cBZH2526540205 Compliance **Achievement and** Closure **Documentation and** cBZH2526540158 Correspondence **Documentation**

From: OCD.Engineer@emnrd.nm.gov

To: <u>Jamie Olivarez</u>

Cc: SJ Regulatory Notices; Matt Vicenik; Hall, Brittany, EMNRD

Subject: [EXTERNAL] Pre Enforcement Notification for iBZH2526228133

Date: Monday, September 22, 2025 11:14:02 AM

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State Of New Mexico Energy, Minerals and Natural Resources Department

22-Sep-25

HILCORP ENERGY COMPANY

Pre Enforcement Notification

1111 Travis Street Houston, TX 77002

Dear Operator:

The following inspection indicates that the well, equipment, location or operational status of the well failed to meet standards of the New Mexico Oil Conservation Division as described in the detail section below. To comply with standards imposed by Rules and Regulations of the Division, corrective action must be taken immediately and the situation brought into compliance. The detail section indicates preliminary findings and/or probable nature of the violation. This determination is based on an inspection of your well or facility by an inspector employed by the Oil Conservation Division on the date indicated.

Please notify the Compliance Officer copied on this letter, in writing, of the date corrective actions are scheduled to be made so that arrangements can be made to reinspect the well and/or facility.

INSPECTION DETAIL SECTION

[nAPP2526148806] San Juan 29-7 #563S OGRID: 372171 C-24-29N-07W

Inspection DateType InspectionInspectorInspection No.9/18/2025Initial Inspection[BZH] Brittany HalliBZH2526228133

Corrective

Violation	Title	Action Due
cBZH2526230962	19.15.10.8 Safety Procedures for Drilling and Production Fire Hazard	12/17/2025
	(Weeds around wellheads and equipment need to be rem	noved.)
cBZH2526540158	19.15.17 Pits, Closed-Loop Systems, Below Grade Tanks and Sumps Noncompliance with Permitting or Registration	10/17/2025
	(Registration documents indicate that the BGT was not convithin a 100-year floodplain. FEMA Map included in the relation by the BGT location marked north of where the BGT was convited of the floodplain. Inspection performed on 9/18/20 confirmed location of BGT is on the well pad and within the floodplain.)	egistration enstructed, 025,
cBZH2526540205	19.15.17 Pits, Closed-Loop Systems, Below Grade Tanks and Sumps Noncompliance with Requirements (Construction, Operations or Closure)	10/17/2025
	(Pursuant to 19.15.17.11 I. (3) NMAC effective 6/16/2008 operator shall construct a below-grade tank to prevent ov the collection of surface water run-on. Inspection was prolandowner complaint as the BGT overflowed due to a pre	erflow and mpted by

In the event that a satisfactory response is not received to this letter of direction by the "Corrective Action Due By:" date shown above, further enforcement will occur. Such enforcement may include this office applying to the Division for an order summoning you to a hearing before a Division Examiner in Santa Fe to show cause why you should not be ordered to permanently plug and abandon this well.

event.)

Note: Information in Detail Section comes directly from field inspector data entries - not all blanks will contain data.

Hall, Brittany, EMNRD

Priscilla Shorty

Tammy Jones: Kate Kaufman: Ben Mitchell: Velez, Nelson, EMNRC RE: [EXTERNAL] FW: SAN JUAN 29-7 UNIT 563S - INC - cBZH2526540205 Friday, October 17, 2025 8:18:00 AM

Good morning Priscilla,

Thank you for the photos. cBZH2526540205 has been closed.

Please include me and Nelson Velez (Nelson. Velez emnrd.nm.gov) on the notification that is sent to the Environmental Permitting Group of when the BGT(s) are being pulled and sampled. OCD is requiring witnessing of the pulling and sampling of the BGT(s) due to the open compliances.

You will be receiving an approval for an application shortly. The application I am creating will include a copy of this email chain and the photos of the berm, ditch, and culvert work. This is to document the closure of cBZH2526540205 and to document the approval of the extension and witnessing requirements for cBZH2526540158.

