than 100 feet. This estimation is based on data from Stone and others (1983), the USGS Groundwater Atlas of the United States and depth to groundwater data published on the New Mexico State Engineer's iWaters Database website. Local topography and proximity to surface hydrologic features are also taken into consideration.

Beds of water-yielding sandstone are primarily confined to the Farmington Sandstone Member of the Fruitland Formation, which is 20-480 feet thick (Stone et al., 1983). The site is located in a shaley unit of the Fruitland Formation, as evidenced by the relatively flat topography that is easily eroded by arroyos. The eroded surfaces of the arroyos do not expose thick sequences of sandstone outcrops, the presence of which might indicate a water-bearing unit within the immediate subsurface.

The site in question is located on a relatively flat mesa top at an elevation of approximately 5,856 feet. Groundwater is expected to be shallow near the San Juan River, but the significant distance between the river and the site, as well as an elevation difference of almost 300 feet suggest groundwater is greater than 100 feet at the proposed site.

This rural site location does contain an abundant amount of groundwater elevation data. Groundwater data available from the NM State Engineer's iWaters Database for wells near the proposed site are attached. The closest well to the proposed site sits at an elevation of approximately 5,254 feet, at a distance of approximately 2.75 miles to the northeast. This site puts groundwater at a distance of 30 feet below the ground surface.

Lined channels associated with the Navajo Irrigation Project supply water for the fields surrounding the proposed site, which are characterized by center-pivot irrigation patterns. During spring and summer, irrigation practices often produces shallow perched aquifers that are not defined in published literature. These shallow zones of water are not continuous and are not saturated year round.

Examination of the topography and the groundwater well data indicate groundwater depth to be greater than 100 feet.



