



Billy Ginn  
Hilcorp Energy Company  
1111 Travis Street  
Houston, TX 77002  
(346) 237-2073  
[william.ginn@hilcorp.com](mailto:william.ginn@hilcorp.com)

February 12, 2025

New Mexico Oil Conservation Division  
New Mexico Energy, Minerals, and Natural Resources Department  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

**Re: Liner Inspection Summary and Closure Request**

**William Turner 29, fAPP2224171499**

**Lea County, New Mexico**

**Hilcorp Energy Company**

**NMOCD Incident No. nAPP2502163386**

To Whom it May Concern:

On January 21<sup>st</sup>, 2025, at approximately 7:30 am (MT), a Hilcorp operator discovered a 120-bbl produced water release at the William Turner 29 Central Tank Battery in Lea County, NM (32.2644, -103.1052). Note: Surface ownership (private). Upon discovery, the well was shut-in and a water truck (operated by Empire Energy) was dispatched to remove all free liquids from within the lined, secondary containment surrounding the storage tanks. After further investigation, it was determined that the release was the result of corrosion on the 500-barrel produced water tank manway. No released fluids migrated horizontally out of secondary containment or off the pad. The recovered fluid volume from within secondary containment amounted to 120 bbls, per the Water Hauling Ticket/Manifest provided by Empire Energy on the day of the release.

As required by the New Mexico Oil Conservation Division (NMOCD), Hilcorp provided a Notice of Release and Initial Form C-141 on January 21<sup>st</sup>, 2025, and February 4<sup>th</sup>, 2025, respectively, both of which were approved by the NMOCD. NMOCD assigned the release Incident Number nAPP2502163386.

On February 11<sup>th</sup>, 2025, at 9:00 am (MT), the liner inspection was conducted in accordance with NMAC 19.15.29.11.A.5(a)(ii). This involved exposing the liner by removing the gravel on top of the liner in order for a thorough integrity check to be made. Hilcorp determined that the liner was in satisfactory condition. It should be noted that the NMOCD was provided a 48-hour notice prior to commencing the liner inspection. No NMOCD representation was present at the time of the scheduled liner inspection.

Based on the findings from the liner inspection discussed above, Hilcorp has determined that the integrity of the liner is satisfactory and had the ability to contain the spill in question. As such, Hilcorp respectfully requests closure for Incident Number nAPP2502163386.

Should any concerns or questions arise, please contact me at (346) 237-2073.

Sincerely,

A handwritten signature in black ink, appearing to read "Billy Ginn", with a long horizontal flourish extending to the right.


Billy Ginn

Environmental Specialist – L48W

Attachments:     Water Hauler Trucking Ticket (dated 1/21/2024)  
                         NMOCD Correspondence  
                         Liner Survey Photos

WATER HAULER TRUCKING TICKET (DATED 1/21/2025)

AP 0123

  
Empire Energy  
P.O BOX 813  
EUNICE, NM 88231  
575-605-0647

No. 0154

DATE: 01/21/25

COMPANY: Apache

LEASE: Turner 29 Battery

DRIVER: Adrian Garcia

FRESH WATER: \_\_\_\_\_ BBLs

PRODUCED WATER: 120 \_\_\_\_\_ BBLs

OTHER: \_\_\_\_\_ BBLs

HAUL FROM: Turner 29 Battery

HAUL TO: Parker Disposal

COMMENTS: \_\_\_\_\_

SIGNATURE: [Signature]



NMOCD CORRESPONDENCE (10/08/2024 – 10/10/2024)

## Billy Ginn

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**From:** William.Ginn@hilcorp.com  
**Subject:** FW: [EXTERNAL] FW: The Oil Conservation Division (OCD) has accepted the application, Application ID: 423167

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**From:** [OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us) <[OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us)>  
**Sent:** Tuesday, January 21, 2025 5:37 PM  
**To:** Stuart Hyde <[shyde@ensolum.com](mailto:shyde@ensolum.com)>  
**Subject:** The Oil Conservation Division (OCD) has accepted the application, Application ID: 423167

[ \*\*EXTERNAL EMAIL\*\* ]

To whom it may concern (c/o Stuart Hyde for HILCORP ENERGY COMPANY),

The OCD has accepted the submitted *Notification of a release* (NOR), for incident ID (n#) nAPP2502163386, with the following conditions:

- **When submitting future reports regarding this release, please submit the calculations used or specific justification for the volumes reported on the initial C-141.**

Please reference nAPP2502163386, on all subsequent C-141 submissions and communications regarding the remediation of this release.

**NOTE:** As of December 2019, NMOCD has discontinued the use of the “RP” number.

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

[ocd.enviro@state.nm.us](mailto:ocd.enviro@state.nm.us)

**New Mexico Energy, Minerals and Natural Resources Department**  
1220 South St. Francis Drive  
Santa Fe, NM 87505

## Billy Ginn

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**From:** OCDOnline@state.nm.us  
**Sent:** Tuesday, February 4, 2025 11:40 AM  
**To:** Billy Ginn  
**Subject:** [EXTERNAL] The Oil Conservation Division (OCD) has approved the application, Application ID: 427735

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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

To whom it may concern (c/o William Ginn for HILCORP ENERGY COMPANY),

The OCD has approved the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAPP2502163386, with the following conditions:

- **None**

The signed C-141 can be found in the OCD Online: Imaging under the incident ID (n#).

If you have any questions regarding this application, please contact me.

