

September 9, 2025

Ramon Hancock Sr. Landman - San Juan North Hilcorp San Juan, L.P.

RE: Salty Dog SWD #1 Remediation Approval - Hilcorp Energy Company

Dear Mr. Hancock,

We received your email regarding the Hilcorp Energy Siting Summary Report prepared by Ensolum, LLC. We have consulted with our legal and technical consultants and have the following comments.

- The site background information does not include the date when the 5 point composite was collected for analysis or the laboratory analytical results.
- No volatile organic compound (VOC) headspace readings were recorded on the soil boring logs; therefore, vapor concentrations in the borings are unknown.
- Soil boring logs indicate that clay was present in the borings; leaving a boring open for only 72 hours and may not be enough time for groundwater to enter a boring/well that is advanced into clay (because of the smear zone).
- The soil location map (Figure 1) indicates that at least six registered wells are present cross gradient from the Salty Dog location, with reported depths to water ranging from 11 to 42 feet bgs.
- The pond at Riverview Golf Course is located approximately 2400 feet SSW of the Salty Dog location, with a shallow drainage channel along this flow path. Review of historic aerials indicates the possibility of shallow hydraulic connectivity.
- Both the San Juan College West Campus and the Kirtland Youth Center are present downgradient at approximately 3,000 ft and 4,000 ft, respectively.

Given the presence of shallow groundwater (11 to 42 ft bgs) cross gradient from the Salty Dog SWD, in addition to the location of the Salty Dog SWD in proximity to downgradient potential points of exposure at the Riverview Golf Course, and to a lesser degree at the college campus and youth center, the Town of Kirtland requests that the most stringent cleanup standards are implemented for this location (i.e. where groundwater is LESS than 50 ft bgs).

Sincerely,

Andrew Gilbert Mayor Pro Tempore Town of Kirtland

AIM

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

CONDITIONS

Action 505239

## **CONDITIONS**

Operator:	OGRID:
HILCORP ENERGY COMPANY	372171
1111 Travis Street	Action Number:
Houston, TX 77002	505239
	Action Type:
	[IM-SD] Incident File Support Doc (ENV) (IM-BNF)

## CONDITIONS

Cre By	eated	Condition	Condition Date
CS	smith	None	9/11/2025