TOPOGRAPHIC MAP

NAVAJO 26 #1
T29N, R14W, 26L
SAN JUAN COUNTY, NM

Lodestar Services, Inc
PO Box 4465
Durango, CO 81302



i-Waters Ground Water Data
Map

NAVAJO 26 #1
T29N,R14W,26L
SAN JUAN COUNTY, NM

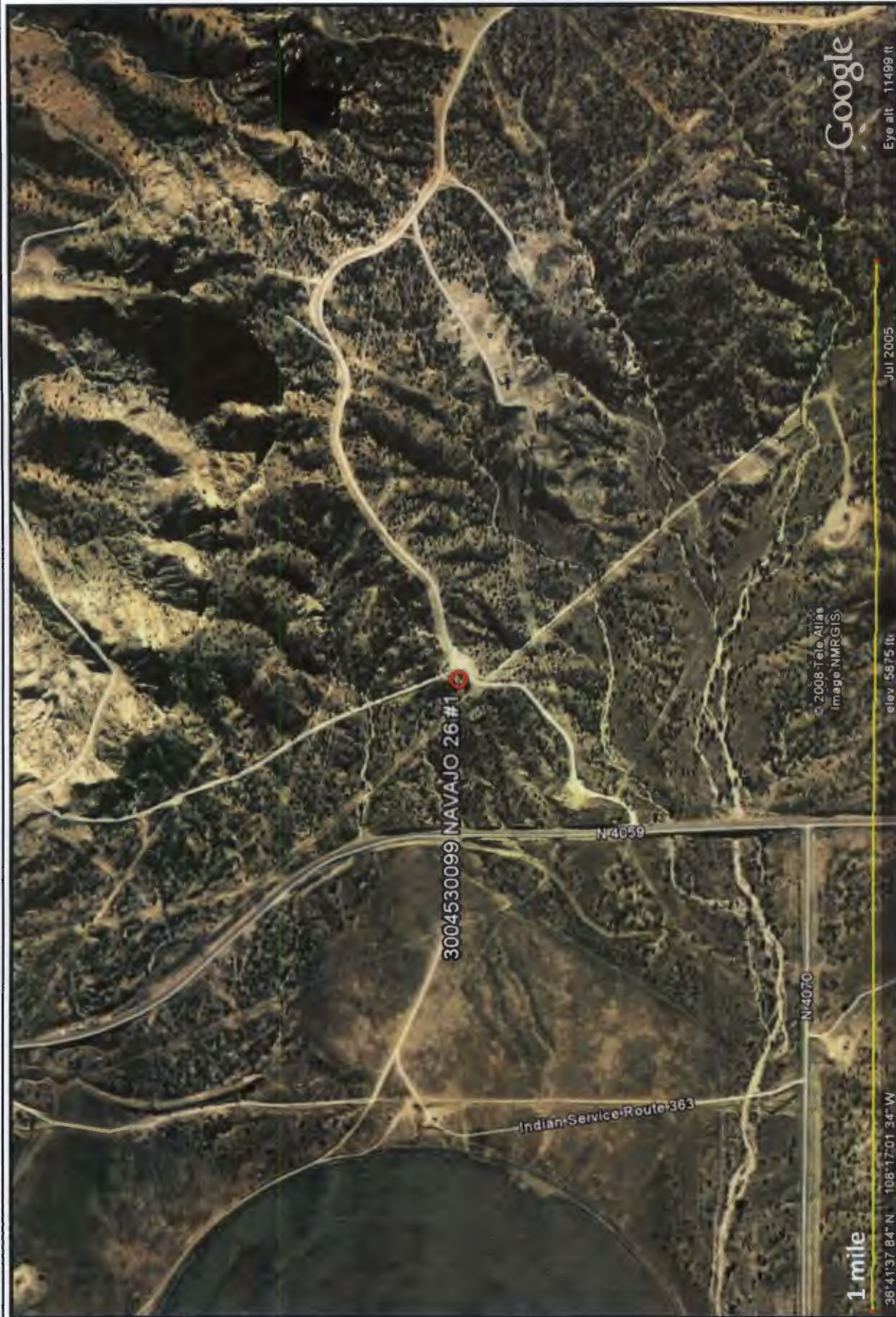
Lodestar Services, Inc
PO Box 4465
Durango, CO 81302

**New Mexico Office of the State Engineer
New Mexico Office of the State Engineer
POD Reports and Downloads**

AVERAGE DEPTH OF WATER REPORT 10/21/2008								(Depth Water in Feet)		
Bsn	Tws	Rng	Sec	Zone	X	Y	Wells	Min	Max	Avg
RG	29N	13W	19				1	30	30	30
RG	29N	13W	29	C			1	6	6	6
SJ	29N	13W	01				4	18	40	28
SJ	29N	13W	02				7	17	90	34
SJ	29N	13W	04				2	10	16	13
SJ	29N	13W	05				4	10	20	16
SJ	29N	13W	06				1	12	12	12
SJ	29N	13W	08				2	4	30	17
SJ	29N	13W	09				13	9	50	17
SJ	29N	13W	10				15	9	38	20
SJ	29N	13W	11				9	10	39	19
SJ	29N	13W	14				33	4	30	6
SJ	29N	13W	15				2	4	25	15
SJ	29N	13W	16				3	21	35	27
SJ	29N	13W	17				2	8	20	14
SJ	29N	13W	18				1	11	11	11
SJ	29N	13W	21				3	6	20	11
SJ	29N	13W	21		261218	2079099	1	5	5	5
SJ	29N	13W	22				28	7	35	16
SJ	29N	13W	22		261533	2080965	1	15	15	15
SJ	29N	13W	23				7	6	30	15
SJ	29N	13W	24				1	32	32	32
SJ	29N	13W	25				1	75	75	75

New Mexico Office of the State Engineer
POD Reports and Downloads

AVERAGE DEPTH OF WATER REPORT 10/21/2008										
							(Depth Water in Feet)			
Bsn	Tws	Rng	Sec	Zone	X	Y	Wells	Min	Max	Avg
SJ	29N	14W	05				1	90	90	90
SJ	29N	14W	06				2	30	52	41
SJ	29N	14W	07				6	6	50	24
SJ	29N	14W	08				3	50	275	132
SJ	29N	14W	12		259584	2086850	1	20	20	20
SJ	29N	14W	13				2	4	10	7
SJ	29N	14W	13		259540	2085641	1	6	6	6
SJ	29N	14W	17				7	3	28	13
SJ	29N	14W	18				6	7	25	17