Thank you,

Brittany Hall

Environmental Field Compliance Supervisor

Environmental Field Compliance Group EMNRD - Oil Conservation Division 1000 Rio Brazos Road | Aztec, NM 87410 505.517.5333 | Brittany.Hall@emnrd.nm.gov

http://www.emnrd.nm.gov/ocd/

Effective 12/1/2024: OCD has updated guidance on karst potential occurrence zones. This notice can be found at: https://www.emnrd.nm.gov/ocd/ocd-announcementsand-notifications/ under "2024 OCD ANNOUNCEMENTS AND NOTIFICATIONS".

The Digital C-141 guidance documents can be found at https://www.emnrd.nm.gov/ocd/ocd-announcements-and-notifications/ or https://www.emnrd.nm.gov/ocd/ocd-announcements-announcements-and-notifications/ or <a href="https://www.emnrd.nm.gov/ocd/ocdforms/.

From: Priscilla Shorty <pshorty@hilcorp.com>

Sent: Friday, October 17, 2025 5:19 AM

To: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>

Cc: Tammy Jones <tajones@hilcorp.com>; Kate Kaufman <kkaufman@hilcorp.com>; Ben Mitchell <bemitchell@hilcorp.com>

Subject: RE: [EXTERNAL] FW: SAN JUAN 29-7 UNIT 563S - INC - cBZH2526540205

Good morning Brittany,

We appreciate the due date extension to 12/17/2025 for cBZH2526540158. Please see the attached photos for cBZH2526540205 and let us know if these are enough to close the compliance

Thank you,

Priscilla Shorty Operations Regulatory Technician Hilcorp Energy Company 505-324-5188 pshorty@hilcorp.com

From: Hall, Brittany, EMNRD < Brittany.Hall@emnrd.nm.gov>

Sent: Thursday, October 16, 2025 3:40 PM

To: Priscilla Shorty <pshorty@hilcorp.com>

Cc: Tammy Jones <tajones@hilcorp.com>; Kate Kaufman <kkaufman@hilcorp.com> Subject: RE: [EXTERNAL] FW: SAN JUAN 29-7 UNIT 563S - INC - cBZH2526540205

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Priscilla.

I did speak to Kate today about this. I will not be able to close cBZH2526540158 regarding the BGT being constructed in the floodplain until the BGT is removed. I extended the due date out to give Hilcorp time to complete the necessary steps to remove the BGT. Once the BGT closure is approved, I can close the compliance. The new due date for this compliance is 12/17/2025.

As for cBZH2526540158, I appreciate the map that was included in your email depicting the location of the berm, ditch, and culvert but were photos taken after the berm, ditch, and culvert were worked on? If so, please send me those photos and I will close out cBZH2526540205.

Thank you,

Brittany Hall

Environmental Field Compliance Supervisor

Environmental Field Compliance Group

EMNRD - Oil Conservation Division

1000 Rio Brazos Road | Aztec, NM 87410 505.517.5333 | Brittany.Hall@emnrd.nm.gov

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and-notifications/ under "2024 OCD ANNOUNCEMENTS AND NOTIFICATIONS".

The Digital C-141 guidance documents can be found at https://www.emnrd.nm.gov/ocd/ocd-announcements-and-notifications/ or <a href="https://www.emnrd.nm.gov/ocd/ocd-announcements-

From: Priscilla Shorty pshorty@hilcorp.com>

Sent: Thursday, October 16, 2025 2:13 PM

To: Hall, Brittany, EMNRD < Brittany. Hall@emnrd.nm.gov>

Cc: Tammy Jones <tajones@hilcorp.com>; Kate Kaufman <kkaufman@hilcorp.com>
Subject: [EXTERNAL] FW: SAN JUAN 29-7 UNIT 563S - INC - cBZH2526540205

Importance: High

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Brittany ~

I believe Kate has notified you that the BGT will be removed on the San Juan 29-7 Unit 563S. This should resolve cBZH2526540158 and cBZH2526540205. The due date for these is tomorrow, 10/17/2025. Is this enough information to close these? Thanks.

