

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	NCS1929541151
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party Hilcorp Energy Company	OGRID 372171
Contact Name Jennifer Deal	Contact Telephone 832-839-4585
Contact email jdeal@hilcorp.com	Incident # (assigned by OCD) NCS1929541151
Contact mailing address 382 Road 3100, Aztec NM 87410	

Location of Release Source

Latitude 36.758495 _____ Longitude -108.2162476 _____
(NAD 83 in decimal degrees to 5 decimal places)

Site Name FRPC 4 1	Site Type Gas Well
Date Release Discovered 9/25/2019 @ 3:15pm	API# (if applicable) 30-045-31995

Unit Letter	Section	Township	Range	County
D	04	29N	13W	San Juan

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

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) 23 bbls	Volume Recovered (bbls) 13
	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)

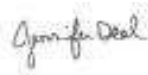
Cause of Release

A release of ~23 bbls of produced water was released due to the water pump line leaking from corrosion. The operator shut in the well and a one call was submitted to begin excavation to repair the line. Release remained on location. 13 bbls were recovered. Environmental will provide OCD 48 hour notice of sampling.

Was this a major release as defined by 19.15.29.7(A) NMAC? <input checked="" type="checkbox"/> Yes <input 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: _____ Jennifer Deal _____ Title: _____ Environmental Specialist _____
Signature: _____  _____ Date: ____5/1/2020__
email: _____ jdeal@hilcorp.com _____ Telephone: _____ 5058016517 _____
<u>OCD Only</u> Received by: _____ Date: _____

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	<u><50</u> (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: *Each of the following items must be included in the report.*

- ☒ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☒ Field data
- ☒ Data table of soil contaminant concentration data
- ☒ Depth to water determination
- ☒ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☒ Boring or excavation logs
- ☒ Photographs including date and GIS information
- ☒ Topographic/Aerial maps
- ☒ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

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: _____ Mitch Killough _____ Title: _____ Environmental Specialist _____

Signature: _____  Date: __8/17/2021__

email: _____ mkillough@hilcorp.com _____ Telephone: _____ 281-851-2338 _____

OCD Only

Received by: _____ Date: _____

Remediation Plan

Remediation Plan Checklist: *Each of the following items must be included in the plan.*


- ☒ Detailed description of proposed remediation technique
- ☒ Scaled sitemap with GPS coordinates showing delineation points
- ☒ Estimated volume of material to be remediated
- ☒ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☒ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- ☒ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☒ Extents of contamination must be fully delineated.
- ☒ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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: Mitch Killough Title: Environmental Specialist

Signature:  Date: 8/17/2021

email: mkillough@hilcorp.com Telephone: 281-851-2338

OCD Only

Received by: Chad Hensley Date: 10/08/2021

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☒ Deferral Approved

Signature:  Date: 10/08/2021



September 10, 2021

New Mexico Energy, Minerals and Natural Resources Department
New Mexico Oil Conservation Division
1000 Rio Brazos Road
Aztec, New Mexico 87410

**Subject: Remediation and Deferral Report – Subsequent Liner Installation Letter
FRPC 4-1
Hilcorp Energy Company
San Juan County, New Mexico
NMOCD Incident Number: NCS1929541151**

To Whom It May Concern:

On August 17, 2021, WSP USA Inc. (WSP) submitted, on behalf of Hilcorp Energy Company (Hilcorp), a *Remediation and Deferral Report* for the FRPC 4-1 production well site (Site). At the time, the liner installation was not complete, and the report stated that a subsequent letter would be submitted documenting the liner installation. The liner has been installed and this report provides details on that work.

LINER INSTALLATION

On August 24, 2021 Hilcorp installed a 20-mil linear low-density polyethylene (LLDPE) liner laterally at the base of the excavation and vertically down the trench sidewalls (approximately 8 feet below ground surface) surrounding the excavation. The liner dimensions are approximately 72 feet by 120 feet, and it covers the entire base of the excavation as well as the trench sidewalls (shown on Figure 1). After installation of the 20-mil liner the entire excavation was backfilled with non-waste containing soil. Approximately 1,500 cubic yards of soil were used to backfill the excavation. Backfilling operations were completed on August 26, 2021. Pictures documenting the liner installation and backfilling can be found in the Enclosure A.

Full site characterization, closure criteria, site activities, remediation activities, conclusions and the formal deferral request can be found in the *Remediation and Deferral Report* submitted by WSP on August 17, 2021 via the NMOCD online e-permitting portal.

WSP appreciates the opportunity to provide this subsequent remediation letter to the NMOCD. If you have any questions or comments regarding this remediation work plan, do not hesitate to contact Ashley Ager at (970) 385-1096 or via email at ashley.ager@wsp.com or Mitch Killough at (713) 757-5247 or at mkillough@hilcorp.com.