AERIAL PHOTOGRAPH

NAVAJO 26 #1
T29N,R14W,26L
SAN JUAN COUNTY, NMLodestar Services, Inc
PO Box 4465
Durango, CO 81302



Mines and Quarries Map

NAVAJO 26 #1
T29N,R14W,26L
SAN JUAN COUNTY, NM

Lodestar Services, Inc
PO Box 4465
Durango, CO 81302

XTO Energy Inc.
San Juan Basin (Northwest New Mexico)
General Design and Construction Plan
For Below-Grade Tanks

In accordance with Rule 19.15.17.11 NMAC the following information describes the design and construction of below-grade tanks on XTO Energy Inc. (XTO) locations. This is XTO's standard procedure for all below-grade tanks. A separate plan will be submitted for any below-grade tank which does not conform to this plan.

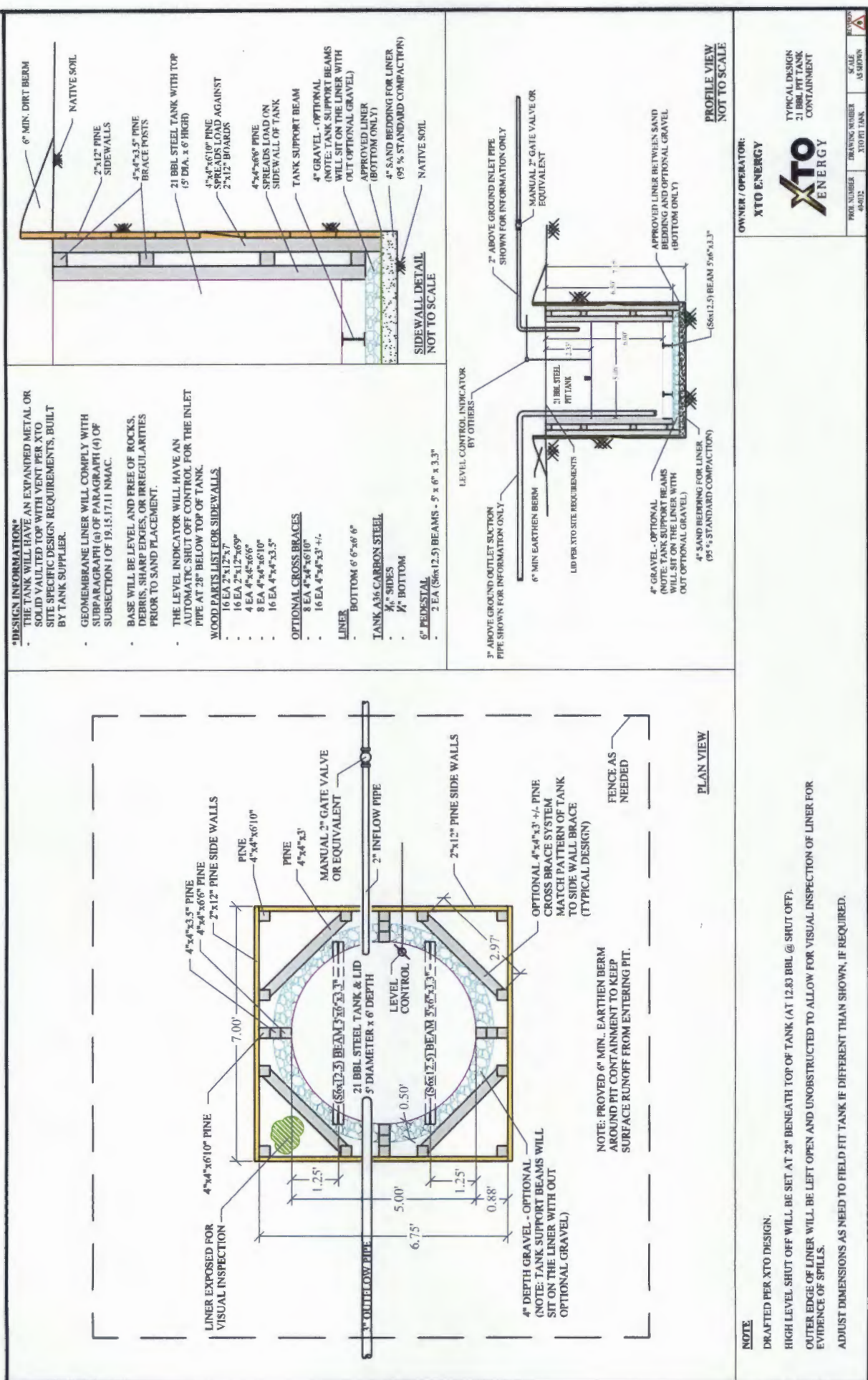
General Plan

1. XTO will design and construct below-grade tanks to contain liquids and solids and prevent contamination of fresh water and protect public health and environment.
2. XTO will post a well sign, in compliance with 19.15.3.103 NMAC, on the existing well site operated by XTO where the existing below-grade tank is located. The sign will list the Operator on record as the operator, the location of the well site by unit letter, section, township, range, and emergency telephone numbers.
3. XTO is requesting approval of an alternative fencing to be used on below-grade tank locations. Below-grade tank locations will be fenced utilizing 48" steel mesh field-fence (hogwire) with pipe railing along the top. A 6' chain link fence will be utilized around the well pad if the well site is within a city limits or ¼ mile of a permanent residence, school, hospital, institution or church. Below-grade tanks located within 1000' of a permanent residence, school, hospital, institution or church will be fenced by 6' chain link fence with at least two strands of barbed wire at the top. All gates associated with below-grade tanks will remain closed and locked when responsible individuals are not on site.
4. XTO shall construct below-grade tanks with an expanded metal covering or solid vaulted top on the top of the below-grade tank.
5. XTO will ensure that below-grade tanks are constructed of materials resistant to the below-grade tank's particular contents and resistant to damage from sunlight. Tanks will be constructed of A36 carbon steel with 3/16" sides and ¼" bottom. (See attached drawing).