INC #	Well	Action	Due Date	Hilcorp Comment
cBZH2526230962		Weeds around wellheads and equipment need to be removed	12/17/2025	Pending input from Jamie and/or Ben.
cBZH2526540158		Registration documents indicate that the BGT was not constructed within a 100-year floodplain. FEMA Map included in the registration has BGT location marked north of where the BGT was constructed, outside of the floodplain. Inspection performed on 9/18/2025, confirmed location of BGT is on the well pad and within the 100-year floodplain	10/17/2025	Hilcorp will remove the BGT in accordance with the procedures outlined in NMAC 19.15.17.13.
cBZH2526540205	29-7 563S	Pursuant to 19.15.17.11 I. (3) NMAC effective 6/16/2008, The operator shall construct a belowgrade tank to prevent overflow and the collection of surface water run-on. Inspection was prompted by landowner complaint as the BGT overflowed due to a precipitation event.)	10/17/2025	Hilcorp will remove the BGT in accordance with the procedures outlined in NMAC 19.15.17.13. In addition, Hilcorp installed flood mitigation features to minimize impacts due to precipitation and flooding events. A ditch was established upstream of the existing berm and the existing culvert was cleaned out. The ditch is approximately 2' deep. The berm was reestablished with 8 loads of material and is approximately 3' tall. Figure attached for reference.

Priscilla Shorty
Operations Regulatory Technician
Hilcorp Energy Company
505-324-5188
pshorty@hilcorp.com

From: Priscilla Shorty pshorty@hilcorp.com>

Sent: Monday, September 22, 2025 11:36 AM

To: Riley Roberts - (C) <Riley.Roberts@hilcorp.com>; Mitch Killough mkillough@hilcorp.com; Clara Cardoza@hilcorp.com>; Brandon Sinclair mkillough.com; Mark McKnight mkillourp.com; Rate Kaufman kkaufman@hilcorp.com; Bryan Hall hhall@hilcorp.com; Jamie Huffman hlicorp.com; Mark McKnight mmcknight@hilcorp.com; Priscilla Shorty nhall@hilcorp.com; Trey Sullivan hlicorp.com; Trey

Subject: SAN JUAN 29-7 UNIT 563S - INC - cBZH2526540205

Importance: High

Today's Date:	9/22/2025			

Well Name:	SAN JUAN 29-7 UNIT 563S	Location:	Sec: 24	Twn: 029N	Rng: 007W	UL: C	
API Number:	30.039.27428	Footage:		790' FNL & 1640' FWL			
Operator:	Hilcorp Energy Company	Area/Run/MSO:	10	1002 Riley Roberts			
Meter #:	297330	02	Pipeline:	HEC			
INC Number:	cBZH2526540205	Agency:	OCD	Inspector:	Brittany Hall		
Type of INC:	Verbal	Photos Required:	Yes	Due Date:	10/17/2025		
Issue of Concern:	Pursuant to 19.15.17.11 I. (3) NMAC effective 6/16/2008, The operator shall construct a below-grade tank to prevent overflow and the collection of surface water run-on. Inspection was prompted by landowner complaint as the BGT overflowed due to a precipitation event.						

Priscilla Shorty
Operations Regulatory Technician
Hilcorp Energy Company
505-324-5188
pshorty@hilcorp.com

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

CONDITIONS

Action 516459

CONDITIONS

Operator:	OGRID:
HILCORP ENERGY COMPANY	372171
1111 Travis Street	Action Number:
Houston, TX 77002	516459
	Action Type:
	[IM-SD] Well File Support Doc (ENV) (IM-BWF)

CONDITIONS

Create By	d Condition	Condition Date
bhal	None	10/17/2025