Thank you,  
Nelson Velez  
Environmental Specialist - Advanced  
505-469-6146  
Nelson.Velez@emnrd.nm.gov

**New Mexico Energy, Minerals and Natural Resources Department**  
1220 South St. Francis Drive  
Santa Fe, NM 87505

**Billy Ginn**

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**From:** OCDOnline@state.nm.us  
**Sent:** Thursday, February 6, 2025 3:52 PM  
**To:** Billy Ginn  
**Subject:** [EXTERNAL] The Oil Conservation Division (OCD) has accepted the application, Application ID: 429278

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

To whom it may concern (c/o William Ginn for HILCORP ENERGY COMPANY),

The OCD has received the submitted *Notification for Liner Inspection for a Release* (C-141L), for incident ID (n#) nAPP2502163386.

The liner inspection is expected to take place:

**When:** 02/11/2025 @ 09:00

**Where:** O-29-21S-37E 0 FNL 0 FEL (32.44555,-103.18111)

**Additional Information:** N/A

**Additional Instructions:** 32.44561, -103.18150

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, liner inspection pursuant to 19.15.29.11.A(5)(a) NMAC is required. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

- **Failure to notify the OCD of liner inspections including any changes in date/time per the requirements of 19.15.29.11.A(5)(a)(ii) NMAC, may result in the inspection not being accepted.**

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

**New Mexico Energy, Minerals and Natural Resources Department**

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## LINER SURVEY PHOTOS

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# Site Photographs (2/11/2025)



Photograph 1 (dated 2/11/2025) – View of lease sign.



Photograph 2 (dated 2/11/2025) – View looking N at west side secondary containment with the liner exposed.



# Site Photographs (2/11/2025)



Photograph 3 (dated 2/11/2025) – View looking N at east side secondary containment with the liner exposed



Photograph 4 (dated 2/11/2025) – View looking SE at the exposed liner within secondary containment.



**COMMENTS**


**COMMENTS**


Type:	Stream
Distance (ft):	10,146
Direction:	Southwest

**Distance from Site (ft) / Comments**

10146 feet SW	
1.87 miles N	
Occupied Bldg 1022 Feet East	
.25 miles East	
1677 ft North	
0.6 miles East	
2 miles SW	
1.65 miles N	
>5 miles West	
>5 miles N	

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**

QUESTIONS

Action 433841

**QUESTIONS**

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 433841
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Prerequisites</b>	
Incident ID (n#)	nAPP2502163386
Incident Name	NAPP2502163386 WILLIAM TURNER 29 CTB @ 0
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2224171499] Turner 29

<b>Location of Release Source</b>	
<i>Please answer all the questions in this group.</i>	
Site Name	WILLIAM TURNER 29 CTB
Date Release Discovered	01/21/2025
Surface Owner	Private

<b>Incident Details</b>	
<i>Please answer all the questions in this group.</i>	
Incident Type	Produced Water Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

<b>Nature and Volume of Release</b>	
<i>Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.</i>	
Crude Oil Released (bbls) Details	Cause: Corrosion   Tank (Any)   Crude Oil   Released: 1 BBL   Recovered: 1 BBL   Lost: 0 BBL.
Produced Water Released (bbls) Details	Cause: Corrosion   Tank (Any)   Produced Water   Released: 130 BBL   Recovered: 130 BBL   Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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QUESTIONS, Page 2

Action 433841

**QUESTIONS (continued)**

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 433841
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Nature and Volume of Release (continued)</b>	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

**Initial Response**

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

The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	N/A

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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.

I hereby agree and sign off to the above statement	Name: Stuart Hyde Title: Senior Geologist Email: shyde@ensolum.com Date: 02/20/2025
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QUESTIONS, Page 3

Action 433841

**QUESTIONS (continued)**

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 433841
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Site Characterization</b>	
<i>Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 75 and 100 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Between 1 and 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1000 (ft.) and ½ (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1000 (ft.) and ½ (mi.)
Any other fresh water well or spring	Between 1000 (ft.) and ½ (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Between ½ and 1 (mi.)
A wetland	Between 1 and 5 (mi.)
A subsurface mine	Between 1 and 5 (mi.)
An (non-karst) unstable area	Between 1 and 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

<b>Remediation Plan</b>	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	01/21/2025
On what date will (or did) the final sampling or liner inspection occur	02/11/2025
On what date will (or was) the remediation complete(d)	02/11/2025
What is the estimated surface area (in square feet) that will be remediated	5600
What is the estimated volume (in cubic yards) that will be remediated	0
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 4

Action 433841

**QUESTIONS (continued)**

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 433841
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Remediation Plan (continued)</b>	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
<b>This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:</b>	
<i>(Select all answers below that apply.)</i>	
Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	Not answered.
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
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.	
I hereby agree and sign off to the above statement	Name: Stuart Hyde Title: Senior Geologist Email: shyde@ensolum.com Date: 02/20/2025
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	



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**Santa Fe, NM 87505**

QUESTIONS, Page 6

Action 433841

**QUESTIONS (continued)**

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID:
	372171
	Action Number:
	433841
Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

**QUESTIONS**

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	429278
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	02/11/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	5600

**Remediation Closure Request**

*Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.*

Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	0
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	Secondary containment liner inspection completed and no integrity issues were found.

*The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (in .pdf format) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.*

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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

I hereby agree and sign off to the above statement	Name: Stuart Hyde Title: Senior Geologist Email: shyde@ensolum.com Date: 02/20/2025
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CONDITIONS

Action 433841

CONDITIONS

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 433841
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
nvez	Liner inspection approved, release resolved.	4/14/2025