6. The below-grade tank system will have a properly constructed foundation consisting of a level base free of rocks, debris, sharp edges or irregularities to prevent punctures, cracks or indentations of the liner or tank bottom. Sand bedding (4") will be placed on top of a level foundation to ensure prevention of punctures, cracks or indentations of the liner or tank bottom.
7. XTO will construct a berm and/or diversion ditch in a manner that prevents the collection of surface water run-on. Below-grade tanks will be equipped with automatic high level shut-off devices as well as manually operated shut-off valves. (See attached drawing).
8. XTO will construct and use below-grade tanks that do not have double walls. The below-grade tank sidewalls will be open for visual inspection for leaks. The sidewalls of the cellar will be constructed with 2" X 12" pine sidewalls and 4" X 4" pine brace posts. The below-grade tank

XTO Energy Inc.
San Juan Basin (Northwest New Mexico)
General Design and Construction Plan
For Below-Grade Tanks
Page 2

bottom will be elevated a minimum of 6" above the underlying ground surface and the below-grade tank will be underlain with a geomembrane liner to divert leaked liquid to a location that can be visually inspected. (See attached drawing).

9. XTO will equip below-grade tanks designed in this manner with a properly functioning automatic high-level shut-off control device and manual controls to prevent overflows. (See attached drawing).
10. XTO will demonstrate to the OCD that the geomembrane liner complies with the specifications of Subparagraph (a) of Paragraph (4) of Subsection I of 19.15.17.11 NMAC and obtain approval from OCD prior to the installation of the design. The geomembrane liner shall have a hydraulic conductivity no greater than 1×10^{-9} cm/sec. The geomembrane liner shall be composed of an impervious, synthetic material that is resistant to petroleum hydrocarbons, salts and acidics and alkaline solutions. The liner material shall be resistant to ultraviolet light. Liner compatibility shall comply with EPA SW-846 method 9090A. (See attached drawing).
11. The general specifications for design and construction are attached.