Kind regards,

A handwritten signature in black ink, appearing to read 'Josh Adams'.

Josh Adams, P.G.
Geologist

A handwritten signature in black ink, appearing to read 'Ashley L. Ager'.

Ashley Ager, M.S., P.G.
Assistant Vice President, Geologist

Enclosed:

Figure 1: Trench and Liner Location
Enclosure A: Photographic Log

WSP USA
848 EAST 2ND AVENUE
DURANGO CO 81301

Tel.: 970-385-1096
wsp.com

FIGURE



IMAGE COURTESY OF ESRI

LEGEND

- SOIL BORING
- LINER LOCATION
- TRENCH EXCAVATION. LINER IS INSTALLED VERTICALLY WITHIN THESE TRENCHES.

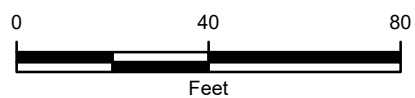


FIGURE 1
TRENCH AND LINER LOCATION
FRPC 4-1
UNIT D SEC 4-T29N-R13W
SAN JUAN COUNTY, NEW MEXICO
HILCORP ENERGY COMPANY




P:\Hilcorp\GIS\TE017820013_FRPC 4-1\MXD\017820013_FIG06_TRENCH_LINER_LOC.mxd

ENCLOSURE A – PHOTOGRAPHIC LOG



PHOTOGRAPHIC LOG		
HILCORP ENERGY COMPANY	FRPC 4-1 SAN JUAN COUNTY, NEW MEXICO	TE017819013

Photo No.	Date	
1	8/24/2021	
View of the western edge of the 20-mil liner.		 A photograph showing a large area of dry, cracked earth in the foreground. A large, wrinkled, light blue tarp is partially covering the ground. In the background, there is a chain-link fence topped with a brown privacy screen. Beyond the fence, there are rolling hills under a clear blue sky.

Photo No.	Date	
2	8/24/2021	
View of the northwestern edge of the 20-mil liner.		 A photograph showing a large area of dry, cracked earth in the foreground. A large, wrinkled, light blue tarp covers most of the ground. In the background, there is a chain-link fence topped with a brown privacy screen. Beyond the fence, there are rolling hills under a clear blue sky.



PHOTOGRAPHIC LOG

HILCORP ENERGY COMPANY	FRPC 4-1 SAN JUAN COUNTY, NEW MEXICO	TE017819013
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Photo No.	Date	
3	8/24/2021	
View of the 20-mil liner within the northern trench surrounding the excavation.		 A photograph showing a long, narrow trench dug into the ground. The bottom of the trench is covered with a white, wrinkled plastic liner. The trench is bordered by a chain-link fence on the right side. The background shows a clear blue sky and some distant hills.

Photo No.	Date	
4	8/24/2021	
View of the central portion of the liner around the wellhead.		 A photograph showing a central portion of the white plastic liner. A yellow excavator is visible in the background, working on the trench. The liner is spread out on the ground, and the surrounding area is sandy and uneven. The background shows a clear blue sky and some distant hills.



PHOTOGRAPHIC LOG

HILCORP ENERGY COMPANY	FRPC 4-1 SAN JUAN COUNTY, NEW MEXICO	TE017819013
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Photo No.	Date	
5	8/24/2021	
View of eastern edge of the 20-mil liner.		 A photograph showing the eastern edge of a large, white, 20-mil liner. The liner is partially covered by a yellow excavator and a white trailer. The background shows a clear blue sky and a hilly landscape.

Photo No.	Date	
6	8/24/2021	
View of the south edge of the 20-mil liner.		 A photograph showing the south edge of a large, white, 20-mil liner. The liner is partially covered by a yellow excavator and a white trailer. The background shows a clear blue sky and a hilly landscape.



PHOTOGRAPHIC LOG		
HILCORP ENERGY COMPANY	FRPC 4-1 SAN JUAN COUNTY, NEW MEXICO	TE017819013



Photo No.	Date	
7	8/26/2021	
View of excavation after backfilling was completed.		

Photo No.	Date	
8	8/26/2021	
View of excavation after backfilling was completed.		

District I

1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720

District II

811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720

District III

1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170

District IV

1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 47732

CONDITIONS

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 47732
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
chensley	Hilcorps's deferral requests to complete final remediation during any future major construction/alteration or final plugging and abandonment, whichever occurs first is approved. The deferred C-141 will be accepted for record and marked accordingly. The release will remain open in OCD database files and reflect an open environmental issue.	10/8/2021