XTO Energy Inc.
San Juan Basin (Northwest New Mexico)
General Maintenance and Operating Plan
For Below-Grade Tanks

In accordance with Rule 19.15.17.12 NMAC the following information describes the operation and maintenance of below-grade tanks on XTO Energy Inc. (XTO) locations. This is XTO's standard procedure for all below-grade tanks. A separate plan will be submitted for any below-grade tank which does not conform to this plan.

General Plan

1. XTO will operate and maintain below-grade tanks to contain liquids and solids, maintain the integrity of the liner and secondary containment system, prevent contamination of fresh water and protect public health and the environment. Fluid levels will be monitored weekly and high levels will be removed as necessary. Monthly inspections will be conducted to monitor integrity of below-grade tank systems and below-grade tanks will be equipped with automatic high-level shut-off devices.
2. XTO will not allow below-grade tanks to overflow and will use berms and/or diversion ditch to prevent surface run on to enter the below-grade tank. Below-grade tanks will be equipped with automatic high-level shut-off control devices as well as manually operated shut-off valves. See attached drawing for vault design and placement of diversion berms and shut-off devices.
3. XTO will continuously remove any visible or measurable layer of oil from the fluid surface of below-grade tanks in order to prevent significant accumulation of oil.
4. XTO will inspect the below-grade tank monthly and maintain written records for five years. Monthly inspections will consist of documenting the following: (see attached template),
 - Well Name
 - API #
 - Sec., Twn., Rng.
 - XTO Inspector's name
 - Inspection date and time
 - Visible tears in liner
 - Visible signs of tank overflow
 - Collection of surface run on
 - Visible layer of oil
 - Visible signs of tank leak
 - Estimated freeboard
5. XTO will maintain adequate freeboard to prevent over topping of the below-grade tank. High level shut-off devices control the freeboard at an average of 28" beneath the top of the tank.
6. XTO will not discharge into or store any hazardous waste in any below-grade tank.
7. If a below-grade tank develops a leak, or if any penetration of a below-grade tank occurs below the liquids surface, XTO will remove all liquids above the damage or leak line within 48 hours,

XTO Energy Inc.
San Juan Basin (Northwest New Mexico)
General Maintenance and Operating Plan
For Below-Grade Tanks
Page 2

notify the appropriate division district office within 48 hours of the discovery and repair the damage or replace the below-grade tank. If an existing below-grade tank does not meet current requirements of Paragraphs 1-4 of Subsection I of 19.15.17.11 NMAC the tank will be modified or retrofitted to comply. If compliance can not be achieved XTO will implement the approved closure plan.

**XTO Energy Inc.
San Juan Basin (Northwest New Mexico)
General Closure Plan
For Below-Grade Tanks**

In accordance with Rule 19.15.17.13 NMAC the following information describes the closure requirements of below-grade tanks on XTO Energy Inc. (XTO) locations. This is XTO's standard procedure for all below-grade tanks. A separate plan will be submitted for any below-grade tank which does not conform to this plan.

General Plan

1. XTO will close below-grade tanks within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the division requires because of imminent danger to fresh water, public health or the environment.
2. XTO will close a below-grade tank that does 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 after June 16, 2008, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC.
3. XTO will close a permitted below-grade tank within 60 days of cessation of the below-grade tank's operation or as required by the transitional provisions of Subsection B of 19.15.17.17 NMAC in accordance with a closure plan that the appropriate division district office approves. The closure report will be filed on form C-144.
4. XTO will remove liquids and sludge from below-grade tanks prior to implementing a closure method and will dispose of the liquids and sludge in a division-approved facility. Approved facilities and waste streams include:
 - Envirotech Permit No. NM01-0011 and IEI Permit No. NM 01-0010B
 - Soil contaminated by exempt petroleum hydrocarbons
 - Produced sand, pit sludge and contaminated bottoms from storage of exempt wastes
 - Basin Disposal Permit No. NM01-005
 - Produced water
5. XTO will 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 has approved prior to removal. Any associated liners will be removed, properly cleaned and disposed of per 19.15.9.712 NMAC at San Juan County Landfill. Documentation of the final disposition will be included in the closure report.
6. XTO will remove any on-site equipment associated with a below-grade tank unless the equipment is required for some other purpose.
7. XTO will test the soils beneath the below-grade tank to determine whether a release has occurred. At a minimum 5 point composite sample will be collected along with individual grab samples from any area that is wet, discolored or showing other evidence of a release. Samples will be

XTO Energy Inc.
San Juan Basin (Northwest New Mexico)
General Closure Plan
For Below-Grade Tanks
Page 2

analyzed for BTEX, TPH and chlorides to demonstrate that the benzene concentration, as determined by EPA SW-846 methods 8021B or 8260B or EPA method that the division approves, does not exceed 0.2 mg/kg; total BTEX concentration, as determined by EPA SW-846 methods 8021B or 8260B or other EPA method that the division approves, does not exceed 50 mg/kg; the TPH concentration, as determined by EPA method 418.1 or other EPA method that the division approves, does not exceed 100mg/kg; and the chloride concentration, as determined by EPA method 300.1 or other EPA method that the division approves, does not exceed 250 mg/kg, or the background concentration, whichever is greater. XTO will notify the division of its results on form C-141.

8. If XTO or the division determines that a release has occurred, XTO will comply with 19.15.3.116 NMAC and 19.15.1.19NMAC as appropriate.
9. If the sampling program demonstrates that a release has not occurred or that any release does not exceed the concentrations specified in Paragraph (4) of Subsection E of 19.15.17.13 NMAC, XTO will backfill the excavation with compacted, non-waste containing, earthen material; construct a division prescribed soil cover; recontour and re-vegetate the site.
10. Notice of Closure operations will be given to the Aztec Division District III office between 72 hours and one week prior to the start of closure activities via email or verbally. The notification will include the following:
 - i. Operator's name
 - ii. Well Name and API Number
 - iii. Location by Unit Letter, Section, Township, and Range

The surface owner shall also be notified prior to the implementation of any closure operations of below-grade tanks as per the approved closure plan using certified mail, return receipt requested.

11. Re-contouring of location will match fit, shape, line, form and texture of the surrounding area. 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 placed 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.
12. A minimum of 4 feet of cover shall be achieved and the cover shall include 1 foot of suitable material to establish vegetation at the site, or the background thickness of topsoil, whichever is greater. Soil cover will be constructed to the site's existing grade and ponding of water and erosion of the cover material will be prevented with drainage control, natural drainages and silt traps where needed.
13. XTO will seed the disturbed areas the first growing season after the operator closes the pit. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved methods. BLM or Forest Service stipulated seed mixes will be used on federal lands. Vegetative cover will equal 70% of the native perennial vegetative cover (un-impacted) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintain that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs.

XTO Energy Inc.
San Juan Basin (Northwest New Mexico)
General Closure Plan
For Below-Grade Tanks
Page 3

14. All closure activities will include proper documentation and be available for review upon request and will be submitted in closure report form to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on form C-144 and incorporate the following:
 - i. Proof of closure notice to division and surface owner;
 - ii. Details on capping and covering, where applicable;
 - iii. Inspection reports;
 - iv. Confirmation sampling analytical results;
 - v. Disposal facility name(s) and permit number(s);
 - vi. Soil backfilling and cover installation;
 - vii. Re-vegetation application rates and seeding techniques, (or approved alternative to re-vegetation requirements if applicable);
 - viii. Photo documentation of the site reclamation.

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

QUESTIONS

Action 132360

QUESTIONS

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 132360
	Action Type: [C-144] Legacy Below Grade Tank Plan (C-144LB)

QUESTIONS

Facility and Ground Water	
<i>Please answer as many of these questions as possible in this group. More information will help us identify the appropriate associations in the system.</i>	
Facility or Site Name	NAVAJO 26 1
Facility ID (##), if known	Not answered.
Facility Type	Below Grade Tank - (BGT)
Well Name, include well number	NAVAJO 26 1
Well API, if associated with a well	3004530099
Pit / Tank Type	Not answered.
Pit / Tank Name or Identifier	Not answered.
Pit / Tank Opened Date, if known	Not answered.
Pit / Tank Dimensions, Length (ft)	Not answered.
Pit / Tank Dimensions, Width or Diameter (ft)	Not answered.
Pit / Tank Dimensions, Depth (ft)	Not answered.
Ground Water Depth (ft)	Not answered.
Ground Water Impact	Not answered.
Ground Water Quality (TDS)	Not answered.

Below-Grade Tank	
<i>Subsection I of 19.15.17.11 NMAC</i>	
Volume / Capacity (bbls)	21
Type of Fluid	Produced Water
Pit / Tank Construction Material	Steel
Secondary containment with leak detection	Not answered.
Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off	Not answered.
Visible sidewalls and liner	Not answered.
Visible sidewalls only	True
Tank installed prior to June 18, 2008	True
Other, Visible Notation. Please specify	Not answered.
Liner Thickness (mil)	Not answered.
HDPE (Liner Type)	Not answered.
PVC (Liner Type)	Not answered.
Other, Liner Type. Please specify (Variance Required)	Not answered.

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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

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Oil Conservation Division
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QUESTIONS, Page 2

Action 132360

QUESTIONS (continued)

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 132360
	Action Type: [C-144] Legacy Below Grade Tank Plan (C-144LB)

QUESTIONS

Fencing <i>Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)</i>	
Chain link, six feet in height, two strands of barbed wire at top <i>(Required if located within 1000 feet of a permanent residence, school, hospital, institution or church)</i>	Not answered.
Four foot height, four strands of barbed wire evenly spaced between one and four feet	Not answered.
Alternate, Fencing. Please specify (Variance Required)	4' hogwire

Netting <i>Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)</i>	
Screen	Not answered.
Netting	Not answered.
Other, Netting. Please specify (Variance May Be Needed)	expanded metal or solid vaulted top

Signs <i>Subsection C of 19.15.17.11 NMAC (If there are multiple operators at a site, each operator must have their own sign in compliance with Subsection C of 19.15.17.11 NMAC.)</i>	
12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers	Not answered.
Signed in compliance with 19.15.16.8 NMAC	True

Variances and Exceptions <i>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:</i>	
Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.	Not answered.
Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval	Not answered.

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QUESTIONS, Page 3

Action 132360

QUESTIONS (continued)

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 132360
	Action Type: [C-144] Legacy Below Grade Tank Plan (C-144LB)

QUESTIONS**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.

Siting Criteria, General Siting

Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank	No
NM Office of the State Engineer - iWATERS database search	True
USGS	Not answered.
Data obtained from nearby wells	Not answered.

Siting Criteria, Below Grade Tanks

Within 100 feet of a continuously flowing watercourse, significant watercourse, lakebed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark)	No
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption	No

Proposed Closure Method

Below-grade Tank	Below Grade Tank - (BGT)
Waste Excavation and Removal	True
Alternate Closure Method. Please specify (Variance Required)	Not answered.

Operator Application Certification

Registered / Signature Date	12/10/2008
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ACKNOWLEDGMENTS

Action 132360

ACKNOWLEDGMENTS

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 132360
	Action Type: [C-144] Legacy Below Grade Tank Plan (C-144LB)

ACKNOWLEDGMENTS

<input checked="" type="checkbox"/>	I acknowledge that I have received prior approval from the OCD to submit documentation of a legacy below-grade tank on behalf of my operator.
<input checked="" type="checkbox"/>	I hereby certify that the information submitted with this documentation is true, accurate and complete to the best of my knowledge and belief.

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CONDITIONS

Action 132360

CONDITIONS

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 132360
	Action Type: [C-144] Legacy Below Grade Tank Plan (C-144LB)

CONDITIONS

Created By	Condition	Condition Date
swells	None	8/22/2022



New Mexico Site Characterization

REFERENCE

SITE INFORMATION

COMMENTS

C-141
C-141
C-141
C-141
NMOCD O&G Map

Site Name:	Navajo 26 #1 (API: 30-045-30099)
Coordinates:	36.693799, -108.284011
Incident Number:	NA
Land Owner:	Tribal
Site Elevation (ft):	5,870

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DTW INFORMATION

Cross reference USGS Map, NMOCD Map, and NMOSE Database

2nd Closest Water Well/Soil Boring		Closest Water Well/Soil Boring	
FALSE		CLOSER	
Name:	SJ-4359 POD A-8	Name:	SJ-4275 POD 1
Distance from Site (ft):	14,420 ft	Distance from Site (ft):	13,616
Direction from Site:	NE	Direction from Site:	N
Elevation (ft):	5,260	Elevation:	5,200
DTW (ft):	29	DTW (ft):	18
Total Depth (ft):	35	Total Depth (ft):	30
Date of most recent water level measurement:	9/25/2019	Date of most recent water level measurement:	2/6/2018
Coordinates:	36.721167, -108.247809	Coordinates:	36.729704, -108.291923
610 feet lower in elevation than the Site		670 feet lower in elevation than the Site	
639 Estimated DTW at the Site		688 Estimated DTW at the Site	
ESTIMATED DTW @ SITE:			
>100'			

COMMENTS

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CLOSEST SIGNIFICANT WATER SOURCE

NMOCD O&G Map

Type:	Stream/River
Distance (ft):	378 ft
Direction:	Southwest

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SITE RECEPTORS

C-141
NMOCD O&G Map
NMOCD O&G Map
OpenEnviroMap
NMOCD O&G Map
NMOCD O&G Map
OpenEnviroMap
National Wetlands Inventory
NMED Registered Mines Map
NMOCD O&G Map
NMOCD O&G Map
FEMA map
C-141

NO	Did this release impact groundwater or surface water?
NO	≤ 300 ft of a continuously flowing watercourse or any other significant watercourse?
NO	≤ 200 ft of any lakebed, sinkhole, or playa lake?
NO	≤ 300 ft of an occupied permanent residence, school, hospital, institution, or church?
NO	≤ 500 ft of a spring or a private water well used by < 5 houses for domestic or stock watering?
NO	≤ 1000 ft of any other fresh water well or spring?
NO	≤ Municipal boundaries or a defined municipal fresh water well field
NO	≤ 300 ft of a wetland?
NO	overlying a subsurface mine
NO	overlying unstable geology (HIGH KARST)?
Low	karst potential
NO	in a 100-year floodplain?
NO	Did the release impact areas not on an exploration, development, production or storage site?

Distance from Site (ft) / Comments

380 ft SW unnamed water course	
9 miles E - Morgan LAke	
12,000 ft N	
12,000 ft N	
> 5 miles	
> 5 miles	
380 ft SW unnamed water course	
None, > 5 miles	
None, > 5 miles	
None	
12,000 ft N	
No	

NMOCD TABLE 1 CLOSURE CRITERIA

FALSE

DRO+ GRO: 1,000 mg/kg TPH: 2,500 mg/kg Chlorides: 20,000 mg/kg

Navajo 26 #1

Pit Closure Pictures.



Navajo 26 #1
11/01/24



View Looking North



View Looking West



View Looking East

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

State of New Mexico
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CONDITIONS

Action 399523

CONDITIONS

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 399523
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By	Condition	Condition Date
jeffrey.harrison	BGT is on tribal land; therefore, the C-144 Form is accepted for only records retention purposes.	11/13/2024